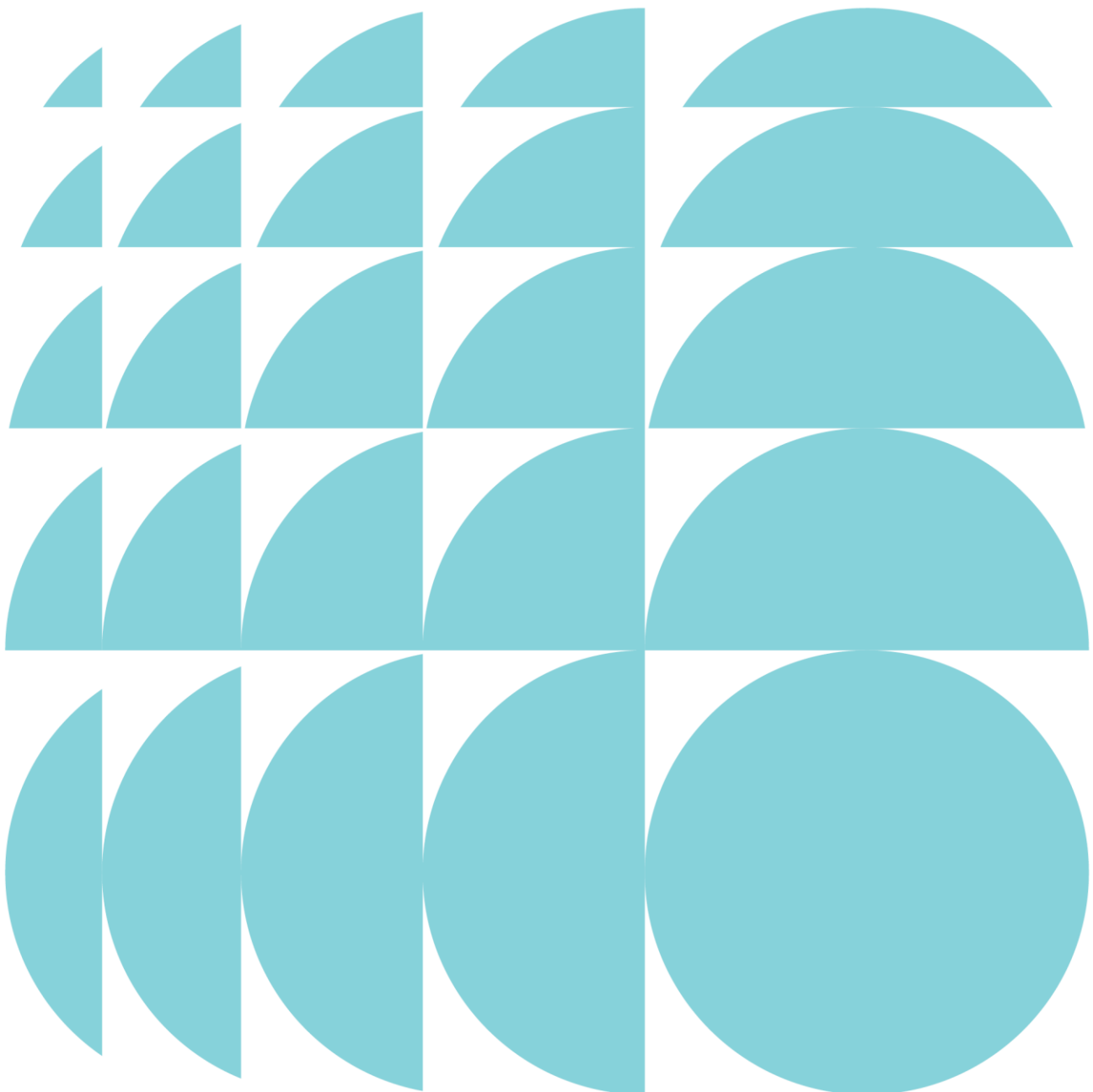


Skyline Crescent, Leppington
Bringelly Road Business Hub – CFC Group
Facility

Submitted to The Department of Planning and
Environment
On behalf of CIP/CH (Bringelly) Pty Ltd

24 September 2018 | 218555



CONTACT

Tim Smith	Senior Urbanist, Planning	tsmith@ethosurban.com	9409 4970
-----------	---------------------------	-----------------------	-----------

Reproduction of this document or any part thereof is not permitted without prior written permission of Ethos Urban Pty Ltd.

This document has been prepared by:



This document has been reviewed by:



Tim Smith	24 September 2018	Jim Murray	24 September 2018
-----------	-------------------	------------	-------------------

Reproduction of this document or any part thereof is not permitted without written permission of Ethos Urban Pty Ltd. Ethos Urban operates under a Quality Management System. This report has been prepared and reviewed in accordance with that system. If the report is not signed, it is a preliminary draft.

VERSION NO.	DATE OF ISSUE	REVISION BY	APPROVED BY
1	24 September 2018	JM	JM

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

Statement of Validity	5
Executive Summary	6
1.0 Introduction	8
1.1 Overview of Proposed Development	8
1.2 Background to the Development	8
1.3 Objectives of the Development	10
1.4 Analysis of Alternatives	10
1.5 Secretary's Requirements	11
2.0 Site Analysis	16
2.1 Site Location and Context	16
2.2 Surrounding Development	17
3.0 Description of the Development	19
3.1 Numerical Overview	19
3.2 Site Preparation	19
3.3 Built Form	20
3.4 Landscaping and Public Domain	20
3.5 Pedestrian and Bicycle Access	21
3.6 Vehicular Access and Parking	21
3.7 Operational Details	21
3.8 Development Staging	22
3.9 Proposed Signage	22
4.0 Consultation	23
5.0 Environmental Assessment	25
5.1 Relevant EPIs, Policies and Guidelines	25
5.2 Consistency with Concept Approval (SSD 6324)	27
5.3 Land Uses	28
5.4 Built Form, Urban Design and Landscaping	29
5.5 Hazards and Risk	29
5.6 Traffic, Parking and Accessibility	30
5.7 Acoustic Impact	31
5.8 Signage	33
5.9 Crime Prevention Through Environmental Design	34
5.10 Visual Impact	35
5.11 Bushfire	35
5.12 Soil and Water	35
5.13 Biodiversity	36
5.14 Heritage	36
5.15 Air Quality	36
5.16 Building Code of Australia	37
5.17 Waste Management	37
5.18 Construction Impact	37
6.0 Mitigation Measures	38
7.0 Justification of the Proposal	40
7.1 Social and Economic	40
7.2 Biophysical	40
7.3 Ecologically Sustainable Development	41
8.0 Conclusion	42

Figures

Figure 1	Concept Approval Site Plan (Site is Lot 6)	9
Figure 2	Western Sydney Parklands	16
Figure 3	Site aerial photograph	17
Figure 4	Site context map	18
Figure 5	Extract from the Landscape Detail Plan	21
Figure 6	The proposed business identification signage on the southern elevation	22
Figure 7	Site and surrounding noise receivers	31

Tables

Table 1	Secretary's Requirements	11
Table 2	Key development information	19
Table 3	Liverpool City Council – key considerations	23
Table 4	Summary of consistency with relevant Strategies, EPIs, Policies and Guidelines	25
Table 5	SSD 6324 – Conditions to be met in future development applications	27
Table 6	Comparison of quantities of DGs stored against SEPP 33 threshold	30
Table 7	Predicted noise levels from the proposed development	32
Table 8	Summary of Predicted Sleep Disturbance Levels (dBA)	32
Table 9	Assessment of the proposal against the assessment criteria contained at Schedule 1 of SEPP 64	33
Table 10	Mitigation Measures	38

Appendices

A Secretary's Environmental Assessment Requirements
Department of Planning and Environment

B Architectural Drawings
CIP Group

C Survey Plan
Land Partners

D Landscape Plan
Habit8

E Engagement Report
Elton Consulting

F Design Guidelines Summary Table
Ethos Urban

G Traffic Assessment
Transport and Traffic Planning Associates

- H** Civil Engineering Drawings
Costin Roe
- I** Acoustic Assessment
SLR Consulting
- J** Air Quality Assessment
SLR Consulting
- K** BCA Assessment
McKenzie Group
- L** Crime Prevention Through Environmental Design Report
Ethos Urban
- M** Bushfire Assessment
Eco Logical
- N** BDAR Assessment Waiver
- O** Dangerous Goods Assessment
Riskcon Engineering
- P** Environmental Management Plan
CIP
- Q** Traffic Management Plan
CIP
- R** Civil Engineering Report
Costin Roe
- S** Visual Impact Assessment
CFC Group
- T** Staging Plan
CFC Group
- U** Waste Generation Estimates
CFC Group
- V** Correspondence with relevant agencies and bodies

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 6 within Bringelly Road Business Hub located at Bringelly Road, Horningsea Park (Lot 11 in DP29104)
Proposed development	Construction and operation of a large format retail building with associated warehouse and workshop spaces, ancillary office, car parking and landscaping within the Bringelly Road Business Hub. The building will be for the display and sale of machinery and construction equipment.

Prepared by

Name	Jim 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 Jim Murray

Date 24/09/2018

Executive Summary

Purpose of this Report

This submission to the Department of Planning and Environment (DPE) comprises an 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 development of a facility for CFC Group 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 DPE 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 30 July 2018. Accordingly, the SEARs were issued on 31 August 2018. This submission is in accordance with the DPE'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 facility for CFC Group at future Lot 6 of the Bringelly Road Business Hub. It includes detailed development and construction of:

- large format retail showrooms, associated warehousing and distribution facilities;
- workshop for maintenance and assembly; and
- ancillary office administration.

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 CFC Facility, and is located on Proposed Lot 6.

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 CIP/CH (Bringelly) Pty Ltd (CIP/CH) and CFC Group 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 preliminary Environmental Management Plan located at **Appendix P**. Mitigation measures have been detailed at **Section 6.0**.

Conclusion and Justification

The EIS addresses the SEARs, and the proposal provides for a facility that will cater to a range of uses associated with the CFC Group. 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.

1.0 Introduction

This Environmental Impact Statement (EIS) is submitted to the Department of Planning and Environment (DPE), 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 DPE 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 CIP/CH (Bringelly) Pty Ltd (CIP/CH or the applicant), and is based on the Architectural Drawings provided by CIP (**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:

- the detailed development and construction of a CFC Group facility at future Lot 6 of the Bringelly Road Business Hub, comprising the provision of:
 - a warehouse and workshop facility (light industrial);
 - a showroom (large format retail); and
 - ancillary office space;
- internal civil infrastructure works to enable the provision of the development, including the construction of internal roadways and earthworks;
- provision of 88 parking spaces, comprising a mix of warehouse, office, showroom and workshop parking;
- provision of loading areas, including the proposed warehouse drive-through which will be used for the purposes of loading and unloading goods; and
- provision of business identification signage.

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**.



Figure 1 Concept Approval Site Plan (Site is Lot 6)

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.

1.2.1 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.

1.2.2 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:

- 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).

The proposed development has accordingly been designed to be consistent with the approved subdivision layout under MOD 2.

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 the CFC Group, which is involved with equipment distribution, transport / logistics and specialised mining, utility and infrastructure services. This facility will enable the CFC Group to bring together a number of its current business units, enabling for the colocation of services within the one key site. This carries strategic merit, by consolidating existing services such that a number of compatible uses can operate in the same site.

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 CFC Facility 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 CFC Facility use provides for a range of compatible uses within the context of one single site, where efficiencies can be gained from the colocation of multiple appropriate uses. The business uses also respond to the needs of the Western Sydney community while limiting any impact on surrounding 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 (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 DPE issued the requirements for the preparation of the EIS on 31 August 2018. A copy of the SEARs is included at **Appendix A**.

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	
<i>The Environmental Impact Statement (EIS) must address the Environmental Planning and Assessment Act 1979 and meet the minimum form and content requirements in clauses 6 and 7 of Schedule 2 the Environmental Planning and Assessment Regulation 2000.</i>	Environmental Impact Statement
<i>The EIS Must include:</i>	Section 5.0
<i>a detailed description of the development, including:</i> <i>a description of the proposed operation</i> <i>the need and justification for the proposed development</i> <i>likely staging of the development</i> <i>likely interactions between the development and any existing, approved and proposed developments in the vicinity of the site</i> <i>plans of any proposed works with details of the proposed setbacks, site coverage, car parking, landscaped areas</i> <i>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.</i> <i>a detailed description of how the development is consistent with the Bringelly Road Business Hub concept approval (SSD 6324), particularly with the approved land uses.</i> <i>consideration of all relevant environmental planning instruments, including identification and justification of any inconsistencies with these instruments.</i> <i>a list of any approvals that must be obtained under the Local Government Act 1993 or the Roads Act 1993, or any other Act or law before the development may lawfully be carried out.</i>	- Section 5.7 - Section 7.0 - Section 3.9 - Section 5.10 - Section 3.1 / Appendix B - Section 3.8 - Section 5.2 / Appendix F - Section 5.1 - Section 5.1

Requirement	Location in Environmental Assessment	
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 / Appendix P	
- a detailed assessment, where relevant, of the key issues below, and any other potential significant issues identified in the risk assessment, which must include: - a description of the existing environment, including sufficient baseline data	Section 2.0 / Throughout Assessment	
an assessment of the potential impacts of the development, including any cumulative impacts due to other development in the vicinity	Section 5.0	
measures 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	Section 6.0	
a consolidated summary of all the proposed environmental management and monitoring measures, highlighting commitments included in the EIS	Section 6.0 / Appendix P	
- the EIS must also be accompanied by a report from a qualified quantity surveyor providing: - 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 - a close estimate of the jobs that will be created by the development during the construction and operational phases - certification that the information provided is accurate at the date of preparation	Submitted under separate cover	
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:		
Community and Stakeholder Engagement – including: - 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 - details of proposed engagement activities throughout the construction and operation of the development	Section 4.0	Appendix E
Social and Economic – including: - identifying and analysing the potential social impacts of the development from the point of view of the affected community and other relevant stakeholders - assessment of the significance of positive, negative and cumulative social impacts - mitigation measures and monitoring of likely negative social impacts - an analysis of any potential economic impacts of the development, including a discussion of any potential economic benefits	Section 7.1	
Strategic Context – including: - detailed justification for the proposal having regard to its location and impacts, the suitability of the site and public interest - demonstration that 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: - State Environmental Planning Policy (Western Sydney Parklands) 2009 - the Parklands Plan of Management 2020 - the Parklands Plan of Management 2020 Supplement	Section 5.1	

Requirement	Location in Environmental Assessment	
– the Parklands draft Plan of Management 2030 – justification of the proposed site layout		
• Traffic and Access – including: – a quantitative Traffic Impact Assessment prepared in accordance with the relevant Council, Austroads and RMS guidelines – details of all daily and peak traffic and transport movements likely to be generated by the development (vehicle type, public transport) during construction and indicative operation – details and a justification of access to, from and within the site (vehicular and pedestrian) – impacts on the safety and capacity of the surrounding road networks (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 – demonstrate that sufficient loading / unloading, car parking and pedestrian and cyclist facilities have been provided for the development – details of road upgrades, new roads or access points required for the development, if necessary	Section 5.6	Appendix G
• Noise and Vibration – including: – a quantitative noise and vibration impact assessment undertaken by a suitably qualified person in accordance with the relevant Environment Protection Authority (EPA) guidelines and including an assessment of nearby sensitive receivers – cumulative impacts of other development – details of proposed mitigation, management and monitoring measures	Section 5.7	Appendix I
• Urban Design – including: – measures to minimise the potential visual impacts of the development including: – a detailed assessment (including photomontages and perspectives) 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 – 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 A8 of the development consent for SSD 6324	Section 5.10	
• Bushfire – including: – a bushfire assessment report which provides an assessment of bushfire hazard, including: – details of the storage of flammable materials – an assessment against the requirements of Planning for Bushfire Protection 2006, 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 5.11	Appendix M
• Soil and Water – including: – a description of water demands of the development and a breakdown of water supplies – identify any water licensing requirements under the Water Act 1912 or Water Management Act 2000 – details of proposed erosion and sediment controls during construction – detailed plans and a description of the surface and stormwater management system, including on-site detention, designed in accordance with Water Sensitive Urban Design principles – an assessment of potential flooding impacts – an assessment of potential impacts (including from potential spillage of materials) on surface and groundwater resources, drainage patterns, soil (stability, salinity and acid sulfate soils), related infrastructure, watercourses and riparian land and proposed mitigation measures	Section 5.12	Appendix H Appendix R

Requirement	Location in Environmental Assessment	
• Hazards and Risk – including: – 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 5.5	Appendix O
• Biodiversity – including: – details of the number of trees to be removed and the number of trees to be planted on the site – an assessment and documentation of biodiversity impacts related to the development in accordance with the Biodiversity Assessment Method and documented in accordance with the Biodiversity Development Assessment Report (BDAR) in the form required by section 6.12 of the Biodiversity Conservation Act 2016, clause 6.8 of the Biodiversity Conservation Regulation 2017 and the Biodiversity Assessment Method	Section 5.13	Appendix N
• Heritage – including: – an assessment of European Heritage including potential impacts on the surrounding site and surrounding area, including any built landscape items, conservation areas, views and settings	Section 5.14	
• Waste Management – including: – details of the quantities and classification of all waste streams to be generated on site in accordance with the EPA's Waste Classification 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 2014-2021	Section 5.17	Appendix P
• Air Quality – including: – a description of all air quality impacts (including dust) from the proposal, particularly from the outdoor storage area – details of dust control during site preparation and civil works	Section 5.15	Appendix J
Plans and Documents		
The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the Environmental Planning and Assessment Regulation 2000. Those documents should be included as part of the EIS rather than as separate documents.	Throughout application	
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: • Western Sydney Parklands Trust • Liverpool City Council • Roads and Maritime Services • Transport for New South Wales • Office of Environment and Heritage • Environment Protection Authority	Section 4.0	Appendix E

Requirement	Location in Environmental Assessment
• Sydney Water • Water NSW • Rural Fire Service • Jemena • surrounding landowners and the local community • any other public transport or community service providers <i>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.</i>	

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 both 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.

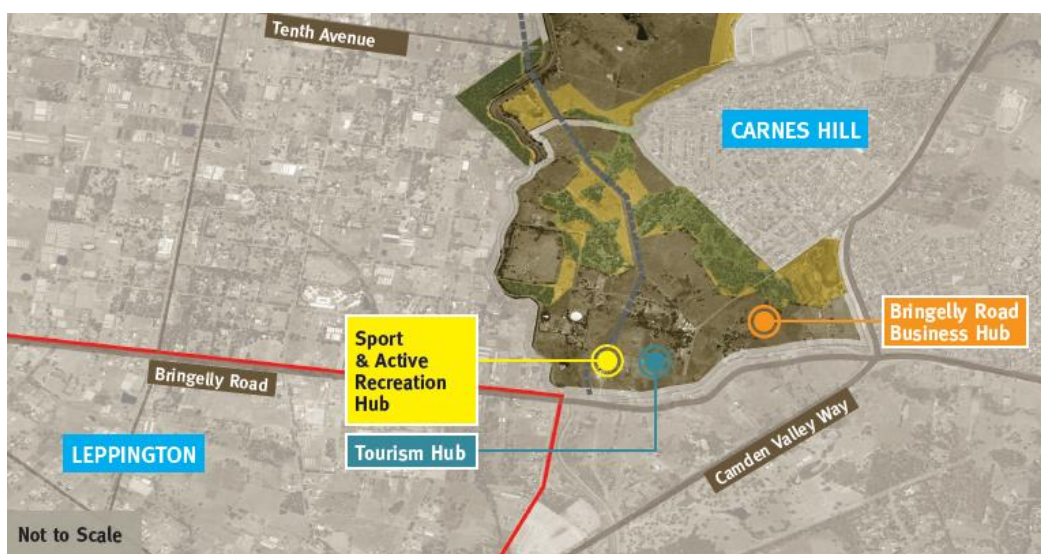


Figure 2 Western Sydney Parklands

Source: Plan of Management 2020 – Supplement – March 2014

The CFC Group Facility is proposed on Lot 6, which is located within the wider Business Hub (see **Figure 2**). The site is bounded by Bedwell Park to the north, Lot 8 to the east (currently subject to a separate DA), Skyline Crescent to the south and vacant land for future additional stages of the Bringelly Road Business Hub to the west (demonstrated at **Appendix T**).

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 6 of the approved Bringelly Road Business Hub. It is a centrally located lot in the wider business hub and has an area of approximately 22,005 m² (refer to **Appendix B**).

The site is generally cleared of vegetation and is currently undeveloped (see **Figure 2**).

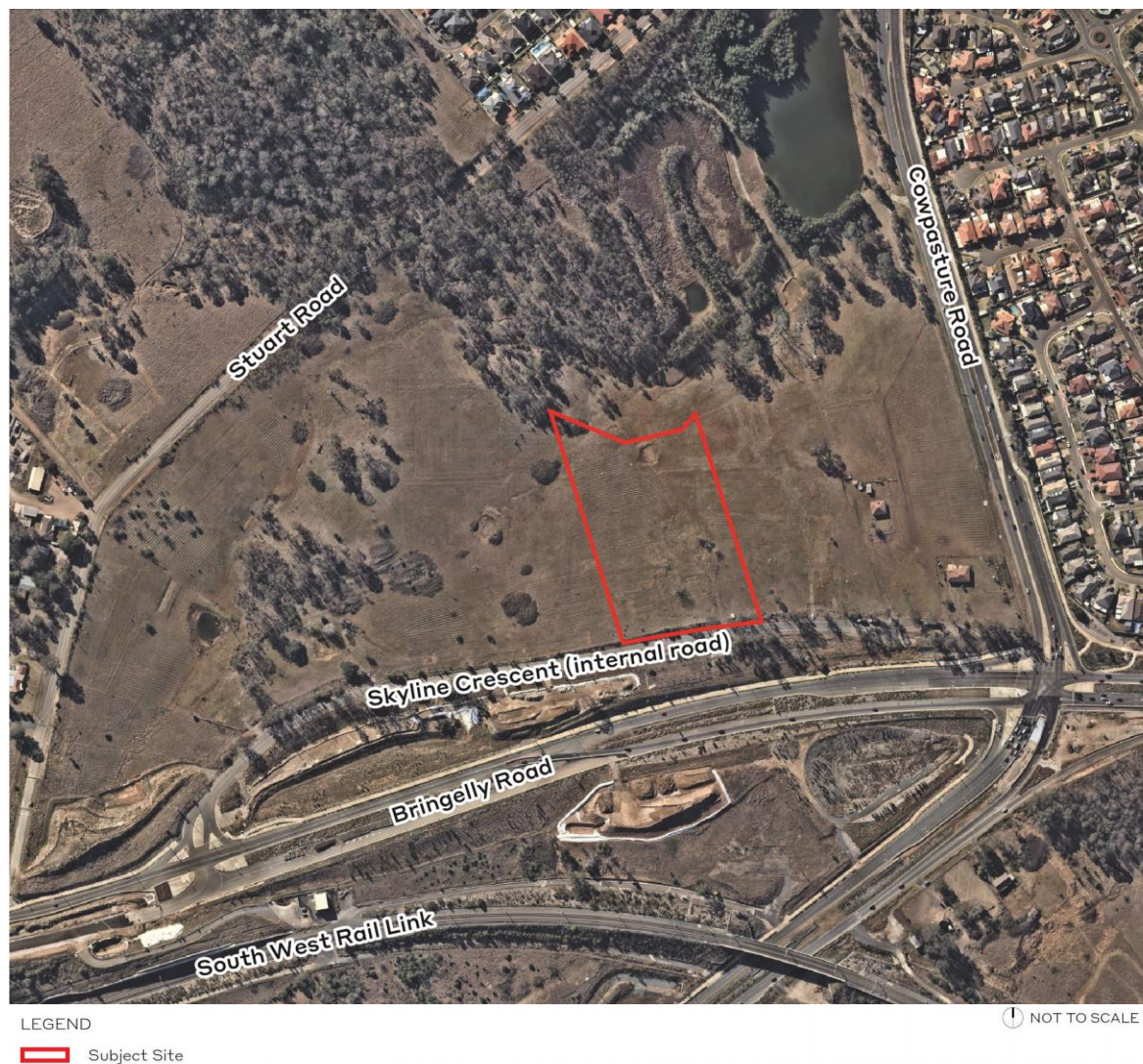


Figure 3 Site aerial photograph

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**.

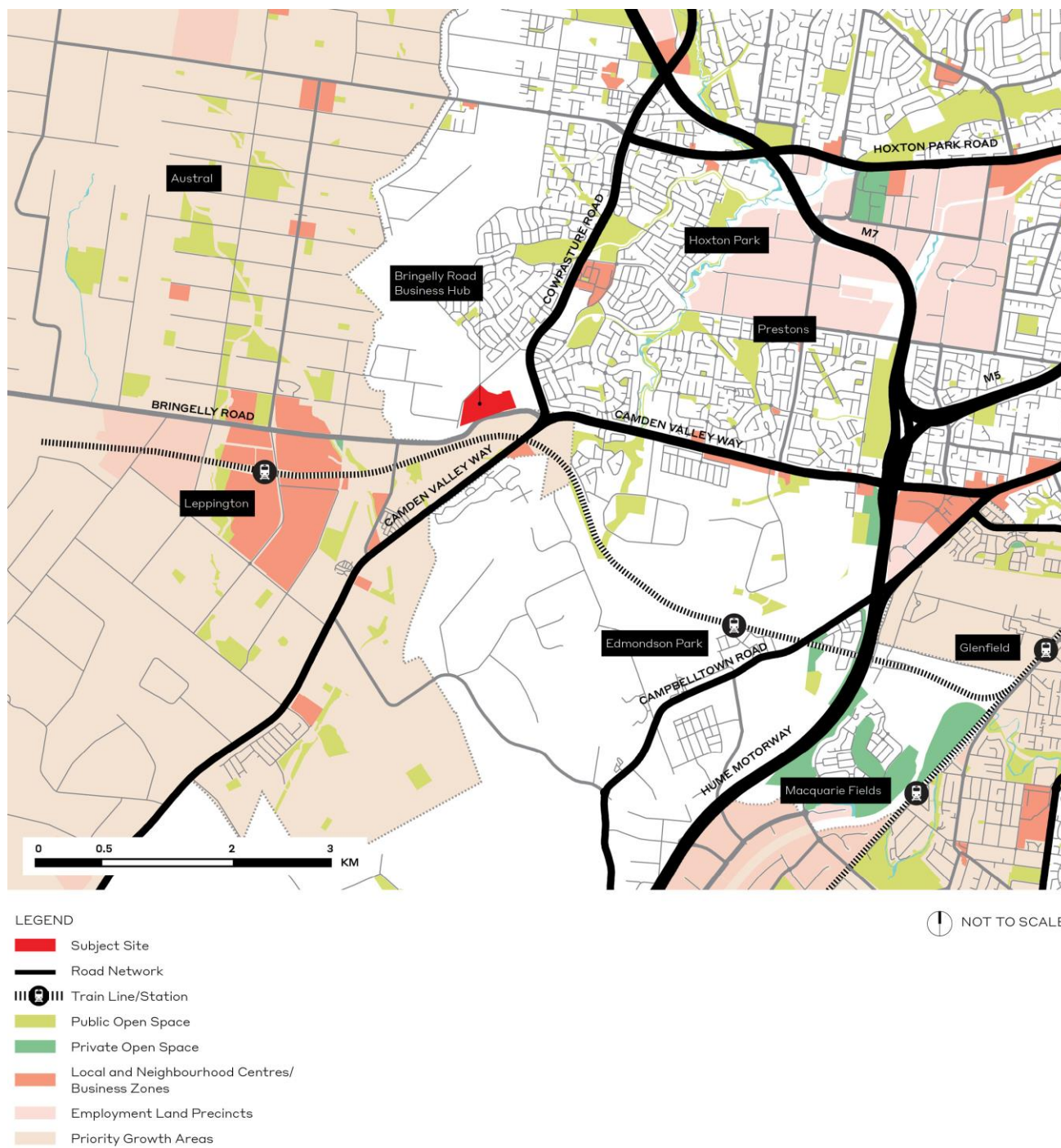


Figure 4 Site context map

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:

- the detailed development and construction of a CFC Group facility at future Lot 6 of the Bringelly Road Business Hub, comprising the provision of:
 - a warehouse and workshop facility (light industrial);
 - a showroom (large format retail); and
 - ancillary office space; and
- internal civil infrastructure works to enable the provision of the development, including the construction of internal roadways and earthworks;
- provision of 88 parking spaces, comprising a mix of warehouse, office, showroom and workshop parking;
- provision of loading areas, including the proposed warehouse drive through which will be used for the purposes of loading and unloading goods; and
- provision of business identification signage.

3.1 Numerical Overview

The key numeric development information is summarised in **Table 2**.

Table 2 Key development information

Component	Proposal
Site area	22,052sqm
GFA	6,515sqm, comprising: • Warehouse: 2,456sqm • Workshop: 1,844sqm • Showroom: 1,575sqm • Main Office (Level 1): 640sqm But excluding the Warehouse Drive-Through
Maximum Height	13.7m
Boundary Setbacks • North • South • East • West.	40m to washbay, 50m to workshop 7m 17m 6m
Car spaces	88 spaces
Site coverage (including internal warehouse drive through)	32.3%
Site coverage (excluding internal warehouse drive through)	27.4%
Operating Hours	24 hours, 7 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 consolidated warehouse and showroom building with a maximum height of 13.7m. Specifically, the proposal has been designed around a central drive-through area for trucks, which provides a covered area which benefits from access to the warehouse and workshop components of the development. The warehouse / workshop component of the development is one storey only.

The showrooms are located towards Skyline Crescent and provide an activated frontage to Skyline Crescent. The ancillary office space is located on level one above the showrooms.

Land Uses

The proposed development comprises the following uses:

- The provision of large format retail showrooms (1,575m²), and associated warehousing and distribution facilities (2,456m²). Ancillary secondary office space has also been provided as part of this facility.
- The provision of a workshop area (1,844m²), for the purposes of maintenance and assembly.
- The provision of an ancillary main office area at Level 1 of the development (640m²), to be used as part of the wider CFC operations.

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 and showroom 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 **Appendix D**). 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;
- 1m screen shrubs along the fence line at the street boundary;
- Partial hedge planting (between 1-2m high) along the site's western boundary; and
- some minor additional planting at the rear of the showroom building near the staff recreation area.

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 and customers will use cars and trucks to access the site. However, the development includes the provision of bicycle parking, lockers and shower facilities at the site.

More broadly, 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 three driveways from Skyline Crescent, these are:

- a 6m wide combined ingress / driveway centred on the western carpark for the use of car ingress and egress;
- a 12m wide combined ingress / egress driveway located towards the centre of the site for truck ingress and car park access; and
- an 8m wide egress driveway located at the eastern boundary for truck egress.

88 car parking spaces are proposed for the use of employees and visitors, including the provision of 2 accessible spaces.

The CFC Facility has been designed in accordance with the relevant Australian Standards which include AS2890.1, AS2890.2 and AS2890.6.

3.7 Operational Details

The proposed development seeks approval for a development which incorporates a number of uses at the site. Specifically, these uses include a warehouse, workshop, showroom and ancillary office, with the following key functions envisaged at the site by CFC:

- Corporate headquarters for the NSW arm of the CFC business.
- Showroom for key CFC brands (three separate but adjacent facilities).
- Maintenance workshop for heavy duty fleet and equipment.

- Warehouse for the storage and management of parks and inventory.
- Supporting functions including an area for a spray booth and wash bay.
- External storage for plant and equipment.

The proposed operational hours would be for 24 hours a day, 7 days a week. However, it is noted that the peak hours of operation would be:

- Monday to Friday: 7.00am to 6.00pm
- Saturday: 6.00am to 4.00pm
- Sunday: 7.00am to 12.00pm

The proposed development will accordingly generate a variety of different jobs associated with each of the components of the development, including jobs in the showroom, workshop, warehouse and office components. On this basis, the development will work as the NSW headquarters for CFC operations, bringing a number of different operations into one central site.

3.8 Development Staging

The proposed development is likely to be the second stage of the development of the Bringelly Road Business Park, following the development of Lot 8 to the east (currently under assessment with the DPE). The context of the development within the wider staging of the Bringelly Road Business Hub is provided at **Appendix T**.

3.9 Proposed Signage

Business identification signage is proposed on the southern elevation and is illustrated at **Figure 6** below. It includes:

- 1 x 'CFC Group' wall sign on the warehouse. The proposed dimensions are approximately 4m width x 4m height (demonstrated as 'CFC Group' at **Appendix B**);
- 3 x signs on showroom comprising: one sign identifying each of the JCB, Redstar Equipment and CEA Group showrooms, with the following dimensions:
 - JCB sign dimensions: Approximately 3.3m x 1.1m;
 - Redstar sign dimensions: Approximately 4.5m x 1.5m; and
 - CEA sign dimensions: Approximately 3.3m x 1.5m.

These signs are demonstrated as 'JCB', 'Redstar Equipment' and 'CEA Group' at **Appendix B** respectively.

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**.

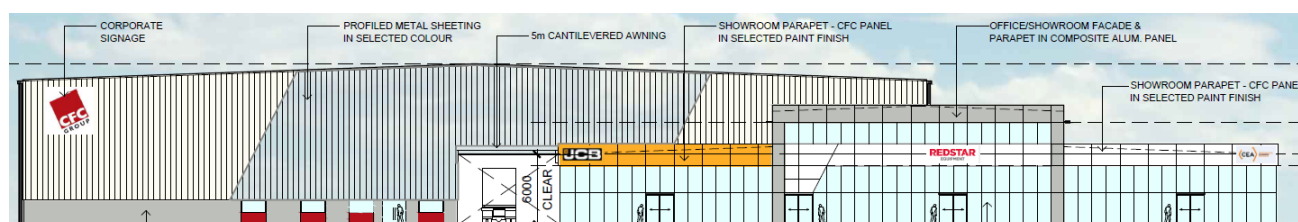


Figure 6 The proposed business identification signage on the southern elevation

SOURCE: CIP

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 N**);
- Environment Protection Authority;
- Sydney Water;
- Jemena;
- Water NSW; and
- Rural Fire Service;

Evidence of the above correspondence has been provided at **Appendix V**. A pre-SSDA meeting was held between CIP/CH and the DPE on 24 July 2018. Additionally, CIP / CH also attended a meeting with Liverpool City Council on 20 August 2018. Council's key issues and responses have been addressed at **Table 3** below.

Table 3 Liverpool City Council – key considerations

Issue	Response	Relevant Section / Appendix
<i>Acoustic attenuation for any identified sensitive receivers' dwellings may be required to mitigate any noise disturbance coming from the repair workshop.</i>	A detailed noise assessment has been undertaken by SLR, including assessment from a number of key receivers. This assessment has confirmed that the proposed development would not result in any adverse acoustic impacts to surrounding residential properties. In addition, a number of mitigation measures have been proposed, which are detailed at Section 6.0 .	Section 5.7 / Appendix I
<i>Potential for the spread of dust from the repair workshop to pose a nuisance to any identified sensitive receivers.</i>	The operations will be undertaken and managed to control dust within the site. This is addressed in the Air Quality Assessment, prepared by SLR, and mitigation measures are proposed at Section 6.0.	Appendix J
<i>The question of appropriate land use and whether the proposed operations fall within the definition of 'light industrial'.</i>	A detailed analysis of the proposed uses and their consistency of the proposed development with SSD 6324 is provided at Section 5.3 . The analysis demonstrates that the proposed development is consistent with the uses approved under concept approval.	Section 5.3
<i>The development would be considered new business for the Liverpool LGA, with the introduction of up to 80 new jobs for the area.</i>	The proposed development will contribute to a number of economic benefits for the surrounding area, which have been further discussed at Section 8.1 .	Section 8.1

Public Consultation

A Consultation Report has been prepared and is included as **Appendix E**. 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).

- The placement of quarter page advertisements in the Wednesday 15 August 2018 editions of the Liverpool Leader and the Liverpool City Champion.
- A letterbox drop to all properties within a 1km radius of the eastern border of the site (the closest edge to residential dwellings). As a result, approximately 1,900 dwellings and businesses received a short newsletter containing information on the project.
- The establishment of an interactive project website, an 1800 hotline and monitored email address.

In response to this consultation, CIP received and recorded three phone calls and two emails following the circulation of the newspaper advertisements and newsletter. Three community members contacted CIP via the 1800 hotline and email address after having received the newsletter and two after having seen the advertisements.

The five enquiries related to different matters, which have been further discussed below:

- *one person called to ask when construction works would commence*
- *one person called to enquire about why an additional light industry facility is being prioritised over the development of cafés, restaurants and retail*
- *one person emailed to investigate opportunities to be involved with racking layouts and storage systems for CFC Group*
- *another person emailed to investigate opportunities to be involved as a design engineer for CFC Group*
- *a final person called to enquire about leasing opportunities at the site.*

Additionally, the newsletter was discussed in the Facebook group 'Stop Proposed Motor Oil and Aerosol Factory 2171', with key points relating to receipt of the newsletter, the definition of various uses at the site, site access, and the role of Western Sydney Parklands Trust in the proposal approval process. A full schedule of the issues raised as well as the responses provided are contained at **Appendix E**.

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 4**.

Table 4 Summary of consistency with relevant Strategies, EPIs, Policies and Guidelines

Instrument/Strategy	Comments
Strategic Plans	
Greater Sydney Region Plan 2018	The proposed development is consistent with the following key objectives in the <i>Greater Sydney Region Plan 2018</i>: • Objective 2 – The proposed development is consistent with this objective, given that the development has been provided in conjunction with a range of wider infrastructure upgrades to support the Bringelly Road Business Hub (detailed under SSD 6324). • Objective 5 – The Bringelly Road Business Hub is the result of collaboration between WSPT, the DPE, Liverpool Council and other entities. This DA represents a direct outcome of that agreement. • Objective 14 – The proposed land uses will generate additional employment opportunities in Western Sydney in an appropriate location. • Objective 16 – The proposal is located close to the M5 and M7 and will directly contribute to the provision of an efficient freight and logistics network. • Objective 20 – The proposal will generate jobs and supply equipment to the building and construction industry. It will contribute directly and indirectly to the economic growth of the Western City. • Objective 23 – The proposal comprises the provision of industrial land in an appropriate and planned location.
Western City District Plan	The proposed development is consistent with the following key planning priorities in the <i>Western City District Plan 2018</i>: • Planning Priority W1 / W2 – The proposed development will contribute to the success of the Bringelly Road Business Hub, a coordinated and planned precinct for the delivery of industrial development in an appropriate location. • Planning Priority W7 – The proposed development represents the integrated delivery of land use and infrastructure planning, and will contribute to the provision of key industrial services in the Western City.
Future Transport Strategy 2018	The <i>Future Transport Strategy 2056</i> details the future direction of Transport for NSW, and seeks to align strategic transportation policy with planning policy in the period to 2056. The proposed development provides industrial and retail development in a location which benefits from excellent access to the Sydney freight network, including the M5 and M7 Motorways.
Sydney's Walking Future	The proposal is consistent with <i>Sydney's Walking Future</i> by providing new footpaths which increases connectivity with surrounding development and the Parklands.
Sydney's Cycling Future	The proposal is consistent with <i>Sydney's Cycling Future</i> by providing end of trip facilities (including bicycle parking and change rooms) and safe paths of travel in and around the site. These facilities will encourage staff to cycle to work.
Sydney's Bus Future	Future bus stops will be provided in bays located on both sides of Bringelly Road close to the intersection with Skyline Crescent. Future bus services will connect 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.
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 6 in accordance with this strategy.
Western Sydney Parklands Draft Plan of Management 2030	The Western Sydney Parklands Draft Plan of Management 2030 was exhibited between 9 March and 9 April 2018, and will serve to provide a framework for the future operation and development of Western Sydney Parklands through to 2030. The proposal is a direct realisation of Objective 3 of the Draft Plan of Management, which seeks to <i>“develop new WSPT Business Hubs and associated opportunities to support the management and further development of the Parklands, and increase employment opportunities”</i> .
State Legislation	
EP&A Act	The proposed development is consistent with the objects of the EP&A Act for the following reasons: • 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. The proposed development is consistent with Division 4.1 of the EP&A Act, particularly for the following reasons: • 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	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 7.0)
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 January 2011. The development supports the objectives of this Plan of Management.
SEPP (State and Regional Development) 2011	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, which the proposal qualifies as.
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 6 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	Refer to Section 5.5 . A Dangerous Goods Assessment (see Appendix O) has determined that the proposed development does not meet the relevant threshold, and therefore the development is not potentially hazardous or offensive.
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 frontage to a classified road and therefore clause 101 of the SEPP applies. The application will therefore 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 5.1 .

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 F .

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 5** addresses conditions of SSD 6324.

Table 5 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 and large format retail development. The proposed uses are 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 CFC 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.
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 GFAs 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 F . Architectural drawings including all the required details of the design have been prepared by CIP Group and are provided at Appendix B .
B4-B5. Landscaping	Landscape Plans have been prepared by Habit8 and included at Appendix D . An assessment of the proposal against the relevant landscape, public domain principles and development guidelines is provided at Appendix F .
B6. Visual Impact	Refer to Section 5.10 .

Condition	Response
B7-B10. Traffic, Access and Parking	Refer to Section 5.6 . A Traffic and Parking Impact Statement addressing these matters has been prepared by Transport and Traffic Planning Associates and included at Appendix G .
B11. Noise and Vibration	Refer to Section 5.7 . A statement addressing these matters is submitted at Appendix I .
B12. Construction	Refer to Section 5.17 . An Environmental Management Plan is submitted at Appendix P .
B13. Developer Contributions	The DPE 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 and integrated water management strategy 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 L .
B17. Bushfire	Refer to Section 5.11 . An addendum to the Bushfire Protection Assessment: Bringelly Road Business Hub, dated November 2014, has been prepared by Eco Logical and is included at Appendix M .
B18. Disability Access	Refer to Section 5.16 . A BCA Report that addresses universal access has been prepared by McKenzie Group and included at Appendix K .
B19. Building Code of Australia	Refer to Section 5.16 . A BCA Report has been prepared by McKenzie Group and included at Appendix K .
B20. Waste	Refer to Appendix P .
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 5.1 .
B23. Staging Plan	The construction of buildings shall be in accordance with the ongoing staging approved at the Bringelly Road Business Hub, with a Staging Plan provided at Appendix T .
B24. Safety Management Study	N/A – The pipeline does not run through the development lot. A Consultation Report has been prepared by Elton Consulting and is included at Appendix E , which includes consultation with Jemena to confirm requirements.
B22. Hazards and Risks	Refer to Section 5.5 . A Dangerous Goods Assessment has been prepared by RiskCon Engineering and is included at Appendix O .
B23. Underground Petroleum Storage System	N/A
B24. Food Outlet	N/A
B26. Utility Services	N/A

5.3 Land Uses

The proposal seeks approval for a mix of the uses approved under the Concept Approval. The relevant land uses are 'large format retail premises' and 'light industry'. The showroom forms the large format retail component; and the warehousing, distribution and workshop form the light industrial component. The office space is ancillary to both uses.

It is noted that the Concept Approval references an indicative building footprint plan which identifies potential locations for specific approved uses. It is also noted that the plan is indicative, and the total indicative gross floor area on the plan equates to 72,449m² (not the approved maximum of 120,000m²). Further, the Concept Approval does not approve this plan.

The indicative master plan approved by the Concept Approval does not specify land use locations. Therefore, there are no conditions in the Concept Approval that require large format retail and light industrial uses to be separated or located in specific areas on site.

The conditions of the Concept Approval reflect the intent of the Concept Plan outlined in the Environmental Impact Statement which states, that the purpose of the proposed development is to:

*“facilitate the potential future use of the Site for large format retail (up to 50,000m² Gross Floor Area (GFA)), light industrial and service centre uses with **flexibility to develop the estate with any combination of these uses as envisaged under the WSP Plan of Management.**”*

The intention to maintain flexibility is reinforced by Conditions A13 and A14 of the Concept Approval which outline maximum gross floor areas for each of the approved uses (which total 158,100m²) and a maximum overall gross floor area (120,000m²). This clearly demonstrates that the intent of the Concept Approval is to not unnecessarily restrict the type and composition of the light industrial and large format retail development that may want to locate at the site.

For these reasons, the proposed land uses are consistent with the Concept Approval.

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 that is consistent with the Design Guidelines. The building mass and location is generally consistent with the indicative building envelopes and prescribed setbacks in the Design Guidelines.

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 F**. The assessment demonstrates that proposal is generally consistent with the guidelines.

5.5 Hazards and Risk

A Dangerous Goods Assessment pursuant to SEPP 33 has been prepared by RiskCon Engineering, which has been undertaken in order to ensure that the proposed development will not result in any adverse impacts in regards to the transport of hazardous waste. This assessment has been provided at **Appendix O**, and has been undertaken in accordance with the following methodology:

- Review of the types and proposed quantities of Dangerous Goods (DGs) to be stored at the site.
- Compare the quantities of DGs against the threshold quantities listed in “Applying SEPP 33 – Hazardous and Offensive Development” to identify whether the storage location or quantity triggers SEPP 33.
- Review the likely vehicular movements involving DGs and compare against the applicable thresholds detailed in Applying SEPP 33.
- Report the findings of the SEPP 33 Assessment.

Proposed Storage Details

The proposed facility will include the storage of the following materials:

- Oils and Greases (Class C1 and C2): 18,550kg

- Dynapac Oils (Class C1): 4,000kg
- Aerosols (Class 2.1): 125kg
- Battery Acid (Class 8): 100kg

The Australian Dangerous Goods Code provides a list of materials which are classified as DGs under the requirements of the code. The goods to be stored are classified as DGs by the code. Therefore, the materials classified as DGs are subject to the assessment requirements of SEPP 33.

It is noted that the abovementioned products classified as C1 and C2 (i.e. the oils and greases, as well as the Dynapac Oils) are not subject to SEPP 33. In line with this, the threshold limits for the application of SEPP 33 are detailed below, alongside the maximum DG quantities that would be stored.

Table 6 Comparison of quantities of DGs stored against SEPP 33 threshold

Class	Description	Quantity	SEPP 33 Threshold	Does SEPP 33 Apply?
2.1	Aerosols	125kg	10,000kg	No
8	Corrosive Substances	100kg	25,000kg	No

This table demonstrates that the relevant criteria would not be exceeded. On this basis, the proposed use is considered appropriate, and in accordance with SEPP 33, a Preliminary Hazard Analysis is not required to be provided. The proposed development will therefore not result in any adverse impacts regarding the storage of DGs on the site.

5.6 Traffic, Parking and Accessibility

A Traffic and Parking Assessment has been prepared by Transport and Traffic Planning Associates (**Appendix G**). A summary of the assessment and proposed mitigation measures are provided below. This assessment has been prepared with reference to the assessment undertaken to inform the approved Concept Plan.

This report includes the following:

- a description of the site, including the surrounding road network and prevailing traffic conditions;
- an assessment of the adequacy of the proposed parking provision;
- an assessment of the potential traffic implications of the proposed development;
- an assessment of the suitability of the proposed vehicle access, internal circulation and servicing arrangements; and
- responses to the relevant SSD Consent Conditions and SEARs.

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 and will not result in any adverse impacts on the surrounding road network, including Bringelly Road. The assessment also notes that the traffic generation will potentially be less.

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

5.7 Acoustic Impact

A Noise Impact Assessment has been prepared by SLR (**Appendix I**). 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 noise impacts on the surrounding receivers based on the predicted noise emissions from the proposed development. The potential noise sources include:

- vehicle noise;
- workshop operations, with opening roller shutter doors on east and west facades of the building;
- external mechanical plant;
- internal warehouse operations; and

The nearest sensitive receivers and noise logger locations are illustrated at **Figure 7**. These represent the closest sensitive receivers to the north, east and west of the site. **Table 7** provides a breakdown of the predicted noise levels at the nearest receivers, and compliance of those levels against the project trigger level.



Figure 7 Site and surrounding noise receivers

Source: SLR

Table 7 Predicted noise levels from the proposed development

Scenario	Receiver Location	Period	LAeq(15 minutes) Noise Level (dBA)			Compliance?
			Project Trigger Level	Predicted	Exceedance	
Cumulative Industrial Noise Sources	R1 – 12 Bringelly Road, Horningsea Park (abandoned condition)	Daytime	51	34	-	Yes
		Evening	43	33	-	Yes
		Night-time	40	33	-	Yes
	R2 – 12 Bringelly Road, Horningsea Park	Daytime	51	45	-	Yes
		Evening	43	34	-	Yes
		Night-time	40	34	-	Yes
	R3 – Properties across Cowpasture Road	Daytime	51	34	-	Yes
		Evening	43	32	-	Yes
		Night-time	40	32	-	Yes
	R4 – Properties to the north	Daytime	44	43	-	Yes
		Evening	41	35	-	Yes
		Night-time	36	35	-	Yes
	R5 – Twenty Sixth Avenue and Stuart Road	Daytime	49	38	-	Yes
		Evening	43	<30	-	Yes
		Night-time	38	<30	-	Yes

Additionally, a comparison has been provided at **Table 8** of the predicted project noise criteria and the potential sleep disturbance noise levels.

Table 8 Summary of Predicted Sleep Disturbance Levels (dBA)

Receiver Location	Source	LAFmax Noise Level (dBA)			Compliance?
		Criteria	Predicted	Exceedance	
R2 – 12 Bringelly Road	Staff arriving. Workshop activities including grinding, welding and roller doors opening (6 – 7 am)	52	45	-	Yes
R4 – Receivers to the north	Staff arriving. Workshop activities including grinding, welding and roller doors opening (6 – 7 am)	52	< 30	-	Yes
R2 – 12 Bringelly Road	Internal Workshop activity (with roller doors closed). Staff arriving and leaving.	52	< 30	-	Yes
R4 – Receivers to the north	Internal Workshop activity (with roller doors closed). Staff arriving and leaving.	52	< 30	-	Yes

The assessment confirms that there will be no adverse acoustic impacts, including no adverse impacts to night time sleep disturbance from noise associated with staff arrival and workshop activities.

Notwithstanding compliance with the relevant requirements, mitigation measures have been recommended, they are:

- Carry out site inductions and work team briefings to create awareness of nearby sensitive receivers and the importance of minimising noise emissions.
- Ensuring any spoil is placed and not dropped into awaiting trucks.
- Establishing load points as far as practicable from sensitive receivers.
- Use of less noise-intensive equipment, where feasible and reasonable.

SLR has concluded that the project will not result in any adverse acoustic impacts.

5.8 Signage

Four business identification signs are proposed. They are integrated into the façade design of the proposed building. 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 **Table 9**). The assessment demonstrates that the proposed signage is appropriate in the circumstances.

Table 9 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 signs are 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 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>	The proposed development is located internally to the Bringelly Road Business Hub site, and accordingly will not be directly adjacent to any surrounding residential areas. The signage is also provided to face towards the south, away from the parklands to the north. On this basis, the proposal is considered acceptable and will not result in any adverse impacts on the surroundings.	Y
<i>Does the proposal obscure or compromise important views?</i>	The proposed signs are located on the surface of the building and 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 surface of the building and 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 is integrated with the building facade 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 typical for an industrial and / or large format retail 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 do not screen unsightliness.	Y
<i>Does the proposal protrude above buildings, structures or tree canopies in the area or locality?</i>	The proposed signs are located on the building and accordingly do not protrude above the building.	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 facade 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 uses proposed.	Y
<i>Have any safety devices, platforms, lighting devices or logos been designed as an</i>	The signage will integrated with the building structure.	Y

Assessment Criteria	Comment	Compliance
<i>integral part of the signage or structure on which it is to be displayed?</i>		
<i>Would illumination affect safety for pedestrians, vehicles or aircraft?</i>	Illumination of the signage 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>	The proposed signage does not interface with any residential or accommodation uses.	Y
<i>Can the intensity of the illumination be adjusted, if necessary?</i>	If necessary, the intensity of illumination could be adjusted. However, a curfew is not proposed.	Y
<i>Is the illumination subject to a curfew?</i>		Y
<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 signage is located flush on the building on which it is proposed.	Y

5.9 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 the potential opportunities for crime created by the proposed development by employing design and place management principles. A CPTED Strategy has been prepared by Ethos Urban and provided at **Appendix L**.

The aims of the CPTED Strategy are to influence the design of 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.*

As part of this DA, the following tasks were undertaken for the purposes of CPTED:

- a review of the *Safer By Design* Manual by the NSW Police Force;
- collection and analysis of local and NSW State crime statistics from the Bureau of Crime Statistics and Research (BOSCAR); and
- a crime risk assessment, in accordance with the current NSW policy and practice, of the following regulation and assessment principles:
 1. Surveillance
 2. Lighting / technical supervision
 3. Territorial reinforcement
 4. Environmental maintenance
 5. Activity and space management
 6. Access control
 7. Design, definition and designation

On the basis of the above, an assessment of the development has determined that the Crime Risk Assessment Rating of the proposal is rated within the ‘low’ category, provided that a number of recommendations are adopted. These have been reproduced as part of the mitigation measures at **Section 6.0**. Overall, the development is considered to be capable of not resulting in any adverse impacts in regards to Crime Prevention Through Environmental Design.

5.10 Visual Impact

The proposed development has been designed to generally align with the indicative built form illustrated in the Concept Plan. 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 has been assessed against the Design Guidelines (**Appendix F**) and is generally consistent with these provisions.
- The site will be separated from dwellings to the east by the future development of Lot 8, and much of the bulk of the development will be masked by future development to the immediate east and west of Lot 6.
- The proposed landscaping strategy will ensure that the proposal will present appropriately to Skyline Crescent.

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

5.11 Bushfire

A Bushfire Protection Assessment has been undertaken (**Appendix M**). The report considers the SEARs and the relevant Bushfire Conditions of Consent prescribed by SSD 6324.

The proposed storage of flammable materials is adequately covered through the application of the 10m Asset protection Zone at the northern boundary of the site.

Additionally, a detailed assessment has been undertaken against the requirements of *Planning for Bushfire Protection 2006*, with specific discussion regarding access to and the provision of water supply for firefighting purpose. A number of acceptable solutions demonstrating that the proposal either complies with, or can comply with the relevant criteria is also provided at **Appendix M**.

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

5.12 Soil and Water

As part of the development, Costin Roe Consulting has provided Engineering Plans at **Appendix H**. These are supported by an Engineering Report provided at **Appendix R**. 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-east of the site. This is consistent with the Concept Plan strategy. On site detention is also proposed in the form of a 480m³ tank at the north-east 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 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.

5.13 Biodiversity

Approvals were granted for the Concept Approval (SSD 6324) prior to the commencement of the *Biodiversity Conservation Act 2017*, and were in accordance with the relevant acts at the time of approval. A BDAR Waiver request has also been provided at **Appendix N** which discusses this matter further.

5.14 Heritage

Aboriginal Heritage

In a letter dated 1 April 2016, the DPE confirmed the satisfaction of Concept Approval Condition B3. This was met with 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 proximate to any State or local heritage items. The DPE'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.

5.15 Air Quality

An Air Quality Management Plan 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. The land immediately surrounding the site is currently vacant, with residential receivers located to the east of the site. This assessment has been provided at **Appendix J**. The assessment of the potential construction and operation impacts is summarised below.

Construction Impacts

Dust in the air is identified as the primary concern. The nearest existing residential receivers are located approximately 160m to the east of the site. SLR have undertaken a preliminary risk assessment given the sensitivity of the surrounding residential receivers, as well as the sensitivity of the general area. 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 Report is recommended to be performed as part of the development of the Construction Environmental Management Plan, with the most appropriate measures adopted.

Operational Impacts

Key potential sources of emissions associated with the operation of the development comprise the products of fuel combustion (including particulates) from onsite vehicle movements, and wind generated dust from disturbed surface (crushed rock road base) at the rear of the building. SLR notes that given that the development will be used for the display of vehicles, the number of vehicle movements and the amount of emissions associated with the onsite fuel combustion will be minor compared to pollutant levels due to traffic on Cowpasture Road. On this basis, the impact of vehicle emissions at the site would be negligible and accordingly acceptable.

In regards to the wind generated dust from disturbed surface, a qualitative risk based assessment has been undertaken. This assessment has considered the sensitivity of surrounding receivers combined with a predicted magnitude of the potential dust impact. In this case, the risk assessment confirms a 'high sensitivity' combined with a 'slight magnitude', and ultimately confirms the proposal to be of 'intermediate / minor significance. In order to

determine no ongoing impacts, a mitigation measure is proposed - *“regular surface maintenance by ensuring material compaction is maintained to form the bound material matrix”*. This has been noted at **Section 6.0**.

5.16 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. Detailed design matters will be confirmed prior to the issue of the relevant Construction Certificate.

5.17 Waste Management

Methods to reduce construction waste are outlined in the Environmental Management Plan at **Appendix P**. This is further discussed at **Section 5.18** below.

Operational waste storage is illustrated on the Architectural Plans at **Appendix B**, and estimates of the waste generated per week are provided at **Appendix U** by CFC Group. This estimate includes details regarding who the waste will be handled by, as well as the nature of different operational waste components as being disposed of to landfilled or recycled. Detailed operational waste management can be provided prior to the issue of a Construction Certificate.

5.18 Construction Impact

An Environmental Management Plan has been prepared by CIP and is provided at **Appendix P**. This report outlines environmental management practices and procedures to be followed during the construction of the works, so as to ensure that no adverse environmental impacts result during construction of the CFC Facility.

Specifically, the report has identified 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 practice; and
- 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 have been identified at **Appendix P** and informed specific control measures contained within a series of ‘Action Plans’. This environmental risk assessment undertakes a detailed analysis of the various potential impacts at the site. This has informed the mitigation measures proposed at **Section 6.0**.

6.0 Mitigation Measures

The collective measures required to mitigate the impacts associated with the proposed works are detailed in **Table 10** below. These measures have been derived from the previous assessment in **Section 5.0** and those detailed in appended consultants' reports.

Table 10 Mitigation Measures

Mitigation Measures
Construction Impacts Construction is to take place in accordance with the Action Plans identified at Appendix P – Environmental Management Plan.
Acoustic Impact - During construction, the project should make use of site inductions and work team briefings to create awareness of nearby sensitive receivers and the importance of minimising noise emissions. - Any spoil is to be placed and not dropped into awaiting trucks. - Load points are to be established as far as practicable from sensitive receivers. - The development is to make use of less noise-intrusive equipment, where feasible and reasonable.
Bushfire Risk Implementation of the APZ.
Crime Prevention Through Environmental Design - Ensure opportunities for natural and incidental surveillance are maintained through effective lighting, access control and environmental maintenance. - Ensure that all proposed landscaping does not create concealment opportunities and restrict sightlines within the site and to the principle site entrance. As such planting within the proposed development should be maintained as follows: - For shrubs and groundcover – not exceed a height of 1m above ground level at maturity - For trees – the underside of canopy should exceed 2m from ground level at maturity - Planting that has a mature height of between 1m and 2m should ideally be avoided or contained to areas not requiring clear sightlines or natural surveillance. - Ensure clear sight lines from the showrooms and offices. - Consult a qualified lighting engineer to ensure the correct lighting is provided to meet (and ideally exceed) minimum Australian and New Zealand Lighting Standards within and around the development to improve surveillance and minimise opportunities for vandalism. - All lighting detail should be in accordance with the Australian Standards and relevant Council policy. - Implement a lighting strategy that includes motion sensor lighting located in strategic places throughout the development. - Consult a security consultant with a Class 2A licence under the <i>Security Industry Act 1997</i> to provide specific advice on placement, installation, monitoring and maintenance of a CCTV network. - Provide the proposed secure fencing around the perimeter of the site to clearly delineate the site's boundaries. - Ensure a prompt response is incorporated within environmental maintenance procedures, particularly in respect to dumping, graffiti and vandalism. - The environmental maintenance procedures of the CFC facility are to be reviewed regularly to ensure ongoing effectiveness. - Use high quality materials for construction to lessen the likelihood of damage and help to reduce maintenance costs. - Control or restrict the use of the site outside of business hours through appropriate management and consider a formal security presence in those times if necessary. In this regard, management procedures / plans are recommended to be prepared and implemented. - The CFC facility is recommended to be secured after hours. - Provide the proposed perimeter fencing and vehicular access points be clear and able to be secured. - Provide restricted access keys or the like to the secure gates / doors at the entrance / exit points of the development to prevent unauthorised entry outside of business hours. - Any proposed fire exits are for emergency use only and doors should be alarmed to alert security. These exits should be brightly lit and free of obstructions to ensure good sightlines to these doors. - Maintain the current design definition as demonstrated in the proposed development. Ensure clarity of ownership and management are clearly understood by users of the development
Air Quality

Mitigation Measures

- During Construction: A detailed review of the mitigation measures at Section 6.2.4 of the Air Quality Report is to be performed as part of the development of the Construction Environmental Management Plan, and then the most appropriate measures adopted.
- During Operation: Regular surface maintenance by ensuring material compaction is maintained to form the bound material matrix.

Traffic and Parking

- Provision for a Green Travel Plan incorporating a Transport Access Guide to be submitted as part of the Construction Certificate documentation.

Water Management

- Proposed water harvesting methods be employed to address water management, as recommended within the Civil Report submitted at **Appendix R**.

Waste

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

Social Impact

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

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 detailed design component in accordance with an approved Concept Plan for the CFC Facility. Various components of the biophysical, social and economic environments have been examined in the Concept Approval, as well as 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 70 jobs in the construction phase of the project;
- result in the direct provision of 80 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; and
- 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. As discussed previously at **Section 5.9**, the proposed development has been designed in accordance with the principles of Crime Prevention Through Environmental Design, and 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 E**. 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 number of different uses which have been demonstrated as being compatible with both one another, and 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 impact.

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; and
- 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 four 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 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; and
- ensuring the delivery of 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 proposal would not have any significant effect on the biological diversity and ecological integrity of the site and its surrounds.

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

This Environmental Impact Statement (EIS) has been prepared to consider the environmental, social and economic impacts of the proposed CFC 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 regard to the biophysical, economic and social considerations, including the principles of ecologically sustainable development, the carrying out of the project is justified on the basis of the following:

- the detailed design of the project has been demonstrated to being entirely 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; and
- the environmental impacts associated with the construction and operation of the CFC 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.