













This document has been prepared on behalf of Frasers Property Australia and Altis Property Partners by:

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Mamre Road South Precinct, 657-769 Mamre Road, Kemps Creek

SSD Application – Greenhouse Gas Assessment

Addressee(s): Frasers Property Australia and Altis Property Partners

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Final Authority

This report must by regarded as draft until the above study components have been each marked as final, and the document has been signed and dated below.

Martin Doyle

29th January 2019

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Non-Technical Summary

Frasers Property Australia and Altis Property Partners, have engaged Northstar Air Quality Pty Ltd to perform a greenhouse gas and energy efficiency assessment (GHG assessment), to support a State Significant Development (SSD) application, associated with the proposed development of a warehouse and distribution hub, located at 657-769 Mamre Road, Kemps Creek, NSW (the Proposal Site). The Proposal would form Stage 1 of the larger Mamre Road South Precinct.

The SSD application is submitted to allow development of the Proposal Site which would accommodate a number of warehouses and industrial facilities and associated office space (the Proposal).

The GHG assessment presents an assessment of the potential GHG emissions which may result during the operation of the Proposal and provide measures which are likely to be adopted to minimise energy use and maximise energy efficiency.

The prediction of potential impacts associated with operational activities has been performed adopting GHG emission factors as outlined within the National Greenhouse Accounts Factors Workbook, 2017. Emissions associated with all 10 warehouses/industrial facilities are anticipated to represent less than 0.003% of total NSW GHG emissions and less than 0.0008% of total Australian GHG emissions in 2016.

Emissions are further minimised by introducing a number of energy efficiency measures and the proponents are targeting six-star Green Star Design and As-Built v1.1 rating from the Green Building Council of Australia for the development, ensuring efficient energy usage.

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Units Used in the Report

All units presented in the report follow the International System of Units (SI) conventions, unless derived from references using non-SI units. In this report, units formed by the division of SI and non-SI units are expressed as a negative exponent, and do not use the solidus (/) symbol. *For example*, 50 micrograms per cubic metre would be presented as $50 \, \mu g \cdot m^{-3}$ and not $50 \, \mu g / m^{3}$.

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Common Abbreviations

Abbreviation	Term
CO ₂ -e	carbon dioxide equivalent
DoEE	Department of Environment and Energy
EPA	Environmental Protection Authority
ESS	Energy Savings Scheme
DP&E	Department of Planning and Environment
GHG	greenhouse gas
kWh	kilowatt hour
m ²	square metre
NGA	National Greenhouse Accounts
OEH	NSW Office of Environment and Heritage
PV	photovoltaic
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SSD	State Significant Development
WRI	World Resources Institute
WSEA	Western Sydney Employment Area

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1. Introduction

Frasers Property Australia and Altis Property Partners, have engaged Northstar Air Quality Pty Ltd (Northstar) to perform a greenhouse gas and energy efficiency assessment (GHG assessment), to support a State Significant Development (SSD) application, associated with the proposed development of a warehouse and distribution hub, located at 657-769 Mamre Road, Kemps Creek, NSW (the Proposal Site). The Proposal would form Stage 1 of the larger Mamre Road South Precinct.

The SSD application is submitted to allow development of the Proposal Site which would accommodate a number of warehouses and industrial facilities and associated office space (the Proposal).

The GHG assessment presents an assessment of the potential GHG emissions which may result during the operation of the Proposal and provide measures which are likely to be adopted to minimise energy use and maximise energy efficiency.

1.1. Assessment Requirements

NSW Department of Planning and Environment (DP&E) issued Secretary's Environmental Assessment Requirements (SEARs) for the Proposal in September 2018. No specific SEARS associated with GHG and energy efficiency have been included, although **Table 1** below identifies generic SEARs associated with previous proposals which have been given due consideration within the performance of this assessment. The section of the report where the generic requirement has been addressed is provided in **Table 1** below.

Table 1 Generic SEARS requirements for GHG and Energy Efficiency report

Issue	Requirement	Addressed
Greenhouse Gas and	• including an assessment of the energy use on site and demonstrate	Section 5
Energy Efficiency	what measures would be implemented to ensure the proposal is	
	energy efficient.	



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2. The Proposal

The following provides a description of the context, location, and scale of the Proposal.

2.1. Environmental Setting

The Proposal Site is located at 657-769 Mamre Road, Kemps Creek, NSW. The Proposal Site is located within the Local Government Area (LGA) of Penrith. A map showing the location of the Proposal Site is provided in **Figure 1** below.

Gredute Ratio

Gredut

Figure 1 Proposal site location

Image courtesy of Google Maps

The land on which the Proposal Site is situated is currently zoned as RU2 (Rural Landscape) and E2 (Environmental Conservation). Lands to the immediate north and northeast of the Proposal Site are currently zoned as IN1 (General Industrial).



2.2. Overview and Purpose

The Proposal seeks to gain approval to develop the subject land to accommodate a number of warehouses, industrial sheds and freight handling facilities. Although the exact use or tenant of each of the proposed 10 warehouse and industrial facilities proposed under this SSD application is not currently known, it is anticipated that the site would be occupied and operated in a similar nature to the approved Orchard Hills development, located to the immediate north, at 585-649 Mamre Road.

A layout of the Proposal Site is provided in **Figure 2** below.

Northstar
AIR QUALITY

0 100 200 300 m

Wis 84 UTM Zone 56

Legend

Propose 3 die
Stage it warehouse and industrial facility (WHS)
Mame Road South Precinct
Existing floodplain
Freight rail corridor

WHS 09

WHS 11

WHS 10

Figure 2 Proposed site layout



3. Legislation, Regulation and Guidance

3.1. Federal Legislation

The Australian Government Clean Energy Regulator administers schemes legislated by the Australian Government for measuring, managing, reducing or offsetting Australia's carbon emissions.

The scheme administered by the Clean Energy Regulator of most relevance to the Proposal is the National Greenhouse and Energy Reporting (NGER) Scheme, under the *National Greenhouse and Energy Reporting Act* (2007) (NGER Act).

3.1.1. National Greenhouse and Energy Reporting Scheme

The NGER scheme, established by the NGER Act, is a national framework for reporting and disseminating company information about greenhouse gas emissions, energy production, energy consumption and other information specified under NGER legislation.

The objectives of the NGER scheme are to:

- inform government policy;
- inform the Australian public;
- help meet Australia's international reporting obligations;
- assist Commonwealth, state and territory government programmes and activities; and,
- avoid duplication of similar reporting requirements in the states and territories.

Further information on the NGER scheme, specifically the definitions of various scopes and types of GHG emissions which have also been adopted for the purposes of this assessment, is provided in **Section 4**.

3.2. Relevant State Legislation

There is no specific GHG legislation administered within NSW. The NGER scheme is the applicable legislation within NSW.

The NSW Government is working to deliver economically efficient and environmentally effective policies and programs that do not duplicate initiatives of the Australian Government. They include:

- understanding NSW emissions;
- providing financial support through the Climate Change Fund;
- promoting energy efficiency (e.g. through the Energy Savings Scheme [ESS]); and,
- promoting soil carbon sequestration.



3.3. Guidance

The GHG accounting and reporting principles adopted within this GHG assessment are based on the following financial accounting and reporting standards:

- Australian Government Department of the Environment, Australian National Greenhouse Accounts, National Greenhouse Accounts Factors, July 2017 (DoEE, 2017);
- The World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD) GHG Protocol: A Corporate Accounting and Report Standard (WRI, 2004);
- ISO 14064-1:2006 (Greenhouse Gases Part 1: Specification with guidance at the organisation level for quantification and reporting of GHG emissions and removal;
- ISO 14064-2:2006 (Greenhouse Gases Part 2: Specification with guidance at the project level for quantification, monitoring and reporting of GHG emission reductions or removal enhancements); and,
- ISO 14064-3:2006 (Greenhouse Gases Part 3: Specification with guidance for the validation and verification of GHG assertions) guidelines (internationally accepted best practice).

Further detail is provided in Section 4.

3.4. State Environmental Planning Policy (Western Sydney Employment Area) 2009

State Environmental Planning Policy (Western Sydney Employment Area) 2009 (the WSEA SEPP) aims to protect and enhance the Western Sydney Employment Area for employment purposes. The WSEA SEPP aims:

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



The Western Sydney Employment Area covers the area shown in **Figure 3**. The location of the Proposal Site is also shown (as added by Northstar), indicating that the entirety of the site is located within the area covered by the WSEA SEPP and therefore the requirements/aims of the WSEA SEPP apply to the Proposal Site.

Planning & Environmental Planning Policy (Western Sydney Environment

Figure 3 Western Sydney Employment Area – Land application map

Source: New South Wales Government (https://legislation.nsw.gov.au/#/view/EPI/2009/413/maps) SEPP_WSEA_LAP_001_080_20160204, and adapted by Northstar Air Quality

The Proposal Site is currently zoned as RU2 (Rural Landscape) and E2 (Environmental Conservation) with rezoning to IN1 (General Industrial) and E2 (Environmental Conservation) being sought. Lands to the immediate north and northeast of the Proposal Site have already been rezoned to IN1 (General Industrial).

The WSEA SEPP outlines the objectives of each permitted zone, which are reproduced below for both IN1 (General Industrial) and E2 (Environmental Conservation):

Zone IN1 General Industrial

The objectives of zone IN1 (General Industrial) are:

- To facilitate a wide range of employment-generating development including industrial, manufacturing, warehousing, storage and research uses and ancillary office space;
- To encourage employment opportunities along motorway corridors, including the M7 and M4;
- To minimise any adverse effect of industry on other land uses;



- To facilitate road network links to the M7 and M4 Motorways;
- To encourage a high standard of development that does not prejudice the sustainability of other enterprises or the environment; and,
- 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.

Warehouse or distribution centres are permitted with consent within this land use zoning.

Zone E2 Environmental Conservation

The objectives of zone E2 (Environmental Conservation) are:

- To provide for infrastructure and related uses,; and,
- To prevent development that is not compatible with or that may detract from the provision of infrastructure.

Roads are permitted with consent within this land use zoning.

The proposed development meets the requirements and objectives of the WSEA SEPP. This GHG assessment seeks to demonstrate that the proposed development would be constructed and operated so as not to prejudice the sustainability of the environment, and to minimise impacts upon the environment.



4. Methodology

4.1. Emission Types

The Australian Government Department of the Environment (DoE) document, "National Greenhouse Accounts Factors" Workbook (NGA Factors) (DoEE, 2017) defines two types of GHG emissions (see **Table 2**), namely 'direct' and 'indirect'. This assessment considers both direct emissions and indirect emissions resulting from Proposal construction and operation.

Table 2 Greenhouse gas emission types

Emission Type	Definition
Direct	Produced from sources within the boundary of an organisation and as a result of that organisation's activities (e.g. consumption of fuel in on-site vehicles)
Indirect	Generated in the wider economy as a consequence of an organisation's activities (particularly from its demand for goods and services), but which are physically produced by the activities of another organisation (e.g. consumption of purchased electricity).

Note: Adapted from NGA Factors Workbook (DoEE, 2017)

4.2. Emission Scopes

The NGA Factors (DoEE, 2017) identifies two 'scopes' of emissions for GHG accounting and reporting purposes as shown in **Table 3**.

Table 3 Greenhouse gas emission scopes

Emission Scope	Definition
Scope 1	Direct (or point-source) emission factors give the kilograms of carbon dioxide equivalent (CO ₂ -e) emitted per unit of activity at the point of emission release (i.e. fuel use, energy use, manufacturing process activity, mining activity, on-site waste disposal, etc.). These factors are used to calculate Scope 1 emissions.
Scope 2	Indirect emission factors are used to calculate Scope 2 emissions from the generation of the electricity purchased and consumed by an organisation as kilograms of CO ₂ -e per unit of electricity consumed. Scope 2 emissions are physically produced by the burning of fuels (coal, natural gas, etc.) at the power station.

Note: Adapted from NGA Factors Workbook (DoEE, 2017)



A third scope of emissions, Scope 3 Emissions, are also recognised in some GHG assessments. The Greenhouse Gas Protocol (GHG Protocol) (WRI, 2004) defines Scope 3 emissions as "other indirect GHG emissions":

"Scope 3 is an optional reporting category that allows for the treatment of all other indirect emissions. Scope 3 emissions are a consequence of the activities of the company, but occur from sources not owned or controlled by the company. Some examples of Scope 3 activities are extraction and production of purchased materials; transportation of purchased fuels; and use of sold products and services."

Scope 3 emissions have not been considered within this assessment.

4.3. Emission Source Identification

The geographical boundary set for the GHG assessment covers the Proposal Site and does not include the transport of materials to and from the Proposal Site (as defined above). Emissions associated with Proposal construction and all associated mobile plant and equipment are not included in this assessment, as the ongoing energy efficiency of the Proposal operation is considered to be of greater concern.

The GHG emission sources associated with the operation of the Proposal have been identified through review of the proposed broad activities as described in **Section 2**. The individual tenants of each of the 11 warehouses/industrial facilities is not currently known, and information relating to the consumption of electricity has been determined through review of similar existing built and operating facilities in NSW, VIC and QLD (refer **Section 4.4**).

The activities/operations being performed as part of the Proposal which have the potential to result in emissions of GHG are presented in **Table 4**.

Table 4 Greenhouse gas emission sources

Proposal Component	Scope	Emission Source Description
Consumption of purchased electricity	2	Emissions associated with the generation of electricity from fossil fuel combustion



No scope 1 emissions associated with the consumption of unleaded fuel, diesel fuel or natural gas are anticipated during the operation of the warehouses. Fuel would be combusted in vehicles using the Proposal (i.e. heavy good vehicles etc.) although this assessment is concerned with the energy efficiency of the Proposal Site rather than the transportation of goods and materials.

4.4. Emissions Estimation

Emissions of GHG from the source identified in **Table 4** have been calculated using activity data for the source per annum (i.e. kWh electricity) and the relevant emission factor for each source.

The assumptions used in the calculation of activity data for the emission source and emission factors are presented below.

4.4.1. Activity Data

The assumptions relating to activity data are outlined in **Table 5**. This value represents the operation of all 10 warehouse, distribution and industrial facilities (including offices) at the Proposal Site and is based on data for similar facilities in NSW, VIC and QLD as provided by Frasers. These data indicate that the operation of similar facilities result in the consumption of 34.5 kWh·m⁻² of floor space per year, averaged across seven facilities. This average value is close to the NSW value of 37.4 kWh·m⁻² of floor space per year and is considered to be appropriate.

The total floor space of the Proposal, covering all 10 warehouses is 154,346 m².

Table 5 Calculated activity data

Proposal Component	Assumptions		Units
Consumption of purchased	Based on information provided by Frasers (averaging	5,332,551	kWh
electricity	34.5 kWh·m ⁻² ·year ⁻¹)		

4.4.2. Emission Factors

Emissions factors used for the assessment of GHG emissions associated with the operation of the Proposal have been sourced from the NGA Factors (DoEE, 2017) (refer to **Table 6**).

Table 6 Greenhouse gas emission factors

Emission Scope	Emission Source	Emission Factor
Scope 2	Electricity (NSW)	0.83 kg CO ₂ -e·kWh ⁻¹



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5. Assessment Outcomes

5.1. Quantification of Greenhouse Gas Emissions

Based on the activity data for the operation of the Proposal and the emission factor as outlined in **Section 4.4**, annual GHG emissions have been calculated and are presented in **Table 7**.

Indirect (Scope 2) emissions are anticipated to be 4,426.0 t CO₂-e per annum.

Table 7 Calculated proposal GHG emissions

Emission Scope	Emission Source	GHG Emissions (t CO ₂ -e per annum)
Scope 2	Purchased electricity consumption	4,426.0
	TOTAL Scope 2	4,426.0

5.2. Greenhouse Gas Emissions in Context

A comparison of the calculated GHG emissions associated with the Proposal and the NSW and Australia total emissions in 2016 is presented **Table 8**.

These data indicate that the operation of the Proposal in its entirety would contribute less than 0.003% of NSW total GHG emissions and less than 0.0008% of Australian total GHG emissions in 2016.

Table 8 Proposal GHG emissions in context

Proposal Phase	Emissions (t CO ₂ -e per annum)		
	Proposal	NSW (2016)	Australia (2016)
		Total	Total
		130,273,520	532,971,150
Operation	4,426.0	<0.003 %	<0.0008 %

5.3. Discussion

The GHG assessment indicates that during Proposal operation, emissions are likely to be small and contribute less than 0.003% of the NSW 2016 emission total.



Emissions are further minimised by introducing a number of energy efficiency measures. Frasers is targeting six-star Green Star Design and As-Built v1.1 rating from the Green Building Council of Australia for the Proposal. The key initiatives that relate to the sustainability performance of the Proposal site are outlined in **Table 9**.

Table 9 Key initiatives for six-star Green Star Proposal

Energy			
Building fabric	10% improvement on BCA – double glazing, increased façade and roof insulation		
Translucent sheeting	10% of warehouse roof		
Hot water system	Heat pump (air source or geothermal)		
Office heating and cooling	Geothermal – reverse cycle ducted		
Office outside air	Min 50% increase on OA		
Lighting – office	LED with individual control		
Lighting – warehouse	LED with daylight control		
Lighting – external	LED with time clock control		
Renewable energy	Solar PV system (100 kW)		
Energy storage	Customer dependent		
Electric vehicle charging	Included		
Water			
Water fixtures	5- & 6-star WELS rated		
Recycled water	Rainwater for 80%+ irrigation and toilet flushing		
Fire test water recycling	80%+ of fire test water recycled		
Sub-metering	Electricity and water with web-based monitoring system		
Commissioning	Commissioning manager and plan		



6. Conclusion

Frasers Property Australia and Altis Property Partners, have engaged Northstar Air Quality Pty Ltd to perform a greenhouse gas and energy efficiency assessment (GHG assessment), to support a State Significant Development (SSD) application, associated with the proposed development of a warehouse and distribution hub, located at 657-769 Mamre Road, Kemps Creek, NSW (the Proposal Site). The Proposal would form Stage 1 of the larger Mamre Road South Precinct.

The SSD application is submitted to allow development of the Proposal Site which would accommodate a number of warehouses and industrial facilities and associated office space (the Proposal).

The GHG assessment presents an assessment of the potential GHG emissions which may result during the operation of the Proposal and provide measures which are likely to be adopted to minimise energy use and maximise energy efficiency.

The prediction of potential impacts associated with operational activities has been performed adopting GHG emission factors as outlined within the National Greenhouse Accounts Factors Workbook, 2017. Emissions associated with all 35 warehouses/industrial facilities are anticipated to represent less than 0.003% of total NSW GHG emissions and less than 0.0008% of total Australian GHG emissions in 2016.

Emissions are further minimised by introducing a number of energy efficiency measures and the proponents are targeting six-star Green Star Design and As-Built v1.1 rating from the Green Building Council of Australia for the development, ensuring efficient energy usage.



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