



Environmental Impact Statement

Proposed Warehouse and Logistics Hub

5 and 9 Culverston Road, Minto

Lot 3 in DP 817793 and Lot 400 in DP 875711

Prepared by Willowtree Planning Pty Ltd on behalf
of Minto Properties Pty Ltd

June 2016

Environmental Impact Statement
Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

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Environmental Impact Statement

Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

CLAUSE 78A(8A) CERTIFICATE

Declaration Form

Submission of Environmental Impact Statement (EIS)

prepared under the *Environmental Planning and Assessment Act 1979*

Clause 78A(8A)

EIS Prepared By

Name	Andrew Cowan
Qualifications	Bachelor of Urban and Regional Planning, UNE Master of Property Development, UTS
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In Respect Of

Proposed Warehouse and Logistics Hub

Development Application

Applicant Name	Michael Yiend (Minto Properties Pty Ltd)
Address	Level 15, 124 Walker Street North Sydney NSW 2060

Land to be Developed

5 and 9 Culverston Road, Minto:

- Lot 3 in DP 817793 and Lot 400 in DP 875711

EIS

An Environmental Impact Statement (EIS) is attached.

Certificate

I certify that I have prepared the contents of this EIS and to the best of my knowledge:

- it is in accordance with Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*,
- contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure to which the statement relates, and
- that the information contained in the statement is neither false nor misleading.

Signature

Name	Andrew Cowan
Qualification	BURP, UNE MPD, UTS
Date	3 June 2016

TABLE OF CONTENTS

GLOSSARY OF TERMS	VI
EXECUTIVE SUMMARY	VII
PART A PRELIMINARY	1
1.1 INTRODUCTION	1
1.2 PROJECT TEAM	1
1.3 SITE HISTORY	2
1.4 THE PROPONENT	2
1.5 CAPITAL INVESTMENT VALUE	2
1.6 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS	3
PART B SITE ANALYSIS	1
2.1 SITE LOCATION & EXISTING SITE CHARACTERISTICS	1
2.2 LAND OWNERSHIP	3
2.3 SITE CONTEXT	3
2.4 SITE SUITABILITY	3
PART C PROPOSED DEVELOPMENT	5
3.1 OBJECTIVES OF THE PROPOSAL	5
3.2 DESCRIPTION OF THE PROPOSAL	5
3.2.1 WAREHOUSE AND LOGISTICS HUB	5
3.2.2 STAGING OF WORKS	6
	6
3.2.3 SITE PREPARATION	8
3.2.4 DRAWINGS	8
3.2.5 SUPPORTING DOCUMENTS	10
3.3 PROJECT NEED	10
3.4 CONSIDERATION OF ALTERNATIVES	11
PART D LEGISLATIVE AND POLICY FRAMEWORK	12
4.1 ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979	12
4.2 PROTECTION OF THE ENVIRONMENT OPERATIONS ACT 1997	12
4.3 THREATENED SPECIES CONSERVATION ACT 1995	12
4.4 NSW 2021: A PLAN TO MAKE NSW NUMBER ONE	13
4.5 A PLAN FOR GROWING SYDNEY	13
4.6 STATE ENVIRONMENTAL PLANNING POLICY (STATE AND REGIONAL DEVELOPMENT) 2011	14
4.7 STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE) 2007	14
4.8 STATE ENVIRONMENTAL PLANNING POLICY NO. 33 – HAZARDOUS AND OFFENSIVE DEVELOPMENT	15
4.9 STATE ENVIRONMENTAL PLANNING POLICY NO. 55 – REMEDIATION OF LAND	15
4.10 CAMPBELLTOWN LOCAL ENVIRONMENTAL PLAN 2015	17
4.11 CAMPBELLTOWN (SUSTAINABLE CITY) DEVELOPMENT CONTROL PLAN 2015	21

Environmental Impact Statement
Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

PART E	CONSULTATION	23
PART F	ENVIRONMENTAL RISK ASSESSMENT	25
6.1	SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS	25
6.2	STRATEGIC & STATUTORY CONTEXT	25
6.3	TRAFFIC AND TRANSPORT	25
6.4	URBAN DESIGN AND VISUAL	30
6.5	NOISE AND VIBRATION	32
6.6	SOILS AND WATER	37
6.7	AIR QUALITY	47
6.8	INFRASTRUCTURE REQUIREMENTS	48
6.9	ECOLOGICALLY SUSTAINABLE DEVELOPMENT AND GREENHOUSE GAS AND ENERGY EFFICIENCY	51
6.10	WASTE	53
6.11	CONTRIBUTIONS	60
6.12	MINERAL RESOURCES	61
6.13	HERITAGE	61
PART G	DRAFT MANAGEMENT AND MITIGATION MEASURES	65
PART H	PROJECT JUSTIFICATION	69
PART I	CONCLUSION	70

Figures

Figure 1: Subject Site (SIX Maps, 2016)	2
Figure 2: Subject Site (SIX Maps, 2016)	2
Figure 3: Site Context (Google Maps, 2016)	3
Figure 4: Site Masterplan (Overall) (Reid Campbell 2016)	6
Figure 5: Top to bottom - perspectives from Cnr of Airds Road/ Rose Payten Drive, Airds Road & Culverston Road/Airds Road	7
Figure 6: Cut and Fill Plan	8
Figure 7: Zoning Map (Source: NSW Legislation 2016)	18
Figure 8: Minimum Subdivision Lot Size Map (Source: NSW Legislation 2016)	19
Figure 9: Height of Buildings Maps (Source: NSW Legislation 2016)	20
Figure 10: Flood Level Locations	39
Figure 11: 100 year and probable maximum flood (PMF) levels	40
Figure 12: MUSIC Model Layouts for Existing and Proposed Conditions	43
Figure 13: Site Water Balance for Existing and Proposed Conditions	44
Figure 14: Heritage Items	63

Tables

Table 1: Proponent Details	2
Table 2: How SEARs have been satisfied	3
Table 3: Proposed Development Particulars	5
Table 4: Proposed Staging	6
Table 5: Cut to Fill Volumes	8
Table 6: Drawing Schedule	8

Environmental Impact Statement

Proposed Warehouse and Logistics Hub

5 and 9 Culverston Road, Minto

Table 7: Document Schedule	10
Table 8: A Plan for Growing Sydney - Strategic Directions	14
Table 9: SEPP 64 Criteria.....	15
Table 10: Campbelltown (Sustainable City) Development Control Plan 2015	22
Table 11: Consultation Record.....	23
Table 12: Peak Hourly and Daily Person Trips by Transport Mode.....	26
Table 13: Comparison of Future to Existing Road Network Performance	27
Table 14: Car Parking Requirement	27
Table 15: Cut to Fill Volumes	32
Table 16: Construction Works and Equipment Sound Power Levels.....	33
Table 17: Predicted LAeq Construction Noise Levels – Phase 1	34
Table 18: Predicted LAeq Construction Noise Levels – Phases 2 & 3	34
Table 19: Predicted LAeq Construction Noise Levels – Phase 4	34
Table 20: Typical Vibration Emission Levels from Construction Plant	35
Table 21: Predicted LAeq(15 minute) Operational Noise Levels at Residential Receivers	36
Table 22: Predicted LA1(60 second) Operational Noise Levels at Residential Receivers	36
Table 23: Existing and Projected Peak Traffic Flows and Relative Noise Level Increase.....	37
Table 24: Main Waterways 100 year ARI Water Levels.....	38
Table 25: Existing and Proposed Average Annual Pollutant Loads.....	43
Table 26: Estimation of load requirements per service	50
Table 27: Summary of Power Demands.....	51
Table 28: Estimated annual energy consumption from the office lighting.....	52
Table 29: Estimated annual energy consumption from the office lighting.....	52
Table 30: Waste generated during operations.....	54
Table 31: Waste generated during operations.....	57
Table 32: Potential Waste Impacts.....	58
Table 33: Waste Management Mitigation Measures.....	59

Appendices

Appendix 1 Secretary's Environmental Assessment Requirements
Appendix 2 Quantity Surveyors Report
Appendix 3 Survey Plan
Appendix 4 Architectural Plans
Appendix 5 Design Statement
Appendix 6 Landscape Plan
Appendix 7 Traffic Impact Assessment
Appendix 8 Noise and Vibration Impact Assessment
Appendix 9 Civil Plans
Appendix 10 Flooding and Stormwater Report
Appendix 11 Geotechnical Investigation
Appendix 12 Air Quality Assessment
Appendix 13 Infrastructure Report
Appendix 14 Environmental Site Assessment
Appendix 15 Waste Management Assessment
Appendix 16 Aboriginal Heritage Assessment
Appendix 17 Non-Aboriginal Heritage Assessment
Appendix 18 Building Code of Australia Statement
Appendix 19 Sustainability Management Plan
Appendix 20 Light Spill Assessment
Appendix 21 Clause 4.6 Variation

GLOSSARY OF TERMS

TERM	MEANING
AU\$	Australian Dollars
Council	Campbelltown City Council
SEARs	Secretary's Environmental Assessment Requirements 10 March 2016.
DP&E	Department of Planning and Environment
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i> (as amended)
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2000</i>
Willowtree Planning	Willowtree Planning Pty Ltd
NSW 2021	<i>NSW 2021: A Plan to Make NSW Number One</i>
OEH	NSW Office of Environment and Heritage
SEPP	State Environmental Planning Policy
Sqm or m²	Square metres
SREP	Sydney Regional Environmental Plan
SSD	State Significant Development
The Site	5 and 9 Culverston Road, Minto (Lot 3 in DP 817793 and Lot 400 in DP 875711)

EXECUTIVE SUMMARY

Willowtree Planning Pty Ltd (Willowtree Planning) on behalf of Minto Properties Pty Ltd has prepared this Environmental Impact Statement (EIS). The proposal seeks consent for the construction and use of a Warehouse and Logistics Hub on land identified as 5 and 9 Culverston Road, Minto. The proposed Warehouse and Logistics Hub will include four (4) warehouses with ancillary offices, loading docks, car parking and site landscaping as well as external storage areas. In order to facilitate this built form development, consent is also sought for bulk earthworks across the site and the provision of infrastructure and services. It is proposed to undertake the development over three (3) stages.

The site is owned by Minto Properties and is located within an existing industrial precinct with strategic access to Sydney's key arterial road network. The proposal will retain the use of the site for employment-generating purposes by facilitating the operation of the site for the storage and distribution of freight. Accordingly the proposal will create employment opportunities and service businesses that operate on a local and national scale.

The site is located within the Campbelltown Local Government Area (LGA) and is identified within the IN1 General Industrial Zone pursuant to *Campbelltown Local Environmental Plan 2015* (CLEP 2015). The proposed development for a *Warehouse and Distribution Centre* is permissible with consent on the subject site and will be contextually appropriate given the existing industrial character of the site and its surrounds.

The process of applying for State Significant Development (SSD) requires that the Capital Investment Value (CIV) be greater than AU\$50 Million for Warehouses or Distribution Centres. Under the *Environmental Planning and Assessment Act 1979* (the EP&A Act) it is required that a request for Secretary's Environmental Assessment Requirements (SEARs) be made prior to lodgement of an application seeking approval. SEARs were requested for the proposed development (Reference: SSD-7500) and subsequently issued by the Department of Planning and Environment (DP&E) on 10 March 2016 (refer **Appendix 1**).

In addition to the general requirements, the SEARs for the proposal outline a number of Key Issues to be addressed as part of this EIS, including:

- Strategic and Statutory Context;
- Traffic and Transport;
- Urban Design and Visual;
- Noise and Vibration;
- Soils and Water;
- Air Quality;
- Infrastructure Requirements;
- Greenhouse Gas and Energy Efficiency;
- Ecologically Sustainable Development;
- Waste;
- Contributions; and
- Mineral Resources.

The findings of this EIS identify that the proposal can be accommodated subject to suitable mitigation measures without any adverse environmental impacts beyond that considered appropriate by the relevant legislation.

Further, the proposed Warehouse and Logistics Hub will be consistent with the objectives of *Campbelltown Local Environmental Plan 2015* and relevant IN1 General Industrial zone. Based on the findings of this EIS, the proposal supports the continued use of the site for industry, providing employment opportunities in Western Sydney. The proposal is suitable for

Environmental Impact Statement
Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

the local context and shall not result in any significant environmental impact. As such, it is recommended that the proposal be supported by the DP&E for approval.

PART A PRELIMINARY

1.1 INTRODUCTION

This Environmental Impact Statement has been prepared by Willowtree Planning, on behalf of the Proponent, Minto Properties Pty Ltd, and is submitted to the NSW South Wales Department of Planning and Environment in support of development on the site identified as 5 and 9 Culverston Road, Minto (Lot 3 in DP 817793 and Lot 400 in DP 875711).

This application seeks consent for the construction and use of a Warehouse and Logistics Hub on an IN1 General Industrial zoned site that is situated within an established industrial precinct. The proposal for a Warehouse and Logistics Hub for the storage and distribution of freight will preserve the use of the site for employment-generating development and will support businesses that operate on a local and national scale. Specifically the proposal entails bulk earthworks, provision of infrastructure and services, the staged construction of four (4) warehouses with ancillary offices, loading docks, car parking and site landscaping and the provision of external storage hardstand areas.

The proposed Warehouse and Logistics Hub will operate on a 24/7 basis with operations relating to the storage and distribution of freight. As discussed throughout this EIS, the proposal seeks to establish an innovative operation that will benefit businesses that operate on a local and national scale.

This EIS describes the site and proposed development, provides relevant background information, responds to the SEARs and assesses the proposed development in terms of the relevant matters set out in relevant legislation, environmental planning instruments and planning policies.

The structure of the EIS is as follows:

- Part A Preliminary
- Part B Site Analysis
- Part C Proposed Development
- Part D Legislative and Policy Framework
- Part E Consultation
- Part F Environmental Risk Assessment
- Part G Management and Mitigation Measures
- Part H Project Justification
- Part I Conclusion

1.2 PROJECT TEAM

The Project Team involved in the preparation of this application are:

- Minto Properties Pty Ltd (Applicant)
- Tactical Group (Project Manager)
- Willowtree Planning Pty Ltd (Planning Consultant)
- Rider Levitt Bucknall (Quantity Surveyor)
- Cardno Hard and Forrester (Surveyor)
- Reid Campbell (Architectural Consultant)
- Groundlink (Landscape Consultant)
- Ason (Traffic Consultant)
- Wilkinson Murray (Noise, Vibration and Air Quality Consultant)
- Arcadis (Civil Engineering Consultant, Flooding, Stormwater, Infrastructure, Environmental and Waste Management Consultant)
- Golder Associates (Geotechnical Engineer and Environmental Consultant)

Environmental Impact Statement

Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

- Artefact Heritage (Heritage Consultant)
- McKenzie Group (Building Surveying Consultant)

1.3 SITE HISTORY

The site has been historically used for industry and is currently used for the storage and processing of motor vehicles. The result of the former and current land use is a site that has been predominantly cleared of vegetation and comprises concrete hardstand, asphalt spray seal, shade structures and warehouse buildings. The site also includes two existing earthen bunds running north-south, parallel to Culverston Road, associated with the historical and current use of the site. To enable the current use of the site, a creek running through the site was backfilled sometime between 1984-1990. Given the extensive earthworks, vegetation clearing and construction activities that have been undertaken on the site, it is heavily modified and disturbed.

Prior to the above-described recent site history associated with the industrial use of the land, the site initially formed part of an agricultural land holding totalling 1300 acres of land and was owned by Thomas Rose. The land changed owners and was subdivided over a number of years however significant development of the site was not undertaken until the mid-twentieth century. While the site remained undeveloped in 1978, an aerial photo from the time shows urbanisation of Minto, the industrialisation of land in the vicinity of the site and new residential development to the east, south and south-west. This photograph is provided on page 15 of the Non-Aboriginal Heritage Assessment at **Appendix 17**.

1.4 THE PROPONENT

The proponent is Minto Properties Pty Ltd. See **Table 1** for contact details.

Table 1: Proponent Details	
Contact Name	Steve Ryan
Company Details	Minto Properties Pty Ltd C/O Tactical Group Level 15, 124 Walker Street North Sydney NSW 2060
Contact Number	+61 2 8907 0700

1.5 CAPITAL INVESTMENT VALUE

The capital investment of this project is **\$141,550,000** subject to final costing and tender clarifications (**Appendix 2**).

1.6 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

Application to receive SEARs was submitted to DP&E (Reference: SSD-7500) and were subsequently issued on 10 March 2016.

The SEARs issued are annexed as **Appendix 1**. An overview of how the requirements have been satisfied within the EIS is outlined in **Table 2**. This document is also consistent with the minimum requirements for Environmental Impact Statements in clauses 6 and 7 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*.

Table 2: How SEARs have been satisfied	
General Requirements	Satisfied by...
The Environmental Impact Statement (EIS) for the development must meet the form and content requirements in Clauses 6 and 7 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000.	This EIS has been prepared in accordance with Clauses 6 and 7 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000. The structure of this document addresses all legislative requirements.
<i>In addition, the EIS must include:</i>	
- Detailed descriptions of the development, including: - Need for the proposed development; - Justification for the proposed development; - Likely staging of the development; - Likely interactions between the development and existing, approved and proposed operations in the vicinity of the site; and - Plans of any proposed building works.	Section 3.3 addresses the need of the proposed development. Part H provides justification for the proposed development. Section 3.2.2 identifies the indicative staging. Part F addresses the environmental impacts of the development. Plans of the proposed building works are included at Appendix 4.
Consideration of all relevant environmental planning instruments, including identification and justification of any inconsistencies within these instruments;	Relevant environmental planning instruments are addressed in Part D .
Risk assessment of the potential environmental impacts of the development, identifying the key issues for further assessment;	An environmental risk assessment is provided in Part F .
- Detailed assessment of the key issues specified below, and any other significant issues identified in the risk assessment, which includes: - A description of the existing environment, using sufficient baseline data; - An assessment of the potential impacts of all stages of the development, including any cumulative impacts, taking into consideration relevant guidelines, policies, plans and statutes; and - A description of the measures that would be implemented to avoid, minimise, mitigate and if necessary, offset the potential impacts of the	Part B addresses the existing environment, while a strategic overview is provided in Part D. The environmental risk assessment in Part F assesses in detail the potential impact of the development.

Environmental Impact Statement
Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

<i>development, including proposals for adaptive management and/or contingency plans to manage significant risks to the environment; and</i>	Part G provides draft Management and Mitigation Measures for the proposal whilst the recommendations of the reports provided at Appendices 1-20 provide further measures to avoid any adverse impact.
▪ <i>Consolidated summary of all the proposed environmental management and monitoring measures, highlighting commitments included in the EIS</i>	Part G provides Management and Mitigation Measures for the proposal.
<i>The EIS must also be accompanied by a report from a qualified quantity surveyor providing:</i> ▪ <i>A detailed calculation of the capital investment (CIV) of the proposal as defined in clause 3 of the Environmental Planning and Assessment Regulation 2000, including details of all components of the CIV; and</i> ▪ <i>An estimate of the jobs that will be created by the development during the construction and operational phases of the development; and</i> ▪ <i>Certification that the information provided is accurate at the date of the presentation.</i>	A calculation of the Capital Investment Value in accordance with the EP&A Regulation 2000 is provided at Appendix 2.
Key Issues	
<i>The EIS must address the following specific matters:</i> ▪ <i>Strategic and Statutory Context – including:</i> - <i>Detailed justification for the proposal and the suitability of the site; and</i> - <i>Demonstration that the proposal is generally consistent with all relevant planning strategies, environmental planning instruments and development control plans (DCPs) and justification for any inconsistencies.</i>	The strategic and statutory context is addressed in Part D. Part H provides justification for the proposed development.

Environmental Impact Statement
Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

▪ <i>Urban Design and Visual – including:</i> - <i>Layout of the development including staging, site coverage, setbacks, proposed open space and landscaped areas;</i> - <i>Suitable landscaping incorporating endemic species;</i> - <i>The layout and design of the development having regard to the surrounding vehicular, pedestrian and cycling networks, if applicable;</i> - <i>A detailed assessment (including photomontages and perspectives) of the facility (buildings and storage areas) including height, colour, scale, bulk, building materials and architectural treatments and finishes, signage, lighting and any retaining walls particularly from nearby public receivers and significant vantage points within the broader public domain;</i> - <i>Proposed cut and fill works associated with the development; and</i> - <i>Measures to minimise the extent of cut and fill.</i>	Urban Design and Visual Impacts associated with the proposal are addressed in Section 6.4. The design and layout of the development are also clearly shown in the Architectural Plans at Appendix 4 and described in the Design Statement at Appendix 5, whilst landscape design is detailed in the Landscape Plans at Appendix 6 and proposed earthworks and retaining walls are addressed in the Civil Plans at Appendix 9.
▪ <i>Noise and Vibration – including:</i> - <i>A description of all potential noise and vibration sources such as construction, operational, on and off-site traffic noise;</i> - <i>A noise impact assessment that considers the cumulative noise impact of the proposed development in accordance with relevant Environment Protection Authority guidelines; and</i> - <i>Details of noise mitigation, management and monitoring measures.</i>	Noise and vibration are addressed in Section 6.5 and Appendix 8.
▪ <i>Soils and Water – including:</i> - <i>A description of the water demands and a breakdown of water supplies;</i> - <i>A description of the measures to minimise water use;</i> - <i>A detailed water balance;</i> - <i>A description of all wastewater generated on-site;</i> - <i>A description of the proposed erosion and sediment controls during construction and operation;</i> - <i>A description of the surface and stormwater management system, including on-site detention, and measures to treat or re-use water;</i> - <i>An assessment of potential surface and groundwater impacts associated with the development;</i> - <i>An assessment of the impact of flooding on the proposed development for the full range of flood events up to the probable maximum flood;</i> - <i>An assessment of the impact of the proposed development on flood behavior; and</i> - <i>Details of impact mitigation, management and monitoring measures.</i>	Soil and Water are addressed in Section 6.7, the Flooding and Stormwater Report at Appendix 10, the Geotechnical Investigation at Appendix 11 and the Environmental Site Assessment at Appendix 14.
▪ <i>Air Quality – including:</i> - <i>An assessment of the air quality impacts at private properties during construction and operation of the development, in accordance with relevant Environment Protection Authority guidelines; and</i> - <i>Details of mitigation, management and monitoring measures for preventing and/or minimising emissions.</i>	Air Quality is addressed in Section 6.7 and the accompanying Air Quality Assessment at Appendix 12.
▪ <i>Infrastructure Requirements – including:</i>	Infrastructure required to

Environmental Impact Statement
Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

- A detailed written and/or geographical description of the existing infrastructure required on the site; - Identification of any infrastructure upgrades required to facilitate the development, and describe any arrangements to ensure that the upgrades will be implemented in a timely manner and maintained; and - A detailed description of cooling/heating systems to be installed on-site.	service the site is addressed in Section 6.8 and the Infrastructure Report at Appendix 13 .
▪ Greenhouse Gas and Energy Efficiency – including an assessment of the energy use on site, and demonstrate what measures would be implemented to ensure the proposal is energy efficient.	Measures to achieve energy efficiency are detailed in Section 6.9 and the Sustainability Management Plan at Appendix 19 .
▪ Ecologically Sustainable Development – including an assessment of how the development will incorporate ecologically sustainable development principles in all phases of the development.	The incorporation of principles of Ecologically Sustainable Development in the proposal are detailed in Section 6.9 and Appendix 19 .
▪ Waste – including: - Details of the quantities and classification of all waste streams to be generated on site; - Details of waste storage, handling and disposal; and - 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 Avoidance and Resource Recovery Strategy 2014-2021.	Waste management is addressed in Section 6.10 and the accompanying report at Appendix 15 .
▪ Contributions – including: - Consideration of Council's Section 94/94A Contribution Plan and/or details of any Voluntary Planning Agreement	Contributions applicable to the site are addressed in Section 6.11 .
▪ Mineral Resources – including: - An assessment of the potential impacts of the proposed development on any significant mineral resources.	Mineral resources are addressed in the Geotechnical Investigation at Appendix 11 and in Section 6.12 .
Plans and Documents	
The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the Environmental Planning and Assessment Regulation 2000. You should provide these as part of the EIS rather than as separate documents.	All documentation is in accordance with Schedule 1 of the EP&A Regulation 2000.
Consultation	
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. In particular you must consult with: ▪ Campbelltown City Council; ▪ Environment Protection Authority; ▪ Office of Environment and Heritage; ▪ Department of Primary Industries; ▪ Department of Industry – Resources and Energy; ▪ Transport for NSW;	Consultation has been carried out as documented in Part E and Appendix 20 .

Environmental Impact Statement

Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

- *Roads and Maritime Services;*
- *Sydney Water; and*
- *local residents and stakeholders.*

The EIS must describe the consultation process and the issues raised, and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.

PART B SITE ANALYSIS

2.1 SITE LOCATION & EXISTING SITE CHARACTERISTICS

The subject site is identified as 5 and 9 Culverston Road, Minto, being legally described as Lot 3 in DP 817793 and Lot 400 in DP 875711. The entire site exhibits an area of approximately 29.63ha.

The site has been historically developed for industry and is currently used for a vehicle storage and processing facility and presently employs 150 staff (including those for admin and manual labour purposes). Prixcar (the existing operator) services principally include vehicle storage, vehicle processing, pre-delivery inspection and detailing, accessory fitting, fleet build-up and design, paint and panel rectification, showroom and event detailing, event organisation and vehicle preparation and car transport and relocation.

Existing attributes of the site are noted as follows:

- Existing development on the site comprises hardstand, shade structures, a main warehouse building and several small detached buildings.
- The site is generally clear of vegetation, with the exception of planting adjacent to the site boundaries.
- The topography of the site is characterized by a gradual fall from the south-east to north-western corners of the site.
- Existing services including sewerage, electricity and water, are located throughout the site and concentrated in the immediate vicinity of Culverston Road. Drainage systems are located predominantly adjacent to the site boundaries and Culverston Road. Two (2) Telstra pits are located under Culverston Road in the northern part of the site.
- Access is obtained via Culverston Road from the round-about intersection of Culverston Road and Airs Road.
- The site's eastern boundary corresponds with a drainage corridor and the Main Southern Railway line while the site's western boundary corresponds with the Bow Bowling Canal. The site's northern and southern boundaries also correspond with drainage channels.

The site exhibits three (3) street frontages being Airs Road to the north and west and Rose Payten Drive to the south which is elevated in respect of the site. The site is also transected by Culverston Road running north-west through the northern and central portions of the site. To the east, the site adjoins a drainage corridor and the Main Southern Railway line.

The subject site is surrounded by similar industrial and warehouse development and is in reasonable proximity of Pembroke Park, the Campbelltown Sports Stadium and other recreational infrastructure. The nearest residential development is located approximately 300m to the west of the site and comprises low-density suburbs.

Figures 1 and 2 below provide an overview of the site layout (as existing) and the surrounding land uses.

Environmental Impact Statement

Proposed Warehouse and Logistics Hub

5 and 9 Culverston Road, Minto



Figure 1: Subject Site (SIX Maps, 2016)



Figure 2: Subject Site (SIX Maps, 2016)

Environmental Impact Statement

Proposed Warehouse and Logistics Hub

5 and 9 Culverston Road, Minto

2.2 LAND OWNERSHIP

The land, which is the subject of this application, is under of ownership of Minto Properties Pty Ltd. Owner's consent authorising lodgement of this application is submitted in accompaniment to this SSDA.

2.3 SITE CONTEXT

The site is located within the Campbelltown LGA to the south-west of the Sydney metropolitan area.

The site is serviced by major transport infrastructure providing local and regional connectivity including the Hume Motorway with access facilitated in close proximity of the site. Other major road infrastructure in the general vicinity of the site includes Narellan Road (A9), Camden Bypass, Camden Valley Way and the M7.

Located approximately 50km from the Sydney CBD and 40km from Sydney Airport, the site affords access to vital infrastructure which reinforces its suitability for warehousing and logistics purposes.

The regional context of the site is shown in **Figure 3**.

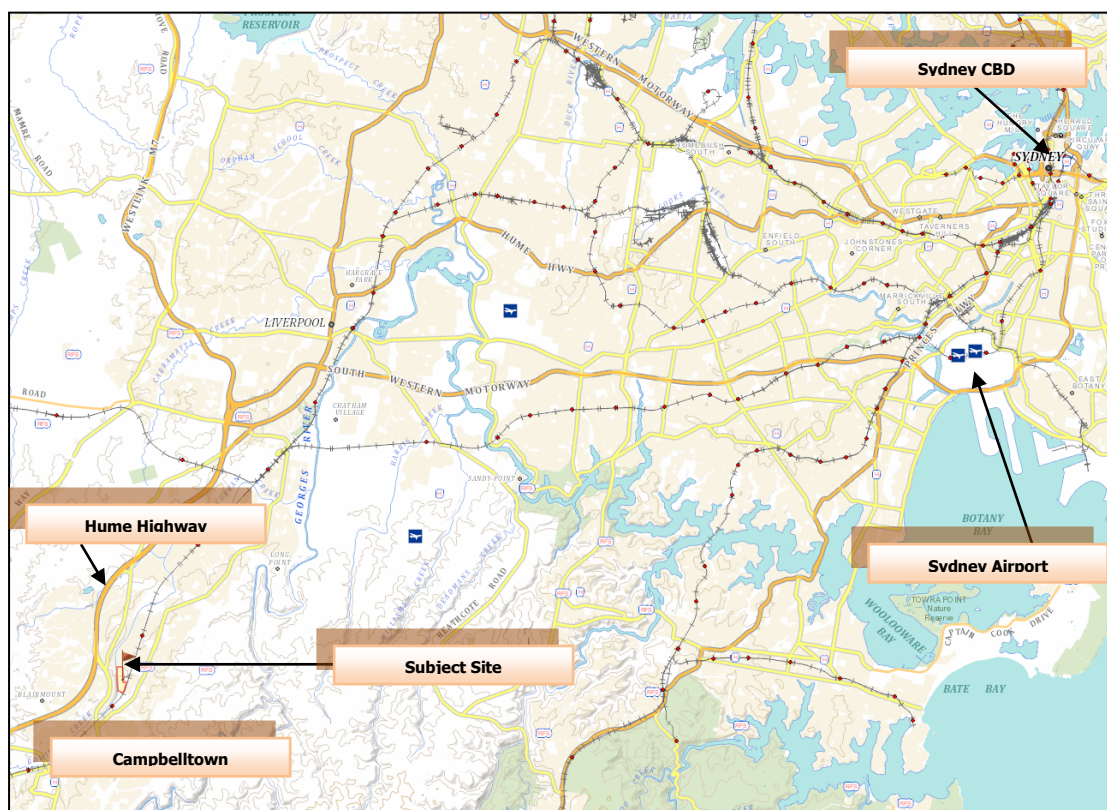


Figure 3: Site Context (Google Maps, 2016)

2.4 SITE SUITABILITY

The proposal provides for a Warehouse and Logistics Hub on a site that is suitably located from any sensitive receiving environments. As previously discussed, the site provides an unconstrained platform for development. The topography does not pose significant restrictions for future development.

In summary, the suitability of the site can be attributed to the following:

- CLEP2015 allows for the development as a permissible use;
- access to the regional road network;
- compatibility with surrounding development and local context;
- minimal impact on the environment; and
- implementation of suitable mitigation measures where required.

PART C PROPOSED DEVELOPMENT

3.1 OBJECTIVES OF THE PROPOSAL

The following objectives have been identified as forming the basis of the proposed development of the subject land to accommodate the proposed Warehouse and Logistics Hub.

- Design the site to achieve viable economic return;
- Ensure minimal environmental and amenity impact;
- Provide for employment generating land uses; and
- Ensure development is compatible with surrounding development and the local context.

The site and proposed design are considered to meet the objectives of the project as it allows for development on land that has been previously disturbed and used for industrial/warehousing purposes.

3.2 DESCRIPTION OF THE PROPOSAL

3.2.1 Warehouse and Logistics Hub

Consent is sought to develop the site for the purpose of a Warehouse Logistics Hub. Use of the facilities will be for warehousing and distribution on a 24 hour, 7 day basis, consistent with surrounding operations.

The proposed development particulars are outlined as follows:

Table 3: Proposed Development Particulars	
Site Area	29.63ha
Warehouse	Four (4) warehouses including a total of four (4) offices, loading docks and car parking. The specified approximate areas for the proposal are as follows: ▪ Warehouse 1A – 40,000sqm GFA Office – 2,000sqm GFA ▪ Warehouse 1B – 22,000sqm GFA; Office – 1,000sqm ▪ Warehouse 1C – 22,000sqm GFA; Office – 1,00sqm ▪ Warehouse 1D – 23,000sqm GFA; Office – 1,00sqm Total Building Area = 112,000sqm
Hardstand Area	69,066sqm for storage associated with warehousing and logistics.
Car Parking	481 spaces with provision for 147 additional spaces if required.
Access and Servicing	Access and servicing arrangements will be provided in accordance with the relevant Australian Standards.
Primary Land Use	Warehousing, distribution and logistics
Bulk Earthworks	Bulk earthworks are proposed to be carried out to establish building pads for the Site and balance the cut/fill.
Hours of Operation	24 hours, 7 days per week.
Subdivision	No subdivision of the site is proposed.
Infrastructure and Services	Existing infrastructure and services will be upgraded as required to service the proposed development.
Operational Jobs	300-400

Environmental Impact Statement

Proposed Warehouse and Logistics Hub

5 and 9 Culverston Road, Minto

Construction Jobs	200-300
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In addition to the above, it is noted that Culverston Road is currently under ownership of Council. Discussions with Campbelltown Council regarding the acquisition of this road are progressing separately to this application.

3.2.2 Staging of Works

The development is proposed to be undertaken in three (3) stages in accordance with **Table 4** and **Figure 4**.

Appendix 4 details the conceptual layout of the proposal.

Table 4: Proposed Staging			
Development Particular	Staging		
	Stage 1	Stage 2	Stage 3
Warehouse	1A	1B + 1C	1D
Approximate Total GFA	Warehouse 1A Warehouse: 40,000sqm GFA Office: 2,000sqm	Warehouse 1B Warehouse: 22,000sqm Office: 1,000sqm Warehouse 1C Warehouse: 22,000sqm Office: 1,000sqm	Warehouse 1D Warehouse: 23,000sqm Office: 1,000sqm
Approximate Hardstand	6.9ha for storage associated with warehousing and logistics purposes		

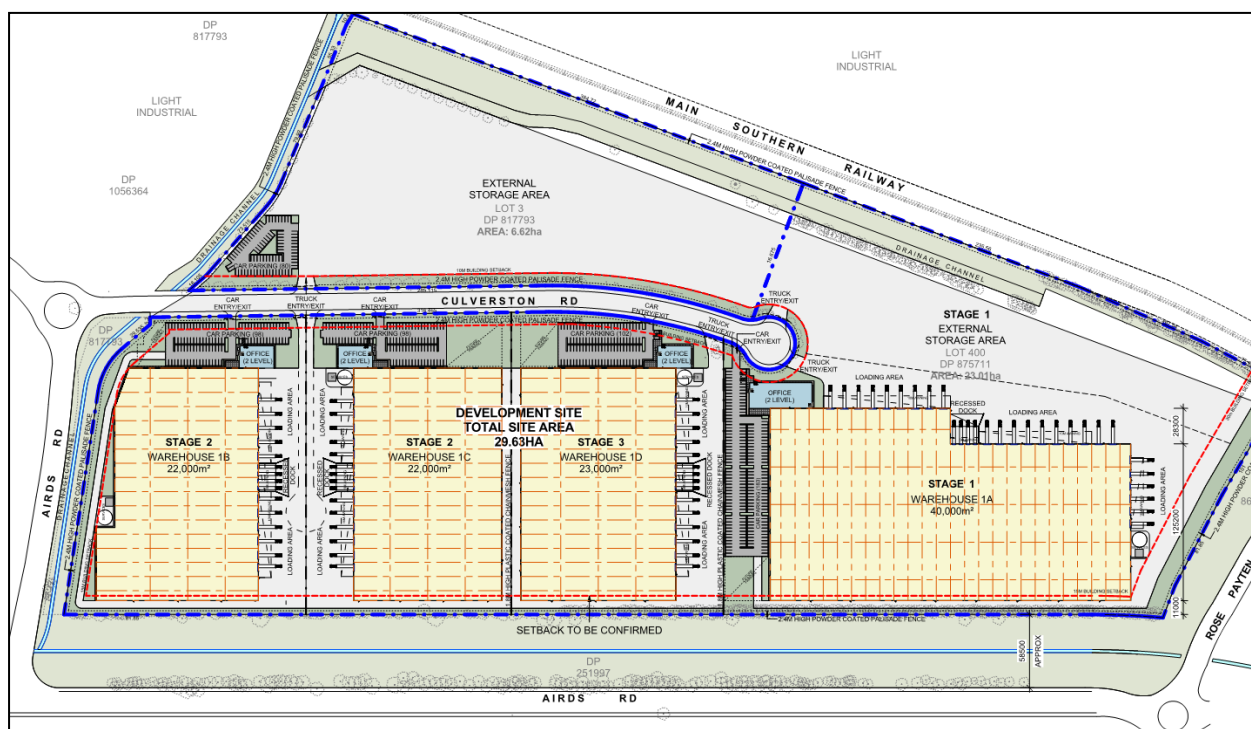


Figure 4: Site Masterplan (Overall) (Reid Campbell 2016)

Environmental Impact Statement
Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto



Figure 5: Top to bottom - perspectives from Cnr of Airds Road/ Rose Payten Drive, Airds Road & Culverston Road/Airds Road

Environmental Impact Statement

Proposed Warehouse and Logistics Hub

5 and 9 Culverston Road, Minto

3.2.3 Site Preparation

The proposal includes bulk earthworks to facilitate the proposed development. Filling is proposed across the site to create four (4) flat building pads.

Overall cut to fill volumes are summarised in **Table 5** and **Figure 6**.

Table 5: Cut to Fill Volumes	
Cut or Fill	Volume
Total Cut	- 12,350m ³
Total Fill	243,750m ³
Excess of Fill over Cut	231,400m ³

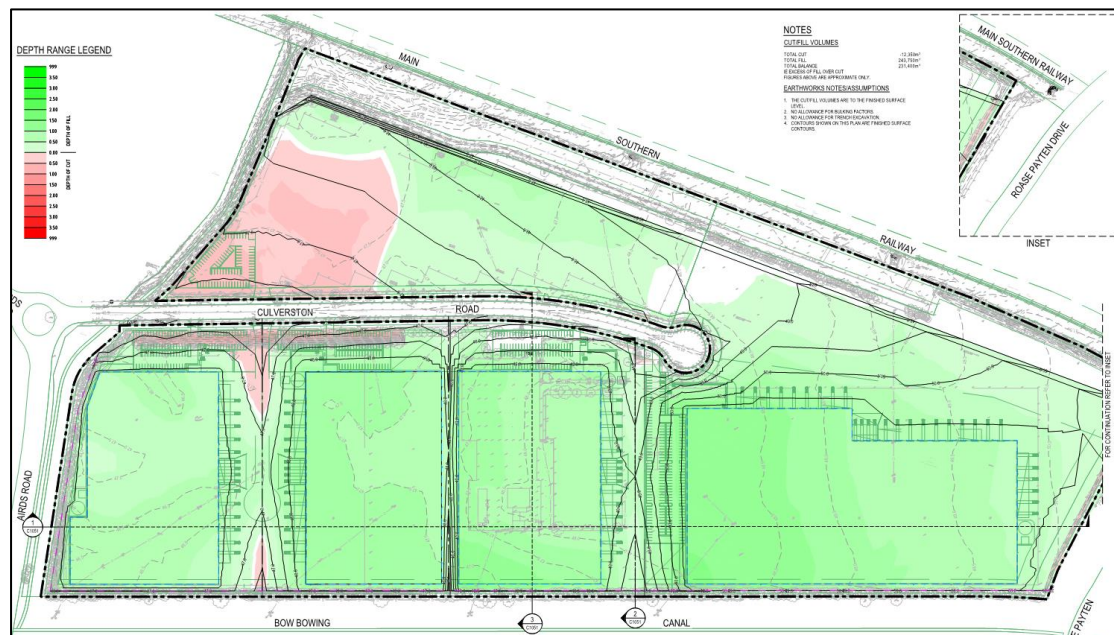


Figure 6: Cut and Fill Plan

3.2.4 Drawings

Drawings for the proposed development are outlined in **Table 6**.

Table 6: Drawing Schedule		
Drawing No.	Description	Author
A0001	COVER SHEET	Reid Campbell
A0002	LOCATION PLAN	Reid Campbell
A0003	SITE ANALYSIS - SOLAR ACCESS, VIEW CORRIDORS, LANDFORM & EXISTING INFRASTRUCTURE	Reid Campbell
A0005	DEMOLITION PLAN	Reid Campbell
A0006	SITE MASTERPLAN (OVERALL)	Reid Campbell
A0007	SITE ELEVATIONS	Reid Campbell
A0008	SITE SECTIONS	Reid Campbell
A0010	PERSPECTIVE A	Reid Campbell
A0011	PERSPECTIVE B	Reid Campbell
A0012	PERSPECTIVE C	Reid Campbell
A0013	AERIAL VIEW 1	Reid Campbell
A0014	AERIAL VIEW 2	Reid Campbell
A1001	WAREHOUSE 1A - SITE PLAN	Reid Campbell
A1002	WAREHOUSE 1A - FLOOR PLAN	Reid Campbell

Environmental Impact Statement
Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

A1003	WAREHOUSE 1A - ROOF PLAN	Reid Campbell
A1004	WAREHOUSE 1A - OFFICE FLOOR PLAN	Reid Campbell
A1005	WAREHOUSE 1A - ELEVATIONS 1	Reid Campbell
A1006	WAREHOUSE 1A - ELEVATIONS 2	Reid Campbell
A1007	WAREHOUSE 1A - SECTION AA, BB, CC	Reid Campbell
A1010	WAREHOUSE 1A - EXTERNAL FINISHES BOARD	Reid Campbell
A2001	WAREHOUSE 1B - SITE PLAN	Reid Campbell
A2002	WAREHOUSE 1B - FLOOR PLAN	Reid Campbell
A2003	WAREHOUSE 1B - ROOF PLAN	Reid Campbell
A2004	WAREHOUSE 1B - OFFICE FLOOR PLAN	Reid Campbell
A2005	WAREHOUSE 1B - ELEVATIONS 1	Reid Campbell
A2006	WAREHOUSE 1B - ELEVATIONS 2	Reid Campbell
A2007	WAREHOUSE 1B - SECTION AA, BB	Reid Campbell
A2010	WAREHOUSE 1B - EXTERNAL FINISHES BOARD	Reid Campbell
A3001	WAREHOUSE 1C - SITE PLAN	Reid Campbell
A3002	WAREHOUSE 1C - FLOOR PLAN	Reid Campbell
A3003	WAREHOUSE 1C - ROOF PLAN	Reid Campbell
A3004	WAREHOUSE 1C - OFFICE FLOOR PLAN	Reid Campbell
A3005	WAREHOUSE 1C - ELEVATIONS 1	Reid Campbell
A3006	WAREHOUSE 1C - ELEVATIONS 2	Reid Campbell
A3007	WAREHOUSE 1C - SECTION AA, BB	Reid Campbell
A3010	WAREHOUSE 1C - EXTERNAL FINISHES BOARD	Reid Campbell
A4001	WAREHOUSE 1D - SITE PLAN	Reid Campbell
A4002	WAREHOUSE 1D - FLOOR PLAN	Reid Campbell
A4003	WAREHOUSE 1D - ROOF PLAN	Reid Campbell
A4004	WAREHOUSE 1D - OFFICE FLOOR PLAN	Reid Campbell
A4005	WAREHOUSE 1D - ELEVATIONS 1	Reid Campbell
A4006	WAREHOUSE 1D - ELEVATIONS 2	Reid Campbell
A4007	WAREHOUSE 1D - SECTION AA, BB	Reid Campbell
A4010	WAREHOUSE 1D - EXTERNAL FINISHES BOARD	Reid Campbell
Landscape		
Drawing No.	Description	Author
LDA-01	Landscape Masterplan	Ground Arch Ink Landscape
LDA-02	Stage 1 Landscape Plan	Ground Arch Ink Landscape
LDA-03	Stage 2 Landscape Plan	Ground Arch Ink Landscape
LDA-04	Stage 3 Landscape Plan	Ground Arch Ink Landscape
LDA-05	External Storage Area Landscape Plan	Ground Arch Ink Landscape
LDA-06	Landscape Details	Ground Arch Ink Landscape
Civil Engineering		
Drawing No.	Description	Author
EISC1001	Cover Sheet and Drawing List	Arcadis
EISC1002	General Arrangement Plan	Arcadis
EISC1011	Preliminary Erosion and Sediment Control Plan	Arcadis
EISC1021	Cut and Fill Plan	Arcadis
EISC1031	Siteworks and Stormwater Plan	Arcadis
EISC1041	Typical Site Sections	Arcadis

3.2.5 Supporting Documents

Documents provided in support of the proposal are outlined in **Table 7**.

Table 7: Document Schedule		
Appendix No.	Description	Author
Appendix 1	Secretary's Environmental Assessment Requirements	NSW Department of Planning & Environment
Appendix 2	Quantity Surveyors Report	Rider Levitt Bucknall
Appendix 3	Survey Plan	Cardno
Appendix 4	Architectural Plans	Reid and Campbell
Appendix 5	Design Statement	Reid and Campbell
Appendix 6	Landscape Plan	Groundink
Appendix 7	Traffic Impact Assessment	Ason
Appendix 8	Noise Impact Assessment	Wilkinson Murray
Appendix 9	Civil Plans	Arcadis
Appendix 10	Flooding and Stormwater Report	Arcadis
Appendix 11	Geotechnical Investigation	Golder Associates
Appendix 12	Air Quality Assessment	Wilkinson Murray
Appendix 13	Infrastructure Report	Arcadis
Appendix 14	Environmental Site Assessment	Golder Associates
Appendix 15	Waste Management Assessment	Arcadis
Appendix 16	Aboriginal Heritage Assessment	Artefact
Appendix 17	Non-Aboriginal Heritage Assessment	Artefact
Appendix 18	Building Code of Australia Statement	McKenzie Group
Appendix 19	Sustainability Management Plan	Arcadis
Appendix 20	Light Spill Assessment	Arcadis
Appendix 21	Clause 4.6 Variation	Willowtree Planning

3.3 PROJECT NEED

In response to the operational needs of businesses operating at a local and national scale, it has been determined that the proposed Warehouse and Logistics Hub for the storage and distribution of freight is required. Further, the proposal responds to the industrial character of the site and its surrounds, and retains the use of the site for employment-generating development. Therefore the proposal is considered essential for the continued provision of employment in the industrial sector. The proposal is considered necessary to improve the operational efficiencies and capacity of warehousing, transport and logistics businesses within NSW, and facilitate future growth of the incoming tenants.

Further, the provision of a Warehouse and Logistics Hub on land within south-western Sydney that is currently used and zoned for industry responds to the relevant local, regional and state strategic policies as well as relevant legislation as detailed in Part D of this EIS. These statutory and policy documents identify the importance of preserving employment-generating land uses in accessible location and accordingly reinforce the need for the proposed development.

A More detailed justification of the need for the proposed Warehouse and Logistics Hub is provided in Part H of this EIS. The environmental risk assessment undertaken in Part F, concludes that the proposal is consistent and commensurate with state, regional and local planning objectives, the environmental characteristics of the site, the surrounding context and the principles of ecologically sustainable development (ESD).

3.4 CONSIDERATION OF ALTERNATIVES

The intention of the proposal is to construct and operate a Warehouse and Logistics Hub. It is considered the proposal:

- Allows for the development as a permissible use;
- Has appropriate access to the regional road network;
- Is compatible with surrounding development and local context;
- Will generate employment opportunities, thus contributing to the growth of Western Sydney;
- Will result in minimal impact on the environment; and
- Will allow for the implementation of suitable mitigation measures where required.

The site is considered to be appropriate for the proposal as it allows for warehousing, distribution and logistics purposes in an established industrial precinct. The site design and layout of the built form maintains consistency with the objectives of the IN1 zone and will enhance the underlying industrial character intended for the locality. This will be achieved by the built form which reinforces the industrial nature of the land and is sensitive to the surrounding environment.

The options considered, and subsequently dismissed, in arriving to the current proposal included:

(a) 'Do Nothing' Scenario

This option was dismissed as the objectives of the project would not be met. If the proposal was not to proceed, the site would be able to be developed for other employment generating opportunities or the existing use may continue to operate which accords with the objectives of the IN General Industrial Zone. However retention of the existing use of the site would not fully realise the employment generating potential as proposed under the subject application which seeks to generate in the order of an additional 250 jobs.

(b) Development on an Alternative Site

Consideration to alternative sites was given, however these were dismissed as the subject site resulted in the most beneficial outcomes for the proposal and ensures that significant infrastructure investment results in employment opportunities as:

- it will be situated within a locality that is surrounded by industry and employment generating uses;
- the site has appropriate proximity from sensitive land use activities including residential development;
- all potential environmental impacts of the proposal can be suitably mitigated within the site;
- the proximity to the regional road network provides increased economic benefits;
- the proposal will not affect any area of heritage or archaeological significance; and
- the proposal can be developed with appropriate visual amenity given its surrounding context.

The proposal is justified on the basis it is compatible with the locality in which it is proposed while having no adverse economic, environmental or social impact.

PART D LEGISLATIVE AND POLICY FRAMEWORK

Controls and Policies

The following current and draft Commonwealth, State, Regional and Local planning controls and policies have been considered in the preparation of this application:

State Planning Context

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning & Assessment Regulation 2000*
- *Protection of the Environment Operations Act 1997*
- *Threatened Species Conservation Act 1995*
- *NSW 2021: A Plan to Make NSW Number One*
- *A Plan for Growing Sydney*
- *State Environmental Planning Policy (State and Regional Development) 2011*
- *State Environmental Planning Policy (Infrastructure) 2007*
- *State Environmental Planning Policy No.33 – Hazardous and Offensive Development*
- *State Environmental Planning Policy No. 55 – Remediation of Land*

Local Planning Context

- *Campbelltown Local Environmental Plan 2015*
- *Campbelltown (Sustainable City) Development Control Plan 2015*

This planning framework is considered in detail in the following sections.

4.1 ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) is the overarching governing document for all development in NSW and pursuant to Section 89D (2) provides that:

A State environmental planning policy may declare any development, or any class or description of development, to be State significant development.

The proposed development has been identified as State Significant Development under *State Environmental Planning Policy (State and Regional Development) 2011* as outlined below.

4.2 PROTECTION OF THE ENVIRONMENT OPERATIONS ACT 1997

Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act) contains a core list of activities that require a licence before they may be undertaken or carried out. The definition of an 'activity' for the purposes of the POEO Act is:

"an industrial, agricultural or commercial activity or an activity of any other nature whatever (including the keeping of a substance or an animal)."

The proposal will not involve any activity that would require the issue of an Environmental Protection Licence.

4.3 THREATENED SPECIES CONSERVATION ACT 1995

The proposal will not require the removal of any critically endangered vegetation or habitat, thus will not trigger any thresholds under this Act.

4.4 NSW 2021: A PLAN TO MAKE NSW NUMBER ONE

NSW 2021 was developed by the NSW State Government to set economic, social and environmental directions for NSW. It sets targets, priorities and actions for delivery of services across the State. The strategies outlined in the Plan include:

- *Rebuild the economy*
- *Return quality services*
- *Renovate infrastructure*
- *Strengthen our local environment and communities*
- *Restore accountability to government*

The Chapter on Rebuilding the Economy is most relevant to the proposal as it provides objectives for achieving growth and prosperity. The plan makes a commitment that supports large and small businesses and describes the importance of the private sector's role in maintaining and creating highly productive jobs to underpin the State's ability to realise higher standards of living for all people.

The proposed development will contribute to the ongoing growth to create jobs within the Sydney Metropolitan Region as the facilities will provide vital opportunities for employment purposes.

4.5 A PLAN FOR GROWING SYDNEY

A Plan for Growing Sydney was introduced by State Government in December 2014 and replaced the Metropolitan Plan for Sydney 2036. A Plan for Growing Sydney supports and implements the NSW 2021 State Plan, which identifies restoring economic growth as its number one priority.

The plan presents a strategy for accommodating Sydney's future population growth. It balances the need for more housing, but also cultivates the creation of strong and resilient communities within a highly liveable city whilst protecting the natural environment and biodiversity.

As outlined in the plan it seeks to ensure new housing will be located close to jobs, public transport, community facilities and services. It acknowledges the need to offer choice in housing location, size and typologies, to better suit our lifestyles and budgets. Most importantly, more intensive housing development across the city will be matched with investment in infrastructure and services, culture and the arts, and open spaces. The proposed Warehouse and Logistics Hub will provide significant employment opportunities close to residential development therefore supporting sustainability of intensified residential development in western and south-western Sydney through the provision of jobs close to homes.

A Plan for Growing Sydney also provides a framework for strengthening the global competitiveness of Sydney, in order to facilitate strong investment and employment growth. Specifically, the Campbelltown LGA is located within the South West subregion, earmarked for significant infrastructure investment and intensive growth over the next 20 years. The strategy seeks to identify suitable locations for housing and employment growth coordinated with infrastructure delivery (urban renewal), including around priority precincts, established and new centres, and along key public transport corridors.'

In response to this aim the proposed development site is considered to provide a development located within close proximity to key precincts that are expected to experience significant employment growth and infrastructure investment.

Environmental Impact Statement
Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

The following outlines a number of key directions identified in the Plan for Growing Sydney that the proposed development can demonstrate alignment to.

Table 8: A Plan for Growing Sydney - Strategic Directions	
Strategic Direction	Strategic Justification of the Proposal
1.3 Transform the productivity of Western Sydney Through Growth and Investment	The proposal contributes to the growth of Western Sydney through the provision of jobs close to housing.
1.6 Expand the Global Economic Corridor	The site is not included within the identified Global Economic Corridor within A Plan or Growing Sydney. The proposed development will however contribute significantly to the growth of the corridor and business in Sydney by its proximity to the corridor.
3.1 Revitalise Sydney's Existing Suburbs	The proposal will contribute to revitalising the Campbelltown LGA, and will provide supply of employment uses in an area of high accessibility, and contributing to desirable employment outcomes.

4.6 STATE ENVIRONMENTAL PLANNING POLICY (STATE AND REGIONAL DEVELOPMENT) 2011

Proposals involving activities that are listed in Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* (State and Regional Development SEPP) are identified as being State Significant Development (SSD).

Clause 12 of Schedule 1 states:

12 Warehouses or distribution centres

- (1) Development that has a capital investment value of more than \$50 million for the purpose of warehouses or distribution centres (including container storage facilities) at one location and related to the same operation.*
- (2) This clause does not apply to development for the purposes of warehouses or distribution centres to which clause 18 or 19 applies.*

The proposal is for a warehouse or distribution centre and the Capital Investment Value of the entire proposal is in excess of \$50 Million, thus the State Significant provisions apply.

4.7 STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE) 2007

State Environmental Planning Policy (Infrastructure) 2007 (SEPP Infrastructure) provides for certain proposals, known as Traffic Generating Development, to be referred to NSW Roads and Maritime Services (RMS) for concurrence.

The referral thresholds for 'Industry' development are:

- *20,000m² or more in area with site access to any road; or*
- *5,000m² or more in area where the site has access to a classified road or to a road that connects to a classified road (if access is within 90 metres of connection, measured along the alignment of the connecting road).*

As the proposal seeks consent the construction of 112,000sqm of GFA, referral to RMS is required.

The Traffic Impact Assessment (**Appendix 7**) addresses the matters that must be considered by RMS. The following matters have been specifically addressed within the TIA in support of the subject application which demonstrates the provisions of the SEPP are satisfied by:

- the efficiency of movement of people and freight to and from the site and the extent of multipurpose trips,
- the potential to minimise the need for travel by car and to maximise movement of freight in containers; and
- potential traffic safety, road congestion or parking implications of the Development.

It is noted that consultation with the RMS has been undertaken in the preparation of this EIS (see **Part E** and **Appendix 21**).

4.8 STATE ENVIRONMENTAL PLANNING POLICY NO. 33 – HAZARDOUS AND OFFENSIVE DEVELOPMENT

The proposed development does not relate to the storage or manufacturing of any dangerous goods and therefore is not considered to trigger any requirements pursuant to *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development*.

4.9 STATE ENVIRONMENTAL PLANNING POLICY NO. 55 – REMEDIATION OF LAND

Under the provisions of *State Environmental Planning Policy No. 55 – Remediation of Land* (SEPP 55), where a development application is made concerning land that is contaminated, the consent authority must not grant consent unless:

- (a) *it has considered whether the land is contaminated, and*
- (b) *if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and*
- (c) *if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.*

A Phase 1 and Limited Phase 2 Environmental Site Assessment has been undertaken by Golder Associates and is provided at **Appendix 14**. The Assessment concludes that *'conditions on site are unlikely to prevent the proposed commercial/industrial redevelopment. However, due to the limitations of this investigation, there is potential for undetected contaminated soil and or groundwater to be present in the central portion of the site. Further investigations are warranted during the future redevelopment, and remediation and or management may be required in selected areas of the site.'*

4.10 STATE ENVIRONMENTAL PLANNING POLICY NO. 64 – ADVERTISING & SIGNAGE

Approval for signage is sought for estate and building identification signage. Assessment against the SEPP is provided below in **Table 9**.

Table 9: SEPP 64 Criteria	
Criteria	Compliance
1 Character of the area	
<i>Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located?</i>	Yes, the proposal will be undertaken adjacent and existing industrial precinct that contains signage for Business Identification purposes.

Environmental Impact Statement
Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

<i>Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?</i>	Yes, as above.
2 Special areas	
<i>Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas?</i>	No, the site is suitably removed from sensitive receptors including residential areas, open space and heritage items.
3 Views and vistas	
<i>Does the proposal obscure or compromise important views?</i>	No, signage will not be positioned to obstruct any important views.
<i>Does the proposal dominate the skyline and reduce the quality of vistas?</i>	No, the development will be of a size and design suitable for the intended use and context. Furthermore, the signage will not be dominant on the skyline given the position of the signage located on the façade on the building, or in a location that is well below the roof level.
<i>Does the proposal respect the viewing rights of other advertisers?</i>	Yes, the development will not obstruct viewing towards any other signage.
4 Streetscape, setting or landscape	
<i>Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?</i>	Yes, the signage is appropriate for the setting provided on the site and the location of the site within the proposed estate.
<i>Does the proposal contribute to the visual interest of the streetscape, setting or landscape?</i>	Yes, the signage is to be used to provide identification and direction in a manner that respects the landscape and architectural design.
<i>Does the proposal reduce clutter by rationalising and simplifying existing advertising?</i>	Yes, the number of signs has been limited to reduce the visual impact of the proposal.
<i>Does the proposal screen unsightliness?</i>	The signage will not be used as a visual screen or filter.
<i>Does the proposal protrude above buildings, structures or tree canopies in the area or locality?</i>	No, the signage will not be dominant on the skyline. It will be located below the roof level.
<i>Does the proposal require ongoing vegetation management?</i>	No.
5 Site and building	
<i>Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located?</i>	Yes, the signage will be of suitable scale and design for its intended purpose. The signage will only occupy a small proportion of the building façade and overall estate area.
<i>Does the proposal respect important features of the site or building, or both?</i>	Yes, the signage will not be the dominant visual feature of the building and will remain below the roof line.
<i>Does the proposal show innovation and imagination in its relationship to the site or building, or both?</i>	Yes, signage will be logically positioned to identify the tenants and develop the estate profile. The sign also contributes to the industrial character of the precinct.
6 Associated devices and logos with advertisements and advertising structures	
<i>Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed?</i>	Appropriate lighting will be provided to illuminate the estate signage.
7 Illumination	
<i>Would illumination result in unacceptable glare?</i>	Signage will be designed to avoid unacceptable glare.
<i>Would illumination affect safety for pedestrians, vehicles or aircraft?</i>	No impact on the safety of pedestrians, vehicles or aircraft is to result from the intended lighting.
<i>Would illumination detract from the amenity of any residence or other form of accommodation?</i>	The site is suitably removed from sensitive receptors.
<i>Is the illumination subject to a curfew?</i>	No curfew will apply to the proposed sign lighting.

Environmental Impact Statement

Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

<i>Can the intensity of the illumination be adjusted, if necessary?</i>	Intensity of illumination would be adjusted through replacement of bulb wattage.
8 Safety	
<i>Would the proposal reduce the safety for any public road?</i>	The signage will not be positioned to cause any hazard for any road.
<i>Would the proposal reduce the safety for pedestrians or bicyclists?</i>	The signage is not considered to reduce safety for pedestrians or bicyclists.
<i>Would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas?</i>	The signage will not cause disruption of any sightlines from public areas.

Advertisements

Part 3 of SEPP 64 outlines a number of additional matters to be considered for certain signs. This Part does not apply to Business Identification Signage and is not applicable to the proposal.

Based on the above, where the proposed signage is undertaken in accordance with the specified parameters, the development will be consistent with the provisions of SEPP 64.

4.11 CAMPBELLTOWN LOCAL ENVIRONMENTAL PLAN 2015

The relevant provisions of *Campbelltown Local Environmental Plan 2015* (CLEP2015) as they relate to the subject site are considered below:

Zoning and Permissibility

The subject site is located in the IN1 General Industrial Zone under the *Campbelltown Local Environmental Plan 2015* (CLEP2015) (**Figure 7**). The objectives of the zone are:

- *To provide a wide range of industrial and warehouse land uses.*
- *To encourage employment opportunities.*
- *To minimise any adverse effect of industry on other land uses.*
- *To support and protect industrial land for industrial uses.*
- *To provide for a range of facilities and services to meet the day-to-day needs of workers in the area.*
- *To enable non-industrial land uses that are compatible with and do not detract from industrial and warehouse uses or impact on the viability of existing centres.*
- *To ensure that any commercial, retail or other non-industrial development is not likely to adversely affect employment generating activities or opportunities.*
- *To facilitate diverse and sustainable means of access and movement.*

The proposal is consistent with the objectives of the zone as it relates to the construction of warehouse and distribution facilities which will provide significant employment opportunities in the industrial sector resulting in positive implications for the local and regional economies. The site is surrounded by similar industrial-zoned land and will reinforce the identity, and support the viability, of the precinct. The proposed warehouses will be compatible with adjoining land uses including other industrial facilities while not being in immediate proximity of any sensitive land uses. The subject site is in an accessible location being well-served by existing road and utilities infrastructure.

The proposed use of the subject site is defined under CLEP2015 as a warehouse and 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.

Environmental Impact Statement

Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

Warehouse and distribution centres are permitted with consent in the IN1 General Industrial Zone.

In light of the above, the proposal is both consistent with the relevant objectives of the zone, and permissible, with development consent.

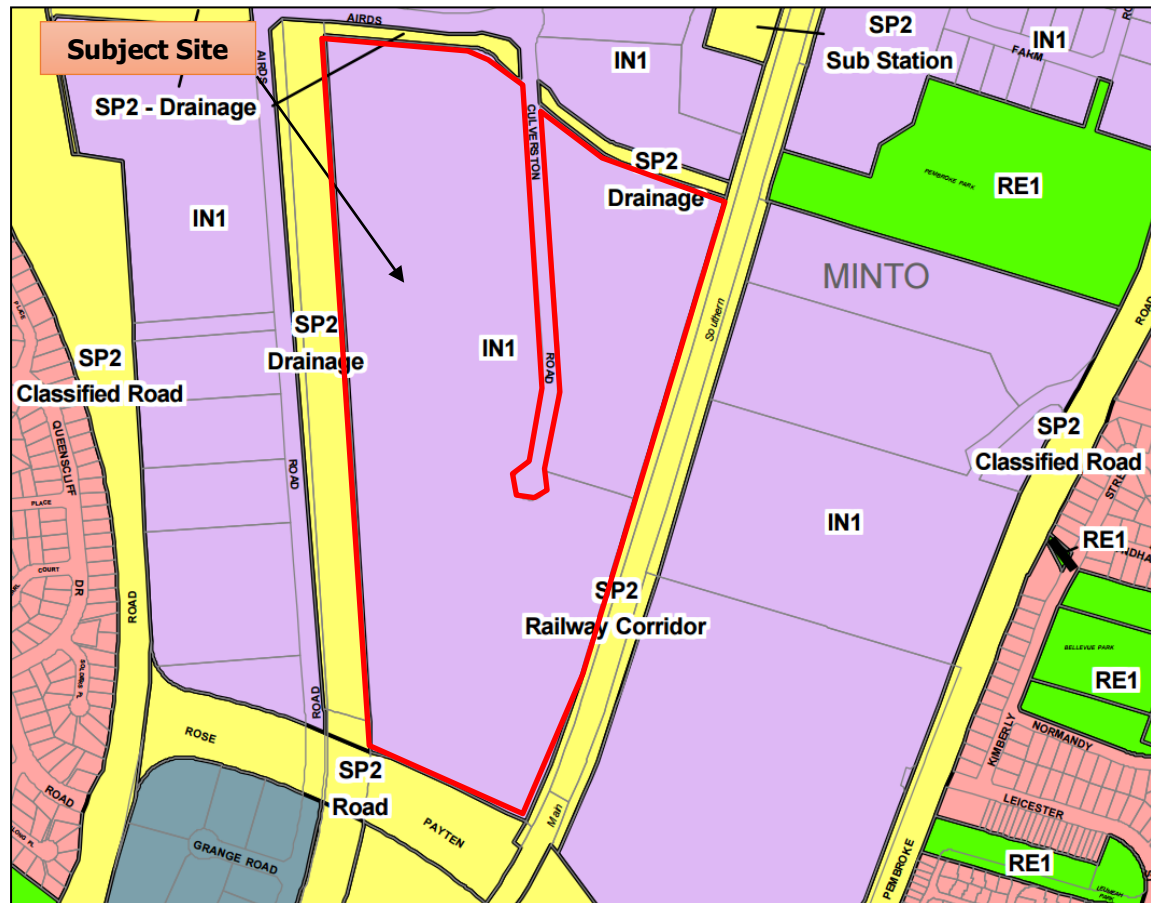


Figure 7: Zoning Map (Source: NSW Legislation 2016)

Minimum Subdivision Lot Size

The site is subject to a minimum lot size of 4,000m² under the provisions of the CLEP2015.

No subdivision is proposed subject to this development application.



Figure 8: Minimum Subdivision Lot Size Map (Source: NSW Legislation 2016)

Height of Buildings

The site is subject to a maximum building height of 12m under the provisions of the CLEP2015.

The proposed warehouses exhibit a maximum height of 13.7m. This represents a minor non-compliance in the order of 1.7m affecting only the apex of the roof and accordingly will not exhibit any unacceptable impacts. The proposed 13.7m building height reflects the heights of existing and approved warehouses within the Keylink industrial Estate to the east of the site. The proposed height is considered suitable for the site given the single-storey form of the warehouses which is consistent with the built form character of surrounding industrial development. The proposed 13.7m maximum building height has been provided in response to the operational requirements of the future occupants of the warehouses.

The proposed development is considered to achieve the objectives of clause 4.3 of the CLEP2015 in that the scale of the proposed development is compatible with surrounding built form. The site is located within a strategic industrial area and is surrounded by industrial land uses with which the proposed development is highly compatible. The proposed building height will not adversely impact on the amenity of any surrounding land uses.

Environmental Impact Statement

Proposed Warehouse and Logistics Hub 5 and 9 Culverston Road, Minto

Landscaping within the setbacks will soften the appearance of the built form and hardstand, reduce the appearance of the bulk and scale of the development and provide a buffer to adjoining sites ensuring a high level of visual and acoustic amenity is maintained. The proposed building height will not cause any undesirable visual impact, view obstruction, privacy intrusion or loss of solar access. The visual appearance of the proposed development is shown in the photomontages and perspectives provided within the Architectural Plans at **Appendix 4**.

In response to the deviation from the Height of Buildings Development Standard, a Clause 4.6 Variation (**Appendix 21**) has been prepared which sufficiently justifies the proposal.



Figure 9: Height of Buildings Maps (Source: NSW Legislation 2016)

Floor Space Ratio

The site is not subject to a maximum floor space ratio under the provisions of CLEP2015.

In total, the building area of 112,000m² over a total site area of 29.63ha results in an FSR of approximately 0.38:1.

It is considered that the proposed built form is of a density, scale and bulk consistent with the character of surrounding industrial development. The proposed warehouses are compatible with surrounding land uses and will preserve the amenity of all nearby development. The proposed development has been significantly setback from the street frontage and will not be visually obtrusive.

Preservation of Trees or Vegetation

The site has been largely cleared and does not contain any significant vegetation. Where possible, trees have been retained along the boundaries.

Heritage Conservation

The site is not identified in the CLEP2015 as an item of environmental heritage or within a heritage conservation area.

Earthworks

The proposal includes bulk earthworks to provide suitable levels across the site for the built form. Details of earthworks are provided in the Civil Plans at **Appendix 9**.

Riparian Land, Waterways and Groundwater Systems

The site is not located in proximity of any waterways and will not affect any riparian land, waterways or groundwater systems.

Environmentally Constrained Land

The site is not identified as environmentally constrained.

Essential Services

The site is currently connected to all essential services and the proposed development will continue to be serviced by existing utilities and infrastructure.

4.12 CAMPBELLTOWN (SUSTAINABLE CITY) DEVELOPMENT CONTROL PLAN 2015

Campbelltown (Sustainable City) Development Control Plan 2015 is Council's primary DCP. It aims to promote high quality development and encourage safe and livable environments. The proposed development achieves all relevant objectives and provisions of the CDCP2015 through the provision of a high quality development consistent with the industrial character of the area.

It is noted that Section 11 of *State Environmental Planning Policy (State and Regional Development) 2011* states:

- 11 *Exclusion of application of development control plans***
Development control plans (whether made before or after the commencement of this Policy) do not apply to:

(a) State significant development

Nevertheless, the relevant provisions of Campbelltown (Sustainable City) Development Control Plan 2015 (CDCP2015) are addressed below, demonstrating consistency with the key built form controls.

Other relevant matters are discussed in detail in *Part F Environmental Risk Assessment* of this EIS.

Environmental Impact Statement
Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

Table 10: Campbelltown (Sustainable City) Development Control Plan 2015	
CDCP2015 Control	Comment
Offices: Offices shall not comprise more than 30% of the gross floor area of the respective unit.	The proposed offices comprise GFA equivalent to 5%, 4.5%, 4.5% and 4.3% of their respective warehouses, thus complies.
Building Setbacks: Industrial development shall be setback by: 30m to the Main Southern Railway and Rose Payten Drive. 15m to Airds Road to the north. 11m to Airds Road to the west where adjoining Bow Bowing Creek where the boundary is 58m from the road reserve 10m to any other road.	The proposed development has been setback 30m from Rose Payten Drive, 11m from Airds Road to the west, 15m from Airds Road to the north and 10m from Culverston Road. All buildings on the site have been setback over 30m from the Main Southern Railway. Accordingly the proposed setback comply with CDCP2015.
Car Parking: Car parking should be provided in accordance with the following rates: 1 space for every 100 m² for the first 2,000 m² GFA and 1 space per 250 m² for all floor space exceeding than 2,000 m² GFA. 1 space for every 35 m² for all office and ancillary GFA.	For the proposed development, application of these rates results in a requirement for 628 spaces. The proposal provides 481 spaces in accordance with the RMS Guide and the estimated demand generated by the operation of the facilities. This is further justified within the Traffic Impact Assessment at Appendix 7. Additionally space is provided on the site for the future provision of another 147 space should demand for additional car parking be demonstrated.
Landscaping: Landscaping shall be provided to a minimum depth of 50% of the following required setback area located: - along the full width of each street frontage (other than vehicle driveways); and - along the full width of setbacks from adjoining open space, residential and/or commercial areas. The first three (3) metres of all required street front landscaped area (as measured from the street boundary) shall be planted of advanced canopy trees that are: - a minimum of two (2) metres in height with a minimum 400 litre pot size at the time of planting; - of native species; and - planted /placed every 10 metres. Side boundary landscaping of a minimum of one (1) metre width shall be provided between the street boundary and the building line.	Landscaping has been provided within all setbacks along the full width of the street frontage. Deep soil landscaping includes native canopy trees planted at appropriate intervals.

PART E CONSULTATION

In response to the SEARs issued for the proposal, the following consultation has been as detailed in **Table 11** below:

Table 11: Consultation Record	
Agency/Council	Consultation Notes
Campbelltown City Council	A meeting was held at Campbelltown City Council on Tuesday 29 March 2016. Attendees included: ▪ Steve Ryan (Tactical); ▪ Nathan Cairney (Tactical); ▪ Andrew Cowan (Willowtree Planning); ▪ Piran Trethewey (Ason Group); ▪ Song Kitcharayothin (Reid Campbell); ▪ Brendan Leo (Campbelltown City Council); and ▪ Joseph Luke (Campbelltown City Council). Matters discussed at this meeting included: ▪ Setbacks to surrounding roads; ▪ Landscaping to enhance the visual amenity of the site; ▪ Elevation and colour schemes; ▪ Noise impacts associated with the proposal and suitable mitigation measures; ▪ Intended use of the site; and ▪ Traffic and parking requirements. Council indicated general support for the proposal, however reiterated that particular attention should be given to the visual amenity from the public domain and surrounding private properties. As illustrated on the architectural and landscape plans, sufficient setbacks and deep soil planting have been provided along all boundaries to mitigate the impacts in this respect. A further meeting was held on 28 April 2016 to discuss flooding and the flood information Council issued. In direct response to the advice from Council that the property is within the 1% annual exceedance probability (due to local overland flow from the surrounding drainage channels and catchment), the final site levels have been raised above the 1% AEP (1:100 year flood event) to satisfy Council guidelines. The meeting also covered a discrepancy between the assumed LIDAR site levels and the actual site levels, and Council noted that regardless of the discrepancy they still expect any flood impacts associated with the development to be within acceptable limits. Access was requested to the flood model in order to undertake sensitivity testing of

Environmental Impact Statement

Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

Table 11: Consultation Record

Agency/Council	Consultation Notes
	the extents, however the request was rejected by council, stating that it is not Council practice to make the flood model available to private developers. On the basis that the flood model is not available, it is considered that sufficient measures have been incorporated given the information that has been made available.
Environment Protection Authority	Andrew Cowan of Willowtree Planning contacted the EPA on 1 April 2016 and was advised that a detailed review would be undertaken during the exhibition period and no further consultation would be required prior to lodgement.
Office of Environment and Heritage	Andrew Cowan of Willowtree Planning contacted Susan Harrison of OEH on 27 April and was advised that further comment would be provided during the exhibition period and there is no need to consult prior to lodgement of the EIS.
Department of Primary Industries	Andrew Cowan of Willowtree Planning contacted Wayne Connors of DPI Water on 4 April 2016 and was advised that further comment would be provided during the exhibition period and there is no need to consult prior to lodgement of the EIS.
Department of Industry – Resources and Energy	Email correspondence was sent to the Department of Industry on 4 April 2016 by Andrew Cowan of Willowtree Planning outlining the proposal and requesting confirmation if further consultation would be required. Pamela Gould of DoI responded on the same day confirming that a detailed review would be undertaken during the exhibition period and that further consultation would not be required prior to lodgement.
Transport for NSW	Email correspondence was sent to Mark Ozinga of Transport for NSW on 27 April 2016, containing the draft Traffic Impact Assessment addressing the matters raised by TfNSW. As such, a response is yet to be received on the draft report that was provided for comment.
Roads & Maritime Services	Andrew Cowan of Willowtree Planning and Piran Trethewey of Ason Group met with Hans Pilly Mootanah on 15 March 2016. Key matters raised by RMS included: ▪ <i>Traffic report to provide summary of the traffic distribution of the development, followed by the impacts on the key surrounding intersections including Campbelltown Road/Rose Payten Drive; Campbelltown Road/Ben Lomond Road; and Pembroke Road/Rose Payten Drive.</i> The above has been comprehensively addressed within the Traffic Impact Assessment and Section 6.2 of this EIS.
Local Residents	Surrounding local residents were sent a copy of the proposed development plans and a summary letter on 1 April 2016. Recipients of the consultation package included the residents of the following properties: ▪ 26 Kippax Avenue, Leumeah ▪ 42 Leicester Street, Leumeah ▪ 22 Kimberly Street, Leumeah ▪ 42 Kimberly Street, Leumeah ▪ 401 Pembroke Road, Minto ▪ 32 Collaroy Road, Woodbine

Environmental Impact Statement

Proposed Warehouse and Logistics Hub

5 and 9 Culverston Road, Minto

Table 11: Consultation Record

Agency/Council	Consultation Notes
	▪ 5 Soldiers Pl, Woodbine ▪ 28 Queenscliff Drive, Woodbine ▪ 38 Queenscliff Drive, Woodbine ▪ 7 Bungan Pl, Woodbine ▪ 19 Bungan Pl, Woodbine The above addresses were derived from the properties that were identified in the noise and air reports. To date, no written response has been received regarding the proposal.
Sydney Water	Arcadis contacted Sydney Water as part of the infrastructure and servicing investigations. A feasibility application will be lodged subsequent to exhibition of the EIS. Correspondence received from Sydney Water indicates that a detailed review of the proposal will be undertaken during the exhibition stage.
Sydney Trains	Andrew Cowan of Willowtree Planning contacted Chris Bailey of Sydney Trains on 19 April 2016 and was advised that further detailed review would be carried out during the exhibition of the EIS should it be referred. Given the separation of the proposal to the rail corridor, it was reiterated that there is unlikely to be any issues of concern.

PART F ENVIRONMENTAL RISK ASSESSMENT

6.1 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

The Secretary's Environmental Assessment Requirements were received on 10 March 2016. The Key Issues include:

- Strategic and Statutory Context;
- Traffic and Transport;
- Urban Design and Visual;
- Noise and Vibration;
- Soils and Water;
- Air Quality;
- Infrastructure Requirements;
- Greenhouse Gas and Energy Efficiency;
- Ecologically Sustainable Development;
- Waste;
- Contributions; and
- Mineral Resources.

The above matters are addressed in the sections below.

6.2 STRATEGIC & STATUTORY CONTEXT

Refer Part D above in respect of the strategic context of the site.

6.3 TRAFFIC AND TRANSPORT

A Traffic Impact Assessment prepared by Ason Group is provided at **Appendix 7**. The Traffic Impact Assessment addresses the SEARs, State and Local Government controls, Australian Standards and matters raised in consultation with the RMS.

Existing traffic condition have been modeled, with the key intersections being:

- Campbelltown Road/Rose Payten Drive;
- Rose Payten Drive/Airds Road; and
- Airds Road/Culverston Road.

The results show that all key intersections are currently operating at 'good' levels of performance during the morning and evening peak hours with a LOS of B or better.

Recognising that the site comprises all areas accessed from Culverston Road, a 7-day, 24-hour tube count surveys of Culverston Road was undertaken to determine the existing traffic generation of the site. The weekday results identified the following peak hour traffic volumes:

- 65 trips during the morning peak hour; and
- 55 trips during the evening peak hour.

Figure 10 below provides the baseline traffic conditions.

Environmental Impact Statement

Proposed Warehouse and Logistics Hub

5 and 9 Culverston Road, Minto

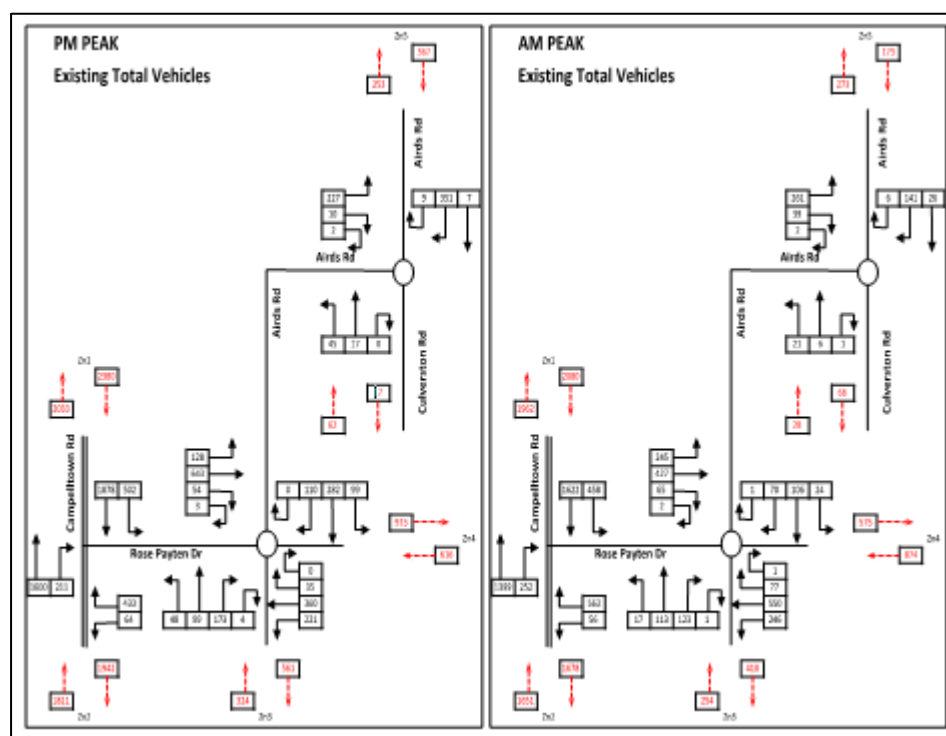


Figure 10: Baseline Traffic Volumes

Based on the application of the *RMS Guide Trip Rates for Business Parks and Industrial Estate Development*, the following traffic generation forecasts result for the development:

- 175 trips during the morning peak hour;
- 176 trips during the evening peak hour; and
- 2,352 trips per day.

Peak hour traffic volumes generated by the existing development on the site equate to 65 trips during the morning peak hour and 55 trips during the evening peak hour and accordingly the estimated traffic generation arising from the proposed development represents the following net (additional) peak hour traffic forecast:

- 110 trips during the morning peak hour (83 in, 27 out); and
- 121 trips during the evening peak hour (30 in, 91 out).

Table 12 summarises the traffic generation and mode share of the proposed development.

Transport Mode	Mode Share (%)	Peak Hour		Daily
		AM	PM	
Vehicle	90%	175	176	2352
Car passenger	8.2%	16	16	214
Bus	1.5%	3	3	39
Cycle	0.2%	0	0	5
Motorbike	0.1%	0	0	3
On Foot	0.2%	0	0	5
Other	0%	0	0	0
Total	100%	194	195	2618

Environmental Impact Statement

Proposed Warehouse and Logistics Hub

5 and 9 Culverston Road, Minto

SIDRA intersection modelling demonstrates that all key intersections are currently operating at 'good' levels of performance during the morning and evening peak hours with a Level of Service (LOS) of B or better. SIDRA modelling shows that all intersections are expected to continue to operate at 'good' levels during the construction and operation of the proposed development. Results of SIDRA modelling are summarised in **Table 13**:

Intersection	Scenario	Period	Degree of Saturation	Average Vehicle Delay (sec)	Level of Service
Campbelltown Rd/ Rose Payten Drive	Existing	AM	0.793	20.1	B
		PM	0.922	23.7	B
	With Development	AM	0.812	20.7	B
		PM	0.923	24.0	B
Rose Payten Drive/ Airs Rd	Existing	AM	0.425	14.1	A
		PM	0.437	13.1	A
	With Development	AM	0.436	14.2	A
		PM	0.447	13.3	A
Airs Rd/ Culverston Rd	Existing	AM	0.210	12.3	A
		PM	0.241	11.5	A
	With Development	AM	0.251	12.4	A
		PM	0.264	11.6	A

Consideration of additional intersections, including Campbelltown Road/ Ben Lomond Road and Rose Payten Drive/ Pembroke Road, reveals that the proposal would have no material impact on the performance of these intersections given that only 1 additional trip every 2-4 minutes would be generated.

Further to the 'Standard Assessment' provided above, cumulative assessment considering the development potential of other sites in the area, also reveals that all intersections would continue to operate at good levels with a LOS of B or better. Importantly, levels of service of B or better indicate that the intersections have a reasonable amount of spare capacity and it is anticipated that this spare capacity would adequately accommodate traffic demands arising from the development of the Keylink Industrial Estate.

The Traffic Impact Assessment concludes in relation to traffic generation, road network capacity and intersection performance, that:

'SIDRA analysis indicates that the study network is expected to continue to operate at 'good' levels with a LOS of B or better following completion of the Proposal. It is anticipated that the network would also accommodate cumulative traffic demand and modal analysis indicates that the Proposal would generate no material demand on public transport services or local pedestrian & cycling facilities. Accordingly, the Proposal is supportable on traffic planning grounds.'

An assessment of car parking is also provided within the Traffic Impact Assessment based on the Council's parking controls and the RMS Guide. **Table 14** summarises the car parking requirements for the proposed development.

Warehouse	GFA	DCP Parking Rate	RMS Parking Rate
A	Warehouse: 40,000m ² Office: 2,000m ²	231	183
B	Warehouse: 22,000m ² Office: 1,000m ²	131	98

Environmental Impact Statement

Proposed Warehouse and Logistics Hub

5 and 9 Culverston Road, Minto

C	Warehouse: 22,000m ² Office: 1,000m ²	131	98
D	Warehouse: 23,000m ² Office: 1,000m ²	135	102
Total		628	481

The proposal provides 481 car parking spaces in accordance with the RMS Guide and forecasts based on the operational requirements of the facility. Sufficient space is also provided on the site for the future provision of 147 additional spaces should demonstrated demand indicate a requirement for additional parking.

A total of nine (9) accessible parking spaces designed in accordance with AS2890.6 are also provided satisfying Council's requirement for 1 accessible parking space per 100 spaces.

The Traffic Impact Assessment concludes that *'the Proposal is supportable on parking grounds'* given that the proposal has the potential to comply with Council's DCP if the provisional parking option is exercised in the event the future operation requires it. This approach ensures that the oversupply of parking on the site will be limited which in turn restricts traffic generation and the impost on the surrounding road network. The inclusion of provisional parking is considered consistent with modern warehouse developments throughout the greater Western Sydney Region and provides suitable measures to ensure the development can operate successfully on traffic planning grounds.

The Traffic Impact Assessment also provides an assessment of access, internal circulation and car parking which comply with Council's DCP and relevant Australian Standards. The following provides a summary of the proposed site access, car park design and commercial vehicle facilities.

Site Access

- All vehicles will enter the proposed developments via access driveways located on Culverston Road.
- All vehicles would enter and exit the warehouses in a forward direction.
- Each warehouse provides separate driveways for light vehicles (cars) accessing the car parking areas and heavy vehicles (trucks) accessing the loading dock.
- Commercial vehicle access to Warehouse B and C is provided via a shared driveway crossing. In the event that a subdivision was to be sought to separate these building lots, then a Right of Carriageway would be required to formalise this shared arrangement.
- All truck driveways have been designed in accordance with AS2890.2, either through strict application of the guide requirements or based on swept path analysis as is permissible by the guide. As required, relevant swept path analysis demonstrating acceptable access is presented on plans attached at Appendix C.
- All car driveways have been designed (as a minimum) in accordance with AS2890.1. As required, some driveways have been widened to accommodate the swept paths of fire appliances as shown on plans attached at Appendix C.

Car Park Design

- All standard staff and employee parking is provided (as a minimum) in accordance with AS2890.1 for a Class 1A user, which requires a minimum space length of 5.4m, a minimum width of 2.4m and a minimum aisle width of 5.8m.
- All spaces located adjacent to obstructions of greater than 150mm in height have been provided with an additional 'clearance width' of 300mm. This includes any landscaping that exceeds 150mm.

Environmental Impact Statement

Proposed Warehouse and Logistics Hub

5 and 9 Culverston Road, Minto

- *Dead-end aisles are provided with the required 1.0m aisle extension in accordance with Figure 2.3 of AS2890.1.*
- *All accessible parking spaces are designed in accordance with AS2890.6. Spaces are provided with a clear width of 2.4m and located adjacent to a shared area of 2.4m minimum width.*
- *Relevant swept path analysis is provided on plans attached at Appendix C, which demonstrate compliance with relevant standards.*

Commercial Vehicle Facilities

- *The commercial (heavy) vehicle facilities of the Proposal have been designed having regard for the operational requirements of the future tenant and the requirements of AS2890.2.*
- *The internal design of the service area has been undertaken in accordance with the requirements of AS2890.2 for the maximum length vehicle accessing each dock.*
- *A minimum clear head height of 4.5 metres is provided within all areas traversed by service vehicles.*
- *A minimum bay width of 3.5 metres is provided for all service bays.*
- *All warehouses provide an area within which trucks (up to B-Doubles) can perform a U-turn.*
- *Sufficient room between the hardstand area of Warehouse A and the external storage area is provided to accommodate manoeuvrability of commercial vehicles.*
- *The design includes consideration for emergency vehicles, in particular the provision of a fire trail (where required) around the perimeter of each warehouse building.*
- *Swept path analysis is provided on plans attached at Appendix C, which demonstrate compliance with relevant standards.*

In relation to access and the internal design of the site the Traffic Impact Assessment concludes that:

'The internal configuration of the Site – including light and heavy vehicular access, car parking and servicing areas – has been designed in accordance with Council's DCP and the relevant Australian Standards of AS2890.1, AS2890.2 and AS2890.6. It is however envisaged that a condition of consent would be imposed requiring compliance with these standards and as such any minor amendments considered necessary (if any) can be dealt with prior to the release of a Construction Certificate.'

The Traffic Impact Assessment outlines general principles for the management of construction traffic however it is noted that a detailed Construction Traffic Management Plan will be provided as part of detailed construction planning.

For the construction phase, there are three stages identified which include:

- Phase 1 – Site preparation, bulk earthworks and utilities infrastructure;
- Phase 2 – Construction and fit-out of warehouses; and
- Phase 3 – Miscellaneous structural construction and finishing works.

The overall construction period is anticipated to be in the order of 36 months.

Whilst construction would generate additional truck movements, these are not considered to significantly impact heavy vehicle volumes on Campbelltown Road, Narellan Road, Blaxland Road or the M31 Motorway. The movement of materials would be managed through the scheduling of deliveries and would aim to minimise the number of heavy vehicles accessing the site during peak network periods and weekends.

Environmental Impact Statement

Proposed Warehouse and Logistics Hub

5 and 9 Culverston Road, Minto

Importantly, the construction traffic volumes are expected to be lower than the volumes anticipated for the proposed development once it becomes operational (in the order of 80% of peak operational traffic). Therefore, recognising that the key intersections are expected to perform satisfactorily once the Proposal is completed, it can be assumed that the intersections would satisfactorily accommodate the lower volumes of construction traffic.

The following mitigation measures are recommended:

- *Traffic control would be required to manage and regulate traffic movements into and out of the site during construction.*
- *Disruption to road users would be kept to a minimum by scheduling intensive delivery activities outside of peak hours.*
- *Construction and delivery vehicles would be limited to use of Campbelltown Road, Narellan Road, Blaxland Road or the M31 Motorway and restricted to non-peak periods.*

These mitigation measures will be incorporated in the detailed Construction Traffic Management Plan.

In terms of Dangerous Goods, it is noted that there will be no dangerous goods stored on site under the current proposal; therefore, the preparation of an Incident Management Strategy is not required.

6.4 URBAN DESIGN AND VISUAL

The layout and design of the proposed development provides a positive visual outcome and efficient use of the site with corresponding positive implications for views toward the site and future operations. All components of the development including warehouses, ancillary offices, loading docks, car parking, hardstand, internal vehicular driveways and landscaping have been strategically located to ensure a functional site layout that achieves the operational objectives of the proposal. As detailed in the Design Statement at **Appendix 5**, *'the site layout addresses the necessity for a visually appealing streetscape, building form and orientation whilst also allowing for rational access and operational functionality for the intended users. This creates a compatible proposal that responds to the existing industrial context and supports a positive interaction with the streetscape. The promotion of safety and a high level of functionality and amenity are also key considerations in the proposal. Within the site, building layouts address the main street frontages including Rose Payten Drive, Airs Road, and Culverston Road and conceal loading areas within the site where possible. As an additional measure, landscape buffers have also been introduced to improve visual amenity.'* The staging of the development outlined in section 3.2.2 of this EIS will provide for the logical and timely development of the site in accordance with the needs of the owners and future occupants.

The proposal does not include any changes to the existing road network and will not affect any pedestrian or cycle paths. Existing vehicular access to the site will be retained. Internal driveways have been designed in accordance with relevant Australian Standards to accommodate the largest vehicle expected to access the site. As described by the Design Statement (**Appendix 5**), *'dedicated and direct access has been provided from Culverston Road which also permits the separation of car parking areas and heavy vehicle loading docks. Each of the proposed buildings also allow for free flowing, safe movement of traffic throughout the site. Pedestrian access is also available from the street and car parks.'* More detailed assessment of the traffic and transport aspects of the development is provided within the Traffic Impact Assessment at **Appendix 7** and Section 6.3 of this EIS.

The site coverage, setbacks and proposed landscaping, combined with the height, density and architectural design of the buildings, will provide a suitable development outcome for the

Environmental Impact Statement

Proposed Warehouse and Logistics Hub

5 and 9 Culverston Road, Minto

site that is commensurate with the industrial character of the area and considerate of views from the public domain and surrounding sites. Landscaping within the setbacks will soften the appearance of built form and hardstand and reduce the perceived bulk and scale of the development. Landscaping will also screen outdoor storage areas reducing the visual impact on the streetscape and surrounding areas. As articulated in the Design Statement, landscaping has been designed *'to enhance the existing streetscape and promote scale and density of planting to soften the visual impact of the proposed industrial buildings. Existing trees have been retained where possible in consideration of the existing context and streetscape amenity.'*

The design of the proposed warehouse and distribution facilities encapsulates high commercial and industrial standards by virtue of various configurations and colour which respond to the industrial character of the precinct. The main warehouse walls have been designed to present an articulated form to the public roads where visible. The application of various tones and cladding seeks to alleviate the bulk and scale of the built form making a positive contribution to the streetscape. The colour scheme responds to the surrounding environment through the application of earthy tones, with cool and warm greys as the main colour palette for the structural components.

The building form and character are described within the Design Statement at **Appendix 5** as follows:

'Building form and character have been designed to create an attractive industrial development through high quality design and considered urban planning. Safety through design has been maintained as a core principle, particularly regarding pedestrian access and the separation of light and heavy vehicles. Focal points and important vistas have been designed to present a high quality façade that offers articulation and generates visual interest through the use of selective colour palettes and materials. The proposal generally adheres to Building Setbacks that are stipulated by the Planning Control documents with intention to promote a positive streetscape through scale and density of planting in landscaped areas.'

Further to the above extract from the Design Statement, the perspectives and Aerial Views provided at **Appendix 5** visually demonstrate the visual impact of the proposed development.

Signage has been designed to integrate with the design and scale of built form and has been strategically located in proximity of access and egress areas to ensure legibility for site users. As stated in the Design Statement at **Appendix 5**, *'signage is to be designed to complement the architectural character of the built form and landscaped treatments.'*

The intention is that all buildings, where possible, be provided with a comprehensive landscape setting that integrates the built form with the public domain. The design demonstrates linkage and continuity with tree planting themes, groupings of mass planted shrubs, groundcover planting areas, swathes of native grasses and accent planting. The indicative species have been selected for hardiness, ease of maintenance and proven ability in the area and taking into consideration indigenous species, the Cumberland Plain Woodland and other ecological habitats and communities.

The proposed bulk earthworks have been designed to provide suitable site levels to facilitate the proposed built form. Filling is proposed across the site to create four (4) flat building pads with levels of BEL 50.7m, BEL49.3m, BEL 48.5m and BEL 47.6m, respectively.

Overall cut to fill volumes are summarised in **Table 15**.

Table 15: Cut to Fill Volumes

Cut or Fill	Volume
Total Cut	- 4,900m ³
Total Fill	218,600m ³
Excess of Fill over Cut	213,700m ³

6.5 NOISE AND VIBRATION

A Noise and Vibration Impact Assessment (**Appendix 8**) has been undertaken by Wilkinson Murray to assess the potential noise impacts associated with the proposal. Particular emphasis was placed on the impact of noise emissions generated by heavy vehicle movements on the site access roadways, loading/unloading operations and mechanical plant and equipment upon nearby residential receivers. Noise emissions during construction works and road traffic noise generated by the project are also addressed.

Prixcar services principally include vehicle storage, vehicle processing, pre-delivery inspection and detailing, accessory fitting, fleet build-up and design, paint and panel rectification, showroom and event detailing, event organisation and vehicle preparation and car transport and relocation. Sources of operational noise associated with these services would include heavy vehicle movements associated with transportation of vehicles to and from the site, on-site vehicular movements (light and heavy), general workshop noise emissions associated with spray painting, mechanical services, detailing (water gurneys) and the like. There would also be HVAC plant associated with the offices. Operational noise emissions from the Prix Car services would be inaudible at surrounding residential receivers and therefore would not contribute to the ambient noise level at these locations.

To determine the existing ambient noise environment of the area, noise monitoring was carried out at the two (2) nearest sensitive receptors, which are the residential receivers in Woodbine 300m west of the site and the residential receivers at Leumeah/Minto 500m east of the site. The measurements show daytime background LA90 noise levels generally ranging between 49 dBA and 56 dBA at receivers on the western side of Campbelltown Road and between 44 dBA and 50 dBA at the residential area to the east of Pembroke Road. During the night time period (ie. between 10.00 pm and 7.00 am), background LA90 noise levels fell to 43 dBA and 40 dBA at the western and eastern residential areas, respectively.

For the construction phase a comprehensive list of potentially-noise generating activities is provided within the Noise Impact Assessment divided into three (3) phases being:

- Phase 1 – Site preparation, bulk earthworks and utilities infrastructure;
- Phase 2 – Construction and fit-out of warehouses;
- Phase 3 – Miscellaneous structural construction and finishing works.

For clarity, the miscellaneous phase comprises the following:

- Decommissioning/demobilisation of construction sites;
- Landscaping;
- Rehabilitation of affected areas;
- Post-construction condition surveys;
- Removal of construction environmental controls; and
- Removal of construction ancillary facility related traffic signage.

Precise details in relation to the length of each construction phase were unavailable at this stage of the project. The overall construction period was stated as 36 months.

Environmental Impact Statement

Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

Construction works are to be generally undertaken within the standard daytime construction working hours being 7am-6pm Monday to Friday, 8am-1pm Saturday and no work on Sundays and Public Holidays. Any works undertaken outside of these hours would be carried out in consultation with the relevant regulatory authorities.

The typical construction activities and major plant and equipment associated with the works are summarised in **Table 16**. Predicted construction noise levels for each phase are summarised in **Tables 17, 18** and **19**. Prediction of the noise generated during works demonstrates that the applicable noise management levels are likely to be achieved at all surrounding residential receivers.

Table 16: Construction Works and Equipment Sound Power Levels					
Plant	$L_{Aeq(15min)}$ Sound Power Level dBA re $10^{-5}W$	Construction Activities			
		Period 1 – Site Preparation	Period 2 – Warehouse & Pavement	Period 3 – Warehousing	Period 4 – Miscellaneous
Loaders	107	✓	✓	✓	✓
Static and vibratory rollers, and high energy impact compaction	109	✓	✓	✓	✓
Mobile cranes	99	✓	✓	✓	✓
Excavators	102	✓	✓	✓	
Excavators with hammers	120	✓			
Backhoes	97	✓	✓	✓	✓
Crushing plant	110	✓			
Concrete agitators (or similar)	104	✓	✓	✓	✓
Concrete pumps	103		✓	✓	
Concrete saws	111	✓	✓	✓	✓
Air compressors	104	✓	✓	✓	✓
Jackhammers	111	✓	✓	✓	✓
Dozers	107	✓			
20-40 tonne articulated tipper trucks	107	✓	✓	✓	
Graders	107	✓	✓	✓	
Water trucks	109	✓	✓	✓	✓
Forklifts	102		✓	✓	✓

Environmental Impact Statement
Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

Small earthmoving equipment	103	✓	✓	✓	✓
Welder	98		✓	✓	✓

Table 17: Predicted LAeq Construction Noise Levels – Phase 1

Rec.	Address	L _{Aeq} Construction Noise Level dBA Rockhammer / No Rockhammer	NCA	NML dBA			Exceedance of NML dBA		
				Day	Evening	Night	Day	Evening	Night
R1	26 Kippax Ave, Leumeah	38/35	NCA 2	58	51	45	0	0	0
R2	42 Leicester St, Leumeah	42/39	NCA 2	58	51	45	0	0	0
R3	22 Kimberley St, Leumeah	45/42	NCA 2	58	51	45	0	0	0
R4	42 Kimberley St, Leumeah	43/36	NCA 2	58	51	45	0	0	0
R5	401 Pembroke Rd, Minto	38/34	NCA 2	58	51	45	0	0	0
R6	32 Collaroy Rd, Woodbine	42/41	NCA 1	64	57	48	0	0	0
R7	5 Soldiers Pl, Woodbine	43/41	NCA 1	64	57	48	0	0	0
R8	28 Queenscliff Dr, Woodbine	47/45	NCA 1	64	57	48	0	0	0
R9	38 Queenscliff Dr, Woodbine	47/41	NCA 1	64	57	48	0	0	0
R10	7 Bungan Pl, Woodbine	46/40	NCA 1	64	57	48	0	0	0
R11	19 Bungan Pl, Woodbine	43/39	NCA 1	64	57	48	0	0	0

Table 18: Predicted LAeq Construction Noise Levels – Phases 2 & 3

Rec.	Address	L _{Aeq} Construction Noise Level dBA	NCA	NML dBA			Exceedance of NML dBA		
				Day	Evening	Night	Day	Evening	Night
R1	26 Kippax Ave, Leumeah	32	NCA 2	58	51	45	0	0	0
R2	42 Leicester St, Leumeah	37	NCA 2	58	51	45	0	0	0
R3	22 Kimberley St, Leumeah	39	NCA 2	58	51	45	0	0	0
R4	42 Kimberley St, Leumeah	37	NCA 2	58	51	45	0	0	0
R5	401 Pembroke Rd, Minto	34	NCA 2	58	51	45	0	0	0
R6	32 Collaroy Rd, Woodbine	36	NCA 1	64	57	48	0	0	0
R7	5 Soldiers Pl, Woodbine	37	NCA 1	64	57	48	0	0	0
R8	28 Queenscliff Dr, Woodbine	41	NCA 1	64	57	48	0	0	0
R9	38 Queenscliff Dr, Woodbine	42		64	57	48	0	0	0
R10	7 Bungan Pl, Woodbine	44	NCA 1	64	57	48	0	0	0
R11	19 Bungan Pl, Woodbine	39	NCA 1	64	57	48	0	0	0

Table 19: Predicted LAeq Construction Noise Levels – Phase 4

Environmental Impact Statement
Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

Rec.	Address	<i>L_{Aeq}</i> Construction Noise Level dBA	NCA	NML dBA			Exceedance of NML dBA		
				Day	Evening	Night	Day	Evening	Night
R1	26 Kippax Ave, Leumeah	30	NCA 1	58	51	45	0	0	0
R2	42 Leicester St, Leumeah	36	NCA 1	58	51	45	0	0	0
R3	22 Kimberley St, Leumeah	39	NCA 1	58	51	45	0	0	0
R4	42 Kimberley St, Leumeah	35	NCA 1	58	51	45	0	0	0
R5	401 Pembroke Rd, Minto	32	NCA 1	58	51	45	0	0	0
R6	32 Collaroy Rd, Woodbine	34	NCA 2	64	57	48	0	0	0
R7	5 Soldiers Pl, Woodbine	35	NCA 2	64	57	48	0	0	0
R8	28 Queenscliff Dr, Woodbine	38	NCA 2	64	57	48	0	0	0
R9	38 Queenscliff Dr, Woodbine	37	NCA 2	64	57	48	0	0	0
R10	7 Bungan Pl, Woodbine	38	NCA 2	64	57	48	0	0	0
R11	19 Bungan Pl, Woodbine	34	NCA 2	64	57	48	0	0	0

During construction activities, the major potential sources of vibration are likely to include plant associated with excavation and bulk earthworks including rockhammers, excavators and compactors. Indicative vibrations are summarised in **Table 20**.

Table 20: Typical Vibration Emission Levels from Construction Plant

Plant Item	Rating / Description	Indicative Working Distance	
		Structural Damage (BS 7385)	Human Response (BS 6472) ¹
Small Hydraulic Hammer	(300 kg – 5-12t Excavator)	2 m	10 m
Medium Hydraulic Hammer	(900 kg – 12-18t Excavator)	5 m	25 m
Large Hydraulic Hammer	(1600 kg – 18-34t Excavator)	20 m	75 m
Vibratory Roller	< 50 kN (Typically 1-2 tonnes)	5 m	15 m
	< 100 kN (Typically 2-4 tonnes)	6 m	20 m
	< 200 kN (Typically 4-6 tonnes)	12 m	40 m
	< 300 kN (Typically 7-13 tonnes)	15 m	60 m
Excavator	≤ 30 t	10 m	15 m
Compactors	-	15 m	100 m
Dozer	-	2 m	10 m
Jackhammer	Hand held	1 m (Nominal)	Avoid contact with structure
Trucks	-	-	10 m

Potential sources of continuous noise emissions associated with the operation of the proposed facility include mechanical ventilation plant and equipment (generally roof-mounted), trucks entering the site and proceeding to the loading docks, loading and unloading activities, trucks within the external paved storage area and outbound truck movements. Other noise events likely to occur are of short duration and include reversing alarms as vehicles reverse into the loading docks and impacts generated during loading and unloading activities. Given the purpose of the facility is warehousing, no high noise level plant

Environmental Impact Statement
Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

or activities will operate inside the buildings. As such, noise breakout from within the facility will not be acoustically significant. On-site noise producing activities due to staff and visitor vehicles entering the site, doors slamming, engine start-ups and people conversing in the carpark are also expected however given the distances to the nearest surrounding residential properties, these activities are not considered to be acoustically significant.

Tables 21 and 22 summarise the predicted operational noise levels of the facility.

Table 21: Predicted LAeq(15 minute) Operational Noise Levels at Residential Receivers

Rec.	Address	Predicted <i>L</i> _{Aeq(15min)} Noise Level dBA	Criterion <i>L</i> _{Aeq(15min)} dBA		
			Day	Evening	Night
R1	26 Kippax Ave, Leumeah	34	53	47	43
R2	42 Leicester St, Leumeah	38	53	47	43
R3	22 Kimberley St, Leumeah	40	53	47	43
R4	42 Kimberley St, Leumeah	34	53	47	43
R5	401 Pembroke Rd, Minto	35	53	47	43
R6	32 Collaroy Rd, Woodbine	40	52	51	48
R7	5 Soldiers Pl, Woodbine	36	52	51	48
R8	28 Queenscliff Dr, Woodbine	40	52	51	48
R9	38 Queenscliff Dr, Woodbine	38	52	51	48
R10	7 Bungan Pl, Woodbine	36	52	51	48
R11	19 Bungan Pl, Woodbine	35	52	51	48

Table 22: Predicted LA1(60 second) Operational Noise Levels at Residential Receivers

Rec.	Address	Predicted <i>L</i> _{A1(60 sec)} Noise Level dBA		Sleep Disturbance Criterion <i>L</i> _{A1(60 sec)} dBA
		Reversing Alarms	Impacts	
R1	26 Kippax Ave, Leumeah	36	41	55
R2	42 Leicester St, Leumeah	39	46	55
R3	22 Kimberley St, Leumeah	43	49	55
R4	42 Kimberley St, Leumeah	36	46	55
R5	401 Pembroke Rd, Minto	35	45	55
R6	32 Collaroy Rd, Woodbine	42	43	58
R7	5 Soldiers Pl, Woodbine	42	44	58
R8	28 Queenscliff Dr, Woodbine	38	48	58
R9	38 Queenscliff Dr, Woodbine	43	39	58
R10	7 Bungan Pl, Woodbine	37	44	58

Environmental Impact Statement
Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

R11	19 Bungan Pl, Woodbine	36	44	58
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Vibration levels generated by the plant and equipment associated with the operational phase of the project will not give rise to significant levels of vibration. Therefore, the limits applicable to human comfort and building damage will be achieved at surrounding residential and industrial properties during the operational phase.

Based on the scenarios modelled for the operation of the proposed facility, continuous operational noise emissions due to HVAC plant operation, loading / unloading activities at the warehouse loading docks and the paved storage area and vehicular movements on-site comply with the project-specific assessment criteria for environmental noise emissions across all time periods. Short duration events such as reversing alarm operation and impact-generated noise will comply with the project-specific criteria applicable during the night time period for assessment of potential sleep disturbance.

Existing and projected traffic flows and corresponding noise emissions are summarised in **Table 23**. Based upon the network analysis and traffic demand modelling, the additional traffic generated by the proposal will not result in any significant increase in the existing levels of road traffic noise on the road network surrounding the site.

Table 23: Existing and Projected Peak Traffic Flows and Relative Noise Level Increase

Location	AM Peak		Relative Increase in Noise Level dBA	PM Peak		Relative Increase in Noise Level dBA
	Existing	Projected		Existing	Projected	
Culverston Rd	94	253	+4	79	248	+5
Airds Rd north of Culverston Rd	446	454	<1	620	628	<1
Airds Rd south of Rose Payton Dr	672	680	<1	885	893	<1
Rose Payton Dr	1449	1473	<1	1531	1556	<1
Campbelltown Rd north of Rose Payten Dr	4042	4106	<1	4413	4481	<1
Campbelltown Rd south of Rose Payten Dr	3329	3385	<1	3753	3813	<1

Although construction noise levels are predicted to achieve the management levels applicable at surrounding residential receivers, best practice mitigation and management measures are recommended to ensure noise emissions are minimised and these measures will be described in a construction noise management plan. The plan would be in accordance with the Interim Construction Noise Guide (ICNG), and would include:

- *Development of notification and negotiation procedure for receivers where noise impact cannot be mitigated to meet the criteria.*
- *A procedure for dealing with and responding to complaints.*

A detailed Construction Environmental Management Plan incorporating the recommendations of the Noise and Vibration Impact Assessment will be prepared post-approval.

6.6 SOILS AND WATER

6.6.1 Flooding and Stormwater

Environmental Impact Statement

Proposed Warehouse and Logistics Hub 5 and 9 Culverston Road, Minto

A Flooding and Stormwater Report has been prepared by Arcadis and is provided at **Appendix 10**. The report responds to the SEARs and Council's requirement for flooding, stormwater, water quality and wastewater assessment.

The Flooding and Stormwater Report provides assessment of existing and likely future flooding scenarios for the site. **Table 24** summarises the 100 year ARI flood levels at 21 locations in proximity to the site. These locations are shown in **Figure 11**.

Table 24: Main Waterways 100 year ARI Water Levels		
Waterway	Location (see Figure 8)	Water Level* (mAHD)
Bow Bowing Channel	1	45.75
	2	46.80
	3	48.50
	4	49.75
	5	50.2
Formalised grass channel to the south (Rose Payten Drive side)	6	50.20
	6a	50.20
	7	50.20
	8	50.80
	8a	51.30
Formalised fabriform channel within the site	9	48.05
	10	47.50
	11	47.11
	12	47.05
Formalised fabriform channel to the north	13	48.90
	14	47.00
	15	46.00
	16	45.85
	17	45.70
	18	45.70
Culverston Road	19	46.25
	20	46.50
	21	48.05



Figure 11: Flood Level Locations

Environmental Impact Statement

Proposed Warehouse and Logistics Hub

5 and 9 Culverston Road, Minto

Figure 12 maps the 100 year and probable maximum flood (PMF) levels on the site.

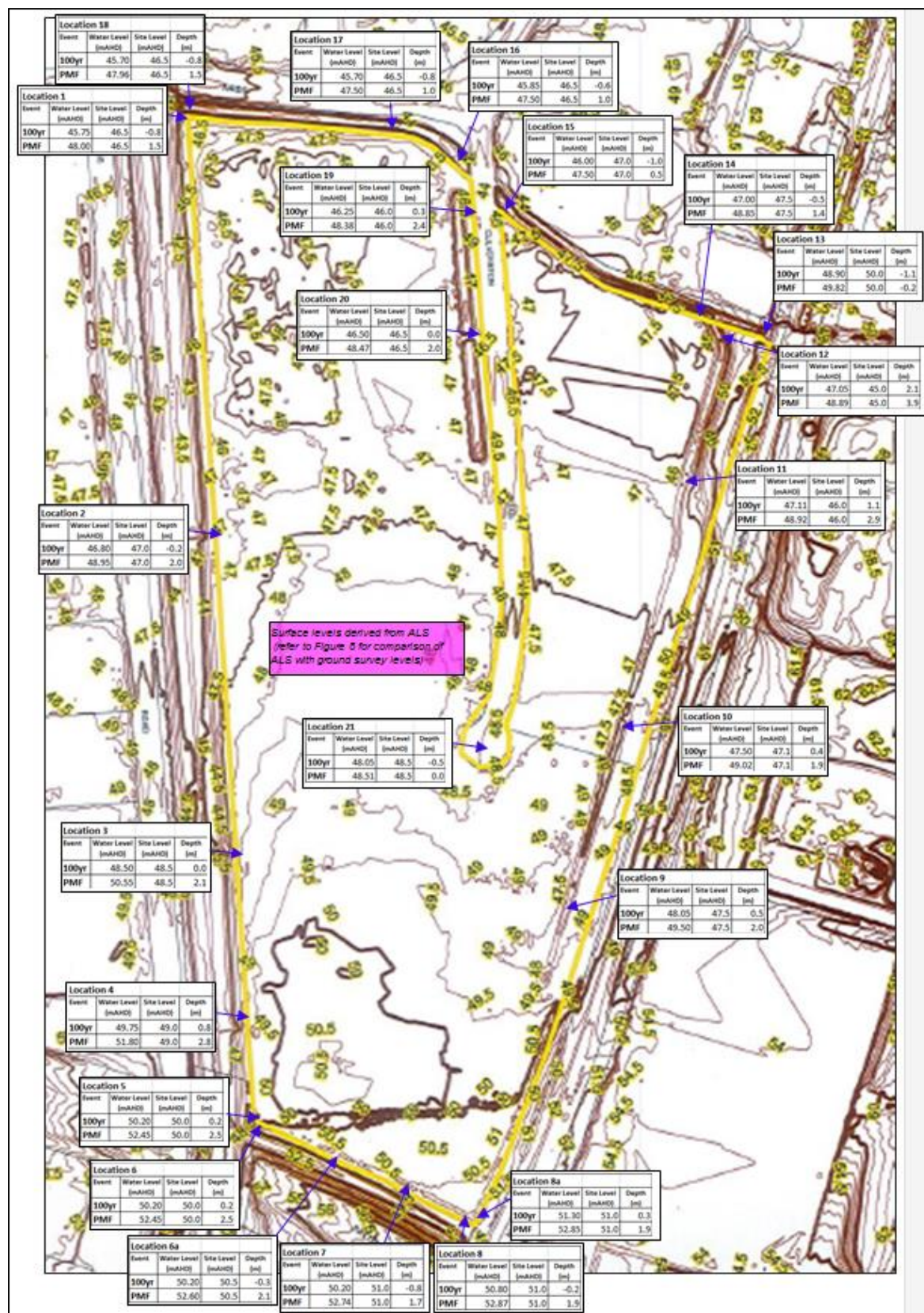


Figure 12: 100 year and probable maximum flood (PMF) levels

Environmental Impact Statement

Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

The Aerial Laser Survey presented in **Figure 11** indicates limited intrusion of the 100 year flood into the south western corner of the site. However traditional ground survey has revealed lower ground levels in the south western corner of the site and when compared to the council levels in this area, the intrusion is in the order of 0.2m to 0.4m in the 100 year flood. Council's regional flood models were requested during consultation, however they declined owing to the perceived limited flood risk of the site. Further details of this meeting are provided within the Flooding and Stormwater Report.

In accordance with the CDCP2015 the development is to have a ground surface level at or above the 100 year average recurrence internal (ARI) flood level.

Further to the above, it is noted within the report that *'while the main waterway flood levels define flood levels around the perimeter of the site, drainage analysis and future design of the site stormwater systems is necessary to determine local flood levels across the site.'*

Future design of the minor and major drainage systems is required to have the following capacities:

- *Minor (pit and conduit) systems are to have minimum 10 year ARI capacity, with 20 year ARI capacity for major road crossings.*
- *Major (road/surface overland flow) systems are to be designed for 100 year ARI low hazard conditions.*

Major and minor system performance is required to recognise the downstream (bounding waterway) flood levels. Future analysis is to include:

- *Determination of sub-catchment areas and impervious percentages;*
- *Re-use of existing stormwater systems and discharge locations (based on available information). Typically re-use of existing outlet structures will be considered.*

The Concept Drainage Plan provided within **Appendix 10** outlines preliminary flooding and stormwater management for the development, indicating:

- *The potential re-use of existing drainage systems and connections where possible;*
- *Demolition of existing stormwater infrastructure and inclusion of new drainage systems to accommodate the proposed development;*
- *Where it is determined that new drainage systems are necessary, it is intended to maintain general sub-catchment flow distributions to the major waterways bounding the site, and discharge at existing discharge locations (avoiding additional and re-located discharge locations into the bounding waterways where feasible);*
- *Retention of existing neighbouring property stormwater connections, during construction and completion of the development.*
- *Site fill is anticipated so as to comply with flood planning levels, and to achieve minimum gradings for site drainage including runoff and overland flowpaths in the storage areas, carparks and loading dock areas.*

Based on the above, the proposed concept design is subject to further assessment of the main waterway flood levels and extents. Furthermore, site grading fill and minimum development levels are subject to within site stormwater analysis and design, which is to be carried out as part of future design.

It is noted that in discussions with CCC, it has been determined that on-site detention is not required since the existing site is essentially fully impervious, and it is proposed to generally retain current site flow distributions in the proposed re-development

Environmental Impact Statement

Proposed Warehouse and Logistics Hub

5 and 9 Culverston Road, Minto

Advice received from Council in relation to the Probable Maximum Flood (PMF) has been summarised as follows:

- the site would be inundated by water depths of several metres over much of its area;
- there would be little warning (possibly of the order of only 10 minutes) due to the catchment urbanisation and short rainfall/runoff response times, yet inundation would be expected to subside quickly, between 1.5-3 hours.

The site has been raised above the 1% AEF (1:100 year flood event) as required by Council's guidelines. The final level of the site results in no flood extent within the site as the extent remains within the 4 open drainage channels surrounding the site. Access was requested to the flood model in order to undertake sensitivity testing of the extents, however this was rejected by council, stating that it is not Council practice to make the flood model available to private developers.

As identified by Council, the site flooding in extreme PMF events would result from very short duration storms that potentially produce significant flows in this area. Such events, coming with little or no response time, mean that the only realistic safe option in extreme flood events is for persons to seek on-site refuge in buildings with floor levels above defined probable maximum flood (PMF) levels. With respect to evacuation, since hazardous flows would subside with the storm duration, evacuation would not be impeded by remnant flood waters on the catchment. A Local Flood Plan is to be prepared for the Site development that includes:

- on-site refuge facilities, within buildings that are to be structurally stable during a PMF event.
- development of a means to inform all users of the site on how to respond and reach the refuge facilities in major flood events;
- collaboration with CCC and State Emergency Services in developing the Local Flood Plan. In particular, addressing evacuation and clean up procedures.

The Flooding and Stormwater Report also provides consideration of stormwater quality based on MUSIC modelling. The results of MUSIC modelling are provided within the Flooding and Stormwater Report. The MUSIC model layouts for existing and proposed conditions are shown in **Figure 13**. A gross pollutant trap (GPT) is included in the proposed conditions which is considered standard practice for an industrial site. The GPT included in the model is representative of GPT's being placed on all stormwater lines that discharge from the site into the surrounding waterways. Given the significant volume of truck movements that will occur on the site it is also considered appropriate to select a GPT that will also be capable of capturing hydrocarbons or a separate oil/grit separator installed.

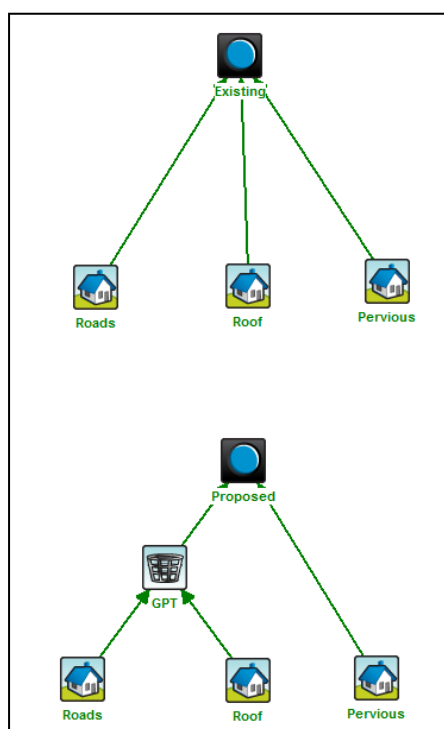


Figure 13: MUSIC Model Layouts for Existing and Proposed Conditions

The existing and proposed pollutant loads are presented in **Table 25** which demonstrates a clear reduction in pollutant loads, resulting from:

- Replacing significant roads/pavements areas, which have relatively high pollutant loads, with warehouse roofs which have relatively low pollutant loads.
- Incorporating gross pollutant traps which are responsible for the significant reduction in gross pollutants and TSS.

Table 25: Existing and Proposed Average Annual Pollutant Loads				
Scenario	Pollutant Loads (kg/year)			
	Gross Pollutants	TSS	TP	TN
Existing	5,200	68,700	116	482
Proposed	560	24,000	81	432
% Change	-90%	-65%	-35%	-10%

The Flooding and Stormwater Report also provides a site water balance in order to identify any potential impacts on surface water and groundwater resources and assess management options where appropriate.

Given that rainfall-runoff processes dominate the water balance for the site, a site water balance model was established using MUSIC for both existing and proposed conditions. A 10 year period of rainfall was selected which includes a range of rainfall depths across both wet and dry years. Other components of the site water balance include potable water supply from Sydney Water and wastewater discharge to sewer, although the volumes associated with these are relatively minor and have not been assessed in detail.

Preliminary annual water demands for the Proposal have been estimated based on 400 operational employees with an average demand of 150 L/day resulting in a water demand of

Environmental Impact Statement

Proposed Warehouse and Logistics Hub

5 and 9 Culverston Road, Minto

approximately 10 ML/yr. No other significant water demands or industrial water usage are proposed. No extraction from any surface water or groundwater resources is proposed. However, further consideration will be given to rainwater harvesting as a source of non-potable water as discussed further below.

Wastewater generation, allowing for an 80% sewer discharge factor relative to the water demands, is estimated to be approximately 8 ML/yr. This is proposed to be discharged to sewer.

The water demands and wastewater generation associated with the current land use for the site are unknown. However, the increase in warehouse area relative to existing suggests that demands for the proposed development will be higher than existing.

Surface areas for the existing site land uses have been estimated from aerial photos in order to inform rainfall runoff processes. The existing site includes significant impervious areas (28 ha), consisting largely of roads/pavements (27 ha) and a small roof area (0.7 ha). The remaining area (2.1 ha) is pervious and is grassed or treed. Overall the existing site is approximately 95% impervious and 5% pervious. The proposed conditions maintain the total imperviousness of the site at approximately 28 ha, however the roof area is proposed to increase to 11 ha and the road/pavement area reduced to 17 ha. The pervious area remains approximately the same and accordingly rainfall runoff processes will remain largely consistent with the existing.

Based on the above, the average annual water balance for the site is shown in **Figure 14**. This demonstrates that the existing and proposed water balances are almost identical and hence impacts as a result of the development are considered to be minimal and no additional mitigation measures required.

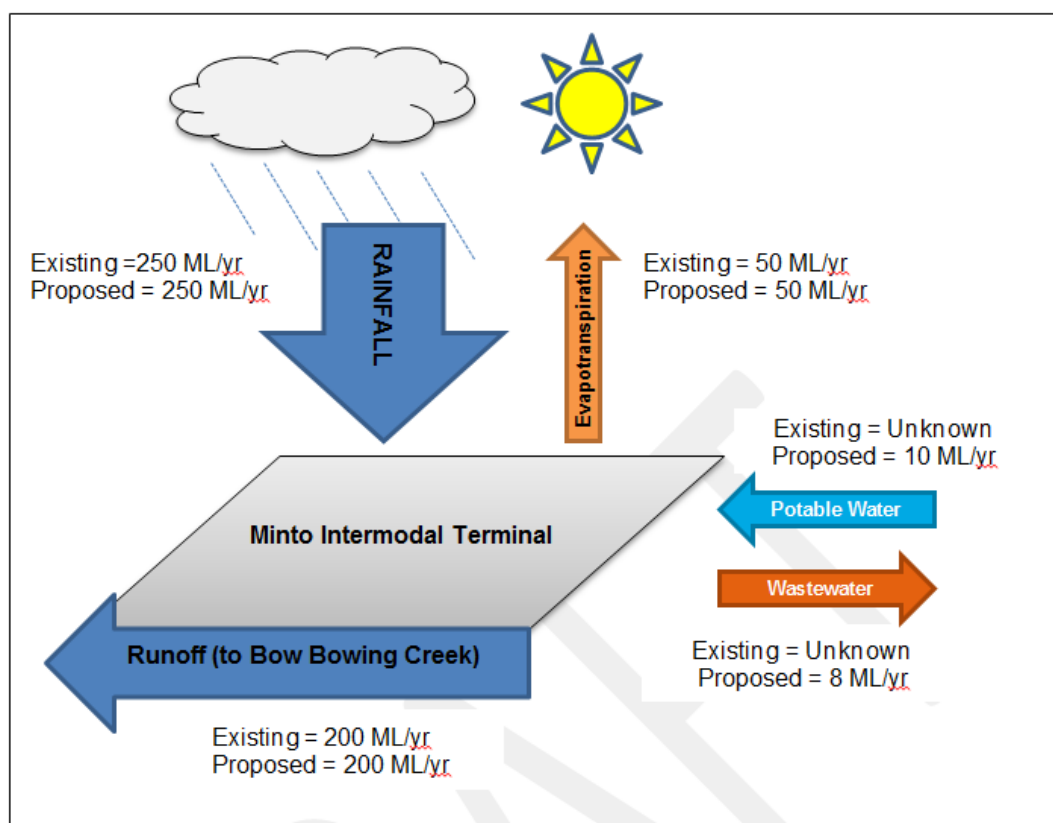


Figure 14: Site Water Balance for Existing and Proposed Conditions

6.6.2 Erosion and Sediment Control

Erosion and sediment controls are provided within the Flooding and Stormwater Report (**Appendix 10**) and include:

- Sediment Basins;
- Hay Bales;
- Silt Fences;
- Inlet filters;
- Diversion channels; and
- Stabilised site access and truck wash-down area.

Further details of erosion and sediment controls are provided within **Appendix 10**.

6.6.3 Geotechnical Investigation

A Geotechnical Investigation has been prepared by Golder Associates Pty Ltd and is provided at **Appendix 11**. The objectives of the investigation were to assess the subsurface conditions, including soil/rock profiles, and to provide preliminary recommendations for development. A Contamination Assessment Report comprising a Phase 1 Preliminary Site Investigation and Limited Phase 2 Detailed Site Investigation was completed concurrently to the geotechnical investigation.

The Geotechnical Investigation describes the site's ground conditions as comprising quaternary paleochannel deposits, including fluvial sand, clay and silt, underlain by Ashfield Shale and Hawkesbury Sandstone. The site is not known to contain any acid sulphate soils. Boreholes at eight locations on the site revealed topsoil only on the edges of the site and consisting of clays and silts, an asphalt or concrete hardstand surface over the majority of the site, fill comprising of medium plasticity silty clay, clay and sandy clay with some angular gravel, two soil stockpiles and alluvium material comprising high plasticity grey and brown clay.

The following comments and recommendations are presented for earthworks and general site preparation:

- *Prior to any construction on site, the proposed building footprint and pavement areas should be stripped of any remaining vegetation, topsoil, and root affected or otherwise deleterious material and hardstand materials. This material should be either disposed to spoil or stockpiled for later landscaping purposes. Stripping on this site is expected to be required to depths up to 0.4m, with an average depth of approximately 0.2 m.*
- *Following site stripping and prior to placement of any fill to raise site levels, the exposed subgrade materials should be proof rolled. The proof roll should be carried out with a minimum 10t smooth drum roller in the presence of an experienced earthworks practitioner. Any identified soft or "unsuitable" zones should be removed and backfilled.*
- *The medium plasticity silty clay fill should be reused with caution. Details on preparation and treatment of this material is provided in Section 5.3*
- *Approved materials required beneath proposed road and parking areas for bulk filling should be placed in layers not exceeding 300 mm loose thickness and compacted to a minimum density ratio of 95% Standard Maximum Dry Density (SMDD) (AS1289-5.1.1 or equivalent). Clayey fill should be placed and maintained at 60% to 90% of standard Optimum Moisture Content (OMC).*
- *Where engineered fill is required beneath the proposed building structures, it should be compacted to a minimum density ratio of 98% SMDD within $\pm 2\%$ of OMC. The*

fill used to support structures should be nominated by the contractor and approved by an experienced geotechnical engineer.

- *Trafficability of the medium plastic clayey soils will be reduced upon wetting. Surface improvements such as placement of a gravel layers may need to be considered to establish suitable working platforms.*
- *Any additional filling should be placed and compacted in accordance with Campbelltown City Council's engineering guidelines for filling, and as described in Australian Standards AS3798-2007 Guidelines on Earthworks for Commercial and Residential Developments. Filling on site should be compacted under Level 1 Monitoring and Testing as described in Australian Standards AS3798-2007.*

The report states that all soil units should be able to be excavated using a hydraulic excavator or bulldozer whilst excavations of the hardstand (Unit 1B) may require a jack-hammer or ripping attachment. Contractors should be provided with the borehole logs and photographs and make their own assessment on the suitability and productivity of specific plant. Plant used for excavation could produce vibrations with the potential to impact services adjacent to the work. If existing services are near to excavations the report suggests that an assessment be made of the risks associated to the services prior to the commencement of the excavation.

Groundwater was observed between 4.4 m and 6.3 m depth below the ground surface and is not expected to be encountered within the likely depths of proposed excavation works (typically, less than 1 m, based on the available details of proposed development). If groundwater is encountered during the works the geotechnical consultant should be contacted to assess the need for subsoil drainage or other provisions. Surface water flows should be diverted away from open excavations.

The report also identifies potential for the reuse of clayey fill soils for bulk filling of the site or pavement subgrade materials. The report however clarifies that the soils are not considered suitable as pavement base or sub-base materials. The report provides further recommendations for pavements, slabs and foundations.

Testing of soil samples for Emerson class determined that the materials tested have an Emerson class number of 5, constituting non-dispersive behaviour. The relatively flat topography of the site further reduces the risk of soil dispersion and erosion. It is noted however that soils have the potential to become dispersive when remoulded due to the break-down of soil bonds. The report recommends the implementation of erosion control to prevent sediments entering surrounding waterways. The report also recommends that soils are not subjected to concentrated water flow.

Additional investigation locations are advised to better inform designers of the potential geotechnical risks associated with:

- The varying thicknesses of fill across the site and potential ground improvement options;
- Identification of the former watercourse, which may contain deeper alluvial soils, gravels or compressible cohesive material; and
- Engineering behaviours of the soils across the site to support the proposed structures, pavements and for material reuse.

The report recommends that further investigations comprise additional boreholes, test pits, laboratory testing and potentially geophysics to provide better spatial subsurface information. Further investigations may be undertaken post-approval.

6.6.4 Contamination

A Phase 1 and limited Phase 2 Environmental Site Assessment has been prepared by Golders Associates Pty Ltd and is provided at **Appendix 14**. The assessment has been carried out in accordance with the NSW Environmental Protection Authority (EPA) endorsed *Guideline for Consultants Reporting on Contaminated Sites* (OEH, 2011).

Based on the findings of the Phase 1 ESA, Golder established that key potential sources of contamination for the site are generally related to historical filling and ongoing use of the site for vehicle storage and logistics. In summary the report determines that:

- *There is medium to high potential for soil and groundwater contamination due to historical activities within the site, particularly associated with the fuel storage facilities and historic filling of the Site with materials from an unknown source; and*
- *There is a low potential for impacts to soil and groundwater due to historical activities off-site.*

The purpose of the Phase 1 ESA is to provide an interpretation of the site history assessment and observations made during the site walkover as they relate to potential environmental contamination. Information reviewed indicates the site appeared to be undeveloped from at least the 1940s until the 1970 and had previously been owned by a dairyman, private occupier and then the State Planning Authority. The majority of the site is sealed with hardstand and generally appears in good condition with minor cracking and potholing. At the time of the site inspection, the Above Ground Storage Tanks (ASTs) were appropriately bunded, paint and associated chemicals were appropriately stored and both fuel and chemicals appeared suitable to contain potential spills. A small excavation of potentially-impacted odourous soils was present in the vicinity of the ASTs. Site facilities were observed to be clean, and no evidence of spills, leaks or other obvious contamination was observed. Observations from the aerial photographs show that there was filling in the Site in the early 1970s from unknown sources. The use of the Site as a vehicle storage and logistics facility, including the storage of fuels and the historic filling of the site presents a medium to high potential for soil and groundwater contamination to be present on the site.

An assessment of the soil and groundwater quality at nominated locations positioned along the axis of inferred groundwater flow, indicates that the concentrations of reported analytes in both soil and groundwater were generally less than guidelines for the protection of human health, and ecological receptors within the nearby fresh water receiving environment. An exception was the elevated concentrations of cadmium and zinc. Cadmium was not reported as an exceedance at the downgradient site boundary, hence the risk to fresh water receptors is considered to be low. The zinc exceedances were reported in groundwater entering site from both the south and eastern boundary and are therefore more likely to be indicative of natural background conditions. It is noted that the Phase II contamination investigation was limited as Golder was unable to access portions of the Site for intrusive investigations in closer proximity to the higher risk activities on the site. Further investigations are warranted and will be undertaken pertaining to a full Phase II investigation which will be submitted at the Response to Submissions stage of the assessment of this application. Should a Remediation Action Plan be required, this will be submitted as part of the proposal.

Based on the results of the investigation, conditions on site are unlikely to prevent the proposed commercial/industrial redevelopment. However, due to the limitations of this investigation, there is potential for undetected contaminated soil and or groundwater to be present in the central portion of the site. As such, further, post-approval investigations are warranted during the future development, and remediation and or management may be required in selected areas of the site.

AIR QUALITY

An Air Quality Assessment has been prepared by Wilkinson Murray Pty Limited and is provided at **Appendix 12**.

Based on the existing ambient air quality measured from the closest NSW EPA air quality monitoring station which reveals that existing regional air quality is well below NSW air quality objectives, the area is identified as having capacity for additional development.

In relation to construction activities the Air Quality Assessment identifies that due to prevailing wind directions, the closest residential receivers would be unlikely to be impacted by construction activities. However there is potential for air pollution due to suspended dust particles at neighbouring industrial sites caused by wind or traffic generated on hardstand areas. A construction air quality management plan should be developed considering the following measures to minimise the potential for dust generation:

- *letter box drop to noise sensitive receivers to inform them of potential work that could result in dust;*
- *minimising the area of disturbance as far as practicable during works;*
- *promptly stabilising/revegetating disturbance areas;*
- *air quality complaints handling procedure;*
- *monitoring of dust emissions during construction to confirm compliance;*
- *minimising drop heights for materials being worked on the site;*
- *keeping exposed surfaces moist;*
- *limit vehicle speeds on the construction site to less than 30 km/h; and*
- *ensuring trucks are covered and do not track sediment onto public roads.*

Diesel emissions from off road plant and equipment have also been considered in the air quality assessment of construction. Exhaust emissions of particulates, oxides of nitrogen (NOx), carbon monoxide and hydrocarbons can be expected from off road construction vehicles working on the site. To minimise off road vehicle emissions the construction air quality management plan, where practical, would develop procedures where off road vehicle emission are limited by reducing idling and ensuring equipment is correctly maintained. Where practical, diesel equipment will be used with best available diesel emissions standards.

In relation to operations, the Air Quality Assessment states that the proposed facility is not expected to generate a significant amount of air emissions and is well separated from sensitive land uses. The primary source of emissions would be from traffic with exhaust emissions of particulates, oxides of nitrogen (NOx), carbon monoxide and hydrocarbons derived from vehicles travelling to and from the site. It is expected that all vehicles accessing the warehousing and logistic facilities would have compliance with relevant and current emission standards as prescribed in Australian design rules. Based upon the network analysis and traffic demand modelling, the additional traffic generated by the proposed facility will not result in any significant increase in air quality on the road network surrounding the project.

It is concluded that air quality impacts from the proposed construction and operation are low risk and it is recommended that a construction air quality management plan be developed to implement reasonable and feasible measures to control particulate emissions from fugitive dust sources and off road diesel vehicles.

6.7 INFRASTRUCTURE REQUIREMENTS

An Infrastructure Report has been prepared by Arcadis and is provided at **Appendix 13**. The purpose of the report is to summarise the findings of a Dial Before You Dig (DBYD) search in order to identify existing authority assets within and around the proposed development. The

Environmental Impact Statement

Proposed Warehouse and Logistics Hub

5 and 9 Culverston Road, Minto

report also identifies the relevant owner and authority of each utility and provides preliminary advice on the suitability of each utility for future connection.

Potable Water

Based on the results of the Dial Before You Dig (DBYD) the following Sydney Water assets have been identified in the vicinity of the site:

- Ø200mm water main located in the western side of Culvertston Road;
- Ø200mm water main located in the western side of Airds Road;
- Ø250mm water main located in the northern side of Airds Road;

The main in Culvertston Road is preferred for the development connections. Each lot will be provided with an individual domestic water and fire services connection to the authority main. Preliminary investigation indicate that the Sydney Water network is not anticipated to be upgraded. However the report recommends that a Feasibility Application is lodged with Sydney Water as soon as possible to confirm suitable connection points. This will be done during assessment of the subject application.

Sewer

Based on the results of the DBYD the following Sydney Water assets have been identified in the vicinity of the site:

- Ø1350mm reinforced concrete (RC) sewer located along the northern side of the development. A number of Ø225- Ø300mm connections are extended to the development. Those connection can be potentially utilised by the warehouses.
- Ø552mm vitrified clay (VC) sewer located along the northern border and is partially in rehabilitation.
- Ø300-375mm vitrified clay (VC) sewer along the western boundary.

Due to the extensive scale of the development several sewer connections may be required to the Sydney Water infrastructure to ensure gravity connection of the buildings. While some upgrades to the existing Sydney Water network may be necessary, it is likely that the existing sewer network would have sufficient capacity to service the proposed development. However the report recommends that a Feasibility Application be lodged with Sydney Water during future stages of the development to confirm suitable connection points for the development and any upgrades to the existing network that may be required.

Gas

Based on the results of the DBYD the following Jemena assets have been identified in the vicinity of the site:

- Ø32mm@ 210kPA network gas main located in the western side of Culvertston Road.
- Ø150mm @ 1050kPA secondary main located in the northern and western side of Airds Road.

The main in Culvertston Road is preferred for the development connections. The assumption is that gas will be used only to provide the hot water service in the amenity areas and that accordingly demand for gas will be minimal. It is likely that the existing Jemena network would have sufficient capacity to service the proposed development, subject to a commercial agreement.

Environmental Impact Statement

Proposed Warehouse and Logistics Hub

5 and 9 Culverston Road, Minto

Electrical

The electrical supply authority for the area is Endeavour Energy. An existing kiosk substation located at the end of Culverston Rd adjacent to the roundabout services the area. High voltage is reticulated along Culverston Rd from Airids Rd. Contact has been made with Endeavour Energy and information regarding the existing electrical infrastructure can be provided following payment through an enquiry application during future stages of the development.

Based on assumptions of Endeavour Energy's standard kiosk sizes, the kiosk substation servicing the existing development of the site is estimated to have a capacity of 1MVA or 1.5MVA. Based on this assumption, the existing kiosk substation is unlikely to have sufficient capacity to serve all of the new development. However, utilising this substation is considered acceptable, as it may be possible to utilise this existing asset to provide power to approximately half of the site.

Further to the above, DBYD details show an Endeavour Energy asset heading east from the kiosk substation terminating in the development, however it is not clear what this is serving. As part of the design process with Endeavour Energy this asset will need to be removed/relocated. Any existing low voltage connections within the development site will be decommissioned as the site is developed.

Telecommunications

Based on the DBYD information received there are multiple telecommunications services in the area. AAPT have a fibre optic service that runs within Airids Rd along the north and west boundaries of the site. This service may require relocation as a result of the development. NBN does not have services in this area.

An application for NBN services has been lodged, however no agreement has yet been confirmed regarding the provision of NBN services to the development. If NBN services are not provided to the site, discussions will be required with Telstra to provide suitable telecommunications to the site.

Loads

The estimated loads required for the proposal are summarised in **Table 26**.

Table 26: Estimation of load requirements per service	
Service	Load
Water Service: ▪ Domestic water flow ▪ Fire service	10l/s Tank make up flow available from the main
Sewer Service	8l/s
Gas Service	1600MJ/day
Electrical	3.1MVA

Table 27 provides a summary of the power demands of the proposed facility. As there is currently insufficient electrical load capacity on site as detailed above, the supply will need to be upgraded. Subject to confirmation with Endeavour Energy, it is considered that the existing kiosk substation may be capable of providing approximately half of the development load. Due to the size of the site it is proposed to request an additional supply to the site from another kiosk substation located further north up Culverston Rd. Another 1.5MVA kiosk substation could provide power to the remainder of the development, resulting in a combined load of 3MVA. The maximum demand of 3.1MVA estimated at this stage is considered to be reducible below 3MVA during detailed design. New main switchboards for the development

Environmental Impact Statement
Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

would need to be located adjacent to the kiosk substations to reticulate low voltage power to the development.

Table 27: Summary of Power Demands			
Area	m²	VA/m²	Power (kVA)
Warehouse 1A	40,000	25	1,000
Office	2,000	100	200
Warehouse 1B	22,000	25	550
Office	1,000	100	100
Warehouse 1C	22,000	25	550
Office	1,000	100	100
Warehouse 1D	23,000	25	575
Office	1,000	100	100
Carpark/Loading Bay	127,800	10	1,278
		Total	4,453kVA
		With 70% diversity	3,117kVA

6.8 ECOLOGICALLY SUSTAINABLE DEVELOPMENT AND GREENHOUSE GAS AND ENERGY EFFICIENCY

A Sustainability Management Plan has been prepared by Arcadis and is provided at **Appendix 19**. The Sustainability Management Plan investigates and identifies all potential ecological sustainability initiatives with a focus on energy savings and recommendations for possible heating and cooling system to be used on site.

The report provides an assessment of the proposal against Section J of the BCA which provides minimum requirements for energy efficiency. The report states that:

- All building fabric will achieve the requirements of BCA Section J1;
- All glazing will comply with the BCA;
- Thermal efficiency for hot water systems will be at least 80% as per BCA Section J7;
- All fittings and fixtures are of the highest or within 1 star of the highest available star rating;
- Translucent roof sheeting will optimise natural light and reduce the need for artificial lighting;
- The total lighting power load will be in accordance with BCA Section J6;
- It is recommended to select a HVAC solution with high ongoing efficiencies and high levels of fresh air.
- It is recommended to use air conditioning units with a minimum EER/COP of 3.0 for heating and cooling and natural ventilation will be provided.

The report also identifies areas for investigation during detailed design including the provision of shading to north facing windows, a gas-boosted solar hot water system and energy efficient technologies for artificial lighting.

Further to the above, the ESD report quantifies the estimated lighting loads for the office and warehouse components of the proposed development. Based on the BCA standard maximum illumination density for an office of 9W/m², the illumination power density adjustment factor 0.9 (motion sensors) and the proposed 24 hour operation. **Table 28** summarises the energy consumption of the office lighting load.

Environmental Impact Statement

Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

Table 28: Estimated annual energy consumption from the office lighting

Office	Office (m ²)	Maximum Allowable Lighting Load (kW)	Estimated Annual Energy Consumption (kWh)
Warehouse 1A	2,000	18	141,523
Warehouse 1B	1,000	9	70,762
Warehouse 1C	2,300	21	162,752
Warehouse 1D	1,000	9	70,762
Total	6,300		445,798

Based on the BCA standard maximum illumination density for an office of 10W/m², the illumination power density adjustment factor 0.9 (motion sensors) and 0.6 (daylight, PE sensors) and the proposed 24 hour operation, **Table 29** summarises the energy consumption of the warehouse lighting load.

Table 29: Estimated annual energy consumption from the office lighting

Office	Warehouse (m ²)	Maximum Allowable Lighting Load (kW)	Estimated Annual Energy Consumption (kWh)
Warehouse 1A	40,000	400	1,886,976
Warehouse 1B	22,000	220	1,037,837
Warehouse 1C	22,000	220	1,037,837
Warehouse 1D	23,000	230	1,085,011
Total	107,300		5,047,661

Based on the calculations summarised in **Tables 28** and **29** the maximum load acceptable by the BCA is calculated at 71kWh/m² for the office area and 47kWh/m² for the warehouse area. The report recommends that the following measures are considered in the design phase to reduce the electrical load of the facility by 40-50%:

- Provide efficient LED lighting throughout.
- Daylight sensors to all areas with natural daylight.
- Occupancy sensors to low occupancy areas e.g. office, toilets, stairwells, lift lobbies and kitchens.
- Occupancy sensor controls: Motion detectors can be installed in rooms, supplying light only when required. Sensors need to be positioned accurately to avoid significant blind spots.
- Photo-electric sensors: Photo-sensors sense ambient light conditions, to determine the level of artificial lighting required for an area. The unique daylight dimming enables the lighting to react to changes in ambient lighting levels contributing to significant reductions in base load.
- Dimming Devices: Dimming devices allow light levels to be reduced where required. This may be to allow for daylight, or to compensate for reduced light levels over time.
- Provide LED external lighting for all outside areas.
- External lighting will be controlled via time clock and daylight sensors.
- Colour of walls and ceilings: Light colours reflect more light and reduce the need for artificial lighting; and
- Lighting layouts should also take into consideration different lighting zones within the facility.
- The optimum lighting levels vary for different activities as outlined by the Australian Standards. Efficient lighting programs implemented should achieve the recommended luminance levels for the given tasks.
- In summary, lighting densities should be considered for all areas in relation to the task to be performed.

Environmental Impact Statement

Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

The report also provides targets and strategies for waste minimisation. In particular, the *NSW Waste Avoidance and Resource Recovery Strategy 2014-21* target of 80% recovery rate of construction and demolition waste may be achieved by reusing and recycling the following waste streams:

- Vegetation
- Asphalt
- Virgin Excavated Natural Material (VENM) and Excavated Natural Material (ENM)
- Concrete
- Bricks / pavers / tiles
- Metals – ferrous and non-ferrous.

To support waste minimisation the report establishes the need for the formulation of a Construction Environmental Management Plan and Operational Environmental Management Plan. The Waste Management Assessment at **Appendix 15** responds to this recommendation by providing detailed assessment of waste generation and appropriate methods of re-use, recycling and disposal.

To support the sustainability initiatives detailed within the report, monitoring, measuring and reporting will be undertaken in accordance with the recommendations of the Sustainability Management Plan which include energy and water sub-metering and a comprehensive building users' guide.

Performance criteria for material selection are also outlined as follows:

- Materials that promote indoor air quality (eliminate or minimise materials containing Volatile Organic Compounds (VOC's);
- Materials that reduce material use (e.g. recycled materials) and which have low impact disposal;
- Low embodied energy materials (to be assessed on a life cycle basis);
- Materials that are durable and fit for purpose;
- Materials from sustainable sources i.e. renewable sources, no rainforest timber;
- Materials that do not contain chlorine (e.g. PVC use to be reduced); and
- Local materials with low embodied transport energy.

Further to the above the report documents sustainability factors associated with a number of common construction and fit-out building materials.

Finally, the sustainability initiatives recommended in the Sustainability Management Plan will be implemented in the construction and operation phases of the development as relevant and where practical and feasible. The measures will be monitored accordingly to ensure compliance with the BCA Section J, relevant Council policies and site-specific targets and ensure an optimum sustainability outcome for the development.

6.9 WASTE

Construction and operational waste and recycling have been addressed in the Waste Management Assessment prepared by Arcadis and provided at **Appendix 15**.

The types and quantities of waste to be generated during construction are summarised in **Table 30**.

Environmental Impact Statement
Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

Table 30: Waste generated during operations				
Waste Type	Classification	Estimated Quantity	Reuse/ Recycling	Disposal
Demolition				
Vegetation	General Solid Waste (nonputrescible)	Area of vegetation to be removed yet to be determined, (up to 40,000 m2)	Transferred off-site for re-processing / recycling / reuse	Any element unable to be reused or recycled will require disposal at an appropriately licensed facility
Concrete / asphalt pavement	General Solid Waste (nonputrescible)	Area of pavement to be removed is yet to be determined, but could be up to 260,000 m2	Either re-processed on site or transferred off-site for reprocessing	Any element unable to be reused or recycled will require disposal at an appropriately licensed facility
Existing structures - Hail mesh structure	General Solid Waste (nonputrescible)	Hail mesh approx. 150,000 m2 plus support structure	Assume sold and reused	Any element unable to be reused or recycled will require disposal at an appropriately licensed facility
Existing structures - Existing building	General Solid Waste (nonputrescible)	Building footprint approx. 7,300 m2	Transferred off-site for re-processing / recycling / reuse	Any element unable to be reused or recycled will require disposal at an appropriately licensed facility
Existing structures - Wash bays	General Solid Waste (nonputrescible)	Building footprint approx. 850 m2	Transferred off-site for re-processing / recycling / reuse	Any element unable to be reused or recycled will require disposal at an appropriately licensed facility
Existing services - Stormwater	General Solid Waste (nonputrescible)	Infrastructure to be removed is yet to be determined, but could include culverts, pipes, fittings, geotextiles, pits and grates	Transferred off-site for re-processing / recycling / reuse	Any element unable to be reused or recycled will require disposal at an appropriately licensed facility
Existing services - Water - Sewer - Gas - Electricity - Tele-communications	General Solid Waste (nonputrescible)	Removal of existing infrastructure will be dependent upon the likelihood of upgrade	Transferred off-site for re-processing / recycling / reuse	Any element unable to be reused or recycled will require disposal at an appropriately licensed facility

Environmental Impact Statement
Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

Table 30: Waste generated during operations				
Waste Type	Classification	Estimated Quantity	Reuse/ Recycling	Disposal
Construction				
VENM and ENM	General Solid Waste (nonputrescible)	Quantities yet to be determined	On-site re-use and/or taken off-site for recycling / reuse / reprocessing, where relevant.	Any element unable to be reused or recycled will require disposal at an appropriately licensed facility
Contaminated soil	To be determined	Quantities yet to be determined, if any	N/A	Treatment and disposal
Concrete	General Solid Waste (nonputrescible)	Volume of concrete required at site is yet to be determined, however a quantity of concrete wasted will be minimised through construction management processes	Either re-processed on site or transferred off-site for reprocessing	Any element unable to be reused or recycled will require disposal at an appropriately licensed facility disposal
Asphalt	General Solid Waste (nonputrescible)	Volume of concrete required at site is yet to be determined, however a quantity of asphalt wasted will be minimised through construction management processes	Either re-used / reprocessed on site or transferred off-site for reuse / re-processing	Any element unable to be reused or recycled will require disposal at an appropriately licensed facility
Timber and formwork (used and offcuts)	General Solid Waste (nonputrescible)	In-situ concrete yet to be determined, however a quantity of timber and formwork will be wasted. Waste generated will be minimised through construction management processes.	Either re-used on site or transferred off-site for reuse / reprocessing	Any element unable to be reused or recycled will require disposal at an appropriately licensed facility
Bricks / pavers / tiles General	Solid Waste (nonputrescible)	Quantities of bricks / pavers / tiles yet to be determined, however it is assumed that a proportion will be wasted, through breakage and	Transferred off-site for re-processing	Any element unable to be reused or recycled will require disposal at an appropriately licensed facility

Environmental Impact Statement
Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

Table 30: Waste generated during operations				
Waste Type	Classification	Estimated Quantity	Reuse/ Recycling	Disposal
		offcuts. Waste generated will be minimised through construction management processes.		
Sedimentation controls	General Solid Waste (nonputrescible)	Controls are likely to include hay bales and silt fences	Transferred off-site for re-processing	Any element unable to be reused or recycled will require disposal at an appropriately licensed facility
Packaging	General Solid Waste (nonputrescible)	Construction management processes will minimise the quantity of packaging waste produced	Packaging waste will be recycled wherever possible	Any element unable to be reused or recycled will require disposal at an appropriately licensed facility
General construction waste (non-putrescible)	General Solid Waste (nonputrescible)	Construction management processes will minimise the quantity of general construction waste produced	Transferred off-site for re-processing and recycling, wherever possible	Any element unable to be reused or recycled will require disposal at an appropriately licensed facility
Putrescible office and lunchroom waste	General Solid Waste (putrescible)	The project is expected to create 300 construction jobs, however the amount of waste produced by on-site workers will be dependent on phase of construction, how many workers are on site and facilities provided for workers.	N/A	Any element unable to be reused or recycled will require disposal at an appropriately licensed facility
Non-putrescible office and lunchroom waste	General Solid Waste (nonputrescible)	The project is expected to create 300 construction jobs, however the amount of waste produced by on-site workers will be dependent on phase of construction, how many workers are on site and facilities provided for workers.	All paper / cardboard and commingled recyclables will be transferred off-site for recycling	Any element unable to be reused or recycled will require disposal at an appropriately licensed facility

Environmental Impact Statement
Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

The types and quantities of waste to be generated during operation are summarised in **Table 31** which also outlines the methods for the processing and disposal of this waste.

Table 31: Waste generated during operations				
Waste Type	Classification	Estimated Quantity	Reuse/Recycling	Disposal
Residual Waste (office and lunchroom)	General Solid Waste (putrescible)	10,500 L / week		Disposal at an appropriately licensed facility
Recyclables	General Solid Waste (nonputrescible)	10,500 L / week	Off-site materials recovery and reprocessing	N/A
Maintenance/workshop consumables	Likely mostly General Solid Waste (nonputrescible)	Dependent upon site operational plans	Reuse and recycling of all materials, where feasible	Any element unable to be reused or recycled will require disposal at an appropriately licensed facility
Spill kit consumables	Likely mostly General Solid Waste (nonputrescible), however classification of spill kit consumables will be dependent upon spill type	Generated as necessary	Sent off-site for treatment at an appropriately licensed facility, if necessary	Disposal at an appropriately licensed facility
De-stuffing from containers: – Flexible plastics – Cardboard – Pallets – Tiles (plastic and metal)	General Solid Waste (nonputrescible)	Dependent upon expected throughput	Reuse and recycling of all materials, where feasible	Any element unable to be reused or recycled will require disposal at an appropriately licensed facility

The Waste Management Assessment provides consideration of the impacts associated with on-site and off-site waste management which are to be managed in accordance with a Construction Environmental Management Plan and an Operational Environmental Management Plan. Potential impacts are outlined in **Table 32**. Mitigation measures to be incorporated in these Management Plans are summarised in **Table 33**.

Environmental Impact Statement
Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

Table 32: Potential Waste Impacts

On-site Waste Management	Off-site Waste Management
Construction	
<i>Treatment and/or Reprocessing</i> - Vegetation will be either re-processed on-site or transferred off-site for reprocessing. Should this occur on-site, it will have an impact on noise sensitive receivers. - Concrete and asphalt will be reprocessed on-site or transferred off-site for reprocessing. Should this occur, it would potentially generate dust and have an impact on noise sensitive receivers.	<i>Recycling</i> - Noise associated with recycling activities (particularly with construction and demolition (C&D) waste) - Dust caused by recycling activities (particularly with C&D waste) - Odour associated with putrescible waste processing - Greenhouse gas emitted from recycling activities
<i>Storage</i> - VENM / ENM will be stored on-site for re-use or prior to removal from site. - Should concrete and asphalt be re-processed and re-used for on-site applications, it will be stockpiled on-site. Potential impacts associated with concrete stockpiling include health and safety hazards, dust and impact on visual amenity. - Timber, plasterboard, bricks / pavers / tiles, sediment controls, surplus building materials and other C&D wastes will be temporarily stockpiled on site prior to re-use, re-processing and / or offsite disposal. This could result in health and safety issues, dust and could impact visual amenity. - If waste is stored incorrectly, it may result in airborne litter and stormwater pollution.	<i>Disposal</i> - Greenhouse gas associated with disposal of putrescible waste - Dust - Consumption of landfill airspace - Disposal of potentially valuable natural resources - Health and safety risks associated with hazardous waste disposal
<i>Re-use</i> The Contractor may re-use some waste materials on-site. This is not expected to have an impact as it will essentially replace virgin materials.	
Operation	
<i>Treatment and / or Re-processing</i> N/A	<i>Recycling</i> - Noise and odour associated with recycling activities - Greenhouse gas emitted from recycling activities
<i>Storage</i> - Odour associated with storage of putrescible waste generated at the office - Vermin attracted by outside storage of putrescible waste - If waste is stored incorrectly, it may result in airborne litter and stormwater pollution	<i>Disposal</i> - Greenhouse gas associated with disposal of putrescible waste - Dust - Consumption of landfill airspace - Odour at putrescible waste landfill - Disposal of potentially valuable natural resources - Health and safety risks associated with hazardous waste disposal

Table 33: Waste Management Mitigation Measures

Phase	Mitigation Measure
Construction	▪ <i>Characterisation of construction waste streams</i> ▪ <i>Management of any identified hazardous waste streams</i> ▪ <i>Procedures to manage construction waste streams, including handling, storage, classification, quantification, identification and tracking</i> ▪ <i>Mitigation measures for avoidance and minimisation of waste materials</i> ▪ <i>Procedures and targets for reuse and recycling of waste materials.</i> ▪ <i>Best-practice waste management principles would be incorporated into the CEMP, such as:</i> – <i>All waste and recyclable streams shall be stored separately on site</i> – <i>All storage areas / containers for each waste and recycling stream shall be kept on the site at all times and shall be indicated on the site plans/drawings as part of the CEMP</i> – <i>Convenient and safe vehicular access to waste and recycling material storage areas shall be provided</i> – <i>The removal, handling and disposal of asbestos or other hazardous materials shall be carried out in accordance with WorkCover NSW, Office of Environment and Heritage and other regulatory authority guidelines and requirements</i> – <i>Appropriate signage will be used in the waste storage area to ensure correct separation of recyclables</i> – <i>Stockpiles will be maintained in accordance with the erosion and sedimentation control plan</i> – <i>Waste to be stored so as to avoid airborne litter, vermin and stormwater pollution</i> – <i>Re-processing, recycling and/or removal of waste materials for disposal should be scheduled to limit stockpiling and associated impacts.</i> – <i>Putrescible materials need to be removed from site as soon as possible to avoid odour impacts.</i> – <i>Non-putrescible materials should be reprocessed or removed from site on an 'as-needs' basis to limit logistical, health and safety and dust impacts. Hazardous waste materials, should they arise, must be immediately removed to limit environmental and health and safety risks.</i> – <i>Waste materials should only be transported to their next destination using a licensed contractor</i> – <i>Waste materials should only be transported to an appropriately licensed facility for recycling or disposal</i> – <i>Records to be maintained on all waste exiting the construction site.</i> ▪ <i>Waste avoidance principles that could be incorporated into the CEMP include:</i> – <i>Avoidance and reuse of material would have priority over recycling</i> – <i>Recycling would have priority over disposal</i> – <i>If possible concrete components would be crushed and re-used onsite, with the remainder sent to a recycling facility</i> – <i>Waste generation would be minimised by ordering the correct quantity of materials</i> – <i>Selection of materials which maximise recycled content, while having low embodied water and energy use</i> – <i>Selection of materials which maximise durability and lifespan.</i> – <i>Selection of reputable waste removal contractors who will guarantee that recyclable material will be recycled and will provide any relevant certificates</i> – <i>Vegetation removed shall be either preserved for use in the new development, or mulched for inclusion in landscaping activities. The remainder will be sent to a composting facility.</i> – <i>Excavated earth will be used for infill and landscaping where feasible, the</i>

Environmental Impact Statement
Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

Table 33: Waste Management Mitigation Measures

Phase	Mitigation Measure
	<i>remainder will be sent to a recycling facility</i> – <i>Asphalt will be re-used by transferring it to a batching plant or using it as a base layer for access roads</i> – <i>Coordinate and sequence trades people to minimise waste</i> – <i>Pre-fabricate materials where possible</i> – <i>Use modular construction to reduce the need for excess waste</i> – <i>Reuse formwork</i> – <i>Separate off-cuts to facilitate reuse, re-sale or efficient recycling</i> – <i>Select landscaping which reduces green waste</i> – <i>Engage with the supply chain to supply products and materials that use minimal packaging</i> – <i>Set up schemes with suppliers to take back packaging materials.</i>
Operation	▪ <i>Addressing waste management requirements and goals in staff inductions</i> ▪ <i>Providing staff access to documentation outlining the facility's waste management requirements</i> ▪ <i>Locating recycling bins in kitchen areas beside general waste bins to prevent contamination of recycling</i> ▪ <i>Positioning paper recycling bins close to printer/photocopying equipment</i> ▪ <i>Minimising general waste bins at desks but providing adequate container and paper recycling to encourage sorting of recyclables</i> ▪ <i>Providing adequate bin storage for the expected quantity of waste.</i> ▪ <i>Appropriate areas shall be provided for the storage of waste and recyclable material</i> ▪ <i>Standard signage on how to use the waste management system and what materials are acceptable in the recycling will be posted in all waste collection and storage areas</i> ▪ <i>All waste shall be collected regularly and disposed of at licensed facilities</i> ▪ <i>An education programme and on-going monitoring will to be implemented for training personnel to properly sort and transport waste into the right components and destinations.</i>

6.10 CONTRIBUTIONS

Campbelltown City Council has adopted a Section 94A Development Contributions Plan which applies a percentage-based levy to most Development Applications relating to the majority of land within the Campbelltown LGA.

For developments over \$200,000 a 1% levy is applicable.

It is anticipated that the payment of a Section 94A levy prior to the issue of a Construction Certificate for the proposed works will be required as a Condition of Development Consent.

6.11 MINERAL RESOURCES

Details of mineral resources are provided within the Geotechnical Investigation at **Appendix 11**.

The Geotechnical Investigation describes the site's ground conditions as comprising Quaternary paleochannel deposits, including fluvial sand, clay and silt, underlain by Ashfield Shale and Hawkesbury Sandstone. The site is not known to contain any acid sulphate soils. Boreholes at eight locations on the site revealed:

- Topsoil only on the edges of the site and consisting of clays and silts.
- Asphalt or concrete hardstand surface over the majority of the site;
- Fill comprising of medium plasticity silty clay;
- Clay and sandy clay with some angular gravel; and
- Two soil stockpiles and alluvium material comprising high plasticity grey and brown clay.

In response to its findings, the report provides recommendations and mitigation measures to be implemented during bulk earthworks and construction phases of the development.

Based on the above, the proposal will not impact on any mineral resources.

6.12 HERITAGE

Aboriginal Heritage Assessments for both Aboriginal and Non-Aboriginal Heritage have been prepared by Artefact heritage and are provided at **Appendices 16 and 17**, respectively.

6.12.1 Aboriginal Heritage

The Aboriginal Heritage Assessment confirms that the site does not contain any registered Aboriginal sites and has not identified any new Aboriginal objects or sites. The Aboriginal Heritage Information System does however identify seven (7) Aboriginal sites within the general vicinity of the site including two (2) artefacts, one (1) pigment or engraved artefact, three (3) pigment or engraved art features and one (1) potential archaeological deposit. **Figure 14** shows the spatial distribution of these sites.

The closest Aboriginal site is located 90m from the eastern site boundary and is identified as 'Pembroke Road IF1' consisting of an isolated find being a silcrete flake within a vehicle track. The Aboriginal Heritage Assessment identifies that this isolated find is likely to be a redeposited artefact and is not indicative of further archaeological potential.

The site is assumed to be heavily disturbed based on the nature of adjacent sites and land modification. The site boundary has been heavily impacted by earthworks relating to the

development of the canals which significantly reduces the archaeological potential of this portion of the site.

Preliminary geotechnical surveys revealed alluvial deposits at a depth of 1.6-4.4m below surface level indicative of significant filling owing to this variation in depth. The level of disturbance of this alluvial layer is unclear. The works proposed subject to this application will not impact on buried alluvium and will involve filling above the existing ground level.

The report recommends that no Aboriginal heritage constraints are place on the proposed development and that works can proceed with caution. If unforeseen Aboriginal objects are uncovered during construction the unexpected find protocol should be followed. Work should cease in the area, and an archaeologist, Office of Environment and Heritage (OEH), and Tharawal Local Aboriginal Land Council (TLALC) should be informed. If human remains are found, work should cease, the site should be secured and the NSW Police should be notified. If the remains are found to be archaeological an archaeologist, OEH, and TLALC should be informed. Further investigation and approvals may be required in such instances.

6.12.2 Non-Aboriginal Heritage

The Non-Aboriginal Heritage Assessment confirms that the site does not include any statutory heritage items, historic sites or features. The site is however identified in proximity of two (2) statutory items being the Hollylea and former Plough Inn 450m south-west of the site and Milestone XXXI 300m west of the site. Within these sites the Register of the National Trust lists four (4) heritage items. The report concludes though that the proposed development will have no direct or indirect impact on these heritage items including in relation to views and vistas. **Figure 15** demonstrates the location of these heritage items in the context of the site.



Figure 15: Heritage Items

The report identifies that there is low potential for features such as cesspits, wells or concentrated relics to be found on the site owing to the historical use of the site for farmland with no record of permanent or temporary structures having been built prior to the existing industrial facility.

Further, the majority of the boundary of the site has been heavily impacted by earthworks relating to the development of the canals, while the interior of the site has been completely covered by bitumen. Given the bitumen, survey was unable to determine whether this original landscape had been heavily disturbed in the development of the facility, however it is considered likely that levelling of the landscape before construction would have caused heavy

impacts. These factors significantly reduce the archaeological potential within the site. Therefore, it is assessed that the study area has nil to low historical archaeological potential.

The report concludes that the proposed development will have no direct or indirect impact on the heritage fabric of any of the listed items and there is nil to low chance that the proposed works will impact any sub-surface relics. Based on the assessment undertaken the report provides the following recommendations:

- *No further archaeological or heritage assessment is required in relation to the proposed development within the precincts identified for the development at 5 and 9 Culverston Road, Minto.*
- *A heritage induction should be provided for all workers prior to works commencing. If unexpected archaeological finds are discovered during the proposed works, a heritage consultant should be engaged to assess the find and the NSW Heritage Division would be notified of the discovery of a relic in accordance with Section 146 of the NSW Heritage Act 1977.*

These recommendations will be adopted in the relevant phases of the development.

PART G MANAGEMENT AND MITIGATION MEASURES

by Minto Properties Pty Ltd (Minto Properties)
in relation to Proposed Warehouse and Logistics Hub
at 5 and 9 Culverston Road, Minto (Lot 3 in DP 817793 and Lot 400 in DP 875711).

Minto Properties will undertake the construction and operation of the proposed facility in accordance with the following:

The following defines some of the terms and abbreviations used in this statement:

Approval	The Minister's approval of the Project
BCA	Building Code of Australia
Council	Campbelltown City Council (CCC)
Department	Department of Planning and Environment
Secretary-General	Secretary-General of the Department (or delegate)
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
Project	The development as described in the EIS
Site	Land to which the project application applies
WorkCover	NSW WorkCover

SPECIFIC ENVIRONMENTAL MANAGEMENT & MITIGATION MEASURES

Noise

1. Operation

Prior to commencement of operation, Minto Properties will implement a noise management plan that will be consistent with the NSW Environment Protection Authority's "Industrial Noise Policy" and will include:

- a) Development of a notification and negotiation procedure for receivers where noise impact cannot be mitigated to meet the criteria.
- b) A procedure for dealing with and responding to complaints

Air

Dust Management

2. Prior to commencement of works, a construction air quality management plan will be developed (post approval) considering the following measures to minimise the potential for dust generation:
 - letter box drop to noise sensitive receivers to inform them of potential work that could result in dust;
 - minimising the area of disturbance as far as practicable during works;
 - promptly stabilising/revegetating disturbance areas;
 - air quality complaints handling procedure;
 - monitoring of dust emissions during construction to confirm compliance;
 - minimising drop heights for materials being worked on the site;
 - keeping exposed surfaces moist;
 - limit vehicle speeds on the construction site to less than 30 km/h; and
 - ensuring trucks are covered and do not track sediment onto public roads.

Waste Management

Construction

3. During construction, Mino Properties will implement the following measures to mitigate the effect of the construction waste. These are to be incorporated into the Construction Environmental Management Plan (CEMP) to be issued prior to commencement of construction), including the following:
 - *Characterisation of construction waste streams;*
 - *Management of any identified hazardous waste streams;*
 - *Procedures to manage construction waste streams, including handling, storage, classification, quantification, identification and tracking;*
 - *Mitigation measures for avoidance and minimisation of waste materials;*
 - *Procedures and targets for reuse and recycling of waste materials. Best-practice waste management principles would be incorporated into the CEMP, such as:*
 - *All waste and recyclable streams shall be stored separately on site;*
 - *All storage areas / containers for each waste and recycling stream shall be kept on the site at all times and shall be indicated on the site plans/drawings as part of the CEMP;*
 - *Convenient and safe vehicular access to waste and recycling material storage areas shall be provided;*
 - *The removal, handling and disposal of asbestos or other hazardous materials shall be carried out in accordance with WorkCover NSW, Office of Environment and Heritage and other regulatory authority guidelines and requirements;*
 - *Appropriate signage will be used in the waste storage area to ensure correct separation of recyclables;*
 - *Stockpiles will be maintained in accordance with the erosion and sedimentation control plan;*
 - *Waste to be stored so as to avoid airborne litter, vermin and stormwater pollution;*
 - *Re-processing, recycling and/or removal of waste materials for disposal should be scheduled to limit stockpiling and associated impacts;*
 - *Putrescible materials need to be removed from site as soon as possible to avoid odour impacts. Non-putrescible materials should be reprocessed or removed from site on an 'as-needs' basis to limit logistical, health and safety and dust impacts. Hazardous waste materials, should they arise, must be immediately removed to limit environmental and health and safety risks;*
 - *Waste materials should only be transported to their next destination using a licensed contractor;*
 - *Waste materials should only be transported to an appropriately licensed facility for recycling or disposal;*
 - *Records to be maintained on all waste exiting the construction site;*
 - *Waste avoidance principles that could be incorporated into the CEMP include:*
 - *Avoidance and reuse of material would have priority over recycling;*
 - *Recycling would have priority over disposal;*
 - *If possible concrete components would be crushed and re-used on-site, with the remainder sent to a recycling facility;*
 - *Waste generation would be minimised by ordering the correct quantity of materials;*
 - *Selection of materials which maximise recycled content, while having low embodied water and energy use;*
 - *Selection of materials which maximise durability and lifespan;*
 - *Selection of reputable waste removal contractors who will guarantee that recyclable material will be recycled and will provide any relevant certificates;*
 - *Vegetation removed shall be either preserved for use in the new development, or mulched for inclusion in landscaping activities. The remainder will be sent to a composting facility;*

Environmental Impact Statement

Proposed Warehouse and Logistics Hub
5 and 9 Culverston Road, Minto

- *Excavated earth will be used for infill and landscaping where feasible, the remainder will be sent to a recycling facility;*
- *Asphalt will be re-used by transferring it to a batching plant or using it as a base layer for access roads;*
- *Coordinate and sequence trades people to minimise waste;*
- *Pre-fabricate materials where possible;*
- *Use modular construction to reduce the need for excess waste, where possible or feasible;*
- *Separate off-cuts to facilitate reuse, re-sale or efficient recycling Select landscaping which reduces green waste;*
- *Engage with the supply chain to supply products and materials that use minimal packaging Set up schemes with suppliers to take back packaging materials.*

The following measures are to be implemented during the operational phase:

Operation

- *Addressing waste management requirements and goals in staff inductions;*
- *Providing staff access to documentation outlining the facility's waste management requirements;*
- *Locating recycling bins in kitchen areas beside general waste bins to prevent contamination of recycling;*
- *Positioning paper recycling bins close to printer/photocopying equipment;*
- *Minimising general waste bins at desks but providing adequate container and paper recycling to encourage sorting of recyclables;*
- *Providing adequate bin storage for the expected quantity of waste;*
- *Appropriate areas shall be provided for the storage of waste and recyclable material;*
- *Standard signage on how to use the waste management system and what materials are acceptable in the recycling will be posted in all waste collection and storage areas*
- *All waste shall be collected regularly and disposed of at licensed facilities;*
- *An education programme and on-going monitoring will to be implemented for training personnel to properly sort and transport waste into the right components and destinations.*

Aboriginal Heritage

4. If unforeseen Aboriginal objects are uncovered during construction the unexpected finds protocol will be followed. Work will cease in the area, and an archaeologist, OEH, and TLALC will be informed. If human remains are found, work will cease, the site will be secured and the NSW Police notified.

Non-Aboriginal Heritage

5. A heritage induction will be provided for all workers prior to works commencing. If unexpected archaeological finds are discovered during the proposed works, a heritage consultant will be engaged to assess the find and the NSW Heritage Division would be notified of the discovery of a relic in accordance with Section 146 of the NSW Heritage Act 1977.

Ecologically Sustainable Development

6. Prior to the issue of a Construction Certificate for the warehouse facilities, Minto Properties will prepare an Ecologically Sustainable Development Strategy that addresses the following measures:
 - *Improved daylight to warehouse by incorporating translucent sheeting*
 - *Lighting technologies and controls*
 - *High energy efficient air conditioning systems*
 - *Investigation of natural and mixed mode ventilation where possible*

Environmental Impact Statement

Proposed Warehouse and Logistics Hub

5 and 9 Culverston Road, Minto

- *High efficiency glazing and shading for the offices*
- *Solar hot water system*

Outdoor Lighting

7. During detailed design, Minto Properties will ensure that the lighting is designed to the relevant Australian Standard and design to minimize light spill onto neighboring properties. The installation contractor will ensure lighting is installed as per the approved lighting design. Additionally, as part of the commissioning phase of the project, the lighting installation will be checked to ensure the installed luminaires are of the correct type, in the correct locations, and aimed in accordance with the lighting design.

Flooding

8. A Local Flood Plan is to be prepared for the development that includes measures to be implemented during a PMF event including:
 - on-site refuge facilities, within buildings that are to be structurally stable during a PMF event.
 - development of a means to inform all users of the site on how to respond and reach the refuge facilities in major flood events;
 - collaboration with CCC and State Emergency Services in developing the Local Flood Plan. In particular, addressing evacuation and clean up procedures.

Geotechnical

9. Additional investigation are to be undertaken during detailed design and prior to commencement of construction works to determine:
 - The varying thicknesses of fill across the site and potential ground improvement options;
 - The location of any former watercourse, which may contain deeper alluvial soils, gravels or compressible cohesive material; and
 - Engineering behaviours of the soils across the site to support the proposed structures, pavements and for material reuse.

Contamination

10. Prior to the commencement of construction works and detailed design, additional intrusive investigations are to be completed in the central portion of the site to determine if any remediation or management action may be required. Any remediation works will be in accordance with the Remediation Action Plan that is required.

Traffic – Construction

11. Prior to the commencement of construction, a Construction Traffic Management Plan will be prepared that includes the following measures:
 - Manage and regulate traffic movements into and out of the site during construction;
 - Schedule intensive delivery activities outside of peak hours; and
 - Construction and delivery vehicles being limited to use of Campbelltown Road, Narellan Road, Blaxland Road or the M31 Motorway and restricted to non-peak periods.

PART H PROJECT JUSTIFICATION

The proposal is considered to be justified in the context of environmental, social and economic terms and is compatible with the locality in which it is proposed.

This application is lodged on the basis of:

Supporting State, Regional and Local planning objectives

The proposal is consistent with the objectives, provisions and strategies outlined within the *NSW 2021: A Plan to Make NSW Number One, A Plan For Sydney* and *Campbelltown Local Environmental Plan 2015*.

Specifically the proposed development will contribute to economic growth and prosperity in accordance with *NSW 2021*. The proposal will preserve the existing use of the site in order to support employment-generating activities with significant positive economic impacts for the local and regional economies. These benefits derive from the direct employment opportunities provided through the construction and operational phases of the development including approximately 300 construction jobs and 500-600 operation jobs. Additionally the proposed development will generate indirect employment for the local and regional populations. Other positive economic connotations of the proposed relate to sustaining the role of industry and the provision of high quality warehouse and logistics facilities to accommodate a range of industrial activities to support the operational requirements of end-users. Therefore through the creation of significant direct and indirect employment through all phases of the development and the provision of facilities to support industrial businesses the proposal provides significant economic benefit contributing to the attainment of *NSW 2021's* objectives for economic growth and prosperity.

The proposed development also supports the objectives and targets of A Plan for Growing Sydney by supporting economic growth, providing employment close to housing and established infrastructure, enhancing the productivity of Western Sydney and establishing the role of Campbelltown in supporting the regional economy.

Further to the above State and regional Planning policies, the proposal will positively contribute to the Campbelltown LGA given that it is highly commensurate with the *Campbelltown Local Environmental Plan 2015* (CLEP2015), *Campbelltown Development Control Plan* (CDCP2015) and the local context. The proposed Warehouse and Logistics Hub will preserve the use of the site for employment generating development which is consistent with the IN1 zoning of the land pursuant to the CLEP2015 and the established industrial character of the area.

For the reasons outlined above, the proposed development is considered to positively contribute to the attainment of State, regional and local planning objectives.

Appropriate use of an approved site

The proposal will retain and contribute to the growth of important industry for the region. The strengthening of this sector is important strategy for the economic welfare of Western Sydney as a region as well as NSW. The development complements significant government investment in infrastructure and results in employment generating development.

Environmental impacts have been minimised

Specialist consultants have assessed the risks and determined that the development can be undertaken with minimal environmental impacts. No significant risk to the locality is to result from the proposal. Where impacts have been identified, these have been appropriately managed and mitigated through the compilation of mitigation measures.

Compatibility with surrounding development

The proposed use is compatible with existing uses on the subject site and adjacent land. The investigations undertaken as part of this application conclude that no significant cumulative impact is to occur from the proposed use of the site for a Warehouse and Logistics Hub.

Ecologically Sustainable Development

The principles of ecologically sustainable development as outlined in Clause 7(4) of the EPA Regulations are addressed as follows:

- *Precautionary Principle*
No unmanageable threat or irreversible damage to the environment has been identified in relation to the proposal.
- *Inter-generational Equity*
No unreasonable use of resources, affectation of environmental processes or prevention of the use of land for future generations will occur from the proposal.
- *Conservation of Biological Diversity and Ecological Integrity*
The site has been previously disturbed. No processes, habitats or species outside the site are likely to be significantly affected by the development.
- *Improved Valuation, Pricing and Incentive Mechanisms*
The proposal seeks to implement measures to avoid, contain and address any associated waste or pollution through appropriate design and management.

The proposal will effectively enable improved cost efficiencies in the provision of Warehouse and Distribution.

PART I CONCLUSION

The proposed Warehouse and Logistics Hub is defined as State Significant Development pursuant to Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011*.

The site is owned by Minto Properties Pty Ltd and is located within an existing industrial precinct with strategic access to Sydney's key arterial road network. The proposal will retain the use of the site for employment-generating purposes by facilitating the operation of the site for the storage and distribution of freight. Accordingly the proposal will create employment opportunities and service businesses that operate on a local and national scale.

The provisions of the *Campbelltown Local Environmental Plan 2015* permit the proposed development. No adverse environmental impacts are anticipated to result from the construction or operational phases of the proposal given its context in an industrial area that has been identified for the intended activities. The proposal is also suitably separated from sensitive areas and is serviced by adequate infrastructure, including a capable road network. The inconsequential environmental impact of the proposed development will be ensured by the implementation of the management and mitigation measures outlined in Part G of this EIS formulated in response to the findings and recommendations of the specialist reports provided within Appendices 1-21.

The proposal is consistent with the objectives, provisions and strategies outlined within the *NSW 2021: A Plan to Make NSW Number One, A Plan For Sydney* and *Campbelltown Local Environmental Plan 2015*. Specifically the proposed development will contribute to economic growth and prosperity in accordance with these policies by allowing an existing business to develop and expand (within NSW) and creating employment opportunities in a site earmarked for such development.

Further, the proposal will preserve the industrial use of the site in order to support employment-generating activities with significant positive economic impacts for the local and regional economies. These benefits derive from the direct employment opportunities provided through the construction and operational phases of the development including approximately 300 construction jobs and 500-600 operation jobs. Additionally the proposed development will generate indirect employment for the local and regional populations. Other positive economic connotations of the proposed relate to sustaining the role of industry and the provision of high quality warehouse and logistics facilities to accommodate a range of industrial activities to support the operational requirements of end-users.

Based on the findings of this EIS, the proposal supports the continued development of jobs in Western Sydney and contributes to the retention and growth of warehouse and logistics. The proposal is suitable for the local context and is appropriate based on social, cultural, economic and environmental considerations.

As such, it is recommended that the proposal be supported by the Department of Planning and Environment.

Appendix 1
Secretary's Environmental Assessment Requirements

Appendix 3
Survey

Appendix 4
Architectural Drawings

Appendix 6
Landscape Plan

Appendix 7
Traffic Impact Assessment

Appendix 8
Noise & Vibration Impact Assessment

Appendix 9
Civil Design Plans

Appendix 10
Flood Report and Stormwater Concept Plan

Appendix 11
Geotechnical Report

Appendix 12
Air Quality Impact Assessment

Appendix 13
Infrastructure & Servicing Report

Appendix 14
Phase 1 Environmental Site Assessment

Appendix 15
Waste Management Report

Appendix 16
Aboriginal Heritage Impact Assessment

Appendix 17
Non-Aboriginal Heritage Impact Assessment

Appendix 18
Building Code of Australia Report

Appendix 20
Light Spill Assessment

