ETHOS URBAN

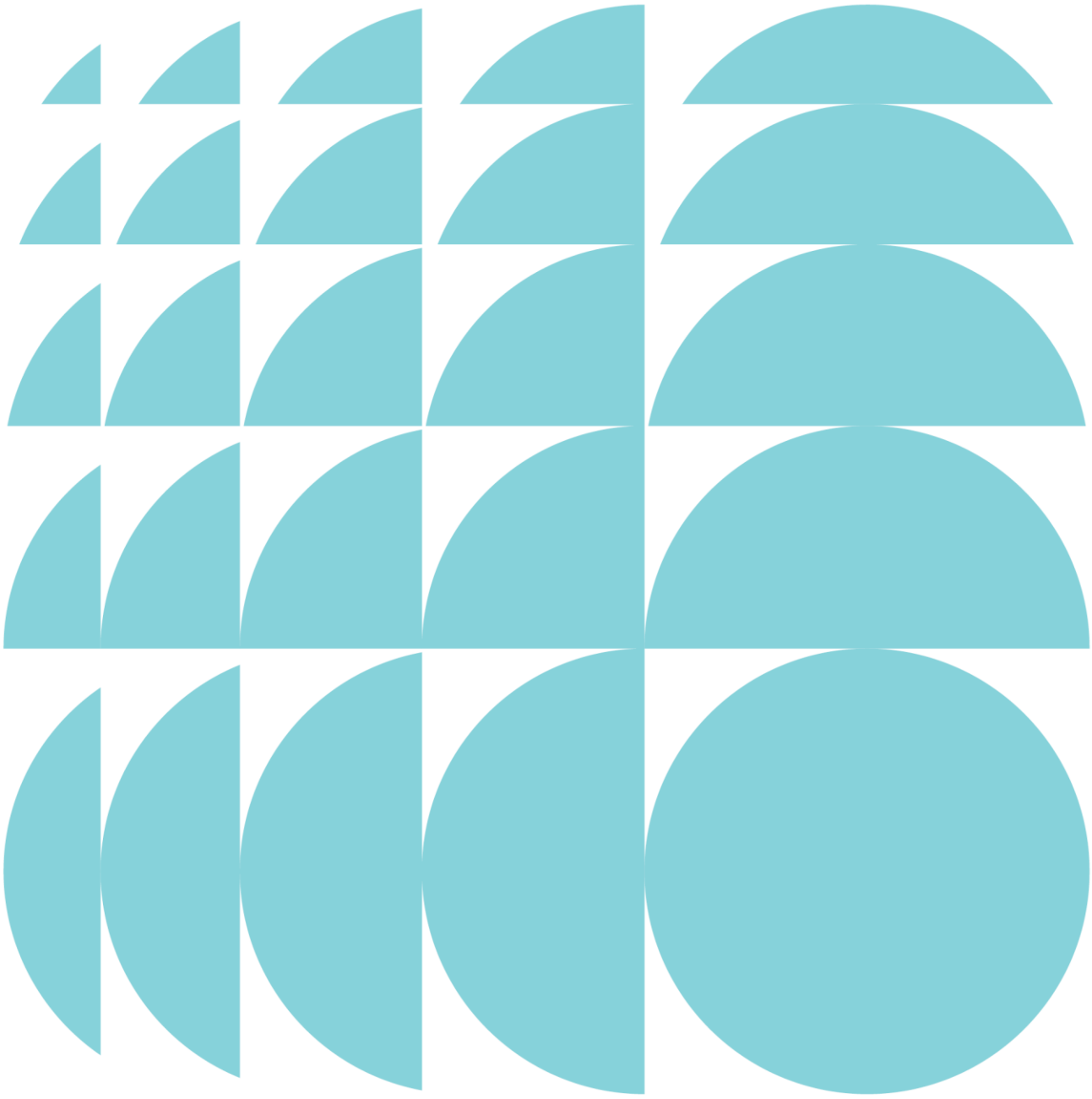
Environmental Impact Statement

290-308 Aldington Road, 59-62 Abbotts Road &
63 Abbotts Road, Kemps Creek
Westlink Industrial Estate

SSD-9138102

Submitted to the Department of Planning, Industry and Environment
On behalf of ESR

17 June 2021 | 2200446



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Statement of validity

Development Application Details		
Applicant name	ESR Developments (Australia) Pty Ltd	
Applicant address	Level 29, 20 Bond St, Sydney 2000	
Land to be developed	290-308 Aldington Road, 59-62 Abbotts Road, and 63 Abbotts Road, Kemps Creek	
Proposed development	Redevelopment for the site as an industrial estate comprising 8 industrial buildings across 7 allotments	
Prepared by		
Name	Christopher Curtis	Gordon Kirkby
Qualifications	BUrbanEnvPlan MPIA DipPM	BEc Dip URP MPIA
Address	173 Sussex Street, Sydney	
In respect of	State Significant Development - Development Application	
Certification		

I certify that I have prepared the content 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;
- all available information that is relevant to the environmental assessment of the development to which the statement relates; and
- the information contained in the statement is neither false nor misleading.

Signature		
Name	Christopher Curtis	Gordon Kirkby
Date	17 June 2021	

Executive summary

This Environmental Impact Statement (EIS) is submitted to the Department of Planning, Industry and Environment (DPIE) pursuant to Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) in support of a State Significant Development Application (SSDA) for the development of land identified at 290-308 Aldington Road, 59-62 Abbotts Road, and 63 Abbotts Road, Kemps Creek (the site) for the purposes of an industrial estate known as Westlink (formerly known as the Kemps Creek Logistics Park).

As the proposal is for the purposes of development for warehouse or distribution centres with a Capital Investment Value (CIV) in excess of $30 million, it is State Significant Development (SSD) by virtue of Clause 12 of Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* (SEPP SRD).

This SSDA seeks approval for the following development:

- Site preparatory works, including:
  - Demolition and clearing of all existing built form structures and vegetation;
  - Bulk earthworks including 'cut and fill' to create flat development platforms for the proposed buildings, and topsoiling, grassing and site stabilisation works;
- Subdivision of the site into 7 individual lots;
- Construction of a new industrial estate at the site comprising 7 allotments and a total gross leasable area of 158,185m^2, including:
  - 7 new industrial warehousing buildings with ancillary offices across 6 allotments, comprising:
    - 151,935m^2 of warehousing floorspace; and
    - 6,250m^2 of ancillary office floorspace;
  - 1 new on-site retail café building comprising 200m^2 of floorspace;
- Construction of a new internal road layout and parking for 777 vehicles;
- Associated site servicing works and ancillary facilities, including OSD detention basin;
- Associated site landscaping; and
- Works-in-kind (WIK) arrangements through a Voluntary Planning Agreement (VPA) for external road upgrades including to Aldington and Abbotts Road, and a new signalised intersection at Mamre and Abbotts Road.

The proposal will be undertaken in accordance with the Architectural Plans prepared by Nettleton Tribe at **Appendix A**, informed by the Urban Design Report prepared by Nettleton Tribe at **Appendix B**.

This EIS considers and assesses a range of environmental issues including permissibility, infrastructure requirements, visual impact, traffic and transport impact, the road network, soil and water impacts, noise and vibration, hazard and risk, biodiversity impact, heritage impact, Aboriginal heritage impact, social and economic impact, contamination and geotechnical considerations, bushfire impact, air quality, waste management, Ecologically Sustainable Development, Building Code of Australia, and signage impacts.

Having regard to environmental, economic, and social considerations, including the principles of ecologically sustainable development, the carrying out of the project is justified for the following reasons:

- The proposal is permissible with consent and meets the relevant statutory requirements of the relevant environmental planning instruments, including *State Environmental Planning Policy (Western Sydney Employment Area) 2009* (WSEA SEPP);
- The proposal is consistent with the desired future character of the area and relevant strategic planning documentation, including the Greater Sydney Region Plan and Mamre Road Structure Plan;
- The proposal will not result in adverse environmental impacts, will contribute much-needed industrial land in Western Sydney, and will provide significant employment outcomes during both construction and operation; and
- The proposal is suitable for the site and in the public interest.

1.0 Introduction

This Environmental Impact Statement (EIS) is submitted to the Department of Planning, Industry and Environment (DPIE) pursuant to Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) in support of a State Significant Development Application (SSDA) for the development of land identified at 290-308 Aldington Road, 59-62 Abbotts Road, and 63 Abbotts Road, Kemps Creek (the site) for the purposes of an industrial estate known as Westlink (formerly known as the Kemps Creek Logistics Park).

As the proposal is for the purposes of development for warehouse or distribution centres with a Capital Investment Value (CIV) in excess of $30 million, it is State Significant Development (SSD) by virtue of Clause 12 of Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* (SEPP SRD).

This EIS has been prepared by Ethos Urban on behalf of ESR Developments (Australia) Pty Ltd (ESR) and is based on the Architectural Plans prepared by Nettleton Tribe (**Appendix A**) and other supporting technical documentation appended to the report (refer to Table of Contents).

This EIS has been prepared in accordance with the requirements of Part 4 of the EP&A Act, Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) and the relevant Secretary's Environmental Assessment Requirements (SEARs), which have been included at **Appendix C**. This EIS should be read in conjunction with the supporting information and plans appended to and accompanying this report.

1.1 Site vision

ESR's vision for the site involves the delivery of a high-quality industrial estate at 290-308 Aldington Road, 59-62 Abbotts Road, and 63 Abbotts Road, Kemps Creek that integrates with and supports the establishment and transition of the Mamre Road Precinct into a new warehousing industrial hub and contributes to the overall provision of in-demand industrial land in Western Sydney.

This SSDA establishes the finer grain planning framework to deliver on this vision for a new industrial estate, which will:

- Establish the Mamre Road Precinct within Western Sydney as the foremost area for high-quality industrial developments and industrial employment land by delivering in-demand industrial floor space that will support significant employment growth, in a high-quality, sustainable and innovatively designed industrial estate;
- Accommodate emerging opportunities in future warehousing and logistics practice through the creation of a 'next-gen' industrial workplace;
- Deliver a development consistent with the underlying principles of the Western Parkland City in relation to the integration of landscaping and tree canopy elements by virtue of the sites scale and frontage;
- Ensure a high standard of architectural, urban and landscape design to ensure the provision of a highly recognisable and high quality development within the emerging Mamre Road Precinct; and
- Support the environmental performance of the Mamre Road Precinct through sustainability initiatives of the highest level.

The SSD leverages off the site's strategic location within the Mamre Road Precinct to deliver significant warehousing and employment generating floorspace whilst minimising environmental impacts, and not comprising the amenity of surrounding land. The site benefits from proximity to existing road infrastructure, including significant freight corridors (the M4 and M7 motorways) as well as the future planned Western Sydney Freight Line and Outer Sydney Orbital.

The future redevelopment of the site is in full alignment with the objectives and intended outcomes established by the site's recent rezoning (June 2020) within the Mamre Road Precinct. In particular, it supports the development of land for industrial purposes, contributes to new industrial land supply in Western Sydney, and facilitates job creation in line with the 17,000 jobs additional jobs anticipated for the precinct.

1.2 Development objectives

In line with the site vision as set out above, the primary objective of the proposal is to facilitate the development of a new industrial warehouse estate on the site. This will support the need for additional industrial floorspace within the Western Sydney Employment Area (WSEA), help realise the recently established vision for the Mamre Road Precinct and contribute towards much-needed industrial land supply in Western Sydney.

Therefore, the objectives of the proposal can be summarised as follows:

- Establish the Mamre Road Precinct within Western Sydney as the foremost area for high-quality industrial developments and industrial employment, delivering on the vision for the Precinct and the recent amendments to the WSEA SEPP;
- Increase the variety and availability of industrial floorspace and facilities in the WSEA to respond to the well-publicised shortfall in industrial land in Western Sydney;
- Promote the efficient use of land from the single site arrangement and development intention through providing industrial floor space within a designated employment area; and
- Deliver a development integrating landscaping and tree canopy elements and ensuring a high standard of architectural, urban and landscape design within the emerging Mamre Road Precinct.

1.3 Overview of the proposed development

This SSDA seeks approval for the following development:

- Site preparatory works, including:
  - Demolition and clearing of all existing built form structures and vegetation;
  - Bulk earthworks including 'cut and fill' to create flat development platforms for the proposed buildings, and topsoiling, grassing and site stabilisation works;
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- Construction of a new internal road layout and parking for 777 vehicles;
- Associated site servicing works and ancillary facilities, including OSD detention basin;
- Associated site landscaping; and
- Works-in-kind (WIK) arrangements through a Voluntary Planning Agreement (VPA) for external road upgrades including to Aldington and Abbotts Road, and a new signalised intersection at Mamre and Abbotts Road.

Further detail and discussion of the proposed development is provided in **Section 3** below. The proposal will be undertaken in accordance with the Architectural Plans prepared by ESR at **Appendix A**, with project staging to occur as per the Staging Plans prepared by ESR at **Appendix B**.

1.4 Existing planning framework

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

The site is located within the Mamre Road Precinct ('the Precinct'; **Figure 1**) and as aforementioned, the primary objective of this SSDA is to facilitate the redevelopment of the site for industrial purposes, in accordance with the desired future outcomes of the Precinct, and recent amendments (which occurred in June 2020) to the *State Environmental Planning Policy (Western Sydney Employment Area) 2009* (the WSEA SEPP), which provides

consistent zoning and development control provisions to facilitate development of the WSEA for the purposes of employment and industry.

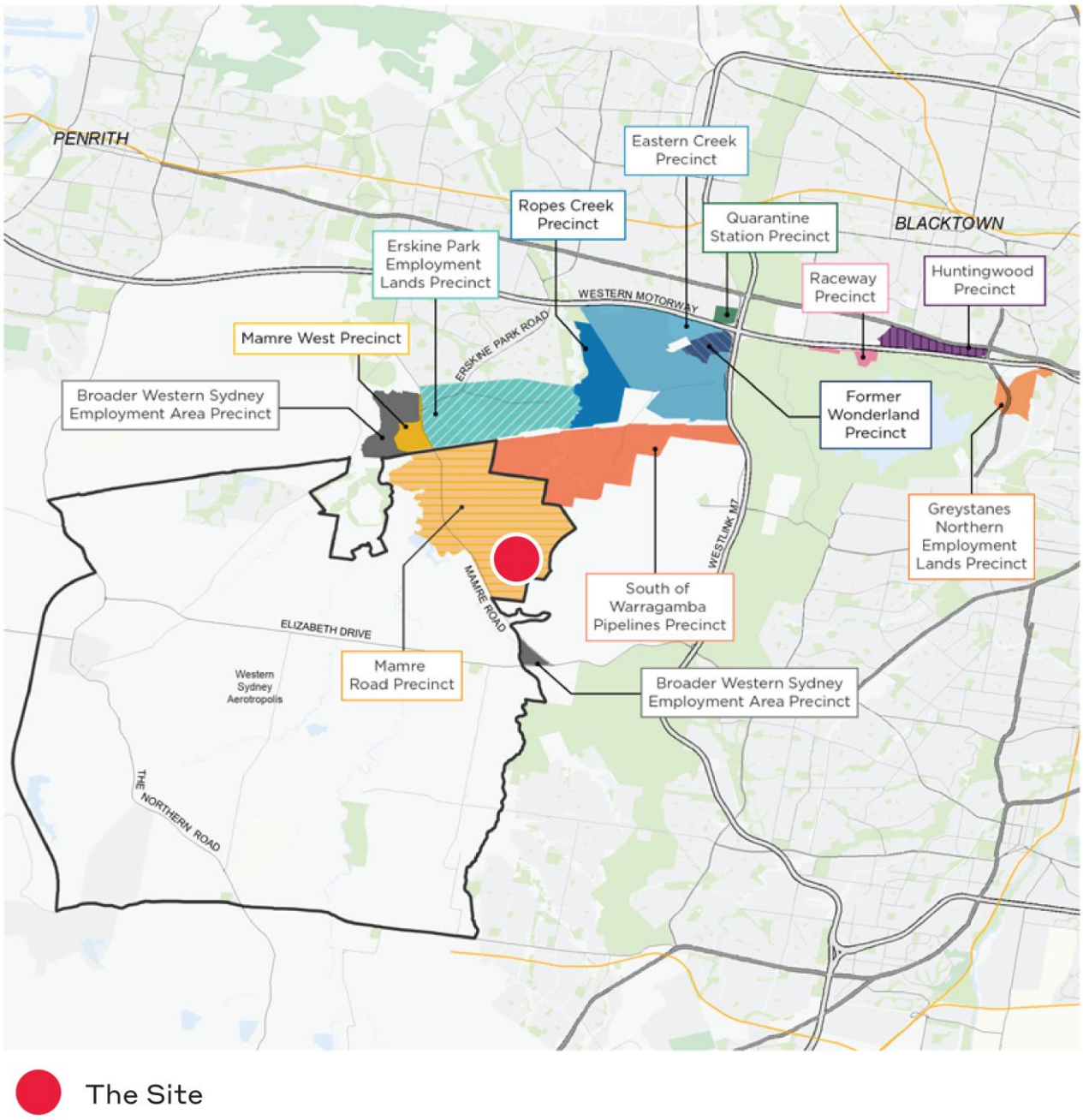

Figure 1 Location of the site within the Western Sydney Employment Area Structure Plan

Source: DPIE, edits by Ethos Urban

The recent amendments to the WSEA SEPP (gazetted on 12 June 2020) extended the controls of the SEPP to include the Mamre Road Precinct and rezoned the Precinct for General Industrial purposes (IN1), with additional areas zoned for Private Recreation (RE2), Environmental Conservation (E2) and Infrastructure (SP2). The intent of the amendments was to facilitate and transform the Mamre Road Precinct into a future industrial hub, capable of supporting in-demand industrial land supply.

As per the WSEA SEPP, the entirety of the site is zoned IN1 General Industrial (**Figure 2**). The uses proposed as part of the SSDA are permissible with consent under the zoning for the site.

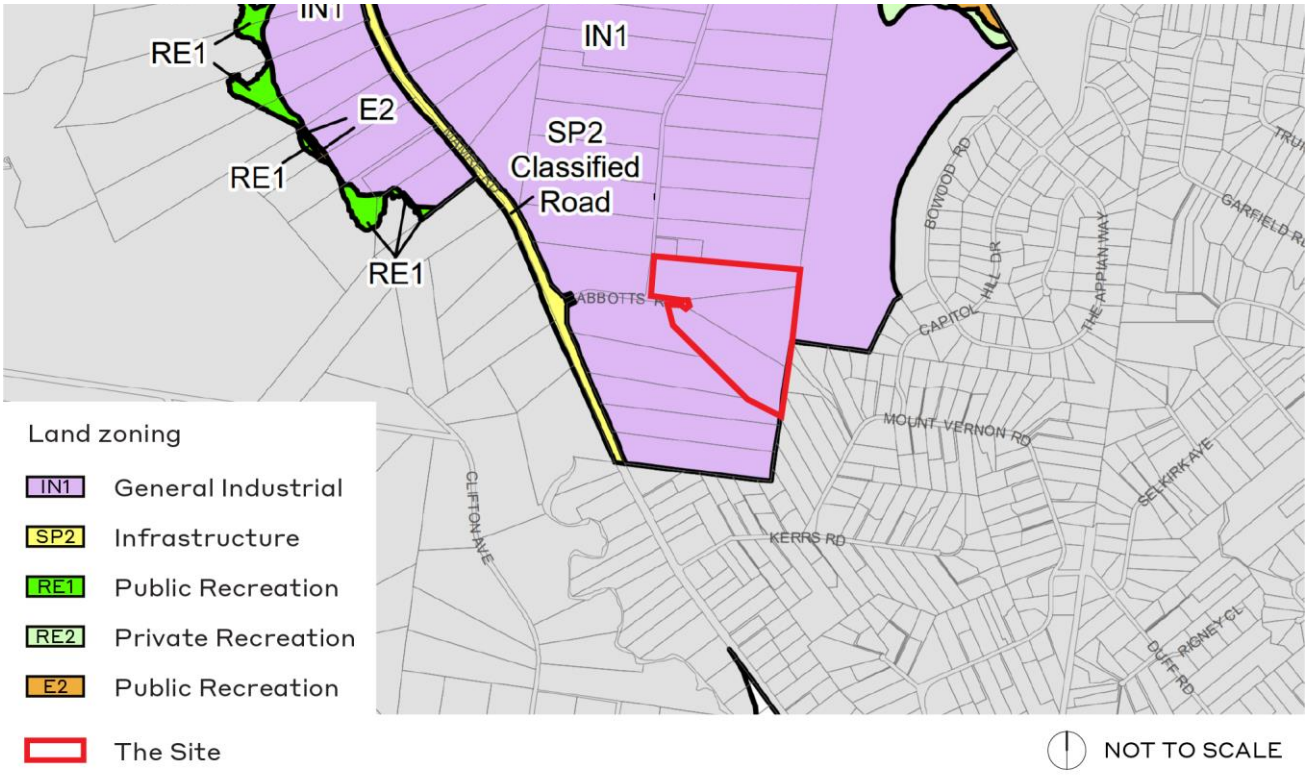

Figure 2 Zoning controls for the site

Source: SWEA SEPP, edits by Ethos Urban

1.4.2 Mamre Road Structure Plan

Complementary to SEPP WSEA is the Mamre Road Precinct Structure Plan, which sets out the desired long term outcomes for the Precinct. Under the Structure Plan, the site is proposed for industrial land (**Figure 3**). The eastern boundary of the site has been identified as 'Transition to rural', and hence must be compatible with the adjacent R5 Large Lot Residential zoning at Mount Vernon (refer to **Section 5.4** below).

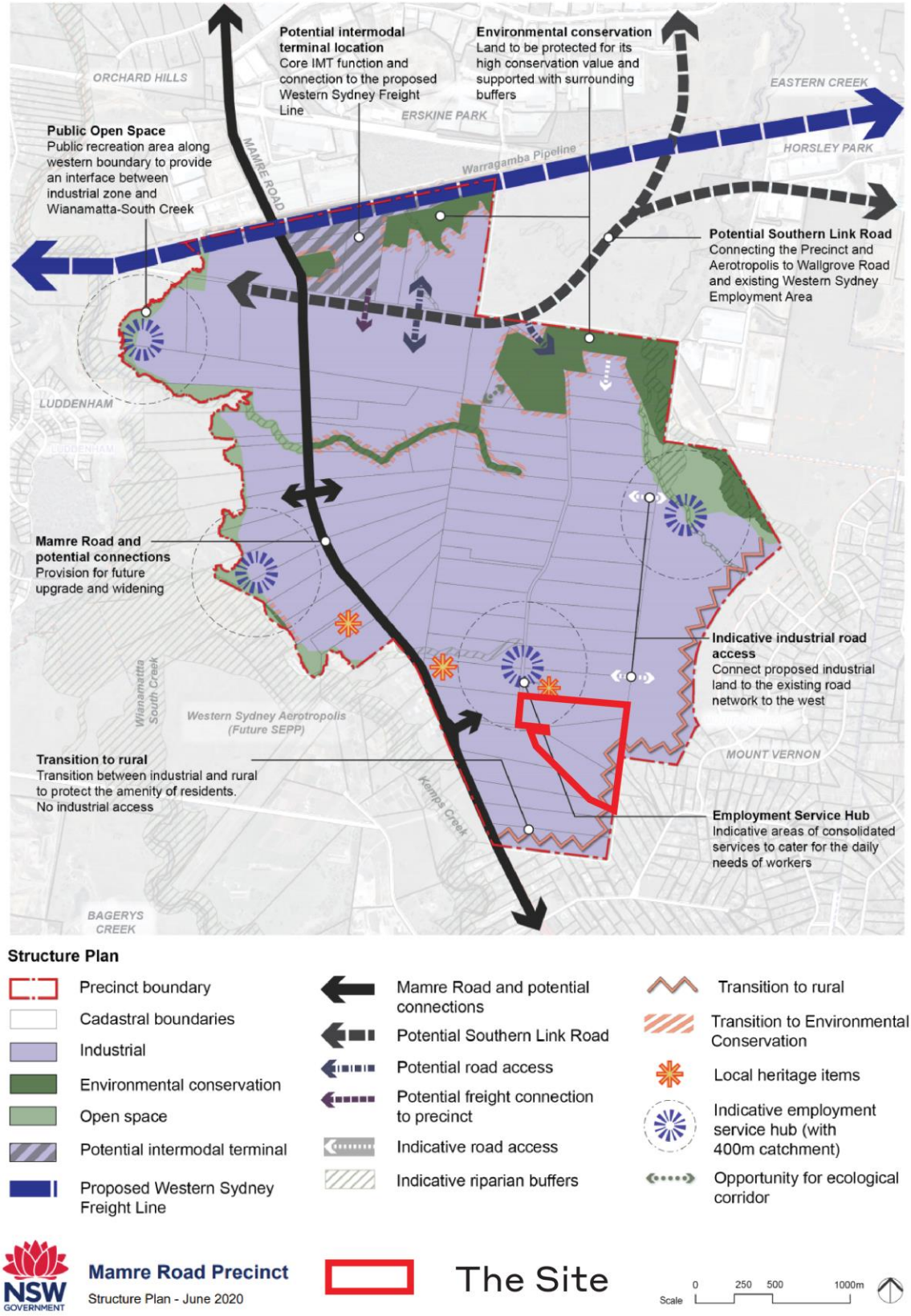

Figure 3 Mamre Road Precinct Structure Plan, in relation to the site

Source: DPIE, edits by Ethos Urban

1.5 Strategic need for the proposal

The WSEA is the largest employment area in Western Sydney and has delivered over 1,000 hectares of industrial land over the past 10 years. Recent demand for industrial floorspace within the WSEA is attributed to its proximity to major existing road and freight corridors, including the M4 and M7 motorways, as well as the future Western Sydney Freight Line, Outer Sydney Orbital and Southern Link Road.

One of the driving priorities for Sydney's overarching strategic planning document, *Greater Sydney Regional Plan: A Metropolis of Three Cities,* is the planning, retention, and management of industrial and urban services land. As mentioned in **Section 1.4**, the site was recently rezoned for industrial purposes, and this proposal will facilitate development in accordance with its intended use.

Being located in the WSEA, the site is suitable for the scale and land use mix proposed and will support the provision of jobs and contribute to the '30-minute City' by bringing more jobs to Western Sydney. Further, the proposal will contribute to the establishment of approximately 17,000 jobs and 780 hectares of industrial land envisioned for the Mamre Road Precinct following its recent rezoning.

1.6 Analysis of alternatives

Development options for the site are primarily limited by the WSEA SEPP, which zones the site IN1 for the purposes of 'General Industrial' development. The site does not permit other forms of development (such as retail, general office or retail) and the type of industrial premise proposed is directly in accordance with the demand and intended outcome for the site under its recent rezoning.

During the design process of the proposed development, alternative development options for the site were explored. This included the following:

- Do nothing;
- Use of the site for an alternate purpose; and
- Use of the site as an industrial warehousing estate (the proposed development).

1.6.1 Do nothing

Doing nothing (and retaining the current rural-residential usage of land at the site) would represent a significant missed opportunity that is contrary to the envisioned usage of the site under the WSEA SEPP and the desired future outcomes of the Mamre Road Precinct. Doing nothing would fail to support the orderly development of industrial land at the site (which is the intention of the recent rezoning) and fail to contribute towards the provision of jobs within the Mamre Road Precinct.

Doing nothing would therefore be an inappropriate course of action that would prevent the development of the site for its highest and best use. It would also be inconsistent with surrounding land uses, given recent trends in the applications for industrial development within the Mamre Road Precinct and broader WSEA.

1.6.2 Use of the site for an alternate purpose

As aforementioned, usage of the site for an alternate purpose is generally not appropriate given the General Industrial zoning of the site. Using the site for non-industrial uses would also be inconsistent with the desired outcomes of the WSEA SEPP and therefore would be an inappropriate course of action.

1.6.3 Use of the site as an industrial warehousing estate (the proposed development)

Therefore, given the aforementioned factors and unique opportunities offered by the site as an unconstrained large parcel of land under single ownership, the usage of the site as an industrial warehousing estate (the chosen option) is considered to represent the highest and best use of the site, that is most consistent with the desired future character of the area.

The current site layout has been informed through an extensive development process that has considered site-specific opportunities and constraints (including access to Abbotts Road), flooding and ecology, need for

earthworks, internal access arrangements and manoeuvrability, construction feasibility, staging, and landscaping/tree coverage implications, as well as operational costs and efficiencies.

Therefore, the currently proposed site layout is considered to be the optimal outcome for the site, providing an appropriate and workable redevelopment scenario which meets the objectives of the project as set out in **Section 1.2** whilst mitigating adverse impacts on the surrounding environment and sensitive receivers. It is commensurate with the Mamre Road Structure Plan and maximise potential for employment generating floorspace, which is the key objective of the WSEA, whilst maintaining a high standard of amenity.

1.7 Secretary's Environmental Assessment Requirements

In accordance with section 4.39 of the EP&A Act, the Secretary of the DPIE issued the requirements for the preparation of the EIS in September 2020 for the project (SSD-9138102), with amended SEARs being issued in December 2020. A copy of the issued amended Secretary's Environmental Assessment Requirements (SEARs) is attached at **Appendix C**.

Table 1 below provides a detailed summary response of the individual matters as listed in the SEARs and identifies where each requirement has been addressed in this report and the accompanying technical studies.

Table 1 Secretary's Environmental Assessment Requirements

Requirement	Relevant report section	Relevant appendix
General requirements		
The Environmental Impact Statement (EIS) for the development must meet the form and content requirements in clauses 6 and 7 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000. In addition, the EIS must include: • a detailed description of the development, including: - the need for the development - justification for the development - likely staging of the development - likely interactions between the development and existing, approved and proposed operations in the vicinity of the site - plans of any proposed building works. • consideration of all relevant environmental planning instruments, including identification and justification of any inconsistencies with these instruments • consideration of issues discussed in Attachment 2 (public authority responses to key issues) • a risk assessment of the potential environmental impacts of the development, identifying the key issues for further assessment • a detailed assessment of the key issues specified below, and any other significant issues identified in this risk assessment, which includes: - a description of the existing environment, using sufficient baseline data - an assessment of the potential impacts of all stages of the development, including any cumulative impacts, taking into consideration relevant guidelines, policies, plans and statutes - a description of the measures that would be implemented to avoid, minimise, mitigate and if necessary, offset the potential impacts of the development, including proposals for adaptive management and/or contingency plans to manage significant risks to the environment • a consolidated summary of all the proposed environmental management and monitoring measures, highlighting commitments included in the EIS.	**Environmental Impact Statement** – throughout report.	
The EIS must also be accompanied by a report from a qualified quantity surveyor providing:	**Appendix G**	

Requirement	Relevant report section	Relevant appendix
• a detailed calculation of the capital investment value (CIV) of the development as defined in clause 3 of the Environmental Planning and Assessment Regulation 2000, including details of all components of the CIV • an estimate of the jobs that will be created by the development during the construction and operational phases of the development. • certification the information provided is accurate at the date of preparation.	**Section 5.14**	**Appendix Q**
Key issues		
Suitability of the Site – including: • detailed justification for the proposal and the suitability of the site under the State Environmental Planning Policy (Western Sydney Employment Area) 2009 (WSEA SEPP); • a detailed description of the history of the site, including the relationship between the proposed development, other proposed developments and all development consents and approved plans previously or currently applicable to the site; and • an analysis of site constraints.	**Section 5.2**	
Statutory and Strategic Context – including: • detailed justification that the proposed land use is permissible with consent; • details of any proposed consolidation or subdivision of land; and • demonstration that the proposal is consistent with all relevant planning strategies, environmental planning instruments, proposed environmental planning instruments, adopted precinct plans, draft district plan(s) and adopted management plans, and justification for any inconsistencies. This includes, but not limited to: - State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP) - State Environmental Planning Policy (Infrastructure) 2007 (ISEPP) - State Environmental Planning Policy (Western Sydney Employment Area) 2009 (WSEA SEPP) - State Environmental Planning Policy (Western Sydney Aerotropolis) 2020 (WSA SEPP) - State Environmental Planning Policy No 33 – Hazardous and Offensive Development (SEPP 33) - State Environmental Planning Policy No 55 – Remediation of Land (SEPP 55) - State Environmental Planning Policy No 64 – Advertising and Signage (SEPP 64) - Penrith Local Environmental Plan 2010 - Greater Sydney Region Plan – A Metropolis of Three Cities - Western City District Plan - Future Transport 2056 and supporting plans - Mamre Road Precinct Structure Plan (DPIE, 2020) and the Local Road Network Structure Plan - Western Sydney Aerotropolis Plan (DPIE, 2020) - Draft Mamre Road Precinct Development Control Plan	**Section 5.1**	
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 justification for the approach; • a report on the results of the implementation of the strategy including issues raised by the community and surrounding landowners and occupiers;	**Section 4**	**Appendix H**

Requirement	Relevant report section	Relevant appendix
• details of how issues raised during community and stakeholder consultation have been addressed and whether they have resulted in changes to the development; and • details of the proposed approach to future community and stakeholder engagement based on the results of consultation.		
Infrastructure Requirements – including: • a detailed written and/or graphical description of infrastructure required on the site, including any upgrades required; • identification of any infrastructure upgrades required off-site to facilitate the development and describe any arrangements to ensure that the upgrades will be implemented in a timely and orderly manner and maintained; • an infrastructure delivery and staging plan, including a description of how infrastructure on- and off-site will be coordinated and funded to ensure it is in place prior to the commencement of construction; and • an assessment of the development's impacts on existing utilities and services and service providers' assets surrounding the site.	**Section 5.5**	**Appendix I**
Urban Design and Visual Impact – including: • a detailed design and options analysis of the development including diagrams, illustrations and drawings with reference to the built 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 with consideration of Clause 31 of SEPP WSEA;	**Section 3.1**	**Appendix B**
• a visual impact assessment (including photomontage and perspectives) of the development layout and design, including staging, site coverage, setbacks, open space, landscaping, height, bulk, scale, colour, building materials and finishes, façade design, retaining walls, signage and lighting, particularly in terms of potential impacts on: - nearby public and private receivers - significant vantage points in the broader public domain - Aldington Road - Mamre Road • consideration of the layout and design of the development having regard to the surrounding vehicular, pedestrian and cycling networks; and	**Section 5.6**	**Appendix J**
• detailed landscaping plans.	**Section 3.7**	**Appendix F**

Requirement	Relevant report section	Relevant appendix
Traffic and Transport – including: • details of all traffic types and volumes likely to be generated during construction and operation, including a description of haul routes. Traffic flows are to be shown diagrammatically to a level of detail sufficient for easy interpretation; • an assessment of the predicted impacts of this traffic on road safety and the capacity of the road network, including consideration of cumulative traffic impacts at key intersections using SIDRA or similar traffic model. This is to include the identification and consideration of approved and proposed developments/planning proposals/road upgrades in the vicinity. The assessment needs to consider the impact on Aldington Road for the duration of the works because traffic growth in this area is expected to increase more quickly than standard growth rates; • detailing how the proposed development connects to adjoining sites to facilitate their future development for their intended purposes; • plans demonstrating how all vehicles likely to be generated during construction and operation and awaiting loading, unloading or servicing can be accommodated on the site to avoid queuing in the street network; • detailed plans of the site access and proposed layout of the internal road and pedestrian network and parking on site in accordance with the relevant Australian Standards and Council's DCP; • swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site; • details of road upgrades, infrastructure works, or new roads or access points required for the development; • details of travel demand management measures to minimise the impact on general traffic and bus operations, including details of a location-specific sustainable travel plan (Green Travel Plan and specific Workplace Travel Plan) and the provision of facilities to increase the non-car mode share for travel to and from the site; • details of the adequacy of existing public transport or any future public transport infrastructure within the vicinity of the site, pedestrian and bicycle networks and associated infrastructure to meet the likely future demand for the proposed development; and • measures to integrate the development with the existing/future public transport network.	**Section 5.7** **Section 5.8**	**Appendix K** **Appendix I**
Soil and Water – including: • A topographic assessment, including a cut and fill plan, and justification demonstrating the proposed earthworks are responsive and contextually appropriate; • an assessment of the development's potential impacts on soil and water resources, topography, hydrology, groundwater, groundwater dependent ecosystem(s), drainage lines, watercourses and riparian lands on or nearby to the site, including mapping and descriptions of existing background conditions and cumulative impacts and measures proposed to reduce and mitigate impacts; • consideration of the NSW Aquifer Interference Policy (2012) and the Guidelines for Controlled Activities on Waterfront Land (2018); • a detailed site water balance including identification of water requirements for the life of the development, measures that would be implemented to ensure an adequate and secure water supply is available for the development and a detailed description of the measures to minimise water consumption at the site; • demonstration satisfactory arrangements for drinking water, wastewater and if required recycled water services have been made; • characterisation of water quality at the point of discharge to surface and/or groundwater against the relevant water quality criteria (including proposed mitigation measures to manage any impacts to receiving waters and monitoring activities and methodologies);	**Section 5.9**	**Appendix I**

Requirement	Relevant report section	Relevant appendix
• a site-specific integrated water management strategy with details of stormwater/wastewater management system including how it will be designed, operated and maintained, including the capacity of on-site detention system(s), on-site sewage management and measures to treat, reuse (including indicative quantities) or dispose of water; • description of the measures to minimise water use; • description of the proposed erosion and sediment controls during construction; and • consideration of salinity and acid sulphate soil impacts.		
Noise and Vibration – including: • a quantitative noise and vibration impact assessment for construction and operation of the development, including traffic noise, undertaken by a suitably qualified person in accordance with the relevant Environment Protection Authority guidelines and including an assessment of nearby sensitive receivers; • cumulative impacts of other existing and proposed developments; and • details of the proposed noise mitigation, management and monitoring measures.	**Section 5.10**	**Appendix L**
Hazard and Risk – including: • a preliminary risk screening completed in accordance with SEPP 33 and Offensive Development and Applying SEPP 33 (DoP, 2011) with a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the development; and • should preliminary screening indicate that the development 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).	**Section 5.11**	**Appendix M**
Biodiversity – including: • an assessment of the biodiversity impacts in accordance with the Biodiversity Assessment Method and documented in a Biodiversity Development Assessment Report (BDAR); and • an assessment of the development's impacts on the riparian corridor and wetland onsite, including detailed interface management measures.	**Section 5.12**	**Appendix N**
Heritage – including: • an assessment of non-Aboriginal cultural heritage items and values of the site and surrounding area;	**Section 5.13**	**Appendix O**
• identifying and describing the Aboriginal cultural heritage values that exist across the development and document in an Aboriginal Cultural Heritage Assessment Report (ACHAR); • consultation with Aboriginal parties including local Aboriginal Council must be undertaken and documented in the ACHAR; and • a description of the impacts on Aboriginal cultural heritage values and associated mitigation measures must be included in the ACHAR.	**Section 5.14**	**Appendix P**
Social Impact – including the preparation of a Social Impact Assessment (SIA), which: • identifies and analyses the potential social impacts of the development from the point of view of the affected communities and other relevant stakeholders (i.e., how they experience the development); • considers how potential environmental changes in the locality may affect people's way of life including community, access to and use of infrastructure, services and utilities, culture, health and wellbeing, surroundings, personal and property rights, decision-making systems, and fears and aspirations, as relevant and considering how different groups may be disproportionately affected; • assesses the significance of positive, negative, and cumulative social impacts considering likelihood, extent, duration, severity/scale, sensitivity/importance, and level of concern/interest(s);	**Section 5.15**	**Appendix Q**

Requirement	Relevant report section	Relevant appendix
• includes mitigation measures for likely negative social impacts and any proposed enhancement measures; and • details of how social impacts will be adaptively monitored and managed over time.		
Contamination – including an assessment of the site suitability for the proposed use(s) in accordance with SEPP 55.	**Section 5.16**	**Appendix R** **Appendix S** **Appendix T**
Bushfire - including a bushfire assessment against the requirements of Planning for Bush Fire Protection (NSW Rural Fire Service, 2019).	**Section 5.17**	**Appendix U**
Air Quality – including an assessment of air quality impact at sensitive receivers during construction and operation in accordance with NSW Environment Protection Authority guidelines and details of mitigation, management and monitoring measures.	**Section 5.18**	**Appendix V**
Waste Management – including details of the quantities and classification of waste streams generated during construction and operation and proposed storage, handling and disposal requirements.	**Section 5.19**	**Appendix W**
Greenhouse Gas and Energy Efficiency – including an assessment of the energy uses onsite and all reasonable and feasible measures that would be implemented onsite to minimise the development's greenhouse gas emissions.	**Section 5.20**	**Appendix X**
Ecologically Sustainable Development – including a description of how the development will incorporate the principles of ecologically sustainable development in the design, construction and operation of the development.		
Airport Safeguarding – including a risk assessment of the proposed development on Western Sydney Airport operations and addressing related matters in the Western Sydney Aerotropolis Plan and the State Environmental Planning Policy (Western Sydney Aerotropolis) 2020.	**Section 5.3**	
Planning Agreement / Development Contributions – including consideration of any applicable State and local development contributions and/or details of any Voluntary Planning Agreement and demonstration that satisfactory arrangements have been made or will be made to provide or contribute to the provision of the necessary local and regional infrastructure required by WSEA SEPP or any other policy or plan to support the development.	**Section 5.22**	
Plans and Documents		
The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the Regulation. Provide these as part of the EIS rather than as separate documents. In addition, the EIS must include high quality files of maps and figures of the subject site and proposal.	**Section 3**	**Appendix A**
Consultation		
During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners. In particular you must consult with: • Penrith City Council · Department of Planning, Industry and Environment, specifically: - Central (Western) Team, Central River City & West Parkland City, Place Design and Public Spaces Group - Cumberland Plain Conservation Plan Team, Green and Resilient Places - Climate Change and Sustainability Division, Environment, Energy and Science Group - Water Group (including the Natural Resources Access Regulator) • Endeavour Energy • Fire and Rescue NSW	**Section 4**	**Appendix H**

Requirement	Relevant report section	Relevant appendix
• NSW Rural Fire Service • Sydney Water • TfNSW (including Roads and Maritime Services) • Western Parkland City Authority • Western Sydney Planning Partnership • Western Sydney Airport • local community and other stakeholders. 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.		
Further consultation after 2 years		
If you do not lodge a Development Application and EIS for the development within 2 years of the issue date of these SEARs, you must consult further with the Planning Secretary in relation to the preparation of the EIS.	Noted.	
References		
The assessment of the key issues listed above must take into account relevant guidelines, policies, and plans as identified. While not exhaustive, the following attachment contains a list of some of the guidelines, policies, and plans that may be relevant to the environmental assessment of this proposal.	Noted.	

2.0 Site analysis

2.1 Location and context

The site is located within the suburb of Kemps Creek, within the Penrith Local Government Area (LGA) as shown in **Figure 4** below. It forms part of the Mamre Road Precinct (**Figure 3**), which sits within both the Western Sydney Employment Area and Western Sydney Aerotropolis (Figure 6**Figure 5**).

Surrounding land uses currently comprise a predominantly rural typology, with a variety of rural dwellings, rural land, farm dams and scattered vegetation. Beyond this, the Oakdale South industrial estate is located approximately 2.2km to the northeast of the site, and the established large lot residential housing community of Mount Vernon is located to the south east.

The site is located approximately 60km west of the Sydney CBD and 20km south east of the Penrith CBD. It is partially located along Aldington Road, and the Abbotts Road cul-de-sac. Both Aldington and Abbotts Road connects to Mamre Road, which is a major corridor providing vehicular access to the M4 and M7 motorways, and The Northern Road corridor (A9). This allows easy and efficient freight access to Greater Sydney.

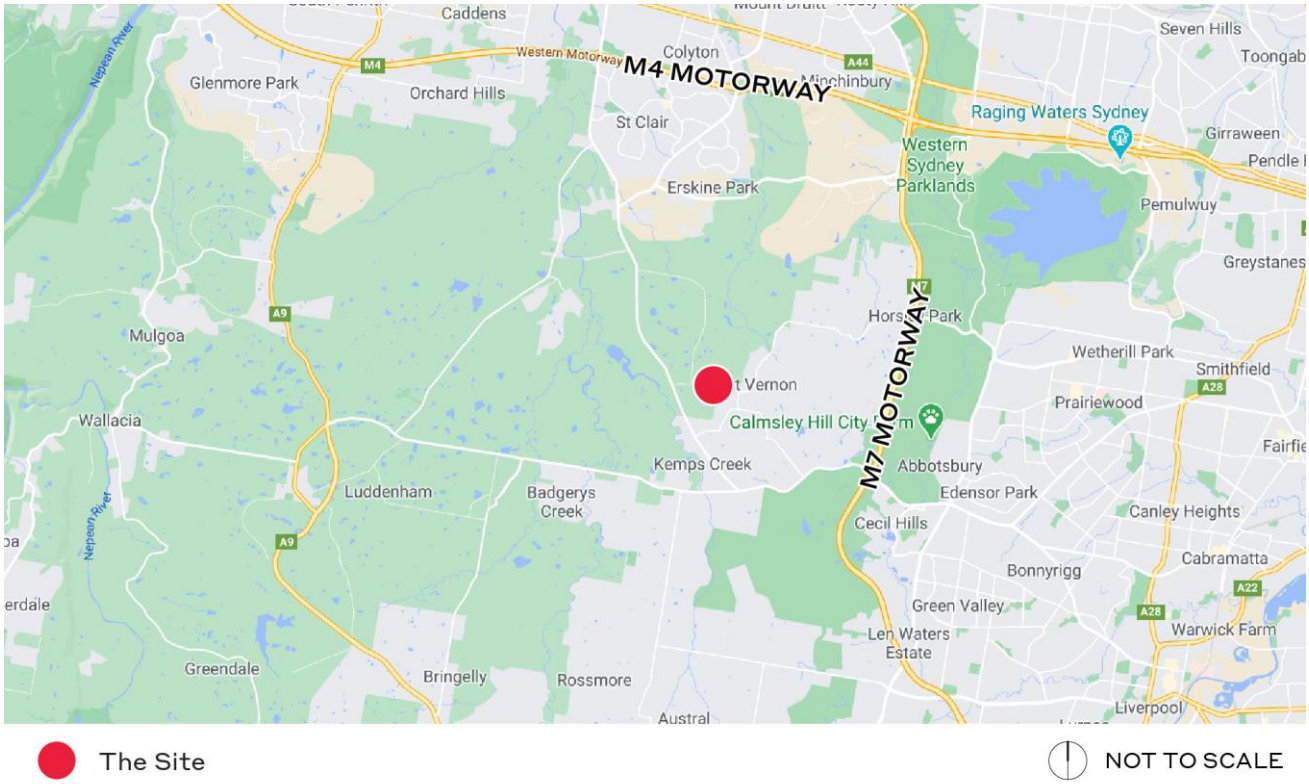

Figure 4 Site context

Source: Google Maps, edits by Ethos Urban

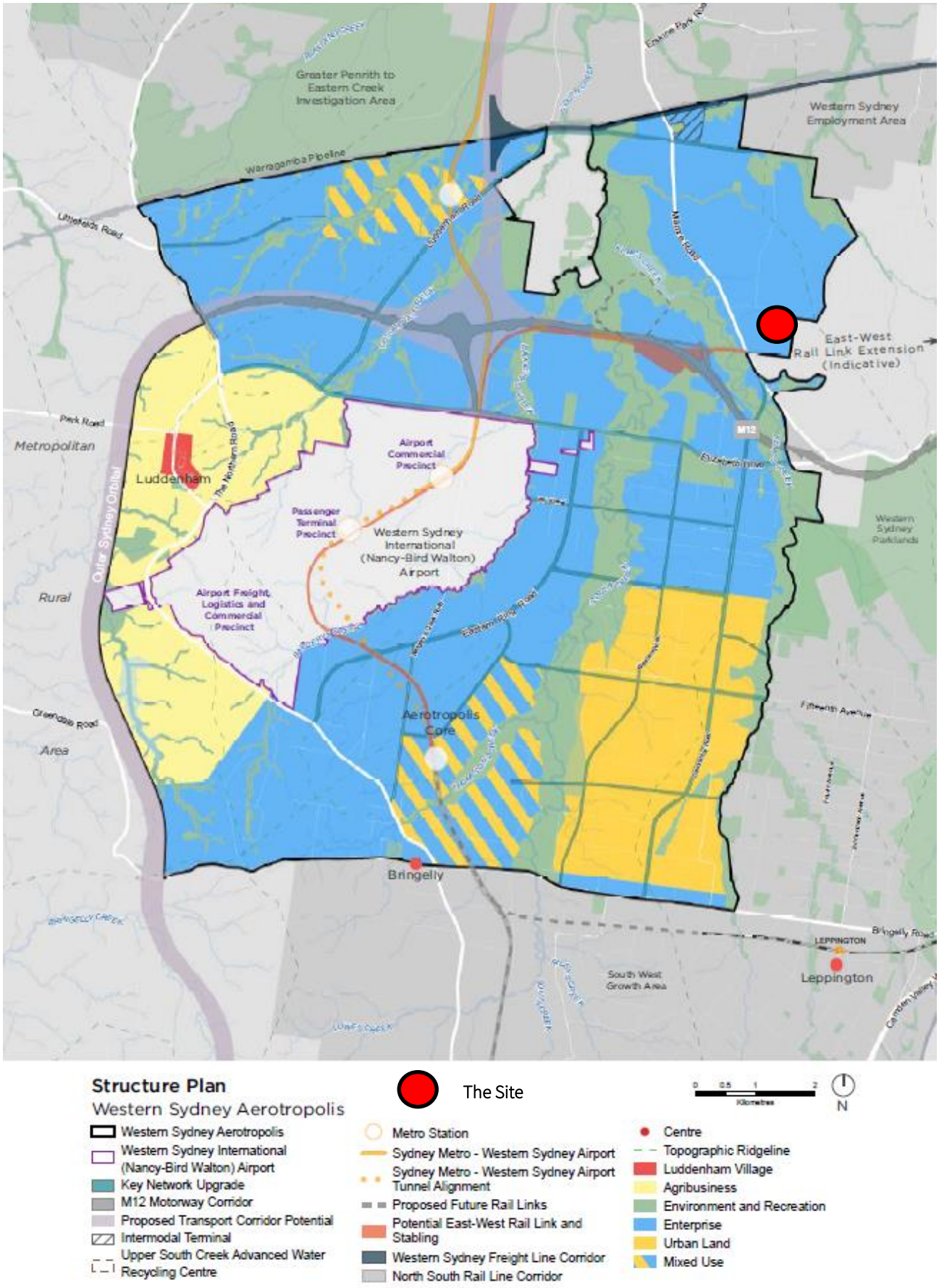

Figure 5 Location of the site within the Sydney Western Aerotropolis Structure Plan

Source: Western Sydney Aerotropolis Plan 2020, edits by Ethos Urban

2.2 Site description

The site comprises three separate allotments (**Table 2**), identified as 290-308 Aldington Road, 59-62 Abbotts Road, and 63 Abbotts Road, as shown in **Figure 6** below. These addresses are legally described as Lots 13, 12 and 11 in DP253503, respectively. The land is approximately 319,800m^2 in area and is irregular in shape.

The site currently comprises undulated rural land, with a combination of residential dwellings, farm sheds, and miscellaneous agricultural greenhouses and structures. It is therefore best described as being rural-residential in nature, with significant areas of land currently remaining unused.

Figure 6 Site aerial

Source: Nearmaps, edits by Ethos Urban

Table 2 Site description

Address	Title	Area (m^2)
290-308 Aldington Road	Lot 13 / DP253503	104,700m^2
59-62 Abbotts Road	Lot 12 / DP253503	104,900m^2
63 Abbotts Road	Lot 11 / DP253503	110,200m^2

2.3 Current site conditions

Photos of the site showing the current site conditions is provided in **Figure 7** through **Figure 10** below. A Site Survey has been prepared by Land Partners and is attached to this report at **Appendix D**.

Figure 7 Looking SW towards 63 Abbotts Road From the end of Abbotts Road

Source: Ethos Urban

Figure 8 Looking south to 63 Abbotts Road from the end of Abbotts Road

Source: Ethos Urban

Figure 9 Looking east to 59-62 Abbotts Road from the end of Abbotts Road

Source: Ethos Urban

Figure 10 Looking NE to 290-308 Aldington Road from the 59-62 Abbotts Road driveway

Source: Ethos Urban

2.3.1 Topography

The site comprises a predominantly undulating topography, with high points running along the eastern boundary (RL 92.50) with crossfalls towards the dams and the western boundary at the intersection of Aldington and Abbotts Road, of 42 metres. This intersection comprises the lowest point on the site (RL 50.77). An overview of the site's topography is shown in **Figure 11** below.

Figure 11 Site topography

Source: Nettleton Tribe

2.3.2 Vegetation

The current site is generally absent of significant vegetation. Small pockets of mapped vegetation exist, predominantly towards the north-western extremities of the site. A total of 5 small man-made farm dams are also located within the site, most of which have limited riparian or fringing vegetation surrounding them. The location of existing site vegetation and farm dams are provided in **Figure 12** below.

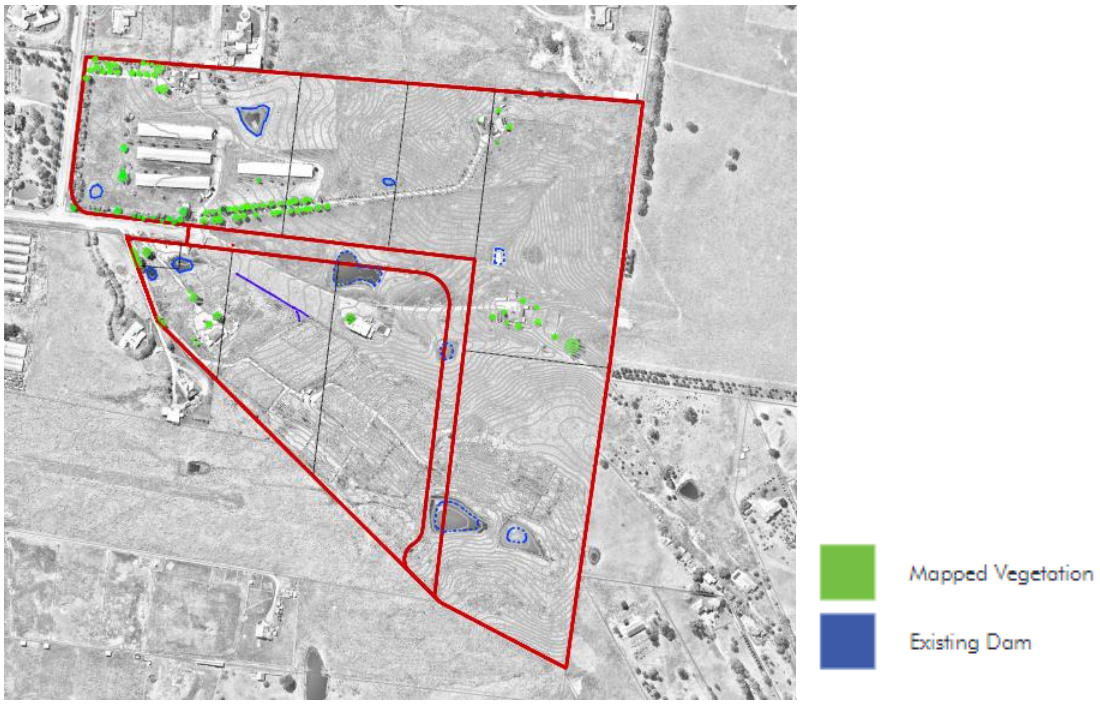

Figure 12 Existing site vegetation and farm dams

Source: Nettleton Tribe

2.3.3 Heritage

The site does not contain any heritage items under any environmental planning instrument, and nor is it located within a Heritage Conservation Area under Schedule 5 of the WSEA SEPP.

A Heritage item is located partially adjacent to the site towards the north, at 282 Aldington Road (Lot 142 in DP1033686). This item is listed as 'I4 – Brick farmhouse' under Schedule 5 of WSEA SEPP and is of local significance.

Furthermore, another heritage item is also located in close proximity to the site towards its northwest, at 269 Aldington Road. This item is listed as 'I3 – Gateposts to Colesbrook' under Schedule 5 of the WSEA SEPP and is also of local significance.

A third heritage item is located further afield, at 919-929 Mamre Road. This item is listed as 'I2 – Bayley Park' and is of local significance.

A map of these Heritage items as they relate to the site is provided in **Figure 13** below.

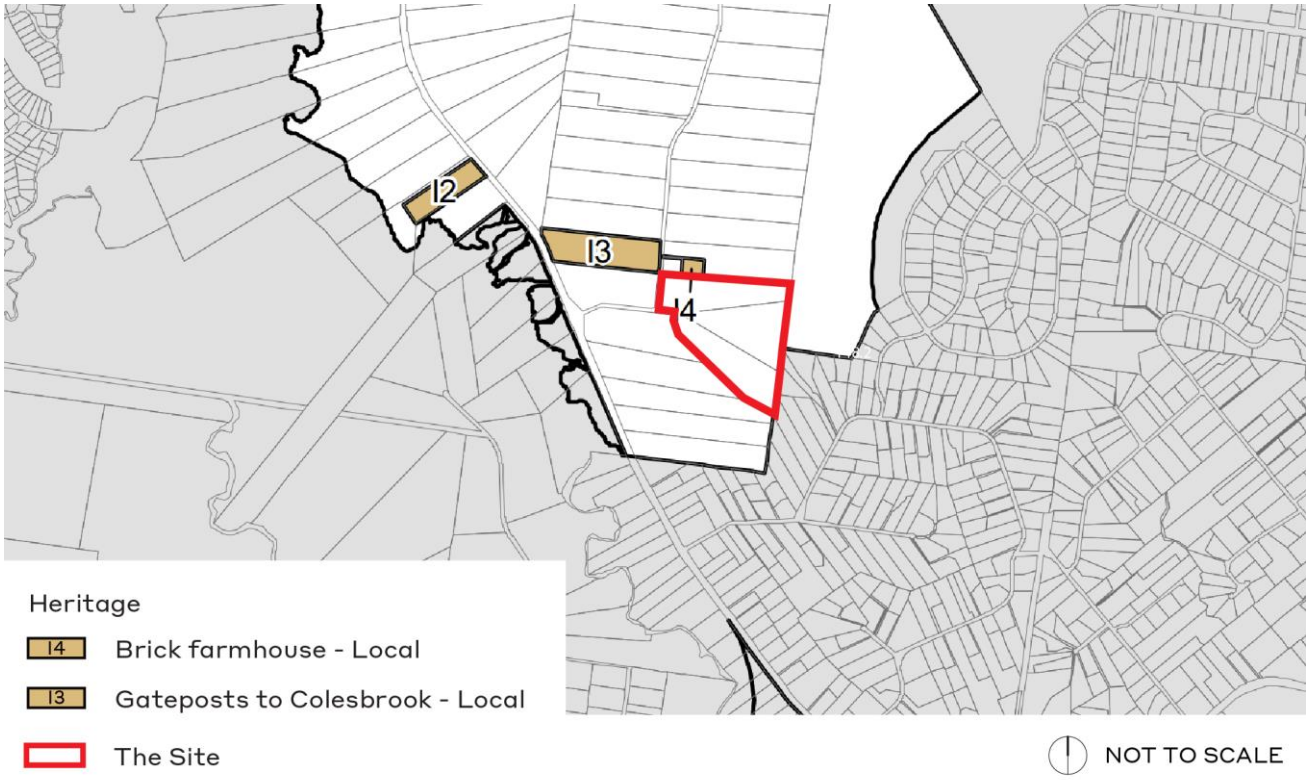

Figure 13 Heritage items in close proximity to the site

Source: WSEA SEPP, edits by Ethos Urban

2.3.4 Flooding

The site is not identified as being flood prone land under the Penrith Overland Flow Study. The site is not affected by 1-in-100 year ARI flood events and the Probable Maximum Flood from South Creek as defined within the relevant supporting flood studies.

2.3.5 Bushfire

The entirety of the site is identified as 'Vegetation Category 2' bushfire prone land under the Penrith Bush Fire Prone Land Map. Vegetation Category 2 is considered to be at lower risk of bushfires than Vegetation Category 1 lands, but subject to higher risk compared to unmarked areas.

2.3.6 Road network

As shown above, the site is irregular in shape and is bounded generally by Aldington Road to the west at the north end of the site, with approximately 185m of direct frontage, and adjacent rural lots to the north, east and south. The Abbotts Road cul-de-sac protrudes into the site and provides vehicular access to all the current component allotments. Aldington Road and Abbotts Road are sealed rural roads with central line markings and two lanes wide (one each in each direction).

Aldington Road connects to Mamre Road, which provides a north-south link to the M4 and M7. Being located in the Western Sydney Employment Areas, the site will also benefit from the M9 (Outer Sydney Orbital) and M12 motorways when they open.

2.3.7 Surrounding development

As aforementioned, the site's current immediate surrounding context is that of other rural-residential allotments (**Figure 14** and **Figure 15**), as well as the following development within the surrounding periphery of the site. It is noted that as the surrounding area has been recently rezoned to industrial land, the future context of the site's surroundings will also be industrial in nature.

- Large lot residential development at Mount Vernon is located adjacent to the site approximately 300-400m to the south-east;
- The Twin Creeks large lot residential community is located 4km to the northwest of the site;
- The Erskine Park industrial area is located 5km to the north of the site; and
- The Horsley Park industrial area is located 7km to the northeast of the site; and
- The Badgerys Creek Airport site/construction area is located 6km to the southwest of the site.

Figure 14 Looking SE towards 1016-1028 Mamre Road (immediate south-west of the site) from Abbotts Road

Source: Ethos Urban

Figure 15 Looking west to 1 Abbotts Road (immediate north-west of the site) from Aldington Road

Source: Ethos Urban

3.0 Description of the proposed development

This chapter of the EIS provides a detailed description of the proposed development. This SSDA seeks approval for the following development:

- Site preparatory works, including:
  - Demolition and clearing of all existing built form structures and vegetation;
  - Bulk earthworks including 'cut and fill' to create flat development platforms for the proposed buildings, and topsoiling, grassing and site stabilisation works;
- Subdivision of the site into 7 individual lots;
- Construction of a new industrial estate at the site comprising 7 allotments and a total gross leasable area of 158,185m^2, including:
  - 7 new industrial warehousing buildings with ancillary offices across 6 allotments, comprising:
    - 151,935m^2 of warehousing floorspace; and
    - 6,250m^2 of ancillary office floorspace;
  - 1 new on-site retail café building comprising 200m^2 of floorspace;
- Construction of a new internal road layout and parking for 777 vehicles;
- Associated site servicing works and ancillary facilities, including OSD detention basin;
- Associated site landscaping; and
- Works-in-kind (WIK) arrangements through a Voluntary Planning Agreement (VPA) for external road upgrades including to Aldington and Abbotts Road, and a new signalised intersection at Mamre and Abbotts Road.

The proposal will be undertaken in accordance with the Architectural Plans prepared by Nettleton Tribe at **Appendix A**, informed by the Urban Design Report prepared by Nettleton Tribe at **Appendix B**. An excerpt from the plans is shown in **Figure 16** below.

3.1 Development principles

The overarching design and built form of the proposed development is guided by the following comprehensive design and development principles:

- Provide a well-connected street layout consistent with the intention for the broader Mamre Road Precinct which facilitates a safe vehicular and pedestrian environment;
- Deliver a landscaping outcome which integrates with the appearance of the large industrial estate to soften the interface towards the eastern boundary of the site (identified as 'transition to rural');
- Establish an appropriately high level of amenity at the site for the site's industrial uses;
- Ensure the incorporation of appropriate office uses facing site frontages, access points and surrounding areas, to provide a welcoming and highly amenable environment;
- Create opportunities for flexibility and efficiencies for future operation and function in a key strategic site in the Mamre Road Precinct and WSEA;
- Utilise high quality materials, finishes and colours complementing the site and its location, ensuring that signage and wayfinding referencing the proposed industrial estate reflects the chosen landscaping scheme.

The proposed development provides a contextually and economically appropriate design whilst responding to topography constraints to limit site earthworks requirements and retaining walls fronting public road reserves. The proposed development provides for 7 warehouses as well as a cafe / retail area at the entrance to site.

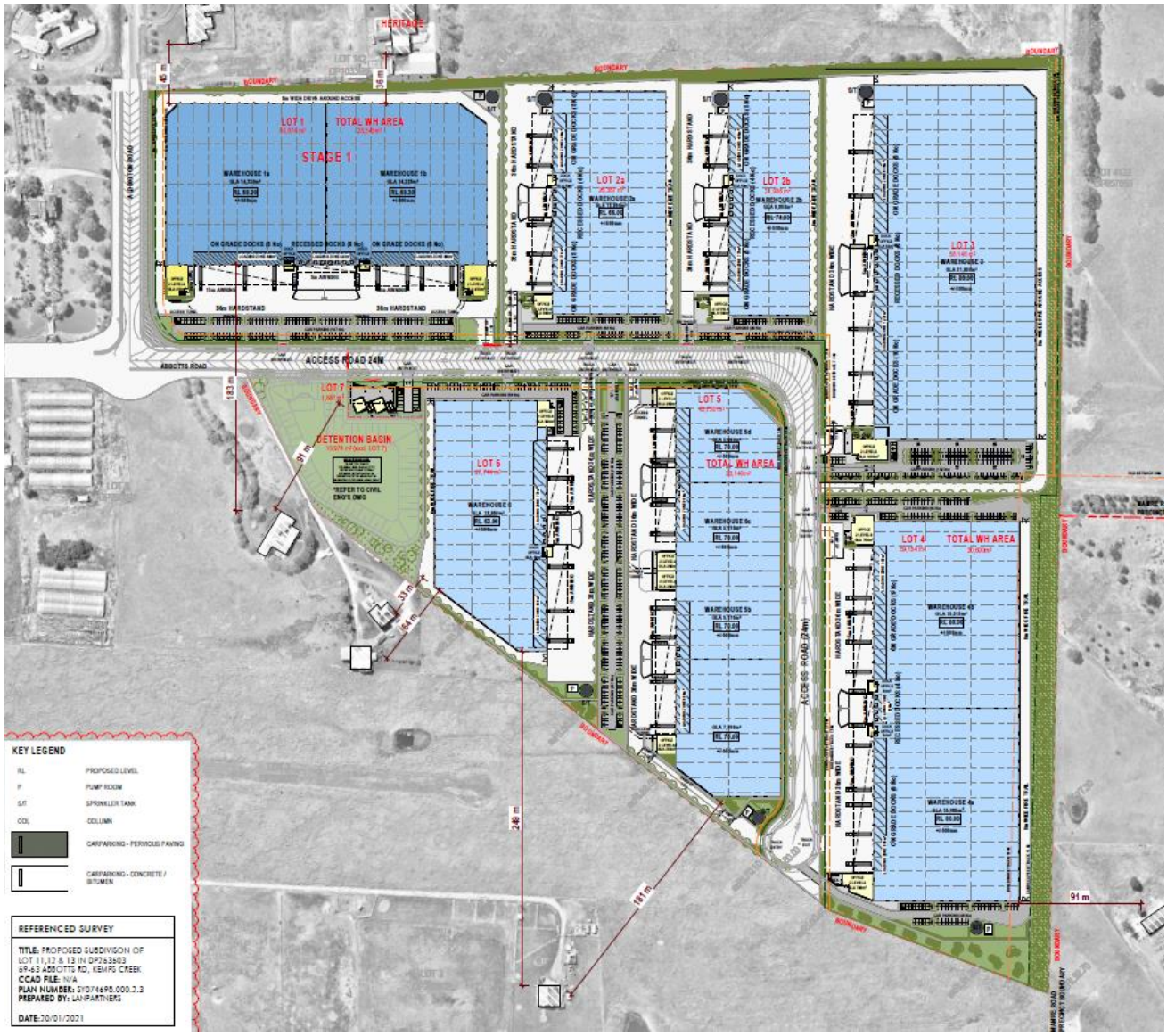

Figure 16 Proposed site masterplan

Source: Nettleton Tribe

3.2 Demolition and preparatory works

To enable the redevelopment of the site, it is envisioned that all existing structures will be demolished. A detailed Construction Management Plan (CMP) will be prepared by the appointed contractor prior to demolition works commencing and submitted to the relevant consent authority. The CMP will outline the extent of demolition works and the process and techniques to ensure the appropriate disposal of materials.

Bulk earthworks will then be required to grade the site and provide flat building pads suitable for development. The earthworks proposed will include cut and fill given the undulating topography of the site. Retaining walls will also be constructed across the site where batter slopes cannot accommodate level changes and where the building pad levels will be cut down from the existing. The retaining walls will likely comprise a mix of boulder walls and face block or keystone products across the site.

The retaining walls will be designed and constructed using standard industry practices and on a staged basis as required to suit the proposed earthworks. All retaining walls will have pedestrian and vehicular safety barriers (where required) in accordance with the Austroads Guidelines.

3.3 Site subdivision

To enable the redevelopment of the site, it is then proposed that the site be subdivided into seven (7) separate allotments. Lots 1 – 6 will comprise the new industrial warehousing buildings and their ancillary offices (with Lot 2 to contain two separate warehouse buildings – 2a and 2b) whilst Lot 7 will comprise the new café retail building. Lot 6 will also contain an easement that accommodates the proposed OSD detention basin.

The proposed subdivision works will be undertaken in accordance with the Plan of Subdivision prepared by Land Partners Surveyors at **Appendix E**, an excerpt of which is shown in **Figure 17** below.

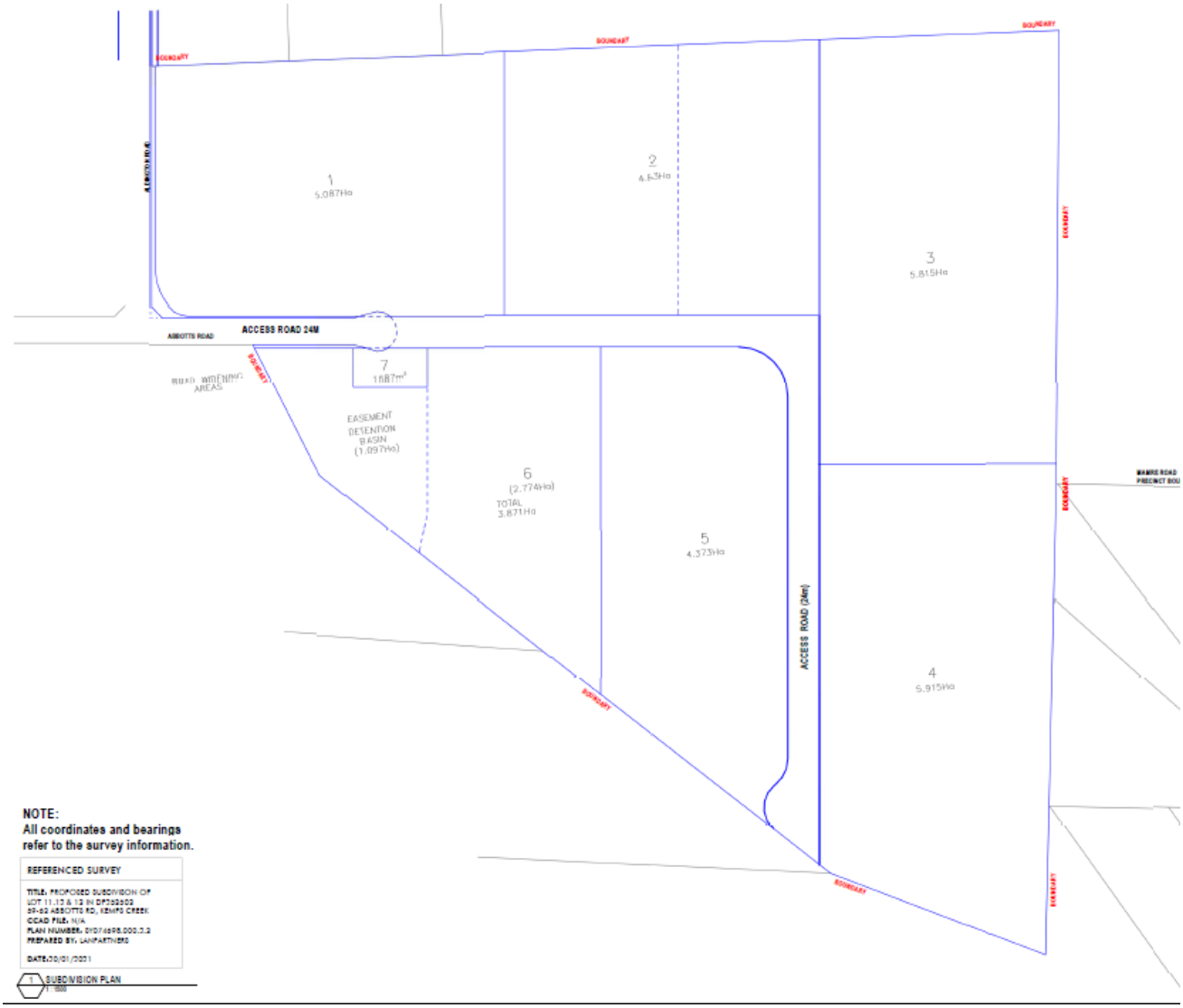

Figure 17 Proposed plan of subdivision

Source: Land Partners Surveyors

3.4 Construction staging

Following site preparation works, it is envisioned that Westlink is to be constructed in multiple stages. This will enable the orderly development of the site and minimise construction impacts on surrounding sensitive receivers.

Stage 1 construction works will involve the construction of the internal road network, warehouse 1 at the north western part of the site within the proposed Lot 1 including its associated site landscaping and vehicular parking, and the OSD retention basin within the Lot 6 easement. Warehouse 1 will comprise two adjacent components, Warehouse 1a and Warehouse 1b.

The remaining aspects of the proposed development, including warehouses 2 – 6 in Lots 2 – 6 and the retail café building on Lot 7, will be constructed in individual stages across the next few years as the uptake of industrial floor space requires.

Construction staging will occur in accordance with the Staging Plan included in the Architectural Plans at **Appendix A**, which is shown in **Figure 18** below.

Figure 18 Proposed construction staging plan, with Stage 1 works shown

Source: Nettleton Tribe

3.5 Numerical breakdown

A numerical overview of the Westlink development by lot is provided in **Table 3** below:

Table 3 Proposed development numerical breakdown

Lot	Warehouse GLA (m^2)	Office GLA (m^2, including dock offices)	Total building GLA (m^2)	Parking spaces provided
Stage 1				
Lot 1	28,545	1,050	29,595	147
Stage 2 through 7 (timing as required)				
Lot 2a	13,950	550	14,500	66
Lot 2b	9,950	550	10,500	49
Lot 3	31,600	1,050	32,650	132
Lot 4	30,600	1,500	32,100	132
Lot 5	23,140	1,000	24,140	181
Lot 6	13,950	550	14,500	58
Lot 7	200	café area	200	12
Total	**151,935**	**6,250**	**158,185**	**777**

3.6 Built form

Each of the warehouse buildings and surrounding area of Westlink will include:

- A single storey warehouse building with either two (for Lots 2 – 6) or three storey (Lot 1) ancillary office floor space components;
- A hard stand area for service vehicles and truck delivery along the front of each building footprint;
- Landscaping works along each setback and adjacent to the ancillary office space components; and
- At-grade dedicated vehicle parking spaces for each warehouse building footprint.

The building envelopes have been designed to be comparable in scale across the site. As detailed in the Architectural Plans at **Appendix A**, each envelope in the proposed masterplan adopts a similar maximum building height ranging from RL 59 (for Warehouse 1) to RL 80 (for Warehouses 3 and 4) which is mediated by the topography of the site. An excerpt of the Site Sections in the Architectural Plans visualising this is provided in **Figure 19** below.

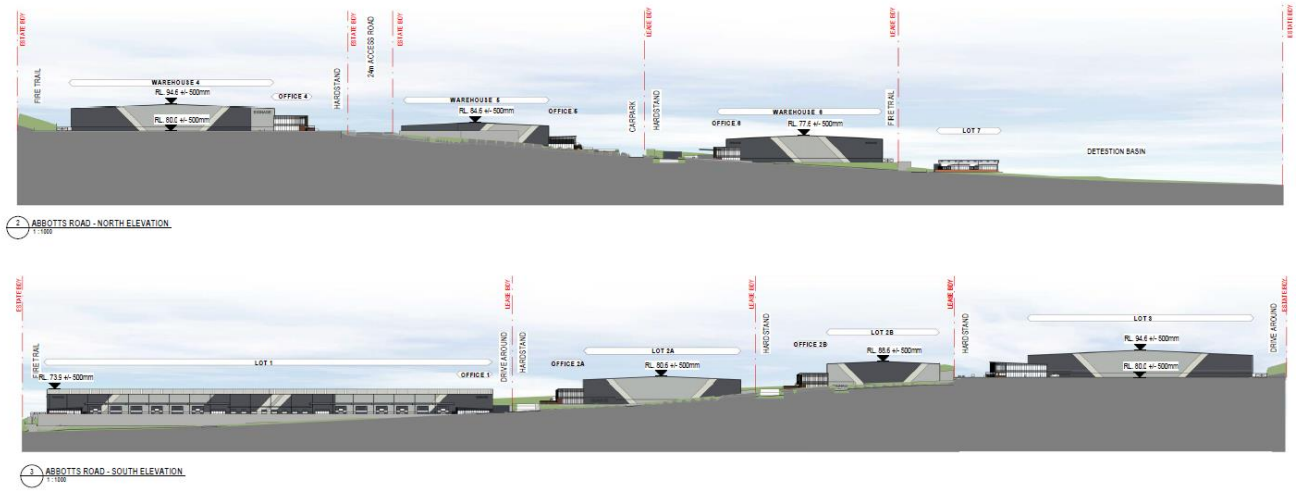

Figure 19 Example site sections

Source: Nettleton Tribe

3.7 Landscaping

As discussed in the Urban Design Report prepared by Nettleton Tribe at **Appendix B**, the proposed development utilises landscaping and urban design features to complement biodiversity values. Landscaping for Westlink responds to the key interfaces of the estate with the public domain, adjoining properties and environmentally sensitive lands such as increased setbacks to the Rural Residential lands. The landscape strategy for Westlink aims to reflect a consistent image and maintenance regime across the entire estate and respond to its unique site characteristics.

Proposed site landscaping works will be undertaken in accordance with the Landscape Plans prepared by Site Image Landscape Architects at **Appendix F**, an excerpt of which is provided in **Figure 20** below.

Figure 20 Proposed site landscaping masterplan

Source: Site Image Landscape Architects

3.8 Signage

The proposed development also seeks consent for freestanding pylon signs for the purposes of identification of the proposed industrial estate, directional signage, and tenant identification, as well as tenancy facade signs for the purposes of tenant identification. Specifically, the following signage is proposed at the site:

- 1x 12m estate identification pylon sign ('Signage Type 1');
- 15x directional wayfinding pylon signs ('Signage Type 2');
- 7x tenancy identification pylon signs ('Signage Type 3');
- 2x alternate tenancy identification pylon signs '(Signage Type 4'); and
- 20x tenancy façade signs ('Signage Type 5').

The location of the proposed signs is shown in the Estate Signage Plan within the Architectural Plans at **Appendix A**. The detail of the proposed signage is shown in the Signage Details, Colours and Material Schedule within the Architectural Plans at **Appendix A**, an excerpt of which is provided in **Figure 21** below.

The proposed signs meet the relevant requirements of the *State Environmental Planning Policy No. 64 – Advertising and Signage* (SEPP 64), as evidenced in **Section 5.24** below.

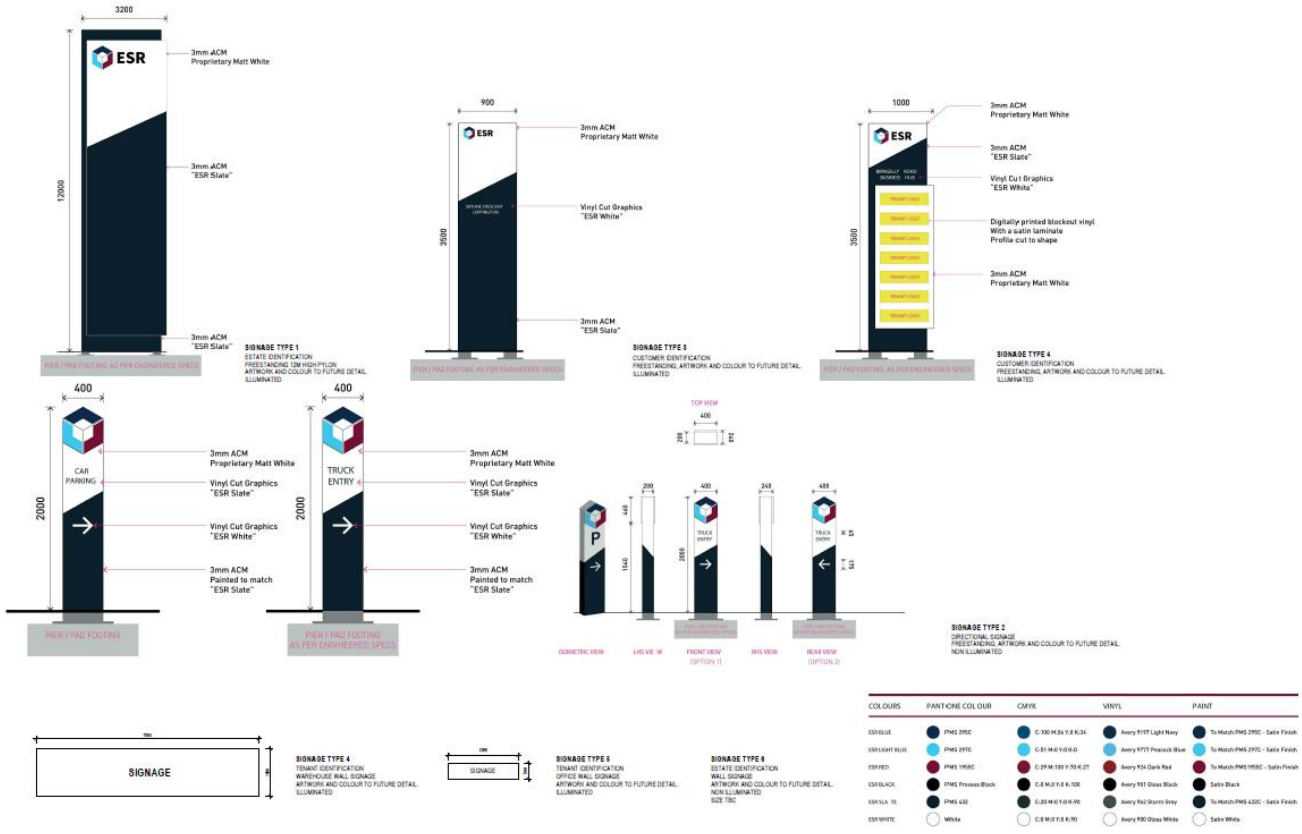

Figure 21 Design of proposed signage at the site

Source: Nettleton Tribe

3.9 Site access and parking

Access to the site is proposed to be via three-way junction at the Abbotts Road and Aldington Road intersection, sized appropriately to cater for B-Doubles.

The internal road network will be designed and constructed in accordance with the Penrith City Council design and construction specifications. Cul-de-sacs will also be designed and constructed in accordance with the Council guidelines requiring a 16.5m radius on the turn heads. The internal access road (extension of Abbotts Road) will accommodate a B-Double truck with a design speed of 60km/h.

The proposed internal road network (extension of Abbotts Road) will be built to the following specifications:

- A 24.0m wide Road Reserve;
- A 15.0m wide carriageway, comprising:
  - 2 x 3.5m wide traffic lanes; and
  - 2 x 4.0m wide parking lanes adjacent kerb;
- Verge 1 at 4.0m wide containing a 1.5m footpath and verge 2 at 5.0m wide containing a 2.5m shared path; and
- Cul-de-sac to be 33m diameter to accommodate a B-Double truck.

A typical section of the proposed internal road is shown in **Figure 22** below.

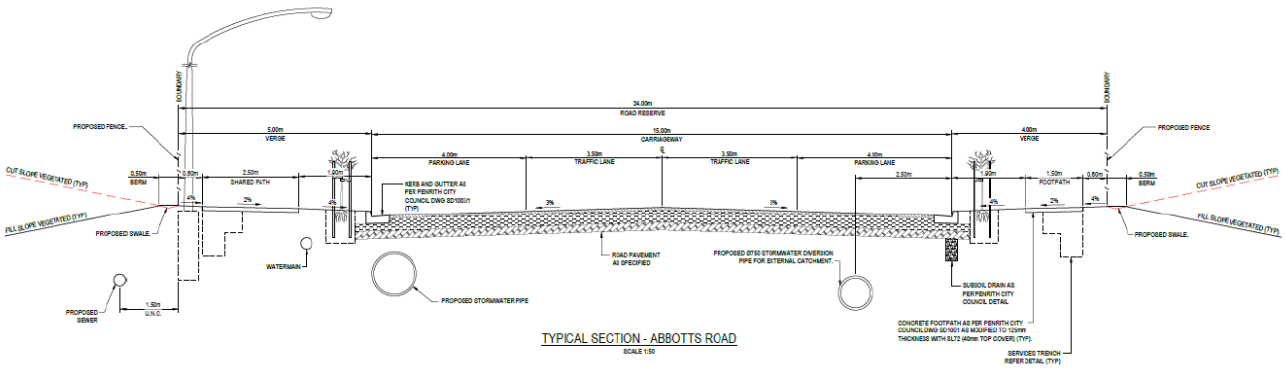

Figure 22 Typical section – Abbotts Road extension (new internal road)

Source: AT&L

A total of 777 vehicular parking spaces will be provided at the site, with the number in each allotment provided in **Table 3** above. The car parking rates at the site meet or exceed RMS requirements (*Guide to Traffic Generating Developments*).

3.10 Voluntary Planning Agreement

The proposed development will provide works-in-kind arrangements by way of a Voluntary Planning Agreement for the upgrade of the Mamre Road / Abbott Road intersection upgrade, which will allow the intersection to accommodate the proposed development, as required under Section 29 of the WSEA SEPP. The design of the intersection will be finalised following the completion of traffic modelling for the Mamre Road precinct. This issue is further discussed in **Section 5.22** below.

4.0 Consultation

In accordance with the SEARs issued for this project, consultation was undertaken with various stakeholders. The outcomes of consultation undertaken is discussed in detail in the Consultation Outcomes Report prepared by Elton Consulting and attached to this report at **Appendix H**, a summary of which is provided in the below sub-sections.

4.1 Letterbox drop

Two letterbox drops to the residential areas surrounding the site was carried out by Elton Consulting, on 30 October and 23 November (**Figure 23**).

Figure 23 Letterbox distribution area – 30 October (left) and 23 November (right)

Source: Elton Consulting

The factsheet delivered on 30 October acted as an introduction to the development, including its approval and construction timeline and an explainer on the DPIE planning process. During the first letterbox drop, the team spoke with four residents about the project and factsheets were distributed to 113 homes. None of the residents spoken to expressed concern about the project as the development is located far enough to have little to no impact upon their daily activities.

The factsheet distributed on 23 November provided similar summary information on the project and included an invite to the Community Information and Feedback Session (CIFS; **Section 4.3**). As this factsheet included the CIFS invite, it was delivered to a larger distribution area of 172 homes.

4.2 Project workshops

On Tuesday 8 December 2020, Elton Consulting facilitated an online workshop with all key stakeholders identified in the SEARs requirements, as well as those known to have an interest or investment Western Sydney development. A total of eight stakeholders opted to attend, from six different agencies and/or government departments:

- Department of Planning, Industry and Environment;
- Greater Sydney Commission;
- Transport for NSW;
- Western Parkland City Authority;
- Endeavour Energy; and
- Penrith City Council.

The workshop involved a short presentation from ESR, followed by an informal Q&A session facilitated by Elton Consulting. An in-person workshop was offered to stakeholders and was scheduled to occur immediately after the online session at ESR's offices, however, all attendees opted for the online session.

4.3 Community information and feedback session

A community information and feedback session was held at Twin Creeks Golf and Country Club on Wednesday 9 December 2020 from 3pm – 7pm (15:00 – 19:00). A total of eight people attended the session, most of whom identified themselves as long-standing residents of the area.

Many questions were in relation to the details of the built site, and its operations once open. These questions were asked in a way to gauge the level of impact once construction is complete. No one was overly concerned by these potential impacts, nor opposed to the overall proposal. Attendees sought information on the different proposed heights of the structures, the types of tenants the site is likely to attract and what utilities would be needed to operate the site.

4.4 Project email and website

A dedicated project email was established and managed by the ESR team during this early engagement phase. To date as of the publishing of the Community Outcomes Report (17 December 2020), no enquiries or complaints have been received via the project email.

An information page was also set up on ESR's company website.

5.0 Environmental assessment

This section of the report assesses and responds to the relevant environmental impacts of the proposed development. This section has been set out to specifically respond to the matters raised for consideration in the SEARs (refer to **Section 1.7**). Mitigation Measures at **Section 7** complement the findings of this section.

5.1 Relevant EPIs, policies, and guidelines

The relevant strategies, Environmental Planning Instruments (EPIs), policies and guidelines as set out in the SEARS are addressed in **Table 4** below, in the order as assigned under the SEARs.

Table 4 Summary of consistency with relevant strategies, EPIs, policies, and guidelines

<table>
<tr><th>Strategy</th><th>Assessment</th></tr>
<tr><td colspan="2">Environmental Planning Instruments</td></tr>
<tr><td>Environmental Planning and Assessment Act 1979 (EP&A Act)</td><td>The proposed development is consistent with the objects of the EP&A Act for the following reasons:
This DA represents a balanced delivery of employment land in consideration of the environmental factors of the subject site, with the purpose of promoting the social and economic welfare of the community and facilitating a better environment;
The proposed development promotes the orderly and economic use and development of land through a balanced outcome that supports the ongoing viability of the Western Sydney Employment Lands, and ensures high density employment uses are retained in appropriate and sensitive locations; and
This DA has been carefully designed with regards to the principles of Ecologically Sustainable Development.</td></tr>
<tr><td>Environmental Planning and Assessment Regulation 2000 (EP&A Regulation)</td><td>The EIS has addressed the specification criteria within clause 6 and clause 7 of Schedule 2 of the EP&A Regulation. Similarly, the EIS has addressed the principles of ecologically sustainable development through the precautionary principle, intergenerational equity, conservation of biological diversity and improved valuation, pricing and incentives mechanisms which assesses the threats of any serious or irreversible environmental damage (see Section 5.20).

As required by clause 7(1)(d)(v) of Schedule 2, the following additional approvals will be required in order to permit the proposed development to occur.

<table>
<tr><th>Act</th><th>Approval Required</th></tr>
<tr><td colspan="2">Legislation that does not apply to State Significant Development</td></tr>
<tr><td>Coastal Protection Act 1979</td><td>N/A</td></tr>
<tr><td>Fisheries Management Act 1994</td><td>N/A</td></tr>
<tr><td>Heritage Act 1977</td><td>N/A</td></tr>
<tr><td>National Parks and Wildlife Act 1974</td><td>N/A</td></tr>
<tr><td>Native Vegetation Act 2003</td><td>N/A</td></tr>
<tr><td>Rural Fires Act 1997</td><td>N/A</td></tr>
<tr><td>Water Management Act 2000</td><td>N/A</td></tr>
<tr><td colspan="2">Legislation that must be applied consistently</td></tr>
<tr><td>Fisheries Management Act 1994</td><td>No</td></tr>
<tr><td>Mine Subsidence Compensation Act 1961</td><td>No</td></tr>
<tr><td>Mining Act 1992</td><td>No</td></tr>
<tr><td>Petroleum (Onshore) Act 1991</td><td>No</td></tr>
<tr><td>Protection of the Environment Operations Act 1997</td><td>No</td></tr>
<tr><td>Roads Act 1993</td><td>Yes</td></tr>
<tr><td>Pipelines Act 1967</td><td>No</td></tr>
</table></td></tr>
<tr><td>State Environmental Planning Policy (State and</td><td>Clause 12 of Schedule 1 of SEPP SRD provides that development for the purposes of warehouses and distribution centres to be SSD if it is development that has a Capital Investment</td></tr>
</table>

Strategy	Assessment
Regional Development) 2011 (SEPP SRD)	Value (CIV) of more than $30 million at one location and related to the same operation (noting the threshold has dropped from $50 million as a COVID-19 provision). As the proposed development will be for the purposes of a warehouse or distribution centre with a CIV of $211.4 million (refer to Quantity Surveyor's Report at **Appendix G**), it is SSD by virtue of Clause 12 of Schedule 1 of SEPP SRD.
State Environmental Planning Policy (Infrastructure) 2007 (ISEPP)	The proposed development is traffic generating development under Clause 104 Division 17 of the ISEPP as it relates to development for the purposes of warehousing or distribution with a site area over 8,000m^2. The proposed development therefore requires referral to Transport for NSW.
*State Environmental Planning Policy (Western Sydney Employment Area) 2009 (*WSEA SEPP)	The WSEA SEPP provides consistent zoning and development control provisions to facilitate future development of the WSEA for the primary purposes of employment and industry. An assessment of the proposed development against relevant provisions of the WSEA SEPP is provided in **Section 5.2** below.
State Environmental planning Policy (Western Sydney Aerotropolis) 2020 (WSA SEPP)	Although the site is subject to the provisions of the WSEA SEPP, it is located in close proximity to the Western Sydney Airport under construction, and therefore is also subject to relevant provisions of the WSA SEPP. An assessment of the proposed development against these provisions is provided in **Section 5.3** below.
State Environmental Planning Policy No. 33 – Hazardous and Offensive Development (SEPP 33)	SEPP 33 applies to any proposals which fall under the policy's definition of 'potentially hazardous industry' or 'potentially offensive industry'. At this stage, it is not intended that any of the buildings at the site will provide for the storage of dangerous goods in excess of the thresholds established under the Department of Planning's guideline, 'Applying SEPP 33'. This issue is further discussed in the Preliminary Risk Assessment prepared by Riskcon at **Appendix M**, with further discussion in **Section 5.11** below.
State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)	Geotechnical and site investigations have confirmed that the site is generally suitable for the proposed development, with respects to SEPP 55. The site is generally not considered to be contaminated. This issue is further discussed at **Section 5.16** below and the following appended technical documentation: • Preliminary Environmental Site Investigation (59-63 Abbotts Road) prepared by Douglas Partners (**Appendix R**); • Preliminary Geotechnical Investigation (59-63 Abbotts Road) prepared by Douglas Partners (**Appendix S**); and • Geotechnical Investigation Report (290-308 Aldington Road) prepared by Alliance Geotechnical (**Appendix T**).
State Environmental planning Policy No. 64 – Advertising and Signage (SEPP 64)	SEPP 64 applies to advertising and signage within NSW. It aims to ensure that advertising and business or site identification signage is compatible with the desired amenity and visual character of an area; provides effective communication in suitable locations; and is of high quality design and finish. The proposed signage zones comply with the assessment criteria in SEPP 64 as follows: • the signage is commensurate with the future character of the area and is suitable given its location within an industrial estate; • the signage will be located on a facility within a future industrial area. It will not detract from the amenity or visual quality of any sensitive areas; • the signage does not block views or vistas or penetrate the skyline; • the proposed signage is commensurate with the nature of the proposed facility, which has been designed in terms of colour scheme to be complimentary to the future branding; • the signage may contain internal illumination; • illumination or lighting could be managed to ensure no adverse impacts; however, it is noted that there is no sensitive receivers surrounding the site; and • the signage will not impede safety sightlines. Future assessment against SEPP 64 and separate approval will be required for detailed signage proposed in the signage zones.
Penrith Local Environmental Plan 2010 (PLEP 2010)	Prior to the amendment to the WSEA SEPP, the site was zoned RU2 Rural Landscape under the Penrith Local Environmental Plan 2010 and development for the purposes of warehouse or distribution centre was not permissible with consent. Given the amendments to the WSEA SEPP are now in place, the Penrith Local Environmental Plan 2010 no longer applies to the site.
Strategic Planning Documentation	

Strategy	Assessment
Greater Sydney Region Plan – A Metropolis of Three Cities	The Greater Sydney Regional Plan is the overarching strategic plan that seeks to shape future development for the Sydney metropolitan area over the next 40 years. Under the Regional Plan, Sydney will comprise three cities, with the site located within the Western Parkland City. The Western Parkland City will be centred on the new international Western Sydney Airport and Badgerys Creek Aerotropolis, while capitalising on the established centres of Liverpool, Greater Penrith and Campbelltown-Macarthur. It is envisioned that the Western Economic Corridor will attract globally significant defence and aerospace activities and contribute to a strong trade, freight, logistics, advanced manufacturing, health, education and science economy. This will create employment close to areas of high population growth and drive the development of the corridor and the metropolitan cluster. The proposed development is consistent with the relevant objectives of the Region Plan: *Objective 20 – Western Sydney Airport and Badgerys Creek Aerotropolis are economic catalysts for Western Parkland City*. Objective 20 contemplates the development of the Western Sydney Airport and the Aerotropolis as an economic catalyst for the broader Western Parkland City. In particular, the Airport (and the proposed transport initiatives to support the Airport) will increase the significance of the Western Sydney Employment Area and its role as a long-term land supplier for industrial and employment activities. The proposed development will support internationally competitive freight and logistics centres which will leverage and grow from their proximity to the Airport. *Objective 23 – Industrial and urban services land is planned, retained, and managed*. The proposed development will support the provision of in-demand industrial land which will support the retention and enhancement of industrial land within Greater Sydney. *Objective 33 – A low-carbon city contributes to net-zero emissions by 2050 and mitigates climate change*. The proposed development will consider a suite of energy efficiency measures to improve the energy efficiency and contribute to reduced greenhouse gas emissions. The improved building efficiency measures are outlined in **Section 5.20** below and the Sustainability Management Plan prepared by SLR Consulting at **Appendix X**.
Western City District Plan	The Western City District Plan sets out the planning priorities and actions to manage growth and change in the Western City District. It is a guide for implementing the Region Plan, at a district level, and is a bridge between regional and local planning. The District Plan informs Local Strategic Planning Statements, preparation of Local Environmental Plans and assessment of Planning Proposals and Community Strategic Plans and policies. Due to the substantial similarity between the Region Plan and the more local application of the District Plan, the objectives identified above translate into the achievement of the following planning priorities under the District Plan. • *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.* • *Planning Priority W19 – Reducing carbon emissions and managing energy, water and waste efficiently.* In particular, the proposed development will provide substantive warehousing floorspace to support freight and logistics opportunities in the Parkland City. The Western Sydney Airport and Badgerys Creek Aerotropolis forms part of the cluster of centres within the Western District and provides an identified land use to support the delivery and operation of the Airport and Aerotropolis, supporting a range of jobs within the Parkland City.
Future Transport 2056 and supporting plans	The Future Transport 2056 strategy sets the 40-year vision, directions and outcomes framework for mobility in NSW, which will guide future transport investment over the long term. The supporting plans provide further detail on customer outcomes or place-based planning documents to guide the Strategy's implementation. The proposed development is consistent with the strategy and will support the improvement of the local road system, through the delivery of the delivery of external road upgrades including to Aldington and Abbotts Road, and the provision of a new signalised intersection at Mamre and Abbotts Road.

Strategy	Assessment
Mamre Road Precinct Structure Plan (DPIE, 2020) and the Local Road Network Structure Plan	Mamre Road Precinct is within the Western Sydney Employment Area and was rezoned in June 2020. The broad vision for the Mamre Road Precinct is outlined in the Structure Plan. The intent is to deliver approximately 850 hectares of industrial land as well as preserving land for environmental conservation, open space and the potential for a Western Sydney freight intermodal terminal. Under the Structure Plan, the site is identified for industrial land. The eastern boundary of the site has been identified as 'Transition to rural', and hence must be compatible with the adjacent R5 Large Lot Residential zoning at Mount Vernon (refer to **Section 5.23** below). The proposed development is consistent with these controls. The proposed internal road network and external road upgrades is consistent with the Local Road Network Structure Plan for the Mamre Road Precinct. The site is not within proximity of the proposed potential Southern Link Road, or any other potential connections in the area, including with regards to existing industrial road networks in the west.
Western Sydney Aerotropolis Plan (DPIE, 2020)	The Western Sydney Aerotropolis Plan (the Plan) was finalised in September 2020 and aims to set the vision for the Western Sydney Aerotropolis as 'Australia's next global gateway', built around the world-class Western Sydney International (Nancy-Bird Walton) Airport. It was implemented through the *State Environmental planning Policy (Western Sydney Aerotropolis) 2020* (WSA SEPP), the consistency of which was analysed above. Under the Plan, the Mamre Road Precinct is to become an industrial warehousing and logistics precinct, given its connection to the proposed Western Sydney Freight Line and proximity to future aircraft noise. The Plan identifies the following for the Mamre Road Precinct: • Desirable land uses including *warehousing and logistics, high technology industry, manufacturing, intermodal facilities, circular economy uses*; and • Strategic outcomes including in particular: - Opportunities for logistics and distribution, connecting Western Sydney to the broader freight network; - Support the future operations of the Airport through enabling export freight and logistics; and - Zoning to prioritise warehousing and distribution to support freight and logistics movements. Therefore, the proposed development is clearly consistent with the vision, desired land uses, and envisioned strategic outcomes of the Mamre Road Precinct.
Draft Mamre Road Precinct Development Control Plan	The design of the proposed development has been guided by the Draft Mamre Road Precinct Development Control Plan, which was publicly exhibited between 10 November and 17 December 2020, as discussed in the Urban Design Report prepared by Nettleton Tribe at **Appendix B**. A summary of the key control proposed in the DCP, and their relevance to the site is provided in **Section 5.4** below. A site-specific DCP as consistent with the Draft Mamre Road DCP has also been prepared at **Appendix AA**.
Draft Cumberland Plain Conservation Plan	The Draft Cumberland Plain Conservation Plan is a comprehensive conservation plan for Western Sydney and was on public exhibition from 26 August to 2 November 2020. When finalised, it will support biodiversity and growth in the Western Parkland City by protecting the region's important conservation values for future generations, including through the creation of new reserves, conservation areas and green space. The proposed development is broadly consistent with the aims and objectives of the Conservation Plan. It will improve tree cover at the site through landscaping opportunities and avoid and minimise biodiversity impacts through the provision of an ecologically sustainable and highly sustainable industrial warehousing estate at the site.

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

State Environmental Planning Policy (Western Sydney Employment Area) 2009 (WSEA SEPP) provides consistent zoning and development control provisions to facilitate development of the WSEA for the purposes of employment and industry. The WSEA SEPP is the primary Environmental Planning Instrument applicable to the site.

The WSEA SEPP has been subject to a recent amendment (placed on public exhibition between 20 November and 18 December 2019) which was gazetted on 12 June 2020. The amendment extends the controls of the SEPP to include the Mamre Road Precinct, and rezones it primarily for General Industrial (IN1) with other areas zoned Public

Recreation (RE1 and RE2), Environmental Conservation (E2) and Special Purpose infrastructure (SP2). The intent is to facilitate future development in the Mamre Road Precinct which can support in-demand industrial land supply.

As per the WSEA SEPP, the entirety of the site is zoned IN1 General Industrial (**Figure 24**). The uses proposed as part of the SSDA are permissible with consent under the zoning for the site.

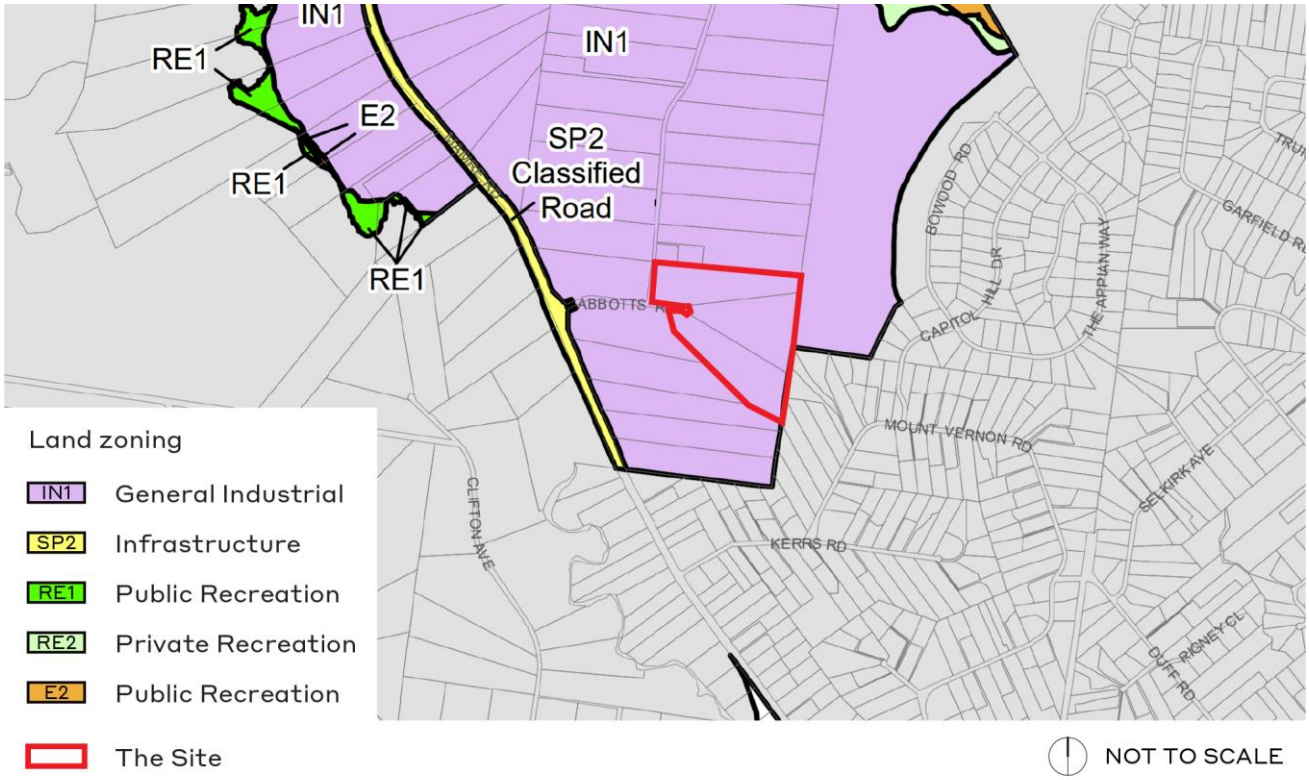

Figure 24 Zoning controls for the site

Source: WSEA SEPP, edits by Ethos Urban

The desired long-term outcomes for the Precinct are set out in the Mamre Road Precinct Structure Plan, as shown in **Figure 3**. Under the Structure Plan, the site is proposed for industrial land. The eastern boundary of the site has been identified as 'Transition to Rural', and hence must be compatible with the adjacent R5 Large Lot Residential zoning at Mount Vernon (refer to **Section 5.23** below).

The recent amendment to the WSEA SEPP also includes provisions requiring the concurrence of Transport for NSW with regard to the compatibility of the proposed development with the delivery and operation of an integrated freight network in the Precinct (under clause 33C of Part 6). The SEPP also requires that the EIS address potential impacts on the operation of the Western Sydney Airport with regard to aircraft noise, airspace operations and potential bird or wildlife attraction.

A summary of the proposed development's consistency with the WSEA SEPP is provided in **Table 5** below.

Table 5 Consistency with WSEA SEPP

Clause	Comment
11 – Zone objectives and land use table	As aforementioned, the site is zoned IN1 General Industrial in its entirety under the WSEA SEPP. The proposed development for the purposes of warehouses and distribution centres is permissible with consent and is consistent with the relevant objectives of the zone to encourage employment opportunities and facilitate a wide range of employment-generating landuses.
18 – Requirement for development control plans	As noted above, the Draft Mamre Road Precinct Development Control Plan has been prepared for the entirety of the Mamre Road Precinct by DPIE and encompasses the subject site. The design and built form of the proposed development responds to the requirements of the DCP. This is further discussed in **Section 5.4** below.

Clause	Comment
20 – Ecologically sustainable development	The proposed development encompasses ecologically sustainable development principles, as outlined in the Sustainability Management Plan prepared by SLR Consulting at **Appendix X**.
21 – Height of buildings	The height of the proposed buildings considers the topography of the site and will not adversely impact the amenity of any residential areas.
22 – Rainwater harvesting	The proposed development will incorporate rainwater harvesting measures, as further discussed in the Civil Infrastructure Report prepared by AT&L at **Appendix I** and **Section 5.9** below.
23 – Development adjoining residential land	The eastern boundary of the site has been identified as 'Transition to rural' and must be compatible with the adjacent R5 Large Lot Residential zoning at Mount Vernon. The design of the proposed development specifically sensitively responds to this issue, which is further discussed at **Section 5.23** below.
25 – Public utility infrastructure	Public utility infrastructure requirements have been assessed in the Civil Infrastructure Report prepared by AT&L at **Appendix I**. This issue is further discussed in **Section 5.5** below.
26 – Development on or in vicinity of proposed transport infrastructure routes	The development is not located on or within close proximity to a proposed transport infrastructure route.
29 – Industrial Release Area – satisfactory arrangements for the provision of regional transport infrastructure services	Satisfactory arrangements are proposed to be satisfied by way of works in kind (by way of a Voluntary Planning Agreement) for the upgrade of the Mamre Road / Abbott Road intersection. Further discussion is provided in **Section 5.22** below.
31 – Design Principles	An Urban Design Report has been prepared by Nettleton Tribe and is attached to this report at **Appendix B**. The report outlines the design principles which have guided the design of the proposed development with regards to scale and compatibility, landscaping, and materiality.
32 – Preservation of trees or vegetation	The site does not contain prescribed trees by an existing development control plan.
33C – Development within the Mamre Road Precinct	The site is located in the Mamre Road Precinct and has a capital investment value in excess of $200,000. Concurrence with Transport for NSW will be required under this clause.
33D – Development in areas subject aircraft noise	While the proposed development is proximate to the new Airport, it does not propose any sensitive land uses such as residential or childcare centres, and the uses proposed (being warehouses and distribution centres), will not result in any significant air emissions. Therefore, the proposed development will not result in any impacts to airspace operations.
33E – Airspace operations	
33F – Development of land adjacent to airport	The proposed development is located within 13km from the Airport boundary but will not attract birds or animals and will not impact on airport operations in the area.
33H – Earthworks	Consent is sought for earthworks, in accordance with the requirement of this clause. The proposed earthworks will not disrupt or have a detrimental effect on drainage patterns or soil stability or result in any adverse environmental impacts in general; and is required to carry out the proposed development as set out in this EIS.
33I – Development on flood prone land	The site is not identified as being flood prone land under the Penrith Overland Flow Study. Sedimentation and erosion control and stormwater management is addressed in the Civil Infrastructure Report prepared by AT&L at **Appendix I**, with further discussion in **Section 5.9** below.
33J – Heritage conservation	No heritage items are located on the site, and the site is not located within a Heritage Conservation Area. Nevertheless, as the site is located in close proximity to two Heritage items (refer to **Section 2.3.3** above), a Heritage Impact Statement has been prepared by Urbis and is attached to this report at **Appendix O**, with further discussion provided in **Section 5.13** below.
33L – Stormwater, water quality and water sensitive design	The proposed development will incorporate water quality and water sensitive urban design measures as per the Sustainability Management Plan by SLR Consulting at **Appendix X**.

5.3 State Environmental Planning Policy (Western Sydney Aerotropolis) 2020

Although the site is subject to the provisions of the WSEA SEPP, it is located in proximity to the Western Sydney Airport, and therefore is also subject to relevant provisions of *State Environmental Planning Policy (Western Sydney Aerotropolis) 2000* (WSA SEPP).

Specifically, Part 3 (Development Controls – Airport Safeguards) apply to land within the Western Sydney Aerotropolis (in which the site is located). An assessment of the relevant provisions in Part 3 of the Aerotropolis SEPP is provided below.

5.3.1 Aircraft noise (clause 19)

The site has an Australian Noise Exposure Forecast (ANEF) of partially 20, and partially 25 (refer to **Figure 25**). Accordingly, clause 19 of Part 3 of the SEPP WSA applies to the proposed development. Under the clause, development consent must not be granted for noise sensitive development (e.g., childcare facilities, educational establishments, exhibition homes, hospitals etc.) on land with an ANEF of 20 or greater. Being an industrial warehousing facility, the proposed development does not contain uses defined as noise sensitive development under clause 19(6).

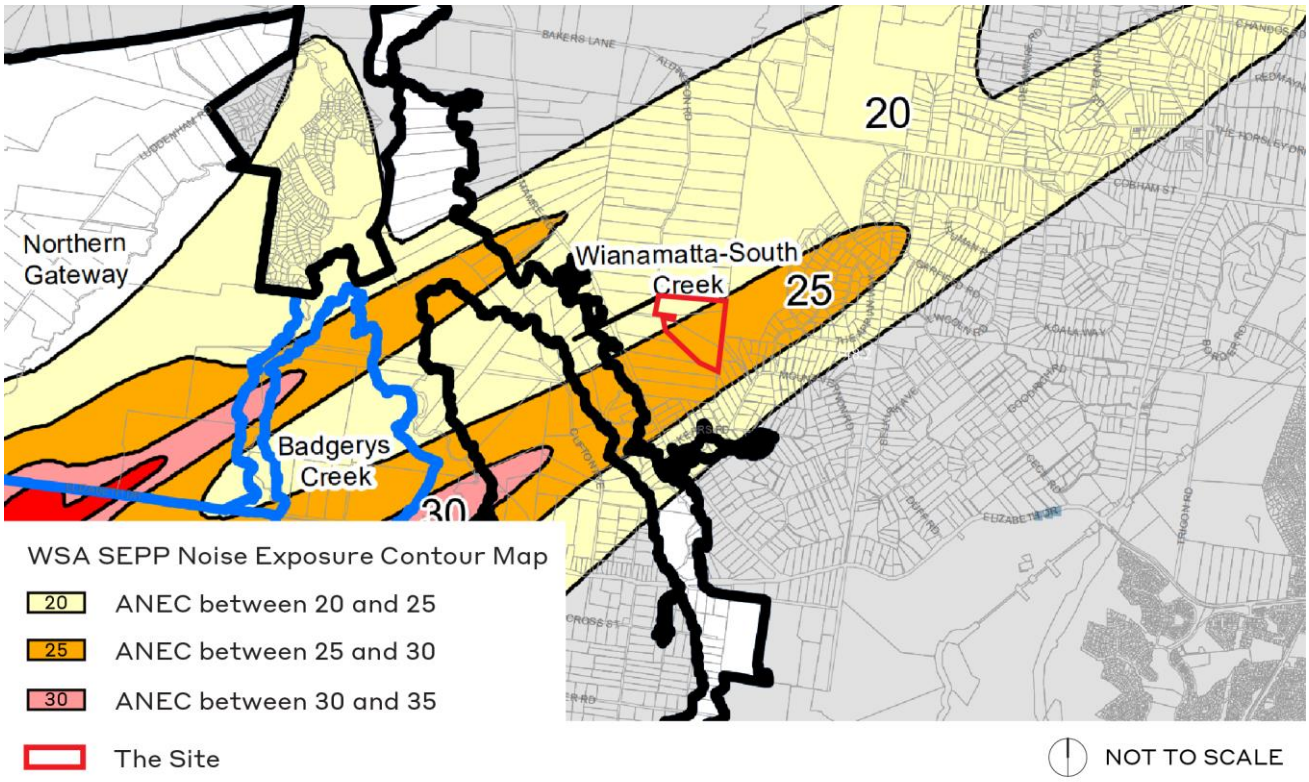

Figure 25 WSA SEPP Noise Exposure Contour Map, with the site shown in red

Source: WSA SEPP, edits by Ethos Urban

5.3.2 Building wind shear and turbulence (clause 20)

Clause 20 of the WSA SEPP seeks to protect airport operations from wind shear and turbulence generated by buildings. The clause applies to development within Lighting Intensity and Wind Shear Map or development that penetrates the 1:35 surface.

As the proposed development is not located on land subject to the Lighting Intensity and Wind Shear Map, and does not penetrate the 1:35 surface, it is not inconsistent with clause 20 of the WSA SEPP.

5.3.3 Wildlife hazards (clause 21)

The site is located inside the 8km wildlife buffer zone as identified under the Wildlife Buffer Zone Map of the WSA SEPP, but outside the 3km wildlife buffer zone. Clause 21 of the SEPP states that development consent must not be granted unless the consent authority is satisfied that the proposed development will mitigate the risk of wildlife to the operation of the airport.

Given the nature of the proposed use, the proposal is not considered attract wildlife which may impact the operation of the Western Sydney Airport. The proposed development is for warehouse and distribution purposes with storage of goods being enclosed within buildings. The site does not propose any waste management facilities.

5.3.4 Airspace operations (clause 24)

Clause 24 of the WSA SEPP states the development consent must not be granted unless the consent authority is satisfied that the proposed development will not penetrate the prescribed airspace of the airport, or that the development penetrates the airspace, but the relevant Commonwealth authority does not object to the development.

The site is located on land as being subject to RL 190-210 as shown in the Obstacle Limitation Surface Map of the WSA SEPP. The proposed development will not penetrate the prescribed airspace as it only seeks a maximum building height of RL 80m (refer to **Section 3.6**), well below the RL 190-210 limit for the site.

5.4 Draft Mamre Road Precinct Development Control Plan

The built form of the proposed development has been designed with regards to the Draft Mamre Road Precinct Development Control Plan. A summary of the key DCP controls used to inform the design of the proposed development is provided in **Table 6** below.

Table 6 Consistency with draft Mamre Road DCP

Issue	Control	Consistency
Site coverage	No maximum; defined by setbacks	Yes
Minimum lot size	Minimum 1,000m^2 for land zoned IN1 – General Industrial	Yes
Minimum frontage	Minimum 40m (excluding cul-de-sacs)	Yes
Minimum lot width	Minimum 35m (at building line) for lots >5,000m^2; minimum 60m for lots >10,000m^2	Yes
FSR	No applicable FSR control	Yes
Building height	Maximum 20m (unless otherwise approved by consent authority)	Yes
Building setback – primary frontage	Minimum 20m to Mamre Road (including minimum 10m landscaping) Minimum 7.5m to subdivision road (including minimum 3.5m landscaping)	Yes
Building setback – side	5m building (no minimum for landscaping)	Yes
Building setback – rear	5m building (2.5m landscaping setback)	Yes
Car parking	On-site vehicular car parking to be provided at the following rates: • Warehouse – 1 space/300m^2 GFA • Ancillary office – 1 space/40m^2 GFA • Industrial/manufacturing – 1 space/200m^2 GFA • Café/restaurant – 1 space/10m^2 of seating area • Accessible parking – 2 accessible spaces/100 spaces (as per BCA)	Yes
Road infrastructure	The internal industrial subdivision roads shall comprise of the following: • 24.5m road reserve for roads connecting to arterial roads including: - 1x 4m verge width (including a 1.5m concrete footway) - 1x 5m verge width (including a 2.5m concrete shared footway) - A 15.5m carriageway, comprising 7m for travel lanes in both directions and 2x 4.25m kerbside parking lanes. • 23m road reserve for internal estate roads including: - 1x 4m verge width (including a 1.5m concrete footway) - 1x 5m verge width (including a 2.5m concrete shared footway) - A 14m carriageway, comprising 7m for travel lanes in both directions and 2x 3.25m kerbside parking lanes.	Yes

Furthermore, for the purposes of completeness, a comprehensive assessment of the proposed development against the provisions of the Draft Mamre Road DCP has been undertaken by Ethos Urban, and is attached to this report at **Appendix Z**.
Notwithstanding its status as a Draft DCP, the assessment confirms that the proposed development is generally consistent with the provisions of the document. It is acknowledged that the south-eastern setbacks to Mount Vernon Rural Residential land, at 15 metres, is less than the 30 metres required under the draft DCP. However, the proposal will introduce a number of initiatives to ensure there are no adverse environmental impacts on the adjacent residential land, noting the natural slope of the site affords a level of visual and acoustic mitigation:

- A 22m landscaping setback has been provided along this interface boundary which will provide significant visual amenity with high canopy tree cover to screen from sensitive receivers;
- Warehouse loading docks have been designed on western side of warehouse 4 to avoid noise exceedances from traffic movements. The Noise and Vibration Assessment of the proposed development at **Appendix L** has confirmed there is to be no acoustic exceedances; and
- It should also be noted that due to the topography of the site, there is an approximate 20m level change from Warehouse 4a to the closest receiver adjacent the south east boundary.

5.4.1 Site-specific Development Control Plan

To ensure that development at the site will be consistent with the Mamre Road DCP in future, a site-specific DCP for the site has been prepared by ESR and is attached at **Appendix AA**. The site-specific DCP is based on the Draft Mamre Road DCP, with controls not relevant to the Westlink site excluded.

It is intended for the site-specific DCP to establish interim guidelines for development at the site and will be superseded when the Draft Mamre Road DCP is finalised and adopted.

5.5 Infrastructure requirements

The infrastructure requirements of the proposed development are discussed in the Civil Infrastructure Report and Plans prepared by AT&L at **Appendix I**, including a direct response to the relevant SEARs. The following is an overview summary of the infrastructure findings of the report:

- Based on investigations and ongoing discussion with Sydney Water, connection to the Oakdale West Development infrastructure at the north of the site will be utilised to provide potable water services. Subject to Sydney Water approval and further modelling, it is proposed to extend this 300mm main along Aldington Road to service the Site. The main will be cross connected to the existing water mains and through connected to the existing 2 x 150mm diameter main within Mamre Road.
- No existing sewerage infrastructure is located on the site or adjacent to the site. It is expected a new trunk main will be constructed along either Mamre Road or South Creek to a centralised pumping station to the North West. Delivery of this system is to be delivered by Sydney Water or ESR in combination with other developers as the trunk main will be installed along Abbotts Road to service development sites on Abbotts Road. Consultation with Sydney Water will continue; it is noted that Sydney Water is currently investigating servicing solutions for the wider Aldington Road precinct as part of the Aerotropolis servicing strategy.
- Consultation has been undertaken with Endeavour Energy regarding electrical servicing strategies for the Broader Western Sydney Employment Area (BWSEA) which includes the wider Aldington Road Precinct and the Site. The Endeavour Energy 'Western Sydney Priority Growth Area – Area Plan April 2018' indicates the proposed high voltage network to be delivered as part of the wider Endeavour Energy electrical network required to service the Aerotropolis. Further consultation with Endeavour Energy will continue.
- Telstra below ground conduits are located within the Aldington Road Reserve parallel to the boundary. Site inspections have identified there are aboveground assets along the western side of Aldington Road. It is expected connections to telecommunications infrastructure could be made from the existing infrastructure located within Aldington Road.
- There are no existing Jemena gas mains located within the vicinity of the Site.

5.6 Visual impact

A Visual Impact Assessment (VIA) of the proposed development has been prepared by Geoscapes Landscape Architects, and is attached to this report at **Appendix J**. The VIA assesses the visual impacts generated by the proposed development at the following 8 points (**Figure 26**):

- Junction of Abbotts Road & Mamre Road, Kemps Creek (VP1);
- Junction of Abbotts Road & Aldington Road, Kemps Creek (VP2; **Figure 27**);
- 284 Aldington Road, Kemps Creek (VP3; **Figure 28**);
- Aldington Road, Kemps Creek (VP4);
- 30 Belleview Ave, Mount Vernon (VP5);
- 247 Capitol Hill Drive, Mount Vernon (VP6; **Figure 29**);
- 52A Mount Vernon Road, Mount Vernon (VP7; **Figure 30**); and
- Mamre Road, Kemps Creek (VP8).

Justification and rationale on why each viewpoint was chosen is provided within the VIA.

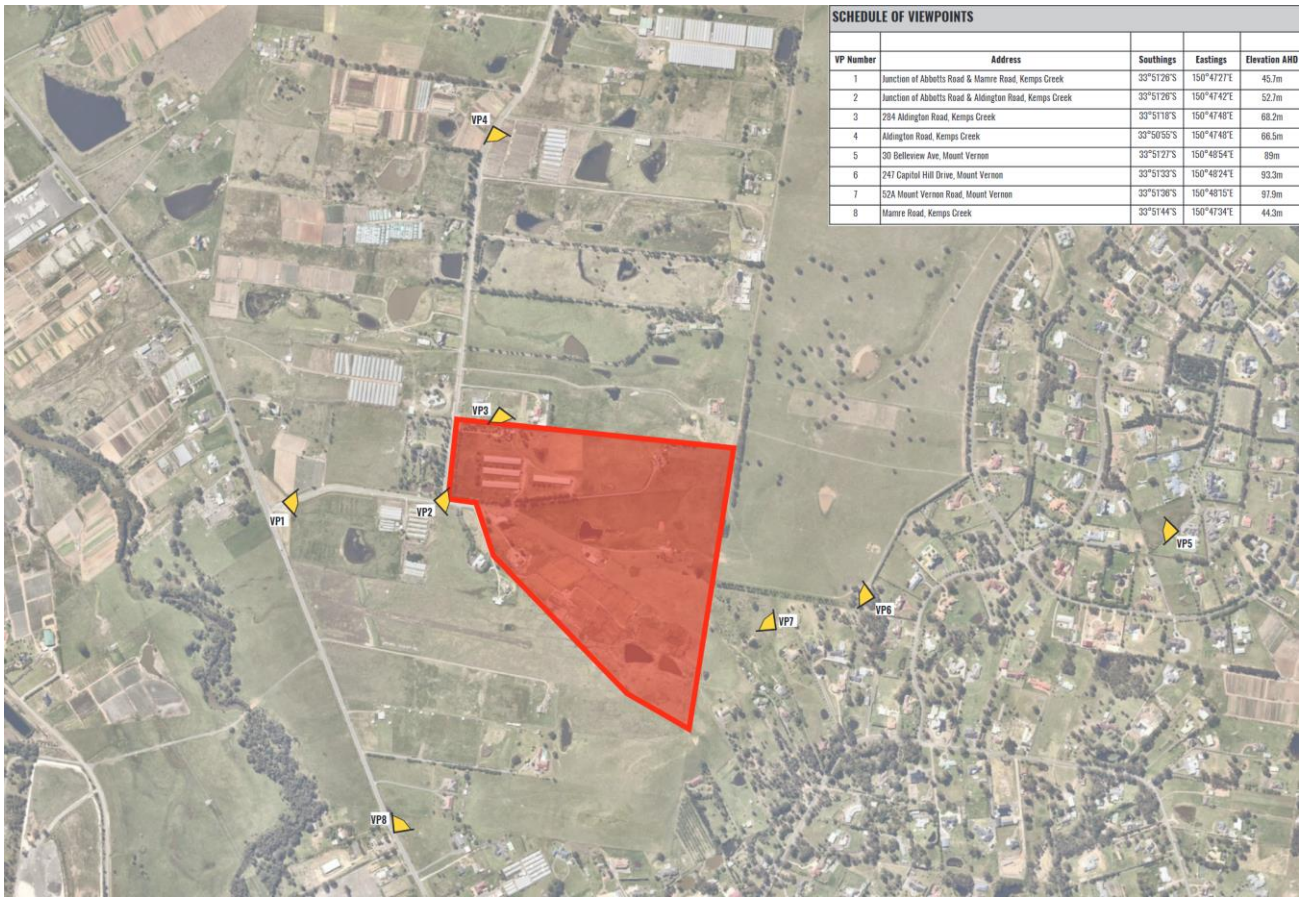

Figure 26 VIA viewpoints analysed

Source: Geoscapes Landscape Architects

Because the surrounding area has been rezoned for industrial development, visual impacts are generally to be short to medium term only (excepting the viewpoints from the Mount Vernon residential area at VP5, VP6, and VP7).

Overall, the VIA found that, for the viewpoints to eventually be redeveloped into industrial uses:

- VP3 is likely to receive moderate short to medium term visual impacts;
- VP1, VP2 and VP8 are likely to receive moderate/minor short to medium term visual impacts; and

- VP4 is likely to receive minor short to medium term visual impacts

With regards to the Mount Vernon residential area:

- VP6 and VP7 are likely to receive moderate visual impacts; and
- VP5 will receive minor visual impacts.

However, the VIA notes that the proposed development responds to the sensitivity of nearby residential receivers at Mount Vernon through a number of visual mitigation measures, including significant landscape planting at the eastern boundary. This can be highly effective in helping to reduce visual impacts for a number of sensitive close range properties. This will be most effective after 15 years and for those receptors who experience direct views at close to medium range. Mature landscape planting should help to effectively screen view corridors to many of the warehouse elements, also responding to the ‘‘Transition to Rural’ requirements of the Mamre Road Structure Plan.

Figure 27 Expected visual impact – viewpoint 2

Source: Geoscapes Landscape Architects

Figure 28 Expected visual impact – viewpoint 3

Source: Geoscapes Landscape Architects

Figure 29 Expected visual impact – viewpoint 6

Source: Geoscapes Landscape Architects

Figure 30 Expected visual impact – viewpoint 7

Source: Geoscapes Landscape Architects

5.7 Traffic and transport impact

A Transport & Accessibility Management Plan (TAMP) of the proposed development has been prepared by Ason Group, and is attached to this report at **Appendix K**. The TAMP sets out the expected transport and traffic impacts of the proposed development, and how these impacts are to be managed.

The expected trip generation of the proposed development when complete is summarised in **Table 7** below. Justification of the rates chosen is provided within the report.

Table 7 Expected trip generation

Statistic	Rate per 100m^2	Trips
Total daily trips	2.91	4,224
Local Road AM peak (7:00 – 8:00)	0.23	334
Local Road PM peak (16:00 – 17:00)	0.24	348
Site Maximum Generation Rate (all vehicles)	0.26	377
Site Maximum Generation Rate (heavy vehicles)	0.07	102

The site is well located for industrial development, with excellent existing and future connections to the sub-regional and regional network, as well as key growth centres across Western Sydney. SIDRA analysis has identified the required interim configuration of the future intersection for Mamre Road & Abbotts Road to facilitate development of the Proposal, alongside a small proportion of surrounding development, along Aldington Road and Abbotts Road. The analysis indicates that an interim signalised intersection design, as provided for by the proposed development with single turning lanes and 2 lanes in Mamre Road – would more than provide for the development of the Proposal by 2026.

The report confirms that all international circulation areas, hardstand and parking areas have been designed with reference to the Australian Standards and provide for vehicles up to and including a 26m B-Double, and that all

access driveways, parking areas and service areas have been designed with reference to the appropriate Australian Standards. It is anticipated that full design compliance with the relevant Australian Standards would form a standard Condition of Consent further to approval, which will also provide for any minor design changes if required.

Notwithstanding the site currently being constrained by limited public transport availability, a Framework Sustainable Travel Plan has been appended to the TAMP that outlines proposed initiatives to reduce car dependency at the site.

5.8 Road network

The proposed road network of the industrial estate is discussed in the Civil Infrastructure Report and Plans prepared by AT&L at **Appendix I**, specifically in Chapter 8 of the report. In summary, the following findings were provided in the report with regards to the road network:

- The proposed industrial estate will provide connection to adjoining lots to the south east for future development via further extension of Abbotts Road beyond the cul-de-sac currently proposed towards the south-east of the proposed development. It is proposed that detailed coordination of precinct connectivity may occur post formal SSD exhibition stage to enable concurrent development of the *Aldington Road Precinct Structure Plan – Local Road Network Structure Plan* by TfNSW and Penrith City Council.
- Access for the site is off Abbotts Road via a proposed three-way junction at the intersection of Abbotts Road and Aldington Road. This three-way junction is designed to provide a future roundabout intersection for future road Aldington Road extension in the southerly direction. The existing Abbotts Road cul-de-sac is proposed to be extended further to the south-easterly direction with a proposed cul-de-sac providing vehicular access to the overall development.
- Abbotts Road and pedestrian networks are proposed to be provided in accordance with Penrith City Council's standard DCP requirements with exception of a proposed wider verge on the shared pathway side to enable a consistent landscape zone within both road verges
- Swept path diagrams have been provided in the Civil Plans attached to the Civil Infrastructure Report and Plans at **Appendix I**.
- Details of road upgrades, infrastructure works, and new roads and access points have also been provided within the Civil Plans.

5.9 Soil and water

Assessment of the proposed development with regards to soil and water is provided within the Civil Infrastructure Report and Plans prepared by AT&L at **Appendix I**. Chapter 6 of the report responds to Sedimentation and Erosion Control measures, Chapter 9 of the report responds to Stormwater Management, and Chapter 10 of the report responds to Water Balance.

5.9.1 Sedimentation and erosion control

A Soil and Water Management Plan (SWMP) has been prepared in accordance with the NSW Department of Housing Publication titled: Managing Urban Stormwater – Soils and Construction (2004) for the whole site to minimise erosion, sediment transport, siltation and contamination of natural waters as a result of the proposed development.

The following construction methodology will be followed to minimise the impact of sedimentation due to construction works:

- Diversion of "clean" water away from the disturbed areas and discharge via suitable scour protection;
- Provision of hay bale type flow diverters to catch drainage and divert to "clean" water drains;
- Diversion of sediment-laden water into temporary sediment control basins to capture the design storm volume and undertake flocculation (if required);
- Provision of construction traffic shaker grids and wash-down to prevent vehicles carrying soils beyond the site; • Provision of catch drains to carry sediment-laden water to sediment basins;
- Provision of silt fences to filter and retain sediments at source;

- Rapid stabilisation of disturbed and exposed ground surfaces with hydro-seeding areas where future construction and building works are not currently proposed;
- All temporary sediment basins will be located clear of the 100yr ARI flood extent from South Creek and all associated tributaries;
- The weir levels of temporary sediment basins will be located above the 100yr ARI flood event levels from Ropes Creek and tributaries; and
- Bio-retention basins are to be utilised as temporary sediment control basins. The bio-retention basins shall not be converted into the final/ultimate basins until such time as all building and construction works within the site has been completed and 90% of the site is stabilised.

Suitable erosion and sediment controls will be provided by the Contractor and maintained throughout all stages of works, including at completion of the bulk earthworks. Regular site inspection and maintenance is to be carried out while earthworks and quarrying is being conducted. The Contractor will inspect the site after every rainfall event at least weekly.

The Civil Engineering Report confirms that the erosion control measures proposed for the site will comply with the requirements of Penrith City Council Engineering Guidelines and The Department of Environment, Climate Change and Water (DECC).

5.9.2 Stormwater management

The proposed development incorporates an On-Site Detention (OSD) system limit discharges to pre-developed rates, ensuring that downstream catchments will not be inundated with flows and cause adverse flooding affects downstream of the development. The external catchment is proposed to be diverted through the pipe network on site to connect to the proposed pipe along Abbotts Road which eventually discharges into the existing gully across Mamre Road until the proposed stormwater system is constructed within Mamre Road.

The proposed OSD basin will have an outlet structure to drain the OSD basin into a pipe system in a westerly direction towards the existing gully under Mamre Road. For the storm events above the 1% AEP, the OSD basin will utilise an overflow weir system to drain overland on the neighbouring lot to the west. Appropriate flow dissipation will be utilised to control the flow depth and velocity. The system will discharge overland to a piped road crossing under Mamre Road. Eventually, when the stormwater system is completed on the upgrade to Mamre Road, the outlet from the basin will connect into this infrastructure.

The eastern external catchments will be conveyed via a separate pipe system through the Abbotts Road extension and will be combined with the discharge pipe from the bio-retention basin. The northern external catchment will be conveyed via a separate pipe system along the northern site boundary and into the Aldington Road proposed drainage line. This drainage line drains to the south into the existing piped road crossing at the intersection of Aldington Road and Abbotts Road.

In summary, the Civil Engineering Report confirms that all stormwater drainage as part of the proposed development has been designed in accordance with the Penrith City Council Engineering Guidelines. This includes design of the stormwater network (pits and pipes), On-Site Detention basins and WSUD infrastructure. To summarise:

- OSD has been to be sized to ensure that for all rainwater events up to and including the 1:100 ARI event, does not increase stormwater peak flows in any downstream areas;
- OSD to mitigate post development flows to pre-developed flows for peak Average Reoccurrence Interval (ARI) events;
- WSUD to achieve target reductions:
  - 85% Total Suspended Solids (TSS);
  - 60% Total Phosphorus (TP);
  - 45% Total Nitrogen (TN);
  - 90% Gross Pollutants (GP); and

- Finished Floor Levels (FFL) to have minimum 500mm freeboard to 100-year overland flows.

5.9.3 Water balance

Water demands for irrigation and toilet flushing within the development will be met through the use of recycled roof water drained directly into a rainwater tank. The tank will be sized to ensure the site meets the requirement to meet the 80% non-potable reuse requirement in accordance with Penrith City Council's WSUD policy.

80% of all non-potable water on each lot can be sourced from the tank, demonstrates a commitment to water recycling and minimising the usage of mains water. This is in line with the industry best practise and the NSW Stage Government's objective of reducing the amount of potable water consumed for non-potable uses.

5.10 Noise and vibration

A Noise and Vibration Assessment of the proposed development has been prepared by RWDI, and is attached to this report at **Appendix L**. The report assesses the noise and vibration impacts of the proposal with regards to operational noise, construction noise and vibration, and the impacts of aircraft noise on the operation of the proposed industrial estate.

Overall, the Noise and Vibration Assessment found that:

- The proposed development will not result in adverse acoustic impacts during its operation. Specifically, the predicted operational noise impacts of the proposed development remain below the relevant noise criteria requirements at all times of day as per the NSW *Noise Policy for Industry* (2017).
- Noise generation from vehicular movements around the site comply with the criterion for 'Arterial' and ;Local roads' along Mamre and Abbotts road respectively, and no mitigation is considered to be required as a result.
- For most construction activities, it is expected that the construction noise levels would be frequently below what is predicted at the most-exposed receiver in the Assessment as the noise levels presented are a realistic worst-case assessment. Nevertheless, without mitigation, noise levels from construction activities have been predicted to exceed the noise management levels nominated in the guidelines at some surrounding receivers. Specifically:
  - During standard construction hours, exceedances of up to 4dB are predicted at the most affected residential receivers located to the south-east, south and south-west of the development during excavation and roadworks.
  - No exceedances are predicted during standard construction hours for the other construction activities modelled.
  - There are no noise sensitive receivers that are considered to be Highly Noise Affected, i.e., with predicted noise levels exceeding 75dB L_{Aeq}.
- Therefore, noise reduction measures will be implemented to ensured that noise is reduced where feasible, including through the following initiatives:
  - Avoiding the coincidence of noisy plant working simultaneously close together would result in reduced noise emissions.
  - Equipment which is used intermittently is to be shut down when not in use.
  - Where possible, equipment with directional noise emissions should be oriented away from sensitive receivers.
  - Regular compliance checks on the noise emissions of all plant and machinery used for the proposal would indicate whether noise emissions from plant items were higher than predicted.
  - In addition to more specific mitigation measures as given within the report.
- Following the implementation of the above mitigation measures, the proposed development should not result in adverse acoustic impacts during construction.
- The Aircraft Noise Assessment has found that no further treatment to the proposed buildings would be required to comply with AS2021:2015 internal assessment requirements.

5.11 Hazard and risk

A Preliminary Risk Assessment of the proposed development against the relevant provisions of *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development* (SEPP 33) has been prepared by Riskcon and is attached to this report at **Appendix M**. SEPP 33 applies to any proposals which fall under the policy's definition of 'potentially hazardous industry' or 'potentially offensive industry'.

The Preliminary Risk Assessment notes that the development does not have any allocated tenants at this stage and so the presence of Dangerous Goods within the development are unknown; nevertheless, it is not intended that any of the buildings at the site will provide for the storage of dangerous goods in excess of the thresholds established under the Department of Planning's guideline, 'Applying SEPP 33'.

Furthermore, it is not intended that any of the building occupiers would require an Environment Protection Licence from the EPA. As such, the proposed development does not constitute or permit in the future potentially hazardous or offensive industry. If in the future a potentially hazardous or offensive industry is proposed, it will be subject to future Development Applications and assessment under SEPP 33.

5.12 Biodiversity impact

A Biodiversity Development Assessment Report (BDAR) of the proposed development has been prepared by Eco Logical, and is attached to this report at **Appendix N**. The BDAR describes the biodiversity values within the development site, describes the impacts and outlines the measures to be taken to avoid, minimise and mitigate impacts to the Plant Community Types and threatened species habitat present within the development site. The report provides the number of biodiversity credits that would be required to be retired to offset the residual loss of biodiversity from the impacts of the development as described.

Overall, the BDAR has found the following:

- A portion of the existing driveway and road verge have been planted with native vegetation which at times represents locally indigenous species. An assessment in accordance with the Biodiversity Assessment Method 2017 (BAM) was undertaken and determined that the planted native vegetation does not require assessment of impacts under the BAM.
- The proposed industrial development will result in the removal of 0.70 ha of planted native vegetation and 3.51 ha of native vegetation (PCT 849). No ecosystem credits were required for the proposed development.
- Two Plant Community Types (PCT) have been mapped within the development site, *PCT 849 Cumberland Shale Plains Woodland* and *PCT 1071 Phragmites australis and Typha orientalis coastal freshwater wetlands of the Sydney Basin Bioregion*:
  - *PCT 849 Cumberland Shale Plains Woodland* is listed as a component of the critically endangered ecological community *Cumberland Plain Woodland in the Sydney Basin*. The vegetation was in poor condition and did not satisfy listing under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). It had a low integrity score and did not require an offset.
  - A small amount of semi-aquatic and fringing native vegetation around the dams will be directly affected resulting in the removal of 0.07 ha of *PCT 1071 Phragmites australis and Typha orientalis coastal freshwater wetlands of the Sydney Basin Bioregion*. The vegetation integrity score was low (8.3) and therefore, this PCT does not require an offset.
- Targeted surveys were conducted for one species credit species, *Meridolum corneovirens* (Cumberland Plain Land Snail). No individuals were located. It was determined that the vegetation in the development site does not contain suitable habitat for this species and therefore, no species credits are required.
- One Matters of National Environmental Significance have potential to be affected by the proposal: *Pteropus poliocephalus* (Grey-headed Flying-Fox). An assessment of the Commonwealth Significant Impact Criteria under the EPBC Act was undertaken for this entity and concluded the works are unlikely to have a significant impact on Matters of National Environmental Significance.
- The proposed development has one Serious and Irreversible Impact (SAII) candidate entity, Cumberland Plain Woodland. The proposed development will impact upon this SAII entity through the removal of 3.51ha of

Cumberland Plain Woodland. An SAII assessment has been undertaken for this community, however, there are currently no thresholds for whether the proposed works will trigger a SAII. It was found that:

- The proposed development is unlikely to affect abiotic factors critical to the survival of Cumberland Plain Woodland outside of the propose clearing area; and
- The development will not impact upon characteristic and functionally important species outside of the impact areas. The Cumberland Plain Woodland present is species poor and does not contain the features associated with this community.

5.13 Heritage impact

A Heritage Impact Assessment (HIS) of the proposed development has been prepared by Urbis, and is attached to this report at **Appendix O**. As noted above, the site does not contain any heritage items and is not located within a Heritage Conservation Area; nevertheless, heritage items of local significance under Schedule 5 of the WSEA SEPP can be found in proximity to the site, including one item directly adjacent. In summary, the HIS found that:

- Existing buildings at the site do not contain heritage value, and therefore there exists no heritage reasons to preclude their demolition;
- The proposed development will not adversely impact the heritage significance of the adjacent heritage item, 'I4 – Brick farmhouse'. The outward views from this heritage item are predominantly towards the north and west, whilst the site is located towards the south. Furthermore, a number of existing structures are located between the heritage building and the subject site, acting as an additional visual barrier. The proposed development is consistent with the desired future industrial character of the area, and the heritage item itself is a highly altered former farmhouse which has lost its original setting, curtilage, built form and landscape through subsequent development and subdivisions
- The proposed development will not have no discernible adverse visual or physical impacts on the other heritage items further afield ('I3 – Gateposts to Colesbrook' and 'I2 – Bayley Park') in the locality. All heritage items will retain their existing listing protection and no physical works are proposed to any of the heritage items.

Therefore, the HIS found no reason to not approve the proposed development from a heritage perspective.

5.14 Aboriginal heritage impact

An Aboriginal Cultural Heritage Assessment Report (ACHAR) and Archaeological Technical Report for the proposed development have been prepared by Urbis, and are attached to this report at **Appendix P**. The ACHAR identifies the impacts of the proposed development on the Aboriginal cultural heritage values that exist in the area and has been structured to directly respond to the issued SEARs. The ACHAR process includes:

- A comprehensive background research of all available archaeological and cultural heritage information for the subject area in context with the scope of the project;
- Analysis and interpretation of the background research;
- Archaeological field survey of the subject area;
- Consultation with the Registered Aboriginal Parties (RAPs);
- Site inspection and meeting with the RAPs; and
- Summarising of results and providing recommendations for the proposed development in relation to Aboriginal cultural heritage and archaeological resources.

Appended to the ACHAR is an Archaeological Technical Report. The ACHAR and Technical Report confirm that there are no Aboriginal sites registered within the subject area, or sites located within 1km of the subject area. Following the conclusion of the test excavation programme, a total of thirteen (13) artefacts were recovered, with this very small artefact assemblance suggesting a transitional, low frequency use of the site by Aboriginal people.

The ACHAR was sent to Registered Aboriginal Parties (RAPs) with one response received, which has been incorporated into the final ACHAR at **Appendix P**.

Based on the conclusions of the assessment undertaken, and the consultation carried out, there are five recommendations to be implemented for the proposed works:

- Recommendation 1: Surface Collection;
- Recommendation 2: Aboriginal Cultural Heritage Induction;
- Recommendation 3: Archaeological Chance Find Induction;
- Recommendation 4: Human Remains Procedure; and
- Recommendation 5: RAP Consultation.

Further detail is provided in the ACHAR at **Appendix P**.

5.15 Social and economic impact

A Social and Economic Impact Assessment of the proposed development has been prepared by Ethos Urban, and is attached to this report at **Appendix Q**. The report confirms that the development will result in significant positive social and economic benefits for the local and broader community, leading to the creation of additional employment opportunities along with growth in private business investment to create a sustainable funding base and employment precinct in the Western Sydney Employment Area.

Importantly, the proposed development will deliver a modern and integrated industrial facility within a strategic employment precinct that will accommodate and encourage the growth of higher order jobs and attract high value tenants and business to Western Sydney. Specifically, the proposed development will accommodate up to 841 Full-Time Equivalent (FTE) jobs during the construction phase, and 888 direct FTE jobs once complete and fully operational. The project will stimulate local investment and contribute significant economic output and value add to the economy each year and support the role of the Mamre Road Precinct as a key industrial and employment precinct.

The development will impact upon the way of life for existing and nearby residents both in positive and negative ways. This is due to the change in use of the land from rural to industrial uses, the increase of density of development on the site and the upgrade and introduction of new roads within the existing network. All of these social impacts were previously considered in the rezoning of the land from rural to industrial and are inevitable with the strategic direction to introduce industrial development in the area.

5.16 Contamination and geotechnical

Separate geotechnical investigations were commissioned for different components of the site, namely that of 59-63 Abbotts Road and 290-308 Aldington Road (refer to **Section 2.2** above).

A Preliminary Environmental Site Investigation (PESI) of 59-63 Abbotts Road has been prepared by Douglas Partners, and is attached to this report at **Appendix R**. The report confirms that the potential for the presence of significant contamination constraints at 59-63 Abbotts Road is low, notwithstanding a localised filling impacted with metals and asbestos in the western portion of Lot 11 and filling impacted with asbestos in a gully on Lot 12, which requires further investigation and/or remediation prior to bulk earthworks. Accordingly, a Detailed Site Investigation (DSI) of 59-63 Abbotts Road will be undertaken including delineation of metal and asbestos impact observed in the PESI to ascertain whether or not each identified Potential Area of Environmental Concern (PAEC) require further management and/or remediation prior to commencement of the development.

A separate PESI was prepared by Alliance Geotechnical for 290-308 Aldington Road (**Appendix R**) which provides that the detected concentrations of identified contaminants of potential concern are considered unlikely to present a human health risk or ecological health risk. No asbestos was identified within the soil samples collected, and the concentrations of nutrients in the soils assessed are considered to be similarly low across the entire site. Based on this, no further investigation, management and/or remediation is considered necessary.

Accompanying the PESIs for both parts of the site is a Preliminary Geotechnical Investigation (PGI) for 59-63 Abbotts Road, which was prepared by Douglas Partners and attached to this report at **Appendix S**. The aim of the investigation was to provide preliminary information on the subsurface conditions for due diligence purposes and

conceptual planning. In summary, the PGI confirms that 59-63 Abbotts Road is suitable from a geotechnical perspective for the proposed development.

The Geotechnical Investigation Report (GIR) for 290-308 Aldington Road has been prepared by Alliance Geotechnical and is attached to this report at **Appendix T**. The report concludes that the major geotechnical constraints for the proposed development at 290-308 Aldington Road are the required excavation and bulk filling with non-putrescible fill to achieve the founding levels of the proposed industrial warehouses; a maximum excavation depth of about 9m in the north eastern part of the site and fill placements in the order of 8 to 10m in the southern part of the site are required to achieve the final pad levels of the proposed warehouse and office buildings. Further geotechnical investigation will be carried out prior to the detail design of the development.

5.17 Bushfire impact

A Bushfire Protection Assessment of the proposed development has been prepared by Australian Bushfire Protection Planners, and is attached to this report at **Appendix U**. As noted in **Section 2.3.5** above, the site is identified as 'Vegetation Category 2' bushfire prone land under the Penrith Bush Fire Prone Land Map. The proposed development's consistency with the aims and objectives of *Planning for Bushfire Protection 2019* is provided in **Table 8** below.

Table 8 Compliance with aims and objectives of *Planning for Bushfire Protection 2019*

Bushfire protection measure	Compliance assessment
Defendable Space setbacks/construction standards to future industrial buildings	The combination of a Defendable Space and construction standards to the future industrial buildings located adjacent to the bushfire hazard addresses the requirement that the occupants are afforded adequate protection from exposure to a bushfire and that the buildings will not be exposed to material ignition.
Access for fire-fighting operations	The proposed public access roads comply with the specifications of Appendix 3 of *Planning for Bushfire Protection 2019* and provide satisfactory emergency access for fire-fighting appliances. Access for fire-fighting operations to be provided to the perimeter of the lots adjoining the bushfire hazard located within the Defendable Space setback. Positive Covenant to be recorded on title of each lot located adjacent to the bushfire hazard for access for fire-fighting operations.
Water supplies for fire fighting	Hydrant supply to be installed in accordance with AS 2419.1 – 2005.
Management of the fire protection measures, including the defendable spaces	Each lot owner is to be responsible for the maintenance of the recommended fire protection measures and provision of the perimeter fire access road. Positive Covenant to be recorded on title of each lot.
Emergency management	Owners of buildings shall address protocols for the management of staff and site facilities during bushfire occurrences

Therefore, the proposed development complies with the aim and objectives of *Planning for Bushfire Protection 2019* and the deemed to satisfy requirements of Section 8.3.10 of *Planning for Bushfire Protection 2019*.

5.18 Air quality

An Air Quality Assessment of the proposed development has been prepared by RWDI, and is attached to this report at **Appendix V**. The assessment provides analysis of the air quality impact of the proposed development on surrounding sensitive receivers during the construction and operation of the proposed development and recommends mitigation measures to minimise the impact.

The report concludes that the construction of the proposed development is unlikely to result in adverse air quality impacts. The construction phases can be adequately managed so that the short-term and temporary dust related impacts will remain to be low risk.

Operation of the proposed development will not generate adverse air quality impacts as vehicular emissions from traffic accessing the site will be of a similar nature to those already emitted by road traffic on the surrounding road network. Furthermore, as the surrounding area is developed into an industrial precinct in the future, the sensitivity of surrounding receivers will also decrease.

5.19 Waste management

A Waste Management Plan (WMP) for the proposed development has been prepared by SLR Consulting, and is attached to this report at **Appendix W**. The WMP identifies all potential waste likely to be generated by the proposed development during its demolition, construction and operational phases, including descriptions on how the waste is to be handled, processed, and disposed of, or re-used and recycled as consistent with Council requirements.

The likely expected waste generation during the demolition stage of the proposed development are as follows (**Figure 31**):

Location	Area (m^2)	Waste types and approximate quantities (m^3)					
		Sandstone	Concrete	Bricks	Timber/Gyprock	Steel	Other
Residential dwellings	2748	1845	15	20	105	5	20
Existing farm buildings	5,815	0	2610	1760	35	200	155

Figure 31 Expected waste generation – demolition

Source: SLR Consulting

The likely expected waste generation during the construction stage is shown in **Figure 32** below. The likely expected waste generated during the operation of the proposed facility is provided in **Figure 33**.

Lot	Area of project	Area (m²)	Waste types and quantities (m³)						
			Timber	Concrete	Bricks	Gyprock	Sand and Soil	Metal	Other
Lot 1	Warehouse	28,545	10	60	50	15	140	20	15
	Office (2 levels)	900	5	20	10	10	10	5	5
	Dock office	50	5	5	5	5	5	5	5
	Hardstand area	12,840	0	395	0	0	185	60	105
	Light Duty Area	3,530	0	110	0	0	55	20	30
	Total	45,865	20	590	65	30	395	110	160
Lot 2a	Warehouse	13,950	5	30	25	10	70	10	10
	Office (2 levels)	500	5	10	5	5	5	5	5
	Dock office	50	5	5	5	5	5	5	5
	Hardstand area	5,830	0	180	0	0	85	30	50
	Light Duty Area	1,770	0	55	0	0	30	10	15
	Total	22,100	15	280	35	20	195	60	85
Lot 2b	Warehouse	9,950	5	25	20	5	50	10	5
	Office (2 levels)	500	5	10	5	5	5	5	5
	Dock office	50	5	5	5	5	5	5	5
	Hardstand area	5,840	0	180	0	0	85	30	50
	Light Duty Area	1,390	0	45	0	0	20	10	15
	Total	17,730	15	265	30	15	165	60	80
Lot 3	Warehouse	31,600	10	70	55	15	155	20	20
	Office (2 levels)	1,000	10	20	10	10	10	5	5
	Dock office	50	5	5	5	5	5	5	5
	Hardstand area	14,660	0	450	0	0	210	70	120
	Light Duty Area	3,550	0	110	0	0	55	20	30
	total	50,860	25	655	70	30	435	120	180
Lot 4	Warehouse	30,600	10	65	55	15	150	20	20
	Office (2 levels)	1,400	10	30	15	15	15	5	10
	Dock office	100	5	5	5	5	5	5	5
	Hardstand area	9,170	0	285	0	0	135	45	75
	Light Duty Area	4,280	0	135	0	0	65	20	35
	total	45,550	25	520	75	35	370	95	145
Lot 5	Warehouse	23,140	10	50	40	15	115	15	15
	Office (2 levels)	1,000	10	20	10	10	10	5	5
	Hardstand area	9,770	0	300	0	0	140	45	80
	Light Duty Area	4,100	0	130	0	0	60	20	35
	total	38,010	20	500	50	25	325	85	135
Lot 6	Warehouse	13,950	5	30	25	10	70	10	10
	Office (2 levels)	500	5	10	5	5	5	5	5
	Dock office	50	5	5	5	5	5	5	5
	Hardstand area	7,070	0	220	0	0	105	35	60
	Light Duty Area	1,780	0	55	0	0	30	10	15
	total	23,350	15	320	35	20	215	65	95
Café		200	5	5	5	5	5	5	5

Figure 32 Expected waste generation – construction

Source: SLR Consulting

Location	Warehouse	Project area	Area (m²)	(L/day)		(L/week)	
				General Waste	Recycling	General Waste	Recycling
Lot 1	Warehouse 1a	Warehouse 1a	14,272	1,430	1,430	10,010	10,010
		Dock office	50	5	5	35	35
		Office (2 levels)	450	45	45	315	315
		Total	**14,772**	**1,480**	**1,480**	**10,360**	**10,360**
	Warehouse 1b	Warehouse	14,272	1,430	1,430	10,010	10,010
		Dock office	50	5	5	35	35
		Office (2 levels)	450	45	45	315	315
		Total	**14,772**	**1,480**	**1,480**	**10,360**	**10,360**
Lot 2a	Warehouse 2a	Warehouse	13,950	1,395	1,395	9,765	9,765
		Dock office	50	5	5	35	35
		Office (2 levels)	500	50	50	350	350
		Total	**14,500**	**1,450**	**1,450**	**10,150**	**10,150**
Lot 2b	Warehouse 2b	Warehouse	9,950	995	995	6,965	6,965
		Dock office	50	5	5	35	35
		Office (2 levels)	500	50	50	350	350
		Total	**10,500**	**1,050**	**1,050**	**7,350**	**7,350**
Lot 3	Warehouse 3	Warehouse	31,600	3,160	3,160	22,120	22,120
		Dock office	50	5	5	35	35
		Office (2 levels)	1000	100	100	700	700
		Total	**32650**	**3,265**	**3,265**	**22,855**	**22,855**
Lot 4	Warehouse 4a	Warehouse 4A	15515	1,555	1,555	10,885	10,885
		Dock office	50	5	5	35	35
		Office (2 levels)	700	70	70	490	490
		Total	**16265**	**1,630**	**1,630**	**11,410**	**11,410**
	Warehouse 4b	Warehouse 4A	15085	1,510	1,510	10,570	10,570
		Dock office	50	5	5	35	35
		Office (2 levels)	700	70	70	490	490
		Total	**15835**	**1,585**	**1,585**	**11,095**	**11,095**
Lot 5	Warehouse 5a	Warehouse 5A	7700	770	770	5,390	5,390
		Office (2 levels)	250	25	25	175	175
		Total	**7950**	**795**	**795**	**5,565**	**5,565**
	Warehouse 5b	Warehouse 5b	5175	520	520	3,640	3,640
		Office (2 levels)	250	25	25	175	175
		Total	**5425**	**545**	**545**	**3,815**	**3,815**
	Warehouse 5c	Warehouse 5c	5175	520	520	3,640	3,640
		Office (2 levels)	250	25	25	175	175
		Total	**5425**	**545**	**545**	**3,815**	**3,815**
	Warehouse 5d	Warehouse 5d	5090	510	510	3,570	3,570
		Office (2 levels)	250	25	25	175	175
		Total	**5340**	**535**	**535**	**3,745**	**3,745**
Lot 6	Warehouse 6	Warehouse	14000	1,400	1,400	9,800	9,800
		Dock office	50	5	5	35	35
		Office (2 levels)	500	50	50	350	350
		Total	**14550**	**1,455**	**1,455**	**10,185**	**10,185**
Café			600	600	400	4,200	2,800

Figure 33 Expected waste generation – operation

Source: SLR Consulting

Effective management of construction materials and construction and demolition waste, including options for reuse and recycling where applicable and practicable, will be conducted. Only wastes that cannot be cost effectively reused or recycled are to be sent to landfill or appropriate disposal facilities. Waste materials produced from demolition and construction activities are to be separated at the source and stored separately on-site. It is anticipated that the Project will provide enough space on-site for separate storage. If there is insufficient space on-site for full segregation of waste types, the Site Manager, or equivalent role, should consult with the waste and recycling collection contractor to confirm which waste types may be comingled prior to removal from the site.

During the operational phase of the proposed development, waste and recyclables storage units will be provided in the warehouse and office spaces. The units are to be collected at the end of each day and transferred by cleaners to the central waste storage room. Waste collection will be undertaken through a private contractor.

5.20 Ecologically Sustainable Development

A Sustainability Management Plan (SMP) of the proposed development has been prepared by SLR Consulting, and is attached to this report at **Appendix X**. The principal objective of the Sustainability Management Plan is to identify all potential energy savings that may be realised during the operational phase of the project, including a description of likely energy consumption levels and options for alternative energy sources such as PV solar power.

In summary, the SMP finds that following the implementation of all energy efficiency measures described within the report, the project is predicted to achieve a 35.5% greenhouse gas reduction compared with the 2019 NCC Reference Building. By installing 4-star rated toilets, urinals and taps, and the proposed rainwater harvesting facility the proposed development will reduce its potable water demand by approximately 37%.

Furthermore, the EP&A Regulation lists 4 principles of ecologically sustainable development to be considered in assessing a project. They are:

- The precautionary principle;
- Intergenerational equity;
- Conservation of biological diversity and ecological integrity; and
- Improved valuation and pricing of environmental resources.

An analysis of these principles follows.

5.20.1 Precautionary Principle

The precautionary principle is utilised when uncertainty exists about potential environmental impacts. It provides that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. The precautionary principle requires careful evaluation of potential environmental impacts in order to avoid, wherever practicable, serious or irreversible damage to the environment.

This EIS has not identified any serious threat of irreversible damage to the environment and therefore the precautionary principle is not relevant to the proposal.

5.20.2 Intergenerational Equity

Inter-generational equity is concerned with ensuring that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations. The proposal has been designed to benefit both the existing and future generations by:

- implementing safeguards and management measures to protect environmental values;
- facilitating job creation in close proximity to future residential areas; and
- ensuring the WSEA are maintained and enhanced into the future for use by future generations.

The proposal has integrated short and long-term social, financial and environmental considerations so that any foreseeable impacts are not left to be addressed by future generations. Issues with potential long term implications such as waste disposal would be avoided and/or minimised through construction planning and the application of safeguards and management measures described in this EIS and the appended technical reports.

5.20.3 Conservation of biological diversity and ecological integrity

The principle of biological diversity upholds that the conservation of biological diversity and ecological integrity should be a fundamental consideration.

The proposal is not considered to have a significant effect on the biological diversity and ecological integrity of the study area. This issue is further discussed in the Biodiversity Development Assessment Report (BDAR) prepared by Eco Logical and attached to this report at **Appendix N**, and **Section 5.12**.

5.20.4 Improved valuation, pricing, and incentive mechanisms

The principles of improved valuation and pricing of environmental resources requires consideration of all environmental resources which may be affected by a proposal, including air, water, land and living things. Mitigation measures for avoiding, reusing, recycling, and managing waste during construction and operation would be implemented to ensure resources are used responsibly in the first instance.

Additional measures will be implemented to ensure no environmental resources in the locality are adversely impacted during the construction or operational phases.

5.21 Building Code of Australia

An assessment of the proposed development's compliance with the relevant provisions of the Building Code of Australia (BCA) has been prepared by Mackenzie Group, and is attached to this report at **Appendix Y**. The statement confirms that the proposed development is compliant, or capable of compliance, with the relevant BCA provisions.

5.22 Development contributions

Section 29 of the WSEA SEPP relates to the provision of satisfactory arrangements or the provision of regional transport infrastructure and services. Satisfactory arrangements are proposed to be satisfied by way of works in kind (by way of a Voluntary Planning Agreement) for the upgrade of the Mamre Road / Abbott Road intersection upgrade (which will allow the intersection to accommodate the proposed development).

The applicant intends to further consult with DPIE on this matter. Discussions around preliminary design have commenced between the applicant, Transport for NSW and adjacent landowners (including Stockland/Fife undertaking the 200 Aldington Road project). The design of these works are largely predicated on traffic modelling for the Mamre Road precinct being completed, which is due to occur in March 2021.

It is also recognised that a Section 7.11 Development Contributions Plan for the Mamre Road Precinct has been drafted by Penrith City Council and placed on public exhibition. ESR have made a direct submission to Penrith City Council as well as through the Mamre Road Landowners Group and would look to finalise a Works in Kind arrangement once the contributions plan is finalised, following consultation.

5.23 Transition to rural

The eastern boundary of the site has been identified as 'Transition to rural' under the Mamre Road Structure Plan (refer to **Section 1.4.2** above), and hence must be compatible with the adjacent R5 Large Lot Residential zoning at Mount Vernon. The proposed development incorporates a number of design decisions aimed at minimising this visual impact, including through significant landscape planting at the eastern boundary and a reduction in the height of building pads to ensure reduced impacts to visual amenity. This can be highly effective in helping to reduce visual impacts for a number of sensitive close range properties. This will be most effective after 15 years and for those receptors who experience direct views at close to medium range. Mature landscape planting should help to effectively screen view corridors to many of the warehouse elements

5.24 Signage assessment

State Environmental Planning Policy No. 64 – Advertising and Signage (SEPP 64) applies to all signage that, under an environmental planning instrument, can be displayed with or without development consent and is visible from any public place or public reserve. The proposed signage meets the objectives of SEPP 64 in that it:

- Is scaled appropriately with regards to the proposed buildings and the broader site in which it is located;
- Is commensurate with the amenity and visual character of the area including the character of existing signage;
- Does not block any significant views and will not have an adverse impact on the amenity or future character of the surrounding area;
- Will effectively communicate the individual tenancies of the proposed warehousing facility; and
- Is of a high quality design and finish.

An assessment of the compliance of the proposed signage (refer to **Section 3.8** above) against the criteria as specified under Schedule 1 of SEPP 64 is detailed in **Table 9** below.

Table 9 Assessment criteria under Schedule 1 of SEPP 64

Assessment Criteria	Assessment	Compliance
Character of the Area		
Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located?	The proposed signage is consistent with the area's existing character. The signage is consistent with the objectives of SEPP WSEA as part of a permissible warehousing facility under the IN1 General Industry zoning of the site.	Yes
Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?	No specific outdoor advertising theme applies to the area or locality. The design of the signage is considered to be appropriate within its surrounding industrial context.	Yes
Special Areas		
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?	The proposed signage is located within the Mamre Road Industrial Precinct and therefore is not in proximity to any environmentally sensitive areas. As such, the signage does not detract from the visual quality of these areas.	Yes
Views and Vistas		
Does the proposal obscure or compromise important views?	The proposed signage does protrude above any building and will not dominate the skyline and/or reduce the quality of vistas.	Yes
Does the proposal dominate the skyline and reduce the quality of vistas?		
Does the proposal respect the viewing rights of other advertisers?	The proposed signage is of a scale that respects the viewing rights of, and does not obstruct, any other signage, being located inside the proposed facility.	Yes
Streetscape, Setting or Landscape		
Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?	The scale, proportion and form of the proposal is considered appropriate, and will respond to the overall size of the buildings and surrounding industrial streetscape.	Yes
Does the proposal contribute to the visual interest of the streetscape, setting or landscape?	The proposal will improve the visual interest of the setting and landscape through facilitating high quality signage that integrates with the architectural characteristics of the proposed buildings and allows for easy identification of the industrial estate of each of the proposed tenancies.	Yes
Does the proposal reduce clutter by rationalising and simplifying existing advertising?	No signage currently exists on the site.	Yes
Does the proposal screen unsightliness?	Although not specifically designed to screen unsightliness, the proposal will promote visual interest and allow for easy identification of the estate, improve wayfinding, and identification of the individual warehouse tenancies.	Yes
Does the proposal protrude above buildings, structures or tree canopies in the area or locality?	The proposed signage will not protrude above any building, structure and/or tree canopy.	Yes
Does the proposal require ongoing vegetation management?	The proposed signage does not require vegetation management.	Yes
Site and Building		
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?	The proposed signage has been carefully designed to be compatible with the scale, proportions, and presentation of the proposed buildings. The scale of the proposal is considered to be appropriate within the context of the site and will support the industrial character of the site.	Yes
Does the proposal respect important features of the site or building, or both?	The proposed signage is respectful in design and will not dominate the surrounding locality or detract from any of the important features of the building.	Yes

Assessment Criteria	Assessment	Compliance
Does the proposal show innovation and imagination in its relationship to the site or building, or both?	Innovation is not considered to be appropriate as the proposed signage is only intended to identify proposed warehousing tenancies. They are instead to be of a simplistic and visually consistent design.	Yes
Associated Devices and Logos with Advertisements and Advertising Structures		
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?	Not applicable to the proposed signage, which does not include any complex mechanical elements.	Yes
Illumination		
Would illumination result in unacceptable glare?	The proposed tenancy identification signs will not incorporate illumination.	Yes
Would illumination affect safety for pedestrians, vehicles or aircraft?		Yes
Would illumination detract from the amenity of any residence or other form of accommodation?		Yes
Can the intensity of the illumination be adjusted, if necessary?		Yes
Is the illumination subject to a curfew?		Yes
Safety		
Would the proposal reduce the safety for any public road?	The proposed signage is to be located entirely inside the site and will not impact the safety of any road users, including drivers, pedestrians, bicyclists, or result in the obstruction of any sightlines from public areas.	Yes
Would the proposal reduce the safety for pedestrians or bicyclists?		
Would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas?		
Would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas?		

5.25 Site suitability and public interest

The proposed development is considered to be suitable for the site. As noted above, being located in the WSEA, the site is suitable for the scale and land use mix proposed and will support the provision of jobs and contribute to the '30-minute City' by bringing more jobs to Western Sydney. It leverages off the site's strategic location within the Mamre Road Precinct to deliver significant warehousing and employment generating floorspace whilst minimising environmental impacts, and not comprising the amenity of surrounding land. The site benefits from proximity to existing road infrastructure, including significant freight corridors (the M4 and M7 motorways) as well as the future planned Western Sydney Freight Line and Outer Sydney Orbital.

The current site layout has been informed through an extensive development process that has considered site-specific opportunities and constraints (including access to Abbotts Road), flooding and ecology, need for earthworks, internal access arrangements and manoeuvrability, construction feasibility, staging, and landscaping/tree coverage implications, as well as operational costs and efficiencies.

Therefore, given these substantive public benefits, the proposed development is also considered to be in the public interest.

6.0 Environmental Risk Assessment

The Environmental Risk Assessment (ERA) establishes a residual risk by reviewing the significance of environmental impacts and the ability to manage those impacts. The ERA for the proposed SSDA has been adapted from Australian Standard AS4369.1999 Risk Management and Environmental Risk Tools.

In accordance with the SEARs, the ERA addresses the following significant risk issues:

- the adequacy of baseline data;
- the potential cumulative impacts arising from other developments in the vicinity of the Site; and
- measures to avoid, minimise, offset the predicted impacts where necessary involving the preparation of detailed contingency plans for managing any significant risk to the environment.

Figure 34 indicates the significance of environmental impacts and assigns a value between 1 and 10 based on:

- the receiving environment;
- the level of understanding of the type and extent of impacts; and
- the likely community response to the environmental consequence of the project;

The manageability of environmental impact is assigned a value between 1 and 5 based on:

- the complexity of mitigation measures;
- the known level of performance of the safeguards proposed; and
- the opportunity for adaptive management.

The sum of the values assigned provides an indicative ranking of potential residual impacts after the mitigation measures are implemented.

Significance of impact	Manageability of impact				
	5 Complex	4 Substantial	3 Elementary	2 Standard	1 Simple
1 – Low	6 (Medium)	5 (Low/Medium)	4 (Low/Medium)	3 (Low)	2 (Low)
2 – Minor	7 (High/Medium)	6 (Medium)	5 (Low/Medium)	4 (Low/Medium)	3 (Low)
3 – Moderate	8 (High/Medium)	7 (High/Medium)	6 (Medium)	5 (Low/Medium)	4 (Low/Medium)
4 – High	9 (High)	8 (High/Medium)	7 (High/Medium)	6 (Medium)	5 (Low/Medium)
5 – Extreme	10 (High)	9 (High)	8 (High/Medium)	7 (High/Medium)	6 (Medium)

Figure 34 Risk Assessment Matrix

Source: Ethos Urban

Table 10 Risk assessment matrix

Item	Phase	Potential environmental impact	Proposed mitigation measures	Significance of impact	Manageability of impact	Residual impact
Noise and Vibrations	C / O	• Increase in noise and vibrations levels during construction • Increase in noise levels during operation	• The proposed development will implement the recommendations of the Noise and Vibration Assessment prepared by RWDI (**Appendix L**) and will develop a detailed Construction Environmental Management Plan to provide measures to ameliorate any potential noise or vibration impacts to surrounding sensitive receivers. • Given that the surrounding area has been rezoned to support transition into an industrial precinct, any potential noise impacts to surrounding receivers are considered to be manageable in the context of the overall development.	C = 3 O = 2	C = 2 O = 2	C = 5 (low / medium) O = 4 (low / medium)
Traffic and Parking	C / O	• Increase in construction traffic on local roads • Increase in traffic and parking during operation	• A Construction Traffic Management Plan will be prepared to detail measures to minimise any adverse impacts arising from construction traffic • Additional parking demand generated by the proposed development will be accommodated within the site. Subject to various upgrades to surrounding roads, the proposed development is able to be accommodated on the road network.	C = 3 O = 3	C = 2 O = 3	C = 5 (low / medium) O = 6 (medium)
Visual and Built Form	O	• Visual impact of the development when viewed from adjoining properties and public areas	• Measures have been incorporated to reduce the visual impact of the development when viewed from nearby residential areas, especially Mount Vernon large lot residential landuses to the east of the site. • Given that the site and surrounding area has been rezoned to support an industrial precinct, any potential view impacts have been previously considered and assessed.	O = 2	O = 1	O = 3 (low / medium)
Air and Water Quality	C / O	• Potential for reduced air and water quality during construction and operation of the industrial activities	• A detailed Construction Management Plan will be developed once a contractor has been appointed to implement appropriate measures and ensure that air and water quality is maintained. • Implement mitigation measures and recommendations of the Air Quality Assessment prepared by RWDI (**Appendix V**).	C = 3 O = 2	C = 2 O = 2	C = 5 (low / medium) O = 4 (low / medium)
Sediment, erosion and dust	C	• Dust produced from construction • Erosion produced from construction	• The proposed development will be undertaken in accordance with the Civil Infrastructure Report and Plans prepared by AT&L (**Appendix I**) and the appropriate mitigation measures for managing sediment, erosion, and dust.	C = 2	C = 3	C = 5 (low/medium)

Item	Phase	Potential environmental impact	Proposed mitigation measures	Significance of impact	Manageability of impact	Residual impact
Flooding	O	• Potential flood impacts to the proposed development	• The proposed development has been designed to include an OSD retention basin, resulting in an improved outcome from that which currently exists. The site is generally not affected by flooding impacts, including 1-in-100 year ARI flood events and the Probable Maximum Flood from South Creek (**Section 2.3.4**).	O = 1	O = 1	O = 2 (low)
Heritage	C / O	• Potential physical and visual impacts on heritage items • Potential impacts to archaeology and artefacts	• The proposed development will be undertaken in accordance with the Heritage Impact Assessment prepared by Urbis (**Appendix O**) and the Aboriginal Cultural Heritage Assessment (**Appendix P**) prepared by Urbis, and the appropriate mitigation measures for managing historical, Aboriginal and archaeological heritage during both the construction and operation phases.	C = 3 O = 2	C = 2 O = 2	C = 5 (low/medium) O = 4 (low/medium)
Ecology	C / O	• Impact on flora and fauna during construction and operation • Tree removal and construction impacts on tree health	• A Construction Environmental Management Plan (CEMP) will be prepared prior to the commencement of any construction works. • A Vegetation Management Plan (VMP) will be prepared to include measures to establish the maintenance of the vegetation management area. • Implement mitigation measures and recommendations of the Biodiversity Development Assessment Report prepared by Eco Logical (**Appendix N**).	C = 3 O = 2	C = 3 O = 2	C = 6 (medium) O = 4 (low/medium)

7.0 Mitigation measures

The collective measures required to mitigate the impacts associated with the proposed works are detailed in **Table 11** below. These measures have been derived from the previous assessment of environmental impacts in **Section 5**, and those detailed in appended consultants' reports.

Table 11 Mitigation measures

List of mitigation measures
Construction hours Construction, including the delivery of materials to and from the site, may only be carried out between the following hours: • Monday to Friday: 7:00 to 18:00; • Saturday: 8:00 to 13:00; and • No work on Sundays or public holidays.
Construction impacts A Construction Environmental Management Plan (CEMP) will be prepared by the appointed contractor prior to the commencement of works. The CEMP will establish site management principles.
Sedimentation and erosion control The development is to follow the Soil and Water Management Plan, site inspection and maintenace requirements, and sediment basin maintenance measures outlined in Section 6 of the Civil Infrastructure Report and Plans prepared by AT&L at **Appendix I**.
Stormwater management The development is to follow the stormwater recommendations outlined in Section 9.3 of the Civil Infrastructure Report and Plans prepared by AT&L at **Appendix I**.
Noise management The development is to follow the construction noise and vibration mitigation measures outlined in Section 7.6 of the Noise and Vibration Assessment prepared by RWDI at **Appendix L**.
Biodiversity impacts The development is to follow the measures proposed to mitigate and manage biodiversity impacts oulined in Section 2.2.5 of the Biodiversity Development Assessment Report prepared by Eco Logical at **Appendix N**.
Site contamination and geotechnical assessment The development is to follow the recommendations given in Section 9 of the Preliminary Environmental Site Investigation prepared by Douglas Partners at **Appendix R**, and recommendations for further investigation provided in Section 7 of the Geotechnical Investigation Report prepared by Alliance Geotechnical at **Appendix T**.
Bushfire impacts The development shall comply with the bushfire management strategies identified in Section 5 of the Bushfire Protection Assessment prepared by Australian Bushfire Protection Planners at **Appendix U**.
Air quality impacts The development shall comply with the recommended mitigation and management measures for air quality provided in Section 8 of the Air Quality Assessment prepared by RWDI at **Appendix V**.
Waste management The development should implement where possible the operational waste management strategies and recommendations provided in Section 6 of the Waste Management Plan prepared by SLR Consulting at **Appendix W**.
Ecologically Sustainable Development The development shall be consistent with the sustainabiltiy measures commitments outlined in Section 5, and monitoring and reporting measures outlined in Section 7, of the Sustainability Management Plan prepared by SLR Consulting at **Appendix X**.

8.0 Conclusion

This Environmental Impact Statement (EIS) has been prepared to consider the environmental, social, and economic impacts of the proposed development. The EIS has addressed the issues outlined in the SEARs (**Appendix C**) and accords with Schedule 2 of the EP&A Regulation.

The proposal seeks to facilitate the redevelopment of the site for a new industrial estate, known as Westlink, in accordance with the site's recent rezoning (June 2020 to the *State Environmental Planning Policy (Western Sydney Employment Area) 2009*) for industrial purposes, and desired future outcome established by the Mamre Road Precinct Structure Plan.

The EIS has considered and assessed a range of environmental issues including permissibility, infrastructure requirements, visual impact, traffic and transport impact, the road network, soil and water impacts, noise and vibration, hazard and risk, biodiversity impact, heritage impact, Aboriginal heritage impact, social and economic impact, contamination and geotechnical considerations, bushfire impact, air quality, waste management, Ecologically Sustainable Development, Building Code of Australia, and signage impacts.

Having regard to environmental, economic, and social considerations, including the principles of ecologically sustainable development, the carrying out of the project is justified for the following reasons:

- The proposal is permissible with consent and meets the relevant statutory requirements of the relevant environmental planning instruments, including *State Environmental Planning Policy (Western Sydney Employment Area) 2009*;
- The proposal is consistent with the desired future character of the area and relevant strategic planning documentation, including the Greater Sydney Region Plan and Mamre Road Structure Plan;
- The proposal will not result in adverse environmental impacts, will contribute much-needed industrial land in Western Sydney, and will provide significant employment outcomes during both construction and operation; and
- The proposal is suitable for the site and in the public interest.

Overall, the proposal will facilitate employment development at a suitable scale and will assist in repurposing a strategically significant site within the Western Sydney Employment Area that is in line with the strategic direction for the area as established by the NSW Government. This will further safeguard the future of employment lands and assist in achieving the employment forecasts for Western Sydney. On this basis and given the merits of the proposal, we have no hesitation in recommending the proposal be approved.