URBIS

Environmental Risk Assessment and Mitigation Measures

The following section provides recommendation for mitigation measures in response to potential impacts identified in **Section 6** of the EIS. The structure of mitigation measures is based on the DPIE's hierarchy of approaches for managing impacts identified in the *Draft Environmental Impact Assessment Guidance Series* released by DPE in June 2017, as:

- **Performance based measure** – identify performance criteria that must be complied with to achieve an appropriate environmental outcome but do not specify how the outcome is to be achieved.
- **Prescriptive measure** – require action to be taken or specify something that must not be done.
- **Management based measure** – identify one or more management objectives that must be achieved through the implementation of a management plan.

Following the implementation of appropriate mitigation measures as recommended, it is determined that the proposal will not result in any significant adverse impacts on the surrounding environment. The following table illustrates how the matters raised within the SEARs will be addressed.

This analysis comprises a qualitative assessment consistent with AS/NZS ISO 31000:2009 *Risk Management–Principles and Guidelines* (Standards Australia 2009). The level of risk was assessed by considering the potential impacts of the proposed development prior to application of any mitigation or management measures. In accordance with the SEARs, the Environmental Risk Assessment (ERA) addresses the following significant risk issues:

- The adequacy of baseline data;
- The potential cumulative impacts arising from other developments in the vicinity of the site; and
- Measures to avoid, minimise, offset the predicted impacts where necessary involving the preparation of detailed contingency plans for managing any significant risk to the environment.

Risk comprises the likelihood of an event occurring and the consequences of that event. For the proposal, the following descriptors were adopted for 'likelihood' and 'consequence'.

Likelihood		Consequence	
A	Almost certain	1	Widespread and/or irreversible impact
B	Likely	2	Extensive but reversible (within 2 years) impact or irreversible local impact
C	Possible	3	Local, acceptable or reversible impact
D	Unlikely	4	Local, reversible, short term (<3 months) impact
E	Rare	5	Local, reversible, short term (<1 month) impact

The risk levels for likely and potential impacts were derived using the following risk matrix.

		LIKELIHOOD				
		A	**B**	**C**	**D**	**E**
CONSEQUENCE	**1**	High	High	Medium	Low	Very low
	2	High	High	Medium	Low	Very low
	3	Medium	Medium	Medium	Low	Very low
	4	Low	Low	Low	Low	Very low
	5	Very low	Very low	Very low	Very low	Very low

The results of the environmental risk assessment for the proposed development are presented in the below table and are based upon the range of technical and specialist consultant reports appended to the EIS. The table has directly related mitigation measures responding to each impact also based upon the range of technical and specialist consultant reports appended to the EIS.

N.B. **'O' – Operational; 'C' – Construction**

'Pe' – Performance based mitigation measure; 'Pr' – Prescriptive based mitigation measure 'Ma' – Management based mitigation measure

SEARS	Potential Impact	Stage of Project	Likelihood	Consequence	Risk Level	Approach	Mitigation Measure (Pe/Pr/Ma)	Residual Impact
Traffic and Transport	Increased traffic generation and delays in surrounding road network. Insufficient provision of parking.	C & O	C	3	Medium	A preliminary GTP has also been prepared and outlines potential initiatives to encourage sustainable transport choices for the future tenant, including monitoring of mode share targets and periodic review of travel demand management measures. The TIA also includes implementation and monitoring measures to be employed where applicable. These include: ▪ Responsibility for implementation: The Travel Plan Coordinator (TPC) would be responsible for the running of the future GTP, including its administration and all liaison with interested parties. ▪ Travel plan Coordinator: The TPC should be appointed to act as the primary point of contact for enquiries relating to the progress of the future GTP. ▪ Plan Maintenance: Record the overall success, as well as the effectiveness of the individual measures, monitoring and review of the GTP and is to be conducted at regular intervals. ▪ Consultation: It is essential that any parties that may play a part in the future of GTPs and their actions are aware and have an opportunity to discuss. This would enable equitable input and feedback as well maximising their overall efficacy. In addition, a preliminary CTMP has been prepared and provides an overview of anticipated construction traffic impacts, construction vehicle routes, access and parking arrangements and	Pe/Ma	Management of traffic and transport impacts specifically during the construction phase and ongoing during operational.

						measures to manage any construction impacts on other road users.		
Design Quality	Loss of existing visual landscape and local character.	O	C	3	Medium	The proposed development considers the broader context and landscape features in proximity to the site including Badgerys Creek to the west. High quality landscape design is integrated into the site and built form to create a development that positively contributes to the Badgerys Creek Precinct.	Pr	Low risk of residual impact
Built Form and Urban Design	Incompatible built form and urban design.	O	C	3	Medium	The built form and urban design is informed by several inputs including landscape strategies, Aboriginal community engagement and other technical studies to achieve a sympathetic development that celebrates its cultural and landscape setting.	Pr	Low risk of residual impact
Visual	Visual impacts generated by the proposed development in relation to views and visual amenity.	O	D	3	Low	The Visual Impact Assessment (VIA) does not recommend any additional mitigation measures. It notes the importance of the built form and landscape design to managing residual impacts. The visual impacts to the views assessed can be minimised through the successful implementation of the proposed planting design and boundary landscaping. In time, the proposed vegetation and tree planting will filter views to the lower parts of the built form and reduce the assessed level of visual impacts.	Pr	Low risk of residual impact.
Landscaping	Loss of existing trees and vegetation.	C & O	C	3	Medium	A detailed site-specific Tree Protection Plan (TPP) is to be prepared and submitted for approval to the certifier prior to issue of the Construction Certificate. The TPP is to be prepared in accordance with the principles and specifications identified in AS4970 - 2009 Protection of trees on development sites. The	Ma	Low risk of residual impact

						TPP has been included as an appendix within the AIA. To manage the potential impacts, the following mitigation measures were identified to be implemented where feasible. ▪ Trees located on the adjacent property are retained and protected throughout the development as per the Tree Protection Plan. ▪ Any unplanned changes to the grade of the soil within the TPZ of trees to be retained due to landscaping works must be approved by the Project arborist. ▪ Any underground pipes or cabling is to be routed outside the TPZs if possible. The Project Arborist must be informed prior to any further unplanned encroachment within the TPZs. ▪ The area within the tree protection fencing should be mulched with good quality leaf mulch to a depth of 100mm prior to construction to promote better tree health during the construction period. ▪ Ensuring that the soil moisture content stays above 50% within the TPZs will greatly benefit the trees to be retained on the site and will help offset the impacts of construction.		
Water management	Impacts on water quality and water quantity from the proposed development.	C & O	D	2	Low	The proposed water management measures have been identified in the EIS and would be managed and maintained by the Proponent. An Inspection and Maintenance Plan will be prepared and lodged with the construction certificate for the subdivision works once final design details and the extent and layout of all proposed water management measures is confirmed.	Pr	Low risk of residual impact

						Construction impacts from groundwater would be managed through the implementation of Surface Water Management Plans (SWMPs) in accordance with the Blue Book and detailed planning and management of construction sites to avoid impacting overland flow paths without appropriate mitigation. In addition, water quality impacts would be managed through implementation of water sensitive urban design measures.		
Soils	Potential impacts on soil resources from the proposed development.	C & O	D	3	Low	The Geotechnical Investigation provides the following recommendations during construction: ▪ Excavations: In general, excavation work must be undertaken in accordance with the Safe Work Australia document 'Excavation Work Code of Practice dated March 2015'. ▪ Filling: Fill should be placed and compacted in accordance with AS 3798-2007, "Guidelines on Earthworks for Commercial and Residential Developments". Additional measures include: – Removal of any existing uncontrolled fill, topsoil or deleterious materials from the areas where fill is to be placed. Any unsuitable material including foreign matter must be removed from the fill areas. – Existing fill within the site contained portions of foreign material and may not be considered suitable for re-use as subgrade or lot fill. The existing fill material may be suitable for landscape fill or general fill to be placed at the bottom of deep fill areas; however, this is dependent on the geotechnical consultant engaged to undertake supervision during construction.	Pe and Ma	Low risk of residual impact

  - The fill materials must be free of vegetation including tree stumps, roots, root fibres or other organic matter. Silts or material with high silt portions must be blended with other site soils to be used as fill or otherwise re-used in non-structural areas (subject to individual assessment).
  - Where ponded water (terraced areas in the east), permanent water bodies, or areas of elevated moisture content exist, they should be drained and moisture conditioned prior to placement of filling.
  - Fill should not comprise material with particle sizes of greater than 100mm or 2/3 of the compacted layer thickness.
  - Benching of the slopes where fill is to be placed with slopes steeper than 8H:1V will be required.
- Existing uncontrolled fill: the presence of uncontrolled fill were found across the site. During construction, care should be taken to over excavate and allow these areas to moisture equilibrate prior to placement of structural filling or permanent structures. This is because the existing fill is unsuitable for use as a founding material, and the elevated moisture content that may be present in the underlying natural soils which can impact the soil suction and moisture regime of the soil.

The SSA have identified the following mitigation measures to address impacts to soils.

- Maintenance and improvement of native vegetation along drainage courses;
- Water management of landscaped areas;

	▪ Utilise native and deep rooted plants in order to minimise soil erosion; ▪ Minimise exposure of slightly to moderately saline soils in temporary excavation faces; ▪ Minimise exposure of slightly to moderately saline soils in stockpiles during site works; ▪ Provision of lining in temporary ponds with non-saline clays to minimise groundwater recharge through the soils; ▪ Natural drainage patterns to be maintained where possible; ▪ Drainage infrastructure in vulnerable areas to be installed as soon as practical to avoid excessive water infiltration, ponding of water on site and salt leaching; ▪ Imported material should be tested for salinity to avoid importing saline soils; ▪ In fill areas place the soils with highest salinity at the deepest levels; ▪ Application of gypsum to areas of exposed slightly to moderately saline soils if applicable; ▪ Concrete of suitable strength and reinforcement cover is to be used for drainage structures and wherever contact with water and increased soil moisture is expected; ▪ Pipes used for stormwater drainage should be sealed to minimise the risk of leakage; ▪ Conduct a comprehensive post-earthworks salinity assessment to determine the final salinity status of each individual lot. Erosion and sediment control measures have been identified by AT&L and will be adopted to minimise

						the impact of sedimentation due to construction works: ▪ Minimising the extent and duration of land disturbance. ▪ Diversion of surface runoff from undisturbed areas away from disturbed areas and discharge via suitable scour protection. ▪ Provision of hay bale type flow diverters to catch drainage and divert to “clean” water drains. ▪ Diversion of sediment-laden water into a Type A sediment basin (incorporating an automated flocculant dosing system), which has been sized to treat the entirety of the development area. ▪ Provision of construction traffic shaker grids and vehicle / wheel wash facilities to prevent vehicles carrying soils beyond the Site, in particular onto the road network adjacent to the Site. ▪ Provision of catch drains to carry sediment-laden water to sediment basins. ▪ Provision of silt fences to filter and retain sediments at source. ▪ Rapid stabilisation of disturbed and exposed ground surfaces with hydro-seeding areas where future construction and building works are not currently proposed.		
Flooding	Changes to flood level	C & O	D	4	Low	To manage the proposed flooding impacts generated by the proposed development, the following measures have been identified by AT&L. These measures will be applied where required and	Pe/Ma	Low risk of residual impact.

feasible, to manage risks to workers and visitors, as well as nearby properties.

- Preservation of floodways: design of the development to permit floodwater to pass along the western portions of the site (nearest to Badgerys Creek) such that the development does not result in upstream afflux.
- Preservations of flood storage: fill pads should not displace flood water or increase the flow upstream or downstream.
- Structural design requirements: parts of the building that may be exposed to the PMF should be designed to resist the effect and forces of floodwater. This includes the effects associated with hydraulic forces, buoyance, scour, debris impact.
- Emergency response plan: while most of the site is located outside of the PMF event. Including areas to be occupied during operations, there is a residual risk associated with undertaking works in the potentially flooded areas. A flood emergency response plan should be developed that outlines actions to be undertaken during a potential flood emergency, trigger levels for this plan, roles and responsibilities.
- Flood warning signage: Provide signage in potentially flooded areas providing notice that the area may be subject to flooding, and if appropriate, directions to escape potential floodwaters.
- Flood risk education: Information material should be made available to staff that provides information about the hazards associated with

						flooding and storm events. This should be clearly displayed in a public area.		
Noise and vibration	Unacceptable noise from construction and operations.	C & O	C	3	Medium	Mitigation measures to manage the potential noise and vibration impacts from the construction and operation of the proposed industrial estate is identified and explained in the following sections. **Construction** The impacts during construction of the project are predicted to be typical of major construction works near to sensitive receivers. No works outside of standard construction hours are currently proposed. Accordingly, the use of standard mitigation measures to minimise the impacts is considered sufficient to control majority of the impacts. Management Measures: ▪ Implement community consultation or notification measures. Notification detailing work activities, dates and hours, impacts and mitigation measures, indication of work schedule over the night-time period, any operational noise benefits from the works (where applicable) and contact telephone number. ▪ Site inductions for all employees, contractors and subcontractors. ▪ Where required, attended vibration measurements to be undertaken at the commencement of vibration generating activities. ▪ The CEMP must be regularly updated to account for changes in noise and vibration management issues and strategies. Source Controls:	Pe/Pr	Low risk of residual impact

- Where feasible and reasonable, construction should be carried out during the standard daytime working hours. Work generating high noise and/or vibration levels should be scheduled during less sensitive time periods.
- Construction respite period during normal hours and out-of hours work.
- Use quieter and less vibration emitting construction methods where feasible and reasonable.
- The noise levels of plant and equipment must have operating Sound Power or Sound Pressure Levels compliant with the criteria in Appendix H of the CNVG.
- Plan worksites and activities to minimise noise and vibration to sensitive receivers.
- Non-tonal and ambient sensitive reversing alarms

Path Controls:

- Shield stationary noise sources such as pumps, compressors, fans etc.
- Shield sensitive receivers from noisy activities.

Operation

Where operational noise impacts from the site are predicted to exceed the relevant noise criteria, feasible and reasonable operational noise mitigation and management measures should be considered, with the aim of reducing noise emissions to the relevant criteria.

- Use of quieter mobile plant and equipment options, such as electric forklifts instead of gas forklifts.

						▪ Reduce potential for annoying noise emissions during the nighttime from forklifts and trucks. ▪ Use of roller doors to minimise internal noise breakout. ▪ Production of an Operational Noise Management Plan. ▪ Verify post-construction operational noise levels are in-line with predictions and the mitigation is working as intended.		
Airport Safeguarding	Proposed development does not manage potential impacts to the adjacent airport. Matters like Obstacle Limitation Surfaces, lighting and reflectivity.	C & O	C	4	Low	An *Aviation Safeguarding Assessment* has been prepared by Avlaw Aviation Consulting in relation to the proposal against the relevant National Airports Safeguarding Framework (NASF) Guidelines as they apply to the future WSI In relation to the Guidelines, relevant management and mitigation measures should include: Guideline C: ▪ Regular monitoring surveys ▪ Wildlife hazard assessments ▪ Wildlife awareness and management training for relevant staff ▪ Establishment of bird population triggers ▪ Implementation of activities to reduce hazardous bird populations ▪ Adoption of wildlife deterrent technologies to reduce hazardous bird populations Guideline F: The proposal will require a controlled activity approval to utilise cranes during construction.	Pe/Pr	Low risk of residual impact

Aboriginal Cultural heritage	Impacts to cultural heritage values and items.	C & O	C	3	Medium	An Aboriginal Cultural Heritage Assessment Report (ACHAR) has been prepared by City Plan (2025). The ACHAR documents the process of investigation, Aboriginal community consultation with locally listed Aboriginal communities and the Registered Aboriginal Parties (RAPs); and, assessment with regard to potential Aboriginal cultural heritage and archaeology across the site. Aboriginal community consultation was undertaken in accordance with the 'Aboriginal cultural heritage consultation requirements for proponents 2010' and 'Recognise Country: Guidelines for Development in the Aerotropolis' (2022). The Recognise Country guidelines also informed the cultural heritage assessment undertaken by City Plan. Ongoing consultation will be undertaken with Registered Aboriginal Parties throughout the life of the project in accordance with the Recognise Country: Guidelines for Development in the Aerotropolis. Additionally, the following mitigation measures will be implemented during the construction phase: ▪ The current draft ACHAR should be provided to the RAPs for their review. Any comments provided should be incorporated into the final version of the ACHAR. ▪ A copy of the final ACHAR should be provided to the RAPs, and to the Registrar of the AHIMS. ▪ If the proposed activity is modified and will affect areas outside the assessed study area, the potential for Aboriginal heritage impact in the additional area should be assessed. Once the development approval has been issued, an Aboriginal Cultural Heritage Management Plan should be developed in consultation with the RAPs.	Pr/Ma	Low risk of residual impact

						The Plan should address the recommended measures outlined in Section 6.3 of the ACHAR. In summary: ▪ Conservation of the potential archaeological deposit AHIMS #45-5-5703 (PADLR), as far as possible, and retention of topsoil on site, in situ if possible ▪ Archaeological investigation of the potential archaeological deposit AHIMS #45-5-5703 (PADLR) and the possible hearth AHIMS #45-5-5702 (LR07) ▪ Community collection of the artefact scatter AHIMS #45-5-5696 (LR01) ▪ Aboriginal heritage induction of the excavation and construction team ▪ Stop-work provision incorporated into the project environmental management processes ▪ Analysis and reporting on the results of the archaeological investigation and community collection ▪ Long-term management of the artefact assemblage recovered from the archaeological investigation and community collection, in a location that will be protected from harm.		
Non-Aboriginal Cultural Heritage	Impacts to heritage items and relics within the site.	C & O	D	1	Low	The HAA provides the following recommendations: ▪ Recommendation 1 – No further management required: The report has found no potential for relics of archaeological significance to exist within the subject site, as such, no further archaeological management is required.	Pr/Ma	Low risk of residual impact

						▪ Recommendation 2 – Unexpected Finds Procedure: Should unexpected substantial intact archaeological relics of State or local significance, not identified in this HAA, be unexpectedly discovered during excavation, work must cease in the affected area and Urbis be immediately notified. Depending on the nature of the discovery, Heritage NSW may be notified in writing in accordance with Section 146 of the *Heritage Act 1977*. Additional assessment and possibly an excavation permit may be required prior to the recommencement of excavation in the affected area.		
Contamination	`Excavation of contaminated land.	C	D	4	Low	A Stage 1 Preliminary and Stage 2 Detailed Site Investigation (PSI and DSI) has been prepared by Sydney Environmental Group (SEG) to assess the potential contamination present across the site. A Remedial Action Plan (RAP) has also been prepared to address the issues identified within the PSI and DSI and create a strategy to mitigate potential unacceptable human health and environmental risks. A summary of the mitigation measures for the site include: ▪ Preparation of a Remediation Action Plan. ▪ Undertake an Asbestos Characterisation Assessment of the stockpiled soil materials ('SP01' and 'SP02'); ▪ Undertake a hazardous building materials survey of the remaining structures present on-site (AEC02) prior to demolition. ▪ Following removal of hazardous building materials (if identified) and subsequent demolition of the building materials, a clearance inspection should be carried out by	Ma	Low risk of residual impact

						an appropriately qualified occupational hygienist / NSW LAA; and ▪ A waste classification assessment should be carried out on any soil materials proposed for disposal offsite as per the NSW EPA Waste Classification Guidelines (2014).A waste classification assessment should be carried out on any soil materials proposed for disposal offsite as per the NSW EPA Waste Classification Guidelines (2014).		
Infrastructure Requirements	Impacts to infrastructure and services surrounding the site.	C & O	C	4	Medium	AT&L have prepared a Civil Infrastructure and Servicing Report to assess existing utilities infrastructure capacity for the site as well as proposed infrastructure to be constructed. This includes potable water, wastewater, recycled water, electricity, telecommunications and gas. In addition, an Infrastructure Staging and Delivery Plan (ISDP) has been prepared by Urbis as a strategy for delivering and managing the infrastructure required to support the proposed industrial estate.	Pe	Low risk of residual impact
Air Quality and Odour	Dust and odour emissions from the proposed development will impact surrounding receivers.	C & O	C	3	Medium	Construction air quality mitigation measures have been identified to ensure compliance with the applicable air quality criteria, and are summarised below. These mitigation measures may be adopted in a site-specific Air Quality Management Plan (AQMP). In addition, it is recommended that the Site utilises a Trigger Action Response Plan (TARP) supported by PM_{10} real-time air quality monitors to manage impacts at receptors. TARPs define the minimum set of actions required by workers in response to a deviation from normal working conditions. ▪ Display the name and contact details of person(s) account-able for air quality and dust	Pe/Ma	Low risk of residual impact

	issues on the site boundary. This may be the environment manager/engineer or the site manager. ▪ Develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the Local Authority. ▪ Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken. Make the complaints log available to the local authority when asked. ▪ Record any exceptional incidents that cause dust and/or air emissions, either on- or off-site, and the action taken to resolve the situation in the logbook. ▪ Undertake daily on-site and off-site inspections, where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log available to the local authority when asked. ▪ Carry out regular site inspections to monitor compliance with the DMP, record inspection results, and make an inspection log available to the local authority when asked. ▪ Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible. ▪ Erect solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on site. ▪ Keep site fencing, barriers and scaffolding clean using wet methods.

						▪ Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site cover as described below. ▪ Ensure all vehicles switch off engines when stationary - no idling vehicles. ▪ Avoid the use of diesel- or petrol-powered generators and use mains electricity or battery powered equipment where practicable. ▪ Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction. ▪ Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate. ▪ Use enclosed chutes and conveyors, and covered skips.		
Waste	Inappropriate storage and handling of waste	C & O	C	4	Low	SLR confirm that there are no waste related impacts, and therefore no mitigating measures are proposed beyond the implementation of waste separation and recycling. A summary of the waste avoidance, reuse and recycling measures are listed below. ▪ Waste avoidance: – Returning packaging materials like cardboard to the suppliers through the services of the supplier – Providing ceramic cups, mugs, crockery and cutlery rather than disposable items – Bulk purchasing and the purchasing of items that use minimal packaging	Pe/Ma	Low risk of residual impact

- Presenting all waste reduction initiatives to staff and tenants as part of their induction program, and
- Leasing equipment and machinery rather than outright purchase and disposal.

- Reuse:
  - Possible re-use opportunities include establishing systems with in-house and supply chain stakeholders to transport products in re-useable packaging where possible.
- Recycling:
  - Collecting and recycling e-waste
  - Printer toners and ink cartridges, are collected for appropriate contractor recycling
  - Paper recycling trays provided in communal and staff areas for scrap paper collection and recycling
  - Providing separate receptacles for general waste, recycling and paper and cardboard throughout public areas, as well as within staff areas, to encourage source separation of waste streams
  - Separating, by a reasonable distance, the storage areas for recyclables from the general waste storage areas to avoid cross contamination, and
  - Development of 'buy recycled' purchasing policy
- Litter Management:

- The placement of general waste and comingled recycling bins in easily accessible areas including along walkways and aisles and at pedestrian entry and exit points to the car parks
- The use of water refillers and bubblers to discourage the use of single use plastic water bottles
- Clear signage throughout the warehouse to label bins, direct visitors and staff to bin locations and encourage disposal of waste and recyclables in an appropriate way.
- Training of employees, cleaners and contractors on litter management issues and controls
- Regular litter collections

- Hazardous Waste:
  - If hazardous waste is generated by any tenancy, a separate, enclosed storage area will be established within the tenancy and designed in accordance with the relevant legislation.
- Communication Strategies and Signage:
  - Communication strategies are to be implemented by the facilities manager, including signage and colour coding.
  - Ensure all tenants are informed of correct waste separation and management procedures
  - Provide directional signage to show locations and routes to waste storage areas

						– Clear signage in waste storage areas to instruct users how to correctly separate waste and recycling ▪ Monitoring and Reporting: – During the warehouse's operation, visual assessments of bins and bin storage areas should be conducted by the Facilities Manager – Quantities of waste and recycling associated with disposal of waste and recycling, including dockets, receipts and other physical records should be recorded by the Facilities Manager. This is to allow reviews of the waste management arrangements and provisions at the site over time.		
Hazards and Risk	The application does not propose any Dangerous Goods to be stored or transported on site. Therefore assessment is not required.	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Bush Fire	Impact to the proposed development by threat of bushfire.	O	D	3	Low	A Bushfire Hazard Assessment has been prepared by Black Ash Bushfire Consulting to assess the proposed developments compliance with the Planning for Bushfire Protection (PBP) 2019.	Pe/Ma	Low risk of residual impact

The assessment identified several mitigation measures to be adopted where necessary. They include:

- At the commencement of building works and in perpetuity, asset protection zones (APZ) are to be created in accordance with the Bushfire Assessment. The APZ shall be established and maintained as an inner protection area as outlined within the PBP and the NSW RFS document 'Standards for Asset Protection Zones'.
- Fire hydrants are provided in accordance with Building Code of Australia E1.3, AS2419.1:2005.
- The warehouses are to be constructed to comply with the National Construction Code (2022), Australian Standard AS 3959:2018, Construction of buildings in bush fire-prone areas and/or NASH Standard (1.7.14 updated), National Standard Steel Framed Construction in Bushfire Areas – 2014, and Section 7.5 of the PBP on a prescriptive (deemed to satisfy and/or acceptable solution) basis and/or performance basis.
- The northern elevation of proposed warehouse 5, where located in the BAL-FZ, is to be constructed as a solid 200mm thick precast concrete wall with no windows.
- All proposed roads must comply with section 5.3.2 of the PBP as appropriate.
- A Bushfire Evacuation and Emergency Management Plan should be prepared for each warehouse. The Emergency Management and Evacuation Plan should be developed to recognise the bushfire threat and identify appropriate management triggers.

Biodiversity	Removal of vegetation and potential habitat loss.	C & O	B	3	Medium	Mitigation measures have been identified by Eco Logical Australia within the BMP, Riparian Assessment and the WEMP to address the residual impacts to native vegetation and fauna. They will be adopted where required and practicable during the construction and operational phases of the development. In addition, the VMP outlines measures to enhance the site's biodiversity. The mitigation measures identified within the Biodiversity Assessment include: ▪ Seed collection to be undertaken prior to clearing of native vegetation. ▪ Pre-clearance survey of trees to be removed and identification/location of active nests by a suitably qualified ecologist. ▪ Any native animals are to be relocated from development sites in accordance with the former Office of Environment and Heritage's Policy on the Translocation of Threatened Fauna in NSW, if present during clearing. ▪ Removal of native vegetation by hand tools is preferred. ▪ Boundaries of the impact area to be clearly delineated with heavy duty fencing, retained areas marked with "No Go" signage, in particular the western boundary of the development site. In addition, temporary fencing and signage to be installed at the edge of the development site to prevent entry into the adjacent retained vegetation (i.e. riparian corridor). ▪ Maintain sediment barriers and erosion controls throughout construction and undertake weekly inspections.	Pe	Low risk of residual impact

						▪ Lighting must be compliant with AS/NZS 4282:2019 Control of the obtrusive effects of outdoor lighting. ▪ Dust management controls to be implemented during construction and operations. ▪ If water is being used to manage dust, ensure contaminated water in managed appropriately on and off site in accordance with a water management plan or similar. ▪ Vehicles, machinery and building refuse should remain only within the development site and disposed of at an appropriate waste management facility consistent with the EPA Waste Classification Guidelines. ▪ Vehicles to be washed down before entering and exiting the site to prevent the spread of weeds to or from the impact area and adjacent vegetation. ▪ All staff working on the project will undertake an environmental induction as part of their site familiarisation. Site briefings should be updated based on phase of the work. ▪ All general contractor waste is to be disposed of using provided waste bins.		
Social	Impacts of the construction and operation on surrounding residents, loss of community and Aboriginal heritage items	C & O	C	4	Low	To mitigate the potential negative impacts and enhance the positive impacts, a range of measures have been identified by the SIA to be implemented by the proposed development where necessary and feasible. ▪ Way of life: The proposal includes several mitigation measures to mitigate the disruption to the quiet lifestyle and current way of life	Ma	Low risk of residual impact

experienced by current residents, mostly during construction.

  - The Preliminary Construction Transport Management Plan (CTMP) (Ason 2025) proposes several mitigation methods to minimise impacts on amenity for surrounding residents due to increased traffic during construction activities.
  - The NVIA also recommends the development of a Construction Noise and Vibration Management Plan (CNVMP) before construction, which would identify potential receivers and present mitigations to reduce those impacts to within an acceptable noise criterion.
  - Ensure stakeholder consultation procedures are implemented to inform community members about anticipated impacts.
  - Ensure clear communication with residents and businesses during construction to keep them fully informed and provide access to necessary information, including contact details for construction management in case of issues.

- Community: Changed community composition in alignment with regional strategic growth and vision
  - Seek opportunities to continue engagement with the Council and provide information on design updates, construction milestones, local employment and training opportunities to ensure the proposal’s positive impacts are understood.
- Accessibility: impacts on traffic and access.

- The GTP addresses the key mitigation measures that should be implemented during the operational phase to offset impacts.
- The preliminary CTMP (Ason Group, 2025) addresses the key mitigation measures that should be implemented during construction to offset impacts.
- Provide advanced notice of the construction timeline and road closures, as well as grievance process details, to nearby residents and businesses.
- Ensure that a final Construction Management Plan is prepared during the construction certificate stage to offset the traffic implications created during the construction phase and mitigate the impacts on local communities.

- Culture: potential impacts on Aboriginal culture and heritage.
  - Recommendations outlined within the ACHA.
  - Develop and implement design, employment, skills development, procurement and community benefits opportunities identified in the Connecting with Country report.
  - Foster ongoing engagement with the broader community, specialist Aboriginal consultants, local artists and the First Nations Working Group to ensure Connecting with Country principles are lived throughout the project lifecycle.

- Health & Wellbeing: delivery of healthy and safe working environments. And contribution to urban heat island effect.
  - To enhance opportunities for future workers and visitors to move actively throughout the site in a way that supports healthy lifestyles and social connection, a preliminary GTP has been prepared.
  - Additionally, the Landscape Design Report (Urbis, 2025) respond to the precinct's rural and cultural origins by enhancing the existing riparian corridor along the north-south running Badgerys Creek at the site’s western boundary.
  - Incorporate sound-absorbing materials and acoustic zoning in design of office spaces and lunch rooms, reducing workplace noise to enhance productivity and mental health.
  - Integrate indoor plants/ vertical gardens and nature inspired design elements, within office and worker areas, to promote mental wellbeing and stress reduction.
- Surroundings: Impact on surrounding environmental services, amenity and safety.
  - The Biodiversity Assessment (Eco Logical, 2025) and Riparian Assessment provides a range of recommendations which would enhance the condition, function, and structural value of the existing remnant vegetation and watercourses on the site.
  - Implement appropriate mitigations outlined in the CNVMP for the detailed design phase.

- Consider the CPTED recommendations during the detailed design phase to ensure safe and comfortable worker movement through the site during operating hours.
- Develop a site-specific Air Quality Management Plan (AQMP) that includes mitigation measures related to air quality impacts during the construction of the proposal.
- Develop a Trigger Action Response Plan (TARP) that outlines actions required by workers in response to elevated dust conditions.

- Livelihoods: increased employment opportunities.
  - Consider workforce procurement strategies which support employment opportunities for local, First Nations and underrepresented communities.
- Decision-making Systems: adequate communication and consultation with the local community.
  - Continue engagement, local presence, and consultation in the community during the planning stages to increase the perception of influence.
  - Continue engagement with key stakeholders, including Council and Transport for NSW, to address stakeholder concerns around the proposal's influence on the local road network.

Ecologically Sustainable Development	Development not being undertaken in a manner that adopts ESD principles.	C & O	D	3	Low	A range of sustainability measures have been identified to be incorporated into the proposed design where practicable and feasible. A summary of the proposed measures is also detailed below. ▪ A fully all-electric design with no gas infrastructure; ▪ On-site solar PV system and provision for future battery storage ▪ High-efficiency building services and passive design elements ▪ Integration of Water Sensitive Urban Design (WSUD) measures ▪ Embodied carbon reporting and material efficiency ▪ Design provisions to enable future net zero emissions operation	Pe/Pr	Low risk of residual impact