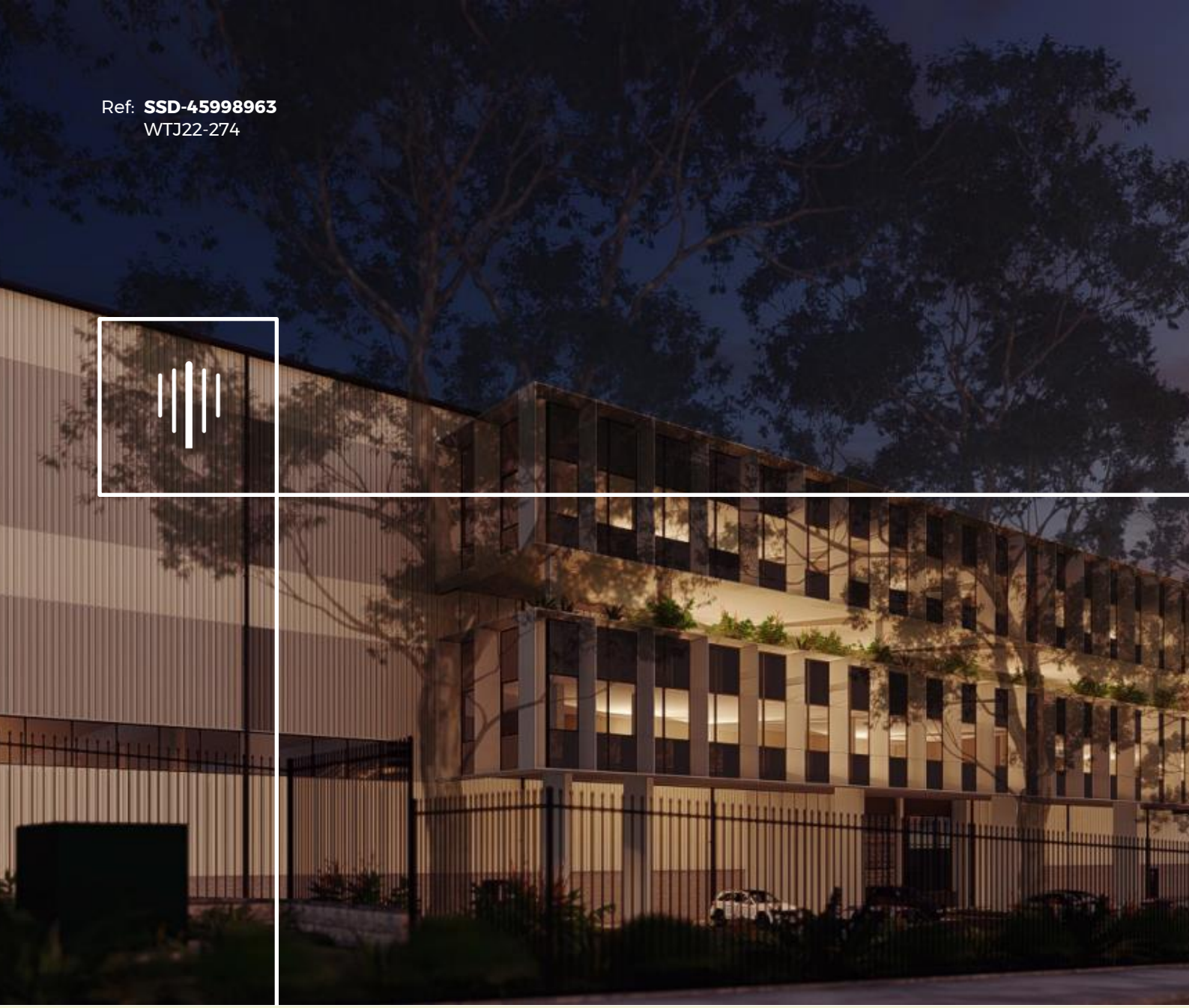
Ref: **SSD-45998963**
WTJ22-274



WILLOWTREE PLANNING

ENVIRONMENTAL IMPACT STATEMENT:
HORSLEY ROAD MULTI-LEVEL WAREHOUSE, MILPERRA

339 AND 349 HORSLEY ROAD, MILPERRA
Lot 140 DP 550194 and Lot 141 DP 550194

—

Prepared by Willowtree Planning Pty Ltd
on behalf of Hale Capital Development Management Pty Ltd

20 October 2022

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WILLOWTREE
PLANNING

In the spirit of reconciliation and recognition, Willowtree Planning acknowledges the Traditional Owners of this Country throughout Australia and their continuing and ongoing connections to land, waters and community. We show our respect to Elders – past and present. We acknowledge that we stand on this Country which was and always will be recognised as Aboriginal Land. We acknowledge the Traditional Owners of the Lands in this Local Government Area, belonging to the local Aboriginal People, where this proposal is located upon.

DOCUMENT CONTROL TABLE			
Document Reference:	SSD-45998963_Environmental Impact Statement		
Contact:	Eleisha Burton		
Version and Date	Prepared by	Checked by	Approved by
Version No. 0 – DRAFT (19/09/2022)	Eleisha Burton Senior Associate	Andrew Cowan Director	Andrew Cowan Director
Version No. 1 (20/10/2022)	Eleisha Burton Senior Associate	Andrew Cowan Director	Andrew Cowan Director

EIS DECLERATION

Declaration Form: Submission of EIS	
Project Details	
Project name	Horsley Road Multi-level Warehouse, Milperra
Application number	SSD-45998963
Address of the land on which the development is to be carried out	339-349 Horsley Road, Milperra NSW 2214 (Lot 140 DP 550194 and Lot 141 DP 550194)
Proponent Details	
Proponent name	Hale Capital Development Management Pty Ltd
Proponent address	Suite 605, 2 Queen Street, Melbourne VIC 3000
Details of person by whom this EIS was prepared	
Name	Eleisha Burton Senior Associate Willowtree Planning Pty Ltd
Address	Level 10, 56 Berry Street North Sydney, NSW 2060
Professional qualifications	Bachelor of Planning, Graduate Diploma of Environmental Management
Declaration by registered environmental assessment practitioner	
Name	Eleisha Burton
Registration number	42205
Organisation registered with	Planning Institute of Australia
Declaration	The undersigned declares that this EIS: ▪ has been prepared in accordance with Part 8 of the *Environmental Planning and Assessment Regulation 2021*; ▪ contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates; ▪ does not contain information that is false or misleading; ▪ addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project; ▪ identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments; ▪ has been prepared having regard to the Department's *State Significant Development Guidelines - Preparing an Environmental Impact Statement*; ▪ contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development; ▪ contains a consolidated description of the project in a single chapter of the EIS; ▪ contains an accurate summary of the findings of any community engagement; and ▪ contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.
Signature	
Date	20 October 2022

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GLOSSARY OF KEY TERMS

TERM	MEANING
AHD	Australian Height Datum
BAM	Biodiversity Assessment Methodology
BCA	Building Code of Australia
BC Act	*Biodiversity Conservation Act 2016*
BCBHS	Building Code and Bushfire Hazard Solutions
BC Regulation	*Biodiversity Conservation Regulation 2017*
BDAR	Biodiversity Development Assessment Report
BLEP2015	*Bankstown Local Environmental Plan 2015*
BOS	Biodiversity Offset Scheme
CBD	Central Business District
CEMP	Construction Environmental Management Plan
CIV	Capital investment value
Council	Canterbury-Bankstown Council
CTMP	Construction Traffic Management Plan
DA	Development Application
DCP	Development Control Plan
DP	Deposited Plan
DPE	Department of Planning and Environment
EES	Environment, Energy and Science Group
EIS	Environmental Impact Statement
EP&A Act	*Environmental Planning and Assessment Act 1979*
EP&A Regulation	*Environmental Planning and Assessment Regulation 2021*
EPA	Environment Protection Authority
EPBC Act	*Commonwealth Environment Protection and Biodiversity Conservation Act 1999*
EPI	Environmental Planning Instrument
EPL	Environmental Protection Licence
ESD	Ecologically Sustainable Development
FRNSW	Fire and Rescue NSW
FSR	Floor Space Ratio (as per the *Standard Instrument—Principal Local Environmental Plan*)
GFA	Gross Floor Area (as per the *Standard Instrument—Principal Local Environmental Plan*)
GHG	Greenhouse Gas
GSC	Greater Sydney Commission
LGA	Local Government Area
MNES	Matter of National Environmental Significance
MUSIC	Model for Urban Stormwater Improvement Conceptualisation
NCC	National Construction Code
NOR	Notice of Requirements
NSW RMS	NSW Roads and Maritime Services
NSW OEH	NSW Office of Environment and Heritage
POEO Act	*Protection of the Environment Operations Act 1997*

RL	Reduced level
SEARs	Secretary's Environmental Assessment Requirements (SSD-45998963), dated 12 July 2022
SEPP	State Environmental Planning Policy
SIDRA	Signalised & unsignalised Intersection Design and Research Aid
Sqm or m²	Square metres
Subject site/site/study area	339 and 349 Horsley Road, Milperra, or Lot 140 DP 550194 and Lot 141 DP 550194
TfNSW	Transport for NSW
VIA	Visual Impact Assessment
VPA	Voluntary Planning Agreement
Willowtree Planning	Willowtree Planning Pty Ltd
WM Act	*Water Management Act 2000*
WMP	Waste Management Plan
WSUD	Water Sensitive Urban Design

SUMMARY

This Environmental Impact Statement (EIS) has been prepared by Willowtree Planning Pty Ltd (Willowtree Planning), on behalf of Hale Capital Development Management Pty Ltd. The EIS is submitted to the New South Wales (NSW) Department of Planning and Environment (DPE), in support of an application for State Significant Development (SSD), for the construction and operation of a warehouse and distribution centre, including site preparation works and the provision of infrastructure at 339 and 349 Horsley Road, Milperra (Lot 140 DP 550194 and Lot 141 DP 550194) as described in **PART 3** of this EIS.

In short, the proposal involves the construction and operation of a warehouse and distribution centre (identified as the Horsley Road Multi-level Warehouse, Milperra), comprising:

- Demolition and removal of all existing buildings and structures;
- Site preparation works, including the removal of 70 trees;
- Earthworks, to achieve a finished floor level (FFL) of RL 11.05;
- Provision of infrastructure;
- Lot amalgamation;
- Three (3) vehicular crossovers to Horsley Road;
- Construction of two (2) warehouse buildings, split over two (2) storeys, with ancillary office offerings;
- On-site car parking;
- Complementary landscaping and planting to offset tree removal;
- Business identification signage zones; and
- Allowance for operations up to 24 hours per day, seven (7) days per week.

The proposed development is to be located at 339 and 349 Horsley Road, Milperra, more formally described as Lot 140 DP 550194 and Lot 141 DP 550194. Such land is described throughout this EIS as the 'subject site'.

The subject site is located within the Canterbury-Bankstown Local Government Area (LGA) and is zoned IN1 General Industrial, pursuant to the *Bankstown Local Environmental Plan 2015* (BLEP2015). The proposed development falls within the definition of 'warehouse or distribution centre', which is permissible with consent in the IN1 General Industrial zone of the BLEP2015.

The proposal satisfies the definition of SSD pursuant to:

- Schedule 1, Clause 12 of *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP), being development for "the purpose of warehouse or distribution centres (including container storage facilities) at one location and related to the same operation" with a capital investment value (CIV) of more than $30 million.

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

Under the *Environmental Planning & Assessment Act 1979* (EP&A Act), it is required that a request for SEARs must be made prior to the lodgement of any application for SSD. SEARs were requested for the proposed development (reference: SSD-45998963) and later issued by the NSW DPE on 12 July 2022 (refer to **Appendix 1**) in the form of industry-specific SEARs, through the Rapid Assessment Framework.

The SEARs for the proposal outline several Key Issues to be addressed as part of this EIS, including:

1. Statutory Context
2. Capital Investment Value and Employment

3. Design Quality
4. Built Form and Urban Design
5. Visual Impact
6. Traffic, Transport and Accessibility
7. Trees and Landscaping
8. Ecologically Sustainable Development (ESD)
9. Biodiversity
10. Air Quality
11. Noise and Vibration
12. Ground and Water Conditions
13. Stormwater and Wastewater
14. Flooding Risk
15. Hazards and Risks
16. Contamination and Remediation
17. Waste Management
18. Aboriginal Cultural Heritage
19. Environmental Heritage
20. Social Impact
21. Infrastructure Requirements and Utilities
22. Bush Fire Risk
23. Construction, Operation and Staging
24. Contributions and Public Benefit
25. Engagement

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

Further, the proposed warehouse and distribution centre would be consistent with the objectives of BLEP2015 and relevant IN1 General Industrial zone. The proposal is suitable for the local context and shall not result in any significant environmental impact. As such, it is recommended that the proposal be supported by the NSW DPE for approval, subject to reasonable and relevant conditions.

SITE CONTEXT

The subject site is legally described as Lot 140 DP 550194 and Lot 141 DP 550194, with frontage to Horsley Road. The subject site has a total area of approximately 3.377 hectares and positioned within Canterbury-Bankstown LGA.

The subject site comprises two (2) allotments located on the western side of Horsley Road. The subject site is zoned IN1 General Industrial pursuant to BLEP2015, which is intended to:

- provide a wide range of industrial and warehouse land uses.
- encourage employment opportunities.
- minimise any adverse effect of industry on other land uses.
- support and protect industrial land for industrial uses.

Existing attributes of the subject site are noted as follows:

- The subject site exhibits an area of 3.377ha and is located in the suburb of Milperra.
- The subject site affords a primary frontage of 172.5m to Horsley Road to the east.
- Vehicular access to the subject site is facilitated via existing access points on Horsley Road.
- In its existing state, the subject site comprises a one-storey factory building and a brick office building at 339 Horsley Road and two (2) one-storey warehouse buildings and a one-storey rendered office with at-grade parking and concrete driveway.

- The subject site is within the existing Milperra industrial precinct, predominantly characterised by established industrial development of similar scale.
- The subject site is located in proximity to the Western Sydney University to the south, Bankstown Airport to the north and the Bankstown Golf Club to the west.
- The subject site is serviced by road infrastructure including Horsley Road, Milperra Road and the M5 South Western Motorway.

The existing site context is shown in **Figure 1** and **Figure 2** below.

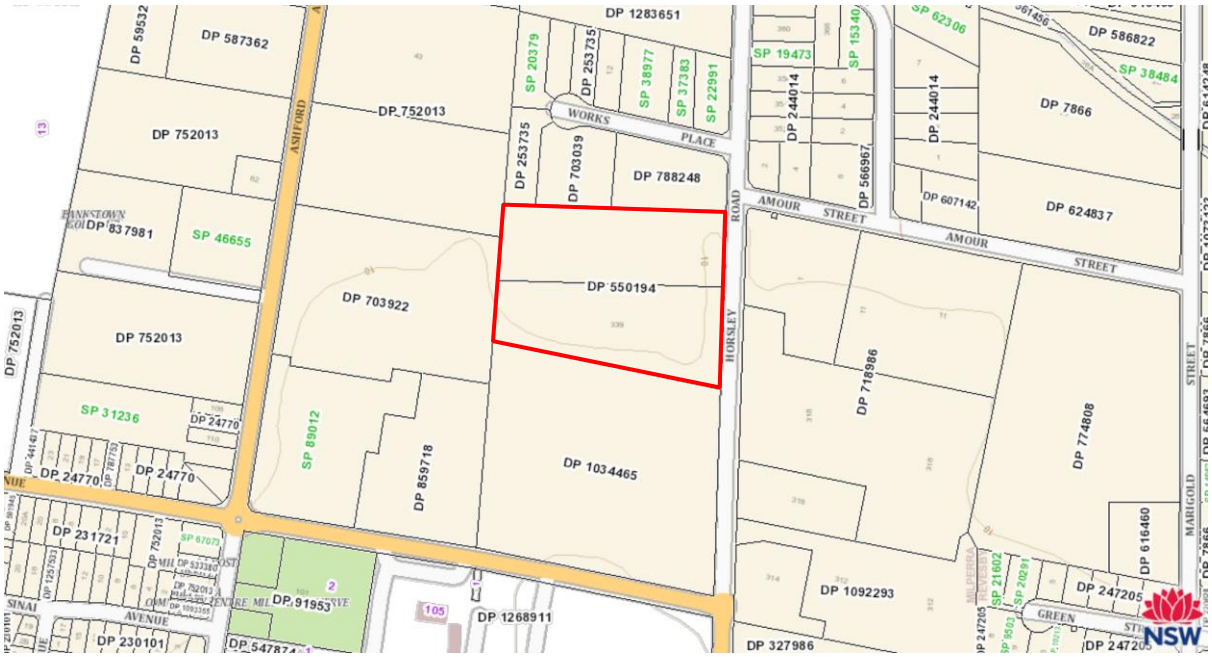


Figure 1 **Cadastral Map (Source: SIX Maps, 2022)**

Figure 2 **Aerial Map (Source: Nearmap, 2022)**

The wider site context is depicted in **Figure 3** below.

For further details on the current site context, reference should be to **PART 2** of this EIS.

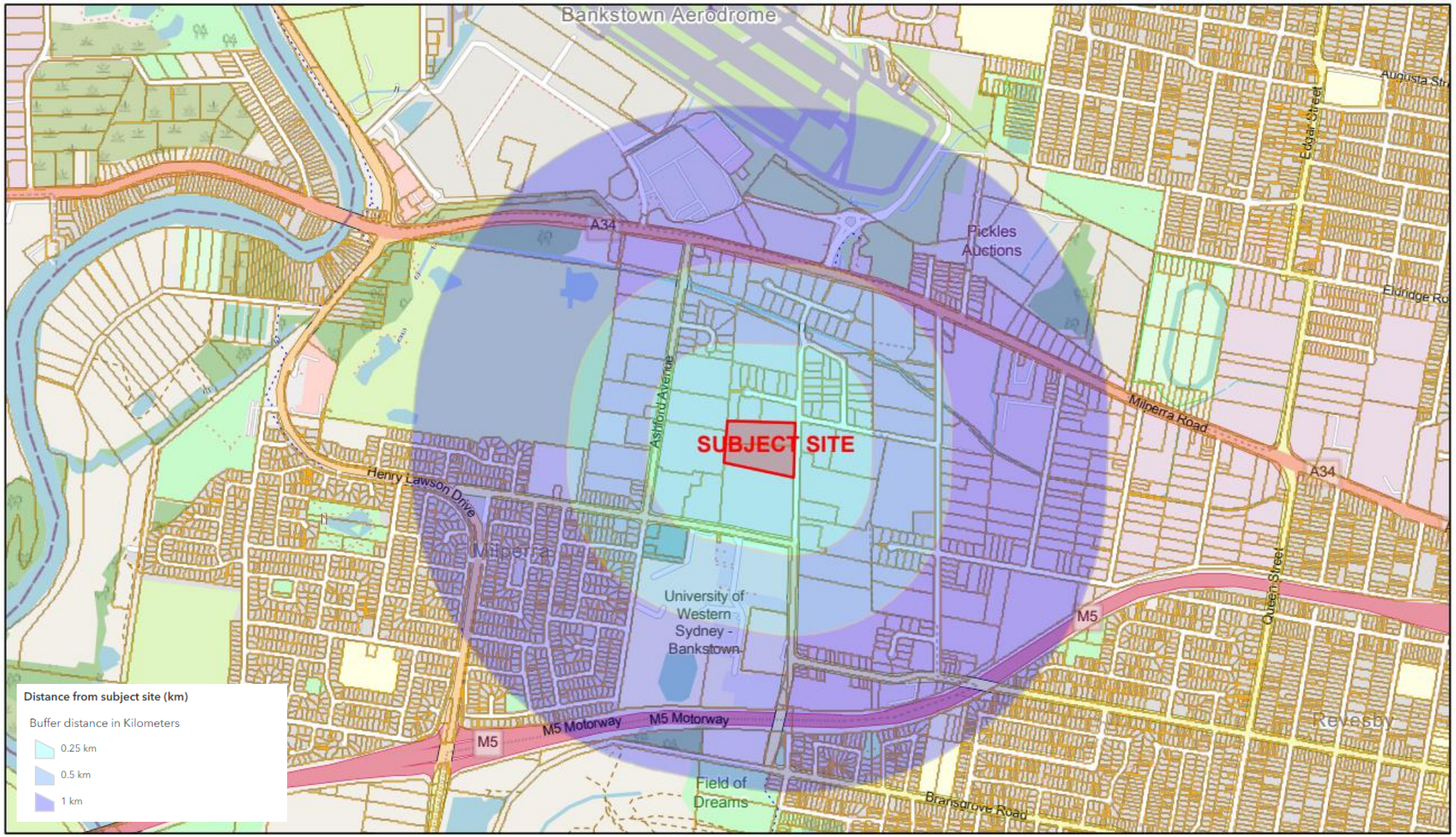


Figure 3 Site Context Map (Source: Willowtree Planning, 2022)

PROJECT DESCRIPTION

The proposal represents a redevelopment of the subject site for a new warehouse and distribution centre.

The development consent sought under this proposal for a warehouse and distribution centre, comprises the following aspects of development:

- Demolition and removal of all existing buildings and structures;
- Site preparation works, including the removal of 70 trees;
- Earthworks to achieve an FFL of RL 11.05 (±500mm);
- Provision of infrastructure;
- Lot amalgamation;
- Three (3) vehicular crossovers to Horsley Road;
- Construction of two (2) warehouse buildings, split over two (2) storeys, with ancillary office offerings;
- On-site car and bicycle parking;
- Complementary landscaping and planting to offset tree removal;
- Business identification signage zones; and
- Allowance for operations up to 24 hours per day, seven (7) days per week.

PLANNING AND LEGISLATIVE FRAMEWORK

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

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

Refer to **PART 4** of this EIS.

PUBLIC NOTIFICATION AND CONSULTATION

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

- Canterbury-Bankstown City Council
- Gandangara Local Aboriginal Land Council
- Heritage NSW
- NSW DPE
- NSW Environment Protection Authority (EPA)
- NSW Fire and Rescue
- Transport for NSW (TfNSW)
- Ausgrid
- Sydney Water
- Telstra
- NBNCo
- Bankstown Aerodrome (Sydney Metro Airports)
- Surrounding local landowners, business and stakeholders

A large number of stakeholders residing or operating near the subject site were provided with information and an opportunity to comment on the proposed development, however did not take up the opportunity. This suggests limited interest or objection to the proposed development, reflecting the suitability of the site for the proposed development.

The consultation process is detailed in **PART E** and **Appendix 28**.

ENVIRONMENTAL IMPACT ASSESSMENT

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

The proposed development is considered acceptable in a legislative sense.

Based on the specialist studies and extensive investigations carried out for the proposed development, the following conclusions are made:

- The proposal is entirely consistent with the Objects of the EP&A Act. The appropriateness of the proposed development is also demonstrated through compliance with the BLEP2015, in that it achieves the employment generating outcomes envisaged for the subject site, with minimal impact on surrounding uses and environments.
- The proposed development would provide new employment opportunities through the provision of a warehouse and distribution centre to dated and underutilised industrial land holding.
- The proposal responds to the seven (7) objectives for good design in *Better Placed*.
- As clearly demonstrated in the various design plans and reports, the proposed development provides a suitable urban design outcome that reflects the existing locality and is complimentary to the strategic intent for the Milperra industrial area.
- The proposal maintains and offers tall native canopy trees, screening shrubs and groundcovers. Following maturity, these planted buffers will provide a dense screen to help to soften and screen the development.
- The proposal clearly demonstrates the site's commitment to ESD principles throughout the design, construction, and operation. Additionally, the project design team has worked to optimise the sites energy performance, address key climate related risks posed to the site, and align to the NSW Government's commitment to carbon neutrality by 2050.

JUSTIFICATION FOR THE PROPOSED DEVELOPMENT

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

EIS FINDINGS

The findings of this EIS demonstrate that the proposed development can proceed with consent. All assessed impacts have been examined and deemed acceptable, in relation to all the relevant legislative requirements applicable to the subject site. Furthermore, the proposed warehouse and distribution centre aligns with the objectives of the *A Metropolis of Three Cities – Greater Sydney Region Plan,* the *South District Plan* and the BLEP2015.

Based on the findings of this EIS, the subject site can successfully support the proposed warehouse and distribution centre, inclusive of related development and operations, with acceptable environmental impacts. The proposed development is a much-need redevelopment of a dated industrial site, with key strategic ties outlined in the *South District Plan*.

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

Based on the findings of this EIS, it is concluded that the proposed development would support the continued and targeted growth of the Milperra industrial area. The proposal would contribute to the retention and growth of the Milperra industrial precinct. The proposed development is therefore considered suitable from both a local and regional context and is considered orderly and appropriate, based on social, cultural, economic and environmental matters.

Given the above reasons and the satisfaction of both of the Objects of the EP&A Act and the aims of BLEP2015, it is recommended that the proposed development, for the purposes of a warehouse and distribution centre, be supported subject to relevant and reasonable conditions.

PART 1 INTRODUCTION

1.1 INTRODUCTION

This EIS has been prepared by Willowtree Planning, on behalf of Hale Capital Development Management Pty Ltd. The EIS is submitted to the NSW DPE, in support of an application for SSD, for the Horsley Road Multi-level Warehouse, Milperra (SSD-45998963) project, involving the construction and operation of a warehouse and distribution centre, including site preparation works and the provision of infrastructure at 339 and 349 Horsley Road, Milperra, more formally described as Lot 140 DP 550194 and Lot 141 DP 550194.

The proposal also seeks development consent for the construction and operation of a multi-level logistics facility, comprising two (2) warehouse and distribution centre buildings, with the full project description details outlined in **PART 3** of this EIS.

The general particulars of this proposal are summarised below:

- Demolition and removal of all existing buildings and structures;
- Site preparation works, including the removal of 70 trees;
- Earthworks, to achieve an FFL of RL 11.05 (±500mm);
- Provision of site infrastructure;
- Lot amalgamation;
- Three (3) vehicular crossovers to Horsley Road;
- Construction of two (2) warehouse buildings, split over two (2) storeys, with ancillary office offerings, comprising a total gross floor area of up to 32,799m^2;
- On-site car and bicycle parking;
- Complementary landscaping and planting to offset tree removal;
- Business identification signage zones; and
- Allowance for operations up to 24 hours per day, seven (7) days per week.

The proposal has a total CIV of $90,017,131.00 and would generate approximately 291.2 construction jobs and a total of approximately 457 – 566 operational jobs for the proposed facility, as calculated in **Section 1.6** of this EIS.

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

The structure of this EIS has been prepared in accordance with the NSW DPE's *State Significant Development Guidelines – Preparing an Environmental Impact Statement* as follows:

- **PART 1 INTRODUCTION**
- **PART 2 STRATEGIC CONTEXT**
- **PART 3 PROJECT DESCRIPTION**
- **PART 4 STATUTORY CONTEXT**
- **PART 5 ENGAGEMENT**
- **PART 6 ASSSESSMENT OF IMPACTS**
- **PART 7 PROJECT JUSTIFICATION**

1.2 STATUTORY REQUIREMENTS

The relevant statutory requirements of the proposal are suitably addressed in **Section 4.1.1** of this EIS.

1.3 MANDORY CONSIDERATIONS

Mandatory matters for consideration by the consent authority are outlined in **Appendix C** of this EIS.

1.4 SUPPORTING PROJECT DOCUMENTATION

Documents provided in support of the proposal are outlined in **TABLE 1**.

TABLE 1: DOCUMENT SCHEDULE

Appendix No.	Document Title	Consultant
Appendix 1	SEARs	-
Appendix 2	Cost Summary Report	Rider Levett Bucknall
Appendix 3	Title Documents	Various
Appendix 4	Architectural Drawings	SBA Architects
Appendix 5	Design Report	SBA Architects
Appendix 6	Detail Survey Plan	Land Partners
Appendix 7	Regulatory Compliance Report	Certatude
Appendix 8	Accessibility Report	ABE Consulting
Appendix 9	Visual Impact Analysis	Habit8 Landscape Architecture & Urbanism
Appendix 10	Transport and Accessibility Impact Assessment (and sub plans)	Colston Budd Rogers & Kafes
Appendix 11	Landscape Plan	Habit8 Landscape Architecture & Urbanism
Appendix 12	Arboricultural Impact Assessment	Canopy Consulting
Appendix 13	Ecologically Sustainable Development and Greenhouse Gas Assessment	Northrop Consulting
Appendix 14	Biodiversity Development Assessment Report	écologique Environmental Consulting
Appendix 15	Air Quality Impact Assessment	RWDI
Appendix 16	Noise and Vibration Impact Assessment	RWDI
Appendix 17	Geotechnical Assessment	PSM
Appendix 18	Acid Sulfate Soils Management Plan	JBS&G
Appendix 19	Civil Engineering Report	Costin Roe Consulting
Appendix 20	Detailed Site Investigation	JBS&G Australia
Appendix 21	Remedial Action Plan	JBS&G Australia
Appendix 22	Waste Management Plan	JBS&G Australia
Appendix 23	Hazardous Materials Survey	JBS&G Australia
Appendix 24	Aboriginal Cultural Heritage Assessment Report	Austral Archaeology
Appendix 25	Statement of Heritage Impact	Austral Archaeology
Appendix 26	Social Impact Assessment	HillPDA
Appendix 27	Service Infrastructure Assessment	Land Partners
Appendix 28	Stakeholder Engagement Report	HillPDA

Appendix 29	Bankstown Development Control Plan Assessment	Willowtree Planning
Appendix 30	Schedule 5 – Industry and Employment SEPP Assessment	Willowtree Planning
Whole document	Environmental Impact Statement	Willowtree Planning

This EIS has been prepared through careful consideration of the abovementioned documents; however, whilst Willowtree Planning has made all reasonable judgements considered necessary in preparing this EIS, it is not responsible for any inaccuracies of information contained within the appended documents listed in **TABLE 1** (or as summarised in the EIS).

1.5 CAPITAL INVESTMENT VALUE

The CIV of the proposed development, in accordance with the CIV definition under the *Environmental Planning & Assessment Regulation 2021* (EP&A Regulation), is estimated to be $90,017,131.00.

A Quantity Surveyors (QS) Cost Summary Report, prepared by Rider Levett Bucknall, is included in **Appendix 2**.

1.6 EMPLOYMENT NUMBERS

The following employment numbers are estimated for the proposal.

1.6.1 Construction Jobs

As documented in the QS Cost Summary Report (**Appendix 2**), the employment output represents that for each $1,000,000 of construction work done, the initial employment effect would be that 2.3 workers would be engaged to undertake the works on site, 0.7 workers would be employed in the manufacture and supply of intermediate goods and services used in the construction of the project and a further 0.3 workers would be employed through the indirect supply of goods and services to those companies supplying the construction companies involved.

As noted within QS Cost Summary Report, the entire project has a forecasted perceived employment contribution throughout the community of 291.2 job years during the life of the project.

1.6.2 Operational Jobs

An analysis of employment generate for the operation of the proposed development has been undertaken as part of the QS Cost Summary Report (**Appendix 2**). As the end users are not identified, the analysis has been forecast based on two (2) options:

- Conventional warehouse; and
- Semi-automated warehouse.

The employment output represents that for each 186m^2 of a 'conventional warehouse', one (1) year of employment is created. In a 'semi-automated warehouse' this reduces the employment to one (1) year of employment per 239m^2. In a conventional warehouse office, one (1) year of employment is created per 14m^2 of office and amenities space, whereas with same areas of a semi-automated warehouse the employment in increased to one (1) year of employment per 17m^2.

As noted within the QS Cost Summary Report, the entire project has a forecast perceived employment contribution throughout the community of 566 jobs per year as a conventional warehouse or 457 as a semi-automated warehouse.

The forecast outcomes are derived from established methodological approaches and measures. As the analysis involves forecasting, it can be affected by a number of unforeseeable variables. It represents, for the party to whom it is addressed, the best estimates of Rider Levett Bucknall, but no assurance is, or can be, given that the forecast outcomes will be achieved.

1.7 THE PROPONENT

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

TABLE 2: PROPONENT CONTACT DETAILS	
Company Details	Hale Capital Development Management Pty Ltd (ABN. 89 655 366 322)
Contact Name	Dominic Sester
Position	Development Manager
Contact Number	0488 909 011
Email Address	dominic.sester@halecp.com

1.8 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

An application requesting industry-specific SEARs was submitted to the NSW DPE (reference: SSD-45998963). The SEARs were subsequently issued by NSW DPE on the 12 July 2022 and are addressed by this EIS.

For reference, the industry-specific SEARs, as issued, are annexed in **Appendix 1** of this EIS. An overview of how the SEARs have been satisfied are outlined in **Appendix A**.

PART F of this EIS provides a detailed environmental risk assessment of all SEARs items.

This EIS is also consistent with the minimum requirements for an EIS, as set out in Division 5 of the EP&A Regulation and is aligned with the *State Significant Development Guidelines – Preparing an Environmental Impact Statement*.

PART 2 STRATEGIC CONTEXT

2.1 SITE LOCATION & CHARACTERISTICS

2.1.1 Site Characteristics

The subject site, as documented in this EIS, includes:

TABLE 3: SITE DETAILS		
Address	**Lot/DP**	**Lot Area**
339 Horsley Road, Milperra	Lot 140 DP 550194	1.758 hectares
349 Horsley Road, Milperra	Lot 141 DP 550194	1.619 hectares

The subject site comprises a total area of approximately 3.377 hectares, based on the Detail Survey prepared by Land Partners (**Appendix 6**), comprising two (2) allotments located on the western side of Horsley Road. Existing attributes of the subject site are noted as follows:

- The subject site affords a primary frontage of 172.5m to Horsley Road to the east.
- Vehicular access to the subject site is facilitated via existing access points on Horsley Road.
- In its existing state, the subject site comprises a one-storey factory building and a brick office building at 339 Horsley Road and two (2) one-storey warehouse buildings and a one-storey rendered office with at-grade parking and concrete driveway.
- The subject site is within the existing Milperra industrial precinct, predominantly characterised by established industrial development of similar scale.
- The subject site is located in proximity to the Western Sydney University to the south, Bankstown Airport to the north and the Bankstown Golf Club to the west.
- The subject site is serviced by road infrastructure including Horsley Road, Milperra Road and the M5 South Western Motorway.

The immediate site context is shown in **Figure 1** and **Figure 2** of this EIS.

The subject site has historically been utilised for agricultural and industrial land uses, including market gardens, storage of freight and steel manufacturing. An overview of the site characteristics are included in **TABLE 4**, as follows.

TABLE 4: SITE CHARACTERISTICS		
Component	**Description**	
Topography and Geology	The site is underlain by Wianamatta group shale (Penrith 1:100 000) with a topographic slope ranging from approximately 15 to 10m AHD (Bankstown topographic map). The site slopes in a general northerly direction. The site is mostly covered in concrete hardstand or bitumen ground surface, followed by variable thicknesses of gravel roadbase, reworked clay or silty sand fill materials to depths generally between 0.3-2.7m below ground surface (bgs). Natural soil includes residual clay becoming siltier with inclusions of source rock up to the final investigation depth of 3m.	
Infrastructure	Potable water:	Immediately adjacent to the subject site along the frontage of Horsley Road are 100mm and 150mm water mains.
	Wastewater:	The subject site is serviced by a 225mm sewer main located within the subject site, along the Horsley Road

		frontage. The 225mm pipe size is a standard size required by Sydney Water.
	Electricity:	Existing overhead high voltage power lines, serviced by Ausgrid, are located along Horsley Road.
	Gas:	Jemena has installed a 1,050kPa high pressure gas main in Horsley Road. The subject site is connected to this gas main.
	Telecommunications:	NBN Co is the network provider for this area. Prior to NBN Co being the provider for this area Telstra had fibre optic systems within Horsley Road. The subject site is connected to this reticulation system.
Easements and encumbrances	The subject site is burdened by several easements and encumbrances, pertaining to various infrastructure services. Further details are included in **Section 2.3** of this EIS.	
Access	The subject site currently provides four (4) driveways to Horsley Road, as shown in **Figure 6**.	
Vegetation	Existing vegetation within the subject site is a mixture of planted native and exotic tree and shrub species, landscaped planter beds and lawns, with small areas of self-seeded local and non-local native species evident along the southern boundary. Two (2) plant community types (PCT) have been identified: ▪ Cumberland shale plains woodland (PCT 849), and ▪ Cumberland swamp oak forest (PCT 1800). **Figure 4** shows the extent of each PCT.  **Figure 4 Site Vegetation (Source: ecologique, 2022)**	
Biodiversity	No areas of outstanding biodiversity value lie within the subject site. **Figure 5** shows High Biodiversity Value mapping provided under the *Biodiversity Conservation Regulation 2017*.	

Figure 5 Surrounding Vegetation (Source: ecologique, 2022)

Watercourses	The subject site is located approximately 300m south of a mapped watercourse, which is an unnamed tributary of Georges River. The watercourse is indicatively shown in **Figure 3**.
Wetlands	No mapped local or important wetlands occur within or near to the subject site.

2.1.2 Site Development History

This subject site is currently informed by operational warehouses with ancillary offices and metal fabrication and storage operations.

Figure 6 Site Layout and Features (Source: JBS&G, 2022)

The following subsections provide an overview of the current site operations.

2.1.2.1 Lot 140 (Southern Portion)

Lot 140 comprises a central rectangular warehouse building with adjoining administration area. The warehouse is being used for production of steel products including welding, machine pressing and guillotining. The front portion of Lot 140 contains a central carpark, with entry and exit points for trucks. Transport trucks currently enter along the north driveway and loaded/unloaded in the western or southern parts of the Lot 140.

2.1.2.2 Lot 141 (Northern Portion)

Lot 141 contains a front bitumen surfaced carpark with some grassed areas and planted garden beds along the roadside entry and adjacent to the administration building. Transport trucks currently enter along the north driveway. The front administration building is joint to a central warehouse building that is currently vacant.

A second and larger warehouse building is present in the west portion of Lot 141, surrounded by a concrete driveway. The larger warehouse is mostly vacant, apart from some storage of steel materials. Several stormwater drains are present across the Lot 141 area. Two underground storage tanks (USTs) are present (confirmed previously by a ground penetrating radar [GPR] survey) near the roadway between the two warehouse buildings. Both USTs have been abandoned in-situ by likely methods of concrete or foam filling. No records are available for the reasons for abandonment.

2.1.3 Site Context

The subject site is located in Milperra and is part of the City of Canterbury-Bankstown LGA. It is centrally situated within an IN1 General Industrial zone which is further surrounded by IN2 Light Industrial and SP2 Infrastructure zones. Within 800m, the industrial zone is bounded to the south, and to the north by Milperra Road which both provide access back to the Sydney CBD. In addition to this, a small water canal runs perpendicular to Horsley Road 400m north of the site, which is an unidentified tributary of Georges River. Due to the industrial nature of the surrounding context, the proposed development will have minimal adverse impact to the neighbouring buildings and is functionally appropriate for its location.

Surrounding land uses are described as follows:

- North: Horsley Road runs north fronting on both sides are a series of commercial / industrial businesses including Autoshift Diesel (mechanic), RoofBros Tile Recycling (recyclers), and Industrial Cleaning Services (cleaners);
- East: Horsley Road thence several automotive dealerships and service centres, material suppliers, recycling centres, and general businesses and shopfronts.;
- South: Adjacent to the site is a series of commercial / industrial material supply businesses, with Western Sydney University Bankstown Campus further south; and
- West: Directly adjacent are several commercial / industrial warehouses and businesses. Further on is Ashford Avenue fronting TGM Automotive and Milperra Tyre Service (mechanics).

Figure 7 Urban Context (Source: SBA Architects, 2022)

2.1.4 Relevant Future Projects

A search of Canterbury-Bankstown's DA tracker revealed several development proposals within close proximity to the site (as at early August 2022) including:

- DA-191/2022 (in progress) – 2 Ashford Avenue, Milperra
  - Proposed change of use of the existing site from an air conditioner manufacturing facility to a vehicle sale and hire premises.
  - Located approximately 400 metres northwest of the site.
- DA-627/2021/A (approved) – 184 Milperra Road, Revesby
  - Demolition of existing warehouse building, construction of a multi-unit warehouse facility, car parking, signage and associated landscaping.
  - Located approximately 480 metres east of the site.

No SSD projects have been identified within the vicinity of the subject site.

The potential cumulative impacts of the project are addressed in **Section 6.2** of the EIS in accordance with the *Cumulative Impact Assessment Guidelines for State Significant Projects*.

2.2 LAND OWNERSHIP

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

TABLE 5: REGISTERED LAND OWNERS	
Lot/DP	**Registered Land Owner**
Lot 140 DP 550194	ITG Australia TS Mid (ACN 642 379 226)
Lot 141 DP 550194	ITG Australia TS Mid (ACN 642 379 226)

Land owners consent has been obtained from all entities.

2.3 EASEMENTS & ENCUMBRANCES

The encumbrances noted within the Certificate of Title and Title Diagram of lots described in **Section 2.2** above are summarised in **TABLE 6**, and a copy of the relevant documents included in **Appendix 3**.

TABLE 6: ENCUMBRANCES ON TITLE

Reference	Description and Location	Burdens / Benefits
DP 550194	Easement to drain water appurtenant to the land over existing line of pipes designated M to N in DP 550194	Burdens Lot 141 / Benefits Lot 140
N 666314	Easement to drain sewage affecting that part of the land within described shown as broken lines designated W to X and notation easement to drain sewage over existing pipes in DP 550194	Burdens Lot 140 / Benefits Metropolitan Water Sewer & Drainage Board
N 666315	Easement to drain sewage appurtenant to the land above described affecting the land shown as broken lines designated X to Y and notation easement to drain sewage over existing pipes in DP 550194	Burdens Lot 141 / Benefits Metropolitan Water Sewer & Drainage Board
N 666317	Easement to drain sewage appurtenant to the land above described affecting the land shown as broken lines designated Y to Z and notation easement to drain sewage over existing pipes in DP 550194	Burdens Lot 142 (former lot to the north) / Benefits Metropolitan Water Sewer & Drainage Board

As part of the proposal, the abovementioned easements and associated infrastructure are sought to be decommissioned as they only service the subject site, which will be upgraded as part of this application. Consultation with Sydney Water has been undertaken, as documented within **PART 5** of this EIS.

2.4 SITE SUITABILITY

The subject site is located within an established industrial precinct and is zoned IN1 General Industrial under BLEP2015. The proposed development would facilitate the intended use of the subject site for industrial purposes, which is consistent with the zoning and the surrounding context.

The proposed development falls within the definition of 'warehouse or distribution centre', being *a building or place used mainly or exclusively for storing or handling items (whether goods or materials) pending their sale, but from which no retail sales are made, and includes local distribution premises*, which is permissible with consent in the IN1 General Industrial zone, pursuant to the BLEP2015.

The subject site is highly-suited to accommodate the intended redevelopment based on the following factors:

- BLEP2015 allows for the proposed development as a permissible use;
- The site is readily accessible via the regional road network;
- The proposed development is compatible with surrounding development and local context;
- The subject site can be serviced immediately and at no cost to Government;
- The proposed development causes minimal impact on the environment;
- The proposed built form is designed to mitigate any impacts on surrounding properties; and
- The proposed development is consistent with strategic intent of the area.

2.4.1 Key Considerations for Site Suitability

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

2.4.1.1 Strategic Planning Policy Considerations

TABLE 7: STRATEGIC PLANNING CONSIDERATIONS FOR SITE SUITABILITY	
Matter Considered	**Justification**
NSW State Priorities	There are 12 priority areas identified as essential for the growth and development of NSW. The proposal is capable of contributing to the delivery of the following priorities: ▪ Encouraging business investment: The proposed warehouse and distribution centre will assist in the stimulation of Canterbury-Bankstown economy, through the reinvigoration of a dated industrial site, which will be transformed into a new age facility; setting a high precedent for an otherwise aged industrial area. ▪ Accelerating major project assessment: The need for warehousing and distribution was given a burning platform by changes to business as usual catalysed by COVID-19. The NSW DPE recognises warehouse and distribution centres as a type of development 'well-placed' to support short-term economic recovery from COVID-19. Warehouse and distribution centres were included as one infrastructure asset encouraging investment and job-generating development in NSW DPE's Productivity Acceleration Package. This relative importance is reflected in the Planning Systems SEPP, allows greater for warehouse and distribution centres to be assessed as SSD. ▪ Improving road travel reliability: The subject site is well located with access to key road infrastructure. The proposal is consistent and strategically aligned with the NSW State priorities.
Greater Sydney Region Plan: A Metropolis of Three Cities	The division into three (3) cities puts workers and the wider community closer to an array of characteristics such as, intensive jobs, 'city-scale' infrastructure and services, entertainment and cultural facilities. By managing and retaining industrial land close to city centres and transport, this will ensure critical and essential services are readily available to support local businesses and community members and residents. Once constructed and operational, the subject site would achieve economic growth and prosperity, as well as encourage employment-generating opportunities within an area zoned for such permissible purposes, that is considered relatively close in conjunction to residential communities, providing an ease of commute. The proposed development of the subject site considers the employment-generating outcomes that can be achieved for the immediate and wider localities. The proposed development also contributes to the four (4) standardised elements communicated across for all three (3) cities, including: ▪ Infrastructure and collaboration – the proposed development of the site for the purposes of a warehouse and distribution facility would facilitate the provision of services to support the wider locality and region; ▪ Liveability – the proposed development encourages employment-generating opportunities and economic prosperity, closer to where people live, which has positive influences on the wider locality;

	▪ Productivity – the proposed development is situated within the *South District Plan*; and, ▪ Sustainability – the proposed development would not exhibit or emit any detrimental impacts to its wider ecological surroundings. In summary, the subject site and proposed development contributes to the objectives set out in the *Greater Sydney Region Plan – A Metropolis of Three Cities* by promoting minor environmental impacts and the further promotion of technological advancements and employment-generating opportunities to the wider locality and community, positioned within the Canterbury-Bankstown LGA.
South District Plan	The subject site forms part of the South District, as covered by the *South District Plan*. Of relevance is the identification of the Milperra industrial area as the largest employment precinct in the South District, which can be used as a base to leverage the growth of internationally competitive sectors to increase productivity and local jobs for the district. The subject site is part of a 'collaboration area' with strategic opportunities identified by the Commission. The *Bankstown Airport Masterplan 2014* sets aside 130 hectares of land adjacent to Milperra for future development for non-aviation uses, with the aim of developing an industrial economic and employment hub. Together with the established Milperra industrial area (within which the subject site is located, this area is well located with access to air transport, the road and rail freight network; the proposed Moorebank intermodal terminal; Liverpool; Bankstown; and the Liverpool health and education precinct. Public transport for workers could improve with the potential expansion of the Sydney Metro City & Southwest from Bankstown to Liverpool. This proposal aligns with the Planning Priority S10, which aims to retain and manage industrial land, as it seeks to reinvigorate an otherwise dated and rundown industrial site, to cater for the industry advancements and best practice for warehousing and distribution, and associated land uses.
Connective City 2036	The *Connective City 2036* reiterates the importance of retaining and managing industrial and urban services land to generate: ▪ An increase in jobs, commerce and local services; and ▪ An increase in industrial, distribution and warehousing businesses servicing Greater Sydney. One (1) of the five (5) City Directions focuses on the Bankstown Aviation and technology Precinct, which identifies opportunities for industrial lands in Milperra: *The industrial lands in Milperra, the Airport's southern edge and Condell Park will be retained and managed. The area will evolve into an advanced manufacturing, industrial technology, freight and logistics hub anchored by Bankstown Airport. This precinct will transition into high amenity industrial precinct with greener public domain.* The proposed speculative warehouse and distribution centre retains the subject site for its intended purpose, allowing for the evolution of opportunities as they arise.
Future Transport Strategy 2056	The *Future Transport Strategy 2056* is a 40 year strategy, supported by plans for regional NSW and for Greater Sydney. The strategy and plans focus on the role of transport in delivering movement and place outcomes that

	support the character of the places and communities that are desired for the future. The proposed development aligns with the strategies of Future Transport on the following basis: ▪ the site has access to regular public transport services; ▪ the site is accessible by active transport; ▪ parking provision is appropriate; ▪ access, servicing and internal layout will be provided in accordance with Australian Standards AS2890.1-2004 and AS2890.2-2018; ▪ the surrounding road network and intersections will be able to cater for the proposed development traffic.

2.4.1.2 Site-specific Considerations

TABLE 8: SITE-SPECIFIC CONSIDERATIONS FOR SITE SUITABILITY	
Matter Considered	**Justification**
Visual impact	The significance of the impact upon the landscape at this project development on average to be minor. This is in part due to the surrounding character of the development already being heavily influenced by industrial development. It is demonstrated that the proposed development will cause a change in the view for a very small minority of properties. Road users' pedestrians, and cyclists have been identified as been identified as being impacted at a low level. Views from adjacent industrial properties to the north, west and south of the site shall have views to the proposed development but are to be mitigated with tall native canopy trees, screening shrubs and groundcovers are planted. Following maturity, these planted buffers will provide a dense screen to help to soften and screen the development. The development proposes substantial landscape planting to offset the visual impact in the form of setbacks with dense tree and shrub planting. This will be most effective after 15 years for those receptors who experience direct views. Refer to **Section 6.1.5** of this EIS for further information.
Infrastructure	The subject site is suitably located with access to infrastructure and utility services. Refer to **Section 6.1.21** of this EIS for further information.
Transport and traffic	The subject site forms part of an established industrial area, generally bounded by Milperra Road to the north, the M5 Motorway to the south, Queen Street to the east and Ashford Avenue to the west. The capacity of the existing road network is largely determined by the capacity of its intersections to cater for peak period traffic flows. The SIDRA analysis undertaken by Colston Budd Rogers & Kafes has found that surrounding intersections provide a good level of service, with capacity to cater for the proposed development. Refer to **Section 6.1.6** of this EIS for further information.
Stormwater and flooding	Council's Flood Letters and Council's online Stormwater and Flood Maps indicate there is no flooding in the 1% annual exceedance probability (AEP)

	local events, but some flooding in the probable maximum flood (PMF) event, which is understood to be RL 10.30m AHD. Bulk earthworks are proposed to achieve building pad of 10.75m AHD (FFL of RL 11.05 (±500mm)), which is above the PMF level. Refer to **Section 6.1.14** of this EIS for further information.
Contamination and soil condition	A Remedial Action Plan (RAP) has been prepared to remediate the subject site. Subject to the successful implementation of the measures described in this RAP (**Appendix 21**), and its recommendations, it is concluded that the subject site can be made suitable for the intended uses and that the risks posed by contamination can be managed in such a way as to be adequately protective of human health and the environment. Refer to **Section 6.1.16** of this EIS for further information. Upon completion of the remediation works, a Validation Report is required to be prepared to verify remedial works were completed in accordance with the RAP.

2.4.2 Summary of Site Suitability

The subject site's consistency with applicable regional and local strategies is demonstrated in the comprehensive environmental assessment, provided in **PART 6** of this EIS, which includes an analysis of all potential impacts, which has been informed by the relevant consultant reports. Accordingly, the environmental assessment prescribes recommendations and mitigation measures (where necessary), to account for all identified potential impacts, by the proposed development. The suitability of the subject site with regard to the proposed development, can be attributed to its ready ability to provide employment, its excellent access arrangements, its suitable contextual setting, and its minimal impact on the environment.

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

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

PART 2 of this EIS demonstrates the site's suitability for the proposed development.

PART 3 PROJECT DESCRIPTION

3.1 OBJECTIVES OF THE PROPOSAL

The aim of the proposed development is to provide a speculative warehouse and distribution centre, in line with Industry Best Practice, resulting in:

- Support the growth and transformation of the industrial sector;
- Employment generation – during construction and once the development is operational;
- Improved access to jobs for residents of the immediate community and wider locality;
- Demonstrated architectural excellence, through siting and design compatibility, with minimal visual impact; and
- Provision of suitable mitigation measures where required, to minimise any unforeseen impacts arising in the future.

Hale Capital Development Management Pty Ltd seek to construct a warehouse and distribution centre that accommodates the needs of an array of end users. With that in mind, the design of the proposed development provides flexibility to accommodate potential end users.

3.2 PROJECT OVERVIEW

Development consent is sought for the construction and operation of a SSD warehouse and distribution centre, pertaining to the following scope of works:

- Demolition and removal of all existing buildings and structures;
- Site preparation works, including the removal of 70 trees;
- Earthworks, to achieve an FFL of RL 11.05 (±500mm);
- Provision of site infrastructure;
- Lot amalgamation;
- Three (3) vehicular crossovers to Horsley Road;
- Construction of two (2) warehouse buildings, split over two (2) storeys, with ancillary office offerings;
- On-site car and bicycle parking;
- Complementary landscaping and planting to offset tree removal;
- Business identification signage zones; and
- Allowance for operations up to 24 hours per day, seven (7) days per week.

Consent is sought to develop the subject site in accordance with the following provisions.

TABLE 9: SUMMARY OF PROJECT PARTICULARS

Project Element	**Development Particular**	
Site Area	33,772m^2	
Site Description	339 and 349 Horsley Road, Milperra (Lot 140 and 141 DP 550194)	
General	The proposed development is considered SSD, pursuant to Schedule 1, Clause 12 of the Planning Systems SEPP.	
Primary Land Use	Warehouse and Distribution Centre	
Gross Floor Area (GFA)	Tenancy 01	2,548m^2
	Tenancy 02	2,677m^2
	Tenancy 03	2,246m^2

	Tenancy 04	4,183m^2
	Tenancy 05	4,615m^2
	Tenancy 06	2,537m^2
	Tenancy 07	2,677m^2
	Tenancy 08	2,240m^2
	Tenancy 09	4,183m^2
	Tenancy 10	4,609m^2
	Total	32,799m^2
Floor Space Ratio	0.97 : 1	
Building Height (max.)	22.4m (RL 33.45m AHD)	
Number of Stories	Two (2) storeys	
Tree Removal	70 trees are proposed for removal: ▪ 11 trees are exempt under the *Canterbury Bankstown Development Control Plan 2015* (BDCP2015) ▪ 2 trees are recommended for removal as they are dead or in poor structural condition ▪ 57 trees have unmitigable encroachments and will require removal to facilitate the proposed development	
Landscaping	3,192.25m^2 (9% of the site) plus 188.65m^2 for the upper outdoor open space area planting (10.01% of the site)	
Earthworks	Bulk earthworks are proposed to achieve building pad of 10.75m AHD (FFL of RL 11.05 (±500mm)), as documented in **Section 3.3.2.1**	
Car parking	174 car parking spaces (including 10 accessible spaces)	
Motorcycle parking	20 motorcycle spaces	
Bicycle parking	20 bicycle spaces	
Hours of Operation	24 hours per day, seven (7) days per week	
Construction Hours	Standard construction hours of: Monday to Friday, 7:00am to 6:00pm, and Saturday, 8:00am to 1:00pm.	
CIV	$90,017,131.00 (exc. GST)	
Construction Jobs	Approximately 290.1 construction jobs	
Operational Jobs	Approximately 566 jobs per year as a conventional warehouse or 457 as a semi-automated warehouse.	

3.3 DEVELOPMENT DESCRIPTION

3.3.1 Project Area

The project area, as assessed for SSD-45998963 is identified as 339 and 349 Horsley Road, Milperra, which encompasses Lot 140 DP 550194 and Lot 141 DP 550194. The two (2) lots will be amalgamated to cater for the proposed development. The developable site area for the proposal is 33,772m^2, which attributes to the full surveyed area of both lots.

3.3.2 Physical Layout and Design

3.3.2.1 Site Preparation

Site preparation works are required to facilitate a suitable development platform for the proposed development; such works are described in **TABLE 10**.

TABLE 10: SITE PREPARATION REQUIREMENTS	
Project Element	**Proposed Works**
Demolition works	The proposal involves demolition of all existing buildings and structures on site, including the decommissioning of existing onsite sewage and stormwater drainage systems and existing padmount substation. As demolition plan is included within **Appendix B** of this EIS.
Tree removal	The proposed development necessitates the removal of 70 trees, as shown in **Figure 8**, of which 11 trees are exempt under the BDCP2015, and two (2) are recommended for removal as they are dead or in poor structural condition. This leaves a total of 57 trees that require development consent for their removal. The value of the trees requiring consent for removal are summarised as follows: ▪ 8 are of high retention value ▪ 11 are of medium retention value ▪ 38 are of low retention value – these are attributed to 34 tags in the Arboricultural Impact Assessment (AIA) Report In addition, a total of 13 trees under 12 tag numbers will also be subject to a major tree protection zone (TPZ) encroachment for bulk earthworks in the south-eastern corner, southern boundary, and south-western corner of the subject site. However, it is anticipated that these trees will remain viable subject to project arborist supervision during the bulk earthworks stage, including fill, grading and kerb edging, largely due to the existing health of the trees, likelihood of root grafting and already mulched garden bed areas in which they are located. A tree protection management plan is included in **Appendix B** of this EIS.
Infrastructure works	The proposal includes provision of a new padmount substation, in consultation with Ausgrid.
Site remediation works	To ensure that the subject site is made suitable for the intended uses and that the risks posed by contamination can be managed in such a way as to be adequately protective of human health and the environment, site remediation works are required. The following order of remedial works shall be undertaken: 1. Excavation, isolation, and removal of any asbestos impacted fill material identified during the demolition of pre-existing structures and concrete hardstands; 2. Decommissioning, excavation, and removal of UPSS and petroleum hydrocarbon impacted soils as per an extent determined by excavation in an inside-out manner and commencing from the location of the UPSS; 3. Dewatering and treatment of any hydrocarbon contaminated excavations as a result of groundwater infiltration, surface water run-off, or increased rainfall;

<table>
<tr><td></td><td>
4. Backfilling of excavations and importation of additional imported fill materials to reinstate excavations and supply clean fill as necessary for the proposed site development.

The processes outlined in the Remedial Action Plan, contained within Appendix 21 of this EIS, be implemented to ensure the risks and impacts during remediation works are controlled in an appropriate manner.
</td></tr>
<tr><td>Easement relinquishment</td><td>
Upon decommissioning of the abovementioned onsite infrastructure (that benefits only Lot 140 and 141), the following easements will be relinquished, as they will serve no purpose:
▪ Easement W to X (easement to drain sewage over existing line of pipes) DP550194
▪ Easement X to Y (easement to drain sewage over existing line of pipes) DP550194
▪ Easement M to N (easement to drain water over existing line of pipes) DP550194
</td></tr>
<tr><td>Bulk earthworks</td><td>
Bulk earthworks are proposed to facilitate a large flat building pad of 10.75mm AHD. A high-level earthworks volume estimate has been completed for the proposal, as document below.

<table>
<tr><th></th><th>Apparent Volume</th><th>Upper Bound (+15%)</th><th>Lower Bound (-15%)</th></tr>
<tr><td>Cut (m^3)</td><td>- 4,450</td><td>- 5120</td><td>- 3780</td></tr>
<tr><td>Fill (m^3)</td><td>+ 18,310</td><td>+ 21,055</td><td>+ 15,565</td></tr>
<tr><td>Detail Excavation (@ 2000m^3/ Ha)</td><td>- 6,740</td><td>- 7,750</td><td>- 5,730</td></tr>
<tr><td>Balance (m^3)</td><td>+ 7,120</td><td>+ 8185</td><td>+ 6,055</td></tr>
</table>

The estimated volumes are based on the drawings prepared by Costin Roe Consulting, contained within Appendix B of this EIS.

Final levels would be subject to +/-0.5m variance to allow for variations in geotechnical conditions, final building layout and height, and drainage conditions.

To facilitate these levels, retaining will be required.

The civil engineering objective is to minimise retaining wall within the proposed development, through grading and batters where possible.

Notwithstanding, retaining will be required along the northern boundary of the subject site. This wall is noted to be approximately 1.6m high and 235m in length, comprising of modular masonry block system (keystone) with reinforced soil backfill.

Retaining on the southern boundary is also required. This wall will be up to 3.4m in height and 110m in length, comprising of reinforced concrete block system.

Retaining is to be provided for the ramps leading up to and down from level 1, either through the adjacent building concrete panels or by retaining wall.

A bulk earthworks design plan is contained within Figure 10 and Appendix B of this EIS.
</td></tr>
</table>

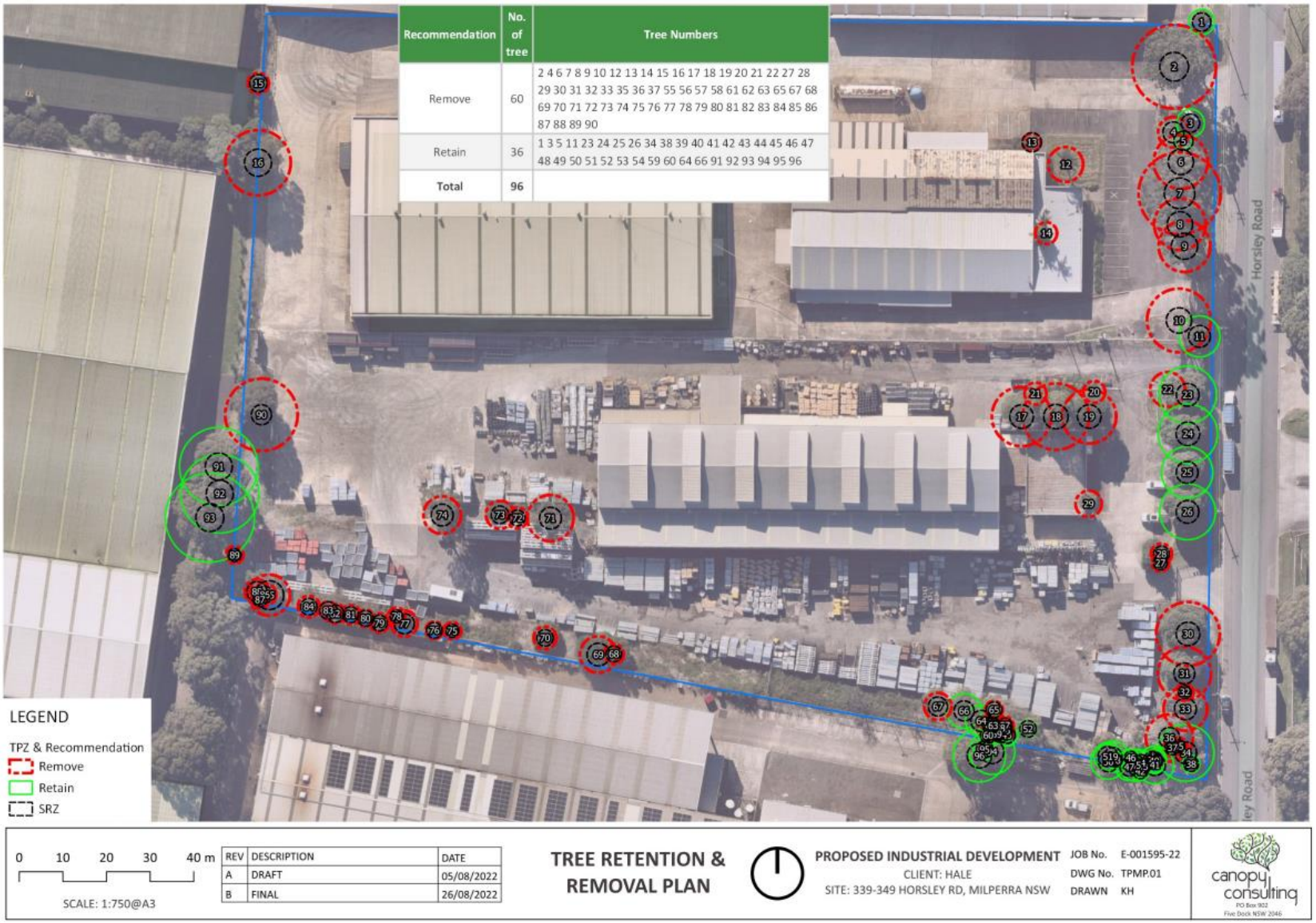


Figure 8 **Proposed Tree Retention and Removal Plan (Source: Canopy Consulting, 2022)**

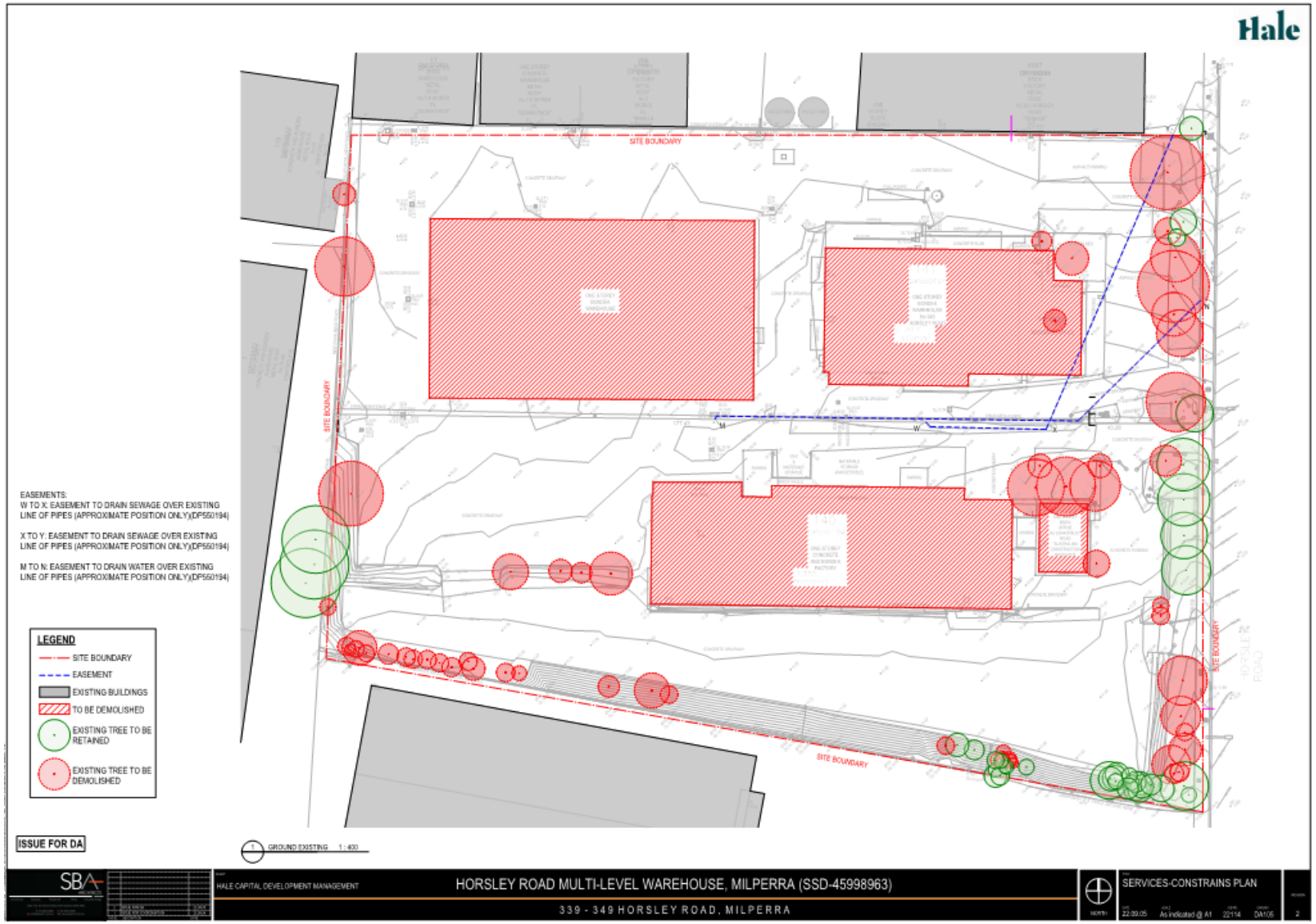


Figure 9 **Demolition Plan (Source: SBA Architects, 2022)**

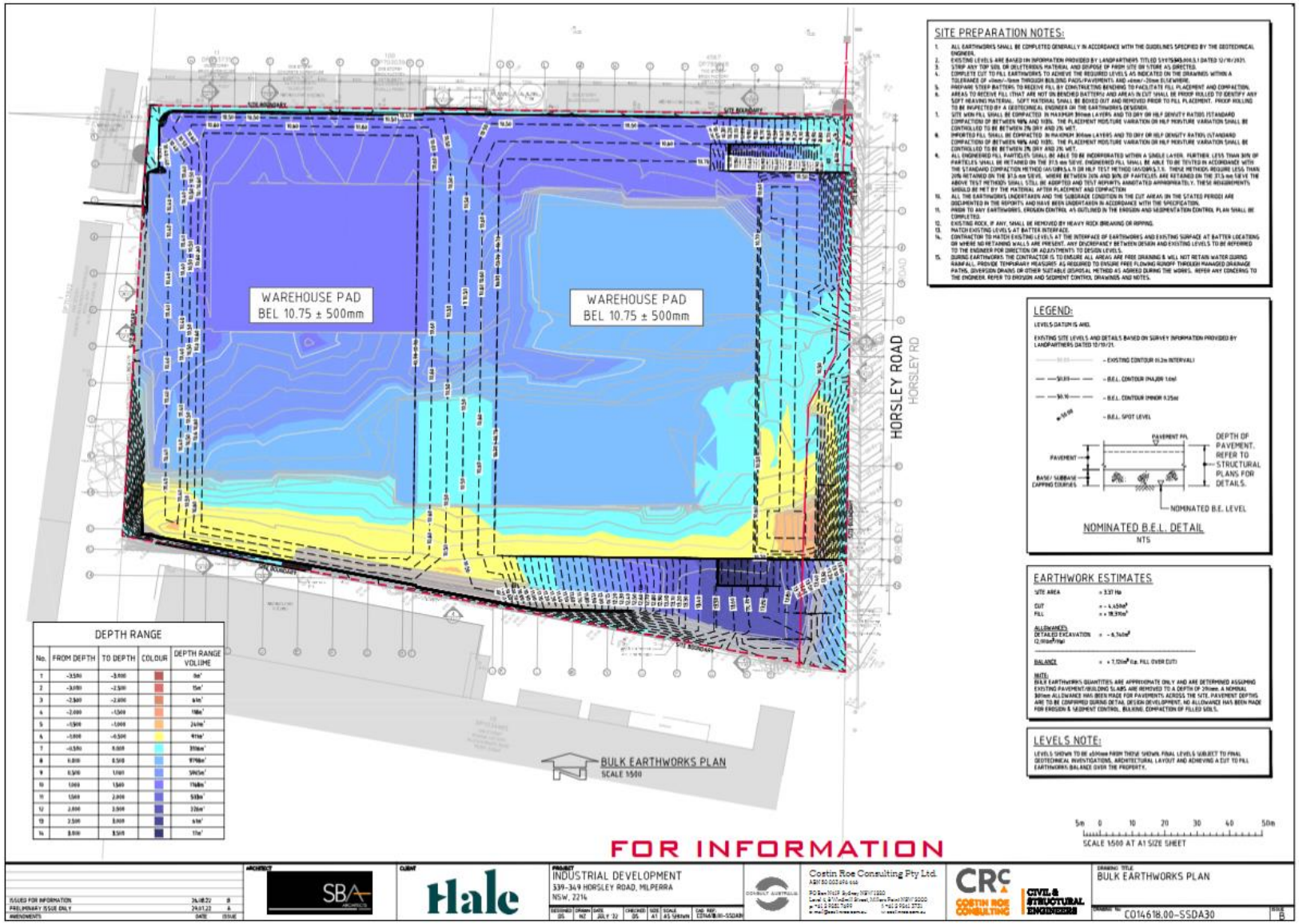


Figure 10 **Proposed Bulk Earthworks Plan (Source: Costin Roe Consulting, 2022)**

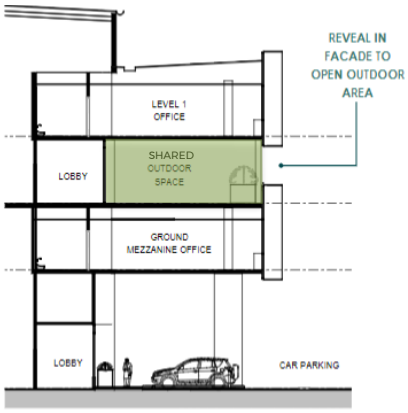
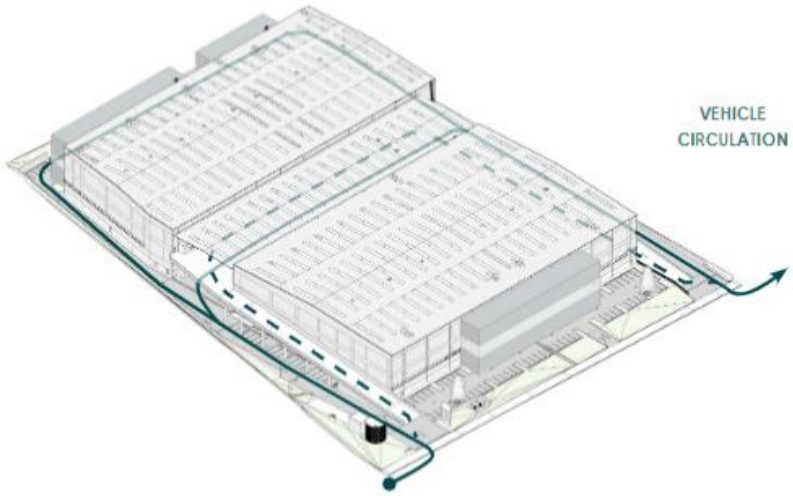
3.3.2.2 Built Form

The proposed development consists of two (2) warehouse buildings, Building A, facing the Horsley Road frontage to the east, and Building B, facing the west at the rear of the subject site. Both buildings cater for multiple tenancies across two (2) levels. The two (2) buildings are separated by a heavy vehicle thoroughfare that runs south to north, through the centre of the subject site.

The proposed development has been designed to meet the SEARs criteria for Built Form and Urban Design, to achieve a high quality architectural response.

TABLE 11: BUILT FORM ELEMENTS

Project Element	Design Considerations
Development siting	The site length runs along the east-west axis exposing the short facades to the east and west sun. The building has been organised to locate the offices in these areas, with significant façade treatments to address the direct light. The entrance to the site is accessed directly off Horsley Road, which provides significant viewpoints towards the east warehouse and office façade. The main vehicle transport routes come from the two major roads, Milperra Road and the South-Western motorway which both connect directly and indirectly through Horsley Road. There are a multitude of pedestrian and bicycle pathways that run adjacent to the road and connect through to the Western Sydney University and residential zone to the south-east and west of the site.
Development scale	Due to the scale of the warehouse, the design identified precedent examples where the office facade is articulated by cantilevers, overhangs, and louvers. Given the east and west facing offices, passive solar shading is required. Utilising deep exterior louvers spaced across the facade can provide passive shading from the direct sunlight. The design also incorporates an open outdoor area for occupants, which is framed by the office spaces.
Development massing	The building is divided into two masses with a breezeway in-between them. The breezeway creates a clear circulation for trucks to parallel load on both levels, with compliant ramps for truck access. Each building is designed to provide multiple warehouses and mezzanine levels to maximize the site efficiency. A total of ten tenancies are provided, with warehouse 1-5 located on the ground floor and warehouse 6-10 on level 1. To ensure natural lighting to both warehouse levels, skylights have been implemented into the roof canopy to provide natural light into the interior of the level 1 warehouses, and glazed windows have been incorporated to the perimeter of the ground level warehouse (at a height that maintains security for the warehouse users).
Office locations	Three ancillary office blocks are provided at the east and west facades of the warehouse. The offices are located at a mezzanine level of both the ground and first level of the warehouse. Due to the extent of the glazed curtain wall, the design of the office facade uses deep external louver blades that acts as a passive solar shading device for the direct sunlight coming from the east and west.
Communal open space	An outdoor space is designed between the two office levels. The outdoor area is utilized as a shared space for both ground and upper-level offices.

	This enhances the quality of the amenity and allows for connection and interactions between office and warehouse staff. A cut is made in the louvered facade treatment to reveal the open outdoor space beyond, to allow for a clearer outlook and the exposure of the planter vegetation.  
Circulation and access	The vehicle truck movement has been organised into a singular direction to maximise efficiency. The entry is located on the southern side of Horsley Road, which allows access to the ground floor and level 1 hardstand by a compliant ramp. All routes then direct to a single exit located parallel to the northern boundary of the site.  New vehicular cross-overs are proposed to Horsley Road, which require consideration of the *Roads Act 1993*.

Materiality	 The warehouse facility uses a combination of grey toned warehouse cladding to articulate and breakdown the scale of the facade. The strips of cladding wrap around the facades creating a sense of unity and tie into the office facades. Depth is created through the accentuated office with the reflective metallic louver blades that create a prominence to the entry.
Streetscape	The east elevation (Horsley Road frontage) holds the most critical view of the street frontage, in response to this importance the proposed development has very little impact to the neighbouring buildings by matching the scale and height profile of the surrounding urban context. Additionally, the warehouse employs an articulation that relates to the height lines of the smaller neighbouring building typologies. The north elevation demonstrates the difference in height profile to the adjacent properties across Horsley Road. However, this disconnection is minimised through the street separation, building setback and the inclusion of facade articulation that carries the existing height profile through the site. The west facade of the building matches the height profile of the adjacent lots and carries this through to the street frontage. The streetscape environment is illustrated in **Figure 14** for context.

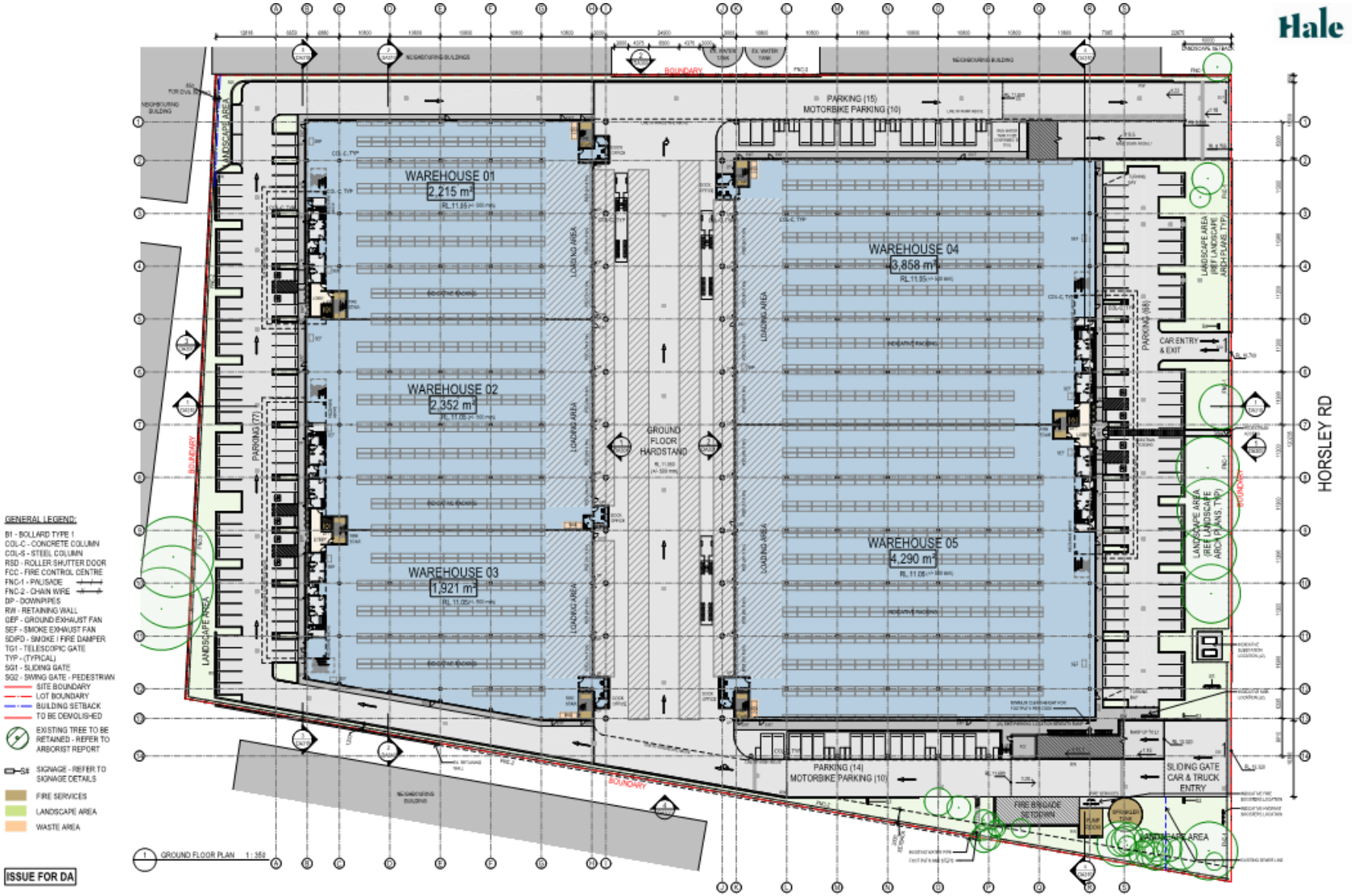


Figure 11 Proposed Site Plan (Source: SBA Architects, 2022)

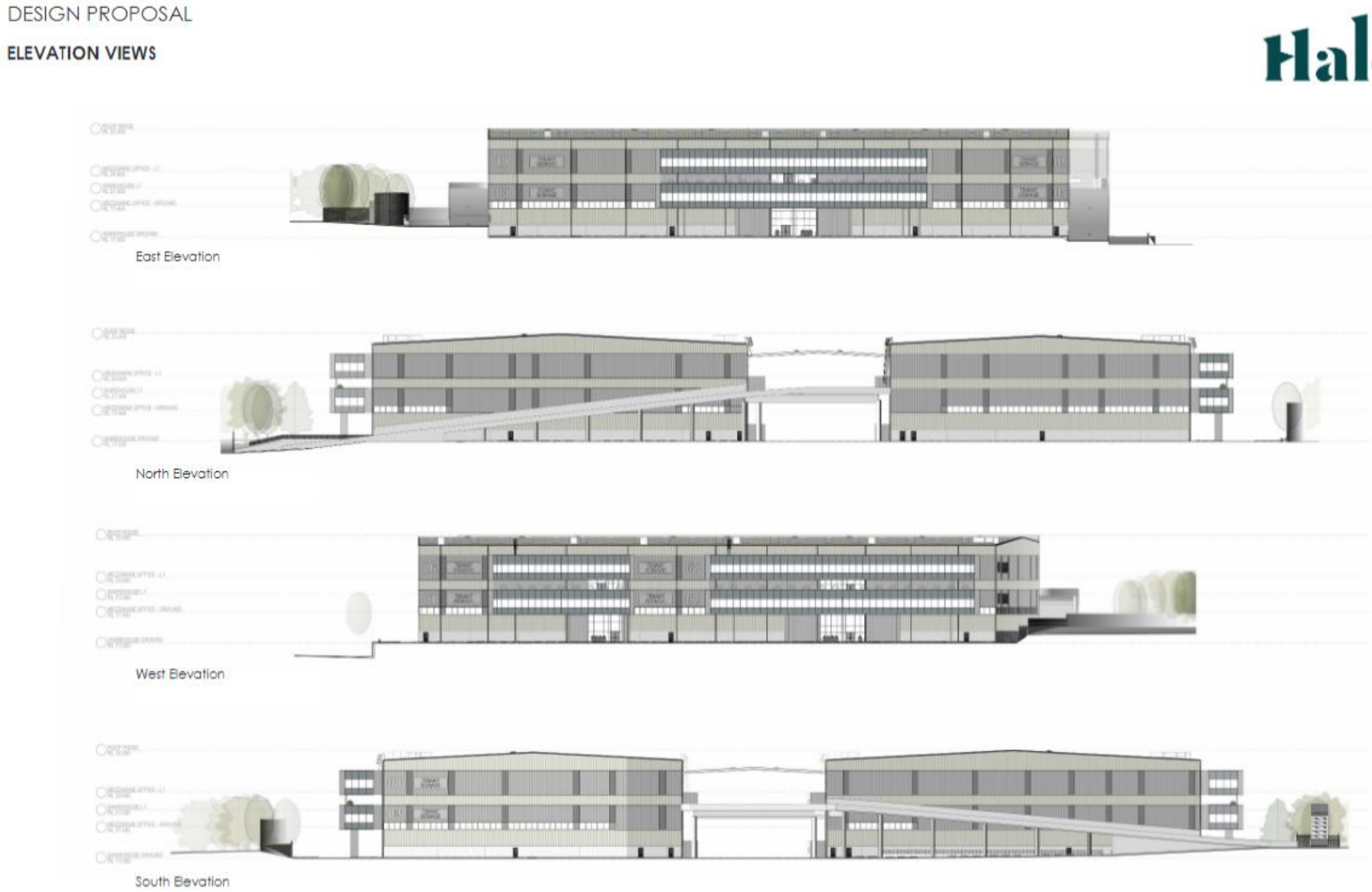


Figure 12 **Proposed Elevations (Source: SBA Architects, 2022)**

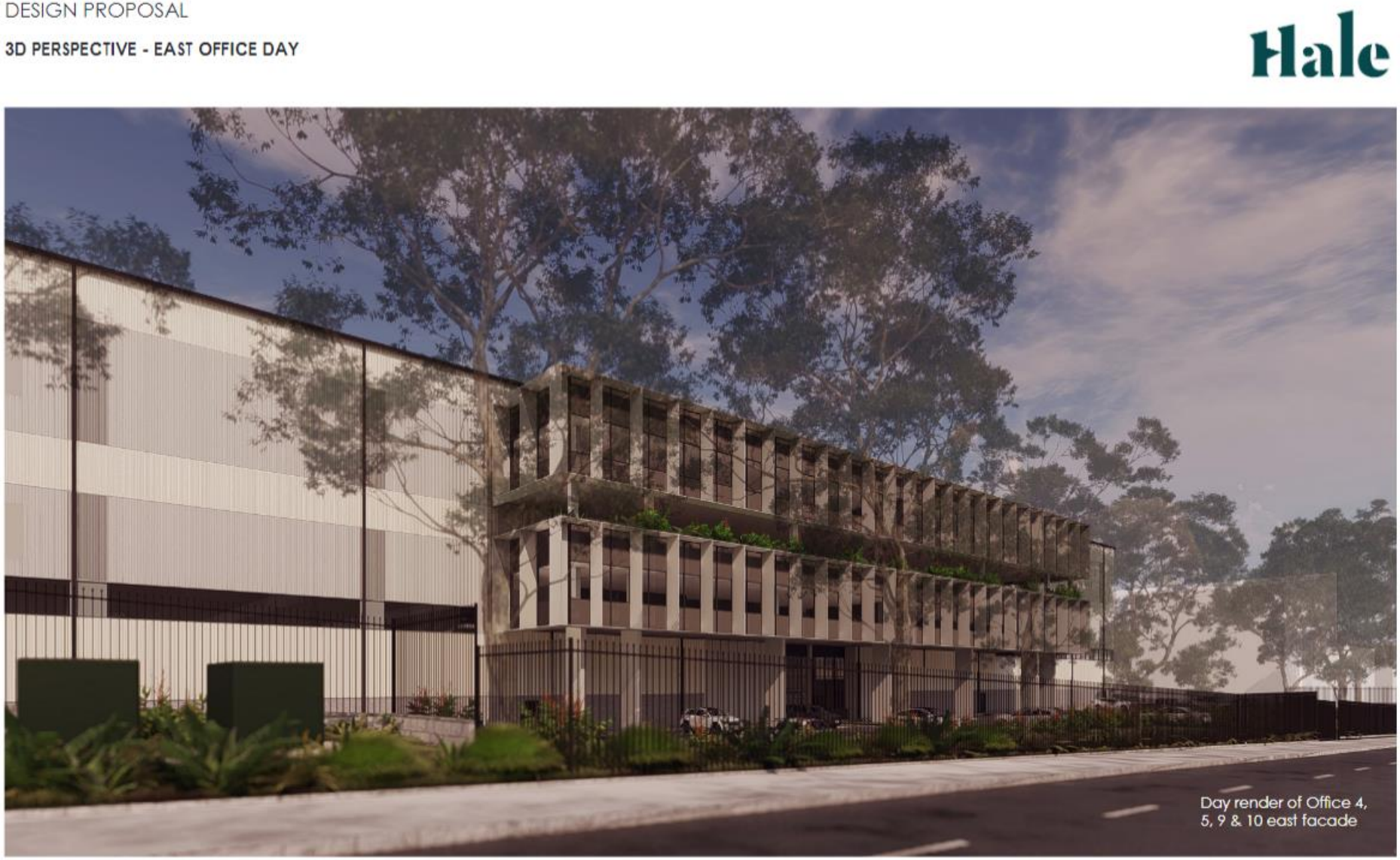


Figure 13 Building Perspective Illustration (Source: SBA Architects, 2022)

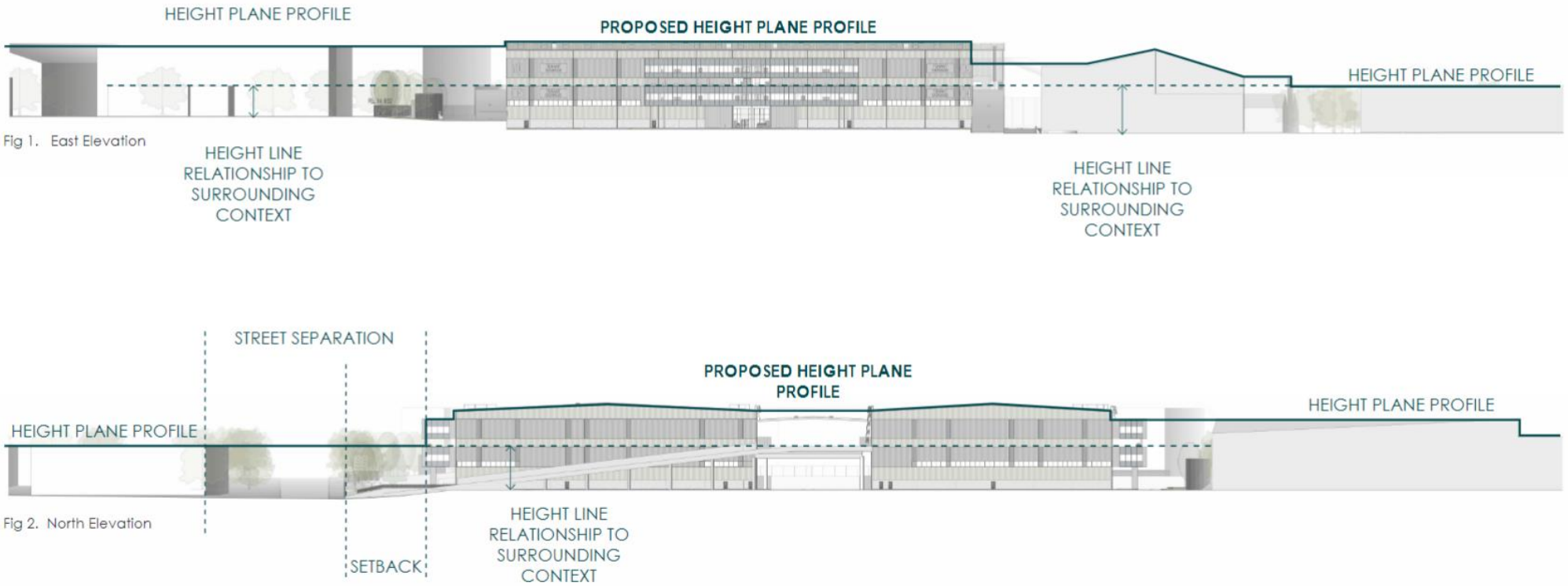


Figure 14 Streetscape Height Plane Profile (Source: SBA Architects, 2022)

3.3.2.3 Landscaping

In line with the NSW Government Architect's Greener Places Framework, the proposed development has been designed to be a high performing, multi-functional landscape which seeks to maintain existing landscape features (where possible). Through its design considerations the proposal has managed to retain 37 trees on site, particularly within the Horsley Road streetscape area.

The retention of existing trees and proposed tree planting will form a canopy screen similar and better than the existing buffer of trees.

The resulting landscape characteristics of the proposed development include:

- A total of 183 trees; and
- A total canopy cover of 3,809m^2 (11.29% of the site area).

3.3.2.4 Signage

The proposal involves business identification signage, which has been assessed under the *State Environmental Planning Policy (Industry and Employment) 2021* (Industry and Employment SEPP).

The proposed signage parameters are detail in **TABLE 12**.

TABLE 12: SIGNAGE DETAILS

Sign Type	Dimensions (width x height)	No.	Description
Business identification	3.5m x 9.0m	1	S1 – Estate signage for future tenant business identification signage
Pylon sign	1.0m x 2.18m	2	S2 – wayfinding
Pylon sign	1.0m x 4.0m	1	S3 – wayfinding
Pylon sign	1.0m x 2.18m	1	S4 – wayfinding
Building identification	2.2m x 2.2m	10	Tenancy numbering '01' through to '10' on the warehouse facade
Business identification	7.0m x 2.2m	10	Signage zones for future tenant business identification signage on the warehouse facade

All proposed signs are located within the boundaries of the subject site.

Signage will be considered on an estate-wide basis, such that there will be consistency in materials and finishes of the signs across the estate. Signage will be a combination of building mounted signs, and estate and tenant identification signs in landscape setbacks, at driveway entries and building entrances. The signage design will be considered as part of the landscape and architectural language of the buildings, to provide placemaking and wayfinding principles for safety and user experience throughout the estate.

As required by Clause 3.6 of the Industry and Employment SEPP, an assessment against its Schedule 5 is provided in **Appendix 30** of this EIS.

3.3.2.5 Transport and Parking

The proposal seeks to facilitate three (3) vehicular crossovers to Horsley Road, as follows:

- One (1) driveway in the site's north for both light and heavy vehicle egress
- One (1) driveway in the site's south for both light and heavy vehicle ingress
- One (1) central driveway for both ingress and egress for light vehicles

The proposal accommodates the following parking on site:

- 174 car parking spaces (including ten (10) accessible spaces)
- 20 motorcycle parking spaces
- 20 bicycle parking spaces

Heavy vehicles will access the warehouse on both the ground and upper levels. A one-way ramp is proposed to connect to and from the upper level, with grades of a maximum of 1:8.5 and a 1:16 transitions over 10m to appropriately provide for 20m semi-trailer and 26m B-double vehicles, in accordance with the Australian Standard for Parking Facilities, AS 2890.2:2018.

3.3.2.6 Stormwater Management

With reference to the drawings contained in **Appendix B** of this EIS, the proposed drainage system can be described as follows:

- In-ground piped drainage system designed to the 5% AEP (1 in 20yr ARI);
- Site discharge via the existing street drainage in Horsley Road;
- Treatment of stormwater via an end-of-line Gross Pollutant Trap;
- Conveyance of overland flow from the site through the hardstand and carparking areas to Horsley Road.

3.3.3 Use and Activities

The proposed warehouse(s) will be used for warehousing and distribution activities, which will include the following activities throughout the life of the project (construction through to operation):

- Demolition of existing buildings and infrastructure
- Removal of trees
- Remediation of land contamination
- Bulk earthworks
- Provision of servicing infrastructure
- Construction works
- Storage and handling of goods/materials
- Transport of goods/materials

3.2.3.1 Hours of Operation

The facility is proposed to operate 24 hours a day, seven days a week.

3.2.3.1 Hours of Construction

Subject to conditions of consent, work associated with construction activities will generally be carried out between the following hours:

- Monday to Friday: 7:00 am to 6:00 pm;
- Saturday: 8:00 am to 1:00 pm; and
- Sunday/public holidays: no work.

3.3.4 Timing

3.3.4.1 Staging

The approval strategy seeks to obtain Development Consent to complete the construction works over several construction stages upon issue of the relevant Construction Certificates; however, any such staging does not constitute staged development as defined under Section 4.22 of the EP&A Act.

3.3.4.2 Phases

Construction will be carried out in three (3) phases consisting of:

- Site preparation involving demolition, remediation, earthworks and infrastructure.
- Warehouse construction and fit-out.
- Site demobilisation, post-construction site rehabilitation, landscaping and finishing works.

Construction is anticipated to commence in July 2023 (subject to development consent) and involve up to a 12 to 18 month construction programme. This will include bulk earthworks, provision of services and building construction.

3.3.4.3 Sequencing

All construction access to the development would be made via the existing crossover on Horsley Road. Vehicles shall utilise Horsley Road when travelling to and from the site representing the shortest route to the local and regional road networks, minimising the impact of construction.

3.4 PROJECT NEED

The purpose of the proposed development is to provide a warehouse offering, that responds to the intended industrial character and nature of the IN1 General Industrial zone and strategic umbrella of the Milperra industrial area. The proposed development seeks to ensure:

- It is compatible with surrounding development and the local context;
- It would provide development of an otherwise dated land holding;
- It would result in minimal impact on the environment; and
- It would allow for the implementation of suitable mitigation measures, where required.

Overall, the scale of the proposed development is considered suitable, and the built form proposed would completely enhance and renew an underutilised land portion into a modernised warehouse offering. The site design and layout of the built form proposed, seeks to maintain consistency with the zone objectives under the BLEP2015 and enhance the underlying industrial character intended for the site, which is zoned for such permissible land uses. Furthermore, this would be achieved by the resultant built form that would reinforce the nature of the land use and is commensurate to the surrounding environment.

3.5 CONSIDERATION OF ALTERNATIVES

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

(a) 'Do Nothing' Scenario

This option was dismissed as the objectives of the proposal would not be met. If the proposed development was not to proceed, the site would remain as a depleted industrial site, which does not align with the strategic intentions of the area to '*evolve into an advanced manufacturing, industrial technology, freight and logistics hub anchored by Bankstown Airport*' (Connective City 2036).

Based on the above and the justification provided within **Section 3.4**, the 'do nothing' scenario is dismissed.

(b) Development on an Alternative Site

Consideration was given to carrying out development on alternate sites, these were dismissed as the subject site resulted in the most beneficial outcomes for the proposed development.

Beneficial characteristics of the subject site for the proposed development include:

- It's location, being subject to the provisions of the IN1 General Industrial zone pursuant to the BLEP2015;
- All potential environmental impacts concerning the proposed development are able to be suitably mitigated within the site;
- The proximity to the regional road network provides accessibility and linkages to the broader Bankstown Airport area and wider regions;
- The capability for providing employment-generating opportunities (both directly and indirectly), during both the construction and operational phases;
- It's consistency with the surrounding industrial nature of the area;
- It's large proximity to sensitive receivers; and
- The subject site can be developed with appropriate visual amenity achieved given its surrounding context.

(c) Different Site Configuration

The configuration of the proposed development was chosen based on the subject site's topography, road access, and the requirements of the anticipated end users, as well as the need to respond to the character of the surrounding areas.

The desire to maintain as many trees as possible, particularly within the vicinity of Horsley Road, was key consideration during the design process. Due to the topography of the site, the most cost effective approach to achieving flat, workable, building pad would have resulted in significant impacts to existing trees fronting Horsley Road. Through the design process, the proponent has resolved a more expensive civil scheme that allows for the retention of existing trees within the streetscape, including those of high retention value, including the small patch of Cumberland shale plains woodland – refer to **Section 6.1.7** for further details.

Different site configurations were explored, with the following key considerations landing to the proposed design, as documents in **Section 3.3.2** of this EIS:

- Retention of landscape area and vegetation along street frontage.
- Appropriate layout of truck movement with compliant access to and from level 1 hardstand.
- Separation of truck and pedestrian pathway movements.
- Appropriate location of fire services and brigade set down near the entrance to the site.
- Advantageous location of offices to utilise passive solar heating and cooling from the east and west.
- Efficient creation and proposed operation of the shared hardstand between buildings.
- Appropriate introduction of boundary setbacks from surrounding site context, particularly on the north boundary.
- Sufficient inclusion of carparking, motorcycle parking and bicycle parking within the site.
- Creation of open, raised and outdoor office amenity to take advantage of the compact site space.
- Appropriate isolated, central lobby spaces to access both the warehouse and office areas.

It is noted that a different site configuration would not have been able to respond to the abovementioned site opportunities and constraints. This option was therefore not considered appropriate.

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

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

In light of the above information, the proposal for warehouse and distribution centre at the subject site would allow for the site and tenant objectives to be suitably met.

PART 4 STATUTORY CONTEXT

4.1 CONTROLS AND POLICIES OVERVIEW

This part of the EIS aims to highlight and address the relevant statutory requirements that are related to the proposed development, as noted below. Whilst other statutory documents have been considered in the preparation of this EIS, only those with specific triggers/requirements that relate to the proposed development have been documented.

Commonwealth Planning Context

- *Commonwealth Environment Protection and Biodiversity Conservation Act 1999*

State Planning Context

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2021*
- *Biodiversity Conservation Act 2016*
- *National Parks and Wildlife Act 1974*
- *Protection of the Environment Operations Act 1997*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *State Environmental Planning Policy (Industry and Employment) 2021*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *State Environmental Planning Policy (Planning Systems) 2021*
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021*

Local Planning Context

- *Bankstown Local Environmental Plan 2015*
- *Bankstown Development Control Plan 2015*

This proposal has been carefully assessed against the requirements and objectives of all of the above planning statutory and policy documents, as detailed within this EIS.

4.1.1 Statutory Requirements

The following categories are used to identify the statutory requirements of the project.

TABLE 13: STATUTORY REQUIREMENTS OVERVIEW	
Power to grant approval	In accordance with Schedule 1 of the Planning Systems SEPP, development that has a CIV of more than $30 million for the purpose of a warehouse or distribution centre, constitutes SSD. As noted in **Section 1.5** of the EIS, the CIV of the proposed development is in excess of $30 million. The power to grant approval lies with the Minister for Planning (NSW DPE) as the consent authority for SSD, pursuant to Section 4.5 of the EP&A Act.
Permissibility	The subject site is zoned IN1 General Industrial, under the *Bankstown Local Environmental Plan 2015* (BLEP2015). The proposed development aligns with the definition of 'warehouse or distribution centres', which is permitted with consent in the IN1 General Industrial zone.

	Pursuant to the *Standard Instrument – Principal Local Environmental Plan*, a warehouse or distribution centre is defined as follows: ***warehouse or distribution centre*** *means a building or place used mainly or exclusively for storing or handling items (whether goods or materials) pending their sale, but from which no retail sales are made, but does not include local distribution premises.* This proposal includes buildings that will be used mainly or exclusively for storing or handling items (whether goods or materials) pending their sale, but from which no retail sales are made, and does not include a local distribution premises.
Other approvals	Consistent approvals: N/A Other approvals: Post approval, there will be a Section 138 Roads Act Approval for the vehicular cross-over works within the Horsley Road reserve area.
Pre-condition to exercising power to grant approval	Pre-conditions to exercising the power to grant approval are outlined in **TABLE 14** below.
Mandatory matters for consideration	Mandatory matters of consideration by the consent authority are outlined in **Appendix C** of this EIS.

4.1.2 Pre-conditions

TABLE 14 outlines the pre-conditions to exercising the power to grant approval which are relevant to the project and the section where these matters are addressed within the EIS.

TABLE 14: PRE-CONDITIONS OVERVIEW			
Statutory Reference	**Pre-condition**	**Relevance**	**Addressed in EIS**
State Environmental Planning Policy (Resilience and Hazards) 2021	**Remediation of land:** The consent authority must not grant consent unless (as stipulated by Clause 4.6 of the SEPP): *(a) it has considered whether the land is contaminated, and* *(b) if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and* *(c) if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be*	Detailed site investigations of the subject site have identified that remediation is required to make the land suitable for the proposed development.	Refer to **Section 6.1.16** of this EIS.

	remediated before the land is used for that purpose.		
State Environmental Planning Policy (Industry and Employment) 2021	**Signage generally:** Pursuant to Clause 3.6 of the Industry and Employment SEPP, a consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied: *(a) that the signage is consistent with the objectives of this Chapter as set out in section 3.1(1)(a), and* *(b) that the signage the subject of the application satisfies the assessment criteria specified in Schedule 5.*	The proposed development involves the provision of signage, requiring consideration of the Industry and Employment SEPP.	Refer to **Section 6.1.4** of this EIS.
State Environmental Planning Policy (Transport and Infrastructure) 2021	**Development likely to affect an electricity transmission or distribution network:** Pursuant to Clause 2.47 of the Transport and Infrastructure SEPP, before determining the application the consent authority must — *(a) give written notice of the application to the electricity supply authority for the area in which the development is to be carried out, and* *(b) take into consideration any response to the notice that is received within 21 days after the notice is given, and* *(c) be satisfied that any safety risks associated with the development or modification to which the application relates have been identified, and* *(d) take those risks into consideration.*	The proposed development involves works within 5m of an existing exposed overhead electricity power line along Horsley Road.	Refer to **Section 6.1.21** of this EIS.
	Traffic-generating development: Pursuant to Clause 2.112 of the Transport and Infrastructure SEPP, before determining the application the consent authority must — *(a) give written notice of the application to TfNSW within 7 days after the application is made, and* *(b) take into consideration—*	The proposal involves a warehouse and distribution centre with a site area greater than 8,000m^2, which constitutes traffic-generating development, as described in Schedule 3 of the	Refer to **Section 6.1.6** of this EIS.

	(i) any submission that RMS provides in response to that notice within 21 days after the notice was given (unless, before the 21 days have passed, TfNSW advises that it will not be making a submission), and *(ii) the accessibility of the site concerned, including—* *(A) the efficiency of movement of people and freight to and from the site and the extent of multi-purpose trips, and* *(B) the potential to minimise the need for travel by car and to maximise movement of freight in containers or bulk freight by rail, and* (iii) *any potential traffic safety, road congestion or parking implications of the development.*	Transport and Infrastructure SEPP.	
State Environmental Planning Policy (Biodiversity and Conservation) 2021	Pursuant to Clause 2.10(2) of the Biodiversity and Conservation SEPP, a permit cannot be granted to clear native vegetation in any non-rural area of the State that exceeds the biodiversity offsets scheme threshold.	A Biodiversity Development Assessment Report has been prepared by écologique, which determines that the proposed native vegetation clearing (of 0.009ha) does not exceed the biodiversity offsets scheme threshold.	Refer to **Section 6.1.9** of this EIS.
Bankstown Local Environmental Plan 2015	**Flood Planning:** Pursuant to Clause 5.21 of the BLEP2015, development consent must not be granted unless the consent authority is satisfied the development — *(a) is compatible with the flood function and behaviour on the land, and* *(b) will not adversely affect flood behaviour in a way that results in detrimental increases in the potential flood affectation of other development or properties, and*	Review of the Council's Flood Letters and Council's online Stormwater and Flood Maps indicate there is no flooding in the 1% AEP local events, but some flooding in the PMF event. The requirements of Council and NSW Floodplain Development Manual are addressed and met	Refer to **Section 6.1.14** of this EIS.

	(c) will not adversely affect the safe occupation and efficient evacuation of people or exceed the capacity of existing evacuation routes for the surrounding area in the event of a flood, and *(d) incorporates appropriate measures to manage risk to life in the event of a flood, and* *(e) will not adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses.*	for the proposed development.	
	Earthworks: Pursuant to Clause 6.2 of the BLEP2015, in deciding whether to grant development consent for earthworks (or for development involving ancillary earthworks), the consent authority must consider the following matters— *(a) the likely disruption of, or any detrimental effect on, drainage patterns and soil stability in the locality of the development,* *(b) the effect of the development on the likely future use or redevelopment of the land,* *(c) the quality of the fill or the soil to be excavated, or both,* *(d) the effect of the development on the existing and likely amenity of adjoining properties,* *(e) the source of any fill material and the destination of any excavated material,* *(f) the likelihood of disturbing relics,* *(g) the proximity to, and potential for adverse impacts on, any waterway, drinking water catchment or environmentally sensitive area,* *(h) any appropriate measures proposed to avoid, minimise or mitigate the impacts of the development.*	Earthworks are proposed as part of this development application, requiring consideration of Clause 6.2 of the BLEP2015.	Refer to **Section 6.1.12** of this EIS.

PART 5 ENGAGEMENT

An application to receive Industry-specific SEARs was submitted to NSW DPE, with the SEARs (reference: SSD-45998963) subsequently issued on 12 July 2022.

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

As required by item 25, project specific consultation was required with the following stakeholders:

- the relevant Department assessment team;
- the relevant local Councils;
- any relevant agencies;
- the community; and
- if the development would have required an approval or authorisation under another Act but for the application of s4.41 of the EP&A Act or requires an approval or authorisation under another Act to be applied consistently by s4.42 of the EP&A Act, the agency relevant to that approval or authorisation.

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

A Stakeholder Engagement Plan (located in **Appendix 28** of this EIS) has been prepared by HillPDA, in support of this application, offering a summary and analysis of all community and stakeholder consultations, distilling into themes, and those items identified in the consultation process, as significant.

This information is articulated within **Section 6.1.25** of this EIS, demonstrating that genuine consultation has already taken place with stakeholders, seeking feedback on the proposed development, in line with the NSW DPE's *Undertaking Engagement Guidelines for State Significant Projects*.

PART 6 ASSESSMENT OF IMPACTS

6.1 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

The SEARs (reference: SSD-45998963), issued by the NSW DPE on 12 July 2022, identify the following key issues and assessment requirements for the EIS:

1. Statutory Context
2. Capital Investment Value and Employment
3. Design Quality
4. Built Form and Urban Design
5. Visual Impact
6. Traffic, Transport and Accessibility
7. Trees and Landscaping
8. ESD
9. Biodiversity
10. Air Quality
11. Noise and Vibration
12. Ground and Water Conditions
13. Stormwater and Wastewater
14. Flooding Risk
15. Hazards and Risks
16. Contamination and Remediation
17. Waste Management
18. Aboriginal Cultural Heritage
19. Environmental Heritage
20. Social Impact
21. Infrastructure Requirements and Utilities
22. Bush Fire Risk
23. Construction, Operation and Staging
24. Contributions and Public Benefit
25. Engagement

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

6.1.1 Statutory Context

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

In response to item 1 Statutory Context of the SEARs, **TABLE 15** specifies the location of each assessment of the relevant statutory and strategic documents.

TABLE 15: STATUTORY CONTEXT REVIEW	
Document	**Response / Location of Assessment**
Address all relevant legislation, environmental planning instruments (EPIs) (including drafts), plans, policies and guidelines.	Refer to **PART 4** of this EIS.
Identify compliance with applicable development standards and provide a detailed justification for any non-compliances.	Refer to **Appendix C** of this EIS.
If the development is only partly State significant development (SSD) under clause 8(1) of the State and Regional Development SEPP, provide an explanation	**N/A** – the proposal is wholly SSD.

of how the remainder of the development is sufficiently related to the component that is SSD.	
Address the requirements of any approvals applying to the site, including any concept approval or recommendation from any Gateway determination.	Refer to **Section 2.1.2** of this EIS.

6.1.2 Capital Investment Value and Employment

As required by item 2 Capital Investment Value and Employment of the SEARs, details of CIV and employment numbers associated with the proposal have been calculated.

Reference should be made to **Section 1.5** and **Section 1.6** of this EIS.

6.1.3 Design Quality

The proposed development achieves good design in accordance with the seven (7) objectives for good design in *Better Placed*, as addressed below and documented in SBA Architect's Design Report (**Appendix 5**).

1. Better Fit

Sitting within an IN1 General Industrial zone, the proposed development is heavily informed by its local character by taking design cues from other buildings of similar bulk and scale. Due to the industrial nature of the surrounding context, the proposed development will have minimal adverse impact to the neighbouring buildings and is functionally appropriate for its location.

The 'fit' of the proposal is further articulated through the visual analysis provided within **Section 6.1.5** of this EIS.

2. Better Performance

The proposed development employs a series of ESD initiatives, as described within **Section 6.1.8** of this EIS. In addition, the east-west axis works with the large roof canopy of the building to allow for the inclusion of a large solar array area. In addition to this the office facades employ passive heating and cooling strategies by taking advantage of the east west orientation and utilising large louvered blades to capture diffused natural lighting and obstruct direct and unnecessary solar heat gain.

3. Better for Community

The proposal seeks to assist in achieving the strategic intent for the Milperra industrial area as an evolutionary advanced manufacturing, industrial technology, freight and logistics hub anchored by Bankstown Airport which intends to transition into high amenity industrial precinct with greener public domain.

The proposed massing responds to the site by maintaining the existing landscaped vegetation and setbacks for hardstand areas. In addition, due to the limited space the office creates a shared open outdoor space to create an enhanced amenity area for workers and operators of the site.

4. Better for People

The truck movement has been efficiently planned to create a singular directional movement and to minimise crossover with pedestrian movements. This will allow for safe and comfortable passage of pedestrians to the office and warehouse spaces. Studies of the shadow impact have been produced to recognise the resulting shadows of the proposed development and its negligible effect on surrounding areas.

The proposal also addresses all area of DDA compliance by proving appropriate access and amenity, as per AS 1428.1.

5. Better Working

The buildings elevation has been analysed to create an appropriate selection of the materials to fit the given context. Furthermore, the elevations have been investigated in relation to the surrounding urban context to identify a similar scale development to the neighbouring buildings, refer to **Figure 14**.

The design of the proposed development provides flexibility to accommodate an array of potential end users.

6. Better Value

The massing studies give a clear description of the amalgamation of the three existing buildings into one succinct facility. The new development has the potential for ten tenancies adding more activity and occupation to the area. This adds value to the space by enhancing the design and adding more employment opportunity to the facility.

7. Better Look and Feel

The elevations and realistic renders give an indicative representation of the neutral yet well-articulated material palette that breaks up the mass of the building and responds to the surrounding character. Day and night renders have been explored to visualise the aesthetic of the proposed colours and tone, combined with the landscape and lighting, to create and inviting illustration of the development, refer to **Appendix 4**.

The 'look and feel' of the proposal is further articulated through the visual analysis provided within **Section 6.1.5** of this EIS.

6.1.4 Built Form and Urban Design

The sites' location is currently enclosed on all boundaries by existing industrial facilities and is currently occupied by three existing industrial buildings and large open hardstands. The proposal aims to amalgamate the current buildings into a new multi-level development with a shared hardstand that is appropriate for the given scale and character of the surrounding context, as described in **PART 2** of this EIS.

In consideration of the surrounding context, the east elevation holds the most critical view of the street frontage, in response to this importance the proposed development has very little impact to the neighbouring buildings by matching the scale and height profile of the surrounding urban context. Additionally, the warehouse employs an articulation that relates to the height lines of the smaller neighbouring building typologies. The north elevation makes evident the difference in height profile to the adjacent properties across Horsley Road. However, this disconnection is minimised through the street separation, building setback and the inclusion of facade articulation that carries the existing height profile through the site. The west facade of the building matches the height profile of the adjacent lots and carries this through to the street frontage.

In addition to the contextual analysis, the design development process has been informed by the following site-specific design matters:

- Retention of landscape area and vegetation along street frontage.
- Appropriate layout of truck movement with compliant access to and from level 1 hardstand.
- Separation of truck and pedestrian pathway movements.
- Appropriate location of fire services and brigade set down near the entrance to the site.

- Advantageous location of offices to utilise passive solar heating and cooling from the east and west.
- Efficient creation and proposed operation of the shared hardstand between buildings.
- Appropriate introduction of boundary setbacks from surrounding site context, particularly on the north boundary.
- Sufficient inclusion of carparking, motorcycle parking and bicycle parking within the site.
- Creation of open, raised and outdoor office amenity to take advantage of the compact site space.
- Appropriate isolated, central lobby spaces to access both the warehouse and office areas.

Reference should be made to both **Section 3.3.2** and **Appendix 5** for further assessment of the proposed development's urban and bult form design.

6.1.5 Visual Impact

Habit8 Landscape Architecture and Urbanism has prepared a Landscape and Visual Impact Assessment Report for the proposed development, in line with the *Guidelines for Landscape and Visual Impact Assessment (GLVIA) – Third Edition*, which is appended in **Appendix 9** of this EIS.

6.1.5.1 Existing Environment

The existing site context is described in **PART 2** of this EIS.

The subject site's baseline can be described as an existing manufacturing and storage facility. The existing consolidated site has multiple vehicular entry/exit points, a manufacturer and supplier of fire and acoustic rated wall systems, a manufacturer of civil roading construction and road safety products, and large warehouses for storage. The site slopes from south east to north west with a fall of up to 4m.

There are no current statutory designations within the BLEP2015, which attribute landscape or environmental value to the subject site.

Parks and landscape corridors within the subject site's 2km radius include Bankstown Golf Course on the western side, Milperra Reserve on the south western side, Kinch Reserve, Deverall Park and Bankstown Paceways on the north eastern side. The George River runs on the western side.

A local value may be held by some visual receptors with high sensitivity to the site along Horsley Road and passing pedestrians and motorists of medium sensitivity. These views are likely to be based on perceptual aspects such as wildness, tranquillity, land use and green open space. The site is privately owned and therefore does not add any recreational benefit to the community. The character of the adjacent sites is generally IN1 – General Industrial.

6.1.5.2 Assessment of Impacts

Habit8 Landscape Architecture and Urbanism's Landscape and Visual Impact Assessment Report has assessed:

- The sensitivity of existing landscape receptors and the magnitude of change as a result of the proposed development.
- The sensitivity of existing visual receptors and the magnitude of change as a result of the proposed development.
- The significance of the impact on each receptor, which is based on the sensitivity of the location combined with the predicted magnitude of change.

Visual effects are more subjective as people's perception of development varies through the spectrum of negative, neutral and positive attitudes. In the assessment of visual effects, Habit8 Landscape Architecture and Urbanism have exercised objective professional judgement in assessing the

significance of effects and will assume, unless otherwise stated, that all effects are adverse, thus representing the worst-case scenario.

Views at a variety of distances from the site have also been considered, however it is noted that the site is surrounded to the north, east, south and west by IN1 (General Industrial) zoned area. It is expected that the R2 zoned areas (Low Density Residential) south west of these areas, the significance of the visual impact will be negligible/none.

Some facilities at higher elevations on Western Sydney University Bankstown Campus, may experience glimpses towards the development however the magnitude of change for such dwellings is likely to be very low due to the distance from the proposed site and the existing industrial character. The significance of the visual impact from these properties is judged to be negligible.

Key Views:

The symbols and numbering on the following map indicate the locations from viewpoints close to nearby sensitive residential receptors and significant vantage points within the surrounding public domain.

Figure 15 Assessed Viewpoints (Source: Habit8, 2022)

Landscape Impact Assessment:

The sensitivity of the landscape has been assessed within the baseline to be very low. From understanding the development proposals, mitigation and the existing industrial character of adjacent landscape, the receptor of change is considered to be medium and the magnitude of change is judged to be high. There will be some impact to the existing site character from, but the introduction of this development typology is not uncharacteristic of the context in which it will sit. The significance of impact therefore is judged to be minor.

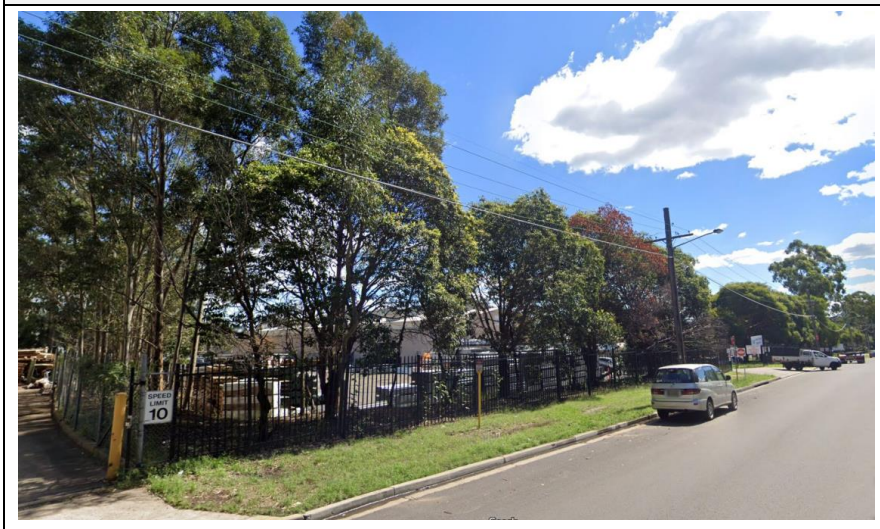
Visual Impact Assessment:

The following table provides a summary of the assessment and findings of Habit8 Landscape Architecture and Urbanism's visual impact assessment.

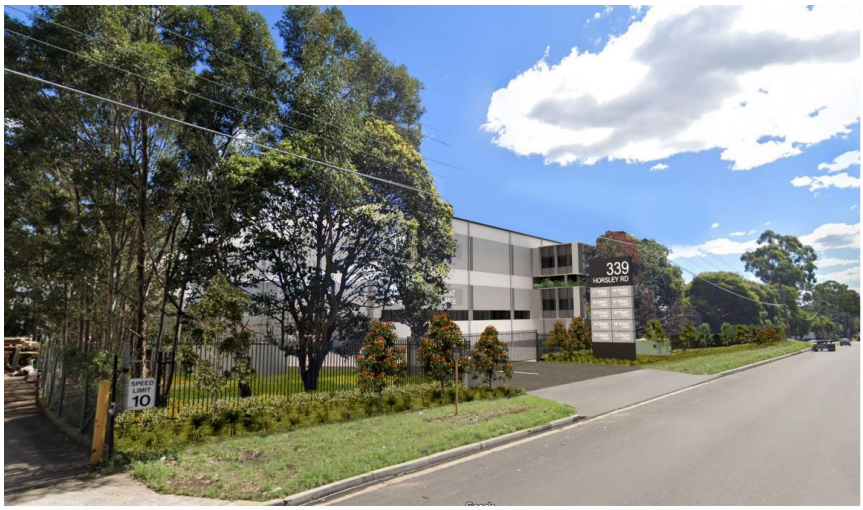
TABLE 16: VISUAL IMACT ASSESSMENT	
Photomontages	**Assessment**
Viewpoint A – Along Bullecourt Avenue in front of Lot 5 (looking north east)	
 **Baseline photo**  **Reference Image (development not visible)**	**Visual Sensitivity:** Very Low **Magnitude of Change:** Very Low **Significance of Impact:** The significance of the impact for adjacent industrial buildings, offices, motorists, cyclists and pedestrians would be negligible / none due to the distance and infill development separating this view and the proposed development and large scattered trees in the foreground.
Viewpoint B – Along Bullecourt Avenue in front of Lot 104 (looking north east)	
 **Baseline Photo**	**Visual Sensitivity:** Very Low **Magnitude of Change:** Very Low **Significance of Impact:** The significance of the impact for adjacent industrial buildings, offices, motorists, cyclists and pedestrians would be negligible / none due to the distance and infill development separating this view and the proposed development and large scattered trees in the foreground.

Reference Image (development not visible)

Viewpoint C – Along Horsley Road in front of Lot 2 (looking north west)



Baseline Photo



0 Years

Visual Sensitivity:

Very Low

Magnitude of Change:

Medium – receptor of change

High – magnitude of change

Significance of Impact:

The Significance of Impact will be Minor. The proposed building is not uncharacteristic to this area and to the streetscape environment. The retention of existing trees and proposed tree planting will form a canopy screen similar and better than the existing buffer of trees.

15 Years

Viewpoint D – Along Horsley Rodd in front of Lot 2 (looking west)

Baseline Photo

0 Years

15 Years

Visual Sensitivity:
Very Low

Magnitude of Change:
Medium – receptor of change
High – magnitude of change

Significance of Impact:
The Significance of Impact will be Minor. The proposed building is not uncharacteristic to this area and to the streetscape environment. The retention of selected existing trees and proposed tree planting will form a canopy screen similar and better than the existing buffer of scattered and sparse trees.

Viewpoint E – Corner of Horsley Road and Armour Street in front of Lot 7 (looking south west)

Visual Sensitivity:
Very Low

Baseline Photo

0 Years

15 Years

Magnitude of Change:

Medium – receptor of change

High – magnitude of change

Significance of Impact:

The Significance of Impact will be Minor. The proposed building is not uncharacteristic to this area and to the streetscape environment. The retention of select existing trees and proposed tree planting will form a canopy screen similar and better than the existing buffer of scattered and sparse trees.

It has been concluded that the significance of the impact upon the landscape at this project development on average to be minor. This is in part due to the surrounding character of the development already being heavily influenced by industrial development.

Views from adjacent industrial properties to the north, west and south of the site shall have views to the proposed development but are to be mitigated with tall native canopy trees, screening shrubs and groundcovers are planted. Following maturity, these planted buffers will provide a dense screen to help to soften and screen the development. The development proposes substantial landscape planting to offset the visual impact in the form of setbacks with dense tree and shrub planting. This will be most effective after 15 years for those receptors who experience direct views.

Passing motorists, cyclists and pedestrians will also experience a medium change in view. However, Horsley Road is not on the major cycleway route and is not a street where walking is encouraged, due to industrial truck movements and the lack of close by services and facilities.

Wider reaching views to the site from residential areas located in the greater landscape south west of the site have also been considered, however the site is too far that makes viewing the site negligible.

6.1.5.3 Management and/or Mitigation Measures

The design of the setbacks recognizes the need to provide significant mitigation to surrounding lots in the form of dense canopy tree planting together with a large shrub and groundcover understory. This should help to soften the appearance of the development from the most highly sensitive receptors. It can be argued that the landscape will be enhanced by the introduction of new landscape setback areas that currently don't exist.

Plating will be most effective, in screening the proposed development, when it reaches maturity at approximately year 10 of the development. Landscaped areas and plantings should be maintained and cared for to ensure they thrive.

6.1.6 Traffic, Transport and Accessibility

Colston Budd Rogers and Kafes has prepared a Traffic and Accessibility Impact Assessment (TAIA), in response to the SEARs, which is appended in **Appendix 10** of this EIS. The following subsections summarise the findings of the TAIA, including:

- details of all traffic types and volumes likely to be generated during construction and operation, including a description of key access and haul routes.
- 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 industry standard modelling).
- plans demonstrating how all vehicles likely to be generated during construction and operation and awaiting loading, unloading or servicing can be accommodated on the site to avoid queuing in the street network.
- details and plans of any proposed internal road network, loading dock provision and servicing, on-site parking provisions, and sufficient pedestrian and cyclist facilities, in accordance with the relevant Australian Standards.
- swept path analysis for the largest vehicle requiring access to the development.
- details of road upgrades, infrastructure works, or new roads or access points required for the development if necessary.

6.1.6.1 Existing Environment

Reference should be made to **PART 2** of the EIS, for details on the strategic context of the site. The following provides an overview of the existing traffic environment, as it relates to the subject site.

Horsley Road, to which the subject site has direct access, provides for one (1) traffic lane and one (1) parking lane in each direction, clear of intersections. It has a 60km/hour speed limit and provides access to industrial properties and the University of Western Sydney, Bankstown Campus. It also forms part of a bus route.

Roads to and from the subject site are, including Ashford Avenue and Horsley Road (north of Bullecourt Avenue), Bullecourt Avenue (between Ashford Avenue and Horsley Road), and Amour Street, are classified for use by B-double vehicles.

In order to determine the existing traffic conditions for the surrounding road network, Colston Budd Rogers and Kafes have undertaken turning moving counts (on 21 June 2022) at the following intersections:

- Ashford Avenue/Bullecourt Avenue;
- Bullecourt Avenue/Horsley Road; and
- Horsley Road/Amour Street.

The results of counts are shown in **TABLE 17**, showing that Bullecourt Avenue and Horsley Road (south of Bullecourt Avenue) carried some 785 to 1,040 vehicles per hour two-way during the morning and afternoon peak hours. Horsley Road (north of Bullecourt Avenue), Ashford Avenue and Amour Street carried lower flows of some 220 to 795 vehicles per hour two-way.

TABLE 17: EXISTING TWO-WAY (SUM OF BOTH DIRECTIONS) PEAK HOUR TRAFFIC FLOWS

ROAD	LOCATION	AM PEAK HOUR (8:00AM – 9:00AM)	PM PEAK HOUR (3:45PM – 4:45PM)
Ashford Avenue	North of Bullecourt Avenue	560	795
	South of Bullecourt Avenue	220	305
Bullecourt Avenue	West of Ashford Avenue	920	960
	West of Horsley Road	935	1,040
Horsley Road	North of Amour Street	230	280
	North of Bullecourt Avenue	320	360
	South of Bullecourt Avenue	785	910
Amour Street	East of Horsley Road	295	315

Observations made during the survey periods indicated that the subject site generated some 15 and 10 vehicles per hour two-way (sum of arrivals plus departures) during the morning and afternoon peak hours respectively. Colston Budd Rogers and Kafes have also counted the traffic generation of the site to which the previous tenants of 349 Horsley Road have relocated. These tenants generated some 25 and 15 vehicles per hour two-way during the morning and afternoon peak hours respectively.

Total traffic generation of the previous uses of the subject site was therefore some 40 and 25 vehicles/hour two-way.

The surveyed intersections have been analysed using the SIDRA computer program for the traffic flows to assess the impacts of the proposed development.

The analysis found that the roundabouts at the intersections of Bullecourt Avenue with Ashford Avenue and Horsley Road operate with average delays for all movements of less than 25 seconds/vehicle during peak periods. This represents level of service B, a good level of service. The unsignalized intersection of Horsley Road with Amour Street operates with average delays for all movements of less than 15 seconds/vehicle during peak periods. This represents level of service A/B, a good level of service.

6.1.6.2 Assessment of Impacts

Operational Parking and Access:

The following table demonstrates a compliant parking scheme for the proposed development.

TABLE 18: PARKING ANALYSIS			
Parking Element	**Rate Requirement**	**Development Requirement**	**Development Proposal**
Bankstown Development Control Plan 2015			
Car parking	1 per 300m^2 for warehouse	109.4 spaces	174 spaces
Accessible parking	1 per 100 car parking spaces	2 spaces	20 spaces
Bicycle parking	No rate	No rate	20 spaces
Draft Canterbury Bankstown Development Control Plan			
Car parking	1 per 300m^2 for warehouse 1 per 100m^2 for ancillary office	97.5 spaces 32.7 spaces	174 spaces
Accessible parking	1 per 50 car parking spaces	3.5 spaces	20 spaces
Bicycle parking	1 per 20 employees	Unknown *	20 spaces
Note: * tenants are not known at this stage, however an estimate of 400 has been used to determine the number of bicycle parking spaces for the facility			

The proposed parking provision is in accordance with the existing and draft Development Control Plans.

The proposed site access is described in **Section 3.3.2.5** of this EIS. The southern driveway will provide for entering cars and trucks. The northern driveway will provide for exiting vehicles. On-site circulation will generally be one-way clockwise.

The proposed development will provide for rigid trucks up to 12.5 metres long, semi-trailers up to 20 metres long and B-doubles up to 26 metres long. Specific tenants are not confirmed at this stage and therefore the mix of vehicles is unknown.

Trucks will access the warehouses on both the ground and upper floor levels. One-way ramps will connect to and from the upper level on the northern and southern sides of the development. Ramp grades will be a maximum of 1:8.5, with 1:16 transitions over 10 metres to appropriately provide for 20 metre semi-trailers and 26 metre B-doubles, in accordance with the Australian Standard for Parking Facilities (Part 2: Off-street commercial vehicle facilities), AS 2890.2:2018.6.4B-doubles will side load, in hardstand areas adjacent to the buildings. Semi-trailers and smaller trucks will be able to reverse into loading areas for each tenancy. All trucks will be able to enter and exit the site in a forward direction.

Vehicle swept paths are included within the TAIA, as appended in **Appendix 10** of this EIS, which demonstrate the suitability of the proposed access arrangement manoeuvrability of vehicles throughout the site.

Operational Traffic Generation:

Surveys undertaken by TfNSW of business parks and industrial estates in Sydney found traffic generation rates of some 0.16 and 0.15 vehicles/hour/100m^2 during weekday morning and afternoon peak hours respectively. These rates are an average of all the Sydney industrial sites surveyed by TfNSW in TDT 2013/04a, including Erskine Park, Helensburgh, Eastern Creek and Riverwood. Based on these rates, the proposed industrial development would have a traffic generation of some 60 vehicles/hour two-way during weekday morning and afternoon peak hours.

The increase in traffic generation as a result of the proposed development would therefore be estimated as 20 to 35 vehicles/hour two-way, compared to the previous uses of the subject site.

The additional traffic has been assigned to the surrounding road network. Existing peak hour traffic flows plus the additional development traffic are shown in **TABLE 19**.

TABLE 19: DEVELOPMENT TRAFFIC + EXISTING TWO-WAY PEAK HOUR TRAFFIC FLOWS					
ROAD	**LOCATION**	**AM PEAK HOUR (8:00AM – 9:00AM)**		**PM PEAK HOUR (3:45PM – 4:45PM)**	
		Exiting	**+ Proposal**	**Exiting**	**+ Proposal**
Ashford Avenue	North of Bullecourt Avenue	560	+10	795	+10
	South of Bullecourt Avenue	220	-	305	-
Bullecourt Avenue	West of Ashford Avenue	920	+20	960	+20
	West of Horsley Road	935	+30	1,040	+30
Horsley Road	North of Amour Street	230	-	280	-
	North of Bullecourt Avenue	320	+30	360	+30
	South of Bullecourt Avenue	785	-	910	-
Amour Street	East of Horsley Road	295	+20	315	+20

The same intersections have been reanalysed with SIDRA to model the anticipated additional development traffic flows, finding that the intersections of Bullecourt Avenue and Ashford Avenue and Horsley Road would continue to operate with average delays for all movements less than 25 seconds/vehicle during peak periods. This maintains a level of service B, a good level of service.

The intersection of Horsley Road with Armour Street would continue to operate with average delays for all movements less than 15 seconds/vehicle during peak periods. This maintains a level of service A/B, a good level of service.

Colston Budd Rogers and Kafes have determined that the road network will be able to cater for the anticipated traffic generation from the proposed development.

Construction Traffic:

A preliminary construction traffic management plan (CTMP) has been prepared by Colston Budd Rogers and Kafes, forming part of the TAIA in **Appendix 10** of this EIS.

During construction, trucks transporting material to and from the site will be accommodated wholly on site, utilising the existing access points via Horsley Road. At no time during demolition, excavation and/or construction will trucks be permitted to park on street.

The CTMP will be refined once a builder has been appointed and the detailed construction methodology and staging are confirmed. However, based on similar scaled projects, the number of vehicles generated during the various stages of construction is expected to be approximately 30 to 40 construction vehicles per two-way at peak times. Construction vehicles include rigid trucks and articulated vehicles. This is a low traffic generation, equivalent to an average of approximately five (5) trucks per hour over a typical working day. Colston Budd Rogers and Kafes have confirmed that the existing road network can readily cater for these vehicles.

Further details are captured in the TAIA in **Appendix 10** of this EIS.

6.1.6.3 Management and/or Mitigation Measures

A CTMP will be required as part of the Construction Environmental Management Plan (CEMP) for the project, as documented in planned management and mitigation measures described in **Appendix E** of this EIS.

6.1.7 Trees and Landscaping

6.1.7.1 Existing Environment

The subject site currently contains an extensive impervious area, with the following landscaped areas:

- a small, landscaped area located on the eastern boundary of Lot 141, located between the two existing gates;
- landscaped areas on the southern boundary of Lot 140, containing a sloped garden bed in which trees and vegetation have most likely self-sown;
- landscaped areas along the eastern and western boundaries contain cultivated trees, shrubs and lawns.

A total of 107 trees were assessed as part of the Arboricultural Impact Assessment, by Canopy Consulting, which is contained within **Appendix 12** of this EIS. In is noted that these trees were assessed under 96 tree/tag numbers; where trees were similar in size, species, and location and were of lower significance in the landscape, they were grouped together.

A total of eight (8) trees were assessed in adjoining properties.

No trees were observed to possess hollow bearing parts capable of supporting large fauna.

Figure 16 Tree Retention Values and TPZ/SRZ (Source: Canopy Consulting, 2022)

TABLE 20 below provides a summary of the tree observations, as documented by Canopy Consulting.

TABLE 20: TREE OBSERVATIONS	
Matter Considered	**Observations**

Tree Origin Summary	Of the 96 trees/tags, 12 were identified as exotic, 19 as Indigenous, and 65 as native.
Tree Protection Status (under BDCP015)	Of the 96 trees/tags, 85 trees were determined as protected under the BDCP2015, and 11 as exempt.
Tree Significance	Tree significance has been determined using the Tree Significance - Assessment Criteria of the IACA Significance of a Tree, Assessment Rating System (STARS)©, as follows: ▪ 22 trees/tags of high landscape value ▪ 17 trees/tags of medium landscape value ▪ 52 trees/tags of low landscape value ▪ 4 trees/tags being environmental pests / noxious weeds ▪ 1 tree/tag being hazardous / irreversible decline
Retention Value	Retention values has been determined using the Retention Value - Priority Matrix of the IACA Significance of a Tree, Assessment Rating System (STARS) ©, as follows and shown in **Figure 16** below: ▪ 23 trees/tags as a priority for retention ▪ 21 trees/tags to consider for retention ▪ 46 trees/tags to consider for removal ▪ 6 trees/tags as a priority for removal

6.1.7.2 Assessment of Impacts

The following criteria have been considered to determine the impact to site trees that may occur due to the proposed development:

- Existing ground levels (R.L).
- Footprint of the proposed development, temporary structures, and laydown areas.
- Extent of the TPZ / SRZ (structural root zone).
- Incursion into the TPZ including any cut, fill, benching and shoring activities beyond the development footprint.
- Incursions to the tree canopy from the building or temporary structures (scaffolding)
- Existing site and soil conditions.

The impacts of the proposed development are summarised in **TABLE 21**.

TABLE 21: TREE IMPACT ASSESSMENT OVERVIEW

Recommendation	Encroachment Type	Retention Value				Overall Total
		High – priority for retention	Medium – consider for retention	Low – consider for removal	Priority for removal	
Remove	Major	8	11	34	5	58
	Minor	-	-	1	-	1
	Nil	-	-	-	1	-
Removal Total		**8**	**11**	**35**	**6**	**60**
Retain	Major	5	4	3	-	12
	Minor	8	1	-	-	9
	Nil	2	5	8	-	15
Retain Total		**15**	**10**	**11**	**-**	**36**

The proposed development necessitates the removal of 70 trees, as shown in **Figure 8**, of which 11 trees are exempt under the BDCP2015, and two (2) are recommended for removal as they are dead or in poor structural condition.

This leaves a total of 57 trees that require development consent for their removal.

The value of the trees requiring consent for removal are summarised as follows:

- 8 are of high retention value
- 11 are of medium retention value
- 38 are of low retention value – these are attributed to 34 tags in the Arboricultural Impact Assessment Report (**Appendix 12**)

In addition, a total of 13 trees under 12 tag numbers will also be subject to a major TPZ encroachment for bulk earthworks in the south-eastern corner, southern boundary, and south-western corner of the subject site.

However, it is anticipated that these trees will remain viable subject to project arborist supervision during the bulk earthworks stage, including fill, grading and kerb edging, largely due to the existing health of the trees, likelihood of root grafting and already mulched garden bed areas in which they are located.

A tree protection management plan is included in **Appendix B** of this EIS.

To offset the impacts to trees, a site-wide landscape plan has been prepared and included within **Appendix 11** of this EIS.

In line with the NSW Government Architect's Greener Places Framework, the proposed development has been designed to be a high performing, multi-functional landscape which seeks to maintain existing landscape features (where possible). Through its design considerations the proposal has managed to retain 37 trees on site, particularly within the Horsley Road streetscape area.

The retention of existing trees and proposed tree planting will form a canopy screen similar and better than the existing buffer of trees.

The resulting landscape characteristics of the proposed development include:

- A total of 183 trees; and
- A total canopy cover of 3,809m^2 (11.29% of the site area).

6.1.7.3 Management and/or Mitigation Measures

TPZ encroachments should be offset and mitigated using a range of possible measures to ensure impacts are minimised and therefore trees remain viable post construction. Mitigation measures should be increased relative to the level of encroachment within the TPZ.

AS 4970-2009 outlines the types of TPZ encroachment and mitigation measures required to ensure long term viability which are summarised in **TABLE 22**.

TABLE 22: TREE IMPACT MITIGATION MEASURES

Encroachment Type	Mitigation Measures
Nil	▪ Where indirect or inadvertent encroachments may occur due to haul routes or machinery movement tree protection should be installed.

Minor	▪ The area lost to encroachment must be offset elsewhere and contiguous to the TPZ. ▪ Detailed root investigations should not be required. ▪ Tree protection must be installed and maintained.
Major	▪ The Project Arborist must demonstrate the tree(s) will remain viable. ▪ Root investigations using non-destructive methods may be required to clarify or confirm the impacts to trees to be retained. ▪ The area lost to encroachment must be offset elsewhere and contiguous to the TPZ. ▪ All works and excavations within the TPZ must be supervised by the Project Arborist. ▪ Tree protection must be installed and maintained for the duration of the project. ▪ Additional measures such as mulching or temporary irrigation may be required.

These measures are documented in planned management and mitigation measures described in **Appendix E** of this EIS.

6.1.8 Ecologically Sustainable Development

6.1.8.1 Assessment of Impacts

The principles of ESD as outlined in Clause 193 of the EP&A Regulation have been carefully considered in **Section 7.1.5** of this EIS.

The project specific sustainability initiatives include, but are not limited to:

- Space efficient building layout.
- High efficiency electrical systems.
- Large scale on-site renewable energy generation.
- Increased use of daylighting to reduce power usage.
- Installation of a rainwater capture and reuse system for all buildings on-site.
- Energy efficient heating, ventilation and air conditioning including natural ventilation to open spaces.
- Waste minimisation strategies.
- Alignment of Sustainability Strategy to the Green Star Building rating tool.

In addition, the proposal seeks to minimise greenhouse gas emissions (reflecting the Government's goal of net zero emissions by 2050) and consumption of energy, water (including water sensitive urban design) and material resources.

Based on the assessments undertaken by Northrop Consulting (refer to the ESD Report contained within **Appendix 13** of this EIS), the proposed development is estimated to consume 1.49 GWh of energy annually, or equivalent to 1,207 Tonnes of CO2-e annually. This is expected to be offset partially by the planned installation of Photovoltaic Solar generation to the roof of the warehouse spaces.

Overall, through the implementation of the initiatives noted within this report the project clearly demonstrates the site's commitment to ESD principles throughout the design, construction, and operation. Additionally, the project design team has worked to optimise the sites energy performance, address key climate related risks posed to the site, align the project to the NSW Government's commitment to carbon neutrality by 2050, and benchmarked the project to industry best practice sustainability.

6.1.9 Biodiversity

écologique have prepared a Biodiversity Development Assessment Report, as required by the SEARs, in accordance with the requirements of (and information provided under) the current Biodiversity Assessment Method (BAM).

The following subsections seek to summarise the findings of the Biodiversity Development Assessment Report, as appended in **Appendix 14** of this EIS.

6.1.9.1 Existing Environment

Vegetation:

Existing vegetation within the subject land is a mixture of planted native and exotic tree and shrub species, landscaped planter beds and lawns, with small areas of self-seeded local and non-local native species evident along the southern boundary.

Most of the native vegetation within the subject land is of planted origin. The exception being two (2) locations along the southern boundary of the subject land, which include the following:

- Planted and self-seeded species (self-seeded species assumed to have arisen from adjacent plantings); and
- Planted species with colonising growth arising through suckering (i.e., clonal growth).

These areas have been conservatively assessed as native vegetation that have been identified as:

- Cumberland shale plains woodland (PCT 849) – 0.03 ha; and
- Cumberland swamp oak forest (PCT 1800).

Figure 4 shows the extent of each PCT and the location of floristic and site integrity plot/transects undertaken by écologique.

Threatened Species Habitat:

écologique have determined that the subject site does not provide habitat for any threatened species recorded from the locality, due to the following:

- The subject land being in a highly industrialised setting and lack of wildlife corridors to areas within the locality and where threatened species have been recorded from; and
- A lack of habitat features that would support threatened species, such as remnant patches of vegetation that contain native shrub and ground layers, hollow bearing trees, bush rock, large woody debris, and watercourses/drainage lines.

Site surveys of the subject land did not find any incidental sightings or evidence of threatened species (e.g., scats, stick nests, diggings, burrows, scratches/runways on trees, faecal matter). Man-made structures within the subject land were also inspected for evidence of any potential use by threatened birds and microbat species and none detected.

6.1.9.2 Assessment of Impacts

PCTs 849 and 1800 are associated with threatened ecological communities (TECs) listed under both the *Biodiversity Conservation Act 2016* and *Commonwealth Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The initial design of the proposal comprised the following:

- Retention of ten native trees in comparison to 36 native trees that will be retained as a result of the final design; and
- Clearing of 0.15 ha of planted native vegetation compared to 0.40 ha, as a result of the final design.

The final design has reduced the initial clearing of vegetation attributed to PCT 849 from approximately 0.03 ha to 0.009 ha. Thereby demonstrating that the proposed development is to be designed to avoid or minimise direct and indirect impacts on native vegetation, threatened species, threatened ecological communities and their habitat, as required by Section 7.1 of the BAM, as far as practical.

A full assessment of biodiversity impacts has been undertaken by écologique, as documented in **Appendix 14** of this EIS, including identification of:

- any Serious and Irreversible Impacts (SAII); and
- any significant impacts on Matters of National Ecological Significance (MNES).

Impacts on SAII:

The determination of a SAII on biodiversity values is to be made by the consent authority, in accordance with the principles set out in the *Biodiversity Conservation Regulation 2017*. Information is provided in the Biodiversity Development Assessment Report, contained in **Appendix 14** of this EIS, to assist the consent authority in evaluating the extent and severity of the impact from the proposed clearing of planted PCT 849 within the subject site.

The impacts of the proposed development requiring ecosystem credit offsetting includes:

- PCT-849 (Cumberland shale plains woodland) – 1 credit

Impacts on MNES:

Relevant and potential MNES listed under the EPBC Act include both PCTs 849 and 1800.

PCT 849 within the subject land does not meet the criteria for consideration as a MNES, due to its small extent and highly degraded understorey, which doesn't contain perennial native species.

PCT 1800 does not meet the criteria for consideration as a MNES, due to the small extent and highly degraded understorey, which doesn't contain perennial native species.

The subject site does not contain habitat of any importance to threatened and migratory fauna species listed under the EPBC Act.

6.1.9.3 Management and/or Mitigation Measures

The proposal will ensure any direct and indirect impacts on biodiversity are avoided, minimised and mitigated through the implementation of relevant best management practices and subject to the proposal's consent conditions. Relevant best management practices, as they relate to biodiversity are anticipated to include:

- Pre-clearance and clearance procedures to identify, rescue and relocate any resident fauna that may potentially be nesting, roosting or sheltering in areas to be cleared.
- Protection of native vegetation to be retained from construction impacts.
- Sediment and erosion controls to prevent construction impacts on ecosystems downstream of the subject land's stormwater catchment.
- Preventing the introduction or spread of existing weed infestations, pest species, disease or pathogens (or biosecurity risks).

To ensure best practice management, mitigation measures are included within **Appendix E** of this EIS.

6.1.10 Air Quality

An Air Quality Impact Assessment (AQIA) has been prepared by RWDI in accordance with the NSW EPA guideline '*Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (2017)' (Approved Methods), and the IAQM '*Guidance on the Assessment of Dust from Demolition and Construction* (2014)'.

The complete AQIA is included at **Appendix 15** of this EIS.

The assessment methodology includes the modelling of local meteorology and the dispersion of potential emissions from the proposed operations to predict potential air quality impacts on surrounding environment, as summarised below.

6.1.10.1 Existing Environment

To inform the AQIA, a number of existing environmental conditions were assessed including, as documented in **TABLE 23**.

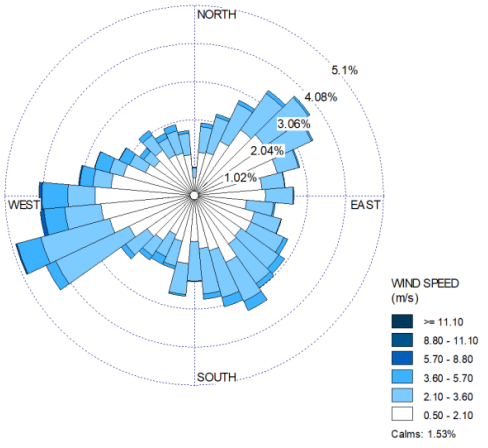
TABLE 23: EXISTING ENVIRONMENT CONDITIONS – AQIA	
Aspect of the Environment	**Description**
Local Meteorology	
Long-term climate	Long term meteorological data for the area surrounding the site is available from the Bankstown Airport AWS operated by the Bureau of Meteorology (BoM). The Bankstown Airport AWS is located approximately 1.5 km north of the Site and records observations of a number of meteorological data include wind speed, wind direction, temperature, humidity, and rainfall. Temperature data recorded at the Bankstown Airport AWS indicates that January is the hottest month of the year, with a mean daily maximum temperature of 28.5˚C. July is the coolest month with a mean daily minimum temperature of 5.2˚C. March is the wettest month with an average rainfall of 115 mm falling over 9 days. There are, on average, 82 rain days per year, delivering 868 mm of rain.
Wind	Wind data from Chullora air quality monitoring station (AQMS) has been incorporated into the dispersion modelling for the AQIA. **Figure 17** and **Figure 18** presents the annual and seasonal wind rose plots for the Chullora AQMS, for the year of 2020. 

Figure 17 Chullora AQMS Annual Wind Roses (Source: AQMS, 2020)

Figure 18 Chullora AQMS Seasonal Wind Roses (Source: AQMS, 2020)

Local Air Quality

Ambient air quality

No site-specific data are available to determine the existing concentrations of air pollutants at sensitive receptors near the subject site. The nearest AQMS measuring the selected pollutants are located approximately 6.64 kilometres north-east of the subject site, at Chullora.

A summary of the ambient air quality monitoring data collected for year 2020 at the Chullora AQMS is presented below.

Pollutant	Averaging Period	Concentration (µg/m³)
Total suspended particulates (TSP)	Annual[1]	51
Particulate matter ≤10 µm (PM_{10})	Annual[2]	21
	24-hour[3]	37
Particulate matter ≤2.5 µm ($PM_{2.5}$)	Annual[2]	9
	24-hour[3]	19
Nitrogen dioxide (NO_2)	Annual[2]	98
	1-hour[4]	17

Note
1. Calculated assuming 40% of the TSP is PM_{10}
2. Average of 1 hour data from the year
3. 95th Percentile of 24-hour values
4. Maximum of 1 hour data from the year

Estimates of the annual average background total suspended particulates (TSP) concentrations can be determined from a relationship between measured PM_{10} concentrations. This relationship assumes that 40% of the TSP is PM_{10} and was established as part of a review of ambient monitoring data

	collected by co-located TSP and PM_{10} monitors operated for reasonably long periods of time in the Hunter Valley (NSW Minerals Council, 2000).
Receiver Environment	
Identified receivers	The immediate context of the subject site contains industrial activities within the IN1 General Industrial zone, as shown in **Figure 7**, with the nearest sensitive receptor (Western Sydney University, Bankstown) identified approximately 370m to the south. To inform the AQIA, the following receivers have been considered, as shown in **Figure 19**. The nearest industrial receivers are located within 350m of the subject site and therefore, an assessment of dust impacts is considered necessary under the guideline.

Receptor	Address	Receiver Type	Distance to Site (m)	UTM Coordinates	
				X	Y
R01	5 Works Place, Milperra	Industrial	77	314521	6243235
R02	319 Horsley Road, Milperra	Industrial	93	314529	6243063
R03	1 Amour Street, Milperra	Industrial	137	314663	6243150
R04	75 Ashford Avenue, Milperra	Industrial	118	314408	6243153
R05	Western Sydney University Bankstown	Educational	376	314059	6242920
R06	Bankstown Golf Club	Active Recreational	537	314359	6242814
R07	10 Bullecourt Avenue, Milperra	Residential	509	313980	6243192
R08	12 Keysor Place, Milperra	Residential	734	313790	6243080

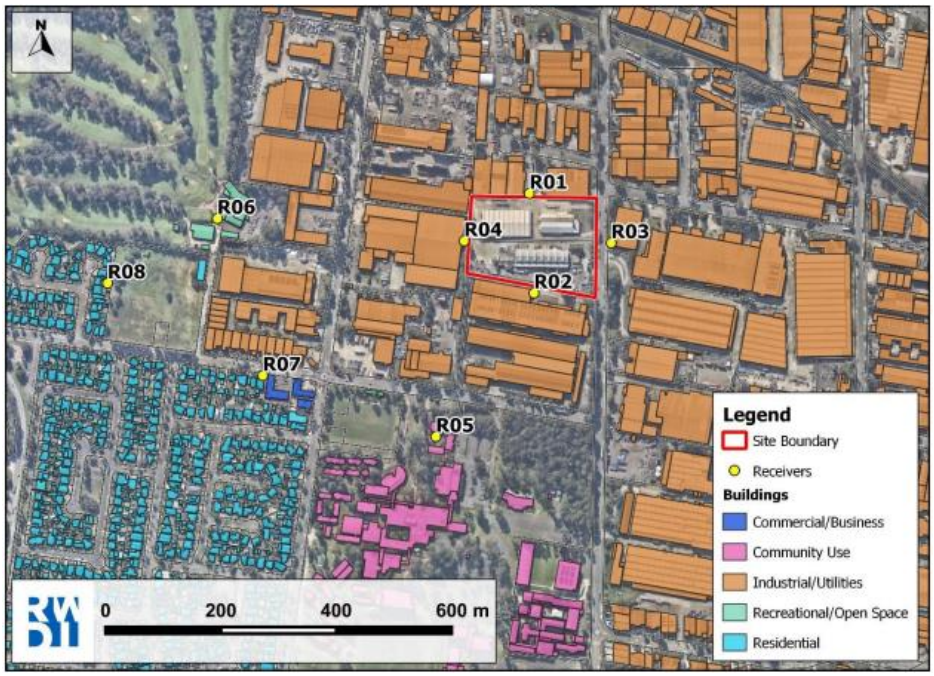


Figure 19 Local of Identified Receivers (Source: RWDI, 2022)

6.1.10.2 Assessment of Impacts

Construction:

For this project, the earthworks phase (and associated trackout) is considered to have the greatest potential to generate short-term high levels of dust.

Based on the dust emissions magnitude for construction works and the sensitivity of the identified receivers, the resulting risk of impacts are identified as follows:

- Earthworks are considered to have a low risk of dust soiling and human health impacts; and
- Haulage activities are considered to have a low risk of dust soiling and human health impacts.

It is important to note that the above risks assume that dust mitigation measures are not implemented.

Operation:

The significant sources of emissions associated with the proposed operations of the subject site are identified as:

- Truck movements on paved roads; and,
- Diesel exhaust from idling vehicles.

No material handling, processing, or stockpiling would occur outside the buildings. Therefore, windblown dust emissions would be negligible.

The dispersion modelling and assessment of the likely off-site air quality impacts concludes the following:

- Predicted concentrations of TSP (incremental and cumulative annual average) at all receivers are compliant with impact assessment criteria, noted in the AQIA.
- The incremental and cumulative 24-hour average PM_{10} concentrations predicted at each surrounding sensitive receptor are below the relevant guideline. Therefore, it is concluded that the proposed operation is unlikely to cause any additional exceedances of the guideline at these locations.
- Predicted concentrations of $PM_{2.5}$ for the annual averaging period are expected to exceed the criterion at all sensitive receptors. This is a result of the elevated background concentration of 8.8 $\mu g/m^3$ which exceeds the criterion without any contribution from the facility. Modelled concentrations from the facility are below 0.03 $\mu g/m^3$ and are not expected to significantly increase existing exceedances due to background.
- The results indicate that predicted incremental concentrations of NO_2 are below the criteria at surrounding receptor locations. Given that NO_x is mostly a mixture of NO_2 and nitric oxide (NO), conversion of NO_x predictions to NO_2 concentrations was conservatively estimated using a total conversion.

The results of the dispersion modelling indicate that most pollutants concentrations due to the operation of the proposal would comply with the established criteria at nearby residential receptors. Although there are predicted exceedances at sensitive receptors for the annual $PM_{2.5}$ criterion, the predicted maximum concentration is dominated by the background concentrations. Operation of the proposal is not anticipated to exacerbate existing elevated background concentrations. Therefore, operation of the Proposal is not expected to adversely affect sensitive receptors.

6.1.10.3 Management and/or Mitigation Measures

The assessment of potential dust impacts from the proposed works indicate that the proposed project will have a low risk of both dust soiling and human health impacts from earthworks haulage (trackout) activities if dust mitigation measures are not implemented. The potential risk for the other stages of

construction will be either low or negligible given that the worst-case scenario (earthworks and associated haulage) has been considered.

To ensure best practice management, mitigation measures are included within **Appendix E** of this EIS to ensure that construction dust impacts remain a low risk.

6.1.11 Noise and Vibration

A Noise and Vibration Impact Assessment (NVIA) has been prepared by RWDI in accordance with the NSW EPA guideline '*Noise Policy for Industry* (2017)' (NPfI), '*Road Noise Policy* (2011)' (RNP) and the '*Interim Construction Noise Guideline* (2009)' (ICNG).

The complete NVIA is included at **Appendix 16** of this EIS.

6.1.11.1 Existing Environment

To inform the NVIA, a number of existing environmental conditions were assessed including, as documented in **TABLE 24**.

TABLE 24: EXISTING ENVIRONMENT CONDITIONS – NVIA

Aspect of the Environment	Description
Receiver Environment	
Identified receivers	The immediate context of the subject site contains industrial activities within the IN1 General Industrial zone, as shown in **Figure 7**, with the nearest sensitive receptor (Western Sydney University, Bankstown) identified approximately 370m to the south. To inform the NVIA, the same receivers have been assessed as done for the AQIA and documented in **TABLE 23** and **Figure 19** above.
Noise Environment	
Background noise levels	Unattended noise monitoring was conducted between 21 June and 30 June 2022 by RWDI. The measured data was processed according to the NPfI requirements. The noise monitor was installed at the rear of 18 Bullecourt Avenue, Milperra. The following details the L_{A90} presented as Rating Background Level (RBL) logged during the daytime, evening, and night periods. RBL data affected by adverse meteorological conditions or extraneous noise was removed from the data prior to processing. Full noise monitoring plots are provided in the NVIA. **Location** / **Time Period[1]** / **RBL** **L01** – Day – 45 **L01** – Evening – 45 **L01** – Night – 39 Note 1: Daytime (6am – 7pm), Evening (7pm – 10pm), and Night time (10pm – 6am).
Road traffic noise levels	Attended noise monitoring was completed at the front of 18 Bullecourt Avenue, approximately 5 m from the nearest lane, to determine the existing road traffic noise levels. Monitoring was completed by RWDI at 3.00pm on 21 June 2022. The following presents the measured road traffic noise levels at the monitoring location.

Date Time	L_{Amax}	L_{Aeq}	L_{A90}	Comments
20 June 2022 3.00pm-3.15pm	91	73	58	Truck drive bys approximately 79-85 dBA Car drive bys approximately 70-80 dBA Lulls in traffic, SPL between 52-60

The measured noise levels at the unattended noise monitor were compared, with the attended noise monitoring, to estimate the $LA_{eq,15hr}$ and $LA_{eq,9hr}$ for traffic noise assessment, as presented below.

Location	Noise Level	
Attended 21 June 2022, 3.00pm-3.15pm	L_{Aeq} 73 dBA	
Unattended 21 June 2022, 3.00pm-3.15pm	L_{Aeq} 56 dBA	
Measured at rear 21 June to 30 June 2022	$L_{Aeq,15hr}$ 54 dBA	$L_{Aeq,9hr}$ 50 dBA
Assumed 5 m from nearest lane	$L_{Aeq,15hr}$ 71 dBA	$L_{Aeq,9hr}$ 67 dBA
Assumed at façade 15 m from nearest lane	$L_{Aeq,15hr}$ 66 dBA	$L_{Aeq,9hr}$ 62 dBA

6.1.11.2 Assessment of Impacts

Construction Noise:

All construction works will be carried out during the daytime period only and it is expected that the approval will typically condition standard construction hours. Standard construction hours per the ICNG are typically Monday to Friday 7.00am-6.00pm, and Saturday 8.00am-1.00pm. On this basis and specifically for residences, the construction Noise Management Level (NML) is that the noise should not exceed the RBL by more than 10 dBA.

Construction is proposed to only occur during the standard hours and so only daytime predictions have been completed. For this project, the stages of construction include:

- Stage 1 – Site Clearing, Demolition, and Earthworks – total sound power level of 118 dBA
- Stage 2 – Concrete Works – total sound power level of 115 dBA
- Stage 3 – Building Construction – total sound power level of 114 dBA

Predictions assume a "typical worst-case" scenario whereby all the plant is running continuously. As such, the impact predictions represent the likely noise levels that would occur during intensive periods of construction. The presented noise levels can be considered in the upper range of noise levels that can be expected at surrounding receivers when the various construction stages occur.

Based on the above, resultant noise levels at receivers have been predicted, and documented in the NVIA, demonstrating that construction noise levels are expected to comply with the relevant NMLs at all representative receivers.

Construction Vibration:

Vibration intensive works that may occur during the proposed works would be limited to the use of pile boring during the concrete works stage. The safe working distances of vibration intensive equipment have been assessed, indicating that the proposed vibration intensive activities are outside of the recommended safe working distances.

Operational Noise:

The emission of noise and potential noise impact from the operation of the proposed development is to be assessed with respect to the site-specific noise trigger levels based on the NPfI. The assessment procedure has two components: intrusiveness and amenity.

The resulting project noise trigger levels (PNTL) are shown in **TABLE 25** below and include the sleep disturbance (screening) levels).

TABLE 25: PROJECT NOISE TRIGGER LEVEL, dBA

Noise Amenity Area	Time of Day	PNTL	Noise Descriptor
Residential	Day	50	$L_{Aeq,15min}$
	Evening	43	$L_{Aeq,15min}$
	Night	38	$L_{Aeq,15min}$
	Night	54	L_{AFmax}
Industrial	When in use	68	$L_{Aeq,15min}$
Education	Noisiest 1-hour period when in use	45 [1]	$L_{Aeq,1hr}$
Active Recreation	When is use	53	$L_{Aeq,15min}$

Note [1]: The NPfI provides an internal noise limit of 35 dBA. It has been conservatively assumed that a 10 dBA reduction would be expected from a partially open window thus resulting in an external limit of 45 dBA

Noise sources including onsite vehicle movements (including airbrakes and reversing alarms), forklift operation and internal warehouse activity have been modelled throughout the development, from both ground and second storey sources. As details of specific items and exact usage of warehouse facilities are not yet known, a conservative approach to modelling has been conducted. The following noise level data for vehicle-related noise sources has been used for the assessment. The modelled noise levels have been taken from RWDI's internal database and external assessments of similar subject sites.

The following noise sources have been modelled as part of the NVIA:

- Forklift operational on hardstand – sound power level of 93 dBA;
- Light Vehicles on site, up to speed of 40 km/h – sound power level of 90 dBA;
- Heavy Vehicle @ 25 km/h – sound power level of 106 dBA;
- Heavy vehicle, requiring greater engine capacity (i.e. trucks using ramps) @ 5 km/h – sound power level of 111 dBA;
    - Locations where vehicles require greater engine capacity, such as accelerating from a stationary position, cornering, or accessing entry/exit ramps have been modelled;
- Heavy Vehicle, reversing @ 5 km/h – sound power level of 115 dBA;
    - Duration of heavy vehicle reversing is assumed to be not greater than 30 seconds and includes reversing alarm and air-break release events;
- Roof top mechanical plant – sound power level of 80 dBA;
    - Worst case predictions, noting that mechanical plant serving the proposed development will require review to determine potential noise impacts prior to issue of a construction certificate.

Considerations must be made such that the cumulative noise emissions from mechanical plant and other operational noise sources do not exceed the PNTL.

Noise level predictions, as modelled in the NVIA, indicate that the proposed operations will comply with all the relevant PNTLs, as documented in **TABLE 26**.

TABLE 26: PROJECT NOISE TRIGGER PREDICTIONS, $L_{Aeq,15min}$ dBA						
Receiver	**Predicted Noise Level**			**Project Noise Trigger Levels (PNTL)**		
	Standard Met	**Adverse Day/Evening**	**Adverse Night**	**Day**	**Evening**	**Night**
R01	68	68	68	68		
R02	67	67	67	68		
R03	54	54	54	68		
R04	40	40	40	68		
R05	27	28	28	45		
R06	25	26	26	53		
R07	28	29	29	50	43	38
R08	24	25	25	50	43	38

Predicted night time L_{Amax} noise levels have been also been assessed for potential sleep disturbance at the nearest residential receivers, confirming that predictions comply with the screening level of the NPfI.

Road Traffic Noise:

Additional road traffic due to the Project will have the most impact on the residential receivers on Bullecourt Avenue. RWDI has reviewed surveyed existing traffic flow information for the local road network.

RWDI's assessment included in the NVIA indicates that the relative increase in road traffic noise levels from the operation of the Project is 0.2 dBA during the day period and 0.5 dBA during the night period. This increase will be imperceptible to receivers and will have no impact.

6.1.11.3 Management and/or Mitigation Measures

Although operational noise predictions have indicated compliance with the noise trigger levels, the noise mitigation and management measures, included within **Appendix E** of this EIS, should be implemented to ensure noise impacts from the project is minimal.

Likewise, the predicted construction noise levels comply with the NMLs for all receivers. Notwithstanding, the noise mitigation and management measures, included within **Appendix E** of this EIS, should be implemented to minimise and prevent impacts on the surrounding receivers.

Standard recommendations for the mitigation and management of construction vibration are also documented within **Appendix E** of this EIS.

6.1.12 Ground and Water Conditions

6.1.12.1 Existing Environment

Surface Conditions:

Based on the site investigation undertaken by PSM, existing survey plan and the available historical aerial photos, the following surface conditions are noted.

The subject site comprises:

- Three (3) warehouses built in the past few decades, on grade carpark, driveway and some hardstand area.
    - Majority of 349 Horsley Road and the western part of 339 Horsley Road are covered by concrete slab. Several cracks were observed at the surface of the concrete slab surface during the site walkover.
    - The southern and eastern part of 339 Horsley Road is covered by bitumen pavement.
- An approximate 3 to 4 m high retaining wall and batter exists along the southern site boundary.
- An approximate 1 to 2 m high batter exists along part of the western and eastern site boundary.
- Some cut and fill work undertaken on site by previous developments.
- Relatively flat topography in a range between RL 9 m and 12 m across the Site except for the retaining wall and batter existed along the western, southern and eastern boundary of 339 Horsley Road, Milperra.

The subject site is not mapped within any know zones of acid sulfate soils occurrence.

Subsurface Conditions:

The subsurface conditions encountered within the borehole investigations are summarised as follows:

- Pavement – concrete and asphalt
- Topsoil – silty sand
- Fill – varied across the subject site at levels 0.0m to 0.3m below ground:
    - Sand with gravel
    - Clay with gravel trace sand
    - Sandy gravel
- Natural – clay to sandy clay at levels 0.7m to 7.2m
- Bedrock A – siltstone at levels 3.6m to 7.2m
- Bedrock B – various across the subject site at levels 6.6m to 10.0m:
    - Laminite – 70% siltstone and 20 sandstone
    - Siltstone

Groundwater:

The groundwater levels vary across the subject site, ranging from 1.0 to 3.5m below existing ground level (i.e. RL 7.4m to 10.4m).

6.1.12.2 Assessment of Impacts

The majority of the subject site in the proposed development is in fill, which does not intercept the groundwater.

Some localised areas along the southern site boundary are proposed to be excavated up to a 3.5m cut depth to RL 10.0m, where the groundwater may be locally encountered. However, PSM consider that the impact on groundwater profile (e.g. drawdown and seepage) would be minimal, as such no groundwater seepage modelling is required; refer to the Geotechnical Investigation in **Appendix 17** of this EIS for further detail.

6.1.13 Stormwater and Wastewater

6.1.13.1 Existing Environment

The subject site comprises two lots, both with existing industrial facilities with most of the surface being impervious, as shown in **Figure 20**.

Figure 20 Pre-Development Catchment Plan (Source: Costin Roe Consulting, 2022)

The subject site generally grades down from south to north. The highest level is RL 14.0m AHD along the south-eastern boundary. The lowest level on the site is in the northern hardstand at RL 9.21m. Horsley Road, which the site fronts, falls from south (at RL13.70) to north (RL8.90).

The subject site currently has a developed drainage system on each lot that collects stormwater and discharges it to street drainage in Horsley Road.

6.1.13.2 Assessment of Impacts

An integrated water management plan has been prepared by Costin Roe Consulting, for the proposed development, forming **Appendix 19** of this EIS.

The key water cycle management targets that have been adopted in the proposed development as document in **TABLE 27**. Reference should be made to the Civil Engineering Report, prepared by Costin

Roe Consulting, for detailed water cycle management strategy and assessment of impacts of the proposed development.

TABLE 27: WATER CYCLE MANAGEMENT TARGETS

Element	Target	Reference	Proposed response
Stormwater quantity management	Minimise flooding from increased stormwater runoff due to development.	BDCP2015	The intent of this criterion is to reduce the impact of urban development on existing drainage system by limiting post-development discharge within the receiving waters to the pre-development peak, and to ensure no affectation of upstream, downstream or adjacent properties. Attenuation of stormwater runoff from the development is not required. It is noted that the existing site is currently fully developed and does not contain a detention system. As there is no increase in impervious site coverage, peak runoff will not be increased as part of the proposal. As such, the development will not adversely impact flooding upstream or downstream of the property without on-site detention.
Stormwater quality management	Grease and oil interceptor traps to be installed within piped drainage system.	BDCP2015	There is a need to target pollutants that are present in stormwater runoff to minimise the adverse impact these pollutants could have on downstream receiving waters. A series of Stormwater quality improvement devices (SQID's) have been incorporated in the design of the development. The proposed management strategy will include the following measures: ▪ Primary treatment of external areas will be made via an end-of-line Gross Pollutant Trap (GPT). ▪ Some treatment will also be present by provision of rainwater reuse tanks on development sites through reuse and settlement within the tanks.

Flood management	Buildings set 0.5m above the 1% AEP flood level.	NSW Floodplain Development Manual	The proposed development considered flooding and large rainfall events in relation to local runoff and overland flow paths. Consideration to flood requirements has been made per Council Flood Management Policy. The following measures have been incorporated in the design: ▪ All buildings are sited above the PMF flood level. Flooding considerations are further addressed in **Section 6.1.14** below.
Water supply	Reduce Demand on non-potable water uses. Provide 50-70% reduction of non-potable uses.		Water demand reduction / rainwater reuse measures will be provided as part of this development design. Rainwater reuse will be required to reduce demand on non-potable uses by 50-70%. The reduction in demand will target non-potable uses such as toilet flushing and irrigation.
Stormwater management during construction	A construction stormwater management plan and appropriate associated erosion and sedimentation control measures must be described in the environmental assessment for all stages of construction to mitigate potential impacts to surrounding properties.	Landcom Blue Book	A construction stormwater management plan and associated erosion and sediment control measures is proposed based on *Landcom Blue Book* and Council requirements. The management measures take a staged approach from initial site establishment, construction stages and the period between the completion of the proposed infrastructure works and development of site.

6.1.13.3 Management and/or Mitigation Measures

The hydrological assessment shows local post development flows from the site will be consistent with pre-development flows and demonstrates that the site discharge will not adversely affect any land, drainage systems or watercourse as a result of the development. During the construction phase, a Sediment and Erosion Control Plan will be in place to ensure the downstream drainage system and receiving waters are protected from sediment laden runoff.

During the operational phase of the development, a treatment train incorporating the use of an end-of-line GPT is proposed to mitigate any increase in stormwater pollutant load generated by the development. Best management practices have been applied to the development to ensure that the quality of stormwater runoff is not detrimental to the receiving environment.

Based on the assessment undertaken by Costin Roe Consulting, it is concluded that additional mitigation measures are not required to mitigate impact associated with water quantity during operational phase of the proposed development.

6.1.14 Flooding Risk

6.1.14.1 Existing Environment

Council's flood assessment confirms that the subject site is not affected by mainstream flooding in the local 1% AEP flood event. Further, the site is also not affected by flooding in the 1% AEP flood event associated with the Georges River. As documented in **Figure 21**, a small isolated encroachment at the north-west corner of the subject site is categorised as medium flood risk, with no other flood hazards mapped on site. The subject site is also impacted by the PMF, which is understood to be RL 10.30m AHD.

Figure 21 **Council Stormwater System Report – 1% AEP Flood Hazard (Source: Costin Roe Consulting, 2022)**

Council notes in their Stormwater System Report (SSR, WP-SIA-233/2016) that the subject site is affected by an overland flow path for excess stormwater runoff from the upstream catchment to the north of the site. It is understood that the "medium flood risk" area in the site is attributed as an overland flow path identified in the Council SSR.

The existing site levels are between RL 9.80m AHD and RL 11.00m AHD, and the 1% AEP flood level identified in the adjacent site is RL 8.80m AHD. This is around 1.0m below the existing site levels within the site. Further, there is a retaining wall present along the northern and western boundaries of the site that is around 2-3m high.

Given the above, the isolated flood encroachment is considered a function of the modelling, and not considered that overland flow or flooding to be within the subject site, rather a result of the flood modelling fidelity. The subject site is therefore considered to be clear of 1% AEP flooding and clear of overland flow paths, and that any additional modelling to confirm flooding or flood impact are not required for this proposed development.

6.1.14.2 Assessment of Impacts

Part B12 of the BDCP2015 has been considered in the design of the proposed development, which defines a flood planning level (FPL) for business/industrial premises to be at or above the 1% AEP flood level, plus 0.5m freeboard. Though not directly impacts by flooding on-lot, the FPL for the subject site is RL 8.8m AHD (as per the Council SSR), associated with an overland flow path in the adjoining property to the north-west.

The proposed development's minimum building level is at RL 11.05m AHD, which exceeds the required FPL.

The PMF (or extreme event) provides an upper limit of flooding and associated emergency response planning purposes. The subject site is affected by the PMF event from the Georges River, reaching a maximum water level of RL 10.30m AHD.

Overall flood risk for the development and from the development is considered low to negligible. The FFL of the warehouse is proposed to be constructed 2.25m above the Council's specified FPL. Additionally, the site is set above the PMF flood level, provide adequate refuge for land users during an extreme flood event. Therefore, the development meets the current Council flood policy.

6.1.14.3 Management and/or Mitigation Measures

Whilst the proposal is set above the FPL and PMF flood level, an emergency response plan of action should be developed for the subject site, including an on-site response plan that addresses the measures to be undertaken if the thread of a flood is determined to be imminent. A flood evacuation strategy should also be included to that all persons within the facility are familiar with the processes required, should a flood occur.

Such measures are documented within the planned management and mitigation measures in **Appendix E** of this EIS.

6.1.15 Hazards and Risks

The proposal does not seek consent for the storage of any dangerous or hazardous materials, as the proposed development constitutes a speculative warehouse and distribution centre only; no further assessment under Chapter 3 of the *State Environmental Planning Policy (Resilience and Hazards) 2021* (Resilience and Hazards SEPP) is required.

6.1.16 Contamination and Remediation

In line with Chapter 4 of the Resilience and Hazards SEPP assessments have been undertaken to determine if the land is contaminated and if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, the remediation works required before the land is used for that purpose.

The following documents have been procured by JBS&G and summarised in the following subsections:

- Detailed Site Investigation (ref: 63429 / 144655) – **Appendix 20**
- Remedial Action Plan (ref: 63429 / 144656) – **Appendix 21**

6.1.16.1 Existing Environment

Historical potentially contaminated land uses have been identified at the site as associated with its former agricultural and since the 1960s commercial/industrial use, including freight storage and steel material manufacture. Previous and current land uses may have resulted in contamination of soil, groundwater and soil vapour by a range of typical industrial contaminants, including primarily heavy metals, polycyclic aromatic hydrocarbons (PAHs) and petroleum hydrocarbons.

6.1.16.2 Assessment of Impacts

JBS&G have completed a Detailed Site Investigation (DSI), comprising of a limited DSI and data gap assessment. These investigations did not identify concentrations of contaminants of potential concern (COPC) representing a potentially unacceptable risk to human or ecological health. Nevertheless, two (2) underground storage tanks (USTs) and an aboveground storage tank (AST) require removal and potentially impacted soils adjacent the tanks require management.

The findings of previous environmental investigations reported:

- Potential petroleum hydrocarbon impact to soil underlying the associated underground petroleum storage systems (UPSS) (principally in the central and northern portion of the site);
- The need to decommission and remove associated USTs/ASTs as part of the site remediation and redevelopment; and
- Potentially asbestos impacted fill materials underlying existing structures and concrete hardstands proposed to be removed.

The preferred remedial strategy for the site is:

- Decommissioning and removal of petroleum infrastructure including UPSS by excavation and off-site disposal;
- Excavation and validation of hydrocarbon impacted fill/soil and off-site disposal in compliance with waste guidelines; and
- Where Asbestos Containing Materials (ACM) impacted fill materials are identified, excavation and off-site disposal.

The goal for the remediation and/or management of environmental impact, as outlined in the Remedial Action Plan (RAP) contained within **Appendix 21** of this EIS, is to remove unacceptable risks to human populations who will potentially use the site in the future, mitigate constrains on redevelopment, and to undertake remedial works in a manner that best complies with ESD principles.

It is considered that the proposed actions outlined in the RAP conform to the requirements of the *Contaminated Sites Guidelines for the NSW Site Auditor Scheme (3rd Edition)* (EPA, 2017), as they are technically feasible, environmentally justifiable, and consistent with relevant laws policies and guidelines endorsed by NSW EPA.

6.1.16.3 Management and/or Mitigation Measures

It is recommended that the processes outlined in the RAP (JBS&G, 2022) be implemented to ensure the risks and impacts during remediation works are controlled in an appropriate manner.

Subject to the successful implementation of the measures described in the RAP, and the recommendations included in **Appendix E** of this EIS, it is concluded that the site can be made suitable for the intended uses and that the risks posed by contamination can be managed in such a way as to be adequately protective of human health and the environment.

6.1.17 Waste Management

6.1.17.1 Management and/or Mitigation Measures

In accordance with the SEARs, a Waste Management Plan has been developed by JBS&G, forming **Appendix 22** of this EIS. The Waste Management Plan suitably addresses the likely waste streams generated during the works, provide indicative estimations of waste quantities, and propose management, reuse, recycling and disposal procedures during the demolition, excavation, construction and operational works of the redevelopment works within the subject site.

Construction waste:

A variety of waste types are expected be generated during the site preparation and construction parts of the project. It is expected that actual waste quantities and composition will vary depending on outcomes of detailed design, materials specification and construction planning and methods.

Strategies that will be implemented to minimise waste generation and maximise reuse and recycling are outlined below.

A. Avoidance and Reduction of Waste

The demolition, excavation and construction contractor will be required to avoid waste generation, and endeavour to reuse materials where possible, thereby minimising waste generation. During the construction phase, waste generation will be avoided through strategic selection of materials during design and purchasing, considering options to reduce waste generation for the project. This includes consideration of procurement of materials which are prefabricated, use minimal packaging, and are suitable for reuse across the site. Selection of construction materials will also consider the use of recycled items where practicable.

B. Reuse and Recycling

For waste materials onsite, measures to separate waste streams will be implemented. This includes segregating wastes into appropriate dedicated bins or areas for reclamation on site or transportation to a designated recycling facility. Concrete waste and waste rinse water are not to be disposed of at the site and rinse waters are required to be prevented from entering surface waters, including natural and artificial watercourses. If material containing asbestos is identified and cannot be safely removed/encapsulated, off-site disposal is the most appropriate option. The construction contractor will then liaise with a licensed asbestos removalist to determine a suitable disposal facility. Measures for dealing with hazardous waste (asbestos) are outlined in the Waste Management Plan and documented in the within the planned management and mitigation measures in **Appendix E** of this EIS.

C. Treatment and Disposal

Project wastes may require treatment to stabilise them for appropriate disposal to reduce the risk of harm to human health or the environment. These materials are not suitable for reuse or recycling and must be segregated and disposed of via a suitably qualified contractor. Wastes will only be sent to landfill or disposal facilities where the prioritised management methods in the hierarchy cannot be

effectively implemented. The construction contractor will liaise with the local council to determine appropriate disposal locations for potential waste streams.

D. Other Considerations

To ensure waste is not unintentionally tracked off-site, the vehicles or trailers used to transport waste or excavated spoil from the site will be covered before leaving the subject site, to prevent spillage or escape of dust, waste or spoil from the vehicle or trailer. Any mud, splatter, dust and other material that is likely to be released from the wheels, underside or body of vehicles, or plant leaving the site will also be removed through a shaker bay or wash down area prior to leaving the subject site.

Operational waste:

As there are no specific tenants allocated to the proposed warehouses, the Waste Management Plan has been developed utilising estimated indicative waste generation quantities.

TABLE 28: ESTIMATED AVERAGE WASTE AND RECYCLING GENERATION RATES

Premises Type	Number of Premises	Average Waste Generation	Average Recycling Generation
Warehouses	10	10L / day / 100m^2	10L / day / 100m^2
Ancillary offices	10	10L / day / 100m^2	10L / day / 100m^2

From the table above, it is estimated that the facility will produce approximately 1,634L of waste per week (5 working days) for the assumed ten office spaces and 14,624L for the assumed ten warehouse spaces. The amount of recycling estimated per week (5 working days) is approximately 1,634L for the assumed ten office spaces and 14,624L for the assumed ten warehouse spaces. This culminates in a waste generation of approximately 16,258L per week and a recycling generation of approximately 16,258L per week for the assumed site activities.

This current estimate is based on generic office and warehouse/distribution centre uses. It is expected that actual waste quantities and composition will depend on the final activities of the site.

Due to the unknown future occupants of the warehouses located on site, any waste storage systems implemented are subject to change. In the intermediary period between construction completion and occupation of the warehouses it is estimated that a maximum of 50,660L mobile garbage bins (MGB) (or another combination of sizes) will be required for waste storage. Each individual warehouse tenancy has been allotted its own waste storage area. If any of the warehouses are used by a third party, they will be required to provide their own operational waste management plan (OWMP) to ensure any waste is dealt with appropriately.

Strategies that will be implemented to minimise waste generation and maximise reuse and recycling are outlined below.

A. Avoidance and Reduction of Waste

The ongoing site users will be required to minimise waste generation, and endeavour to reuse waste where available. Waste will be avoided through strategic selection of materials during purchasing which takes into account options which may reduce waste generation during ongoing operation of the site. This includes considering procurement of materials which use minimal packaging and are suitable for reuse. Selection of operational materials will also consider the use of recycled items where practicable.

B. Reuse and Recycling

Measures to separate waste streams will be implemented to maximize re-use and recycling. This includes segregating wastes into appropriate dedicated bins or areas for reclamation on site or transportation to a designated recycling facility.

C. Treatment and Disposal

Operational wastes may require treatment to stabilise them for appropriate disposal to reduce the risk of harm to human health or the environment. These materials may not be suitable for reuse or recycling and will be segregated and disposed of via a suitably qualified contractor for the waste stream. Wastes will only be sent to landfill or disposal facilities where the prioritised management methods in the hierarchy cannot be implemented in a cost effective or practical manner. The site manager will liaise with the local council to determine appropriate disposal locations for potential waste streams.

D. Other Considerations

To ensure waste is not unintentionally tracked off-site, the vehicles or trailers used to transport waste or excavated spoil from the site will be covered before leaving the subject site, to prevent spillage or escape of dust, waste or spoil from the vehicle or trailer. Any mud, splatter, dust and other material that is likely to be released from the wheels, underside or body of vehicles, or plant leaving the site will also be removed through a shaker bay or wash down area prior to leaving the subject site.

6.1.18 Aboriginal Cultural Heritage

6.1.18.1 Existing Environment

A search of the Heritage NSW AHIMS database was undertaken on 5 July 2022 (Client Service ID 697638) by Austral Archaeology. The results from the AHIMS search identified 116 previously recorded sites within 5km radius of the subject site. The search indicates that 'Artefacts' are the predominant site type with over 54.3% of known sites belonging to this category. They occur frequency as isolated finds or scatter but are also represented in combination with site features. Maps of site distribution clearly indicate that sites are generally concentrated within landform associated with the George's River.

An archaeological survey was conducted by Austral Archaeology on 16 August 2022 aiming to target landforms of potential and identify and record Aboriginal sites visible on the ground surface. The survey had an effective coverage of 0.01% due to the extensive modification of the study area hampering visibility of the natural ground surface. The entirety of the study area was noted to be completed modified to facilitate the warehouses currently present on both lots. The study area has been entirely levelled and concreted with the only 'natural' landscape consisting of manmade gardens and lawns containing young native plant species.

No archaeological testing was required.

No Aboriginal sites were identified at any point of assessment.

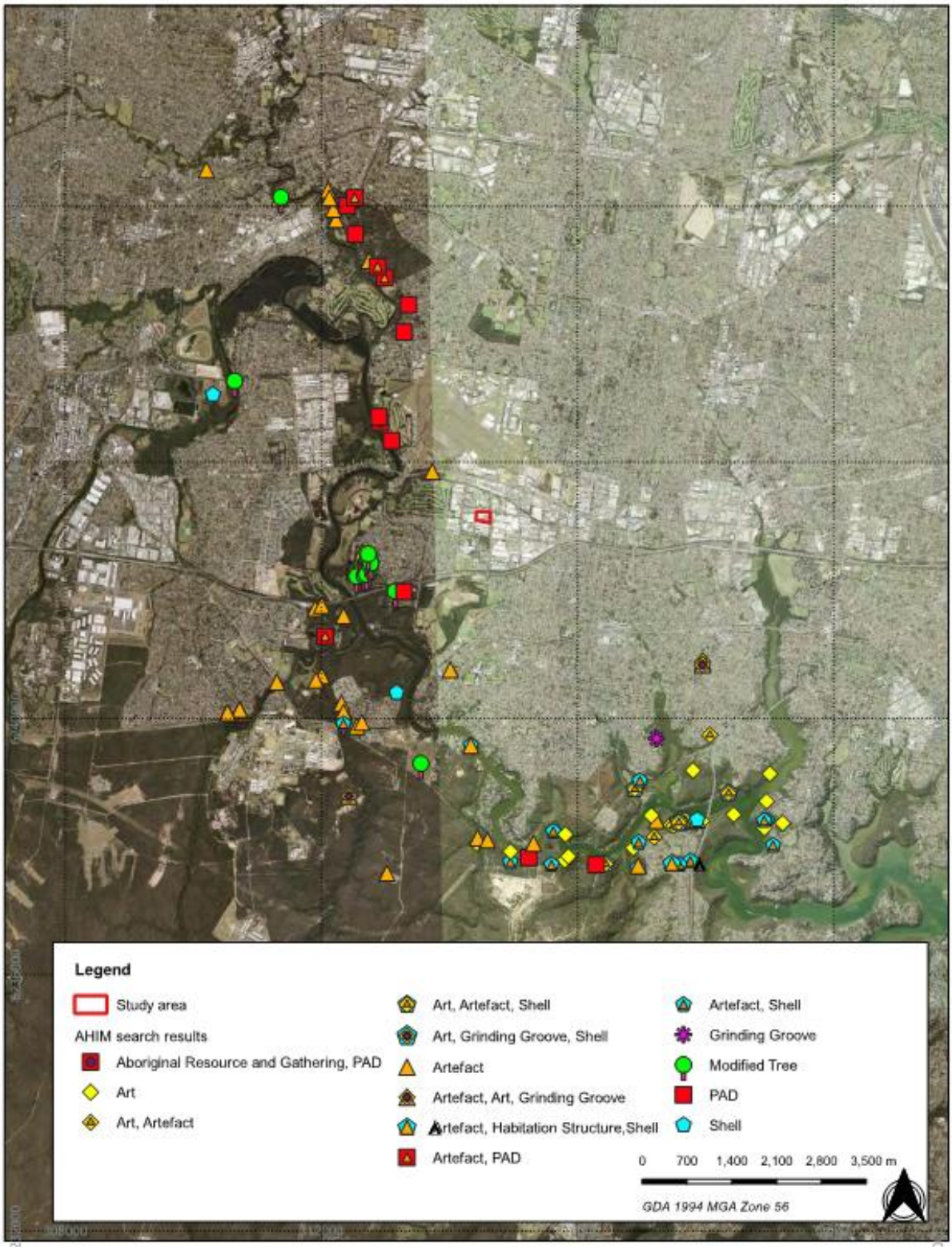


Figure 22 AHIMS within 5 kilometres of the subject site (Source: Austral Archaeology, 2022)

6.1.18.2 Assessment of Impacts

Following the Aboriginal archaeological survey undertaken, by Austral Archaeology, of the subject site it was determined that the entirety of the subject site is considered to be of low archaeological potential to contain Aboriginal cultural heritage and there will be no harm to known heritage values by the proposed works.

Consultation with Aboriginal stakeholders has been completed in accordance with the consultation requirements of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (Department of Environment Climate Change and Water NSW 2010c) (DECCW 2010a). A summary of this process is included below, as documented in **Section 6.1.25** of this EIS.

TABLE 29: ACHAR SUMMARY

Stage	Component	Commenced	Completed	Summary
Stage 1	Letters to agencies	01/06/2022	N/A	In accordance with the Consultation Requirements the following bodies were notified as part of the project proposal: ▪ A response was received from Heritage NSW with a list of stakeholders who may have an interest in the proposed development. ▪ The GLALC responded. ▪ The Local Land Services replied that they had no list of stakeholders who may have an interest in the proposed development. ▪ The Canterbury-Bankstown City Council replied that they had no list of stakeholders who may have an interest in the proposed development. ▪ The National Native Tittle Tribunal replied that they had no list of stakeholders who may have an interest in the proposed development.
	Registration of stakeholders	23/06/2022	07/07/2022	The following groups registered as Aboriginal stakeholders with an interest in this project: ▪ Gandangarra LALC ▪ Kamilaroi Yankuntjatjara Working Group ▪ Didge Ngunawal Clan ▪ B.H. Heritage Consultants ▪ Murra Bidgee Mullangari Aboriginal Corporation ▪ Wori Wooilywa ▪ Guntawang Aboriginal Resources Incorporated ▪ Koori Digs Services ▪ Gunjeewong Cultural Heritage Aboriginal Corporation ▪ Merrigarn ▪ Darug Boorooberongal Elders Aboriginal Corporation

				▪ Corroboree Aboriginal Corporation ▪ A1 Indigenous Services
Stage 2	Project information	15/07/2022	N/A	All registered Aboriginal stakeholders were provided with information outlining the proposed works, including information relating to proposed impacts as well as the project's methodology on 15 July 2022. No commentary was received from Aboriginal stakeholders at this stage of consultation.
Stage 3	Review of project methodology	15/07/2022	13/08/2022	The following four (4) responses were received from Aboriginal stakeholders during this stage: ▪ "I endorse the recommendations made." – Ryan Johnson, Murra Bidgee Mullangari Aboriginal Corporation, 18 July 2022 ▪ "I hold cultural knowledge relevant to determining the cultural significance of Aboriginal objects and values that exist in the project area… We would like you to consider including A1's employees, the Kawalkan workforce and the Women's Circle Employees for all future field work." - Carolyn Hickey, A1 Indigenous Services, 10 August 2022 ▪ "Koori Digs agrees with methodology." - Koori Digs Services, Korri Currell, 17 July 2022 ▪ "We would like to agree to your methodology report and we look forward to furthering consultation" - Kadibulla Khan, Kamilaroi Yankuntjatjara Working Group, 12 August 2022 Kadibulla Khan of Kamilaroi Yankuntjatjara Working Group also noted the significance of waterways located in the Milperra locality due to their provision of abundant floral and faunal resources to past Aboriginal populations, noting their desire to continue the tradition of care for and rejuvenating the country (Khan, 2022). Before surveying the study area, Strini Pillai (Project Manager, GLALC) noted via phone correspondence that

				particular attention should be paid to the natural heritage within the study area. Mature eucalypts within the study area were noted to have already been tagged for preservation purposes and as such no further action is required by Austral.
Stage 4	Review of ACHAR by Aboriginal stakeholders	15/09/2022	13/10/2022	Four registered Aboriginal stakeholders provided a response to the draft ACHAR. Three of the four noted their support for the report, whilst a fourth noted only that any artefacts found on site during construction should be buried in a safe place on site. A copy of the final ACHAR was lodged with all registered Aboriginal stakeholders on 13 October 2022.

6.1.18.3 Management and/or Mitigation Measures

The following recommendations are derived from the findings described in this ACHAR. The recommendations have been developed after considering the archaeological context, environmental information, consultation with the local Aboriginal community, and the findings of the predicted impact of the planning proposal on archaeological resources.

It is recommended that:

1. No further assessment or works are required to be undertaken for the study area. If during the project, unexpected finds or human remains, please follow recommendation 2
2. In the event that unexpected finds occur during any activity within the study area, all works must in the vicinity must cease immediately. The find must be left in place and protected from any further harm. Depending on the nature of the find, the following processes must be followed:
   (a) If, while undertaking the activity, an Aboriginal object is identified, it is a legal requirement under Section 89A of the *National Parks and Wildlife Act 1974* (NPW Act) to notify Heritage NSW, as soon as possible. Further investigations and an AHIP may be required prior to certain activities recommencing.
   (b) If, human skeletal remains are encountered, all work must cease immediately and NSW Police must be contacted, they will then notify the Coroner's Office. Following this, if the remains are believed to be of Aboriginal origin, then the Aboriginal stakeholders and Heritage NSW must be notified.
3. All contractors undertaking earthworks on site should be briefed on the protection of Aboriginal heritage objects under the NPW Act and the penalties for damage to these items.
4. A copy of this report should be forwarded to all Aboriginal stakeholder groups who have registered an interest in the project and to the AHIMS Registrar.

Such measures are documented within the planned management and mitigation measures in **Appendix E** of this EIS.

6.1.19 Environmental Heritage

6.1.19.1 Existing Environment

No part of the subject site is included on any statutory or non-statutory heritage lists. It is, however, in the vicinity of one (1) local heritage item, being the Milperra Soldier Settlement (I29) – 850 metres south-west of the of the subject site.

6.1.19.2 Assessment of Impacts

No further historical heritage assessment is required within the subject site.

6.1.19.3 Management and/or Mitigation Measures

If historical archaeological relics not assessed or anticipated by the Statement of Heritage Impact, prepared by Austral Archaeology (**Appendix 25**), are found during the site works, all works in the immediate vicinity are to cease immediately and the Heritage Division of the Office of Environment and Heritage is to be notified. A qualified archaeologist is to be contacted to assess the situation and consult with the Heritage Division of the Office of Environment and Heritage regarding the most appropriate course of action.

Such measures are documented within the planned management and mitigation measures in **Appendix E** of this EIS.

6.1.20 Social Impact

6.1.20.1 Assessment of Impacts / Mitigation Measures

A robust Social Impact Assessment has been undertaken by HillPDA, as contained within **Appendix 26** of this EIS. A summary of the Social Impact Assessment is included in

Construction:

TABLE 30: CONSTRUCTION PHASE – SOCIAL IMPACT EVALUATION AND MITIGATION RESPONSE			
Detail	**Standard Measures**	**Project-specific Mitigation**	**Residual Impact Significance**
Dust	Construction phase air quality impacts shall be minimised or avoided by incorporation of appropriate dust suppression and air quality control measures at various stages of the project.	Implement the recommended controls from the AQIA.	Unlikely + Minor = Low
Tree clearing	Retain street trees where possible.	Implement the Landscape Plan, increasing the setback plantings and street tree canopy.	Likely + Minor (positive) = Medium (positive)
Noise and vibration	When planning construction work that will generate significant noise or vibration, consider: ▪ Substitution by an alternative process. ▪ Restricting times when work is carried out. ▪ Screening or enclosures.	Implement the recommended controls from the Noise and Vibration Impact Assessment for noise and vibration.	Possible + Minor = Low

	Utilisation of temporary supports where deemed necessary. Carry out demolition activity in accordance with the approved work hours.		
Vehicle movements and access	Manage access to/from adjacent properties. Restrict construction vehicle movements to designated routes to/from the site. Manage and control construction vehicle activity in the vicinity of the site. Provide an appropriate and convenient environment for pedestrians and minimise the impact on pedestrian movements. Maintain appropriate capacity for pedestrians at all times on footpaths adjacent to the site. Maintain appropriate public transport access. Carry out demolition activity in accordance with the approved work hours. Ensure dedicated parking is provided for workers, or that they are encouraged to travel via alternative means (e.g. public transport, shuttle to external parking site).	Implementation of recommended measures from the preliminary Construction Traffic Management Plan.	Unlikely + Minor = Low
Employment	Construction activity will draw resources from and thereby generate economic activity in Canterbury-Bankstown LGA as well as from outside the LGA.	The Cost Summary Report has estimated that construction of the proposal would have a total employment output of 291 jobs per year (the number of full-time jobs of 1 year in length). This would provide incomes and salaries paid to households, much of which would be reinvested into surrounding businesses and, therefore, employees.	Likely + Moderate (positive) = High (positive)
Heritage	Engagement with Local Aboriginal Land Council.	Engagement with the local Aboriginal community undertaken through the Aboriginal Cultural Heritage Assessment (ACHA) enabled the community to provide input into Aboriginal cultural heritage management at the site. Works at the site should implement the recommendations from the ACHA.	Unlikely + Minor = Low

Operation:

TABLE 31: OPERATIONAL PHASE – SOCIAL IMPACT EVALUATION AND MITIGATION RESPONSE			
Detail	**Standard Measures**	**Project-specific Mitigation**	**Residual Impact Significance**
Employment	-	The Cost Summary Report has estimated that operation of the project would generate 556 jobs per year (the number of full-time jobs of 1 year in length) as a conventional warehouse, or 457 jobs per year as a semi-automated warehouse. This would provide incomes and salaries paid to households, much of which would be reinvested into surrounding businesses and, therefore, employees.	Almost certain + Moderate (positive) = High (positive)
Landscaping	-	Implement the Landscape Plan, increasing the setback plantings and street tree canopy, providing 3,200m^2 of landscaped areas.	Likely + Minor (positive) = Medium (positive)
Noise	Locating mechanical equipment as far as practicable from noise sensitive receivers.	The Noise and Vibration Impact Assessment confirmed that operational noise would be within all relevant guidelines, including during night.	Unlikely + Minimal = Low
Demand for child care	-	There are a range of child care facilities near the site, including two within 800m of the site. Any increase in demand would likely be spread around these facilities.	Unlikely + Minimal = Low
Parking availability	Parking is to be provided in line with relevant requirements for the uses on site. Alternative transport options (e.g. cycling) are to be provided facilities in accordance with relevant requirements. Information regarding public transport options is to be made available for workers on site.	The BDCP2015 requires 1 car space per of 300m^2 of gross floor area for warehouse or distribution centres. The proposal would meet these parking requirements. The proposal also provides parking for 20 bicycle parking spaces and 20 motorcycle parking spaces.	Unlikely + Minor = Low
Traffic	Alternative transport options (e.g. cycling) are to be provided facilities in accordance with relevant requirements Information regarding public transport options is to be made available for workers on site.	The TAIA identified that the level of service at nearby intersections would not be materially affected by the increased vehicle movements.	Unlikely + Minor = Low

Passive surveillance	-	The proposal would be constructed and operated to be secure and well-illuminated. 24/7 operations at the site would increase the level of activity in the area outside regular business hours, improving passive surveillance.	Possible + Minimal (positive) = Low (positive)

In summary, potential negative social impacts associated with the proposed development are centred around noise, vibration, and dust impacts for neighbouring premises, reduced parking opportunities for residents and workers, and adverse amenity impacts during the construction of the proposal. However, the social risks from the construction of the proposal were found to be mostly able to be effectively mitigated through the application of appropriate measures. Despite any mitigation measures, reductions in amenity and enjoyment of surroundings associated with the construction phase of the proposal would likely be experienced by workers at neighbouring businesses. This minor social impact would therefore likely occur, should the proposal reach the construction stage.

The proposed development was found to have significant positive social impacts through the creation jobs. Additionally, the construction industry is known to be a significant driver of economic activity and employment, and any expenditure in this industry has flow-on effects to other areas of the economy. The proposal would therefore benefit the wider local and regional economy in this manner.

The proposal would also allow for a more efficient use of an existing industrial site within an established industrial precinct, increasing the potential number of workers in the local area and reducing the need for 'greenfield' industrial land. The additional workers at the site would likely also provide flow-on benefits to other local businesses, providing social benefits the local community.

Therefore, it has been determined that the proposal would have positive social impacts, whilst potential negative social impacts of the proposal can largely be managed with the implementation of appropriate mitigation measures. With consideration of the above potential impacts and benefits, this assessment concludes that the proposal would produce an overall benefit to the social environment.

6.1.21 Infrastructure Requirements and Utilities

6.1.21.1 Existing Environment

The existing service infrastructure is documented in **TABLE 4** and accurately plotted on the detailed site survey, contained within **Appendix 6** of this EIS.

6.1.21.2 Assessment of Impacts

The following table provides an overview of the servicing requirements of the proposed development and any identified impacts to existing infrastructure, as documented by LandPartners in their Service Infrastructure Assessment (**Appendix 27**).

TABLE 32: INFRASTRUCTURE REQUIREMENTS	
Infrastructure service	**Assessment**
Potable water	Sydney Water has confirmed that adequate service is available from the existing 150mm main within Horsley Road, to support the proposed development. Potable water average day demand is estimated at 24kL/day for warehouse/distribution development with associated office facilities. This calculates as a demand of 0.6L/second over a 12-hour working shift.

	This level of demand can be catered by the existing 150mm main in Horsley Road. Reasonable flow and adequate pressure are available from the 150mm main in Horsley Road.
Waste water	Waste water discharge is estimated as 23kL/day or 0.5L/second over a 12-hour work shift; a level of discharge that will be adequately catered for by the existing Sydney Water system.
Electricity	The proponent has engaged a Level 3 ASP Consultant to investigate and design a new electrical connection for the development. Electrical demand for the development has been estimated at approximately 2.0MVa. Sufficient capacity exists within the existing Ausgrid reticulation systems to service the proposed development, with installation of two (2) padmount substations required.
Gas	The subject site is adequately serviced by an existing 1,050kPa high pressure gas main.
Telecommunications	The subject site is adequately serviced by the existing fibre optic system in Horsley Road.

There is expected to be no other impact on existing infrastructure to the site.

6.1.22 Bush Fire Risk

The subject site is not identified as bush fire prone land, nor within the vicinity of bush fire prone land, as such no further assessment is required.

6.1.23 Construction, Operation and Staging

Details of construction, operation and staging are outlined in **Section 3.3** of this EIS.

6.1.24 Contributions and Public Benefit

Pursuant to the *Canterbury Bankstown Local Infrastructure Contributions Plan 2022*, the proposed development will be levied infrastructure contributions at a rate of 1% of the development cost.

Based on the CIV of $90,017,131, a total infrastructure contribution of $900,171.31 would be payable.

6.1.25 Engagement

A detailed engagement plan was developed in consultation with the proponent and in line with the NSW DPE's *Undertaking Engagement Guidelines for State Significant Projects*. It committed to the delivery of a considered, open and evidence-based approach to the engagement. Some key components of the engagement plan are summarised below.

6.1.25.1 Engagement Carried Out

Community stakeholders were divided into two groups according to the level or type of impact from the proposed development.

- Tier 1 stakeholders: those with the potential to be immediately affected by the project
- Tier 2 stakeholders: government agencies and peak organisations whose responsibilities are relevant to the proposed development.

This approach enabled engagement methods to be tailored to each stakeholder group required tailored and appropriate engagement. Details of tier one and two stakeholders are provided in the below. Consultation with stakeholders will also occur as the proposal progresses through the SSD assessment process, including during public exhibition.

TABLE 33: PROJECT STAKEHOLDERS

Stakeholders	Description	Method of Engagement
Tier One	Tier one stakeholders are occupants of the properties neighbouring the proposed development. These stakeholders may experience a range of impacts form the proposed development including noise and disturbance during the construction period. The tier one stakeholder group was comprised of neighbouring industrial and commercial premises surrounding the site, as well as the Western Sydney University's Milperra campus.	Questionnaire survey
Tier Two	Tier two stakeholders include government agencies and peak organisations which may have an interest in the proposed development. Tier two stakeholders are indicated as follows: ▪ Aboriginal and/or Torres Strait Islander communities ▪ NSW DPE ▪ TfNSW ▪ Heritage NSW ▪ NSW EPA ▪ NSW Fire and Rescue ▪ Canterbury-Bankstown Council ▪ Ausgrid ▪ Sydney Water ▪ Telstra ▪ NBNCo ▪ Bankstown Aerodrome (Sydney Metro Airports)	Letters to agencies

A comprehensive table of community engagement is included within **Appendix D** of this EIS, along with a copy of the full engagement Report within **Appendix 28**.

6.1.25.2 Community Views

Survey response – Tier one stakeholders:

The survey of the neighbouring premises (Tier one stakeholders) was conducted between 22 July 2022 and 18 August 2022; a period of 27 days. In total, 70 premises received the letter to occupants and invitation to complete the online survey.

The project's online survey landing page received a total of 84 unique visitors, suggesting that the engagement approach was effective in informing neighbouring premises about the proposed development. Four (4) of these visitors elected to view one or more of the images accompanying the

textual information about the project. Zero users elected to complete the survey or make a submission in relation to the project, suggesting a low level of concern with the proposal.

In addition to the distribution outlined above, Western Sydney University was contacted on 21 July 2022 and 29 July 2022 and provided with an opportunity to input into the engagement. No response was received.

Agency engagement – Tier two stakeholders:

Of the agencies and infrastructure providers consulted, none raised any objection to the proposed development. Infrastructure agencies that responded to HillPDA's request for input suggested that the proposal would be adequately serviced by existing infrastructure. The proponent has responded to feedback from agencies and this is reflected in the EIS documentation. Other agencies suggested that they would provide input on the proposal upon formal exhibition.

A detailed analysis of the key issues arising from the community engagement is included within **Appendix D** of this EIS.

6.1.25.3 Engagement to be Carried Out

Should the proposal be approved, the proponent will continue to engage with surrounding businesses and relevant agencies, as required.

6.2 CUMULATIVE ASSESSMENT

As documented in **Section 2.1.4** of this EIS, no relevant future projects have been identified within the vicinity of the subject site. As such, the following cumulative assessment is based on existing environment with the proposed development impacts considered, where relevant.

6.2.1 Cumulative Visual Analysis

The subject site has been assessed based on the character and context in which it is currently located. It has been concluded that the significance of the impact upon the landscape from the proposed development is minor. This is in part due to the surrounding character of the development already being heavily influenced by industrial development.

6.2.2 Cumulative Traffic Analysis

Additional traffic from the proposed warehouse and distribution centre, as assessed in **Section 6.1.6** of this EIS, has been assigned to the surrounding road network. The road network (existing peak hour traffic flows) will be able to cater for the traffic from the proposed development, without significant impacts.

6.2.3 Cumulative Noise and Vibration Analysis

Given the distance and the proximity of major roadways, operational noise from the proposed warehouse and distribution centre will be inaudible above the prevailing ambient noise at all surrounding residential receivers. Additionally, operational noise emissions to surrounding industrial sites will achieve the amenity level recommended under the NPfI.

As required by the NSW RNP consideration has also been given to the additional traffic generated by the proposal and the potential cumulative impacts resulting from increased traffic on arterial and sub-arterial roads within the vicinity of existing residential areas.

Based upon the estimated traffic projection, the additional traffic generated by the proposed warehouse development will not result in any significant increase in the existing levels of road traffic noise on the road network surrounding the project.

6.2.4 Cumulative Air Quality Analysis

A qualitative assessment of the operational phase was carried out and it was concluded that the impacts of the proposed operation, at residential and industrial/commercial receivers, are likely not to be significant.

With the proposal only involving warehousing and distribution activities, the operations are not considered to contribute to the cumulative emissions for the area.

6.3 PLANNED MANAGEMENT AND MITIGATION MEASURES

Hale Capital Development Management Pty Ltd plans to undertake the construction and operation of the proposed warehouse and distribution centre, in accordance with the planned management and mitigation measures outlined within **Appendix E** of this EIS.

PART 7 JUSTIFICATION OF THE PROJECT

7.1 JUSTIFICATION

The proposed development is justified on environmental, social and economic grounds and is compatible with the locality in which it is proposed. The proposed development would enhance the subject site from an otherwise vacant landholding to a productive employment generating facility.

This EIS is submitted on the following basis.

7.1.1 Supports State, Regional and Local Planning Objectives

The proposed development is consistent with the objectives, provisions and vision contained within *A Metropolis of Three Cities – Greater Sydney Region Plan*; the *South District Plan*; and the *Connective City 2036* (as addressed in **TABLE 7** of this EIS). The proposal would contribute to increased employment generation in an area already earmarked for employment through both State and Regional planning policies.

The subject site forms part of the Milperra industrial area, being identified as the largest employment precinct in the South District, which can be used as a base to leverage the growth of internationally competitive sectors to increase productivity and local jobs for the district.

The *Bankstown Airport Masterplan 2014* sets aside 130 hectares of land adjacent to Milperra for future development for non-aviation uses, with the aim of developing an industrial economic and employment hub. Together with the established Milperra industrial area (within which the subject site is locate)d, this area is well located with access to air transport, the road and rail freight network; the proposed Moorebank intermodal terminal; Liverpool; Bankstown; and the Liverpool health and education precinct. Public transport for workers could improve with the potential expansion of the Sydney Metro City & Southwest from Bankstown to Liverpool.

This proposal aligns with the Planning Priority S10, which aims to retain and manage industrial land, as it seeks to reinvigorate an otherwise dated and rundown industrial site, to cater for the industry advancements and best practice for warehousing and distribution, and associated land uses.

In addition, the need for warehousing and distribution was given a burning platform by changes to business as usual catalysed by COVID-19. The NSW DPE recognises warehouse and distribution centres as a type of development 'well-placed' to support short-term economic recovery from COVID-19. Warehouse and distribution centres were included as one infrastructure asset encouraging investment and job-generating development in NSW DPE's Productivity Acceleration Package.

7.1.2 Demonstrates an Appropriate Use of a Permissible Development

The proposed development would retain and contribute to the growth of new industry for the immediate locale and the wider region. The proposed development would be a highly appropriate and compatible (given its contiguousness to other existing warehousing and industrial developments) response to the strategic goals and objectives of the Milperra industrial area, which all envisage employment-generating land uses at this location.

The permissibility of the subject site for development as a warehouse and distribution centre is prescribed by the BLEP2015, which describes such development as permitted with consent in the IN1 General Industrial zone.

The subject site's consistency with applicable regional and local strategies is demonstrated in the comprehensive environmental assessment, provided in **PART 6** of this EIS, which includes an analysis of all potential impacts, which has been informed by the relevant consultant reports. Accordingly, the

environmental assessment prescribes recommendations and mitigation measures (where necessary), to account for all identified potential impacts, by the proposed development. The suitability of the subject site with regard to the proposed development, can be attributed to its ready ability to provide employment, its excellent access arrangements, its suitable contextual setting, and its minimal impact on the environment.

7.1.3 Minimises Environmental Impacts

Specialist consultants have assessed the potential impacts of the proposed development, determining that it could be undertaken with minimal environmental impacts. The commissioned reports (as listed in **TABLE 1**) have collectively concluded that no significant risk to the locality would result from the proposed development. Where impacts have been identified, these fully-developed strategies are set out in detail for management and mitigation. These measures are described in **Section 6.3** of this EIS.

7.1.4 Creates Compatibility with Surrounding Development

The proposed development is compatible with existing land uses on adjacent lands, all of which provide very similar industrial functions. All are within the immediate vicinity of the proposed development. Detailed investigations undertaken, as part of this application, conclude that no significant environmental cumulative impacts, would occur from the proposed facility.

7.1.5 Delivers Ecologically Sustainable Development

The principles of ESD as outlined in Clause 193 of the EP&A Regulation have been carefully considered in the formulation of this proposal and are addressed as follows:

7.1.5.1 Precautionary Principle

Through the implementation of environmental management and an assessment of the building's operational maintainability, the proposal attempts to incorporate adaptability and resilience into the project design. The concept behind the precautionary principle is to create spaces that can both; accommodate for changes, which may eventuate in the future, and avoid the risk of serious or irreversible damage to the environment.

After careful assessment by both the project team and expert consultants, it is concluded that no unmanageable threat or irreversible damage to the environment, would result from the proposed development.

7.1.5.2 Inter-generational Equity

The project team and expert consultants have examined the overall effects of the proposed development, on both the natural environment and the existing built environment within the vicinity of the subject site.

Through the inclusion of zero ozone depleting refrigerants, best practice PVC and low impact paints, sealants and adhesives, alongside a focus on providing greater vegetation and support for the buildings connection with nature, the project demonstrates a strong commitment to the preservation of environmental health, diversity and productivity of the local area.

This detailed assessment has concluded that no unreasonable use of resources, affectation of environmental processes or prevention of the use of land for future generations would occur from the proposed development. The proposed development would improve the status of the subject site and contribute to the economies of the region through both substantial investment and new employment, thereby improving the inter-generational equity.

7.1.5.3 Conservation of Biological Diversity and Ecological Integrity

Through the planting of native vegetation, improvement of stormwater runoff from the site and use of integrated landscaping, the project will act to improve, conserve and support the local biological diversity and integrity.

The proposal will ensure any direct and indirect impacts on biodiversity are avoided, minimised and mitigated through the implementation of relevant best management practices and subject to the proposal's consent conditions.

7.1.5.4 Improved Valuation, Pricing and Incentive Mechanisms

The proposed development would enable operational efficiencies for the end user, through the provision of tailored design outcomes.

7.1.5.5 Environmental Management

The proposed development implements significant and elaborate measures that avoid, contain and address any possible impacts, through avoidance, better design and management. This is exemplified through the measures, which would be implemented throughout both the construction and operational phases of the proposed development, outlined within **PART 6** of this EIS.

APPENDIX A
SEARS TABLE

HOW THE SEARS HAVE BEEN SATISFIED	
Issue and Assessment Requirements	**Satisfied by**
1. Statutory and strategic context	
▪ Address all relevant legislation, environmental planning instruments (EPIs) (including drafts), plans, policies and guidelines.	Refer to **PART 4** of this EIS.
▪ Identify compliance with applicable development standards and provide a detailed justification for any non-compliances.	Refer to **Appendix C** of this EIS.
▪ If the development is only partly State significant development (SSD) declared under Chapter 2 of SEPP (Planning Systems) 2021, provide an explanation of how the remainder of the development is sufficiently related to the component that is SSD.	**N/A** – the proposal is wholly SSD.
▪ Address the requirements of any approvals applying to the site, including any concept approval or recommendation from any Gateway determination.	Refer to **Section 2.1.2** of this EIS.
2. Capital Investment Value and Employment	
▪ Provide a detailed calculation of the capital investment value (CIV) of the development, prepared by a qualified quantity surveyor.	Refer to **Section 1.5** and **Appendix 2** of this EIS.
▪ Provide an estimate of the retained and new jobs that would be created during the construction and operational phases of the development, including details of the methodology to determine the figures provided.	Refer to **Section 1.6** and **Appendix 2** of this EIS.
3. Design Quality	
▪ Demonstrate how the development will achieve: – design excellence in accordance with any applicable EPI provisions. – good design in accordance with the seven objectives for good design in Better Placed.	Refer to **Section 6.1.3** and **Appendix 5** of this EIS.
▪ Where required by an EPI or concept approval, demonstrate how the development has been subject to a competitive design process or reviewed by the State Design Review Panel (SDRP). Recommendations are to be addressed prior to lodgement.	**N/A** – the proposal is subject to a competitive design process, not is it to be reviewed by the SDRP.
4. Built Form and Urban Design	
▪ Explain and illustrate the proposed built form, including a detailed site and context analysis to justify the proposed site planning and design approach.	Refer to **Section 3.3.2**, **Section 6.1.4**, **Appendix 4**, **Appendix 5** and **Appendix 6** of this EIS.
▪ Demonstrate how the proposed built form (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses and responds to the context, site characteristics, streetscape and existing and future character of the locality.	Refer to **Section 3.3.2**, **Section 6.1.4** and **Appendix 4** and **Appendix 5** of this EIS.
▪ Demonstrate how the building design will deliver a high-quality development, including consideration of façade	Refer to **Section 3.3.2**, **Section 6.1.4** and **Appendix 4** and **Appendix 5** of this EIS.

design, articulation, materials, finishes, colours, any signage and integration of services.	
▪ Assess how the development complies with the relevant accessibility requirements.	Refer to **Section 6.1.4** and **Appendix 7** and **Appendix 8** of this EIS.
5. Visual Impact	
▪ Provide a visual analysis of the development from key viewpoints, including photomontages or perspectives showing the proposed and likely future development.	Refer to **Section 6.1.5** and **Appendix 9** of this EIS.
▪ Where the visual analysis has identified potential for significant visual impact, provide a visual impact assessment that addresses the impacts of the development on the existing catchment.	Refer to **Section 6.1.5** and **Appendix 9** of this EIS.
6. Traffic, Transport and Accessibility	
▪ Provide a transport and accessibility impact assessment, which includes: – details of all traffic types and volumes likely to be generated during construction and operation, including a description of key access and haul routes. – 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 industry standard modelling). – plans demonstrating how all vehicles likely to be generated during construction and operation and awaiting loading, unloading or servicing can be accommodated on the site to avoid queuing in the street network. – details and plans of any proposed internal road network, loading dock provision and servicing, on-site parking provisions, and sufficient pedestrian and cyclist facilities, in accordance with the relevant Australian Standards. – swept path analysis for the largest vehicle requiring access to the development. – details of road upgrades, infrastructure works, or new roads or access points required for the development if necessary.	Refer to **Section 6.1.6** and **Appendix 10** of this EIS.
▪ Provide a Construction Traffic Management Plan detailing predicted construction vehicle movements, routes, access and parking arrangements, coordination with other construction occurring in the area, and how impacts on existing traffic, pedestrian and bicycle networks would be managed and mitigated.	Refer to **Section 6.1.6** and **Appendix 10** of this EIS.
7. Trees and Landscaping	
▪ Provide a detailed site-wide landscape plan, that: – identifies the number and location of trees to be removed and retained, and how opportunities to retain significant trees have been explored and/or informs the plan.	Refer to **Section 6.1.7** and **Appendix 11** of this EIS.

– details the proposed site planting, including location, number and species of plantings, heights of trees at maturity and proposed canopy coverage. – demonstrates how the proposed development would: o contribute to long term landscape setting in respect of the site and streetscape. o mitigate the urban heat island effect and ensure appropriate comfort levels on-site. o contribute to the objective of increased urban tree canopy cover. o maximise opportunities for green infrastructure, consistent with Greener Places.	
8. Ecologically Sustainable Development (ESD)	
▪ Identify how ESD principles (as defined in section 193 of the EP&A Regulation) are incorporated in the design and ongoing operation of the development.	Refer to **Section 6.1.8** and **Appendix 12** of this EIS.
▪ Demonstrate how the development will meet or exceed the relevant industry recognised building sustainability and environmental performance standards.	Refer to **Section 6.1.8** and **Appendix 12** of this EIS.
▪ Demonstrate how the development minimises greenhouse gas emissions (reflecting the Government's goal of net zero emissions by 2050) and consumption of energy, water (including water sensitive urban design) and material resources.	Refer to **Section 6.1.8** and **Appendix 12** of this EIS.
9. Biodiversity	
▪ Assess any biodiversity impacts associated with the development in accordance with the *Biodiversity Conservation Act 2016* and the *Biodiversity Assessment Method 2020*, including the preparation of a Biodiversity Development Assessment Report (BDAR), unless a waiver is granted, or the site is on biodiversity certified land.	Refer to **Section 6.1.9** and **Appendix 14** of this EIS.
▪ If the development is on biodiversity certified land, provide information to identify the site (using associated mapping) and demonstrate the proposed development is consistent with the relevant biodiversity measure conferred by the biodiversity certification.	**N/A** – the subject site is not biodiversity certified land.
10. Air Quality	
▪ Identify significant air emission sources at the proposed development (during construction and operation), assess their potential to cause adverse off-site impacts, and detail proposed management and mitigation measures that would be implemented. Where air emissions during operation have the potential to cause adverse off-site impacts, provide a quantitative air quality impact assessment prepared in accordance with the relevant NSW Environment Protection Authority (EPA) guidelines.	Refer to **Section 6.1.10** and **Appendix 15** of this EIS.
11. Noise and Vibration	
▪ Provide a noise and vibration assessment prepared in accordance with the relevant EPA guidelines. The assessment must detail construction and operational noise and vibration impacts on nearby sensitive receivers and	Refer to **Section 6.1.11** and **Appendix 16** of this EIS.

structures and outline the proposed management and mitigation measures that would be implemented.	
12. Ground and Water Conditions	
▪ Provide an assessment of the potential impacts on soil resources, including related infrastructure and riparian lands on and near the site.	Refer to **Section 6.1.12** of this EIS.
▪ Provide an assessment of the potential impacts on surface and groundwater resources (quality and quantity), including related infrastructure, hydrology, aquatic and groundwater dependent ecosystems, drainage lines, downstream assets and watercourses.	Refer to **Section 6.1.12** and **Appendix 19** of this EIS.
▪ Identify predicted water discharge points to surface/groundwater and consider discharge quality against relevant water quality criteria.	Refer to **Section 6.1.12** and **Appendix 19** of this EIS.
▪ Provide a detailed site water balance including identification of water requirements for the life of the development, and measures to ensure an adequate and secure water supply.	Refer to **Section 6.1.12** and **Appendix 19** of this EIS.
▪ Provide an assessment of salinity and acid sulfate soil impacts.	Refer to **Section 6.1.12** of this EIS.
13. Stormwater and Wastewater	
▪ Provide an Integrated Water Management Plan for the development that: – is prepared in consultation with the local council and any other relevant drainage or water authority. – details the proposed drainage design for the site including any on-site detention facilities, water quality management measures and the nominated discharge points, on-site sewage management, and measures to treat, reuse or dispose of water. – demonstrates compliance with the local council or other drainage or water authority requirements and avoids adverse impacts on any downstream properties.	Refer to **Section 6.1.13** and **Appendix 19** of this EIS.
▪ Where drainage infrastructure works are required that would be handed over to the local council, or other drainage or water authority, provide full hydraulic details and detailed plans and specification of proposed works that have been prepared in consultation with, and comply with the relevant standards of, the local council or other drainage or water authority.	**N/A** – the proposal does not include drainage works that are required to be handed over to Council or the water authority.
14. Flooding risk	
▪ Identify any flood risk on-site having regard to adopted flood studies, the potential effects of climate change, and any relevant provisions of the NSW Floodplain Development Manual.	Refer to **Section 6.1.14** and **Appendix 19** of this EIS.
▪ Assess the impacts of the development, including any changes to flood risk on-site or off-site, and detail design solutions and operational procedures to mitigate flood risk where required.	Refer to **Section 6.1.14** and **Appendix 19** of this EIS.

15. Hazards and Risks	
▪ Where there are dangerous goods and hazardous materials associated with the development provide a preliminary risk screening in accordance with Chapter 3 of SEPP (Resilience and Hazards) 2021.	**N/A** – the proposal does not include the storage of any dangerous or hazardous materials.
▪ Where required by SEPP (Resilience and Hazards) 2021, provide a Preliminary Hazard Analysis prepared in accordance with *Hazardous Industry Planning Advisory Paper No.6 – Guidelines for Hazard Analysis*.	**N/A** – the proposal does not include the storage of any dangerous or hazardous materials.
▪ If the development is adjacent to or on land in a pipeline corridor, report on consultation outcomes with the operator of the pipeline, and prepare a hazard analysis.	**N/A** – the subject site is not adjacent to or on land in a pipeline corridor.
16. Contamination and Remediation	
▪ In accordance with Chapter 4 of SEPP (Resilience and Hazards) 2021, assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable (or will be suitable, after remediation) for the development.	Refer to **Section 6.1.16** and **Appendix 20** and **Appendix 21** of this EIS.
17. Waste Management	
▪ Identify, quantify and classify the likely waste streams to be generated during construction and operation.	Refer to **Section 6.1.17** and **Appendix 22** of this EIS.
▪ Provide the measures to be implemented to manage, reuse, recycle and safely dispose of this waste.	Refer to **Section 6.1.17** and **Appendix 22** of this EIS.
▪ Identify appropriate servicing arrangements for the site.	Refer to **Section 6.1.17** and **Appendix 22** of this EIS.
▪ If buildings are proposed to be demolished or altered, provide a hazardous materials survey.	Refer to **Section 6.1.17** and **Appendix 23** of this EIS.
18. Aboriginal Cultural Heritage	
▪ Provide an Aboriginal Cultural Heritage Assessment Report prepared in accordance with relevant guidelines, identifying, describing and assessing any impacts for any Aboriginal cultural heritage values on the site.	Refer to **Section 6.1.18** and **Appendix 23** of this EIS.
19. Environmental Heritage	
▪ Where there is potential for direct or indirect impacts on the heritage significance of environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (if potential impacts to archaeological resources are identified), prepared in accordance with the relevant guidelines, which assesses any impacts and outlines measures to ensure they are minimised and mitigated.	Refer to **Section 6.1.19** and **Appendix 25** of this EIS.
20. Social Impact	
▪ Provide a Social Impact Assessment prepared in accordance with the *Social Impact Assessment Guidelines for State Significant Projects*.	Refer to **Section 6.1.20** and **Appendix 26** of this EIS.
21. Infrastructure Requirements and Utilities	
▪ In consultation with relevant service providers:	Refer to **Section 6.1.21** and **Appendix 27** of this EIS.

– assess the impacts of the development on existing utility infrastructure and service provider assets surrounding the site. – identify any infrastructure upgrades required on-site and off-site to facilitate the development and any arrangements to ensure that the upgrades will be implemented on time and be maintained. – provide an infrastructure delivery and staging plan, including a description of how infrastructure requirements would be co-ordinated, funded and delivered to facilitate the development.	
22. Bush Fire Risk	
▪ If the development is on bush fire prone land, provide a bush fire assessment that details proposed bush fire protection measures and demonstrates compliance with Planning for Bush Fire Protection.	**N/A** – the subject site is not identified as bush fire prone land, nor within the vicinity of bush fire prone land.
23. Construction, Operation and Staging	
▪ If staging is proposed, provide details of how construction and operation would be managed and any impacts mitigated.	Refer to **Section 6.1.23** of this EIS.
24. Contributions and Public Benefit	
▪ Address the requirements of any relevant contribution plan(s), planning agreement or EPI requiring a monetary contribution, dedication of land and/or works-in-kind and include details of any proposal for further material public benefit.	Refer to **Section 6.1.24** of this EIS.
▪ Where the development proposes alternative public benefits or a departure from an existing contributions framework, the local council, the Department and relevant State agencies are to be consulted prior to lodgement and details, including how comments have been addressed, are to be provided.	**N/A** – the proposal does not seek an alternative arrangement from the existing contributions framework.
25. Engagement	
▪ Detail engagement undertaken and demonstrate how it was consistent with the Undertaking Engagement Guidelines for State Significant Projects. Detail how issues raised and feedback provided have been considered and responded to in the project. In particular, applicants must consult with: – the relevant Department assessment team. – any relevant local councils. – any relevant agencies (including the Western Parkland City Authority for development within the Western Parkland City). – the community. – if the development would have required an approval or authorisation under another Act but for the application of s 4.41 of the EP&A Act or requires an approval or authorisation under another Act to be applied consistently by s 4.42 of the EP&A Act, the agency relevant to that approval or authorisation.	Refer to **PART 5**, **Section 6.1.25** and **Appendix 28** of this EIS.

APPENDIX B
DETAILED MAPS AND PLANS

REGISTER OF PROJECT MAPS/PLANS			
Drawing	**Title**	**Revision**	**Date**
Civil drawings			
C014618.00-SSDA 10	DRAWING LIST & GENERAL NOTES	B	26.08.22
C014618.00-SSDA 20	EROSION & SEDIMENT CONTROL PLAN	B	26.08.22
C014618.00-SSDA 25	EROSION & SEDIMENT CONTROL DETAILS – SHEET 1	B	26.08.22
C014618.00-SSDA 26	EROSION & SEDIMENT CONTROL DETAILS – SHEET 2	B	26.08.22
C014618.00-SSDA 30	BULK EARTHWORKS PLAN	D	16.09.22
C014618.00-SSDA 40	STORMWATER DRAINAGE PLAN – GROUND	D	16.09.22
C014618.00-SSDA 41	STORMWATER DRAINAGE PLAN – LEVEL 1	B	26.08.22
C014618.00-SSDA 42	PRE/POST DEVELOPMENT CATCHMENT PLAN	B	26.08.22
C014618.00-SSDA 45	STORMWATER DRAINAGE DETAILS – SHEET 1	B	26.08.22
C014618.00-SSDA 46	STORMWATER DRAINAGE DETAILS – SHEET 2	B	26.08.22
C014618.00-SSDA 50	FINISHED LEVELS PLAN – GROUND	D	16.09.22
C014618.00-SSDA 51	FINISHED LEVELS PLAN – LEVEL 1	B	26.08.22
Tree works & landscaping drawings			
TPMP.01	TREE RETENTION & REMOVAL PLAN	B	26.08.22
TPMP.02	TREE PROTECTION MANAGEMENT PLAN	B	26.08.22
TPMP.03	TREE PROTECTION MANAGEMENT PLAN	B	26.08.22
TPMP.04	TREE PROTECTION MANAGEMENT PLAN	B	26.08.22
L-01	COVERSHEET	D	06.09.22
L-02	LANDSCAPE MASTERPLAN	D	06.09.22
L-03	LANDSCAPE CONCEPT PLAN 01	D	06.09.22
L-04	LANDSCAPE CONCEPT PLAN 02	D	06.09.22
L-05	LANDSCAPE CONCEPT PLAN 03	D	06.09.22
L-06	LANDSCAPE CONCEPT PLAN 04	D	06.09.22
L-07	LEVEL 1 LANDSCAPE PLAN	D	06.09.22
L-08	LANDSCAPE PLANTING STRATEGY	D	06.09.22
L-09	DETAIL PLAN: TYPICAL SETBACK PLANTING	D	06.09.22
L-10	LANDSCAPE SECTION A-A	D	06.09.22
L-11	LANDSCAPE SECTION B-B	D	06.09.22
L-12	LANDSCAPE SECTION C-C	D	06.09.22
L-13	LANDSCAPE SECTION D-D	D	06.09.22
L-14	INDICATIVE PLANT LIST	D	06.09.22
L-15	TYPICAL SPECIFICATION & MAINTENANCE NOTES	D	06.09.22
L-16	TYPICAL LANDSCAPE DETAILS	D	06.09.22
Architectural drawings			
DA000	COVER SHEET	5	15.09.22
DA010	3D VIEW PERSPECTIVIES 01	4	05.09.22
DA011	3D VIEW PERSPECTIVIES 02	3	05.09.22
DA015	3D SECTION	4	05.09.22
DA050	SITE ANALYSIS PLAN & SUMMARY	6	05.09.22
DA100	WAREHOUSE GF PLAN	8	15.09.22
DA101	WAREHOUSE GF MEZZ PLAN	4	05.09.22

DA102	WAREHOUSE L1 PLAN	6	05.09.22
DA103	WAREHOUSE L1 MEZZ PLAN	4	05.09.22
DA104	WAREHOUSE ROOF PLAN	4	05.09.22
DA105	SERVICES-CONSTRAINTS PLAN	2	05.09.22
DA200	OFFICE 01 FLOOR PLANS	2	05.09.22
DA201	OFFICE 02 & 03 FLOOR PLANS	2	05.09.22
DA202	OFFICE 04 & 05 FLOOR PLANS	3	05.09.22
DA203	OFFICE 06 FLOOR PLANS	2	05.09.22
DA204	OFFICE 07 & 08 FLOOR PLANS	2	05.09.22
DA205	OFFICE 09 & 10 FLOOR PLANS	2	05.09.22
DA300	ELEVATIONS	4	05.09.22
DA301	BREEZEWAY ELEVATIONS	4	05.09.22
DA310	SECTIONS	4	05.09.22
DA400	SHADOW DIAGRAMS	3	05.09.22
DA500	SIGNAGE DETAILS	2	15.09.22
DA600	GFA CALCULATIONS	3	05.09.22

APPENDIX C
STATUTORY COMPLIANCE TABLE

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	**Section reference**	**Mandatory consideration**	**Relevance**	**Section in the EIS**
Considerations under the EP&A Act and EP&A Regulation				
Environmental Planning and Assessment Act 1979	Section 1.3 – Objects of the Act	*(a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,*	The proposed development is appropriately located in an existing industrial area of strategic importance. The suitability of the subject site and the proposed development would see social and economic benefits for the area, without impacts to the State's natural and other resources.	**N/A**
		(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,	The proposal facilitates ecologically sustainable development.	Refer to **Section 6.1.8** of the EIS.
		(c) to promote the orderly and economic use and development of land,	As well as fulfilling a significant role in satisfying market needs and improving the operational efficiencies of industrial and warehouse land uses within NSW, the proposal also demonstrates a logical redevelopment of a dated industrial site. The site's economic development is both logical and orderly for the following reasons: ▪ It delivers employment-generating opportunities in both the construction and operational phases in an area already earmarked by both State and Regional policies for employment and advancement. ▪ It provides both a new economically and ecologically sustainable	**N/A**

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	**Section reference**	**Mandatory consideration**	**Relevance**	**Section in the EIS**
			development, delivering new industry-best-practice in industrial construction. ▪ It provides a genuine and obvious transition from existing industrial development, further reinforcing the notion of orderly development, within an area already designated for such purposes. ▪ It implements best-practice sustainability measures, to promote ecologically sustainable development. ▪ It includes increased provisions for landscaping, helping to revitalise and naturally landscape a substantial canopy cover across the site, further minimising the potential impacts of the Urban Heat Island Effect, by further reducing the site's microclimate. ▪ It improves water-quality for stormwater in accordance with the requirements of Council's engineering guidelines.	
		(d) to promote the delivery and maintenance of affordable housing,	Not applicable – this objective is not applicable to the proposed development, as the proposal does not seek consent for housing.	**N/A**
		(e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,	The subject site's biodiversity has been suitably assessed, including impacts to threatened and other species of native animals and plants, ecological communities and their habitats.	Refer to **Section 6.1.9** of the EIS.

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	**Section reference**	**Mandatory consideration**	**Relevance**	**Section in the EIS**
		(f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),	Both environmental and Aboriginal cultural heritage has been suitably assessed, finding that: ▪ the proposed development does not impact on any items of historical heritage; and ▪ the entirety of the subject site is considered to be of low archaeological potential to contain Aboriginal cultural heritage and there will be no harm to known heritage values by the proposed works.	Refer to **Section 6.1.18** and **6.1.19** of the EIS.
		(g) to promote good design and amenity of the built environment,	The vision of the proposed development is to create a quality built form with integrated landscaping. The proposed development is considered to promote both good design and improved amenity, through the use of new-age materials and innovative contemporary design. Colours proposed for the facades of the building are typical of this type of development with more muted recessive tones applied, that will transition well from the existing neighbouring developments. The proposed development can be seen to promote both good design and at the same time improving the amenity of the built environment through activation of the site by enhanced landscaping across the site. Through both the use of new-age materials and an innovative contemporary design, the proposed development allows the built form to connect with the natural landscape, to tie the	Refer to **Section 6.1.3** and **6.1.4** of the EIS.

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	**Section reference**	**Mandatory consideration**	**Relevance**	**Section in the EIS**
			built-form elements into a relatable thematic nexus to the natural environment, using industry-best-practice.	
		(h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,	The proposed development would be implemented through best-industry practice standards and measures. The proposal has been designed in accordance with the NCC. This incorporates into the design, all statutory and functional requirements, regarding access, egress and fire, which are deemed necessary to safeguard the safety of building occupants and the longevity of the development.	**N/A**
		(i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,	This proposal is SSD, which devolves the environmental planning and assessment of the application to NSW DPE. Notwithstanding, the proposal has also been informed by engagement with Council.	**N/A**
		(j) to provide increased opportunity for community participation in environmental planning and assessment.	Community and stakeholder engagement has been undertaken for the proposed development. This has included meetings and notification letters to both agencies and all potentially impacted stakeholders.	Refer to **PART 5** and **Section 6.1.25** of the EIS.
	Section 4.15(1)(a) – Matters for consideration—general	*(i) any relevant environmental planning instrument, and*	EPIs relevant to the proposal include: ▪ *State Environmental Planning Policy (Planning Systems) 2021* ▪ *State Environmental Planning Policy (Resilience and Hazards) 2021* ▪ *State Environmental Planning Policy (Industry and Employment) 2021*	Refer below.

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	**Section reference**	**Mandatory consideration**	**Relevance**	**Section in the EIS**
			▪ *State Environmental Planning Policy (Transport and Infrastructure) 2021* ▪ *State Environmental Planning Policy (Biodiversity and Conservation) 2021* ▪ *Bankstown Local Environmental Plan 2015*	
		(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and	Draft EPIs relevant to the proposal include: ▪ *Consolidated Canterbury Bankstown Local Environmental Plan*	Refer below.
		(iii) any development control plan, and	Despite the relevance of Clause 2.2 of the *State Environmental Planning Policy (Planning Systems) 2021*, the *Bankstown Development Control Plan 2015* has been considered and assessed.	Refer to **Appendix 29** of this EIS.
		(iiia) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and	Not applicable – no planning agreements apply to the subject site or proposed development.	**N/A**
		(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph),	-	Refer below.
	Section 4.15(1)(b) – Matters for consideration—general	*the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,*	**-**	Refer to **PART 6** of this EIS.

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	**Section reference**	**Mandatory consideration**	**Relevance**	**Section in the EIS**
	Section 4.15(1)(c) – Matters for consideration—general	*the suitability of the site for the development,*	-	Refer to **Section 2.4** of this EIS.
	Section 4.15(1)(d) – Matters for consideration—general	*any submissions made in accordance with this Act or the regulations*	Part of the forthcoming exhibition and response to submissions phases.	**N/A**
	Section 4.15(1)(e) – Matters for consideration—general	*the public interest*	-	Refer to **Section 6.1.25** of this EIS.
Environmental Planning and Assessment Regulation 2021	Clause 190 – Form of environmental impact statement	*(1) An environmental impact statement must contain the following information—* *(a) the name, address and professional qualifications of the person who prepared the statement,* *(b) the name and address of the responsible person,* *(c) the address of the land—* *(i) to which the development application relates, or* *(ii) on which the activity or infrastructure to which the statement relates will be carried out,* *(d) a description of the development, activity or infrastructure,* *(e) an assessment by the person who prepared the statement of the environmental impact of the*	-	Refer to **WHOLE EIS**.

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	**Section reference**	**Mandatory consideration**	**Relevance**	**Section in the EIS**
		development, activity or infrastructure, dealing with the matters referred to in this Division.		
		(2) The person preparing the statement must have regard to— *(a) for State significant development—the State Significant Development Guidelines, or* *(b) for State significant infrastructure—the State Significant Infrastructure Guidelines.*	-	Refer to **WHOLE EIS.**
		(3) An environmental impact statement must also contain a declaration by a relevant person that— *(a) the statement has been prepared in accordance with this Regulation, and* *(b) the statement contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure, and* *(c) the information contained in the statement is not false or misleading, and* *(d) for State significant development or State significant infrastructure—the statement contains the information required under the Registered Environmental Assessment Practitioner Guidelines.*	-	Refer to **EIS DECLERATION** on **page ii** of this EIS.

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	**Section reference**	**Mandatory consideration**	**Relevance**	**Section in the EIS**
	Clause 191 – Compliance with environmental assessment requirements	*The environmental impact statement must comply with the environmental assessment requirements notified under section 176 or the Act, section 5.16(4).*	The SEARs (reference: SSD-45998963), issued by the NSW DPE on 12 July 2022, identify the following Key Issues: 1. Statutory Context 2. Capital Investment Value and Employment 3. Design Quality 4. Built Form and Urban Design 5. Visual Impact 6. Traffic, Transport and Accessibility 7. Trees and Landscaping 8. Ecologically Sustainable Development (ESD) 9. Biodiversity 10. Air Quality 11. Noise and Vibration 12. Ground and Water Conditions 13. Stormwater and Wastewater 14. Flooding Risk 15. Hazards and Risks 16. Contamination and Remediation 17. Waste Management 18. Aboriginal Cultural Heritage 19. Environmental Heritage 20. Social Impact 21. Infrastructure Requirements and Utilities 22. Bush Fire Risk	Refer to **PART 6** of this EIS.

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	**Section reference**	**Mandatory consideration**	**Relevance**	**Section in the EIS**
			23. Construction, Operation and Staging 24. Contributions and Public Benefit 25. Engagement	
Considerations under EPIs				
State Environmental Planning Policy (Planning Systems) 2021	Part 2.2 – State significant development	*(1) Development is declared to be State significant development for the purposes of the Act if—* *(a) the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and* *(b) the development is specified in Schedule 1 or 2.*	In accordance with Schedule 1 of the Planning Systems SEPP, development that has a CIV of more than $30 million for the purpose of a warehouse or distribution centre, constitutes SSD. The CIV of the proposed development is more than $30 million.	Refer to **Section 1.5** of this EIS.
State Environmental Planning Policy (Resilience and Hazards) 2021	Clause 4.6 – Contamination and remediation to be considered in determining development application	*(1) A consent authority must not consent to the carrying out of any development on land unless—* *(a) it has considered whether the land is contaminated, and* *(b) if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and* *(c) if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land*	Detailed site investigations of the subject site have identified that remediation is required to make the land suitable for the proposed development.	Refer to **Section 6.1.16** of this EIS.

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	**Section reference**	**Mandatory consideration**	**Relevance**	**Section in the EIS**
		will be remediated before the land is used for that purpose.		
State Environmental Planning Policy (Industry and Employment) 2021	Clause 3.6 – Granting of consent for signage	*A consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied—* *(a) that the signage is consistent with the objectives of this Chapter as set out in section 3.1(1)(a), and* *(b) that the signage the subject of the application satisfies the assessment criteria specified in Schedule 5.*	The proposal seeks consent for signage, which necessitates assessment against Chapter 3 and Schedule 5 of the Industry and Employment SEPP.	Refer below and **Appendix 30** of this EIS.
	Clause 3.11 – Matters for consideration	*(1) A consent authority (other than in a case to which subsection (2) applies) must not grant consent to an application to display an advertisement to which this Chapter applies unless the advertisement or the advertising structure, as the case requires—* *(a) is consistent with the objectives of this Chapter as set out in section 3.1(1)(a), and* *(b) has been assessed by the consent authority in accordance with the assessment criteria in Schedule 5 and the consent authority is satisfied that the proposal is acceptable in terms of its impacts, and* *(c) satisfies any other relevant requirements of this Chapter.*	-	Refer below and **Appendix 30** of this EIS.
	Clause 3.1 – Aims, objectives etc	*(1) (a) to ensure that signage (including advertising)—*	Signage will be considered on an estate-wide basis, such that there will be consistency in materials and finishes of the signs across the	Refer to **Appendix 4**, **Appendix 9** and

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	**Section reference**	**Mandatory consideration**	**Relevance**	**Section in the EIS**
		(i) is compatible with the desired amenity and visual character of an area, and *(ii) provides effective communication in suitable locations, and* *(iii) is of high quality design and finish, and*	estate. Signage will be a combination of building mounted signs, and estate and tenant identification signs in landscape setbacks, at driveway entries and building entrances. The signage design will be considered as part of the landscape and architectural language of the buildings, to provide placemaking and wayfinding principles for safety and user experience throughout the estate.	**Appendix 30** of this EIS.
State Environmental Planning Policy (Transport and Infrastructure) 2021	Division 5, Subdivision 2 – Development likely to affect an electricity transmission or distribution network	*(2) Before determining a development application (or an application for modification of a consent) for development to which this section applies, the consent authority must—* *(a) give written notice to the electricity supply authority for the area in which the development is to be carried out, inviting comments about potential safety risks, and* *(b) take into consideration any response to the notice that is received within 21 days after the notice is given.*	The proposal involves works within 5m of an exposed overhead electricity power line, as such consideration of Subdivision 2 is required.	Refer to **Section 6.1.21** of this EIS.
	Clause 2.122 – Traffic generating development	*(1) This section applies to development specified in Column 1 of the Table to Schedule 3 that involves—* *(a) new premises of the relevant size or capacity, or* *(b) an enlargement or extension of existing premises, being an alteration or addition of the relevant size or capacity.*	The proposal involves a warehouse and distribution centre with a site area greater than 8,000m^2, which constitutes traffic-generating development, as described in Schedule 3 of the Transport and Infrastructure SEPP.	Refer to **Section 6.1.6** of this EIS.

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	**Section reference**	**Mandatory consideration**	**Relevance**	**Section in the EIS**
		[…] *(2) Before determining a development application for development to which this section applies, the consent authority must—* *(a) give written notice of the application to TfNSW within 7 days after the application is made, and* *(b) take into consideration—* *(i) any submission that RMS provides in response to that notice within 21 days after the notice was given (unless, before the 21 days have passed, TfNSW advises that it will not be making a submission), and* *(ii) the accessibility of the site concerned, including—* *(A) the efficiency of movement of people and freight to and from the site and the extent of multi-purpose trips, and* *(B) the potential to minimise the need for travel by car and to maximise movement of freight in containers or bulk freight by rail, and* *(iii) any potential traffic safety, road congestion or parking implications of the development.*		
Bankstown Local Environmental Plan 2015	Clause 4.4 – Floor space ratio	*(2) The maximum floor space ratio for a building on any land is not to exceed the floor space ratio shown for the land on the Floor Space Ratio Map.*	The Floor Space Ratio Map prescribes a Floor Space Ratio (FSR) for the subject site of 1:1. As the two (2) subject lots are to be amalgamated as part of this application, the	Refer to **Appendix 4** of this EIS.

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	**Section reference**	**Mandatory consideration**	**Relevance**	**Section in the EIS**
			resulting FSR of the proposal has been calculated on the total site area and resulting total gross floor area (GFA). The following development parameters are of relevance: ▪ Total site area = 33,772m^2 ▪ Total GFA = 32,799m^2 The FSR for the propose development, as calculated in accordance with Clause 4.5, is 0.97:1.	
	Clause 5.21 – Flood Planning	*(2) Development consent must not be granted to development on land the consent authority considers to be within the flood planning area unless the consent authority is satisfied the development—* *(a) is compatible with the flood function and behaviour on the land, and* *(b) will not adversely affect flood behaviour in a way that results in detrimental increases in the potential flood affectation of other development or properties, and* *(c) will not adversely affect the safe occupation and efficient evacuation of people or exceed the capacity of existing evacuation routes for the surrounding area in the event of a flood, and* *(d) incorporates appropriate measures to manage risk to life in the event of a flood, and*	Review of the Council's Flood Letters and Council's online Stormwater and Flood Maps indicate there is no flooding in the 1% AEP local events, but some flooding in the PMF event. The requirements of Council and NSW Floodplain Development Manual are addressed and met for the proposed development.	Refer to **Section 6.1.14** of this EIS.

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	**Section reference**	**Mandatory consideration**	**Relevance**	**Section in the EIS**
		(e) will not adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses. *(3) In deciding whether to grant development consent on land to which this clause applies, the consent authority must consider the following matters—* *(a) the impact of the development on projected changes to flood behaviour as a result of climate change,* *(b) the intended design and scale of buildings resulting from the development,* *(c) whether the development incorporates measures to minimise the risk to life and ensure the safe evacuation of people in the event of a flood,* *(d) the potential to modify, relocate or remove buildings resulting from development if the surrounding area is impacted by flooding or coastal erosion.*		
	Clause 6.2 – Earthworks	*(2) Development consent is required for earthworks unless—* *(a) the earthworks are exempt development under this Plan or another applicable environmental planning instrument, or* *(b) the earthworks are ancillary to development that is permitted without consent under this Plan or to*	Earthworks are proposed as part of this development application, requiring consideration of Clause 6.2 of the BLEP2015.	Refer to **Section 6.1.12** of this EIS.

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	**Section reference**	**Mandatory consideration**	**Relevance**	**Section in the EIS**
		development for which development consent has been given. *(3) In deciding whether to grant development consent for earthworks (or for development involving ancillary earthworks), the consent authority must consider the following matters—* *(a) the likely disruption of, or any detrimental effect on, drainage patterns and soil stability in the locality of the development,* *(b) the effect of the development on the likely future use or redevelopment of the land,* *(c) the quality of the fill or the soil to be excavated, or both,* *(d) the effect of the development on the existing and likely amenity of adjoining properties,* *(e) the source of any fill material and the destination of any excavated material,* *(f) the likelihood of disturbing relics,* *(g) the proximity to, and potential for adverse impacts on, any waterway, drinking water catchment or environmentally sensitive area,* *(h) any appropriate measures proposed to avoid, minimise or mitigate the impacts of the development.*		
Considerations under draft EPIs				

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	**Section reference**	**Mandatory consideration**	**Relevance**	**Section in the EIS**
Consolidated Canterbury Bankstown Local Environmental Plan	Whole document	-	Following a review of the draft *Consolidated Canterbury Bankstown Local Environmental Plan*, it understood that the same land use zoning and development standards will apply to the subject site.	**N/A**
Considerations under other legislation				
Commonwealth Environment Protection and Biodiversity Conservation Act 1999	Division 1—Requirements relating to matters of national environmental significance	*Division 1—Requirements relating to matters of national environmental significance*	Relevant and potential MNES listed under the EPBC Act include both PCTs 849 and 1800. The Biodiversity Development Assessment Report, prepared by écologique, has determined that the proposed development would not result in potential significant impacts to MNES.	Refer to **Section 6.1.9** and **Appendix 14** of this EIS.
Biodiversity Conservation Act 2016	Section 7.9 – Biodiversity assessment for State significant development or infrastructure	*(1) This section applies to—* *(a) an application for development consent under Part 4 of the Environmental Planning and Assessment Act 1979 for State significant development, and* *(b) an application for approval under Division 5.2 of the Environmental Planning and Assessment Act 1979 to carry out State significant infrastructure.* *(2) Any such application is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.*	écologique have prepared a Biodiversity Development Assessment Report, as required by the SEARs, in accordance with the requirements of (and information provided under) the current BAM.	Refer to **Section 6.1.9** of this EIS.

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory document	**Section reference**	**Mandatory consideration**	**Relevance**	**Section in the EIS**
		(3) The environmental impact statement that accompanies any such application is to include the biodiversity assessment required by the environmental assessment requirements of the Planning Agency Head under the Environmental Planning and Assessment Act 1979.		

APPENDIX D
COMMUNITY ENGAGEMENT TABLE

COMMUNITY ENGAGEMENT TABLE			
Stakeholder Group	**Organisations**	**Matters Raised**	**Satisfied by**
Indigenous community	Aboriginal and/or Torres Strait Islander communities	▪ Engagement with Aboriginal stakeholders was undertaken to inform the ACHAR process and methodology. ▪ On 1 June 2022, Austral Archaeology contacted Heritage NSW, Gadangara Local Aboriginal Land Council (GLALC), NSW Local Land Services, Canterbury-Bankstown Council, and the National Native Title Tribunal, seeking information about potential Aboriginal stakeholders. Heritage NSW responded with a list of potentially interested stakeholders, and GLALC responded signalling their interest in participating. ▪ Austral Archaeology placed an advertisement in the Canterbury Bankstown Torch (a local newspaper) requesting that parties with cultural knowledge register their interest in the project. ▪ A total of 13 parties were confirmed as registered Aboriginal stakeholders for the project, and on 15 July 2022, information about the proposal and Austral Archaeology's proposed project methodology was provided to those parties for comment (within a 28 day window). ▪ Four registered Aboriginal stakeholders provided comment on the proposed methodology, with three in support. The other stakeholder did not provide a comment, but noted they held local cultural knowledge and expressed their interest in providing fieldwork services at the site (if such work was required). ▪ One registered Aboriginal stakeholder provided additional comment, noting the cultural importance of waterways in the Milperra area (due to their provision of flora and fauna resources) and expressed their desire for the care and rejuvenation of these resources. Additionally, one registered Aboriginal stakeholder noted the importance of considering natural heritage during site surveys. ▪ On 15 September 2022, Austral Archaeology distributed the draft ACHAR to registered Aboriginal stakeholders for review. Registered Aboriginal stakeholders had a 28 day period to provide comment, and this process was finalised on 13 October 2022.	▪ The proposal would retain mature eucalypt trees on the site. ▪ The recommended mitigations of the ACHAR will be adhered to in the result of any construction works at the site. ▪ Additional engagement with registered Aboriginal stakeholders would be undertaken as required by any unexpected findings during construction works at the site.

		▪ Four registered Aboriginal stakeholders provided a response to the draft ACHAR. Three of the four noted their support for the report, whilst a fourth noted only that any artefacts found on site during construction should be buried in a safe place on site. ▪ A copy of the final ACHAR was lodged with all registered Aboriginal stakeholders on 13 October 2022. ▪ Additional details about engagement with Aboriginal stakeholders and a list of registered Aboriginal stakeholders are detailed in **Section 6.1.18** of this EIS.	
NSW Government agencies	NSW DPE	The proponent attended a scoping meeting with NSW DPE on 20 June 2022. Key matters raised included assessment of contamination at the site, noise modelling and truck movements, traffic impacts, and potential impacts to Bankstown Airport.	Discussions informed project design, request for SEARS, and the EIS.
	NSW EPA	▪ Letter was emailed to EPA on 21 July 2022. ▪ Response received 16 August 2022 ▪ The NSW EPA advised that they had no comment on the proposed development.	No action required.
	Heritage NSW	Refer to Indigenous community consultation notes above.	Refer to Indigenous community consultation notes above.
	NSW Fire & Rescue	▪ Letter was emailed to NSW Fire and Rescue on 14 September 2022. ▪ Response received 15 September 2022. ▪ NSW Fire and Rescue advised HillPDA that they do not respond to consultation undertaken outside of NSW DPE's Planning Portal.	No action required.
	TfNSW	▪ On 22 June 2022, the proponent's traffic consultants Colston Budd Rogers & Kafes contacted TfNSW requesting their input into the proposal. ▪ Response was received on 11 July 2022, which suggested that TfNSW would be happy to have a meeting following the preparation of the TAIA. ▪ Following receipt of the above, Colston Budd Rogers & Kafes contacted TfNSW's Land Use Planner to advise the following: o that industry specific SEARs were being used for this project, and DPIE may not contact TfNSW regarding the	No action required.

		development prior to lodgement. I provided TfNSW a copy of the SEARs; ○ that the proposed development is in a large existing industrial area, is permissible and would have only a modest traffic generation; and ○ that the development does not front any classified roads which would require TfNSW concurrence for access. ▪ Colston Budd Rogers & Kafes questioned if TfNSW thought it was necessary to have a meeting and indicated they would be happy to meet if required. TfNSW indicated they would revert back to confirm. ▪ Colston Budd Rogers & Kafes have followed up with a number of phone calls, but have not heard back from TfNSW.	
Infrastructure providers	Ausgrid	▪ Email letter sent to Ausgrid on 21 July 2022. ▪ Response received 16 August 2022 ▪ Ausgrid informed HillPDA that they had no comment to make on the proposal at this stage other than noting that the EIS package would need to address SEARs item 21 (Infrastructure Requirements and Utilities).	▪ As per the Service Infrastructure Assessment prepared to accompany the proposal by LandPartners the proponent's electrical design consultant has lodged an application with Ausgrid to determine the required level of supply for the development. ▪ The proponent would undertake any works required to adequately supply the site with electricity.
	Sydney Water	▪ Email letter sent to Sydney Water on 21 July 2022. ▪ Response received 4 August 2022 ▪ Sydney Water advised that a range of water provision considerations be addressed at the exhibition stage, including projected service demands and relevant approvals. ▪ Additionally, LandPartners undertook a Service Infrastructure Assessment for the site. This included a request for a Statement of Available Pressure and Flow, sent to Sydney Water on 24 June 2022.	No action required. The Service Infrastructure Assessment confirms reasonable water flow is available from a nearby water main pipe. That assessment also confirmed that the site has access to adequate wastewater servicing.

		▪ A response was received on 4 July 2022, detailing the level of water service available to the site.	
	Telstra	▪ Email letter sent 21 July 2022. ▪ Response received 21 July 2022 ▪ Telstra advised HillPDA that NBNCo were responsible for telecommunications service to the proposed development and therefore provided no comment.	No action required. The Service Infrastructure Assessment confirms that the site has access to adequate existing service from NBNco.
	NBNCo	▪ Email letter sent 21 July 2022. ▪ Response received 2 August 2022 ▪ NBNCo informed HillPDA that NBNCo had available infrastructure to service the proposed development, and that any infrastructure within the development would be the developer's responsibility.	No action required. The Service Infrastructure Assessment confirms that the site has access to adequate existing service from NBNco.
Local government	Canterbury Bankstown City Council	▪ On 20 June 2022, the proponent emailed a Canterbury-Bankstown Council representative providing details of the proposed development and requesting Council's input into the development process including a pre-DA meeting. ▪ The proponent attended a Pre-DA meeting with Canterbury-Bankstown Council on 8 July 2022. ▪ A number of matters were discussed at the Pre-DA meeting. The proponent is awaiting feedback from Council in relation to this meeting. ▪ The proponent provided elevations and sections of the proposed development to Council for comment on 9 August 2022. ▪ Willowtree Planning followed up with Council representatives on 22 August, 29 August, and 5 September 2022 to confirm meeting minutes and receive any comments on the documents provided. ▪ On 13 October 2022, Willowtree Planning received meeting notes from Council via email. ▪ The notes confirmed that the proponent and Council discussed a wide range of matters in relation to the proposal. Key matters included: o Concerns relating to the bulk, scale, and height of the proposal in relation to existing development in the area	▪ Matters raised in the Pre-DA meeting have been considered and changes to the project design or scope of works are reflected in this proposal. ▪ Reporting requirements and considerations raised in the Pre-DA meeting have been incorporated into the EIS, including: o The Landscape and Visual Impact Assessment Report has concluded that the significance of the impact upon the landscape at this project development on average will be minor, and demonstrates that the proposed bulk, scale and

		○ The importance of façade articulation and the 10 metre landscape setback to improve the proposal's relationship with the street ○ Traffic impacts and modelling ○ The anticipated extent of cut and fill requirements and the consideration of any changes to flooding impacts ○ Waste management and servicing ▪ In addition to the above, Council raised various compliance matters such as parking, development near the Bankstown Aerodrome, and driveway and pedestrian access to the site. Council also noted a range reporting and considerations that should be undertaken. Full meeting notes are included **Appendix 28** of this EIS.	height is commensurate to the surrounding area. ○ The frontage façade has been suitably articulated and setback from the Horsley Road frontage. ○ Traffic impacts and modelling have been assessed and determined that the road network will be able to cater for the anticipated traffic generation from the proposed development. ○ The subject site has been assessed and considered to be clear of 1% AEP flooding and clear of overland flow paths, and that any additional modelling to confirm flooding or flood impact are not required for this proposed development. ○ Strategies that will be implemented to minimise waste generation and maximise reuse and recycling. ○ No concerns regarding height of proposed buildings were raised by Sydney Metro Airports,

			noting that the RL51 metre height limit should be considered for any crane operations required to support the construction of the proposal. ▪ The proponent has considered and addressed the matters raised by Council and the will continue discussions with Council as required through the assessment process.
Other	Bankstown Aerodrome (Sydney Metro Airports)	▪ The proponent notified Sydney Metro Airport Bankstown regarding the proposed development. ▪ Response received 11 July 2022. ▪ The response indicated no concerns regarding height of proposed buildings, and referred the proponent to the RL51 metre height limit for any crane operations required to support the construction of the proposal.	The proponent will ensure that any works at the site comply with relevant height limits for crane operations during construction.
Community	Neighbouring businesses	▪ HILLPDA distributed letters to neighbouring properties on 22 July 2022 to notify them of the proposed development and allow for comment via direct contact with HillPDA or online survey. ▪ The survey period remained open from 22 July 2022 to 18 August 2022. ▪ No responses were received.	No action required.
	Western Sydney University	▪ HillPDA contacted Western Sydney University on 21 July 2022 and 29 July 2022 to notify of the proposed development and allow for comment. ▪ No response was received.	No action required.

APPENDIX E
MITIGATION MEASURES TABLE

By:	Hale Capital Development Management Pty Ltd
In relation to:	State Significant Development Application (SSD-45998963) For Horsley Road Multi-level Warehouse, Milperra
Site:	339 and 349 Horsley Road, Milperra Lot 140 and 141 DP 550194

Hale Capital Development Management Pty Ltd (HC), plan to undertake the construction and operation of the proposed warehouse and distribution centre, in accordance with the following planned management and mitigation measures.

PLANNED MANAGEMENT AND MITIGATION MEASURES FOR SSD-45998963		
ID	**Management / Mitigation Measure**	**Timing**
Administrative Commitments		
A1	**Commitment to Minimise Harm to the Environment** HC will commit to implement all reasonable and feasible measures, to prevent and/or minimise any harm to the environment, that may result from the construction or operation of the proposed development	Prior to construction, during construction, and during operation.
A2	**Terms of Approval** HC will carry out the project generally in accordance with the: (a) Environmental Impact Statement; (b) Drawings and Plans; (c) Management and Mitigation Measures; (d) Any Conditions of Approval. If there is any inconsistency between the above, the Conditions of Approval shall prevail to the extent of the inconsistency.	Prior to construction, during construction, and during operation.
A3	**Occupation Certificate** HC will ensure that Occupation Certificates are obtained prior to the occupation of the facilities.	Prior to operation.
A4	**Compliance** HC will ensure compliance with any reasonable requirement(s) of the Secretary of the NSW DPE arising from the assessment of: (a) Any reports, plans, programs, strategies or correspondence that are submitted in relation to this Approval; and (b) The implementation of any recommended actions or measures contained in reports, plans, programs, strategies or correspondence submitted by the Project Team as part of the application for Approval.	Prior to construction, during construction, and during operation.
A5	**Structural Adequacy** HC will ensure that all new buildings and structures on the site are constructed in accordance with the relevant requirements of the National Construction Code.	During construction.
A6	**Construction Environmental Management Plan**	Prior to construction.

	Prior to the commencement of construction, HC would prepare a Construction Environmental Management Plan (CEMP) that addresses the following: (a) Air Quality; (b) Noise and Vibration; (c) Waste Classification; (d) Soil Management; (e) Asbestos Removal Control; (f) Traffic Mangement; and (g) Community Consultation and Complaints Handling.	
A7	**Site Induction** All staff employed on the site by the construction contractor will be required to undergo a site induction.	Prior to construction.
A8	**Operation of Plant and Equipment** HC will ensure that all plant and equipment used on-site, is maintained and operated in proper and efficient manner, and in accordance with relevant Australian Standards.	During construction and operation.
A9	**Monitoring the State of Roadways** HC will monitor the state of roadways leading to and from the subject site, during construction, and will take all necessary steps to clean up any adversely impacted road pavements, as a result of the their construction works, as directed by the Canterbury Bankstown City Council.	During construction.
A10	**Waste Receipts** HC will ensure that a permanent record of receipts, for the removal of both liquid and solid waste from the subject site, be kept and maintained up to date at all times. Such records will be made available to authorised person upon request.	During construction and operation.
A11	**Complaints Handling** HC will prepare an Operational Complaints Handling Protocol for the development, prior to the commencement of operations.	Prior to operation.
Specific Environmental Commitments		
Air Quality		
AQ1	Air quality mitigation and monitoring will form part of the CEMP, to be prepared for the project, as outlined in **A6**.	Prior to construction.
Traffic and Transport		
TT1	HC will finalise and implement the Construction Traffic Management Plan (CTMP).	Prior to and during construction.
Remediation		
R1	A Work Health and Safety Management Plan shall be prepared by the remedial contractor, containing procedures and requirements that are to be implemented as a minimum during the works, in addition to the Contingency Plan.	Prior to remediation works.
R2	Site remediation shall be carried out in accordance with the approved Remedial Action Plan.	Prior to operation.

R3	Upon completion of the remediation works, a Validation Report is required to be prepared to verify remedial works were completed in accordance with the Remedial Action Plan.	Prior to operation.
Cultural Heritage		
H1	An Unexpected Finds Policy will be developed, in the unlikely event that relics are identified during ground disturbing works.	Prior to construction.
H2	Unexpected Aboriginal objects remain protected by the *National Parks and Wildlife Act 1974*. If any such objects, or potential objects, are uncovered in the course of the activity, all work in the vicinity will cease immediately. A qualified archaeologist would be contacted to assess the find and Heritage NSW and Metropolitan Local Aboriginal Land Council would be notified.	During construction.
H3	If human remains, or suspected human remains, are found in the course of the activity, all work in the vicinity will cease, the site would be secured, and the NSW Police and Heritage NSW would be notified	During construction.
H4	All relevant staff, contractors and subcontractors will be made aware of their statutory obligations for heritage under the NSW *Heritage Act 1977* and best practice as outlined in *The Burra Charter 2013*, during site inductions.	Prior to construction.
Socio-Economic		
SE1	HC will notify surrounding businesses and residents one (1) week before commencement of construction activities. Notices should include: ▪ Details of the proposal, including contact details of management team ▪ Hours and expected period of construction ▪ Details regarding process should businesses or residents have concerns, questions or complaints	Prior to construction.
SE2	HC will set up a feedback process to manage and respond to stakeholder concerns, questions, or complaints. HC will ensure that this process is clear and accessible to stakeholders such as surrounding businesses and residents.	Prior to and during construction.
SE3	HC will prioritise engaging with local businesses, where practicable, e.g. site induction for visiting workers to include profile of surrounding food and beverage retailer.	During construction.
Waste Management		
WM1	Effective management of construction materials and construction and demolition waste, including options for reuse and recycling where applicable and practicable, would be conducted. Only wastes that cannot be cost effectively reused or recycled will be sent to landfill or appropriate disposal facilities.	During construction.
WM2	Waste materials produced from site preparation and construction activities will be separated at the source and stored separately on-site.	During construction.
WM3	The Site Manager or equivalent role will:	During construction.

	▪ Arrange for suitable waste collection contractors to remove any construction waste from site ▪ Ensure waste bins are not filled beyond recommended filling levels ▪ Ensure that all bins and loads of waste materials leaving site are covered ▪ Maintain waste disposal documentation detailing, at a minimum: o Descriptions and estimated amounts of all waste materials removed from site o Details of the waste and recycling collection contractors and facilities receiving the waste and recyclables o Records of waste and recycling collection vehicle movements, for example, date and time of loads o removed, licence plate of collection vehicles, tip dockets from receiving facility o Waste classification documentation for materials disposed to off-site recycling or landfill facilities ▪ Ensure lawful waste disposal records are readily accessible for inspection by regulatory authorities	
WM4	Site inductions, as required under **A7** will ensure the following training is covered: ▪ Legal obligations and targets ▪ Emergency response procedures on-site ▪ Waste priorities and opportunities for reduction, reuse, and recycling ▪ Waste storage locations and separation of waste ▪ Procedures for suspected contaminated and hazardous wastes ▪ Waste related signage ▪ The implications of poor waste management practices ▪ Responsibilities and reporting, including identification of personnel responsible for waste management and individual responsibilities.	Prior to construction.
Vegetation Management		
VM1	The approved Tree Protection Management Plan shall be implemented, and tree protection measures must be installed and maintained, as required and to the satisfaction of the project arborist.	Prior to and during construction.
VM2	Site inductions, as required under **A7** will ensure the following training is covered: ▪ Understanding of the Tree Protection Management Plan	Prior to construction.
VM3	Inspections shall be conducted by the project arborist at several key points during the construction in order to ensure that protection measures are being adhered to during construction stages and decline in tree health or additional remediation measures can be identified.	During construction.

VM4	All earthworks within the identified tree protection zones of the trees to be retained, shall be supervised by the project arborist.	Prior to and during construction.