

WILLOW TREE PLANNING

September 2018



Environmental Impact Statement

Proposed Warehouse and Distribution Facility

Lot 7, 585-649 Mamre Road, Orchard Hills (Snack Brands)

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SECTION 4.12 CERTIFICATE

Declaration Form **Submission of Environmental Impact Statement (EIS)**
prepared under the *Environmental Planning and Assessment Act 1979 – Part 4, Division 4.3, Section 4.12*

EIS Prepared By

Name Travis Lythall

Qualifications Bachelor of Science, UoN

Address Suite 4, Level 7
100 Walker Street
North Sydney, NSW, 2060

In Respect Of Proposed Warehouse and Distribution Facility

Development Application

Applicant Name Stephen O'Connor (Altis Property Partners)

Address Level 14, 60 Castlereagh Street, Sydney, NSW, 2000

Land to be Developed Lot 7, 585-649 Mamre Road, Orchard Hills:

- Lot 2171 in Deposited Plan 1153854

EIS An Environmental Impact Statement (EIS) is attached.

Certificate I certify that I have prepared the contents of this EIS and to the best of my knowledge:

- it is in accordance with Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*,
- contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure to which the statement relates, and
- that the information contained in the statement is neither false nor misleading.

Signature



Name **Travis Lythall**
Qualification BSc, UoN
Date 19 July 2018

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GLOSSARY OF KEY TERMS

TERM	MEANING
<i>Altis Property Partners</i>	Altis Property Partners Pty Ltd
<i>AU\$</i>	Australian Dollars
<i>Council</i>	Penrith City Council
<i>DP&E</i>	Department of Planning and Environment
<i>EIS</i>	Environmental Impact Statement
<i>EP&A Act</i>	<i>Environmental Planning and Assessment Act 1979</i> (as amended)
<i>EP&A Regulation</i>	<i>Environmental Planning and Assessment Regulation 2000</i>
<i>NSW 2021</i>	<i>NSW 2021: A Plan to Make NSW Number One</i>
<i>OEH</i>	NSW Office of Environment and Heritage
<i>SEARs</i>	Secretary's Environmental Assessment Requirements issued 20 June 2018
<i>SEPP</i>	State Environmental Planning Policy
<i>The Site / Subject Site</i>	Lot 7, 585-649 Mamre Road, Orchard Hills (Lot 2171 in Deposited Plan 1153854)
<i>Snack Brands</i>	Snack Brands Australia
<i>Sqm or m²</i>	Square metres
<i>SREP</i>	Sydney Regional Environmental Plan
<i>SSD</i>	State Significant Development
<i>Willowtree Planning</i>	Willowtree Planning Pty Ltd

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EXECUTIVE SUMMARY

This Environmental Impact Statement (EIS) has been prepared by Willowtree Planning Pty Ltd (Willowtree Planning) on behalf of Altis Property Partners Pty Ltd (Altis Property Partners). The proposed development seeks consent for the construction and operational use of a Warehouse and Distribution Facility on the identified land portion – Lot 7, 585-649 Mamre Road, Orchard Hills (the Site). The proposed Warehouse and Distribution Facility would also include an internal estate road, ancillary hardstand, amenities and office space, all of which would be constructed to support the use and associated infrastructure and civils works required across the Site. The proposed works across the Site would be conducted in a staged manner to provide a suitable platform for development.

The Site is owned by Altis Property Partners and is currently used for industrial-related purposes. The Site forms part of the Western Sydney Employment Area (WSEA), which can be described as designated land, ultimately providing businesses in the immediate vicinity and wider region with land uses concerning industry and employment, encompassing areas for transport, logistics, warehousing and office space. The Site is located within the southern portion of the Mamre West Precinct known as First Estate, which is affiliated with a proponent led rezoning proposal that was finalised in June 2016 (with associated planning controls – Mamre West Precinct Development Control Plan). The rezoning proposal saw the Mamre West Precinct be rezoned to General Industrial (IN1), allowing for the delivery of land suitable for employment-generating purposes, in particular warehousing and distribution / industrial-related development. This identified rezoning proposal was undertaken at no cost to the NSW Government, ensuring that the timely delivery of land for employment-generating purposes could be promoted and implemented accordingly.

The proposed development is consistent with surrounding land uses to which *State Environmental Planning Policy (Western Sydney Employment Area) 2009* (SEPP WSEA) applies; and, would contribute to the efficient use of employment lands for warehousing and distribution purposes. It is noted that the bulk earthworks, estate infrastructure, and site access have been dealt with under previous State Significant Development (SSD) Application(s) – 'SSD 7173', 'SSD 7173 MOD 1' & 'SSD 7173 MOD 2' – previously assessed and determined by the NSW Department of Planning & Environment (DP&E).

Under Schedule 1, Part 12 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP), the process of applying for and the categorisation of a proposal to be considered as SSD, requires that the Capital Investment Value (CIV) be greater than AU\$50 Million, concerning proposals regarding Warehouses or Distribution Centres. The proposed development is considered SSD, for which it would be lodged to and determined by the NSW DP&E. Under the *Environmental Planning and Assessment Act 1979* (EP&A Act) it is required that a formal request for Secretary's Environmental Assessment Requirements (SEARs) be made prior to lodgement of an application seeking formal approval. SEARs were requested for the proposed development (Reference: SSD 9429) and subsequently issued by the NSW DP&E on 2 August 2018 (refer to **Appendix 1**).

In addition to the general requirements with regard to the proposed development, the SEARs outlined a number of Key Issues to be addressed as part of the EIS, including:

- Strategic Context;
- Urban Design and Visual;
- Suitability of the Site;
- Community and Stakeholder Engagement;
- Soils and Water;
- Traffic and Transport;
- Noise and Vibration;
- Waste;

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- Air Quality;
- Hazards and Risks;
- Bushfire and Incident Management;
- Biodiversity; and,
- Socio-Economic.

Accordingly, the findings of this EIS identify that the proposed development could be accommodated without generating impacts that are considered unacceptable by the relevant legislation. Furthermore, the proposed Warehouse and Distribution Facility would be consistent with the objectives outlined in SEPP WSEA.

Based on the findings of this EIS, the proposed development supports warehousing and distribution, providing further employment-generating opportunities in the immediate local communities, as-well-as to the wider locale of Western Sydney.

The proposed development is suitable for the local context and would not result in any significant environmental impacts. As such, it is recommended that the proposed development be supported by the NSW DP&E.

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PART A PRELIMINARY

1.1 INTRODUCTION

This EIS has been prepared by Willowtree Planning on behalf of the Proponent, Altis Property Partners, and is submitted to the NSW DP&E in support of the proposed development on the land portion described as Lot 7, 585-649 Mamre Road, Orchard Hills (Lot 2171 in DP 1153854), for the purpose of a Warehouse and Distribution Facility.

This SSD Application seeks consent for the construction and operational use of a proposed Warehouse and Distribution Facility that would play a vital role in the storage and distribution of goods for Snack Brands Australia (Snack Brands) and would contribute to the enhanced promotion of creating employment-generating opportunities. The proposed development is summarised below as follows:

- Construction of a proposed Warehouse and Distribution Facility – Lot 7, 585-649 Mamre Road, Orchard Hills, which would operate 24/7 without limitation, given formal approval is provided. The proposed Warehouse and Distribution Facility would include the following:
 - Office Areas – Ground Floor
 - Air lock / entrance area;
 - Waste facilities;
 - Amenities include end of trip facilities;
 - First Aid Room;
 - Vertical transportation;
 - Breakout area; and,
 - Dispatch Office.
 - First Floor
 - Open Plan office space with 41 workstations;
 - Five (5) large meeting rooms;
 - Data Room;
 - Store Rooms;
 - Amenities; and,
 - Commercial kitchen and storage area.
 - Distribution Facility
 - Staging areas for receiving and dispatch;
 - ASRS;
 - Packaging areas;
 - RORO Docks;
 - Selective racking;
 - High Speed Sorting Transfer Vehicle area; and,
 - Battery Charge area.
 - External
 - Hardstand;
 - On-Grade Docks;
 - Recessed Docks;
 - Truck Entry and Exit;
 - Landscaping;
 - Stormwater and services;
 - Service zones;
 - Carparking; and,
 - Gate house.

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First Estate is currently owned by Altis Property Partners and is used for industrial-related purposes. The ongoing operational use of First Estate, namely, the Site would be for the purpose of a Warehouse and Distribution Facility operated by Snack Brands.

As discussed throughout this EIS, the proposed development seeks to establish an innovative operation that would benefit Snack Brands on a national, state, regional and local scale, as-well-as benefiting the immediate community and wider locale through the enhanced promotion of employment opportunities.

This EIS describes the Site and proposed development; provides relevant background information; responds to the SEAR; and, assesses the proposed development in terms of the relevant matters set out in relevant legislation, Environmental Planning Instruments (EPIs) and associated planning policies.

The structure of this EIS is as follows:

- **Part A Preliminary**
- **Part B Site Analysis**
- **Part C Proposed Development**
- **Part D Legislative and Policy Framework**
- **Part E Consultation**
- **Part F Environmental Risk Assessment**
- **Part G Management and Mitigation Measures**
- **Part H Project Development Justification**
- **Part I Conclusion**

1.2 PROJECT TEAM

The Project Team involved in the preparation of this SSD Application include:

- Altis Property Partners (Proponent)
- Willowtree Planning (Planning Consultant)
- HB+B Property (Project Manager)
- Nettleton Tribe (Architectural Plans)
- Geoscapes + Nettleton Tribe (Landscape Architectural Plans)
- Geoscapes (Landscape Design)
- Geoscapes (Landscape and Visual Impact Assessment)
- Sparks + Partners (Civil Engineering and WSUD Strategy)
- Ason Group (Traffic Impact Assessment)
- Acoustic Logic (Noise Impact Assessment)
- SLR (Air Quality)
- Mckenzie Group (Building Code of Australia)
- Peterson Bushfire (Bushfire Assessment)
- Wood & Grieve Engineers (Ecologically Sustainable Development)

1.3 THE PROPONENT

The proponent is Altis Property Partners. See **Table 1** for contact details.

Table 1: Proponent Contact Details	
Contact Name	Stephen O'Connor (Altis Property Partners) George Henien (HB+B Property)
Company Details	Altis Property Partners c/o HB+B Property
Contact Number	0419 535 103

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1.4 CAPITAL INVESTMENT VALUE

The CIV of the proposed development is estimated at AU\$59,859,000.00 (excluding GST) subject to final costing and tender clarifications (**Appendix 2**).

1.5 EXISTING ZONING PROVISIONS

The Site is currently zoned General Industrial (IN1) under the provisions of SEPP WSEA.

1.6 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

Prior to obtaining the SEARs, a meeting was held with the NSW DP&E to discuss the proposed development and to confirm that the SEARs could be issued accordingly. In response to the meeting held, a formal request for SEARs was submitted (Reference: SSD 9429). The SEARs were subsequently issued on 2 August 2018.

The SEARs issued are annexed as **Appendix 1**. An overview of how the requirements have been satisfied within this EIS is outlined in **Section 5.1**. This document is also consistent with the minimum requirements for Environmental Impact Statements in Clauses 6 and 7 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation).

PART B SITE ANALYSIS

2.1 SITE LOCATION & EXISTING SITE CHARACTERISTICS

The Site is legally defined as 585-649 Mamre Road, Orchard Hills (Lot 2171 in DP 1153854). The proposed Warehouse and Distribution Facility is to be located within Lot 7 of First Estate. Existing attributes of the Site are noted as follows:

- In total, the development site area of 585-649 Mamre Road, Orchard Hills (First Estate) equates to 48.35 hectares, with direct frontage to Mamre Road of 890 metres;
- The proposed development site area of Lot 7, 585-649 Mamre Road, Orchard Hills equates to 50,302 m²;
- South Creek bounds the Site to the west via its meandering tributary;
- The Site has previously undergone extensive earthworks as part of SSD 7173, which were approved by the Minister for Planning;
- Located opposite the Site, to the east is Erskine Business Park, which contains various warehouse / logistics and industrial facilities that operate on a 24/7 basis including CEVA Logistics, CSR, Woolworths and Alvaro Transport. Note, that some of these facilities are high-bay warehouses;
- Located 2 km to the south-east is Mamre Anglican School, Emmaus Catholic College and the Catholic Healthcare retirement living community;
- To the north along Mamre Road is the residential suburb of St Clair, that comprises typical residential dwelling, interspersed with pockets of open space;
- Located to the south-west is Twin Creeks Golf Club and Country Club, and further to the south the SCA Pipeline, while to the west are rural residential land holdings; and,
- Access is readily available to the regional road network, including the M4 & M7 Motorways, which confirms the suitability of the Site for the proposed and intended purposes.

An aerial photograph and cadastral image of the Site further illustrating the Site characteristics is provided below in **Figures 1 & 2**. **Figures 3 - 7** depict the Site from ground level from varied directional perspectives.

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Figure 1 Existing Development & Subject Site (NearMaps, 2018)

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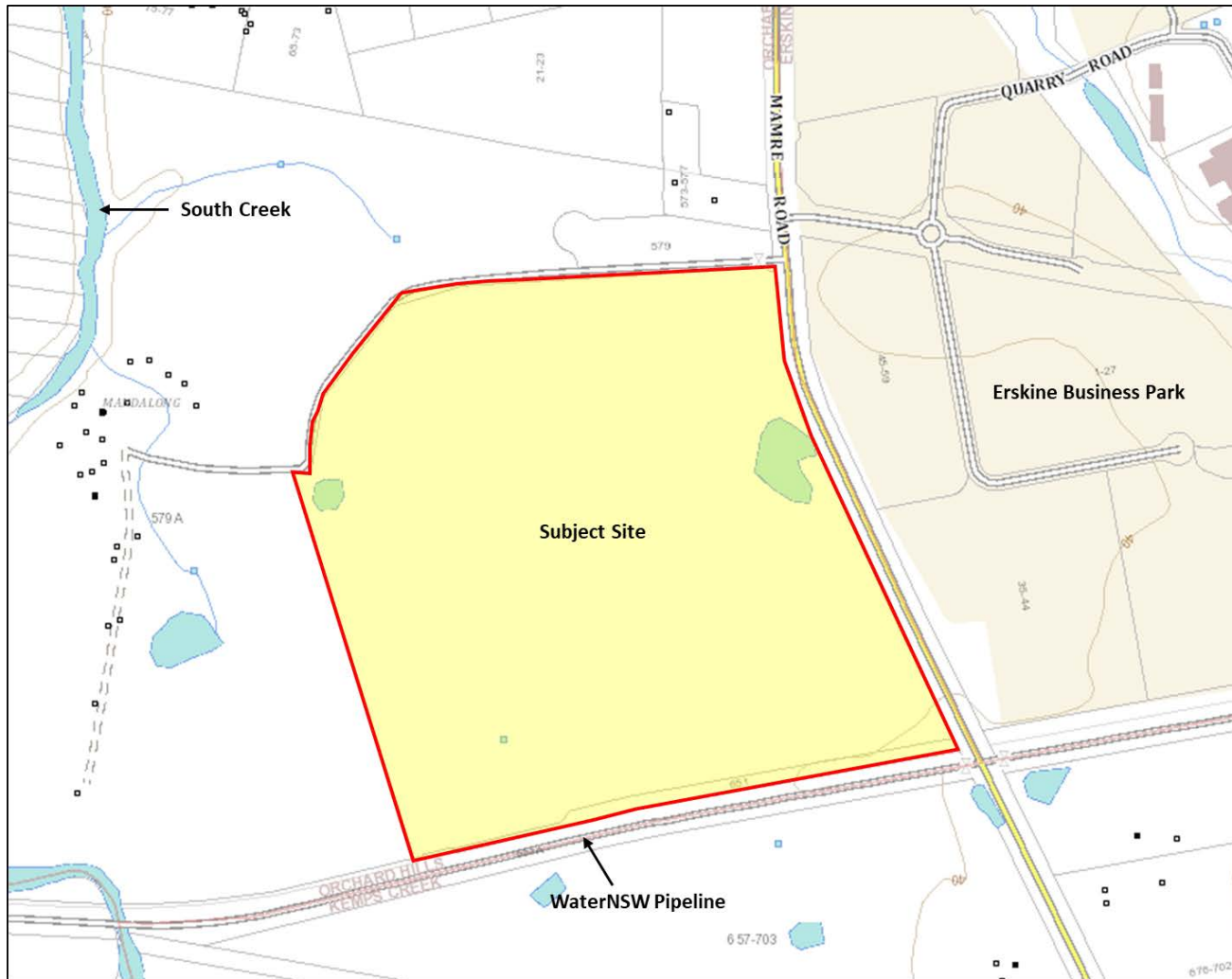


Figure 2 Cadastral Image of Subject Site and Surrounding Context (SIXMaps, 2018)

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Figure 3 South Western Perspective of Lot 7, 585-649 Mamre Road, Orchard Hills (Phone Camera, 2018)

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Figure 4 North Western Perspective of Lot 7, 585-649 Mamre Road, Orchard Hills (Phone Camera, 2018)

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Figure 5 North Eastern Perspective of Lot 7, 585-649 Mamre Road, Orchard Hills (Phone Camera, 2018)

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Figure 6 South Eastern Perspective of Lot 7, 585-649 Mamre Road, Orchard Hills (Phone Camera, 2018)

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Figure 7 Southern Perspective of Lot 7, 585-649 Mamre Road, Orchard Hills (Phone Camera, 2018

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2.2 LAND OWNERSHIP

The land which is the subject of this SSD Application is under ownership of Altis Property Partners (ABN 33 132 761 338).

2.3 STRATEGIC CONTEXT

The Site is included within 'Precinct 11 – Western Sydney Employment Area' (refer to **Figure 3**) under the provisions of SEPP WSEA and is zoned under this Environmental Planning Instrument (EPI) (refer to **Figure 4**). The proposed Warehouse and Distribution Facility responds accordingly as it seeks to provide employment-generating development opportunities that would ultimately contribute to the overall growth and development of the Western Sydney Region.

In addition to the above, the Site is identified within the Western City District Plan. The Productivity Priorities identified under the Plan are:

- *Planning Priority W7 – Establishing the land use and transport structure to deliver a liveable, productive and sustainable Western Parkland City;*
- *Planning Priority W8 – Leveraging industry opportunities from the Western Sydney Airport and Badgerys Creek Aerotropolis;*
- *Planning Priority W9 – Growing and strengthening the metropolitan cluster;*
- *Planning Priority W10 – Maximising freight and logistics opportunities and planning and managing industrial and urban services land; and,*
- *Planning Priority W11 – Growing investment, business opportunities and jobs in strategic centres.*

The proposed development is considered consistent with and responsive to the above priorities, making a valuable contribution to the Western Parkland City, which is earmarked for development and higher and better uses with regard to the Site.

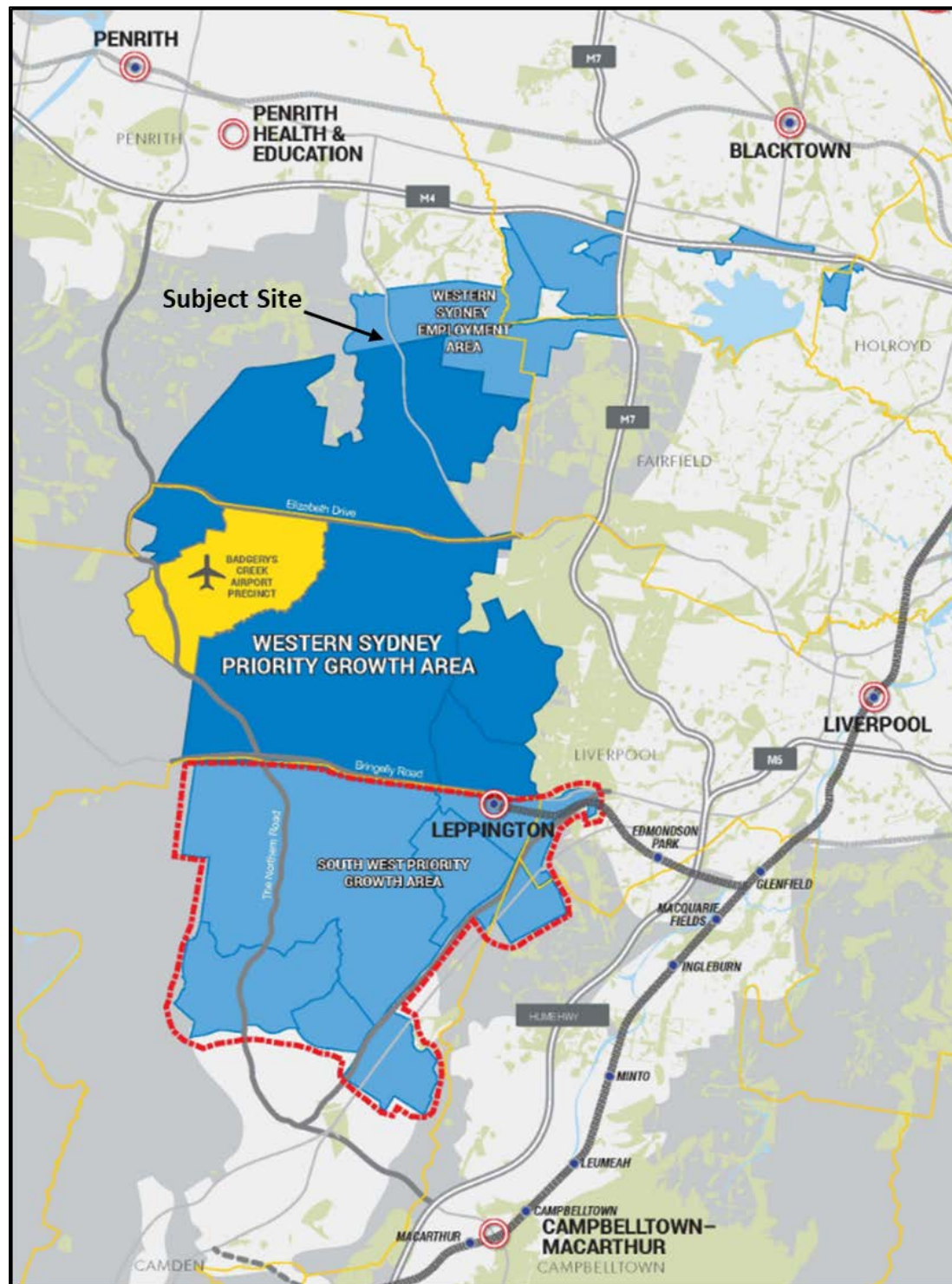


Figure 8 Western Sydney Employment Area & Subject Site (NSW DP&E, 2018)

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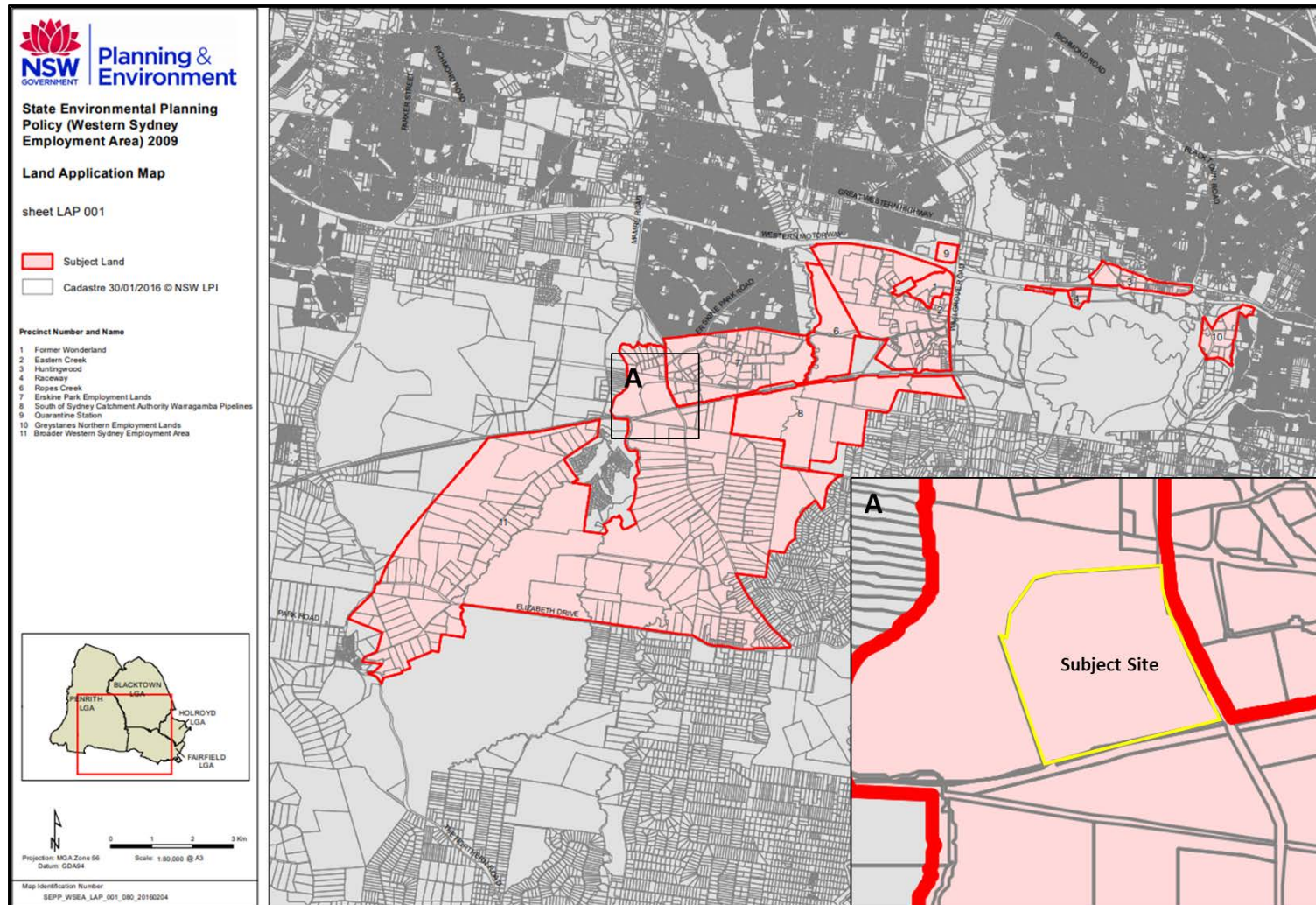


Figure 9 Land Application Under *State Environmental Planning Policy (Western Sydney Employment Area) 2009* (NSW Legislation, 2018)

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2.4 DEVELOPMENT AND PLANNING HISTORY

On 15 December 2016, the Minister for Planning granted approval to SSD 7173 for the construction and operation of a Warehouse and Logistics Hub at 585-649 Mamre Road, Orchard Hills. The proposal has since been formally modified a total of two (2) times. The proposal as approved under SSD 7173 MOD 2, includes the following approved development particulars with regard to SSD 7173 (refer to **Table 2**).

Table 2: Proposed Development Particulars – SSD 7173 MOD 2	
Project Element	Development Particular
Site Area	- 48.35ha
Warehouse/Office	<ul style="list-style-type: none">- Lot 8A: 21,725 m² GFA; and, 85 parking spaces (including 1 accessible parking space)- Lot 8B1: 7,425 m² GFA; and, 60 parking spaces (including 1 accessible parking space)- Lot 8B2: 12,319 m² GFA; 57 parking spaces.
Building Height	13.7m
Primary Land Use	Warehousing and distribution (24/7 use).
Bulk Earthworks	<ul style="list-style-type: none">- Bulk earthworks have been carried out to establish building pads on the estate allotments as-well-as balance through cut/fill volumes.- These works were carried out in a staged manner upon issue of development approval. The establishment of building pads provided flexibility for the design of future facilities as consent for the building footprints was sought under SSD 7173.- Construction of a bio-retention basin was implemented within the lower topography area of the Site (north-west) to provide stormwater detention and quality treatment for the estate.
Internal Estate Road	<ul style="list-style-type: none">- The internal estate road services all allotments within the estate and has since been constructed via a staged approach according to the order in which the allotments were and are being developed.- The design of the road was constructed in accordance with Penrith City Council requirements, achieving a road reserve width of 20.6 metres and affording a dual carriageway capable of accommodating B-Doubles.- Access to Precinct 1 off the estate road is provided via the construction of the necessary vehicle crossing which was shown on the engineering drawings submitted with the application.
External intersection works	<ul style="list-style-type: none">- An interim signal intersection between Mamre Road and the proposed industrial access road – designed and constructed in accordance with Austroads and RMS requirements – (as part of SSD 7173) provides access until completion of, and connection to, the Primary Access intersection (located to the north).
Infrastructure and Services	<ul style="list-style-type: none">- Services to the site are able to be provided from Mamre Road to the site, including water, electricity, sewer and communications.
Subdivision	<ul style="list-style-type: none">- Torrens Title subdivision of the Site was proposed to create allotments within First Estate. The subdivision would be managed under a Community Title Scheme to manage and operate the estate stormwater basin and associated

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	infrastructure.
Operational & Construction Jobs	<ul style="list-style-type: none">- Upon completion of the development, it is anticipated that Stage 1 will generate in the order of 220 operational jobs.- Construction jobs generated by the stage 1 works is expected to be in the order of 447 given the extensive civil works required in addition to the construction of the facilities.

To date, warehouse facilities 8B1 and 8B2 have been constructed and are operational, while the bulk earthworks and estate road have also been completed. Built form is yet to be constructed on Lot 7 or Lot 8A. The proposed Warehouse and Distribution Facility, which is the subject of this Report would be constructed on Lot 7 in lieu of that approved under SSD 7173.

Development consent has also been previously obtained separately from Penrith City Council for the construction of a Warehouse and Distribution Facility on Lot 3, which is operated by DATS. Fire and Rescue obtained approval under Part 5 of the EP&A Act for the construction and operation of their training facility on Lot 2. Both facilities on Lot 2 and Lot 3 are constructed and are operational.

Furthermore, three (3) separate Development Applications have recently been submitted to Penrith City Council for determination. Additionally, two (2) Modification Applications have also been subsequently lodged to the NSW DP&E for assessment (refer to **Table 3**).

Table 3: Previous Development & Modification Applications at 585-649 Mamre Road, Orchard Hills			
DA Reference	Development Description	Lodged	Determination
DA18/0628	Proposed Warehouse and Distribution Facilities on proposed Lots 6A and 6B.	26 June 2018	Yet to be Determined.
DA18/0674	Proposed paper subdivision concerning 579a Mamre Road, Orchard Hills regarding the proposed subdivision of one (1) lot into two (2) separate allotments.	11 July 2018	Yet to be Determined.
DA18/0689	Proposed Warehouse and Distribution Facility on proposed Lot 6C.	16 July 2018	Yet to be Determined.
SSD Mod 18_9453 (SSD 7173)	Proposed channel realignment and proposed Lot 5 expansion works.	29 June 2018	Yet to be Determined.
SSD Mod 18_9479 (SSD 7173)	Two (2) proposed Warehouse and Distribution Facilities on proposed Lot 8A.	13 July 2018	Yet to be Determined.

2.5 SITE SUITABILITY

The proposed development would provide for a Warehouse and Distribution Facility in a location that is suitably located from any sensitive receiving environments. As previously discussed, the Site provides an unconstrained platform for development. The topography does not pose significant restrictions for future proposed development, and the Site has not been identified with any levels of contamination.

In summary, the suitability of the Site can be attributed to the following:

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- SEPP WSEA allows for the proposed development as a permissible use;
- Access to the regional road network;
- Compatibility with surrounding development and local context;
- Minimal impact on the environment; and
- Implementation of suitable mitigation measures where required.

PART C PROPOSED DEVELOPMENT

3.1 OBJECTIVES OF THE PROPOSAL

The aim of the proposed development is to provide a Warehouse and Distribution Facility that is facilitated by applicable objectives, including:

- Has appropriate access;
- Provides a viable economic return;
- Is compatible with surrounding developments and the local context;
- Would result in an employment-generating development;
- Would result in minimal impact on the environment; and,
- Would allow for the implementation of suitable mitigation measures where required.

3.2 DESCRIPTION OF THE PROPOSAL

3.2.1 Warehouse and Distribution Facility

Consent is sought to develop the Site for the purpose of a Warehouse and Distribution Facility. Operational use of the facility would be for warehousing and distribution purposes on a 24-hour, 7-day basis, consistent with surrounding operations.

The proposed development particulars are outlined in **Table 4** as follows:

Table 4: Proposed Development Particulars	
Project Element	Development Particular
Site Area	- 50,302 m ² (Lot 7)
Warehouse / Ancillary Office	- Low Bay Warehouse 18,630 m ² ; - High Bay Warehouse 11,025 m ² ; - Office 500 m ² ; and, - Dock Office 100 m ² .
Car Parking	- Cars Required (RMS): 114; and, - Cars Provided: 114
Building Height	- Low Bay Warehouse 13.7 m; and, - High Bay Warehouse 36.0 m (pertaining to 37% of the facility – 11,025 m ²).
Primary Land Use	- The proposed development involves a Warehouse and Distribution Facility for Snack Brands to store and distribute palletised goods to consumers throughout Australia. - Given the large scale and extent of goods to be stored and distributed, Snack Brands are proposing a portion of the development to be high bay (inclusive of high-density racking ASRS technology, which will allow for the efficient and automated operation of 37% of the proposed facility. - By enabling a land use of this stature (inclusive of the proposed equipment), it would allow goods to be stored much higher than standard racking in low bay warehouses; therefore, achieving the operational and spatial efficiencies intended and required.
Bulk Earthworks	- Minor earthworks are required to the existing pad to accommodate the proposed facility. - Bulk earthworks approved under SSD 7173 provide for the overall building pad on which the development is to be located.
Stormwater	- Stormwater would be collected and disposed of to the estate detention basin approved under SSD 7173.

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Internal Estate Road	- Access to the Site off the proposed estate road would be provided by the constructed access road (20.6 m wide) – as displayed in the architectural design.
Infrastructure and Services	- Services are available to the Site as approved under SSD 7173.
Subdivision	- No subdivision is proposed.
Operational & Construction Jobs	- Construction jobs are anticipated to be in the order of approximately 300, while operational jobs are expected to be in the order of 87.
Hours of Operation	- 24/7 operational basis.

The proposed development site plan is illustrated further in **Figure 5**.

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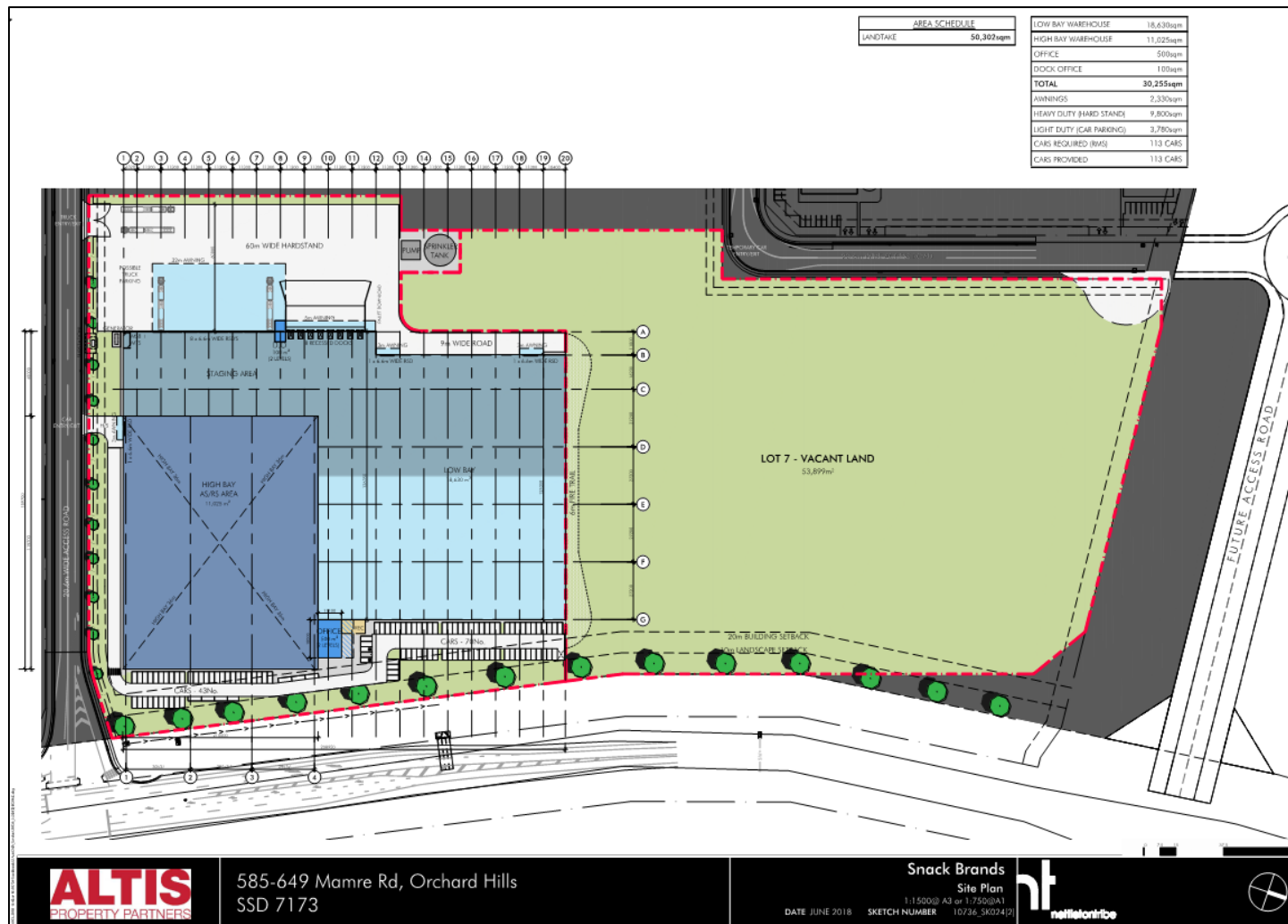


Figure 10 Proposed Development Site Plan (Nettleton Tribe, 2018)

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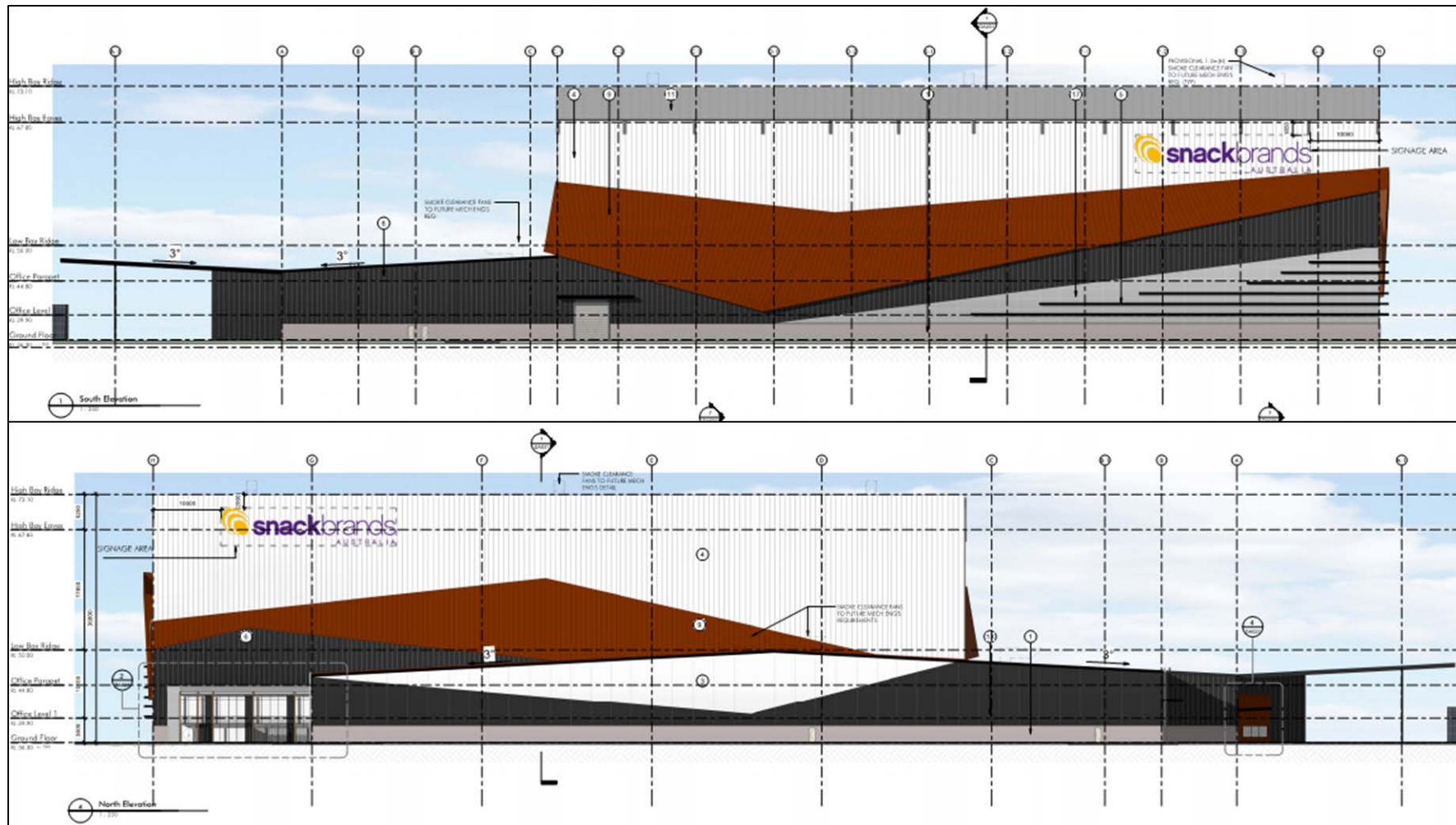


Figure 11 North Elevation (Bottom) & South Elevation (Top) of Subject Site (Nettleton Tribe, 2018)

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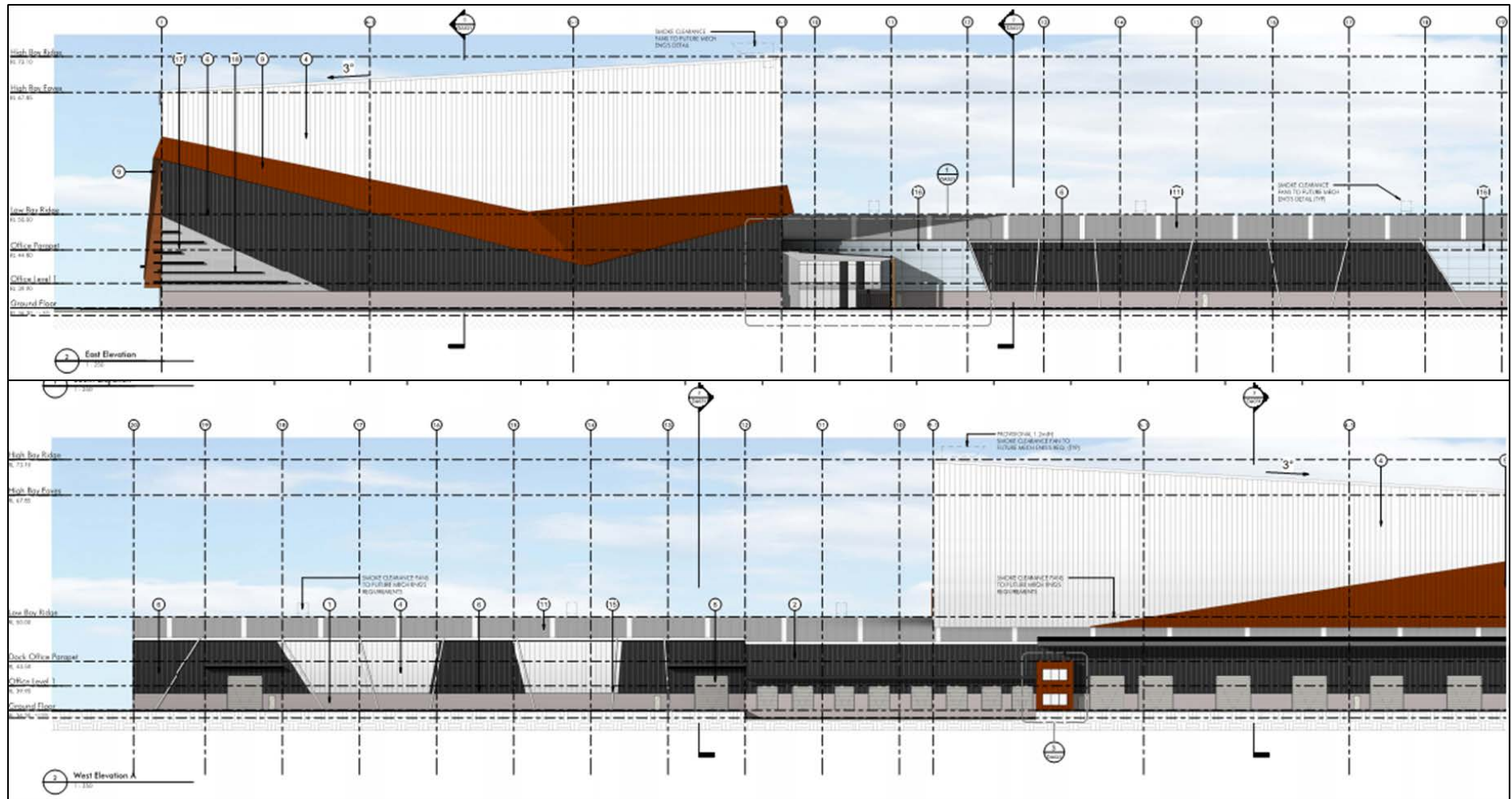


Figure 12 West Elevation (Bottom) & East Elevation (Top) of Subject Site (Nettleton Tribe, 2018)

3.2.2 Site Preparation

Earthworks are proposed across the site to facilitate development of the allotments (refer to **Appendix 9**). Cut to fill works are required on-site to facilitate the development. The proposed building finished floor level (FFL), pavement grading and finished levels aim to provide a relatively balanced cut to fill for the development minimizing the need import material and negate the use of retaining walls. A concept bulk earthwork(s) cut to fill plan had been prepared to demonstrate the depths of cut to fill required for the development, which range between 1.0 m of cut and 1.2 m of fill. Detailed analysis is provided of the cut and fill is shown in **Figure 13** below and **Table 5**. The total quantum of cut/fill is proposed as follows:

Table 5: Cut/Fill Balance	
Topsoil Volume	
0 m ³ (topsoil was removed pursuant to approved SSD 7173)	
Earthworks Volume	
Cut	9,570 m ³
Fill	9,570 m ³
Balance	0 m ³

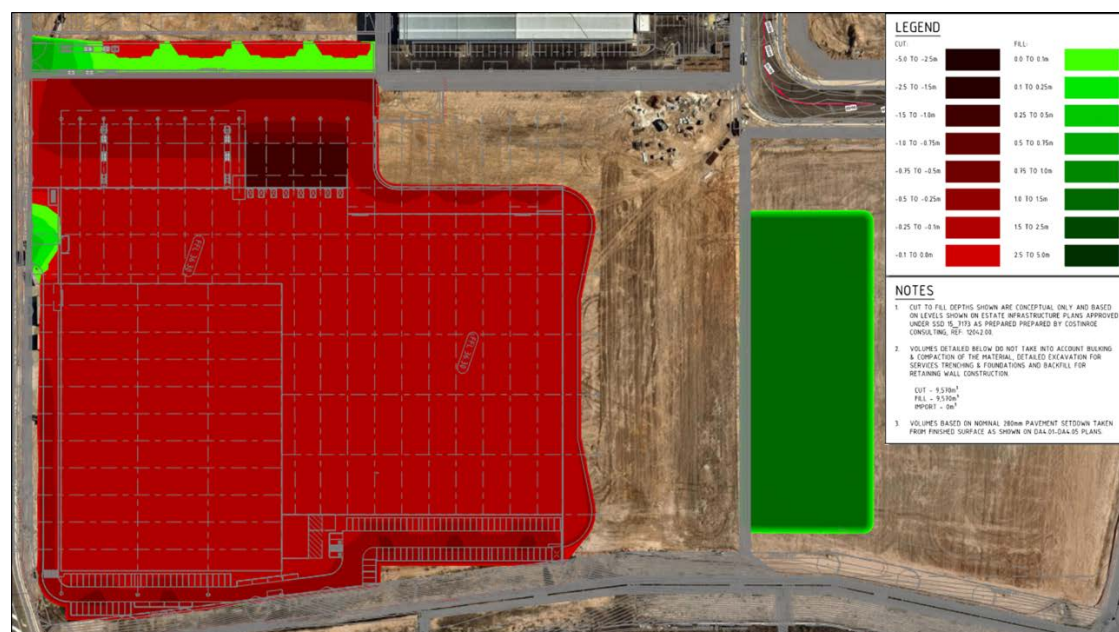


Figure 13 Proposed Earthworks Plan (Sparks + Partners, 2018)

3.2.3 Dangerous Goods

No Dangerous Goods are proposed to be stored on-site which trigger the thresholds of *State Environmental Planning Policy No 33 – Hazardous and Offensive Development* (SEPP 33). Should the proposed development ever require the need to store Dangerous Goods on-site, a SEPP 33 assessment would be conducted, and any recommendations and approvals required (if any) would be adhered to accordingly.

3.2.4 Project Documentation

Documents provided in support of the proposal are outlined in **Table 6**.

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Table 6: Document Schedule and Consultant Team

Appendix No.	Description	Author
Appendix 1	Secretary's Environmental Assessment Requirements	NSW DP&E
Appendix 2	Pre-DA (Pre-SEARs) Meeting Minutes	Willowtree Planning
Appendix 3	Quantity Surveyors Report	WT Partnership
Appendix 4	Subdivision Plan	Land Partners
Appendix 5	Survey Plan	Boxall
Appendix 6	Architectural Plans	Nettleton Tribe
Appendix 7	Landscape Plan	Geoscapes + Nettleton Tribe
Appendix 8	Landscape Design Report	Geoscapes
Appendix 9	Landscape and Visual Impact Assessment Report	Geoscapes
Appendix 10	Civil Plans and Water Sensitive Urban Design Report	Sparks + Partners
Appendix 11	Traffic Impact Assessment	Ason Group
Appendix 12	Air Quality & Odour Assessment	SLR
Appendix 13	Noise Impact Assessment	Acoustic Logic
Appendix 14	Ecologically Sustainable Development	Wood & Grieve Engineers
Appendix 15	Waste Management Plan Report	Willowtree Planning
Appendix 16	Bushfire Report	Peterson Bushfire
Appendix 17	Building Code of Australia Report	Mckenzie Group
Appendix 18	Consultation Letters	Willowtree Planning
Appendix 19	Architectural Design Statement	Nettleton Tribe
Appendix 20	Operational Flow Diagram / Plan	Nettleton Tribe / Snack Brands
Appendix 21	Automated Storage and Retrieval System	Daifuku

3.3 PROJECT NEED

In response to the operational needs of the future tenants (Snack Brands), it has been determined that a proposed Warehouse and Distribution Facility is required to accommodate its increased need for warehousing and distribution space. The proposed development is considered necessary to improve the operational efficiencies of transport and logistics (warehouse and distribution facilities) businesses within NSW and facilitate their future growth. **Section 3.5** below demonstrates the finer details and justifications surrounding Snack Brands selection of the Subject Site, particularly the requirement for a proposed high-bay warehouse, which would ultimately service the operation of the proposed development.

3.4 CONSIDERATION OF ALTERNATIVES

The purpose of the proposed development is to provide a Warehouse and Distribution Facility for Snack Brands, which would serve as their central Distribution Centre in NSW. It is considered that the proposed development:

- Allows for the development that is consistent with the aims of SEPP WSEA;
- Has appropriate access to the regional road network;
- Is compatible with surrounding development and the local context;
- Would generate employment opportunities, thus contributing to the growth of Western Sydney;
- Would result in minimal impact on the environment; and,
- Would allow for the implementation of suitable mitigation measures where required.

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The Site is considered to be appropriate for the proposed development as it allows for warehousing and distribution in an emerging precinct (First Estate) dominated by such development. The Site design and layout of the built form seeks to maintain consistency with the objectives of SEPP WSEA and enhance the underlying character intended for the locality. This would be achieved by the resultant built form, which reinforces the nature of the land use and is sensitive to the surrounding environment.

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

(a) 'Do Nothing' Scenario

This option was dismissed as the proposed development objectives, including the objective of facilitating an employment-generating development would not be met. If the proposed development was not to proceed, the Site would be developed for other warehousing and distribution related purposes.

(b) Development on an Alternative Site

Due consideration with regard to alternative sites was given; however, these were dismissed as the Site resulted in the most beneficial outcomes for the proposed development as:

- It is located subject to the provisions of SEPP WSEA, which seeks to provide employment-generating land uses;
- The Site is suitably located with respect to sensitive land activities, including residential development;
- All potential environmental impacts of the proposed development could be suitably mitigated within the Site;
- The proximity to the regional road network provides accessibility and linkages to the broader metropolitan area and regional areas of NSW;
- The proposed development has significant employment-generating potential, during both the construction and operational phases;
- Sufficient separation is maintained to the interface of surrounding rural / residential development;
- The proposed development does not adversely affect any area of heritage or archaeological significance; and,
- The proposed development could be developed with appropriate visual amenity achieved, given its surrounding context.

The proposed development is justified on the basis it is compatible with the locality in which it is proposed, resulting in social and economic benefits while managing and mitigating environmental impacts.

3.5 SNACK BRANDS AUSTRALIA

Snack Brands Australia (Snack Brands) have experienced exponential growth since their establishment in 1996. Snack Brands are responsible for the production of over 200 million packets per annum, which equates to approximately 74% of Australian households buying at least one (1) packet / product every year.¹ Snack Brands overall operation is based on their six (6) integrated business values, including:

1. *"Can Do" – Committed, Accountable, Positive, Making it Happen;*
2. *Real, Authentic People. "No B.S." Have Fun Getting the Job Done;*
3. *"Be Bold" Think Big Have a Go – Back Yourself;*

¹ Snack Brands Australia – About Us (2018)

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4. *"Agile" Responsive, Learn and Adapt, Faster and Smarter;*
5. *"Play to Win" We are Result Focused & Love Beating the Odds; and,*
6. *"Always Thinking" – Creativity, Ideas and Innovation with a Passion to Improve.*

It is important to establish a fundamental understanding of the business, prior to justifying the reasoning behind the proposed development, as the above statements currently do. The subsequent sections accurately articulate the reasoning behind the proposed development.

From a locational perspective, First Estate, particularly the Subject Site (Lot 7) was chosen by Snack Brands as it would be able to accommodate the proposed development, as-well-as any future developments proposed, via means of expansion. The Site's locality is considered satisfactory from a geotechnical standpoint concerning the potential to house a high bay warehouse, which requires very precise levels. This would enable the Automated Storage and Retrieval System (ASRS) proposed (refer to **Appendix 5, 20 & 21**), to be located within the high bay warehouse to ultimately operate to its optimum potential, delivering high quality outputs, whilst maintaining an efficient operation. Additionally, the Site's locality is reinforced by its close proximity to nearby regional road networks such as the M4 & M7 Motorways, which is deemed critical to minimising the freight costs associated with interstate distribution to relevant customers.

The proposed high bay warehouse would house operational machinery, such as ASRS (cranes), as stated above. By implementing ASRS into the desired operational business model, this would provide the high-density storage required by Snack Brands, whilst maintaining a cost effective and efficient logistics operation. Furthermore, enabling a high-density racking area, for which the ASRS would work parallel with, would maximise the overall pallet storage on a given footprint (juxtaposed to a low bay warehouse). This would be further reinforced by the proposed ASRS, which would subsidise necessary costs, and as a result complement an efficient and high-speed high bay warehouse rather than a low bay warehouse, which would exhibit a higher cost due to the increased demand for machinery.

As a general note, ASRS is widely used in Europe, Japan and throughout the USA. Limited examples in Australia have implemented such systems due to the relative costs of such machinery; however, recent years have seen a reduction in costs, making the option for the identified machinery to be perceived as a suitable operational option for large scale businesses throughout Australia. Snack Brands have indicated that it is likely that ASRS will become commonplace in businesses in the coming years.

The proposed development for Snack Brands would facilitate an employment-generating development, adhering to the objectives set out in SEPP WSEA. The proposed development would consolidate three (3) operating sites into one (1) focal site. As a result, the proposed ASRS would see a reduction in the total amount of staff required; however, the proposed development would require employment of approximately 87 personnel (not including the projected 300 jobs at the construction phase of development). Snack Brands has stated that the proposed ASRS would require staff to be competent in managing automated systems, which would result in a generalised 'upskilling' of the overall workforce in addition to the standard crew, whom would be loading delivery trucks with conventional forklifts.

Operationally, the proposed high bay warehouse (11,025 m²) would pertain a proposed height of 36.0 m, which would attribute to approximately 37% of the proposed built-form of the Site. As mentioned, the proposed high bay warehouse would make provisions for ASRS, which would include 12 automated cranes and high-density racking for approximately 50,000 pallet spaces. Palletised goods would then be automatically loaded onto trucks that are in the corresponding loading bays to their associated racking. Contrasted to this, is the proposed low bay warehouse, which would be for staging, truck loading, 'part-pallet picking' and some formalised packing operations.

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Current operations between three (3) varied sites constitutes deliveries made by shuttle-trucks, to and from the applicable sites. The proposed development would eliminate over 75 shuttle-truck deliveries by implementing an operation that encompasses a high bay warehouse, which would ultimately reduce the overall traffic footprint on the surrounding regional road network.

In summary, if the proposed development was to comprise of low bay warehouses only, the intended business model / case would not be able to be executed accordingly. Associated costs of procuring land required for a low bay operation would be considered prohibitive. Additionally, the payback for the ASRS only makes sense for high-density storage areas, alike to the stature and nature of a high bay warehouse, otherwise costs would not be considered feasible.

PART D LEGISLATIVE AND POLICY FRAMEWORK

Controls and Policies

The following current and draft Commonwealth, State, Regional and Local planning controls and policies have been considered in the preparation of this State Significant Development Application:

Commonwealth Planning Context

- *Environment Protection and Biodiversity Conservation Act 1999*

State Planning Context

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2000*
- *Protection of the Environment Operations Act 1979*
- *Threatened Species Conservation Act 1995*
- *State Environmental Planning Policy (State and Regional Development) 2011*
- *State Environmental Planning Policy (Infrastructure) 2007*
- *State Environmental Planning Policy (Western Sydney Employment Area) 2009*
- *State Environmental Planning Policy No. 19 – Bushland in Urban Areas*
- *State Environmental Planning Policy No.33 – Hazardous and Offensive Development*
- *State Environmental Planning Policy No 55 – Remediation of Land*

Regional Planning Context

- *NSW 2021: A Plan to Make NSW Number One*
- *Greater Sydney Regional Plan*
- *Western City District Plan*

Local Planning Context

- *Penrith Local Environmental Plan 2010*
- *Penrith Development Control Plan 2014*
- *Penrith City Council Community Plan*
- *Mamre West Precinct Development Control Plan*

This planning framework is considered in detail in the following sections:

4.1 COMMONWEALTH PLANNING CONTEXT

4.1.1 Environment Protection and Biodiversity Conservation Act 1999

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

Clearing of the Site was approved under SSD 7173; therefore, further consideration is not required in this respect.

4.2 STATE PLANNING CONTEXT

4.2.1 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) is the overarching governing statute for all development in NSW and pursuant to Section 4.36(2) provides that:

A State environmental planning policy may declare any development, or any class or description of development, to be State significant development.

The proposed development has been identified as State Significant Development under the SRD SEPP as outlined below in **Section 4.2.5**.

4.2.2 Environmental Planning and Assessment Regulation 2000

Section 4(1) – Designated Development

Section 4(1) of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) states that development described in Part 1 of Schedule 3 is declared to be Designated Development for the purposes of the Act.

The proposed development being for a proposed Warehouse and Distribution Facility does not trigger the designated development thresholds.

4.2.3 Biodiversity Conservation Act 2016

The *Biodiversity Conservation Act 2016* (BC Act) is the key piece of legislation in NSW relating to the protection and management of biodiversity and threatened species. The purpose of the BC Act is to maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development. The BC Act is supported by a number of regulations, including the Biodiversity Conservation Regulation 2017 (BC Regulation).

Clearing of the Site was approved under SSD 7173, therefore further consideration is not required in this respect.

4.2.4 Protection of the Environment Operations Act 1979

Schedule 1 of the *Protection of the Environment Operations Act 1979* (POEO Act) contains a core list of activities that require a licence before they may be undertaken or carried out. The definition of an 'activity' for the purposes of the POEO Act is:

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

The proposed development as submitted to the NSW DP&E does not trigger any thresholds in respect of this legislation.

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

Proposed developments involving activities that are listed in Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP) are identified as being State Significant Development. Clause 12 of Schedule 1 states:

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12 Warehouses or Distribution Centres

- (1) Development that has a capital investment value of more than \$50 million for the purpose of warehouses or distribution centres (including container storage facilities) at one location and related to the same operation.*
- (2) This clause does not apply to development for the purposes of warehouses or distribution centres to which clause 18 or 19 applies.*

The proposed development relates to the development of a Warehouse and Distribution Facility for Snack Brands on Lot 7 of First Estate. The proposed development has a CIV over \$50 M and is therefore considered as SSD. This EIS has been prepared based on the SEARs issued on 2 August 2018.

4.2.6 State Environmental Planning Policy (Infrastructure) 2007

State Environmental Planning Policy (Infrastructure) 2007 (ISEPP) repeals the former *State Environmental Planning Policy No. 11 – Traffic Generating Development* and, pursuant to Clause 104 and provides for certain proposed developments known as Traffic Generating Development, to be referred to NSW Roads and Maritime Services (RMS) for concurrence.

Schedule 3 lists the types of development that are defined as Traffic Generating Development. The referral thresholds for 'Industry' development include:

- *20,000m² or more in area with site access to any road; or*
- *5,000m² or more in area where the site has access to a classified road or to a road that connects to a classified road (if access is within 90 metres of connection, measured along the alignment of the connecting road).*

As the proposed development seeks consent for more than 20,000 m² GFA, referral to RMS is required under the SEPP.

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

The site forms part of the WSEA and is subject to the provisions of SEPP WSEA. On 24 June 2016, the Site was rezoned to General Industrial (IN1) as part of a proponent led rezoning proposal.

Permissibility

The Site is zoned General Industrial (IN1) under the provisions of SEPP WSEA.

The objectives of the General Industrial (IN1) zone are as follows:

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

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The proposed development would successfully adhere to the zone objectives outlined in SEPP WSEA.

Within the General Industrial (IN1) zone the following are permissible without consent:

- *Nil.*

Within the General Industrial (IN1) zone the following are permissible with consent:

- *Depots; Food and drink premises; Freight transport facilities; Industrial retail outlets; Industrial training facilities; Industries (other than offensive or hazardous industries); Neighbourhood shops; Roads; Service stations; Transport depots; Truck depots; Warehouse or distribution centres.*

Within the General Industrial (IN1) zone the following are prohibited:

- *Any development not specified in item 2 or 3.*

In accordance with the above, the proposed development – Warehouse & Distribution Facility would be permissible subject to development consent (refer to **Figure 11**).

Subdivision

No subdivision is proposed.

Requirements for Development Control Plans

The Mamre West Precinct Development Control Plan (DCP) has been prepared in accordance with Part 4 of SEPP WSEA and would be applied accordingly to the proposed development's built form characteristics.

Below in **Table 9** is a summary of the SEPP WSEA provisions as they apply to the proposed development.

Table 7: SEPP WSEA Provisions	
Clause	Comment
Clause 20: Ecologically Sustainable Development	<p>The proposed development would incorporate a number of ecologically sustainable initiatives to reduce the consumption of potable water and greenhouse gas emissions of the facilities. Initiatives relate to:</p> <ul style="list-style-type: none">▪ Energy & Greenhouse Gas Emissions▪ Potable water reduction▪ Minimising waste to landfill▪ The Indoor Environment▪ Occupant amenity and comfort▪ Land Use & Ecology▪ Emissions and▪ Building Management. <p>Further details are provided in the <i>585-649 Mamre Road Ecologically Sustainable Design Report</i> (refer to Appendix 12) summarised in Section 6.18 of this EIS.</p>
Clause 21: Height of Buildings	<p>The proposed building height is 36 m in part (high bay warehouse), with the remaining portion proposed at 13.7 m (low bay warehouse).</p> <p>The height of the building should not result in adverse amenity impacts</p>

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Proposed Warehouse and Distribution Facility

Lot 7, 585-649 Mamre Road, Orchard Hills (Snack Brands)

	<p>on surrounding land as sufficient setbacks would be achieved and articulation in the form is provided.</p> <p>A detailed Visual Impact Assessment (Section 6.3) is summarised further throughout this EIS (refer to Appendix 7).</p>
Clause 22: Rainwater Harvesting	<p><i>"the consent authority must not grant consent to development on land to which this Policy applies unless it is satisfied that adequate arrangements will be made to connect the roof areas of buildings to such rainwater harvesting scheme (if any) as may be approved by the Director-General."</i></p> <p>Rainwater harvesting would be provided for this development with re-use for non-potable applications as part of this SSD Application for the built-form characteristics. Internal uses include such applications as toilet flushing while external applications would be used for irrigation. In general terms, the rainwater harvesting system would be an in-line tank for collection and storage of rainwater. At times when the rainwater storage tank is full, rainwater could pass through the tank and continue to be discharged via gravity into the stormwater drainage system. Rainwater from the storage tank would be pumped for distribution throughout the development in a dedicated non-potable water reticulation system.</p>
Clause 23: Development Adjoining Residential Land	<p>In consideration of Clause 23 of SEPP WSEA, a Visual Impact Assessment, summarised throughout this EIS provides due consideration with regard to the resultant visual impacts of the proposed warehouse and distribution facility from the receiving environments.</p> <p>The proposed development has been considered against the provisions of Clause 23 of SEPP WSEA as detailed below:</p> <p><i>a) wherever appropriate, proposed buildings are compatible with the height, scale, siting and character of existing residential buildings in the vicinity</i></p> <p><u>Comment:</u> The proposal would be designed to achieve a compatible outcome with the surrounding environment, including the rural residential development located to the north, west and south, along with the existing warehouse facilities within First Estate and Erskine Business Park to the east. Measures incorporated within the design include the following:</p> <ul style="list-style-type: none"> ▪ Setbacks to the respective boundaries that allow for visual separation and deep soil planting – quantity setback ▪ Noise screening where required. ▪ Provision of building materials which provide articulation and visual interest. <p><i>b) goods, plant, equipment and other material resulting from the development are to be stored within a building or will be suitably screened from view from residential buildings and associated land</i></p> <p><u>Comment:</u> Goods, plant and equipment would be suitably screened from the adjacent rural/residential development by way of screening devices and planting. Coupled with the separation distances to the</p>

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	<p>surrounding residential development (in excess of 250m), the proposed development is considered unobtrusive and shall retain a sufficient level of amenity for these properties. All plant and equipment associated with the proposed development is considered typical for warehouse facility such as that proposed and is consistent in their design and function with those within the surrounding employment lands.</p> <p><i>c) the development will not otherwise cause nuisance to residents, by way of hours of operation, traffic movement, parking, headlight glare, security lighting or the like</i></p> <p><u>Comment:</u> Given the separation distances to the rural/residential properties to the north, and proposed future mitigation measures in respect of noise, it is considered that there would be no adverse impacts that should occur. Light spill would be managed through the strategic location of outdoor lighting at ground level, on building facades and under awnings and should comply with AS4282-1997.</p> <p>Lighting would be directional towards the car parking similar to traffic street lighting that is required for the new council access road to minimise light spillage. A light spill diagram would be provided which demonstrates there would be no light spill on the residential properties.</p> <p>The resultant noise impacts associated with the movement of vehicles and hours of operation would be mitigated through the proposed acoustic mitigation measures in the design of the warehouse facility.</p> <p><i>d) the development will provide adequate off-street parking, relative to the demand for parking likely to be generated</i></p> <p><u>Comment:</u> In total, 114 car parking spaces would be provided in accordance with the Mamre West Precinct DCP, thus the provision of parking is deemed compliant.</p> <p><i>e) the site of the proposed development will be suitably landscaped, particularly between any building and the street alignment.</i></p> <p><u>Comment:</u> Landscaping would be proposed between the proposed facility fronting Mamre Road and the boundary, with a landscaped setback provided. This area would comprise screen planting and shrubs that serve to provide a buffer between the public domain and the proposed estate, similar to planting schemes achieved on surrounding sites.</p>
Clause 24: Development Involving Subdivision	The proposed development does not seek consent for subdivision.
Clause 25: Public Utility Infrastructure	Existing services would be augmented for the proposed development. Any works in this respect would be at no cost to the government.
Clause 26: Development on or in Vicinity of Proposed Transport	The proposed development is noted to be generally clear of the proposed Southern Link Road under Clause 26. Notwithstanding, under Clause 26 the proposed development would be referred to the Secretary seeking concurrence.

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Infrastructure Routes	
Clause 29: Industrial Release Area Satisfactory Arrangement for the Provision of Regional Transport Infrastructure Facilities	Under SSD 7173, a Voluntary Planning Agreement (VPA) was entered into with the Minister for Planning. Notwithstanding, under Clause 29 the proposed development would be referred to the Secretary seeking concurrence, which would verify further that Satisfactory Arrangements have been made for transport infrastructure in relation to the proposed development.
Clause 31: Design Principles	<p>The design principles of the SEPP are investigated and summarised further in subsequent sections of this EIS (refer to Section 6.3). The proposed development seeks to address the below provisions as follows:</p> <p><i>a) the development is of a high quality design, and</i></p> <p><u>Comment:</u> Materials and finishes would activate and provide a visual outcome that seamlessly integrates with the surrounding employment lands throughout the wider WSEA.</p> <p><i>b) A variety of materials and external finishes for the external facades are incorporated, and</i></p> <p><u>Comment:</u> Colour and material direction would be utilised where possible to blend with the varied architectural forms. Additionally, translucent façade sheeting would be utilised to create visual interest as-well-as allowing natural light to transmit into the warehouse area. Proposed offices would integrate various complementary volumetric shapes and materials, conducive to transparency of function and response to sustainable building practices. Timber panelling would also be used to highlight the main entry of the building.</p> <p><i>c) High quality landscaping is provided, and</i></p> <p><u>Comment:</u> Landscaping is proposed to comprise screen planting and shrubs that serve to provide a buffer between the public domain and the wider locality within First Estate, for both existing and proposed developments.</p> <p><i>d) The scale and character of the development is compatible with other employment-generating development in the precinct concerned.</i></p> <p><u>Comment:</u> The overall scale of the proposed development seeks to provide a transition from Erskine Business Park, being compatible in terms of built form and scale, and able to accommodate this specific employment-generating land use that is adaptable and responds accordingly to shifting economic conditions. Although the proposed development comprises a high bay component, future development within First Estate would offer a complementary gradual transition that blends the high bay component.</p>
Clause 31: Preservation of Trees	Approval for vegetation removal was previously granted under SSD 7173.

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Clause 33A: Development Near Zone Boundaries	The proposed development does not rely on Clause 33 to carry out the proposed development.
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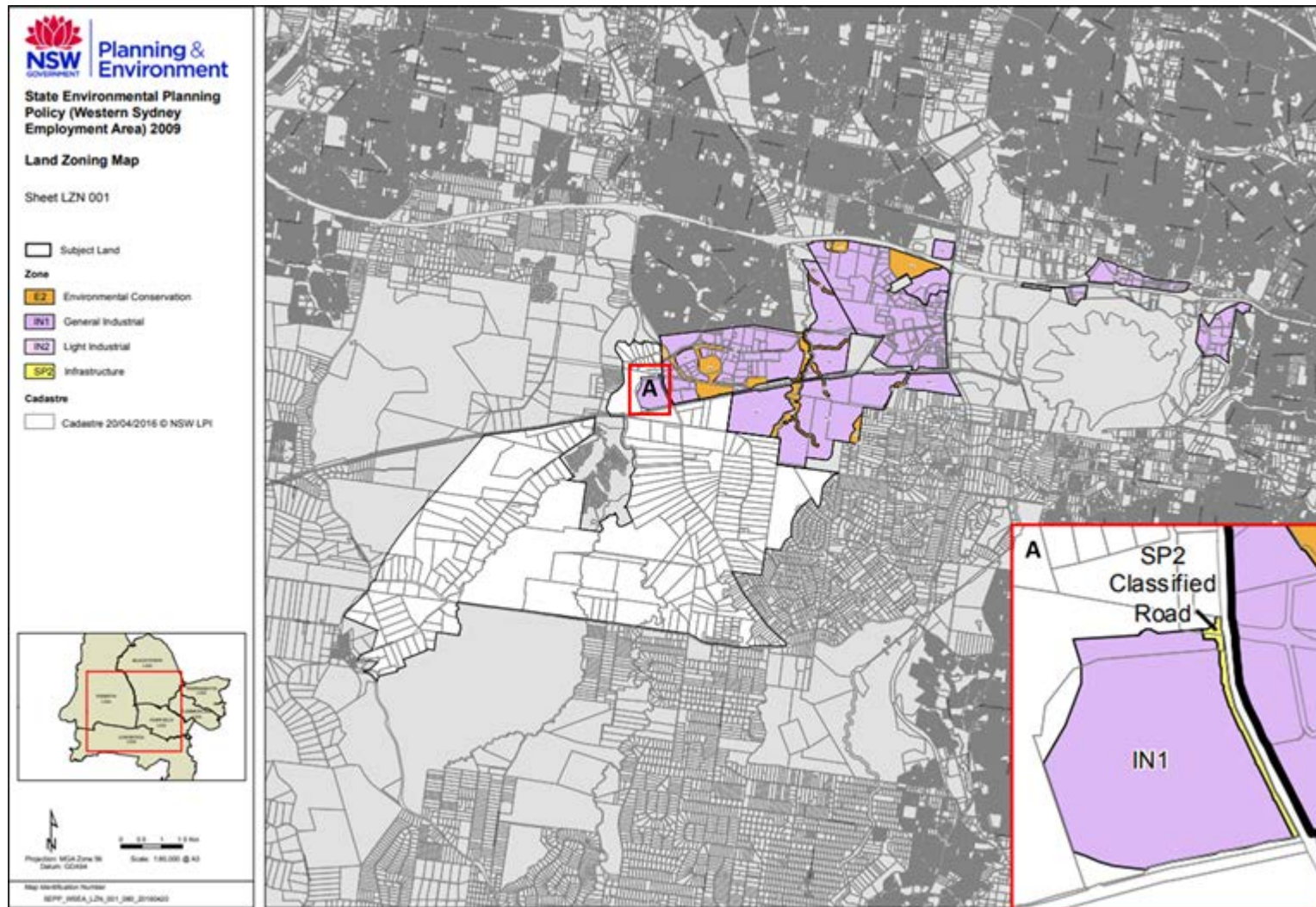


Figure 14 Site Zoning Layout (NSW Legislation, 2018)

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

No dangerous goods are to be stored within the proposed Warehouse and Distribution Facility. Any future proposals to store such goods would be subject to further assessment under *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development* (SEPP 33).

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

Under the provisions of *State Environmental Planning Policy No. 55 – Remediation of Land* (SEPP 55), where a development application is made concerning land that is contaminated, the consent authority must not grant consent unless:

- (a) it has considered whether the land is contaminated, and*
- (b) if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and*
- (c) if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.*

The suitability of the Site, in respect of SEPP 55 was previously considered under SSD 7173, which was approved in December 2016; therefore, further consideration is not required.

4.2.10 State Environmental Planning Policy No. 64 – Advertising Structures and Signage

State Environmental Planning Policy No 64 - Advertising and Signage (SEPP 64) applies to all signage:

- (a) that, under another environmental planning instrument that applies to the signage, can be displayed with or without development consent, and*
- (b) is visible from any public place or public reserve.*

The proposed development includes the erection of signage for the purposes of identification.

The location of the proposed signage is provided within the Architectural Plans at **Appendix 5**.

Directional signage internal to the Site would also be provided to ensure a high level of legibility is achieved for all vehicles and pedestrians accessing the various areas of the Site.

Pursuant to Clause 8 of SEPP 64, a consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied:

- (a) that the signage is consistent with the aims/objectives of the Policy, and*
- (b) that the signage satisfies the assessment criteria specified in Schedule 1 of SEPP 64.*

These matters are addressed below.

Aims and Objectives of SEPP 64

SEPP 64 aims:

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- (a) to ensure that signage (including advertising):
 - (i) is compatible with the desired amenity and visual character of an area, and
 - (ii) provides effective communication in suitable locations, and
 - (iii) is of high quality design and finish, and
- (b) to regulate signage (but not content) under Part 4 of the Act, and
- (c) to provide time-limited consents for the display of certain advertisements, and
- (d) to regulate the display of advertisements in transport corridors, and
- (e) to ensure that public benefits may be derived from advertising in and adjacent to transport corridors.

The proposed signage is proposed for the purpose of business identification and is considered to achieve the objectives of SEPP 64 as it relates directly to the use of the site for warehousing and reinforces the industrial character of the site in accordance with the prevailing character of the locality. The proposed signage would be of a high-quality design and finish and would integrate with the built form on the site in terms of siting, scale and design.

Assessment Criteria

The assessment criteria under Schedule 1 of SEPP 64 is addressed in **Table 10**.

Table 8: SEPP 64 Assessment Criteria	
Criteria	Proposal Compliance
1 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?</i>	Yes, the proposed signage is compatible with the industrial character of the site and its surrounds and would support the operation of the proposed facility on the site.
<i>Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?</i>	Yes, as above.
2 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?</i>	No, the site is not located in proximity of any significant built or natural sites or areas. The signage would be of a high-quality design and finish and would improve the visual amenity of the site through effective identification.
3 Views and vistas	
<i>Does the proposal obscure or compromise important views?</i>	No, the proposed signage would be of a height and scale consistent with the built form on the site and would not disrupt any views or dominate views toward the site.
<i>Does the proposal dominate the skyline and reduce the quality of vistas?</i>	No, the proposed signage would be of a height and scale consistent with the built form on the site and would not dominate the skyline.
<i>Does the proposal respect the viewing rights of other advertisers?</i>	Yes, the signage would not obstruct any other signage or advertising.
4 Streetscape, setting or landscape	

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<i>Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?</i>	Yes, the signage has been designed in respect of the proposed built form on the site to effectively identify the warehouse/industrial facilities whilst not being visually obtrusive. The proposed signage is compatible with the industrial character of the site and its surrounds.
<i>Does the proposal contribute to the visual interest of the streetscape, setting or landscape?</i>	Yes, the signage would visually define the facility on the site and would be integrated with façade treatment to create a visually coherent built form.
<i>Does the proposal reduce clutter by rationalising and simplifying existing advertising?</i>	No, there is no other signage in proximity of the subject site. Therefore, the proposed signage would not cause any clutter.
<i>Does the proposal screen unsightliness?</i>	No, the signage is not used as a visual screen or filter.
<i>Does the proposal protrude above buildings, structures or tree canopies in the area or locality?</i>	No, the signage would not protrude above the roof line or tree canopy.
<i>Does the proposal require ongoing vegetation management?</i>	No, the proposed signage would not require ongoing management.
5 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?</i>	Yes, the signage is of suitable scale and design for its intended purpose to effectively identify the business operating on-site and would integrate with the proposed built form and façade design to achieve visual coherence.
<i>Does the proposal respect important features of the site or building, or both?</i>	Yes, the signage would be balanced with façade elements to integrate with the proposed built form. The proposed signage would not dominate the landscape or be visually obtrusive.
<i>Does the proposal show innovation and imagination in its relationship to the site or building, or both?</i>	Yes, the signage has been integrated with the layout of the site so as not to obstruct any vehicle movements and achieve a positive visual outcome.
6 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?</i>	Illumination is proposed for all signage to provide a high level of visibility.
7 Illumination	
<i>Would illumination result in unacceptable glare?</i>	Illumination would not result in unacceptable glare.
<i>Would illumination affect safety for</i>	Illumination would not detract from the

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<i>pedestrians, vehicles or aircraft?</i>	safety of any pedestrians, vehicles or aircraft.
<i>Would illumination detract from the amenity of any residence or other form of accommodation?</i>	The site is not in proximity of any residential or other sensitive land uses and would not adversely affect the amenity of any development.
<i>Is the illumination subject to a curfew?</i>	No curfew is proposed.
<i>Can the intensity of the illumination be adjusted, if necessary?</i>	Illumination would be of a suitable intensity.
8 Safety	
<i>Would the proposal reduce the safety for any public road?</i>	No, the proposed signage is located within the site boundaries and is well set back from the street.
<i>Would the proposal reduce the safety for pedestrians or bicyclists?</i>	No, the proposal would not obstruct any pedestrian or cycle routes or infrastructure and therefore would not negate the safety of pedestrians or cyclists.
<i>Would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas?</i>	No, the proposed signage would not obscure any sightlines from public areas frequented by pedestrians. Neither would the proposed signage obstruct any vehicle sight lines from public roads.

Based on the above, the proposed development is considered consistent with the provisions of SEPP 64.

4.3 REGIONAL PLANNING CONTEXT

4.3.1 NSW 2021: A Plan to Make NSW Number One

NSW 2021 was developed by the NSW State Government to set economic, social and environmental directions for NSW. It sets targets, priorities and actions for delivery of services across the State. The proposed development is consistent with the five (5) agenda items under *NSW 2021*, including:

- *Rebuild the economy*
- *Return quality services*
- *Renovate infrastructure*
- *Strengthen our local environment and communities*
- *Restore accountability to government*

The piece addressing 'Rebuild the Economy', coincides most relevantly to the proposed development as it provides objectives for achieving growth and prosperity. The Plan makes a commitment that supports large and small businesses and describes the importance of the private sector's role in maintaining and creating highly productive jobs to underpin the State's ability to realise higher standards of living for all people.

The proposed development would further encourage the use of industrial land, promoting an employment-generating industrial operation. In turn, this would:

- Create construction and operational jobs, enhancing the commercial activity in the wider locality;
- Generate employment diversity near to where people live – near (~1.6km) to St Clair, and the wider Erskine Park residential areas;

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- Deliver on Penrith City Council's strategic vision for the site adopting the principles / themes set out in both the Community Strategic Plan (2017), and the Delivery Program: 2017-2021 (2017).

All of these would contribute towards the return of quality services to residents of NSW, specifically, throughout the wider locality within the Penrith LGA.

4.3.2 Greater Sydney Region Plan

The *Greater Sydney Region Plan* (**Figure 12**) aims to meet and recognise the warranted needs of an accelerated and vastly changing population. The overall vision pursues an objective of transforming 'Greater Sydney' into a metropolis of three (3) cities, including:

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

The division into three (3) cities puts workers and the wider community closer to an array of characteristics such as, intensive jobs, 'city-scale' infrastructure & services, entertainment and cultural facilities. By managing and retaining industrial land close to city centres and transport, this will ensure critical and essential services are readily available to support local businesses and community members and residents. The proposed development would not only achieve economic growth and prosperity but would encourage employment-generating opportunities that are considered relatively close in conjunction with residential communities, for ease of commute.

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

- Infrastructure and collaboration – once in operation, the proposed development would be able to provide a locally derived sources readily available for distribution for local use, as-well-as operating on a national and global scale;
- Liveability – the proposed development encourages employment-generating opportunities and economic prosperity, which would have positive influences on the wider locality by promoting a sense of community engagement through locally sourced and supplied products;
- Productivity – the proposed development would be situated within the Western City District Plan (**section 4.3.3**), and furthermore, the Western Sydney Employment Area, adhering to the aims set out above in **Section 4.2.7**; and,
- Sustainability – the proposed development would not cause any detrimental impacts to its wider ecological surroundings as identified in **Part F** of this EIS.

In summary, the proposed development would contribute to the objectives set out in the *Greater Sydney Region Plan* by promoting minor environmental impacts and the further promotion of employment-generating opportunities to the wider locality and community by being positioned within the WSEA.

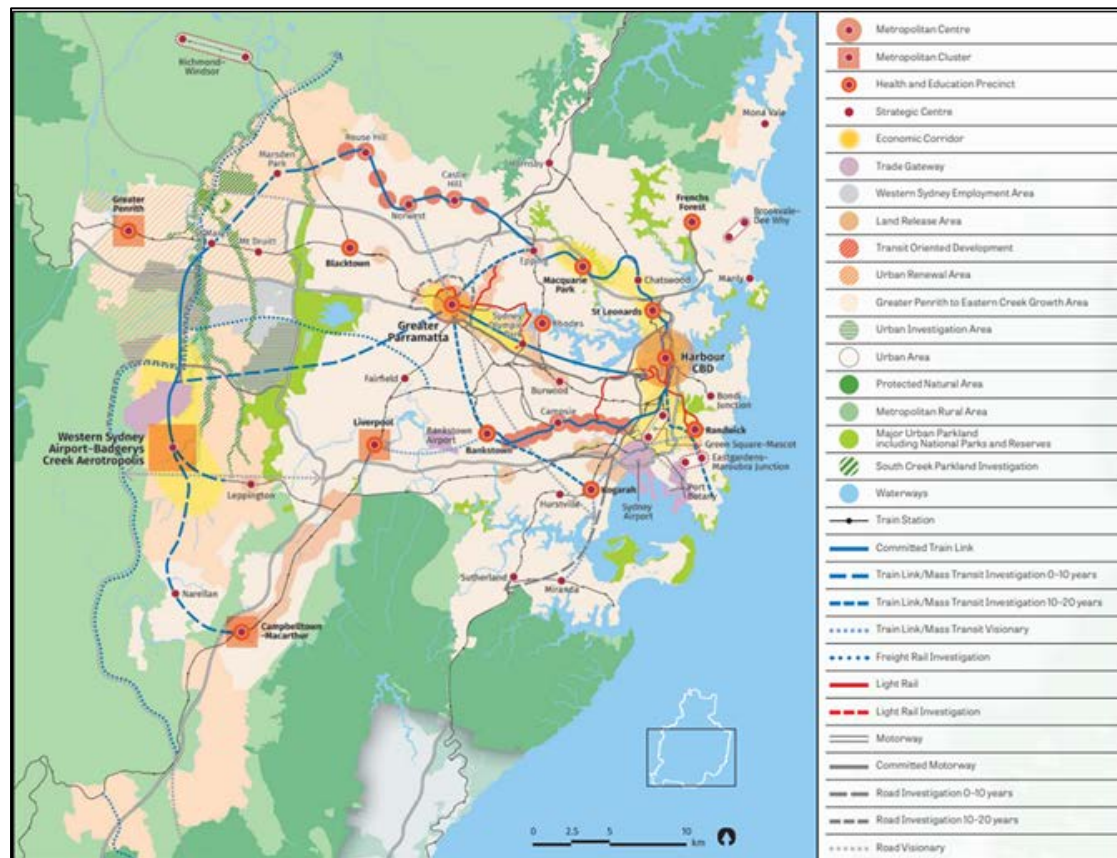


Figure 15 Metropolis of 3 Cities A Vision to 2056 (Greater Sydney Commission: Greater Sydney Region Plan, 2018)

4.3.3 Western City District Plan

The *Western City District Plan* covers the Penrith City Council Local Government Area (LGA). The Plan encourages a twenty-year plan to help encourage and establish the goals set out in the *Greater Sydney Region Plan* mentioned above. The Plan is considered a 'bridge' between Regional and Local planning.

Orchard Hills is situated within the Western City District, which falls within the Western Parkland City.

The Plan reinforces the four (4) planning priorities and action items for concern as previously mentioned in **Section 4.3.2**. The Plan establishes a number of priorities and actions to guide growth, development and change, relating to infrastructure & collaboration, liveability, productivity and sustainability.

The Greater Sydney Commission webpage further reinforces the Plan's potential for achievement by outlining the following strategies, including:

- *Creating a once-in-a-generation economic boom with the Western Sydney Airport and Badgerys Creek Aerotropolis bringing together infrastructure, businesses and knowledge intensive jobs;*
- *Building on the Western Sydney City Deal to transform the Western City District over the next 20 to 40 years by building on natural and community assets and developing a more contained Western City District with a greater choice of jobs, transport and services aligned with growth;*
- *Delivering the first stage of the North South Rail Link*

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- *Collaborating and building strong relationships between Liverpool, Greater Penrith and Campbelltown-Macarthur reinforced by the emerging Badgerys Creek Aerotropolis forming a unique metropolitan cluster;*
- *Providing major transport links for people and freight by unprecedented transport investments;*
- *Developing a range of housing, providing access to public transport and infrastructure including schools, hospitals and community facilities;*
- *Linking walking and cycling paths, bushland and a green urban landscape framed by the Greater Blue Mountains World Heritage Area, the Scenic Hills and Western Sydney Parklands;*
- *Enhancing and protecting South Creek, Georges River and Hawkesbury-Nepean river systems;*
- *Mitigating the heat island effect and providing cooler places by extending urban tree canopy and retaining water in the landscape*
- *Protecting the District's natural landscapes, heritage and tourism assets, unique rural areas and villages; and,*
- *Protecting the environmental, social and economic values of the Metropolitan Rural Area.*

The proposed development would contribute to the objectives set out in the *Western City District Plan* by promoting a greater range of land uses of benefit to the community including the proposed warehouse and distribution facility and other commensurate land uses; facilitating the provision of greater and improved infrastructure; and, promoting additional employment-generating opportunities (relevant to the proposed development) to the wider locality and community closer to home, whilst supporting an economically and environmentally sustainable proposed development.

4.3.4 Western Sydney Employment Area

The aims and objectives of the WSEA are summarised below, including:

- Promoting an economically sustainable development, and reinforcing the status of an employment-generating proposed development that positively contributes to the WSEA;
- Encourages assurances for the coordinated planning and development of land within the WSEA;
- Ensures minimal environmental and amenity impacts – **Part F** of this EIS accurately describes the environmental outcomes of the proposed development; and,
- Ensures development is compatible with surrounding development and the local context.

As outlined in **Section 3.1**, the proposed development is considered to meet the objectives outlined as it enables development on land zoned for employment related uses.

4.3.5 Penrith City Council Community Plan

As an initiative to help guide the future of Penrith City Council's LGA, the *Penrith City Council: Community Plan* (2017) was developed to reflect the views and aspirations of the wider locality and community situated within the Penrith City Council LGA.

The proposed development would furthermore be met by aligning with five (5) of the core themes / outcomes highlighted in the Plan, including:

- *We can work close to home;*
- *We plan for our future growth;*
- *We care about our environment;*

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- *We are healthy and share strong community spirit; and,*
- *We have confidence in our council.*

4.4 LOCAL PLANNING CONTEXT

4.4.1 Penrith Local Environmental Plan 2010

It is noted that the provisions of *Penrith Local Environmental Plan 2010* (PLEP2010) do not apply to the Site.

In addition to the above, Part 2, Clause 11 of the SRD SEPP states:

11 Exclusion of application of development controls plans

Development controls plans (whether made before or after the commencement of this Policy) do not apply to:

(a) State significant development

4.4.2 Penrith Development Control Plan 2014

The *Penrith Development Control Plan 2014* (PDCP2014) provides a non-statutory instrument to guide development in the Penrith LGA, including land that is covered by SEPP WSEA. The Mamre West Precinct DCP has been prepared that establishes built form controls for the Mamre West Precinct to supersede the provisions of the general PDCP2014.

4.4.3 Mamre West Precinct Development Control Plan 2016

The Mamre West Precinct DCP has been adopted as part of the Precinct Planning for the Mamre West Precinct. **Table 9** provides an outline of the key numeric controls of the DCP as applicable to built form and provides an assessment of the proposed development in relation to these controls.

Table 9: Mamre West Precinct Development Control Plan		
Issue	Control	Comment
Minimum Lot Size	10,000 m ²	No subdivision proposed
Minimum Frontage	60 m	N/A – no subdivision proposed.
Building Setback	Mamre Road - 20 m (including a 10 m landscaped setback)	Complies – 20 m proposed.
	Subdivision Road - 7.5 m	Complies – 15 m proposed.
	Rear and Side – 5 m	Complies – exceeds 5 m.
	Water Supply Pipeline – 5 m	N/A
Building Height	20 m	The proposed development exceeds the 20 m height limit as the high bay warehouse component would be 36 m (pertaining to 36% of the facility), while the remainder would be 13.7 m (low bay warehouse). Despite this non-compliance, the proposed built form outcome is considered acceptable as it would be treated with various materials

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		<p>and colours to suitably activate the frontage and address the entry of the estate accordingly.</p> <p>The proposed building form and height would be considered in detail as part of the Visual Impact Assessment addressed in detail throughout this EIS (refer to Section 6.3).</p>
Car Parking	1 space/ 300 m ² warehouse GFA	114 car parking spaces have been provided in accordance with RMS requirements, which is considered compliant.
	1 space/ 40 m ² ancillary office GFA	

PART E CONSULTATION

5.1 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

An application to receive SEARs was submitted to the NSW DP&E (Reference No. SSD 9429). The SEARs were subsequently issued on 2 August 2018.

The SEARs are annexed as **Appendix 1**. An overview of how the requirements have been satisfied within the EIS is outline further in **Table 10** below. This document is also consistent with the minimum requirements for an EIS in Clauses 6 & 7 of Schedule 2 of the EP&A Regulation.

Table 10: How SEARs have been Satisfied	
General Requirements	How Addressed
The EIS for the proposed development must meet the form and content requirements in Clauses 6 & 7 of Schedule 2 of the EP&A Regulation.	This EIS has been prepared in accordance with Clauses 6 & 7 of Schedule 2 of the EP&A Regulation. The structure of this EIS addresses all legislative requirements.
Key Issues	
The EIS must include an assessment of all potential impacts of the proposed development on the existing environment (including cumulative impacts) and develop appropriate measures to avoid, minimise, mitigate and / or manage these potential impacts. As part of the EIS assessment the following matters must also be addressed.	Part F
Urban Design and Visual – including: provide a detailed design analysis of the proposed development with reference to the building form, height, setbacks, bulk and scale in the context of the immediate locality, the wider area and the desired future character of the area, including views, vistas, open space and the public domain; a detailed assessment (including photomontages and perspectives) of the facility (buildings and storage areas) including height, colour, scale, building materials and finishes, signage and lighting, particularly from nearby public receivers and significant vantage points of the broader public domain including Mamre Road; consideration of the layout and design of the development having regard to the surrounding vehicular, pedestrian and cycling networks; an options analysis and justification for the proposed design and site layout; and, develop a design report that establishes design guidelines and development parameters, and includes diagrams, illustrations and drawings to clarify the design intent of the proposal and which clearly demonstrates how design quality will be achieved in accordance with Clause 31 Design Principles of the State Environmental Planning Policy (Western Sydney Employment Area) 2009 – suitable landscaping incorporating endemic species.	Refer to Section 6.3 and Appendix 8, 9, 10 & 19 .
Suitability of the Site – including: an analysis of site constraints;	Refer to Section 2.5 .

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details of all development consents and approved plans for the existing industrial estate; and, a detailed justification that the site is suitable for the scale of the proposal, having regard to the site's surrounds and the potential visual impact of the development.	
Community and Stakeholder Engagement – including: a detailed community and stakeholder participation strategy which identifies who in the community has been consulted and a justification for their selection, other stakeholders consulted and the form(s) of consultation, including a justification for this approach; a report on the results of the implementation of the strategy including issues raised by the community and surrounding land owners and occupiers that may be impacted by the proposal; details of how issues raised during community and stakeholder consultation have been addressed and whether they have resulted in changes to the proposal; and, details of the proposed approach to future community and stakeholder engagement based on the results of consultation.	Refer to Part E
Strategic Context – including: details of any proposed consolidation or subdivision of land; and, a demonstration that the proposal is generally consistent with all relevant planning strategies, environmental planning instruments and development control plans (DCPs) and district plans. Outline and justify any inconsistencies with any of these documents.	Refer to Section 2.3 and 4.2 .
Traffic and Transport – including: a Traffic Impact Assessment detailing all daily and peak traffic and transport movements likely to be generated (vehicle, public transport, pedestrian and cycle trips) during construction and operation of the development, including a description of vehicle access routes and the impacts on nearby intersections; details of access to the site from the road network including intersection location, design and sight distance; an assessment of predicted impacts on road safety and the capacity of the road network to accommodate the development; detailed plans of the proposed site access and parking provision on site in accordance with the relevant Australian Standards; identification of any dangerous goods likely to be transported on arterial and local roads to/ from the site and, if necessary, the preparation of an incident management strategy; and, details of impact mitigation, management and monitoring measures.	Refer to Section 6.6 .
Soils and Water – including: a description of the water demands and a breakdown of water supplies, including a detailed site water balance; a description of the measures to minimise water use; a description of all wastewater generated on site; a detailed description of any cut and fill works and/ or additional retaining walls required to facilitate the development; a description of the proposed erosion and sediment controls during construction and operational phases of the development; a description of the surface and stormwater management system, including on site detention, and measures to treat or re-use water; an assessment of potential surface and groundwater impacts associated with the development; a description of the surface and stormwater management	Refer to Section 3.2.2, 3.2.3 & 6.5 .

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designed in accordance with Penrith City Council's Water Sensitive Urban Design Policy, including drainage design, on site detention, and measures to treat or re-use water; and, details of impact mitigation, management and monitoring measures.	
Noise and Vibration – including: a description of all potential noise and vibration sources during the construction and operational phases of the development, including on and off-site traffic noise; a cumulative noise impact assessment of all potential noise sources in accordance with relevant Environment Protection Authority guidelines; and, details of noise mitigation, management and monitoring measures.	Refer to Section 6.8 .
Air Quality – including: an assessment of the air quality impacts at private properties during construction and operation of the development, in accordance with the relevant Environment Protection Authority guidelines; and, details of any mitigation, management and monitoring measures required to prevent and/ or minimise emissions.	Refer to Section 6.9
Hazards and Risks – including: if the storage of dangerous goods is proposed on site, the Environmental Impact Statement must include a preliminary risk screening completed in accordance with <i>State Environmental Planning Policy No. 33 – Hazardous and Offensive Development</i> and <i>Applying SEPP 33</i> (DoP, 2011), with a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the development. Should preliminary screening indicate that the project is "potentially hazardous" a preliminary hazard analysis (PHA) must be prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis (DoP, 2011) and Multi-Level Risk Assessment (DoP, 2011).	Refer to Section 4.2.8 and 6.10 .
Waste – including: details of the quantities and classification of all waste streams to be generated on site during construction and operation; details of waste storage, handling and disposal during construction and operation; and, details of the measures that would be implemented to ensure that the development is consistent with the aims, objectives and guidance in the NSW Waste Avoidance and Resource Recovery Strategy 2014-2021.	Refer to Section 6.7
Bushfire and Incident Management – including: assess the level of hazard posed to future development on adjacent land and how the hazards may change as a result of development; and, address the requirements of Planning for Bush Fire Protection 2006 (RFS), in particular the provision of access (including perimeter roads) and water supply for firefighting purposes.	Refer to Section 6.15
Biodiversity – including: an assessment of the proposal's biodiversity impacts in accordance with the <i>Biodiversity Conservation Act 2016</i> , including the preparation of a Biodiversity Development Assessment Report (BDAR) where required under the Act, except where a waiver for preparation of a BDAR has been granted.	Refer to Section 6.11
Socio-Economic – including:	Refer to Section 6.12

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an analysis of the economic and social impacts of the development, particularly any benefits to the community.	
Consultation	
<p>During the preparation of the EIS, you must consult the relevant local, State or Commonwealth authorities, service providers, community groups and affected landowners. In particular you must consult with:</p> <p>Penrith City Council; Roads and Maritime Services; Transport for NSW; Office of Environment and Heritage; NSW Rural Fire Service; Fire and Rescue NSW; WaterNSW; and, Surrounding local residents and stakeholders.</p> <p>The EIS must describe the consultation process and the issues raised and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.</p> <p>For added due diligence, consultation letters were also sent to the following entities, including:</p> <p>Endeavour Energy; NSW Office of Water; and, Sydney Water.</p>	Refer to Section 5.2 .
Further Consultation After Two (2) Years	
If you do not lodge an application under Section 4.12(8) of the <i>Environmental Planning and Assessment Act 1979</i> within two (2) years of the issue date of these SEARs, you must consult with the Secretary in relation to any further requirements for lodgement.	Noted.

During the preparation of the SEARs, the NSW DP&E also consulted with stakeholders, and in the process obtained a list of their Key Issues for the proponent to assess throughout this EIS. These Key Issues are contained in **Table 11 - 14** below. Please note, Consultation Letters have been sent to the parties listed above.

Table 11: Penrith City Council's Key Issues for Assessment	
Key Issues	How Addressed
General Requirements	
<p>Water Quality and Drainage Considerations:</p> <p>Water management including stormwater disposal, water quality treatment and water conservation measures associated with this development will need to be addressed as per Council's Stormwater Drainage Specification for Building Developments and Council's Water Sensitive Urban Design Policy 2013, Technical Guideline and commitments made in the stormwater report for SSD 7173.</p>	Refer to Section 6.5 .
<p>Planning Considerations:</p> <p>As per the plans supplied there is a 6-metre-wide fire trail/emergency vehicle access within the 20-metre setback to</p>	Refer to the Architectural &

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<p>Mamre Road. There is a strong precedence in the area for a substantial landscaped 20 metre setback to main arterial roads. The visual quality of the landscaped setback fronting Mamre Road should be enhanced by the proposal and the provision of this access arrangement will likely undermine the provision of necessary landscaping within this setback zone. Opportunities for an alternate location for this access trail should be pursued which does not compromise or reduce landscaping in the setback zone; In addition, it is noted that the proposal provides a significant variation to the height requirements within the DCP 2016. Consideration of the building height variation requires an analysis of the surrounding character of the estate. The quality of the building design and the integration of the proposal into this established character would then be critical to support such a variation. This includes the quality of landscaping on the site and the provision of suitable tree canopy planting to ameliorate the bulk and scale of the proposed built form; and, The proposed concept option also indicates a plinth or pylon sign at the intersection. The location of such a sign including its height, width and design treatment should be integrated into the built form or landscape design as part of the development application.</p>	<p>Landscape Plans provided in Appendix 6 & 7.</p> <p>Refer to Section 6.3 for justification of height concerning the proposed high bay warehouse.</p> <p>Noted.</p>
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Table 12: NSW Office of Environment & Heritage Key Issues for Assessment

Key Issues	How Addressed
General Requirements	
<p>Aboriginal Cultural Heritage: OEH understands this was addressed and conditioned in the Concept Plan approval for the Site (SSD 7173).</p>	Noted.
<p>Flooding: OEH does not have the capacity at this time to provide formal comment in the timeframe given however recommends as a precautionary approach that the following requirements are included (refer to Appendix 1 of SEARs document).</p> <p>Biodiversity: OEH recommends that a Biodiversity Development Assessment Report (BDAR) waiver be sought.</p>	Noted.
<p>Sustainability: OEH also recommends that the NSW and ACT Governments Regional Climate Modelling (NARClIM) climate change projections developed for the Sydney Metropolitan area are used to inform the building design and asset life of the project. These included over 100 climate variables, including temperature, rainfall, hot days and cold nights, severe Forest Danger Index (FFDI) and are publicly available online and at fine resolution (10km and hourly intervals) for 20-year time periods: 2020-2039 near future and long-term 2060-2079. Further, sustainable design measures such as green roofs should be incorporated into the project design to maximise the long-term Ecologically Sustainable Development outcomes of the proposal. In this regard, at the item titled Ecologically Sustainable Development of the draft SEARs, OEH recommends the following items are added. The development incorporates green walls, green roof and / or a cool roof into the design; The climate change projections developed for the Sydney</p>	<p>Noted.</p> <p>Refer to Section 6.18 and Appendix 14.</p>

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metropolitan area are used to inform the building design and asset life of the project.	
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Table 13: Roads and Maritime Services (RMS) Key Issues for Assessment	
Key Issues	How Addressed
General Requirements	
Daily and peak traffic movements likely to be generated by the proposed development including the impact on nearby intersections and the need/associated funding for upgrading or road improvement works (if required).	Refer to Section 6.6 and Appendix 11 .
The key intersections to be examined / modelled include: Site Access Road / Mamre Road	
Details of the proposed accesses and the parking provisions associated with the proposed development including compliance with the requirements of the relevant Australian Standards (ie: turn paths, sight distance requirements, aisle widths, etc).	As above.
Proposed number of car parking spaces and compliance with the appropriate parking codes.	As above.
Details of light and heavy vehicle movements (including vehicle type and likely arrival and departure times).	As above.
To ensure that the above requirements are fully addressed, the transport and traffic study must properly ascertain the cumulative study area traffic impacts associated with the development (and any other known proposed developments in the area). This process provides an opportunity to identify a package of traffic and transport infrastructure measures required to support future development. Regional and local intersection and road improvements, vehicular access options for adjoining sites, public transport needs, the timing and cost of infrastructure works and the identification of funding responsibilities associated with the development should be identified.	As above.
Roads and Maritime requires the Environmental Assessment report to assess the implications of the proposed development for non-car travel modes (including public transport use, walking and cycling); the potential for implementing a location-specific sustainable travel plan (eg 'Travelsmart' or other travel behaviour change initiative); and the provision of facilities to increase the non-car mode share for travel to and from the site. This will entail an assessment of the accessibility of the development site by public transport.	Refer to Section 6.3 & 6.6 and Appendix 11 .
Roads and Maritime requires an assessment of the likely toxicity levels of loads transported on arterial and local roads to / from the site and, consequently, the preparation of an incident management strategy for crashes involving such loads, if relevant.	

Table 14: Transport for NSW Key Issues for Assessment	
Key Issues	How Addressed
General Requirements	
details all daily and peak traffic and transport movements likely to be generated (light and heavy vehicle, public transport, pedestrian and cycle trips) during construction and operation of the development.	Refer to Section 6.6 and Appendix 11 .
details of the current daily and peak hour vehicle, public transport, pedestrian and bicycle movements and existing traffic and	As above.

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transport facilities provided on the road network located adjacent to the proposed development.	
an assessment of the operation of existing and future transport networks including public transport, pedestrian and bicycle provisions and their ability to accommodate the forecast number of trips to and from the development.	Refer to Section 6.3 & 6.6 and Appendix 11 .
details the type of heavy vehicles likely to be used (e.g. B-doubles) during the operation of the development and the impacts of heavy vehicles on nearby intersections.	Refer to Section 6.6 and Appendix 11 .
details of access to, from and within the site from the road network including intersection location, design and sight distance (i.e. turning lanes, swept paths, sight distance requirements).	As above.
impact of the proposed development on existing and future public transport and walking and cycling infrastructure within and surrounding the site.	Refer to Section 6.3 & 6.6 and Appendix 11 .
an assessment of the existing and future performance of key intersections providing access to the site (Mamre Road and the First Estate Access Road), and any upgrades (road/ intersections) required as a result of the development.	Refer to Section 6.6 and Appendix 11 .
an assessment of predicted impacts on road safety and the capacity of the road network to accommodate the development.	As above.
demonstrate the measures to be implemented to encourage employees of the development to make sustainable travel choices, including walking, cycling, public transport and car sharing	Refer to Section 6.3 & 6.6 and Appendix 11 .
appropriate provision, design and location of on-site bicycle parking, and how bicycle provision will be integrated with the existing bicycle network.	As above.
details of the proposed number of car parking spaces and compliance with appropriate parking codes and justify the level of car parking provided on the site.	As above.
details of access and parking arrangements for emergency vehicles.	As above, as-well-as Appendix 6 .
detailed plans of the proposed layout of the internal road network and parking provision on-site in accordance with the relevant Australian Standards.	Refer to Appendices 6 & 11 .
details of any likely dangerous goods to be transported on arterial and local roads to/from the site, if any, and the preparation of an incident management strategy, if necessary.	Refer to Section 4.2.8 and 6.10 .
the existing and proposed pedestrian and bicycle routes and end of trip facilities within the vicinity of and surrounding the site and to public transport facilities as well as measures to maintain road and personal safety in line with CPTED principles.	Refer to Section 6.3 & 6.6 and Appendix 11 .
preparation of a draft Construction Traffic Management Plan which includes: details of vehicle routes, number of trucks, hours of operation, access management and traffic control measures for all stages of construction; assessment of cumulative impacts associated with other construction activities; an assessment of road safety at key intersections; details of anticipated peak hour and daily truck movements to and from the site; details of access arrangements for workers to / from the site, emergency vehicles and service vehicle movements; details of temporary cycling and pedestrian access during constructions;	Refer to Section 6.6 and Appendix 11 .

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an assessment of traffic and transport impacts during construction and how these impacts during construction and how these impacts will be mitigated for any associated traffic, pedestrian, cyclists and public transport operations.	
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5.2 STAKEHOLDER CONSULTATION

Table 10 in **Section 5.1** lists the stakeholders which were required to be consulted with as per the SEARs issued by the NSW DP&E. These include:

- Penrith City Council;
- Roads and Maritime Services;
- Transport for NSW;
- Office of Environment and Heritage;
- NSW Rural Fire Service;
- Fire and Rescue NSW;
- WaterNSW; and,
- Surrounding local residents and stakeholders.

For added due diligence, consultation letters were also sent to the following entities, including:

- Endeavour Energy;
- NSW Office of Water; and,
- Sydney Water.

Ongoing consultation has occurred to date as part of the previously rezoned land and approved SSD 7173, as-well-as the subject SSD Application for Snack Brands, forming part of the overall community and stakeholder participation strategy. The matters discussed are summarised below (refer to **Table 15**) in accordance with the requirements of the SEARs. The information provided hereunder demonstrates that legitimate consultation has taken place to ensure that all stakeholders are informed, and the proposed development is considered with respect to their requirements.

Furthermore, consultation with adjoining landowners was chosen based on the proximity to the proposed development. **Figure 16** accurately illustrates a polygon determining whom was engaged with.

Additionally, stakeholders and adjoining landowners were issued with consultation letters, which summarise the proposed development from an informative perspective, allowing for any questions or issues that arose, to be dealt with respectively in an according manner. **Table 16** below details which landowners were liaised with. Further supporting the **Table 16** is **Table 17**, which subsequently identifies landowners (pursuant to a site visit) where photographs of the Subject Site were taken, which formed the basis of **Figures 3-7** and the photomontages that are also provided within **Appendix 9** that contribute to the comprehensive justification of the proposed development. **Table 17** also makes provisions for any objections that arose from the site visit. It is important to note, that in the first instance, identified adjoining landowners were contacted via phone. All identified adjoining landowners were then subsequently issued with a consultation letter (refer to **Appendix 18**).

The consultation letters provided to relevant entities / stakeholders and adjoining landowners constituted a two (2) week turn around time for a response to be received from either an applicable entity and / or adjoining landowner. **Table 15-17** below depict any responses received from various parties involved. It is important to note, that landowners were chosen because of the following conclusions drawn, including:

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- Proximity to the proposed development, i.e. directly adjoining and / or opposing the Subject Site; and,
- Any residential dwelling located in close proximity along Mamre Road, Mandalong Close and Luddenham Road.

Individual premises were not notified within Erskine Business Park besides the two (2) premises whom received consultation letters along Sarah Andrews Close, which directly oppose the proposed development. It can be noted that the industrial nature and character of surrounding industrial development further complements the proposed development; hence, notification to these industrial premises was considered unnecessary.

Furthermore, the land portion identified directly below the WaterNSW Pipeline is owned by Altis Property Partners and Frasers Property Australia. No objections were made in this respect.

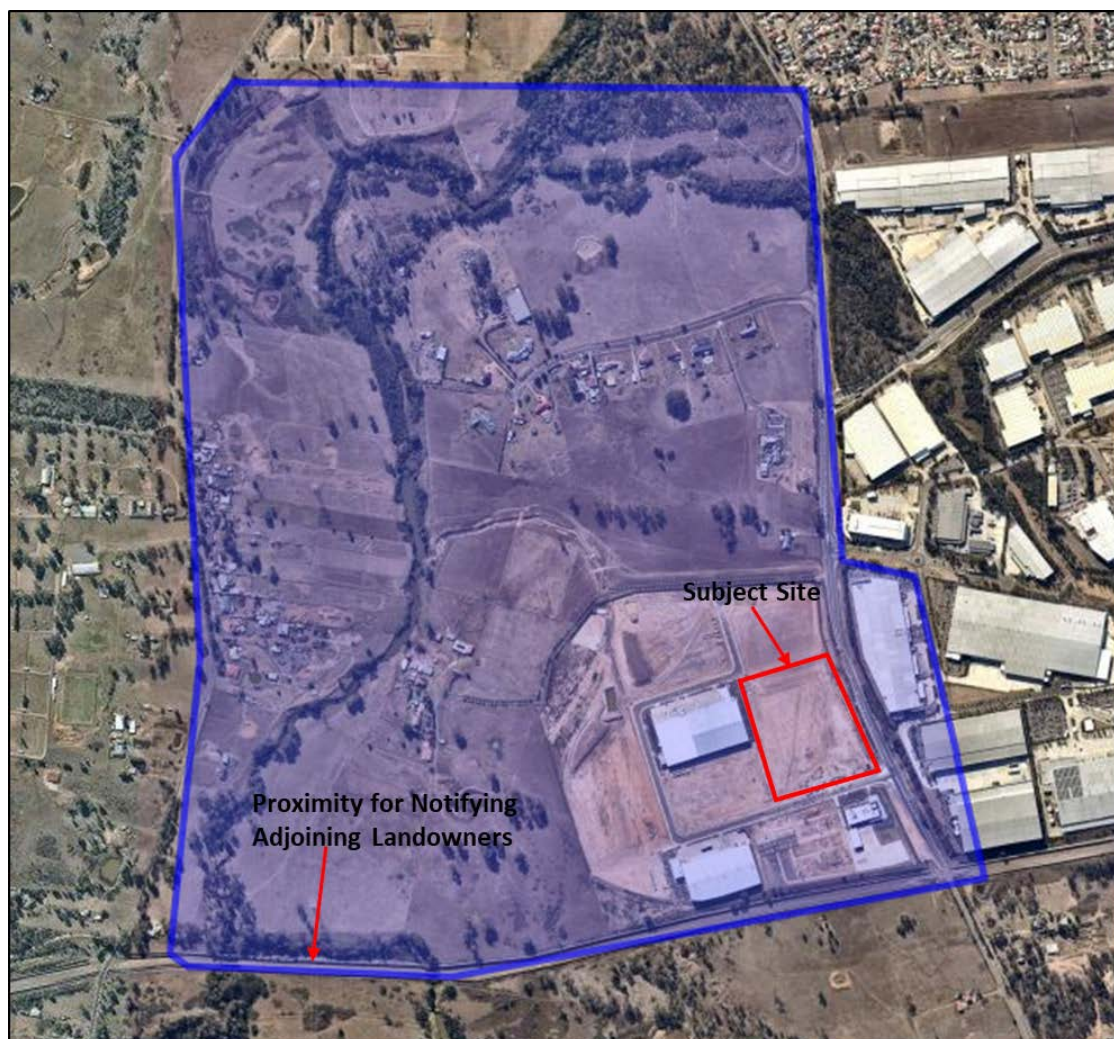


Figure 16 Proximity for which Landowners were Engaged for Consultation (NearMaps, 2018)

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Table 15: Consultation Record	
Stakeholder	Consultation Notes
Penrith City Council	<p>A Pre-DA (Pre-SEARs) Meeting was held at Penrith City Council on 28 June 2018.</p> <p>Attendees included:</p> <p>Visitors: Stephen O'Connor (Altis Property Partners); Andrew Cowan (Willowtree Planning); Kurt Beckhaus (HB&B Property); Craig Sims (Hansen Yuncken); Neville Tapp (Snack Brands); Richard Kaiser (Snack Brands).</p> <p>Council Officers: Robert Craig Wendy O'Connell</p> <p>The matters discussed at the meeting are further detailed in Appendix 2 and considered throughout this EIS in further detail.</p>
Roads and Maritime Services	No formal responses have been received at the time of finalizing this EIS pursuant to a consultation letter issued 27 July 2018; however, responses from RMS received as part of the SEARs (Table 15) are addressed accordingly throughout the contents of this EIS.
Transport for NSW	No formal responses have been received at the time of finalizing this EIS pursuant to a consultation letter issued 27 July 2018; however, responses from TfNSW received as part of the SEARs (Table 16) are addressed accordingly throughout the contents of this EIS.
Office of Environment & Heritage	No formal responses have been received at the time of finalizing this EIS pursuant to a consultation letter issued 27 July 2018; however, responses from OEH received as part of the SEARs (Table 14) are addressed accordingly throughout the contents of this EIS.
NSW Rural Fire Service	No formal responses have been received at the time of finalising this EIS pursuant to a consultation letter issued 3 August 2018.
Fire and Rescue NSW	No formal responses have been received at the time of finalising this EIS pursuant to a consultation letter issued 3 August 2018.

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WaterNSW	No formal responses have been received at the time of finalising this EIS pursuant to a consultation letter issued 27 July 2018.
Endeavour Energy	<ul style="list-style-type: none"> ▪ Consultation letter issued on 27 July 2018; ▪ Response received 30 July 2018, detailing that as part of the proposed development, it is a requirement to submit an enquiry for 'connection of load' or 'connection of load application', with the Contestable Works Section of Endeavour Energy. ▪ Response was forwarded to Craig Sims (Hansen Yuncken) and George Henien (HB&B Property).
NSW Office of Water	No formal responses have been received at the time of finalizing this EIS pursuant to a consultation letter issued 27 July 2018.
Sydney Water	<ul style="list-style-type: none"> ▪ Consultation letter issued on 27 July 2018; and, ▪ Response received 2 August 2018 informing that the consultation letter has been sent to Sydney Water's 'Liveable City Solutions' team for further investigation. ▪ Received phone call from a Paul Mulley (09/08) advising there are no comments to be provided by Sydney Water with regard to the proposed development.
Adjoining Landowners	<p>Consultation letters were draft and issued to the following adjoining landowners on 27 July 2018, including:</p> <ul style="list-style-type: none"> ▪ 21-23 Mandalong Close, Orchard Hills; ▪ 21a Mandalong Close, Orchard Hills; ▪ 35-44 Sarah Andrews Close, Erskine Park; ▪ 45-59 Sarah Andrews Close, Erskine Park; ▪ 573-577 Mamre Road, Orchard Hills; ▪ 579 Mamre Road, Orchard Hills; and, ▪ 579a Mamre Road, Orchard Hills. <p>Additional consultation letters were issued to landowners on 14 August 2018 (refer to Table 16).</p>

Table 16: Consultation Undertaken with Adjoining Landowners

Address	Letter Box Drop 14/8/18	Status	Contact Date
Mandalong Close, Orchard Hills			
1 Mandalong Close, Orchard Hills	Y	No Concerns	8/21/2018
21-23 Mandalong Close, Orchard Hills	Y	Not Contactable	N/A
21a Mandalong Close, Orchard Hills	Y	Not Contactable	N/A

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43 Mandalong Close, Orchard Hills	Y	Not Contactable	N/A
53-63 Mandalong Close, Orchard Hills	Y	Not Contactable	N/A
65 Mandalong Close, Orchard Hills	Y	not Yet Contacted	N/A
65a Mandalong Close, Orchard Hills	Y	not Yet Contacted	N/A
75-77 Mandalong Close, Orchard Hills	Y	Message Left	8/21/2018
79 Mandalong Close, Orchard Hills	Y	Message Left	8/21/2018
81 Mandalong Close, Orchard Hills	Y	Message Left	8/21/2018
83 Mandalong Close, Orchard Hills	Y	Message Left for Ron	8/21/2018
Luddenham Road, Orchard Hills			
182 Luddenham Rd, Orchard Hills	Y	No Concerns- Recently Sold	8/21/2018
202 Luddenham Rd, Orchard Hills	Y	No Concerns	8/21/2018
212- Luddenham Rd, Orchard Hills	Y	No Voicemail Box- Follow Up	8/21/2018
216 Luddenham Rd, Orchard Hills	Y	Message Left	8/21/2018
222 Luddenham Rd, Orchard Hills	Y	Not Contactable	N/A
226 Luddenham Rd, Orchard Hills	Y	Not Contactable	N/A
230 Luddenham Rd, Orchard Hills	Y	Not Yet Contacted	N/A
236 Luddenham Rd, Orchard Hills	Y	Message Left	8/21/2018
240 Luddenham Rd, Orchard Hills	Y	Not Yet Contacted	N/A
246 Luddenham Rd, Orchard Hills	Y	Not Contactable	N/A
250 Luddenham Rd, Orchard Hills	Y	Message Left	8/21/2018
256 Luddenham Rd, Orchard Hills	Y	Not Yet Contacted	N/A
262 Luddenham Rd, Orchard Hills	Y	No Concerns	8/21/2018
268 Luddenham Rd, Orchard Hills	Y	Not Contactable	N/A
320 Luddenham Rd, Orchard Hills	Y	Not Contactable	N/A
Mamre Road, Orchard Hills			

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573-577 Mamre Rd, Orchard Hills	Initial Mail Out	Message Left	8/21/2018
579 Mamre Rd, Orchard Hills	Initial Mail Out	N/A	N/A
579a Mamre Rd, Orchard Hills	Initial Mail Out	N/A	N/A
Sarah Andrews Close,			
35-44 Sarah Andrews Close	Initial Mail Out	Not Contactable	N/A
45-59 Sarah Andrews Close	Initial Mail Out	Not Contactable	N/A

Resident Address	Meeting Date	Items Discussed	Key Outcomes from Discussions
182 Luddenham Road	25/06/2018 10/07/2018	The owner / occupier was advised of the proposed high bay facility and purpose of the photographs and Visual Impact Assessment required. The owner / occupier gave access to backyard for photo shot. The general direction of the proposed development was identified to the owner / occupier. The owner advised they have sold the property and would be relocating in eight (8) weeks.	No objections raised.
43 Mandalong Close	25/06/2018 10/07/2018	The owner / occupier was advised of the proposed high bay facility and purpose of the photographs and Visual Impact Assessment required. The owner / occupier gave access to backyard for photo shot. The general direction of the proposed development was identified to the owner / occupier. The owner / occupier was generally satisfied with the explanation of the proposed development.	No objections raised.
226 Luddenham Road	25/06/2018 10/07/2018	The owner / occupier was advised of the proposed high bay facility and purpose of the photographs and Visual Impact Assessment required. The owner / occupier gave access to backyard for photo shot. The general direction of the proposed development was identified to the owner / occupier. The owner / occupier was generally satisfied with the explanation of the proposed development.	No objections raised.
Old Macdonalds Childcare Facility	25/06/2018 10/07/2018	The owner / occupier was advised of the proposed high bay facility and purpose of the photographs and Visual Impact	No objections raised.

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		Assessment required. The owner / occupier gave access to backyard for photo shot. The general direction of the proposed development was identified to the owner / occupier. The owner / occupier was generally satisfied with the explanation of the proposed development.	
Mandalong Stud Farm	25/06/2018 09/07/2018	The owner / occupier was advised of the proposed high bay facility and purpose of the photographs and Visual Impact Assessment required. The owner / occupier gave access to backyard for photo shot. The general direction of the proposed development was identified to the owner / occupier. The owner / occupier was generally satisfied with the explanation of the proposed development.	No objections raised.
425 Luddenham Road	10/07/2018	The owner / occupier was advised of the proposed high bay facility and purpose of the photographs and Visual Impact Assessment required. The owner / occupier was generally satisfied with the explanation of the proposed development.	No objections raised.
799 Mamre Road	09/07/2018	The owner / occupier was advised of the proposed high bay facility and purpose of the photographs and Visual Impact Assessment required. The owner / occupier gave access to backyard for photo shot. The general direction of the proposed development was identified to the owner / occupier. The owner / occupier was generally satisfied with the explanation of the proposed development.	No objections raised.
826-842 Mamre Road	10/07/2018	The owner / occupier was advised of the proposed high bay facility and purpose of the photographs and Visual Impact Assessment required. The owner / occupier gave access to backyard for photo shot. The general direction of the proposed development was identified to the owner / occupier. The owner / occupier was generally satisfied with the explanation of the proposed development.	N/A

PART F ENVIRONMENTAL RISK ASSESSMENT

6.1 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

The Secretary's Environmental Assessment Requirements were received on 2 August 2018. The Key Issues include:

- Strategic Context;
- Urban Design and Visual;
- Suitability of the Site;
- Community and Stakeholder Engagement;
- Soils and Water;
- Traffic and Transport;
- Noise and Vibration;
- Waste;
- Air Quality;
- Hazards and Risks;
- Bushfire and Incident Management;
- Biodiversity; and,
- Socio-Economic.

The above matters are addressed in the sections below.

6.2 STRATEGIC & STATUTORY CONTEXT

Refer to **Section 2.3** and **4.2** above with respect to the proposed development's strategic and statutory context.

6.3 URBAN DESIGN AND VISUAL

This part of the EIS takes into account the SEARs, specifically addressing the Urban Design and Visual assessment items, as-well-as addressing the design principles outlined in Clause 31 of SEPP WSEA. The design principles addressed are summarised below, including:

- *The development is of a high quality design;*
- *A variety of materials and external finishes for the external facades are incorporated;*
- *High quality landscaping is provided; and,*
- *The scale and character of the development is compatible with other employment-generating development in the precinct concerned.*

The layout and design of site features and built form have been considered in terms of the visual amenity of the estate and broader area in order to facilitate a positive visual outcome. Specifically, the visual impact of the proposal is informed by the following:

Site Layout including Landscaping

The proposed site layout has been designed to ensure the efficient use of the land and the functionality of the proposed Warehouse and Distribution Facility meet the operational requirements of the end-user (Snack Brands). The overall site layout is configured in a sense, to provide fluid access to and from the facilities provided on-site, whilst offering a sense of safety and continuity concerning circulation of vehicle and pedestrian movement on-site.

The precise siting of the various structures and hardstand areas of the Site including warehouses, offices, loading docks, car parks and landscaping, has been strategically coordinated to provide a functional layout and coherent visual outcome. Where feasible

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offices have been positioned and orientated to address the street frontage and loading docks located away from the street frontage.

Soft landscaping around the perimeter of the Site and in the building separation zones would soften the appearance of the built form and contribute to an attractive streetscape characterised by native vegetation planting and green verges. Vegetation planting would provide a natural buffer between the Site and surrounding allotments to define the separate warehouses and ensure views to and from the Site take in high quality landscaping. Additionally, setbacks allow for landscape buffer planting to help screen the proposed development and integrate the Site within its broader environment.

The estate road provides direct access from Mamre Road to identified car parking areas and applicable loading docks for the proposed warehouses (high bay and low bay). This has been designed in accordance with Australian Standards.

Furthermore, setbacks have been created along all three (3) boundaries which surround the proposed development site. These boundaries create landscape buffer zones that range in width from 4 m to 10 m. It is noted that a 3 m landscape buffer zone has also been proposed further north of the vacant land adjacent to the proposed development on Lot 7. This buffer zone is intended to create vegetative screening with regard to the northern aspect. With regard to the three (3) boundaries surrounding the Site and the buffer zone further north, the proposed landscaping aims to achieve two (2) main outcomes including:

- Screening of the development from nearby residential receptors and road users, with a mix of tall tree and shrub planting. Within all landscape buffer zones, trees are to be planted at a distance of 6m centres; and,
- Strengthen local character with the use of native and endemic species. These are to be selected predominantly from the Penrith City Council Native Plant Species List.

Landscaping is proposed to be interspersed throughout the Site, with regard to the internal buildings, carparks and surrounds, which would serve a number of aims and purposes including:

- A low water use, low maintenance approach with the use of native shrubs and grasses;
- Enhance the visual amenity when viewed within the estate, the streetscape and from surrounding properties;
- Provide planting that would reach a height of 20m at maturity;
- Provide a sufficient level of amenity for staff and visitors. Particular attention has been given to the car park areas by providing a density and scale of planting that would offer shade and visually separate the car park areas from the warehouse facilities;
- Ensure Crime Prevention Through Environmental Design (CEPTD) requirements are met (refer to **Section 6.5**);
- Use flowering deciduous tree planting around the office building and outdoor staff. This would help with wayfinding to the office building and provide solar access during the winter months and shade during summer; and,
- Ensure the long-term visual outcome sets a desirable precedent for future industrial development in the Precinct and the broader employment lands.

The intention is that all buildings, where possible, be provided a comprehensive landscape setting that integrates with the public domain. The design demonstrates linkage and continuity with tree planting themes and groupings of mass planted shrub and groundcover planting areas, swathes of native grasses and accent planting.

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The indicative species have been selected for hardiness, ease of maintenance and proven ability in the area and taking into consideration indigenous species, the Cumberland Plain Woodland and other ecological habitats and communities. Below describes the proposed landscaping characteristics of the Site's varied interfaces, including:

- **Mamre Road – Eastern Boundary**
 - A mix of endemic tall canopy trees are proposed to provide screening of the proposed warehousing facility. This is supplemented by mid-storey planting such as Acacia, Bursaria, Melaleuca and Hakea. Low level groundcovers would comprise grasses and creeping plants. The combined planting would create a dense vegetated screen, with an informal natural looking appearance, that blends the industrial character accordingly and further reduces the visual domination of the built form. This particular interface treatment is aimed at screening and softening views of First Estate from passers-by (vehicles and bicycles) along Mamre Road.
- **Distribution Drive – Southern Boundary**
 - The southern boundary landscape buffer zone is an average of 8 m in width. A similar approach is adopted to that of the eastern buffer (mentioned above) with regard to canopy tree planting, mid storey shrubs and ground covers used. This buffer is intended to screen the proposed low bay warehouse and aid in softening the overall visual impact imposed by the proposed high bay warehouse. This would help reduce the scale of the proposed high bay and reduce impacts from potential visual receivers further to the south. It is noted that existing street planting along Distribution Drive will provide another added layer of landscape vegetation.
- **Western Boundary**
 - The western landscape zone is 4 m wide, which would allow for tree and shrub planting. This would provide a visual break from the adjacent future buildings proposed on the adjacent lots within First Estate. The vacant land identified on Lot 7 is expected to continue this proposed landscape treatment along the western boundary.
- **Northern Boundary**
 - Directly to the north of proposed facility is the 6 m wide fire trail within the vacant land adjacent to the proposed developmental site; therefore, a future buffer zone is proposed to the north of the vacant land. This will in turn provide screening for the proposed Warehouse and Distribution Facility including the proposed high bay component. It would comprise of the same species mix as is proposed for all other buffer zones and would help to screen the development from visual receptors further to the north, including the Old Macdonald's Child Care Centre.

Furthermore, the large scale of the open space areas requires an appropriate large-scale response to broad groupings of densely planted gardens that generally give an impact as a single mass of sculpted foliage. The canopy of trees across the Site is to have strong groupings and lines to reinforce the continuity of character.

The Landscape Plan and Landscape Design Report are annexed to this EIS at **Appendix 7 & 8** which include a range of endemic and exotic species selections. It is considered that the species selected are suitable for the soil and climatic conditions and would therefore serve the intended purpose addressing the landscaping aims as addressed above.

Design of Built Form

The proposed built form incorporates high quality design and fabric to ensure a positive visual outcome and sustainable development.

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The bulk and scale of the proposed built form is typical of similar warehousing facilities throughout the WSEA and is therefore considered highly appropriate for the Site. The proposed warehouse buildings exhibit a consistent design which would be reflected throughout the broader area upon the development of additional land in direct proximity of the Site. Future development would further blend and complement the nature of the proposed high bay component.

The positioning of the built-form is central and on the eastern side of First Estate. This allows for future warehouses to the west within First Estate to break down the height of the high bay warehouse accordingly. Proposed planting along Mamre Road and Distribution Drive would help create another buffer level to help conceal and reduce the scale of the proposed development.

The proposed building bulk and scale would not cause any undesirable visual impact, view obstruction, privacy intrusion or loss of solar access owing to the provision of adequate setbacks, building separation and deep-soil landscaping. It is noted that the high bay warehouse would ascertain a height of approximately 36.0 m; however, the pertained height in contrast to the overall site area amounts to only 37%, which would be further justified by the architecturally pleasing design, maintaining the aesthetic quality of First Estate.

The proposed development would be expressed in simple volumetric forms, which would display the functional aspect of the Site operations, reflecting flexibility for any future expansion intended. The hardstand zone is located at the Western side of the building, which is a function of the operation of the building.

Complementing this is a generous 32 m wide canopy offering protection from the weather, which defines the western elevation along with the protruding dock office between the on-grade and recessed docks, that facilitate overall access and functionality of the hardstand area.

The proposed office was also considered, which is situated on Mamre Road between the proposed high bay component and the warehouses' built form, which has been considered in a response to the overall length of the façade along the main street frontage, by creating varied elements and breaks in the façade that are interesting and aesthetically pleasing.

The proposed site layout has been designed to address the street frontage through the positioning and orientation of offices at the forefront of the Site where feasible. This would provide additional façade articulation as-well-as opportunities for passive surveillance of the street and car park in accordance with the principles of CPTED. To a similar effect loading and service areas have been located away from the street frontage and naturally screened by vegetation to mitigate an adverse visual impact.

Additionally, the functionality of building type is architecturally articulated through language of simple contrast, with the solid volume of warehouse space fronting the corner of Mamre Road and Distribution Drive. Façade articulation incorporated in warehouse design through a complementary variety of materials, colours design features and openings would create visual interest and prevent the presentation of large expanses of blank wall with positive connotations for views toward the Site.

Height, Scale, Materials and Colours

The proposed development for Snack Brands, particularly the *Architectural Design Statement* (Nettleton Tribe, 2018), addresses three (3) desirable options (refer to **Appendix 18**), taking into consideration the bulk and scale of the proposed development. The preferred concept – Option 2 (refer to **Figure 17**), consists of a breakup of horizontal layers creating a protruded ribbon effect in earthy tones. The horizontal layering has been used to subtly address the

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functional height of the building, whilst using lighter and neutral tones of colour in the materials.



Figure 17 Preliminary Concept Option 2 (Nettleton Tribe, 2018)

Traditional building heights exhibiting 13.7 m with sheet metal cladding wrapping the vertical surfaces in varying neutral tones are complemented with a solid painted precast base wrap around to the southern and western facades.

The proposed high bay component is located at the corner of the Site between Mamre Road and Distribution Drive that accommodates a ridge height of 36.8 m above the ground level below. The articulation of the façade takes on a ribbon effect to breakdown the overall height of the proposed high bay element, where a change in colour and folding façade breakup elements occur. Here colour and material direction are used to blend with the architectural forms and large format panels at low levels on the corner, provide a commercial façade to the Estate entry. Additionally, the use of translucent façade sheeting to the warehouse component fronting Mamre Road is to create visual interest and allow natural light to transmit into the warehouse area.

The associated office components located on the eastern façade with detailed design elements, are responsive to site environmental conditions by the use of various complementary volumetric shapes and materials, conducive to transparency of function and response to sustainable building practices.

The journey on the office takes you from the cantilevered roof element and fully glazed eastern façade, that links to the folding façade element and use of the translucent wall sheeting of the warehouse above, these are in turn separated with glazing and timber look panelling. The timber panelling is drawn from the façade spandrel element to highlight the main entry to the building. Vertical blades and protruding façade elements are used to shade the glazed façade elements. The northern office façade creates a recessed façade by overhanging the roof beyond the external wall and maintains the roof and façade slope to create weather protection to the recreation area at ground level.

Further reinforcing the architectural design statement, the *Landscape and Visual Impact Assessment Report* (Geoscapes, 2018) based the potential visual impact on visual receptors that were perceived to potentially have the highest sensitivity to the proposed development.

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These viewpoints were selected via consultation with Penrith City Council on 29 June 2018, including:

- 182 Luddenham Road;
- 43 Mandalong Road;
- 226 Luddenham Road;
- Old Macdonald's Child Care Centre;
- 573 Mamre Road;
- Mandalong Stud Farm;
- 676 Mamre Road;
- Catholic Healthcare Emmaus Village;
- 657 Mamre Road;
- 707A Bakers Lane;
- Mamre Anglican School;
- 706-752 Bakers Lane;
- Emmaus Catholic College;
- 26 Medinah Avenue, Twin Creeks;
- 799 Mamre Road;
- 826-842 Mamre Road; and,
- 864 Mamre Road.

Receptors that were regarded as having less sensitivity but were also assessed included:

- 5 Benaud Circuit, St Clair;
- Walkers Lane Public Reserve, St Clair;
- Dogs NSW, Luddenham Road;
- Public Reserve Near Coowarra Drive, St Clair;
- Driving Approach to Site from Mamre Road; and,
- 425 Luddenham Road.

The Report notes, that the Site is partially screened to the north and west by existing vegetation along South Creek. Properties located in St Clair are situated behind the existing Erskine Business Park, for which blocks views to the proposed development. Additionally, the suburbs of Mount Vernon, Horsley Park, Kemps Creek and parts of Orchard Hills were considered to be too far from the development to experience any adverse visual impacts. A view of the development may be made possible from areas on the perimeter of the Blue Mountains; however, this is located approximately 12 km away from the proposed development, hence the visual impact from this identified vantage point is considered to be negligible.

In recent years there has been an increase in the number of proposed industrial warehouse developments comprising of high bay components. This can be pinpointed to the increase in productivity that these particular developments can offer in terms of delivering an enhanced high-quality and efficient output by enabling a high bay component. Examples of high bay warehouses are as follows, including:

- The IKEA Distribution Centre – located 13 km north east of the proposed development, which was completed in May 2017. It was granted approval by the NSW DP&E on the 3 May 2016, with SEARs issued in April 2015, constituting the requirement for an EIS, forming similar components and warranted justifications to the likes of this EIS for the proposed development for Snack Brands. The development comprised a high bay component pertaining a ridge height of approximately 34.7 m. The IKEA multi-function logistics unit is considered to be a prominent element in the Marsden Park landscape and number of residential suburbs and associated properties experience views of it;

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- Swire Cold Storage Warehouse and Distribution Facility – located in Marsden Park, was approved by NSW DP&E in July 2016. This contains a high bay component attaining a ridge height of approximately 34.8 m; and,
- Hollinsworth Road Industrial Estate is currently under determination by the NSW DP&E, Geoscapes prepared the visual impact assessment for this project, which comprises a high bay component of up to 18 m.

The Report explains that there are current statutory designations within SEPP WSEA and the Mamre West Precinct Development Control Plan that hold connotations to managing the attributing landscape and / or environmental value to the Site. The current character of the surrounding landscape is described as being heavily influenced by industrial and commercial development, which ultimately reinforces the objectives of SEPP WSEA, alike with that offered by the proposed development.

Previous to the development of First Estate, the land was associated with agricultural use; therefore, the original landscape and status of the Site is considered to have been previously modified by 'man made intervention'. Notwithstanding, a significant local value may be held by a few visual receptors that overlook the Site out onto the current landscape or to the views of the distant Blue Mountains from notable elevated positions. This would be somewhat applicable to the following premises, including:

- 425 Luddenham Road;
- 706-752 Bakers Lane;
- Emmaus Catholic College;
- Some properties within the suburb of Twin Creeks;
- Twin Creeks Golf and Country Club; and,
- Residential properties to the south located along Mamre Road.

It is important to note, that this identified viewpoint for the listed premises would be placed on the view beyond the Site rather than the views on the Subject Site itself. Reinforcing this characteristic are several industrial and commercial developments that have been built and are currently under construction within First Estate. This component is further complemented by the existing industrial and commercial surroundings to the east of the Site towards Erskine Business Park.

As previously suggested, many tall canopy trees would be planted within all designated landscape areas. Almost all planting within the development is proposed to be native with a substantial proportion of endemic species too. This would ultimately increase the vegetated area and surrounds of the Site from the existing condition. Conclusions drawn from the landscape assessment and the above analysis indicate that the Site would suggest the sensitivity of the landscape to be considered 'very low'².

The design concept for the proposed development was based on a vision to provide quality functional building design solutions, that respond to the Site and wider surroundings accordingly, by providing a flexible working environment appropriate for end users and visitors alike, relevant to the current nature of industrial development practices.

As mentioned in **Section 3.5** of this EIS, First Estate, particularly the Subject Site (Lot 7) was chosen by Snack Brands as it would be able to accommodate the proposed development, as-well-as any future developments proposed, via means of expansion. The Site's locality is considered satisfactory from a geotechnical standpoint concerning the potential to house a high bay warehouse, which requires very precise levels.

² Very Low – View affected by many landscape detractors and unlikely to be valued. People at their place of work or other locations where the views of the wider landscape have little or no importance.

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Enabling a high bay component would accommodate provisions to allow for an Automated Storage and Retrieval System (ASRS) to be installed (refer to **Appendix 5**), which would be located within the high bay warehouse. This system would operate to its optimum potential, delivering high quality outputs, whilst maintaining an efficient operation. Additionally, the Site's locality is reinforced by its close proximity to nearby regional road networks such as the M4 & M7 Motorways, which is deemed critical to minimising the freight costs associated with interstate distribution to relevant customers.

By implementing ASRS into the desired operational business model, this would provide the high-density storage required by Snack Brands, whilst maintaining a cost effective and efficient logistics operation. Furthermore, enabling a high-density racking area, for which the ASRS would work parallel with, would maximise the overall pallet storage on a given footprint (juxtaposed to a low bay warehouse). This would be further reinforced by the proposed ASRS, which would subsidise necessary costs, and as a result complement an efficient and high-speed high bay warehouse rather than a low bay warehouse, which would exhibit a higher cost due to the increased demand for machinery.

Operationally, the proposed high bay warehouse (11,025 m²) would pertain a proposed height of 36.0 m, which would attribute to approximately 37% of the proposed built-form of the Site. As mentioned, the proposed high bay warehouse would make provisions for ASRS, which would include 12 automated cranes and high-density racking for approximately 50,000 pallet spaces. Palletised goods would then be automatically loaded onto trucks that are in the corresponding loading bays to their associated racking. Contrasted to this, is the proposed low bay warehouse, which would be for staging, truck loading, 'part-pallet picking' and some formalised packing operations.

The Visual Impact Assessment concludes by stating and justifying that it is evident that the proposed high-bay component will be potentially visible from several locations, not only in the immediate vicinity but also at further distances from the Site. In the north, the suburb of St Clair is generally screened from the proposed development due to existing warehousing in the Erskine Business Park Industrial Estate or by existing vegetation; however, some residential dwelling may experience mid range views of the top of the proposed high bay component. This would only be a small component of their view.

It is important to note that there are not any densely populated suburbs to the south of the proposed high bay. The south and west aspects present the most open views of the proposed development; however, there is a large prominence of agricultural farm land with only a small number of associated dwellings that are scattered throughout the landscape.

Additionally, as stipulated within **Section 3.5**, if the proposed development was to comprise of low bay warehouses only, the intended business model / case would not be able to be executed accordingly.

Land Use Conflict

The Subject Site is within a precinct that has been the subject of a proponent led rezoning, which sought to rezone the land (Mamre West Precinct) to General Industrial (IN1). The Site is also within immediate proximity of the WSEA land application. Accordingly, the Site context may be described as part of an emerging industrial precinct, which the proposed Warehouse and Distribution Facility would positively contribute to. Given the future industrial character of the site's surrounds no land use conflict is expected to occur. This is compounded by the strategic siting and design of the proposed warehouses in close regard, access roads and other site features.

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There are a range of land uses which surround the Subject Site, all of which have been given due consideration in the design of the Estate. Of particular relevance, the following land uses are noted within the vicinity of the Site:

- **East** - Erskine Business Park which contains various warehouse/logistics and industrial facilities that operate on a 24-hour, 7-day basis including CEVA Logistics, CSR, Woolworths and Alvaro Transport. Due consideration has been given to this industrial estate and the existing/future planned land uses. The separation between Erskine Business Park and the Subject Site ensures that a suitable level of visual amenity would be retained along Mamre Road and that operations can co-exist, with vehicle movements on a daily basis able to operate successfully.

Further to the east there are a range of other land uses comprising Mamre Anglican School, Emmaus Catholic College, and the Catholic Healthcare retirement living community. It is considered that the separation distance between the Subject Site and the above land uses would be sufficient to ensure there would not be any unacceptable, visual, noise, air or traffic impacts.

- **North** – Old McDonald Child Centre. The proposed development seeks to retain a substantial buffer to this existing child care centre which would ensure that the visual, acoustic, air and odour impacts are acceptable. Noise modelling carried out indicates that compliance would be achieved with the EPA criteria and the two (2) land uses could co-exist. Beyond the child care centre is rural residential development which does not afford a direct interface with the Subject Site.
- **South** – Rural Residential development is located to the south, which is sufficiently separated from the proposed development. The WaterNSW Pipeline segregates the Subject Site and the privately owned land to south.
- **West** – Located to the west of the Site is existing rural residential development which is setback from proposed Lot 1 and Lot 5 (within First Estate) in excess of 150m. Future warehouse facilities on Lot 5 may need to be orientated to screen noise within the Estate and be designed so that they are aesthetically acceptable. Furthermore, directly adjacent to the Subject Site, lays the existing Lot 8B, which further compliments the built-form and characteristics of the proposed development. In combination with substantial setbacks and suitable materials and colours, the overall impact on these properties would be acceptable.

In terms of the public domain, Mamre Road is the main vantage point which affords a direct view to the Site. This road presently has limited capacity for pedestrian movement and experiences relatively low traffic volumes. Vehicles passing the Site would afford a direct view of the proposed Warehouse and Distribution Facility; however, given the proposed architectural articulation and deep soil landscaping, the visual impact would be considered acceptable.

It is noted in the Noise Impact Assessment (**Appendix 13**), that the following recommendations must be adhered to accordingly prior to the issuance of a Construction Certificate, including:

- Between 10 pm and 7 am – it is assumed that there would not be more than two (2) truck movement to the Site in a 15-minute period;
- Trucks with tonal reversing beacons are not recommended in external areas on the Site;
- If a diesel forklift is required for the purpose of large container movement, it is recommended that this only occur between the hours of 7am-10pm. This restriction applies only until the acquisition of 573-577 Mamre Road.

Geotechnical Assessment

Geotechnical assessment was carried out as part of SSD 7173. No geotechnical or topographic constraints have been identified that would preclude or restrict the proposed development on the Subject Site. As mentioned above, the geotechnical aspect is considered to satisfactorily address the levels required to house a high bay component.

Development Control Plan

The Mamre West Precinct DCP is addressed in **Section 4.4.3** above, having regard to the specific controls which apply, and the level of compliance achieved with regard to the proposed development. As noted in **Section 4.4.3**, there are no numerical non-compliances with the proposed development – despite the increased height, which has been strategically justified; therefore, the subject scheme is considered consistent with the objectives of the DCP which are:

- *To integrate State and local planning inputs to enable the delivery of environmentally, economic and socially sustainable development.*
- *To provide suitably located industrial land to support the economic growth of the city.*
- *To provide connections to required services to meet the future needs of the Precinct.*
- *To facilitate development that is integrated with local road and freight networks.*

Surrounding Vehicular, Pedestrian and Cycling Networks

The existing transportation routes are best illustrated below in **Figure 18**. Notwithstanding, it is evident that the Site is not directly serviced by frequent public transport operations at this time; however, with regard to this, the opportunities to accommodate for future connections are discussed below.

Connotative opportunities for a future bus service explore the possibilities to extend the 799 bus route to include stops within the future internal road network of the Site. The route proposed, provides a significant connection to the St Mary's railway station and to the broader transport network.

Furthermore, it is noted that there are existing opportunities and infrastructure for cyclists to access the Site via Mamre Road. Bicycle lanes are provided along Erskine Park Road and some sections of Mamre Road, as-well-as as some carriageway shoulders that could also be utilised by cyclists. As the same with bus routes, there is potential to improve cycling infrastructure through the provision of shared paths along Mamre Road fronting the Site that could be connected to paths along Erskine Park Road.

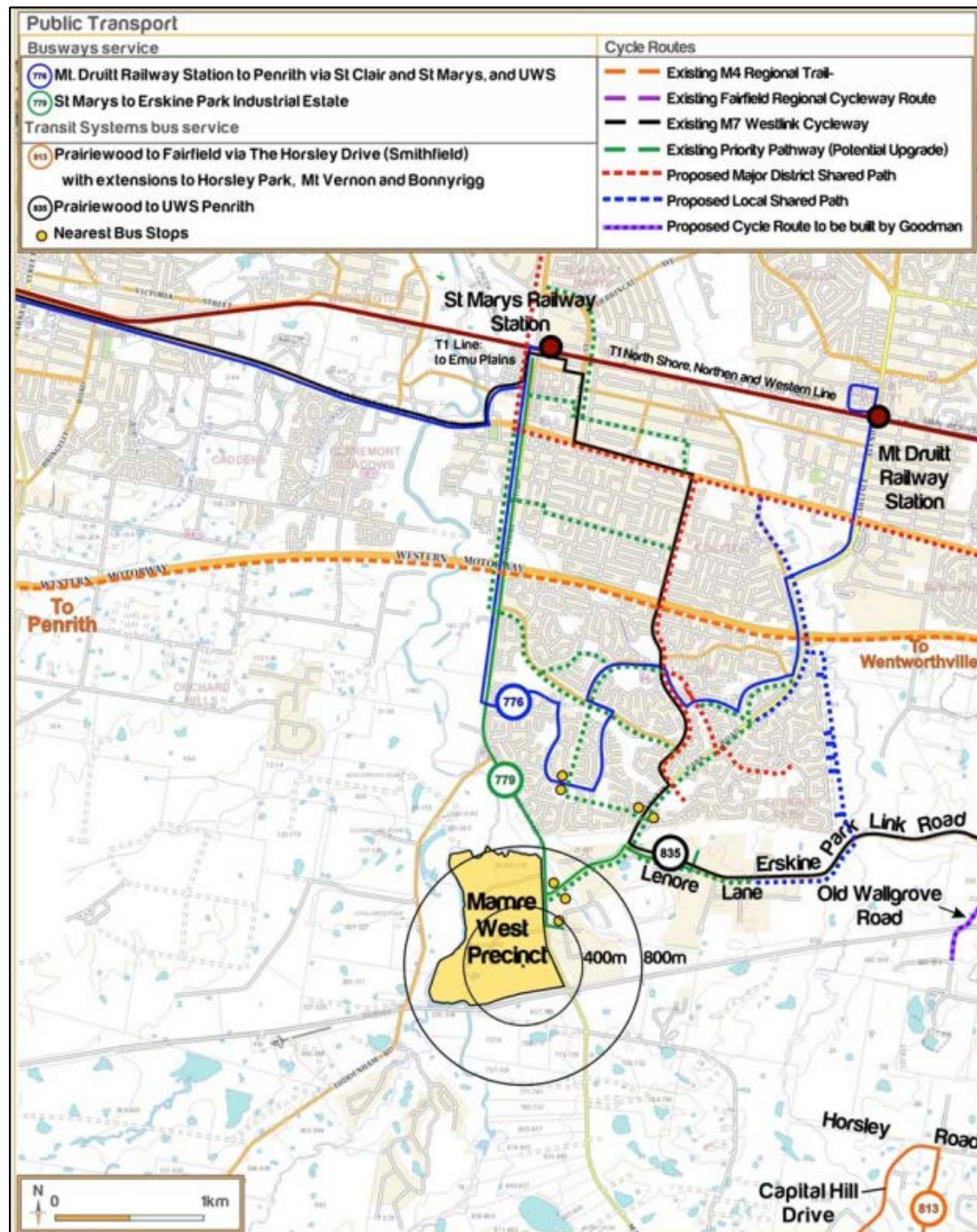


Figure 18 Public Transport Services and Cycling Routes (Ason Group, 2018)

Signage

Section 4.2.10 accurately examines proposed signage with regard to the proposed development, complying with SEPP 64.

Additionally, signage would be considered on an estate wide basis, such that there would be consistency in materials and finishes of the signs throughout First Estate. Signage would be a combination of building mounted signage for individual buildings and tenant identification signage notable in landscape setbacks positioned along Distribution Drive at both driveway and building entry points. Signage would ensure added placemaking and wayfinding

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principles concerning safety and user experience are adhered to accordingly for not only the proposed development, but First Estate too.

Lighting

Lighting would be provided with a combination of light poles and building mounted lighting around the Site for on-site security and safety. Lighting would be strategically positioned to shine inward towards the proposed development to minimise any anticipated light spillage onto adjoining properties. The layout of the buildings, internal roads and loading areas would ensure that neighbouring properties would not be affected by light spillage.

6.4 SAFETY, SECURITY AND CRIME PREVENTION

The principles of Crime Prevention Through Environmental Design (CPTED) have been considered in the design of the proposed development.

The CPTED guidelines were prepared by the NSW Police in conjunction with NSW DP&E. CPTED provides a clear approach to crime prevention and focuses on the 'planning, design and structure of cities and neighbourhoods'. The main aim of the policy is to:

- Limit opportunities for crime;
- Manage space to create a safe environment through common ownership and encouraging the general public to become active guardians; and,
- Increase the perceived risk involved in committing crime.

The guidelines provide four (4) key principles to limit crime, including:

- Natural Surveillance;
- Access Control;
- Territorial Reinforcement; and,
- Space Management.

Principle 1 – Surveillance:

The attractiveness of crime targets can be reduced by providing opportunities for effective surveillance, both natural and technical.

- The proposed development would orientate active areas such as the ancillary offices and building entrances towards surrounding roads, pedestrian paths, car parking areas and deep-soil landscaping. Lot 7 comprises of ancillary offices;
- The proposed development would utilise low lying landscaping in appropriate locations to ensure there would be no obstruction of surveillance opportunities; and,
- External lighting would enable the maintenance of sight-lines and surveillance after dark.

Principle 2 – Access Control

Access Control can be defined as physical and symbolic barriers that are used to 'attract, channel or restrict the movement of people'.

- The Site would be secured by perimeter fencing and access gates to deter unauthorised access to the Site; and,
- Directional signage to heavy vehicle, car parking, pedestrian paths and building entries would define the various areas of the Site, providing legibility and minimising vehicular and pedestrian conflict with the Site.

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Principle 3 – Territorial Reinforcement

Territorial Reinforcement can be described as creating a sense of ownership to a public space or vicinity, encouraging the usage of that space. By increasing usage capability, this also deters crimes and further increases the chances of a crime being witnessed and reported in a timely manner.

- The provision of security-controlled entrances to the Site and proposed warehouse(s) would emphasise the separation between the private and public domain; and,
- Well maintained landscape design would indicate the proposed development is well-used and cared for to reduce criminal activity.

Principle 4 – Space Management

Space Management is intuitive of Principle 3 – Territorial Reinforcement – and, refers to ensuring a space is utilised and cared for appropriately.

- On the ground level, pathways and planters would be well maintained by a landscape contractor. Continued repairs and maintenance would discourage vandalism; and,
- High quality materials, varied façade treatments and landscaping along boundaries would assist in discouraging vandalism and graffiti.

The proposed development would successfully integrate the four (4) principles outlined to limit crime outlined in the CPTED guidelines, which are adopted into the PDCP2014.

6.5 SOILS AND WATER

The *Water Sensitive Urban Design Report – Lot 7, 585-649 Mamre Road, Orchard Hills, NSW, 2748* (Sparks + Partners, 2018) was provided, which assessed the overall stormwater management, water quantity management, stormwater quality controls and erosion & sediment controls plans concerning the proposed development (refer to **Appendix 10**).

Stormwater

The Water Sensitive Urban Design (WSUD) strategy that has been prepared with regard to the proposed development for Snack Brands, takes into consideration the objectives and controls under the PDCP2014 Part C3-Water Management, and the Mamre West Precinct DCP, Section 5-Stormwater and Flooding (Urbis). Additionally, runoff from buildings would generally be designed in accordance with AS 3500.3; and, overall site runoff and stormwater management would be generally designed in accordance with the Institution of Engineers, Australia publication "Australian Rainfall and Runoff" (1987 Edition), Volumes 1 and 2 (AR&R).

Regarding drainage for the Site, the proposed stormwater drainage system for the development would comprise a minor and major system to safely and efficiently carry collected stormwater runoff from the proposed development to a defined point of discharge, noting that discharge points were previously assessed and implemented throughout approved SSD 7173 for First Estate.

Stormwater quality controls were previously assessed and provided as part of the Civil Engineering Report (CostinRoe Consulting), annexed as part of previously approved SSD 7173. The Report mentioned, explains that developed impervious areas including roof, hardstand, car parking, roads and other extensive impervious areas are required to be treated by the Stormwater Treatment Measures (STMs). For contextual purposes, components of the treatment process for First Estate are considered transparent with regard to the proposed development for Snack Brands, including:

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- *Primary treatment will be made via the proprietary vortech style GPT. The GPT is located immediately prior to the discharge from the estate infrastructure system into the detention / water quality basin. This pre-treatment of stormwater will assist in mitigating the potential for early onset sedimentation of the bio-retention system;*
- *Tertiary treatment is to be performed via a 4,000 m² estate bio-retention system; and,*
- *A portion of the future building roof will also provide a level of treatment via rainwater reuse and settlement within rainwater tanks (however not included in the approved estate MUSIC model).*

The stormwater management strategy implemented as part of SSD 7173 for First Estate means that no additional stormwater treatment requirements are considered necessary for development lots, as all measures were provided at the initial development level for First Estate. With this in mind, there are no provisions proposed for water quality with regard to the proposed development.

Rainwater

Although there are no provisions concerning water quality requiring adherence, there are however requirements concerning rainwater harvesting with regard to the proposed development, with the overall aim and intention to reduce overall demand by provided re-use for non-potable applications. Internal uses include such applications as toilet flushing, while external applications would be used for irrigation. Proposed rainwater harvesting systems are expected to generally comprise of an in-line tank for the collection and storage of rainwater / stormwater. It is important to note, that when the rainwater storage tank is full, rainwater can pass through the tank and continue to be discharge via gravity into the stormwater drainage system. Rainwater from the storage tank would be pumped for distribution throughout the proposed development in a dedicated non-potable water reticulation system.

Water usage reduction is to be achieved throughout the proposed development via the use of a minimum of 4 Star WELS rated water fixtures and rainwater reuse in accordance with the performance criteria under Section 3.1 Water Conservation of the Penrith City Council WSUD Policy, December 2013 and Section 5.4 of the Mamre West Precinct DCP as mentioned at the beginning of **Section 6.5** of this EIS.

The proposed development exhibits a catchment area of 2,900 m², for which, it would capture roof water portions from the roof area. Any roof water collected would be discharged to a 50 kL rainwater tank (integrated as part of the proposed development) and would be used for storage and reuse purposes as part of the proposed development. A water balance model (MUSIC) was utilised to capture projected volumes for the proposed development, including:

- Penrith City Council MUSICLink files;
- Non-potable reuse demand based on:
 - Eight (8) toilets and urinals each using 0.1 kL/day for six (6) days of the week (0.69 kL/day);
 - 1,000 m² of irrigated area at 0.3 kL/year/m² (300 kL/yr); and,
- Effective rainwater tank volume 40,000 kL.

Given the above data, the rainwater tanks proposed are expected to contain an approximate efficiency of 82% resulting in an approximate reduction in the demand on potable water supplies of 450,000 L per year. It is noted, that the efficiency rating project adheres to the minimum 80% requirement in accordance with the performance criteria under Section 3.1 Water Conservation of the Penrith City Council WSUD Policy, December 2013 and Section 5.4 of the Mamre West Precinct DCP.

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Erosion and Sediment Control

During the construction phase, a Sediment and Erosion Control Plan would be in place to ensure the downstream drainage system and receiving waters are protected from sediment laden runoff. Measures prescribed would include erosion control, pollution control, waste management, site inspection and maintenance. The control measures specified would be implemented in the relevant phases of the proposed development to prevent any adverse impacts from occurring as a result of the carrying out of the proposed works. Furthermore, the specified control plan can be found in further detail in the drawings provided in **Appendix 10**.

Flooding

Detailed flood modelling was previously undertaken as part of the studies for SSD 7173 concerning First Estate. **Figure 19** below has been extracted from the CostinRoe Consulting Flood Report, which demonstrates and depicts that the Site is located outside of the flood zone. The flood level for 1% AEP flood event adjacent to the Site has been determined to be approximately 33.000-33.500 AHD. The flood level described is below the proposed floor level of 36.450 AHD, attaining approximately 3.0 m of freeboard for the proposed development.

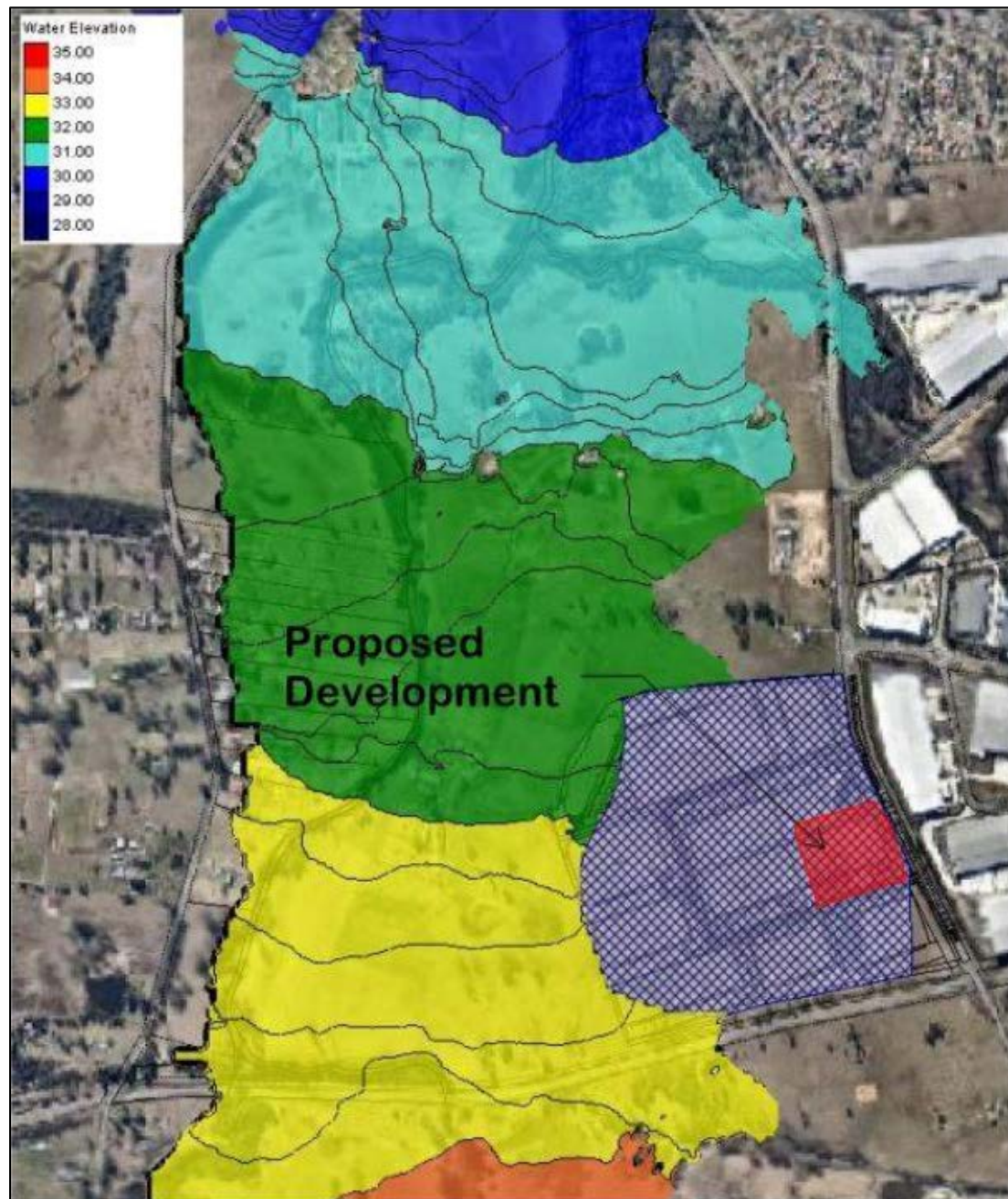


Figure 19 Flood Model from CostinRoe Consulting Report Provided for First Estate in SSD 7173 (Sparks + Partners, 2018)

6.6 TRAFFIC AND TRANSPORT

The *Traffic Impact Assessment: Proposed Warehouse Development – Lot 7 – First Estate, Mamre West Precinct* (Ason Group, 2018) considered the potential traffic impacts of the proposed development (refer to **Appendix 11**).

The Site has frontages to Mamre Road (sub-arterial road) to the east. Nearby key roads include (refer to **Figure 20**):

- M4 Motorway – Arterial Road;
- M7 Motorway – Arterial Road;
- Elizabeth Drive – Arterial Road;

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- Erskine Park Road – Sub-Arterial Road;
- Lenore Drive – Collector Road; and,
- Luddenham Road – Collector Road.

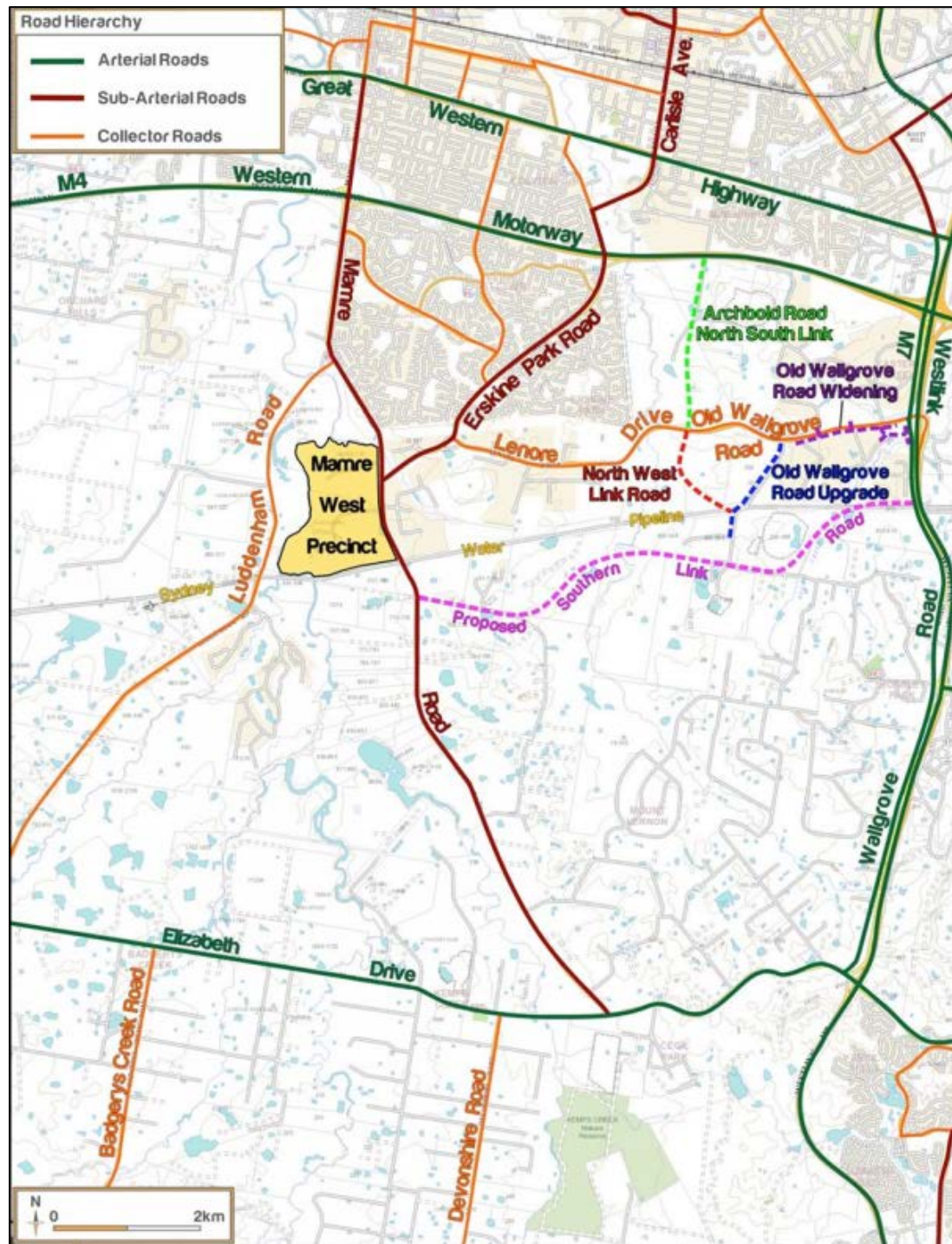


Figure 20 Road Hierarchy (Ason Group, 2018)

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Access to the Site is proposed via several vehicular crossings to the internal estate roads, which encompass a 20.6 m road width (as per the Mamre West DCP), with the primary access to First Estate to be provided via a new western connection to the existing signalised T-intersection off Mamre Road with James Erskine Drive; and, secondary access to be provided via a left-in / left-out priority controlled intersection with Mamre Road located approximately 500 m south of the James Erskine Drive intersection. In the interim between the primary access being formally provided, a temporary signalized intersection is provided in the location of the future secondary access intersection to service First Estate accordingly.

From an operational standpoint, it is anticipated that identified commercial vehicles such as B-doubles (and other smaller vehicles) would enter Lot 7 via the western access driveway to access the hardstand area. It is noted, that sufficient hardstand is provided for vehicles to a make a 'u-turn' on-site. Additionally, the car parking area has been designed accordingly to be accessed by cars and other light passenger vehicles.

With primary and secondary (interim) access points described above, it is important to note that SIDRA modelling previously conducted demonstrates that the proposed interim access (signalised intersection) is expected to operate with a Level of Service 'B'³ during both the morning and evening peak periods. With this in mind, the interim signalised intersection to Mamre Road would adequately accommodate the anticipated traffic generated by the First Estate Master Plan as proposed under SSD 7173.

The Traffic Impact Assessment (TIA) Report has adopted trip rate assumptions from the RMS Technical Direction (guide for surveys of industrial precincts across Sydney), which formulated rates with respect to approved SSD 7173, based on analytical data observed on the adjacent Erskine Business Park. With reference, the proposed development is generally consistent with that assessed under the Master Plan provided with approved SSD 7173. The Report suggests, that Lot 7 would generate less than that originally adopted than the previously approved Master Plan under SSD 7173. Future peak hourly traffic volumes associated Lot 7 would include:

- AM Peak – 41 vehicles per hour;
- PM Peak – 42 vehicles per hour; and,
- Daily – 572 vehicles per day.

These figures include both staff vehicles (cars) and commercial vehicles (trucks). It is understood that the proposed facility is to be operated by Snack Brands, with the following operational details relevant to traffic, including:

- 24/7 operational hours;
- Up to 87 employees at any given time;
- Approximately 124 trucks (248 movements) per day, comprising the following daily movements:
 - Inbound receivables:
 - 100 x B-Doubles (50 in, 50 out);
 - 10 x 40-foot containers (semi-trailers) (5 in, 5 out).
 - Outbound deliverables:
 - 128 x B-Doubles (64 in, 64 out);
 - 10 x 40-foot containers (semi-trailers) (5 in, 5 out).

Based on the operational details provided, Snack Brands, as a tenant are expected to generate in the order of 422 vehicle movements per day, comprising:

³ Level of Service B refers to average delay per vehicle (secs/veh) between 15 to 28; traffic signals, roundabout described as 'good with acceptable delays & spare capacity'; and, give way and stop signs described as 'acceptable delays & spare capacity' (RMS Guide).

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- 248 truck movements; and,
- 174 staff movements (assuming 2 vehicle trips per staff member).

Accordingly, the tenant specific projections are less than the nominal RMS Guide generation assessment above. This comparison indicates that there is a contingency for 150 'other' vehicle movements per day in relation to miscellaneous movements for visitors and maintenance activities.

The Report states, that on the basis of the above data, it is considered appropriate to rely upon the standard assessment (above) with respect to assessing the traffic impacts of the proposed development.

Furthermore, it is evident that the proposed development is expected to generate in the order of 41 and 42 veh/hr during morning and evening peak periods. With contextual reference provided to the First Estate Master Plan assessment, the rates provided are considered consistent with that adopted for the Subject Site, when considering the reduced area of Lot 7.

With this in mind, it is anticipated that the road and intersection upgrades would be more than adequate to cater for the traffic generated by the proposed development. Accordingly, it is considered that no further road upgrades are required to support the proposed development.

With regard to parking requirements for the proposed development, a total of 114 car parking spaces are proposed for Lot 7 (refer to **Table 9**), which is considered compliant. Additionally, the proposed development would make provisions for two (2) accessible car parking spaces (based on one space for every 100 spaces provided), which satisfactorily addresses the requirement.

The proposed development is considered generally consistent with the Precinct planning undertaken previously. Previous modelling undertaken as part of the planning for the Altis Precinct (First Estate) concluded that the interim access arrangements to Mamre Road would operate with a Level of Service B during both peak periods. Notwithstanding, there is sufficient spare capacity within the planned intersection design to accommodate the traffic volumes generated by the proposed development.

Council's DCP requires bicycle parking to be provided in accordance with *Planning Guidelines for Walking and Cycling* (NSW Government 2004), which stipulated the following bicycle provision rates, including:

- 3% - 5% of staff (for staff); and,
- 5% - 10% of staff (for visitors).

Application of these rate would result in a requirement for between 7-13 bicycle spaces. These targets are considered optimistic for an industrial locality, such as the Subject Site, with a mode share of closer to 2% of staff considered more realistic, which would result in a nominal requirement for two (2) bicycle spaces. This figure is considered to be suitable in the short-term, with provision available for additional space in the longer term, should a demand for bicycle facilities arise. There is ample space near each building for bicycle spaces to be provided. **Note:** Bicycle parking is not shown on the Architectural Plans.

The Site's internal configuration – including consideration for light and heavy vehicular access, car parking and servicing areas – has generally been designed in accordance with Council's DCP and the relevant Australian Standards of AS2890.1, AS2890.2, AS2890.3 and AS2890.6.

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Separate driveways for commercial vehicles (trucks) and passenger vehicles (cars) are provided to minimise the interaction between these user groups, as far as practicable. Respective driveways would experience only moderate traffic volumes; therefore, the location of driveways (in proximity to other neighbouring developments) is not considered to raise any unacceptable impacts. Further swept path analysis is provided in Appendix A of the Report demonstrating access and egress to respective loading docks (refer to **Appendix 11**).

The Report concludes that the proposed development is supportable on traffic planning grounds and would not result in any adverse impacts on the surrounding road network or the availability of on-street parking.

6.7 WASTE

Details of construction and operational waste are provided within the Waste Management Plan at **Appendix 15**. Where possible all construction materials would be recycled either on-site through reuse or off-site at a licenced facility. Waste would be transported and disposed of off-site by a licenced contractor to a licensed landfill facility.

Similarly, recyclable and non-recyclable materials generated during operation would be collected and disposed of by a licenced contractor. The ongoing management of waste would be promoted through the following:

- Staff awareness of recyclable items, providing on-site training. This would include the company's Waste and Recycle policy with clear objectives and expectations;
- Staff awareness and educational programs would be run, which would supplement existing WH&S, and environmental programs on waste management;
- Suitable information would be supplied in staff induction kits, which would require refreshers on a yearly basis;
- The recycle and waste areas would be clearly marked and bins suitably labelled; and,
- Cleaning staff would be responsible for the day-to-day management and control of all waste and recycle stations.

Additionally, Snack brands provided the following projected waste volumes based on an average of three (3) other currently operating facilities, including:

- One (1) 8 m x 1.8 m HYPRO waste bin for finished good disposal (QA rejected stick / expired stock / damages). This bin would be changed over approximately once a month;
- One (1) 1.5 m x 2.5 m plastic waste bin. This would be changed over twice a week; and,
- One (1) 1.5 m x 2.5 m general waste bin. This would be emptied twice a week.

Further details are provided within **Appendix 15**.

6.8 NOISE AND VIBRATION

The *585-649 Mamre Road, Orchard Hills – Operational Noise Assessment – Lot 7 (Snack Brands)* (Acoustic Logic, 2018) considered the potential noise and vibration impacts of the proposed development (refer to **Appendix 13**).

The following noise controls and guidelines have been utilised throughout the acoustic assessment of the Site, including:

- Mamre West DCP;
- The Penrith DCP;
- The EPA Noise Policy for Industry;

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- The EPA Road Noise Policy;
- The EPA document – Assessing Vibration, A Technical Guideline; and,
- The EPA Interim Construction Noise Guidelines.

The locations of potential affected noise receivers are shown in **Figure 18** below.

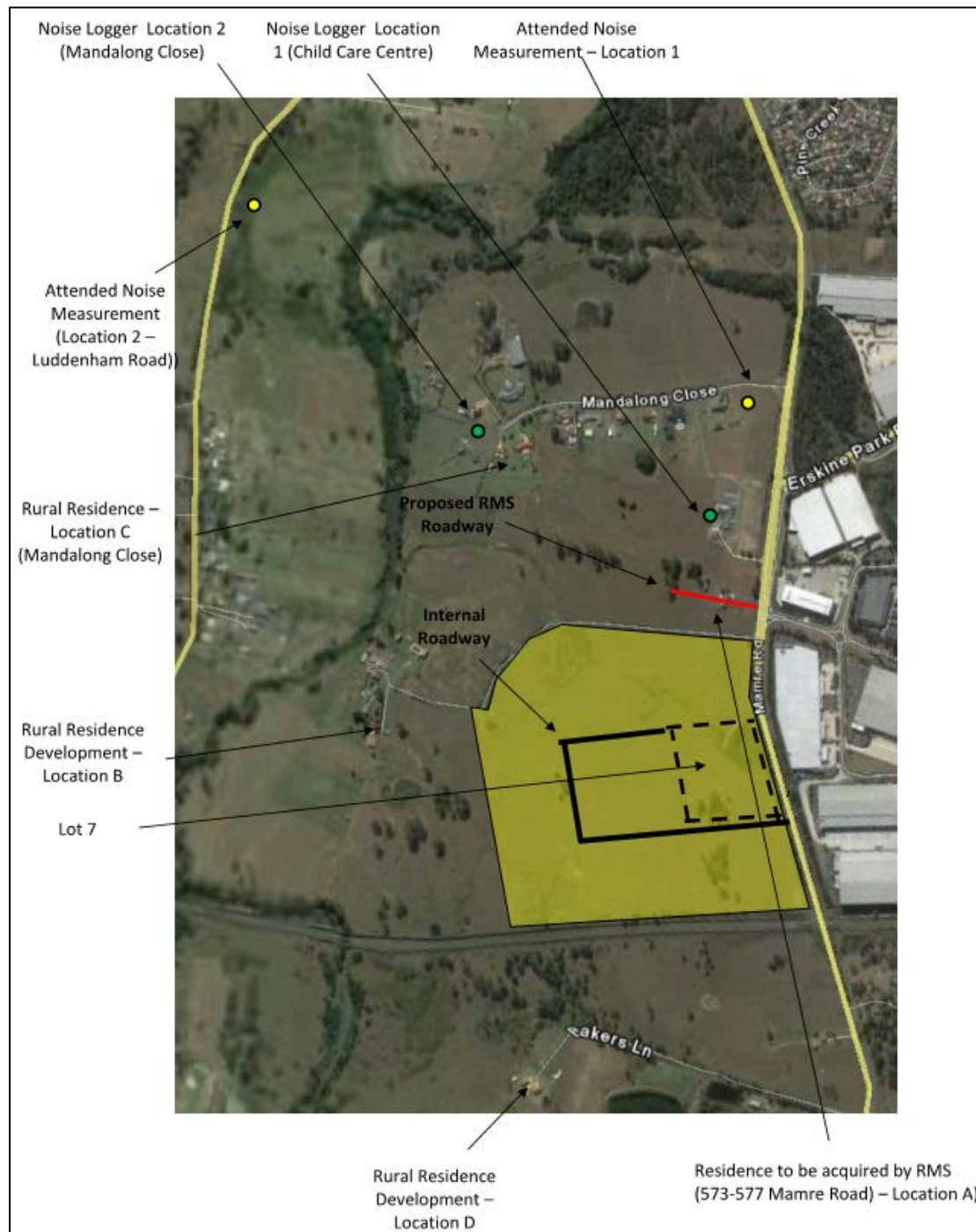


Figure 21 Location of Nearest Potentially Affected Noise Receivers (Acoustic Logic, 2018)

Noise impacts and emissions from the proposed development, specifically, from an operational standpoint have been assessed against the relevant noise assessment criteria, including the NSW Environmental Protection Authority (EPA) Noise Policy for Industry (NPI), which has two (2) requirements requiring adherence, namely an amenity criterion (refer to

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Table 18 below) and an intrusiveness criterion – which, cannot exceed 5 dB(A) above existing background noise levels (refer to **Table 19** below).

Table 17: EPA Project Amenity Criteria

Receiver Location	Land Type	Time of Day	Amenity Noise Objective dB(A) _{Leq(15min)}
All Potentially Affected Residential Properties	Rural Residential	Day Time (7am – 6pm)	48
		Evening (6pm – 10pm)	43
		Night (10pm – 7am)	38
Child Care Centre	All	When in use	55
Commercial	All	When in use	65
Industrial	All	When in use	70

Table 18: EPA NPfI Intrusiveness Criterion

Location	Time of Day	Background Noise Level – dB(A) _{L90}	Intrusiveness Noise Objective dB(A) _{Leq(15min)} (Background + 5dB)
Residential Receiver A – 573-577 Mamre Road			
All Potentially Affected Residential Properties	Day Time (7am – 6pm)	38	43
	Evening (6pm – 10pm)	38	43
	Night (10pm – 7am)	33	38
Residential Receivers B, C and E			
All Potentially Affected Residential Properties	Day Time (7am – 6pm)	38	43
	Evening (6pm – 10pm)	34	39
	Night (10pm – 7am)	34	39

The Report notes, to accurately determine the environmental noise, that a 15-20-minute measurement interval is utilised. Over this period, noise levels are monitored on a continuous basis and statistical and integrating techniques are used to determine noise description parameters. With regard to this, noise monitoring / logging (unattended) was undertaken between the 4th and 11th September 2015. Additionally, attended noise monitoring was made on the 11th September 2015 to measure existing noise levels generated by traffic on Mamre Road and Luddenham Road. Periodic data obtained from the above timeframes is displayed below in **Table 20**.

Table 19: Unattended and Attended Noise Monitoring Logging

Long Term Noise Logging Data (Unattended)

Location	Time of Day		
	Daytime (7am-6pm)	Evening (6pm-10pm)	Night (10pm-7pm)
Noise Logger Location 1 (applicable to 573-577 Mamre Road – Resident A)	50 dB(A) _{Leq(Period)} 38 dB(A) _{L90}	50 dB(A) _{Leq(Period)} 38 dB(A) _{L90}	46 dB(A) _{Leq(Period)} 33 dB(A) _{L90}
Noise Logger Location 2 (applicable to Residents B, C and D)	50 dB(A) _{Leq(Period)} 38 dB(A) _{L90}	50 dB(A) _{Leq(Period)} 34 dB(A) _{L90}	46 dB(A) _{Leq(Period)} 34 dB(A) _{L90}
Attended Noise Measurement (Road Traffic Noise)			
Location	Measured Noise Level – Daytime		

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Attended Measurement – Location 1 (40 m from Mamre Road)	64 dB(A) _{Leq(15hr)}
Attended Measurement – Location 2 (10 m from Luddenham Road)	68 dB(A) _{Leq(15hr)}

Due to the proposed development applying a 24-hour 7-day operation, sleep arousal impacts should also be considered for noise generated after 10 pm. **Tables 21 & 22** assess the average and maximum noise events with regard to the proposed development concerning sleep arousal. The Report notes that it can be concluded that maximum internal noise levels below 50-55 dB(A) are unlikely to awaken people from sleep.

Table 20: Sleep Arousal Criteria (Average/_{Leq} Noise Levels)

Location	Rating Background Level dB(A) _{L₉₀}	Rating Background Level + 5 dB(A)	Governing Criteria dB(A) _{L_{eq}(15mins)}
Receiver A	33	38	40
Receivers B and C	34	39	40

Table 21: Sleep Arousal Criteria (Maximum/_{L_{Max}} Noise Levels)

Location	Rating Background Level dB(A) _{L₉₀}	Rating Background Level + 15 dB(A)	Governing Criteria dB(A) _{L_(Max)}
Receiver A	33	48	52
Receivers B and C	34	49	52

Whilst **Tables 21 & 22** depicted above demonstrate the average and maximum thresholds with regard to sleep arousal, **Table 23** below demonstrates the noise events recorded between 10 pm and 7 am to accurately assess the potential impacts the proposed development would have on sleep arousal.

Table 22: Sleep Arousal Assessment (Truck Air-brake)

Receiver Location	Noise Source	Predicted Noise Level	Noise Limit	Compliance
Residential Receiver A (573-577 Mamre Road)	Truck Brake	38 dB(A) _{L_{Max}} *	52 dB(A) _{L_{Max}}	Complies
Residential Receiver B (West of Site)	Truck Brake	42 dB(A) _{L_{Max}} *	52 dB(A) _{L_{Max}}	Complies
Residential Receiver C (Mandalong Close)	Truck Brake	40 dB(A) _{L_{Max}} *	52 dB(A) _{L_{Max}}	Complies
Residential Receiver D (Bakers Lane)	Truck Brake	40 dB(A) _{L_{Max}} *	52 dB(A) _{L_{Max}}	Complies

The results above represent the noise emissions recorded from the window of the nearest residences, taking into account distance correction and air absorption. It is noted, that the noise emissions recorded against sleep arousal were found compliant with regard to the proposed development.

It is important to note, that noise levels generated by traffic should not exceed the noise levels set out in the table below when measured at a nearby building façade. **Table 24** below sets out the criteria for traffic noise generated by new developments.

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Table 23: Criteria for Traffic Noise Generated by New Developments

Road Type	Time of Day	Permissible Noise Generation
Sub-Arterial (Mamre Road)	Day (7 am to 10 pm)	60 dB(A) _{Leq(15hr)}
	Night (10 pm to 7 am)	55 dB(A) _{Leq(9hr)}

Despite the above listed criteria, noise generated by additional traffic has been addressed in the acoustics assessments previously conducted for the rezoning and subdivision of First Estate.

From an operational standpoint, no noise reduction for shielding from warehouses on other lots has been taken into account. As the remaining lots within the precinct are developed, noise from Lot 7 would become increasingly shielded by new warehouses that would lie between the sites. Furthermore, abiding by the EPA guidelines, the recorded noise emissions have been recorded at a point on the identified residential properties, which is 30 m from the location of the house. **Table 25** below outlines the results obtained.

Table 24: Noise Impact Assessment (Evening / Night)

Noise Source	Noise Receiver Location	Predicted Noise Level * dB(A) _{Leq(15min)}	Compliance
Vehicles on Site, Internal Activities, Refrigeration	Residential Receiver A (573-577 Mamre Road)	31 dB(A) _{Leq(15min)*}	Complies – Night time criteria (38 dB(A) _{Leq(15min)}) (Refer to Table 18)
	Residential Receiver B (West of Site)	35 dB(A) _{Leq(15min)*}	Complies – Night time criteria (39 dB(A) _{Leq(15min)}) (Refer to Table 18)
	Residential Receiver C (Mandalong Close)	33 dB(A) _{Leq(15min)*}	Complies – Night time criteria (39 dB(A) _{Leq(15min)}) (Refer to Table 18)
	Residential Receiver D (Bakers Lane)	36 dB(A) _{Leq(15min)*}	Complies – Night time criteria (39 dB(A) _{Leq(15min)}) (Refer to Table 18)
	Old McDonald Child Care Centre	30 dB(A) _{Leq(15min)}	Complies – When in use (55 dB(A) _{Leq(15min)}) (Refer to Table 18)

The noise emissions recorded indicate that even at an extremely conservatively high level of vehicle use anticipated, that the proposed development would still be compliant with the EPA noise emission guidelines, even during the night time period. Given, that Lot 7 is located in the east of First Estate, the predicted noise emission presented above in **Table 25** would further decrease at residences to the south north and west as the remaining lots within the estate are developed. This being due to future developments (warehouses) creating noise barriers between Lot 7 and the applicable residences.

It is noted that further detailed review of all external mechanical plant should be undertaken during the issuance of a Construction Certificate once equipment selections are finalised.

With regard to both construction noise and vibration, the Report notes, that construction noise management is not likely to be required, given the distance from the Site to the nearest residences, due to the majority of civil works completed once SSD 7173 was approved; and, it is unlikely that construction vibration would exceed EPA guidelines (for amenity) and highly unlikely to approach vibration levels with the potential to cause building damage.

An analysis of typical operational noise (vehicle, mechanical plant / equipment) indicates that:

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- The intended use for Lot 7 would be compliant with noise emission requirements provided that the following recommendations are adhered to accordingly, including:
 - Between 10 pm and 7 am, it assumed that would not be more than two (2) truck movements to the Site in a 15-minute period;
 - Trucks with tonal reversing beacons and use of diesel forklifts in external areas are not recommended in external areas on the Site; and,
 - Detailed review of any proposed external mechanical plant (if required) should be undertaken at the Construction Certificate stage of the proposed development.

The Report concludes that the noise and vibration impacts from the construction and operational phases of the proposed development would not have a significant impact on the residents within the vicinity of the proposed Warehouse and Distribution Facility on Lot 7 within First Estate. Additionally, it is considered unlikely that a detailed Construction Noise and Vibration Management Plan would be needed with regard to the proposed development.

6.9 AIR QUALITY AND ODOUR

The *585-649 Mamre Road, Orchard Hills – Air Quality and Odour Assessment* Report (SLR, 2018) considered the potential air quality impacts of the proposed development (refer to **Appendix 12**). In March 2016, SLR submitted an Air Quality Impact Assessment (AQIA) that assessed emissions to air from the proposed construction activities and future operations of Lots 7, 8A and 8B, 585-649 Mamre Road through a combination of qualitative and quantitative techniques.

Covering the entire proposed Stage 1 development of SSD 7173, the AQIA included a qualitative assessment of the risk of adverse impacts on local air quality from construction using the *Institute of Air Quality Management (IAQM)* approach. As part of Stage 1 of SSD 7173, no demolition works were proposed as part of the proposed Stage 1 development; however, the following works were anticipated, including:

- Clear approximately 449,800 m² of the site to a nominal 0.5 m depth;
- Establish hard standing on approximately 60% of the total site(s);
- Construct a steel framed building covering approximately 80,050 m² to an assumed height of 12 m above ground level (AGL) (equating to 960,000 m³ in building volume); and,
- Assume an access route around the site during construction works of up to 2.0 km in total length.

Based on the above assumptions, the dust emission magnitudes were estimated according to the IAQM methodology and are reproduced below in **Table 26** for reference.

Table 25: Categorisation of Dust Emission Magnitude	
Activity	Dust Emission Magnitude
Demolition	N/A
Earthworks	Large
Construction	Large
Trackout	Large

The proposed development for Lot 7 (Snack Brands) includes a proposed Warehouse and Distribution Facility of approximately 31,550 m². This is considerably smaller than the building area assessed under previously approved SSD 7173 (80,050 m²). The dust emission magnitudes shown in the above table were categorised as 'large', which correlates to a total building volume greater than 100,000 m³. This would effectively account for any additional building volumes being constructed at the same time as the Snack Brands development.

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The results of the previously approved SSD 7173 regarding a qualitative assessment were inclusive of adverse impacts to air quality from the proposed construction of Lot 7, as-well-as conservatively addressing any anticipated impacts to air quality from the construction of all nine (9) lots concurrently as approved under Stage 1 of SSD 7173. Notwithstanding, adverse impacts to air quality as a result from proposed construction activities outlined in the qualitative assessment in the AQIA could be relied on to address the impacts of construction from the proposed development concerning Lot 7 (Snack Brands).

The AQIA in SSD 7173 describes that the sensitivity of identified receptors (refer to **Figure 17**) in the study is concluded to be high for health impacts for dust soiling, as the receptors are dwellings; however, the sensitivity of the surrounding area to health effects has been classified as 'low', and the sensitivity of the area to dust soiling is classified as low (based on distance to each receptor).



Figure 22 Location of Identified Sensitive Receptors

Based on the above, with regard to SSD 7173, a range of control measures to minimise fugitive dust emissions were outlined for inclusion in the Construction Environmental Management Plan (CEMP) for First Estate. Subject to any dust-generating activities during the construction phase for the proposed development on Lot 7, the following conservative control measures implemented as part of the CEMP for First Estate should be adopted to minimise any dust emissions from occurring, including:

- Nuisance dust controls through water spraying, particularly during periods of heavy on-site activity;

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- Ensuring vehicles and machinery are maintained in accordance with manufacturer's specifications;
- Minimising truck queuing and unnecessary trips through logistical planning of materials delivery and work practices;
- Ensure all vehicles switch off engines when stationary so that there are no idling vehicles;
- Fixed plant should be located as far from local receptors as practicable;
- Storage areas for all liquids should be appropriately bunded;
- For general site management, air emissions associated with all construction activities should be managed through compliance with the CEMP that was integrated as part of SSD 7173 for First Estate;
- A complaint(s) logging system should be maintained by Council and the construction contractor to monitor complaints; and,
- During construction works for Lot 7, no air quality monitoring is considered necessary due to the findings in SSD 7173; however, suspended particulate monitoring on the boundary in close proximity to identified receptors may be performed to assist in overall dust management and to confirm the mitigation measures during the construction phase are being adhered to accordingly.

From an operational standpoint, the 'RMS Technical Direction 04a' gives the following traffic generation rates for the Erskine Business Park Industrial Estate, which are considered to representative of the proposed development:

- 0.134 trips per 100 m² GFA (total building, warehouse and office) during the morning peak hour;
- 0.139 trips per 100 m² GFA during the evening peak hour; and,
- 1.892 trips per 100 m² GFA per day.

For the proposed Warehouse and Distribution Facility on Lot 7 for Snackbrands, the application of the above rates would result in:

- 41 vehicles / hour during the AM peak hour;
- 42 vehicles / hour during the PM peak hour; and,
- 572 vehicles per day.

Furthermore, the predicted modelling results for the operational activities (namely traffic emissions) presented in the AQIA could be expected to adequately address the potential impacts to air quality from operational activities occurring at the proposed Warehouse and Distribution Facility on Lot 7. This is due to the estimated vehicle activity only amounting to approximately 27% of the overall vehicles modelled; hence, would only contribute to 27% of the predicted concentrations for First Estate.

For contextual purposes the operational activities of the remaining seven (7) lots at 585-649 Mamre Road may also be adequately addressed by the predicted modelling results outlined in the AQIA due to the conservatism in the modelling, which includes the following:

- An additional 1,173 vehicles per day in the modelling (55% of 2,139 vehicles modelled in the AQIA), which could account for traffic volumes to Lots 2-6 and Lots 8-9;
- The vehicle kilometres travelled on-site assumed was 2 km per vehicle, and 4,278 vehicle kilometres travelled in total. This is likely to be highly conservative, and provides a large buffer on actual vehicle numbers (if vehicles only travel 1 km on-site, this represents an additional 3,312 vehicles that have been included in the modelling);

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- 100% of vehicles on-site have been assumed to weigh at least 22.5 tonnes, with 30% of the total vehicles defined as heavy vehicles weighing 62.5 tonnes. This is highly conservative when calculating wheel-generated dust as a proportion of the total vehicles would be passenger cars;
- 41 loading docks have been modelled as occupied. While this does not represent all the loading docks across the Site, it is considered a conservative assumption that 41 loading docks will be occupied for the whole hour, every hour of the day – noting, Lot 7 only contains a small portion of loading docks; and,
- In the modelling undertaken for the AQIA, the initial plume is concentrated as all the emission sources (i.e. vehicles) have been defined on Lot 7, 8A and 8B; therefore, dispersion at the nearest sensitive receptors would be more conservative than if the sources had been spread across all the lots.

Recommendations drawn from the AQIA for SSD 7173 for the operational phase of Lot 7 should also be considered, including:

- Ensuring vehicles are maintained in accordance with manufacturer's specifications;
- Minimising truck queuing and unnecessary trips through logistical planning of materials delivery and work practices;
- Ensure all vehicles switch off engines when stationary so that there are no idling vehicles;
- The complaints logging system maintained during construction works would be continued during the operational phase of development; and,
- During operation, no air quality monitoring is considered necessary, given the results of the assessment.

Recommendations for the construction phase include continued adherence to the control measures listed in the CEMP as provided for First Estate as part of SSD 7173, which included Lot 7 in the scheme. Concerning the operational phase of the proposed development, the proposed operational activities are considered compliant with all OEH relevant ambient quality criteria at all sensitive receptors, even when existing background pollutant levels are considered. Concluding it is important to note that the results displayed throughout the AQIA are conservatively high, and it is anticipated that level would be expected to be lower during normal operational timeframes.

6.10 HAZARDS AND RISKS

The storage of Dangerous Goods is not proposed under the subject SSD Application. Any future proposals to store such goods would be subject to further assessment under *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development* (SEPP 33).

6.11 BIODIVERSITY

As approval to remove all vegetation on the Site was previously granted under SSD 7173, further consideration is not required.

6.12 ECONOMIC IMPACTS

An Economic Impact Assessment report was undertaken by MacroPlan Dimasi in lieu of SSD 7173 which has since been approved. Conclusions drawn from the report can be found transposed below due to the connotative elements mentioned throughout the Report being rather transparent concerning the proposed development for Snack Brands.

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Based on assessment of regional economic conditions, an assessment of the property's (specifically Lot 7 in this instance) potential market position, with comparisons being made to existing and proposed industrial developments and other relevant infrastructure projects, and an industrial land supply assessment, the Report determined that:

- Industrial markets have been very active in Western Sydney, specifically, the WSEA;
- There has been growth in regional demand for industrial floorspace spurred by regional population growth (as part of a logistics supply chain for the retail, construction, manufacturing and commercial sectors);
- Demand for industrial floorspace would be further heightened with the completion of the Western Sydney Airport (Badgerys Creek) and major road infrastructure upgrades throughout Western Sydney.

The Report predicts that over a five (5) year period, demand for industrial floor space within Western Sydney would increase due to both cyclical and structural drivers. Additionally, the Report stipulates, that unless more zoned and serviced lots are provided in accordance with demand, there would be subsequent pricing pressure on industrial land. In response to the assessment made at the time of SSD 7173, the Report recommended that a new supply of 'shovel-ready lots', such as the subject site (First Estate) were required, for which Lot 7 was part of the assessment.

The market opportunity derived from the subject site (First Estate) being transparent to the proposed development for Snack Brands, relates to:

- A superior connection to the Sydney Orbital Road System via Mamre Road and other roads to be improved within the Western Sydney Infrastructure Plan upgrades;
- Accessibility to major industrial employment hubs including the Moorebank Intermodal Terminal;
- Its location within the WSEA;
- Co-location with the Westpark Industrial Estate;
- Proximity to the proposed Sydney Science Park at Luddenham;
- A growing resident population in Western Sydney and access to a large pool of white-collar labour resources (i.e. Glenmore Park, Jordan Springs, Werrington, etc.), evidenced by a shift in occupation and education attainment in the Penrith LGA and in new estate locations (i.e. Thornton);
- Proximity to Sydney's second airport at Badgerys Creek – through Elizabeth Drive and Badgerys Creek Road;
- The Subject Site (First Estate – including Lot 7) is well positioned to capitalise on interest from the aviation industry; and,
- An opportunity to deliver affordable rents and ample car parking.

Deriving from a series of assumptions regarding the development potential of the Site, the proposed development has the potential to generate construction jobs in the order of approximately 300 persons, while operational jobs are anticipated to be in the order of 90 persons.

The conclusions drawn from the Report are reflective of the proposed development at Lot 7 for Snack Brands and in line with the objectives, specifically employment-generating development within SEPP WSEA.

6.13 ABORIGINAL CULTURAL HERITAGE

Given the findings previously obtained under SSD 7173, further consideration is not required in respect of Aboriginal Heritage. Should any unexpected finds be located, all works should cease, and an archaeological expert be contacted to determine the validity of the find.

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6.14 HISTORIC HERITAGE

Given the findings previously obtained under SSD 7173, further consideration is not required in respect of Historic (European) Heritage. Should any unexpected finds be located, all works should cease, and an archaeological expert be contacted to determine the validity of the find.

6.15 BUSHFIRE

A Bushfire Assessment Report has been prepared by Peterson Bushfire (refer to **Appendix 16**). The Bushfire Assessment Report provides assessment of the bushfire hazard of the Site and addresses the relevant requirements set out in the 'NSW Rural Fire Service' (RFS) document, *Planning for Bushfire Protection, 2006* (PBP).

Although mapped as being bushfire prone land, the Site and surrounding lands consist of actively grazed and well maintained paddocks and yards such that there is minimal grass fuel to sustain the spread of fire and cause impact to a future development. Consequently, the proposed development has been rated BAL-LOW in accordance with Method 1 assessment of AS 3959-2009, 'Construction of Buildings in Bushfire-Prone Areas'.

The PBP requires the consideration of a managed hazard-separation area referred to as 'defendable space'⁴ for fire fighting purposes. The Report provides consideration of bushfire threat and defendable spaces, as summarised below in **Table 27**.

Table 26: Defendable Space between the Bushfire Threat and the Proposed Development			
Direction	Vegetation Classification	Effective Slope	Existing of Proposed Defendable Space (m)
North	Grazed Paddocks	Flat	>40 m
South	Grazed Paddocks	Flat	>40 m
East	Developed Land	Flat	>100 m
West	Grazed Paddocks	Flat	>40 m

The findings of the original bushfire assessment (SSD 7173) identified a large remnant of Shale Plains Woodland on flat ground to the south of First Estate. The woodland was identified greater than 300 m from the proposed development. Additionally, the original bushfire assessment also concluded that the paddocks surrounding First Estate did not act as a grassland hazard due to the lack of native grasses and available fuel loads (as a result of grazing). The Report confirmed that the proposed development would be greater than 250 m from the paddocks with separation provided by cleared lots and warehouse developments.

The Report confirms that the access with regard to proposed development on Lot 7 within First Estate complies with the PBP, consisting of separate tuck and car entry/exit, fire access, as-well-as hardstand and car parking. The proposed roads within First Estate have been designed to allow fire appliances to enter the Site and access the proposed structures and assets for any required fire-fighting operations.

Additional recommendations in order to comply with the PBP are considered below, including:

- *The entire lot, including landscaping, is to comply with the performance requirements of an Inner Protection Area (IPA) as described by 'Planning for Bushfire Protection, 2006';*

⁴ An area within the asset protection zone that provides an environment in which a person can undertake property protection after the passage of a bushfire with some level of safety (PBP, 2006).

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- *The development will require fire hydrants to be installed to comply with AS 2419.1 – 2005 Fire Hydrant Installations – System Design, Installation and Commissioning (AS 2419) so that buildings are within 70 m of a hydrant (or 90 m with a tanker parking in-line maximum 20 m from the hydrant);*
- *In accordance with PP, electricity should be underground wherever practicable. Where overhead electrical transmission lines are installed no part of a tree should be closer to a powerline than the distance specified in "Guideline for managing vegetation near power lines" issued by Department of Energy, Utilities and Sustainability (ISSC 3, December 2005); and,*
- *Any gas services are to be installed and maintained in accordance with AS/NZS 1596-2008 The storage and handling of LP gas.*

The Report concludes, that the bushfire protection recommendations listed, provide an adequate standard of bushfire protection for the proposed development consistent with the PBP.

6.16 INFRASTRUCTURE REQUIREMENTS AND CONTRIBUTIONS

All public utility infrastructure including: potable water, waste water, electrical supply; telecommunications and gas were assessed under SSD 7173, which has been previously determined and approved.

Furthermore, a VPA has been executed between the Minister for Planning, The Trust Company (Australia) Limited and Altis Bulky Retail Pty Limited under SSD 7173 which remains applicable to the proposed development.

6.17 GREENHOUSE GAS AND ENERGY EFFICIENCY

The *585-649 Mamre Road – Ecologically Sustainable Design Report* (refer to **Appendix 14**) considers greenhouse gas emissions and energy efficiency with regard to the proposed development. The proposed development would incorporate a number of ecologically sustainable initiatives to reduce the overall consumption of potable water and greenhouse gas emissions of the facilities. Initiatives relate to:

- Energy & Greenhouse Gas Emissions;
- Potable Water Reduction;
- Minimising Waste to Landfill;
- The Indoor Environment;
- Occupant Amenity and Comfort;
- Land Use & Ecology;
- Emissions; and,
- Building Management.

The offices have been analysed for a number of different design elements and various configurations, including:

- High performance glazing;
- Zoned mechanical systems (center / perimeter);
- Wider temperature control band;
- Increased mechanical equipment performance;
- Increased light efficiency;
- Combining the above elements; and,
- PV to 10% on the roof.

The proposed warehouses contribute to approximately 98% of the total building area and as such are responsible for the significant component of energy consumption within the Site. A

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number of initiatives have been proposed to reduce the greenhouse gas emissions and environmental damage associated with warehousing components of the proposed development. These include the following:

- Natural ventilation of the warehouses, except where for functional reasons this is not practicable (i.e. refrigeration rooms, freezer rooms as required);
- Roof ventilators are proposed to provide effective air changes to the space. This reduced the build-up of heat in the space and encourages air circulation. This also helps control humidity in the space, reducing concerns of mould in the space;
- Encouraging natural lighting where possible, through the use of translucent roof materials, targeting 10% across the warehouse roofing components;
- Rainwater harvesting and reuse; and,
- Lighting controls including zoned switching, motion sensors and / or time clocks – which can reduce lighting load by 30%.

Table 28 below provides an estimation of the energy consumption of the proposed development.

Table 27: Energy Consumption Estimation			
	Baseline (kWh/m²/year)	Combined Case (kWh/m²/year)	Total Area (m²)
Office	127	86	600
Warehouse	34	24	29,655
Energy Saving		32%	

Further details can be found in the Ecologically Sustainable Development Report located at **Appendix 14**.

6.18 ECOLOGICALLY SUSTAINABLE DEVELOPMENT

The *585-649 Mamre Road – Ecologically Sustainable Design Report* (refer to **Appendix 14**) considers ecologically sustainable development opportunities and initiatives with regard to the proposed development. The proposed development would incorporate a number of ecologically sustainable initiatives to reduce the overall consumption of potable water and greenhouse gas emissions of the facilities. Initiatives relate to:

- Energy & Greenhouse Gas Emissions;
- Potable Water Reduction;
- Minimising Waste to Landfill;
- The Indoor Environment;
- Occupant Amenity and Comfort;
- Land Use & Ecology;
- Emissions; and,
- Building Management.

The following ecologically sustainable initiatives would be included in the proposed site design, to align accordingly with the controls and objectives of PDCP2014 and the Mamre West Precinct DCP. These include:

- **Landscaping:** The Site offers a consistent landscaped border, with vegetation consistently throughout. This is provided in the landscape setback on all four (4) sides of proposed development, including the 10 m setback on Mamre Road and around the estate access road that borders the Site. These clearances are designed in line with access requirements and those outlined in the Mamre West Precinct DCP;
- **Access:** Pedestrian footpaths would be made available at street level, further encouraging a walkable site and alternative transport option;

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- **Shade:** Awnings would be provided at each access point to the warehouses. This would be provided on the warehouse edge, where trucks correspondingly load and unload, providing added sun protection for employees; and,
- **Vegetation:** The landscaping of the Site would include the coordinated planting of new trees in the landscape setback region provided around the Site boundary. The 10 m setback along Mamre Road would be vegetated. The setbacks along the estate access road would also include vegetative characteristics.

The proposed development would additionally seek to address environmental management and building operational performance through the following initiative items, including:

- Building Commissioning & Tuning Procedures;
- Energy Meeting; and,
- Water Provisions.

The Report concludes that the proposed development's commitment to reducing the overall environmental impact is evident of the holistic approach taken to long-term sustainability. This is reflected through incorporation of the ecologically sustainable initiative items listed at the commencement of this section above.

6.19 BUILDING CODE OF AUSTRALIA AND FIRE ENGINEERING

As demonstrated within the *Building Code of Australia Report: Snackbrands Australia – NSW Distribution Facility Stage 1 – 585-649 Mamre Road, Orchard Hills* (Mckenzie Group, 2018), the proposed Warehouse and Distribution Facility must be designed to comply with the BCA. The detailed design of the proposed Warehouse and Distribution Facility would be in accordance with the BCA and would be further assessed prior to the issue of a Construction Certificate.

The Report (refer to **Appendix 17**) details, that following the assessment of the design documentation (provided by Nettleton Tribe) has revealed that following areas (refer to **Table 29** below) are required to be assessed against the relevant performance requirements of the BCA. Furthermore, the submission for a Construction Certificate would need to include verification from a suitably accredited fire engineer:

Table 28: Compliance Summary Table Against Relevant Performance Requirements			
Fire Safety Items			
No.	Alternative Solution Description	DTS Clause	Performance Requirement
1.	<u>Perimeter Vehicular Access</u> The perimeter vehicular access provided to a portion of the southern façade is up to 26 m away in lieu of 18 m to the far side. Furthermore, the access provided to the north of the site is proposed to be on an adjoining allotment.	C2.3, C2.4	CP9
2.	<u>Exit Travel Distances</u> The locations of the proposed exits are to be confirmed; however, it is anticipated that a performance solution will be required for travel distance to a point of choice, travel distance to an exit and travel distances between alternate exits.	D1.4, D1.5	DP4, DP5
3.	<u>Hydrant Coverage</u>	E1.3	EP1.3

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	It is anticipated that there will be some hydrants under awnings that will be considered as external hydrants for the purposes of coverage, and that there will be some areas of shortfall in coverage where additional hose lengths will be required.		
4.	<u>Fire Hose Reel Coverage</u> It is anticipated that there will be some areas within the warehouse that are not provided with compliant fire hose reel coverage.	E1.4	EP1.1
5.	<u>Smoke Hazard Management</u> The proposed smoke hazard management is to be rationalized based on smoke modelling.	E2.2	EP2.2
6.	<u>Exit Sign Heights</u> The directional exit signs are proposed to be located more than 2.7 m above the FFL.	E4.5, E4.6	EP4.2

Further to the above, the fire engineered solution relating to CP9, EP1.3 and EP2.2 would be subject to consultation with the NSW Fire Brigade as part of the Construction Certificate process under Clause 144 of the EP&A Regulation. The subsequent application for a Construction Certificate would be assessed under the applicable provisions of the EP&A Act and EP&A Regulation.

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PART G DRAFT MANAGEMENT AND MITIGATION MEASURES

By:	Altis Property Partners
In relation to:	Proposed Warehouse and Distribution Facility – State Significant Development Application
Site:	Lot 7, 585-649 Mamre Road, Orchard Hills (Lot 2171 DP 1153854)

Altis Property Partners would undertake the facilitated construction and operation of the proposed Warehouse and Distribution Facility in accordance with the following:

Below prescribes some of the terms and abbreviations used in this Statement, including:

Approval	The Minister's approval of the proposed development
Altis Property Partners	Altis Property Partners Pty Ltd
BCA	Building Code of Australia
Council	Penrith City Council
Department	Department of Planning and Environment
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act, 1979</i>
Project	The proposed development as described in this EIS
Secretary General	Secretary General of the Department (or delegate)
Site / Subject Site	Land to which the project application applies
WorkCover	NSW WorkCover

ADMINISTRATIVE COMMITMENTS

Commitment to Minimise Harm to the Environment

1. Altis Property Partners would implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction or operation of the project.

Occupation Certificate

2. Altis Property Partners would ensure a staged Interim and Final Occupation Certificate is obtained prior to the occupation of the facilities.

Terms of Approval

3. Altis Property Partners would carry out the project generally in accordance with the:
 - a) Environmental Impact Statement;
 - b) Drawings prepared by Altis Property Partners;
 - c) Management and Mitigation Measures;
 - d) Any Conditions of Approval.
4. If there is any inconsistency between the above, the Conditions of Approval shall prevail to the extent of the inconsistency.
5. Altis Property Partners would ensure compliance with any reasonable requirement/s of the Secretary-General of the Department of Planning and Environment arising from the Department's assessment of:
 - a) Any reports, plans, programs, strategies or correspondence that are submitted in accordance with this Approval; and
 - b) The implementation of any recommended actions or measures contained in reports, plans, programs, strategies or correspondence submitted by the Project Team as part of the application for Approval.

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Structural Adequacy

6. Altis Property Partners would ensure that all new buildings and structures (high bay and low bay warehouse and ancillary offices) on the Site are constructed in accordance with the relevant requirements of the BCA.

Operation of Plant and Equipment

7. Altis Property Partners would ensure that all plant and equipment used on the Site is maintained and operated in proper and efficient manner, and in accordance with relevant Australian Standards.

Construction Traffic Management Plan

8. Altis Property Partners would ensure a Construction Traffic Management Plan is prepared and submitted to DP&E. This plan would:
 - a) be submitted to the Secretary-General for approval prior to the commencement of construction;
 - b) describe the traffic volumes and movements to occur during construction;
 - c) detail proposed measures to minimise the impact of construction traffic on the surrounding network, including driver behaviour and vehicle maintenance; and,
 - d) detail the procedures to be implemented in the event of a complaint from the public regarding construction traffic.

Contractors Environmental Management Plan

9. Prior to the commencement of construction, a contractors Environmental Management Plan (CEMP) would be prepared that addresses the following:
 - a) Land Contamination;
 - b) Air Quality;
 - c) Waste Classification;
 - d) Erosion and Sediment Control; and,
 - e) Materials Management Plan

Monitoring of State of Roadways

10. The applicant should monitor the state of roadways leading to and from the Site and should take all necessary steps to clean up any adversely impacted road pavements as directed by Council.

Waste Receipts

11. A permanent record of receipts for the removal of both liquid and solid waste from the Site should be kept and maintained up to date at all times. Such record is to be made available to authorised person upon request.

SPECIFIC ENVIRONMENTAL COMMITMENTS

Noise

12. Construction on the Site would only be undertaken between 7am and 6pm Monday to Friday, and 7am and 1pm on Saturdays. No construction would be allowed on Site on Sundays or public holidays. The following specific measures are proposed throughout the construction and operational phases of development:
 - a) Prompt response to any community issues of concern;
 - b) Noise monitoring on site and within the community;
 - c) Refinement of onsite noise mitigation measures and plant operating procedures where practical;
 - d) Preparation of a formal noise management plan including noise monitoring program;

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- e) For equipment with enclosures (i.e. compressor rooms) ensure door and seals are well maintained and kept closed when not in use;
 - f) Keep plant and equipment well maintained, regular inspection and maintenance of equipment to ensure it is good working order;
 - g) Equipment not to be operated until it is maintained or repaired;
 - h) Regularly train workers (ie toolbox talks) to use equipment in ways to minimise noise;
 - i) Operate mobile plant in a quiet, efficient manner;
 - j) Switching off vehicles and plant when not in use; and,
 - k) Incorporate clear signage at the Site including relevant contact numbers for community enquiries.
13. Prior to issue of an Occupation Certificate, the following recommendations provided in the Noise Impact Assessment Report should be acknowledged and adhered to accordingly, including:
- Between 10 pm and 7 am – it is assumed that there would not be more than two (2) truck movements to the Site in a 15-minute period;
 - Trucks with tonal reversing beacons and the use of forklifts in external areas are not recommended in external areas on the Site; and,
 - Detailed review of any proposed external mechanical plant should be undertaken at CC Stage (once equipment selections are known).

Air Construction Traffic

14. During construction:

- a) all trucks entering or leaving the Site with loads have their loads covered;
- b) trucks associated with the project do not track dirt onto the public road network; and,
- c) the public roads used by these trucks are kept clean.

Dust Management

15. During the construction phase of the project, all reasonable and feasible measures must be considered to minimise the dust generated by the project. These include:

Source	Control Measures
General	
Visual Inspection	Carry out visual inspections of the Site during site preparatory/construction activities and employ measures where necessary to minimise any visible air pollution generated by the Project.
Regular Maintenance	Regularly inspect and perform maintenance on dust control technologies (i.e. water sprays nozzles) and measures to ensure the effectiveness of these controls.
Erosion Control Structures	Silt and other material removed frequently from around erosion control structures to ensure deposits do not become a dust source.
Vegetated Buffers	Retain existing vegetation where appropriate and implement additional vegetated buffers around the boundary of the site to provide act as a physical barrier to the transport of pollutants in the direction of sensitive receptors.
Waste Materials	Cleared vegetation, demolition materials and other combustible waste material shall not be burnt on site. All waste materials be appropriately contained (in skips, bins) and covered during adverse weather conditions and handled in accordance with the site's Waste Management Plan.
Wind Blown Dust Sources	
Disturbed Areas	- Disturb only the minimum area necessary.

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	<ul style="list-style-type: none"> - Stabilise all disturbed areas as soon as practicable to prevent or minimise windblown dust. - Rehabilitate disturbed areas as soon as practicable with a layer of inert material and vegetation (generally a minimum of 500mm). - Regularly assess weather conditions to identify adverse weather conditions that are unfavourable in terms of dust levels at receptor locations surrounding the Site (i.e. on dry days, during strong winds, and particularly north easterly winds blowing in direction of the school).
Stockpile/s	<ul style="list-style-type: none"> - Water sprays and/or covers would be employed for material stockpiles, particularly during adverse weather conditions, to minimise dust generation. - Stockpiles would be covered overnight. - Use of chemical dust suppressants would also be used where necessary. - Fencing, bunding or shelterbelts used to reduce ambient wind speeds (in some areas).
Transportation (Trucks)	<ul style="list-style-type: none"> - Truck loads covered with tarpaulin or lid prior to transport of dusty materials by road. - Minimise truck queuing and unnecessary trips through logistical planning of materials delivery and work practices. - Reduce vehicle / truck idling times. - Maintain a following distance of trucks of 20 seconds minimum to allow for dust clouds generated by the lead truck to dissipate. - Install a truck wheel wash or shaker grid to remove any loose dirt.
Activity Generated Dust Sources	
Internal Road Dust	<ul style="list-style-type: none"> - Roads and trafficked areas would be watered down using a water cart and/or sprinkler to minimise the generation of dust. - Haulage vehicles would be restricted to the most direct route and minimal manoeuvring areas to prevent indiscriminate driving over non-active areas. - Haul roads and hard stand areas would have designated speed limits (ie generally 20 km/hour). - Enforce speed limits on all on-site vehicles to minimise wheel-generated dust. - Stabilise access roads and work areas as soon as practicable to prevent or minimise windblown dust. - Maintain roads on a regular basis to ensure roads are clearly marked, pot holes and corrugations are eliminated, and extra material build up is removed or redistributed on the road. - Chemical dust suppressants used where necessary.
External Road Dust	<ul style="list-style-type: none"> - Vehicles causing dirt track out onto main roads would be cleaned up on a regular basis to prevent this becoming an additional source of dust. - Material spillages would be cleaned up promptly.
Excavation	<ul style="list-style-type: none"> - Apply water sprays to trucks and loading points for dust suppression.
Loading and Dumping	<ul style="list-style-type: none"> - Dump heights would be minimised wherever possible (reduce to 5 m).
Plant and Equipment	<ul style="list-style-type: none"> - All plant and equipment used during mining activities would be maintained and operated in a proper and efficient

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	condition. <ul style="list-style-type: none">– Reduce idling times of trucks and other machinery.– Fixed plant should be located as far from local receptors as possible.
Excessive Dust Events	
Internal Roads	<ul style="list-style-type: none">– Employ additional water spraying / water carts.– Further reduce speed on haul roads during high winds.– Halt traffic movements.
Stockpiles	<ul style="list-style-type: none">– Cover stockpiles of material.
Project Site	<ul style="list-style-type: none">– Temporarily halt activities and resume once weather conditions have improved.

Waste Management

16. Altis Property Partners would ensure that all waste generated on-site during operation is classified in accordance with the Office of Environmental and Heritage's *Waste Classification Guidelines: Part 1 Classifying Waste* and disposed of to a facility that may lawfully accept the waste.

Erosion and Sediment Control

17. Altis Property Partners would install silt traps during the construction phase to ensure there are no pollutants or sediments that exit the Site or unacceptable impacts that would result on surrounding vegetation or waterways.

Protection of Vegetation

18. Altis Property Partners would mark the clearance boundaries prior to commencement of construction to ensure that there is no unnecessary removal of vegetation. It is noted that vegetation removal has been previously approved under SSD 7173 for First Estate.

Aboriginal Heritage

19. During works, Altis Property Partners would notify the NSW Office of Environment and Heritage should an Aboriginal site and/or object be recorded in the Aboriginal Heritage Information Management System (AHIMS).

Protection of Infrastructure – Water NSW

20. Altis Property Partners would carry out the following as part of the development:

- Access Consent:** grant as required for Water NSW to access the pipeline corridor.
- Security fencing:** ensure a security fence is erected on the boundary of the development site and the Warragamba Pipelines (minimum 1.8-metre-high chain wire with three barbed wire strands) – or palisade (as per the published guidelines).
- Stormwater:** ensure any stormwater from the corridor is not impeded and is accommodated within the development site's stormwater system.
- Protection from damage from any works adjacent to the Warragamba Pipelines:** When undergoing any earthworks, civil infrastructure works or when constructing any buildings adjacent to the pipelines, exercise care to ensure no damage occurs to the water supply infrastructure.
- Vehicular access points:** During the construction period ensure access remains free for use by Water NSW staff and contractor vehicles 24 hours a day

Ecologically Sustainable Development

21. Altis Property Partners would investigate the following ESD measures in respect of:

- Energy & Greenhouse Gas Emissions;
- Potable water reduction;

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- c) Minimising waste to landfill;
- d) The Indoor Environment;
- e) Occupant amenity and comfort;
- f) Land Use & Ecology;
- g) Emissions; and,
- h) Building Management

Bushfire Protection

22. Altis will ensure that:

- a) Fire hydrants to be installed to comply with AS 2419.1 – 2005 Fire Hydrant Installations - System Design, Installation and Commissioning (AS 2419);
- b) Where overhead electrical transmission lines are installed no part of a tree should be closer to a powerline than the distance specified in "Guideline for managing vegetation near power lines" issued by Department of Energy, Utilities and Sustainability (ISSC 3, December 2005);
- c) Gas services are to be installed and maintained in accordance with AS/NZS 15962008 The storage and handling of LP gas.

PART H PROJECT DEVELOPMENT JUSTIFICATION

The proposed development is justified in the context of environmental, social and economic terms and is compatible with the locality in which it is proposed.

This application is lodged on the basis of:

Supporting State, Regional and Local Planning Objectives

The proposed development is consistent with the objectives, provisions and strategies outlined within the *NSW:2021*, the *Greater Sydney Region Plan*, the *Western City District Plan* and SEPP WSEA.

Appropriate Use of an Approved Site

The proposed development would retain and contribute to the growth of important industry for the immediate locale as-well-as the wider region. The strengthening of this sector is an important strategy for the economic welfare of Western Sydney as a region as-well-as the wider NSW Government Region. The proposed development compliments significant government investment in infrastructure and strategic planning vision as enunciated throughout State & Regional Strategies alike. The proposed development would be a direct response to the strategic vision (goals / objectives) for the Site, as set out in the Regional Strategies.

Environmental Impacts have been Minimised

Specialist consultants have assessed the risks and determined that the proposed development can be undertaken with minimal environmental impacts. No significant risk to the locality would result from the proposed development. Where impacts have been identified, these would be appropriately managed and mitigated through the compilation of mitigation measures and recommendations requiring adherence.

Compatibility with Surrounding Development

The proposed development use is compatible with existing uses on the Subject Site and adjacent land. The investigations undertaken as part of this application conclude that no significant cumulative impact is to occur from the proposed use for the purpose of a Warehouse and Distribution Facility.

Ecologically Sustainable Development

The principles of ecologically sustainable development as outlined in Clause 7(4) of the EPA Regulations are addressed as follows:

- *Precautionary Principle*
No unmanageable threat or irreversible damage to the environment has been identified in relation to the proposed development.
- *Inter-generational Equity*
No unreasonable use of resources, affectation of environmental processes or prevention of the use of land for future generations would occur from the proposed development.
- *Conservation of Biological Diversity and Ecological Integrity*
The Site has been previously disturbed. No processes, habitats or species outside the Site are likely to be significantly affected by the proposed development.
- *Improved Valuation, Pricing and Incentive Mechanisms*

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The proposed development seeks to implement measures to avoid, contain and address any associated waste or pollution through appropriate design and management.

The proposed development would effectively enable improved cost efficiencies in the provision of facilitating warehousing and distribution.

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PART I CONCLUSION

The proposed development (Warehouse and Distribution Facility) is defined as State Significant Development pursuant to Schedule 1 of *State Environment Planning Policy (State and Regional Development) 2011*.

Furthermore, the provisions outlined in *State Environmental Planning Policy (Western Sydney Employment Area) 2009* permit the proposed development.

No adverse environmental impacts are anticipated to result from the construction or pursuant operational phases of the proposed development. The proposed development is also suitably separated from sensitive areas and would be serviced by adequate infrastructure, including a capable road network. The minor environmental impact of the proposed development would be ensured by the implementation of the management mitigation measures as outlined in **Part F** of this EIS, formulated in response to the findings and recommendations of the specialist's reports provided within **Appendix 6 - 17**.

The proposed development is consistent with the objectives, provisions and strategies outlined within the *NSW 2021, Greater Sydney Region Plan*, and the *Western City District Plan*. The proposed development would contribute to economic growth and prosperity in accordance with these strategies / policies by supporting private enterprise, thereby creating employment opportunities in a site embarked for such development.

Based on the findings of this EIS, the proposed development supports the continued development of jobs in the Western Sydney Region and contributes to the retention and growth of warehousing and distribution. The proposed development is suitable for the local context and is appropriate based on social, cultural, economic and environmental considerations.

As such, it is recommended that the proposed development be supported by the Department of Planning and Environment.

Appendix 1 **Secretary's Environmental Assessment Requirements**

Appendix 2
Pre-DA (Pre-SEARs) Meeting Minutes

Environmental Impact Statement

Proposed Warehouse and Distribution Facility

Lot 7, 585-649 Mamre Road, Orchard Hills (Snack Brands)

Appendix 3 Quantity Surveyors Report

Environmental Impact Statement

Proposed Warehouse and Distribution Facility

Lot 7, 585-649 Mamre Road, Orchard Hills (Snack Brands)

Appendix 4 Subdivision Plan (As Approved Under SSD 7173)

Environmental Impact Statement

Proposed Warehouse and Distribution Facility

Lot 7, 585-649 Mamre Road, Orchard Hills (Snack Brands)

Appendix 5 Survey Plan

Environmental Impact Statement

Proposed Warehouse and Distribution Facility

Lot 7, 585-649 Mamre Road, Orchard Hills (Snack Brands)

Appendix 6 **Architectural Plans**

Environmental Impact Statement

Proposed Warehouse and Distribution Facility

Lot 7, 585-649 Mamre Road, Orchard Hills (Snack Brands)

Appendix 7 Landscape Plan

Environmental Impact Statement

Proposed Warehouse and Distribution Facility

Lot 7, 585-649 Mamre Road, Orchard Hills (Snack Brands)

Appendix 8 **Landscape Design Report**

Appendix 9 **Landscape and Visual Impact Assessment Report**

Appendix 10
Civil Plans and Waster Sensitive Urban Design Report

Appendix 11

Traffic Impact Assessment

Appendix 12

Air Quality and Odour Assessment

Environmental Impact Statement

Proposed Warehouse and Distribution Facility

Lot 7, 585-649 Mamre Road, Orchard Hills (Snack Brands)

Appendix 13 **Noise Impact Assessment**

Appendix 14 Ecologically Sustainable Development Report

Appendix 15

Waste Management Plan Report

Environmental Impact Statement

Proposed Warehouse and Distribution Facility

Lot 7, 585-649 Mamre Road, Orchard Hills (Snack Brands)

Appendix 16 **Bushfire Report**

Appendix 17
Building Code of Australia Report

Appendix 18

Consultation Letters

Appendix 19
Architectural Design Statement

Appendix 20
Operational Flow Diagram / Plan

Appendix 21

Automated Storage and Retrieval System