

Planning Secretary's Environmental Assessment Requirements

Gow Street Manufacturing and Warehouse Facility



Application Number	SSD-71052213
Project Name	Gow Street Manufacturing and Warehouse Facility
Development	Redevelopment of the existing site to include the refurbishment of an existing warehouse for chemical manufacturing and construction of a new laboratory and warehouse facility for the storage and distribution of sealants, adhesives, fillers and household cleaning products,
Location	15 and 20 Gow Street, Padstow
Applicant	Selleys (Dulux Group Australia Pty Limited)
Date of Issue	18 June 2024
General Requirements	<p>The Environmental Impact Statement (EIS) for the development must:</p> <ul style="list-style-type: none"> • comply with these assessment requirements • meet the form and content requirements in sections 190 and 192 of the Environmental Planning and Assessment Regulation 2021 (the Regulation) • have regard to the Department's <i>State Significant Development Guidelines (2021)</i>. <p>In addition, the EIS must include:</p> <ul style="list-style-type: none"> • a clear comprehensive description of the proposal for the site, including details of all activities and processes proposed to be carried out as part of the development along with explanation of how the development integrates with the existing operations and onsite activities that are to remain within the entire site. • consideration of issues discussed in the public authority responses to request for key issues (see Attachment 2) • a detailed assessment of the key issues specified below, including: <ul style="list-style-type: none"> – a description of the existing environment, using sufficient baseline data – an assessment of the potential impacts of all stages and activities that form part of the development, including any cumulative impacts, taking into consideration relevant guidelines, policies, plans and statutes – a description of the measures that would be implemented to avoid, minimise, mitigate and if necessary, offset the potential impacts of the development, including proposals for adaptive management and/or contingency plans to manage significant risks to the environment. <p>The EIS must also be accompanied by:</p> <ul style="list-style-type: none"> • an Estimated Development Cost (EDC) Report prepared in accordance with the relevant planning circular using the Standard Form of EDC Report • 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 • high quality files of maps and figures of the subject site and proposal • certification that the information provided is accurate at the date of preparation • a declaration from a Registered Environmental Assessment Practitioner that your EIS includes the information specified in the Department's <i>Registered Environmental Assessment Practitioner Guidelines</i>.
Key issues	<p>The EIS must address the following specific matters:</p> <ul style="list-style-type: none"> • Statutory and Strategic Context – including: <ul style="list-style-type: none"> – justification for the proposal and the suitability of the site – detailed justification that the proposed land use is permissible with consent – a detailed description of the history of the site, including the relationship between the proposed development and all development consents and approved plans previously and/or currently applicable to the site – demonstration that the proposal is consistent with all relevant planning strategies, environmental planning instruments, adopted precinct plans, draft district plan(s)

and adopted management plans and justification for any inconsistencies. This includes, but is not limited to:

- State Environmental Planning Policy (Biodiversity and Conservation) 2021
- State Environmental Planning Policy (Industry and Employment) 2021
- State Environmental Planning Policy (Planning Systems) 2021
- State Environmental Planning Policy (Resilience and Hazards) 2021
- State Environmental Planning Policy (Sustainable Buildings) 2022
- State Environmental Planning Policy (Transport and Infrastructure) 2021
- Canterbury-Bankstown Local Environment Plan 2023
- Greater Sydney Region Plan: A Metropolis of Three Cities
- Our Greater Sydney 2056: Central City District Plan
- Future Transport Strategy 2056.
- **Community and Stakeholder Engagement** – a community and stakeholder engagement strategy consistent with the Department's *Undertaking Engagement Guidelines for State Significant Projects* for all stages of the development, including (but not limited to):
 - details of how issues raised, and feedback provided during engagement activities have been considered and responded to in the development
 - details of the proposed approach to future community and stakeholder engagement based on the results of consultation.
- **Traffic and Transport** – a quantitative traffic impact assessment prepared in accordance with relevant Transport for NSW and Austroads guidelines, that includes:
 - details of daily and peak traffic volumes likely to be generated during construction and operation, (including consideration of the existing onsite operational traffic that are not part of the proposal)
 - details of key access / haul routes, vehicle types and any potential queuing impacts
 - an assessment of the predicted impacts of development traffic on road safety and the capacity of the road network, including consideration of cumulative traffic impacts on existing performance levels of nearby intersections (particularly the intersection of Canterbury Road and Gow Street) using a calibrated SIDRA (or similar) traffic model
 - 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 the proposed internal road network, loading docks, pedestrian and cycling facilities and on-site parking in accordance with the relevant Australian Standards
 - details of the largest vehicle anticipated to access and move within the site, including swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site and at key intersections
 - details of road upgrades, infrastructure works or new roads or access points required for the development if necessary.
 - details of any Traffic Management Plan required to manage construction and operational traffic.
- **Noise and Vibration** – a quantitative noise and vibration impact assessment undertaken by a suitably qualified acoustic consultant in accordance with the relevant Environment Protection Authority guidelines and Australian Standards which includes:
 - the identification of impacts associated with construction, site emission and traffic generation from the proposal at noise affected sensitive receivers, including the provision of operational noise contours and a detailed sleep disturbance assessment
 - details of background noise monitoring survey undertaken in accordance with Fact Sheet A1 of the Noise Policy for Industry (excluding operational noise from the existing development)
 - details of noise source inventory for the development and 'worst case' noise emission scenarios
 - consideration of annoying characteristics of noise and prevailing meteorological conditions in the study area
 - assessment of operational noise against project amenity noise levels derived in accordance with Section 2.4.2 of the Noise Policy for Industry for the redevelopment of an existing cluster of industry
 - details and analysis of the effectiveness of proposed management and mitigation measures to adequately manage identified impacts from the proposed works,

including a clear identification of residual noise and vibration following application of mitigation these measures and details of any proposed compliance monitoring programs.

- **Air Quality and Odour** – an assessment of the potential air quality, dust and odour impacts of the development (construction and operation) on surrounding landowners, businesses and sensitive receptors, in accordance with relevant Environment Protection Authority guidelines, including details of proposed mitigation, management and monitoring measures.
- **Water Management** – an integrated water management strategy, including:
 - a detailed site water balance including a description of the water demands and breakdown of water supplies, measures to minimise water use and any water licensing requirements
 - a description of groundwater and surface water conditions and all works/activities that may intercept, extract, use, divert or receive surface water and/or groundwater (both temporary and permanent)
 - an assessment of potential surface and groundwater impacts (both quality and quantity) associated with the development, including potential impacts on watercourses, riparian areas, groundwater, and groundwater-dependent communities nearby in accordance with relevant water quality guidelines and the Department of Climate Change, Energy, the Environment and Water - Water Group (DCCEEW-Water) Groundwater Toolkit
 - details of how the proposed stormwater and wastewater drainage design integrates with existing on-site systems, including details of the capacity of onsite detention system(s), onsite sewage management and measures to treat, reuse or dispose of water
 - a surface water discharge assessment in accordance with relevant EPA guidelines, including an assessment of potential impacts on watercourses and riparian areas, and characterisation of water quality at the point of discharge against the relevant water quality criteria
 - details of any surface or groundwater mitigation, management and monitoring activities and methodologies.
- **Flooding** – a flood impact risk assessment (FIRA) prepared in accordance with the *Flood risk management guideline LU01 - Flood impact and risk assessment (2023)*. The FIRA must:
 - identify the flood planning level and any flood risk on-site (mainstream and overland) having regard to adopted (available and recent) flood studies, the potential effects of climate change, and any relevant provisions of the NSW Flood Risk Management Manual (2023)
 - 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
 - identify flood behaviour, flood constraints and risks on the site and adjoining areas including the potential impacts of climate change for the full range of events up to and including the probable maximum flood (PMF) event
 - include details of proposed management measures to minimise the impacts of flooding on the development and flood risk to the community
 - detail, where required, an emergency management and response strategy for local catchment (and/or overland) and mainstream flooding, which:
 - identifies potential options for emergency management and response, including safe evacuation from the site and/or shelter-in-place, based on adopted flood studies and flood warnings from the Bureau of Meteorology (where available)
 - evaluates the performance of safe evacuation from the site, including consideration of possible constraints of existing road networks, potential interruptions of traffic flows, and the lead time for evacuation from existing flood warning services
 - identifies the primary emergency management and response approach under significant events, up to and including the PMF event.
- **Contamination** – a site contamination assessment in accordance with the Managing Land Contamination Planning Guidelines: SEPP 55 – Remediation of Land (DUAP, 1998), including:
 - characterisation of the nature and extent of any contamination on the site and surrounding area

- a Detailed Site Investigation (DSI) and a Remedial Action Plan, if the Preliminary Site Investigation indicates contamination is present and a DSI is required.
- **Soils** – an assessment of potential impacts on soil resources and riparian areas on and near the site, including:
 - impacts on soil erosion, salinity and acid sulfate soils
 - details of earthworks, including cut and fill volumes
 - description of the proposed erosion and sediment controls during construction.
- **Hazard and Risk** – including:
 - a preliminary risk screening completed in accordance with State Environmental Planning Policy (Resilience and Hazards) 2021 and Applying SEPP 33 (DoP, 2011), that includes:
 - a clear indication of class, storage and handling quantities and location of all dangerous goods and hazardous materials within the entire site (new development and existing operations)
 - a Preliminary Hazard Analysis (PHA) prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis (DoP, 2011) and Multi-Level Risk Assessment (DoP, 2011), should the preliminary risk screening indicate that the project is “potentially hazardous”
 - given the proximity of Salt Pan Creek, consideration of the effects of a contaminated water release on the environment should be included in the PHA.
- **Fire and Emergency Services** – including plans and details of proposed operational access for emergency services personnel in accordance with the *Fire and Rescue NSW fire safety guideline - Access for fire brigade vehicles and firefighters* (V05.01 dated November 2020).
- **Visual** - a visual impact assessment (including photomontages and perspectives) of the development layout and design (buildings and storage areas), including:
 - details of staging, site coverage, setbacks, open space, landscaping, height, colour, scale, building materials and finishes, façade design, signage and lighting, particularly in terms of potential impacts on:
 - nearby public and private receivers
 - significant vantage points in the broader public domain
 - consideration of the layout and design of the development having regard to the surrounding vehicular, pedestrian and cycling networks
 - detailed plans showing suitable landscaping which incorporates endemic species.
- **Waste Management** – a waste management report that includes:
 - details of the quantities and classification of all waste streams to be generated on site during the development
 - details of waste storage, handling and disposal during the development
 - details of the measures that would be implemented to ensure that the development is consistent with the aims, objectives and guidance in the NSW Waste and Sustainable Materials Strategy 2041.
- **Infrastructure Requirements** – an infrastructure delivery, management and staging plan that includes:
 - an assessment of impacts on existing utility infrastructure
 - details of any extension or augmentation of utilities required to service the development and details of how required upgrades would be delivered and funded, including arrangements for electrical network requirements, drinking water, wastewater and recycled water
 - identification of any existing infrastructure or easements on or off the site which may be impacted by construction or operation of the development and details of measures to be implemented to address any impacts.
- **Aboriginal Cultural Heritage** – unless otherwise agreed to in writing by Heritage NSW, an Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared in accordance with the Code of Practice for Archaeological Investigation in NSW (DECCW 2010), and guided by the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales (OEH 2011). The ACHAR must:
 - identify, describe and assess impacts on the Aboriginal cultural heritage values that exist across the development site
 - provide evidence and details of consultation with Aboriginal people in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010)
 - include results of a surface survey and any test excavations and an unexpected finds protocol.

	<ul style="list-style-type: none"> • Non-Aboriginal Cultural Heritage – a non-Aboriginal cultural heritage assessment (including both cultural and archaeological significance) which must detail potential impacts on heritage assets and any proposed management and mitigation measures. • Biodiversity – an assessment of the proposal's biodiversity impacts in accordance with the <i>Biodiversity Conservation Act 2016</i>, including the preparation of a Biodiversity Development Assessment Report (BDAR) where required under the Act, except where a waiver for preparation of a BDAR has been granted. • Social – a social impact assessment in accordance with the Department's <i>Social Impact Assessment Guideline</i> • Ecologically Sustainable Development – including: <ul style="list-style-type: none"> – identification of how ESD principles (as defined in section 193 of the EP&A Regulation) are incorporated in the design and ongoing operation of the development – demonstration of how the development will meet or exceed the relevant industry recognised building sustainability and environmental performance standards – demonstration of 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 – if Chapter 3 of State Environmental Planning Policy (Sustainable Buildings) 2022 applies: <ul style="list-style-type: none"> ○ demonstrate how the development has been designed to address the provisions set out 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 35BA of the EP&A Regulation. • Planning Agreement/Development Contributions – including consideration of any applicable State and local development contributions, such as the Housing and Productivity Contribution and/or draft contributions plan(s), and/or details of any Voluntary Planning Agreement required should a contributions plan not be in place.
Consultation	<p>During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners.</p> <p>In particular you must consult with:</p> <ul style="list-style-type: none"> • Canterbury Bankstown Council • Department of Climate Change, Energy, the Environment and Water, specifically the: <ul style="list-style-type: none"> ○ Environment and Heritage Group ○ Water Group ○ Environment Protection Authority • Heritage NSW • Transport for NSW • Fire & Rescue NSW • Sydney Water • Endeavour Energy • Jemena • surrounding local landowners, businesses and stakeholders • local and regional community and environmental groups • Gandangara Local Aboriginal Land Council • any other public transport, utilities or community service providers.
SEARs Expiry	SEARs will expire two years after the date of issue (or the date they were last modified).
References	The assessment of the key issues listed above must take into account relevant guidelines, policies, and plans as identified. While not exhaustive, Attachment 1 contains a list of some of the guidelines, policies, and plans that may be relevant to the environmental assessment of this proposal.

ATTACHMENT 1

Technical and Policy Guidelines

The following guidelines may assist in the preparation of the environmental impact statement. This list is not exhaustive and not all of these guidelines may be relevant to your proposal.

Many of these documents can be found on the following websites:

<https://www.planningportal.nsw.gov.au/major-projects/assessment/policies-and-guidelines>

<http://www.australia.gov.au/publications>

<http://www.epa.nsw.gov.au/>

<http://www.environment.nsw.gov.au/>

<http://www.dpi.nsw.gov.au/>

Policies, Guidelines & Plans	
Aspect	Policy / Methodology
State Significant Development Guidelines	
	State Significant Assessment Guidelines (DPIE, 2021)
	Undertaking Engagement Guide – Guidance for State Significant Projects (DPIE, 2021)
	Cumulative Impact Assessment Guidelines for State Significant Projects (DPIE, 2021)
	Planning Circular PS24-002: Changes to how development costs are calculated for planning purposes
	Standard Form of Estimated Development Cost (State significant projects) – March 2024
Air Quality	
Air Quality	Protection of the Environment Operations (Clean Air) Regulation 2022
	Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales (EPA, 2022)
	Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (EPA, 2022)
Odour	Assessment and Management of Odour from Stationary Sources in NSW (DEC 2006)
Greenhouse Gas	AGO Factors and Methods Workbook (AGO, 2018)
	Guidelines for Energy Savings Action Plans (DEUS, 2005)
	National Greenhouse and Energy Reporting Scheme Measurement, Technical Guidelines for the estimation of emissions by facilities in Australia (Department of the Environment and Energy (DoEE), 2017)
	National Greenhouse Accounts Factors (DoEE, 2019)
Biodiversity	
	<i>Biodiversity Conservation Act 2016</i>
	Biodiversity Assessment Method (EES, 2021)
	Guidelines for Controlled Activities on Waterfront Land (NRAR, 2018)
	Developments adjacent to National Parks and Wildlife Service lands (DPIE, 2020)
Bush Fire	
	Planning for Bush Fire Protection (RFS, 2019)
Climate Change	
	EPA Climate Change Policy (EPA, 2023)
	Net Zero Plan Stage 1: 2020-2030 (DPIE, 2020)
Design Quality	
	Greener Places (Government Architect NSW, 2020)
	Better Placed (Government Architect NSW, 2017)

Policies, Guidelines & Plans	
Aspect	Policy / Methodology
	NSW SDRP: Guidelines for Project Teams (GANSW Advisory Note, V3 2522/2020)
Fire Safety	Fire Safety Guidelines – Fire Safety in Waste Facilities (FRNSW, 2020)
Flooding	Flood Impact and Risk Assessment Flood Risk Management Guide (LU01) (DPE, 2022) Department of Planning and Environment Flood Risk Management Toolkit – https://www.environment.nsw.gov.au/topics/water/floodplains/floodplain-guidelines
Hazards and Risk	State Environmental Planning Policy (Resilience and Hazards) 2021 Applying SEPP 33 – Hazardous and Offensive Development Application Guidelines (DoP, 2011) Assessment Guideline: Multi-level Risk Assessment (Planning and Infrastructure, 2011)
Heritage	<i>Heritage Act 1977</i> NSW Heritage Manual (HO and DUAP, 1996) The Burra Charter (ICOMOS Australia, 2013) Statements of Heritage Impact (HO and DUAP, 2002)
Non-Aboriginal Heritage	Code of Practice for the Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW, 2010) Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (DECCW, 2011) Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (DECCW, 2010)
Aboriginal Heritage	
Human Health Risk	Environmental Health Risk Assessment: Guidelines for assessing human health risks from environmental hazards (enHealth, 2012)
Noise and Vibration	Approved methods for measurement and analysis of environmental noise in NSW (EPA, 2022) Acoustics – Description and measurement of environmental noise (AS1055:2018) Noise Policy for Industry (EPA, 2017) NSW Road Noise Policy (DECCW, 2011) Noise Criteria Guideline (RMS, 2015) Noise Mitigation Guideline (RMS, 2015) Interim Construction Noise Guideline (DECC, 2009) Assessing Vibration: A Technical Guide (DEC, 2006) Noise Guide for Local Government (EPA, 2013)
Social	Social Impact Assessment Guideline for State Significant Projects (DPIE, 2021)
Soils and Water	Managing Urban Stormwater: Soils & Construction (Landcom, 2004) Soil and Landscape Issues in Environmental Impact Assessment (DLWC, 2000) Wind Erosion – 2 nd Edition (DIPNR, 2003)
Erosion and Sediment	

Policies, Guidelines & Plans

Aspect	Policy / Methodology
Groundwater	Groundwater assessment toolbox for major projects in NSW - Overview document Technical guideline (DPE, 2022)
	Guidelines for Groundwater Documentation for SSD/SSI Projects Technical guideline (DPE, 2022)
	Minimum Groundwater Modelling Requirements for SSD/SSI Projects, Technical guideline (DPE, 2022)
	Cumulative Groundwater Impact Assessment Approaches Information paper (DPE, 2022)
	National Water Quality Management Strategy Guidelines for Groundwater Protection in Australia (ARMCANZ/ANZECC, 2000)
	NSW State Groundwater Policy Framework Document (DLWC, 1997)
	NSW Aquifer Interference Policy (NOW, 2012)
	Water Sharing Plan for the Greater Metropolitan Region Groundwater Sources (NOW, 2011)
Stormwater	Storing and Handling Liquids: Environmental Protection (DECC, 2007)
	Managing Urban Stormwater: Strategic Framework. Draft (EPA, 1996)
	Managing Urban Stormwater: Council Handbook. Draft (EPA, 1997)
	Managing Urban Stormwater: Treatment Techniques (DEC, 2006)
	Managing Urban Stormwater: Source Control. Draft (EPA, 1998)
Wastewater	Managing Urban Stormwater: Harvesting and Reuse (DEC, 2006)
	National Water Quality Management Strategy: Guidelines for Sewerage Systems – Effluent Management (ARMCANZ/ANZECC, 1997)
	National Water Quality Management Strategy: Guidelines for Sewerage Systems – Use of Reclaimed Water (ARMCANZ/ANZECC, 2000)
	National Water Quality Management Strategy – Guidelines for Water Recycling: Managing Health and Environmental Risks (Phase 1) (EPHC, NRMMC & AHMC, 2006)
Contamination	National Water Quality Management Strategy – Guidelines for Water Recycling: Managing Health and Environmental Risks (Phase 2) (EPHC, NRMMC & AHMC, 2009)
	State Environmental Planning Policy (Resilience and Hazards) 2021
	Managing Land Contamination Planning Guidelines, SEPP 55 – Remediation of Land (DUAP & EPA, 1998)
	Consultants reporting on contaminated land: Contaminated Land Guidelines (EPA, 2020)
Traffic, Transport and Access	
	<i>Roads Act 1993</i>
	State Environmental Planning Policy (Transport and Infrastructure) 2021
	Guide to Traffic Generating Development (RTA, 2002 as updated)
	Road Design Guide (RMS, 2015-2017)
	Guide to Traffic Management – Pt 12: Traffic Impacts of Development (Austroads, 2016)
	Guidelines for Planning and Assessment of Road Freight Access in Industrial Areas (Austroads, 2014)
	Bicycle Parking Facilities: Guidelines for Design and Installation (AS 2890.3:2015)
	Integrated Public Transport Service Planning Guidelines: Sydney Metropolitan Area (TfNSW, 2013)
	Future Transport Strategy 2056 (TfNSW, 2018)
	Greater Sydney Services and Infrastructure Plan (TfNSW, 2018)
	NSW Freight & Ports Plan 2018-2023 (TfNSW, 2018)

Policies, Guidelines & Plans	
Aspect	Policy / Methodology
Upper Canal and Warragamba Pipeline Corridors	
	Guidelines for Development Adjacent to the Upper Canal and Warragamba Pipelines (WaterNSW, 2018)
Visual	Control of Obtrusive Effects of Outdoor Lighting (AS 2482)
Waste	NSW Waste and Sustainable Material Strategy 2041 (EPA, 2021) NSW Plastics Action Plan (EPA, 2021) NSW Energy from Waste Policy Statement (EPA, 2021) NSW Energy from Waste Infrastructure Plan (2021) The National Waste Policy: Less Waste More Resources 2018 Waste Classification Guidelines (EPA, 2014) Environmental guidelines: Composting and Related Organics Processing Facilities (DEC, 2004) Environmental guidelines: Use and Disposal of Biosolid Products (EPA, 1997) Composts, soil conditioners and mulches (Standards Australia, AS 4454) Standards for Managing Construction Waste in NSW (EPA, 2018)
Waterways	Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning (OEH, 2017) Guidelines for controlled activity approvals - https://water.dpie.nsw.gov.au/our-work/licensing-and-trade/controlled-activity-approvals/guidelines

ATTACHMENT 2
Government Authority Advice