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05/12/2018



Jim Murray

05/12/2018

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VERSION NO.	DATE OF ISSUE	REVISION BY	APPROVED BY
1	20/11/18	PM	JM
2	23/11/18	PM	JM
3	26/11/18	PM	JM
4	05/12/18	PM	JM

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CIP

Statement of Validity

Development Application Details	
Applicant name	CIP/CH (Bringelly) Pty Ltd
Applicant address	Suite 59, Jones Bay Wharf 26-32 Pirrama Road PYRMONT NSW
Land to be developed	Lot 10-11 DP 29104
Proposed development	New warehouse and distribution building as described in Section 4.0 of this Environmental Impact Statement
Prepared by	
Name	James Murray
Qualifications	BA, MURP
Address	173 Sussex Street, Sydney
In respect of	State Significant Development - Development Application
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	James Murray
Date	5/12/2018

1.0 Executive Summary

Purpose of this Report

This submission to the Department of Planning and Environment (the Department) comprises an amended Environmental Impact Statement (EIS) for a Development Application (DA) under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). It relates to the proposed Steelforce development at the Bringelly Road Business Hub.

This amended EIS is submitted to the Department of Planning and Environment with accompanying documentation pursuant to Clause 55 of the *Environmental Planning and Assessment Regulation 2000*. The previously planned tenant (Nulon Motor Oils), whose operations informed the original application, will no longer occupy the site. Therefore SSD 8900 has been amended to reflect the requirements of a new tenant.

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 NSW Department of Planning and Environment 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 14 November 2017. Accordingly, the SEARs were issued on 13 December 2017. Although the proposed development has been amended, the SEARs are still relevant and applicable, and this submission remains in accordance with the Department'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 Development Application (DA) seeks approval for the detailed development and construction of a warehouse on (Lot 8) of the Bringelly Road Business Hub. It includes a warehouse and distribution facility, ancillary office, staff parking space, and loading areas.

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. This application relates to the proposed warehouse and distribution facility, and is located on Lot 8, at the eastern boundary of the Bringelly Road Business Hub.

Planning Context

Section 6.0 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 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 CIP/CH (Bringelly) Pty Ltd (CIP/CH) and the proposed tenant to manage and minimise potential impacts arising from the development.

The previous EIS and response to submissions comprehensively addressed the environmental assessment requirements. The amended EIS and supporting documentation have been revised where relevant to reflect the specifics of the proposed warehouse and distribution facility.

The key issues related to appropriate environmental management practices during the physical construction and operation of the facility, are assessed and addressed within the preliminary Environmental Management Plan located at **Appendix O**.

Conclusion and Justification

The amended EIS addresses the SEARs, and the proposal provides for a light industrial facility to store and distribute steel products (i.e. steel beams). 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.

2.0 Introduction

This amended Environmental Impact Statement (EIS) is submitted to the Department of Planning and Environment, pursuant to clause 55 of the *Environmental Planning and Assessment Regulation 2000*, and 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*. This DA is subsequent to State Significant Development (SSD) Concept Approval 6324. The Development Consent for SSD 6324 issued by the NSW Department of Planning and Environment does not delegate the assessment and determination of future detailed DAs to another consent authority. Therefore, the proposed development is SSD pursuant to section 89D(2) of the EP & A Act. The report has been prepared by Ethos Urban on behalf of CIP/CH (Bringelly) Pty Ltd (CIP/CH) and is informed by the Architectural Drawings provided by CIP (see **Appendix A**) and other supporting technical information appended to the report (see Table of Contents).

This amended 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 B**. While the SEARs were prepared to assess the impacts of a motor oil blending facility, they are still relevant and applicable to enable a complete assessment of the amended proposal. This amended EIS should be read in conjunction with the supporting information and plans appended to and accompanying this report.

2.1 Overview of Proposed Development

This Development Application (DA) seeks approval for the detailed development and construction of a warehouse and distribution facility on Lot 8 of the Bringelly Road Business Hub, comprising:

- 10,600m² warehouse facility, comprising the following operations:
 - storage, dispatch and distribution; and
 - 600m² of ancillary office space;
 - 48 visitor and staff parking spaces (including 12 contingent spaces at the rear);
- Identification signage; and
- Associated landscaping and infrastructure work.

A concurrent modification under Section 4.55 (1A) of the EP & A Act is submitted to amend the western subdivision boundary of Lots 6 and 8 (refer to the subdivision plan at **Appendix D**).

2.2 Background to the Development

Development consent SSD 6324 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**.



Figure 1 – Concept Approval Site Plan

Source: JBA

The development consent 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.

2.2.1 SSD 6324 MOD 1 and MOD 2

SSD 6324 has been modified twice:

- A section 96(1A) modification (SSD 6324 MOD 1) was granted consent by the Department on 14 April 2016. MOD 1 amended the minimum car parking rates for large format retail development.
- A section 4.55 (1A) modification (formerly known as a 96 (1A) modification) was granted consent by the Department on 15 August 2018 for minor realignments to the approved subdivision boundaries between Lots 4, 6 and 9 and to rename part of Lot 8 to Lot 9. This modification was submitted concurrently with the original lodgement of SSD 8900.

2.3 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.

2.4 Analysis of Alternatives

2.4.1 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.

2.4.2 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 site was selected on the basis that it is already cut off from the main body of the Parklands, its location and visibility along Bringelly Road.

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. This is the highest and best use of the land when considering the context of the site, environmental land use constraints and opportunities. The business uses also respond to the needs of the surrounding community whilst limiting any impact on regional centres.

The business uses were derived from the Parklands Plan of Management and are subject to Concept plan approval. Therefore, developing the site for alternative uses 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.

2.5 Secretary's Requirements

In accordance with section 89G of the EP&A Act, the Secretary of the Department of Planning and Environment (the Department) issued the requirements for the preparation of the EIS on 13 December 2017. A copy of the Secretary's Environmental Assessment Requirements (SEARs) is included at **Appendix B**. The Department have confirmed that the SEARs outlined below are still applicable to amended development proposal.

Table 1 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 1 – Secretary's Requirements

Requirement	Location in Environmental Assessment
General	
<p>The Environmental Impact Statement (EIS) must meet the minimum form and content requirements in clauses 6 and 7 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000. In addition, the EIS must include:</p> <ul style="list-style-type: none"> • a detailed description of the development, including: <ul style="list-style-type: none"> – a description of the proposed operation (with diagrams) incorporating a description of the proposed delivery, storage, blending, bottling, packaging and distribution operations; – the need and justification for the proposed development; – a description of feasible options within the development which may include a layout options analysis; – likely staging of the development; – likely interactions between the development and any existing, approved and proposed developments in the vicinity of the site; – plans of any proposed works with details of the proposed setbacks, site coverage, car parking, landscaped areas; – 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; 	Throughout Environmental Impact Statement
<ul style="list-style-type: none"> • consideration of the conditions of the development consent SSD 6324; 	Section 6.2
<ul style="list-style-type: none"> • consideration of all relevant environmental planning instruments, including identification and justification of any inconsistencies with these instruments; 	Section 6.1
<ul style="list-style-type: none"> • a risk assessment of any potential environmental impacts of the development, identifying the issues for further assessment; 	Throughout Environmental Impact Statement
<ul style="list-style-type: none"> • a detailed assessment, where relevant, of the key issues below, and any other potential significant issues identified in the risk assessment, which must include: <ul style="list-style-type: none"> – a description of the existing environment, including sufficient baseline data; – an assessment of the potential impacts of the development, including any cumulative impacts due to other development in the vicinity; and – a description of the measures that would be implemented to avoid, minimise and if necessary, offset the predicted potential impacts, including strategies for adaptive management and/or contingency plans to manage any significant risks to the environment; and – a consolidated summary of all the proposed environmental management and monitoring measures, highlighting commitments included in the EIS. 	Throughout Environmental Impact Statement

Requirement	Location in Environmental Assessment	
The EIS must also be accompanied by a report from a qualified quantity surveyor providing: <ul style="list-style-type: none"> - a detailed calculation of the Capital Investment Value (CIV) (as defined in clause 3 of the Environmental Planning and Assessment Regulation 2000) of the development, including details of all assumptions and components from which the CIV calculation is derived; - an estimate of the jobs that will be created by the development during the construction and operational phases of the development; and - certification that the information provided is accurate at the date of preparation. 	Provided with the application	
Key Issues	Report / EIS	Technical Study
The EIS must include an assessment of the 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:		
Strategic Context	Section 6.1	N/A
Economic Impact	Section 8.1	N/A
Traffic and Access	Section 6.4	Appendix E
Hazards and Risk	Section 6.6	Appendix F
Noise and Vibration	Section 6.7	Appendix G
Urban Design	Section 6.3	Appendix H
Bushfire	Section 6.11	Appendix K
Soil and Water	Section 6.12	Appendix L & Q
Biodiversity	Section 6.13	N/A
Heritage	Section 6.14	N/A
Waste Management	Section 6.15	Appendix O
Air Quality	Section 6.16	Appendix M
Ecologically Sustainable Development	Section 8.3	N/A
Regional Open Space Impacts	Section 2.4	N/A
Layout and Urban Design	Section 6.3	Appendix H
Contamination	Section 6.12	N/A
Flora and Fauna	Section 6.13	N/A
Infrastructure and Utilities	Section 4.9	N/A
Staging	Section 4.10	Appendix P
Contributions	Section 6.2	N/A
Flooding, Stormwater/Water Management	Section 6.12	Appendix L & Q
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 <i>Environmental Planning and Assessment Regulation 2000</i> . Those documents should be included as part of the EIS rather than as separate documents.		Appendix A
Consultation		
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: <ul style="list-style-type: none"> • Western Sydney Parklands Trust • Liverpool City Council; • Roads and Maritime Services; 	Section 5.0	N/A

Requirement	Location in Environmental Assessment	
<ul style="list-style-type: none"> • Transport for New South Wales; • Office of Environment and Heritage; • Environment Protection Authority; • Sydney Water; • Water NSW; • Rural Fire Service; and • any 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 those issues. Where amendments have not been made to address an issue, a short explanation should be provided.</p>		

3.0 Site Analysis

3.1 Site Location and Context

The wider Bringelly Road Business Hub site is situated in the southern section of the Western Sydney Parklands, to the north of New Bringelly Road. Stuart Road marks the site's northern boundary. The site forms part of the Western Sydney Parklands and is located within the Blacktown Local Government Area. The South-West Rail Link is located to the south of the Site, with Leppington Station approximately 2.5km to the west.

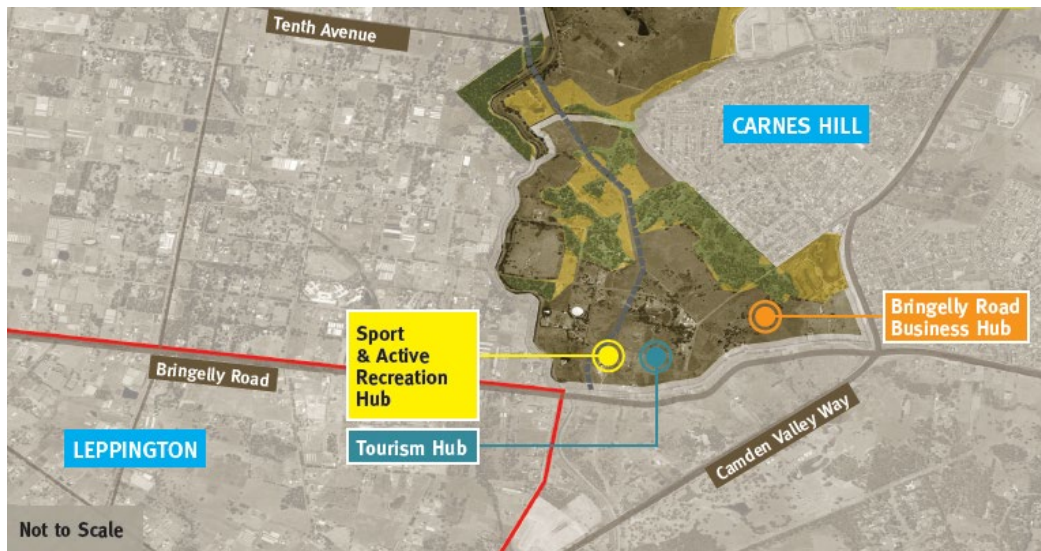


Figure 2 – Western Sydney Park Lands

Source: Plan of Management 2020 - Supplement – March 2014

The Steelforce facility is proposed on Lot 8 which is the eastern most lot within the Business Hub, within the Liverpool Local Government Area (see **Figure 1**). The site is bounded by Bedwell Park to the north, undeveloped land to the east, the Lot 6 of the proposed Bringelly Road Business Hub to the west, and Old Bringelly Road to the south (Skyline Crescent).

The site is owned by the Western Sydney Parkland Trust (the Trust) and CIP/CH have entered a development management agreement with the Trust to develop the land.

This application relates to Lot 8 of the approved Bringelly Road Business Hub which is the second lot that will be developed. It is situated at the eastern most lot and has an area of approximately 22,345 m² (refer to **Appendix C**). The lot is proposed to be developed for light industrial purposes (warehouse and distribution) in accordance with the approved Concept Plan (SSDA 6324).

The site consists of open grass lands and clustered vegetation in the north, consistent with its position within the Western Sydney Parklands (see **Figure 3**).



LEGEND

 Subject Site

 NOT TO SCALE

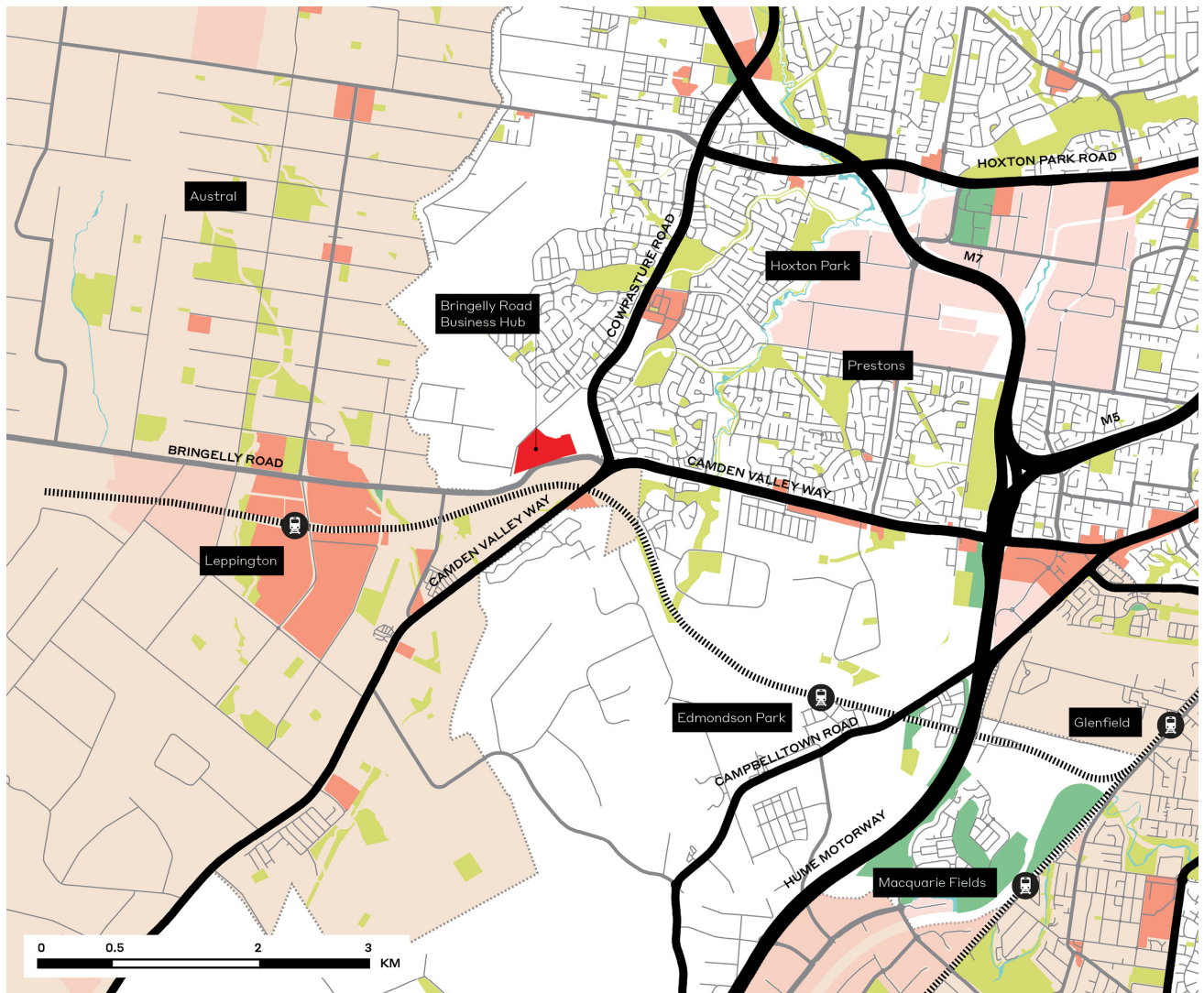
Figure 3 - Site Plan

Source: Ethos Urban

3.2 Surrounding Development

The surrounding uses comprise:

- the adjoining rural residential property to the east with access provided by the old Bringelly Road (Skyline Crescent) and the Horningsea Park residential area on the eastern side of Cowpasture Road;
- the rural residential lands to the west and south;
- the Carnes Hill residential area and Western Sydney Parklands extending to the north; and
- the new Edmondson Park residential area to the south-east.



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

Source: Ethos Urban

4.0 Description of the Development

This chapter of the report provides a detailed description of the proposed development based on the Architectural Plans prepared by CIP/CH and included at **Appendix A**.

This application seeks approval for the construction and use of a new 10,600m² facility on Lot 8 of the Bringelly Road Business Hub, including:

- 10,000m² of warehousing area;
- 600m² of ancillary office space split over two levels;
- 48 customer and staff parking spaces;
- Identification signage; and
- Associated landscaping and infrastructure work.

The warehouse will be used for the following activities:

- Storage of structural steel;
- cutting of steel products to enable transportation (e.g. beams);
- dispatch and distribution; and
- ancillary office administration.

The development design principles have been determined by the Urban Design Guidelines of the Concept Approval (SSD 6324).

4.1 Numerical Overview

The key numeric development information is summarised in **Table 2**. The table includes the original proposal for comparison.

Table 2 – Key development information

Component	Amended Proposal	Original Proposal
Site area	22,345m ²	21,967m ²
GFA		
• Warehouse	• 10,000m ²	• 9,210m ²
• Office	• 600m ²	• 800m ²
• Bulk store	• 0m ²	• 686m ²
Maximum Height	13.7m	13.7m
Boundary Setbacks		
• North	• 18.2m	• 15m
• South	• 15m	• 15m
• East	• 13m	• 11m
• West	• 32m	• 15.7m
Car spaces	48	70
Site coverage (Lot 8)	48%	49%

4.2 Demolition / Site Preparation / Bulk Earthworks / Remediation

Site preparation work 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 to integrate with the above early works.

Minor earthworks will be required over the site to facilitate the construction of the new warehouse building, following infrastructure works that will be completed as part of the overall estate works for the Bringelly Road Business Hub Estate. As part of the estate works, a pad site will be provided for this site in accordance with Civil Drawings at **Appendix L**.

4.3 Built Form

The proposed facility comprises a large, single level warehouse building with a maximum height of 13.7m. The main warehouse area is rectangular in shape and includes an ancillary office in the south-east corner of the building, split between ground level and a mezzanine level. Truck loading areas and an open hardstand area for circulation is located on the western side of the building and at-grade parking is located between the warehouse and the southern boundary.

A photomontage of the proposed development is shown at **Figure 5** and at **Appendix J**.



Figure 5 – Indicative photomontage of proposed development – looking north from Skyline Crescent

Source: CIP

External Materials and Finishes

The proposal incorporates a variety of external finishes and materials. The main warehouse facades predominantly comprise a mix of colorbond cladding and yellow pre-cast concrete panels, and roller shutter doors along the western elevation. The office located at the south-eastern corner of the building is made of aluminium cladding with areas of tinted glazing.

Full details of the proposed external finishes are included within the Architectural Plans included at **Appendix A**.

4.4 Landscaping and Public Domain

Landscape Plans prepared by Habit8 are included at **Appendix I**, and an extract of the landscape works are shown in **Figure 6**. Key features of the proposed landscaping include:

- Buffer/screening planting along the site boundaries;
- Shade trees and hedging around the car parking area;
- Screen hedging and large native trees separating the car park from the loading and truck circulation areas; and
- Feature entry trees for staff office entry, and truck entry.



Figure 6 – Extract of landscape plan

Source: Habit8

The proposal generally comprises landscape buffer planting and boundary hedging, along the site boundaries and within the setbacks.

4.5 Pedestrian Access

Pedestrian access to the warehouse is provided from the carpark via the main office at the south-eastern corner of the building. A feature tree is provided to mark this as the main pedestrian entrance.

4.6 Vehicular Access

Vehicular access to the site is available from Skyline Crescent with separate entrance and exit points provided for cars and trucks. Truck ingress and egress points are located on either side of the site, adjacent the eastern and western boundaries, and are connected by a hardstand parking and circulation area surrounding the warehouse.

The proposed vehicle access arrangements for the development comprise:

- A 12m wide ingress driveway located at the eastern site boundary for truck access
- A 12m wide egress driveway located at the western site boundary for truck access
- A 6m wide combined ingress/egress driveway located in the western part of the site frontage for car park access

These driveways will accord with AS2890.1 and 2 design requirements, being located where good sight distances will be available.

4.7 Parking

Between the two truck access points is a two-directional car park, whereby cars enter and exit the site adjacent truck access driveway on the westernmost side of the front boundary. This car park includes 38 staff and visitor parking spaces, including one accessible parking space. Another 12 parking spaces are located at the rear of the warehouse as future contingency.

4.8 Operation Details

This development application (DA) seeks approval for the detailed development and construction of a light industrial facility to accommodate steel trading operations on Lot 8 of the Bringelly Road Business Hub.

The core operation is the importation and distribution of steel products to the Greater Sydney market and will include:

- Bulk delivery and storage of structural steel;
- Cutting of steel products to required lengths (e.g. beams);
- Dispatch and distribution; and
- Ancillary office administration.

The facility is proposed to be an office, and distribution centre for Steel force and will accommodate approximately 38 jobs on the site.

The facility operating hours are:

- Warehouse facility: 24 hours per day - Monday to Friday, and 6:00 am – 3:00 pm - Saturday.
- Office: 8:00 am – 5.30 pm - Monday to Friday.

4.9 Infrastructure and Services

The approved early works package (in accordance with SSD 6324) provides for the necessary infrastructure and services to accommodate the proposed development of Lot 8. This includes:

- Bulk and detailed earthworks;
- Construction of the access road;
- Stormwater management infrastructure; and
- Civil engineering works.

Consultation with the relevant electricity and water service authorities has identified that the site likely has sufficient supply and connection opportunities to service the development.

4.10 Staging

The proposed development will be the first or second stage of the development of Bringelly Road Business Park, a development application for the neighbouring Lot 6 is also under assessment by the DPE (SSD 18_9511).

The development will be carried out in accordance with the Staging Plan included at **Appendix P**.

5.0 Consultation

The original EIS for the motor oil blending facility was placed on public exhibition between the 1st February 2018 and 2nd March 2018 and received 12 agency submissions and 65 public submissions (including 2 petitions). The fundamental issues raised in the submissions were the permissibility of the use and the perceived hazards and risks of the proposed operations. The previous tenant undertook a comprehensive consultation and engagement exercise that is outlined in the “Community Engagement Outcomes Report” that was submitted as part of the response to submissions. The response to submissions provided a comprehensive analysis of the issues raised during the exhibition period.

The proposed operations of the amended proposal involve storing, cutting and distributing steel products. Many of the issues raised in the submissions are no longer relevant as they related to the specific use and perceived hazardous operations of the previous application.

The amended EIS is consistent with the fundamental parameters of the Concept Approval. Notwithstanding, the applicant will consider any further submissions received during the assessment process.

6.0 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 2.5**). As discussed above, the SEARs that were prepared for the motor oil blending facility are comprehensive and are adequate to enable a thorough assessment of the amended proposal.

The Mitigation Measures at **Section 7.0** complement the findings of this section.

6.1 Relevant EPIs, Policies and Guidelines

The relevant strategies, environmental planning instruments, policies and guidelines as set out in the SEARs are addressed in **Table 3**.

Table 3 – Summary of consistency with relevant Strategies, EPIs, Policies and Guidelines

Instrument/Strategy	Comments
Strategic Plans	
A Plan for Growing Sydney and Draft West Central District Plan	The proposal is consistent with <i>A Plan for Growing Sydney</i> and the <i>Western City District Plan</i> , in that it: <ul style="list-style-type: none"> will assist in the implementation of the Western Sydney Parklands Plan of Management; provide jobs close to existing residential areas; support investment and contribute to employment generating land uses in Western Sydney; protects the natural environment by providing a sustainable source of funding for the Parklands and managing environmental impacts of the project.
NSW Long Term Transport Master Plan 2012	The proposal is consistent with the approved Concept Plan for the site, which assessed the transport impacts of a business hub in this location. The detailed design of the development remains consistent with the key objectives of the NSW Long Term Transport Master Plan in that it: <ul style="list-style-type: none"> will not unduly impact on Bringelly Road or Camden Valley Way; does not impact connections to the Sydney CBD; provides services to meet the day to day needs of the local community and jobs close to home; and sustains growth in the greater Sydney area.
Sydney's Walking Future	The proposal is consistent with the three pillars of <i>Sydney's Walking Future</i> in that it provides new footpaths around the site to increase connectivity with surrounding development and the Parklands.
Sydney's Cycling Future	The proposal is consistent with <i>Sydney's Cycling Future</i> in that it promotes cycling by providing end of trip facilities (including bicycle parking and change rooms) and safe paths of travel in and around the site.
Sydney's Bus Future	The proposal is serviced by an existing bus stop along Joshua Moore Drive to the north of the Site. Bus stops that will be provided in the bus bays located on both sides of Bringelly Road adjacent to the Business Hub access intersections. The bus services will provide connections to the surrounding residential areas, the railway stations at Leppington and Liverpool and inter-connection with other regional bus services. These stops will benefit staff and visitors of the centre. Information on bus services will be provided to encourage the use of this service.
Western Sydney Parklands Plan of Management 2020	The WSPT developed the Western Sydney Parklands Plan of Management to guide the management of the Parklands. The Plan of Management establishes the principle of utilising 2% of the Parklands for business uses in order to generate an ongoing revenue source to implement the initiatives of the management plan. The Bringelly Road Business Hub comprises land set aside for this purpose and this application will facilitate the development of Lot 8 in accordance with this strategy.

Instrument/Strategy	Comments
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"> • 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; • promote and co-ordinate the orderly and economic use and development of land; • protect the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats, and • promote ecologically sustainable development. <p>The proposed development is consistent with Division 4.7 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 criteria within clause 6 and clause 7 of Schedule 2. 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 8.3)</p>
Western Sydney Parklands Act 2006	<p>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 (amongst 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 January 2011. The development supports the objectives of this Plan of Management.</p>
SEPP (Western Sydney Parklands) 2009;	<p>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 8 of Bringelly Road Business Hub. The proposal remains consistent with the Concept Plan and the relevant matters of consideration are addressed in Section 6.0 below.</p>
SEPP 33 - Hazardous and Offensive Development	<p>Refer to Section 6.6. A Dangerous Goods Assessment (see Appendix F) has determined that the proposed development does not meet the threshold, and therefore the development is not potentially hazardous or offensive.</p>
SEPP 55 – Remediation of Land	<p>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.</p>
SEPP (Infrastructure)	<p>The development has a frontage to a classified road (Rooty Hill Road South) and therefore clause 101 of the SEPP applies. The development is traffic generating development as it relates to a commercial premise with over 10,000m² of GFA. The application will therefore be referred to the RMS.</p>
SEPP 64 – Signage and Advertising Structures	<p>Clause 6(1) of the Western Sydney Parklands SEPP excludes the provisions of SEPP 64 for development within the Western Sydney Parklands. Nevertheless, the SEPP has been considered in the positioning of the signage zones along with the Bringelly Road Urban Design Guidelines. Refer to Section 6.8.</p>
Local Planning Instruments and Controls	
Liverpool Local Environmental Plan 2008 and Development Control Plan 2008	<p>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.</p>
Bringelly Road Business Hub Design Guidelines	<p>A summary of the proposals consistency with the Design Guidelines has been undertaken and provided at Appendix H. Variations to, and non-compliance with, the key guidelines highlighted in the table are discussed in the following sections of this environmental assessment.</p>

6.2 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 Stage 1 DA 'cannot be inconsistent' with the original consent. The proposed development is not inconsistent with the Stage 1 consent (SSD 6324) in relation to maximum building height, land uses, gross floor area, building envelopes, parking and loading arrangements. **Table 4** addresses each relevant conditions of SSD 6324.

Table 4- SSD 6324 – Conditions to be met in future development applications

Condition	Response
SCHEDULE 3 - PART A	
A1. Development Description	<p>The proposed development relates to a light industrial warehouse and distribution component of the Bringelly Road Business Hub site.</p> <p>While the description of the development in Schedule 1 does not expressly refer to a warehouse use the approved EIS referred to at Condition A6(a) expressly refers to a proposed "industrial (warehouse and logistics)" use (see SSD 6324 EIS pg. 2 and RTS pg. 2). Further Condition B10 outlines car parking rates for warehouse uses, and condition B11 requires further assessment of noise and vibration impacts associated with future warehouse uses.</p> <p>Warehouse and distribution uses formed part of the terms of approval and are expressly contemplated within the consent.</p>
A2. Obligation to Minimise Harm to the Environment	Refer to Section 7.0 . The proposal implements all reasonable and feasible 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 an early stage of the approved Concept Plan as required by this condition.
A6-A7. Development in Accordance with Plans and Documents	The detailed design of this stage is generally consistent with the referenced structure plans.
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 Concept Approval and maximum GFA for Light Industrial Use.
PART B	
B1-B3. Building Design	<p>Refer to Section 4.3. The proposal is generally consistent with the Updated Site Design Guidelines. A detailed assessment against the requirements of the Design Guideline has been prepared and included within Appendix H.</p> <p>Architectural drawings including all the required details of the design have been prepared by CIP, is provided at Appendix A.</p>

Condition	Response
B4-B5. Landscaping	<p>Landscape Plans have been prepared by Habit8 and included at Appendix I.</p> <p>A detailed compliance with the landscape and public domain principles and development guidelines against the Updated Site Design Guidelines is provided within Appendix H.</p> <p>Landscape buffer planting within the Bedwell Park riparian corridor will be provided as per the requirements, comprising a mixture of complimentary native groundcovers, grasses, shrubs and trees.</p>
B6. Visual Impact	Refer to Section 6.10 . A Visual Impact Assessment has been prepared by CIP and included at Appendix J .
B7-B10. Traffic, Access and Parking	Refer to Section 6.3 . A Traffic and Parking Impact Statement addressing these matters has been prepared by Transport and Traffic Planning Associates and included at Appendix E .
B11. Noise and Vibration	Refer to Section 6.7 . A Noise and Vibration Impact Statement addressing these matters is submitted at Appendix G .
B12. Construction	Refer to Section 6.19 . An Environmental Management Plan is submitted at Appendix O . A Traffic Management Plan is included at Appendix Q .
B13. Developer Contributions	The Department confirmed at the meeting held Tuesday 7 November 2017, that no infrastructure contributions are applicable to this SSDA.
B14. Ecologically Sustainable Development	Refer to Section 8.3 . A BCA Report has been prepared by Mckenzie Group, including as assessment of the provisions of Section J, and is included at Appendix N .
B15. Stormwater	Refer to the civil engineering plans submitted as Appendix L .
B16. Crime Prevention	Refer to Section 6.9.
B17. Bushfire	Refer to Section 6.11 . A Bushfire Protection Assessment has been prepared by Eco Logical and is included at Appendix K .
B18. Disability Access	Refer to Section 6.18 . A BCA Report has been prepared by Mckenzie Group and included at Appendix N .
B19. Building Code of Australia	Refer to Section 6.18 . A BCA Report has been prepared by Mckenzie Group and included at Appendix N .
B20. Waste	Refer to Section 6.15 .
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 signage has been indicated on the plans at Appendix A , and an assessment against SEPP 64 is detailed at Section 6.8 .
B23. Staging Plan	Refer to Section 4.9 . The construction of buildings shall be in accordance with the Staging Plan at Appendix P .
B24. Safety Management Study	N/A – The pipeline does not run through the development lot. A Consultation Report was submitted with the original EIS which includes consultation with Jemena to confirm requirements.
B22. Hazards and Risks	Refer to Section 6.6 . A Dangerous Goods advice notice has been prepared by RiskCon Engineering and is included at Appendix F .
B23. Underground Petroleum Storage System	N/A
B24. Food Outlet	N/A
B25. Utility Services	N/A

6.3 Built Form, Urban Design & 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 reads as a single storey built form and has a maximum building height of 13.7m, which is consistent with the Design Guidelines. The building mass is generally consistent with the approved indicative building envelopes and setbacks contained within the Design Guidelines.

The site is located within an extensive network of regional open space 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 of the at-grade car park. Landscaping across the site utilises passive irrigation to reduce the pressure on the stormwater system and adjacent natural wetlands.

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

6.4 Traffic and Access

A Traffic and Parking Impact Assessment has been prepared by Transport and Traffic Planning Associates (TTPA) and included at **Appendix E**. A summary of the assessment and proposed mitigation measures are provided below.

Traffic Generation

The SSD Traffic Assessment undertaken for the BRBH site envisaged much higher traffic generating uses than warehouse development. TTPA conclude that traffic generation outcome for the revised proposal will be far less than that assessed in the SSD traffic assessment, particularly in the PM peak where the projected outcome is only 10% of what was approved for the site.

The average truck movements will comprise 27 visitations per day for deliveries and dispatches, using the following truck types:

- HRV 1 - 2 per day
- Semi-trailer - 22 per day
- B Double - 1 per week
- Containers - 3 per day

Achieving a sustainable non-car travel mode outcome for the proposed development will be facilitated by:

- The bus stops that will be provided in the bus bays located on both sides of Bringelly Road adjacent to the BRBH access intersections. The bus services will provide connections to the surrounding residential areas, the railway stations at Leppington and Liverpool and inter-connection with other regional bus services.
- The shared path provided along the northern side of Bringelly Road which will connect to the regional bicycle and pedestrian network
- The provision of traffic signals at the Bringelly Road and BRBH access intersection which will incorporate pedestrian and cyclist crossing facilities
- The provision of bicycle parking, lockers and shower facilities

A Green Travel Plan incorporating a Transport Access Guide will be prepared and submitted as part of the Construction Certificate documentation.

There will only be a relatively minor level of servicing required for the developments (i.e. apart from receipt and dispatch movements). Refuse removal will be undertaken by contract vehicles while the expansive hardstand area will adequately provide for the standing of service vehicles.

The assessment undertaken concludes that:

- the proposal is entirely consistent with the traffic analysis undertaken for the SSD (although the traffic generation outcome will be somewhat less)
- the proposal will not have any adverse traffic implications
- the proposed parking provision will be adequate and appropriate for the development and compliant with the SSD criteria
- the proposal will adequately provide for access, internal vehicle circulation and servicing

6.5 Parking

Approval conditions of the Concept Plan SSD 6324 specify minimum parking provision rates for industrial/warehouse uses. The proposed scheme therefore provides the required 48 car spaces.

The operator will have a total workforce on site of 38 persons over 3 shifts. It is proposed to provide 36 spaces including 1 accessible space in the front area with provision for 12 contingent spaces at the rear of the building. As such, the proposed staff and visitor parking provision is considered appropriate.

6.6 Hazards and Risk

The SEARs require the preparation of a Dangerous Goods Assessment pursuant to SEPP 33 to determine whether the risks associated with the development are adequately managed or whether additional assessment is required in the form of a Preliminary Hazard Analysis. RiskCon Engineering have assessed the amended proposal against the relevant thresholds and the proposal is not considered to be hazardous or dangerous and does not necessitate the preparation of a Preliminary Hazard Analysis (refer **Appendix F**).

Based on a review of the site operations, commodities being stored and handled at the site RiskCon Engineering conclude that no materials classified as Dangerous Goods are required in the operations. As no Dangerous Goods are proposed to be used at the site, SEPP 33 does not apply.

6.7 Noise and Vibration

A Noise impact assessment has been prepared by SLR and is included at **Appendix G**. A summary of the assessment and proposed mitigation measures are provided below.

Noise emissions from the operation of the facility have been assessed against the relevant noise assessment criteria including the Environmental Protection Authority (EPA) Industrial Noise Policy (INP).

The report assesses the following noise elements relating to the operation of the proposed industrial warehouse, assessed as the acoustically worst-case of proposed operation hours including goods handling 24 hours on all days of the week:

- Internal warehousing operations within the facility;
- Truck movements within the loading dock areas and on the internal access road;
- Trucks in transit to and from the site along New Bringelly Road;
- Car movements within carpark areas and on the internal access road;
- Cars in transit to and from the site along New Bringelly Road; and
- Loading dock operations.

The residential noise receivers and noise measurement recorders, located to the east, north and west of the Site, are shown in **Figure 7**.

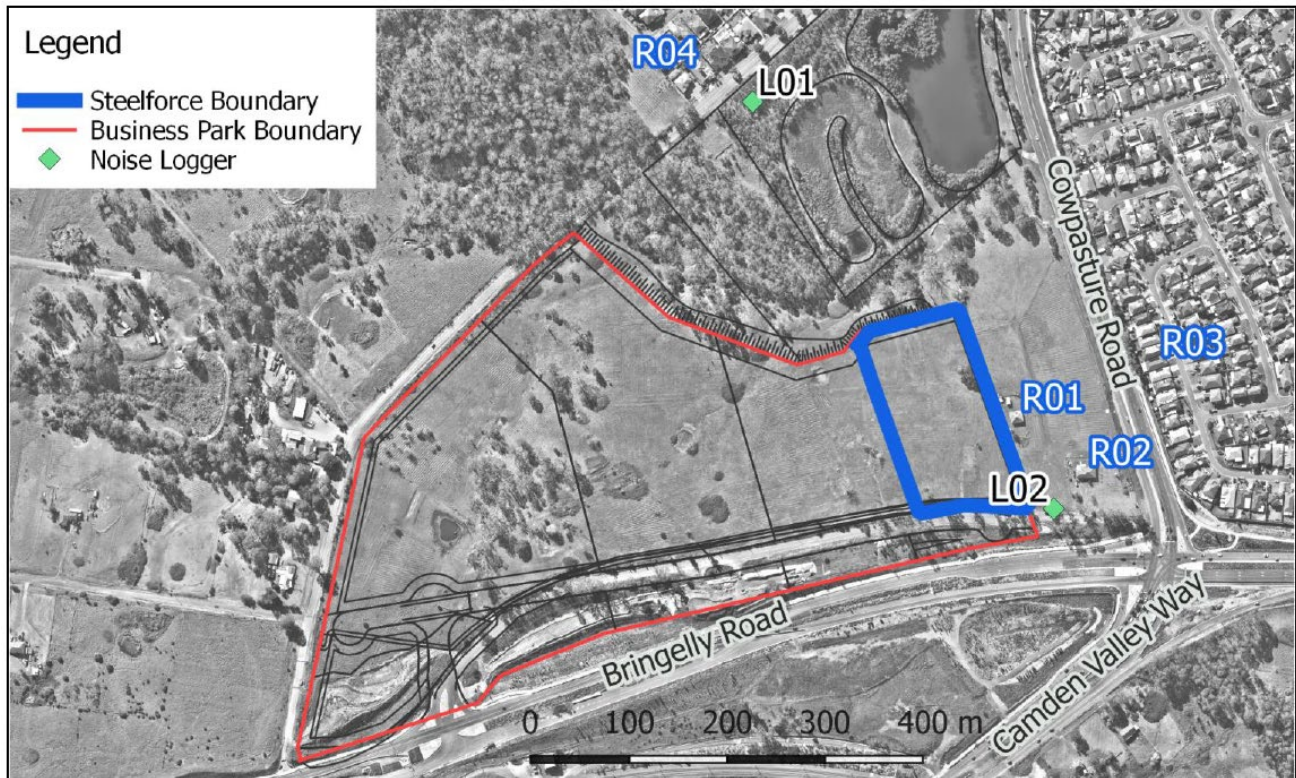


Figure 7 – Site and surrounding noise receivers

Source: Acoustic Logic

Noise impacts from the general operation of the warehouse facility, including vehicular movements and loading operations will not have a significant detrimental impact on the residents within the vicinity of the project site and is acoustically acceptable.

Final details of mechanical plant at the site are not currently determined and as such, the potential noise impacts should be reviewed during detailed design. Compliance with the nominated criteria is expected to be achievable with standard noise attenuation measures.

6.8 Signage

The proposed signage zones are integrated into the design of the built form and are of a scale and character suitable to the context of the site. Clause 16 of the Western Sydney Parklands 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 cover commercial/business signage such as that proposed for the site.

Clause 6 of the Western Sydney Parklands SEPP also turns off the provisions of *State Environmental Planning Policy No 64—Advertising and Signage* in relation to the site. Notwithstanding, the design criteria at Schedule 1 of SEPP 64 has been used as a reference to inform a merit assessment of the proposed signage at **Table 5**.

Table 5 – SEPP 64 Assessment

Assessment Criteria	Comments	Compliance
1 Character of the area		
Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located?	The desired future character of the site is a low scale business park. In accordance with this vision, the Signage zones adopt an appropriate level of signage for the desired future character of the centre. The signage typologies and zones nominated are compatible with the context of the surrounding public domain and residential uses.	Y
Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?	The proposal is consistent with the theme of adjoining proposed warehouse signage (SSDA 9511). The proposal is also consistent with a typical suburban business park and other outdoor advertising visible across the LGA.	Y
2 Special areas		
Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas?	Whilst the site adjoins parklands and residential areas, the proposed signage will not adversely detract from the visual quality of these areas. The site is currently undergoing substantial change as it transitions into a new commercial centre and the proposed signage reflects this new use.	Y
3 Views and vistas		
Does the proposal obscure or compromise important views?	The proposed signage zones are to be located on the façade of the building. This will not obscure or compromise any important views.	Y
Does the proposal dominate the skyline and reduce the quality of vistas?		
Does the proposal respect the viewing rights of other advertisers?	The proposal does not impact upon any other signs in the location and does not obscure the ability to observe any other signage for surrounding areas.	Y
4 Streetscape, setting or landscape		
Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?	The scale, form and proportion of the proposed signage zones and typologies are appropriate for the setting and will contribute to the visual interest and viability of the site.	Y
Does the proposal contribute to the visual interest of the streetscape, setting or landscape?	The proposed signage zones are fully integrated with the quality design of the new building, and will feature a contemporary design that will positively contribute to the streetscape.	Y
Does the proposal reduce clutter by rationalising and simplifying existing advertising?	N/A - the signage relates to a new building. The number of signs proposed ensures minimal visual impact on the streetscape, and helps establish a sense of place with a strong relationship to the public domain. Consistency in the design of the signage and its proportionate size will ensure that the proposal will not result in visual clutter.	N/A
Does the proposal screen unsightliness?	N/A - the proposal does not screen unsightliness, but rather is subservient to the architectural form of the building.	N/A
Does the proposal protrude above buildings, structures or tree canopies in the area or locality?	The proposed signage zones do not protrude above buildings, structures or tree canopies in the area or locality.	Y

Assessment Criteria	Comments	Compliance
Does the proposal require ongoing vegetation management?	The signage does not require ongoing vegetation management.	N/A
5 Site and building		
Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located?	The proposed signage zones are compatible with the scale and proportion of the building. The location and design of each of the signage zones have specifically considered the location and the unique characteristics of the building on which they are located.	Y
Does the proposal respect important features of the site or building, or both?	The signage zones will not dominate the building, but rather achieve a balance between identifying the tenant whilst being subservient to the overall form.	Y
Does the proposal show innovation and imagination in its relationship to the site or building, or both?	The strategy illustrates how signage for the development will not focus on innovation, but rather on what will be effective whilst also being complementary to the building.	Y
6 Associated devices and logos with advertisements and advertising structures		
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?	Lighting devices have been integrated into the overall design of the signage zones/signs. The signs are to be backlit with all necessary cabling being concealed within the sign or signage structure.	Y
7 Illumination		
Would illumination result in unacceptable glare? Would illumination affect safety for pedestrians, vehicles or aircraft?	Illumination of signage will not result in unacceptable glare. Illumination levels will comply with all applicable standards and the proposed signage zones are located at ground level to minimise glare to surrounding uses.	Y
Would illumination detract from the amenity of any residence or other form of accommodation?		
Can the intensity of the illumination be adjusted, if necessary? Is the illumination subject to a curfew?	The intensity of the illumination can be adjusted where necessary, however a curfew is not proposed.	Y
8 Safety		
Would the proposal reduce safety for any public road?	The proposal will not reduce safety for users of public roads given that none of the signs include moving parts. The content and scale of the signs are not such that they will be distracting to road users so as to result in safety impacts.	Y
Would the proposal reduce safety for pedestrians/cyclists?	The location and scale of the proposed signs do not pose any adverse impacts on pedestrian or cyclist safety.	Y
Would the proposal reduce safety for pedestrians, particularly children, by obscuring sightlines from public areas?	The proposed signs will not obscure sightlines from public areas.	Y

6.9 Crime Prevention Through Environmental Design

Crime prevention through environmental design (CPTED) is a situational crime prevention strategy that focuses on the design, planning and structure of the environment. It aims to reduce opportunities from crime by employing design and place management principles that minimise the likelihood of essential crime ingredients. The aims of the CPTED strategy are to influence the design of the buildings and places by:

- increasing the perception of risk to criminals by increasing the possibility of detection, challenge and capture;
- increasing the effort required to commit crime by increasing the time, energy or resources which need to be expended;
- reducing the potential rewards of crime by minimising, removing or concealing 'crime benefits'; and
- removing conditions that create confusion about required norms of behaviour.

Crime statistics obtained from the NSW Bureau of Crime Statistics and Research (BOSCAR) represents criminal incidents recorded by NSW Police. A review of the local statistics found that crime in the surrounding areas of West Hoxton, Leppington and Horningsea Park were medium in all significant categories. The site was mapped as being in close proximity of a crime hotspot relating to breaking and entering a non-dwelling. Hot spots indicate areas of high crime density (number of incidents per 50m by 50m) relative to crime concentrations across NSW.

With the data from the BOSCAR database in mind, and the changing character of the area, NSC had prepared a Security Management Plan and CPTED recommendation for the previous proposal (**Appendix J**). This plan identifies strategies to reduce the risk of crime, which will inform both the detailed design and ongoing operation of the site and include installing CCTV, an electronic access control system, employing night security personnel, using signage for wayfinding and territorial reinforcement, and comprehensive lighting, among other things. These recommendations remain applicable to amended proposal. Accordingly, the proposal is supportable from a crime and safety perspective and can meet the relevant CPTED principles.

6.10 Visual Impact

A Visual Impact Assessment has been prepared by CIP and is included at **Appendix J**. The identified sensitive receivers are located to the east and west of the site. It concludes that the visual impacts of the proposal are consistent with those expected under the Concept Approval and are therefore acceptable.

6.11 Bushfire

A Bushfire Protection Assessment, has been prepared by Eco Logical and is included at **Appendix K**. A summary of the assessment of the proposal in relation to the SEARs requirements for this DA, and relevant Bushfire Conditions of Consent subject to SSD 6324, are outlined below.

It is noted that the Bushfire Protection Assessment (BPA), previously prepared by Eco Logical Australia for the Concept Approval (SSD 6324) dated November 2014, provides an assessment of provision of water supply for firefighting purposes, and the detailed measures to ensure the proposal will not increase the bushfire risk to adjoining lands.

The report assesses the proposed protective measures against the PBP in relation to Asset Protection Zones, construction standard, access, water supply, gas and electric supplies.

The APZ for the Site has been determined in accordance with the requirements of the PBP, and has been provided by the proposed development. The available defendable space is provided by the access arrangements and maintained landscaping (grass seeded area) within the north-west of the subject land.

The proposal will be serviced by a reticulated water supply and meets the *Planning for Bush Fire Protection 2006* (PBP) requirement for the provision of water for firefighting purposes in accordance with Australian Standard 2419.1 – 2005 Fire Hydrant Installations - System Design, Installation and Commissioning (Standards Australia 2005).

Eco Logical note that the development proposal complies with the aim and objectives of PBP for Industrial development. 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;
- Nylon brush seals around roller doors or similar measure to prevent the entry of embers through gaps greater than 3 mm; and
- Landscaping to be managed to Inner Protection Area standards as per Section 3.2 of the Bushfire Protection Assessment report.

The amended proposal is supportable from a bushfire risk perspective.

6.12 Soil and Water

A Civil Engineering Report has been prepared by Costin Roe Consulting and is included at **Appendix L**. This assessment considers whether the proposed development can be suitably accommodated on the greenfield site, and nominates mitigation measures to minimise or prevent environmental impacts. It also provides a detailed response to the SEARs and those matters raised during early consultation with the EPA.

6.12.1 Site Works

Given the existing natural falls and nature of the industrial development that is to be constructed on a vacant greenfill site, retaining walls and batters are required. These will be provided as part of the infrastructure works at boundary locations and will be in the form of landscaped batters or reinforced concrete masonry, masonry faced reinforced earth retaining, pile and shot-crete, or other concrete or masonry type construction. Costin Roe Consulting confirms that this strategy for the site provides a best fit solution within the constraints of the existing landform, structures and pavements, the proposed architectural layout.

Costin Roe Consulting have also prepared an Erosion and Sediment Control Plan to be implanted during the construction of the proposed development, as shown in **Appendix L**.

6.12.2 Water Cycle Management

Costin Roe Consulting has devised a stormwater management system for the proposed development and have considered the potential impacts for stormwater quantity and quality management. The proposed stormwater management works are discussed below and are set out in the Civil Plans at **Appendix L**. The proposed water cycle management system will enable the development to satisfy the relevant Liverpool City Council requirements.

Water Quantity

Stormwater will be conveyed via an underground piped drainage system to discharge from the site in the north-western corner of the property boundary, per the strategy considered in SSD 6324. On site detention is also proposed in the form of a 504m³ tank to be constructed in north west of the site, which ensures the post-development flows are improved during the 1 in 5 year, 1 in 20 year and 1 in 100-year ARI storms. Costin Roe Consulting confirm that the proposed water quantity management system meets Council requirements.

Water Quality

Stormwater treatment measures are proposed in accordance with the approved concept under SSD 6324 and Council's requirements. This comprises installing Gross Pollutant Traps to treat water from parking, hardstand, and roof areas, and using the Bedwell Park Wetland 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 detail design phase of the development but remains capable of achieving Council's annual percentage pollutant reductions.

6.12.3 Water Demand and Infrastructure

UMOW LAI prepared an Integrated Water Management Plan submitted with the original proposal. This included an assessment of the likely demand for water and the availability of infrastructure in order to accommodate the proposed development. The report confirmed that the proposed development will employ rainwater harvesting on site to collect runoff from warehouse roof areas and use these areas for non-potable purposes such as irrigation and bathrooms. It is expected that the site can capture up to 20kL of water, which will reduce operational potable water demands by 80%.

The recommendations within this report remain relevant to the revised Steelforce facility, and as such it is recommended that these proposed water harvesting methods be employed to address water management on the site.

6.13 Biodiversity

Approvals were granted for the Concept Approval (SSD 6324) prior to the new Biodiversity Conservation Act 2017 and were in accordance with the relevant acts at the time of approval. Specifically, offsets are proposed in accordance with the TSC Act and have been approved as per the Offset Strategy prepared by Eco Logical in 2015, which outlines a requirement of 35 ecosystem credits. As such, there is no need for further approval under the new Biodiversity Conservation Act 2017. A BDAR Waiver was submitted to the Department of Planning and Environment during as part of the applicant's response to submissions for the previous application. The offset requirements and status of works noted within this BDAR waiver remain consistent with this revised application.

6.14 Heritage

Aboriginal Heritage

In a letter dated 1 April 2016, the Department confirmed the satisfaction of Concept Approval Condition B3, as outlined in **Table 3**. This was met with the Aboriginal Heritage Assessment Report by AHM, dated 20 October 2015.

European Heritage

The site not a heritage item, located in a conservation area, or proximate to any State or local heritage items. The Department of Planning & Environment'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'.

No further assessment of heritage impact is considered necessary.

6.15 Waste Management

The proposed tenant has determined the types, storage locations and quantities of waste generated within the proposed facility. The proposed waste management for waste generation identified in **Table 6** is outlined below.

Table 6 - Waste Generation of proposed facility

Waste Type	Avg Qty/Wk	Handled By:	Landfill/ Recycle
General Waste	250kg	Remondis	Landfill
Wood – Pallets	TBC	Remondis	Recycled
Light Gauge Scrap Steel	250kg	TBC	Recycled
Heavy Gauge Scrap Steel	2500kg	TBC	Recycled

Waste Storage Areas provided are as below:

- 3 x 3m³ front load bin for general waste – located at the rear of the warehouse
- 4 x 2m³ hook and tipper bins for light gauge scrap steel - located at the rear of the warehouse
- 2 x 10m³ hook lift bins for heavy gauge scrap steel - located at the rear of the warehouse

Wastes will be collected by external waste service (Remondis or similar) from Steelforce as follows:

- General waste – collection fortnightly
- light gauge scrap steel waste– collected weekly
- heavy gauge scrap steel waste - collection fortnightly

These measures were considered in the design of the proposed facility, which Steelforce determined to provide adequate storage space. Further Waste Management and Operational detail will be confirmed prior to Construction Certificate.

6.16 Air Quality

An Air Quality Impact Assessment has been prepared by SLR Consulting to determine the baseline air quality conditions and evaluate the potential air quality impacts from the proposed construction and operation of the proposed warehouse (**Appendix M**). The nearest residential receiver appears to be in abandoned conditions, with residential receivers primarily located to the east of the site.

The assessment provides a qualitative assessment of potential dust and emissions as a result of the construction works. It confirms that there is a medium risk of dust and human health impacts occurring off-site, if no mitigation measures are applied to control emissions from earthworks and construction. SLR Consulting therefore recommend that standard construction dust mitigation methods be implemented where practical to avoid dust generation. They anticipate that with the application of the mitigation measures, sensitive receptors in the vicinity of the development will not experience significant, adverse air quality impacts as a result of the proposed works.

Air quality issues associated with the operation of the site predominantly relate to wheel generated dust and products of combustion associated with the trucks and other vehicles entering and leaving the site, or idling at the site during loading/unloading operations. SLR conclude that no significant sources of air emissions have been identified in the warehouse. No significant emissions of dust to the atmosphere are anticipated from the metal cutting operations. Any metal shavings are expected to be collected at the end of each shift.

In view of this, SLR Consultation confirm that the impact of the proposed development on air quality is expected to be low.

6.17 Environmentally Sustainable Development

A BCA Report has been prepared by McKenzie Group, which confirms that the proposed development is capable of complying with the deemed-to-satisfy provisions of the BCA. To achieve compliance, there are two options available. The building can comply with the deemed-to-satisfy provisions of the BCA, or the building can be verified against a reference building as per Verification Method JV3.

Certification from an appropriately qualified engineer will be provided prior to Construction Certificate.

The proposed Steelforce facility will be constructed to a 5 star green star rating.

6.18 BCA

A Compliance Assessment against the Building Code of Australia and relevant Australian Standards has been prepared by McKenzie Group and is submitted with this application at **Appendix N**. The proposal is found to be capable of satisfying the requirements of the BCA, or deemed to satisfy provisions, and relevant standards. All detailed design matters can be confirmed prior to Construction Certificate.

6.19 Construction

An Environmental Management Plan has been prepared by CIP and is included at **Appendix O**. A summary of the assessment and proposed mitigation measures are provided below. The report outlines environmental management practices and procedures to be followed during the construction the works, to ensure no adverse environmental impacts during the construction of the proposed facility. Specifically, the report includes measures and procedures to:

- reduce or eliminate the release of pollutants into the environment during construction;
- promote environmental awareness amongst employees and contractors and best environmental practise; and
- To reduce waste generation and the depletion of resources by utilising the “avoid, reduce, reuse, recycle” principles where practicable and appropriate.

All construction works will occur within the construction hours stipulated by the Concept Approval.

Activities that are considered to have significant environmental impact (Rating 1) are mitigated with specific control measures, contained within Action Plans.

Communication with the adjoining properties and neighbouring workers shall be undertaken on an on-going basis, in advance of activities that may be considered as potentially affecting amenity. This includes potential impacts such as excessively noisy, dusty or traffic generating activities.

In addition, a Traffic Management Plan has been prepared by CIP and is included at **Appendix Q**. The report outlines traffic procedures to mitigate environmental impacts during construction, and includes recommended site entry and exit points, parking arrangements, risk control measures and required controller qualifications.

6.20 Social Impacts

A social impact assessment was completed and submitted to the Department as part of the response to submissions for the previous proposal. Due to the lower risk and non-hazardous nature of this revised proposal, most of the impacts and recommended mitigation measures are no longer required. Notwithstanding, Elton Consulting concluded that given the appropriate technical studies and environmental risk assessments considered, the previously proposed Nulon facility does not present any tangible negative social impacts on the community that without mitigation would be considered significant. This assessment remains relevant to the proposed Steelforce facility.

7.0 Mitigation Measures

The collective measures required to mitigate the impacts associated with the proposed works are detailed in **Table 7** below. These measures have been derived from the previous assessment in **Section 5.0** and those detailed in appended consultants' reports.

Table 7 – Mitigation Measures

Mitigation Measures
<p>Traffic and Parking</p> <ul style="list-style-type: none"> A Green Travel Plan incorporating a Transport Access Guide will be prepared and submitted as part of the Construction Certificate documentation.
<p>Hazard and Risk</p> <ul style="list-style-type: none"> The design includes fire walls to ensure adequate separation of storage locations as required by AS 1940-2017.
<p>Waste Management</p> <ul style="list-style-type: none"> Proposed water harvesting methods be employed to address water management, as recommended within Civil Report accompanying this application.
<p>Noise Impact</p> <ul style="list-style-type: none"> Vehicle engines should be switched off during loading and unloading within the dock. Construction works should be undertaken in accordance with the acoustic and vibration control measures outlined within the Acoustic Logic Report accompanying the application.
<p>Bushfire</p> <ul style="list-style-type: none"> The following ember protection measures are to be included within the design and construction of the buildings: <ul style="list-style-type: none"> 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; Nylon brush seals around roller doors or similar measure to prevent the entry of embers through gaps greater than 3 mm; and Landscaping to be managed to Inner Protection Area standards as per Section 3.2 of the Bushfire Protection Assessment report (Appendix K).
<p>Construction Management</p> <ul style="list-style-type: none"> A detailed Construction Environmental Management Plan has been submitted under Appendix O and all applicable sub-documents will be developed for Construction Certificate and implemented for all construction works. Activities include: <ul style="list-style-type: none"> Conduct vibration and noise measurements/monitoring at potentially worst affected receivers during periods when the impact from construction is greatest, when activities may have the potential to impact surrounding receivers. A reporting system be implemented with information including: <ul style="list-style-type: none"> A register of complaints received/communication with the local community Where noise/vibration complaints require noise/vibration monitoring, results from monitoring. Any noise exceedances occurring including, the actions taken and results of follow up monitoring. A report detailing complaints received and actions taken shall be presented. All monitoring and reporting shall be conducted in conjunction with the conditions of consent. The person(s) responsible for complaint handling and contact details for receiving of complaints shall be established on Site prior to construction works commencing, with contact details displayed at the Site for the public. If a noise complaint is received the complaint should be recorded on a Noise Complaint Form. Communication with the adjoining properties and neighbouring workers shall be undertaken on an on-going basis, in advance of activities that may be considered as potentially affecting amenity
<p>Air Quality</p> <ul style="list-style-type: none"> Standard construction dust mitigation methods be implemented where practical to avoid dust generation.
<p>Operational Management</p> <ul style="list-style-type: none"> A detailed Operational Management Plan, Emergency Procedure and all applicable sub-documents will be developed for Occupation Certificate and adhered to by Steelforce.

8.0 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 detailed design of an approved Concept Plan for a new light industrial warehouse. The biophysical, social and economic impacts have been examined as part of the original Concept Plan approval and as part of this EIS.

8.1 Social and Economic

The environmental impact assessment of the proposed development has demonstrated that the development will have an overall positive social and economic impact. The proposal will facilitate the delivery of an early stage of the Bringelly Road Business Hub as envisioned by the approved Concept Plan. This will provide a significant social and economic benefit to the community by securing funding for the ongoing management and improvement of the recreation and sporting facilities of the Parklands. In addition, the proposal:

- Provides direct employment during the construction phase and permanent employment of 38 jobs during the operational phase; and
- Will not unduly impact on other commercial centres within the region (as determined by SSD 6324).

8.2 Biophysical

The environmental impact assessment of the proposed development demonstrated that:

- The proposal would not have any unjustified effect on threatened species, populations or ecological communities or their habitats arising from the construction or use of the site; and
- The proposal will not result in any undue impacts on air quality, bushfire, noise, waste or stormwater quality.

8.3 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; and
- 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 the proposed measures to prevent environmental degradation are considered to be robust and consistent with the Precautionary Principle.

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, environmental, recreational and sporting facilities and requirements of the Parklands;
- Implementing safeguards and management measures to protect environmental values;
- Facilitating job creation in proximity to existing populations; and
- Ensuring a high quality public domain and amenity within and around the site.

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 potential impacts of the development on the environmental value of the site and surrounds was assessed as part of the Concept Plan. 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.

9.0 Conclusion

The Environmental Impact Statement (EIS) has been prepared to consider the environmental, social and economic impacts of the proposed Steelforce warehouse. The EIS has addressed the issues outlined in the Director-General's Requirements and accords with Schedule 2 of the EP&A Regulation.

Having regard to 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 an early stage of the Bringelly Road Business Hub is consistent with the Concept Plan approval (SSD 6324);
- The proposal is permissible with consent and meets all requirements of the relevant planning controls for the site;
- The development provides direct employment during the construction phase and permanent employment during the operational phase;
- The environmental risks associated with the construction and operation of the facilities can be appropriately mitigated; and
- The development provides adequate parking to service the uses and will not increase on-street parking demand nor cause any adverse traffic impacts.

Overall the application facilitates the delivery of the second stage 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.