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URBIS

STORAGE AND DISTRIBUTION WAREHOUSE

Scoping Report

Prepared for
HB+B PROPERTY
19 March 2025

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

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Project Code	P0077737
Report Number	Final



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

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.

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1. INTRODUCTION

This Scoping Report has been prepared on behalf of HB+B Property (**the Applicant**). This Scoping Report constitutes a request for Industry-Specific Secretary's Environmental Assessment Requirements (**SEARs**) to guide the preparation of an Environmental Impact Statement (**EIS**) that will accompany a State Significant Development Application (**SSDA**) at 221-235 Luddenham Road, Orchard Hills (**the site**).

The request relates to the proposed development of a beverage Storage and Distribution Warehouse. As the proposal includes development that has an estimated development cost (**EDC**) of more than \$50 million, the proposed development is State Significant Development (**SSD**) pursuant to Section 12 Warehouses or Distribution Centres of Schedule 1 of *State Environmental Planning Policy (Planning Systems) 2021* (**Planning Systems SEPP**).

The development comprises the development of a Storage and Distribution Warehouse within the Alspec Industrial Business Park (AIBP). The warehouse comprises of a two-level ancillary office with onsite parking and perimeter landscaping. A high-bay component is proposed at the western portion of the building.

The purpose of this report is to:

- Describe the project in simple terms,
- Analyse the feasible alternatives considered and identify the alternatives that will be investigated further in the EIS,
- Indicate early community views on the project and identify what engagement will be carried out during the preparation of the EIS, and
- Identify the key matters requiring further assessment in the EIS and the proposed approach to assessing each of these matters.

The following documents have been prepared to support the SEE:

- **Appendix A** Estimated Cost of Development (EDC) Report prepared by Napier and Blakeley.
- **Appendix B** Architectural Plans prepared by Nettleton Tribe.
- **Appendix C** Visual Impact Analysis Statement prepared by Geoscapes.
- **Appendix D** Dangerous Goods Assessment prepared by Riskcon.

1.1. APPLICANT DETAILS

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

Table 1 Applicant Details

Proponent	HB+B Property
Postal Address	55-59 Regent Street, Chippendale NSW 2008
ABN	84 604 992 458
Nominated Contact	Mike Lloyd mlloyd@hbbproperty.com.au

1.2. PROJECT OVERVIEW

Table 2 Site and Project Overview

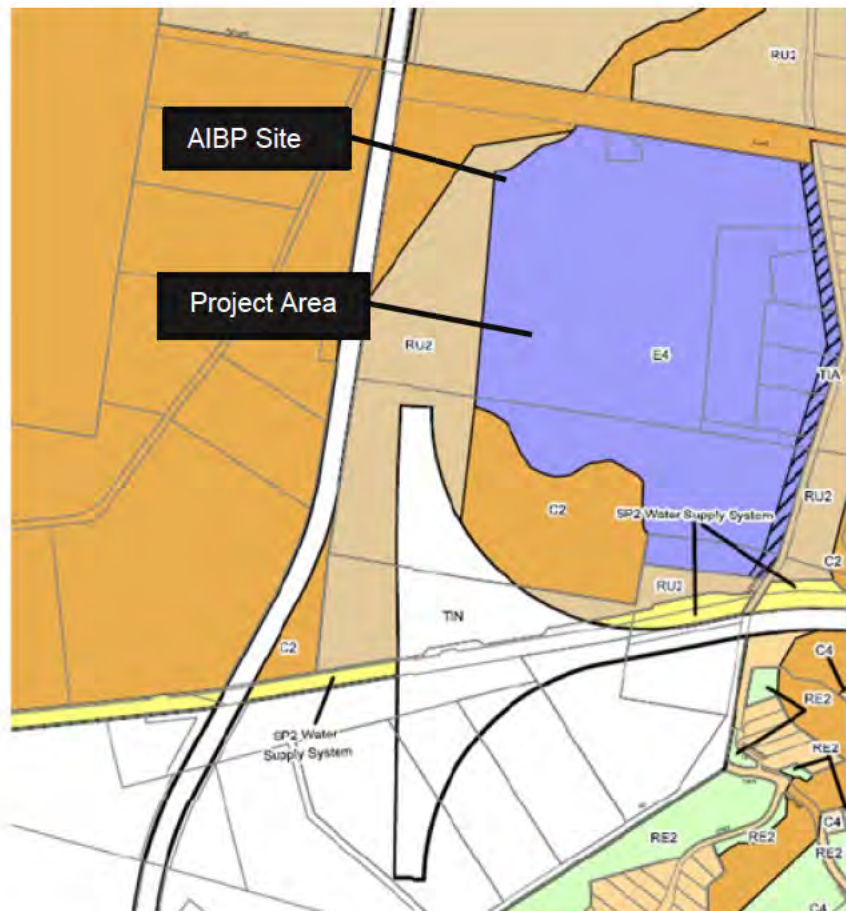
Matter	Description
The Site	Alspec Industrial Business Park
Country	Dharug Country
Street Address	221-235 Luddenham Road, Orchard Hills
Legal Description	Lot 1 DP 1293805
Site Area	104,959m ²
LGA	Penrith City Council
Existing development	No existing buildings or structures present on site.
The Project	
Project Objectives	▪ Deliver a high-quality, state-of-the-art storage and distribution warehouse. • Construction of a new warehouse within the Alspec Industrial Business Park (AIBP) to further unlock the economic opportunities of the area and establish itself as an industrial and employment hub leveraging its proximity to the Western Sydney Aerotropolis.
Project Description	Construction of a Storage and Distribution Warehouse within the AIBP comprising the following: ▪ Construction of a new warehouse with a two-level ancillary office. The warehouse is predominantly 14.7 metres in height, with a high-bay warehouse component at the western portion of the building which achieves a maximum height of 39 metres. ▪ A total building area of 45,512sqm; broken down as follows: – Warehouse area: 43,607sqm – Office Area: 1,905sqm ▪ Loading areas at the north and south sides of the warehouse, with hardstand surrounding the perimeter of the warehouse. Hardstand and carpark areas are accessed via four new driveways from the AIBP internal estate road. ▪ Provision of vehicular parking onsite to accommodate cars, vans, semi-trailers and B-doubles. It is envisaged that approximately 329 spaces will be provided on site within the proposed hardstand and carparking areas. • Perimeter landscaping and tree planting, as well as a permeable carparking area with a total area of 7,673sqm.

Figure 2 Planning Proposal – Proposed Land Zoning Map

Land Zoning Map - Sheet LZN_014

Zone

C1	National Parks and Nature Reserves
C2	Environmental Conservation
C3	Environmental Management
C4	Environmental Living
E1	Local Centre
E2	Commercial Centre
E3	Productivity Support
E4	General Industrial
MU1	Mixed Use
R1	General Residential
R2	Low Density Residential
R3	Medium Density Residential
R4	High Density Residential
R5	Large Lot Residential
RE1	Public Recreation
RE2	Private Recreation
RU1	Primary Production
RU2	Rural Landscape
RU4	Primary Production Small Lots
RU5	Village
SP1	Special Activities
SP2	Infrastructure
SP3	Tourist
SP4	Enterprise
W1	Natural Waterways
W2	Recreational Waterways
DM	Deferred Matter
INF	SEPP (Industry and Employment) 2021
TIN	SEPP (Transport and Infrastructure) 2021
WPC	SEPP (Precincts - Western Parkland City) 2021
TIA	Transport Investigation Area (Refer to Clause 7.32)



Source: Penrith Council

2.1.2. Development Applications

The AIBP estate has several subsequent State and local development applications. A summary of each application is provided in the following table.

Table 3 Previous Development Consents

Development Application	Description	Status
AIBP Bulk Earthworks	DA24/0294 Integrated Development for Bulk Earthworks and Subdivision into Nine Lots, Including Dam Dewatering, Vegetation Removal, New Roads, Landscaping, Utilities, and Basins. Site Includes 221-227 and 289-317 Luddenham Road.	Assessment - Responding to RFI's
Alspec Manufacturing Warehouse	SSD-69845208 Construction and operation of a manufacturing warehouse and distribution facility, including an aluminium extrusion and paint line, within the Alspec Industrial Business Park.	Response to Submissions
Cope Sensitive Freight	DA24/0330 The construction and operation of a single warehouse building with a total gross floor area (GFA) of 38,500 sqm, proposed for COPE Sensitive Freight on a single landholding within the Alspec Industrial Business Park (AIBP) development and is intended to be operated as a storage facility for bulky goods and fragile products.	Response to Submissions

Development Application	Description	Status
Lot 2 Speculative	DA24/0677 Construction and operation of a single warehouse building with a total gross floor area (GFA) of 15,326 sqm, with associated site preparation works, hardstand areas, car parking, landscaping, and an underground OSD tank.	Under Assessment
OSSM Facility	DA24/0654 The proposal seeks to develop an on-site waste disposal system comprising of 492m2 of underground tanks, 567m2 of above ground tanks and 648m2 of plant shed area. Together a total of 9 tanks are proposed onsite.	Response to Submissions

3. STRATEGIC CONTEXT

3.1. KEY FEATURES OF SITE AND SURROUNDS

An aerial image of the site is illustrated in Figure 2. Photographs of the current site condition are provided in Figure 3. The site is located directly north of land identified as a future Western Sydney freight line, east of the future North South Rail line and proposed M9 (Outer Sydney Orbital Corridor) and west of an existing industrial precinct. The site is optimally located at the junction of the Northern Gateway Precinct and the South Creek Precinct of the Western Sydney Aerotropolis.

The site comprises the project area for the proposed development which is situated within the central portion of the AIBP.

Figure 3 AIBP Aerial Map



Source: Nearmaps

Figure 4 Project Area within AIBP



Source: Urbis

Figure 5 Locality Photographs



Picture 1 View looking north towards undeveloped lot to the north of the site across Patons Lane.

Source: Google Maps



Picture 2 View looking east towards residential properties east of the site, across Luddenham Road.

Source: Google Maps



Picture 3 View of the property immediately south of the site, adjoining the AIBP.

Source: Google Maps



Picture 4 View looking south at the residential dwellings.

Source: Google Maps

The key features of the site which have the potential to impact or be impacted by the proposed development are summarised in the table below.

Table 4 Key Features of Site and Locality

Descriptor	Site Detail
Land Configuration	The site is a regular shaped allotment with an area of 104,959 sqm. The site includes a single allotment.
Surrounding Land Use	The site is bounded by Luddenham Road to the east, and Patons Lane to the north. The proposed corridor for the Outer Sydney Orbital forms the western boundary of the Business Park. The surrounding locality is described below: ▪ North: The surroundings north of the site are predominantly rural residential and agricultural facilities. The Erskine Park Fire Service

Descriptor	Site Detail
	and Dogs NSW are also located to the north-east. The Western Motorway (M4) is located further north of the site accessed via the Luddenham Road and Mamre Road connection. South Creek flows north-south, with a tributary connection beginning north of the site and breaking away to the west. ▪ East: The eastern boundary divides its interface with Luddenham Road (northern half) and several properties (southern half). These include agricultural, community and cultural uses relating to the Bosna Croatian Club, a plant nursery and Luddenham Oval. Further east across Luddenham Road are several rural residential dwellings and South Creek, a major creek line. ▪ South: Immediately south of the site are more residential dwellings. Further south is the Northern Gateway Precinct of the Western Sydney Aerotropolis. ▪ West: To the west of the site is an environmental conservation zone which is adjacent to a tributary of South Creek. To the north west of the site is a waste management service relating to a recycling and landfill centre.
Site Access and road network	The AIBP site currently has a vehicular access point from Luddenham Road. Patons Road will be upgraded and is the subject of a future application with Penrith Council which will be lodged in 2025.
Easements and Covenants	There are no easements and covenants which affect the site.
Services & Utilities	Some existing utilities are available to service the site, including potable water and electricity.
Contamination	A Preliminary Site Investigation (PSI) has previously been prepared for the site as part of the Planning Proposal. The report details all structures and buildings have been removed from the site. Any sources of contamination or potentially hazardous materials were identified and the site has been made suitable from a contamination perspective for the proposed works.
Stormwater and Flooding	The site is not identified as being affected by the flood planning area. However, there is surrounding flood impacts occurring within the broader AIBP.
Bushfire Prone Land	The site is identified as being bushfire prone land and affected by Vegetation Category 3.
Biodiversity	The site is predominantly grassed, with some scattered trees.
Aboriginal Heritage	An Aboriginal Cultural Heritage Assessment (ACHA) has previously been prepared for the site as part of the Planning Proposal. It identified two key locations across the entire AIBP site consisting of higher densities of stone artefact materials. Both sites were considered of moderate significance with the excavated assemblage suggesting brief/intermittent visitation over the last 5,000 years and having research potential for further understanding of past activity and behaviour.
European Heritage	The site is not identified as a local heritage item, nor is it located within a heritage conservation area. However, the site is in proximity to a heritage item to the east, specifically: ▪ Item 843: Luddenham Road Alignment.

3.2. PROJECT JUSTIFICATION

Table 5 Strategic Context

Plan	Consistency
Greater Sydney Region Plan	The <i>Greater Sydney Region Plan (Region Plan)</i> 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 proposed development will deliver industrial employment land to support the economic growth of the region. This is through the creation of construction and operational jobs that will help contribute to the regional job targets. ▪ <i>Objective 15 The Eastern, GOP and Western Economic Corridors are better connected and more competitive.</i> ▪ <i>Objective 16: Freight and logistics network is competitive and efficient.</i> ▪ <i>Objective 20 Western Sydney Airport and Badgerys Creek Aerotropolis are economic catalysts for Western Parkland City.</i> ▪ <i>Objective 23 Industrial and urban services land is planned, retained and managed.</i>
Western District Plan	The <i>Western City District Plan (District Plan)</i> 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 District Plan contains strategic directions, planning priorities and actions that seek to implement the objectives and strategies within the Region Plan at the district-level. The Structure Plan identifies the key centres, economic and employment locations, land release and urban renewal areas and existing and future transport infrastructure to deliver growth aspirations. The delivery of a high-quality warehouse will generate employment opportunities to existing and future residents of the district. The proposed land uses are compatible with the employment lands identified in the area and will help support the function and operations of the future airport. ▪ <i>Planning Priority W6 Creating and renewing great places and local centres, and respecting the District's heritage</i> ▪ <i>Planning Priority W8 Leveraging industry opportunities from the Western Sydney Airport and Badgerys Creek Aerotropolis</i> ▪ <i>Planning Priority W10 Maximising freight and logistics opportunities and planning and managing industrial and urban services land.</i> ▪ <i>Planning Priority W11 Growing investment, business opportunities and jobs in strategic centres.</i>
Penrith Local Strategic Planning Statement	The Penrith Local Strategic Planning Statement was published by Penrith City Council in March 2020 and provides an overview of the Penrith LGA as well as setting out the 2036 vision for the Penrith, anchored on the key themes of connected, healthy, innovative and balanced. The site is situated close to the State-nominated Orchard Hills Urban Investigation Area. In addition, the WSA is catalyst to the emergence of a significant economic corridor that supports diverse industries and a range of job opportunities. The proposed warehouse and future AIBP will help support this emerging trade and investment hub by offering freight and industrial activities to service the future industries. It will also contribute to the economic development of the LGA through its job creation.

Plan	Consistency
	▪ <i>Planning Priority 1: Align development, growth and infrastructure.</i> ▪ <i>Planning Priority 11: Support the planning of the Western Sydney Aerotropolis.</i> ▪ <i>Planning Priority 12: Enhance and grow Penrith's economic triangle.</i>
Penrith Employment Lands Strategy	Penrith City Council's Employment Lands Strategy (ELS) 2021 aims to guide the development of employment lands within the LGA, in order to strengthen the economic development and resilience of Penrith. The Strategy is a response to Action 12.1 of the LSPS under Planning Priority 12 to 'Enhance and grow Penrith's Economic Triangle'. The Employment Lands Strategy also responds to the Western City District Plan's 6 principles to 'retain and manage' existing employment lands, and to 'plan and manage' new employment lands. The ELS recognises the significant state-wide economic benefits associated with industrial and urban services land and their importance in ensuring the effective functioning of urban area. It identifies the existing function of land within Penrith's Economic Triangle, noting that land within the north-south corridor will form a new enterprise arc from St Marys to the Western Sydney Airport and Aerotropolis. The site located within the north-south corridor benefits from connections to Mamre Road and future connections along the Sydney Metro WSA rail line and the Outer Sydney Orbital. The ELS identifies future employment lands as well as new precincts with potential to strengthen the diversity of the LGA's economic function and provide critical employment. The ELS recognises the potential of Penrith Lakes, Orchard Hills urban investigation area and the Broader WSEA. Accordingly, the site located within the Orchard Hills urban investigation area will help support the short-term and medium-term demand for jobs, of which are not expected to be met should land continue to be developed at the rate of which it has occurred previously.

3.3. CUMULATIVE IMPACTS WITH FUTURE PROJECTS

The site is located within the Orchard Hills wider area within the suburb of Penrith. The surrounding land includes rural residential properties and agricultural uses. Approved and likely future developments which may be relevant in the cumulative impact assessment of the proposal are summarised in the following table.

Table 6 Nearby Projects

SSDA Reference	Development Description	Current Status
SSD-7173	<u>Altis Warehouse Facility</u> Subdivision of the site to create nine industrial allotments and the development of three warehouse buildings with ancillary office space. The development of an internal access road from Mamre Road and intersection works between Mamre Road and an internal estate road.	Approved (15/12/2016)
SSD-9429	<u>Snack Brands Warehouse Facility</u> Construction and operational use of a Warehouse and Distribution Facility also include an internal estate road, ancillary hardstand, amenities and office space, all of which would be constructed to support the use and associated infrastructure and civil works required across the Site.	Approved (05/04/2019)
SSD-18204994	<u>Snack Brands Manufacturing Facility</u>	Approved (08/07/2022)

SSDA Reference	Development Description	Current Status
	<u>Construction and operation of a chips/snack foods manufacturing facility to connect to the existing adjoining Snack Brands Warehouse and Distribution facility.</u>	
MP09_0074	<u>Orchard Hills Waste Facility</u> Develop and operate a waste and resource management facility on a 60ha property.	Approved (12/07/2012)
SSD-45510464	<u>BlueScope Erskine Park Metal Coating Line 7</u> Construction and operation of a metal coating line with a processing capacity of 240 kilo tonnes per annum (ktpa) of cold rolled coil including despatch building, three stacks, storage areas, office and laboratory.	Approved (15/09/2023)
SSD-7075	<u>Mod-5 Erskine Park Waste Facility Modification 5</u> Update waste stored at any given time from 1,040 tonnes to 3,000 t, processing up to 35,000 tpa of glass, and update site layout by removing the manual sort line and replacing with the glass breaking line.	Approved (07/07/2023)
MP09_0074	<u>Mod-2 MOD 2 - Integrated Water and Leachate Plant Modifications</u> Construction of a Leachate Treatment Plant and a Recycling Water Treatment Plant.	Approved (27/06/2023)
SSD-10101987	<u>Kemps Creek Data Centre Construction and Operation of a Data Centre</u> including two data storage buildings, 61 generators, substation, high voltage switch yard, 30 diesel storage tanks, office, internal access roads and landscaping.	Approved (12/07/2023)
SSD-10272349	<u>Yiribana Logistics Estate GPT</u> Concept plan and Stage 1 DA for an industrial estate. Stage 1 comprises two warehouses, site-wide bulk earthworks and retaining walls, an internal road network, storm water works, car parking, signage and landscaping.	Approved (22/09/2023)
SSD-30628110	<u>Summit at Kemps Creek - 706-752 Mamre Road (Mirvac)</u> A Concept Proposal comprising nine buildings with a total gross floor area (GFA) of up to 244,413 square metres (m2) and Stage 1 development of three buildings with a total GFA of 79,263 m2.	Response to Submissions
SSI-10051	<u>Sydney Metro - Western Sydney Airport</u> A new metro line to service Western Sydney International (Nancy-Bird Walton) Airport, the Western Sydney Aerotropolis and interchanging with the T1 Western Line at St Marys.	Approved (23/07/2021)

The potential cumulative impacts of the project will be addressed in the EIS in accordance with the DPHI *Assessing Cumulative Impacts* guidelines.

3.4. AGREEMENTS WITH OTHER PARTIES

The applicant has already entered into Voluntary Planning Agreement for the site with Penrith Council for the delivery of key road infrastructure. No further agreements will be required for this SSDA.

4. PROJECT

This section outlines the key features of the proposed development, including the project area, the conceptual physical layout and design (including likely mitigation measures), the main land use activities and the likely timing for delivery of the project.

It also includes a high-level review of feasible alternatives which were considered having regard to the project objectives outlined in Section 1.3 of this report, including the consequences of not carrying out the development.

4.1. PROPOSED DEVELOPMENT

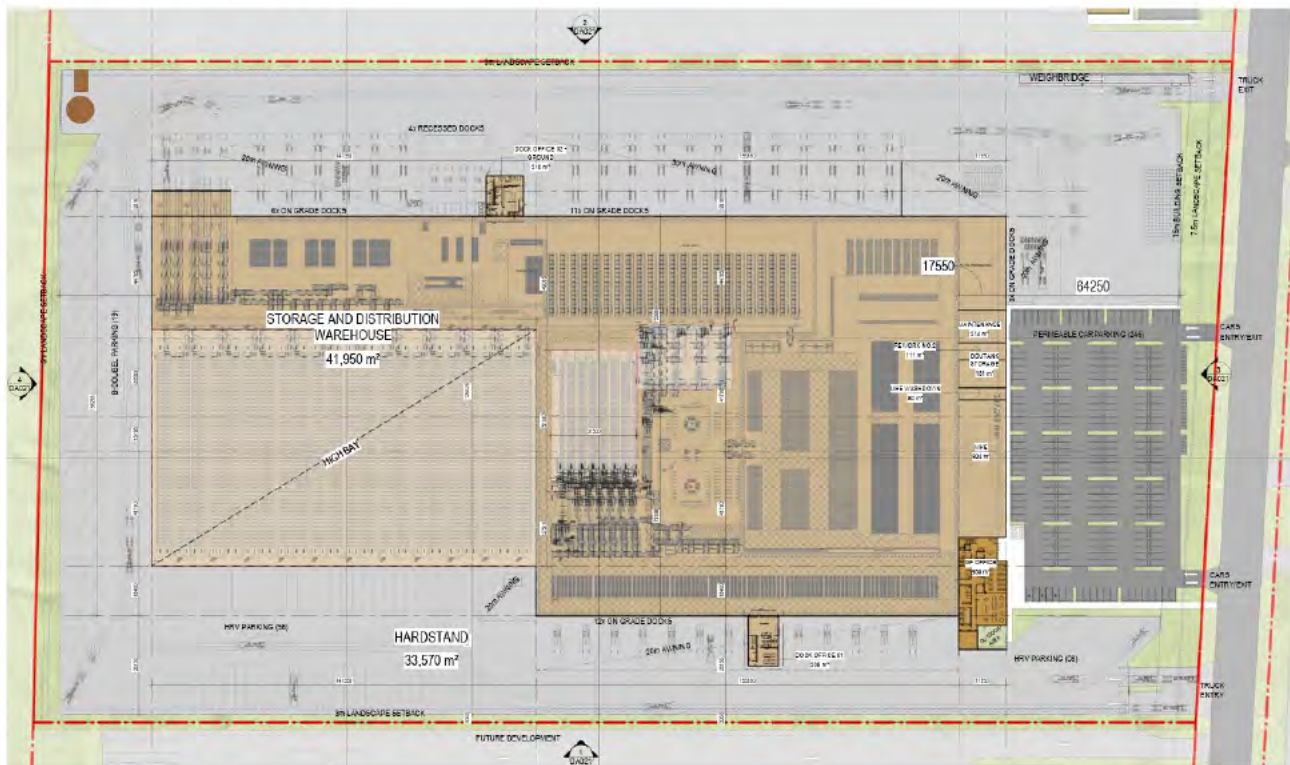
The Proposal seeks approval for the construction and operation of a new warehouse, to be used as a beverage Storage and Distribution Warehouse within the AIBP. Specifically, the project comprises the following:

- Construction of a new warehouse with a two-level ancillary office. The warehouse is predominantly 14.7 metres in height, with a high-bay warehouse component at the western portion of the building which achieves a maximum height of 39 metres.
- A total building area of 45,512sqm; broken down as follows:
 - Warehouse area: 43,607sqm
 - Office Area: 1,905sqm
- Loading areas at the north and south sides of the warehouse, with hardstand surrounding the perimeter of the warehouse. Hardstand and carpark areas are accessed via four new driveways from the AIBP internal estate road.
- Provision of vehicular parking onsite to accommodate cars, vans, semi-trailers and B-doubles. It is envisaged that approximately 329 spaces will be provided on site within the proposed hardstand and carparking areas.
- Perimeter landscaping and tree planting with a total area of 10,236sqm (10%).

The proposed architectural plans have been prepared by Nettleton Tribe at **Appendix B** and shown in **Figure 4** and **5**.

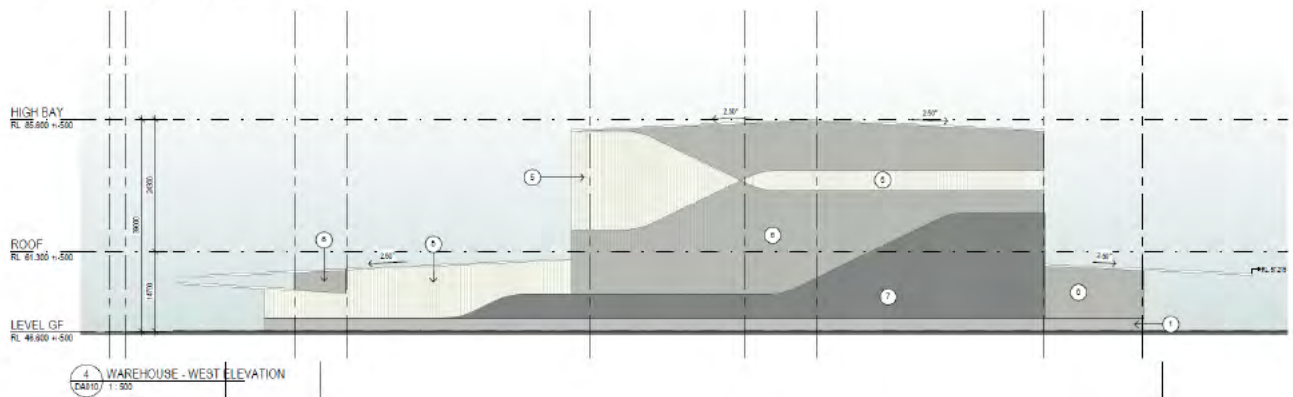
The proposed building heights are 14.7m and 39m (high-bay component). This exceeds the maximum building height control of 24m and therefore a clause 4.6 variation request will be prepared as part of the EIS. The request will assess and justify the variation to the Local Environmental Plan height limit, which has been discussed with Penrith City Council and was supported for the purposes of the assessment.

Figure 6 Proposed Site Plan



Source: Nettleton Tribe

Figure 7 Proposed Elevation



Source: Nettleton Tribe

Figure 8 Proposed AIBP Master Plan



Source: Nettleton Tribe

4.2. FEASIBLE ALTERNATIVES

Section 192 of the *Environmental Planning and Assessment Regulation 2021* (the Regulation) requires an analysis of any feasible alternatives to the proposed development, including the consequences of not carrying out the development.

The Applicant identified three project alternatives which were considered in respect to the identified need for the proposed concept plan and warehouses. Each of these options is listed and discussed in the following table.

Table 7 Analysis of Feasible Alternatives

Option	Comment
Option 1 – Consequences of not carrying out the development.	The consequences of not carrying out the development would undermine the strategic objectives of the Penrith LSPS, the Aerotropolis, relevant Metropolitan and District Plan objectives and significant public infrastructure investment by Federal, State and local government to support Western Sydney. Maintaining the site in its current state overlooks the site's inherent opportunities, such as its proximity to the Northern Gateway of the Aerotropolis and employment lands as identified in the LSPS. It would result in its underutilisation, overlooking its potential to contribute meaningfully to the community, industrial lands supply and employment opportunities.
Option 2 – Alternate land uses	The site could be developed for other employment and industrial land uses permissible within the E4 General Industrial zone. However, given the vision for the AIBP and the planned development surrounding the site, it would be incompatible to introduce higher order employment or light industry land uses.
Option 3 – Proposed Development	The proposed warehouse and logistics estate is considered the most appropriate and feasible option for the site. The site will form part of the larger AIBP, which is strategically located within the Orchard Hills Urban Investigation Area and in proximity to the WSI. The site will benefit from co-location to other warehouses within the AIBP, which will support business activity in Penrith and Western Sydney. The proposal is compatible with the local context and will result in minimal impacts to the environment through the implementation of suitable mitigation measures where required. The development can be achieved without having unacceptable environmental impacts in relation to traffic, noise, heritage, biodiversity and visual impacts.

5. STATUTORY CONTEXT

This section of the report provides an overview of the key statutory requirements relevant to the site and the project, including:

- *Commonwealth Environment Protection and Biodiversity Conservation (EPBC) Act 1999*
- *NSW Biodiversity Act 2016 (BC Act);*
- *Environmental Planning and Assessment Act 1979 (EP&A Act);*
- *Environmental Planning Assessment Regulation 2021 (the Regulations);*
- *State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP);*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&I SEPP);*
- *State Environmental Planning Policy (Resilience and Hazards) 2021 (R&H SEPP);*
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021 (B&C SEPP);*
- *State Environmental Planning Policy (Industry and Employment) 2021 (I&E SEPP);*
- *State Environmental Planning Policy (Sustainable Buildings) 2022 (SB SEPP)*
- *State Environmental Planning Policy (Precincts – Western Parkland City) 2021 (WPC SEPP)*
- *Penrith Local Environmental Plan 2010*
- *Penrith Development Control Plan 2014: E17 Luddenham Road Industrial Business Park*

The following table categorise and summarises the relevant requirements in accordance with the DPHI guidelines. Each of these matters will be addressed in further detail within the future EIS.

5.1. STATUTORY REQUIREMENTS

The following table categorises and summarises the relevant requirements in accordance with the DPIE *State Significant Development Guidelines*.

Table 8 Identification of Statutory Requirements for the Project

Statutory Relevance	Action
Power to grant approval	Section 12 Warehouses or Distribution Centres of Schedule 1 of the Planning Systems SEPP sets out that development which has an estimated development cost of more than \$50 million is SSD. Estimated cost of development (refer to Appendix A) \$218,108,101 (Excl. GST) The proposed development is appropriately classified as SSD.
Permissibility	The site is zoned E4 General Industrial in accordance with the Penrith LEP. Warehouse or Distribution Centres are permitted with consent in the E4 Zone.
Other approvals (General)	The following Acts were considered but by virtue of the application being SSD and the nature of the proposal, no further approval is required under the following: <i>NSW National Parks & Wildlife Act 1974;</i> <i>NSW Heritage Act 1977;</i> <i>NSW Roads Act 1973;</i> <i>NSW Water Management Act 2000;</i> <i>NSW Rural Fire Service Act 1997;</i> and <i>NSW Protection of the Environment Operations Act 1997.</i>

Statutory Relevance	Action
	No requirements for other approvals have been identified at this stage.

5.2. PRE-CONDITIONS

Table 9 outlines the pre-conditions to exercising the power to grant approval which are relevant to the project.

Table 9 Pre-Conditions

Pre-conditions to Granting Consent	Comment
Section 4.24 of the EP&A Act – Concept Development Consent	Determination of any further development application in respect of the site cannot be inconsistent with the consent for the concept proposal for the development of the site. A concept consent does not apply to the site.
Section 66 of the EP&A Regulations – Contribution plans for certain areas of Sydney	Under s66 a development must not be determined by the consent authority unless a contributions plan has been approved for the land. A contribution is not required if the applicant has entered into a planning agreement with a planning authority under Part 7 of the Act for the matters that may be the subject of a contributions plan. The site is not located in land specified under this section. Notwithstanding, the applicant has entered into an agreement with Penrith City Council for a Voluntary Planning Agreement (VPA) which seeks to deliver the Luddenham Road widening, upgrading of Patons Lane and a signalised intersection to Luddenham Road. The VPA has been executed and is now registered on title.
State Environmental Planning Policy (Transport and Infrastructure) 2021	Clause 2.122 requires the consent authority to refer development for Warehouse and Distribution centres with a site area / GFA greater than 8000sqm with access to any road to Transport for NSW.
State Environmental Planning Policy (Resilience and Hazards) 2021	A consent authority must be satisfied that the land is suitable in its contaminated state - or will be suitable, after remediation - for the purpose for which the development is proposed to be carried out. Hazardous and Offensive Development is considered to assess the development against storage and transport thresholds for Dangerous Goods. Riskcon has provided preliminary advice (Appendix D) on the proposed developments alcohol storage which demonstrates the quantity of dangerous goods to be stored is significantly below the threshold triggers.
State Environmental Planning Policy (Sustainable Buildings) 2022	Chapter 3 Standards for non-residential development applies to the site. ▪ Section 3.2 Development consent for non-residential development ▪ Section 3.3 Other considerations for large commercial development ▪ Section 3.4 Other considerations for certain State significant development

5.3. MANDATORY CONSIDERATIONS

Table 10 outlines the relevant pre-conditions to exercising the power to grant approval and the section where these matters are addressed within the EIS.

Table 10 Mandatory Considerations

Statutory Reference	Mandatory Consideration
Consideration under the EP&A Act and Regulations	
Section 1.3	The relevant objects of the EP&A Act will be addressed in the EIS

Statutory Reference	Mandatory Consideration
Section 4.15 (1)(a)(i) Relevant environmental planning instrument	All relevant EPIs will be addressed in the EIS, these include; ▪ Penrith LEP 2010 ▪ Resilience & Hazards SEPP 2021 – Hazardous and Offensive Development ▪ Resilience & Hazards SEPP 2021 – Remediation of Land ▪ Planning Systems SEPP ▪ Transport & Infrastructure SEPP ▪ Industry & Employment SEPP ▪ Sustainable Buildings SEPP
Section 4.15 (1)(a)(ii) Relevant draft environmental planning instrument	▪ Not applicable.
Section 4.15 (1)(a)(iii) Relevant development control plan	Consistency with the Penrith Development Control Plan 2014: E17 Luddenham Road Industrial Business Park will be considered in the EIS.
Section 4.15 (1)(a)(iiia) any planning agreement or draft planning agreement	Not applicable.
Section 4.15(1)(b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,	The likely impacts of the development have been identified in Section 7 of this scoping report including those matters requiring further assessment in the EIS.
Section 4.15(1)(c) The suitability of the site for the development	An assessment of the suitability of the site will be undertaken within the EIS including whether the proposal fits within the locality and whether the site attributes are conducive to the proposed development.
Section 4.15(1)(d) Any submissions made in accordance with the Act or regulations	Early engagement will be undertaken with the community and agencies to ensure that the views are appropriately considered and detailed in the EIS. A detailed response to any submissions will be provided following lodgement and public exhibition of the EIS.
Section 4.15(1)(2) The Public Interest	The public interest of the project will be fully detailed and addressed within the EIS. Given the alignment of the project with Federal, State and local strategic policy it is considered that the project is in the public interest.
Mandatory relevant considerations under EPIs	
Penrith LEP 2010	The Penrith LEP is the principal environmental planning instrument that that sets out land use zones and development controls for the site. The Penrith LEP includes the following relevant considerations that will be fully addressed in the EIS. ▪ Part 4 – Principal development standards ▪ Part 5 – Miscellaneous provisions ▪ Part 7 – Additional local provisions The project is generally consistent with the provisions of the LEP.
State Environmental Planning Policy (Resilience and Hazards) 2021	Chapter 3 – Hazardous and Offensive Development will be considered and assessed as part of this application. Preliminary advice has been prepared by Riskcon (Appendix D) to confirm the storage of Dangerous Goods does not exceed chemical storage thresholds. The proposed storage and distribution warehouse will be assessed for the storage of hazardous goods in which the EIS will assess the type, quantities and packaging relating to hazardous goods being stored on site. At this stage, the following details are provided: <i>The Fire and Sprinkler systems will be designed to suit specific product classifications outlined by the tenant and required standards. A detailed</i>

Statutory Reference	Mandatory Consideration
	<i>product manifest will be assessed within the Preliminary Hazard Analysis. Storage of goods including dangerous goods will be protected by the appropriate systems including:</i> <i>• Fire Sprinkler Systems.</i> <i>• Suppression mode sprinklers considering the automated storing and staging requirements.</i> <i>• Fire Hydrant and Hose Reels.</i> <i>• Potable Fire Extinguishers.</i> <i>• Fire Detection / Alarm Systems.</i> <i>• Appropriate In Rack Sprinklers as required.</i> <i>• Sufficient system interface with base build systems including extraction fans.</i> <i>The above systems will be utilised and integrated within the fit out locations noted below:</i> <i>• Racking and Highbay Racking.</i> <i>• Block Stacking.</i> <i>• Automation and conveyors as required.</i> <i>• Sortation and Plant Equipment as required.</i> <i>• MHE Charging locations.</i> <i>• Office and General Warehouse Areas.</i> <i>• Awnings</i> Section 4.6 – Contamination and remediation to be considered in determining development application. All structures and buildings have been removed from the site. Any sources of contamination or potentially hazardous materials were identified, and the site has been made suitable from a contamination perspective for the proposed works.
State Environmental Planning Policy (Transport and Infrastructure) 2021	Section 2.122 – Traffic-generating development applies as the site area exceeds 8,000sqm and the proposal is to be referred to TfNSW. A Traffic impact Assessment will be prepared to assess the potential traffic and parking impacts.
State Environmental Planning Policy (Biodiversity and Conservation) 2021	Chapter 2 – Vegetation in non-rural areas will be considered within the SSDA.
State Environmental Planning Policy (Industry and Employment) 2021 (I&E SEPP)	All signage will be required to consider the Schedule 5 criteria under the Industry & Employment SEPP. Signage details will be included in the SSDA.
Considerations under other legislation	
Biodiversity Conservation Act 2016 Part 7 and Part 8 (2) (BCA)	The site is biodiversity certified under the Cumberland Plain Conservation Plan. The likely impact of the proposed development on biodiversity values as assessed in the Biodiversity Development Assessment Report (BDAR). The Minister for Planning may (but is not required to) further consider under that BC Act the likely impact of the proposed development on biodiversity values. The likely impacts of the proposed development on biodiversity values will be assessed in a BDAR which will accompany the EIS unless a BDAR waiver is sought and granted for the proposal.
Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)	Chapter 2 of the EPBC Act establishes controls for assessing and regulating the environmental impact of activities (including development) where a Matters of National Environmental Significance (MNES) may be affected. Under the EPBC Act, any action which has, will have, or is likely to have a significant impact on MNES is defined as a "controlled action" and requires approval from the relevant Commonwealth Minister. Assessment of significance is not required in accordance with the Significant Impact Guidelines 1.1 – Matters of National Environmental Significance published by the Commonwealth Department of Agriculture, Water and the Environment (DAWE).

Statutory Reference	Mandatory Consideration
	A biodiversity assessment will be submitted as part of the EIS and will be included an assessment against the requirements of the EPBC Act.
Water Management Act 2000	Section 91 of the Water Management Act regulates two kinds of activities, controlled activity approvals and aquifer interference approvals; Whilst a water use approval, a water management work approval or controlled activity approval other than an aquifer interference approval, which confers a right to carry out specified aquifer interference activities is not required for SSD, Nevertheless, guidelines for Controlled Activities on Waterfront Land; and NSW Aquifer Interference Policy, 2012 will be considered in the EIS and supporting documentation
Rural Fires Act 1997	Planning for Bushfire Protection (NSW Rural Fire Service 2018) will be considered in the assessment provided within the EIS.
Roads Act 1993	Section 138 regulates works and structures in, on or over a public road including requirements for concurrence from TfNSW. The Guide for Traffic Generating Developments will be considered as part of the Transport Assessment for the project and assessed within the EIS.
Development Control Plan	
Penrith Development Control Plan 2014	Clause 2.10(1) of the Planning Systems SEPP provides that the provisions of Development Control Plans do not apply to SSD. Clause 2.10(2) of the Planning Systems SEPP provides that a requirement of an EPI that a DCP be prepared before development can be granted to development does not apply to SSD. There is no requirement for assessment of the project against the Penrith DCP. The requirement of Penrith LEP for a DCP to be prepared prior to consent being granted has no effect. Nevertheless, the project has considered the following provisions of Penrith DCP: ▪ Part C City-wide controls ▪ Part D Land use controls ▪ Part E Key precincts

6. COMMUNITY ENGAGEMENT

The following sections of the report describe the engagement activities that have already been carried out for the project, and the engagement to be carried out during the preparation of the EIS.

6.1. ENGAGEMENT CARRIED OUT

The proposed development reflects discussions with the following key agencies:

Table 11 Agency Engagement

Agency	Engagement
Penrith City Council	An introductory meeting with Penrith City Council was completed to discuss the project and the intention of preparing a SEARs Request.
DPHI	Initial discussions have commenced with DPHI to describe the project and the preparation of a Scoping Request.

- All comments received through this process have been reflected in the Scoping Report and Architectural Plans. Once the SEARs are received, the Applicant will proceed with the formal consultation process as part of preparing the EIS, as detailed in Section 5.2 below.

6.2. FUTURE ENGAGEMENT TO BE CARRIED OUT BY THE APPLICANT

Further community and stakeholder consultation will be undertaken in the preparation and assessment of the EIS including:

- **Key Stakeholders:** it is proposed to consult with the following stakeholders during the preparation of the EIS:
 - Penrith City Council
 - Surrounding residents, businesses and local community groups.
- **Other Interested Stakeholders:** additional stakeholders may be identified during the preparation of the EIS.
- **Key Actions:** the following actions will be undertaken to keep the community informed regarding the project, obtain feedback from the community on the project and engaged with stakeholders on the detailed assessment of key matters:
 - A dedicated engagement strategy will be prepared following the issue of SEARs.
 - Additional consultation actions may be identified following further engagement with key stakeholders and DPHI.
 - The EIS and supporting documentation will be placed on public exhibition, providing stakeholders with an additional opportunity to review the Project, including the final development plans and the detailed specialist studies and assessment reports accompanying the final EIS.
- The proposed actions are consistent with the community participation objectives in the Undertaking Engagement Guidelines for State Significant Projects. An engagement consultant will be responsible for monitoring, reviewing and adapting the effectiveness of the engagement strategy to encourage community participation in the Project.
- An Engagement Outcomes Report will be provided with the EIS.

7. PROPOSED ASSESSMENT OF IMPACTS

This section identifies the key impacts which will be further investigated and assessed within the EIS, including the proposed approach to assessing each of these matters. It also identifies the matters addressed in the scoping phase that are unlikely to result in significant impacts and do not warrant further consideration in the EIS.

7.1. MATTERS REQUIRING FURTHER ASSESSMENT IN THE EIS

The following table outlines the relevant matters and impacts which will be addressed in detail within the EIS. It outlines the matters and impacts of particular concern to the community and other stakeholders.

Table 12 Matters requiring assessment in the EIS

Matter	Consideration
Urban Design and Landscaping	The SSDA will include an urban design and landscaping report to ensure the proposal is of a high quality and landscape led design. The project will be aiming provide a high-quality landscaped outcome on the site that will maximise tree canopies to optimise shade and reduce urban heat island effects.
Amenity	The SSDA will need to address key environmental amenity matters to ensure the project can provide a high-quality outcome with strong liveability attributes. Key technical studies to inform the EIS will (if required) include overshadowing diagrams; noise and vibration impact assessment, visual impact assessment; or public domain and landscape strategy.
Noise & Vibration	The proposed development is expected to have acoustic, and vibration impacts as well as cumulative impacts in relation to surrounding large-scale developments. A Noise and Vibration Impact Assessment (NVIA) will accompany further assessment of this matter in the Environmental Impact Statement (EIS), to satisfy the Environmental Protection Authority's (EPA's) Noise Policy for Industry, Interim Construction Noise Guideline and Road Noise Policy. Mitigation, management, and monitoring measures will be documented and implemented over the demolition, construction, and operation of the site.
Visual	Visual impact will be assessed in the EIS. As a part of this, impacts on viewpoints and vistas will be assessed as well as visual amenity assessment of landscaping, design and supporting works. The Visual Impact Assessment (VIA) will include an assessment at suitable intervals from construction (e.g. 0, 5, 10 years) to demonstrate the appearance of the development prior to and following the establishment of landscaping. The site's proposed use is suitable in terms of visual amenity. A Visual Analysis Scoping Report has been prepared by Geoscapes to assess the potential impacts generated by the proposed development. Six viewpoints were assessed, of which only two viewpoints were found to have medium-high levels of sensitivity. Only the high-bay portion of the building will be visible, as the lower parts will be screened from view by future development and landscaping. In addition, in the medium term when the AIBP development is constructed and the E4 zoned land adjacent to Luddenham Road is completed the proposed storage and distribution warehouse will be fully screened from view from many locations. Further analysis will be carried out in the Visual impact Assessment as part of the EIS. A clause 4.6 variation of development standard assessment will be included in the EIS. This will assess and justify the variation to the Local Environmental Plan height limit of 24m for the high bay component of the proposal which will be 39m. The preliminary Visual Impact assessment, appended to this report has found no significant visual impacts associated with the high bay component of the development. The use of the clause 4.6 approach has been discussed with Penrith City Council and was supported for the purposes of the assessment.
Air Quality	An air quality analysis and assessment will be undertaken to consider air quality throughout the demolition, construction, and operational phases of development. Strategies to manage likely impacts such as dust emissions and suppression during construction will be further explored in the EIS.
Access & Transport	Increases in traffic are expected alongside the proposed development. A Traffic Impact Assessment (TIA) to assess key traffic considerations in relation to the site and its development will be obtained and evaluated in the EIS. Existing and estimated future traffic conditions, parking, and access as well as the impact on surrounding road capacity and pedestrian/cycling routes are all key features to be analysed.

Matter	Consideration
	Surrounding construction which has the potential to cause cumulative traffic impacts include AIBP Warehouses and upgrades to Luddenham Road and Patons Lane. Existing traffic volumes on surrounding roads will increase during construction and operation, and the impact of the site's proposed new roads will require further assessment and planning.
Water and Flooding	Analysis of the site's water and stormwater conditions will be included in the civil infrastructure report and plans. A Soil and Water Management plan (SWMP) will be acquired alongside the completion of an Erosion and Sediment Control Plan and Stormwater Management Strategy (SMS). These will help inform further site analysis in the EIS surrounding catchment capacity on and around the site as well as any irrigation risks. A Flood Impact Risk Assessment in accordance with the NSW Floodplain Development Manuel 2005 will be provided in the SSDA and analyse any further potential flood impacts on the site and surrounds.
Earthworks	Civil plans will be prepared to identify and manage any negative impacts as a result of the proposed bulk earthworks. It is expected that cut and fill works will be required across the site, the proposed earthworks will be informed by a detailed cut and fill strategy.
Geotechnical	A Geotechnical Report will provide an assessment of the ground conditions of the site and any risks associated with ground stability or proposed excavation. The report will detail the findings from desktop review of the site and borehole testing where necessary. The report will recommend appropriate temporary and permanent site support and retention measures if required. The Geotechnical Report will also assist to determine any required engineering and earthworks to achieve the proposed development outcome.
Bushfire	A Bushfire Strategy Study will be developed and inform the EIS in accordance with the NSW RFS' Planning for Bushfire Protection (2019). The site is largely located on Vegetation Category 2 bushfire prone land.
Waste	The proposed development is expected to generate waste during the demolition, construction, and operation phases. A Waste Management Plan (WMP) will be attained to determine the extent of management required and will be in accordance with waste regulatory frameworks and legislation.
Biodiversity	The site currently consists of rural vegetation in the form of grasses and scattered trees. Assessment in accordance with the Biodiversity Assessment Method will be undertaken in the EIS alongside the consideration of a Biodiversity Assessment Report (BAR). A further detailed ecological assessment of the site will occur to identify any threatened species and help inform the potential impacts of the proposal. Preparation of a BDAR is not required as the site is recognised as biodiversity certified via strategic biodiversity certification. The key environmental conservation area for the site has already been protected by a C2 Conservation zone as part of the rezoning.
Heritage	Consultation with Aboriginal Community representatives will be conducted and assessed in an Aboriginal Cultural Heritage Assessment Report (ACHAR) as part of the SSDA. In terms of European Heritage there a Heritage Impact Assessment will be undertaken.
Building Code of Australia	A BCA report will be prepared for the development and will present the findings of an assessment of the proposed building against the Performance Requirements of the Deemed-to Satisfy provisions of the Building Code of Australia. The assessment will also identify whether the development will rely on an Alternate Solution based assessment.
Access	An access report will be prepared for the development to ensure that disabled access can be provided in accordance with <i>Disability Discrimination Act 1992</i> . The access report will demonstrate how access for all users will be accommodated through the development.
ESD	An Ecologically Sustainable Development (ESD) Report will be prepared to provide a sustainability assessment development. The ESD report will provide an assessment of the building design and demonstrate ways in which the development can achieve best practice and compliance with sustainability requirements.

Matter	Consideration
Economic Impact Assessment	The economic impacts will be assessed and addressed in the EIS within an accompanying Economic Impact Assessment. The economic impact assessment will address the need for the proposed floorspace and its impacts by considering: ▪ Forecast growth in demand based on future population growth ▪ Existing supply and vacancy rate for employment lands ▪ Proposed supply of employment lands.
Hazards and Risks	A Preliminary Hazard Analysis Report will be prepared for the EIS to assess the types of dangerous goods which will be stored and how they will be mitigated in accordance with the Resilience and Hazards SEPP. The proposed development operations comprise the storage of alcohol which is considered a dangerous good as it is flammable under the Australian Dangerous Goods Code. Similarly, Protection of the Environment Operations Act 1997 No 156 specifies activities which may pose increased levels of environmental risk therefore requiring the premise to hold an Environmental Protection Licence (EPL). Under Schedule 1, the proposed development is considered a Chemical Storage facility and requires an EPL if it triggers the specified thresholds. Preliminary advice has been prepared by Riskcon (Appendix D) to assess the values of Dangerous Goods stored on site against the abovementioned thresholds. It confirmed the quantity is significantly below the threshold values which would trigger a designated development and the need for an EPL. This confirms the proposed development does not require an EPL for its operations as a beverage storage facility.
Social Impact	A Social Impact Assessment will be prepared assess the social consequences the project, namely the impacts on affected groups of people and on their way of life, life chances, health, culture, and capacity to sustain these. The SIA will address the positive and negative impacts associated with the project, as well as the measures to mitigate these impacts. The SIA will be prepared in line with the NSW Guidelines for Social Impact Assessments.
Community Engagement	An Engagement Outcomes Report will be provided as required by the SEARs. The Report will outline the engagement carried out to date, the outcomes of that engagement and how it has informed the proposal. The report will provide evidence of a transparent and collaborative engagement process. This document will be included in the Environmental Impact Statement (EIS) as part of the SSDA. The document will also outline: ▪ Issues raised by surrounding landowners & stakeholders. ▪ Project response to issues ▪ Proposed future community and stakeholder engagement based on the results of consultation.
VPA / Infrastructure Delivery and Staging Plan	The key considerations that need to be made during the infrastructure funding and delivery planning the site include: ▪ A staging of infrastructure delivery that enables the development of the site, while providing a commensurate amount of works in kind offsets against contributions obligations for each stage. ▪ Balancing local and state contributions obligation, potential works in kind, the compulsory monetary contributions for biodiversity and fair recognition of any surplus credits.

7.2. MATTERS REQUIRING NO FURTHER ASSESSMENT IN THE EIS

This section of the report identifies the following matters that do not require further assessment in the EIS. Each of these matters was considered within the scoping phase but considered unlikely to result in significant impacts that warrant further assessment.

- **Land contamination:** A Preliminary Site Investigation (PSI) has previously been prepared for the site. The report details all structures and buildings have been removed from the site. Any sources of contamination or potentially hazardous materials were identified, and the site has been made suitable from a contamination perspective for the proposed works.
- **Access- port/rail facilities:** The site is not within proximity to a port or approved rail facility. Future consideration will be given to the site strategic context, including future rail corridors within a separate section of the future EIS.

- **Hazard and Risks – Biosecurity, Coastal hazards, Land movement:** The site is not in a coastal area. The existing and proposed operations are not classified as hazardous or offensive development or a biosecurity risk.
- **Air – gas:** The proposed future operation does not emit any gases that warrant assessment such as greenhouse gas.
- **Amenity – odour:** The proposed future operation will not cause any anticipated odorous issues, and thereby does not warrant further assessment beyond the standard Air Quality assessment required by the SEARs.

8. CONCLUSION

This Scoping Report has outlined preliminary information regarding the proposed storage and distribution warehouse within the AIBP. The report has outlined preliminary information regarding the site and proposal, identified the relevant strategic and statutory context, summarised the approach to engagement with stakeholders and, identified the scale and nature of the impacts of the project.

As outlined in **Section 4.0**, the Proposal is declared State Significant Development under Schedule 1, Clause 29 of *State Environmental Planning Policy (Planning Systems) 2021*. We trust that the information detailed in this report is sufficient to enable the Secretary to issue SEARs for the preparation of an Environmental Impact Statement.

DISCLAIMER

This report is dated 19 March 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 HB+B Property (**Instructing Party**) for the purpose of Scoping 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).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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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 ESTIMATED DEVELOPMENT COST (EDC)

14 February 2025
File Ref.: 2748082343/AA-EDC

Industry Assessments Team
NSW Department of Planning Housing and Infrastructure
C/- HB+B Property
55 – 59 Regent Street
CHIPPENDALE NSW 2008

Dear Sir

**Alspec Industrial Business Park - Storage and Distribution Warehouse
Lot 1 DP 1293805, 221-235 Luddenham Road, Orchard Hills
Registered Quantity Surveyor's Estimated Development Cost (EDC) Report for SEARS
Lodgement**

Executive Summary

We have prepared an Estimated Development Cost (EDC), using NSW Government Planning Circular *PS 24-002 Changes to how development costs are calculated for planning purposes*, for the construction of a new warehouse with a two-level ancillary office. This includes a high-bay warehouse component at the western portion of the warehouse with loading areas at the north and south sides of the warehouse. The works also include all associated fit out works and external works.

Our **Estimated Development Cost (EDC)** is **\$218,108,101 (Excl GST)**.



Sydney
Melbourne
Brisbane

Adelaide
Perth
Singapore



An analysis of the estimated costs is summarised below for works:

ITEM		COST (EXCL. GST)
Demolition and Remediation		-
Construction Cost		\$ 75,339,529
Fixed & Mobile Plant & Equipment (If applicable)		-
Carrying Out of Works (If applicable)		-
Mitigation of Impact Items (If applicable)		-
Furniture, Fittings & Equipment (FFE) & Operational Equipment (Where forming part of the application)		\$ 109,000,000
Fitout costs (Where forming part of the application)		\$ 5,564,148
Sub-total - 1		\$ 189,903,677
Add: Professional Fees	(5.0%)	\$ 9,495,184
Add: Contingency	(5.0%)	\$ 9,495,184
Add: Escalation	(4.5%)	\$ 8,615,904
Sub-total - 2		\$ 217,509,949
Add: Authority Fees (LSLL) - <i>GST Exempt</i>	(0.25%)	\$ 598,152
TOTAL EDC (Excl GST) for SSD/SSI		\$ 218,108,101
Add: GST - <i>Calculated on Sub-total - 2 Amount only</i>		\$ 21,750,995
TOTAL DEVELOPMENT COST (Plus GST) for NON-SSD/SSI		\$ 239,859,096
GROSS FLOOR AREA		
Total Gross Floor Area (AIQS Definition)		56,968m ²
Construction Cost Only \$/m ² GFA (AIQS Definition)		\$1,322/m ²

This calculation of the EDC is an objective and accurate assessment and covers the full scope of works in the identified development proposal, at the date of Environmental Impact Statement (EIS) submission.

Basis of Report Preparation

- Prepared this estimate as a requirement for a SEARS lodgement. This is not a tender estimate
- We have prepared this estimate in response to Secretary's Environmental Assessment Requirements (SEARS) issued for State Significant Developments in NSW (SSD) or State Significant Infrastructure in NSW (SSI)
- We have prepared the estimate based on the legislative and regulatory requirements of the consent authority for calculating the EDC (EP&A Act, EP&A reg, SEPPS, and the Planning Circular)
- We have prepared this estimate generally in accordance with the AIQS Practice Standard (1st Edition 1 published March 2024) for calculating EDC in NSW
- We have measured Gross Floor Area (GFA) in accordance with the Method of Measurement of Building Areas in the AIQS Cost Management Manual Volume 1, Appendix A2
- We have included works as indicated on the drawings and within the site boundary



- We have excluded GST in the calculation of the Estimated Development Cost
- We have calculated the development costs including price escalation to intended commencement date of construction on site in Mid-February 2026
- We have separately shown the estimated development costs plus GST, for use by the Approval Authority where relevant in calculating certain other fees and charges
- Prepared this estimate as a requirement for a SEARS lodgement. This is not a tender estimate
- List of the development proposal documents used:
 - Architectural drawings 14291 DA010, DA021 and DA0031 as prepared by Nettleton Tribe Partnership Pty Ltd

Scope of Calculation of EDC

- We have prepared an Estimated Development Cost (EDC), using NSW Government Planning Circular *PS 24-002 Changes to how development costs are calculated for planning purposes*, for the construction of a new warehouse with a two-level ancillary office. This includes a high-bay warehouse component at the western portion of the warehouse with loading areas at the north and south sides of the warehouse. The works also include all associated external works
- The Proponent for this development proposal is HB+B Property
- We certify that we have provided the genuine costs of the development proposed by this application and these costs are based on industry recognised prices.
- We confirm that we are not aware of any obvious limitations encountered in the preparation of the report.
- Refer to Annexure A for our Elemental Cost estimate which has been prepared generally in accordance with the Australian Cost Management Manual issued by the Australian Institute of Quantity Surveyors (AIQS).

List of Exclusions

The below items of cost are specifically excluded in line with Section 6 of the EP&A Regulation:

- Amounts payable on the cost of land including Development Contributions
- Costs related to any part of the development subject to a separate development consent or approval
- Land costs including costs of purchasing holding and marketing
- Ongoing maintenance or use of the development
- GST, and
- Finance Cost

This EDC report has been prepared by:

Peter Hammond MCIOB FRICS AAIQS No. 9898
Director
Napier & Blakeley Pty Ltd

ENCL – ANNEXURE A – ELEMENTAL COST ESTIMATE



Report Parameters

This report is the opinion of Napier & Blakeley Pty Ltd ACN 006 386 278 atf Napier & Blakeley Unit Trust ABN 87 601 474 307 (**Napier & Blakeley**) and is to be read together with and is subject to the term and conditions of our engagement. Our opinions in this report are based on the information referred to in this report that has been made available to us by or on behalf of the addressee (**Information**).

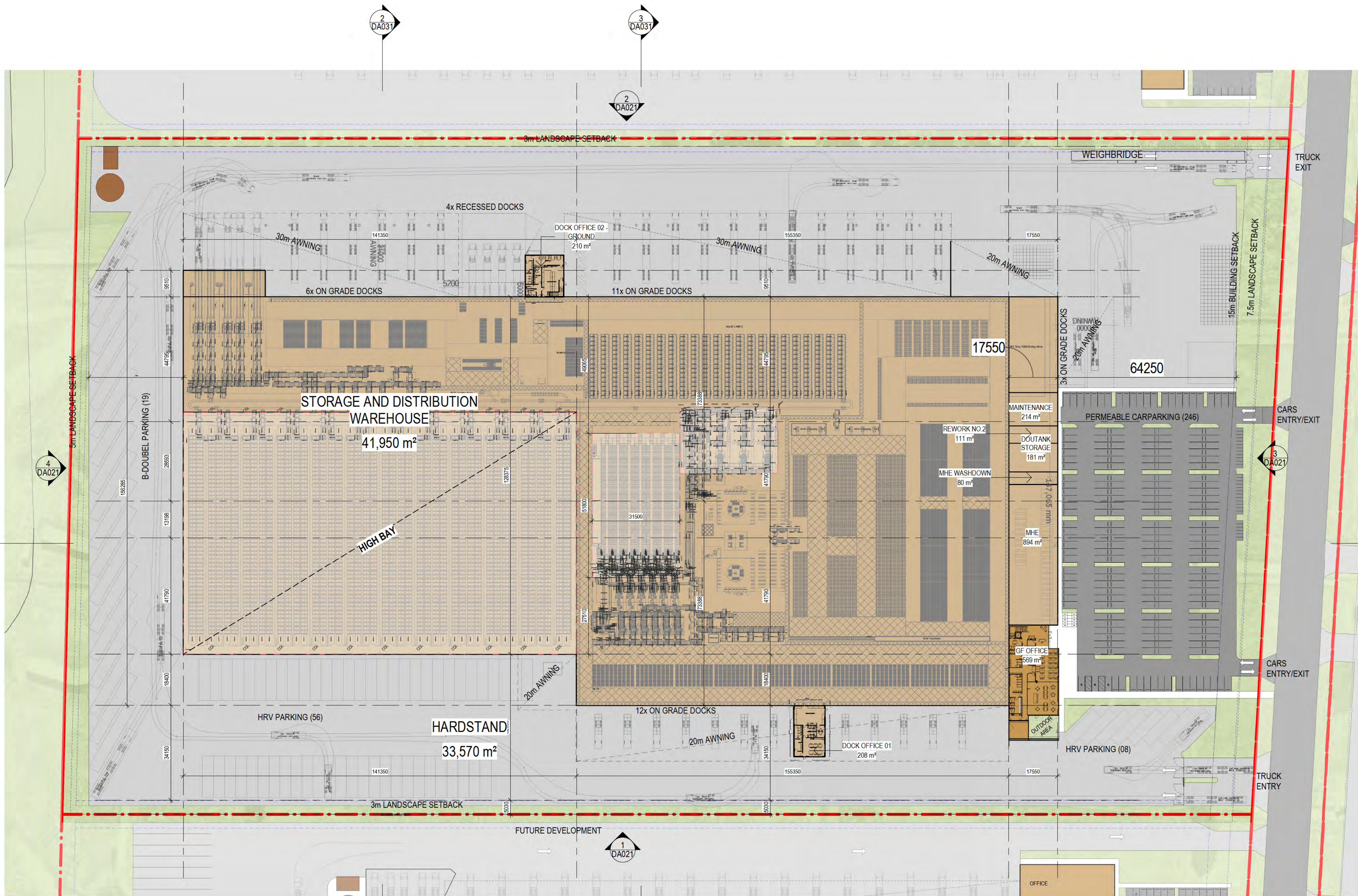
Napier & Blakeley has not obtained independent verification of the Information. As such, our opinion may be different if the Information is incorrect or inaccurate in any way. This report was prepared solely for the addressee and its use is limited to the purpose for which it was provided. No third party may rely on this report without first obtaining the prior written consent of Napier & Blakeley.

Napier & Blakeley does not warrant the accuracy or completeness of the Information, and to the maximum extent permitted by law, does not accept any responsibility or liability for any loss suffered by any person or entity as a result of or in connection with error, inaccuracy, misrepresentation, incompleteness or similar defect in the Information and/or this report or any default, negligence or lack of care in relation to the preparation or provision of the Information and/or this report.

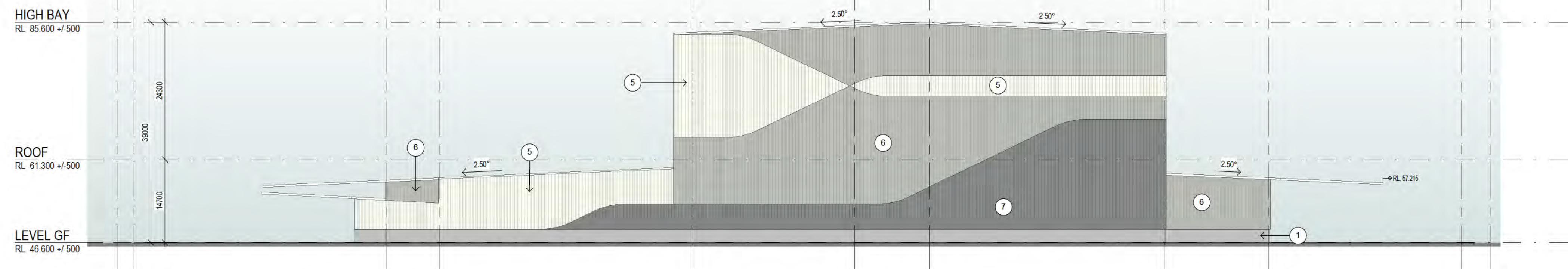
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PROJECT:		221-235 Luddenham Rd, Orchard Hills		Description: The construction of a new warehouse with a two-level ancillary office. This includes a high-bay warehouse component at the western portion of the warehouse with loading areas at the north and south sides of the warehouse. The works also include all associated fly out works and external works.									
JOB NUMBER:		2748082343											
DATE:		12-Feb-25											
	10.0%	PRELIMINARIES	10.0%	Insert	ALL INSERT CELLS = This colour								
	0.0%	UNMEASURED WORKS ALLOWANCE	0.0%	Insert									
	4.0%	PROFIT & OVERHEADS	4.0%	Insert									
	5.0%	PROFESSIONAL FEES	5.0%	Insert					AREA NOT IN TOTAL				
		FUNCTIONAL AREA =			Warehouse - FECA (m2)		Office + Amenities (Warm - Shell) - FECA		Awning - UCA (m2)		External Works (m2)	TOTAL WORKS	
					Area sqm = 43 275		Area sqm = 1 854		Area sqm = 11 750		Area sqm = 49 082	Area sqm = 56 968	
					\$/SQM	\$	\$/SQM	\$	\$/SQM	\$	\$/SQM	\$	\$/SQM
O1	SB	SUBSTRUCTURE	\$ 254.47	\$11,012,238	\$ 122.93	\$227,916	-	-	-	-	\$ 197.67	\$11,261,038	
O2	CL	Columns	\$ 69.75	\$3,018,300	\$ 30.00	\$55,620	-	-	-	-	\$ 53.99	\$3,075,705	
O3	UF	Upper Floors	-	-	\$ 166.13	\$308,000	-	-	-	-	\$ 5.41	\$308,000	
O4	SC	Staircase	-	-	\$ 12.43	\$23,040	-	-	-	-	\$ 0.40	\$23,040	
O5	RF	Roof	\$ 221.00	\$9,563,775	\$ 278.34	\$516,040	\$ 375.00	\$4,406,250	-	-	\$ 254.28	\$14,486,065	
O6	EW	External Walls	\$ 209.64	\$9,072,054	\$ 197.59	\$366,327	-	-	-	-	\$ 165.99	\$9,456,201	
O7	WW	Windows	-	-	-	-	-	-	-	-	-	-	
O8	ED	External Doors	\$ 7.86	\$340,250	-	-	-	-	-	-	\$ 5.97	\$340,250	
O9	NW	Internal Walls	\$ 49.25	\$2,131,500	\$ 150.00	\$278,100	-	-	-	-	\$ 42.30	\$2,409,600	
10	NS	Internal Screens & B/L	-	-	\$ 25.00	\$46,350	-	-	-	-	\$ 0.81	\$46,350	
11	ND	Internal Doors	-	-	\$ 50.00	\$92,700	-	-	-	-	\$ 1.63	\$92,700	
TOTAL		SUPERSTRUCTURE	\$ 557.50	\$24,125,879	\$ 909.48	\$1,686,177	\$ 375.00	\$4,406,250	-	-	\$ 530.79	\$30,237,911	
12	WF	Wall Finishes	-	-	\$ 175.00	\$324,450	-	-	-	-	\$ 5.70	\$324,450	
13	FF	Floor Finishes	\$ 23.33	\$1,009,700	\$ 175.00	\$324,450	\$ 2.00	\$23,500	-	-	\$ 24.07	\$1,371,038	
14	CF	Ceiling Finishes	-	-	\$ 101.62	\$188,400	-	-	-	-	\$ 3.35	\$190,631	
TOTAL		FINISHES	\$ 23.33	\$1,009,700	\$ 451.62	\$837,300	\$ 2.00	\$23,500	-	-	\$ 33.11	\$1,886,119	
15	FT	Fitments	\$ 2,209.81	\$95,629,720	\$ 1,946.77	\$3,609,316	\$ 5.00	\$58,750	-	-	\$ 1,743.05	\$99,298,679	
16	SE	Special Equipment	-	-	-	-	-	-	-	-	-	-	
TOTAL		FITTINGS	\$ 2,209.81	\$95,629,720	\$ 1,946.77	\$3,609,316	\$ 5.00	\$58,750	-	-	\$ 1,743.05	\$99,298,679	
17	SF	Sanitary Fixtures	-	-	-	-	-	-	-	-	-	-	
18	PD	Sanitary Plumbing	\$ 15.00	\$649,125	\$ 125.00	\$231,750	\$ 25.00	\$293,750	-	-	\$ 20.66	\$1,176,856	
19	WS	Water Supply	-	-	-	-	-	-	-	-	-	-	
20	GS	Gas Service	-	-	-	-	-	-	-	-	-	-	
21	SH	Space Heating	-	-	-	-	-	-	-	-	-	-	
22	VE	Ventilation	\$ 5.00	\$216,375	\$ 25.00	\$46,350	-	-	-	-	\$ 4.61	\$262,725	
23	EC	Evaporative Cooling	-	-	-	-	-	-	-	-	-	-	
24	AC	Air Conditioning	-	-	\$ 100.00	\$185,400	-	-	-	-	\$ 3.25	\$185,400	
25	FP	Fire Protection	\$ 85.58	\$3,703,550	\$ 65.00	\$120,510	\$ 35.00	\$411,250	-	-	\$ 74.35	\$4,235,310	
26	LP	Electric Light & Power	\$ 81.57	\$3,530,125	\$ 286.81	\$531,750	\$ 35.00	\$411,250	-	-	\$ 78.57	\$4,476,249	
27	CM	Communications	-	-	-	-	-	-	-	-	-	-	
28	TS	Transportation Systems	\$ 13.86	\$600,000	\$ 48.54	\$90,000	-	-	-	-	\$ 12.11	\$690,000	
29	SS	Special Services	-	-	-	-	-	-	-	-	-	-	
TOTAL		SERVICES	\$ 201.02	\$8,699,175	\$ 650.36	\$1,205,760	\$ 95.00	\$1,116,250	-	-	\$ 193.56	\$11,026,540	
30	CE	CENTRALISED ENERGY SYSTEMS	-	-	-	-	-	-	-	-	-	-	
31	AR	DEMOLITION	-	-	-	-	-	-	-	-	-	-	
		SUB-TOTAL - BUILDING	\$ 3,246.14	\$140,476,712	\$ 4,081.16	\$7,566,469	\$ 477.00	\$5,604,750	-	-	\$ 2,698.17	\$153,710,287	
		PRELIMINARIES - BUILDING	\$ 324.61	\$14,047,671	\$ 408.12	\$756,647	\$ 47.70	\$560,475	-	-	\$ 269.82	\$15,371,029	
		UNMEASURED WORKS ALLOWANCE	-	-	-	-	-	-	-	-	-	-	
		SUB-TOTAL - BUILDING	\$ 3,570.75	\$154,524,383	\$ 4,489.28	\$8,323,116	\$ 524.70	\$6,165,225	-	-	\$ 2,967.99	\$169,081,315	
32	XP	Site Preparation incl. excavation	-	-	-	-	-	-	\$ 5.79	\$283,959	\$ 4.98	\$283,959	
33	XR	Roads Footpaths & Paved Areas	-	-	-	-	-	-	\$ 148.50	\$7,288,550	\$ 127.94	\$7,288,550	
34	XN	Boundary Walls, Fencing & Gates	-	-	-	-	-	-	\$ 28.66	\$1,406,500	\$ 24.69	\$1,406,500	
35	XB	Pool, Outbuilding & Covered Ways	-	-	-	-	-	-	-	-	-	-	
36	XL	Landscaping & Improvements	-	-	-	-	-	-	\$ 8.72	\$427,970	\$ 7.51	\$427,970	
TOTAL		SITE WORKS	-	-	-	-	-	-	\$ 191.66	\$9,406,979	\$ 165.13	\$9,406,979	
37	XK	Ext Stormwater Drainage	-	-	-	-	-	-	\$ 37.13	\$1,822,453	\$ 31.99	\$1,822,453	
38	XD	Ext Sewer Drainage	-	-	-	-	-	-	\$ 0.61	\$30,000	\$ 0.53	\$30,000	
39	XW	Ext Water Supply	-	-	-	-	-	-	\$ 0.31	\$15,000	\$ 0.26	\$15,000	
40	XG	Ext Gas	-	-	-	-	-	-	\$ 0.31	\$15,000	\$ 0.26	\$15,000	
41	XF	Ext Fire Protection	-	-	-	-	-	-	\$ 7.13	\$350,000	\$ 6.14	\$350,000	
42	XE	Ext Electrical	-	-	-	-	-	-	\$ 12.22	\$600,000	\$ 10.53	\$600,000	
43	XC	Ext Communications	-	-	-	-	-	-	\$ 1.02	\$50,000	\$ 0.88	\$50,000	
44	XS	Ext Special Services	-	-	-	-	-	-	-	-	-	-	
TOTAL		EXTERNAL SERVICES	-	-	-	-	-	-	\$ 58.73	\$2,882,453	\$ 50.60	\$2,882,453	
45	XX	EXTERNAL ALTERATIONS	-	-	-	-	-	-	-	-	-	-	
		SUB-TOTAL - EXTERNAL WORKS	-	-	-	-	-	-	\$ 250.39	\$12,289,432	\$ 215.72	\$12,289,432	
		PRELIMINARIES - EXTERNAL	-	-	-	-	-	-	\$ 25.04	\$1,228,943	\$ 21.57	\$1,228,943	
		UNMEASURED WORKS ALLOWANCE	-	-	-	-	-	-	-	-	-	-	
TOTAL		EXTERNAL WORKS	-	-	-	-	-	-	\$ 275.43	\$13,518,375	\$ 237.30	\$13,518,375	
46	YY	PROFIT & OVERHEADS	\$ 142.83	\$6,180,975	\$ 179.57	\$332,925	\$ 20.99	\$246,609	\$ 11.02	\$540,735	\$ 128.21	\$7,303,988	
TOTAL		BUILDING + EXTERNAL WORKS + SPECIAL PROVISIONS	\$ 3,713.58	\$160,705,358	\$ 4,668.85	\$8,656,041	\$ 545.69	\$6,411,834	\$ 286.44	\$14,059,110	\$ 3,333.50	\$189,903,677	
		PROFESSIONAL FEES	\$ 185.68	\$8,035,268	\$ 233.44	\$432,802	\$ 27.28	\$320,592	\$ 14.32	\$702,955	\$ 166.68	\$9,495,184	
TOTAL		GROSS WORKS	\$ 3,899.26	\$168,740,626	\$ 4,902.29	\$9,088,843	\$ 572.97	\$6,732,426	\$ 300.76	\$14,762,065	\$ 3,500.18	\$199,398,861	

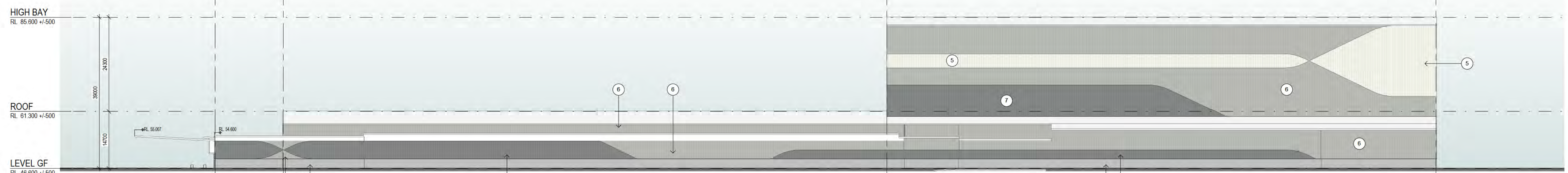
APPENDIX B ARCHITECTURAL PLANS



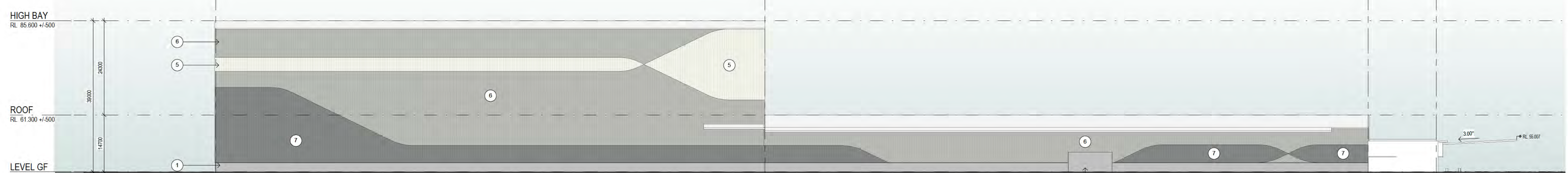
STORAGE AND DISTRIBUTION WAREHOUSE,AIBP	
LUDDENHAM ROAD, ORCHARD HILLS	
SITE AREA (m²)	104,959
Total Building Foot Print	44,544
WAREHOUSE LOW BAY AREA (m²)	27,576
WAREHOUSE HIGH BAY AREA (m²)	14,375
TOTAL WAREHOUSE AREA (m²)	41,951
MHE	894
MHE WASHDOWN	80
MAINTENANCE	214
REWORK NO.02	111
DOUTANK STORAGE	181
SWITCHROOM - MSB	51
PUMP ROOM AND TANKS	125
TOTAL D/O AREA (m²)	1,656
WAREHOUSE & SERVICES AREA	43,607
DOCK OFFICE 01(m²)	209
DOCK OFFICE 02 (m²) - Ground	210
DOCK OFFICE 02 (m²) - LEVEL 1	210
OFFICE GROUND FLOOR AREA (m²)	569
OFFICE LEVEL 1 AREA (m²)	707
TOTAL OFFICE AREA (m²)	1,905
TOTAL GLA AREA	45,512
FSR	0.43
Parking	
CAR PARKING	246
HRV PARKING	64
B-DOUBLE PARKING	19
TOTAL PARKING	329
External Areas	
CANOPIES	11,918
ASPHALT / PERMEABLE CAR PARKING	6,439
HARDSTAND	33,570
LANDSCAPE AREA	7,673
LIGHTDUTY CONCRETE	n/a
PAVEMENT - BRUSHED CONCRETE	n/a
PAVEMENT - EXPOSED CONCRETE	593
OUTDOOR AREA	239
TOTAL	48,514
TOTAL	14,351
LANDSCAPE PERCENTAGE	13.67%



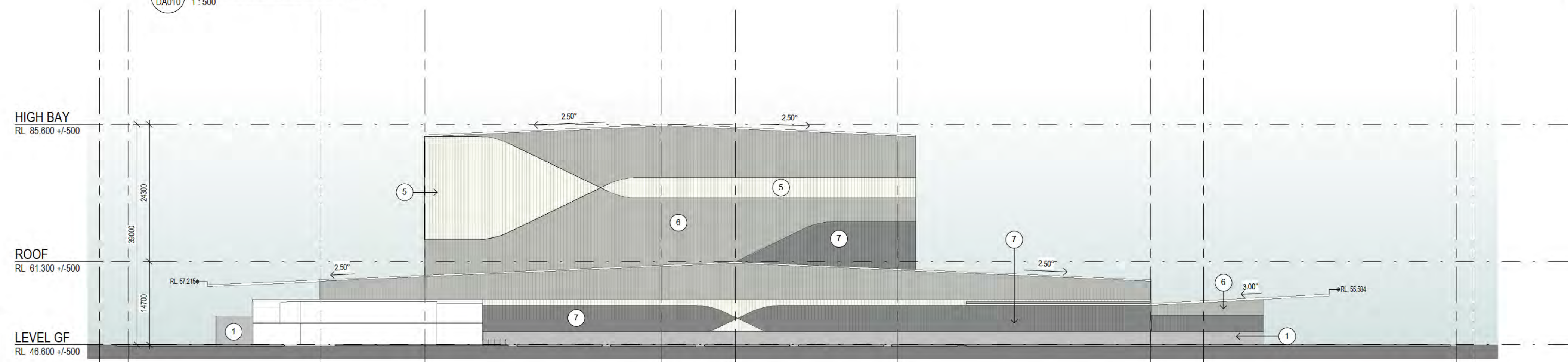
4 WAREHOUSE - WEST ELEVATION
DA010 1:500



2 WAREHOUSE - NORTH ELEVATION
DA010 1:500



1 WAREHOUSE - SOUTH ELEVATION
DA010 1:500

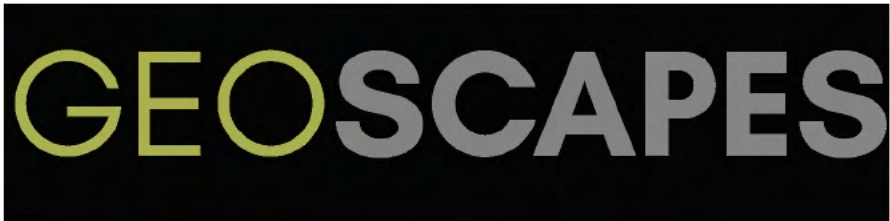


3 WAREHOUSE - EAST ELEVATION
DA010 1:500

EXTERNAL FINISHES LEGEND

1	PRECAST WALLS/STRUCTURAL COLUMNS/STRUCTURAL FRAMING - PAINTED TO MATCH Colour "Dover White™", or similar	11		20	
2		12		21	
3		13A		22	
4		13B		23	
5	PROF LED METAL SHEETING Colour "Dover White™", or similar	14			
6	PROF LED METAL SHEETING Colour "Shale Grey™", or similar	15			
7	PROF LED METAL SHEETING Colour "Wind Spay™", or similar	16			
8		17			
9		18			
10		19			

APPENDIX C VISUAL IMPACT ANALYSIS



Alspec Industrial Business Park, Orchard Hills, NSW

VISUAL ANALYSIS SCOPING REPORT - STORAGE AND DISTRIBUTION WAREHOUSE

Report Ref: **241111_SSD_RPT_VA01**

Prepared for:



Prepared by

Ben Gluszkowski
Director
Registered Landscape Architect #5868

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ABN 84 620 205 781
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Document Status			
REV	Description	Initial	Date
A	For Scoping Submission	BG	18.02.2025
-	Draft Text for Review	BG	13.02.2025



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1.0 INTRODUCTION

1.1 Project Background

Geoscapes have been appointed by HB&B on behalf of Alspec to undertake Visual Scoping Analysis for the proposed development of a Storage and Distribution Warehouse within Alspec Industrial Park Business Park (AIBP) in Orchard Hills.

This initial visual analysis report serves to support the 'Scoping Report' prepared by Urbis for the request of project SEARs. A full Visual Impact Assessment (VIA) will be prepared by Geoscapes for the EIS.

The development will form part of the larger AIBP estate which was subject to a recent Planning Proposal that has been approved by Penrith Council. The Penrith Local Environmental Plan was updated and gazetted in May 2024.

The AIBP Planning Proposal sought to rezone the central and eastern portion of the subject site to E4 General Industrial and partly C2 Environmental Conservation, under which warehouse and distribution centres are a permissible use. Specifically, the planning proposal sought to:

- Rezone part of the site from RU2 Rural Landscape to Industrial (under E4 General Industrial),
- Amend the Minimum Lot Size map to reduce the minimum lot size to 1,000m²,
- Introduce a Height of Building control of 24 metres to the site,
- Introduce density provisions to ensure a mixture of large and small lots that meet the needs of the local market.
- Maintain a 40 metre wide corridor of land zoned RU2 Rural Landscape on the western side of Luddenham Road to allow for the future widening of Luddenham Road.

This established the framework under which this application is being progressed.

1.2 Project Summary

- Construction of a new warehouse with a two-level ancillary office. This includes a high-bay warehouse component at the western portion of the warehouse.
- A total building area of 42,671sqm; broken down as follows:
 - Warehouse area: 42,023sqm
 - Office Area: 648sqm
- Loading areas at the north and south sides of the warehouse, with hardstand surrounding the perimeter of the warehouse. Hardstand and carpark areas are accessed via four new driveways from the AIBP internal estate road.
- Provision of vehicular parking onsite to accommodate cars, vans, semi-trailers and B-doubles. It is envisaged that approximately 318 spaces will be provided on site within the proposed hardstand and carparking areas.
- Perimeter landscaping and tree planting, as well as a permeable carparking area with a total area of 6,403sqm.

1.3 Executive Summary

This Visual Analysis report indicates that for potential residential visual receivers along Luddenham Road, the visibility of the proposed development is likely to be low due to the presence of natural landform and existing vegetation. Therefore, a Visual Impact Assessment is likely to assess any visual impacts as not significant.

From more open views or longer distances the development and particular the high-bay would be more visible. At 39m the high-bay would be taller than the surround tree canopy and therefore, would be seen from rural properties to the south and from higher ground within Luddenham.

Treatments of the high-bay in terms of materials and aesthetics will be considered during the design process to reduce visual impacts.

1.4 Author

This has been written by Ben Gluszkowski (Geoscapes Director and Registered Landscape Architect) who has over 20 years' experience in the field of Landscape Architecture. He has previously been involved in high profile LVAs on developments within the UK, including the M1 & M62 motorway road widening, several wind farms and energy from waste facilities (EFW).

Within Australia, Ben has completed several LVAs and VIAs for some of the largest industrial developments in Sydney. These were either submitted as part of an Environmental Impact Statement (EIS) for State Significant Development (SSD) to the DPE, or to local council through the DA pathway. Clients have included Snackbrands Australia, Jaycar, Frasers, Altis, DCI, ESR, Charter Hall, Equinix, Stockland and Hale.

2.0 METHODOLOGY OF ASSESSMENT

2.1 Guidelines & Approach

This Visual Analysis (VA) report has been written to support a scoping report for a Storage and Distribution Warehouse within Alspec Industrial Business Park in Luddenham NSW. The following document was used in the preparation of supporting photomontages.

- The Landscape Institute Advice Note 01 (2011) Photography and Photomontage in Landscape and Visual assessment.

The proposed warehouse development will be subject to a full Visual Impact Assessment (VIA) which will form part of the EIS to be submitted through the SSDA pathway. The proposed developed also includes a 39m highbay element.

The intention of the VA report is to provide insight to the visibility of the development from surrounding visual receivers and the potential that the development may have to cause visual impacts, these impacts will fully assessed during the SSDA process.

2.2 Analysis of Zone of Visibility

The AIBP estate has been subject to several previous visual impact assessments conducted for a number of proposed developments. Geoscapes to date have written three VIA's for two DA's and one SSDA application. As part of these projects site visits were conducted in February and March of 2024.

The consultant team carried out site inspections to verify the results of a desktop study and to evaluate the existing visual character of the area. Analysis from inside of the site boundary was undertaken to approximate the potential Zone of Visibility of several developments. Viewpoint locations were identified the immediate surrounding context. These same viewpoints have been used for this VA report.

2.3 Photographic Recording

Viewpoints were selected and photographs were taken by Geoscapes Landscape Architects using a full-frame Canon RP DSLR camera and a fixed 50mm lens.

For longer distance locations photographs were stitched together to create panoramas using a cylindrical method in an automated software process. Closer up viewpoints were stitched together using a planar method and limited to 53.5°HfoV. GPS recordings were taken and locations mapped using topographical survey data. This information was later used to create the photomontages.

Additional 90°HfoV extended baseline photographs have also been included for all viewpoints, these are used for context purposes only.

2.4 3D Modeling of the Development

Morphmedia were engaged to place a digital three-dimensional computer model of the development using Autodesk 3Ds Max. For the purposes of this report an initial basic massing model was supplied by NettletonTribe. The civil design surface model had been previously provided by Henry & Hymas for other projects within the estate. All works associated with the AIBP estate were combined with the landscape design proposed by Geoscapes, this includes street tree planting proposed for the estate access roads. No landscaping to the proposed development lot has been incorporated at this stage.

Camera positions of photographs taken from selected viewpoints were added to the model from the recorded GPS data. Known reference points obtained from survey information were positioned into the view and these were then combined with the site photographs to create the simulated massing views of the proposal seen within Section 6.0.

2.5 Computer Generated Visualisations - Photomontages

Photomontages have been prepared to create 'massing' views of the proposed development. Although these do not claim to exactly replicate what would be seen by the human eye, they provide a useful 'tool' to inform the potential visual impacts that could be received from the surrounding area.

The horizontal field of view (FOV) within the 'extended' baseline photographs (90°), exceeds the parameters of normal human vision. While the human eye FOV is understood to be approximately 160°, the actual amount of detail in focus is much less and deteriorates towards the outer extents of the FOV. The 'Cone of Visual Attention' of the human eye is thought to be 55° however, in reality the eyes, head and body can all move and, under normal conditions, the human brain would 'see' a broad area of landscape within a panoramic view. Baseline photographs and photomontages for Viewpoints 1 and 2 within Section 6.0 of this report have a horizontal viewing angle of approximately 67°. Viewpoints 3 to 6 have a horizontal viewing angle of 53.5°. A single photographic image from a 50mm lens (full frame DSLR) has a horizontal viewing angle of 40°.

Whilst a photomontage can provide a representation of a development in relation to its proposed location and scale relative to the surrounding landscape, it must be acknowledged that large scale objects in the landscape can appear smaller in photomontages than in real life. This is partly due to the fact that a flat image does not allow the viewer to perceive any information relating to depth or distance. An extract taken from the Photography and Photomontage in Landscape and Visual Impact Assessment, Landscape Institute Advice Note 01/11 states that:

'it is also important to recognise that two-dimensional photographic images and photomontages alone cannot capture or reflect the complexity underlying the visual experience and should therefore be considered an approximate of the three-dimensional visual experiences that an observer would receive in the field'.

Due to the nature of the photomontage process there will always be a small amount of error which is unavoidable. This can be attributed to several aspects including camera lens matching of the baseline photograph within the 3D model, the accuracy and placement of photographic reference points to position the development in the horizontal and vertical planes and the use of GPS (GPS measurement has an error tolerance) to locate the exact position of where the photograph was taken.

Photomontages are intended to be printed at A3 and are to be held at a comfortable distance by the viewer, this is generally accepted by current guidelines to be anywhere from 300mm to 500mm away from the eyes.

2.6 Visual Receptor Sensitivity

Visual sensitivity is the level that which views and/or landscape that are experienced from vantage points can vary from the existing character or proposed future character without changing the fundamental elements or distinctive qualities that make the landscape recognisable.

People's (visual receptors) overall visual sensitivity has been assessed by combining consideration of their visual susceptibility with the value or importance that they are likely to attribute (or not) to their available views.

Factors which influence professional judgement when assessing the degree to which a particular view can accommodate change arising from a particular development, without detrimental effects would typically include:

- Judgements of value attached to views take into account recognition of the value attached to particular views e.g. heritage assets or through planning designations; and
- Judgements of susceptibility of visual receptors to change is mainly a function of the occupation or activity of people experiencing the view at particular locations; and the extent to which their attention or interest may therefore be focused on the views and the visual amenity they experience at particular locations.

Assessment of the sensitivity of visual receptors may be modified (either up or down) by consideration of whether any particular value or importance is likely to be attributed by people to their available views. For example, travelers on a highway may be considered likely to be more sensitive due to a high level of surrounding scenic context or residents of a particular property may be considered likely to be less sensitive due to its degraded visual setting. Typically, sensitivity of visual receptors may be judged to be very high, high, medium, low or very low. Definitions of these indicative categories as appropriate to this assessment are set out in the below.

Table: Visual Receptor Sensitivity

Category	Definition
Very High	Designed view to or from a heritage / protected asset. Key protected viewpoint e.g. interpretive signs. References in literature and art/or guidebooks and tourist maps. Protected view recognised in planning policy designation [LEP, DCP, SEPP]. Views from the main living space of residential properties, state public rights of way e.g. bush trails and state designated landscape feature with public access. Visitors to heritage assets of state importance.
High	View of clear value but may not be formally recognised e.g. framed view of high scenic value from an individual private dwelling or garden. It may also be inferred that the view is likely to have value e.g. to local residents. Views from the secondary living space of residential properties and recreational receptors where there is some appreciation of the landscape e.g. golf and fishing. Local public rights of way and access land. Road and rail routes promoted in tourist guides for their scenic value.
Medium	View is not promoted or recorded in any published sources and may be typical of the views experienced from a given receptor. People engaged in outdoor sport where an appreciation of the landscape has little or no importance e.g. football and soccer. Road users on main routes (Motorway/Freeway/Highway) and passengers on trains.
Low	View of clearly lesser value than similar views experienced from nearby visual receptors that may be more accessible. Road users on minor roads. People at their place of work or views from commercial buildings where views of the surrounding landscape may have some importance.
Very Low	View affected by many landscape detractors and unlikely to be valued. People at their place of work or other locations where the views of the wider landscape have little or no importance.

Assessment of views experienced from vantage points enables the overall assessment of sensitivity and potential locations for required mitigation. A range of viewpoints have been selected to test the visibility of the proposals. Some viewpoints have been selected to demonstrate that the subject will not be visible for receptor locations that would be considered to have high sensitivity.

The rationale for the selection of viewpoints is based on but not limited to:

- i. Topography
- ii. Distance from site
- iii. Distance between viewpoints
- iv. Frequency and duration of view
- v. What the view is of
- vi. Where the view is experienced from

2.7 Potential Visibility

The degree to which the development will be visible to visual receptors is based upon the photomontages within Section 6.0. This relies on accurately placing a 3D model into the site's location and surrounding landscape. Digital mapping and Point Cloud data is used as part of the process to guide what elements of the landscape (i.e vegetation, natural topography, buildings or service infrastructure), may obscure the development or parts of the development to the receiver.

As previously discussed this assessment does not provide a judgement on the visual impacts that would likely be received at receptor locations. Though a development might be clearly visible at a location based on the basic model, it might not cause visual impacts that are considered to be significant. For example the sensitivity of a viewpoint could be low, visual impacts could also potentially be mitigated or reduced through design, this could take the form of proposed landscaping and / or architectural treatments. These impacts can only be assessed at the SSDA stage at which point more detail is provided regarding these treatments.

However, this report can provide a useful baseline to inform which views are likely to be of most importance when considering visual impacts.

3.0 JUSTIFICATION OF VIEWPOINTS SELECTED

3.1 Receptor Selections and Reasoning

The visual sensitivity of receivers and the potentially visibility of the proposed development have been assessed based on the criteria described in Section 2.6 & 2.7. The following list of visual receptors have been selected:

- 443-457 Luddenham Road, Luddenham (VP1)
- Luddenham Road (Approach from South), Orchard Hills (VP2)
- Adjacent to 262 Luddenham Road, Orchard Hills (VP3)
- Luddenham Road (Adjacent to Estate Boundary), Orchard Hills (VP4)
- Luddenham Road, (Approach from North), Orchard Hills (VP5)
- View from future North South Rail Link, Orchard Hills (VP6)

As is evident in aerial mapping and previously conducted drone photography for the estate (refer to Figures 4 to 5), the Subject Site is well screened by existing bushland especially to the north and west. The under-construction north south rail link to Western Sydney Airport does run adjacent to the western boundary and a viewpoint has been selected to represent potential views from future commuters traveling past the proposed development.

Though existing vegetation would likely result in most of the proposed development being screened from visual receptors to the north, the high-bay element may be seen above the tree line. Therefore, VP5 was selected to test the potential viability of this element.

To the south lower parts of the development would also be well screened by existing vegetation, VP1 has been selected to determine how visible the high-bay element will be.

Further southwest Luddenham Road increases in elevation and a number of rural residential properties have views over Orchard Hills. These properties would experience views of the AIBP estate including the proposed development. However, with a viewing distance of over 4km away any visual impacts would likely be very low to negligible.

To the east approximately 12 rural properties are located on the eastern side of Luddenham Road. These will have close range and direct views of the AIBP estate and the ALSPEC warehouse following construction. However, land to the western side of Luddenham Road contains the Bosna Croatian Club and adjacent properties at 233, 251-261, 263-273, 275-285 and 287 Luddenham Road. These lands have also recently been rezoned E4 and therefore, are likely to be subject to industrial development in the short to medium term. Following development of these lands and other lots within AIBP it is likely that the proposed warehouse would be hidden to several receptors by other buildings (refer to Section 4.5 for further details).

Viewpoints 2, 3 and 4 have been selected to represent views from the properties along the eastern side of Luddenham Road.

Further east longer distance views may exist from higher ground such as the northern end of Aldington Road. However, Aldington Road is within the Mamre Road Industrial Precinct and is currently subject to a number of industrial developments, as a result a number of residential dwellings have been removed. Therefore, the sensitivity of Aldington Road will be reduced and the proposed development would have a negligible impact upon views from these locations.

Motorists along Luddenham Road traveling north or southbound in the short term will also experience views of the warehouse. Traffic numbers are likely to increase following planned future road widening. Viewpoints 2, 3, 4 and 5 also provide an indication of the type of views that are likely to be experienced by these types of visual receptor.

A total of five viewpoints within the public domain and one private dwelling have been selected for this scoping report. Further analysis of the high-bay element will be carried out in the VIA. This will involve flying a drone to the maximum elevation of the high-bay to establish it's potential zone of visual influence.



LEGEND

ESTATE BOUNDARY

DEVELOPMENT LOT BOUNDARY

PHOTOMONTAGE LOCATION WITH VIEWPOINT NO.

SCHEDULE OF VIEWPOINTS				
VP Number	Address	Southings	Eastings	Elevation AHD
1	443-457 Luddenham Road, Luddenham	33°50'05.2"S	150°44'52.1"E	66.5m
2	Luddenham Road (Approach from South), Orchard Hills	33°49'42.7"S	150°45'32.1"E	39.3m
3	Adjacent to 262 Luddenham Road, Orchard Hills	33°49'23.2"S	150°45'40.1"E	37.3m
4	Luddenham Road (Opposite Lot Boundary), Orchard Hills	33°49'06.0"S	150°45'37.3"E	39.2m
5	Luddenham Road (Approach from North) Orchard Hills	33°48'47.6"S	150°45'36.4"E	35.3m
6	View from future North South Rail Link, Orchard Hills	33°49'20.8"S	150°44'49.7"E	42.3m

Figure 1: Viewpoint Locations

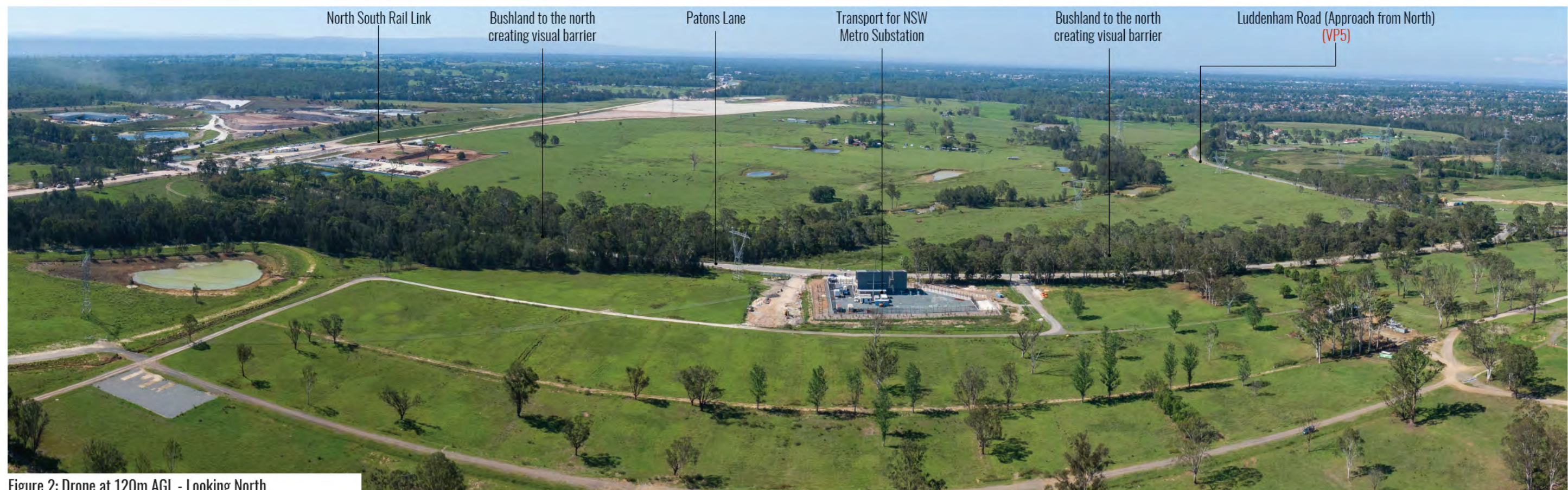


Figure 2: Drone at 120m AGL - Looking North



Figure 3: Drone at 120m AGL - Looking East



Figure 4: Drone at 120m AGL - Looking South

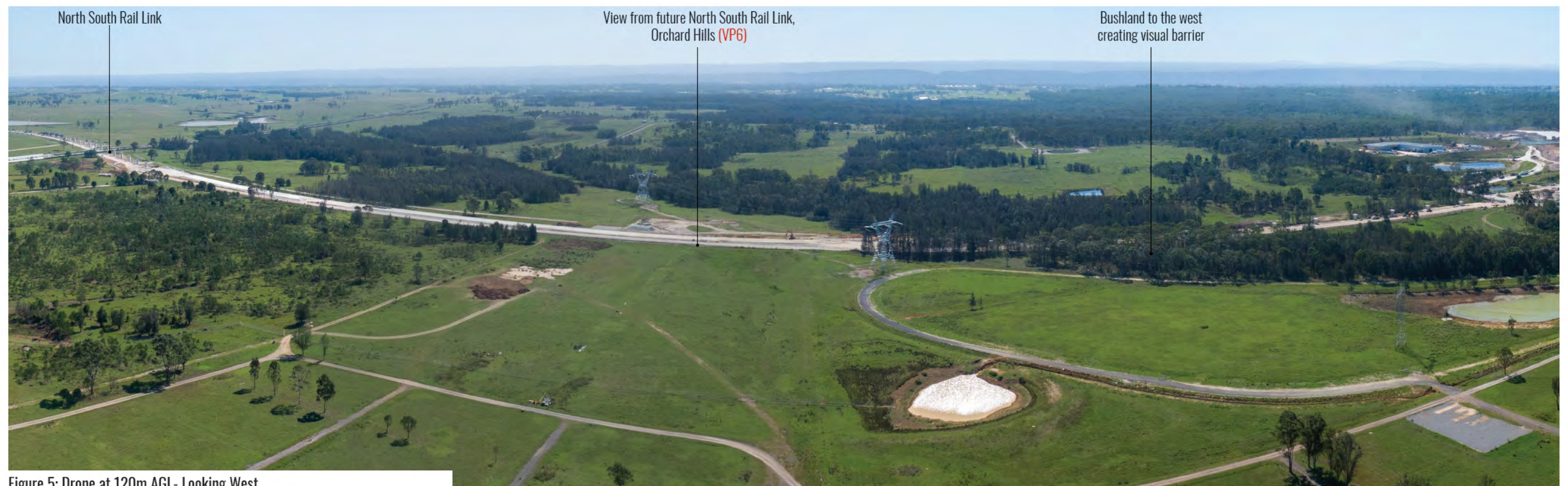


Figure 5: Drone at 120m AGL- Looking West

4.0 THE SITE AND ENVIRONS

4.1 Location

The development site is located within Alspec Industrial Business Park, Orchard Hills and in the Penrith Council Local Government Area. Figure 7 provides the site's location. Figure 8 provides the site's immediate context.

4.2 Site Description

The site description is summarised in the Figure below.

Figure 6 – Site Description

Component	Description
Address	Lot 12 - 221-227 Luddenham Road, Orchard Hills NSW 2748
Legal description	AIBP - Lots 1 & 2 in DP1293805
Proposed Development Site Area	106,242sqm (10.62ha)
Current zoning	General Industrial (E4)

4.3 Context

The proposed development is to be situated in Lot 12 within Alspec Industrial Business Park (AIBP). It is located approximately 4km south of the M4 motorway and 40km from Sydney CBD. The character of the immediate surrounding area is rural and agricultural.

The site is surrounded by the following specific land uses:

- The site shares the northern boundary with the proposed 'COPE' development. Further north is Patons Lane a parcel of land containing dense bushland and a tributary channel to south creek. Further north is privately owned pastoral and agricultural lands.
- To the east the site is bound by the internal access road of the estate with additional development planned on the eastern side of the access road. Further east rural residential properties along Luddenham Road.
- The southern boundary is shared with PAD4C which will contain future warehousing. Further south is an environment protection area (CPCP) and the future Western Sydney Freight Corridor. Beyond the AIBP site boundary are large lot rural residential dwellings within Luddenham.
- To the west the remainder of the AIBP estate will contain, flood storage basins and an electrical easement. Along the western boundary to AIBP runs the North South WSA rail link which is currently under construction.

4.4 Aerial Photography

During the Drone photography that was carried out within the site boundary in Feb 2024, (refer to section 3.1) aerial shots were taken at an AGL of 120m (see Figures 2-5 for 120m AGL Drone photography). These prove useful in the following ways:

- Demonstrating the site context in which the development sits;
- Highlighting key features of the surrounding landscape;
- Analysing the existing landscape character;

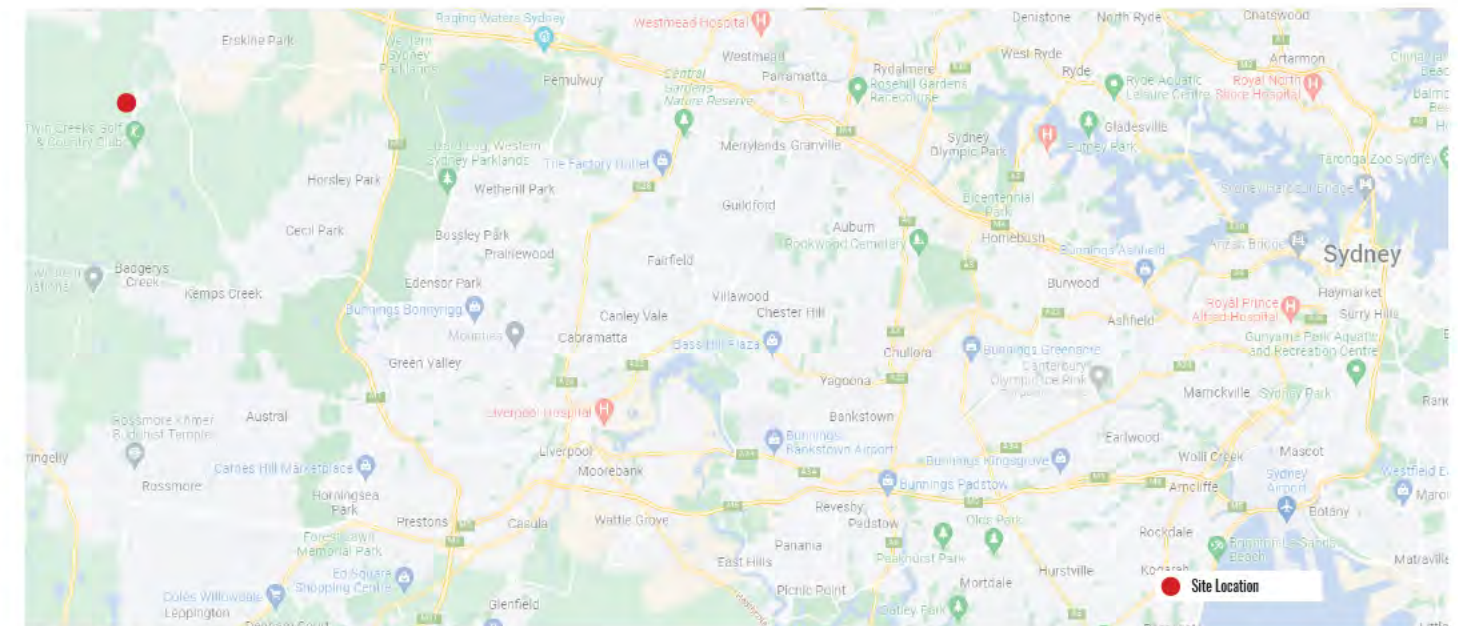


Figure 7: Site Location (Source: Google Maps)



Figure 8: Site Context (Source: Nearmap 2024)

4.5 AIBP Estate and Future Industrial Development

Situated in Figure 9 below is the current DA masterplan for Alspec Industrial Business Park, this contains 9 warehouses. Larger lot warehousing will be contained to the central and northern portions while future smaller units are planned for the south.

As the proposed development is located centrally within the estate it is likely to become less visible over time to visual receptors to the east. This will depend on the time-line of other development but this would be expected within 5 - 7 years. The Luddenham Road widening corridor could also have an impact on visibility of the proposed development in the future. It would be expected that the scheme would include planting to the verges to help mitigate visual impacts.

The AIBP estate development application also includes details of proposed earthworks, street tree planting and flood storage basins. These are included in the photomontages as it has been assumed that this infrastructure will be completed either before or at the same time as the proposed development. These works are visible in many of the viewpoint photomontages as shown in Section 6.0 of this report. As this infrastructure is expected to be approved but is subject to a separate DA any visual impacts created by earthworks and alike are not considered within this report. The addition of proposed earthworks, basins and street trees therefore, are considered to form part of the 'baseline' against which the introduction of the proposed development is assessed.

Situated centrally but outside of the AIBP boundary is the Bosna Croatian Club and several smaller privately owned properties. This land is also zoned E4 for industrial use and it would be expected that in the short to medium term this land would also be purchased by industrial developers. An

indicative masterplan has been included in Figure 10 below to indicate the type of lot arrangements that might be expected to the Croatian Club and the adjacent lots should they be developed.

4.6 Orchard Hills Residential Development

Located on the northern side of Patons Lane is the NSW Orchard Hill Precinct Boundary.

The Orchard Hills state-led precinct is part of the NSW Government's National Housing Accord commitment to deliver new homes and jobs growth close to transport, services and public spaces in Western Sydney.

Proposals for Stage one include:

- capacity for approximately 11,600 new homes, including various housing types like detached houses, dual occupancies, semi-detached dwellings, terraces, and apartments
- almost 50 ha of open space, including space for new recreational areas and sporting fields
- a new local town centre around the Orchard Hills Station and 2 additional smaller centres that will provide shops, services entertainment and public spaces opportunities for cycleways and walkways.

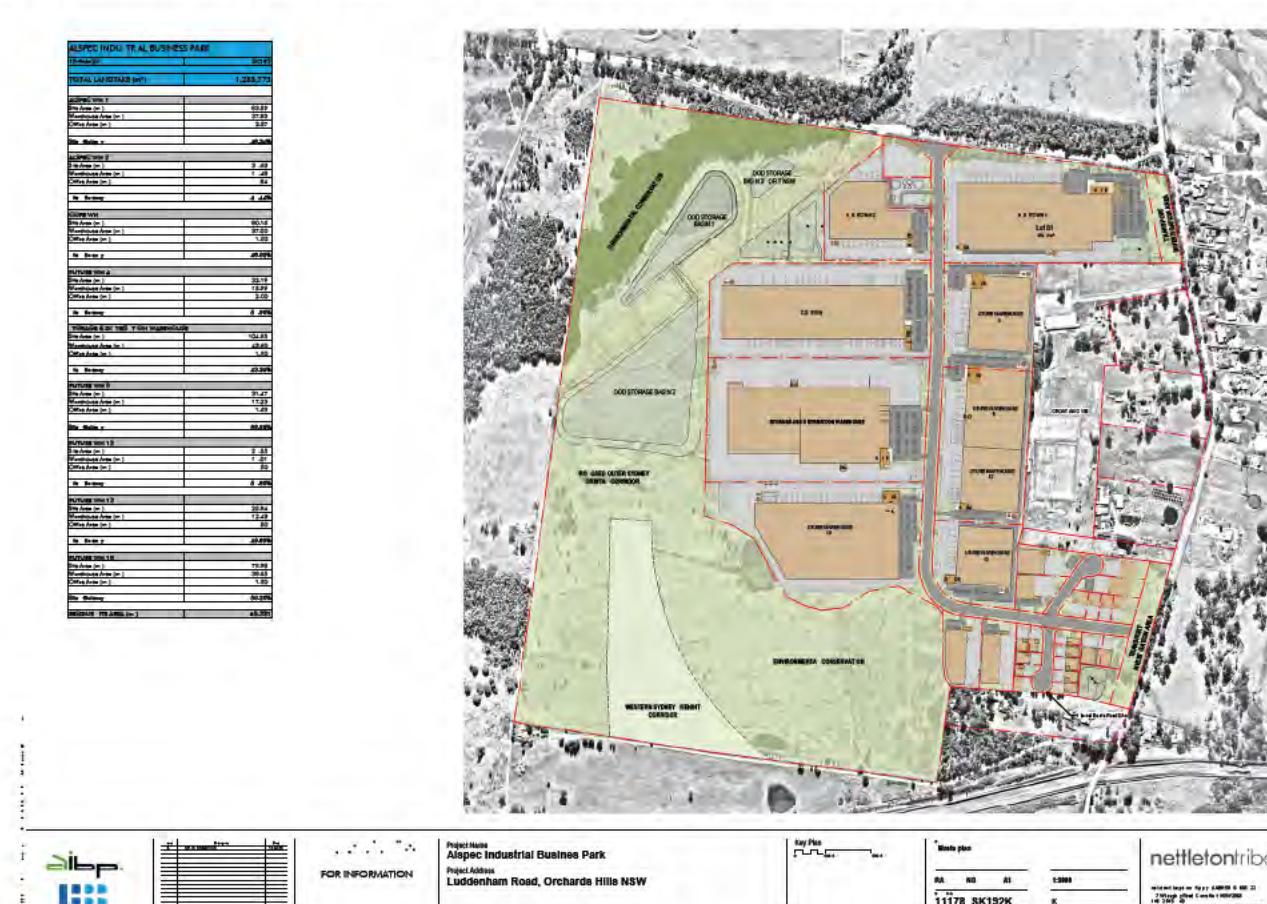


Figure 9: AIBP Masterplan (Source: HB&B)

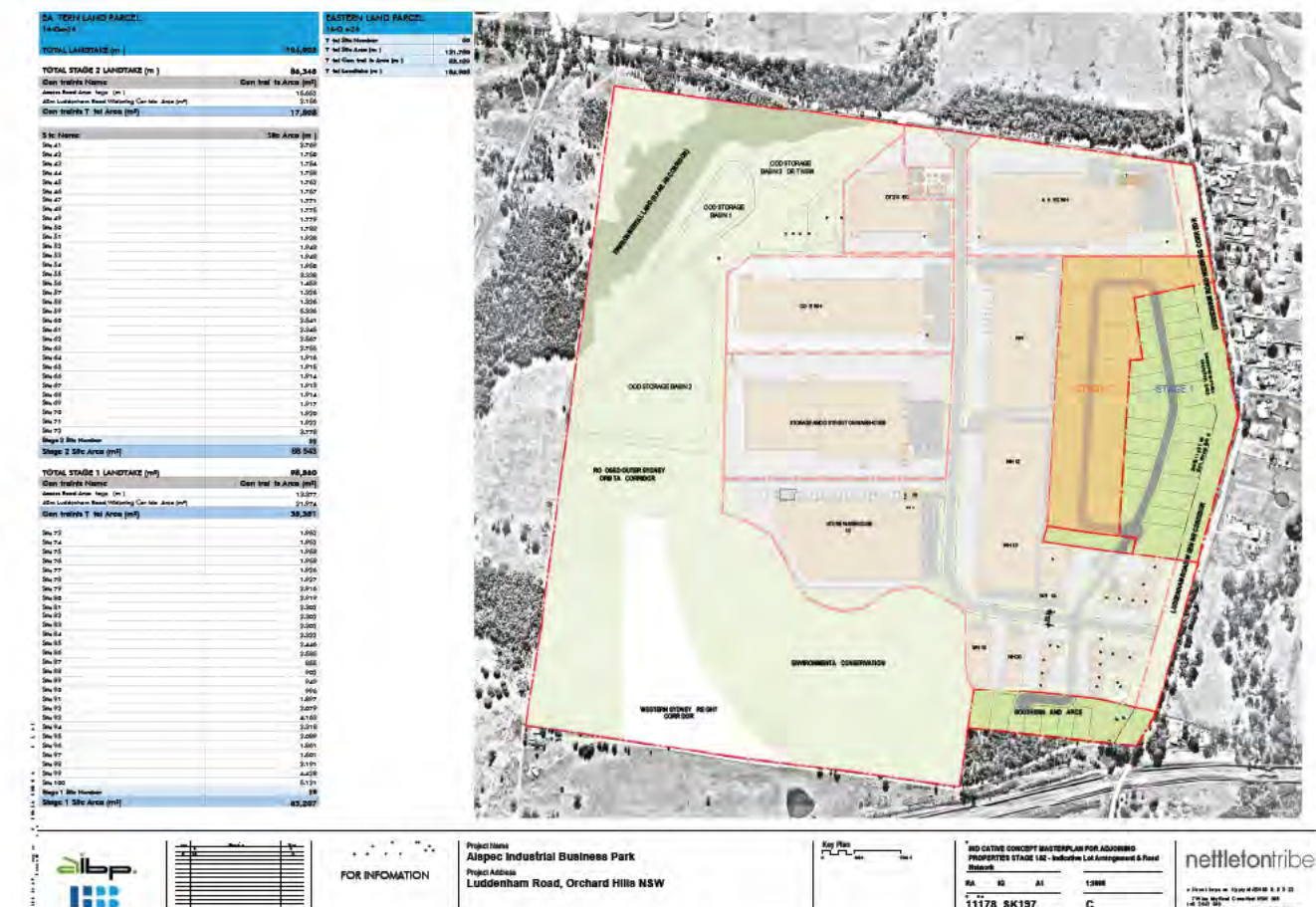


Figure 10: Potential Future Development Arrangement Plan (Source: HB&B)

The draft structure plan provides the future zoning intent for land in Orchard Hills outside of the Stage 1 Rezoning Area and will guide future planning decisions for the remaining stages, however it does not officially rezone land yet.

The Stage 1 boundary would be approximately 2.5km from the proposed development. It would be expected that only development such as taller apartment buildings would likely see the high-bay. Further assessment will be carried out during the VIA to confirm how visible the development would likely be from the Stage 1 area and potentially other areas within the wider Orchard Hills precinct boundary.

4.7 Landscape Character

During the last 15 years industrial development has become more prevalent within the region with further development in Erskine Park and the rezoning of rural lands in Kemps Creek and Orchard Hills. To the southeast the Mamre Road Precinct will deliver large scale warehousing and some of this is already seen from Luddenham Road. South Creek is zoned for environmental conservation and does provide a physical and visual buffer from the Mamre Road Precinct for visual receivers along Luddenham Road.

Western Sydney Airport is also having a major impact upon the surrounding area with new infrastructure links including rail and orbital roads being constructed along the boundary of the AIBP estate. Luddenham Road itself is the subject of future widening to accommodate larger volumes of traffic serving the area and airport.

The more immediate context surrounding the subject site is one of large lot rural dwellings with associated pastoral and agricultural land use. Several large areas of conservation bushland exist to the west. Luddenham Road is tree lined and groups of scattered trees are common within privately owned land.

5.0 DEVELOPMENT PROPOSALS

The information below is based on an assessment of architectural drawings provided by NettletonTribe and planning scope provided by Urbis.

5.1 Overall Design Proposals

The application proposes a single industrial manufacturing facility with a high-bay. Both truck and car access will be from a purpose built estate road, constructed as part of the AIBP estate subdivision. The development will also contain an office, ground floor car parking, loading & hard stand areas and landscaping (refer to Figures 11a and 11b).

5.2 Height / Scale / Levels

General ridge height is to be 14.7m. The high-bay is located to the western end and is expected to be approximately 39m in height.

5.3 Colour / Materials & Finishes

These are to be determined through the design process, but are likely to match other proposed development within the estate.

5.4 Landscaping

Landscaping will follow precedents already established for the estate and adjacent development. This will include ingenious and native large canopy trees to the eastern setback. The north, south and western boundaries also include a setback to incorporate landscaping. These should help to reduce visual impacts by screening lower levels of the building.

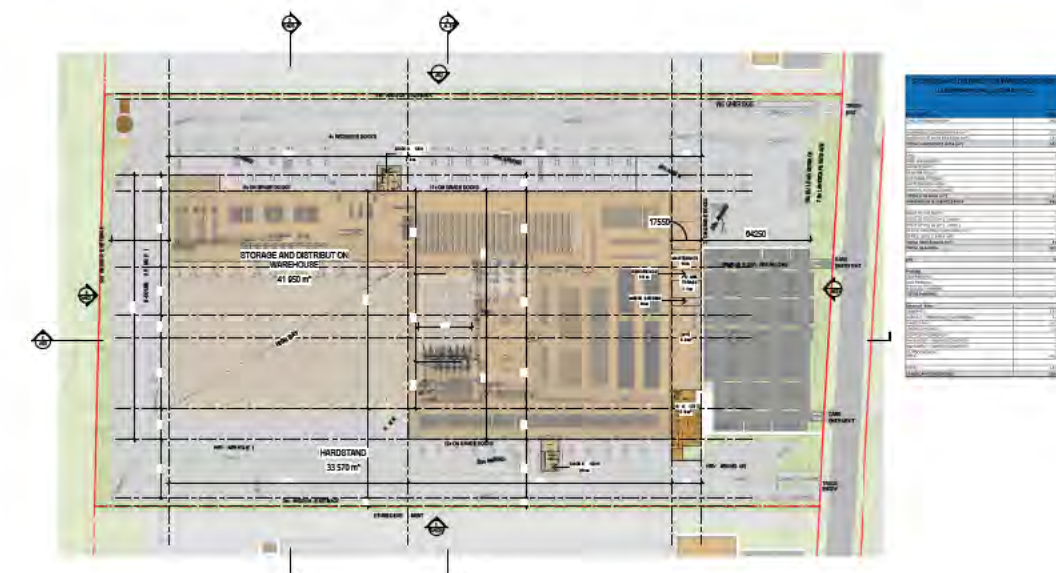


Figure 11a: DRAFT Warehouse GF Plan (Source: NettletonTribe)

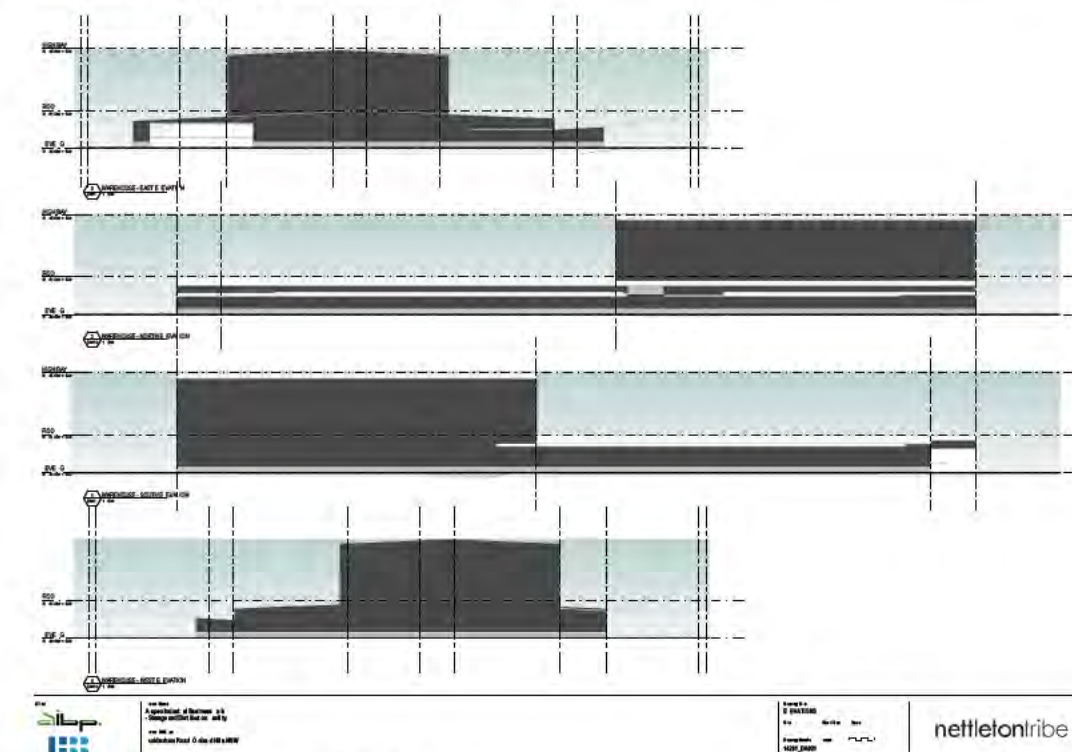


Figure 11b: DRAFT Warehouse Elevations (Source: NettletonTribe)

6.0 VIEWPOINT ANALYSIS

6.1 - Viewpoint 1 - 443-457 Luddenham Road, Luddenham

Visual Sensitivity

The view was taken from the rear of a large rural property in front of an outdoor terrace and looks towards the AIBP estate, it is located in a slightly elevated position within the landscape.

Residential visual receptors are generally more critical of their view as any change in view created by a development are usually permanent and often seen from primary or secondary living spaces on a daily basis. The view is currently absent of large scale industrial development, though the North South Rail link is likely to be seen to the west when completed.

It can be considered that views have some scenic quality with the edge of the subject site seen containing bushland and therefore, the sensitivity for this receptor to the development would be **high**.

Potential Visibility of the Proposal

As is demonstrated by the photomontage opposite, the high-bay component of the development would be seen above the tree canopy line surrounding the site.

Time and Date of Baseline Photograph	Category	Definition
7th Feb 2024 - 1.56pm	Type of viewer	Residents of the rural property.
	Duration of view	Long - views from garden areas and potentially through windows from inside the property would be experienced on a frequent basis.
	Approx Viewing distance to Lot Boundary and Elevation	1.2km 66.5m AHD
	Landscape compatibility	The landscape immediately visible to the foreground of this vantage point is separate to that of the site and forms part of the rural property. To the background bushland is seen to the south of the site. The high-bay will be seen above the canopy line and introduce a new built form element into the view that would be noticeable to the receptor.

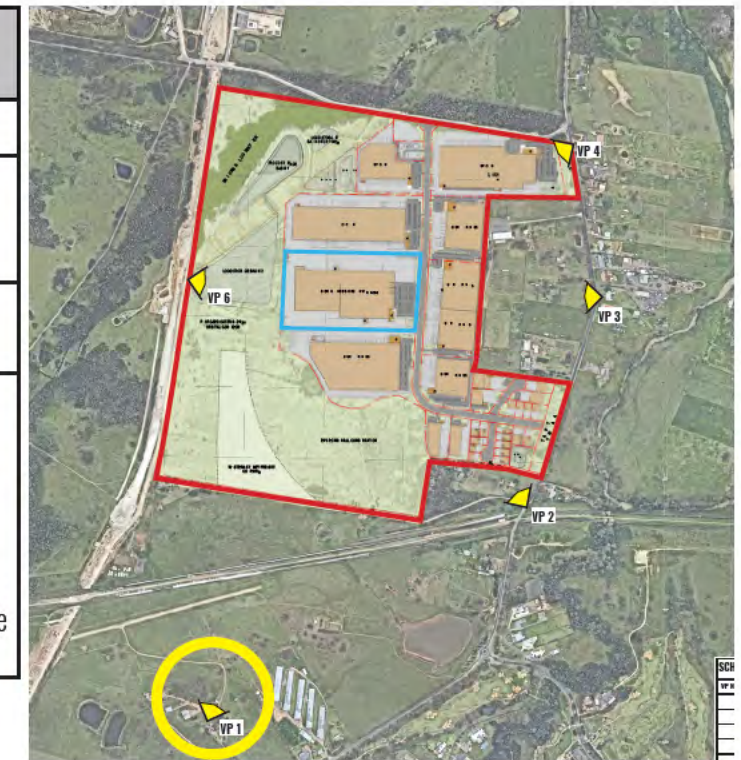


Figure 12a: Viewpoint Location 1



Figure 12b: Viewpoint 1 - Existing Panoramic Photograph - Looking North

Camera Lens - 50mm

Approx Angle of View - 90° Cylindrical Stitched Panorama

FOR CONTEXT ONLY



Baseline Photo



Massing Photomontage

Figure 12c: Viewpoint 1 - 443-457 Luddenham Road, Luddenham - Looking North (Massing Photomontage)

Approx Cylindrical Panoramic Angle of View - 67°

6.2 - Viewpoint 2 - Luddenham Road (Approach from South), Orchard Hills

Visual Sensitivity

The baseline photograph was taken from the eastern side of Luddenham Road on the grass verge and adjacent to property no. 320. It looks northwest and towards properties on the western side of the road such as no. 319. The view is fairly typical of those seen along Luddenham Road with rural properties surrounded by pastoral and agricultural lands. The AIBP site boundary is seen to the right and marked by black shipping containers.

The viewpoint was selected to predominantly represent motorists traveling in a northerly direction along Luddenham Road. The property east close to this location would also receive a similar type of view, though this might be less open due to the presence of canopy trees. The view contains pastoral lands and rural dwellings, due to the lower elevation long distance views across to the west are not possible. It is judged that the sensitivity of this view is **medium**.

Potential Visibility of the Proposal

Tree planting and earthworks created by the AIBP estate will be apparent as a new element within the view, however this is subject to a separate DA application. The proposed development would be screened from this viewpoint through a combination of existing topography and approved earthworks from the AIBP estate.

Time and Date of Baseline Photograph	Category	Definition
7th Feb 2024 - 1.39pm	Type of viewer	Passengers of motor vehicles traveling along Luddenham Road in a northerly direction.
	Duration of view	Short - due to the presence of existing vegetation and the angle of the view. Passengers would need to look west to see the development and receptors will be traveling along the road at speed.
	Approx Viewing distance to Lot Boundary and Elevation	640m 39.3m AHD
	Landscape compatibility	The landscape to the foreground is rural with larger lot properties present. The proposed development would effectively be screened at this viewpoint and would not be visible to visual receptors.

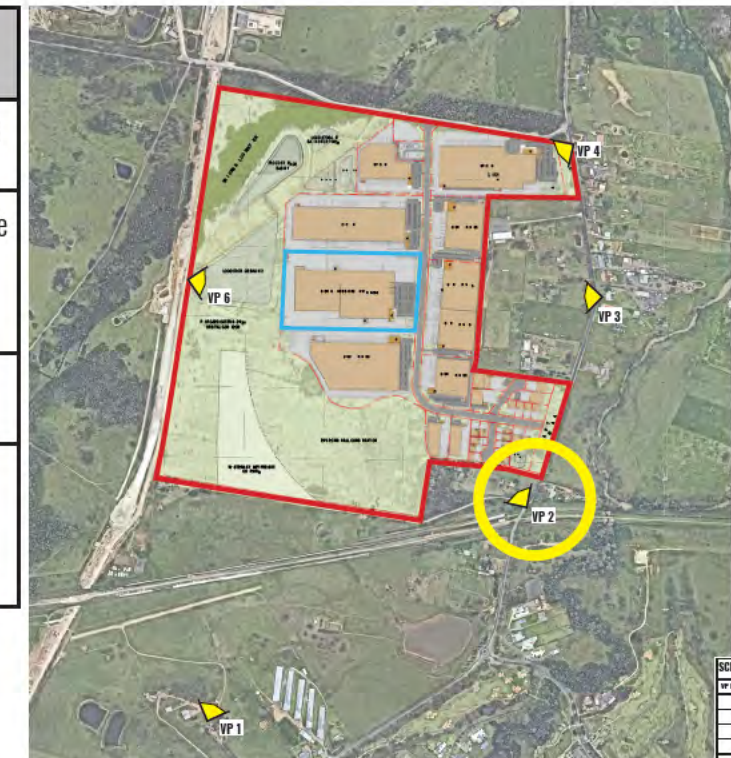


Figure 13a: Viewpoint Location 1



Figure 13b: Viewpoint 2 - Existing Panoramic Photograph - Looking Northwest

Camera Lens - 50mm

Approx Angle of View - 90° Cylindrical Stitched Panorama

FOR CONTEXT ONLY

Approximate Extent of Proposed Development



Baseline Photo



Massing Photomontage

Figure 13c: Viewpoint 2 - Luddenham Road (Approach from South), Orchard Hills - Looking Northwest (Massing Photomontage)

Approx Cylindrical Panoramic Angle of View - 67°

6.3 - Viewpoint 3 - Adjacent to 262 Luddenham Road, Orchard Hills

Visual Sensitivity

Viewpoints 3 and 4 represent the type of views that would be experienced by properties on the eastern side of Luddenham Road. View corridors will change depending on the exact location and some dwellings may have less open views than are seen in Figure 14b, this would be due to the presence of existing trees to the western side of the road. Looking west the topography rises up to the AIBP site with rural properties surrounded by pastoral lands.

The view contains pastoral lands and rural dwellings, due to the lower elevation long distance views across to the west are not possible. However, it is likely that residents at this location would hold their view in high regard and there is the absence of any large scale development. It is judged that the sensitivity for this receptor to the development would be **high**.

Potential Visibility of the Proposal

The majority of the proposed development would be screened by existing vegetation within the private properties to the east of the AIBP boundary. It is likely that only very small view corridors through the tree line to high-bay would be seen. The proposed development will form a minor constituent of the view and being at sufficient distance to become a small component.

Time and Date of Baseline Photograph	Category	Definition
7th Feb 2024 - 1.29pm	Type of viewer	Residential dwellings to the east and passengers of motor vehicles traveling along Luddenham Road.
	Duration of view	Short - for vehicles traveling along Luddenham Road. Long - for residents of rural properties on the eastern side of Luddenham Road.
	Approx Viewing distance to Lot Boundary and Elevation	570m 37.3m AHD
	Landscape compatibility	The landscape to the foreground is rural with larger lot properties present. This is separate to the site which is located beyond. The proposed development would become a small element through the vegetation line and therefore, compatible with the view.

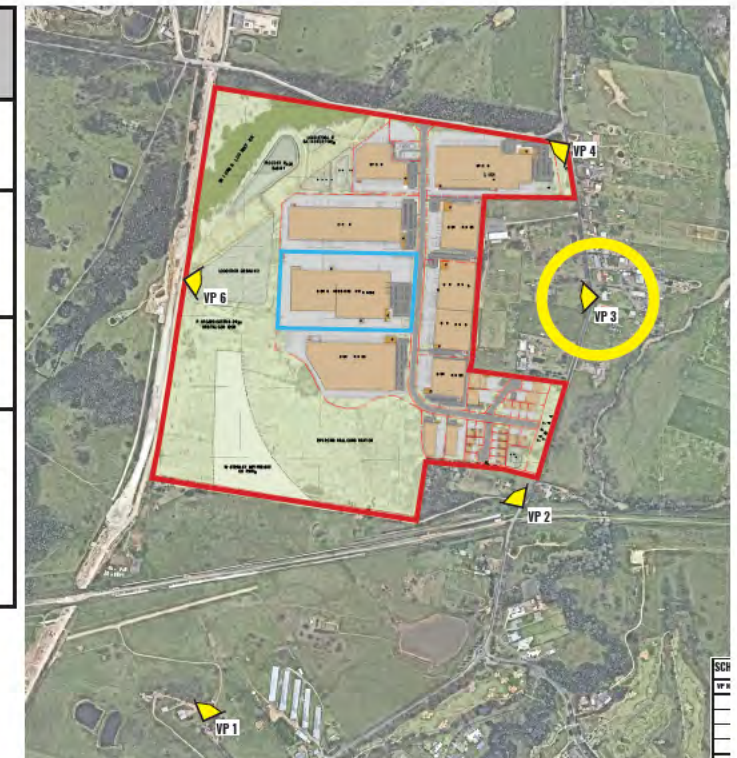


Figure 14a: Viewpoint Location 1



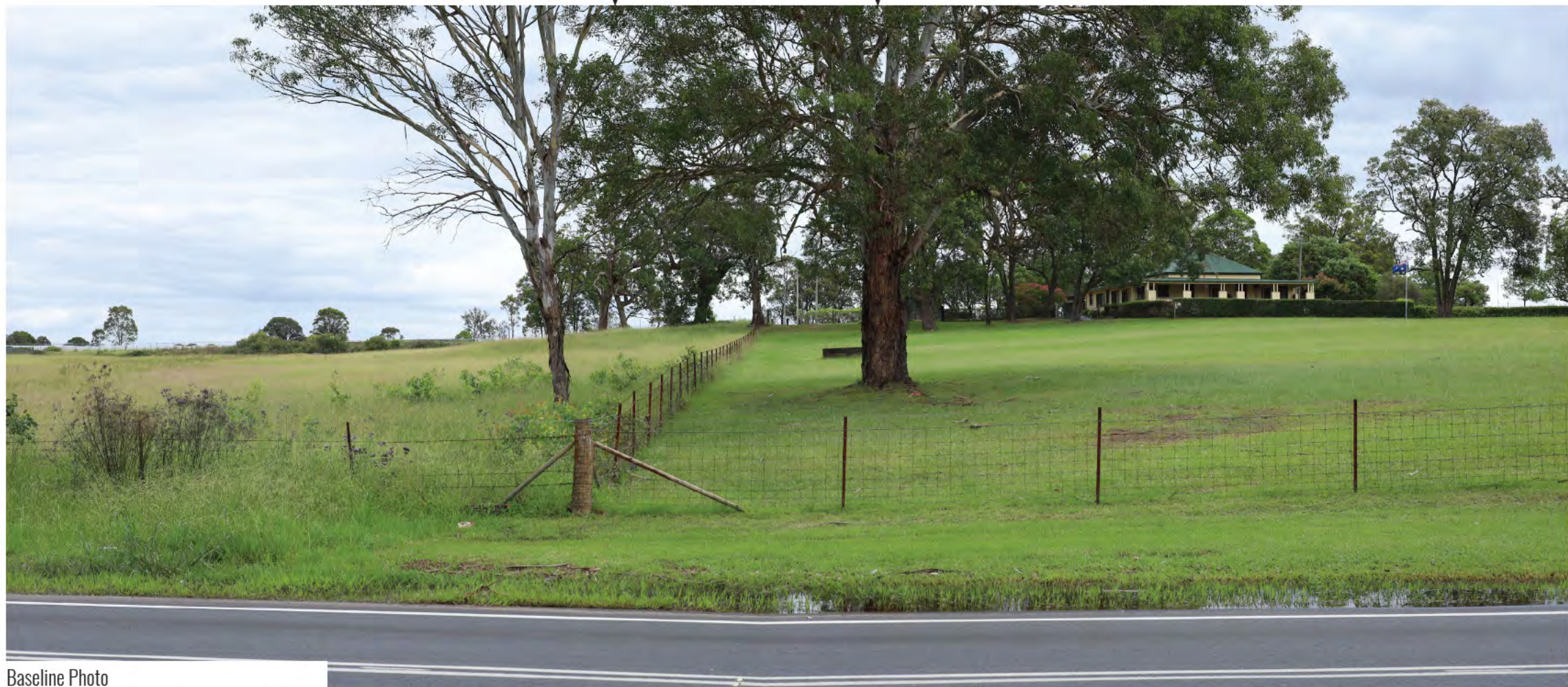
Figure 14b: Viewpoint 3 - Existing Panoramic Photograph - Looking West

Camera Lens - 50mm

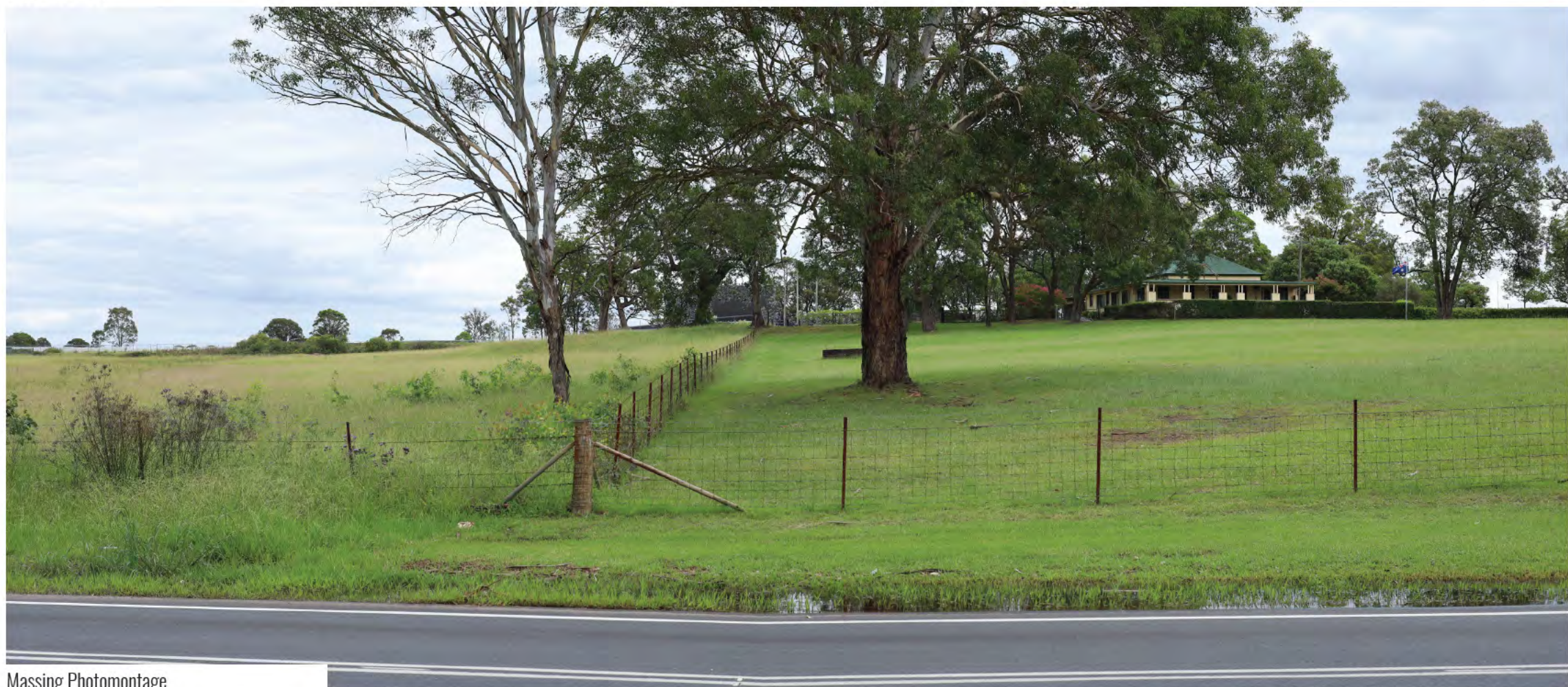
Approx Angle of View - 90° Cylindrical Stitched Panorama

FOR CONTEXT ONLY

Approximate Extent of Proposed Development



Baseline Photo



Massing Photomontage

Figure 14c: Viewpoint 3 - Adjacent to 262 Luddenham Road, Orchard Hills - Looking West (Massing Photomontage)

Approx Planar Panoramic Angle of View - 53.5°

6.4 - Viewpoint 4 - Luddenham Road (Adjacent to Estate Boundary), Orchard Hills

Visual Sensitivity

The baseline photograph was taken from the eastern side of Luddenham Road on the grass verge and adjacent to property no. 202, it looks southwest and into AIBP. The current view is one of pastoral and agricultural land with an avenue of trees along the site boundary to Luddenham Road. The AIBP site boundary is seen to the left and marked by black shipping containers.

Longer distance views are limited by topography and the avenue of trees along Luddenham Road. However, the view is presently absent of any large scale development and is likely to be valued by residential receptors. It is judged therefore, that the sensitivity of this receptor to the development would be **high**.

Potential Visibility of the Proposal

When assessing the development in isolation only the high-bay would be visible to the receptor forming a new and recognisable element. However, future development within Lot 1 to the foreground of the view would prevent any views of the proposal.

Time and Date of Baseline Photograph	Category	Definition
7th Feb 2024 - 1.19pm	Type of viewer	Residential dwellings to the east and passengers of motor vehicles traveling along Luddenham Road.
	Duration of view	Short - for vehicles traveling along Luddenham Road. Long - for residents of rural properties on the eastern side of Luddenham Road.
	Approx Viewing distance to Lot Boundary and Elevation	625m 39.2m AHD
	Landscape compatibility	Presently the landscape to the foreground is rural with larger lot properties. This will change through future industrial development within AIBP estate. The proposed development would become a recognisable element to the receptor. However, following development of Lot 1 the proposal would no longer be visible.

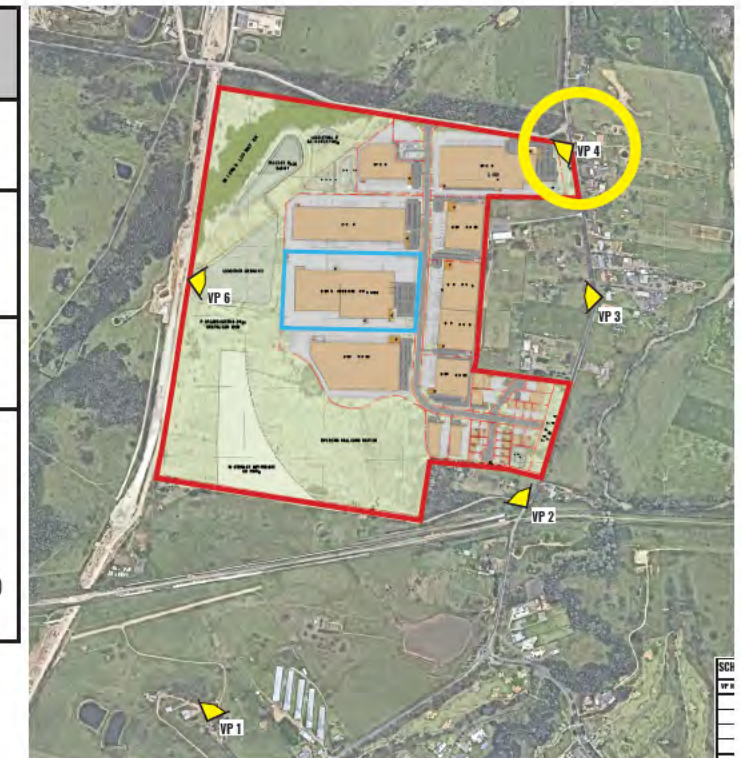


Figure 15a: Viewpoint Location 1



Figure 15b: Viewpoint 4 - Existing Panoramic Photograph - Looking Southwest

Camera Lens - 50mm | Approx Angle of View - 90° Cylindrical Stitched Panorama | FOR CONTEXT ONLY

Approximate Extent of Proposed Development



Baseline Photo



Massing Photomontage

Figure 15c: Viewpoint 4 - Luddenham Road (Approach from North), Orchard Hills - Looking West (Massing Photomontage)

Approx Planar Panoramic Angle of View - 53.5°

6.5 - Viewpoint 5 - Luddenham Road (Approach from North), Orchard Hills

Visual Sensitivity

The baseline photograph was taken from the western side of Luddenham Road on the grass verge 100m south of a small property located at no. 117-199. The current view is one of pastoral and agricultural land with the development site beyond the bushland that is seen in the background of the view.

This view was selected predominantly to represent motorists traveling in a southerly direction along Luddenham Road. However, there are also rural properties to the south and southwest of this location that would likely experience a similar type of view. The baseline image is typical of the immediate surrounds with pastoral lands framed by bushland. There are detractors within the landscape including electrical pylons which run across the view. The sensitivity of this receptor to the development would be **medium**.

Potential Visibility of the Proposal

The proposed development would not be seen at this location with even the high-bay hidden by the exiting tree line at the edge of the AIBP estate.

Time and Date of Baseline Photograph	Category	Definition
4th Mar 2024 - 11.47am	Type of viewer	Passengers of motor vehicles traveling along Luddenham in a southerly direction
	Duration of view	Short - visual receptors will be traveling at 80kms towards the site.
	Approx Viewing distance to Lot Boundary and Elevation	1km 35.3m AHD
	Landscape compatibility	The landscape immediately visible to the foreground of this vantage point is separate to that of the site and shows private land outside of the AIBP boundary. The amenity of the landscape visible to the receptor would be unaffected by the proposed development.

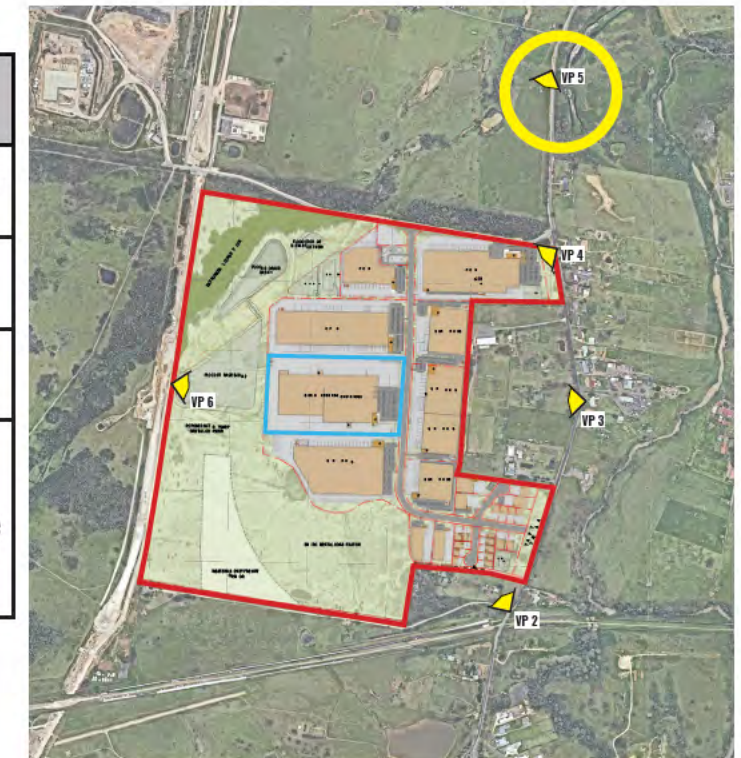


Figure 16a: Viewpoint Location 1



Figure 16b: Viewpoint 5 - Existing Panoramic Photograph - Looking Southwest

Camera Lens - 50mm | Approx Angle of View - 90° Cylindrical Stitched Panorama

FOR CONTEXT ONLY



Baseline Photo



Massing Photomontage

Figure 16c: Viewpoint 5 - Luddenham Road (Approach from North), Orchard Hills - Looking South (Massing Photomontage)

Approx Planar Panoramic Angle of View - 53.5°

6.6 - Viewpoint 6 - View from future North South Rail Link, Orchard Hills

Visual Sensitivity

This viewpoint was selected to be representational of potential views by commuters from the future north-south rail link that runs along the western site boundary. This is being constructed as part of new transport infrastructure to service Western Sydney Airport. The view is open with pasture grass and bushland to the north.

Metro trains are likely to be traveling at speed past the subject site so views would be transitional and therefore, experienced for a short period of time only. Though there is some scenic value evident in terms of green open space and pastoral land, there are some landscape detractors in the form of electricity pylons and the new Metro substation building. Earthworks as part of a separate DA application now form part of the baseline. Therefore, it is judged that the sensitivity of this view is **medium**.

Potential Visibility of the Proposal

The proposed development will be highly visible at a distance of only 300m from the metro line. This will form a new and recognisable element within the view which would be recognised by the receptor as an industrial development. Views are at close/medium range with a moderate horizontal extent of the view affected. Proposed planting within the western and southern landscape setbacks will allow for tree planting which will screen lower parts of the warehouse.

Time and Date of Baseline Photograph	Category	Definition
7th Feb 2024 - 12.40pm	Type of viewer	Commuters traveling on future Metro trains.
	Duration of view	Short - metro trains will be traveling at high speed past the site.
	Approx Viewing distance to Lot Boundary and Elevation	300m 42.3m AHD
	Landscape compatibility	The landscape immediately visible to the foreground from part of the AIBP estate. This is subject to approved works under a subdivision DA. Other lots are subject to individual applications for industrial development. Therefore, the development will be compatible with other warehousing on the estate, though the high-bay will be taller than other built form.

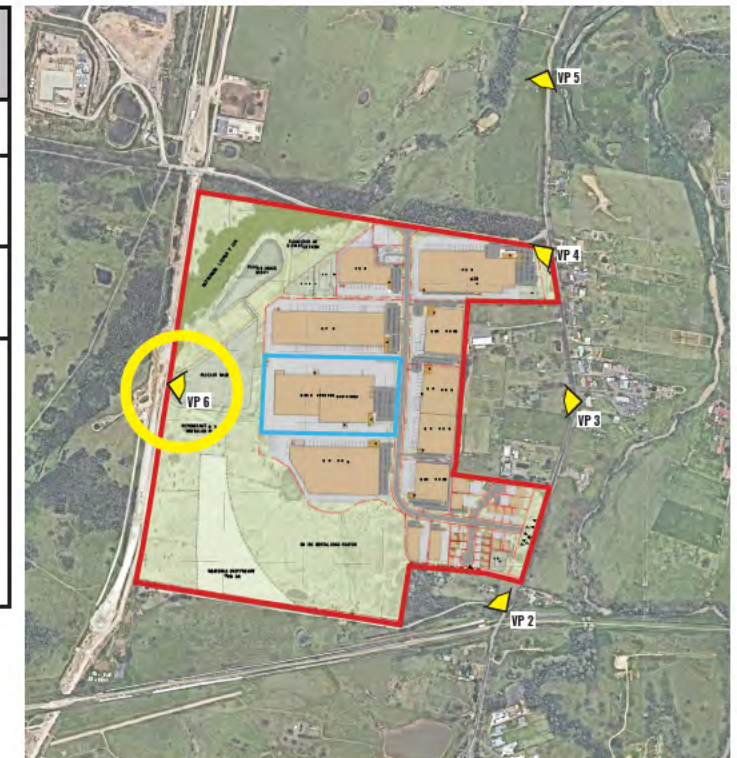


Figure 17a: Viewpoint Location 1



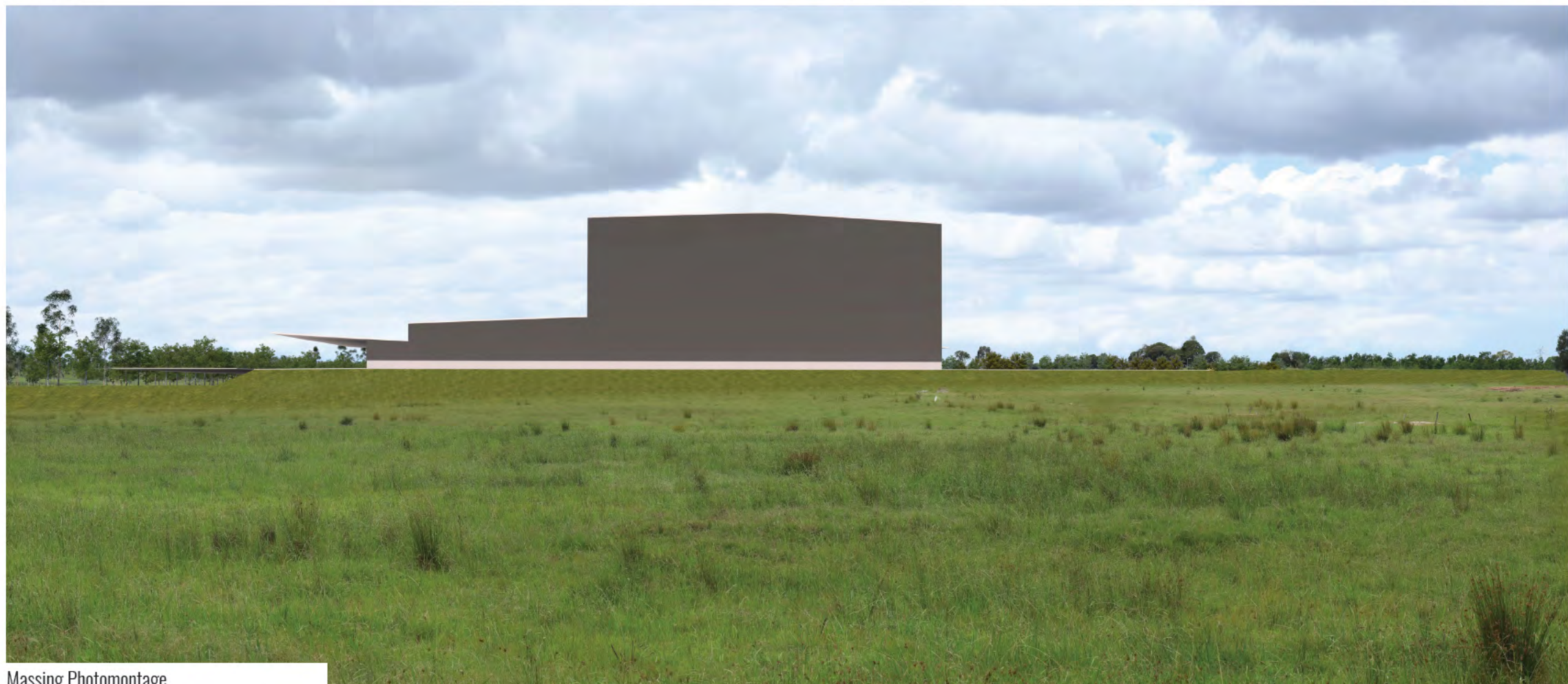
Figure 17b: Viewpoint 5 - Existing Panoramic Photograph - Looking East

Camera Lens - 50mm | Approx Angle of View - 90° Cylindrical Stitched Panorama

FOR CONTEXT ONLY



Baseline Photo



Massing Photomontage

Figure 17c: Viewpoint 6 - View from future North South Rail Link, Orchard Hills - Looking Northeast (Massing Photomontage)

Approx Planar Panoramic Angle of View - 53.5°

7.0 CONCLUSIONS & RECOMMENDATIONS

The purpose of this Visual Scoping Analysis is to understand the potential zone of visual influence of the proposed development and identify locations within the surrounding context that have the potential to receive visual impacts. A full Visual Impact Assessment (VIA) will be undertaken through the SSDA process and be included in the EIS.

This report is supported by on-site analysis, desktop study, drone photography and photomontages of the proposal.

Based on the development proposals two locations in the immediate vicinity were identified as having the potential to receive adverse visual impacts these are:

- 443-457 Luddenham Road, Luddenham - (VP1)
- View from future North South Rail Link, Orchard Hills- (VP6)

The effect of surrounding existing topography, vegetation and proposed earthworks to the AIBP estate will result in many locations along Luddenham Road either being screened from the proposed development or only receiving partial filtered views.

In the medium term, following the completion of future development within AIBP and expected development to E4 zoned land adjacent to Luddenham Road, the proposed development is likely to be fully screened from view from many locations within public and private lands.

Lower parts of the building will not be visible for the majority of receptors with only the high-bay visible. It is recommended that particular attention is given to this element in the form of architectural treatments in order to help mitigate visual impacts from the sensitive receivers.

Further analysis will be carried out for the full VIA to understand any impacts of views at greater distances.

8.0 GLOSSARY OF TERMS

Term	Definition
GLVIA	Guidelines for Landscape and Visual Impact Assessment (UK Landscape Institute)
LVIA	Landscape and Visual Impact Assessment
VIA	Visual Impact Assessment
LEP	Local Environment Plan
DCP	Development Control Plan
GFA	Gross Floor Area
Baseline	The existing current condition / character of the landscape or view
Landscape Sensitivity	How sensitive a particular landscape is to change and its ability to accept the development proposals.
Visual Receptor	A group or user experiencing views of the development from a particular location
Visual Sensitivity	The degree to which a particular view can accommodate change arising from a particular development, without detrimental effects.
Panoramic Angle of View or Field of View	Single DSLR 50mm lens photographs are stitched together to form a combined panoramic image. The angle of view is the extent of the image shown on the viewpoint sheet. A full frame single image is 39.6°
Viewing Distance	The distance from the point of projection to the image plane to reproduce correct linear perspective.

APPENDIX D RISKCON PRELIMINARY ADVICE

Consultants Advice Notice

Project:	HBB Storage Warehouse	Ref No.:	RCE-25003
From:	Chris Butson	Date:	17 th March 2025
		Revision:	0
	Attention	Company	Email
To:	Mike Lloyd	HB & B Property Pty Ltd	mlloyd@hbbproperty.com.au

1.0 Introduction

HB & B Property Pty Ltd (HBB) are developing a multi-stage warehouse development at the Alspeck Industrial Business Park. One of the proposed tenants in the warehouse development plans to store Dangerous Goods (DGs) which require assessment under State Environmental Planning Policy Resilience and Hazards (SEPP-RH) to assess the development against storage and transport thresholds and ensure the development does not pose excessive risk to the surrounding land uses. This assessment shall be finalised by a competent person(s) in a separate document and included with the Development Application (DA) submission.

During consultation with the NSW Department of Planning and Environment (DPE), it was indicated that if the tenant were to exceed certain thresholds in the Protection of Environment Operations Act 1997 No 156 and the EPA regulations then the development would fall under a different approval pathway.

It has therefore been proposed to conduct an initial assessment of the proposed storages against these thresholds, separate to the SEPP-RH assessment, to demonstrate that the intended approval pathway is valid and the thresholds in the EPA regulations are not exceeded.

HBB has engaged Riskcon Engineering Pty Ltd (Riskcon) to conduct this assessment and provide this Consultants Advice Notice (CAN) to support the DA.

2.0 Thresholds and Chemical Classification

The proposed tenant is a beverage logistics company which receives, stores and distributes alcoholic and non-alcoholic beverages. As ethanol (alcohol) is flammable, it is classified as a Dangerous Good (DG) under the Australian Dangerous Goods Code. The code specifies, that alcoholic beverages with alcohol-by-volume (ABV) below 24% are not considered Dangerous Goods. Therefore, products such as beer and wine are not included in the assessment and only those products >24% ABV, such as spirits are considered.

The Protection of the Environment Operations Act 1997 No 156 specifies activities which may pose increased levels of environmental risk therefore requiring the premise to hold an Environmental Protection Licence (EPL). In Schedule 1 Part 1 of the Act, premise-based activities which may trigger the need for an EPL are defined, as the site does not manufacture or use the Dangerous Goods to be stored in any manner, the activities are considered 'Chemical Storage' and the threshold criteria is as follows:

- General chemicals capacity to store more than:
 - 20 tonnes of pressured gases
 - 200 tonnes of liquified gases
 - 2,000 tonnes of chemicals in any other form

Under the Environmental Planning and Assessment Regulation 2021, exceedance of these thresholds would mean the development is considered a 'Designated Development' triggering a different approval pathway to that currently intended.

3.0 Assessment

A stock keeping unit (SKU) export was provided as a 'worst-case scenario' in terms of storage quantity of Dangerous Goods. Each product was reviewed to identify those which are >24% ABV and are to be included in the assessment, the volume per container and number of containers per carton were then determined to estimate the total volume and weight of DGs to be stored.

Table 3-1 provides a summary of this assessment; the products have been removed to maintain the anonymity of the tenant. Based on the assessment, the maximum quantity of alcohol (DGs) as classified by the Australian Dangerous Goods Code is 51.8 tonnes. This is approximately 3% of the threshold values which would trigger the need for an EPL and a different approval pathway.

Table 3-1: Total DG Storage Quantity

Description	Vol. per container (L)	No. containers per carton	No. cartons to be stored	Total volume (L)	Total weight (T)*
Redacted	0.7	12	46	386	0.39
	0.7	6	102	428	0.43
	0.7	6	168	706	0.71
	0.7	6	49	206	0.21
	0.7	12	25	210	0.21
	0.7	6	199	836	0.84
	0.7	6	23	97	0.10
	0.7	6	232	974	0.97
	0.7	6	17	71	0.07
	1.125	6	360	2430	2.43
	0.7	12	234	1966	1.97
	0.7	12	70	588	0.59
	1.25	6	22	165	0.17
	0.7	12	100	840	0.84
	1	6	56	336	0.34
	0.7	6	9	38	0.04

Description	Vol. per container (L)	No. containers per carton	No. cartons to be stored	Total volume (L)	Total weight (T)*
	0.7	6	5	21	0.02
	0.7	6	6	25	0.03
	0.7	6	6	25	0.03
	0.7	6	124	521	0.52
	0.7	6	83	349	0.35
	1.125	6	284	1917	1.92
	0.7	6	40	168	0.17
	0.7	6	178	748	0.75
	0.7	6	1189	4994	4.99
	0.7	6	269	1130	1.13
	0.7	6	58	244	0.24
	1.125	6	16	108	0.11
	1	6	37	222	0.22
	0.7	12	5	42	0.04
	0.7	6	51	214	0.21
	0.7	6	136	571	0.57
	0.7	6	392	1646	1.65
	0.7	6	165	693	0.69
	0.5	6	452	1356	1.36
	0.7	6	101	424	0.42
	0.7	6	151	634	0.63
	0.7	12	21	176	0.18
	0.7	12	70	588	0.59
	0.7	6	64	269	0.27
	0.7	6	23	97	0.10
	0.7	6	5	21	0.02
	0.7	6	6	25	0.03
	1.125	6	19	128	0.13
	0.7	6	17	71	0.07
	0.7	6	7	29	0.03
	0.7	12	2	17	0.02
	1	6	19	114	0.11

Description	Vol. per container (L)	No. containers per carton	No. cartons to be stored	Total volume (L)	Total weight (T)*
	1.125	6	285	1924	1.92
	0.5	6	35	105	0.11
	0.7	12	47	395	0.39
	1.125	6	4	27	0.03
	0.7	12	17	143	0.14
	0.7	12	13	109	0.11
	0.7	12	41	344	0.34
	0.7	12	176	1478	1.48
	0.7	12	18	151	0.15
	0.7	12	1799	15112	15.11
	1	6	691	4146	4.15
Total:				51,799	51.8

* Based on alcoholic beverages having a density of 1,000 kg/m³.

4.0 Conclusions

Based on the provided assessment, the quantity of dangerous goods to be stored by the proposed tenant is significantly under the threshold values which would trigger a designated development status and the need for an EPL. As such, the current DA approval pathway should be maintained.

Kind regards,

Riskcon Engineering Pty Ltd

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