URBIS

ENVIRONMENTAL IMPACT STATEMENT

Aspect Industrial Estate | Concept Plan, Stage 1 (SSD-10448 Mod 10) & WH8 Fit-Out and Use Application (SSD-80331959)

Prepared for

MIRVAC

June 2025

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

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Associate Director	Nik Wheeler
Senior Consultant	Andrew Lee
Project Code	P0058474
Report Number	FINAL

Acknowledgement of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on.

We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years.

We pay our respects to First Nations Elders, past and present.

The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

Title: Sacred River Dreaming
Artist Hayley Pigram
Darug Nation
Sydney, NSW

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FIGURES

TABLES

SIGNED DECLARATION

Project details		
Project name	Aspect Industrial Estate	
Application number	SSD-80331959 & SSD-10448	
Address of the land in respect of which the development application is made	WH8 Site: 4 Pemul Place, Kemps Creek (Lot 105 DP1305965) AIE: 788-882 Mamre Road, Kemps Creek (Lot 301 DP1305254, Lot 105 DP1305965, Lot 305, DP1305254 and Lot 104, DP1305965) EEP: 1669A Elizabeth Drive, Badgerys Creek and 1669-1723 Elizabeth Drive, Badgerys Creek (Lot 100 DP1283398 & Lot 741 DP810111)	
Applicant details		
Applicant name	Mirvac Industrial Developments Pty Ltd (Susan Paul – Development Manager)	
Applicant address	Level 28, 200 George Street, Sydney, NSW 2000 Australia	
Details of people by whom this EIS was prepared		
Names and professional qualifications	**Jacqueline Parker** Director Urbis Ltd Bachelor of Planning (UNSW) Master of Urban Development and Design (UNSW)	**Andrew Lee** Senior Consultant Urbis Ltd Bachelor of Planning (UNSW)
Address	Level 8, Angel Place, 123 Pitt Street, Sydney NSW 2000	
Declaration		

The undersigned declares that this EIS:

- has been prepared in accordance with the *Environmental Planning and Assessment Regulation 2021*;
- contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates;
- does not contain information that is false or misleading;
- addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project;
- identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments;
- has been prepared having regard to the Department's *State Significant Development Guidelines - Preparing an Environmental Impact Statement*;

- contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development;
- contains a consolidated description of the project in a single chapter of the EIS;
- contains an accurate summary of the findings of any community engagement; and
- contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.
- Is in accordance with the *Registered Environmental Assessment Practitioner Guidelines.*

Signatures		
	 Jacqueline Parker, Director (RPIA Plus EIA no. 68278)	 Andrew Lee, Senior Consultant
Date	27.06.2025	27.06.2025

GLOSSARY AND ABBREVIATIONS

Reference	Description
ACHAR	Aboriginal Cultural Heritage Assessment Report
AIE	Aspect Industrial Estate
AEP	Annual Exceedance Probability
AHD	Australia Height Datum
ANEF	Australian Noise Exposure Forecast
AQIA	Air Quality Impact Assessment
ASS	Acid Sulphate Soils
BAM	Biodiversity Assessment Method
BC Act	Biodiversity Conservation Act 2016
BC Reg	Biodiversity Conservation Regulation 2017
BCA	Building Code of Australia
BDAR	Biodiversity Development Assessment Report
CDA	Concept Development Application
CEMP	Construction Environmental Management Plan
CMP	Construction Management Plan
CTMP	Construction Traffic Environmental Plan
CWC	Connecting with Country
DCP	Development Control Plan
DP	Deposited Plan
DPHI	New South Wales Department of Planning, Housing and Infrastructure
DSI	Detailed Site Investigation
EDC	Estimated Development Cost
EEP	Elizabeth Enterprise Precinct
EIS	Environmental Impact Statement
EP&A Act	Environmental Planning and Assessment Act 1979
EPA Regulation	Environmental Planning and Assessment Regulation 2021
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
EIS	Environmental Impact Statement

Reference	Description
EPA	New South Wales Environment Protection Authority
EPI	Environmental Planning Instrument
ESCP	Erosion and Sediment Control Plan
ESD	Ecologically Sustainable Development
GANSW	Government Architect New South Wales
GFA	Gross Floor Area
GTP	Green Travel Plan
LAeq	A frequency-weighted Equivalent Continuous Sound Level
LEP	Local Environmental Plan
LGA	Local Government Area
LSPS	Local Strategic Planning Statement
MUSIC	Model for Urban Stormwater Improvement Conceptualisation
NIA	Noise Impact Assessment
NML	Noise Management Level
NSW	New South Wales
OEMP	Operational Environmental Management Plan
R&H SEPP	State Environmental Planning Policy (Resilience and Hazards) 2021
PMF	Probable Maximum Flood
POM	Plan of Management
PSI	Preliminary Site Investigation
Planning Systems SEPP	State Environmental Planning Policy (Planning Systems) 2021
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SIA	Social Impact Assessment
SIDRA	Signalised & Unsignalised Intersection Design and Research Aid
Site	WH8 Site: 4 Pemul Place, Kemps Creek (Lot 105 DP1305965) AIE: 788-882 Mamre Road, Kemps Creek (Lot 301 DP1305254, Lot 105 DP1305965, Lot 305, DP1305254 and Lot 104, DP1305965) EEP: 1669A Elizabeth Drive, Badgerys Creek and 1669-1723 Elizabeth Drive, Badgerys Creek (Lot 100 DP1283398 & Lot 741 DP810111)
SSD	State Significant Development

Reference	Description
SSDA	State Significant Development Application
T&I SEPP	State Environmental Planning Policy (Transport and Infrastructure) 2021
TfNSW	Transport for New South Wales
TIA	Traffic Impact Assessment
VIA	Visual Impact Assessment
WSAP	Western Sydney Aerotropolis Plan
WSAPP	Western Sydney Aerotropolis Precinct Plan
WCM	Water Cycle Management
WMP	Waste Management Plan
WSUD	Water Sensitive Urban Design

EXECUTIVE SUMMARY

Overview

This Environmental Impact Statement (**EIS**) has been prepared on behalf of Mirvac Industrial Developments Pty Limited (**Mirvac**) in support of a concurrent Concept Approval modification application to SSD-10448 (**MOD 10**) and a State Significant Development Application (**SSDA**) for fit-out and use of the approved Warehouse 8 building for the purposes of 'printing' operations as a form of 'other manufacturing industries' (**SSD-80331959**).

The EIS is submitted to the NSW Department of Planning, Housing and Infrastructure (**DPHI**) in support of the concurrent modification application and SSDA for the site at 4 Pemul Place, Kemps Creek (the **site**), which forms part of the Aspect Industrial Estate (**AIE**). It is noted the Concept Approval also applies to 1669A and 1669- 1723 Elizabeth Drive, Kemps Creek, referred to as the Elizabeth Enterprise Precinct (**EEP**).

The site is located on Deerubbin Country and we acknowledge the Darug and Darkinjung people, their elders past and present and their deep and continuing connection to their land. In preparing this EIS we acknowledge the importance of a Country-centred approach to the design, guided by Aboriginal people, who know that if we care for Country, Country will care for us.

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

Detailed development consent (SSD-60513208) was granted on 11th October 2024 for the construction of a warehouse & distribution facility on Warehouse 8 / Lot 8 within AIE.

The proposed modification and SSDA seeks to facilitate tenant operations at Warehouse 8, constituting IVE Group packaging and print operations.

- **SSD-10448 MOD 10**: Modify the Estate wide concept plan, including site layout, parking and landscaping. This includes an updated quantum of parking at Warehouse / Lot 8 to a total of 360 parking spaces to meet the proposed operational requirements. The warehouse specific acoustic condition in A16(a) is also proposed to be modified to enable cumulative sound power level of 98dBA from warehouse 8.
- **SSD-80331959**: Approval for 'printing' operations as a form of 'other manufacturing industries' land use at Warehouse / Lot 8. Approval for fit-out works to facilitate the IVE Group printing operations.

The modified concept plan and the proposed land use fitout at Warehouse / Lot 8 are detailed in the Architectural Plans prepared by SBA Architects at **Appendix F**. The site plan is provided at **Figure 1** overleaf.

In accordance with Schedule 1 of the *State Environmental Planning Policy (Planning Systems) 2021* (**Planning Systems SEPP**), development that has an Estimated Development Cost (**EDC**) of more than $50 million for the purpose of warehouses or distribution centres are classified as SSD. SSD-10448 MOD 10 will remain consistent with this and is appropriately characterised as SSD. The proposed modification is considered as 'substantially the same development' as the development for which consent was originally granted' so would meet the requirements of S4.55(2) of the EP&A Act.

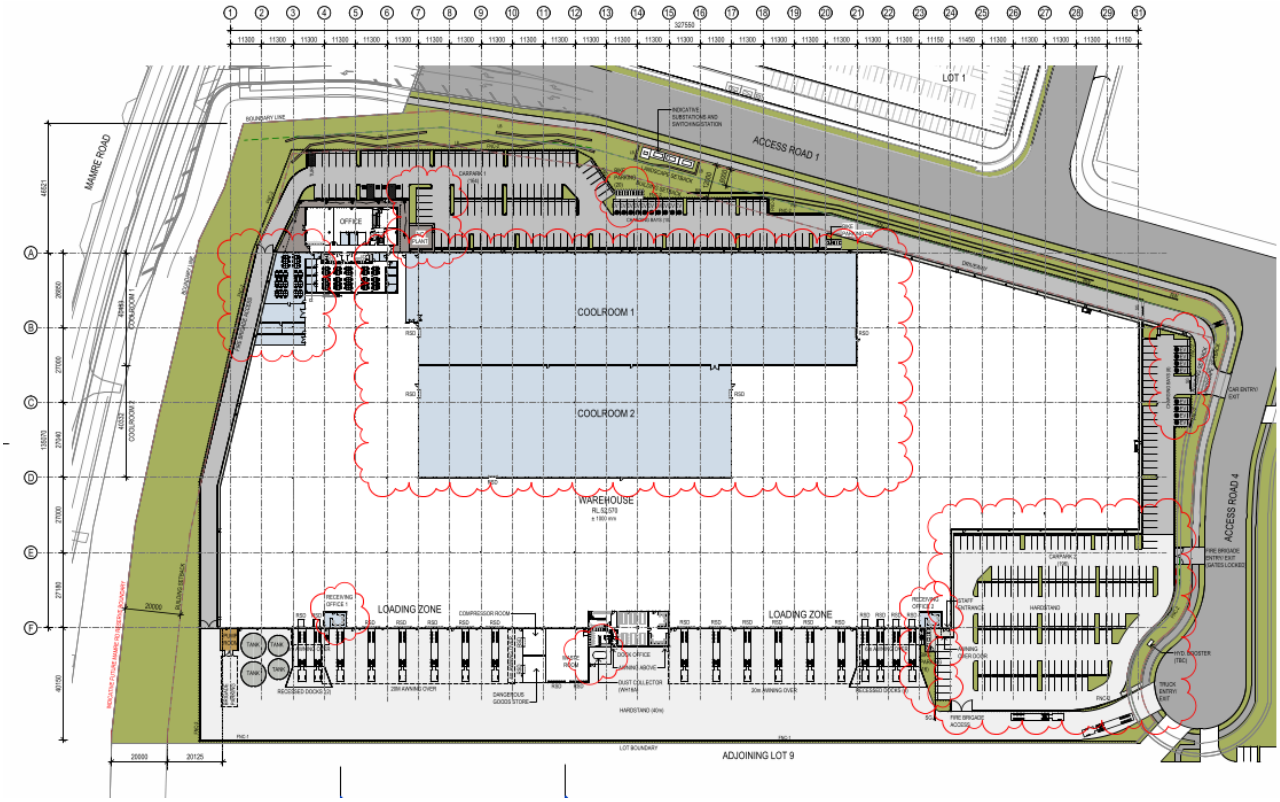
As SSD-80331959 is for the purposes of a 'Other manufacturing industries' with a capital investment value of in excess of $30 million, it is classified as a State Significant Development (**SSD**) under Clause 11, Schedule 1 of the Planning Systems SEPP.

This EIS has been prepared in response to Secretary's Environmental Assessment Requirements (**SEARs**) for SSD-80331959, issued on 21st March 2025. This report includes assessment of compliance with the statutory and strategic planning framework, and all other potential environmental impacts identified through the preparation of this SSDA.

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

Employment Area, which was rezoned in June 2020 for the intended use of warehousing and industrial development.

Figure 1 Proposed Site Plan



Source: SBA Architects

The Project Story

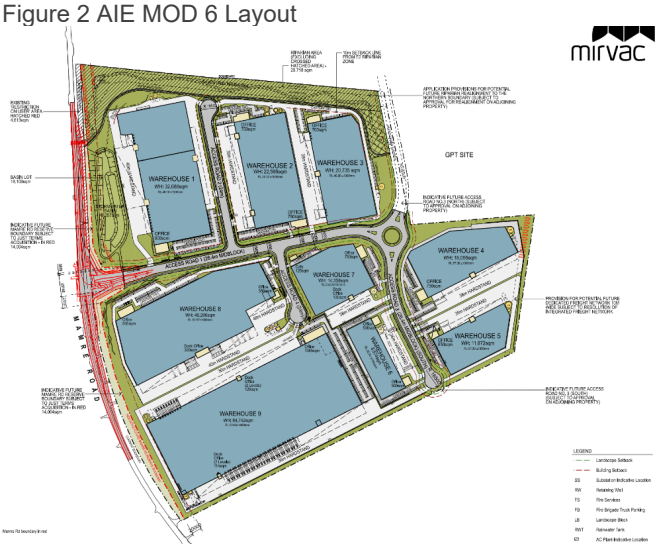
The AIE is currently in the process of being created in accordance with the Concept Proposal and Stage 1 Development SSD-10448 which was approved by the Minister for Planning under delegation on 24th May 2022. This included a Masterplan and Subdivision Plan, which set out the approved lot layout and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

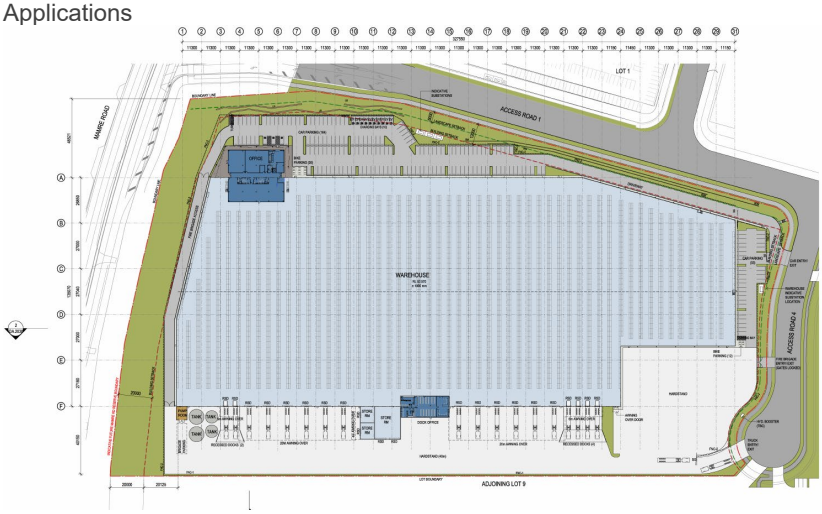
The consent granted approval for:

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

The SSD-10448 approval is currently subject to various modification applications and staged SSDAs. The key elements of the project history are described in **Table 1** below

Table 1 Key Project History

DA Number	Description of Development
SSD-10448 MOD 4	Modification Application 4 (**MOD 4**) implemented an Estate wide 'concept' approach to waterway health. This informs the stormwater management measures to be included in future built form DAs across Aspect Industrial Estate (including Warehouse 8). MOD 4 incorporates Mirvac owned land at EEP within the SSD 10448 Approval. The updated water management approach relies on the inclusion of existing undeveloped, pervious land in the EEP to meet compliance targets (as an interim solution) to allow development on the AIE site to proceed prior to a regional waterway strategy being adopted. MOD 4 also modified the WSUD Strategy across AIE to support the proposed and future built form development across the AIE. MOD 4 was approved by DPHI on 8th January 2024.
SSD-10448 MOD 6	The sixth modification (**MOD 6**) modified the Concept Proposal to reconfigure the estate with relation to the building form on Lot 8. This includes modification to the Warehouse 8 building footprint. This modification also to adjust the layout of hardstand across Lot 8, the provision of at grade car parking spaces as well as the vehicular access driveways. See Figure 2 below. MOD 6 was approved by DPHI on 14th October 2024. Figure 2 AIE MOD 6 Layout 
SSD-60513208 (Warehouse 8)	An SSD application for the development of Warehouse 8 on AIE Lot 2 in accordance with the masterplan layout sought to be established by MOD 6. This includes construction of a single warehouse and distribution building to a height of 13.7m. This application is identified as the "Stage 4" development. The development includes: ▪ Warehouse 8 – 40,200m^2 ground floor warehouse area, 850m^2 of office space and a 300m^2 dock office. ▪ 180 car parking spaces. SSD-60513208 was approved by DPHI on 11th October 2024.
Warehouse 8 Base Build Modifications SSD-10448 MOD 9 SSD-60513208 MOD 2	As detailed above, the development of Warehouse 8 building as a warehouse and distribution facility was approved under the latest approval for the AIE Concept Masterplan SSD-10448 MOD 6 and the Stage 4, detailed SSDA (SSD-60513208). To facilitate the IVE Group, printing tenant operations at Warehouse 8, updates to the approved development are required and are being progressed through multiple development applications. The updates have been separated and progressed into two "series" of applications, the first series of applications proposing and assessing the

DA Number	Description of Development
	updates to the base building layout, while the second series of applications (the subject of this EIS) proposes and assesses the new land use and operations. The Warehouse 8 Base Build Modifications are as follows: ▪ **Update the Concept Approval (SSD-10448 MOD 9) – Base Build**: to reflect the updated Lot / Warehouse 8 building layout, which will ultimately be required to support the IVE tenant operations ▪ **Update the Stage 4 Detailed SSDA (SSD-60513208 MOD 2) – Base Build**: to reflect the updated Lot / Warehouse 8 building layout, which will ultimately be required to support the IVE tenant operations. The Warehouse 8 Base Build Modifications have been submitted to DPHI and include the following modifications: ▪ Modifications to the Warehouse 8 building layout, including the addition of a storeroom office and modifications to the office location and layout. The proposal will modify the approved Warehouse 8 GFA as follows: – Warehouse GFA: 39,800m^2 (-400m^2) – Main Office GFA: 2,000m^2 (+1,150^2) – Dock Office GFA: 370m^2 (+70m^2) – Storeroom GFA: 460m^2 (+460m^2) ▪ Modifications to on-lot car parking numbers and location. The development as proposed to be modified will include 197 on-lot car parking spaces at Warehouse / Lot 8 (addition of 16 spaces) ▪ Modification to the Warehouse 8 loading area, docks and awning layout. ▪ Modification to the car park and loading dock ingress/egress to Access Road 4. ▪ Modifications to the on-lot landscaping and tree canopy coverage. ▪ Modifications to location of fire-fighting infrastructure. Figure 3 Updated Lot / Warehouse 8 Site Plan Proposed under the Base Build Applications  *Source: SBA Architects* At the time of writing, the Warehouse 8 Base Build Modifications have been formally lodged to DPHI and are under assessment. This EIS, has been designed and prepared assuming the approval of the updated Lot / Warehouse 8 layout seen in **Figure 3** above.

Community and Stakeholder Engagement

Community and stakeholder engagement has been undertaken by Urbis and the Project Team during the preparation of this report. This includes consultation with the surrounding community (surrounding local landowners, businesses, residents and stakeholders) and aboriginal stakeholders, feedback from the relevant government authorities as well as direct engagement and consultation with DPHI. The outcomes of the stakeholder engagement have been incorporated into the environmental impact assessment prepared in support of this modification application and are discussed in detail at **Section 5** of this report.

It is recommended that any further community and stakeholder consultation can be undertaken during the exhibition period for the application and any outcomes can be responded upon accordingly.

Strategic Justification

The EIS has assessed the project against the requirements of the Secretary's Environmental Assessment Requirements (SEARs) (**Appendix A**), and the relevant planning instruments and policies (**Section 4 and Appendix C**).

The key issues identified within the SEARs have been assessed in **Section 6** of the EIS. This assessment has been informed by specialist reports which include recommendations and mitigation measures. The assessment of key issues includes the mitigation measures which can be adopted to ensure the project does not result in any significant impacts. These mitigation measures are included at **Appendix E.**

The project is a positive development outcome for the site and surrounding area for the reasons outlined in **Table 2**.

Table 2 Summary of Development Outcomes

Matter	Response
The project is consistent with strategic planning policies	The proposal will support the future operation of the approved Warehouse 8 / Lot 8 development within the AIE as to meet the demands of a future tenant and thus, delivers usable industrial facilities in Western Sydney. The Mamre Road Precinct was rezoned specifically to facilitate land release for industrial purposes and therefore the proposal is highly consistent with the strategic intent for this part of the WSEA, as identified in the *Western City District Plan*, the *Greater Sydney Region Plan: The Metropolis of Three Cities* and the *Penrith Local Strategic Planning Statement*.
The project is consistent with State and local development controls	The development is permissible with consent and meets the relevant statutory requirements of the relevant environmental planning instruments, including; ▪ *State Environmental Planning Policy (Industry and Employment) 2021* ▪ *State Environmental Planning Policy (Planning Systems) 2021* ▪ *State Environmental Planning Policy (Resilience and Hazards) 2021* ▪ *State Environmental Planning Policy (Transport and Infrastructure) 2021* Consideration is given to the relevant matters for consideration as required under the *Biodiversity Conservation Act 2016*. A BDAR assessment was undertaken as part of the original SSD-10448 application and no works are proposed that would affect the outcomes of that assessment. The proposal will not result in any impacts to the relevant species and maintains compliance with the *Environment Protection and Biodiversity Conservation Act 1999* (**EPBC Act**). The proposal has been prepared to maintain compliance with the Mamre Road Precinct DCP 2021 (**MRP DCP**) provisions as they relate to providing safe and efficient access to Mamre Road.
The project minimises impacts on the natural environment	The proposal has been prepared to minimise impacts on the natural environment. The proposal will result in no discernible changes expected in traffic conditions in and around the site compared to the current approval and the operations will result in negligible adverse air quality impacts on nearby residential or industrial receptors. The proposal will result in negligible effect to the civil design being explored under the base build mod and the stormwater quantity, quality and flows will continue to meet the relevant targets. With regard to noise impacts, the proposed printing operations require specific external mechanical plant which will emit a greater noise emission. However, the project team has explored mitigation measures that could be

Matter	Response
	incorporated into the plant and subsequently, the cumulative noise levels generated across the estate, including those generated by the proposal, will continue to meet the noise limits across the surrounding sensitive receivers and thus, will result in an acceptable, amenity outcome for the surrounding area.
The project minimises impacts on the built environment	The revised building layout will not change the building height and overall warehouse design principles and materiality of the development as approved.
The project has positive social impacts	There is no significant adverse social impact resulting from the proposal when compared to the previously approved development at the site. Furthermore, a positive outcome of this proposal is anticipated with the increase in employment opportunities. This ensures that the community's well-being remains protected while supporting the continued development and operational efficiency of the Estate.
The project has positive economic impacts	The proposal will have positive economic impacts through enabling the delivery of industrial uses on site which will result in investment and economic benefit for Sydney as well as the wider region.
The site is suitable for the project	The 'printing' manufacturing use is permissible within the IN1 zone and is consistent with the zone objectives including to provide a wide range of industrial and manufacturing land uses; to encourage employment opportunities; and to minimise any adverse effect of industry on other land uses. The proposal is compliant with the State Environmental Planning Policy (Industry and Employment) 2021 and generally compliant with the MRP DCP including in relation to built form setbacks, car parking, and landscaping. The site is located within an industrial zoned location and the character and scale of the development is in keeping with the site's evolving and expected future context.
The project is in the public interest	The proposal is consistent with the planning and environmental policies applicable to the site and will deliver on the intended employment land function for the Mamre Road Precinct consistent with the strategic visions for the precinct, zoning of the site and is therefore considered to be in the public interest.

The EIS demonstrates that the project has significant merit and should be approved subject to the implementation of the mitigation measures described in this report and supporting documents.

1. INTRODUCTION

This Environmental Impact Statement (**EIS**) has been prepared on behalf of Mirvac Industrial Developments Pty Limited (**Mirvac**) in support of a concurrent Concept Approval modification application to SSD-10448 (**MOD 10**) and a State Significant Development Application (**SSDA**) fit-out and use of the approved Warehouse 8 building for the purposes of 'printing' operations as a form of 'other manufacturing industries' (**SSD-80331959**).

The EIS is submitted to the NSW Department of Planning, Housing and Infrastructure (**DPHI**) in support of the concurrent modification application and SSDA for the site at 4 Pemul Place, Kemps Creek (the **site**), which forms part of the Aspect Industrial Estate (**AIE**). It is noted the Concept Approval also applies to 1669A and 1669- 1723 Elizabeth Drive, Kemps Creek, referred to as the Elizabeth Enterprise Precinct (**EEP**).

The site is located on Deerubbin Country, and we acknowledge the Darug and Darkinjung people, their elders past and present and their deep and continuing connection to their land. In preparing this EIS we acknowledge the importance of a Country-centred approach to the design, guided by Aboriginal people, who know that if we care for Country, Country will care for us.

1.1. APPLICANT DETAILS

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

Table 3 Applicant Details

Descriptor	Proponent Details
Full Name(s)	Mirvac Industrial Developments Pty Limited
Postal Address	Level 28, 200 George Street Sydney, NSW 2000 Australia
ABN	47 127 755 239
Nominated Contact	Susan Paul – Development Manager

1.2. PROJECT BACKGROUND

1.2.1. Summary of Approved Development

On 24th May 2022, a State Significant Development Application (**SSDA**) was approved by the Minister for Planning under delegation in relation to Concept Proposal and Stage 1 Development SSD-10448. The consent granted approval for:

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

The SSD-10448 approval is currently subject to various modification applications and staged SSDAs. A Stage 4 SSD application has been approved for the development of Warehouse 8 on Lot 8 (SSD-60513208)

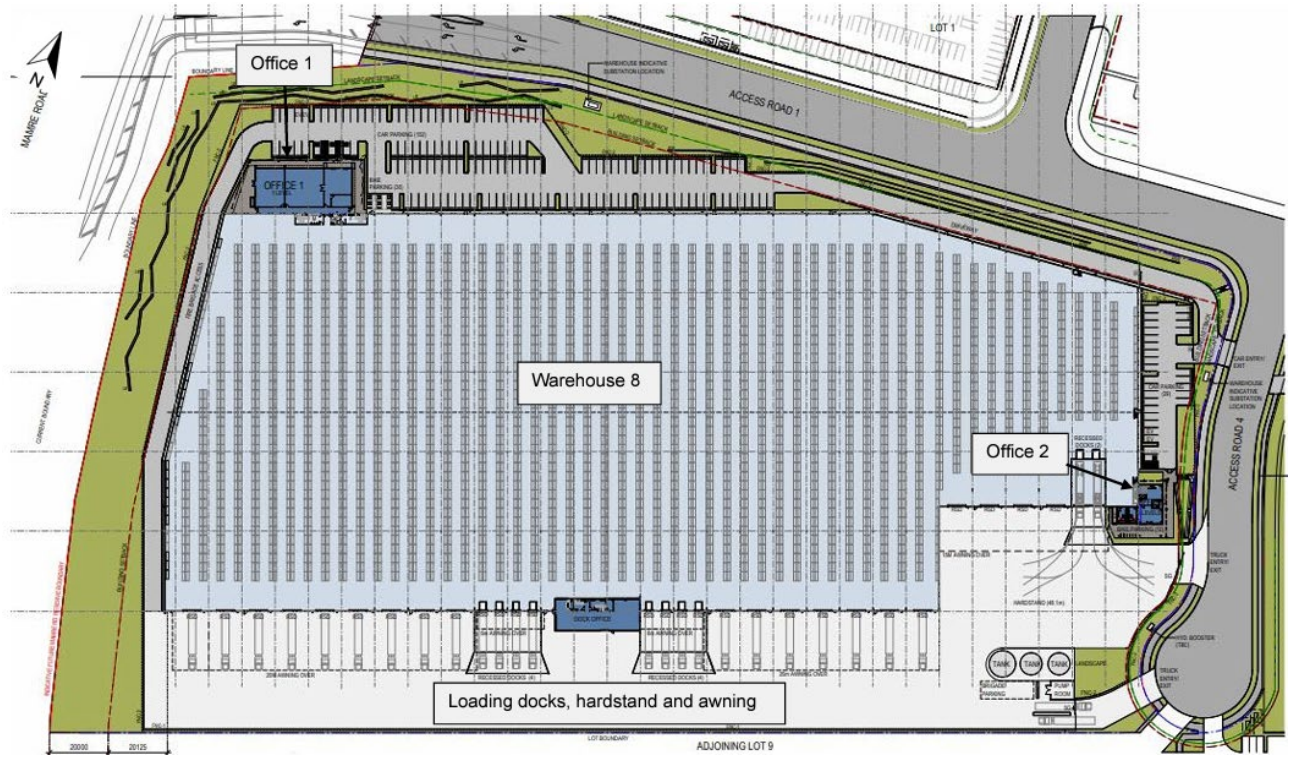
to be used for warehouse and distribution premises 24 hours a day 7 days a week, in line with the expectation of the Concept Approval for the wider estate. SSD-60513208 was lodged concurrently with a sixth modification to SSD-10448 (SSD-10448 MOD 6). SSD-60513208 and SSD-10448 MOD 6 were approved on 11th October 2024.

Specifically, SSD-60513208 approved the following:

- Construction and operation of a warehouse and distribution facility (Warehouse 8) with loading docks, hardstand and ancillary office space
- Minor on lot earthworks • installation of services and utilities
- Landscaping
- Construction of light and heavy vehicle access driveways and parking

While SSD-10448 MOD 6 is was chronologically lodged prior to SSD-10448 MOD 7, it was ultimately assessed and approved after the fact and thus, is the latest approved modification for SSD-10448.

Figure 4 Approved Warehouse / Lot 8 Site Plan



Source: SBA Architects

1.2.2. Project Terminology

The concept approval under SSD-10448 identifies the AIE as Lots 301 and 305 DP 1305254, Lots 104 and 105 DP 1305965 / 788-882 Mamre Road, Kemps Creek NSW 2178. At the time of writing, the address for the AIE has been updated to reflect its current legal description as well as the names applied to the internal estate roads. An overview of how the address has been updated is provided below:

Table 4 Updates to Site Addresses

Legal Description	301/-/DP1305254	105/-/DP1305965	104/-/DP1305965	305/-/DP1305254
AIE Address Under Concept Approval (SSD-10448) (Outdated)	788-824 Mamre Road Kemps Creek	826-882 Mamre Road Kemps Creek	826A Mamre Road Kemps Creek	Estate Roads

Legal Description	301/-/DP1305254	105/-/DP1305965	104/-/DP1305965	305/-/DP1305254
Current Addresses	2 Birragu Close, Kemps Creek 1-3 Darrabarra Avenue, Kemps Creek	98-102 Berriwerri Drive, Kemps Creek 4 Pemul Place, Kemps Creek 1, 2, 4 & 104 Berriwerri Drive, Kemps Creek	99-101 Berriwerri Drive, Kemps Creek	Estate Roads

For the purposes of consistency with other modification applications currently being assessed or prepared within the AIE, the proposed MOD 10 to the concept approval will continue to identify the AIE site with the previous site address of: **788-882 Mamre Road, Kemps Creek NSW 2178**.

For the purposes of the new SSDA (SSD-80331959), consistent with the SEARs issued, the site will be identified with the current address, **4 Pemul Place, Kemps Creek NSW 2178**. The site will generally be referred to as "**Lot 8**" of the AIE.

Irrespective of which address is used, the modification and new SSDA are proposed on the same allotment / site, legally identified as Lot 105 DP 1305965 within the AIE.

1.2.3. Approval History

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

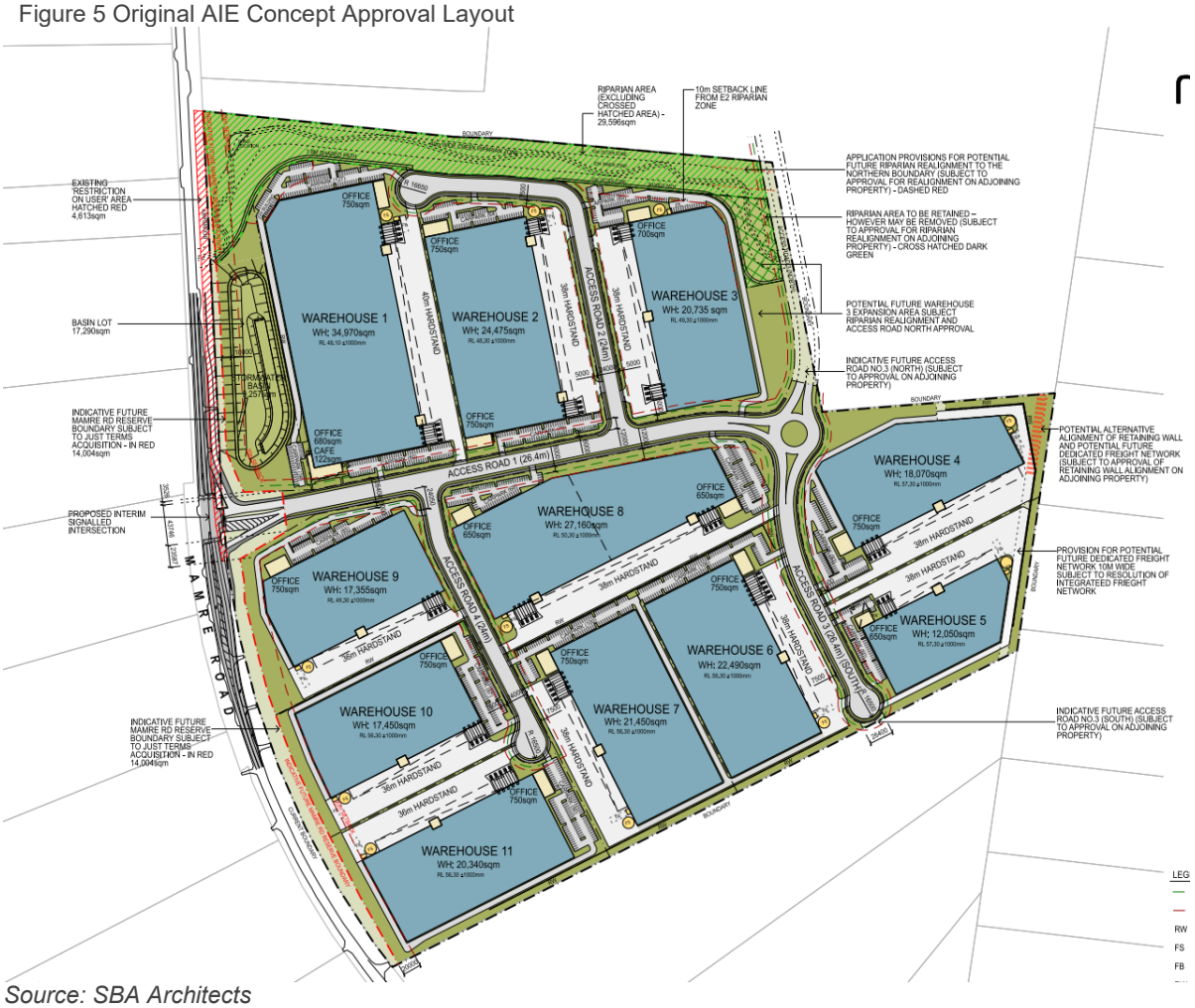
Table 5 below outlines the original approval for AIE, and the subsequent modifications and staged development applications approved or under assessment across AIE.

Table 5 AIE Approval History

DA Number	Description of Development
SSD-10448	A Concept Plan for the AIE comprising 11 industrial or warehouse and distribution centre buildings, internal road network layout, building locations, gross floor area (**GFA**), car parking, concept landscaping, building heights, setbacks and built form parameters. The Concept Consent assessed and approved all the ground works, ecology, flooding and Aboriginal and non-Aboriginal impacts and mitigation measures to facilitate the development of the Estate. Stage 1 development works comprising road and services infrastructure, site preparation works across the estate and construction of the warehouse and distribution and industrial buildings on Lots 1 and 3 along with subdivision of Stage 1. The original Concept Approval layout for the AIE is illustrated in **Figure 5** below.

DA Number	Description of Development

Figure 5 Original AIE Concept Approval Layout



Source: SBA Architects

SSD-10488 MOD 1	Modification Application 1 (**MOD 1**) was approved by DPHI on 25th August 2022, for a minor amendment to Condition D13 to the SSD-10448 development consent, to require a Works Authorisation Deed for a temporary access road connection to Mamre Road. This change was required by TfNSW.
SSD-10488 MOD 2	Modification Application 2 (**MOD 2**) to the Concept Proposal and the Stage 1 Development, proposed the relocation of Access Road 2 further west and shortening of its length, adjusted vehicle access to Lot 3 and revised parking provision across Lots 1, 2 & 3. Stage 1 modifications were proposed to the construction of Warehouse 1 and Warehouse 3, resulting in changes to GFA, car parking, hardstand and façades. MOD 2 was approved by DPHI on 30th November 2022.
SSD-10448 MOD 3	Modification 3 (**MOD 3**) sought to amend the Concept Plan to reconfigure the estate to reduce the overall number of lots from 11 to 9, relocate Access Road 4 and create new warehouse footprints, along with updating road subdivision, civils works and landscaping. MOD 3 was approved by DPHI on 2nd March 2023.
SSD-46516461 (Warehouse 9)	There was a concurrent SSD application for the development of Warehouse 9 on the Lot 9 at AIE to be amended through MOD 3. The application sought approval for the construction of new 66,341m^2 building for use as 'warehouse and distribution' to be built to a ridge height of 14.6m, comprising a warehouse, loading docks, dock offices, parking spaces and new vehicle crossovers, along with on lot landscaping and stormwater management. This application is identified as the "Stage 2" development. Warehouse 9 was approved by DPHI on 2nd March 2023.

DA Number	Description of Development
SSD-10448 MOD 4	Modification Application 4 (**MOD 4**) implemented an Estate wide 'concept' approach to waterway health. This informs the stormwater management measures to be included in future built form DAs across Aspect Industrial Estate (including Warehouse 8). MOD 4 incorporates Mirvac owned land at Elizabeth Enterprise Precinct at 1669-1732 Elizabeth Drive, Kemps Creek (Lot 5 DP860456 & Lot 741 DP810111) (**EEP**) within the SSD 10448 Approval. The updated water management approach relies on the inclusion of existing undeveloped, pervious land in the EEP to meet compliance targets (as an interim solution) to allow development on the AIE site to proceed prior to a regional waterway strategy being adopted. MOD 4 also modified the WSUD Strategy across AIE to support the proposed and future built form development across the AIE. MOD 4 was approved by DPHI on 8th January 2024.
SSD-46516458 MOD 1	A modification application to the Warehouse 9, Stage 2 development (SSD-46516461) as to remove the conflicting stormwater works on those lots which were approved as part of that consent and to build on the SSD-10448 MOD 4 approach to demonstrate how waterway health requirements can continue to be achieved on the site. SSD-46516458 MOD 1 was approved by DPHI on 23rd July 2024.
SSD-10448 MOD 5	The fifth modification (**MOD 5**) modified the Stage 1 Approval at the AIE site to support temporary vehicular access to the approved Warehouse 1, CEVA tenant operations. It introduces and modifies the conditions of consent that allow the temporary use of construction access roads for operational vehicular access to Warehouse 1 until such time as the Mamre Road intersection works are completed. MOD 5 was approved by DPHI on 12th December 2023
SSD-10448 MOD 6	The sixth modification (**MOD 6**) modified the Concept Proposal to reconfigure the estate with relation to the building form on Lot 8. This includes modification to the Warehouse 8 building footprint. This modification also to adjust the layout of hardstand across Lot 8, the provision of at-grade car parking spaces as well as the vehicular access driveways. See **Figure 6** below. MOD 6 was approved by DPHI on 14th October 2024

Figure 6 AIE MOD 6 Layout

Source: SBA Architects

DA Number	Description of Development
SSD-58257960 (Warehouse 2)	An SSD application for the development of Warehouse 2 on AIE Lot 2 in accordance with the masterplan layout as established by MOD 3. Warehouse 2 is proposed to be used for warehouse and distribution premises 24 hours a day 7 days a week. No specific operator has been secured for Warehouse 2. This application is identified as the "Stage 3" development. The design includes a 22,595m^2 warehouse space, 1,500m^2 office, 2002m dock office and 139 car parking spaces. This application is identified as the "Stage 3" development. SSD-58257960 was approved by DPHI on 5th July 2024.
SSD-60513208 (Warehouse 8)	An SSD application for the development of Warehouse 8 on AIE Lot 2 in accordance with the masterplan layout sought to be established by MOD 6. This includes construction of a single warehouse and distribution building to a height of 13.7m. This application is identified as the "Stage 4" development. The development includes: ▪ Warehouse 8 – 40,200m^2 ground floor warehouse area, 850m^2 of office space and a 300m^2 dock office. ▪ 180 car parking spaces. SSD-60513208 was approved by DPHI on 11th October 2024.
SSD-10448 MOD 7 & SSD-46516458 MOD 2	A modification application to the Warehouse 9, Stage 2 development SSD-46516461 (MOD 2) and to SSD-10448 (**MOD 7**) was prepared as to enable temporary access for operational vehicles associated with Warehouse 9 to be facilitated over two phases. SSD-10448 MOD 7 & SSD-46516458 MOD 2 was approved by DPHI on 15th July 2024. While SSD-10448 MOD 7 was lodged chronologically after SSD-10448 MOD 6, it was approved first and thus, the latest, consolidated conditions of consent and the latest masterplan layout was approved under SSD-10448 MOD 6.
DA24/0264	A Development Application for the development of Warehouse 6, Warehouse 7 and the estate café on AIE Lot 6 and 7 respectively, has been lodged to Penrith City Council for assessment, and subsequent determination by the Sydney Western City Planning Panel. The proposal also seeks to deliver the supporting infrastructure, hardstand, landscaping, carparking and driveway access across these two development lots. These works form a "Stage 5" development within the AIE. DA24/0264 was approved by Penrith City Council on 19th March 2025.
SSD-10448 MOD 8 SSD-46516461 MOD 3 SSD-58257960 MOD 1 SSD-60513208 MOD 1	An eighth modification (MOD 8) to SSD-10448 concurrent with modifications to the Stage 2, Stage 3 and Stage 4 development consents. These modifications would serve to facilitate the removal of a 5-hectare section of the southern lot at EEP (Lot 100 in DP1283398) from the SSD-10448 AIE Concept Plan approval, whilst continuing to ensure that AIE and EEP would cumulatively meet the requisite stormwater management and water quality targets, contained within the Integrated Water Cycle Management (IWCM) targets. The AIE Concept Plan approval conditions are also proposed to be updated to allow for development consent to be issued for works beyond the scope of stormwater management works on EEP land (Lot 100 in DP1283398 and Lot 741 in DP810111), subject to demonstrating ongoing cumulative compliance with the IWCM targets across both EEP and AIE. These modification applications are currently under assessment by DPHI.

1.2.4. WH8 Base Build Modification

As detailed in **Table 5** above, the development of Warehouse 8 building as a warehouse and distribution was approved under latest approval for the AIE Concept Masterplan SSD-10448 MOD 6 and the Stage 4, detailed SSDA (SSD-60513208). To facilitate the IVE Group printing tenant operations at Warehouse 8, updates to the approved development are required and are being progressed through multiple development applications. The updates have been separated and progressed into two "series" of applications, the first series of applications propose and assess the updates to the base building layout, while the second series of

applications (the subject of this EIS) propose and assess the new land use and operations. The series of applications are broken down below:

Series 1 – Base Build

1a. Update the Concept Approval (SSD-10448 MOD 9) – Base Build: to reflect the updated Lot / Warehouse 8 building layout, which will ultimately be required to support the IVE tenant operations.

1b. Update the Stage 4 Detailed SSDA (SSD-60513208 MOD 2) – Base Build: to reflect the updated Lot / Warehouse 8 building layout, which will ultimately be required to support the IVE tenant operations.

Series 2 – Fitout & Use (subject of this EIS)

2a. Introduce New 'Printing' Land Use (SSD-80331959) – Fitout & Use: to introduce a new 'printing' land use and operational fitout within the updated Lot / Warehouse 8 layout facilitated in applications 1a and 1b. This will

2b. Update the Concept Approval (SSD-10448 MOD 10) – Fitout & Use: to reflect the updates the carparking and landscaping details across Lot / Warehouse 8 to support the new 'printing' operations.

The updates have been separated into a "base build" and "fitout & use" series of applications since the introduction of a new land use can only be facilitated through a new development application (i.e. it cannot be introduced through a modification to the existing Stage 4 Detailed SSDA). However, preparing a new SSDA alone would be inefficient as it would functionally require the re-assessment of the development of a Warehouse 8 building.

The approach above and the separation of the application allows for a more flexible and efficient preparation / assessment of the intended tenant operations.

The Series 1 applications have been submitted to DPHI and include modifications to the Concept Proposal Development under SSD-10448 MOD 9 and Stage 4 Development under SSD-60513208 MOD 2 as follows:

- Modifications to the Warehouse 8 building layout, including the addition of a storeroom office and modifications to the office location and layout. The proposal will modify the approved Warehouse 8 GFA as follows:
  - Warehouse GFA: 39,800m^2 (-400m^2)
  - Main Office GFA: 2,000m^2 (+1,150^2)
  - Dock Office GFA: 370m^2 (+70m^2)
  - Storeroom GFA: 460m^2 (+460m^2)
- Modifications to on-lot car parking numbers and location. The development as proposed to be modified will include 197 on-lot car parking spaces at Warehouse / Lot 8 (addition of 16 spaces)
- Modification to the Warehouse 8 loading area, docks and awning layout.
- Modification to the car park and loading dock ingress/egress to Access Road 4.
- Modifications to the on-lot landscaping and tree canopy coverage.
- Modifications to location of fire-fighting infrastructure.

The base build applications have been prepared and assessed around the continued use of Lot / warehouse 8 as a warehouse and distribution centre.

Figure 7 Updated Lot / Warehouse 8 Site Plan Proposed under the Base Build Applications

Source: SBA Architects

At the time of writing, the Warehouse 8 Base Build Modifications have been formally lodged to DPHI and are under assessment.

The Series 2 – Fitout & Use series of applications, the subject of this EIS, has been designed and prepared assuming the approval of the updated Lot / Warehouse 8 layout seen in **Figure 7** above.

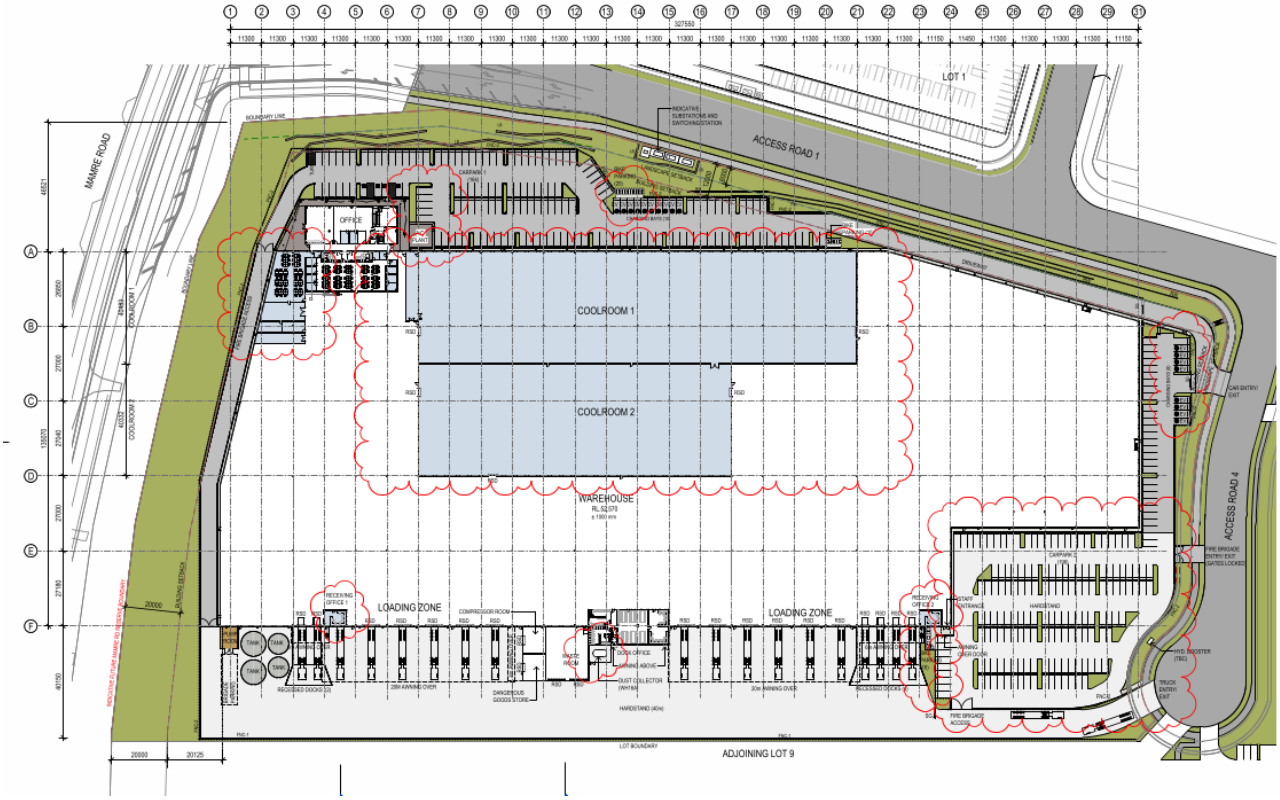
1.3. PROJECT OVERVIEW

The proposed modification and SSDA seeks to facilitate tenant operations at Warehouse 8, constituting IVE Group packaging and print operations.

- **SSD-10448 MOD 10**: Modify the Estate wide concept plan, including site layout, parking and landscaping. This includes an updated quantum of parking at Warehouse / Lot 8 to a total of 360 parking spaces to meet the proposed operational requirements. The warehouse specific acoustic condition in A16(a) is also proposed to be modified to enable cumulative sound power level of 98dBA from warehouse 8.
- **SSD-80331959**: Approval for a 'printing' operations as a form of 'other manufacturing industries' land use at Warehouse / Lot 8. Approval for fit-out works to facilitate the IVE Group printing operations.

The modified concept plan and the proposed land use fitout at Warehouse / Lot 8 are detailed in the Architectural Plans prepared by SBA Architects at **Appendix F**. The site plan is provided at **Figure 8** below.

Figure 8 Proposed Site Plan



Source: SBA Architects

The key objectives for the proposed development and the way in which these have been achieved are summarised in **Table 6**.

Table 6 Project Vision and Objectives

Objective	Proposed Development
Align with the Mamre Road Precinct's aim to support the need for additional logistics, industrial and urban services land, in response to long-term projected population and development growth in Sydney.	The proposal seeks to effectively utilise the limited supply of serviced and zoned employment land, integrating with existing and planned infrastructure. The proposal seeks to facilitate printing manufacturing operations as an operational tenant within the approved, employment building / lot which has been appropriately designed to support the new employment use and tenant requirements.
Contribute to the employment options for Western Sydney and build upon the opportunities presented by the Western Sydney Aerotropolis.	IVE Group are a major printing, media marketing and distribution company with commercial printing activities being a key product/service provided by IVE Group. IVE Group's printing operations are currently performed across their Granville, Homebush and Silverwater warehouse/industrial production buildings and the operations at AIE seek to consolidate the operations from these three existing sites. The consolidation of IVE Groups operations within the Western Sydney Aerotropolis (**WSA**) is a major opportunity and benefit for the employment market in the region.
Ensure minimal environmental and amenity impact by responding to the site context and key interfaces with surrounding lands including sensitive receivers.	The proposed development has been designed to minimize any adverse environmental impacts as detailed in **Section 6**.
Deliver high quality market leading industrial and logistics facilities.	The proposed development seeks to facilitate the printing manufacturing operations within the WH8 building which has been prepared to achieve a high-quality design with a visually

Objective	Proposed Development
	interesting and distinct building appearance, consistent with the appearance of approved AIE building designs.
Deliver sustainable development in line with Mirvac's sustainability objectives.	An Ecologically Sustainable Development (**ESD**) strategy has been prepared in support of the proposal, demonstrating alignment with Mirvac's sustainability objectives.

2. STRATEGIC CONTEXT

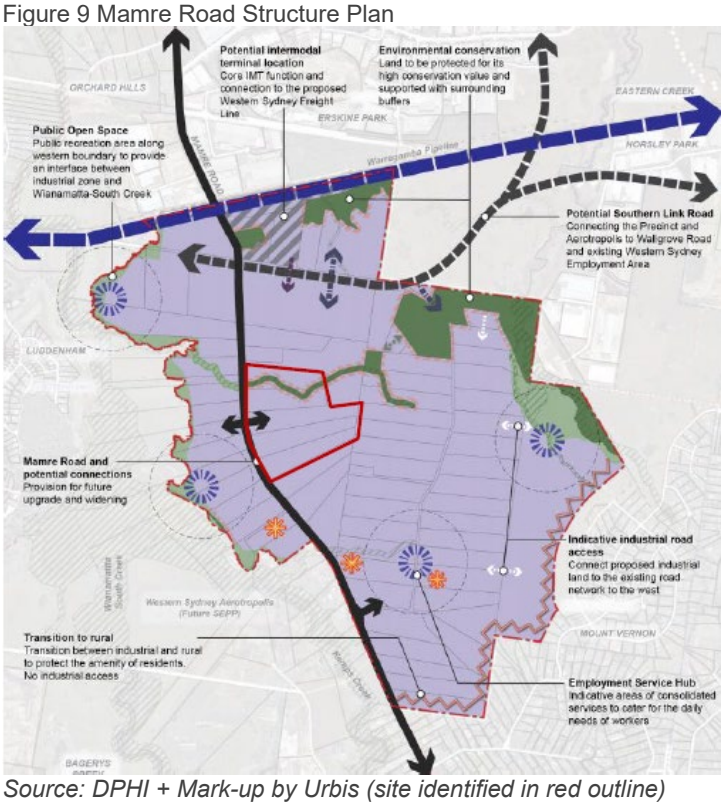
This section describes the way in which the modified proposal addresses the strategic planning policies relevant to the site.

2.1. PROJECT JUSTIFICATION

Table 7 Strategic Planning - Consistency Assessment

Plan	Consistency
Greater Sydney Region Plan	*The Greater Sydney Region Plan: A Metropolis of Three Cities* (**Greater Sydney Region Plan**) provides the overarching strategic plan for growth and change in Sydney. It is a 20-year plan with a 40-year vision that seeks to transform Greater Sydney into a metropolis of three cities - the Western Parkland City, Central River City and Eastern Harbour City. It identifies key challenges facing Sydney including increasing the population to eight million by 2056, 817,000 new jobs and a requirement of 725,000 new homes by 2036. The proposal supports the vision of the Region Plan as summarised below: ▪ **Infrastructure and collaboration**: The site is accessible to existing road infrastructure which provides strong connections to the wider region. The precinct fronts Mamre Road which provides direct access to the M4 Motorway, Great Western Highway and Elizabeth Drive. This road is undergoing detailed design for an upgrade by TfNSW to service the future employment lands. Through the Western Sydney City Deal, there are significant infrastructure commitments proposed to service the Western Sydney International Airport and significant road upgrades and public transport projects to support the future employment of the site and surrounding area. As such, the proposal will ensure that the employment land uses are operational in alignment with the intended infrastructure growth in the area. ▪ **Liveability:** The proposal will support the 30-minute city by providing employment to nearby residential suburbs. It is also surrounded by land identified for future employment. The proposed manufacturing use will be integrated within the Warehouse / Lot 8 layout and aligning with the broader AIE, will not negatively impact on surrounding residential areas. ▪ **Productivity:** The proposal development responds to the industrial land shortfall identified in the Region Plan and aims to respond to the market requirements of the intended tenants. The proposal will further realize the provision of industrial, employment land within the Western Sydney Aerotropolis. The site is well-located to the M4 and M7 Motorways and will support the vision for employment within the Western Sydney Aerotropolis.
Western City District Plan	The *Our Greater Sydney 2056 Western City District Plan* (**Western City District Plan**) is a 20-year plan to manage growth in the context of economic, social and environmental matters to implement the objectives of the Greater Sydney Region Plan. The intent of the District Plan is to inform local strategic planning statements and local environmental plans, guiding the planning and support for growth and change across the district. The proposal aligns with the vision of the District Plan, as summarised below: ▪ **Infrastructure and Collaboration:** The proposal will align with the approved collaboration between the AIE precinct development for the delivery of essential infrastructure needed to support the Western Parkland City. The proposal will align with the intended delivery of road infrastructure upgrades in the area as well as the necessary utility infrastructure. The proposal will not compromise the approved AIE's collaboration in delivery of essential infrastructure needed to support the Western Parkland City. ▪ **Liveability:** The proposal will ensure the realization of employment opportunities at the site accessible to nearby residents, thus contributing to the 30-minute city vision. ▪ **Productivity:** The site is within the WSA and surrounded by land identified for future employment. The proposal will supply industrial, employment operations within a land release area in response to long-term projected population and development growth. ▪ **Sustainability:** The proposal will be developed with a range of measures to mitigate, minimise or manage the potential environmental impact of the proposal. The proposal will not impact the approved stormwater management measures to protect and manage the existing natural systems and the proposed use will be delivered subject to ESD initiatives to minimise demand on infrastructure systems, such as sewer, water and electricity.

Plan	Consistency
Future Transport 2056	The *Future Transport Strategy 2056* sets the 40-year vision and strategy for managing the growth of transport services and infrastructure in NSW over the next 40 years. It has been developed alongside the Region Plan in order to provide an integrated planning framework for NSW, that supports the repositioning of Sydney as a metropolis of three cities. For Greater Sydney, the plan is also built on the same vision of the 30-minute city, which it says will be underpinned by an integrated network of city-shaping, city-serving and centre serving corridors. To support this vision, transport for NSW has established 6 outcomes for Greater Sydney which demonstrate its aspirations for transport over the next 40 years. These outcomes will be used to guide transport services and infrastructure in Greater Sydney to 2056. The identified and relevant Greater Sydney outcomes include: ▪ Successful places, ▪ A strong economy, ▪ Safety and performance, ▪ Accessible services, and ▪ Sustainability. Transport networks in the Western Parkland City will be developed in order to support sustainability and jobs growth in the District. The plan identifies that strategic transport corridors will integrate the city to create 30-minute connections to strategic centres and metropolitan centres and clusters. The WSA, as an economic catalyst, is also identified as a key node in this network that will be served by north-south rail links and east-west connections. The site is well placed to gain from the future transport network upgrades, especially with regard to the intended partial upgrade of Mamre Road which fronts the AIE precinct. The proposal will facilitate much needed increases to employment, activity and demand of travel in conjunction with the future increases in transport capacity.
Penrith Local Strategic Planning Statement	*The Penrith Local Strategic Planning Statement* (**LSPS**) was finalised on 23 March 2020. The LSPS identifies the vision and priorities for land use across the local government area (**LGA**), as well as outlines the special character and values of the place and how they will be managed into the future. The Structure Plan identifies land within Mamre Road Precinct within the Western Sydney Aerotropolis. The LSPS identifies Western Sydney Aerotropolis as a key employment generator for the LGA and seeks to create an economic triangle with Penrith CBD and St Marys. The LSPS defers the details on the types of employment within the Western Sydney Aerotropolis to the Western Sydney Aerotropolis Plan, the main strategic planning document guiding this growth area.
Western Sydney Aerotropolis Plan	The *Western Sydney Aerotropolis Plan* (**WSAP**) finalised in October 2020, has been developed by the Western Sydney Planning Partnership and sets the planning framework for the Western Sydney Aerotropolis. Mamre Road Precinct, including the site, is identified as one of ten precincts within the growth area. Mamre Road Precinct is an initial precinct to be brought forward to create early employment opportunities and better coordinate infrastructure planning. The WSAP identifies the planning pathway for Mamre Road Precinct under the Western Sydney Employment Area (**WSEA**) SEPP, as the future employment land uses anticipated for the precinct align with the existing objectives of the WSEA. The Structure Plan identifies land within Mamre Road Precinct to be zoned for flexible employment with intended land uses being industrial, warehousing and logistics. The statutory planning pathway will be separate from the remaining Aerotropolis precincts, and the Mamre Road Precinct has its own Development Control Plan. Part 5 of the WSAP outlines measures to protect the 24-hour operations of the Western Sydney (Nancy-Bird Walton) International Airport. Key initiatives include: ▪ Preventing the encroachment of noise-sensitive land uses into areas affected by aircraft noise and operational airspace. ▪ Locating buildings to avoid wind shear and turbulence. ▪ Managing wildlife attraction. ▪ Locating wind turbines appropriately. ▪ Ensuring lighting does not distract/confuse pilots. ▪ Maintaining an obstacle free operational space. ▪ Ensuring off-airport development does not impact the communication, navigation and surveillance (CNS) equipment.

Plan	Consistency
	▪ Managing land uses in public safety areas. The proposal does not impact the future airport operations and will deliver an appropriate land use in proximity to the future airport.
Western Sydney Employment Area	The AIE forms part of the strategically significant employment precinct known as the WSEA, which is identified and endorsed in Region, District and local planning strategies. Since the delivery of the M7 Motorway, the WSEA has developed rapidly into a freight and logistics hub which rivals many other industrial locations in Greater Sydney. The greenfield location offers opportunities for modern, custom design facilities and its proximity to Sydney's Motorway Network provides convenient access to Port Botany and Sydney Airport without the exposure to the congestion and vehicle restrictions present in many of the more established, inner ring industrial areas. Shifting land economies in these inner ring areas has also contributed to the growing dominance of the WSEA in Sydney's industrial market due to its ability to offer a supply of large, flat sites at a competitive market rate. The importance of WSEA for employment will further be amplified through the delivery of the Western Sydney International (Nancy-Bird Walton) Airport, which will open 24-hour airport operations to Greater Sydney. The WSEA supports the economy's global function and promotes employment, such as industrial uses, freight, logistics and research and development functions, as well as opportunities for agribusiness and food production. The proposal aligns with the strategic intentions of the WSEA as it aims to deliver employment land within the area, satisfying the opportunities afforded to the area. The proposed modifications will contribute to the competitive edge of this employment area through securing operational tenants in the area.
Mamre Road Structure Plan	The *Mamre Road Structure Plan* identifies the development intent for the precinct, highlighting future industrial, environment and drainage areas, as well as identifying key infrastructure required to support the precinct, as illustrated in **Figure 9** below. The proposal delivers on the intent of the Structure Plan as it relates to the subject land. Consistent with the vision of the precinct, the development will not result in any adverse ecological impacts and will appropriately mitigate any potential acoustic impacts to noise sensitive receivers. The proposal will not negatively impact quality of the riparian corridor that is located within the AIE precinct. Figure 9 Mamre Road Structure Plan  *Source: DPHI + Mark-up by Urbis (site identified in red outline)*

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

2.2. KEY FEATURES OF SITE AND SURROUNDS

2.2.1. Site Description

The site is located within Lot 8 of the AIE. The AIE covers an area legally described as Lot 301 DP1305254, Lot 305, DP1305254, Lot 104, DP1305965 and Lot 105 DP1305965, and is currently owned by Mirvac. The site is identified as 4 Pemul Place, Kemps Creek, located within the AIE.

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

The AIE is identified as employment land, as this site and the broader Mamre Road Precinct has been rezoned to, primarily, IN1 General Industrial under the *State Environmental Planning Policy (Industry and Employment) 2021* (**I&E SEPP**). The site is located on Deerubbin Country.

The location of the site and the current site context is illustrated in **Figure 10** below.

Figure 10 AIE Site Aerial

Source: Nearmap 2024 + Urbis Mark-Up

The key features of AIE which have the potential to impact or be impacted by the proposed development are summarised in **Table 8** below.

Table 8 AIE and Site (Lot 8) Description

AIE and/or Site Characteristic	Description
Country	Deerubbin Country
AIE Legal Description (Title Particulars)	Lot 301 DP1305254, Lot 105 DP1305965, Lot 305, DP1305254 and Lot 104, DP1305965
Number of existing lots (AIE)	4
Site Ownership	Owned by Mirvac
Zoning (Lot 8)	IN1 General Industrial
Existing Use / Structures	The site has previously supported agricultural uses including farming and grazing. The AIE is mostly cleared with scattered vegetation and includes a series of farm dams, with a watercourse traversing the site from the north-west along the site northern boundary. The site has an approved use for a warehouse distribution centre under SSD-10448. Site preparation works have been undertaken across the site in accordance with the approved Stage 1 development. Construction of Warehouse 1, Warehouse 3 and Warehouse 9 is currently underway and/or completed in accordance with the approved Concept Proposal and Staged development at the site. The earthworks approved under the Stage 1 consent are being undertaken on Lot 8 and will create flat building pads from which future development will occur.
Site Area	AIE Site Area: approx. 55.83 hectares Lot 8 Area: 75,710m^2
Site Frontages	AIE: Mamre Road to the west. Lot 8: Access Road 1 to the north, Access Road 4 to the east
Services (AIE)	Services connections to the AIE are to be provided in accordance with SSD-10448.
Topography (AIE)	The AIE had a peak located to the north- eastern corner of the site (70 AHD) and slopes to the western boundary of Mamre road (40 AHD). Approval has been granted by way of SSD-10448 for earthworks to establish the future road and development pad levels across the AIE.
Vegetation (AIE)	Native vegetation across the AIE is limited to small patches and sparsely scattered through the site. Conservation and removal of vegetation at the site will be conducted in accordance with the Concept Proposal and Stage 1 Approval SSD-10448.
Hydrology (AIE)	The AIE is located within the South Creek sub-catchment with two unnamed watercourses within the estate (located to the north of Lots 1, 2 and 3 of the AIE).
Heritage (AIE)	No identified State or local items of environmental heritage are located on the AIE.
Aboriginal Archaeology (AIE)	Aboriginal archaeology identified various artefacts and objects across the AIE. An Aboriginal Cultural Heritage Assessment Report was completed for the Concept Proposal and Stage 1 Development, and conditions of consent relating to aboriginal heritage were placed on the approval of SSD-10448.
Bushfire	The AIE is mapped as containing Category 2 Bushfire Prone Vegetation. Principles to address bushfire risk were established as part of the Concept Approval SSD-10448 including an APZ along the site's northern extent. The proposal will not change the findings of that bushfire risk assessment.

AIE and/or Site Characteristic	Description
Contamination (AIE)	A Phase 1 and 2 Contamination Assessment was prepared in support of SSD-10448 by JBS&G and Arcadis. These reports identified contaminates on the site as well as the recommended mitigation measures to appropriately dispose of the contamination. Conditions were included in the consent that will remove the contamination from the site before the works commenced. This remediation work has been completed.
Vehicular/Site Access	Vehicular Access into the AIE is provided from Mamre Road. Access to Lot 8 will be provided via Access Road 4.
Western Sydney International Airport's ANEF	The site is affected by the contour 20, in accordance with 9.1 Local Planning Directions 3.5 and 7.8 of the EP&A Act.

2.2.2. Elizabeth Enterprise Precinct

The Mirvac EEP site is located at 1669A Elizabeth Drive, Badgerys Creek and 1669-1723 Elizabeth Drive, Badgerys Creek within the Penrith Local Government Area (LGA). The site is approximately 15km south-east of the Penrith CBD and 40km west of the Sydney CBD, and approximately 800m to the east of the currently under construction WSA. The site was included into the Concept approval area of SSD-10448 by MOD 4 to that consent.

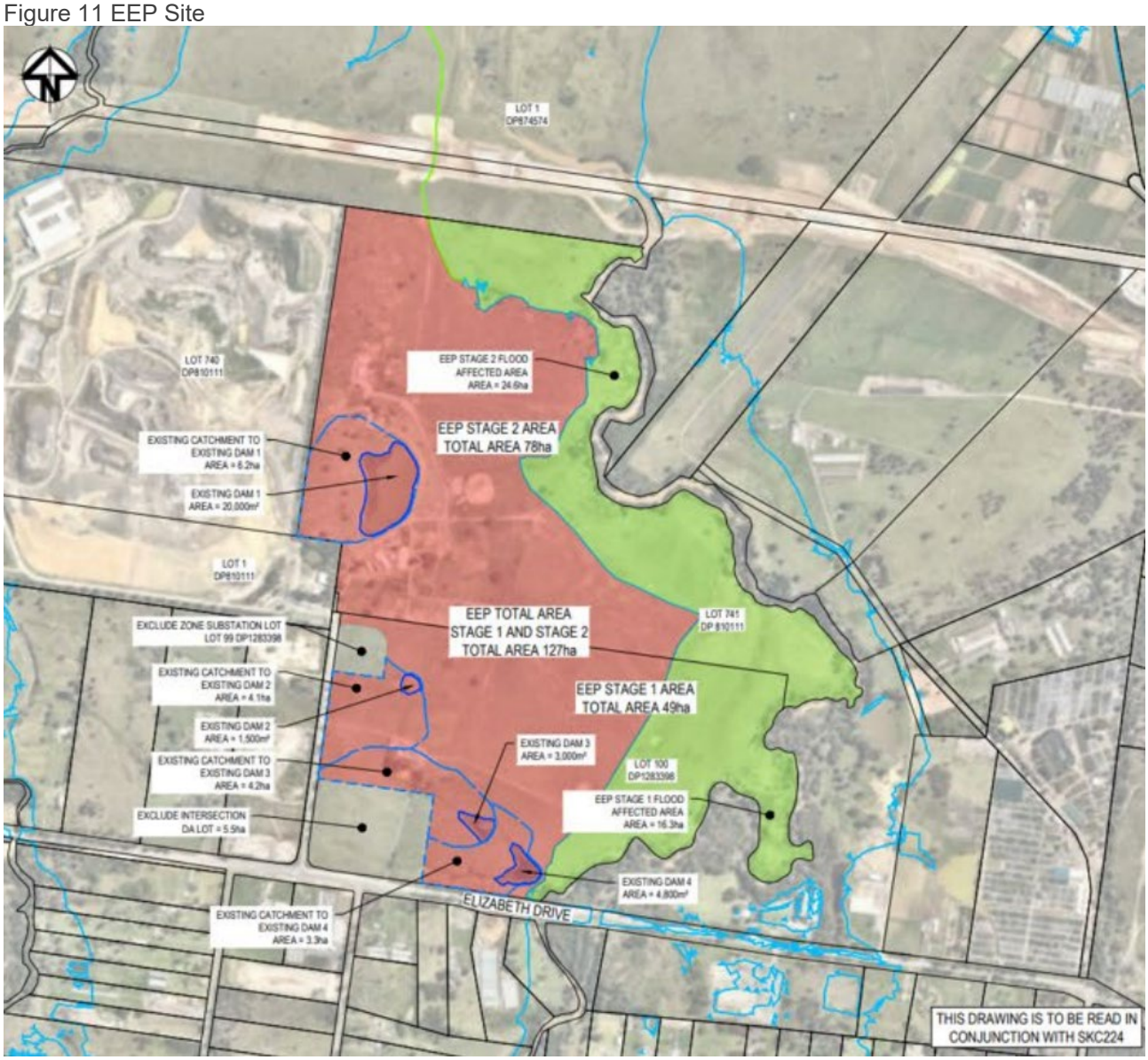
The site is legally described as Lot 100 in DP1283398 with an area of approximately 55.4 ha and the site immediately to the north, Lot 741 DP810111 with an area of approximately 77.6 ha.

Existing structures on the subject site consist of rural residential uses including a single storey farm shed located towards the site's western boundary, surrounded by smaller storage sheds. Surrounding this are paddocks utilised for minor grazing. Several existing man-made dams are located within the subject site as shown within **Figure 11** below.

The site's primary access is via Elizabeth Drive, with a driveway located 50m east of Elizabeth Drive and Martin Road intersection. An additional access to the site is provided through a driveway off the unnamed public road access which runs along the site's western boundary, located approximately 340m north of the access road's intersection with Elizabeth Drive.

To note, the proposal does not propose any amendments or development at the Mirvac EEP Site. The extent of the Mirvac owned EEP site is illustrated in **Figure 11** below:

Figure 11 EEP Site

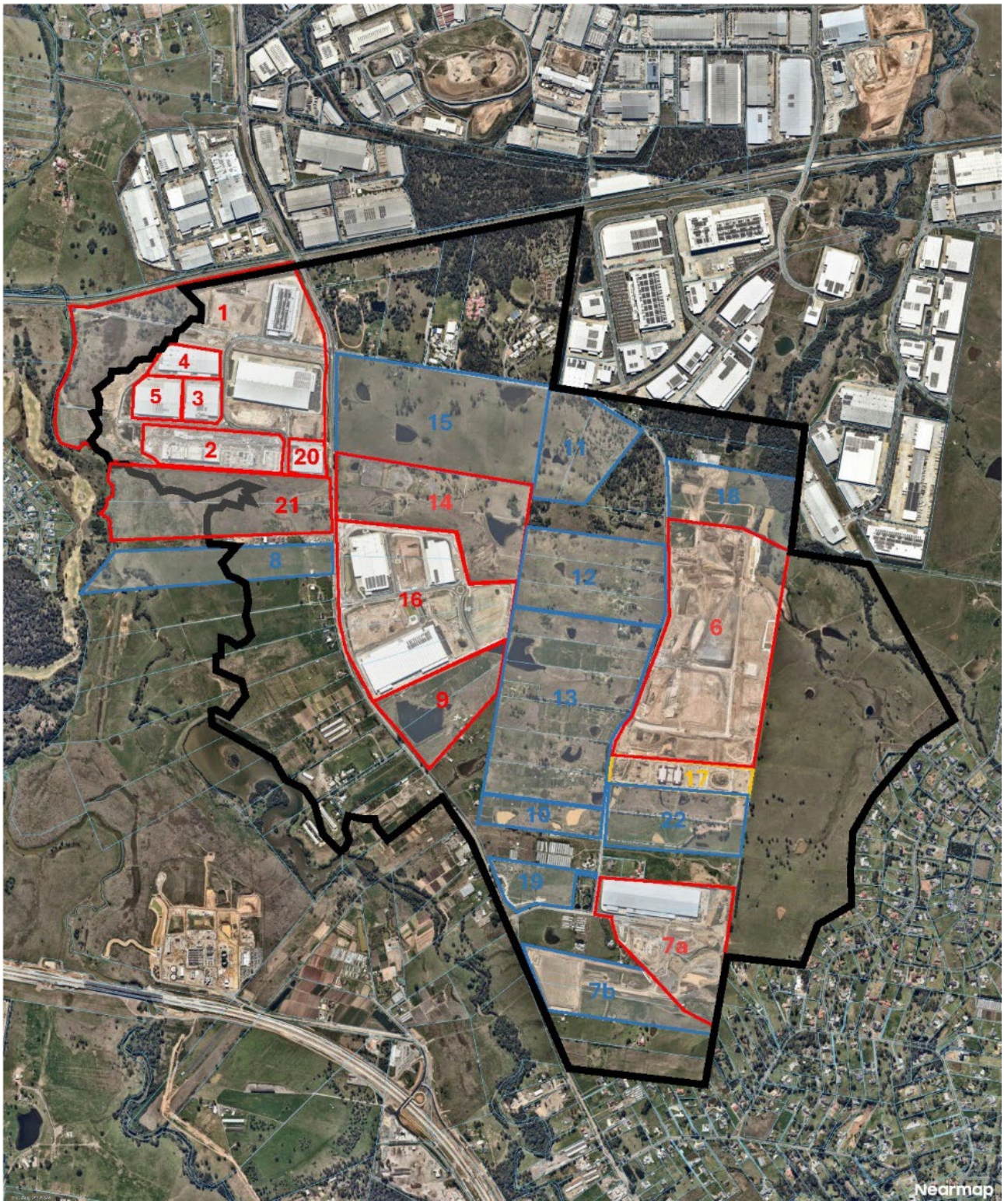


Source: AT&L

2.2.3. Surrounding Context

The AIE is located within the Mamre Road Precinct which is zoned under the I&E SEPP. The surrounding area are in the process of accommodating a number of industrial, warehouse and logistics developments summarised in the following **Figure 12** and **Table 9**.

Figure 12 Neighbouring Development Applications



Source: Nearmap + Urbis Markup

Table 9 Approved and Future Developments

Reference Number	Site	Landowner	Status	GFA Proposed / Approved (Warehouse, logistics and industrial facilities)
1	SSD-9522: The Yards	Frasers / Altis JV	Latest Mod Determined: MOD 5 MOD 6 : under Assessment	**MOD 5 (approved): 188,153sqm** MOD 6 (proposed): 213,845sqm
2	SSD-10101987: Kemps Creek Data Centre	ARUP	Determined Mod 1: to be lodged	**Original Consent 60,943sqm**
3	SSD-25725029: ARDEX Warehouse and Manufacturing Facility	Frasers / Altis JV	Approved Mod 1: under assessment	**27,470sqm**
4	DA22/1172: Probiotic Warehouse Facility	Frasers / Altis JV	Approved	**29,768sqm**
5	DA22/0671: Cargoline Warehouse	Frasers / Altis JV	Approved	**30,581 sqm**
6	SSD-10479: 200 Aldington Road Concept Proposal ▪ MOD 1 /2 /3 ▪ Detailed SSDAs: SSD-61212208 / SSD-64589711 / SSD-64583708	Stockland & Fife Capital	Concept Proposal: ▪ MOD 1: Determined ▪ MOD 2/3: Assessment SEARs received (detailed SSDAs)	**325,913sqm (approved Concept Proposal)** ▪ **50,300sqm (approved Stage 1)** ▪ 249,528sqm (MOD 2 proposed Concept Proposal)
7a	SSD-9138102: Westlink Industrial Estate Stage 1	ESR	▪ Latest Mod Determined: MOD 5 ▪ MOD 1/4: under Assessment	**Stage 1 (Mod 5 approved): 81,317sqm**
7b	SSD-46983729: Westlink Industrial Estate Stage 2	ESR	Stage 2: Assessment	40,720sqm
8	SSD-30871587: 805-817 Mamre Road, Kemps Creek	805 Property Trust	Response to Submissions	25,340sqm
9	SSD-17647189: Access Logistics Estate (884-928 Mamre Road, Kemps Creek)	Altis Property Partners	Determined	**39,161sqm**
10	SSD-23480429: Westgate 253-267 Aldington Road	Icon Oceania	Response to Submissions	45,530sqm

Reference Number	Site	Landowner	Status	GFA Proposed / Approved (Warehouse, logistics and industrial facilities)
11	SSD-74784709: 1-51 Aldington Road Estate	The Gibb Group Developments Discretionary Trust	SEARs received	43,310sqm
12	SSD-32722834: Dexus Kemps Creek – 113-153 Aldington Road	Dexus Wholesale Management Limited	Assessment	68,914sqm
13	SSD-17552047: The Edge Estate (155-217 Aldington Road Estate)	Frasers Property Industrial	Assessment	153,343sqm
14	SSD-10272349: Yiribana Logistics Estate	The GPT Group	Determined	**54,982 sqm**
15	SSD-30628110: Summit at Kemps Creek 706-752 Mamre Road	Aliro and ISPT	Response to Submissions	244,413sqm
16	Aspect Industrial Estate SSD-10448 (Concept Proposal & Stage 1)	Mirvac	Concept and Stage 1 - Latest Mod Determined: MOD 6 Stage 2, Stage 3 & Stage 4 approved	**Concept Proposal: 247,646sqm**
17	DA17/1247: BAPS Temple	BAPS Temple	Approved	19,198 sqm (place of public worship)
18	DA22/0530: 74 - 104 Aldington Road	Fife Land 3 Pty Ltd	Approved	N/A (subdivision and site preparation works for future warehouses)
19	DA24/0703: 285 Aldington Road Warehouse	ESR	Assessment	41,403sqm
20	DA22/0205: 657-769 Mamre Road, Kemps Creek Lot 9 Warehouse	Frasers / Altis JV	Approved	**18,742sqm**
21	DA23/0067 Yiribana Industrial Estate, 771-781 Mamre Road, Kemps Creek	The GPT Group	Approved	**24,953sqm**
22	DA24/0268: 258-270, 244-256, and part of 272 Aldington Road.	Stockland Development Pty ltd	Assessment	N/A (subdivision and site preparation works for future warehouses and access road)

2.3. ANALYSIS OF FEASIBLE ALTERNATIVES

Clause 192(1)(c) of the *Environmental Planning and Assessment Regulation 2021* (**EP&A Regulation**) requires an analysis of any feasible alternatives to the proposed development, including the consequences of not carrying out the development. The proposal has been reviewed and is proposed by Mirvac to facilitate the timely operation of the approved Warehouse 8 building.

SSD-10448 MOD 10

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

The estate layout is being refined to meet the need of the future operators under the WH8 Base Build Modification (SSD-10448 MOD 9 & SSD-60513208 MOD 2) with updates to the acoustic limits, hardstand and landscaping areas under MOD 10 to facilitate the operational requirements for the IVE Group printing operations.

Warehouse 8 Fit-out & Land Use

The Warehouse 8 fit-out and land use sought are proposed to be located within the building and lot layout being sought via the WH8 Base Build Modification and MOD 10.

The project alternative options are listed and discussed in the following table.

Table 10 Project Alternatives

Option	Assessment
Option 1 – Consequences of not carrying out the development.	The 'do nothing' approach would limit the operation of the approved Warehouse 8 building for the intended tenant operations. The do-nothing approach would mean that the approved Warehouse 8 would remain inoperable when completed. This will conflict with the intended programming for the construction and operation of the Warehouse 8 as established in the approved development and sought to be facilitated. This is not an economic use of land and does not facilitate a suitable response to current market conditions and demand.
Option 2 – Alternate Lot 8 Design	Multiple layout options were analysed when considering the AIE Concept Master Plan in the approval of SSD-10448 and subsequent modification applications With the warehouses not yet constructed across the estate, flexibility is afforded for future tenants to ensure warehouse designs meet their specific needs, which has been reflected in the later modifications sought to SSD-10448. Mirvac has secured a future tenant for Warehouse 8, who have carefully chosen the design reflected within the architectural plans to both suit their requirements and also ensure suitable environmental outcomes consistent with SSD-10448. The proposal will accommodate the intended operational requirements for IVE Group. As the above option is not conducive to progressing the operations of the approved Warehouse 8 building, Mirvac is seeking to obtain consent for operations at the site in support of the intended IVE Group tenancy. The proposal has been designed to facilitate updates to the building and supporting facilities across the site that are effective and will result in minimal amenity and environmental impacts.

3. PROJECT DESCRIPTION

3.1. OVERVIEW

The AIE is currently being developed in line with the Concept Proposal and Stage 1 Development (SSD-10448), which received approval from the Minister for Planning on May 24, 2022. This approval included a Masterplan and Subdivision Plan outlining the designated lot layout and building envelopes.

Detailed development consent (SSD-60513208) has been granted for constructing a warehouse and distribution facility on Warehouse 8 / Lot 8 within AIE. The proposed modification applications aim to facilitate future operations at Warehouse 8 / Lot 8 by updating the elements of the Concept Proposal and Stage 1 Development under SSD-10448 MOD 9 and the Stage 4 Development under SSD-60513208 MOD 2.

As detailed in **Section 1.2.3**, a series of "base build" modification applications to the Lot / Warehouse 8 building layout have been prepared and have been lodged to DPHI, the updated layout designed to support the IVE tenant operations. The proposal , has been designed and prepared assuming the approval of the updated Lot / Warehouse 8 layout proposed under the "base build" modification applications. The table below provides a breakdown of the proposal.

Table 11 Project Summary

Key Element	Proposal
Project Area	AIE Site Area: approx. 55.83 hectares Warehouse / Lot 8 Area: 75,720m^2
Project Description	Facilitate tenant operations at Warehouse 8, constituting IVE Group packaging and print operations. The project comprises two components separately described below. **SSD-10448 MOD 10** ▪ Modify the Estate wide concept plan, including site layout, parking and landscaping. This includes an updated quantum of parking at Warehouse / Lot 8 to a total of 360 parking spaces to meet the proposed operational requirements. The warehouse specific acoustic condition in A16(a) is also proposed to be modified to enable cumulative sound power level of 98dBA from warehouse 8. **Fit-Out and Use SSDA (SSD-80331959)** ▪ Approval for '*printing*' operations as a form of '*other manufacturing industries'*, land use at Warehouse / Lot 8. ▪ Approval for fit-out works to facilitate the IVE Group packaging and print operations.
Expected, Estimated Development Cost	$53,538,163

3.2. SSD-10448 MOD 10 – CONCEPT PROPOSAL MODIFICATION

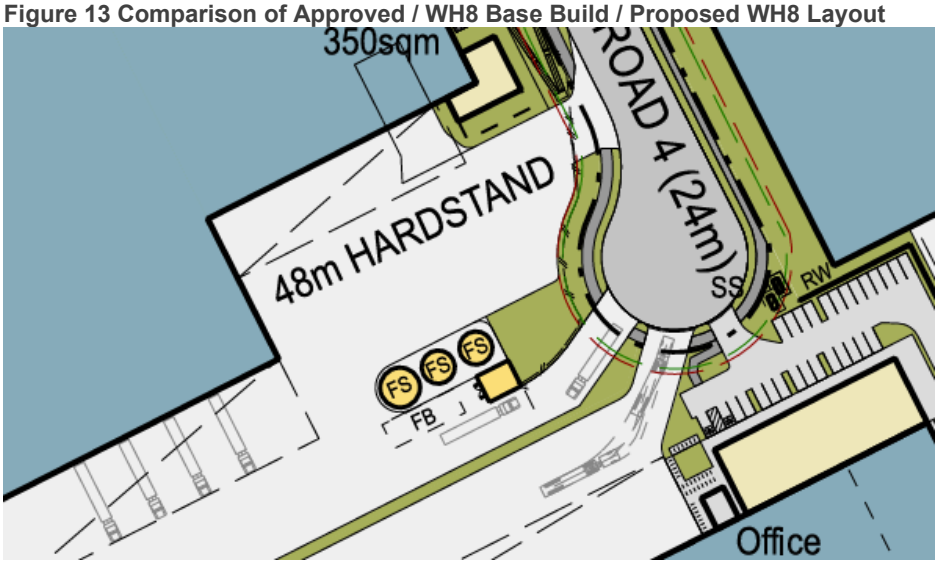
This modification application is sought under Section 4.55(2) of the Environmental Planning and Assessment Act 1979. The key components of the proposed development are listed in the following table.

Table 12 Concept Proposal Modification – Details

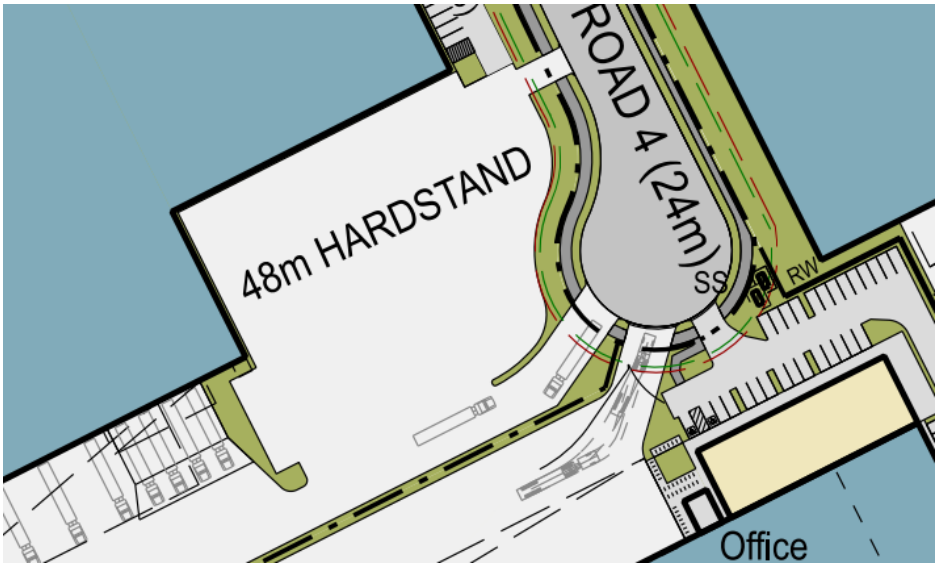
Item	Assessment
Project Area	The AIE has a total site area of 55.83 ha. Approval has been granted for the disturbance of the entire site area. EEP extends to some 132ha.
Site Description	Aspect Industrial Estate: 788-882 Mamre Road, Kemps Creek / Lot 301 DP1305254, Lot 305, DP1305254, Lot 104, DP1305965 and Lot 105 DP1305965.

Item	Assessment
	Elizabeth Enterprise Precinct: 1669A Elizabeth Drive, Badgerys Creek and 1669-1723 Elizabeth Drive, Badgerys Creek / Lot 100 DP1283398 & Lot 741 DP810111.
Project Description	The proposed modification includes the modifications to the following: ▪ *Appendix 1, Table 5 Schedule of Approved Plans – Concept Proposal*. Update the conditioned plans with the updated plans at **Appendix F** which reflects the proposed changes detailed in **Section 3.2.2** of this Modification Report. ▪ *Appendix 1, Figure 1: Concept Proposal*. Update the conditioned concept proposal masterplan with the updated plan at **Appendix F** which reflects the proposed changes detailed in **Section 3.2.2** of this Modification Report. ▪ *Appendix 1, Figure 1A: Tree Canopy*. Update the conditioned tree canopy plan with the updated plan at **Appendix H** which reflects the proposed changes detailed in **Section 3.1** of this Modification Report.
Modifications	The proposal seeks to modify the following elements across Warehouse / Lot 8 (as compared to the building/lot layout to be determined under the WH8 Base Build Modifications): ▪ **Modifications to on-lot car parking numbers and location.** The development as proposed to be modified will include 360 on-lot car parking spaces at Warehouse / Lot 8 (addition of 163 spaces compared to the WH8 Base Build Modifications) in support of the proposed printing manufacturing operational requirements. The additional on-lot carparking is proposed to be accommodated by converting areas of approved hardstand (located south-east corner of the lot) into at-grade, light vehicle carparking spaces. The distribution of the proposed carparking is: – Carpark 1: 164 spaces (no change compared to approved or WH8 Base Build) – Carpark 2: 196 spaces (addition of 163 spaces compared to WH8 Base Build Modifications). The proposed increase in parking is required to support the operational requirements and staffing numbers for the IVE Group operations as detailed in the **Section 3.3** below. ▪ **Modifications to the acoustic requirements.** The printing operations require specific external mechanical plant, which produces a cumulative SWL in excess of 90 dBA. The project team has explored mitigation measures that could be incorporated into the plant to reduce the SWL and the cumulative assessment identifies that the proposal will maintain compliance with the Condition A16(b) noise limits at all receivers. As such, the intention of the condition will still be achieved, despite a non-compliance with the conditioned 90 dBA limit per warehouse under Condition A16(a) and thus, Condition A16(a) is proposed to be modified to reflect the updated acoustic requirements for Warehouse 8. Further details of the acoustic assessment is provided at **Section 6.2** of this EIS. ▪ **Modifications to the on-lot landscaping and tree canopy coverage.** The development as proposed to be modified will implement additional tree/landscape islands across the proposed light vehicle carparking area, in accordance with the MRP DCP requirements. The proposed islands will increase the on-lot tree canopy coverage to 11,977m^2 / 16%. Comparative extracts of the approved, WH8 Base Build and proposed carpark / landscaping to be modified is provided in the figure below.

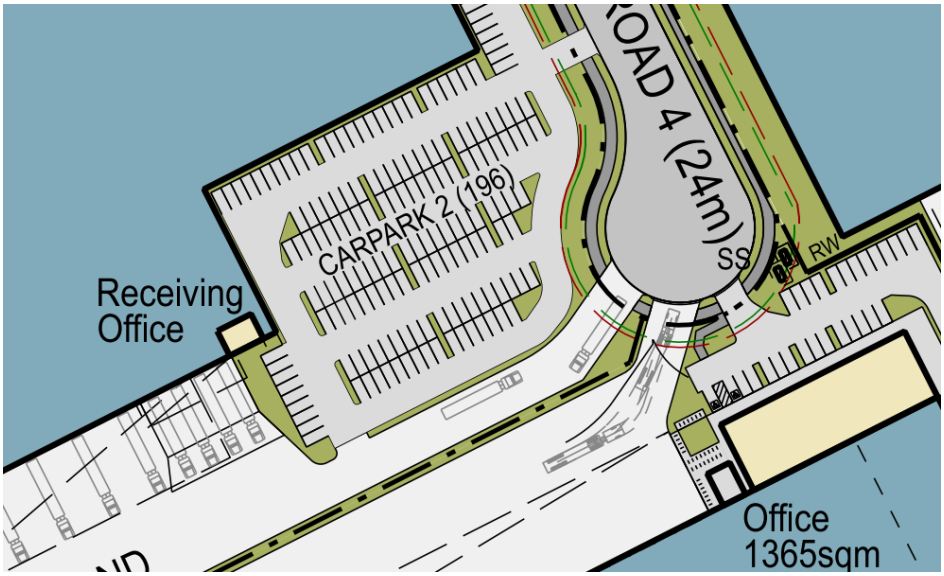
Figure 13 Comparison of Approved / WH8 Base Build / Proposed WH8 Layout



Picture 1 Approved Warehouse / Lot 8 Layout



Picture 2 WH8 Base Build Modifications Warehouse / Lot 8 Layout



Picture 3 Proposed Warehouse / Lot 8 Layout

3.2.1. Quantitative Comparison with Concept Proposal Consent

The proposed modifications to the concept proposal masterplan's area calculations are detailed in the following table.

Table 13 Concept Proposal Quantitative Comparison

Metric	Latest Approval (SSD-10448 MOD 6)	WH8 Base Build (SSD-10448 MOD 9)	Proposed (SSD-10448 MOD 10)	Difference from WH8 Base Build
Mamre Road Reserve Area	14,004m^2	14,004m^2	14,004m^2	nil
Access Roads Area	39,876m^2	39,876m^2	39,876m^2	nil
Future Roads Area	3,570m^2	3,570m^2	3,570m^2	nil
Creek Riparian Area	29,718m^2	29,718m^2	29,718m^2	nil
Retained Riparian Area	4,042m^2	4,042m^2	4,042m^2	nil
Basin Lot Area	18,109m^2	18,109m^2	18,109m^2	nil
Total Developable Area	449,004m^2	449,004m^2	449,004m^2	nil
Total Office (incl. dock office)	9,916m^2	11,136m^2	11,136m^2	nil
Total Warehouse Area	233,975m^2	234,035m^2	234,035m^2	nil
Café	125m^2	125m^2	125m^2	nil
Total Building Area (GFA)	244,016m^2	245,296m^2	245,296m^2	nil
Restriction on User Area	4,613m^2	4,613m^2	4,613m^2	nil
Warehouse 8				
Site Area	75,710m^2	75,710m^2	75,710m^2	nil
Office	850m^2	2,000m^2	2,000m^2	nil
Warehouse	40,200m^2	39,800m^2	39,800m^2	nil
Dock Office	300m^2	370m^2	370m^2	nil
Store	-	460m^2	460m^2	nil
Total GFA	41,350m^2	42,630m^2	42,630m^2	nil
Carpark 1 Provided	152	164	164	nil
Carpark 2 Provided	29	33	196	+163

3.2.2. Modifications to Conditions of Consent – SSD-10448 MOD 10

This section outlines the proposed modification to the conditions of consent included in SSD-10448. Conditions to be modified by the SSD-10448 MOD 10 application are detailed in below, changes are in red.

PART A CONDITIONS FOR CONCEPT PROPOSAL

NOISE LIMITS

A16. The Applicant must:

(a) ensure the cumulative noise emission of fixed external mechanical plant for each warehouse building does not exceed a sound power level (SWL) of 90 dB(A) (except Warehouse 8 whose fixed external mechanical plant must not exceed a cumulative sound power level (SWL) of 98 dB(A)) *and do not exhibit tonal characteristic or strong low frequency content; and*

APPENDIX 1 CONCEPT PROPOSAL

Table 5 Schedule of Approved Plans – Concept Proposal

Drawing No	Title	Issue	Date
Architectural Plan prepared by SBA Architects			
~~*MP6-02*~~ *MP01*	*Aspect Industrial Estate Lots 1-5 (DP 1285305) Mamre Road, Kemps Creek – SSDA-MOD ~~6~~ 10 Estate Masterplan*	~~*C*~~ *B*	~~*02/04/2024*~~ *03/04/2025*
Landscape Plan prepared by Site Image Landscape Architects			
003	*Aspect Industrial Estate Kemps Creek Landscape-Masterplan ~~MOD 6~~ IVE Fitout*	~~*I*~~ *A*	~~*04/04/2024*~~ *08/04/2025*
Tree Canopy Plan prepared by Site Image Landscape Architects			
~~*MOD6_SK001*~~ *2001*	*Kemps Creek Lots 1,2 & 5 DP 1285305 & Lots 6 & 7 DP 1291562 Mamre Road Kemps Creek Tree Canopy Plan*	~~*D*~~ *02*	~~*04/04/2024*~~ *15/04/2024*

Delete Figure 1: Concept Proposal

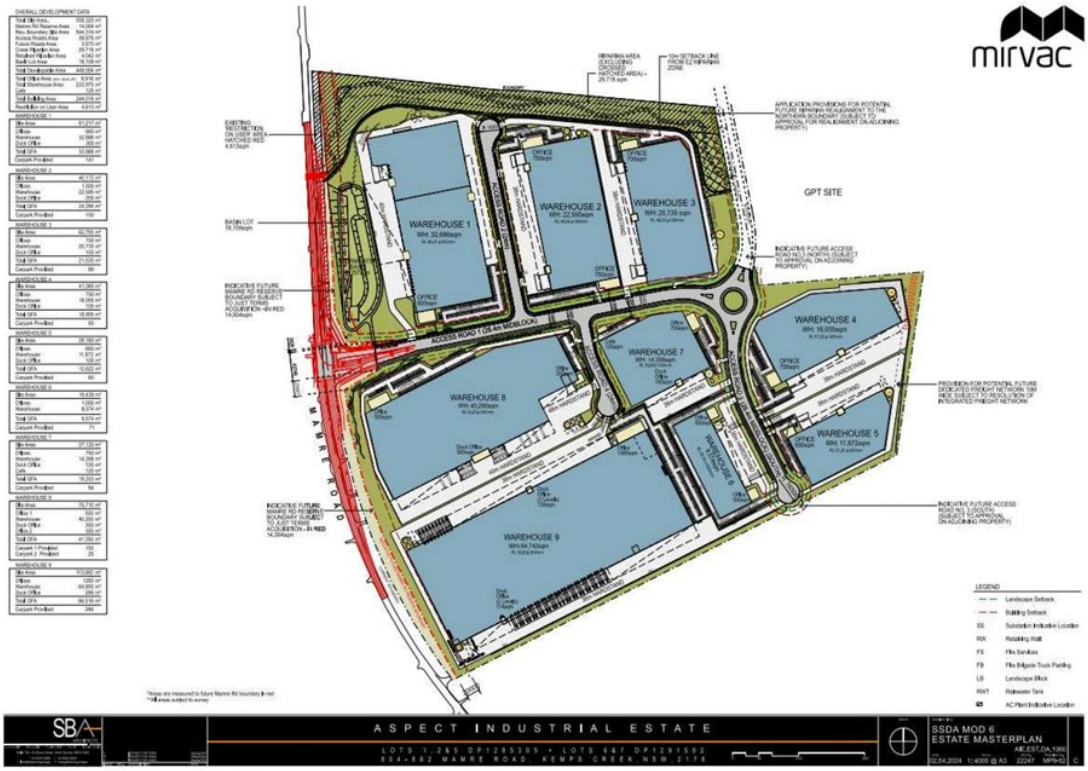


Figure 1: Concept Proposal

Insert new Figure 1: Concept Proposal

Delete Figure 1A: Tree Canopy Plan

Figure 1A: Tree Canopy Plan

Insert new Figure 1A: Tree Canopy Plan

3.2.3. Substantially the Same Development – SSD-10448 MOD 10

Based on the extent of the proposed modifications detailed above, it is considered that SSD-10448 MOD 10 remains substantially the same development as that to which consent was originally granted for SSD-10448, as is required by section 4.55(2) of the Act. This is due to the following:

- The key principles of the approved development remain unchanged with the Concept Proposal delivering logistics and industrial employment uses across the estate. The development will remain consistent with the land use objectives for Zone IN1 General Industrial.
- In terms of quantitative assessment, the proposed development will result in no changes to the site areas or GFA numbers that are being proposed under the WH8 Base Build Modifications. The changes contemplated under the WH8 Base Build Modifications are not significant as they would result in a quantitative change to the total GFA across the estate, less than 1%. As such, SSD-10448 MOD 10 does not result in any changes to GFA to the WH8 Base Build Modifications and represents a minor change to the estate wide GFA compared to the existing consent.
- The proposed development does not result in any changes to the overall number of lots, the internal road network layout and maintains the overall building / lot layout across Warehouse / Lot 8. The scale of built form will be unchanged from the WH8 Base Build Modifications and represents a minor change to that approved. The proposed carparking is to be located across areas that, under the WH8 Base Build Modifications, was previously mapped as hardstand and thus, does not represent a significant change to the overall lot design.
- The modified car parking represents the parking requirements for the proposed printing manufacturing, tenant operations. This is reflective of the greater parking requirements for an industrial use, compared to a warehouse and distribution centre. Overall, the proposed provision of parking will not result in any adverse traffic impacts (detailed in **Section 6.1** of this EIS) and thus, will not represent a significant change to the overall vehicular movements facilitated under the existing approvals. Additionally, the proposed parking areas will convert areas that have been approved for heavy-vehicle hardstand and thus, does not result in any adverse impacts to stormwater management and will deliver an improved outcome with regard to amenity and urban heat island mitigation, due to the provision of increased island tree plantings / landscaping.
- Whilst the warehouse specific dBA limit contained in Condition A16(a) of SSD-10448 is proposed to be increased, cumulatively the noise generated by all AIE operations will continue to meet the at-receiver noise limits as stipulated by Condition A16(b). So whilst this application seeks to increase the noise generation limit for Warehouse 8, the overall impact on sensitive receivers will be substantially the same and not increased from the approved maximum noise limits.
- With regard to a qualitative assessment, the modification application does not propose and change of use to the approved. The proposed printing manufacturing land use is proposed under the separate SSD-80331959. This land use, which is to be facilitated by this modification, aligns with the overall industrial and warehouse / logistics operations that have been approved across the estate under SSD-10448 in terms of providing employment opportunities with the approved state infrastructure. The modifications to the warehouse will not diminish or detract from the design quality, or compromise the design intent, of the development for which the development consent was granted.
- The hours of operation remain unchanged.
- The proposal as modified will continue to align with the aims and objectives of relevant State and local planning instruments and planning guidelines.
- The development as proposed to be modified will not give rise to more than a minimal environmental impact as detailed in **Section 6** of this EIS.

3.3. DESCRIPTION OF SSD-80331959 DEVELOPMENT

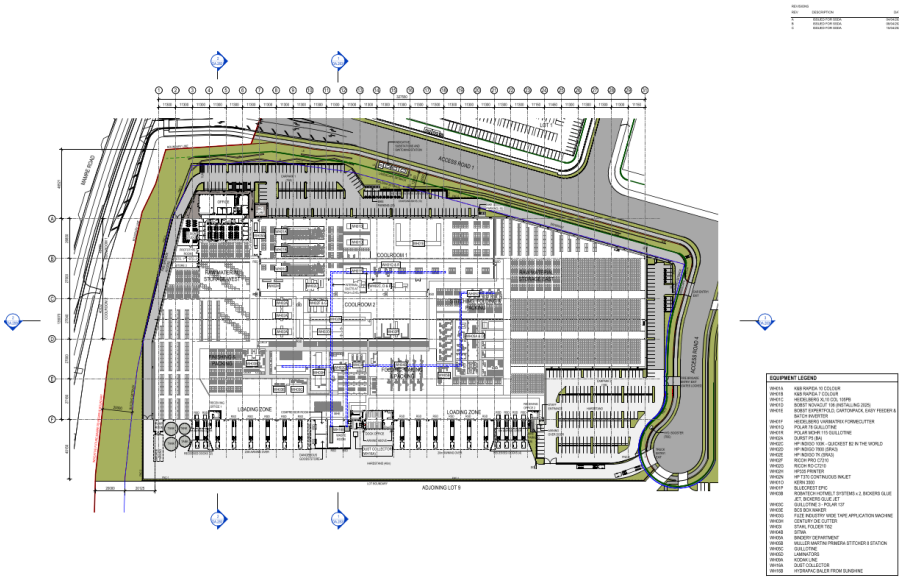
3.3.1. Parking and Proposed Fit Out

The proposed development seeks to deliver parking across Lot / Warehouse 8, consistent with the modifications detailed in **Section 3.2** above. The increase in carparking spaces is proposed to be facilitated through the conversion of hardstand and loading docks areas into light vehicle parking spaces. The proposed increase in parking is required to support the operational requirements and staffing numbers for the IVE Group operations as detailed in the sections below.

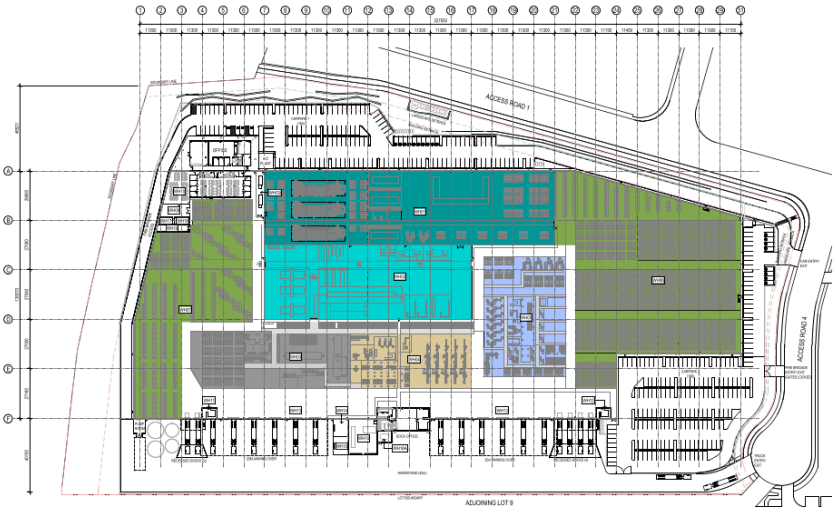
Additionally, the proposal seeks to facilitate the internal layout and fitout of Warehouse 8, in support of the proposed tenant operations. Details are shown on the Architectural Plans prepared by SBA, attached at **Appendix F,** shown in **Figure 14** below.

Detail of the use the different fitout areas are detailed in the sections below. A comprehensive list of the equipment proposed to be fitout within the different rooms of the Warehouse 8 building is provided at the attached IVE Equipment List (**Appendix AA**).

Figure 14 Proposed Warehouse 8 Fit-Out Plan



Picture 4 Proposed Fit-Out



Picture 5 Proposed Operational Layout Plan

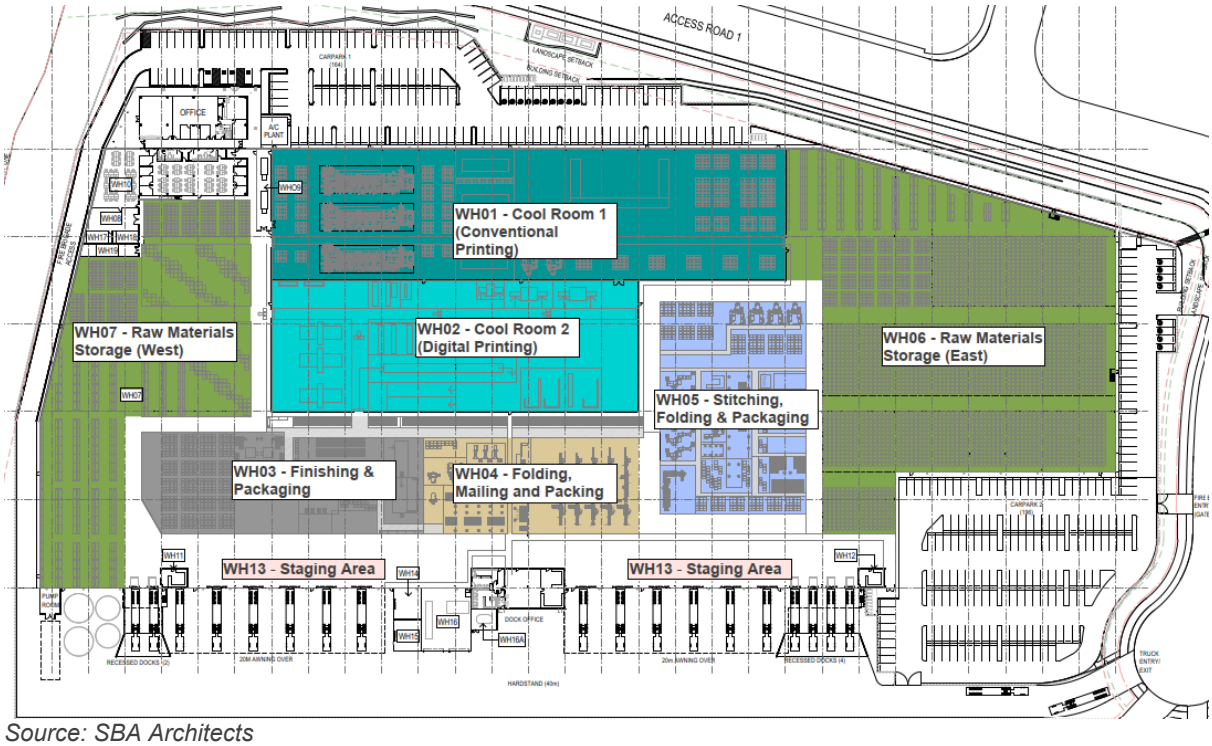
Source: SBA Architects

3.3.2. Proposed Printing / Manufacturing SSDA Operations

The proposed printing operations will constitute 24/7 “printing / manufacturing” activity as well as ancillary warehouse storage within the Warehouse 8 building / Lot 8..

Within the warehouse there are eight key zones, which are seen in Figure 15.

Figure 15 Plan of Key Operational Zones within Warehouse 8



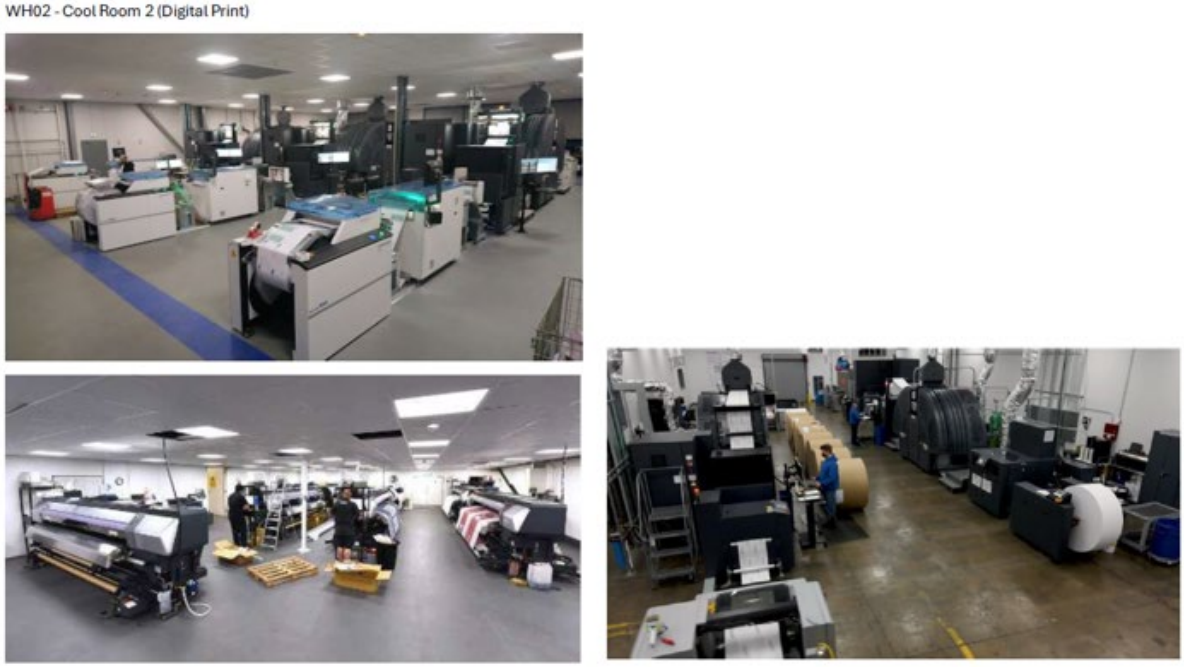
Source: SBA Architects

- **WH01 - Cool Room 1 (Conventional Printing)**: this area will be used for conventional printing (e.g. offset printing with prepared printing plates). The temperature of the room must be between 20-30 degrees Celsius to maintain machine operations. This space will require external chillers to support the temperature control and the printer operations. The key plant and equipment that will be used in this space include:
  - Conventional Printing Presses (e.g. K&B Rapida 10 color, Heidelberg XL10 col 105PB)
  - Cutting, stripping and blanking (e.g. BOBST Novacut 106)
  - Carton Glueing / Folding (e.g. BOST Expertfold, Cartonpack, Easy feeder and batch inverter)
  - Cutting Tables (e.g. Heidelberg Varimatrix formecutter, Kongsberg 2000x1700 Cutting Table
  - 3D Printer (e.g. Creality 3D Printer)
  - Color Production Printer (e.g. Ricoh 9210, Xerox Nuvera 314)
  - Poly and Paper Wrapping (e.g. Buhrs 300)
  - Envelope Processor (e.g. Kern 3500)
  - Polar Pile Turner (paper flipping, straightening, aligning, static removal)
  - Chillers

Figure 16 Photo Examples of Cool Room 1

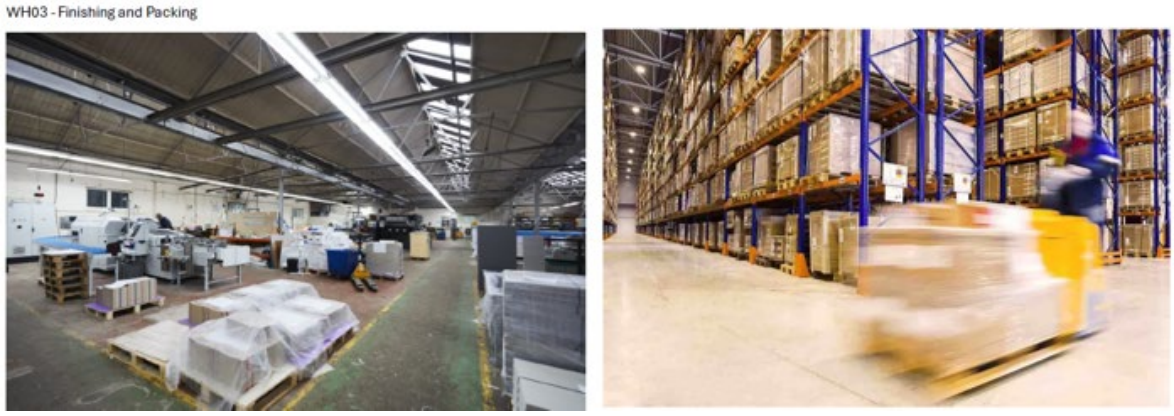
- **WH02 - Cool Room 2 (Digital Printing)**: this area will facilitate printing of digital-based imagery. The room is to be temperature controlled to maintain a consistent ambient temperature for the digital printing equipment, inks and quality of print outputs. The temperature of the room must be between 20-25 degrees celcius to maintain machinery operation. The key plant and equipment that will be used in this space include:
  - Large Scale Digital Printing (e.g. Durst PS)
  - Cutting Tables (e.g. Zund G3 3XL-3200 Cutting Table)
  - Digital Presses (e.g. HP Indigo 100k, HP Indigo 7800)
  - Color Production Printers (e.g. RICOH Pro C7210, HP335 Printer)
  - Chillers (e.g. HP 7800 Chiller)
  - Cutting Machines (e.g. Kongsberg Plotter/vac pump)

Figure 17 Photo Examples of Cool Room 2



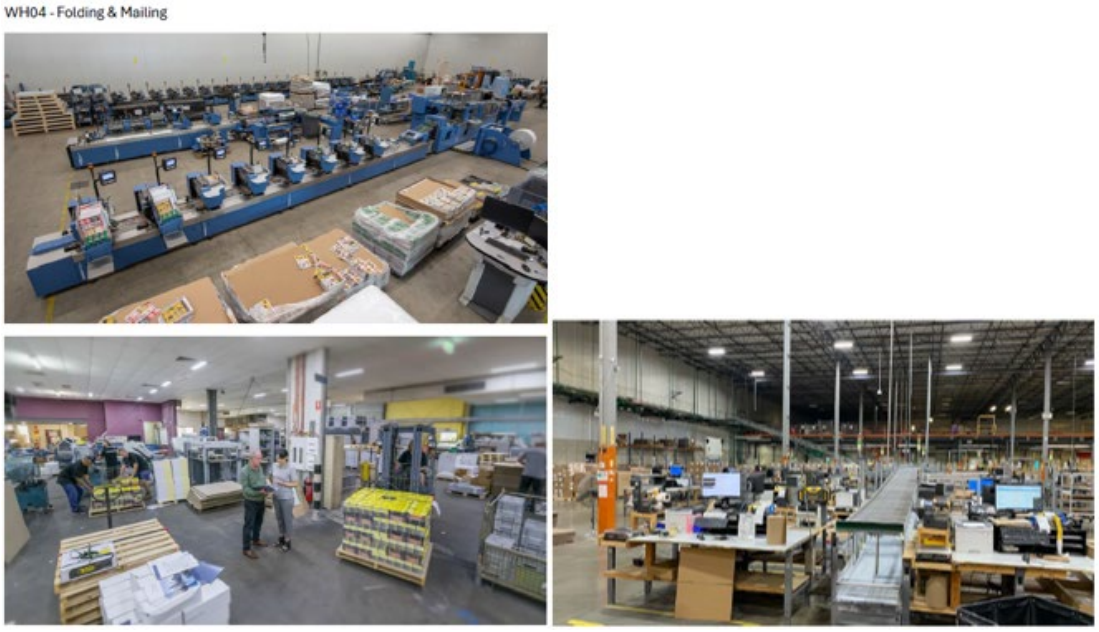
- **WH03 - Finishing & Packaging:** this area is used for processing and packaging of printed goods. The key equipment that will be used in this space include:
  - Printers (e.g. HP Latex 800W Printer)
  - Adhesive Glue Application Systems (e.g. Robatech Hotmelt Systems)
  - Cutters (e.g. Guillotine 3 – Polar 137)
  - Box Makers (e.g. BCS Box Maker)
  - Banding Machines (e.g. Akebono paper banding machines)
  - Adhesive Application Machines (e.g. FUZE Industry wide tape application machine)

Figure 18 Photo Examples of Finishing and Packing



- **WH04 - Folding, Mailing and Packing:** this area will be used for final processing and preparation of printed goods before being shipped to customers. The key equipment that will be used in this space include:
  - Folding Machines (e.g. Stahl Folder Ti52)
  - Cutting Machines (e.g. Polar 78 Guillotine)

Figure 19 Photo Examples of the Folding and Mailing



- **WH05 - Stitching, Folding & Packaging:** this area will be used for final processing and preparation of printed goods before being shipped to customers, including includes the relevant post-processing steps (e.g. laminating, coating) for the prints. The key equipment that will be used in this space include:
  - Laminator Machines (e.g. Lamia Backline)
  - Folding Machines (e.g. MBO K8 Combi Folding)
  - Sticher Stations (e.g. Muller Martini Primera Sticher 8 station)
  - Cutting Machines.
  - Polar Pile Turner
  - All associated computers and work benches.

  Figure 20 Photo Examples of Stitching, Folding and Pasting

- **WH06 - Raw Materials Storage (East):** this area will be used for goods storage once partially or completely finished and will feature racking for the storage of the relevant printing materials.
- **WH07 - Raw Materials Storage (West):** this area will be used for raw goods storage prior to being used and will feature racking for the storage of the relevant materials.
- **WH13 - Staging Area:** this area located adjacent to the loading docks will be used for the temporary holding of goods once received or prior to their dispatch from site.

These key zones form part of the two (2) operational workflows which are further detailed in **Section 3.3.2.1** & **3.3.3.2** below.

- **Workflow 1: Large Format Digital Printing**
- **Workflow 2: Conventional Printing**

The printing operations will be supported by ancillary office areas which will accommodate internal fit-out and amenities and fit-out typical for industrial/warehouse ancillary office areas. Overall, these operational workflows are forecast to have a processing capacity of 7,063.20 tonnes of finished (printed) products per year, however, it is noted that this quantity is subject to some variation depending on the contracts that year.

3.3.2.1. Workflow 1: Large Format Digital Printing

Digital printing provides improved precision, speed, and flexibility in printing. Unlike traditional offset printing, digital printing does not require the creation of printing plates and involves transferring digital files directly onto the printing substrate, whether paper, cardstock, or other materials.

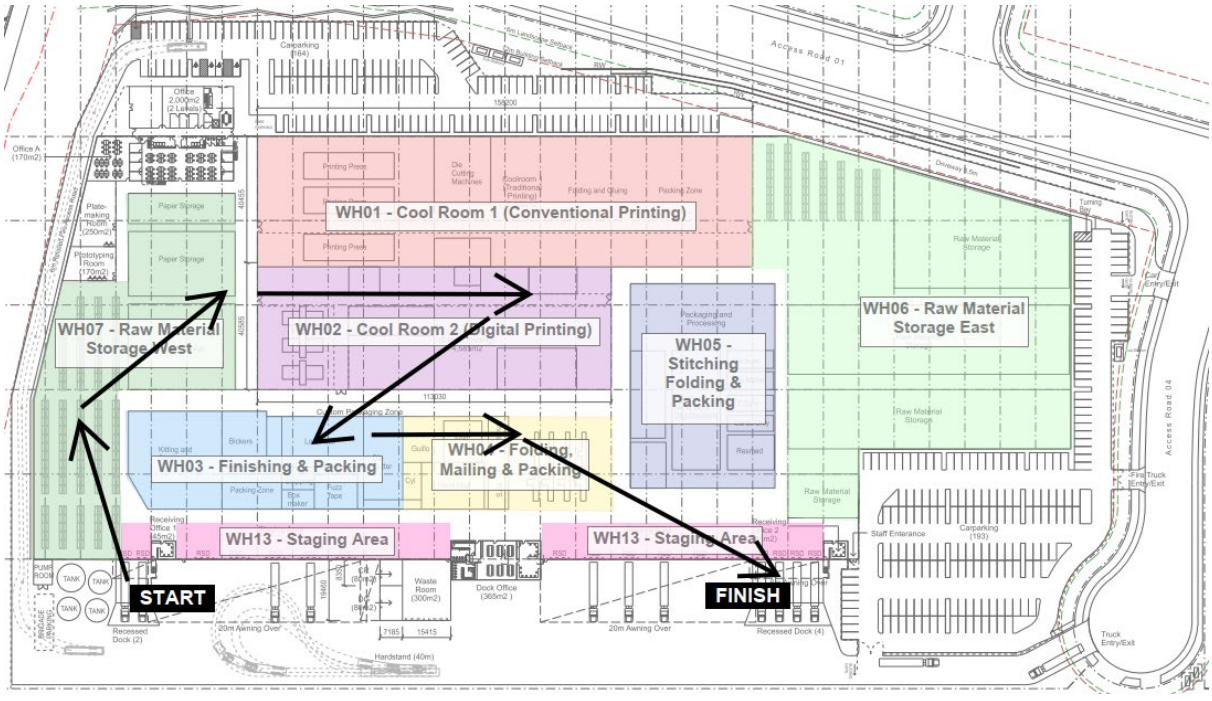
Ultimately, this makes the digital printing technology ideal for short print runs, variable data printing, and quick turnaround times. Such as;

- **Personalised Marketing Materials:** digital printers enable businesses to personalize each printed material, whether direct mail, brochures, or promotional items. Variable data printing allows for customization based on recipient demographics, preferences, or past interactions.
- **Short Run Printing:** for projects with low to medium print volumes, digital printing machines offer a cost-effective solution. This includes business cards, flyers, postcards, and small-scale marketing collateral.
- **Proofing & Prototyping:** a digital printer is invaluable for producing high-quality proofs and prototypes with minimal setup time. Designers and marketers can review print samples quickly before finalizing large-scale production.
- **On-Demand Printing:** with digital printing, businesses can print materials on demand, eliminating the need for excess inventory and reducing waste. This is particularly advantageous for items with frequent updates, such as manuals, catalogues, and training materials.

The workflow for conventional printing is summarized below and demonstrated in **Figure 21**.

1. WH13 - Staging (Acceptance & Dispatch).
2. WH07 - Raw Materials Storage.
3. WH02 - Cool Room 2 (Digital Printing).
4. WH03 - Finishing & Packaging.
5. WH04 - Folding, Mailing and Packing.
6. WH13 - Staging Area

Figure 21 Indicative Digital Printing Operational Workflow



Source: SBA Architects

3.3.2.2. Workflow 2: Conventional Printing

Conventional printing, also known as offset printing, is a traditional printing method that has proficiency in high-volume production. Conventional printing feeds larger sheets of paper (or other substrate) through a press for rapid printing of large quantities. Conventional printing typically requires longer setup times than digital printing but offers better efficiency and cost-effectiveness for long print runs.

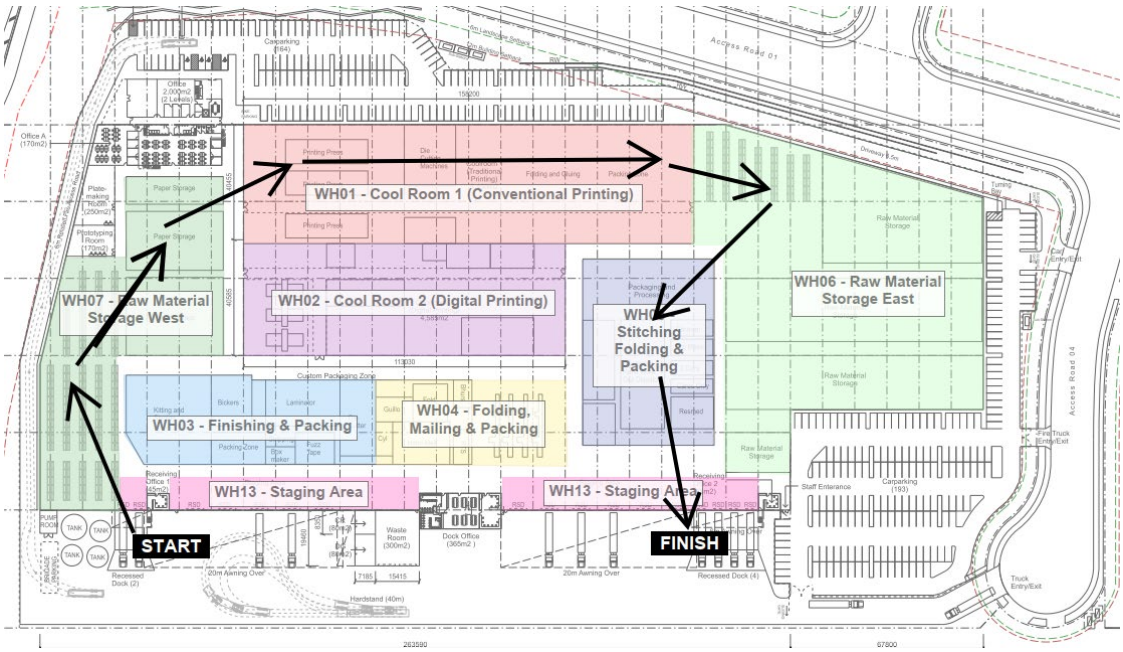
Examples of products typically printed through a conventional printing include;

- **Magazines**: conventional printing is the preferred choice for newspapers, magazines, and periodicals with large circulation numbers. Its high-speed capabilities and ability to handle various paper stocks make it ideal for the mass production of publications.
- **Catalogues and Direct Mailers:** businesses that produce catalogues, direct mailers, and promotional inserts benefit from the cost savings of offset printing for large-scale distribution. The consistent print quality and efficient production process ensure timely delivery to recipients.
- **Packaging and Labels**: offset printing is widely used for printing packaging materials, labels, and flexible packaging. Its ability to print on various substrates, including film and foil, makes it indispensable for the packaging industry.
- **Retail Inserts & Flyers**: retailers often rely on offset printing to produce weekly circulars, inserts, and flyers distributed in newspapers or via direct mail. The high-speed capabilities of offset presses ensure timely delivery of promotional materials to consumers.

The workflow for conventional printing is summarized below and demonstrated in **Figure 22**.

1. WH13 – Staging Area (Acceptance & Dispatch)
2. WH07 - Raw Material Storage (West)
3. WH01 - Cool Room 1 (Conventional Printing)
4. WH06 - Raw Materials Storage (East)
5. WH05 - Stitching, Folding & Packaging
6. WH13 - Staging Area.

Figure 22 Indicative Conventional Printing Operational Workflow



Source: SBA Architects

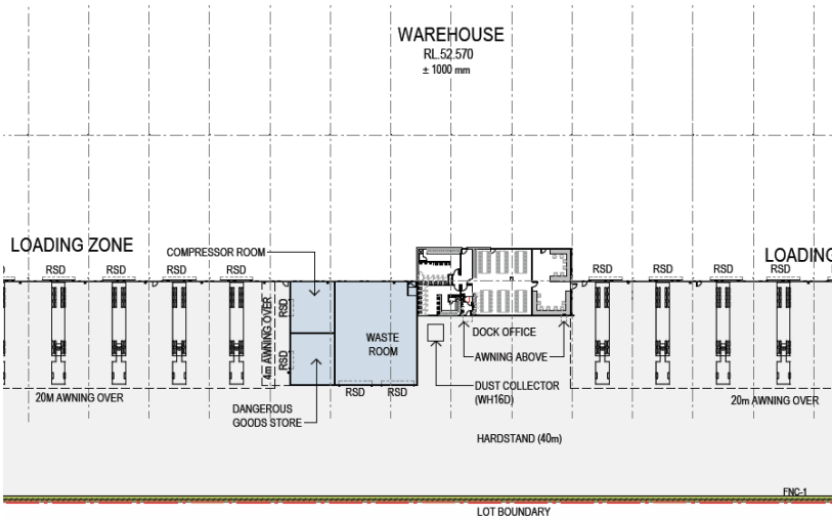
3.3.2.3. Waste and Compressor Room

In support of the proposed operations, a separated waste room and compressor room is proposed as well as a separate dangerous goods storage and separate control room. Details of the operational waste generation types and volumes are provided at the Waste Management Plan prepared by MRA (refer to **Appendix N** and **Section 6.5** of this EIS). The operational waste will be managed via a combination of mobile garbage bins, bulk bins, compactors/hook lift bins, drums, IBCs and compacted bales that have been utilised by IVE at other similar sites. These methods are tested and proven to be effective. An industrial waste storage room has been provided adjacent to the dock office of approximately 295m^2 in size next to the compressor room.

The compressor room will provide a reliable supply of compressed air in support of the printing operations. Printing presses will be supported through the appropriate infrastructure. In addition to chillers, both the digital and traditional printers will be supported by extraction chimneys. The chimneys extract the heat generated from electrical cabinets and UV dryers during the printing process and discharge to the atmosphere.

The waste storage and compressor rooms are located at the southern end of the Warehouse 8 building, demonstrated in the figure below.

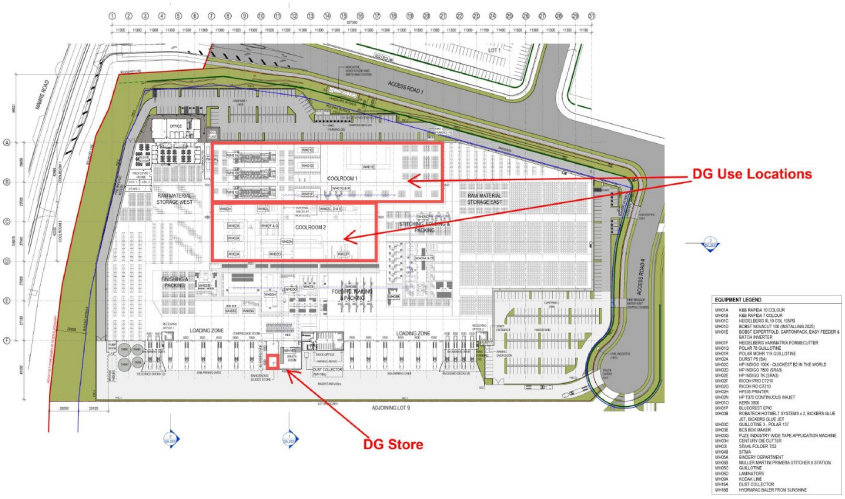
Figure 23 Waste Room and Compressor Room Location



Source: SBA Architects

The proposal will aggregate the DGs currently stored at sites in Granville, Homebush, and Silverwater. These DGs include Classes 2.1 (flammable gases, including Liquified Petroleum Gas (LPG)), 3 (flammable liquids), 8 (corrosive substances), and 9 (miscellaneous). The storage and use area for dangerous goods are shown in **Figure 24** below. The DG storage will not exceed SEPP (Resilience and Hazard) thresholds.

Figure 24 Dangerous Goods Storage and Use



Source: SBA Architects

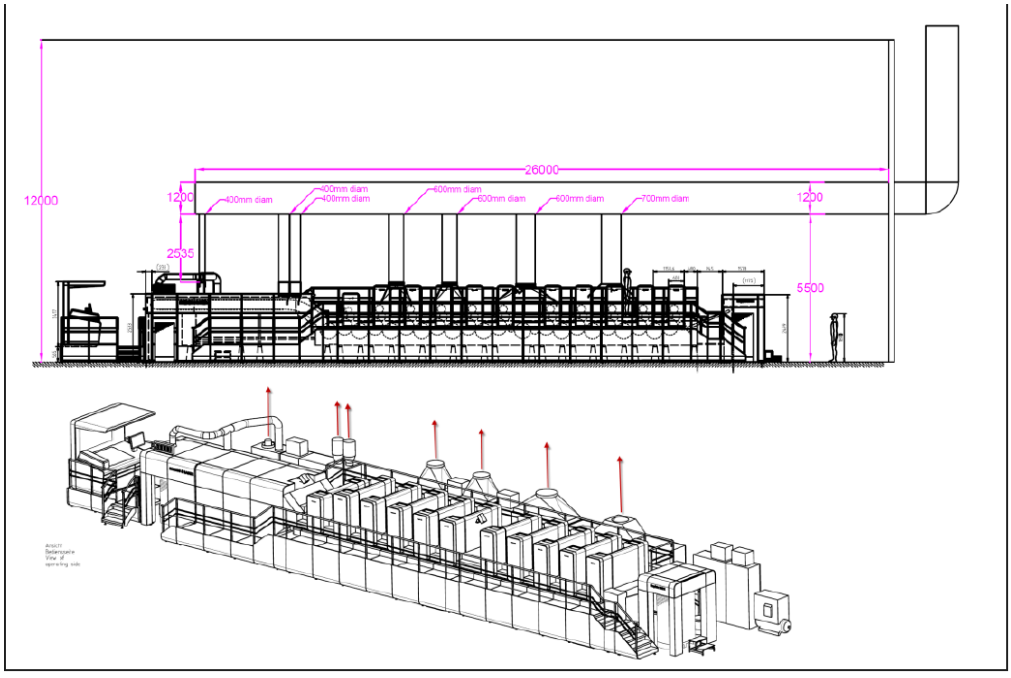
3.3.2.4. Cold Room Extraction System

The conventional printing process is proposed to be facilitated with two new Koening & Bauer Rapida RA106X printing presses. The proposed printing press requires an efficient extraction system at seven extraction points. Instead of installing seven individual extraction chimneys, a single duct header system with a 12 kW powered fan extraction unit has been designed. This system will penetrate either the roof or the wall, optimizing efficiency and reducing the number of required roof penetrations, and optimal dispersion of the discharged air. It is understood that RA106X will not be using any combustion processes and will be electrically powered therefore emissions from combustion processes are not anticipated.

The extraction system consists of multiple duct sections, bends, and a fan unit designed to handle the air extraction needs of the electrical cabinets. Below is a summary of the materials and components used in the system, and a schematic of the proposed ducted system connecting to the building roof shown in **Figure 25**.

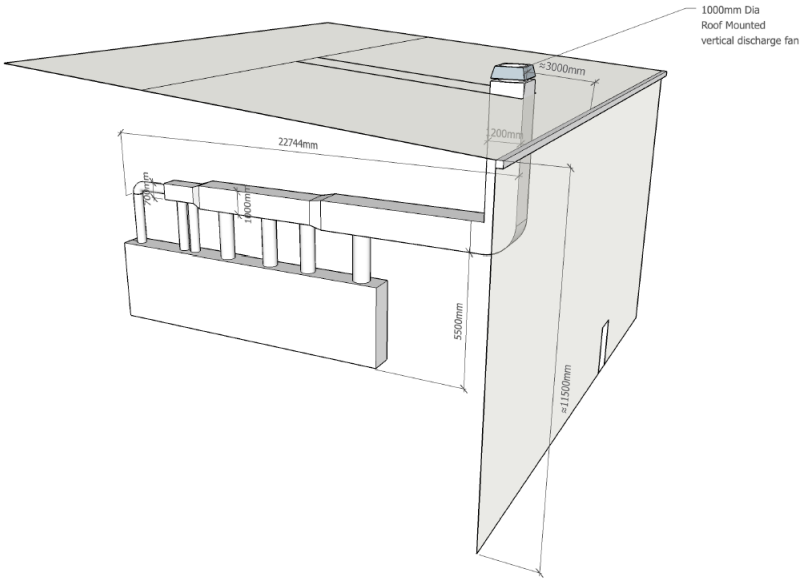
- Ducting Components:
  - 3 units of 400mm diameter ducting, each approximately 3m in length, complete with a 45-degree bend and a take-off piece for flat ductwork.
  - 3 units of 600mm diameter ducting (closest available size to 560mm diameter), each approximately 3m in length, complete with a 45-degree bend and a take-off piece for flat ductwork, along with a transitional piece to fit a 560mm diameter outlet.
  - 1 unit of 700mm diameter ducting (closest available size to 710mm diameter), approximately 3m in length, complete with a 45-degree bend and a take-off piece for flat ductwork, including a transitional piece to fit a 710mm diameter outlet.
- Square Ducting:
  - 22 lengths of 1,405mm L x 1,200mm x 1,200mm square ducting, totalling 26,695mm in horizontal length and 4,215mm in vertical length.
  - 1 square-to-round transition on the riser duct to fit the fan unit.
- Fan and Exhaust System:
  - 1 unit of 1,000mm diameter, 12.10 kW fan (13,000 L/s @ 350 Pa).
  - 1 vertical weatherproof discharge cowling.
  - 1 unit of 1,200mm x 1,200mm 90-degree bend.

Figure 25 Proposed Extraction System Stack Layout



These extraction chimneys will connect to external, roof-mounted vertical discharge fans. Refer to **Figure 26** which is an example of an extraction chimney at another warehouse. To maintain the temperature range for the printing equipment located within each of the respective cool rooms, fusion units will be installed on the roof above the respective cool rooms. Notwithstanding the low emissions anticipated from the proposed process, to optimize air quality management and streamline emissions control, it is proposed to direct all exhaust air through a single, consolidated exhaust system instead of multiple smaller outlets. The design is being developed to minimise the extent and impact of rooftop plant, including visual impact, whilst still meeting operational requirements.

Figure 26 Extraction Chimney



Source: Mirvac

3.3.2.5. Other Warehouse Ancillary Rooms

To support the 7 key operations zones identified above, there are several ancillary rooms located within the warehouse which are in support of the proposed tenant operations, are included at the Tenancy Site Plan prepared by SBA, attached at **Appendix F** and shown in **Figure 14** above.

- **WH08 – Prototype Room:** this room will be used for the creation of prototypes for clients new printing and packaging goods.
- **WH09 – Plate Making Room:** this room will be used to impress the printing text / images onto metal plates which are used in conventional printing process.
- **WH10 – Design Studio:** this room is used for the designers producing the prototypes and finished products.
- **WH11 – Receiving Office 1:** this room is used as an acceptance area of good received.
- **WH12 - Receiving Office 2:** this room is used as a dispatch area of good received.
- **WH14 – Compressor Room:** this room houses the compressors required for IVE's printing function.
- **WH15 – Dangerous Goods Room:** this room houses IVE's DG's.
- **WH16 – Waste Room:** this room houses the physical waste which is produced in IVE's operations, including compactors, bailers, shredders along with standard waste bins.
- **WH17 – Proto Secure:** this room is used for storing prototypes, which is required to be secured.
- **WH18 – Trans Urban Secure:** this room is used to package Trans Urban chips (E-Tags) to customers.
- **WH19 – SBA Cards:** this room is used to package bank credit cards to customers.

3.3.2.6. Materials

Materials to be stored across the site include the following:

- Paper - Sheets | Pallets
- Paper - Reels | Reels bulk
- Synthetic – Sheets | Pallets/Oversize Pallets
- Synthetic - Reels | Reels on pallets/Oversize Pallets
- Envelopes – Cartons on pallets
- Inks - Sheetfed | Drums/tins/canisters on pallets
- Inks – Digital | Drums/bottles in cartons on pallets
  - It is proposed that HP A50 Inks and A50 Bonding Agent will be utilised. The inks will be used:
    - Approximately 24,573 kg of inks per year
    - Approximately maximum 120 kg of inks per day
    - For 24 hours per day, and 7 days per week
- Consumables - Warehouse | Cartons/bottles on pallets
- Consumables - Digital | Cartons/bottles on pallets
- Consumables - Sheetfed | Cartons/bottles on pallets
- Dangerous goods – Drums/Bottles on pallets/IBC's
- Plastic wrap – Rolls on pallets

Table 14 Volume of Materials to be Stored On-Site

Material	Stored On / In	Volume	Volume Weight (Tonnes)	Volume Weight (Litres)
Paper – Sheets	Pallets	2,694	1,371	
Paper – Reels	Reels Bulk	7,800	10.300	
Synthetic – Sheets	Pallets/Oversized Pallets	89	24	
Synthetic – Reels	Reels on Pallets / Oversized Pallets	53	9	
Envelopes	Cartons on Pallets	1,510	750	
Inks – Sheetfed	Drums/Tins/Canisters on Pallets	1,475	5	300
Inks – Digital	Drums/Bottles in Cartons on Pallets	270	0.45	5,104
Consumables – Warehouse	Cartons/Bottles on Pallets	681	6	
Consumables – Digital	Cartons/Bottles on Pallets	230	1	
Consumables – Sheetfed	Cartons/Bottles on Pallets	483	3	164
Dangerous Goods	Drums/Bottles on Pallets/IBS’s	38		10,806

Material	Stored On / In	Volume	Volume Weight (Tonnes)	Volume Weight (Litres)
Plastic Wrap	Rolls on Pallets	72	54	
TOTAL		15,395	12,524	16.374

As noted in the beginning of **Section 3.3.2** above, the proposed operational workflows are forecast to process these volumes of materials for an output of 7,063.20 tonnes of finished (printed) products per year.

3.4. VEHICULAR MOVEMENTS

The anticipated operational staff and vehicle movements are summarised in the tables below.

Business Units	Numbers	Hours
1st Day	125	6am – 2pm
2nd Day	40	7am – 3pm
Afternoon	79	2pm – 10pm
Night	20	10pm – 6am
Office	151	8am – 5pm
Total	**415**	

Heavy Vehicles	Per Day	Per Week	5am-8am	8am-11am	11am-2pm	2pm-5pm	5pm-8pm	8pm-11pm
Rigid Truck	34	170	11	17	17	11	2	0
Semi Trailer	43	215	4	5	2	1	1	0
B-double	2.2	11	0	2	1	0	0	0
Hook bin	7	37	5	1.4	0	0	0	1
Container	1.2	7	4	1.2	1	0	0	0
Courier van/ute	36	180	5	7	9	6	0	0
Total vehicles	**124**	**620**	**29**	**33.6**	**29**	**18**	**3**	**1**

3.5. AIR QUALITY, WASTE AND ENVIRONMENTAL MANAGEMENT

IVE prides itself on outstanding environmental management credentials which include ISO 14001 Environment Certification, which is an international standard for organizations to manage their environmental impact, including air quality. IVE's resource consumption is limited to paper, cardboard, electricity, water, liquid chemicals, and oils. The waste (which will be detailed in the Waste Management Plan) from IVE's printing process is controlled and processed as follows-

- Paper- all wastepaper is 100% recycled
- Cardboard - all cardboard is 100% recycled

- Electricity - heat generated from electrical cabinets and UV dryers is discharged to atmosphere, inks are mostly water-based, and do not include any significant VOC content, and therefore are exempted from any licensing requirements. This is further addressed in the AQIA.
- Water - containerised and removed by Licenced waste disposal company
- Liquid consumables- containerised and removed by Licenced waste disposal company
- Chemicals and oils- containerised and removed by Licenced waste disposal company

Additionally, IVE group has the following quality accreditations, which are held across all facilities nationally;

- ISO 9001;
- ISO 14001;
- FSC; and
- PEFC.

In addition to the above, IVE also have accreditation in support for any food packaging within the proposed Cool Room 1 as to ensure the required level of quality and compliance:

- FSSC22000; and
- HACCP.

With IVE's proposed operations within Warehouse 8 consisting of digital and conventional printing workflows, both these manufacturing processes are proposed to be considered "clean" printing operations from an air quality perspective. The Air Quality Impact Assessment (AQIA) prepared by SLR confirms that VOC emissions from the proposed processes are minimal during even a worst-case scenario of the proposal (constituting only 0.01%-0.04% of the Penrith LGA total VOC emissions) noting that IVE will be using low-VOC inks, proper solvent management and the appropriate filtration technologies. The flues on the roof of the warehouse associated with the printing equipment will disperse the hot air generated by the equipment. Any particles will be filtered or extracted while the hot air is exhausted. This is further expanded in the Air Quality Section of the EIS at **Section 6.3** and the AQIA at **Appendix L**.

4. STATUTORY CONTEXT

This section of the report provides an overview of the key statutory requirements relevant to the site and the project as proposed to be modified. It identifies the key statutory matters which are addressed in detail within **Section 6**, including the power to grant consent, permissibility, other approvals, pre-conditions and mandatory considerations.

4.1. STATUTORY REQUIREMENTS

Table 15 categorises and summarises the relevant requirements in accordance with the DPHI *State Significant Development Guidelines (March 2024).*

Table 15 Identification of Statutory Requirements for the Project

Statutory Relevance	Action
SSD-10448 MOD 10	
Declaration of SSD	In accordance with Schedule 1 of the Planning Systems SEPP, development that has an Estimated Development Cost (**EDC**) of more than $50 million for the purpose of warehouses or distribution centres are classified as SSD. The proposed modification to the approval of SSD-10448 will remain consistent with this SEPP and is appropriately characterised as SSD. The proposed modification is considered as 'substantially the same development' as the development for which consent was originally granted' so would meet the requirements of S4.55(2) of the EP&A Act.
Permissibility	The site is majority zoned IN1 in accordance with the Industry and Employment SEPP, where 'light industry' is permissible with consent in the IN1 Zone. The proposed modification will support a separate change of use SSDA for the building, to industrial purposes (manufacturing / printing). This use is approved for the site by way of SSD-10448.
SSD-80331959	
Declaration of SSD	In accordance with Clause 1 of Schedule 1 to the State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP), development that has a EDC of more than $30 million for the purpose of '*printing,*' is classified as SSD: *11 Other manufacturing industries* *(1) Development that has an estimated development cost of more than $30 million for any of the following purposes—* *(c) printing or publishing,* *(2) Subsection (1)(b)–(f) does not apply to development on land within the area of the City of Sydney.* The EDC for the proposed printing is estimated to be $53,538,163. Accordingly, the proposal is classified as SSDA.
Permissibility	The site is zoned IN1 General Industrial. The proposed '*printing,*' as a form of light industry is a permissible form of development within the IN1 zone.
Other Approvals	
Commonwealth Environment Protection and Biodiversity Conservation	SSD-10448 was accompanied by a Biodiversity Development Assessment Report (BDAR) in accordance with the NSW Framework and in consultation with NRAR. A habitat assessment was undertaken and identified the Latham's Snip and Grey-headed Flying-fox as 'matters of national environmental significance'. The BDAR concluded that the development under SSD-10448 will not have impact on either species.

Statutory Relevance	Action
*(**EPBC**) Act 1999*	Development on Lot 8 remains within the extent of building works approved by SSD-10448 and thus does not change the impact to the potential habitats across the subject site. Accordingly, it will not result in any impacts on the relevant species and maintains compliance with the EPBC Act. The modified development under SSD-10448 MOD 9 and SSD-60513208 MOD 2 remains within the extent of building works approved by SSD-10448 and thus does not change the impact to the potential habitats across the subject site. Accordingly, it will not result in any impacts on the relevant species and maintains compliance with the EPBC Act.
Protection of the Environment Operations Act 1997 (**POEO Act).**	The proposal does not trigger a scheduled activity under the POEO Act. The quantities of Dangerous Goods (DGs) to be stored and handled, including flammable gases and liquids, do not exceed the threshold quantities outlined in the "Applying SEPP 33 – Hazardous and Offensive Development" guidelines. Therefore, no additional EPA licensing or approvals are required for this development as per the Dangerous Goods Assessment prepared by Riskon (refer to **Appendix O**) and with regard to waste generated, refer to the Waste Management Plan (**Appendix N**). This includes: ▪ Clause 9 | Chemical Storage: Clause 9 pertains to the storage of chemicals, including general chemicals storage. The thresholds for requiring a licence are: – More than 20 tonnes of pressurised gases – More than 200 tonnes of liquified gases – More than 2,000 tonnes of chemicals in any other form As per the Dangerous Goods Assessment, the quantities of dangerous goods are significantly below these thresholds. The total quantity of flammable gases to be stored is 65kg, liquified petroleum gas (LPG) to be stored is 285 kg, and the total quantity of flammable liquids is 5,540 litres. ▪ Clause 32 | Printing, Packaging, and Visual Communications Waste Generation: Clause 32 relates to the generation of waste from printing, packaging, and visual communications activities. A licence is required if the facility has on site at any time more than 5 tonnes of prescribed waste, which includes hazardous waste, restricted solid waste, or liquid waste (where 1,000 litres of liquid is taken to weigh 1 tonne). Refer to the Waste Management Plan (**Appendix N**).

4.2. PRE-CONDITIONS

The relevant pre-conditions to exercising the power to grant approval were outlined in the EIS for the original SSDA. The pre-conditions which are relevant to the project as modified and the section where these matters are addressed within the report are summarised in **Table 16**.

Table 16 Pre-conditions

Statutory Reference	Pre-Condition	Consistency with Approved Development	Section in Report
Environmental Planning and Assessment Act 1979			
Section 4.24 Status of concept development applications and consents	While any consent granted on the determination of a concept development application for a site remains in force, the determination of any further development application in respect of the site cannot be inconsistent with the consent for the concept proposals for the development of the site.	Concept development consent SSD-10448 applies to the site. The proposal has been prepared so that the SSD-10448 MOD 10 and proposed SSD-80331959 remains consistent with the Concept development consent. The proposal will maintain consistency with the future stage conditions of consent for SSD-10448. This is addressed in **Appendix C**.	**Appendix C**
Environmental Planning & Assessment Regulation 2021			

Statutory Reference	Pre-Condition	Consistency with Approved Development	Section in Report
Section 66 Contributions plans for certain areas in Sydney – the Act, s 4.16(1)	Pursuant to section 4.16(1) of the Act, a development application in relation to any land zoned IN1 General Industrial under State Environmental Planning Policy (Industry and Employment) 2021 must not be determined by the consent authority unless a contributions plan has been approved for the land to which the application relates.	The *Mamre Road Precinct Contributions Plan 2022* was adopted by Penrith City Council and came into force over the land on 4 April 2022. As such, this requirement has been satisfied.	N/A
State Environmental Planning Policy (Industry and Employment) 2021 (**I&E SEPP**)			
2.17 Requirement for development control plans	The consent authority must not grant consent to development on any land to which this Chapter applies unless a development control plan has been prepared for that land.	*The Mamre Road Precinct DCP* was adopted in November 2021 which applies to the land. This requirement has been satisfied.	N/A
2.19 Ecologically Sustainable Development	The consent authority must not grant consent to development on land to which this Chapter applies unless it is satisfied that the development contains measures designed to minimise— (a) the consumption of potable water, and (b) greenhouse gas emissions.	An ESD report has been prepared (**Appendix S**) which identifies the relevant energy and water efficiency systems that will be implemented as part of the development.	**Appendix S**
2.20 Height of buildings	The consent authority must not grant consent to development on land to which this Chapter applies unless it is satisfied that— (a) building heights will not adversely impact on the amenity of adjacent residential areas, and (b) site topography has been taken into consideration.	The proposed Warehouse 8 construction has been approved to a building height of 13.7m. No changes are proposed to the built form for Warehouse 8 compared to that sought under the base build modifications. The character and scale of the development as proposed is in keeping with the site's evolving and expected future context.	**N/A**
2.21 Rainwater harvesting	The consent authority must not grant consent to development on land to which this Chapter applies unless it is satisfied that adequate arrangements will be made to connect the roof areas of buildings to such rainwater harvesting scheme (if any) as may be approved by the Secretary.	Rainwater management has been approved as part of the base Warehouse 8 consent. This is not proposed to change with the change of use.	**Section 6.4**
2.24 Public utility infrastructure	The consent authority must not grant consent to development on land to which this Chapter applies unless it is satisfied that any public utility infrastructure that is essential for the proposed development is available or that adequate arrangements have been made to make that infrastructure available when required.	All necessary public utility infrastructure and services are being provided to the site in accordance with the approved SSD-10448, Stage 1 development. The Warehouse 8 development was approved with the understanding that the relevant public utility infrastructure can support the proposed can support the intended development.	**Section 6.8**

Statutory Reference	Pre-Condition	Consistency with Approved Development	Section in Report
Clause 2.28 - Industrial Release Area	Despite any other provision of this Policy, the consent authority must not consent to development on land to which this clause applies unless the Director-General has certified in writing to the consent authority that satisfactory arrangements have been made to contribute to the provision of regional transport infrastructure and services (including the Erskine Park Link Road Network) in relation to the land to which this Policy applies	DPHI has advised Mirvac that, as the Aerotropolis SIC has been determined, a satisfactory arrangement certificate no longer needs to be issued. Satisfactory arrangements were confirmed prior to the issuance of consent for SSD-10448. No change is proposed that would affect delivery of infrastructure in accordance with those arrangements.	N/A
Clause 2.34 Development of land within or adjacent to transport investigation area	Consent must not be granted to development in the area marked "Transport Investigation Areas A and B" on the Land Zoning Map that has a capital investment value of more than $200,000 without the concurrence of Transport for NSW.	Lot 8 within AIE is not located on or adjacent to Transport Investigation Areas A and B.	N/A
Clause 2.35 Development within the Mamre Road Precinct	Consent must not be granted to development on the land identified on the Land Application Map as Precinct 12 (Mamre Road) that has a capital investment value of more than $200,000 without the concurrence of Transport for NSW.	N/A	N/A
3.6 Granting of consent to signage	A consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied— (a) that the signage is consistent with the objectives of this Chapter as set out in section 3.1(1)(a), and (b) that the signage the subject of the application satisfies the assessment criteria specified in Schedule 5.	No changes to the approved signage are proposed.	N/A
State Environmental Planning Policy (Resilience and Hazards) 2021 (**R&H SEPP**)			
Clause 4.6 Contamination and remediation to be considered in determining development application	Chapter 4 of the R&H SEPP requires that a site must be suitably remediated for the intended purpose prior to the grant of consent for that purpose.	SSD-10448 approved a Remediation Action Plan for the AIE. Remediation of the site in accordance with the RAP will ensure that the site will be made suitable for the approved commercial and industrial uses. No works are proposed as part of this current SSDA that would be inconsistent with the findings of the RAP or would change the approach to site remediation Subject to compliance with the RAP recommendations, the site will be made suitable for the intended purpose.	N/A
State Environmental Planning Policy (Transport and Infrastructure) 2021 (**T&I SEPP**)			
2.121 Traffic generating development	Schedule 3 of the Transport and Infrastructure SEPP identifies 'traffic generating development'	The proposal will not change the GFA of the Warehouse 8 building that is being sought to be established under the Separate	**Section 6.1**

Statutory Reference	Pre-Condition	Consistency with Approved Development	Section in Report
	which must be referred to Transport for NSW for concurrence. The schedule includes development for the purposes of industry incorporating 20,000sqm or more of gross floor area (GFA).	modification applications being prepared to SSD-10448 and SSD-60513208 which seeks to modify the Warehouse / Lot 8 building design and layout. Warehouse 8 as proposed to be modified will feature a total GFA in excess of 20,000m^2. Referral to Transport for NSW will be required. An assessment of the parking and traffic impacts are provided at **Section 6.1**.	
State Environmental Planning Policy (Sustainable Buildings) 2022 (**Sustainable Buildings SEPP**)			
3.2 Development consent for non-residential development	In deciding whether to grant development consent to non-residential development, the consent authority must consider whether the development is designed to enable sustainable development.	The proposal has been prepared with an updated embodied emissions materials form at **Appendix R** and responds to the sustainable design measures requirements as detailed in the ESD Report at **Appendix S**.	**Appendix R** **Appendix S**
State Environmental Planning Policy (Western Parkland City) 2021 (**WPC SEPP**)			
Clause 4.17 - Development controls— Airport safeguards	Development consent must not be granted to noise sensitive development if the development is to be located on land that is in an ANEF or ANEC contour of 20 or greater.	The AIE is located within the ANEC 20-25 Contour. The modified development does not include any noise sensitive uses.	N/A
Clause 4.19 Wildlife hazards	Development consent must not be granted to relevant development on land in a buffer area where wildlife may present a risk to the operation of the Airport without consideration of wildlife hazard risk.	The AIE lies within an 8km wildlife buffer zone. The proposed modification applications will not increase risk of wildlife strikes associated with Airport operations compared to the approved SSDAs.	N/A
Clause 4.22 Airspace operations	Development consent must not be granted to development to which this clause applies unless the development will not penetrate the prescribed airspace.	The AIE is located within the 180 – 210m AHD OLS. The built form of the warehouse building as proposed to be modified will be well below the OLS.	N/A

4.3. MANDATORY CONSIDERATIONS

Table 17 outlines the relevant mandatory considerations to exercising the power to grant approval which were considered in the original SSDA.

Table 17 Mandatory Considerations

Statutory Reference	Mandatory Consideration	Section in Modification Report
Consideration under the Act and EP&A Regulation		

Statutory Reference	Mandatory Consideration	Section in Modification Report
Section 1.3	Relevant objects of the Act	**Appendix C**
Section 4.15 (1)(a)(i) Relevant environmental planning instrument	Relevant environmental planning instruments: ▪ Planning Systems SEPP ▪ R&H SEPP ▪ I&E SEPP ▪ Sustainable Buildings SEPP ▪ WPC SEPP	**Appendix C**
Section 4.15 (1)(a)(ii) Relevant draft environmental planning instrument	No draft EPIs are applicable	N/A
Section 4.15 (1)(a)(iii) Relevant development control plan	*Mamre Road Precinct Development Control Plan 2021* (**MRP DCP**). Section 2.10 of the Planning Systems SEPP states that development control plans (whether made before or after the commencement of this Policy) do not apply to SSD. As such, there is no requirement for assessment of the proposal against the MRP DCP for the proposed SSD modification applications. Notwithstanding this, consideration has been given to the provisions relevant to the limited extent of the proposed modification:	**Appendix C**
Section 4.15 (1)(a)(iiia) any planning agreement or draft planning agreement	An SVPA has been negotiated, agreed and executed by the Applicant with public exhibition concluding in December 2021 to enable a satisfactory arrangement certificate (SAC) to be issued. An LVPA has been executed between Mirvac Projects Pty Ltd, Mirvac Industrial Developments Pty Ltd, Mirvac Funds Management Limited (as trustee for the Mirvac Kemps Creek Trust) and Penrith City Council.	N/A
Section 4.15 (1)(a)(iv) relevant matters prescribed by the EP&A Regulation	Clause 66 of the EP&A Regulation, relates to contributions for certain areas of Sydney, is applicable to this development and is addressed in **Section 4.2** of this EIS.	**Section 4.2**
Section 4.15(1)(b) the likely impacts of that development,	The likely impacts of the development have been identified in **Section 6** of the EIS.	**Section 6**
Section 4.15(1)(c)	The suitability of the Site for the development. An assessment of the suitability of the Site is undertaken in **Section 7.6** of this Report.	**Section 7.6**
Section 4.15(1)(d)	Any submissions made in accordance with the Act or the EP&A Regulation. Early engagement with the agencies has been undertaken as set out in **Section 5** of this Modification Report.	**Section 5**
Section 4.15(1)(2)	The public interest of the project is addressed in **Section 7.7** of this Report. Given the alignment of the project with Federal, State and local strategic policy it is considered that the project is in the public interest.	**Section 7.7**
Section 4.55	The proposed development is substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified.	**Section 3.2.3**
Consideration under the EP&A Regulation 2021		
Section 35	Assessment of consistency of development within the Mamre Road Precinct with Chapter 2 of SEPP (Industry and Employment).	**Appendix C**

Statutory Reference	Mandatory Consideration	Section in Modification Report
Considerations under other legislation		
Biodiversity Conservation Act 2016	The proposed modification will not result in any changes to the outcomes and findings of the BDAR in support of the original SSD-10448. The proposed modification will not result in any changes to any endangered native plant communities as per the original approval. Under Section 7.17, subsection (c) of the Biodiversity Conservation Act 2016 (7.17 Modifications of planning approvals or activities) the requirement for a biodiversity development assessment report in support of a for the modification of a development consent is not required if: *(i) the authority or person determining the application for modification, or determining the environmental assessment requirements for the application, is satisfied that the modification will not increase the impact on biodiversity values, or* *(ii) the application would, if it were an application for a development consent for the proposed modified development, be exempt from the requirement to be accompanied by a biodiversity development assessment report under an order made under section 7.7(3),* A BDAR Waiver is sought as part of the new SSDA (SSD-80331959) and a BDAR Waiver Request is attached at **Appendix W**	**Appendix W**
National Parks and Wildlife Act	The proposed modification will not result in any changes to the outcomes and findings of the Aboriginal Cultural Heritage Assessment (**ACHA**) prepared in support of the original SSDA.	N/A

5. ENGAGEMENT

The below outlines the engagement activities that have already been carried out for the project, including preliminary community views, and the engagement activities that have been undertaken during the preparation of the Modification Report. The below activities were undertaken having regard to the community participation objectives in the 'Undertaking Engagement Guidelines for State Significant Projects' prepared by DPHI and dated October 2022.

Community (surrounding local landowners, businesses, residents and stakeholders) engagement carried out during preparation of the EIS

Community engagement has previously been undertaken by Mirvac in the preparation of SSD-10448. No significant feedback was received to the original SSD-10448 and no community feedback has been received in respect to the subsequent MOD or staged SSD applications including for SSD-60513208.

In preparation of this proposal, a notification letter was issued to the following community stakeholders, issued on 9 April 2025 to the following stakeholders:

- Surrounding landowners and occupiers, including land-owners at:
  - Marme Road
  - Bordered by Buda Way, Giba Drive, Bakers Lane and Wubin Lane
  - Bordered by Emporium Avenue, Compass Drive and Sepia Road
  - Darrabarra Ave
  - Aldington Road
- Mamre Anglican School
- Emmaus Catholic College
- Emmaus Retirement Village
- Community groups:
  - Penrith Chamber of Commerce

Government and Agencies

Mirvac has been in ongoing consultation with DPHI, Penrith Council, TfNSW, utilities providers and other agencies throughout the preparation and assessment period for SSD-10448 and subsequent modifications. Email correspondence was issued to DPHI prior to the lodgment of these modification reports (dated 14.11.2024 and 19.11.2024) providing a summary of the proposed modifications in conjunction with the intended base build modifications. Additionally, email correspondence with DPHI was issued in 15.04.2025 on the acoustic assessment requirements. Request for feedback was also issued to the following government authorities:

- Department of Climate Change, Energy, Environment and Water.
- Penrith City Council.
- Parliament:
  - Member for McMahon, Hon Chris Bowen MP
  - Member for Badgerys Creek, Tanya Davies MP
- Transport for NSW
- Sydney Water
- Fire and Rescue NSW

Ongoing discussions will continue throughout the assessment phase of this application.

6. ASSESSMENT OF IMPACTS

This section provides a comprehensive summary of the updated technical studies undertaken to assess the potential impacts of the proposed modifications and the updated mitigation, minimisation and management measures recommended to avoid unacceptable impacts.

The detailed technical reports and plans prepared by specialists and appended to the Modification Report are individually referenced within the following sections. A summary of the updated mitigation measures is provided as **Appendix B**.

6.1. TRAFFIC AND TRANSPORT

A transport assessment has been prepared by Ason (**Appendix J**) which provides an assessment of the proposal.

6.1.1. Parking

Parking provision across the AIE considered the MRP which provides the following rates:

- Warehouse – 1 space per 300m^2
- Industrial – 1 space per 200m^2
- Office – 1 space per 40m^2

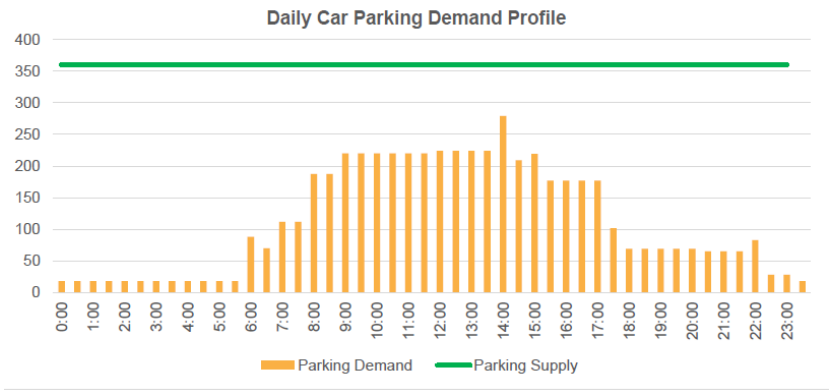
The proposal seeks to facilitate printing / manufacturing land use within the Warehouse 8 building. This will consist of 21,626m^2 of GFA dedicated to printing and manufacturing operations, whilst 18,540m^2 of the building will be used for the purposes of storage / warehouse and 2,464m^2 will be used for ancillary office space. As such, subject to the DCP rates, a minimum of 232 on-site parking spaces is required.

The proposal seeks to provide 360 car parking spaces which complies with the DCP's minimum rates. Further to the DCP rates, IVE Group's printing / manufacturing operational requirements are unique and differ to generic warehouse and industrial operations. IVE Group have provided a detailed breakdown of staff numbers and shift times which inform the daily car parking demand (see **Figure 27** below).

Figure 27 IVE Group Staff Numbers & Shift Times

TABLE 2: IVE GROUP STAFF NUMBERS AND SHIFT TIMES

Shift type	Shift time	Staff numbers	Associated vehicles
1st day shift	6am-2pm	77	70
2nd day shift	7am-3pm	46	42
1st afternoon shift	2pm-10pm	61	55
2nd afternoon shift	3pm-11pm	11	10
Partial afternoon shift	12pm-8pm	4	4
Night shift	10pm-6am	20	18
Office	8am-5pm	151	108
Total		370	307



The 307 associated vehicles relate to the quantum of vehicles generated by the 370 staff. With consideration of the above, the peak parking demand is expected to occur at 2pm with a demand of 280 spaces. This equates to a daily average demand of about 80 per cent of the proposed supply of 360 spaces and would appropriately accommodate IVE Group requirements. This also allows flexibility with respect to changes to office staff work from home arrangements, major meetings and events, visitor demands and small deliveries. For example, should work from home arrangements reduce from the current IVE Group estimated 30 per cent down to 10 per cent, then the maximum parking demand could increase to 310 vehicles. When this coincides with high visitor demand periods (estimated at maximum 20-30 visitors associated with larger meetings), the overall peak parking demand could be up to 335 vehicles. This represents 93 per cent of the proposed 360 spaces.

The spread of parking across the site, with separate office and factory staff parking areas also aids IVE Group operations and minimises any such conflict of light vehicle movements on-site.

On this basis, the proposed parking supply is appropriate and supported as it meets the unique operational requirements of IVE Group while ensuring no risk of impact to on-street parking within AIE.

Across the proposed 360 parking spaces, four (4) accessible spaces are proposed in accordance with the DCP requirements. Additionally, 18 spaces will be readily available for EV charging, 44 bicycle spaces will be provided and one (1) shower cubicle / change room will be provided in accordance with the DCP.

6.1.2. Traffic Generation

Assessment Against the Endorsed Trip Generation Rates

Ason Group has worked extensively with TfNSW to come to agreeable trip rates for developments within the Mamre Road Precinct. As part of the approved Concept Masterplan, trip rates have been approved, higher than typical warehousing so that there is spare capacity for future use of some buildings for industrial purposes across the estate. These rates were requested by TfNSW at the time and agreed for adoption across the precinct. The conservative nature of the rates is evident in the new Guide to Transport Impact Assessment (GTIA released in November 2024) which specifies a rate of 0.14 trips per 100m^2 in the road network AM and PM peak hours. The proposed printing / manufacturing use at Warehouse / Lot 8 represents the first detailed, industrial operation approved within the AIE and consequently, the following rates are the approved trip rates applicable to the site and have been adopted for the purposes of assessment:

- AM peak hour – 0.23 trips per 100m^2
- PM peak hour – 0.24 trips per 100m^2
- Daily – 2.91 trips per 100m^2

The site was approved to generate 95 and 99 vehicle trips in the weekday AM and PM peak hours (under SSD-10448 MOD 6). The proposal, with an overall GFA consistent with the WH8 Base Build Modifications (see **Section 1.2.3** of this EIS for details) will result in the same traffic rates of 98 and 102 vehicle trips in the AM and PM peak hours respectively. This will result in an overall traffic generation for the broader AIE of 564 trips in the AM peak hour and 588 trips in the PM peak hour and would result in no discernible change in traffic conditions in and around the site.

Given IVE Group operations, it is similarly important to assess traffic generation based on office and factory staff movements (and heavy vehicle demand) across the day and night. Documenting a daily traffic profile is important to identify any such periods in which the anticipated traffic volumes may exceed the previously approved Warehouse 8 peak period traffic volumes. The daily profile considers the light vehicle volumes provided previously in **Figure 27**, as well as heavy vehicle volumes shown in **Figure 28** below.

It is important to note that this approach is consistent with the Benchmarking method and First Principles method as defined in the GTIA. The data used to for the assessment has been informed by existing IVE Group facilities, and used to determine mode split, arrival/ departure profiles and distribution. The GTIA states that the First Principles method is '*useful to supplement benchmarking approach or for land uses with a lack of survey data or comparable land uses, such as uncommon or special land use developments'*. It is also noted that GTIA states that '*in order to reduce the likelihood of overestimating or underestimating trip generation rates, it is preferrable to use robust, evidence-based and context-specific methods to calculate appropriate trip generation estimates*.' On this basis, and given the unique nature of IVE Group operations, the use of the First Principles method is appropriate and accordance with the GTIA.

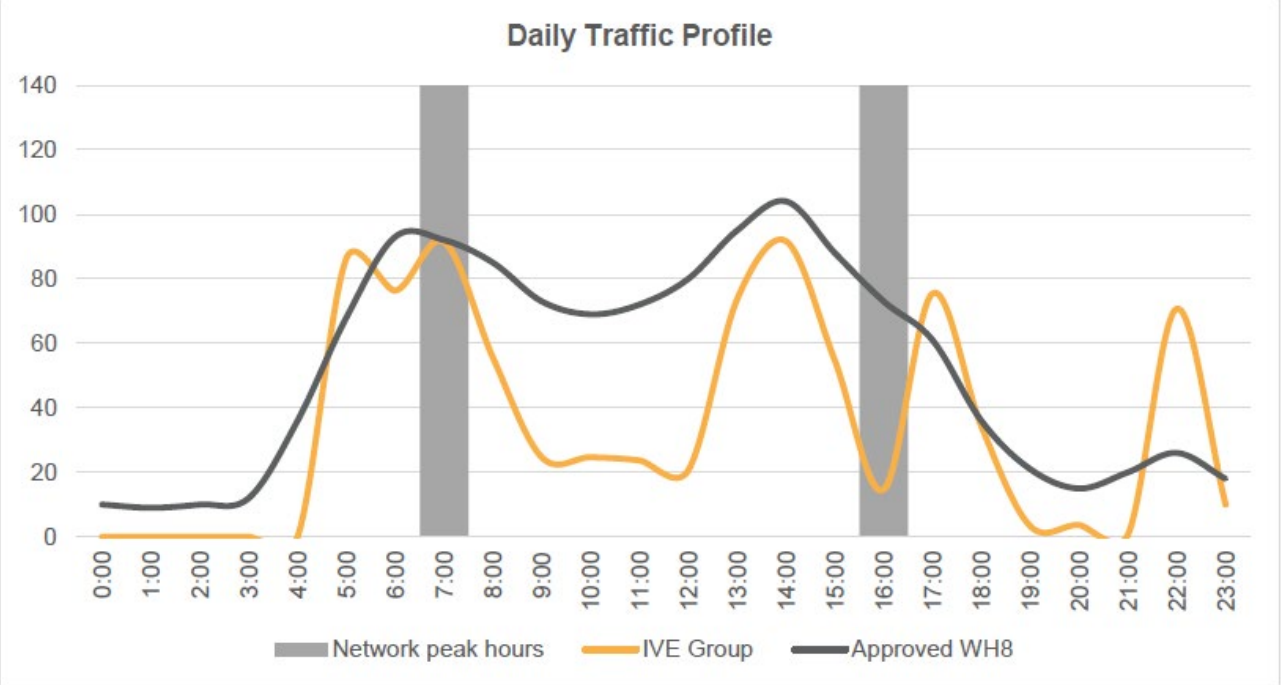
Figure 28 IVE Group Heavy Vehicle Movements

Truck Type	5am-8am	8am-11am	11am-2pm	2pm-5pm	5pm-8pm	8pm-11pm	Veh/ day
Rigid Truck	11	17	17	11	2	0	58
Semi-trailer	4	5	2	1	1	0	13
B-Double	0	2	1	0	0	0	3
Hook Bin	5	2	0	0	0	1	8
Container	4	2	1	0	0	0	7
Courier (van/ ute)	5	9	10	10	2	0	36

Source: Ason Group

The anticipated traffic volumes under the proposal are expected to exceed the approved Warehouse 8 volumes at 5:00am, 7:00am, 5:00pm and 10:00pm as seen in **Figure 29** below.

Figure 29 Modelled Daily Traffic Profile – Compared to Approved Development



Source: Ason Group

As shown in the figure above, the estimated light and heavy vehicle traffic volumes are generally lower than the volumes previously approved on the site. There are minor exceedances at 5:00 am (18 trips) and 10:00 pm (45 trips); however, these periods are well outside the road network peaks and are not expected to have a material impact on intersection operation. There is also a minor exceedance of 14 trips at 5:00 pm, which equates to about one trip every four to five minutes. These periods are also mostly due to light vehicle arrivals and departures associated with office and factory staff, with few heavy vehicle movements during these periods.

Overall, there is no real change in traffic generation during the road network AM peak hour and a noticeable reduction of 58 trips in the 4:00 pm to 5:00 pm period. On this basis, IVE Group operations would benefit traffic conditions at this time and contribute proportionately less traffic through the Mamre Road/Darrabarra Avenue signalised intersection.

Notwithstanding the above, SIDRA Intersection (SIDRA) modelling has been completed and benchmarked against approved modelling outputs to determine the impact of the additional traffic at 5:00pm. In May 2024, Ason Group completed SIDRA modelling in response to comments raised by Department of Planning, Housing and Infrastructure (DPHI) as it relates to midblock capacity. As part of Ason Group's response, the endorsed SIDRA base model was revised to include the traffic generated by the following approved developments:

- Mamre South Precinct, 657-769 Mamre Road, Kemps Creek
- Yiribana Logistics Estate, 772-786 Mamre Road, Kemps Creek
- Aspect Industrial Estate, 788-882 Mamre Road, Kemps Creek
- Access Logistics Park, 884-928 Mamre Road, Kemps Creek
- 200 Aldington Road Estate
- Westlink Stage 1
- BAPS Temple, 232 Aldington Road.

Given that this modelling formed the basis for the approval of AIE Stage 4 Development (Warehouse 8) (SSD-60513208), and all parameters were agreed upon with TfNSW and DPHI, this model has been adopted as the base to assess this proposed modification against. The traffic assessment adopts the same assumptions as the endorsed model, including cumulative traffic volumes, background growth, directional distribution, etc.

The anticipated performance of the Mamre Road/ Darrabarra Avenue intersection as approved compared to the development inclusive of the proposal is summarised below.

Table 18 Comparison of SIDRA Model Outcome

Intersection	Control	Period	Degree of saturation (DOS)	Delay	LOS
APPROVED 2026 MODEL					
Mamre Rd/ Darrabarra Ave	Signals	5pm-6pm	0.58	20.6	B
REVISED MODEL + DEVELOPMENT TRAFFIC					
Mamre Rd/ Darrabarra Ave	Signals	5pm-6pm	0.59	22.2	B

The table identifies that there is a minor impact on the operation of the Mamre Road/Darrabarra Avenue intersection when compared with the current approval. Specifically, the intersection would continue to operate at LOS B in both critical road network peak hours and remains consistent with the approved modelling outputs, with no changes to Level of Service and only minor increases to delay and Degree of Saturation. There is also a minor increase of less than 10 metres in the 95th percentile queue on the Darrabarra Avenue approach (65m to 74m). This is minor and equates to approximately less than two cars. With more than 350 metres between the Mamre Road hold line at the traffic signals and Pemul Place, there is ample queuing capacity on Darrabarra Avenue.

On this basis, the proposed new use is supported on traffic grounds with no discernible changes expected in traffic conditions in and around the site compared to the current approval.

6.1.3. Site Layout

The site access arrangements, on-site car parking, loading docks and hardstand areas have been designed to comply with relevant Australian Standards. This includes specific reference to the following:

- Australian Standard 2890.1:2004 – Parking Facilities – Off Street Car Parking
- Australian Standard 2890.2:2018 – Parking Facilities – Off Street Commercial Vehicle Facilities
- Australian Standard 2890.6:2022 – Parking Facilities – Off Street Parking for People with Disabilities.

Full compliance with the above Australian Standards would be expected to form a standard condition of consent to any approval. The at-grade car park has been designed as a User Class 1A facility with 2.4-metre-wide and 5.4-metre-long spaces with minimum 5.8-metre-wide circulation aisles. It is compliant with

the requirements of AS2890.1. All accessible spaces are designed to be 2.4 metres wide with an adjacent shared area (with central bollard) with the same dimensions, in accordance with AS2890.6.

Vehicle swept paths have been completed and these show access to and from the site and demonstrate appropriate design and layout with regard site access arrangements, internal circulation, car parking, loading bays and hardstand area layout. This includes capacity for 20m articulated vehicles (in accordance with AS2890.2:2018) and up to 30m A-Double vehicles (30m Performance Based Standards (PBS) Level 2 Type B vehicle) to enter the site, manoeuvre as required and exit in a forward direction.

6.1.4. Construction Traffic Management Plan

Ason Group have prepared a Construction Traffic Management Plan (CTMP) separately (report reference: P2169r04v2). The CTMP was issued to the Department of Planning, Housing & Infrastructure and was approved on 02 December 2024 (reference: SSD-60513208-PA-9(CTMP)).

This proposal will not result in changes to the approved CTMP as it relates to staging, vehicle sizes, timing etc. The approved CTMP therefore remains valid and will not require updating.

6.2. NOISE IMPACTS

A Noise Impact Assessment (**NIA**) has been prepared by SLR Consulting and is included in **Appendix K**. The NIA provides an assessment of the potential noise impacts generated by the proposed use for packaging and printing operation for IVE Group. The NIA has been prepared in accordance with the approved conditions of SSD-10448 and requirements of the SEARs.

The noise and vibration assessment demonstrates that the proposal will not result in any adverse acoustic impacts subject to a detailed noise source inventory, 'worst case' scenario analysis as well as a cumulative impact assessment which considers the impacts of the approved and proposed developments across the AIE and broader MRP. Since the noise assessment prepared for SSD-10448 MOD 6 and Warehouse 8 SSD-60513208 application, further noise assessment was prepared for Warehouse 6 and Warehouse 7 DA24/0264 application '*Aspect Industrial Estate Warehouse 6 & Warehouse 7 DA Noise Impact Assessment' (WH6 & WH7 NIA) (SLR Reference 610.19127-R13-v1.1-20241004, dated October 2024)'* and for the base build modification applications (detailed in **Section 1.2.4**) *Aspect Industrial Estate SSD-10448 MOD 9 and SSD-60513208 MOD 2 Noise Impact Assessment'* (MOD 9 NIA) (SLR Reference *610.19127-R15-v1.0-20250116.*

As detailed in **Section 3.2** of the EIS, the proposed printing operations require specific external mechanical plant, which produces a cumulative SWL in excess of 90 dBA. The project team has explored mitigation measures that could be incorporated into the plant to reduce the SWL and the cumulative assessment identifies that the proposal will maintain compliance with the Condition A16(b) noise limits at all receivers. As such, the intention of the condition will still be achieved, despite a non-compliance with the conditioned 90 dBA limit per warehouse under Condition A16(a) and thus, Condition A16(a) is proposed to be modified to reflect the updated acoustic requirements for Warehouse 8.

6.2.1. Updated Operational Noise Sources

The operational noise source assessment included an analysis of the updated operational requirements at Lot 8 as well as the approved operations across the other warehouse and distribution centres within the AIE. This informs a cumulative assessment of acoustic impacts across the AIE which provides a realistic, worst-case scenario assessment associated with the operation of the proposal.

The noise sources associated with the proposal, as part of the broader AIE, include:

- Delivery vehicle (trucks and vans) movements within each warehouse lot
- Passenger vehicle movements and car parking
- Loading dock activities in hardstands areas of the warehouses
- Fixed mechanical plant and equipment.

The typical worst-case 15-minute period volumes during the daytime, evening and night-time periods for vehicular movements has been updated to reflect the modified Lot / Warehouse 8 development and is detailed in **Table 19**.

Table 19 Vehicle Traffic Data – Typical Worst case 15-Minute Period

Warehouse	Number of Vehicles in Typical Worst-case 15-minute Period[1,2]					
	Daytime / Evening			Night-time		
	Light Vehicles	Medium Trucks	Heavy Trucks	Light Vehicles	Medium Trucks	Heavy Trucks
Warehouse 1	20	0	1	20	0	1
Warehouse 2	12	3	2	11	2	1
Warehouse 3	10	3	2	9	2	1
Warehouse 4	9	2	1	8	2	1
Warehouse 5	6	2	1	6	1	1
Warehouse 6	5	1	1	4	1	1
Warehouse 7	7	2	1	7	2	1
Warehouse 8	30	2	1	20	2	1
Warehouse 9	12	0 medium 6 vans	3	7	0 medium 5 vans	2
Estate Café	3	1	0	3	0	0

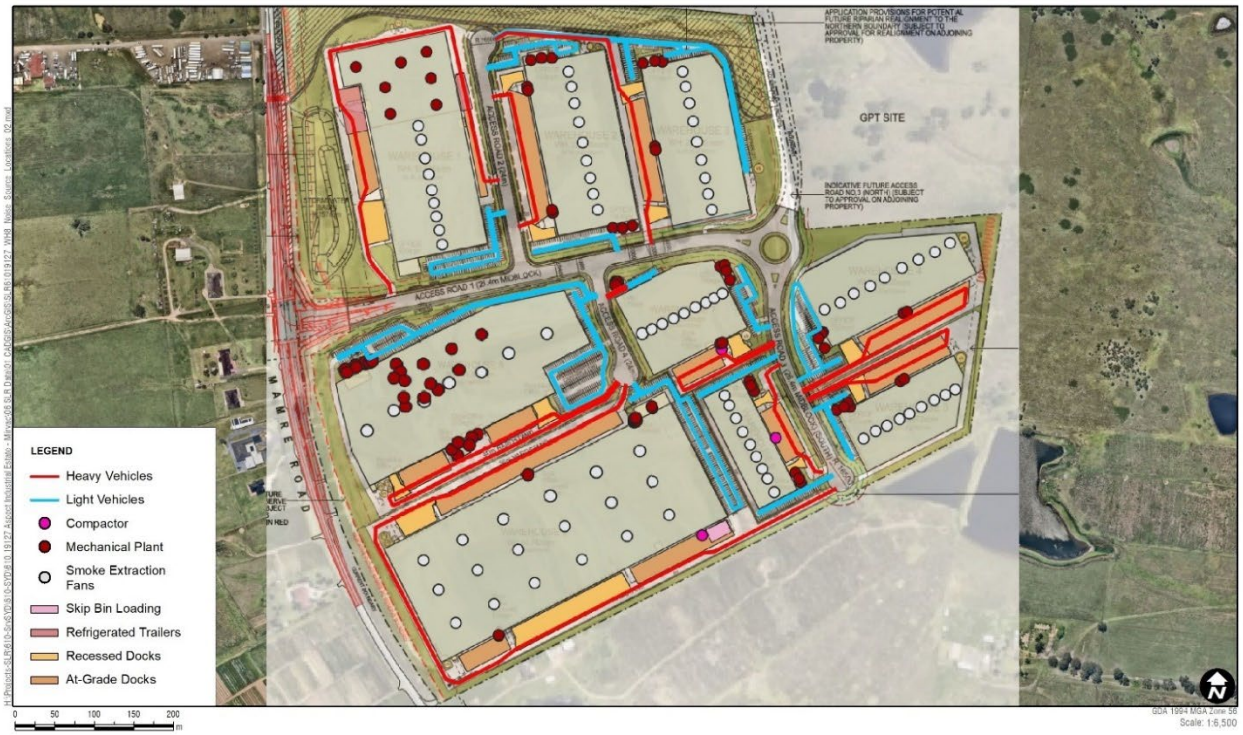
Note 1: Total vehicles, includes both inbound and outbound vehicles. Volumes are rounded up to whole numbers for display purposes.

Note 2: Warehouse 8 vehicles are based on based on tenant specific movements detailed in the SSD-80331959 traffic assessment report. Vehicles for other warehouses are consistent with the previous noise assessments. Minor discrepancies with the volumes compared to the traffic report may be apparent due to the rounding displayed in the respective tables.

Further to the vehicular movements generated by the AIE, the internal noise sources for the warehousing and office parts of Warehouse 8 would generally be consistent with the assumptions for the other warehouses. Internal noise sources for the manufacturing parts of Warehouse 8 include conventional and digital printing equipment, along with stitching, folding, finishing, mailing and packing equipment.

All items of acoustic instrumentation utilised in all measurements detailed below were designed to comply with AS/NZS IEC 61672.1 *Electroacoustics – Sound level meters* and carried current calibration certificates. Where possible SLR have adopted measurement procedures with consideration to ISO 3744:2010 *Acoustics _Determination of sound power levels and sound energy levels of noise sources using sound pressure – Engineering methods for an essentially free field over a reflecting plane*.

Figure 30 Updated Noise Source Locations.



Source: SLR

6.2.2. Updated Operational Sound Power Levels

Further to the updated Typical Worst case 15-Minute Period vehicle movements (detailed in **Table 19** above) the assumed vehicle sound power levels and the loading dock noise source power levels are consistent with the previously prepared NIAs.

With regard to the mechanical plant noise generation, the updated cumulative noise generation is detailed in the table below. The modelled noise generated by the mechanical plants supportive of the IVE Group operations were informed by the power level measurements of the existing mechanical plant and operations at the IVE Group facilities in Silverwater and Homebush, NSW. It is noted that that the cumulative sound power level of Warehouse 8 external mechanical plant exceeds the limit of 90 dBA under Condition A16(a) (thus, this condition is proposed to be modified as detailed in **Section 3.2** of this EIS).

Table 20 External Mechanical Plant Sound Power Levels

Plant Item	Details and Sound Power Level	Location and Operating Hours
Warehouse 1 – Cumulative total 88 dBA		
Warehouse refrigeration / temperature control units	Fusion VPAC – 7 units – 80 dBA each	Roof of temperature-controlled area of warehouse. Assumed to operate 24/7.
Warehouse smoke extraction fans	SEF units – 9 units – 94 dBA each	Roof the warehouse. Emergency use only[2]
Warehouses 2 to 7 – Cumulative total up to 90 dBA each warehouse		
Warehouse air conditioning condensers	VRV condensers – 2 units – 82 dBA and 79 dBA	Adjacent to main offices at ground level. Assumed to operate 24/7.
Main offices exhaust fans	OAF unit – 1 unit – 75 dBA TEF unit – 1 unit – 64 dBA	Roof of each main office. Assumed to operate 24/7.

Plant Item	Details and Sound Power Level	Location and Operating Hours
Dock offices fans	Daikin ACU – 1 unit – 70 dBA Blauberg TEF – 1 unit – 60 dBA	Roof of each dock office. Assumed to operate 24/7.
Warehouse smoke extraction fans	Pacific Ventilation SEF units – 9 units – 78 dBA each	Roof of each warehouse. <50% during normal operation (100% during fire emergencies) Assumed to operate 24/7.
Warehouse 8 – Cumulative total 98 dBA		
Base build main office fans and condensers	VRV condensers – 2 units – 82 dBA and 79 dBA OAF unit – 2 units – 75 dBA TEF unit – 2 units – 64 dBA	Roof of main office. Assumed to operate 24/7.
Base build dock office fans and condensers	Daikin ACU – 1 unit – 70 dBA Blauberg TEF – 1 unit – 60 dBA	Roof of dock office. Assumed to operate 24/7.
Warehouse smoke extraction fans	SEF units – 7 units – 77 dBA each	Roof of warehouse. 50% speed during normal operation (100% speed during fire emergencies) Assumed to operate 24/7.
Chillers	TechnoTrans Glycol Chiller Type GRA 177/35(40)/L – 2 units – 82 dBA each	Plant area adjacent to main office. Assumed to operate 24/7.
Temperature control PAC units	Temperzone OPA 2110 Econex Pro – 4 units – 82 dBA each Temperzone OPA 1410 Econex – 3 units – 70 dBA each	Roof of warehouse – 4 units above Coolroom 1, 3 units above Coolroom 2. All units operating in night/quiet mode. Assumed to operate 24/7.
Exhaust flues	6 exhaust flues – 86 dBA each (based on measurements at existing IVE facility)	Roof of warehouse – 3 flues above Coolroom 1, 3 flues above Coolroom 2. Assumed to operate 24/7.
Waste room exhaust fans	GEF-CR – 1 unit – 86 dBA GEF-WR – 1 unit – 70 dBA DGEF-1 – 1 unit – 78 dBA	Roof of compressor room, waste room and dangerous goods room, respectively. Assumed to operate 24/7.
Dust extractor	1 unit – 86 dBA (based on measurements at existing IVE facility)	Hardstand adjacent to waste room and dock office. Assumed to operate 24/7.
Warehouse 9 – Cumulative total 90 dBA		
Main office air conditioning	Hitachi RAS-3HVNC1 – 1 unit – 58 dBA Hitachi RAS-24FSXNS – 1 unit – 74 dBA Hitachi RAS-22FSXNS – 1 unit – 72 dBA Hitachi RAS-18FSXNS – 2 units – 73 dBA each Hitachi RAS-16FSXNS – 1 unit – 71 dBA	Main office plant area (ground level). Assumed to operate 24/7.
	Pacific Ventilation AX63DB18A-4DAF – 1 unit – 87 dBA Pacific Ventilation DQ56DB16P-4CSF – 1 unit – 87 dBA	Main office roof. Assumed to operate 24/7.
Dock office air conditioning	Hitachi RAS-3HVNC – 2 units at each dock office (4 total) – 58 dBA each	Adjacent to each dock office (ground level). Assumed to operate 24/7.
Warehouse smoke extraction fans	Pacific Ventilation SEF units – 16 units – 78 dBA each	Roof of the warehouse. Emergency use only[2]

Plant Item	Details and Sound Power Level	Location and Operating Hours
Estate Café – Cumulative 71 dBA		
Café air conditioning	Daikin ACU – 1 unit – 70 dBA Blauberg TEF – 1 unit – 60 dBA	Café roof. Assumed to operate 24/7.
Kitchen extraction fan	Extraction fan – 1 unit – 61 dBA Indicative sound power level based on SLR measurements of similar café kitchen extraction fans.	Café roof. Assumed to operate 24/7.

Additionally, the proposed operations at Warehouse 8 will be facilitated by the following internal, mechanical plant and equipment across the different operational areas of the floorplan (detailed in **Section 3.3**).

Table 21 Internal Mechanical Plant and Equipment SWLs

Item ID	Noise Source	Location	Sound Power Level	Source Height (m)
WH01 – Coolroom 1				
WH01A	K&B Rapida 10 Colour	Western WH01	101 dBA	2.0
WH01B	K&B Rapida 7 Colour	Western WH01	101 dBA	2.0
WH01C	Heidelberg XL10	Western WH01	101 dBA	2.0
WH01D	BOBST Novacut – 2 units	Centre WH01	86 dBA each	1.0
WH01F	Heidelberg Varimatrix	Centre WH01	86 dBA	1.0
WH01 Various	Minor equipment	Eastern WH01	71 dBA	1.0
WH02 – Coolroom 2				
WH02A	Durst P5 – 3 units	Western WH02	86 dBA each	1.0
WH02F/G	Ricoh / Xerox Printers – 6 units	Centre WH02	86 dBA each	1.0
WH02N	HP T370 Continuous Inkjet	Centre WH02	97 dBA	2.0
WH02O	Kern 3500 – 2 units	Centre WH02	94 dBA each	1.0
WH02C/D/E	HP Indigo 7k & 7800 – 2 units	Eastern WH02	91 dBA each	1.0
	HP Indigo 100k	Eastern WH02	94 dBA	1.0
WH02P	Pitney Bowes – 3 units	Eastern WH02	95 dBA each	1.0
WH03 – Finishing & Packing				
WH03 Various	Minor equipment	Centre WH03	68 dBA	1.0
WH03H	BOBST Novacut	Eastern WH03	86 dBA	1.0
WH04 – Folding, Mailing & Packing				
	Original Heidelberg Cylinder	Western WH04	93 dBA	1.0

Item ID	Noise Source	Location	Sound Power Level	Source Height (m)
WH04 Various	Polar Guillotine – 2 units	Western WH04	87 dBA each	1.0
	Stahl Folder – 3 units	Centre WH04	95 dBA each	1.0
	Buhrs 300	Centre WH04	90 dBA	1.0
WH04B	Sitma – 4 units	Eastern WH04	104 dBA each	1.0
WH05 – Stitching, Folding & Packing				
WH05 Various	Minor equipment	WH05	74 dBA	1.0
WH05B	Muller Martini Primera	Southwest WH05	100 dBA	1.0
WH14 – Compressor Room				
WH14	Compressors	WH14	88 dBA Ambient	n/a
WH16 – Waste Room				
WH16	Waste extraction system, compactor	WH16	86 dBA Ambient	n/a

Further to the sound power levels detailed above, the modelling of the internal noise sources accounts for the façade construction of the warehouse.

6.2.3. Updated Operational Noise Levels

Consistent with the prior NIAs, indicative future warehouse buildings throughout the MRP have been included in the noise model, along with associated areas of hard ground (modelled with a ground absorption of 0.00). Other areas are modelled with rural soft ground (ground absorption of 0.75). The buildings throughout the MRP are indicative and subject to change in their respective future development applications. The prevailing weather conditions have also been accounted for in the updated modelling.

An updated summary of the predicted typical worst-case operational noise levels from the AIE, including the predicted levels include all noise sources operating simultaneously across the entire AIE, is provided at **Table 22**, which reflects the proposed development at Lot / Warehouse 8. These modelled outcomes accounts for the recommended mitigation measures.

Table 22 Operational Noise Assessment

Receiver Area	Period (weather)	LAeq(15 minutes) Noise Level (dBA)					Compliance
		Noise Limit	MOD 9 NIA Predicted	Exceedance	WH6 & WH7 NIA Predicted	Change	
West Residential	Daytime (standard)	39	30	-	30	0	Yes
	Evening (standard)	34	30	-	30	0	Yes
	Night-time (standard)	29	29	-	29	0	Yes
	Night-time (noise-enhancing)	29	29	-	29	0	Yes

Receiver Area	Period (weather)	LAeq(15 minutes) Noise Level (dBA)					Compliance
		Noise Limit	MOD 9 NIA Predicted	Exceedance	WH6 & WH7 NIA Predicted	Change	
Southeast Residential	Daytime (standard)	39	27	-	27	0	Yes
	Evening (standard)	34	27	-	27	0	Yes
	Night-time (standard)	29	27	-	26	+1	Yes
	Night-time (noise-enhancing)	29	28	-	26	+2	Yes
BAPS Temple	When in use (day/ evening) (standard)	36	34	-	33	+1	Yes

The assessment indicates that the predicted noise levels in the receiver areas comply with the noise limits during all periods.

Sleep Disturbance Assessment

An updated assessment and summary of the predicted LAmax noise levels from the AIE during the night-time period is shown in **Table 23**.

Table 23 Sleep Disturbance Screening Assessment

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

Note 1: Predicted LAmax noise levels are shown for noise-enhancing weather conditions.

With consideration of the above, sleep disturbance impacts are unlikely and further detailed assessment of maximum noise levels is not required.

Intermediate Monitoring Locations

As part of the Operational Noise Management Plan prepared for the AIE (AIE ONMP) (SLR Report 610.V14410.00002-ONMP-R01-v1.2-20240118, dated January 2024), intermediate monitoring locations and associated reference noise levels were specified as part of the operational noise compliance monitoring.

The reference noise levels have been reviewed for the proposed development and are detailed below. The NIA reference noise levels at each intermediate location and their correlation to the noise limits at the relevant compliance locations are summarised in **Table 24** below.

Table 24 Noise Limits

Location ID	Relevant Compliance Location	Period	Noise Limit at Compliance Location	Correlation Between Intermediate and Compliance Location – MOD 10 NIA	Reference Level at Intermediate Location – MOD 10 NIA	Reference Level at Intermediate Location – MOD 9 NIA	Change in Reference Level
L01	West Residential	Day (standard weather)	39	32	**71**	71	0
		Evening (standard weather)	34	32	**66**	66	0
		Night (standard weather)	29	28	**57**	57	0
		Night (noise-enhancing weather)	29	28	**57**	57	0
L02	West Residential	Day (standard weather)	39	24	**63**	63	0
		Evening (standard weather)	34	24	**58**	58	0
		Night (standard weather)	29	24	**53**	53	0
		Night (noise-enhancing weather)	29	24	**53**	53	0
L03	Southeast Residential	Day (standard weather)	39	37	**76**	76	0
		Evening (standard weather)	34	37	**71**	71	0
		Night (standard weather)	29	36	**65**	65	0
		Night (noise-enhancing weather)	29	36	**65**	65	0
	BAPS Temple	When in use (day/evening) (standard weather)	36	30	**66**	66	0
L04	Southeast Residential	Day (standard weather)	39	35	**74**	74	0
		Evening (standard weather)	34	35	**69**	69	0

Location ID	Relevant Compliance Location	Period	Noise Limit at Compliance Location	Correlation Between Intermediate and Compliance Location – MOD 10 NIA	Reference Level at Intermediate Location – MOD 10 NIA	Reference Level at Intermediate Location – MOD 9 NIA	Change in Reference Level
		Night (standard weather)	29	35	**64**	64	0
		Night (noise-enhancing weather)	29	35	**64**	64	0
	BAPS Temple	When in use (day/evening) (standard weather)	36	28	**64**	64	0

The above table shows that the reference levels at the intermediate locations for the proposed development are consistent with the previous reference levels established under the prior NIAs.

6.2.4. Mitigation Measures and Recommendations

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

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

Further to these mitigation measures, the following table provides an overview of the additional mitigation measures that will be able to reduce the acoustic impacts generated by the proposed external mechanical plant.

Table 25 Warehouse 8 External Mechanical Plant Mitigation Measures

Plant Item	Location	Sound Power Level	Mitigation Implemented	Mitigated Sound Power Level Used In Assessment
Base build office and dock office fans and condensers	Roof of main office and dock office.	8 units – 60 to 82 dBA each 85 dBA total	Quieter units will be investigated during detailed design.	85 dBA total (TBC during detailed design)

Plant Item	Location	Sound Power Level	Mitigation Implemented	Mitigated Sound Power Level Used In Assessment
Warehouse smoke extraction fans	Roof of warehouse.	7 units – 91 dBA each 100 dBA total	SEF units will run at 50% speed for general daily ventilation / night purge.	77 dBA each 86 dBA total
Chillers	Plant area adjacent to main office.	3 units – 90 dBA each (based on measurements at existing IVE facility)[1] 95 dBA total	Quieter units have been sourced from the supplier of the internal equipment that the chillers service. Acoustic screening will be considered during detailed design.	2 units – 82 dBA each 85 dBA total (acoustic screening would not reduce the unit sound power level, but would lower the noise level measured outside the plant area)
Temperature control PAC units	Roof of warehouse above Coolrooms.	4 units – 89 dBA each 3 units – 81 dBA each 95 dBA total	Quieter units have been sourced from the supplier. Night/quiet mode will be used on all units.	4 units – 82 dBA each 3 units – 70 dBA each 89 dBA total
Exhaust flues	Roof of warehouse above Coolrooms.	6 exhaust flues – 86 dBA each (based on measurements at existing IVE facility)[1] 94 dBA total	Exhaust flue mitigation such as low-noise extraction fans, silencer tips and/or in-duct acoustic lining will be investigated during detailed design.	94 dBA total (TBC during detailed design)
Waste room exhaust fans	Roof of compressor room, waste room and dangerous goods room.	3 units – 70 to 86 dBA each 87 dBA total	Quieter units will be investigated during detailed design.	87 dBA total (TBC during detailed design)
Dust extractor	Hardstand adjacent to waste room and dock office.	86 dBA (based on measurements at existing IVE facility)[1]	Quieter unit from the supplier will be investigated during detailed design. Acoustic screening will be considered during detailed design.	86 dBA (TBC during detailed design) (acoustic screening would not reduce the unit sound power level, but would lower the noise level measured outside the plant area)
Total Cumulative Sound Power Level		Unmitigated – 103 dBA	Mitigated – 98 dBA (potential for further reduction during detailed design)	

As detailed in in **Section 6.2.3** above, despite the exceedance of the Condition A16(a) cumulative sound power level limit for Warehouse 8 external mechanical plant, the modified operations of Warehouse 8 result only in minor increases to the overall predicted noise levels from the AIE at compliance locations, and does not result in any exceedance of the Condition A16(b) noise limits.

As such, the intention of Condition A16 will still be achieved (ie, limiting the noise impacts at sensitive receivers), despite a non-compliance of the Condition A16(a) cumulative sound power level limit of 90 dBA for Warehouse 8 external mechanical plant. It is noted that the 90 dBA limit was based on an assumption that informed the initial AIE cumulative noise assessment and was not reflective of any specific known end user for the site. Additionally, the cumulative sound power level does not take into account acoustic shielding or directivity attenuation of sources, which mitigate the noise path from source to receiver.

In this regard, SSD-10448 Condition A16(a) is proposed to be modified to remove the sound power level limit for Warehouse 8, or extend the limit for Warehouse 8 to 98 dBA. Otherwise, the proposal is supportable from an acoustic perspective.

6.3. AIR QUALITY

An Air Quality Impact Assessment (**AQIA**) has been prepared by SLR and is attached at **Appendix L** which provides an assessment of the proposed operations.

6.3.1. Existing Environment

This assessment considers the potential generation of Volatile Organic Compound (**VOC**) emissions from the proposed development, which are chemical compounds which may generate air quality impacts. Considering the location of the Site within an industrial area, it is not likely to be the only source of VOC emissions in the area. Possible local air emissions sources include:

- Vehicle exhaust emissions from local traffic, including heavy goods vehicle servicing nearby industrial sites;
- Products of combustion from commercial boilers and heaters, etc, that may be installed at sites within the industrial park; and
- VOCs from fuel and chemical storage and handling at sites within the industrial park.

A review of the National Pollutant Inventory (**NPI**) did not identify any major sources of VOCs in the area and the other potential sources, such as fuel storage and handling, would only be expected to have localised impacts and are unlikely to result in elevated VOC concentrations beyond their site boundaries. As such, there is a low risk of potential for cumulative impacts associated with VOCs and hasn't been considered further.

6.3.2. Assessment of Impacts

There are four key activities none of which release any significant emissions to ambient air (no air pollutant emissions have been identified for assessment):

- Digital Printing
  - Digital printing provides improved precision and flexibility in printing. Unlike traditional offset printing, digital printing does not require the creation of printing plates and involves transferring digital files directly onto the printing substrate whether paper cardstock or other materials. This is the same method of printing used for office photocopiers as is for IVE's large format digital printing machines. When the ink is digitally transferred onto the substrate it dries instantly removing the requirement for the ink to be dried and the need to extract any emissions.
- Glue
  - IVE utilises a glue jet system within the workflows to adhere any products together (such as a moisturiser sample to a magazine). This task is completed within the warehouse in the WH03 - Finishing & Packaging zone within the warehouse. No additional ventilation or PPE is required from a WHS perspective. There are no known, significant emissions emitted to ambient air.
- Powder extraction
  - The paper sheets IVE utilises in the printing process have fine particles on them which interfere with the high-quality printing process. IVE have an extraction machine which automatically cleans / vacuums the sheets which goes through a filtration system. The particles are dropped into a hopper and emptied manually, which then enables the extraction system to exhaust the equipment's hot air to atmosphere, with insignificant amounts of particulate matter being discharged. This process is like a vacuum cleaner, the particles are deposited and the hot air generated from the suction is exhausted.
- KBA coating and drying
  - Some products require either an additional matt or gloss finished applied to meet customer requirements. Once the coating is applied the product is put under a UV light to enable the product to dry. There is an extraction system off the UV light extracting hot air to atmosphere only.

With regard to the proposed inks, the VOC content for inks is estimated to be between 11 g/L and 56 g/L for the HP A50 inks and for the purposes of assessment, it has been conservatively assumed that all proposed inks used are HP A50 (i.e. total usage = 24.573 kg sheetfed ink + 16.814 kg digital ink = 41 .387 kg per year). The emission rates are estimated based on the HP A50 VOC content stated above.

The following VOC emissions are anticipated to be generated by the proposed printing / manufacturing operations as detailed in **Section 3.3** of this EIS.

Table 26 Estimated VOC Emissions

Parameter	Value	Units
Annual throughput	41,387	kg
Maximum daily throughput	120	kg
Type of ink	HP A50/Novavit F950	-
Proposed hours of operation	24	Hours per day
Density	1.05	G/mL
VOC content	11-56	g/L
VOC emissions	434-2,207	Kg/year
VOC emissions	50-434	Kg/day

In the context of the calculated annual emissions in the published NPI for the Penrith LGA, the total annual estimated emissions for total VOCs generated by the proposal is 424-2,207kg, constituting 0.01%-0.04% of the Penrith LGA total VOC emissions (Penrith LGA NPI total VOC emissions in 2022-23 being 5,700,000kg).

A risk-based qualitative assessment approach has been adopted for the proposed operational activities. Risk-based qualitative factors that informed this assessment include:

- **Nature of Impact:** The nature of the impact is anticipated to be adverse due to VOC emissions from the printing operations.
- **Receptor Sensitivity**: As shown in the **Figure 31**, there are several residential receptors located in the surrounding area, with the nearest ones situated approximately 100 m south of the Project site. Additionally, numerous industrial receptors are positioned adjacent to the northern, eastern, and western boundaries of the site. These industrial receptors include amenities such as office buildings and workshops, where individuals may be exposed to air quality impacts from the Project's operations. Given their proximity, the sensitivity of the residential receptors to VOC emissions should be considered high, while the sensitivity of the industrial receptors is considered medium.

Figure 31 Surrounding Receptors

- **Magnitude**: The risk posed by the Project to the surrounding receptors is deemed negligible.

With consideration of the worst-case operational scenario, VOC emissions from the printing processes are expected to be minimal compared to the total emissions in the LGA and since RA106X will not involve combustion processes and will be powered from the grid, emissions from combustion sources are not anticipated. Therefore, the proposed operations are deemed to be of neutral significance, with negligible expected adverse impacts on nearby residential or industrial receptors.

In line with the risk-based methodology, the air impacts generated by the proposal are deemed to be of neutral significance. Based on the worst case assumptions that all ink used is digital ink with the highest VOC content, the maximum daily usage of 120 kg/day is used every day over a year, and all VOCs are emitted to air, the Protect represents less than 0.05% of the Penrith LGA VOC total.

6.3.3. Mitigation Measures

Notwithstanding the negligible impacts during the worst-case operational scenario, the following mitigation measures are proposed.

- VOC Mitigation Measures
  - Use low-VOC or water-based inks and cleaning solutions where feasible.
  - Implement best-practice solvent management, including proper storage, handling, and disposal of VOC-containing substances.
  - Ensure all VOC-emitting equipment is properly maintained and enclosed where possible to minimize fugitive emissions.
  - If appropriate, install activated carbon filters or other appropriate emission control technologies to capture VOCs from printing and cleaning processes.
  - Maintain adequate ventilation within the facility to disperse emissions efficiently and minimize worker exposure.
- General Air Quality Control Measures
  - Regularly inspect and maintain air filtration and ventilation systems to ensure optimal performance.
  - Provide staff training on best practices for minimizing emissions, including proper solvent usage and storage procedures.
  - Consider monitoring air quality in and around the site to assess the effectiveness of mitigation measures and identify any additional control needs.

6.4. STORMWATER MANAGEMENT

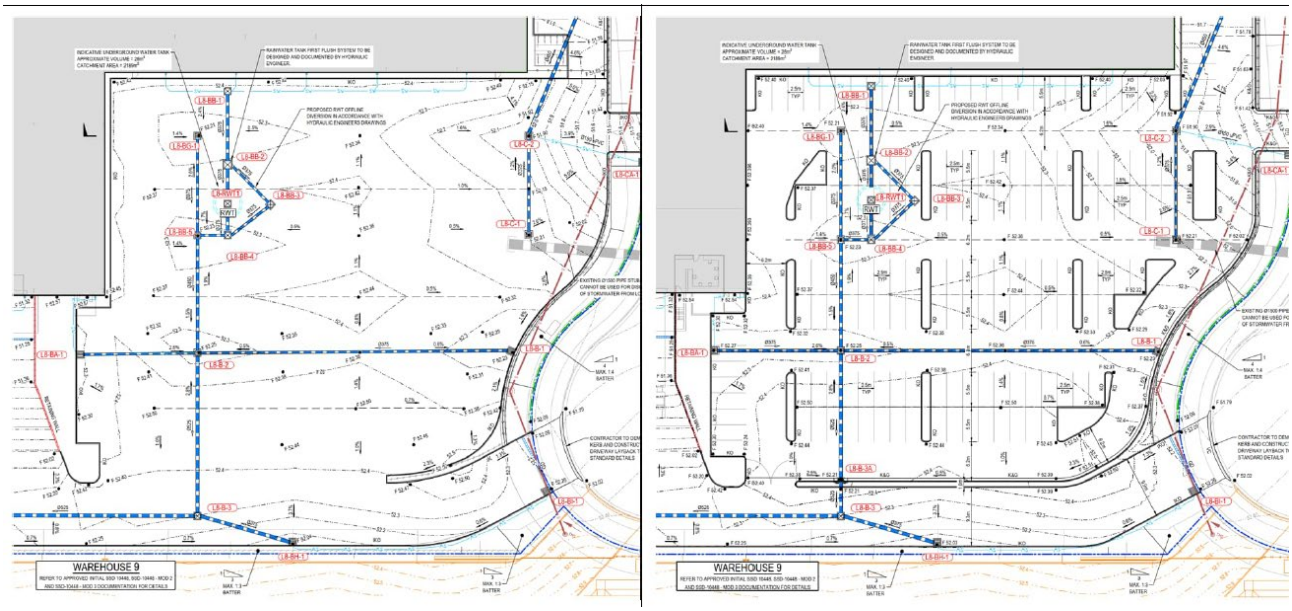
A Civil Design Statement has been prepared by AT&L (**Appendix M**) in support of the proposal. As detailed in **Section 1.2.3**, separate modification applications are being progressed to facilitate the built form and lot layout across Warehouse / Lot 8 to facilitate the intended IVE Group operations. The base build modifications are supported by a Civil Report which is entitled "REP021-02-18-596-Lot 8 Civil Infrastructure Report MOD2", dated 16/01/25. A copy of this report is appended at **Appendix M** for ease of reference.

As detailed in **Section 3**, the proposal is for the internal fitout and use of the Warehouse 8 building, with external changes limited to introducing car parking within the hardstand area in the eastern portion of the site. The total footprint of the hardstand area does not change, but with the introduction of the landscape median islands within the hardstand carpark area, there is a very small increase in permeable area compared to impermeable area, which has very small, but positive benefits to stormwater runoff.

Adjustments to the civil design are proposed as part of this proposal to account for the introduction of car parking, otherwise, there are no other civil design changes required to support the proposal. AT&L can confirm that the adjustments made to the civil design have had a negligible effect to the civil design itself, and as such, the discussions included within AT&L's aforementioned Civil Infrastructure Report remain applicable and true and the proposal will result in no additional stormwater impacts than those previously assessed.

A comparison of the civil design sought under the base build modifications and the refined design in support of the proposal is shown in **Figure 32** below.

Figure 32 Comparison of Civil Drawing (Left, under Base Build Modification) (Right, proposed as part of this project)



Source: AT&L

6.5. WASTE MANAGEMENT

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

- Avoidance (to prevent the generation of waste);
- Reduce the amount of waste (including hazardous waste) for disposal;
- Manage waste as a resource; and

- Ensure that waste treatment, disposal, recovery and re-use are undertaken in a safe, scientific and environmentally sound manner.

6.5.1. Demolition Works

The quantum of waste generated as part of the demolition works will be commensurate with that considered for the site wide demolition works approved under the Stage 1 consent to SSD-10448. No additional site preparation or demolition works are expected to be required to accommodate the proposal.

6.5.2. Construction Waste

The material volumes of waste for the Warehouse 8 building construction are expected to be generally unchanged compared to the original Stage 4 consent and the approved for the management of construction waste for WH8 are expected to remain valid.

With regard to the proposed internal fit out works, this will consist mostly of installation of equipment and use of pre-fabricated materials and therefore, any damaged, offcut or surplus materials are expected to be able to be recovered by manufacturers for reuse.

Through the construction phase of the proposed development, a waste storage area shall be designated by the construction contractor and shall be sufficient to store the various waste streams expected during operations. Waste storage areas will be kept clear to maintain access and shall also be kept tidy to encourage separation of waste materials and for WHS reasons. The waste storage area will retain multiple bins to allow for source separation of waste to allow for ease of recovery and reuse of materials.

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

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

6.5.3. Operational Waste Management

Ongoing waste management for Warehouse 8 building will be undertaken to support the daily operation of the proposed IVE Group tenant operations and the associated with the industrial printing use. Waste generation rates have been calculated by extrapolating waste volumes from existing operations from a similar use operated by IVE located in Kemps Creek.

IVE have provided a comprehensive summary of waste generation volumes generated at their existing site and advised MRA that the proposed development at AIE WH8 is expected to generate approximately 30% less waste than the site where waste data is derived. Table 27 below provides an overview of the estimated operational waste volumes and storage requirements.

Table 27 Estimated Operational Waste Volumes & Storage Requirements

Waste Stream / Material Type	Disposal or Recycling Method	Volume per month (t)	Proposed Storage Method	Approximate Storage Area Required (m²)	Collection Frequency and Method
Liquid	Thermal treatment	1.75	IBCs (Approx. 1.2m x 1m each)	3m²	Monthly
Wash cloths	Thermal treatment	0.5	4-6 x 200lt drums (approx. 600mm diameter each)	6m²	Monthly
Waste ink	Thermal treatment	0.3	1-2 x 200lt drums (approx. 600mm diameter each)	2m²	Monthly

Waste Stream / Material Type	Disposal or Recycling Method	Volume per month (t)	Proposed Storage Method	Approximate Storage Area Required (m²)	Collection Frequency and Method
General & wet waste	Landfill	~30	30m³ Hook bin (approx. 6.5m x 2.5m) + 3m³ Bulk Bin (approx. 3.4m)	20m²	Weekly bulk bin collection, Monthly hook bin collection
Rags	Landfill	0.01	Drums	1m²	Monthly or as required
Paper & Cardboard	Recycled	103	30m³ Hook bin / compactor (approx. 6.5m x 2.5m)	16.25m²	Weekly
Timber	Recycled	2.7	30m³ Hook bin (approx. 6.5m x 2.5m)	16.25m²	Monthly or as required
Plastic Ink containers	Recycled	0.05	Open-top IBC	1m²	Monthly or as required
UV Lamps	Recycled	0.01	Boxes	1m²	Monthly or as required
Metal	Recycled	2.05	3 cube Hook bin	3.5m²	Monthly or as required
Comingled	Recycled	0.2	2-4 x 240L bins	2m²	Weekly or fortnightly
Plastic	Recycled	2.3	Compacted bales	4m²	Monthly
Polypropylene	Recycled	0.65	Boxes	4m²	Monthly or as required
Total approximate storage footprint				80m^2	
Total Approx. Storage Area Required*				160m^2	

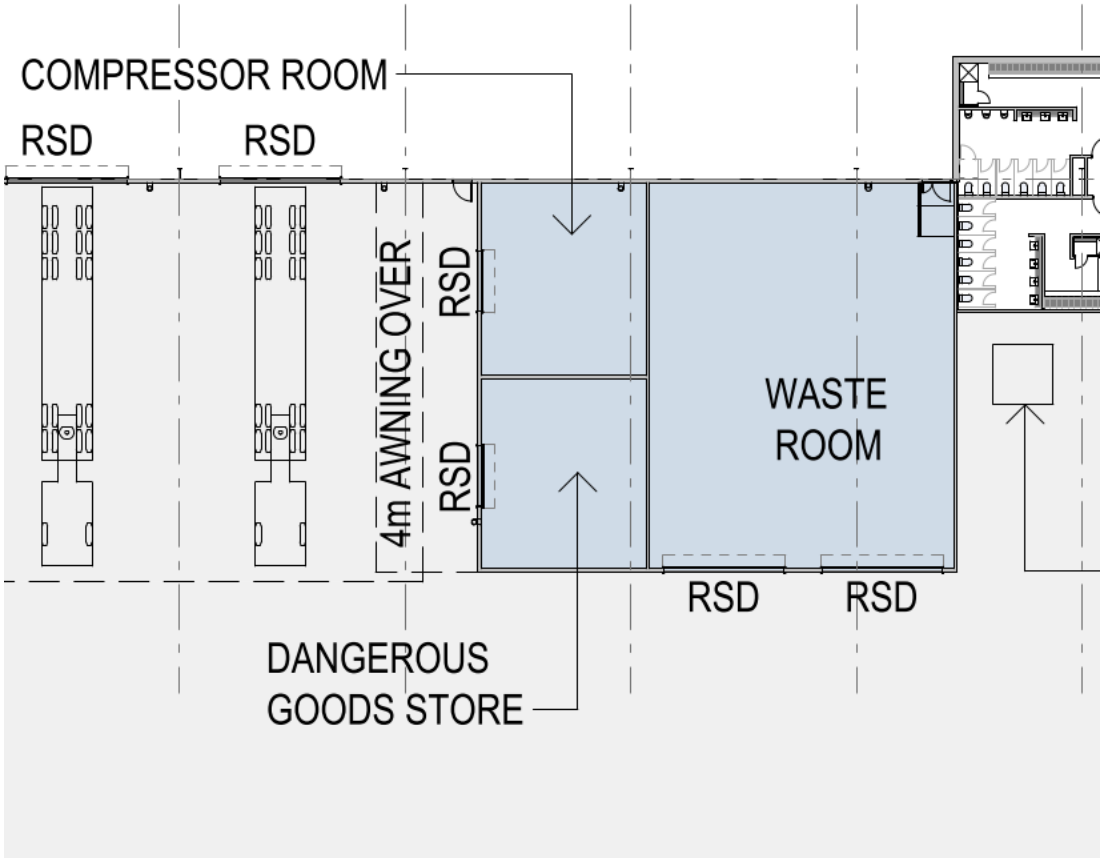
It is noted that standard water re-use onsite is captured as part of the stormwater management strategy. Therefore, no wastewater is generated in IVE's operation.

A combination of mobile garbage bins, bulk bins, compactors/hook lift bins, drums, IBCs and compacted bales have been utilised by IVE at other similar sites. These methods are tested and proven to be effective at managing the types and quantity of waste generated at existing IVE sites, and are expected to be suitable for the management of waste streams generated from operation of the proposed development.

The managing staff operating the proposed development can observe the fullness of bins and other waste storage containers once the site is fully operational and adjust the number of collections, size of storage containers or number of storage containers according to actual need.

An industrial waste storage room has been provided adjacent to the dock office of approximately 295m2 in size (see **Figure 33**). The space provided is sufficient in accommodating space for the infrastructure detailed in the table above and provides flexibility for changes to the waste management arrangement in future, if required.

Figure 33 Warehouse 8 Building Storage Area



Source: SBA Architects

Interim containers within offices and active operational areas will be available, sufficient for interim storage of waste materials equivalent to one day's generation of these materials which can then be transferred to the main waste storage area for consolidation at the end of each day.

To further mitigate any environmental impacts, the waste generated by the IVE printing operations will be managed and controlled as follows:

- Paper- all wastepaper is 100% recycled
- Cardboard- all cardboard is 100% recycled
- Electricity- heat generated from electrical cabinets and UV dryers is discharged to atmosphere, inks are mostly water-based, and do not include any significant VOC content, and therefore exempted from any licensing requirements. This will be further addressed in the AQIA.
- Water- containerised and removed by Licenced waste disposal company
- Liquid consumables- containerised and removed by Licenced waste disposal company
- Chemicals and oils- containerised and removed by Licenced waste disposal company

Site personnel will be responsible for the emptying of these bins and containers daily and transporting materials to the site's waste storage area.

The Waste Management Plan includes details on the guidelines and standards for the:

- Waste Management and Recycling Method
- Hazardous Waste Management
- Management System and Responsibilities
- Collection Method and Loading Areas

- Waste and Recycling Storage Areas
- Signage
- Prevention of Pollution and Litter Reduction

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

6.6. HAZARD AND RISK

A Resilience and Hazards SEPP Report has been prepared by Riskcon (**Appendix O**) which provides an assessment of the dangerous goods that may be stored on-site in support of the proposed industrial printing operations. The proposed operations will require the store materials that are classified as Dangerous Goods (**DG**s).

The purpose of IVE's tenancy of the Warehouse 8 building is to aggregate a number of operations, including DGs stored, in warehouses and logistics sites around Sydney. The Kemps Creek site will aggregate the operations across sites in Granville, Homebush, and Silverwater. DGs across these existing tenancies to be stored at the site include Classes 2.1 (flammable gases, including Liquified Petroleum Gas (LPG)), 3 (flammable liquids), 8 (corrosive substances), and 9 (miscellaneous). A summary of the quantities of DH stored and handled at the site is summarised in **Table 28** below and their respective use and storage location is shown in **Figure 24** above.

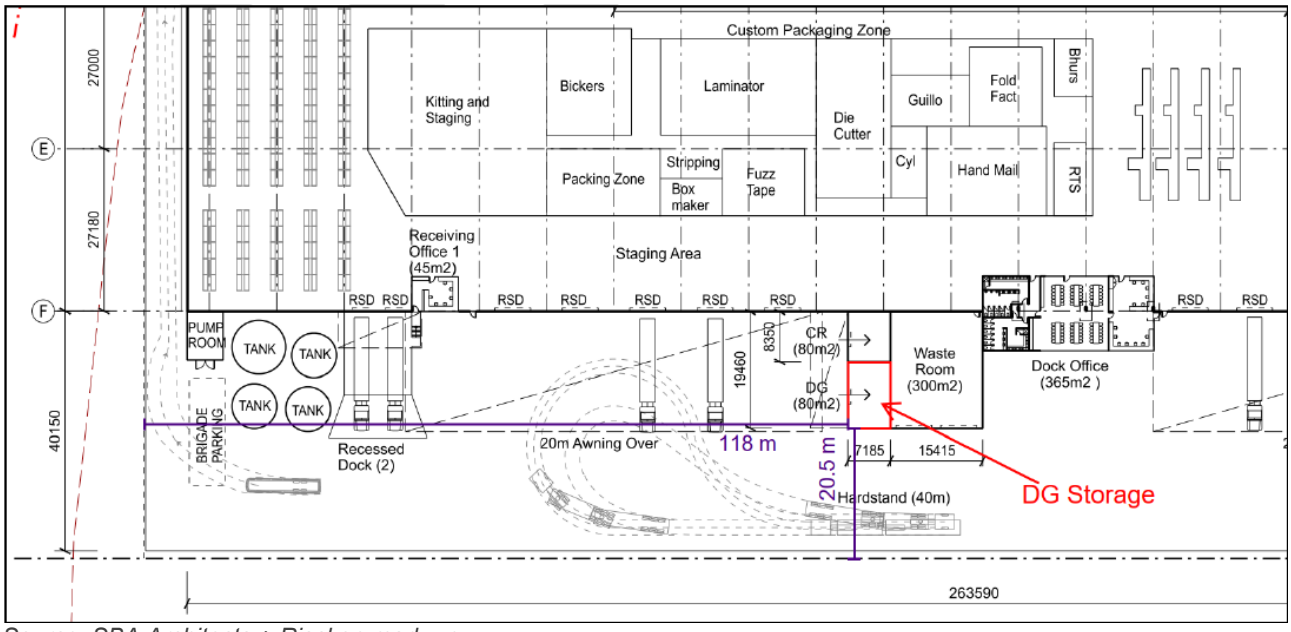
Table 28 Quantities of DGs Stored and Handled

Class	Description	PG	Quantity (kg or L)	SEPP Threshold (kg or L)	Does SEPP Apply? (Y/N)
2.1	Flammable gases (excl. LPG)	N/A	65	100	N
2.1	Liquified Petroleum Gas (LPG)	N/A	285	10,000	N
3	Flammable liquids (e.g. isopropanol, printing ink, etc.)	II & III	5,540	5,000	Y – requires graphical method
8	Corrosive substances (sodium hydroxide, potassium hydroxide, hypochlorite etc.)	II & III	350	25,000	N
9	Miscellaneous DGs	III	185	N/A	N/A

The flammable liquid threshold is exceeded; therefore the storage must be assessed based upon the distance to the site boundary. Based on the combined storage of 5.54 tonnes of flammable liquids, a distance of at least 3.2 m is required from the closest boundary, and 4.9 m from any sensitive uses. Reviewing the proposed storage location of the DGs indicate they will be stored more than 4.9 m from the warehouse boundary (see **Figure 34** below), with the Coolrooms 1 and 2 (where DGs are proposed to be used) well in well in excess of the lot boundary.

As such, the majority of DGs to be stored and transported do not exceed the minimum application thresholds of SEPP (Resilience and Hazards). The proposed quantity of Class 3 (Flammable Liquids) DGs to be stored and transported could trigger the application of SEPP-RH if they are stored too close to the site (warehouse) boundary. However, analysis of the plans shows that the DGs are sufficiently separated from the site boundary; thus, Chapter 3 of SEPP (Reslience and Hazards) will not apply to the project. Furthermore, the classes and quantities of DGs to be stored will not exceed the minimum threshold for transport.

Figure 34 Distance of DGs Storage from Warehouse Boundary



Source: SBA Architects + Risckon mark-up

Nonetheless, the following general recommendations have been made for sites storing DGs::

- The DGs shall be stored in a manner which complies with the applicable storage standards (i.e. AS 3833:2024 or class specific standards such as AS 1940:2017).
- The documentation required by the Work Health and Safety (WHS) Regulation 2017 shall be prepared to demonstrate the risks have been assessed and minimised So Far As Is Reasonably Practicable (SFAIRP) as required by the WHS Regulations.
- Where flammable gases or liquids are stored, a hazardous area classification in accordance with AS/NZS 60079.10.1:2022 (Ref. [4]) shall be prepared to ensure that an ignition source does not enter a hazardous atmosphere as required by the WHS Regulations.

An analysis of the plans shows that the DGs are sufficiently separated from the site boundary; thus, Chapter 3 of SEPP (Resilience and Hazards) will not apply to the project. Furthermore, the classes and quantities of DGs to be stored will not exceed the minimum threshold for transport. A review of the potential to cause offense was conducted which indicated the site operations would be unlikely to result in noise or odour occuring at levels which would cause offense.. An EPA license would not be required for this site. It is not necessary to prepare a Preliminary Hazard Analysis for the facility as Chapter 3 of SEPP (Resilience and Hazards) will not apply.

6.7. BCA AND FIRE ENGINEERING

Blackett Maguire + Goldsmith have undertaken a review of the warehouse building design against the deemed-to-satisfy (**DtS**) provisions of the Building Code of Australia 2022 Volume 1 (BCA) (**Appendix P**).

The development is comprised as Class 5 (Office), Class 7b (Warehouse) and Class 8 (Manufacturing), with a rise in storey of 2. Arising from the review, the proposed development can readily achieve compliance with the relevant provisions of the BCA.

It is identified that the following BCA clauses (see **Table 29** below) are matters that can be addressed in the detailed design process through non-fire safety performance solutions. Where compliance matters are proposed to comply with the Performance Requirements (rather than the DtS Provision) the development of a Performance Solution Report will be required prior to the issue of the Construction Certificate. Notwithstanding the above, it is considered that the proposed development can readily achieve compliance with the BCA subject to resolution of the matters identified in the table below.

Table 29 Overview of Matters to be Resolved at CC Stage

BCA (DtS) Clause	Description
C2D11 & Spec. 7	Architectural specifications & certification is to be provided at CC stage demonstrating that the proposed floor, wall & ceiling linings achieve compliance with the requirements of Spec. 7.
D2D5	Internal layouts require further development to facilitate compliant travel distance to a point of choice.
D2D7 – D2D11	Provide further details regarding walk-through areas within the warehouse demonstrating compliance with the requirements of these clauses. Specific attention is brought to the areas in between equipment or machinery and walkthrough areas between racking within both the Raw Material Storage area (east and west). BM+G are to be advised of all trafficable and inaccessible areas with respect to egress purposes.
D3D4, D3D14 – D3D21 & D2D23	Detailed plans of all stairways, balustrades and handrails within the proposed development must be provided for review.
D3D24, D3D25 & D3D26	The proposed plans show a roller shutter door along the path of egress in the south-west corner of Coolroom 2. Confirm if appropriate door-opening mechanisms are proposed to be provided, as stipulated above, or whether a swing door is to be provided adjacent (as is the case for the remainder of these doors). Door and hardware schedules must be provided to BM+G for review.
Part D4 and F4D5	A separate report will be required from an Access Consultant to outline the applicable requirements for the building. Specific details regarding the possible application of D4D5 to the various Class 7b & 8 portions of the building will also be required. We understand the proposed IVE fitout within the warehouse area is proposed to remain exempt from the accessibility provisions under D4D4 & 1428.1 – 2009.
E1D2, E1D3, NSW E1D4, E1D12 & E1D13	Wet Fire Services consultants to provide fire hydrant, hose reel & sprinkler plans for review, and confirm if any modifications to these systems is required as a result of the proposed fitout.
E2D9 & NSW E2D10	Dry Fire Services consultant to confirm if any modifications to these systems is required as a result of the proposed fitout.
F3P1	Confirm the proposed works are capable of maintaining compliance with the DtS requirements of Part F3, and the F3P1 Performance Solution Report approved under the base build. Where compliance is not maintained, a new/updated Performance Solution will be required.
F4D4	1x additional basin is required to be provided as part of the male sanitary facilities.
G1D3	Provide further details and certification regarding the proposed cool rooms demonstrating compliance with respect to door type and hardware, lighting, alarm requirements as per G1D3

6.7.1. Fire Safety Strategy (Warehouse 8)

A Fire Safey Strategy (**FSS**) has been prepared by Core Engineering Group (**Appendix Q**) which reviews the elements of the proposal that do not comply with the DtS requirements of the BCA and provides guidance for the future, detailed design documentation to incorporate the relevant performance solutions and fire engineering requirements. A summary of the proposed performance solutions is provided in the table below.

Table 30 Overview of Fire Safety Performance Solutions

PROVISION TITLE	TITLE	NON-COMPLIANCE(S)	PROPOSED PERFORMANCE SOLUTION
D2D5	Extended Travel Distance (Office)	▪ Up to 25 m to the point of choice in lieu of 20 m on the first floor	▪ Sprinkler to the office. ▪ Smoke detection to the office.

PROVISION TITLE	TITLE	NON-COMPLIANCE(S)	PROPOSED PERFORMANCE SOLUTION
D2D5, D2D6	Extended Travel Distance & Rationalised Smoke Exhaust System	▪ Up to 30 m to a point of choice. ▪ Up to 95 m to the nearest exit ▪ Up to 190 m between alternative exits ▪ Rationalisation of the automatic smoke exhaust system – An exhaust rate of one enclosure air change per hour – Omission of exhaust from other ancillary areas such as offices and awnings.	▪ Sprinklers throughout with fast response heads ▪ Smoke detection shall be provided throughout the warehouse area and cool rooms (subject to CFD modelling). ▪ Travel distance to exit the building envelope is no greater than 100 m. ▪ Rationalised automatic smoke exhaust system within the warehouse and coolrooms. ▪ PIR construction of coolrooms creates discrete enclosures that occupants can evacuate between during their evacuation to reduce potential exposure to untenable conditions ▪ Awnings serve as a temporary safe refuge for occupant evacuation.
E1D2	Fire Hydrant System Design	▪ AS2419.1:2021 used despite the building exceeding 108,000 m³. Also: – Hydrants under awnings – Internal on-floor hydrants – Block plan size	▪ Hydrants located beneath the awnings shall be designed AS2419.1:2021 and be treated as external hydrants with fall-back hydrants. ▪ Sprinkler protection is provided throughout the building, including the area beneath the awnings. ▪ Coverage via internal hydrants shall be provided to serve the building's central area. ▪ Additional measures for Large Isolated Buildings, per Appendix C of AS2419.1:2021 ▪ The block size to be a minimum A1 in size or as deemed legible by the fire brigade.

It is noted that the scope of the IVE fit-out relates to the internal fit-out of the warehouse. As such, the external perimeter vehicular access path (in accordance with FRNSW's access guideline) shall be unchanged as a result of these proposed works, noting that Performance Solutions relating to the perimeter vehicular access path are addressed as part of the (soon-to-be-approved) base build modification package (subject to review and endorsement by FRNSW).

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

6.8. UTILITY INFRASTRUCTURE SERVICING

A Servicing Infrastructure Assessment Report has been prepared by AT&L (**Appendix V**) which provides an overview of infrastructure servicing requirements to support the intended operations. The key public utility assets required to support the proposed development are predominantly being undertaken at an estate-wide level and have been installed as part of the estate infrastructure works and approvals under SSD-10448 and SSD-60513208. This includes:

- **Potable Water Reticulation**: provided within the internal road network, with connections to existing watermains within Mamre Road. A DN200 potable watermain has been constructed under Sydney Water case CN194154PW along the northern side of Road 01 (Darrabarra Avenue), being the opposite side of Road 01 to where Lot 8 is located. Additionally, A DN150 potable watermain has been constructed under Sydney Water case CN198859PW along the eastern side of Road 04 (Pemul Place), being the opposite side of Road 04 to where Lot 8 is located. These watermains were sized to service the Aspect Industrial Estate, including Lot 8. No further potable water reticulation works are anticipated to be required.
- **Recycled Water Reticulation**: provided within the internal road network. Presently, the internal recycled watermain network is cross-connected to the Potable Watermain network as the regional Recycled Watermain network is not yet fully constructed and operational (to be completed by others, namely Sydney Water). Of note, Lot 8 will draw rainwater from on-lot provided rainwater tanks, for onsite re-use

in toilet flushing and landscape irrigation in the interim until the regional stormwater harvesting scheme is operational by Sydney Water, and recycled water is flowing through the reticulated recycled watermains.

No further recycled water reticulation works are anticipated to be required.

- **Waste Water Reticulation**: presently drains to an Interim Operating Procedure (IOP) (pump out holding tank) located in the north-western corner of the Aspect Industrial Estate. This IOP is known as the Central IOP. No further wastewater reticulation works are anticipated to be required.
- **Stormwater Discharge**: within the Estate with two separate stormwater discharge locations for Lot 8 provided in the north-western corner, and the eastern side of Lot 8.
- **Electrical Reticulation**: within the internal road network, including the provision of HV cabling. Site specific substation requirements will be delivered subject to the detailed design phases of the Warehouse / Lot 8 development (SSD-60513208). Further to co-ordination with Endeavour Energy, Lot 8 will be supported by 3 x 1,500kVa pad-mounted electrical substations, and 1 x 22kV electrical switching station. The location and design of these infrastructure works are not affected by the proposal, and are reflected in the relevant plans.
- **Telecommunications Infrastructure Reticulation**: within the Estate, including both NBN pit and pipe and Telstra pit and pipe infrastructure. Both NBN and Telstra pit and pipe have been installed along both sides of Road 01 (Darrabarra Road) and Road 04 (Pemul Place). Multiple P100 conduit tail outs have been provided along Road 01 and Road 04 to provide alternative connection points. Whilst fibre may need to be back-hauled to service Lot 8, it is not expected that any additional pit and pipe works will be required. Any required back-haul works will be subject to separate funding agreements between the preferred communications provider and the Applicant.

6.9. ECOLOGICALLY SUSTAINABLE DEVELOPMENT

An updated Ecologically Sustainable Development Report (**ESD Report**) has been prepared by Stantec Australia to support the proposal (**Appendix S**). The report demonstrates that the development as proposed to be modified will maintain the ESD principles and greenhouse gas and energy efficiency measures, consistent with:

- Secretary's Environmental Assessment Requirements (SEARs) for the development (SSD-80331959);
- The NSW Environmental Planning and Assessment Act 1979;
- The NSW Environmental Planning and Assessment Regulation 2021;
- State Environmental Planning Policy (Industry and Employment) 2021;
- State Environmental Planning Policy (Sustainable Buildings) 2022;
- Penrith Development Control Plan (DCP) 2014; and
- Mamre Road Precinct Development Control Plan (DCP) 2021.

6.9.1. ESD Opportunities

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

- Lower operational energy demand via improved thermal performance;
- Promote greater indoor environmental quality;
- Reduce the building's reliance on HVAC systems;
- Improve building occupant comfort; and
- Improve the project's capacity to deliver a responsible development.

The project's as-built environmental performance will be equivalent to a 5 Star Green Star project, based on the Green Star Building tool - which represents Australian Excellence within the built environment.

6.9.2. Greenhouse Gas and Energy Efficiency

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

- Building to be net positive for carbon emissions.
- On-site Renewable Energy Production: 300 kW solar system
- Electric car and truck charging dedicated bays.
- Energy Efficient lighting systems (internal and external).
- Control of lighting systems.
- Façade Thermal Performance / Building Thermal Mass comply with NCC 2019 Section J requirements.
- Maximise natural lighting (including through the application of translucent roof materials where possible).
- Solar Gain Reduction / Shadings.
- Efficient HVAC System Equipment within Office spaces.
- Embodied Energy reduction associated to construction material selection.

The proposed printing and packaging operations, will be designed and delivered in accordance with IVE Group's committed targets to:

- Achieve 100% renewable electricity operation by 2030.
- Achieve a minimum 25% reduction in scope 1 & 2 emissions intensity by 2025 against a CY21 baseline.
- Reduce total operational waste intensity by 20% by 2025 on a CY21 baseline.

To meet this, a number of initiatives are proposed to reduce the greenhouse gas emissions and environmental impacts, further to the design initiatives detailed above:

- Dedicated storage area is provided for the separation, collection and paper recycling.
- The use of new generation fully electric forklifts that are emission free, quiet and clean.
- Modern printing machine that are energy efficient, very low VOC with water-based inks and recyclable ink drums.

6.9.3. Water Efficiency

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

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

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

6.9.4. Other Measures

Other ESD design measures, including waste management (detailed in **Appendix S**) and alternative transport / green travel plan (detailed in **Appendix J**) are detailed in the respective sections of this EIS.

Additionally, the proposed development design, including materiality as well as the provision of amenity spaces and end-of-trip facilities will deliver a comfortable workplace for employees.

6.10. BIODIVERSITY

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

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

The proposal is generally consistent with the overall footprint of the concept masterplan approved under SSD-10448 and no additional vegetation is proposed to be removed. The assessment concluded that the proposed development will not result in any impact on biodiversity values beyond those assessed as part of the existing BDAR for SSD-10488. Therefore, the assessment concludes that the proposal will not result in impacts to biodiversity values and no mitigation measures are required. As such, it is requested that a waiver is granted for both the SSD-10448 MOD 10 and SSD-80331959 applications.

6.11. SOCIAL IMPACT ASSESSMENT

An addendum Social Impact Assessment has been prepared by Urbis and is attached at **Appendix X**. In July and October 2020, Urbis Community Planning completed a Social Impact Assessment (SIA) in support of the concept approval (SSD-10448). The purpose of this addendum is to review the potential social impacts from the modification which may have changed from the amended (and approved) design. Given the nature of the proposed changes (provided below), this statement provides a comment on three potential social impacts that directly relate to Warehouse 8, and were also considered in the original SIA for the concept proposal and/or the addendum letter prepared for Warehouse 8:

- Construction impacts
- Operational noise impacts
- Operational traffic impacts

The assessment of these impacts has been informed by the methodology set out in the addendum letter prepared by Urbis for Warehouse 9 (January 2023) from the DPHI's Social Impact Assessment Guideline (2023). An overview of the social impacts related to the proposal is as follows:

- **Operational noise impacts**: as detailed in **Section 6.2** of this EIS, the proposal is anticipated to comply with relevant operational noise limits during both day and night and are not expected to exceed sleep disturbance levels.
- **Construction impacts**: With the implementation of the original SIA recommendations, this is likely to be managed and have a low social impact.
- **Operational traffic and parking impacts**: As detailed in **Section 6.1** of the EIS No additional mitigation measures are required as all were implemented during the Concept Masterplan stage. At which point the residual impact is therefore assessed as low.
- **Contribution to employment opportunities for Western Sydney Aerotropolis**: IVE Group, a major printing, media marketing, and distribution company, currently operates across three sites in Granville, Homebush, and Silverwater. The operations at the AIE aim to consolidate these activities into a single location within the WSA. The consolidation of IVE Group's operations within the Western Sydney Aerotropolis under the proposal presents a significant positive impact on employment opportunities, offering increased job prospects and supporting the region's economic development more effectively.
- **Operational air quality impacts**: As detailed in **Section 6.3** & **6.6** of this EIS, the impact is considered low when mitigating factors are applied.
- **Appropriate provision of worker amenity**: It is understood that up to 307 staff may occupy the facility at any given time. In response to the increased workforce, the proposal includes provision for improved worker amenities, including office space, bathroom facilities, end-of-trip facilities, and accessible bathrooms. A total of 19 bathroom stalls are distributed across two locations, supported by shower facilities, which is considered an appropriate provision for the proposed scale of operations. Architectural plans indicate kitchen and lunchroom facilities on both the ground level and first floor level, adjacent to the staff office spaces, in addition to the presence of a kitchenette adjoining a training room or dining hall,

near to the dock office area. Given the lack of/ undefined availability of on-site or nearby 24/7 hospitality or dining services, this level of amenity is reflective of amount of staff on site and the likelihood that staff will bring food for meal breaks, ensuring support for worker wellbeing and functionality of the facility. This positively contributes to the social outcomes of the development by promoting a healthier, more functional workplace environment and enhancing daily comfort and satisfaction for the workforce.

With consideration of the above, there is no significant social impact resulting from the proposed modification when compared to the previously approved development and furthermore, a positive outcome is anticipated through the increase in employment opportunities. This ensures that the community's well-being remains protected while supporting the continued development and operational efficiency of the Estate.

6.12. OTHER ENVIRONMENTAL IMPACTS

In light of the limited nature of the proposed modification applications, the following matters have been adequately addressed in prior studies and approvals granted to the site and will not be impacted by the proposal.

- Aboriginal Cultural Heritage Assessment
- Non-Indigenous Heritage Impact
- Bushfire Risk
- Contamination and Site Remediation
- Airport Safeguarding
- Geotechnical assessment
- Surface and Groundwater Impact Assessment
- Salinity and Acid Sulfate Soils Management
- Flood Risk
- Crime Prevention Through Environmental Design

7. JUSTIFICATION OF MODIFIED PROJECT

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

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

7.1. PROJECT DESIGN

The proposal has been designed to retain the key principles of the overall Aspect Industrial Estate layout approved in the Concept Proposal and the Lot 8 / Stage 4 Development consent. These principles include:

- The proposal will not affect the design and location of the intersection works with Mamre Road, connectivity of the internal road network with neighbouring lots, or provision of the creek and riparian extent along the north of the AIE.
- The proposed development will contribute to the long-term future supply of operational industrial land and will deliver high quality landscaped lots with sustainable and attractive buildings which are functional and respond to the operational needs of future tenants.
- The proposal will maintain a logical lot layout arrangement and vehicular accessibility. The proposed modifications will align with the staged development across the AIE over time in line with infrastructure delivery and market demand for industrial and urban services land.
- The proposal will continue to deliver a co-ordinated architectural design and form across Lot 8 which aligns with the broader AIE and facilitates visual diversity while responding to the potential view impacts across from the surrounding area.
- Appropriate acoustic mitigation design elements, internal access roads, services infrastructure as well as stormwater and drainage elements are provided. These ensure the modified development will continue to deliver an appropriate development outcome that does not adversity impact the area.
- The proposal generally retains a consistent GFA and applies the parking rates under the MRP DCP.

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

7.2. STRATEGIC CONTEXT

The proposal will support the future operation of the approved Warehouse 8 / Lot 8 development within the AIE as to meet the demands future tenants and thus, delivers usable warehousing and industrial facilities in South-Western Sydney.

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

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

- The proposal will provide employment land uses in alignment with the relevant transport infrastructure and utilities.
- The proposal responds to market requirements and will realise the delivery of the employment land within 30-minutes of residential suburbs.
- The proposal will not affect the staged delivery of the AIE, responding to long-term projected population and development growth.

The proposal is consistent with the MRP DCP with regard to built-form, landscaping and parking requirements and controls. The proposal will support the functionality of strategically important employment lands, continue to support the supply of e-commerce in the Sydney metropolitan region while appropriately delivering an appropriate environmental outcome within the region.

7.3. STATUTORY CONTEXT

The relevant State and local environmental planning instruments are outlined in **Section 4** and assessed in detail within **Appendix C**. The assessment concludes that the modified proposal complies with the relevant provisions within the relevant instruments as summarised below:

- The proposal has been assessed and designed in respect to the relevant objects of the EP&A Act as defined in Section 1.3 the Act and addressed **Appendix C**.
- Consideration is given to the relevant matters for consideration as required under the BC Act. A BDAR assessment was undertaken as part of the original SSD-10448 application and no works are proposed that would affect the outcomes of that assessment.
- The proposal complies will all of the relevant provisions of SEPP (Industry and Employment) 2021 as detailed in **Appendix C**. The proposal is consistent with the objectives of IN1 General Industrial zone.
- The relevant State and local environmental planning instruments are outlined in **Section 4** and assessed in detail within **Appendix C**. The assessment concludes that the proposal comply with the relevant provisions within the relevant instruments as summarised below:
  - The proposal comply with all of the relevant provisions under the I&E SEPP 2021 as detailed in **Appendix C**.
  - The proposal will not result in any impacts to the relevant species and maintains compliance with the EPBC Act.
  - Concurrence from TfNSW will be required as per the Transport and Infrastructure SEPP.
  - The proposal has been prepared to maintain compliance with the MRP DCP provisions as they relate to providing safe and efficient access to Mamre Road.

7.4. COMMUNITY VIEWS

As set out in **Section 5**, there was significant engagement with neighbouring landowners during the preparation phase of SSD-10448 and formal pre-lodgement engagement has yet been undertaken in relation to the proposal with the relevant community stakeholders and government authorities.

Email correspondence was issued to DPHI prior to the lodgment of these modification reports (dated 14.11.2024 and 19.11.2024) providing a summary of the proposed modifications in conjunction with the intended, separate DA for the base build modification to the layout of Warehouse 8. Additionally, email correspondence with DPHI was issued in 15.04.2025 on the acoustic assessment requirements.

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

7.5. LIKELY IMPACTS OF THE MODIFIED PROPOSAL

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

- **Natural Environment**: the proposed modifications address the principles of ecologically sustainable development (**ESD**) in accordance with the requirements of the Environmental Planning and Assessment Regulation 2021 (**the Regulations**) and as outlined below:
  - Precautionary principle: the precautionary principle relates to uncertainty around potential environmental impacts and where a threat of serious or irreversible environmental damage exists, lack of scientific certainty should not be a reason for preventing measures to prevent environmental degradation. The proposal will not result in any threat of serious environmental damage or degradation.

  - Intergenerational equity: the needs of future generations are considered in decision making and that environmental values are maintained or improved for the benefit of future generations. The development represents sustainable development, making use of a recently rezoned site for this purpose in a strategically accessible location. The proposal will not have any unacceptable impacts on the environment.
  - Conservation of biological diversity and ecological integrity: the proposal will not have any unacceptable impacts on the conservation of biological diversity and ecological integrity. The proposal includes landscaped areas and setbacks including native species planting.
  - Improved valuation, pricing and incentive mechanisms: this requires the holistic consideration of environmental resources that may be affected as a result of the development including air, water and the biological realm. It places a high importance on the economic cost to environmental impacts and places a value on waste generation and environmental degradation. The proposal will not have any unacceptable environmental impacts in relation to air quality, water quality or waste management. The effects of the development will be acceptable and managed accordingly by the proposed mitigation measures as required.

- **Built Environment**: the proposal will not result in any additional traffic impacts, the proposal will achieve the relevant air quality criteria and will continue to comply with the relevant sensitive receiver noise level requirements. The revised building layout will not change the building height and overall warehouse design principles and materiality.
- **Social**: there is no significant social impact resulting from the proposed modification when compared to the previously approved development and furthermore, a positive outcome is anticipated through the increase in employment opportunities. This ensures that the community's well-being remains protected while supporting the continued development and operational efficiency of the Estate.
- **Economic**: The proposal will have positive economic impacts through enabling the delivery of industrial uses on site which will result in investment and economic benefit for Sydney as well as the wider region.

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

7.6. SUITABILITY OF THE SITE

The site is considered highly suitable for the modified proposal for the following reasons:

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

7.7. PUBLIC INTEREST

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

- The proposal is consistent with relevant State and local strategic plans and substantially complies with the relevant State and local planning controls.
- No adverse environmental, social or economic impacts will result from the proposal.
- Subject to the various mitigation measures recommended by the specialist consultants, no adverse, social or economic impacts will result from the proposal.
- The issues identified during previous stakeholder engagement have been addressed through the assessment of the impacts of the modified project.

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

DISCLAIMER

This report is dated June 2025 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd **(Urbis)** opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Mirvac **(Instructing Party)** for the purpose of Modification Report **(Purpose)** and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A SEARS COMPLIANCE TABLE

APPENDIX B UPDATED PROJECT DESCRIPTION

APPENDIX C STATUTORY COMPLIANCE TABLE

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APPENDIX F ARCHITECTURAL DRAWINGS

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APPENDIX J TRAFFIC STATEMENT

APPENDIX K NOISE IMPACT ASSESSMENT

APPENDIX L AIR QUALITY IMPACT ASSESSMENT

APPENDIX M STORMWATER LETTER OF SUPPORT

APPENDIX N WASTE MANAGEMENT PLAN

APPENDIX O DANGEROUS GOODS ASSESSMENT

APPENDIX P BCA ASSESSMENT REPORT

APPENDIX Q FIRE SAFETY REPORT

APPENDIX R UPDATED EMBODIED EMISSIONS MATERIALS FORM

APPENDIX S ESD REPORT

APPENDIX T EDC REPORT

APPENDIX U LANDSCAPE MASTERPLAN

APPENDIX V SERVICING INFRASTRUCTURE ASSESSMENT

APPENDIX W BDAR WAIVER

APPENDIX X SOCIAL IMPACT ASSESSMENT

APPENDIX Y ENGAGEMENT OUTCOMES REPORT

APPENDIX Z NET ZERO STATEMENT

APPENDIX AA IVE EQUIPMENT LIST

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