



STORAGE & DISTRIBUTION WAREHOUSE – 221-235 LUDDENHAM ROAD, ORCHARD HILLS

Environmental Impact Statement

Prepared for
HB+B PROPERTY
18 July 2025



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Project Code	P0007737
Report Number	FINAL



Acknowledgement of Country

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

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

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

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

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

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EIS DECLARATION

Project Details

Project name	Storage and Distribution Warehouse
Application number	SSD-81434988
Address	Level 2, 143 Macquarie Street, Sydney 2000

Applicant details

Applicant name	HB+B Property
Applicant address	Level 2, 143 Macquarie Street, Sydney 2000

Environment Impact Statement (EIS) prepared by

Name	Bruce Colman RPIA, REAP	Anthony Kong
Qualification	Bachelor of Town Planning Hons 1 (UNSW) Master of Environmental Management, University of Oxford	Bachelor of Planning (UNSW)

Declaration

Name	Bruce Colman
Qualification	BTP (Hons) MSc
Registration number	2769
Organisation registered with	Planning Institute of Australia

The undersigned declares that this EIS:

- has been prepared in accordance with Part 8 Division 5 of the *Environmental Planning and Assessment Regulation 2021*.
- contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates.
- does not contain information that is false or mis-leading;
- addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project.
- identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments.
- has been prepared having regard to the Department's *State Significant Development Guidelines - Preparing an Environmental Impact Statement*.
- contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development.
- contains a consolidated description of the project in a single chapter of the EIS;
- contains an accurate summary of the findings of any community engagement; and
- contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.

Signature Bruce Colman, Director (RPIA)
REAP no. 2769



18. July 2025

GLOSSARY AND ABBREVIATIONS

Reference	Description
ACHAR	Aboriginal Cultural Heritage Assessment Report
ACM	Asbestos Containing Material
AEP	Annual Exceedance Probability
AHD	Australia Height Datum
AHIMS	Aboriginal Heritage Information Management System
AIA	Arboricultural Impact Assessment
ANEF	Australian Noise Exposure Forecast
AQIA	Air Quality Impact Assessment
ARI	Average Recurrence Interval
ASS	Acid Sulphate Soils
BAM	Biodiversity Assessment Method
BC Act	Biodiversity Conservation Act 2016
BC Reg	Biodiversity Conservation Regulation 2017
BCA	Building Code of Australia
BDAR	Biodiversity Development Assessment Report
CBD	Central Business District
CEEC	Critically Endangered Ecological Community
CDA	Concept Development Application
CEMP	Construction Environmental Management Plan
CMP	Construction Management Plan
COPC	Contaminants of Potential Concern
CPCP	Cumberland Plain Conservation Plan
CTMP	Construction Traffic Environmental Plan
CWC	Connecting with Country
DCP	Development Control Plan
DP	Deposited Plan
DPHI	New South Wales Department of Planning, Housing and Infrastructure
DSI	Detailed Site Investigation

Reference	Description
EDC	Estimated Development Cost
EIS	Environmental Impact Statement
EP&A Act	Environmental Planning and Assessment Act 1979
EPA Regulation	Environmental Planning and Assessment Regulation 2021
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
EIS	Environmental Impact Statement
EPA	New South Wales Environment Protection Authority
EPI	Environmental Planning Instrument
ESCP	Erosion and Sediment Control Plan
ESD	Ecologically Sustainable Development
GANSW	Government Architect New South Wales
GFA	Gross Floor Area
GTP	Green Travel Plan
HIPAP	Hazardous Industry Planning Advisory Paper
HIS	Heritage Impact Statement
LAeq	A frequency-weighted Equivalent Continuous Sound Level
LEC	Land Environment Court New South Wales
LEP	Local Environmental Plan
LGA	Local Government Area
LSPS	Local Strategic Planning Statement
MNES	Matters of National Environmental Significance
MUSIC	Model for Urban Stormwater Improvement Conceptualisation
NML	Noise Management Level
NRAR	Natural Resource Access Regulator
NSW	New South Wales
NVIA	Noise and Vibration Impact Assessment
OEMP	Operational Environmental Management Plan
R&H SEPP	State Environmental Planning Policy (Resilience and Hazards) 2021
PAD	Potential Archaeological Deposit
PBP	Planning for Bushfire Protection

Reference	Description
PCT	Plant Community Type
PMF	Probable Maximum Flood
POM	Plan of Management
PSI	Preliminary Site Investigation
Planning Systems SEPP	State Environmental Planning Policy (Planning Systems) 2021
SAII	Serious and Irreversible Impacts
SARs	Commonwealth Supplementary Assessment Requirements
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SIA	Social Impact Assessment
SIDRA	Signalised & Unsignalised Intersection Design and Research Aid
Site	Lot 1 in Deposited Plan 1293805
SSD	State Significant Development
SSDA	State Significant Development Application
T&I SEPP	State Environmental Planning Policy (Transport and Infrastructure) 2021
TfNSW	Transport for New South Wales
TIA	Traffic Impact Assessment
UXO	Unexploded Ordnance
VIA	Visual Impact Assessment
VIS	Vegetation Integrity Score
WSAP	Western Sydney Aerotropolis Plan
WSAPP	Western Sydney Aerotropolis Precinct Plan
WCM	Water Cycle Management
WMP	Waste Management Plan
WSUD	Water Sensitive Urban Design
WWTP	Wastewater Treatment Plant

EXECUTIVE SUMMARY

Overview

This Environmental Impact Statement (**EIS**) has been prepared by Urbis Ltd (**Urbis**) on behalf of HB+B Property (HB+B) (**the applicant**). The EIS is submitted to the NSW Department of Planning, Housing and Infrastructure (**DPHI**) in support of a State Significant Development Application (**SSDA**) for the site at 221-235 Luddenham Road, Orchard Hills (**the site**).

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

The vision for the project is to deliver a high-quality, state-of-the-art storage and distribution warehouse. The proposed Storage and Distribution Warehouse emulates a modern, high-quality industrial facility which will support the establishment of the Alspec Industrial Business Park (**AIBP**). The AIBP seeks to set a benchmark for warehousing and logistics developments.

The proposed development seeks detailed approval for the construction and operation of a new warehouse, to be used as a Storage and Distribution Warehouse within the AIBP. The SSDA seeks consent for:

- 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 floor area of 48,157sqm; broken down as follows:
 - Warehouse area: 46,314sqm
 - Office Area: 1,843sqm
- 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 10,134sqm (10%).

The proposed Storage and Distribution Warehouse has an estimated development cost (**EDC**) of \$171,807,325 (Excl GST). The project is therefore classified as a State Significant Development (**SSD**) under Schedule 1 of the State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP), development that has a CIV of more than \$50 million for the purpose of Warehouse or Distribution Centre.

An aerial photograph of the site detailing the development footprints is provided at **Figure 1**.

Figure 1 Aerial Photograph



Source: Urbis

The Project

This SSDA forms part of the larger AIBP estate which was subject to a recent Planning Proposal that has been approved by Penrith City Council (Council). The Penrith Local Environmental Plan 2010 (PLEP) was updated and complete in April 2024, and the latest amendment was 20th May 2024.

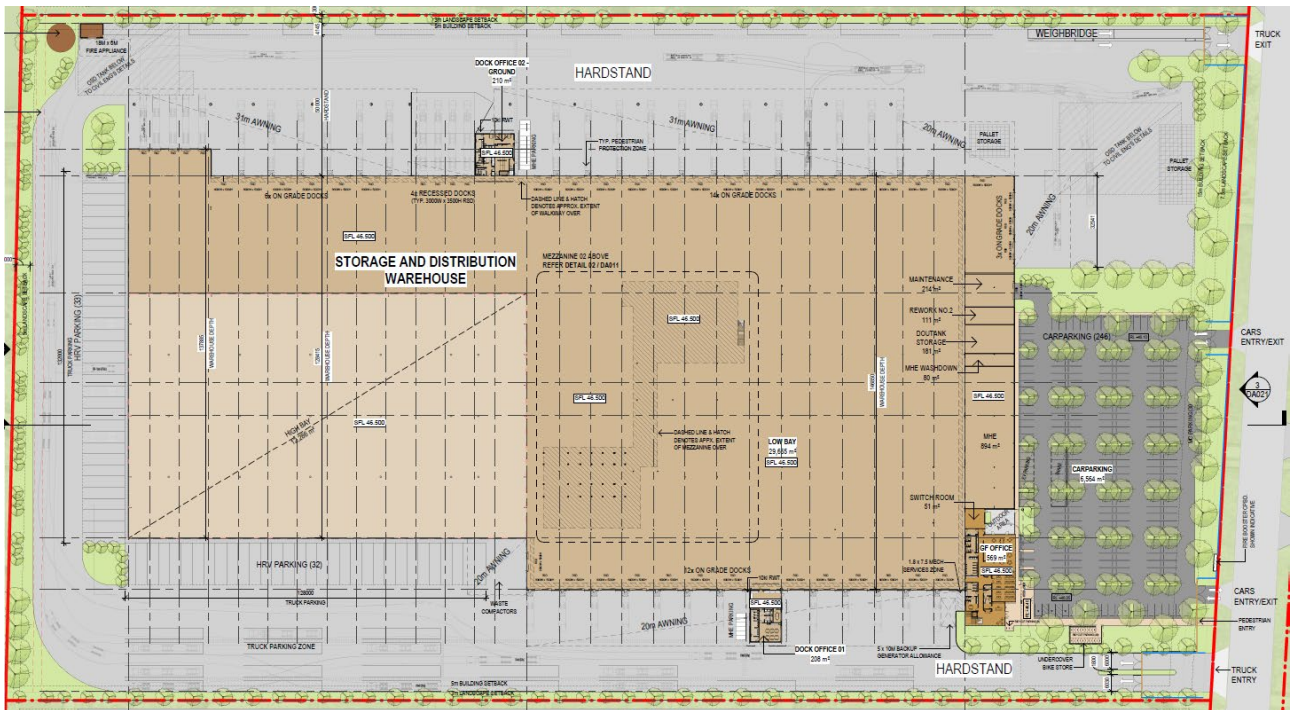
In addition, the AIBP has several subsequent State and local development applications. A summary of each application is described in **Section 1.3** of the EIS.

The proposed developments key objectives include:

- Deliver a high-quality, state-of-the-art storage and distribution warehouse.
- Contributing to the Alsip Industrial Business Park (AIBP) vision of becoming a world-class warehousing, logistics and employment precinct that unlocks economic opportunities for the area.
- Deliver employment floorspace and industrial land in close proximity to the Western Sydney International Aerotropolis (WSI).
- Deliver a green and cool warehouse that employs landscaping to integrate with the AIBP and surrounding ecological environment.

The key elements of the project are detailed within the Architectural Plans prepared by Nettleton Tribe at **Appendix J**. The proposed site plan and photomontage is provided at **Figure 2** and **Figure 3**.

Figure 2 Proposed Site Plan



Source: Nettleton Tribe

Figure 3 Photomontage



Source: Nettleton Tribe

Community and Stakeholder Engagement

Community and stakeholder engagement has been undertaken by Urbis and the Project Team in the preparation of the SSDA. This includes direct engagement and consultation with:

- Traditional Custodians;
- Adjoining landowners and occupants;
- Government, agency and utility stakeholders

The outcomes of the community and stakeholder engagement have been incorporated into the proposed development and are discussed in detail at **Section 5** and **Appendix T** of this EIS.

Strategic Justification

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

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

The project is a positive development outcome for the site and surrounding area for the reasons outlined in **Table 1**.

Table 1 Summary of Development Outcomes

Matter	Response
Design Excellence / Better Placed	This project addresses the Better Placed objectives and achieves good design through a high-quality, modern, and sustainable architectural and landscape design.
The project is consistent with strategic planning policies	▪ Greater Sydney Region Plan: A Metropolis of Three Cities ▪ Our Greater Sydney 2056: Western Parkland City District Plan ▪ Penrith Local Strategic Planning Statement
The project is consistent with State and local development controls	The development is permissible with consent and meets the relevant statutory requirements of the relevant environmental planning instruments, including; ▪ Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act); ▪ NSW Biodiversity Act 2016 (BC Act); ▪ Environmental Planning and Assessment Act 1979 (EP&A Act); ▪ Environmental Planning and Assessment Regulation 2021 (EP&A Regulation); ▪ 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) 2021 (SB SEPP); ▪ Penrith Local Environmental Plan 2010 (PLEP 2010).
The project minimises impacts on the natural environment	▪ The AIBP and proposed site is situated on a largely cleared rural landholding. ▪ The proposed development does not result in any adverse environmental or social impacts to the local amenity. The site is entirely zoned for

Matter	Response
	employment uses and is 'certified – urban capable land' under the Cumberland Plain Conservation Plan. ▪ The proposed development has also been informed by a series of environmental studies to ensure there are no significant impacts on the natural environment. Where potential impacts have been identified recommendations have been made to ensure these can be adequately managed and mitigated. These studies include the detailed assessments of the acoustic, air quality, stormwater management, contamination, hazardous materials, waste and biodiversity impacts. ▪ The implementation of the recommended mitigation measures and proposed management plans will minimise any impacts to the natural environment.
The project minimises impacts on the built environment	The project has been prepared to minimise any visual or built form impacts and deliver a positive amenity outcome. ▪ The proposed built form contributes to the industrial land use character of the AIBP, contributes to the streetscape character and responds to the future desired character of the locality. ▪ A high-quality, corporate design outcome is achieved to create a world-class warehouse and logistics precinct. The building accentuates visual interest using façade articulation and use of high-quality materials and finishes. ▪ Perimeter landscaping is proposed to enhance visual amenity using tree planting and vegetation planting. This creates green, vegetated setbacks that filters views to the built form.
The project has positive social impacts	▪ The project is consistent and compatible with the sites zoning and future strategic direction as envisioned within the Penrith LSPS. The project will provide additional employment opportunities for the people of Penrith and Western Sydney.
The project has positive economic impacts	▪ The proposed development will stimulate positive social impacts and economic benefits as it will create construction and operation jobs.
The site is suitable for the project	▪ The proposed warehouse and distribution estate is permissible in the E4 General Industrial Zone and is consistent with the zone objectives under the Penrith LEP. ▪ The project is in line with relevant State and local strategic and statutory policies. ▪ The project has been designed with respect to both the emerging local character and future urban context of Orchard Hills and broader Penrith LGA, giving due consideration to the site-specific constraints and opportunities. ▪ The project is supported by the necessary infrastructure services with sufficient capacity to ensure the projects operational viability from both a utility, stormwater and traffic perspective. ▪ The detailed impact assessment conducted for the project demonstrates that the proposed development can proceed without any unacceptable environmental impact that cannot be mitigated through the implementation of specific measures or management plans.
The project is in the public interest	▪ The project will deliver a total of 159 ongoing, operational jobs which will provide immediate direct employment opportunities for Penrith and broader Western Sydney. ▪ The project aligns with both State and Local strategic plans, demonstrating substantial consistency with all relevant planning controls. ▪ No anticipated adverse environmental, social, or economic impacts are anticipated which cannot be mitigated or managed. ▪ A world-class warehouse and logistics estate is envisioned to support the industrial operations of Western Sydney and stimulate economic benefits for the region.

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

1. INTRODUCTION

This Environmental Impact Statement (EIS) has been prepared by Urbis Ltd (**Urbis**) on behalf of HB+B Property (**the applicant**). The EIS is submitted to the NSW Department of Planning, Housing and Infrastructure (**DPHI**) in support of a State Significant Development Application (**SSDA**) for the site at 221-235 Luddenham Road, Orchard Hills (**the site**).

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

1.1. APPLICANT DETAILS

The applicant details for the proposed development are listed in the **Table 2**.

Table 2 Applicant Details

Proponent	HB+B Property
Postal Address	Level 2, 143 Macquarie Street, Sydney 2000
ACN	84 604 992 458
Nominated Contact	Mike Lloyd mlloyd@hbbproperty.com.au

1.2. THE PROJECT

The proposed development seeks detailed approval for the construction and operation of a new warehouse, to be used as a Storage and Distribution Warehouse within the AIBP.

The SSDA seeks consent for:

- 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 floor area of 48,157sqm; broken down as follows:
 - Warehouse area: 46,314sqm
 - Office Area: 1,843sqm
- 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%).

A concurrent Planning Proposal is proposed to be lodged with Council to amend the height of building provisions applicable to the site. The proposed spot-rezoning will amend the height of buildings control to unlock the process in which the high-bay warehouse component can proceed. The high-bay warehouse is a valuable and in-demand industrial typology to meet the needs of logistics industries, which highlights the need to vary the building height standard.

The key objectives for the proposed development and the way in which these have been achieved are summarised in **Table 3**.

Table 3 Project Vision and Objectives

Objective	Proposed Development
Deliver a high-quality, state-of-the-art storage and distribution warehouse.	The proposed Storage and Distribution Warehouse emulates a modern, high-quality industrial facility that has undergone considerable architectural design. The built form was created with design excellence in mind to set a benchmark for warehousing and logistics developments. Architectural and landscape outcomes achieve an aesthetic, functional and sustainable warehouse.
The Alspec Industrial Business Park (AIBP) will become a world-class warehouse and logistics precinct.	The AIBP seek to establish a world-class warehouse and logistics precinct, embodying a corporate, high-quality, sustainable and cohesive estate. The architectural vision includes simple, rational, and well-proportioned buildings, accentuated by high-quality elements. Alspec products will be consistently showcased throughout the estate.
The AIBP unlocks economic opportunities for the area and establishes itself as an industrial and employment hub leveraging its proximity to the Western Sydney Aerotropolis.	The proposed development will create employment opportunities through the delivery of industrial land uses. The Storage and Distribution Warehouse will create construction and operational jobs for the Penrith LGA and broader Western Sydney region.
Create a green and cool warehouse that employs landscaping to integrate with the AIBP and surrounding ecological environment.	The proposed design integrates green infrastructure within the urban development through landscape treatments and planting of local indigenous and native plant species. This will enhance biodiversity outcomes and strengthen the amenity and resilience of the site.

A map of the AIBP and its surrounds is illustrated in **Figure 4**.

Figure 4 AIBP Aerial Map



Source: Nearmaps

1.3. PROJECT BACKGROUND

1.3.1. Project Story

Extensive engagement has been completed as part of the preparation of this SSDA. Recent engagement with key stakeholders including DPHI, Council, TfNSW, Sydney Metro, IPART and Sydney Water has occurred during separate development applications related to the AIBP, which has also helped inform considerations for this proposed development.

A summary of engagement completed as part of this application is outlined in **Section 5** of this EIS. This is described in detail within the Engagement Outcomes Report at **Appendix T**.

1.3.2. Background

1.3.2.1. Planning Proposal

The SSDA forms part of the larger AIBP estate which was subject to a recent Planning Proposal that has been approved by Council. The Penrith Local Environmental Plan was updated and complete in April 2024. The Local Environmental Plan came into operation on the 20th May 2024.

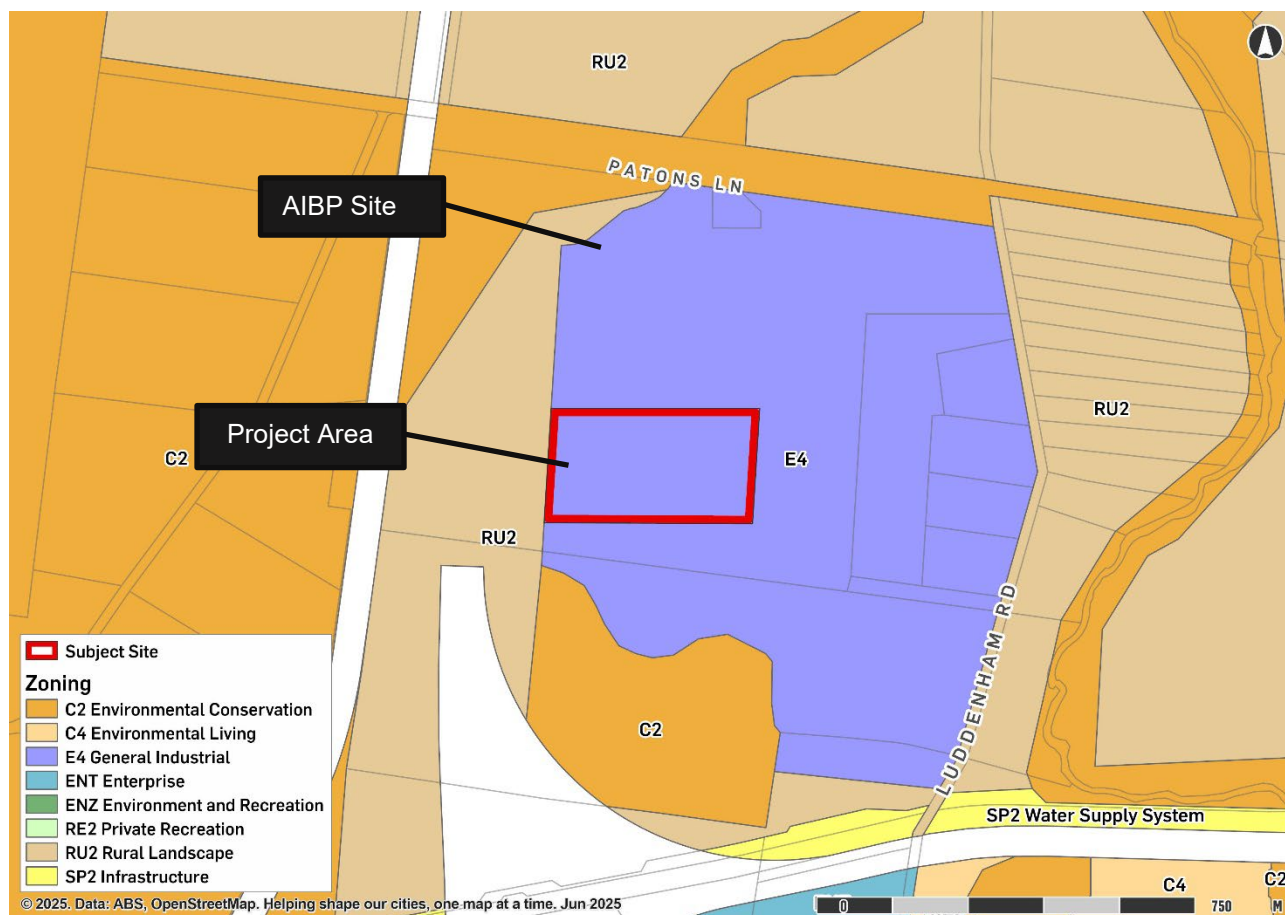
The AIBP Planning Proposal sought to rezone the central and eastern portion of the subject site to E4 General Industrial and partly C2 Environmental Conservation, under which warehouse and distribution centres are a permissible use.

Specifically, the planning proposal sought to:

- Rezone part of the site from RU2 Rural Landscape to the E4 General Industrial zone,
- 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. A minimum lot provision of 40 lots will apply to part of the site and a minimum lot density provision of 60 lots will apply to the remainder of the site,
- Maintain a 40 metre wide corridor of land zoned E4 General Industrial on the western side of Luddenham Road to allow for the future widening of Luddenham Road.

This established the framework under which this SSDA is being progressed. The Planning Proposal included the preparation of a Voluntary Planning Agreement with Council for the provision of certain infrastructure, including the upgrade to Patons Lane and traffic lights on Luddenham Road, which this development will rely on.

Figure 5 Planning Proposal – Land Zoning Map



Source: Penrith Council

1.3.2.2. Development Applications

The AIBP has several subsequent State and local development applications. A summary of each application is provided in the following table. The proposed AIBP Masterplan is illustrated in **Figure 6**.

Table 4 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.	Approved – 05 May 2025
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.	Response to Submissions
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
Southern Intersection DA	DA25/0318 The proposed development seeks to construct a new unsignalised intersection for access to the Alspeck Industrial Business Park (AIBP) estate road from Luddenham Road.	Under Assessment

Figure 6 AIBP Masterplan



Source: Nettleton Tribe

2. STRATEGIC CONTEXT

This section of the EIS describes the key features of the site and its relationship to its local context. It also discusses how the project aligns with relevant strategic planning policy. It identifies other projects that should be considered in assessing the cumulative impacts of the project and also outlines the potential feasible alternatives explored by the applicant.

2.1. KEY FEATURES OF SITE AND LOCALITY

The location of the site is illustrated in **Figure 7**, and is located within the central portion of Lot 1 in DP1293805 which forms part of the AIBP. The key features of the site are described in **Table 5** below. Photographs of the current site condition are provided in **Figure 8**.

Figure 7 Local Context Map



Source: Urbis

Table 5 Site and Locality Description

Characteristic	Description
Key Site Features	
Country	Dharug Country
Site Name	The site is located within the Alspeck Industrial Business Park (AIBP).
Address	221-235 Luddenham Road, Orchard Hills
Legal Description (Title Particulars)	Lot 1 DP 1293805

Characteristic	Description
Zoning	E4 General Industrial
Existing Use / Structures	No existing buildings or structures present on site.
Site Area	104,959m ²
Vehicular/Site Access	There is currently no existing access to the subject site within the AIBP. There is existing access off Luddenham Road into the broader AIBP and an internal estate road is proposed under DA24/0294 which will deliver direct access to the site.
Adjacent land uses North	The surroundings north of the site are predominantly rural residential and agricultural facilities. The Erskine Park Fire Service 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.
Adjacent land uses 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.
Adjacent land uses South	Immediately south of the site are more residential dwellings. Further south is the Northern Gateway Precinct of the Western Sydney Aerotropolis.
Adjacent land uses West	To the west of the site is an environmental conservation zone which is adjacent to a tributary of South Creek. To the northwest of the site is a waste management service relating to a recycling and landfill centre.
Topography	The site exhibits a gentle slope in topography. The site elevation ranges from approximately 38 m relative Australian Height Datum (mAHD) in the northern portion of the site adjacent to Patons Lane to 54 mAHD in the southern portion of the site.
Vegetation	The site is predominantly grassed, with some scattered trees.
Flooding/Overland Flow	The site is not identified as being affected by the flood planning area. However, there is surrounding flood impacts occurring within the broader AIBP within the north and eastern areas of the precinct which does not cross into the site.
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.
Aboriginal Archaeology	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. Following the approval of the Bulk Earthworks application, an AHIP application has been lodged with Heritage NSW. The AHIP is currently under assessment.
Bushfire	The site is identified as being bushfire prone land and affected by Vegetation Category 3.
Biodiversity	The subject site is part of the Greater Penrith to Eastern Creek Investigations Area under the Cumberland Plain Conservation Plan

Characteristic	Description
	(CPCP). It is classified as 'certified – Urban Capable Land' under the CPCP.
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.
Surrounding Locality	
Public Transport	The locality has limited access to public transport. There are no bus or train services in the immediate vicinity of the site. The Western Sydney Airport Metro line will have an Orchard Hills station.
Major Roads	The AIBP site currently has a vehicular access point from Luddenham Road. Patons Lane will be upgraded and is the subject of a future application with Council which will be lodged in 2025.
Any other key regional characteristics	The site is located immediately north of the Western Sydney Aerotropolis. It is in a key location in proximity to this strategic precinct and the Western Sydney Airport.

Figure 8 Site and 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

2.2. OTHER DEVELOPMENT IN THE AREA

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 / Development

SSDA Reference	Development Description	Current Status
SSD-7173	Altis Warehouse Facility 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	Approved (15/12/2016)

SSDA Reference	Development Description	Current Status
	Road and intersection works between Mamre Road and an internal estate road.	
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> Construction and operation of a chips/snack foods manufacturing facility to connect to the existing adjoining Snack Brands Warehouse and Distribution facility.	Approved (08/07/2022)
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 are addressed in **Section 6** of the EIS in accordance with the DPHI *Assessing Cumulative Impacts* guidelines.

2.3. AGREEMENTS WITH OTHER PARTIES

The applicant, HB+B, has entered in a Voluntary Planning Agreement (VPA) with Penrith City Council for the provision of key infrastructure for the Alspeck Industrial Business Park.

The executed application can be found at Council's website.¹

The agreement includes the upgrade to Patons Lane and a signalised intersection at Luddenham Road, which is the subject of a forthcoming Local Development Application with Council. This infrastructure will be operational prior to the occupancy of the warehouse which is the subject of this SSDA.

2.4. FEASIBLE ALTERNATIVES

Clause 192(1)(c) 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 project team examined several feasible alternatives to the proposed development as outlined in **Table 7**.

Table 7 Project 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 foregoes 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. Ultimately, not carrying out the development would be to maintain the current rural setting of the land which is not intended based on the site's rezoning to E4 General Industrial.
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 that are more strategically aligned with the strategic planning framework and commercially viable.
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. As such, the proposed development is strategically aligned as it delivers employment generating floorspace and creates job opportunities. The proposed development 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.

¹ https://www.penrithcity.nsw.gov.au/images/executed_luddenham_road_voluntary_planning_agreement-compressed.pdf

2.5. STRATEGIC PLANNING ALIGNMENT

The proposed development is aligned with the State, district and local strategic plans and policies applying to the site as outlined in **Table 8** below.

Table 8 Strategic Planning Consistency

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, in close proximity to the WSI and the Aerotropolis. This is through the creation of construction and operational jobs and providing employment generating floorspace that will attract industries into the region and help contribute to the regional job targets. The proposed development aligns with the Region Plan as it will unlock critical industrial land to grow economic opportunities for the region. The development of a storage and distribution warehouse will help support the freight and logistics network to be competitive and efficient. ▪ <i>Objective 15 The Eastern, GPOP 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 grow investment, business opportunities and 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 maximise the freight and logistics operations of industrial lands. ▪ <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>

Plan	Consistency
Penrith Local Strategic Planning Statement	The Penrith Local Strategic Planning Statement (LSPS) 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. The proposed high-bay component is a highly compatible and in-demand warehousing typology to support the needs of logistics industries. It will also contribute to the economic development of the LGA through its job creation. ▪ <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.

2.6. JUSTIFICATION SUMMARY

The project is considered to be aligned with the overall strategic context for these reasons:

- The project has considered the key site characteristics through a detailed analysis of the relevant constraints. The development can be achieved without having unacceptable environmental impacts in relation to traffic, noise, heritage, biodiversity and visual impacts. The site presents minimal environmental impacts and the land is 'certified – Urban Capable Land' under the Cumberland Plain Conservation Plan.
- The project has considered the wider locality including surrounding infrastructure, public transport and the cumulative impacts of other projects in accordance with DPHI's Cumulative Impact Assessment Guidelines for State Significant Projects.

- The project has considered feasible alternatives and how these would meet the objectives of the development, this includes the consequences of not carrying out the development. The analysis has found that the proposed storage and distribution warehouse 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 proposed development 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 project is aligned with the relevant State and local strategic planning policies as it will deliver additional industrial floorspace and warehouse typologies to support the growth of the freight and logistics industry in Western Sydney. The site's proximity to the WSEA and the Western Sydney Aerotropolis connects the site to significant strategic areas.

3. PROJECT DESCRIPTION

The following section of the EIS summarises the key numeric components of the proposed development and describe the demolition, site preparation, construction and operational phases in further detail.

3.1. PROJECT OVERVIEW

The key components of the proposed development are summarised in **Section 6**. A copy of the architectural concept drawings is provided as **Appendix J**.

Table 9 Project Summary

Project Element	Summary
Project Summary	The proposed development seeks approval for the construction and operation of a new warehouse, to be used as a 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 floor area of 48,157sqm; broken down as follows: - Warehouse area: 46,314sqm - Office Area: 1,843sqm - 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 10,134sqm (10%).
Site/Project Area	Site area: 104,959 sqm Total Building footprint: 44,593 sqm
Proposed uses	Warehouse land uses with ancillary offices.
Demolition/Earthworks	No demolition or earthworks required. Site preparation is approved under a separate local development application. The Bulk Earthworks application for the site has been approved.
Gross Floor Area (GFA)	A total floor area of 48,157sqm; broken down as follows: - Warehouse area: 46,314sqm - Office Area: 1,843sqm
Floor Space Ratio (FSR)	0.46:1
Warehouses	One new warehouse is proposed to be constructed with ancillary offices and a high-bay component.
Maximum height	The maximum building height is 39m which attributes to the high bay component of the warehouse. The rest of the warehouse is predominantly 14.7m
Setbacks	North: 5m building (3m landscape) East: 15m building (7.5m landscape) South: 5m building (3m landscape) West: 10m building (5m landscape)
Vehicular Access	Four new accessways are proposed off the AIBP internal estate road. This includes two new light vehicle driveways into the designated car park, and two truck driveways with separate entry and exit to the hardstand area.
Parking	- A total of 329 vehicle parking spaces is proposed including: 246 car parking 64 HRV parking 19 B-Double parking

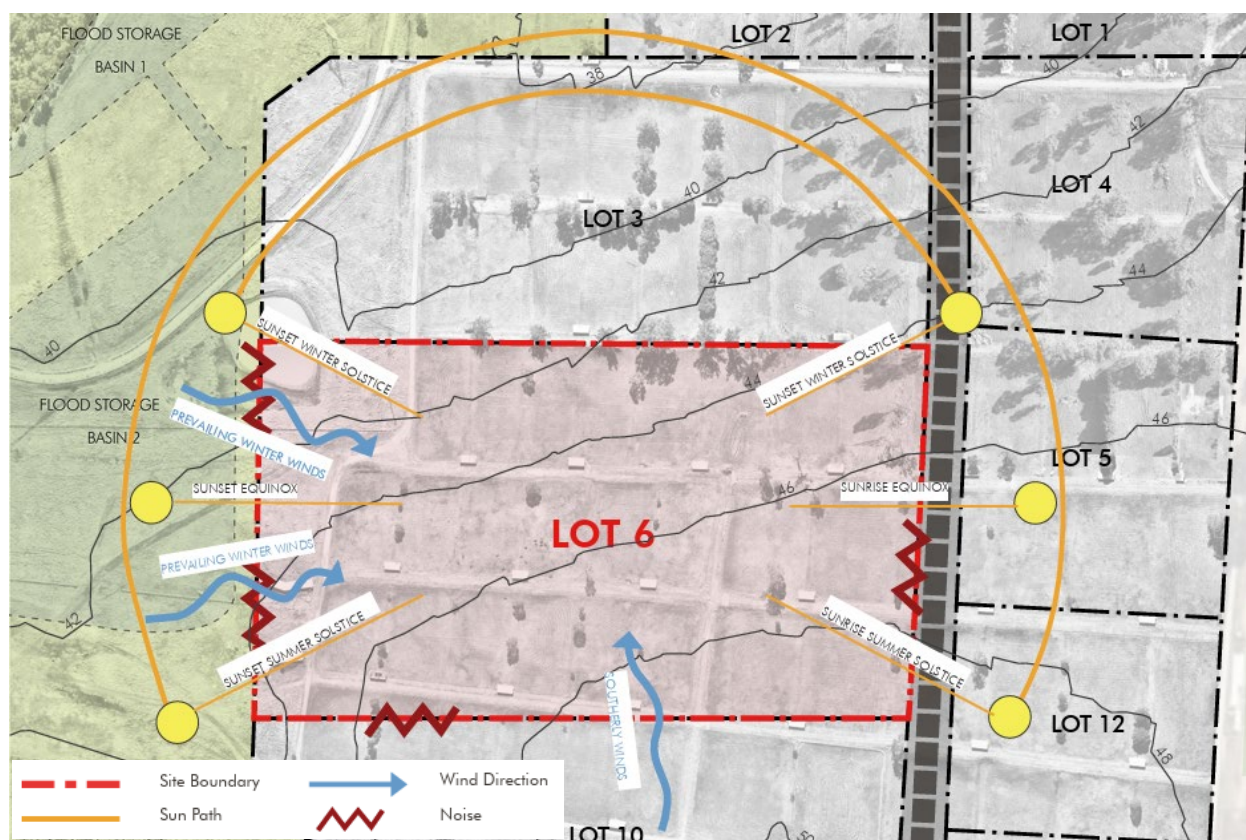
Project Element	Summary
	46 Bicycle parking spaces. 30 motorcycle parking spaces.
Landscape Area	10,134m ² (10%)
Hours of Operation	24 hours, 7 days a week.
Jobs	429 Operational Jobs
Estimated Development Cost	\$171,807,325 (Excl GST)

3.2. PROJECT AREA

A detailed analysis of the existing site conditions was undertaken to understand the extent of the site capable of being developed (**Figure 9**). The project area was determined based on a careful site analysis, with several constraints and opportunities to be considered into the project design as follows:

- Site topography.
- Solar and wind conditions.
- Key views.
- Environmental features such as the adjoining ENZ zoned land to the west.
- Surrounding development.

Figure 9 Site Analysis



Source: Nettleton Tribe

3.3. DESIGN RESPONSE

The proposed development is driven by a considered architectural design, underpinned by the AIBP vision to create a world-class warehouse and logistics precinct. The AIBP conveys a consistent theme of showcasing Alspec products throughout the estate.

The architectural vision includes simple, rational, and well-proportioned buildings, accentuated by high-quality elements, particularly at entry points, office areas, and street facades. The scale and built form responds to market trends and aligns with the aspirations of nearby precincts including the Western Sydney Employment Area and the Western Sydney Aerotropolis. The overall design seeks to set a benchmark for warehousing developments by balancing function and design.

3.4. SITE PREPARATION ACTIVITIES

3.4.1. Excavation/Cut and Fill

Earthworks and lot pad design is approved under a separate DA (DA24/0294) (refer Section 1.3). Accordingly, most site preparation works can be assumed to have been completed and not required as part of this application.

3.5. SITE LAYOUT

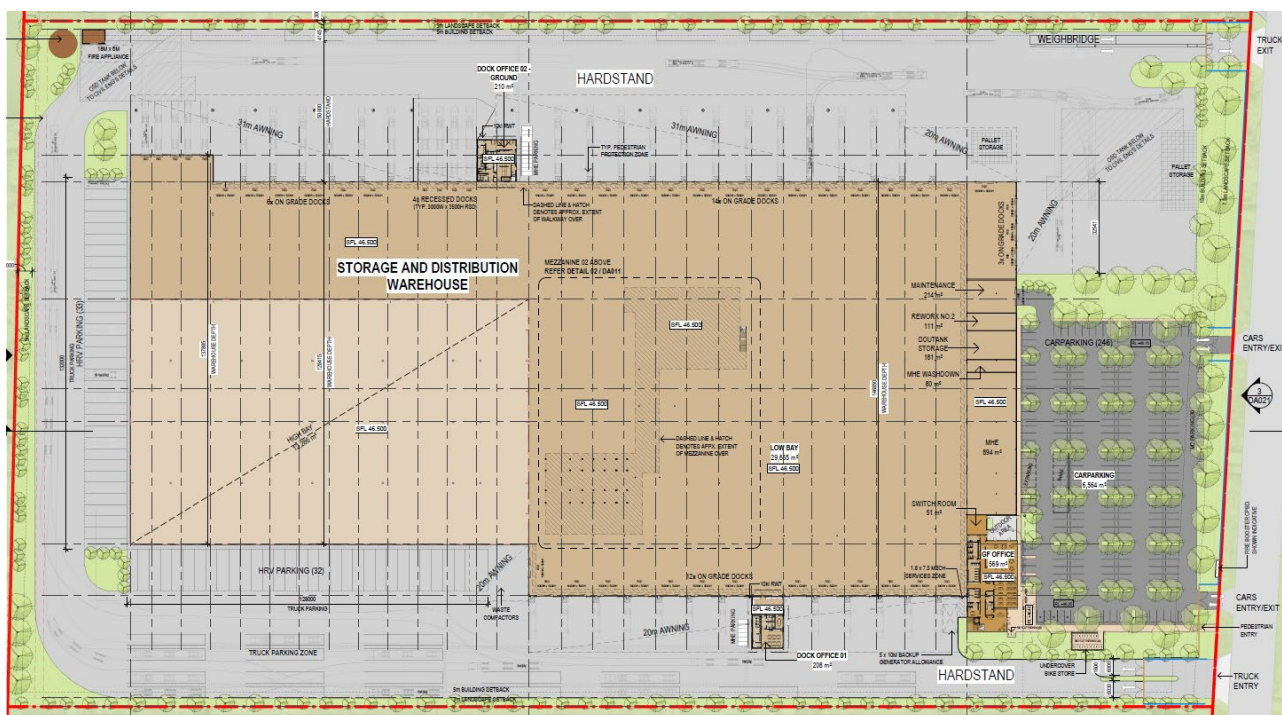
The physical layout of the site responds to the analysis of constraints and local design controls. The site layout takes advantage of the identified opportunities by proposing a warehouse orientated in an east-west configuration central to the property. The site layout ensures the building orientation prioritises a high quality, corporate street frontage appearance. As such, hardstand and loading areas are positioned away from the street and towards the side and rear, with entrances, offices and parking within prominent locations.

The following key design directions were identified to underpin the development:

- Address street setbacks and uphold a clean, corporate primary street frontage.
- Vehicular and pedestrian access from the AIBP internal estate road.
- Landscaping concentrated around human-centric areas like offices, entrances, setbacks and carpark.
- Views to the street and ENZ zoned land.
- Positioning high-bay component of the built form to the rear of the site to minimise perceived bulk and scale.

Architectural Plans have been prepared by Nettleton Tribe at **Appendix J. Figure 10** contains the Proposed Site Plan.

Figure 10 Proposed Site Plan



Source: Nettleton Tribe

3.6. BUILDING DESIGN

3.6.1. Proposed Land Uses

The detailed design of the proposed storage and distribution warehouse is described as follows:

- A total Warehouse GFA of 44,658m² split across a ground floor and a mezzanine level. This component supports a high-bay area located at the south west corner of the building. The warehouse area supports 36 covered loading docks along the northern and southern sides of the building. A detailed GFA breakdown is provided below:
 - Total Warehouse GFA 44,658m²
 - Ground floor: 41,950m²
 - Low bay area: 30,283m²
 - High bay area: 14,375m²
 - Mezzanine: 2,708m²
 - Area 1: 2,385m²
 - Area 2: 323m²
- A total Office GFA of 1,843m² split between the two-storey main office located at the south-east corner of the building, and two separate dock offices adjoining the loading areas. A detailed GFA breakdown is provided below:
 - Total Office GFA 1,843m²
 - Dock Office 1: 208m²
 - Dock Office 2: 420m² (2 storeys)
 - Main Office 1,215m² (2 storeys)

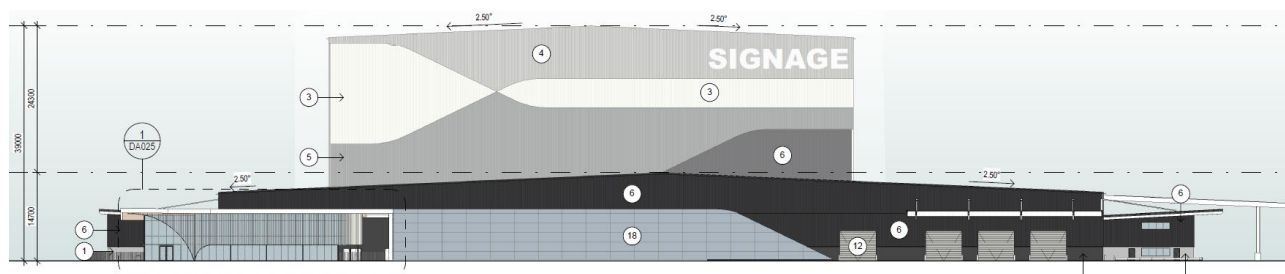
3.6.2. Design Details

The proposed development seeks to create a single storey warehouse with a high-bay component towards the rear (western side) of the site. The orientation of the building permits loading areas to be located facing the sides of the property, along the longest lengths of the warehouse. This supports 32 on-grade docks and 4 recessed docks.

The office is located at the south east corner of the building, and comprises a two-storey configuration with a ground floor main site entry and adjoining outdoor area. This building design ensures the offices address the street frontage to enhance legibility of building entrances as well as add visual interest to the street facing facade with a corporate, high quality appearance. The office component protrudes from the main massing form with a cantilever roof feature. This cantilever roof design employs a geometric design to create an artistic feature to enhance the built form aesthetic. Together, the office design creates a welcoming, modern entrance for visitors and workers, complemented by landscape features at the ground level.

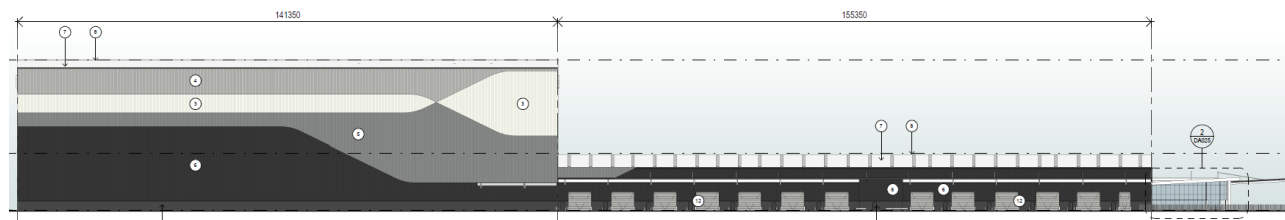
The warehouse built form accommodates two different heights comprising of a high bay component with a ridge height of 39m and a low bay component with a ridge height of 14.7m which is the predominant building height. These two heights cater to differing functions required by warehouse operations and therefore unlock flexibility and adaptability for future tenants. The following figure illustrates the warehouse elevations.

Figure 11 Warehouse Elevations



Picture 5 East Elevation

Source: Nettleton Tribe



Picture 6 South Elevation

Source: Nettleton Tribe

The proposed building façade considers articulation and design features to enhance visual appearance. To reduce the perceived height and bulk of the warehouse and high-bay component, materials and patterning have been introduced to break up its mass and vertical scale. This articulation also creates visual interest and avoids the creation of large, blank warehouse walls. The use of high-quality elements, particularly at entry points, office areas, and street facades draws attention to key components for workers and visitors to engage with.

This proposal also upholds the consistent theme of showcasing Alspeck products throughout the estate. This is illustrated in the following architecturally prepared building perspectives.

Figure 12 Proposed Building Perspectives



Picture 7 View of Warehouse and Offices

Source: Nettleton Tribe



Picture 8 View of Offices and Building Entry

Source: Nettleton Tribe

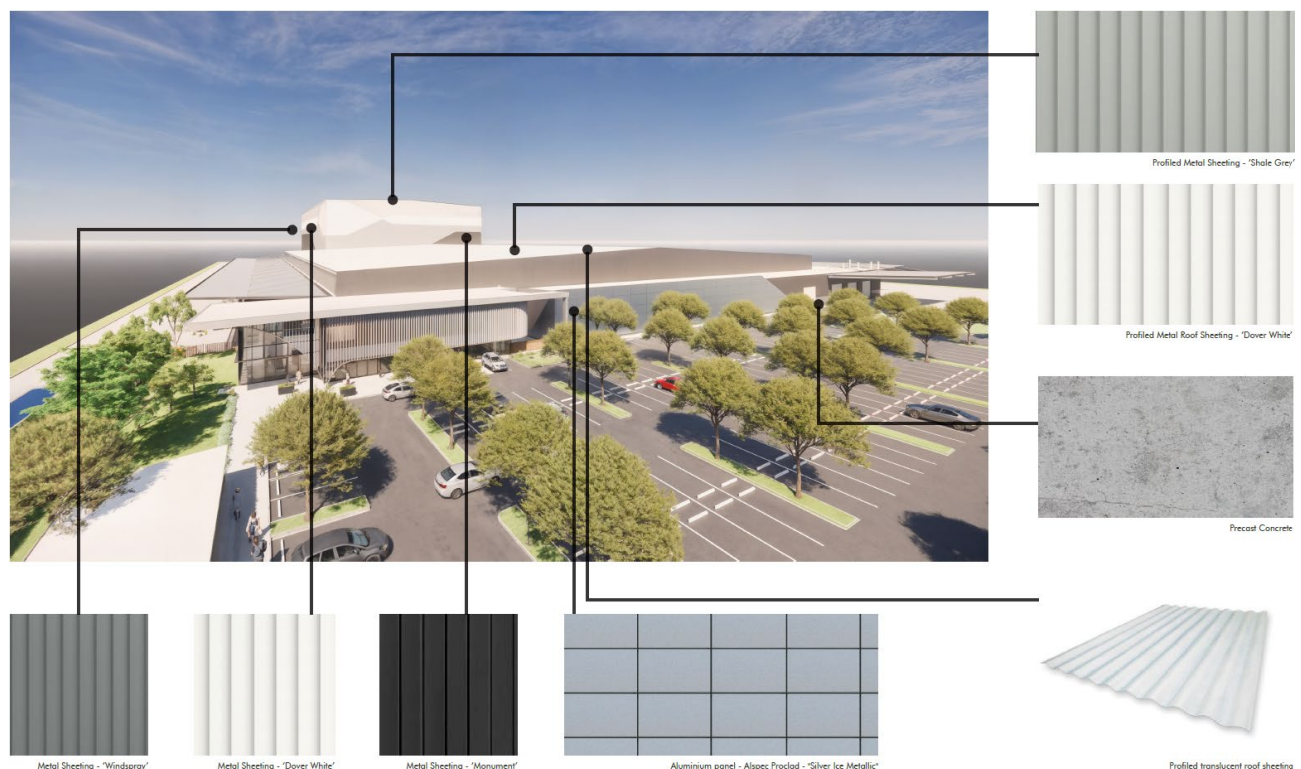
3.6.3. Materials and Finishes

The colour and material palette strategically focuses on the street frontage and significant viewpoints, which employs high-quality materials. The integration of Alspec products is celebrated through elements such as extruded aluminium focal points, the infusion of colour and visual contrast along prominent facades, and the use of premium pre-finished panels in selected key locations on warehouse facades.

The selection of colours, materials, and finishes are thoughtfully selected, ensuring a cohesive aesthetic throughout the AIBP estate. External walls are characterised by simple tones accentuated with feature materials, contributing to the overall landscaped backdrop, and enhancing the streetscape. Light coloured grey metal sheeting, aluminium panels, and precast concrete materials are used for the warehouse façade and roof. Timber soffits are employed for the eaves of the office roof to add visual interest through a complementary material finish.

Figure 13 illustrates the Proposed Materiality for the warehouse with references.

Figure 13 Proposed Materiality



Picture 9 Warehouse Component

Source: *Nettleton Tribe*



Picture 10 Ancillary office

Source: Nettleton Tribe

3.6.4. Sustainability

Sustainability is an important outcome driving the design of the proposed development. Strong environmental commitments are made, through the implementation of effective sustainable measures within the built form and function. Practical strategies relating to shading, ventilation, power generation and water have been applied to achieve a positive and sustainable project outcome. This commitment aligns with the broader AIBP sustainability objectives.

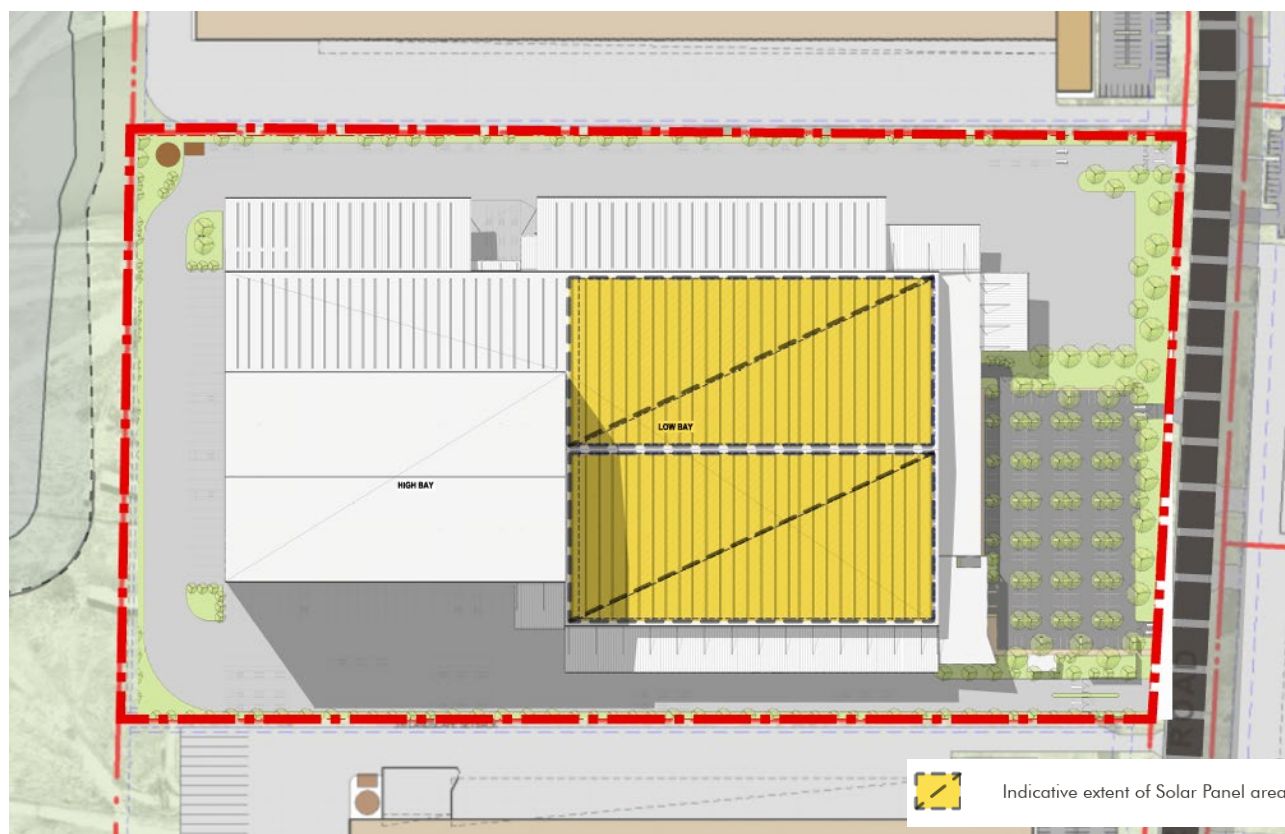
The proposed development meets and exceeds sustainability requirements set for non-residential developments. This is through the application of sustainability initiatives including:

- Space efficient building layout.
- A commitment to energy efficiency exceeding the requirements of Section J of the Building Code of Australia.
- A highly efficient façade wall-glazing system designed to minimise heat gains into the building while promoting the entry of daylight for the areas occupied during the day.
- Reduction of potable water use.
- The use of high WELS rated sanitary fixtures and fittings.
- Rainwater collection and reuse.
- Increased use of daylighting to reduce power usage.
- A solar array to contribute to renewable energy supply and reduce reliance on the grid.
- Waste Minimisation strategies.
- Water Sensitive Urban Design principles.
- Electric vehicle charging infrastructure.

Further details regarding the sustainable design practices proposed by the development is outlined within the Sustainability Report prepared by Northrop.

Nettleton Tribe have prepared a Solar Opportunity Diagram to outline how the building design has considered maximising the efficiency of the area it resides. Solar panels will cover the 3 northern roofs of the development, in order to be exposed to the most direct sunlight as possible, and therefore maximise the energy generated. The entire roof structure has the capability to take solar panels.

Figure 14 Solar Opportunity Diagram



Source: Nettleton Tribe

3.7. LANDSCAPING

The landscape strategy considers enhancing the public domain and human-centric areas to create green, elevated outdoor spaces. An improved landscape outcome will be achieved through the planting of 212 trees of indigenous and native species which will create new habitats for wildlife and active, living environments. The selection of tree and vegetation planting will establish ecological and visual connections with the broader AIBP developments and streetscape. Additionally, the vegetation on the west of the site will strengthen ecological links to Flood Storage Basin 2 and the Outer Sydney Orbital Corridor.

Considerable planting including large trees and dense evergreen species from local plant communities are incorporated along the site boundaries. The landscaped setbacks are designed to better filter views to the development and integrate it into the landscape. This is enhanced by additional canopy cover, which helps mitigate climate change and improve the quality of life. A total of 6,940 sqm of canopy cover is proposed which will create a lush visual appearance and habitat for on-site workers and wildlife. They are planted in accordance with DCP and bushfire requirements. **Figure 15** includes a landscape section of the street frontage and proposed landscape setback.

Overall, the landscape design fosters a connection to nature and supports the health of the local plant community. This reflects the developments commitment to sustainable, vibrant, and inclusive outdoor spaces that enhance the quality of life for all users.

Figure 15 Landscape Section - Street Frontage



Source: Geoscapes

The proposed carpark will support 40% of the proposed tree canopy cover. Trees have been strategically positioned within planting blisters, with an extended layer of Amsterdam tree soil, to maximise canopy cover and shade. Short hedges and groundcover planting supplements the trees to create diverse landscape features within the carpark. The design carefully considers underground utilities and security requirements, as well as DCP requirements. The carpark landscape treatment combined with the proposed landscape at the pedestrian entry and street frontage helps screen the development while improving the visual experience of the streetscape.

In addition, the office entry and outdoor area includes landscaping designed to enhance the visual quality of the space, promoting social interaction and supporting the physical and emotional well-being of employees.

3.8. STORMWATER MANAGEMENT

3.8.1. Drainage

The site itself is split into two sub-catchments with the eastern half of the site proposed to connect to the stormwater in the AIBP Collector Road, and the western half of the site proposed to connect into a stormwater easement that drains through the COPE site to the north. Prior to works commencing, the site will be prepared to the bulk earthworks levels and the delivery of gross pollutant traps and bio-retention basins will occur as part of the subdivision design under DA24/0294 and in accordance with Council's water quality requirements.

3.9. TRANSPORT AND PARKING

3.9.1. Access and Circulation

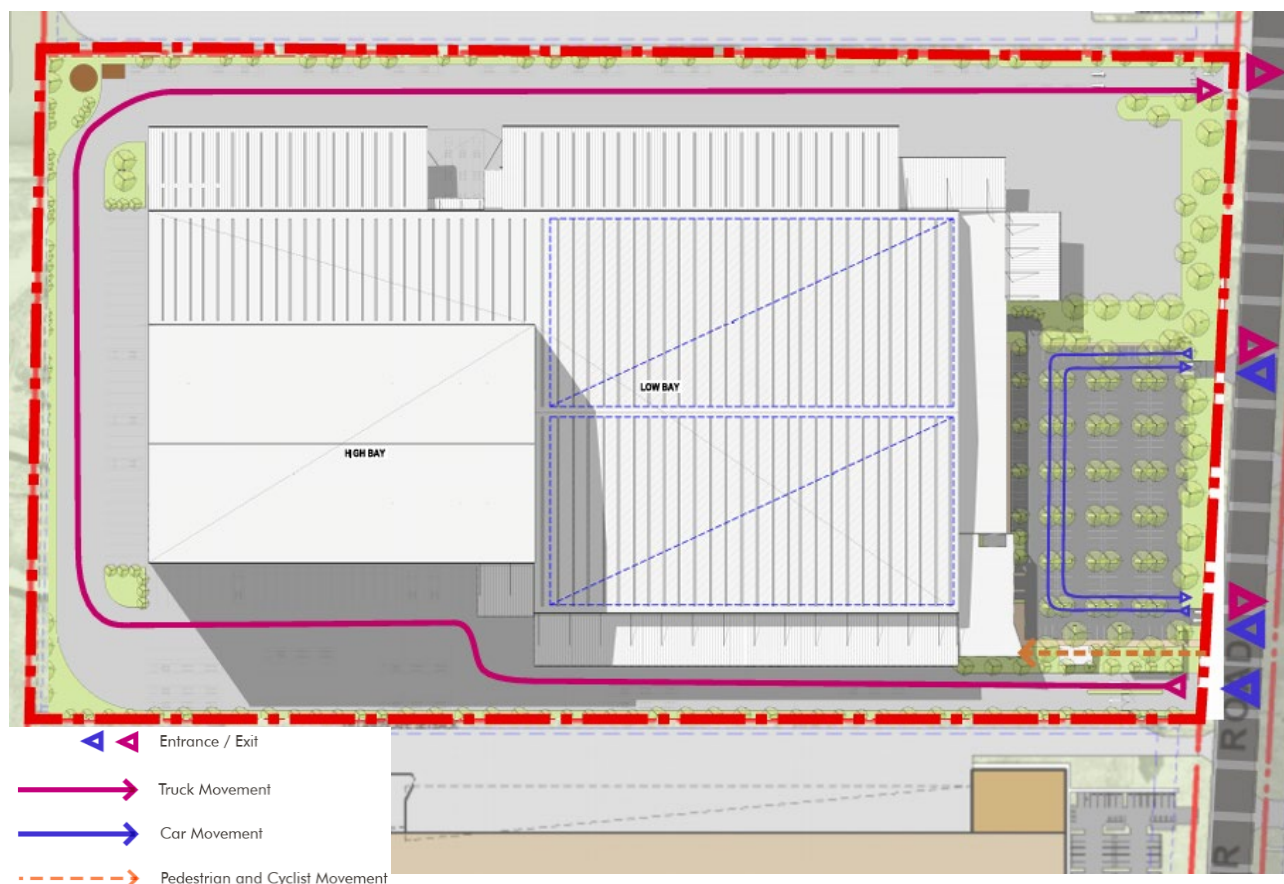
The site supports a legible and safe site access and internal configuration. It aligns with the functions and activity of warehouse operations to ensure heavy vehicles and light vehicles circulate safely and without conflict with pedestrian movements.

Vehicular site access is proposed along the eastern street frontage via four vehicle access points, connecting to the AIBP's internal estate road. **Figure 16** identifies the four access points, which are distinguished by two light vehicle driveways for entry and exit into the carpark, and two heavy vehicle driveways for separate entry and exit. The separate entry and exit for heavy vehicles ensures all movement occurs in one direction and all trucks will circulate in a clockwise direction around the warehouse along the hardstand. All docks have been designed for right hand down movements. This design will reduce the risk of congestion for heavy vehicles manoeuvring through the site during operations.

Pedestrian access is provided at the same frontage, towards the southern end of the boundary between the heavy vehicle and light vehicle accessways. It provides direct and clear access to the office entry and

connects to the broader pedestrian network provided within the AIBP estate road. Within the site, pedestrian pathways have been clearly identified within the warehouse. Delineation of pathways for pedestrians across the hardstand have been provided from the heavy vehicle parking areas to access the two dock offices at the northern and southern sections of the hardstand.

Figure 16 Traffic Movement



Source: Nettleton Tribe

3.9.2. Parking

The provided car parking meets the anticipated demands generated by the proposed warehouse and ancillary offices. 246 private vehicle parking spaces is provided within the car park at the eastern side of the warehouse. This provision meets the minimum parking requirement of 194 car spaces as outlined within the DCP. The car park is located adjacent to the office entry to permit clear wayfinding for visitors and workers. The design of the parking area complies with the relevant requirements.

In addition, the hardstand accommodates 64 heavy rigid vehicle (HRV) and 19 B-double parking spaces.

3.10. WASTE MANAGEMENT

3.10.1. Waste Storage

Waste management for the proposed warehouse will be appropriately stored, handled and collected from the site. A waste storage area is proposed along the hardstand and designed in accordance with Council's requirements. It is a waste compactor area located in an area not visible from the street and screened by development.

3.10.2. Waste Servicing

A suitably licensed and qualified private waste contractor will be engaged to collect waste generated during the standard operations of the site. Waste vehicles will enter the site via the heavy vehicle truck entry and travel to the waste storage area. The waste compactor zone will then be to the right, at the southern section of the hardstand. The waste collection vehicle will have adequate space to be able to perform in and out

turning movements at waste area for collection. To exit, waste vehicles must continue travelling clockwise around the hardstand to reach the truck exit driveway near the northern boundary of the site. Waste vehicles will be placed back onto the Internal Access Road, allowing them to depart from the wider industrial business park. All waste collection activities would occur fully within the confines of the site, in the designated area.

3.11. OPERATIONAL DETAILS

3.11.1. Warehouse Activities

The proposed Storage and Distribution Warehouse incorporates a high-bay component which is a highly compatible and in demand warehousing typology to support logistics industries. The Storage and Distribution Warehouse primarily supports the logistics of retail beverage goods, handling large volumes of product movement through automated systems. Its operations are structured around the following workflows: inbound product receipt, pallet distribution, delayering for smaller shipments, and empty keg handling. Each workflow leverages automation and guided conveyor transport systems to streamline the flow of goods.

The inbound operations occur at the northeastern dock, where bulk beverage products arrive from the manufacturing facility. The palletised goods are unloaded either via skate docks, manual forklifts, or containers are unloaded and emptied on site. Once received, the pallets enter the facility's conveyor guided circulation system, which transports them to either the ASRS (Automated Storage and Retrieval System) racking within a high-bay storage area or transferred directly to outbound distribution points.

For outbound pallet distribution, the process involves the transfer of pallets from ASRS storage to staging lanes near the northeast dock via conveyor systems.

For wholesale and smaller format deliveries, a delayering operation is conducted beneath the mezzanine area, where pallets are unwrapped and separated into smaller units. These smaller loads are then transported by Automated Guided Vehicles (AGVs) to staging areas at the southeastern dock, where outbound vans are loaded via forklifts for delivery to various wholesale partners.

The warehouse also manages the return and redistribution of empty kegs. These are received at the northeast dock and moved to dedicated storage areas via AGVs. When required, kegs are picked and transported to the southeast dock for outbound shipment using AGVs or robotic systems.

3.11.2. Storage Details & Hazardous Goods

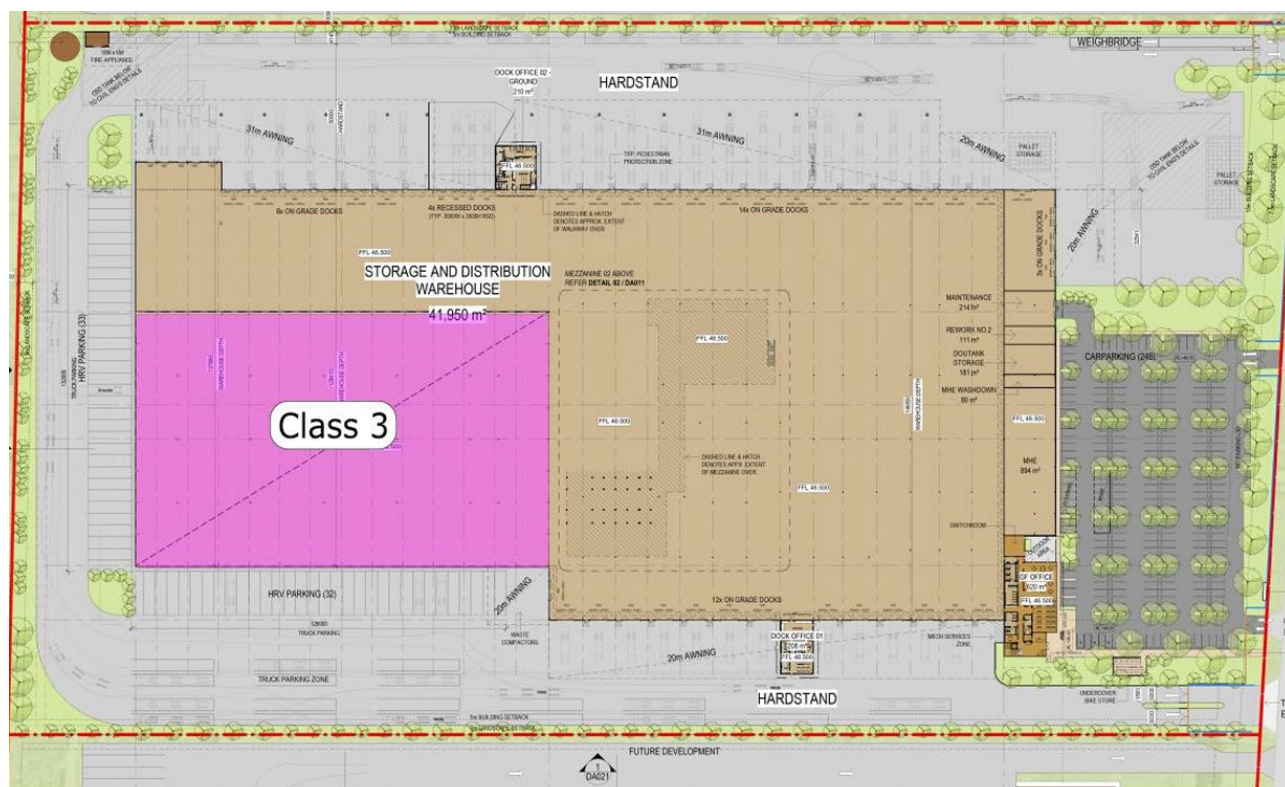
The proposed warehouse is to function as a storage and distribution facility. Beverage products are the primary good to be stored and handled within the warehouse. As such, these products were reviewed for their potential classification as Dangerous Goods (DGs). The only Dangerous Goods proposed for storage are alcoholic beverages with an alcohol content between 24% and 70%. Under the Australian Code for the Transport of Dangerous Goods by Road & Rail 7.9 (Ref. [2]), these are classified as Class 3 packing group (PG) III Dangerous Goods.

The following table details the classes and quantities of DGs proposed to be stored and handled at the site. **Figure 17** also illustrates the potential location for the storage of DGs.

Table 10 Classes and Quantities of Dangerous Goods

Class	Description	PG	Quantity (kg)
3	Flammable liquids	III	51,800

Figure 17 Locations of Dangerous Goods



Source: Nettleton Tribe

3.12. UTILITIES AND SERVICES

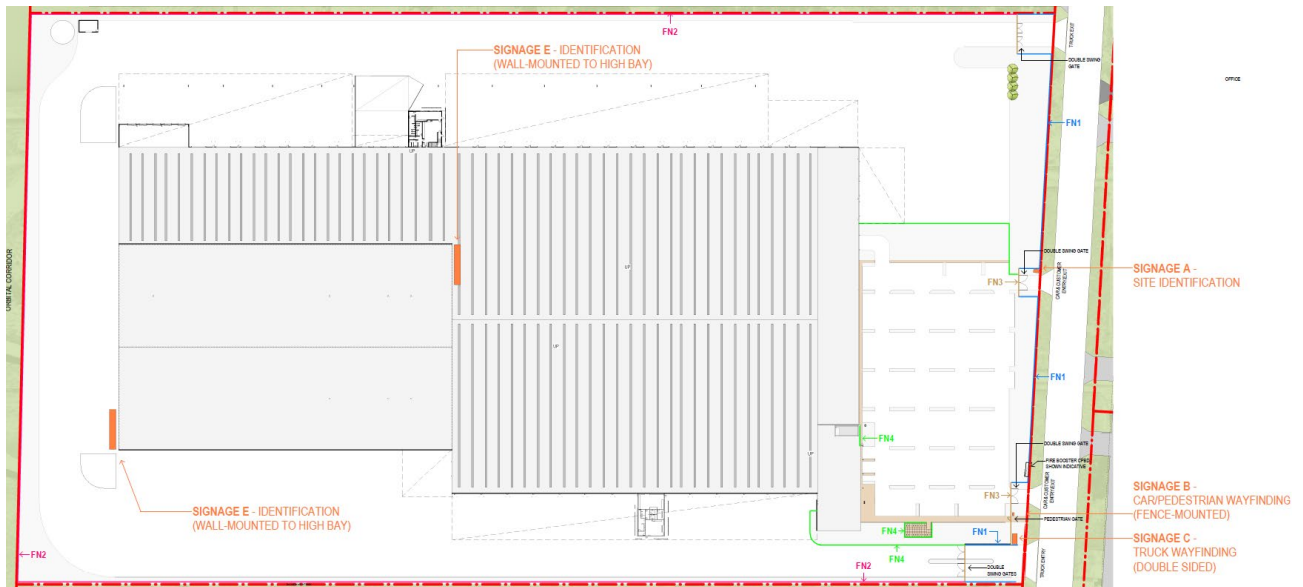
The proposed development will be supported by utilities and infrastructure as approved under the Bulk Earthworks DA. It demonstrates the existing network capacity to support the AIBP as well as identify any augmentation and servicing options to support future development. As the proposed storage and distribution warehouse has been considered in this assessment, this application does not propose any further utility infrastructure.

3.13. SIGNAGE

Signage is proposed across the site to provide site identification and wayfinding for visitors and workers. Four types of signs are proposed to primarily address the eastern and western interfaces. **Figure 18** details the proposed signage location and details. It conveys:

- A site identification sign is proposed along the eastern boundary at the centrally located car entry and exit. It will be a 4m tall sign detailing the tenant identification using the AIBP materiality and logo.
- A fence mounted sign for car and pedestrian wayfinding along the eastern boundary. It will be a 2.1m sign with office details and directions using the AIBP materiality and logo.
- A truck wayfinding sign is positioned at the south eastern truck entry. It is 2m tall and double-sided to provide directions for trucks accessing the site.
- Two wall mounted identification signs are proposed on the eastern and western warehouse high bay façades. They will be a maximum 7.7m by 2.7m large to provide tenant identification.

Figure 18 Signage Plan



Picture 11 Signage Location

Source: Nettleton Tribe



Picture 12 Signage Details

Source: Nettleton Tribe

3.14. DEVELOPMENT TIMING

The proposed Storage and Distribution Warehouse will be constructed in one stage. It is important to note the site preparation and bulk earthworks have been approved under DA24/0294 which will complete the lot

pad design for all the lots within the AIBP. As such, the site preparation will be undertaken as part of a separate local DA, and the construction of the warehouse under this SSDA at a following stage.

4. 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*

It identifies the key statutory matters which are addressed in detail within the EIS, including the power to grant consent, permissibility, other approvals, pre-conditions and mandatory considerations.

4.1. STATUTORY REQUIREMENTS

The following sections provide a summary of the relevant statutory requirements having regard to the *State Significant Development Guidelines*. A detailed statutory compliance table for the project is provided at **Appendix C**.

4.1.1. Power to Grant Approval

The legal pathway under which the consent is sought, why this pathway applies, and the relevant consent authority is outlined in **Table 11**.

Table 11 Power to Grant Approval

Matter	Consideration
Declaration of SSD	In accordance with Schedule 1 of the <i>State Environmental Planning Policy (Planning Systems) 2021</i> (Planning Systems SEPP), development that has an EDC of more than \$50 million for the purpose of Warehouse or Distribution Centre are classified as SSD: 12 Warehouses or distribution centres (1) <i>Development that has an estimated development cost of more than the relevant amount for the purpose of warehouses or distribution centres (including container storage facilities) at one location and related to the same operation.</i> (3) <i>In this section—</i> relevant amount means— (b) <i>for any other development—\$50 million.</i> The proposed works have an estimated EDC of \$171,807,325 (Excl GST) (refer Appendix S) and accordingly, the proposal is SSD for the purposes of the Planning Systems SEPP.

Matter	Consideration
Consent Authority	Under section 4.5 of the EP&A Act the Minister for Planning is the Consent Authority for State Significant Development.

4.1.2. Permissibility

The permissibility of proposed development is outlined in **Table 12**.

Table 12 Permissibility

Matter	Consideration
Land use(s)	The proposed development constitutes a 'Warehouse or Distribution Centre' which is defined as the following: <i>a building or place used mainly or exclusively for storing or handling items (whether goods or materials) pending their sale, but from which no retail sales are made, but does not include local distribution premises.</i>
Land use zone(s)	The site is zoned E4 General Industrial in accordance with the PLEP 2010.
Permissibility	Accordingly, the proposed warehouse operations is permitted with consent in the E4 Zone.

4.1.3. Other Approvals

The other approvals required to carry out the project are outlined in **Table 13** below.

Table 13 Other Approvals

Matter	Consideration
Consistent approvals s4.42 of the EP&A Act 1979	Act
	Applies (Y/N)
	Fisheries Management Act 1994 (s144) N
	Coal Mine Subsidence Compensation Act 2017 (s22) N
	Mining Act 1992 (380A) N
	Petroleum (Onshore) Act 1991 (s24A) N
	Protection of the Environment Operations Act 1997 (s43) N
	Roads Act 1993 (s138) N
EPBC Act	Pipelines Act 1967 N
	The Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act) protects and manage nationally and internationally important flora, fauna, ecological communities, and heritage places. Bilateral Agreement 18 allows for the streamlining of environmental assessments and approvals between the Australian Government and the states and territories, ensuring both levels of government work together to protect Australia's unique environment while reducing duplication in the approval process.
Other Approvals	No other approvals are required.
Approvals etc. that do not apply	Fisheries Management Act 1994 - -permit under s201,205 or 219
	Heritage Act 1977 – approval under part 4 or excavation permit under s139
	National Parks and Wildlife Act 1974 – an Aboriginal Heritage Impact Permit, s90

Matter	Consideration
	Rural Fires Act 1997 – a bush fire safety authority under s100B
	Water Management Act 2000 – a water use approval s89, water management work approval s90 or activity approval (other than an aquifer interference approval) s91.

4.2. PRE-CONDITIONS TO GRANTING CONSENT

Table 14 outlines the pre-conditions to exercising the power to grant approval which are relevant to the project and the section where these matters are addressed within the EIS.

Table 14 Pre-Conditions

Statutory Reference	Pre-Condition	Section in EIS
Resilience and Hazards SEPP – clause 4.6(1)	Under the SEPP 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. 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.	Section 6.12.4
Biodiversity and Conservation SEPP	Part 13.5 of the Biodiversity Conservation SEPP provides development controls for Certified - Urban Capable Land under the CPCP. Development consent must not be granted to development on Certified - Urban Capable Land unless the consent authority has considered whether the development is consistent with the CPCP Mitigation Measures Guideline (DPE 2022). The proposed development will implement all the required mitigation measures to ensure compliance with the CPCP bio certification.	Section 6.6
Section 66 EP&A Regulations – Contributions 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. There is a Voluntary Planning Agreement which has been executed with Council and is registered on title. The proposed works are identified in the Voluntary Planning Agreement, and are required to be completed by the 1st January 2026.	Section 2.3
SEPP (Transport and Infrastructure) 2021	Clause 2.122 relates to traffic generating development and requires that before granting consent the consent authority must refer certain development for with access to any road to Transport for NSW. The proposed warehouse is considered to be traffic generating development and will be referred.	N/A

4.3. MANDATORY CONSIDERATIONS

Table 15 outlines the relevant mandatory considerations to exercising the power to grant approval and the section where these matters are addressed within the EIS

Table 15 Mandatory Consideration

Statutory Reference	Mandatory Consideration	Section in EIS
Consideration under the EP&A Act and Regulations		
Section 1.3	The relevant objects will be addressed within the EIS.	Throughout EIS
Section 4.15 (1)(a)(i) Relevant environmental planning instrument	All relevant EPIs will be addressed in the EIS, these include; - Resilience and Hazards SEPP - Planning Systems SEPP - Transport and Infrastructure SEPP - Sustainable Buildings SEPP - Industry and Employment SEPP	Appendix C
Section 4.15 (1)(a)(ii) Relevant draft environmental planning instrument	Not applicable as no draft instruments apply.	N/A
Section 4.15 (1)(a)(iii) Relevant development control plan	Relevant plans include Penrith Development Control Plan 2014	Appendix D
Section 4.15 (1)(a)(iiia) any planning agreement or draft planning agreement	Voluntary Planning Agreement for the site entered into between the applicant and Penrith City Council.	Section 2.3
Section 4.15 (1)(a)(iv) relevant matters prescribed by the Regulations.	Clause 66 Contributions for certain areas of Sydney does not apply. Notwithstanding, 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. There is a Voluntary Planning Agreement which has been executed with Council and is registered on title. The proposed works are identified in the Voluntary Planning Agreement, and are required to be completed by the 1st January 2026.	Section 2.3
Section 4.15(1)(b) the likely impacts of that development,	The likely impacts of the development including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,	Section 6
Section 4.15(1)(c)	The suitability of the site for the development	Section 7
Section 4.15(1)(d)	Any submissions made in accordance with the Act or regulations	N/A
Section 4.15(1)(2)	The Public Interest	Section 7
Mandatory relevant considerations under EPIs		
State Environmental Planning Policy (Resilience and Hazards) 2021	Section 4.6 – Hazardous and offensive development. A Preliminary Risk Screening has been prepared to indicate the quantities of dangerous goods and hazardous materials. The assessment confirms the development is not potentially hazardous on the basis of the quantity and location of Dangerous Goods stored.	Section 6.12.3
State Environmental Planning Policy (Transport and Infrastructure) 2021	Section 2.122 – Traffic-generating development.	N/A
State Environmental Planning Policy (Biodiversity and Conservation) 2021	Chapter 2 – Vegetation in non-rural areas will be considered within the SSDA.	N/A

Statutory Reference	Mandatory Consideration	Section in EIS
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.	Section 3.13
State Environmental Planning Policy (Sustainable Buildings) 2022 (SB SEPP)	The Sustainable Buildings SEPP guides the design and construction of new development to be more sustainable and meet sustainable performance targets. - Chapter 3 Standards for non-residential development. - Schedule 3 Standards for energy and water use for large commercial development.	Section 6.12.1 and Appendix C
Considerations under other legislation		
Biodiversity Conservation Act 2016 Part 7 and Part 8 (2) (BC Act)	The likely impact of the proposed development on biodiversity values as assessed in the biodiversity development assessment report. The Minister for Planning may (but is not required to) further consider under that Act the likely impact of the proposed development on biodiversity values The site is certified under the Cumberland Plain Conservation Plan. Section 7.6 states that Part 7 of the BC Act does not apply to development on biodiversity certified land under Part 8. Part 8.4 (2) of the BC Act states the following in relation to Development (including State significant development) under Part 4 of the Planning Act: <i>An assessment of the likely impact on biodiversity of development on biodiversity certified land is not required for the purposes of Part 4 of the Environmental Planning and Assessment Act 1979.</i> Further 8.4(3) states that: <i>A consent authority, when determining a development application in relation to development on biodiversity certified land under Part 4 of the Environmental Planning and Assessment Act 1979, is not required to take into consideration the likely impact on biodiversity of the development carried out on that land.</i>	Appendix M
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 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). It is no longer a requirement for the AIBP development to assess commonwealth biodiversity impacts within certified urban capable land, provided it is compliant with the CPCP. The BMP Letter prepared by Ecoplaning outlines the CPCP mitigation measures that will be implemented by the proposed development.	Section 6.6
Water Management Act 2000	The proposed development does not require a Controlled Activity Approval or Vegetation Management Plan (VMP).	N/A
Rural Fires Act 1997	Planning for Bushfire Protection (NSW Rural Fire Service 2018) has been considered in the design and assessment provided within the EIS.	Section 6.12.9

Development Control Plan

Statutory Reference	Mandatory Consideration	Section in EIS
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: <i>E18 Luddenham Road Industrial Business Park</i>	Appendix D

5. COMMUNITY ENGAGEMENT

The following sections of the report describe the engagement activities that have been undertaken during the preparation of the EIS and the community engagement which will be carried out if the project is approved.

5.1. ENGAGEMENT CARRIED OUT

Community and stakeholder engagement has been undertaken by the Project Team in the preparation of the SSDA. Consultation was also undertaken with the certain stakeholders to inform the detailed assessment of key matters. The engagement carried out for the project is outlined in **Table 16**.

Table 16 Engagement Carried Out

Stakeholder	Action	Date(s)
Community Stakeholders		
Surrounding landowners	Near neighbours of the site were consulted through: ▪ Distribution of a project newsletter on 8 April 2025. ▪ A doorknock on 10 April 2025. ▪ Enquiry management for the duration of the consultation period Key feedback received from the surrounding landowners include: ▪ The issue of changing local character. ▪ Questions regarding consultation and engagement. ▪ Concerns of traffic impacts. ▪ A question regarding where stormwater runoff will be collected.	8 April 2025 (Newsletter Distribution) 10 April 2025 (doorknock)
Key Agencies		
DPHI	Meeting to discuss key issues to be addressed within the EIS. Discussion carried out and the project response includes the following: ▪ Storage of alcohol - Urbis has reviewed the classification standards and has engaged with the NSW EPA and Fire & Rescue as appropriate. ▪ HB+B have prepared a preliminary hazard analysis, the findings of which have confirmed that an Environmental Protection License will not be required. ▪ Planning pathway - HB+B has been advised by its technical consultants that the quantum of alcohol is less than 2,000 tonnes. Project specific SEARs were therefore not required.	10 March 2025
Penrith City Council	Two meetings were completed with Penrith City Council at the commencement of the Project. Firstly, a Pre-DA meeting was completed with Council to introduce the project. In addition, a meeting with Council's strategic planners occurred to discuss the preparation of a site-specific Planning Proposal for an adjustment of the Height of Buildings Map to the PLEP.	10 April 2025 (Pre-DA Meeting) 9th April 2025 (Strategic Planning Team Meeting)
Transport for NSW	There have been multiple meetings with Sydney Metro over the last 12 months to provide information on the proposed upgrade to Patons Lane and Luddenham Road. There have also been updates on the trip generation rates for the wider business park. The Development Application for the upgrade to Patons Lane and Luddenham Road will soon be lodged with Penrith City Council. Sydney Metro's feedback has been incorporated into the final design.	14 April 2025 6 May 2025

Stakeholder	Action	Date(s)
Sydney Water	Henry and Hymas emailed Sydney Water to introduce the project and confirm whether advice provided at the subdivision stage of the AIBP remains relevant to this project. At the time of writing this report, no response has been received from Sydney Water. The team will continue to communicate with Sydney Water as required by the project.	22 April 2025
NSW Rural Fire Service	Peterson Bushfire emailed the NSW RFS to seek feedback on the Proposal. The NSW RFS advised that they have no objections to the Proposal, subject to compliance with the domestic and international standards set out in Section 5 of the Bushfire Assessment prepared by Peterson Bushfire.	15 May 2024
Fire and Rescue NSW	Riskcon emailed FRNSW to seek feedback on the R&H SEPP assessment. FRNSW advised that they do not consult with proponents at this stage and will provide comment via the Department of Planning Major Projects Portal.	6 May 2025
Endeavour Energy	HB+B Property emailed Endeavour Energy's Development team to provide summary information about the proposed warehouse and seek feedback. Endeavour Energy issued conditions and advice for the Proposal, including: ▪ Asset planning ▪ Underground activity ▪ Bush fire ▪ Driveways ▪ Earthing ▪ Flooding ▪ Hazardous Environment ▪ Modifications	6 May 2024
DCCEEW Environment Protection Authority (EPA)	EMM Consulting emailed the EPA to introduce the Proposal, advise that no major emission sources have been identified, and state that mitigation measures will be implemented. In addition, Arcadis emailed the EPA to seek feedback on the Waste Management Report, which has been submitted as part of the SSDA. At the time of writing this report, no response from the EPA has been received. Notwithstanding, HB+B Property will continue to keep the EPA informed as required by the Proposal.	22 April 2025 6 May 2025

This engagement outlined above was consistent with the community participation objectives in the Undertaking Engagement Guidelines for State Significant Projects and complied with the community engagement requirements in the SEARs as summarised below:

- A thorough, open, and transparent community consultation process must be executed, which includes detailing any potential impacts of the project.
- The process should include how feedback and issues raised during engagement activities have been considered and addressed in the project development.
- The strategy should outline the proposed approach to future community and stakeholder engagement, informed by the results of the initial consultation.

In accordance with the Regulations, the EIS will be placed on formal public exhibition once DPHI has reviewed the EIS and deemed it 'adequate' for this purpose. Following this exhibition period, the applicant will respond to any matters raised by notified parties.

5.2. COMMUNITY VIEWS

The key issues raised by the community and key stakeholders are summarised in the table below. A detailed community engagement table is provided as **Appendix T** which details the way in which these issues have been addressed in the EIS.

Table 17 Community Feedback

Key Issue	Feedback	Project Response
Strategic Context		
Changing Local Character	A few residents indicated this proposal may negatively impact the quiet, rural character and feel of the area, referencing the increased traffic along Luddenham Road as evidence for this.	The site has been rezoned by Council for industrial land uses, which permits warehousing developments. A detailed Visual Impact Assessment (VIA) has been prepared for this project. The VIA outlines a range of mitigation measures that HB+B Property will implement to minimise impact on neighbours. HB+B will continue to communicate with neighbours as required by the project.
Relevant Statutory Issues		
Land Zoning	One resident expressed their objection to the proposal, arguing that the land should be zoned for more housing due to its proximity to the future Orchard Hills Metro station.	Noted.
Community Engagement		
Consultation and Engagement	A few residents expressed frustration related to the extent community feedback will be considered in determining the project.	Feedback from near neighbours has been documented in this report, which is included in the EIS for the project. Near neighbours and the broader community in Orchard Hills will have an opportunity to provide feedback directly to the DPHI when the SSDA is placed on public exhibition. DPHI will consider feedback received and the project response as they make a decision on the project. HB+B Property may also be required to respond to that feedback before a determination is handed down.
Environmental Impacts		
Traffic Impacts and changing road conditions	A few community members identified potential impacts on local traffic conditions as a key concern. This included concern about a potential change in road safety conditions, especially for children living along Luddenham Road, and concern about whether Luddenham Road will cope with additional truck movements.	A Traffic Impact Assessment (TIA) has been submitted as part of the SSDA. The TIA includes an assessment of potential impacts on local traffic.
Stormwater retention and drainage	There was one question from a near neighbour of the site about where stormwater runoff will be collected.	Stormwater will be collected in an easement that drains to the north of the site.

5.3. ENGAGEMENT TO BE CARRIED OUT

The proponent will continue to keep stakeholders, and the community informed of the project application during the exhibition and determination phases by:

- Continuing to engage with the community about the project, its impacts, and the approval process.
- Enabling the community to seek clarification about the project through the two-way communication channels.

6. ASSESSMENT OF IMPACTS

This section describes the way in which the key issues identified in the SEARs have been assessed. It provides a comprehensive description of the specialist technical studies undertaken regarding the potential impacts of the proposed development and recommended mitigation, minimisation and management measures to avoid unacceptable impacts.

Detailed tables have been provided within the appendices as outlined in **Table 18**. This information includes a reference to where these matters have been addressed in the EIS.

Table 18 Key Appendices

Key Appendix	Reference
SEARs compliance table	Appendix A
Statutory compliance table	Appendix C
Proposed mitigation measures table	Appendix D

The detailed technical reports and plans prepared by specialists and appended to the EIS are individually referenced within the following sections.

Detailed Assessment	Standard Assessment
Design Quality	Ecologically Sustainable Development (ESD)
Built Form and Urban Design	Ground and Water Conditions
Visual Impact	Hazards and Risks
Traffic, Transport and Accessibility	Contamination and Remediation
Trees and Landscaping	Waste Management
Biodiversity	Aboriginal Cultural Heritage
Air Quality	Environmental Heritage
Noise and Vibration	Infrastructure Requirements and Utilities
Water Management	Bushfire Risk
Flood Risk	
Social Impact	

6.1. DESIGN QUALITY

A Design Report (Appendix K) has been prepared by Nettleton Tribe to demonstrate how the proposed warehouse will achieve design excellence. Good design is exhibited by the project, and outlined in accordance with the Better Placed objectives. Alignment with the Better Placed Design principles is outlined in **Table 19**.

In summary, the proposed design of the Storage and Distribution Warehouse seeks to create a corporate, high-quality facility that sets a benchmark for warehousing and logistic developments. The architectural approach ensures a cohesive strategy with the broader AIBP, to emulate a modern and sustainable cohesive estate. Good design and design excellence is realised throughout the built form and landscape design. Further details are explained in **Section 3.6** and **Section 3.7** of the EIS.

Table 19 Better Placed Design Objectives and Design Response

Design Objective	Feature	Design Response
Better Fit	Context and Location	Consideration of the distinctive character of the locality, including prominent natural and built form features, social, economic and environmental conditions. The design responds to these features and seeks to positively contribute to the streetscape and local context. The design also considers the future desired character of the area and its interfaces.
Better Performance	Sustainability	A sustainable landscape within an urban setting was envisioned, seeking to improve the public domain in accordance with the desired future character. Practical and meaningful sustainability measures are integrated into the project which consider shading, ventilation, power generation and water.
Better for Community	Legibility	The built form has a clear identity, and its uses have been clearly defined for ease of operations and use. The overall design has enabled this legibility to compliment the design outcome.
	Community	The design aligns with the local community context and will support its locality by generating employment opportunities.
Better for People	Safety	Safety has been considered and evaluated in the design process to ensure risk and harm are minimised and safe behaviour and is supported.
	Aesthetics	The built form outcome has achieved an elegant, high quality, aesthetic design that stems from the resolution of site constraints and opportunities. The arrangement of built form and space has been considered in its context. The design has addressed the varying scales and form of the building in the selection and association of materials and colour.
Better Working	Functionality and Quality	The design seeks to balance the needs of the user efficiently and effectively. The warehouse has been designed with flexibility and adaptability in mind in order to maximise its operations.
	Landscape	The design recognises that landscape and building operate together and as an integrated and sustainable system.
Better Value	Amenity	The design has successfully responded with the provision of a variety of uses, proximity to supporting amenity as well as optimising internal and external amenity for the users.
Better Look and Feel	Built Form and Scale	The built form successfully responds to its setting and the future character of the locality. The form and scale of the built form enhances the functionality of the space, as well as integrate with the surrounding context so as to present a considered approach to the continuation of employment in the neighbourhood.

6.2. BUILT FORM AND URBAN DESIGN

The proposed built form and detailed site context analysis is described in **Section 3.5** and **Section 3.6** of the EIS. It demonstrates how the proposed built form responds to context and the desired future character of the locality. Further details regarding façade design is also discussed within the identified sections.

In addition, the Architectural Design Report demonstrates the built form height changes through the following figure illustrating the extent of the varying building heights. In order to appropriately address the streetscape, the height is stepped so that the high-bay portion is to the rear of the warehouse. This reduces the visual bulk and scale of the building to create a sympathetic massing when viewed from the primary frontage.

Whilst there is a statutory non-compliance with the Height of Buildings Control under the Penrith LEP, the architectural studies and visual impact investigations at **Section 6.3** emphasise only very minor to almost negligible impacts will be generated by this variation. The accompanying Clause 4.6 Variation Request (**Appendix F**) and concurrent Planning Proposal with Council to amend the height of buildings map for this lot provides further justification.

Figure 19 Building Height Diagram



Source: Nettleton Tribe

6.2.1. Building Code of Australia

Steve Watson and Partners have been engaged to prepare a Building Code of Australia (BCA) Statement of Compliance (**Appendix L**). The proposed design has been assessed against the Deemed-to-Satisfy (DtS) provisions of the relevant requirements under the Building Code of Australia 2022 and applicable Building Regulations.

Compliance is achieved by satisfying the relevant DtS provisions. Where necessary, other aspects of the design may need to be addressed by way of Performance Solutions to meet the performance requirements of the BCA.

6.3. VISUAL IMPACT

A Visual Impact Assessment Report (VIA) (**Appendix JJ**) has been prepared by Geoscapes Landscape Architects to assess the visual impacts from the proposed warehouse. The VIA assessment has been prepared from eight viewpoint locations and include public roads, private property and those from future infrastructure.

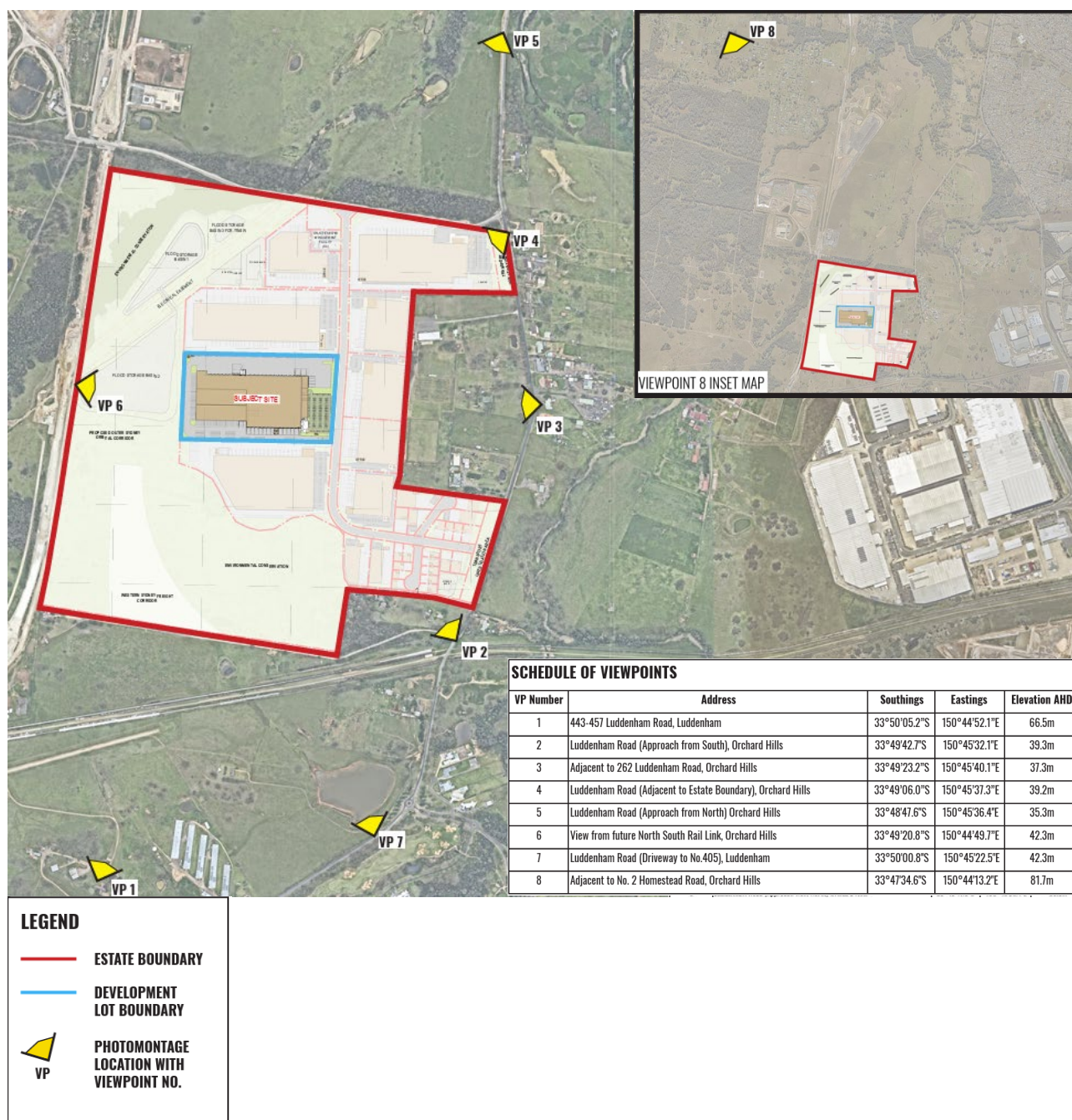
6.3.1. Existing Environment

The existing context surrounding the site is of large lot rural dwellings with associated 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.

Eight viewpoints were assessed as part of the VIA from surrounding locations. These viewpoints are listed below and identified in the following figure. To the south of the site, Viewpoint 1 and Viewpoint 7 were selected to assess the visual impact of the high-bay upon this view. The high-bay is also assessed from Viewpoint 6 from the future North South Rail Link corridor. In addition, whilst existing vegetation would likely result in lower parts of the development being screened from visual receptors to the north and south, the drone photography indicates some view corridors to the high-bay will exist above the tree line.

- Viewpoint 1 – 443-457 Luddenham Road, Luddenham - Looking North
- Viewpoint 2 – Adjacent to 262 Luddenham Road, Orchard Hills - Looking Northwest
- Viewpoint 3 – Opposite Bosna Croatian Club on Luddenham Road, Orchard Hills - Looking Northwest
- Viewpoint 4 – Luddenham Road (Opposite Lot Boundary), Orchard Hills - Looking West
- Viewpoint 5 – Luddenham Road (Approach from North), Orchard Hills - Looking South
- Viewpoint 6 – View from future North South Rail Link, Orchard Hills - Looking East
- Viewpoint 7 – Luddenham Road (Driveway to No.405), Luddenham - Looking North
- Viewpoint 8 – Adjacent to No. 2 Homestead Road, Orchard Hills - Looking Southeast

Figure 20 Viewpoint Locations



Source: Geoscapes

6.3.2. Potential Impacts

The visual impacts of the proposed warehouse were analysed in relation to the visual context and assessed for their likely impact on the local area. Viewpoint 1 and Viewpoint 4 are detailed in the following sections to demonstrate the potential moderate impacts generated by the proposed warehouse and the high-bay component.

Viewpoint 1

The view has been taken from the rear 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.

Figure 21 shows that while the lower parts of the building would be screened, the high-bay would be visible above the tree line and recognised as an industrial warehouse. Consequently, the magnitude of change is considered medium, and the significance of the visual impact at this location is judged to be moderate.

The visual impact of the proposed development, from this location is assessed as **Moderate**.

Figure 21 Viewpoint 1 Assessment



Picture 13 Viewpoint 1 – Looking North, baseline photo

Source: Geoscapes



Picture 14 Viewpoint 1 – Looking North Year 0

Source: Geoscapes



Picture 15 Viewpoint 1 – Looking North Year 15

Source: Geoscapes

Viewpoint 4

The view has been 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.

The visual impact of the proposed development, from this location is assessed as **Moderate**.



Picture 16 Baseline Photo Luddenham Road (Approach from north), looking West

Source: Geoscapes



Picture 17 Viewpoint 4 – Year 0 Luddenham Road (Approach from north), looking West

Source: Geoscapes



Picture 18 Viewpoint 4 – Year 15 Luddenham Road (Approach from north), looking West

Source: Geoscapes

The VIA concluded that the proposed development will generally create visual impacts of moderate significance at two viewpoints. A summary of the visual impacts generated at each viewpoint is listed in the following table. The proposal includes high bay receptors with elevated more open aspects at further distances which have been considered. The views include public roads, private property and those from future infrastructure.

The views experienced by passing motorists or pedestrians in very close proximity to the site are transient, only temporary and therefore, impacts will be less significant. The VIA demonstrates that the architectural team have given careful consideration to building materials and colours to reduce the visual impacts in regard to bulk and scale.

Table 20 Visual Impact from the proposed planning envelope

Visual Impact	Locations
Nil	Luddenham Road (Approach from South), Orchard Hills - (VP2)
Minor Negligible	Luddenham Road (Approach from North), Orchard Hills - (VP5)
Moderate/minor	- View from future North South Rail Link, Orchard Hills - (VP6) - Luddenham Road (Driveway to No.405), Luddenham - (VP7)
Minor	- Adjacent to 262 Luddenham Road, Orchard Hills - (VP3) - Adjacent to No. 2 Homestead Road, Orchard Hills - (VP8)
Moderate	443-457 Luddenham Road, Luddenham - (VP1) - Luddenham Road (Adjacent to Estate Boundary), Orchard Hills - (VP4)

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, this includes views from VP4.

In addition, proposed planting at the property boundaries include medium and large canopy trees which will help soften the view of the development. Though the lower half of the building is screened by existing vegetation in VP1, the high-bay is visible above the tree line. This will create a new element that would be recognised by the residential receptor as an industrial building. Though this is a tall element within this view it is located at a distance of 1.3km and at this distance does not dominate the character and patterns of the landscape so that these are no longer recognisable. As such, the built form and landscape design features effectively contribute to minimising visual impacts of the high-bay component. The size and scale of the proposed warehouse is not clearly visible at these viewpoints within the surrounding public domain. This demonstrates the perceived bulk and scale for surrounding receptors will be significantly managed and no major impacts are created by this height variation.

Overall, the VIA demonstrates the visual impacts range from moderate to minor/negligible. The moderate visual impacts are only experienced at two viewpoint locations, which were discussed to be appropriately managed through future development of the AIBP and landscaping which will screen views.

6.3.3. Mitigation Measures

The VIA recommends several landscape strategies to reduce visual impact, which include:

- A mix of large and medium evergreen indigenous and native canopy trees to be planted within a 10m landscape setback along the site's eastern boundary. Similar landscaping to be applied to the north, south, and western boundaries to screen the building's lower levels.
- Canopy cover to be maximised, especially in car parking areas, to mitigate the urban heat island effect, complemented by shrub and groundcover planting.
- High-quality landscaping, including feature fencing and entry treatments, planned throughout the AIBP estate.

6.4. TRAFFIC, TRANSPORT AND ACCESSIBILITY

A Traffic Impact Assessment (TIA) (**Appendix HH**) has been prepared by Arcadis to assess the potential traffic impacts generated by the proposed construction and operation of the warehouse including traffic volumes, surrounding network capacity, site access and manoeuvring.

In addition, a Green Travel Plan (GTP) (**Appendix W**) and a Construction Traffic Management plan (CTMP) (**Appendix P**) have also been prepared by Arcadis.

6.4.1. Existing Environment

Existing Road Network

The surrounding road network is described below:

- Luddenham Road: a regional road under the control and management of Council. It is a two-way road that carries approximately 3,000 vehicles per day.
- Patons Lane: a local road under the control and management of Council, and is a two-way road. Recent traffic surveys indicated Patons Lane carries approximately 1,260 vehicles per day, due to the construction of the Sydney Metro project. Lower daily traffic volumes are expected once construction of the Metro is completed.
- Mamre Road: a state road under the control and management of TfNSW. It is a two-lane undivided carriageway, set within a 45-metre-wide road reserve. Mamre Road carries approximately 15,000 vehicles per day and passes through the Western Sydney Priority Growth Area to provide connections to the Western Sydney Employment Area (WSEA), making it a key route for regional trips.
- Elizabeth Drive: a state road under the control and management of TfNSW. It carries approximately 11,000 vehicles per day and is configured as a two-lane undivided carriageway with unsealed shoulders set within a 35-metre-wide road reserve. To the east, Elizabeth Drive connects to the Westlink M7 Motorway and to the west it connects with The Northern Road.

Public & Active Transport Network

The area is currently underserved by public transport. In proximity to the site, there are three bus services (Routes 775, 776 and 779) that operate in the St Clair/ Erskine Park area to the northeast of the site. No bus services connect past the site to the south. The level of service provision reflects the low travel demands of the locality.

In terms of active transport, there is currently limited pedestrian or cyclist infrastructure provided in the vicinity of the site, mainly due to the nature of land use in the vicinity and the limited demand for such facilities at present.

Future Development and Upgrades

The area and road network around the site are expected to undergo significant changes over the next 20 years to support the growth of the broader the Greater Penrith to Eastern Creek (GPEC) Growth Area, Western Sydney Employment Area (WSEA) and the Aerotropolis. Key road changes and upgrades within proximity to the site is summarised below and illustrated in the following figure.

- Sydney Metro – Western Sydney Airport, a new metro railway connecting the new WSI Airport with Greater Western Sydney, providing connections to the existing T1 Western Line. It comprises of six stations, including one at Luddenham which is 1km south of the site and one at Orchard Hills, 3km north of the site. Luddenham Station will provide an interchange with future bus and active transport networks.
- The Outer Sydney Orbital (OSO) is a future north south motorway and freight rail line that will support the growth of Western Sydney and the distribution of freight across Sydney and regional NSW. The alignment runs directly along the site's western boundary. It is expected that some portion of land would be acquired for the OSO project in the future.
- The M12 motorway project will provide direct access between the Airport at Badgerys Creek and Sydney's motorway network, connecting the M7 Motorway, Cecil Hills, and The Northern Road, Luddenham.

- The Mamre Road upgrade will provide an additional lane in each direction for the 10km length between the M4 Motorway and Kerrs Road, as well as a wide central median for the provision of an additional traffic lane in the future. Preliminary designs indicate the intersection of Luddenham Road and Mamre Road, will be converted to traffic signals as part of this project.
- The Elizabeth Drive Upgrade will provide an additional lane in each direction between the M7 Motorway at Cecil Hills and The Northern Road at Luddenham, with future provision for additional lanes. Preliminary designs indicate the Luddenham Road and Elizabeth Drive intersection will be converted to traffic signals.
- The proposed Western Sydney Freight Line will be a dedicated freight rail line running from the future OSO near Luddenham to the M7 Motorway. This new freight line will allow the transport of goods by rail across Western Sydney, linking growing industrial areas and distribution centres. The current proposed rail alignment is to the south of the site.
- The potential upgrade of Luddenham Road, which will provide an additional lane in each direction along the length of Luddenham Road between Mamre Road and Elizabeth Drive, with future provision for additional lanes.

Figure 22 Road upgrades and projects in proximity to the site



Source: Arcadis

6.4.2. Potential Impacts

An assessment of traffic impacts has been undertaken to understand the implications of the proposed development and the performance of the surrounding network. Overall, it demonstrates the traffic demands associated with the potential development during construction and the operation of the site is expected to be accommodated safely.

6.4.2.1. Construction

Cumulative Construction

A cumulative construction assessment has been conducted to reflect the concurrent construction activities of the AIBP in 2025 to 2026. The assessment was completed and approved under the bulk earthworks local DA. With consideration of the AIBP construction program, the cumulative assessment considers peak construction traffic from each project. During this period, the storage and distribution warehouse construction will be yet to commence, and the southern intersection upgrade works will be completed. Therefore, traffic volumes from these construction activities have not been considered in the cumulative assessment.

The cumulative construction traffic impact assessment was modelled to assess:

- Base Case – 2025 traffic conditions, as per survey conducted by Matrix and calibrated to reflect the surveyed queue lengths.
- Scenario A – 2025 traffic conditions, including traffic data from the STFM model on Luddenham Road, Sydney Metro peak EIS construction traffic and 2024 Trans Traffic Survey on Patons Lane, without construction traffic from AIBP works.
- Scenario B – 2025 cumulative peak hour AIBP construction traffic demand combined with background traffic.

These scenarios have demonstrated the intersections will perform at LoS F, which is unsatisfactory. Accordingly, a Construction traffic Management Plan has been prepared with a range of mitigation and management measures needed to manage the impacts to traffic and transport during construction.

6.4.2.2. Operation

Traffic

Operational trip generation rates are based off the RMS Trip Generation data – Industrial Parks (2023). It has been used to estimate the total AM and PM peak operational traffic movements, which are summarised in the following table.

Table 21 Operational Traffic Generation

Vehicle Type	AM Peak (7:00 – 8:00am)			PM Peak (5:00-6:00pm)		
	IN	OUT	TOTAL	IN	OUT	TOTAL
Light Vehicles	120	7	127	7	107	114
Heavy Vehicles	13	51	64	51	13	64
Total	133	58	191	58	120	178

The TIA employs traffic modelling SIDRA Network Software to determine the impacts at the Luddenham Road/ Patons Lane intersection and Patons Lane/ Site Access A intersection. For each of these intersections, two scenarios are considered, as follows:

- Scenario A: 2027 AIBP development with storage and distribution operational demand and adjacent warehouse's operational demand.
- Scenario B: 2036 AIBP development with storage and distribution operational demand and complete AIBP masterplan operational demand.

Detailed modelling for the overall AIBP, which includes the proposed storage and distribution warehouse, was conducted under the approval local DA. It confirms no adverse impact on the traffic distribution of the surrounding road networks.

The following intersections were assessed in the scenarios as part of this traffic impact assessment:

- Luddenham Road and Patons Lane: The intersection was modelled as a signalised intersection where Luddenham Road was modelled as two lanes on the north approach and four lanes on the south approach. Patons lane was modelled as two lanes on both east and west approach.
- Patons Lane and Site Access Road: The intersection was modelled as a two-lane roundabout with Patons Lane modelled as two lanes on both east and south approaches and one lane on the west approach.

The assessment identified that the Patons Lane and Site Access Road intersection meets both the traffic performance criteria for capacity and delay in the ultimate state scenario. For the Luddenham Road and Patons Lane intersection, the signalised intersection treatments meet the traffic performance criteria for delay in the ultimate state scenario.

Overall, the comparison of traffic demand against the broader AIBP traffic impact assessment and the operational traffic generated by the proposed warehouse, the future road network will accommodate the operational traffic. The total traffic demand for proposed development is less than the modelled demand, with the SIDRA results demonstrating both the Site Access Road/ Patons Lane and Patons Lane/ Luddenham Road intersections performing at a LoS C or better in both scenarios.

Parking

The proposed warehouse is subject to the Penrith DCP E18 parking provisions. The TIA demonstrates the provided car parking meets the anticipated demands generated by the site. Provisions for accessible parking and bicycle parking will be accommodated during further development of the proposal.

Manoeuvrability and Access

The internal configuration of the site has been designed in accordance with Council's DCP and the relevant Australian Standards. A swept path analysis has been completed for the warehouse hardstand movements to accommodate B-double truck movements. The TIA confirms the clearances for the trucks in this area is sufficient.

6.4.3. Mitigation Measures

Construction

The CTMP has been prepared to enable the safe management of traffic, provide for the safety of construction personnel, and minimise impacts on the local community. It confirms the proposed warehouse is suitable for approval subject to the implementation of the following mitigation measures:

- Heavy vehicle exit route will be separate from the construction workers private vehicle access, to minimise traffic congestion within the AIBP internal road network.
- Construction signage is to be placed on the approaches to the proposed site, visible for each transport mode, warning the public of the construction works.
- Construction vehicles are to be fitted with safety flashing lights located on the top of the vehicle and functioning reverse beepers, with certified personnel operating them.
- Temporary parking zones are to be set up within the construction site to allow workers to access a safe, separated area which will not impede on any of the warehouse construction activities.
- Consultation be conducted with local council and relevant community stakeholders to ensure traffic changes during the works are communicated and managed.

Additional construction mitigation and management measures have been identified by the TIA to be implemented where practical and necessary.

- Detailed Traffic Guidance Schemes would be prepared and implemented by suitably qualified personnel for each stage of construction.
- Road dilapidation surveys are to be completed around the site before and after the construction stage. Any damage to roads will be repaired.
- When construction vehicles are using Patons Lane for access and egress during off peak periods, full time traffic controllers will be located at the Luddenham Road and Patons Lane intersection, east of the Patons Lane site access. In addition, full time traffic controllers will be located at the existing site access

driveway on Luddenham Road, south of the existing Luddenham Road and Patons Lane intersection. This will ensure traffic movements to/ from the AIBP site are coordinated with Sydney Metro construction vehicle movements, to minimise disruptions for construction activities and deliveries.

- During the AM and PM peak hours, Sydney Metro construction traffic will be given priority access via Patons Lane. To reduce congestion, traffic controllers will assess the traffic conditions and, if required, will divert any AIBP construction vehicles to access the site via the existing driveway on Luddenham Road.
- Traffic surveys are to be undertaken during construction around the site of works, to monitor how the site is being accessed by AIBP vehicles and to give confidence that AIBP construction traffic is not contributing to delays for Sydney Metro construction vehicles.
- AIBP construction vehicles are not permitted to access the site during critical OSOM deliveries for Sydney Metro. OSOM deliveries will have priority access to Patons Lane overnight, and Sydney Metro will provide notice to the AIBP site team of their delivery schedule.
- All significant construction vehicles would be fitted with safety flashing lights located on the top of the vehicle and functioning reverse beepers. All operators will be licensed for the plant/ equipment.
- Accessways to the site would be provided with adequate sight distances to allow visibility for emerging vehicles.

Operation

The TIA is supported by a GTP to encourage non-private vehicle access to the site during operations. The GTP outlines management measures and recommendations that can be adopted to support the use of sustainable transport modes. The range of measures are summarised below and will be implemented where possible.

- Introduce a travel coordinator role to execute the recommendations of this plan.
- Monitor the mode share, use and demand of facilities to inform future updates of the GTP.
- Prepare a Transport Access Guide that is provided to building occupants that details transport options to the site, a public transport map surrounding the site area, site specific transport provisions, and promotes the cost savings of car share.
- Hold Travel Smart Get to Workdays in the form of workshops encouraging employees to travel by walking, cycling and public modes of transport. Similarly, participate in annual events such as 'Ride to Work Day'.
- Work with other stakeholders to improve wayfinding signage to public transport (bus stops, future rail networks) between the development and nearby infrastructure hubs such as St Clair and Erskine Park.
- Produce maps and timetables detailing safe and pleasurable walking routes to and from the building with times, to local facilities, such as shops and bus stops, a map showing public transport stops in the surrounding area and expected walk times needed to access the locations, and a train and bus timetables for services in the local area as part of household welcome packs for all new employees.
- Supply a communal bicycle repair toolkit for employees and visitors. Come to an arrangement with a local bicycle retailer for servicing of bikes and other incentives.
- Ensure the bicycle parking and end of trip facilities within the building are maintained.
- Allocate spaces as required for car-sharing within the Storage and Distribution warehouse.

6.5. TREES AND LANDSCAPING

Geoscapes has prepared the Landscape Plans (**Appendix AA**) for the proposed development to illustrate the landscape treatments and planting species proposed. As clearing and site preparation works were completed under the approved Bulk Earthworks DA, no trees are proposed to be removed as part of this application.

The following figure illustrates the proposed Landscape Masterplan. The landscape design seeks to contribute to the long-term landscape setting of the site and locality by introducing large canopy trees to the front landscape setbacks. This has been supplemented with neat, layered planting of shrubs and

groundcovers. Additional tree planting in the car park and the selection of native and indigenous species to address urban heat island effect. The proposed design addresses urban heat island effect through the application of canopy trees along the property setbacks to provide shade, as well as to car park areas to achieve 40% car park area coverage.

Figure 23 Landscape Masterplan



Source: Geoscapes

Consistency with Greener Places is achieved through consideration of the Greener Places Principles and application of the Design Guide as part of the landscape design process. Consistency is demonstrated in the following section.

Table 22 Greener Places Landscape Response

Greener Places	Category	Project Response
Principles	Integration	The landscape design integrates green infrastructure with the locality by selecting plant species that reflect the local indigenous and native plant communities. This approach enhances biodiversity and strengthens ecological resilience. This will establish a connection between the site's ecological system, the AIBP and the surrounding streetscapes. The 228 trees proposed will be planted to restore biodiversity and create new habitats.
	Connectivity	The introduction of native and indigenous vegetation, including trees, shrubs, and groundcovers, to the north, south, and east of the site will establish both visual and ecological connections to adjacent AIBP developments and the streetscape of the Alspeck Manufacturing Warehouse. Additionally, the vegetation on the west side of the site will strengthen ecological links to Flood Storage Basin 2 and the Outer Sydney Orbital Corridor.
	Multifunctionality	Large trees and dense evergreen species from local plant communities are incorporated along the site boundaries to better absorb the development into the landscape at a human scale. This includes an additional proposed canopy cover, which helps mitigate climate change and enhancing the quality of life by creating lush visual appeal and habitat for both on-site workers and wildlife.

Greener Places	Category	Project Response
	Participation	The planning process has been inclusive, incorporating the knowledge and input of a diverse range of stakeholders, including the NSW Government and Council. In addition, both local and state Green Infrastructure policies and actions have been carefully considered and implemented throughout the process.
Design Guide	Open Space	The proposed landscaping near the office and outdoor area is designed to enhance visual quality, promoting social interaction and supporting the physical and emotional well-being of employees. Similarly, the proposed landscape at the pedestrian entry and street frontage aids in screening the development. The landscape design incorporates native or indigenous groundcovers, grasses, canopy trees, and feature shrubs, all sourced locally. This approach strengthens the ecological connection to the surrounding environment, increases biodiversity, and creates a seamless transition between the development and its local context. The design fosters a connection to nature and support the health of the local plant community, reflecting our commitment to sustainable, vibrant, and inclusive outdoor spaces that enhance the quality of life for all users.
	Urban Tree Canopy	Trees play a crucial role in mitigating the urban heat island effect, including a total 6,940 sqm of canopy cover. This strategy enhances the urban tree canopy and helps mitigate the urban heat island effect and cooling the surrounding environment. Along the site boundary and driveway, a diverse line of native evergreen tree plantings has been introduced to enrich both the urban landscape and the local plant ecosystem. These trees provide seasonal variation, support wildlife habitats, and establish a biodiversity corridor linking our site to the adjacent development. In the car park, 40% of the proposed tree canopy cover is provided within the parking area. Trees have been strategically positioned within planting blisters, with an extended layer of Amsterdam tree soil, to maximise canopy cover and shade.
	Bushland	Bushland is essential to enhancing urban liveability and elevating the quality of life for all living organisms. To prevent further habitat and biodiversity loss, a planting mix of indigenous trees, shrubs, and groundcover species will be introduced across all landscaped areas. This strategy will create an urban habitat corridor that links to the broader green infrastructure network, ensuring the long-term viability of both plant and animal species.

6.6. BIODIVERSITY

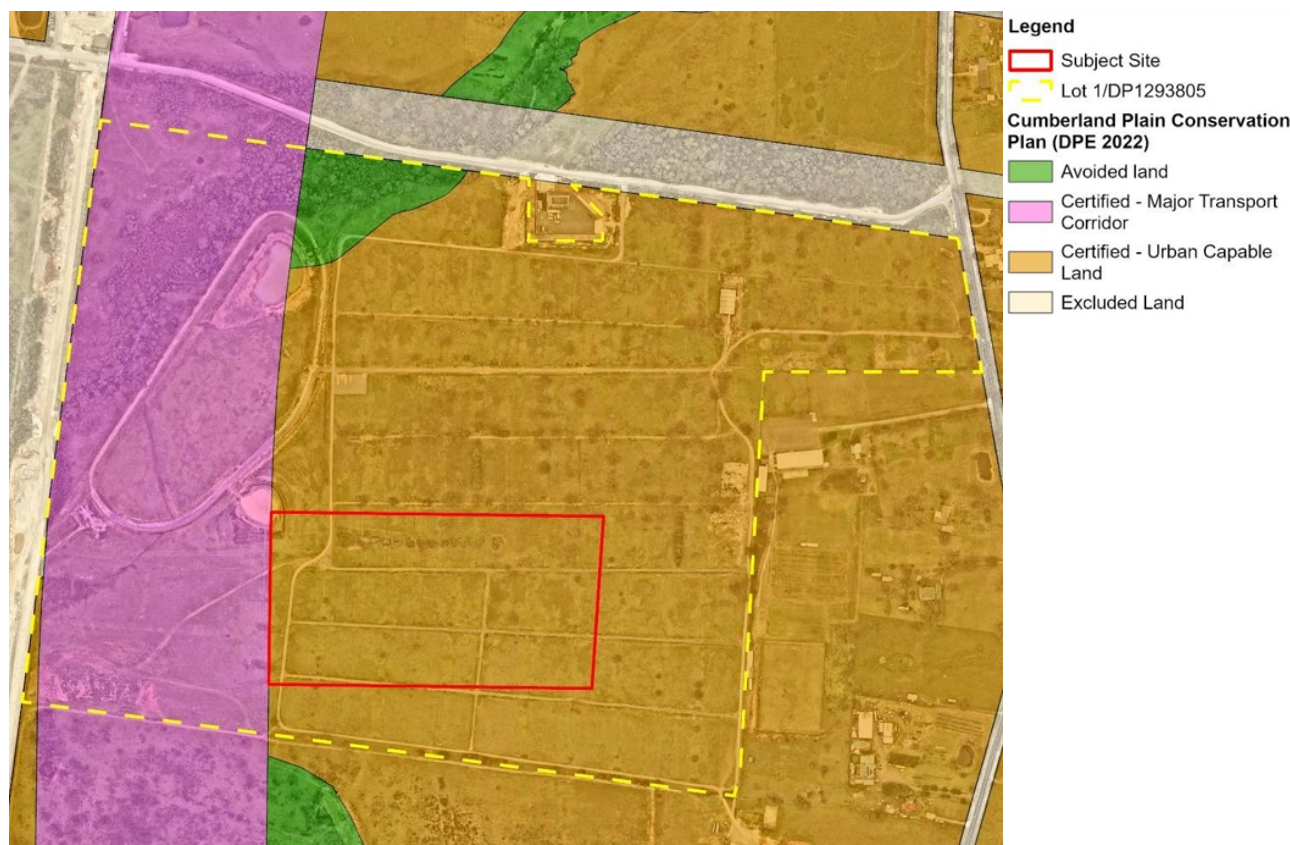
A Biodiversity Management Plan (BMP) Letter (**Appendix M**) has been prepared by Ecoplaning to demonstrate the proposed developments compliance with the applicable biodiversity measures conferred by the biodiversity certification.

6.6.1. Existing Environment

The site is part of the Greater Penrith to Eastern Creek Investigations Area under the Cumberland Plain Conservation Plan (CPCP). The site is mapped as 'certified – Urban Capable Land' under the CPCP, with a thin strip of land along the western boundary mapped as 'Certified – Major Transport Corridors'. The following figure includes a map of the certification.

For the purposes of this assessment, consideration of the major transport corridor will not be incorporated given the ongoing consultation with the authorities regarding the development at this edge. Therefore, the site will be treated as only 'Certified – Urban Capable Land'.

Figure 24 Biodiversity Certified Land under the Cumberland Plain Conservation Plan



Source: Ecoplanning

6.6.2. Potential Impacts

Under Part 13.5 of the Biodiversity SEPP, development consent must not be granted to development on this land zoning unless the consent authority has considered whether the development is consistent with the CPCP Mitigation Measures Guideline. Accordingly, a compliance assessment against these measures has been completed to confirm the proposed developments consistency.

6.6.3. Mitigation Measures

The following mitigation measures from the CPCP are to be implemented in the proposed development.

CPCP Mitigation Measure	BMP Site Specific Application	Applicability to Proposal
Retain large trees (including dead trees but excluding noxious weeds) ($\geq 50\text{cm}$ DBH) during precinct planning where possible and avoid impacts to soil within the dripline of these trees during construction.	Prioritise retaining trees where possible. All trees to be retained will be appropriately protected during the entire extent of the works, e.g., temporary fencing, flagging and tree protection. No personnel or machinery is to enter the area	N/A. No trees remain on the SSDA subject site following completion of work approved under the Bulk Earthworks DA.
Retain areas of high density Proteaceae shrubs where possible, particularly along riparian corridors.	The riparian corridor vegetation is to be protected throughout construction. No machinery or personnel are to enter.	N/A – The SSDA does not encroach upon riparian corridors.

Undertake preconstruction surveys prior to removal or disturbance (seasonally dependent, before torpor) to human made structures to ensure any roosting habitat for microbat species including mine shafts, storm water tunnels, old or derelict buildings, bridges and culverts, are retained where possible.	Prior to demolition of structures on site, they are to be inspected by a suitably qualified ecologist for the presence of microbats and other fauna. All fauna is to be relocated safely to a suitable location.	N/A – No buildings or ancillary exist on the SSDA subject site.
Modify pest control techniques implemented during construction and operation of the development and under the pest control strategy to reduce risk of secondary poisoning.	If pest control is used it will be done in consultation with a qualified specialist and aim to reduce the risk of secondary poisoning.	If pest control is used it will be done in consultation with a qualified specialist and aim to reduce the risk of secondary poisoning.
Establish a 100m minimum setback for development around flying fox camps. The setback area should be maintained free of flying fox roosting habitat.	N/A – No flying fox camps are within 100m of the subject site.	N/A. No flying fox camps are within 100m of the subject site.
Raptor nests require a 500 m circular setback from nest locations in undisturbed bushland or 250m for nests adjacent to existing development. Owl nests require a 100 m circular setback from nest locations.	Prior to vegetation clearing trees are to be inspected for the presence of nests by a qualified ecologist.	N/A. No trees remain on the SSDA subject site following completion of work approved under the Bulk Earthworks DA.
Incorporate best-practice site hygiene protocols to manage the potential spread of pathogens, such as <i>Phytophthora</i> and myrtle rust within or adjacent to potential habitat for relevant species	Manage the spread of <i>Phytophthora cinnamomi</i> as far as practical. See Appendix F of the FFA (Ecoplanning 2024b) for best practice methods.	Manage the spread of <i>Phytophthora cinnamomi</i> as far as practical. See Appendix F of the FFA (Ecoplanning 2024b) for best practice methods.
Consult with relevant land managers to implement critical actions for Cumberland Plain land snail under the Save our Species program (EES, 2020) on public land adjacent to urban development during construction and operation of the development, taking into account relevant guidance in the weed control implementation strategy and the fire management strategy.	Prior to construction vegetation is to be surveyed by a qualified ecologist for Cumberland Plain Land Snail. If identified, consultation is to occur with the relevant land managers under the Save our Species program on how to manage the species.	N/A. Vegetation and topsoil will have been stripped from the study area under the Bulk Earthworks DA.
Implement 'open structure design' when designing structures such as roads adjacent to known populations of Cumberland Plain land snail where possible, consistent with the critical actions for this species under the Save our Species program (EES 2020).	Prior to construction vegetation is to be surveyed by a qualified ecologist for Cumberland Plain Land Snail. If identified, implement 'open structure design' when designing structures such as roads	N/A. Vegetation and topsoil will have been stripped from the study area under the Bulk Earthworks DA.

	adjacent to known populations of Cumberland Plain land snail where possible, consistent with the critical actions for this species under the Save our Species program.	
Incorporate best-practice site hygiene protocols to manage the potential spread of pathogens, such as <i>Phytophthora</i> and myrtle rust adjacent to potential habitat for relevant TECs	Manage the spread of <i>Phytophthora cinnamomi</i> as far as practical. See Appendix F of the FFA for best practice methods.	Manage the spread of <i>Phytophthora cinnamomi</i> as far as practical. See Appendix F of the FFA for best practice methods.
Manage weeds for flora populations and habitat adjacent to urban and infrastructure development during construction and operation of the development, considering relevant guidance in the weed control implementation strategy.	Manage weeds using best practice hygiene methods in accordance with the NSW Biosecurity Act. Any waste containing weed propagules must be disposed of at an appropriately license waste facility.	Manage weeds using best practice hygiene methods in accordance with the NSW Biosecurity Act. Any waste containing weed propagules must be disposed of at an appropriately license waste facility.
Consult with managers of land containing known populations or habitat for relevant species (<i>Dillwynia tenuifolia</i> , <i>Grevillea juniperina</i> subsp. <i>juniperina</i> <i>Pultenaea parviflora</i>) to mitigate indirect impacts from fire during construction and operation of the development, considering guidance in fire management strategy.	N/A. No threatened flora populations are present	N/A. No threatened flora populations are present
Consult with land managers of land containing known populations or habitat for relevant species (<i>Dillwynia tenuifolia</i> , <i>Grevillea juniperina</i> subsp. <i>juniperina</i> <i>Pultenaea parviflora</i>) to mitigate indirect impacts from human disturbance during construction and operation of the development, including controlling public access, managing maintenance activities such as mowing and slashing, and managing rubbish dumping.	N/A. No threatened flora populations are present	N/A. No threatened flora populations are present

6.7. AIR QUALITY

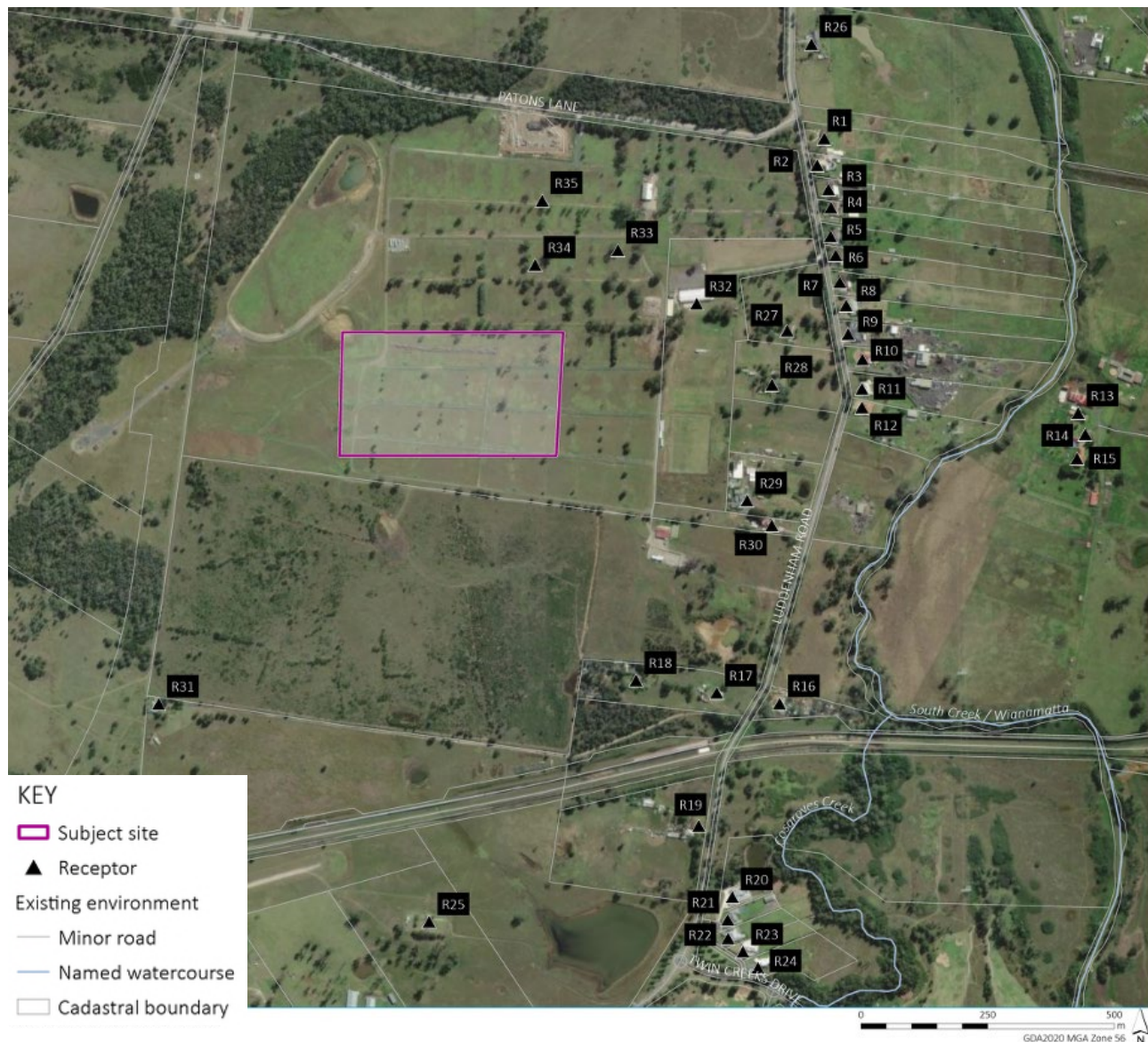
An Air Quality Impact Assessment (AQIA) (**Appendix I**) has been prepared by EMM to identify air emission sources during construction and operations of the development and their potential impacts.

6.7.1. Existing Environment

The site has several sensitive receptors surrounding the property. The nearest residential zone is an area of R2 Low Density Residential within the suburb of St Clair, approximately 1.6 km north-east of the AIBP and

an area of C4 Environmental Living within the Twin Creeks residential neighbourhood, approximately 1.0 km south of the AIBP. The surrounding residential properties are identified in the following figure.

Figure 25 Receptor Locations



Source: EMM

Neighbouring sources of air emissions was investigated for surrounding industrial air pollutant emissions. The site is approximately 0.7 km south-east of Bingo Industries' Patons Lane Resource Recovery Centre and approximately 0.2 km south-west of the Alspec Industrial warehouse.

In addition, background air quality was analysed using the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) air quality monitoring stations (AQMS) at St Marys approximately 2.7 km north of the site and at Bringelly approximately 10.8 km south of the site. Data from the two stations were collated for the period between 2020 and 2024. The following key statistics were analysed:

- Exceedance of the 24-hour average criterion occurred in two of the five years studied between 2020 and 2024, ranging from 12 days in 2020 to no days between 2022 and 2024.
- A high trend in the magnitude of recorded concentrations in early 2020, coinciding with the Black Summer bushfires between October 2019 and February 2020.
- The recorded PM10 concentrations decrease during 2020, associated with the onset of La Niña conditions (i.e. increasing rainfall and reduction in drought conditions).

- Recorded exceedances of PM_{2.5} in 2023 were largely attributed to hazard reduction burns and low wind conditions impacting the region.

6.7.2. Potential Impacts

Potential air pollutants may be generated by the proposed development. Emission sources will consist of mobile combustion sources (fuel combustion from vehicles) and fugitive emissions from vehicle movements. The likely pollutants to be generated by the proposed development are particulate matter (PM₁₀ and PM_{2.5}) and gaseous pollutants (NO₂).

Construction

Construction impacts were assessed as part of the AQIA prepared for the initial bulk earthworks DA for the AIBP. The construction AQIA determined the risk of dust soiling impacts to be medium to low, and the risk of human health impacts to be low. Mitigation measures listed in the construction AQIA were considered sufficient to ensure off-site impacts were effectively managed.

Operation

The potential sources of air pollutant emissions from operational activities are anticipated to be vehicle exhaust emissions from the movement of truck and light vehicles around the site, and wheel-generated particulate matter emissions from the movement of trucks, forklifts and light vehicles on paved surfaces. Emissions from these activities are expected to be minor due to the short-term nature of occurrence and separation from sensitive receptors. As the nearest residential areas to the AIBP are located approximately 1km-1.6km from the site, no quantification of operational emissions or associated impacts have been undertaken. The AQIA confirms no other significant sources of air pollutant emissions were identified from the proposed development. Therefore, potential impacts to air quality from the proposed development is anticipated to be negligible and unlikely to adversely impact upon the surrounding environment.

Odour emissions and impacts are assumed to be negligible and not requiring further assessment. This is because the activities primarily relate to handling and storage of pre-packaged beverages. No brewing or processing of beverage products will occur at the proposed development.

Overall, potential impacts to air quality from the proposed development are anticipated to be negligible and unlikely to adversely impact upon the surrounding environment.

6.7.3. Mitigation Measures

No mitigation measures were identified within the AQIA given the operational emission sources are expected to be minor. No impacts were identified and therefore no mitigation measures are proposed.

6.8. NOISE AND VIBRATION

A Noise and Vibration Impact Assessment (NVIA) has been prepared by EMM Consulting to assess the potential construction and operational noise and vibration impacts generated by the proposed storage and distribution warehouse. Previous noise assessments have been completed for the AIBP based on the indicative site masterplan. This was employed to confirm compliance with relevant noise criteria.

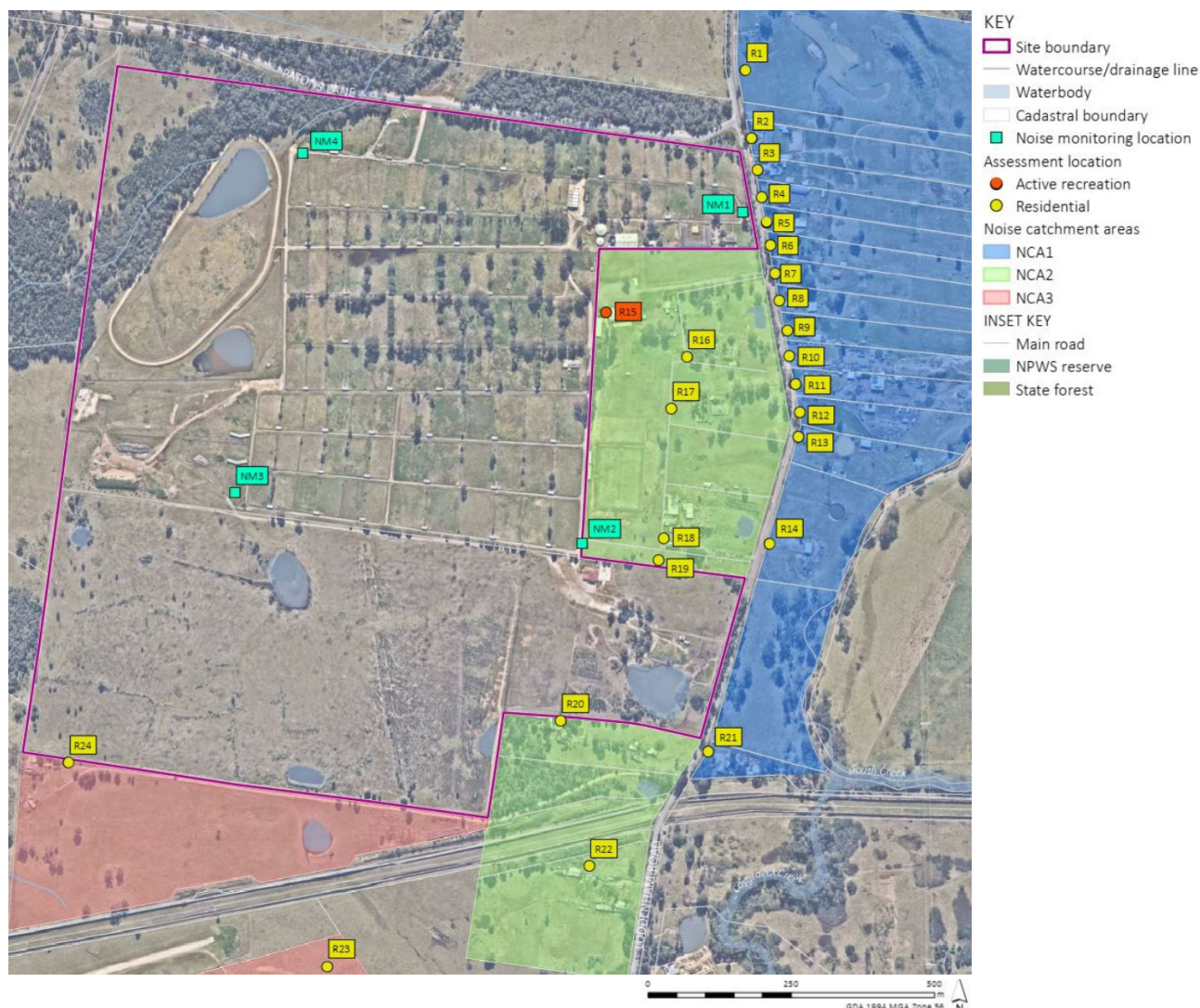
6.8.1. Existing Environment

The locality was reviewed for noise assessment locations as part of the AIBP masterplan, which will also be used for this assessment of the site. The offsite assessment locations that could potentially experience noise from the development have been categorised into three noise catchment areas (NCAs). The NCAs are described below and identified in **Figure 26**.

- NCA1 represents residential assessment locations on the eastern side of Luddenham Road. The dwelling façades face the development and Luddenham Road; they are exposed to road traffic noise.
- NCA2 represents residential assessment locations on the western side of Luddenham Road. These properties are all set back from Luddenham Road and would be expected to experience lower noise from existing road traffic which is consistent with noise monitoring conducted at the site. It is noted that these residential properties have been included in the precinct structure plan and rezoned to E4 General Industrial.
- NCA3 represents remote assessment locations which are well removed from Luddenham Road.

It is important to note that HBB Property entered into a sales agreement for the residential dwelling at R19 (287 Luddenham Road). This dwelling is the closest receiver to the site and adjoins a proposed driveway to the AIBP. The dwelling is expected to be vacated prior to construction work.

Figure 26 Noise Monitoring and Assessment Locations



Source: EMM Consulting

Noise monitoring was completed to evaluate the existing noise environment surrounding the site. Four unattended noise loggers were deployed to surrounding locations which represented the acoustic environment at the nearest assessment locations in proximity to Luddenham Road and at locations further removed from it. The location of the noise loggers are identified in the figure above.

The results of the existing background and ambient noise levels were recorded and identified within the NVIA. It demonstrated noise levels measured at NM2, NM3 and NM4 indicate that the evening RBL is consistently higher than the day RBL. Monitoring was done during the colder winter months which would typically negate insect noise which more commonly contributes to higher evening noise levels. Analysis of data for NM1 and NM2 show noise levels typical of regular morning and afternoon peak traffic flows. Given their proximity to Luddenham Road it is clear this is the source of elevated evening background noise. As the source of elevated evening background noise levels at location NM3 and NM4 is less clear minimum background levels will be used for the evening at these locations.

6.8.2. Potential Impacts

The noise and vibration impacts were assessed to confirm no adverse exceedances will be generated by the proposed warehouse to nearby sensitive receivers.

Construction Noise

The construction noise assessment reviewed construction equipment sound power levels. Earthworks and site-preparation are expected to be the most significant noise impact. Works associated with commissioning and landscaping will generate significantly lower noise levels than the site preparation works. The worst case predictions for construction were used, therefore the range of predicted noise levels represent the predicted worst case impact for the range of receptors in the noise catchment area.

Table 23 Predicted Construction Noise Levels

Noise Catchment Area	Predicted Noise Level	Construction NML	Highly Noise Affected Level	Exceedance of Construction NML	Exceedance of Highly Noise Affected Level
NCA1	38-48	50	75	Nil	Nil
NCA2	41-50	45	75	Up to 5 dB	Nil
NCA3	41-46	45	75	Up to 1 dB	Nil
Receiver R15 (non-residential)	51	65	N/A	Nil	N/A

The results outlined in **Table 23** convey construction noise levels are predicted to comply with the construction NML at NCA1 and R15 at all times. The range of noise levels expected at NCA2 and NCA3 will at times comply or exceed NMLs by up to 5dB for NCA2 and 1 dB at NCA3. No exceedances of the highly noise affected level are predicted.

Operational Noise

Operational noise impact from the development has been modelled using the proposed AIBP masterplan, in which all warehouse and office buildings proposed within the AIBP are included as barriers in the noise model. Additional operational noise activities consider include:

- **Traffic movement:** B-doubles and semi-trailers will generally be loaded and unloaded on the two northern hardstand areas. The south-eastern hard stand is proposed to be used by small trucks and delivery vans for wholesale and smaller format deliveries. Each truck has been modelled as arriving at site by the south-east entrance and departing from site via the northeast exit. Trucks were generally observed to be shut down whilst being loaded during the site visit. Each truck has been assessed to be idling for 5 minutes after arrival or before departure. Trucks have been assumed to be travelling at 10km/hr on site.
- **Material Handling:** Forklifts were the dominant noise source and the only component of material handling relevant to this assessment. The client has advised that electric forklifts will be the primary means of freight handling on hardstand areas. Four forklifts will operate on the southern hardstand between approximately 3pm and 7am to load the delivery vans. On the Northern dock approximately half of all freight inbound and outbound freight will occur via the skate docks. The remaining freight on the hardstand will be handled with up to ten forklifts and this will typically occur between the hours of 6am to 9pm. The client has advised that additionally there may be up to three forklifts in operation between 5am and 10pm performing general tasks on the hardstand under the awning.
- **Mechanical Plant:** The proposed warehouse includes a plant room at ground level immediately to the west of main office. Based on plant mechanical services tender information a sound power of LAeq 95 dB has been used to represent condensers in the plantroom and a sound power of LAeq 95 dB has been used to represent rooftop ventilation (if required).

Operational scenarios were developed to assess worst-case 15 minutes for the morning shoulder, day, evening and night periods. The predicted impacts are listed within the NVIA, with results for each assessment location during each period. It results highlight operational noise predictions comply with intrusive noise levels at all locations within the NCA1 and NCA2. An exceedance of 2 dB of the morning shoulder period intrusive noise level is predicted at R24. This exceedance would be considered negligible and unlikely to be discernible by the average listener.

Sleep disturbance impact was also assessed based on the airbrake release on the hard stand area. The results demonstrate no exceedance of sleep disturbance criteria is predicted.

Assessment of road traffic noise generated by additional traffic movements was also assessed. Road noise modelling has been completed to quantify potential increases in road traffic noise due to site generated traffic when compared against the natural growth of traffic volumes in the absence of the development. Additional road traffic movements on Luddenham Road will be generated by the development. Background traffic data has been sourced from Arcadis for this assessment. The results indicate increases in road traffic noise along Luddenham Road due to site generated traffic is not predicted to exceed the 2dB requirement of the RNP. Cumulative road traffic noise generated by the AIBP has been assessed in the masterplan noise impact assessment. The Masterplan assessment demonstrates existing traffic noise levels exceed the RNP planning levels for assessment locations on Luddenham Road. An exceedance of the 2 dB relative increase criteria is predicted for traffic on Luddenham Road north of Patons Lane at assessment location R1.

Cumulative Operational Impacts

Noise predictions from the site are the same or lower than the masterplan assessment for all assessment locations within NCA1, NCA2 and R15. Predicted noise impacts are up to 4 dB higher than the masterplan assessment for NCA3. While there is an increase in predicted noise impact for NCA3 (R24), amenity levels at this location for the entire masterplan remain in compliance with noise targets.

Vibration

Minimum working distances for typical items of vibration intensive plant that might be used during construction are identified within the NVIA. However, as the nearest assessment location is over 250m from the site boundary and 350m from the proposed façade of the warehouse, the nearest receiver is significantly beyond the recommended safe working distance for cosmetic damage or human comfort. Therefore, construction and operation at the site are not anticipated to generate significant vibration impacts at any assessment location.

6.8.3. Mitigation Measures

Noise mitigation and management measures were identified to address construction and operational phases of the development. These measures will be applied to the proposed development where practical and feasible.

Construction

In accordance with the ICNG, where noise is predicted to exceed NMLs, reasonable and feasible mitigation measure should be implemented to minimise impacts. This includes:

- Work practices:
 - regular reinforcement (such as at toolbox talks) of the need to minimise noise and vibration
 - regular identification of noisy activities and adoption of improvement techniques
 - avoiding the use of portable radios, public address systems or other methods of site communication that may unnecessarily impact upon nearby residents
 - develop routes for the delivery of materials and parking of vehicles to minimise noise
 - where possible, avoid the use of equipment that generates impulsive noise
 - minimise the movement of materials and plant and unnecessary metal-on-metal contact
 - schedule respite periods for intensive works as determined through consultation with potentially affected neighbours (e.g. a daily respite period for a minimum of one hour at midday).
- Plant and equipment:
 - where possible, choose quieter plant and equipment based on the optimal power and size to most efficiently perform the required tasks
 - movement alarms and beepers to be replaced with non-tonal level varying quackers or equivalent
 - operate plant and equipment in the quietest and most efficient manner

- regularly inspect and maintain plant and equipment to minimise noise and vibration level increases, to ensure that all noise and vibration reduction devices are operating effectively.

Operation

The site presents limited opportunities to apply mitigation measures to the south-west of the site, particularly for heavy vehicles travelling around the warehouse. To minimise operational noise levels, particularly when operating on the hardstand areas, the following strategies may be adopted where practicable.

- minimising vehicle movements, particularly during the night period
- not leaving trucks to idle on the hard stand area
- avoiding impact noise from loading materials or air brake release
- operate with roller doors down when not loading or unloading trucks.

6.9. WATER MANAGEMENT

An Integrated Water Cycle Management (IWCM) Report (**Appendix Z**) has been prepared by Henry & Hymas to detail the proposed drainage design and its compliance with relevant requirements to ensure no adverse downstream impacts.

6.9.1. Existing Environment

The site is located at the western portion of the broader AIBP site. The site falls towards the north and falls within the North-West Catchment of the AIBP. The site is located within the Wianamatta – South Creek Catchment area.

The minor storm event for this development is the 1:20yr ARI storm and the major storm event is the 1:100yr ARI storm as per Council's development control plan (DCP). The existing site conditions are predominately pervious in the form of agricultural farmland, consisting of a rectangular network of fenced yards for horse and sheep agistment.

6.9.2. Potential Impacts

The proposed stormwater network has been designed to safely convey minor storm events via a pit and pipe stormwater system with provision for larger, less frequent storm event overland via an overland flow route. To prevent negative impacts on downstream ecosystems and waterways, stormwater from the site is proposed to be managed through the implementation of water quality system, detention and sediment and erosion control. The design of on lot on-site detention will comply with the assumptions outlined in the IWCM Report prepared for DA24/0294.

The key water management issues are described in the following subsections.

6.9.2.1. Stormwater Quantity

The increased impervious surfaces associated with the development will increase peak stormwater flows from the site during storm events. On-site Stormwater Detention (OSD) is proposed to ensure that runoff from the development is appropriately managed in accordance with Council's requirements for the 20 and 100yr ARI storm events. The site stormwater system has been designed to safely convey the flows through the site and within the capacity of the downstream system, as described below:

- **Western Catchment:** Flows from the Western Catchment will be reduced via an underground tank with 1600m³ of detention storage and two orifice plates (with a 250mm openings and a 390mm opening). The proposed development meets Council's stormwater detention requirements as shown by the following post developed flows reduction values:
 - 20year ARI storm: 0.012m³/s reduction.
 - 100year ARI storm: 0.045m³/s reduction.

A portion of Pad 4b and Pad 4c, located south of the site, is proposed to drain through the site as part of the civil design of the overall Alspec Industrial Business Park Precinct. A stormwater easement containing a 750mm diameter pipe is proposed as part of the works to cater for these upstream catchments.

- **Eastern Catchment:** Flows from the Western Catchment will be reduced via an underground tank with 2550m³ of detention storage and two orifice plates (with a 435mm opening and a 390mm opening). The proposed development meets Council's stormwater detention requirements as shown by the following post developed flows reduction values:
 - 20year ARI storm: 0.015m³/s reduction.
 - 100year ARI storm: 0.029m³/s reduction.

6.9.2.2. Water Quality

Council requires stormwater be treated before discharging from the site. Targets are outlined to be satisfied in order to meet Council's requirements. These targets have been met as part of the downstream infrastructure proposed under the bulk earthworks DA (DA24/0294). This involves a CDS 2028 gross pollutant trap and a 7000m² end of line bio-retention basin to treat all stormwater runoff in the Northwestern Catchment of the AIBP.

In addition, the proposed development satisfies Council's 80% non-potable demand to be provided through rainwater or stormwater harvesting storages. This is achieved through 80kL rainwater storage tanks.

6.9.3. Mitigation Measures

Effective stormwater management is achieved through the implementation of the following strategies:

- To manage increase in stormwater flows, OSD is proposed to appropriately manage runoff. This involves the inclusion of underground tanks in each sub catchment of the site.
- To prevent increase of contaminants in stormwater runoff, water quality measures at source and end of line treatments will be provided. To protect downstream water quality, downstream infrastructure has been incorporated into the broader AIBP bulk earthworks design (under DA24/0294).

6.10. FLOOD RISK

A Flooding Risk Letter (**Appendix V**) has been prepared by Arcadis to review the potential flooding impacts associated with the proposed development. The letter draws on the findings contained in the approved flood assessment report for the Bulk Earthworks local DA.

6.10.1. Existing Environment

The letter details the site is elevated above the Probable Maximum Flood (PMF) level associated with South Creek and the unnamed watercourse to the west. The site is also not impacted by inundation from the 1% AEP event and remains flood-free for events up to and including the PMF.

6.10.2. Potential Impacts

The proposed development will not adversely impact existing flood behaviour and no significant regional flood risks exist within the proposed development footprint. Whilst there is no significant regional flood risks identified, internal drainage infrastructure and site grading remain critical to ensuring effective management of local runoff and avoiding localised ponding within the site.

Climate Change impacts were considered in terms of flood risk conditions. The flood modelling confirms flood-free conditions will be maintained for the site even under climate adjusted scenarios, and critical evacuation routes remain accessible.

Overall, the flood assessment confirms the proposed developments compliance with flood-related planning controls and guidelines. As the development is flood free, incorporates flood risk measures and maintains safe, trafficable access and egress routes under regional flooding scenarios; the development creates negligible flood risk.

6.10.3. Mitigation Measures

A range of measures and procedures have been implemented into the proposed development to manage potential flood impacts.

Design Solutions

- **Integrated Stormwater Management:** The civil design incorporates internal stormwater drainage and on-site detention systems to mitigate any increase in downstream flow rates and volumes, preserving pre-development flow characteristics.
- **Ground Level Design:** The proposed pad levels are consistent with the bulk earthworks strategy endorsed in the approved flood assessment. These levels ensure overland flow routes are preserved, and no adverse redirection or concentration of flow occurs.

Operational Procedures

- **Evacuation and Access:** Egress from the site via Luddenham Road remains trafficable during PMF conditions in the southbound direction towards Western Sydney Airport. It is recommended that flood evacuation planning also consider local drainage limitations that could affect access or egress under certain conditions. It is recommended the site be safely evacuated ahead of forecast flooding, due to uncertainties beyond the site's immediate flood-free evacuation path.
- **Flood Emergency Response:** Operational protocols should include early warning systems, proactive site shutdown procedures, and coordination with regional emergency services.

6.11. SOCIAL IMPACT

A Social Impact Assessment (SIA) (**Appendix EE**) has been prepared by EMM in accordance with the Social Impact Assessment Guidelines for State Significant Projects. It provides a review of the local context and community profile in order to inform the potential positive or negative impacts generated by the proposed development.

6.11.1. Existing Environment

The social locality (SIA study area) identifies the social and geographical boundaries for the SIA. These geographical areas include stakeholders who could potentially have an interest in or be directly or indirectly affected by the proposed development. The proposed development considers the local area of Orchard Hills Suburbs and Localities (SAL) (ABS data) as it is likely to contain stakeholders that would experience direct impacts.

A community profile was prepared to describe the community and area. The local area is Orchard Hills SAL. In 2021, the local area had a residential population of 1,798 people, which decreased by 4.2% from 1,877 people in 2016. The local area is characterised by an older population, with a median age of 47 years. Penrith LGA is the regional area and had a population of 217,664 people in 2021. It is characterised by a relatively younger population, with a median age of 35 years compared to NSW's 39 years.

Key social trends and baseline statistics were also analysed as part of the SIA. They have been summarised below.

- **Population Demographics:**
 - According to the 2021 ABS Census, the population of Orchard Hills SAL was 1,798 people. The regional area experienced the highest population growth by 11.0% between 2016 and 2021.
 - From 2014-2024, over this 10-year period, Penrith saw a greater growth in population compared to NSW. In 2021-2022, Penrith experienced its lowest population growth since 2010 of 0.7%, however this was also a trend statewide, with NSW growing by 0.8%.
- **Community Challenges and Values:**
 - Council's Community Strategic Plan outlines the issues and challenges faced by residents of Penrith LGA. It noted the need to meet demands of population growth in terms of services and infrastructure such as housing, transport, schools, healthcare as well as leisure and recreational opportunities.
- **Housing Indicators:**
 - Orchard Hills SAL has a very high proportion of separate houses as the prominent dwelling type in comparison to Penrith LGA (96.8% compared to 78.3%). Orchard Hills also has a higher proportion of dwellings owned outright or with a mortgage than rented.
- **Labour Force Indicators:**

- Orchard Hills SAL has a lower labour force participation rate than Penrith LGA (59.3% and 62.4%, respectively). However, Orchard Hills had a lower unemployment rate (3.3%) and youth unemployment rate (8.0%) than Penrith LGA (4.6% and 9.1%, respectively).
- The top three industries of employment in Orchard Hills are construction (19.7%), retail trade (9.7%), and education and training (9.1%). For Penrith LGA, the top three industries of employment include health care and social assistance (13.2%), construction (12.0%), and retail trade (10.0%).
- Local Business and Industry:
 - The most prevalent industry of registered businesses was construction (389 businesses or 28.0% of total businesses). This was followed by rental, hiring and real estate services (188 businesses or 13.5% of total businesses) and transport, postal and warehousing (171 businesses or 12.3%).
- Socio-economic Indicators:
 - There is a moderate proportion of the population which exhibit moderate characteristics associated with both relative socio-economic advantage and disadvantage. The index of Economic Resources (IER) indicates the area has greater access to economic resources, such as high incomes. Trends in Orchard Hills are aligned with those in the regional area.
- Community Needs:
 - Orchard Hills has limited access to public transport options compared to Penrith city centre. It has five bus routes that border the suburb by stopping on the Northern Road or Mamre Road, and one bus route that runs through the suburb. There is currently no train station in Orchard Hills, with the closest one being Kingswood Station, less than 2 km away. However, there is plans for an Orchard Hills train station as part of the Sydney Metro – Western Sydney Airport metro railway line.

6.11.2. Potential Impacts

Identification and assessment of relevant social impacts was undertaken with consideration of the associated impact categories outlined in the SIA Guideline 2023 (DPHI, 2023a) which refers to potential changes to people's:

- Way of life
- Community
- Accessibility
- Culture
- Health and wellbeing
- Surroundings
- Livelihoods

A summary of the identified social impacts are provided in the following table.

Table 24 Identified Social Impacts and Benefits

Impact / Benefit	Category and stage	Unmitigated Significance
Local character change (negative)	Community Construction: Medium Operation: Low	Medium
Diminished visual amenity for surrounding residents and businesses (negative)	Surroundings Construction: Medium Operation: Medium	Medium
Concerns regarding deterioration of amenity due to generation of noise and changes to air quality (negative)	Health and wellbeing Construction: Medium Operation: Low	Medium
Changes to traffic and access (negative)	Accessibility Construction: Low Operation: Low	Low

Impact / Benefit	Category and stage	Unmitigated Significance
Economic benefits from employment during Project construction (positive)	Livelihoods Construction: Medium	Medium
Increased economic benefits from employment during Project operation (positive)	Livelihoods Operation: Medium	Medium
Increased economic benefits during project operation due to additional warehousing capability	Livelihoods Operation: Low	Low

Overall, the project will deliver various positive impacts for the local community by increasing resource storage and distribution as well as developing warehouse infrastructure in alignment with the regional planning priorities. The development will create employment and economic benefits for the community, with the proposed warehousing development supporting economic growth.

Consideration to maintaining amenity with minimal impact to the environment is a concern and impact to be managed. This concern relates to the construction period as well as operation. Without mitigation and management, amenity impacts could affect neighbourhood identity as well as the health and wellbeing of nearby residents due to changes to the surrounding landscape and environment. The proposed development is expected to be able to manage these impacts within the parameters set by local controls, and ongoing opportunities for the community to engage with the proposal.

Through the implementation of the recommended mitigation measures, the proposed development will appropriately manage potential negative social impacts.

6.11.3. Mitigation Measures

Identification of measures which will be implemented where necessary to avoid or reduce the significance of impacts and enhance Project related benefits are summarised below.

- Community:
 - Demonstrate project alignment with local and regional plans and policies.
 - Deliver continued effective communication to set community expectations for the changing character of the site and surrounds.
 - Promotion of alternate travel options for local workers
- Surroundings:
 - Utilising design principles to soften visual impacts, including provision of visual screening and landscaped setbacks from Luddenham Road and Patons Lane, in alignment with local planning controls.
 - Continued updates to neighbouring landholders.
 - Implementation of a Construction Management Plan.
- Health and Wellbeing:
 - Implementation of a Construction Management Plan.
 - Minimise and control noise, and air pollution by applying reduction methods in alignment with relevant guidelines.
 - Establish a publicly available complaints management process including site signage and a feedback mechanism to support strong community relations.
- Access:
 - Signage and notifications for local road users regarding potential traffic congestion.
 - Alignment of future development of the site with proposed Luddenham Road upgrades.

- Preparation of a Construction Traffic Management Plan to address traffic management requirements, including site signage and establishment of temporary parking zones.
- Establish a publicly available complaints management process including site signage and a feedback mechanism to support strong community relations.

6.12. OTHER IMPACTS NOT REQUIRING DETAILED ASSESSMENT

This section of the report addresses the matters which require a standard impact assessment. It outlines the findings of the assessment and the key mitigation measures used to ensure compliance with the relevant standards or performance measures.

6.12.1. Ecologically Sustainable Development

A Sustainability Report (**Appendix GG**) has been prepared by Northrop to assess the proposed development's approach to sustainability. The report provides an overview of the proposed ecologically sustainable development (ESD) principles and how they have been implemented throughout the design, construction, and operation phases.

The project has integrated initiatives aligned with the Green Building Council of Australia (GBCA), which provide a benchmark for industry best practice. These measures are outlined in the following section as mitigation measures.

In addition, the sustainability report details the range of resource efficiency measures being implemented within the design. These include substantial energy, water, and material efficiency, water sensitive design and waste management measures. This has been detailed in **Section 3.6.4** of this EIS.

Overall, the report demonstrates the proposed development effectively minimises greenhouse gas emissions and adopts practical and effective sustainability initiatives. Accordingly, the Sustainability Report outlines the proposed development demonstrates a strong commitment to the ESD principles.

6.12.1.1. Mitigation Measures

The following measures have been incorporated into the proposed storage and distribution warehouse to demonstrate the projects ability to uphold best practice in line with elements drawn from the GBCA.

- Management: Promotes the adoption of environmental principals throughout the inception, design, construction and operations of the proposed development. Initiatives include:
 - Provision of detailed operations and maintenance information to support ongoing operations.
 - Metering of the main building elements to support reporting and optimisation of the project systems.
- Indoor Environment Quality: Enhance the comfort and wellbeing of building occupants.
 - Building services noise levels to be managed to achieve acoustically comfortable spaces.
 - Low irritant materials and coatings to be used.
 - LED lighting to meet illuminance, uniformity and glare requirements in applicable areas.
 - A mechanical system that promotes good thermal comfort in the conditioned spaces.
- Energy: Reducing energy consumption and greenhouse gas emissions.
 - Inclusion of solar arrays.
 - Incorporation of an efficient heating and cooling system.
 - Building fabrics that exceed the requirements of the construction code.
- Transport: promotes provisions for reduced greenhouse gas emissions arising from occupant travel to and from the site.
 - Provision of end-of-trip facilities to promote the use of alternative modes of transportation.
 - Provision of electric vehicle charging that will reduce emissions, promote resource efficiency, decrease noise pollution, and enhances energy independence.

- Implementation of a GTP to promote healthier lifestyles by encouraging walking, cycling, and the use of public transportation
- Water: reduce the amount of potable water consumed on-site.
 - Inclusion of highly efficient fixtures and fittings.
 - Rainwater collection and reuse.
- Materials: reducing the consumption of resources through selection and reuse of products.
 - The use of paints, adhesives, sealants, and carpets are low in TVOC or non-toxic.
 - The use of low TVOC or non-toxic engineered wood products.
- Emissions: targets building emissions relating to watercourse pollution, light pollution, ozone depletion and global warming.
 - All thermal insulants in the project will aim to avoid the use of ozone depleting substances in both their manufacture and composition.
 - To reduce light pollution, no direct light generated inside or outside the building will face directly upward into the sky.
 - Protection of local waterways, and the impacts of flooding and drought.

6.12.2. Ground and Water Conditions

A Groundwater Impact Assessment (**Appendix X**) has been prepared by Ecological Australia to investigate the groundwater conditions and potential groundwater impacts.

Regionally, groundwater level was extracted from the BoM Australian Groundwater Explorer online database using data from 370 registered bores within a 10 km radius of the site. It highlights regional groundwater levels are variable, extending from 7.2 to 58.6m AHD, and largely reflect the surface topography. The data variability and proximity of bores does not enable accurate extrapolation of groundwater levels at the site.

Geotechnical staff recorded groundwater depths during site visit 24th June 2024 of:

- Drill hole BH01 groundwater depth of 2.24 m bgl (36.2 m AHD).
- Drill hole BH02 groundwater depth of 3.2 m bgl (42.9 m AHD).
- Drill hole BH03 groundwater depth of 2.31 m bgl (44.8 m AHD).

Groundwater Dependent Ecosystems (GDEs) were reviewed as part of the assessment. At the northwest portion of the AIBP site, an area of Cumberland River Flat Forrest is identified as a high potential Terrestrial GDE. This is located outside the area of the proposed development.

The assessment collates a range of potential groundwater impacts and provides a preliminary risk assessment. This has been summarised in the following table.

Table 25 Potential Groundwater Impacts

Potential Receptor	Potential Exposure Pathway/Impact	Preliminary Risk Assessment
Third party bore users.	Human, livestock and/or domestic source users of impacted groundwater resulting in illness or death.	Low – unlikely, considering the status of local groundwater and limited current groundwater use. Management strategies include monitoring to ensure no impacts and mitigation through replacement volumes if necessary.
Terrestrial GDEs along the streamlines.	Deterioration in the health of GDE communities due to reduction in groundwater levels or quality.	Low to moderate – the alluvial groundwater observations represent localised waterlogging of clay, rather than extensive shallow groundwater lenses, with proximity of Terrestrial GDEs only along the Unnamed creek within the northwest of the AIBP, there is a slight potential for contamination of source waters. Management strategies

Potential Receptor	Potential Exposure Pathway/Impact	Preliminary Risk Assessment
		will include water quality monitoring to ensure no changes to local water quality conditions.
Water Table	Reduction in water table level due to changes in connected surface water flows, infiltration rates or water take.	Low – natural recharge due to local infiltration is likely to be minor across the site due to high clay contents of soils. Dewatering will be limited to localised waterlogging of clay and constitute small volumes. Treated stormwater will be directed to existing drainage where possible to limit changes in stream bed infiltration.
Water Pressure	Reduction in the water pressure due to changes in connected surface water flows, infiltration rates or water take.	Low – lack of connectivity across the site mitigates against changes to groundwater pressures. Treated stormwater will be directed to existing drainage where possible to limit changes in stream bed infiltration.
Water Quality	Reduction in the water quality due to changes in connected surface water flows, infiltration rates, water take or leaching of saline soils.	Moderate – due to proximity to Terrestrial GDEs along the Unnamed creek within the northwest of the AIBP. Management strategies will include water quality monitoring.

The assessment confirms the risks and potential impacts to groundwater quantity and aquatic GDEs are low. Potential risks and impacts to groundwater quality is also assessed to be low. This is with the exception of the proximity to Terrestrial GDEs along the unnamed creek to the northwest of the site, which is assessed as moderate.

The localised occurrence of relatively high salinity pools, dense vegetation and presence of large eucalypts strongly supports a dependence on groundwater for this riparian zone for at least part of the year. The restricted extent of the hydrogeological landscape, also suggests that this zone is isolated from the rest of the site, which sits on the Upper South Creek hydrogeological landscape and management of the riparian zone through the Vegetation Management Plan (VMP) will provide adequate protection of this GDE.

6.12.2.1. Mitigation Measures

The following mitigation measures have been identified by Ecological Australia to ensure impacts and risks to groundwater conditions are managed. They will be adopted where required, and include:

- Impacts to groundwater levels:
 - Monitor for groundwater during site excavations, with specific focus on geotechnical investigation sites BH03 & TP47.
 - Potential impacts at geotechnical investigation sites BH03 & TP47 to be managed through site-specific CEMP.
- Impacts to groundwater quality:
 - Management of temporary sewage systems established onsite for the duration of the Project also pose a risk to surface water quality should spills occur.
 - It is important that Industry Standard spill minimisation and response procedures are followed, which will reduce and minimize any potential groundwater contamination during construction.
- Impacts to groundwater dependent ecosystems:
 - Monitor for shallow groundwater presence during site excavations within the northwest portion of site, due to potential impact to the Cumberland Riverflat Forest Terrestrial GDE. Potential impacts to be managed through site-specific CEMP and VMP.
- Water balance consideration:
 - Select native grasses that are commonly utilised for rain gardens and biofiltration beds as they are commonly deep-rooting and have tolerance for extreme wet/dry climates.

6.12.3. Hazards and Risks

A State Environmental Planning Policy – Resilience and Hazards Assessment (**Appendix R**) has been prepared by Riskcon Engineering Pty Ltd to provide an assessment of any potential risks to the surrounding or sensitive land uses.

The proposed development involves the storage of dangerous goods, as described in Section 3.11.2 of this EIS. As such, this assessment is required to confirm if the development is deemed potentially hazardous in accordance with the R&H SEPP.

Storage threshold limits are identified under the R&H SEPP. Based on the location of the Class 3 DGs, there is more than 30 m clearance to the nearest site boundary. A review of the remainder of the warehouse indicated that the closest the exterior of the warehouse is to the site boundary is 13.2 m, however this is an auxiliary part of the warehouse and will not contain any DGs. Based on this assessment, the development is not potentially hazardous on the basis of the quantity and location of Dangerous Goods stored.

In addition, a transport screening threshold assessment is performed to determine if excessive risk is present due to a high number of DG-associated vehicle movements. Based on the vehicle movement thresholds for Class 3 PG III DGs, it is highly unlikely that the site will exceed these and be considered potentially hazardous. Therefore, the proposed development is not potentially hazardous on the basis of vehicle movements.

Lastly, the potential for offence was evaluated, and it was determined that the proposed development would not cause offence to the surrounding area.

Overall, the review of dangerous goods (DG) quantities and storage locations determined that the SEPP-RH regulations do not apply. Notwithstanding, the assessment has identified several recommendations to ensure ongoing safety and compliance with standards of DGs.

6.12.3.1. Mitigation Measures

The proposed development does not require a Preliminary Hazard Analysis (PHA). However, due to the storage of Dangerous Goods, the following recommendations will be adopted where necessary:

- Design the warehouse in accordance with relevant Australian Dangerous Goods Standards (AS 1940, AS 2118) and FM Global Standards where appropriate.
- Reassess the site if there are significant changes in the class, quantity, or location of Dangerous Goods.

6.12.4. Contamination and Remediation

A Contamination Report (**Appendix Q**) has been prepared by Development Risk Management (DRM) to investigate the potential for contamination at the site.

Construction Sciences completed numerous contamination assessments across the property which identified asbestos and other chemical contamination across the site. DRM were later engaged in 2024 to conduct validation of the remediation to complete the final validation report for the property. All assessment and remediation work conducted by Construction Sciences were discussed and a final validation report was prepared by DRM.

DRM have prepared a Final Validation Report to demonstrate the identified contamination at the site has been satisfactorily remediated and considered suitable for the proposed development. The report confirms the property can be made suitable for the proposed industrial land use, as long as further assessment and remediation of asbestos impacted soils in the central portion of the Outer Sydney Orbital corridor. In addition, if required, assessment and remediation within the areas currently leased by Sydney Metro and Endeavour Energy, at the completion of lease periods.

6.12.4.1. Mitigation Measures

The DRM conclusions and previous assessments does not preclude the potential for isolated hotspots of unexpected contamination to be encountered during earthworks. If such isolated pockets of unexpected contamination are encountered during construction works, DRM recommends it be managed in accordance with the Unexpected Finds Protocol.

6.12.5. Waste Management

A Waste Management Plan (WMP) (**Appendix KK**) has been prepared by Arcadis to detail the potential waste generating activities associated with the proposed development and identify relevant mitigation measures to manage waste.

Construction Waste

Waste generation and management relating to demolition or site preparation works for the proposed development has been addressed in the bulk earthworks DA (DA24/0294). Notwithstanding, construction waste management has been assessed by Arcadis. This begun with estimating the construction waste quantities generated by the proposed development using waste generation rates. The quantities for each relevant stream were identified along with a recommended management approach.

Construction waste generated on site will be stored in bins by material type. Bins will largely constitute skip bins of a range of sizes, and for smaller waste streams 240L Mobile Garbage Bins (MGBs) will be provided. Special and problem wastes (such as liquids and hazardous wastes) will not be disposed of via skip bins and will be managed separately in accordance with the waste type and legislative requirements.

The north-east site corner is the indicative location for construction waste storage. This will be confirmed by the construction management team upon the commencement of construction works. Bins will be clearly marked in accordance with the contents and be positioned in an area that is easily accessible for collection vehicles, away from stormwater drainage infrastructure, clear of overhead obstacles, and covered when not in use to avoid the risk of creating windblown litter. A waste contractor will be engaged to perform waste collection services at the site throughout the demolition and construction stages. Vehicle access to the waste storage area will be via the Site Access Road via a temporary driveway on Patons Lane.

Operational Waste

Waste generation rates have been adopted from Council's DCP for estimating the type and quantities of waste generated by operational activities. The estimated quantities of operational waste generated by the Storage and Distribution development is provided in the following table.

Table 26 Estimated Generated Waste and Recycling Volumes

Land Use	Floorspace (m2)	General Waste (L/day)	Recycling (L/day)	General Waste (L/week)	Recycling (L/week)
Warehouse	43,606	4,361	4,361	30,527	30,527
Office	1,843	184	184	1,288	1,288
Total		4,545	4,545	31,815	31,815

It is noted operational waste is generally limited to garbage, paper/carboard and other recycling. Small quantities of e-waste, toner cartridges, and problem waste are expected to be generated in the office spaces. This waste should be managed and stored within the bulky waste storage area in the warehouse, with monitoring in place for the collection and removal of these wastes once sufficient volumes have been generated.

The proposed waste storage area requires a minimum of 49m² in area. This is based of the estimated quantities of operational waste generated by the proposed development. This area has been identified to be located at the southern side of the proposed warehouse.

A suitably licensed and qualified private waste contractor will be engaged to collect waste generated during the standard operations of the site. Waste vehicles would enter the site from the truck entry driveway near the southern boundary on the Internal Access Road. Waste vehicles will travel west along the hardstand, past the 12-space on grade dock area. The waste compactor zone will then be to the right, at the southern section of the hardstand. The waste collection vehicle will have adequate space to be able to perform in and out turning movements at waste area for collection. To exit, waste vehicles must continue travelling clockwise around the hardstand to reach the truck exit driveway near the northern site boundary. Waste vehicles will be placed back onto the Internal Access Road, allowing them to depart from the AIBP. This servicing and access arrangement enables all waste collection activities to occur fully within the confines of the site, in the designated area.

6.12.5.1. Mitigation Measures

The proposed mitigation measures were identified to be incorporated into the proposed development.

- This WMP will be retained on-site during the demolition, excavation and construction phases of the development, along with other waste management documentation (e.g. contracts with waste service providers).
- All demolition and construction waste generated on site will be stored in bins by material type.
- Maximising the re-use and recycling of existing materials as part of material section. Practices that can be adopted to achieve this target include:
 - Maximising the re-use and recycling of existing materials as part of material section.
 - Planning deliveries to ensure the right quantity of materials is provided at the right time in the construction process to avoid damage and wastage, and returning unused materials.
 - Considering the full lifecycle of the development in planning for the re-use and recycling of materials
- A waste compactor area is provided, as shown along the hardstand of the storage and distribution facility site plans.

6.12.6. Aboriginal Cultural Heritage

An Aboriginal Heritage Advice Letter (**Appendix G**) has been prepared by EMM Consulting to address any impacts to potential Aboriginal cultural heritage sites or values within the site. The letter reinforces the previous Aboriginal Cultural Heritage Assessment (ACHA) undertaken for the Bulk Earthworks DA (DA24/0294). As part of the ACHA, an Aboriginal Heritage Impact Permit (AHIP) was requested following the approval of the bulk earthworks DA. The broader AIBP site would undergo Aboriginal heritage management, in which the management of all identified cultural materials would be managed and mitigated as part of the bulk earthworks DA and would be completed prior to any subsequent SSD development and an archaeological recovery of significant cultural deposits.

Subsequently, there should be no outstanding Aboriginal heritage requirements for the site and the proposed development can proceed.

6.12.7. Environmental Heritage

A Historical Letter of Advice (**Appendix Y**) has been prepared by EMM Consulting to identify the historical heritage constraints present on site. The assessment seeks to confirm if there will be potential, adverse impacts to any present historical heritage.

The advice identifies six heritage listed properties within 3km of the project area. Two of these are directly adjacent to the site, and are listed in the Penrith LEP 2012 as being of local significance. These include:

- “Luddenham Road Alignment” (PLEP 2010, I843)
- “Leholme Horse Stud Rotunda” (PLEP2010, I232)

Moreover, EMM Consulting previously completed a historical heritage assessment and statement of heritage impact in 2023. It conveys the project area has a continuous history of rural and economic development which contributes to the rural character of Luddenham Road and is representative of the long occupied rural estates in the Penrith region.

The report established through background research and a subsequent site survey that there are no items of built heritage significance within the project area. Overall, the report established through background research and a subsequent site survey that there are no items of built heritage significance within the project area.

The assessments under the Bulk Earthworks DA concluded that no direct impacts have been identified as arising from the bulk earthworks. Therefore, the construction of the proposed development is likewise expected to have no significant heritage impacts. As no heritage constraints were identified, there is no need to revisit these assessments as it is unlikely that new findings will be identified.

6.12.7.1. Mitigation Measures

It is recommended to incorporate all management measures and project obligations into an Historical Heritage Management Plan that outlines the specified requirements including an unexpected finds protocol methodology.

6.12.8. Infrastructure Requirements and Utilities

Arcadis were engaged to prepare an Infrastructure and Utilities Plan (**Appendix II**) for the proposed development. This cover letter details the previously prepared site-wide Utility Servicing Report for the Bulk Earthworks DA (DA24/0294) adequately addresses the requirements for this application.

The Utilities and Servicing Report prepared by Arcadis in 2024 identifies the existing utility infrastructure available to the AIBP as well as the network capacity and augmentation requirements to support the future construction of the industrial business park.

The report identifies the following existing utility services at the site:

- Potable Water: Sydney Water Corporation (SWC) have confirmed that there are works underway in the area that once completed will provide enough water capacity to service the development.
- Wastewater: Wastewater will be serviced privately through an onsite sewer management (OSSM) facility. As the OSSM is privately operated, Sydney Water have confirmed that they have no objections to the use of the facility. The proposed OSSM is a Blackwater Treatment Plant designed by Aquacell Pty Ltd.
- Electrical: HV lead in works from the substation at Mamre road to the development have been approved by Endeavour Energy. A separate application will be submitted for the internal reticulation and street lighting.
- Gas: At this stage, it is not proposed to supply the development with reticulated gas and has therefore been excluded from this report.
- Data and Telecommunications: Telstra and NBN Co. have assets in the vicinity of the site along Patons Lane and Luddenham Road and it is proposed that the developer connects into the existing infrastructure.

6.12.9. Bushfire Risk

A Bushfire Assessment (**Appendix N**) has been prepared by Peterson Bushfire to demonstrate the proposed developments compliance with relevant bushfire legislation including *Planning for Bush Fire Protection 2019 (PBP)*.

The site is mapped as bushfire prone land vegetation category 3, as is the broader AIBP site. A bushfire hazard assessment was completed to determine the applicable bushfire protection measures. A summary of the bushfire hazard assessment is detailed below:

- Predominant vegetation: the bushfire hazard is primarily grassland adjoining the western boundary of the AIBP and woodland to the south-west. The areas to the north, east and south of the site will be cleared and modified as part of other development applications for the AIBP.
- Effective slope: The effective slope class underneath the identified hazards is 'downslope 0-5 degrees'.

An assessment against the planning for Bushfire requirements was undertaken, specifically the aims and objectives of the PBP and the four specific objectives for buildings Class 5-8. The objectives have been complied with through the implementation of the recommendations provided by Peterson Bushfire. They have been listed in the following section.

6.12.9.1. Mitigation Measures

The Bushfire Assessment has confirmed the proposed development will comply with the PBP through the adoption of the following measures:

- With the exception of landscape screening along boundary locations, the subject land is to be maintained to achieve the performance requirement of an Inner Protection Area (IPA) as described by Appendix 4 of PBP. The following landscaping specifications have been designed to achieve the IPA at this site:
 - Trees at maturity should not touch or be within 2 m of the building;

- Tree canopies should be separated by a minimum of 2 m;
 - Ensure gaps in the vegetation, such as between garden beds, to prevent the spread of fire towards the building;
 - Landscaping should be separated from the building by at least 1 m;
 - Grass should be kept mown (as a guide grass should be kept to no more than 100mm in height); and
 - Leaves and vegetation debris should be regularly removed.
- Fire hydrants are to be installed to comply with AS 2419.1 – 2021 Fire Hydrant Installations - System Design, Installation and Commissioning (AS 2419).
 - Gas services are to be installed and maintained in accordance with AS/NZS 1596-2014 The storage and handling of LP gas.

7. JUSTIFICATION OF THE PROJECT

This section of the report provides a comprehensive evaluation of the project having regard to its economic, environmental and social impacts, including the principles of ecologically sustainable development. It assesses the potential benefits and impacts of the proposed development, considering the interaction between the findings in the detailed assessments and the compliance of the proposal within the relevant controls and policies.

7.1. PROJECT DESIGN

The vision for the project is to deliver a high-quality, state-of-the-art storage and distribution warehouse. The proposed Storage and Distribution Warehouse emulates a modern, high-quality industrial facility which will support the establishment of the Alspec Industrial Business Park (AIBP). The AIBP seeks to set a benchmark for warehousing and logistics developments.

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

The project's key objectives include:

- Deliver a high-quality, state-of-the-art storage and distribution warehouse.
- The Alspec Industrial Business Park (AIBP) will become a world-class warehouse and logistics precinct.
- The AIBP unlocks economic opportunities for the area and establishes itself as an industrial and employment hub leveraging its proximity to the Western Sydney Aerotropolis.
- Create a green and cool warehouse that employs landscaping to integrate with the AIBP and surrounding ecological environment.

7.2. STRATEGIC PLANNING CONSISTENCY

The proposal is consistent with the strategic direction and goals set for the site and neighbouring lands under the Penrith LSPS and Penrith ELS. The project also aligns with the wider strategic context set by the Region Plan and District Plan. The proposed development acknowledges and responds to the strategic vision of the site as it will contribute additional industrial floorspace within Western Sydney and in proximity to the WSA to support to growth of the freight and logistics industry in the surrounding area.

Relevant strategic policies have been thoroughly considered as required by the SEARs and detailed in Section 2.5 of this EIS. The site is deemed strategically suitable for the proposed development.

7.3. STATUTORY PLANNING CONSISTENCY

The relevant State and local environmental planning instruments are listed in **Section 4** and assessed in **Appendix C**. The assessment concludes that the proposed development complies with the relevant provisions within the relevant instruments as summarised in **Table 27** below.

Table 27 Statutory Planning Consistency

Matter	Consistency
Objects of Act – EP&A Act s1.3	The proposed development has been assessed and designed in respect to the relevant objects of the EP&A Act and addressed in Appendix C
Evaluation of development application (s4.15) – EP&A Act s4.40	The proposed development has been evaluated in accordance the relevant matters for consideration under s4.15(1) of the EP&A Act as outlined in Appendix C .
Compliance with environmental assessment requirements – EP&A Regulation s.191	This EIS has been all matters identified in the SEARs as outlined in Appendix A .
Principles of Ecologically Sustainable Development – EP&A Regulation s.193	

Matter	Consistency
The precautionary principle	The precautionary principle relates to uncertainty around potential environmental impacts and where a threat of serious or irreversible environmental damage exists, lack of scientific certainty should not be a reason for preventing measures to prevent environmental degradation. The project is committed to incorporating sustainability initiatives to minimise impacts on the environment, as outlined in the sustainability report attached to this EIS (Appendix GG). A commitment to improve on minimum benchmarks demonstrates the development's commitment to sustainability.
Inter-generational equity	Intergenerational equity: the needs of future generations are considered in decision making and that environmental values are maintained or improved for the benefit of future generations. The project is committed to incorporating careful selections into the project design. The design team has addressed energy, potable water, and material consumption to do what is within the project's control to allow each following generation to have an opportunity for ecological equality.
Conservation of biological diversity and ecological integrity	Conservation of biological diversity and ecological integrity: The project is committed to planting native vegetation and using integrated landscaping to enhance the overall ecological and biodiversity of the site. Rainwater and stormwater will be carefully managed and controlled to minimise impacts on surroundings.
Improved valuation, pricing and incentive mechanisms	Improved valuation, pricing and incentive mechanisms: this requires the holistic consideration of environmental resources that may be affected as a result of the development including air, water and the biological realm. It places a high importance on the economic cost to environmental impacts and places a value on waste generation and environmental degradation.

7.4. COMMUNITY VIEWS

Community and stakeholder engagement has been undertaken by the Applicant and Urbis in the preparation of the SSDA. This included direct engagement and consultation with:

- Adjoining landowners and occupants.
- Government, agency, utility services, community groups and other key stakeholders.
- This engagement was consistent with the community participation objects in the Undertaking Engagement Guidelines for State Significant Projects and complied with the community engagement requirements.

Feedback obtained by Government, agencies and utility stakeholders have been incorporated into the design and assessment in the EIS and is available in Section 5. The proponent will continue to keep stakeholders, and the community informed of the project application as the project progresses.

In accordance with the Regulations, the EIS will be placed on formal public exhibition once DPHI has reviewed the EIS and deemed it 'adequate' for this purpose. Following this exhibition period, the applicant will respond to any matters raised by notified parties.

7.5. ENVIRONMENTAL IMPACTS

The proposed development has been assessed considering the potential environmental, economic and social impacts as outlined in the summary table below.

Table 28 Environmental Impact Summary

Matter	Summary
Impacts on the natural environment	▪ The AIBP and proposed site is situated on a largely cleared rural landholding. ▪ The proposed development does not result in any adverse environmental or social impacts to the local amenity. The site is entirely zoned for employment uses and is 'certified – urban capable land' under the Cumberland Plain Conservation Plan. ▪ The proposed development has also been informed by a series of environmental studies to ensure there are no significant impacts on the natural environment. Where potential impacts have been identified recommendations have been made to ensure these can be adequately managed and mitigated. These studies include the detailed assessments of the acoustic, air quality, stormwater management, contamination, hazardous materials, waste and biodiversity impacts. ▪ The implementation of the recommended mitigation measures and proposed management plans will minimise any impacts to the natural environment.
Impacts on the built environment	The project has been prepared to minimise any visual or built form impacts and deliver a positive amenity outcome. ▪ The proposed built form contributes to the industrial land use character of the AIBP, contributes to the streetscape character and responds to the future desired character of the locality. ▪ A high-quality, corporate design outcome is achieved to create a world-class warehouse and logistics precinct. The building accentuates visual interest using façade articulation and use of high-quality materials and finishes. ▪ Perimeter landscaping is proposed to enhance visual amenity using tree planting and vegetation planting. This creates green, vegetated setbacks that filters views to the built form.
Social impacts	The project is consistent and compatible with the sites zoning and future strategic direction as envisioned within the Penrith LSPS. The project will provide additional employment opportunities for the people of Penrith and Western Sydney.
Economic impacts	The proposed development will stimulate positive social impacts and economic benefits as it will create construction and operation jobs.

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

7.6. SUITABILITY OF THE SITE

The site is considered highly suitable for the proposed development for the following reasons:

- The proposed warehouse and distribution estate is permissible in the E4 General Industrial Zone and is consistent with the zone objectives under the Penrith LEP.
- The project is in line with relevant State and local strategic and statutory policies.
- The project has been designed with respect to both the emerging local character and future urban context of Orchard Hills and broader Penrith LGA, giving due consideration to the site-specific constraints and opportunities.
- The project is supported by the necessary infrastructure services with sufficient capacity to ensure the projects operational viability from both a utility, stormwater and traffic perspective.
- The detailed impact assessment conducted for the project demonstrates that the proposed development can proceed without any unacceptable environmental impact that cannot be mitigated through the implementation of specific measures or management plans.

7.7. PUBLIC INTEREST

- The project will deliver a total of 429 operational jobs which will provide immediate direct employment opportunities for Penrith and broader Western Sydney.
- The project aligns with both State and Local strategic plans, demonstrating substantial consistency with all relevant planning controls.
- No anticipated adverse environmental, social, or economic impacts are anticipated which cannot be mitigated or managed.
- A world-class warehouse and logistics estate is envisioned to support the industrial operations of Western Sydney and stimulate economic benefits for the region. The proposed development is considered in the public interest for the following reasons:

Having considered all relevant matters, we conclude that the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

8. CONCLUSION

This EIS has assessed the environmental, social and economic impacts the proposed development at 221-235 Luddenham Road, Orchard Hills. It has addressed the issues identified in the SEARs and prepared in accordance with Part 8 Division 5 of the EP&A Regs.

Having regard for the biophysical, economic and social considerations, including the principles of ecologically sustainable development, the proposed development is justified for these reasons:

- The proposed development will deliver 48,157m² of industrial floorspace and employment facilities within the Penrith LGA which will attract industries and greater job opportunities.
- The proposed development will deliver upon the strategic vision of Penrith and support the growth of the LGA by unlocking warehouse and industrial land uses. This will create a positive impact for Western Sydney.
- The proposed development will establish the Alspeck Industrial Business Park which will contribute significant investment in employment land uses for Penrith by delivering significant employment opportunities for the growing population and residential communities. It is projected to create 429 operational jobs.
- The site's strategic location within Penrith and adjacent to the WSI offers the prospect of jobs closer to home, realising the '30 Minute City' concept outlined in the Greater Sydney Region Plan.

9. DISCLAIMER

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