

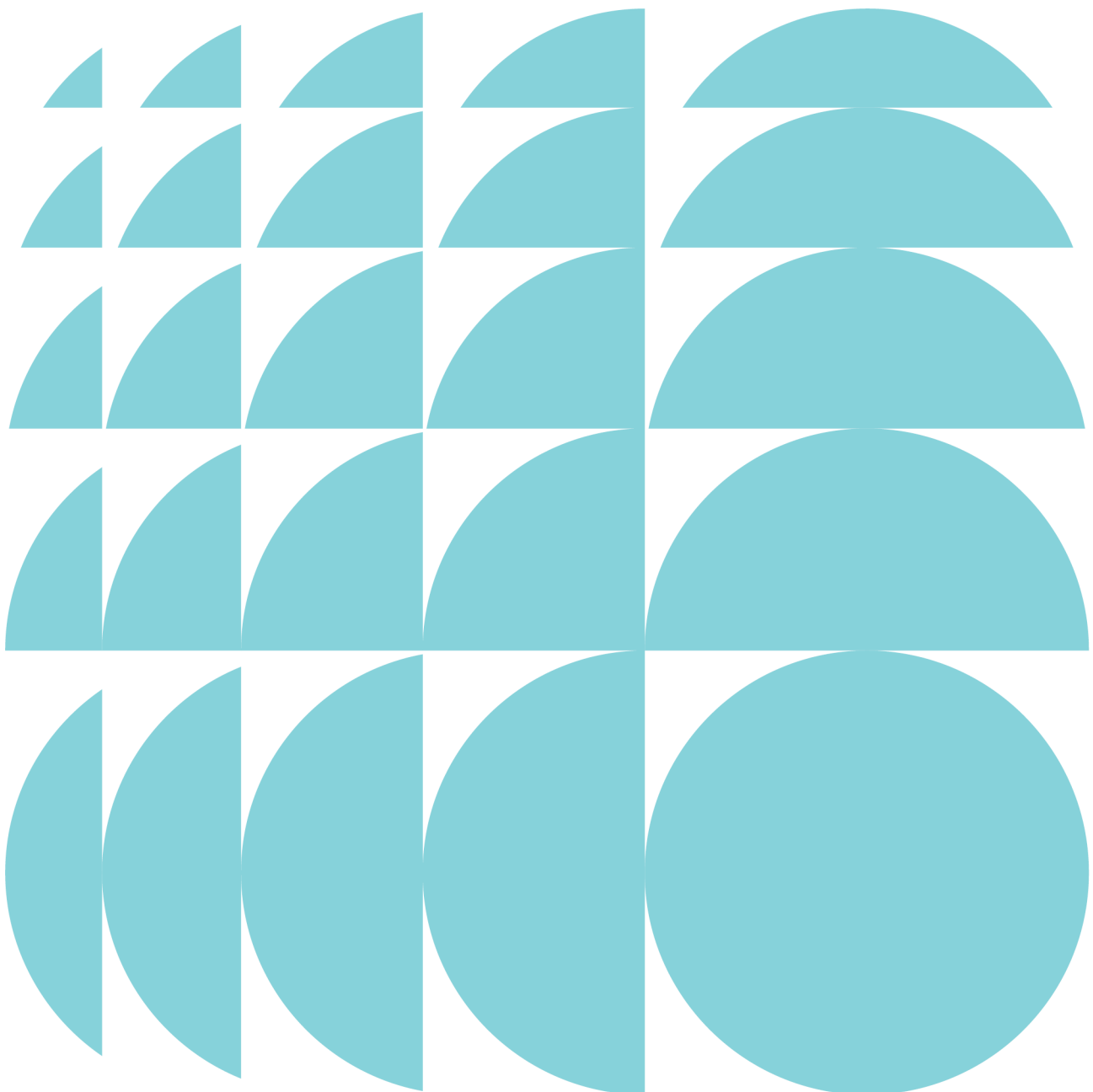
ETHOS URBAN

Environmental Impact Statement SSD-8586218

Lot 4 Skyline Crescent, Leppington
Bringelly Road Business Hub - Temperature
Controlled Warehouse Facility

Submitted to Department of Planning, Industry
and Environment
On behalf of ESR Developments (Australia) Pty
Ltd

27 August 2020 | 2200444



CONTACT

Jim Murray Associate Director jmmurray@ethosurban.com 0420 960 216

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This document has been prepared by:

This document has been reviewed by:



Lara Reynolds 14 August 2020 Jim Murray 14 August 2020

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VERSION NO.	DATE OF ISSUE	REVISION BY	APPROVED BY
1	7 August 2020	LR	JM
2	13 August 2020	LR	JM
3	27 August 2020	LR	JM

Ethos Urban Pty Ltd
ABN 13 615 087 931.
www.ethosurban.com
173 Sussex Street, Sydney
NSW 2000 t 61 2 9956 6952

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F	Transport Assessment	<i>Ason Group</i>
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Statement of Validity

Development Application Details

Applicant name	ESR Developments (Australia) Pty Ltd
Applicant address	Level 29, 20 Bond Street, Sydney 2000
Land to be developed	Lot 4 Skyline Crescent, Leppington
Proposed development	Temperature Controlled Warehouse Facility as described in Section 3.0 of this Environmental Impact Statement

Prepared by

Name	Jim Murray
Qualifications	BA, MURP
Address	173 Sussex Street, Sydney
In respect of	SSD-8586218

Certification

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

it is in accordance with Schedule 2 of the Environmental Planning and Assessment Regulation 2000;

all available information that is relevant to the environmental assessment of the development to which the statement relates; and the information contained in the statement is neither false nor misleading.

Signature



Name	Jim Murray
Date	27/08/2020

Executive Summary

Purpose of this Report

This submission to the Department of Planning, Industry and Environment (DPIE) comprises an Environmental Impact Statement (EIS) for a Development Application under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). It relates to the development of a Temperature Controlled Warehouse Facility in the Bringelly Road Business Hub.

The Western Sydney Parklands are identified as a State Significant Site in Schedule 2 of *State Environmental Planning Policy (State and Regional Development) 2011*. This DA is subsequent to State Significant Development (SSD) Concept Approval 6324. The Development Consent for SSD 6324 issued by the DPIE does not delegate the assessment and determination of future detailed DAs to another consent authority. Therefore, the proposed development is SSD pursuant to section 4.37 of the EP&A Act.

A request for the issue of Secretary's Environmental Assessment Requirements (SEARs) was sought on 17 July 2020. Accordingly, the SEARs were issued on 11 August 2020. This submission is in accordance with the DPIE's guidelines for SSD applications lodged under Part 4 of the EP&A Act, and addresses the issues raised in the SEARs.

Overview of the Project

The DA seeks approval for the detailed development and construction of a warehouse and logistics facility at Lot 4 of the Bringelly Road Business Hub. It includes detailed development and construction of:

- A temperature-controlled warehouse facility of 36,170.7m².
- Ancillary office administration area of 1,023.7m².
- Staff car parking (231 spaces) and hardstand areas for vehicle docking and vehicle manoeuvring.

The Site

The Bringelly Road Business Hub is located approximately 35km west of the Sydney CBD and approximately 2km east of the Leppington Major Centre. The application related to the proposed ESR Facility, and is located on Lot 4.

Planning Context

Section 5.0 of the EIS considers all applicable legislation in detail. The *State Environmental Planning Policy (Western Sydney Parklands) 2009* (WSP SEPP) sets out what development is permissible and the matters for consideration for development located within the Parklands. The proposal is consistent with the SEPP provisions and the approved Concept Plan (SSD 6324) which establishes the uses and the indicative built form of the site.

Environmental Impacts and Mitigation Measures

This EIS provides an assessment of the environmental impacts of the project in accordance with the SEARs and sets out the undertakings made by ESR Developments (Australia) Pty Ltd (ESR) to manage and minimise potential impacts arising from the development.

The key issues related to appropriate environmental management practices during the physical construction of the facility have been assessed and addressed through the mitigation measures have been detailed at **Section 6.0**.

Conclusion and Justification

The EIS addresses the SEARs, and the proposal will provide for a light industrial warehouse facility for the storage, handling and distribution of materials. The development will help realise the objective of providing the Western Sydney Parklands Trust (WSPT) with a secure source of funding to facilitate their program of works and will create new construction and ongoing employment opportunities.

The potential impacts of the development are acceptable and are able to be managed. Given the planning merits of the proposal, the proposed development warrants approval by the Minister for Planning and Public Spaces.

1.0 Introduction

This Environmental Impact Statement (EIS) is submitted to the Department of Planning, Industry and Environment (DPIE) pursuant to Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) in support of an application for State Significant Development (SSD).

The Western Sydney Parklands are identified as a State Significant Site in Schedule 2 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP). This DA is subsequent to SSD 6324, being the Concept Approval relevant to the Bringelly Road Business Hub. The Development Consent for SSD 6324 issued by the DPIE does not delegate the determination of future detailed DAs to another consent authority. Therefore, the proposed development qualifies as SSD pursuant to section 4.37 of the EP&A Act.

This report has been prepared by Ethos Urban on behalf of ESR (the applicant) and is based on the architectural drawings provided by SBA Consulting (**Appendix B**) and other supporting technical information appended to the report (see Table of Contents).

This EIS has been prepared in accordance with the requirements of Part 4 of the EP&A Act, Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation), and the SEARs for the preparation of the EIS, which are included at **Appendix A**. This EIS should be read in conjunction with the supporting information and plans appended to and accompanying this report.

1.1 Overview of Proposed Development

This application seeks approval for the following development:

- A temperature controlled warehouse facility and ancillary administration office.
- Hardstand areas for loading and manoeuvring.
- 231 staff car parking spaces.
- Provision of on site civil infrastructure works to facilitate the development.

1.2 Background to the Development

Development consent SSD 6324 (Concept SSDA or Concept Plan) was granted by a delegate of the NSW Minister for Planning on 13 January 2016 for the Bringelly Road Business Hub Staged Development Application. The approved Concept Approval Site Plan is shown at **Figure 1**.

Development consent 6324 approved the following:

- A concept proposal for a business park comprising 'large format retail premises', 'light industry', 'service station', 'take away food and drink premises', and 'restaurant or café' and a development concept including:
 - land uses;
 - site layout;
 - building envelopes;
 - design parameters; and
 - landscaping.
- Stage 1 subdivision and early works including:
 - demolition of existing structures;
 - subdivision to create eight developable allotments;
 - bulk and detailed earthworks;
 - construction of an access road;
 - stormwater management;
 - civil engineering works; and

- estate landscaping.

The Department have confirmed via letter (dated 12 May 2017) that the deferred commencement conditions have been satisfied.



Figure 1 Concept Approval Site Plan (Site is Lot 4)

The flowing modifications to the concept approval that have been approved are outlined in **Table 1** below.

Table 1 Modifications to SSD 6324

Reference	Description	Status
SSD 6324 MOD 1	A (then) section 96(1A) modification (SSD 6324 MOD 1) was granted consent by the DPE on 14 April 2016. MOD 1 amended the minimum car parking rates for large format retail development.	Approved 14 April 2016
SSD 6324 MOD 2	A second (then) section 96(1A) (SSD6324 MOD 2) was granted by the DPE on 18 July 2018, which pertained to the boundary between Lots 6 and 8 of the Bringelly Road Business Hub. This application resulted in the following key changes to the subdivision of the Bringelly Road Business Hub: <ul style="list-style-type: none"> • An increase in the area of Lot 4 by 0.45Ha. • A decrease in the area of Lot 6 by 0.12Ha. • A decrease in the area of Lot 8 by 0.53Ha. • The creation of a new Lot 9 (formerly known as Part Lot 8). 	Approved 15 August 2018
SSD 6324 MOD 3	MOD 3 was approved on 22 March 2019 and realigned the boundaries between Lots 4, 6 and 8, resulting in the site area of Lot 4 by 0.04ha, an increase in Lot 8 by 0.038 and an increase in Lot 6 by 0.005ha.	Approved 22 March 2019
SSD 6324 MOD 4	The modification realigned the approved subdivision of the BRBH based on corrected boundary surveys. Further detailed surveys were undertaken post approval and the updated subdivision plan is an accurate representation of the lot boundary locations.	Approved 30 October 2019
SSD 6324 MOD 5	The proposed modification realigned the boundary between lots 3 and 4 of BRBH. The modification also made adjustments to the bulk earthworks.	Approved 16 January 2020
SSD 6324 MOD 6	The modification increased the approved verge width and changed the cycle path to a footpath and decreased the width to provide greater area for growth of street trees.	Approved 19 February 2020
SSD 6324 MOD 7	MOD 7 was approved 31 July 2020 and sought approval to: <ul style="list-style-type: none"> • Amend the approved bulk earthworks levels along the western boundary of Lot 4 to 	Approved 31 July 2020

Reference	Description	Status
	<p>match existing surface levels.</p> <ul style="list-style-type: none"> Amend the Lot 3 eastern retaining wall to reflect the proposed amendments to the proposed bulk earthworks levels on Lot 4. 	

1.3 Objectives of the Development

The objectives of the development remain unchanged from the original concept approval, including;

- Utilising low value land to contribute to the long term sustainable future of the Parklands;
- Generating a reliable source of income for the delivery of WSPT projects;
- Providing for the conservation and rehabilitation of significant landscape elements, including remnant vegetation and threatened species; and
- Generating employment opportunities for Western Sydney.

This application will facilitate the delivery of the Bringelly Road Business Hub as envisioned by the modified Concept Plan approval.

1.4 Analysis of Alternatives

1.4.1 Strategic need for the proposal

The strategic need for the proposal was established by the original Concept Plan application. In summary, the development is required to:

- Generate additional employment opportunities for local and regional communities; and
- Grow private business investment to create a sustainable funding base for the Parklands in perpetuity.

Specifically, this proposal has been undertaken by ESR to provide a temperature controlled warehouse facility in a suitable location that has been identified to accommodate this and other compatible uses. This carries strategic merit, as it is consistent with the uses envisioned by the approved Concept Plan.

1.4.2 Alternative Options

Develop an alternative site

A number of alternative sites within the Parklands were explored by the WSPT in responding to the identified need of utilising a portion of the Parklands to generate a stable, long term income stream. Details of these alternative options were outlined in the original Concept Plan application, however, were disregarded due to flood constraints, environmentally sensitive lands, poor or unsuitable access or being highly visible within the main park area.

The Bringelly Road Business Hub site was selected on the basis that it is already physically separated from the main body of the Parklands, has excellent visibility to Bringelly Road, and is close to the M5 and M7. Likewise, this location has been specifically chosen for the purposes of the proposed warehouse on this basis.

Develop the site for alternative uses

The Parklands Plan of Management sets out the principle of deriving income from leasing 2% of its land for business purposes. The proposal contemplated under this application is the highest and best use of the land when considering the context of the site, environmental land use constraints and opportunities. Specifically, the proposed warehouse will capitalise on the logistics of the site's close proximity to the M5, M7 and future Western Sydney Airport which makes the transportation of goods relatively straightforward and efficient. The business will service the needs of the Western Sydney community while limiting any impact on surrounding regional centres.

The proposed use was derived from the Parklands Plan of Management and is subject to Concept Plan approval. Therefore, developing the site for alternative uses (outside of those provided for under the Concept SSDA) is not a viable option.

Do nothing

The ‘do nothing’ option would result in the WSPT losing an opportunity to establish a sustainable funding base for the Parklands. This would jeopardise the ability of the WSPT to deliver on its program of environmental initiatives and its schedule of proposed works. The opportunity to generate additional employment and investment in the area would also not materialise.

1.5 Secretary’s Requirements

In accordance with section 4.39 of the EP&A Act, the Secretary of the Department of Planning and Environment issued the requirements for the preparation of the EIS on 11 August 2020. A copy of the Secretary’s Environmental Assessment Requirements (SEARs) is included at **Appendix A**.

Table 2 provides a detailed summary of the individual matters listed in the SEARs and identifies where each of these requirements has been addressed in this report and the accompanying technical studies.

Table 2 Secretary’s Requirements

Requirement	Location in Environmental Assessment
General	
The Environmental Impact Statement (EIS) must be prepared in accordance with, and meet the minimum requirements of clauses 6 and 7 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000 (the Regulation).	Environmental Impact Statement
In addition, the EIS must include:	Section 3.0
• a detailed description of the development, including:	
– a description of the proposed operation	Section 3.7
– the need and justification for the proposed development	Section 7.0
– likely staging of the development	Section 3.8
– likely interactions between the development and any existing, approved and proposed developments in the vicinity of the site	Section 5.9
– plans of any proposed works with details of the proposed setbacks, site coverage, car parking, landscaped areas	Section 3.1/Appendix B
– details of infrastructure upgrades or items required to facilitate the development, and a description of any arrangements to ensure the upgrades will be implemented in a timely manner and maintained.	Section 3.8
• a detailed description of how the development is consistent with the Bringelly Road Business Hub concept proposal (SSD 6324), particularly the approved land uses	Section 5.2/Appendix E
• consideration of all relevant environmental planning instruments, including identification and justification of any inconsistencies with these instruments	Section 5.1
• a list of any approvals that must be obtained under the Roads Act 1993, or any other Act or law before the development may lawfully be carried out	Section 5.1
• consideration of key issues identified by Government agencies and Liverpool City Council	Section 4.0
• a risk assessment of any potential environmental impacts of the development, identifying the issues for further assessment	Section 6.0
• Where relevant, the assessment of key issues below, and any other significant issues identified in the risk assessment, must include:	Section 2.0/Throughout Assessment
– adequate baseline data	
– consideration of the potential cumulative impacts due to other developments in the vicinity (completed, underway or proposed);	Section 5.0
– measures to avoid, minimise and if necessary, offset predicted impacts, including detailed contingency plans for managing any significant risks to the environment; and	Section 6.0
– a health impact assessment of local and regional impacts associated with the development, including those health risks associated with relevant key issues.	Section 6.0
• The EIS must also be accompanied by a report from a qualified quantity surveyor providing:	Submitted under separate cover
– a detailed calculation of the Capital Investment Value (CIV) (as defined in clause 3	

Requirement	Location in Environmental Assessment	
<p>of the Regulation) of the proposal, including details of all assumptions and components from which the CIV calculation is derived. The report shall be prepared on company letterhead and indicate applicable GST component of the CIV;</p> <ul style="list-style-type: none"> – an estimate of jobs that will be created during the construction and operational phases of the proposed development; – and certification that the information provided is accurate at the date of preparation. 		
Key Issues	Report/EIS	Technical Study
<p>The EIS must include an assessment of potential impacts of the proposal (including cumulative impacts) and develop appropriate measures to avoid, mitigate, manage and/or offset these impacts. The EIS must address the following specific matters:</p>		
<p>Statutory and Strategic Context</p> <ul style="list-style-type: none"> • demonstrate the proposal is consistent with all relevant planning strategies, environmental planning instruments, adopted precinct plans, draft district plan(s) and adopted management plans and justification for any inconsistencies. The following documents must be addressed: <ul style="list-style-type: none"> – State Environmental Planning Policy No. 33 – Hazardous and Offensive Development – State Environmental Planning Policy No. 64 – Advertising and Signage – State Environmental Planning Policy (Infrastructure) 2007 – State Environmental Planning Policy (State and Regional Development) 2011 – State Environmental Planning Policy (Western Sydney Parklands) 2009 – Parklands Plan of Management 2030. • address the matters to be included in future development applications, as described in Part B of the development consent SSD 6324. 	Section 5.1	
<p>Community and Stakeholder Engagement – including:</p> <ul style="list-style-type: none"> • a detailed community and stakeholder engagement strategy identifying who and how stakeholders will be engaged in the process • a report detailing the issues raised and how they have been addressed including any changes to the proposal o details of proposed engagement activities throughout the construction and operation of the development. 	Section 4.0	Appendix D
<p>Traffic and Access – including:</p> <ul style="list-style-type: none"> • a Traffic Impact Assessment detailing all daily and peak traffic and transport movements likely to be generated (vehicle, public transport, pedestrian and cycle trips) during construction and operation of the development, including a description of vehicle access routes and the impacts on nearby intersections • details of access to the site from the road network including intersection location, design and sight distance • an assessment of predicted impacts (including cumulative impacts from nearby surrounding development) on road safety and the capacity of the road network to accommodate the development including existing and future performance of nearby key intersections, including Bringelly Road/ Skyline Crescent and Bringelly Road/ Camden Valley Way/ Cowpasture Road • details of any road upgrades or new roads, roundabouts or intersections required for the development, including demonstration of consultation with the relevant roads authority on the proposed design o details of vehicle circulation of the largest light and heavy vehicles anticipated to access the site, including swept path analysis, loading dock servicing and provisions • detailed plans of the proposed site access and parking provision on site in accordance with the relevant Australian Standards • identification of any dangerous goods likely to be transported on arterial and local roads to/ from the site and, if necessary, the preparation of an incident management strategy o impacts on the safety and capacity of the surrounding road network (including intersections along Bringelly Road and Cowpasture Road) and access points, using SIDRA modelling or similar to assess impacts from current traffic counts and cumulative traffic from existing and proposed development • details of bicycle parking and end of trip facilities • details of impact mitigation, management and monitoring measures. 	Section 5.5	Appendix F
<p>Urban Design</p> <ul style="list-style-type: none"> • Measures to minimise the visual impacts of the development, including: <ul style="list-style-type: none"> – a detailed assessment of the proposed development including height, colour, scale, building materials and finishes, signage and lighting, particularly from nearby residential receivers – detailed plans showing suitable landscaping 	Section 5.9	

Requirement	Location in Environmental Assessment	
<ul style="list-style-type: none"> – justification for any inconsistencies with the Updated Site Design Guidelines prepared by JBA Urban Planning Consultants, dated June 2015 as amended and approved under Condition A9 of the development consent for SSD 6324 – include details of any advertising signage or structures proposed as part of the development. 		
Soil and Water – including: <ul style="list-style-type: none"> • an assessment of potential surface and groundwater impacts associated with the development, including potential impacts on watercourses, riparian areas, groundwater, and groundwater-dependent communities nearby • a detailed site water balance including a description of the water demands and breakdown of water supplies, and any water licensing requirements • description of the measures to minimise water use o details of stormwater/wastewater management system including the capacity of onsite detention system(s), onsite sewage management and measures to treat, reuse or dispose of water • detailed flooding assessment • description of the proposed erosion and sediment controls during construction • characterisation of water quality at the point of discharge to surface and/or groundwater against the relevant water quality criteria (including details of the contaminants of concern that may leach from the waste into the wastewater and proposed mitigation measures to manage any impacts to receiving waters and monitoring activities and methodologies) and • characterisation of the nature and extent of any contamination on the site and surrounding area 	Section 5.11	Appendix H/Appendix I
Noise and Vibration – including: <ul style="list-style-type: none"> • a description of all potential noise and vibration sources during the construction and operational phases of the development, including on and off-site traffic noise • a cumulative noise impact assessment of all potential noise sources in accordance with relevant Environment Protection Authority guidelines • details of noise mitigation, management and monitoring measures 	Section 5.6	Appendix G
Hazards and Risks – including: <ul style="list-style-type: none"> • if the storage of dangerous goods is proposed on site, the EIS must include a preliminary risk screening completed in accordance with State Environmental Planning Policy No. 33 – Hazardous and Offensive Development and Applying SEPP 33 (DoP, 2011), with a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the development. Should preliminary screening indicate that the project is “potentially hazardous” a preliminary hazard analysis (PHA) must be prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis (DoP, 2011) and Multi-Level Risk Assessment (DoP, 2011). • report on consultation with pipeline operator Jemena to ensure that any nearby high pressure gas pipelines remain compliant with the relevant Australian Standards throughout the life of the development and include a Safety Management Study, if necessary. 	Section 4.0/ Section 5.1	Appendix P
Bushfire <ul style="list-style-type: none"> • Prepare a bushfire assessment report which provides an assessment of bushfire hazard, including: <ul style="list-style-type: none"> – details of the storage of flammable materials – an assessment against the requirements of Planning for Bushfire Protection 2019, particularly access and provision of water supply for firefighting purposes – a description of measures to ensure the proposal will not increase the bushfire risk to adjoining lands. 	Section 5.10	Appendix J
Waste Management – including: <ul style="list-style-type: none"> • details of the quantities and classification of all waste streams to be generated on site in accordance with the EPA’s Waste Classification 5 Guidelines (2014) • details of waste storage, handling, transport, and disposal • the measures that would be implemented to ensure the development is consistent with the aims, objectives and guidelines in the NSW Waste Avoidance and Resource Recovery Strategy 2014-21. 	Section 5.16	Appendix L
Air Quality – including: <ul style="list-style-type: none"> • a description of all potential sources of odour and emissions during the construction and operational phases of the development • an assessment of the air quality impacts at receivers during construction and operation of the development, in accordance with the relevant Environment Protection Authority guidelines • details of any mitigation, management and monitoring measures required to prevent and/or minimise emissions. 	Section 5.14	Appendix N

Requirement	Location in Environmental Assessment	
Social and Economic – including: <ul style="list-style-type: none">an analysis of the economic and social impacts of the development, including any benefits to the community	Section 7.1	
Ecologically Sustainable Development and Energy Efficiency – including: <ul style="list-style-type: none">an assessment of how the development will incorporate ecologically sustainable development principles in all phases of the developmentconsideration of the use of green walls, green roof and/or cool roof into the designclimate change projections developed for the Sydney Metropolitan area and how they are used to inform the building design and asset life of the developmentan assessment of the energy uses on-site, including measures proposed to ensure the development is energy efficient.	Section 7.3	
Biodiversity – including: <ul style="list-style-type: none">an assessment and documentation of biodiversity impacts related to the development in accordance with the Biodiversity Assessment Method and documented in a Biodiversity Development Assessment Report (BDAR) where required under the Act, except where a waiver for preparation of a BDAR has been granted.	Section 5.12	Appendix M
Cultural Heritage and Aboriginal Cultural Heritage – including: <ul style="list-style-type: none">consideration of heritage items within the vicinity of the site and any potential heritage impacts associated with the development.	Section 5.13	
Infrastructure Requirements – including: <ul style="list-style-type: none">a detailed written and graphical description of infrastructure required on the site, including a description of any arrangements to avoid locating infrastructure within public domain areasidentification of any infrastructure upgrades required off-site to facilitate the development, including a description of any arrangements to ensure that the upgrades will be implemented in a timely manner and appropriately maintainedan assessment of the impacts of the development on existing utility infrastructure and service provider assets surrounding the site, and a description of how any potential impacts would be avoided and minimised.	Section 5.8	Appendix H
Plans and Documents	Report/Technical Study	
The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the Regulation. Provide these as part of the EIS rather than as separate documents.	Throughout Environmental Impact Statement	
Consultation		
<p>During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners. In particular you must consult with:</p> <ul style="list-style-type: none">Liverpool City CouncilWestern Sydney Parklands TrustTransport for New South WalesSydney Water - Water NSWRural Fire ServiceEnvironment, Energy and Science of DPIEJemenasurrounding landowners and the local communityany other public transport or community service providers. <p>The EIS must describe the consultation process and the issues raised, and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.</p>		

2.0 Site Analysis

2.1 Site Location and Context

The Bringelly Road Business Hub is situated at the south-eastern edge of Western Sydney Parklands. The Bringelly Road Business Hub is bordered by Stuart Road to the north and west, Cowpasture Road to the east and Bringelly Road to the south. Skyline Crescent, which follows the former alignment of Bringelly Road, intersects the site and provides access to the individual allotments. The site forms part of the Western Sydney Parklands and is located within the Liverpool Local Government Area (LGA).

The site is located in close proximity to the M5 and M7 Motorways, which provide excellent access to the state and regional road network, as well as surrounding key employment and industrial lands. The South West Rail Link is also located to the south of the Site, with the site located approximately halfway between Edmondson Park and Leppington Stations.



Figure 2 Bringelly Precinct of the Western Sydney Parklands

Source: WSPT Plan of Management 2030

The ESR Facility is proposed on Lot 4, which is located within the wider Business Hub (see **Figure 2**). The site is bounded by Bedwell Park to the north, Lot 6 to the east (which is used as a warehouse and showroom facility for CFC Group; SSD 18-9511), Skyline Crescent to the south and the undeveloped Lot 3 to the west, which was recently approved for a Bunnings Warehouse (SSD-10366).

The site is owned by the Western Sydney Parkland Trust (the Trust) and ESR has entered a development management agreement with the Trust to develop the land.

This application relates to Lot 4 of the approved Bringelly Road Business Hub. It is a centrally located lot in the wider business hub and has an area of 69,741m² (refer to **Appendix B**).

The site is generally cleared of vegetation and is currently undeveloped (see **Figure 3**).



 Site Boundary



Figure 3 Site Aerial Photograph

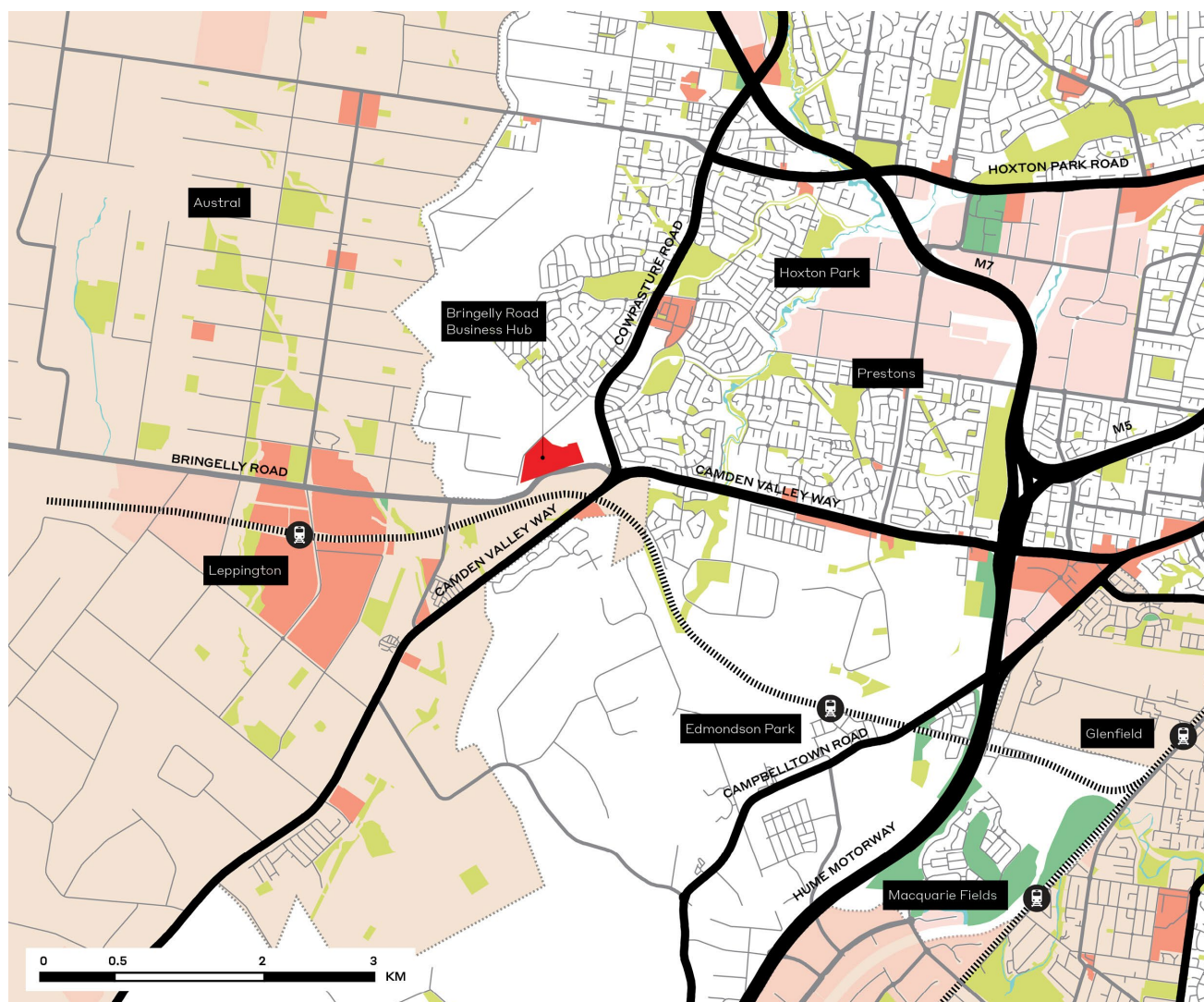
Source: Nearmap & Ethos Urban

2.2 Surrounding Development

The surrounding uses of the Bringelly Road Business Hub comprise:

- Parklands are immediately north of site. Low density residential dwellings in West Hoxton lie further north beyond Stuart Road;
- Low density residential dwellings in Horningsea Park to the east beyond Cowpasture Road;
- Rural residential lands to the west and south;

A map demonstrating the surrounding context is provided at **Figure 4**.



LEGEND

- Subject Site
- Road Network
- |||| Train Line/Station
- Public Open Space
- Private Open Space
- Local and Neighbourhood Centres/
Business Zones
- Employment Land Precincts
- Priority Growth Areas

NOT TO SCALE

Figure 4 Site Context Map

Source: Ethos Urban

3.0 Description of the Development

This chapter of the report provides a detailed description of the proposed development. Architectural drawings are included at **Appendix B**.

This application seeks approval for the following development:

- A temperature controlled warehouse facility and ancillary administration office.
- Hardstand areas for loading and manoeuvring.
- 231 staff car parking spaces.
- Provision of on site civil infrastructure works to facilitate the development.

3.1 Numerical Overview

The key numeric development information is summarised in **Table 3**.

Table 3 Key development information

Component	Proposal
Site area	69,741m ²
GFA	36,170.7m ² , comprising: <ul style="list-style-type: none"> • Warehouse: 34,744m² • Main Office: 1,023.7m² • Warehouse Dock Office 1: 201m² • Warehouse Dock Office 2: 202m²
Maximum Height	13.7m
Boundary Setbacks <ul style="list-style-type: none"> • North • South • East • West 	<ul style="list-style-type: none"> • 68.1m • 12m • 52.25m • 36m
Car spaces	231
Operating Hours	24 hours, seven days per week

3.2 Site Preparation

Site preparation works were approved as part of the original Concept Plan, which included:

- demolition of existing structures;
- bulk and detailed earthworks;
- construction of an access road;
- stormwater management;
- civil engineering works; and
- estate landscaping.

The proposal has been designed in order to integrate with the above early works.

3.3 Built Form

The proposed development has been designed to present as a standard warehouse facility with a maximum height of 13.7m. Specifically, the proposal has been designed around the storage and handling of materials within the

temperature controlled facility and the ancillary office area, which is over two levels. The warehouse component of the development is one storey only.

The built form has also been designed to accommodate truck loading manoeuvring and one way movement around the perimeter of the warehouse for efficient loading, docking and collection of materials.

Land Uses

The proposed development is a light industrial use comprising a warehouse and distribution facility and ancillary office space. A detailed analysis of the proposed land uses, and their consistency with SSD 6324, is provided at **Section 5.3**.

External Materials and Finishes

A range of robust external materials and finishes typical of a warehouse facility are proposed. Further detail has been provided at **Appendix B**.

3.4 Landscaping and Public Domain

Landscape Plans have been prepared by Habit8 (refer to **Appendix C**). Broadly, the proposed landscaping works comprise:

- A variety of different planting types at the street frontage and car parking area, making use of different vegetation heights and tree types.
- Canopy tree planting along the fence line at the site boundary.
- Turfed areas, garden beds and canopy trees within the asset protection zone to the north of the warehouse.
- Minor planting in the staff breakout area adjacent to the south west corner of the warehouse.

An extract from the Landscape Detail Plan, demonstrating the landscaping at the Skyline Crescent frontage, is at **Figure 5** below.

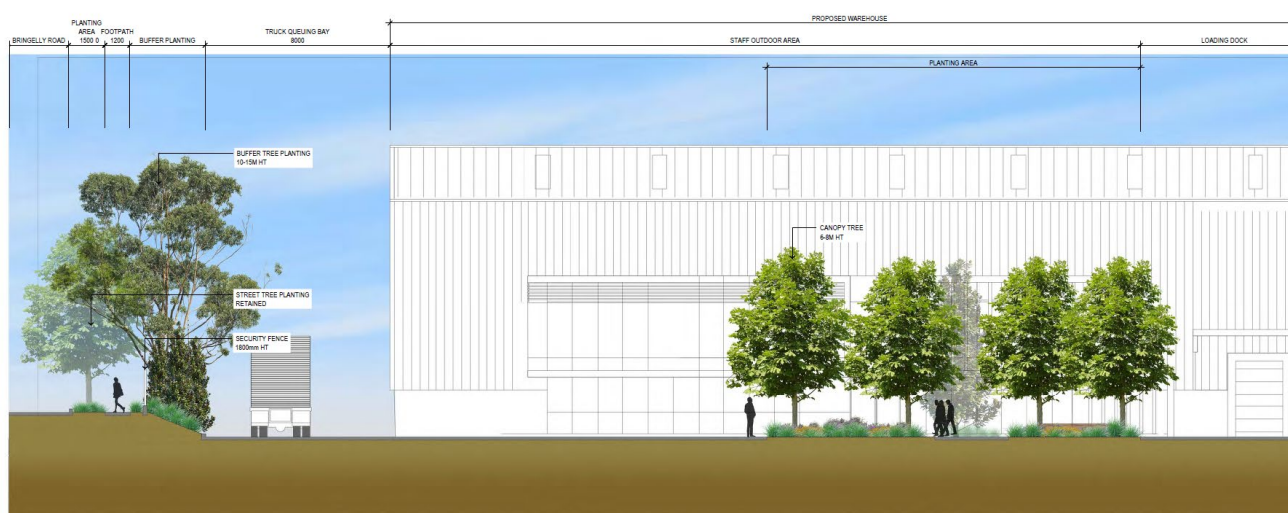


Figure 5 Extract from the Landscape Detail Plan

Source: Habit8

3.5 Pedestrian and Bicycle Access

It is generally expected that staff will use cars to access the site. However, the development will have access to the wider pedestrian and bike network via a shared path on the northern side of Bringelly Road that connects to the regional bicycle and pedestrian network.

3.6 Vehicular Access and Parking

The site has direct frontage to Skyline Crescent along its southern boundary, which connects to the wider road network via Bringelly Road. The site has three vehicular access points from Skyline Crescent, these are:

- A combined entry/exit driveway for the staff car park at the eastern street frontage.
- A truck entrance which provides truck movement around the perimeter of the warehouse in a clockwise direction.
- A truck exit driveway.

231 car parking spaces are proposed for the use of employees and visitors, including the provision of 3 accessible spaces.

3.7 Operational Details

The proposed operational details are outlined below:

- The warehouse will store goods in a temperature controlled environment between 15°Celsius and 25°C.
- Goods will be loaded and unloaded directly from trucks into the warehouse facility via the loading docks located on the eastern and western facades of the building.
- The ancillary office area will accommodate the corporate administration services associated with the ongoing operation of the warehouse.
- The proposed operational hours are 24 hours a day, 7 days a week. The peak hours of operation are expected to be between 8:00am – 5:30pm Monday to Friday.

The proposed development will accordingly generate a variety of different jobs associated with each of the components of the development. Approximately 153 jobs during the construction phase and a further 187 jobs on an ongoing basis through the operation of the site.

3.8 Development Staging

The proposed development is likely to be the fourth stage of the development of the Bringelly Road Business Park, following the development of a Bunnings Warehouse on Lot 3 to the west of the site, which was approved by DPIE in May 2020.

3.9 Proposed External Business Identification Signage

The proposal seeks approval for business identification signage on the northern and southern elevations, as illustrated at **Figure 6** below. The proposal also seeks approval for directory signage which will be located adjacent to Skyline Crescent. The proposed signage includes:

- A 10m wide x 2m high non-illuminated building identification sign located on the northern facade.
- A 10m wide x 2m high non-illuminated building identification sign located on the southern facade.
- A non illuminated building identification sign located on Level 1 of the ancillary office component on the southern façade.
- A 0.9m wide x 3.5m high business identification signage pylon, which will contain six tenant logos.
- A 0.4m wide x 2m high truck directional signage pylon.
- A 0.4m wide x 2m high customer carpark directional signage.

In addition, it is requested that the following condition of consent be imposed to allow for replacement signage to be installed, without consent in accordance with *State Environmental Planning Policy (Exempt and Complying Development Codes) 2008* (the Codes SEPP). Under the provisions of the Parklands SEPP, the Codes SEPP does not apply to the site and replacing approved business identification signage requires development consent under the Parklands SEPP. To avoid the need for unnecessary business identification signage development applications as signage changes in the future it is proposed to adopt the provisions of the Codes SEPP which allow replacement signage to be installed provided certain standards are met. This approach was assessed as appropriate by the Independent Planning Commission when determining SSD 8588 for Eastern Creek Retail Centre Lot 1 which is

within the Parklands Eastern Creek Business Hub. Therefore, it is considered appropriate to apply the same provisions to this development.

Proposed condition:

EXTERNAL BUSINESS IDENTIFICATION SIGNAGE

The replacement of approved business identification signage or the content of such a sign does not require approval if the replacement signage is business identification signage or content and meets the following development standards:

- *not be greater in size than the sign that it replaces, and*
- *not be a sign that is animated, flashing or illuminated, unless the sign it replaces is an illuminated sign, and*
- *not involve any alteration to the structure on which the sign is displayed, and*
- *not obstruct or interfere with traffic signs.*

An assessment of the proposed signage against the relevant requirements of *State Environmental Planning Policy 64 – Advertising and Signage* is provided at **Section 5.8**.

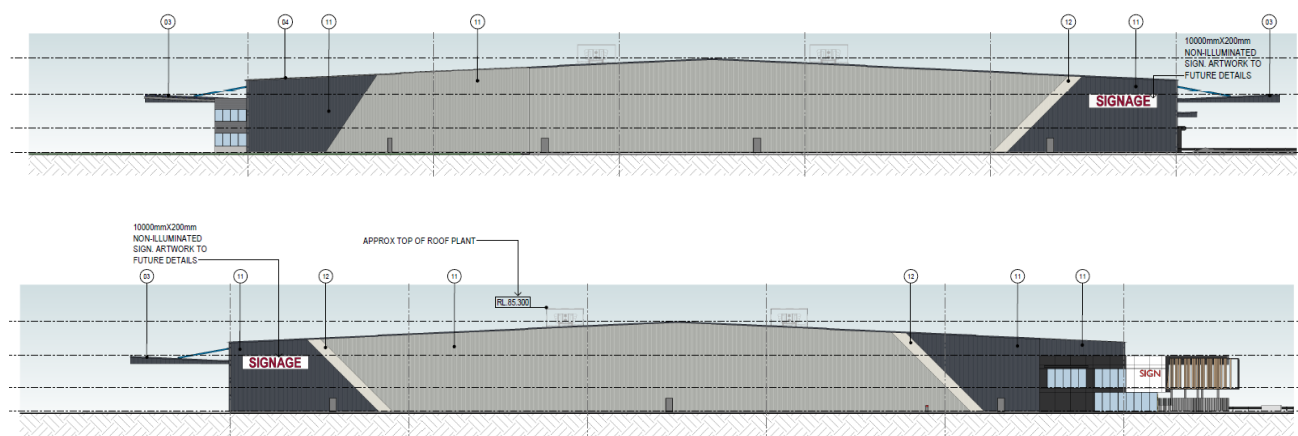


Figure 6 Proposed Tenant Signage Location on the Northern and Southern Elevation

Source: SBA Architects

4.0 Consultation

Extensive consultation was undertaken during the preparation, public exhibition and assessment of the Concept Approval (SSD 6324). It is noted that this DA is generally in accordance with the fundamental components of the Concept Approval. Notwithstanding, the project team have corresponded with the community and the relevant authorities prior to the submission of the EIS, including:

- Western Sydney Parklands Trust
- Liverpool City Council
- Roads and Maritime Services
- Transport for New South Wales
- Office of Environment and Heritage (Through the BDAR Waiver Request provided at **Appendix M**)
- Environment Protection Authority
- Sydney Water – Water NSW
- Jemena
- Water NSW
- Rural Fire Service
- Environment, Energy and Science of DPIE
- Surrounding landowners and the local community

Evidence of the above correspondence has been provided at **Appendix D**. A pre-SSDA meeting was held between ESR and the DPIE on 8 July 2020. Additionally, ESR also attended a meeting with Liverpool City Council on 13 August 2020. A summary of the meeting is shown in **Table 4** below and a response to each issue has been provided.

Table 4 Council Meeting Feedback

Council Comment	Response
Site Design Guidelines	The EIS includes an assessment of the proposal against the Site Design Guidelines (refer to Appendix E).
Ecologically Sustainable Development	The proposal includes sustainable initiatives on-site including: <ul style="list-style-type: none"> • Solar panels for energy supply. • Rainwater harvesting for toilets and garden irrigation. • Low energy lighting.
Urban Heat Island	The proposal includes landscaping in accordance with the Concept Plan that will address the urban heat island effect (refer to Appendix C).
Visual Impact Assessment	A Landscape and Visual Impact Assessment has been prepared (refer to Appendix O). The assessment considers the visual impact of the proposal on the character and sensitivity of the landscape.
SEPP 33 – Hazardous and Offensive Development	The proposal is not subject to SEPP 33 (refer to Appendix P).
Internal Truck Manoeuvring	Internal swept path analysis has provided with the Transport Assessment (refer to Appendix F).

Public Consultation

A Consultation Report has been prepared and is included as **Appendix D**. The Report outlines the consultation that has taken place prior to lodgement. Specifically, this comprised the following:

- Engagement with Liverpool City Council and other relevant authorities / bodies (discussed above).
- A letter was sent to the five immediate neighbouring occupants and landowners providing information on the project and offering the opportunity to meet with the project team to discuss the proposal.

- A postcard was sent to approximately 840 neighbouring landowners, residents and businesses, which contained information on the project and provided an opportunity to provide feedback on the project.
- The establishment of an interactive project website, an 1800 hotline and monitored email address.

In response to this consultation, ESR received and recorded no phone calls or emails following the circulation of the letters and postcards. A full schedule of the issues raised as well as the responses provided are contained at **Appendix D**.

5.0 Environmental Assessment

This section of the report assesses and responds to the environmental impacts of the proposed DA. It addresses the matters for consideration set out in the SEARs (see **Section 1.5**). The Mitigation Measures at **Section 6.0** complement the findings of this section.

5.1 Relevant EPIs, Policies and Guidelines

The relevant strategies, environmental planning instruments, policies and guidelines as set out in the SEARs are addressed in **Table 5**.

Table 5 Summary of consistency with relevant Strategies, EPIs, Policies and Guidelines

Instrument/Strategy	Comments																
Strategic Plans																	
Western Sydney Parklands Plan of Management 2030	The <i>Western Sydney Parklands Plan of Management 2030</i> was adopted in December 2018 and serves to provide a framework for the future operation and development of Western Sydney Parklands through to 2030. The proposal is a direct realisation of the desired future character of the Bringelly Precinct, which seeks to “accommodate WSPT Business Hubs at designated sites along Bringelly Road, with good links to the developing South West Growth area”. This will generate local employment and economic development in Western Sydney.																
State Legislation																	
EP&A Act	<p>The proposed development is consistent with the objects of the EP&A Act for the following reasons:</p> <ul style="list-style-type: none"> • The proposal will promote the proper management, development and conservation of natural and artificial resources for the purpose of promoting the social and economic welfare of the community; • The proposal will promote and co-ordinate the orderly and economic use and development of land, through the use of an appropriate development site for a number of purposes consistent with an approved Concept Plan; • The proposal will protect and conserve the environment, including native animals and plants, threatened species, populations and ecological communities, and their habitats, and; • The proposal will promote ecologically sustainable development. <p>The proposed development is consistent with Division 4.1 of the EP&A Act, particularly for the following reasons:</p> <ul style="list-style-type: none"> • the development has been declared to have state significance; • the development is not prohibited by an environmental planning instrument; and • the development has been evaluated and assessed against the relevant heads of consideration under section 4.15. 																
EP&A Regulations	<p>The EIS has addressed the specification criteria within clause 6 and clause 7 of Schedule 2 of the EP&A Regulation. Similarly, the EIS has addressed the principles of ecologically sustainable development through the precautionary principle (and other considerations), which assesses the threats of any serious or irreversible environmental damage (see Section 5.5).</p> <p>As required by clause 7(1)(d)(v) of Schedule 2, the following additional approvals will be required in order to permit the proposed development to occur.</p> <table> <tr> <th>Act</th><th>Approval Required</th></tr> <tr> <td colspan="2">Legislation that does not apply to State Significant Development</td></tr> <tr> <td>Coastal Protection Act 1979</td><td>N/A</td></tr> <tr> <td>Fisheries Management Act 1994</td><td>N/A</td></tr> <tr> <td>Heritage Act 1977</td><td>N/A</td></tr> <tr> <td>National Parks and Wildlife Act 1974</td><td>N/A</td></tr> <tr> <td>Native Vegetation Act 2003</td><td>N/A</td></tr> <tr> <td>Rural Fires Act 1997</td><td>N/A</td></tr> </table>	Act	Approval Required	Legislation that does not apply to State Significant Development		Coastal Protection Act 1979	N/A	Fisheries Management Act 1994	N/A	Heritage Act 1977	N/A	National Parks and Wildlife Act 1974	N/A	Native Vegetation Act 2003	N/A	Rural Fires Act 1997	N/A
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Instrument/Strategy	Comments																		
	<table> <tr> <td>Water Management Act 2000</td><td>N/A</td></tr> <tr> <td colspan="2">Legislation that must be applied consistently</td></tr> <tr> <td>Fisheries Management Act 1994</td><td>No</td></tr> <tr> <td>Mine Subsidence Compensation Act 1961</td><td>No</td></tr> <tr> <td>Mining Act 1992</td><td>No</td></tr> <tr> <td>Petroleum (Onshore) Act 1991</td><td>No</td></tr> <tr> <td>Protection of the Environment Operations Act 1997</td><td>No</td></tr> <tr> <td>Roads Act 1993</td><td>Yes</td></tr> <tr> <td>Pipelines Act 1967</td><td>No</td></tr> </table>	Water Management Act 2000	N/A	Legislation that must be applied consistently		Fisheries Management Act 1994	No	Mine Subsidence Compensation Act 1961	No	Mining Act 1992	No	Petroleum (Onshore) Act 1991	No	Protection of the Environment Operations Act 1997	No	Roads Act 1993	Yes	Pipelines Act 1967	No
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Petroleum (Onshore) Act 1991	No																		
Protection of the Environment Operations Act 1997	No																		
Roads Act 1993	Yes																		
Pipelines Act 1967	No																		
Western Sydney Parklands Act 2006	The WSPT manages the parklands known as the Western Sydney Parklands. The Act controls the administration and management of the park and allows the Trust to make regulations regarding (among others) the use, care and control of the lands. A Plan of Management for the Parklands was adopted by the Minister for Western Sydney in December 2018. The development supports the objectives of this Plan of Management.																		
SEPP (State and Regional Development)	Development that has a capital investment of more than \$10 million on land identified as being included within the Western Sydney Parklands Map is State Significant – the proposal meets this criteria.																		
SEPP (Western Sydney Parklands) 2009;	The Western Sydney Parklands SEPP sets out what development is permissible and the matters for consideration for development located within the Parklands. The approved Concept Plan establishes the uses and built form of Lot 4 of Bringelly Road Business Hub. The proposal remains generally consistent with the Concept Plan and the relevant matters of consideration are addressed in Section 5.2 below.																		
SEPP 33 - Hazardous and Offensive Development	The proposed operations are not of a nature that is considered potentially hazardous or offensive. A letter has been prepared by Riskcon Engineering (Appendix P) which confirms that there are no dangerous goods stored at the site and therefore, no further assessment is required.																		
SEPP 55 – Remediation of Land	Contamination was addressed as part of the original Concept Plan Approval and the site can be made safe for the proposed use in accordance with SEPP 55.																		
SEPP (Infrastructure)	The development has a GFA of more than 20,000m ² and therefore is considered a traffic generating development under clause 104 if the ISEPP. The application will be referred to the RMS.																		
SEPP 64 – Signage and Advertising Structures	Clause 6(1) of the Western Sydney Parklands SEPP excludes the provisions of SEPP 64 for development within the Western Sydney Parklands. Nevertheless, an assessment has been undertaken that considers the proposed business identification signage against the relevant matters within the SEPP and the Bringelly Road Urban Design Guidelines. Refer to Section 5.7 and Appendix E .																		
Local Planning Instruments and Controls																			
Liverpool Local Environmental Plan 2008 and Development Control Plan 2008	Clause 6(1) of the Western Sydney Parklands SEPP excludes the provisions of the Liverpool LEP 2008 for development within the Western Parklands and Development Control Plans do not apply to SSD.																		
Bringelly Road Business Hub Design Guidelines	A summary of the proposals consistency with the Design Guidelines has been undertaken and provided at Appendix E .																		

5.2 Consistency with Concept Approval (SSD 6324)

In accordance with section 4.24 of the EP&A Act, the determination of any development application in respect of a site that is subject to a Concept DA 'cannot be inconsistent' with the original consent. The proposed development is entirely consistent with the Concept DA consent (SSD 6324) in relation to maximum building height, land uses, gross floor area, building envelopes, parking and loading arrangements. **Table 6** addresses conditions of SSD 6324.

Table 6 SSD 6324 – Conditions to be met in future development applications

Condition	Response
SCHEDULE 3 - PART A	
A1. Development Description	The proposal is for a light industrial development. The proposed use is entirely consistent with those approved by the Concept Approval. This is discussed further at Section 5.3 below.
A2. Obligation to Minimise Harm to the Environment	Proposed mitigation measures are outlined at Section 6.0 . The proposal implements all reasonable measures to prevent and/or minimise any harm to the environment that may result from the construction or operation of the development.
A3 Statutory Requirements	The proponent will ensure that all licences, permits, and approvals/consents are obtained as required by law and maintained as required throughout the life of the Development.
A4-A5. Determination of Future Development Applications	This SSD application seeks consent for the detailed design of the ESR Facility as required by this condition.
A6-A7. Development in Accordance with Plans and Documents	The detailed design of the development is generally consistent with the referenced structure plans. Refer to Section 5.4.
A8. Modifications to the Concept Proposal	N/A
A9. Modifications to the Concept Proposal - Site Design Guidelines	N/A
A10-A12. Traffic and Access	N/A
A13-A14. Maximum Gross Floor Area and Site Coverage	The proposed development is consistent with the Maximum GFA and Site Coverage relevant to the proposal. This has been further discussed at Section 5.3 .
A15-A18.	N/A
PART B	
B1-B3. Building Design	Refer to Section 5.4 . The proposal is generally consistent with the Updated Site Design Guidelines. A detailed assessment against the requirements of the Design Guidelines has been prepared and included within Appendix E . Architectural drawings including all the required details of the design have been prepared by SBA Architects and are provided at Appendix B .
B4-B5. Landscaping	Landscape Plans have been prepared by Habit8 and included at Appendix C . An assessment of the proposal against the relevant landscape, public domain principles and development guidelines is provided at Appendix X .
B6. Visual Impact	Refer to Section 5.10 .
B7-B10. Traffic, Access and Parking	Refer to Section 5.6 . A Transport Assessment addressing these matters has been prepared by Ason Group and included at Appendix F .
B11. Noise and Vibration	Refer to Section 5.7 . A statement addressing these matters is submitted at Appendix G .
B12. Construction	Refer to Section 5.18 .
B13. Developer Contributions	The DPIE advised at a meeting held on Tuesday 7 November 2017 that no infrastructure contributions were applicable to the neighbouring SSDA 8900. Given this, there is no material reason why contributions should be required for this SSDA.
B14. Ecologically Sustainable Development	A detailed assessment of the principles of Ecologically Sustainable Development is provided at Section 7.3 .
B15. Stormwater	Refer to the Civil Engineering Plans submitted at Appendix H .
B16. Crime Prevention	Refer to Section 5.9 . A CPTED assessment has been prepared by Ethos Urban, and is included at Appendix I .

Condition	Response
B17. Bushfire	Refer to Section 5.11 . A Bushfire Protection Assessment dated July 2020, has been prepared by Eco Logical and is included at Appendix J .
B18. Disability Access	Refer to Section 5.16 . A BCA Report has been prepared by McKenzie Group and included at Appendix K . It incorporates a Disability Access Review and compliance with the <i>Building Code of Australia</i> , as relevant.
B19. Building Code of Australia	
B20. Waste	Refer to Appendix L .
B21. Outdoor Lighting	The proposed lighting will comply with AS/N21158.3:1999 Pedestrian Area (Category P) Lighting and A54282: 1997 Control of Obtrusive Effects of Outdoor Lighting. Appropriate conditions to ensure compliance can be applied to any future development consent.
B22. Advertising Signage	Proposed business identification signage is shown on the plans at Appendix B , and an assessment against SEPP 64 is detailed at Section 5.8 .
B23. Staging Plan	The construction of buildings shall be in accordance with the ongoing staging approved at the Bringelly Road Business Hub.
B24. Safety Management Study	N/A
B22. Hazards and Risks	N/A
B23. Underground Petroleum Storage System	N/A – The pipeline does not run through the development lot. A Consultation Report has been prepared by Ethos Urban and is included at Appendix D , which includes consultation with Jemena to confirm requirements.
B24. Food Outlet	N/A
B26. Utility Services	N/A – refer to Section 5.8 .

5.3 Land Uses and Gross Floor Area

The proposal seeks approval for a 'light industry' use, which has been approved under the Concept Approval. The warehousing and distribution forms the light industrial component and the office space is ancillary to this use. The following table provides a summary of GFA already approved at the BRBH. The proposed 36,110m² will not exceed the total maximum 120,000m² GFA, nor will it exceed the maximum 100,000m² Light Industrial GFA permitted under the Concept Approval. For these reasons, the proposed land use and gross floor area is consistent with the Concept Approval.

Table 7 GFA Assessment

Land Use	Concept Plan Max GFA (m ²)	Approved GFA	Balance
Large Format Retail	50,000m ²	<ul style="list-style-type: none"> SSD-9511 CFC Group Large Format Retail Facility: 6,515m² SSD-10366 Bunnings Warehouse Leppington: 14,194m² 	29,291m ²
Light Industry	100,000	<ul style="list-style-type: none"> SSD-8900 Steelforce Warehouse Facility: 11,200m² 	88,800m ²
Other Retail	3,100	NA	3,100m ²

5.4 Built Form, Urban Design and Landscaping

The proposed built form has been designed with consideration to a number of factors including the Concept Plan approval, the Design Guidelines, existing site conditions and the amenity of surrounding properties. The building has a maximum building height and incorporates setbacks that are consistent with the Design Guidelines.

The building mass and location of the proposed warehouse building varies from the indicative building envelopes prescribed in the Design Guidelines. Notwithstanding, the proposed development will provide better outcomes for the site as it will ensure that adequate area is available for driveways and access, onsite parking and manoeuvring of vehicles, and will accommodate landscaping, open space for employees and screening of loading and storage areas.

Additionally, the site is located within the Parklands and the landscape design of the proposal seeks to respond to the Concept Approval, by creating a high-quality landscaped setting. The proposed landscaping seeks to improve the amenity of the site by providing visual relief and mitigating potential heat island effects generated by the car parking and hard stand areas.

An analysis of the proposal against the Design Guidelines of the Concept Approval is included at **Appendix E**. The assessment demonstrates that proposal is generally consistent with the guidelines.

5.5 Traffic, Parking and Accessibility

Ason Group has undertaken a Transport Assessment to investigate the potential traffic and transport implications arising from the proposed development. The Assessment is included at **Appendix F** and has been prepared with reference to the assessment undertaken to inform the approved Concept Plan.

The assessment confirms that the development is acceptable on traffic impact grounds and is entirely consistent with the traffic analysis previously undertaken for SSD 6324. It will not result in any adverse impacts on the surrounding road network, including Bringelly Road. The assessment also notes that the traffic generation will be less intensive than what was expected in the Concept Plan.

In addition, on site car parking has been provided in accordance with the rates detailed in the Concept Plan, and includes an appropriate allocation of accessible parking spaces as per Liverpool DCP. The ESR Facility has been designed in accordance with the relevant Australian Standards which include AS2890.1, AS2890.2 and AS2890.6 and can accommodate a B-Double vehicle up to 26m. It is anticipated that full design compliance with the relevant Australian Standards would form a standard Condition of Consent further to approval, which will also provide for any minor design changes if required.

5.6 Acoustic Impact

A Noise Impact Assessment has been prepared by SLR Consulting (**Appendix G**). A summary is provided below and mitigation measures are provided at **Section 6.0**. The report establishes the ambient noise quality around the site and assesses the potential noise impacts on the surrounding receivers from predicted noise emissions from the proposal. The potential noise sources include:

- Truck and light vehicle movements on internal access roads and in parking areas;
- Loading of trucks in the various loading docks;
- Truck parking; and
- Roof mounted mechanical plant.

The nearest sensitive receivers and noise logger locations are illustrated at **Figure 7**. The nearest sensitive receivers are residential dwellings to the north-east on Stuart Road, the closest of which are approximately 200m from the site. Additional residential receivers are also located to the east and west, although these are at a further distance from the site and are generally shielded by the buildings on the adjoining lots.

The assessment determined there may be relatively minor noise level exceedances from the proposed operations. Notwithstanding, noise monitoring data shows that existing LAeq noise levels are higher than the predicted noise from the proposal. When considering this, together with the relatively low number of trucks that would access the site at night, the predicted exceedance is considered minor. Ultimately, the report confirms that the minor exceedances do not warrant any specific mitigation measures during operation.



Figure 7 Site and Surrounding Noise Receivers

Source: SLR

5.7 Business Identification Signage

The development proposes three business identification signs and three directory signage pylons. They are integrated into the façade design of the proposed building and within the landscaping on site. Clause 16 of the WSP SEPP requires signage to be consistent with any signage policy prepared by the WSPT. The *Western Sydney Parklands Design Manual* includes design provisions relating to general signage within the Parklands but does not contemplate the types of business identification signage proposed in this DA.

Clause 6 of the WSP SEPP also 'switches off' the provisions of SEPP 64. Notwithstanding, given the absence of any controls, an assessment against the assessment criteria provided at Schedule 1 of SEPP 64 has been undertaken to inform a merit assessment of the proposed signage (refer to **Table 8**). The assessment demonstrates that the proposed signage is appropriate in the circumstances.

Table 8 Assessment of the proposal against the assessment criteria contained at Schedule 1 of SEPP 64

Assessment Criteria	Comment	Compliance
<i>Is the proposal compatible with the existing or desired future character of the area of locality in which it is proposed to be located?</i>	The desired future character of the Bringelly Road Business Hub is a typical industrial and large format retail estate. The proposed signage is typical of development in this context.	Y
<i>Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?</i>	As above.	Y
<i>Does the proposal detract from the amenity</i>	The proposed development is located internally to the	Y

Assessment Criteria	Comment	Compliance
<i>or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas?</i>	Bringelly Road Business Hub site, and accordingly will not be directly adjacent to any surrounding residential areas. On this basis, the proposal is considered acceptable and will not result in any adverse impacts on the surroundings.	
<i>Does the proposal obscure or compromise important views?</i>	The proposed signs are located on the facades of the building and within the lot boundaries. They will not obscure any surrounding views.	Y
<i>Does the proposal dominate the skyline and reduce the quality of vistas?</i>	The proposed signs are located on the facades of the building and within the boundaries of the site. They will have no impact on the skyline or reduce the quality of any vistas.	Y
<i>Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?</i>	The scale, proportion and form of the signs are integrated with the building façade, surrounding uses and architecture. The signs are appropriate and compatible with the business park streetscape.	Y
<i>Does the proposal contribute to the visual interest of the streetscape, setting or landscape?</i>	The proposed signage is typical for an industrial use. It will identify the tenants of the premises in an appropriate manner.	Y
<i>Does the proposal reduce clutter by rationalising and simplifying existing advertising?</i>	N/A – this signage relates to a new building.	N/A
<i>Does the proposal screen unsightliness?</i>	The proposed signs are located on the façade of the building on which they're located, and also within the boundaries of the site. They do not screen unsightliness.	Y
<i>Does the proposal protrude above buildings, structures or tree canopies in the area or locality?</i>	The proposed façade signs are located on the building and accordingly do not protrude above the building. The proposed pylon signage will have a maximum height of 3.5m and therefore will be well below the building height.	Y
<i>Does the proposal require ongoing vegetation management?</i>	The proposal does not require ongoing vegetation management.	Y
<i>Does the proposal respect important features of the site or building, or both?</i>	The scale, proportion and form of the signs is integrated with the building façade, surrounding uses and architecture. There are no significant site features.	Y
<i>Does the proposal show innovation and imagination in its relationship to the site or building, or both?</i>	The proposed signage is typical for the types of use proposed.	Y
<i>Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed?</i>	The signage will be integrated with the building structure.	Y
<i>Would illumination affect safety for pedestrians, vehicles or aircraft?</i>	The proposed signage will not be illuminated and therefore, would not affect safety for pedestrians, vehicles or aircraft.	Y
<i>Would illumination detract from the amenity of any residence or other form of accommodation?</i>	N/A – The proposed signage will not be illuminated.	N/A
<i>Can the intensity of the illumination be adjusted, if necessary?</i>		N/A
<i>Is the illumination subject to a curfew?</i>		N/A
<i>Would the proposal reduce the safety of any public road?</i>	The proposal will not reduce the safety of any public road.	Y
<i>Would the proposal reduce safety for pedestrians / cyclists?</i>	The proposal will not reduce safety for pedestrians or cyclists.	Y
<i>Would the proposal reduce safety for pedestrians, particularly children, by obscuring sightlines from public areas?</i>	The proposal will not affect safety for pedestrians, particularly children. The façade signage is located flush on the building on which it is proposed. In addition, the pylon signage provides customer identification and vehicle	Y

Assessment Criteria	Comment	Compliance
	directions, while remaining within the site boundary, which will not obscure site lines from public areas.	

5.8 Infrastructure Requirements

As detailed in the Civil Plans provided at **Appendix H**, all utilities will be provided on site and will not be located within the public domain. It is not anticipated that the proposed development will require any offsite infrastructure, services or utilities, above that already provided to service the business hub, to facilitate the ongoing use of the warehouse and logistics facility. No adverse impacts regarding infrastructure requirements will arise as a result of the proposal.

5.9 Visual Impact

The proposed development has been designed to generally align with the indicative built form envisioned by the Concept Plan and Design Guidelines. Specifically, the following key points are noted:

- The development complies with the maximum height, as well as key setbacks prescribed under SSD 6324.
- The development will result in no change in view for any nearby residential properties. This is in part due to the developments consistency with the surrounding character of existing and future development within the Bringelly Road Business Hub.
- The development has been assessed against the Design Guidelines (**Appendix E**) and is generally consistent with these provisions.
- The proposed landscaping strategy will provide a large setback from Bringelly Road and Stuart Road to soften the appearance of the warehouse for any passing motorists, pedestrians and cyclists.

On this basis, the proposed development will not result in any adverse visual impacts. A Visual Impact Assessment has been provided at **Appendix O** which demonstrates that the visual impacts will be consistent with those expected under the Concept Approval and are therefore acceptable.

5.10 Bushfire

A Bushfire Protection Assessment has been undertaken and is located at **Appendix J**. The report considers the SEARs and the relevant Bushfire Conditions of Consent prescribed by SSD 6324.

The proposed development is adequately protected from bushfires entering the site through the application of the 8.5m Asset Protection Zone (APZ) at the northern boundary of the site. It is noted that the Concept Approval requires a 15m APZ, notwithstanding, the proposed 8.5m APZ is in accordance with Planning for Bushfire Protection (PBP) 2019 and satisfactory for the proposed use. Refer to **Appendix J** for further discussion.

Overall, it is determined that the proposal will not result in any adverse impacts in regard to bushfire risk.

5.11 Soil and Water

As part of the development, Costin Roe Consulting has provided Civil Engineering Plans and a Civil Engineering Report which are located at **Appendix H** and **Appendix Q**, respectively. This documentation provides a summary of the earthworks, stormwater management and erosion control measures proposed as part of the development. These matters have been further discussed below.

Water Quantity Management

A stormwater system has been designed for the site by Costin Roe Consulting, which is based on the relevant national design guidelines, Australian Standard Codes of Practice, the Liverpool City Council DCP and accepted engineering practice. Runoff from the building will be managed in accordance with AS3500.3 Rainfall and Runoff. In regard to stormwater quantity management, attenuation of stormwater runoff from the western catchment of the development is proposed to be managed via a detention tank provided in the north-west of the site. This is consistent with the Concept Plan strategy. On site detention is also proposed in the form of a 1660m³ tank at the north of the property. The proposed system accords with the Council's requirements.

Water Quality Management

Stormwater treatment measures are proposed in accordance with the approved Concept Plan and Council's requirements. This comprises installing an appropriately sized Gross Pollutant Trap to treat water from parking, hardstand, and roof areas, and using the Bedwell Park Wetland (which is within the area of the concept plan, north of the site) as a tertiary treatment system that will capture stormwater discharged through an existing flow path in the north of the site. Final details of the system will be provided during the detailed design phase of the development and will be capable of achieving Council's annual percentage pollutant reductions.

Erosion and Sediment Control

A number of erosion and sediment control measures have additionally been contemplated by Costin Roe Consulting, which are demonstrated on the Erosion and Sediment Control Plans at **Appendix H**. These plans detail how the proposed development will manage erosion and sediment control during the construction process.

5.12 Biodiversity

The site covers an area of 69,741m² and does not contain any vegetation or habitat features including dams or waterbodies. The proposed development does not involve the removal of vegetation for the proposed works and the site does not contain habitat for threatened species or ecological communities.

Accordingly, A BDAR Waiver Request has been provided at **Appendix M**.

5.13 Heritage

Aboriginal Heritage

In a letter dated 1 April 2016, the DPIE confirmed that Concept Approval Condition B3 had been satisfied by the Aboriginal Heritage Assessment Report prepared by AHM, dated 20 October 2015. No further action is required to this respect.

European Heritage

The site is not a heritage item, located in a conservation area, or near any State or local heritage items. The DPIE's assessment of SSD 6324 concluded that:

"the proposed development is unlikely to have an impact on any items of heritage significance and is satisfied that the proposed development can proceed".

On this basis, no further assessment of heritage impact is considered necessary.

5.14 Air Quality

An Air Quality Impact Assessment has been prepared by SLR Consulting in order to determine the air quality impacts of the development during both the construction and operation phases of the development. This assessment has been provided at **Appendix N** and the potential construction and operation impacts is summarised below.

Construction Impacts

During construction, dust emissions are identified as the primary concern. The nearest existing residential receivers are located approximately 140m to the northeast of the site. SLR have undertaken a risk assessment in accordance with the *IAQM Guidance on the Assessment of Dust from Demolition and Construction* to determine the potential air quality impacts for surrounding residential receivers during the construction phase. SLR consider the dust emissions from construction works to be of a medium magnitude. On this basis, a detailed review of the mitigation measures at Section 6.2.4 of the Air Quality Impact Assessment is recommended to be performed as part of the development of the Construction Management Plan, with the most appropriate measures adopted.

Operational Impacts

Air quality issues associated with the proposed warehouse operations predominantly relate to emissions of wheel generated dust and products of combustion from trucks and other vehicles accessing and idling at the site. SLR

notes that these emissions will be of a similar nature to the existing traffic emissions on Bringelly and Cowpasture Roads. However, the scale and magnitude of emissions from the site (approximately 227 truck movements per day) will be significantly lower than that on Bringelly and Cowpasture Roads (an estimated annual average daily traffic of 29,000 to 43,000 vehicles per day). On this basis, the potential impact of the site on the local sensitive receptors is concluded to be neutral for all receptors.

5.15 Building Code of Australia

A Compliance Assessment against the Building Code of Australia (BCA) and relevant Australian Standards has been prepared by McKenzie Group and is submitted with this application at **Appendix K**. This assessment has included a review of the architectural design documents for compliance with the relevant considerations in the BCA. McKenzie Group have concluded that the proposal is capable of complying with the provisions of the BCA. Where the proposed design does not comply with the relevant requirements, McKenzie Group offers alternative design solutions, which will be confirmed prior to the issue of the relevant Construction Certificate.

5.16 Waste Management

SLR Consulting have prepared a Waste Management Plan (**Appendix L**) which identifies the potential waste likely to be generated on site during the construction and operational phases, and determines how the waste should be handled, processed, disposed of or recycled.

Construction Waste

The waste generated during the construction phase falls into four broad categories:

- Construction waste;
- Plant maintenance waste;
- Packaging waste; and
- Work compound waste from on-site employees.

SLR has adopted the waste generation rates to determine the quantity of waste generated from the proposed construction. The Site Manager should use these rates to determine the numbers, capacity and location of skip bins needed on site during construction. Best practice waste management will be implemented during the construction phase and waste will be reused and recycled where possible.

Operational Waste

Waste generated during the operational phase of development is likely to include:

- Domestic waste generated by employees, including food waste;
- Bulk packaging wastes, including polystyrene, plastic wrapping and cardboard boxes;
- Office waste
- Garden organic waste from landscaped areas;
- Bulky waste items such as furniture and e-waste; and
- Stores, plant and general maintenance waste.

Based on the waste generation rates prepared by SLR garbage waste, paper and cardboard recycling, and general recycling will each be collected at a frequency of three times per week. Detailed operational waste management, including the location and design of the waste storage area, will be undertaken prior to the issue of a Construction Certificate in accordance with the measures in the Waste Management Plan.

5.17 Construction Impact

A detailed Construction and Environmental Management Plan (CEMP) will be prepared for the development prior to the issue of a Construction Certificate and once a builder has been engaged. The detailed CEMP will outline the environmental management practices and procedures to be followed during the construction of the works to ensure that no adverse environmental impacts result during construction, including:

- General Site Issues – to ensure all management procedures operate effectively.
- Waste – to ensure that development and ongoing management reduce waste generation and maximise appropriate use of recycled or recyclable materials.
- Traffic and Access – to minimise disruption to roads and road users.
- Air Quality – to minimise dust during construction and result in no overall change to the existing air quality.
- Noise and Vibration – to minimise the impact of construction noise on surrounding land uses.
- Erosion, Sedimentation and Water Quality – to protect the soil from erosion and sedimentation caused by construction works.
- Contaminated Soils – to limit exposure to contaminated soils during construction works.
- Flora and Fauna – to minimise impacts to flora and fauna.
- Groundwater – to ensure the protection of groundwater.
- Utilities and Services – to avoid damage to any existing utilities and services.
- Easement Restrictions – to avoid risk to health and safety of all construction workers within Endeavour Energy easements encompassing overhead transmission lines and Transgrid exclusion zone to the temporary power poles.

In addition, the CEMP may also include the roles and responsibilities of personnel, incident management procedures, construction hours and procedures to report information to relevant regulatory authorities.

6.0 Mitigation Measures

The collective measures required to mitigate the impacts associated with the proposed works are detailed in **Table 9** below. These measures have been derived from the previous assessment in **Section 5.0** and detailed in the appended consultants' reports.

Table 9 Mitigation Measures

Mitigation Measures

Construction Impacts

- A detailed Construction Management Plan is to be prepared prior to the issue of a Construction Certificate.

Bushfire Risk

- The following ember protection measures are to be included within the design and construction of the buildings:
 - Weepholes, vents and openable portions of windows be screened against the entry of embers with steel mesh with maximum aperture of 2 mm;
 - Weather strips to external doors or similar measure to prevent the entry of embers through gaps greater than 3 mm; and
 - Nylon brush seals around roller doors or similar measure to prevent the entry of embers through gaps greater than 3 mm.
- Landscaping to be maintained in perpetuity to the detailed specifications in Section 3 of the Bushfire Protection Assessment at **Appendix J**.
- An Emergency and Evacuation Plan to be prepared consistent with RFS guides titled Preparation of Emergency/Evacuation Plan.

Traffic Impacts

- It is anticipated that full design compliance with the relevant Australian Standards would form a standard Condition of Consent further to approval, which will also provide for any minor design changes if required.

Construction Acoustic Impact

Scheduling Phase:

- Wherever possible, highly noisy intensive works should only be undertaken during the following hours, unless otherwise assessed and justified:
 - 7 am to 6 pm Mondays to Fridays, inclusive; and
 - 8 am to 1 pm Saturdays; and
 - At no time on Sundays or public holidays.
- Provide respite periods when noisy works are undertaken outside standard hours of construction or during periods where high noise impacts are likely.
- Carry out community consultation to determine the need and frequency of respite periods, if necessary.
- Avoid loading and unloading of materials / deliveries outside of daytime hours.

Site Layout:

- Site entry and exit points should be located as far as possible from sensitive receivers.
- Compounds and work areas should be designed to as one-way to minimise the need for vehicles to reverse.
- Work compounds, parking areas, equipment and stockpiles should be positioned away from noise-sensitive locations and/or in shielded locations.
- Trucks should not idle near to residential receivers.
- Stationary sources of noise, such as generators, should be located away from sensitive receivers.

Contractor Management:

- Training should be provided to project personnel, including relevant sub-contractors, on noise and vibration requirements and the location of sensitive receivers during inductions and toolbox talks.
- Delivery vehicles should be fitted with straps rather than chains for unloading, wherever possible.
- Truck drivers should avoid compression braking as far as practicable.
- Where night-time works are required, trucks should use broadband reversing alarms.

Noise Source Mitigation:

- Use the minimum sized equipment necessary to complete the work and where possible, use alternative, low-impact construction techniques.

Mitigation Measures

- Power tools should use mains power where possible rather than generators.
- Shut down machinery, including generators, when not in operation.
- Avoid dropping materials from a height and dampen or line metal trays, as necessary.
- Ensure equipment is operated in the correct manner.
- All equipment should be appropriately maintained and fitted with noise control devices, where practicable, including acoustic lining of engine bays and air intake / discharge silencers, etc.
- Where possible, use dampened 'city' bits on jackhammers and rock breakers.

Community Consultation:

- Provide appropriate notice on the Bringelly Road Business Hub website prior to starting works.
- Provide signage with a 24 hour contact number.
- Where there are complaints regarding noise, review and implement additional control measures, where feasible and reasonable.

Monitoring:

Conduct noise and/or vibration monitoring in response to any valid complaints received.

Air Quality

Communications:

- Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary. This may be the environment manager/engineer or the site manager.
- Display the head or regional office contact information.
- Develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the Local Authority.

Site Management:

- 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 offsite, and the action taken to resolve the situation in the log book.

Monitoring:

- Perform 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. This should include regular dust soiling checks of surfaces such as street furniture, cars and window sills within 100 m of site boundary.
- 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.
- Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.

Preparing and Maintaining the Site:

- 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.
- Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period.
- Avoid site runoff of water or mud.
- 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.
- Cover, seed or fence stockpiles to prevent wind erosion.

Operating Vehicle/Machinery and Sustainable Travel:

- Ensure all on-road vehicles comply with relevant vehicle emission standards, where applicable.
-

Mitigation Measures

- 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.
- Impose and signpost a maximum-speed-limit of 20 km/h on surfaced and 10 km/h on unsurfaced haul roads and work areas.

Operations:

- Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems.
- 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.
- Minimise drop heights from loading shovels and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.
- Ensure equipment is readily available on site to clean any dry spillages, and clean up
- spillages as soon as reasonably practicable after the event using wet cleaning methods.

Waste Management:

- Avoid bonfires and burning of waste materials.

Construction:

- Avoid scabbling (roughening of concrete surfaces) if possible.
- Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.

Trackout:

- Use water-assisted dust sweeper(s) on the access and local roads to remove, as necessary, any material tracked out of the site.
- Avoid dry sweeping of large areas.
- Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.
- Record all inspections of haul routes and any subsequent action in a site log book. Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).

Waste:

- During the construction phase, a qualified and certified contractor should be engaged to remove all contaminated or hazardous materials, for example, asbestos, and dispose of all contaminated or hazardous waste at an appropriately licenced facility.
- Packing waste to be returned to the suppliers where possible. Standard pallets are recommended to be returned to their owners and non-standard and broken pallets are to be stockpiled and collected as required by a private waste contractor.
- The architectural drawings (at **Appendix B**) should be updated to show the anticipated specifications for a waste collection room.

Social Impact

- Ongoing engagement measures be adhered to consistent with Section 4 of the Engagement Report submitted at **Appendix D**.

7.0 Justification of the Proposal

In general, investment in major projects can only be justified if the benefits of doing so exceed the costs. Such an assessment must consider all costs and benefits, and not simply those that can be easily quantified. As a result, the EP&A Act specifies that such a justification must be made having regard to biophysical, economic and social considerations and the principles of ecologically sustainable development.

This means that the decision on whether a project can proceed or not needs to be made in the full knowledge of its effects, both positive and negative, whether those impacts can be quantified or not.

The proposed development involves the development of a temperature controlled warehouse facility in accordance with the approved Concept Plan. The assessment must therefore focus on the identification and appraisal of the effects of the proposed change over the site's existing condition.

Various components of the biophysical, social and economic environments have been examined in this EIS and are summarised below.

7.1 Social and Economic

The proposed development will have a number of economic benefits, including that it will:

- result in the direct provision of approximately 153 jobs in the construction phase of the project.
- result in the direct provision of approximately 187 jobs on an ongoing basis, contributing to the quantity and diversity of employment within the future Western City.
- will deliver industrial development in a location which benefits from access to substantial surrounding infrastructure, including access to the M5 and M7 Motorways.
- form part of the Bringelly Road Business Hub, which will deliver a range of economic benefits to the surrounding area, and South Western Sydney at a regional scale.

The proposed development will also not result in any adverse social impacts at the site or its surrounds. The proposed development will result in the continued activation of the Bringelly Road Business Hub. A substantial pre and post submission consultation program has additionally been undertaken and committed to at **Appendix D**. The following additional points are noted in regards to the social impacts of the development:

- The proposal comprises the continued development of the Bringelly Road Business Hub in accordance with SSD 6324.
- The proposal comprises a light industrial use which has been demonstrated as being compatible with the surrounding area.
- The proposal has been designed to support the ongoing viability of Western Sydney Parklands, which is a key public asset with substantial social benefits to Western Sydney.
- A detailed impacts analysis has been undertaken to ensure that the development does not result in any adverse impacts to any surrounding residents.

On this basis, the proposed development is considered appropriate on the grounds of social and economic impact. A Social and Economic Impact Statement is submitted as **Appendix Q**.

7.2 Biophysical

The environmental impact assessment of the proposed development has demonstrated that:

- The proposal would not have any unjustified effect on threatened species, populations or ecological communities or their habitats arising from the proposed development at the site.
- The proposal will not result in any undue impacts on the surrounding environment, including air quality, bushfire, noise, waste or stormwater quality.

7.3 Ecologically Sustainable Development

The EP&A Regulation lists 4 principles of ecologically sustainable development to be considered in assessing a project. They are:

- The precautionary principle
- Intergenerational equity
- Conservation of biological diversity and ecological integrity
- Improved valuation and pricing of environmental resources

An analysis of these principles follows.

Precautionary Principle

The precautionary principle is utilised when uncertainty exists about potential environmental impacts. It provides that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. The precautionary principle requires careful evaluation of potential environmental impacts in order to avoid, wherever practicable, serious or irreversible damage to the environment.

This EIS has not identified any serious threat of irreversible damage to the environment and therefore the precautionary principle is not relevant to the proposal.

Intergenerational Equity

Inter-generational equity is concerned with ensuring that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations. The proposal has been designed to benefit both the existing and future generations by:

- Securing funding for the ongoing management and improvement of the future environmental, recreational and sporting facilities and requirements of the Western Sydney Parklands.
- Implementing safeguards and management measures to protect environmental values.
- Facilitating the creation of job opportunities in the Western City, in proximity to infrastructure and existing populations.
- Ensuring the delivery of high quality public domain and amenity within and around the site.
- Providing sustainable initiatives on-site including:
 - Solar panels for energy supply.
 - Rainwater harvesting for toilets and garden irrigation.
 - Low energy lighting.

The proposal has integrated short and long-term social, financial and environmental considerations so that any foreseeable impacts are not left to be addressed by future generations. Issues with potential long term implications such as waste disposal would be avoided and/or minimised through construction planning and the application of safeguards and management measures described in this EIS and the appended technical reports.

Conservation of biological diversity and ecological integrity

The principle of biological diversity upholds that the conservation of biological diversity and ecological integrity should be a fundamental consideration. The proposal would not have any significant effect on the biological diversity and ecological integrity of the study area.

Improved valuation, pricing and incentive mechanisms

The principles of improved valuation and pricing of environmental resources requires consideration of all environmental resources which may be affected by a proposal, including air, water, land and living things. Mitigation measures for avoiding, reusing, recycling and managing waste during construction and operation would be implemented to ensure resources are used responsibly in the first instance. Additional measures will be

implemented to ensure no environmental resources in the locality are adversely impacted during the construction or operational phases.

8.0 Conclusion

The Environmental Impact Statement (EIS) has been prepared to consider the environmental, social and economic impacts of the proposed Temperature Controlled Warehouse Facility, which will form a key part of the Bringelly Road Business Hub. The EIS has addressed the issues outlined in the SEARs (**Appendix A**) and accords with Schedule 2 of the EP&A Regulation.

Having regarded the biophysical, economic and social considerations, including the principles of ecologically sustainable development, the carrying out of the project is justified for the following reasons:

- The detailed design of the project has been demonstrated to be generally consistent with the Concept Approval for the Bringelly Road Business Hub.
- The proposed development is permissible with consent and meets all requirements of the relevant planning controls applicable to the site.
- The development directly contributes to a variety of different jobs in Western Sydney, and will have a lasting economic impact on the surrounding area.
- The environmental impacts associated with the construction and operation of the ESR Facility are minor can be appropriately mitigated.

Overall, the application facilitates the delivery of the Bringelly Road Business Hub as envisioned by the approved Concept Plan. This will provide a significant public benefit to the wider community by securing funding for the ongoing management and improvement of the recreation and sporting facilities of the Parklands.

Given the merits described above it is requested that the application be approved.