



WILLOWTREE PLANNING

ENVIRONMENTAL IMPACT STATEMENT:

15-21 BRITTON STREET MULTI-LEVEL WAREHOUSE

SSD-67368956

15 – 21 Britton Street and 28 – 54 Percival Road, Smithfield
Lot 1 DP 597082 and Lot 34 DP 617521

Prepared by Willowtree Planning Pty Ltd
on behalf of **Lendlease Real Estate Investments** as responsible entity for **Australian Prime Property Fund Industrial**

31 October 2024

Willowtree Planning acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing and ongoing connections to land, waters, and community.

We acknowledge the Cammeraygal people, the Traditional Custodians of the land where this document was prepared, as well as the Traditional Owners of the Land where the proposed development will be located, the Gadigal people of the Eora Nation. We pay our respects to Elders past, present and emerging.

DOCUMENT CONTROL TABLE			
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EIS DECLARATION

**Declaration Form: Submission of EIS
Project Details**

Project name	15 – 21 Britton Street Multi-Level Warehouse
Application number	SSD-67368956
Address of the land on which the development is to be carried out	15 – 21 Britton Street and 28 – 54 Percival Road, Smithfield

Proponent Details

Proponent name	Lendlease Real Estate Investments as responsible entity for Australian Prime Property Fund Industrial ("Lendlease")
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Declaration by registered environmental assessment practitioner

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Declaration	The undersigned declares that this EIS: - has been prepared in accordance with Part 8 of the <i>Environmental Planning and Assessment Regulation 2021</i>; - contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates; - does not contain information that is false or misleading; - addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project; - identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments; - has been prepared having regard to the Department's <i>State Significant Development Guidelines - Preparing an Environmental Impact Statement</i>; - contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development; - contains a consolidated description of the project in a single chapter of the EIS; - contains an accurate summary of the findings of any community engagement; and - contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.
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Signature	
Date	31/10/2024



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GLOSSARY OF KEY TERMS

Term	Meaning
ACHA	Aboriginal Cultural Heritage Assessment
ADWF	Average Dry Weather Flow
AEP	Annual Exceedance Probability
ARI	Average Recurrence Interval
BAM	Biodiversity Assessment Methodology
BCA	Building Code of Australia
BC Act	<i>Biodiversity Conservation Act 2016</i>
BDAR	Biodiversity Development Assessment Report
CLEP 2021	<i>Cumberland Local Environmental Plan 2021</i>
BOS	Biodiversity Offset Scheme
CBD	Central Business District
CEMP	Construction Environmental Management Plan
CNVMP	Construction Noise and Vibration Management Plan
Council	Cumberland City Council
CTMP	Construction Traffic Management Plan
CDCP 2021	<i>Cumberland Development Control Plan 2021</i>
DP	Deposited Plan
DPHI	Department of Planning, Housing and Infrastructure
EDC	Estimated Development Cost
EIS	Environmental Impact Statement
EOT	End of Trip
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2021</i>
EPA	Environment Protection Authority
EPBC Act	<i>Commonwealth Environment Protection and Biodiversity Conservation Act 1999</i>
EPI	Environmental Planning Instrument
EPL	Environmental Protection Licence
ESD	Ecologically Sustainable Development
FSR	Floor Space Ratio
GFA	Gross Floor Area
LGA	Local Government Area
MNES	Matter of National Environmental Significance
MUSIC	Model for Urban Stormwater Improvement Conceptualisation
NCC	National Construction Code
NMLs	Noise Management Levels



ENVIRONMENTAL IMPACT STATEMENT

15 – 21 Britton Street, Smithfield
Lot 1 DP 597082 and Lot 34 DP 617521)

SSD-67368956

OSD	On-Site Detention
RL	Reduced level
SEARs	Secretary's Environmental Assessment Requirements (SSD-67368956), dated 13 February 2024
SEPP	State Environmental Planning Policy
SIDRA	Signalised & unsignalised Intersection Design and Research Aid
SSD	State Significant Development
SSDA	State Significant Development Application
Subject site	15 – 21 Britton Street and 28 – 54 Percival Road, Smithfield
TfNSW	Transport for NSW
Willowtree Planning	Willowtree Planning Pty Ltd
WM Act	<i>Water Management Act 2000</i>
WSUD	Water Sensitive Urban Design



SUMMARY

Overview and Project Description

This State Significant Development Application (SSDA) relates to the redevelopment of the site at 15 – 21 Britton Street and 28 – 54 Percival Road, Smithfield (known as the “subject site”). This Environmental Impact Statement (EIS) has been prepared by Willowtree Planning Pty Ltd (Willowtree Planning), on behalf of Lendlease Real Estate Investments as responsible entity for Australian Prime Property Fund Industrial (Lendlease). In short, the proposal involves the construction and operation of a warehouse and distribution centre, comprising:

- Site preparation and establishment works, including:
 - Demolition of existing buildings and structures;
 - Clearing of nominated vegetation within the proposed development area;
 - Bulk earthworks to create proposed site levels;
 - Decommissioning of existing vehicle crossings; and
 - In-ground building services and utility work.
- Construction and operation of three (3) multi-level warehouse buildings across the two (2) allotments, comprising the following:
 - Two (2) two-storey warehouse buildings located on Lot 34 DP 617521 (Warehouse A and B), comprising of 12 individual warehouse units and ancillary office;
 - A three-storey building located on Lot 1 DP 597082 (Warehouse C), comprising of 9 individual warehouse units, ancillary office, and a café;
 - Shared outdoor amenity areas provided for employees on level 1;
 - Connected hardstand on ground floor and level 1 that will allow for vehicle circulation across the whole site;
 - A total of 482 carparking spaces within three separate carparking areas;
 - A total Gross Floor Area (GFA) of 96,568m², including 88,976m² of warehouse, 7,036m² of office, 71m² of café, 220m² of end of trip facilities and 265m² of shared amenities;
 - Four (4) new vehicle crossings on Percival Road and four (4) new vehicle crossings on Britton Street to provide separate entry and exit for heavy and light vehicles; and
 - Extensive ground and on-building landscaping works.

Perspectives of the proposed development are provided in **Figure 1** and **Figure 2**.





Figure 1. Proposed Development Britton Street (Source: SBA Architects, 2024)



Figure 2. Proposed Development Percival Road (Source: SBA Architects, 2024)

The proposal is State Significant Development (SSD) pursuant to Schedule 1, Clause 12 of *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP), as it has an Estimated Development Cost (EDC) of more than \$50 million. The Secretary of the Department issued industry-specific Secretary's Environmental Assessment Requirements (SEARs) (reference: SSD-67368956) for warehouses and distribution centres on 13 February 2024, in accordance with Section 4.39 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The Site

The subject site is legally described as Lot 1 DP 597082 and Lot 34 DP 617521, with frontage to both Britton Street and Percival Road. The subject site has a total area of 87,715m² and is made up of two (2) allotments.



The subject site is located within the Smithfield Industrial Estate and is bound by established warehouse buildings and industrial land uses. Each allotment contains existing industrial uses, including warehouse buildings, carparking, landscaping and ancillary buildings and structures. The subject site is depicted in **Figure 3**, and the surrounding context is depicted in **Figure 4** below.

The subject site is located within the Cumberland Local Government Area (LGA). It is located within the E4 General Industrial Zone (E4 Zone) and is subject to the provisions of the *Cumberland Local Environmental Plan 2021* (CLEP 2021). The E4 Zone is intended to:

- *Provide a range of industrial, warehouse, logistics and related land uses.*
- *Ensure the efficient and viable use of land for industrial uses.*
- *Minimise any adverse effect of industry on other land uses.*
- *Encourage employment opportunities.*
- *Enable limited non-industrial land uses that provide facilities and services to meet the needs of businesses and workers.*

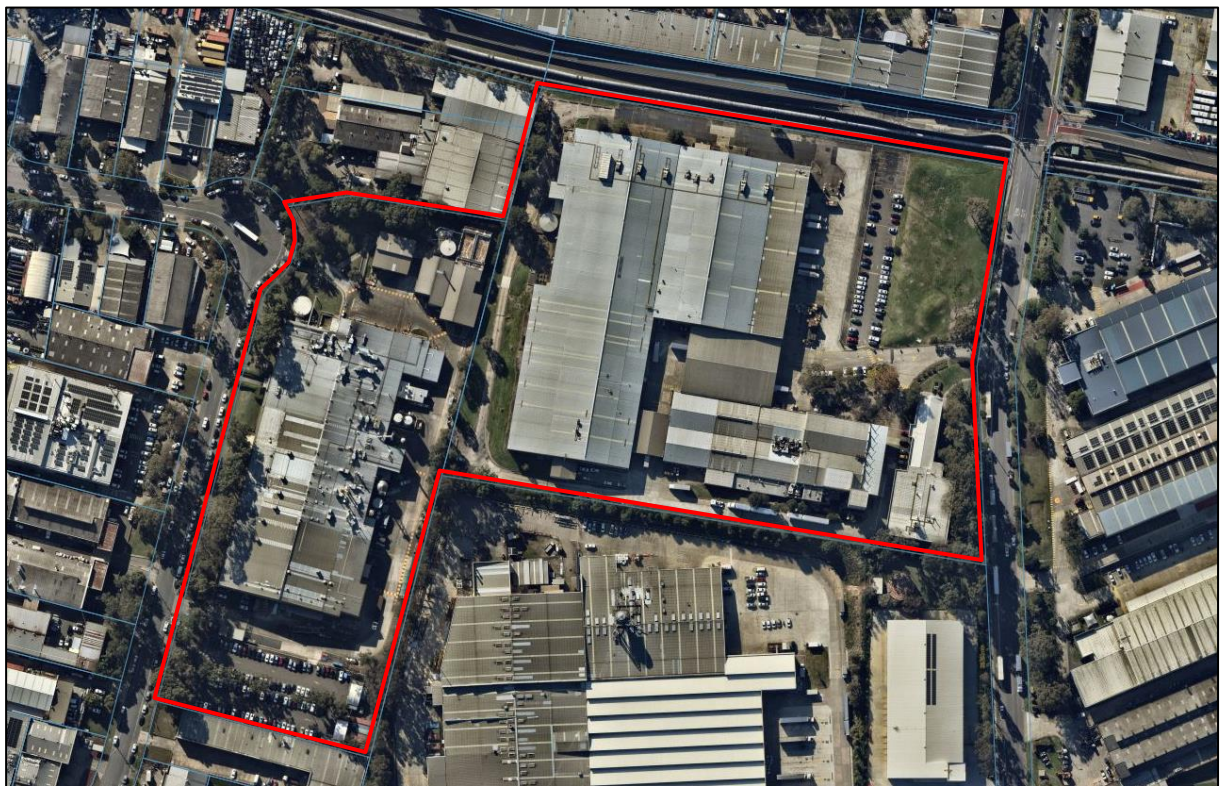


Figure 3. Subject Site (Source: NearMap, 2024)

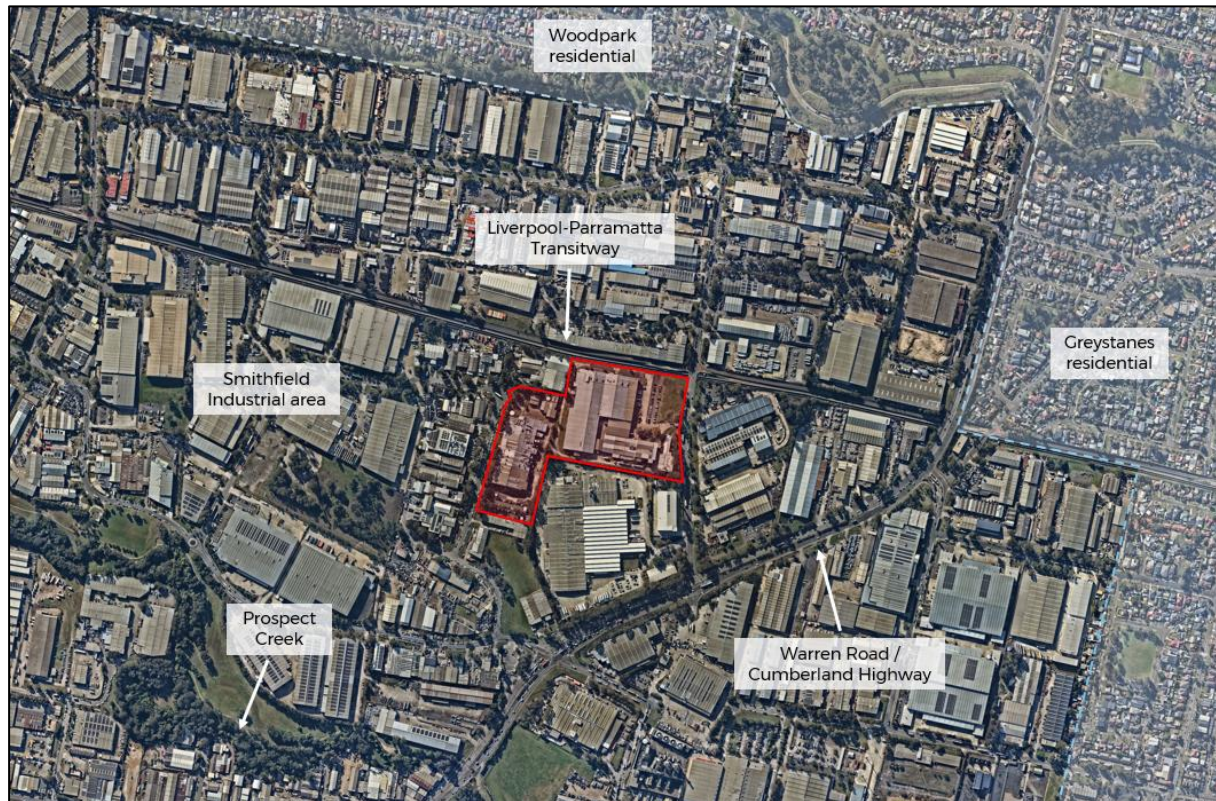


Figure 4. Site Context and Surrounding Area (Source: Willowtree Planning, 2024)

Planning and Legislative Framework

All relevant Federal and State legislation, as well as Environmental Planning Instruments (EPIs), have been considered in the preparation of this EIS. The proposal is satisfactory in terms of its legislative context, on the basis that:

- The proposal is permissible in the E4 zone;
- The objectives of the zone are satisfied;
- The range of applicable State Environmental Planning Policies (SEPPs) have been considered;
- Strategic documents that apply to the locality and wider region have identified that the proposed use is consistent with the strategic context of the area; and
- The proposed development can satisfy the relevant provisions of the National Construction Code (NCC) and applicable Australian Standards.

Engagement

A range of authorities have been consulted with during the preparation of this EIS. These include:

- Cumberland City Council;
- Department of Planning, Housing and Infrastructure (DPHI);
- Transport for NSW (TfNSW);
- NSW Environment Protection Authority;
- Sydney Water;
- Water NSW;
- Natural Resources Access Regulator;
- Telstra / NBNCo;
- Endeavour Energy;
- Deerubbin Local Aboriginal Land Council;



- Registered Aboriginal Parties (as outlined in the Aboriginal Cultural Heritage Assessment (ACHA);
- Heritage NSW; and
- Surrounding local landowners, business and stakeholders.

Relevant feedback has been incorporated into the project's design, where practicable.

Environmental Impact Assessment

An assessment of environmental impacts has been undertaken against the relevant planning controls and policies. Additionally, a number of expert consultants have been engaged to specifically consider relevant aspects of the proposal. The environmental impact assessment has found that the proposed development complies with the relevant controls and it is considered that appropriate mitigation measures can be put in place to minimise any identified risks.

Based on the specialist studies and extensive investigations carried out for the proposed development, the following conclusions are made:

- **Statutory Context**

The proposal is entirely consistent with the objectives of the EP&A Act. The appropriateness of the proposed development is also demonstrated through compliance with the CLEP 2021, in that it achieves the employment generating outcomes envisaged for the E4 zone, with minimal impact on surrounding uses and environments.

- **Estimated Development Cost and Employment**

The proposed development would provide new employment opportunities through the provision of a warehouse and distribution centre to an underutilised industrial land holding. This includes a total of approximately 1,429 jobs during the construction phase and 1,025 jobs during the operational phase. The EDC for the proposal is \$440,630,000.

- **Design Quality**

The proposed development responds to the seven (7) objectives for good design in *Better Placed*.

- **Built Form and Urban Design**

Careful consideration has been given to the evolving future character of the existing industrial area. The development has been designed to serve as unified and succinct warehouse facility, subdivided into three (3) main buildings, while using the subject site more efficiently. The design for the mezzanine carparking deck further provides an efficient use of the site, which results in more outdoor amenity and landscaped areas.

The proposed development provides a suitable urban design outcome that meets the objectives of the E4 zone and complements the existing Smithfield Industrial Estate.

- **Visual Impact**

The proposed development will cause a change in the view for surrounding properties. It is acknowledged that the sensitivity of visual receivers in the immediate context is low due to the existing industrial character. Though the development is of greater bulk and scale than the existing facility, the magnitude of change is partially mitigated by the retention of many of the existing trees to the boundaries of both Britton Street and Percival Road. These in



combination with proposed additional landscaping, careful selection of materials and colours, and a high-quality architectural façade design ensure the visual impacts associated with the proposal are acceptable.

▪ **Traffic, Transport and Accessibility**

The proposed development is expected to have a minor impact on the surrounding road network during peak periods, as a result of the increased traffic generation. Road upgrades or infrastructure works in the surrounding road network are not considered to be required to accommodate the proposed development.

Car parking and bicycle parking proposed on the subject site are compliant with the rates identified under the *Cumberland Development Control Plan 2021* (CDCP 2021). Proposed loading and access arrangements are also compliant with the CDCP 2021.

▪ **Trees and Landscaping**

A total of 252 trees are proposed to be removed due to project impacts. This comprises:

- 38 high retention value trees;
- 48 medium retention value trees; and
- 166 low retention value trees. This also includes 15 Council street trees along Percival Road and Britton Street.

In addition, 77 trees are recommended to be removed irrespective of development due to their poor health and/or structural condition and/or weed status. These trees are exempt under the CDCP 2021 and therefore do not require development consent for their removal.

To offset the impacts arising from the tree loss, a site-wide Landscape Plan has been prepared. The resulting landscape characteristics of the proposed development include:

- A landscaped area of 13,428m², representing 15.31% site coverage;
- A total of 215 new trees and 12 tree ferns to be planted;
- A total of 28 trees to be incorporated into the outdoor amenity area; and
- A total canopy cover of 7,898m², representing 9% site coverage.

▪ **ESD**

The vision for the proposed development is to create a world class facility for industrial businesses with an emphasis on design quality, sustainability, innovation and a complementary mix of estate occupants. The development will incorporate various sustainable design and construction initiatives to ensure it meets the requirements outlined in the SEARs, industry standards, and the sustainability pillars set by the NSW Government's Net Zero Plan. Embodied emissions attributed to the proposed development have been quantified.

▪ **Biodiversity**

The biodiversity assessment of the subject site confirms that the vegetation proposed to be removed is geographically restricted to areas that are substantially distanced from the subject site, were cultivated for use in landscaping, and are not expected to occur naturally within the area. Furthermore, historical clearance, agricultural land use and further commercial/industrial modification of the subject site has resulted in existing low-quality habitat for fauna. The assessment concludes that the proposal is unlikely to result in an adverse effect on any threatened species.



▪ Air Quality

The air quality assessment concludes that the construction phases can be adequately managed so that the short-term and temporary dust related impacts will remain to be low risk.

Dispersion modelling of the operational phase was carried out and it was concluded that no exceedances of the relevant air quality criteria are predicted to occur as a result of the proposed operations. Therefore, operation of the proposed development is not expected to adversely affect sensitive receptors.

▪ Noise and Vibration

The operational noise assessment predicts there will be no exceedances of the relevant noise criteria at any of the identified receivers. During the construction phase, no exceedances to Noise Management Levels (NMLs) are predicted at the industrial receivers or the suburb of Greystanes, assuming standard construction hours. Minor exceedances are predicted at the nearest receivers in the suburb of Woodpark during standard hours and a Construction Noise and Vibration Management Plan (CNVMP) will be developed to mitigate these effects.

No construction vibration impacts are predicted at residential receivers, provided that safe working distances are implemented. Vibration impacts are possible at neighbouring industrial sites, as well as the pipeline to the north, if vibration intensive equipment is to be operated in close proximity to the site boundary. A CNVMP will be developed to mitigate these effects.

▪ Ground and Water Conditions

The groundwater measured from the monitoring wells indicates that the groundwater level is approximately 5m below the proposed excavation levels. It is assessed from the measured groundwater levels, that the risk of impact on groundwater and associated groundwater receptors due to the cut and fill earthworks is negligible.

▪ Water Management

The proposed stormwater quality treatment system, incorporating the use of a treatment train of pit-filter baskets, proprietary filtration and bioretention, is proposed to mitigate any increase in stormwater pollutant load generated by the proposed development. Best management practices have been applied to the development to ensure that the quality of stormwater runoff is not detrimental to the receiving environment.

The proposed development does not increase runoff from existing conditions and, as such, the site discharge will not adversely affect any land drainage system or watercourse.

▪ Flooding Risk

The proposed development achieves acceptable flood risk, flood planning and flood impact requirements. The subject site is categorised as low flood hazard and the buildings will be constructed above the flood planning level, ensuring low residual risk of damage from flooding and safety of the occupants of the building. A detailed flood risk assessment has been completed, ensuring the existing flow paths and flood behaviour is not altered and the potential flood affection on the upstream properties is not increased.



▪ Hazards and Risks

A review of the quantities of dangerous goods that may be stored at the proposed facility and the associated vehicle movements was conducted both for individual tenancies and for a cumulative effect across the warehouse. The results of the analysis indicate the threshold quantities for dangerous goods that may be stored and transported are not exceeded. Furthermore, a review of the potential to cause offense was conducted which indicated the site operations would be unlikely to result in noise or odour to occur at levels which would cause offense.

▪ Contamination and Remediation

Contamination investigations have been undertaken across the subject site and these investigations did not identify the need for any remediation. However, some intrusive investigations were not able to be completed, due to the existing food manufacturing facility and potential contamination of food. Therefore, these data gaps will need to be addressed once the food manufacturing operations cease. A Remedial Action Plan (RAP) has been prepared, which provides the framework for future investigations, as well as site remediation (if required). Subject to the suitable implementation of the measures described in the RAP, it is concluded that the site will be, or can be made suitable for the development and that the risks to the environment can be appropriately protected during the works.

▪ Waste Management

A Waste Management Plan (WMP) has been prepared for the proposal, which addresses the likely waste streams generated during demolition, construction and operation, provides indicative estimations of waste quantities, and proposes reuse, recycling and disposal procedures to be implemented as part of the proposed development.

▪ Aboriginal Cultural Heritage

Review of background information, existing assessments and database searches have established that no archaeological sites containing Aboriginal objects are known to exist within the boundaries of the proposal site. Furthermore, the extensive and ongoing industrial development of the area has led to heavy disturbance and modification of the site, drastically limiting the potential for in situ cultural materials to be present.

▪ Environmental Heritage

The subject site is not listed on the State Heritage Register or identified as an item of environmental heritage under the CLEP 2021.

▪ Social Impact

Long term socio-economic impacts of the proposal are expected to be positive, through the creation of employment opportunities. The proposal is expected to have the greatest negative impact during the construction phase, which will be temporary and limited to the subject site's immediate surroundings. This can be managed through the implementation of appropriate mitigation measures.

▪ Infrastructure Requirements and Utilities

The proposed development can be adequately serviced and does not necessitate any infrastructure upgrades.



▪ Contributions and Public Benefit

Contributions will be required for the proposed development, in accordance with the *Cumberland Local Infrastructure Contributions Plan 2020* and the *Environmental Planning and Assessment (Housing and Productivity Contribution) Order 2023*.

▪ Engagement

A comprehensive level of community and stakeholder engagement has been undertaken for the proposed development, and feedback has been incorporated, where practicable.

Justification for the Proposed Development

A thorough consideration of the environmental impacts of the proposal has been undertaken in the environmental impact assessment process and in the preparation of the EIS. In assessing the impacts of the proposed development, consideration has been given to social, economic and environmental matters. All assessed impacts have been examined and deemed acceptable, in relation to all the relevant legislative requirements applicable to the subject site.

The proposed development aligns with the objectives of the strategic planning documents, including *A Metropolis of Three Cities – Greater Sydney Region Plan*; *the Central City District Plan*; *the Cumberland 2030: Our Local Strategy Planning Statement*; *the Cumberland Employment and Innovation Lands Strategy 2019*; and *the Future Transport Strategy 2056*. The proposal would contribute to employment generation in an area already earmarked for employment through both State and Regional planning policies.

Based on the findings of this EIS, the subject site can successfully support the proposed warehouse and distribution centre, inclusive of related development and operations, with acceptable environmental impacts. The proposed development is a logical addition to the existing Smithfield Industrial Estate. Given the above reasons and the satisfaction of both of the objects of the EP&A Act and the aims of the CLEP 2021, it is recommended that the proposed development, for the purposes of a warehouse and distribution centre, be supported subject to relevant and reasonable conditions.



PART 1 INTRODUCTION

1.1 INTRODUCTION

This EIS has been prepared by Willottree Planning, on behalf of Lendlease. The EIS is submitted to DPHI in support of an application for SSD, for the construction and operation of a warehouse and distribution centre, including site preparation works, and the provision of infrastructure at 15 – 21 Britton Street and 28 – 54 Percival Road, Smithfield (Lot 1 DP 597082 and Lot 34 DP 617521).

The general particulars of this proposal are summarised below:

- Site preparation and establishment works, including:
 - Demolition of existing buildings and structures;
 - Clearing of nominated vegetation within the proposed development area;
 - Bulk earthworks to create proposed site levels;
 - Decommissioning of existing vehicle crossings; and
 - In-ground building services and utility work.
- Construction and operation of three (3) multi-level warehouse buildings across the two (2) allotments, comprising the following:
 - Two (2) two-storey warehouse buildings located on Lot 34 DP 617521 (Warehouse A and B), comprising of 12 individual warehouse units and ancillary office;
 - A three-storey building located on Lot 1 DP 597082 (Warehouse C), comprising of 9 individual warehouse units, ancillary office, and a café;
 - Shared outdoor amenity areas provided for employees on level 1;
 - Connected hardstand on ground floor and level 1 that will allow for vehicle circulation across the whole site;
 - A total of 482 carparking spaces within three separate carparking areas;
 - A total Gross Floor Area (GFA) of 96,568m², including 88,976m² of warehouse, 7,036m² of office, 71m² of café, 220m² of end of trip facilities and 265m² of shared amenities;
 - Four (4) new vehicle crossings on Percival Road and four (4) new vehicle crossings on Britton Street to provide separate entry and exit for heavy and light vehicles; and
 - Extensive ground and on-building landscaping works.

The proposal has an EDC of \$440,630,000 and would generate approximately 1,429 direct construction jobs and approximately 1,025 operational jobs for the proposed facility.

This EIS describes the subject site and proposed development. It also responds to the SEARs and assesses the proposed development in terms of all relevant matters set out in legislation, EPIs and associated planning policies.

The structure of this EIS has been prepared in accordance with DPHI's *State Significant Development Guidelines – Preparing an Environmental Impact Statement* as follows:

- **PART 1 INTRODUCTION**
- **PART 2 STRATEGIC CONTEXT**
- **PART 3 PROJECT DESCRIPTION**
- **PART 4 STATUTORY CONTEXT**
- **PART 5 ENGAGEMENT**
- **PART 6 ASSESSMENT OF IMPACTS**
- **PART 7 PROJECT JUSTIFICATION**

1.2 STATUTORY REQUIREMENTS

The relevant statutory requirements of the proposal are suitably addressed in **Appendix C** of this EIS.



1.3 MANDATORY CONSIDERATIONS

Mandatory matters for consideration by the consent authority are outlined in **Section 4.1.1** of this EIS.

1.4 SUPPORTING PROJECT DOCUMENTATION

Documents provided in support of the proposal are outlined in **TABLE 1**.

TABLE 1: DOCUMENT SCHEDULE		
Appendix No.	Document Title	Consultant
Appendix 1	SEARs	-
Appendix 2	Estimated Development Cost Report (EDC Report)	RLB
Appendix 3	Title Documents	NSW Land and Registry Services
Appendix 4	Architectural Drawings	SBA Architects
Appendix 5	Design Report	SBA Architects
Appendix 6	Survey Plan	Boxall
Appendix 7	Building Code of Australia Compliance Report (BCA Report)	BM+G
Appendix 8	Accessibility Report	ABE Consulting
Appendix 9	Visual Impact Analysis (VIA)	Geoscapes
Appendix 10	Transport and Accessibility Impact Assessment (TAIA) (including Construction Traffic Management Plan and Green Travel Plan)	Arup
Appendix 11	Landscape Plan	Geoscapes
Appendix 12	Ecologically Sustainable Development Report (ESD Report)	Cundall
Appendix 13	Biodiversity Development Assessment Report (BDAR)	écologique
Appendix 14	Air Quality Impact Assessment (AQIA)	RWDI
Appendix 15	Noise and Vibration Impact Assessment (NVIA)	RWDI
Appendix 16	Geotechnical Assessment	Douglas Partners
Appendix 17	Civil Engineering Report and Water Cycle Management Strategy	Costin Roe Consulting
Appendix 18	Infrastructure Delivery, Management and Staging Plan	Land Partners Surveyors and Planners
Appendix 19	Preliminary Risk Screening	Riskcon Engineering
Appendix 20	Detailed Site Investigation (DSI)	Senversa
Appendix 21	Remedial Action Plan (RAP)	Senversa
Appendix 22	Waste Management Plan (WMP)	Senversa
Appendix 23	Hazardous Materials Survey	Senversa
Appendix 24	Aboriginal Cultural Heritage Assessment (ACHA)	Austral Archaeology
Appendix 25	Statement of Heritage Impact (SOHI)	Austral Archaeology
Appendix 26	Arboricultural Impact Assessment (AIA)	Canopy
Appendix 27	Social Impact Assessment (SIA)	HillPDA
Appendix 28	Engagement Report	HillPDA



Appendix 29	Cumberland Development Control Plan 2021 (CDCP 2021) Assessment	Willowtree Planning
Appendix 30	Industry and Employment SEPP Assessment	Willowtree Planning
Appendix 31	Embodied Emissions Materials Form	RLB
Appendix 32	Net Zero Statement	Cundall
Appendix 33	NABERS Agreement	NSW Government

1.5 ESTIMATED DEVELOPMENT COST

The EDC of the proposed development, in accordance with the EDC definition under the *Environmental Planning & Assessment Regulation 2021* (EP&A Regulation), is estimated to be \$440,630,000.

An EDC Report, prepared by RLB, is included in **Appendix 2**. Employment numbers derived from this report are summarised below.

1.6 EMPLOYMENT NUMBERS

The following employment numbers are estimated for the proposal.

1.6.1 Construction Jobs

The entire construction phase of the project has a forecasted perceived employment contribution throughout the community of 1,429 jobs during the life of the project, comprising:

- Direct employment on site: 986 jobs
- Manufacturing and supply of intermediate goods and services: 293 jobs
- Indirect supply of goods and services: 150 jobs

1.6.2 Operational Jobs

An estimate of the employment from the operational phase of the project has been undertaken by RLB. The employment output represents that for each 186m² of conventional warehouse area, one year of full-time employment is created. For each 14m² of office space, one year of full-time employment is created. The project specifics are outlined below:

- A total of 88,976m² of GFA of warehouse space: 478 jobs
- A total 7,592m² of GFA of admin, logistics and retail: 547 jobs

In total, the project has a forecast perceived employment contribution of 1,025 full-time jobs per year.

1.7 THE PROPONENT

TABLE 2 below outlines the relevant details of the proponent.

TABLE 2: PROPONENT CONTACT DETAILS	
Company Details	Lendlease Real Estate Investments as responsible entity for Australian Prime Property Fund Industrial
ABN	19 564 580 775
Contact Name	Richard Bradley
Position	Development Director



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Email Address

richard.bradley@lendlease.com

1.8 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

An application requesting industry-specific SEARs was submitted to the DPHI (reference: SSD-67368956). The SEARs were subsequently issued by DPHI on the 13th February 2024 and are addressed by this EIS.

For reference, the industry-specific SEARs, as issued, are annexed in **Appendix 1** of this EIS. An overview of how the SEARs have been satisfied are outlined in **Appendix A**.

PART 6 of this EIS provides a detailed environmental risk assessment of all SEARs items.

This EIS is also consistent with the minimum requirements for an EIS, as set out in Division 5 of the EP&A Regulation and has considered the *State significant development guidelines – preparing an environmental impact statement*.



PART 2 STRATEGIC CONTEXT

2.1 SITE LOCATION & EXISTING SITE CHARACTERISTICS

The identified portion of land, that is the subject of this EIS is located at 15-21 Britton Street and 28-54 Percival Road, Smithfield, which is made up of the following land holdings:

TABLE 3. SITE IDENTIFICATION		
Site Address	Legal Description	Land Area
15-21 Britton Street, Smithfield	Lot 1 DP 597082	32,475m ²
28-54 Percival Road, Smithfield	Lot 34 DP 617521	55,240m ²
TOTAL:		87,715m²

The subject site is located within the Smithfield Industrial Estate and is bound by established warehouse buildings and industrial land uses. The subject site is made up of two (2) allotments which currently operate independently. The western allotment (Lot 1 DP 597082) has a frontage to Britton Street of approximately 270m. It comprises a warehouse building, currently operating as a food processing and packaging facility and associated offices. Ancillary buildings and structures, including a wastewater treatment plant, are positioned towards the northern boundary.

The western boundary comprises a landscaped area of mature trees which extend along the entire Britton Street frontage. An area of hardstand provides at-grade car parking at the southern end of the subject site. Vehicular access to the subject site is provided via Britton Street to the north via a controlled gate with egress provided to the south of the subject site. A separate vehicle access to the car park is also provided via Britton Street to the south. Three (3) existing vehicle crossings are located on the Britton Street frontage.

The eastern allotment (Lot 34 DP 617521) has a frontage to Percival Road of approximately 210m and comprises two (2) warehouse buildings and a separate two-storey office building. An area of hard stand provides at-grade car parking at the northern end of the subject site and a landscaped area of mature trees exists at the southern edge. Primary vehicular access to the subject site is provided via an entrance off Percival Road for both heavy vehicles and visitors. A secondary entrance is provided at the southern edge of the subject site. A total of two (2) existing vehicle crossings are located on the Percival Road frontage.

Land surrounding the subject site includes predominantly warehouse and industry-type developments, all of which are zoned E4: General Industrial under the CLEP 2021. Surrounding land uses in the immediate vicinity include:

- **North** – The subject site directly adjoins the Prospect Reservoir water supply pipelines on the northern boundary. This includes two (2) large above ground pipes, that are mapped as a State Heritage Item. Directly north of the pipelines is the Liverpool-Parramatta Transitway, which is a bus-only road between Parramatta and Liverpool. Industrial land continues north of the Transitway for approximately 500m and residential land use is located north of this.
- **South** – Directly to the south of the subject site is a large warehouse, primarily used for Storage King. Adjoining this to the west is the Tait Street Park, which is a dedicated Council Reserve area. The Cumberland Highway is located on the southern side of these allotments. The Prospect Creek is located approximately 500m south of the subject site, which acts as a natural border for the industrial precinct. Residential land use is located south of the Prospect Creek.
- **East** – To the east of the subject site is further industrial land, which extends for approximately 940m. Directly opposite the subject site on Percival Road is a steel distribution warehouse.



- **West** – Directly to the west of the subject site is further industrial land, which extends for approximately 1750m. Opposite the subject site on Britton Street are a number of smaller developments, that include warehouses for manufacturing purposes.

An aerial image of the subject site is depicted in **Figure 5** and the surrounding context is depicted in **Figure 6**. Photographs of the subject site are depicted in **Figure 7**.



Figure 5. Subject Site (Source: NearMap, 2024)

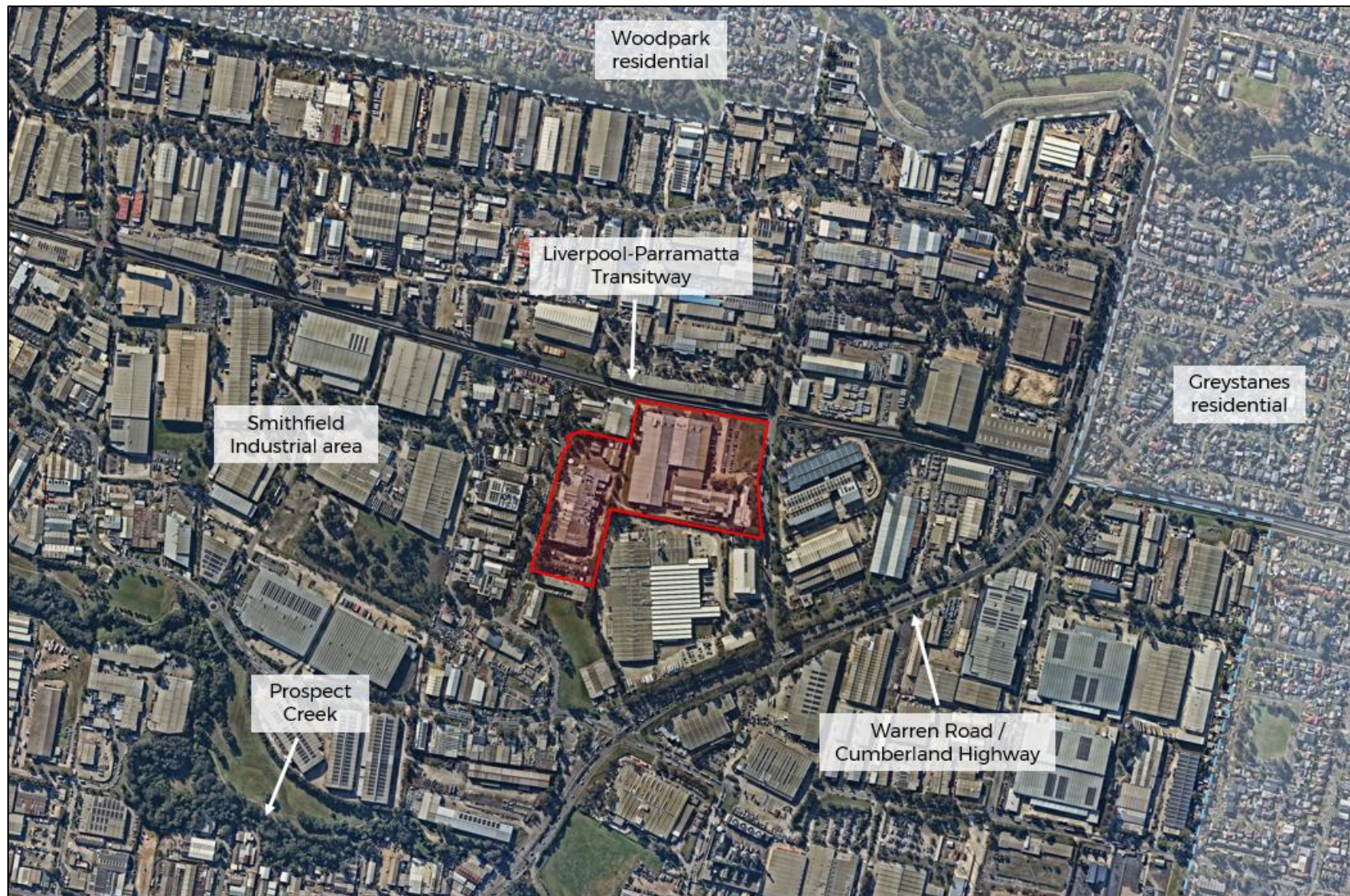


Figure 6. Existing Site Context and Surrounding Area (Source: Willowtree Planning, 2024)



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View of site looking across from Britton Street (google maps)



View of site from Percival Road (google maps)



View from Britton Street onto the neighbouring buildings (google maps)



View from Percival Road looking onto neighbouring buildings (google maps)

Figure 7. Existing Site Photographs (Source: SBA Architects Design Report, 2024)



An overview of the subject site's characteristics is included in **TABLE 4**, as follows.

TABLE 4: SITE CHARACTERISTICS	
Component	Description
Address and legal description	15-21 Britton Street and 28-54 Percival Road, Smithfield Lot 1 DP 597082 and Lot 34 DP 617521
Site area	87,715m ²
Current use	Existing industrial operations, including: - Storage and distribution of dangerous goods - Food manufacturing and packaging - Civil contracting warehouse - Manufacturing of plastics and thermal insulation - Research laboratory - Ancillary offices
Topography and Geology	Topography on the eastern allotment is slightly sloping from the front boundary (approximately 33m RL) to the rear boundary (approximately 28m RL). Topography on the western allotment is relatively flat at approximately 26m RL, however a landscaped bund exists along the street frontage. The allotments are currently separated by a retaining wall as the existing uses operate independently. As described in the Geotechnical Assessment (Appendix 16), the general subsurface profile, as indicated by Cone Penetration Tests (CPTs) is outlined below: - Pavement: Asphalt pavement or concrete slab between 50mm to 220mm. - Fill: Variably comprising silty clay, clay, silty sand, clayey sand, gravelly sand encountered to depths of between 0.4m to 1.8m. - Alluvial Soil: Soft clay to 2.2m depth over clayey sand / sandy clay to 3.1m, or firm to stiff clay to 2.9m depth. - Residual Soil: Stiff to hard clay with ironstone gravels encountered to depths of between 1m and 2.5m over the eastern, central and southern sides of the site, increasing to about 5m depth in the north-eastern quadrant.
Salinity	The subject site is identified as containing "moderate salinity" land. As described in the Geotechnical Assessment (Appendix 16), soil testing show that 'non-saline' and 'slightly saline' soil conditions are present at the subject site.
Infrastructure	Potable water: A 150mm water main is laid on the eastern side of Britton Street and services the western allotment. A 375mm trunk water main and a 500mm trunk water main is laid within Percival Road, but these mains are not available for connections.
	Wastewater: A 225mm reticulation line exists within the western allotment. A section of the 225mm sewer currently extends into the eastern allotment.
	Electricity: High voltage overhead and underground electrical systems service the subject site. Ten existing padmount substations exist within the subject site with a combined capacity of approximately 10MVA.



TABLE 4: SITE CHARACTERISTICS

Component	Description
	Gas: Jemena have a 1,050kPa high pressure gas reticulation laid in Britton Street and Percival Road. Telecommunications: Substantial fibre optic cable systems exist within both Britton Street and Percival Road and the existing buildings are serviced by this.
Access	Two (2) existing vehicle crossings on Percival Road and three (3) existing vehicle crossings on Britton Street.
Vegetation	A total of 454 trees have been identified on the subject site or on neighbouring boundaries (refer to the Arboricultural Impact Assessment in Appendix 26). Approximately 312 of these trees are protected under the CDCP 2021, whilst 142 trees are considered exempt. The subject site features a diverse array of trees, including indigenous, native, and exotic species. Primarily, in situ trees were intentionally planted. However, <i>Olea europaea</i> subsp. <i>cuspidata</i>, an exotic tree species with self-seeding tendencies, is likely spreading naturally throughout the site.
Watercourses	There are no watercourses located within the subject site. The nearest watercourse is located approximately 500m south of the subject site, which is known as the Prospect Creek.
Wetlands	No mapped local or important wetlands occur within the subject site. The closest mapped wetland site is located approximately 1.2km west of the subject site, along the Prospect Creek.
Biodiversity	The subject site is mapped as containing “terrestrial biodiversity” values, as indicated in Figure 8 below. The trees and vegetation within this area were removed as part of a previous Development Consent (reference: DA/2017/355/1) and the mapping has not been updated. The subject site does not contain any areas mapped as outstanding biodiversity value in accordance with the <i>Biodiversity Conservation Act 2016</i> (BC Act).  Figure 8. Terrestrial Biodiversity Map (Source: NSW Legislation, 2024)

TABLE 4: SITE CHARACTERISTICS

Component	Description
Easements and encumbrances	The subject site is burdened by a number of easements and encumbrances, pertaining to various infrastructure services. Further details are included in Section 2.5 of this EIS.
Heritage	The study area has been subject to an ACHA. No Aboriginal Cultural material, objects, or places were identified within proximity or within the study area during the preparation of the AHCA. The subject site is not listed on the State Heritage Register (or subject to an interim heritage order) under the <i>NSW Heritage Act 1977</i> and is not identified as an item of environmental heritage or heritage item under the CLEP 2021. Directly adjacent the subject site to the north is the Prospect Reservoir water supply pipelines, which are identified on the State Heritage Register as “reticulated water supply canal and associated works”.

2.2 SITE CONTEXT

The subject site is located in the suburb of Smithfield and is part of the Cumberland LGA. The subject site is situated approximately 24km west of the Sydney CBD. It is within close proximity to transport infrastructure routes, including the Cumberland Highway, which has direct access from Percival Road to the south. Public transport options are also available, with the Liverpool-Parramatta Transitway located directly north of the subject site.

The nearest sensitive land uses comprise the R2 Low Density Residential zone located 560m north of the subject site and 590m east of the subject site. A public reserve is located just south of the subject site. Surrounding land use zoning is depicted in **Figure 9**.



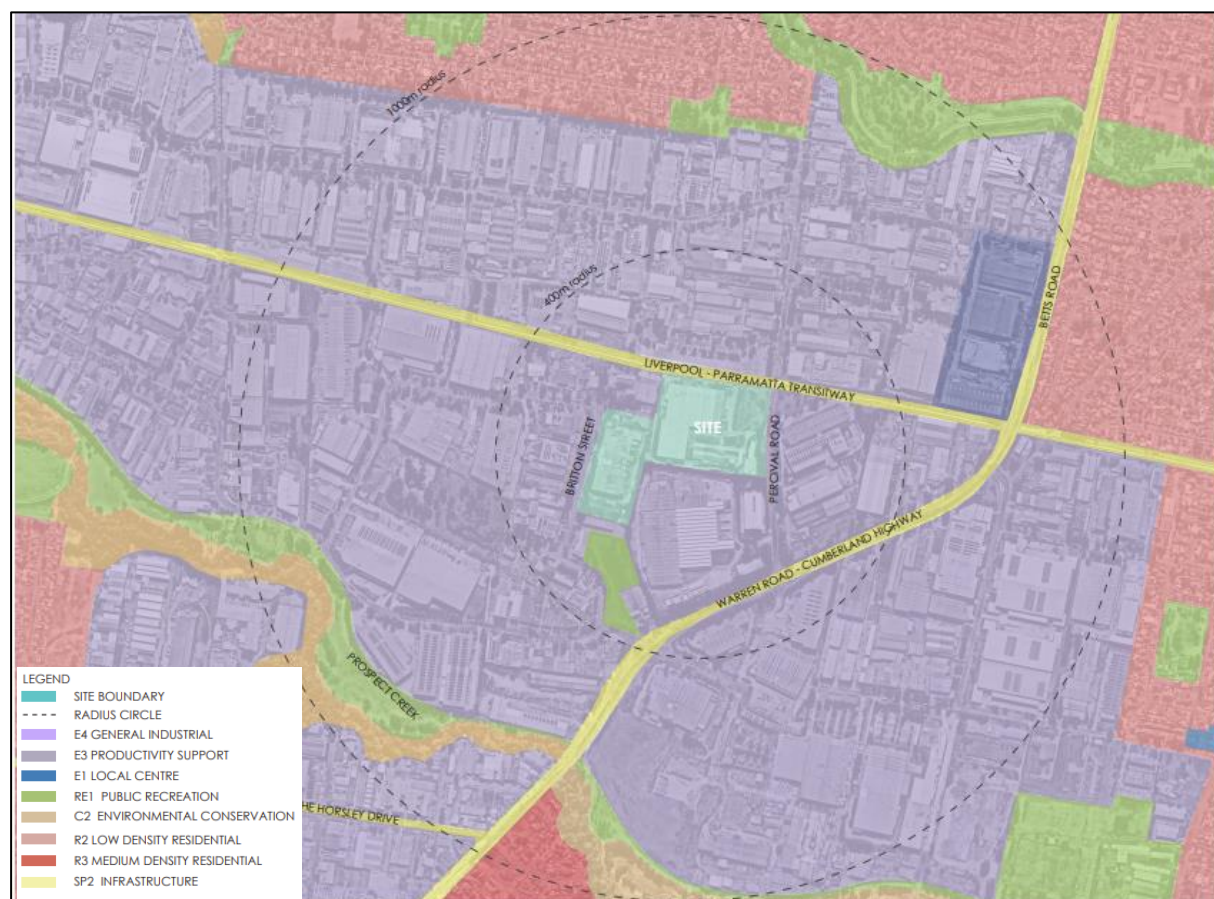


Figure 9. Site Analysis (Source: SBA Design Report, 2024)

2.3 DEVELOPMENT HISTORY

TABLE 5 below provides a summary of previous development applications pertaining to the subject site that have been approved.

TABLE 5. DEVELOPMENT HISTORY		
DA Reference	Summary	Determination Date
Britton Street (Lot 1 DP 597082)		
DA2022/0049	Replace popcorn processing operations with pellet processing operations and installation of two external stacks associated with the heat burner / exchanger.	9 May 2022
DA2017/100/1	Use of the existing wastewater treatment plant and upgrade of wastewater treatment plant including installation of a 300kl balance tank	3 July 2017
DA2007/769/01	Conversion of finger dock on southern side of existing building into a covered storage area	26 November 2007
DA2007/371	Upgrade of wastewater treatment plant	20 July 2007
DA2006/424	Demolition of an existing shed and erection of a new storage shed	9 May 2006
DA2001/476	Internal additions and alterations to an existing snack foods manufacturing plant	25 August 2001
DA97/348	Extension to existing maintenance store and erection of a new waste storage building	17 December 1997

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DA89/278	Installation of two palm oil storage tanks having a combined capacity of 280,000 litres	18 September 1989
DA85/221	Extension of the existing factory and warehouse	12 September 1985
DA83/51	Extensions and modifications to an existing snack foods factory and the construction of a water treatment plant	24 March 1983
DA82/133	Erection of a security store for the storage of goods	24 June 1982
DA82/133	Erection of a gate house	24 June 1982
Percival Road (Lot 34 DP 617521)		
DA2022/0086 and DA2022/0086/1	Construction of a replacement retaining wall along part of the western boundary	23 May 2022
DA2017/355 and DA2017/355/1	Construction of a warehouse and distribution facility, reconfiguration of car parking, removal of trees and associated works. This consent was activated through the removal of some existing vegetation. However, through the process, the Proponent acquired the Britton Street lot to the west, which ultimately led to a new design involving both allotments. Therefore, the remainder of this consent has not been implemented.	26 July 2018
DA2017/353	Fit out and change of use of an existing warehouse (Building B1) for storage and distribution of dangerous and non-dangerous goods. Currently operating as Dangerous Goods Logistics (DGL)	22 January 2018
DA2016/425	Internal fit out and change of use of an existing warehouse to a food manufacturing and packaging facility, operating 24 hours per day, 7 days per week	6 April 2017
DA2009/405	Use of part of Building A for manufacturing of cosmetics and skin care products	23 February 2010
DA2005/797	Alterations/additions to part of ground floor of existing 2 storey office building including the installation of equipment and cool rooms, erection dividing wall to the foyer and its use for research and processing of microbial cultures and associated activities. Currently operating as Microbial Screening Technologies	27 March 2006
DA2000/725	Refurbishment of existing first floor office	7 February 2000
DA1999/768	Factory alterations & additions	22 February 1999
DA1999/767	Addition to factory unit	22 February 1999
DA1989/152	Extension of the existing office building to be used for offices, research and development; the extension of the existing canteen at mezzanine level; the erection of an awning to be used for all weather loading; and the erection of a pallet store	24 May 1989
DA1988/121	Extension to the existing factory building and	4 May 1988



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	the erection of an awning	
DA 1986/240	Erection of first floor offices within the existing food processing warehouse/factory	7 November 1986

2.4 LAND OWNERSHIP

The land that is the subject of this application, is owned by the following entities.

TABLE 6: REGISTERED LANDOWNERS	
Lot/DP	Registered Landowner
Lot 1 DP 597082	Lendlease Real Estate Investments as responsible entity for Australian Prime Property Fund Industrial
Lot 34 DP 617521	Lendlease Real Estate Investments as responsible entity for Australian Prime Property Fund Industrial

Landowners consent has been obtained.

2.5 EASEMENTS AND ENCUMBRANCES

The encumbrances noted within the Certificate of Title and Deposited Plan for the subject site are summarised in **TABLE 7**.

TABLE 7: ENCUMBRANCES ON TITLE	
Reference	Description and Location
Lot 1 DP 597082	
DP238072	Restrictions on the use of land. The subject site is identified on Page 6 of DP238072 as Lots 49-56, however no restrictions or easements pertain to these lots.
7055651	Easement for padmount substation and underground cables. Located towards the northern end of the subject site at the Britton Street frontage (refer Survey Plan in Appendix 6).
AI662124	Lease to the Real McCoy Snackfood Co Pty Ltd
AI662125	Lease to Snack Brands Industries Pty Ltd and Snack Brands Foods Pty Ltd
Lot 34 DP 617521	
K617804	Easement for pipeline appurtenant to the land above described affecting the land shown so burdened in plan lodged with K617804 (refer Survey Plan in Appendix 6). This relates to a pipeline easement located on the allotment directly south of the subject site on Percival Road. This is not affected by the proposed works.
T466663	Easement for electricity purposes affecting the land shown so burdened in DP117575. This is located at the Percival Road frontage (refer Survey Plan in Appendix 6).
U974771	Lease to Prospect Electricity of Substation Premises No.9700 together with an easement for electricity purposes. This runs along the northern boundary of the subject site (refer Survey Plan in Appendix 6)
AB887347	Lease to Microbial Screening Technologies Pty Ltd
AN285486	Lease to DGL Group Pty Ltd
AN615195	Lease to Australian Building Industry Civil Contractors Pty Ltd



TABLE 7: ENCUMBRANCES ON TITLE

Reference	Description and Location
AN615197	Lease to 8 Pulses Food Company Pty Ltd
AS557298	Lease to Sancell Pty Ltd
AS583104	Lease to Rehab Care Pty Ltd
AS616955	Lease to CRL Leasing Pty Ltd

It is acknowledged that the easements above relating to electricity infrastructure will likely be distinguished and new easements will be implemented once the electricity infrastructure has been relocated. Engagement is ongoing with Endeavour Energy in this regard.

2.6 RELEVANT FUTURE PROJECTS

The following projects have been identified within close proximity of the subject site, and are currently under assessment with the DPHI:

- **SSD-19425495: Smithfield Recycling Centre (132 – 144 Warren Road, Smithfield):** Use of an existing warehouse (operating 24 hours 7 days a week) to receive up to 150,000 tonnes per annum of domestic and commercial recyclable materials and sort these materials into categories for transportation to dedicated reprocessing facilities.
- **SSD-59325460: Smithfield Battery Energy Storage System (6 Herbert Place, Smithfield):** Construction and operation of a battery energy storage system (72 MW / 260 MWh) at the Smithfield Energy Facility.

There are no large-scale development applications currently under assessment by Cumberland City Council in close proximity to the subject site.

The potential cumulative impacts of the project are addressed in **Section 6.2** of the EIS in accordance with the *Cumulative Impact Assessment Guidelines for State Significant Projects*.

2.7 STRATEGIC PLANNING CONTEXT

2.7.1 Greater Sydney Region Plan – A Metropolis of Three Cities

The *Greater Sydney Region Plan – A Metropolis of Three Cities* divides the Sydney Region into three (3) Cities, with a vision of growth until 2056. The Plan aims to anticipate the housing and employment needs of a growing and vastly changing population. The overall vision pursues an objective of transforming 'Greater Sydney' into a Metropolis of Three Cities, including:

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

The division into three cities puts workers and the wider community closer to an array of characteristics such as, intensive jobs, 'city-scale' infrastructure and services, entertainment and cultural facilities. By managing and retaining industrial land close to city centres and transport, this will ensure critical and essential services are readily available to support local businesses and community members and residents. Once constructed and operational, the subject site would achieve economic growth and prosperity, as well as encourage employment-generating opportunities within an area zoned for such permissible purposes, that is considered relatively close in conjunction to residential communities, providing an ease of commute. The proposed development across the site considers the employment-generating outcomes that can be achieved for the immediate and wider localities.



The proposed development also contributes to the four (4) standardised elements communicated across for all three (3) cities, including:

- **Infrastructure and collaboration** – the proposed development of the subject site for the purposes of a warehouse and distribution centre would facilitate the provision of services to support the wider locality and region;
- **Liveability** – the proposed development encourages employment-generating opportunities and economic prosperity, which has positive influences on the wider locality;
- **Productivity** – the proposed development is situated within the Central City District and is subject to the provisions of the *Central City District Plan* (refer to **Section 2.7.2** below); and,
- **Sustainability** – the proposed development would not exhibit or emit any detrimental impacts to its wider ecological surroundings.

In summary, the subject site and proposed development contributes to the objectives set out in the *Greater Sydney Region Plan – A Metropolis of Three Cities* by promoting minor environmental impacts and the further promotion of technological advancements and employment-generating opportunities to the wider locality and community, positioned within the Cumberland LGA.

2.7.2 Central City District Plan

The subject site forms part of the Central City District, as identified in **Figure 10** below and is subject to the provisions of the *Central City District Plan* (the District Plan). The District Plan is a 20-year plan to manage growth in the context of economic, social, and environmental matters to achieve the 40-year vision of Greater Sydney.

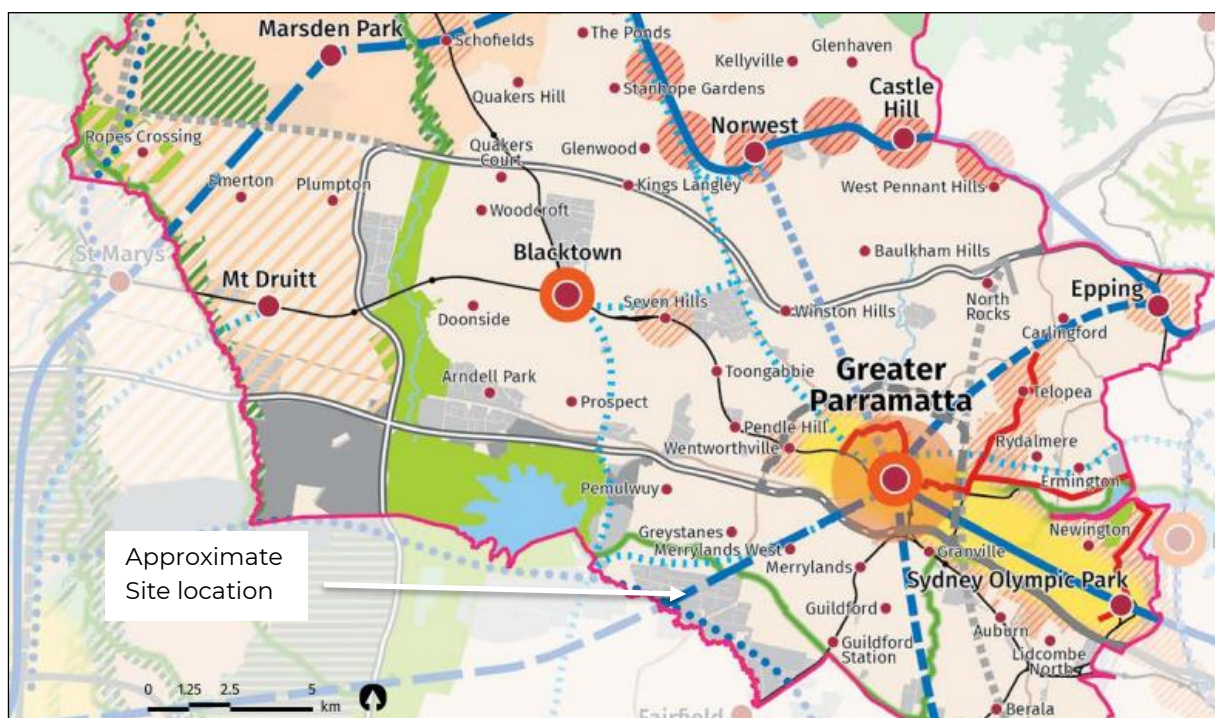


Figure 10. Central City District Plan Structure Plan (Source: GSC, 2018)

The Central City District has 4,656 hectares of industrial and urban services land, which represents the highest proportion of Greater Sydney's total industrial and urban services land stock (approximately 34 per cent). Given the Cumberland LGA's proximity to Greater Parramatta and access to transport and freight routes, the subject site is strategically placed to provide industrial services that support the economic growth of the Central City District.

The District Plan identifies the following priority that is relevant to the proposed development:

- **Planning Priority C11:** *Maximising opportunities to attract advanced manufacturing and innovation in industrial and urban services land.*

The proposal aligns with *Planning Priority C11* as it seeks to redevelop an otherwise dated and rundown industrial site. It will maximise the development opportunities at the subject site, through developing a multi-level warehousing estate, with ancillary uses. Multi-level industrial developments are an emerging land use, that provide a solution to the increasing shortage of available industrial land across the Greater Sydney region. Overall, it is considered that the proposal aligns with the direction of the District Plan.

2.7.3 Cumberland 2030: Our Local Strategy Planning Statement

The *Cumberland 2030: Local Strategy Planning Statement* (the Cumberland Planning Statement) applies to the subject site. The Cumberland Planning Statement identifies the Cumberland LGA as being home to substantial industrial and employment lands accommodating a diverse range of jobs and services. The largest concentrations of employment lands are located in the south-west of the LGA, including the large industrial and warehousing areas at Yennora, Smithfield and Pemulwuy. Cumberland appeals to these sectors as a destination due to accessibility to various distribution catchments across metropolitan Sydney.

The Planning Statement identifies the following priorities that are relevant to the proposed development:

- **Priority 10:** *Supporting a strong and diverse economy across town centres and employment hubs;*
- **Priority 11:** *Promote access to local jobs, education opportunities and care services;*
- **Priority 12:** *Facilitating the evolution of our employment and innovation lands to meet future needs.*

Specifically for the Greystanes Ward, the Cumberland Planning Statement identifies the following strategic considerations:

- *Manage the interface between industrial employment lands and residential areas, and the road transport implications.*
- *Protect and maintain the important industrial and employment lands of Pemulwuy, Smithfield and Yennora.*
- *Maintain the natural environment of Prospect Creek.*

The proposal aligns with the priorities and strategic direction of the Cumberland Planning Statement, as it will develop the existing employment land located within Smithfield. The subject site is located approximately 500m from residential zoned land and therefore does not require specific controls to manage the interface of industrial and residential land. Nonetheless, the proposal would provide high quality design and landscaping that would contribute to an attractive streetscape and improve the amenity of the existing industrial area. The subject site is located more than 500m from Prospect Creek and is not expected to result in any direct impacts on the watercourse. Overall, it is considered that the proposal aligns with the direction of the Cumberland Planning Statement.

2.7.4 Cumberland Employment and Innovation Lands Strategy 2019

The *Cumberland Employment and Innovation Lands Strategy 2019* (the Cumberland Strategy) provides a framework for managing the employment lands of the Cumberland LGA over a 10-year period from 2019-2029. The Cumberland Strategy notes that Cumberland has a distinct competitive advantage in freight and logistics, which provide 18.2% of total employment and contribute significant



industry value. A number of strategic and regional freight road and rail links are provided within the Cumberland area to supplement this sector.

The Cumberland Strategy identifies a number of key emerging trends that are applicable to Cumberland, including:

- *Logistics will remain the dominant driver of demand in Cumberland with new types of warehouse models emerging. Demand for land is expected to be strong including demand for small-scale facilities around centres and existing business zones.*
- *The fitout and configuration of warehouses will evolve in response to the use of robots and emphasis on supply chain efficiencies. Greater heights and floor space ratios (FSRs) may be required, with taller warehouses to process fast-moving goods. In order to commit to the high capital cost to integrate technology into industrial space, occupiers will need to be assured of property tenure and long-term sustainability of the employment precinct.*

The proposed development is consistent with the trends that have been identified above. The height of the proposed buildings has been driven by the relevant height clearances for modern racking systems and warehouse developments. The proposal provides an innovative approach to respond to the shortage of industrial land across the Greater Sydney region, by providing a multi-level estate that includes 21 warehouse tenancies. The tenancies range in size from 2,472m² to 7,812m² and each unit is capable of being combined with a neighbouring unit to create larger spaces, if required. This flexibility enables the building to accommodate both current and future market demands.

The proposed development will support the objectives of the Cumberland Strategy, by providing an innovative development that supports the freight and logistics industry.

2.7.5 Future Transport Strategy 2056

The *Future Transport Strategy 2056* is a 40-year strategy, supported by plans for regional NSW and for Greater Sydney. The strategy and plans focus on the role of transport in delivering movement and place outcomes that support the character of the places and communities that are desired for the future.

The proposed development aligns with the strategies of the *Future Transport Strategy 2056* on the following basis:

- The subject site has access to regular public transport services;
- The subject site is accessible by active transport;
- Parking provision is appropriate for the development and meets the relevant requirements under the CDGP 2021;
- Access, servicing and internal layout will be provided in accordance with Australian Standards AS2890.1-2004 and AS2890.2-2018; and
- The surrounding road network and intersections will be able to cater for the proposed development traffic.

2.8 SITE SUITABILITY

The subject site is located within an established industrial precinct and is zoned E4: General Industrial under CLEP 2021. The proposed development falls within the definition of 'warehouse or distribution centre', being "a building or place used mainly or exclusively for storing or handling items (whether goods or materials) pending their sale, but from which no retail sales are made, and includes local distribution premises", which is permissible with consent in the E4 zone, pursuant to CLEP 2021. The proposed development would facilitate the intended use of the subject site for industrial purposes, which is consistent with the surrounding context.

The subject site is highly-suited to accommodate the intended development based on the following factors:

- CLEP 2021 allows for the proposed development as a permissible use (including ancillary café use);
- The site is readily accessible via the arterial road network, which provides connections to Greater Sydney;
- The proposed development is compatible with surrounding development and local context;
- The subject site can be serviced immediately and at no cost to the Government;
- The proposed development causes minimal impact on the environment;
- The proposed built form is designed to mitigate any impacts on surrounding properties; and
- The proposed development is consistent with the strategic intent of the area.

The following key elements of the site and proposed development are noted:

2.8.1 Visual Impact

The existing landscape value of the subject site is considered negligible due to the present and former uses on the land. The sensitivity of visual receivers in the immediate context is considered to be low. This is due to the industrial character of the surrounding area and the type of people viewing the development. Pedestrian numbers around the subject site are likely to be low and consist mainly of workers from adjacent facilities. Views experienced by passing motorists or people on public transport from adjacent roads are transient, and therefore visual impacts would be less significant. Overall, the surrounding environment is suitable for industrial development.

2.8.2 Infrastructure

The subject site is suitably located with access to infrastructure and utility services – refer to **Section 6.1.21** of this EIS.

2.8.3 Transport and Traffic

The subject site forms part of an established industrial area, bound by Percival Road to the east, Britton Street to the west and the Parramatta Transit-way to the north. The road networks surrounding the subject site includes a combination of state, regional and local roads. Cumberland Highway is the main arterial road closest to the subject site, which provides connection to Greater Sydney via the arterial and motorway network. The Cumberland Highway can be accessed via Percival Road and therefore heavy vehicles would not be required to travel through residential areas.

The capacity of the existing road network is largely determined by the capacity of its intersections to cater for peak period traffic flows. The Signalised & unsignalised Intersection Design and Research Aid (SIDRA) analysis undertaken by Arup has found that the surrounding intersections provide a good level of service, with capacity to cater for the proposed development. Refer to **Section 6.1.6** for further detail.

Public transport around the subject site includes bus services running along the Transit-way and Percival Road. The nearest train station is Guildford Station, which is located 4.5km east of the subject site. Walking and cycling access around the site includes the provision of footpaths and off-road cycleways. Footpaths are provided along Percival Road to connect to the T-way, bus stops and Cumberland Highway, and signalised pedestrian crossings are provided at nearby intersections with Cumberland Highway and the Transit-way. Footpaths are not provided on Britton Street, which is lined with grass verges.

Cycling access around the subject site includes a mixture of on-road and off-road infrastructure. Off-road cycling is permitted along Cumberland Highway via a shared path, where cyclists can then cycle



on-road on Percival Road or Britton Street (via Long Street and Tait Street) to access the site. In the surrounding area, there are separated cycleways along Prospect Creek and the green corridor between Pemulwuy and Guildford West, which are safely separated from moving vehicles.

Overall, the subject site is well served by existing transport infrastructure.

2.8.4 Cultural Heritage

The site has been subject to a detailed and comprehensive assessment in relation to cultural heritage values and a full consultation process with registered Aboriginal stakeholders has been completed.

The ACHA confirms that no Aboriginal cultural materials or sites have been recorded at the subject site. Furthermore, the extensive and ongoing industrial development of the area has led to heavy disturbance and modification of the site, drastically limiting the potential for in situ cultural materials to be present.

Due to the lack of identified tangible heritage, the impacts of the proposed works on Aboriginal heritage values would be considered negligible.

Reference should be made to **Section 6.1.18** of this EIS for further detail.

2.8.5 Stormwater and Flooding

The subject site is categorised as low flood hazard and the building will be constructed above the flood planning level, ensuring low residual risk of damage from flooding and safety of the occupants of the building. A detailed flood risk assessment has been completed, including flood modelling, ensuring the existing flow paths and flood behaviour is not altered nor to not increase the potential flood affection on the upstream properties.

The proposed stormwater quality treatment system incorporating the use of a treatment train of pit-filter baskets, proprietary filtration and bioretention is proposed to mitigate any increase in stormwater pollutant load generated by the development. Best management practices have been applied to the development to ensure that the quality of stormwater runoff is not detrimental to the receiving environment.

Reference should be made to **Section 6.1.13** and **Section 6.1.14** for further detail.

2.8.6 Contamination

Contamination investigations have been undertaken across the subject site and are summarised in **Section 6.1.16** of this EIS, as well as within the DSI (**Appendix 20**). These investigations did not identify the need for any remediation. However, some intrusive investigations were not able to be completed, due to the existing food manufacturing facility and potential contamination of food. Therefore, these data gaps will need to be addressed once the food manufacturing operations cease. A RAP has been prepared, which provides the framework for future investigations, as well as site remediation (if required). Subject to the suitable implementation of the measures described in the RAP, it is concluded that the site will be, or can be made suitable for the development and that the risks to the environment can be appropriately protected during the works.

2.8.7 Summary of Site Suitability

The subject site's consistency with applicable regional and local strategies is demonstrated in the comprehensive environmental assessment, provided in **PART 6** of this EIS, which has been informed by the relevant consultant reports. Accordingly, the environmental assessment prescribes recommendations and mitigation measures (where necessary), to account for all identified potential



impacts, by the proposed development. The suitability of the subject site with regard to the proposed development, can be attributed to its ready ability to provide employment, its excellent access arrangements, its suitable contextual setting, and its minimal impact on the environment.

2.9 PROJECT NEED

The purpose of the proposed development is to provide a warehouse offering, that responds to the intended industrial character and nature of the E4 zone. The proposed development seeks to ensure:

- It is compatible with surrounding development and the local context;
- It would provide development of an otherwise dated land holding;
- It would result in minimal impact on the environment; and
- It would allow for the implementation of suitable mitigation measures, where required.

Overall, the scale of the proposed development is considered suitable, and the built form proposed would completely enhance and renew an undeveloped and underutilised land portion into a modernised warehouse offering.

2.10 CONSIDERATION OF ALTERNATIVES

The options considered and subsequently dismissed, in arriving to the current proposal with regard to the proposed development included:

(a) 'Do Nothing' Scenario

This option was dismissed as the objectives of the proposal would not be met. If the proposed development was not to proceed, the subject site would not achieve its intended development outcome.

(b) Development on an Alternative Site

Consideration was given to carrying out development on alternate sites, these were dismissed as the subject site resulted in the most beneficial outcomes for the proposed development.

Beneficial characteristics of the subject site for the proposed development include:

- Its location, being subject to the provisions of the E4 zone, pursuant to the provisions of CLEP 2021;
- All potential environmental impacts concerning the proposed development are able to be suitably mitigated within the subject site;
- The proximity to the regional road network provides accessibility and linkages to the broader Western Sydney area and wider regions;
- The capability for providing employment-generating opportunities (both directly and indirectly), during both the construction and operational phases;
- It's consistency with the surrounding industrial nature of the area;
- It's large proximity to sensitive receivers; and
- The subject site can be developed with appropriate visual amenity achieved given its surrounding context.

(c) Different Site Configuration

The configuration of the proposed development was chosen based on the subject site's topography, road access, and the requirements of the end user, as well as the need to respond to the character of the surrounding areas.



Different site configurations were explored, with the following key considerations leading to the proposed design:

- Ensuring the most effective and efficient use of valuable industrial land;
- Introduction of appropriate boundary setbacks from the surrounding site context;
- Appropriate layout of truck movement with compliant access;
- Separation of truck, car and pedestrian pathway movements;
- Appropriate location of fire services and brigade set down near the entrance to the subject site;
- Sufficient provision of carparking and bicycle parking within the subject site at safe, secure and convenient locations;
- Efficient creation and proposed operation of the shared hardstand between buildings;
- Creation of a shared outdoor office amenity space; and
- Appropriately located lobby spaces to access both the warehouse and office.

Notwithstanding, the proposed development is justified on the basis that it is compatible with the locality in which it is proposed, resulting in positive social and economic benefits, whilst appropriately managing and mitigating any potential environmental impacts requiring consideration. The proposal also leverages from the availability of existing infrastructure and transport connections.

From a locational perspective, the subject site was chosen as it would be able to accommodate a suitable platform and scale of development proposed. Accordingly, the site's locality is considered satisfactory from a strategic standpoint, for which the proposal responds to the industrial character intended for the subject site and immediate locality; and the limited environmental constraints which make the site suitable for development for the purposes of a warehouse and distribution centre.

In light of the above information, the proposal for a warehouse and distribution centre at the subject site would allow for the site and tenant objectives to be suitably met.

PART 3 PROJECT DESCRIPTION

3.1 OBJECTIVES OF THE PROPOSAL

The aim of the proposed development is to provide a purpose-built warehouse and distribution centre, in line with Industry Best Practice, which would:

- Support the growth and transformation of the industrial sector;
- Generate employment – during construction and once the development is operational;
- Improve access to jobs for residents of the immediate community and wider locality;
- Demonstrate architectural excellence, through siting and design compatibility, with minimal visual impact;
- Provide ancillary activities to support employees on the subject site, including a café; and
- Provide suitable mitigation measures where required, to minimise any unforeseen impacts arising in the future.

3.2 PROJECT OVERVIEW

Development consent is sought for the construction and operation of a multi-level industrial warehouse, pertaining to the following scope of works:

- Site preparation and establishment works, including:
 - Demolition of existing buildings and structures;
 - Clearing of nominated vegetation within the proposed development area;
 - Bulk earthworks to create proposed site levels;
 - Decommissioning of existing vehicle crossings; and
 - In-ground building services and utility work.
- Construction and operation of three (3) multi-level warehouse buildings across the two (2) allotments, comprising the following:
 - Two (2) two-storey warehouse buildings located on Lot 34 DP 617521 (Warehouse A and B), comprising of 12 individual warehouse units and ancillary office;
 - A three-storey building located on Lot 1 DP 597082 (Warehouse C), comprising of 9 individual warehouse units, ancillary office, and a café;
 - Shared outdoor amenity areas provided for employees on level 1;
 - Connected hardstand on ground floor and level 1 that will allow for vehicle circulation across the whole site;
 - A total of 482 carparking spaces within three separate carparking areas;
 - A total Gross Floor Area (GFA) of 96,568m², including 88,976m² of warehouse, 7,036m² of office, 71m² of café, 220m² of end of trip facilities and 265m² of shared amenities;
 - Four (4) new vehicle crossings on Percival Road and four (4) new vehicle crossings on Britton Street to provide separate entry and exit for heavy and light vehicles; and
 - Extensive ground and on-building landscaping works.

The proposed development is further discussed in the following sections and detailed in the architectural drawings prepared by SBA Architects (**Appendix 4**) and landscape plans prepared by Geoscapes (**Appendix 11**). Photomontages of the proposed development are shown in **Figure 11** and **Figure 12**.





Figure 11. Proposed Development Britton Street (Source: SBA Architects, 2024)



Figure 12. Proposed Development Percival Road (Source: SBA Architects, 2024)

3.3 KEY PROJECT DETAILS

The key project details regarding the proposed development are outlined in **TABLE 8** below.

TABLE 8: KEY DEVELOPMENT PARTICULARS	
Project Element	Particular
Site area	87,715m ²
Land use	Warehouse and distribution centre, café
Total GFA	96,568m ²
FSR	1.101:1



TABLE 8: KEY DEVELOPMENT PARTICULARS

Project Element	Particular
Maximum Building Height	- Building A: 28.6m (from FFL and including roof plant) - Building B: 28.6m (from FFL and including roof plant) - Building C: 38.6m (from FFL and including roof plant)
Number of storeys	Two to three storeys
Building Setbacks	<u>Primary street setbacks (Percival Road and Britton Street):</u> 15m building setback 15m landscape strip (excluding areas used for access) <u>Setback at northern boundary:</u> - Approximately 9m 2m landscape strip <u>Setback at southern boundary:</u> - Between 6m – 10m 4m landscape strip
Tree removal	A total of 252 trees are proposed to be removed (not including the trees that are exempt under the CDCP 2021)
Landscaping	13,428m ² (15.31% of the site area)
Proposed canopy cover	7,898m ² (9% of the site area)
Parking spaces	482 carparks (including seven (7) accessible) - Nine (9) Motorcycle parks
Bicycle parking	80
Vehicular access	<u>Britton Street</u> - Two (2) light vehicle crossings for entry and exit - One (1) heavy vehicle crossing for entry - One (1) heavy vehicle crossing for exit <u>Percival Road</u> - Two (2) light vehicle crossings for entry and exit - Two (2) heavy vehicle crossings for exit
Subdivision	Subdivision is not proposed as part of this application
Estimated development cost	\$440,630,000
Operational Details	
Number of staff	Approximately 1,025 employees
Operational Hours	Warehouse and distribution: 24 hours a day, seven days a week Café: 6:30am to 6:00pm, seven days a week
Construction Details	
Construction hours	Monday to Friday – 7:00am to 6:00pm Saturday – 8:00am to 1:00pm No work on Sundays or public holidays



3.4 SITE PREPARATION AND ESTABLISHMENT WORKS

Site preparation activities are proposed to facilitate the proposed development. This includes demolition, tree removal, and earthworks.

3.4.1 Demolition and Tree Removal

The proposal involves the demolition of all existing buildings and structures, including existing hardstand and infrastructure. A total of 252 trees are proposed to be removed due to project impacts. This comprises:

- 38 high retention value trees;
- 48 medium retention value trees; and
- 166 low retention value trees. This also includes 15 Council street trees along Percival Road and Britton Street.

In addition, 77 trees are recommended for removal irrespective of development due to their poor health and/or structural condition and/or weed status. These trees are exempt under the CDCP 2021 and do not require development consent for their removal.

The vegetation impact plan is depicted in **Figure 13**, with the trees proposed to be retained shown in green and the trees proposed to be removed shown in red.



Figure 13. Vegetation Impact Plan (Source: SBA Architects, 2024)

3.4.2 Earthworks

Bulk earthworks are required to provide large flat building pads, hardstand areas, and carparking areas around the subject site. As an additional storey is proposed on the western allotment at lower ground level, this requires excavations up to 6m in depth. The eastern allotment will require filling of up to 7m. This is indicated on the bulk earthworks plan at **Figure 14**.

ENVIRONMENTAL IMPACT STATEMENT

15 – 21 Britton Street, Smithfield
Lot 1 DP 597082 and Lot 34 DP 617521

SSD-67368956

The primary drivers for the proposed earthworks levels are achieving the required flood planning levels as well as creating a pad at a level allowing satisfactory overland flow drainage, sufficient cover above the underground stormwater pipelines, while minimising fill as much as practical.

A high-level earthworks volume estimate has been completed for the proposal and is provided in **TABLE 9**. A detailed assessment of the earthworks will be completed during detailed design stage. A full set of bulk earthworks plans, including sections, have been prepared by Costin Roe and are attached to the Civil Engineering Report at **Appendix 17**.

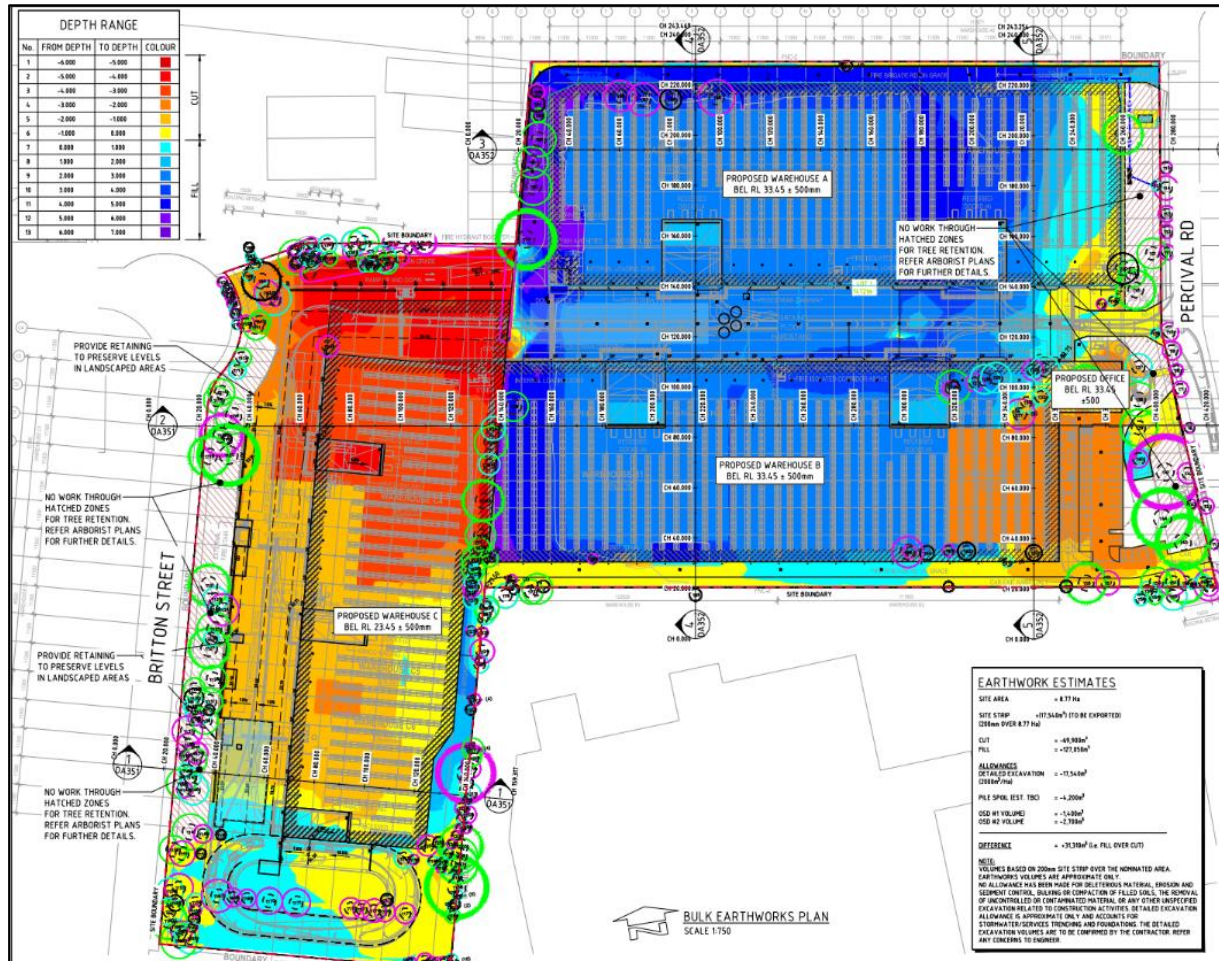


Figure 14. Bulk Earthworks (Source: Costin Roe, 2024)

TABLE 9: EARTHWORKS VOLUMES

Detail	Approximate Volume (+ or – 15%)
Cut (m³)	-69,900
Fill (m³)	+127,050
Detail excavation (2000m³ / Ha)	-17,540
OSD Combined (m³)	-4,100
Pile Spoil	-4,200
Balance (m³)	+31,310

3.4.3 Retaining Walls

The civil engineering objective is to minimise retaining walls within the constraints of the masterplan layout, allowable grading to suit industrial development, and batters in landscaped areas where possible.

Due to the proposed site levels, three (3) retaining walls will be required within the proposed development. This includes:

- Retaining wall 1 will be constructed along the northern boundary of the subject site where it adjoins Lot 48 DP238072. This will be for a length of approximately 117m, at a maximum height of 5m.
- Retaining wall 2 will be constructed along the western boundary, parallel with Britton Street frontage. This will be for a length of approximately 202m and a height of 3m.
- Retaining wall 3 will be constructed generally along the boundaries of the two allotments of the subject site. This will be for a length of approximately 209m, at a maximum height of 10m.

The location of the proposed retaining walls are indicated in yellow in **Figure 15**.

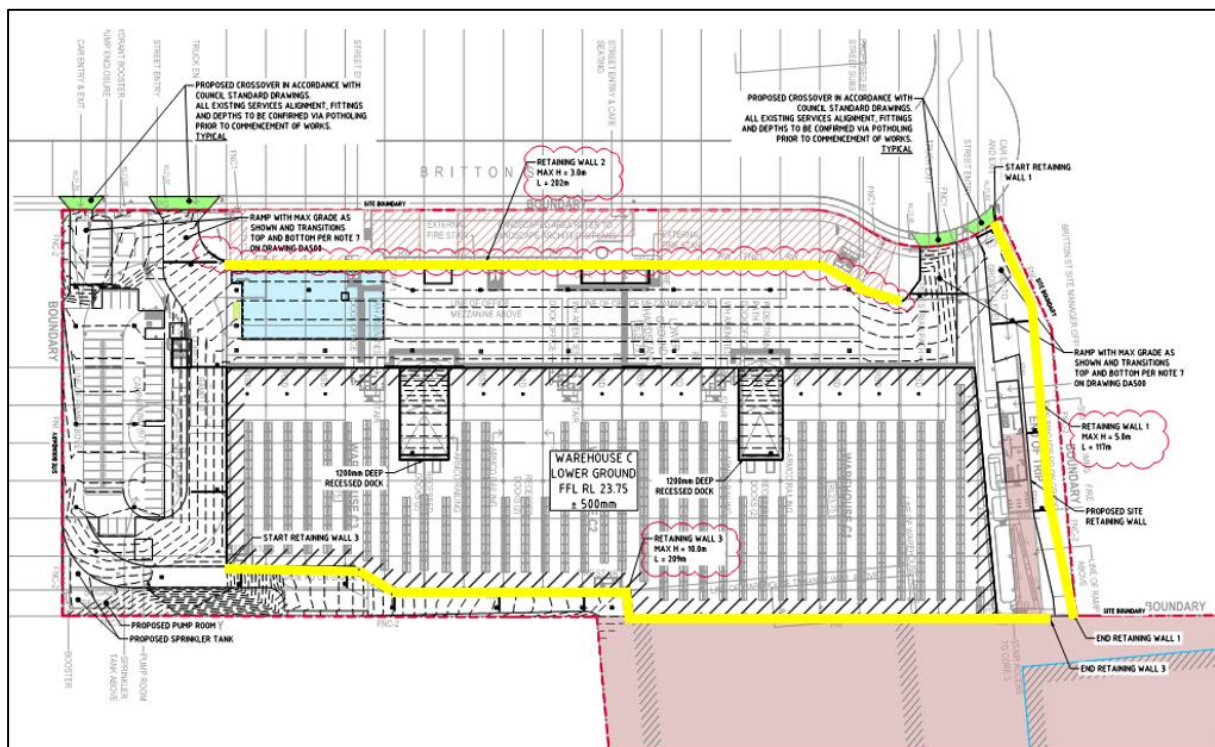


Figure 15. Location of Retaining Walls (Britton Street) (Source: Costin Roe, 2024)

3.5 SITE SERVICING AND UTILITIES

An assessment has been undertaken to determine the capacity for the subject site to be serviced by relevant infrastructure and utilities. The Infrastructure, Delivery, Management and Staging Plan (**Appendix 18**) identifies the existing services and infrastructure within the vicinity of the subject site and the proposed augmentation connection required to service the proposal. All relevant utility and service providers and authorities have confirmed that the subject site can be serviced, and no off-site infrastructure upgrades are required. Existing infrastructure services located on the subject site are identified in the civil engineering drawings attached as **Appendix 17**.

Utilities connections are detailed below.

3.5.1 Electricity

Substantial electrical reticulation exists in Britton Street and Percival Road, including high voltage overhead and underground electrical systems. Ten existing padmount substations are located within the subject site with a combined capacity of approximately 10MVa. Due to the location of the proposed building footprints, a number of these padmount substations will be decommissioned and removed from the subject site. New padmount substations will be installed within the subject site and appropriately located due to the proposed development.

Estimated demand for the proposed development is assessed at 2.7MVa. Endeavour Energy has confirmed that capacity exists to service the proposed development.

3.5.2 Telecommunications

The existing buildings on the subject site are serviced by fibre optic cable systems. During demolition these cables will be terminated, and new cables will be installed from the existing reticulation system to service the proposed development.

The proposed development can be adequately serviced by the surrounding fibre optic system.

3.5.3 Potable Water Supply

The current warehouse located on Britton Street is a manufacturing facility (Snack Brands Pty Ltd) and utilises a significant amount of water in its manufacturing processes. Reviewing the Sydney Water information from this property, average daily water use (over the period September 2023 to April 2024) was 591kl/day. The potable water demand for the proposed development is estimated at 44kl/day which is significantly less.

There is an existing 150mm water main laid on the eastern side of Britton Street which services the subject site. Sydney Water has confirmed that adequate service is available from this water main to service the proposed development and there is reasonable flow and adequate pressure.

3.5.4 Sewer

Review of Sydney Water records indicate that current discharge from the existing development averages 604kl/day, due to the operations of the Snack Brands facility which utilises a large potable water demand and associated wastewater discharges. Therefore, performance of the wastewater system will not be affected by the proposed development as the estimated discharge of wastewater is 38.3kl/day (a reduction of 566kl/day).

Sydney Water note that the existing network (i.e., the existing 225mm sewer within the site and downstream infrastructure) has capacity for Average Dry Weather Flow (ADWF) from the proposed development.

3.5.5 Gas

The subject site is adequately serviced by an existing 1,050kPa high pressure gas reticulation laid in Britton Street and Percival Road. Currently both of the existing properties are connected to these gas mains. However, due to the intended use of the proposed development as a warehouse and distribution centre, it is unlikely that gas reticulation would be required to service the proposed development.

3.6 BUILT FORM

3.6.1 Overview

The proposed development consists of three (3) warehouse buildings, with frontage to both Britton Street and Percival Road. Warehouse A and B will be located on Lot 34 DP 617521 (Percival Road frontage) at an RL of 33.75. Each building will be two-storey, with a maximum height of 28.6m from FFL (including roof plant).

Warehouse C will be located on Lot 1 DP 597082 (Britton Street frontage) at an RL of 23.75. Warehouse C accommodates an additional storey at lower ground level, due to the 10m difference in proposed site levels. Whilst this building height is 38.6m from FFL (including roof plant), the height of all three (3) buildings is consistent at RL 62.35. The three (3) warehouses will be connected at ground level and level 1 via a hardstand that allows for vehicle circulation across the whole site.

Each building will involve individual warehouse units, with ancillary office at mezzanine level. On the first floor, each building will have access to a shared outdoor amenity area. A café will be located within Warehouse C to accommodate the needs of employees.

The GFA for each building is outlined in **TABLE 10**. Perspectives of the proposed development are shown in **Figure 16** and **Figure 17** below.

TABLE 10: GROSS FLOOR AREAS				
Building No.	Tenancy number	Warehouse GFA	Office GFA	Total GFA
Building A	A1	7,287m ²	497m ²	7,784m ²
	A2	7,361m ²	500m ²	7,861m ²
	A3	3,719m ²	400m ²	4,119m ²
	A4	3,729m ²	250m ²	3,979m ²
	A5	3,758m ²	250m ²	4,008m ²
	A6	3,776m ²	400m ²	4,176m ²
	Shared amenities			132m ²
Building B	B1	7,812m ²	500m ²	8,312m ²
	B2	7,063m ²	500m ²	7,563m ²
	B3	4,302m ²	400m ²	4,702m ²
	B4	3,699m ²	250m ²	3,949m ²
	B5	3,672m ²	250m ²	3,922m ²
	B6	3,574m ²	400m ²	3,974m ²
	Shared amenities			133m ²
Building C	End of trip facilities (Percival Road)			110m ²
	C1	6,018m ²	300m ²	6,318m ²
	C2	2,814m ²	250m ²	3,064m ²
	C3	2,590m ²	250m ²	2,840m ²
	C4	3,655m ²	300m ²	3,955m ²
	C5	2,766m ²	250m ²	3,016m ²
	C6	2,488m ²	250m ²	2,738m ²
	C7	3,654m ²	300m ²	3,954m ²
	C8	2,767m ²	250m ²	3,017m ²



ENVIRONMENTAL IMPACT STATEMENT

15 – 21 Britton Street, Smithfield
Lot 1 DP 597082 and Lot 34 DP 617521

SSD-67368956

	C9	2,472m ²	289m ²	2,761m ²
	Café			71m ²
	End of trip facilities (Britton Street)			110m ²
Total		88,976m²	7,036m²	96,568m²



ENVIRONMENTAL IMPACT STATEMENT

15 – 21 Britton Street, Smithfield
Lot 1 DP 597082 and Lot 34 DP 617521

SSD-67368956

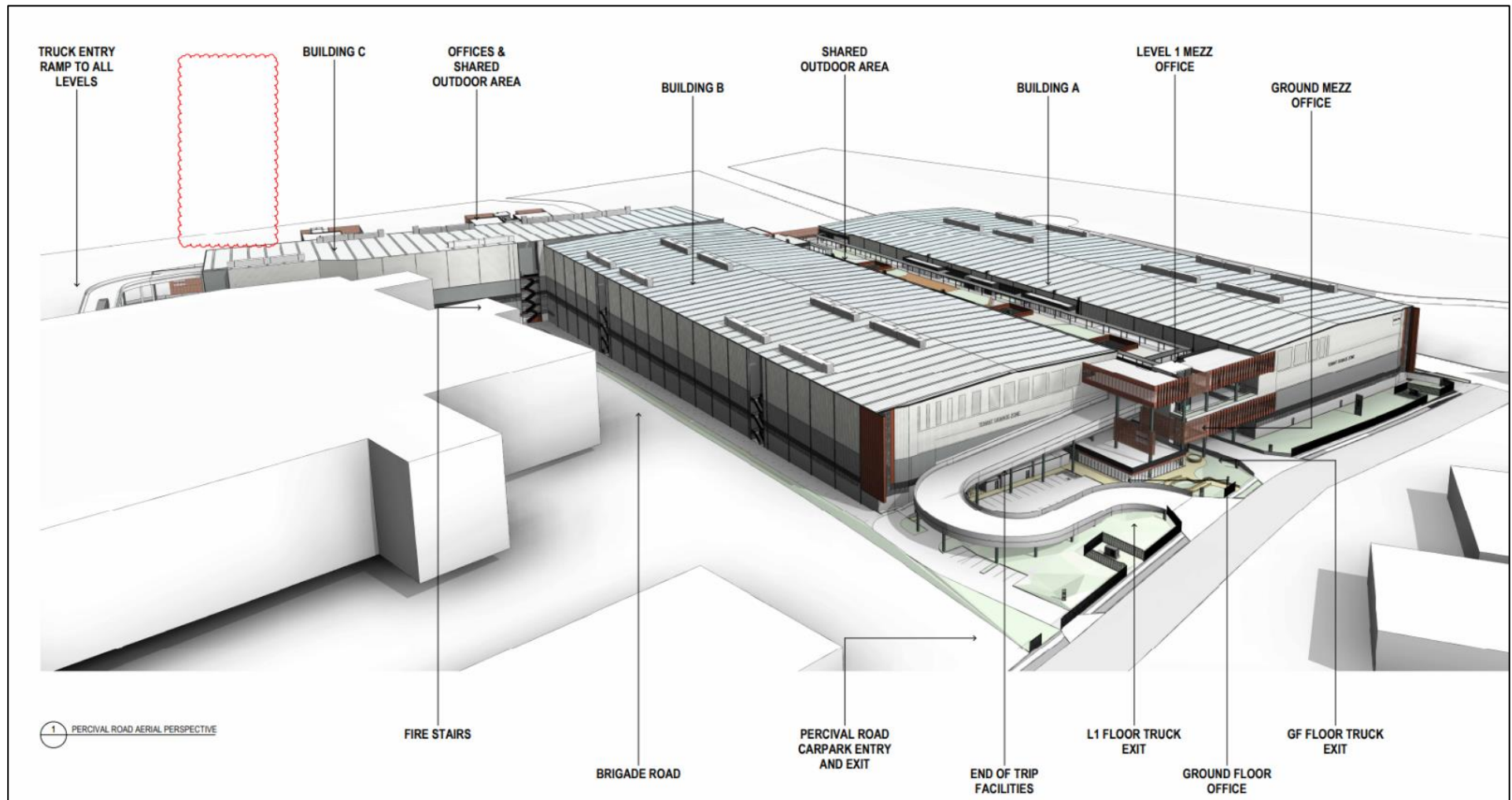


Figure 16. Percival Road Aerial Perspective (Source: SBA Architects, 2024)



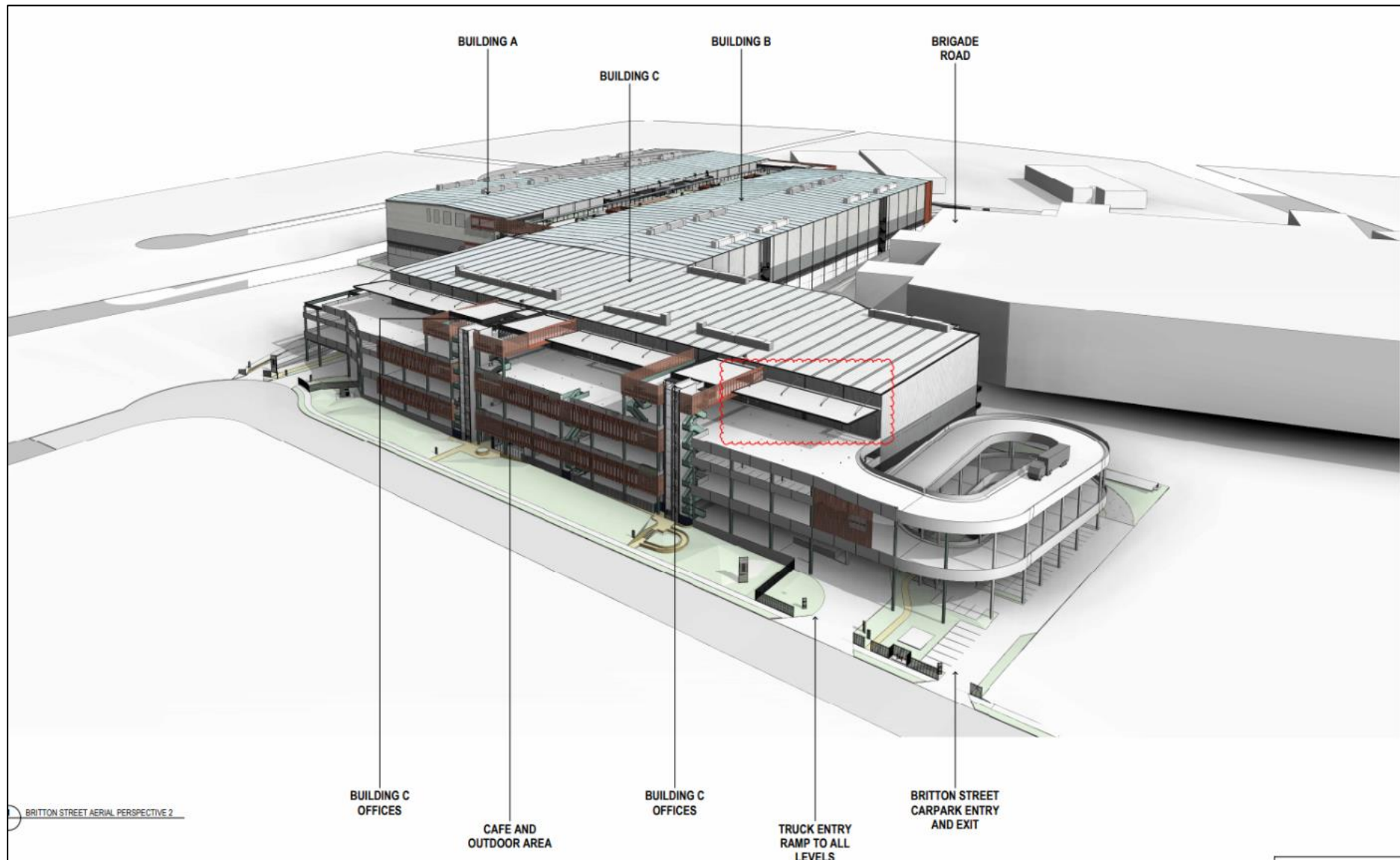


Figure 17. Britton Street Aerial Perspective (Source: SBA Architects, 2024)

3.6.2 Warehouse Tenancies

The building is designed to maximise site efficiency, with warehouse units located over three (3) levels. Offices and carparking are positioned on intermediate mezzanine levels to avoid disrupting warehouse and loading operations. The warehouses are connected via a hardstand, which provides access and reverse loading for heavy vehicles (refer **Section 3.8**).

In total, there are 21 versatile warehouse tenancies, ranging in size from 2,472m² to 7,812m². Each unit is capable of being combined with a neighbouring unit to create larger spaces, if required. This flexibility enables the building to accommodate both current and future market demands.

Natural lighting is provided to all warehouse spaces, with skylights illuminating the upper levels and continuous horizontal strip windows at the lower tenancies.

3.6.3 Office

Each warehouse unit has a corresponding office space, strategically located on mezzanine level. The office spaces range in size from 250m² to 500m².

Pedestrian access to office areas is provided via four (4) dedicated lifts and stairwells. These can be accessed via Britton Street and Percival Road at ground floor. Alternatively, vehicle access is provided via the shared carparking area on mezzanine level 1, which then provides pedestrian access to the dedicated lifts and stairwells.

A shared outdoor amenity area is provided for all employees within the breezeway, between Building A and B. This includes an outdoor gym space, seating areas, and landscaping. This is depicted in **Figure 18**.



Figure 18. Level 1 Mezzanine Amenity Area (Source: Geoscapes, 2024)

Full-height glazing is incorporated to optimise natural daylighting and enhance the activation of the street facades and the shared landscaped roof terrace. Daylight shading is implemented for north and south facing offices through orientation and covered walkways, with sun shading and high-performance glazing utilised for the street frontages (east and west).

3.6.4 Café

The café is conveniently positioned at street level, central to Britton Street frontage, serving both building occupants and the wider community. A total area of 71m² is provided for this space.

3.6.5 End of Trip Facilities

One (1) End of Trip (EOT) facility is located at the Britton Street frontage, which includes eight (8) showers, changing rooms and bicycle storage. The second EOT facility is provided at Percival Road frontage, which also includes eight (8) showers, changing rooms and bicycle storage.

3.6.6 Materials and Finishes

The proposed design incorporates a range of materials and finishes, including:

- Metal cladding, comprising a range of colours (refer **Figure 19**);
- Balustrades / columns with a paint finish of powder coated pale green;
- Steel with a paint finish of pale blue;
- Perforated mesh screening;
- Precast concrete panels; and
- Tinted glazing.

A 3D render showing the range of materials and colours for the building is depicted in **Figure 20**.

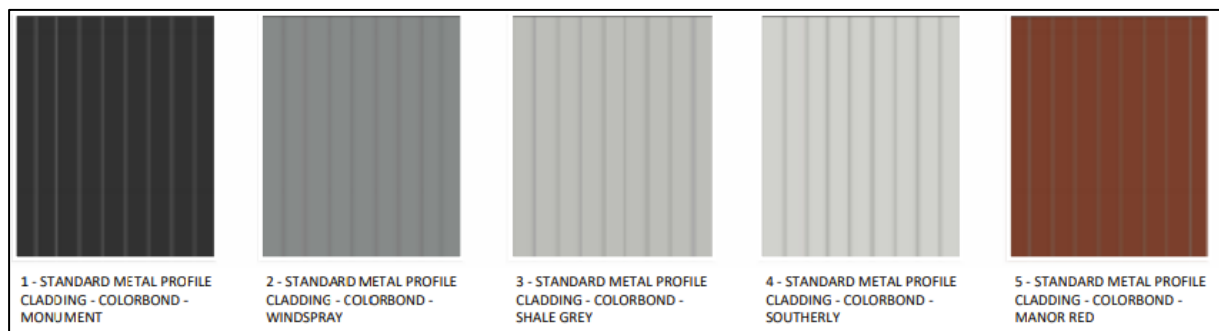


Figure 19. Metal Cladding Colours (Source: SBA Architects, 2024)



Figure 20. Britton Street 3D Renders Close Up (Source: SBA Architects, 2024)

3.6.7 Signage

TABLE 11 provides a summary of the signage proposed as part of the development. Approximate locations, dimensions and signage type have been included. Colours, text, artwork and logos will be confirmed once tenants are known. Further detail is provided within the Architectural Drawings attached as **Appendix 4**.

TABLE 11: SIGNAGE DETAILS				
Architectural Drawing Reference	Sign Type	Dimensions (width x height)	Number	Description
Signage 1.2	Wall mounted and illuminated business identification	13.14m x 5.77m	1	Located at Percival Road frontage
Signage 1.1	Wall mounted and illuminated business identification	15m x 9.36m	1	Located at Britton Street frontage
Signage 1.3	Freestanding / double sided signage	2m x 6m	3	3 x located at Britton Street frontage and 1 x located at Percival Road frontage. To include tenant names
Signage 1.4	Wall mounted business identification	3.5m x 9m	2	To include tenant names
Signage 2.1	Wall mounted business identification	1.55 x 1.2m	3	2 x located at Britton Street and 1 x located at Percival Road. To include tenant names and location information within the building
Signage 2.2	Wall mounted business identification	1.55m x 0.4m	1	Located at Britton Street frontage. To include. To include tenant names and location information within the building
Signage 2.3	Wall mounted business identification	1.50m x 0.25m	20	Located adjacent to lift/stairwells to identify location of each tenant
Signage 3.1	Wall mounted business identification	0.75m x 1.2m	17	Loading dock identification to be located adjacent to the roller shutter doors at warehouse units
Signage 3.2	Freestanding directional signage	0.85m x 2.2m	10	Located at vehicle entrance / exit points
Signage 3.3	Freestanding directional signage	0.6m x 1.8m	5	Located at pedestrian entrance points

All proposed signs are located within the boundaries of the subject site. Signage will be considered on an estate-wide basis, such that there will be consistency in materials and finishes of the signs across



the estate. Signage will be a combination of building mounted signs, and estate and tenant identification signs in landscape setbacks, at driveway entries and building entrances.

The signage design will be considered as part of the landscape and architectural language of the buildings, to provide placemaking and wayfinding principles for safety and user experience throughout the estate.

3.7 LANDSCAPE DESIGN

In line with the NSW Government Architect's *Greener Places Framework*, the proposed development has been designed to be a high performing, multi-functional landscape which seeks to maintain existing landscape features (where possible). Through its design considerations the proposal has managed to retain approximately 25% of the existing trees on the subject site.

The proposed landscape design includes a 15m landscape strip along both Britton Street and Percival Road frontages. The landscape strip includes large canopy cover trees, capable of growing between 15m – 20m and is under planted with layered hedging and native grasses. Landscape strips are also proposed along the northern and southern boundaries, incorporating a mix of trees, hedging, native shrubs and ground covers.

The resulting landscape characteristics of the proposed development include:

- A landscaped area of 13,428m², representing 15.31% site coverage;
- A total of 215 new trees and 12 tree ferns to be planted;
- A total of 28 trees to be incorporated into the outdoor amenity area; and
- A total canopy cover of 7,898m², representing 9% site coverage.

The Landscape Plans are attached as **Appendix 11** and depicted in **Figure 21** below. **Figure 22** includes a section showing the landscape strip adjacent to Britton Street.

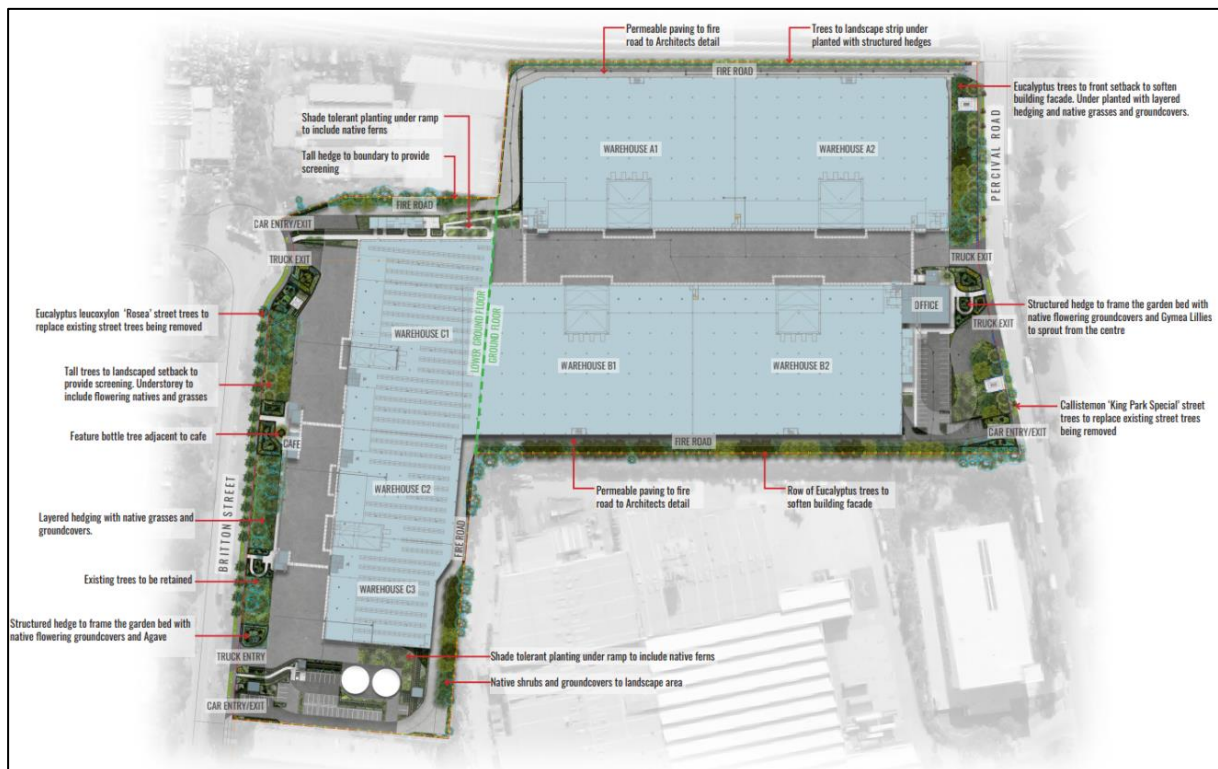


Figure 21. Proposed Landscape Design (Source: Geoscapes, 2024)

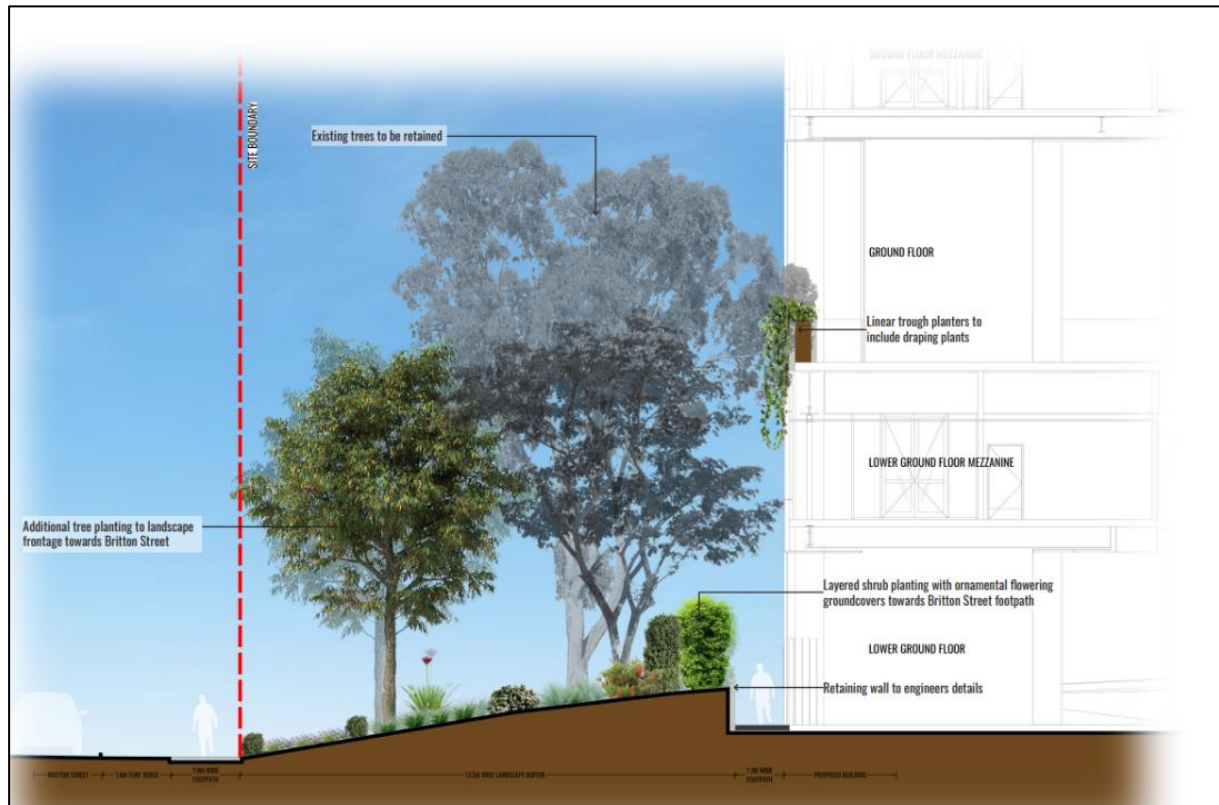


Figure 22. Britton Street Section (Source: Geoscapes, 2024)

3.8 TRANSPORT, PARKING AND ACCESS

3.8.1 Vehicle Access and Loading

Vehicle access is provided separately for heavy vehicles and light vehicles. The proposal involves the following vehicle crossings to be constructed:

Britton Street

- One (1) heavy vehicle crossing for entry via lower ground level;
- One (1) heavy vehicle crossing for exit via lower ground level;
- One (1) vehicle crossing for entry and exit to an at grade car park, as well as the southern emergency vehicle access road; and
- One (1) vehicle crossing for entry and exit to the mezzanine car park, as well as the northern emergency vehicle access road.

Percival Road

- One (1) heavy vehicle crossing for exit from ground level;
- One (1) heavy vehicle crossing for exit via a ramp from level 1;
- One (1) vehicle crossing for entry and exit to the northern emergency vehicle access road; and
- One (1) vehicle crossing for entry and exit to an at grade car park, as well as the southern emergency vehicle access road.

Loading, servicing and waste vehicles would access the subject site from Britton Street via the lower ground floor. From Britton Street, trucks would access the lower ground loading dock (units C1 – C3) or use the ramp to access the ground and level 1 loading docks (units A1 – A6, B1 – B6, and C4 – C6). Heavy vehicles would exit the lower ground loading dock via Britton Street, or exit via Percival Road at ground level or level 1.



Each loading dock would provide internal loading bays within each tenancy. HRVs and AVs would reverse park in internal loading bays and recessed docks. Waste collection would occur at internal loading bays / recessed docks.

External loading zones would also be available for occasional use by larger vehicles and would be shared between tenancies. Larger vehicles such as B-doubles would park in the external loading zones and side-load. The external loading zones would be managed by individual dock offices at each tenancy.

In addition to the loading bays and areas, additional space is also provided for vehicles to wait or park. Therefore, if required, it is anticipated that heavy vehicles would queue within the subject site and not on the external road network.

Parking, loading and access arrangements have been designed to comply with *AS/NZS 2890.1 (2004)*, *AS/NZS 2890.2 (2018)* and *AS/NZS 2890.6 (2022)*. Swept path analysis is provided within the TAIA at **Appendix 10**.

3.8.2 On-site Parking

Three (3) carparking areas are provided on the subject site for visitors and employees, including:

- At grade carpark which is accessible via the southern end of Britton Street;
- Mezzanine level carpark, which is accessible via a ramp from Britton Street. This is the primary carpark for employees; and
- At grade carpark, which is accessible via the southern end of Percival Road. This is a secondary carpark for employees and visitors.

A total of 482 carparking spaces are provided across the three (3) carparks, including seven (7) accessible spaces. Nine (9) motorbike spaces are also provided in this area.

80 bicycle parking spaces are provided within the EOT facilities.

3.9 STORMWATER MANAGEMENT

As per general engineering practice and the guidelines of Council, the proposed stormwater drainage system for the development will comprise a minor and major system to safely and efficiently convey collected stormwater run-off from the development to the legal point of discharge. The drainage system can be summarised as follows:

- In ground drainage system designed to the 5% Annual Exceedance Probability (AEP) (1 in 20 year ARI (Annual Recurrence Interval));
- An OSD (On-Site Detention) tank sized according to Council requirements;
- Treatment of stormwater of a portion of surface and roof water via two combined OSD systems and Water Quality tanks, with Ocean Protect StormFilter cartridges;
- Treatment of stormwater via a proprietary filtration systems; and
- Site discharge via the existing pit located in Britton Street and existing manhole located to the north of the Percival Road lot.

Further detail is provided in **Section 6.1.13** and **Appendix 17** of this EIS.



3.10 CONSTRUCTION DETAILS

3.10.1 Overview

Construction of the development will not be staged, but will be carried out in three (3) phases consisting of:

- Site preparation involving demolition, remediation (if required), earthworks and infrastructure;
- Warehouse construction and fit-out; and
- Site demobilisation, post-construction site rehabilitation, landscaping and finishing works.

Construction is anticipated to commence Quarter 3 of 2025 (subject to development approval) and would involve up to a 24-month construction programme. This will include bulk earthworks, provision of services and building construction.

3.10.2 Construction Management

A detailed Construction Environmental Management Plan (CEMP) will be prepared by the appointed contractor prior to the commencement of construction.

In terms of traffic management during construction, potential construction traffic management measures have been identified by the preliminary Construction Traffic Management Plan (CTMP) that has been included in the TAIA (**Appendix 10**).

All necessary access arrangements will be in place for construction vehicles as they enter and exit the site. A detailed CTMP will establish site access arrangements during the construction phase. The CTMP will comply with the relevant standards and guidelines that relate to construction traffic management.



PART 4 STATUTORY CONTEXT

4.1 CONTROLS AND POLICIES OVERVIEW

This part of the EIS aims to highlight and address the relevant statutory requirements that are related to the proposed development, as noted below.

Commonwealth Planning Context

- *Commonwealth Environment Protection and Biodiversity Conservation Act 1999*

State Planning Context

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2021*
- *Water Management Act 2000*
- *Biodiversity Conservation Act 2016*
- *State Environmental Planning Policy (Planning Systems) 2021*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *State Environmental Planning Policy (Industry and Employment) 2021*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021*
- *State Environmental Planning Policy (Sustainable Buildings) 2022*

Local Planning Context

- *Cumberland Local Environmental Plan 2021*
- *Cumberland Development Control Plan 2021*

This proposal has been carefully assessed against the requirements and objectives of all of the above planning statutory and policy documents, as detailed within this EIS. An assessment against the legislation is provided within **Appendix C** of this EIS.

In accordance with Clause 2.10 of the Planning Systems SEPP, development control plans do not apply to SSD. Nonetheless, an assessment against the key controls of CDCP 2021 relating to the E4 zone is provided at **Appendix 29**.

4.1.1 Commonwealth Planning Context

Under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), any action (which includes a development, project or activity) that is considered likely to have a significant impact on Matters of National Environmental Significance (MNES) (including nationally threatened ecological communities and species and listed migratory species), must be referred to the Commonwealth Minister for the Environment. The purpose of the referral is to allow a decision to be made about whether an action requires approval on a Commonwealth level. If an action is considered likely to have significant impact on MNES, it is declared a “Controlled Action” for which formal Commonwealth approval is required.

Écologique has confirmed that the proposal would not have significant impacts on MNES and therefore referral to the Commonwealth Minister is not required. See **Section 6.1.9** of this EIS.

4.1.2 Statutory Requirements

The following categories are used to identify the statutory requirements of the project.



TABLE 12: STATUTORY REQUIREMENTS OVERVIEW

Power to grant approval	In accordance with Schedule 1 of the Planning Systems SEPP, development that has an EDC of more than \$50 million for the purpose of a warehouse or distribution centre, constitutes SSD. As noted in Section 1.5 of the EIS, the EDC of the proposed development is in excess of \$50 million. The power to grant approval lies with the Minister for Planning (DPHI) as the consent authority for SSD, pursuant to Section 4.5 of the EP&A Act.
Permissibility	The subject site is located within the E4 zone, under the CLEP 2021. The proposed development aligns with the definition of 'warehouse or distribution centre', which is permitted with consent in the E4 zone. Ancillary activities are also proposed including a 'food and drink premise'. This is also permitted with consent in the E4 zone. Pursuant to the <i>Standard Instrument – Principal Local Environmental Plan</i>, the following definitions are relevant: ▪ warehouse or distribution centre means a building or place used mainly or exclusively for storing or handling items (whether goods or materials) pending their sale, but from which no retail sales are made, but does not include local distribution premises. ▪ food and drink premises means premises that are used for the preparation and retail sale of food or drink (or both) for immediate consumption on or off the premises, and includes any of the following— (a) a restaurant or cafe, (b) take away food and drink premises, (c) a pub, (d) a small bar.
Other approvals	▪ Consistent approvals: N/A ▪ Other approvals: Post approval, there will be a Section 138 Roads Act Approval for the vehicle cross-over works within the Percival Road and Britton Street road reserves.
Pre-condition to exercising power to grant approval	Pre-conditions to exercising the power to grant approval are outlined in TABLE 13 below.
Mandatory matters for consideration	Mandatory matters of consideration by the consent authority are outlined in Appendix C of this EIS.

4.1.3 Pre-conditions

TABLE 13 outlines the pre-conditions to exercising the power to grant approval which are relevant to the project and the section where these matters are addressed within the EIS.

TABLE 13: PRE-CONDITIONS OVERVIEW

Statutory Reference	Pre-condition	Relevance	Addressed in EIS
State Environmental Planning Policy	Remediation of land: The consent authority must not grant consent unless (as stipulated	A DSI and RAP have been prepared for the subject site. Subject to	Refer to Section 6.1.16 ,

TABLE 13: PRE-CONDITIONS OVERVIEW

Statutory Reference	Pre-condition	Relevance	Addressed in EIS
(Resilience and Hazards) 2021 (Resilience and Hazards SEPP)	by Clause 4.6 of the Resilience and Hazards SEPP: (a) <i>it has considered whether the land is contaminated, and</i> (b) <i>if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and</i> (c) <i>if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.</i>	the suitable implementation of the measures described in the RAP, it is concluded that the site will be or can be made suitable for the development and that the risks to the environment can be appropriately protected during the works.	Appendix 20 and Appendix 21 of this EIS.
State Environmental Planning Policy (Industry and Employment) 2021 (Industry and Employment SEPP)	Signage: The consent authority must not grant consent to an application to display signage (as stipulated by Clause 3.6 of the Industry and Employment SEPP), unless the consent authority is satisfied: (a) <i>that the signage is consistent with the objectives of this Chapter as set out in section 3.1(1)(a), and</i> (b) <i>that the signage the subject of the application satisfies the assessment criteria specified in Schedule 5.</i>	The proposed development involves the provision of signage, requiring consideration of the Industry and Employment SEPP.	Refer to Section 6.1.4 and Appendix 31 of this EIS.
State Environmental Planning Policy (Transport and Infrastructure) 2021 (Transport and Infrastructure SEPP)	Development likely to affect an electricity transmission or distribution network: Pursuant to Clause 2.48 of the Transport and Infrastructure SEPP, before determining the application, the consent authority must: (a) <i>give written notice to the electricity supply authority for the area in which the development is to be carried out, inviting comments about potential safety risks, and</i>	The proposal involves work within or immediately adjacent to easements for electricity infrastructure. The proposal also involves new vehicle crossings and removal of trees underneath exposed overhead electricity power lines. It is acknowledged that the consent authority must provide notice to the electricity supply authority and	Refer to Appendix 18 of this EIS.



TABLE 13: PRE-CONDITIONS OVERVIEW

Statutory Reference	Pre-condition	Relevance	Addressed in EIS
	(b) take into consideration any response to the notice that is received within 21 days after the notice is given.	incorporate any feedback received. Preliminary engagement has been undertaken with Endeavour Energy in relation to the proposed works and is ongoing.	
	Traffic-generating development: Pursuant to Clause 2.122 of the Transport and Infrastructure SEPP, before determining an application, the consent authority must: (a) give written notice of the application to TfNSW within 7 days after the application is made, and (b) take into consideration- (i) any submission that RMS provides in response to that notice within 21 days after the notice was given (unless, before the 21 days have passed, TfNSW advises that it will not be making a submission), and (ii) the accessibility of the site concerned, including— (A) the efficiency of movement of people and freight to and from the site and the extent of multi-purpose trips, and (B) the potential to minimise the need for travel by car and to maximise movement of freight in containers or bulk freight by rail, and (iii) any potential traffic safety, road congestion or parking implications of the development.	The proposed development involves a warehouse and distribution centre with a site area greater than 8,000m², which constitutes traffic-generating development, as described in Schedule 3 of the Transport and Infrastructure SEPP. It is acknowledged that the consent authority must provide notice to TfNSW and incorporate any feedback received. Preliminary engagement with TfNSW has been undertaken, including a review of the draft TAIA.	Refer to Section 6.1.6 and Appendix 10 of the EIS.
State Environmental Planning Policy (Biodiversity and	Council permits for clearing of vegetation in non-rural areas:	Tree removal is proposed as part of this application which requires consideration	Refer to Section 6.1.9 and



TABLE 13: PRE-CONDITIONS OVERVIEW

Statutory Reference	Pre-condition	Relevance	Addressed in EIS
Conservation) 2021 (<i>Biodiversity and Conservation SEPP</i>)	Pursuant to Clause 2.10(2) of the Biodiversity and Conservation SEPP, a permit cannot be granted to clear native vegetation in any non-rural area of the State that exceeds the biodiversity offsets scheme threshold.	of Clause 2.10(2). The BDAR confirms that the biodiversity offsets scheme threshold will not be exceeded.	Appendix 13 of this EIS.
State Environmental Planning Policy (Sustainable Buildings) 2022 (<i>Sustainable Buildings SEPP</i>)	Non-residential development: Pursuant to Clause 3.2(1) of the Sustainable Buildings SEPP, in deciding whether to grant development consent, the consent authority must consider whether the development is designed to enable the following: (a) <i>the minimisation of waste from associated demolition and construction, including by the choice and reuse of building materials,</i> (b) <i>a reduction in peak demand for electricity, including through the use of energy efficient technology,</i> (c) <i>a reduction in the reliance on artificial lighting and mechanical heating and cooling through passive design,</i> (d) <i>the generation and storage of renewable energy,</i> (e) <i>the metering and monitoring of energy consumption,</i> (f) <i>the minimisation of the consumption of potable water.</i>	Non-residential development is proposed which requires consideration of Clause 3.2(1) of the Sustainable Buildings SEPP.	Refer to Section 6.1.8 and Appendix 12 of this EIS.
	Non-residential development: Pursuant to Clause 3.2(2) of the Sustainable Buildings SEPP, development consent must not be granted to non-residential development unless the consent authority is satisfied the embodied emissions attributable to the development have been quantified.	Non-residential development is proposed, which therefore requires consideration of Clause 3.2(2) of the Sustainable Buildings SEPP. The embodied emissions attributable to the development have been quantified.	Refer to Appendix 31 of this EIS.
	Non-residential development: 	Large commercial development is proposed, which therefore requires consideration of Clause 3.3(1) of the Sustainable Buildings SEPP. A Net	Refer to Appendix 32 of this EIS.



TABLE 13: PRE-CONDITIONS OVERVIEW

Statutory Reference	Pre-condition	Relevance	Addressed in EIS
	Pursuant to Clause 3.3(1) of the Sustainable Buildings SEPP, in deciding whether to grant development consent to large commercial development, the consent authority must consider whether the development minimises the use of on-site fossil fuels, as part of the goal of achieving net zero emissions in New South Wales by 2050.	Zero Statement has been prepared by Cundall for the proposed works.	
	Non-residential development: Pursuant to Clause 3.3(2) of the Sustainable Buildings SEPP, development consent must not be granted to large commercial development unless the consent authority is satisfied the development is capable of achieving the standards for energy and water use specified in Schedule 3. For the purposes of subsection (2), development is capable of achieving a standard specified in Schedule 3 if there is a NABERS commitment agreement in place to achieve the standard.	Large commercial development is proposed, which therefore requires consideration of Clause 3.3(2) of the Sustainable Buildings SEPP. NABERS agreements have been prepared for the proposed works.	Refer to Appendix 33 of this EIS.
Cumberland Local Environmental Plan 2021 (CLEP 2021)	Flood Planning: Pursuant to Clause 5.21, development consent must not be granted unless the consent authority is satisfied the development: (a) <i>is compatible with the flood function and behaviour on the land, and</i> (b) <i>will not adversely affect flood behaviour in a way that results in detrimental increases in the potential flood affectation of other development or properties, and</i> (c) <i>will not adversely affect the safe occupation and efficient evacuation of people or exceed the capacity of existing evacuation routes for the surrounding area in the event of a flood, and</i>	The subject site is located within a flood planning area which requires consideration of Clause 5.21 of the CLEP 2021.	Refer to Section 6.1.14 and Appendix 17 of this EIS.



TABLE 13: PRE-CONDITIONS OVERVIEW

Statutory Reference	Pre-condition	Relevance	Addressed in EIS
	(d) <i>incorporates appropriate measures to manage risk to life in the event of a flood, and</i> (e) <i>will not adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses.</i> In deciding whether to grant development consent, the consent authority must consider: (a) <i>the impact of the development on projected changes to flood behaviour as a result of climate change,</i> (b) <i>the intended design and scale of buildings resulting from the development,</i> (c) <i>whether the development incorporates measures to minimise the risk to life and ensure the safe evacuation of people in the event of a flood,</i> (d) <i>the potential to modify, relocate or remove buildings resulting from development if the surrounding area is impacted by flooding or coastal erosion.</i>		
	Earthworks: Pursuant to Clause 6.2, in deciding whether to grant development consent for earthworks, the consent authority must consider: (a) <i>the likely disruption of, or the detrimental effect on, drainage patterns and soil stability in the locality of the development,</i> (b) <i>the effect of the development on the likely future use or redevelopment of the land,</i> (c) <i>the quality of the fill and the soil to be excavated,</i> (d) <i>the effect of the development on the existing and likely amenity of adjoining properties,</i>	The proposal involves earthworks which requires consideration of Clause 6.2 of the CLEP 2021.	Refer to Section 6.1.12 and Appendix 17 of this EIS.



TABLE 13: PRE-CONDITIONS OVERVIEW

Statutory Reference	Pre-condition	Relevance	Addressed in EIS
	(e) <i>the source of the fill material and the destination of the excavated material,</i> (f) <i>the likelihood of disturbing relics,</i> (g) <i>the proximity to, and potential for adverse impacts on, a waterway, drinking water catchment or environmentally sensitive area,</i> (h) <i>appropriate measures proposed to avoid, minimise or mitigate the impacts of the development.</i>		
	Biodiversity: Pursuant to Clause 6.5, in deciding whether to grant development consent for development, the consent authority must consider: (a) <i>whether the development is likely to have—</i> (i) <i>an adverse impact on the condition, ecological value and significance of the fauna and flora on the land, and</i> (ii) <i>an adverse impact on the importance of the vegetation on the land to the habitat and survival of native fauna, and</i> (iii) <i>the potential to fragment, disturb or diminish the biodiversity structure, function and composition of the land, and</i> (iv) <i>an adverse impact on the habitat elements providing connectivity on the land, and</i>	A small section of the subject site is identified as “remnant native vegetation” under the CLEP 2021. The majority of this vegetation was removed as part of a previous development consent. Nonetheless, a full assessment of biodiversity values has been undertaken for the proposal.	Refer to Section 6.1.9 and Appendix 13 of this EIS.
	Stormwater Management: Pursuant to Clause 6.7, development consent must not be granted unless the consent authority is satisfied that the development:	New stormwater infrastructure is proposed as part of this application, requiring consideration of Clause 6.7 of the CLEP 2021.	Refer to Section 6.1.13 , Section 6.1.14 and Appendix 17 of this EIS.



TABLE 13: PRE-CONDITIONS OVERVIEW

Statutory Reference	Pre-condition	Relevance	Addressed in EIS
	(a) <i>is designed to maximise the use of water permeable surfaces on the land having regard to the soil characteristics affecting on-site infiltration of water, and</i> (b) <i>includes, if practicable, on-site stormwater retention for use as an alternative supply to mains water, groundwater or river water, and</i> (c) <i>avoids significant adverse impacts of stormwater runoff on adjoining properties, native bushland and receiving waters, or if the impact cannot be reasonably avoided, minimises and mitigates the impact.</i>		
	Salinity: Pursuant to Clause 6.9, development consent must not be granted to development unless the consent authority has considered the following: (a) <i>whether the development is likely to have an adverse impact on salinity processes on the land,</i> (b) <i>whether salinity is likely to have an impact on the development,</i> (c) <i>appropriate measures proposed to avoid, minimise or mitigate the impacts of the development.</i> Development consent must not be granted to development unless the consent authority is satisfied that: (a) <i>the development is designed, sited and will be managed to avoid a significant adverse environmental impact, or</i> (b) <i>if a significant adverse environmental impact cannot be avoided—the development is designed, sited and will be managed to minimise the impact, or</i>	The subject site is identified as “potential moderate salinity land”. Testing undertaken as part of the Geotechnical Assessment show that “non-saline” and “slightly saline” soil conditions are present. The Geotechnical Assessment confirms that a Salinity Management Plan is not required for the proposal.	Refer to Section 6.1.12 and Appendix 16 of this EIS.



TABLE 13: PRE-CONDITIONS OVERVIEW

Statutory Reference	Pre-condition	Relevance	Addressed in EIS
	(c) <i>if a significant adverse environmental impact cannot be minimised—the development will be managed to mitigate the impact.</i>		
	Urban heat: Pursuant to Clause 6.12, in deciding whether to grant development consent for the purposes of commercial premises, industries or residential accommodation, the consent authority must consider whether- (a) <i>the facade and roof of the proposed building and paved surfaces are designed to reduce adverse effects of solar heat on the surrounding land, including private open space and the public domain, and</i> (b) <i>the awnings and eaves of the building are designed to provide shelter from the sun and improve public comfort at street level, and</i> (c) <i>the heating, ventilation and air conditioning systems of the building are designed to minimise the release of heat in the direction of private open space and the public domain, and</i> (d) <i>the development maximises the use of green infrastructure that is strategically designed and managed to support a good quality of life in an urban environment, and</i> (e) <i>the development accommodates sufficient tree canopy, open space and deep soil zones to achieve urban cooling benefits, and</i> (f) <i>the building is designed to achieve high passive thermal performance.</i>	A new industrial premise, including office, is proposed as part of this SSDA, requiring consideration of Clause 6.12 of the CLEP 2021.	Refer to Appendix 5 and Appendix 12 of this EIS.



PART 5 ENGAGEMENT

5.1 OVERVIEW

An application to receive Industry-specific SEARs was submitted to DPHI, with the SEARs (reference: SSD-67368956) subsequently issued on 13 February 2024. A copy of the issued SEARs is included in **Appendix 1**.

As required by item 25, project specific consultation was required with the following stakeholders:

- the relevant Department assessment team;
- the relevant local Councils;
- any relevant agencies;
- the community; and
- if the development would have required an approval or authorisation under another Act but for the application of s4.41 of the EP&A Act or requires an approval or authorisation under another Act to be applied consistently by s4.42 of the EP&A Act, the agency relevant to that approval or authorisation.

Further, the SEARs outlined additional consultation with Water NSW in relation to works adjacent to the pipeline to the north of the subject site and Endeavour Energy in relation to electricity infrastructure. It is noted that the Proponent engaged with Water NSW, however Water NSW advised that the pipeline is a Sydney Water asset. Therefore, engagement was subsequently undertaken with Sydney Water in this regard.

A comprehensive level of community and stakeholder engagement has been undertaken for the proposed development. This has included numerous meetings and notification letters to both agencies and all potentially-impacted stakeholders.

A comprehensive Engagement Report (located in **Appendix 28** of this EIS) has been prepared by HillPDA, in support of this SSD Application, and in line with the *NSW DPE's Undertaking Engagement Guidelines for State Significant Projects*. It committed to the delivery of a considered, open and evidence-based approach to the engagement. Some key components of the engagement plan are summarised below.

5.2 ENGAGEMENT CARRIED OUT

Community stakeholders were divided into two groups according to the level or type of impact from the proposed development.

- **Tier 1 stakeholders:** local community and potential sensitive receivers; and
- **Tier 2 stakeholders:** government agencies and peak organisations whose responsibilities are relevant to the proposed development.

The tiered engagement approach distributes stakeholders by the extent of potential impact that the proposal may have on them. This allows the engagement approach to be tailored to the scale of any potential impacts arising from the proposal and the likely level of interest among stakeholders. Details of tier one and two stakeholders are provided in the sections below. Consultation with stakeholders will also occur as the proposal progresses through the SSD assessment process, including during public exhibition.



5.2.1 Tier 1 Stakeholders

Letterbox drop

On 25 February 2024, a project information newsletter was distributed to 209 Tier 1 stakeholders to introduce the proposal to community members early in the process. The letterbox drop aimed to provide an accessible means for stakeholders to raise any issues or concerns prior to the SSDA submission. A link to an online survey was provided in the newsletter delivered to occupants of surrounding and adjacent properties.

As of 21 May 2024, no responses were received from the online survey. Additionally, there were no submissions through email or phone following the newsletter distribution. This lack of feedback suggests that the occupants of residential and non-residential premises near the subject site are not significantly concerned about the proposal.

Project webpage

An engagement website was launched via the HillPDA Engagement Portal, providing an overview of the proposed development and a link to an online survey. As of 21 May 2024, the website had received 31 total page views including 25 unique visitors. Of these, 19 users chose to register their details in order to receive future updates, indicating some level of interest in staying informed. No responses were received to the online survey.

Submissions inbox and project phone line

The project newsletter and project webpage contained a submissions phonenumber and email address for residents and workers to the surrounding area of the subject site to ask any questions or raise concerns. No concerns were raised by the surrounding community through the submissions email inbox or the phone line. The overall lack of responses or community engagement appears to indicate generally low interest in the project.

5.2.2 Tier 2 Stakeholders

The proponent has engaged the following stakeholders as part of the SSDA process. This has been through a mixture of meetings, emails/letters and phone calls.

- Heritage NSW
- DPHI
- TfNSW
- NSW Environment and Heritage
- Water NSW
- Sydney Water
- NSW Environment Protection Agency
- Natural Resource Access Regular
- Cumberland City Council
- Endeavour Energy
- NBNSCo.

Of the agencies and infrastructure providers consulted, none raised any objection to the proposed development. Infrastructure agencies that responded to HillPDA's request for input suggested that the proposal would be adequately serviced by existing infrastructure. The proponent has responded to feedback from agencies and this is reflected in the EIS documentation. Full details of the engagement is outlined in **Appendix D** and **Appendix 28** of this EIS.

5.3 ONGOING ENGAGEMENT

The Proponent is committed to ongoing community consultation following the submission of the



EIS.

In accordance with the EP&A Regulation, DPHI will exhibit the EIS on the Major Projects NSW website and invite submissions from both government agencies and the public. Once the exhibition period is complete, DPHI may require the Proponent to prepare a Response to Submissions Report addressing the issues raised. The Proponent will continue to liaise with DPHI and stakeholders during the assessment of this SSDA to address queries that may arise.



PART 6 ASSESSMENT OF IMPACTS

6.1 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

The SEARs (reference: SSD-67368956), issued by the NSW DPHI on 13 February 2024, identify the following matters to be addressed:

1. Statutory Context
2. Capital Investment Value and Employment
3. Design Quality
4. Built Form and Urban Design
5. Visual Impact
6. Traffic, Transport and Accessibility
7. Trees and Landscaping
8. Ecologically Sustainable Development (ESD)
9. Biodiversity
10. Air Quality
11. Noise and Vibration
12. Ground and Water Conditions
13. Water Management
14. Flooding Risk
15. Hazards and Risks
16. Contamination and Remediation
17. Waste Management
18. Aboriginal Cultural Heritage
19. Environmental Heritage
20. Social Impact
21. Infrastructure Requirements and Utilities
22. Bush Fire Risk
23. Construction, Operation and Staging
24. Contributions and Public Benefit
25. Engagement

The abovementioned matters, and other necessary matters, are addressed in the following sections.

6.1.1 Statutory Context

This section of the EIS evaluates the statutory and strategic context of the proposed development, in relation to the SEARs and addresses its specific matters.

In response to Item 1: Statutory Context of the SEARs, **TABLE 14** specifies the location of each assessment of the relevant statutory and strategic documents.

TABLE 14: STATUTORY CONTEXT REVIEW	
Document	Response / Location of Assessment
<i>Address all relevant legislation, environmental planning instruments (EPIs) (including drafts), plans, policies and guidelines.</i>	Refer to PART 4 of this EIS and Appendix C of this EIS.
<i>Identify compliance with applicable development standards and provide a detailed justification for any non-compliances.</i>	Refer to Appendix C of this EIS.
<i>Provide an explanation of how the development as described in the EIS is consistent with the development as was described in the request for</i>	The proposal includes the use and operation of a warehouse and distribution



TABLE 14: STATUTORY CONTEXT REVIEW

Document	Response / Location of Assessment
<i>SEARs (including any components that were not SSD) and provide a justification for any differences.</i>	centre as described in the request for SEARs. The proposal also includes a café as an ancillary activity to the main warehouse and distribution centre. This is ancillary to the development as it is provided to support the employees of the distribution operations (although will not be completely exclusive to those employees). Given the surrounding industrial context, there are limited options for food and drink premises. The development is large-scale, catering for up to 1,025 employees. It is considered that the café is sufficiently related to the state significant development.
<i>Address the requirements of any approvals applying to the site, including any concept approval or recommendation from any Gateway determination.</i>	Refer to Section 2.3 of this EIS.

6.1.2 Capital Investment Value and Employment

Item 2 of the SEARs requires details regarding the Capital Investment Value and employment in relation to the proposed development. Since the SEARs were received, DPHI has amended the definition of Capital Investment Value, which is now replaced by Estimated Development Cost. RLB has prepared an EDC Report for the proposal, which is attached as **Appendix 2**. A summary of the EDC and employment details is provided in **Section 1.5** and **Section 1.6** of this EIS.

6.1.3 Design Quality

6.1.3.1 Existing Environment

The proposed development achieves good design in accordance with the seven (7) objectives for good design in *Better Placed*, as addressed below and documented in SBA Architects' Design Report, attached as **Appendix 5**. This is summarised below.

1. Better Fit

In the initial design stages, careful consideration was given to the evolving future character and environment of the area. The focus was on establishing a strong connection to the public realm within the existing industrial context.

The street facing elevations have been expressed to reflect the operational qualities of the warehouse, while also introducing unique character through architecturally curated features and office designs. Office zones are distributed along the sides of the warehouses and hardstands to maximise outlook and site usage.

Contrasting colours such as Monument, Greys, Coppers & Pale Greens, along with vegetation and landscaping are integrated into the building facades.



2. Better Performance

Sustainability has driven the design of the building. Large areas on the roof are dedicated for solar arrays in addition to glazing and translucent panels to bring natural light into every warehouse.

Every unit would receive ample amount of natural sunlight. The north facing office facades are shaded by covered walkways, while the east and west facing facades incorporate shading devices and high-performance glazing that helps mitigate solar heat gain, while providing natural light to the office spaces.

Two end of trip facilities have been provided to promote the use of bicycle transportation.

3. Better for Community

The development presents businesses with an opportunity to utilise the multi-tenanted facility, replacing the current single tenancy buildings and introducing potential for growth and community diversification. Shared outdoor spaces are accessible to all tenancies with elevators fostering an inclusive and accessible environment.

4. Better for People

The design puts a particular emphasis on creating a safe and effective path of travel for the occupants as well as vehicular traffic, by keeping car and truck accessways separate.

Truck movement has been designed with an efficient single direction flow with minimal crossover of pedestrian movement to further add safety on site. Pedestrian footpaths and bicycle access at lower ground and ground floor levels are separated from vehicular traffic.

All offices have access to outdoor areas with break out areas as well as gathering spaces and a gym.

5. Better Working

The effect on the environment has been considered by designing the ramps above the minimum pitches per code to allow for less stress on trucks. This would result in less noise pollution, thereby enhancing the environment for the occupants and surroundings. Within the hardstand, column sizes are designed to be spaced wider than the warehouse's grid to allow for maximum clearances for truck movement and loading.

Offices are positioned in opportune locations to utilise various ends of the facility and not be too congested, whilst maintaining direct and clear links to the carpark and warehouses.

6. Better Value

The facility is designed to serve as a unified and succinct warehouse facility, subdivided into three main buildings while utilising the whole site more efficiently. The design for the mezzanine carparking deck with lobby access to each tenancy, further provides an efficient use of the subject site, which results in more outdoor amenity and landscaped areas.

The proposed development has the potential for up to 21 tenancies, which, along with the café, would add more activity and occupants to the area.

Considerate exploration into the building materials and overall composition has been made to design a unique and harmonious facility.



7. Better Look and Feel

The bulk of warehouse mass is carefully attended to with simple planes, blocks, materials, and patterning. This approach enables the treatment of the offices to stand out and extend across the warehouse and hardstand, thereby reducing the proportions to a more human scale and providing interest and activation of the facades.

6.1.4 Built Form and Urban Design

6.1.4.1 Existing Environment

The subject site is adjoined by existing industrial development and is currently occupied by several outdated warehouse buildings, structures and hardstand. The consolidation of two existing industrial sites has created an opportunity to provide a new multi-level, multi-tenanted warehouse and distribution centre. Analysis of the subject site is provided in **PART 2** of this EIS.

6.1.4.2 Assessment of Impacts

Built Form and Urban Design

Architectural Drawings and an Architectural Design Report have been prepared by SBA Architects and are attached as **Appendix 4** and **Appendix 5**, respectively.

The development is divided into three main buildings. Warehouse A and B have frontage to Percival Road and are two-storey, with additional mezzanine levels¹. Warehouse C has frontage to Britton Street and accommodates an additional storey at lower ground level, due to the 10m difference in proposed site levels. Whilst this building height is 38.6m from FFL (including roof plant), the height of all three (3) buildings is consistent at RL 62.35.

The CLEP 2021 does not provide a maximum building height control or maximum FSR for the subject site. Therefore, the bulk and scale of the development has been considered in relation to the context of the surroundings. The site is located within an established industrial area and is not located in close proximity to residential or sensitive land uses.

The development proposes a building setback of 15m from both Britton Street and Percival Road, which provides opportunity for landscaping and large canopy tree planting at the front boundaries. The landscaping strategy incorporates plants native to the area, which will soften the appearance of the built form and enhance the streetscape. Along the side boundaries, the building is setback between 6m – 10m, which will be planted with trees and shrubs.

The massing of the development can be broken down into three main buildings, which is further defined through the location of offices, vertical stairs and cores. Detailed consideration has been given to the materials and finishes. Contrasting colours, as well as glazing and diffused mesh screens are provided at the office areas. This approach enables the treatment of the offices to stand out and extend across the warehouse and hardstand.

Although the proposed development is larger in scale to the existing development, the proposed height has been driven by the relevant height clearances for modern racking systems and warehouse developments. The proposal provides an innovative approach to respond to the shortage of industrial land across the Greater Sydney region, whilst providing a positive visual outcome for the subject site.

Signage

The proposal incorporates the following signage across the subject site:

¹ Building A and B height is 28.6m from FFL including roof plant



- Wall mounted and illuminated business identification sign on Percival Road;
- Wall mounted and illuminated business identification sign on Britton Street;
- Freestanding business identification signs on Britton Street Percival Road, identifying each tenancy name;
- Wall mounted business identification signs, identifying each tenancy name; and
- Freestanding directional signage at vehicle entrance points and pedestrian entrance points on Britton Street and Percival Road.

The proposed locations, dimensions and details of the signage are shown within the Architectural Drawings, attached as **Appendix 4**. The signage proposed enables efficient wayfinding and identification of the tenancies and is compatible with the industrial character of the surrounding area.

Building Code of Australia

A BCA Assessment Report has been prepared by BM+G for the proposal and is attached as **Appendix 7**. The report provides an assessment of the Architectural Drawings against the Deemed-to-Satisfy provisions of the *Building Code of Australia 2022* (BCA).

The report identifies that the proposed development can readily achieve compliance with the BCA, subject to resolution of the matters identified in the report. This can be achieved by way of fire engineered performance solutions or plan amendments prior to the Construction Certificate stage.

Accessibility

An Accessibility Report has been prepared by ABE Consulting for the proposal and is attached as **Appendix 8**. The report confirms that the proposed development is capable of complying with the relevant accessibility requirements, subject to detailed design.

6.1.5 Visual Impact

Geoscapes has prepared a Visual Impact Assessment Report for the proposed development, which is included as **Appendix 9** of this EIS.

6.1.5.1 Existing Environment

The subject site is located centrally within the industrial area of Smithfield. It is surrounded by other industrial land use and buildings to the north, south, east and west. To the west this character extends several kilometres towards Prospect Reservoir and to the edge of Witherill Park. Immediately north is land used for infrastructure, which includes the Liverpool-Parramatta Transit-way and water supply trunk pipelines that run east-west from Prospect Reservoir.

The arterial road networks of the A28 (Cumberland Highway) run through Smithfield from north to south and carry a large volume of commuters and commercial vehicles through Western Sydney.

Warehousing is generally of larger scale along the Percival Street side with Britton Street containing smaller units and commercial workshops.

Landscaping within the subject site along Britton Street is sloped up from the street to warehousing. Planting is made up of large, turfed areas with pockets of hedging and scattered native large canopy trees. The trees help to screen and reduce the visual presence of warehousing on the site. No public footpath is present on either side of the road. Landscaping along Percival Street is similar with more linear and defined hedging along the boundary with scattered large native trees. A narrow footpath is present adjacent to the site boundary, but no footpath is present on the eastern side of the road.

Visual quality within the immediate context can be described as generally low with most warehousing of older construction, though some newer buildings have started to emerge over the last 10 years.

6.1.5.2 Assessment of Impacts

Geoscapes has provided a visual impact assessment of the proposed development from seven (7) viewpoints surrounding the subject site, as outlined below and in **Figure 23**.

- Tait Street Park, Smithfield (VP1)
- Britton Street, Smithfield (Approach from South) (VP2)
- Percival Road, Smithfield (Approach from South) (VP3)
- Percival Road, Smithfield (Approach from North) (VP4)
- Adjacent to 163 Gardenia Parade, Greystanes (VP5)
- Adjacent to 111 Canal Road, Greystanes (VP6)
- Adjacent to 7 Dell Street, Woodpark (VP7)

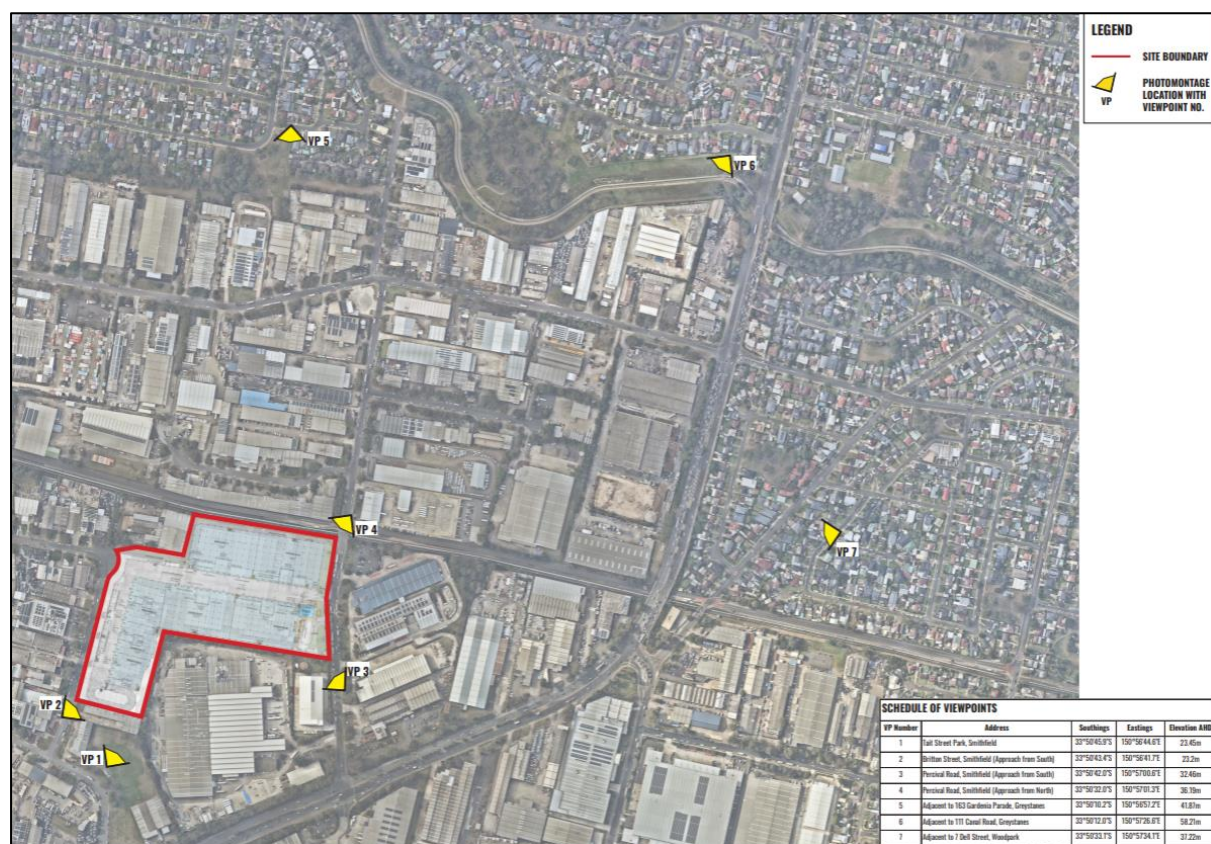


Figure 23. Visual Impact Assessment Viewpoint Locations (Source: Geoscapes, 2024)

A summary of the analysis is provided below:

Viewpoints surrounding the subject site (VP1 – VP4)

The sensitivity of visual receivers in the immediate context (represented by VP1 to VP4) would be low. This is due to the industrial character of the surrounding area and the type of people viewing the development. Pedestrian numbers around the subject site within the public domain are likely to be low and consist mainly of workers from adjacent facilities. Views experienced by passing motorists or people on public transport from adjacent roads are transient, only temporary and therefore, visual impacts will be less significant. At further distances within the residential areas of Greystanes and Woodpark, views towards the development are generally filtered and screened by vegetation or other buildings. However, the influence of industrial development is still present and therefore, the sensitivity of the view experienced is also reduced.

Though the development is of greater bulk and scale than the existing facility on the subject site, the magnitude of change seen from the existing to the proposed development is partially mitigated by the retention of many of the existing trees to the boundaries of both Britton Street and Percival Road. These in combination with proposed additional landscaping help to maintain the visual screen and sit the building more comfortably within the site and public domain.

TABLE 15 provides an assessment of the visual impacts from each viewpoint surrounding the subject site.

TABLE 15: VISUAL IMPACT ASSESSMENT VP1 – VP4			
Viewpoint Location	Visual Receptor Sensitivity	Magnitude of Change	Significance of Visual Impact
VP1: Tait Street Park	Low	High	Moderate / minor
VP2: Britton Street south	Low	High	Moderate / minor
VP3: Percival Road south	Low	Low	Minor negligible
VP4: Percival Road north	Low	Medium	Minor

The magnitude of change for each viewpoint is shown in **Figure 24 - Figure 27** below. Images on the left are pre-development scenarios and images on the right are post-development scenarios which incorporate landscaping after 15 years.

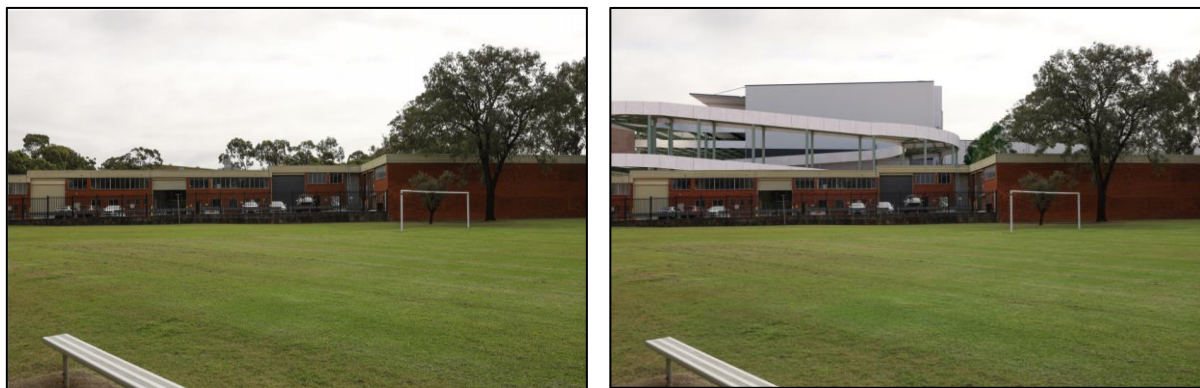


Figure 24. Magnitude of Change for Viewpoint 1 (Source: Geoscapes, 2024)



Figure 25. Magnitude of Change for Viewpoint 2 (Source: Geoscapes, 2024)



Figure 26. Magnitude of Change for Viewpoint 3 (Source: Geoscapes, 2024)



Figure 27. Magnitude of Change for Viewpoint 4 (Source: Geoscapes, 2024)

Viewpoints within residential areas (VP5 – VP7)

The magnitude of the change is low to very low for people living in residential areas to the north and east. This is due to a combination of the development being screened by existing vegetation or hidden by other buildings, and also the context in which the change is viewed against. Residential areas to the south are given the same assumptions regarding their potential sensitivity and magnitude of change. These areas are also at greater distance from the development and their baselines would contain a large proportion of the Smithfield industrial precinct within the view. Therefore, a similar minor significance of visual impact can be assumed.

TABLE 16 provides an assessment of the visual impacts from each identified viewpoint within residential areas.

TABLE 16: VISUAL IMPACT ASSESSMENT VP5 – VP7			
Viewpoint Location	Visual Receptor Sensitivity	Magnitude of Change	Significance of Visual Impact
VP5: 163 Gardenia Parade, Greystanes	Medium	Low	Minor
VP6: 111 Canal Road, Greystanes	Medium	Very low	Minor negligible
VP7: 7 Dell Street, Woodpark	Medium	Low	Minor

The magnitude of change for each viewpoint is shown in **Figure 28 - Figure 30** below. Images on the left are pre-development scenarios and images on the right are post-development scenarios which incorporate landscaping after 15 years.



Figure 28. Magnitude of Change for Viewpoint 5 (Source: Geoscapes, 2024)



Figure 29. Magnitude of Change for Viewpoint 6 (Source: Geoscapes, 2024)



Figure 30. Magnitude of Change for Viewpoint 7 (Source: Geoscapes, 2024)

Summary

The subject site is designated for industrial development under the CLEP 2021 and has existing industrial uses. Therefore, a new industrial development in this location is not out of place with existing or future character.

The proposed landscape planting along the boundaries of the subject site can be helpful in filtering and blending the development into its surrounding context. This is especially true along the northern, eastern and western facades, where proposed landscaping is expected to filter views. Proposed planting will be most effective after a period of 15 years, at which point the trees are expected to reach maturity.

No view assessed was considered to have high scenic value and considering the mitigation measures proposed, which include a careful selection of materials and colours, a high-quality architectural façade design, the retention of many trees on the subject site and proposed landscaping, the visual impacts associated within the proposal are considered to be acceptable.

6.1.6 Traffic, Transport and Accessibility

Arup has prepared a TAIA, including a draft CTMP and Green Travel Plan (GTP), which is attached as **Appendix 10**. The following subsections summarise the findings of the TAIA.

6.1.6.1 Existing Environment

The subject site is bound by Percival Road to the east, the Liverpool to Parramatta Transit-way to the north and Britton Street to the west. Warren Road / Cumberland Highway is the main arterial road closest to the subject site that provides connections to wider Greater Sydney via the arterial and motorway network. Warren Road carries high volumes of traffic, including heavy vehicles, and has a posted speed limit of 70 km/h.

From Warren Road, Lot 34 DP617521 is accessed via Percival Road and Lot 1 DP597082 is accessed via Britton Street and Long Street. Percival Road and Britton Street are local roads with a posted speed limit of 50km/h.

There are currently three (3) existing vehicle crossings which service Lot 1 DP597082 on Britton Street and two (2) existing vehicle crossings that service Lot 34 DP617521 on Percival Road.

6.1.6.2 Assessment of Impacts

Operational Access

Access to the proposed development for heavy vehicles is provided only at lower ground level on the southern end of Britton Street. Exit for heavy vehicles is provided separately at lower ground level on the northern end of Britton Street, as well as two points on Percival Road².

Access to the subject site for light vehicles is provided at four (4) locations, including:

- The southern end of Britton Street provides entry and exit for light vehicles using the at-grade carpark. This also includes access to the southern fire brigade road;
- The northern end of Britton Street provides entry and exit for light vehicles using the main carpark at mezzanine level. This also includes access to the northern fire brigade road; and
- The southern end of Percival Road provides entry and exit for light vehicles using the at-grade carpark; and
- The northern end of Percival Road provides access only for emergency vehicles, which connects to the internal perimeter road along the site's boundary. Emergency vehicles can also obtain access via the three (3) vehicle crossings identified above.

All existing vehicle crossings will be decommissioned to enable the construction of the crossovers identified above. There is an overall net increase of the number of driveways in the proposed development compared to the existing situation, which will result in a minor reduction of on-street car parking. However, this reduction would be offset by the provision of adequate off-street parking provision within the development for employees and visitors (refer below). Therefore, the overall impact on kerbside parking is expected to be minor. The new driveways would be located to provide improved sight distances and allow for separate truck and car access to improve safety.

As discussed within the TAIA, the loading bay provision is compliant with the requirements of the CDCP 2021, and vehicle queueing is not expected to occur on the external road network. Additional space is also provided in the loading docks for vehicles to wait or park, which would provide further contingency to avoid queueing on the external road network.

² One exit on Percival Road is for ground level and one exit is a ramp from Level 1



Operational Parking

TABLE 17 provides a summary of the car parking rates required by the CDCP 2021 for each use, and the total number of carparks provided. This confirms that sufficient parking is provided onsite to cater for the proposed development.

TABLE 17: CAR PARKING RATES				
Land use	GFA (m ²)	DCP parking rate	Parking required	Parking proposed
Warehouse	88,976m ²	1 per 300m ² GFA	297	482 (including 7 accessible parking spaces)
Office	7,036m ²	1 per 40m ² GFA	176	
Café	71m ²	Assumed zero as linked/ multi-purpose trips		
Total required			473	

Bicycle and Motorcycle Parking

TABLE 18 provides a summary of the bicycle parking rates required by the CDCP 2021 for each use, and the total number of bicycle parks provided. This confirms that sufficient bicycle parking is provided onsite to cater for the proposed number of staff. End of trip facilities, including bicycle parking spaces, showers, changerooms and lockers are provided at two locations at Britton Street and Percival Road. Whilst no motorcycle parking requirements are listed in the CDCP 2021, a total of 9 spaces are provided.

TABLE 18: BICYCLE PARKING RATES				
Land use	GFA (m ²) or number of staff	DCP parking rate	Parking required	Parking proposed
Warehouse	88,976m ²	Nil	0	80
Office	7,036m ² / 700 staff	Staff: 1 per 10 staff Visitor: 1 per 750m ² over 1000m ²	79	
Café	71m ²	Staff: 1 per 100m ²	1	
Total required			80	

Operational Traffic Generation

The proposed land uses include warehouse, ancillary office and a café. Given that surrounding land use is industrial, it is assumed that trips generated by the café would be linked / multi-purpose trips. Café staff are assumed to arrive outside of commuter peak traffic periods. Therefore, to avoid double counting, independent trips for the café have been excluded from the traffic generation.

TABLE 19 provides a summary of the AM and PM peak hour trips generated by the existing development and the proposed development, including the net change.

TABLE 19: TRAFFIC GENERATION						
Peak hour	Yield (m ² GFA)		Peak hour trip rate (per 100m ² GFA)	AM and PM peak hour trips		
	Existing	Proposed		Existing	Proposed	Net change
AM	48,796m ² warehouse/ office	96,568m ² warehouse/ office	Industrial: 0.52 per 100m ² GFA	253	502	249
PM			Industrial: 0.56 per 100m ² GFA	273	541	268



The peak hour traffic generation is assumed to correspond to the staff peak travelling to and from the site in light vehicles. Accordingly, it is assumed that 90% of peak hour traffic generation is light vehicles and 10% heavy vehicles. Therefore, the net increase in traffic generation of the proposed development is 224 light vehicles and 25 heavy vehicles in the AM peak hour and 241 light vehicles and 27 heavy vehicles in the PM peak hour.

The key access intersections have been assessed using SIDRA modelling. This includes the intersection of Cumberland Highway / Long Street / Herbert Place (Long Street intersection), and the intersection of Cumberland Highway / Percival Road (Percival Road intersection).

In the existing 2024 scenario, both the Long Street and Percival Road intersections operate at an efficient Level of Service B in the AM peak hour and Level of Service C or D in the PM peak hour³.

In the Future 2028 and 2034 'Without Proposal' scenario, additional background traffic growth is expected to increase intersection degree of saturation. It is assumed that optimisation of traffic signals for the highest volume of traffic movements (along Cumberland Highway) would reduce average delay and help to accommodate background traffic growth. Therefore, overall intersection performance is expected to be generally similar to the existing 2024 scenario.

In the Future 2028 and 2034 'With Proposal' scenario, average delay is expected to worsen only slightly when compared to the corresponding 'Without Proposal' scenarios. Overall intersection performance is expected to remain satisfactory at Level of Service D or better across both the AM and PM peak hours.

Therefore, based on a conservative modelling approach, the proposed development is expected to have a minor impact on the surrounding road network during peak periods. Road upgrades or infrastructure works in the surrounding road network are not considered to be required to accommodate the proposed development.

6.1.6.3 Management and/or Mitigation Measures

Construction Traffic

A preliminary CTMP has been prepared by Arup, forming part of the TAIA in **Appendix 10** of this EIS. A summary of the draft CTMP is provided below.

- Construction worker and heavy vehicle parking would be accommodated on-site where possible to minimise impacts on surrounding local streets.
- Construction would be undertaken during standard working hours. In some circumstances it may be necessary to undertake night works to minimise the disruption construction has on traffic. Further assessment of these requirements would be undertaken once the detailed design stage is undertaken and the requirements are known.
- Heavy construction vehicles would travel on TfNSW's restricted access vehicle routes for access to the subject site (Percival Road, Britton Street, Cumberland Highway, Woodpark Road and Long Street).
- A maximum of 100 heavy construction vehicles per day would access the subject site. During the AM and PM peak hours, it is anticipated that up to 10 vehicles (10 inbound and 10 outbound movements) would access the subject site. Heavy construction vehicles would be scheduled to non-peak traffic periods where possible and are assumed to occupy the subject site for less than one hour.
- In addition to heavy construction vehicles, workers accessing the subject site would generate additional light vehicles. This would include cars, vans and utility vehicles. During the peak construction stage, a maximum workforce of up to 100 personnel is expected per day. It is assumed that all workers would drive their own vehicle and that 50% would arrive during the AM peak hour (7:15am to 8:15am) and 50% would depart during the PM peak hour (4:15pm to 5:15pm).

³ The following level of service criteria for intersections are: B: Good with acceptable delays and spare capacity, C: Satisfactory, D: Operating near capacity.



5:15pm). Therefore, construction workers are expected to generate an additional 50 inbound trips in the AM peak hour and 50 outbound trips in the PM peak hour.

The traffic generation during construction is expected to be lower than during operation and thus likely to have less impact on the road network. Construction planning and timeframes for construction have not yet been finalised. Therefore, the cumulative construction traffic with nearby developments should be considered as part of a detailed CTMP once further construction planning inputs are available.

Green Travel Plan

A GTP has been prepared by Arup, forming part of the TALA in **Appendix 10** of this EIS. The GTP aims to address travel demand and outlines potential sustainable travel initiatives for the proposed development. The key element of the GTP is reducing reliance on private vehicles and maximising the use of public transport and other sustainable modes of transport. The GTP would contribute to a healthier and higher quality of life for building tenants, staff and visitors whilst reducing air and noise pollution.

6.1.7 Trees and Landscaping

An Arboricultural Impact Assessment and Tree Protection Management Plan has been prepared by Canopy Consulting and are attached as **Appendix 26**. A summary is provided in the following sections.

6.1.7.1 Existing Environment

A total of 454 trees were assessed on the subject site and neighbouring boundaries, under 278 tree tags⁴. The subject site features a diverse array of trees, including indigenous, native, and exotic species (described further in **Section 6.1.9** of this EIS). Primarily, in situ trees were intentionally planted. However, *Olea europaea subsp. cuspidata*, an exotic tree species with self-seeding tendencies, is likely spreading naturally throughout the subject site.

6.1.7.2 Assessment of Impacts

The trees proposed to be removed and retained are identified in **TABLE 20** below.

TABLE 20: TREE REMOVAL					
Recommendation	Tag / Tree Quantity	High – Priority for Retention	Medium – Consider for Retention	Low – Consider for Removal	Priority for Removal
Remove – project impacts	166 tags / 252 trees	22, 25, 35, 38, 39, 44, 45, 58, 77, 78, 79, 80, 81, 82, 83, 110, 111, 120, 128, 131, 136, 150, 160, 166, 188, 197, 199, 203, 236, 237, 238, 239, 240, 242, 247, 259, 269, 273	16, 28, 29, 31, 32, 33, 36, 37, 61, 92, 99, 102, 106, 108, 154, 156, 157, 161, 164, 165, 185, 189, 190, 191, 193, 195, 196, 198, 207, 212, 231, 234, 235, 241, 243, 251, 254, 255, 256, 257, 264, 267, 268, 270, 274	1, 5, 6, 7, 8, 9, 10, 17, 24, 27, 30, 34, 40, 41, 43, 57, 63, 65, 66, 69, 75, 85, 86, 87, 88, 91, 93, 100, 101, 103, 104, 105, 107, 109, 124, 137, 138, 139, 148, 151, 153, 158, 162, 163, 167, 168, 169, 170, 171, 172, 173, 174, 175, 177, 178, 179,	N/A

⁴ Where trees shared similar attributes and locations and were of lower significance, they were grouped together.



		Tag QTY: (38) Tree QTY: (38)	Tag QTY: (45) Tree QTY: (48)	180, 181, 182, 192, 194, 200, 202, 204, 205, 209, 214, 215, 217, 221, 230, 232, 233, 244, 245, 250, 252, 253, 258, 261, 265, 266, 275 Tag QTY: (83) Tree QTY: (166)	
Remove – irrespective (due to health, structure or weed status)	26 tags / 77 trees	N/A	N/A	N/A	20, 26, 59, 60, 62, 64, 67, 70, 73, 74, 84, 89, 90, 94, 118, 130, 134, 149, 152, 155, 159, 176, 186, 201, 220, 246 Tag QTY: (26) Tree QTY: (77)
Retain – generic	39 tags / 48 trees	21, 54, 112, 114, 115, 119, 121, 129, 141, 144, 184 Tag QTY: (11) Tree QTY: (11)	23, 56, 97, 113, 122, 123, 126, 132, 133, 142, 143, 146, 183 Tag QTY: (13) Tree QTY: (22)	2, 3, 4, 11, 12, 13, 14, 15, 42, 117, 135, 140, 145 Tag QTY: (13) Tree QTY: (13)	68, 98 Tag QTY: (2) Tree QTY: (2)
Retain – generic plus (requiring alternative design or construction methods)	47 tags / 77 trees	18, 19, 50, 53, 71, 72, 116, 125, 127, 147, 218, 219, 228, 263 Tag QTY: (14) Tree QTY: (17)	4 8, 49, 52, 55, 76, 95, 96, 187, 210, 211, 222, 226, 227, 229, 260, 262 Tag QTY: (16) Tree QTY: (31)	46, 47, 51, 206, 208, 216, 223, 224, 225, 248, 249, 271, 272, 277, 278 Tag QTY: (15) Tree QTY: (18)	213, 276 Tag QTY: (2) Tree QTY: (11)

Trees to be removed

A total of 252 trees are proposed to be removed due to:

- Being within the hardstand and/or development footprint for driveways, crossover, retaining walls or building;
- Being subject to unsustainable cut and fill activities that cannot be mitigated; and/or
- Being within a group of trees where larger trees will be removed due to project impacts and remaining trees are of a shape or form and that their retention may cause an unacceptable level of risk or undesirable tree form.

This comprises:

- 38 high retention value trees;
- 48 medium retention value trees;



- 166 low retention value trees. This also includes 15 Council street trees along Percival Road and Britton Street; and

In addition, 77 trees are recommended for removal irrespective of development due to their poor health and/or structural condition and/or weed status. These trees are exempt under the CDCP 2021 and therefore do not require development consent for their removal.

Engagement with Council has been undertaken in regard to the removal of street trees. Council has advised that the nine (9) identified trees in Britton Street were originally planted without Council permission and are not considered appropriate for the existing location. The six (6) identified trees on Percival Road are also not in the best condition due to aggressive trimming for the overhead transmission lines. Council considers their retention value to be low and more appropriate trees would be better suited. 25 new street trees are proposed along Britton Street and Percival Road and are based on Council's preferred tree planting list.

To offset the impacts arising from the tree loss, a site-wide Landscape Plan has been prepared (**Appendix 11**). The resulting landscape characteristics of the proposed development include:

- A landscaped area of 13,428m², representing 15.31% site coverage;
- A total of 215 new trees and 12 tree ferns to be planted;
- A total of 28 trees to be incorporated into the outdoor amenity area; and
- A total canopy cover of 7,898m², representing 9% site coverage.

Trees to be retained

Trees 18, 19, 52, 76, 116, 125, 127, 147 will be subject to major Tree Protection Zone (TPZ) encroachments of up to 25%, but remain outside the structural root zone. Given the health and species of the trees and relative percentages of encroachment, it is expected these trees will tolerate root disturbance provided plant health techniques are employed and followed through construction, in addition to tree protection measures.

Trees 95, 96, 248, 249, 260, 262, 263, 271, 272, 276, 277, 278 are located within 23 Britton St and Trees 52, 55, 71, 72, 76, 187, 206, 208, 210, 211, 213, 216, 218, 219, 222, 223, 224, 225, 226, 227, 228, 229 are located within 2 Percival Road. These will be subject to major cut and fill based on the current bulk earthworks plans. For these trees to be retained, this area of the design will need to be modified to be either completely outside the TPZ or not result in an encroachment of greater than 15%. Where the level of encroachment may exceed 15%, detailed root investigations will be required to guide the type and location of potential engineered solutions that will be necessary to retain these trees.

In addition, the conflicts with the crown of trees 112-147 along the Britton Street frontage will need to be carefully analysed by a consulting arborist and the architect to determine what pruning will be required to facilitate the construction, including any scaffold or similar apparatus required for construction.

All remaining trees will be subject to a minor or nil encroachment and can therefore be retained with generic protection measures.

6.1.7.3 Management and/or Mitigation Measures

Offset Planting

The following recommendations have been derived from the AIA and incorporated into the Landscape Plans:



- Any tree approved to be removed from a site should be replaced with a tree of like habit and indigenous to the LGA where possible, planted as near as practicable to the location of the removed tree, grown to maturity and replaced if the planting fails to survive and thrive.
- Suggested species for replacement include:
 - *Eucalyptus paniculata* (Cabbage Gum)
 - *Eucalyptus tereticornis* (Forest Red Gum)
 - *Syncarpia glomulifera* (Turpentine)
 - *Eucalyptus punctata* (Grey Gum)
 - *Eucalyptus baueriana* (Blue Box)
- Trees should be sourced from a reputable nursery with stock grown to NATSPEC and Australian Standard AS 2303:2018 Tree Stock for Landscape Use criteria.
- Trees should be a minimum of 100L pot size at the time of planting.
- The trees should be planted and mulched with suitably composted, natural, hardwood mulch.

Tree Protection

Tree protection measures are required to protect existing trees to be retained on the subject site during construction works. The AIA includes a Tree Protection Plan which must be adopted during construction works.

6.1.8 Ecologically Sustainable Development (ESD)

6.1.8.1 Assessment of Impacts

The principles of ESD as outlined in Clause 193 of the EP&A Regulation have been carefully considered in **Section 7.1.5** of this EIS.

The vision for the development is to create a world class facility for industrial businesses with an emphasis on design quality, sustainability, innovation and a complementary mix of estate occupants. The development will incorporate various sustainable design and construction initiatives to ensure it meets the requirements outlined in the SEARs. This is described in detail in Section 3 of the ESD Report, attached as **Appendix 12** and summarised below:

- Reducing carbon and greenhouse gas emissions;
- Providing a strong focus on waste minimisation in design, construction, operation and end-of life;
- Providing excellent indoor environment quality and accessible amenity spaces;
- Minimising impacts on biodiversity, incorporating on-site landscaping and water-sensitive urban design measures;
- Incorporating climate change risk resilience; and
- Incorporating measures to reduce water and energy consumption.

The ESD report concludes that subject to detailed design, the proposed development will be capable of achieving the following sustainability targets:

- Net zero emissions by 2050;
- The relevant requirements of Schedule 3 of State Environmental Planning Policy (Sustainable Buildings) 2022, including:
 - the minimisation of waste from associated demolition and construction;
 - a reduction in peak demand for electricity;
 - a reduction in the reliance on artificial lighting and mechanical heating and cooling through passive design;
 - the generation and storage of renewable energy;
 - the metering and monitoring of energy consumption; and
 - the minimisation of the consumption of potable water.



The ESD initiatives being considered for the proposed development demonstrate that the proposal will meet or exceed the required SEARs, industry standards, and the sustainability pillars set by the NSW Government's Net Zero Plan.

6.1.9 Biodiversity

Écologique has prepared a Biodiversity Development Assessment Report (BDAR) in accordance with the requirements of the *Biodiversity Assessment Method 2020* (BAM) and the BC Act. This is attached as **Appendix 13** and summarised below.

6.1.9.1 Existing Environment

The subject site is mapped as containing areas of "remnant native vegetation" under the CLEP 2021, as depicted in **Figure 8** of this EIS. The majority of vegetation within this area has been cleared under DA2017/355/1, as described in **Section 2.3** of this EIS, and therefore mapping is not reflective of the existing environment.

Écologique has undertaken field surveys of the subject site and has subsequently mapped existing vegetation (refer **Figure 31**). This comprises an area of approximately 0.99ha of planted native vegetation and 1.2ha of exotic vegetation.



Figure 31. Native Vegetation Cover (Source: écologique BDAR, 2024)

The BDAR identifies (3) threatened flora species that have been planted at the subject site, including:

- *Doryanthes palmeri* (giant spear lily): listed as “vulnerable” under the BC Act. The species occurs in far northeast NSW and southeast Queensland.
- *Eucalyptus nicholii* (narrow-leaved black peppermint): listed as “vulnerable” under both the BC and EPBC Acts.
- *Eucalyptus scoparia* (Wallangarra white gum): listed as “endangered” under the BC Act and “vulnerable” under the EPBC Act.

The BDAR identified that the subject site has the potential to provide low quality foraging habitat for the following highly mobile species:

- *Callocephalon fimbriatum* (gang-gang cockatoo)
- *Calyptorhynchus lathami lathami* (glossy black cockatoo)
- *Glossopsitta pusilla* (little lorikeet)
- *Falsistrellus tasmaniensis* (eastern false pipistrelle)
- *Pteropus poliocephalus* (grey-headed flying-fox)

No areas of outstanding biodiversity value, as identified under the BC Act, are located within the subject site. Furthermore, the subject site is not identified as biodiversity certified land.

6.1.9.2 Assessment of Impacts

Vegetation

The proposal has avoided 25% of the planted native vegetation on the subject site. This includes the retention of existing trees at the frontage of Britton Street and Percival Road where possible to ensure canopy cover from day one. This has been supplemented with additional proposed trees, shrubs and groundcovers to assist with the screening of the building.

The BDAR evaluates the removal of planted native vegetation in accordance with the BAM Streamlined Module. The assessment concludes that the vegetation proposed to be removed is geographically restricted to areas that are substantially distanced from the subject site, were cultivated for use in landscaping, and are not expected to occur naturally within the subject site. Therefore, biodiversity credits are not required, and assessment must be undertaken to determine whether there is potential for the planted native vegetation to provide habitat for threatened species. This is discussed below.

Habitat

Potential habitat available on the subject site includes the following:

- Eucalypts and other flowering perennial species may provide nectar resources suitable for a range of highly mobile arboreal and flying fauna (i.e., grey-headed flying fox and nectivorous bird species);
- One hollow-bearing tree containing a small (< 5 cm) hollow was recorded in the study area; and
- Decorticating bark can provide potential roosting habitat for threatened microbat species.

The buildings and structures located on the subject site do not provide roosting habitat for threatened microbat species.

Historical clearance, agricultural land use and further commercial/industrial modification of the subject site has resulted in existing low-quality habitat for fauna. The subject site is located within a predominantly hardstand environment, surrounded by busy arterial roads, and commercial and industrial development. The combination of noise and light pollution further decreases the suitability of any potential habitat for threatened fauna species.



The BDAR has undertaken tests of significance to determine whether the proposal is likely to significantly affect the below listed threatened species, or their habitats:

- *Callocephalon fimbriatum* (gang-gang cockatoo)
- *Calyptorhynchus lathami lathami* (glossy black cockatoo)
- *Glossopsitta pusilla* (little lorikeet)
- *Falsistrellus tasmaniensis* (eastern false pipistrelle)
- *Pteropus poliocephalus* (grey-headed flying-fox)

The assessment determined that the subject site does not contain a viable population of the above species and does not contain habitat of importance to the above species. Therefore, the proposal is considered unlikely to result in an adverse effect on the species directly or indirectly.

Indirect impacts

The BDAR identifies the following minor indirect impacts that may result from the proposal:

- Dust and sedimentation during construction: Smothering of ground layer vegetation can affect health through a decrease in photosynthesis. Providing that best practices in erosion and sedimentation management and dust management are implemented, the consequence of this impact is considered to be a low risk.
- Noise: Noise impacts are expected to be low given the lack of fauna habitat. Resident fauna would be habituated to a high level of noise due to the busy urban location, manufacturing activities and heavy traffic surrounding the subject land.
- Transport of weeds and pathogens: Construction activities may introduce pathogens and other weeds to the subject land on machinery, tools, equipment and clothing (e.g., boots). Providing that weeds are continually managed, and hygiene protocols are followed during construction and operational phases of the project, the risk of weed and pathogen infestation is low.

Impacts on MNES

The BDAR confirms that the proposal would not result in a significant impact on any MNES and a referral under the EPBC Act is not required.

6.1.9.3 Management and/or Mitigation Measures

Landscaped areas on the subject site will include native planting as well as species indigenous to the subject site (refer Landscape Plans in **Appendix 11**).

The proposal's potential indirect impacts on biodiversity values will be mitigated through a range of measures, which would include, but may not be limited to, the following:

- Pre-clearance of vegetation: The pre-clearing process provides a final check for the presence of fauna species in the development site immediately before clearing begins. The pre-clearing survey is required to:
 - Identify and record the details of all habitat features (including where applicable: GPS location; species or type of habitat feature) for inclusion on site map(s);
 - Mark any habitat features that will be cleared, using suitable methods; and
 - Locate nearby habitat suitable for the release of fauna that may be encountered during the pre-clearing or clearing stages; and
 - Locate suitable areas for relocation of habitat features if any (e.g., large woody debris).
- Clearance of vegetation and fauna rescue and relocation protocol: Where habitat features are identified in pre-clearing surveys, a two-staged clearance process shall be undertaken and an experienced ecologist present to supervise the process, act as a fauna spotter and relocate



any fauna captured. This shall include sufficient notification to proximal veterinarian surgeons and wildlife carers of the intent to commence clearance works and determining nearby locations where any injured or otherwise immature and susceptible fauna may be released.

- Euthanasia protocol;
- General biosecurity duty (GBD) compliance;
- Unexpected finds protocol; and
- Monitoring and reporting strategies.

These are to be documented in a Flora and Fauna Management Plan (FFMP) as a subplan to the project's Construction Environmental Management Plan (CEMP).

6.1.10 Air Quality

An Air Quality Impact Assessment (AQIA) has been prepared by RWDI for the proposal and is attached as **Appendix 14** of this EIS.

The assessment methodology includes the modelling of local meteorology and the dispersion of potential emissions from the proposed operations to predict potential air quality impacts on the surrounding environment, as summarised below.

6.1.10.1 Existing Environment

The immediate context of the subject site contains industrial activities within the E4 Zone as shown in **Figure 32**. The nearest receptors are industrial land uses (R02 – R06) and recreational land use (R01) located within 50m of the subject site. The nearest residential land use is located 600m from the subject site (R11 and R14).

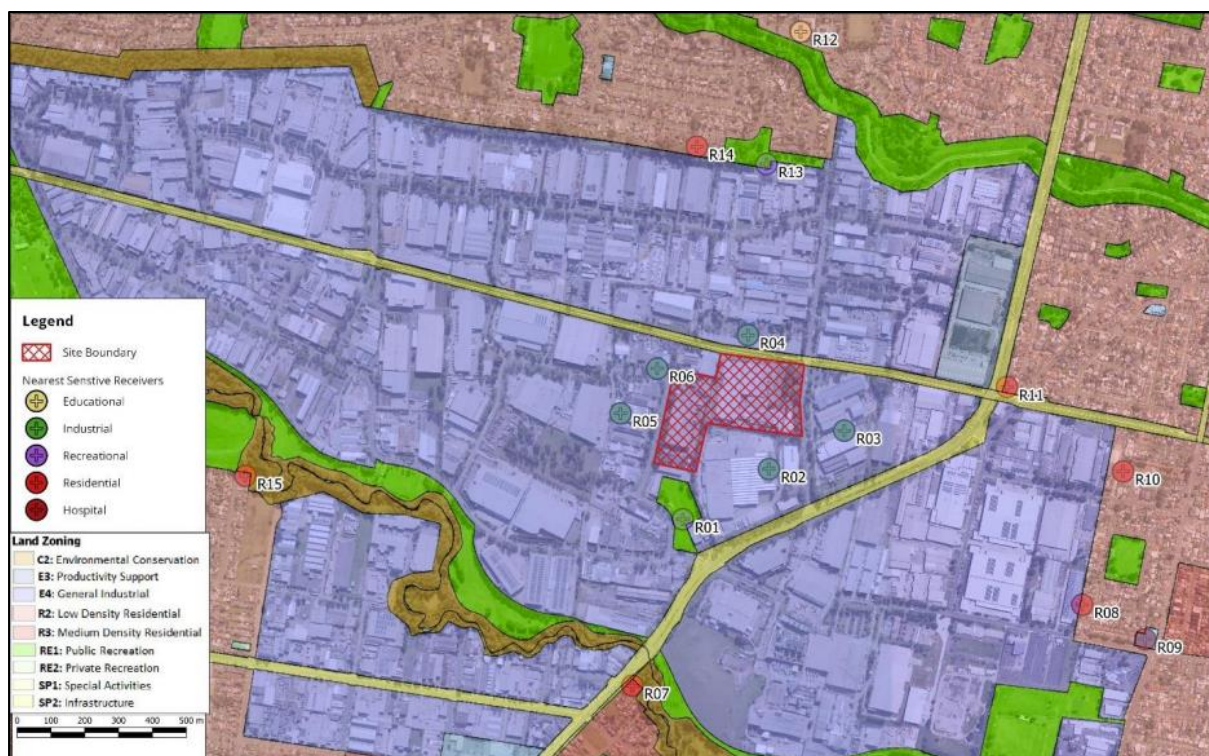


Figure 32. Location of Sensitive Receptors (Source: RWDI AQIA, 2024)

6.1.10.2 Assessment of Impacts

Construction

During the proposed construction activities (demolition, earthworks and construction of buildings and internal road network), short-term periods of elevated dust levels are likely. Dust or airborne particles at elevated levels can be hazardous to human health or cause nuisance. Potential health effects of airborne particles are closely related to particle size. Earthwork activities (including moving of material and truck movements along haul roads) are likely to produce short-term elevated levels of particulate matter (PM₁₀ and PM_{2.5}).

A risk-based approach was adopted to assess dust emissions from the construction of the proposed development in accordance with the Environmental Protection UK (EPUK) and Institute of Air Quality Management (IAQM) *"Guidance on the Assessment of Dust from Demolition and Construction"* (EPUK & IAQM, 2024). The assessment concluded that there would be a medium risk of dust impacts from demolition, and a low risk of dust impacts from all other activities (earthworks, construction and track-out). With the implementation of recommended mitigation measures, no significant air quality impacts are expected to occur during the construction of the proposed development. Mitigation measures are provided in **Section 6.1.10.3** below and will be developed as part of a CEMP.

Operation

Based on typical warehouse usage, the following activities are expected:

- Off-site and on-site vehicular movements including trucks idling; and
- Forklift movements.

These operations would result in wheel-generated dust from vehicles travelling (on sealed roads) within the complex and on the local road network. In addition, contaminant emissions from vehicle exhaust include:

- PM₁₀ and PM_{2.5}; and
- Oxides of nitrogen (NO_x), particularly as nitrogen dioxide (NO₂).

A quantitative approach was adopted to assess air quality impacts on nearby receptors during the operation of the proposed development. The results of the dispersion modelling indicate that particulate matter and nitrogen dioxide (NO₂) concentrations due to the operation of the proposed development would comply with the established criteria at all sensitive receptors, except for 24-hour average fine PM_{2.5} concentrations. The exceedances of the 24-hour average PM_{2.5} criterion are mainly driven by elevated background concentrations, which exceed the 24-hour average PM_{2.5} criterion without contributions from the proposed development. No additional exceedances of the criteria are predicted to occur as a result of the proposed operations and are not anticipated to significantly exacerbate existing elevated background concentrations. Therefore, operation of the proposed development is not expected to adversely affect sensitive receptors.

6.1.10.3 Management and/or Mitigation Measures

To ensure best practice management, the AQIA assessment provides a list of mitigation measures to manage construction dust impacts. These measures will be developed as part of the CEMP.

6.1.11 Noise and Vibration

A Noise and Vibration Impact Assessment (NVIA) has been prepared by RWDI for the proposal and is attached as **Appendix 15**. The NVIA assesses the noise and vibration impacts during the construction and operational stages of the proposal. This is summarised in the following sections.



6.1.11.1 Existing Environment

The subject site is located within an industrial precinct, with the nearest receivers (industrial users) being located directly adjacent to the subject site. The nearest residential receivers are located more than 500m north and east of the subject site. This is depicted in **Figure 33** and outlined below:

Residential

- R1: Suburb of Woodpark
- R2: Suburb of Greystanes

Industrial

- I03: 23-47 Percival Rd, Smithfield NSW 2164
- I04: 2 Percival Rd, Smithfield NSW 2164
- I05: 3 Britton St, Smithfield NSW 2164
- I06: 4 Britton St, Smithfield NSW 2164
- I07: 6 Britton St, Smithfield NSW 2164
- I08: 8-10 Britton St, Smithfield NSW 2164
- I09: 12-14 Britton St, Smithfield NSW 2164
- I10: 16 Britton St, Smithfield NSW 2164
- I11: 18 Britton St, Smithfield NSW 2164
- I12: 25 Britton St, Smithfield NSW 2164
- I13: 23 Britton St, Smithfield NSW 2164
- I14: Unit 2/15 Cullen Pl, Smithfield NSW 2164
- I15: 13 Cullen Pl, Smithfield NSW 2164
- I16: 9-11 Cullen Pl, Smithfield NSW 2164
- I17: 7 Cullen Pl, Smithfield NSW 2164
- I18: 5 Cullen Pl, Smithfield NSW 2164
- I19: 3 Cullen Pl, Smithfield NSW 2164
- I20: 1 Cullen Pl, Smithfield NSW 2164



Figure 33. Location of Sensitive Receptors (Source: RWDI NVIA, 2024)

6.1.11.2 Assessment of Impacts**Operational Noise**

Operational noise generation from the proposed development would primarily derive from the use of heavy vehicles, light vehicles, forklifts and mechanical plant.

Operational noise emissions were modelled using the CadnaA v2023 noise prediction software. The predicted worst case noise levels have been identified at each of the receivers identified in **Figure 33** and compared against relevant noise criteria. This is depicted in **TABLE 21**. Furthermore, **TABLE 22** outlines predicted noise levels from short duration high noise events that may potentially result in sleep disturbance at residential receptors. For example, this may include truck airbrake release and reversing alarms.

In summary, the operational noise assessment predicts there will be no exceedances of the relevant noise criteria at any of the identified receivers.

TABLE 21: OPERATIONAL NOISE LEVELS AT RECEIVERS									
Receiver	Predicted worst case noise level during period⁵			Project Noise Trigger Criteria			Complies (Yes/No)		
	L_{Aeq,15min} dBA			L_{Aeq,15min} dBA					
	Day	Evening	Night	Day	Evening	Night	Day	Evening	Night
R01	32	30	30	40	35	35	Yes	Yes	Yes
R02	34	33	33	40	35	35	Yes	Yes	Yes
I03	55	52	52	68	68	68	Yes	Yes	Yes
I04	57	53	53	68	68	68	Yes	Yes	Yes
I05	59	56	56	68	68	68	Yes	Yes	Yes
I06	55	52	52	68	68	68	Yes	Yes	Yes
I07	57	54	54	68	68	68	Yes	Yes	Yes
I08	57	54	54	68	68	68	Yes	Yes	Yes
I09	56	53	53	68	68	68	Yes	Yes	Yes
I10	56	53	53	68	68	68	Yes	Yes	Yes
I11	56	53	53	68	68	68	Yes	Yes	Yes
I12	54	52	52	68	68	68	Yes	Yes	Yes
I13	57	54	54	68	68	68	Yes	Yes	Yes
I14	49	46	46	68	68	68	Yes	Yes	Yes
I15	48	46	46	68	68	68	Yes	Yes	Yes
I16	35	35	35	68	68	68	Yes	Yes	Yes
I17	35	35	35	68	68	68	Yes	Yes	Yes
I18	35	35	35	68	68	68	Yes	Yes	Yes
I19	35	35	35	68	68	68	Yes	Yes	Yes
I20	35	34	34	68	68	68	Yes	Yes	Yes

⁵ Worse-case meteorological conditions (noise-enhancing) have been adopted from the NVIA



TABLE 22: OPERATIONAL NOISE LEVELS AT RESIDENTIAL RECIEVERS

Suburb	Predicted Noise Level L _{Amax} dBA	Sleep Disturbance Criteria L _{Amax} dBA	Compliance (Yes/No)
Woodpark	29	52	Yes
Greystanes	41	52	Yes

Construction Noise

The construction of the project has been divided into three (3) separate stages for the purpose of this assessment. The typical noise generating equipment associated with each construction stage is outlined below:

- **Stage 1:** Site clearing, demolition and earthworks:
 - Typical plant will be dozer/front end loader, haul trucks, and excavators.
 - It has been assumed that no rock-breaking would be required.
 - Total sound power level for such works is typically 112dBA to 118dBA.
- **Stage 2:** Concrete works:
 - Bored piling/auger is expected in this stage initially.
 - Concrete trucks and pumps will largely dominate the main works in this stage.
 - Total sound power level for such works is typically 105dBA to 109dBA for bored piling, but during the concreting part of this stage, typically 108dBA to 115dBA is expected depending on the number of teams of trucks and pumps.
- **Stage 3:** Building construction
 - This stage is largely expected to include truck deliveries, cranes, and the use of elevated platforms and powered hand tools.
 - There will be up to several teams on each warehouse with expected sound power levels of 108dBA to 114dBA expected with some of the work elevated to greater than 10m when roofing works are being conducted.

Construction noise levels have been assessed for the receivers surrounding the subject site. The typical worst case L_{Aeq,15min} noise levels at the surrounding receivers are provided in **TABLE 23** below. Each of the construction activities are representative of the 'noisiest' construction periods where there may be simultaneous operation of noise intensive construction plant on the subject site. It is anticipated that construction will occur during standard (Std) hours only, however an Out of Hours (OOH) scenario has also been assessed.

Noise affected Noise Management Levels (NML) represents the point which there may be some community reaction to noise. The highly affected NML represents the point which there may be strong community reaction to noise.

TABLE 23: CONSTRUCTION NOISE LEVELS AT RECEIVERS

Stage	Receiver	Noise Level – L _{Aeq,15min} dB						
		Predicted Noise Level at Nearest Receivers		Noise Affected NML				Highly Noise Affected NML
		Standard MET ⁶	Noise-enhancing MET ⁷	Day Std	Day OOH	Evening OOH	Night OOH	
Demolition and Earthworks	Woodpark	<44	<45	45	40	35	35	75
	Greystanes	<42	<44	45	40	35	35	75
	Industrial	61 - 71	62 - 71	75	75	75	75	N/A

⁶ Standard meteorological conditions

⁷ Noise-enhancing meteorological conditions, which may include temperature inversion and wind



Concrete Works	Woodpark	<48	<49	45	40	35	35	75
	Greystanes	<43	<44	45	40	35	35	75
	Industrial	60 - 70	61 - 70	75	75	75	75	N/A
Building Construction	Woodpark	<48	<49	45	40	35	35	75
	Greystanes	<43	<44	45	40	35	35	75
	Industrial	60 – 70	61 - 70	75	75	75	75	N/A

The results of the above assessment are summarised as follows:

- No exceedances to the NMLs are predicted at the industrial receivers at any times;
- No exceedances to the NMLs are predicted in the suburb of Greystanes during standard construction hours;
- Minor exceedances are expected of up to 4dB to the NMLs in the suburb of Woodpark during standard hours with adverse meteorological conditions, and up to 3dB during standard meteorological conditions. This is during Stages 2 and 3 (concrete and building works); and
- No exceedances to the highly noise affected NMLs are expected.

The above conclusions apply to a worst-case scenario, in which works occur in the regions of the subject site in closest proximity to the receivers. Construction noise mitigation is outlined in **Section 6.1.11.3** below.

Construction Vibration

No construction vibration impacts are predicted at residential receivers, provided that the safe working distances presented in TfNSW's *Construction Noise and Vibration Strategy* (CNVS) are adhered to. Vibration impacts are possible at neighbouring industrial sites if vibration intensive equipment is to be operated in close proximity to the site boundary.

Should these pieces of plant be operated within the minimum recommended distances of the CNVS of a sensitive receiver, or if there are any other vibration intensive plant items that the Contractor has concerns for causing disruption at a neighbouring development, it is recommended that a preliminary vibration survey (typically attended vibration measurements) be undertaken of each vibration generating piece of plant. This vibration survey will determine whether there will be any exceedances of the relevant construction vibration criteria. If exceedances are observed, vibration mitigation and management strategies can be developed to minimise vibration impacts as far as practicable, and ideally to be compliant with the vibration criteria.

The vibration management strategy may also include the installation of unattended vibration monitors at sensitive receivers to notify the contractor of any exceedances of the vibration criteria. Any such vibration management strategy should be developed as part of a Construction Noise and Vibration Management Plan (CNVMP).

Construction Vibration: Pipeline

The nearest pipeline is located approximately 3m from the northern boundary. Based on the safe working distances derived for German Standard DIN 4150-3:2016, there is a potential risk of vibration impacts to the pipeline if certain equipment is used on or near the northern boundary. The vibration measures outlined above would also apply to works within proximity to the pipeline. The CNVMP should address potential vibrations impacts on the pipeline and should be developed in consultation with Sydney Water. Preliminary engagement has been undertaken with Sydney Water, as documented within the Engagement Report.



Road Traffic Noise

It is assumed that all traffic accessing the subject site travels via the Cumberland Highway. The nearest residential receivers which will be affected by an increase in traffic on public roads because of the proposed development, are those next to the Cumberland Highway, to the north-east of the subject site.

The NVIA indicated that the increase in noise levels due to the additional traffic generated by the proposal is considered as barely perceptible to the average person and is unlikely to result in any adverse impacts on residential receivers.

6.1.11.3 Management and/or Mitigation Measures

As outlined above, noise levels from construction activities during standard hours may marginally exceed the NMLs at the nearest receivers in the suburb of Woodpark. Therefore, all reasonable and feasible measures should be applied to manage construction noise emissions from the subject site. A detailed CNVMP should be prepared and should include, but not be limited to the following:

- Identification of nearby residences and other sensitive land uses;
- Description of approved hours of work;
- Description and identification of construction activities, including work areas, equipment and duration;
- Description of what work practices (generic and specific) will be applied to minimise noise;
- Consider the selection of plant and processes with reduced noise emissions;
- A complaints handling process;
- Noise monitoring procedures;
- Overview of community consultation required for identified high impact works;
- Overview of community consultation process and assessment required for identified additional works outside of standard construction hours; and
- Induction and training will be provided to relevant staff and sub- contractors outlining their responsibilities regarding to noise.

6.1.12 Ground and Water Conditions

A Geotechnical Assessment has been completed by Douglas Partners for the proposal and is attached as **Appendix 16**. A summary is provided in the following sections.

6.1.12.1 Existing Environment

TABLE 24: GROUND AND WATER CONDITIONS SUMMARY

Matter	Assessment
Geology	Reference to the Penrith 1:100 000 Geological Series Sheet indicates that the site is underlain by Bringelly Shale of middle Triassic age, belonging to the Wianamatta Group. Bringelly Shale typically comprises siltstone, claystone and fine to medium grained sandstone. Reference to the NSW Seamless Geology Map indicates that the majority of the site is underlain by Bringelly Shale however, the south-western portion of the site is underlain by Clastic Sediment of Cenozoic age. The Clastic Sediment comprises alluvial clay, silt, sand and gravel deposits. The general subsurface profile, as indicated by Cone Penetration Tests (CPTs) is outlined below: ▪ Pavement: Asphalt pavement or concrete slab between 50mm to 220mm. ▪ Fill: Variably comprising silty clay, clay, silty sand, clayey sand, gravelly sand encountered to depths of between 0.4m to 1.8m.



	- Alluvial Soil: Soft clay to 2.2m depth over clayey sand / sandy clay to 3.1m, or firm to stiff clay to 2.9m depth. - Residual Soil: Stiff to hard clay with ironstone gravels encountered to depths of between 1m and 2.5m over the eastern, central and southern sides of the site, increasing to about 5m depth in the north-eastern quadrant.
Salinity	The subject site is mapped as “moderate salinity potential”. The results of geotechnical investigations show that “non-saline” and “slightly saline” soils are present at the subject site. Based on the results obtained, a Salinity Management Plan is not required for the proposed works.
Acid sulfate soils	The subject site is not mapped as containing acid sulfate soils. As indicated within the Geotechnical Assessment, given the elevation (RL 23 m to RL 36 m) and the known geology of the site, it is expected that acid sulfate soils are not likely to present on the site.
Groundwater dependent ecosystems (GDEs)	A review of the Bureau of Meteorology Groundwater Dependant Ecosystems Atlas indicates that there are no aquatic, subterranean or terrestrial GDEs within 1 km of the subject site.
Surface Water	No watercourses exist on the subject site or in close proximity to the subject site.
Groundwater	Groundwater was not observed during auguring.

6.1.12.2 Assessment of Impacts

Groundwater

Proposed bulk excavation levels are RL 33.45m for Buildings A and B, and RL 23.45m for Building C. The groundwater measured from the monitoring wells indicate that the groundwater level is approximately 5m below the proposed excavation levels.

As the proposed bulk excavation levels are unlikely to intercept the groundwater table, the *Aquifer Interference Policy* does not apply, and a simple risk-based assessment can be undertaken in accordance with the NSW DPHI *Groundwater Guidelines*.

It is assumed from the measured groundwater levels, that the risk of impact on groundwater and associated groundwater receptors due to the cut and fill earthworks is considered negligible as the development is not expected to significantly intercept the groundwater table. Nevertheless, additional boreholes / wells and longer-term monitoring of groundwater fluctuations should be conducted with the Geotechnical Assessment to be revised if higher groundwater levels are encountered.

During construction and in the long term, it is anticipated that minor seepage into the cut / excavations may still occur, primarily at the clay and rock surface. This could be readily controlled by perimeter and subfloor drainage connected to a sump-and-pump system. Generally, water collected from dewatering operations should be suitable for disposal by pumping to stormwater drains subject to confirmation testing of groundwater quality and approval from the Council.

6.1.13 Water Management

A Civil Engineering Report has been prepared by Costin Roe Consulting for the proposal and is attached as **Appendix 17**. This incorporates a water cycle management strategy and includes the civil engineering drawings. The findings of this report are summarised in this section and **Section 6.1.14** (flooding risk) below.

6.1.13.1 Existing Environment

An existing formal inground drainage system is currently on the subject site which carries stormwater runoff from the existing warehouse and surrounds to Britton Street, Percival Road and a



discharge point to the north which is directed towards the Liverpool-Parramatta Transitway. The existing site drainage system will be decommissioned and removed with the new proposed development receiving a new stormwater drainage network.

6.1.13.2 Assessment of Impacts

Stormwater Quantity

As per general engineering practice and the guidelines of Council, the proposed stormwater drainage system for the development will comprise a minor and major system to safely and efficiently convey collected stormwater run-off from the development to the legal point of discharge.

The minor system is to consist of a piped drainage system, which has been designed to accommodate the 1 in 20-year ARI storm event. The major system will be designed to cater for storms up to and including the 1 in 100-year ARI storm event. The major system will employ the use of defined overland flow paths, such as roads and open channels, to safely convey excess runoff from the subject site. Legal discharge for the subject site is into the existing pit located in Britton Street and existing manhole located to the north of the Percival Road lot.

Cumberland Council require consideration of stormwater quantity management with the intent of minimising flooding from the increased stormwater run-off due to the development. Water quantity management may be made by providing a stormwater detention system (i.e. on-site detention), to limit the runoff discharged from private property or to provide an assessment which confirms on-site detention is not necessary for the development. The site is divided into two catchments for on-site detention calculations. The first catchment area (Catchment 1) generally encompasses the Percival Road allotment is 5.619ha, where the second smaller catchment (Catchment 2) generally includes the Britton Road allotment and is 3.155ha. The Civil Engineering Report identifies that two OSD systems would be required, with a volume of 1556m³ and 2488m³.

Rainwater harvesting is proposed for this development with re-use for non-potable applications. Internal uses include such applications as toilet flushing, while external applications will be used for irrigation. The aim is to reduce the water demand for the development by 50-70%, subject to detailed design. In general terms, the rainwater harvesting system will be an in-line tank for the collection and storage of rainwater. At times when the rainwater storage tank is full, rainwater can pass through the tank and continue to be discharged via gravity into the stormwater drainage system. Rainwater from the storage tank will be pumped for distribution throughout the development in a dedicated non-potable water reticulation system. This however would be subject to future detailed design.

Stormwater Quality

There is a need to provide a design which incorporates the principles of Water Sensitive Urban Design (WSUD) and to target pollutants that are present in the stormwater, to minimise the adverse impact these pollutants could have on receiving waters and to also meet the requirements specified by Council. As outlined within the CDCP 2021, the stormwater quality requirements are as follows:

- All anthropogenic materials with a minimum dimension >5mm: reduction of 90%
- Coarse sand and soil particles (<0.5mm diameter): reduction of 85%
- Total phosphorous & nitrogen: reduction of 60%
- Coarse sand and soil particles (<0.05mm diameter): reduction of 60%
- Free floating oils that do not emulsify aqueous solutions: reduction of 85%
- Anthropogenic hydrocarbons that can be emulsified: reduction of 90%

Developed impervious areas including roof, hardstand, car parking, roads and other extensive impervious areas are required to be treated by the Stormwater Treatment Measures (STM's). The STM's shall be sized according to the whole catchment area of the development. The STM's for the



development shall be based on a treatment train approach to ensure that all the objectives of the CDCP 2021 are met.

The proposed water quality treatment train has been modelled using the Model for Urban Stormwater Improvement Conceptualisation (MUSIC) to ensure that Council pollutant reduction targets are satisfactorily met by the proposed development. Water quality targets will be met through incorporation of the following treatment devices:

- Primary treatment to the parking, roof, and hardstand areas is to be performed via the provision of pit inserts to all grated pits;
- Tertiary treatment of the development will be made by draining the area into one of two combined OSD & Water Quality tanks with Ocean Protect StormFilter cartridges; and
- A portion of the roof will also be treated via rainwater reuse and settlement within the rainwater tank.

Stormwater During Construction

A preliminary Erosion and Sediment Control Plan (ESCP) and draft Soil and Water Management Plan (SWMP) have been prepared for the proposed construction works and are attached within the Civil Engineering Report (**Appendix 17**). While all construction activities have the potential to impact on water quality, the key activities are:

- Erosion and sediment control installation;
- Grading of existing earthworks to suit building layout, drainage layout and pavements;
- Stormwater and drainage works;
- Service installation works; and
- Building construction works.

Proposed controls for management of erosion and sedimentation during construction are outlined below:

- Sediment basins: Sediment basins have been sized and located to ensure sediment concentrations in site runoff are within acceptable limits;
- Sediment fences and diversion drains: Sediment fences and diversion drains would be located along the boundaries of the subject site to ensure no untreated runoff leaves the subject site. They would be located around the proposed stockpiles around the subject site; and
- Stabilised site access: For the proposal, stabilised site access is proposed at one located at the entry to the works area. This will limit the risk of sediment being transported onto Percival Road, Britton Street and other public roads.

Other management measures that will be employed are expected to include:

- Minimising the extent of disturbed areas across the site at any one time;
- Progressive stabilisation of disturbed areas or previously completed earthworks to suit the proposal once trimming works are complete; and
- Regular monitoring and implementation of remedial works to maintain the efficiency of all controls.

It is noted that the controls included in the preliminary ESCP are expected to be reviewed and updated as the design, staging and construction methodology is further developed for the proposed development.



6.1.14 Flooding Risk

The subject site is located within a flood planning area. The 1% AEP flood extent confirms that the development is affected by a minor overland flow path at the north-eastern corner. This is from Percival Road through to the Sydney Water pipeline corridor. The extent of flooding is observed over a Council trunk drainage line, which indicates that the pipeline has insufficient capacity and is resulting in minor upwelling in infrequent storm events. The overland flow path is noted to collect within the subject site's existing recessed dock, resulting in an elevated recorded flood depth in the subject site.

The overland flow path is indicated on Council's flooding maps, as depicted in **Figure 34** below.

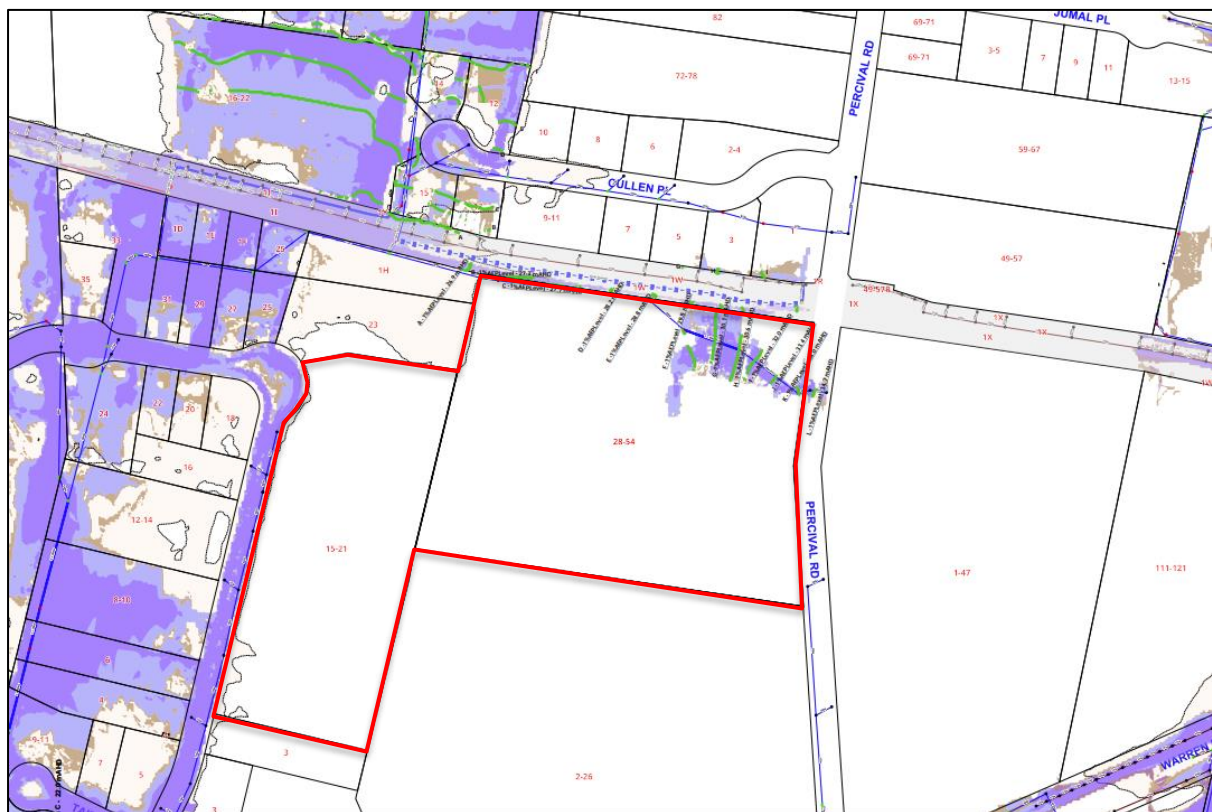


Figure 34. 1% AEP Flood Levels (Source: Cumberland Council, 2023)

6.1.14.1 Assessment of Impacts

A detailed TUFLOW hydrodynamic flood model has been completed for pre and post development flood events (including 20%, 5%, 1%, 0.2%, 0.5% AEP events and the Probable Maximum Flood (PMF) event).

Comparison of the 1% AEP storm events (for pre and post development) indicate that the proposed development would displace a portion of the overland flow path (identified in **Figure 34**). Additional drainage is provided to convey the remainder of the flows and there is not expected to be any upstream change to flood levels or velocity for any of the flow paths which enter the subject site or pass adjacent to the subject site.

A low-risk evacuation route is available from the subject site in both the 1% AEP and PMF events. Safe evacuation routes to the east and south-east of the subject site are available and occupants would be able to move to PMF free areas. It is considered that the emergency management strategy is compatible with the relevant NSW State Emergency Services requirements.



The 1% AEP flood levels in the overland flow path from Percival Street is noted to be RL34.50 at the site boundary. The overland flow path in Britton Street is noted to be RL 24.60m at the site's north-western point. The proposed building level is RL 33.75m along the Percival St frontage and RL 23.75m along the Britton St frontage. Portions of the structure are proposed to be floodproofed to the flood planning level to comply with Council requirements.

Overall, there is negligible effect on flood water local to the development as a result of the proposed development. The TUFLOW Modelling completed by Costin Roe Consulting confirms there is no affectation of upstream, downstream or adjoining properties.



Figure 35. 1% AEP Pre-development Flood Levels and Depths (Source: Costin Roe, 2024)

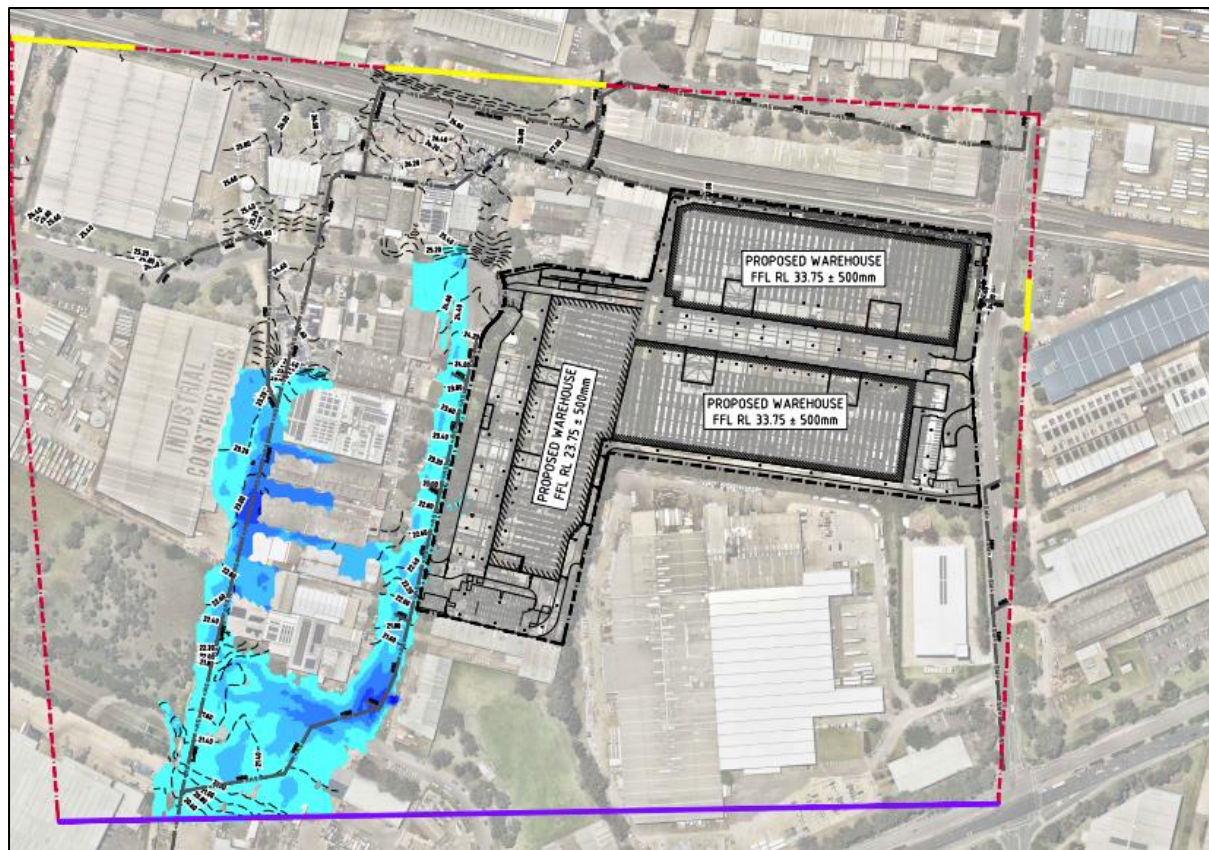


Figure 36. 1% AEP Post-development Flood Levels and Depths (Source: Costin Roe, 2024)

6.1.15 Hazards and Risks

An assessment of hazards and risks has been prepared by Riskcon Engineering for the proposed works and is attached as **Appendix 19**. The assessment concludes that as the facility is not classified as potentially hazardous or offensive, it is not necessary to prepare a Preliminary Risk Screening, as Chapter 3 of the *State Environmental Planning Policy (Resilience and Hazards) 2021* is not applicable to the proposal. A summary of Riskcon Engineering's assessment is provided below.

6.1.15.1 Assessment of Impacts

A review of the quantities of dangerous goods that may be stored at the proposed facility and the associated vehicle movements was conducted and compared to the threshold quantities outlined in *Applying SEPP 33*. The assessment was conducted both for individual tenancies and for a cumulative effect across the warehouse.

The results of the analysis indicate the threshold quantities for dangerous goods that may be stored and transported are not exceeded (at both the individual tenancy and cumulative levels); hence, Chapter 3 of the *State Environmental Planning Policy (Resilience and Hazards) 2021* is not applicable to the proposal. Furthermore, a review of the potential to cause offense was conducted which indicated the site operations would be unlikely to result in noise or odour to occur at levels which would cause offense.

6.1.15.2 Management and/or Mitigation Measures

The following recommendations are provided from the assessment:

- Any dangerous goods shall be stored in accordance with the Work Health and Safety Regulation 2017 and any documentation required by the Regulation shall be prepared prior to occupying the space with dangerous goods.



- Any prospective tenants which propose to store dangerous goods of any significant quantity should preferably be located within Warehouse A or B.

6.1.16 Contamination and Remediation

A DSI and RAP have been prepared by Senversa for the subject site and are attached as **Appendix 20** and **Appendix 21**.

6.1.16.1 Existing Environment

The findings of the DSI are outlined below:

- The subject site is made up of two allotments, formerly used for farming until, approximately, the 1960s when large warehouses were constructed periodically. The warehouses have been owned and leased by a range of food processing and packaging companies, laboratories, storage and distribution warehouses of a range of goods including dangerous goods.
- Two current environment protection licences (EPLs) are in use at the subject site, for Snackbrands for general agricultural processing of 30,000 to 100,000 tonnes annually and DGL Group for chemical storage greater than 100,000kL and recovery of hazardous and other waste specific to acidic solutions or acids in solid form.
- Soil chemical results did not indicate a significant potential health or ecological risk.
- A fragment of asbestos was observed on the ground surface of the microbial laboratory garden bed. It is likely that the fragment was from the building rather than the fill material. However, further evaluation of asbestos in fill is needed beneath current buildings following demolition. Asbestos was noted as present within the northern section of the microbial laboratory building.
- Acid sulfate soil is present in part of the western portion of Lot 34 DP617521 not currently proposed to be disturbed.
- Salinity and aggressivity results are considered 'non-aggressive' with respect to both concrete and steel pile exposure.
- Groundwater metal concentrations were considered to reflect urban background conditions. A concentration of perfluorooctane sulfonate (PFOS) in groundwater exceeded the 99% freshwater protection criterion; however, was below the 95% protection criterion. This contamination was delineated down gradient appears to be contained within the site and is therefore not considered to be significant.
- Significant concentrations of the ground gas methane were also found in vapour location SV48. Groundwater here appears to be contaminated with cooking oil, which may be degrading and giving rise to methane.
- Methane was recorded at 4.8% in the location of a former underground storage tank (UST), and this exceeded 1% v/v the action level.
- Other vapour results were below adopted criteria, with the exception of chloroform recorded in proximity of the microbial lab. This location will require further investigation. Chloroform was also detected above the site criterion in two locations at the northern portion of the Snackbrands property.
- Additional vapour investigations within the DGL warehouse are recommended given the detections of tetrachloroethylene (PCE) and 1,3-dichloropropane and elevated detections of volatile organic compounds (VOCs) in ambient air.

6.1.16.2 Remediation Action Plan

Contamination investigations to date did not identify the need for any remediation. However, some intrusive investigations were not able to be completed, due to the existing food manufacturing facility and potential contamination of food. The following data gaps have been identified, due to the access restrictions:

- Soil sampling in proximity of the pad mount substation within Lot 34 property for PCBs.



- Soil sampling below building footprints prior to redevelopment works including test pits to evaluate the presence of asbestos in fill.
- Reinstalling the vapour pin and collecting water sample instead of vapour sample from the flooded probe (SV48). The sample should be analysed for total oil and grease.
- Additional vapour sampling in the proximity to SV41 which recorded 4.8 % v/v methane, which exceeded the 1% v/v action level. The location appears to be in the vicinity of the former UST.
- Additional vapour sampling within the microbial laboratory building footprint to confirm the extend of the chloroform exceedance.
- Additional vapour sampling to the east and north of SV43 and SV47 to delineate the chloroform exceedances.
- Additional vapour investigations within the DGL warehouse near location SV33 may be warranted due to the detections of VOCs (PCE and 1,3-dichloropropane) and an elevated PID reading in ambient air.

A RAP has been prepared which identifies a framework to address the data gaps identified above. It is recommended that these are completed in stages. The vapour sampling is to be completed after the tenants have vacated the site whilst the hardstand remains in-situ. The soil sampling is to be completed following demolition of site structures and removal of hardstand from the site surface and prior to construction works.

The RAP outlines contingency remedial actions, validation, and workplace health and safety and environment management strategies associated with potential contamination sources identified. Subject to the suitable implementation of the measures described in the RAP, it is concluded that the subject site will be, or can be, made suitable for the development and that the risks to the environment can be appropriately protected during the works.

6.1.17 Waste Management

A Waste Management Plan has been prepared by Senversa and is attached as **Appendix 22**. The Waste Management Plan addresses the likely waste streams generated during the works, provides indicative estimations of waste quantities, and proposes reuse, recycling and disposal procedures during the demolition, excavation, construction and operational works of the redevelopment within the subject site. A summary is provided in the following sections.

6.1.17.1 Assessment of Impacts

Demolition and Construction Waste

Quantities of demolition and construction waste as a result of the proposed development are estimated in **TABLE 25** and **TABLE 26** below. The estimated quantities do not include waste produced as part of bulk earthworks.

TABLE 25: DEMOLITION WASTE QUANTITIES (m³)

Building Type	Area (m ²)	Concrete / Asphalt	Bricks	Timber / Gyprock	Metal	Other
Factory	38,100	17,069	7,811	152	876	686
Hardstand / Carpark	35,000	15,680	-	-	-	350

TABLE 26: CONSTRUCTION WASTE QUANTITIES (m³)

Building Type	Area (m ²)	Timber	Concrete	Bricks	Gyprock	Sand/soil	Metal	Other
Factory	88,700	22	187	147	40	427	53	44



A Hazardous Materials Survey has also been prepared by Senversa for the proposed works and is attached as **Appendix 23**. The Hazardous Materials Survey has identified a number of locations on the subject site that may comprise asbestos containing materials, and other hazardous materials. The removal of these materials must be undertaken in accordance with the recommendations outlined in **Appendix 23** and **Section 6.1.17.2** of this EIS.

Operational Waste

The potential waste types generated during operation are outlined below:

- Paper (including all types of recyclable paper, but excluding paper towels, toilet paper and tissues);
- Cardboard, excluding waxed cardboard;
- Metals (steel, aluminium, stainless steel, and copper piping or wire);
- Wood (timber, wooden pallets);
- Plastics (recyclables);
- Plastics (non-recyclables);
- Soft plastics;
- Green waste (grass clippings and tree pruning);
- Glass including bottles and containers;
- Light bulbs, batteries, e-waste; and
- General refuse such as food scraps and non-recyclable plastics.

TABLE 27 outlines the waste generation rates estimated for the proposed development in accordance with the CDCP 2021. Potential waste storage areas are outlined within the Waste Management Plan. The bins will likely be stored inside the warehouses and moved outside for collection.

TABLE 27: OPERATIONAL WASTE QUANTITIES			
Premises Type	Area of Space (m²)	Average Waste Generation	Average Recycling Generation
Warehouses	88,976	30L / per day / per 100m ²	30L / per day / per 100m ²
Offices	7,036	10L / per day / per 100m ²	10L / per day / per 100m ²
Café	71	660L / per day / per 100m ²	130L / per day / per 100m ²
Total Generation	-	195,000L / per week	193,000L / per week

6.1.17.2 Management and/or Mitigation Measures

Waste Management

Waste produced during demolition, construction and operation will be managed in line with the waste hierarchy and in accordance with relevant legislative requirements and guidelines in relation to waste

classification, handling, transport, reuse/recycling and/or disposal. Relevant measures are outlined in the Waste Management Plan.

Hazardous Materials

The Hazardous Materials Survey recommends the following management measures for the removal of hazardous materials:

1. **Asbestos Management:** Asbestos materials must be removed prior to demolition in accordance with Chapter 8 - Asbestos of the *Work Health and Safety Regulation NSW 2017 (NSW)* and the *Code of Practice: How to Safely Remove Asbestos* (SafeWork NSW, 2022).



2. **Asbestos Management:** Asbestos materials classified as being friable must be removed by a Class A licensed removal contractor and non-friable materials >10 sq m by a Class B licensed removal contractor.
3. **Synthetic Mineral Fibre (SMF) Removal:** SMF materials should be removed under controlled conditions prior to demolition or refurbishment works in accordance with the *National Code of Practice for the Safe Use of Synthetic Mineral Fibres* [NOHSC:2006(1990)].
4. **Polychlorinated Biphenyl (PCB) Management:** All capacitors containing PCBs must be managed in accordance with EPA's *Polychlorinated Biphenyl (PCB) Chemical Control Order 1997* and should be removed by a licensed electrical contractor prior to any demolition, refurbishment or decommissioning in accordance with the *Code of Practice for the safe handling of equipment containing Polychlorinated Biphenyl (PCB) Electrical Contractors' Association of Australia (1993)* and *Polychlorinated Biphenyls Management Plan, Revised Edition April 2003*.
5. **Lead Paint Management:** Removal is to be undertaken prior to any demolition or refurbishment in accordance with *AS/NZS 4361.2:2017 Guide to hazardous paint management, Part 2: Lead paint in residential, public and commercial buildings*. Disposal of waste contaminated with lead (including lead paint waste) should be undertaken according to *EPA Waste Classification Guidelines, Part 1 Classifying Waste (2014)*.
6. **Lead-containing Dust Management:** Lead-containing dust should be removed prior to demolition or refurbishment or other dust raising activities in accordance with *AS/NZS 4361.2:2017 Guide to hazardous paint management, Part 2: Lead paint in residential, public and commercial buildings*. Disposal of waste contaminated with lead (including lead paint waste) should be undertaken according to *EPA Waste Classification Guidelines, Part 1 Classifying Waste (2014)*.
7. **Ozone Depleting Substance Management:** Ozone depleting substances such as chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs) should be removed by a licensed contractor and taken to a licensed treatment facility for processing using Montreal Protocol approved technology and in accordance with the *Ozone Protection and Synthetic Greenhouse Gas Management Regulation 1995*.

6.1.18 Aboriginal Cultural Heritage

6.1.18.1 Existing Environment

A search of the Aboriginal Heritage Information Management System (AHIMS) database was undertaken on 7 February 2024 by Austral Archaeology. The results from the AHIMS search identified 89 previously recorded sites within a 3km radius of the subject site. The closest recorded site is a potential archaeological deposit, located approximately 668m southwest of the subject site (refer **Figure 37**). No AHIMS sites were identified within the subject site.

A visual inspection of the subject site was conducted by Austral Archaeology on 4 April 2024. The archaeological survey observed that the subject site was highly disturbed by the previous construction of warehouses, office buildings, and paved areas such as carparks, indicating significant disturbances to both the surface and subsurface contexts within the subject site. Both ground surface visibility (GSV) and exposure were extremely low, with limited landscaped green areas offering the most amount of GSV and exposure. No Aboriginal cultural material was identified during the survey.

No Aboriginal Cultural material, objects, or places were identified within proximity or within the subject site during the preparation of the ACHA.

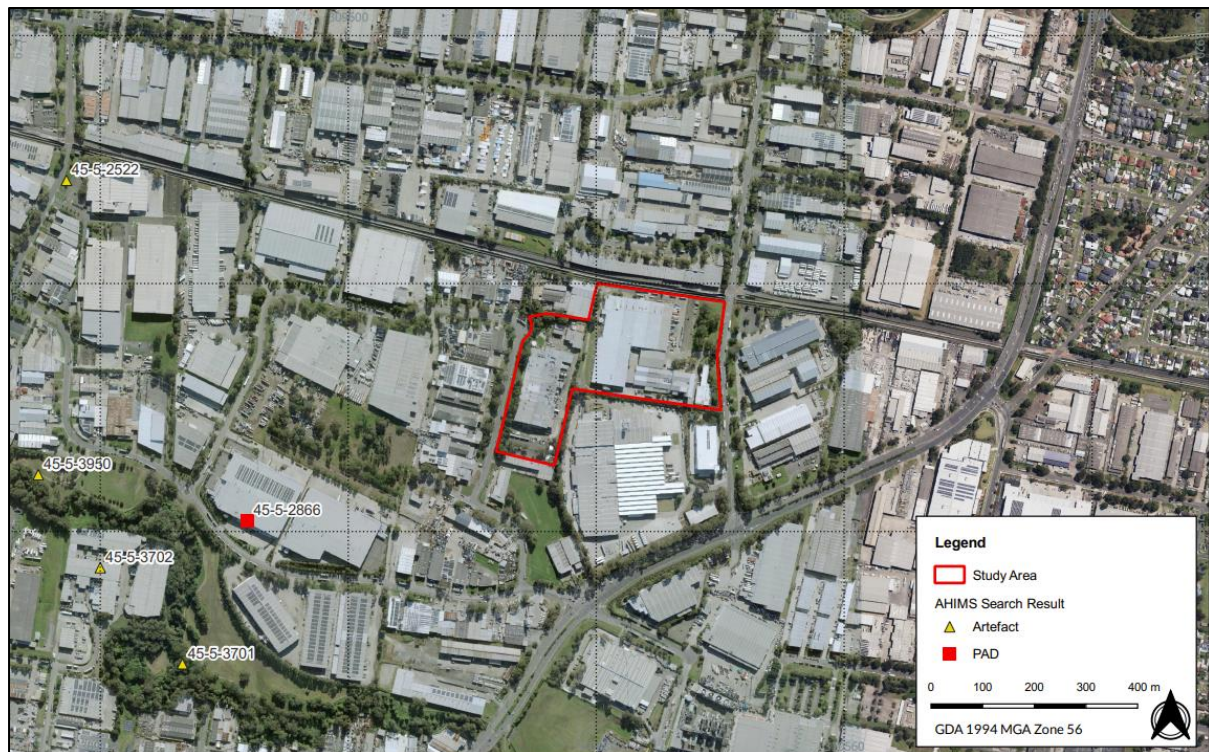


Figure 37. AHIMS Sites Within 1km of Subject Site (Source: Austral Archaeology, 2024)

6.1.18.2 Assessment of Impacts

The proposal will disturb and alter both surface and subsurface contexts within the study area, all of which has been subject to previous disturbance associated with the initial development and ongoing maintenance of the subject site. It has been concluded that the proposed activity will have no foreseeable impacts on Aboriginal objects, culturally modified trees, or declared Aboriginal places.

Consultation with Aboriginal stakeholders has been completed in accordance with the *Consultation Requirements (DECCW 2010a)*. A summary of the process and outcomes is provided in **TABLE 28**.

TABLE 28: ACHA CONSULTATION SUMMARY				
Stage	Component	Commenced	Completed	Summary
Stage 1	Letters to agencies	11/01/2024	N/A	In accordance with the Consultation Requirements the following bodies were notified as part of the project proposal: - Heritage NSW: Responded with a list of stakeholders who may have an interest in the proposed development. - DLALC: Did not respond. - Office of the Registrar, <i>Aboriginal Land Rights Act 1983</i>: Conducted a search which identified no Registered Aboriginal Owners for land within the study area. - Native Title Services Corporation Limited: Responded that there are no Native title claims.

ENVIRONMENTAL IMPACT STATEMENT

15 – 21 Britton Street, Smithfield
 Lot 1 DP 597082 and Lot 34 DP 617521

SSD-67368956

				▪ Cumberland City Council: Did not respond. ▪ The Greater Sydney Local Land Services (the relevant catchment management authority): Responded that they had no list of stakeholders who may have an interest in the proposed development.
	Registration of stakeholders	7/02/2024	21/02/2024	Letters were written to the Aboriginal stakeholders to provide opportunity to register interest in the project. The following groups registered their interest: ▪ Didge Ngunawal Ckan ▪ Konanggo Aboriginal Cultural Heritage Services ▪ Pearl Depoma ▪ Darug Custodian Aboriginal Corporation ▪ Yurrandaali ▪ Barraby Cultural Services ▪ Wailwan Aboriginal Group ▪ Waawaar Awaa ▪ Kamilaroi Yankuntjatjara Working Group ▪ Nattai Aboriginal Cultural & Heritage Consultation Services ▪ Yulay Cultural Services ▪ Widescope Indigenous Group ▪ A1 Indigenous Services ▪ Ngambaa Cultural Connections ▪ Murrabidgee Mullangari
	Public notice	17/02/2024	N/A	An advert was placed in the Daily Telegraph requesting the registration of individuals or organisations who hold cultural knowledge relevant to the project area.
Stage 2	Project information	23/02/2024	N/A	All registered Aboriginal stakeholders were provided with information outlining the proposed works, including information relating to proposed impacts as well as the project's methodology on 23 February 2024. No commentary was received from Aboriginal stakeholders at this stage of consultation.
Stage 3	Review of project methodology	23/02/2024	30/03/2024	The following four (4) responses were received from Aboriginal stakeholders during this stage:



				▪ “I have read and agree” – Arika Jalomaki, Yulay Cultural Service’s, 15 March 2024 ▪ “I endorse the recommendations made” - Darleen Johnson, Murrabidgee Mullangari, 8 March, 2024 ▪ “I do not have anything to add or have any suggestions for change” - Pearl Depoma, Pearl Depoma, 22 February 2024 ▪ “The study area is highly significant and sensitive to our people, I would like to agree and support your methodology to investigate further in the way of test excavations at Percival Street, Smithfield.” – Phil Khan, Kamilaroi Yankuntjatjara Working Group, 2 April 2024 During the fieldwork component of the project, it was also noted by Lana Wedgwood (Darug Custodian Aboriginal Corporation) that the entire study area is heavily disturbed and holds little archaeological potential.
Stage 4	Review of ACHA by Aboriginal stakeholders	23/04/2024	21/05/2024	One registered Aboriginal stakeholder (Pearl Depoma) provided a response to the draft ACHAR, stating there was no further comments to make.

6.1.18.3 Management and/or Mitigation Measures

The following recommendations are derived from the findings described in the ACHA. The recommendations have been developed from Austral Archaeology after considering the archaeological context, environmental information, consultation with the local Aboriginal community, and the findings of the predicted impact of the planning proposal on archaeological resources.

It is recommended that:

1. No further assessment or works are required to be undertaken for the subject site. If during the project, unexpected finds or human remains are discovered, recommendations outlined in (2) below shall be followed.
2. In the event that unexpected finds occur during any activity within the subject site, all works in the vicinity must cease immediately. The find must be left in place and protected from any further harm. Depending on the nature of the find, the following processes must be followed:
 - a. If, while undertaking the activity, an Aboriginal object is identified, it is a legal requirement under Section 89A of the NPW Act to notify Heritage NSW, as soon as possible. Further investigations and an AHIP may be required prior to certain activities recommencing.
 - b. If, human skeletal remains are encountered, all work must cease immediately and NSW Police must be contacted, they will then notify the Coroner’s Office. Following this, if the remains are believed to be of Aboriginal origin, then the Aboriginal stakeholders and Heritage NSW must be notified.



3. It is recommended that Lendlease continues to inform the Aboriginal stakeholders about the management of Aboriginal cultural heritage within the study area throughout the completion of the project. The consultation outlined as part of the ACHAR is valid for six months and must be maintained by the proponent for it to remain continuous. If a gap of more than six months occurs, then the consultation will not be suitable to support an AHIP for the project.
4. To preserve any potential archaeological resources, if present, all contractors undertaking earthworks in the study area should undergo an induction on identifying Aboriginal heritage sites and objects.
5. A copy of this report should be forwarded to all Aboriginal stakeholder groups who have registered an interest in the project.

6.1.19 Environmental Heritage

6.1.19.1 Existing Environment

A Statement of Heritage Impact (SoHI) has been prepared to assess the impact of the proposed development on the significance of any historic built values and is included at **Appendix 25**. The SoHI assesses the potential for direct or indirect impacts on items of heritage significance and confirms:

- The subject site is not listed on the State Heritage Register, or identified as an item of environmental heritage under the CLEP 2021;
- Directly adjoining the subject site to the north is an item on the State Heritage Register listed as "Pipehead, Water Supply Canal and Associated Works".

6.1.19.2 Assessment of Impacts

There are no identified items of heritage within the subject site. The pipeline located north of the subject site is part of the Upper Nepean Scheme which was critical water infrastructure constructed between the end of the 19th and start of the 20th centuries. This pipeline was an important component of the scheme and is largely intact. The area has been industrialised since the 1960s with significant infrastructure in the area such as roads, factories and facilities to support industrial uses. The proposed works are in-keeping with the existing uses and are part of the continued industrial use of the area. It is concluded that there is no likely impact on the adjoining heritage item from the proposed works.

Overall, the SOHI concludes that the proposed works are acceptable from a heritage perspective.

6.1.19.3 Management and/or Mitigation Measures

The following recommendations are derived from the findings described in the SOHI. It is concluded that the proposed works are acceptable from a heritage perspective, however to mitigate any potential impacts, it is recommended that:

1. If historical archaeological relics not assessed or anticipated by the SOHI are found during the undertaking of the works, all works in the immediate vicinity are to cease immediately and Heritage NSW be notified. A qualified archaeologist is to be contacted to assess the situation and consult with Heritage NSW regarding the most appropriate course of action.
2. Should the actual development be altered significantly from the proposed design, then a reassessment of the heritage/archaeological impact may be required. This includes any impacts not explicitly stated in Section 4 of the SOHI.
3. A copy of the SOHI should be lodged by the proponent in the local history section of the local library, and the library maintained by the Heritage NSW.



6.1.20 Social Impact

A Social Impact Assessment has been prepared by HillPDA for the proposed works and is attached as **Appendix 27**. A summary of this is provided in the following sections.

6.1.20.1 Assessment of Impacts

Social impacts resulting from the proposal during the construction phase are outlined in **TABLE 29** below, including relevant mitigation and management measures.

TABLE 29: SOCIAL IMPACTS DURING CONSTRUCTION PHASE			
Potential Impacts	Standard Measures	Project-specific Mitigation	Residual Impact Significance
Noise and vibration Noise and vibration from construction activity may negatively affect amenity for residents, workers and businesses surrounding the site, impacting upon quiet enjoyment of surroundings, way of life and health and wellbeing. This impact is most likely to affect workers at neighbouring businesses.	▪ When planning construction work that will generate significant noise or vibration, consider: ○ Substitution by an alternative process. ○ Restricting times when work is carried out. ○ Screening or enclosures. ▪ Utilisation of temporary supports where deemed necessary. ▪ Carry out demolition activity in accordance with the approved work hours.	Implement the recommended mitigation measures from the Noise Impact Assessment.	Unlikely + Minor = Low
Vehicle movements and access ▪ Additional construction vehicle movements may increase congestion on surrounding roads, impacting way of life, access and livelihoods for surrounding residents, workers, and businesses. ▪ Impacts to surrounding businesses and pedestrians from changed access during construction, potentially affecting livelihoods and way of life. ▪ Potential changes to access for surrounding businesses and residences from	▪ Manage access to/from adjacent properties. ▪ Restrict construction vehicle movements to designated routes to/from the site. ▪ Manage and control construction vehicle activity in the vicinity of the site. ▪ Provide an appropriate and convenient environment for pedestrians and minimise the impact on pedestrian movements. ▪ Maintain appropriate capacity for pedestrians at all times on footpaths adjacent to the site.	▪ Encourage the use of public transport for workers. ▪ Notify neighbouring residents, businesses, and any other potentially impacted premises of any changes to access. ▪ Implementation of measures identified in the preliminary CTMP. A detailed CTMP would be prepared prior to construction works commencing.	Unlikely + Minor = Low



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parking for workers on site during construction, impacting way of life and access.	▪ Maintain appropriate public transport access. ▪ Carry out demolition activity in accordance with the approved work hours. ▪ Ensure dedicated parking is provided for workers, or that they are encouraged to travel via alternative means (e.g. public transport, shuttle to external parking site).		
Air Quality Dust from construction activity could cause a decline in air quality, potentially impacting the amenity of surroundings and health and wellbeing of neighbouring residents and workers. Release of hazardous building materials could potentially impact the health and wellbeing of neighbouring residents and workers.	Construction phase air quality impacts shall be minimised or avoided by incorporation of appropriate dust suppression and air quality control measures at various stages of the project.	Implementation of measures identified as part of the preliminary CTMP and the AQIA.	Unlikely + Minor = Low
Tree clearing Clearing of trees on the site required to facilitate the construction of the proposed development would temporarily reduce the quantity of natural environment features in the surroundings of the site, reducing aesthetic value and amenity.	Retain street trees where possible	Implementation of the mitigation and management measures as identified in the AIA.	Almost certain + minimal = Low
Employment Additional employment opportunities on site arising from construction activity (direct and indirect) positively impacting livelihoods	Construction activity will draw resources from surrounding areas and thereby generate economic activity in the Fairfield LGA as well as outside the LGA.	Construction of the proposal would yield an EDC of \$440,630,000 and would generate approximately 1,429 jobs during construction.	Almost certain + major = Very high (positive)
Culture and Heritage Potential impact on community and culture through fear of impacts to Aboriginal cultural heritage sites during construction. Potential impact on local cultural values through	▪ Engagement with Local Aboriginal Land Council ▪ Implementation of an unexpected finds protocol.	Implementation of recommendations identified in the ACHAR.	Unlikely + Minor = Low



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fear of impacts to historical cultural heritage sites during construction.			
Community Potential feeling of powerlessness or lack of means to have input or say on the proposal during construction for surrounding properties and the wide community, negatively impacting decision-making systems	Standard engagement mechanisms as part of SSDA process.	Implementation of a construction stakeholder communications plan.	Unlikely + Minor = Low

Social impacts resulting from the proposal during the operation phase are outlined in **TABLE 30** below, including relevant mitigation and management measures.

TABLE 30: SOCIAL IMPACTS DURING OPERATION PHASE

Potential Impacts	Standard Measures	Project-specific Mitigation	Residual Impact Significance
Noise Noise emissions from the operation of the warehouse and distribution facility could potentially impact residents, workers and businesses (on site and surrounding) way of life, health and wellbeing, and enjoyment of surroundings	- Locating mechanical equipment as far as practicable from noise sensitive receivers. - Using in-duct treatments such as internally lined ductwork or silencers. - Building barriers or enclosures around equipment.	An operational noise assessment was conducted and indicated that no exceedances to the relevant criteria are predicted.	Unlikely + Minor = Low
Parking Impact to surrounding parking availability from on-site uses, impacting accessibility and way of life for surrounding residents, workers and visitors, and livelihoods for nearby businesses who rely on existing parking.	- Parking is to be constructed in line with relevant requirements for the uses on site. - Information regarding public transport options is to be made available for workers on site.	The provision of 482 carparking spaces is compliant with the carparking spaces required by the CDCP 2021.	Unlikely + Minor = Low
Air Quality Dust from on-site activity could cause a decline in air quality, potentially impacting the amenity of surroundings and health and wellbeing of neighbouring residents and workers.	Air quality impacts shall be minimised or avoided by incorporation of appropriate dust suppression and air quality control measures at various stages of the project.	Implementation of measures identified as part of the preliminary CTMP and the AQIA.	Unlikely + Minor = Low



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Amenity - Increased provision of landscaping and tree plantings on site (along the street frontages and in setbacks), positively impacting surroundings through amenity, aesthetic, and natural environment improvements. - Increased intensity of development at the site could improve passive surveillance in the area, increasing safety. - Potential impacts to the surroundings (and community) for local residents through visual impacts and changes to visual amenity associated with the proposed development.	- Ensure retention of existing trees on site where possible - Maximise opportunities to contribute to landscape setting and urban tree canopy through plantings and landscaping.	Implementation of the mitigation measures as outlined in the VIA.	Likely + Minor = Medium
Employment Additional employment opportunities on site arising from operational activity (direct and indirect), positively impacting livelihoods (and way of life) in the study area and beyond.	None (positive)	It is estimated that the entire project has a forecast perceived employment contribution throughout the community of 1,025 jobs per year (production induced effects).	Likely + Moderate = High (positive)
Community Potential feeling of powerlessness or lack of means to have input or say during operations, negatively impacting decision making systems.	N/A	A Plan of Operation and Management (POM) should identify a transparent process for resolving complaints by neighbours and community members. This process should be transparent, with clear timeframes for resolution of matters, as well as a clear system tenant management where tenants are breaching the agreed code of conduct.	Unlikely + Minor = Low

In summary, the proposal is expected to have the greatest negative impact during the construction phase, which will be temporary and limited to the subject site's immediate surroundings. The proposal may have impacts on visual, noise, and air quality amenity during construction and operation. However, these impacts are expected to be managed through the application of appropriate mitigation measures. The proposed development may also impact on the health and wellbeing of surrounding residents due to changes in noise, vibration, and air quality levels. These impacts may be mitigated by adopting the suggestion of relevant specialist reports. It is



acknowledged that there are a limited number of sensitive receivers in the vicinity of the site, largely due to the site's location within an industrial area.

The proposed development was found to have positive social impacts through the creation of employment opportunities. It has been estimated that the proposal would generate approximately 1,428 construction jobs and 1,025 operation jobs, providing positive benefits to livelihoods across the region.

Overall, it has been determined that the proposal would have positive social impacts, whilst potential negative social impacts of the proposal can be managed through the implementation of appropriate mitigation measures. With consideration of the above potential impacts and benefits, the SIA concludes that the proposal would produce an overall benefit to the local social environment.

6.1.21 Infrastructure Requirements and Utilities

6.1.21.1 Existing Environment

The existing infrastructure at the subject site is documented within **TABLE 31** and outlined in detail in the Infrastructure, Delivery, Management and Staging Plan attached as **Appendix 18**.

6.1.21.2 Assessment of Impacts

The following table provides an overview of the servicing requirements of the proposed development and any identified impacts to existing infrastructure.

TABLE 31: INFRASTRUCTURE REQUIREMENTS	
Infrastructure service	Assessment
Potable water	The current warehouse located on Britton Street is a manufacturing facility (Snack Brands Pty Ltd) and utilises a significant amount of water in its manufacturing processes. Reviewing the Sydney Water information from this property, average daily water use (over the period September 2023 to April 2024) was 591kl/day. The potable water demand for the proposed development is estimated at 44kl/day which is significantly less. There is an existing 150mm water main laid on the eastern side of Britton Street which services the subject site. Sydney Water has confirmed that adequate service is available from this water main to service the proposed development and there is reasonable flow and adequate pressure.
Wastewater	Sydney Water has raised the issue of constraints within parts of the Fairfield Smithfield sewer catchment. Review of Sydney Water records indicate that current discharge from the existing development averages 604kl/day, due to the operations of the Snack Brands facility which utilises a large potable water demand and associated wastewater discharges. Therefore, performance of the system will not be affected by the proposed development as the estimates discharge of wastewater is 38.3kl/day (a reduction of 566kl/day). Sydney Water note that the existing network (i.e., the existing 225mm sewer within the site and downstream infrastructure) has capacity for ADWF from the proposed development.
Electricity	Substantial electrical reticulation exists in Britton Street and Percival Road. High voltage overhead and underground electrical systems service the subject site. Ten existing padmount substations are located within the subject site with a combined capacity of approximately



	10MVA. Due to the location of the proposed building footprints, a number of these padmount substations will be decommissioned and removed from the subject site. New padmount substations will be installed within the subject site appropriately located due to the proposed development. Estimated demand for the proposed development is assessed at 2.7MVA. Endeavour Energy has confirmed that capacity exists to service the proposed development.
Gas	The subject site is adequately serviced by an existing 1,050kPa high pressure gas reticulation laid in Britton Street and Percival Road. Currently both of the existing properties are connected to these gas mains. However, due to the intended use of the proposed development as a warehouse and distribution centre, it is unlikely that gas reticulation would be required to service the proposed development.
Telecommunications	The existing buildings on the subject site are serviced by fibre optic cable system. During demolition these cables will be terminated, and new cables will be installed from the existing reticulation system to service the proposed development. The proposed development can be adequately serviced by the surrounding fibre optic system.

Overall, it is expected that the proposed development can be adequately serviced by infrastructure and no off-site upgrades are anticipated.

6.1.21.3 Infrastructure Delivery Strategy

It is understood that infrastructure works will be completed under a single stage construction methodology. The disconnection and removal of the existing services will be undertaken during demolition. It is noted that this delivery strategy is provisional only and will be finalised at a later stage based on discussions with the head contractor.

6.1.22 Bush Fire Risk

The subject site is not identified as bushfire prone land, nor within the vicinity of bushfire prone land. As such, no further assessment is required.

6.1.23 Construction, Operation and Staging

Details of construction, operation and staging are outlined in **Section 3.3** of this EIS.

6.1.24 Contributions and Public Benefit

Pursuant to the *Cumberland Local Infrastructure Contributions Plan 2020*, the proposed development will be levied infrastructure contributions at a rate of 1% of the development cost. Based on the EDC of \$440,630,000, a total infrastructure contribution of \$4,406,300 would be payable.

Pursuant to the *Environmental Planning and Assessment (Housing and Productivity Contribution) Order 2023*, industrial development is levied at \$15 per square metre of GFA and commercial development is levied at \$30 per square metre of GFA. It is acknowledged that these costs are indexed per quarter and would be charged once development consent is granted by the consent authority.

The proposed GFA is as follows:

- 96,497m² of industrial GFA



- 71m² of commercial GFA

It is acknowledged that the contributions relate to new GFA, and therefore the existing development on the subject site will receive a credit.

It is noted that the definition of “commercial development” under the *Environmental Planning and Assessment (Housing and Productivity Contribution) Order 2023* includes food and drink premises.

6.1.25 Engagement

A detailed engagement plan was developed in consultation with the proponent and in line with the NSW's *Undertaking Engagement Guidelines for State Significant Projects*. This is attached as **Appendix 28** and summarised in **PART 5** and **Appendix C** of this EIS.

6.2 CUMULATIVE ASSESSMENT

6.2.1 Cumulative Visual Analysis

The sensitivity of the landscape on average has been assessed within the baseline to be low. From understanding the development proposals, mitigation and the existing industrial character of adjacent landscape, the magnitude of change is judged to be high at some viewpoints. There will be some impact to the existing site character, but the introduction of this development typology is not uncharacteristic of the context in which it will sit. The significance of impact therefore is judged to be minor.

6.2.2 Cumulative Traffic Analysis

Additional traffic arising from the proposed development has been assessed at **Section 6.1.6** of this EIS.

The TAIA identifies two state significant development planned in the vicinity of the subject site. The traffic impacts of these developments have been incorporated into the SIDRA intersection analysis as described in **Section 6.1.6** of this EIS. This confirms that the proposed development is expected to have a minor impact on the surrounding road network during peak periods.

6.2.3 Cumulative Noise and Vibration Analysis

Given the distance and the proximity of major roadways, operational noise from the proposed warehouse and distribution centre will be inaudible above the prevailing ambient noise at all surrounding residential receivers. Additionally, operational noise emissions to surrounding industrial sites will achieve relevant noise criteria.

Consideration has also been given to the additional traffic generated by the proposal and the potential cumulative impacts resulting from increased traffic. The NVIA indicated that the increase in noise levels due to the additional traffic generated by the proposal is considered as barely perceptible to the average person and is unlikely to result in any adverse impacts on residential receivers.

6.2.4 Cumulative Air Quality Analysis

Dispersion modelling was carried out for the operational phase of the proposed development. No additional exceedances of the criteria are predicted to occur as a result of the proposed operations and are not anticipated to significantly exacerbate existing elevated background concentrations. Therefore, operation of the proposed development is not expected to adversely affect sensitive receptors.



With the proposal only involving warehousing and distribution activities and commercial activities, the operations are not considered to contribute to the cumulative emissions for the area.

6.2.5 Cumulative Hazard Analysis

The surrounding area contains multiple warehouses and industrial facilities which may store dangerous goods. Therefore, should the development be approved it is necessary to consider the impacts of what may be in the surrounding area.

What is stored in the surrounding warehouses are not known; however, it is possible to review the potential impacts of the development to determine whether this may result in an unacceptable accumulation within the surrounding area.

The quantities of goods proposed to be stored are all for ancillary use and would be considered minor storages under the dangerous goods standards which govern the storage and handling of these products. Minor storages are considered to pose minimal risk to on and offsite uses. Furthermore, the quantities stored in each tenancy and cumulatively are well below the thresholds within *Applying SEPP 33*. Therefore, it would be considered that the potential for offsite impact, such that the risks overlap with the surrounding areas would be negligible. Therefore, the cumulative risk posed by the development is considered to not exceed the acceptable thresholds and thus Chapter 3 of *State Environmental Planning Policy (Resilience and Hazards) 2021* does not apply, and no further assessment is required.

6.3 PLANNED MANAGEMENT AND MITIGATION MEASURES

Lendlease plans to undertake the construction and operation of the proposed warehouse and distribution centre, in accordance with the planned management and mitigation measures outlined within **Appendix E** of this EIS.



PART 7 JUSTIFICATION OF THE PROJECT

7.1 JUSTIFICATION

The proposed development is justified on environmental, social and economic grounds and is compatible with the locality in which it is proposed. The proposed development would enhance the subject site from an otherwise vacant landholding to a productive employment generating facility.

This EIS is submitted on the following basis.

7.1.1 Supports State, Regional and Local Planning Objectives

The proposed development is consistent with the objectives, provisions and vision contained within *A Metropolis of Three Cities – Greater Sydney Region Plan*; the *Central City District Plan*; the *Cumberland 2030: Our Local Strategy Planning Statement*; the *Cumberland Employment and Innovation Lands Strategy 2019*; and the *Future Transport Strategy 2056*. The proposal would contribute to employment generation in an area already earmarked for employment through both State and Regional planning policies.

The subject site forms part of the Smithfield Industrial area, which is identified within the Central City District Plan and the Cumberland Planning Statement as being important industrial employment land. It is noted that Cumberland has a large proportion of industrial land, given its proximity to Greater Parramatta and access to transport and freight routes. The subject site is strategically placed to provide industrial services that support the economic growth of the Central City District.

The proposed development aligns with the priorities of the strategic planning documents, as it seeks to redevelop an otherwise dated and rundown industrial site. It will maximise the development opportunities at the subject site, through developing a multi-level warehousing estate, with ancillary uses that will generate employment opportunities. Multi-level industrial developments are an emerging land use, that provide a solution to the increasing shortage of available industrial land across the Greater Sydney region.

7.1.2 Demonstrates an Appropriate Use of a Permissible Development

The proposed development would retain and contribute to the growth of new industry for the immediate locale and the wider region. The proposed development would be a highly appropriate and compatible (given its contiguousness to other existing warehousing and industrial developments), response to the strategic goals and objectives of the whole region as set out in the strategic planning documents, which all envisage employment-generating, industrial land uses at this location.

The permissibility of the subject site for development as a warehouse and distribution centre (including ancillary uses) is prescribed by the CLEP 2021, which describes such development as permitted with consent in the E4 zone.

The suitability of the subject site with regard to the proposed development, can be attributed to its ready ability to provide employment, its excellent access arrangements, its suitable contextual setting, and its minimal impact on the environment.

7.1.3 Minimises Environmental Impacts

Specialist consultants have assessed the potential impacts of the proposed development, determining that it could be undertaken with minimal environmental impacts. The commissioned reports have collectively concluded that no significant risk to the locality would result from the proposed development. Where impacts have been identified, these fully-developed strategies are set



out in detail for management and mitigation. These measures are described in **PART 6** and **Appendix E** of this EIS.

7.1.4 Creates Compatibility with Surrounding Development

The proposed development is compatible with existing land uses on adjacent lands, all of which provide very similar industrial functions. All are within the immediate vicinity of the proposed development. Detailed investigations undertaken, as part of this application, conclude that no significant environmental cumulative impacts, would occur from the proposed facility.

7.1.5 Delivers Ecologically Sustainable Development

The principles of ESD as outlined in Clause 193 of the EP&A Regulation have been carefully considered in the formulation of this proposal and are addressed as follows:

7.1.5.1 Precautionary Principle

Through the implementation of environmental management and an assessment of the building's operational maintainability, the proposed development attempts to incorporate adaptability and resilience into the project design. The concept behind the precautionary principle is to create spaces that can both; accommodate for changes, which may eventuate in the future, and avoid the risk of serious or irreversible damage to the environment.

After careful assessment by both the project team and expert consultants, it is concluded that no unmanageable threat or irreversible damage to the environment, would result from the proposed development.

7.1.5.2 Inter-generational Equity

The project team and expert consultants have examined the overall effects of the proposed development, on both the natural environment and the existing built environment within the vicinity of the subject site.

Through the inclusion of aspects such as: solar panels; rainwater tanks for rainwater harvesting and re-use for landscape irrigation and toilet flushing; waste minimisation and recycling; inclusion of electric vehicle charging stations, bicycle parking and end of trip facilities; and high performance glazing; the project demonstrates a strong commitment to the preservation of environmental health, diversity and productivity of the local area.

This detailed assessment has concluded that no unreasonable use of resources, affectation of environmental processes or prevention of the use of land for future generations would occur from the proposed development. The proposed development would improve the status of the subject site and contribute to the economies of the region through both substantial investment and new employment, thereby improving the inter-generational equity.

7.1.5.3 Conservation of Biological Diversity and Ecological Integrity

Through the planting of native vegetation, improvement of stormwater runoff from the subject site and use of integrated landscaping, the proposed development will act to improve, conserve and support the local biological diversity and integrity.

The proposed development will ensure any direct and indirect impacts on biodiversity are avoided, minimised and mitigated through the implementation of relevant best management practices and subject to the proposed development's consent conditions.



7.1.5.4 Improved Valuation, Pricing and Incentive Mechanisms

The proposed development would enable operational efficiencies for the end user, through the provision of tailored design outcomes.

Multi-level industrial developments are an emerging land use, that provide a solution to the increasing shortage of available industrial land across the Greater Sydney region.

7.1.5.5 Environmental Management

The proposed development implements significant and elaborate measures that avoid, contain and address any possible air quality, noise, waste and pollution impacts, through avoidance, better design and management. This is exemplified through the measures, which would be implemented throughout both the construction and operational phases of the proposed development, outlined within **PART 6** of this EIS.



APPENDIX A

SEARS TABLE



SEARS TABLE

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HOW THE SEARS HAVE BEEN SATISFIED	
Issue and Assessment Requirements	Satisfied by
1. Statutory and strategic context	
Address all relevant legislation, environmental planning instruments (EPIs) (including drafts), plans, policies and guidelines.	Refer to PART 4 and Appendix C of this EIS.
Identify compliance with applicable development standards and provide a detailed justification for any non-compliances.	Refer to Appendix C of this EIS.
Provide an explanation of how the development as described in the EIS is consistent with the development as was described in the request for SEARs (including any components that were not SSD) and provide a justification for any differences.	Refer to Section 6.1.1 .
Address the requirements of any approvals applying to the site, including any concept approval or recommendation from any Gateway determination.	Refer to Section 2.3 of this EIS.
2. Capital Investment Value and Employment	
Provide a detailed calculation of the capital investment value (CIV) of the development, prepared by a AIQS Certified Quantity Surveyor or RICS Chartered Quantity Surveyor in accordance with <i>Planning Circular PS 21-020: Calculation of Capital Investment Value</i>. The calculation of the estimated CIV is to be accurate at the date of application and include details of all components and assumptions from which it is derived.	Refer to Section 1.5 and Appendix 2 of this EIS.
Provide an estimate of the retained and new jobs that would be created during the construction and operational phases of the development, including details of the methodology to determine the figures provided.	Refer to Section 1.6 and Appendix 2 of this EIS.
3. Design Quality	
- Demonstrate how the development will achieve: - design excellence in accordance with any applicable EPI provisions. - good design in accordance with the seven objectives for good design in <i>Better Placed</i>.	Refer to Section 6.1.3 and Appendix 5 of this EIS.
Where required by an EPI or concept approval, demonstrate that the development has been subject to a competitive design process, or reviewed by the State Design Review Panel (SDRP) consistent with the <i>NSW SDRP: Guidelines for Project Teams</i>. Recommendations are to be addressed prior to lodgement.	N/A – the proposal is subject to a competitive design process, nor is it to be reviewed by the SDRP.
4. Built Form and Urban Design	
Explain and illustrate the proposed built form, including a detailed site and context analysis to justify the proposed site planning and design approach.	Refer to Section 6.1.46.1.4 and Appendix 4 , Appendix 5 and Appendix 6 of this EIS.
Demonstrate how the proposed built form (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses and responds to the context, site characteristics, streetscape and existing and future character of the locality.	Refer to Section 6.1.4 and Appendix 4 and Appendix 5 of this EIS.



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Demonstrate how the building design will deliver a high-quality development, including consideration of façade design, articulation, materials, finishes, colours, any signage and integration of services.	Refer to Section 6.1.4 and Appendix 4 and Appendix 5 of this EIS.
Assess how the development complies with the relevant accessibility requirements.	Refer to Section 6.1.4 and Appendix 7 and Appendix 8 of this EIS.
5. Visual Impact	
Provide a visual analysis of the development from key viewpoints, including photomontages or perspectives showing the proposed and likely future development.	Refer to Section 6.1.5 and Appendix 9 of this EIS.
Where the visual analysis has identified potential for significant visual impact, provide a visual impact assessment that addresses the impacts of the development on the existing catchment.	Refer to Section 6.1.5 and Appendix 9 of this EIS.
6. Traffic, Transport and Accessibility	
- Provide a transport and accessibility impact assessment, which includes: - details of all traffic types and volumes likely to be generated during construction and operation, including a description of key access and haul routes. - an assessment of the predicted impacts of this traffic on road safety and the capacity of the road network, including consideration of cumulative traffic impacts on existing performance levels of nearby intersections (using industry standard modelling). - plans demonstrating how all vehicles likely to be generated during construction and operation and awaiting loading, unloading or servicing can be accommodated on the site to avoid queuing in the street network. - details and plans of any proposed internal road network, loading dock provision and servicing, on-site parking provisions, and sufficient pedestrian and cyclist facilities, in accordance with the relevant Australian Standards. - swept path analysis for the largest vehicle requiring access to the development. - details of road upgrades, infrastructure works, or new roads or access points required for the development if necessary.	Refer to Section 6.1.6 and Appendix 10 of this EIS.
Provide a Construction Traffic Management Plan detailing predicted construction vehicle, routes, access and parking arrangements, coordination with other construction occurring in the area, and how impacts on existing traffic, pedestrian and bicycle networks would be managed and mitigated.	Refer to Section 6.1.6 and Appendix 10 of this EIS.
7. Trees and Landscaping	
- Provide a detailed site-wide landscape plan, that: - identifies the number and location of trees to be removed and retained, and how opportunities to	Refer to Section 6.1.7 and Appendix 11 of this EIS.



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retain significant trees have been explored and/or informs the plan. – details the proposed site planting, including location, number and species of plantings, heights of trees at maturity and proposed canopy coverage (as a percentage of the site area). – demonstrates how the proposed development would: - o contribute to long term landscape setting in respect of the site and streetscape. - o mitigate the urban heat island effect and ensure appropriate comfort levels on-site. - o contribute to the objective of increased urban tree canopy cover. - o maximise opportunities for green infrastructure, consistent with <i>Greener Places</i> and having regard to any bush fire risk.	
8. Ecologically Sustainable Development (ESD)	
▪ Identify how ESD principles (as defined in section 193 of the EP&A Regulation) are incorporated in the design and ongoing operation of the development.	Refer to Section 6.1.8 and Appendix 12 of this EIS.
▪ Demonstrate how the development will meet or exceed the relevant industry recognised building sustainability and environmental performance standards.	Refer to Section 6.1.8 and Appendix 12 of this EIS.
▪ Demonstrate how the development minimises greenhouse gas emissions (reflecting the Government's goal of net zero emissions by 2050) and consumption of energy, water (including water sensitive urban design) and material resources.	Refer to Section 6.1.8 and Appendix 12 of this EIS.
▪ If Chapter 3 of SEPP (Sustainable Buildings) 2022 applies: – demonstrate how the development has been designed to address the provisions set out in in Chapter 3.2(1). – provide a NABERS Embodied Emissions Material Form to disclose the amount of embodied emissions attributable to the development in accordance with section 35B of the EP&A Regulation.	Refer to Section 6.1.8, Appendix 12, Appendix 31, Appendix 32 and Appendix 33 of this EIS.
9. Biodiversity	
▪ Assess any biodiversity impacts associated with the development in accordance with the <i>Biodiversity Conservation Act 2016</i> and the <i>Biodiversity Assessment Method 2020</i>, including the preparation of a Biodiversity Development Assessment Report (BDAR), unless a waiver is granted, or the site is on biodiversity certified land.	Refer to Section 6.1.9 and Appendix 13 of this EIS.
▪ If the development is on biodiversity certified land, provide information to identify the site (using associated mapping) and demonstrate the proposed development is consistent with the relevant biodiversity measure conferred by the biodiversity certification.	N/A – the subject site is not biodiversity certified land.
10. Air Quality	
▪ Identify significant air emission sources at the proposed development (during construction and operation), assess their potential to cause adverse off-site impacts, and detail	Refer to Section 6.1.10 and Appendix 14 of this EIS.



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proposed management and mitigation measures that would be implemented. Where air emissions during operation have the potential to cause adverse off-site impacts, provide a quantitative air quality impact assessment prepared in accordance with the relevant NSW Environment Protection Authority (EPA) guidelines.	
11. Noise and Vibration	
Provide a noise and vibration assessment prepared in accordance with the relevant EPA guidelines. The assessment must detail construction and operational noise and vibration impacts on nearby sensitive receivers and structures and outline the proposed management and mitigation measures that would be implemented.	Refer to Section 6.1.11 and Appendix 15 of this EIS.
12. Ground and Water Conditions	
Assess potential impacts on soil resources and related infrastructure and riparian lands on and near the site, including soil erosion, salinity and acid sulfate soils.	Refer to Section 6.1.12 of this EIS.
- Provide a Surface and Groundwater Impact Assessment that assesses potential impacts on: - surface water resources (quality and quantity) including related infrastructure, hydrology, dependent ecosystems, drainage lines, downstream assets and watercourses. - groundwater resources in accordance with the Groundwater Guidelines.	Refer to Section 6.1.12, Appendix 16 and Appendix 17 of this EIS.
13. Water Management	
- Provide an Integrated Water Management Plan for the development that: - is prepared in consultation with the local council and any other relevant drainage or water authority. - outlines the water-related servicing infrastructure required by the development (informed by the anticipated annual and ultimate increase in servicing demand) and evaluates opportunities to reduce water demand (such as recycled water provision). - details the proposed drainage design (stormwater and wastewater) for the site including any on-site detention facilities, water quality management measures and nominated discharge points, on-site sewage management, and measures to treat, reuse or dispose of water. - demonstrates compliance with the local council or other drainage or water authority requirements and avoids adverse downstream impacts.	Refer to Section 6.1.13 and Appendix 17 of this EIS.
Where water and drainage infrastructure works are required that would be handed over to the local council, or other drainage or water authority, provide full hydraulic details and detailed plans and specification of proposed works that have been prepared in consultation with, and comply with the relevant standards of, the local council or other drainage or water authority.	Refer to Section 6.1.13 and Appendix 17 of this EIS.
14. Flooding risk	



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Identify any flood risk on-site having regard to adopted flood studies, the potential effects of climate change, and any relevant provisions of the <i>NSW Floodplain Development Manual</i>.	Refer to Section 6.1.14 and Appendix 17 of this EIS.
Assess the impacts of the development, including any changes to flood risk on-site or off-site, and detail design solutions and operational procedures to mitigate flood risk where required.	Refer to Section 6.1.14 and Appendix 17 of this EIS.
15. Hazards and Risks	
Where there are dangerous goods and hazardous materials associated with the development provide a preliminary risk screening in accordance with Chapter 3 of SEPP (Resilience and Hazards) 2021.	Refer to Section 6.1.15 and Appendix 19 of this EIS.
Where required by SEPP (Resilience and Hazards) 2021, provide a Preliminary Hazard Analysis prepared in accordance with <i>Hazardous Industry Planning Advisory Paper No.6 – Guidelines for Hazard Analysis</i>.	N/A
If the development is adjacent to or on land in a pipeline corridor, report on consultation outcomes with the operator of the pipeline, and prepare a hazard analysis.	N/A
16. Contamination and Remediation	
In accordance with <i>Chapter 4 of SEPP (Resilience and Hazards) 2021</i>, assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable (or will be suitable, after remediation) for the development.	Refer to Section 6.1.16 , Appendix 20 and Appendix 21 of this EIS.
17. Waste Management	
Identify, quantify and classify the likely waste streams to be generated during construction and operation.	Refer to Section 6.1.17 and Appendix 22Appendix 21 of this EIS.
Provide the measures to be implemented to manage, reuse, recycle and safely dispose of this waste.	Refer to Section 6.1.17 and Appendix 22Appendix 21 of this EIS.
Identify appropriate servicing arrangements for the site.	Refer to Section 6.1.17 and Appendix 22Appendix 21 of this EIS.
If buildings are proposed to be demolished or altered, provide a hazardous materials survey.	Refer to Appendix 23 of this EIS.
18. Aboriginal Cultural Heritage	
Provide an Aboriginal Cultural Heritage Assessment Report prepared in accordance with relevant guidelines, identifying, describing and assessing any impacts for any Aboriginal cultural heritage values on the site.	Refer to Section 6.1.18 and Appendix 24 of this EIS.
19. Environmental Heritage	
Where there is potential for direct or indirect impacts on the heritage significance of environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (if potential impacts to archaeological resources are identified), prepared in accordance with the relevant guidelines, which assesses	Refer to Section 6.1.19 and Appendix 25 of this EIS.



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any impacts and outlines measures to ensure they are minimised and mitigated.	
20. Social Impact	
Provide a Social Impact Assessment prepared in accordance with the <i>Social Impact Assessment Guidelines for State Significant Projects</i>.	Refer to Section 6.1.20 and Appendix 18 of this EIS.
21. Infrastructure Requirements and Utilities	
- In consultation with relevant service providers: - assess the impacts of the development on existing utility infrastructure and service provider assets surrounding the site. - identify any infrastructure upgrades required on-site and off-site to facilitate the development and any arrangements to ensure that the upgrades will be implemented on time and be maintained. - provide an infrastructure delivery and staging plan, including a description of how infrastructure requirements would be co-ordinated, funded and delivered to facilitate the development.	Refer to Section 6.1.21 and Appendix 27 of this EIS.
22. Bush Fire Risk	
If the development is on bush fire prone land, provide a bush fire assessment that details proposed bush fire protection measures and demonstrates compliance with <i>Planning for Bush Fire Protection</i>.	Refer to Section 6.1.22
23. Construction, Operation and Staging	
If staging is proposed, provide details of how construction and operation would be managed and any impacts mitigated.	Refer to Section 6.1.23 and PART 3 of this EIS.
24. Contributions and Public Benefit	
Address the requirements of any relevant contribution plan(s), planning agreement or EPI requiring a monetary contribution, dedication of land and/or works-in-kind and include details of any proposal for further material public benefit.	Refer to Section 6.1.24 of this EIS.
Where the development proposes alternative public benefits or a departure from an existing contributions framework, the local council, the Department and relevant State agencies are to be consulted prior to lodgement and details, including how comments have been addressed, are to be provided.	Refer to Section 6.1.24 of this EIS.
25. Engagement	
- Detail engagement undertaken and demonstrate how it was consistent with the <i>Undertaking Engagement Guidelines for State Significant Projects</i>. Detail how issues raised and feedback provided have been considered and responded to in the project. In particular, applicants must consult with: - the relevant Department assessment team. - any relevant local councils.	Refer to Section 6.1.25 and Appendix 28 of this EIS.



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- any relevant agencies (including the Western Parkland City Authority for development within the Western Parkland City). - the community. - if the development would have required an approval or authorisation under another Act but for the application of s 4.41 of the EP&A Act or requires an approval or authorisation under another Act to be applied consistently by s 4.42 of the EP&A Act, the agency relevant to that approval or authorisation.	
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APPENDIX B
DETAILED
MAPS AND
PLANS

REGISTER OF PROJECT MAPS/PLANS			
Drawing Number	Title	Revision	Date
Civil drawings			
C015091.00 – DA200	Erosion & Sediment Control Plan	C	28/10/24
C015091.00 – DA250	Erosion & Sediment Control Plan Details – Sheet 1	C	28/10/24
C015091.00 – DA251	Erosion & Sediment Control Plan Details – Sheet 2	C	28/10/24
C015091.00 – DA300	Bulk Earthworks Plan	H	28/10/24
C015091.00 – DA351	Bulk Earthworks Sections – Sheet 1	G	28/10/24
C015091.00 – DA352	Bulk Earthworks Sections – Sheet 2	G	28/10/24
C015091.00 – DA400	Stormwater Drainage Key Plan	I	28/10/24
C015091.00 – DA405	Council Stormwater Diversion Plan	B	28/10/24
C015091.00 – DA411	Stormwater Drainage Plan – Lower Ground Floor	F	28/10/24
C015091.00 – DA421	Stormwater Drainage Plan – Upper Ground Floor Warehouse C	E	28/10/24
C015091.00 – DA422	Stormwater Drainage Plan – Upper Ground Floor Warehouse A&B	F	28/10/24
C015091.00 – DA431	Stormwater Drainage Plan – Ground Floor Mezzanine Warehouse A&B&C	E	28/10/24
C015091.00 – DA440	Roof Plan	C	28/10/24
C015091.00 – DA441	Stormwater Drainage Plan – Level 1 Warehouse C	E	28/10/24
C015091.00 – DA442	Stormwater Drainage Plan – Level 1 Warehouse A&B	E	28/10/24
C015091.00 – DA451	Stormwater Drainage Plan – Level 1 Mezz Warehouse C	E	28/10/24
C015091.00 – DA452	Stormwater Drainage Plan – Level 1 Warehouse A&B	E	28/10/24
C015091.00 – DA461	Stormwater Drainage Details – Sheet 1	C	28/10/24
C015091.00 – DA462	Stormwater Drainage Details – Sheet 2	C	28/10/24
C015091.00 – DA463	Stormwater Drainage Details – Sheet 3	B	28/10/24
C015091.00 – DA471	Stormwater Catchment Plan – MUSIC	C	28/10/24
C015091.00 – DA481	Stormwater Tank 1 Details	B	28/10/24
C015091.00 – DA482	Stormwater Tank 2 Details	B	28/10/24
C015091.00 – DA500	Finished Levels Key Plan	H	28/10/24
C015091.00 – DA511	Finished Levels Plan – Lower Ground	G	28/10/24
C015091.00 – DA521	Finished Levels Plan – Ground Floor Warehouse C	E	28/10/24
C015091.00 – DA522	Finished Levels Plan – Ground Floor Warehouse A&B	F	28/10/24

C015091.00 – DA531	Finished Levels Plan – Ground Floor Mezz	E	28/10/24
C015091.00 – DA541	Finished Levels Plan – Level 1 Warehouse C	E	28/10/24
C015091.00 – DA542	Finished Levels Plan – Level 1 Warehouse A&B	E	28/10/24
C015091.00 – DA551	Finished Levels Plan – Level 1 Warehouse C	E	28/10/24
C015091.00 – DA552	Finished Levels Plan – Level 1 Warehouse A&B	E	28/10/24
C015091.00 – DA561	Typical Sections – Sheet 1	B	28/10/24
C015091.00 – DA562	Typical Sections – Sheet 2	B	28/10/24
Landscape Plans			
SSD-01	Landscape Master Plan: LGF & GF	G	28/10/24
SSD-02	Canopy Cover & Landscape	G	28/10/24
SSD-03	LGF & GF Detail Plan - Sheet 1	G	28/10/24
SSD-04	LGF & GF Detail Plan - Sheet 2	G	28/10/24
SSD-05	LGF & GF Detail Plan - Sheet 3	G	28/10/24
SSD-06	LGF & GF Detail Plan - Sheet 4	G	28/10/24
SSD-07	LGF & GF Detail Plan - Sheet 5	G	28/10/24
SSD-08	LGF & GF Detail Plan - Sheet 6	G	28/10/24
SSD-09	LGF & GF Detail Plan - Sheet 7	G	28/10/24
SSD-10	LGF & GF Detail Plan - Sheet 8	G	28/10/24
SSD-11	LGF & GF Detail Plan - Sheet 9	G	28/10/24
SSD-12	Landscape Section AA	G	28/10/24
SSD-13	Landscape Section BB & CC	G	28/10/24
SSD-14	Landscape Section DD	G	28/10/24
SSD-15	Upper Levels Detail Plans	G	28/10/24
SSD-16	Level 1 Mezzanine Amenity Area Master Plan	G	28/10/24
SSD-17	Level 1 Mezzanine Amenity Area Plan 01	G	28/10/24
SSD-18	Level 1 Mezzanine Amenity Area Plan 02	G	28/10/24
SSD-19	Level 1 Mezzanine Amenity Area Plan 03	G	28/10/24
SSD-20	Level 1 Mezzanine Amenity Area Section	G	28/10/24
SSD-23	Typical Specification & Details	G	28/10/24
SSD-24	Landscape Matrix Details	G	28/10/24
SSD-25	Estate Planting Schedule & Imagery	G	28/10/24
Architectural drawings			
DA001	3D View Perspectives – Percival Street	8	31/05/2024
DA002	3D View Perspectives – Britton Street	12	22/10/2024

DA050	Site Analysis and Development Summary	11	22/10/2024
DA100	Warehouse Plan – Lower Ground	20	22/10/2024
DA101	Warehouse Plan – Lower Ground Mezz	19	22/10/2024
DA102	Warehouse Plan – Ground	20	22/10/2024
DA103	Warehouse Plan – Ground Floor Mezz	19	22/10/2024
DA104	Warehouse Plan – Level 1	19	22/10/2024
DA105	Warehouse Plan – Level 1 Mezz	19	22/10/2024
DA106	Warehouse Roof Plan	12	22/10/2024
DA121	Vegetation Impact	11	22/10/2024
DA130	Warehouse Elevations – Sheet	13	22/10/2024
DA131	Warehouse Elevations – Sheet	12	22/10/2024
DA135	3D and Materials	8	22/10/2024
DA140	Warehouse and Sections – Sheet 1	17	06/09/2024
DA141	Warehouse and Sections – Sheet 2	13	06/09/2024
DA600	Signage Details – Warehouse Identification Sign - Sheet 1	6	06/09/2024
DA601	Signage Details – Warehouse Identification Sign – Sheet 2	4	22/10/2024
DA610	Signage Details – Tenancy Identification Sign	4	31/05/2024
DA615	Signage Details – Directional Sign	5	22/10/2024

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MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
Considerations under the EP&A Act and EP&A Regulation				
<i>Environmental Planning and Assessment Act 1979</i>	Section 1.3 – Objects of the Act	<i>(a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,</i>	The proposed development is appropriately located in an existing industrial area. The suitability of the subject site and the proposed development would see social and economic benefits for the area, without impacts to the State's natural and other resources.	N/A
		<i>(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,</i>	The proposal facilitates ecologically sustainable development.	Refer to Section 6.1.8 of the EIS.
		<i>(c) to promote the orderly and economic use and development of land,</i>	As well as fulfilling a significant role in satisfying market needs and improving the operational efficiencies of industrial and warehouse land uses within NSW, the proposal also demonstrates a logical redevelopment of a dated industrial site. The site's economic development is both logical and orderly for the following reasons: ▪ It delivers employment generating opportunities in both the construction and operational phases in an area already earmarked by both Regional and District policies for employment. ▪ It provides both a new economically and ecologically sustainable development, delivering new industry best practice in industrial construction. This is a solution	N/A



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MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
			to the increasing shortage of available industrial land across the Greater Sydney region. - It provides a genuine and obvious transition from existing industrial development, further reinforcing the notion of orderly development, within an area already designated for such purposes. - It implements best-practice sustainability measures to promote ecologically sustainable development. - It includes increased provisions for landscaping, helping to revitalise and naturally landscape a substantial canopy cover across the subject site. This further minimises the potential impacts of the Urban Heat Island Effect. - It improves water-quality for stormwater in accordance with the requirements of Council's engineering guidelines.	
		(d) to promote the delivery and maintenance of affordable housing,	This objective is not applicable to the proposed development, as the proposal does not seek consent for housing.	N/A
		(e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,	The subject site's biodiversity has been suitably assessed, including impacts to threatened and other species of native animals and plants, ecological communities and their habitats.	Refer to Section 6.1.9 of the EIS.



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Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
		(f) <i>to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),</i>	Both environmental and Aboriginal cultural heritage has been suitably assessed, finding that: ▪ The proposed development does not impact on any items of built heritage; and ▪ The entirety of the subject site is considered to be of low archaeological potential to contain Aboriginal cultural heritage and there will be no harm to known heritage values by the proposed works.	Refer to Section 6.1.18 and 6.1.19 of the EIS.
		(g) <i>to promote good design and amenity of the built environment,</i>	The vision of the proposed development is to create a quality built form with integrated landscaping. The proposed development is considered to promote both good design and improved amenity, through the use of new-age materials and innovative contemporary design. Colours proposed for the facades of the building are typical of this type of development with more muted recessive tones applied, that will transition well from the existing neighbouring developments. The proposed development can be seen to promote both good design and at the same time improving the amenity of the built environment through activation of the site by enhanced landscaping across the site. Through both the use of new-age materials and an innovative contemporary design, the	Refer to Section 6.1.3 and 6.1.4 of the EIS.



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Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
			proposed development allows the built form to connect with the natural landscape, to tie the built-form elements into a relatable thematic nexus to the natural environment, using industry-best-practice.	
		<i>(h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,</i>	The proposed development would be implemented through best-industry practice standards and measures. The proposal has been designed in accordance with the NCC. This incorporates into the design, all statutory and functional requirements, regarding access, egress and fire, which are deemed necessary to safeguard the safety of building occupants and the longevity of the development.	N/A
		<i>(i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,</i>	The proposal is SSD, which devolves the environmental planning and assessment of the application to NSW DPHI. Notwithstanding, the proposal has also been informed by engagement with Council and relevant government organisations.	N/A
		<i>(j) to provide increased opportunity for community participation in environmental planning and assessment.</i>	Community and stakeholder engagement has been undertaken for the proposed development. This has included meetings and notification letters to both agencies and all potentially impacted stakeholders.	Refer to Section 6.1.25 of the EIS.
	Section 4.15(1)(a) – Matters for	<i>(i) any relevant environmental planning instrument, and</i>	EPIs relevant to the proposal include: State Environmental Planning Policy (Planning Systems) 2021	Refer below.



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MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
	consideration— general		- State Environmental Planning Policy (Resilience and Hazards) 2021 - State Environmental Planning Policy (Industry and Employment) 2021 - State Environmental Planning Policy (Transport and Infrastructure) 2021 - State Environmental Planning Policy (Biodiversity and Conservation) 2021 - State Environmental Planning Policy (Sustainable Buildings) 2022 - Cumberland Local Environmental Plan 2021	
		(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and	There are no draft EPIs that are relevant to the proposal.	Refer below.
		(iii) any development control plan, and	Despite the relevance of Clause 2.10 of the State Environmental Planning Policy (Planning Systems) 2021, the Cumberland Development Control Plan 2021 has been considered and assessed.	Refer to Appendix 28 of this EIS.
		(iiia) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and	Not applicable – no planning agreements apply to the subject site or proposed development.	N/A



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MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
		<i>(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph),</i>	-	Refer below.
	Section 4.15(1)(b) – Matters for consideration—general	<i>the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,</i>	-	Refer to PART 6 of the EIS.
	Section 4.15(1)(c) – Matters for consideration—general	<i>the suitability of the site for the development,</i>	-	Refer to Section 2.6 of the EIS.
	Section 4.15(1)(d) – Matters for consideration—general	<i>any submissions made in accordance with this Act or the regulations</i>	This will be addressed as part of the forthcoming exhibition and response to submissions phases.	N/A
	Section 4.15(1)(e) – Matters for consideration—general	<i>the public interest</i>	-	Refer to Section 6.1.25 of the EIS.
<i>Environmental Planning and Assessment Regulation 2021</i>	Clause 190 – Form of environmental impact statement	<i>(1) An environmental impact statement must contain the following information—</i> <i>(a) the name, address and professional qualifications of the person who prepared the statement,</i> <i>(b) the name and address of the responsible person,</i> <i>(c) the address of the land—</i>	-	Refer to WHOLE EIS.



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MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
		(i) to which the development application relates, or (ii) on which the activity or infrastructure to which the statement relates will be carried out, (d) a description of the development, activity or infrastructure, (e) an assessment by the person who prepared the statement of the environmental impact of the development, activity or infrastructure, dealing with the matters referred to in this Division.		
		(2) The person preparing the statement must have regard to— (a) for State significant development—the State Significant Development Guidelines, or (b) for State significant infrastructure—the State Significant Infrastructure Guidelines.	-	Refer to WHOLE EIS .
		(3) An environmental impact statement must also contain a declaration by a relevant person that— (a) the statement has been prepared in accordance with this Regulation, and (b) the statement contains all available information that is relevant to the environmental assessment of the	-	Refer to EIS DECLARATION on page ii of the EIS.



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Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
		<i>development, activity or infrastructure, and (c) the information contained in the statement is not false or misleading, and (d) for State significant development or State significant infrastructure—the statement contains the information required under the Registered Environmental Assessment Practitioner Guidelines.</i>		
	Clause 191 – Compliance with environmental assessment requirements	<i>The environmental impact statement must comply with the environmental assessment requirements notified under section 176 or the Act, section 5.16(4).</i>	The SEARs (reference: SSD-67368956), issued by the NSW DPHI on 13 February 2024, identify the following Key Issues: 1. Statutory Context 2. Capital Investment Value and Employment 3. Design Quality 4. Built Form and Urban Design 5. Visual Impact 6. Traffic, Transport and Accessibility 7. Trees and Landscaping 8. Ecologically Sustainable Development (ESD) 9. Biodiversity 10. Air Quality 11. Noise and Vibration 12. Ground and Water Conditions	Refer to PART 6 of the EIS.



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MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
			13. Water Management 14. Flooding Risk 15. Hazards and Risks 16. Contamination and Remediation 17. Waste Management 18. Aboriginal Cultural Heritage 19. Environmental Heritage 20. Social Impact 21. Infrastructure Requirements and Utilities 22. Bush Fire Risk 23. Construction, Operation and Staging 24. Contributions and Public Benefit 25. Engagement	
Considerations under EPIs				
State Environmental Planning Policy (Planning Systems) 2021	Part 2.2 – State Significant Development	(1) Development is declared to be State significant development for the purposes of the Act if— (a) the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and (b) the development is specified in Schedule 1 or 2.	In accordance with Schedule 1, Clause 12 of the State Environmental Planning Policy (Planning Systems) 2021, development that has an EDC of more than \$50 million for the purpose of a warehouse or distribution centre, constitutes SSD. The EDC of the proposed development is 440,630,000 and therefore it is considered SSD.	Refer to Section 1.5 of this EIS.
		(2) If a single proposed development the subject of one development application comprises development that is only partly State	The proposal includes a café as an ancillary activity to the main warehouse and distribution centre.	N/A



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MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
		<i>significant development declared under subsection (1), the remainder of the development is also declared to be State significant development, except for—</i> <i>(a) so much of the remainder of the development as the Director-General determines is not sufficiently related to the State significant development, and</i> <i>(b) coal seam gas development on or under land within a coal seam gas exclusion zone or land within a buffer zone (within the meaning of clause 9A of State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007), and</i> <i>(c) development specified in Schedule 1 to State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007.</i>	This is ancillary to the development as it is provided to support the employees of the distribution operations (although will not be completely exclusive to those employees). Given the surrounding industrial context, there are limited options for food and drink premises. The development is large-scale, catering for up to 1,025 employees. In accordance with subclause (2)(a), it is considered that the café is sufficiently related to the state significant development.	
State Environmental Planning Policy (Resilience and Hazards) 2021	Clause 4.6 – Contamination and remediation to be considered in determining development application	(1) A consent authority must not consent to the carrying out of any development on land unless— (a) it has considered whether the land is contaminated, and (b) if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and	A DSI and RAP have been prepared for the subject site. Subject to the suitable implementation of the measures described in the RAP, it is concluded that the site will be or can be made suitable for the development and that the risks to the environment can be appropriately protected during the works.	Refer to Section 6.1.16 and Appendix 20 and Appendix 21 of this EIS.



STATUTORY COMPLIANCE TABLE

15 – 21 Britton Street, Smithfield
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MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
		(c) if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.		
State Environmental Planning Policy (Industry and Employment) 2021	Clause 3.6 – Granting of consent for signage	A consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied— (a) that the signage is consistent with the objectives of this Chapter as set out in section 3.1(1)(a), and (b) that the signage the subject of the application satisfies the assessment criteria specified in Schedule 5.	The proposal seeks consent for signage, which necessitates assessment against Chapter 3 and Schedule 5 of the Industry and Employment SEPP. The signage is described in Section 3.6.7 of this EIS and depicted on the architectural drawings at Appendix 4 . A full assessment of the Industry and Employment SEPP is provided at Appendix 30 .	Refer to Appendix 4 and Appendix 30 of this EIS.
State Environmental Planning Policy (Transport and Infrastructure) 2021	Division 5, Subdivision 2 – Development likely to affect an electricity transmission or distribution network	(1) This section applies to a development application (or an application for modification of a consent) for development comprising or involving any of the following— (a) the penetration of ground within 2m of an underground electricity power line or an electricity distribution pole or within 10m of any part of an electricity tower, (b) development carried out— (i) within or immediately adjacent to an easement for electricity purposes (whether or not the electricity infrastructure exists), or	The proposal involves work within or immediately adjacent to easements for electricity infrastructure. The proposal also involves new vehicle crossings and removal of trees underneath exposed overhead electricity power lines. It is acknowledged that the consent authority must provide notice to the electricity supply authority and incorporate any feedback received. Preliminary engagement has been undertaken with Endeavour Energy in relation to the proposed works and is ongoing.	Refer to Appendix 18 of this EIS.



STATUTORY COMPLIANCE TABLE

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Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
		(ii) immediately adjacent to an electricity substation, or (iii) within 5m of an exposed overhead electricity power line, (c) installation of a swimming pool any part of which is— (i) within 30m of a structure supporting an overhead electricity transmission line, measured horizontally from the top of the pool to the bottom of the structure at ground level, or (ii) within 5m of an overhead electricity power line, measured vertically upwards from the top of the pool, (d) development involving or requiring the placement of power lines underground, unless an agreement with respect to the placement underground of power lines is in force between the electricity supply authority and the council for the land concerned. (2) Before determining a development application (or an application for modification of a consent) for development to which this section applies, the consent authority must— (a) give written notice to the electricity supply authority for the area in which the development is to be carried out, inviting		



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MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
		<i>comments about potential safety risks, and</i> <i>(b) take into consideration any response to the notice that is received within 21 days after the notice is given.</i>		
	Division 17, Subdivision 2 – Development in or adjacent to road corridors and road reservations	<i>(1) This section applies to development specified in Column 1 of the Table to Schedule 3 that involves—</i> <i>(a) new premises of the relevant size or capacity, or</i> <i>(b) an enlargement or extension of existing premises, being an alteration or addition of the relevant size or capacity.</i> <i>(4) Before determining a development application for development to which this section applies, the consent authority must—</i> <i>(a) give written notice of the application to TfNSW within 7 days after the application is made, and</i> <i>(b) take into consideration—</i> <i>(i) any submission that RMS provides in response to that notice within 21 days after the notice was given (unless, before the 21 days have passed, TfNSW advises that it will not be making a submission), and</i> <i>(ii) the accessibility of the site concerned, including—</i>	The proposed development involves a warehouse and distribution centre with a site area greater than 8,000m², which constitutes traffic-generating development, as described in Schedule 3 of the Transport and Infrastructure SEPP. It is acknowledged that the consent authority must provide notice to TfNSW and incorporate any feedback received. Preliminary engagement with TfNSW has been undertaken, including a review of the draft TAIA.	Refer to Section 6.1.6 and Appendix 10 of the EIS.



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Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
		(A) the efficiency of movement of people and freight to and from the site and the extent of multi-purpose trips, and (B) the potential to minimise the need for travel by car and to maximise movement of freight in containers or bulk freight by rail, and (iii) any potential traffic safety, road congestion or parking implications of the development.		
State Environmental Planning Policy (Biodiversity and Conservation) 2021	Chapter 2 – Vegetation in non-rural areas	(1) A person must not clear vegetation in a non-rural area of the State to which Part 2.3 applies without the authority conferred by a permit granted by the council under that Part. (2) A person must not clear native vegetation in a non-rural area of the State that exceeds the biodiversity offsets scheme threshold without the authority conferred by an approval granted by the Native Vegetation Panel under Part 2.4.	The proposal involves the removal of 252 trees across the subject site (not including trees that are exempt under the CDCP 2021.	Refer to Section 6.1.7 and Appendix 26 of this EIS.
State Environmental Planning Policy (Sustainable Buildings) 2022	Chapter 3 – Standards for non-residential development, Clause 3.2	(1) In deciding whether to grant development consent to non-residential development, the consent authority must consider whether the development is designed to enable the following— (a) the minimisation of waste from associated demolition and	The proposal involves non-residential development, which warrants assessment against Chapter 3 of the Sustainable Buildings SEPP. A full assessment of these matters is included within the ESD Report. The embodied emissions attributable to the development have been quantified.	Refer to Appendix 12 and Appendix 31 of this EIS.



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MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
		<i>construction, including by the choice and reuse of building materials,</i> <i>(b) a reduction in peak demand for electricity, including through the use of energy efficient technology,</i> <i>(c) a reduction in the reliance on artificial lighting and mechanical heating and cooling through passive design,</i> <i>(d) the generation and storage of renewable energy,</i> <i>(e) the metering and monitoring of energy consumption,</i> <i>(f) the minimisation of the consumption of potable water.</i> <i>(2) Development consent must not be granted to non-residential development unless the consent authority is satisfied the embodied emissions attributable to the development have been quantified.</i>		
	Chapter 3 – Standards for non-residential development, Clause 3.3	<i>(1) In deciding whether to grant development consent to large commercial development, the consent authority must consider whether the development minimises the use of on-site fossil fuels, as part of the goal of achieving net zero emissions in New South Wales by 2050.</i>	Large commercial development is proposed, which therefore requires consideration of Clause 3.3(1) of the Sustainable Buildings SEPP. A Net Zero Statement has been prepared by Cundall for the proposed development.	Refer to Appendix 32 of this EIS.
		<i>(2) Development consent must not be granted to large commercial development unless the consent authority is satisfied the</i>	Large commercial development is proposed, which therefore requires consideration of Clause 3.3(2) of the Sustainable Buildings SEPP.	Refer to Appendix 33 of this EIS.



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MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
		<i>development is capable of achieving the standards for energy and water use specified in Schedule 3.</i> <i>(3) For the purposes of subsection (2), development is capable of achieving a standard specified in Schedule 3 if there is a NABERS commitment agreement in place to achieve the standard.</i>	NABERS agreements have been prepared for the proposed works.	
Cumberland Local Environmental Plan 2021	Clause 5.21 – Flood Planning	<i>(2) Development consent must not be granted to development on land the consent authority considers to be within the flood planning area unless the consent authority is satisfied the development—</i> <i>(f) is compatible with the flood function and behaviour on the land, and</i> <i>(g) will not adversely affect flood behaviour in a way that results in detrimental increases in the potential flood affectation of other development or properties, and</i> <i>(h) will not adversely affect the safe occupation and efficient evacuation of people or exceed the capacity of existing evacuation routes for the surrounding area in the event of a flood, and</i> <i>(i) incorporates appropriate measures to manage risk to life in the event of a flood, and</i> <i>(j) will not adversely affect the environment or cause avoidable erosion, siltation,</i>	The subject site is located within a flood planning area. The requirements of Council and the NSW Floodplain Development Manual have been addressed and are met for the proposed development, as described within the Civil Engineering Report.	Refer to Section 6.1.14 and Appendix 17 of the EIS.



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Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
		<i>destruction of riparian vegetation or a reduction in the stability of river banks or watercourses.</i> <i>(3) In deciding whether to grant development consent on land to which this clause applies, the consent authority must consider the following matters—</i> <i>(a) the impact of the development on projected changes to flood behaviour as a result of climate change,</i> <i>(b) the intended design and scale of buildings resulting from the development,</i> <i>(c) whether the development incorporates measures to minimise the risk to life and ensure the safe evacuation of people in the event of a flood,</i> <i>(d) the potential to modify, relocate or remove buildings resulting from development if the surrounding area is impacted by flooding or coastal erosion.</i>		
	Clause 6.2 – Earthworks	<i>(2) Development consent is required for earthworks unless—</i> <i>(a) the earthworks are exempt development under this Plan or another applicable environmental planning instrument, or</i> <i>(b) the earthworks are ancillary to other development for which development consent has been given.</i>	Earthworks are proposed as part of this SSDA, requiring consideration of Clause 6.2 of the CLEP 2021, as per below: (a) An overland flow path exists on the subject site, as described in the Civil Engineering Report. The effect on drainage patterns as a result of the	Refer to Section 6.1.12 and Appendix 17 of this EIS.



STATUTORY COMPLIANCE TABLE

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MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
		(3) <i>In deciding whether to grant development consent for earthworks, or for development involving ancillary earthworks, the consent authority must consider the following matters—</i> (a) <i>the likely disruption of, or the detrimental effect on, drainage patterns and soil stability in the locality of the development,</i> (b) <i>the effect of the development on the likely future use or redevelopment of the land,</i> (c) <i>the quality of the fill and the soil to be excavated,</i> (d) <i>the effect of the development on the existing and likely amenity of adjoining properties,</i> (e) <i>the source of the fill material and the destination of the excavated material,</i> (f) <i>the likelihood of disturbing relics,</i> (g) <i>the proximity to, and potential for adverse impacts on, a waterway, drinking water catchment or environmentally sensitive area,</i> (h) <i>appropriate measures proposed to avoid, minimise or mitigate the impacts of the development.</i>	proposed development is considered within the flood assessment. (b) The proposed development is a warehouse and distribution centre, which will replace an existing industrial facility. No hazardous uses are proposed. (c) The DSI and Geotechnical Assessment consider the quality of the soil to be excavated. (d) The effect of the development on the existing and likely amenity of adjoining properties is addressed throughout this whole EIS and consultant reports. It is acknowledged that the surrounding sites are industrial and do not contain any sensitive land uses. (e) Any fill material is likely to be sourced on site, through bulk earthworks. (f) The ACHA confirms there is a low risk of disturbing relics. (g) The subject site is not located in close proximity to waterways, drinking water catchments or environmentally sensitive areas. An ESCP is proposed to mitigate erosion and sedimentation (h) Various measures are proposed to mitigate the impacts of the proposed development. These are described in Appendix E.	



STATUTORY COMPLIANCE TABLE

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MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
	Clause 6.5 – Biodiversity	(2) <i>This clause applies to land shown as “Remnant Native Vegetation” on the Biodiversity Map.</i> (3) <i>In deciding whether to grant development consent for development on land to which this clause applies, the consent authority must consider—</i> (a) <i>whether the development is likely to have—</i> (i) <i>an adverse impact on the condition, ecological value and significance of the fauna and flora on the land, and</i> (ii) <i>an adverse impact on the importance of the vegetation on the land to the habitat and survival of native fauna, and</i> (iii) <i>the potential to fragment, disturb or diminish the biodiversity structure, function and composition of the land, and</i> (iv) <i>an adverse impact on the habitat elements providing connectivity on the land, and</i> (b) <i>appropriate measures proposed to avoid, minimise or mitigate the impacts of the development.</i> (4) <i>Development consent must not be granted to development on land to which this clause</i>	A small section of the subject site is identified as “remnant native vegetation” under the CLEP 2021. The majority of this vegetation was removed as part of a previous development consent. Nonetheless, a full assessment of biodiversity values has been undertaken for the proposal. The BDAR addresses all requirements under Clause 6.5.	Refer to Section 6.1.9 and Appendix 13 of this EIS.



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Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
		<i>applies unless the consent authority is satisfied that—</i> <i>(a) the development is designed, sited and will be managed to avoid an adverse environmental impact, or</i> <i>(b) if an adverse environmental impact cannot be avoided—the development is designed, sited and will be managed to minimise the impact, or</i> <i>(c) if an adverse environmental impact cannot be minimised—the development will be managed to mitigate the impact.</i>		
	Clause 6.7 – Stormwater management	<i>(2) Development consent must not be granted to development on land to which this clause applies unless the consent authority is satisfied that the development—</i> <i>(d) is designed to maximise the use of water permeable surfaces on the land having regard to the soil characteristics affecting on-site infiltration of water, and</i> <i>(e) includes, if practicable, on-site stormwater retention for use as an alternative supply to mains water, groundwater or river water, and</i> <i>(f) avoids significant adverse impacts of stormwater runoff on adjoining properties, native bushland and receiving waters, or if the impact cannot be reasonably avoided, minimises and mitigates the impact.</i>	New stormwater infrastructure is proposed as part of this SSDA, requiring consideration of Clause 6.7 of the CLEP 2021. The Civil Engineering Report addresses all requirements of Clause 6.7.	Refer to Section 6.1.14 and Appendix 17 of this EIS.



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MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
	Clause 6.9 – Salinity	(2) <i>This clause applies to land shown as “Known Salinity”, “High Salinity Potential” or “Moderate Salinity Potential” on the Salinity Map.</i> (3) <i>Development consent must not be granted to development on land to which this clause applies unless the consent authority has considered the following—</i> (a) <i>whether the development is likely to have an adverse impact on salinity processes on the land,</i> (b) <i>whether salinity is likely to have an impact on the development,</i> (c) <i>appropriate measures proposed to avoid, minimise or mitigate the impacts of the development.</i> (4) <i>Development consent must not be granted to development on land to which this clause applies unless the consent authority is satisfied that—</i> (d) <i>the development is designed, sited and will be managed to avoid a significant adverse environmental impact, or</i> (e) <i>if a significant adverse environmental impact cannot be avoided—the development is designed, sited and will be managed to minimise the impact, or</i>	The subject site is identified as “potential moderate salinity land”. Testing undertaken as part of the Geotechnical Assessment show that “non-saline” and “slightly saline” soil conditions are present. The Geotechnical Assessment confirms that a Salinity Management Plan is not required for the proposal.	Refer to Section 6.1.12 and Appendix 16 of this EIS.



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Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
		(f) <i>if a significant adverse environmental impact cannot be minimised—the development will be managed to mitigate the impact.</i>		
	Clause 6.12 – Urban Heat	(2) <i>In deciding whether to grant development consent for the purposes of commercial premises, industries or residential accommodation, the consent authority must consider whether—</i> (a) <i>the facade and roof of the proposed building and paved surfaces are designed to reduce adverse effects of solar heat on the surrounding land, including private open space and the public domain, and</i> (b) <i>the awnings and eaves of the building are designed to provide shelter from the sun and improve public comfort at street level, and</i> (c) <i>the heating, ventilation and air conditioning systems of the building are designed to minimise the release of heat in the direction of private open space and the public domain, and</i> (d) <i>the development maximises the use of green infrastructure that is strategically designed and managed to support a good quality of life in an urban environment, and</i> (e) <i>the development accommodates sufficient tree canopy, open space and</i>	A new industrial premise, including office, is proposed as part of this SSDA, requiring consideration of Clause 6.12 of the CLEP 2021. Large areas on the roof are dedicated for solar arrays in addition to glazing and translucent panels to bring natural light into every warehouse. Every unit experiences ample amount of natural sunlight. The north facing office facades are shaded by covered walkways, while the east and west facing facades incorporate shading devices and high-performance glazing that help mitigate solar heat gain while provide naturally light to the office spaces. The proposal seeks to retain existing trees where possible, and also proposes a site-wide landscaping plan to provide large-canopy tree cover across the subject site. Further measures for the building are outlined within the ESD Report.	Refer to Appendix 5 and Appendix 12 of this EIS.



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Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
		deep soil zones to achieve urban cooling benefits, and (f) the building is designed to achieve high passive thermal performance.		
Considerations under other legislation				
Commonwealth Environment Protection and Biodiversity Act 1999	Division 1 – Requirements relating to matters of national environmental significance	Division 1 – Requirements relating to matters of national environmental significance	The BDAR, prepared by écologique, has determined that the proposed development would not result in potential significant impacts to MNES.	Refer to Section 6.1.9 and Appendix 13 of this EIS.
Biodiversity Conservation Act 2016	Section 7.9 – Biodiversity assessment for State significant development or infrastructure	(1) This section applies to— (a) an application for development consent under Part 4 of the Environmental Planning and Assessment Act 1979 for State significant development, and (b) an application for approval under Division 5.2 of the Environmental Planning and Assessment Act 1979 to carry out State significant infrastructure. (2) Any such application is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.	écologique have prepared a BDAR as required by the SEARs and the BC Act.	Refer to Section 6.1.9 and Appendix 13 of this EIS.



MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	Section reference	Mandatory consideration	Relevance	Section in the EIS
		(3) <i>The environmental impact statement that accompanies any such application is to include the biodiversity assessment required by the environmental assessment requirements of the Planning Agency Head under the Environmental Planning and Assessment Act 1979.</i>		



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COMMUNITY ENGAGEMENT TABLE			
Stakeholder Group	Organisations	Matters Raised	Satisfied by
Aboriginal community	Heritage NSW	Heritage consultants, Austral Archaeology, undertook a staged consultation process. ▪ Stage 1 – In a letter dated 11 January 2024, Austral Archaeology reached out to a number of organisations requesting details of Aboriginal people who may hold cultural knowledge relevant to the project. - Heritage NSW responded, provided the proponent's Heritage Consultants with a list of stakeholders who may have an interest in the proposed development. - The Greater Sydney Local Land Services responded, providing a list of stakeholders that might be interested in the proposed development. - The Native Title Services Corporation Limited confirmed that there were no Native Title Claims on the proposed site. - Following this, letters were sent to the identified Aboriginal stakeholders and provided with a 14 day period to register an interest in the project. - An advertisement was placed in the Daily Telegraph to run on 17 February 2024, requesting the registration of individuals or organisations who hold cultural knowledge relevant to the project area. ▪ Stage 2: Austral provided each Aboriginal stakeholder with a copy of the project methodology on 23 February 2024. ▪ Stage 3: gathering information about cultural significance - Four responses were received. - All four organisations endorsed or supported the proposed methodology and further test excavations.	• The Proponent will continue to inform the Aboriginal stakeholders about the management of Aboriginal cultural heritage within the study area throughout the completion of the project. • A copy of the ACHA forwarded to all Aboriginal stakeholder groups who registered an interest in the project



COMMUNITY ENGAGEMENT TABLE			
Stakeholder Group	Organisations	Matters Raised	Satisfied by
		- During fieldwork, a representative from Darug Custodian Aboriginal Corporation confirmed that the entire study area is heavily disturbed and holds little archaeological potential. ▪ Stage 4: review of draft - The draft ACHA was provided to Aboriginal stakeholders for review	
NSW Government agencies	Department of Planning, Housing and Infrastructure (DPHI)	• Pre-scoping meeting held 18 January 2024. During this meeting, Department representatives and the project team discuss: - the need to consult relevant authorities about nearby pipelines and easements, particularly the northern pipeline's impact on construction - the importance of compliance with Environment and Heritage, Council requirements for flooding, SEPP33 and SEARs requirements for dangerous goods storage. - Requirements for comprehensive and accurate traffic data and the preparation of a detailed Construction Traffic Management Plans (CTMP) • The proponent issued a request for SEARs on 6 February 2024 • DPHI provided the proponent with a copy of the industry specific SEARs for demolition of on-site structures, construction and 24/7 operation of a multi-level warehouse and distribution centre on 1 February 2024	None Required
	EPA	• HillPDA contacted the EPA team on 8 March 2024, providing an overview of the project and requesting feedback or comment. • A follow up query was made on 25 March 2024, but no response was received.	None Required



COMMUNITY ENGAGEMENT TABLE			
Stakeholder Group	Organisations	Matters Raised	Satisfied by
	Heritage NSW	- Heritage NSW were contacted by heritage consultants from Austral Archaeology on behalf of the proponent. - Heritage NSW provided a list of stakeholders with ties to the Local Aboriginal community who may have an interest in the proposed development.	None Required
	TfNSW	Transport Engineer from Arup contacted the development team TfNSW via email on 20 February 2024 and provided an overview of the proposed development and requested requirements for the transport assessment. Traffic and Transport Impact Assessment to include: - Analysis of the existing traffic network, including the road hierarchy, current and future daily peak hour (light and heavy) vehicle movements and existing performance levels of nearby intersections. - Specifically, TfNSW requests further assessment of the following signalised intersections: - Percival Road/ Warren Road - Herbert Place/ Long Street/ Warren Road - A forecast of additional daily and peak hour vehicle movements resulting from proposal (using SIDRA modelling or similar at 5-year intervals) and identification of potential traffic impacts on road capacity, intersection performance and road safety (including pedestrian and cycle conflict). - Undertake traffic and network modelling to understand the impacts of the development site and intersections, plus any traffic changes as a result any planned or committed road projects. - Proposals to mitigate any traffic impacts, including intersection upgrades to achieve acceptable performance.	TfNSW requirements addressed in the Traffic and Transport Impact Assessment, Green Travel Plan and Travel Access Guide prepared by Arup



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COMMUNITY ENGAGEMENT TABLE			
Stakeholder Group	Organisations	Matters Raised	Satisfied by
		• Details of car parking provision, having regard to relevant parking rates, specifications and standards. • Details of proposed vehicular access, loading and unloading deliveries and servicing arrangements, and any proposed infrastructure improvements or measures to reduce potential conflicts with pedestrians and cyclists. • Swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site. Details of road upgrades, infrastructure works, or new roads or access points required for the development Green Travel Plan (GTP) to include: • Objectives and modes share targets to reduce car use and increase public and active transport (i.e. site and land use specific, measurable and achievable and timeframes for implementation) to define the direction and purpose of the GTP; • Specific tools and actions to help achieve the objectives and mode share targets; • Measures to promote and support the implementation of the plan, including financial and human resource requirements, roles and responsibilities for relevant employees involved in the implementation of the GTP; • Consideration of car parking management strategies that may be required to encourage sustainable transport use / mode share targets; • A detailed Implementation Plan comprising specific tasks needed to complete the proposed actions, the person/s responsible for completion of the task, completion date and anticipated costs; and	



COMMUNITY ENGAGEMENT TABLE			
Stakeholder Group	Organisations	Matters Raised	Satisfied by
		- Details regarding the methodology and monitoring/review program to measure the effectiveness of the objectives and mode share targets of the GTP, including the frequency of monitoring and the requirement for travel surveys to identify travel behaviours of users of the development. GTP to include a Travel Access Guide (TAG) as an appendix, including: - A more comprehensive map showing all modes of public and active transport, including buses (private and public), trains, walking and cycling routes, as well as times for these public transport options - Provide information advising employees and visitors that additional information about service routes and timetables for buses and trains is available on the Trip Planner at transportnsw.info/ - Provide information employees and visitors that additional information about walking routes is available on the Trip Planner at transportnsw.info/ - Update number and location of End of Trip facilities (bike racks, showers, lockers, change rooms) and locate on	
	Water NSW	- Email sent on 17 February 2024 by Tactical Group on behalf of the proponent regarding SEARs requirement for a vibration assessment to be provided with the SSDA addressing potential impacts on a pipeline to the north of the site. - Response received 17 February, confirming that the pipe in question was not a WaterNSW asset - Project manager from WaterNSW determined the pipe in question to be the Prospect to Pots hill pipeline managed by Sydney Water (Downstream of Sydney Water Prospect Filtration Plant).	None Required



COMMUNITY ENGAGEMENT TABLE

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COMMUNITY ENGAGEMENT TABLE			
Stakeholder Group	Organisations	Matters Raised	Satisfied by
	NSW Environment and Heritage	- Engagement with NSW Environment and Heritage was undertaken by Willowtree via DPHI on behalf of the proponent. - Biodiversity and Conservation Division (BCD) rejected proponent's request for engagement on 5 April 2024 rejecting their request for engagement. - BCD replied to the invitation for engagement stating that a meeting was not required	None required
	Sydney Water	- Statement of Pressure and Flow lodged with Sydney Water by the proponent's service infrastructure coordinators to ensure sufficient water or pressure available in the nearest water main to serve the proposed development. - Enquiry found that reasonable pressure & flow would be available to service the development and noted that fire hydrant/sprinkler installations drawing 60litres/second will achieve a pressure head of 13 metres - Feasibility application lodged with Sydney Water. It is anticipated that this will note that development requires connection to the 150mm main in Britton Street.	None required
	Natural Resources Access Regulator (NRAR)	- HillPDA contacted the DPHI Water Licensing Service Desk via email on 8 March 2024, providing an overview of the project and requesting feedback or comment. - A follow up query was made on 25 March 2024, but no response was received.	None required
Infrastructure providers	Endeavour Energy	- Technical Review Request lodged with Endeavour Energy for the proposed development. - Endeavour Energy responded via email on 29 February 2024. - Endeavour confirmed the site will be re-developed with a total proposed load of 2.5MVA and noted that the site has multiple Padmount substations and connections points. Endeavour	None required



COMMUNITY ENGAGEMENT TABLE			
Stakeholder Group	Organisations	Matters Raised	Satisfied by
		Energy provided a map which showed the locations of the HV reticulation present on site, including an HV Feeder available to supply the proposed load from Britton St and another to supply the proposed load from Percival Road.	
	NCNCo.	- HillPDA contacted the NBN Developer Liaison team on 8 March 2024, providing an overview of the project and requesting feedback or comment. - A follow up query was made on 25 March 2024, but no response was received.	NBNCo. Assts are to be considered in the Services Infrastructure Assessment, to be prepared by Arup.
Local government	Cumberland City Council	- Meeting held 4 March 2024 to present preliminary masterplan. - Several key topics were discussed including biodiversity concerns, truck access and traffic (associated with the site's proposed 24/7 operation, stormwater and drainage requirements, crossovers and parking impact and state design control panel requirements.	Comments from Council have been addressed in various technical reports to accompany the SSDA submission



APPENDIX E
MITIGATION
MEASURES
TABLE

MITIGATION MEASURES TABLE

15 – 21 Britton Street, Smithfield
 Lot 1 DP 597082 and Lot 34 DP 617521

SSD-67368956

By:	Lendlease Real Estate Investments as responsible entity for Australian Prime Property Fund Industrial
In relation to:	State Significant Development Application (SSD-67368956) For 15- 21 Britton Street Multi-Level Warehouse
Site:	15 – 21 Britton Street and 28 – 54 Percival Road, Smithfield Lot 1 DP 597082 and Lot 34 DP 617521

Lendlease plan to undertake the construction and operation of the proposed warehouse and distribution centre, in accordance with the following planned management and mitigation measures.

PLANNED MANAGEMENT AND MITIGATION MEASURES FOR SSD-67368956		
ID	Management / Mitigation Measure	Timing
Administrative Commitments		
A1	Commitment to Minimise Harm to the Environment Lendlease will commit to implement all reasonable and feasible measures, to prevent and/or minimise any harm to the environment, that may result from the construction or operation of the proposed development	Prior to construction, during construction, and during operation.
A2	Terms of Approval Lendlease will carry out the project generally in accordance with the: (a) Environmental Impact Statement; (b) Drawings; (c) Management and Mitigation Measures; (d) Any Conditions of Approval. If there is any inconsistency between the above, the Conditions of Approval shall prevail to the extent of the inconsistency.	Prior to construction, during construction, and during operation.
A3	Occupation Certificate Lendlease will ensure that Occupation Certificates are obtained prior to the occupation of the facilities.	Prior to operation.
A4	Compliance Lendlease will ensure compliance with any reasonable requirement(s) of the Secretary of the NSW DPHI arising from the assessment of: (a) Any reports, plans, programs, strategies or correspondence that are submitted in relation to this Approval; and (b) The implementation of any recommended actions or measures contained in reports, plans, programs, strategies or correspondence submitted by the Project Team as part of the application for Approval.	Prior to construction, during construction, and during operation.
A5	Structural Adequacy Lendlease will ensure that all new buildings and structures on the site are constructed in accordance with the relevant requirements of the National Construction Code.	During construction.



PLANNED MANAGEMENT AND MITIGATION MEASURES FOR SSD-67368956		
ID	Management / Mitigation Measure	Timing
A6	Construction Environmental Management Plan Prior to the commencement of construction, Lendlease would prepare a Construction Environmental Management Plan (CEMP) that addresses the following: (a) Air Quality; (b) Noise and Vibration; (c) Waste Classification; (d) Erosion and Sediment Control; (e) Hazardous Materials; (f) Fauna and Fauna; (g) Traffic Management; and (h) Community Consultation and Complaints Handling.	Prior to construction.
A7	Site Induction All staff employed on the site by the construction contractor will be required to undergo a site induction.	Prior to construction.
A8	Operation of Plant and Equipment Lendlease will ensure that all plant and equipment used on-site, is maintained and operated in proper and efficient manner, and in accordance with relevant Australian Standards.	During operation.
A9	Monitoring the State of Roadways Lendlease will monitor the state of roadways leading to and from the subject site, during construction, and will take all necessary steps to clean up any adversely impacted road pavements as directed by the Cumberland City Council.	During construction.
A10	Waste Receipts Lendlease will ensure that a permanent record of receipts, for the removal of both liquid and solid waste from the subject site, be kept and maintained up to date at all times. Such records will be made available to authorised person upon request.	During construction and operation.
A11	Complaints Handling Lendlease will prepare an Operational Complaints Handling Protocol for the development, prior to the commencement of operations.	Prior to operation.
A12	Soil and Water Management A Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan (ESCP), or equivalent, will be implemented for the construction of the proposed development.	Prior to and during construction.
Specific Environmental Commitments		
Air Quality		
AQ1	Air quality mitigation and monitoring will form part of the CEMP, to be prepared for the project, as outlined in A6 .	Prior to construction.
AQ2	Lendlease will implement the dust control measures as outlined in the AQIA.	During construction.



PLANNED MANAGEMENT AND MITIGATION MEASURES FOR SSD-67368956		
ID	Management / Mitigation Measure	Timing
Noise and Vibration		
NV1	A detailed CNVMP will be prepared and will form part of the CEMP, to be prepared for the project, as outlined in A6 .	Prior to and during construction.
NV2	Lendlease will implement the noise and vibration management measures as outlined in the NVIA.	Prior to and during construction.
NV3	Lendlease will consult with Sydney Water in relation to the development of the CNVMP.	Prior to and during construction.
Traffic and Transport		
TT1	Lendlease will finalise and implement the Construction Traffic Management Plan (CTMP).	Prior to and during construction.
TT2	Lendlease will finalise and implement the Green Travel Plan (GTP).	During operation.
Contamination		
C1	Lendlease will undertake the additional investigations as identified within the DSI. Should these investigations require that remediation is required, a Remedial Action Plan shall be prepared.	Prior to construction
Hazards & Risks		
HR1	Demolition of existing buildings and structures will be undertaken in accordance with the recommendations outlined in the Hazardous Materials Survey.	During construction.
Cultural Heritage		
H1	An Unexpected Finds Policy will be developed, in the unlikely event that relics are identified during ground disturbing works.	Prior to construction.
H2	Unexpected Aboriginal objects remain protected by the <i>National Parks and Wildlife Act 1974</i> . If any such objects, or potential objects, are uncovered in the course of the activity, all work in the vicinity will cease immediately. A qualified archaeologist would be contacted to assess the find and Heritage NSW and Metropolitan Local Aboriginal Land Council would be notified.	During construction.
H3	If human remains, or suspected human remains, are found in the course of the activity, all work in the vicinity will cease, the site would be secured, and the NSW Police and Heritage NSW would be notified	During construction.
H4	All relevant staff, contractors and subcontractors will be made aware of their statutory obligations for heritage under the NSW <i>Heritage Act 1977</i> and best practice as outlined in <i>The Burra Charter 2013</i> , during site inductions.	Prior to construction.
Socio-Economic		
SE1	Lendlease will notify surrounding businesses and residents one (1) week before commencement of construction activities. Notices should include: ▪ Details of the proposal, including contact details of management team	Prior to construction.



PLANNED MANAGEMENT AND MITIGATION MEASURES FOR SSD-67368956		
ID	Management / Mitigation Measure	Timing
	- Hours and expected period of construction - Details regarding process should businesses or residents have concerns, questions or complaints	
SE2	Lendlease will set up a feedback process to manage and respond to stakeholder concerns, questions, or complaints. Lendlease will ensure that this process is clear and accessible to stakeholders such as surrounding businesses and residents.	Prior to and during construction.
SE3	Lendlease will prioritise engaging with local businesses, where practicable, e.g. site induction for visiting workers to include profile of surrounding food and beverage retailer.	During construction.
Waste Management		
WM1	Effective management of construction materials and construction and demolition waste, including options for reuse and recycling where applicable and practicable, would be conducted. Only wastes that cannot be cost effectively reused or recycled will be sent to landfill or appropriate disposal facilities.	During construction.
WM2	Waste materials produced from site preparation and construction activities will be separated at the source and stored separately on-site.	During construction.
WM3	The Site Manager or equivalent role will: - Arrange for suitable waste collection contractors to remove any construction waste from site - Ensure waste bins are not filled beyond recommended filling levels - Ensure that all bins and loads of waste materials leaving site are covered - Maintain waste disposal documentation detailing, at a minimum: - Descriptions and estimated amounts of all waste materials removed from site - Details of the waste and recycling collection contractors and facilities receiving the waste and recyclables - Records of waste and recycling collection vehicle movements, for example, date and time of loads removed, licence plate of collection vehicles, tip dockets from receiving facility, and - Waste classification documentation for materials disposed to off-site recycling or landfill facilities. - Ensure lawful waste disposal records are readily accessible for inspection by regulatory authorities such as Cumberland City Council, SafeWork NSW or NSW EPA, and - Remove waste during hours approved by Council.	During construction.



PLANNED MANAGEMENT AND MITIGATION MEASURES FOR SSD-67368956		
ID	Management / Mitigation Measure	Timing
WM4	Site inductions, as required under A7 will ensure the following training is covered: - Legal obligations and targets - Emergency response procedures on-site - Waste priorities and opportunities for reduction, reuse, and recycling - Waste storage locations and separation of waste - Procedures for suspected contaminated and hazardous wastes - Waste related signage - The implications of poor waste management practices, and - Responsibilities and reporting, including identification of personnel responsible for waste management and individual responsibilities.	Prior to construction.
Vegetation Management		
VM1	The approved Tree Protection Management Plan shall be implemented, and tree protection measures must be installed and maintained, as required and to the satisfaction of the project arborist.	Prior to and during construction.
VM2	Site inductions, as required under A7 will ensure that the following training is covered: Understanding of the Tree Protection Management Plan	Prior to construction.
VM3	Inspections shall be conducted by the project arborist at several key points during the construction in order to ensure that protection measures are being adhered to during construction stages and decline in tree health or additional remediation measures can be identified.	During construction.
VM4	All earthworks within the identified tree protection zones of the trees to be retained, shall be supervised by the project arborist.	During construction.
Biodiversity		
B1	A Fauna and Flora Management Plan will be prepared, including the recommendations outlined in the BDAR. This will form part of the CEMP, as outlined in A6 .	Prior to and during construction.
Landscaping		
L1	Lendlease will implement the proposed landscaping as identified on the Landscape Plans.	During construction
ESD		
E1	Lendlease will target a Certified 5 Star Green Star Design & As-Built v1.3 Rating.	Prior to construction, during construction, and during operation.

