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ENVIRONMENTAL ASSESSMENT
PART 3A PROJECT APPLICATION

DECEMBER 2009

PART 3A PROJECT: PROPOSED PRINTING, WAREHOUSE AND DISTRIBUTION FACILITIES

ENVIRONMENTAL ASSESSMENT

133-145 LENORE DRIVE ERSKINE PARK
LOT 62 DP 1090695
ERSKINE PARK EMPLOYMENT AREA

VOLUME 1

PacLib
MANAGEMENT

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Certification by the Author

Part 3A Environmental Assessment prepared under the *Environmental Planning and Assessment Act, 1979*

Environmental Assessment prepared by:

Name:	Diana Banjanin
Position:	Planning Manager, PacLib Management
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Address:	133 Alexander Street Crows Nest 2065

Project to which Part 3A applies:

Application No:	MP 08_0016
Project:	Proposed Printing, Warehouse and Distribution Facilities
Proponent Name:	Lot 62 Erskine Park Pty Ltd
Proponent Address:	133 Alexander Street Crows Nest 2065
Land to be developed:	Lot 62 DP 1090695 133-145 Lenore Drive Erskine Park
Owner of Land:	Lot 62 Erskine Park Pty Ltd

Certification:

I certify that I have prepared the contents of this document and to the best of my knowledge the assessment:

- Has been prepared in accordance with the requirements of Part 3A of the *Environmental Planning and Assessment Act, 1979* (as amended) and the Regulations 2000 (as amended), and;
- Does not contain false or misleading information.

Signature Diana Banjanin
December 2009

Executive Summary

Purpose of Environmental Assessment

Consent is sought for the approval from the Minister for Planning under Part 3A of the *Environmental Planning and Assessment Act, 1979 (*the *EP&A Act, 1979)* to construct and operate printing, warehouse and distribution facilities at Lenore Drive Erskine Park (Lot 62 DP 1090695). The subject site is located in the Penrith Local Government Area.

The proposed development has a capital investment value of $32.9 million and would generate approximately 80-100 jobs during construction and approximately 178 jobs during operation.

The proposal is classified as a Major Project under Part 3A of the *Environmental Planning and Assessment Act, 1979* because it involves development for the purposes of storage or distribution centres with a capital investment value of more than $30 million, in accordance with Clause 12 of Schedule 1 of *State Environmental Planning Policy (Major Development) 2005 (Major Development SEPP)*. The Director-General, as delegate of the Minister for Planning determined that Part 3A of the *Environmental Planning and Assessment Act, 1979* applied to the proposed development on 24 January 2008.

The printing use component within the warehouse and distribution facility was introduced after the Minister of Planning determined that the original proposal for warehouse storage and distribution facilities is a Major Project pursuant to Part 3A of the *Environmental Planning and Assessment Act, 1979.* Nevertheless Clause 11 of Schedule 1 of *Major Development SEPP* also classifies "printing or publishing" facilities that employ 100 or more people or that have a capital investment value of more than $30 million as a Part 3A Project.

The Minister for Planning is the consent authority for the subject Part 3A Project.

Subject Site

The real property description of the subject site is Lot 62 DP 1090695 and has a street address of 133-145 Lenore Drive Erskine Park. The site is owned by Lot 62 Erskine Park Pty Ltd and has a site area of 13.49 hectares. Easements for transmission and power lines (respectively Integral Energy and Transgrid) burden the rear portion of the property and take up an area of approximately 3 hectares, resulting in 10.52 hectares of land remaining as developable.

The site is bound by Lenore Drive to the south, the rear yards of residential properties of Erskine Park to the north (180 metres away at the closest point) and vacant industrial land to the west. The site to the east is currently being developed into an industrial estate. The subject site is vacant and bulk earthworks have been completed on site, in accordance with development consent issued by Penrith Council on 25 March 2008.

Description of Major Project Application

It is proposed to develop the subject site for printing, warehouse and distribution facilities.

The printing, warehouse and distribution facilities comprise of two separate warehouse buildings, respectively 3,655m^2 and 55,621m^2 in size. The larger building is situated centrally on the site, and will be split into two separate warehouse units, known as Warehouse 2 and Warehouse 3. Warehouse 1 is a free-standing facility.

The smaller building, Warehouse 1, is situated at the front of the site on the southern portion of the site. The smaller building is proposed to be used as a cross-dock warehouse and distribution facility for the receipt, dispatch, storage and distribution of goods.

Warehouse 2 is proposed to be used as a printing, warehouse and distribution facility.

Warehouse 3 is proposed to be used as a warehouse and distribution facility.

Each of the warehouse facilities will accommodate ancillary office space.

Consent is sought to operate each facility 24 hours a day, 7 days a week.

Relevant Legislation and Planning Controls

The following legislation may be applicable to the proposed development.

The following Acts apply to the development:

Environmental Planning and Assessment Act 1979 (EP&A Act, 1979);
National Greenhouse and Energy Reporting Act 2007 (NGER Act, 2007 (Commonwealth);
Protection of the Environment Operations Act 1997 (PEO Act, 1997); and
National Parks and Wildlife Act 1974 (NPW Act, 1974).

The following environmental planning instruments apply to the Part 3A Project Application:

State Environmental Planning Policy (Western Sydney Employment Area) 2009;
State Environmental Planning Policy (Major Development) 2005 (Major Development SEPP);
State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP);
State Environmental Planning Policy No.33- Hazardous and Offensive Development (SEPP No.33);
State Environmental Planning Policy No.55- Remediation of Land (SEPP No.55);
State Environmental Planning Policy No.64- Advertising and Signage (SEPP No.64);
Sydney Regional Environmental Plan No.20- Hawkesbury-Nepean River (No.2- 1997);

The following local planning controls and plans also apply to the Part 3A Project Application:

Penrith Development Control Plan 2006- Erskine Park Employment Area 1996 (PDCP 1996)
Draft Penrith Development Control Plan 2008 (Amendment No.5)
Erskine Business Park- Development Contributions Plan

The site is zoned 4(e1) Employment Restricted pursuant to the *Penrith Local Environmental Plan 1994 (PLEP 1994). State Environmental Planning Policy- Western Sydney Employment Area (Western Sydney Employment Area) 2009 (Western Sydney Employment SEPP)* was gazetted on 21 August 2009, zoning the site IN1 Industrial. The proposed development for printing, warehouse and distribution facilities is permissible with development consent pursuant to *PLEP 1994 and Western Sydney Employment Area SEPP.*

Clause 34 of the *Western Sydney Employment Area SEPP* contains a saving provision to the effect that it does not apply to or in respect of a development application (including a staged development application) made (but not finally determined) before the commencement of this SEPP. As the Major Project Application was lodged prior to the gazettal of the *Western Sydney Employment SEPP* on 1 October 2008, the *Western Sydney Employment SEPP* does not apply to this application. However discussion on the relevance on the *Western Sydney Employment SEPP* has been included.

Director-General Requirements- Key Issues

The key environmental issues identified by the Director-General for assessment in this Environmental Assessment include:

- Layout and Design- demonstrate that the proposal is generally consistent with the *Erskine Park Employment Area Development Control Plan,* and justify any inconsistencies between the proposal and the Development Control Plan;
- Visual- including landscaping, design, set-backs, signage and lighting with particular regard to frontage onto Lenore Drive;
- Traffic- including details of access to the site, details of the traffic volumes likely to be generated during construction and operation; an assessment of the predicted impacts of this traffic on the safety and efficiency of the surrounding road network and car parking requirements;
- Soils and Water- including the proposed erosion and sediment controls (during construction), the proposed stormwater management system, water supply, including consideration of the potential for rainwater harvesting, and wastewater disposal.
- Noise- including construction, operational and traffic noise; and
- Waste.

In addition to the Environmental Assessment addressing the above environmental issues, the Environmental Assessment also takes into account the environmental impacts associated with the printing use of Warehouse 2 which did not form part of the Preliminary Environmental Assessment and resultant Director-General Requirements issued on 10 November 2008. Accordingly a Preliminary Hazard Analysis, Air Impact Assessment and Greenhouse Gas Assessment Reports form supplementary reports of the Environmental Assessment. Discussions with the Department of Planning have confirmed that these additional reports would be required for a complete assessment of the printing facility operation.

Environmental Impacts

The development has been designed to generally comply with the aims, objectives, and provisions of *Penrith Local Environmental Plan 1994 (PLEP1994), Penrith Development Control Plan 2006- Erskine Park Employment Area (PDCP 2006)* and other relevant Council policies and codes. The proposal also supports and is consistent with the *Metropolitan Strategy,* and the *Draft South-Western Regional Strategy.*

The building has been designed to be of high architectural quality, particularly in regard to its presentation to the Lenore Drive frontage and incorporates a high quality landscape plan.

The Part 3A Project would have significant social and economic benefits for the local area through the provision of increased employment opportunities and from the significant capital investment into the Erskine Park Employment Area.

An assessment of all of the environmental issues contained in the Director-General Requirements, indicates that the proposed development is able to be conducted in a manner that would not result in any significant environmental impacts to the amenity of surrounding land users. In this regard, a summary of potential environmental impacts arising from the proposal is summarized below in the form of a risk assessment.

Risk Assessment of Potential Environmental Impacts of the Project

Below is a risk assessment of potential environmental impacts as a result of the proposed development and mitigation strategies to address these impacts.

Contamination- A Phase 1 Environmental Site Assessment was prepared by Consulting Earth Scientists. The report concludes that from a contamination perspective that the site is suitable for commercial/industrial use subject to the undertaking of the works for an area of observed oil spillage and paint disposal that were detected on site. These works were undertaken as part of the initial site preparation for the now completed bulk earthworks. This issue has been previously resolved and is no longer relevant to the Part 3A Project Application.

Aboriginal Heritage- A Cultural Heritage Assessment for the Site was prepared by Navin Officer. A small artifact was discovered resulting in the need for a Section 90 approval under the *National Parks and Wildlife Act 1974* and *National Parks and Wildlife Amendment Act 2001.* Consent to destroy the artifact was granted on 8 April 2008. This issue has been previously resolved and is no longer relevant to the Part 3A Project Application.

Flora and Fauna- There are no flora and fauna impacts associated with this proposal. Penrith Council approved a development application for bulk earthworks on 25 March 2008 (DA 07/1527). Bulk earthworks coupled with associated removal of dams and trees have now been completed. This issue has been previously resolved and is no longer relevant to the Part 3A Project Application.

Traffic and Parking- The proposed parking provision of 246 spaces will satisfy the demands of the printing, warehouse and distribution facilities. The traffic generation of the proposal will not present any adverse traffic implications. The proposed vehicle and truck access and internal circulation are appropriate to the development and comply with current design standards.

Waste- The objectives of the Waste Management Plan will be to avoid creating waste in the first instance, to reuse waste and recycle material off site. There will also be waste water discharge from the printing facility. Management and treatment of waste water produced during the printing process will be discussed in this report and also included in the Waste Management Plan.

Acoustic- Details of all plant and equipment including printing and finishing processes would be reviewed and assessed by an acoustic consultant during the design development phase to ensure that the acoustic requirements for the project can be achieved, and that amenity to residents particularly at night time is not disturbed. Acoustic treatments options to the warehouse have also been recommended. The Acoustic Report also recommends that a Site Operational Noise Management Plan be developed for the site.

Soil and Water- The proposed works have the potential to affect water quality by way of runoff and increased sedimentation. It is proposed to use a train treatment approach to reduce the transfer of pollutants from the site. The following measures are proposed:

- The roof runoff to be separated from the surface runoff;
- A rainwater reuse tank, 100,000 litres capacity, to be installed to capture the roof water for reuse in toilet flushing and irrigation of planter beds and landscaped areas;
- Gross pollutant traps to treat litter and other coarse sediments from the surface runoff prior to discharging into the bio-retention swale; and
- A bio-retention swale to be provided in the landscaped setback fronting Lenore Drive to treat fine particles.

Visual Impact- The proposed development is consistent with the desired future character of the area and will have no significant impact on the visual qualities of the Erskine Park Employment Area. The limited visual impacts of the development will be mitigated through architectural design, setbacks, landscaping and ultimately future development of adjoining properties. The presentation to Lenore Drive has been

addressed positively through site layout, landscape design and high quality architectural treatment utilising a combination of materials and finishes to the buildings. In addition a landscape buffer is proposed to the rear of the site on land on the edge of the Transgrid easement, in front of the residents in order to shield the proposed development from the view of the residents.

Specific Risk Assessment- Printing Facility

Air Impact- The proposed printing, distribution and warehouse facility contributes a very low to negligible concentration of pollutants to the environment and complies with legislation limits. The air quality report prepared for Warehouse 2 by Benbow Environmental recommends that the following safeguards be placed to maintain good air quality:

- Regular maintenance of dryer burners;
- Maintain good environmental housekeeping within the facility, eg Removal of any build up dust from trim cutters; routine use of floor sweepers to remove trim not captured by the trim collection system, routine removal of dust from horizontal surfaces, and routine removal of dust within the pelletiser area to prevent its accumulation on horizontal surfaces.
- Properly maintained ventilation of the printing press area ensuring natural ventilation louvres are not blocked;
- Maintain trafficked areas free of dust; and
- Maintenance of roadway surfaces.

Hazards- Benbow Environmental have concluded that due to the nature of the printing operations in Warehouse 2, there would be no increase in hazardous risks to the existing or future occupants of the industrial area. The proposed site and its operation meet all the safety requirements and is not considered to be an offensive or hazardous development. The operation of the proposed development meets the criteria provided in the *SEPP 33* Screening Thresholds and would not cause any risk to the community.

The proposed design and operation of the facility would include environmental safeguards to provide sufficient protection to the site such that if a pollution incident occurred there would be minimal impact to the natural environment or nuisance caused to the amenity of the adjacent occupiers of neighbouring premises. The environmental safeguards include inter alia, spill control procedure, the use of chemical spill kits, protocols for personnel entering hazardous area zones, ventilation of work areas, reporting environmental incidents, preventative maintenance on environmental management equipment, fire management, emergency response procedure, emergency evacuation procedures, environmental housekeeping and training of a first response fire crew.

Greenhouse Gases- The results of the greenhouse gas calculations indicate that operation of the proposed facility would generate the equivalent of 15,023.9 tonnes of carbon dioxide less than the use of existing printing operations in Clayton Victoria and Moorebank NSW which has been used as a model. The majority of this saving would be achieved through the installation of more modern and energy efficient equipment that would significantly reduce the electricity consumption. The new equipment would reduce energy consumption by approximately 1 to 3%. There would also be storage space available to store finished product within the new printing facility and this would eliminate the need to transport printed material to a separate warehouse.

Nevertheless a Greenhouse Gas Action Plan is recommended to be implemented at the facility. The Greenhouse Gas Action Plan would require a:

- Base Year GHG Inventory;
- Verification of the Base Year GHG Inventory by an independent third party;
- Annual reporting of GHG emissions in accordance with NGER Legislation;
- Identification of activities to reduce GHG emissions or increase GHG removals; and

- Implementation of identified opportunities to enable reduction in GHG emissions and/or increase in GHG removals.

The information contained in the Environmental Assessment demonstrates that the Part 3A Project Application will not result in any adverse environmental impacts which can not be mitigated or managed through the implementation of appropriate strategies in the construction and operation stages of the development.

The Environmental Assessment concludes that the site is suitable for the project and the proposed project is consistent with the Public Interest.

Introduction & Background

1.1 Overview

The Environmental Assessment is submitted to the Department of Planning to accompany a Part 3A Project Application for Printing, Warehouse and Distribution Facilities situated on Lot 62 DP 1090695, 133-145 Lenore Drive Erskine Park.

The Environmental Assessment is prepared in accordance with the Department of Planning's Guidelines for Major Project Applications lodged under Part 3A of the *Environmental Planning and Assessment Act*, *1979* and addresses the issues raised in the Director-General's Requirements issued on 10 November 2008. The Environmental Assessment also adds supplementary information in relation to the printing facility, which has been introduced to the Major Project Application following receipt of the Director-General Requirements. The Environmental Assessment includes "Statement of Commitments" which sets out the undertakings to manage and minimise any potential environmental impacts resulting from the proposed development.

1.2 Background

The subject site is located on the northern side of Lenore Drive Erskine Park within the Erskine Park Employment Area, and has a total site area of 13.49 hectares. The Erskine Park Employment Area covers 540 hectares and was rezoned in 1993 as a major employment area for Western Sydney. The site is now part of a significant area of land currently being transformed into a major industrial precinct.

The Erskine Park Employment Area now forms part of the Western Sydney Employment Area (Precinct 7), identified in the Sydney Metropolitan Strategy as a key centre for employment growth in Western Sydney.

1.3 Structure of Environmental Assessment

The environmental assessment includes the following information relevant to the Part 3A Project Application:

- Introduction & Background;
- Site Analysis & Description;
- Project Overview;
- Legislative Framework- Compliance with Relevant Acts, Environmental Planning Instruments, Planning Controls and Consultation;
- Environmental Assessment of the proposal in accordance with the Director- General's Environmental Assessment Requirements under Part 3A of the *Environmental Planning and Assessment Act,* 1979;
- Statement of Commitments;
- Project Justification and Consideration of Alternatives;
- Conclusion

Table 1 below provides a summary of the Director-General Requirements and cross-references their location in the Environmental Assessment Report.

Table 1: List of Director-General Requirements

DIRECTOR-GENERAL'S REQUIREMENTS	LOCATION IN REPORT
The Environmental Assessment must include:	

• An executive summary
• A detailed description of the project including the:
  ○ Need for the project
  ○ Alternatives considered;
  ○ Likely staging of the project; and
  ○ Plans of any proposed building works.
	Executive Summary
	Section 2
	Section 6

• A risk assessment of the potential environmental impacts of the project identifying the key issues for further assessment;	**Executive Summary** **Section 5**

• A detailed assessment of the key issues specified below and any other significant issues identified in the risk assessment (see above) which includes:
  ○ A description of the existing environment, using sufficient baseline data;
  ○ An assessment of the potential impacts of all stages of the project including any cumulative impacts, taking into consideration any relevant guidelines, policies, plans and statutory provisions; and
  ○ A description of the measures that would be implemented to avoid, minimize, mitigate, rehabilitate/remediate, monitor, and/or offset the potential impacts of the project, including detailed contingency plans for managing any potentially significant risks to the environment;
	Section 5
	Section 2
	Section 5
	Section 5

• A statement of commitments, outlining all the proposed environmental management and monitoring measures;	**Section 6**
• A conclusion justifying the project on economic, social and environmental grounds, taking into consideration whether the project is consistent with the objects of the *Environmental Planning and Assessment Act 1979;*	**Section 8**
• A signed statement from the author of the Environmental Assessment, certifying that the information contained within the document is neither false nor misleading.	**Refer Certification from Author**
KEY ISSUES	
LAYOUT/DESIGN- Demonstrate that the proposal is generally consistent with the Erskine Park Employment Area Development Control Plan and justify any inconsistencies between the proposal and the DCP.	**Section 5**

VISUAL- including landscaping, design, setback, signage and lighting with particular regard to frontage onto Lenore Drive.	**Section 5**
TRAFFIC- including details of access to the site, details of the traffic volumes likely to be generated during construction and operation; an assessment of the predicted impacts of the traffic on the safety and efficiency of the surrounding road network and car parking requirements.	**Section 5**
SOIL AND WATER- including the proposed erosion and sediment controls (during construction); the proposed stormwater management system; water supply; including consideration of the potential for rainwater harvesting and wastewater disposal.	**Section 5**
NOISE- including construction, operational and traffic noise; and	**Section 5**
WASTE	**Section 5**

1.4 The Major Project Application

It is proposed to develop the subject site for printing, warehouse and distribution facilities.

The printing, warehouse and distribution facilities comprise of two separate warehouse buildings, respectively 3,655m^2 in size and 55,621m^2 in size, resulting in a total gross floor area of 59,276m^2. Each of the warehouse facilities will accommodate ancillary office space.

The smaller building, known as Warehouse 1 is situated at the front on the southern portion of the site. The larger building comprises of Warehouse 2 and Warehouse 3. Warehouse 2 is proposed to be used as a printing, warehouse and distribution facility. Warehouse 3 is proposed to be used either as additional storage for Warehouse 2 or to accommodate an unspecified warehouse and distribution user.

Truck loading and unloading areas are provided on both the eastern and western sides of Warehouse 1 and on the eastern side of the larger building (Warehouse 2 and Warehouse 3) to minimise streetscape impact. A total of 246 carspaces have been provided on site, coupled with a total of 40 loading docks across both buildings.

The proposed site coverage is 47.8%, complying with the maximum 50% site coverage.

Consent is sought to operate each facility 24 hours a day, 7 days a week.

It is expected that a total of approximately 178 people will be employed in the facilities based on indicative tenant interest and will create between 80-100 jobs during construction.

1.5 End Users

The smaller building is proposed to be used as a cross-dock warehouse and distribution facility for the receipt, dispatch, storage and distribution of goods. Warehouse 2 and 3 has been designed as a printing, warehouse and distribution facility. The end users for the proposed development have not been determined yet, however the design has been based on the specific requirements of indicative tenants.

1.6 Major Project Process

On 10 January 2008 PacLib Management wrote to the Director-General requesting that the Department of Planning recommend that the proposed development of Lot 62 DP 1090695 be declared by an Order of the Minister pursuant to Section 75B(1) of the *Environmental Planning and Assessment Act, 1979* to be a project to which Part 3A of the *Environmental Planning & Assessment Act* applies.

On 24 January 2008, the Minister declared that development for employment/industrial purposes on Lot 62 DP 1090695, Erskine Park is a project to which Part 3A of the *Environmental Planning & Assessment Act 1979* applies.

To support the request for the Director-General's Requirements relating to the Environmental Assessment, a Preliminary Assessment relating to the project was submitted on 29 September 2008.

On 10 November 2008, in accordance with Section 75F of the *Environmental Planning & Assessment Act, 1979*, the Director-General of the Department of Planning issued the requirements for the preparation of an Environmental Assessment for the Project.

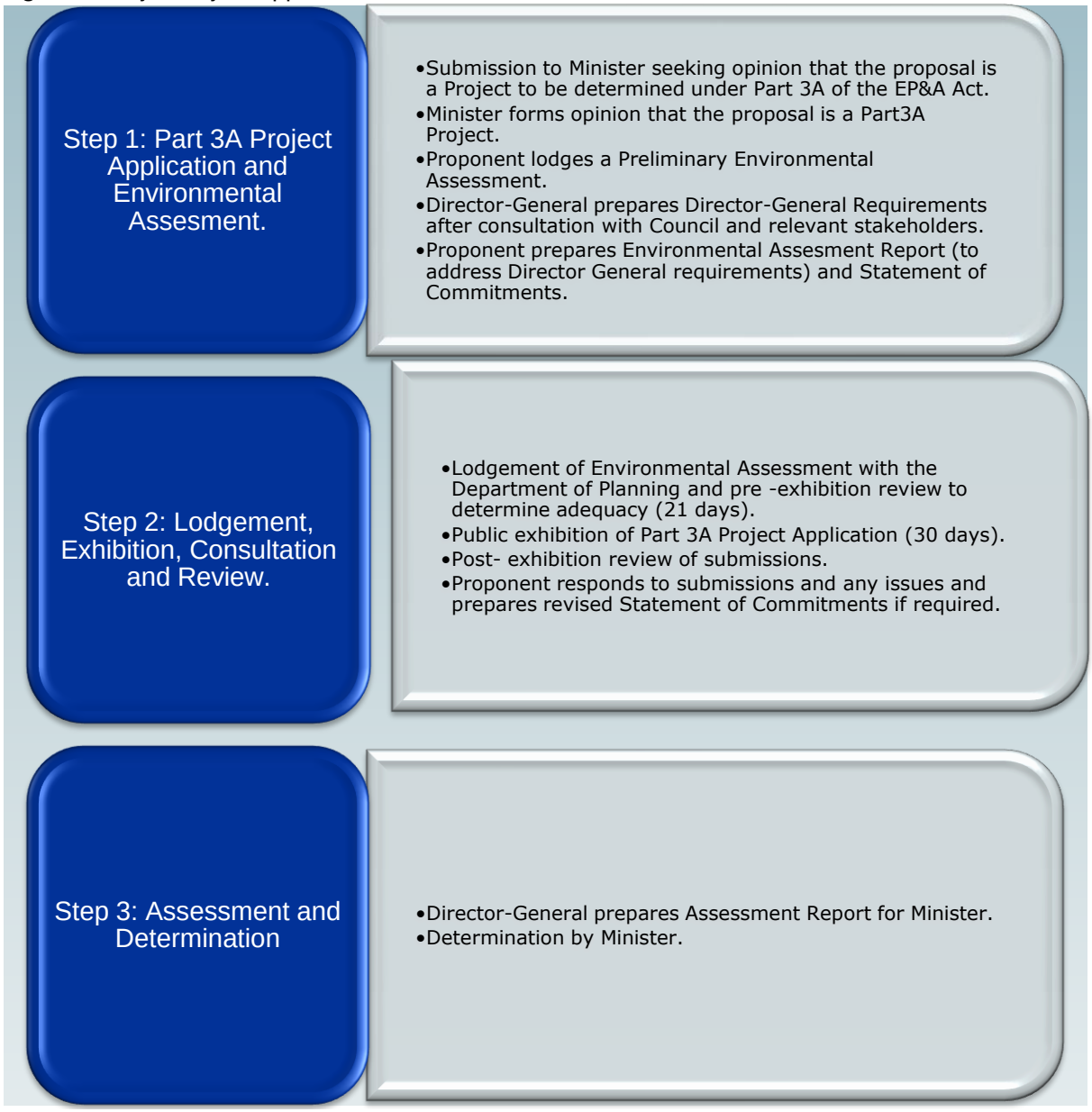
A copy of the Director-General's Requirements is included in **Appendix 1.**

This report and appended documentation constitutes the Environmental Assessment Report for the Project Application.

The original Environmental Assessment report was submitted on 9 April 2009. The Department of Planning responded to the issues on 15 May 2009. The subject report forms the revised Environmental Assessment accounting for recent amendments made to the proposal (amendment to the design of the office to Warehouse 1) and comments on outstanding issues.

Figure 1 below indicates the Part 3A Project Approval Process Timeline.

Figure 1: Major Project Approval Process



1.7 Consultant Team

In preparation of this Major Project submission, the following specialist consultants have provided input or relevant technical documents:

- Environmental Assessment Preparation, Town Planning and Project Management- PacLib Management
- Architectural Drawings- Paclib Industrial
- Visual Assessment Report- PacLib Industrial
- Traffic and Parking Implications Assessment Report- Transport & Traffic Planning Associates
- Landscape Drawings- Environmental Partnership
- Operational Noise Assessment Report- Atkins Acoustics
- Stormwater Management Drawings- S & G Consultants Pty Ltd
- Stormwater Management Strategy Report- S & G Consultants Pty Ltd
- Preliminary Hazard Analysis- Benbow Environmental
- Greenhouse Gases Report- Benbow Environmental
- Air Impact Assessment Report- Benbow Environmental
- Waste Management Plan- Paclib Management

The above consultant reports address the Director-General's Requirements for the Environmental Assessment. The reports prepared by Benbow Environmental following the issued Director- General Requirements are based on the fact that the warehouse and distribution facility includes a printing facility component warranting further environmental assessment.

The specialist reports provide a technical assessment of the environmental impact of the Project and recommend proposed mitigation measures to manage potential environmental impacts associated with the Project. The Statement of Commitments will apply the recommendations made in consultant reports and documentation, together with compliance with relevant legislation, Australian Standards and the Building Code of Australia.

1.8 Authority Consultation

In preparation of this application, PacLib Group has consulted with a number of authorities:

- Department of Planning in relation to the applicability of Part 3A of the *Environmental Planning and Assessment Act, 1979* and the scope of the project;
- Penrith Council in relation to the scope of the project and the relevant environmental planning instruments, development control plans and guidelines/policies; and
- NSW Roads and Traffic Authority.

2. Site Analysis and Description

2.1 Location and Context

The site is located on the northern side of Lenore Drive Erskine Park within the Erskine Park Employment Area. Erskine Park is located in Western Sydney, approximately 45 kilometres from the Sydney Central Business District and 12 kilometres south-east of the Penrith town centre. The site is located in the Penrith Local Government Area.

The Erskine Park Employment Area is bound by the rural residential areas of Erskine Park and St Clair to the north of the site, the Warragamba-Prospect Water Supply Line to the south, Ropes Creek to the east and Mamre Road to the west. The Erskine Park Employment Area comprises a total area of 510 hectares, of which 276 hectares is developable.

The need for new land releases in Sydney's west to provide employment opportunities for new residential communities has been a key feature of successful metropolitan planning strategies including *Sydney Region Outline Plan in 1968*, *Sydney into its Third Century in 1988*, *Shaping our Cities and Shaping Western Sydney* both in 1998. The recent strategy document, *City of Cities- A Plan for Sydney's future The Sydney Metropolitan Strategy* released in December 2005 is the over arching plan for Sydney's future over the next 25 years. A target for 100,000 new jobs has been set for the North-West sector including the Penrith Local Government Area.

The Strategy identifies the Erskine Park Employment Area to be regionally important for future job creation aimed to significantly assist in achieving the Metropolitan Strategy's job targets. Having the benefit of current zoning for employment generating uses, Erskine Park is immediately ready to fulfill state government planning objectives.

The Erskine Park Employment Area now forms part of the "Western Sydney Employment Area", identified in the Sydney Metropolitan Strategy as a key centre for employment growth in Western Sydney. The Erskine Park Employment Area has become an important regional hub for major logistics and distribution facilities. The subject site is located within Precinct 7 (Erskine Park) of the "Western Sydney Employment Hub".

Major Project projects that have been approved by the Minister in the vicinity of the subject site include:

- Bluescope Steel Paintline and Service Centre (DA-206-8-2004-i) capital cost of $170 million approved December 2004 and now constructed.
- Woolworths Data Centre (MP 08-0109) capital cost of $43 million approved on 15 December 2008.

In addition Penrith Council have approved the "Strand Bags" warehouse and distribution facility at 24-66 Lockwood Road (DA 07/0522) at a capital cost of $18 million approved on 28 September 2007 and now constructed.

Refer to Figures **2** to **5** indicating location and context of the subject site.

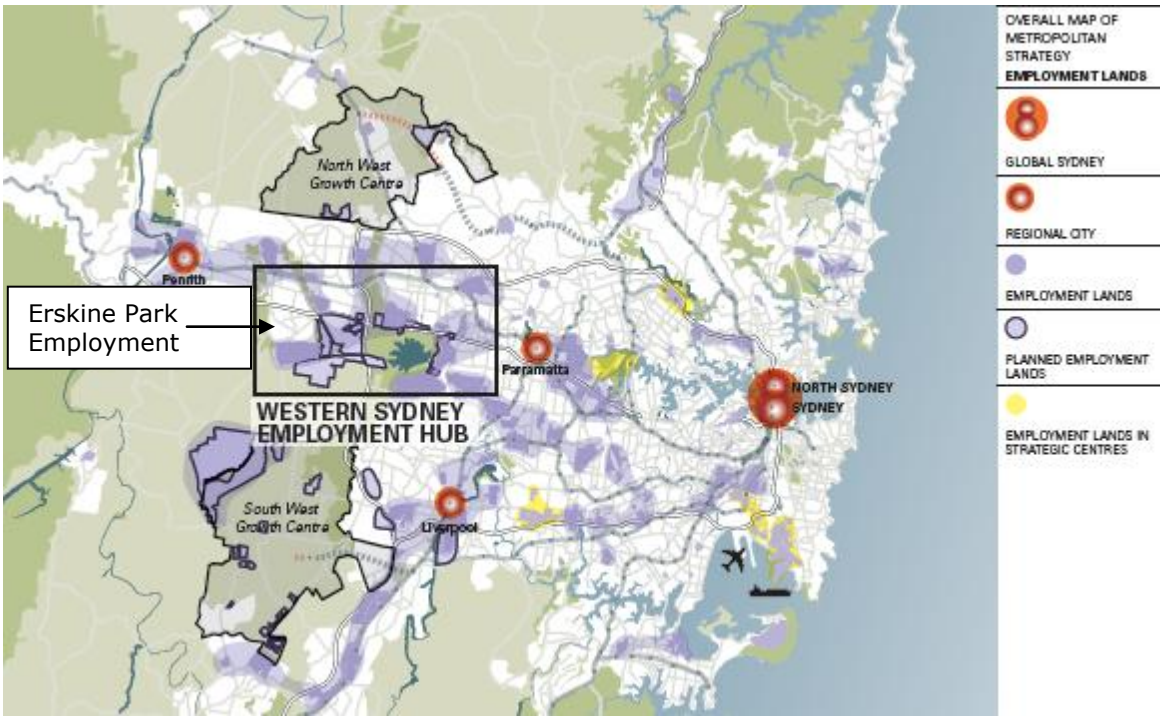


Figure 2: Location of Erskine Park Employment Area in Sydney. Reference: *Sydney's strategic centres and employment land",* Metropolitan Strategy, Department of Planning, March 2007.

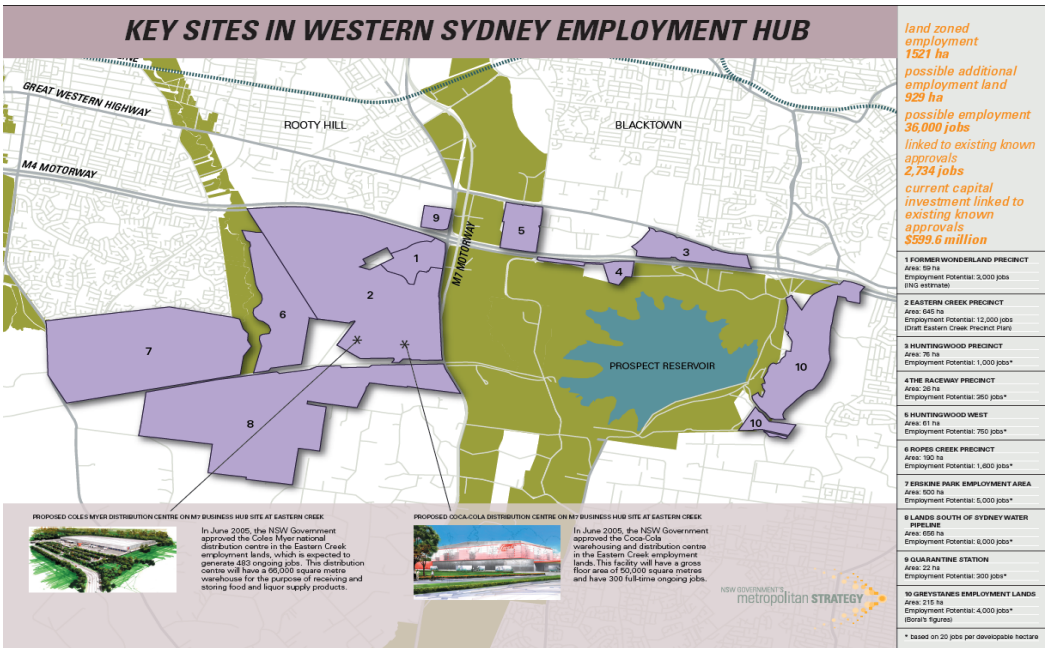


Figure 3: *Key Sites in Western Sydney Employment Hub*, Extract. Department of Planning, March 2008.

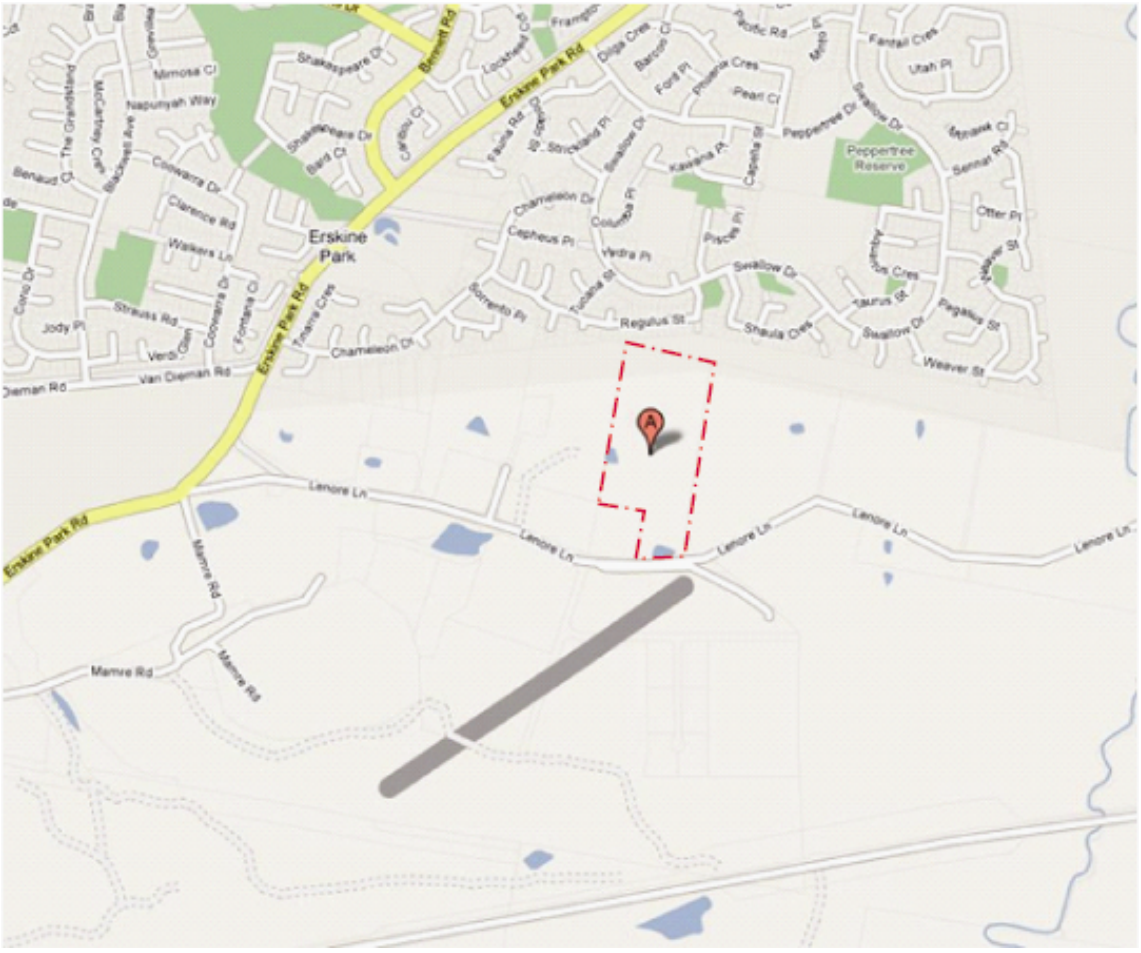


Figure 4: Subject site located on Lenore Drive.

Figure 5- Aerial photograph of subject site, taken July 2009. Source Paclib Group.

2.2 Property Description and Ownership

The real property description of the subject site is Lot 62 DP 1090695 and has a street address of 133-145 Lenore Drive Erskine Park. The site is currently owned by Lot 62 Erskine Park Pty Ltd.

The site is a "L" shaped allotment, with a frontage of approximately 114.2 metres to Lenore Drive, and a depth of 753.4 metres, resulting in a total site area of 13.49 hectares.

Lot 63 DP 1090695 which contains the residence of Frank Blackwell (with some outbuildings) is located to the west, and does not form part of the subject site. Blackwell was the owner of the subject site until it was sold in mid 2008 to Lot 62 Erskine Park Pty Ltd to be used as future industrial development, consistent with the employment zoning.

The site is bound by Lenore Drive to the south, a vacant parcel of land soon to be developed as an industrial estate by FDC Constructions is located to the east, a vacant parcel of land to the west owned by Valad Property Group and the rear yards of residential properties of Erskine Park are located to the north beyond the transmission easements approximately 180 metres away at the closest point.

Easements for transmission and power lines (respectively Integral Energy and Transgrid) burden the rear portion of the property (adjoining residential properties to the north) and occupy an area of approximately 3 hectares. The Integral Energy easement is the southern most easement whilst the Transgrid easement adjoins the residential properties.10.52 hectares of land remains as developable. Integral Energy and Transgrid have given their consent to work within their easements.

The site is zoned 4(e1) Employment Restricted pursuant to the *Penrith Local Environmental Plan 1994 (PLEP 1994). State Environmental Planning Policy- Western Sydney Employment Area (Western Sydney Employment Area SEPP)* was gazette on 21 August 2009, zoning the site IN1 Industrial. The proposed development for printing, warehouse and distribution facilities is permissible with development consent pursuant to *PLEP 1994 and Western Sydney Employment Area SEPP.*

Bulk earthworks in accordance with development consent DA07/1527.01 approved by Penrith Council have been completed.

2.3 Surrounding Landuse

The land use surrounding the site reflects the changing urban landscape associated with the development of the Erskine Park Employment Area. Existing industrial development is located generally on the southern side of Lenore Drive and to the west of the subject site. Existing developments in the vicinity of the site include warehouse and distribution facilities for CSR, Coil Steels, BlueScope Steel, Strandbags and Corporate Express.

Photographs of the subject site and local context are shown in **Figures 6** to **15.**

Figure 6- View south of subject site

Figure 7- View generally south-west of subject site towards “Strandbags” and “Bluescope” developments.

Figure 8- View south of the subject site, taken from the residential boundary.

Figure 9- View north beyond transmission easement to the rear of residential properties in Regulus St.

Figure 10- View of electrical transmission easements, separating the developable portion of the site from the rear of residential property boundaries, located approx 180 m away from proposed building.

Figure 11- View north of subject site, note two building pads.

Figure 12- View of "Strandbags" development to the south of Lenore Drive.

Figure 13- View east of Lenore Drive.

Figure 14- View west down Lenore Drive.

Figure 15- View south from the residential properties in Regulus Street.

2.4 Access and Road Network

The subject site enjoys excellent access to Sydney's arterial road network. The existing road network serving the vicinity of the site comprises of:

- The M4 Motorway- a State Road and arterial route linking Concord and Penrith;
- The Great Western Highway- a State Road and arterial road route which provides a connection between the City and the Blue Mountains Crossing;
- Erskine Park Road extends to the north to become Roper Road at Minchinbury and later Carlisle Avenue at Mount Druitt;
- Mamre Road- a State Road and a sub-arterial road linking between the Great Western Highway and Elizabeth Drive; and Lenore Drive- a collector road route connecting to Erskine Park Road, which is proposed to be extended to connect with the M7 Motorway. The link road forms part of a larger road network project for the Western Sydney Employment Hub which is being facilitated by the RTA (Major Project No.06-0166).

Access to the site is from Lenore Drive located on the southern side of the boundary. It is proposed to construct a new vehicular access driveway to serve Warehouse 2 and Warehouse 3. The existing driveway on the western boundary will be upgraded to serve Warehouse 1.

2.5 Site Conditions

2.5.1 Bulk Earthworks

A development application for Bulk Earthworks has been approved by Penrith City Council on 25 March 2008 (DA07/1527)- refer **Appendix 2**. The bulk earthworks approved the creation of two building pads which form the central and south western sections of the site, and included removal of the two dams that existed on site.

Existing ground levels through most of this area ranged from RL 61 to RL 56.5, resulting in the need for cut and fill. The larger building pad through the centre of the site was originally approved to be set at RL 63.95 whilst the smaller building pad in proximity to Lenore Drive was originally set at RL 59.80. A Section 96(1a) application was approved by Penrith Council on 21 January 2009 to lower the levels by 900mm, resulting in the RL of the smaller pad to reduce to RL 59.5 and the larger pad to RL 63.6.

Bulk earthworks have now been completed on site.

2.5.2 Contamination

A Phase 1 Environmental Site Assessment has been prepared by Consulting Earth Scientists. The report concluded that from a contamination perspective that the site is suitable for commercial/industrial use subject to the undertaking of the following works for an area of observed oil spillage and paint disposal. These works were to:

- Excavate visually impacted material;
- Engage a suitably qualified environmental consultant is engaged to undertake visual and analytical validation of the excavation; and
- Prepare a report detailing that impacted material has been adequately removed and excavations validated to a standard suitable for commercial industrial land use.

In accordance with the recommendation of the report, these works were undertaken as part of the initial site preparation for the bulk earthworks.

2.5.3 Aboriginal Heritage

A Cultural Heritage Assessment for the Site has been prepared by Navin Officer. It has been noted that the site fell within the boundaries and areas of four Aboriginal organisations- the Deerubbin Local Aboriginal Land Council, the Darug Tribal Aboriginal Corporation, the Darug Custodians Aboriginal Corporation, and the Darug Aboriginal Cultural Heritage Assessments. An isolated artifact was identified on site towards the north-east corner of the site. The artifact was a poorly formed, red silcrete, flaked piece, measuring approximately 30 x 15 x 3 cm. As a result, a permit under Section 90 of the *National Parks and Wildlife Act 1974* and the *National Parks and Wildlife Amendment Act 2001*, from the Director-General of the Department of Environment and Climate Change was approved on 8 April 2008 to allow this artifact to be destroyed. As this issue has been previously resolved prior to commencing bulk earthworks on site, it is no longer relevant to the assessment of the Major Project Application.

2.5.4 Flora and Fauna

There are no flora and fauna impacts as bulk earthworks have been completed on site in accordance with development consent DA07/1527 approved by Penrith Council on 25 March 2008.

2.6 Services

There are no significant site constraints to undertaking this Major Project. The existing site services available to the site, including electricity, gas, communications, water and reticulated sewer would adequately service the project without the need for significant augmentation or upgrade.

2.6.1 Stormwater Drainage

The site is currently drained through a pipe culvert crossing under the neighbouring site's driveway on the south-west corner. The pipe discharges into an open swale fronting Lenore Drive into a large culvert system crossing to the other side of Lenore Drive.

Stormwater drainage from the site would be connected to existing stormwater infrastructure in Lenore Drive and is described in the attached Stormwater Management Plan.

2.6.2 Water

There is an existing Sydney Water Corporation 300mm pipe in Lenore Drive which is available for connection and is adequate to service the development.

Water conservation measures will be applied in the form of reticulated rainwater harvested for grey water use. Clean discharge from internal waste water equipment (from the printing facility) will be directed to the rainwater harvesting tank for reuse.

2.6.3 Sewer

The extension to Sydney Water's sewer has been designed and is in the process of being constructed (Sydney Water Case Number 114466WW). A cost-share agreement has been put into place with the owners of the property to the east.

2.6.4 Electricity

The proposed printing, warehouse and distribution facilities are able to be serviced from the Erskine Park Mamre Road Substation located just north of the subject site. The project also includes a number of passive and active energy savings measures to reduce energy use associated with the facilities.

3. Part 3A Project Overview

3.1 Project Description

It is proposed to develop the subject site as follows:

Warehouse 1

- Operation of 3,655m^2 freestanding cross-dock warehouse and distribution facility for receipt, dispatch, storage and distribution of goods (Warehouse 1) incorporating:
  - 3,095m^2 of warehouse space;
  - 560m^2 of ancillary office space;
  - 24 car spaces located in the south-west corner; accessed by existing driveway (to be upgraded);
  - 16 at-grade loading docks split between 8 loading docks to the east and west of the building;
  - Business identification signage;
  - Paved staff outdoor area with further access to break out space into the landscape setback zone;
  - Areas of hardstand for truck loading to the western and eastern sides of building;
  - Shared truck entry/exit with Warehouse 2/3;
  - Staff amenities;
  - Finished floor level of 59.80+-500mm;
  - 21 metre awning
  - Landscape screening between carpark and loading areas; and
  - 24/7 hours per day operation.

Warehouse 2

- Operation of 42,560m^2 printing, warehouse and distribution facility (part of a 55,621m^2 building) the printing, storage and distribution of print material incorporating:
  - 40,888m^2 of warehouse space;
  - 1200m^2 of ancillary office/support facilities split over two stories with 545m^2 located on ground floor;
  - 40m^2 despatch office;
  - Separate areas for publishing, pressing, warehouse, workshop, paper storage areas;
  - 200 carspaces located to the east of the facility and on southern perimeter accessed by eastern driveway;
  - 12 at-grade and 4 sunken loading docks- incorporating 2 side loading for ink deliveries and waste compactor pick up;
  - Outdoor staff area connected to office;
  - Plant substation and 400m^2 waste disposal/recycling located to the west of the facility;
  - Business Identification Signage;
  - Finished floor level of 63.60+-500mm;
  - 15 metre awning;
  - Night time drop off zone for unloading/loading goods, shielded by 3 metre high acoustic blade wall; and
  - 24/7 hours per day operation.

Warehouse 3

- Operation of 13,061m^2 warehouse and distribution facility for receipt, dispatch, storage and distribution of goods to be used as a warehouse and distribution facility.
    - 12,888m^2 warehouse space;
    - 173m^2 ancillary office space;
    - 45 carspaces located in north east corner;
    - 6 at-grade and 2 sunken loading docks, generally located on eastern elevation;
    - Location for proposed Business identification signage;
    - Staff outdoor area;
    - Finished floor level of 63.60+-500mm;
    - 10 metre awning; and
    - 24/7 hours per day operation.

The development incorporates fire sprinkler tanks and pump room in the north-east corner of the site to service the development. In addition the development requires the construction of utilities and services connections from adjacent locations to the site.

Table 2 provides a description of the development. Refer to **Appendix 3** for a copy of architectural drawings.

Table 2- Description of Development

	Warehouse 1	Warehouse 2	Warehouse 3
Use	Warehouse and distribution facility	Printing, warehouse and distribution facility	Warehouse and distribution facility
Site Area	134,906m^2		
Gross Floor Area- warehouses and office	3,655m^2 (GFA) 3,095m^2 warehouse with 560m^2 office	42560m^2 (GFA) 40880m^2 warehouse 1200m^2 office 440m^2 plant and substation 40m^2 despatch	13061m^2 (GFA) 12888m^2 warehouse 173m^2 office
Total Gross Floor Area	59,276m^2		
Finished Floor Level	RL 59.8 +/- 500mm	RL 63.60 +/- 500mm	
Building Height	12.06 metres to the ridge of Warehouse 1	12.98 metres to the ridge of Warehouse 2 and 3	
Carparking spaces	24	177	45
Loading docks	16	16	8
Employees during operation	17	Expected 147 employees during operation split into 2 shifts.	14
Employees during construction	Approximately 80-100 during construction		
Hours of operation	24/7		
Size of Awning	6,026m^2		
Site Cover	47.8%		
Target Completion Date	Early 2011	Early 2011	To be determined. 5 year timeframe.

Figure 16- Overall Site plan

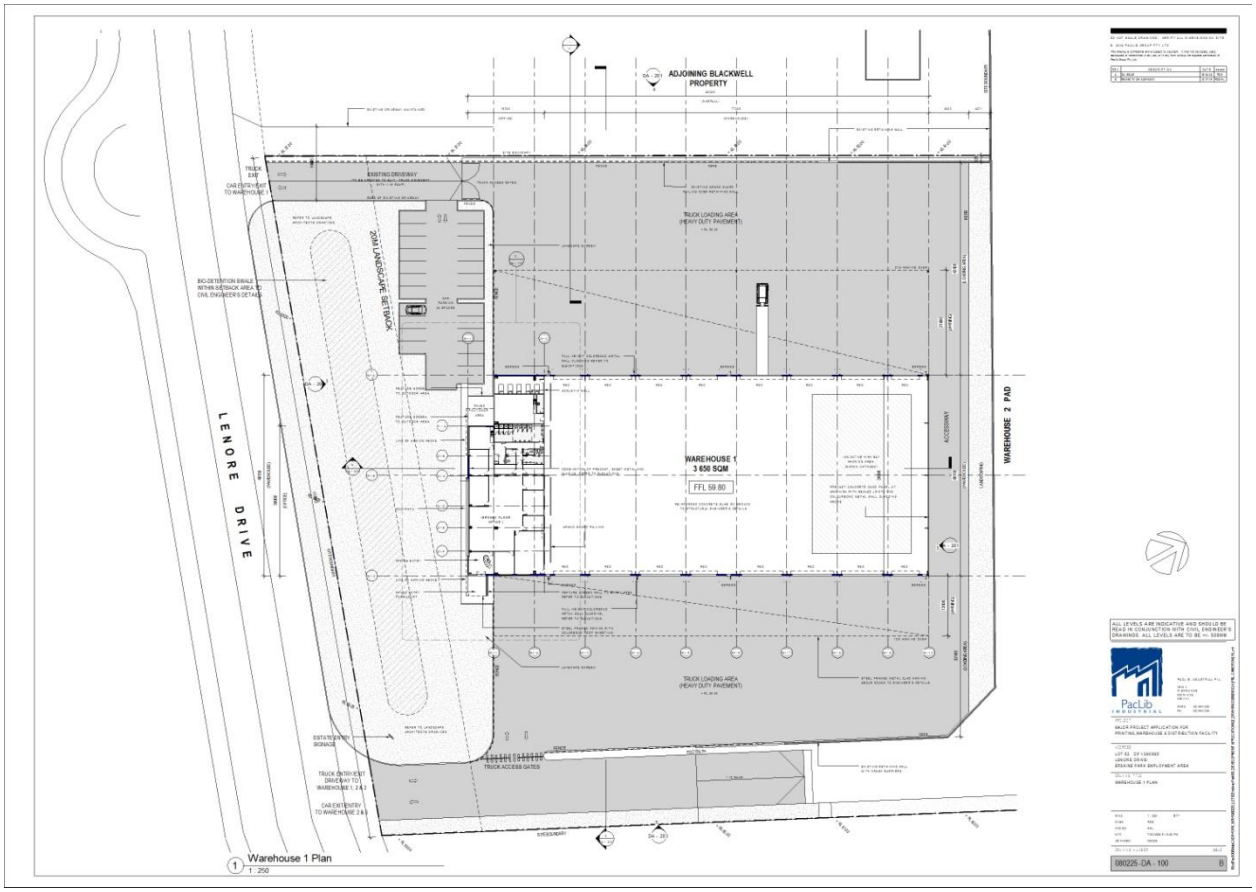


Figure 17- Site plan- Warehouse 1

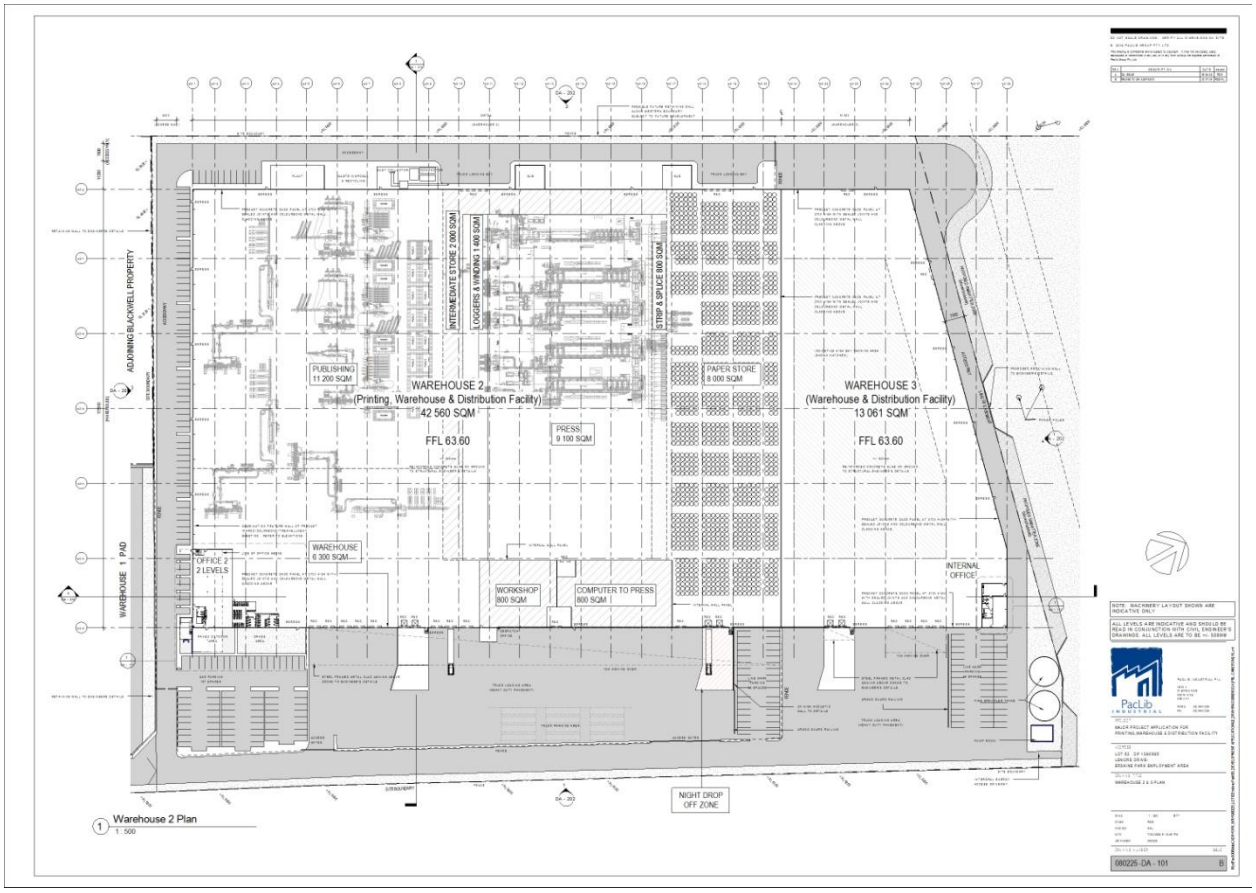


Figure 18- Site plan of Warehouse 2 and 3- showing fitout of printing facility.

3.2 Capital Investment Value

The estimated capital investment value of the project is $32.9 million. The original Clause 6 letter issued by the Department of Planning confirms the Major Project status of this development. The original proposal comprised of a 46,090m^2 warehouse and distribution facility with ancillary office space of 2,615m^2 with the provision for 325 car spaces. The proposed development is similar to the scheme previously endorsed as a Major Project by the Department of Planning and also reflected in the Preliminary Environmental Assessment, with the major difference being the incorporation of the printing use and an increase in floor space area, responding to tenant requirements (original proposal was based on speculative tenants).

3.3 Employment Numbers and Hours of Operation

It is proposed that the printing, warehouse and distribution facilities will operate 24 hours a day 7 days per week. It is envisaged that in the order of approximately 180 staff in total will be employed on site in the warehouse & distribution facilities. The number of staff have been based on requirements from specific tenants.

It is likely that Warehouse 1 will employ approximately 17 staff.

It is likely that Warehouse 2 will employ approximately 147 staff, split into the following areas:

- Printing facility- (24/7, 2 shifts) split between:
  Warehouse- 33 staff
  Publishing- 76 staff
  Press- 25 staff
  Paper Store- 4 staff
  Computer to plate- 2 staff
  Office- 7 staff (operating 7am to 5pm, 7 days per week).

It is likely that Warehouse 3 will accommodate 14 staff, split between 12 in the warehouse and 2 staff in the office.

3.4 Employment Numbers and Construction Hours

It is expected that the development will employ approximately 80-120 people during construction.

Construction works would be undertaken within the Department of Environment and Climate Change (DECC's) *Environmental Noise Control Manual,* namely:

- 7:00am to 6:00pm Monday to Friday;
- 8:00am to 1:00pm Saturdays; and
- No work on Sundays or public holidays.

3.5 Staging/Timing

It is proposed to commence construction mid 2010. The proposed development will be constructed in three stages:

Stage 1- Printing, Warehouse and Distribution Facility (Warehouse 2)
Stage 2- Warehouse and Distribution Facility (Warehouse 1)
Stage 3- Warehouse and Distribution Facility (Warehouse 3)

The printing, warehouse and distribution facility (Warehouse 2) will require 6 months to fit-out the building before occupation with completion expected mid 2011.

Warehouse 1 will be constructed at the same time as Warehouse 2 and completion targeted for 2011.

It is requested that any the Part 3A Project consent issued by the Department of Planning reflect the ability to construct the development in stages in no specified order, and not restrict the staging of Construction and Occupation Certificates accordingly.

3.6 Proposed Uses

Warehouse 1

The warehouse building will accommodate the receipt, dispatch, storage and distribution of goods and provide areas for administration, internal offices, staff facilities and amenities. Goods are delivered by road transport and then put into high-bay racks (stored) or cross-docked with delivery to clients/customers by road transport.

Warehouse 2

The warehouse building will be used as a printing, warehouse and distribution facility and accommodates the following areas:

- Publishing 11,200m^2
- Paper Store 8,000m^2
- Warehouse 6,200m^2
- Press 9,100m^2
- Computer to Press 800m^2
- Workshop 800m^2
- Intermediate Store 2000m^2
- Loggers and Winding 1400m^2
- Office 1200m^2
- Strip and Splice 800m^2

The printing process is described as follows:

1. **Delivery of Materials**

Raw materials of paper and ink are delivered by heavy vehicles and stored within the warehouse. A paper storage area will store rolls of high quality paper.

The ink will be delivered by road tanker, accessing the printing facility by side loading on the western side. The road tanker would be parked in an open area with drive up ramp and sump to contain 110% of the largest compartment volume of the road tanker.

The printing processes require 120 tonnes of ink to be stored on site in ink farm. The tank farm will be isolated from the building by either fire rated walls or separation distances in accordance with AS1940-2004 *The Storage and Handling of Flammable and Combustible Liquids.*

The ink is transferred by pumps to the dispensing stations and application rolls on the printer. Steel welded piping would be used in the transfer of inks.

2. Web Offset printing

It is proposed that 5 web offset printers would be used all the time while the 2 other smaller web offset printers may be used in the future. Each printer contains a number of unit operations that have a specific role in achieving the required quality of the printed material. These are listed as follows:

- Paper web feed
- Ink fountain
- Dampening system
- Plate and blanket cylinders
- Dryer
- Chilled Rollers
- Trimmers

A continuous roll of paper is fed into the printing press. The ink is then distributed to printers through a series of rollers. The image would then be transferred onto the paper via a rubber blanket. The web offset printing method that would be used is the “heatset” process where the ink is dried rapidly in a gas fired oven at temperatures between 176 and 206 degrees. This allows a better image transfer compared to ordinary plate printing.

The exhaust gases would be re-circulated along with natural gas used to maintain the operating temperatures of the dryers. This process to destroy most of the Volatile Organic Compounds (VOC) contained in the exhaust gas limiting the release of VOC to the environment.

The printed paper then passes through a dryer (to enhance solvent evaporation) and after it is then cooled through a chilled roller. Leftover ink would then be collected and removed to the waste disposal and recycling area.

3. Finishing, Binding and Stitching

After the paper is printed, pages are separated and cut to size. The printed paper would be put together so that the pages fall in the correct order. Pages would then be bound together to form the finished product. The magazine folding and stitching operation generates minor quantities of dust. The area is needed to be kept to a high standard of cleanliness to remove paper dust and to maximize the operating efficiencies of the printing equipment.

Part of the warehouse would be used to store rolls of high quality paper. The rolls are each 2 tonne and would be stored up to 10 metres high. Forklifts fitted with reel grabs are used to undertake the unloading of the rolls from the trucks.

The rolls are placed on a conveyor that enables them to be shifted onto the unwinders at the start of the web offset printer.

4. Finished Goods Storage and Distribution

Printed material would then be stored vertically within a warehouse on site ready for distribution to retailers. The printing process generates trim when the printed paper is cut to size. The trim is withdrawn from the printing process using fans that place a duct under vacuum. The trim is chopped to length by these fans so that the trim may be transferred along the long length of ducting without blocking the ducting.

Paper waste from trimming and splicing is then collected and compacted with a pelletiser and removed to the waste disposal and recycling area. The waste paper conversion area needs to be cleaned regularly not only to ensure there is low risk of fire or dust explosion, but also to maintain an immaculate production environment. The opportunity for a dust explosion are rare given the nature of the dust being particle offcuts.

Warehouse 3

Warehouse 3 will also be used as a warehouse and distribution facility and will accommodate the receipt, dispatch, storage and distribution of goods and provide areas for administration, internal offices, staff facilities and amenities. Goods are delivered by road transport and then put into high-bay racks (stored) with delivery to clients/customers by road transport.

3.7 Architectural Design

The proposed facilities have been designed in-house by PacLib Group's Architectural Team. The buildings exhibit a high standard of architectural design and will utilize a variety of materials and finishes to provide a varied and articulated presentation to Lenore Drive.

External finishes for the proposed building are shown on the submitted drawings and sample boards. The warehouse walls would comprise a combination of precast concrete panels and colourbond metal wall cladding. The roof would comprise of colourbond roof sheeting with 10% transclucent roof sheeting. The office façades of each building incorporate precast concrete dado panels, colourbond metallic cladding, glazing, and colourbond roof sheeting.

Finishes and materials selected all contribute to reduce the perceived mass of the warehouse buildings. The chosen palette of colours are generally consistent with those required by the *Erskine Park Development Control Plan 2006*- that is browns, muted greens, sand, dark red/plums and cool tones such as soft greys and grey/blues, whilst also incorporating the corporate colours of tenants.

Reflectivity will be managed through the use of external materials that do not exceed 20%.

An Architectural Design Statement has been prepared by PacLib Group's Chief Architect:

> *"Industrial buildings represent buildings of strong form and scale. In creating a concept for this design development, our approach was to not only focus on the aspects of form and scale, but also address the conventional operations of industrial warehousing and more importantly the context of the site to the surrounds.*
>
> *Since the introduction of the M2 and M7 together with the Interchange ring road at Eastern Creek, Erskine Park industrial precinct has become an accessible and viable option for business to relocate to the area. Currently the Industrial Park has a number of buildings erected signifying the demand of new Industrial facilities and displaying an array of contemporary architectural designs. Our design for the designated site aims to add value to the precinct.*
>
> *The site is bound by neighbouring industrial developments, transmission power easements and a residential precinct. These factors together with the natural ground level fall on the site set precedent to our scheme which was to stagger the development in the form of two building platforms. The intent was to reduce exposure to the resident precinct to the north and increase site exposure to the south being Lenore Drive - the spine of the Erskine Park Industrial development. In developing two staggered platforms it allowed the development to minimise material import and export of soil whilst also controlling water management on site.*
>
> *Overall buildings have been designed to comply with local development codes of the area in terms of setbacks, building heights and other general requirements. Our design also aims to implement further suggestions put forward from Penrith Council in our pre-lodgement meeting in regards to traffic movement.*

The materials selected for the buildings are typical to the Industrial palette; however particular attention to detail was given to the facades fronting Lenore Drive. Warehouse walls are a combination of concrete panels with a series of cascading metal sheeting laid in an overlapping manner. The intent was to further express texture, scale and form, through the use of colour, shapes and shadows. Offices inherit similar material characteristics as that of the warehouses (which form a backdrop to the offices) in doing so our aim was to present a coherent architectural expression to Lenore Drive.

Overall we are confident that the industrial estate contained within the site represents a unique architectural design outcome which addresses the requirements set out by Council, clients and constraints dictated by the site. In doing so we are certain that this development will add value to the Erskine Park industrial precinct, and will represent a well thought out functional development for years to come."

Details of the proposed building materials, colours and architectural forms are provided on the architectural drawings- Refer **Appendix 3.**

Figures 19 and **20** below indicate perspectives of the completed building.

Figure 19- Perspective of Warehouse 1: view of office entry from Lenore Drive.

Figure 20- Perspective of Warehouse 2/3

3.8 Landscape Design

Environmental Partnership have prepared a Detailed Landscape Plan for the proposed development which has been designed in regard to Penrith Council's landscape design requirements, Refer **Appendix 4.** The proposed plant material has been selected for robustness, ease of maintenance and proven ability in the area. Landscaping will also be provided within the carpark areas. Plants will be low maintenance, provide shade and colour and soften the appearance of the carpark.

Key aspects of the landscape proposal as indicated on the Landscape Development Plan include:

- A planted basin within the landscape setback zone to integrate within the bio-swale along the Lenore Drive frontage. A planted buffer zone adjoins the bio-swale comprising native tree and shrub canopy;
- Shade tree planting to carpark islands;
- Landscaping to staff outdoor spaces;
- Native shrubs and native grass plantings along the western allotment boundary; and
- Native buffer tree plantings adjoining the eastern allotment boundary and the north-east corner.

In addition to the landscape plan for the development, a landscaped buffer is proposed on land to the north of the subject property within the Transgrid easement. FDC who are developing the property to the east, are proposing a similar buffer treatment, and it is proposed to extend this landscape treatment behind the subject site.

The landscape buffer will comprise of plantings of approximately 4 metres in height, 2 metres in width and will shield the development from the view of Erskine Park residents located to the north of the subject property.

Details of the landscape buffer indicating species of vegetation to be planted will be provided for the Department of Planning's approval prior to Construction Certificate.

3.9 Business Identification Signage

The end users of the proposed development will require business identification signage and directional signage. The proposed signage will be high quality finish, front lit, and will be compatible with the proposed materials and finishes of the development.

The location for business identification signage is shown on the drawings. Specific business identification signage for tenants will be the subject to further details although indicative signage for prospective tenants has been designed.

An estate sign is also proposed at the front of the property and the location is shown on the drawings. The proposed size of the estate sign is 3000mm x 1250mm.

An assessment of the proposed signage is contained in Section 4.4.6.

3.10 Outdoor Lighting

Proposed outdoor lighting includes functional lighting for the safety, security and efficient operation of the facility. The outdoor lighting will be perimeter lighting, designed to light exit doors and driveways.

Provision will be made for external lighting during the detailed design phase and will comply with relevant requirements of "*Control of Obtrusive Effects of Outdoor Lighting"* (Australian Standards AS 4282) and will be down lit so to have minimal light spillage onto adjoining properties.

3.11 Access

Access to the site is proposed from Lenore Drive located on the southern side of the boundary. It is proposed to construct a new vehicular access driveway for cars and trucks to serve Warehouse 2 and Warehouse 3. The existing driveway on the eastern boundary will be upgraded to serve Warehouse 1. The access and parking arrangements have been designed with reference to Australian Standards in relation to heavy vehicle requirements. The driveways will be located on a straight section of Lenore Drive where suitable sight distances will be available.

All facilities provide for trucks and cars to enter and leave in a forward direction with generous internal hardstand to enable efficient truck access and circulation. The facilities also provide adequate internal truck parking/queuing spaces with no reliance on off-street parking/queuing.

A vehicle turning area is proposed to be constructed in the north-western part of the site to enable trucks accessing Warehouse 2 for waste compactor collection and ink drop off (once a day only), omitting the need to travel around the perimeter of Warehouse 3. The turning area has been designed to facilitate a 19 metre semi-trailer to turnaround. The truck turning area encroaches into an easement owned by Integral Energy. Approval from Integral Energy has been granted.

3.12 Parking

A total of 246 car spaces will be provided on site. The RTA Guidelines require 199 spaces to be provided, based on 1 per 300m^2 of gross floor area of warehouse uses and includes ancillary office uses (as the floor area of ancillary office space is less than 20%). Initially, the proposal included an additional 23 spaces have since been removed from the proposal in order to avoid any perceived conflict of car movements in proximity to loading areas.

The Traffic and Parking Implications Assessment Report prepared by Transport and Traffic Planning Associates (**Appendix 5**) supports that the warehouse rate be adopted for the proposed printing, warehouse and distribution facilities as the employment density of the printing component is similar of that of a warehouse due to the space requirements of printing machinery and large areas required for printed material storage. These adopted rates provide a realistic parking demand rather than relying purely on Council's Development Control Plan which would result in an excessive parking provision beyond tenant requirements.

3.13 Truck Volumes

The table below provides a summary of truck movements for each warehouse unit, based on information provided by indicative tenants.

Table 3- Truck Movements- Logistics Company (Warehouse 1)

Time (Monday- Friday)	Vehicle Types	Details of Loads
6am to 7pm	B Doubles (From Interstate)	3 inbound per hour between 6am- 10am. 3 outbound per hour between 3pm -7pm.
	Semi Trailers (From Interstate)	1 inbound per hour between 6am – 10am. 1 inbound per hour between 3pm- 7pm.
	Semi Trailers (Local)	1 inbound per hour spread throughout the day. 1 outbound per hour spread throughout the day.
	Rigid Trucks- 12 Tonne (Local)	1 inbound every 2 hours between 7am and 5pm. 1 outbound every 2 hours between 7am and 5pm.
	Rigid Trucks- 8 Tonne (Local)	1 inbound every 2 hours between 7am and 5pm. 1 outbound every 2 hours between 7am and 5pm.
	Rigid Trucks- 6 Tonne (Local)	1 inbound every 3 hours between 7am and 5pm. 1 outbound every 3 hours between 7am and 5pm.
	Rigid Trucks- 4/5 Tonne (Local)	6 inbound between 7am and 5pm. 6 outbound between 7am and 5pm.
	Vans- 1.5 Tonne (Local)	

		1 inbound occasionally. 1 outbound occasionally.
7pm- 6am	Semi Trailers (Inter-state)	1 every 4 hours
Time (Weekends)	**Vehicle Types**	**Details of Loads**
7am- 5pm	Semi Trailers (Inter-state)	1 in late afternoon

Table 4: Truck Movements- Warehouse 2- Printing, Warehouse & Distribution Facility

Time (Monday- Friday)	Vehicle Type	Details of Loads
7am- 5pm	Semi-Trailers (Local)	3 inbound per hour 3 outbound per hour
5pm- 7am	Container trucks	1 inbound every 2 hours
TIME (Sunday) * No work Saturdays	**Vehicle Type**	**Details of Loads**
7am- 5pm	Semi-Trailers (Local)	1 inbound per hour 1 outbound per hour
5pm-7am	Container trucks	1 inbound every 2 hours

Table 5: Truck movements- Warehouse 3- Warehouse and Distribution User

Time (Monday- Friday)	Vehicle Type	Details of Loads
7am- 5pm	Semi-Trailers (Local)	1 inbound per hour 1 outbound per hour
5pm- 7am	Container Trucks	1 inbound every 2 hours
Time (Weekends)	**Vehicle Type**	**Details of Loads**
7am- 5pm	Semi-Trailers (Local)	1 inbound per hour 1 outbound per hour
5pm- 7am	Container Trucks	1 inbound every 2 hours

3.14 Ecologically Sustainable Development

The *Environmental Planning and Assessment Act 1979* adopts the definition in the *Protection of the Environment Administration Act 1991 (PEA Act,1991).* Section 6(2) of the Act states that Ecologically Sustainable Development (ESD) "*requires the effective integration of economic and environmental considerations in decision-making processes"* and that Ecologically Sustainable Development "*can be achieved through the implementation of the principles and programs including the precautionary principle, the price of inter-generational equity, the principle of conservation of biological diversity and ecological integrity, and the principle of improved valuation, pricing and incentive mechanisms".*

The Part 3A Project supports ecologically sustainable development principles as encouraged by state and local government legislation and policies. The following measures will be implemented in the design of the building and on-going use of the printing, warehouse and distribution facilities:

- Utilising energy efficient lighting and the use of water efficient equipment/appliances in buildings;
- Incorporating 10% translucent sheeting to the roof to allow natural light into the warehouses;
- Designing offices to maximize natural lighting through the use of glazing and installation of sunshading devices;
- Ensuring that development will be consistent with the principles of waste minimization- ensuring that waste is minimized through reuse, recycling and reprocessing. Also once buildings are completed, encouraging tenants to reuse and recycle waste during operation;
- Incorporating a Stormwater Management Strategy addressing the control of discharge from the site, water quality and water usage management (including the incorporation of pollution control devices to control off site water quality impacts);
- Reducing dust and particulate generation during construction particularly from bulk earthworks, wind erosion from stockpiles, truck movements on unpaved surfaces (adoption of technical practices including good site management, vehicle maintenance), the application of dust mitigation, and soil erosion and sedimentation management measures (in accordance with "Blue Book" government guidelines);
- Water conservation in order to conserve potable water as far as practicable: harvesting roof runoff through a rainwater collection system and used for non-potable uses such as irrigation on landscaped gardens on site, toilet flushing and truck washing.

The Part 3A Project will comply with Section J of the *Building Code of Australia* in regard to Energy Efficiency.

A Greenhouse Gas report has also been prepared in regard to the printing operation and discusses obligations pursuant to the *National Greenhouse and Energy Reporting Act 2007 (NGER Act, 2007).*

The applicant is committed to the principles of Ecologically Sustainable Development and this has been reinforced through the Statement of Commitments.

3.15 Waste Management

A Waste Management Plan has been submitted with the application. The objectives of the Waste Management Plan are to avoid creating waste in the first instance, to reuse waste, and recycle material off site. In addition the Waste Management Plan nominates areas for the storage and collection of wastes and recyclables on site.

The printing facility component has been designed to generate less than 8% waste, which is less than the current printing facilities used (which currently generates 15% waste). Paper offcuts and trim are recycled and any ink cartridges are returned to the supplier for reuse. Clean discharge from internal waste water equipment will be directed to the rainwater harvesting tank for reuse.

4.0 Legislative Framework- Compliance with Relevant Acts, Environmental Planning Instruments, Planning Controls and Consultation.

4.1 Overview of Relevant Acts applying to the site

4.1.1 Environmental Planning and Assessment Act, 1979 (NSW)

Part 3A of the *Environmental Planning & Assessment Act, 1979* outlines the process for Part 3A Major Project Applications. In particular it outlines:

- What development constitutes a Part 3A Project;
- The matters which the Minister must take into account when assessing a Part 3A Project Application;
- Information which must be submitted with a Part 3A Project Application;
- The Environmental Assessment Requirements for Approval;
- Public Exhibition of Part 3A Project Applications;
- Assessment Report Procedures; and
- Appeals under Part 3A.

The proposal is classified as a Major Project under Part 3A of the *Environmental Planning And Assessment Act, 1979* because it involves development for the purpose of storage or distribution centres with a capital investment value of more than $30 million, in accordance with Clause 12 of Schedule 1 of *State Environmental Planning Policy (Major Projects) 2005*. The Director-General, as delegate of the Minister for Planning determined that Part 3A applied on 24 January 2008.

Further, given the introduction of the printing facility component to the warehouse and distribution development after the Minister of Planning determined that the proposal is a Major Project Application, the printing facility would also trigger Clause 11 of Schedule 1 of *Major Projects SEPP*. Clause 11 of *Major Development SEPP* classifies "printing or publishing" facilities that employ 100 or more people or have a capital investment value of more than $30 million as a Part 3A Project.

The proposed use for printing, warehouse and distribution is permissible in accordance with zone 4(e1)- "Employment-Restricted" pursuant to *Penrith Local Environmental Plan (Erskine Park Employment Area) 1994.* The *Western Sydney Employment Area SEPP* commenced on 21 August 2009, and zones the subject site IN1 Industrial.

Clause 34 of the *Western Sydney Employment Area SEPP* contains a savings provision to the effect that it does not apply to or in respect of a development application (including a staged development application) made (but not finally determined) before the commencement of this Policy. Given that this application was lodged on 1 October 2008, prior to the gazettal of the *Western Sydney Employment Area SEPP*, the SEPP does not apply.

Nevertheless the SEPP has been considered in this assessment as it is relevant to the proposal. The proposed printing, warehouse and distribution facilities remain permissible as "industry", "warehouse" and "distribution centre" are permissible uses. The proposed development is not offensive or hazardous pursuant to *SEPP 3*3 and *Hazardous Industry Planning Advisory Paper No.6- Guidelines for Hazard Analysis (HIPAP No.6)* and *Multi Level Risk Assessment.*

4.1.2 National Greenhouse and Energy Reporting Act 2007 (NGER Act, 2007) (Commonwealth)

The National Greenhouse and Energy Reporting Act 2007 (NGER Act) administered by the Commonwealth Department of Climate Change establishes a structure for corporations to report greenhouse gas emissions and energy consumption and production from 1 July 2008.

Section 3 of the *National Greenhouse and Energy Reporting Act* defines the object of the *Act*, being to: "*introduce a single national reporting framework for the reporting and dissemination of information related to greenhouse gas emissions, greenhouse gas projects, energy consumption and energy production of corporations to:*

a) underpin the introduction of an emissions trading scheme in the future;
b) inform government policy formulation and the Australian public;
c) meet Australia's international reporting obligations;
d) assist Commonwealth, State and Territory government programs and activities;
e) avoid the duplication of similar reporting requirements in the States and Territories".

Under the *NGER Act*, corporations are required to apply for registration with the Greenhouse and Energy Data Officer if their associated greenhouse gas emissions or energy consumption levels are above defined threshold for a financial reporting year.

The Determination under the *NGER Act* sets out the following general principles for measuring emissions:

- **Transparency-** Emission estimates must be documented and verifiable.
- **Comparability**- Emission estimates using a particular method and produced by a registered corporation in an industry sector must be comparable with emission estimates produced by similar corporations in that industry sector using the same method and consistent with the emission estimates published by the Department of Climate Change in the National Greenhouse Accounts.
- **Accuracy-** Having regard to the availability of reasonable resources by a registered corporation and the requirements of the Determination, uncertainties in emission estimates must be minimised and any estimates must neither be over nor under estimates of the true values at a 95 per cent confidence level.
- **Completeness-** All identifiable emission sources within the energy, industrial process and waste sectors as identified by the *National Inventory Report* must be accounted for.

The *NGER Act* also requires that estimates of greenhouse gas emissions and energy production and consumption are to be prepared in accordance with these principles.

A Greenhouse Gas Report has been prepared by Benbow Environmental **(Appendix 6)** to address energy production and consumption. Full analysis of the results of the Greenhouse Gas Report can be found at Section 5.2.2. In summary, the results of the greenhouse gas calculations indicate that operation of the proposed facility would generate 15,023.9 tonnes of carbon dioxide equivalent less than the use of existing printing operations. The majority of this saving would be achieved through the installation of more modern and energy efficient equipment that would significantly reduce the electricity consumption. A Greenhouse Gas Action Plan has also been recommended to be implemented at the facility. This issue will be reflected in the Statement of Commitments.

4.1.3. Protection of the Environment Operations Act, 1997 (NSW) (PEO Act, 1997)

The objects of this Act are as follows:
(a) to protect, restore and enhance the quality of the environment in New South Wales, having regard to the need to maintain ecologically sustainable development,
(b) to provide increased opportunities for public involvement and participation in environment protection,
(c) to ensure that the community has access to relevant and meaningful information about pollution,
(d) to reduce risks to human health and prevent the degradation of the environment by the use of mechanisms that promote the following:

(i) pollution prevention and cleaner production,
(ii) the reduction to harmless levels of the discharge of substances likely to cause harm to the environment,
(iia) the elimination of harmful wastes,
(iii) the reduction in the use of materials and the re-use, recovery or recycling of materials,
(iv) the making of progressive environmental improvements, including the reduction of pollution at source,
(v) the monitoring and reporting of environmental quality on a regular basis,

(e) to rationalise, simplify and strengthen the regulatory framework for environment protection,
(f) to improve the efficiency of administration of the environment protection legislation,
(g) to assist in the achievement of the objectives of the Waste Avoidance and Resource Recovery Act 2001.

All activities conducted at the site during construction and operation will be controlled so to comply with *POEA Act, 1997.* Issues of noise, waste, air quality, water quality are discussed further in the report.

The NSW Environmental Protection Agency issues licenses under the *Protection of the Environment Operations Act 1997 (NSW*). The licences are used to control the acute, localised and cumulative impact of pollution on the environment.

Clause 32 of Schedule 1 of the *Protection of the Environment Operations Act* specifies that a license is required for a scheduled activity for any printing, packaging or visual communications activity that involves having on site at any one time more than 5 tonnes of prescribed waste (where 1,000 litres is taken to weigh 1 tonne). As about 1,000 litres of solvent are used daily, a license is not required for the printing facility component based on waste quantities.

4.1.4 National Parks and Wildlife Act, 1974 (NSW) (NPW Act)

The *National Parks and Wildlife Act 1974 (NPW Act)* provides the primary basis for the legal protection and management of Aboriginal sites and relics within NSW. Any land containing Aboriginal cultural heritage impacted by future development would be subject to an application for “consent to destroy” under section 90 of the *NPW Act*. Although a Section 90 application is not required for a Part 3A Project applications, this matter has already been handled as a result of bulk earthworks development application approved by Penrith Council on 25 March 2008. A consent to destroy application was approved on 8 April 2008.

4.2 Overview of Relevant Environmental Planning Instruments

Section 75(2) of the *Environmental Planning & Assessment Act 1979* requires that the Director-General's assessment report consider the provisions of State Environmental Planning Policies and other environmental planning instruments relevant to the project. The following planning instruments, development control plans and planning policy documents are of key relevance to the application.

The applicable environmental planning instruments are:

State Environmental Planning Policy Western Sydney Employment Area (Western Sydney Employment Area SEPP);
State Environmental Planning Policy Major Development 2005 (Major Development SEPP);
State Environmental Planning Policy Infrastructure 2007 (Infrastructure SEPP);
State Environmental Planning Policy No.33- Hazardous & Offensive Development (SEPP No. 33);
State Environmental Planning Policy No.55- Remediation of Land (SEPP No. 55);
State Environmental Planning Policy No.64- Advertising and Signage (SEPP No. 64);
Sydney Regional Environmental Plan (SREP) No.20- Hawkesbury-Nepean River (SREP No.20); and
Penrith Local Environmental Plan (Erskine Park Employment Area) 1994 (PLEP1994);

The applicable development control plans and other Council policies are:

Penrith Development Control Plan 2006 (Penrith DCP)- Section 6.14- Erskine Park Employment Area;
Penrith Erskine Business Section 94 Contributions Plan

4.3 Consultation

In accordance with Part 3A of the *EP&A Act, 1979,* consultation is required at the following stages:

- The Director-General of the Department is required to consult with relevant authorities in preparing the Director- General requirements for the Major Project Application;
- The Director-General is required to advertise and exhibit the Environmental Assessment and documentation. Refer to **Figure 1** which explains the Major Project Application Process.

In preparing the Director-General Requirements for the Environmental Assessment, the Department of Planning consulted with the following assessment authorities:

- Penrith City Council
- NSW Roads and Traffic Authority.

Comments and responses raised by these authorities and groups were considered in preparing the Director General Requirements are summarized in **Table 5**. The proponent has also had several discussions with the Department of Planning and Penrith Council on the proposal between January 2008 and July 2009.

Table 6 summarises the key issues/responses from the consultation.

Table 6- Summary of Comments from Authorities

PENRITH COUNCIL COMMENTS	ACTION
• Use and operation of a warehouse and distribution facility, including the erection of two separate warehouse buildings;	Noted
• Operation on a 24 hour/7 day per week basis, however it is anticipated that future use on site would consider acoustic issue on assessment;	Noted
• A total of 120 parking spaces would be provided for the entire site. An additional 65 spaces shown as provisional spaces are able to be accommodated on site if required by a future user. These spaces are consistent with the Roads and Traffic Authority Guidelines only;	Noted
• Extensive landscaping to be provided throughout setback and car parking areas.	Noted
• The proposal is split into 3 stages. Each of the warehouse buildings may be constructed prior to Warehouses 2 and 3, or vice versa depending on which is pre-committed by a tenant first.	Noted
• The maximum building height permitted in the 4(e1) zone is 12 metres. The maximum building height proposed is 12.98 metres. The preliminary environmental assessment has justified the departure to the development control.	Refer further discussion below. The height of Warehouse 2/3 building is unchanged. The height of Warehouse 1 has increased from 11 metres in the Preliminary Environmental Assessment to 12.06 metres.
• Of concern to Council is that the site is an irregular shape providing a hatchet type lot as a result of the retention of the Blackwell property to the south-west. It is Council's preference that the Blackwell site be consolidated with the subject site for reasons outlined in the following points:- • The consolidation of the two sites would enable a direct vehicular access point to the Templar Road/Lenore Drive intersection. This would ensure unrestricted access to Lenore Drive in each direction as opposed to the anticipated left in, left out intersection that would be proposed. • The construction of a separate driveway from Lenore Drive would be highly undesirable given the potential proliferation of separate driveways along Lenore Drive. It should be noted that Council is currently in receipt of Development	The preference has always been to amalgamate the Blackwell property with the subject site. It is not possible to force a landholder to sell their property even though amalgamation with the subject site may be desirable from a Council viewpoint. Nevertheless it is considered that the development has been designed with high architectural merit and presentation to Lenore Drive.

Application for PMA Solutions directly east of the subject site which proposes the construction of an estate road in that DA. • The proposed development is considered to have its external appearance to Lenore Drive blighted by the unsightly manner of the Blackwell property and accordingly would diminish the architectural merit of the proposed development when viewed from Lenore Drive. • The Blackwell site has a total site area of 1.95 hectares. Subdivision requirements stipulated in Section 6.14 – Erskine Park Employment Area of the Penrith Development Control Plan 2006 stipulates that land within the 4(e1) zone north of Lenore Drive to have a minimum site area of 20,000m^2 (2 hectares). • It is considered that the subject application would isolate the Blackwell site and would not represent sound planning principles with respect to the promotion and co-ordination of the orderly and economic use and development of land pursuant to section 5 of the *Environmental Planning and Assessment Act 1979.* • The consolidation of the Blackwell site would ensure the economic use of land in respect to providing land that would be site responsive in the long term.	
RTA COMMENTS	**ACTION**
• It is noted that the Metropolitan Strategy has designated Penrith as a Regional City and a major focal point for regional transport connections and job growth. It is important that the development of PacLib takes consideration, and contributes to the achievement of, transport objectives contained in this and other high-level NSW Government strategies. • These strategies include the NSW State Plan, Urban Transport Statement and draft North West Subregional Strategy. These policies share the aims of increasing the use of walking, cycling and public transport; appropriately co-locating new urban development with existing and improved transport services; and improving the efficiency of the road network. • By addressing both the supply of transport services and measures to manage demand for car use, the EA report should demonstrate how users of the warehouse project, will be able to make travel choices that support the achievement of relevant State Plan targets.	Refer to Section 5.2.3

• Daily and peak traffic movement likely to be generated by the proposed development including the impact on nearby intersections and the need / associated funding for upgrading or road improvement works (if required). • The key intersections to be examined/ modelled include: Lenore Drive / Templar Road Lenore Drive / Tyrone Place / John Morphett Place	Refer to Traffic and Parking Implications Report prepared by TTPA Associates.
• Details of the proposed accesses and the parking provisions associated with the proposed development including compliance with the requirements of the relevant Australian Standards (ie: turn paths, sight distance requirements aisle widths, etc).	Refer to Traffic and Parking Implications Report prepared by TTPA Associates.
• Proposed number of car parking spaces and compliance with the appropriate parking codes.	Refer to Traffic and Parking Implications Report prepared by TTPA Associates.
• Details of service vehicle movements (including vehicle type and likely arrival and departure times).	Refer to Traffic and Parking Implications Report prepared by TTPA Associates.
• The RTA requires the EA report to assess the implications of the proposed development for non-car travel modes (including public transport use, walking and cycling); the potential for implementing a location-specific sustainable travel plan (eg ' Travelsmart' or other travel behaviour change initiative); and provision of facilities to increase the non-car model share for travel to and from the site. This will entail an assessment of the accessibility of the development site by public transport.	Refer to Section 5.2.3
• The RTA will require in due course the provision of a traffic management plan for all demolition / construction activities, detailing vehicle routes, number of trucks, hours of operation, access arrangements and traffic control measures.	Refer to Traffic and Parking Implications Report prepared by TTPA Associates.

4.4 Consistency with Environmental Planning Instruments, Development Control Plans and Policies.

The implications of environmental planning policies, development control plans and policies are discussed further below:

4.4.1 State Environmental Planning Policy (Western Sydney Employment Area) 2009 (Western Sydney Employment Area SEPP)

The *Western Sydney Employment Area SEPP 2009* commenced on 21 August 2009, and zones the subject site IN1 Industrial.

Clause 34 of the *Western Sydney Employment Area SEPP 2009* contains a savings provision to the effect that it does not apply to or in respect of a development application (including a staged development application) made (but not finally determined) before the commencement of this Policy. Given that this application was lodged on 1 October 2008, prior to the gazettal of the *Western Sydney Employment Area SEPP*, the SEPP does not apply.

The proposed printing, warehouse and distribution facilities remain permissible with the SEPP as "industry", "warehouse" and "distribution centre" are permissible uses. The proposed development is not offensive or hazardous pursuant to *SEPP 3*3 and *Hazardous Industry Planning Advisory Paper No.6- Guidelines for Hazard Analysis (HIPAP No.6)* and *Multi Level Risk Assessment.*

The subject site forms a key component of the Western Sydney Employment Hub identified in the Sydney Metropolitan Strategy as a key centre for employment growth in Western Sydney to 2020. The subject site is located within Precinct 7 (Erskine Park). The Western Sydney Employment Hub is expected to create up to 36,000 jobs for the people of Western Sydney.

The aims of the Policy are:

(1) To protect and enhance the land to which this Policy applies (the Western Sydney Employment Area) for employment purposes.
(2)
(a) To promote economic development and the creation of employment in the Western Sydney Employment Area by providing for development including major warehousing, distribution, freight transport, industrial, high technology and research facilities,
(b) To provide for the co-ordinated planning and development of land in the Western Sydney Employment Area,
(c) To rezone land for employment or environmental conservation purposes,
(d) To improve certainty and regulatory efficiency by providing a consistent planning regime for future development and infrastructure provision in the Western Sydney Employment Area,
(e) To ensure that development occurs in a logical, environmentally sensitive and cost-effective manner and only after a development control plan (including specific development controls) has been prepared for the land concerned,
(f) To conserve and rehabilitate areas that have a high biodiversity or heritage or cultural value, in particular areas of remnant vegetation.

The objectives for the proposed Industrial Zone- General Industrial (IN1) in *State Environmental Planning Policy (Western Sydney Employment*) are:

(a) To facilitate a wide range of employment-generating development including industrial, manufacturing, warehousing, storage and research uses and ancillary office space.

(b) To encourage employment opportunities along motorway corridors, including the M7 and M4.
(c) To minimise any adverse effect of industry on other land uses.
(d) To facilitate road network links to the M7 and M4 Motorways.
(e) To encourage a high standard of development that does not prejudice the sustainability of other enterprises or the environment.
(f) To provide for small-scale local services such as commercial, retail and community facilities (including child care facilities) that service or support the needs of employment-generating uses in the zone.

The proposed land use for printing, warehouse and distribution facilities is consistent with the aims and objectives specified in the *Western Sydney Employment Area SEPP*. Upon completion, it is envisaged that the development will generate between 80 and 100 jobs during construction and approximately 178 jobs during operation of the facilities. The proposed Erskine Park Link Road will also create a greater road network to facilitate improved access to the M4 and M7 Motorways. The proposed development will make a major contribution towards the effective delivery of the Western Sydney Employment Area.

Part 5 of *Western Sydney Employment Area SEPP* contains principal development standards, and compliance with these standards is addressed below:

Table 7- Compliance with *Western Sydney Employment Area SEPP*

Clause 20 Ecologically Sustainable Development- Development contains measures designed to minimise: the consumption of potable water, and greenhouse gas emissions.	The Project supports ecologically sustainable development principles as encouraged by state and local government legislation and policies. Water conservation in order to conserve potable water as far as practicable: harvesting roof runoff through a rainwater collection system and used for non-potable uses such as irrigation on landscaped gardens on site, toilet flushing and truck washing have been adopted within the design of the development. Refer to section 5.2.2 for further discussion.
Clause 21 Height of Buildings Building heights will not adversely impact on the amenity of adjacent residential areas, and site topography has been taken into consideration.	The proposed building height will not adversely impact on the amenity of adjacent residential areas, which are located some 180 metres away.
Clause 22 Rainwater Harvesting- Adequate arrangements to be made to connect the roof areas of buildings to such rainwater harvesting scheme.	A 100,000 litre capacity rainwater tank to capture the roof water for reuse in toilet flushing and irrigation of planter beds and landscaped areas is proposed.
Clause 23 Development adjoining residential land- For land within 250 metres of land zoned primarily for residential purposes: Proposed buildings are compatible with the height, scale, siting and character of existing residential buildings in the vicinity, and;	 The proposal has been designed to be compatible with the height, scale, siting and character of existing residential buildings. The proposed development is setback some 180 metres away from the nearest residential properties.

goods, plant, equipment and other material resulting from the development are to be stored within a building or will be suitably screened from view from residential buildings and associated land, and; the elevation of any building facing, or significantly exposed to view from, land on which a dwelling house is situated has been designed to present an attractive appearance, and; noise generation from fixed sources or motor vehicles associated with the development will be effectively insulated or otherwise minimised, and; the development will not otherwise cause nuisance to residents, by way of hours of operation, traffic movement, parking, headlight glare, security lighting or the like, and; the development will provide adequate off-street parking, relative to the demand for parking likely to be generated, and the site of the proposed development will be suitably landscaped, particularly between any building and the street alignment.	Plant and equipment associated with the operation of the facility have been carefully positioned against the western boundary so to not be visible from either the eastern boundary (open loading areas) or residential properties to the north. Large areas of landscape zones have been proposed to the front and rear of the site, coupled with 3 metre wide landscape strip to side boundaries, effectively shielding the development from the adjacent visual receivers. Additional landscaping is proposed on land outside the subject site, on land to the north of the subject property within the Transgrid easement. The landscaping to be planted on this land will form a buffer in order to shield the view of the industrial development from the residents. An acoustic report has been prepared which will be supplemented by a detailed assessment once plant and equipment and printing machinery is fixed to ensure no loss of acoustic amenity to residents; Due to the distance of separation, matters such as headlight glare, parking, security lighting and the like should not impact on residential properties to the north; Adequate parking for vehicles associated with the development has been proposed. A total of 246 spaces will be marked; A high quality landscape plan has been prepared. A 20 metre landscape zone between Lenore Drive and the proposed development has been provided.
24 Development involving subdivision Whether the subdivision will preclude other lots of land to which this Policy applies from having reasonable access to roads and services.	Not Applicable
25 Public utility infrastructure The consent authority must not grant consent to development on land to which this Policy applies unless it is satisfied that any public utility infrastructure that is essential for the proposed development is available or that adequate arrangements have been made to make that infrastructure available when required.	There are no significant site constraints to undertaking this Major Project. The existing site services available to the site, including electricity, gas, communications, water and reticulated sewer would adequately service the project without the need for significant augmentation or upgrade.
26 Development on or in vicinity of proposed	

transport infrastructure routes This clause applies to any land to which this Policy applies that is situated on or in the vicinity of a proposed transport infrastructure route as shown on the Transport and Arterial Road Infrastructure Plan Map. The consent authority must refer to the Director-General of the Department of Planning any application for consent to carry out development on land to which this clause applies.	The application is in proximity to the Lenore Drive extension, and as such the application may be referred to the Director-General.
27 Exceptions to development standards	Not Applicable

4.4.2 State Environmental Planning Policy (Major Development) 2005 (Major Development SEPP)

The aims of this Policy are as follows:

(a) to identify development to which the development assessment and approval process under Part 3A of the Act applies,

(b) to identify any such development that is a critical infrastructure project for the purposes of Part 3A of the Act,

(c) to facilitate the development, redevelopment or protection of important urban, coastal and regional sites of economic, environmental or social significance to the State so as to facilitate the orderly use, development or conservation of those State significant sites for the benefit of the State,

(d) to facilitate service delivery outcomes for a range of public services and to provide for the development of major sites for a public purpose or redevelopment of major sites no longer appropriate or suitable for public purposes,

(e) to rationalise and clarify the provisions making the Minister the approval authority for development and sites of State significance, and to keep those provisions under review so that the approval process is devolved to councils when State planning objectives have been achieved.

(f) to identify development for which regional panels are to exercise specified consent authority functions.

In accordance with Clause 6(1) of *State Environmental Planning Policy (Major Projects)* the Minister of Planning has determined on 8 January 2008 that the proposal is a kind that is described in Schedule 1 of the *Major Development SEPP as a Part 3A Project.* Accordingly the proposal is to be assessed under Part 3A of the Act. The Environmental Assessment has been prepared in response to the Director-General's Requirements in accordance with Part 3A of the *Environmental Planning & Assessment Act, 1979.*

4.4.3 State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP)

The aim of this Policy is to facilitate the effective delivery of infrastructure across the State by:

(a) improving regulatory certainty and efficiency through a consistent planning regime for infrastructure and the provision of services, and

(b) providing greater flexibility in the location of infrastructure and service facilities, and

(c) allowing for the efficient development, redevelopment or disposal of surplus government owned land, and

(d) identifying the environmental assessment category into which different types of infrastructure and services development fall (including identifying certain development of minimal environmental impact as exempt development), and

(e) identifying matters to be considered in the assessment of development adjacent to

particular types of infrastructure development, and

(f) providing for consultation with relevant public authorities about certain development during the assessment process or prior to development commencing.

Clause 104 of the *Infrastructure SEPP* applies to traffic generating development and ensures that the Roads and Traffic Authority is given the opportunity to make representations on certain traffic generating development applications before a consent authority makes a determination on the proposal.

The provisions of Schedule 3, of *Infrastructure SEPP* state that for sites with access to a road with a floor area of more than 20,000m^2 must be referred to the Roads & Traffic Authority for comment, or for sites with access to a classified road or either to a road that connects to a classified road (if access within 90 metres of connection, measured along alignment of connecting road) with a floor area of more than 5,000m^2. In this instance a referral to the Roads & Traffic Authority in accordance with *Infrastructure SEPP* is applicable, as the floor area exceeds 20,000m$^{2.}$

4.4.4 State Environmental Planning Policy No.33- Hazardous & Offensive Development (SEPP No.33)

SEPP 33 defines developments that have the potential to be "hazardous" or "offensive". Generally a development is potentially hazardous or offensive if it is a development for the purposes of an industry, which without measures in place *"to reduce or minimize its impact in the locality or on the existing or likely future development on other land, would pose a significant risk in relation to the locality: (a) to human health, life or property, or (b), to the biophysical environment".*

A Preliminary Hazard Analysis for the proposal was prepared by Benbow Environmental (refer **Appendix 7**) in accordance with the *Hazardous Industry Planning Advisory Paper No.6- Guidelines for Hazard Analysis (HIPAP No.6)* and with *Multi Level Risk Assessment.* The purpose of the Preliminary Hazard Analysis was to assess whether the proposed volume of dangerous goods stored and the processes that occur at the site are offensive or hazardous, and would pose an unacceptable risk to the surrounding community.

The Preliminary Hazard Analysis provides for:

- an evaluation of any potential hazards imposed by the proposed operation of the site on the surrounding environment and communities and makes recommendations on the relevant prevention/protection strategies necessary to minimize the impact and risk of human fatalities, property damage and environmental pollution;
- a review of the associated risks from the surrounding industrial areas that are considered as potential sources of risk in order to identify any possible cumulative hazards and risk impacts that can occur; and
- Qualitative environmental risks and identifies safeguards that are needed.

The following activities will take place in the printing facility:

- Storage of flammable washing chemicals in the workshop area. There may be some decanting of flammable liquids as required for washing equipment. All liquid materials will be stored in a bunded area;
- Storage of LPG cylinders for forklifts outside the workshop area;
- Drying of ink with potential emissions of organic hydrocarbon vapours originating from the petroleum distillate solvent used in ink;
- Gas exhaust from the dryer will be re-circulated with air for natural gas combustion in the dryer. Exhaust gases may contain light hydrocarbons as a by-product of solvent degradation; and

- Forklift battery charging area due to the potential release of hydrogen gas during the charging process.

The study evaluates potential hazards imposed by the potential operation of the site on the surrounding environment. It also evaluates specific hazards unique to the process being undertaken in relation to dust and the need to store significant quantities of a combustible liquid Class C2.

The proposed facility would store large quantities of combustible inks and paper. The facility will also store quantities of Class 3 PG 111, Combustible C1, Class 8 II and Class 8 PG 111 Dangerous Goods.

The printing process uses ink containing a solvent based on organic oils (TOYO Heatset Offset Printing Ink) that behaves as Class C2 combustible liquids. There are 8 aboveground ink storage tanks of 15 tonnes capacity each, allowing maximum storage of 120 tonnes. The total ink usage is expected to be typically 1,750 tonnes per annum. The Material Safety Data Sheet of ink classifies it as non-hazardous. However due to the amount of the hydrocarbon content in the ink of approximately 30%, the ink is a dangerous good of Class C2, a combustible liquid with a flash point above 150 degrees Celsius.

Dangerous Goods Storage Requirements

Class 3 Flammable Liquids and Class C1/C2 Combustible Liquids

There would be up to 2.7 tonnes of Class 3 PG IIII, 1.8 tonnes of Class C1 combustible and 120 tonnes of Class C2 combustible stored on-site, the bulk being the heatset printing ink which is not classified as flammable. The ink and other consumable storage areas are located approximately 45 metres from the western side of the boundary. All the Class 3 flammable liquids and Class C1/C2 combustible liquids would be stored within a bunded area inside the ink tank farm with an area of 80m^2. The wall separating the ink tank from the press area will be built as a fire rated wall of 240 x 240 x 240.

The storage of flammable liquids would require the ink tank farm to be sufficiently ventilated. A natural ventilation system using a combination of wall vents in 2 opposite walls and a roof ridge line ventilation opening would be provided in accordance with *Australian Standards: 1940-2004 The storage and handling of flammable and combustible liquids.*

Flammable Gas

The facility will store LPG cylinders in the workshop area which are to be used as fuel for the forklifts. The LPG quantity to be stored on site is 3 tonnes at all times. The method of gas cylinder storage would be in accordance with *Australian Standards 4332-2004: The storage and handling of gases in cylinder*s. As the LPG cylinders would be stored without other gases the storage area would also need to comply with *Australian Standards 1596:2008: The storage and handling of LPG Gas.* The cylinders would be held in a secured cage over the loading dock area and outside building on the east facing side.

Corrosive Substances

Corrosive substances to be used at the proposed operations are 182 RU Positive Developer and Batteries used in two forklifts. The Positive Developer would be stored separate from the flammable and combustible liquids, separated by bunding and a 5 metre distance. The total estimated to be stored is 18.1m^3. Provision for natural ventilation and method of storage would be established in accordance with *Australian Standards 3780-2008: The storage and handling of corrosive substances.*

Two forklifts powered by batteries would be used on-site, with the capability of 5 hours of operation per charge/discharge. As the charging process begins, hydrogen gas would be released from the battery itself, thus natural ventilation would be needed to ensure proper dispersion of the hydrogen gas, in accordance with *Australian Standards 2676.1-1992: Guide to the Installation and Maintenance, Testing*

and Replacement of Secondary Batteries in Buildings and *AS 3011-1992: Electrical Installations- Secondary Batteries Installed in Buildings.*

Dangerous Goods Screening against SEPP 33 Thresholds

Dangerous Goods to be stored and used on site have been screened against thresholds outlined in the document *Applying SEPP 33 Hazardous and Offensive Development Application Guidelines*. This initial screening process determines whether the proposed development is potentially hazardous and provides guidance on the level of analysis that is required. The table below indicates dangerous goods screening against *SEPP 33 Thresholds:*

Table 8- Comparison of Screening Threshold Quantities by SEPP 33- Source Benbow Environmental

Class	Description	Quantity to be stored	Threshold Quantity	Triggers SEPP 33
Class 1.2	Explosives	None	N/A	N/A
Class 1.3	Explosives	None	N/A	N/A
Class 2.1	Flammable Gases (LPG)	7.2 kL	$16m^3$ (above ground)	No
Class 2.2	Non-Flammable Gases	None	N/A	N/A
Class 2.3	Toxic Gases	None	N/A	N/A
Class 3 PGI	Flammable Liquid	None	N/A	N/A
Class 3 PGII	Flammable Liquid	None	N/A	N/A
Class 3 PGIII	Flammable Liquid	$2.5m^3$	$1000m^3$ at 40 metres distance	No
Class 4.1	Flammable Solid	None	N/A	N/A
Class 4.2	Flammable Solid	None	N/A	N/A
Class 4.3	Dangerous when wet	None	N/A	N/A
Class 5.1	Oxidising Substances	None	N/A	N/A
Class 5.2	Organic Peroxides	None	N/A	N/A
Class 6.1	Toxic Substances	None	N/A	N/A
Class 6.2	Infectious Substances	None	N/A	N/A
Class 8 PGI	Corrosive Substances	None	N/A	N/A
Class 8 PGII	Corrosive Substances	$<0.1m^3$	$<25m^3$	No
Class 8 PGIII	Corrosive Substances	$18m^3$	$50m^2$	No
Class 9	Miscellaneous	None	N/A	N/A

The initial screening has shown that the stored amounts of Dangerous Goods on site do not exceed the *SEPP 33* thresholds. This indicates that the proposal is not classified as potentially hazardous and the amount does not exceed the threshold quantity identified in *SEPP 33*.

Equipment and areas where flammable liquids are stored will require hazardous area zones, eg inks stored in the ink tank farm. Hazardous zoning would be established upon confirmation of design factors and accurate equipment locations at the construction phase of the project.

The PHA has found that the operation of the proposed development meets the criteria in *HIPAP No.4- Risk Criteria for Land Use Safety Planning* and would not cause any risk, significant or minor, to the community with the recommended safeguards in place.

The site's proposed operations have not been found to be an offensive or hazardous industry based on applying the Department of Planning guidelines. Nevertheless, various hazardous incidents with off-site impacts were developed into hazardous scenarios for further consequence analysis.

The hazardous scenarios considered were:

1. Ink Tank Farm- Tank leak/rupture while stored, open container spill, container knocked over or pierced by forklift tyne while being handled in store.
2. Loading/Unloading Area- Leak during goods movement, rupture of hose during tanker transfer, tanker drives away with hose still connected, tanker rupture.
3. Battery Storage/Charging Area- Forklift accident, causing spillage of limited corrosive substance, leak of corrosive substance due to faulty or damaged batteries.
4. LPG Forklift Gas Cylinders- Gas cylinders valve left open when being replaced on a forklift, gas cylinder impacted by truck or vehicle.
5. Fire due to paper dust build up- Dust particles accumulate on electrical equipment and result in a fire; Build up of dust occurs due to poor housekeeping; Failure of ducting transferring trim off cuts and dust is released onto electrical equipment.

Benbow Environmental have noted that the events noted above are unlikely to happen due to the amount of materials that are stored and are in use at any one time. Specifically:

> "*Implementation of hazardous zoning would minimize the probability of having ignition source, hence reducing the likelihood of fire event. In addition there would be spill and fire protection equipment on site.*
>
> *Flash fire of natural gas is unlikely as ventilation system would allow sufficient air circulation, preventing accumulation of organic vapour in the area. All electrical equipments used would be intrinsically safe as required by hazardous zoning, therefore limiting ignition sources.*
>
> *Fire resulting from liquid spill is minimal due to the amount of flammable Class 3 PG 111 materials stored and used on site. The material would not readily evaporate and hazardous zoning would limit ignition sources, significantly reducing the chance of fire happening. Fire rated wall would be installed to isolate the ink farm together with sprinklers and fire extinguishers that would be ready accessible.*
>
> *Dangerous and hazardous materials are stored within bunded wall with spill kit nearby, thus the possibility of it escaping to the stormwater drain would be minimal".*

The risk assessment evaluation has found that the operation of the proposed development meets the criteria provided in the *SEPP 33* Screening Thresholds and would not cause any risk, significant or minor, to the community. The proposed design and operation of the facility would include environmental

safeguards to provide sufficient protection to the site such that if a pollution incident occurred there would be minimal impact to the natural environment or nuisance caused to the amenity of the adjacent occupiers of neighbouring premises. Environmental Management Procedures have been recommended and include, inter alia, spill control procedure, the use of chemical spill kits, protocols for personnel entering hazardous area zones, ventilation of work areas, reporting environmental incidents, preventative maintenance on environmental management equipment, fire management, emergency response procedure, emergency evacuation procedures, environmental housekeeping and training of a first response fire crew.

Benbow Environmental have also recommended that the assembly point in the case of emergency needs to be located in front of the site at Lenore Drive, outside the warehouse area.

The Environmental Management Procedures have been incorporated into the Statement of Commitments.

4.4.5 State Environmental Planning Policy No.55- Remediation of Land (SEPP No.55)

SEPP 55 aims to provide for a statewide planning approach to the remediation of contaminated land and in particular to promote the remediation of contaminated land for the purpose of reducing risk of harm to human health or any other aspect of the environment.

Clause 7 of *SEPP No.55* requires a consent authority to consider whether the land to which a project/development application relates is contaminated and if the land is contaminated to be satisfied that the land is suitable in its contaminated state (or will be suitable after remediation) prior to granting consent.

The aims of *State Environmental Planning Policy No. 55 Remediation of Land* state:

> *(2) This Policy aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment:*
>
> *(a) by specifying when consent is required, and when it is not required, for a remediation work, and*
>
> (b) *by specifying certain considerations that are relevant in rezoning land and in determining development applications in general and development applications for consent to carry out a remediation work in particular, and*
>
> (c) *by requiring that a remediation work meet certain standards and notification requirements.*
>
> Clause 7(1) of *State Environmental Planning Policy No.55- Remediation of Land (SEPP 55)* stipulates that*: "A consent authority must not consent to the carrying out of any development on land unless:*
>
> (a) *it has considered whether the land is contaminated, and*
> (b) *if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation") for the purpose for which the development is proposed to be carried out, and*
>
> (c) *if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land which will be remediated before the land is used for that purpose".*

In light of the above, a Phase 1 Environmental Site Assessment was prepared by Consulting Earth Scientists as part of the bulk earthworks application.

The report concluded that from a contamination perspective the site was suitable for commercial/industrial use subject to works undertaken as part of the initial site preparation for the bulk earthworks.

In this regard, the relevant measures and assessment have been undertaken in accordance with *SEPP 55.*

4.4.6 State Environmental Planning Policy No.64- Advertising & Signage (SEPP No.64)

State Environmental Planning Policy No. 64 aims to ensure that any signage associated with a development, including any advertisement, that is visible from a public place is compatible with the desired amenity and visual character of an area, is suitably located and is of a high quality design and finish.

Each of the proposed signs satisfy the definition of a "business identification sign" under the *SEPP* and are not considered to be "advertisements' for the purposes of the *SEPP*. Under *SEPP 64* a business identification sign is defined as:

"A sign (a) that indicates

(i) The name of the person, and

(ii) The business carried on by the person, at the premises or place at which the sign is displayed, and

(b) that may include the address of the premises… and a logo… that identifies the business".

Part 2 of the *SEPP* applies to "business identification signs" and Part 2, Clause 8 requires that the proposed sign is consistent with:

- The aims of the policy set out in part 1, Clause 3 and
- The assessment criteria in Schedule 1.

Part 3 of *SEPP 64* only applies to "advertisements" and not "business identification signs" as defined under the SEPP and therefore is not applicable to this application.

The proposed business identification signage includes:

- 1 x 7000mm x 2900mm to be erected on Warehouse 1 Southern Elevation
- 1 x 9000mm x 3400 mm to be erected on Warehouse 2/3 Western Elevation and Southern Elevation

An estate sign is also proposed and the location shown on the drawings. The proposed size of the sign is 3000mm x 1250mm.

An assessment of the proposed signs pursuant to *SEPP 64* is provided below.

Table 9- Assessment pursuant to SEPP No.64

Clause 3- Aims of SEPP No.64	
• Compatible with the desired amenity and visual character of an area.	The proposed signage has been designed to satisfy the performance criteria of Council's *DCP*. The Signage proposed will have no adverse impact on the amenity or character of the locality and have been designed to be compatible with the building.
• Provide effective communication in appropriate locations.	The signage is strategically located to ensure that it effectively communicates to visitors and identifies the building. The signage is simple in design and finished in appropriate materials.
• Regulate signage (but not content) under Part 4 of the Act.	Not Applicable
• Provide time limited consents for certain advertisements.	Not Applicable
• Regulate the display of advertisements in transport corridors	Not Applicable
• Ensure that public benefits may be derived from advertising.	Not Applicable
Schedule 1- Assessment Criteria	
1. Character of the Area	
(i) Is it compatible with existing or desirable character?	The proposed signage will have no impact on the existing character of the locality.
(i) Is it consistent with outdoor advertising theme in that area?	The proposal is consistent with the requirements of Council's *DCP*. There is no prevalent theme in the area.
2. Special Areas	
(ii) Does it detract from the amenity of a special area?	The proposal does not 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.
3. Views and Vistas	
(iii) Does it obscure an important view? Does it dominate the skyline or reduce	The proposed signage does not compromise or obscure any skyline views or vistas as it is located

	quality of a vista? Does it obscure other advertisements?	on the building elevation. The proposed signage does not dominate the skyline.
	4. Streetscape, Setting or Landscape	
(iv)	Is the scale and proportion appropriate? Does it contribute to visual interest? Does it screen unsightliness and rationalise signage? Does it protrude over buildings and trees?	The scale and proportion of the signage is compatible with the proposed buildings and in context of the surroundings. The proposal provides visually interesting signage without dominating the appearance of the landscape. The proposal does not impact on trees.
	5. Site and Building	
(v)	Is it compatible with the scale and proportion of the building and site? Does it respect important features? Does it show innovation or imagination in its relationship to the building?	The signage has been designed to be simple and integrate with the building. The scale and proportion of the signage is compatible with the building.
	6. Associated Devices and Logos	
(vi)	Have they been designed as integral part of sign?	The logo design of the proposed tenant is incorporated into the business name.
	7. Illumination	
(vi)	Have they been designed as an integral part of the sign? • Too glary? • Unsafe? • Effect nearby residents? • Adjustable? Curfew?	The signage will not impact on the safety of the road network or resident amenity. The proposed signage will be lit so to not cause light spillage and will not impact on adjoining neighbours. The lights shining onto business identification signage will be timer controlled, and typically will be shut off at 11pm each night.
(vii)	**Safety**	
(viii)	Would it reduce road safety? Reduce the safety of pedestrians and Cyclists? Obscure sightlines from roads?	Given the location, the sign will have no impact on road safety. It is concluded that the signs will not affect road safety in any way.

4.4.7 Sydney Regional Environmental Plan No.20- Hawkesbury-Nepean River (SREP No.20): Deemed SEPP No.20

SREP No.20 requires that the impact of future land use be considered in a regional context. The Plan covers water quality and quantity, environmentally sensitive areas, riverine scenic quality, agriculture, and the urban and rural residential development. Part 2 of the *SREP No.20* contains a list of general planning considerations, specific planning policies and recommended strategies.

These policies and strategies relate to the following matters:

- Total Catchment Management;
- Environmentally Sensitive Areas;
- Water Quality;

- Water Quantity;
- Cultural Heritage
- Flora & Fauna;
- Riverine Scenic Quality;
- Agriculture/Aquaculture & Fishing;
- Rural Residential Development;
- Urban Development;
- Recreation & Tourism;
- Metropolitan Strategy.

Part 3 of the *SREP No.20* provides controls for particular types of land use or works, identifying the need for consent, consultation and concurrence. Part 3 of the *SREP No.20* also sets out particular matters to be considered by a consent authority when assessing a development application for those uses/works.

The most relevant issues in relation to this project are water quality. A soil and water management plan prepared in accordance with managing *"Urban Stormwater- Soils and Construction (Department of Housing, 1988).* Water Quality issues are addressed in Section 5.1.4 of the Report as part of an overall stormwater management strategy.

4.5 Local Environmental Plans

4.5.1 *Penrith Local Environmental Plan 1994 (PLEP 1994)*

The site was zoned 4(e1) Employment Restricted pursuant to the *Penrith Local Environmental Plan 1994* prior to *State Environmental Planning Policy- Western Sydney Employment.*

The proposed development for printing, warehouse and distribution facilities is permissible with development consent pursuant to *PLEP 1994.*

The objectives of the 4(e1) zone include:

(a) To prohibit certain development which is likely to have an adverse environmental effect on the amenity of adjoining localities, and

(b) To promote development which does not have an adverse environmental effect on the adjoining residential and rural communities arising from air, noise or other pollution, and

(c) To permit retail activities which are:

(i) Compatible with the concept of the employment area; and

(ii) unlikely to prejudice the viability of existing business centres

(iii) or are primarily intended to service persons working in the Erskine Park Employment Area, and

(d) to permit office development of a type which would not be readily located in a traditional business zone, and would be unlikely to prejudice the viability of existing business centres, and

(e) to permit development for the purposes of recreation facilities, child care centres and community facilities in association with, or independent of, other permitted development to serve the needs of the workforce of the Area and the adjoining residential and rural communities, and

(f) to prohibit development of land for any purpose if, as a result of carrying out the development, there will be direct vehicular access between that land and either Erskine Park Road or Mamre Road, and

(g) to promote development of land with frontage to Mamre Road and Erskine Park Road if the buildings or works resulting from the carrying out of the development will, by their architectural and landscape design, enhance the rural scenic character of those roads and their roles as gateways to the City of Penrith.

The Part 3A Project is considered to be consistent with these objectives. The *PLEP 1994* contains a number of special provisions that require a consent authority to consider when assessing applications for development. These matters include impacts associated with air, water, noise or other pollution as well as visual amenity, waste management, hazardous substances, energy efficiency, transport efficiency and provision of services. All of these issues have been discussed and addressed in the Environmental Assessment.

4.5.2 Permissible Uses in *Penrith Local Environmental Plan 1994 (PLEP1994)*

A wide range of uses are permissible within Zone No. 4(e1). Prohibited development includes:

> *Amusement parks; boarding houses; camp or caravan sites; dwellings (other than those used in conjunction with other land uses that are not prohibited in this zone and situated on the land on which such other uses are conducted); general stores; generating works; industries listed in Schedule 2; junk yards; materials recycling yards; motor showrooms; offensive or hazardous industries; offensive or hazardous storage establishments; shops (other than those primarily intended to service persons working in the Erskine Park Employment Area or shops trading principally in bulky goods or motor vehicle parts and accessories); vehicle body repair workshops; waste disposal.*

Further to the above, the Schedule 2 industries of the *PLEP1994* include:

> *abattoirs, chemical factories or works, crushing, grinding or milling works, extractive industries, gasholders, liquid, chemical, oil or petroleum waste works, liquid fuel depots, metallurgical works in which more than 100 tonnes per annum of ferrous or non-ferrous metals or their ores are processed, mines, oil refineries, paper or pulp works, petroleum product storage and processing works, pre-mix bitumen works, rubber or plastic works, sawmills and scrap recovery or drum reconditioning works.*

The proposed development does not include any of the above prohibited or Schedule 2 uses. The proposed development is not offensive or hazardous pursuant to *SEPP 3*3 and *Hazardous Industry Planning Advisory Paper No.6- Guidelines for Hazard Analysis (HIPAP No.6)* and *Multi Level Risk Assessment.*

The proposed development is for printing, warehouse and distribution facilities. Whilst the proposed works are not strictly defined by any definition of *PLEP1994,* the works do not constitute development which is prohibited in the zone and are accordingly permissible in the 4(e1) zones with the consent of Council.

4.5.3 Development in Zone No. 4(e1)

Clause 19 of the *PLEP 1994* specifically applies considerations to development in the 4(e1) zone. These considerations are listed below.

(a) *wherever appropriate, proposed buildings are compatible with the height, scale, siting and character of existing residential buildings in the vicinity, and*

(b) *goods, plant, equipment and other material resulting from the development are to be stored within a building or will be suitably screened from view from residential buildings and associated land, and*

(c) *the elevation of any building facing, or significantly exposed to view from, land on which a dwelling house is situated has been designed to present an attractive appearance, and*

(d) *noise generation from fixed sources or motor vehicles associated with the development will be effectively insulated or otherwise minimised, and*

(e) the development will not otherwise cause nuisance to residents, by way of hours of operation, traffic movement, parking, headlight glare, security lighting or the like, and

(f) windows facing residential areas, or from which residential areas might be viewed, have been treated to avoid overlooking of private yard space or windows in residences, and

(g) the development will provide adequate off-street parking, relative to the demand for parking likely to be generated, and

(h) the site of the proposed development will be suitably landscaped, particularly between any building and the street alignment.

The proposed development is consistent with the aims and objectives of *PLEP1994.* The following assessment is made of the proposed development with regards to the abovementioned considerations:

(a) The proposal has been designed to be compatible with the height, scale, siting and character of existing residential buildings. The proposed development is setback some 180 metres away from the nearest residential properties;

(b) Plant and equipment associated with the operation of the facility have been carefully positioned against the western boundary so to not be visible from either the eastern boundary (open loading areas) or residential properties to the north. Further development will be constructed to the west which will further shield the plant and equipment.

(c) A visual assessment of the proposed development has been prepared. Large areas of landscape zones have been proposed to the front and rear of the site, coupled with 3 metre wide landscape strip to side boundaries, effectively shielding the development from the adjacent visual receivers. The view from the residential streets to the north is of a low key building, already screened by existing trees that does not dominate the existing industrial landscape. Further additional landscape buffer is proposed to the rear of the site, to be located on land with the Transgrid easement. Consent to carry out work within the Transgrid easement area is currently being sought.

(d) An acoustic report has been prepared which will be supplemented by a detailed assessment once plant and equipment and printing machinery is fixed to ensure no loss of acoustic amenity to residents;

(e) Due to the distance of separation, matters such as headlight glare, parking, security lighting and the like should not impact on residential properties to the north;

(f) Not applicable in this instance;

(g) Adequate parking for vehicles associated with the development has been proposed. A total of 246 spaces will be marked;

(h) A high quality landscape plan has been prepared. A 20 metre landscape zone between Lenore Drive and the proposed development has been provided.

Further, Clause 19 of *PLEP1994* requires a consent authority when assessing development within zone 4(e1) zone to consider a number of matters relating to:

- Building height, scale, siting and character;
- Screening of goods, plant and equipment;
- Building appearance when viewed from dwellings;
- Noise generation;
- Nuisance associated with hours of operation, traffic movement, parking or lighting;
- Privacy for residential areas;
- Parking provision; and
- Landscaping

Consideration of these matters has been addressed in the Environmental Assessment. Based on this assessment it is considered that the project is able to be conducted in a manner that is consistent with the special provisions of the *PLEP 1994.*

Clause 21 of the *PLEP1994* also specifies that Council may only grant consent to development on land within Zone 4(e1) for the purpose of offices only where it is satisfied that the "*land is suitable for development for that purpose would not be readily available in an existing business zone"* and "*development on that land for that purpose would be unlikely to prejudice the viability of existing business centres".* In this instance the office components to the printing, warehouse and distribution facilities are ancillary to the main operation of each building and are therefore not considered to prejudice the viability of existing business centres.

Clause 24 of the *PLEP1994* makes reference to development within the transmission easement. Subclause (2) notes that Council *"must not consent to the carrying out of development (with the exception of landscaping) on land affected by the transmission easement"* and subclause 3) requires that "*Council must require appropriate landscape treatment as part of any development of land which includes the transmission easement".*

No development is proposed for the transmission area. However it is proposed that a 6 metre batter zone (to be grassed) and a turning circle will encroach into the Integral Energy easement. Consent from Integral Energy is currently being sought.

Additional landscaping is proposed on land outside the subject site, on land to the north of the subject property within the edge of the Transgrid easement. The landscaping to be planted on this land will form a buffer in order to shield the view of the industrial development from the residents. Consent has been given from Transgrid.

4.6 Development Control Plans and Section 94 Contribution Plans

Clause 4(5) of the *PDCP2006* states that development consent must not be granted unless the Council is satisfied that the proposed development is consistent with the provisions, and the objectives, of any development control plan prepared in respect of the land to which the development application relates.

The Environmental Assessment requirements call for an assessment demonstrating that this layout and design is generally consistent with the site development and urban design requirements for the Erskine Park Employment Area DCP and for any inconsistencies to be justified.

The following sections provide an assessment of the proposal against the objects and provisions of the *Erskine Park Employment Area DCP 2006* and other *DCPs* relevant to the application.

4.6.1 Compliance with *Penrith Development Control Plan 2006 (PDCP 2006)*- Erskine Park Employment Area

The objectives of the plan are to:

(a) provide a framework that will lead to a high standard of development in the Erskine Park Employment Area encouraging local employment and creating an area which is pleasant, safe and efficient to work in;

(b) ensure that development takes account of the physical nature of the local environment, particularly Ropes Creek, ridgelines and the natural landscape;

(c) ensure that development does not result in pollution of waterways and in particular of Ropes Creek and South Creek;

(d) promote the development of a visually attractive physical environment where the form, scale, colour, shape and texture of urban elements are managed in a way which will achieve an aesthetically pleasing balance which does not adversely affect the amenity of the existing residential areas;

(e) identify and provide for public amenities and service infrastructure to accommodate development in the Erskine Park Employment Area;

(f) promote the creation of a landscaped area within the electricity transmission easement to act as a buffer between the employment zones and the residential communities;

(g) establish environmental criteria and controls for development within the area to ensure that the environmental quality of adjoining areas is not compromised;

(h) ensure that development is consistent with the objectives of the Threatened Species Conservation Act with particular regard to the endangered ecological communities, flora and fauna present on the site; and

(i) facilitate conservation of urban bushland;

(j) protect, restore and enhance riparian corridors within the Erskine Park Employment Area.

The Part 3A Project application before the Department of Planning is in keeping with each of the above objectives as follows:

(a) The development is a high quality development in the Erskine Park Employment Area and will attract approximately 180 operational jobs into the area, together with approximately 80-100 construction jobs.

(b) The proposed allotment layout takes into account the physical context of the area. Prior to the earthworks the site was naturally elevated to the north and sloped gently towards Lenore Drive to the south. The site layout has taken this into consideration, resulting in a series of cascading platforms and landscape zones resembling the natural form of the site. The smaller warehouse building is of a similar lot size to the adjoining Blackwell property and maintains a coherent streetscape presentation.

(c) The proposed stormwater drainage design layout and associated gross pollutant treatment strategies will control the pollution of waterways.

(d) The proposed infrastructure, road layout and subdivision pattern encourages future development of a visually attractive environment that will not detract from the amenity of the nearby residential areas. A visual assessment has been submitted.

(e) The development facilitates the provision of public amenities and service infrastructure.

(f) The transmission easement occupies 3 hectares of land and acts as a visual buffer, separating the industrial development from the residential properties in Erskine Park. In order to improve visual impacts, a 2 metre wide landscape buffer (to a height of approximately 4 metres) is proposed on land to the north of the subject site, in between the residents and the subject property. FDC are carrying out a similar landscape buffer treatment on adjoining property, and it is proposed to extend this buffer onto the subject site. Details of plant and tree species will be provided to the Department of Planning prior to the release of Construction Certificate.

(g) The environmental quality of the adjoining areas will not be compromised in regard to noise, air quality, dust etc. Specialist reports have been prepared which indicate the measures which will ensure the environmental quality of both the site and surrounding areas is not affected. Refer Section 5 for further discussion.

(h) Not applicable.

(i) Not applicable.

(j) Not applicable.

PDCP 2006 is set out in eight sections, each commenting on a specific facet of the design and implementation of the Erskine Park Employment Area. The following table contains a summary of the objectives of each section of *PDCP 2006*.

Table 10- Compliance with *Penrith Development Control Plan 2006- Erskine Park Employment Area (PDCP2006)*

Penrith Development Control Plan 2006	Control	Proposal	Compliance
1.0 Introduction		Noted	**NOTED**
2.0 Drainage			
2.1 Drainage Introduction	Development to comply with Council's preferred drainage/flooding/water quality system.	A Stormwater Management strategy has been prepared by S&G Consulting with respect to the proposed stormwater systems, stormwater generation, calculations of the design stormwater model, and gross pollution treatment systems. The Stormwater Management Strategy addresses the requirements of *PDCP 2006.*	**YES**
3.0 Subdivision Objectives			
3.0 Subdivision Objectives and Requirements	Applicable minimum allotment size is 10,000m^2. Minimum frontage is 60 metres.	The subject site is 13.49 hectares. The frontage exceeds 60 metres.	**YES**
4.0 Transport and Carparking			
4.1 Transport Network Objectives		Noted	**YES**
4.2 Internal Road System	The principal road and traffic management elements of these changes are identified in the EPEA Development Control Plans and development Contributions Plan and include realignement and widening of Lenore Drive, upgrading of the Erskine Park Road/Lenore Drive intersection with traffic signals, upgrading of the Erskine Park	A NETANAL road network traffic modeling was undertaken to establish the potential future traffic circumstances resultant to: • Development to the EPEA and the region to 2011; and • Development of the road system with and without the proposed link road between Lenore Drive and	**YES**

	Road/Mamre Road intersection with traffic signals, widening a section of Mamre road with provision of traffic signals at the completed western access road intersection, and provision of a new road link between the M7 and Lenore Drive with a bridge over Ropes Creek.	the M7 to 2011.	
4.3 Transport and Carparking	Access roads to be generally in accordance with Council's traffic strategy: All parking to be provided on site; Off-street parking requirements: 1:100 warehouse 1:40 office 1:300 warehouse (RTA Guidelines) Total required based on RTA Guidelines- 199 spaces	A total of 246 car spaces will be provided on site. The RTA Guidelines require 199 spaces to be provided, based on 1 per 300m^2 of gross floor area of warehouse uses and includes ancillary office uses. The Traffic and Parking Implications Assessment Report prepared by Transport and Traffic Planning Associates (**Appendix 5**) argues that the warehouse rate be adopted for the proposed printing, warehouse and distribution facilities as the employment density of the printing component is similar of that of a warehouse due to the space requirements of printing machinery and large areas required for paper and magazine storage. These adopted rates provide a realistic parking demand rather than relying on Council Development Control Rate which would result in an excessive parking provision.	**YES.** **REFER SECTION 5.**
5.0 Site Development and Urban Design			

5.1 Height	Maximum height of buildings in the 4(e1) zone is 12 metres	12.06 metres to the ridge for Warehouse 1 12.98 metres to the ridge for Warehouse 2 and 3	**NO. However the encroachment has been supported by Penrith Council and the Department of Planning.** **The proposed height is consistent with other facilities in the area.** **REFER SECTION 5.**
5.2 Site Coverage	Site coverage shall not exceed 50% Where land is included in biodiversity areas, that land can be included in site coverage calculations	The proposed site coverage is 47.8% The site is not affected by biodiversity areas.	**YES**
5.3 Setbacks	Applicable setbacks are: Mamre Road 20 metres Other Roads 15 metres Rear and Side Boundaries 5 metres Water Supply Pipeline, 5 metres	20 metres from Lenore Drive has been provided 5 metres from rear and side boundaries has been provided. No development within the building setbacks from the roads are proposed other than those items listed as acceptable by the DCP such as landscaping, driveways, drainage works, utility services etc.	**YES**
5.4 Urban design			
5.4.1 Objectives		The proposed building is of a high quality finish.	**YES**
5.4.2 Architectural/Design Requirements	Merit Issue. Urban design matters include: Quality of building design and materials Single construction materials may be limited to 50% of wall surface area External materials to have reflectivity index of less than 20%; Application of energy efficient design	External finishes to the warehouse building are proposed to be precast panels to 2700mm in height (and 2400mm to warehouse 1), articulated to provide visual relief to break up large blank walls. The building integrates contextually within the existing industrial	**YES** **Refer to Architectural Statement Section 3.7**

	principles; Articulation of walls to provided variation in streetscapes. External material colours.	precinct. Reflectivity index will not exceed 20%. Finishes and materials selected all contribute to reduce the perceived mass of the warehouse buildings. The chosen palette of colours are generally consistent with those required by the *PDCP 2006*- browns, muted greens, sand, dark red/plums and cool tones such as soft greys and grey/blues.	
5.4.3 Siting/Building Orientation	Buildings not to intrude into skyline when viewed from adjoining residential areas; Elevations orientated to residential areas to be minimized; Design and layout of buildings to consider local climatic considerations; Avoid overshadowing of adjoining areas.	The proposed siting and building orientation takes into account the physical context of the site and setting. A site analysis drawing has been prepared. In addition shadow diagrams have been prepared that indicate that there is negligible overshadowing to the rear yard of the Blackwell property (to the west) at worst case scenario in winter (9am, 21 June).	**YES**
5.5 Signage and Estate Entrance Walls	Signage to be high quality; Estate entrance walls to be provided in strategic locations in accordance with DCP.	All business identification signage will be of high quality and will comply with Council *PDCP2006* and *SEPP 64.*	**YES.**
5.6 Lighting	Lighting effects to be contained within the property.	The proposed lighting would comply with the requirements of *AS 4282-1997 Control of Obtrusive Effects of Outdoor Lighting.*	**YES**
5.7. Fencing	Security fencing on front boundary to be located generally behind the landscape setback.	All fencing will comply with *PDCP2006* requirements. The proposed fencing will complement the building and land design for site	**WILL COMPLY**

		whilst also securing the site.	
5.8 Services	Satisfactory arrangements to be made for all services	There are no significant constraints to servicing the project.	**YES**
5.9 Quarry and Surrounding Land		Not applicable	**N/A**
5.10 Transmission Line Easement	Transmission Line Easement: to create a physical buffer between the Employment Area and adjoining residential communities; to provide landscape treatment which creates an attractive outlook for adjoining residential areas and the Erskine Park Employment Area.	The transmission easement occupies 3 hectares of land and acts as a visual buffer, separating the industrial development from the residential properties in Erskine Park. In order to improve visual impacts, a landscape buffer is proposed on land to the north of the subject site, in between the residents. FDC are carrying out a similar landscape buffer treatment on adjoining property, and it is proposed to extend this buffer onto the subject site.	**YES**
6.0 Environmental Quality			
6.1-6.9 Environmental Quality	Details standards for Noise pollution, waste management, soil erosion and sediment control, air pollution, storage and handling of chemical substances, stormwater pollution control, energy conservation, contaminated land and trading/operating hours.	Consultant reports have been prepared which indicate measures to be implemented to ensure adequate environmental safeguards are in place.	**YES**
7.0 Biodiversity			
7.01Biodiversity- Flora and Fauna	Details flora and fauna assessment standards and provisions for development to be in accordance with the Biodiversity Management Strategy	Not relevant.	**N/A**
8.0 Landscaping			
8.0. Landscape Design and Areas	Details development standards for site landscaping.	Landscape Plan has been submitted	**YES**

4.6.2 Erskine Business Park Section 94 Contributions Plan

Penrith City Council's *Erskine Business Park- Development Contributions Plan* prepared under Section 94 of the EPA & Act,1979 was adopted by Council on 29 April 2008.

The purpose of the Development Contributions Plan is to:

(a) provide an administration framework under which specific public facilities strategies may be implemented and coordinated;
(b) ensure that adequate public facilities are provided for as part of any new development
(c) to authorize the Council to impose conditions under Section 94 of the Environmental Planning and Assessment Act, 1979 when granting consent on land to which this plan applies;
(d) provide a comprehensive strategy for the assessment, collection, expenditure, accounting and review of development contributions on an equitable basis;
(e) ensure that the existing community is not burdened by the provision of public amenities and public services required as a result of future development;
(f) enable the Council to be publicly and financially accountable in its assessment and administration of the development contributions plan.

Developer contributions for the area are levied on a per developable hectare basis for the following services and facilities:

- Drainage & Water Quality- Western Catchment
- Roads and Traffic Management- Catchment B
- Plan Administration- 1% of total facilities/developable area

Section 94 Contributions will be paid if required.

4.6.3 Draft Penrith Development Control Plan 2006 (Amendment No.5)

The amendment to *Penrith Development Control Plan 2006* (Amendment 5) updates the controls which apply to Erskine Business Park. The Amendment reflects the amendments to the developable area in *Erskine Business Park Development Contributions Plan 2008* and incorporates the recent changes to the Erskine Business Park Biodiversity Conservation Area. The amendments also include changes relating to the inclusion of the site in the *State Environmental Planning Policy (Western Sydney Employment Area).*

The Part 3A Project Application is consistent with the objectives of *Draft Penrith Development Control Plan 2006.*

5. Environmental Assessment- Director General Requirements: Key Issues

This Section of the report assesses and responds to the key issues specified in the Director-General Requirements.

5.1 Key Issues

Below is a summary of the key issues identified in the Director-General Requirements and responses.

5.1.1 Layout and Design- demonstrate that the proposal is generally consistent with the *Erskine Park Employment Area Development Control Plan,* and justify any inconsistencies between the proposal and the DCP;

Earlier **Table 10** in Section 4 demonstrated compliance with the *Erskine Park Development Control Plan 2006 (PDCP2006).*

The Part 3A Project Application fully complies with *PDCP2006* with the exception of the height control. Warehouse 1 incorporates a ridge height of 12.06 metres, which is a variation from the previously endorsed height of 11 metres. Warehouse 2 & 3 incorporate a ridge height of 12.98 metres, which remains unchanged from the time of the submission of the Preliminary Environmental Assessment and receipt of Director-General Requirements.

During the Preliminary Environmental Assessment period, Penrith Council and the Department of Planning supported the increase in height to Warehouse 2 and 3 based on the arguments that:

- The exceedance of the height limit referred to one warehouse building only;
- The exceedance related to the height of the roof ridge, noting that the clear height of the building was 10 metres;
- There was a considerable setback of approximately 180 metres from the nearest residential properties located to the north of the subject property and in this regard the visibility of additional height to the roof would be negligible;
- A high quality design would be achieved utilising a variety of materials reducing the impact of the scale of the building; and
- Other matters in regard to *PDCP2006* fully comply for example setbacks and site coverage controls.

It is now proposed to increase the height of Warehouse 1 by 1.06 metres, from 11 metres to 12.06 metres. The height marginally exceeds the 12 metre height limit. However the slight exceedence in height is considered acceptable given that the pad level is set lower than the central pad level (at RL 59.8, compared to RL 63.6), and the building maintains a high level of presentation to Lenore Drive.

Further, the bulk earthworks levels have dropped since the time of the Preliminary Environmental Assessment. A Section 96 application was approved by Penrith Council to lower the bulk earthworks pad levels by 900mm on 25 March 2008. In this regard, the height of the buildings will be visually read as lower structures, and are lower than previously endorsed in principle.

In addition, a landscape buffer has been proposed within the Transgrid easement, in order to separate the proposed development from the view of the residential properties.

5.1.2 Visual- including landscaping, design, set-backs, signage and lighting with particular regard to frontage onto Lenore Drive;

A visual assessment has been prepared by PacLib Group, refer to **Appendix 8.**

The main visual receivers in the vicinity of the site include:

- Lenore Drive streetscape;
- Residential area to the north of the subject site, on the other side of the overhead transmission lines;
- Employment related users located predominately to the southern side, including industrial facilities for Bluescope Steel, Coils Steel, Corporate Express and Strandbags;
- Blackwell property on the western side; and
- FDC construction site to the eastern side.

The visual impacts of the project will be mitigated through the implementation of a range of measures including:

- Building setbacks that comply with *PDCP 2006* standards, including 20 metre setback from Lenore Drive;
- Existing transmission easement buffer (3 hectares) between building and residents.
- Hardstand and loading areas that face the side and do not present to Lenore Drive or the residential properties;
- Proposed building pads and building heights are reasonable and appropriate. The two building pads, set at different heights, resembles the natural form of the site. The smaller building pad is similar in size to the neighbouring Blackwell property so that it presents as a smaller industrial scale to Lenore Drive;
- Site coverage of the proposed development is 47.8% which is within the 50% development standard of *Erskine Park Employment Area DCP*;
- Ensuring a high quality architectural design to the buildings;
- Ensuring a high quality presentation to Lenore Drive;
- Ensuring a high quality landscape design complimentary to character of area, including large areas of landscape zones to front and rear of the site and including 2 metre wide landscape strips to side boundaries shielding the development from the adjacent visual receivers; and
- The view from the residential streets to the north is of a low key building with reasonable height that does not dominate the existing industrial landscape. Most of the rear wall of the proposed building would be obscured by existing trees beyond the transmission zone easements to the residential boundary. Visual impact to the adjacent employment/industrial land users will be further mitigated through additional landscape buffers, setback approximately 3 metres from the rear of the residential properties within the transmission easement area.

The Visual Assessment concludes that: "*It is considered that the proposed development is consistent with the desired future character of the industrial area, as reflected in the planning controls that are in place and will have no significant impact on the visual qualities of the area".*

5.1.3 Traffic: including details of access to the site, details of the traffic volumes likely to be generated during construction and operation; an assessment of the predicted impacts of this traffic on the safety and efficiency of the surrounding road network and car parking requirements.

An Assessment of Traffic and Parking Implications has been prepared by Transport & Traffic Planning Associates. The purpose of the report is to:

- describe the site and proposed development scheme;
- describe the road network serving the site and prevailing traffic conditions;
- assessing the adequacy of the proposed parking provision;
- assess the potential traffic implications; and
- assess the suitability of the proposed vehicle access, internal circulation and servicing arrangements.

The Traffic and Parking Implications report concludes that "*the projected traffic generation of the proposed development will be entirely consistent with the road planning, which underlies the DCP and Section 94 contributions plan as well as the detailed assessments for intersection design for Erskine Park Road and Lenore Drive".*

- *"The traffic generation of the proposed development will be consistent with the anticipated development for the area;*
- *The traffic generation of the proposed development will not present any adverse traffic implications;*
- *The proposed parking provision will satisfy the demands of the proposed facilities;*
- *The proposed access, internal circulation and parking arrangements will be appropriate to current design standards".*

Each of the components to the traffic and parking analysis will be discussed separately below.

Access to the site and circulation

Access to the site is from Lenore Drive located on the southern side of the boundary. It is proposed to construct a new vehicular access driveway to serve Warehouse 2 and Warehouse 3. The existing driveway on the western boundary will be upgraded to serve Warehouse 1.

The size and number of loading docks have been designed in response to client requirements. The likely number of daily truck movements for warehouse facilities of this size will be adequately handled by the facility, refer to **Tables 3** to **5** for further information.

All products arriving at the site will typically arrive in a variety of truck sizes from rigid trucks to B-Double trucks. The driveways have been designed in accordance with the requirements of *Australian Standards 2890 Part 2* and are appropriate in relation to the frontage road type, being a local road and for access using 25 metre B Double vehicles. The driveways will be located on a straight section of Lenore Drive where suitable sight distances will be available.

A vehicle turning area will also be constructed in the north-western part of the site to enable trucks accessing Warehouse 2 for waste compactor collection and ink drop off to turn around once a day, omitting the need to travel around the perimeter of Warehouse 3. Refer to submitted Traffic Flow Plan which indicates the flow of vehicles on site.

Internal circulation has been designed as far as practicable to separate car and truck movements, in order to minimize the potential for conflict. All facilities provide for trucks to enter and leave the site in a forward direction with generous internal hardstand to enable efficient truck access and circulation. Truck turning diagrams (swept paths) form the Appendix to the Traffic and Parking Implications Report.

Parking

A total of 246 car spaces will be provided on site.

The proposed parking provisions for each of the warehouses are:

- Warehouse 1- 24 spaces
- Warehouse 2- 177 spaces
- Warehouse 3- 45 spaces

Each of the warehouse units provides sufficient car parking provision pursuant to the RTA Guidelines.

The original application showed 23 additional spaces for Warehouse 2 which have since been removed to avoid any conflict between the mix of heavy vehicles and cars in loading area.

The RTA Guidelines require 199 spaces to be provided, based on 1 per 300m^2 of gross floor area of warehouse uses and includes ancillary office uses (as the floor area of ancillary office space is less than 20%).

The Traffic and Parking Implications Assessment Report prepared by Transport and Traffic Planning Associates (**Appendix 5**) argues that the warehouse rate be adopted for the proposed printing, warehouse and distribution facilities as the employment density of the printing component is similar of that of a warehouse due to the space requirements of printing machinery and large areas required for paper and magazine storage. These adopted rates provide a realistic parking demand rather than relying on Council Development Control Rate which would result in an excessive parking provision.

The Department of Planning and Penrith Council have agreed to support a requirement which is between the RTA and Council rates.

Traffic Generation and Traffic Impacts on Network

The traffic generation of the proposed development would be intrinsic to the staffing and operational circumstances rather than generic RTA land use rates. The bulk of the generated traffic movements will comprise the arrival and departure movements of employees and the delivery, dispatch and service truck movements.

The delivery, dispatch and servicing movements will involve a range of vehicle types including B Doubles, semi-trailer and large/medium large rigid vehicles. The peak traffic activity will occur between 2pm and 3pm when the Warehouse 2 shift change occurs within the printing facility.

The projected peak vehicle movements generated by the proposed development will be relatively minor albeit they will comprise potential truck movements of some 6 to 7 vehicles. Lenore Drive will be constructed with a 4 lane carriageway (with a future provision for 6 lanes) and the projected traffic movements along Lenore Drive will not present any unsatisfactory vehicle access circumstances for traffic generated by the site development.

Servicing

There will only be relatively minor level of servicing required for the development. Refuse removal will be undertaken using the expansive truck and carparking areas which adequately provides for the standing service vehicles.

The printing facility will involve the delivery of ink and the collection of paper to be recycled from the western side of the building which is isolated from the main delivery area.

It is proposed to provide a turning area at the north-west corner of the building to accommodate a 180 degree turn of a 19 metre semi trailer. The turning bay encroaches into the Integral Energy easement and consent is currently being sought.

Construction

Exact volumes of construction traffic has not been determined yet, however it is envisaged that typical daily flows during construction would be less than operational traffic generation.

It is anticipated that a range of vehicles (utes to semi trailers) will deliver to the site, in the order of 12 deliveries per day. The number of deliveries would increase to 25 deliveries a day during concrete pours. As approximately 80-100 construction workers will be on site, it is envisaged that in the order of 50-60 cars would be on site at the worst case scenario.

Further details in relation to construction management traffic will be discussed in the Construction Environment Management Plan, to be submitted prior to the release of the Construction Certificate.

5.1.4 Soils and Water- including the proposed erosion and sediment controls (during construction), the proposed stormwater management system, water supply, including consideration of the potential for rainwater harvesting, and wastewater disposal.

Soils

An Erosion and Sediment Control Plan as part of the Stormwater Management Plan and Strategy (**Appendix 9**), in accordance with the guidelines of the NSW Department of Housing "Blue Book" prepared by S& G Consulting Engineers has been submitted with the application.

The Erosion and Sediment Control Plan provides for the:

- Protection of disturbed ground through devices such as temporary vegetation, diversion banks and sediment fences;
- Early installation and progressive implementation of erosion controls;
- Early construction of permanent drainage structures, culverts, sediment basin traps and catch drains;
- Progressive revegetation of disturbed areas;
- Use of geotextile to stablise disturbed surfaces during construction of culverts;
- Control of runoff from embankments through shaping of fill and construction of temporary windrows and batter drains;
- Implementation of erosion control measures at associated sites, including access tracks, roads, office/compound site and extraction sites;
- Progressive and continual implementation of temporary sediment controls;
- Diversion of runoff from disturbed areas to sediment control structures;
- Management of turbid water in basins after rain through flocculation or extraction and use for construction or dust suppression;
- Construction of temporary sediment traps at strategic locations;
- Routine maintenance of sediment control devices to ensure that they remain fully functional at all times;
- Removal of sediment from basins and other structures and placement in secure locations where further movement will not occur;
- Minimisation of transportation of mud and soil by vehicles onto Erskine Drive, through the use of shakers and washbays;
- Provision for regular inspections of the control measures by a trained personnel to review and update control measures. Inspections should be constructed weekly and immediately after every significant storm event;
- Dust control through progressive revegetation and application of water;
- A procedure to ensure that water is not released from basins until achieving the appropriate quality standard; and
- Meeting EPA requirements and the guidelines of the "Blue Book".

Water Management

Part C of *PDCP 2006* outlines the requirements for water management. The following are the relevant controls:

- Recycle water for non-drinking uses. A minimum water reuse tank of 100,000 litres is recommended;
- Water quality modelling required for medium size lots;
- Adoption of pollution retention criteria;
- Adequate stormwater detention to ensure for all rainfall events up to and including the 1 in 100 year average recurrence interval (ARI) event, new developments do not increase stormwater peak flows in any downstream areas; and

- Erosion and sediment control plan must be submitted.

Stormwater Management

The Stormwater Management Strategy for the development provides for an on-site detention system capable of reducing the discharge from the site to pre-development conditions. The on-site detention has been sized using a runoff routing model in DRAINS software. The strategy consists of seven individual on site detention tanks detailing different catchment areas on site.

The water quality discharge from the site has been simulated using the MUSIC model to determine if the proposed train treatment approach adopted is efficient in reducing the pollutant concentration below target values set by Penrith City Council.

The Stormwater Management Plan and accompanying Stormwater Management Strategy Report proposes a train treatment approach to reduce the transfer of pollutants from the site. The following measures have been proposed:

- Roof runoff to be separated from the surface runoff;
- A rainwater reuse tank, 100,000 litres capacity has been installed to capture the roof water for reuse in toilet flushing and irrigation of planter beds and landscaped areas;
- Gross pollutant traps to be provided to treat litter and other coarse sediments from the surface runoff prior to discharging into the bio-retention swale; and
- A bio-retention swale to treat fine particles is to be provided in the landscaped setback fronting Lenore Drive.

Two gross pollutant traps have been nominated to capture litter and coarse sediments prior to discharging into the bio-retention pond/swale. Bioswales are essentially a surface and sub-surface water filtration system. They provide a number of functions including:

- Removing sediments and attached pollutants by filtering through surface vegetation and ground cover and through an underlying filter media; and
- Delaying run-off peaks by providing retention capacity and reducing flow velocities.

Bio-swale systems also have aesthetic benefits due to the surface vegetation and can be incorporated in landscape features. The swale consists of a 10 metre wide base with banks battering to surface levels at the boundary and at the development site. The base is underlain with 1 metre deep filter media and subsoil drainage lines over an impervious liner covering the entire area of the swale. The bio-retention system has an extended pond depth of 1 metre above the surface and is an on-line system capable of catering for the design flows.

Rainwater Harvesting

A 100,000 litre capacity rainwater tank to capture the roof water for reuse in toilet flushing and irrigation of planter beds and landscaped areas is proposed.

Water

There is an existing Sydney Water Corporation 300mm pipe in Lenore Drive which is available for connection and is adequate to service the development.

Water conservation measures will be applied in the form of reticulated rainwater harvested for grey water use. Clean discharge from internal waste water equipment (from the printing facility) will be directed to the rainwater harvesting tank for reuse.

Sewer

The extension to Sydney Water's sewer has been designed and is in the process of being constructed (Sydney Water Case Number 114466WW). A cost-share agreement has been put into place with the owners of the property to the east.

Wastewater Disposal

There will be wastewater which is produced during the printing process. Reverse osmosis treated water is produced on site from town water supplies (possibly from stormwater retention stocks). The anticipated amount of treated water required will be 3,125 litres per hour of which it is anticipated that 625 litres per hour will go into waste. This water will be used as grey water and also assist in watering the grounds.

5.1.5 Noise- including construction, operational and traffic noise;

An Operational Noise Assessment (**Appendix 10**) has been prepared by Atkins Acoustics, in accordance with the *Department of Environment and Climate Change requirements (DECC), Industrial Noise Policy (INP)* and *Noise Guide for Local Government (NGLG).*

Noise modelling considered 24 hour operation with operating scenarios representing day/evening and night activities. The noise modelling represented a range of activities, situations, and noise levels likely to be emitted from the site and with all plant and equipment operating simultaneously. The noise modeling conducted for typical plant and equipment was established from data from similar facilities in respect of fixed mechanical and printing/finishing activities.

The fixed plant and equipment required for the proposed printing, warehouse and distribution facility include:

- Air conditioning systems and ventilation for the offices and staff facilities;
- Fans for the waste collection area;
- Roof-top extraction fans and;
- Printing, finishing and sorting machinery for Warehouse 2.

The Operational Noise Assessment has based findings on the following truck movements:

- Day/Evening- 23 x Semis & Rigid Trucks
- Night- 2x Semis and/or Containers

With respect to activities on Sundays, reduced truck numbers are projected as follows:

- Day/Evening- 3 x semis
- Night- 2x semis and/or containers

The mobile plant would include gas and electric powered fork trucks and electric pallet transporters. Transfer of stock and loading/unloading would use gas and electric powered for trucks and pallet trolleys. Gas powered forklifts were considered in order to represent conservative assessments although it is likely that electric forklifts will be used.

Source noise levels comprise of audit measurements of typical truck movements and the use of gas forklifts at similar printing facilities. Operational noise from the proposal was predicted using the ENM environmental noise computer model.

For assessment of intrusive noise, the INP recommends that the LAEQ, 15min source noise should not exceed the existing LA90 Rating Background Level by more than 5dbA. The assessment goal for preservation of amenity requires noise levels to be within the acceptable levels for the locality and the land use.

The Report notes that the nearest potentially affected residential areas are located approximately 180 metres to 320 metres to the north-west, north and north-east of the subject site. Site measurements and inspections confirmed that the noise environment at potentially sensitive residential noise receivers is influenced by distant and local traffic, domestic activities such as dogs barking and existing industrial premises to the south-west of the subject site.

As the proposed development will operate 24 hours per day, intermittent night time activities were also addressed. Typically there will be trailer drop off and pick up during night time hours with limited outdoor use of fork trucks for Warehouse 1 and container/trailer drop off only for Warehouse 2/3. To avoid disturbance during night-time hours, the NGLG recommends that the LA1, 1 min noise levels when

assessed outside a bedroom window should not exceed the background LA90 noise levels by more than 15dB(A).

All modelling scenarios are worst case operating scenarios. The modelling assumed all plant and equipment operating simultaneously and typical operations that are consistent for day/evening and night operations. Loading/unloading activities for all warehouses were modelled simultaneously with truck movements and operation of the printing and finishing processes for day/evening hours. During night hours, loading/unloading activities were considered for Warehouse 1 (East) only as it is not proposed to externally load/unload during night hours for Warehouses 2 and 3. Trucks for Warehouse 2 during night time hours would be restricted to the specified drop off zone shown on the site plan.

The noise modelling considered the noise levels and source locations along the eastern sides of the proposed warehouses to represent the potential most exposed locations for residential areas to the north. Preliminary modeling identified potential noise exceedance to the north and north east in the absence of additional noise controls. Accordingly the construction of a 3 metre high acoustic wall on the northern side of the night drop off zone for Warehouse 2 is recommended.

The results of the noise modeling have shown that predicted levels from the proposed facility generally satisfy the recommended assessment goals with effective implementation of a range of operational management and noise amelioration measures.

Fixed mechanical plant including AC condensers and exhaust fans were not selected at the time of the assessment and were excluded from the noise model. In addition all details of all plant and equipment including printing and finishing processes would be reviewed and assessed by an acoustic consultant during the detailed design phase prior to final specification to ensure that project consent noise goals are satisfied, as follows:

- Site layout generally in accordance with Figure 2 Drawing No. 080225-DA-002 prepared by PacLib Industrial.
- The Plant sound power levels or equivalent nominated in Table 6 of the Operational Noise Assessment Report are satisfied;
- Air-conditioning systems and exhaust fans selected on acoustic performance and subject to detailed acoustic review and assessment prior to final specification to ensure that noise goals are satisfied;
- Details of mechanical plant, equipment, processes and activities shall be subject to detailed review by an Acoustic Consultant prior to final specification;
- Space averaged internal noise levels controlled to LAeq, 15min 60dB(A) or less with in warehousing and distribution areas (Warehouse 1 & 3);

The following are acoustic treatments recommended to be incorporated within the building.

Building Construction - General

- Building wall cladding (Warehouse 1 and 3) precast concrete tilt-up panels (Rw40-45) up to 2400mm above FFL and steel wall cladding (0.6mm BMT) above 2400mm above FFL and steel wall cladding (0.6mm BMT) above 2400mm FFL (noting upgraded acoustic performance required for Warehouse 2- Print/Finish Areas);

- Building roof cladding (Warehouse 1 and 3) consisting of sheet metal (min 0.6BMT) over fiberglass building blanket and medium duty thermofoil or similar and provide a minimum installed Rw22 or greater (noting upgraded performance required for Warehouse 2 – Print/Finish Areas);

- Any translucent panels proposed within warehouse building facades or roofs shall be specified taking into account required acoustic performance in order to control breakout noise from internal

activities. Particular attention would be given to the printing and finishing areas. Any proposed translucent panel areas shall be subject to detailed review by Acoustic Consultant prior to final specification;

- Any penetrations of roof or walls shall be acoustically detailed to control breakout noise. Al penetration details would be subject to acoustic review prior to final specification;

- Specification for fast acting roller doors for warehouse buildings and controlled to remain closed except for short duration opening to allow truck and/or fork truck access. Proposed fast acting roller doors are to be selected on acoustic performance and a minimum installed noise reduction of 20dBa (A);

- Construction of an acoustic wall (Boral Ezyshield, Fleetwood, Sentinel, masonry or equivalent) to a height not less than three (3) metres above FFL (RL 66.9) extending from the eastern building facade of approximately 30m east and adjacent to the northern side of the night drop off zone. The acoustic wall would be subject to review by a qualified Acoustic Consultant following EA approval and during the design development phase of the compliance with Consent Conditions; and

- Where practical fixed and mobile plant be fitted with low level or broadband 'quacker' reversing alarms.

The following are options for acoustic treatment within Warehouse Building 2 (printing facility):

Building Construction – Warehouse 2
(Printing)

- Roof construction acoustically upgraded to provide a minimum installed noise reduction in the order of 37dBa(A) or Rw43;

- Wall (west) construction acoustically upgraded to provide a minimum installed noise reduction in the order of 29dB(A) or Rw35 *(eastern side of printing area separated from external facade by workshop and computer room);*

OR

- Provide acoustic enclosure / 'room' to contain printing machines in order to reduce space averaged internal noise levels at the internal surface of the building walls to LAeq 75dB(A) and roof to LAeq 67dB(A) or less;

OR

- Selection of printing machines to reduce space averaged internal noise levels at the internal surface of the building walls to LAeq 75dB(A) and roof to LAeq 67dB(A) or less;

OR

(Finishing)

- Roof construction acoustically upgraded to provide a minimum installed noise reduction in order of 27dB(A) or Rw33;

OR

- Provide acoustic enclosure / 'room' to contain finishing machines in order to reduce space averaged internal noise levels at the internal surface of the roof to LAeq 65 dB(A) or less;

OR

- Selection of finishing machines to reduce space averaged internal noise levels at the internal surface of the building roof to LAeq 65dB(A) or less;

The Operational Noise Assessment Report also recommends that a "Site Operational Noise Management Plan" be developed for the site which includes:

- Induction and certification for truck drivers to operate trucks on the site at less than 20kph;
- Induction and certification for truck drivers to operate trucks without exhaust brakes whilst on site;
- Procedures for residents to contact site management in regard to complaints or additional information;
- Follow-up procedures to inform residents of actions implemented following any noise complaints;
- Regular inspections of all site plant including trucks to ensure that the installed noise suppression units are functioning and require no maintenance; and
- Regular audits at sensitive receiver locations to identify additional procedures to minimize noise emissions from the site.

Further the Operational Noise Assessment Report recommends that within three months of commissioning of the facility, site inspections and noise measurements be conducted by a qualified Acoustic consultant to demonstrate that the operation of the facility satisfies the project noise goals.

These recommendations are adopted in the Statement of Commitments.

5.1.6 Waste

A Waste Management Plan **(Appendix 11)** has been submitted with the application. The objectives of the Waste Management Plan are to avoid creating waste in the first instance, to reuse waste, and recycle material off site. The Waste Management Plan nominates the storage and collection of wastes and recyclables and ensures adequate and appropriate storage areas on site.

In addition, specific to the printing facility component, paper scraps will be compacted using a pelletiser and then collected daily. The waste paper conversion area needs to be readily cleaned to ensure there is a low risk of fire or a dust explosion, which is a rare event given the nature of dust being paper particles and cut offs. The area is needed to be kept to a high standard of cleanliness to remove paper dust and to maximize the operating efficiencies of the printing equipment. Reverse osmosis treated water is produced on site from town water supplies and if possible from stormwater retention stocks. The anticipated amount of treated water required for the printing process (process cooling) will be 3,125 litres per hour if all machines are running. It is anticipated that 625 litres per hour will be bled off and become waste water post being used within the printing process. This water will be used as grey water and also used to irrigate the gardens.

5.2 Additional Issues

5.2.1 Air Quality

Air Quality during printing operation

An Air Impact Assessment Report prepared by Benbow Environmental **(Appendix 12)** has been submitted and provides:

- A description of the air emission sources on site in relation to the printing facility;
- Discussion of the relevant legislation documents and guidelines;
- Assessment of impacts from the identified air emission sources; and
- A recommendation of controls and procedures where necessary.

The assessment has adopted criteria from the *Protection of the Environment Act 1997*, *Protection of the Environment Operation (Clean Air) 2002*, *Good Practice Guide for Assessing Discharges to Air from Industry 2008* and the *Approved Methods for Modelling and Assessment of Air Pollutants in New South Wales, 2005.* These criteria are an essential limit to use in assessing against air pollutants for the proposed printing facilities.

The air quality report concludes that "*after performing simulation of normal and extended operating load, it is found that the proposed printing, distribution and warehouse facility contributed a very low to negligible concentration of pollutants to the environment. With this fact, the legislation limits are easily complied".*

The list of site operations in the table below was examined for potential sources of air emissions. The Table below shows the summary of this analysis:

Table 10: Potential Sources of Air Emissions, Source Benbow Environmental May 2009

Activity/Equipment	Potential for Air Emissions
Receipt and Dispatch of Raw Materials and Products	Negligible
Office and Administration	Negligible
Web Offset Printing Process: • Paper web feed • Ink fountain • Dampening system • Plate and blanket cylinders • Dryer • Chilled Rollers • Trimmers	 Potential dust emissions Potential VOC emissions Potential VOC emissions Potential VOC emissions Potential combustion and VOC emissions Negligible emissions Potential dust emissions
Ancillary Processes: • Heat exchangers; and • Collection and compacting of paper scraps using Pelletiser	Negligible emissions Potential dust emissions

Operations and activities found to contribute towards air emissions are further discussed below:
Web-offset printing process

1. Paper Web Feed- The paper web feed is the section of the printer where paper rolls called "webs" are placed into the feeding point of the printer. Trimming may occasionally be needed in order to achieve the correct width of the web. Benbow have concluded that the dust emissions from this activity can be considered minimal in terms of environmental impacts, given technology used and size of paper handling.

2. Dampening System- No emissions would be expected based on the components of the dampening solution, and hence the emissions from the dampening system are considered negligible.
3. Plate and Blanket Cylinders- No emissions would be expected to be emitted from this area given the nature of the components and the extremely low concentrations of the potential source of emissions.
4. Dryer- Emission factors for each VOC have been detailed in the Air Quality Report.

Ancillary Processes

1. The production of pellets from paper off cuts may potentially release dust, however it is considered that this dust is negligible. Compaction of paper off-cuts may not produce dust equivalent to what is produced during the trimming processes and therefore Benbow Environmental have concluded that dust emissions from the palletiser would be negligible.

Benbow Environmental also provided a comparison to the *Protection of Environment Operations (Clean Air)* regulation limits. No non-compliances were found based on the results of the calculations established. It was simulated that all air pollutants would run 24 hours, 7 days per week. The dryer stack and the fugitive emissions from the printing and washing processes were found to be the major air emission sources from the subject site and hence were assigned to release emissions constantly throughout all hours of the modelling year. The simulation results are well within the legislation limits. The proposed printing industry itself contributes very low if not negligible concentration of air pollutants.

Benbow has recommended that the following safeguards be placed to maintain good air quality during operation:

- Ensure regular maintenance of dryer burners;
- Good environmental housekeeping within the facility with special emphasis on the following:
    - Removal of any build up dust from trim cutters;
    - Routine use of floor sweeps to remove trim not captured by the trim collection system;
    - Routine removal of dust from horizontal surfaces;
    - Routine removal of dust within the pelletiser area to prevent its accumulation on horizontal surfaces.

- Properly maintain ventilation of the printing press area ensuring natural ventilation louvres are not blocked;
- Maintain trafficked areas free of dust;
- Maintenance of roadway surfaces;
- Stack heights of dryers 5 metres above the apex of the building and with stack discharge velocities of 15m/sec achieved by trim cutting the end of the stacks.

The above safeguards have been reflected in the Statement of Commitments.

Air Quality During Warehouse Operation

The air quality impacts during the operation stage of the warehouse and distribution facility are expected to result from on-site vehicle movements. Service vehicles such as forklifts and pallet movers will be powered by electricity and natural gas and therefore would not generate significant emissions.

Air Quality During Construction

The air quality during the construction phase is expected to be affected by dust and particulate generation, particularly from bulk earthworks, wind erosion from stockpiles, truck movement on unpaved

surfaces- these activities can be controlled through the adoption of technical practices including good site management, vehicle maintenance, and the application of dust mitigation measures.

The statement of commitments reflects a commitment to maintaining air quality through construction and during operation of the printing, warehouse and distribution facilities. Dust and other particulate matter will be managed in accordance with the usual industry practice and the proposed Construction Environmental Management Plan.

5.2.2 Greenhouse Gases

A Greenhouse Gas Report has been prepared by Benbow Environmental. The purpose of the report was to compare certain aspects attributable to the activities of the existing and proposed facilities in terms of greenhouse gas emissions.

The Greenhouse Gas Report considered the following standards and guidelines when undertaking GHG emission calculations:

- AS ISO 14064.1-2006 Greenhouse Gases- Part 1 Speculation with guidance at the organization level for quantification and reporting of greenhouse gas emissions and removals;
- National Greenhouse Gas Accounts Factors;
- National Greenhouse and Energy Reporting (Measurement) Technical Guidelines 2008 v1.1 and
- The Greenhouse Gas Protocol

The Greenhouse Gas Report determined the variance in Greenhouse Gas emissions between the existing used facilities and the proposed printing facility in relation to transportation requirements for raw materials, finished goods and waste, loading and unloading practices, fuel consumption and electricity consumption. The Greenhouse Gas report also estimated the variation in greenhouse gas emissions that would result from Scope 1 and Scope 2 greenhouse emissions. Scope 1 emissions are direct Greenhouse Gas emissions and include natural gas fuel use for the dryers, transportation requirements associated with the transportation of raw materials and finished goods by road, and emissions from the use of LPG forklifts for unloading practices. Scope 2 emissions are in-direct GHG emissions, accounting from the generation of purchased electricity consumed by the tenant.

As the proposed tenant use existing printing facilities in Moorebank in New South Wales and Clayton in Victoria, the new printing facility would replace the use of these third party facilities. There would also be storage space available to store finished product within the new printing facility at Erskine Park and this would eliminate the need to transport printed material from the existing printing facilities to a separate warehouse.

The production tonnages for the existing facility is 65,000 tonnes per annum, and it is proposed that this amount would remain the same.

The new processes have been designed to generate less than 8% waste, which is much less than using the existing facilities used which currently generate 15% waste. Natural gas consumption for the new dryers that would operate at the facility was estimated using equipment specifications. Five presses are proposed for the new facility each with a dryer. The new equipment would reduce energy consumption by approximately 1% to 3%.

The approach taken to estimate GHG emissions from the existing and proposed facilities involved a number of conservative assumptions. Calculations were based on one way trips and the annual quantity of paper rolls for the facility being 65,000 tonnes. Quantities of paper rolls for two existing facilities were assumed to be divided equally between them and therefore equalled 32,500 tonnes per annum. The quantity of ink was calculated based on the assumption that the ink coverage on the paper is 30%. The

total kilometers travelled and number of trips required per annum for transport of this material was then determined.

The results of the greenhouse gas calculations indicate that operation of the proposed facility would generate 15,023.9 tonnes of carbon dioxide equivalent less than the use of current printing operations. The majority of this saving would be achieved through the installation of more modern and energy efficient equipment that would significantly reduce the electricity consumption.

The Greenhouse Gas Report provides a summary of the estimates determined for GHG emissions from road transportation for the existing and proposed scenarios. At the present facility, the storage of unfinished product would be on site and transportation to a storage warehouse would not be required. This results in less loading and unloading activities.

In regard to Scope 2 emissions, electricity power supply would be brought in at high voltage and there would be 6 substation transformers owned by a utility company however it is unlikely that the facility will require this power to operate at full capacity.

A Greenhouse Gas Action Plan is recommended to be implemented at the facility. Adoption of this Plan is reflected in the Statement of Commitments. Specifically:

- Base Year GHG Inventory;
- Verification of the Base Year GHG Inventory by an independent third party;
- Annual reporting of GHG emissions in accordance with NGER Legislation;
- Identification of activities to reduce GHG emissions or increase GHG removals; and
- Implementation of identified opportunities to enable reduction in GHG emissions and/or increase in GHG removals.

5.2.3 Sustainable Forms of Transport

To encourage workers to utilize alternate modes to private vehicles for journeys to/from work, it will be recommended to tenants to implement a travel demand strategy which includes the following strategies:

- Displaying bus and rail timetables in staff meal/recreation areas
- Providing public transport information packages to all employees and new staff as part of their induction;
- Providing secure parking for bicycles, together with shower/change room facilities and
- Encouraging staff members to carpool.

Suitable space within the printing, distribution and warehouse facilities will be available for bicycle parking. Other reasonable ways to minimize car demand are specific to the site.

Public transport services in the vicinity of the site are provided by BusWays routes 772, 774 and 835. The 835 service operates 5 days a week and runs along Mamre Road and Erskine park Road past the site, linking to Penrith Railway Station. Routes 772 and 774 provide connections to Mount Druitt Railway Station.

Development of the site with good access to arterial roads and motorway system and to improve the surrounding road network will make the site more attractive to potential future public transport connections.

5.2.4 Construction Environment Management Plan

A construction environmental management plan will be developed prior to commencement of construction.
The following issues will be addressed in the Construction Environment Management Plan:

- Provision of required amenities for construction works and temporary fences to construction areas;
- Provision of site signage for construction workers to limit access to certain areas;
- Site orientation and instructions for subcontractors in relation to overseeing construction traffic, and services;
- Protocols for construction traffic on surrounding roads to reduce noise and manage driver behaviour;
- Erosion and sediment control measures;
- Management of construction waste; and
- Occupation health and safety matters

5.2.5 Environmental Monitoring

Below are summaries of action plans for each environmental aspect that may be impacted upon during construction and operation. The action plans set out the environmental monitoring and management tasks that need to be undertaken. Greater detail in regard to construction will be provided in the Construction Environment Management Plan. Monitoring programs associated with the operation of the facilities are listed in the Statement of Commitments.

Table 11: Environmental Monitoring Action Plans

Waste Action Plan		
Requirement	**Responsibility**	**Timing**
Pre-Construction		
Minimise site disturbance, limiting unnecessary excavation.	Building Contractor	Pre-Construction
Incorporate into contracts requirements for procurements of materials to have high recycled or recyclable content.	Building Contractor	Pre-Construction
As much as possible ensure that subcontractors methods include practices which minimize the generation of waste, maximize recycling opportunities and re-use water materials.	Building Contractor	Pre-Construction
Ensure that facilities for the collection, transfer and disposal of all identified waste streams are in place.	Building Contractor	Pre-Construction
During Construction		
Construction waste to be disposed off site to be classified in accordance with Environmental Guidelines Assessment, Classification and Management of Liquid and Non-Liquid Wastes and to be disposed of to a facility that may lawfully accept the waste.	Building Contractor	During Construction
Provide separate recyclables for the receipt of all recyclables waste steams identified from construction to ensure materials are reuse and/or recycled where possible.	Building Contractor	During Construction

Waste containers/skips must not be located on a public road or road related area eg footpath.	Building Contractor	During Construction
Ensure bins are serviced regularly to ensure the area remains tidy.	Building Contractor	During Construction
Dispose of any waste that cannot be reused or recycled at a landfill licensed by the EPA to accept that type of waste.	Building Contractor	As required
Construction employees and subcontractors will be encouraged to minimise domestic waste production and reuse/recycle where possible.	Building Contractor	As required
Ensure that the site is maintained in a clean and tidy condition.	Building Contractor	During Construction
Post Construction		
Clean and remove rubbish from the site working areas.	Building Contractor	During Construction
During Operation		
Provide separate recyclables for the receipt of all recyclables waste steams identified from construction to ensure materials are reuse and/or recycled where possible	Tenant	During Operation
Monitoring Requirements		
Waste dockets to be provided and kept on site for collection of waste.	Building Contractor and Tenant	During Construction and During Operation
Visual inspection of bins and other waste disposal areas.	Building Contractor and Tenant	During Construction and During Operation
Traffic and Access Action Plan		
Requirement	**Responsibility**	**Timing**
During Construction		
Parking for all construction staff and personnel is to be contained on site within designated areas.	Building Contractor	During Construction
All construction traffic is to enter/exit the construction site via the site main access way.	Building Contractor	During Construction
Identify and use a primary transportation route for construction trucks.	Building Contractor	During Construction
Ensure that trucks are correctly sized and fully loaded so that the volume of each delivery is maximizes and the number of trips is therefore minimized.	Building Contractor	During Construction
Use communication systems to manage the flow of truck movements on site.	Building Contractor	During Construction
Post Construction		
All roads damaged by construction activities to be rehabilitated.	Building Contractor	On Completion
Monitoring Requirements		
If significant complaints are received monitor traffic noise and ensure compliance with *EPA's Environmental Noise Criteria for Road Traffic Noise 1999.*	Building Contractor	To be established

Visual inspections to be undertaken of the condition of accesses to the site, parking areas, access roads, and compliance with vehicle speeds at construction site.	Building Contractor	During construction
Hazards and Risk Action Plan		
Requirement	**Responsibility**	**Timing**
Pre-Construction		
Prepare a construction safety management plan that will identify the potential risks presented to non-construction workers and present strategies to minimize these risks.	Building Contractor	Pre-Construction
During Construction		
Ensure the subcontractor takes measures to include spill containment procedures and appropriate storage and control of chemical facilities.	Building Contractor	During Construction
Follow Incident Management Procedures at all times	Building Contractor	During Construction
To manage risks associated with trip hazards, overhead hazards and other potential hazards surrounding the site: Fully fence the site and ensure all materials are Building Contractor contained within it. • Provide signage that advises of the works and alternate access arrangements around the area; and • Provide separate visitor access to the site that avoids construction areas.	Building Contractor	During Construction
During Operation		
Develop spill control procedures, the use of chemical spill kits, protocols for personnel entering hazardous area zones, report environmental incidents, carry out preventative maintenance on environmental management equipment, emergency response procedure, emergency evacuation procedures, environmental housekeeping and training of a first response fire crew.	Tenant	During Operation
Monitoring Procedures		
Monitor procedures relating to hazards and risk.	Tenant	During Operation
Air Quality Action Plan		
Requirement	**Responsibility**	**Timing**
During Construction		
Ensure dust suppression resources are provided on site eg water carts.	Building Contractor	During Construction
Ensure trafficable areas are clearly defined and	Building Contractor	During Construction

stabilized.		
Maintain construction equipment including trucks and vehicles to reduce exhaust emissions.	Building Contractor	During Construction
Control any dust generated from the works by on site watering as required.	Building Contractor	During Construction
Keep dust generating activities to a minimum during dry and windy conditions	Building Contractor	During Construction
Load and cover trucks and ensure the tailgates of all trucks transporting spoil from the site are securely fixed prior to loading and immediately after unloading.	Building Contractor	During Construction
Minimise diesel pollutant impacts on surrounding land uses by turning off diesel combustion engines on construction equipment not in active use and ensuring that vehicles are well maintained.	Building Contractor	During Construction
Cover or spray stockpiles to suppress dust as required.	Building Contractor	During Construction
During Operation		
Regular maintenance of dryer burners;	Tenant	During Operation
Good environmental housekeeping within the facility with special emphasis on the following: ○ Removal of any build up dust from trim cutters; ○ Routine use of floor sweeps to remove trim not captured by the trim collection system; ○ Routine removal of dust from horizontal surfaces; ○ Routine removal of dust within the pelletiser area to prevent its accumulation on horizontal surfaces.	Tenant	During Operation
Monitoring Requirements		
Visually inspect the site on a regular basis to check for deposition of dust.	Building Contractor	
Visually inspect printing facility on daily basis.	Tenant	During Operation
Noise and Vibration Action Plan		
Pre-Construction	**Responsibility**	**Timing**
Ensure all equipment have adequate noise prevention safeguards such as mufflers etc	Building Contractor	During Construction
Provide mechanism to ensure that any complaints arising from noisy activities are addressed	Building Contractor	During Construction
Ensure that the technical specifications for all subcontractor plant and equipment are written to incorporate consideration of noise mitigation procedures	Building Contractor	During Construction
During Construction		
Conduct construction activities in accordance with the	Building Contractor	During Construction

noise objectives and procedures identified in the Noise Management Plan to be prepared as part of the Construction Environment Management Plan.		
The hours of construction associated with the development are limited to: • 7:00am to 6:00pm Monday to Friday; • 8:00am to 1:00pm Saturdays; and • No work on Sundays or public holidays.	Building Contractor	During Construction
Establish and ensure regular use of effective communication with relevant stakeholders.	Building Contractor	During Construction
In the event of noise complaint, implement complaint procedures.	Building Contractor	During Construction
Instruct subcontractors and other personnel to maintain vehicles and equipment to ensure manufacturers noise control equipment remain intact.	Building Contractor	During Construction
Maintain truck routes on site in good condition.	Building Contractor	During Construction
Maintain low speeds at the construction site to minimize engine noise.	Building Contractor	During Construction
Ensure trucks are fully loaded so that the volume of each delivery is maximised and the number of trips is therefore minimized.	Building Contractor	During Construction
During Operation		
Induction and certification for truck drivers to operate trucks on the site at less than 20kph.	Tenant	During Operation
Induction and certification for truck drivers to operate trucks without exhaust brakes whilst on site.	Tenant	During Operation
Procedures for residents to contact site management in regard to complaints or additional information.	Tenant	During Operation
Follow-up procedures to inform residents of actions implemented following any noise complaints.	Tenant	During Operation
Monitoring Requirements		
Carry out noise compliance checks as necessary on all major equipment.	Building Contractor	During Construction
If complaints are received, monitor noise as will be recommended in the Construction Environment Management Plan.	Building Contractor	During Construction
Regular inspections of all site plant including trucks to ensure that the installed noise suppression units are functioning and require no maintenance; and	Tenant	During Operation
Regular audits at sensitive receiver locations to identify additional procedures to minimize noise emissions from the site.	Tenant	During Operation

Erosion, Sedimentation and Water Quality Action Plan		
Requirement	**Responsibility**	**Timing**
Pre-Construction		
Install sedimentation pond as per the Soil and Erosion Plan.	Building Contractor	During Construction
All boundaries to be provided with siltation fencing and protection of stormwater system.	Building Contractor	During Construction
During Construction		
Implement the Soil and Erosion Plan.	Building Contractor	During Construction
Divert runoff generated outside the work areas around the construction site and divert to sedimentation pond.	Building Contractor	During Construction
All construction vehicles exiting the site will depart via a wheel wash facility.	Building Contractor	During Construction
Maintain all construction equipment and regularly inspect for leaks, fuels and oils.	Building Contractor	During Construction
Post Construction		
Stabilise soils as soon as practicable after disturbance.	Building Contractor	Post Construction
Progressively landscape all disturbed areas to their original condition and in accordance with Landscape Plan prepared by Environmental Partnership.	Building Contractor	Post Construction
Remove all temporary erosion and sedimentation control measures.	Building Contractor	Post Construction
Gross pollutant traps to treat litter and other coarse sediments from the surface runoff prior to discharging into the bio-retention swale.	Building Contractor/ Tenant	During Construction and Operation
Monitoring Requirements		
Visually monitor water run off for oils and grease after rainfall events.	Building Contractor/Tenant	During Construction and Operation
Greenhouse Gas Action Plan		
Requirement	**Responsibility**	**Timing**
Prepare Base Year GHG Inventory;	Tenant	During Operation
Verification of the Base Year GHG Inventory by an independent third party;	Tenant	During Operation
Identification of activities to reduce GHG emissions or increase GHG removals;	Tenant	During Operation
Annual reporting of GHG emissions in accordance with NGER Legislation;	Tenant	During Operation
Identification of activities to reduce GHG emissions or	Tenant	During Operation

increase GHG removals; and		
Implementation of identified opportunities to enable reduction in GHG emissions and/or increase in GHG removals.	Tenant	During Operation

6.0 Statement of Commitments

In accordance with the Director-General Requirements, a Statement of Commitments indicating how environmental impacts arising from the proposal will be managed and minimized is provided.

If approved and acted upon, the Proponent will undertake the project in accordance with the following commitments.

Administrative Commitments

Commitment to minimise harm to the Environment

The Proponent will implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction and operation of the project

Terms of Approval

The Proponent will carry out the project generally in accordance with the:

a) Environmental Assessment Report dated July 2009 prepared by Paclib Management including accompanying appendices.
b) Drawings prepared by Paclib Industrial and listed below
c) Statement of Commitments
d) Conditions of Approval

Drawings

Architectural Drawings

Plan No:	Plan Name	Revision No	Prepared by:
DA 000	Cover Sheet and Title Page	C	PacLib Industrial
DA 002	Site Plan	C	PacLib Industrial
DA 003	Site Analysis	C	PacLib Industrial
DA 004	Traffic Flow Plan	B	PacLib Industrial
DA 010	Shadow Diagrams-Summer	A	PacLib Industrial
DA 011	Shadow Diagrams-Winter	A	PacLib Industrial
DA 100	Warehouse 1 Plan	C	PacLib Industrial
DA 101	Warehouse 2 and 3 Plan	B	PacLib Industrial
DA 105	Warehouse 1 Roof Plan	B	PacLib Industrial
DA 106	Roof Plan Warehouse 2 & 3	A	PacLib Industrial
DA 110	Office 1 Plans	B	PacLib Industrial
DA 111	Office 2 Plans	A	PacLib Industrial
DA 112	Internal Office 3 Plans	A	PacLib Industrial

DA 200	Elevations	B	PacLib Industrial
DA 201	Warehouse 1 Elevations	B	PacLib Industrial
DA 202	Warehouse 2 & 3 Elevations with Signage Details	B	PacLib Industrial
DA 203	Office 1 and 2 Elevations	B	PacLib Industrial
DA 205	Perspectives	B	PacLib Industrial
DA 210	Warehouse sections	B	PacLib Industrial

Landscape Drawings

Plan No:	Plan Name	Revision No	Prepared by:
	Landscape Design Statement		Environmental Partnership
2755.LP/01	Landscape Concept	C	Environmental Partnership
2755/LP/02	Landscape Plan Area 1	C	Environmental Partnership
2755/LP/03	Landscape Plan Area 2	C	Environmental Partnership
2755/LP/04	Landscape Plan Area 3	C	Environmental Partnership
2755/LP/05	Landscape Plan Area 4	C	Environmental Partnership

Stormwater Drawings

Plan No:	Plan Name	Revision No	Prepared by:
SW 101	Stormwater Drainage Concept Plan Site Layout Plan	C	S& G Consultants
SW 102	Stormwater Drainage Concept Plan Site Layout Plan	C	S& G Consultants
SW 103	Stormwater Drainage Concept Plan Site Layout Plan	C	S& G Consultants
SW 104	Stormwater Drainage Concept Plan Site Layout Plan	C	S& G Consultants
SW 105	Stormwater Drainage Concept Plan Site Layout Plan	C	S& G Consultants
SW 106	Stormwater Drainage Concept Plan Site Layout	C	S& G Consultants
SW 107	Stormwater Drainage Concept Plan Details	D	S& G Consultants
SW 108	Stormwater Drainage Concept Plan Site Layout	B	S& G Consultants
SW 109	Stormwater Drainage Concept Plan Site Layout	A	S& G Consultants
SW 110	Stormwater Drainage Concept Plan Site Layout	D	S& G Consultants

If there is any inconsistency between the above, the conditions of this approval shall prevail to the extent of the inconsistency.

Construction Certificate

The Proponent will obtain a Construction Certificate prior to any engineering or building works.

Director General Requirements

The Proponent will comply with any reasonable requirements of the Director-General arising from the Department's assessment of:

- Any reports, plans, strategies, programs or correspondence that are submitted in accordance with the approval; and
- The implementation of any actions or measures contained in these reports, plans, strategies, programs or correspondence.

Building Code of Australia

The Proponent will ensure that the buildings and structures on the site are constructed in accordance with the relevant requirements of the *Building Code of Australia*. In addition, under Part 4A of the *Environmental Planning and Assessment Act, 1979,* the Proponent or its designated builder are required to obtain construction and occupation certificates for the proposed building works. Part 8 of the *Environmental Planning Assessment Act Regulations* sets out the requirements for the certification of the project.

Services

The Proponent will comply with the requirements of relevant public authorities in regard to the connection to, relocation and/or adjustment of services affected by the construction of the proposed development.

Prior to Construction Phase

Construction Environmental Management Plan (CEMP)

The Proponent will prepare and implement a *CEMP*, in accordance with the Department of Planning's *Guideline for the Preparation of Environmental Management Plans* to outline all environmental management practices and procedures to be followed during the construction of the project. The *CEMP* is to contain the following plans and studies:

- An erosion and sediment control plan incorporating the principles outlined in the Stormwater Concept Plan prepared by S&M Consulting;

- Construction Management Plan including details, inter alia, in regard to provision of required amenities for construction works, protocols for the management of construction traffic, management of demolition and construction waste, complaints handling and occupational health and safety matters;

- A Dust Management Plan;

- A Noise Management Plan to detail measures to minimise noise emissions during the construction of the development. All construction works on the site, including excavation and placement of fill, will be undertaken in accordance with the EPA's *Environmental Noise Control Manual;* and

- Construction Traffic Management Plan

Safety Plan

The construction contractor will establish a Safety Plan before work commences on site to detail safe work methods and procedures to be followed on site and to ensure compliance with Occupational Health & Safety and statutory requirements. Such a plan is to address safety risks during demolition, excavation and construction activities: including:

- Stability of adjacent structures;
- Excavation support;
- Fall from heights;
- Protection of the public;
- Traffic controls around the perimeter of the site, and
- Working with high voltage electricity supply.

Construction Phase

Hours of Construction Work

Construction works including deliveries of materials to and from the site would be undertaken within the Department of Environment and Climate Change (DECC's) *Environmental Noise Control Manual,* namely:

- 7:00am to 6:00pm Monday to Friday;
- 8:00am to 1:00pm Saturdays; and
- No work on Sundays or public holidays.

Site Notices/Documentation

The building contractor will ensure that a 24 hour contact telephone number is displayed and attended by a person with authority over the works for the duration of the project.

A site notice will be prominently displayed on the boundary of the site for the purpose of informing the public of the project details.

A copy of the approved and certified plans, specifications and documents including conditions of approval will be kept on site at all times.

Protection of Public Places and Local Approvals

The Proponent undertakes to obtain any necessary approval under the *Local Government Act 1993.*

The Proponent undertakes to ensure that the public way is not obstructed by any materials, vehicles, skips or the like during the construction period.

Access and Car Parking

The proposed access, parking layout and servicing will be provided in accordance with the design requirements of *Australian Standards* 2890.1-2004 (car access) and *Australian Standards* 2890-2 (heavy vehicle access).

Air Quality

Appropriate dust control measures will be implemented during the preparation and construction stages of the proposed development.

Stormwater Management

Stormwater and drainage works on site will be undertaken generally in accordance with the Stormwater Management Plan prepared by S&M Consulting. The following measures have been proposed to reduce the transfer of pollutants from the site:

- Roof runoff to be separated from surface runoff;
- Gross pollutant traps have been provided to treat litter and other coarse sediments from the surface runoff prior to discharging into the bio-retention swale; and
- A bio-retention swale has been allowed for in the landscaped setback fronting Lenore Drive to treat fine particles.

Water Management

A rainwater reuse tank, 100,000 litres capacity to capture the roof water for reuse in toilet flushing and irrigation of planter beds, use in printing processes and landscaped areas will be installed;

Soil and Erosion Management

Stormwater and drainage works on site will be undertaken generally in accordance with the Soil and Erosion Management Plan, based on the *Blue Book for Managing Urban Stormwater- Soils and Construction* prepared by S&M Consulting. During construction the Proponent shall carry out all reasonable and feasible measures to minimise soil erosion and the discharge from the site.

Urban Design

Development will take place generally in accordance with design guidelines contained in the *Penrith Council Erskine Park Employment Area Development Control Plan 2006.*

Hazardous Zoning

- That hazardous zones be implemented for equipment and areas where flammable liquids are stored . The hazardous zoning is to be established upon confirmation of design factors and accurate equipment locations at the construction phase of the project;

- That the ink tank farm be isolated from the building by either fire rated walls or separation distances in accordance with Australian Standards 1940-2004 *The Storage and Handling of Flammable and Combustible Liquids.*

Acoustic

Prior to construction all noise control measures should be reviewed and assessed in accordance with approval conditions and approved by an acoustic consultant.

The following acoustic measures have been recommended as options:

- Building Construction - General

- Building wall cladding (Warehouse 1 and 3) precast concrete tilt-up panels (Rw40-45) up to 2400mm above FFL and steel wall cladding (0.6mm BMT) above 2400mm above FFL and steel wall cladding (0.6mm BMT) above 2400mm FFL (noting upgraded acoustic performance required for Warehouse 2- Print/Finish Areas);

- Building roof cladding (Warehouse 1 and 3) consisting of sheet metal (min 0.6BMT) over fiberglass building blanket and medium duty thermofoil or similar and provide a minimum installed Rw22 or greater (noting upgraded performance required for Warehouse 2 – Print/Finish Areas);

- Any translucent panels proposed within warehouse building facades or roofs shall be specified taking into account required acoustic performance in order to control breakout noise from internal activities. Any proposed translucent panel areas shall be subject to detailed review by Acoustic Consultant prior to final specification;

- Any penetrations of roof or walls shall be acoustically detailed to control breakout noise. All penetration details should be subject to acoustic review prior to final specification;

- Specification of fast acting roller doors for warehouse buildings and controlled to remain closed except for short duration opening to allow truck and/or fork truck access. Proposed fast acting roller doors selected on acoustic performance and a minimum installed noise reduction of 20dBa (A);

- Construction of an acoustic wall (Boral Ezyshield, Fleetwood, Sentinel, masonry or equivalent) to a height not less than three (3) metres above FFL (RL 66.9) extending from the eastern building facade approximately 30m east and adjacent the northern side of the night drop off zone (figure 2). The acoustic wall would be subject to review by qualified Acoustic Consultant following EA approval and during the design development phase of the compliance with Consent Conditions;

- Where practical fixed and mobile plant be fitted with low level or broadband ‘quacker’ reversing alarms.

Building Construction – Warehouse 2

(Printing)

- Roof construction acoustically upgraded to provide a minimum installed noise reduction in order of 37dBa(A) or Rw43;

- Wall (west) construction acoustically upgraded to provide a minimum installed noise reduction in order of 29dB(A) or Rw35 *(eastern side of printing area separated from external facade by workshop and computer room)*

  OR

- Provide acoustic enclosure / 'room' to contain printing machines in order to reduce space averaged internal noise levels at the internal surface of the building walls to LAeq 75dB(A) and rt

OR

- Selection of printing machines to reduce space averaged internal noise levels at the internal surface of the building walls to LAeq 75dB(A) and roof to LAeq 67dBa(A) or less;

OR

(Finishing)

- Roof construction acoustically upgraded to provide a minimum installed noise reduction in order of 27dB(A) or Rw33;

OR

- Provide acoustic enclosure / 'room' to contain finishing machines in order to reduce space averaged internal noise levels at the internal surface of the roof to LAeq 65 dB(A) or less;

OR

- Selection of finishing machines to reduce space averaged internal noise levels at the internal surface of the building roof to LAeq 65dB(A) or less.

Operational Phase

Hours of Operation

The use of the premises will operate 24 hours per day, 7 days a week.

Waste Management

Site preparation, construction and operation of the development will be undertaken in accordance with a waste management plan. All wastes generated during the construction and operation of the facility will be classified and disposed of if necessary in accordance with the EPA's *Environmental Guidelines: Assessment, Classification and management of Liquid and Non- Liquid Wastes.*

The tenant will ensure that all waste generated on site during operation is classified in accordance with DECC's *Waste Classification Guidelines* and disposed to a facility that lawfully may accept the waste.

Landscaping Plan and Buffer Treatment

Landscaping of the site will generally be undertaken in accordance with the detailed Landscape Plan and Report prior to occupation of the premises. Details of the landscape buffer to shield the development from residents to the north is to be planted on land within Transgrid easement with Transgrid approval prior to occupation.

Fire Safety

A fire safety study in accordance with the Department of Planning's *Hazardous Industry Planning Advisory Paper No.2-" Fire Safety Guidelines*" will be submitted prior to Occupation.

Lighting

Provision will be made for external lighting during the detailed design phase. External lighting will be installed and maintained in accordance with *AS 4282 – 1997 – Control of Obtrusive Effects of Outdoor Lighting.*

Air Quality

The tenant of the printing facility is to implement the following safeguards:

- Regular maintenance of dryer burners;
- Good environmental housekeeping with the facility with special emphasis on the following removal of any build up dust from trim cutters;
  -Routine use of floor sweepers to remove trim not captured by the trim collection system;
  - Routine removal of dust from horizontal surfaces;
  - Routine removal of dust within the pellitiser area to prevent its accumulation on horizontal surfaces.
- Properly maintained ventilation of the printing press area by ensuring natural ventilation louvers are not blocked;
- Maintain trafficked areas free of dust; and
- Maintenance of roadway surfaces.

Ecologically Sustainable Development (ESD)

ESD measures outlined in Environmental Assessment Report will be implemented during construction and operation of the building.

Greenhouse Gases

That the tenant of the printing facility implement a Greenhouse Gas Action Plan at the proposed facility to include:

- Base Year GHG Inventory;
- Verification of the Base Year GHG Inventory by an independent third party;
- Annual reporting of GHG emissions in accordance with NGER Legislation;
- Identification of activities to reduce GHG emissions or increase GHG removals; and
- Implementation of identified opportunities to enable reduction in GHG emissions and/or increase in GHG removals.

Management of Operational Noise

The protection of acoustic amenity for the premises and surrounds during operation will be carried out generally in accordance with recommendations made in the Acoustic Report prepared by Atkins Acoustics.

Once operational, all on site plant will be assessed and diagnosed by a qualified acoustic consultant to establish whether further noise controls at source are reasonably practicable. Specifically:

- Air-conditioning systems and exhaust fans selected on acoustic performance and subject to detailed acoustic review and assessment prior to final specification to ensure that noise goals are satisfied; and

- Details of mechanical plant, equipment, processes and activities shall be subject to detailed review by an Acoustic Consultant prior to final specification;

In addition, within three months of commissioning of the facility, site inspections and noise measurements be conducted by a qualified Acoustic Consultant to demonstrate that the operation of the facility satisfies the project specific noise goals.

The Proponent will prepare an Operational Noise Management Plan which includes:

- Induction and certification for truck drivers to operate trucks on the site at less than 20kph;
- Induction and certification for truck drivers to operate trucks without exhaust brakes whilst on site;
- Procedures for residents to contact site management in regard to complaints or additional information;
- Follow-up procedures to inform residents of actions implemented following any noise complaints;
- Regular inspections of all site plant including trucks to ensure that the installed noise suppression units are functioning and require no maintenance; and
- Regular audits at sensitive receiver locations to identify additional procedures to minimize noise emissions from the site.

Operational Noise- General

The Tenants will implement measures to manage and mitigate any acoustic impacts to meet the requirements of the Department of Environment and Climate Change's *Industrial Noise Policy* during operation of the premises.

The use of the site shall not give rise to the emission of an "offensive noise" as defined in the *Protection of the Environment Operations Act.*

Storage of Gases

The method of gas cylinder storage is to comply with *Australian Standards AS 4332-2004: The Storage and handling of gases in cylinder*s. As the LPG cylinders would be stored without other gases the storage area will also need to comply with *Australian Standards 1596:2008: The storage and handling of LPG Gas.*

Corrosive Substances

Provision for natural ventilation and method of storage of corrosive substances is to be established in accordance with *Australian Standards 3780-2008: The Storage and Handling of Corrosive Substances.*

The dispersion of hydrogen gas, in to be in accordance with *Australian Standards 2676.1-1992: Guide to the Installation and Maintenance, Testing and Replacement of Secondary Batteries in Buildings and AS 3011-1992: Electrical Installations- Secondary Batteries Installed in Buildings.*

Hazards Management

That the tenant of the printing facility implement environmental safeguards to provide sufficient protection to the site if a pollution incident occurred, including: identification of flammable and combustible liquids, storage and handling of flammable and combustible liquids, use of firefighting equipment, safety inspections, general emergency procedures, fire and explosion emergency procedures, evacuation procedure and operation of the fire fighting water containment system.

7.0 Project Justification and Consideration of Alternatives

7.1 Project Justification

The justification for undertaking this project seen from the perspective of the different stakeholders can be summarised as follows:

The Proponent:

a) The subject site is zoned 4(e1) Employment pursuant to *PLEP 1994,* and the proposed uses for printing, warehouse and distribution facilities are permissible with consent.

b) The development of 10.5 hectares of industrial land, bulk earthworks complete ready for the construction of printing, warehouse and distribution facilities;

c) The opportunity to create 80-100 construction jobs and approximately 180 operational jobs.

The Occupants

The justification from the perspective of the first occupant (Warehouse 1) is:

a) The occupant can operate from a state of the art cross docking facility, designed to facilitate rapid unloading, staging and re-loading of goods destined for local distribution. Operational costs are reduced because of the efficient layout of the premises and its location relative to state and regional transport infrastructure. The facility will employ at least 17 employees.

The justification from the perspective of the second occupant (Warehouse 2) is:

b) The occupant can operate from a state of the art printing facility with all the latest technology achieving the highest possible quality with the most efficiency and with minimal effect on the environment. As has been shown in a number of the attached consultant reports, centralising the warehousing of paper, centralising printing and publishing facilities and finished product warehousing and localised delivery gives significant savings and brings a number of new employees (approximately 147).

The justification from the perspective of the second occupant (Warehouse 3) is:

c) The occupant can operate from a state of the art distribution centre, designed to store and distribute goods on a local, regional and national basis.

The Community

The justification from the perspective of the community is:

d) Additional employment opportunities will be created in Western Sydney during the construction and operation of the proposed facilities as presently some of these facilities are based inter-state.

e) Additional capital investment would be injected into Erskine Park.

7.2 Consideration of Alternatives

It is proposed to construct a vehicle turning area in the north-western part of the site to enable trucks accessing Warehouse 2 for waste compactor collection and ink drop off omitting the need to travel around the perimeter of Warehouse 3. The turning area is located within the Integral Energy easement. The turning area has been designed to facilitate a 19 metre semi-trailer to turnaround. As an alternative, the turning circle could be abandoned and service vehicles could travel around the perimeter of the site in order to exit the site. Nevertheless, Integral Energy have granted their consent for a right of way over their easement.

8.0 Conclusion

The information contained in the Environmental Assessment demonstrates that the Part 3A Project Application will not result in any adverse environmental impacts which cannot be managed or mitigated through the implementation of appropriate strategies in the construction and operation stages of the development.

The proposed development for printing, warehouse and distribution facilities is permissible with the consent of the Minister of Planning pursuant to the provision of Part 3A of the *EP&A, Act 1979*. The proposed development is generally consistent with the aims, objectives and planning controls relating to the site, in particular *Penrith Local Environmental Plan 1994,* and *Penrith Council Development Control Plan 1996.*

The proposal will generate approximately 80-100 construction jobs and approximately 180 operational jobs and in this regard is an opportunity to realise the objectives of the *Western Sydney Employment Area SEPP* and *Metropolitan Strategy*.

The proposed development is suitable for the site on the basis that:

- The proposal is consistent with the relevant objectives of the *Metropolitan Strategy* and *Western Sydney Employment Area 2009 SEPP* in that it will assist in meeting employment targets and provides an appropriate employment generating use;
- It will not have any detrimental environmental impacts on any adjoining properties; and;
- It will have synergies with the future development of the surrounding industrial estate and wider precinct and will provide positive economic benefits.

The site is suitable for the proposed development in that:

- The site has been cleared and bulk earthworks have been completed;
- The site does not present flora and fauna or aboriginal heritage issues;
- The site lies within one of the four major sites rezoned for employment purposes in the Western Sydney Employment Area;
- The land is not contaminated and is suitable for printing, warehouse and distribution facilities incorporating office uses;
- The site provides good access to Lenore Drive, Erskine Park Road and the M4 and M7 Motorways; and
- There will be no amenity issues posed as mitigation measures in regard to air quality, dust, hazards, noise and traffic have been proposed.

There are no significant impacts that would prevent the approval of the development in its current form. The building exhibits satisfactory architectural and design merit. The design of the building incorporates a variety of structural elements, materials and colours and will add visual interest when viewed from the street.

Safeguard measures have been considered and included in the design and operation of the facility to ensure that the safety and amenity of the neighbouring premises would not be affected by the proposed development. The measures outlined in the Statement of Commitments describe the range of actions that will be undertaken to manage on-site impacts during the construction and ongoing operation of the development.

An assessment of all of the issues raised in the Erskine Park Employment Area indicates that the Major Project Application is able to be conducted in a manner that would not result in any significant environmental impacts to the amenity of surrounding land users. In light of the merits of the proposed development for printing, warehouse and distribution facilities, it is requested that the Minister grant approval to the Part 3A Project as proposed.