



Planning &
Environment

STATE SIGNIFICANT DEVELOPMENT ASSESSMENT
Warehouse and Logistics Hub (SSD 7500)
5 and 9 Culverston Road, Minto, Campbelltown



Environmental Assessment Report
Section 89H of the
Environmental Planning and Assessment Act 1979

June 2017

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ABBREVIATIONS AND DEFINITIONS

AHD	Australian Height Datum
Applicant	Minto Properties Pty Ltd
AS	Australian Standard
ARI	Average Recurrence Interval 100 year
CEMP	Construction Environmental Management Plan
CIV	Capital Investment Value
CLEP	<i>Campbelltown Local Environmental Plan 2015</i>
CLM Act	<i>Contaminated Land Management Act 1997</i>
Construction	The demolition of buildings or works, the carrying out of works, including bulk and detailed earthworks and erection of buildings and other infrastructure covered by the application
Council	Campbelltown City Council
DA	Development Application
Day	The period from 7 am to 6 pm on Monday to Saturday, and 8 am to 6 pm on Sundays and Public Holidays
Demolition	The removal of buildings, sheds and other structures on the site
Department	Department of Planning and Environment or its successors
Development	The Development as described in the EIS and RTS and approved by this Development consent for the construction and operation of a warehouse and distribution facility and supporting estate civil works
DPI	Department of Primary Industries
EIS	Environmental Impact Statement titled <i>Proposed Warehouse and Logistics Hub, 5 and 9 Culverston Road, Minto, Lot 3 DP 817793 and Lot 400 DP 875711</i> , prepared by Willowtree Planning, dated 3 June 2016
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2000</i>
EPA	Environment Protection Authority
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPI	Environmental Planning Instrument
LEP	Local Environmental Plan
Minister	Minister for Planning
NCC	National Construction Code
NOW	NSW Office of Water
OEH	Office of Environment and Heritage
OoHW	Out of Hours Work
OSD	On-site detention
PMF	Probable Maximum Flood
RAP	Remedial Action Plan
RMS	Roads and Maritime Services
RTS	Response to Submissions titled <i>Response to Submissions, State Significant Development Application (SSD 7500) Proposed Warehouse & Logistics Hub 5 & 9 Culverston Road, Minto (Lot 3 in DP 817793 & Lot 400 in DP 875711)</i> , prepared by Willowtree Planning, dated 7 October 2016 and all appendices
SAS	Site Audit Statement under the <i>Contaminated Land Management Act 1997</i>
SEARs	Secretary's Environmental Assessment Requirements
Secretary	Secretary of the Department of Planning and Environment or nominee
Sensitive Receiver	Residence, education institution, health care facility, religious facility and child care facility
Site	5 and 9 Culverston Road, Minto. Legally described as Lot 3 DP 817793 and Lot 400 DP 875711
SRD SEPP	<i>State Environmental Planning Policy (State and Regional Development) 2011</i>
SSD	State Significant Development
Supplementary	The supplementary Response to Submissions, prepared by Willowtree Planning, dated 1 March 2017 and all appendices
RTS	March 2017 and all appendices
UST	Underground storage tank

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EXECUTIVE SUMMARY

Willowtree Planning Pty Ltd, on behalf of Minto Properties Pty Ltd (the Applicant), has lodged a development application (DA) and accompanying Environmental Impact Statement (EIS) seeking consent to construct and operate a warehouse and logistics hub at 5 and 9 Culverston Road in the suburb of Minto in the Campbelltown local government area (LGA) (SSD 7500).

The subject site is located 2.7 kilometres (km) north-east of the Campbelltown town centre and covers 29.36 hectares (ha) of land zoned for general industrial uses near Campbelltown Road and the Hume Highway. The site is a brownfield industrial site currently occupied by Prixcar Services Limited under lease, which provides services for pre-delivery inspection, storage, processing and washing of vehicles. The existing operation comprises of one warehouse building, an office building, two car wash bays, fuel storage and extensive car storage spaces with hail mesh structures. The site is generally cleared of vegetation with the exception of perimeter plantings. Existing industrial activities occur near the site to the north, east and west.

The DA proposes to demolish all existing structures and hardstand, remediate part of the site, undertake bulk and detailed earthworks, augment existing site infrastructure and construct, fit-out and operate four warehouse buildings ranging in size from 22,000 m² to 40,000 m² with ancillary office space.

The proposal is State significant development (SSD) under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) as it satisfies clause 12 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP) being for the construction of a warehouse or distribution centre with a capital investment value (CIV) of over \$50 million. Consequently, the Minister for Planning is the consent authority for the Development.

The Department exhibited the DA and accompanying EIS from 15 June 2016 to 1 August 2016 and received a total of nine submissions, including submissions from Campbelltown City Council and other government agencies. No submissions from the general public were received.

Key concerns raised in the submissions related to traffic impacts on the local road network, stormwater and flooding, contamination and visual impacts from the external storage of containers.

The Department's assessment of the application has fully considered all relevant matters under Section 79C of the EP&A Act, the objects of the EP&A Act and the principles of ecologically sustainable development. The Department identified traffic and access, stormwater and flooding, contamination and a variation to the height of buildings development standard under the *Campbelltown Local Environmental Plan 2015* as key issues for assessment.

The Department's assessment concludes the proposed development would result in some amenity impacts associated with the proposed development. The Department has recommended a number of conditions to manage traffic, flooding, contamination and visual amenity including:

- the preparation and implementation of relevant construction and operational management plans;
- the preparation of a stormwater management plan and flood evacuation plan;
- engaging an EPA site Auditor and the implementation of an endorsed Remedial Action Plan;
- obtaining a Site Audit Statement Section A to verify the site is made suitable for the intended industrial/commercial uses following the completion of on-site remediation works; and
- requiring the Applicant to limit the height of container stacks on the external storage area.

The Department has concluded the impacts of the proposed development can be mitigated and/or managed to ensure an acceptable level of environmental performance, subject to the implementation of the recommended conditions of consent. Further, the proposed development would provide employment opportunities in South West Sydney consistent with the Premier's key priorities and the goals, directions and actions outlined in *A Plan for Growing Sydney* and the *Draft South West District Plan*.

Consequently, the Department considers the development is in the public interest and should be approved, subject to conditions.

1. BACKGROUND

1.1. The Department's Assessment

This report details the Department's assessment of a State significant development (SSD 7500) for a proposed warehouse and logistics hub at 5 and 9 Culverston Road, Minto. The proposed development involves the construction and operation of four warehouse buildings, demolition of existing structures and hardstand, remediation, bulk and detailed earthworks, access roads, infrastructure services, parking and landscaping. The Department's assessment considers all documentation submitted by the Applicant, including the Environmental Impact Statement (EIS) and Response to Submissions (RTS) and submissions received from public authorities. The Department's assessment also considers the legislation and environmental planning instruments (EPI) relevant to the site and the development.

This report describes the proposed development, surrounding environment, relevant strategic and statutory planning and the issues raised in submissions. The report evaluates the key issues associated with the development and provides recommendations for managing any impacts during construction and operation. The Department's assessment of the application has concluded the development is in the public interest and should be approved, subject to conditions.

1.2. Development Background

Willowtree Planning, on behalf of Minto Properties Pty Ltd (the Applicant), has lodged a development application (DA) and accompanying Environmental impact Statement (EIS), seeking consent to construct, fit-out and operate a new warehousing and logistics hub at 5 and 9 Culverston Road, Minto in the Campbelltown local government area (LGA). The site is located 50 kilometres (km) south-west of the Sydney city centre, 40 km from Sydney Airport and 2.7 km north-east of the Campbelltown town centre (see **Figure 1**).



Figure 1: Site Location

1.3. Site Description

The site is 29.36 hectares (ha) in area and is zoned IN1 - General Industrial under the *Campbelltown Local Environmental Plan 2015*. The site consists of two lots, legally described as Lot 3 DP 817793 and Lot 400 DP 875711.

The site has street frontages with Airs Road to the north and Rose Payten Road to the south, elevated above the site. The Main Southern Railway runs along the eastern frontage of the site. Culverston Road extends south into the site from a three-way roundabout with Airs Road (see **Figures 2, 3 and 4**).

The site is surrounded by existing waterways. Bow Bowing Creek (a constructed channel) runs along the western boundary of the site. Drainage systems to the east service smaller external catchments

and the Main Southern Railway. A historical channel meanders through the site from north to south, which was filled between 1970 and 1975 and realigned to the current constructed Bow Bowing Creek to allow the historical development of the site in 1978. Two earthen bunds run from the north to the south, parallel to Culverston Road associated with the historical and existing use of the site. The site is a brownfield industrial site currently occupied by Prixcar Services Limited under lease, which provides services for pre-delivery inspection, storage, processing and washing of vehicles.

The current operation has been in place since at least 2005. The site has been extensively modified, and is generally clear of vegetation, with the exception of planting along the site boundaries and Culverston Road. The site is largely impervious consisting of hardstand, asphalt seal spray, shade structures and warehouse and office buildings (see **Figures 5, 6 and 7**).



Figure 2: Site Layout

Note: Numbers in Figure 2 refer to detailed site images below



Figure 3: Ben Bowing Creek Looking South along the Western Boundary (1)



Figure 4: Looking West down Airds Road (2)



Figure 5: Looking North up Culverston Road (3)



Figure 6: Existing Warehouse Building On-Site (4)



Figure 7: Looking South down Culverston Road (5)

1.4. Surrounding Land Uses

The site is located in an existing industrial area. Surrounding land uses include:

- IN1 - General Industrial zoned land to the north, east and west with existing warehousing, manufacturing, automotive and industrial operations including Kennard's Storage, Toto Tires, Costpak and Unilever;
- SP2 - Infrastructure zoned land comprising of drainage, road and rail infrastructure including Bow Bowing Creek, Rose Payten Drive, a car park and the Main Southern Railway immediately to the north, east, south and west;
- B5 - Business Development zoned land is to the south east, containing automotive related businesses; and
- RE1 - Public Recreation and RE2 - Private Recreation zoned land comprising tennis courts and the Campbelltown Sports Stadium to the south (see **Figure 8**).

Nearby residential areas include the R2 - Low Density Residential suburbs of Woodside to the west and Leumeah and Minto to the east and south. The nearest residential receiver is located approximately 300 m to the west at 20 Queenscliff Drive in Woodbine. This property backs onto Campbelltown Road.

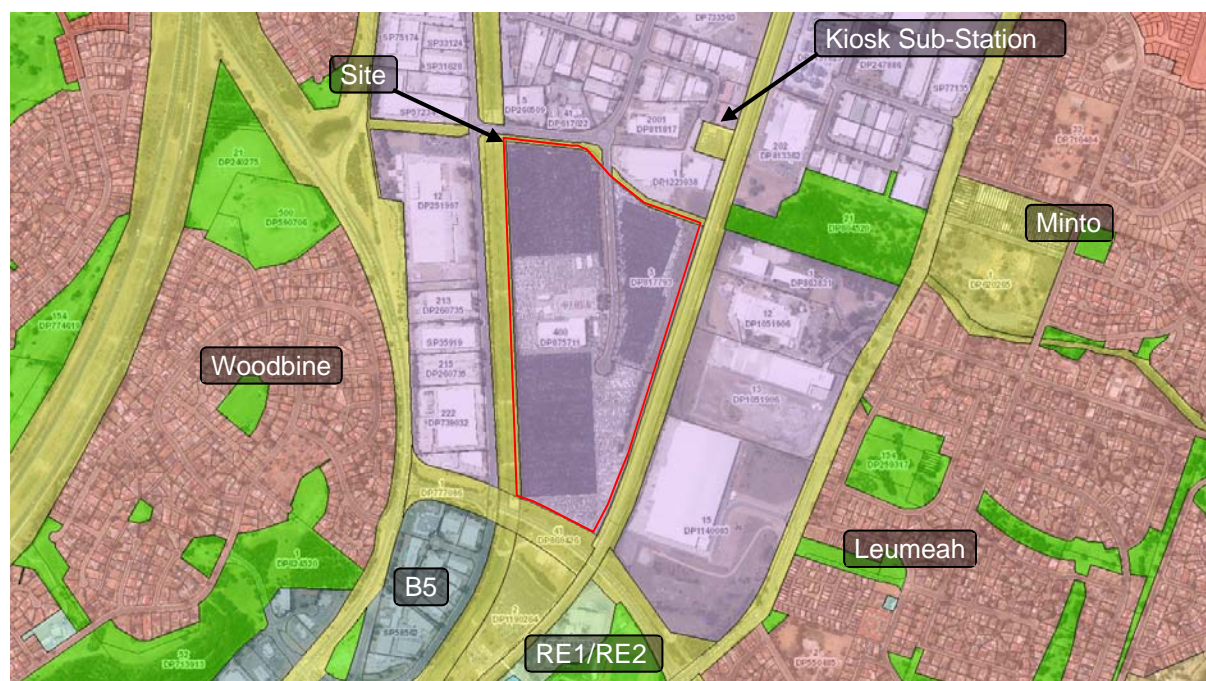


Figure 8: Local Zoning Context

2. PROPOSED DEVELOPMENT

2.1. Description of the Development

The Applicant proposes to demolish the existing structures on-site and construct and operate a warehouse and logistics hub. The major components of the proposed development are summarised in **Table 1**, shown in **Figures 9 to 11**, and described in full in the EIS, included in **Appendix D**.

Table 1: Main Development Components

Component	Description
Development Summary	Staged demolition of existing on-site structures and construction, fit-out and use of four warehouse buildings, bulk earthworks, remediation, upgrades to access roads, parking, drainage and landscaping providing 112,000 m ² of warehouse space and 5,000 m ² of office space and 6.9 ha of external hardstand for warehousing logistics uses.
Subdivision	<ul style="list-style-type: none"> no subdivision is proposed under the application.
Demolition	<ul style="list-style-type: none"> demolition of existing warehouse and office buildings, hardstand and hail structures.
Bulk Earthworks	<ul style="list-style-type: none"> bulk earthworks to create level building pads for each warehouse with 12,350 m³ of cut, and 243,750 m³ of fill to be imported to the site.
Remediation	<ul style="list-style-type: none"> a Remedial Action Plan (RAP) to remediate hydrocarbon impacted soils in the central portion of the near existing fuel storage areas from the sites historical use.
Construction Staging	<p>Construct four warehouse buildings and associated office space over three stages (see Figure 9), including:</p> <ul style="list-style-type: none"> Stage 1 - warehouse 1A covering 40,000 m² of warehouse space and 2,000 m² of office space and 69,066 m² of outdoor storage space; Stage 2 - warehouses 1B and 1C both with 22,000 m² of warehouse space and 1,000 m² of office space covering a total of 46,000 m²; and Stage 3 - warehouse 1D covering 23,000 m² of warehouse space and 1,000 m² of office space.
Occupation of Warehouse Buildings	<ul style="list-style-type: none"> dependent on tenants, likely to be used for warehousing and distribution of fast moving consumer goods, packing and automotive and mechanical parts; and no manufacturing undertaken on site.
External Storage	<ul style="list-style-type: none"> use of the external hardstand storage to store shipping containers in stacks of two.
Traffic and Access	<ul style="list-style-type: none"> forecast of 2,566 vehicles trips per day consisting of 2,352 heavy vehicle trips and 214 car trips; and an additional 110 trips during the morning peak and 121 trips during the evening peak over existing road traffic volumes.
Roads and Parking	<ul style="list-style-type: none"> 481 car parking spaces; and

	<ul style="list-style-type: none"> • 147 provisional car parking space.
Ancillary Infrastructure	<ul style="list-style-type: none"> • upgrades to existing infrastructure as required to service the proposed development.
Landscaping	<ul style="list-style-type: none"> • retention of existing on-site vegetation where practical and feasible; and • installation of internal and perimeter landscaping with a mix of native trees, shrubs and grasses along the western and northern site frontages to Airds Road and along the southern site frontage to Rose Payten Drive.
Signage	<ul style="list-style-type: none"> • estate, directional and business identification signage.
Clause 4.6 Variation	<ul style="list-style-type: none"> • request to exceed the site height limit of 12 m by 1.7 m (14.17% increase).
Hours of Operation	24 hours a day, seven days a week.
CIV	\$141,550,000.
Employment	<ul style="list-style-type: none"> • construction - up to 300 jobs; and • operation - up to 300-400 jobs.

2.2. Applicant's Need and Justification for the Development

The Applicant has justified the proposed development on the basis it would support the directions and actions in *A Plan for Growing Sydney* and provide direct and indirect employment benefits near homes in the Campbelltown area by redeveloping an existing industrial site that:

- is compatible with the existing use of the site and is complementary to other industrial uses in the locality;
- would preserve the use of the site for employment generating purposes;
- would provide high quality warehouse and logistics facilities to accommodate a range of industrial uses to support a range of end users;
- is highly accessible via the local and regional road network; and
- is devoid of any significant environmental risk.

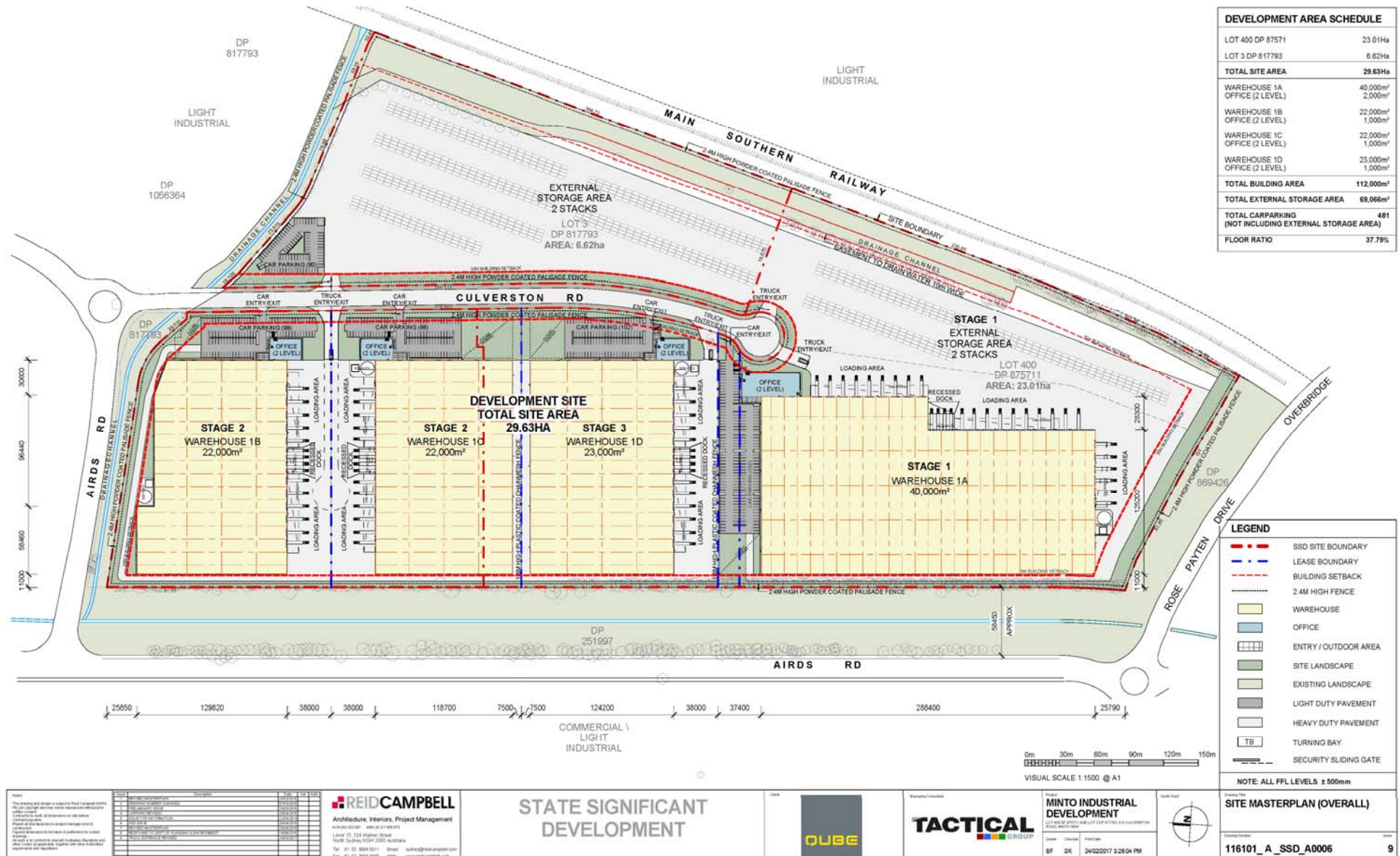


Figure 9: Proposed Development

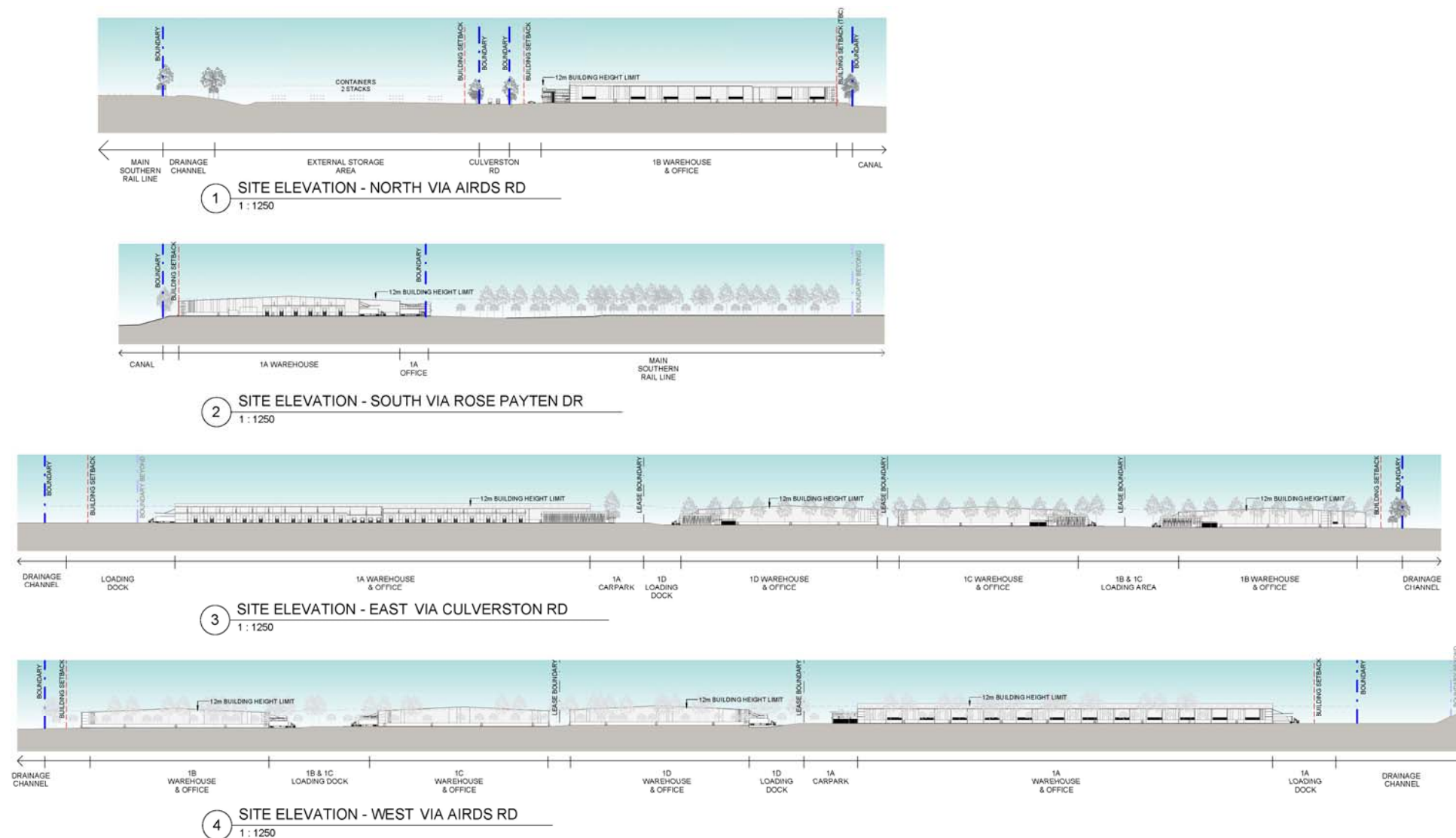


Figure 10: Proposed Elevations

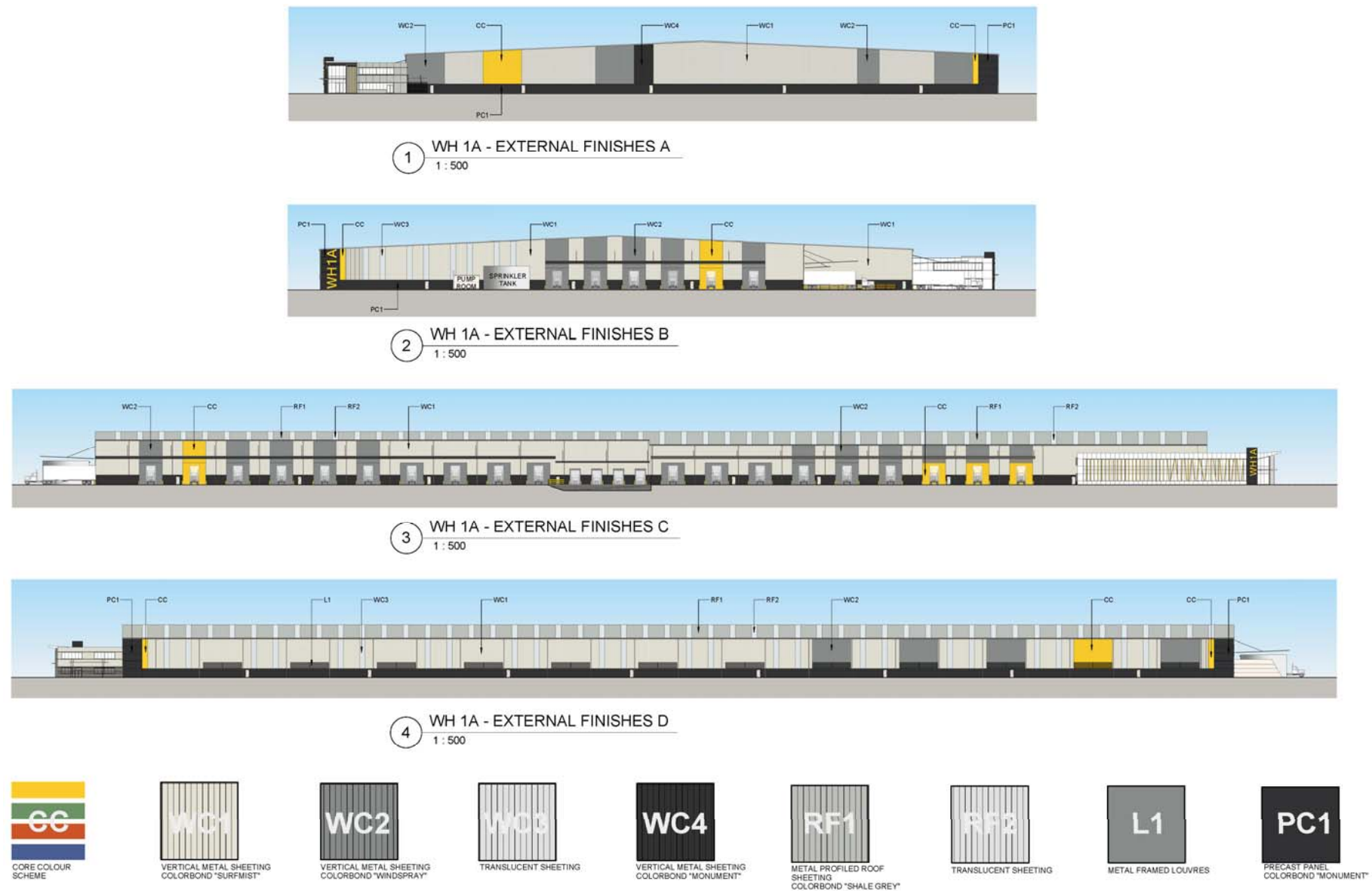


Figure 11: Warehouse 1A (Largest of the Four Proposed Warehouses) with Proposed Finishes

3. STRATEGIC AND STATUTORY CONTEXT

3.1. Strategic Context

The NSW Government has announced the Premier's Priorities which cover 12 key areas including economic growth, provision of infrastructure, protection of vulnerable communities, improving education and environmental protection. One of the Premier's key priorities is 'Creating Jobs'. The NSW Government aims to provide 150,000 new jobs over the next four years.

Construction and operation of the development would contribute toward 'Creating Jobs' by providing 300 construction jobs and 300 to 400 operational jobs in the Campbelltown LGA. The development also represents a \$141 million capital investment in industrial development in the region.

The development is also consistent with the goals, directions and actions outlined in *A Plan for Growing Sydney* as it will:

- assist in the transformation of Western Sydney by providing growth and investment in an identified industrial precinct with high levels of accessibility to the regional road network, and existing and planned public transport and cycle infrastructure (Direction 1.4);
- provide additional employment opportunities within close proximity to existing residential developments in Western Sydney (Direction 1.4); and
- support the development of a priority economic sector by developing appropriately zoned industrial land (Direction 1.9).

The Greater Sydney Commission has released the draft of six district plans encompassing Greater Sydney which will guide the delivery of *A Plan for Growing Sydney*. The draft district plans set out the vision, priorities and actions for the development of each district. The proposed development is located within the South West District which is identified as an area of diverse employment activities including strategic industrial precincts. As the site is located within an existing industrial area, the site would continue to be used for industrial purposes and would cater to the increased demand for warehousing and distribution facilities in the Campbelltown-Macarthur to Liverpool urban corridor.

3.2. State Significant Development

The development is State significant development pursuant to Section 89C of *Environmental Planning and Assessment Act 1979* (EP&A Act) because it is a warehouse and distribution centre with a CIV of more than \$50 million which meets the criteria in Clause 12 of Schedule 1 in *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP). Consequently, the Minister for Planning is the consent authority for the proposed development.

3.3. Permissibility

The site is zoned IN1 - General Industrial under the *Campbelltown Local Environmental Plan 2015* (CLEP). Warehouse and distribution centres are permissible with consent within the IN1 zone. Therefore, the Minister or delegate may determine the development application.

3.4. Consent Authority

On 16 February 2015, the Minister delegated the functions to determine SSD applications to the Executive Director, Key Sites and Industry Assessments where:

- the relevant local council has not made an objection; and
- there are less than 25 public submissions in the nature of objections; and
- a political disclosure statement has not been made.

Of the nine submissions received, none objected to the proposed development and no submissions were received from the general public. In addition, Council did not object to the development. No reportable political donations were made by the Applicant in the last two years and no reportable political donations were made by any persons who lodged a submission. Accordingly, the application can be determined by the Executive Director, Key Sites and Industry Assessments under Ministerial delegation.

3.5. Other Approvals

Under Section 89K of the EP&A Act, other approvals may be required and must be approved in a manner that is consistent with any Part 4 consent for the SSD under the EP&A Act.

3.6. Considerations under Section 79C of the EP&A Act

Section 79C of the EP&A Act sets out matters to be considered by a consent authority when determining a DA. The Department's consideration of these matters is set out in **Section 5** and **Appendix B**. In summary, the Department is satisfied the proposed development is consistent with the requirements of Section 79C of the EP&A Act.

3.7. Environmental Planning Instruments

Under Section 79C of the EP&A Act, the consent authority, when determining a DA, must take into consideration the provisions of any environmental planning instrument (EPI) and draft EPI (that has been subject to public consultation and notified under the EP&A Act) that apply to the development.

The Department has considered the development against the relevant provisions of several key environmental planning instruments including:

- *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP);
- *State Environmental Planning Policy (Infrastructure) 2007*;
- *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development* (SEPP 33);
- *State Environmental Planning Policy No. 55 – Remediation of Land* (SEPP 55);
- *State Environmental Planning Policy No. 64 – Advertising Structures and Signage* (SEPP 64); and
- *Campbelltown Local Environmental Plan 2015* (CLEP).

The development seeks to exceed the height limit under the Clause 4.3(2) of the CLEP. The Applicant has submitted a written request for an exception to the height of buildings development standard under Clause 4.6 of the CLEP. Clause 4.6(4)(b) states the concurrence of the Secretary is required in considering a request to vary a development standard. However, Clause 79B(2A) of the EP&A Act states the Secretary's concurrence is not required for SSD, unless an EPI specifies that it applies to SSD. The CLEP does not specify that the Secretary's concurrence is required for SSD. The Department's assessment of the Applicant's clause 4.6 request is at **Section 5.4** of this report.

Development Control Plans (DCPs) do not apply to SSD under Clause 11 of the SRD SEPP.

Detailed consideration of the provisions of all EPIs applying to the development is provided in **Appendix C**. The Department is satisfied the development generally complies with the relevant provisions of these EPIs.

3.8. Public Exhibition and Notification

Under Section 89F(1) of the EP&A Act, the Secretary is required to make the DA and any accompanying information of an SSD application publicly available for at least 30 days. The application was on public exhibition from **15 June 2016** to **1 August 2016**. Details of the exhibition process and notifications are provided in **Section 4.1**.

3.9. Objects of the EP&A Act

In determining the application, the consent authority should consider whether the development is consistent with the relevant objects of the EP&A Act. These objects are detailed in Section 5 of the EP&A Act. The objects of relevance to the merit assessment of this application include:

- (a) *to encourage:*
 - (ii) *the promotion and co-ordination of the orderly and economic use and development of land,*
 - (vi) *the protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats, and*
 - (vii) *ecologically sustainable development, and*
- (b) *to promote the sharing of the responsibility for environmental planning between the different levels of government in the State, and*
- (c) *to provide increased opportunity for public involvement and participation in environmental planning and assessment.*

The Department has fully considered the objects of the EP&A Act, including the encouragement of Ecologically Sustainable Development (ESD), in its assessment of the application (see **Table 2**).

Table 2: Considerations against the objects of the EP&A Act

Object	Consideration
5(a)(ii)	The development would ensure the orderly and economic use of land, which is zoned for industrial use. The development would also deliver augmented drainage infrastructure to facilitate the development of the site.
5(a)(vi)	The Department's assessment in Section 5 of this report demonstrates with the implementation of the recommended conditions of consent, the impacts of the development can be mitigated and/or managed to ensure the environment is protected.
5(a)(vii)	The site preparation works for this development include site clearing, demolition, earthworks and remediation of existing hardstand and structures and are the subject of this report. The site does not contain any existing vegetation but does contain existing perimeter landscaping. Stormwater services would be augmented under the proposed development to manage stormwater flows. The warehouse buildings would include design measures to improve energy efficiency in accordance with the National Construction Code (NCC) The development is therefore consistent with the principles of ESD.
5(b)	The Department has assessed the development in consultation with, and giving due consideration to, the technical expertise and comments provided by other Government authorities (including Campbelltown City council) (see Section 4). This is consistent with the object of sharing the responsibility for environmental planning between the different levels of government in the State.
5(c)	The application was exhibited in accordance with Section 89F (1) of the EP&A Act to provide public involvement and participation in the environmental planning and assessment of this application.

3.10. Ecologically Sustainable Development

The EP&A Act adopts the definition of ESD found in the *Protection of the Environment Administration Act 1991*. Section 6(2) of that Act states ESD requires the effective integration of economic and environmental considerations in decision-making processes and ESD can be achieved through the implementation of:

- (a) *the precautionary principle;*
- (b) *inter-generational equity;*
- (c) *conservation of biological diversity and ecological integrity; and*
- (d) *improved valuation, pricing and incentive mechanisms.*

The potential environmental impacts of the development have been assessed and, where potential impacts have been identified, mitigation measures and environmental safeguards have been recommended.

As demonstrated by the Department's assessment in **Section 5** of this report, the proposed development is not anticipated to have any adverse impacts on native flora or fauna, including threatened species, populations and ecological communities, and their habitats. The development site has been cleared since 1984 and would remove existing landscape vegetation along the site perimeter and along Culverston Road. As such, the Department considers the proposed development would not adversely impact on the environment and is consistent with the objectives of the EP&A Act and the principles of ESD.

4. CONSULTATION AND SUBMISSIONS

4.1. Consultation

The Applicant, as required by the Secretary's Environmental Assessment Requirements (SEARs), undertook consultation with relevant local and State authorities as well as the community and affected landowners. The Department undertook further consultation with these stakeholders during the exhibition of the EIS and throughout the assessment of the application. These consultation activities are described in detail in the following sections.

4.1.1. Consultation by the Applicant

The Applicant undertook consultation with relevant local and State authorities as well as nearby landowners as required by the SEARs during the preparation of the EIS. This consultation included:

- meetings with Council and key government agencies; and
- a mail drop of the EIS to nearby residencies.

4.1.2. Consultation by the Department

The Department undertook a range of consultation activities throughout the preparation of the SEARs including consultation with relevant public authorities.

After accepting the EIS, the Department:

- made it publicly available from **15 June 2016** until **1 August 2016** (58 days due to school holidays):
 - on the Department's website;
 - at the Department's Information Centre (Pitt Street, Sydney);
 - at the Department's Office (Valentine Street, Parramatta); and
 - at Campbelltown City Council (Queen and Broughton Streets, Campbelltown);
- notified landowners in the vicinity of the development about the exhibition period by letter;
- notified relevant State government authorities, and Campbelltown City Council by letter; and
- advertised the exhibition in the Macarthur Chronicle and the Campbelltown-Macarthur Advertiser.

A total of nine submissions were received by the Department in response to the exhibition. All submissions were received from Council and government agencies. No submissions were received from the public or special interest groups. A summary of the issues raised in the submissions is provided below. A full copy of these submissions is included in **Appendix F**.

4.2. Submissions

4.2.1. Public Authorities

Campbelltown City Council (Council) did not object to the proposed development, however it raised a number of issues including:

Planning/Visual

- Council objects to any outdoor storage areas not appropriately screened;
- the activities and goods to be stored in the external storage areas should be clarified and the height of proposed goods confirmed. Council would not support container stacks greater than two containers in height from the existing ground level;
- fencing and outdoor storage areas do not comply with the Campbelltown Sustainable City Development Control Plan 2015; and
- each warehouse building should include a 100,000 litre rainwater tank.

Traffic

- concern regarding internal queue lengths exiting the site and the chosen traffic generation rates;
- traffic impacts should be considered along Swaffham Road;
- potential to increase the degree of saturation for Campbelltown Road/Rose Payten Drive;
- clarify the proportion of heavy vehicles in peak hours; and
- clarify the longest vehicles to access the site and provide swept path analysis.

Flooding

- drainage should be provided in accordance with Campbelltown City Council Engineering Design Guide for Development;
- the capacity of existing stormwater infrastructure should be assessed for future connections from the proposed development;
- the MUSIC and DRAINS models in the EIS should be provided to Council for assessment; and
- a stormwater management plan should be prepared and provided to Council.

Endeavour Energy did not object to the proposed development and advised:

- the site is near overhead transmission lines and associated easements;
- Culverston Road may contain asbestos or asbestos containing materials in the electricity network;
- large trees near electricity infrastructure are not supported; and
- recommended conditions of consent for the management of construction and operational impacts of the development on its infrastructure including the need for the Applicant to apply to connect to the electricity network and provided advice to relocate the easement affecting the site.

Office of Environment and Heritage (OEH) did not object to the proposed development and provided comments on floodplain risk. OEH advised the evacuation planning methodology in the EIS is reasonable. OEH recommended the concept drainage plan be confirmed at the detailed design stage along with the evacuation plan.

Department of Primary Industries (DPI) did not object to the proposed development and advised construction dewatering may require a license from DPI under the *Water Management Act 2000*.

Road and Maritime Services (RMS) did not object to the proposed development and provided no comments or recommended conditions.

Transport for NSW (TfNSW) did not object to the proposed development and recommended conditions of consent requiring the Applicant to prepare a Construction Traffic Management Plan and a Workplace Travel Plan.

WaterNSW did not object to the proposed development and advised Bow Bowing Creek is not under WaterNSW ownership and the proposal is not in proximity to any WaterNSW owned infrastructure.

TransGrid did not object to the proposed development and advised it is not near any TransGrid infrastructure.

Geological Survey NSW did not object and raised no concerns.

No submission was received from the **Environment Protection Authority (EPA)** during the exhibition period, but provided comment on the RTS detailed in **Section 4.3**

No submission was received from the **Australian Rail Track Corporation**.

The Department has reviewed the comments from government authorities and has requested the Applicant prepare a RTS report to address the issues raised.

4.2.2. General Public

No submissions were received from the general public.

4.3. Response to Submissions

On 12 October 2016, the Applicant submitted its RTS report addressing the issues raised in the government authority submissions (see **Appendix G**).

The RTS confirmed the external storage area will be used to store stacks of freight containers up to two containers high, holding general consumer goods.

The RTS included:

- a Phase 2 detailed Contamination Assessment;
- a Remedial Action Plan (RAP);
- building elevation plans showing the 12 m height limit under the CLEP;
- revised landscape plans showing additional detail of the proposed landscape treatments on-site;
- a signage strategy showing the location and type of estate and directional signage;
- plans and details of the proposed external storage area;
- additional perspectives of the site including the external container storage area;
- an addendum TIA confirming anticipated construction traffic volumes and assumptions used; and
- a response report for flooding and stormwater impacts of the proposed development.

The RTS was referred to Council and the EPA.

The EPA advised the development does not require an Environment Protection Licence (EPL) under the *Protection of the Environment Operations Act 1997* (POEO Act). The EPA also noted the current on-site contamination levels may trigger the need to formally notify the EPA under Section 60 of the *Contaminated Land Management Act 1997* (CLM Act). The EPA recommended the RAP be revised to include detailed information on the remediation and management of contaminated groundwater rather than be addressed as part of a Construction Environmental Management Plan (CEMP). The EPA also

advised the Applicant should provide a Site Audit Statement (SAS) Section B to certify the RAP is able to make the site suitable for its intended use.

Due to the requirements of SEPP 55, the Department requested the Applicant revise its RTS to address the issues raised by the EPA. On 11 March 2017, the Applicant submitted a supplementary RTS which included additional swept path analysis, revised site plans and access designs for warehouse 1B and 1C and an updated RAP. However, the Applicant did not provide a SAS Section B and reiterated its position that groundwater contamination should be addressed via management measures in a CEMP.

The Department has considered the issues raised in submissions, the RTS and the supplementary concerns raised in its assessment of the development in **Section 5** below.

5. ASSESSMENT

The Department has considered the EIS, the issues raised in the submissions and the Applicant's RTS in its assessment of the proposed development. The Department considers the key assessment issues are:

- traffic, access and parking;
- stormwater and flooding;
- contamination; and
- the clause 4.6 variation to height of buildings development standard.

A number of other issues have also been considered. These issues have been considered to be minor and are addressed in **Table 3** under **Section 5.5**.

5.1. Traffic, Access and Parking

The site is located an existing industrial area with several connections to the regional and classified road network. The proposed development would generate additional light and heavy vehicle movements to, from and within the site during construction and operation which has the potential to impact on the capacity and efficiency of the local road network.

The EIS included a Traffic Impact Assessment (TIA), prepared by Ason Group. The TIA assessed the potential traffic and parking impacts of the construction of bulk earthworks and estate wide infrastructure as well as the construction and operation of the proposed warehouse buildings. The TIA was prepared with reference to the *RMS Guide for Traffic Generating Development* (RMS Guide), its supplements and relevant Australian Standards.

Site Access

Airds Road is the main link from the arterial and sub-arterial road network to the site. Key nearby arterial roads include the Hume Highway and Campbelltown Road to the east and Pembroke Road to the west. Key sub-arterial roads include Rose Payten Road to the south and Ben Lomond Road to the north (see **Figure 12**).

Access to the site during operation and construction will be via Culverston Road (see **Figure 9**). Each warehouse building would have separate driveways for staff and heavy vehicle access from Culverston Road. Heavy vehicle access to warehouses 1B and 1C would share a single driveway and central hardstand/circulation area.

The proposed design provides a total of 71 loading docks of which 16 would be recessed. The primary haul route to and from the site would be via Campbelltown Road, with trucks accessing the site from the Hume Highway either via the Campbelltown Road interchange from the north or the Narellan Road interchange via Blaxland Road from the south. Both of these routes are currently identified as heavy vehicle routes up to B-Doubles by the RMS.

RMS raised no issues regarding site access from Culverston Road. Council requested additional swept path analysis for two-way access to each warehouse building be provided. Council also raised concerns about internal queuing lengths and potential access impacts on proposed car parking in the north-east part of the site.

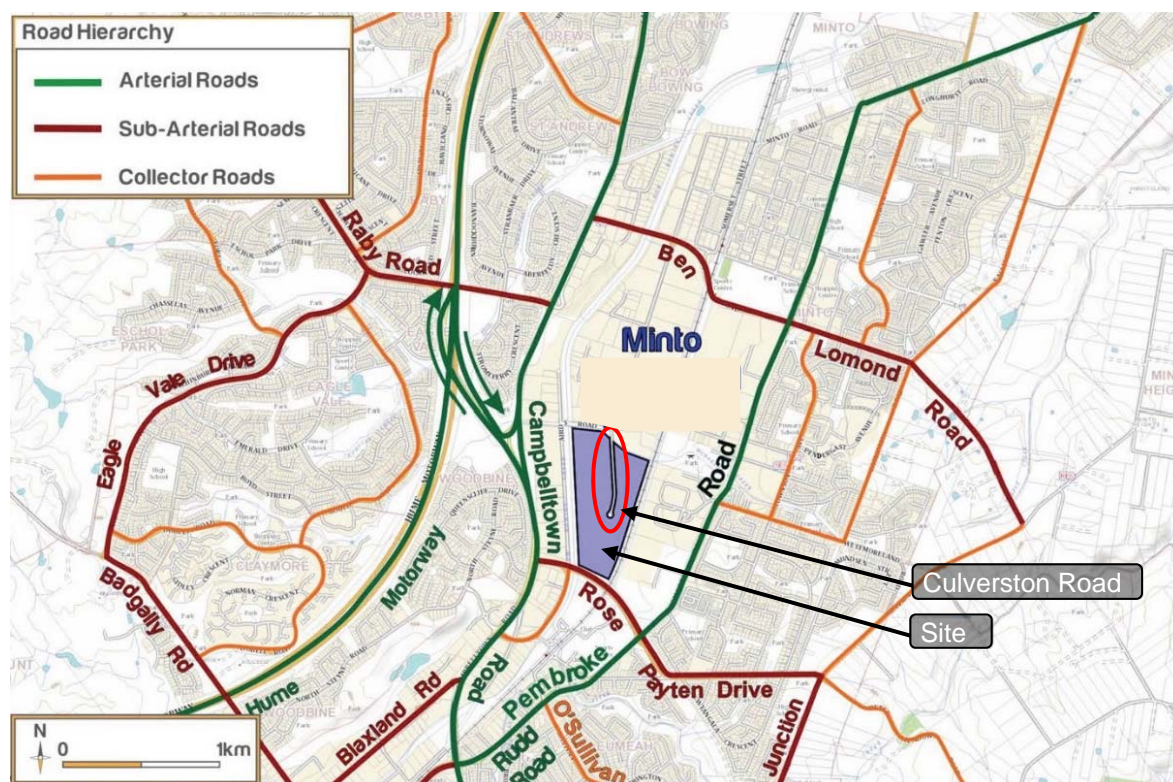


Figure 12: Local and Regional Road Network

The Applicant argues the proposed access arrangements are acceptable under AS2890.2-2002: *Parking facilities Off-Street commercial vehicle facilities*, which allows the swept path of the maximum size design vehicle on-site to occupy the entire width (less specified clearances) of a two-way access driveway when the vehicle is entering or leaving the minor road (in this case Culverston Road). The Applicant seeks to adopt this design for the driveways accessing warehouses 1B, 1C and 1D and does not intend to provide driveway widths for concurrent B-Double access. However, to address this issue, the Applicant provided revised swept path analysis in the supplementary RTS with the addition of splays on the driveways of warehouses 1C and 1B. The revised swept paths and splay arrangements show in/out B-Double movements can be accommodated for the current development layout to provide B-Doubles enough room to queue or manoeuvre so there is no impediment to traffic flows along Culverston Road.

The Department has reviewed the TIA and RTS and considers the proposed development layout would provide adequate access to, from and within the site during construction and operation for up to B-Double class vehicles without creating vehicle conflicts along Culverston Road. The Department has recommended conditions to ensure sufficient access is maintained during all phases of the proposed development.

Construction Traffic

Heavy vehicle movements would be generated from bulk earthworks, fill importation and delivery of construction equipment and materials. Construction would be carried out in three phases consisting of site preparation, earthworks and infrastructure; warehouse construction and fit-out; and site demobilisation, post-construction site rehabilitation, landscaping and finishing works. The Applicant has advised the proposed development would take 36 months to construct.

Construction activities are proposed during standard construction hours of Monday to Friday 7 am to 6 pm, Saturday 8 am to 1 pm and no works on Sundays and public holidays. However, the Applicant has advised some out of hours work (OoHW) may be needed to minimise disruption to the road network. The Department notes some construction activities may cause less disruption to the road network when done outside of standard construction hours but as the details of any OoHW are unknown, they are not currently supported due to their potential for adverse noise impacts. The Department's assessment of the noise impacts of OoHW is provided in **Table 3** at **Section 5.5**.

As part of the RTS, the Applicant advised peak traffic volumes would coincide with the busiest period of construction, which would generate up to 1,100 vehicle trips a day, with 700 light vehicle trips and 400 heavy vehicle trips. Construction traffic would also generate 125 vehicle trips in the morning peak and 75 trips in the afternoon peak. As discussed in the following section for operational traffic, these traffic volumes are lower than those anticipated during full operation of the proposed development and would not impact on the Level of Service (LoS) of the key nearby intersections of Campbelltown Road/Rose Payten Drive, Rose Payten Drive/Airds Road and Airds Road/Culverston Road.

Neither Council nor RMS raised any concerns regarding construction traffic. TfNSW requested the Applicant prepare and submit a Construction Traffic Management Plan (CTMP) to manage construction traffic.

The Department has reviewed the TIA, comments received and the anticipated construction traffic impacts of the proposed development. The Department's assessment concludes the existing local road network can accommodate construction traffic volumes. The Department has recommended conditions requiring the Applicant to prepare a CTMP in consultation with Council and RMS prior to the commencement of construction. The Department has also recommended conditions outlining requirements in the event the Applicant seeks to undertake OoHW, prior to undertaking any OoHW during the construction period of the development.

Operational Traffic

The TIA also considered the operational traffic impacts associated with additional vehicle movements to and from the site during operation. This included a 7 day, 24-hour traffic count survey of Culverston Road to establish existing traffic volumes associated with current on-site operations. The traffic count identified weekday peak hour traffic volumes along Culverston Road are:

- 65 trips during the morning peak hour; and
- 55 trips during the evening peak hour.

The TIA also applied the *RMS Guide to Traffic Generating Developments – Updated traffic surveys* (RMS Guide Update) to assess operational traffic volumes from the development and SIDRA modelling to determine the performance of the following three intersections during operation:

- Campbelltown Road/Rose Payten Drive (signalised intersection currently operating at LoS B - good operation with acceptable delays and spare capacity);
- Rose Payten Drive/Airds Road (roundabout intersection currently operating at LoS A - good operation); and
- Airds Road/Culverston Road (roundabout intersection currently operating at LoS A - good operation).

The TIA assessed the proposed development against the RMS Guide Update and adopted trip rates for Business Parks and Industrial Estate Developments. Using these rates, the TIA concluded it would generate 2,352 vehicle trips per day during operation. Out of these vehicle trips, 175 would occur in the morning peak and 176 would occur during the evening peak. Approximately 1,881 (80%) of these trips would consist of heavy vehicle trips, with the remaining 471 trips consisting of cars and light vehicles. The proposed development is predicted to add 110 trips in the morning peak (83 in and 27 out) and 121 trips in the evening peak (30 in and 91 out).

The TIA concluded the operation of the proposed development would not adversely impact the LoS at the assessed intersections and would remain unchanged from the LoS currently experienced. The TIA also concluded the proposed development would result in minor increases to the Degree of Saturation (DoS) and Average Vehicle Delay (AVD) at the three intersections, typically in the order of 0.001 to 0.013. This indicates the development will cause a minor increase in demand of the capacity of nearby intersections.

Neither the RMS nor TfNSW, raised concerns regarding operational traffic. The Department notes Council raised concerns regarding the assigned traffic trip generation rates, the existing DoS of 0.922 at the Campbelltown Road/Rose Payten Road intersection and potential traffic impacts of the proposal on industrial operations along Swaffham Road. A DoS of 1.0 would indicate intersection demand and capacity are equal and no further capacity at a junction is available.

The Department considers the trip generation rates used in the TIA are consistent with the RMS Guide and reflect the type and scale of the proposed development. The Department also considers

the increases in DoS from the development are negligible, considering the current DoS at the Campbelltown Road/Rose Payten Road intersection is already elevated.

The Department has reviewed the TIA in light of the predicted impacts of the proposed development during operation on the local road network and key nearby intersections. The Department is satisfied the proposed development would not adversely impact the local road network and existing road users. The Department has recommended conditions requiring the Applicant to construct internal road infrastructure in accordance with the relevant Australian Standards and prepare an operational traffic management plan.

Car Parking

The TIA assessed the parking requirements of the proposed development against the rates of the DCP and the RMS Guide. The Applicant has advised the proposal is anticipated to employ up to 400 people but has not provided information on the likely shift sizes and times. The proposed site layout includes 481 car parking spaces and nine accessible car parking spaces. This satisfies the car parking requirements of the RMS Guide and would ensure sufficient car parking is provided for staff during operation.

The proposed design also allows additional space for each warehouse reserved for future car parking, capable of providing up to 147 provisional parking spaces. This complies with the number of car parks required under the DCP. The Applicant has also advised the 80 parking spaces proposed in the north-east corner of the external storage area (Lot 3 DP 817793) is in addition to the proposed 481 and 147 provisional spaces. The Applicant seeks to reserve the area for parking but defer its construction for a future need.

Neither Council nor RMS raised any issues regarding car parking.

The Department has reviewed the TIA, predicted traffic impacts and proposed car parking provision. The Department's assessment concludes the proposed development would not generate any unreasonable traffic impacts over the traffic volumes currently experienced along Culverston Road and the surrounding road network on the local road network. The proposed 481 car parking spaces would provide sufficient car parking in the unlikely event all 400 employees are present on the site at the same time. Furthermore, as the current estate design provides sufficient car parking without the additional 80 spaces, the Department considers the Applicant's proposal to defer these car parks to a later date is reasonable. However, the Department notes the current site design provides flexibility to provide additional parking if required.

On this basis, the Department has recommended conditions of consent to manage traffic impacts of the proposed development, requiring the Applicant to:

- provide a minimum of 481 car parking spaces for the life of the development;
- manage construction and operational traffic in accordance with an approved Traffic Management Plan;
- prepare and implement a Workplace Travel Plan to reduce travel demand associated with private vehicles; and
- design and construct all car parking and internal road surfaces are in accordance with the relevant Australian Standards.

5.2. Flooding

The site is surrounded by existing open waterways and channels. The Applicant proposes to carry out bulk earthworks across the site and import 231,400 m³ of fill to create level building pads for the four warehouse buildings. This has the potential to affect stormwater and flood behaviour during significant rainfall events. The Applicant advised from previous discussions with Council that on-site detention would not be provided as the development is not anticipated to increase the area of impervious surfaces from the existing industrial use. Stormwater impacts are assessed in **Section 5.5**.

The EIS includes a flood report and concept stormwater plan which used Council's regional flood model to assess the on-site flooding impacts of the proposed development. The flood report assessed the 100-year Average Recurrence Interval (ARI) event at 21 locations around and within the site under two scenarios involving current site topography and site filling.

The assessment and revised modelling in the RTS concluded there would be no impact on adjoining properties in a 100 year ARI event and finished site levels would be above the 100 year ARI levels. However, during a Probable Maximum Flood (PMF) event, the site and Culverston Road would be inundated with high hazard flood flows potentially preventing site evacuation by vehicle and on foot. Warning times during a PMF event would be short (potentially 10 minutes) due to the extent of catchment urbanisation and short run-off times. Due to the short response times, on-site refuge is the only feasible option in extreme flood events. The Applicant intends to prepare a flood plan for the site detailing:

- on-site refuge facilities;
- methods to educate site users how to response and reach refuge facilities in extreme flood events; and
- collaboration with Council and the State Emergency Service (SES) in developing the flood plan.

Council noted the site is affected by 1 in 100 ARI flood events and requested all drainage modelling software used for the assessment be provided for assessment and the preparation of a stormwater management plan for minor and major storm events. The Applicant advised this information would be provided to Council following the completion of the detailed designs of the development.

The Department has reviewed the Applicant's flood assessment and addendum information provided in the RTS and is satisfied bulk earthworks, warehouse levels and the estate layout would ensure the site and surrounding properties would be unaffected during a 100 year ARI event. The Department notes the flooding outcome during a PMF event is partially driven by external factors to the proposed development including the existing high level of impervious surfaces in the catchment and high volumes of stormwater run-off.

The Department's assessment concludes adequate measures including on-site refuge facilities and flood evacuation plan are capable of managing worker safety during a PMF or extreme flood event. On this basis, the Department has recommended conditions of consent requiring the Applicant to:

- prepare a stormwater management plan in consultation with Council, including the provision of the modeling data to Council, to the satisfaction of the Secretary prior to the commencement of construction;
- prepare a flood emergency response plan prepared to the satisfaction of the Secretary in consultation with the Council and the SES; and
- submit work as executed drawings of stormwater infrastructure and refuges constructed on-site prior to the issue of any occupation certificate.

5.3. Contamination

Bulk earthworks and demolition associated with the proposed development have the potential to expose construction workers and future users to hydrocarbon impacted soil and groundwater identified on-site associated with previous uses on the site from three existing underground storage tanks (UST) (diesel, kerosene and unleaded petrol) and a stockpile. **Figure 13** shows the areas identified as potential sources of contamination across the site. The application seeks consent to remediate the contaminated soils on-site only.

SEPP 55 aims to provide a state-wide approach to the remediation of contaminated land and reduce the risk of harm to human health and the environment by specifying circumstances where consent is required for remediation. In accordance with clause 7 of SEPP 55, the application was accompanied by a detailed Phase 2 Investigation and a RAP.

Clause 7 of SEPP 55 prohibits a consent authority from determining an application unless it has considered whether the land is contaminated, and if it is, whether it can be made suitable for its proposed use. Further consideration of SEPP 55 is provided at **Appendix C. Managing Land Contamination: Planning Guidelines, SEPP 55, Remediation of Land** specifies where a consent authority may require the Applicant to engage an accredited EPA Site Auditor.



Figure 13: Locations of Interest On-Site

Site Investigations

The Applicant undertook soil and groundwater testing on-site to determine the extent of contamination. The assessment inferred groundwater flows from the south to the north through the site. The Phase 2 assessment identified elevated hydrocarbon levels in soil samples taken from the central portion of the site near existing petrol bowser, fuel storage and an on-site stockpile at MW4 and SB6 (see **Figure 14**). This contamination is located at the site of warehouse 1D. The assessment also identified the following elevated groundwater concentrations against the *National Environmental Protection (Assessment of Site Contamination) Measure 1999 (with amendment April 2013)* (NEPM) freshwater Groundwater Investigation Levels (GIL):

- **naphthalene**: within MW3 and MW4 near the fuel storage areas and pump infrastructure, which could present a risk to the nearest ecological receptor (Bow Bowing Creek). The extent of naphthalene contamination has not been delineated, however impacts were not identified in downgradient monitoring;
- **cadmium**: within MW2 and MW5 (minor exceedance), however no exceedance was recorded at MW4 which is slightly downgradient of MW5;
- **zinc**: within MW2, MW3, MW4 and MW5 above the freshwater GILs. Elevated zinc levels were reported up and down gradient of the site. Elevated zinc levels enter the groundwater from the south and east and were considered to be indicative of background conditions; and
- **nickel**: within MW4 and MW5, with a minor exceedance of the freshwater GILs (see **Figure 14**).

Groundwater exceedances were primarily confined to the central portion of the site.



Figure 14: Location of Groundwater Exceedances

Remedial Action Plan

As described in the RAP, The Applicant's preferred remediation of hydrocarbon impacted soils involves excavation and on-site treatment using landfarming / biopiling (landfarming). Landfarming is

a passive, biological, remediation approach using naturally occurring micro-organisms to remove, attenuate or transform polluting or contaminating substances in soils (including hydrocarbons). Following the removal of the aboveground storage tanks, fuel lines and related fuel infrastructure, excavation of contaminated soil is anticipated to extend 0.5 m below ground level with the extent of remediation proposed to be governed by visual observations by an environmental consultant. Samples of excavated soil would be field tested with a portable photo-ionisation detector (PID) for the presence of volatile petroleum hydrocarbon contamination.

Excavated contaminated soils would be remediated on-site in accordance with the EPA's *Best Practice Note: Landfarming*. Soils will be excavated and spread into a thin layer on a prepared above ground surface within the site, with stormwater diverted around the area and connected to a leachate collection system. Aerobic microbial activity is then stimulated in batches by aeration and/or the addition of moisture and nutrients. Following excavation of the contaminated soils, the area would be validated with further testing and then back filled with the remediated soil. The Applicant has advised this approach is efficient, can be undertaken on an ex-situ location on-site and will maximise the re-use of materials on-site, by using treated soils during the bulk earthworks phase of construction.

The Applicant does not intend to remediate contaminated groundwater on-site as it considers this contamination is confined to the central portion of the site, is not migrating off-site and presents a low risk to the receiving environment. Instead, the Applicant proposes to manage contaminated groundwater during construction as part of a CEMP. The Applicant's preferred management measures include preventing impacted groundwater from discharging into Bow Bowing Creek. Groundwater which accumulates within excavations near the fuel storage tanks would be pumped out and disposed at a licensed liquid waste facility or disposed to the Sydney Water sewer network as Trade Waste, subject to the agreement for necessary pre-treatment.

The EPA raised no concern regarding the proposed remediation method for hydrocarbon impacted soils. However, the EPA recommended the Applicant obtain a Site Audit Statement (SAS) Section B to determine if the proposed RAP can remediate the site. As detailed in **Section 4.3**, the Applicant has not provided a SAS Section B.

The Department notes the revised RAP submitted with the supplementary RTS includes measures to manage contaminated groundwater during construction, but does not delineate the extent of contaminated groundwater identified to the east of SB6 (see **Figure 15**). Furthermore, the RAP concluded the elevated naphthalene levels in the groundwater did not present a risk to the current or proposed uses of the site.

The Department has reviewed the information provided, including the detailed site investigation, revised RAP and the EPA's comments. The Department is satisfied the Applicant's proposed remediation approach for contaminated soils is acceptable, subject to the implementation of a RAP, endorsed by an appointed Site Auditor, prior to the commencement of construction, with the exception of the infrastructure and hardstand demolition required to access the area of environmental concern and warehouses 1A, 1B and 1C.

With respect to groundwater contamination, the Department is satisfied the extent of contaminated groundwater is confined to the central portion of the site and agrees the risk for off-site migration of contaminated groundwater is low.

The Department is also satisfied with the Applicant's proposed construction management measures but considers water that pools within the UST excavations should be disposed of at a licensed liquid waste facility, rather than as Trade Waste. The Department considers this approach, in conjunction with the Unexpected Finds Protocol, will provide sufficient measures to allow the Applicant to construct warehouses 1A, 1B and 1C while completing the soil remediation works. On this basis, the Department considers the RAP is capable of remediating the site and managing contaminated groundwater during construction.

To ensure the contamination identified at the site is remediated and managed appropriately, and the site is suitable for its intended land use, the Department has recommended conditions of consent requiring the Applicant to:

- engage an accredited Site Auditor prior to the commencement of construction or remediation works;

- remediate the site in accordance with the RAP endorsed by the appointed Site Auditor, prior to the commencement of construction of warehouse 1D, with the exception of the required demolition works and construction of warehouses 1A, 1B and 1C;
- ensure no contaminated groundwater encountered on-site enters Bow Bowing Creek or any other off-site water way;
- submit a Site Audit Report and SAS Section A prepared by an EPA accredited Site Auditor once the remediation works are complete which demonstrates the site has been remediated and is suitable for the proposed industrial/commercial use;
- implement an Unexpected Finds Protocol to address asbestos or asbestos containing materials associated with underground Endeavour Energy electricity network infrastructure;
- dispose of the water that pools within the areas of UST excavations and neighbouring areas appropriately in accordance with the *Protection of the Environment Operations (Waste) Regulation 2014*; and
- implement an unexpected finds protocol in the event additional areas of contamination are identified during construction.

On this basis, the Department's assessment concludes the proposed approach to remediate the site and manage the identified contamination is suitable.



Figure 15: Proposed RAP Area

5.4. Clause 4.6 Variation to Height of Buildings Standard

Clause 4.3 of the *Campbelltown Local Environmental Plan 2015* (CLEP) specifies that buildings are not to exceed the heights nominated in the Height of Buildings map specified in the CLEP. The height limit for the subject site is 12 m. The proposed development consists of four warehouse buildings each with a maximum height of 13.7 m. This is 1.7 m (14.17%) above the CLEP height limit. The additional height is a small part of the overall bulk of each warehouse building, consisting of roof pitch and ridgelines. Existing structures on and around the site are up to 12 m high.

Clause 4.6(3) of the CLEP allows variations to development standards subject to an Applicant:

- providing a written request justifying how compliance with the development standard is unnecessary or unreasonable; and
- demonstrating there are sufficient environmental planning grounds to justify the contravention of the standard.

The EIS includes a written request to vary the height limit applicable to the site. In considering a variation under clause 4.6(4), the consent authority must be satisfied:

- the Applicant's written request has adequately addressed the matters under clause 4.6(3) of the CLEP; and
- the proposed development will be in the public interest because it is consistent with the objectives of the relevant standard and the objectives for development within the zone in which the development is located.

The Applicant argues compliance with the development standard is unreasonable or unnecessary given the desired industrial character of the area and the comparability of the proposed warehouse buildings.

Clause 4.6(4)(b) requires the concurrence of the Secretary, however as provided by clause 79B(2A) of the EP&A Act (see **Section 3** of this report), SSD (including this application) is exempt from requiring the Secretary's concurrence.

Council did not object or raise any concerns regarding the Applicant's requested variation.

The Department has considered the Applicant's written request and concludes the proposed variation to the height of the warehouse buildings is acceptable on the basis that:

- a building height of 13.7 m is consistent with the height of standard warehouses before additional fire safety measures must be added, as required by the National Construction Code;
- the proposed variation satisfies the objectives of the height of buildings development standard and the IN1 - General Industrial zone as it:
 - would provide four new warehouse buildings with the potential to cater to diverse tenants to store and distribute fast moving consumer goods;
 - provide additional employment opportunities within the Minto area;
 - minimise adverse impacts on industry and nearby land uses by integrating with the industrial character of the locality;
 - support and protect industrial land for industrial uses by rejuvenating an existing brownfield industrial site;
 - would establish a warehousing and logistics hub with a height and scale compatible with existing industrial land uses; and
 - would provide a range of compatible industrial uses within an established industrial area with access to the regional road network and in proximity to the freight rail network;
- the portion of the warehouse buildings above the height limit is small relative to the overall size of the buildings, which relates to the warehouse ridgeline;
- existing industrial buildings, road and rail infrastructure would screen the proposed warehouse buildings from nearby residential properties and the increase in building height is unlikely to be perceived from the closes residential areas of Woodbine and Leumeah;
- the proposed internal and perimeter landscape treatments would mitigate the visual impacts of the proposed development; and
- the proposed development incorporates appropriate building setbacks to mitigate the perception of the increased height including 25.8 m from the northern boundary (warehouse 1B), 45 m from the eastern boundary along Culverston Road, 30 m from Rose Payten Drive (warehouse 1A) and 15 m from Airds Road to the west.

On this basis, the Department supports the proposed variation to the height control subject to the implementation of the proposed landscaping treatments and has recommended conditions of consent to ensure they are implemented consistent with Council's requirements. The Department is therefore satisfied of the matters in clause 4.6(4) of the CLEP.

5.5. Other Issues

The Department's assessment of other issues is provided in **Table 3**.

Table 3: Assessment of Other Issues

Consideration	Recommended Conditions
Noise and Vibration	
<ul style="list-style-type: none"> The EIS included a Noise and Vibration Impact Assessment (NVIA) which assessed the noise impacts of the development from construction and operational in accordance with the <i>Interim Construction Noise Guideline</i> (ICNG) and the <i>Industrial Noise Policy</i> (INP). The nearest residential receiver is located approximately 300 m to the west at Woodbine. Noise generated during construction would be from demolition, earthworks, installation of site infrastructure and erection of warehouse buildings. Construction works would take 36 months to complete. Given the distance to existing residential properties and noise from existing industrial operations, the Main Southern Railway and the nearby roads, the risk of construction noise impacts during standard construction hours is low. While the Applicant has assessed OoHW for construction, no details of specific hours, scope or duration for works have been provided. As the scope of OoHW are unknown, the Department considers further information should be submitted to the Secretary, prior to undertaking the works, should the Applicant seek to undertake OoHW. Operational noise sources include internal truck and vehicle movements and idling and on-site use of plant and equipment. The Applicant seeks to operate the development 24 hours/day, seven days/week. The NVIA established intrusive noise criteria (most stringent) as the project specific noise level (PSNL) in accordance with the INP for receivers at Woodbine to the west and Leumeah to the east. The NVIA concluded the development would comply with the PSNLs at all identified residential receivers at all times during operation. The EPA and Council did not raise any issues regarding noise impacts. The Department's assessment concludes the development would not result in any unacceptable construction or operational noise impacts, subject to the Applicant implementing best management practices and operating the proposed development in accordance with the PSNLs in the NVIA. The Department has therefore recommended noise limits reflecting the PSNLs and conditions requiring the Applicant to implement best practice noise management techniques as part of a CEMP and requirements in the event the Applicant seeks to undertake construction activities outside of standard construction hours. 	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> implement best practice noise management; prepare and submit a CEMP to the satisfaction of the Secretary prior to the commencement of construction; submit requests to the satisfaction of the Secretary, if OoHW are requested, before undertaking the works; and comply with the recommended operational noise limits.
Stormwater	
<ul style="list-style-type: none"> The EIS included a stormwater assessment and MUSIC model to assess the stormwater quality of the proposed development. 95% of the site is covered by impervious surfaces consisting of hardstand (which experience extensive traffic movements) and roofed areas. The remaining 5% consists of landscaped areas. The Applicant intends to re-use existing drainage connections where possible, and would maintain general sub-catchment flows and existing discharge points where connections are upgraded or demolished. Gross pollutant traps (GPTs) with oil/grit separators would be installed at stormwater discharge points from the site to treat stormwater run-off. The stormwater assessment concluded by replacing significant hardstand areas with roofed areas (with lower hydrocarbon pollutant loads) and installing GPTs, the proposed development would improve stormwater quality for: <ul style="list-style-type: none"> gross pollutants (90 % reduction); total suspended solids (65 % reduction); total phosphorus (35 % reduction); and total nitrogen (10 % reduction). The assessment also concluded the site water balance between current and 	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> implement best practice management; implement the recommendations of the stormwater assessment in the EIS as part of an approved SMP; and provide all drainage modelling to Council as part of preparing the SMP for the detailed design process.

Consideration	Recommended Conditions
<p>proposed uses would remain mostly unchanged and no mitigation measures are proposed.</p> <ul style="list-style-type: none"> • Council and DPI raised no concerns regarding stormwater. • DPI advised construction dewatering may require a license. • As detailed in Section 5.2, Council requested the Applicant to submit any modelling data for assessment. The Applicant advised this information would be provided following the detailed design of the development. • Considering the existing site conditions, the Department is satisfied the proposed development will improve stormwater quality by reducing hydrocarbon loads from run-off. • The Department also considers the total volume of stormwater run-off is unlikely to significantly change as a result of the proposed development, and existing discharge points can manage any potential changes to stormwater flow paths from the proposed warehouse buildings. • The Department's assessment concludes the stormwater impacts of the proposed development would be minimal considering its existing, highly modified industrial use. The Department has recommended conditions requiring the Applicant to prepare and implement a stormwater management plan (SMP) consistent with the recommendations (further fill, level and drainage analysis) of the stormwater assessment, including all drainage modelling, in consultation with Council. 	
Air Quality and Odour	
<ul style="list-style-type: none"> • The EIS included an Air Quality Impact Assessment (AQIA) to determine the air quality and odour impacts of the proposed development during construction and operation. • The AQIA concluded emissions from construction would be from demolition, vegetation clearing, bulk earthworks and site preparation. • Air emissions during operation would be from exhaust emissions from light and heavy vehicles moving to, from and within the site. • The assessment concluded the risk of adverse air quality impacts from construction and operation of the development is low and recommended mitigation measures including minimising site disturbance, keeping exposed surfaces wet, stabilising/revegetation disturbed areas, notifying nearby sensitive receivers and ensuring trucks are covered. • Council and the EPA raised no issues regarding air quality and odour. • The Department's assessment of the AQIA concludes air quality impacts during construction and operation (with the implementation of the proposed mitigation measures) will be negligible. • To ensure air quality levels are managed appropriately, the Department has recommended conditions requiring the Applicant to submit a staging plan of demolition, earthworks and building construction to ensure exposed areas are managed, prepare and implement a CEMP and implement dust minimisation measures. 	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> • submit a staging plan detailing pavement demolition, bulk earthworks and construction across the site; • implement best practice management practices to prevent and minimise dust emissions from activities during construction and operation; and • prepare and implement a CEMP.
Waste	
<ul style="list-style-type: none"> • The EIS included an assessment of predicted waste streams during the construction and operational phases and the measures to avoid, minimise, reduce or re-use waste generated by the proposed development. • construction waste would consist of general construction waste (concrete, asphalt, timber), packaging, food and green waste. • operational waste would consist of putrescible general solid waste. • The EPA advised the proposed development would not require an EPL and did not recommend any conditions of consent. • The Department has reviewed the waste assessment and concludes the proposed measures (classification, sorting, stock pile management, waste minimisation and recycling opportunities) would adequately manage waste streams generated during construction and operational phases as part of the sites CEMP and operational environmental management plan (OEMP). • The Department has therefore recommended conditions requiring the Applicant to classify all waste streams and to incorporate the measures proposed in the EIS into a CEMP and OEMP for the development. 	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> • classify all waste streams in accordance with the EPA's <i>Waste Classification Guidelines</i>; and • ensure all waste generated by the development is disposed to lawful waste facilities.
Visual Amenity and Landscaping	
<ul style="list-style-type: none"> • The EIS included an assessment of visual amenity including perspectives of the site with the proposed warehouse buildings, container storage and landscaping. 	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> • implement landscaping works in accordance with an

Consideration	Recommended Conditions
<ul style="list-style-type: none"> The proposed development is located in an industrial area and existing industrial buildings to the east and west would screen the development from residential areas. Building setbacks of 30 m to the main southern railway and external storage area and internal and perimeter landscaping with mature heights up to 25 m and a 2.4 m high palisade fence would also help screen the warehouses. Council requested outdoor storage areas be screened; stored materials to be stacked no higher than the proposed screening measures; and container stacks to be limited to two containers high from the existing ground level. Council also noted the landscape plans did not show the required fence setback of 3 m. The Department agrees the development should incorporate screening measures and the container stack heights be limited to mitigate visual impacts. The Department has reviewed the Applicant's proposed landscaping treatments and is satisfied they would screen the development and the external storage area from nearby public vantage points, including Rose Payten Drive and the Main Southern Railway. On this basis, the Department has recommended conditions requiring the Applicant to prepare a Landscape Management Plan (LMP), prior to the commencement of construction and ensure container stacks on the external storage area are no more than two containers high. 	<p>approved Landscape Management Plan;</p> <ul style="list-style-type: none"> submit revised landscape plans showing the palisade fencing set back from the site boundary; and limit the height of container stacks on the external hardstand to a maximum of two containers.
Signage	
<ul style="list-style-type: none"> The EIS includes an assessment against SEPP 64 and a signage strategy detailing proposed estate, building identification and directional signage within the site. The application seeks to install four estate signs. Each estate sign would be 5 m high. Each directional sign would be 3 m high. As tenants of the buildings are yet to be confirmed, details of signage on the façade of the four warehouse buildings are unknown. The proposed signage is consistent with the definition of business and building identification signage under SEPP 64. On this basis, pursuant to clause 9 of the SEPP, Part 3 - Advertisements of SEPP 64 does not apply to the signage in this SSD application. The Department's assessment of the proposed signage against Schedule 1 of SEPP 64 (see Appendix C) concludes it complies with the requirements and aims of SEPP 64. To ensure additional building façade signage complies with SEPP 64, the Department has recommended conditions requiring the Applicant to submit detailed warehouse façade signage plans to the Secretary, prior to installation. 	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> erect signage in accordance with the specifications identified in Appendix 1 of the RTS; and submit detailed façade signage plans for each warehouse prior to the installation of façade signage to the satisfaction of the Secretary.
Soils and Water	
<ul style="list-style-type: none"> The EIS includes a geotechnical assessment including subsurface and groundwater conditions. The assessment of identified on-site contamination is discussed in Section 5.3 of this report. The assessment concluded the characteristics of soil and historical fill present on-site consists of: <ul style="list-style-type: none"> topsoil in two longitudinal stockpiles along Culverston Road made up of existing fill material with medium plasticity silty clay, clay and sandy clay characteristics; and alluvial material comprised high plasticity grey and brown clay associated with the former creek which passed through the site. The assessment encountered groundwater between 4.4 to 6.3 m below the ground surface level and recommended surface flows be diverted away from open excavations. The assessment also recommended further investigations (boreholes, test pits and laboratory testing) for ground conditions on-site to inform the detailed design of warehouse foundations. The Applicant intends to implement standard erosion and sediment control measures during construction in accordance with <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom 2004) (the Blue Book). The Department has recommended conditions requiring the Applicant to implement and maintain soil management practices in accordance with the Blue Book. 	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> prepare and submit a Stormwater Management Plan; and implement best practice erosion and sediment control measures.

Consideration	Recommended Conditions
Infrastructure Servicing	
<ul style="list-style-type: none"> The EIS includes an Infrastructure Report to determine the infrastructure servicing requirements for the proposed development. The assessment concluded the proposed development will require upgrades to the site's electricity supply from Endeavour Energy. The assessment also concluded additional water and sewer connections may be required to service the proposed warehouse buildings. The Department has reviewed the Applicant's assessment and is satisfied the proposed development can be serviced, subject to additional service connections and upgrades. The Department has recommended conditions requiring the Applicant to obtain further relevant approvals as required and prepare a dilapidation report to ensure the condition of surrounding public infrastructure is maintained. 	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> obtain relevant additional approvals from regulatory bodies; and prepare and submit a dilapidation report prior to the issue of the first Construction Certificate.
Aboriginal Cultural Heritage	
<ul style="list-style-type: none"> The EIS included an Aboriginal Heritage Impact Assessment, which included a desktop AHIMs search, site inspection and analysis of geotechnical survey results to determine the potential impact on Aboriginal cultural heritage. The AHIMs search identified several artefacts in the surrounding area, however no registered Aboriginal sites are located within the study area and no new Aboriginal objects or sites were identified by the search. The site investigation and geotechnical analysis concluded the site and its surroundings are highly disturbed by previous earthworks and construction and alluvium associated with the original landform and historical alignment of Bow Bowing Creek may be highly disturbed. The Applicant has advised earthworks will not impact the site to the depths where alluvium was encountered. OEH advised it has made a decision not to provide comments on Aboriginal cultural heritage on the proposed development. The Department's assessment concludes the risk of adverse impacts to areas of potential Aboriginal significance from the proposed development is low, considering the highly modified industrial nature of the site. To ensure any unexpected items or sites encountered during construction are managed appropriately, the Department has recommended a condition of consent requiring the Applicant to stop works in the event Aboriginal objects are uncovered during construction. 	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> stop works and contact the OEH in the event Aboriginal objects are encountered during construction.
Historic Heritage	
<ul style="list-style-type: none"> The EIS included a Statement of Heritage Impact, prepared by Artefact Heritage to assess potential impacts on non-Aboriginal Heritage. The assessment identified two statutory heritage items consisting of the Hollylea and former Plough Inn and Milestone XXXI. These items are located 450 m to the southwest and 300 m west of the site, respectively. No identified heritage items are located within the site. The assessment also noted the site was used for farming in the early twentieth century, but does not exhibit evidence of any permanent or temporary structures until its development to its current state in the 1980s. The assessment concluded the site has low historical archaeological potential and that the proposed development would have no direct or indirect impact on the identified heritage items due to the distances between the site and the identified heritage items. The Department's assessment concludes any potential impacts on the identified historic heritage items are negligible and no conditions of consent with regards to historic heritage are necessary. 	<p>Due to the distance and location of the identified items from the site the Department considers no conditions for impacts to non-aboriginal cultural heritage are necessary.</p>
Contributions	
<ul style="list-style-type: none"> Campbelltown Council's <i>Section 94A Development Contributions Plan</i> applies to the development. The Department has recommended conditions of consent to ensure the Applicant pays its Section 94A contribution in accordance with Council's Section 94A plan and policy, prior to the issue of any Occupation Certificate. 	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> pay development contributions in accordance with the Section 94A plan prior to the issue of any Occupation Certificate.

6. CONCLUSION

The Department's assessment of the SSD application has fully considered all relevant matters under Section 79C of the EP&A Act, the objects of the EP&A Act and the principles of ecologically sustainable development.

The Department's assessment concludes there will be minimal amenity impacts during construction and operation of the development, such as traffic, contamination and remediation, visual and noise impacts, subject to the implementation of the recommended conditions, including:

- the preparation and implementation of construction and operational management plans;
- engaging an EPA site Auditor and the implementation of an endorsed RAP to remediate contamination identified on-site;
- obtaining a Site Audit Statement Section A to verify the site is made suitable for the intended industrial/commercial uses;
- operational noise limits to mitigate impacts on residential receivers;
- landscaping across the site to screen the proposed development;
- limiting the stack heights of containers for the external hardstand storage area; and
- payment of Section 94A development contributions to Council.

The Development represents an investment of over \$141 million and would generate additional employment opportunities in the Minto area, consisting of up to 300 jobs during construction and 300 to 400 jobs during operation. The proposal would also strengthen an existing industrial area in the Campbelltown LGA with access to the regional road network. Consideration of the Applicant's clause 4.6 variation would facilitate the height of the proposed warehouse buildings on-site.

The Department concludes the impacts of the development can be appropriately managed through implementation of the recommended conditions of consent. Consequently, the Department considers the development is in the public interest and should be approved, subject to conditions.

7. RECOMMENDATION

It is recommended the Executive Director, Key Sites and Industry Assessments:

- **consider** the findings and recommendations of this report;
- **consider** the Applicant's written request seeking to justify the departure of the height standard in clause 4.3 of the *Campbelltown Local Environmental Plan 2015*;
- **be satisfied** of the matters in clause 4.6(4)(a) of the *Campbelltown Local Environmental Plan 2015* to vary that height standard;
- **approve** the development application under Section 89E of the *Environmental Planning and Assessment Act 1979*; and
- **sign** the attached development consent (refer **Appendix A**).

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APPENDIX A: DEVELOPMENT CONSENT

The Instrument of Development Consent can be viewed on the Department's website at:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=7500

APPENDIX B: CONSIDERATIONS UNDER SECTION 79C

Section 79C of the EP&A Act requires that the consent authority, when determining a development application, must take into consideration the following matters:

<p>(a) the provisions of:</p> <ul style="list-style-type: none"> (i) any environmental planning instrument, and (ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Director-General has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and (iii) any development control plan, and (iiia) any planning agreement that has been entered into under Section 93F, or any draft planning agreement that a developer has offered to enter into under Section 93F, and (iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph), and (v) any coastal zone management plan (within the meaning of the <i>Coastal Protection Act 1979</i>) that apply to the land to which the development application relates. 	<p>Detailed consideration of the provisions of all environmental planning instruments (including draft instruments subject to public consultation under this Act) that apply to the proposed development is provided in Appendix C of this report.</p> <p>Under Clause 11 of the SRD SEPP DCPs do not apply to SSD.</p> <p>The Applicant has not entered into any planning agreement under Section 93F.</p> <p>The Department has undertaken its assessment of the proposed development in accordance with all relevant matters as prescribed by the regulations, the findings of which are contained within this report.</p> <p>The site is not located within a coastal zone and no coastal zone management plan applies to the development.</p>
<p>(b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,</p>	<p>The Department has considered the likely impacts of the development in detail in Section 5 of this report. The Department concludes all environmental impacts can be appropriately managed and mitigated through the recommended conditions of consent.</p>
<p>(c) the suitability of the site for the development,</p>	<p>The development is a warehouse and logistics hub located on IN1 – General Industrial zoned land which is permissible with development consent. The site is surrounded by existing industrial uses and is currently occupied by an existing car servicing operation.</p>
<p>(d) any submissions made in accordance with this Act or the regulations,</p>	<p>All matters raised in submissions have been summarised in Section 4 of this report and given due consideration as part of the assessment of the proposed development in Section 5 of this report.</p>
<p>(e) the public interest.</p>	<p>The development would generate up to 300 jobs during construction and 300 to 400 jobs during operation. The development is a considerable capital investment in the Campbelltown area and would contribute to the provision of local jobs.</p> <p>The environmental impacts of the development would be appropriately managed via the recommended conditions. On balance, the Department considers the development is in the public interest.</p>

APPENDIX C: CONSIDERATION OF ENVIRONMENTAL PLANNING INSTRUMENTS

State Environmental Planning Policy (State and Regional Development) 2011

The SRD SEPP identifies certain classes of development as SSD. In particular, construction and operation of warehouses and distribution centres that meets the criteria in Clause 12 of the SRD SEPP is classified as State significant development. The development satisfies the criteria in Clause 12 of the SRD SEPP as it involves the construction and operation of a warehousing and logistics hub with a CIV over \$50 million.

State Environmental Planning Policy (Infrastructure) 2007 (ISEPP)

The ISEPP aims to facilitate the effective delivery of infrastructure across the State and lists the type of development defined as Traffic Generating Development.

The development constitutes traffic generating development in accordance with the ISEPP as it involves the construction and operation on an industry of more than 20,000 m² in area. Consequently, it requires referral to RMS for comment and consideration of accessibility and traffic impacts.

The development was referred to RMS for consideration. The RMS raised no objection to the proposed development and did not recommend any conditions of consent. The proposed development is therefore considered consistent with the ISEPP.

State Environmental Planning Policy 33 – Hazardous and Offensive Development (SEPP 33)

SEPP 33 outlines the items a consent authority must consider to assess whether a development is hazardous or offensive.

The Applicant reviewed the development in accordance with SEPP 33 and advised the development would not store dangerous goods above the threshold limits specified in SEPP 33, therefore it would not be considered potentially hazardous or offensive development. The Department has recommended conditions of consent to ensure the storage of any goods remains below the SEPP 33 thresholds.

State Environmental Planning Policy 55 – Remediation of Land (SEPP 55)

SEPP 55 aims to ensure potential contamination issues are considered in the determination of a development application. The Department's assessment of identified on-site contamination is at **Section 5.3** of this report. The Department has recommended specific conditions of consent requiring the Applicant to implement the RAP and obtain a SAS Section A to ensure the site has been made fit for its intended purpose.

State Environmental Planning Policy No. 64 – Advertising and Signage (SEPP 64)

SEPP 64 aims to ensure outdoor signage visible from a public place is compatible with the desired amenity and visual character of an area, is of high quality design and finishes and provides effective communication in suitable locations.

The Applicant has submitted a signage strategy detailing the dimensions, location and number of building identification and estate wayfinding signage. Approval for individual warehouse façade signage (tenant specific) would be sought separately prior to its installation. While SEPP 64 applies to the development, Part 3 of SEPP 64 does not apply as the signage consists of business and building identification signs as defined under clause 9 of SEPP 64.

The Department has assessed the proposed signage in **Table 4** below. The Department's assessment concludes the proposed signage complies with the requirements of SEPP 64 and would not detract from the surrounding locality, would provide suitable wayfinding and direction within the site and will be consistent with the aims and objectives of SEPP 64. However, as tenant specific signage is unknown, the Department has recommended a condition of consent requiring the Applicant to submit details of warehouse façade signage to the satisfaction of the Secretary, prior to its installation.

Table 4: Assessment against SEPP 64 Criteria

Criteria	Compliance
<i>Character of the Area</i>	
Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located?	Yes. The signage will be adjacent to an existing industrial area containing signage for business identification.
Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?	Yes. The signage is consistent throughout the development site.
<i>Special Areas</i>	
Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas?	No. The site and signage is removed from any special area.
<i>Views and vistas</i>	
Does the proposal obscure or compromise important views?	No. The signage would not obstruct important views.
Does the proposal dominate the skyline and reduce the quality of vistas?	No. The site will not dominate the skyline.
Does the proposal respect the viewing rights of other advertisers?	Yes. The signage will not obstruct any other existing signage.
<i>Streetscape, setting and landscape</i>	
Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?	Yes. The signage is of an acceptable scale to allow navigation and identification within the development site.
Does the proposal contribute to the visual interest of the streetscape, setting or landscape?	Yes. The signage will allow site users to efficiently navigate the site.
Does the proposal reduce clutter by rationalising and simplifying existing advertising?	Yes. The number of signs are limited to those required for easy navigation and identification on-site.
Does the proposal screen unsightliness?	The Applicant has advised the signage will not be used as a screen or filter.
Does the proposal protrude above buildings, structures or tree canopies in the area or locality?	The signage is located below roof levels and would not enter the skyline.
Does the proposal require ongoing vegetation management?	No. The signage will be located separately from vegetated areas.
<i>Site and building</i>	
Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located?	Yes. The signage is compatible with the scale and industrial character of the site and area.
Does the proposal respect important features of the site or building, or both?	Yes. The signage will remain below the roof lines of the warehouses.
Does the proposal show innovation and imagination in its relationship to the site or building, or both?	The signage is located to clearly identify future tenants and would reflect its industrial context.
<i>Associated devices and logos with advertisements and advertising structures</i>	
Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed?	Appropriate lighting will be provided to illuminate the estate signage.
<i>Illumination</i>	
Would illumination result in unacceptable glare?	The Applicant has advised signage would be designed to avoid unacceptable glare.
Would illumination affect safety for pedestrians, vehicles or aircraft?	No. Signage would be designed in a way to not interfere with pedestrians and vehicles.
Would illumination detract from the amenity of any residence or other form of accommodation?	The site and signage is removed from any nearby residential receiver.
Is the illumination subject to a curfew?	No curfew is proposed for the signage.
Can the intensity of the illumination be adjusted, if necessary?	Intensity of sign illumination would be adjusted via replacement bulb wattage.
<i>Safety</i>	
Would the proposal reduce the safety for any public road?	The signage will not be positioned to cause any hazard for any road.
Would the proposal reduce the safety for pedestrians or bicyclists?	The signs would not impact pedestrian or cyclist safety.
Would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas?	The signage will not obstruct pedestrian sight lines.

Campbelltown Local Environmental Plan 2015 (CLEP)

The CLEP aims to encourage the development of housing, employment, infrastructure and community services to meet the needs of the existing and future residents of the Campbelltown LGA. The CLEP also aims to conserve and protect natural resources and foster economic, environmental and social well-being.

The proposed development is located on IN1 - General Industrial zoned land on an existing brownfield industrial site, surrounded by existing industrial uses. The proposed development is consistent with the objectives of the IN1 - General Industrial zoning in the CLEP.

The Department has assessed the proposed development with regard to the relevant development standards of the CLEP. These are:

- 4.1 - Minimum subdivision lot size;
- 4.3 - Height of buildings; and
- 7.3 - Flood planning.

The Department has consulted with Campbelltown City Council throughout the assessment process and has considered all relevant provisions of the CLEP and those matters raised by Council in its assessment of the development (see **Section 5**). The Department notes the application does not seek to subdivide the site. The Department's assessment of the Applicant's request to vary the height development standard under clause 4.6 of the CLEP from 12 m to 13.7 m and flooding impacts are also detailed in **Section 5**. The Department concludes the development is consistent with the relevant provisions of CLEP.

Campbelltown (Sustainable City) Development Control Plan 2015

Notwithstanding that clause 11 of the SRD SEPP states DCPs do not apply to SSD, **Table 5** below details the consistency of the proposed development against relevant the Campbelltown (Sustainable City) Development Control Plan 2015.

Table 5: DCP Compliance

DCP Control	Compliance
Offices shall not comprise more than 30% of the gross floor area of the respective unit.	Yes. Offices comprise less than 30 % of each warehouse GFA.
Building Setbacks Industrial development shall be setback by: <ul style="list-style-type: none"> • 30 m to the Main Southern Railway and Rose Payten Drive; • 15 m to Airds Road to the north; • 11 m to Airds Road to the west where adjoining Bow Bowing Creek where the boundary is 58 m from the road reserve; and • 10 m to any other road. 	Yes. The proposal incorporates setbacks which comply with the DCP controls as detailed in Section 5.4 of this report.
Fencing Industrial fencing shall be a maximum of 2.4 m high.	Yes. The Applicant's proposed fencing is 2.4 m high of palisade design and set back from the property boundary.
Car Parking Car parking should be provided in accordance with the following rates: <ul style="list-style-type: none"> • 1 space for every 100 m² for the first 2,000 m² GFA and 1 space per 250 m² for all floor space exceeding than 2,000 m² GFA. • 1 space for every 35 m² for all office and ancillary GFA. 	Yes (provisional). The Department's assessment of car parking is at Section 5.1 of this report. The current design has space to provide 147 provisional car parks, which when provided would comply with the DCP.
Landscaping Landscaping shall be provided to a minimum depth of 50% of the following required setback area located: <ul style="list-style-type: none"> • along the full width of each street frontage (other than vehicle driveways); and • along the full width of setbacks from adjoining open space, residential and/or commercial areas. The first 3 m of all required street front landscaped area (as measured from the street boundary) shall be planted of advanced canopy trees that are: <ul style="list-style-type: none"> • a minimum of 2 m in height with a minimum 400 litre pot size at the time of planting; 	Yes. The proposed development incorporates landscaping in accordance with the DCP including deep soil plantings. The Department's assessment is at Section 5.5 of this report.

<ul style="list-style-type: none">• of native species; and• planted /placed every 10 m. <p>Side boundary landscaping of a minimum of one (1) metre width shall be provided between the street boundary and the building line.</p>	
Subdivision	N/A. No subdivision is proposed.

APPENDIX D: ENVIRONMENTAL IMPACT STATEMENT

See link: http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=7500

APPENDIX E: SUBMISSIONS

See link: http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=7500

APPENDIX F: RESPONSE TO SUBMISSIONS

See link: http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=7500