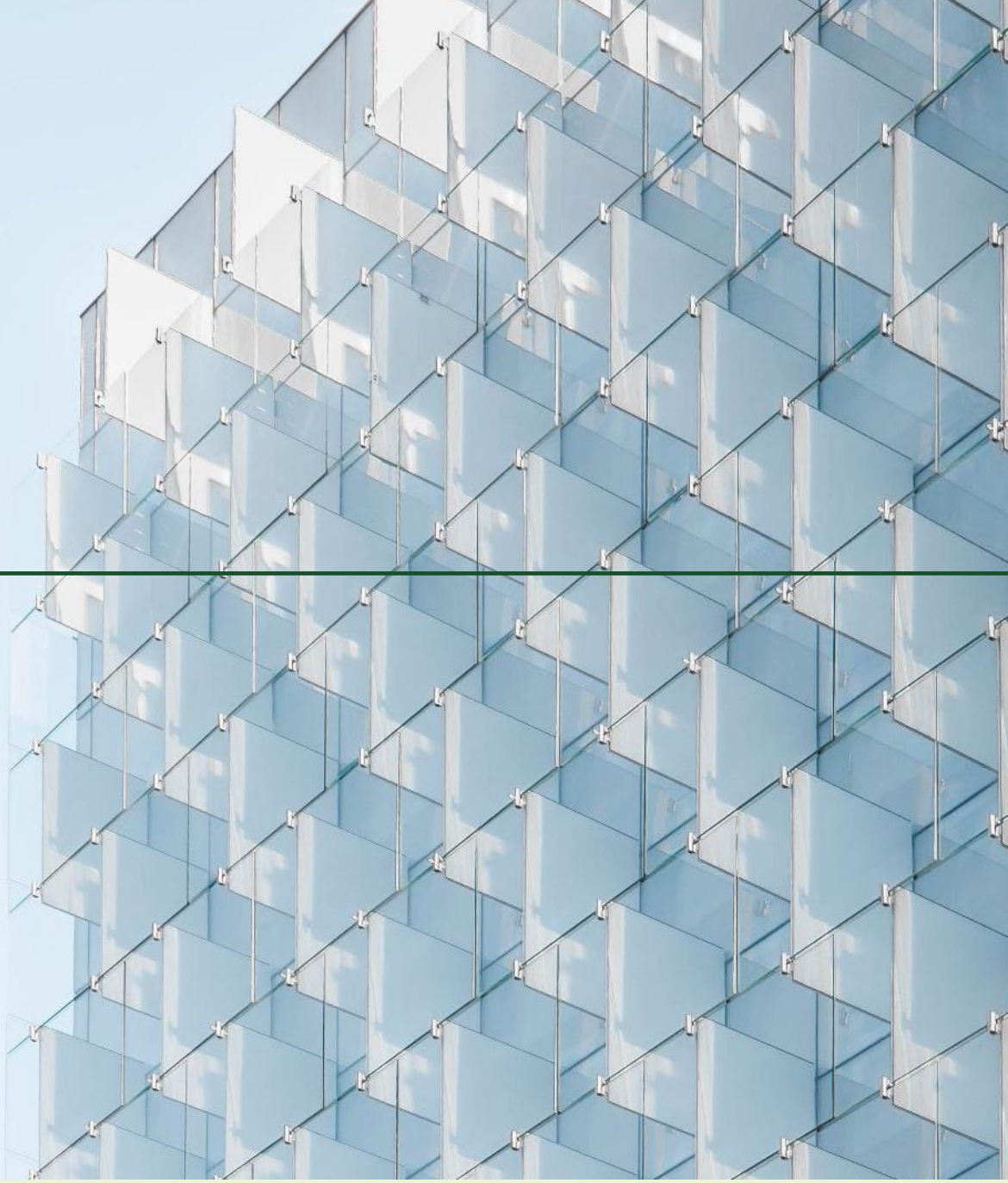
Ref: **SSD-18204994**
WTJ21-057



WILLOWTREE PLANNING

ENVIRONMENTAL IMPACT STATEMENT:
PROPOSED INDUSTRIAL FOOD MANUFACTURING FACILITY

2 AND 14 DISTRIBUTION DRIVE, ORCHARD HILLS
LOT 10 AND 11 DP 271141

—

Prepared by Willowtree Planning Pty Ltd
on behalf of Snack Brands Australia

24 August 2021

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WILLOWTREE
PLANNING

DOCUMENT CONTROL TABLE			
Document Reference:	SSD-18204994_Environmental Impact Statement		
Contact:	Eleisha Burton		
Version and Date	Prepared by	Checked by	Approved by
Version No. 0 – DRAFT (25/05/2021)	Eleisha Burton Associate	Andrew Cowan Director	Andrew Cowan Director
Version No. 1 – DRAFT (08/07/2021)	Eleisha Burton Associate	Andrew Cowan Director	Andrew Cowan Director
Version No. 2 – FINAL (12/08/2021)	Eleisha Burton Associate	Andrew Cowan Director	Andrew Cowan Director

SECTION 4.12 CERTIFICATE

Declaration Form	**Submission of Environmental Impact Statement (EIS)** prepared under the *Environmental Planning and Assessment Act 1979 – Part 4, Division 4.3, Section 4.12*
EIS Prepared by	
Name	Eleisha Burton
Qualifications	Bachelor of Planning Graduate Diploma of Environmental Management
Address	Suite 4, Level 7 100 Walker Street North Sydney, NSW 2060
In Respect of	SSD-18204994 Proposed Industrial food manufacturing facility
Development Application	
Applicant Name	Snack Brands Australia
Applicant Address	Building E, Level 3, 24 – 32 Lexington Drive Bella Vista NSW 2153
Land to be Developed	2 and 14 Distribution Drive, Orchard Hills 2748 – includes parcels: ▪ Lot 10 DP 271141 ▪ Lot 11 DP 271141
EIS	This document contains a complete EIS
Certificate	I certify that I have prepared the contents of this EIS to the best of my knowledge: ▪ it is in accordance with Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*, ▪ contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure to which the statement relates, and ▪ that the information contained in the statement is neither false nor misleading.

Signature 

Name	Eleisha Burton
Position	Associate
Qualification	BPlan, JCU GradDipEnvMgt, CQU
Date	24 August 2021

Signature 

Name	Andrew Cowan
Position	Director
Qualification	BURP, UNE MPD, UTS
Date	24 August 2021

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APPENDICES

GLOSSARY OF KEY TERMS

TERM	MEANING
AHD	Australian height datum
BAM	Biodiversity Assessment Methodology
BCA	Building Code of Australia
BC Act	*Biodiversity Conservation Act 2016*
BC Regulation	*Biodiversity Conservation Regulation 2017*
BDAR	Biodiversity Development Assessment Report
BOS	Biodiversity Offset Scheme
CIV	Capital investment value
Council	Penrith City Council
DPIE	Department of Planning, Industry and Environment
DCP	Development Control Plan
EIS	Environmental Impact Statement
EP&A Act	*Environmental Planning and Assessment Act 1979*
EP&A Regulation	*Environmental Planning and Assessment Regulation 2000*
EPA	Environment Protection Authority
EPBC Act	*Commonwealth Environment Protection and Biodiversity Conservation Act 1999*
EPI	Environmental Planning Instrument
ESD	Ecologically Sustainable Development
GFA	Gross Floor Area
GSC	Greater Sydney Commission
ISEPP	*State Environmental Planning Policy (Infrastructure) 2007*
LGA	Local Government Area
MNES	Matter of National Environmental Significance
MW	Megawatt
NSW RMS	NSW Roads and Maritime Services
OEH	NSW Office of Environment and Heritage
POEO Act	*Protection of the Environment Operations Act 1997*
RL	Reduced level
SBA	Snack Brands Australia
SEARs	Secretary's Environmental Assessment Requirements (SSD-18204994), dated 27 May 2021
SEPP	State Environmental Planning Policy
SEPP 33	*State Environmental Planning Policy No. 33 — Hazardous and Offensive Development*
SEPP 64	*State Environmental Planning Policy No 64—Advertising and Signage*
Sqm or m²	Square metres
Subject site/site/study area	2 and 14 Distribution Drive, Orchard Hills
SRD SEPP	*State Environmental Planning Policy (State and Regional Development) 2011*
TfNSW	Transport for NSW
Willowtree Planning	Willowtree Planning Pty Ltd
WSEA SEPP	*State Environmental Planning Policy (Western Sydney Employment Area) 2009*

EXECUTIVE SUMMARY

This Environmental Impact Statement (EIS) has been prepared by Willowtree Planning Pty Ltd (Willowtree Planning), on behalf of Snack Brands Australia (SBA). The EIS is submitted to the New South Wales (NSW) Department of Planning, Industry and Environment (DPIE), in support of an application for State Significant Development (SSD), for the construction and operation of a food manufacturing facility, involving earthworks, provision of infrastructure and construction of a new industrial manufacturing facility at 14 Distribution Drive, Orchard Hills (Lot 10 DP 2771141), directly adjacent to the new automated Distribution Centre (SSD-9429) of 2 Distribution Drive, Orchard Hills (Lot 11 DP 271141). The proposal intends to allow for the consolidation of two (2) existing SBA operational sites, in Blacktown and Smithfield, into a single facility at Orchard Hills.

In short, the proposal involves:

- a new purpose-built industrial warehouse facility for industrial food manufacturing at 14 Distribution Drive, Orchard Hills; and
- an adjustment to the operations of the existing warehouse and distribution facility at 2 Distribution Drive, Orchard Hills, to include food manufacturing.

As such, the proposed development is afforded to land at 2 and 14 Distribution Drive, Orchard Hills, more formally described as Lot 10 DP 271141 (previously referred as Lot 9 within First Estate Precinct) and Lot 11 DP 271141 (previously referred as Lot 7 within First Estate Precinct). Such land is described throughout this EIS as the 'subject site'.

The subject site is located within the Penrith Local Government Area (LGA) and is zoned IN1 General Industrial under the provisions of *State Environmental Planning Policy (Western Sydney Employment Area) 2009* (WSEA SEPP). Development for the purpose of food manufacturing facility falls within the definition of Industries (other than offensive or hazardous industries), which are permissible with consent in the IN1 General Industrial zone under WSEA SEPP.

The proposed development satisfies the definition of SSD pursuant to:

- Schedule 1, Section 3 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP), being development for "Agricultural produce industries and food and beverage processing" with a Capital Investment Value (CIV) of more than $30 million.

As such, this EIS must be prepared in accordance with the Secretary's Environmental Assessment Requirements (SEARs).

Under the *Environmental Planning & Assessment Act 1979* (EP&A Act), it is required that a request for SEARs must be made prior to the lodgement of any application for SSD. SEARs were requested for the proposed development (reference: SSD-18204994) and later issued by the NSW DPIE on the 27 May 2021 (refer to **Appendix 1**).

In addition to the general requirements, the SEARs for the proposal outline several Key Issues to be addressed as part of this EIS, including:

1. Statutory and strategic context
2. Suitability of the site
3. Community and stakeholder engagement
4. Noise and vibration
5. Air quality and odour
6. Traffic and transport
7. Urban design and visual
8. Food safety
9. Waste
10. Soil and water
11. Infrastructure requirements

12. Fire and incident management
13. Hazards and risk
14. Bushfire and incident management
15. Ecologically sustainable development
16. Biodiversity
17. Planning agreement/development contributions

The findings of this EIS identify that the proposal can be accommodated, subject to suitable management and mitigation measures, without any adverse environmental impacts beyond that considered appropriate by the relevant legislation.

Further, the proposed industrial food manufacturing facility would be consistent with the objectives of WSEA SEPP and relevant IN1 General Industrial zone. Based on the findings of this EIS, the proposal would support the continued use of the subject site for industry, providing employment opportunities in Western Sydney. The proposal is suitable for the local context and shall not result in any significant environmental impact. As such, it is recommended that the proposal be supported by the DPIE for approval, subject to reasonable and relevant conditions.

SITE CONTEXT

The subject site is legally described as Lot 10 DP 271141 and Lot 11 DP 271141, more commonly known as 2 and 14 Distribution Drive, Orchard Hills (previously 657-769 Mamre Road, Kemps Creek). The subject site has a combined area of approximately 104,323m^2, with the following split:

- Lot 10 (proposed facility): 51,711m^2
- Lot 11 (existing facility): 52,612m^2

The subject site forms part of the "First Estate Precinct", which comprises the southern portion of a larger precinct referred to as the Mamre West Land Investigation Area, located in Precinct 13 of the WSEA.

In its existing state, the subject site contains the newly constructed SBA warehouse and distribution facility (SSD-9429), which features a 37m tall high bay area. The subject site forms part of First Estate, developed by Altis Property Partners under SSD-7173. The northern portion of the subject site is undeveloped and accessible via Distribution Drive.

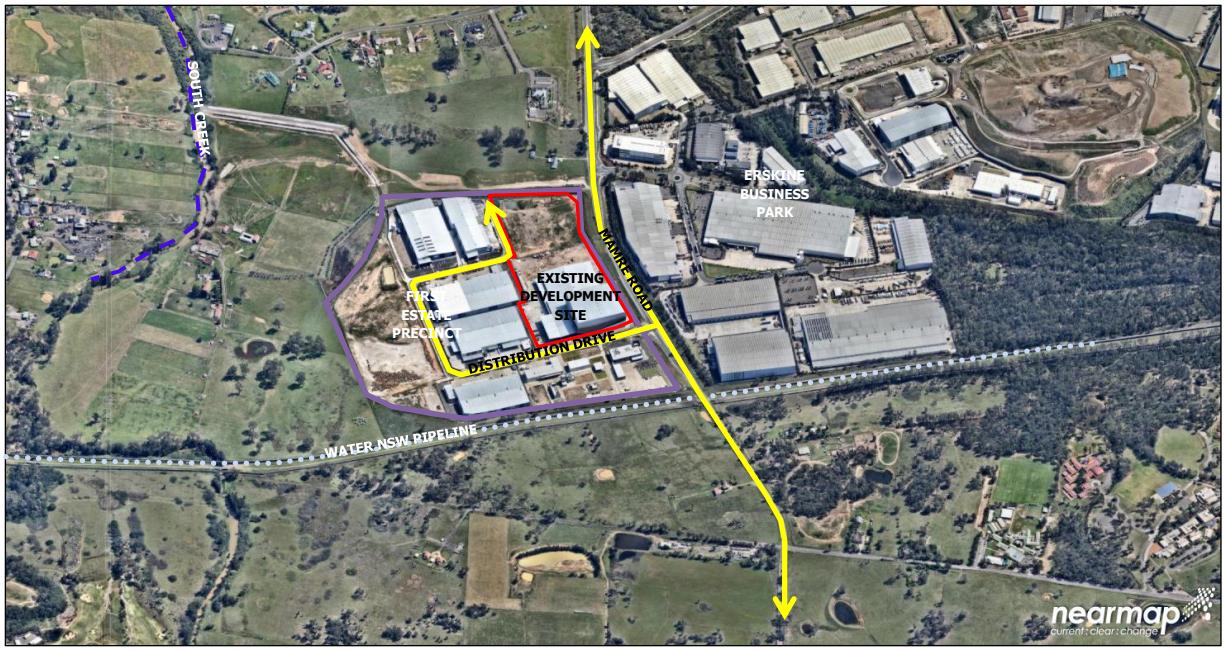


Figure 1 **Site Context Map** (Source: Nearmap, 2021)

PROJECT DESCRIPTION

Development consent under this proposal is sought for:

- Minor earthworks involving cut and fill works;
- Infrastructure comprising civil works and utilities servicing;
- Extension of existing warehouse and operation for food manufacturing facility (27,385m^2), comprising:
    - Warehouse area of 19,582m^2
    - Second stage addition of 2,813m^2
    - Ancillary office area of 2,485m^2
    - 160 car parking spaces
    - Wastewater treatment plant of 2,155m^2
    - Outdoor pallet storage area of 350m^2
- Change of use of 5,217m^2 of existing warehouse to food manufacturing;
- Production capacity up to 50,000mT/year;
- Storage of dangerous goods, comprising:
    - Class 8 – Packing Group II & III
    - Class 2.1 – LPG
    - Class 2.2 – Nitrogen
- Hours of operation being on a 24 hours per day, 7 days per week, basis.

PLANNING AND LEGISLATIVE FRAMEWORK

All relevant Federal and State legislation, as well as Environmental Planning Instruments (EPIs), have been considered in the preparation of this EIS. The proposal is satisfactory in terms of its legislative context, on the basis that:

- The proposal is permissible in the zone;
- The objectives of the zone are satisfied;
- The range of applicable SEPPs have been considered;
- Strategic documents that apply to the locality and wider region have identified that the proposed use is consistent with the strategic context of the area;
- The proposed development can satisfy the relevant provisions of the Building Code of Australia (BCA) and applicable Australian Standards.

Refer to **PART D** of this EIS.

PUBLIC NOTIFICATION AND CONSULTATION

A range of authorities have been consulted with during the preparation of this application. These include:

- Penrith City Council
- Environment Protection Authority
- Environment, Energy and Science Group (EES)
- Transport for NSW (TfNSW)
- NSW Fire and Rescue
- Sydney Water
- Department of Primary Industries: Food Authority
- WaterNSW
- Surrounding landowners and stakeholders
- Any other public transport, utilities or community service providers.

The consultation process is detailed in **PART E** and Appendix 16.

ENVIRONMENTAL IMPACT ASSESSMENT

An assessment of environmental impact has been undertaken against the relevant planning controls and policies. Additionally, a number of expert consultants have been engaged to specifically consider relevant aspects of the proposal. The environmental impact assessment has found that the proposed development complies with the relevant controls and it is considered that appropriate mitigation measures can be put in place to minimise any identified risks.

The proposed development is considered acceptable in a legislative sense.

JUSTIFICATION FOR THE PROPOSED DEVELOPMENT

Thorough consideration of the environmental impacts of the proposal has been undertaken in the environmental impact assessment process and in the preparation of the EIS. In assessing the impacts of the proposed development, consideration has been given to social, economic and environmental matters. As identified in this EIS, proposed development is not considered to represent an environmental risk, or a development that might be out of context with the surrounding locality.

OVERVIEW

The findings of this EIS demonstrate that the proposed development can proceed with consent. All assessed impacts have been examined and deemed acceptable, in relation to all the relevant legislative requirements applicable to the subject site. Furthermore, the proposed industrial food manufacturing facility is consistent with the objectives of the *A Metropolis of Three Cities – Greater Sydney Region Plan,* the *Western City District Plan* and the WSEA SEPP.

Based on the findings of this EIS, the subject site can successfully support an industrial food manufacturing facility, inclusive of related development, under this application, with acceptable environmental impacts. The proposed development is a logical use of an otherwise vacant industrial site that is contiguous to the existing SBA warehouse and distribution facility. The proposal is deemed to result in significant operational efficiencies for the SBA entity.

The proposed development is deemed suitable for its intended purpose, having regard to its regional and local context and would not result in any significant environmental impacts. As such, it is requested that the proposed development be approved, subject to reasonable and relevant conditions.

PART A PRELIMINARY

1.1 INTRODUCTION

This EIS has been prepared by Willowtree Planning, on behalf of SBA. The EIS is submitted to the DPIE, in support of an application for SSD, for the construction of a new warehouse facility and operation for industrial food manufacturing, at 2 and 14 Distribution Drive, Orchard Hills, more formally described as Lot 10 and 11 DP 271141.

The proposed development consists of an industrial food manufacturing facility, adjacent to the recently constructed warehouse and distribution centre of SSD-9429. The proposed development would be operated by SBA, concurrently with the neighbouring site, involving:

- a new purpose-built warehouse to operate as a food manufacturing facility (approximately 27,385m^2) at 14 Distribution Drive, Orchard Hills; and
- an adjustment to the operations of the existing warehouse and distribution centre at 2 Distribution Drive, Orchard Hills, to include industrial food manufacturing (conversion of 5,217m^2).

Whilst operating concurrently, SBA do not own both properties, and as such both properties will need to remain on separate titles.

The proposal seeks to operate 24 hours per day, seven (7) days per week, and would generate approximately 497 construction jobs for the new purpose-built industrial food manufacturing facility and a total of approximately 415 operational jobs for consolidated facility.

The particulars of this proposal are summarised below:

- Minor earthworks involving cut and fill works;
- Infrastructure comprising civil works and utilities servicing;
- Extension of existing warehouse and operation for food manufacturing facility (27,385m^2), comprising:
    - Warehouse area of 19,582m^2
    - Second stage addition of 2,813m^2
    - Ancillary office area of 2,485m^2
    - 160 car parking spaces
    - Wastewater treatment plant of 2,155m^2
    - Outdoor pallet storage area of 350m^2
- Change of use of 5,217m^2 of existing warehouse to food manufacturing;
- Production capacity up to 50,000mT/year;
- Storage of dangerous goods, comprising:
    - Class 8 – Packing Group II & III
    - Class 2.1 – LPG
    - Class 2.2 – Nitrogen
- Hours of operation being on a 24 hours per day, 7 days per week, basis.

This EIS describes the subject site and proposed development. It also responds to the SEARs and assesses the proposed development in terms of all relevant matters set out in legislation, EPIs and associated planning policies.

The structure of this EIS is as follows:

- **PART A PRELIMINARY**
- **PART B SITE ANALYSIS**
- **PART C PROPOSED DEVELOPMENT**
- **PART D LEGISLATIVE AND POLICY FRAMEWORK**
- **PART E CONSULTATION**
- **PART F ENVIRONMENTAL RISK ASSESSMENT**
- **PART G PLANNED MANAGEMENT AND MITIGATION MEASURES**
- **PART H PROPOSED DEVELOPMENT JUSTIFICATION**
- **PART I CONCLUSION**

1.2 PROJECT TEAM

The Project Team involved in the preparation of this application includes:

TABLE 1: PROJECT TEAM		
Documentation	**Consultant**	**Location**
Plans		
Survey Plan	Boxell Surveyors	**Appendix 4**
Architectural Plans	HLA Architects	**Appendix 5**
Landscape Plans	Geoscapes Landscape Architecture	**Appendix 6**
Civil Engineering Plans	Henry & Hymas Consulting Engineers	**Appendix 7**
Reports		
Acoustic Impact Assessment	Renzo Tonin & Associates	**Appendix 23**
Air Quality & Odour Impact Assessment	North Star Air Quality	**Appendix 22**
BCA Assessment Report	Mackenzie Group	**Appendix 21**
Biodiversity Assessment Report	Travers Bushfire & Ecology	**Appendix 12**
Bushfire Protection Assessment	Travers Bushfire & Ecology	**Appendix 13**
Dangerous Goods Design Report	Riskcon Engineering	**Appendix 19**
Ecologically Sustainable Development Report	Stantec	**Appendix 24**
Engagement and Communication Outcomes Report	SLR Consulting	**Appendix 16**
Environmental Impact Statement	Willowtree Planning	**Whole document**
Environmental Site Assessment	JBS&G	**Appendix 10**
Fire Safety Strategy Report	Omni Consulting Fire Engineers	**Appendix 20**
Stormwater Report	Henry & Hymas Consulting Engineers	**Appendix 14**
Geotechnical Investigation Report	PSM	**Appendix 11**
Infrastructure Report	Henry & Hymas Consulting Engineers	**Appendix 15**
Plan of Operational Management (Draft)	SBA	**Appendix 26**
Preliminary Hazard Analysis	Riskcon Engineering	**Appendix 18**
Quantity Surveyors Cost Report	Turner Townsend	**Appendix 2**
Traffic Impact Assessment	Ason Group	**Appendix 17**
Visual Impact Assessment Report	Geoscapes Landscape Architecture	**Appendix 8**
Waste Management Plan	SLR Consulting	**Appendix 25**

1.3 THE PROPONENT

See **TABLE 2** below for contact details.

TABLE 2: PROPONENT CONTACT DETAILS	
Company Details	Snack Brands Australia C/- Snack Brands Industries Pty Ltd
Contact Name	Filip Milic
Position	Capital Works and CI Manager
Contact Number	(02) 9609 0458
Email Address	Filip.Milic@snackbrands.com.au

1.4 CAPITAL INVESTMENT VALUE

The CIV of the proposed development in accordance with the CIV definition under the *Environmental Planning & Assessment Regulation 2000* (EP&A Regulation), is estimated to be $222,532,480.00.

A Quantity Surveyors (QS) Costings Report, prepared by Turner & Townsend, is included in **Appendix 2**.

1.5 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

An application requesting SEARs was submitted to the DPIE (reference: SSD-18204994). The SEARs were subsequently issued by DPIE on the 27 May 2021 and are addressed by this EIS.

For reference, the full SEARs, as issued, are annexed in **Appendix 1** of this EIS. An overview of how the SEARs have been satisfied are outlined in **TABLE 3** below. This EIS is also consistent with the minimum requirements for an EIS, as set out in Clauses 6 and 7 of Schedule 2 of the EP&A Regulation.

TABLE 3: HOW THE SEARS HAVE BEEN SATISFIED

Requirements	**Satisfied by**
General Requirements	
The EIS must be prepared in accordance with, and meet the minimum requirements of clauses 6 and 7 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000.	Refer to **Section 4.3.2** of this EIS.
The EIS must include: ▪ a detailed description of the development, including: - an accurate history of the site, including development consents - the need for the proposed development - justification for the proposed development - likely staging of the development - likely interactions between the development and existing, approved and proposed operations in the vicinity of the site - plans of any proposed building works - contributions required to offset the proposal and - infrastructure upgrades or items required to facilitate the development, including measures to ensure these upgrades are appropriately maintained.	Refer to **PART C** and **PART H** of this EIS.
▪ consideration of all relevant environmental planning instruments, including identification and justification of any inconsistences with these instruments	Refer to **PART D** of this EIS.
▪ consideration of the issues in Attachment 2 (public authority responses to key issues)	Refer to **PART E** of this EIS.
▪ a risk assessment of the potential environmental impacts of the development, identifying the key issues for further assessment	Refer to **PART F** of this EIS.
▪ a detailed assessment of the key issues specified below, and any other significant issues identified in this risk assessment, which includes: - a description of the existing environment, using sufficient baseline data - an assessment of the potential impacts of all stages of the development, including any cumulative impacts, taking into consideration relevant guidelines, policies, plans and statutes and - a description of the measures that would be implemented to avoid, minimise, mitigate and if	Refer to **PART F** and **PART G** of this EIS.

TABLE 3: HOW THE SEARS HAVE BEEN SATISFIED	
Requirements	**Satisfied by**
necessary, offset the potential impacts of the development, including proposals for adaptive management and/ or contingency plans to manage significant risks to the environment	
▪ a consolidated summary of all the proposed environmental management and monitoring measures, highlighting commitments included in the EIS.	Refer to **PART G** of this EIS.
The EIS must also be accompanied by:	
▪ high quality files of maps and figures of the subject site and proposal	**Whole document**
▪ a report from a qualified quantity surveyor providing:	Refer to **Section 1.4** and **Appendix 2** of this EIS.
– a detailed calculation of the capital investment value (CIV) of the proposal (as defined in clause 3 of the Environmental Planning and Assessment Regulation 2000) of the proposal, including details of all assumptions and components from which the CIV calculation is derived. The report shall be prepared on company letterhead and indicate applicable GST component of the CIV	
– an estimate of jobs that will be created during the construction and operational phases of the proposed development	Refer to **Section 3.2** and **Appendix 2** of this EIS.
– certification that the information provided is accurate at the date of preparation.	Refer to **Appendix 2** of this EIS.
Key Issues	
The EIS must address the following specific matters:	
1. Statutory and Strategic Context	
▪ detailed justification for the proposal and the suitability of the site	Refer to **Section 6.1.2** of this EIS.
▪ detailed justification that the proposed land use is permissible with consent	Refer to **Section 4.3.7** and **Section 6.1.2** of this EIS.
▪ details of any proposed consolidation or subdivision of land	Refer to **Section 6.1.1** of this EIS.
▪ detailed description of the history of the site, including the relationship between the proposed development and all development consents and approved plans previously and/or currently applicable to the site	Refer to **PART B** of this EIS.
▪ demonstration that the proposal is consistent with all relevant planning strategies, environmental planning instruments, adopted precinct plans, draft district plan(s) and adopted management plans and justification for any inconsistencies. This includes, but is not limited to: - State Environmental Planning Policy (Infrastructure) 2007 - State Environmental Planning Policy (Western Sydney Employment Area) 2009 - State Environmental Planning Policy (State and Regional Development) 2011 - State Environmental Planning Policy No. 33 – Hazardous and Offensive Development - State Environmental Planning Policy No. 55 – Remediation of Land - Penrith Local Environmental Plan 2010	Refer to **PART D** of this EIS.

TABLE 3: HOW THE SEARS HAVE BEEN SATISFIED	
Requirements	**Satisfied by**
- Greater Sydney Region Plan: A Metropolis of Three Cities - Our Greater Sydney 2056: Central City District Plan - Future Transport Strategy 2056	
2. Suitability of the Site	
▪ a detailed justification that the site can accommodate the proposed food manufacturing facility, having regard to the scope of the operations of the existing facility and its environmental impacts and relevant mitigation measures	Refer to **Section 6.1.2** of this EIS.
▪ details on the relationship of the development's operations with the adjoining Snack Brands Warehouse Facility (SSD-9429)	Refer to **Section 6.1.2** of this EIS.
3. Community and stakeholder engagement	
▪ a community and stakeholder participation strategy identifying key community members and other stakeholders	Refer to **PART E**, **Section 6.1.3** and **Appendix 16** of this EIS.
▪ details and justification for the proposed consultation approach(s)	Refer to **PART E**, **Section 6.1.3** and **Appendix 16** of this EIS.
▪ clear evidence of how each stakeholder identified in the community and stakeholder participation strategy has been consulted	Refer to **PART E**, **Section 6.1.3** and **Appendix 16** of this EIS.
▪ issues raised by the community and surrounding landowners and occupiers	Refer to **PART E**, **Section 6.1.3** and **Appendix 16** of this EIS.
▪ clear details of how issues raised during consultation have been addressed and whether they have resulted in changes to the development	Refer to **PART E**, **Section 6.1.3** and **Appendix 16** of this EIS.
▪ details of the proposed approach to future community and stakeholder engagement based on the results of consultation	Refer to **PART E**, **Section 6.1.3** and **Appendix 16** of this EIS.
4. Noise and vibration	
▪ a quantitative noise and vibration impact assessment undertaken by a suitably qualified acoustic consultant in accordance with the relevant Environment Protection Authority guidelines and Australian Standards which includes: – the identification of impacts associated with construction, site emission and traffic generation at noise affected sensitive receivers, including the provision of operational noise contours and a detailed sleep disturbance assessment – details of noise monitoring survey, background noise levels, noise source inventory and 'worst case' noise emission scenarios – consideration of annoying characteristics of noise and prevailing meteorological conditions in the study area – a cumulative impact assessment inclusive of impacts from other developments – details and analysis of the effectiveness of proposed management and mitigation measures to adequately manage identified impacts, including a clear identification of residual noise and vibration following application of mitigation these measures and details of any proposed compliance monitoring programs.	Refer to **Section 6.1.4** and **Appendix 23** of this EIS.

TABLE 3: HOW THE SEARS HAVE BEEN SATISFIED	
Requirements	**Satisfied by**
5. Air quality and odour	
▪ a quantitative assessment of the potential air quality, dust and odour impacts of the development in accordance with relevant Environment Protection Authority guidelines	Refer to **Section 6.1.5** and **Appendix 22** of this EIS.
▪ the details of buildings and air handling systems and strong justification for any material handling, processing or stockpiling external to buildings	Refer to **Section 6.1.5** and **Appendix 22** of this EIS.
▪ details of proposed mitigation, management and monitoring measures	Refer to **Section 6.1.5** and **Appendix 22** of this EIS.
6. Traffic and transport	
▪ details of all traffic types and volumes likely to be generated during construction and operation, including a description of key access / haul routes	Refer to **Section 6.1.6** and **Appendix 17** of this EIS.
▪ details on the relationship of traffic generation between the adjoining SSD-9429 and the development including pre and post-development traffic volumes	Refer to **Section 6.1.6** and **Appendix 17** of this EIS.
▪ an assessment of the predicted impacts of this traffic on road safety and the capacity of the road network, including consideration of cumulative traffic impacts at key intersections using SIDRA or similar traffic model	Refer to **Section 6.1.6** and **Appendix 17** of this EIS.
▪ plans demonstrating how all vehicles likely to be generated during construction and operation and awaiting loading, unloading or servicing can be accommodated on the site to avoid queuing in the street network	Refer to **Section 6.1.6** and **Appendix 17** of this EIS.
▪ details and plans of any proposed the internal road network, loading dock servicing and provisions, on-site parking provisions, and sufficient pedestrian and cyclist facilities, in accordance with the relevant Australian Standards	Refer to **Section 6.1.6** and **Appendix 17** of this EIS.
▪ details of the largest vehicle anticipated to access and move within the site, including swept path analysis	Refer to **Section 6.1.6** and **Appendix 17** of this EIS.
▪ swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site	Refer to **Section 6.1.6** and **Appendix 17** of this EIS.
▪ details of road upgrades, infrastructure works or new roads or access points required for the development if necessary	Refer to **Section 6.1.6** and **Appendix 17** of this EIS.
7. Urban Design and Visual	
▪ a visual impact assessment (including photomontages and perspectives) of the development layout and design (buildings and storage areas), including staging, site coverage, setbacks, open space, landscaping, height, colour, scale, building materials and finishes, façade design, signage and lighting, particularly in terms of potential impacts on: – nearby public and private receivers – significant vantage points in the broader public domain	Refer to **Section 6.1.7** and **Appendix 8** of this EIS.
▪ consideration of the layout and design of the development having regard to the surrounding vehicular, pedestrian and cycling networks	Refer to **Appendix 5** and **Appendix 17** of this EIS.
▪ detailed plans showing suitable landscaping which incorporates endemic species including an assessment of	Refer to **Section 6.1.7** and **Appendix 8** of this EIS.

TABLE 3: HOW THE SEARS HAVE BEEN SATISFIED	
Requirements	**Satisfied by**
the potential visual impacts of the project on the amenity of the surrounding area	
8. Food safety	
▪ in relation to food handling and processing and how NSW Food Authority standards and requirements will be met	Refer to **Section 3.2.4** and **Section 6.1.8** of this EIS.
9. Waste	
▪ details of the quantities and classification of all waste streams to be generated on site during the development	Refer to **Section 6.1.9** and **Appendix 25** of this EIS.
▪ details of waste storage, handling and disposal during the development	Refer to **Section 6.1.9** and **Appendix 25** of this EIS.
▪ details of the measures that would be implemented to ensure that the development is consistent with the aims, objectives and guidance in the NSW Waste Avoidance and Resource Recovery Strategy 2014-2021	Refer to **Section 6.1.9** and **Appendix 25** of this EIS.
10. Soil and Water	
▪ an assessment of potential surface and groundwater impacts associated with the development, including potential impacts on watercourses, riparian areas, groundwater, and groundwater-dependent communities nearby	Refer to **Section 6.1.10** of this EIS.
▪ a detailed site water balance including a description of the water demands and breakdown of water supplies, and any water licensing requirements	Refer to **Section 6.1.10** of this EIS.
▪ details of stormwater/wastewater management system including the capacity of onsite detention system(s), onsite sewage management and measures to treat, reuse or dispose of water	Refer to **Section 6.1.10** of this EIS.
▪ description of the measures to minimise water use	Refer to **Section 6.1.10** of this EIS.
▪ description of the proposed erosion and sediment controls during construction	Refer to **Section 6.1.10** of this EIS.
▪ characterisation of water quality at the point of discharge to surface and/or groundwater against the relevant water quality criteria (including details of the contaminants of concern that may leach from the waste into the wastewater and proposed mitigation measures to manage any impacts to receiving waters and monitoring activities and methodologies) and	Refer to **Section 6.1.10** of this EIS.
▪ characterisation of the nature and extent of any contamination on the site and surrounding area	Refer to **Section 4.3.9** and **Appendix 10** of this EIS.
11. Infrastructure requirements	
▪ a detailed written and/or graphical description of infrastructure required on the site, including any electrical substation/s and on-site switch yard/s	Refer to **Section 6.1.11** and **Appendix 15** of this EIS.
▪ identification of any infrastructure upgrades required off-site to facilitate the development, and describe any arrangements to ensure that the upgrades will be implemented in a timely manner and maintained	Refer to **Section 6.1.11** and **Appendix 15** of this EIS.
▪ an infrastructure delivery and staging plan, including a description of how infrastructure on and off-site will be co-ordinated and funded to ensure it is in place prior to the commencement of construction	Refer to **Section 6.1.11** and **Appendix 15** of this EIS.

TABLE 3: HOW THE SEARS HAVE BEEN SATISFIED	
Requirements	**Satisfied by**
▪ an assessment of the impacts of the development on existing utility infrastructure and service provider assets surrounding the site, including the adjacent Warragamba Pipelines' corridor, and a description of how any potential impacts would be avoided and minimised	Refer to **Section 6.1.11** and **Appendix 15** of this EIS.
12. Fire and incident management	
▪ identification of the aggregate quantities of combustible waste products to be stockpiled at any one time	Refer to **Section 6.1.12** and **Appendix 25** of this EIS.
▪ technical information on the environmental protection equipment to be installed on the premises such as air, water and noise controls, spill clean-up equipment and fire (including location of fire hydrants and water flow rates at the hydrant) management and containment measures	Refer to **Section 6.1.12** and **Appendix 18** of this EIS.
▪ details regarding the fire hydrant system and its minimum water supply capabilities appropriate to the site's largest stockpile fire load	Refer to **Section 6.1.12** and **Appendix 20** of this EIS.
▪ detailed information relating to the proposed structures addressing relevant levels of compliance with Volume One of the National Construction Code (NCC)	Refer to **Section 6.1.12** and **Appendix 20** and **Appendix 21** of this EIS.
13. Hazard and Risk	
▪ including a preliminary risk screening completed in accordance with State Environmental Planning Policy No. 33 – Hazardous and Offensive Development and Applying SEPP 33 (DoP, 2011), with a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the development. Should preliminary screening indicate that the project is "potentially hazardous" a Preliminary Hazard Analysis (PHA) must be prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis (DoP, 2011) and Multi-Level Risk Assessment (DoP, 2011)	Refer to **Section 4.3.8**, **Section 6.1.13** and **Appendix 18** of this EIS.
14. Bushfire and incident management	
▪ assess the level of hazard posed to future development on adjacent land and how the hazards may change as a result of development	Refer to **Section 6.1.14** and **Appendix 13** of this EIS.
▪ address the requirements of Planning for Bush Fire Protection 2019 (RFS), in particular the provision of access (including perimeter roads) and water supply for firefighting purposes	Refer to **Section 6.1.14** and **Appendix 13** of this EIS.
15. Ecologically sustainable development	
▪ a description of how the proposal will incorporate the principles of ecologically sustainable development into the design, construction and ongoing operation of the warehouse and the associated office space	Refer to **Section 6.1.15** and **Appendix 24** of this EIS.
▪ consideration of the use of green walls, green roofs and/or cool roofs in the design of the development	Refer to **Section 6.1.15** and **Appendix 24** of this EIS.
▪ a description of the measures to be implemented to minimise consumption of resources, especially energy and water	Refer to **Section 6.1.15** and **Appendix 24** of this EIS.
16. Biodiversity	
▪ including an assessment of the proposal's biodiversity impacts in accordance with the Biodiversity Conservation	Refer to **Section 6.1.16** and **Appendix 12** of this EIS.

TABLE 3: HOW THE SEARS HAVE BEEN SATISFIED	
Requirements	**Satisfied by**
Act 2016, including the preparation of a Biodiversity Development Assessment Report (BDAR) where required under the Act, except where a waiver for preparation of a BDAR has been granted	
17. Planning agreement/development contributions	
▪ demonstration that satisfactory arrangements have been or would be made to provide, or contribute to the provision of, necessary local and regional infrastructure required to support the development	Refer to **Section 6.1.17** of this EIS.
Consultation	
During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners.	Refer to **PART E** of this EIS.
In particular you must consult with: ▪ Penrith City Council ▪ Environment Protection Authority ▪ Environment, Energy and Science Group ▪ Transport for NSW ▪ NSW Fire and Rescue ▪ Sydney Water ▪ Department of Primary Industries: Food Authority ▪ WaterNSW ▪ surrounding local landowners and stakeholders ▪ any other public transport, utilities or community service providers	Refer to **PART E** of this EIS.
The EIS must describe the consultation process and the issues raised, and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.	Refer to **PART E** of this EIS.

PART B SITE ANALYSIS

2.1 SITE LOCATION & EXISTING SITE CHARACTERISTICS

The identified portion of land, that is the subject of this EIS is defined as 2 and 14 Distribution Drive, Orchard Hills, being Lot 10 and 11 DP 271141 (previously known as 657-769 Mamre Road, Kemps Creek).

The subject site comprises a total area of approximately 104,323m^2, with the following split:

- Lot 10 (proposed facility): 51,711m^2
- Lot 11 (existing facility): 52,612m^2

The subject site forms part of the "First Estate Precinct", which comprises the southern portion of a larger precinct referred to as the Mamre West Land Investigation Area, located in Precinct 13 of the WSEA.

In its existing state, the subject site contains the newly constructed SBA warehouse and distribution facility over Lot 11, which features a 37m tall high bay area. The northern portion of the subject site is undeveloped and accessible via Distribution Drive.

An overview of site characteristics are included in **TABLE 4**, as follows.

TABLE 4: SITE CHARACTERISTICS	
Component	**Description**
Address and legal description	Lot 10 and 11 DP 271141, described as 2 and 14 Distribution Drive, Orchard Hills.
Site area	104,323m^2 (approx.) combined
Current use	The use relating to 2 Distribution Drive, Orchard Hills, consists of a warehouse and distribution facility with a high bay warehousing component, operated by SBA. The current site operations involve the storage and distribution of packaged snack food goods. 2 Distribution Drive, Orchard Hills, operates under SSD-9429. 14 Distribution Drive, Orchard Hills, is a vacant site within the First Estate Precinct, directly adjoining the existing SBA warehouse and distribution facility. Vegetation clearing and major earthworks have already been undertaken at the subject site, as part of the First Estate Precinct works of SSD-7173.
Topography	The surface of the site is generally flat, resulting from works carried out under SSD-7173.
Access	Vehicular access to the subject site is via Distribution Drive via five (5) separate crossovers. The two (2) existing access points to Lot 11 (to the south of the site) will be maintained with an additional three (3) crossovers to the Lot 10 proposed (to the north-west of the site).
Vegetation	The subject site contains only low lying/non established vegetation.
Watercourses	The nearest mapped watercourse is South Creek, located approximately 750 west of the subject site. An overland flow swale wraps around the subject site from east to north, extending through to South Creek.
Easements and encumbrances	A number of easements and encumbrances are registered on the property titles, including: ▪ Easement to drain water ▪ Right of access (temporary turning) ▪ Easement for emergency access ▪ Easement for water supply purposes ▪ Easement for sewerage purposes ▪ Easement for drainage of water ▪ Easement for underground cables

TABLE 4: SITE CHARACTERISTICS	
Component	**Description**
	Further details are included in **Section 2.4** of this EIS.
Heritage	The subject site is not identified as containing an item of heritage or being within a heritage conservation area.

The location of the subject site and existing site development are depicted in **Figure 3** and **Figure 4**.

2.1.1 2 Distribution Drive, Orchard Hills

2 Distribution Drive, Orchard Hills, hosts the recently constructed SBA warehouse and distribution facility, including a 37m tall high bay area. The operation of 2 Distribution Drive, Orchard Hills, includes the storage of approximately 50,000 pallets of packaged goods in an automated warehouse. The packed goods include potato and corn-based snack foods, which are manufactured in Smithfield and Blacktown, before being distributed to Orchard Hills for storage. The packaged goods are then distributed from Orchard Hills via B-double vehicles to grocery and supermarket retailers, including Coles and Woolworths.

2 Distribution Drive, Orchard Hills, operates under SSD-9429, as described in **Section 2.2** below.

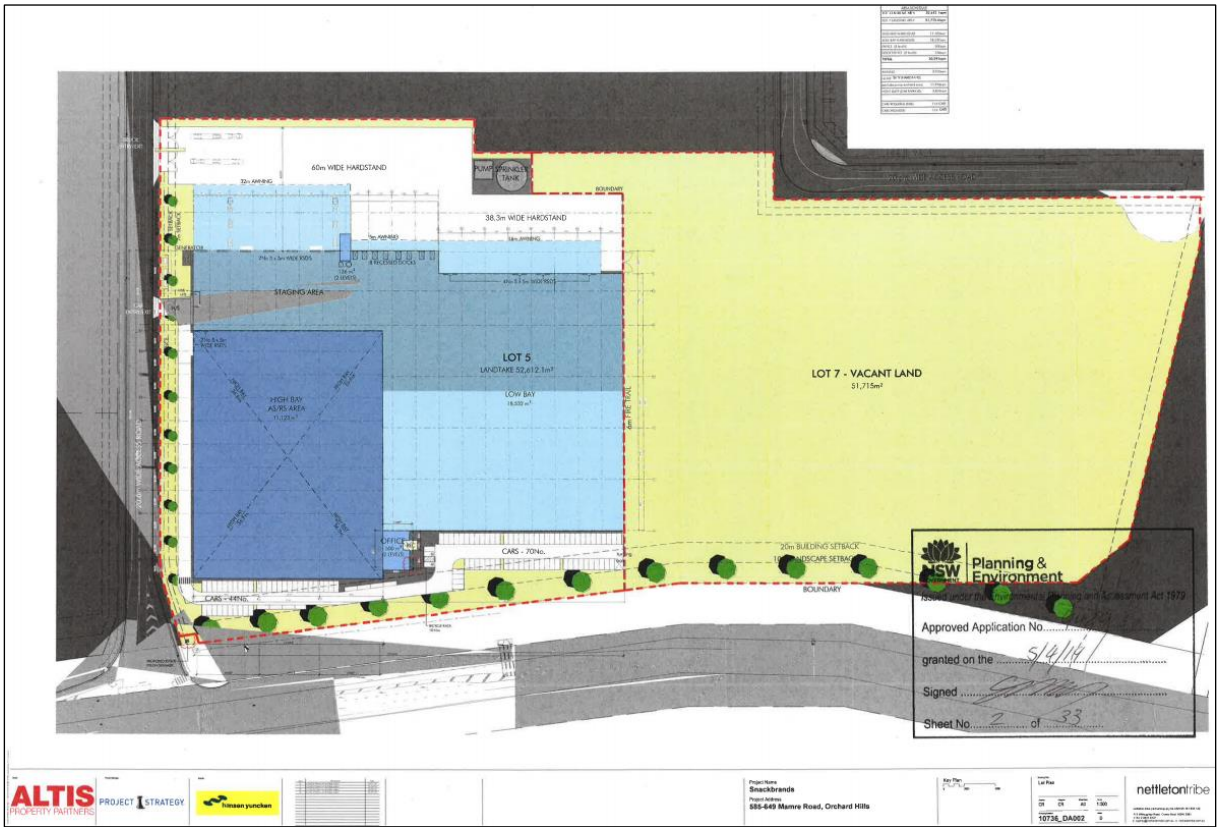


Figure 2 **SSD-9429 Approved Site Plan** (Source: NSW DPIE, 2019)

2.1.2 14 Distribution Drive, Orchard Hills

14 Distribution Drive, Orchard Hills, is vacant land located directly to the north of 2 Distribution Drive, Orchard Hills. In its existing state, the land is cleared, mostly unsealed and vacant with evidence of filling and levelling activities across the extent of the site. A dam is located in the north-western portion of 14 Distribution Drive, Orchard Hills.

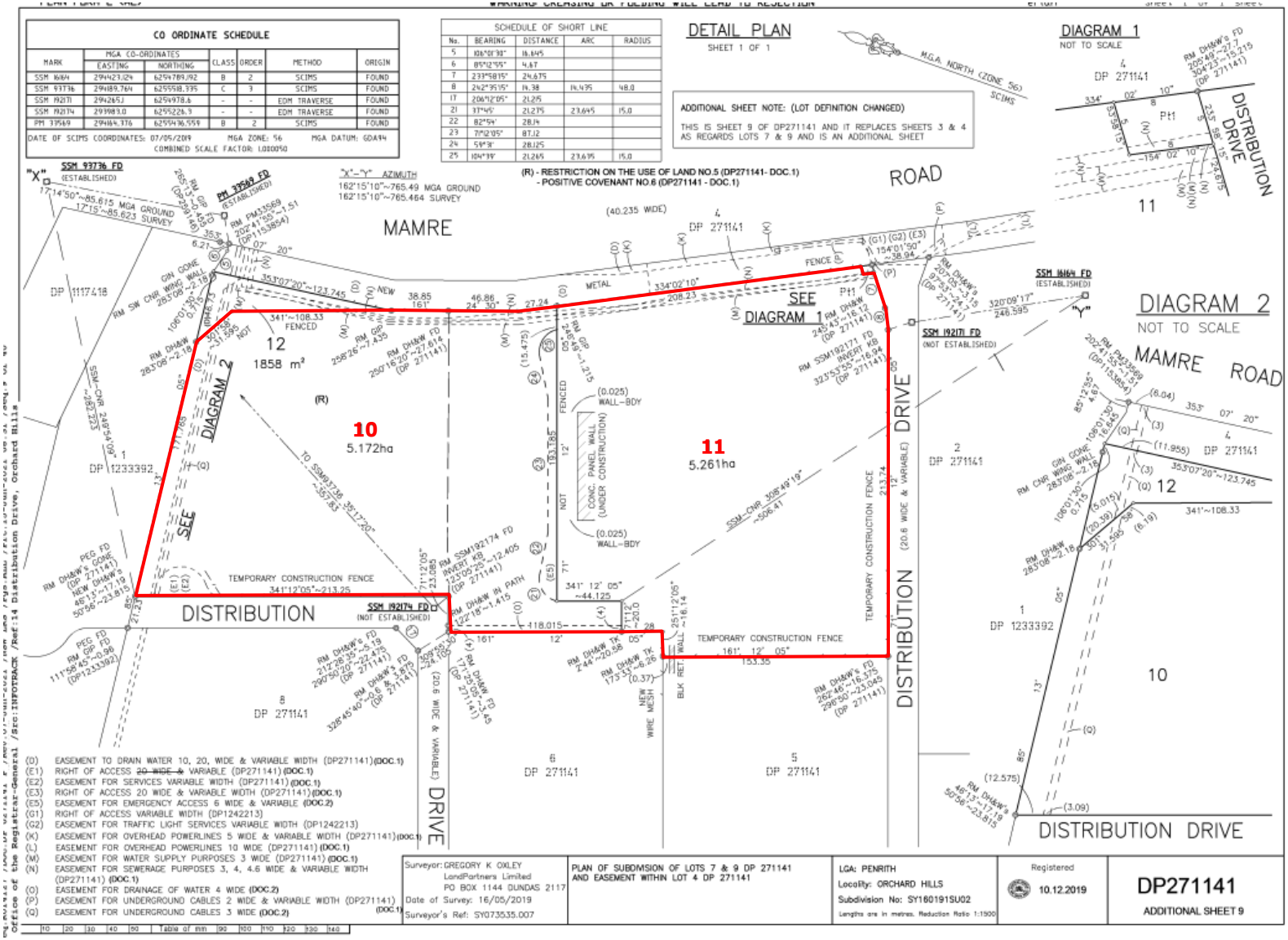


Figure 3 **Cadastral Map** (Source: InfoTrack, 2019)

Figure 4 **Aerial Map** (Source: Nearmap, 2021)

2.2 LAND OWNERSHIP

The land that is the subject of this application, is owned by the following entities:

- Lot 10 DP271141 – Snack Brands Industries Pty Ltd
- Lot 11 DP271141 – The Trust Company (Australia) Limited

Given the differing entity ownerships, the two land parcels will need to remain on separate titles. It is noted that the inter-allotment operations can achieve BCA compliance, as demonstrated in **Section 6.1.12** of this EIS.

Land owners consent has been obtained from both entities.

2.3 DEVELOPMENT HISTORY

Other development approvals that relate to the subject site are identified below.

SSD-7173 – Altis Warehouse and Logistics Hub

- On 15 December 2016, development consent was granted by the then Executive Director, Key Sites and Industry Assessments, for the construction and operation of a warehouse and logistics hub (SSD 7173). The development consent permits the following works:
  - subdivision of the site into 10 lots;
  - construction of three warehousing buildings between 9,400m^2 to 41,500m^2 and ancillary offices;
  - 357 car parking spaces;
  - minor earthworks, infrastructure and services;
  - internal access road from Mamre Road to the northern site boundary;
  - intersection works between Mamre Road and an internal estate road.
- SSD-7173 has been modified on several occasions:
  - amended site layout on Lot 8 and tenant specific fit-out of Linfox on Lot 8A, including Dangerous Goods storage, and N&A Fruit operation on Lot 8B1;
  - amendments to the internal road and subdivision layout to amalgamate lots 4, 5 and 6 into one lot, and reduce the number of lots from 10 to nine;
  - amendments to proposed drainage channel;
  - construction and operation of two warehouse facilities;
  - amendment to the subdivision plan to create new lots 10, 11 and 12 in place of approved lots 7 and 9;
  - amendment to the subdivision plan to subdivide Lot 8 into two new allotments (lots 13 & 14);
  - amendment to the subdivision plan to subdivide Lot 14 into two new allotments (lots 15 & 16);
  - amendment to the subdivision layout to further subdivide Lot 16 into two new lots (lots 17 & 18).

SSD-9429 – Snack Brands Warehouse and Distribution Facility

- On 5 April 2019, development consent was granted, by the Minister for Planning, for the construction and operation of a warehouse and distribution facility comprising of the following:
  - a high-bay warehouse and distribution centre with a total gross floor area of 30,255m^2;
  - 114 car parking spaces; and
  - minor earthworks to existing building pad.

The current precinct context is depicted in **Figure 5**.

Figure 5 **Surrounding Development Context** (Source: Nearmap, 2021)

2.4 EASEMENTS AND ENCUMBRANCES

The encumbrances noted within the Certificate of Title and Deposited Plan (DP) for each lot are summarised in **TABLE 5**, and a copy of the relevant documents included in **Appendix 3.**

TABLE 5: ENCUMBRANCES ON TITLE	
Type and Reference	**Description and Location**
Lot 10 DP271141	
-	Reservations and conditions in the crown grant(s)
-	Interests recorded on register folio 1/271141
-	Attention is directed to the management statement of the community scheme filed with the community plan
DP1013539	Restriction(s) on the use of land referred to and numbered (1) in the s.88B Instrument
DP1013539	Restriction(s) on the use of land referred to and numbered (2) in the s.88B Instrument
DP1013539	Restriction(s) on the use of land referred to and numbered (10) in the s.88B Instrument
DP1013539	Restriction(s) on the use of land referred to and numbered (11) in the s.88B Instrument

TABLE 5: ENCUMBRANCES ON TITLE	
Type and Reference	**Description and Location**
DP1153854	Right of carriageway variable width appurtenant to the land above described
AK807510	Planning agreement pursuant to section 7.6 Environmental Planning and Assessment Act 1979
DP271141	Easement to drain water 10 & 20 metre(s) wide and variable affecting the part(s) shown so burdened in the title diagram (doc.1)
DP271141	Easement for water supply purposes 3 metre(s) wide affecting the part(s) shown so burdened in the title diagram (doc.1)
DP271141	Restriction(s) on the use of land referred to and numbered (5) in the s.88B Instrument affecting the part shown so burdened in the title diagram (doc.1)
DP271141	Positive covenant referred to and numbered (6) in the s.88B Instrument affecting the part shown so burdened in the title diagram (doc.1)
DP271141	Easement for sewerage purposes 3, 4 & 4.6 metre(s) wide and variable affecting the part(s) shown so burdened in the title diagram (doc.1)
DP271141	Easement for services variable width affecting the part(s) shown so burdened in the title diagram (doc.1)
DP271141	Right of access variable width affecting the part(s) shown so burdened in the title diagram (doc.1)
DP271141	Easement for emergency access 6 metre(s) wide and variable affecting the part(s) shown so burdened in the title diagram (doc.2)
AP950248	Variation of easement DP271141 terms varied
DP271141	Easement for drainage of water 4 metre(s) wide affecting the part(s) shown so burdened in the title diagram (doc.2)
DP271141	Easement for underground cables 3 metre(s) wide affecting the part(s) shown so burdened in the title diagram (doc.2)
Lot 11 DP271141	
-	Reservations and conditions in the crown grant(s)
-	Interests recorded on register folio 1/271141
-	Attention is directed to the management statement of the community scheme filed with the community plan
DP1013539	Restriction(s) on the use of land referred to and numbered (1) in the s.88B Instrument
DP1013539	Restriction(s) on the use of land referred to and numbered (2) in the s.88B Instrument
DP1013539	Restriction(s) on the use of land referred to and numbered (10) in the s.88B Instrument
DP1013539	Restriction(s) on the use of land referred to and numbered (11) in the s.88B Instrument
DP1153854	Right of carriageway variable width appurtenant to the land above described
AK134990	Caveat by Mandalong Investments Pty Ltd
AK807510	Planning agreement pursuant to section 7.6 Environmental Planning and Assessment Act 1979
AM665631	Mortgage to National Australia Bank Limited
DP271141	Easement for water supply purposes 3 metre(s) wide affecting the part(s) shown so burdened in the title diagram (doc.1)
DP271141	Easement for sewerage purposes 3, 4 & 4.6 metre(s) wide and variable affecting the part(s) shown so burdened in the title diagram (doc.1)

TABLE 5: ENCUMBRANCES ON TITLE	
Type and Reference	**Description and Location**
DP271141	Easement for emergency access 6 metre(s) wide and variable affecting the part(s) shown so burdened in the title diagram (doc.2)
AQ252129	Mortgage to National Australia Bank Limited
AQ899706	Lease to Snack Brands Industries Pty Ltd expires: 13/2/2040. Option of renewal: 10 years and four further options of 5 years.

The proposed development has been designed in accordance with the abovementioned easements and encumbrances.

2.5 SITE CONTEXT

The subject site is located within the First Estate industrial precinct, located 40 kilometers west of Sydney's central business district (CBD). It is 7km from the M7 Motorway and 4km from the M4. The precinct is already a major economic foundation for the Western Sydney Employment Area (WSEA), with numerous commercial, bulky goods retailing and industrial developments emerging in the locality. First Estate comprises the southern portion of a larger precinct referred to as the Mamre West Land Investigation Area, located in Precinct 13 of the WSEA. To the south of First Estate, the Mamre Road Precinct was rezoned in June 2020 and encompasses an area of 850 hectares of industrial land.

To the east of Mamre Road is Erskine Business Park, which contains various warehousing, logistics and industrial facilities that operate on a 24/7 basis, including the likes of CSR and Woolworths. Located 2 km to the south-east is Mamre Anglican School, Emmaus Catholic College and the Catholic Healthcare retirement living community. South of First Estate, separated by the Water NSW Trunk Pipeline, is the recently approved 'Kemps Creek Warehouse, Logistics and Industrial Facilities Hub – SSD-9522'.

To the north along Mamre Road is the RU2 Rural Landscape land zoned under Penrith LEP, comprising of existing rural residential dwellings. It is understood that the owners of properties along Mandalong Close have been in discussion with the NSW DIPE over potential inclusion in the WSEA. In the future, if industrial provisions for these lands are adopted by the WSEA SEPP, Mandalong Close could be redeveloped for IN1 or IN2 uses.

Generally, the broader context of the subject site is typified by employment-generating land uses and rural areas. The employment generating land uses are predominately located along the enterprise corridor of Mamre Road and the industrial zone, in which the subject site is located. A visual representation of the surrounding land is included in **Figure 1**. **Figure 6** and **Figure 7** demonstrate the context of the current site conditions from Mamre Road.

Figure 6 **Street view looking north-west from Mamre Road towards subject site** (Source: Google, 2020)

Figure 7 **Street view looking west from Mamre Road towards subject site** (Source: Google, 2020)

2.6 SITE SUITABILITY

The subject site is located within an establishing industrial area and is zoned IN1 General Industrial under WSEA SEPP. The proposed development would facilitate the use of the subject site for industry, which is consistent with the zoning and the surrounding context. The subject site, within an industrial area and proximity to major arterial roads, serves as being ideal for manufacturing and distribution purposes.

Accordingly, the subject site is considered suitable for the proposed development and is consistent with the aims and objectives of the IN1 General Industrial zone, in that it seeks to facilitate future employment generating industrial development that responds to the characteristics of the land and is compatible with surrounding land uses.

The subject site is suitable for the size and scale of the development proposed and represents a quality outcome for otherwise unutilised industrial land.

In summary, the subject site is highly-suited to accommodate the intended new development based on the following factors:

- WSEA SEPP allows for the proposed development as a permissible use;
- The site is readily accessible via the regional road network;
- The proposed development is compatible with surrounding development and local context;
- The subject site can be serviced immediately and at no cost to Government;
- The proposed development causes minimal impact on the environment;
- The site will complement functions of the wider Mamre Road area; and
- The proposed built form is designed to mitigate any impacts on surrounding properties.

The following key elements of the site and proposed development are noted:

2.6.1 Visual Impact

The proposed development is expected to create some visual impacts for receptors in close proximity to the site. However, the significance of these impacts is either low or negligible, due to the fact the proposal is located against the backdrop of the existing SBA high bay and other industrial development located within the immediate surround context.

Properties to the north of the subject site will receive views of the development. However, the majority of these views are expected to be limited by either existing vegetation or the resultant visual impacts

not judged to be significant due to the proposed development only affecting a small proportion of the view. Therefore, the proposed view would be very similar to the existing baseline view.

The change in view is judged to be slightly larger from locations along Mamre Road at close range, such as the cycleway or roadway. The same statement can be applied to Distribution Drive within First Estate. However, the sensitivity of these locations is judged to be low due the presence of large scale industrial development within the immediate surrounding context and the type of users at these locations.

The Visual Impact Assessment, prepared by Geoscapes (**Appendix 8**), presents a series of photomontages that demonstrate that the proposed landscape planting at the development site, can be effective in screening to reduce visual impacts for a number of sensitive close-range properties. This will be most effective after 15 years and for those receptors who experience direct views at close to medium range.

2.6.2 Noise and Vibration

Renzo Tonin has carried out an Noise Emission Assessment (**Appendix 23**) to support the proposed development, through which they have quantified operational noise emission from the proposed development and assessed noise at the nearest sensitive receivers. Based on the assumptions and inputs within this report, it has been established that operation of the site is capable of complying with relevant EPA and Council noise emission requirements.

Further details are contained within **Section 6.1.4** of this EIS.

2.6.3 Air quality and Odour

Northstar Air Quality have undertaken an Air Quality Impact Assessment (AQIA) (**Appendix 22**), in addition to an Air Quality and Odour Risk Assessment (AQRA) to provide a quantitative dispersion modelling assessment to predict the anticipated emissions from the operation of the proposal, as required by the SEARs.

The AQIA has been performed using process-specific emissions measured at existing operations at the SBA Smithfield and Blacktown facilities and applied to the proposed activities at the subject site and uses a dispersion modelling assessment to predict off site impacts of emissions from the commercial kitchen, gas-fired boilers, and wastewater treatment plant.

The AQIA does not predict any non-compliance (exceedance) of the relevant impact assessment criteria at any identified receptor location.

A range of management and control measures have been recommended including an emissions monitoring program to measure emissions at the proposed Orchard Hills site within three months of operating, and also the implementation of a series of additional controls to offer effective air quality management.

Further details are contained within **Section 6.1.5** of this EIS.

2.6.4 Transport and Traffic

The proposal generally refers to amendments to the existing development at Lot 11 and construction of a new industrial building at Lot 10. It is emphasised that ultimately, these two Lots will operate in conjunction, and they will be tenanted to SBA as a whole. Accordingly, for assessment conservativeness, the assessment has been undertaken based on the operation of Lot 10 and 11 as an overall development.

The site is proposed to be accessed to / from Distribution Drive via the intersection of Mamre Road and Distribution Drive. In the future, primary access to the First Estate Precinct, of which Lot 10 and Lot 11 forms a part of, is to be provided via the existing signalised T-intersection of Mamre Road with James Erskine Drive and secondary access is to be provided via a left-in / left-out priority controlled intersection with Mamre Road located approximately 500 metres south of the James Erskine Drive intersection.

Noting the approved traffic generation thresholds for Lot 10 and Lot 11 under the approved First Estate Master Plan (SSD-7173) is 84 trips/hr and 87 trips/hr during morning and evening peak hours separately and 1,186 trips per day. As per **Section 6.1.6** of this EIS, the forecast traffic generation would represent

an increase over the abovementioned threshold by 11 trips/hr during evening peak hour, which is considered a minor departure from the original approval. The proposed development (inclusive of the existing Lot 11 development), during normal operational period, is expected to generate in the order of 84 trips/hr and 98 trips/hr during the morning and evening peak hour periods, and 1,120 trips per day, which is consistent with the approved SSD-7173 threshold during the morning peak and marginally higher by 11 trips/hr during the evening peak.

In referring to the assessment by First-Principles, the increases of this magnitude are considered minimal in the overall scheme and expected to have negligible impacts to the surrounding road network.

The development traffic is above the approved thresholds by minor amounts such that it would be equivalent to increases of approximately 1 vehicle every 6 minutes during evening peak hours.

Previous modelling as part of the planning for the overall First Estate Precinct concluded that the interim access arrangements to Mamre Road (prior to the upgrade of Mamre Road and James Erskine Drive to four legs) will operate with a Level of Service B during both peak periods – considered good operation in accordance with TfNSW approved intersection performance criteria.

On the basis of the above, it is anticipated that the road network would be more than adequate to cater for the traffic generated by the proposal. Accordingly, it is considered that no further road upgrades are required to support the proposed development. Ason Group have determined that there is sufficient spare capacity within the existing and planned intersection designs to accommodate the traffic volumes generated by the proposal without causing any adverse impacts to the road network operations.

In summary, Ason Group have concluded that the proposal is supportable on traffic and transport planning grounds and is not expected to result in any adverse impacts on the surrounding road network or the availability of on-street parking environment.

2.6.5 Flooding

The subject site is not affected by mainstream flooding. Detailed flood modelling for the entire subdivision was undertaken by Costin Roe Consulting Engineers, which accompanied the application for SSD-7173. The Costin Roe Consulting Engineers Flood Report shows that the subject site is outside of the flood extent. The flood level for the 1% AEP flood event adjacent to the site has been determined to be approximately 32.50 AHD. The proposed finished floor level (FFL) of the proposed manufacturing facility is 36.75 AHD, with the lowest part of the site at approximately 34.60 AHD.

2.6.6 Comparison against SSD-9429

The proposed development consists of an industrial facility, adjacent to the recently constructed warehouse facility of SSD-9429. The proposed development would be operated by SBA, concurrently with the neighbouring site.

The following table provides a comparison of development parameters reflected in SSD-9429 and those proposed as part of this application.

TABLE 6: COMPARATIVE DEVELOPMENT PARAMETERS

Development Parameter	SSD-9429	Proposed SSD (consolidated operations*)
Total employment numbers	87 personnel	415 personnel
Site area	52,610m^2	104,327m^2
Gross floor area	30,255m^2	57,676m^2
Car parking	114 spaces	274 spaces
Predicted traffic numbers	41 vehicles per hour during the AM peak and 42 vehicles per hour	84 vehicles per hour during the AM peak and 98 vehicles per hour

	during the PM peak – total of 572 trips per day	during the PM peak – total of 1,120 trips per day
Hours of operation	24 hours per day, seven days per week	24 hours per day, seven days per week
* consolidated operations are inclusive of the existing warehouse (SSD-9429) and proposed manufacturing facility.		

The subject site's consistency with applicable regional and local strategies is demonstrated in the comprehensive environmental assessment, provided in **PART F** of this EIS, which includes an analysis of all potential impacts, which has been informed by the relevant consultant reports. Accordingly, the environmental assessment prescribes recommendations and mitigation measures (where necessary), to account for all identified potential impacts, by the proposed development. The suitability of the subject site with regard to the proposed development, can be attributed to its ready ability to provide employment, its excellent access arrangements, its suitable contextual setting, and its minimal impact on the environment.

Accordingly, the EIS prescribes recommendations and mitigation measures (where necessary), to account for all identified potential impacts, by the proposed development. The suitability of the subject site to cater for the proposed development, can be attributed to:

- its ability to provide employment,
- its excellent access arrangements,
- its suitable contextual setting, and
- its minimal impact on the environment.

PART C PROPOSED DEVELOPMENT

3.1 OBJECTIVES OF THE PROPOSAL

The aim of the proposed development is to provide a purpose-built food manufacturing facility, in line with Industry Best Practice, resulting in:

1. Generate employment – during construction and once the development is operational;
2. Improve access to jobs for residents of the immediate community and wider locality;
3. Supplement, support and compliment the WSEA;
4. Demonstrate architectural excellence, through its siting and design compatibility, with minimal visual impact; and
5. Provide suitable mitigation measures where required, to minimise any unforeseen impacts arising in the future.

3.2 DESCRIPTION OF THE PROPOSED DEVELOPMENT

Consent is sought to develop the subject site for an Industrial food manufacturing facility, in accordance with the following provisions.

TABLE 7: PROPOSED DEVELOPMENT PARTICULARS	
Project Element	**Development Particular**
Site Area	104,327m^2 (combined total)
General	The proposed development is considered SSD, pursuant to Schedule 1, Section 3 of SRD SEPP
Primary Land Use	Industry
Operation	Industrial food manufacturing facility with production capacity up to 50,000mT/year
Total GFA	57,676m^2 (27,385m^2 new)
Floor Space Ratio	0.55:1
Building Height	14.6m
Number of Stories	Two (2) stories
Landscaping	8,050m^2
Earthworks	Earthworks components are proposed as follows: ▪ 2,750m^3 of cut ▪ 33,082m^3 of fill
Car parking	274 spaces (160 new)
Infrastructure and Services	Refer to **Section 3.2.2** below
Machinery and Plant	Refer to **Section 3.2.4** below
CIV	$222,532,480.00 (exc. GST)
Construction Jobs	Approximately 497 direct construction jobs
Operational Jobs	Approximately 415 ongoing jobs (combined facility): ▪ 87 existing warehouse (SSD-9429) ▪ 328 proposed manufacturing

3.2.1 Demolition

To facilitate the proposed development, minor demolition works are proposed, including:

- Removal of one (1) recessed dock (RSD)
- Removal of existing precast panels from the northern warehouse wall
- Removal of existing fire trail

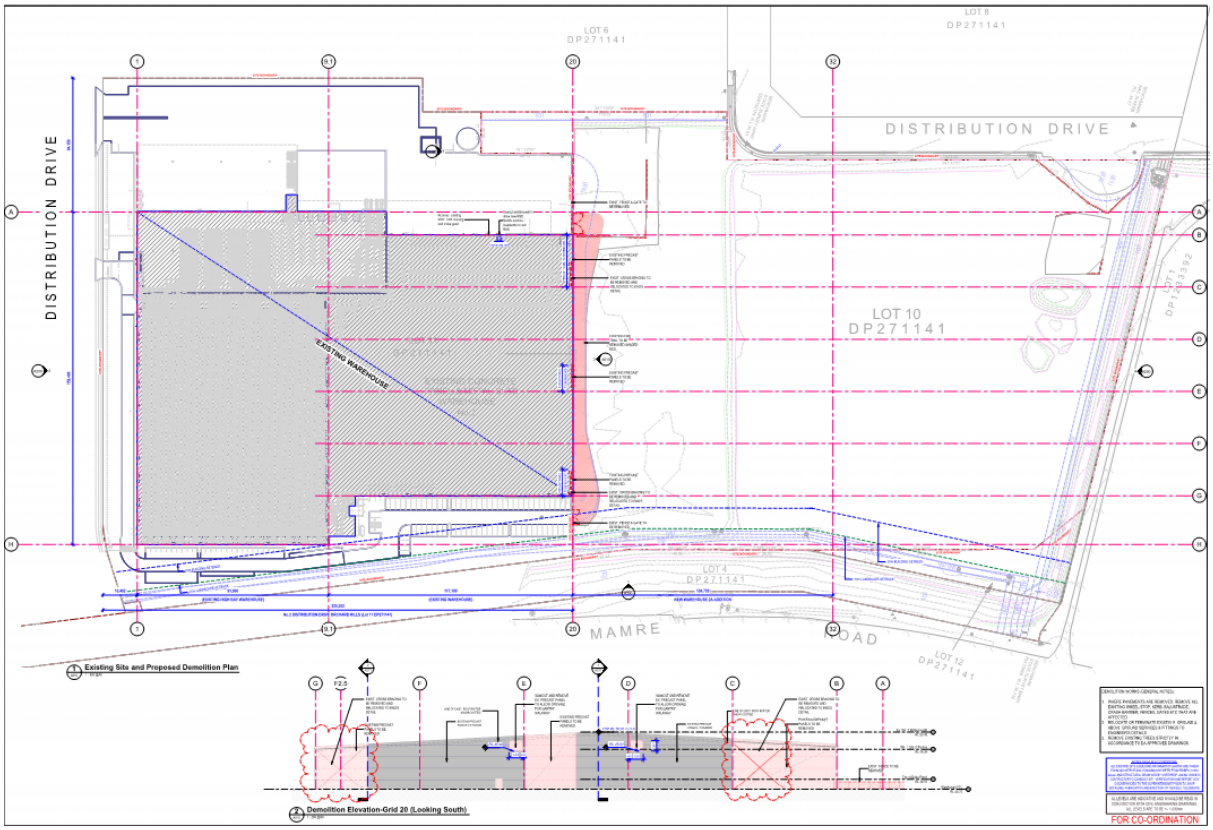


Figure 8 **Demolition Plan** (Source: HLA Architects, 2021)

3.2.2 Site Preparation

3.2.2.1 Earthworks

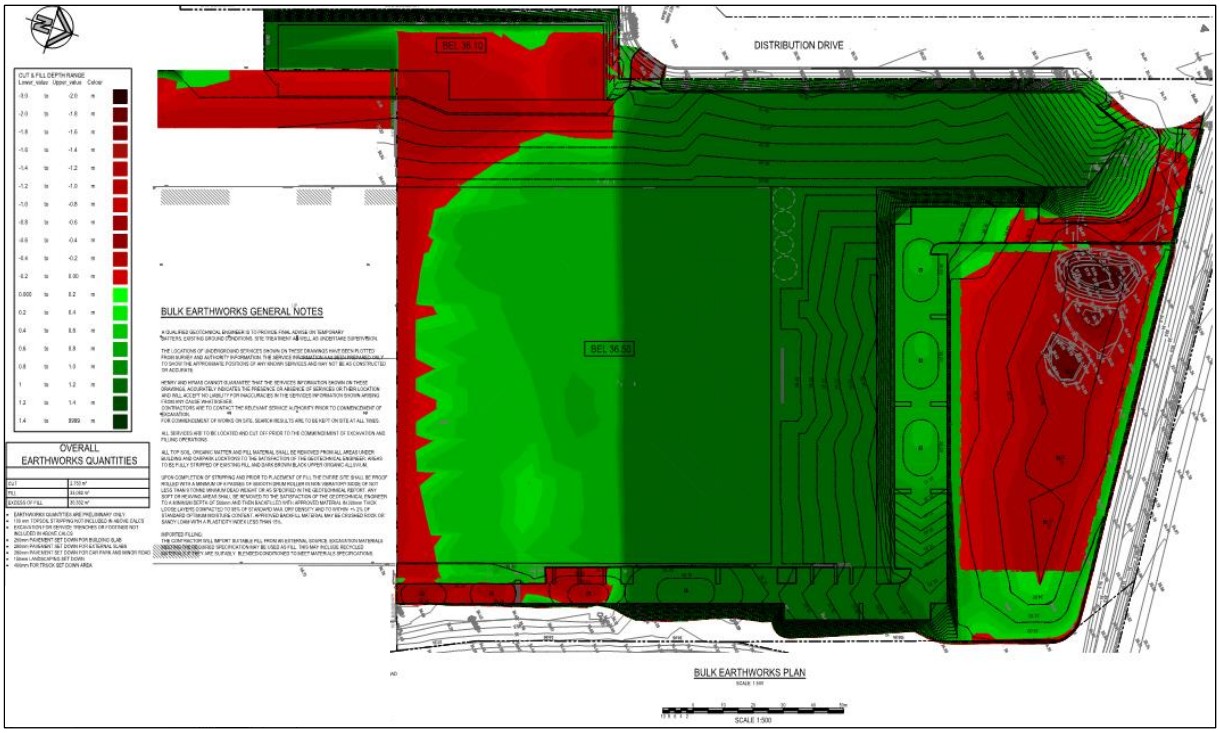


Figure 9 **Earthworks Plan** (Source: Henry & Hymas, 2021)

The overall earthworks quantities for the proposed development are as follows:

- Cut: 2,750m^3
- Fill: 33,082m^3
- Excess of Fill: 30,332m^3

3.2.2.2 Infrastructure

The following utility connections available/required for the proposed development.

Electrical Services – High Voltage (HV):

The high voltage connection point for the SBA development will be from the two switching stations locating within the site adjacent to the western boundary off Distribution Drive. These two switching stations represent the delineation of the private internal HV infrastructure to the Endeavour Energy assets.

Adjacent to the two Endeavour Energy owned switching station will be another switching station, which will be privately owned and maintained. This is the connection point for the high voltage ring main, which links up to the internal substations and main switchboard within the development.

There are significant upgrades required to the Endeavour Energy infrastructure in order to ensure the required power can be provided to the development site. Power will be supplied from Mamre Zone Substation (located off John Morphett Drive, Erskine Park) to the two (2) Endeavour Energy switching stations previously discussed.

To facilitate the works mentioned above, two (2) x 11kV feeders from the Zone Substation will be required to be installed along Lenore Drive, Erskine Park Road, Mamre Road and Distribution Drive. This route is approximately 3,240m long and requires the following:

- Approx. 1,000m of the route has spare conduits which can be used;
- Approx. 2,300m of Trenching/conduit installation is required;
- Approx. 9,080m of 300mm2 CU 3C Cable;
- Approx. 2,310m of 240mm2 CU 3C Cable;
- Two (2) new Switching Stations.

A private 11kV switching station will be provided beside the Endeavour 11kV switching station on the Distribution Drive boundary. The incoming power supply has been negotiated with Endeavour Energy. An internal 11kV ring main will be established from this switching station that will connect 7-off 1500kVA transformers in the first instance, with a space for one additional 1500kVA transformer. 5-off transformers will be located (under cover) on the roof of the building to serve the equipment within the building, one transformer will be located adjacent to the wastewater treatment plant to supply it and another will be located on the property boundary to serve the corn processing area. Each transformer will be provided with a Ring Main Unit to enable it to be turned off without affecting other transformers.

Each transformer will supply a dedicated main switchboard with associated automatic power factor correction equipment. Power factor will be retained above 0.9. Each main switchboard will supply general light and power as well as the processing plant equipment.

Lighting will be provided internally to comply with the relevant section of AS1680 and externally to comply with the relevant section of AS1158. External lighting will comply with AS4282 to ensure that there are no, or at least acceptable, obtrusive effects.

Telecommunications:

There are two (2) 100mm diameter and one (1) 50mm diameter telecommunications lead-in conduits proposed as a part of the development works. These conduits are proposed to be marked and capped at the Mamre Road property boundary, for future connection and extension by Telco. All infrastructure works within the road reserve are to be finalised by Telco.

Sewer Drainage:

Sydney Water has provided a plan depicting all water services surrounding the subject site. There is a 125mm Polyethylene sewer service within Mamre Road, as well as a pressure main with a boundary kit dedicated for the development stubbing in from Distribution Drive. The existing pressure sewerage system for the site was designed for approximately 800 EPs. The sewer demand for the site is estimated to be an average flow of 13.9 L/s (based off 80% of the water demand), which equates to approximately 10,000 EPs. Sydney Water has advised that the existing pressure sewerage system does not have sufficient capacity, and is therefore not an appropriate sewer connection point for the site. Similarly, the 125mm PE pipe within Mamre Road is not an appropriate sewerage connection.

As agreed in principle with Sydney Water, a new sewer gravity pipe will be required to connect to the existing Sydney Water DN600mm sewer main within Mamre Road. This proposed pipe will be approximately 950m in length.

Potable Water:

There is a 200mm Ductile Iron Cement Lined (DICL) service within Distribution Drive, as well as a 200mm DICL service on the far side of Mamre Road. The connection point for the potable and water services will be to the 200mm DICL service in Distribution Drive.

Sydney Water advises that the potable connection for the development will be into a future DN300 potable water main in Mamre Road (proposed to be designed and constructed by others). However, the hydraulic consultant from Sparks and Partners has advised that the proposed connection point for the site is instead the 200mm DICL service within Distribution Drive, as stated above.

There are no recycled water services available at or near the development site, therefore no recycled water connection will be proposed for the development.

Natural Gas:

There is a 110 NY 210 kPa medium pressure gas main along Mamre Road along the front of the property and a polyethylene 50 NY 210 kPa medium pressure gas main and 110 polyethylene 210 kPa medium pressure gas main on James Erskine Drive across from the development site.

As per discussions with Jemena, the proposed gas services for the development will not connect into any of the existing infrastructure, but will instead connect into a proposed 1000kPa dedicated gas main which is to be installed by Jemena.

Fire Hydrant System:

The building is required to be covered by a fire hydrant system throughout in accordance with National Construction Code (NCC) / Building Code of Australia (BCA) Volume 1 Section E1.3 and complying with AS 2419.1 – 2005. An existing hydrant system and hose reel system that was installed as a part of the previous stage has a direct feed water supply system from town main connection with a 150mm hydrant ring main around the building. This is to be extended around the proposed manufacturing development and has sufficient capacity to supply the fire hydrant system for the entire site.

Fire Sprinkler System:

Sprinkler protection for all areas of the existing warehouse is to be designed in accordance with FM Global Data Sheets and/or hydraulically proven to satisfy FM Global guidelines. The sprinkler design for areas of the existing building that are relevant to the new manufacturing extension are as follows.

- Low bay warehouse – 12 x K22 (K320 metric) @ 350 kPa
- Low bay awning – 12 mm/min over 230 m2 (HC-3)
- Dock offices – 4 mm/min over 140 m2 (HC-1)

The proposed fire sprinkler systems shall be supplied by the existing fire pumps and tanks available at site, refer to below:

- Existing tanks capacity – 540kL

- Existing pumps – two diesel duty and standby Pumps, one (1) pump is to FM Global and one pump appears to have been installed to AS 2941

The fire sprinkler system will be provided with five sprinkler control valve sets on the valve room located at the façade of the proposed new building.
A proposed water mist system shall have a separate pump to boost the ring main water supply.

Stormwater:

There is an existing ø900mm stormwater stub at the north-west corner of the site with an approximate invert level of IL32.40m. The stub connects into the existing stormwater within Distribution Drive. A proposed pit will be constructed over the existing stub at this location with a reduced level of RL 35.30m. There will be no need for on-site detention or on-site water quality treatment as there is a downstream detention structure and bio-retention basin that will address these issues respectively. The existing 900mm stormwater pipe has sufficient capacity to convey the post-developed flows from the development site.

There will be a 50kL underground rainwater tank in the eastern carpark for the purpose of maximising re-use and minimising potable use of rainwater. 2,930m^2 of the roof area will be directed towards the 50kL rainwater tank.

3.2.3 Built Form

Construction of the proposal would involve no substantive demolition activities but will comprise minor earthworks (cut and fill), building and construction of pavements and hardstand, and construction of a new warehouse and associated offices.

The built form component of the proposed development includes the construction of an industrial manufacturing facility (27,385m^2), which is to be located adjacent to (and will constitute an extension to) the existing warehouse at 2 Distribution Drive, Orchard Hills. The proposed development involves:

- Additional warehouse/manufacturing area (including mezzanines) of 24,572m^2
- Second stage addition of 2,813m^2
- Ancillary office area of 2,485m^2
- 160 car parking spaces
- Wastewater treatment plant of 2,155m^2
- Outdoor pallet storage area of 350m^2
- Hardstand area
- Ancillary infrastructure
- Complementary landscaping

The built-form component of the proposed development also includes earthworks and infrastructure, for which consent is sought.

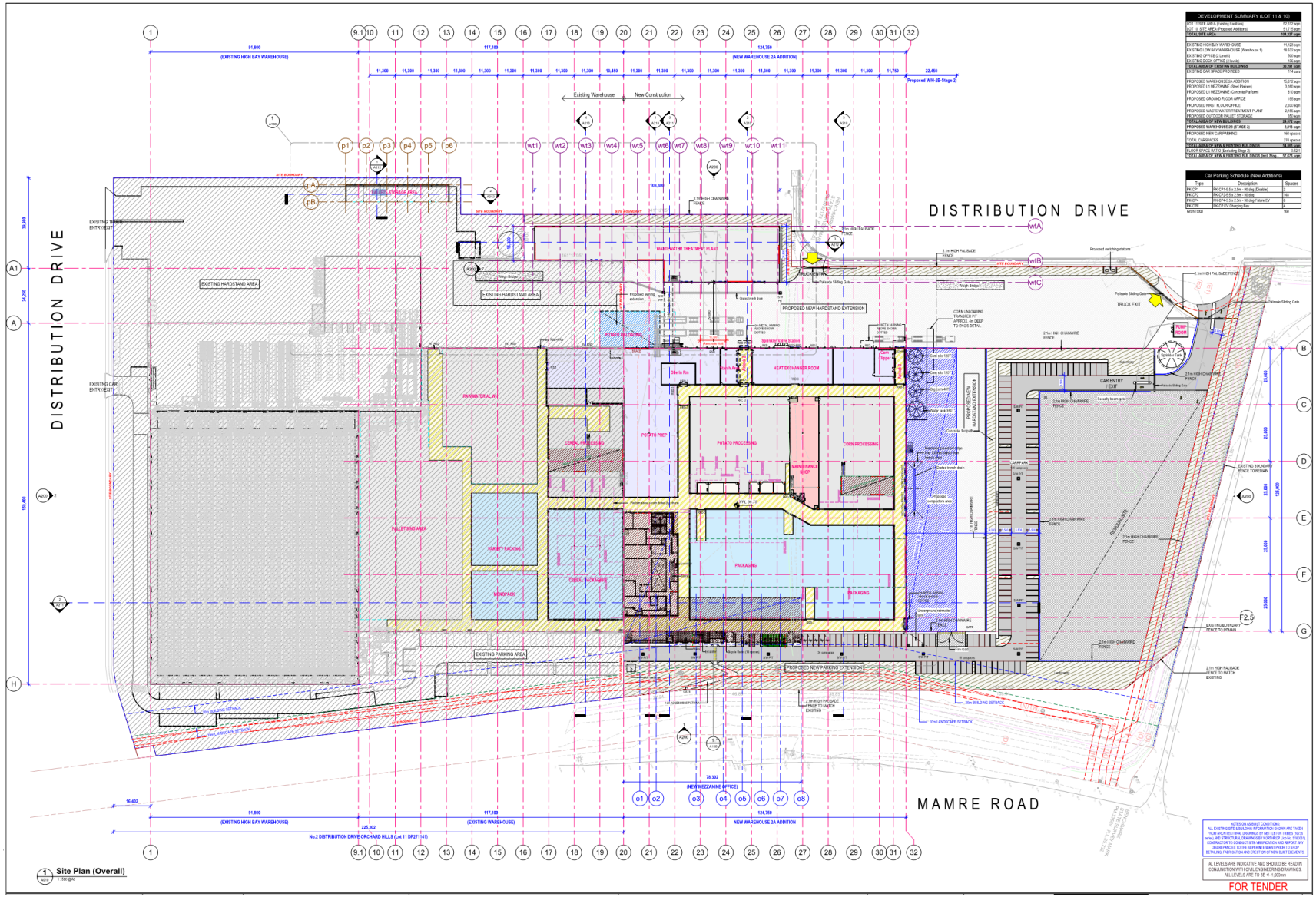


Figure 10 **Proposed Site Plan** (Source: HLA Architects, 2021)

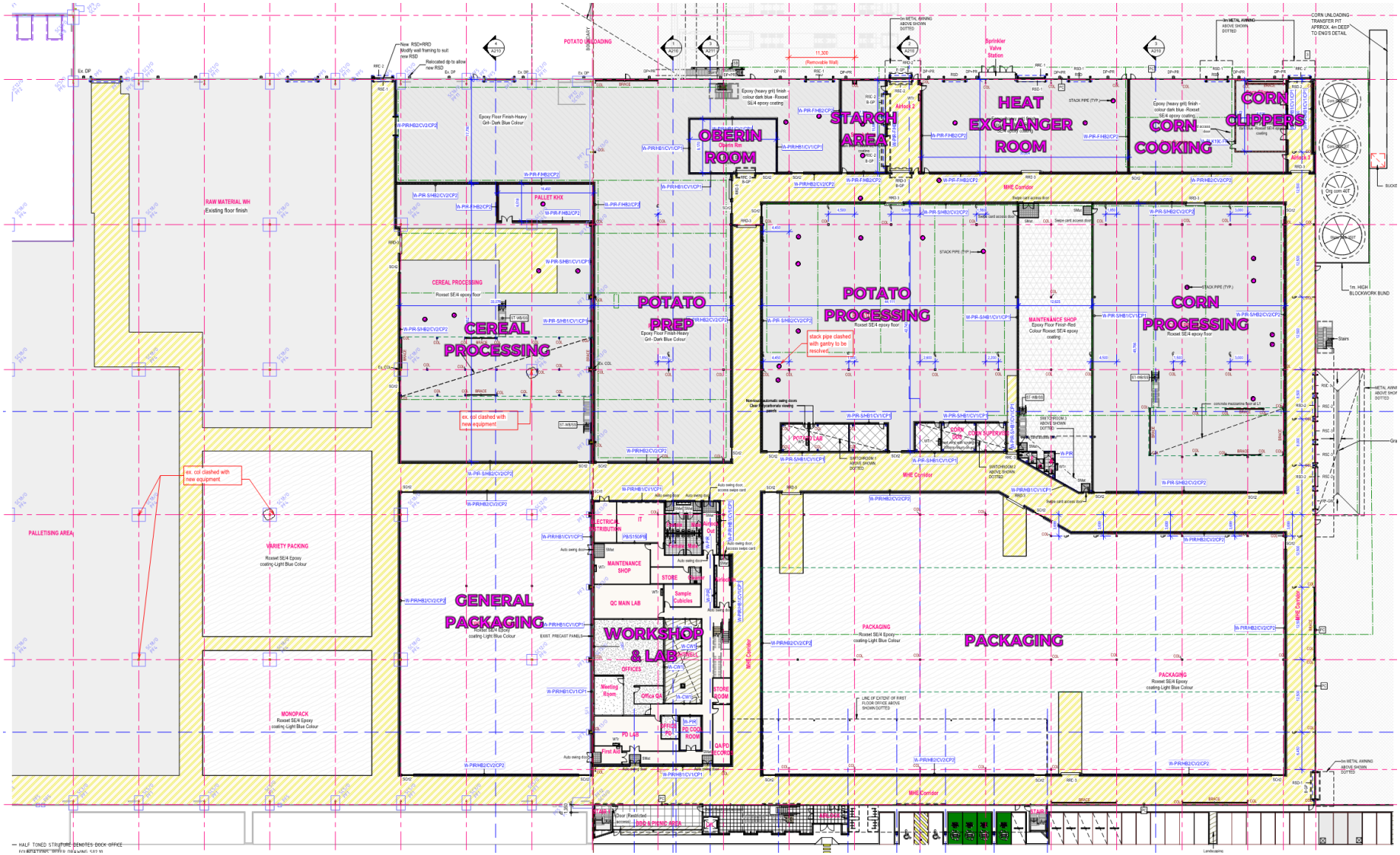


Figure 11 **Proposed Warehouse Ground Floor Plan** (Source: HLA Architects, 2021)

Figure 12 **Proposed Building Perspectives** (Source: Geoscapes, 2021)

The full package of Architectural Plans are included in **Appendix 5** of this EIS.

3.2.3.1 Height / Scale

The proposed development would be in keeping in terms of scale of nearby developments. The proposed height of the building is 14.6m. The ridge height sits at RL 51.35. However, with the allowance of plant and screening structures, the maximum height is 19.5m.

3.2.3.2 Colour / Materials & Finishes

Colours proposed for the facades of the building are typical of this type of development with more muted recessive tones applied, that will transition well from the existing SBA warehouse. 'Shale Grey' and 'Monument' paint finishes are used predominantly on the large expanses of the building, with timber finishes and 'Ironstone' and 'Light Metallic Grey' coloured cladding used to highlight areas around the office components.

High quality finishes have been proposed that will be most visible at close range. The eastern facade will be prominent to views from Mamre Road, however, following maturity proposed landscaping along the northern and eastern boundary, views will be softened through both facades.

3.2.3.3 Landscaping

To help mitigate and soften the building particularly from Mamre Road and receptors to the north, native species will be planted at regular intervals along the northern and eastern boundaries of 14 Distribution Drive, Orchard Hills – note, planting to the existing warehouse is to remain unchanged, as per SSD-9429 approval.

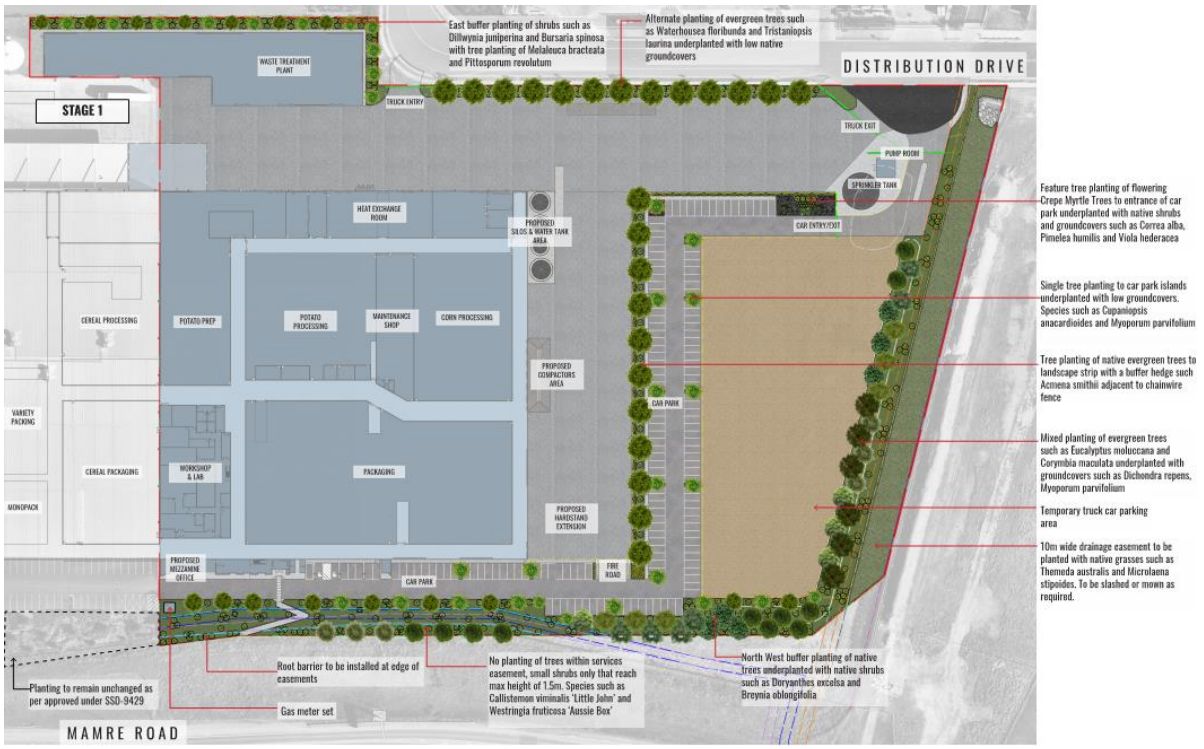


Figure 13 Proposed Landscape Plan (Source: Geoscapes, 2021)

Proposed landscaping includes:

- Buffer planting of native trees, underplanted with native shrubs, to the north-east
- Mixed planting of evergreen trees along the northern boundary
- Tree planting is excluded from services easements, where only small shrubs are proposed
- Native grasses are proposed for the 10m wide drainage easement along the northern boundary
- Alternate planting of evergreen trees along Distribution Drive, underplanted with low native groundcovers
- Buffer planting of shrubs, with tree planting of Melaleuca bracteate and Pittosporum revolutum to the west of the proposed waste water treatment plant

Landscape Plans, prepared by Geoscapes, are included in **Appendix 6** of this EIS.

3.2.4 Operational Details

Over the years, SBA has played a key role in overall market growth of snack products, leveraging its strategic relationships across both retail and wholesale trade, building brands, continually innovating, and driving overall sales from humble beginnings of 15 million packs per year, to its current day at over 200 million. Of course, to produce volumes of this magnitude, SBA also leverages an extensive network of Australian famers, sourcing 100% of its potato and corn requirement and continuing its proud history to provide all Australians with Australian grown and manufactured snacks.

This proposal seeks to develop an industrial food manufacturing facility adjacent to the existing SBA distribution centre at Orchard Hills. Currently SBA manufactures food products at two separate facilities located in Blacktown and Smithfield, before transporting the finished goods to Orchard Hills distribution centre for storage and later distribution. The proposed development seeks to consolidate the two existing manufacturing facilities into one new facility adjacent to the distribution centre.

The project seeks to reduce production costs through:

- Elimination of finish product shuttle
- Reduce loss of product
- Increase energy efficiency
- Reduced energy consumption

Current production volumes for SBA are over 36,000 mT per year, with the investment (as part of the proposed development) in capacity for growth to approximately 50,000 mT per year. This application seeks consent for production capacity up to 50,000 mT per year.

The proposed development involves the transfer of operations and the replacement of outdated equipment, including:

- Development and installation of a corn processing and packaging plant
- Development and installation of a potato processing and packaging plant
- Transfer and installation of a cereal processing and packaging plant
- Transfer and installation of associated end of line equipment and wastewater treatment plant

The food products that will be manufactured primarily comprise of potato, corn and extruded snack food products, sold under well-known brands such as Kettle, Thins, CC's, Cheezels, Jumpy's and The Natural Chip Company.

The proposed facility will comprise different areas for processing and packaging of snack foods, within a new purpose-built warehouse. A section of the existing low bay warehouse is to be converted for cereal processing and packaging and storage of raw material.

The food manufacturing activities at the subject site will operate process lines for the processing and packing of potato and corn products and is anticipated to include:

- Receival of raw materials (i.e. potatoes and corn);
- Storage and handling raw materials;
- Processing raw materials such as peeling and slicing;
- Cooking food products:
    - Potatoes will be cooked in an oil fryer;
    - Corn will be dried in an oven and then cooked in an oil fryer;
- Packaging and distributing the final product;
- Accumulating, storing and disposing of food wastes and food-preparation wastes; and
- Onsite wastewater treatment

The facility is proposed to operate 24 hours a day, seven days a week, in line with the existing operations of the SBA warehouse and distribution facility.

3.2.4.1 Staff

The maximum anticipated employee numbers on site at any one time is expected to be approximately 250 staff spread across the manufacturing, warehousing and front office operations.

TABLE 8: STAFF SHIFT NUMBERS[1]

Type	Day (5:00-15:00)	Afternoon (13:00-23:00)	Night (21:00-7:00)	Office (8:00-16:00)	Total
Warehouse	12	10	10	7	39
Corporate	0	0	0	32	32
Other	89 (94)	99 (106)	91 (96)	30 (40)	309 (336)
Total	101 (106)	109 (116)	101 (106)	69 (79)	380 (407)

Note: [1] Operational details during seasonal peak periods are provided in brackets

3.2.4.2 Customer and visitors

The site is designed to accommodate customer visits and tours; however, these visits are not regular and on as needs bases and are managed through normal business hours.

Visitors to the site are limited to auditors, suppliers of packaging material, raw material, equipment providers and contractors. Packaging material, raw material and equipment providers visitor are managed to normal business hours. Equipment contractors are managed through our maintenance operating system and are expected to be on site as per agreed schedules.

3.2.4.3 Deliveries and truck movements

The proposed development will enable the elimination of the shuttle transfer of finished products from the existing manufacturing facilities in Smithfield and Blacktown (approx. 4 trucks per hour) to the Orchard Hills warehouse and distribution centre. The deliveries of raw materials to the new proposed manufacturing facility will remain the same as the consolidated number to the existing sites (approx. 5 trucks per hour).

The remaining vehicle movements through the subject site are to accommodate the current warehouse operations, being 5 delivers or dispatches per hour and employees entering and exiting the site.

3.2.4.4 End product customers

Transfer of finished products to SBA end customers is achieved via a 3PL transport provider or retailer primary freight, with the site design to accommodate three (3) dispatch loads per hour.

Finished goods are distributed via the retail or wholesale trade with the retail trade accounting for approximately 90% of all vehicle movements.

3.2.4.5 Food production

The proposed operations constitute three (3) processes:

1. Potato based products which are similar for all potato base processes, except *Jumpy's*
2. Corn based products which are similar for all corn-based processes, such as *CC's* and *Nature Earth*
3. Extruded products which are similar for all cereal based processes, such as *Cheezels* and *Chickadee's*

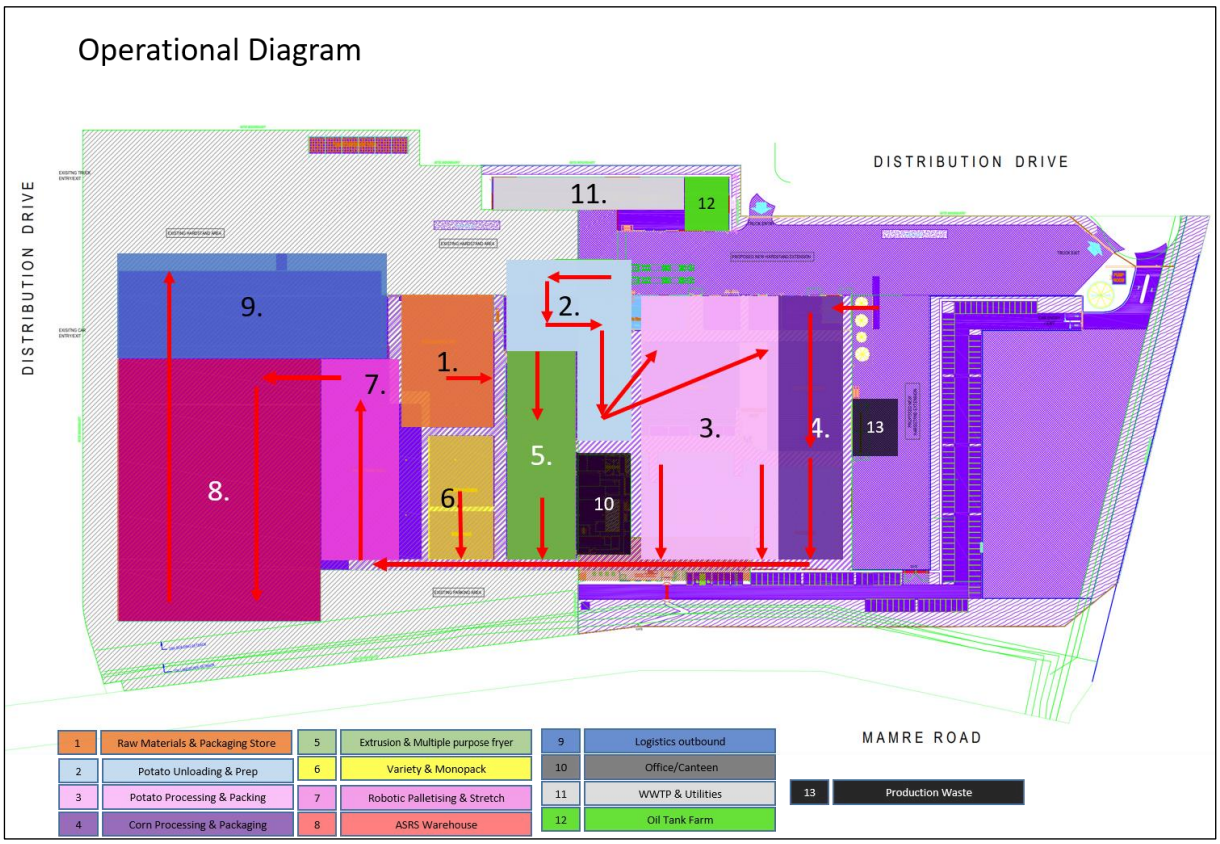


Figure 14 **Operational Flow Diagram** (Source: SBA, 2021)

The two (2) main processes proposed for the subject site involve production of potato and corn products.

(1) Potato —

i. Raw unbrushed potatoes received
ii. Potatoes unloaded into storage bunkers while awaiting quality assurance (QA) inspection
iii. Potatoes peeled and sliced
iv. Sliced potatoes then cooked in oil fryers
v. Product then seasoned in tumblers
vi. Product then bagged and packaged onto conveyor into the completed Stage 1 storage and distribution system

(2) Corn —

i Raw corn kernels received
ii Corn unloaded into storage silos
iii Corn is then clipped and prepared
iv Corn cooked in water soaking tanks
v Product is then cooked in oil fryers and dried in oven
vi Product then bagged and packaged onto conveyor into the completed Stage 1 storage and distribution system

Product inputs/outputs:

The just in time principle of raw materials delivery and storage is adopted by SBA, rather than on site storage. Potato, corn and oil are delivered daily by truck to the site and each delivery (up to 46,000kg) is stored in individual bunkers or silos until utilised. The potatoes and corn are cleaned and weighed as required and mechanically transferred to the processing halls for cooking. Other raw and packaging materials are stored within the main building and transported to a manufacturing area when required.

The new site will have the capacity to store up to 460 tonnes (t) of raw potatoes, 240 t of raw corn, 360 t of cooking oil and approximately 3,500 pallet spots for raw materials and packaging.

Details on material inputs (raw materials) outputs (snack products and waste) are outlined in **TABLE 9**.

TABLE 9: PRODUCT INPUTS/OUTPUTS	
Product Description	**Quantities (weekly)**
Raw potato delivered	Approximately 1,500 t to 2,000 t. (equates to approximately 90,000 t per annum; expandable to 3,000 t over a five (5) day operational utilisation)
Raw corn delivered	Approximately 140 t. (equates to approximately 7,000 t per annum, expandable to 240 t over a five (5) day operational utilisation)
Finished snack products	Approximately 2,500 pallets per day or 700 t per week. (expandable to 3,250 pallets per day over a five (5) day operational utilisation)
Raw product waste (potato and corn)	Approximately 7%. (equates to approximately 50 t per week, increasing up to 70t per week when at full utilisation; however the site is being designed to reduce waste <4%)

3.2.4.6 Mechanical plant

Potato plant:

The potato process starts with mechanical transfer to the potato prep area. This area of the plant will wash, peel and quality sort the potato preparing it to be cooked. Post sorting, the potato is hydraulically transfer to the processing hall. Each potato is then sliced to the required thickness and profile ready to be cooked through one of five potato fryers. Once the frying process has been completed, the chip is once again quality sorted via an automated optical station ready for mechanical transfer to product seasoning.

Corn plant:

The corn process starts with mechanical transfer to the corn cooking area. This area of the plant will cook and soak corn preparing the cooked corn kernels to be hydraulically transferred to the corn processing hall where the corn will be washed and milled into a masa dough across two processing lines. The dough will be sheeted and cut to the required size and shape. The shapes are cooked via an inline oven and oil frying process. The cooked chip is then mechanically transferred to product seasoning.

Cereal plant:

The Cereal processing starts with bulk bags of corn and rice flour being transferred pneumatically to a mixing silo. Once the correct blend is achieved, the mix is pneumatically transferred to one of two extrusion cooking process to form the desire shape and texture before being oven dried. The cooked snack is then mechanically transferred to product seasoning.

Multipurpose plant:

The multipurpose plant is capable of creating both pellet and sheeted snacks.

The pellet product is brought into the site as a preform and mechanically unloaded onto the processing line prior to the fryer. The pellet is cooked before being mechanically transferred to product seasoning.

The sheeted snacks utilise a number of ingredients that come in bulk bags or smaller (approximately 15kg) bags. Ingredients are then tipped into a mixing vessel, blended and then mechanically transferred to a wet mixing vessel where a dough is generated. As a dough the product will be sheeted and cut to the required size and shape. The shapes are cooked through a fryer before mechanically transferred to product seasoning.

Packaging and palletising:

Following the cooking process, the product is supplied directly to multiple in-line seasoning units before being weighed into individual packets (bagging). Each bagging station is similar and independent. The packs are mechanically transferred to automatic case packers. The finished case is conveyed to automatic palletisers and transferred to the adjacent warehouse for storage. Customer orders are subsequently picked and loaded onto truck for delivery.

Utilities:

Wastewater treatment plant – The wastewater treatment plant is designed to allow for the recycling of water through the manufacturing process and any water discharge to sewer to be cleaned to meet Sydney Water consent to discharge requirements.

Compressed air plant – The compressed air plant consists of three oil-free screw compressors. The compressed air is dried in glycol cooled air dryers.

Electrical power supply – Electrical power will be provided to the site by up to four 11 kV incoming lines to an Energy Australia substation.

3.2.4.7 Dangerous Goods

The proposed operations involve the storage and handling of materials classified as Dangerous Goods (DGs); specifically, Class 2.1 Flammable Gases, Class 2.2 Non-flammable Non-toxic Gases, Class 8 Corrosive Substances and Combustible Liquids.

Processing facility:

DGs will be used throughout this processing area for the cleaning of equipment. These DGs are all Class 8 substances in small 5 to 15 L packages and will be stored in a package store in the Potato Lab area as well as in dedicated DG cabinets. Both methods of storage shall provide separation between acids and bases.

Within the processing facility is a Heat Exchanger room. As part of the operations, this room will contain up to 300 L of lubricating oil stored in 20 L containers, which is classified as a Combustible Liquid.

Wastewater treatment plant:

The wastewater treatment plant will be an external treatment process for the wastewater generated during the product processing and manufacturing operations. The wastewater treatment plant will contain three Class 8 bulk tanks with aggregate quantity of 30,000 L of bases and 5,000 L of acids. These will be separated as per the requirements of AS 3780-2008 and have separate spillage containment systems to prevent the mixing of acids and bases.

The Wastewater treatment plant will also contain a refrigerated liquid nitrogen tank of up to 10,000 L capacity for use in tank blanketing and product packaging in the processing facility.

Liquefied Petroleum Gas (LPG) cylinder store:

LPG (Class 2.1) will be stored in a 210 kg (411 L water equivalent) cylinder external to the northern wall of the processing facility. The cylinder will be used to decant LPG into smaller cylinders which are used to power forklifts. The area will be naturally ventilated and caged per the requirements of AS/NZS 1596:2014.

A review of the quantity of goods to be stored on site would exceed the limits listed in the *State Environmental Planning Policy No. 33* (SEPP 33), which requires the associated risks to be assessed in the form of a Preliminary Hazard Analysis (PHA) to determine whether there is potential for offsite impacts. This assessment has been carried out by Riskcon Engineering Pty Ltd (Riskcon) and included in **Appendix 18** of this EIS.

3.2.4.8 Traffic

Based on operational information provided by SBA, the proposed development is anticipated to generate in the order of 84 vehicles per hour (94 vehicles per hour during seasonal peak periods) during the morning (8:00 am to 9:00 am) and 98 vehicles per hour during the evening (3:00 pm to 4:00 pm) peak hours respectively. The expected daily traffic generation is approximately 1,120 vehicles per day (1,174 vehicles per day during seasonal peak periods).

These traffic generation numbers would represent an increase over the approved First Estate Master Plan threshold by 11 vehicles per hour during the evening peak hour, which is considered a minor departure from the original approval. Accordingly, this equates to approximately one (1) vehicle every 6 minutes and is expected to not have any material traffic impact from previous approvals for the site. For a short period of seasonal peak period, the proposed development is expected to generally slightly more vehicular trips during morning peak (approximately 10 trips more than the approved thresholds); however, it should be noted that the overall daily trip generation is still less than the approved daily trip generation thresholds.

Additionally, SIDRA modelling undertaken as part of a previously approved assessment demonstrated that the intersection of Mamre Road and Distribution Drive is expected to operate with a Level of Service B during both the morning and evening peak periods with the approved First Estate Precinct Master Plan, which indicates that the intersection has spare capacity to accommodate the minor traffic generation increase associated with the proposal.

In summary, the proposal is supportable on traffic and transport planning grounds and is not expected to result in any adverse impacts on the surrounding road network or the availability of on-street parking environment.

A robust Transport Assessment has been prepared by Ason Group, which forms **Appendix 17** of this EIS.

3.2.4.9 Air Quality and Odour

During the operation of the proposal, the following activities are anticipated to result in potential emissions to air:

- Road traffic emissions: road traffic exhaust emissions from the movement of vehicles in and out of the subject site on paved road surfaces. These are associated with vehicles performing delivery tasks, and cars for workers in the office spaces;
- Vehicle idling emissions: road traffic exhaust emissions from vehicles idling at delivery and loading bays;
- Commercial kitchen emissions: emissions from food manufacturing activities at the proposal site, which are largely extracted and ducted to an after-burning waste heat boiler prior to discharge to atmosphere;
- Boiler emissions: emissions from the operation of gas-fired boilers, operated for the purpose of generating hot water for cooking purposes (e.g. cooking corn);
- Wastewater emissions: emissions from wastewater treated prior to discharge from the subject site.

An Air Quality and Odour Impact Assessment has been undertaken by Northstar Air Quality and included within **Appendix 22** of this EIS, to assess whether activities proposed as part of the proposed operations can be performed without giving rise to potential impacts at surrounding land uses. This risk assessment considers potential emissions associated with onsite cooking processes, and also provides a more holistic assessment of the proposal, including emissions which may be generated through the construction activities as well as transport, handling and storage of raw materials and any generated waste.

Reference should be made to **Section 6.1.5** for more detailed information.

3.3 SUPPORTING PROJECT DOCUMENTATION

Documents provided in support of the proposal are outlined in **TABLE 10**.

TABLE 10: DOCUMENT SCHEDULE		
Appendix No.	**Documentation**	**Consultant**
Appendix 1	Secretary's Environmental Assessment Requirements	NSW DPIE
Appendix 2	Quantity Surveyors Cost Report	Turner Townsend
Appendix 3	Title Documents	NSW Land Registry Services
Appendix 4	Survey Plan	Boxell Surveyors
Appendix 5	Architectural Plans	HLA Architects
Appendix 6	Landscape Plans	Geoscapes Landscape Architecture
Appendix 7	Civil Engineering Plans	Henry & Hymas Consulting Engineers
Appendix 8	Visual Impact Assessment Report	Geoscapes Landscape Architecture
Appendix 9	BDAR Wavier	(TBC)
Appendix 10	Environmental Site Assessment	JBS&G
Appendix 11	Geotechnical Investigation Report	PSM
Appendix 12	Biodiversity Assessment Report	Travers Bushfire & Ecology
Appendix 13	Bushfire Protection Assessment	Travers Bushfire & Ecology
Appendix 14	Stormwater Report	Henry & Hymas Consulting Engineers
Appendix 15	Infrastructure Report	Henry & Hymas Consulting Engineers
Appendix 16	Engagement and Communication Outcomes Report	SLR Consulting
Appendix 17	Traffic Impact Assessment	Ason Group
Appendix 18	Preliminary Hazard Analysis	Riskcon Engineering
Appendix 19	Dangerous Goods Design Report	Riskcon Engineering
Appendix 20	Fire Safety Strategy Report	Omnii Consulting Fire Engineers
Appendix 21	BCA Assessment Report	Mackenzie Group
Appendix 22	Air Quality and Odour Impact Assessment	North Star Air Quality
Appendix 23	Acoustic Impact Assessment	Renzo Tonin & Associates
Appendix 24	Ecologically Sustainable Development Report	Stantec
Appendix 25	Waste Management Plan	SLR Consulting
Appendix 26	Plan of Operational Management (Draft)	Snack Brands Australia
Whole document	Environmental Impact Statement	Willowtree Planning

3.4 PROJECT NEED

In response to the operational needs of SBA at a regional and national scale, it has been determined that the proposed purpose-built facility is required to support the growth of the business and increasing demand for their products.

The proposed development would assist in providing new employment opportunities through the provision of a manufacturing facility associated with adjoining warehouse and logistics land uses to facilitate employment-generating development and economic growth of the Mamre West Precinct within the WSEA. The proposal will also contribute to greater productivity and a significant increase in jobs for the Western Sydney Aerotropolis (WSA) in the industrial and logistics sector.

The proposed development, for the purposes of a manufacturing facility is considered consistent with the strategic direction of both the Western City District Plan published by the Greater Sydney Commission and the WSA Plan published by the Western Sydney Planning Partnership and the NSW Government. Additionally, the proposed development will further contribute to the growth of jobs in the WSEA; hence, contributing to the Western City District's economic growth, particularly supporting the Western Airport Aerotropolis.

Furthermore, the proposed development could support the growth of the existing sectors in the Western City District, such as logistics and freight, whilst promoting industry diversification; and would attract investment opportunities, ultimately fostering the growth of the wider Mamre Road area within the WSA as the economic catalyst of the Western Parkland City.

This proposal seeks to develop an industrial food manufacturing facility adjacent to SBA distribution centre at Orchard Hills. Currently SBA manufactures food products at two separate facilities located in Blacktown and Smithfield, before transporting the finished goods to Orchard Hills distribution centre. The proposed development seeks to consolidate the two existing manufacturing facilities into one new facility adjacent to the distribution centre.

The project seeks to reduce production costs through:

- Elimination of finish product shuttle
- Reduce loss of product
- Increase energy efficiency
- Reduced energy consumption

Current production volumes for SBA are over 36,000 metric tonnes (mT) per year, with the investment in capacity for future growth to approximately 50,000 mT per year. As such, the proposed annual production capacity being sought as part of this application is up to 50,000 mT per year.

The proposed development involves the transfer of operations and the replacement of outdated equipment, including:

- Development and installation of a corn processing and packaging plant
- Development and installation of a potato processing and packaging plant
- Transfer and installation of a cereal processing and packaging plant
- Transfer and installation of associated end of line equipment and wastewater treatment plant

3.5 CONSIDERATION OF ALTERNATIVES

The purpose of the proposed development is to increase the efficiency of SBA operations, whilst contributing towards the intended industrial character and nature of the IN1 General Industrial zone; providing a manufacturing facility which encourages employment opportunities and promotes the economic development of the WSEA and WSA. The proposed development seeks to ensure:

- It is compatible with surrounding development and the local context;
- It would provide increased operational efficiencies for manufacturing, storage and distribution of goods;
- It would result in minimal impact on the environment; and
- I would allow for the implementation of suitable mitigation measures, where required.

Overall, the scale of the proposed development is considered suitable, and the built form proposed would completely enhance and renew an undeveloped and underutilised land portion into a modernised, state-of-the-art manufacturing facility, which will be completely consistent with surrounding industrial-related uses in close proximity to the site and the wider WSEA. The site design and layout of the built form proposed, seeks to maintain consistency with the zone objectives under WSEA SEPP and enhance the underlying industrial character intended for the identified land portion, which is zoned for such permissible land uses. Furthermore, this would be achieved by the resultant built form that would reinforce the nature of the land use and is sensitive to the surrounding environment.

The options considered and subsequently dismissed, in arriving to the current proposal with regard to the proposed development included:

(a) 'Do Nothing' Scenario

This option was dismissed as the objectives of the proposal would not be met, including the objective of facilitating an employment-generating development. If the proposed development was not to proceed, the site would continue to remain vacant, or be developed for another industrial-related development.

(b) Development on an Alternative Site

Consideration to alternative sites were made, however these were dismissed as the subject site resulted in the most beneficial outcomes for the proposal as:

- it is located within a site zoned for employment generating purposes;
- the site has appropriate proximity from sensitive land activities including residential development;
- all potential environmental impacts of the proposal can be suitably mitigated within the site;
- the proximity to the regional road network provides increased economic benefits;
- has employment generating potential, during both the construction and operational phase;
- sufficient separation is maintained to the interface of surrounding receivers;
- the proposal does not adversely affect any area of heritage or archaeological significance; and
- the proposal can be developed with appropriate visual amenity given its surrounding context.

The proposal is justified on the basis it is compatible with the locality in which it is proposed while having no unacceptable economic, environmental or social impact.

(c) Different Site Configuration

The configuration of the proposed development was chosen based on the subject site's topography; road access; existing warehouse facility adjoining site and operational efficiencies; as well as the need to respond to the character of the surrounding IN1 General Industrial and RU2 Rural Landscape zones. It is noted that a different site configuration would not have been able to respond to the abovementioned site opportunities and constraints. This option was therefore not considered appropriate.

Notwithstanding, the proposed development is justified on the basis that it is compatible with the locality in which it is proposed, resulting in positive social and economic benefits, whilst appropriately managing and mitigating any potential environmental impacts requiring consideration.

From a locational perspective, the subject site was chosen as it would be able to accommodate a suitable platform and scale of development proposed. Accordingly, the site's locality is considered satisfactory from a strategic standpoint, for which the proposal responds to the industrial character intended for the site and immediate locality; and the limited environmental constraints which make the site suitable for development for the purposes of a warehouse and logistics hub.

Additionally, the subject site's locality is reinforced by its close proximity to nearby regional road networks, such as Mamre Road and both the M4 and M7 Motorways, which are considered highly beneficial for the overall operations of the proposal.

It is noted, that if the proposed development did not proceed, the subject site would not be able to provide employment opportunities for the wider WSEA in the industrial and warehousing sector. Additionally, it would not provide local employment opportunities, including generating construction and operational (including maintenance) jobs as envisaged in the WSA Plan.

At present SBA manufacture its products at the Blacktown and Smithfield facilities, to then transport to the newly constructed warehouse and distribution centre at 2 Distribution Drive, Orchard Hills. The relocation of these operations to the one facility would greatly improve operational efficiencies and lessen their impacts on the road network.

In light of the above information, the proposal for the purpose of a manufacturing facility at the subject site would allow for the delivery of more employment space and promote the supply and competitiveness of the existing employment land floorspace within the immediate locality, for which is surrounded by existing industrial development.

PART D LEGISLATIVE AND POLICY FRAMEWORK

4.1 CONTROLS AND POLICIES OVERVIEW

The following current and draft Commonwealth, State, Regional and Local planning controls and policies have been considered in the preparation of this application.

Commonwealth Planning Context

- *Environment Protection and Biodiversity Conservation Act 1999*

State Planning Context

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2000*
- *Protection of the Environment Operations Act 1997*
- *Biodiversity Conservation Act 2016*
- *State Environmental Planning Policy (State and Regional Development) 2011*
- *State Environmental Planning Policy (Infrastructure) 2007*
- *State Environmental Planning Policy (Western Sydney Employment Area) 2009*
- *State Environmental Planning Policy No 33 – Hazardous and Offensive Development*
- *State Environmental Planning Policy No 55 – Remediation of Land*

Strategic Planning Context

- *Greater Sydney Region Plan – A Metropolis of Three Cities*
- *Western City District Plan*
- *Western Sydney Employment Area*
- *Future Transport Strategy 2056*

Local Planning Context

- *Penrith Local Environmental Plan 2010*
- *Penrith Development Control Plan 2014*
- *Mamre West Land Investigation Area Development Control Plan 2016*

This proposal has been carefully assessed against the requirement and objectives of all of the above planning statutory and policy documents. A detailed analysis is set out in the following sections:

4.2 COMMONWEALTH PLANNING CONTEXT

4.2.1 Environment Protection and Biodiversity Conservation Act 1999

Under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), any action (which includes a development, project or activity) that is considered likely to have a significant impact on Matters of National Environmental Significance (MNES) (including nationally threatened ecological communities and species and listed migratory species), must be referred to the Commonwealth Minister for the Environment. The purpose of the referral is to allow a decision to be made about whether an action requires approval on a Commonwealth level. If an action is considered likely to have significant impact on MNES, it is declared a "Controlled Action" for which formal Commonwealth approval is required.

Referral to the Commonwealth Minister is not required.

4.3 STATE PLANNING CONTEXT

4.3.1 Environmental Planning and Assessment Act 1979

Pursuant to Section 4.36(2) of the EP&A Act, a *State environmental planning policy may declare any development, or any class or description of development, to be State significant development*.

The proposed development constitutes SSD as detailed in **Section 4.3.5**.

Further, the proposal is deemed to be entirely consistent with the EP&A Act, particularly Clause 1.3.

The following responses are provided regarding each Object listed in Clause 1.3:

TABLE 11: EP&A ACT OBJECTS	
Object	**Description**
(a)	*to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,*
	Response: *to promote the social and economic welfare of the community* The proposed development strongly promotes the social and economic welfare of the community, as it has significant employment-generating potential. It is anticipated that the proposal would generate jobs in the order of: ▪ 497 construction jobs ▪ 415 operational full-time jobs (87 existing warehouse and 328 new manufacturing facility) The creation of these employment opportunities would have a direct impact on both the local and broader communities. This access to both construction and full-time operational jobs, is highly significant, given the scale, quantum, type and location of this employment, nearer to where people live. The social welfare of the community is also promoted and achieved through the permanent provision of workforce opportunities to individuals and their families in a new area, with increasing employment supplies. The proposal also fulfils the underlying objectives of the Western City District. *a better environment by the proper management, development and conservation of the State's natural and other resources* In its current form, the subject site presents as a vacant industrial site. The proposed development would afford the subject site the industrial operations it is intended for. Through informed architectural design, the proposed development incorporates a number of sustainable design principles and includes initiatives, designed to mitigate environmental impacts.
(b)	*to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,*
	Response: The intent of the proposed development is to create, through siting, design, landscaping and architecture, a high quality built form. This is apparent through the Architectural and Landscape Plans, prepared by HLA Architects and Geoscapes Landscape Architects. These plans demonstrate the architectural features proposed for the subject site, comprising the following key design elements, including: ▪ Articulation through the use of mixed materials and colouring, variation in building height, and architectural finishes; ▪ Integration of awnings, screens, glazing and feature windows; ▪ Installation of solar panels; ▪ Addition of complementary landscaping, including shade trees.

TABLE 11: EP&A ACT OBJECTS	
Object	**Description**
	The following Ecologically Sustainable Development (ESD) measures are proposed for the development: ▪ Energy – including improved energy efficiency across the buildings and its associated sources. ▪ Passive Design Principles – reducing the projects overall requirement for building services. ▪ Water Efficiency – including reduced potable water demand. ▪ Waste Management – including the incorporation of a waste treatment plant. ▪ Ecology – Maintaining ecology through landscaping where practical.
(c)	*to promote the orderly and economic use and development of land,*
	Response: The siting and location of the proposed development is highly logical, given the locality of recently development SBA warehouse and distribution facility adjacent to the proposed food manufacturing facility, which will work hand-in-hand. Further, the proposed development is consistent with the aims and objectives of the WSEA SEPP, which is given a comprehensive assessment in **Section 4.5.1** of this EIS. The proposed development of the subject site is both logical and orderly, based on the following: 1. Its proximity to the existing SBA warehouse and distribution facility; 2. It would deliver employment-generating opportunities in both the construction and operational phases in an area already earmarked by both State and Regional Policy for employment; 3. It would provide a new economically and ecologically-sustainable development, delivering new industry-best-practice in industrial construction; 4. It would deliver a facility with enhanced access to the regional road network, including the M4 and M7 Motorway, providing improved worker travel-connectivity to the wider locality; 5. It would have minimal impact on the environment, with best-practice sustainability measures, to promote ecologically sustainable development; 6. All necessary infrastructure is already available at this subject site, allowing operations to commence at no cost to Government; The proposed development is also deemed orderly because the land uses proposed would not pose a risk to any existing commercial, industrial or logistic businesses within the broader area. According to expert assessment, the overall scale of the proposed development and the low-interface-impacts with surrounding properties, demonstrates that the subject site can be developed for employment purposes immediately. This represents orderly development of the subject site as proposed under this SSD Application.
(d)	*to promote the delivery and maintenance of affordable housing,*
	Response: This objective is not applicable to the proposed development, as the proposal does not seek consent for housing.
(e)	*to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,*
	Response: Given that the site is has been subject to extensive works already, the proposed development would not have a significant impact on biodiversity values. A BDAR wavier has been sought, in accordance with Section 7.9 of the BC Act. A Biodiversity Assessment Report has been prepared by Travers Bushfire and Ecology (**Appendix 12**) for the purpose of seeking a BDAR wavier. The findings conclude that: ▪ The site is highly disturbed and previously completely cleared; ▪ All vegetation present is derived and almost entirely comprised of exotic species; ▪ The study area provides vegetated stormwater drains and a dam providing potential frog breeding habitat. Detailed assessment of Green and Golden Bell

TABLE 11: EP&A ACT OBJECTS	
Object	**Description**
	Frog (including a Test of Significance) concludes that the study area is not of any likely importance or use to Green and Golden Bell Frog and a viable local population is not likely present to warrant any further survey or assessment.
(f)	*to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),*
	Response: The Office of Environment and Heritage (OEH) confirmed as part of SSD-9429 that Aboriginal Cultural Heritage was addressed and conditioned in the Concept Plan approval for the site (SSD-7173).
(g)	*to promote good design and amenity of the built environment,*
	Response: The vision of the proposed development is to create a quality built form with integrated landscaping. The proposed development is considered to promote both good design and improved amenity, through the use of new-age materials and innovative contemporary design including: ▪ Precast concrete panels ▪ Metal cladding ▪ Panelised cladding ▪ Metal wall sheeting ▪ Glazing ▪ Complementary landscaping The preferred material selections above, have been chosen based on their corresponding sustainable characteristics and design principles, which include: ▪ Sustainable, low impact materials; ▪ Being natural and robust; ▪ Using recycled and local material; and ▪ Palette that evokes 'sustainability'.
(h)	*to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,*
	Response: The proposed development would be implemented through best-industry practice standards and measures. The proposal has been designed in accordance with the BCA, the NCC and the requirements of Fire and Rescue NSW. This incorporates into the design, all statutory and functional requirements of the BCA, regarding access, egress and fire, which are deemed necessary to safeguard the safety of building occupants and the longevity of the development.
(i)	*to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,*
	Response: The proposed development is considered to impact positively on other existing (and proposed) developments within the wider locality, which is further reinforced throughout the supporting specialist reports and the body of this EIS. Where possible impacts have been identified, appropriate management and mitigation measures have been applied accordingly. It is noted, that throughout the assessment process, relevant agencies have been consulted and provided opportunity to both assess the proposed development and provide comments. Community consultation has been conducted which has assisted to inform the final submitted design and reinforces compliance with this objective. This has included numerous Government agency meetings and notification letters to both Government agencies and all key stakeholders. Several meetings have been held with stakeholders, which are detailed further in **PART E** of this EIS.

TABLE 11: EP&A ACT OBJECTS	
Object	**Description**
(j)	*to provide increased opportunity for community participation in environmental planning and assessment.*
	Response: Community and stakeholder engagement has been undertaken for the proposed development. This has included meetings and notification letters to both agencies and all potentially-impacted residents and existing SBA employees. A Community and Stakeholder Participation Strategy (located in **Appendix 16**) has been prepared by SLR, in support of this SSD Application, offering a summary and analysis of all community and stakeholder consultation sessions, distilling into themes, and those items identified in the consultation process, as significant.

4.3.2 Environmental Planning and Assessment Regulation 2000

The EP&A Regulation is the EP&A Act's primary subordinate legislation and contains key operational provisions for the NSW planning system, including those relating to EIS'.

4.3.2.1 Schedule 1 – Forms

Pursuant to Schedule 1 of the EP&A Regulation, this EIS includes all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1, as detailed in **TABLE 12**.

TABLE 12: SCHEDULE 1 OF EP&A REGULATION	
Requirements	**Satisfied by**
Part 1 Development applications	
2 Documents to accompany development application	
(1) A development application must be accompanied by the following documents—	
(a) a site plan of the land,	Refer to **Appendix 5** of this EIS.
(b) a sketch of the development,	Refer to **Appendix 5** of this EIS.
(c) a statement of environmental effects (in the case of development other than designated development or State significant development),	Not applicable to this SSD Application.
(d) in the case of development that involves the erection of a building, an A4 plan of the building that indicates its height and external configuration, as erected, in relation to its site (as referred to in clause 56 of this Regulation),	Refer to **Appendix 5** of this EIS.
(e) an environmental impact statement (in the case of designated development or State significant development),	Refer to **whole EIS document**.
(f) a species impact statement (in the case of land that is, or is part of, critical habitat or development that is likely to significantly affect threatened species, populations or ecological communities, or their habitats), but not if the development application is for State significant development,	Not applicable to this SSD Application.
(g) if the development involves any subdivision work, preliminary engineering drawings of the work to be carried out,	Not applicable to this SSD Application.
(h) if an environmental planning instrument requires arrangements for any matter to have been made before development consent may be granted (such as arrangements for the provision of utility services), documentary evidence that such arrangements have been made,	Refer to **Section 6.1.17** of this EIS.

TABLE 12: SCHEDULE 1 OF EP&A REGULATION	
Requirements	**Satisfied by**
(i) if the development involves a change of use of a building (other than a dwelling-house or a building or structure that is ancillary to a dwelling-house and other than a temporary structure)— *(i) a list of the Category 1 fire safety provisions that currently apply to the existing building, and* *(ii) (ii) a list of the Category 1 fire safety provisions that are to apply to the building following its change of use,*	Refer to **Section 6.1.12** of this EIS.
(j) if the development involves building work to alter, expand or rebuild an existing building, a scaled plan of the existing building,	Refer to **Appendix 5** of this EIS.
(k) if the land is within a wilderness area and is the subject of a wilderness protection agreement or conservation agreement within the meaning of the Wilderness Act 1987, a copy of the consent of the Minister for the Environment to the carrying out of the development,	Not applicable to this SSD Application.
(k1) in the case of development comprising mining for coal (within the meaning of section 380AA of the Mining Act 1992)—documentary evidence that the applicant holds an authority under the Mining Act 1992 in respect of coal and the land concerned or has the written consent of the holder of such an authority to make the development application,	Not applicable to this SSD Application.
(l) in the case of development to which clause 2A applies, such other documents as any BASIX certificate for the development requires to accompany the application,	Not applicable to this SSD Application.
(m) in the case of BASIX optional development—if the development application is accompanied by a BASIX certificate or BASIX certificates (despite there being no obligation under clause 2A for it to be so accompanied), such other documents as any BASIX certificate for the development requires to accompany the application,	Not applicable to this SSD Application.
(n) if the development involves the erection of a temporary structure, the following documents— *(i) documentation that specifies the live and dead loads the temporary structure is designed to meet,* *(ii) a list of any proposed fire safety measures to be provided in connection with the use of the temporary structure,* *(iii) in the case of a temporary structure proposed to be used as an entertainment venue—a statement as to how the performance requirements of Part B1 and NSW Part H102 of Volume One of the Building Code of Australia are to be complied with (if a performance solution, to meet the performance requirements, is to be used),* *(iv) documentation describing any accredited building product or system sought to be relied on for the purposes of section 4.15(4) of the Act,* *(v) copies of any compliance certificates to be relied on,*	Not applicable to this SSD Application.

4.3.2.2 Schedule 2 – Environmental Impact Statements

This EIS has been prepared in accordance with clauses 6 and 7 of Schedule 2, as detailed in **TABLE 13**.

TABLE 13: SCHEDULE 2 OF EP&A REGULATION	
Requirements	**Satisfied by**
General Provisions	
6 Form of environmental impact statement	
An environmental impact statement must contain the following information—	
(a) the name, address and professional qualifications of the person by whom the statement is prepared,	Refer to **page ii** of this EIS.
(b) the name and address of the responsible person,	Refer to **page ii** of this EIS.
(c) the address of the land— *(i) in respect of which the development application is to be made, or* *(ii) on which the activity or infrastructure to which the statement relates is to be carried out,*	Refer to **Section 0** of this EIS.
(d) a description of the development, activity or infrastructure to which the statement relates,	Refer to **Section 3.2** of this EIS.
(e) an assessment by the person by whom the statement is prepared of the environmental impact of the development, activity or infrastructure to which the statement relates, dealing with the matters referred to in this Schedule,	Refer to **PART F** of this EIS.
(f) a declaration by the person by whom the statement is prepared to the effect that— *(i) the statement has been prepared in accordance with this Schedule, and* *(ii) the statement contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure to which the statement relates, and* *(iii) that the information contained in the statement is neither false nor misleading.*	Refer to **page ii** and of this EIS.
7 Content of environmental impact statement	
(1) An environmental impact statement must also include each of the following—	
(a) a summary of the environmental impact statement,	Refer to **page 1** of this EIS.
(b) a statement of the objectives of the development, activity or infrastructure,	Refer to **Section 3.1** of this EIS.
(c) an analysis of any feasible alternatives to the carrying out of the development, activity or infrastructure, having regard to its objectives, including the consequences of not carrying out the development, activity or infrastructure,	Refer to **Section 3.5** of this EIS.
(d) an analysis of the development, activity or infrastructure, including—	
(i) a full description of the development, activity or infrastructure, and	Refer to **Section 3.2** of this EIS.

TABLE 13: SCHEDULE 2 OF EP&A REGULATION	
Requirements	**Satisfied by**
(ii) a general description of the environment likely to be affected by the development, activity or infrastructure, together with a detailed description of those aspects of the environment that are likely to be significantly affected, and	Refer to **PART B** and **PART F** of this EIS.
(iii) the likely impact on the environment of the development, activity or infrastructure, and	Refer to **PART F** of this EIS.
(iv) a full description of the measures proposed to mitigate any adverse effects of the development, activity or infrastructure on the environment, and	Refer to **PART G** of this EIS.
(v) a list of any approvals that must be obtained under any other Act or law before the development, activity or infrastructure may lawfully be carried out,	Refer to **PART D** of this EIS.
(e) a compilation (in a single section of the environmental impact statement) of the measures referred to in item (d)(iv),	Refer to **PART G** of this EIS.
(f) the reasons justifying the carrying out of the development, activity or infrastructure in the manner proposed, having regard to biophysical, economic and social considerations, including the principles of ecologically sustainable development set out in subclause (4).	Refer to **PART H** of this EIS.
(2) Subclause (1) is subject to the environmental assessment requirements that relate to the environmental impact statement.	Refer to **Section 1.5** of this EIS.
(3) Subclause (1) does not apply if— *(a) the Planning Secretary has waived (under clause 3(9)) the need for an application for environmental assessment requirements in relation to an environmental impact statement in respect of State significant development, and* *(b) the conditions of that waiver specify that the environmental impact statement must instead comply with requirements set out or referred to in those conditions.*	Not applicable.
(4) The principles of ecologically sustainable development are as follows— *1. the precautionary principle, namely, that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. In the application of the precautionary principle, public and private decisions should be guided by—* *(i) careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment, and* *(ii) an assessment of the risk-weighted consequences of various options,* *2. inter-generational equity, namely, that the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations,* *3. conservation of biological diversity and ecological integrity, namely, that conservation of biological*	Refer to **Section 8.1.5** of this EIS.

TABLE 13: SCHEDULE 2 OF EP&A REGULATION	
Requirements	**Satisfied by**
diversity and ecological integrity should be a fundamental consideration, 4. *improved valuation, pricing and incentive mechanisms, namely, that environmental factors should be included in the valuation of assets and services, such as—* *(i) polluter pays, that is, those who generate pollution and waste should bear the cost of containment, avoidance or abatement,* *(ii) the users of goods and services should pay prices based on the full life cycle of costs of providing goods and services, including the use of natural resources and assets and the ultimate disposal of any waste,* *(iii) environmental goals, having been established, should be pursued in the most cost effective way, by establishing incentive structures, including market mechanisms, that enable those best placed to maximise benefits or minimise costs to develop their own solutions and responses to environmental problems.*	

4.3.2.3 Schedule 3 – Designated Development

Section 4(1) of the EP&A Regulation states, that any development described in Part 1 of Schedule 3, would be declared to be Designated Development for the purposes of the EP&A Act.

The proposal, being for a food manufacturing, is expected to exceed the threshold of item 1 (>30,000 tonnes), Part 1 of Schedule 3; therefore considered Designated Development.

> ***1 Agricultural produce industries***
> *Agricultural produce industries (being industries that process agricultural produce, including dairy products, seeds, fruit, vegetables or other plant material)—*
> *(a) that crush, juice, grind, mill, gin, mix or separate more than 30,000 tonnes of agricultural produce per year, or*
> *(b) that release effluent, sludge or other waste—*
> *(i) in or within 100 metres of a natural waterbody or wetland, or*
> *(ii) in an area of high watertable, highly permeable soils or acid sulphate, sodic or saline soils.*

4.3.3 Protection of the Environment Operations Act 1997

Another important item of legislation, against which this proposal has been assessed, is the *Protection of the Environment Operations Act 1979* (POEO Act). Schedule 1 of the POEO Act contains a core list of activities that require a licence before they may be undertaken or carried out. The definition of an 'activity' for the purposes of the POEO Act is:

> *"an industrial, agricultural or commercial activity or an activity of any other nature whatever (including the keeping of a substance or an animal)."*

As above, the proposed operations are expected to exceed the general agricultural processing capacity threshold of 30,000 tonnes of agricultural products per year, pursuant to item 2, Part 1 of Schedule 1 of the POEO Act.

As such, an environment protection licence (EPL) will be required for the proposed operations.

4.3.4 Biodiversity Conservation Act 2016

The BC Act is the key legislation in NSW, relating to the protection and management of biodiversity and threatened species. The purpose of the BC Act is to "maintain a healthy, productive and resilient environment, for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development". The BC Act is supported by a number of regulations, including the *Biodiversity Conservation Regulation 2017* (BC Regulation).

The proposed development site is clear of vegetation and does not contain any areas of biodiversity value, as such a BDAR wavier is sought. This is consistent with the previous SSD-9429 for the existing Snack Brands Warehouse Facility, in which the EHO recommended that a BDAR wavier be sought.

4.3.5 State Environmental Planning Policy (State and Regional Development) 2011

The SRD SEPP identifies development that is State significant development, State significant infrastructure and critical State significant infrastructure, and regionally significant development.

Proposed developments that are listed in Schedule 1 of SRD SEPP are identified as being SSD. Clause 3 of Schedule 1 of SRD SEPP states:

> ***3 Agricultural produce industries and food and beverage processing***
>
> *Development that has a capital investment value of more than $30 million for any of the following purposes—*
>
> *(a) abattoirs or meat packing, boning or products plants, milk or butter factories, fish packing, processing, canning or marketing facilities, animal or pet feed production, gelatine plants, tanneries, wool scouring or topping or rendering plants,*
> *(b) cotton gins, cotton seed mills, sugar mills, sugar refineries, grain mills or silo complexes, edible or essential oils processing, breweries, distilleries, ethanol plants, soft drink manufacture, fruit juice works, canning or bottling works, bakeries, small goods manufacture, cereal processing, margarine manufacturing or wineries,*
> *(c) organic fertiliser plants or composting facilities or works.*

The proposed development has a CIV of $222,532,480.00 (excluding GST). As the project exceeds the $30 million statutory threshold and meets all other criteria in SRD SEPP, it is deemed and categorised as SSD.

A complete QS Report is included at **Appendix 2** of this EIS.

4.3.6 State Environmental Planning Policy (Infrastructure) 2007

State Environmental Planning Policy (Infrastructure) 2007 (ISEPP) aims to facilitate the effective delivery of infrastructure across the State.

4.3.6.1 Clause 66C – Development adjacent to pipeline corridors

Division 12A, Subdivision 2 provides requirements for development adjacent to pipeline corridors. The subject site is located more than 100m north of the Warragamba Pipeline, therefore no further consideration of Clause 66C of the ISEPP is warranted.

4.3.6.2 Clause 101 – Development with frontage to classified road

Pursuant to Clause 101, access to Mamre Road has been restricted. Further, a robust Transport Assessment has been prepared by Ason Group to demonstrate that the safety, efficiency and ongoing operation of Mamre Road will not be adversely affected by the proposed development.

4.3.6.3 Clause 104 – Traffic generating development

ISEPP repeals the former *State Environmental Planning Policy No. 11 – Traffic Generating Development* and, pursuant to Clause 104, provides for certain proposed developments known as Traffic Generating Development, to be referred to NSW Roads and Maritime Services (NSW RMS) for concurrence.

Schedule 3 of ISEPP, lists the types of development that are defined as Traffic Generating Development. The referral thresholds for 'warehouse or distribution centres' development includes sites of:

- *8,000m² in site area or (if the site area is less than the gross floor area) gross floor area;*

The proposal is considered Traffic Generating Development and will be referred to NSW RMS for concurrence.

4.3.7 State Environmental Planning Policy (Western Sydney Employment Area) 2009

The subject site forms part of the WSEA and is situated within Precinct 13 – Mamre West of the WSEA SEPP. The WSEA SEPP was formulated in 2009 specifically to promote employment outcomes in the broader Western Sydney Region in proximity to where people live. The proposed development is highly consistent with the aims of WSEA SEPP, in that it would strongly promote economic development and employment opportunities, exactly as per the aims of the SEPP. Employment and Investment results anticipated for the subject site, would be consistent with both short and long-term outcomes for the broader Mamre Road area.

The aims of WSEA SEPP are addressed as follows:

> *"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."*

Response: The proposal will support future employment generation for the WSEA by consolidating three (3) existing SBA facilities from other areas, to a single premises at 2 – 14 Distribution Drive, Orchard Hills.

> *"To provide for the co-ordinated planning and development of land in Western Sydney Employment Area."*

Response: The proposal represents a logical and rational development with respect to the vision for both the WSEA and Aerotropolis to provide industry and employment lands. In this respect, the same scale and form of development is proposed for the subject site in a coordinated and orderly manner. This logical extension proposal contributes to the provision of employment, in line with the aims of WSEA SEPP. It is an appropriate form of development as the Mamre West Precinct transitions from rural to industrial and supports the intended objectives of the subject proposal.

The broader Aerotropolis Precinct and Western Sydney Airport would not be affected by the proposal, given its location; and all planning for this broader area could proceed as planned and not impact on the operation proposed under this SSD Application.

> *"To rezone land for employment and environmental conservation purposes."*

Response: The subject site is appropriately zoned IN1 General Industrial under the WSEA SEPP.

> *"To improve certainty and regulatory efficiency by providing a consistent planning regime for future development and infrastructure provision in the Western Sydney Employment Area."*

Response: The proposed development would represent a logical extension to existing and operational employment lands within the WSEA, as well as an orderly and logical extension of the existing SBA operations within the Mamre West Precinct.

The scale of development proposed is deemed entirely consistent with the employment lands, that are in relatively close proximity to the site, in terms of overall built-form, and intensity of operations.

> *"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."*

Response: The site is subject to the *Mamre West Land Investigation Area Development Control Plan 2016*.

"To conserve and rehabilitate areas that have a high biodiversity or heritage or cultural value, in particular area of remnant vegetation."

Response: Areas of biodiversity and heritage value will not be unacceptably impacted by the proposal. Adequate management and mitigation measures will be implemented for the proposal during both construction and operational phases.

4.3.7.1 Permissibility under the WSEA SEPP

The subject site is zoned IN1 General Industrial under the provisions of WSEA SEPP (**Figure 15**).

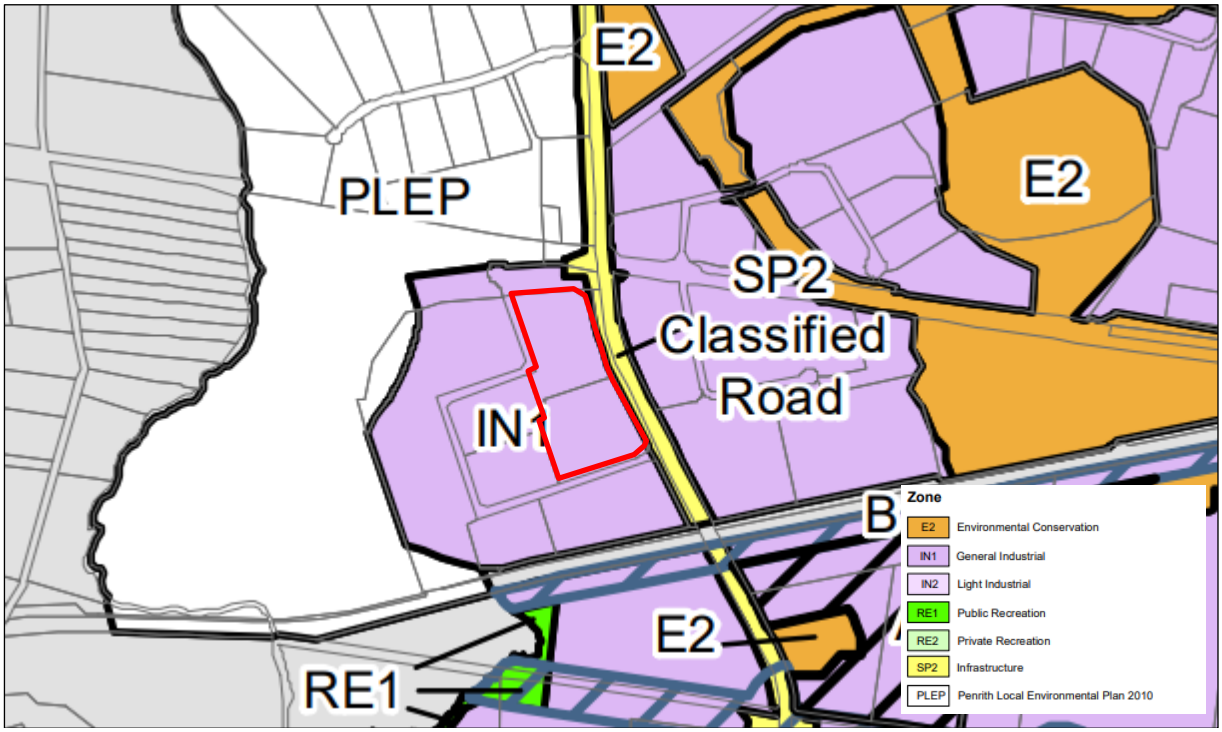


Figure 15 Land Zoning Map (Source: NSW Legislation, 2021)

Within the IN1 zone the following are permissible without consent:

Nil.

Within the IN1 zone the following are permissible with consent:

Building identification signs; Business identification signs; Depots; Environmental facilities; Environmental protection works; Food and drink premises; Freight transport facilities; Garden centres; Hardware and building supplies; Industrial retail outlets; Industrial training facilities; ***Industries (other than offensive or hazardous industries)****; Neighbourhood shops; Places of public worship; Recreation areas; Recreation facilities (indoor); Roads; Service stations; Storage premises; Transport depots; Truck depots; Vehicle body repair workshops; Vehicle repair stations;* ***Warehouse or distribution centres****.*

Within the IN1 zone the following are prohibited:

Any development not specified in item 2 or 3.

The proposal comprising a manufacturing facility is intended to facilitate the use of the site for industry purposes associated with the adjoining warehouse and distribution use. Therefore, the uses may be characterised as follows, in accordance with the *Standard Instrument – Principal Local Environmental Plan* (Standard Instrument),

- a **warehouse or distribution centre** means:

a building or place used mainly or exclusively for storing or handling items (whether goods or materials) pending their sale, but from which no retail sales are made, and includes local distribution premises.

- an **industrial activity** means:

  the manufacturing, production, assembling, altering, formulating, repairing, renovating, ornamenting, finishing, cleaning, washing, dismantling, transforming, processing, recycling, adapting or servicing of, or the research and development of, any goods, substances, food, products or articles for commercial purposes, and includes any storage or transportation associated with any such activity.

The proposal for a manufacturing facility is permissible with consent within the IN1 zone.

TABLE 14 outlines the consistency and compliance of the proposal with the relevant development standards and controls under WSEA SEPP.

TABLE 14: DEVELOPMENT STANDARDS - WESA SEPP	
Clause	**Comment**
Principal development standards	
Clause 20 – Ecologically sustainable development	Proposed development, for the purposes of a manufacturing facility, incorporates a number of ESD initiatives to reduce the consumption of potable water and greenhouse gas emissions of the future operations. Initiatives relate to: ▪ Indoor environmental quality; ▪ Potable water reduction; ▪ Heat island effect; ▪ Energy and greenhouse gas emissions reduction; ▪ Minimising waste to landfill; ▪ Land use and ecology; ▪ Environmental and building management.
Clause 21 – Height of buildings	No maximum building height has been adopted under WSEA SEPP. However, the consent authority must be satisfied that: *(a) building heights will not adversely impact on the amenity of adjacent residential areas, and,* *(b) site topography has been taken into consideration.* Notwithstanding, the maximum building height with respect to the proposed development would be consistent with existing low-bay warehouse component at 2 Distribution Drive. For consistency and completeness, a Visual Impact Assessment prepared by SLR forms **Appendix 8** of this EIS, which concludes that the proposed development will create some visual impacts for receptors in close proximity to the site. However, the significance of these impacts is either low or negligible, due to the fact the proposal is located against the backdrop of the existing SBA high bay and other industrial development located within the immediate surround context.
Clause 22 – Rainwater harvesting	Under clause 22 of WSEA SEPP, *"the consent authority must not grant consent to development on land to which this Policy applies unless it is satisfied that adequate arrangements will be made to connect the roof areas of buildings to such rainwater harvesting scheme (if any) as may be approved by the Director-General."* Water usage reduction within the manufacturing facility is proposed to be achieved through the use of 4-star WELS rated water fixtures (or higher), in addition to water reuse for toilet flushing and irrigation purposes. A 50kL rainwater tank is proposed to be provided for this purpose. This rainwater storage is to be provided in the form of an underground tank within the external car parking.

TABLE 14: DEVELOPMENT STANDARDS - WESA SEPP	
Clause	**Comment**
Clause 23 – Development adjoining residential land	Clause 23 applies to land within 250m of land zoned primarily for residential purposes. Land directly to the north of the subject site is zoned IN1, beyond which is land zoned RU2 Rural Landscape. As such, the subject site is not located within 250m of residential zoned land, nor does it adjoin any residential zoned land. Notwithstanding, the relevant controls of Clause 23 have been considered and accommodated as part of the proposed development. *(a) wherever appropriate, proposed buildings are compatible with the height, scale, siting and character of existing residential buildings in the vicinity, and* — The maximum building height of the proposed development would be consistent with existing low-bay warehouse component at 2 Distribution Drive.. For consistency and completeness, a Visual Impact Assessment prepared by SLR forms **Appendix 8** of this EIS, which concludes that the proposed development will create some visual impacts for receptors in close proximity to the site. However, the significance of these impacts is either low or negligible, due to the fact the proposal is located against the backdrop of the existing SBA high bay and other industrial development located within the immediate surround context. *(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* — All goods are to be stored within the proposed built form, and where possible, plant and equipment are also contained within the building. However, the proposed operations do require plant to be located on the roof of the building, which will be suitably screened (as shown on the architectural elevations). Further to this, extensive landscaping is proposed along the northern and eastern boundaries to screen the proposed development. *(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* — To help mitigate and soften the building particularly from Mamre Road and receptors to the north, native species will be planted at regular intervals along the northern and eastern boundaries of 14 Distribution Drive, Orchard Hills – note, planting to the existing warehouse is to remain unchanged, as per SSD-9429 approval. *(d) noise generation from fixed sources or motor vehicles associated with the development will be effectively insulated or otherwise minimised, and* — Renzo Tonin have quantified the operational noise emission from the proposed development and has assessed noise at the nearest sensitive receivers. Based on their assumptions and inputs within this report, it has been established that operation of the site is capable of complying with relevant EPA and Council noise emission requirements. *(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*

TABLE 14: DEVELOPMENT STANDARDS - WESA SEPP	
Clause	**Comment**
	— The proposed development is consistent with the existing operations of the First Estate Precinct, including their hours of operation. Traffic movement and parking generated by the proposed development has been suitably assessed by Ason Group. In terms of headlight glare and security lighting, the nearest existing resident is located approximately 120m north of the subject site, and under the ownership of Altis Property Partners. Substantial landscaping has been incorporated to buffer the proposed development from land to the north. In addition, a letter of support has been granted by Altis Property Partners, refer to **Appendix 3** of this EIS. *(f) the development will provide adequate off-street parking, relative to the demand for parking likely to be generated, and* — The Transport Assessment prepared by Ason Group and contained within **Appendix 17** of this EIS, provides a first principles based assessment. The proposed on-site parking meets the demand of the SBA facility – refer to **Section 6.1.6** of this EIS for further detail. *(g) the site of the proposed development will be suitably landscaped, particularly between any building and the street alignment.* — To help mitigate and soften the building, particularly from Mamre Road and receptors to the north, substantial landscaping is proposed, as shown in the Landscape Plans prepared by Geoscapes (**Appendix 6** of this EIS).
Clause 24 – Development involving subdivision	The consent authority must consider the following for development involving subdivision: *(a) the implications of the fragmentation of large lots of land,* *(b) whether the subdivision will affect the supply of land for employment purposes,* *(c) whether the subdivision will preclude other lots of land to which this Policy applies from having reasonable access to roads and services.* The proposal does not involve any subdivision.
Clause 25 – Public utility infrastructure	The proposal involves the provision of utilities services at the subject site. Adequate arrangements for the provision of public utility infrastructure will be provided as part of the proposal. Refer to **Section 3.2.2** of this EIS.
Clause 26 – Development on or in vicinity of proposed transport infrastructure routes	The subject site adjoins the Mamre Road proposed transport infrastructure as illustrated on the Transport and Arterial Road Infrastructure Plan Map.

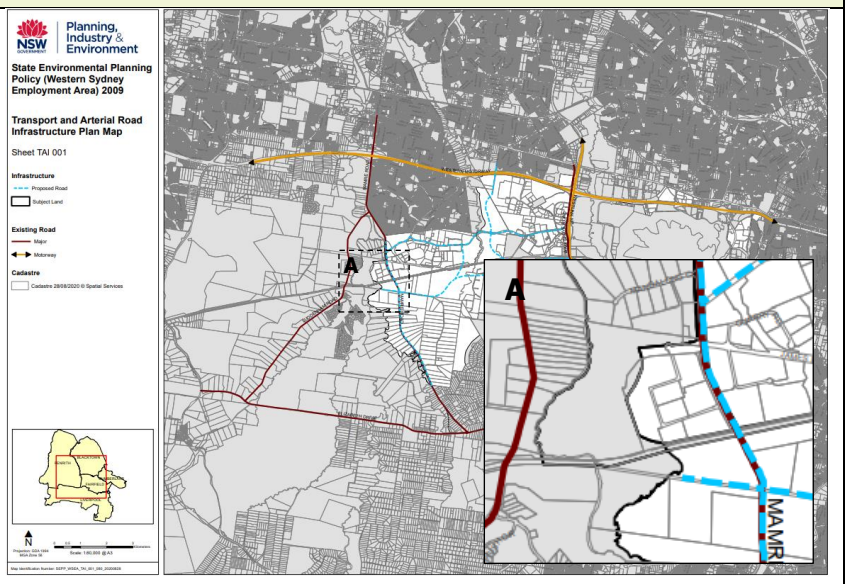
TABLE 14: DEVELOPMENT STANDARDS - WESA SEPP	
Clause	**Comment**
	 Reference should be made to **Section 6.1.6** and **Appendix 17** of this EIS for information on the compatibility of the development to which the application relates with the proposed transport infrastructure route concerned.
Clause 27 – Exceptions to development standards	The proposal does not seek to contravene any development standards.
Miscellaneous provisions	
Clause 28 – Relevant acquisition authority	The subject site does not contain any areas reserved for acquisition.
Clause 29 – Industrial Release Area – satisfactory arrangements for the provision of regional transport infrastructure and services	Under SSD 7173, a Voluntary Planning Agreement (VPA) was entered into with the Minister for Planning, which applies to the subject site. Under Clause 29 the proposed development would be referred to the Secretary seeking concurrence, which would verify further that Satisfactory Arrangements have been made for transport infrastructure in relation to the proposed development.
Clause 30 – Control relating to miscellaneous permissible uses	Not applicable to the proposed development
Clause 31 – Design principles	The proposed development incorporates the following design principles, as they apply to Clause 31 of WSEA SEPP, including: ▪ the development is of a high quality design – refer to **Section 6.1.7** of this EIS ▪ a variety of materials and external finishes for the external facades are incorporated – refer to **Section 6.1.7** of this EIS ▪ high quality landscaping is provided – refer to **Section 6.1.7** of this EIS ▪ the scale and character of the development is compatible with other employment-generating development in the precinct concerned – refer to **Section 6.1.2** of this EIS
Clause 32 – Preservation of Trees or Vegetation	No vegetation clearing will be required to facilitate the proposed development.
Clause 33A – Development near zone boundaries	Not applicable to the proposed development.
Clause 33B – Development of land within or adjacent	The subject site is not located in areas marked as "Transport Investigation Areas A and B" on the Land Zoning Map. Hence, further consideration is not warranted under Clause 33B.

TABLE 14: DEVELOPMENT STANDARDS - WESA SEPP	
Clause	**Comment**
to transport investigation area	
Clause 33C – Development within the Mamre Road Precinct	The subject site is within Precinct 13, therefore Clause 33C does not apply to the proposed development.
Clause 33D – Development in areas subject to aircraft noise	It is noted that the site is located approximately 13km from the Western Sydney International (Nancy-Bird Walton) Airport (the Airport) and is identified to be located on land in Australian Noise Exposure Concept (ANEC) contour of less than 20 as indicated by the Noise modelling tool published by the Department of Infrastructure, Transport, Regional Development and Communications. Notwithstanding, a Noise and Vibration Impact Assessment has been prepared by Renzo Tonin and included within **Appendix 23** of this EIS.
Clause 33E – Airspace operations	The proposed development does not penetrate the prescribed airspace. Prescribed airspace is defined as any area above the obstacle limitation surface (OLS). The OLS level for the subject site is 230.5m RL. The proposal development has a maximum building RL of approximately 65.25m.
Clause 33F – Development of land adjacent to Airport	Not applicable to the proposed development.
Clause 33G – Water recycling and conservation	There are no recycled water services available at or near the development site, therefore no recycled water connection is proposed as part of the development.
Clause 33H – Earthworks	The proposal involves minor earthworks to be undertaken at the site. The proposed earthworks are considered to comply with the requirements of Clause 33H – refer to **Appendix 14** of this EIS.
Clause 33I – Development on flood prone land	The subject site is not affected by mainstream flooding – refer to **Section 6.1.10** and **Appendix 14** of this EIS.
Clause 33J – Heritage conservation	The subject site is not identified to contain or located in proximity to a heritage item.
Clause 33K – Consent for clearing native vegetation	The site does not comprise biodiversity values nor does it proposed the clearing of vegetation.
Clause 33L – Stormwater, water quality and water sensitive design	Compliance with Clause 33L is demonstrated in **Section 6.1.10** of this EIS.

4.3.8 State Environmental Planning Policy No. 33 – Hazardous and Offensive Development

The proposed development requires the storage of a number DGs to facilitate the SBA operations. This involves the storage and handling of Class 2.1 Flammable Gases, Class 2.2 Non-flammable Non-toxic Gases, Class 8 Corrosive Substances and Combustible Liquids. A review of the quantity of goods to be stored indicates the site would exceed the limits listed in SEPP 33, which requires the risks associated with a facility storing DGs to be assessed in the form of a PHA to determine whether there is the potential for offsite impacts.

Riskcon Engineering has been commissioned to prepare a PHA for the facility, as contained within **Appendix 18** of this EIS.

A hazard identification table was developed for the warehouse facility to identify potential hazards that may be present at the site as a result of operations or storage of materials. Based on the identified hazards, scenarios were postulated that may result in an incident with a potential for offsite impacts. Postulated scenarios were discussed qualitatively and any scenarios that would not impact offsite were

eliminated from further assessment. Scenarios not eliminated were then carried forward for consequence analysis.

Incidents carried forward for consequence analysis were assessed in detail to estimate the impact distances. Impact distances were developed into scenario contours and overlaid onto the site layout diagram to determine if an offsite impact would occur. The consequence analysis showed that a full warehouse fire had the potential to impact offsite both through radiant heat and toxic smoke emission. Hence, these scenarios were carried forward for frequency analysis and risk assessment.

The frequency analysis and risk assessment showed that the incidents carried forward would have a fatality risk of 7.06 chances per million per year (pmpy) at the site boundary, with lesser risk at further distances from the boundary. HIPAP No. 4 (Ref. [3]) publishes acceptable risk criteria at the site boundary of 50 pmpy (for industrial sites). Therefore, the probability of a fatality at the site boundary is within the acceptable risk criteria.

In addition, incidents exceeding 23 kW/m^2 heat radiation or 7 kPa explosion overpressure were reviewed which indicated that the contours from such incidents would not impact any structures and thus propagation incidents would be not expected to occur.

Based on the analysis conducted, it is concluded that the risks at the site boundary are not considered to exceed the acceptable risk criteria; hence, the facility would only be classified as potentially hazardous and would be permitted within the current land zoning for the site.

Notwithstanding the above, the following recommendations have been made:

- The warehouse and/or site boundaries shall be capable of containing 612 m^3 which may be contained within the warehouse footprint, site stormwater pipework and any recessed docks or other containment areas that may be present as part of the site design.
- The civil engineers designing the site containment shall demonstrate that the design is capable of containing at least 612 m^3.
- A stormwater isolation point (i.e. penstock isolation valve) shall be incorporated into the design. The penstock shall automatically isolate the storm water system upon the detection of a fire (smoke or sprinkler activation) to prevent potentially contaminated liquids from entering the water course.
- A reassessment of the site facility risk contours shall be conducted in the form of a Final Hazard Analysis (FHA) once the final design has been completed prior to construction of the DG related elements of the design.

4.3.9 State Environmental Planning Policy No. 55 – Remediation of Land

Under the provisions of *State Environmental Planning Policy No. 55 – Remediation of Land* (SEPP 55), where a development application is made concerning land that is contaminated, the consent authority must not grant consent 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 would 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 would be remediated before the land is used for that purpose.

An Environmental Site Assessment (20 April 2021) has been prepared by JBS&G (**Appendix 10**) to investigate and document the potential contamination of the subject site, assess the suitability of the site for the proposed use (or make recommendations to enable such a use to occur).

Based on the findings of their investigations, JBS&G have concluded the following:

- The site has historically been used for agricultural and rural residential purposes.
- The potential sources of contamination at the site included historic filling for site levelling purposes, use of the site for agricultural purposes and former structures potentially containing hazardous materials.

- Fill material was encountered at all sampling locations ranging in depth from 1.3-2.9 m bgs. The fill generally comprised gravelly silty clay of low plasticity with minimal anthropogenic inclusions. The fill material was underlain by natural brown and red silty clay of high plasticity to the maximum depth (11.5 m bgs) of the investigation.
- Representative samples of fill material and natural soils from the site were analysed for a range of identified potential contaminants of concern including heavy metals, PAHs, TRH, BTEX, OCP/PCBs and asbestos. The reported concentrations of all contaminants were below the adopted criteria applicable to commercial / industrial land-use.
- Based on the findings of this investigation and subject to the limitations presented in Section 10 of the Environmental Site Assessment, it is considered that the site is suitable for the proposed commercial land-use (HIL-D).

It is recommended during site redevelopment works a Construction Environmental Management Plan (CEMP) should be implemented which identifies typical site management controls and makes provisions for unexpected finds. This recommendation has been included within the management and mitigation measures outlined in **PART G** of this EIS.

4.4 STRATEGIC PLANNING CONTEXT

4.4.1 Greater Sydney Region Plan – A Metropolis of Three Cities

The *Greater Sydney Region Plan – A Metropolis of Three Cities* divides the Sydney Region into three (3) Cities, with a vision of growth until 2056. The Plan aims to anticipate the housing and employment needs of a growing and vastly changing population. The overall vision pursues an objective of transforming 'Greater Sydney' into a Metropolis of Three Cities, including:

- The Western Parkland City;
- The Central River City; and
- The Eastern Harbour City.

The division into three cities puts workers and the wider community closer to an array of characteristics such as, intensive jobs, 'city-scale' infrastructure and services, entertainment and cultural facilities. By managing and retaining industrial land close to city centres and transport, this will ensure critical and essential services are readily available to support local businesses and community members and residents. Once constructed and operational, the subject site would achieve economic growth and prosperity, as well as encourage employment-generating opportunities within an area zoned for such permissible purposes, that is considered relatively close in conjunction to residential communities, providing an ease of commute. The proposed development across the site considers the employment-generating outcomes that can be achieved for the immediate and wider localities.

The proposed development also contributes to the four (4) standardised elements communicated across for all three (3) cities, including:

- Infrastructure and collaboration – the proposed development of the site for the purposes of a manufacturing facility, would facilitate the provision of services to support the warehouse and logistics uses immediately adjoining the site;
- Liveability – the proposed development encourages employment-generating opportunities and economic prosperity, which has positive influences on the wider locality;
- Productivity – the proposed development is situated within the *Western City District Plan* (refer to **Section 5.3** below); and,
- Sustainability – the proposed development would not exhibit or emit any detrimental impacts to its wider ecological surroundings.

In summary, the subject site and proposed development contributes to the objectives set out in the *Greater Sydney Region Plan – A Metropolis of Three Cities* by promoting minor environmental impacts and the further promotion of employment-generating opportunities to the wider locality and community, positioned within the Penrith LGA.

4.4.2 Western City District Plan

The subject site forms part of the Western City District, as identified in **Figure 16** below and is subject to the provisions of the *Western City District Plan*.

The *Western City District Plan* covers the Western Parkland City area, including the Penrith LGA in which the subject site is located. The Plan sets out a twenty-year vision to help achieve the goals contained in *A Metropolis of Three Cities* – the GSC vision for developing Sydney as a world-class future city. The Plan agglomerates City, Regional and Local planning. The site is situated within the Western City District, which falls within the Western Parkland City.

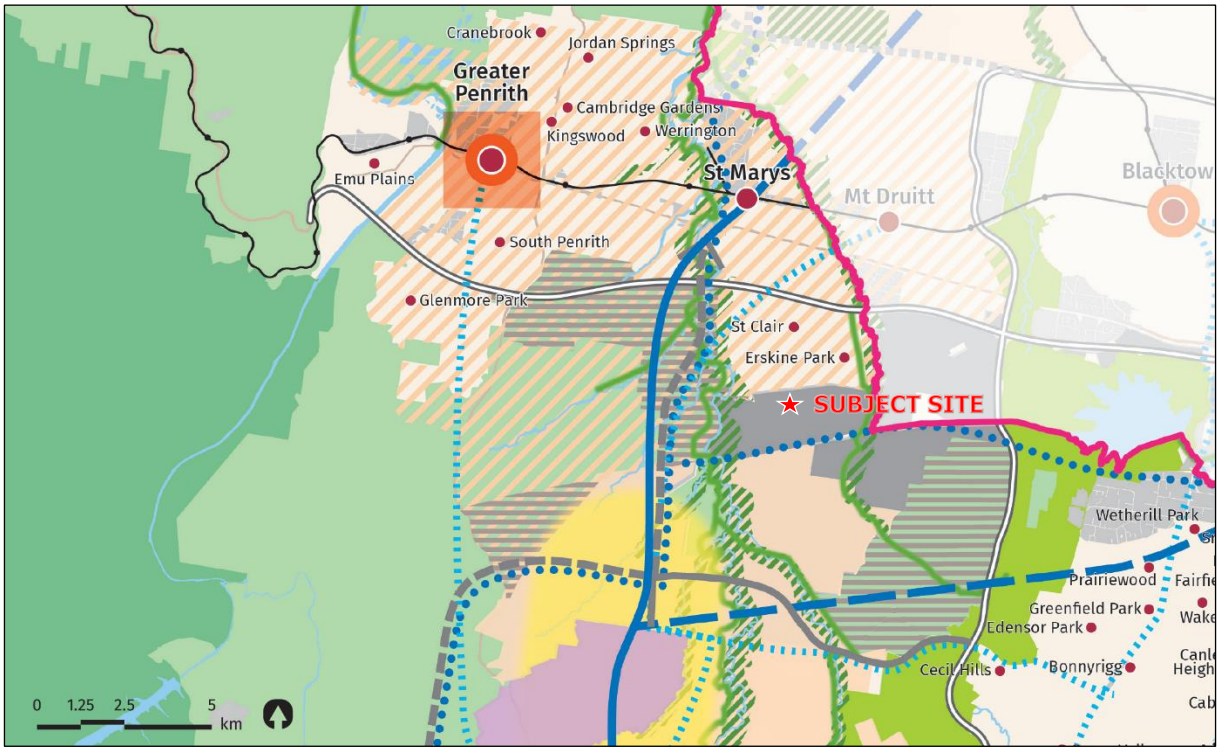


Figure 16 **Structure Plan for the Western City District Plan** (Source: Greater Sydney Commission, 2018)

The *Western City District Plan* reinforces the four (4) planning priorities of the GSC. The Plan establishes a number of priorities and actions to guide growth, development and change. It also emphasises connectivity to infrastructure, collaboration, liveability, productivity and sustainability. The GSC's mission statement further reinforces the Plan's concentrated aims by outlining its main strategies, namely:

- *Creating a once-in-a-generation economic boom with the Western Sydney Airport and Badgerys Creek Aerotropolis bringing together infrastructure, businesses and knowledge intensive jobs;*
- *Building on the Western Sydney City Deal to transform the Western City District over the next 20 to 40 years by building on natural and community assets and developing a more contained Western City District with a greater choice of jobs, transport and services aligned with growth;*
- *Delivering the first stage of the North South Rail Link;*
- *Collaborating and building strong relationships between Liverpool, Greater Penrith and Campbelltown-Macarthur reinforced by the emerging Badgerys Creek Aerotropolis forming a unique metropolitan cluster;*
- *Providing major transport links for people and freight by unprecedented transport investments;*
- *Developing a range of housing, providing access to public transport and infrastructure including schools, hospitals and community facilities;*
- *Linking walking and cycling paths, bushland and a green urban landscape framed by the Greater Blue Mountains World Heritage Area, the Scenic Hills and Western Sydney Parklands;*

- *Enhancing and protecting South Creek, Georges River and Hawkesbury-Nepean river systems;*
- *Mitigating the heat island effect and providing cooler places by extending urban tree canopy and retaining water in the landscape;*
- *Protecting the District's natural landscapes, heritage and tourism assets, unique rural areas and villages; and,*
- *Protecting the environmental, social and economic values of the Metropolitan Rural Area.*

The proposed development, would contribute to the objectives set out in the *Western City District Plan* (of which the site forms a part), by promoting a greater range of land uses of benefit to the community, including the proposed development (manufacturing) and other associated land uses; facilitating the provision of greater and improved infrastructure; and promoting additional employment-generating opportunities, to the wider locality and community closer to home, whilst supporting economically and environmentally-sustainable development. These aims are specifically relevant to the proposed development.

4.4.3 Western Sydney Employment Area

The subject site is located within the southwestern portion of the WSEA, within 'Precinct 13 (Mamre West)'. The aims / objectives of the WSEA are summarised below, including:

- Promoting an economically sustainable development and reinforcing the status of an employment-generating development, that positively contributes to the WSEA;
- Encourages assurance for the coordinated planning and development of land within the WSEA;
- Ensures minimal environmental and amenity impacts – **PART F** of this EIS accurately considers potential environmental parameters which will be considered within the ensuing EIS for the proposed development; and
- Ensures development is compatible with surrounding development and the local context.

As outlined in **Section 4.3.7** of this EIS, the proposed development is considered to meet these objectives, as it enables development on land zoned for such permissible industrial-related uses.

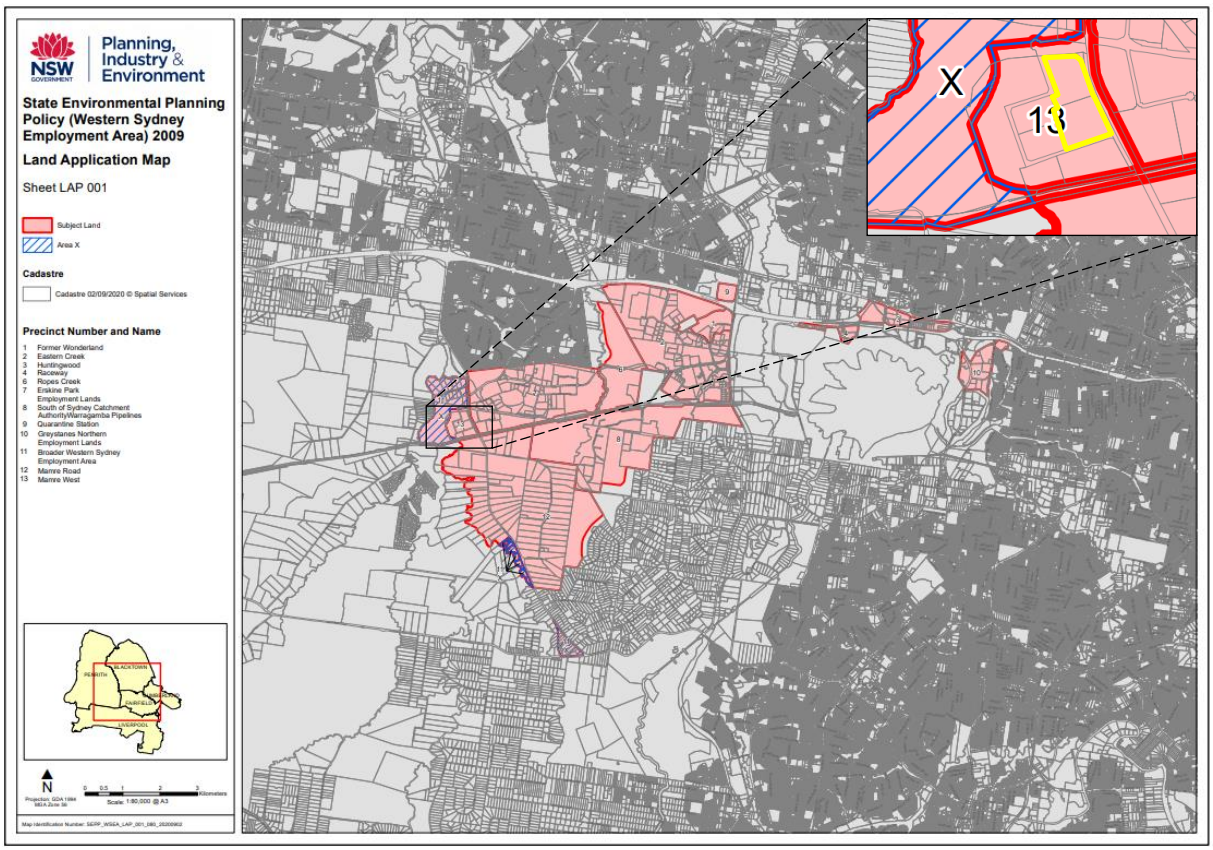


Figure 17 **WSEA SEPP Land Application Map** (Source: NSW Government, 2020)

4.4.4 Future Transport Strategy 2056

The Future Transport Strategy 2056 is a 40 year strategy, supported by plans for regional NSW and for Greater Sydney. The strategy and plans focus on the role of transport in delivering movement and place outcomes that support the character of the places and communities we want for the future.

The proposed development aligns with the strategies of Future Transport on the following basis:

- the site has access to regular public transport services;
- the site is accessible by active transport;
- a travel demand management approach is proposed through implementation of a work place travel plan;
- parking provision is appropriate;
- access, servicing and internal layout will be provided in accordance with Australian Standards AS2890.1-2004 and AS2890.2-2018;
- the surrounding road network and intersections will be able to cater for the proposed development traffic.

4.5 LOCAL PLANNING CONTEXT

4.5.1 Penrith Local Environmental Plan 2010

Penrith Local Environmental Plan 2010 (PLEP2010) is not applicable to the land as the provisions of WSEA SEPP apply.

4.5.2 Penrith Development Control Plan 2014

The *Penrith Development Control Plan 2014* (PDCP2014) provides a non-statutory instrument to guide development in the Penrith LGA.

However, Section 1.4 of the *Mamre West Land Investigation Area Development Control Plan 2016* (Mamre West DCP) outlines that the PDCP2014 does not apply to land within the WSEA SEPP. The land use provisions and development standards within the WSEA SEPP and the detailed development controls within this DCP comprise the principal planning provisions relevant to the development of the Mamre West Land Investigation Area.

4.5.3 Mamre West Land Investigation Area Development Control Plan 2016

The Mamre West DCP applies to land within the Mamre West Land Investigation Area that has been released and zoned IN1 General Industrial under the provisions of the WSEA SEPP. The proposed development has been designed to comply with the controls specified in the Mamre West DCP.

The consultation process of this proposal has also involved a number of dealings with Council, from which the design has been revised and further embellished. Reference should be made to **Section 5.2.1** of this EIS, which outlines such consultation and design iterations.

PART E CONSULTATION

5.1 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

An application to receive SEARs was submitted to DPIE, with the SEARs (reference: SSD-18204994) subsequently issued on 27 May 2021.

A copy of the issued SEARs is included in **Appendix 1**.

During the preparation of the SEARs, the DPIE also consulted with key stakeholders, and in the process obtained a list of their Key Issues for the proponent(s) to assess throughout this EIS. These Key Issues for assessment are contained in the subsequent sections.

5.1.1 EPA – Key Issues

TABLE 15: EPA – KEY ISSUES	
Requirements	**Satisfied by**
General Requirements	
N/A	**N/A**
Key Issues	
Air quality impacts	
The assessment should include a detailed Air Quality Impact Assessment (AQIA) for construction and operation of the project in accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW. *The AQIA should:* ▪ *demonstrate how the development will comply with the relevant regulatory framework, specifically the POEO Act and the POEO (Clean Air) Regulation (2010); and* ▪ *include a cumulative local and regional air quality impact assessment, including odour.*	An AQIA has been prepared by Northstair Air Quality, and forms **Appendix 22** of this EIS.
Water quality impacts	
The assessment should demonstrate that: ▪ *all practical options to avoid discharge have been investigated and implemented, and* ▪ *measures have been taken to reduce the level of contaminants in the discharge, so that any impact is reduced where a discharge is necessary.*	Reference should be made to **Section 6.1.10**, and the Stormwater Report prepared by Henry & Hymas Consulting Engineers, contained within **Appendix 14** of this EIS.
Applicants must: ▪ *identify and estimate the quality and quantity of all pollutants that may be introduced into the water cycle by source and discharge point* ▪ *describe the nature and degree of impact that any discharge(s) will have on the receiving environment. This includes consideration of all pollutants that pose a risk of non-trivial harm to human health and the environment (this should also include intercepted saline groundwater or acidic runoff generated by acid sulphate soil where appropriate).*	All the drains internal to the facility, associated with the manufacturing process will be captured and treated by the proposed wastewater treatment plant on site, this includes any lab sinks. All external drains that are designed to capture spills with raw material unloading and wash down will also be captured and treated through the wastewater treatment plant. Currently Sydney Water are finalising the "consent to discharge" requirements but the wastewater treatment plant will be designed to achieve this ongoing requirement.

TABLE 15: EPA – KEY ISSUES	
Requirements	**Satisfied by**
▪ *demonstrate assessment against the ambient NSW Water Quality Objectives and environmental values for the receiving waters relevant to the infrastructure activity. This includes the indicators and associated trigger values or criteria for the identified environmental values (this information should be sourced from the ANZECC (2000) criteria)* ▪ *assess the significance of any identified impacts, including consideration of the relevant environmental values and ambient water quality outcomes. Assessment of discharges to surface waters should be guided by the ANZECC (2000) guidelines, using local Water Quality Objectives.*	
Noise impacts	
The impact of noise and vibration to protect the amenity and wellbeing of the community must be managed. Potential impacts should be minimised through the implementation of all feasible and reasonable mitigation measures.	A Noise Emission Assessment has been prepared by Renzo Tonin, which forms **Appendix 23** of this EIS.
Waste generation and management	
Different assessment requirements apply based on the type of facility (that is landfills, alternative waste treatment plants, liquid waste treatment plants, waste recovery facilities, building demolition waste processing yards, scrap metal yards, waste processing, waste fuel production, energy recovery facilities and in the context of Resource Recovery Orders and Exemptions). The waste transported, generated, or received as part of carrying out the activity should be minimised and managed in a way that protects all environmental values.	A Waste Management Plan has been prepared by SLR Consulting, which forms **Appendix 25** of this EIS.
Contaminated sites	
An assessment should determine whether the land is likely to be contaminated and identify if remediation of the land is required. This assessment should have regard to the ecological and human health risks posed by the contamination in the context of past, existing and future land uses. Contaminated groundwater may also harm human health, the environment and the types of land uses that may safely be carried out on a contaminated site. Assessments should consider contamination in both land and groundwater.	An Environmental Site Assessment, prepared by JBS&G, which confirms the suitability of the subject site for the proposed use. JBS&G have reported that concentrations of all contaminants were below the adopted criteria applicable to commercial/ industrial land use. Reference should be made to **Appendix 10** of this EIS for further detail.
Dangerous goods, hazardous substances and chemical waste	
The assessment should demonstrate: ▪ *how materials and wastes containing scheduled chemical wastes and other waste subject to a chemical control order (CCO) will be managed in accordance with a CCO and relevant National Management Plans.* ▪ *how the requirements of the Radiation Control Act 1990 and the Radiation Control Regulation 2013 will be met.*	Advice from SBA confirms that the existing SBA operations at Smithfield and Blacktown are not subject to a CCO, nor does the proposed facility fit within any of the five (5) categories requiring a CCO.
Plans and Documents	

TABLE 15: EPA – KEY ISSUES	
Requirements	**Satisfied by**
N/A	**N/A**
Consultation	
N/A	**N/A**

5.1.2 TfNSW – Key Issues

TABLE 16: TFNSW – KEY ISSUES	
Requirements	**Satisfied by**
General Requirements	
N/A	**N/A**
Key Issues	
Transport and accessibility	
1. *Details of all traffic types and volumes likely to be generated by the proposed development during construction and operation, including a description of haul route origins and destinations, including:*	A robust Transport Assessment has been prepared by Ason Group and forms part of **Appendix 17** of this EIS.
a. *Daily inbound and outbound vehicle traffic profile by time of day and day of week (if travel patterns differ across the week);*	Estimated daily inbound and outbound vehicle traffic profile have been provided in **Appendix 17** of this EIS, for both normal operational period and seasonal peak period.
b. *Site and traffic management plan on how to manage number of vehicles likely to be generated during construction and operation and awaiting loading, unloading or servicing can be accommodated on the site to avoid queuing in the surrounding road network*	Detailed site access arrangements and an indicative Heavy Vehicle Movement Strategy Plan is provided within the Transport Assessment (**Appendix 17**), which demonstrates that operational truck movements can be sufficiently accommodated on-site with the proposed site plans. Additionally, a detailed Construction Traffic Management Plan (CTMP) can be prepared in response to a suitable condition of consent for this SSD which can readily be completed as part of the CC stage.
c. *Detailed plan of proposed layout of internal road network to demonstrate that the site will be able to accommodate the most productive vehicle types and parking on site in accordance with the relevant Australian Standard and Council's Development Control Plan;*	Details regarding the on-site design of the subject site and swept path analysis form part of the Transport Assessment contained within **Appendix 17** of this EIS.
d. *Plans detailing how the proposed development connects to adjoining sites to facilitate their future development for their intended purposes;*	Reference should be made to the Architectural Plans contained within **Appendix 5** of this EIS.
e. *Swept path diagrams to demonstrate vehicles entering, exiting and manoeuvring throughout the site;*	Swept path analysis demonstrating vehicles entering, exiting and manoeuvring throughout the site are included in the Transport Assessment contained within **Appendix 17** of this EIS.

TABLE 16: TFNSW – KEY ISSUES	
Requirements	**Satisfied by**
f. An assessment of the forecast impacts on traffic volume generated on road safety and capacity of road network including consideration of cumulative traffic impacts at key intersections using SIDRA or similar traffic model as prescribed by TfNSW (former Roads and Maritime). The traffic modelling should consider the scenarios of year 2026, 2031, 2036. These should include, but not be limited to: *i. Mamre Road at Bakers Lane;* *ii. Mamre Road at Distribution Drive;* *iii. Mamre Road at James Erskin Drive; and* *iv. Mamre Road at Erskine Park Road.*	As discussed in the Transport Assessment, **Appendix 17** of this EIS, the estimated operational traffic generation of the subject site (Lot 10 and Lot 11) are generally consistent with the approved traffic generation thresholds for Lot 10 and Lot 11 under the approved First Estate Master Plan and are expected to have immaterial impacts to the surrounding road network and therefore does not warrant further SIDRA modelling assessments. Furthermore, it is noted that the future format of these intersections has been discussed as part of the approved Kemps Creek SSD (SSD-9522) which covers for the approved developments and background traffic growth at these intersections. Ultimately, it is suggested that the broader Mamre Road Precinct study now being completed would deal with the performance of some of these intersections. It is noted that Ason Group has discussed this methodology with NSW DPIE and they have subsequently approved this methodology that SIDRA modelling is not required as part of this SSD approval.
g. To ensure that the above requirements are fully addressed, an assessment of the predicted impacts of this traffic on road safety and the capacity of the road network, including consideration of cumulative traffic impacts at key intersections using SIDRA or similar traffic model. This is to include the identification and consideration of approved and proposed developments/planning proposals/road upgrades in the vicinity. The assessment needs to consider the impact on Mamre Road for the duration of the works because traffic growth in this area is expected to increase more quickly than standard growth rates;	Previous SIDRA modelling as part of the planning for the overall First Estate Precinct concluded that the interim access arrangements to Mamre Road (prior to the upgrade of Mamre Road and James Erskine Drive to four legs) will operate with a Level of Service B during both peak periods – considered good operation in accordance with TfNSW approved intersection performance criteria. Therefore, it is expected that there is sufficient spare capacity within the existing and planned intersection designs to accommodate the traffic volumes generated by the proposal without causing any adverse impacts to the road network operations.
h. details of road upgrades, infrastructure works, or new roads or access points required for the development;	On the basis of the above, it is anticipated that the road network would be more than adequate to cater for the traffic generated by the proposal. Accordingly, Ason Group consider that no further road upgrades are required to support the proposed development.

TABLE 16: TFNSW – KEY ISSUES	
Requirements	**Satisfied by**
i. details of travel demand management measures to minimise the impact on general traffic and bus operations, including details of a location-specific sustainable travel plan (Green Travel Plan and specific Workplace Travel Plan) and the provision of facilities to increase the non-car mode share for travel to and from the site;	A detailed Workplace Travel Plan (WTP) can be prepared in response to a suitable condition of consent for this SSD.
j. details of the adequacy of existing public transport or any future public transport infrastructure within the vicinity of the site, pedestrian and bicycle networks and associated infrastructure to meet the likely future demand for the proposed development; and	The subject site's accessibility to existing public / active transport network and future bus service opportunities are demonstrated within the Transport Assessment contained in **Appendix 17** of this EIS.
k. measures to integrate the development with the existing/future public transport network.	The subject site's accessibility to existing public / active transport network and future bus service opportunities are demonstrated within the Transport Assessment contained in **Appendix 17** of this EIS.
l. The preparation of a preliminary Construction Pedestrian and Traffic Management Plan (CPTMP) to demonstrate the proposed management of the impact in relation to construction traffic addressing the following: *i. assessment of cumulative impacts associated with other construction activities (if any);* *ii. an assessment of road safety at key intersection and locations subject to heavy vehicle construction traffic movements and high pedestrian activity;* *iii. details of construction program detailing the anticipated construction duration and highlighting significant and milestone stages and events during the construction process;* *iv. details of anticipated peak hour and daily construction vehicle movements to and from the site;* *v. details of on-site car parking and access arrangements of construction vehicles, construction workers to and from the site, emergency vehicles and service vehicle;* *vi. details of temporary cycling and pedestrian access during construction.*	It should be noted that the construction programme for the development has not yet been finalised. Notwithstanding, a preliminary CTMP has been provided as part of the First Estate Masterplan (SSD-7173), which outlines general principles for managing construction traffic and provides an understanding of the likely traffic impacts during the construction period entire estate. Furthermore, a detailed CTMP can be prepared in response to a suitable condition of consent for this SSD which can readily be completed as part of the CC stage.
2. Traffic Counts: *TfNSW requests that any counts undertaken are not within close proximity to the school holidays/long weekend. Counts undertaken within close proximity to these events may not indicate normal traffic conditions. Ideally vehicle counts should be undertaken during a typical day, to include Thursday (or Wednesday) and Friday for the study (not near school/public holidays). This will provide the departments with an accurate understanding of the existing traffic conditions and the actual impact of this development application to the surrounding network.*	Noted – no traffic count surveys were undertaken as part of this assessment.

TABLE 16: TFNSW – KEY ISSUES	
Requirements	**Satisfied by**
Should the date of the counts be within a week either side of the above events, it will be recommended that new counts are undertaken at more appropriate dates and are to include a breakdown of light and heavy vehicles.	
Flooding	
The EIS shall: *Provide a flood impact assessment to understand the potential impacts of the development on flood evacuation is to be carried out. To assess the impacts of the proposed development, information for pre and post-development scenarios including modelling of the local overland flows are to be provided to allow assessment of the impact of the development.*	The subject site is not affected by mainstream flooding. Detailed flood modelling for the entire First Estate subdivision was undertaken by Costin Roe Consulting Engineers, which accompanied the original SSD application (SSD-7173).
Plans and Documents	
N/A	**N/A**
Consultation	
During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners. In particular you must consult with: ▪ *Transport for NSW*	Refer to **Section 5.2.1** of this EIS.

5.1.3 EES – Key Issues

TABLE 17: EES – KEY ISSUES	
Requirements	**Satisfied by**
General Requirements	
N/A	**N/A**
Key Issues	
Biodiversity:	
Biodiversity impacts related to the proposed development are to be assessed in accordance *with Section 7.9 of the Biodiversity Conservation Act 2017 the Biodiversity Assessment Method and documented in a Biodiversity Development Assessment Report (BDAR). The BDAR must include information in the form detailed in the Biodiversity Conservation Act 2016 (s6.12), Biodiversity Conservation Regulation 2017 (s6.8) and Biodiversity Assessment Method, including an assessment of the impacts of the proposal (including an assessment of impacts prescribed by the regulations).*	A BDAR wavier under section 7.9 of the *Biodiversity Conservation Act 2016* (BC Act) is sought.
The BDAR must document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the Biodiversity Assessment Method.	A BDAR wavier under section 7.9 of the *Biodiversity Conservation Act 2016* (BC Act) is sought.
The BDAR must include details of the measures proposed to address the offset obligation as follows: ▪ *The total number and classes of biodiversity credits required to be retired for the development/project;* ▪ *The number and classes of like-for-like biodiversity credits proposed to be retired;*	A BDAR wavier under section 7.9 of the *Biodiversity Conservation Act 2016* (BC Act) is sought.

TABLE 17: EES – KEY ISSUES	
Requirements	**Satisfied by**
▪ *The number and classes of biodiversity credits proposed to be retired in accordance with the variation rules;* ▪ *Any proposal to fund a biodiversity conservation action;* ▪ *Any proposal to conduct ecological rehabilitation (if a mining project);* ▪ *Any proposal to make a payment to the Biodiversity Conservation Fund.* *If seeking approval to use the variation rules, the BDAR must contain details of the reasonable steps that have been taken to obtain requisite like-for-like biodiversity credits.*	
The BDAR must be submitted with all spatial data associated with the survey and assessment as per Appendix 11 of the BAM.	A BDAR wavier under section 7.9 of the *Biodiversity Conservation Act 2016* (BC Act) is sought.
The BDAR must be prepared by a person accredited in accordance with the Accreditation Scheme for the Application of the Biodiversity Assessment Method Order 2017 under s6.10 of the Biodiversity Conservation Act 2016.	A BDAR wavier under section 7.9 of the *Biodiversity Conservation Act 2016* (BC Act) is sought.
Water and soils	
The EIS must map the following features relevant to water and soils including: *a. Acid sulfate soils (Class 1, 2, 3 or 4 on the Acid Sulfate Soil Planning Map).* *b. Rivers, streams, wetlands, estuaries (as described in s4.2 of the Biodiversity Assessment Method)* *c. Wetlands as described in s4.2 of the Biodiversity Assessment Method* *d. Groundwater* *e. Groundwater dependent ecosystems* *f. Proposed intake and discharge locations.*	Reference should be made the following technical reports: ▪ Environmental Assessment Report (**Appendix 10**) ▪ Biodiversity Assessment Report (**Appendix 12**) ▪ Stormwater Report (**Appendix 14**)
The EIS must describe background conditions for any water resource likely to be affected by the development, including: *a. Existing surface and groundwater* *b. Hydrology, including volume, frequency and quality of discharges at proposed intake and discharge locations* *c. Water Quality Objectives (as endorsed by the NSW Government http://www.environment.nsw.gov.au/ieo/index.htm) including groundwater as appropriate that represent the community's uses and values for the receiving waters* *d. Indicators and trigger values/criteria for the environmental values identified at (c) in accordance with the ANZECC (2000) Guidelines for Fresh and Marine Water Quality and/or local objectives, criteria or targets endorsed by the NSW Government*	Reference should be made to the Stormwater Report prepared by Henry & Hymas Consulting Engineers, which forms part of **Appendix 14**, as well as **Section 6.1.10** of this EIS.

TABLE 17: EES – KEY ISSUES	
Requirements	**Satisfied by**
e. *Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions http://www.environment.nsw.gov.au/research-andpublications/publications-search/risk-based-framework-for-considering-waterwayhealth-outcomes-in-strategic-land-use-planning.*	
The EIS must assess the impact of the development on hydrology, including: a. *Water balance including quantity, quality and source.* b. *Effects to downstream rivers, wetlands, estuaries, marine waters and floodplain areas.* c. *Effects to downstream water-dependent fauna and flora including groundwater dependent ecosystems.* d. *Impacts to natural processes and functions within rivers, wetlands, estuaries and floodplains that affect river system and landscape health such as nutrient flow, aquatic connectivity and access to habitat for spawning and refuge (e.g. river benches).* e. *Changes to environmental water availability, both regulated/licensed and unregulated/rules-based sources of such water.* f. *Mitigating effects of proposed stormwater and wastewater management during and after construction on hydrological attributes such as volumes, flow rates, management methods and re-use options.* g. *Identification of proposed monitoring of hydrological attributes.*	Reference should be made to the Stormwater Report prepared by Henry & Hymas Consulting Engineers, which forms part of **Appendix 14**, as well as **Section 6.1.10** of this EIS.
Flooding and coastal hazards:	
The EIS must map the following features relevant to flooding as described in the Floodplain Development Manual 2005 (NSW Government 2005) including: a. *Flood prone land.* b. *Flood planning area, the area below the flood planning level.* c. *Hydraulic categorisation (floodways and flood storage areas)* d. *Flood Hazard.*	The subject site is not affected by mainstream flooding. Detailed flood modelling for the entire First Estate subdivision was undertaken by Costin Roe Consulting Engineers, which accompanied the original SSD application (SSD-7173).
The EIS must describe flood assessment and modelling undertaken in determining the design flood levels for events, including a minimum of the 5% Annual Exceedance Probability (AEP), 1% AEP, flood levels and the probable maximum flood, or an equivalent extreme event.	The subject site is not affected by mainstream flooding. Detailed flood modelling for the entire First Estate subdivision was undertaken by Costin Roe Consulting Engineers, which accompanied the original SSD application (SSD-7173).
The EIS must model the effect of the proposed development (including fill) on the flood behaviour under the following scenarios: a. *Current flood behaviour for a range of design events as identified in 14 above. This includes the 0.5% and 0.2% AEP year flood events as proxies for assessing*	The subject site is not affected by mainstream flooding. Detailed flood modelling for the entire First Estate subdivision was undertaken by Costin Roe Consulting Engineers,

TABLE 17: EES – KEY ISSUES	
Requirements	**Satisfied by**
sensitivity to an increase in rainfall intensity of flood producing rainfall events due to climate change.	which accompanied the original SSD application (SSD-7173).
Modelling in the EIS must consider and document: *a. Existing council flood studies in the area and examine consistency to the flood behaviour documented in these studies.* *b. The impact on existing flood behaviour for a full range of flood events including up to the probable maximum flood, or an equivalent extreme flood.* *c. Impacts of the development on flood behaviour resulting in detrimental changes in potential flood affection of other developments or land. This may include redirection of flow, flow velocities, flood levels, hazard categories and hydraulic categories* *d. Relevant provisions of the NSW Floodplain Development Manual 2005.*	The subject site is not affected by mainstream flooding. Detailed flood modelling for the entire First Estate subdivision was undertaken by Costin Roe Consulting Engineers, which accompanied the original SSD application (SSD-7173).
The EIS must assess the impacts on the proposed development on flood behaviour, *including:* *a. Whether there will be detrimental increases in the potential flood affectation of other properties, assets and infrastructure.* *b. Consistency with Council floodplain risk management plans.* *c. Consistency with any Rural Floodplain Management Plans.* *d. Compatibility with the flood hazard of the land.* *e. Compatibility with the hydraulic functions of flow conveyance in floodways and storage in flood storage areas of the land.* *f. Whether there will be adverse effect to beneficial inundation of the floodplain environment, on, adjacent to or downstream of the site.* *g. Whether there will be direct or indirect increase in erosion, siltation, destruction of riparian vegetation or a reduction in the stability of riverbanks or watercourses.* *h. Any impacts the development may have upon existing community emergency management arrangements for flooding. These matters are to be discussed with the NSW SES and Council.* *i. Whether the proposal incorporates specific measures to manage risk to life from flood. These matters are to be discussed with the NSW SES and Council.* *j. Emergency management, evacuation and access, and contingency measures for the development considering the full range or flood risk (based upon the probable maximum flood or an equivalent extreme flood event). These matters are to be discussed with and have the support of Council and the NSW SES.* *k. Any impacts the development may have on the social and economic costs to the community as consequence of flooding.*	The subject site is not affected by mainstream flooding. Detailed flood modelling for the entire First Estate subdivision was undertaken by Costin Roe Consulting Engineers, which accompanied the original SSD application (SSD-7173). The flood level for the 1% AEP flood event adjacent to the site has been determined to be approximately 32.50 AHD. The proposed FFL of the manufacturing facility is 36.75 AHD, with the lowest part of the site at approximately 34.60 AHD.
Plans and Documents	
N/A	**N/A**

TABLE 17: EES – KEY ISSUES	
Requirements	**Satisfied by**
Consultation	
N/A	**N/A**

5.1.4 Penrith City Council – Key Issues

TABLE 18: PENRITH CITY COUNCIL – KEY ISSUES	
Requirements	**Satisfied by**
General Requirements	
N/A	**N/A**
Key Issues	
Planning	
The critical consideration with this proposal will be the edge conditions and associated landscape design to the public domain. Detailed landscape plans will be required that the support the SSD application and these plans should provide for a layering of canopy tree planting within the site that compliments streetscape planting. Further planting within car parking areas should be undertaken as per Council's DCP requirements and should be of sufficient dimensions to accommodate canopy trees.	Detailed Landscape Plans have been prepared by Geoscapes, as per **Appendix 6** of this EIS.
Engineering	
Stormwater Management ▪ *Stormwater discharge from the site shall comply with Mamre West Land Investigation Area DCP and the water quality and quantity controls approved under the parent subdivision SSD-7173.* ▪ *A water sensitive urban design strategy prepared by a suitably qualified person is to be provided for the site. The strategy shall address water conservation, water quality, water quantity, and operation and maintenance.* ▪ *The application shall include MUSIC modelling (*.sqz file) demonstrating compliance with Section 5.2 of the Mamre West Land Investigation Area DCP.*	Reference should be made to the Stormwater Report prepared by Henry & Hymas Consulting Engineers, which forms part of **Appendix 14**, as well as **Section 6.1.10** of this EIS.
Waterways	
The scoping report indicates that a suitable stormwater management cycle is proposed which includes a Water Sensitive Urban Design (WSUD) strategy capable of achieving the relevant stormwater and pollution reduction targets across the site. Rainwater harvesting should / would also be applied across the site (where considered practical), which will incorporate re-use in irrigation methods and recycled potable water components, i.e. toilet flushing. Councils' waterways team prefers naturally vegetated system such as raingardens instead of cartridge filters. If a raingarden cannot be provided, evidence and justification supporting this outcome must be provided. All proposed WSUD systems must be accompanied by an electronic MUSIC model in sqz format to confirm compliance with councils WSUD policy.	Reference should be made to the Stormwater Report prepared by Henry & Hymas Consulting Engineers, which forms part of **Appendix 14**, as well as **Section 6.1.10** of this EIS.
Environment	

TABLE 18: PENRITH CITY COUNCIL – KEY ISSUES	
Requirements	**Satisfied by**
Food Fit-out Details *It is requested that the applicant provide detailed plans, sections and elevations of food handling and storage areas as part of the SSD lodgement package. The submitted plans and drawings must demonstrate compliance with, AS4674 and Food Safety Standard 3.2.3 Food Premises & Equipment. It is also suggested that the NSW Food Authority be consulted to determine if they would require a referral as the operation of the premises will be regulated by this authority and not Council.*	Detailed fit out plans are provided to NSW DPIE, under separate cover, as they contain confidential information that is the intellectual property (IP) of SBA.
Environment Protection Licence (EPL) – NSW EPA *Schedule 1 of the Protection of the Environment Operations Act 1979 (POEO Act) contains a core list of activities that require a licence before they may be undertaken or carried out. Page 18 of the Scoping Report confirms the need for an EPL with the NSW EPA – "The proposed operations are expected to exceed the general agricultural processing capacity threshold of 30,000 tonnes of agricultural products per year, pursuant to item 2, Part 1 of Schedule 1 of the POEO Act. As such, an environment protection licence (EPL) will be required for the proposed operations". It is suggested that the NSW EPA be consulted to determine if they would like a referral or not as the operation of the premises will be regulated by this authority and not Council.*	Understood and noted.
Noise Impacts *The main source of noise generated by commercial development is from the operation of machinery, loading and unloading, deliveries and equipment. In particular, noise generated from air conditioning, exhaust and refrigeration systems have been major sources of noise complaints received by Council. In this regard. Section C12.4 C of Council's Development Control Plan states: "All development applications where the above controls are relevant are required to provide a Noise Impact Statement prepared by a qualified acoustic consultant in accordance with the requirements set out in the DA Submission Requirements Appendix of this DCP".* *Due to the proposed operation involving 24 hour operation and its proximity to residential receivers, an acoustic assessment is required to be submitted as part of the development application to demonstrate that the proposed development will not have any noise impact on nearby sensitive receivers, including nearby residences and workplaces.* *This Report is to be prepared by a suitably qualified acoustic consultant and is to consider:* ▪ *The 'NSW Noise Policy for Industry' in terms of assessing the noise impacts associated with the development, all noise generating activities on the site (including, but not limited to, use of plant and equipment – air conditioning, cooling towers and condensers, deliveries, traffic and car parking) and the location of nearby workplaces and residents;*	A Noise Emission Assessment has been prepared by Renzo Tonin, contained within **Appendix 23** and further documented within **Section 6.1.4** of this EIS.

TABLE 18: PENRITH CITY COUNCIL – KEY ISSUES	
Requirements	**Satisfied by**
▪ *Given the proposed hours of operation, the acoustic report should also consider the requirements of the NSW EPA's Sleep Disturbance Criteria; and* ▪ *the Interim Construction Noise Guideline in assessing the impacts associated with the construction phase of the development.* *Should mitigation measures be necessary, recommendations should be included to this effect and should be shown on all architectural plans.*	
Air Quality Impacts *Table 5 on page 27 discusses possible air impacts. The Report states: "Potential sources of odour include:* ▪ *Rooftop ventilation units, which draw air from within the facility* ▪ *Fryer exhaust stacks* ▪ *Wastewater treatment plant tanks".* *A formal Air Quality Assessment is required. This documentation would need to specifically consider the development proposed, including the site, location of receivers, scale of operations and processes involved (including those outlined above from the scoping report). The assessment must be prepared by a suitably qualified environmental consultant. This assessment is to consider the relevant NSW Environment Protection Authority (EPA) Guidelines and criteria, including the 'Approved Methods for the Modelling and Assessment of Air Pollutants' and the Protection of the Environment Operations (Clean Air) Regulation 2010, and the location of nearby workplaces and residents.* *It is noted that the scoping report confirms the applicant's intention to complete an Air Quality Assessment – "An Air Quality Impact Assessment Report prepared by a suitably qualified expert would accompany the EIS in accordance with the NSW EPA requirements".*	An AQIA has been prepared by Northstar Air Quality, which is contained within **Appendix 22** and further documented within **Section 6.1.5** of this EIS.
SEPP 55 – Remediation of Land *The application is to address all relevant requirements under State Environmental Planning Policy 55 Remediation of Land (SEPP 55). Council cannot support any development unless these requirements have been satisfied. Should remediation be required this will require development consent by virtue of the overlay of SEPP 55 and SREP 20 provisions in combination. The application is to demonstrate that the land is suitable for the proposed purpose. Any Reports need to be completed by an appropriately qualified person(s) or company. An appropriately qualified person(s) is defined as "a person who, in the opinion of the Council, has a demonstrated experience or access to experience in hydrology, environmental chemistry, soil science, eco-toxicology, sampling and analytical procedures, risk evaluation and remediation technologies.*	Reference should be made to **Section 4.3.9** and the site-specific Environmental Assessment Report contained within **Appendix 10** of this EIS.

TABLE 18: PENRITH CITY COUNCIL – KEY ISSUES	
Requirements	**Satisfied by**
It is noted that page 20 of the submitted Scoping Report states: "A Phase 1 contamination investigation was carried out as part of SSD-7173, which concluded there are no sources of contamination on site, the site is suitable for industrial uses and there is low potential for subsurface contamination. The proposal involves an industrial use for food manufacturing, which is deemed suitable for the subject site". Council is not aware of the date of when the abovementioned report was prepared or the conclusions made in the report. It is therefore recommended that the report be submitted along with further information confirming if there has been any activity at the site since the report was written that has the potential to alter the previous conclusions or recommendations.	
SEPP 33 – Hazardous and Offensive Development *Page 19 of the Scoping Report states: "To facilitate the operational use of the proposed food manufacturing facility, there will be some hazardous substances stored on site. The proposed operations involve the storage of approximately 30kL of Class 8 – Packing Group II, which exceeds the State Environmental Planning Policy No 33 – Hazardous and Offensive Development (SEPP 33) threshold for Class 8 corrosives, as such a Preliminary Hazard Analysis will form part of the EIS". As a result, a Preliminary Hazard Analysis should be submitted*	A PHA has been prepared by Riskcon, which is contained within **Appendix 18** of this EIS.
Waste Management *A Waste Management Plan is to be provided addressing waste produced during the construction and operational phases of the development. It should address waste quantities, storage locations, waste classification and removal. Vehicular access for collection also needs to be addressed. I note that Council's Waste Services section has more prescriptive requirements for these types of developments.*	A Waste Management Plan has been prepared by SLR Consulting, which is contained within **Appendix 25** of this EIS.
Regulated Systems *These types of development may include a water cooled system. These systems are regulated under the Public Health Act and Regulations made thereunder and have specific installation, operation and maintenance requirements. Should the development include a regulated system(s) as defined under the Public Health Act, details should be submitted to Council including, but not limited to, the number of systems, type of systems, system details and location of system.*	Detailed plans are included within **Appendix 5** of this EIS.
Water Quality Management *Any areas provided for waste/bin storage and washing are to be connected to sewer with provision of hot and cold water as well as drained to appropriately to Sydney Water's sewage system. During the meeting, the applicant advised the property was connected to both potable water and sewer through Sydney Water's networks.*	Reference should be made to the Infrastructure Report prepared by Henry & Hymas Consulting Engineers, included within **Appendix 15** of this EIS.
Erosion & Sediment Control	Refer to the sediment and erosion control plan, prepared by Henry & Hymas Consulting Engineers, which forms part of **Appendix 14** of this EIS.

TABLE 18: PENRITH CITY COUNCIL – KEY ISSUES	
Requirements	**Satisfied by**
The applicant should provide a detailed Erosion & Sediment Control Plan to Council prior to the determination of this application that conforms to Council's Development Control Plan including, but not limited to: ▪ *Location of stockpiles during construction;* ▪ *Location & details of all-weather access;* ▪ *Location & details of erosion and sediment control measures – sediment fences, vegetation strips etc;* ▪ *Location & details of stormwater pit protection measures (internal & external); and* ▪ *Location of waste storage area during construction.*	
General Environmental Health Impacts *The environmental impacts associated with the construction and operational phases of the development will also need to be addressed, such as water quality, noise, dust, erosion and sediment control and air quality. This can be included in the Statement of Environmental Effects.*	All such impacts have been considered within this EIS.
Traffic Management and Road Design	
▪ *The development should be supported by a Traffic Impact Assessment of the proposed development, road and footway network, heavy vehicle and light vehicle access, complying number of heavy vehicle parking, loading and manoeuvring areas and complying numbers of light vehicle staff and visitor parking spaces including compliance with Australian Standards, Austroads Guidelines, TfNSW (RMS) Technical Directions / Guidelines and Council's Development Control Plans (DCPs) including DCP C10.*	A robust Transport Assessment has been prepared by Ason Group and forms part of **Appendix 17** of this EIS.
▪ *The Traffic Impact Assessment should include the proposed development driveway accesses for heavy vehicles and visitor / staff car parks, sight distance compliances at driveways, arrangements for waste collection vehicles, emergency / fire service vehicles and other service vehicles, accessible parking and at least 1.8 metre wide accessible pedestrian access from the road frontage the office building, and at least 1.5m wide accessible pedestrian access to the car park to others buildings, car parking and bicycle provision numbers and bicycle facilities, electric vehicle charging station provisions and manoeuvring swept turn paths. This should include compliances with Austroads Guidelines, TfNSW (RMS) Technical Directions / Guidelines, AS 2890 including parts 1, 2 & 6, AS 1158, NSW Government Walking and Cycling Guidelines and Council's Development Control Plans (DCPs) including DCP C10.*	Reference should be made to the Transport Assessment prepared by Ason Group, which forms part of **Appendix 17** of this EIS.
▪ *The Traffic Impact Assessment and documentation should include dimensioned plans of the proposed accessible paths of travel, kerb ramps, driveways, access aisles, loading and vehicle swept path manoeuvring areas, parking spaces, accessible parking, sight distance requirements at intersections and driveways including compliance with Austroads*	Reference should be made to the Transport Assessment prepared by Ason Group, which forms part of **Appendix 17** of this EIS.

TABLE 18: PENRITH CITY COUNCIL – KEY ISSUES	
Requirements	**Satisfied by**
Guidelines, TfNSW (RMS) Technical Directions / Guidelines, AS 2890 including parts 1, 2 & 6, AS 1158, NSW Government Walking and Cycling Guidelines and Council's Development Control Plans	
▪ *The entry and exit for any car parking areas to and from a public road is to be separate from any heavy vehicle access. The car park entry/ exit and any conflict with heavy vehicles include emergency/ fire service vehicles and waste collection vehicles should be removed or justified to be limited and managed.*	Reference should be made to the Transport Assessment prepared by Ason Group, which forms part of **Appendix 17** of this EIS.
▪ *A minimum of four Electric Vehicle Charging Stations (EVCS) are to be provided within the car parking areas of the warehouse development. The charging stations are to be designed to accommodate the requirement of commercially available public vehicles and their required connector types (currently known as Type 1 and Type 2 connectors). A minimum of six additional car parking spaces are to be designed to be readily retrofitted as EVCS parking spaces. The installed EVCS car parking spaces are to be signposted and marked as for the use of electric vehicles only and are to be located as close as possible to the building accesses after accessible parking space priority. EVCS are to be free of charge to staff and visitors.*	Reference should be made to the Transport Assessment prepared by Ason Group, which forms part of **Appendix 17** of this EIS.
▪ *Complying numbers of secure, all weather bicycle parking, end of journey facilities, change rooms, showers, lockers are to be provided at convenient locations at each warehouse development in accordance with Council Development Control Plan (DCP) C10 Section 10.7, AS 2890.3 Bicycle Parking Facilities and Planning Guidelines for Walking and Cycling (NSW Government 2004).*	Reference should be made to the Transport Assessment prepared by Ason Group, which forms part of **Appendix 17** of this EIS.
▪ *The required sight lines around the driveway entrances and exits are not to be compromised by street trees, landscaping or fencing.*	Reference should be made to the Transport Assessment prepared by Ason Group, which forms part of **Appendix 17** of this EIS.
▪ *Sight distance requirements at verges, footpaths and driveways are to be in accordance with AS 2890.2 Figure 3.3 and Figure 3.4.*	Reference should be made to the Transport Assessment prepared by Ason Group, which forms part of **Appendix 17** of this EIS.
▪ *All vehicles shall enter and leave to site in a forward direction.*	Reference should be made to the Transport Assessment prepared by Ason Group, which forms part of **Appendix 17** of this EIS.
Plans and Documents	
N/A	**N/A**
Consultation	
Engagement with Penrith City Council following the issues of SEAR's is to be pursued via Council's Pre-lodgement Meeting processes. A pre-lodgement meeting can be arranged with key officers involved in the review of SSD applications which will result in detailed advise that can then be tabled with DPIE as evidence of consultation and engagement in the preparation of the final SSD Application. The applicant should be advised that fees	A pre-lodgement meeting was held with Council on 27 May 2021. Further engagement details are included within **Section 5.2.1** below.

TABLE 18: PENRITH CITY COUNCIL – KEY ISSUES	
Requirements	**Satisfied by**
apply for this service in accordance with Council's adopted Schedule of Fees & Charges.	

5.2 STAKEHOLDER CONSULTATION

In recommendation of the SEARs, the following stakeholder consultation has been undertaken. Stakeholders that have been consulted include:

- Penrith City Council
- Environment Protection Authority
- Environment, Energy and Science Group
- Transport for NSW
- NSW Fire and Rescue
- Department of Primary Industries: Food Authority
- WaterNSW
- Local residents and stakeholders

A comprehensive level of community and stakeholder engagement has been undertaken for the proposed development. This has included numerous meetings and notification letters to both agencies and all potentially-impacted residents and existing employees.

A comprehensive Community and Stakeholder Participation Strategy (located in **Appendix 16** of this EIS) has been prepared by SLR, in support of this SSD Application, offering a summary and analysis of all community and stakeholder consultations, distilling into themes, and those items identified in the consultation process, as significant.

The information provided herein, demonstrates that genuine consultation has already taken place with stakeholders, seeking feedback on the proposed development.

5.2.1 Agency Consultation

In preparation of this EIS relevant agencies were consulted with to inform the proposed development. Agency consultation undertaken to date includes, but is not limited to, those detailed in **TABLE 19**.

TABLE 19: AGENCY CONSULTATION RECORDS	
Stakeholder	**Consultation Notes**
NSW DPIE	A pre-scoping meeting was held with NSW DPIE on 14 April 2021, to discuss the proposed SSD Application. The meeting focused on planning considerations with respect to the subject site and wider locality to inform the proposed development. The NSW DPIE were provided a draft Scoping Report, which also informed the meeting discussions. This meeting was held via Microsoft Teams Attendees included: ▪ Shaun Williams – NSW DPIE ▪ Katelyn Symington – NSW DPIE ▪ Filip Milic – SBA ▪ Ben Caporale – TMX ▪ Andrew Cowan – Willowtree Planning ▪ Eleisha Burton – Willowtree Planning Key items for action following this meeting include updating the Scoping Report to: - *Specify the food items produced by the development including the raw materials processed at the site.*

TABLE 19: AGENCY CONSULTATION RECORDS	
Stakeholder	**Consultation Notes**
	- *Provide information on the processes involved in the production of food goods.* - *Distinguish the total figures between the existing development and the proposed development including employment numbers, site area, GFA and predicted traffic numbers.* - *The scoping report should also clarify if the development is providing new employment opportunities or relocation employment from existing Smithfield and Blacktown sites.* - *Any information on the number of backup generators and associated fuel storage should be provided.* - *The approximate volume of any proposed dangerous goods storage should be identified.* - *Provide details on assessment issues covered previously under SSD-7173 for the broader Altis First Estate development including biodiversity and Aboriginal cultural heritage assessments.* - *The scoping report notes air quality impacts would be considered accordingly given the nature of the development. The scoping report should expand upon the potential air quality impacts of the proposed development to be assessed further in the EIS/AQIA.* Following this meeting the SSD Scoping Report was finalised and submitted via the Major Projects portal to inform the SEARs, which were subsequently issued on 27 May 2021. This EIS and its attachments form a complete response to the SEARs, as detailed in **TABLE 3**.
Penrith City Council	A formal pre-lodgement meeting was held with Council on 2 June 2021, to present the proposal for the subject site and its future operations. Attendees included: ▪ Lauren van Etten – Council ▪ Abby Younan – Council ▪ Joshua Romeo – Council ▪ Stephen Masters – Council ▪ Caleb O'Reilly – Council ▪ Paul Reynolds – Council ▪ Michael Middleton – Council ▪ Filip Milic – SBA ▪ Neville Tapp – SBA ▪ Nick Ingleby – TMX ▪ Andrew Cowan – Willowtree Planning ▪ Eleisha Burton – Willowtree Planning The key planning consideration for the meeting includes the landscaping edge conditions and presentation to the public domain and the inclusion of additional car parking spaces.
	Both Landscape Plans and Visual Impact Analysis documents were provided to Council on 24 June 2021 for further comment.
	Further comments were provided by Lauren van Etten on 1 July 2021, including: - *It is noted that the species generally will not reach a height that screens the building.* - *In addition, the species do not generally have the broader canopy cover to reduce heat absorption.*

TABLE 19: AGENCY CONSULTATION RECORDS	
Stakeholder	**Consultation Notes**
	- *It is unclear what the width of the blister islands in the car park is but if it is smaller than 2m, then engineered tree pits with structural cells are strongly recommended.* - *Rather than the crepe myrtles proposed, a full native corridor is requested along Mamre Road for consistency and compatibility.* - *If planting is possible within the swale to the north this would assist in providing layers of trees and a greater buffer. In addition, a double staggered row of trees is requested along the northern boundary within the landscaped section, rather than the single row proposed.* - *Within the north and eastern setbacks, any gaps between encumbrances are to be landscaped as well i.e. the gap between the swale and the easement within the northern setback.* - *Concern is raised as to whether the landscaped setback adjacent Mamre Road is wide enough to allow the appropriate species mentioned above without roots disrupting the encumbrances. The setback may need to be widened to accommodate this.* - *Concern is again raised as to whether the widening of Mamre Road will affect these landscape plans.*
	The current proposed Landscape Plans, contained with **Appendix 6** of this EIS, have included suggestions from Council (where possible to do so). In response, the following comments are provided: - Tree species have been amended to taller species that were used on the approved SBA Stage 1 (SSD-9429). - Broader species selections have been accommodated in line with those that were used on the approved SBA Stage 1 (SSD-9429). - The proposed blister islands are consistent with those that were used on the approved SBA Stage 1 (SSD-9429), which did not use structural cells. - A full native corridor has been provided. - Trees cannot be placed within the swale as this area is a drainage easement, and such trees may adversely affect flows etc. However, a double row of trees has been accommodated in line with Council's suggestion. - Additional planting has been included within the northern and eastern setback areas, including maintained groundcovers and more shrubs. Threes are unsuitable for this area as it is too close to the electrical easement and swale embankment – root barriers have been indicated to appropriate locations. - As mentioned above, root barriers have been indicated to appropriate locations. It is noted that setbacks cannot be widened, as this would result in a reduction in driveway/parking/building areas. - The Mamre Road widening extent is unknown, however further details have been sought from TfNSW.
Transport for NSW	As offered in their letter dated 19 May 2021, a meeting with TfNSW was requested via email on 7 June 2021. A follow up phone conversation was held with Ms Laura van Putten on 10 June 2021, and a subsequent follow up email sent via Willowtree Planning on 24 June 2021. It was subsequently suggested that a meeting was not required.

TABLE 19: AGENCY CONSULTATION RECORDS	
Stakeholder	**Consultation Notes**
WaterNSW	The issued SEARs and agency advices did not include specific correspondence from WaterNSW. Willowtree Planning therefore wrote to WaterNSW on 28 June 2021 to seek further advice on matters that WaterNSW would want to see included within the EIS. WaterNSW responded with the following: *"Thank you for requesting WaterNSW's input relating to the SEARs for the proposed Snack Brands Manufacturing Facility. Please note that as the subject site is not located in close proximity to any WaterNSW land or assets, and as an SSD any flood works or licensing approvals will be assessed by others, the risk to water quality is considered to be low and WaterNSW has no comments or particular requirements."*
Department of Primary Industries: Food Authority	The issued SEARs and agency advices did not include specific correspondence from Department of Primary Industries (DPI): Food Authority. Willowtree Planning therefore wrote to the DPI: Food Authority on 28 June 2021 to seek further advice on matters that DPI: Food Authority would want to see included within the EIS. DPI: Food Authority responded with the following: *"Thank you for your correspondence.* *The Food Authority administers State and national food legislation. This includes the national Food Standards Code and the Food Act 2003 (NSW) as well as a range of food safety schemes in the Food Regulation 2015, which regulate key industry sectors.* *As such we cannot provide advice to individual businesses nor rulings that might restrict our options to administer the food laws."*

5.2.2 Community Stakeholder Consultation

As part of the engagement and communication process, the following consultation was undertaken by SLR:

- Engagement and Communication Plan
- Letterbox drop

5.2.2.1 Purpose of engagement

The stakeholder and community engagement process aimed to:

- Provide an outline of key project and site details of relevance to the community and stakeholders
- Identify key community and agency stakeholders to the development
- Outline the project's approach to communications and consultation at the planning, approval, construction and operational phases
- Provide a list of communications tools to be utilised
- Address the SEARs issued by the DPIE

5.2.2.2 Engagement overview

Engagement and consultation associated with the proposed development has been conducted with both Community and Agency Stakeholders. Consultation with Aboriginal parties has been undertaken previously for the site in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010) by Biosis in association with SSD-7173.

Community Stakeholders were notified of the development and invited to engage via formal letter, delivered via post to all adjacent and nearby properties identified in **Figure 19**. The engagement letter included a summary of the proposed development and site plan and invited the receivers to participate in consultation on the project, offering virtual platform meetings, face to face meetings or phone interviews. A copy of the engagement letter is included within the Community and Stakeholder Participation Strategy, which forms **Appendix 16** of this EIS.

In response to the invitation to engage, SLR consulting received no return contact via phone nor email. Whilst this lack of response is disappointing, it is not necessarily unexpected given the level of consultation undertaken with landowners and occupiers in the area in recent times on both individual project proposals and overarching strategic planning for the precinct resulting in consultation fatigue. Nevertheless SLR considers that the attempt to undertake consultation for this project has been comprehensive and satisfactory.

5.2.2.3 Engagement feedback

Given no response was received from community stakeholders, the outcomes of engagement, and the projects ability to demonstrate measures proposed to address potential impacts is difficult to express. In lieu of direct community feedback, SLR have identified potential issues and impacts of the project derived from feedback received for other developments of this nature in the area and the potential impacts identified within the original stakeholder identification scoping tool as indicative of potential unmitigated project impacts. These issues or items for consideration are expressed within **TABLE 20** below, along with how the proposed development has or will respond to these matters.

TABLE 20: CONSIDERATION OF IMPACTS

Issue or Consideration	Project Response
Noise – Construction and ongoing operation of development of this nature has the potential for acoustic impact on nearby receivers.	A Noise and Vibration Impact Assessment for construction and operation of the project, including traffic noise, has been prepared by Renzo Tonin. The impact assessment provides analysis of potential impacts of the development and proposes mitigation measures to avoid impact on sensitive receivers, including residents of nearby properties.
Air Quality – Construction of development of this nature has the potential for impact on air quality with respect to dust and operations of industrial facilities have the potential for air quality impacts such as odour.	An AQIA has been prepared by Northstar Air Quality to assess potential air quality impacts of the project and to detail appropriate mitigation measures to be implemented through construction and ongoing operation to prevent impacts to the surrounding area.
Traffic – Construction and operation of developments of this nature have the potential to impact on traffic within the surrounding road network through initial construction related traffic and ongoing operational traffic.	A Transport Assessment has been prepared by Ason Group to consider the potential traffic related impacts as a result of the proposal (at both the construction and operational stages) on the surrounding road network; access and design; car parking; and trip generation (including relevant swept path analysis). The traffic and access intentions for construction related traffic will be formalised through inclusion in the Construction Traffic Management Plan for the development, to ensure compliance.

TABLE 20: CONSIDERATION OF IMPACTS	
Issue or Consideration	**Project Response**
Light Spill and Visual Amenity – Given proximity to residential land uses to the North and the development's frontage to a public road (Mamre Road), the development once operational has the potential to impact on visual amenity and produce light spill impacting residents and road users	A Visual Impact Assessment of the development layout and design has been undertaken by Geoscapes. This assessment includes analysis of staging, site coverage, setbacks, open space, landscaping, height, colour, scale, building materials and finishes, façade design, signage and lighting and the developments potential impact (and mitigation of impact) upon nearby public and private receivers and users of the surrounding road network.

5.2.3 Employee Engagement

With respect to consultation with current employees, SBA initiated consultation with all employees from both Blacktown and Smithfield on the 16th and 17th of February 2021. This consultation included meeting with the various site based works committees and the relevant Unions as well as meeting with their employees face to face. **Figure 18** below outlines the timeline for operational decisions that has been shared with existing SBA employees.

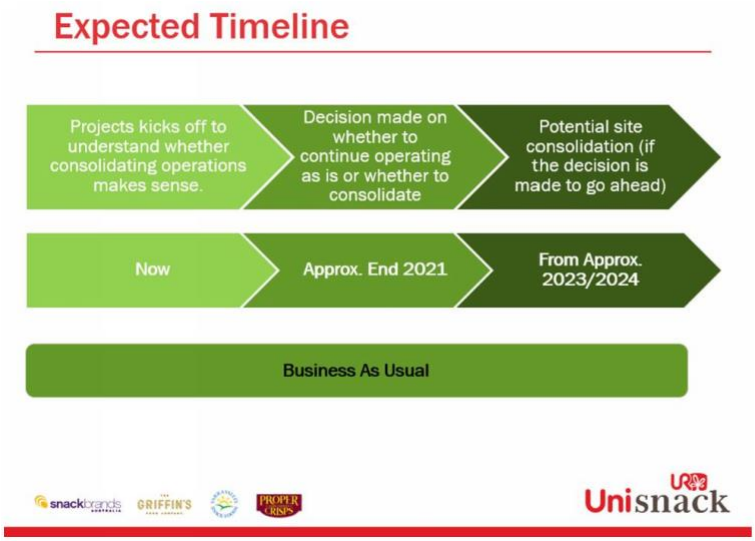


Figure 18 Operational timeline for existing SBA employees (Source: SLR, 2021)

The SBA employee consultation involved a comprehensive and aligned presentation to ensure consistent messaging and information dissemination across all meetings. All staff were informed of the current status of the project and operational intentions moving forward. Further, regular written internal updates have been and will continue to be provided to staff in the form of a newsletter providing the status and progress to date of the project's roll out.

With respect to ongoing consultation with SBA employees, SBA are committed to providing their team with an update in October 2021 and will continue to provide updates as works progress and further decisions regarding operations at the project site are made.

PART F ENVIRONMENTAL RISK ASSESSMENT

6.1 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

The SEARs (reference: SSD- 18204994) issued by the NSW DPIE on 27 May 2021 identify the following key issues:

1. Statutory and strategic context
2. Suitability of the site
3. Community and stakeholder engagement
4. Noise and vibration
5. Air quality and odour
6. Traffic and transport
7. Urban design and visual
8. Food safety
9. Waste
10. Soil and water
11. Infrastructure requirements
12. Fire and incident management
13. Hazards and risk
14. Bushfire and incident management
15. Ecologically sustainable development
16. Biodiversity
17. Planning agreement / development contributions

The abovementioned matter(s), and other necessary matters, are addressed in the following section(s).

6.1.1 Statutory and strategic context

This section of the EIS evaluates the statutory and strategic context of the proposed development, in relation to the SEARs and addresses its specific matters.

In response to item 1. Statutory and strategic context of the SEARs, the following table specifies the location of each assessment of the relevant statutory and strategic documents.

TABLE 21: STATUTORY AND STRATEGIC CONTEXT DOCUMENTS	
Document	**Response / Location of Assessment**
detailed justification for the proposal and the suitability of the site	Refer to **Section 6.1.2** of this EIS.
detailed justification that the proposed land use is permissible with consent	Refer to **Section 4.3.7** and **Section 6.1.2** of this EIS.
details of any proposed consolidation or subdivision of land	Refer to **Section 6.1.1** of this EIS.
a detailed description of the history of the site, including the relationship between the proposed development and all development consents and approved plans previously and/or currently applicable to the site	Refer to **PART B** of this EIS.
demonstration that the proposal is consistent with all relevant planning strategies, environmental planning instruments, adopted precinct plans, draft district plan(s) and adopted management plans and justification for any inconsistencies. This includes, but is not limited to:	Refer to **PART D** of this EIS.
▪ *State Environmental Planning Policy (Infrastructure) 2008*	Refer to **Section 4.3.6** of this EIS.

TABLE 21: STATUTORY AND STRATEGIC CONTEXT DOCUMENTS	
Document	**Response / Location of Assessment**
▪ *State Environmental Planning Policy (Western Sydney Employment Area) 2009*	Refer to **Section 4.3.7** of this EIS.
▪ *State Environmental Planning Policy (State and Regional Development) 2011*	Refer to **Section 4.3.5** of this EIS.
▪ *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development*	Refer to **Section 4.3.8** of this EIS.
▪ *State Environmental Planning Policy No. 55 – Remediation of Land*	Refer to **Section 4.3.9** of this EIS.
▪ *Penrith Local Environmental Plan 2010*	Refer to **Section 4.5.1** of this EIS.
▪ *The Greater Sydney Region Plan: A Metropolis of Three Cities*	Refer to **Section 4.4.1** of this EIS.
▪ *Our Greater Sydney 2056: Central City District Plan*	It is noted that the *Western City District Plan* applies to the subject site. Refer to **Section 4.4.2** of this EIS.
▪ *Future Transport Strategy 2056*	Refer to **Section 4.4.4** of this EIS.

6.1.2 Suitability for the site

This section of the EIS evaluates the suitability of the site for the proposed development, in relation to the SEARs and addresses its specific matters:

- ***a detailed justification that the site can accommodate the proposed food manufacturing facility, having regard to the scope of the operations of the existing facility and its environmental impacts and relevant mitigation measures.***
- ***details on the relationship of the development's operations with the adjoining Snack Brands Warehouse Facility (SSD-9429).***

In response to item 2. of the SEARs, a detailed analysis of the site's suitability is included in **Section 2.6** of this EIS.

The subject site is located within an establishing industrial area and is zoned IN1 General Industrial under WSEA SEPP. The proposed development will facilitate the use of the subject site for industry, which is consistent with the zoning and the surrounding context. The subject site, within an industrial area and proximity to major arterial roads, serves as being ideal for manufacturing and distribution purposes.

Accordingly, the subject site is considered to be suitable for the proposed development and is consistent with the aims and objectives of the IN1 General Industrial zone, in that it seeks to facilitate future employment generating development that responds to the characteristics of the land and is compatible with surrounding land uses.

The subject site is suitable for the size and scale of the development proposed and represents a quality outcome for otherwise unutilised industrial land.

In summary, the subject site is highly-suited to accommodate the intended new development based on the following factors:

- WSEA SEPP allows for the proposed development as a permissible use;
- The site is readily accessible via the regional road network;
- The proposed development is compatible with surrounding development and local context;
- The subject site can be serviced immediately and at no cost to Government;
- The proposed development causes minimal impact on the environment;
- The site will complement functions of the wider Mamre Road area; and
- The proposed built form is designed to mitigate any impacts on surrounding properties.

The following key elements of the site and proposed development are noted:

6.1.2.1 Visual Impact

The proposed development is expected to create some visual impacts for receptors in close proximity to the site. However, the significance of these impacts is either low or negligible, due to the fact the proposal is located against the backdrop of the existing SBA high bay and other industrial development located within the immediate surround context.

Properties to the north of the subject site will receive views of the development. However, the majority of these views are expected to be limited by either existing vegetation or the resultant visual impacts not judged to be significant due to the proposed development only affecting a small proportion of the view. Therefore, the proposed view would be very similar to the existing baseline view.

The change in view is judged to be slightly larger from locations along Mamre Road at close range, such as the cycleway or roadway. The same statement can be applied to Distribution Drive within First Estate. However, the sensitivity of these locations is judged to be low due the presence of large scale industrial development within the immediate surrounding context and the type of users at these locations.

The Visual Impact Assessment, prepared by Geoscapes (**Appendix 7**), presents a series of photomontages that demonstrate that the proposed landscape planting at the development site, can be effective in screening to reduce visual impacts for a number of sensitive close-range properties. This will be most effective after 15 years and for those receptors who experience direct views at close to medium range.

6.1.2.2 Noise and Vibration

Renzo Tonin has carried out an acoustic assessment to support the proposed development, through which they have quantified operational noise emission from the proposed development and assessed noise at the nearest sensitive receivers. Based on the assumptions and inputs within this report, it has been established that operation of the site is capable of complying with relevant EPA and Council noise emission requirements.

Refer to **Section 6.1.4** of this EIS.

6.1.2.3 Air quality and Odour

Northstar Air Quality have undertaken an AQIA (**Appendix 22**), performed using process-specific emissions measured at existing operations at the SBA Smithfield and Blacktown facilities and then applied to the proposed activities at the subject site. This uses a dispersion modelling assessment to predict off site impacts of emissions from the commercial kitchen, gas-fired boilers and wastewater treatment plant.

The AQIA does not predict any non-compliance (exceedance) of the relevant impact assessment criteria at any identified receptor location.

A range of management and control measures have been recommended including an emissions monitoring program to measure emissions at the proposed Orchard Hills site within three months of operating, and also the implementation of a series of additional controls to offer effective air quality management.

6.1.2.4 Transport and Traffic

The proposal generally refers to amendments to the existing development at Lot 11 and construction of a new industrial building at Lot 10. It is emphasised that ultimately, these two Lots will operate in conjunction, and they will be tenanted to SBA as a whole. Accordingly, for assessment conservativeness, the assessment has been undertaken based on the operation of Lot 10 and 11 as an overall development.

The subject site is proposed to be accessed to / from Distribution Drive via the intersection of Mamre Road and Distribution Drive. In the future, primary access to the First Estate Precinct, of which Lot 10 and Lot 11 forms a part of, is to be provided via the existing signalised T-intersection of Mamre Road with James Erskine Drive and secondary access is to be provided via a left-in / left-out priority controlled

intersection with Mamre Road located approximately 500 metres south of the James Erskine Drive intersection.

Noting the approved traffic generation thresholds for Lot 10 and Lot 11 under the approved First Estate Master Plan is 84 trips/hr and 87 trips/hr during AM and PM peak hours separately and 1,186 trips per day, the forecast traffic generation for the proposed operation would represent an increase over threshold by 11 trips/hr during evening peak hour, which is considered a minor departure from the original approval. The proposed development (inclusive of the existing Lot 11 development), during normal operational period, is expected to generate in the order of 84 trips/hr and 98 trips/hr during the morning and evening peak hour periods, and 1,120 trips per day.

In referring to the assessment by First-Principles, the increases of this magnitude are considered minimal in the overall scheme and expected to have negligible impacts to the surrounding road network.

The development traffic is above the approved thresholds by minor amounts such that it would be equivalent to increases of approximately 1 vehicle every 6 minutes during PM peak hours.

Previous modelling as part of the planning for the overall First Estate Precinct concluded that the interim access arrangements to Mamre Road (prior to the upgrade of Mamre Road and James Erskine Drive to four legs) will operate with a Level of Service B during both peak periods – considered good operation in accordance with TfNSW approved intersection performance criteria.

On the basis of the above, it is anticipated that the road network would be more than adequate to cater for the traffic generated by the proposal. Accordingly, it is considered that no further road upgrades are required to support the proposed development. Ason Group have determined that there is sufficient spare capacity within the existing and planned intersection designs to accommodate the traffic volumes generated by the proposal without causing any adverse impacts to the road network operations.

In summary, Ason Group have concluded that the proposal is supportable on traffic and transport planning grounds and is not expected to result in any adverse impacts on the surrounding road network or the availability of on-street parking environment.

6.1.2.5 Comparison against SSD-9429

The proposed development consists of an industrial facility, adjacent to the recently constructed warehouse facility of SSD-9429. The proposed development would be operated by SBA, concurrently with the neighbouring site. The following table provides a comparison of development parameters reflected in SSD-9429 and those proposed as part of this application.

TABLE 22: COMPARATIVE DEVELOPMENT PARAMETERS

Development Parameter	SSD-9429	Proposed SSD (consolidated operations*)
Operation	Warehouse and distribution	Industrial food manufacturing facility
Employment numbers	87 personnel	415 personnel
Site area	52,610m^2	104,323m^2
Gross floor area	30,255m^2	57,676m^2
Car parking	114 spaces	274 spaces
Predicted traffic numbers	41 vehicles per hour during the AM peak and 42 vehicles per hour during the PM peak – total of 572 trips per day	84 vehicles per hour during the AM peak and 98 vehicles per hour during the PM peak – total of 1,120 trips per day
Hours of operation	24 hours per day, seven days per week	24 hours per day, seven days per week

TABLE 22: COMPARATIVE DEVELOPMENT PARAMETERS		
Development Parameter	**SSD-9429**	**Proposed SSD (consolidated operations*)**
Acoustic operational emissions (max limits)		
Receiver A:	Day – 39 $L_{Aeq(15\ minute)}$ Evening – 39 $L_{Aeq(15\ minute)}$ Night – 35 $L_{Aeq(15\ minute)}$ Night – 48 $L_{A1(1\ minute)}$	No longer a receiver
Receiver B:	Day – 39 $L_{Aeq(15\ minute)}$ Evening – 39 $L_{Aeq(15\ minute)}$ Night – 38 $L_{Aeq(15\ minute)}$ Night – 49 $L_{A1(1\ minute)}$	Day – 39 $L_{Aeq(15\ minute)}$ Evening – 39 $L_{Aeq(15\ minute)}$ Night – 38 $L_{Aeq(15\ minute)}$ Night – 49 L_{max}
Receiver C:	Day – 36 $L_{Aeq(15\ minute)}$ Evening – 36 $L_{Aeq(15\ minute)}$ Night – 35 $L_{Aeq(15\ minute)}$ Night – 49 $L_{A1(1\ minute)}$	Day – 36 $L_{Aeq(15\ minute)}$ Evening – 36 $L_{Aeq(15\ minute)}$ Night – 35 $L_{Aeq(15\ minute)}$ Night – 49 L_{max}
Receiver D:	Nothing set	Day – 53 $L_{Aeq(15\ minute)}$ (external when in use)
* consolidated operations are inclusive of the existing warehouse (SSD-9429) and proposed manufacturing facility.		

The subject site's consistency with applicable regional and local strategies is demonstrated in the comprehensive environmental assessment, provided in **PART F** of this EIS, which includes an analysis of all potential impacts, which has been informed by the relevant consultant reports. Accordingly, the environmental assessment prescribes recommendations and mitigation measures (where necessary), to account for all identified potential impacts, by the proposed development. The suitability of the subject site with regard to the proposed development, can be attributed to its ready ability to provide employment, its excellent access arrangements, its suitable contextual setting, and its minimal impact on the environment.

Accordingly, the EIS prescribes recommendations and mitigation measures (where necessary), to account for all identified potential impacts, by the proposed development. The suitability of the subject site to cater for the proposed development, can be attributed to:

- its ability to provide employment,
- its excellent access arrangements,
- its suitable contextual setting, and
- its minimal impact on the environment.

The land that is the subject of this application, is owned by the following entities:

- Lot 10 DP271141 – Snack Brands Industries Pty Ltd
- Lot 11 DP271141 – The Trust Company (Australia) Limited

Given the differing entity ownerships, the two land parcels will need to remain on separate titles. It is noted that the inter-allotment operations can achieve BCA compliance, as demonstrated in **Section 6.1.12** of this EIS.

6.1.3 Community and stakeholder engagement

This section of the EIS evaluates the community and stakeholder engagement for the proposed development, in relation to the SEARs and addresses the following specific matters.

- ***a community and stakeholder participation strategy identifying key community members and other stakeholders;***
- ***details and justification for the proposed consultation approach(s);***

- ***clear evidence of how each stakeholder identified in the community and stakeholder participation strategy has been consulted;***
- ***issues raised by the community and surrounding landowners and occupiers;***
- ***clear details of how issues raised during consultation have been addressed and whether they have resulted in changes to the development; and***
- ***details of the proposed approach to future community and stakeholder engagement based on the results of consultation.***

SLR Consulting has prepared a Community and Stakeholder Participation Strategy to address the planning, construction and operational stages of the proposed development, which is included in **Appendix 16** of this EIS.

6.1.3.1 Key Stakeholders

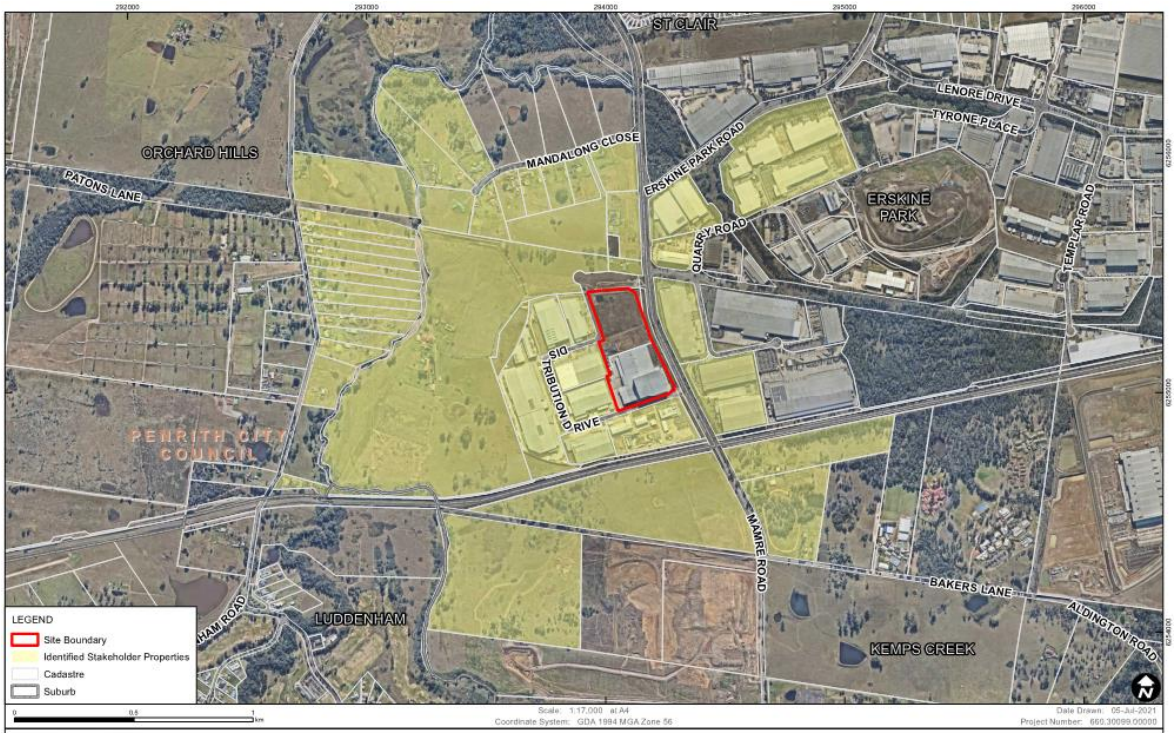


Figure 19 **Community Stakeholder properties** (Source: SLR Consulting, 2021)

6.1.3.2 Consultation approach(s)

The engagement strategy for the project has been tailored utilising tools appropriate to the stage of the project's development (including planning, approval, construction and operation) and appropriate to the audience of the engagement, including community and agency stakeholders. Communications and engagement will be undertaken by the project proponent and/or their representatives. This will include planning and engagement consultants engaged by the developer and contractors / subcontractors carrying out the construction activities.

To allow for clear and transparent record keeping, a communications and engagement register has been developed for the project. This register will include a record of all community and stakeholder engagement undertaken for the project over its lifespan, including consultation undertaken to inform this strategy, through to the recording of complaints and enquiries received during the construction phase of the project.

TABLE 23: COMMUNICATION AND ENGAGEMENT TOOLKIT				
Tool / Technique	**Description**	**Audience**	**Project Stage**	**Specifications**
Community consultation meetings, workshops and forums	Informal meetings, providing project updates and opportunity for the community and stakeholders to discuss recent experiences and upcoming construction activities.	The wider community and key stakeholders	Planning, Construction, Operation	Project updates including a review of any complaints received and remedial actions, followed by informal discussion with stakeholders and the community.
Individual meetings	Meetings with stakeholders as required to discuss a specific item.	The wider community and key stakeholders	Planning, Construction, Operation	Meetings may be held face to face, over the phone or via an online platform. Details and format subject to the meetings context, with a record of the discussion included in the consultation register and actioned as required.
Agency meetings	Meetings with agencies to discuss matters relevant to their agency.	Relevant agency	Planning, Construction, Operation	Meetings may be held face to face, over the phone or via an online platform. Meetings will be held as required to address matters relevant to specific agencies including the satisfaction SEARs requirements or of conditions of consent.
Newspaper Advertisement	Newspaper Advertisement(s) to be published in a local newspaper (for example The Western Weekender or Mt Druitt – St Marys Standard) identifying project commencement and details of the contact phone number and web page address.	The wider community and key stakeholders	Construction	An advertisement will be published advising of the commencement date of construction, a brief overview of the project and key contact details for enquires and complaints including the phone number, webpage and email address. Further advertisements will be published as required where intrusive events are scheduled advising of the nature and date(s) and time(s) of the event and key contact details for enquiries and complaints.
Letterbox drop and email notifications	Letters would be provided to specific receivers identified as being potentially	Residents of the immediate area	Planning, Construction	Letter are to contain key information and avenues for contact (phone, email and post) should further information be

TABLE 23: COMMUNICATION AND ENGAGEMENT TOOLKIT				
Tool / Technique	**Description**	**Audience**	**Project Stage**	**Specifications**
	affected by the project generally or specific construction related activities. Letters to be distributed by mail or email.			required or the receiver wishes to make comment.
On site signage	Project information details.	Visitors to the site and residents of the immediate area	Construction, Operation	Contain key project contact details including the hotline and web page, along with relevant project and safety information.
Project information and complaints number	Project phone number available for 24 hours recording of project feedback.	The wider community and key stakeholders	Construction	Phone number located on site signage, the web page and all project information material. Feedback provided to be incorporated into the consultation register and actioned as required.
Text messages and email alerts	Text messages and emails providing prompt updates.	Residents of the immediate area	Planning, Construction, Operation	Text Messages and email alerts will provide important information at short notice to potentially affected receivers where consent has been granted to utilise contact detail for this purpose.
Website	A project website shall be developed to provide general information on the project and ongoing updates on project progress.	The wider community and key stakeholders	Construction	Website address and phone number located on site signage and all project information material. Web page to provide contact details including phone number, email address and enquiry form, as well as project updates, along with environmental performance monitoring.

6.1.3.3 Planning phase engagement

This subsection summarises engagement and consultation activities undertaken to date, during the planning stage of the project's development.

Engagement and consultation associated with the proposed development has been conducted with both Community and Agency Stakeholders. Consultation with Aboriginal parties has been undertaken previously for the site in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010) by Biosis in association with SSD-7173.

Community Stakeholders were notified of the development and invited to engage via formal letter, delivered via post to all adjacent and nearby properties identified in **Figure 19**. The engagement letter included a summary of the proposed development and site plan and invited the receivers to participate in consultation on the project, offering virtual platform meetings, face to face meetings or phone interviews. A copy of the engagement letter is included Community and Stakeholder Participation Strategy at **Appendix 16** of this EIS.

In response to the invitation to engage, SLR consulting received no return contact via phone nor email. Whilst this lack of response is disappointing, it is not necessarily unexpected given the level of consultation undertaken with landowners and occupiers in the area in recent times on both individual project proposals and overarching strategic planning for the precinct resulting in consultation fatigue.

With respect to consultation with current employees, SBA initiated consultation with all employees from both Blacktown and Smithfield on the 16th and 17th of February 2021. This consultation included meeting with the various site based works committees and the relevant Unions as well as meeting with their employees face to face.

Engagement to date with Agency Stakeholders, as part of the preparation of the EIS for the project, is documented within **Section 5.2.1** of this EIS.

6.1.3.4 Consultation feedback

Given no response was received from community stakeholders, the outcomes of engagement, and the project's ability to demonstrate measures proposed to address potential impacts is difficult to express. In lieu of direct community feedback, SLR have identified potential issues and impacts of the project derived from feedback received for other developments of this nature in the area and the potential impacts identified within the original stakeholder identification scoping tool as indicative of potential unmitigated project impacts. These issues or items for consideration are expressed within **TABLE 20**, along with how the proposed development has or will respond to these matters.

6.1.3.5 Ongoing and future engagement

Ongoing consultation and engagement shall be undertaken through all future stages of the project. Formal notification of the proposed development will be undertaken by NSW DPIE during the assessment period for the SSD Project, with SBA committed to responding to all relevant issues and queries arising during this period through DPIE's formal response to submissions process.

During construction, consultation and engagement shall be undertaken with relevant parties in accordance with the Community and Stakeholder Participation Strategy and will include notification of the commencement of works and consultation on works with the potential for impact on nearby receivers. SBA and their contractors will continue to engage and work with all relevant agencies and authorities to meet all regulatory requirements and ensure compliance with conditions of consent.

As the project progresses, refinement of the Community and Stakeholder Participation Strategy document and the tools located within the engagement strategy may be required to ensure the ongoing effectiveness of engagement measures proposed. It is recommended that this strategy forms the basis of a Community Consultation Strategy (CCS), which would be prepared and implemented throughout the construction and operational phases of the project. The CCS would include engagement and complaints/enquiry protocols, the identification of engagement responsibilities and the maintenance of an engagement register. The CCS would ensure the positive approach to engagement undertaken for the project to date continues through the project lifecycle.

With respect to ongoing consultation with SBA employees, SBA are committed to providing their team with an update in October 2021 and will continue to provide updates as works progress and further decisions regarding operations at the project site are made.

SLR considers that the attempt to undertake consultation for this project has been comprehensive and satisfactory.

It is also noted that formal exhibition will form part of the SSD process.

6.1.4 Noise and vibration

This section of the EIS evaluates the noise and vibration aspects of the proposed development, in relation to the SEARs and addresses the following specific matters:

- ***a quantitative noise and vibration impact assessment undertaken by a suitably qualified acoustic consultant in accordance with the relevant Environment Protection Authority guidelines and Australian Standards which includes:***
  - ***the identification of impacts associated with construction, site emission and traffic generation at noise affected sensitive receivers, including the provision of operational noise contours and a detailed sleep disturbance assessment.***
  - ***details of noise monitoring survey, background noise levels, noise source inventory and 'worst case' noise emission scenarios.***
  - ***consideration of annoying characteristics of noise and prevailing meteorological conditions in the study area.***
  - ***a cumulative impact assessment inclusive of impacts from other developments.***
  - ***details and analysis of the effectiveness of proposed management and mitigation measures to adequately manage identified impacts, including a clear identification of residual noise and vibration following application of mitigation these measures and details of any proposed compliance monitoring programs.***

In response to the SEARs items relating to noise and vibration, we note the following information presented by Renzo Tonin in their Noise Emission Assessment, which forms part of **Appendix 23** of this EIS.

Renzo Tonin have identified the following primary noise sources associated with the proposed development:

- External areas – noise from truck deliveries, unloading activities (forklift, tipper truck, conveyor belts, filling produce "silos" with raw material) and external plant/equipment (water treatment, ventilation fans etc).
- Internal areas – operational noise from plant and equipment.

6.1.4.1 Nearby noise sensitive receivers

TABLE 24: NOISE ASSESSMENT LOCATIONS

ID	Address	Description	Distance from site (m)*
Location B	579 Mamre Road	Double storey residential house located north of the site	780m
Location C	Mandalong Close	Single storey residential dwelling	600m
Location D	Old MacDonald Child Care Centre	Child care centre	320m

* *Distance referred to is from approximately the centre of the site to the receiver property boundary, or 30m from the dwelling (whichever is further).*

With respect to Location A (5730-577 Mamre Road):

- At the time of development approval of the first SBA warehouse, this location was occupied for residential purposes.
- The site has since been purchased by Altis Property Partners (developer of the First Estate Precinct).
- The site is no longer occupied for residential purposes.
- The site is proposed to be redeveloped for non-residential purposes.

As such, the noise impact on the former dwelling at this site will not be assessed in the Noise Emission Assessment.

Figure 20 **Receiver locations** (Source: Renzo Tonin, 2021)

6.1.4.2 Project noise goals

The proposed development is an expansion of an existing warehouse.

The existing warehouse was approved in SSD-9429. This was an approval specific to the SBA development, and not a sub-division wide approval. The operational noise emission limits were set out in condition B19 of the development approval, and are highlighted below:

Operational Noise Limits

B19. The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in **Table 2**.

Table 2 *Noise Limits dB(A)*

Location	Day $L_{Aeq(15\ minute)}$	Evening $L_{Aeq(15\ minute)}$	Night $L_{Aeq(15\ minute)}$	Night $L_{A1(1\ minute)}$
Receiver A	39	39	35	48
Receiver B	39	39	38	49
Receiver C	36	36	35	49

Note: *Noise generated by the development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy (EPA, 1999) (as may be updated or replaced from time to time). Refer to the plan in Appendix 4 for the location of residential sensitive receivers.*

It is proposed that the cumulative operational noise from the existing and expanded warehouse continue to comply with these requirements. In doing this, there would be no increase in currently permitted noise levels (from the combined SBA compared to currently approved noise limits), and as such there would be no overall increase in First Estate Precinct noise emission as a result of the proposed SBA expansion.

It is therefore not necessary to consider operational noise from other noise sources within the First Estate Precinct other than the existing warehouse when considering cumulative noise impacts.

With respect to the Old MacDonald Child Care centre:

- No noise emission target was set in the approval for the original SBA warehouse.
- For the purpose of setting reasonable noise emission goals, an external noise goal of 55dB(A)$_{Leq}$ at the child care centre will be adopted. This is consistent with the noise goals set in the Noise Policy for Industry when assessing impacts on passive outdoor recreation areas and is appropriate in the assessment of a child care centre playground.

6.1.4.3 Noise sources

Site attendances were conducted on 28 and 29 April 2021 at SBA manufacturing warehouses at Smithfield and Blacktown. These site attendances enabled measurements of vehicle noise specific to the SBA fleet. In addition, it enabled measurements of incidental noise events that will be specific to the SBA site, being:

- Use of tipper truck for raw produce unloading.
- Conveyors belts.
- Loading of silos with raw produce.
- Measurements of internal areas (corn/potato processing plant etc).

6.1.4.4 Operational noise emission assessment

EPA Noise Policy for Industry typical practice (and the conditions of consent applied to the existing SBA warehouse) requires assessment of noise impacts in 15 minute intervals. A worst case noise emission scenario has been determined in consultation with SBA and Ason Group. This will include proposed and existing warehouse operations and as such will enable a cumulative prediction of the existing and proposed operational noise.

For the purpose of determining a worst case 15 minute period, the following will be assumed to occur:

- Potato truck delivery:
  - Truck (b-double) enters site and reverses to the potato delivery dock (2 minute duration).
  - The tipper/unloader is then engaged for the remaining time of the 15 minute period.
  - Potato truck entry path and unloading.
- Corn truck delivery:
  - Truck enters site and drives to the corn delivery dock (2 minute duration – no reversing
  - movement required).
  - The side unloading process is then engaged for the remaining time on the 15 minute period.
  - Corn truck entry path and unloading position.
- Forklifts – five forklifts are assumed to be in operation continuously in external hard stand areas.
- Conveyor belts at the corn and potato unloading areas are in continuous operation.
- Staff car park - 10 passenger vehicles are started, and drive to the site exit (30 second duration).
- Existing warehouse operations:
  - B-double movement leaving the warehouse (1 minute travel duration).
  - Travel path.

Although this is more likely to occur during the daytime, there is a (unlikely) possibility that it could occur at night time. For this reason, noise from this scenario will be assessed with reference to the night time noise emission goals.

With respect to the corn silo:

- The corn silo at the SBA site at Blacktown is located in an external area.
- The primary noise from its use is from corn hitting the metal walls of the silo when being filled.
- Based on the measured noise levels, this activity is expected to result in exceedances of noise goals.
- Given this, the silos are proposed to be housed in internal areas, and provided this is the case, noise from their loading will not contribute to the external noise emission.

In each noise emission prediction, the sound power levels identified in Noise Emission Assessment Report are adopted. In the case of the truck reversing beacon, a 5B(A) penalty is applied to the noise level given the tonal nature of the noise (as per EPA Noise Policy for Industry Fact Sheet C).

Predicted operational noise levels are as follows:

Receiver	Predicted Noise Level (dB(A)$L_{eq(15min)}$)			Noise Criteria (dB(A)$L_{eq(15min)}$)			Exceedance (dB)
	Normal Conditions	Adverse Conditions (Wind)[2]	Adverse Conditions (Temperature Inversion)[3]	*Day*[1]	*Evening*[1]	*Night*[1]	
Location B (579 Mamre Road)	33	38	38	*39*	*39*	*38*	0
Location C (23-31 Mandalong Close)	31	35	35	*36*	*36*	*35*	0
Location C (73 Mandalong Close	30	34	34	*36*	*36*	*35*	0
Old MacDonald Child Care Centre	44	49	N/A[4]	*53 (external, when in use)*			0

Notes:
1. Daytime = 7.00am-6.00pm; Evening = 6.00pm-10.00pm; Night = 10.00pm-7.00am.
2. 'D' atmospheric stability class with 3m/s winds - noise-enhancing meteorological conditions
3. 'F' atmospheric stability class with 2m/s winds (night-time only) noise-enhancing meteorological conditions
4. Temperature Inversion only occurs at night time. Child Care Centre not in use at this time.

As noted in the table above, under a worst case scenario noise emissions are predicted to be compliant at nearby development, both under standard weather conditions and in the event of adverse weather conditions.

Management restrictions underpinning the assumptions relating to the worst case scenario are set out below.

6.1.4.5 Operational management/mitigation recommendations

In order to ensure that compliant noise emissions are achieved, the following is required:

- Heavy vehicle movements in any 15 minute period should not exceed the worst case scenario assessment outlined in the Noise Emission Assessment Report being one potato delivery, one corn delivery and one outbound movement from the existing warehouse.
- Forklifts should be electric or gas, and must not be diesel.
- Water treatment plant and corn silo must be located within an enclosed building.
- Doors on the northern façade of the warehouse must be kept closed except as required for ingress/egress.
- Roof sheeting and external wall sheeting of the warehouse should be constructed of minimum 0.5mm thick steel (R_w 23) or material of equal or higher surface density.
- Indicative roof top plant and equipment acoustic requirements:

- Any roof top refrigeration equipment, evaporative cooler, cooling tower air-cooled chiller or similar should have a sound power level of no more than 100dB(A). If equipment noise levels are higher, acoustic treatment (localised screen) would be required.
- Any roof top fan to have a noise level of no more than 75dB(A) at 3m distance. If fan exceeds his noise level, acoustically treated ductwork will be required.
- All external plant selections to be acoustically reviewed at CC stage pending final equipment selection and layout design.

6.1.4.6 Construction noise assessment

A summary of construction noise management levels is presented below.

Noise levels at any receiver location resulting from construction works would depend on the location of the receiver with respect to the area of construction, shielding from intervening topography and structures, and the type and duration of construction being undertaken. Furthermore, noise levels at receivers would vary significantly over the total construction program due to the transient nature and large range of plant and equipment that could be used.

Noise emissions were determined by modelling the noise sources, receiver locations, and operating activities, presents noise levels likely to be experienced at the nearby affected receivers based on the construction activities and plant and equipment associated with the proposed site. The noise level range presented represents the plant item operating at a location furthest from the receiver and a location closest to the receiver. Noise levels were calculated taking into consideration attenuation due to distance between the construction works and the receiver locations and any intervening structures. The noise predictions are conservative and do not incorporate acoustic shielding provided by hoarding.

The worst affected receivers for are typically in the first row of houses back from the proposal site, with direct line-of-sight to the construction work area. Receivers in the next row of houses back from the proposal, or receivers without direct line-of-sight to the construction area would typically be exposed to construction noise levels 5 to 10 dB(A) lower than the levels predicted for the worst affected receivers.

Predicted construction noise levels are as follows:

Plant Item	Plant description	Predicted dB(A)$L_{eq(15min)}$ construction noise levels		
		Location B (579 Mamre Road)	Location C (Mandalong Close)	Location D (Child Care
Noise management level (external) – Standard construction hours		*48*	*48*	*65- playground*
1	Trucks (concrete/delivery)	33-38	30-35	40-45
2	Hand tools	30-35	<30	40-45
3	Mobile/Tower crane (electric)	30	<30	35-40
4	Concrete pump	30-35	<30	40-45
5	Bobcat	<30	<30	35-40

The predicted noise levels presented above indicate that the noise levels during the building construction and building fit-out stages are likely achieve the noise management level (NML) at nearby sensitive receivers. There may be time when loud equipment or a number of concurrent construction activities may result in construction noise levels being over the NML, particularly when these activities are operating near to the corresponding receiver location. However, no residential receivers are predicted to be highly noise affected (i.e., exposed to noise levels greater than 75 dB(A)).

In light of the predicted noise levels above, it is unlikely that construction noise mitigation over and above the general good practice recommendations outlined below is warranted to preserve the amenity of nearby noise sensitive development.

6.1.4.7 Construction vibration assessment

We note that extensive bulk excavation (typically the most vibration intensive construction activity) is not expected.

During the building construction phase vibration intensive plant and equipment are not proposed to be typically used as part of the construction works. As such, considering the distance to other sensitive receiver buildings there is generally considered low to negligible risk of vibration impact, depending on the location of the construction works.

The pattern of vibration radiation is very different to the pattern of airborne noise radiation and is very site specific as final vibration levels are dependent on many factors including the actual plant used, its operation and the intervening geology between the activity and the receiver. Potential vibration generated at receivers for this project will be dependent on separation distances, the intervening soil and rock strata, dominant frequencies of vibration and the receiver building's construction and structure.

The recommended minimum working distances for vibration intensive plant are presented below:

Plant item	Minimum working distance, m					
	Cosmetic damage			Human disturbance		
	Commercial and industrial buildings1	Dwellings and similar structures1	Sensitive structures (e.g. heritage)[1]	Residences Day[2]	Offices	Workshops
5 Tonne Excavator w/Hydraulic Breaker, Vibratory Compactor	5	5	10	20	15	10

Notes: 1. Vibration limits referenced from DIN 4150 Structural Damage - Safe Limits for Short-term Building Vibration.
2. Daytime is 7 am to 10 pm;

Site specific buffer distances for vibration significant plant items must be measured on site where plant and equipment is likely to operate close to or within the minimum working distances for cosmetic damage.

As previously identified, unlike noise, vibration cannot be 'predicted' due to many variables from site to site, for example soil type and conditions; sub surface rock; building types and foundations; and actual plant on site. The data relied upon in this assessment (tabulated above) is taken from a database of vibration levels measured at various sites or obtained from other sources (e.g. BS 5228-2:2009). They are not specific to this project as final vibration levels are dependent on many factors including the actual plant used, its operation and the intervening geology between the activity and the receiver.

6.1.4.8 Construction management/mitigation recommendations

Construction noise management/mitigation:

The following general noise management measures are recommended for all receiver locations:

- Plant and equipment must be properly maintained.
- Strategically position plant on site to reduce the emission of noise to the surrounding neighbourhood and to site personnel.
- Any equipment not in use for extended periods during construction work must be switched off.
- The offset distance between noisy plant and adjacent sensitive receivers is to be maximised where practicable.
- Plant used intermittently to be throttled down or shut down when not in use where practicable.
- In addition to the noise mitigation measures outlined above, a management procedure will need to be put in place to deal with noise complaints that may arise from construction activities. Each complaint will need to be investigated and appropriate noise amelioration measures put in place to mitigate future occurrences, where the noise in question is in excess of allowable limits.

- Good relations with people living and working in the vicinity of a construction site should be established at the beginning of a project and be maintained throughout the project, as this is of paramount importance. Keeping people informed of progress and taking complaints seriously and dealing with them expeditiously is critical. The person selected to liaise with the community must be adequately trained and experienced in such matters.
- Given the large distance from the site to noise sensitive development (residences, child care centre), noise monitoring during the construction period is not warranted.

Construction vibration management/mitigation:

Given the works are unlikely to be vibration intensive, the separation distance to the nearest buildings and he fact that the nearby buildings are industrial (and typically less vibration sensitive), significant vibration mitigation is unlikely to be warranted.

The following vibration management measures are provided to minimise vibration impact from construction activities to the nearest affected receivers and to meet the relevant human comfort and building damage vibration limits:

1. A management procedure should be implemented to deal with vibration complaints. Each complaint should be investigated and where vibration levels are established as exceeding the set limits, appropriate amelioration measures should be put in place to mitigate future occurrences.
2. Where vibration is found to be excessive, management measures should be implemented to ensure vibration compliance is achieved. Management measures may include modification of construction methods such as using smaller equipment, establishment of safe buffer zones as mentioned above, and if necessary, time restrictions for the most excessive vibration activities. Time restrictions are to be negotiated with affected receivers.
3. Where construction activity occurs in close proximity to sensitive receivers, vibration testing of actual equipment on site would be carried out prior to their commencement of site operation to determine acceptable buffer distances to the nearest affected receiver locations.
4. Dilapidation surveys should be conducted at all residential and other sensitive receivers within 50 metres of the construction site. Notification by letterbox drop would be carried out for all occupied buildings within 100m of the construction site. These measures are to address potential community concerns that perceived vibration may cause damage to property.

6.1.5 Air quality and odour

This section of the EIS evaluates the air quality aspects of the proposed development, in relation to the SEARs and addresses the following specific matters:

- ***a quantitative assessment of the potential air quality, dust and odour impacts of the development in accordance with relevant Environment Protection Authority guidelines.***
- ***the details of buildings and air handling systems and strong justification for any material handling, processing or stockpiling external to buildings.***
- ***details of proposed mitigation, management and monitoring measures.***

In response to the SEARs items relating to air quality, we note the following information presented by Northstar Air Quality in their AQIA, which forms **Appendix 22** of this EIS.

6.1.5.1 Identification of Potential Emissions

Construction phase:

Construction of the proposal would involve no substantive demolition activities (other than the demolition of a single wall) but will comprise minor earthworks (cut and fill), building and construction of pavements and hardstand, and construction of a new warehouse and associated offices.

An indicative list of plant and equipment that may be used during the construction of the proposal includes:

- Excavators;
- Front End Loaders;
- Graders;
- Light vehicles;
- Heavy vehicles;
- Drills;
- Pneumatic hand or power tools;
- Cranes;
- Commercial vans; and
- Cherry pickers.

Emissions to atmosphere associated with the above construction activities relate to construction dust (particulates) which, if not adequately controlled, may be experienced in the surrounding areas as an amenity impact (such as visible dust plumes, dust soiling and dirt track-out onto surrounding roads) and as health impacts.

Construction phase dust emissions tend to be larger size particulates, typically in the range of 30 microns (µm) to 10 µm, and particles of this size are typically experienced as amenity impacts rather than health impacts.

With regard to emissions from road traffic, the assessment considers the potential impact of emissions associated with the construction and operational phases. Where changes to construction and/or operational traffic is significant, a quantitative assessment is typically performed. Operational phase traffic emissions are discussed in following subsection.

Road traffic exhaust emissions may include a range of air pollutants, including particulate matter (as PM10 and PM2.5) and oxides of nitrogen (NO_X), including nitrogen dioxide (NO_2). There would additionally be some less significant emissions of carbon monoxide (CO), sulphur dioxide (SO_2) and volatile organic compounds (VOCs) (including benzene and 1,3-butadiene).

In regard to construction traffic, it has been assumed that an estimated 50 – 100 vehicles may be required during peak hours during the construction period due to the large volume of the proposed structure.

To minimise impacts of traffic during construction, construction traffic would be managed through controls imposed through the CEMP, including the CTMP.

Operational phase:

During the operation of the proposal, the following activities are anticipated to result in potential emissions to air:

- Road traffic emissions: road traffic exhaust emissions from the movement of vehicles in and out of the proposal site on paved road surfaces. These are associated with vehicles performing delivery tasks, and cars for workers in the office spaces;
- Vehicle idling emissions: road traffic exhaust emissions from vehicles idling at delivery and loading bays;
- Commercial kitchen emissions: emissions from food manufacturing activities at the proposal site, which are largely extracted and ducted to an after-burning waste heat boiler prior to discharge to atmosphere;
- Boiler emissions: emissions from the operation of gas-fired boilers, operated for the purpose of generating hot water for cooking purposes (e.g. cooking corn);
- Wastewater emissions: emissions from wastewater treated prior to discharge from the proposal site.

A summary of the emission sources and potential emissions to air during the operation of the proposal, is presented in **TABLE 25**.

TABLE 25: IDENTIFIED POTENTIAL SOURCES OF OPERATIONAL AIR EMISSIONS	
Source	**Details**
Road traffic emissions	With regard to emissions from road traffic, the assessment considers the potential impact of emissions associated with the operational phase. Estimating the contribution of the proposal site to existing annual average daily traffic (AADT) flows on the local road network has been performed based on measured 2021 traffic flows on Elizabeth Drive, Abbotsbury (RMS traffic counter 64022) which is the closest traffic counter location to the proposal site. The calculated AADT flows on surrounding roads during operation, including the addition of the flows associated with the proposal are anticipated to be approximately 30, 772 vehicles. To evaluate the significance of the estimated changes in operational traffic flows, reference has been made to the Environmental Protection UK (EPUK) document "Development Control: Planning for Air Quality (2010 Update)" (EPUK, 2010) which has been referenced in lieu of any identified NSW or Australian guidance. The guidance provides threshold criteria for evaluating the significance of changes in traffic, as a traffic flow change of more than 5 % to 10 % on roads with AADT of >10 000 vehicles required to be assessed through quantitative methods (i.e. dispersion modelling). The criteria outlined in EPUK (2010) provide a screening (i.e. qualitative) level of assessment which considers the potential for adverse air quality impacts based on traffic flows. As estimated in the scoping report, the anticipated changes in traffic account for approximately 3.9 % of existing traffic flow, and therefore do not exceed that threshold. Based on this screening approach it is not considered likely that the impacts associated with the Proposal would lead to significant changes in the existing traffic flow or adverse impacts during the operational phase. In accordance with the adopted guidance, the qualitative assessment screens that potential risk and a quantitative assessment is not considered to be warranted. Potential impacts of operational phase traffic emissions would be managed through the Operational Environment Management Plan, including a Traffic Management Plan.
Vehicle idling emissions	Idling emissions may vary from road traffic emissions by nature of the operation of the truck engines. Vehicle engines delivering goods to the Proposal site will typically be hot, as they will have completed the journey from their point of origin. Hot idling engines will tend to heat further whilst idling due to the low rate of air drawn through the radiator, and correspondingly emissions of NO_X will tend to increase. As the engines are hot and consuming low rates of fuel, emissions of CO and PM will similarly tend to decrease. Standard practice is for stationary vehicles to switch off engines once in position for loading / unloading. Emissions from idling emissions have not been assessed and may be managed effectively through the control measures outlined below.
Commercial kitchen emissions	The proposal includes the operation of commercial kitchen activities including the manufacturing of potato and corn products. Emissions from a commercial kitchen will vary rapidly and significantly in composition depending on the cooking processes being used. From an environmental perspective, emissions to atmosphere from kitchen exhaust ventilation systems are typically associated with odour and particulates (i.e. smoke). Cooking processes may also give rise to emissions of a range of air pollutants associated with the combustion of fuel including NO_X, CO, CO_2 and a range of organics including VOCs, semi-volatile organic

TABLE 25: IDENTIFIED POTENTIAL SOURCES OF OPERATIONAL AIR EMISSIONS	
Source	**Details**
	compounds (SVOC) and aldehydes. Generally, these pollutants may become a potential hazard to health within poorly ventilated kitchen spaces, and controlled extraction from kitchen exhaust ventilation systems provides control to the potential for exposure of workers. Emissions of these pollutants at the rates anticipated from commercial kitchens is not considered to be significant from an environmental perspective. Odour is a complex mix of solid particles, aerosols and liquid droplets, and odour is an aggregated proxy measure for the control of all contributing solid phase and liquid phase emissions. The emissions of smoke and odour are generally inter-related, and in some cooking processes are so associated that they can be regarded as symptomatic of a general lack of exhaust treatment and control. In this context, the control of smoke is considered to be an intrinsic component of effective odour control as exposure to emissions of smoke may illicit an olfactometric response as well as an exposure to gaseous phase emissions. Effective odour control therefore must provide adequate control of smoke (particulates). Minor odour emissions may also be produced through the cleaning of kitchen areas. With reference to the NPI Emission Estimation Techniques Manual for Snack Foods Roasting and Frying Industry (NPI, 1999), it is noted that the principal emissions to air from batch frying would include VOCs, and PM10. These emissions would be experienced as odour and smoke. In total there will be 17 commercial kitchen emission sources to be operated as part of the Proposal, all of which will be discharged to atmosphere via short discharge stacks located at a height of 3 m above roof height. A number of these sources will have odour control provided by a series of after burning waste heat boilers to thermally oxidise emissions, and a subsequent heat exchanger for the recovery of heat prior to discharge to atmosphere. Kitchen odour emissions are considered as part of this assessment.
Boiler emissions	The operation of the boilers is expected to generate emissions of combustion pollutants such as NO_x and CO. Emissions of combustion gas emissions (as NO_X) from the boilers are considered as part of this assessment. Emissions of other pollutants (including CO, VOC) from gas-fired boilers are comparatively low compared to NO_X, and particulate emissions are extremely low.
Wastewater emissions	Wastewater at the proposal site will be treated in a wastewater treatment plant prior to discharge. Wastewater emissions are generally associated with odour and are therefore experienced as amenity impacts at sensitive receptors. The wastewater treatment plant is expected to comprise a small batch reactor, including mechanisms for filtration, separation and bio-absorption prior to discharge through commercial trade waste agreement to foul sewer. A previous odour impact assessment report (GHD, 2020) presents emissions data from the following existing wastewater treatment plant sources at the Blacktown facility, which are anticipated to be replicated at the subject site: ▪ Balance tank ▪ Settling tank 1 ▪ Settling tank 2 ▪ Settling tank 3 ▪ Dissolved Air Flotation (DAF) tank

TABLE 25: IDENTIFIED POTENTIAL SOURCES OF OPERATIONAL AIR EMISSIONS	
Source	**Details**
	Odour emissions from the wastewater treatment plant have been assessed. It is noted that whilst the commercial kitchen and the wastewater treatment plant both emit "odour" they are sufficiently different in character to assess individually.

6.1.5.2 Surrounding land sensitivity

To ensure that the selection of discrete receptors for the AQIA are reflective of the locations in which the population of the area surrounding the proposal site reside, population-density data has been examined.

Utilising the Australian Bureau of Statistics (ABS) population-density data based on the 2016 census, Northstar Air Quality have determined that the subject site and receptors are located in an area of 'low' population density (500 to 2,000 persons/km^2), which would be expected given the largely industrial activities of the immediate area.

Figure 21 AQIA Receptor Locations (Source: Northstar, 2021)

In accordance with the requirements of the NSW Environmental Protection Authority (EPA), several receptors have been identified and the receptors adopted for use within this AQIA are identified as follows:

R1 – 11 to 19 Distribution Drive, Orchard Hills (Industrial)
R2 – 10 to 12 Distribution Drive, Orchard Hills (Industrial)
R3 – 6 to 8 Distribution Drive, Orchard Hills (Industrial)
R4 – 11 to 19 Distribution Drive, Orchard Hills (Industrial)
R5 – 7 to 9 Distribution Drive, Orchard Hills (Industrial)
R6 – 573 to 577 Mamre Road, Orchard Hills (Residential)
R7 – 45 to 59 Sarah Andrews Close, Erskine Park (Industrial)
R8 – 35 to 44 Sarah Andrews Close, Erskine Park (Industrial)
R9 – 654 to 674 Mamre Road, Kemps Creek (Residential)
R10 – 657 to 703 Mamre Road, Kemps Creek (Residential)
R11 – 579A Mamre Road, Orchard Hills (Residential)
R12 – 1 to 27 Sarah Andrews Close, Erskine Park (Industrial)
R13 – 15 to 23 Quarry Road, Erskine Park (Industrial)
R14 – 25 to 31 Mandalong Close, Orchard Hills (Residential)
R15 – 65 to 73 Mandalong Close, Orchard Hills (Residential)
R16 – 108 Pine Creek Circuit, St Clair (Residential)

6.1.5.3 Existing air quality conditions

The air quality experienced at any location will be a result of emissions generated by natural and anthropogenic sources on a variety of scales (local, regional and global). The relative contributions of sources at each of these scales to the air quality at a location, will vary based on a wide number of factors including the type, location, proximity and strength of the emission source(s), prevailing meteorology, land uses and other factors affecting the emission, dispersion and fate of those pollutants.

When assessing the impact of any particular source of emissions on the potential air quality at a location, the impact of all other sources of an individual pollutant, should also be assessed. These 'background' (sometimes called 'baseline') air quality conditions will vary depending on the pollutants to be assessed and can often be characterised by using representative air quality monitoring data.

The subject site is located proximate to a number of air quality monitoring stations (AQMS) operated by NSW DPIE. These locations (listed by proximity) are discussed in Appendix B of the AQIA, which provides a detailed assessment of the background air quality monitoring data collected at the St Marys AQMS.

The closest active AQMS is noted to be located at St Marys and is generally considered to be the monitoring location most reflective of the conditions at the subject site.

A summary of the air quality monitoring data and assumptions used in this assessment are presented as follows:

TABLE 26: SUMMARY OF BACKGROUND AIR QUALITY USED IN THE AQIA

Pollutant	Ave Period	Units	Measured Value	Notes
Nitrogen dioxide (NO_2)	1-hour	$\mu g \cdot m^{-3}$	69.6	Hourly maximum 1-hr average in 2017
(St Marys)	Annual		8.0	Annual average in 2017

Given the nature of the immediate area, it has been assumed that the presence of odours of a similar nature to those associated with the proposed development are negligible.

The AQIA has been performed to assess the contribution of the proposed development/operations to the air quality of the surrounding area, and to ensure that no additional exceedances of the air quality criteria are experienced as a result of the proposed operations.

6.1.5.4 AQIA methodology

Operational phase emissions associated with the emission sources identified in the above subsections have been assessed through the performance of a dispersion modelling assessment.

A dispersion modelling assessment has been performed using the NSW EPA approved CALPUFF atmospheric dispersion model. The modelling has been performed in CALPUFF 2-dimensional (2-D) mode. Given the relatively small distances between the sources and nearest receptors, the uncomplicated terrain between the sources and receptors, a detailed assessment using a 3-dimensional (3-D) meteorological dataset is not warranted. The relevant meteorology is presented in Appendix A of the AQIA.

An assessment of the impacts of the proposed operation of activities at the subject site has been performed to characterises the likely day-to-day operation of the subject site, approximating average and maximum operational characteristics which are appropriate to assess against longer term (annual average) and shorter term (1-hour) criteria, respectively.

The modelling scenarios provide an indication of the air quality impacts of the operation of activities at the subject site. Added to these impacts are background air quality concentrations (where relevant and available) which represent the air quality that may be expected within the area surrounding the subject site, without the impacts of the proposal itself.

The following provides a description of the determination of appropriate emissions of air pollutants resulting from the operation of the proposed development.

Emission estimation:

The emissions from the following sources have been quantitatively assessed:

- Commercial kitchen emissions: emissions from food manufacturing activities at the subject site, which are largely extracted and ducted to after-burning waste heat boilers prior to discharge to atmosphere;
- Boiler emissions: emissions from the operation of gas-fired boilers, operated for the purpose of generating hot water for cooking purposes (e.g. cooking corn); and
- Wastewater emissions: emissions from wastewater treated prior to discharge from the subject site.

The emissions inventory is presented in Appendix D of the AQIA.

Short term impacts:

The evaluation of odour impacts requires the estimation of short or peak concentrations on the time scale of less than one hour, and dispersion model outputs are limited by the resolution of the input meteorological data (1-hour). Dispersion models therefore need to be supplemented to accurately simulate atmospheric dispersion of odours and the instantaneous perception of odours by the human nose. The prediction of peak concentrations from estimates of ensemble means can be obtained from a ratio between extreme short-term concentration and longer-term averages. Properly defined peak-to-mean ratios (P/M60) depend upon the type of source, atmospheric stability and distance downwind. The NSW EPA recommended factors for estimating peak concentrations for various source types in different atmospheric conditions are presented as follows and adopted within the AQIA, as appropriate.

TABLE 27: FACTORS FOR ESTIMATING PEAK ODOUR CONCENTRATIONS

Source type	Pasquill-Gifford stability class	Near field P/M60	Far field P/M60
Area	A, B, C, D	2.5	2.3
	E, F	2.3	1.9
Line	A – F	6	6
Surface wake-free point	A, B, C	12	4
	D, E, F	25	7
Tall wake-free point	A, B, C	17	3
	D, E, F	35	6
Wake-affected point	A – F	2.3	2.3
Volume	A – F	2.3	2.3

Cumulative assessment of odour:

The potential odour emissions from the commercial kitchen and the wastewater treatment plant have both been assessed but assessed discretely from each other.

Reference is made to the Technical Framework for the assessment and management of odour from stationary sources in NSW (DECC, 2006), which states (p20):

> *To ensure that odour impacts are maintained within acceptable levels, odour emissions from an activity should be assessed against the glc criteria. Where several activities with similar odour character will result in a cumulative impact, the total of the odour emissions from all contributing activities needs to be considered.*

Odour emissions from the commercial kitchen processes and the wastewater treatment plant are not considered to be similar in character or nature and have been assessed independently. Both have been assessed and evaluated in a consistent and appropriate manner, but not as a cumulative impact as the odour impacts are not additive.

NO_X to NO_2 reactions:

The emission rates of oxides of NO_X have been modelled as nitrogen dioxide NO_2. Approximately 90 % - 95 % of NO_X from a combustion process will be emitted as NO, with the remaining 5 % - 10 % omitted directly as NO_2. Over time and after the point of discharge, NO in ambient air will be transformed by secondary atmospheric reactions to form NO_2, and this reaction often occurs at a considerable distance downwind from the point of emission, and by which time the plume will have dispersed and diluted significantly from the concentration at point of discharge.

AQIAs need to account for the conversion of NO to NO_2 to enable a comparison against the air quality criterion for NO_2. To perform this, various techniques are common, which are briefly outlined below:

- 100% conversion: the most conservative assumption is to assume that 100% of the total NO_X emitted is discharged as NO_2, and that further reactions do not occur.
- Jansen method: where the location is represented by good monitoring data for NO and NO_X, the empirical relationship between NO and NO_2 may be used to derive 'steady state' relationships.
- Ozone limiting method: this method uses contemporaneous ozone data to estimate that rate at which NO is oxidised to NO_2 hour-on-hour using an established relationship.

This AQIA has adopted the conservative 100 % NO_X to NO_2 conversion method.

6.1.5.5 Construction phase assessment

Construction phase activities have the potential to generate short-term emissions of particulates. Generally, these are associated with uncontrolled (or 'fugitive') emissions and are typically experienced by neighbours as amenity impacts, such as dust deposition and visible dust plumes, rather than associated with health-related impacts. Localised engine-exhaust emissions from construction machinery and vehicles may also be experienced but given the very minor scale of the proposed works, fugitive dust emissions would have the greatest potential to give rise to downwind air quality impacts.

Modelling of dust from construction is generally not considered appropriate, as there is a lack of reliable emission factors from construction activities upon which to make predictive assessments, and the rates would vary significantly, depending upon local conditions. In lieu of a modelling assessment, the construction-phase impacts associated with the proposal have been assessed using a risk-based assessment procedure.

The advantage of this approach is that it determines the activities that pose the greatest risk, which allows the CEMP to focus controls to manage that risk appropriately and reduce the impact through proactive management.

For the risk assessment, Northstar has adapted a methodology presented in the IAQM Guidance on the Assessment of Dust from Demolition and Construction developed in the UK by the Institute of Air Quality Management (IAQM, 2014). Briefly, the adapted method uses a six-step process for assessing dust impact risks from construction activities, and to identify key activities for control.

After 'Step 1 Screening' (which excludes those receptors that are sufficiently distanced from construction phase activities to not warrant further assessment) risk is determined by the product of receptor sensitivity and the identified magnitude of impacts associated with the construction phase activities (construction, track-out, demolition and earthworks (as applicable)).

Screening based on separation distance:

The screening criteria applied to the identified sensitive receptors, are whether they are located in excess of:

- 50 m from the route used by construction vehicles on public roads.
- 350 m from the boundary of the site.
- 500 m from the site entrance.
- Track-out is assumed to affect roads up to 100 m from the site entrance.

Further to the above distance-based screening criteria, the construction activities are screened by the required construction activities.

The following table presents the identified discrete sensitive receptors, with the corresponding estimated screening distances as compared to the screening criteria.

TABLE 28: APPLICATION OF STEP 1 SCREENING

Rec	Location	Land Use	Screening Distance (m)		
			Boundary (350m)	Site Entrance (500m)	Construction route (50m)
R1	11-19 Distribution Drive, Orchard Hills	industrial (medium)	53	60	51
R2	10-12 Distribution Drive, Orchard Hills	industrial (medium)	20	128	60
R3	6-8 Distribution Drive, Orchard Hills	industrial (medium)	56	246	150
R4	11-19 Distribution Drive, Orchard Hills	industrial (medium)	298	330	61
R5	7-9 Distribution Drive, Orchard Hills	industrial (medium)	266	459	161
R7	45-59 Sarah Andrews Close, Erskine Park	industrial (medium)	81	291	7
R8	35-44 Sarah Andrews Close, Erskine Park	industrial (medium)	355	594	138
R9	654-674 Mamre Road, Kemps Creek	residential	691	922	461
R10	657-703 Mamre Road, Kemps Creek	residential	753	949	522
R11	579A Mamre Road, Orchard Hills	residential	694	704	476
R12	1-27 Sarah Andrews Close, Erskine Park	industrial (medium)	254	477	187
R13	15-23 Quarry Road, Erskine Parke	industrial (medium)	287	475	99
R14	25-31 Mandalong Close, Orchard Hills	residential	477	603	299
R15	65-73 Mandalong Close, Orchard Hills	residential	555	672	628
R16	108 Pine Creek Circuit, St Clair	residential	1 146	1 285	5 10

With reference to the above, sensitive receptors are noted to be within the screening distance thresholds and therefore require further risk assessment as summarised as follows:

TABLE 29: APPLICATION OF STEP 1 SCREENING

Construction Impact	Screening Criteria	Step 1 Screening	Comments
Demolition	350 m from boundary 500 m from site entrance	Not screened	Receptors identified within the screening distance
Earthworks	350 m from boundary 500 m from site entrance		
Construction	350 m from boundary 500 m from site entrance		
Trackout	100 m from site entrance		
Construction Traffic	50 m from roadside		

Risk assessment:

Given the sensitivity of the identified receptors is classified as low for dust soiling, and high for health effects, and the dust emission magnitudes for the various construction phase activities, the resulting risk of air quality impacts (without mitigation) is as presented below.

TABLE 30: PRE-MITIGATED RISK OF AIR QUALITY IMPACTS FROM CONSTRUCTION ACTIVITIES

Impact	Sensitivity of Area	Dust Emission Magnitude					Pre-mitigated Risk				
		Demolition	Earthworks	Construction	Track-out	Const. Traffic	Demolition	Earthworks	Construction	Track-out	Const. Traffic
Dust Soiling	Low	Med.	Large	Large	Large	Large	Low	High	High	High	High
Human Health	High	Med.	Large	Large	Large	Large	Med.	High	High	High	High

Note: med. = medium

The risks summarised above show that there is a high pre-mitigated risk of both dust soiling and human health impacts associated with construction activities if no mitigation measures were to be applied to control emissions associated with construction-phase activities.

The risk assessment therefore provides recommendations for construction phase mitigation, as detailed within **Section 6.1.5.7** of this EIS.

6.1.5.6 Operational assessment

This section presents the results of the dispersion modelling assessment and uses the following terminology:

- Incremental impact – relates to the concentrations predicted as a result of the operation of the proposal in isolation.
- Cumulative impact – relates to the concentrations predicted as a result of the operation of the proposal PLUS the background air quality concentrations.

The results are presented in this manner to allow examination of the likely impact of the proposal in isolation and the contribution to air quality impacts in a broader sense.

In the presentation of results, the tables included shaded cells which represent the following:

Model prediction	Pollutant concentration / deposition rate less than the relevant criterion	Pollutant concentration / deposition rate equal to, or greater than the relevant criterion

The meteorological year adopted within dispersion modelling is 2017.

Commercial kitchen emissions assessment:

Presented below are the 99th percentile 1-second average odour concentrations predicted at the surrounding receptor locations, as a result of the proposed operation of the commercial kitchen emission sources. The predicted 99th percentile 1-second nose response time odour concentrations are compared against the relevant odour assessment criterion.

TABLE 31: COMMERCIAL KITCHEN EMISSIONS PREDICTED 99TH % ODOUR CONCENTRATIONS

Receptor	Land use	99.9th percentile 1-second average odour (OU)		
		Incremental Impact	Criterion	Compliance / Non-compliance
R1	Industrial	3.4	7	Compliance
R2	Industrial	5.6	7	Compliance
R3	Industrial	4.0	7	Compliance
R4	Industrial	1.5	7	Compliance
R5	Industrial	1.7	7	Compliance
R6	Residential	1.6	2	Compliance
R7	Industrial	4.4	7	Compliance
R8	Industrial	1.3	7	Compliance
R9	Residential	0.9	2	Compliance
R10	Residential	0.7	2	Compliance
R11	Residential	0.8	2	Compliance
R12	Industrial	1.9	7	Compliance
R13	Industrial	1.4	7	Compliance
R14	Residential	1.0	2	Compliance
R15	Residential	0.8	2	Compliance
R16	Residential	0.4	2	Compliance

These results indicate that the anticipated odour emissions from the commercial kitchen processes are not anticipated to cause offensive odour impacts.

Boiler emissions:

Results are presented in this section for the predictions of NO_2.

The conversion of NO_X to NO_2 has been assumed to be in accordance with Method 1 of the NSW EPA Approved Methods, assuming a 100 % conversion from NO_X to NO_2. A Level 1 assessment has been performed which uses the maximum hourly model predictions of NO_X and the maximum hourly measured NO_2 concentration at the St Marys AQMS in 2017.

Presented above are the predicted 1-hour and annual average incremental and cumulative NO_2 concentrations at the surrounding receptor locations.

TABLE 32: BOILER EMISSIONS PREDICTED 1-HR AND ANNUAL AVERAGE NO_2 CONCENTRATIONS

Rec.	Nitrogen dioxide (NO_2) concentration ($\mu g \cdot m^{-3}$)						Compliance / non-compliance
	1-hour			Annual Average			
	Increment	Background	Cumulative	Increment	Background	Cumulative	
R1	8.1	69.6	77.7	0.1	8.0	8.1	Compliance
R2	15.1	69.6	84.7	1.0	9.0	10.0	Compliance
R3	7.5	69.6	77.1	0.5	10.0	10.5	Compliance
R4	10.9	69.6	80.5	0.1	11.0	11.1	Compliance
R5	10.5	69.6	80.1	0.2	12.0	12.2	Compliance
R6	11.6	69.6	81.2	0.3	13.0	13.3	Compliance

R7	15.7	69.6	85.3	1.0	14.0	15.0	Compliance
R8	7.6	69.6	77.2	0.1	15.0	15.1	Compliance
R9	7.9	69.6	77.5	0.1	16.0	16.1	Compliance
R10	9.0	69.6	78.6	0.1	17.0	17.1	Compliance
R11	10.0	69.6	79.6	0.1	18.0	18.1	Compliance
R12	8.1	69.6	77.7	0.2	19.0	19.2	Compliance
R13	8.1	69.6	77.7	0.3	20.0	20.3	Compliance
R14	9.2	69.6	78.8	0.1	21.0	21.1	Compliance
R15	7.7	69.6	77.3	0.1	22.0	22.1	Compliance
R16	6.8	69.6	76.4	<0.1	23.0	23.0	Compliance
Criterion	-	**246**		-	**62**		

These results do not predict any exceedance of the 1-hour or annual average NO_2 criteria.

Wastewater treatment plant emissions:

Presented below are the 99th percentile 1-second average odour concentrations predicted at the surrounding receptor locations, as a result of the proposed operation of the wastewater treatment plant sources, treated by an odour control unit (OCU) and discharged in a controlled discharge point located 3 m above the roof of the building. The predicted 99th percentile 1-second nose response time odour concentrations are compared against the relevant odour assessment criterion.

TABLE 33: WWTP EMISSIONS: PREDICTED 99TH % ODOUR CONCENTRATIONS

Receptor	Land use	99.9th percentile 1-second average odour (OU)		
		Incremental Impact	Criterion	Compliance / Non-compliance
R1	Industrial	<0.1	7	Compliance
R2	Industrial	<0.1	7	Compliance
R3	Industrial	<0.1	7	Compliance
R4	Industrial	<0.1	7	Compliance
R5	Industrial	<0.1	7	Compliance
R6	Residential	<0.1	2	Compliance
R7	Industrial	<0.1	7	Compliance
R8	Industrial	<0.1	7	Compliance
R9	Residential	<0.1	2	Compliance
R10	Residential	<0.1	2	Compliance
R11	Residential	<0.1	2	Compliance
R12	Industrial	<0.1	7	Compliance
R13	Industrial	<0.1	7	Compliance
R14	Residential	<0.1	2	Compliance
R15	Residential	<0.1	2	Compliance
R16	Residential	<0.1	2	Compliance

These results indicate that the anticipated odour emissions from the wastewater treatment plant are not anticipated to cause offensive odour impacts.

6.1.5.7 Overview and recommendations

Based upon the assumptions presented in the report, the operation of the proposal is not anticipated to result in any exceedances (i.e. non-compliance) of the impact assessment criteria for odour or NO_2.

In terms of odour, emissions from the commercial kitchen operations and the wastewater treatment plant have been assessed discretely, as is appropriate for two odour sources of distinct character and nature. However, for assurance, it is also noted that the aggregation of the discrete impacts at all receptors from both sources would not give rise to any predicted exceedance of the odour assessment criteria.

Two odour criteria have been adopted for this assessment, as is appropriate for the varying levels of amenity to be expected across the assessment domain. The level of amenity expected at sensitive locations (for examples schools and hospitals) is naturally greater than would be expected at land designated for industrial uses. To reflect this, the 2 OU criterion has been applied to receptors at residential land uses (as is commonly required by NSW EPA) and 7 OU at industrial receptor locations. An odour performance goal of 7 OU is likely to represent the level below which "offensive" odours should not occur (for an individual with a 'standard sensitivity' to odours). Therefore, the Odour Technical Framework (DECC, 2006) recommends that, as a design goal, no individual be exposed to ambient odour levels of greater than 7 OU. It is therefore appropriate for the benchmark to be set at this level across the commercial / industrial land uses.

It is noted that the level of odour performance at the subject site (post development) is significantly better than currently operated at SBA Smithfield and Blacktown facilities, by way of more kitchen odour being controlled through waste heat boilers, and the installation of newer plant on some lines. It is noted that between July 2014 to September 2020, the Blacktown facility received only three odour complaints over that 6-year period and investigation of these complaints found that only one may have been directly associated with the facility (GHD, 2020).

It is therefore considered that the risk of off-site offensive odour is unlikely, however a range of odour monitoring and management measures are proposed.

Construction phase mitigation and monitoring:

The following represents a selection of recommended mitigation measures recommended by the IAQM methodology for a medium risk site for construction and construction traffic. A detailed review of the recommendations would be performed once details of the construction phase are available.

The following table lists the relevant mitigation measures identified by Northstar Air Quality.

TABLE 34: SITE-SPECIFIC CONSTRUCTION MANAGEMENT MEASURES

Identified Mitigation		Unmitigated Risk
1	Communications	High
1.1	Develop and implement a stakeholder communications plan that includes community engagement before work commences on site.	H
1.1	Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary. This may be the environment manager/engineer or the site manager.	H
1.2	Display the head or regional office contact information.	H

1.3	Develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the relevant regulatory bodies.	H
2	**Site Management**	**High**
2.1	Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken.	H
2.2	Make the complaints log available to the local authority when asked.	H
2.3	Record any exceptional incidents that cause dust and/or air emissions, either on- or offsite, and the action taken to resolve the situation in the log book.	H
2.4	Hold regular liaison meetings with other high-risk construction sites within 500 m of the site boundary, to ensure plans are coordinated and dust and particulate matter emissions are minimised. It is important to understand the interactions of the off-site transport/ deliveries which might be using the same strategic road network routes.	H
3	**Monitoring**	**High**
3.1	Undertake daily on-site and off-site inspections where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log available to the local authority when asked. This should include regular dust soiling checks of surfaces such as street furniture, cars and window sills within 100m of site boundary.	H
3.2	Carry out regular site inspections to monitor compliance with the dust management plan / CEMP, record inspection results, and make an inspection log available to the local authority when asked.	H
3.3	Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.	H
3.4	Agree dust deposition, dust flux, or real-time continuous monitoring locations with the relevant regulatory bodies. Where possible commence baseline monitoring at least three months before work commences on site or, if it a large site, before work on a phase commences.	H
4	**Preparing and Maintaining the Site**	**High**
4.1	Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible.	H
4.2	Erect solid screens or barriers around dusty activities or the site boundary that they are at least as high as any stockpiles on site.	H
4.3	Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period.	H
4.4	Avoid site runoff of water or mud.	H
4.5	Keep site fencing, barriers and scaffolding clean using wet methods.	H

4.6	Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site cover as described below	H
4.7	Cover, seed or fence stockpiles to prevent wind erosion	H
5	**Operating Vehicle/Machinery and Sustainable Travel**	**High**
5.1	Ensure all on-road vehicles comply with relevant vehicle emission standards, where applicable	H
5.2	Ensure all vehicles switch off engines when stationary - no idling vehicles	H
5.3	Avoid the use of diesel or petrol-powered generators and use mains electricity or battery powered equipment where practicable	H
5.4	Impose and signpost a maximum-speed-limit of 25 $km \cdot h^{-1}$ on surfaced and 15 $km \cdot h^{-1}$ on unsurfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authority, where appropriate	H
5.4	Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials.	H
5.5	Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing)	H
6	**Operations**	**High**
6.1	Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems	H
6.2	Ensure an adequate water supply on the site for effective dust/particulate matter suppression/ mitigation, using non-potable water where possible and appropriate	H
6.3	Use enclosed chutes and conveyors and covered skips	H
6.4	Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate	H
6.5	Ensure equipment is readily available on site to clean any dry spillages, and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.	H
7	**Waste Management**	**High**
7.1	Avoid bonfires and burning of waste materials.	H
8	**Measures Specific to Demolition**	**Medium**
8.1	Soft strip inside buildings before demolition (retaining walls and windows in the rest of the building where possible, to provide a screen against dust).	D

8.2	Ensure effective water suppression is used during demolition operations. Hand held sprays are more effective than hoses attached to equipment as the water can be directed to where it is needed. In addition, high volume water suppression systems, manually controlled, can produce fine water droplets that effectively bring the dust particles to the ground.	H
8.3	Avoid explosive blasting, using appropriate manual or mechanical alternatives.	H
8.4	Bag and remove any biological debris or damp down such material before demolition.	H
8.5	Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable.	D
8.6	Use Hessian, mulches or trackifiers where it is not possible to re-vegetate or cover with topsoil, as soon as practicable.	D
8.7	Only remove the cover in small areas during work and not all at once	D
9	**Measures Specific to Construction**	**High**
9.1	Avoid scabbling (roughening of concrete surfaces) if possible	H
9.2	Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place	H
9.3	Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery.	H
9.4	For smaller supplies of fine power materials ensure bags are sealed after use and stored appropriately to prevent dust	D
10	**Measures Specific to Track-Out**	**High**
10.1	Use water-assisted dust sweeper(s) on the access and local roads to remove, as necessary, any material tracked out of the site.	H
10.2	Avoid dry sweeping of large areas.	H
10.3	Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.	H
10.4	Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.	H
10.5	Record all inspections of haul routes and any subsequent action in a site log book.	H
10.6	Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned.	H
10.7	Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).	H
10.8	Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits.	H
10.9	Access gates to be located at least 10 m from receptors where possible.	H

11	Specific Measures to Construction Traffic (adapted)	High
5.1	Ensure all on-road vehicles comply with relevant vehicle emission standards, where applicable	H
8.3	Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery.	H
10.3	Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.	H
10.4	Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.	H
10.5	Record all inspections of haul routes and any subsequent action in a site log book.	H

Notes *D = desirable (to be considered), H = highly recommended (to be implemented), N = not required (although can be voluntarily implemented)*

For almost all construction activity, the adapted methodology notes that the aim should be to prevent significant effects on receptors through the use of effective mitigation and experience shows that this is normally possible.

Given the size of the proposal site, the distance to sensitive receptors and of the activities to be performed, residual impacts associated with fugitive dust emissions from the proposal would be anticipated to be 'negligible' for all activities.

The site-specific management measures outlined above identify a number of monitoring methods to reduce air quality impacts experienced by proximate receptors. These methods are listed below:

- Undertake daily on-site and off-site inspections where receptors (including roads) are nearby, to visibly observe dust levels, record inspection results, and make the log available to the local authority upon request. This should include periodic inspection of dust soiling on off-site surfaces such as street furniture, cars and windowsills within 100 m of site boundary.
- Carry out regular site inspections to monitor compliance with the dust management plan / CEMP, record inspection results, and make an inspection log available when requested.
- Increase the frequency of site inspections by the nominated accountable person when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.
- Record all inspections of haul routes and any subsequent action in a site log book.
- Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken.
- Record any exceptional incidents that cause dust and/or air emissions, either on- or offsite, and the action taken to resolve the situation in the log book.

Operational mitigation and monitoring:

This AQIA has utilised process-specific emissions data measured at the SBA Smithfield and Blacktown operations. Where relevant, those data have been adopted for the comparable processes at the Proposal site, and where insufficient data is held by the Applicant to quantify emissions, advice has been taken to establish conservative equivalence to fill any data gaps.

It is therefore recommended that NSW DPIE consider a recommendation to impose a condition for the Applicant to perform an emission testing program in accordance with the requirements of the EPL which will be required for the subject site. It is recommended that this would include periodic testing of:

- odour emissions from the various commercial kitchen processes;
- odour emissions from the wastewater treatment plant components and odour control efficacy testing of the OCU; and

- nitrogen dioxide emissions testing from the 2 no. 2 MW gas-fired condensing boilers.

It is recommended that the emissions testing program is commissioned and performed within the first three months of operation (post-commissioning).

It is further recommended that the emission testing reports are reviewed by a suitably qualified and experienced reviewer, and a clear summary is provided to Council, including a comparison of measured emission rates with those assumed in this AQIA. If there is significant variation, it is recommended that a further AQIA is performed to re-evaluate performance and provide additional recommendations for emission control if required.

A range of additional recommendations relating to air emission control are proposed, including:

- **Operational Environmental Management Plan**: The Applicant is recommended to develop an Operational Environmental Management Plan (OEMP) to address air emissions (including odour) with commitments for routine inspection of the LEV, fans and waste heat boiler operation to ensure adequate odour control is maintained
- **Daily odour observations**: Perform and record daily fence-line odour observations at relevant downwind boundary locations for at least the first three months of operation to ensure adequate odour control is achieved, and implement a management plan to manage any identified offensive odour;
- **Odour complaint procedure**: The Applicant should maintain and operate an environmental complaint procedure that includes suitable provision to record details of any odour complaints. The odour complaint procedure and associated complaint forms will be maintained in a proper fashion by management and will be made available for inspection by Council upon request. An example odour complaint form is appended to this report which may be used, or adapted for that purpose as required; and
- **No vehicle idling policy**: The Applicant should adopt a 'no idling' policy of all delivery vehicles at the Proposal site to minimise the potential of exhaust emissions from delivery vehicles;

6.1.6 Traffic and transport

This section of the EIS evaluates the traffic and transport aspects of the proposed development, in relation to the SEARs and addresses the following specific matters:

- ***details of all traffic types and volumes likely to be generated during construction and operation, including a description of key access / haul routes.***
- ***details on the relationship of traffic generation between the adjoining SSD-9429 and the development including pre and post-development traffic volumes.***
- ***an assessment of the predicted impacts of this traffic on road safety and the capacity of the road network, including consideration of cumulative traffic impacts at key intersections using SIDRA or similar traffic model.***
- ***plans demonstrating how all vehicles likely to be generated during construction and operation and awaiting loading, unloading or servicing can be accommodated on the site to avoid queuing in the street network.***
- ***details and plans of any proposed the internal road network, loading dock servicing and provisions, on-site parking provisions, and sufficient pedestrian and cyclist facilities, in accordance with the relevant Australian Standards.***
- ***details of the largest vehicle anticipated to access and move within the site, including swept path analysis.***
- ***swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site.***
- ***details of road upgrades, infrastructure works or new roads or access points required for the development if necessary.***

A robust Transport Assessment has been prepared by Ason Group, which includes a full assessment of all traffic and transport related impacts that may arise from the development proposed under this SSD Application. The Transport Assessment forms **Appendix 17** of this EIS.

6.1.6.1 Traffic types and volumes

Site Access Arrangements:

The site is proposed to be accessed to / from Distribution Drive via five (5) separate crossovers. The two existing access points to Lot 11 (to the south of the site) will be maintained with an additional three crossovers to the Lot 10 proposed (to the north-west of the site).

Existing:

- Southern 1: A full movement crossover for trucks and other heavy vehicles; and
- Southern 2: A full movement crossover for cars and other light vehicles as well as fire trucks.

Proposed:

- North-western 1: An entry only crossover for trucks up to 12.5m Heavy Rigid Vehicles (HRV);
- North-western 2: An exit only crossover for trucks up to 26m B-Doubles; and
- North-western 3: A full movement crossover for light vehicles and trucks up to 26m B-Doubles.

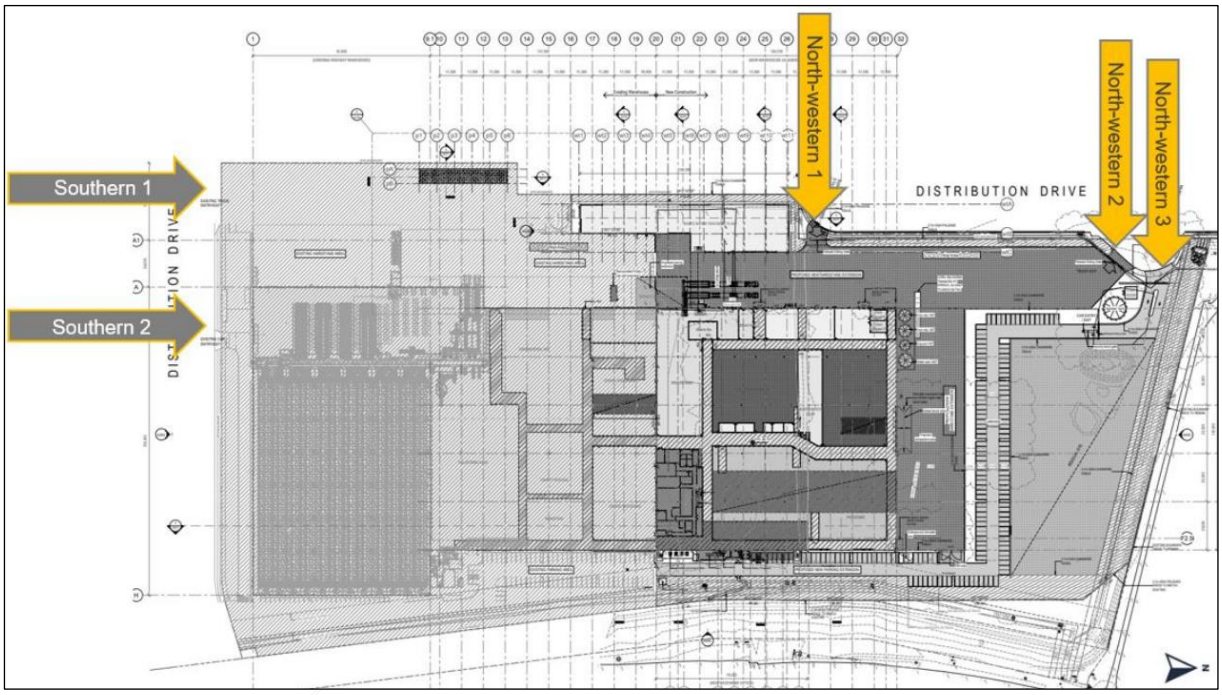


Figure 22 Site access strategy (Source: Ason Group, 2021)

Access strategies for both light and heavy vehicles have been demonstrated in **Figure 23** to **Figure 29**.

Heavy Vehicles Access Strategy:

Operationally, it is anticipated that:

- Trucks accessing the existing Lot 11 would still enter/exit via the existing southern 1 access.
- The majority of trucks (up to 26m B-doubles) accessing the proposed Lot 10 will enter via the existing southern 1 access driveway, and then exit via north-western 2 access.

Notably, the proposed north-western 1 access driveway is proposed as a secondary access for waste truck (12.5m HRV) use only. SBA has advised that the use of this access would be infrequent and appropriate on-site traffic management plan would be in place to prevent any potential queuing onto Distribution Drive. Additionally, north-western 3 access has been designed to accommodate heavy vehicle access for trucks up to 26m B-Doubles, which provides potential access to the residual land to the north of the site.

For heavy vehicle internal circulation, it is expected that:

- Trucks accessing the existing Lot 11 would still enter/exit via the existing southern 1 access.
- The majority of trucks (up to 26m B-doubles) accessing the proposed Lot 10 will enter via the existing Southern 1 access driveway, and then exit via north-western 2 access.
- The proposed north-western 1 access driveway is proposed as a secondary access for waste truck (12.5m HRV) to assess the proposed hardstand area. However, Ason Group has been advised that the use of this access would be infrequent and appropriate on-site traffic management plan would be in place to prevent any potential queuing onto Distribution Drive.

Light Vehicles Access Strategy:

A separate entry/exit access crossover has been proposed at the existing cul-de-sac of Distribution Drive as north-western 3 access to provide full movement accesses to/from the new Lot 10 car park.

However, noting that the new car park of Lot 10 is proposed as an extension of the existing car park of Lot 11, it is expected that all light vehicles will enter via the existing southern 2 access and exit via the north-western 3 access prior to the future extension of Distribution Drive and its connection to the existing signalised T-intersection of Mamre Road with James Erskine Drive.

Operational vehicle movements:

For a First-Principles assessment, reference is made to the indicative operational information supplied by SBA. Based on the information provided, SBA as a tenant (which includes operation of bot Lot 10 and Lot 11) is expected to generate the following vehicular trips:

TABLE 35: OPERATIONAL VEHICLE MOVEMENTS[1]

Time	Time Period	Light Vehicles	Heavy Vehicles	All Vehicles
AM Peak	8:00-9:00	69 (72)	15	84 (87)
PM Peak	15:00-16:00	83 (81)	15	98 (96)
Daily		760 (830)	360	1,120 (1,190)

Note: [1] Operational details during seasonal peak periods are provided in brackets.

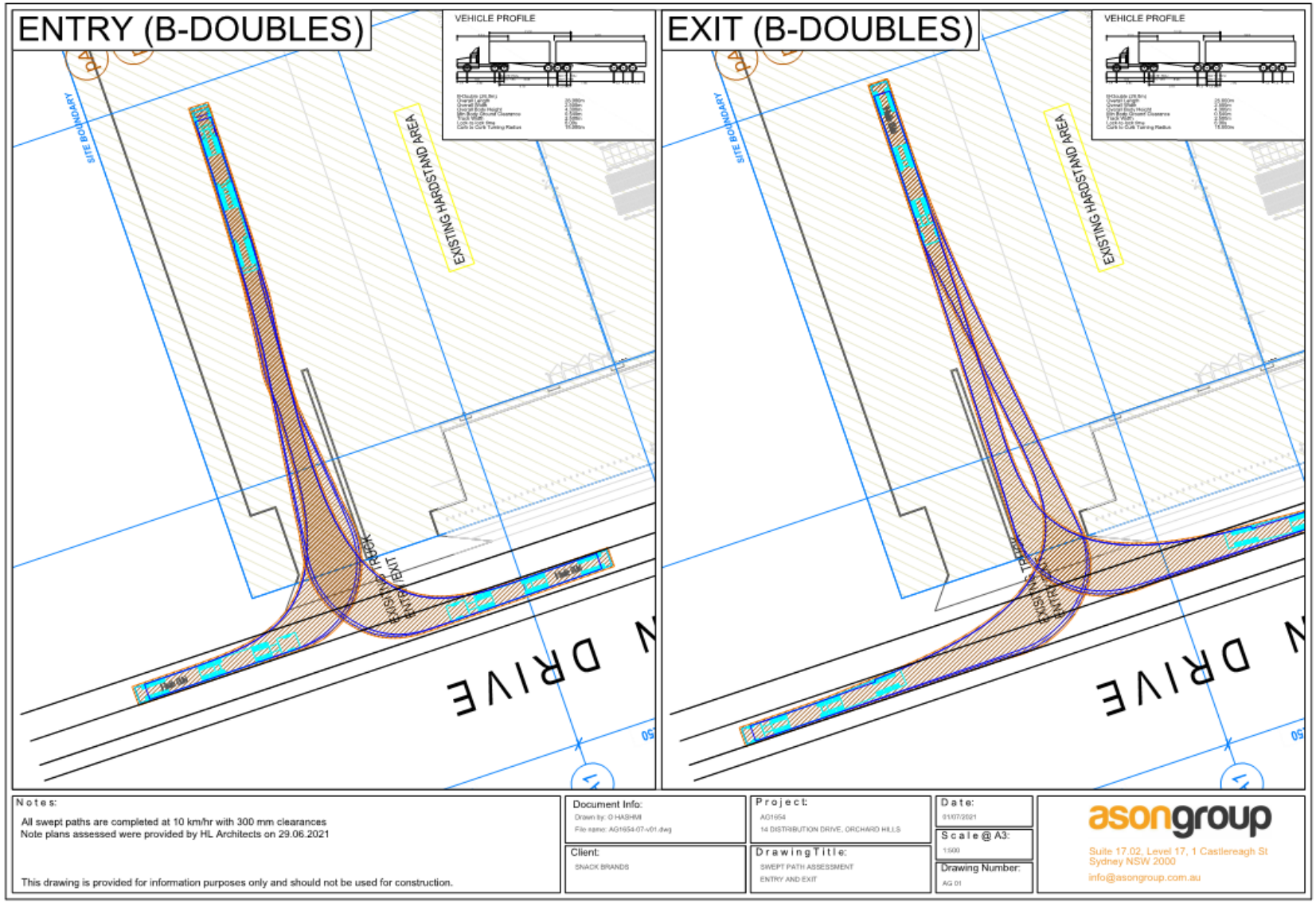


Figure 23 **Swept Path – entry and exit B-Double** (Source: Ason Group, 2021)

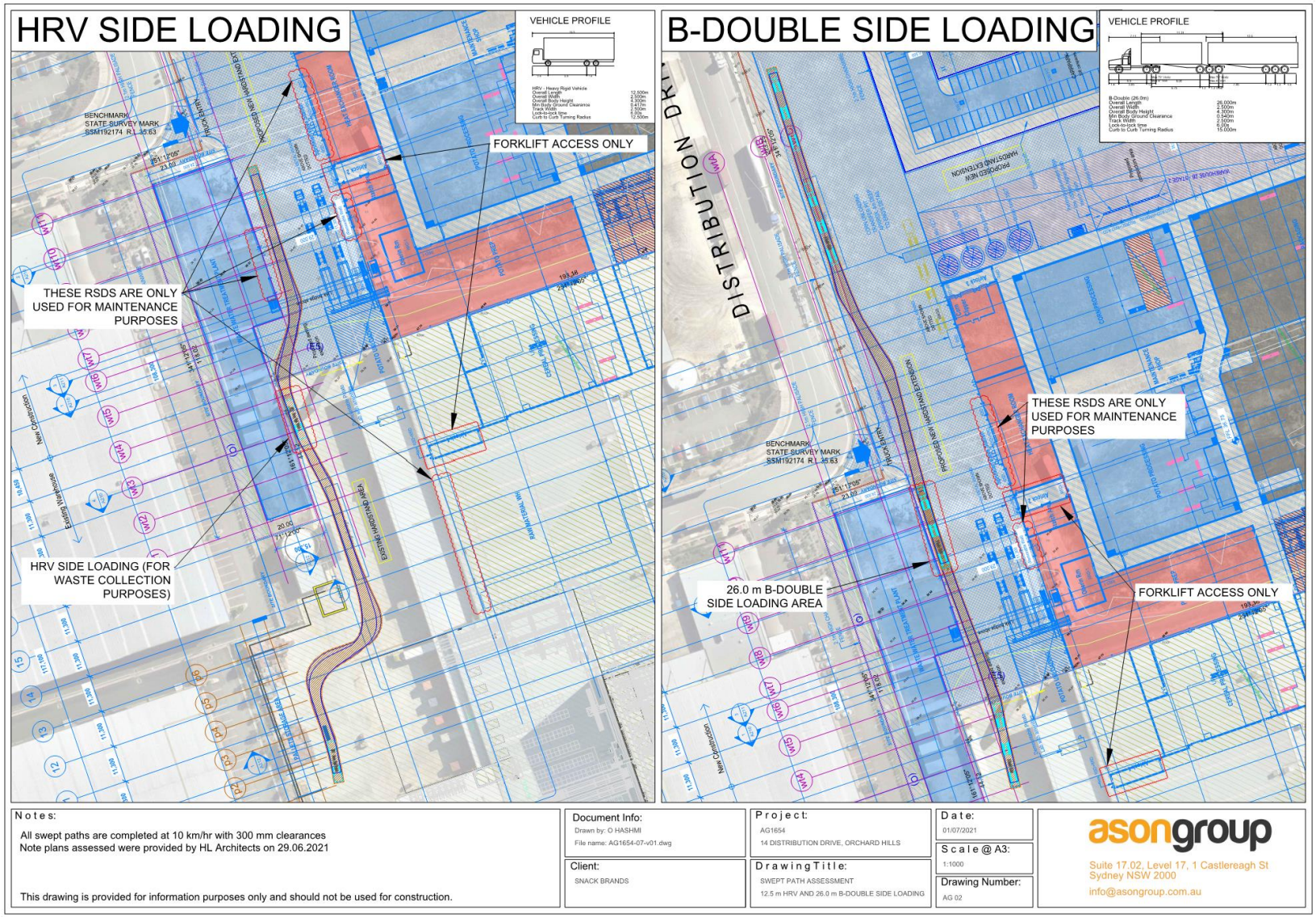


Figure 24 **Swept Path – HRV side loading and B-Double side loading** (Source: Ason Group, 2021)

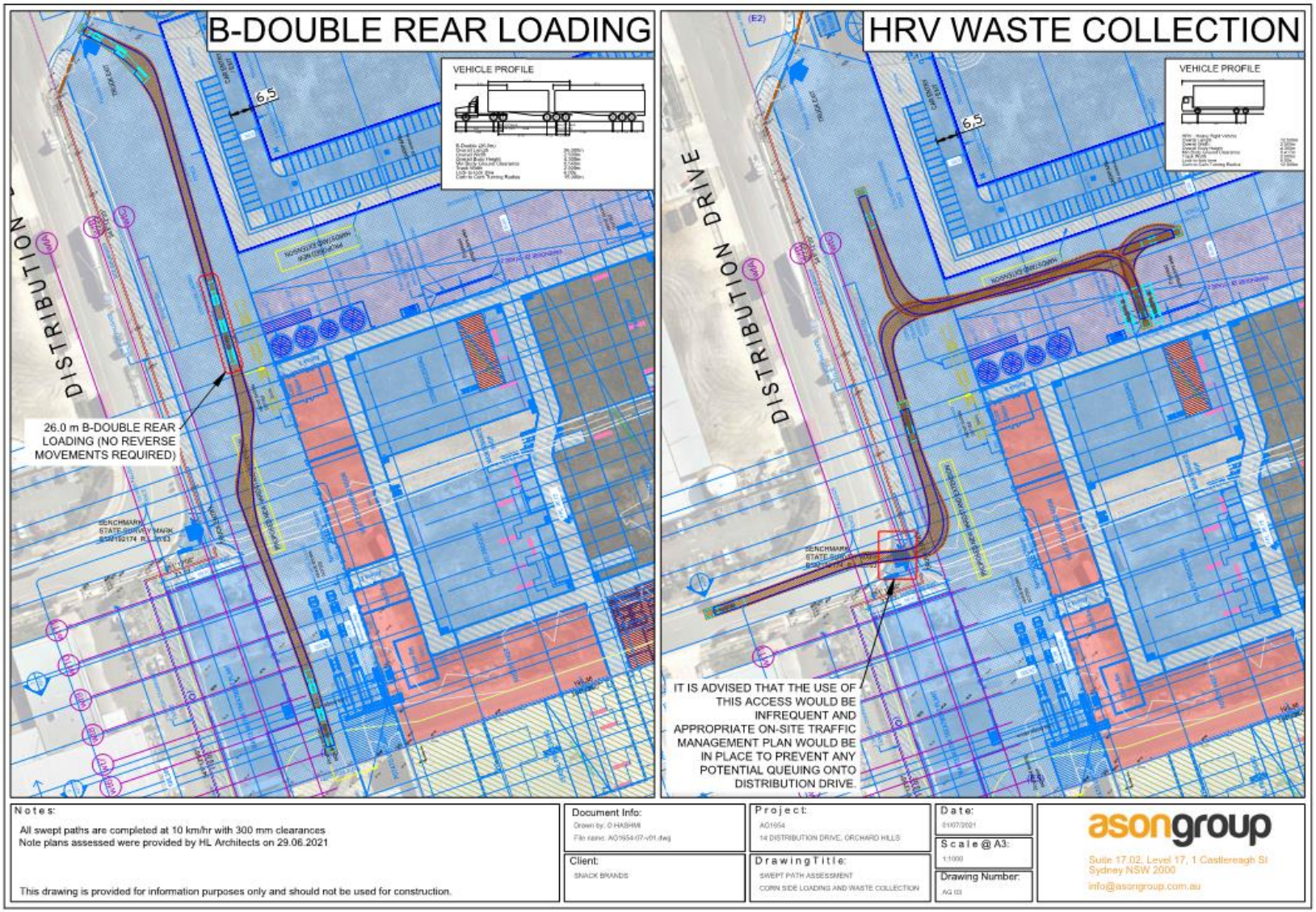


Figure 25 **Swept Path – B-Double rear loading and HRV waste** (Source: Ason Group, 2021)

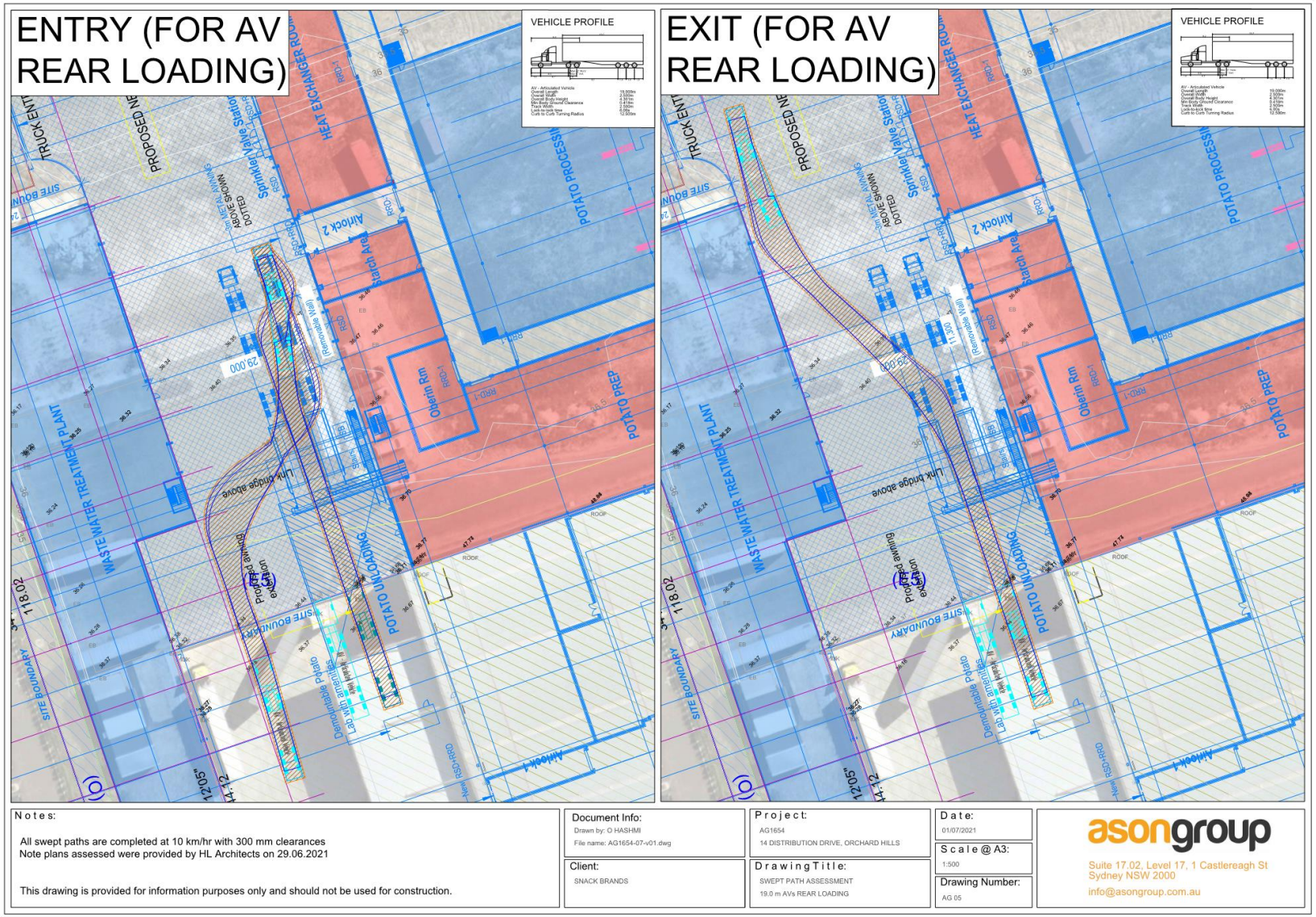


Figure 26 **Swept Path – AV rear loading** (Source: Ason Group, 2021)

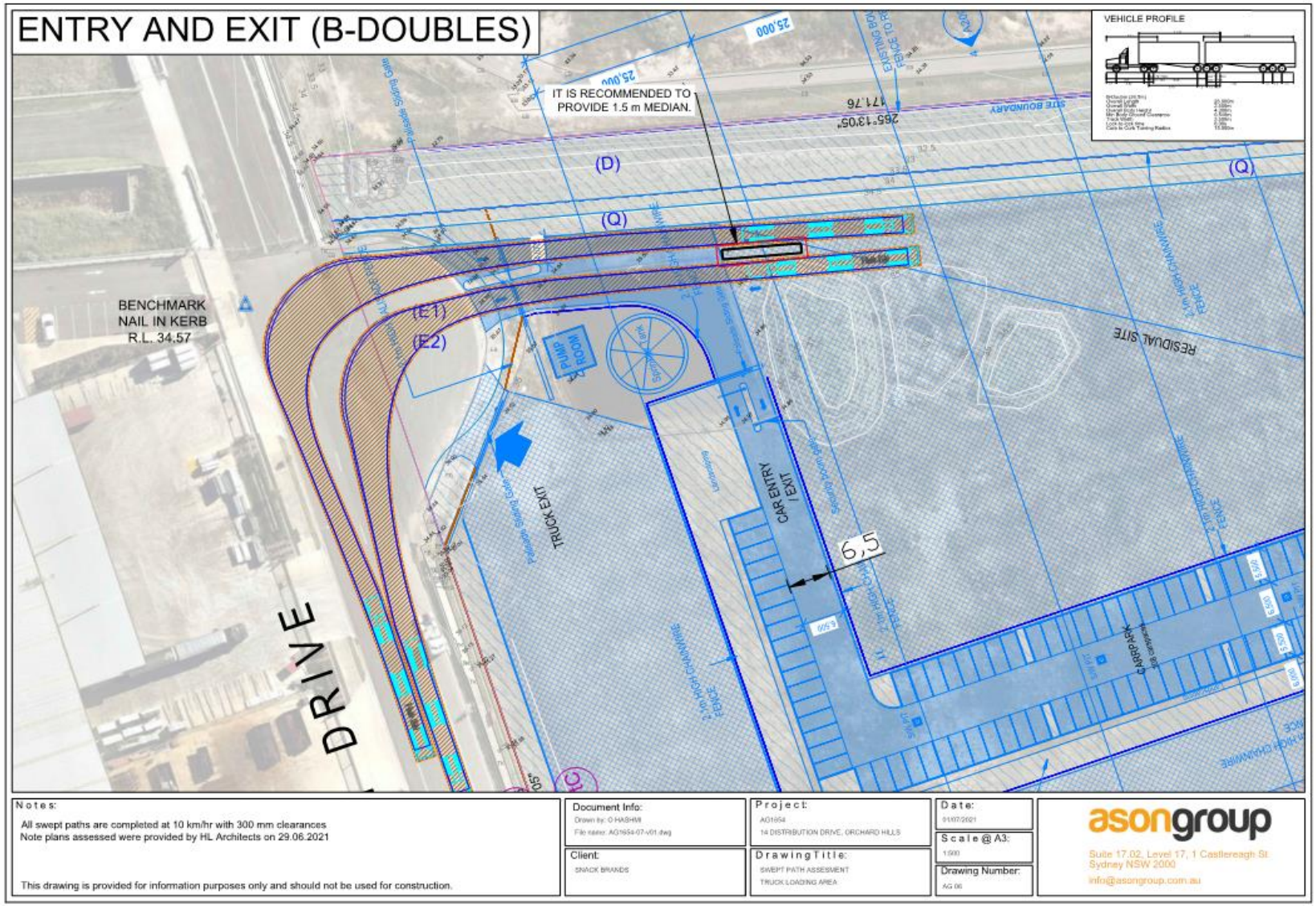


Figure 27 **Swept Path – Entry and exit B-Double** (Source: Ason Group, 2021)

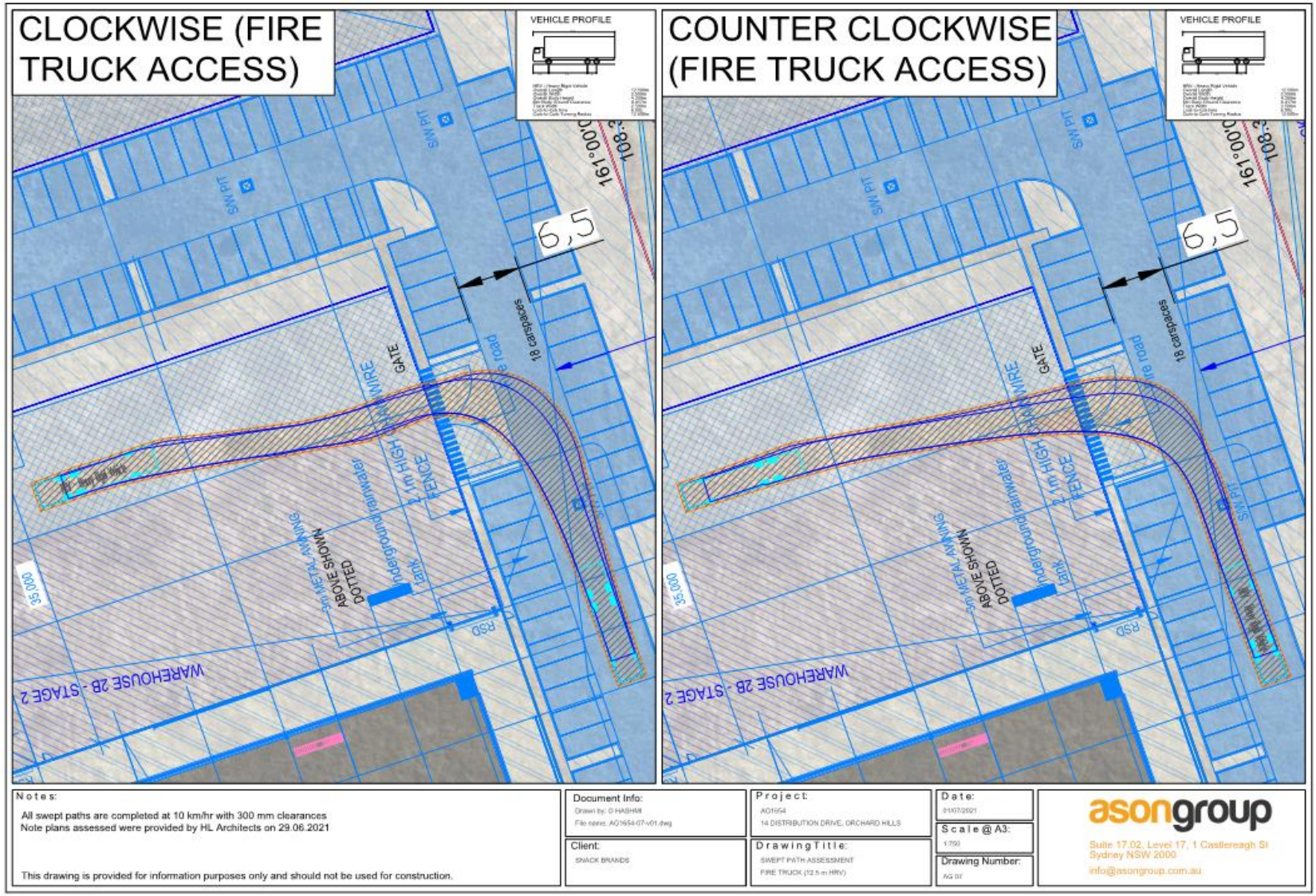


Figure 28 **Swept Path – Fire truck access** (Source: Ason Group, 2021)

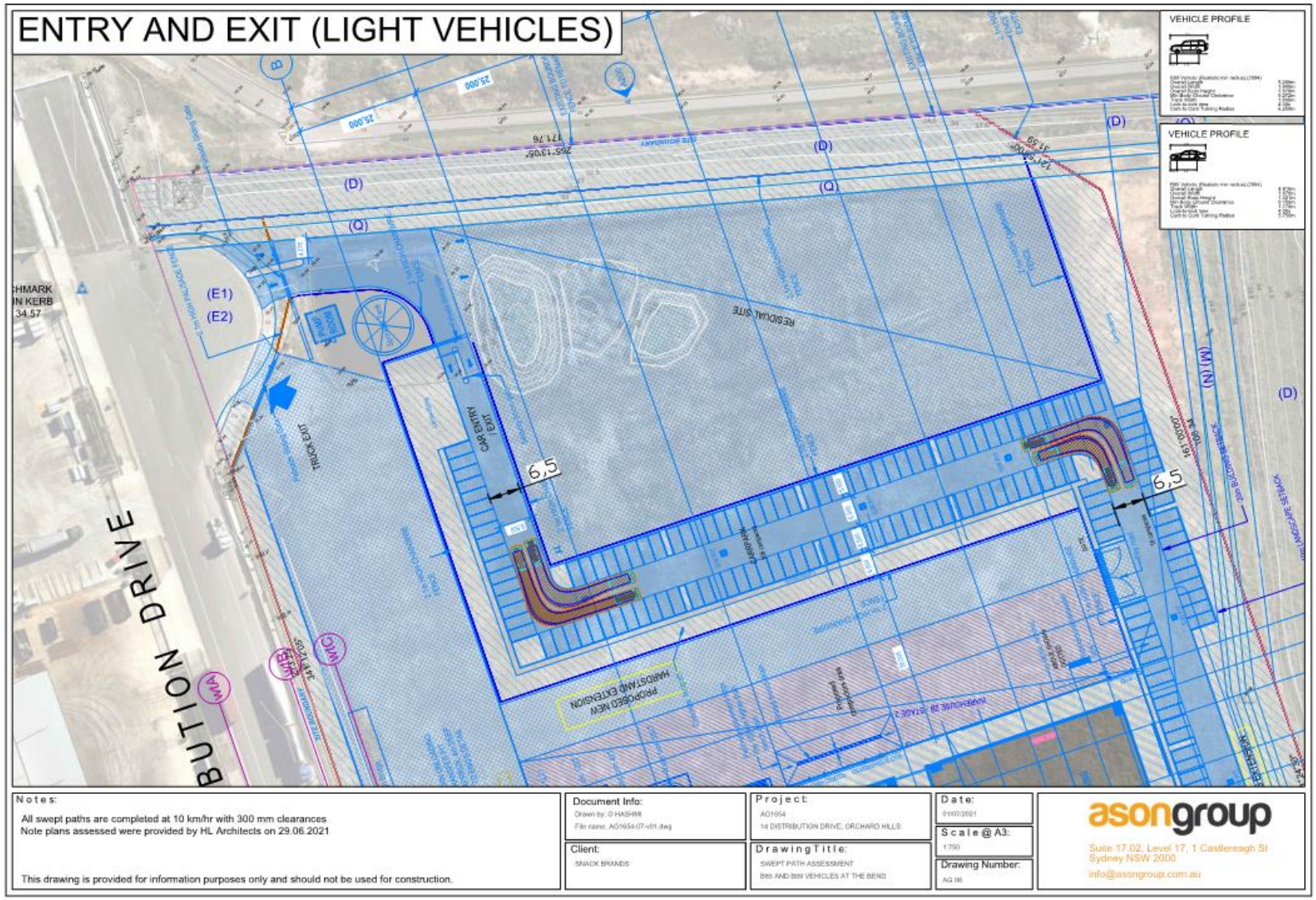
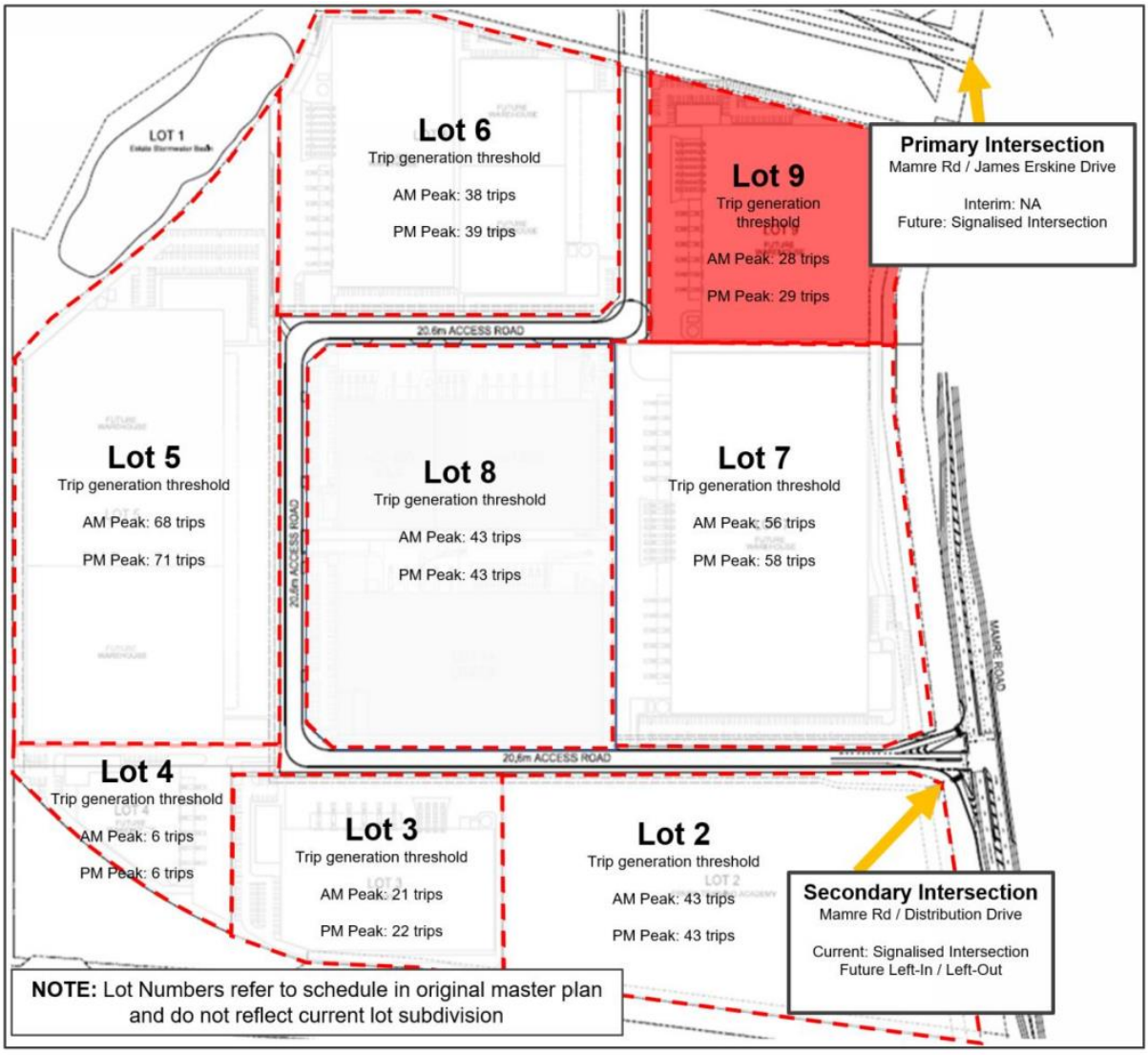


Figure 29 **Swept Path – Light vehicles** (Source: Ason Group, 2021)

6.1.6.2 Traffic generation comparison

The traffic generation from the various appropriate sources is presented in **TABLE 37** for the purposes of comparison against the approved First Estate Master Plan (SSD-7173) trip generation thresholds.

The First Estate Masterplan including the approved trip generation thresholds (SSD-7173) is shown in Figure 8 with the corresponding land use assumptions provided in **TABLE 36**. These yields have been adopted for all previous traffic assessments including the original First Estate Master Plan Approval (AG ref: 0124r04v2) and form the basis of the interim and future site access and network operation assessment in the vicinity.



Note: Labelled Lot 9 (now Lot 10) and Lot 7 (now Lot 11)

Figure 30 First Estate original Master Plan (SSD-7173) (Source: Ason Group, 2021)

Reference is made to the Roads and Maritime Services (RMS) Technical Direction 2013/04a – Guide to Traffic Generating Developments; Updated Traffic Surveys (RMS Guide TDT 2013/04a) to determine the appropriate trip rates for the First Estate Precinct.

The RMS Guide TDT 2013/04a provides surveys of industrial precincts across Sydney, including specific data for development within the Erskine Park Industrial Area and therefore provides the most appropriate rates for assessment.

In this regard, the following trip rates – as adopted and approved for the First Estate Master Plan (SSD-

7173) traffic generation assessment - in relation to the Erskine Park Industrial Area (total building including both warehouse and office components) are:

- 0.134 trips per 100m^2 GFA during the morning (AM) peak hour
- 0.139 trips per 100m^2 GFA during the evening (PM) peak hour
- 1.892 trips per 100m^2 GFA per day

This Transport Assessment for this proposed development adopts the approved trip rate assumptions from the RMS Guide TDT 2013/04a as stipulated above, with application of these rates to the adopted First Estate Master Plan Precinct development yields summarised in **TABLE 36**.

TABLE 36: FIRST ESTATE MASTER PLAN APPROVED TRAFFIC GENERATION

Lot	Warehouse Ref.	Total Built Area (m^2)	Morning (AM) Trips	Evening (PM) Trips	Daily Trips
Lot 1	Bio retention basins	N/A	-	-	-
Lot 2	Fire and Rescue NSW	-	91	91	-
Lot 3	Warehouse 3	16,000	21	22	303
Lot 4	Warehouse 4	4,250	6	6	80
Lot 5	Warehouse 5a	22,200	30	31	420
	Warehouse 5b	28,600	38	40	541
Lot 6	Warehouse 6a	6,900	9	10	131
	Warehouse 6b	8,200	11	11	155
	Warehouse 6c	20,200	27	28	382
Lot 7 (current Lot 11)	**Warehouse 7**	**41,500**	**56**	**58**	**785**
Lot 8	Warehouse 8a	11,400	15	16	216
	Warehouse 8b	9,400	13	13	178
	Warehouse 8c	22,160	30	31	419
Lot 9 (current Lot 10)	**Warehouse 9**	**21,200**	**28**	**29**	**401**
Total			**375**	**386**	**4,011**

With reference to **TABLE 36**, it is noted that, under this First Estate Precinct wide assessment, Lot 10 (formerly Lot 9) was assumed to have a potential developable floor area of some 21,200m^2 GFA. Accordingly, the approved Precinct-wide modelling adopts a traffic generation of 28 and 29 vehicles per hour during morning and evening peaks, respectively for Lot 10.

Based on the information provided, SBA as a tenant (which includes operation of bot Lot 10 and Lot 11) is expected to generate the following vehicular trips:

- AM peak hour: 84 veh/hr (87 veh/hr during seasonal peak periods)
- PM peak hour: 98 veh/hr (96 veh/hr during seasonal peak periods)
- Daily: 1,120 veh/day (1,190 veh/day during seasonal peak periods)

The nature of residual land near the northern boundary of the subject site is still undetermined; however, based on the information provided, it is understood that this residual land could potentially be used for truck parking (maximum 30 truck parking spaces), which may result in approximately 60 additional daily vehicular trips.

Notwithstanding, it should be noted that the use of this residual land is not included as part of this SSD application and the potential use for truck parking is not expected to result in any additional vehicular trips during morning and evening peak hours.

With consideration to the above, the traffic generation from the various appropriate sources is presented in Table 10 for the purposes of comparison against the approved First Estate Master Plan (SSD-7173) and approved Stage 1 SBA Warehouse (SSD-9429) by taking account the combined traffic generation potential of Lot 10 and Lot 11.

TABLE 37: TRIP GENERATION COMPARISON			
Site	**AM Peak Hour**	**PM Peak Hour**	**Daily**
Standard RMS Rate	80	83	1,130
Approved Threshold (SSD-7173)	84	87	1,186
Forecast Operation Generation	84 (87)	98 (96)	1,120 (1,190)

With reference to the above table, it is evident that the traffic generation forecasted by application of the RMS Rates is less than that of the approved First Estate Master Plan (SSD-7173) and SBA Stage 1 (SSD-9429) thresholds for Lot 10 and Lot 11 by 4 trips/hr in the morning peak and evening peak respectively. This difference is a result of the reduced area of Lot 10 and Lot 11 relative to the approved potential developable floor area.

Notwithstanding, based on the indicative operational information supplied by SBA, the proposed development (inclusive of the existing Lot 11 development), during normal operational period, is expected to generate in the order of 84 trips/hr and 98 trips/hr during the morning and evening peak hour periods, and 1,120 trips per day, which are marginally higher than the approved threshold by 11 trips/hr during the afternoon peak.

In referring to the assessment by First-Principles, the increases of this magnitude are considered minimal in the overall scheme and expected to have negligible impacts to the surrounding road network.

6.1.6.3 Traffic impact

The development traffic is above the approved thresholds by minor amounts such that it would be equivalent to increases of approximately 1 vehicle every 6 minutes during morning and afternoon peak hours.

Previous modelling as part of the planning for the overall First Estate Precinct concluded that the interim access arrangements to Mamre Road (prior to the upgrade of Mamre Road and James Erskine Drive to four legs) will operate with a Level of Service B during both peak periods – considered good operation in accordance with TfNSW approved intersection performance criteria.

On the basis of the above, it is anticipated that the road network would be more than adequate to cater for the traffic generated by the proposal. Accordingly, it is considered that no further road upgrades are required to support the proposed development.

Accordingly, it is expected that there is sufficient spare capacity within the existing and planned intersection designs to accommodate the traffic volumes generated by the proposal without causing any adverse impacts to the road network operations.

In summary, Ason Group is of the opinion that the proposal is supportable on traffic and transport impact grounds without any material impacts to the road network expected.

6.1.7 Urban design and visual

This section of the EIS evaluates the urban design and visual aspects of the proposed development, in relation to the SEARs and addresses the following specific matters:

- ***a visual impact assessment (including photomontages and perspectives) of the development layout and design (buildings and storage areas), including staging, site coverage, setbacks, open space, landscaping, height, colour, scale, building materials and finishes, façade design, signage and lighting, particularly in terms of potential impacts on:***
  - ***nearby public and private receivers***
  - ***significant vantage points in the broader public domain***
- ***consideration of the layout and design of the development having regard to the surrounding vehicular, pedestrian and cycling networks.***
- ***detailed plans showing suitable landscaping which incorporates endemic species including an assessment of the potential visual impacts of the project on the amenity of the surrounding area.***

6.1.7.1 Visual impact assessment

Geoscapes have prepared a Visual Impact Assessment in accordance with the Guidelines for Landscape and Visual Impact Assessment (GLVIA) – Third Edition, to assess the principal ways in which the proposed development is considered likely to interact with existing landscape and visual conditions as a result of the permanent introduction of an industrial food manufacturing facility. The detailed VIA is contained within **Appendix 8** of this EIS, and summarised as follows.

The nature of landscape and visual assessment requires both objective analysis and subjective professional judgement. Accordingly, the following assessment is based on the best practice guidance listed above, information and data analysis techniques, uses subjective professional judgement and quantifiable factors wherever possible and is based on clearly defined terms (refer to glossary). As stated in paragraph 1.20 of the GLVIA:

> "The guidance concentrates on principles while also seeking to steer specific approaches where there is a general consensus on methods and techniques. It is not intended to be prescriptive, in that it does not follow a detailed 'recipe' that can be followed in every situation. It is always the primary responsibility of any landscape professional carrying out an assessment to ensure that the approach and methodology adopted are appropriate to the particular circumstances."

The Visual Impact Assessment prepared by Geoscapes is considered to use a methodology and approach that is appropriate to this type of industrial development.

Receptor selections:

The visual impact from receptors has been assessed and the following list of visual receptors are judged to potentially have the highest sensitivity to the development:

- Approach from Mamre Road South, Orchard Hills (VP1)
- Junction of Mamre Road & James Erskine Dr, Orchard Hills (VP2)
- Cycleway Mamre Road, Orchard Hills (VP3)
- Mandalong Close, Orchard Hills (VP4)
- 25 Mandalong Close, Orchard Hills (VP5)
- 73 Mandalong Close, Orchard Hills (VP6)

Several residential dwellings along Mandalong Close have not been assessed for individual visual impact assessment, some landowners declined photographs being taken from their property or were simply not at home during the site visit. Due to landowners not being home at the locations of VP5 and VP6, previous viewpoint photographs have been reused from May 2020, these were taken at the time as part of a planning proposal study for another industrial development. Although the photographs were taken in 2020 the baseline has not changed significantly, since the photographs were taken, only small industrial units to the north of the CEVA development have been constructed. Therefore, these can be used again to assess potential visual impacts not only from VP5 and VP6 but can also act as representative views from other properties along Mandalong Close which are likely to experience a similar type of view.

Old McDonald's Childcare Centre is in close proximity to the northern site boundary however, during field work the owner declined to have a photograph taken from the rear of the property for the purposes of individual visual impact assessment. Even though this potential visual receptor will experience close range views of the development, there are a number of considerations that lead to a conclusion that the significance of any visual impacts received would be low or even negligible/none in the future. These are:

- The childcare centre is a commercial business which looks after children within the age ranges of approximately 6 months to 5 years of age. It is fair to assume that the view of the wider landscape from the outdoor play area or from windows of the building itself, would not be of high importance to the children. Parents and staff are likely to place higher importance on other factors rather than the scenic quality of views from the centre.
- The proposed development will be set against the backdrop of First Estate and more significantly the SB high bay. Therefore, the view has already been affected by significant industrial development. The addition of Snack Brands Stage 2 is likely to be much less significant when judging sensitivity and the magnitude of change at the receptor location.
- Land immediately to the south and west of the child care centre has been subject to potential rezoning proposals and this is described in the Mamre West DCP (Urbis Aug 2016). If the land was to be rezoned from RU2 to IN1 or IN2 then any views of the Snack Brands Stage 2 are likely to be completely screened by other industrial development.

Parts of Distribution Drive will experience views of the SBA Stage 2 development, however noting the surrounding context these views are not regarded to be particularly sensitive. Receptors are likely to be workers or people visiting the industrial estate and surrounding landscaping to streetscapes will present a high quality landscaping treatment.

It should be noted that the proposed development does include a landscape masterplan which has also been prepared by Geoscapes, this is intended to populate large landscape buffers to the east and north with native vegetation close to the site boundaries. Following maturity this will provide some screening and visual relief of the built form, particularly to the sensitive receivers along Mandalong Close and any transient receptors along Mamre Road.

A view of the development may be possible from areas on the perimeter of the Blue Mountains. However, this is approximately 12km from the development site. The visual impact from the Blue Mountains is assessed to be negligible/none.

Figure 31 **VIA Viewpoint Locations** (Source: Geoscapes, 2021)

Viewpoints:

Six (6) viewpoints were captured and assessed by Geoscapes, as depicted in **Figure 31**. A summary of the viewpoints analysis is provided within **TABLE 38** below.

VP1 receptor was selected for visual assessment as it represents the type of view that would be experienced by motorists traveling north along Mamre Road on approach to the development. The photograph was taken from the verge on the eastern side of the road opposite the Stage 1 SBA facility – refer to **Figure 32**.

Existing industrial development from First Estate can be seen within this view including Stage 1 Snack Brands and Voestalpine. The development site is situated in the centre of the view within the vacant land, further beyond is the access to Mandalong Stud Farm.

Figure 32 **VIA Viewpoint 1 – Photomontage** (Source: Geoscapes, 2021)

VP2 photograph (**Figure 33**) was taken from the pedestrian crossing at the intersection of James Erskine Drive and Mamre Road. Pedestrians, cyclists and motorists who are traveling along Mamre Road in a southerly direction or those waiting at the intersection would experience a similar view to the baseline image.

The SBA high bay is prominent within the view at this location. On the opposite side of Mamre Road the entrance to Mandalong Stud Farm is visible and further beyond buildings are seen within First Estate. The Stud Farm driveway marks the northern boundary of the proposed development site and to the right residential properties and agricultural lands are seen in the baseline photo. Views of the Blue Mountains are restricted due to elevation and existing development.

Figure 33 **VIA Viewpoint 2 – Photomontage** (Source: Geoscapes, 2021)

Figure 34 **VIA Viewpoint 3 – Photomontage** (Source: Geoscapes, 2021)

VP3 is located further north along Mamre Road with the baseline photograph taken from the eastern cycleway. Pedestrians, cyclists and motorists who are traveling south along Mamre Road would experience a similar view to the baseline image in **Figure 34**. In the foreground of the image the cycleway is seen extending south along Mamre Road, the Snack Brands high-bay and the site are visible beyond.

The baseline photograph for VP4 (**Figure 35**) was taken on the corner of Mandalong Close turning off from Mamre Road. This view might be experienced my motorists waiting at the junction or possibly pedestrians. In the foreground the view contains a large paddock, to the background the SBA high bay and other development from First Estate and Erskine Park are seen.

Figure 35 **VIA Viewpoint 4 – Photomontage** (Source: Geoscapes, 2021)

VP5 was selected to demonstrate the predicted visual impacts for residential properties to the north of the development, similar views would also be experienced from property No. 19 and 23 Mandalong Close. This view (**Figure 36**) is taken from land to the rear of No. 25, within a paddock. In the foreground it is evident that some tree planting has been carried out by the owner close to the property boundary. In the background the SBA high bay is seen, with the Old McDonald's Childcare Centre just in front. To the right of the image other buildings from First Estate South are visible, including the Project Blue Warehouse and Warehouse 6B.

Figure 36 **VIA Viewpoint 5 – Photomontage** (Source: Geoscapes, 2021)

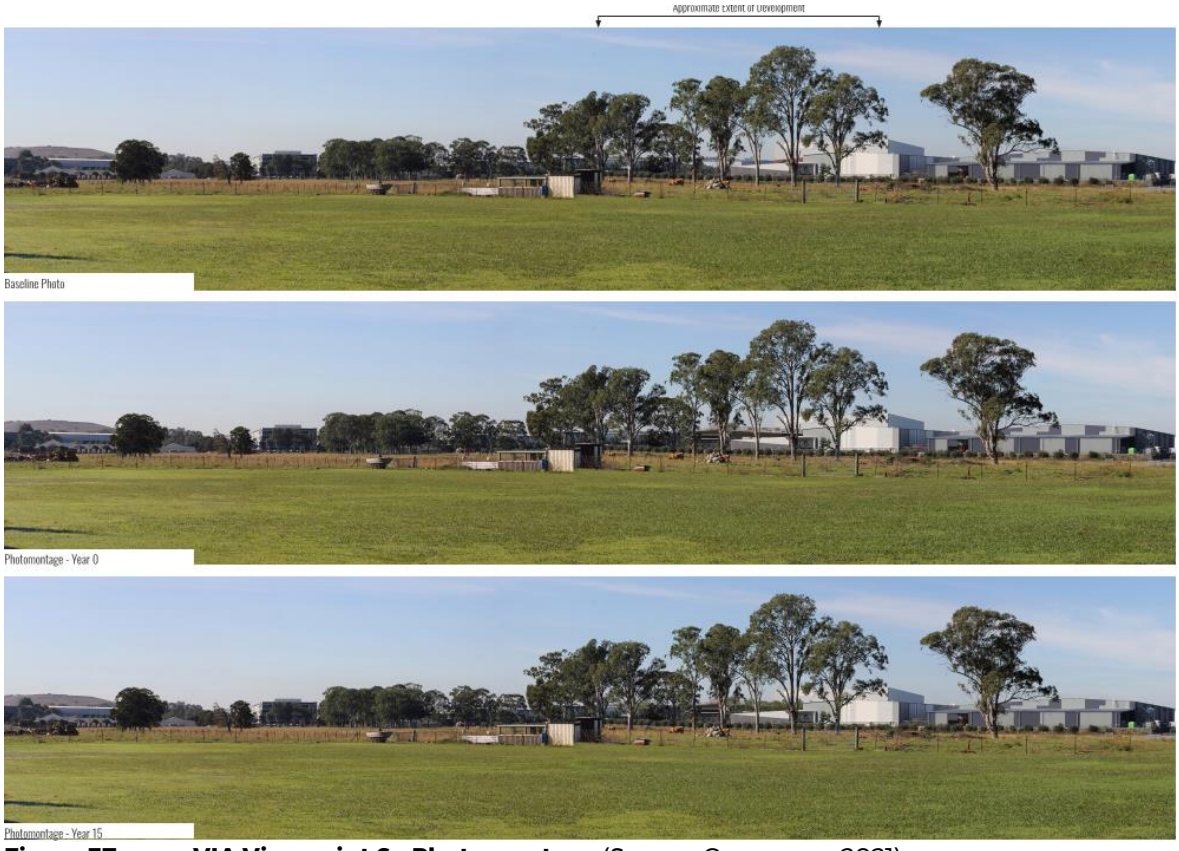


Figure 37 **VIA Viewpoint 6 – Photomontage** (Source: Geoscapes, 2021)

VP6 (**Figure 37**) was selected to demonstrate the predicted visual impacts for residential properties to the northwest of the development along Mandalong Close. Similar views would also be experienced from property No. 43, 53 and to a lesser extent No. 75 and 83. This view is taken from garden/land to the rear of No. 75. In the background, the SBA high bay is seen together with the Project Blue Warehouse and Warehouse 6B.

TABLE 38 summaries the findings of Geoscapes VIA.

TABLE 38: VISUAL IMPACT ASSESSMENT

Viewpoint	Receptor Sensitivity	Magnitude of Change	Significance of Impact
VP1 Approach from Mamre Road South, Orchard Hills - Looking Northwest	As the majority of people experiencing this view would be motorists views will be transient and for a short time period only. There is already a significant presence of industrial development within both First Estate and Erskine Park Estate. Therefore, the sensitivity has been judged to be **low**.	The proposed development will form a new and recognisable element within the view which is likely to be recognised by the receptor. Views are at close range with a moderate horizontal and/or vertical extent of the view affected. Landscaping at Year 15 is expected to soften and screen the eastern facade of the building. Therefore, it is judged that the residual magnitude of change is **medium**.	The significance of the visual impact at this location is judged to be **minor**.
VP2 Junction of Mamre Road & James Erskine Dr, Orchard Hills - Looking Southwest	Views will be transient and for a short time period only - similar to that of Viewpoint 1, there is already a significant presence of industrial development within both First Estate and Erskine Park Estate. Therefore, the visual sensitivity has been judged to be **low**.	The proposed development will form a new and recognisable element within the view which is likely to be recognised by the receptor. Views are at close range with a moderate horizontal and/or vertical extent of the view affected. Landscaping at Year 15 is expected to soften and screen the eastern facade of the building. Therefore, it is judged that the residual magnitude of change is **low**.	The significance of the visual impact at this location is judged to be **minor negligible**.
VP3 Cycleway Mamre Road, Orchard Hills - Looking South	Views will be transient and for a short time period only, similar to those of Viewpoint 1 and 2. There is already a significant presence of industrial development within both First Estate and Erskine Park Estate. Due the to the precedence of the cycleway, the visual	As can be seen in the photomontages in the shorter term at Year 0 the proposed development is clearly visible. The building will form a new and recognisable element within the view which is likely to be recognised by the receptor. However, following the maturity of landscape mitigation planting at year 15, the development becomes less	The significance of the visual impact of the proposed scheme at this location is judged to be **minor**.

TABLE 38: VISUAL IMPACT ASSESSMENT			
Viewpoint	**Receptor Sensitivity**	**Magnitude of Change**	**Significance of Impact**
	sensitivity has been judged to be **medium**.	apparent and presents a coherent vegetated screen. It is judged that the residual magnitude of change is **low**.	
VP4 Mandalong Close, Orchard Hills - Looking Northwest	It could be argued that this part of Mamre Road is less developed than others and industrial development is less apparent within the view due to the presence of scattered mature vegetation. Therefore, It is judged that the sensitivity of this visual receptor is **medium**.	The proposed development will form a minor constituent of the view being partially visible and a small component. It is in the majority, expected to be screened behind existing and proposed vegetation. Therefore, it is judged that the residual magnitude of change is **very low**.	The significance of the visual impact at this location is judged to be **minor negligible**.
VP5 25 Mandalong Close, Orchard Hills - Looking South	Views of the development are expected from within residential living spaces. Due the aspect and the elevation, the Blue Mountains are not as prominent and some existing industrial development can already be seen from First Estate. Although views have been affected by industrial development, residential receptors are often more critical regarding their views and these may be held in high regard by the owner, therefore, it is judged that the sensitivity of this visual receptor is **high**.	The proposed development will form a minor constituent of the view being partially visible and a small component. It is in the majority, expected to be screened behind existing and proposed vegetation. Therefore, it is judged that the residual magnitude of change is **very low**.	The significance of the visual impact at this location is judged to be **minor***.
VP6 73 Mandalong Close, Orchard Hills - Looking Southeast	Views of the development are expected from within residential living spaces. Due the aspect and the elevation, views to the Blue Mountains are not as prominent and some existing industrial development can already be seen from First Estate, although this is predominately screened by vegetation. Despite the presence of industrial development, the remaining view may be	The proposed development will form a minor constituent of the view being partially visible and a small component. It is in the majority, expected to be screened behind existing and proposed vegetation. Therefore, it is judged that the residual magnitude of change is **very low**.	The significance of the visual impact at this location is judged to be **minor***.

TABLE 38: VISUAL IMPACT ASSESSMENT			
Viewpoint	**Receptor Sensitivity**	**Magnitude of Change**	**Significance of Impact**
	held in high regard by the owner. Therefore, it is judged that the sensitivity of this visual receptor is **high**.		
* *NOTE:* *This visual receptor is located to the north of land which has been subject to proposals for rezoning to industrial use. if such proposals were to be approved, then any new development within the rezoned land would likely prevent views towards SBA. If Mandalong Close itself is rezoned to industrial, then residential receptors may be acquired for development any visual impacts assessed would no longer be of relevance.*			

Geoscapes conclude that the proposed development will create some visual impacts for receptors in close proximity to the site. However, the significance of these impacts is either low or negligible, due to the fact the proposal is located against the backdrop of the existing SBA high bay and other industrial development within the immediate surround context.

Through analysis conducted within the VIA, of the receptors assessed, the following locations are judged to receive **minor** visual impacts from the proposed development:

- Approach from Mamre Road South, Orchard Hills (VP1)
- Cycleway Mamre Road, Orchard Hills (VP3)
- 25 Mandalong Close, Orchard Hills (VP5)
- 73 Mandalong Close, Orchard Hills (VP6)

The following locations are judged to receive **minor negligible** visual impacts from the proposed development:

- Junction of Mamre Road & James Erskine Dr, Orchard Hills (VP2)
- Mandalong Close, Orchard Hills - Looking Northwest (VP4)

From analysis of aerial photography and mapping, it is evident that a number of residential properties along Mandalong Close and the Old McDonald's Childcare Centre will receive views of the development. However, the majority of these views are expected to be limited by existing vegetation and any visual impacts received are not judged to be significant due to the proposed development only affecting a small proportion of the view. Therefore, the proposed view would be very similar to the existing view (baseline).

Potential future rezoning of land immediately to the north of the development and between Old McDonald's Childcare Centre and Mandalong Close could result in new industrial development. This new development would likely completely screen the proposed development to any receptors in the north. Discussions have taken place between owners of properties along Mandalong Close regarding inclusion in the WSEA, if this were adopted then there is the possibility for visual receptors to the north of the site to no longer exist in the future.

The change in view is judged to be slightly larger from locations along Mamre Road at close range, such as the cycleway or roadway. The same statement can be applied to Distribution Drive within First Estate. However, the sensitivity of these locations is judged to be low due the presence of large scale industrial development within the immediate surrounding context and the type of users at these locations.

To help mitigate views particularly from the north and east, wide landscape buffer zones are present. Tree and shrub planting has been introduced to help provide screening of the development. This will allow for a mix of native and exotic tree planting that would be expected to reach a mature height of between 12 - 20m. This will help to screen and filter the built form from potential visual receivers.

The VIA photomontages demonstrate that proposed landscape planting at the development site can be effective in helping to reduce visual impacts for a number of sensitive locations. This will be most effective after 15 years and for those receptors who experience direct views at close to medium range.

6.1.8 Food safety

This section of the EIS evaluates the matters of food safety associated with the proposed development, as per the SEARs, in relation to food handling and processing and how NSW Food Authority standards and requirements will be met.

SBA currently has a Quality Management System and Hazard Analysis Critical Control Points (HACCP) plans for all current and proposed processes, which will be updated with any new equipment at the new facility.

Stage 1 of the development (including variety packing lines) has been HACCP certified and Safe Qualified Food (SQF), global food safety standard certified, which will be expanded to include certification for Stage 2 (including raw materials & manufacturing) once the site starts operating. Customer standards will also be implemented (CFMSR, WSE, Aldi) as per current SBA sites.

6.1.9 Waste

This section of the EIS evaluates the matters of waste associated with the proposed development, as per the SEARs, in particular:

- ***details of the quantities and classification of all waste streams to be generated on site during the development.***
- ***details of waste storage, handling and disposal during the development.***
- ***details of the measures that would be implemented to ensure that the development is consistent with the aims, objectives and guidance in the NSW Waste Avoidance and Resource Recovery Strategy 2014-2021.***

A Waste Management Plan has been prepared by SLR Consulting, to identify potential wastes to be generated by the proposed development during site preparation, construction and operation. This includes a description of how waste will be handled, processed and reused, recycled or managed in accordance with both the SEARs and Council requirements.

A copy of the Waste Management Plan is included in **Appendix 25** of this EIS.

6.1.9.1 Construction Waste

Construction waste types and quantities:

The Construction Site Manager will need to specify the types and quantities of waste produced during construction and on this basis, the numbers and capacity of bins can be determined.

In the absence of readily available construction waste generation rates from Council, SLR has adopted the waste generation rates from The Hills Development Control Plan (DCP) 2012 for estimating the type and quantities of waste generated from construction of the project.

It is anticipated that the project will provide enough space on-site for separate storage, for example, separate skip bins or appropriately managed stockpiles, of the following waste types:

- Bricks, concrete and scrap metal
- Metal and steel, in a condition suitable for recycling at metal recycling facilities
- Timber
- Glass
- Hardstand rubble
- Uncontaminated excavation spoil, if present
- Contaminated excavation spoil, if present
- Hazardous waste, if present
- Paper and cardboard

- General co-mingled recycling waste, and
- Non-recyclable general waste.

If there is insufficient space on-site for full segregation of waste types, the Site Manager, or equivalent role, should consult with the waste and recycling collection contractor to confirm which waste types may be co-mingled prior to removal from the site.

The project development will be carried out in accordance with the recommendations of the Waste Management Plan.

6.1.9.2 Operational Waste

Potential waste types, classification and management methods:

TABLE 39: WASTE TYPES, CLASSIFICATIONS AND MANAGEMENT METHODS FOR OPERATIONAL WASTE

Waste types	NSW EPA Classification	Proposed management method
General operations		
Clean office paper	General solid waste (non-putrescible)	Paper recycling at off-site licensed facility
Cardboard including bulky cardboard boxes	General solid waste (non-putrescible)	Cardboard recycling at off-site licensed facility
Recyclable beverage containers, glass and plastic bottles, aluminium cans, steel cans	General solid waste (non-putrescible)	NSW container deposit scheme 'Return and Earn', container recycling at off-site licensed facility
Food waste (staff/canteen)	General solid (putrescible) waste	Compost on or off-site or dispose to landfill with general garbage
Batteries	Hazardous waste	Off-site recycling, alternatively contact the Australian Battery Recycling Initiative for more information
Mobile phones	Hazardous waste	Off-site recycling; can be taken to the Mobile Muster program. Contact Mobile Muster for more information
Bulky polystyrene	General solid waste (non-putrescible)	Off-site recycling or disposal at landfill
Furniture	General solid waste (non-putrescible)	Off-site reuse or disposal to landfill
E-waste	Hazardous waste	Off-site recycling
Printer toners and ink cartridges	Hazardous waste	Off-site recycling, free disposal box or bags and pickup service exists for printer toners and ink cartridges
General garbage, including non-recyclable plastics and street sweepings	General solid (putrescible and non-putrescible) waste	Disposal at landfill
Maintenance		
Spent smoke detectors[1]	General solid waste (non-putrescible) or Hazardous waste (some commercial varieties)	Disposal to landfill, or off-site disposal at licensed facility

TABLE 39: WASTE TYPES, CLASSIFICATIONS AND MANAGEMENT METHODS FOR OPERATIONAL WASTE		
Waste types	**NSW EPA Classification**	**Proposed management method**
Glass, other than containers	General solid waste (non-putrescible)	Off-site recycling
Light bulbs and fluorescent tubes	Hazardous waste	Off-site recycling or disposal, contact FluoroCycle[2] or Lamp Recyclers[3] for more information
Cleaning chemicals, solvents, area wash downs, empty oil or paint drums, chemical containers	Hazardous waste if containers used to store DGs (Class 1, 3, 4, 5 or 8) and residues have not been removed by washing or vacuuming. General solid (non-putrescible) waste if containers cleaned by washing or vacuuming.	Transport to comply with the transport of DGs Code applies in preparation for off-site recycling or disposal at licensed facility
Garden organics - lawn mowing, tree branches, hedge cuttings, leaves	General solid waste (non-putrescible)	Reuse on-site or contractor removal for recycling at licenced facility
Production waste		
FFDC Dust (seasoning)	General solid waste (non-putrescible)	Off-site disposal at a licenced landfill facility
Reject intermediate (loose) and single pack product	General solid (putrescible) waste	Off-site animal feed or worm farm production at suitably licensed reprocessing or recycling facility or Off-site disposal at a licenced landfill facility
Waste raw product and agricultural offal (potato) including peel	General solid (putrescible) waste	Transported under CA05 Biosecure Transport and Treatment of Host Plant Material destined for recycling or waste (DPI 2017, ref INT17/91995) due to risk of potato cyst nematode to suitably licensed facility for heat treatment before reuse or disposal
Waste raw product and agricultural offal (corn)	General solid (putrescible) waste	Off-site disposal at a licenced landfill facility
Waste water treatment plant sludge	Liquid waste	Transported under CA05 Biosecure Transport and Treatment of Host Plant Material destined for recycling or waste (DPI 2017, ref INT17/91995) due to risk of potato cyst nematode to suitably licensed facility for heat treatment before reuse/disposal
Bulk Bags (woven polypropylene)	General solid waste (non-putrescible)	Off-site recycling at suitably licensed facility
Timber (pallets and other timber uses)	General solid waste (non-putrescible)	Off-site reuse or recycling at suitably licensed facility

TABLE 39: WASTE TYPES, CLASSIFICATIONS AND MANAGEMENT METHODS FOR OPERATIONAL WASTE		
Waste types	**NSW EPA Classification**	**Proposed management method**
Scrap metal (offcuts of plant, steel removed from plant or rebuild)	General solid waste (non-putrescible)	Off-site recycling at suitably licensed scrap metal recycling facility
Oily sludge	Liquid waste	Off-site recycling at a suitably licensed oil recycling facility, or further treatment and disposal
Oils (mineral and vegetable)	Liquid waste	Off-site recycling at a suitably licensed oil recycling facility, or further treatment and disposal
[1] The Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) require that when more than 10 smoke alarms (particularly americium-241 sources) are collected for bulk disposal they must be treated as radioactive waste and the requirements of the National Health and Medical Research Council's Code of practice for the near-surface disposal of radioactive waste in Australia (1992) must be met. *[2] https://www.fluorocycle.org.au/* *[3] https://www.lamprecyclers.com.au/*		

Estimated quantities of operational waste:

SLR has adopted data provided by SBA for both current and predicted operational waste arisings. This has been supplemented with additional data and assumptions, where appropriate, as shown below.

TABLE 40: ESTIMATED QUANTITIES OF OPERATIONAL GENERAL WASTE AND RECYCLING		
Waste types	**NSW EPA Classification**	**Estimated generation rate (tonnes per year)**
General waste from operations including FFDC dust, street sweepings, rejected product, empty containers	General solid waste (non-putrescible)	3,693
General recyclables from office	General solid waste (non-putrescible)	4
Cardboard / Fibreboard	General solid waste (non-putrescible)	1,128
Packed and unpacked product waste	General solid (putrescible) waste	7,283
Peel	General solid (putrescible) waste with biosecurity requirements	5,026
Waste water treatment plant sludge	Liquid waste or General solid (putrescible) waste with biosecurity requirements	7,694
Waste water treatment plant screenings	Liquid waste or General solid (putrescible) waste with biosecurity requirements	718
Empty intermediate bulk containers (IBC)	General solid waste (non-putrescible)	17
Stretch wrap (LDPE)	General solid waste (non-putrescible)	41
Bulk bags / containers	General solid waste (non-putrescible)	Minimal
Timber	General solid waste (non-putrescible)	Minimal
Scrap metal, wire, cabling	General solid waste (non-putrescible)	Minimal

TABLE 40: ESTIMATED QUANTITIES OF OPERATIONAL GENERAL WASTE AND RECYCLING		
Waste types	**NSW EPA Classification**	**Estimated generation rate (tonnes per year)**
Waste oil (fryer)	Liquid waste	110

In addition to the SBA estimates of waste generation, the Project also includes an office space, which will generate dry comingled recyclables. Adopting the rate of 10 L per 100 m^2 per day of recycling generation included in the Council's DCP Industrial and Mixed-Use Waste Management Guideline, it is estimated that the office (1,800 m^2) will generate approximately 180 L of recyclables per day.

SBA generates a significant proportion of cardboard waste through their operations. To minimise packaging waste generated in the recyclables stream, it is recommended that packing waste is returned to the suppliers where possible. Standard pallets are recommended to be returned to their owners and non-standard and broken pallets are to be stockpiled and collected as required by a private waste contractor.

As per Council's DCP, food scraps from any non-commercial kitchen, for example a staff canteen, should be placed in specialised bins and collected regularly. Processing food waste are sent off-site to an organic waste processing facility daily.

If additional collection services are required, such as secured document destruction, these can be organised with a private waste contractor who can provide additional bins and take collected waste to an off-site licenced facility.

The project is anticipated to produce minimal quantities of garden organics. Less than 100 L of garden organics are estimated to be generated per week. This waste will be taken by a landscaping contractor who will dispose of it at an off-site licenced facility.

Waste storage area size:

The operational project will generate a range of wastes that are required to be separated. The waste storage area must be large enough to adequately store all quantities of operational waste generated between collections. SBA has provided detail on the nature and type of current operational waste receptacles for reference. These have been compared to expected volumes of arising to determine the waste storage area size.

As outlined in the Penrith DCP, additional storage space for the bulky waste stream must be provided. This stream includes broken pallets, broken storage units, e-waste and other materials that cannot be disposed of in the general or recyclable waste stream, or other specific waste streams identified in the Waste Management Plan; this has been allowed for in the calculations.

Hazardous waste is unlikely to be generated by project operations. If hazardous waste is generated, SBA should follow Council's DCP and best practice waste management. This requires that hazardous waste at the site must be placed in specialised containment bins, clearly signposted and labelled, securely locked and may require a licence and consultation from the EPA and approval from Council. Hazardous waste removal is to be undertaken as needed by appropriately licensed specialised contractors.

A number of other wastes are identified in the Waste Management Plan outside of those described in more detail previous. These are typically lower quantity or incidental wastes, as a result of specific process or maintenance event. The waste storage area should be designed to allow for other waste storage containers, such as skip bins, to be present for these wastes as needed, and for stockpiling of waste streams such as pallets.

Following assessment of storage needs for each of the waste streams estimated to be generated by the project, the overall storage area to be allowed for in design should be at least 844 m^2.

TABLE 41: TOTAL RECOMMENDED STORAGE AREA FOR OPERATIONS			
Bin/skip/container	**Estimated footprint (m^2)**	**Waste collected**	**No. of collection per week**
RORO hook lift bin - 20 m^3	57	Wastewater treatment plant sludge	7
RORO hook lift bin - 15 m^3	47	Wastewater treatment plant screening	1
2 x RORO hook lift bin - 15 m^3	93	Peel waste	7
Hook lift compactor - 32 m^3	64	Unpacked/packed product waste	7
Hook lift compactor - 32m^3	64	General waste	4
Hook lift compactor - 30m^3	64	Carboard/fibreboard	2
Baler and bale storage	54	Stretch wrap (LDPE)	1 x monthly
Skip bin - 10 m^3	55	Scrap metal, wire, cabling	As required
Storage area (IBCs)	40	Waste oil	As required
RORO hook lift bin - 30 m^3	64	Bulky/other waste	1 x fortnight
RORO hook lift bin - 32 m^3	64	Rejected waste	1
Front Load Bin - 3m^3	18	General office recycling	1 x fortnight
RORO hook lift bin - 32 m^3	64	Processed cereal waste	7
General allowance for other waste storage	77	Spent solvents, cleaning spirits, bulk bags, other containers, timber, pallets and other waste	As required

It is the responsibility of the Building Manager, or equivalent role, to implement this WMP and a responsibility of all warehouse tenants and staff to follow the waste management procedures set out by the Waste Management Plan. SLR recommends that all subcontractors enlisted by SBA are to have roles and responsibilities identified and the project's waste management system clearly explained.

6.1.10 Soils and water

This section of the EIS evaluates the matters of soil and water associated with the proposed development, as per the SEARs, in particular:

- ***an assessment of potential surface and groundwater impacts associated with the development, including potential impacts on watercourses, riparian areas, groundwater, and groundwater-dependent communities nearby***
- ***a detailed site water balance including a description of the water demands and breakdown of water supplies, and any water licensing requirements***
- ***details of stormwater/wastewater management system including the capacity of onsite detention system(s), onsite sewage management and measures to treat, reuse or dispose of water***
- ***description of the measures to minimise water use***
- ***description of the proposed erosion and sediment controls during construction***
- ***characterisation of water quality at the point of discharge to surface and/or groundwater against the relevant water quality criteria (including details of the contaminants of concern that may leach from the waste into the wastewater and proposed mitigation measures to manage any impacts to receiving waters and monitoring activities and methodologies) and***
- ***characterisation of the nature and extent of any contamination on the site and surrounding area***

6.1.10.1 Potential surface and groundwater impacts

Clause 33L of the WSEA SEPP aims to avoid or minimise the adverse impacts of stormwater on the land on which development is to be carried out, adjoining properties, riparian land, native bushland, waterways, groundwater dependent ecosystems and groundwater systems, requiring the consent authority to take into consideration the following matters.

TABLE 42: STORMWATER, WATER QUALITY AND WATER SENSITIVE DESIGN	
Clause 33L consideration	**Response / Location of Assessment**
(a) water sensitive design principles are incorporated into the design of the development, and	In addition to existing measures (as part of SSD-7173) the proposed development aims to meet Council's water conservation requirements in the form of a 50kL underground tank, which is to be connected for toilet flushing and irrigation reuse.
(b) riparian, stormwater and flooding measures are integrated, and	The subject site is not affected by mainstream flooding, as determined in SSD-7173. There is a downstream detention basin provided for the entire subdivision which caters for the post-developed flows from each lot within the First Estate Precinct. This basin controls the stormwater discharge from the site, and therefore negates the need for an on-site detention storage. In addition to a downstream detention basin, there is downstream infrastructure which caters for the water quality treatment of the entire Estate in its post-developed state. To further supplement the downstream treatment, there are some water quality protection measures proposed on site, in order to protect downstream waterways from oil or chemical spills.
(c) the stormwater management system includes all reasonable management actions to avoid adverse impacts on the land to which the development is to be carried out, adjoining properties, riparian land, native bushland, waterways, groundwater dependent ecosystems and groundwater systems, and	In addition to the existing downstream treatment, there are some water quality protection measures proposed on site, in order to protect downstream waterways from oil or chemical spills. Based on the size and use of the proposed manufacturing facility, it has been recommended to provide a total storage volume of 612m^3 for the temporary containment of dangerous chemicals or oil, in case of a spill or accident. This volume is to be provided on the northern part of this site (which is to be dedicated for truck parking) in the form of above ground ponding. In addition to this storage, an isolation vale or penstock valve is proposed to be installed within the most downstream stormwater inspection pit. This enables the stormwater system to be shutdown remotely in the event of a spill, wherein the contaminated liquid will fill up into the stormwater pipe system and surcharge within the truck parking area.
(d) if a potential adverse environmental impact cannot be feasibly avoided, the development minimises and mitigates the adverse impacts of stormwater runoff on adjoining properties, riparian land, native bushland, waterways, groundwater dependent ecosystems and groundwater systems, and	The proposal demonstrates minimal impact on the existing environment.

TABLE 42: STORMWATER, WATER QUALITY AND WATER SENSITIVE DESIGN	
Clause 33L consideration	**Response / Location of Assessment**
(e) the development will have an adverse impact on— *(i) the water quality or quantity in a waterway, including the water entering the waterway, and* *(ii) the natural flow regime, including groundwater flows to a waterway, and* *(iii) the aquatic environment and riparian land (including aquatic and riparian species, communities, populations and habitats), and* *(iv) the stability of the bed, banks and shore of a waterway, and*	The proposed manufacturing facility aims to meet the detention and stormwater quality required through the existing downstream estate bio-retention and detention basins. Additionally, the development aims to meet Council's water conservation requirements in the form of a 50kL underground tank, which is to be connected for toilet flushing and irrigation reuse. The stormwater design of the proposed manufacturing facility is in accordance with Council's detention, water quality and flooding requirements as well as engineering best practice principles, hence it can be ensured that there will be minimal impact on the existing environment as a result of the proposed development.
(f) the development includes measures to retain, rehabilitate and restore riparian land.	The proposal demonstrates minimal impact on the existing environment.

Given the abovementioned compliance with Clause 33L of the WSEA SEPP, it is considered that the proposed development meets its overall objective to avoid or minimise the adverse impacts of stormwater on the land on which development is to be carried out, adjoining properties, riparian land, native bushland, waterways, groundwater dependent ecosystems and groundwater systems.

6.1.10.2 Details of stormwater/wastewater management system

There is a downstream detention basin provided for the entire subdivision which caters for the post-developed flows from each lot within the First Estate Precinct. This basin controls the stormwater discharge from the site, and therefore negates the need for an on-site detention storage.

In addition to a downstream detention basin, there is downstream infrastructure which caters for the water quality treatment of the entire First Estate subdivision in its post-developed state. Namely, the following downstream treatment is provided:

- Primary treatment in the form of gross pollutant traps
- Secondary Treatment in the form of bio-retention basins

It can be surmised that the downstream estate infrastructure in place, which caters for the proposed development, ensures that Council's water quality requirements are satisfied.

In addition to the downstream treatment, there are some water quality protection measures proposed on site, in order to protect downstream waterways from oil or chemical spills. Based on the size and use of the proposed manufacturing facility, it has been recommended to provide a total storage volume of 612m^3 for the temporary containment of dangerous chemicals or oil, in case of a spill or accident. This volume is to be provided on the northern part of this site (which is to be dedicated for truck parking) in the form of above ground ponding. In addition to this storage, an isolation vale or penstock valve is proposed to be installed within the most downstream stormwater inspection pit. This enables the stormwater system to be shutdown remotely in the event of a spill, wherein the contaminated liquid will fill up into the stormwater pipe system and surcharge within the truck parking area.

Reference should be made the Stormwater Report, prepared by Henry & Hymas Consulting Engineering, which forms **Appendix 14** of this EIS.

It is also noted that all the drains internal to the facility that are being utilised in the manufacturing process will be captured and treated by the wastewater treatment plant on site, this includes any lab sinks. All external drains that are design to capture spills with raw material unloading and wash down will also be captured and treated through the wastewater treatment plant. Currently Sydney Water are finalising the "consent to discharge" requirements but the wastewater treatment plant will be designed to achieve this ongoing requirement.

6.1.10.3 Measures to minimise water use

Water usage reduction within the manufacturing facility is proposed to be achieved through the use of 4-star WELS rated water fixtures (or higher), in addition to water reuse for toilet flushing and irrigation purposes. A 50kL rainwater tank is proposed to be provided for this purpose. This rainwater storage is to be provided in the form of an underground tank within the external car parking. A total roof catchment of 29,030m_2 is proposed to connect to the rainwater tank.

A MUSIC model has been developed in order to undertake a water balance on the proposed reuse system. The model has been prepared with the following parameters:

- Using Council's MUSIC link data.
- A total of 16 toilets have been included in the model, with an estimated demand of 0.1kL/day for each. Note no proposed disabled toilets have been included within the model.
- A total landscaping area of 450m^2 is proposed to be connected to the rainwater tank, with an estimated demand of 180kL/yr. Please note that it is expected that the turf areas and steep batter areas are not understood to be irrigated.
- Effective rainwater volume of 40kL.

Council's requirement is to provide 80% of non-potable demand through rainwater reuse. A re-use rate of 80.4% has been achieved.

6.1.10.4 Erosion and sediment controls

Refer to the sediment and erosion control plan, prepared by Henry & Hymas Consulting Engineers, which forms part of **Appendix 14** of this EIS.

6.1.10.5 Water quality

The existing First Estate Precinct contains downstream infrastructure which caters for the water quality treatment of the entire subdivision in its post-developed state. Namely, the following downstream treatment is provided:

- Primary treatment in the form of gross pollutant traps
- Secondary Treatment in the form of bio-retention basins

It can be surmised that the existing downstream Estate infrastructure, ensures that Council's water quality requirements are satisfied.

In addition to the downstream treatment, there are some water quality protection measures proposed on site, in order to protect downstream waterways from oil or chemical spills. Based on the size and use of the proposed manufacturing facility, it has been recommended to provide a total storage volume of 612m^3 for the temporary containment of dangerous chemicals or oil, in case of a spill or accident. This volume is to be provided on the northern part of this site (which is to be dedicated for truck parking) in the form of above ground ponding. In addition to this storage, an isolation vale or penstock valve is proposed to be installed within the most downstream stormwater inspection pit. This enables the stormwater system to be shutdown remotely in the event of a spill, wherein the contaminated liquid will fill up into the stormwater pipe system and surcharge within the truck parking area.

6.1.10.6 Contamination

An Environmental Site Assessment (20 April 2021) has been prepared by JBS&G (**Appendix 10**) to investigate and document the potential contamination of the subject site, assess the suitability of the site for the proposed use (or make recommendations to enable such a use to occur).

Based on the findings of their investigations, JBS&G have concluded the following:

- The site has historically been used for agricultural and rural residential purposes.
- The potential sources of contamination at the site included historic filling for site levelling purposes, use of the site for agricultural purposes and former structures potentially containing hazardous materials.
- Fill material was encountered at all sampling locations ranging in depth from 1.3-2.9 m bgs. The fill generally comprised gravelly silty clay of low plasticity with minimal anthropogenic inclusions. The fill material was underlain by natural brown and red silty clay of high plasticity to the maximum depth (11.5 m bgs) of the investigation.
- Representative samples of fill material and natural soils from the site were analysed for a range of identified potential contaminants of concern including heavy metals, PAHs, TRH, BTEX, OCP/PCBs and asbestos. The reported concentrations of all contaminants were below the adopted criteria applicable to commercial / industrial land-use.
- Based on the findings of this investigation and subject to the limitations presented in Section 10 of the Environmental Site Assessment, it is considered that the site is suitable for the proposed commercial land-use (HIL-D).

It is recommended during site redevelopment works a Construction Environmental Management Plan (CEMP) should be implemented which identifies typical site management controls and makes provisions for unexpected finds. This recommendation has been included within the management and mitigation measures outlined in **PART G** of this EIS.

6.1.11 Infrastructure requirements

This section of the EIS evaluates the infrastructure requirements of the proposed development, as per the SEARs, and addresses the following specific matters:

- ***a detailed written and/or graphical description of infrastructure required on the site, including any electrical substation/s and on-site switch yard/s***
- ***identification of any infrastructure upgrades required off-site to facilitate the development, and describe any arrangements to ensure that the upgrades will be implemented in a timely manner and maintained***
- ***an infrastructure delivery and staging plan, including a description of how infrastructure on and off-site will be co-ordinated and funded to ensure it is in place prior to the commencement of construction***
- ***an assessment of the impacts of the development on existing utility infrastructure and service provider assets surrounding the site, including the adjacent Warragamba Pipelines' corridor, and a description of how any potential impacts would be avoided and minimised.***

An Infrastructure Report has been prepared by Henry & Hymas Consulting Engineers and contained within **Appendix 15** of this EIS, with information regarding the electrical and hydraulic service connections provided by Edgewater Connections and Sparks and Partners Consulting Engineers respectively.

The following utility connections available/required for the proposed development.

6.1.11.1 Electrical Services – High Voltage (HV)

The high voltage connection point for the SBA development will be from the two switching stations locating within the site adjacent to the western boundary off Distribution Drive. These two switching stations represent the delineation of the private internal HV infrastructure to the Endeavour Energy assets.

Adjacent to the two Endeavour Energy owned switching station will be another switching station, which will be privately owned and maintained. This is the connection point for the high voltage ring main, which links up to the internal substations and main switchboard within the development.

There are significant upgrades required to the Endeavour Energy infrastructure in order to ensure the required power can be provided to the development site. Power will be supplied from Mamre Zone Substation (located off John Morphett Drive, Erskine Park) to the two (2) Endeavour Energy switching stations previously discussed.

To facilitate the works mentioned above, two (2) x 11kV feeders from the Zone Substation will be required to be installed along Lenore Drive, Erskine Park Road, Mamre Road and Distribution Drive. This route is approximately 3,240m long and requires the following:

- Approx. 1,000m of the route has spare conduits which can be used;
- Approx. 2,300m of Trenching/conduit installation is required;
- Approx. 9,080m of 300mm2 CU 3C Cable;
- Approx. 2,310m of 240mm2 CU 3C Cable;
- Two (2) new Switching Stations.

A private 11kV switching station will be provided beside the Endeavour 11kV switching station on the Distribution Drive boundary. The incoming power supply has been negotiated with Endeavour Energy. An internal 11kV ring main will be established from this switching station that will connect 7-off 1500kVA transformers in the first instance, with a space for one additional 1500kVA transformer. 5-off transformers will be located (under cover) on the roof of the building to serve the equipment within the building, one transformer will be located adjacent to the wastewater treatment plant to supply it and another will be located on the property boundary to serve the corn processing area. Each transformer will be provided with a Ring Main Unit to enable it to be turned off without affecting other transformers.

Each transformer will supply a dedicated main switchboard with associated automatic power factor correction equipment. Power factor will be retained above 0.9. Each main switchboard will supply general light and power as well as the processing plant equipment.

Lighting will be provided internally to comply with the relevant section of AS1680 and externally to comply with the relevant section of AS1158. External lighting will comply with AS4282 to ensure that there are no, or at least acceptable, obtrusive effects.

6.1.11.2 Telecommunications

There are two (2) 100mm diameter and one (1) 50mm diameter telecommunications lead-in conduits proposed as a part of the development works. These conduits are proposed to be marked and capped at the Mamre Road property boundary, for future connection and extension by Telco. All infrastructure works within the road reserve are to be finalised by Telco.

6.1.11.3 Sewer Drainage

Sydney Water has provided a plan depicting all water services surrounding the subject site. There is a 125mm Polyethylene sewer service within Mamre Road, as well as a pressure main with a boundary kit dedicated for the development stubbing in from Distribution Drive. The existing pressure sewerage system for the site was designed for approximately 800 EPs. The sewer demand for the site is estimated to be an average flow of 13.9 L/s (based off 80% of the water demand), which equates to approximately 10,000 EPs. Sydney Water has advised that the existing pressure sewerage system does not have sufficient capacity, and is therefore not an appropriate sewer connection point for the site. Similarly, the 125mm PE pipe within Mamre Road is not an appropriate sewerage connection.

As agreed in principle with Sydney Water, a new sewer gravity pipe will be required to connect to the existing Sydney Water DN600mm sewer main within Mamre Road. This proposed pipe will be approximately 950m in length.

6.1.11.4 Potable Water

There is a 200mm DICL service within Distribution Drive, as well as a 200mm DICL service on the far side of Mamre Road. The connection point for the potable and water services will be to the 200mm DICL service in Distribution Drive.

Sydney Water advises that the potable connection for the development will be into a future DN300 potable water main in Mamre Road (proposed to be designed and constructed by others). However, the hydraulic consultant from Sparks and Partners has advised that the proposed connection point for the site is instead the 200mm DICL service within Distribution Drive, as stated above.

There are no recycled water services available at or near the development site, therefore no recycled water connection will be proposed for the development.

6.1.11.5 Natural Gas

There is a 110 NY 210 kPa medium pressure gas main along Mamre Road along the front of the property and a polyethylene 50 NY 210 kPa medium pressure gas main and 110 polyethylene 210 kPa medium pressure gas main on James Erskine Drive across from the development site.

As per discussions with Jemena, the proposed gas services for the development will not connect into any of the existing infrastructure, but will instead connect into a proposed 1000kPa dedicated gas main which is to be installed by Jemena.

6.1.11.6 Fire Hydrant System

The building is required to be covered by a fire hydrant system throughout in accordance with NCC / BCA Volume 1 Section E1.3 and complying with AS 2419.1 – 2005. An existing hydrant system and hose reel system that was installed as a part of the previous stage has a direct feed water supply system from town main connection with a 150mm hydrant ring main around the building. This is to be extended around the proposed manufacturing development and has sufficient capacity to supply the fire hydrant system for the entire site.

6.1.11.7 Fire Sprinkler System

Sprinkler protection for all areas of the existing warehouse is to be designed in accordance with FM Global Data Sheets and/or hydraulically proven to satisfy FM Global guidelines. The sprinkler design for areas of the existing building that are relevant to the new manufacturing extension are as follows.

- Low bay warehouse – 12 x K22 (K320 metric) @ 350 kPa
- Low bay awning – 12 mm/min over 230 m2 (HC-3)
- Dock offices – 4 mm/min over 140 m2 (HC-1)

The proposed fire sprinkler systems shall be supplied by the existing fire pumps and tanks available at site, refer to below:

- Existing tanks capacity – 540kL
- Existing pumps– two diesel duty and standby Pumps, one (1) pump is to FM Global and one pump appears to have been installed to AS 2941

The fire sprinkler system will be provided with five sprinkler control valve sets on the valve room located at the façade of the proposed new building.

A proposed water mist system shall have a separate pump to boost the ring main water supply.

6.1.11.8 Stormwater

There is an existing ø900mm stormwater stub at the north-west corner of the site with an approximate invert level of IL32.40m. The stub connects into the existing stormwater within Distribution Drive. A proposed pit will be constructed over the existing stub at this location with a reduced level of RL 35.30m. There will be no need for on-site detention or on-site water quality treatment as there is a downstream detention structure and bio-retention basin that will address these issues respectively. The existing 900mm stormwater pipe has sufficient capacity to convey the post-developed flows from the development site.

There will be a 50kL underground rainwater tank in the eastern carpark for the purpose of maximising re-use and minimising potable use of rainwater. 2930m^2 of the roof area will be directed towards the 50kL rainwater tank.

6.1.12 Fire and incident management

This section of the EIS evaluates the matters of fire incident management of the proposed development, as per the SEARs, in particular:

- ***identification of the aggregate quantities of combustible waste products to be stockpiled at any one time***
- ***technical information on the environmental protection equipment to be installed on the premises such as air, water and noise controls, spill clean-up equipment and fire (including location of fire hydrants and water flow rates at the hydrant) management and containment measures***
- ***details regarding the fire hydrant system and its minimum water supply capabilities appropriate to the site's largest stockpile fire load***
- ***detailed information relating to the proposed structures addressing relevant levels of compliance with Volume One of the National Construction Code (NCC).***

A Fire Safety Strategy Report has been prepared by Omnii Consulting Fire Engineers, to identify the likely fire engineering outcomes (or proposed Performance Solution) required to address the expected departures from the Deemed To Satisfy (DTS) provisions of the NCC.

The content of this document is preliminary and is subject to acceptance of the Fire Engineering Brief (FEB) and the Fire Engineering Report (FER) by the Authority Having Jurisdiction (AJH) and other relevant Regulatory Authorities.

The full Fire Safety Strategy Report is included within **Appendix 20** of this EIS, and summarized in the following subsections.

6.1.12.1 Aggregate quantities of combustible waste products

Refer to **Section 6.1.9** of this EIS for details of combustible waste product quantities.

6.1.12.2 Hazard identification

A PHA has been prepared by Riskcon Engineering, to identify potential hazards that may be present at the site as a result of operations or storage of materials. The complete PHA is included within **Appendix 18** of this EIS and summarized in the following subsections.

Based on the identified hazards, scenarios were postulated that may result in an incident with a potential for offsite impacts. Postulated scenarios were discussed qualitatively and any scenarios that would not impact offsite were eliminated from further assessment. Scenarios not eliminated were then carried forward for consequence analysis.

Incidents carried forward for consequence analysis were assessed in detail to estimate the impact distances. Impact distances were developed into scenario contours and overlaid onto the site layout diagram to determine if an offsite impact would occur. The consequence analysis showed that a full warehouse fire had the potential to impact offsite both through radiant heat and toxic smoke emission. Hence, these scenarios were carried forward for frequency analysis and risk assessment.

The frequency analysis and risk assessment showed that the incidents carried forward would have a fatality risk of 7.06 chances per million per year (pmpy) at the site boundary, with lesser risk at further distances from the boundary. HIPAP No. 4 (Ref. [3]) publishes acceptable risk criteria at the site boundary of 50 pmpy (for industrial sites). Therefore, the probability of a fatality at the site boundary is within the acceptable risk criteria.

In addition, incidents exceeding 23 kW/m^2 heat radiation or 7 kPa explosion overpressure were reviewed which indicated that the contours from such incidents would not impact any structures and thus propagation incidents would be not expected to occur.

Based on the analysis conducted, it is concluded that the risks at the site boundary are not considered to exceed the acceptable risk criteria; hence, the facility would only be classified as potentially hazardous and would be permitted within the current land zoning for the site.

Notwithstanding the conclusions following the analysis of the facility, the following recommendations have been made:

- The warehouse and/or site boundaries shall be capable of containing 612 m^3 which may be contained within the warehouse footprint, site stormwater pipework and any recessed docks or other containment areas that may be present as part of the site design.
- The civil engineers designing the site containment shall demonstrate that the design is capable of containing at least 612 m^3.
- A stormwater isolation point (i.e. penstock isolation valve) shall be incorporated into the design. The penstock shall automatically isolate the storm water system upon the detection of a fire (smoke or sprinkler activation) to prevent potentially contaminated liquids from entering the water course.
- A reassessment of the site facility risk contours shall be conducted in the form of a FHA once the final design has been completed prior to construction of the DG related elements of the design.

6.1.12.3 Design levels of compliance

The SBA project consists of modifications to the existing distribution centre warehouse (Stage 1) and the construction of a new extension industrial building adjoining the warehouse. The existing warehouse shall be referred to as the 'existing facility', and the new extension industrial building shall be referred to as the 'new extension' herein.

The existing facility and new extension shall form a single united building which extends over two separate allotments for ownership purposes. An agreement between the building owners shall be included in the FER, which details:

- The united building is permitted to be located over the two site allotments.
- The entity who will take responsibility of the maintenance and testing of the shared fire safety systems listed on the AFSS.
- If the site allotment ownership changes, then the fire engineering strategy must be re-assessed.
- Should the building, building use or fitout be changed, then the fire engineering strategy must be re-assessed.

The united building is a Class 5-9 Large Isolated Building (LIB) with an area in excess of 18,000 m^2 and a volume in excess of 108,000 m^3. As such, the building would be provided with:

- Perimeter Vehicular Access (PVA) in accordance with NCC Clause C2.3
- Sprinkler system
- Smoke exhaust
  Note: An existing Performance Solution removes smoke exhaust from the existing facility
- Fire detection and alarm system
- Hydrant system including ring main around the building
- System monitoring
- Fire control centre
- Emergency lighting and exit signage
- Fire hose reels
- Portable fire extinguishers

Reference should be made to the complete Fire Safety Strategy Report contained within **Appendix 20** of this EIS.

6.1.13 Hazards and risk

This section of the EIS evaluates the matters of hazard and risk associated with the proposed development, as per the SEARs, including:

- ***a preliminary risk screening completed in accordance with State Environmental Planning Policy No. 33 – Hazardous and Offensive Development and Applying SEPP 33 (DoP, 2011), with a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the development. Should preliminary screening indicate that the project is "potentially hazardous" a Preliminary Hazard Analysis (PHA) must be prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis (DoP, 2011) and Multi-Level Risk Assessment (DoP, 2011).***

The proposed development requires the storage of a number DGs to facilitate the SBA operations. This involves the storage and handling of Class 2.1 Flammable Gases, Class 2.2 Non-flammable Non-toxic Gases, Class 8 Corrosive Substances and Combustible Liquids. A review of the quantity of goods to be stored indicates the site would exceed the limits listed in SEPP 33, which requires the risks associated with a facility storing DGs to be assessed in the form of a PHA to determine whether there is the potential for offsite impacts.

Riskcon has been commissioned to prepare a PHA for the facility, as contained within **Appendix 18** of this EIS.

A hazard identification table was developed for the warehouse facility to identify potential hazards that may be present at the site as a result of operations or storage of materials. Based on the identified hazards, scenarios were postulated that may result in an incident with a potential for offsite impacts. Postulated scenarios were discussed qualitatively and any scenarios that would not impact offsite were eliminated from further assessment. Scenarios not eliminated were then carried forward for consequence analysis.

Incidents carried forward for consequence analysis were assessed in detail to estimate the impact distances. Impact distances were developed into scenario contours and overlaid onto the site layout diagram to determine if an offsite impact would occur. The consequence analysis showed that a full warehouse fire had the potential to impact offsite both through radiant heat and toxic smoke emission. Hence, these scenarios were carried forward for frequency analysis and risk assessment.

The frequency analysis and risk assessment showed that the incidents carried forward would have a fatality risk of 7.06 chances per million per year (pmpy) at the site boundary, with lesser risk at further distances from the boundary. HIPAP No. 4 (Ref. [3]) publishes acceptable risk criteria at the site boundary of 50 pmpy (for industrial sites). Therefore, the probability of a fatality at the site boundary is within the acceptable risk criteria.

In addition, incidents exceeding 23 kW/m^2 heat radiation or 7 kPa explosion overpressure were reviewed which indicated that the contours from such incidents would not impact any structures and thus propagation incidents would be not expected to occur.

Based on the analysis conducted, it is concluded that the risks at the site boundary are not considered to exceed the acceptable risk criteria; hence, the facility would only be classified as potentially hazardous and would be permitted within the current land zoning for the site.

Notwithstanding the above, the following recommendations have been made:

- The warehouse and/or site boundaries shall be capable of containing 612 m^3 which may be contained within the warehouse footprint, site stormwater pipework and any recessed docks or other containment areas that may be present as part of the site design.
- The civil engineers designing the site containment shall demonstrate that the design is capable of containing at least 612 m^3.
- A stormwater isolation point (i.e. penstock isolation valve) shall be incorporated into the design. The penstock shall automatically isolate the storm water system upon the detection of a fire (smoke or sprinkler activation) to prevent potentially contaminated liquids from entering the water course.
- A reassessment of the site facility risk contours shall be conducted in the form of a FHA once the final design has been completed prior to construction of the DG related elements of the design.

6.1.14 Bushfire and incident management

This section of the EIS evaluates matters of bushfire and incident management associated with the proposed development, as per the SEARs, and addresses the following specific matters:

- ***assess the level of hazard posed to future development on adjacent land and how the hazards may change as a result of development***
- ***address the requirements of Planning for Bush Fire Protection 2019 (RFS), in particular the provision of access (including perimeter roads) and water supply for firefighting purposes***

A Bushfire Protection Assessment has been undertaken by Travers Bushfire & Ecology, in accordance with the NCC and *Planning for Bush Fire Protection 2019* (PBP), and forms part of **Appendix 13** of this EIS.

The proposed development is considered a 'Class 7' structure in accordance with the NCC. It is categorised by the NSW Rural Fire Service (NSW RFS) planning policy document PBP as 'other non-residential development', and more specifically 'commercial and industrial development'.

For this type of development, the NSW RFS requires that development applications should satisfy the aims and objectives of PBP, propose an appropriate combination of bushfire protection measures and provide evidence that the intent of each measure can be satisfied.

The Bushfire Protection Assessment has found that bushfire can potentially affect the proposed development from unmanaged grassland to the east of the site. However given the narrow width of the grassland (20m) and the adequate APZ setback provided, the bushfire risk is considered low. In addition, the new industrial manufacturing facility (within Lot 10) will provide compliance with the PBP 2019 requirements for water supply, access, landscaping and evacuation.

6.1.15 Ecologically sustainable development

This section of the EIS evaluates the ESD aspects of the proposed development, in relation to the SEARs and addresses the following specific matters:

- ***a description of how the proposal will incorporate the principles of ecologically sustainable development in the design, construction and ongoing operation of the development***
- ***consideration of the use of green walls, green roofs and/or cool roofs in the design of the development***
- ***a description of the measures to be implemented to minimise consumption of resources, especially energy and water.***

Stantec have prepared an ESD Report to provide an overview of the ESD initiatives adopted for the proposed development – refer to **Appendix 24** of this EIS. The report is intended to provide an overview of the potential key energy uses on site, and review methods to reduce the overall energy consumption. This is a design response to the SEARs for the project. The report further addresses ecologically sustainable aspects included in the development.

The proposed development has chosen to implement a number of sustainable design principles and includes initiatives design to mitigate the environmental impact of the following:

- Energy – including improved energy efficiency across the buildings and its associated sources.
- Passive Design Principles – reducing the projects overall requirement for building services.
- Water Efficiency – including reduced potable water demand.
- Waste Management – including the incorporation of a waste treatment plant.
- Ecology – Maintaining ecology through landscaping where practical.

6.1.15.1 Greenhouse gas emissions and energy efficiency

Combining the following strategies reduces the energy consumption of the proposed building from the base case by 10.3%:

1. High performance glazing in office and lobby area
2. Light roof colour with lower solar absorptance
3. Wider temperature control band in Office area
4. Increased lighting efficiency

The proposed food manufacturing facility represents 90% of the building area, most of which is unconditioned. Given the 24/7 operation of the facility, the lighting and equipment loads are considerable. The use of highly efficient lighting fixtures shows a significant improvement in the energy use of the building.

In the office area however, the cooling loads are responsible for most of the energy use. Therefore, the incorporation of solar control double glazing and a light-coloured roofing are key to reduce internal heat gains and bring the cooling loads down and improve the occupant's thermal comfort.

There are a number of improvements that can be incorporated to the building (at the detailed design phase) to further reduce loads including the following:

- Incorporation of motion and occupancy sensors for lighting in office and food manufacturing facility,
- Inclusion of Solar PV on the roof area,
- Use of energy efficient equipment, and
- Incorporating solar control devices (i.e. blinds) to the office North and East façade to reduce discomfort glare and excessive heat gains at peak hours.

6.1.15.2 ESD opportunities and initiatives

Environmental and building management:

Via the implementation of industry recognized best practice frameworks, the project design and built form will seek to respond to the ongoing environmental challenges of urban development and ensure the project implements a range of ESD initiatives aimed at improving ongoing building management.

The project will seek to address environmental management & building operational performance through consideration of the following initiatives.

- Building Commissioning & Tuning Procedures – (prior to practical completion / 12 months post practical completion). By implementing this via project contract documents the project ensures operational efficiency and building operation is optimised in accordance with the intended building design.
- Energy Metering – Energy meters will be installed separately for office, warehouse, and manufacturing areas (not shared). Sub-metering will provide real-time data for the use & management of building staff. Ensures operational efficiency is maintained in each are independently.
- Lighting sensors – The incorporation of lighting controls such as occupancy sensors and timers will ensure an efficient use of lighting energy.
- Emissions controls – Oil, odours, and particulates from the fryer exhausts are removed through efficient heat exchangers (HX). A thermal oil system is set in place to use heat efficiently throughout the food manufacturing process. In addition, HX have been insulated to avoid undesired heat transfers into the space, improving thermal and acoustic comfort.

Indoor environmental quality:

Improved indoor environment quality is a significant by-product of sustainable building design. The architectural design by HL Architects will give significant consideration to the incorporation elements within the project intent to improve indoor environment quality.

The following design features are considered with the intent to improve indoor environmental quality:

- Office floor plate design and layout has focused on maximizing daylight access. By maximizing daylighting opportunities, the building will inherently lower energy demand and GHG emissions via reduced lighting demand and improved passive thermal performance. This also increases occupant connection to the space. This is achieved by significant glazed areas, meeting rooms/cores being located away from the façade and the choice of glazing.
- Great proportion of high-quality views. The shape of the office is such that there are uninterrupted views from the majority of the open floor plates. This is also achieved by the extent of the glazed component of the building.
- Glare and radiant temperature control through the use of operable blinds on each window.
- Artificial Lighting Design – will be zoned & designed appropriately to ensure the optimum lighting comfort is achieved. This includes general illuminance and glare reduction in accordance with best practice standards, optimised surface illuminance for building users and localised occupant lighting controls.
- Acoustic comfort – consideration of internal noise levels, reverberation levels and appropriate acoustic separation levels in accordance with best practice standards. Examples include optimised internal materials and finishes to reduce reverberation improved building facades in order to ensure appropriate acoustic separation is achieved.
- Material Selections – will focus on reducing VOC levels and minimise formaldehyde impacts. Paints, sealants, adhesives, carpets, floor and material finishes will endeavour to comply with best practice VOC criteria via the architectural specification and design intent.

Potable water reduction:

Reduced potable water demand is a key ESD initiative identified within industry best practice standards. The development will reduce potable water demand via consideration of the following initiatives:

- Wastewater treatment – an on-site wastewater treatment plant will collect and treat wastewater from the food manufacturing process. This will allow significant re-use of water to minimize potable water consumption for the development. The design of this facility will be developed during further stages of the project.
- Utility meters to be designed to meet metering guidelines under the weights and measurement legislation, as outlined under the current National Measurement Regulations.
- An automatic monitoring system which records both consumption and demand, capable of producing quarter hour, hourly, daily, monthly, and annual use for all meters.
- Sanitary Fixtures – All sanitary fixtures are to be provided to the WELS ratings identified below:
  - Taps – 6 Star WELS
  - Urinals – 6 Star WELS
  - Toilet – 4 Star WELS
  - Showers – 3 Star WELS (>6 but <=7.5)
  - Dishwashers (where included) – minimum 3.5 Star WELS

Heat island effect:

In response to the growing heat island effect problem in Western Sydney, the proposed development will seek to incorporate a cool roof to help reduce heat build-up in the precinct. Cool roofs contribute to cooler and healthier environments, better air quality, climate change mitigation and lower energy consumption.

By installing a light-coloured roof with reduced solar absorptance the building will reduce energy loads by 0.1%. In addition, it will help mitigate heat island effect within the Mamre West Precinct.

The proposed development will incorporate a number of ecologically sustainable initiatives to complement the initiatives undertaken to reduce the Greenhouse Gas emissions of the site in line with the SEARs.

6.1.16 Biodiversity

This section of the EIS evaluates biodiversity impacts of the proposed development, as per the SEARs, and addresses the following specific matters:

- ***an assessment of the proposal's biodiversity impacts in accordance with the Biodiversity Conservation Act 2016, including the preparation of a Biodiversity Development Assessment Report (BDAR) where required under the Act, except where a waiver for preparation of a BDAR has been granted.***

A Biodiversity Assessment Report has been prepared by Travers Bushfire & Ecology for the purpose of seeking a BDAR wavier under section 7.9 of the BC Act – refer to **Appendix 12** of this EIS.

6.1.17 Planning agreement/development contributions

This section of the EIS evaluates the relevant planning agreement/development contributions associated with the proposed development, as required by the SEARs and addresses the following specific matters:

- ***demonstration that satisfactory arrangements have been or would be made to provide, or contribute to the provision of, necessary local and regional infrastructure required to support the development.***

The DPIE have confirmed that the subject site covered under the existing Voluntary Planning Agreement (VPA), executed under SSD-7173. The DPIE holds security in the form of bank guarantees and the VPA is registered on Titles identified within Schedule 3 of the VPA.

Therefore, satisfactory arrangements have been made towards securing regional infrastructure.

In addition, Council's Section 7.12 Citywide Contribution Plan is currently applicable to all non-residential development within the Penrith LGA, that have a proposed cost of works of $100,001 and greater. Such contributions will be applicable to the proposed development.

PART G PLANNED MANAGEMENT AND MITIGATION MEASURES FOR THE PROPOSED DEVELOPMENT

By:	Snack Brands Australia
In relation to:	State Significant Development Application (SSD-18204994) For proposed Industrial food manufacturing facility
Site:	2 and 14 Distribution Drive, Orchard Hills Lot 10 and 11 DP 271141

Snack Brands Australia (SBA), plan to undertake the construction and operation of the proposed Industrial food manufacturing facility, in accordance with the following subsections.

Below prescribes some of the terms and abbreviations used in this statement, including:

Approval	The Minister's approval of the project
BCA	Building Code of Australia
Council	Penrith City Council
DPIE	Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
EP&A Act	*Environmental Planning and Assessment Act 1979*
SBA	Snack Brands Australia
NCC	National Construction Code
Project	The proposed development as described in **PART C** of the EIS
Secretary	Secretary-General of the Department (or delegate)
Subject site	Land to which the project application applies
WorkCover	NSW WorkCover

7.1 ADMINISTRATIVE COMMITMENTS

7.1.1 Commitment to Minimise Harm to the Environment

1. SBA will commit to implement all reasonable and feasible measures, to prevent and/or minimise any harm to the environment, that may result from the construction or operation of the proposed development.

7.1.2 Terms of Approval

2. SBA would carry out the project generally in accordance with the:

   (a) Environmental Impact Statement;
   (b) Drawings;
   (c) Management and Mitigation Measures;
   (d) Any Conditions of Approval.

7.1.3 Occupation Certificate

3. SBA would ensure that Occupation Certificates are obtained prior to the occupation of the facilities.

4. If there is any inconsistency between the above, the Conditions of Approval shall prevail to the extent of the inconsistency.

5. SBA would ensure compliance with any reasonable requirement(s) of the Secretary of the DPIE arising from the assessment of:

(a) Any reports, plans, programs, strategies or correspondence that are submitted in relation to this Approval; and
(b) The implementation of any recommended actions or measures contained in reports, plans, programs, strategies or correspondence submitted by the Project Team as part of the application for Approval.

7.1.4 Structural Adequacy

6. SBA would ensure that all new buildings and structures on the site are constructed in accordance with the relevant requirements of the NCC.

7.1.5 Operation of Plant and Equipment

7. SBA would ensure that all plant and equipment used on-site, is maintained and operated in proper and efficient manner, and in accordance with relevant Australian Standards.

7.1.6 Construction Environmental Management Plan

8. Prior to the commencement of construction, SBA would prepare a Construction Environmental Management Plan (CEMP) that addresses the following:

(a) Air Quality;
(b) Noise;
(c) Waste Classification;
(d) Erosion and Sediment Control;
(e) Materials Management Plan; and
(f) Community Consultation and Complaints Handling.

7.1.7 Monitoring of State of Roadways

9. SBA would monitor the state of roadways leading to and from the subject site, during construction, and will take all necessary steps to clean up any adversely impacted road pavements as directed.

7.1.8 Waste Receipts

10. SBA would ensure that a permanent record of receipts, for the removal of both liquid and solid waste from the subject site, be kept and maintained up to date at all times. Such records would be made available to authorised person upon request.

7.1.9 Complaints Handling

11. SBA would prepare an Operational Complaints Handling Protocol for the development, prior to the commencement of operations.

7.1.10 Consultation

12. SBA would prepare a Community Consultation Strategy (CCS), to be implemented throughout the construction and operational phases of the project.

7.2 SPECIFIC ENVIRONMENTAL COMMITMENTS

7.2.1 Air

13. Prior to commencement of works, SBA would develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the relevant regulatory bodies.

14. Prior to commencement of works, a construction air quality management plan will be developed (post approval) in line with the Air Quality and Odour Risk Assessment.

15. SBA would develop an Operational Environmental Management Plan (OEMP) to address air emissions (including odour).

7.2.2 Noise

16. During the construction phase, SBA would ensure that all recommendations of the Construction Noise and Vibration Management Plan are adopted and implemented.

7.2.3 Traffic and Transport

13. SBA would ensure that a Construction Traffic Management Plan (CTMP) is prepared and submitted to DPIE. This plan would:

    (a) be submitted to the Secretary for approval prior to the commencement of construction;
    (b) describe the traffic volumes and movements to occur during construction;
    (c) detail proposed measures to minimise the impact of construction traffic on the surrounding network, including driver behaviour and vehicle maintenance; and,
    (d) detail the procedures to be implemented in the event of a complaint from the public regarding construction traffic.

14. The CTMP would be implemented throughout the construction cycle.

15. SBA would prepare a Workplace Travel Plan.

7.2.4 Aboriginal Cultural Heritage

16. All contractors undertaking earthworks on site would be briefed on the protection of Aboriginal heritage objects under the *National Parks and Wildlife Act 1974* and the penalties for damage to these items.

17. If unforeseen Aboriginal objects are uncovered during construction the unexpected finds protocol will be followed. Work will cease in the area, and the NSW Office of Environment and Heritage will be informed.

7.2.5 Waste Management

16. During construction, SBA would implement the measures contained within the prepared Waste Management Plan (**Appendix 25** of the EIS). These are to be incorporated into the CEMP to be issued prior to commencement of construction.

17. SBA would ensure that all waste generated on-site during construction and operation is classified in accordance with the *Waste Classification Guidelines: Part 1 Classifying Waste* and disposed of at facility that may lawfully accept the waste.

7.2.6 Dangerous Goods

18. SBA would reassess the site facility risk contours, in the form of a Final Hazard Analysis once the final design has been completed prior to construction of the DG related elements of the design.

19. SBA would ensure the following documentation is prepared in accordance with the WHS Regulation 2017:

    - A DGs Register, indicating the type of chemical, any notations that may be required from the risk assessment and the Safety Data Sheet for the chemical.
    - A Placard Schedule.
    - A Manifest.
    - A DG Risk Assessment of the storage and handling areas.
    - An Emergency Response Plan (ERP) and Emergency Services Information Package (ESIP).
    - A Hazardous Area Classification (HAC) and Hazardous Area Verification Dossier (HAVD).

PART H PROPOSED DEVELOPMENT JUSTIFICATION

8.1 JUSTIFICATION

The proposed development is justified on environmental, social and economic grounds and is compatible with the locality in which it is proposed. The proposed development would enhance the subject site from an otherwise vacant landholding to a productive employment generating facility.

This EIS is submitted on the following basis.

8.1.1 Supports State, Regional and Local Planning Objectives

The proposed development is consistent with the objectives, provisions and vision contained within *A Metropolis of Three Cities – Greater Sydney Region Plan*; the *Western City District Plan*; and ALEP2010. The proposal would contribute to employment generation in an area already earmarked for employment through both State and Regional planning policies.

8.1.2 Demonstrates an Appropriate Use of a Permissible Development

The proposed development would retain and contribute to the growth of new industry for the immediate locale and the wider region. The proposed development would be a highly appropriate and compatible (given its contiguousness to other existing industrial and logistics hubs, particularly the existing SBA warehouse) response to the strategic goals and objectives of the whole region as set out in *A Metropolis of Three Cities – Greater Sydney Region Plan* and the *Western City District Plan*. These documents all envisage employment-generating land uses at this location.

8.1.3 Minimises Environmental Impacts

Specialist consultants (as identified in **TABLE 1**) have assessed the potential impacts of the proposed development, determining that it could be undertaken with minimal environmental impacts. The commissioned reports (as listed in **TABLE 10**) have collectively concluded that no significant risk to the locality would result from the proposed development. Where impacts have been identified, these fully-developed strategies are set out in detail for mitigation. These measures are described in **PART F** of this EIS.

8.1.4 Creates Compatibility with Surrounding Development

The proposed development is compatible with existing land uses on adjacent lands, all of which provide very similar employment-generating functions. All are within the immediate vicinity of the proposed development. Detailed investigations undertaken, as part of this application, conclude that no significant environmental cumulative impacts, would occur from the proposed facility.

8.1.5 Delivers Ecologically Sustainable Development

The principles of ESD as outlined in Clause 7(4) of the EP&A Regulation have been carefully considered in the formulation of this proposal and are addressed as follows:

8.1.5.1 Precautionary Principle

After careful assessment by both the project team and expert consultants, it is concluded that no unmanageable threat or irreversible damage to the environment, would result from the proposed development.

8.1.5.2 Inter-generational Equity

The project team and expert consultants have examined the overall effects of the proposed development, on both the natural environment and the existing built environment within the vicinity of the subject site.

This detailed assessment has concluded that no unreasonable use of resources, affectation of environmental processes or prevention of the use of land for future generations would occur from the proposed development. The proposed development would improve the status of the subject site and contribute to the economies of the region through both substantial investment and new employment, thereby improving the inter-generational equity.

8.1.5.3 Improved Valuation, Pricing and Incentive Mechanisms

The proposed development would enable new cost efficiencies, through the consolidation of existing SBA manufacturing facilities of Smithfield and Blacktown. Such consolidation would improve logistics efficiencies, by removing the requirement for transfers between the existing facilities to the recently constructed SBA warehouse at 2 Distribution Drive, Orchard Hills.

The proposal also offers a total investment (including infrastructure and land) value of $222,532,480.00 (excluding GST).

8.1.5.4 Environmental Management

The proposed development implements significant and elaborate measures that avoid, contain and address any possible air-quality, noise, waste and pollution impacts, through avoidance, better design and management. This is exemplified through the following measures, which would be implemented throughout both the construction and operational phases of the proposed development:

- acoustic reduction
- air emissions management and mitigation
- waste management control practices
- erosion-and-sediment control

PART I CONCLUSION

This proposed development is deemed to SSD pursuant to Schedule 1, Part 12 of SRD SEPP. This EIS has been prepared in accordance with the SEARs.

The proposed development is considered to be entirely consistent with the Objects of the EP&A Act under Section 1.3, particularly the notion of promoting the orderly and economic development of the land. The proposed development is considered a quality outcome for an otherwise vacant industrial site, which forms part of the Western City District. Additionally, in the promotion of employment-generating opportunities throughout the construction and operational phases, the proposed development further delivers on the rationale of full economic utilisation and proper and orderly development of the land for its intended purpose namely industrial and employment uses.

Based on the specialist studies and extensive investigations carried out for the proposed development, the following conclusions are made:

1. **Strategic and Statutory Context** – The proposal aligns with the strategic planning framework, namely *A Metropolis of Three Cities* and the *Western City District Plan*. Consistency is achieved through the provision of employment, activation of stagnant industrial land and implementation of sustainable development measures that contribute to create a new and leading-edge form of development.

   In terms of the statutory context, the proposal is entirely consistent with the Objects of the EP&A Act. The appropriateness of the proposed development is also demonstrated through compliance with the ALEP2010 in that it achieves the employment generating outcomes envisaged for the subject site with minimal impact on surrounding land uses.

2. **Suitability of the Site** – The subject site is highly suitable for the proposed development, as it is directly adjacent to the newly constructed SBA warehouse and distribution centre. It also presents a suitable platform for development in that it is flat, is located within close proximity of key road infrastructure and has limited environmental constraints.

3. **Community and Stakeholder Engagement** – This EIS and supporting reports have been prepared in accordance with the matters prescribed by the SEARs. A comprehensive level of community and stakeholder engagement has been undertaken for the proposed development.

4. **Noise and Vibration** – The acoustic assessment carried out by Renzo Tonin has quantified construction and operational noise emissions from the proposed development and has assessed noise at the nearest sensitive receivers. Based on the assumptions and inputs the assessment, it has been established that operation of the site is capable of complying with relevant EPA and Council noise emission requirements.

5. **Air Quality and Odour** – The AQIA does not predict any non-compliance (exceedance) of the relevant impact assessment criteria at any identified receptor location. Notwithstanding, a range of management and control measures have been recommended to offer effective air quality management.

6. **Traffic and Transport** – Sufficient access and parking arrangements are provided as part of the proposed development, ensuring that there would be no undue impact on the surrounding road network.

7. **Urban Design and Visual Assessment** – As clearly demonstrated in the submitted Architectural Plans and Visual Impact Analysis the proposed development provides a suitable urban design outcome that reflects the existing locality.

8. **Food safety** – The relevant food safety standards and requirements will be met and maintained.

9. **Waste** – A Waste Management Plan has been provided, which considers construction and operational waste measures to be undertaken for the proposed development. All buildings have considered the provision for waste management areas to ensure the effective management and disposal of waste can occur.

10. **Soils and Water** – Water reuse and rainwater harvesting has been considered for the proposed development. The stormwater design of the proposed manufacturing facility is in accordance with Council's detention, water quality and flooding requirements as well as engineering best practice principles, hence it can be ensured that there will be minimal impact on the existing environment as a result of the proposed development.

11. **Infrastructure Requirements** – The proposed development seeks to ensure that future planned infrastructure can be accommodated to support the growth of the area and beyond.

12. **Fire and Incident Management** – The facility would only be classified as potentially hazardous and would be permitted within the current land zoning for the site

13. **Hazards and Risks** – The storage of DGs has been analyse, and it is concluded that the risks at the site boundary are not considered to exceed the acceptable risk criteria; hence, the facility would only be classified as potentially hazardous and would be permitted within the current land zoning for the site.

14. **Bushire and Incident Management** – Bushfire risk is considered low. In addition, the new industrial manufacturing facility (within Lot 10) will provide compliance with the PBP 2019 requirements for water supply, access, landscaping and evacuation.

15. **Ecologically Sustainable Development** – The proposed development would aim to achieve a high Green Star Rating by applying ESD principles.

16. **Biodiversity** – A BDAR wavier has been sought.

17. **Planning agreement / Development contributions** – Satisfactory arrangements have been made to the provision of regional infrastructure and will be made to the necessary local infrastructure where required.

Based on the findings of this EIS, it is concluded that the proposed development would support the continued and targeted industrial operations in the Western Sydney Region. The proposal would contribute to the retention and growth of industries, across both NSW and Australia. The proposed development is therefore considered suitable from both a local and regional context and is considered orderly and appropriate, based on social, cultural, economic and environmental matters.

Given the above reasons and the satisfaction of both of the Objects of the EP&A Act and the aims of WSEA SEPP, it is recommended that the proposed development, for the purposes of an industrial food manufacturing facility, be supported subject to relevant and reasonable condition.