URBIS

ESR Horsley Logistics Park Stage 2 3 Johnston Crescent Horsley Park

Environmental Impact Statement

Prepared for

ESR Developments (Australia) Pty Ltd

October 2024

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

Director	Jacqueline Parker
Associate Director	Anna Wang
Consultant	Taylah Brito
Project Code	P0052050
Report Number	Final

Urbis acknowledges the important contribution that Aboriginal and Torres Strait Islander people make in creating a strong and vibrant Australian society.

We acknowledge, in each of our offices, the Traditional Owners on whose land we stand.

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Project details		
Project name	Horsley Logistics Park Stage 2	
Application number	SSD-71144719	
Address of the land in respect of which the development application is made	3 Johnston Crescent, Horsley Park	
Applicant details		
Applicant name	ESR Developments (Australia) Pty Ltd	
Applicant address	Level 12, 135 King Street, Sydney 2000	
Details of people by whom this EIS was prepared		
Names and professional qualifications	Jacqueline Parker Bachelor of Planning (UNSW) Master of Urban Development and Design (UNSW)	Anna Wang Bachelor of Planning (UNSW)
Address	Level 8, Angel Place, 123 Pitt Street, Sydney NSW 2000	
Declaration		

The undersigned declares that this EIS:

- has been prepared in accordance with Schedule 2 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;
- contains the information required under the *Registered Environmental Assessment Practitioner Guidelines*;
- 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.

Signatures	
 Jacqueline Parker, Director (RPIA no. 68278)	 Anna Wang, Associate Director
25/10/2025	25/10/2025

Glossary and Abbreviations

REFERENCE	DESCRIPTION
ACHAR	Aboriginal Cultural Heritage Assessment Report
ACM	Asbestos Containing Material
AEP	Annual Exceedance Probability
AHD	Australia Height Datum
AHIMS	Aboriginal Heritage Information Management System
AIA	Arboricultural Impact Assessment
ANEF	Australian Noise Exposure Forecast
AQIA	Air Quality Impact Assessment
ASS	Acid Sulphate Soils
BC Act	*Biodiversity Conservation Act 2016*
BC Reg	*Biodiversity Conservation Regulation 2017*
BDAR	Biodiversity Development Assessment Report
CBD	Central Business District
CEEC	Critically Endangered Ecological Community
CDA	Concept Development Application
CEMP	Construction Environmental Management Plan
CIV	Capital Investment Value
CMP	Construction Management Plan
CTMP	Construction Traffic Environmental Plan
DCP	Development Control Plan
DP	Deposited Plan
DPHI	New South Wales Department of Planning, Housing and Infrastructure
DSI	Detailed Site Investigation
EIS	Environmental Impact Statement
EP&A Act	*Environmental Planning and Assessment Act 1979*
EPA Regulation	*Environmental Planning and Assessment Regulation 2021*
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999*
EIS	Environmental Impact Statement
EPA	New South Wales Environment Protection Authority

EPI	Environmental Planning Instrument
ESD	Ecologically Sustainable Development
GANSW	Government Architect New South Wales
GFA	Gross Floor Area
GTP	Green Travel Plan
HIPAP	Hazardous Industry Planning Advisory Paper
HIS	Heritage Impact Statement
LAeq	A frequency-weighted Equivalent Continuous Sound Level
LEC	Land Environment Court New South Wales
LEP	Local Environmental Plan
LGA	Local Government Area
LSPS	Local Strategic Planning Statement
MNES	Matters of National Environmental Significance
MUSIC	Model for Urban Stormwater Improvement Conceptualisation
NML	Noise Management Level
NSW	New South Wales
NVIA	Noise and Vibration Impact Assessment
OEMP	Operational Environmental Management Plan
R&H SEPP	*State Environmental Planning Policy (Resilience and Hazards) 2021*
PAD	Potential Archaeological Deposit
PBP	Planning for Bushfire Protection
PCT	Plant Community Type
PMF	Probable Maximum Flood
POM	Plan of Management
PSI	Preliminary Site Investigation
Planning Systems SEPP	*State Environmental Planning Policy (Planning Systems) 2021*
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SIA	Social Impact Assessment
SIDRA	Signalised & Unsignalised Intersection Design and Research Aid
Site	Lot 301 in Deposited Plan 1244594

SSD	State Significant Development
SSDA	State Significant Development Application
T&I SEPP	*State Environmental Planning Policy (Transport and Infrastructure) 2021*
TfNSW	Transport for New South Wales
TIA	Traffic Impact Assessment
VIA	Visual Impact Assessment
WCM	Water Cycle Management
WMP	Waste Management Plan
WSUD	Water Sensitive Urban Design
WWTP	Wastewater Treatment Plant

Summary

This Environmental Impact Statement (**EIS**) has been prepared on behalf of ESR Developments (Australia) Pty Ltd (ESR) (**the applicant**) in support of a State Significant Development Application (**SSDA**) for the site at 3 Johnston Crescent, Horsley Park, legally described as Lot 301 in Deposited Plan 1244594.

The subject site is located within the former CSR Estate, which was previously used for brickmaking and quarrying. As the land was no longer being utilised for quarrying, CSR has proceeded to subdivide and stage out the future development of its land. Following the undertaking of remediation, fill and benching, various parcels have been sold to developers including ESR.

The subject site is located to the north of the recently completed ESR Horsley Logistics Park Stage 1 development. ESR seeks to develop a high-quality warehouse and distribution facility that will complement the industrial operations of the broader Horsley Logistics Park. The proposal will deliver industrial land uses in an existing industrial area with key connections to infrastructure corridors and the Western Sydney Aerotropolis. The warehouse buildings will generate employment for the locality and maximise an underutilised site to strengthen the industrial operations of the Western Sydney Employment Area (**WSEA**).

The project comprises the construction of two warehouse buildings with ancillary offices. The two buildings occupy a single lot owned by ESR, comprising of a continuous pad level with split hardstand areas. Both buildings will support warehouse and distribution use.

The proposal includes a total GFA of 55,900m2, split across two buildings, comprising of 52,794sqm of warehouse GFA and 3,106sqm of office GFA. The development will be supported by the construction of an internal hardstand access, with separate truck and car entry via Johnston Crescent along the eastern boundary, 254 onsite car parking spaces, and landscape setbacks. In addition, the proposal will involve minor earthworks from the established pad levels.

The proposed Warehouse B has an estimated development cost of $61,589,268. The combined estimated development cost for the overall development is $96,686,000. Both warehouse buildings will be located on the same lot owned by ESR and will have the same use. Both warehouse buildings will utilise the same singular vehicle access off Johnston Crescent and the central hardstand area, preventing the subdivision of the land to split the two buildings into separate ownership in the future. Both buildings are proposed with 24/7 operations. It is considered that Warehouse A is sufficiently related to Warehouse B so as to enable it to also be declared SSD as part of the same application.

Warehouse A is therefore sufficiently related to Warehouse B to enable both buildings to comprise the same SSDA under Schedule 1 of the *State Environmental Planning Policy (Planning System) 2021* (**Planning Systems SEPP**), as a development that has an estimated development cost of more than $50 million for the purpose of a Warehouse or Distribution Centre, which is classified as SSD.

The Minister is the consent authority for the proposal in accordance with section 4.5 of the *Environmental Planning and Assessment Act 1979* (**EP&A Act**). Accordingly, this SSDA is being lodged with the NSW Department of Planning, Housing and Industry (**DPHI**) as an SSDA seeking development consent for the proposed construction of two warehouse buildings with ancillary offices on a single lot.

The EIS has been prepared in consideration of the Secretary Environmental Assessment Requirements (**SEARs**) issued for the Proposal on 29 May 2024.

An aerial photograph of the site detailing the development footprints is provided at Figure 1**.**

Figure 1 Aerial Photograph.

Source: Urbis

Feasible Alternatives

ESR identified three project alternatives which were considered in respect to the identified need for the proposed warehouse development.

A ‘do nothing’ approach would overlook the site's inherent opportunities, such as its proximity to the Northern Gateway of the Aerotropolis and employment lands as identified in the Fairfield Local Strategic Planning Statement (**LSPS**). Do nothing would be inconsistent with the site's key features and strategic significance but would also result in its underutilisation, negating its potential to contribute meaningfully to the industrial lands supply and employment opportunities in Western Sydney.

Consideration was given to carrying out development on alternative locations, however, these were dismissed as follows:

- The sites were close to sensitive land activities, including residential development, and potential impacts could not be mitigated.
- The sites were not in proximity to adequate transport infrastructure and would not form part of the broader business park.
- Sites were physically constrained and could not accommodate the required scale of development.
- Sites were constrained by environmental sensitive areas, including vegetation, heritage or bushfire.

Alternative layouts were considered as part of the design and development process. The schemes were ultimately ruled out as:

- Space and hardstand configuration did not meet the needs of tenants
- Significant changes to RLs, which would require amendments to retaining walls
- Increase ramping requirements, which would make truck access difficult to enter and leave the site

Lastly, the siting and design of the proposed warehouses were resolved through a comprehensive analysis of the site opportunities and constraints. This chosen approach represents the most suitable pathway forward. It ensures an efficient and organised development outcome that contributes to the efficient development of the broader ESR estate, whilst also minimising impacts.

The Proposal

The site was identified as being the most suitable location to deliver the project objectives.

The project comprises the construction of two warehouse buildings with ancillary offices. The two buildings occupy a single lot comprising of a continuous pad level, with hardstand areas. Both buildings will support warehouse and distribution use and have the same owner.

The proposed works are summarised in the following key components:

- Minor site grading works from the current pad levels (ranging from RL80 to RL83) to provide a singular pad level at RL78.9 and filling of the sediment basin.
- Total GFA of 55,900sqm, split across two buildings:
  - Warehouse A (two tenants): 20,250sqm
    - Warehouse A1 GFA: 10,825sqm
    - Office A1 GFA: 520sqm
    - Warehouse A2 GFA: 8,388sqm
    - Office A2 GFA: 517sqm
  - Warehouse B (single tenant): 35,650sqm
    - Warehouse GFA: 33,581sqm
    - Office GFA: 2,069sqm
- An internal access road, with separate truck and car entry via Johnston Crescent along the eastern boundary.
- 254 onsite car parking spaces, located on grade and under-croft area.
- Landscape setbacks along all three street frontages.
- Outdoor areas for staff.

The warehouse and distribution use will have 24/7 operation. The project will be constructed in a single stage.

The proposal will be undertaken in accordance with the Architectural Plans prepared by Nettletontribe at **Appendix B**. The proposed photomontage is provided at Figure 2:

Figure 2 Proposed Photomontage

Source: Nettletontribe

Consultation

Community and stakeholder engagement has been undertaken by Urbis and the Project Team in the preparation of the SSDA. This includes direct engagement and consultation with:

- Adjoining landowners and occupants;
- Government, agency and utility stakeholders

No community feedback were received. The outcomes of the stakeholder engagement have been incorporated into the proposed development and are discussed in detail at **Section 5** of this EIS.

Justification of the Project

This EIS assesses the development as proposed with regard to relevant planning instruments and policies, and outlines the mitigation measures to ensure the project does not result in unreasonable or adverse environmental effects. Additionally, the proposed development satisfies the Secretary's Environmental Assessment Requirements (SEARs) issued for the project.

The key issues for all components of the project identified in the SEARs have been assessed in detail, with specialist reports underpinning the key findings and recommendations identified in the Assessment of Impacts in **Section 6**. It has been demonstrated that for each of the likely impacts identified in the assessment of the key issues, the impact will either be positive or can be appropriately mitigated.

The proposal represents a positive development outcome for the site and surrounding area for the following reasons:

- **The proposal is consistent with state and local strategic planning policies:**

  The proposal is consistent with the relevant goals and strategies contained in:

  – Greater Sydney Region Plan: A Metropolis of Three Cities

  – Our Greater Sydney 2056: Western City District Plan

  – Fairfield Local Strategic Planning Statement

- **The proposal satisfies the applicable local and state development controls:**

  The proposal is permissible with consent and meets the relevant statutory requirements of the relevant environmental planning instruments, including

  – *State Environmental Planning Policy (**Planning System**) 2021*

  – *State Environmental Planning Policy (**Transport and Infrastructure**) 2021*

  – *State Environmental Planning Policy (**Resilience and Hazards**) 2021*

  – *State Environmental Planning Policy (**Industry and Employment**) 2021*

  – *State Environmental Planning Policy (**Sustainable Buildings**) 2022*

  – *Western Sydney Employment Area – Fairfield Development Control Plan 2016*

- The proposed development will deliver a total of 55,900sqm of gross floor area, critical warehouse and distribution facilities and is the expansion of the ESR Horsley Park Stage 1 development. The development would attract industries and greater job opportunities.
- The proposed development will contribute to realising the vision for the Western Sydney Employment Area and support the logistics operation of the key industries and the growth of the Precinct.
- The proposed development will supply industrial lands within an employment land release area in response to long term projected population and development growth.
- The construction phase of the proposed development will generate 306 construction jobs and the operational phase of the development will generate 508 employment opportunities.

In view of the above, it is considered that this SSD Application has significant merit and should be approved subject to the implementation of the mitigation measures described in this report and supporting documents.

1. Introduction

This section of the report identifies the applicant for the project and describes the site and proposed development. It outlines the site history and feasible alternatives explored in the development of the proposed concept, including key strategies to avoid or minimise potential impacts.

1.1. Applicant Details

The applicant details for the proposed development are listed in the following table.

Table 1 Applicant Details

DESCRIPTOR	PROPONENT DETAILS
Full Name(s)	ESR Developments (Australia) Pty Ltd
Postal Address	Level 12, 135 King Street, Sydney 2000
ABN	87 159 221 851
Nominated Contact	Grace Macdonald NSW Planning Manager
Contact Details	M +61 411 599 155 D +61 2 9186 4759 E Grace.Macdonald@esr.com

1.2. Project Description

This EIS is submitted to the Department of Planning, Housing and Infrastructure (**DPHI**) on behalf of ESR and in support of an application for SSD-71144719 at 3 Johnston Crescent, Horsley Park, legally described as Lot 301 in Deposited Plan 1244594.

The proposal is stage 2 of the wider ESR Horsley Logistics Park (**HLP**) development and is located within the former CSR Estate.

The SSDA seeks consent for:

- Construction, fit-out, and use of two warehouse and distribution buildings within a single lot. The development has a total GFA of 55,900sqm comprising:
  - 52,794sqm of warehouse space
  - 3,106sqm of office space
  - 254 car parking spaces.
- On-lot landscaping works;
- On-lot civil and infrastructure works;
- Site preparation including minor earthworks from the established pad levels and filling of the sediment basin.
- Construction of internal hardstand access, with separate truck and car entry via Johnston Crescent along the eastern boundary.
- Ancillary infrastructure for each lot including sprinkler tank, pump room;
- Warehouse and way finding signage;

- Use of the proposed buildings for generic ‘warehousing and distribution’ purposes with 24 hour/day, seven day/week operation.

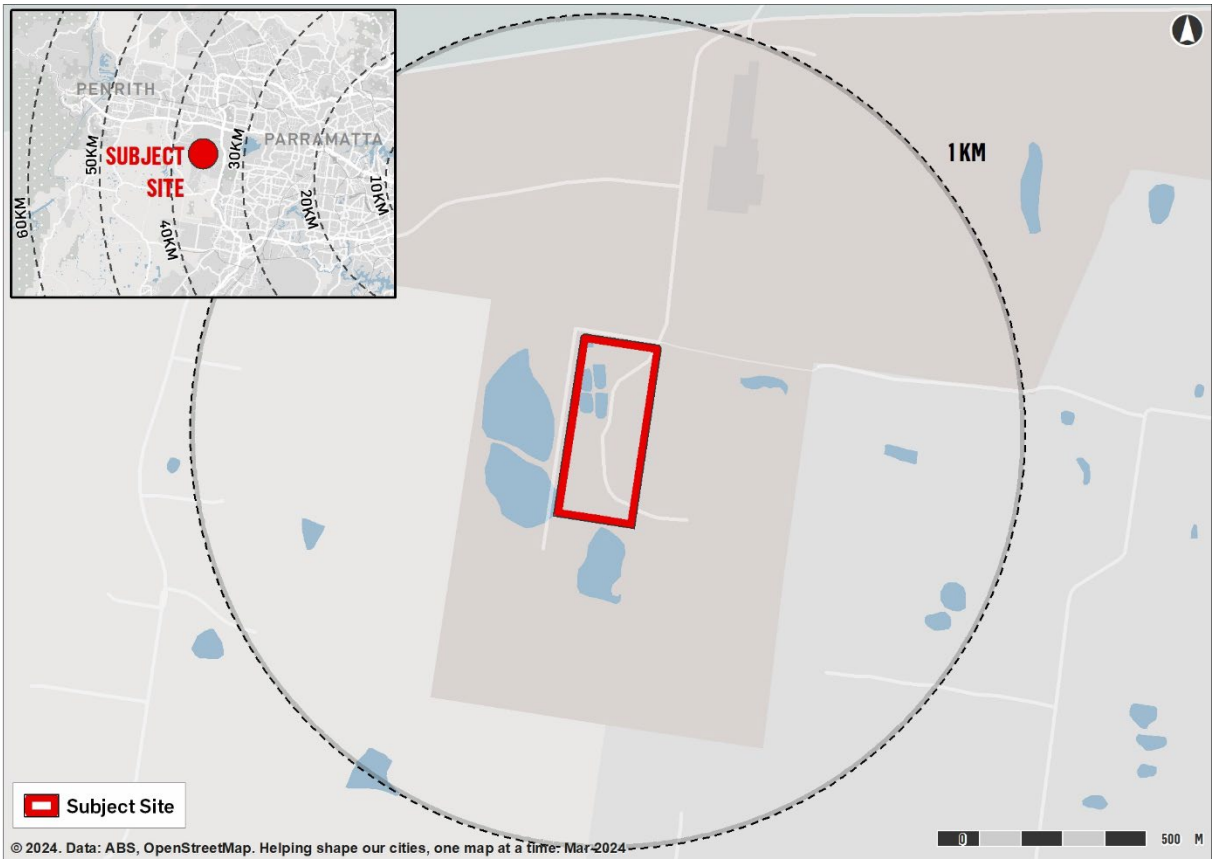
The Proposal aims to integrate with the broader ongoing industrial warehousing precincts surrounding the site including the neighbouring Oakdale Industrial Estate and Frasers Horsley Park development. The Proposal will contribute to the objectives of the WSEA by creating a high-quality warehouse and logistics estate which maximises the employment generating potential of the land to create an efficient, attractive and high-quality employment zone for Western Sydney.

The objectives of the Proposal are to:

- Construct a high-quality warehouse and logistics estate within an emerging warehousing and industrial precinct in Horsley Park;
- Expand and support the operation of the recently completely ESR Horsley Logistics Park Stage 1 development south of the site;
- Better utilise land which has previously been used for quarrying;
- Create both temporary and permanent job opportunities through the construction and operational phase of the Proposal;
- Minimise visual, obstruction of light or glare, noise or any other such impacts on nearby properties;
- Incorporate specialist technical recommendations to provide a holistic response to the careful siting and design of the Proposal; and
- Avoid unacceptable environmental impacts associated with the Proposal through adopting recommended measures to avoid, minimise or manage potential impacts.

A map of the site in its regional setting is provided at Figure 3.

Figure 3 Local Context



Source: Urbis

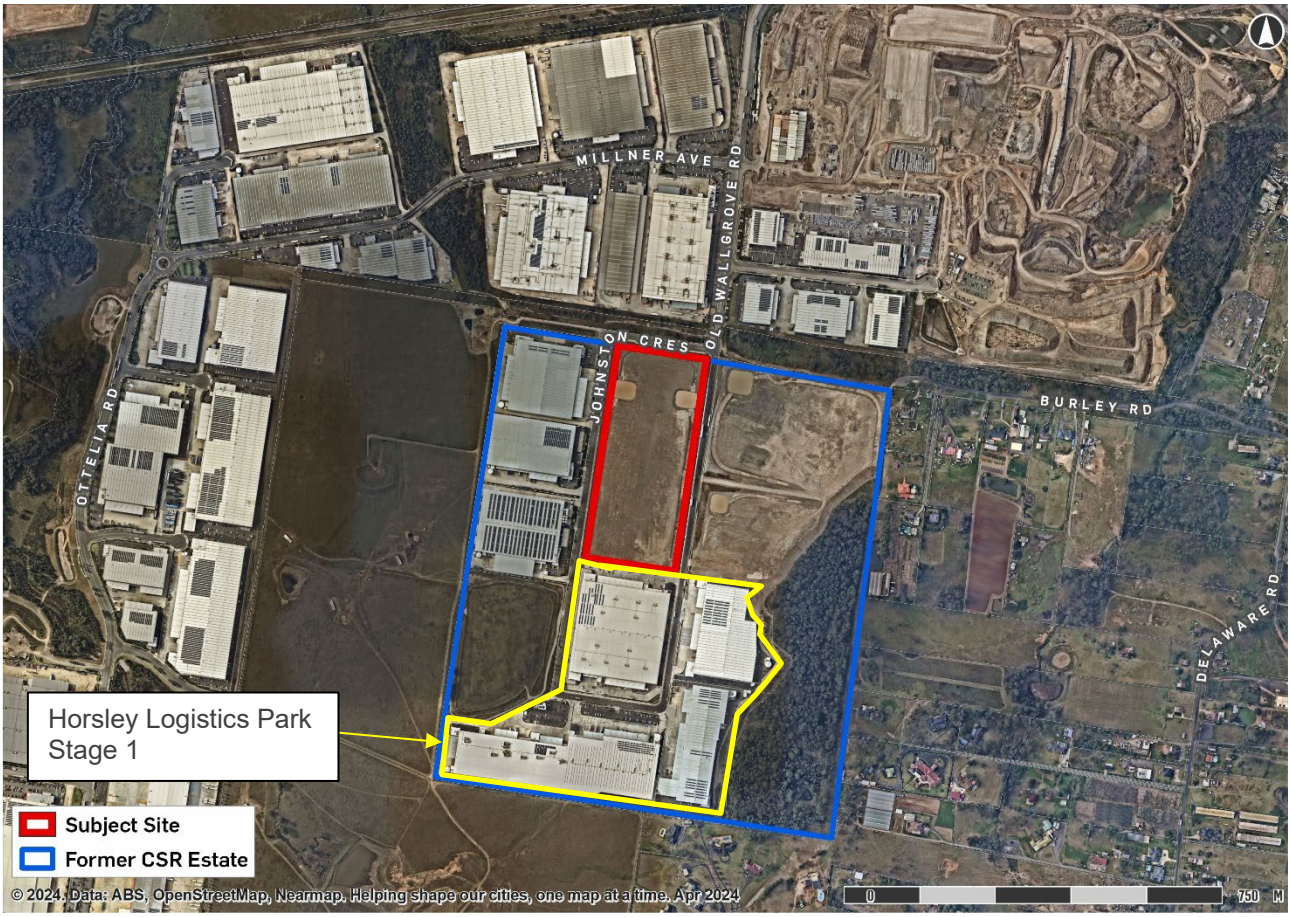
1.3. Project Background

1.3.1. The Former CSR Estate

The subject site is located within the former CSR Estate, which covers an area of approximately 74.48 ha within the strategically significant WSEA. The WSEA has long been identified as the single largest greenfield industrial precinct to serve the growing demand for industrial lands in the Sydney Metropolitan Area for the next 20 to 30 years.

This subject SSDA relates only to the area outlined in red (refer to Figure 4), which is known as Horsley Logistics Park Stage 2 development. Planning and development of the remaining lands within the former CSR Estate is subject to separate assessment and approval.

Figure 4 ESR Estate and the subject site



Source: Urbis

1.3.2. Site and Approval History

The former CSR Estate lands have been previously used for brickmaking and quarrying. The operation of the quarry resulted in the clearance of all vegetation, removal of original soils and the overall wholesale disturbance of the landscape across the entire Estate, which includes the subject site. CSR identified large portions of land within the former CSR Estate as surplus and available for alternate development. As the land was no longer being utilised for quarrying, CSR has proceeded to subdivide and stage out the future development of its land. This has resulted in a series of development applications lodged with and approved by Fairfield City Council (Council) and the NSW Land & Environment Court. Following the undertaking of remediation, fill and benching in accordance with these consents, various parcels have been sold to developers including ESR.

The subject site formed part of 'stage 3A' of the former CSR Estate (refer to Figure 5).

Figure 5 Approved Staging Plan – the former CSR Estate

Source: CSR Limited

A summary of the relevant approvals over the former CSR Estate are detailed in Table 2.

Table 2 DA History

DA NUMBER	DATE OF APPROVAL	CONSENTING AUTHORITY	DESCRIPTION OF DEVELOPMENT
893.1/2013	19/12/2013	NSW Land & Environment Court	Torrens Title subdivision to create 14 lots and 1 residue lot in 3 stages.
893.4/2013	18/06/2018	Fairfield City Council	Minor amendments to features of the subdivision in each of the 3 stages.
893.8/2013	15/09/2021	Fairfield City Council	Stage 3: Roadworks, K&G, SW Drainage, Bulk Earthworks, Regrading, Lay
893.9/2013	12/05/2021	Fairfield City Council	Further Staging of Stage 3 into Sub-Stages 3A, 3B and 3C, including subdivision design and earth works within each stage.
893.12/2013	10/03/2022	Fairfield City Council	Stage 3: Roadworks, K&G, SW Drainage, Bulk Earthworks, Regrading, Lay
65.1/2016	04/02/2016	Fairfield City Council	Construction of a landscape bund water supply pond to facilitate an existing Brick Factory in Lot 2 DP 1228114 in Stage 3.
86.1/2016	15/02/2016	Fairfield City Council	Subdivision to create two (2) Torrens Title lots.

292.1/2016	04/08/2016	Fairfield City Council	Construction of roadworks, stormwater drainage, associated construction works and sediment control along an 160m portion of Old Wallgrove Road.
437.1/2016	November 2016	Fairfield City Council	The Proposal involved the installation of a biofiltration trench to manage air quality persisting from the 5.88ha existing landfill lot on the site in the south-west corner of the former CSR Estate. The landfill site is currently subject to a Landfill Closure Plan (LCP) which was established in 1999 for the former Camide Landfill. The landfill is covered with a 1 metre clay cap to seal off the waste to allow decomposition in perpetuity. As part of DA437.1/2016 a Remediation Action Plan (RAP) was endorsed which highlighted the monitoring of landfill gas which had previously been undertaken since 2007 by CSR to comply with Environmental Protection License #123 in accordance with the Landfill Closure Plan prepared by Egis Consulting in 1999.
21.1/2020	23/11/2020	Fairfield City Council	Earthworks and Remediation of contamination cell Remediation of land in Stage 2 and 3 of the former CSR Estate by placing contaminated material from the former quarrying site in a containment cell excavation located on approved Lot 306 of DA 893.1/2013, which is located to the east of the subject site.  Lot 306 comprise a 10 metre high containment cell. The top of the containment cell will be clay capped with 2.5m of fill above the cell to a finished design level of approx. RL 86.5m.

287.1/2020 287.2/2020	27/07/2020	Fairfield City Council	Construction to small corner sections of Stage 3 - Stage 3: Construction of Roadworks, SW Drainage, Traffic Islands, Line Marking.
893.13/2013	12 May 2021	Fairfield City Council	Further staging of Stage 3 into Sub-Stages 3A, 3B and 3C. This SSDA relates to land identified as stage 3A. As part of the application, a RAP was provided by ERM dated December 2020 which concludes the site can be made suitable for the intended industrial land use subject to appropriate remediation in accordance with the RAP and SEPP 55. Remediation works for the subject site have been completed by the previous owner CSR. A Site Validation Report dated 28 April 2023 was prepared by ERM, which confirmed that recommendations of the RAP (2020) have been completed within the subject site and the site has been made suitable for the proposed commercial/industrial land use. The Site Validation Report also confirmed that it is appropriate to release the subject site area from any enforcement or obligation of management under Environmental Protection License #123 for the wider CSR estate, and that the subject site should not be subject to any future Environmental Management Plan. This Site Validation Report has been submitted with the EIS to supported the proposal and address item 16 ‘Contamination and Remediation’ of the SEARs.

The above table offers an overview of the approval history of the former CSR Estate. In terms of site preparation works to facilitate the future development at the subject site, the following staged works have been undertaken at the site as approved under **DA 893.1/2013.**

DA 893.1/2013 Approved Works – CSR Estate Subdivision, Earthworks & Infrastructure

DA893.1/2013 was lodged with Fairfield City Council on 19 December 2013 and determined by the LEC on 16 October 2015. The approval enabled the former CSR Estate to be subdivided and constructed in three stages. The subject site is located within Stage 3 area, and the approved works for Stage 3 included:

> *Stage 3*
>
> *The creation of 8 lots for future industrial purposes including Lot 5 being 2.015 ha in area, Lot 6 being 1.52 ha in area, Lot 7 being 1.50 ha in area, Lot 8 being 1.81 ha in area, Lot 9 being 1.82ha in area, Lot 10 being 4.02ha in area, Lot 11 being 4.19ha in area and Lot 12 being 4.19 ha in area;*
>
> *The construction, and continuation, of the proposed road from Stage 2 to intersect with Burley Road. The position of this intersection with Burley Road will allow for a four way intersection with Burley Road, Old Wallgrove Road and the proposed internal road. The intersection will be*

subject to future design in accordance with the upgrade of Burley Road to the Southern Link Road;

Bulk earthworks to create future development lot pads;

On lot stormwater detention and stormwater quality treatment for proposed Lots 5-12; and

Tree removal.

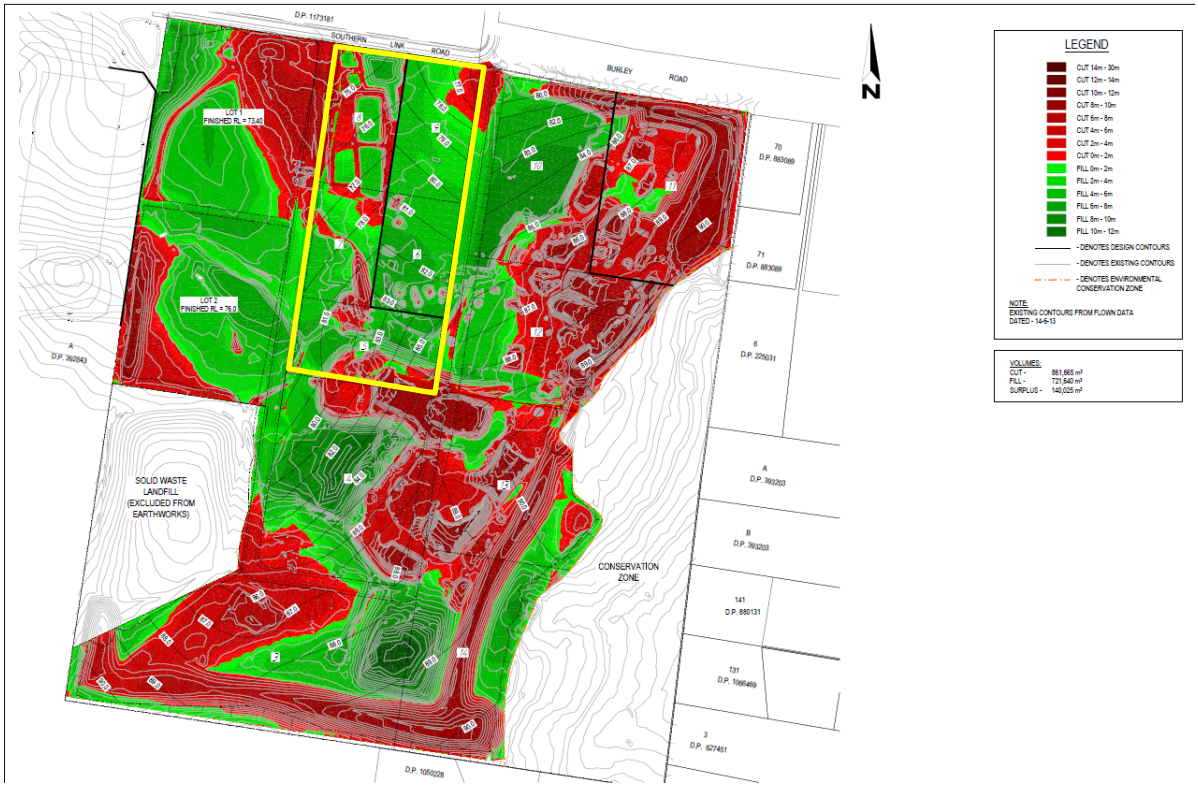
The indicative earthwork plan shown in Figure 6 was approved under DA893.1/2013, which demonstrates that the site has been cut and filled between 0-8m from the then existing ground levels.

DA 893.9/2013 Approved Works - Subdivision design of Stage 3 and earth works within each stage

DA 893/2013 was subsequently modified a number of times. Under the approved modification application DA893.9/2013, stage 3 of the former CSR state was further subdivided into three separate lots. As part of this modification, extent of earthworks within the subject site was also modified and approved by Council. Section showing the extent of cut and fill within the subject site is shown in Figure 7. The works as executed survey plan are attached at **Appendix D**.

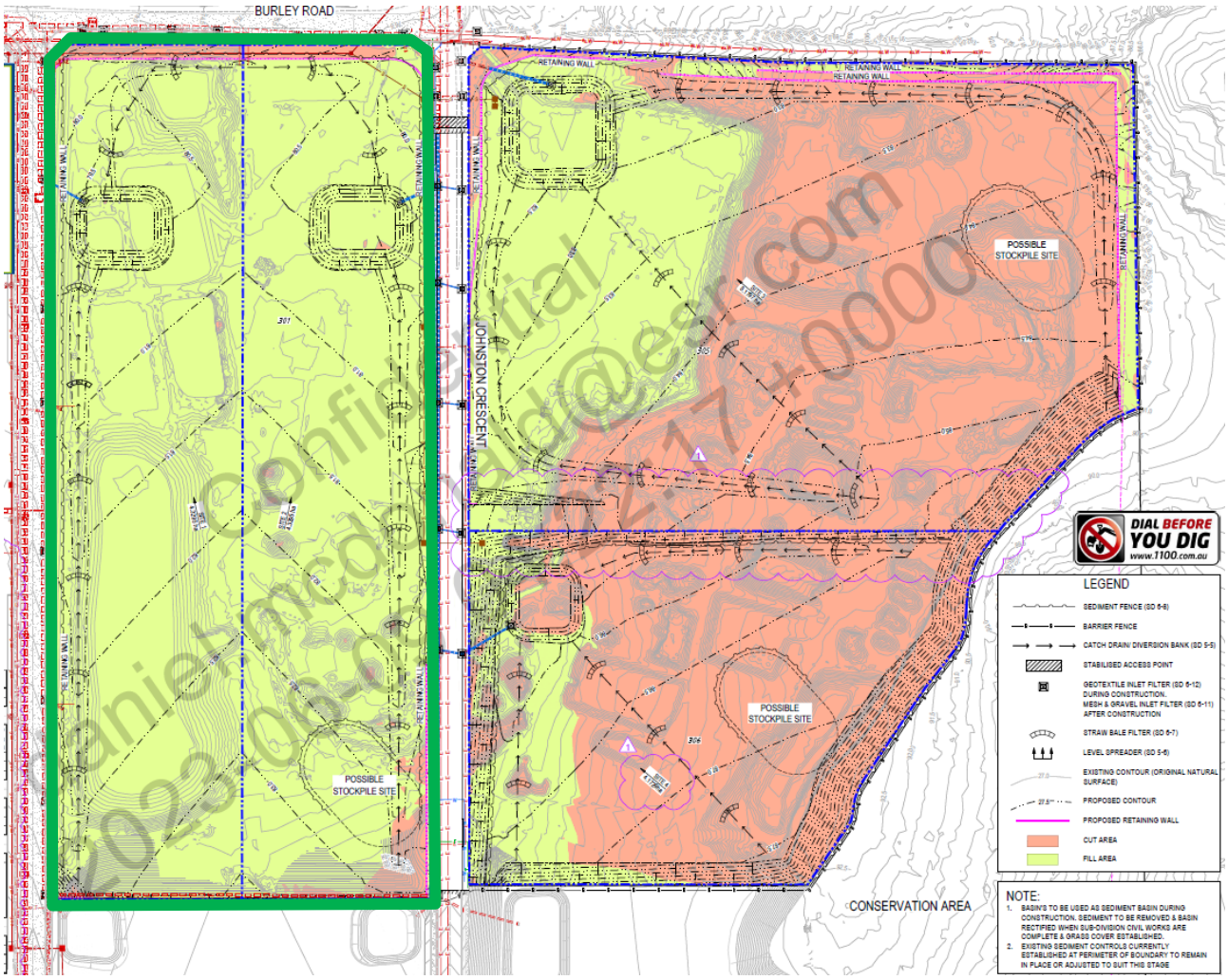
Bulk earthworks, including fill and benching of the site approved via DA893.1/2013 and DA893.9/2013 has since been completed. In addition, the remediation works approved under DA 21.1/2020 have removed contaminated material and soil at the subject site. Refer to Figure 8 for aerial photography (with site plan overlays) showing evolution of ground conditions on the site from March 2021 to January 2024.

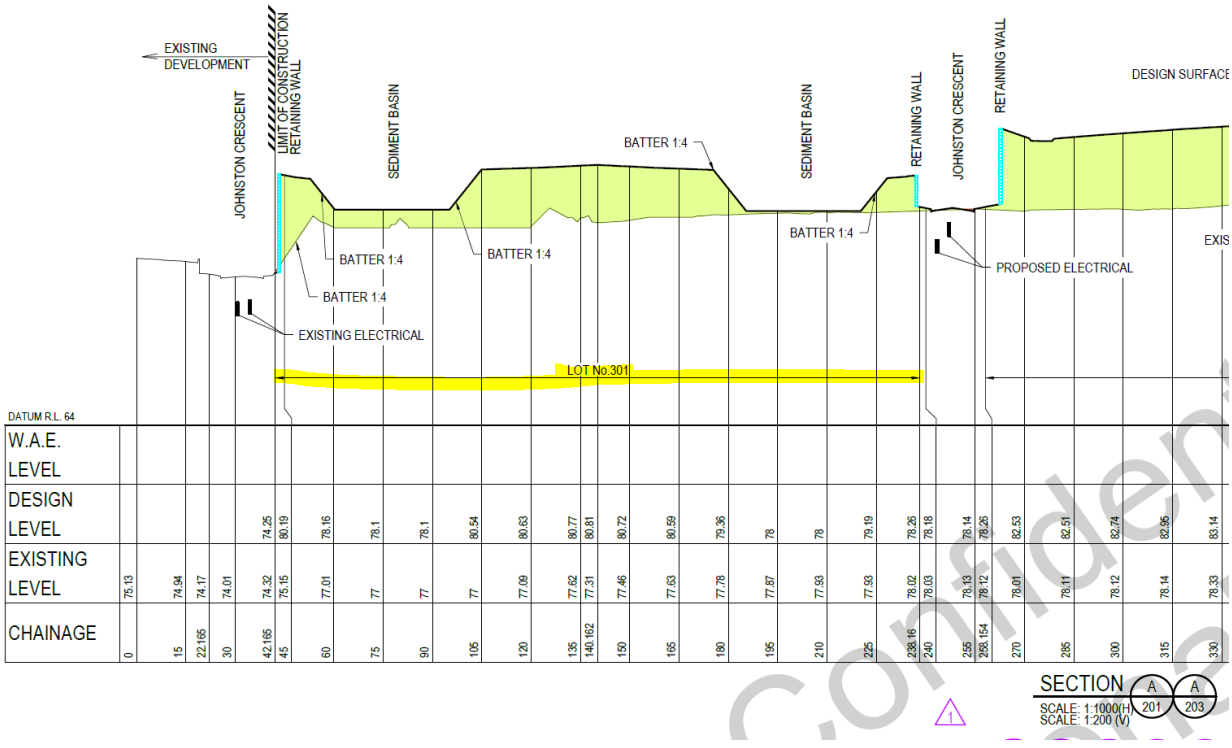
Figure 6 Approved Earthworks under DA893.1/2013 - subject site outlined in yellow

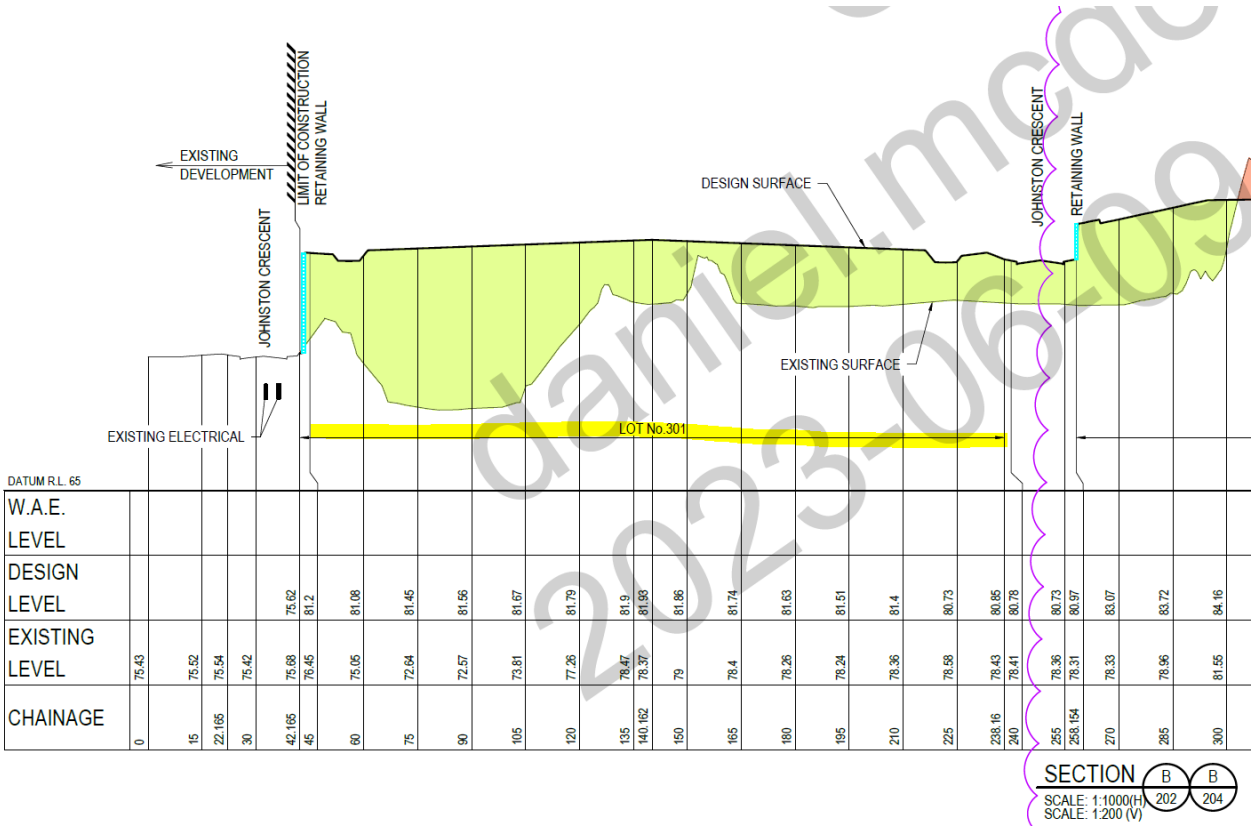


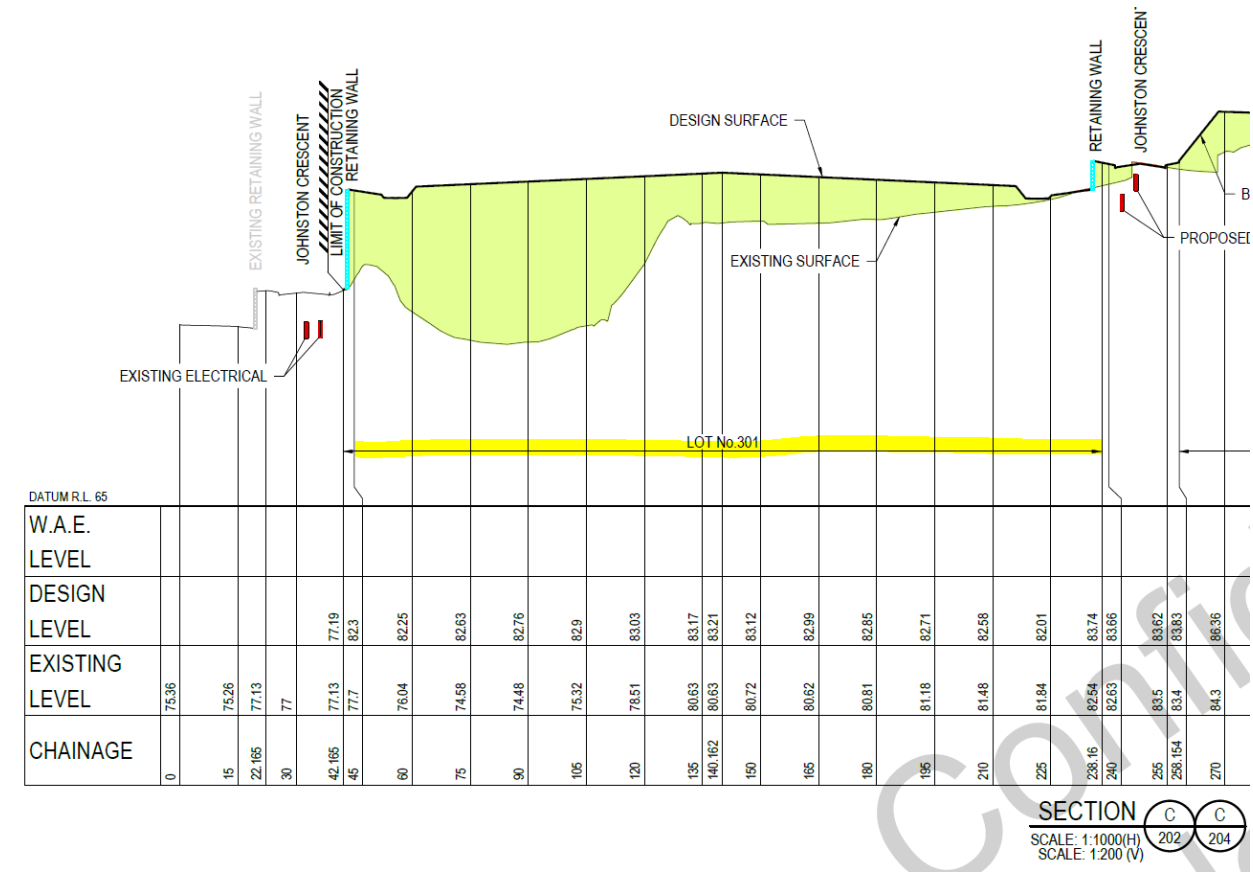
Source: Brown Smart Consulting

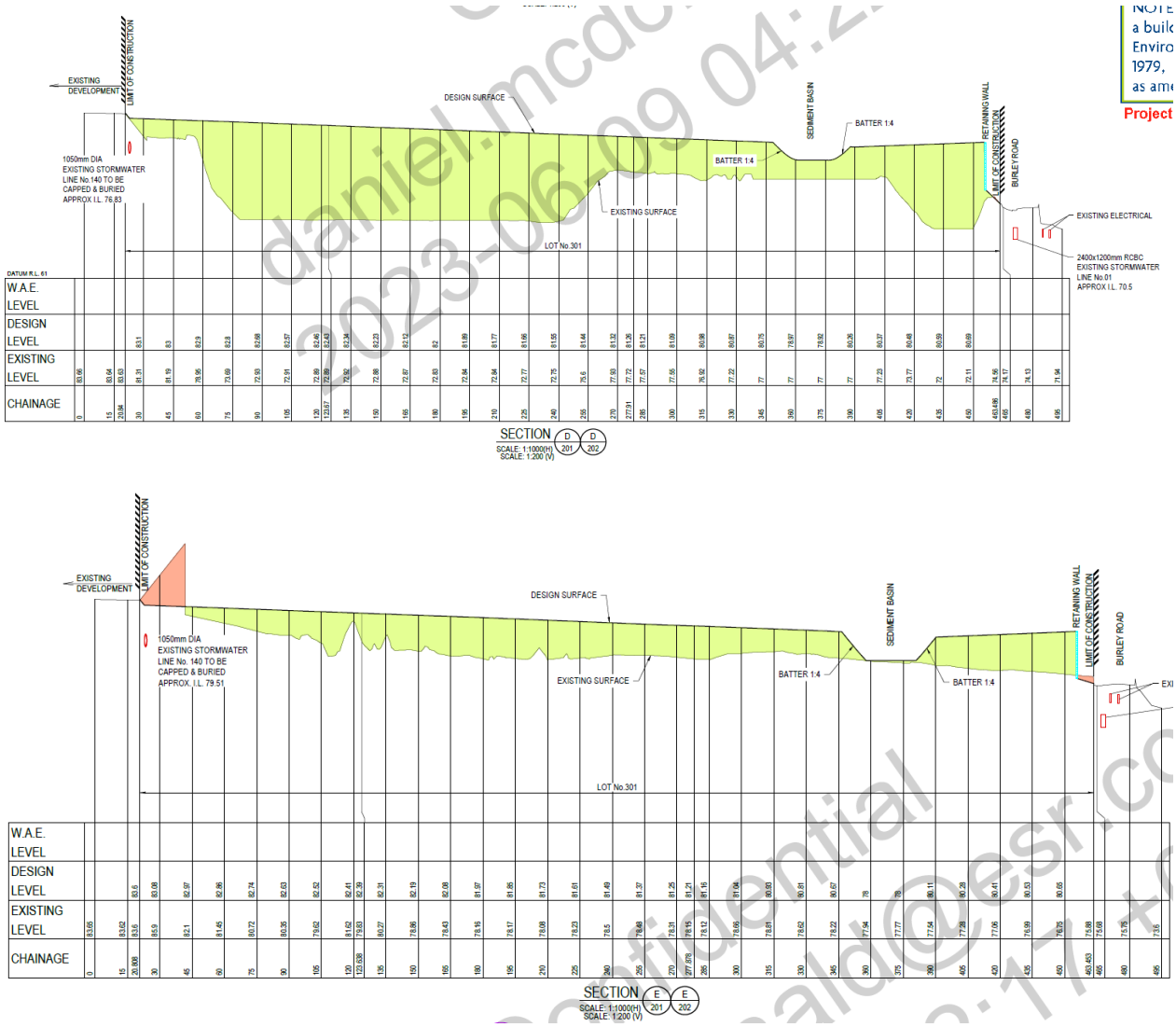
Figure 7 Approved Earthworks (plan and section) under DA893.9/2013 - subject site outlined in green





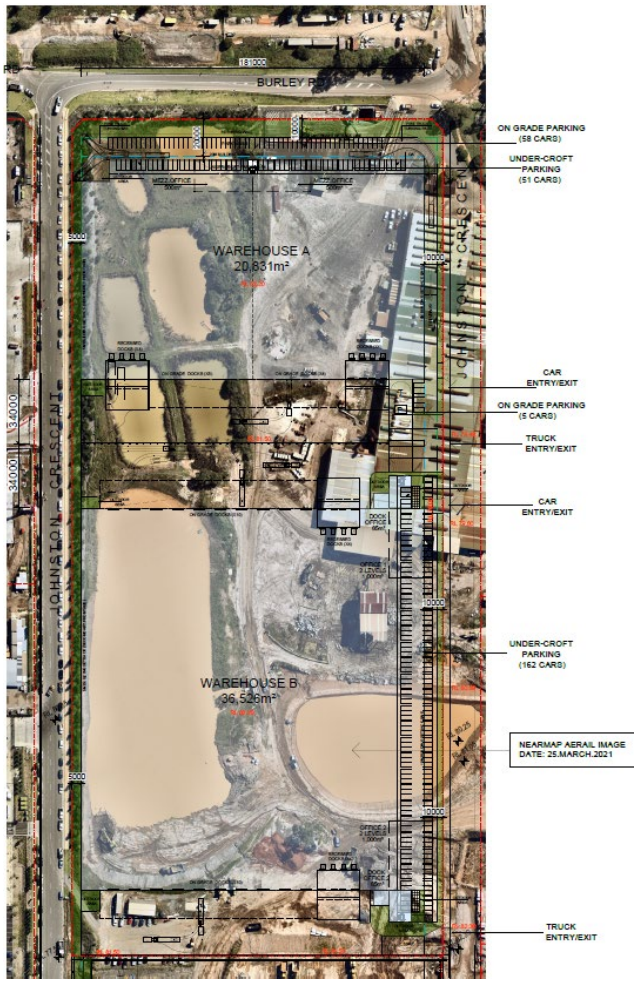






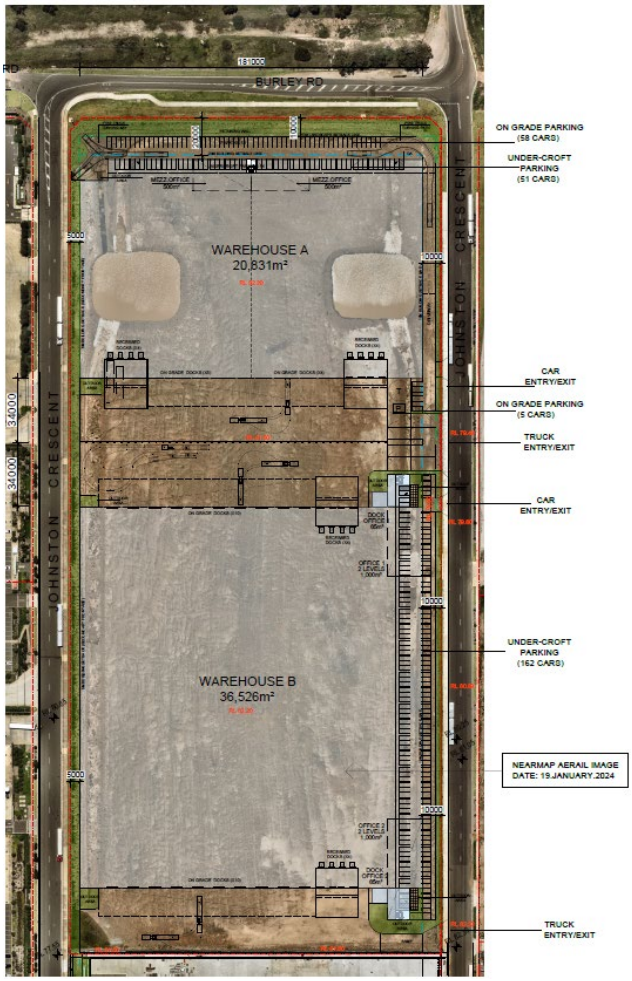
Source: Calibre/ESR

Figure 8 Site History – Ground condition of 2021 and 2024



Picture 1 Previous ground conditions - March 2021

Source: ESR



Picture 2 Existing ground conditions following earthworks - January 2024

Source: ESR

1.4. Related Development

The proposal seeks B-double vehicle access along Johnson Crescent (to the east). The northern portion of Johnson Crescent (to the east) is a local road and separate approval is required from Fairfield Council to allow for B-double vehicle access. The same approval from Council was required for Horsley Logical Park Stage 1 development to utilise Johnson Crescent (to the west). A concurrent application will be made with Council.

1.5. Restrictions and covenants

The site does not comprise any easement or covenant.

2. Strategic Context

This section identifies the key issues that are relevant to the project's locational and strategic context and provides a justification for the project in light of this context. The section also provides an analysis of alternatives that were considered as part of the scoping process.

2.1. Project Justification

The proposed development is aligned with the State, district and local strategic plans and policies applying to the site as outlined below.

2.1.1. Greater Sydney Region Plan: A Metropolis of Three Cities

The *Greater Sydney Region Plan* (**Region Plan**) provides the overarching strategic plan for growth and change in Sydney. It is a 20-year plan with a 40-year vision that seeks to transform Greater Sydney into a metropolis of three cities - the Western Parkland City, Central River City and Eastern Harbour City. It identifies key challenges facing Sydney including increasing the population to eight million by 2056, providing 817,000 new jobs and a requirement of 725,000 new homes by 2036.

Under this Plan, the site is identified as being within the Western Parklands City, the emerging of the three cities which is set to experience unparalleled population growth over the next 40 years. The city will be established on the strength of the new international Western Sydney Airport and Badgerys Creek Aerotropolis. A key objective of the Parkland City is to optimise infrastructure and business investment, employment and liveability outcomes.

The Region Plan states the WSEA will be the single largest new employment space in the Sydney Metropolitan Area. Located on the intersection of the M7 and M4 Motorways near Eastern Creek, it will significantly expand the employment potential in this part of Sydney. The Region Plan identifies the WSEA as a region of strategic industrial importance due to its proximity to the Badgerys Creek Aerotropolis and proposed new transport infrastructure.

The proposal will help provide employment opportunities to existing and future residents through the delivery of a high-quality warehouse and distribution facility. The site is strategically located at the periphery of the Fairfield LGA and in proximity to the Western Sydney Aerotropolis. The land uses are compatible with the employment lands identified in the area and will help support strategic vision of WESA and operations of the future airport.

The objectives and actions likely to have implications for the proposed development are listed and discussed below:

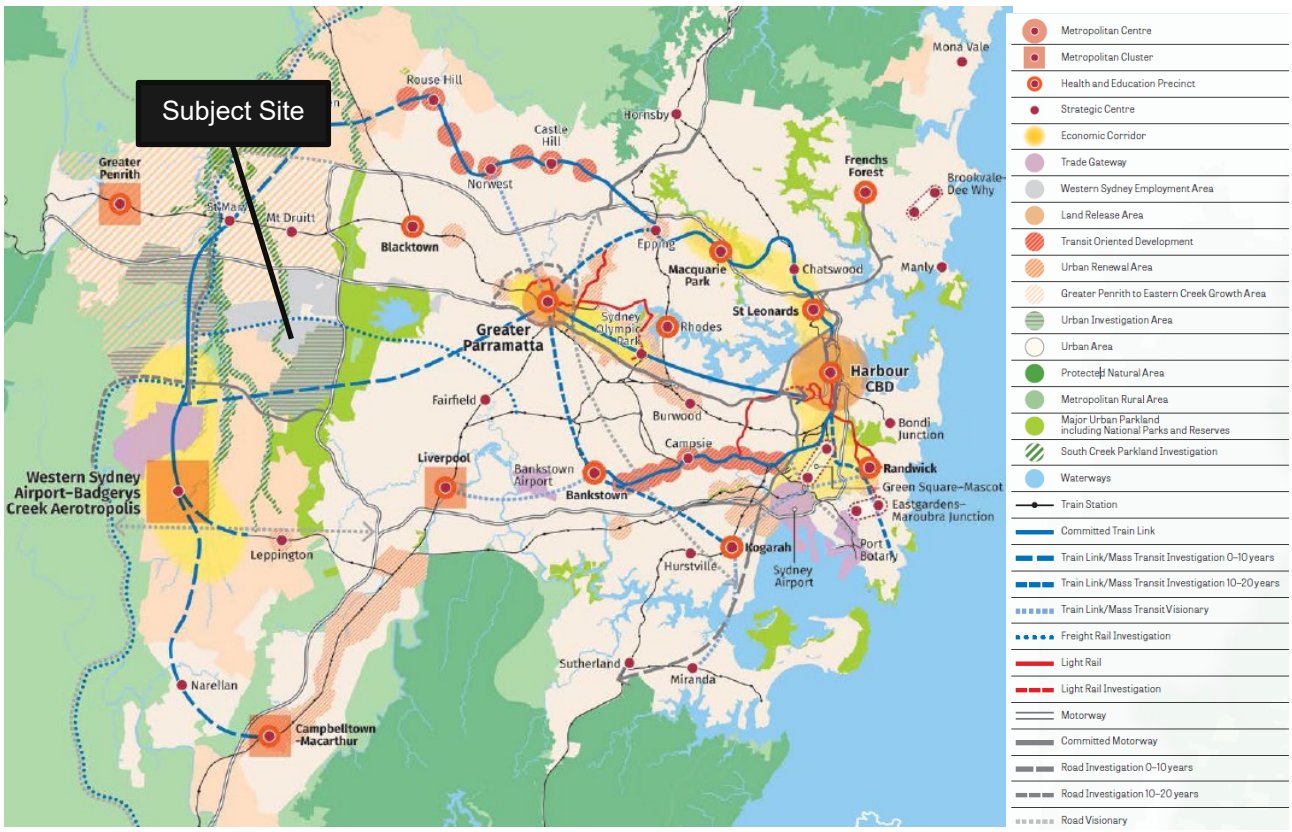
> *Objective 20 Western Sydney Airport and Badgerys Creek Aerotropolis are economic catalysts for Western Parkland City*

- The Western Sydney Employment Area's purpose was to become a long-term metropolitan land supply for industrial and employment activities. The proximity of the site to the Western Sydney Airport and Aerotropolis is attractive for future tenants, businesses and industries to locate. The proposed development is in a strategic location to leverage off these opportunities as well as provide compatible land uses to support the function of the aerotropolis.

> *Objective 23 Industrial and urban services land is planned, retained and managed*

- The proposed warehouse and distribution facility will strengthen the growth of the site into an industrial estate to support industrial and urban services within Western Sydney, unlocking economic investment for the site and broader locality.

Figure 9 Greater Sydney Region Plan Structure Plan



Source: Greater Sydney Region Plan

2.1.2. Our Greater Sydney 2056: Western City District Plan

The *Western District Plan* (**District Plan**) is a 20-year plan to manage growth in the context of economic, social and environmental matters to implement the objectives of the Greater Sydney Region Plan. The intent of the District Plan is to inform local strategic planning statements and local environmental plans, guiding the planning and support for growth and change across the district.

The District Plan contains strategic directions, planning priorities and actions that seek to implement the objectives and strategies within the Region Plan at the district-level. The Structure Plan identifies the key centres, economic and employment locations, land release and urban renewal areas and existing and future transport infrastructure to deliver growth aspirations.

Under this Plan, the site is identified as being within the Western Parklands City, the emerging of the three cities which is set to experience unparalleled population growth over the next 40 years. The site is located at the north west corner of Fairfield LGA and within the Western Sydney Employment Area. The site is located in a planned industrial and employment area that is highly suitable for the proposed development, and has connections to existing and planned infrastructure corridors. This includes the future Western Sydney Freight Line and Southern Link Road which is enabling infrastructure for economic opportunities.

The development will contribute to the job growth targets of the district, by providing construction and ongoing jobs for existing and future population. The proposal will deliver new jobs within the Fairfield LGA, and the Western Sydney Region.

The planning priorities and actions likely to have implications for the proposed development are listed and discussed below:

> *Planning Priority W7 Establishing the land use and transport structure to deliver a liveable, productive and sustainable Western Parkland City*

- The proposal will deliver employment lands in a location earmarked for future transport infrastructure investment. The site will benefit from existing and planned infrastructure corridors to aid in creating a productive Logistic Centre.

Planning Priority W8 Leveraging industry opportunities from the Western Sydney Airport and Badgerys Creek Aerotropolis

- This proposal is seeking consent to develop a warehouse and distribution facility which will complement the operations of the broader industrial estate. These works will unlock future opportunities to leverage the industrial and business growth of the Western Sydney Airport and the Aerotropolis. These works will optimise the site, enabling the transformation into a hub attracting investment, employment and industrial opportunities that would benefit the broader WSEA.

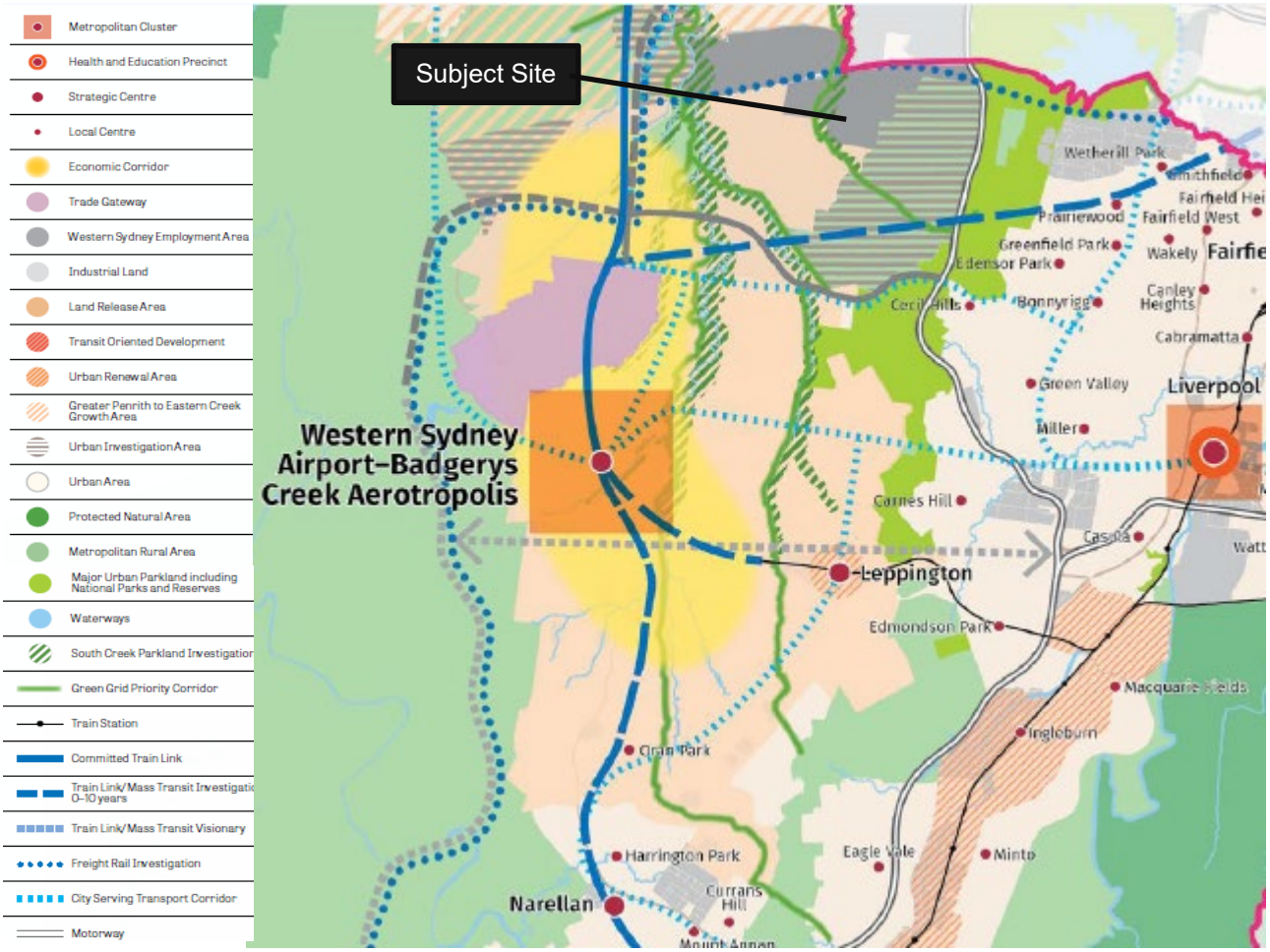
Planning Priority W10 Maximising freight and logistics opportunities and planning and managing industrial and urban services land

- The proposed works deliver additional industrial floorspace to carry out freight and logistics activities, which will generate investment and employment growth for the locality and broader Western City District.

Planning Priority W11 Growing investment, business opportunities and jobs in strategic centres

- The proposal will enable the critical redevelopment of the site to support an industrial precinct which will generate jobs as well as local and regional investment due to its strategic location within the WSEA. The proposed warehouse building will create construction and operation jobs at the subject site. It will support the broader site transformation into a precinct that generates considerable employment and business.

Figure 10 Western City District Plan Structure Plan



Source: Greater Sydney Region Plan

2.1.3. Fairfield Local Strategic Planning Statement

The Fairfield Local Strategic Planning Statement (**LSPS**): *Fairfield City 2040 A Land Use Vision*, provides the 20-year vision for land use within the LGA. This includes a set of clear planning priorities covering the needs of the city including jobs, homes, services and parks, as well as their location.

The Fairfield City Plan identifies five key themes to achieve the community's vision:

- Community Wellbeing – Healthy and Liveable Places
- Infrastructure and Places – Supporting Growth and Change
- Environmental Sustainability
- Strong and Resilient Economy
- Good Governance – Advocacy and Consultation

The LGA is made up of three distinctive areas comprising the western, central and eastern area. The site is located within the western area, characterised by rural lands, undulating landforms and scenic landscapes. The western area is in proximity to major motorways and regional intermodals, with the north western portion identified as the Western Sydney Employment Area (refer Figure 11). This area has the opportunity to leverage its proximity to the Western Sydney Airport (**WSA**).

The vision for Fairfield City to 2040 builds upon the existing strengths of the City. The local economy of Fairfield will benefit from maximising the advantages of its location as the gateway from WSA leading to Parramatta. The proposed warehouse is highly compatible for its location and ability to deliver on the theme to deliver a strong and resilient economy. Fairfield comprises a number of industrially zoned areas, with manufacturing, construction and retail trade accounting for the largest proportion of jobs. With the proximity of the WSA, it is envisaged that industry will become more diversified and enhance its urban services provision.

The following planning priorities under this LSPS theme will align with the proposed development:

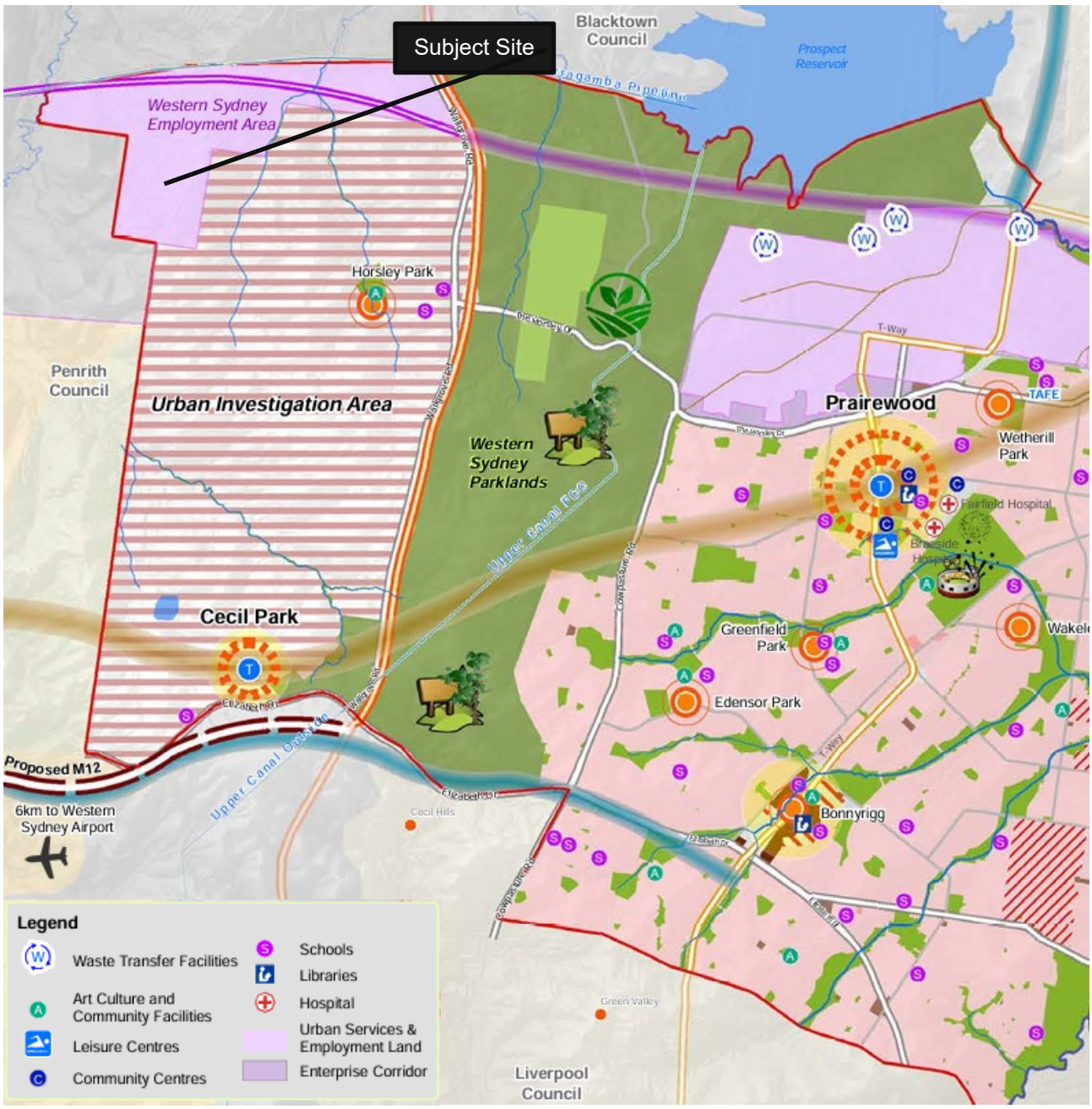
> *Planning Priority 11 Promote a robust economy which generates diverse services and job opportunities.*

- The proposed warehouse and distribution facility aligns with this priority by supporting Fairfield's economy through the delivery of industrial use and employment generation land in an area compatible for its land use.

> *Planning Priority 12 Plan for and manage urban services land.*

- The Strong and Resilient Economy Map highlights the site as providing urban services and employment land. The proposed development is in an established industrial area, making it a highly compatible location and is able to retain and strengthen employment opportunities in the LGA.

Figure 11 Fairfield LSPS Structure Plan - Western Area



Source: Fairfield LSPS

2.2. Key Features of Site and Surrounds

The site is located at 3 Johnston Crescent, Horsley Park within the Fairfield local government area (**LGA**). The site is legally described as Lot 301 in Deposited Plan 1244594 and is currently owned by ESR.

The subject site is part of the ESR Horsley Logistics Park development and is located to the north of the recently completed ESR Horsley Logistics Park Stage 1 development.

An aerial photograph of the site and the surrounds is illustrated in Figure 12**.** Photographs of the current site condition are provided in Figure 13**.**

Figure 12 Site location

Source: Urbis

Figure 13 Site and Locality Photographs

Picture 3 View looking at the HLP, from the south east corner.

Source: Google Maps

Picture 4 View looking at the HLP from the north east corner.

Source: Google Maps

Picture 5 Industrial warehouses north of the site, opposite Johnston Crescent

Source: Google Maps

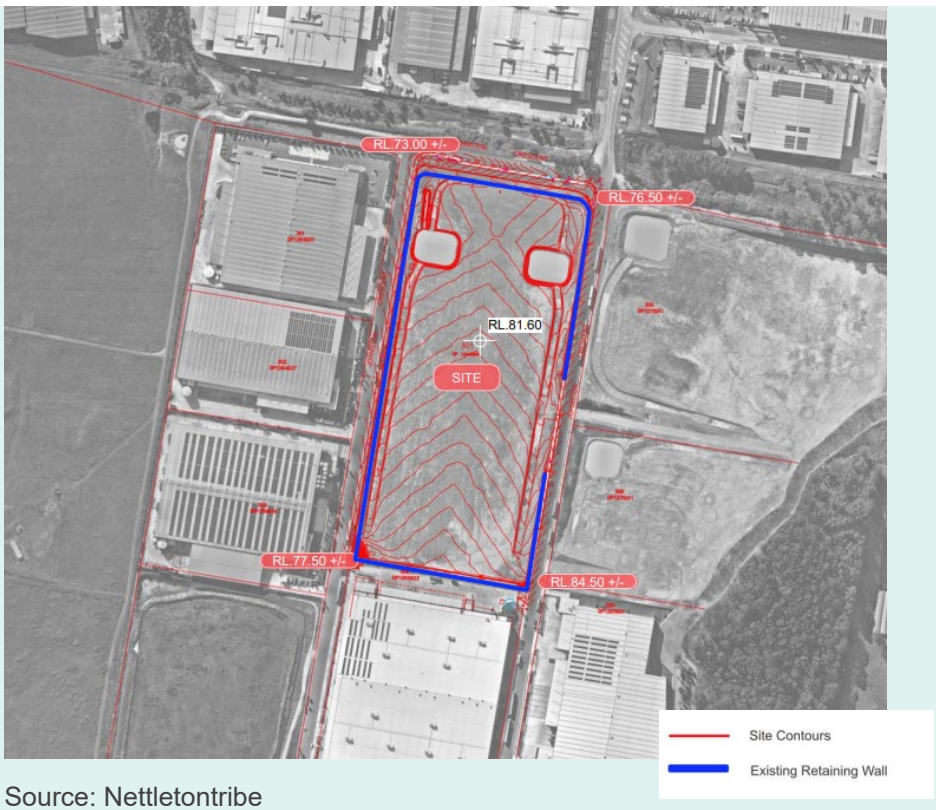
Picture 6 Industrial warehouses west of the site, opposite Johnston Crescent

Source: Google Maps

The key features of the site which have the potential to impact or be impacted by the proposed development are summarised in Table 3.

Table 3 Key Features of Site and Locality

DESCRIPTOR	SITE DETAILS
Land Configuration	The land proposed for development is rectangular in shape and has undergone fill and benching under DA893/2013. The longest length of the site is 442.8 metres, and the shortest length is 196 metres. The benched level slopes from approx. RL 83 to RL 80, but that the retaining walls along the western boundary are 3.5m high resulting in a level difference of 3.5m between Johnson Crescent and the benched levels at that location. The site comprise two sediment basins located towards the north of the site. Existing Retaining walls encircle the site.



Source: Nettletontribe

Land Ownership	The subject site is owned by ESR.
Existing Development	The site is currently cleared of existing development. As stated above, the site has undergone bulk earthworks to create future development lot pads under DA893/2013.
Local Context	The surrounding locality is described below: **North**: Land to the north of the site is the Oakdale East Industrial Estate (which is still under construction, with future development planned to the north and east) and Oakdale Central Industrial Estate (which has been completed). The existing development are largely medium-large format warehouse and distribution centres, industrial and manufacturing development. **East**: Land to the immediate east is currently cleared, with proposed works for a data centre via SSDA -63741210 (that application is currently in preparation stage). To the south of the proposed data centre comprises vacant industrial zoned land as well as natural bushland zoned C2 Environmental Conservation which will is required to be retained and managed. Further east and external to the Horsley Logistics Park are land zoned RU4 Primary Production Small Lots which are characterised by rural residential land use activities. **South**: Bounding the site to the south is the Horsley Logistics Park Stage 1 development approved and constructed under SSD-10436, comprising of multiple large warehouses. Further to the south is rural residential land holdings. In addition, the Western Sydney Airport is located south west of the site. **West**: Immediately west of the site is the Frasers Horsley Park industrial development and beyond that is vacant general industrial zoned land. Further west

is Oakdale Estate and the Mamre Road Precinct – all of which forms part of the Western Sydney Employment Area (WSEA).

Source: Nettletontribe

Regional Context	The site is located within the Fairfield LGA and is approximately 15km from the Penrith Central Business District (CBD), 17km from the Parramatta CBD, 10 kilometres north-east of the future Western Sydney International airport and 35km from Sydney CBD. The site is within the Western Sydney Employment Area and within a developing employment precinct, including the ESR Horsley Logistics Park, Oakdale Central, Oakdale South and Horsley Park Employment Precinct. It is also close to other established and emerging employment-generating precincts, including Eastern Creek to the north, Huntingwood to the north- east, Wetherill Park and Mamre Road West to the north-west and Wetherill Park to the east
Infrastructure	The site does not benefit from existing public transport services in its vicinity. The nearest bus stop is at Delaware Road / Burley Road, 1,200 metres beyond the Site. The site will be well serviced by infrastructure. The signalised intersection of Lenore Drive and Old Wallgrove Road at Eastern Creek is approximately 2 kilometres to the north, providing access to Wallgrove Road and the Westlink M7 Motorway to the east and Erskine Park Road and Mamre Road to the west. Each of these roads provides access to the M4 Motorway to the north and M5 Motorway to the south.
Site Access	The Site is accessed via Johnston Crescent, and an access road off Reserve Road and Burley Road which was constructed as a part of DA 893.1/2013 and extended into an internal loop road.
Services	Existing services will be retained or augmented. New services will be established as required.

Contamination	Remediation works have been completed by the previous owner CSR under local DAs. A Site Audit Report was prepared which assessed the Stage 3A area to be made suitable for the proposed commercial and industrial land uses. Refer to **Section 6.2.8** of this report for further information.
Stormwater and Flooding	Flood risk assessment from Ropes Creek or other regional flooding is discussed in **Section 6.2.6** of the EIS.
Bushfire Prone Land	The subject site is not identified as bushfire prone land.
Flora and Fauna	Vegetation clearing and tree removal was undertaken as part of DA 893.1/2013. As evident on the most recent aerial photograph of the site (refer to Figure 14), the site does not comprise any vegetation or potential habitat for threatened species.
Aboriginal Heritage	No aboriginal artifacts registered on the site under AHIMs register. The site has been headily disturbed and filled in accordance with 893.9/2013 consent.
European Heritage	The site is not a heritage item nor within a conservation area. The site is not in proximity to any heritage items.

Figure 14 Locality Photographs (taken from drone shots)

Picture 7 Taken from north looking towards south of the site

Picture 8 Taken from south looking towards north of the site

Source: Geo Scapes

2.3. Cumulative Impacts with Future Projects

The site is located within an existing industrial area of Horsley Park, characterised by multi-sized warehouses for supply, manufacturing and distribution.

Approved and likely future developments which may be relevant in the cumulative impact assessment of the proposal are summarised in Table 4.

Cumulative assessment will comprise the operations of existing developments. This includes the Horsley Logistics Park Stage 1 development and the Frasers's development to the immediate west, as well as the approved Oakdale East Estate to the north as noted in the table below.

Table 4 Approved and Likely Future Developments

DA REFERENCE	DEVELOPMENT DESCRIPTION	CURRENT STATUS
SSD-63741210 3-5 Johnston Crescent, Horsley Park	Construction and operation of a data centre comprising of six data centre buildings with a maximum height of 38 m and an operational capacity of 250 MW, including substation, earthworks, car parking, landscaping and ancillary works.	Response to Submission
SSD-37486043 2-10 Old Wallgrove Rd Horsley Park	Oakdale East Estate Concept masterplan for an industrial estate and Stage 1 works including intersection upgrades, bulk earthworks, internal roads, services, expansion of an existing warehouse in Precinct 1 and construction and operation of a warehouse in Precinct 3.	Approved 11/10/2023

	Mod 1 Modify the building layout in Precinct 1 and Precinct 3.	MOD Approved 21/02/2024 Not yet constructed

The potential cumulative impacts of the project are addressed in **Section 6** of the EIS in accordance with the DPIE *Assessing Cumulative Impacts* guidelines.

2.4. Feasible Alternatives

Clause 192(c) of the *Environmental Planning and Assessment Regulation 2021* (**the Regulation**) requires an analysis of any feasible alternatives to the proposed development, including the consequences of not carrying out the development.

ESR identified three project alternatives which were considered in respect to the identified need for the proposed industrial warehouse. Each of these options is listed and discussed in the following table.

Table 5 Project Alternatives

OPTION	ASSESSMENT
Option 1 - Do Nothing	The current state of the site, remaining as a cleared, vacant property is not in alignment with its zoning and development potential. The undeveloped land will not contribute to Horsley Logistics Park and fail to deliver upon the broader objectives of the WSEA. If the site remains undeveloped, it will not provide employment lands in a strategic location. In addition, the site's proximity to the WSA emphasises the need for a proactive approach to provide compatible land uses that will support the transformation of Western Sydney. Maintaining the site in its current state, also known as the 'do nothing' approach, is not a long-term solution. It overlooks the site's inherent opportunities, such as its proximity to the Northern Gateway of the Aerotropolis and employment lands as identified in the LSPS. Embracing such an approach would not only be inconsistent with the site's key features and strategic significance but would also result in its underutilisation, overlooking its potential to contribute meaningfully to the industrial lands supply and employment opportunities.
Option 2 - Alternative Location	Consideration was given to carrying out development on alternative sites, however, these were dismissed as follows: ▪ The sites were close to sensitive land activities, including residential development, and potential impacts could not be mitigated. ▪ The sites were not in proximity to adequate transport infrastructure and would not form part of the broader business park. ▪ Sites were physically constrained and could not accommodate the required scale of development. ▪ Sites were constrained by environmental sensitive areas, including vegetation, heritage or bushfire. The subject site is within a large industrial estate, it is cleared and prepared for the intended industrial use, therefore it is the most suitable land for the proposed development.

Option 3 – Alternative Layouts	Alternative layouts were considered as part of the design and development process. The schemes were ultimately ruled out as: ▪ Space and hardstand configuration did not meet the needs of tenants ▪ Significant changes to RLs, which would require amendments to retaining walls ▪ Increase ramping requirements, which would make truck access difficult to enter and leave the site
Option 4 – The Proposal	The siting and design of the proposed warehouses were resolved through a comprehensive analysis of the site opportunities and constraints. This chosen approach represents the most suitable pathway forward. It ensures an efficient and organised development outcome that contributes to the efficient development of the broader ESR estate, whilst also minimising impacts. The proposal was identified as being the most suitable option to achieve the project objectives for the following reasons: ▪ The site will form part of the Hosley Logical Park development, which is strategically located in the Western Sydney Employment Area and in proximity to the WSA. ▪ The site will benefit from co-location to other industrial uses within the ESR estate, which will support business activity in Fairfield and Western Sydney. ▪ The proposal is compatible with the local context and will result in minimal impacts to the environment through the implementation of suitable mitigation measures where required. The development can be achieved without having unacceptable environmental impacts in relation to traffic, access, noise and visual impacts.

3. Project Description

The following sections of the EIS summarise the key numeric components of the proposed development and describe the demolition, site preparation, construction and operational phases in further detail.

3.1. Project Overview

The key components of the proposed development are summarised in Table 6. A copy of the architectural concept drawings is provided as **Appendix E**.

Table 6 Project Details

DESCRIPTOR	PROJECT DETAILS
Project Area	The site has a total area of 86,721m^2.
Site Description	Lot 301 in Deposited Plan 1244594.
Project Description	The project comprises the construction of two warehouse buildings with ancillary offices. The two buildings occupy a single lot comprising of a continuous pad level, with hardstand areas and outdoor staff areas. Both buildings will support warehouse and distribution use and have the same owner. Warehouse B will be occupied by a single tenant and Warehouse A will be occupied by two tenants. The proposal includes minor site grading works from the current pad levels (maximum depth 2.25m) and filling of the existing sediment basins. The proposal will construct internal access roads, with separate truck and car entries via Johnston Crescent along the eastern boundary. On lot signage including warehouse tenant signage and wayfinding signage are proposed.
GFA	Total GFA of 55,900sqm, split across two buildings: ▪ Warehouse A (two tenants): 20,250sqm Warehouse A1 GFA: 10,825sqm Office A1 GFA: 520sqm Warehouse A2 GFA: 8,388sqm Office A2 GFA: 517sqm ▪ Warehouse B (single tenant): 35,650sqm Warehouse GFA: 33,581sqm Office GFA: 2,069sqm
Maximum Height	14.6 metres measured from the new established ground level to ridge height, and a total 18.1 metres measured from the undercroft carpark.
Parking Spaces	254 onsite parking spaces, located on grade and under-croft.
Landscaped area	Total landscaped and permeable paving area: 5,382m^2 (6.21%)

Hours of Operation	24 hour and 7 days a week
Capital Investment Value	$96,686,000 (excluding GST)

3.2. Detailed Description

3.2.1. Site Preparation Works

Site preparation works are proposed including the fencing of the site, the construction of a site compound including site accommodation, staff parking and machinery and goods storage, and stockpile locations for fill, spoil.

Cut earthworks over the site will be minor and no major changes or impacts to groundwater is expected. According to the Civil Plans (**Appendix CC**) the proposed quantum of cut and fill is proposed:

- Topsoil Strip: - 17,200 (to be exported)
- Cut: - 38,300m^3
- Fill: + 54,770m^3
- Difference: + 33,6700m^3

3.2.2. Warehouse Layout and Design

3.2.2.1. Site Layout

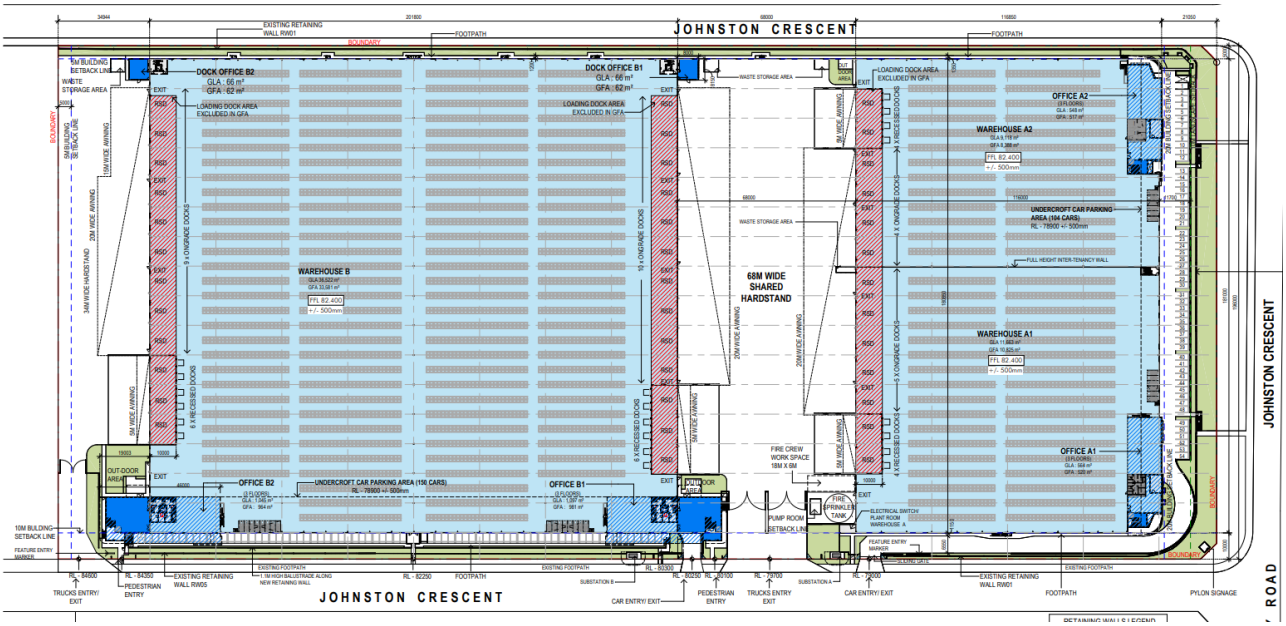
The site layout comprises of two buildings located at the northern (Warehouse A) and southern (Warehouse B) parts of the site as shown in Figure 15. Landscaped setbacks are provided at the northern, eastern and western site boundaries. A 68m wide shared hardstand is centrally located between the two warehouses to support 19 on grade docks and 14 recessed docks which are split across both warehouses. An additional 34m wide hardstand is located to the south of Warehouse B and supports 9 at -grade docks and 6 recessed docks.

Warehouse B comprises two separate offices, one located to the north of the warehouse, and one is located to the south. This arrangement is required to meet the operational requirement of the development. The offices will be occupied by staff from the same tenant and is to assist with supervising the outbound and inbound operation of the warehouse, which occurs at different locations of the building. Having two separate offices will therefore assist future tenant to resource their staff accordingly.

The under-croft car parking areas are located adjacent to each warehouse buildings. The parking for Warehouse A is located along the northern boundary, and parking for Warehouse B is located along the eastern boundary. The location of the parking areas ensures a safe path of travel is provided for staff and visitors, and it is separated from truck movements.

Overall, the building layout respond to its three street frontages and the orientation of the buildings is to support efficient and seamless logistics operations. The proposed layout maximises daylight access as well as optimise vehicular and pedestrian access to and from the site.

Figure 15 Site Plan



Source: Nettleton Tribe

3.2.2.2. Design and Built Form

The detailed design of each warehouse building is described as follows:

- Warehouse A (North) – two tenants:
  - 19,213 m^2 of warehouse area split across two tenancies, comprising of:
    - Warehouse A1: 10,825 m^2
    - Warehouse A2: 8,388 m^2
  - 1,037m^2 of office area split across two tenancies and each with two levels. It comprises:
    - Office A1: 520 m^2
    - Office A2: 517 m^2
  - Car parking is provided along the northern building setback accessed via the eastern car entry and exit. Pedestrian pathways for employees have been provided along the northern façade via stairs from the street frontage if entering from the north, and dedicated footpath along the vehicular entrance and circulation to the carpark if accessing from the east.
  - Warehouse services such as a pump room, sprinkler tank, and substation have been included at the southeastern corner of Warehouse A.
- Warehouse B (South) – single tenant:
  - 33,581 m^2 of warehouse area.
  - 2,069m^2 of office area split across two spaces and each with two levels. It comprises:
    - Office B1: 981 m^2
    - Office B2: 964 m^2
    - Dock office B1: 62m^2
    - Dock office B2: 62m^2
  - Car parking is along the eastern building façade, including undercroft areas below the building ground floor. Vehicular parking is accessed via the vehicular accessway at the eastern street frontage, and pedestrian access is obtained via two pedestrian pathways adjacent to each office at the eastern building façade.

The fit-out of the warehouse and ancillary office space within each tenancy is shown in the architectural drawings. Indicative racking layouts have been provided based on the speculative nature of the proposal. The racking may be modified to tenant specification during the post consent detailed design phase, subject to further planning approvals if required.

The proposed development reflects best-practice design to deliver a modern logistics precinct for warehouse and distribution uses. The design seeks to align with the expected character and aesthetic of the industrial use and broader ESR estate.

The proposed maximum height of each warehouse is 14.6 metres, at the top of the low-angled pitched roof. A portion of the Warehouse B rooftop will support the provision of solar panels. This is identified for the northern half of the roof area.

Indicative locations of roof mounted exhaust fans are shown on the elevations.

The built form seeks to create visual interest through the selection of materiality and façade articulation. As the building addresses three street frontages, the design ensures visual impacts are minimised at all interfaces. The low angle pitched roof creates a simple geometric façade that employs a range of complementary materials and colours to enhance visual appeal. This combination breaks up the elevation and reduces the perceived bulk of the building. The addition of ESR brand colours at portions of the façade enhances the dynamic geometry achieved by the designs.

The office components are strategically placed to address street frontages to enhance architectural composition and visual appeal. Colour and textural contrasts are further introduced at the offices which employ neutral, timber looking materials to delineate these components from the broader building as well as define the buildings corner. Window lengths vary, stretching across the three office levels with vertical blades which curve at the building corners. As this feature highlights the design at the street frontages, it is also a functional feature to effectively shade the internal offices.

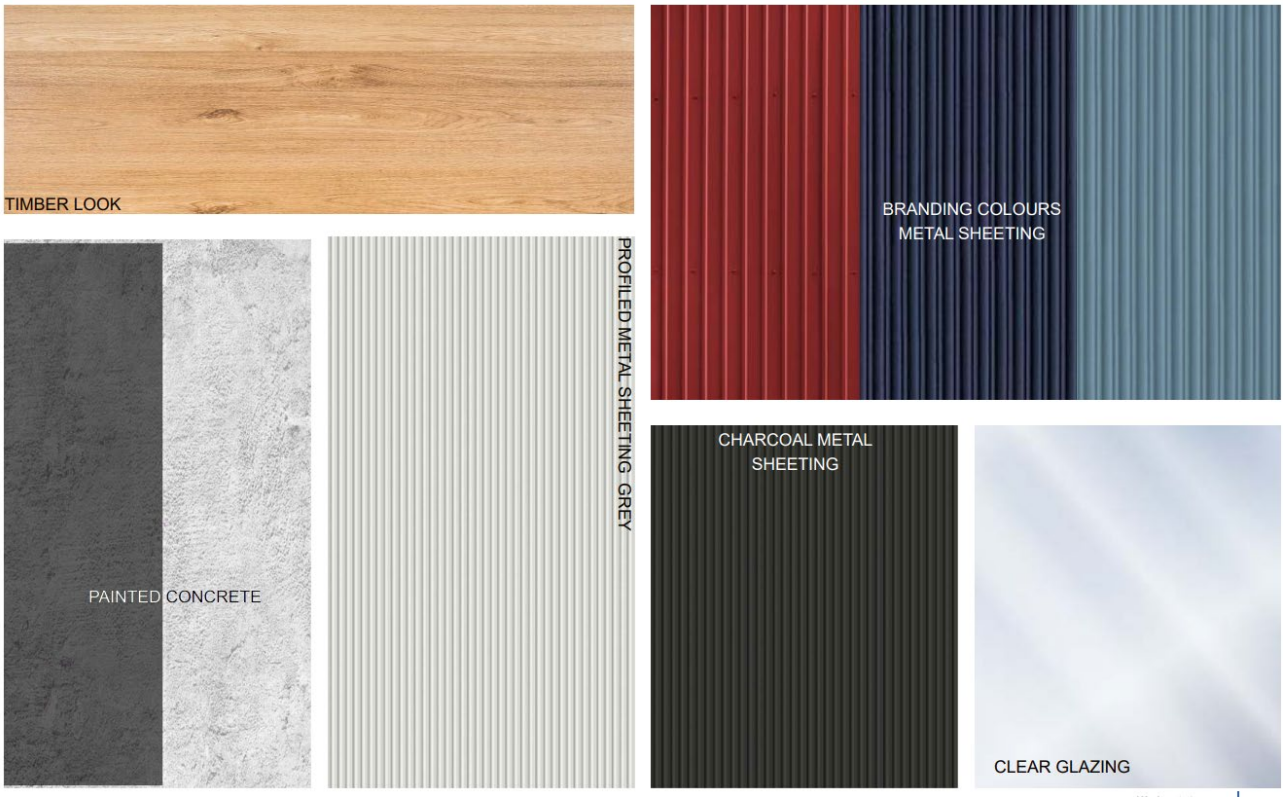
Figure 16 Perspectives

Source: Nettleton Tribe

3.2.2.3. Materials and Finishes

The Proposal has been designed with external materials and finishes that complement the existing Horsley Logics Park stage 1 development. The building materials are durable, hardwearing, low maintenance and evoke smart building design. The proposed external materials are detailed in **Figure 17** and **Appendix E**.

Figure 17 External Materials and Finishes Schedule



Source: Nettletontribe

3.2.3. Landscaping

Landscape design will be completed in accordance with the Landscape plans prepared by Scape Design at **Appendix L**. The landscape strategy seeks to integrate high quality public domain outcomes and resilient strategies.

Planting is provided along all three street frontages to soften the interface with the streetscape. 211 trees are proposed to be planted and embellished with shrubs and groundcover to create a green, attractive landscape treatment. The development will include a range of native species to achieve a total landscape area of 5,382m^2 (including permeable paving), equating to 6.21% of the site area. In addition, the proposed canopy cover for the site is 5.97%.

The following minimum landscape setbacks are achieved:

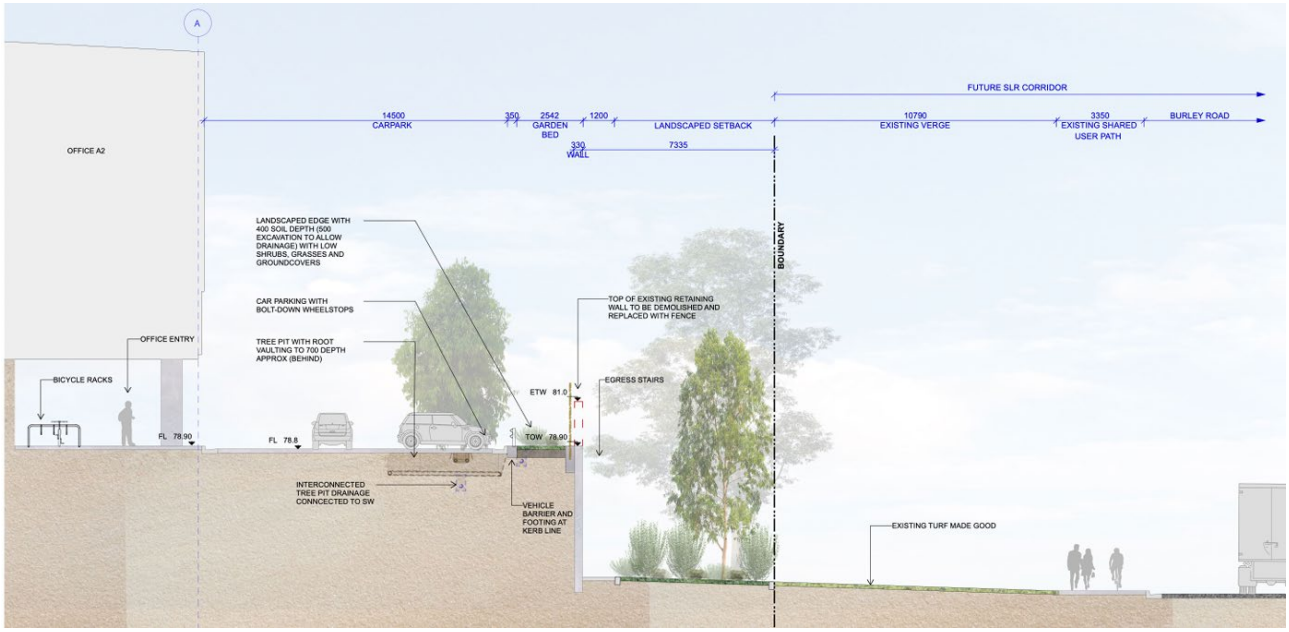
- Burley Road (North): 9.8m primary frontage landscape setback
- Johnston Crescent (East): approx. 5m
- Johnston Crescent (West): 4m

The site consists of existing retaining walls at the boundaries, which will be integrated with the landscape treatment (e.g. grasses and groundcover that spills over the wall) to soften the hard edges and perceived bulk. An entry landscape feature with climbers is proposed to mark the Estate from Johnson Crescent. Refer to the landscape sections in Figure 18.

The primary frontage to Burley Road includes a 9.8m landscape setback including trees, ground cover planting and egress stairs at the retaining wall for pedestrians to access the site. The considerable, dense planting is designed to filter views to the retaining wall and warehouse to enhance visual amenity to the streetscape. The section plan demonstrates the existing retaining wall incorporates landscape treatment to soften the property edge and allow for improved landscaped design outcomes.

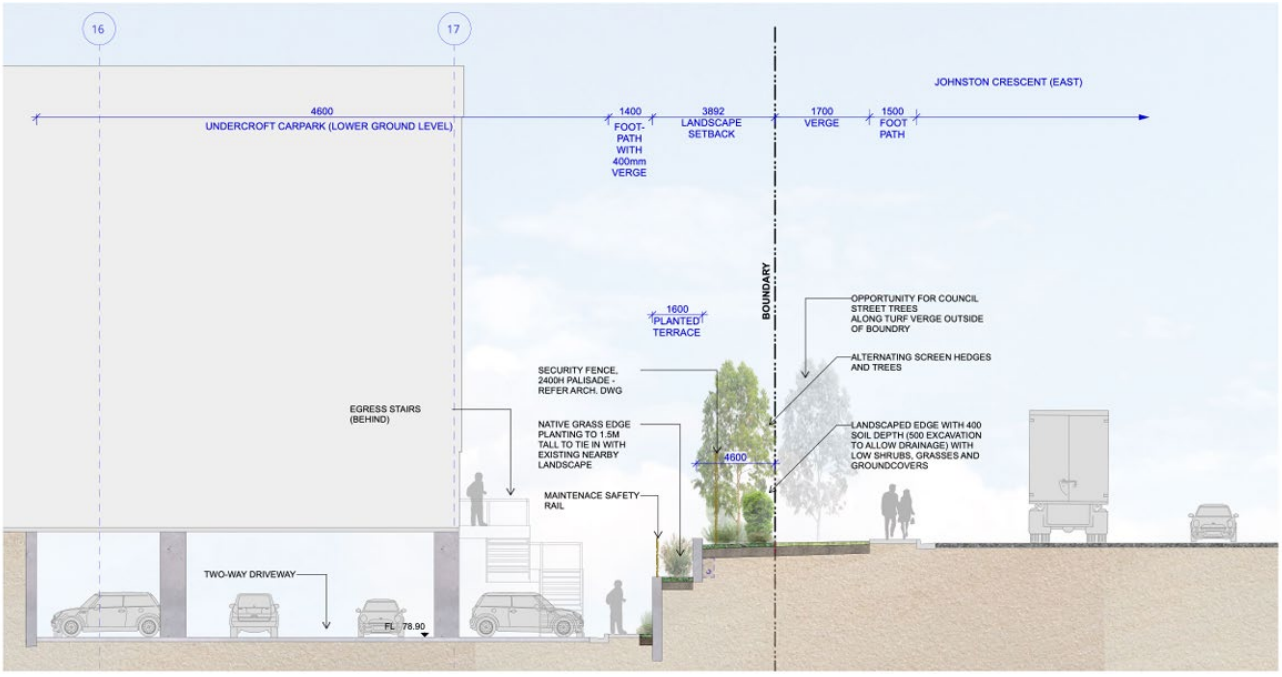
Landscape setback is also provided in front of Warehouse B and along this section of Johston Crescent. The landscape treatment includes a multi layered planted setback to the stepped retaining wall. The landscape setback will also help to screen the car parking area.

Figure 18 Landscape Sections



Picture 9 Warehouse A – Burley Road Section

Source: Scape Design



Picture 10 Warehouse B – Johnston Crescent (East) Section

Source: Scape Design

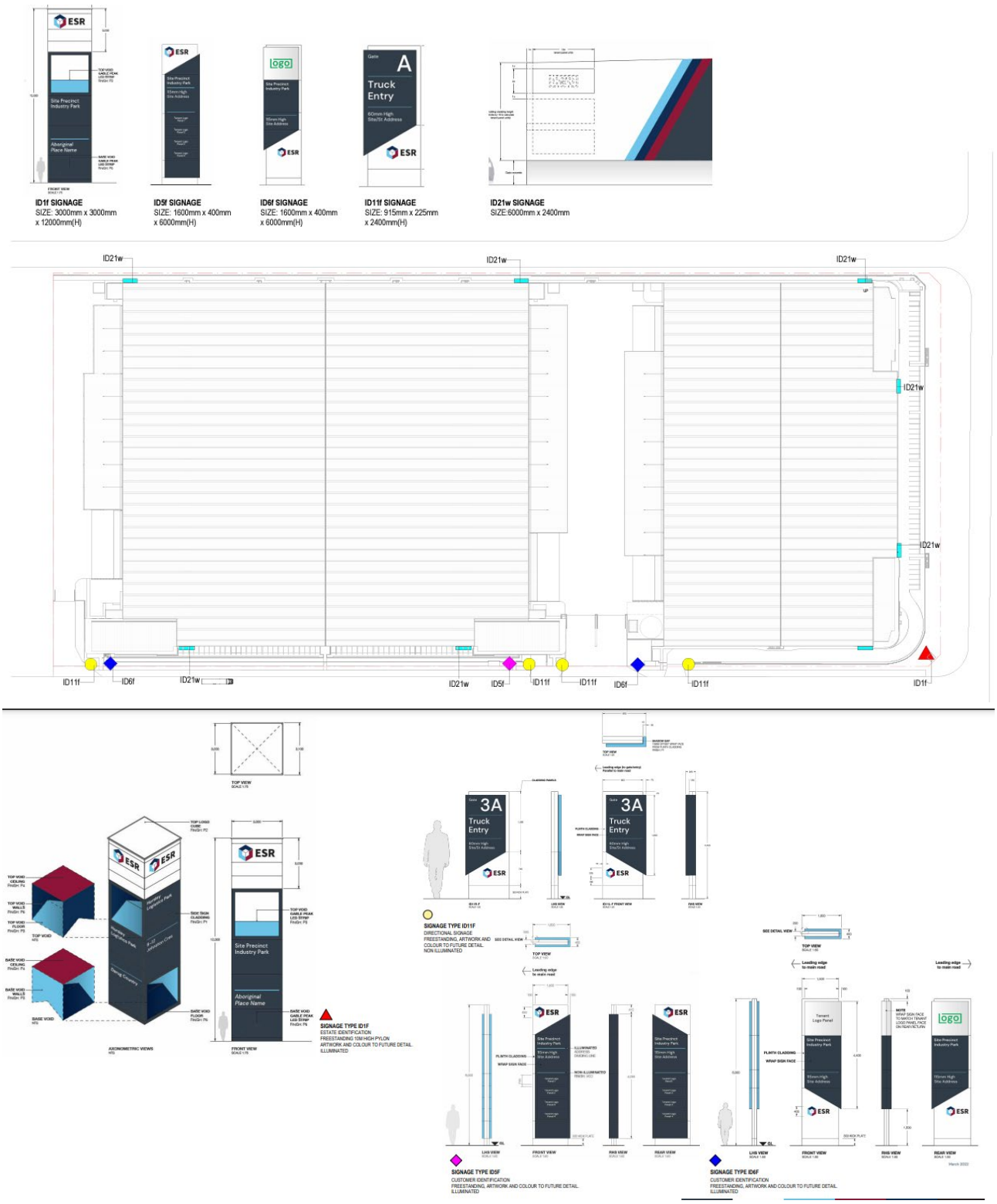
3.2.4. Signage

The proposed signage is detailed in the Architectural Plans, and the Signage Strategy Plan included at Figure 19. A total of 16 signs in four typologies are proposed at the site to address estate identification, tenant identification, and vehicular and pedestrian wayfinding. These signs include:

- 4 x directional signs are proposed and located along the eastern frontage to Johnston Crescent. These signs are not illuminated. The freestanding signs are positioned adjacent to the pedestrian and vehicular entryways to provide legibility of the site.
- 3 x customer identification signs are proposed along this eastern frontage to provide tenancy details for each warehouse. These signs are illuminated.
- 1x singular 10 metre illuminated pylon sign is proposed for estate identification. This is located at the north eastern corner of the property, at the intersection of Burley Road and Johnston Crescent.
- 8 x tenant logo panels are proposed to be erected on the building façades.

The type of signage proposed aligns with the Stage 1 signage which has been approved and consistent with the broader estate.

Figure 19 Signage Strategy Plan



Source: Nettleton Tribe

3.2.5. Transport and Parking

3.2.5.1. Access

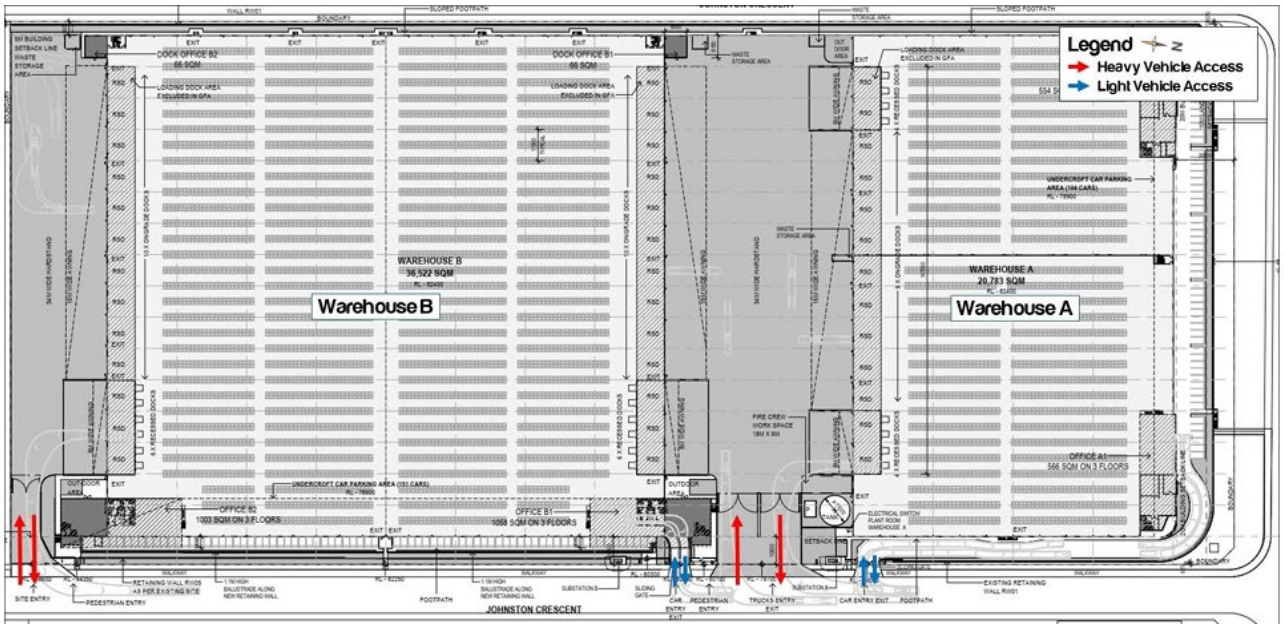
The proposed development proposes four vehicular accessways via Johnston Crescent (at the eastern site boundary) as demonstrated in **Figure 20**, comprising:

- Heavy vehicle crossover:

- A centrally located separated entry and exit driveway to the central shared hardstand area between both warehouses.
- A combined entry and exit driveway to Warehouse B hardstand area, located to the south of the building.

- Light vehicles:
  - Two combined entry and exit driveways to both sides of the central heavy vehicle crossover. A separate driveway crossover provides access to each of the Warehouse A undercroft carpark area located along the northern boundary and the Warehouse B undercroft carpark area along the eastern boundary.

Figure 20 Vehicular Access Arrangement



Source: AsonGroup

3.2.5.2. Parking

The proposed development provides 254 car spaces for light vehicle parking. This is split between two undercroft parking areas at Warehouse A and Warehouse B, as follows:

- Warehouse A: Provision of 104 parking spaces along the northern boundary.
- Warehouse B: Provision of 150 parking spaces along the eastern boundary.

3.2.6. Stormwater Management

Attenuation of stormwater runoff from the whole of the development is proposed to be managed through several On-site Detention systems. The sizing of the detention systems is noted to account for the road catchments remaining un-attenuated such that the total post-development runoff from the whole of the CSR estate is less than or equal to pre-development runoff as required of the DCP. Four stormwater management tank and four discharge points are shown on the civil plan.

To maintain stormwater quality, the following treatment system will be implemented for the warehouses:

- Proposed developed lot will require on-lot treatment measures which meet the load-based percentage requirements.
- On-lot systems will comprise proprietary filters in combination with pit inserts.
- A portion of the building roofs will also provide a level of treatment via rainwater reuse and settlement within rainwater tank.

Rainwater harvesting is proposed as part of the proposal. Roof rainwater is to be collected in designated rainwater tanks for use as non-potable water in toilets or landscape irrigation. A 70KL rainwater tank is

proposed along the eastern boundary, setback from the boundary and located behind the landscaping. Final configuration and sizing of the rainwater tanks is subject to detail design considerations and optimum site utilisation.

Details of the stormwater and rainwater tank details are contained within the Civil Plans attached at **Appendix CC.**

3.2.7. Uses and Activities

The Proposal seeks consent for the purposes of 'warehousing and distribution' including ancillary office space with operations 24 hours a day, seven days a week.

It is expected that 508 staff will work at the site once the entire estate is constructed and operational.

It is noted that no specific tenants have been assigned to the Site, and as such the specific operational details are not yet known. Notwithstanding, the technical assessments have been based off the existing tenant profile of ESR customers.

3.2.8. Development Timing

The project is proposed to be carried out in a single construction and operation stage. Construction is estimated to take 15 months, with a completion target date of March 2026.

4. Statutory Context

This section of the report provides an overview of the key statutory requirements relevant to the site and the project, including:

- *Biodiversity Conservation Act 2016* (**BCA Act**)
- *Environmental Planning and Assessment Act 1979* (**EP&A Act**)
- *Environmental Planning Assessment Regulation 2021* (**the Regulations**)
- *State Environmental Planning Policy (Planning Systems) 2021* (**Planning Systems SEPP**)
- *State Environmental Planning Policy (Resilience and Hazards) 2021* (**R&H SEPP**)
- *State Environmental Planning Policy (Transport and Infrastructure) 2021* (**T&I SEPP**)
- *State Environmental Planning Policy (Industry and Employment) 2021* (**I&E SEPP**)
- *State Environmental Planning Policy (Sustainable Buildings) 2022 (**Sustainable Buildings SEPP**)*
- *Fairfield Development Control Plan*
- *Western Sydney Employment Area – Fairfield Development Control Plan 2016*

It identifies the key statutory matters which are addressed in detail within the EIS, including the power to grant consent, permissibility, other approvals, pre-conditions and mandatory considerations.

4.1. Statutory Requirements

Table 7 categorises and summarises the relevant requirements in accordance with the DPE *State Significant Development Guidelines*. A detailed statutory compliance table for the project is provided at **Appendix C**.

Table 7 Identification of Statutory Requirements for the Project

STATUTORY RELEVANCE	ACTION
Power to grant approval	In accordance with Schedule 1 of the Planning Systems SEPP, development that has an estimated development cost of more than $50 million for the purpose of a Warehouse or Distribution Centre are classified as SSD: ***12 Warehouses or Distribution Centres*** *1. Development that has an estimated development cost of more than the relevant amount for the purpose of warehouses or distribution centres (including container storage facilities) at one location and related to the same operation.* *2. This section does not apply to development for the purposes of warehouses or distribution centres to which section 18 or 19 applies.* *3. In this section—* *relevant amount means—* *a. for development in relation to which the relevant environmental assessment requirements are notified under the Act on or before 31 May 2023—$30 million, or* *b. for any other development—$50 million* The proposed Warehouse B has an estimated development cost of $61,589,268 (refer to Appendix F) and therefore exceeds the cost threshold for State

	Significant Development. The combined estimated development cost for the overall development is $96,686,000. It is considered that Warehouse A is sufficiently related to Warehouse B to enable it to also be declared SSD as part of the same application. Both warehouse buildings will be located on the same lot owned by ESR and will have the same use. Both warehouse buildings will utilise the same singular vehicle access off Johnston Crescent and the central hardstand area, preventing the subdivision of the land to split the two buildings into separate ownership in the future. This approach is similar to that which enabled the progression of the Horsley Logistics Park Stage 1 (to the south of the site, on lots 201, 202, 203 and 204), however it is noted that in this case, both buildings are located on a single land title rather than on separate lots as was the case for HLP Stage 1. Therefore, Warehouse A is sufficiently related to Warehouse B to enable both buildings to be assessed under the same SSDA.
Permissibility	The site is zoned E4 General Industrial in accordance with Chapter 2 Western Sydney Employment Area of the Industry and Employment SEPP. The proposed development constitutes a '**Warehouse or Distribution Centre**' which is defined as the following: *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*. Accordingly, the proposed warehouse and distribution land use is permitted with consent in the E4 Zone. Figure 21 Zoning Map 

4.2. Pre-Conditions

Table 8 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 8 Pre-Conditions

STATUTORY REFERENCE	PRE-CONDITION	RELEVANCE	SECTION IN EIS
State Environmental Planning Policy (Resilience and Hazards) 2021	A consent authority must be 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.	No structures or buildings are currently occupying the site. Remediation works for the subject site have been completed by the previous owner CSR under the local DA. A Site Validation Report dated 28 April 2023 was prepared by ERM and confirmed that the subject site has been made suitable for the proposed commercial/industrial land use.	**Section 6.2.8**
State Environmental Planning Policy (Transport and Infrastructure) 2021	Section 2.122: Traffic generating development: A public authority, or person acting on behalf of a public authority, must not approve traffic-generating development without written notice of the intention to carry out the development to Transport for NSW (TfNSW) in relation to the development, and taken into consideration any response to the notice that is received from TfNSW within 21 days after the notice is given. The consent authority must refer development for Warehouse and Distribution centres with a site area / GFA greater than 20,000sqm with access to any road to Transport for NSW.	The site meets the warehouse GFA threshold as traffic generating development and will need to be referred to TfNSW.	**Section 6.1.4**
State Environmental Planning Policy (Industry and Employment) 2021	Chapter 2 Western Sydney Employment Area (WSEA) applies to the subject site. This chapter aims to protect	The site is located within the WSEA Precinct 8 South of Sydney Catchment Authority Warragamba Pipelines.	**Appendix C**

	and enhance the subject land for employment purposes.	Land zoning is prescribed under this Chapter, as well as other additional controls to guide development, which will be assessed in **Appendix C**.

4.3. Mandatory Considerations

Table 9 outlines the relevant mandatory considerations to exercising the power to grant approval and the section where these matters are addressed within the EIS.

Table 9 Mandatory Consideration

STATUTORY REFERENCE	MANDATORY CONSIDERATION	SECTION IN EIS
Section 1.3	Relevant objects of the EP&A Act	**Appendix C**
Section 4.15	In determining a development application, a consent authority is to take into consideration such matters that are of relevance to the development subject of the development application, as stipulated in section 4.15. These include: ▪ Relevant environmental planning instruments. ▪ Relevant draft environmental planning instruments. ▪ Relevant planning agreement or draft planning agreement. ▪ Development control plans. ▪ The likely impacts of that development, including environmental impacts on both the natural and built environments and social and economic impacts in the locality. ▪ The suitability of the site for the development. ▪ The public interest	**Section 7**
Section 4.38	Section 4.38 contains the provisions for determining State significant development.	**Section 4.1** and **Appendix C**
Mandatory relevant considerations under EPIs		
Resilience and Hazards SEPP	Section 4.6 – Contamination and remediation to be considered in determining a development application.	**Section 6.2.8** and **Appendix V**
Transport and Infrastructure SEPP	Section 2.122 – Traffic-generating development	**Section 6.1.4** and **Appendix K**

Industry and Employment SEPP	Chapter 2 Western Sydney Employment Area Chapter 3 Signage	**Appendix C**
Sustainable Buildings SEPP	▪ Section 3.2 – Development consent for non-residential development ▪ Section 3.3 – Other considerations for large commercial development (as the proposal comprises ancillary office area of more than 1,000sqm)	**Appendix C**
Considerations under other legislation		
Biodiversity Conservation Act 2016 (BC Act)	Due the existing ground conditions and extensive clearing of the site under previous development applications, a waiver has been sought from the requirement to prepare a BDAR.	**Appendix Q**
Development Control Plans		
Western Sydney Employment Area – Fairfield Development Control Plan 2016	Clause 2.10 of the Planning Systems SEPP states that development control plans (whether made before or after the commencement of this Policy) do not apply to SSD. Notwithstanding, the *Western Sydney Employment Area – Fairfield Development Control Plan 2016 (WSEA Fairfield DCP 2013)* is a site specific DCP applicable to the wider Horsley Park Precinct, including the subject site. Key built form controls have been considered and assessed in **Appendix C**.	**Appendix C**
Contributions		

The Fairfield Local Infrastructure Contribution Plan 2023 (s.7.12) applies to the land and proposed development. This contributions scheme requires the payment of a contribution to Council equivalent to 1% of the overall development cost, for the purposes of providing various public facilities within the Local Government Area.

Housing and Productivity Contribution applies to the site and the proposed development. For industrial development within the Greater Sydney Region (which the site is located at) contribution rate of $15 per square metre of new gross floor area applies (Rates will be indexed quarterly using ABS PPI index and the value calculated at the time of issuance of CC).

5. Community Engagement

The following sections of the report describe the engagement activities that have been undertaken during the preparation of the EIS and the community engagement which will be carried out if the project is approved.

5.1. Engagement Carried out

Community engagement

Community and stakeholder engagement has been undertaken by the Project Team in the preparation of the SSDA. This included direct engagement and consultation with:

- Landowners located in Horsley Park, including landowners from Burley Road, Delware Road, Greenway Place, Aldington Road and Johnston Crescent.

Methods of Engagement

A two-part engagement strategy was undertaken to consult with landowners surrounding the proposed development. The aim was to ensure relevant material was provided to the landowners prior to the submission of the SSDA.

- **Fact Sheet**: A fact sheet was prepared to outline the key features of the proposal and invite members of the community to provide feedback. The fact sheet advertised details of a dedicated email and phone number managed by ESR. The fact sheet was mailed to landowners on 24 June 2024 via Australia Post.
- **Door Knock and Letterbox Drop**: ESR physically distributed the fact sheet on 27 June 2024.
- **Engagement Email and Phone Line:** Members of the public were invited to contact the ESR team through a dedicated 1800 phone number and/or an email address between 24 June and 16 July 2024. The 1800 phone number and email address will remain live during the life of the project.

Government Agency Engagement

Consultation was also undertaken with the certain public authorities/stakeholders to inform the detailed assessment of key matters including:

- DPHI
- Heritage NSW of Department of Climate Change, Energy, the Environment and Water (DCCEEW)
- Transport for NSW (TfNSW)
- Fairfield Council
- Sydney Water
- Endeavour Energy

Methods of Engagement

Engagement with government agencies were carried out via email, phone and virtual meeting.

This engagement was consistent with the community participation objectives in the Undertaking Engagement Guidelines for State Significant Projects and complied with the community engagement requirements in the SEARs.

5.1.1. Community Views

At the time of writing this report no feedback has been submitted through the ESR enquiry line or email address and no mention of the project was detected on social media. No inquiry was received in relation to the fact sheet and letterbox drop.

5.1.2. Government Stakeholder Consultation

Table 10 Government agency feedback

Agency	Date	Comments/Feedback
DPHI	28 March 2024	A pre scoping meeting was held with DPHI to discuss the preliminary proposal and the requirement for a site-specific SEARs request for the project. Given the site's development history and the significantly disturbed site, it was discussed whether a full Aboriginal Cultural Heritage Assessment Report (ACHAR) would be required for this proposal. Further consultation with Heritage NSW and DPHI confirmed that due to previous site disturbance, the Department will accept a compressed ACHAR for the project, which includes: ▪ Completion of Stage 1 (i.e., Notification of project proposal and registration of interest) of the Community Consultation Process as per the guidelines. ▪ Completion of Stage 2 to 4 of Consultation Process (i.e., Stage 2 Presentation of information about the proposed project, Stage 3 – Gathering information about cultural significance and Stage 4 Review of draft ACHAR) as a combined process.
Fairfield Council	26 June 2024	A Pre-DA meeting was held with Fairfield Council to provide an introduction to the project and give Council the opportunity to provide early comment. The intent of the meeting was to provide an initial overview of the project and highlight any keys risks or challenges presented by the site. Outcome of council's consultation is summarised below: ▪ Council has no additional matters that needs to be addressed to what is already in the SEARs. ▪ In relation to B double access along Johnson Cresent, consideration should be given to potential vehicle conflict with the adjacent data centre (when information becomes available), and swept path analysis is required to assess vehicle movement (exiting and entering) of both sites. ▪ An Operational traffic management plan maybe required for the site ▪ In relation to the proposed light vehicle access, council's traffic officer is satisfied with the safety distance and line of sight from truck access. ▪ Council request landscape to comply with Council's requirements. Dense planting is encouraged in the area. Council was encouraged that the proposal incorporated landscape to soften the blank façade of the retaining wall. ▪ Fill material onsite needs to be verified. ▪ In relation to ACHAR, Council understand that the site is substantially disturbed, and the site is not identified in Council's policy as an investigation area. Therefore, ACHAR is not required from Council's perspective. ▪ Council noted that the site is not flood affected ▪ The proposal should ensure that turning the existing basin into hardstand area is not going to impact on detention storage or OSD requirement. ▪ When Council receive request to comment on EIS from DPHI, Council will respond within the agreed timeframe. Council will contact ESR directly if there is major issue. ▪ Applicant confirmed that there is no confirmed tenant for the site and the development will not be staged.
Heritage NSW	June and July 2024	The industry specific SEARs issued for this project requires preparation of AHCAR assessment. The Cover Letter (dated 29 May 2024) accompanying the SEARs and issued by DPHI, stated that 'preliminary and/or alternative assessment in relation to cultural heritage may be considered, if sufficiently justified by a suitably qualified person and to the satisfaction of Heritage NSW, who should be consulted as part of the required engagement when preparing the EIS.' Urbis Heritage met with Heritage NSW in June 2024 to discuss the Aboriginal cultural heritage assessment requirements. A subsequent letter was prepared by Urbis Heritage and issued to Heritage NSW, which provided more details on site history, ground disturbance and supporting plans/photograph that documented the site conditions and the level of impact. Heritage NSW confirmed in an email dated 17 July 2024, that given that the lands have undergone significant land use impacts, noting that all original soils have

Agency	Date	Comments/Feedback
		been removed, a compressed ACHAR can be undertaken for the project, which includes: ▪ Completion of Stage 1 (i.e., Notification of project proposal and registration of interest) of the Community Consultation Process as per the guidelines. ▪ Completion of Stage 2 to 4 of Consultation Process (i.e., Stage 2 Presentation of information about the proposed project, Stage 3 – Gathering information about cultural significance and Stage 4 Review of draft ACHAR) as a combined process. The compressed ACHAR is attached at Appendix CC.
Endeavour Energy	12 March 2024	Edgewater discussed power requirements with Endeavour Energy. No issues identified with providing the required supply
Transport for NSW	25 March 2024	Meeting held on 25 March 2024 between ESR and TfNSW to discuss forecast assumptions on network augmentation. TfNSW advised reliance on road upgrade contingent on Housing and Productivity Outcomes and structured Works-in-Kind framework, which DPHI is currently drafting. No foreseeable upgrades in the short term (0-5 years) led by government.
Sydney Water	16 July 2024	Sydney Water requested a feasibility application to be submitted by a Water servicing coordinator. Request is currently underway. No outcomes known at this stage.

The EIS and supporting documentation will be placed on public exhibition, providing stakeholders with an additional opportunity to review the Project, including the final development plans and the detailed specialist studies and assessment reports accompanying the final EIS.

6. Assessment of Impacts

This section describes the way in which the key issues identified in the SEARs have been assessed. It provides a comprehensive description of the specialist technical studies undertaken regarding the potential impacts of the proposed development and recommended mitigation, minimisation and management measures to avoid unacceptable impacts. Further detailed information is appended to the EIS, including:

- SEARs compliance table identifying where the SEARs have been addressed in the EIS (**Appendix A**).
- Statutory compliance table identifying where the relevant statutory requirements have been addressed (**Appendix C**).
- Community engagement table identifying where the issues raised by the community during engagement have been addressed (**Section 5**).
- Proposed mitigation measures for the project which are additional to the measures built into the physical layout and design of the project (**Appendix D**).

The detailed technical reports and plans prepared by specialists and appended to the EIS are individually referenced within the following sections.

6.1. Detailed Assessment Impacts

6.1.1. Design Quality

A Design Report has been prepared by Nettleton Tribe to demonstrate how the proposed development will achieve high design quality in accordance with the applicable guidelines.

The proposed warehouse has been assessed in accordance with the seven objectives for good design in the Better Placed Policy. The Better Placed policy aims to establish priorities and objectives that shape design to create well-designed built environments.

The proposed development is consistent with the Better Placed objectives as summarised in the Table below.

Table 11 Better Placed Design Objectives

OBJECTIVE	DESIGN PROPOSAL
Better Fit	The proposed development aims to complement and strengthen the operational synergy of the broader industrial hub. The development is strategically positioned to unlock future opportunities to capitalise on the expanding industrial and business activities spurred by the development of the WSA and the Aerotropolis. The development aligns with the long-term vision of the industrial hub, reinforcing its role as a magnet for economic activity and contributing significantly to the regional economy. The proposal will deliver a dynamic environment that not only supports the existing industrial base but also cultivates new opportunities for industrial expansion and innovation.
Better Look and Feel	The architectural design of the building seeks to blend seamlessly with its surroundings while complementing the evolving and future character of the area. The design reflects a contemporary approach to urban development, emphasising sustainability, aesthetic appeal, and the creation of a flexible environment to support continued employment growth. The form and scale of the structure have been thoughtfully considered to optimise functionality, operational flow, and integration with the neighbouring uses. The selection of material and colour palette of the buildings also correlate with ESR Horsley Park Stage 1 development to create synergies across the estate. The strategic placement of Office buildings along the

	northern side of Johnston Crescent ensures not only visibility, but also recognises their significant role within the local road and landscape.
Better Working	The facility will contribute to the realisation of the strategic vision for the WSEA. This vision aims to create a robust economic ecosystem that supports diverse industries and enhances regional connectivity. The facility's presence will provide job opportunities across various skill levels and foster economic resilience by attracting businesses that rely on efficient logistics and distribution capabilities.
Better for Community	The proposed development represents a significant opportunity to bolster employment within the community, benefiting both current residents and future generations. Located on the periphery of the Fairfield LGA and in close proximity to the Western Sydney Aerotropolis, this development is strategically positioned to serve as a cornerstone of the region's economic growth.
Better Value	The design has effectively addressed multiple needs by offering a diverse range of uses, ensuring close proximity to essential amenities, and maximising both internal and external amenities for its users. The thoughtful design approach has resulted in a space that accommodates various functions seamlessly. It caters to the immediate needs of its employees and also enhances their overall experience by providing convenient access to nearby amenities to contribute to a more efficient and pleasant working environment.
Better Performance	By leveraging the site's strengths and addressing its constraints proactively, the proposal delivers an outcome that supports the efficient development of the broader ESR estate and also enhances its overall functionality. This strategic alignment ensures that the proposed warehouses contribute effectively to the area's economic vitality and operational efficiency. The proposal represents a carefully considered option among various alternatives, prioritising factors such as sustainability, operational efficiency, and minimal environmental impact. The chosen design is also reflective of the market’s sizing and configuration requirements.
Better for People	The proposed warehouse and distribution facility is poised to significantly enhance employment opportunities for both current residents and future generations. The delivery of employment lands in a compatible area earmarked for employment generation, the development will support and amplify the strategic vision of the WSEA. The facility is expected to generate a range of job opportunities spanning various skill levels, thereby contributing to economic resilience and vitality. In addition, the proposal will provide high quality staff amenity, such as outdoor staff areas to support those onsite.

By adopting the objectives of the Better Placed policy, the development responds to the key challenges and directions for the proposal.

6.1.2. Built Form and Urban Design

A Design Report has been prepared by Nettleton Tribe to demonstrate how the proposed development responds to built form and urban design considerations. The report includes a site analysis which highlights how the design iteration evolved from a review of the site opportunities and constraints to appropriately respond to the site context. From this, the report demonstrates how the final design delivers a high quality, modern development that incorporates architectural features integrating function and aesthetics.

6.1.2.1. Existing Environment

The site is located within a General Industrial land context. The surrounding area is characterised by industrial land uses both existing and proposed to be constructed. The site has three frontages and is currently cleared with no vegetation or potential habitat.

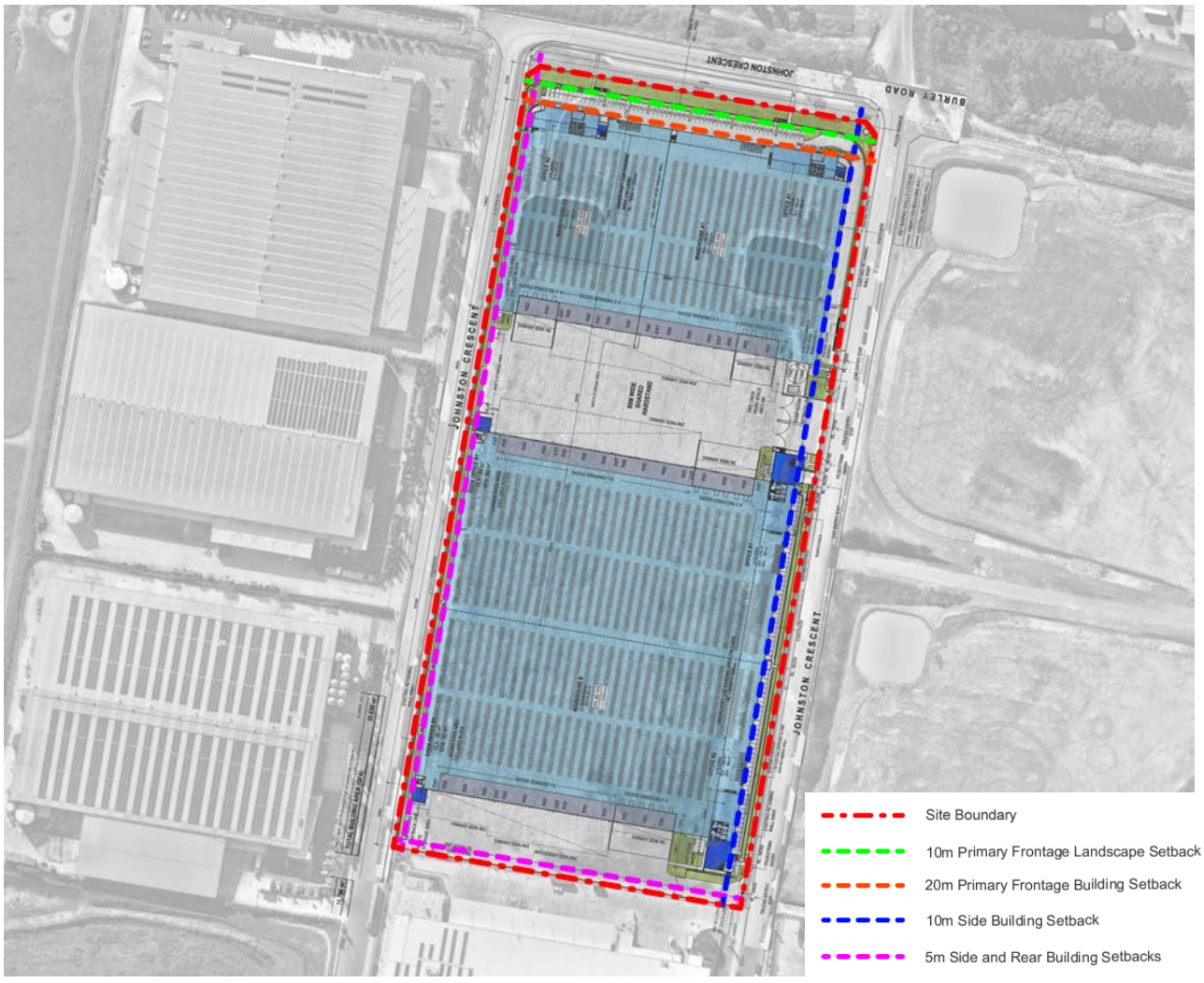
6.1.2.2. Proposed Development

The planning of the site and design of the building envelopes respond to the broader Horsley Park Precinct context, including addressing the relevant built form controls within the Fairfield DCP.

The design incorporates building and landscape setbacks to minimise visual impact and ensure the building and site layout is appropriately designed to address the three street setbacks. Along the northern frontage, the building is setback 20m with 9.88m landscape setback (DCP requires 10m). The slight shortfall of landscape setback is due to the provision of an existing retaining wall and a vehicle barrier at the kerb line. The overall objective of the landscape setback is achieved despite the very minor shortfall. Along the western frontage, the building is setback approx. 5m with a 3.8m landscaped setback. This complies with the DCP requirements. Along the eastern frontage, the building is setback 10m, with minor areas of the office encroaching into the setback area. Landscaping setback ranges between approx. 6m to 3.45m. The landscape setback is able to screen the parking areas and portion of the office from the street. To the south, the building is setback 34.94m from the rear common boundary to provide sufficient physical separation from the ESR Stage 1 development.

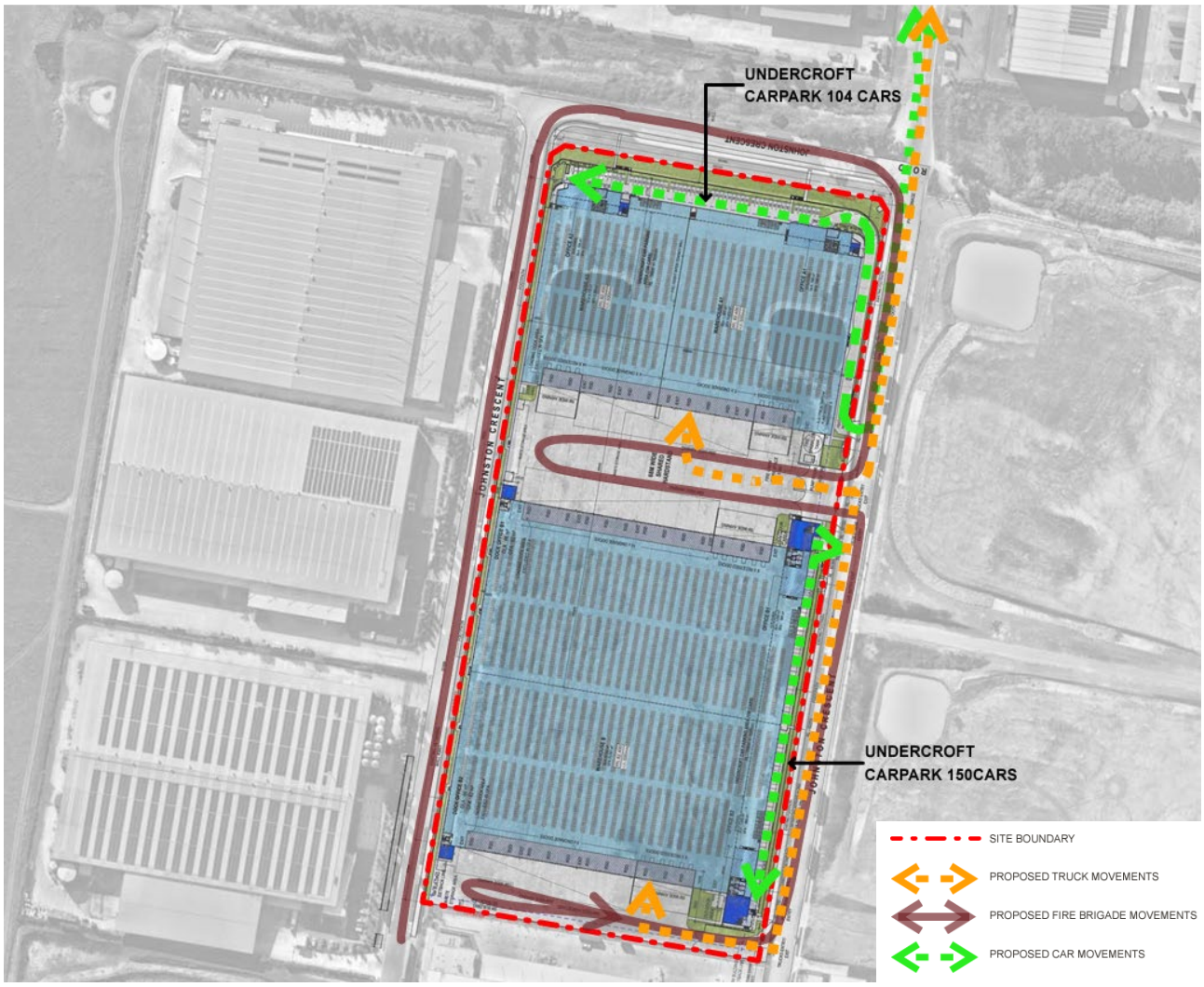
Figure 22 demonstrates the proposed building and landscape setbacks which are proposed to generally align with the DCP requirements.

Figure 22 Proposed Setbacks



Source: Nettleton Tribe

Another important design consideration was the traffic management and circulation. The site addresses three frontages and therefore creating a safe and efficient circulation within and around the site was critical. Vehicular access is planned from Johnston Crescent from the eastern boundary. An assessment of proposed access arrangements, including internal circulation and swept path analysis, has also been conducted to ensure optimal functionality and safety.

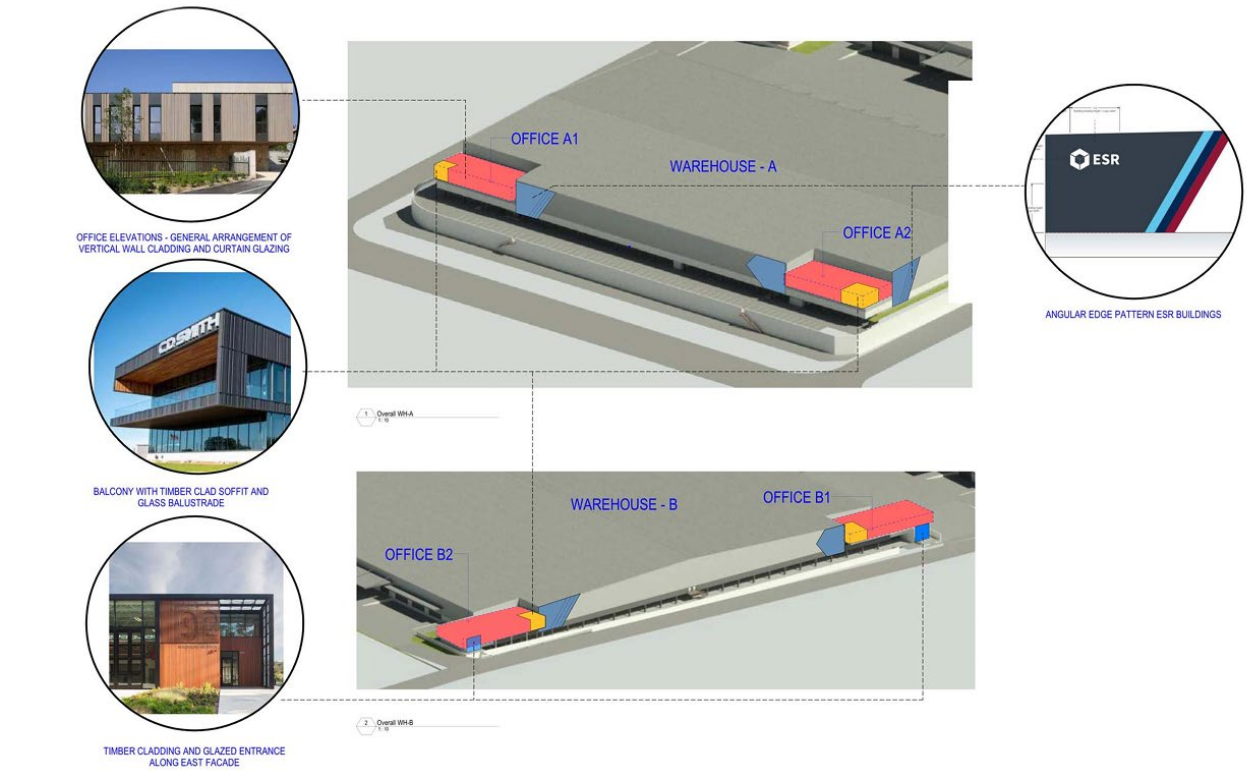


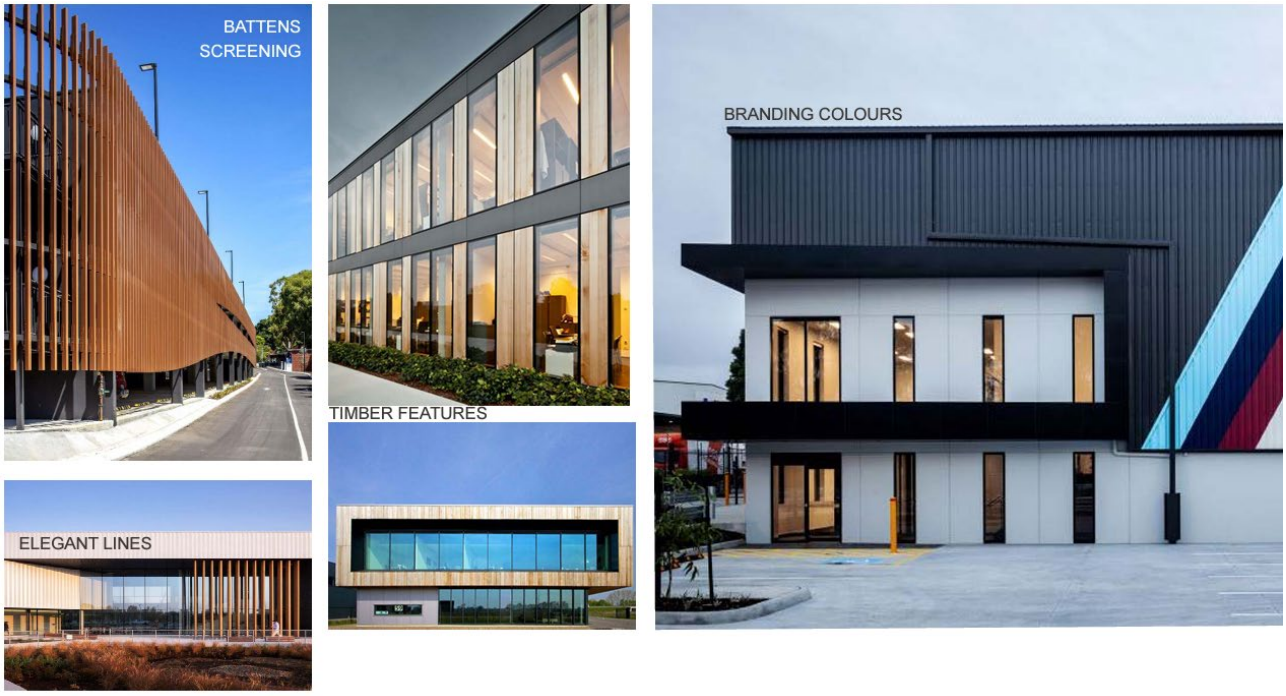
Source: Nettleton Tribe

The proposed height, bulk and scale is designed to deliver a high quality warehouse that is cohesive with the existing and future character of Horsely Logistics Park. The height and scale of the proposal is consistent with the surrounding existing and approved industrial development, therefore the proposal will not be seen as out of character within the Horsley Park industrial area.

The proposed design has been carefully developed to align with the expected aesthetic standards of industrial use while minimising its visual impact on the surrounding environment. The façade employs a geometric pattern to breakup the elevations and add visual appeal by reducing its perceived bulk. As demonstrated in Figure 23, the office components are strategically placed to define the building corners along Johnston Crescent and diversify the architectural composition by introducing textural contrasts to the materiality. The selection of material and colour palette of the buildings also correlate with ESR Horsley Park Stage 1 development to create synergies across the wider estate.

Figure 23 Facade Diagrams





Source: Nettleton Tribe

6.1.3. Visual Impact

A Visual Impact Assessment has been prepared by Geoscapes to assess the potential visual impacts to the surrounding locality. The proposal has been assessed against the existing site conditions employing photomontages to determine the extent of the development and its ability to maintain visual amenity.

6.1.3.1. Existing Environment

The site is surrounded by the following land uses:

- Land to the north of the site is the Oakdale East Industrial Estate (which is still under construction, with future development planned to the north and east) and Oakdale Central Industrial Estate (which has been completed). The existing developments are largely medium-large format warehouse and distribution centres, industrial and manufacturing development.
- Land to the immediate east is currently cleared, with proposed works for a data centre via SSDA-63741210. To the south of the proposed data centre comprises vacant industrial zoned land as well as natural bushland zoned C2 Environmental Conservation which is required to be retained and managed. Further east is land zoned RU4 Primary Production Small Lots which are characterised by rural residential land use activities.
- Bounding the site to the south is the Horsley Logistics Park Stage 1 development approved and constructed under SSD-10436, comprising of multiple large warehouses. Further south of the site is the Jacfin Horsely Park land, which comprise future RU4 lands for future primary production small lots. No residential dwellings currently exist on site.
- Immediately west of the site comprises several warehouse development and vacant general industrial zoned land. Further west is Oakdale South and Oakdale West Estates which form part of the Western Sydney Employment Area (WSEA).

Figure 24 Site context

Source: Geoscapes

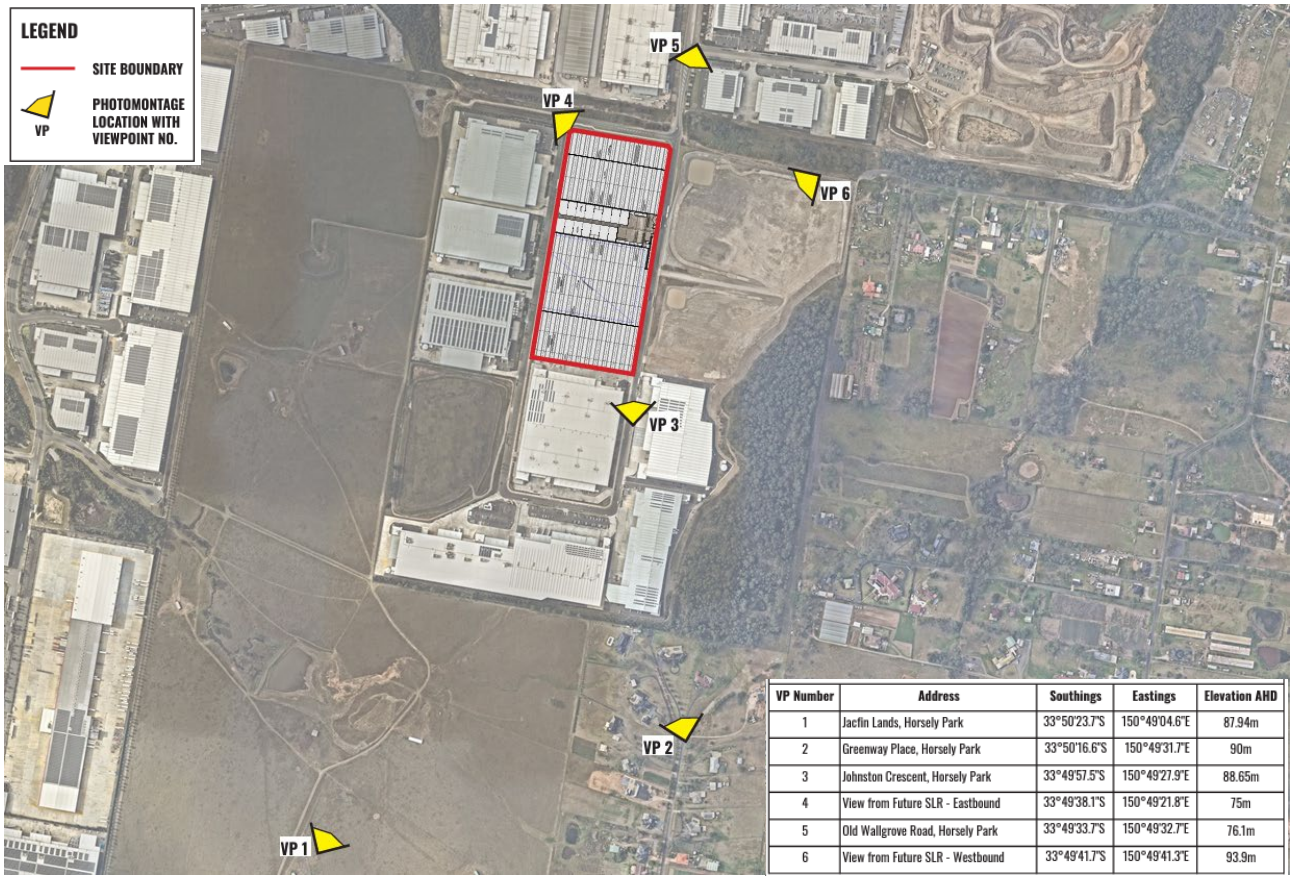
6.1.3.2. Potential Impacts

To assess the visual impact generated by the proposed development, six viewpoints were selected to complete the assessment and photomontages. These are listed below and highlighted in Figure 25.

- Jacfin Lands, Horsely Park (VP1)
- Greenway Place, Horsely Park (VP2)
- Johnston Cresent, Horsely Park (VP3)
- View from Future SLR Looking East (VP4)
- Old Wallgrove Road, Horsely Park (VP5)

- View from Future SLR Looking West (VP6)

Figure 25 Viewpoint Locations



VP Number	Address	Southings	Eastings	Elevation AHD
1	Jacfin Lands, Horsely Park	33°50'23.7"S	150°49'04.6"E	87.94m
2	Greenway Place, Horsely Park	33°50'16.6"S	150°49'31.7"E	90m
3	Johnston Crescent, Horsely Park	33°49'57.5"S	150°49'27.9"E	88.65m
4	View from Future SLR - Eastbound	33°49'38.1"S	150°49'21.8"E	75m
5	Old Wallgrove Road, Horsely Park	33°49'33.7"S	150°49'32.7"E	76.1m
6	View from Future SLR - Westbound	33°49'41.7"S	150°49'41.3"E	93.9m

Source: Geoscapes

The viewpoints which have been assessed are detailed below alongside their visual impact photomontages. Analysis has compared the existing view with day 1 of operation and 15 years post development.

In summary, the visual impacts generated are assessed and summarised in the following table.

Table 12 Proposed Visual Impacts

LEVEL OF IMPACT	VIEWPOINT LOCATION
Minor	Old Wallgrove Road, Horsely Park - Looking South (VP5)
	View from Future SLR - Westbound - Looking Southwest (VP6)
Minor Negligible	Johnston Crescent, Horsely Park - Looking North (VP3)
	View from Future SLR - Eastbound - Looking Southeast (VP4)
No impact	Jacfin Lands,Horsley Park - Looking North (VP1)
	Greenway Place, Horsley Park - Looking Northwest (VP2)

Viewpoints where the building was assessed as having a minor impact (viewpoint 5 and 6) are further discussed below.

Viewpoint 5 – Old Wallgrove Road

Viewpoint 5 was taken from a public footpath on the eastern side of Wallgrove Road adjacent to the recently constructed Goodman Oakdale East Industrial Estate. Refer **Figure 26** which contains the Photomontages prepared for the visual impact assessment.

The visual receptor sensitivity is judged to be low, as this view is likely to be viewed by motorists and the surrounding character is predominantly existing and new industrial development. Therefore, views of the surrounding area are unlikely to be of high importance.

The magnitude of change is determined to be low as the bulk and scale of the development is in keeping with the character of the wider estate.

Figure 26 Viewpoint 5 Visual Impacts Photomontage

Picture 11 Existing Site

Picture 12 Proposed Development – Year 0 Photomontage

Picture 13 Proposed Development – Year 15 Photomontage

Source: Geoscapes

Viewpoint 6 – View from Future SLR

Viewpoint 6 was taken from the southern side of the future Southern Link Road alignment, looking west. It was selected to indicate the type of views that would be experienced by future passing motorists on the westbound carriageway (refer to **Figure 27**).

The visual receptor sensitivity was assessed to be low as the views are likely to be experienced by motorists. These will be transient views experienced for a short time period.

The magnitude of change is judged to be low. This is because the proposed development will create a new development that has been anticipated in the area. The proposed landscaping will reduce the bulk and scale of the proposal.

In addition, a proposed data centre is located immediately east from the ESR proposal at 16 Johnston Crescent, Horsley Park (SSD-63741210). If the data centre is approved then this will affect how visible the ESR proposal will be when looking from the east. At Viewpoint 6, the Data Centre would result in the ESR development no longer being visible at this location. Motorists along the future Southern Link Road would still see the ESR development when traveling westbound however, this would only be possible when at a much closer distance.

Similarly, when viewed from the residential development at 321 and 315 Burley Road, the data centre built form will screen the proposed ESR development when viewed from these locations.

Figure 27 Viewpoint 6 Visual Impacts Photomontage

Picture 14 Existing Site

Picture 15 Proposed Development – Year 0 Photomontage

Picture 16 Proposed Development – Year 15 Photomontage

Source: Geoscapes

Overall, the assessment determines all six of the viewpoints assessed were considered to have no significant visual impacts. Visual receptors surrounding the site have low sensitivity and views of the surrounding landscape are not of primary importance.

The residential receptors located to the east of the broader estate already receive views of the existing industrial uses. Following the development at Lot 305 to the immediate east of the development site, these residential lots will not receive views of the proposed development. Additionally, locations to the south would receive no visual impacts from the proposal.

6.1.3.3. Mitigation measures

To help mitigate and soften the building particularly from visual receptors located in the north, northeast and northwest, the proposal should retain the proposed landscape setback. This should include indigenous and native canopy tree planting together with shrubs and groundcovers.

6.1.4. Traffic, Transport and Accessibility

A Transport and Accessibility Impact Assessment (TAIA) has been prepared by Ason Group to provide detailed assessment of the traffic and transport impacts associated with the proposed development on the surrounding road network, for both construction and operational phases.

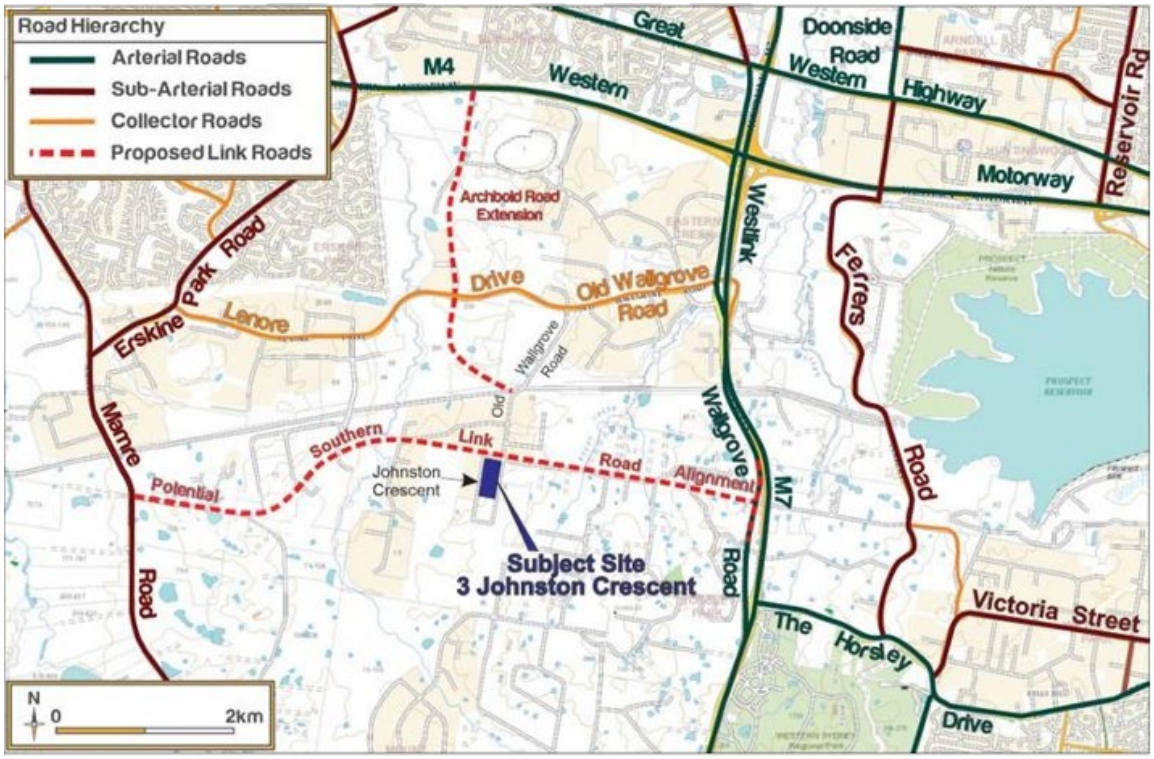
6.1.4.1. Existing Environment

The TAIA identifies the existing road network surrounding the site, including key roads and intersections which are outlined in the following Figure 28. The site is central to several arterial and sub-arterial roads. The proposed Southern Link Road is identified to run east west and parallel to the site's northern boundary.

In terms of public and active transport connectivity, the site has limited access. The site is not located in proximity to a train station, with the closest being Rooty Hill station approximately 11km from the site. In addition, the nearest 2 bus stops are located beyond 1.2 km from the site.

Johnston Crescent currently provides pedestrian paths in the subject site's vicinity. It is expected that Burley Road and other estate roads will provide pedestrian connection to facilitate a permeable and convenient walking opportunity to connect to the Old Wallgrove Road pedestrian network. There are currently limited cycling facilities and routes provided within the immediate proximity of the development.

Figure 28 Surrounding Road Network



Source: AsonGroup

6.1.4.2. Operational phase traffic and parking assessment

Parking

Car parking

Parking provision for the Proposal has been reviewed against Council's DCP and the RMS Guide to Traffic Generating Developments (TfNSW Guide). The DCP rates are more suitable to small developments and industrial business parks with high proportion of office areas. This specific proposal provides for large-format warehousing which generally requires significantly lower tenant parking requirements. This highlights that the DCP rates generally far exceed the anticipated parking demand. As such, the most appropriate car parking requirements, being those stipulated in most recent approved rates for other warehouse developments in the WSEA of 1 per 300m^2 and 1 per 40m^2 (in line with TfNSW Guides), have been adopted for the Proposal. The TAIA calculates 254 on-site parking spaces satisfies the provision requirements in accordance with the TfNSW Guide.

In addition, 4 accessible parking spaces are provided, which is consistent with the rate prescribed under the WESA DCP (*All developments providing 50 parking spaces or more must provide at least 2% or part thereof of those spaces for disabled drivers*) and is consistent with the rate employed in SSD-10436 for the neighbouring Lot 206 Horsley Park (Condition A8).

Bicycle and end of trip

The WSEA DCP does not provide bicycle parking or end of trip provision rates. Therefore, bicycle parking has been assessed having regard for the NSW Planning Guidelines for Walking and Cycling (Walking and Cycling Guidelines). The Walking and Cycling Guidelines requires the following for industrial developments:

- Staff bicycle parking requirement: 3-5% of staff number
- Visitor bicycle parking requirement: 5-10% of staff number

Additional locker, shower and change room requirements per the guidelines is summarised below:

- 50-149 staff: 1 per 3 racks for locker, 4 (2 male and 2 female) showers, and 2 (1 male and 1 female) change rooms.

The Proposal provides for the following which satisfies requirements of the Walking and Cycling Guidelines:

- Warehouse A
  - 12 bicycle spaces
  - 6 showers (2 male, 2 female and 2 accessible)
  - 2 change rooms (1 male and 1 female) and associated lockers
- Warehouse B
  - 12 bicycle spaces
  - 12 showers (4 male, 4 female and 4 accessible)
  - 2 change rooms (1 male and 1 female) and associated lockers

It is expected that any detailed construction drawings in relation to the bicycle parking and end of trip facilities would be provided in accordance with Australian Standard AS2890.3:2015.

Loading:

A review of large-format warehousing recently approved within the LGA in similar developments has been undertaken to determine service bay provision at the site. Actual demand for service bay provision is expected to fall within the range of 1 service bay per 691m2-2,325m2 of warehouse GFA.

The Proposal provides for 48 bays, equivalent to a provision of 1 space per 1,099sqm. Accordingly, the proposed service bay provision falls within the acceptable range for similar large-format warehouses approved in the area and is deemed to be supportable on these grounds.

In summary, the TAIA has assessed the parking provision for the site and confirms adequate parking will be provided to support the proposed development in accordance with the relevant requirements.

Design

The truck driveway has been designed to provide for vehicles up to and including a 26.0m B-doubles.

Swept path assessment has been prepared (refer **Appendix A** of the traffic report) to demonstrate suitable circulation within the site has been achieved.

Sight distance checks are included in **Appendix A** of the traffic report and is deemed to be acceptable. It should be considered that sight angles within these areas should not contain any permanent obstructions to impact visibility.

Reference is made to Fairfield DCP 3.7 Bushfire Management Control 9 which indicates perimeter access via the frontage road is to be provided for the Site.

As such, specialist fire service appliance circulation within each site has been tested for a 12.5m HRV and demonstrated in the swept path assessment. Per the swept paths, a 3-point turn manoeuvre is demonstrated which has been deemed acceptable per the Fire Consultant and in Fire and Rescue NSW (FRNSW) Fire Safety Guideline.

Overall, the design of the proposal is able to comply with relevant design requirements.

Traffic

Development in the broader WSEA includes approved traffic modelling and trip generation rates. The traffic assessment for the proposed development references these adopted rates to calculate trip generation for the site.

The approved traffic modelling undertaken for the broader WSEA adopts the following trip generation rate for ‘Lands south of Sydney Water Pipeline’ with which the Site lies within.

- 21 trips per hectare for two-hour peak period.

A conversion factor of 0.55 has been assumed to identify the equivalent one-hour peak volume from the two hour peak volume. As such, a one-hour peak hour generation of 11.6 trips per hectare of the site area is applied (equivalent to 0.116 trips / 100m2 of Site area). Based on a site area of 86,721sqm, an equivalent peak hour trip generation of 101 vehicles is conservatively estimated for the site. This means that the traffic modelling underpinning the WSEA has allowed a 101 vehicle trips (to/from) for this Site.

In addition, to further inform the anticipated trip generation rate, reference is also made to the nearby approved, constructed, and fully operational sites in the HLP. The comparison of these trip rates demonstrates a considerably lower trip rate for the HLP Stage 1, than that projected by the WSEA rates. As such, the HLP Stage 1 rates are considered more appropriate to adopt given the similar building typology and user mix.

The traffic assessment for the site was completed to compare the traffic generation rate of the proposal with the approved WSEA rates (refer Table 13**).** It highlights the development will not generate more than what was approved for its site area under WSEA modelling and therefore, it is reasonable to assume that the proposed development's traffic generation had readily been included in WSEA cumulative approved traffic modelling. The proposed development Rate and GFA is within its approved threshold within the WSEA.

Table 13 Trip rate Comparison

Trip Rate	**Trip**		**Trip Generation**	
	AM	**PM**	**AM**	**PM**
Approved WSEA (trip rate threshold)	0.116 trips / 100m2 of Site area	0.116 trips / 100m2 of Site area	101	101
Based on HLP Stage 1 Surveyed Rates	0.13 trips / 100m2 GFA	0.10 trips / 100m2 GFA	75	54
Higher trip rates	0.18 trips / 100m2 GFA	0.16 trips / 100m2 GFA	101	89

Cumulative SIDRA modelling for the proposed development and other recent approvals in the area has been undertaken based on publicly available information and considering the key routes providing vehicular access for the proposal. It is also important to note there are several key infrastructure road upgrade works envisaged by the NSW Government in the area which is likely to improve and change the traffic patterns in the area. These upgrades will, in time, improve the traffic pressure of key intersections impacted by this development i.e. Old Wallgrove Road / Lenore Drive and Old Wallgrove Road / Milner Avenue.

For conservativeness the following modelling scenarios were undertaken:

- Scenarios 1 to 3 assumes existing configuration of the signals without Oakdale East Industrial Estate (OEE) full development traffic with and without the proposal (by 2026 development opening year).
- Scenarios 4 to 6 assumes planned upgrades as part of SSD-37486043 MOD 1 plus OEE full development delivery with and without the proposal (conservatively assumed for 2026).
- Scenarios 7 to 9 assumes planned upgrades as part of SSD-37486043 MOD 1 plus OEE full development delivery with and without the proposal (assumed for 2036).

The following results were shown for each of the scenarios tested.

Table 14 SIDRA Results

SIDRA Results – 2026 Scenarios 1 to 3

Intersection	Peak	Scenario 1			Scenario 2			Scenario 3		
		DoS	Delay (s)	LoS	DoS	Delay (s)	LoS	DoS	Delay (s)	LoS
Old Wallgrove Road / Lenore Drive	**AM**	0.61	22	LOS B	0.60	23	LOS B	0.60	23	LOS B
	PM	0.61	30	LOS C	0.62	31	LOS C	0.64	32	LOS C
Old Wallgrove Road / Millner Avenue	**AM**	0.61	22	LOS B	0.46	30	LOS C	0.46	30	LOS C
	PM	0.46	38	LOS C	0.47	39	LOS C	0.49	40	LOS C

SIDRA Results – 2026 Scenarios 4 to 6

Intersection	Peak	Scenario 4			Scenario 5			Scenario 6		
		DoS	Delay (s)	LoS	DoS	Delay (s)	LoS	DoS	Delay (s)	LoS
Old Wallgrove Road / Lenore Drive	**AM**	0.74	25	LOS B	0.78	25	LOS B	0.79	26	LOS B
	PM	0.85	41	LOS C	0.88	42	LOS C	0.91	43	LOS C
Old Wallgrove Road / Millner Avenue	**AM**	0.53	24	LOS B	0.54	25	LOS B	0.54	26	LOS B
	PM	0.67	38	LOS C	0.67	39	LOS C	0.67	39	LOS C

SIDRA Results – 2036 Scenarios 7 to 9

Intersection	Peak	Scenario 7			Scenario 8			Scenario 9		
		DoS	Delay (s)	LoS	DoS	Delay (s)	LoS	DoS	Delay (s)	LoS
Old Wallgrove Road / Lenore Drive	**AM**	0.84	24	LOS B	0.84	24	LOS B	0.84	24	LOS B
	PM	0.91	42.5	LOS C	0.92	43.4	LOS D	0.96	45.4	LOS D
	AM	0.53	24	LOS B	0.54	25	LOS B	0.54	26	LOS B

Intersection	Peak	Scenario 7			Scenario 8			Scenario 9		
		DoS	Delay (s)	LoS	DoS	Delay (s)	LoS	DoS	Delay (s)	LoS
Old Wallgrove Road / Millner Avenue	**PM**	0.67	38	LOS C	0.67	39	LOS C	0.67	39	LOS C

For scenarios 1 to 3, it is noted if the planned upgrades outlined in SSD-37486043 MOD 1 are not delivered by 2026, the existing signalised intersections can accommodate the proposed development traffic generation.

For scenarios 4 to 6, the development traffic will not result in any material traffic impacts onto the surrounding key intersections. More importantly, the LoS will remain unchanged between approved SSD-37486043 MOD 1 traffic impact assessment with addition of the proposed development traffic.

For scenarios 7 to 9, the proposed development traffic is unlikely to have any material traffic impact onto the key intersections by 2036. The PM peak hour decreased LoS from C to D is still acceptable and is a result of an increase of less than 1 second delay (0.9 seconds) when adopting the surveyed trip rates.

It is noted that the 2036 modelling assessment does not include any of TfNSW's future road network upgrades including Archbold Road or SLR. These two state funded projects are likely to improve the performance of these intersections quite significantly.

All the results from each scenario demonstrate the proposed development traffic is unlikely to have any material traffic impact on the key intersections. This is noted for the 2026 and 2036 modelling results. Therefore, the Proposal is not anticipated to result in adverse impacts on the surrounding road network.

Overall, the anticipated Proposal traffic generation would not have a material impact on the surrounding road network.

6.1.4.3. Construction phase traffic and parking assessment

A Preliminary Construction Traffic Management Plan (PCTMP) has been prepared as part of the TAIA, which details preliminary construction traffic management measures.

The primary potential haulage route to and from the site would occur along Old Wallgrove Road, with trucks accessing the site from the M7 Motorway to the east or Lenore Drive and Mamre Road to the West.

Light vehicle traffic generation would be generally associated with contractor movements to and from the Site. The workforce arrival and departure periods (likely to be 6.00-7.00AM and 5.00-5.30PM) represent the peak construction traffic generation periods.

Light vehicle construction trips are expected to arrive in the morning and depart in the evening outside road network peak hours and the number of trips would be based on the workforce numbers. Parking for this construction related vehicles would be provided on-site.

Heavy vehicle traffic would mainly be generated by activities associated with the delivery of construction equipment and delivery of material for construction works. Majority of the deliveries are likely to occur outside of the peak road network traffic periods and would have limited (if any) impact onto surrounding road network traffic on Old Wallgrove Road, Lenore Drive, M7 Motorway and Mamre Road which currently have high proportions of heavy vehicles.

Construction traffic is not expected to exceed the operational traffic generation of the Proposal. However, as part of the Monitoring Program outlined Section 7.9 to be prepared as part of a detailed CTMP.

Measures will be implemented to ensure public roads and access points will not be obstructed by any materials, vehicles, refuse skips or the like, under any circumstances. For any works that will impact the

traffic flows on the external road network, a permit will need to be obtained from the relevant road authority (Council and / or TfNSW) by the Contractor.

6.1.4.4. Mitigation Measures

Construction

The following measures should be implemented:

- A detailed CTMP shall be prepared upon appointment of a Contractor where detailed construction traffic volumes and vehicles would be ascertained.
- As part of the Monitoring and Communications Strategies prepared as part of the CTMP, regular reviews will be undertaken by the on-site coordinator during implementation and execution of the CTMP.
- A Greet Travel Plan (GTP) shall be prepared and finalised prior to occupation, the GTP should address the overarching requirements of the preliminary GTP prepared by ASON and submitted as part of the EIS.
- Traffic control is required to manage and regulate traffic movements into and out of the Site during construction.
- Disruption to road users will be kept to a minimum by scheduling intensive delivery activities outside of peak network hours.
- Construction and delivery vehicles shall be restricted to using Old Wallgrove Road and M7 Motorway; and Lenore Drive and Mamre Road.

Operation

The following measures should be implemented:

- Due to the shared nature of the hardstand, a Loading Dock Management Plan (LDMP) and Operational Traffic Management Plan (OTMP) is required to ensure the efficient operation of the site. Measures will also be included to ensure loading, unloading or servicing can be accommodated on the site to avoid queuing in the street network. These plans shall be prepared prior to obtaining the Occupation Certificate (OC).
- Bicycle parking and end of trip facilities must be provided in accordance with the rate under the NSW Planning Guidelines for Walking and Cycling (Walking and Cycling.
- Driveway, ramp, onsite parking, accessible parking, bicycle parking and end of trip facilities shall be designed in accordance with relevant Australian Standards.

6.1.5. Air Quality

An Air Quality Impact Assessment was prepared by SLR Consulting to identify any potential air emissions sources at the proposed development and assess their potential to cause adverse impacts to the surrounds.

6.1.5.1. Existing Environment

The site and its immediate surrounds are zoned as industrial land. The closest sensitive receptors to the site are the industrial and commercial facilities located adjacent to its northern, southern and western boundaries. The closest residential receptors to the Site are the residences approximately 350m – 500m to its east and south.

Baseline air quality monitoring was reviewed to understand the existing site conditions. It employed nearby monitoring stations in proximity to the site. The assessment employed the monitored pollutant concentrations from the last five years. The data demonstrates exceedances for some pollutant concentrations. This was noted to be primarily due to exceptional events such as bushfires, dust storms or hazard reduction burning.

Figure 29 Receptor Locations

Source: SLR Consulting

6.1.5.2. Potential Impacts

Construction

An assessment of the construction stage of the proposal was undertaken. The main air quality issues associated with construction works relate to emissions of fugitive dust. This is directly related to the nature of activities occurring during this stage. These activities mostly relate to:

- Grading.
- Loading and unloading of materials.
- Wheel-generated dust and combustion emissions from construction equipment.
- Wheel-generated dust from trucks travelling on unpaved surfaces.
- Wind erosion of exposed surfaces

A number of environmental factors may affect the generation and dispersion of dust emissions, including:

- Wind direction - determines whether dust and suspended particles are transported in the direction of the sensitive receptors.
- Wind speed - determines the potential suspension and drift resistance of particles.
- Surface type - more erodible surface material types have an increased soil or dust erosion potential.
- Surface material moisture - increased surface material moisture reduces soil or dust erosion potential; and
- Rainfall or dew - rainfall or heavy dew that wets the surface of the soil reduces the risk of dust generation.

The risk to air quality impacts was assessed and detailed in the following figure. To begin the assessment, the sensitivity of the area was assessed in relation to dust soiling and health impacts. The surrounding industrial and commercial receptors are classified as having low sensitivity due the distance to the subject site. Following, the level of risk to dust soiling and human health effects was identified to be low during earthworks and construction phases and medium during trackout phase. Based on the above methodology, the overall air quality risk from the project construction activities is rated as medium for the surrounding receptors.

Based on the IAQM methodology, the assessment is normally required for a 'human receptor' within 250m of the site boundary. As the residential receptors are beyond this distance, they are not required to complete a detailed assessment.

Table 15 Preliminary Risk of Air Quality Impacts from Construction Activities (Uncontrolled)

		Dust Emission Magnitude			**Preliminary Risk with no mitigation**			
Impact	**Sensitivity of Area**	**Earthworks**	**Construction**	**Trackout**	**Earthworks**	**Construction**	**Trackout**	**Maximum**
Dust Soiling	Low	Medium	Large	Large	Low	Low	Medium	**Medium**
Human Health	Low				Low	Low	Medium	**Medium**

Operation

During the operational phase, the main source of air emissions would be emissions of products of fuel combustion and particulate matter (from brake and tyre wear as well as re-entrainment of road dust) associated with the trucks and other vehicles entering and leaving or idling at the site during loading/unloading operations. This relates to emissions associated with the combustion of fuel (diesel, petrol) in road vehicles, specifically including carbon monoxide (CO), oxides of nitrogen (NOx), particulate matter (PM10 and PM2.5), sulfur dioxide (SO2) and volatile organic compounds (VOCs).

The assessment calculated the contaminant concentrations at various distances from the road kerb. Given the low level of CO and SO_2 emissions from vehicles and the low ambient concentrations recorded in the region, it is reasonable to assume that CO and SO2 emissions from road traffic are unlikely to result in any exceedances of the relevant criteria at locations beyond the road kerb. Accordingly, CO, SO2 and VOC traffic emissions have not been considered further in the assessment.

Traffic movement details were provided by Ason to support the assessment. The findings convey pollutant concentrations up to 200m from the road's kerb. Further, the incremental predicted concentrations due to vehicles travelling along Johnston Crescent at the closest sensitive receptors are insignificant and none of the predicted concentrations would be expected to contribute significantly to the potential exceedances for the relevant criteria. The assessment concludes all cumulative concentrations comply with the relevant criteria.

In relation to cumulative impact, the SEARs require a detailed cumulative assessment where air emissions have been found to potentially cause adverse off-site impacts. The screening assessment found that the incremental impact associated with the operation of the project is expected to be negligible and as such a detailed cumulative assessment was not deemed to be required.

6.1.5.3. Mitigation Measures

Mitigation measures have been outlined to address the potential impacts from construction activities. By applying these measures it may reduce the risk of these impacts from medium to low for the surrounding receptors. The measures are listed below.

- Earthworks
  - Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable.
  - Use hessian, mulches or trackifiers where it is not possible to revegetate or cover with topsoil, as soon as practicable.
  - Only remove the cover in small areas during work and not all at once.
- Construction
  - Avoid scabbling (roughening of concrete surfaces) if possible.
  - Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.
  - Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery.
- Trackout
  - Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use.
  - Avoid dry sweeping of large areas.
  - Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.
  - Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.
  - Record all inspections of haul routes and any subsequent action in a site log book.
  - Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned.
  - Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).
  - Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits.
  - Access gates to be located at least 10 m from receptors where possible.

6.1.6. Noise and Vibration

SLR were engaged to prepare a Noise and Vibration Impact Assessment (**Appendix S**) to demonstrate how noise will be managed during the construction and operation of the site. The report makes recommendations where required, to reduce and manage the noise and vibration impact at the nearest potentially affected receivers.

6.1.6.1. Existing Environment

The nearest sensitive receivers to the site were identified for the assessment as shown in Figure 30. The nearest residential receivers are located around 350 m east of the site on Burley Road.

Figure 30 Sensitive receiver area

Source: SLR

The acoustic environment of the site was measured by the deployment of unattended noise monitoring conducted during May 2024.

The noise monitoring equipment continuously measured existing noise levels in 15-minute periods during the daytime, evening and night-time. The noise monitoring locations are also shown in Figure 30.

Noise monitoring data from location L03 was corrupted due to logger failure and could not be used. Short-term attended noise monitoring was also completed. The attended measurements allow the contributions of the various noise sources at each location to be determined.

6.1.6.2. Potential Impacts

Construction

Construction noise is assessed according to construction works. The following noise generating equipment during the proposed works will be undertaken between the following operating hours:

Table 16 Operating Hours of Noise Generating Equipment

Construction hours	Equipment
▪ 7:00 am to 6:00 pm, Mondays to Fridays ▪ 8:00 am to 1:00 pm on Saturdays ▪ At no time on Sundays or Public Holidays.	Excavator 10T, vacuum truck, concrete pump, concrete truck, bored piling, mobile crane, hand tools. *Due to the minor extent of earthworks, excavator is proposed to be used for the earthwork, there are no additional equipment proposed for earthworks.

The assessment involved calculations to predict maximum LAeq noise emission levels at adjacent receiver locations. Based on previous operator- attended surveys of similar activities and equipment, prediction calculations have been undertaken to predict the noise impact at adjacent receiver locations, resulting from the proposed works. Table 17 presents the maximum noise emissions against relevant criteria for the residential and commercial receivers. The table indicates that construction noise levels are predicted to comply with the relevant Noise Management Levels (NMLs) at all surrounding residential and commercial receivers.

The predictions represent a realistic worst-case scenario at the nearest location to each receiver where the equipment in each scenario is working concurrently. As in real terms all equipment is not likely to be operating concurrently, it is expected that noise levels would frequently be lower than the worst-case levels presented.

Table 17 Predicted Construction Noise Levels – Standard Daytime Construction Hours

NCA	Most-affected Receiver Location	Type	NML	Predicted Noise Level – LAeq(15minute) (dBA)			
				W.01	Construction of Pads, Hardstands & Ramps	W0.2	Construction of Structures
NCA02	49-53 Greenway Pl, Horsley Park NSW 2175	Residential	50	36		37	
NCA03	315-319 Burley Rd, Horsley Park NSW 2175	Residential	49	45		46	

NCA	Most-affected Receiver Location	Type	NML	Predicted Noise Level – LAeq(15minute) (dBA)			
				W.01	Construction of Pads, Hardstands & Ramps	W0.2	Construction of Structures
Commercial	2 Johnston Cr, Horsley Park NSW 2175	Commercial	70	64		65	

Source: SLR

There is potential for cumulative construction noise impacts from MOD1 works at Oakdale East Estate (SSD-37486043 MOD1) and Next DC S4 Data Centre Horsley Park (SSD-63741210) if it is constructed at the same time as the proposal. The construction schedule for those projects is currently unknown.

Since construction scenarios and equipment for Oakdale East MOD1 and Next DC S4 Data Centre would likely require similar items of equipment to the proposal, concurrent construction work could theoretically increase the worst-case noise levels identified in the acoustic assessment by around 3 dB (ie a logarithmic adding of two sources of noise at the same level). The likelihood of worst-case noise levels being generated by works on different projects at the same time is, however, considered low.

As such, cumulative construction impacts are not likely to significantly alter the predictions in the noise report and no specific mitigation is expected to be required.

The potential cumulative impacts from the proposal and other projects would continue to be considered as the project progresses when detailed construction planning is developed.

The works are understood to not require any vibration intensive items of equipment. As such, vibration impacts are expected to be negligible and have not been assessed further.

Operation

Acoustic modelling was undertaken to predict operational noise levels generated by the proposed warehouse and distribution development. The assessment takes into account the expected main sources of operational noise, which are:

- On-site light and heavy vehicle movements - On-site vehicles have been modelled using the data provided by the project's traffic consultant. The volumes are representative of the expected worst-case 15- minute period for the daytime, evening and night-time.
- Loading dock activities in hardstands – The various sources have been modelled in the hardstand areas (such as alarms, air brakes, roller doors and forklifts) based on the corresponding number of heavy vehicle movements in the worst-case 15-minute periods.
- Internal noise-generating activities at all warehouses are expected to generally be minimal. A sound power level of 75 dBA has been applied at openings in the facades of each warehouse to cover potential break-out noise from general internal activities, based on observations of loading activities at similar warehouse facilities.
- Mechanical plant - Indicative external mechanical plant types including condensers and extraction fans are assessed. The exact requirements for mechanical plant would be determined as the project

progresses when specifics are known about tenant requirements. Further assessment of mechanical plant would be completed during the production of later noise assessments when the selected mechanical plant is known.

- Off-site vehicle movement - Access routes to/from the site would be via Johnston Crescent and Old Wallgrove Road. The potential noise impacts from additional traffic have been assessed based on traffic data provided by the transport consultant.

A summary of the worst-case operational noise assessment at the receivers surrounding the proposal is shown in Table 18. Impacts have been predicted at all floors of the nearest receivers. The assessment indicates that noise from the proposal is predicted to comply with the Project Noise Trigger Levels (PNTLs) at all of the surrounding receivers.

Table 18 Operational Noise Assessment – Unmitigated

NCA Receiver	**Most-affected**	**Type**	**Period**	**Noise Level LAeq(15minute) (dBA)**			**Compliance**
Location				Noise Criteria	Predicted	Exceed	
NCA01	2b Aldington Rd, Kemps Creek NSW	Residential	Day	45	21	-	Yes
			Evening	43	19	-	Yes
			Night	38	19	-	Yes
NCA02	49-53 Greenway Pl, Horsley Park	Residential	Day	45	23	-	Yes
			Evening	43	21	-	Yes
			Night	38	21	-	Yes
NCA03	301-313 Burley Rd, Horsley Park	Residential	Day	44	33	-	Yes
			Evening	43	31	-	Yes
			Night	38	31	-	Yes
Commercial	2 Johnston Cr, Horsley Park	Commercial	Day	63	53	-	Yes
			Evening	63	51	-	Yes
			Night	63	51	-	Yes

Source: SLR

In addition, the predicted night-time maximum noise levels at the nearest residential receivers were assessed. The predictions include noise-enhancing weather conditions. The assessment shows that maximum noise levels are predicted to comply with the sleep disturbance screening level at the nearest residential receivers subject to the implementation of migration measures. Maximum noise levels from the development are unlikely to disturb sleep at these receivers and a detailed maximum noise level assessment is not required.

Table 19 Sleep Disturbance Assessment

NCA	**Type**	**Maximum Noise Level LAmax (dBA)**			**Below**
Sleep Dist. Screening Level			**Maximum Predicted Level**	**Exceedance**	**Screening Level**
NCA01	Residential	54	36	-	Yes

NCA	Type	Maximum Noise Level LAmax (dBA)			Below
NCA02	Residential	54	38	-	Yes
NCA03	Residential	54	49	-	Yes

Source: SLR

The Noise Policy for Industry (NPfI) states that it aims to limit continuing increases in cumulative industrial noise through the application of amenity noise levels, which are applicable to all industrial noise sources in an area.

The NPfI requires that the amenity noise levels which are applied to an individual project be reduced by 5 dB to allow for the potential cumulative impact from multiple sources of industrial noise in an area (including existing and new). This has been applied when determining the Project Noise Trigger Levels. As such, the potential cumulative impacts from the proposal and other potential sources of industrial noise in the area are accounted for in the proposal-specific PNTLs and, therefore, do not require further consideration.

In terms of cumulative operational noise impact, the Noise Policy for Industry accounts for potential cumulative impacts by lowering the criteria for each individual development to ensure that the ambient noise level within an area from all industrial noise sources combined remains below the recommended amenity noise levels, where feasible and reasonable. As such, the potential cumulative impacts from the proposal and other potential sources of industrial noise in the area are accounted for in the proposal-specific PNTLs and, therefore, do not require further consideration.

6.1.6.3. Mitigation measures

Construction

- The use of standard mitigation measures provided in the Transport for NSW Construction Noise and Vibration Guideline should be implemented during construction to minimise acoustic impact.
- A Construction Noise and Vibration Management Plan (CNVMP) should be prepared before any work begins. This should identify all potentially impacted receivers, assess the potential noise and vibration impacts from the proposal and provide details regarding how the impacts would be minimised through the use of all feasible and reasonable mitigation measures. The CNVMP should also contain procedures for handling complaints, should they occur, and detail any compliance monitoring requirements.

Operation

Where operational noise impacts from the development are predicted to exceed the relevant noise criteria, feasible and reasonable operational noise mitigation and management measures should be implemented, with the aim of reducing noise emissions to the relevant criteria. The potential feasible and reasonable mitigation measures that can be applied to the development are summarised in the Acoustic Report.

An Operational Noise Management Plan should be prepared subject to further refinement of these measures during detailed design when more details regarding specific tenants are known:

6.2. Standard Assessment

6.2.1. Trees and Landscaping

Scape were engaged to prepare the Landscape Master Plan (**Appendix L**) for the proposed development.

6.2.1.1. Existing Environment

The character of the site is cleared of any vegetation. The topography of the site can be characterised as benched but slightly undulating, with a gradual increase in slope to the southeast of the site.

6.2.1.2. Landscape Outcome

The proposed development seeks to enhance the landscape provision throughout the site. The setback and communal areas incorporate landscaping with a range of species. The development seeks to embellish ecological systems via the establishment of vegetation.

The landscape design incorporates trees to achieve 5.97% of canopy cover. This supports the landscaped outcomes for the site, which achieves 6.21% of the site as landscaped area. This total area acts to soften the edges of the warehouse units and place the landscape at the forefront of design at the public domain interface.

Permeable surfaces comprising a combination of native, endemic and some exotic vegetation, turf species and gravel are also low maintenance and adaptable to a range of climate conditions. Water Sensitive Urban Design (WSUD) principles have been used to address considerations for efficient water use and design in the landscape.

6.2.2. Aboriginal Cultural Heritage

The industry specific SEARs issued for this project requires preparation of AHCAR assessment. The Cover Letter (dated 29 May 2024) accompanying the SEARs and issued by DPHI, stated that 'preliminary and/or alternative assessment in relation to cultural heritage may be considered, if sufficiently justified by a suitably qualified person and to the satisfaction of Heritage NSW, who should be consulted as part of the required engagement when preparing the EIS.'

Urbis Heritage met with Heritage NSW in June 2024 to discuss the Aboriginal cultural heritage assessment requirements. A subsequent letter was prepared by Urbis Heritage and issued to Heritage NSW, which provided more details on site history, ground disturbance and supporting plans/photograph that documented the site conditions and the level of impact.

Heritage NSW confirmed in an email dated 17 July 2024, that given that the lands have undergone significant land use impacts, noting that all original soils have been removed, a compressed ACHAR can be undertaken for the project, which includes:

- Completion of Stage 1 (i.e., Notification of project proposal and registration of interest) of the Community Consultation Process as per the guidelines.
- Completion of Stage 2 to 4 of Consultation Process (i.e., Stage 2 Presentation of information about the proposed project, Stage 3 – Gathering information about cultural significance and Stage 4 Review of draft ACHAR) as a combined process.

The compressed ACHAR is attached at Appendix CC.

As per the recommendation of Heritage NSW, Stage 2,3 and 4 is carried out in one consolidated process, providing the opportunity for Registered Aboriginal Parties (RAPs) for commenting on the findings of the ACHA and provide cultural information on the subject area. A draft of the ACHAR was sent to RAPs via email on 11 September 2024, providing them with 30 days to respond. Two responses were received, no objections were raised, and the responses agreed with the outcome of the ACHAR assessment, which are:

- No previously identified Aboriginal objects or declared Aboriginal places are located within the subject area.
- Part of the subject area along the western boundary is located within 200 m of a waterway, while part of the subject area on the eastern boundary is located on a ridgeline, both of which are considered indicative of likely past Aboriginal land use. However, the significant ground disturbance caused by historical land use, including quarrying and backfilling to approximately 8m depth of the abandoned quarry removed this potential.
- Ground disturbance is assessed to be significant across the entire subject area, due primarily to quarrying activities in the subject area beginning in 1970s and more recent bulk earthworks and placement of imported fill during site remediation approved under previous DA (893.1-2013). Clear and observable modification of the landscape will have significantly disturbed, and removed any Aboriginal objects that may have existed within the subject area.
- In view of the significant ground disturbance across the entire subject area, the Aboriginal archaeological potential of the entire subject area is assessed to be Very Low to Nil.
- The subject area is assessed as having social and cultural significance to Aboriginal people for its connection to the broader cultural landscape and for the long connection Aboriginal people have with the area. However, no Aboriginal sites or evidence of a specific cultural association with the subject area itself have been identified.

- As there are no known Aboriginal objects within the subject area and it is unlikely to retain any as yet unknown Aboriginal objects, the proposed physical works are unlikely to cause either direct or indirect harm to Aboriginal objects or negatively impact inter-generational equity.
- As the proposed works are unlikely to harm any Aboriginal objects or declared Aboriginal places, it is recommended that no further investigation is required for the present development. The development may proceed with caution, subject to the following archaeological chance finds and human remains procedures.

Based on the above conclusions, Urbis recommends the following:

1. Unexpected Archaeological Finds Procedure - The following unexpected archaeological finds procedure should be followed in the unlikely event that any archaeological materials, or suspected archaeological materials, are uncovered during any works within the subject area:

- All works within the vicinity of the find must immediately stop and the location cordoned off with signage installed to stop any accidental impact to the finds. The find must not be moved 'out of the way' without assessment.
- The site supervisor or another nominated site representative must contact either the project archaeologist (if relevant) or Heritage NSW (Enviroline 131 555) to contact a suitably qualified archaeologist.
- The nominated archaeologist must examine the find, provide a preliminary assessment of significance, record the item and decide on appropriate management measures. Such management may require further consultation with Heritage NSW, preparation of a research design and archaeological investigation/salvage methodology and registration of the find with the Aboriginal Heritage Information Management System (AHIMS). Any management measures should be decided upon consultation with the RAPs.
- Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required and further archaeological investigation undertaken.
- Reporting may need to be prepared regarding the find and approved management strategies.
- Works in the vicinity of the find can only recommence upon receipt of approval from Heritage NSW.

2. Human Remains Procedure - The following human remains procedure should be followed in the unlikely event that any human remains, or suspected human remains, are uncovered during any works within the subject area:

- All works within the vicinity of the find must immediately stop and the location cordoned off with signage installed to stop any accidental impact to the finds.
- The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW (Enviroline 131 555).
- The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.
- Management recommendations are to be formulated by the NSW Police, Heritage NSW, site representatives and the RAPs.
- Works are not to recommence until the find has been appropriately managed.

6.2.2.1. Historic Archaeology

The subject property is not an identified archaeological item. The sites have limited historic archaeological potential due to the level of disturbance occurred onsite. Subsurface deposits (if there are any) are unlikely to be of heritage significance and are unlikely to yield new or significant information. The site is highly disturbed as a result of quarry. Notwithstanding the above, the provisions of the Heritage Act 1977 prevail in relation to unexpected finds.

General measures will need to be undertaken to ensure unexpected finds of Archaeology or Aboriginal sites or objects are not harmed if found onsite. These general measures include:

- If suspected Aboriginal objects, such as stone artefacts are located during future works, works must cease in the affected area and an archaeologist called in to assess the finds.
- If the finds are found to be Aboriginal objects, the OEH must be notified under section 89A of the NPW Act. Appropriate management and avoidance or approval under a section 90 AHIP should then be sought if Aboriginal objects are to be moved or harmed.
- In the extremely unlikely event that human remains are found, works should immediately cease and the NSW Police should be contacted. If the remains are suspected to be Aboriginal, the OEH may also be contacted at this time to assist in determining appropriate management

6.2.3. Ecologically Sustainable Design

E-Lab Consulting were engaged to prepare a Sustainability Report for the proposal to demonstrate the proposed ESD strategies incorporated into the development. The report details how the proposal will deliver sustainable outcomes with a strong commitment to sustainability in its design, construction and operation.

In addition, NABERS Embodied Emissions Material Form has been prepared by RLB and attached at **Appendix N**.

6.2.3.1. Existing Environment

The site experiences the urban heat island effect warmer than Sydney's baseline, so reducing heat at the local scale is recommended. In response to the fact Sydney is getting hotter, the site's baseline heatwave temperature experiences peaks approx. 3-6°C above the baseline, as defined by NSW government for Urban Heat Island Effect.

6.2.3.2. Findings

The report confirms the proposed strategies and initiatives demonstrate a strong commitment to sustainability which aligns with the statutory requirements contained within the DCP and Sustainable Buildings SEPP. This is demonstrated in the following table which summarises the proposed initiatives.

Table 20 Sustainability Initiatives

DESIGN RESPONSE	DESCRIPTION
Energy	The proposal employs a Net Zero Carbon Policy which outlines ESR's commitment to the following strategies which employ substantial energy efficiency measures to minimise the developments greenhouse gas emissions: ▪ Electrification– No gas will be used on site, enabling the development to be 'net zero ready'. ▪ Renewable Energy– The roof provides the opportunity to install a solar photovoltaic system to generate renewable electricity to offset grid use and minimise stress on the grid at peak times. ▪ Efficient Lighting Systems– LED lighting throughout with controls like motion sensors, time clocks and zoned switching. ▪ Controls, Energy Metering and Monitoring– Energy meters and monitoring systems will be provided. Preference for natural ventilation and comfort through adaptive cooling and shading. Mechanical ventilation to be controlled with bespoke controls and systems reducing energy consumption when not required. ▪ Hot Water – Hot water is likely to be provided by energy efficient heat pump systems which can be run off the solar PV system to reduce the operational carbon of the development.

	▪ Integration of Cool Roofing – roofing with a high albedo will reduce Urban Heat Island effect and load on the HVAC system. ▪ Net Zero Statement has been prepared by E-Lab and attached at **Appendix O**. The Net Zero Statement was prepared to align with the Sustainable Buildings SEPP requirements, which focuses on Scope 1, 2 and 3 emissions.
Water consumption and WSUD	Water saving initiatives will be implemented throughout the development to achieve the potable water targets, including: ▪ Sanitary Fixtures – By implementing low-flow water fixtures, the consumption will be significantly reduced. All sanitary fixtures are to be provided with the minimum WELS ratings outlined. ▪ Landscape Irrigation – Efficient irrigation systems will be considered, including underground surface drip systems, moisture sensors, and the use of native plants in the landscaping plan. ▪ Recycled water and rainwater – toilet flushing, irrigation, and washdown needs to be provided from a minimum 100kL onsite rainwater tank to reduce potable water demand. Additionally, stormwater re-use to be considered where possible to maximize usage which can be incorporated into landscape irrigation as well.
Materials	▪ Construction Waste – At least 90% of construction and demolition waste is diverted from landfill. ▪ Low VOC and Low Formaldehyde Materials – paints, adhesives, sealants, floor coverings, carpets and engineered wood will be selected appropriately to provide a healthier and low-impact environment. ▪ Best-Practice PVC – cables, pipes, flooring, and blinds will be selected and specified to be Best Practice PVC. This ensures upstream performance will be met and has significant benefit for the overall environment during the construction process. ▪ FSC/PeFC Timber throughout – where possible, timber, including virgin and engineered timber through construction and fitout elements under the builder's control will be specified as FSC/PeFC. This ensures the timber provided to site is of the highest standard and sourced from sustainable sources. ▪ Sustainable Concrete – where possible deemed practical from the LCA, concrete to implement sustainable mixtures of cement such as fly ash or blast slag to reduce embodied carbon. ▪ Waste Management Plan – Development of an ongoing Waste Management Plan so waste can be sorted and recycled.
Comfort and quality	To ensure comfort for users and visitors, the development will commit to the following initiatives: ▪ Visual Comfort – Maximising high-quality light into the office spaces, with views to the sky and nature where possible.

	▪ Acoustic Excellence – Designing the building layout to be protected from noise from external sources. Delicate material selection, acoustic attenuation, and designing the shape of the building and openings accordingly achieves the performance. ▪ Thermal Comfort – Appropriate mix of vernacular design, overhangs, adaptive comfort and high levels of insulation in the roof and facades. Adaptive cooling will be integrated into the design based on tenant needs and high-occupancy spaces. ▪ Lighting Comfort – Use of high colour rendering index (CRI > 85) LED lighting throughout the entire development. ▪ Glazing Requirement – ensuring external glass does not exceed 20% reflectivity to minimize discomfort from glare. ▪ Generous Natural Planting – Greenery through natural planting throughout assists in a connection to nature for users.
Urban Heat Island Mitigation	To minimise the urban heat island effect and provide a more comfortable environment for occupants, the development is to consider the following initiatives: ▪ Implement native landscaping throughout the site, particularly around offices where occupants visit regularly. ▪ Incorporate green walls and roofs where appropriate. ▪ Extensive tree planting with wide canopies throughout the above ground car park ▪ Introduction of architectural treatments to foster façade shading.

The proposal comprises office area that is greater than 1,000sqm, therefore the office component of the development is classified as 'large commercial development' for the purpose of clause 3.3 of the Sustainability SEPP. Thus, the office component of this development is required to achieve the following NABERS Energy and Water ratings under Schedule 3 of the Sustainability SEPP:

- 5.5 star NABERS energy rating and
- 3 star NABERS water rating

NABERS Agreement has been prepared by E-Lab to implement the stated commitments, no further mitigation measures are required.

6.2.4. Biodiversity

Fraser Ecological Consulting prepared a Biodiversity Development Assessment Report (BDAR) Waiver Request for the proposed development.

6.2.4.1. Existing Environment

The project area is characterised by existing cleared land with no vegetation. It has historically been absent of vegetation being a former quarry site. In addition, the site does not contain any groundwater dependant ecosystems or waterbodies.

6.2.4.2. Findings

No threatened flora or native plant community types (PCTs) exist onsite because there is no natural or remnant native vegetation that would meet the definitions. Therefore, no native PCTs would be impacted by the project. The modified soil profile is absent of vegetation, therefore, the project area does not contribute to connectivity with other habitats as it exists within the highly urbanised and fragmented landscape. In

addition, there are no habitat features suitable for fauna. Lastly, there is no water quality, water bodies or hydrological processes that could sustain threatened species and threatened ecological communities at the site.

In conclusion, the proposed development is unlikely to result in a significant impact on any listed species or communities. Therefore, in accordance with the EPA Act (1979) and BC Act (2016), a Biodiversity Assessment Report is not required.

A BDAR waiver has been granted by DPHI on 9 October 2024 and no further mitigation measure are required for biodiversity.

6.2.5. Ground and Water Conditions

6.2.5.1. Existing conditions and findings

Douglas Partners have been undertaking ongoing geotechnical assessments for the site and prepared a Report on Geotechnical and Salinity Investigation for the proposed development.

Acid sulphate soil:

Reference to the 1:25 000 Acid Sulphate Soil (ASS) Risk map indicates that the site is not known to be at risk of ASS. The nearest area of known ASS risk is a section of South Creek near Llandilo located 12 km to the north west of the site.

Typically, acid sulphate soils (ASS) is more prevalent in low-lying coast regions or along alluvial channels (typically below RL 7 m AHD). Given that the site is neither located in a coastal or alluvial region and was underlain by residual soils at around RL 75 m AHD, the presence of ASS within the underlying soils is unlikely. Geotechnical assessment of ASS and its associated risks are therefore not warranted for this site and no further investigation or mitigation measure is required.

Salinity

The site is located within an area identified as having a moderate salinity potential. The extent of quarrying and subsequent earthworks on the site are likely to have removed or covered over a significant part of the natural soil profile and thus the salinity potential would be based on the condition of the controlled fill placed on the site.

The field work for the current geotechnical and salinity investigation was conducted on12 July 2024 and 16 July 2024 and included, cone penetration tests (CPT) in 15 locations. The results of electrical conductivity tests coupled with textural classification tests demonstrate that the materials used as controlled fill were predominantly slightly saline, except for one sample which returned a non-saline classification.

For management of salinity risk, strategies are only required for salinity levels of moderately saline and higher and are therefore there is no need for a salinity management plan for this site.

Groundwater

Groundwater was not encountered in any of the boreholes during auger drilling or after the withdrawal of the CPT rods. Significant groundwater is unlikely to be encountered within the zone of influence of the development, given the elevated site levels by comparison to surrounding ground levels and the relative shallow depths of excavation accompanying development construction. Therefore no additional mitigation measure is required.

6.2.5.2. Other geotechnical related mitigation measures

Construction of should consider the following matters outlined in the report relating to:

- Site Excavation Conditions
- Site Preparation measures
- During bulk excavation and earthworks, it is recommended that temporary batter slopes do not exceed 1H:1V (45 degrees) within the fill and natural clay soils for batters up to 4 m high.
- Reqruiments for retaining wall if required.

- Confirmation of design footing parameters, it is recommended that all pad footing excavations bearing in soil are subjected to geotechnical inspection and dynamic cone penetrometer (DCP) testing during construction to verify that the listed allowable bearing pressures are available.
- Recommendation relating to pavement deisgn

6.2.6. Flood Risk

Flood assessment has been undertaken by Costin Rose Consulting and is attached at **Appendix U.**

The Updated South Creek Flood Study, by Worley Parsons, 8th May 2014 has been utilised to confirm the relationship between known flooding areas and overland flow paths with the development site.

The site is located within the Ropes Creek Catchment to the east of Ropes Creek. Using the Fairfield City Council flood planning maps in conjunction with the Worley Parson's South Creek Flood Study, the assessment concluded that the site has a very low risk of flooding affectation from Ropes Creek or other regional flooding. There is no risk that the new development will affect known overland flow paths or other flood affected areas, given local drainage systems for the development will be constructed per the recommendations included in the civil document.

The survey levels also show that the estate is not affected by any external catchments so flooding from local overland flow is also not considered to be a risk for the site.

Overall, the site is not flood effected and no further mitigation measures are required.

6.2.7. Hazards and Risks

The proposal is for a warehouse and distribution development which is intended to have a freight and logistics focus. The proposal itself is not potentially hazardous or potentially offensive development. Should an operator seek development consent for any purposes that would be classified as potentially offensive or hazardous, a Preliminary Risk Screening Assessment would be required to be prepared and submitted with a separate application for assessment and approval.

6.2.8. Contamination and Remediation

A Site Audit Report has been prepared by Enviroview in August 2023 to assess the entire Stage 3A project area. The Report and subsequent Site Audit Statement determines that the site is suitable for the proposed commercial and industrial land use, from a Site Auditor's opinion.

An independent review of the assessment and validation works conducted at the site and the subsequent environmental reports prepared for the site was completed. The Site Auditor also reviewed the works associated with the assessment of risk of potential landfill gas impact to the area arising from a former landfill site located to the west.

6.2.8.1. Existing Environment

The investigation, assessment and validation work completed have been reviewed to confirm that they meet the NSW EPA requirements and other guidelines approved under s.105 of the Contaminated Land Management Act 1997. The Site Auditor is satisfied the assessment and validation works have been appropriately undertaken.

6.2.8.2. Findings

The site has been determined to have been made suitable for the proposed commercial and industrial land uses. Potential contamination impacts have been appropriately remediated under previous works. In addition, a risk assessment evaluated a low risk of landfill gas migrating from the former landfill onto the Site Audit area and no further on-site management will be required.

No additional mitigation measures are prescribed under this proposal.

6.2.9. Waste Management

A Waste Management Plan (WMP) has been prepared by SLR Consulting to assess the proposed waste management for the development during construction and operation. The WMP identifies the potential wastes likely to be generated at the development and the appropriate handling arrangements to ensure it is adequately disposed.

6.2.9.1. Existing Environment

The site has been cleared of its existing development. There is no demolition required and any soil excavated on the site will be retained on site.

6.2.9.2. Potential Impacts

Construction Phase Waste

The potential construction waste likely to be generated relates to construction waste from materials, packaging waste, and work compound waste from on-site employees. The assessment estimates the type and quantities of waste generation from the construction of proposed buildings. Waste materials produced from construction activities will be separated at the source and stored separately on-site. The WMP notes there will be enough space on-site for separate storage of waste. In addition, accessible waste storage areas will be provided and allow for sufficient space for storage and servicing requirements. They will be flexible to cater for change of use throughout the project.

Operational Phase Waste

The operation of the warehouses will likely generate waste relating to domestic type waste, office waste, garden organic waste and bulky waste items. Quantities of operational waste have been estimated based on the proposed floor areas and waste generation waste prescribed by Council, the estimated quantities are shown below.

Table 21 Operational Waste quantities

Warehouse	**Use Type**	**Area (m^2)**	**(L/day)**		**(L/week)**	
General Waste		**Recycling**	**General Waste**		**Recyclables**	
Warehouse A1	Warehouse	10,825	1,083	1,083	7,578	7,578
	Office	520	42	31	291	218
	Total	**11,345**	**1,124**	**1,114**	**7,869**	**7,796**
Warehouse A2	Warehouse	8,388	839	839	5,872	5,872
	Office	517	41	31	290	217
	Total	8,905	880	870	6,161	6,089
Warehouse B	Warehouse	33,581	3,358	3,358	23,507	23,507
	Office	2,069	166	124	1,159	869
	Total	**35,650**	**3,524**	**3,482**	**24,665**	**24,376**

The estimated number of bins and waste storage space required are shown below:

Table 22 Recommended number of bins and storage areas

Warehouse	**Bin Capacity**		**Collection Frequency per Week**		**Number of Bins**	**Total number of bins**	**Recommended storage**
	Garbage	Recycle	Garbage	Recycle	Garbage	Recycle	sqm

Warehouse	Bin Capacity		Collection Frequency per Week		Number of Bins	Total number of bins		Recommended storage
Warehouse A1	3 m^3	3 m^3	3	3	1	1	2	10.9
Warehouse A2	3 m^3	3 m^3	3	3	1	1	2	10.9
Warehouse B	3 m^3	3 m^3	3	3	3	3	6	32.6

Warehouse	Recommended Storage Area (m^2) for bulky waste		
	Waste and recycling bins	Bulky waste	Total storage area
Warehouse A1	10.9	4	14.9
Warehouse A2	10.9	4	14.9
Warehouse B	32.6	4	36.6

The locations of the waste storage areas in accordance with the above area requirements are to the west of the site, adjacent to the office areas.

Waste will be separated and placed by tenants in bins for each stream in their storage locations. Waste collection vehicles will enter the site through the heavy vehicle entrance and drive to the bins. They will drive onto the bins, empty them into the collection vehicle, reverse off the bins, turn around and exit the site through the heavy vehicles exit.

6.2.9.3. Mitigation Measures

Waste minimisation measures outlined in the WMP will aid in achieving the resource recovery targets for construction and operational phases.

Construction waste management:

The Building Contractor, Building Designer and/or those in equivalent roles should follow better practice waste avoidance strategies outlined in the WMP.

Effective management of construction materials and waste, including options for reuse and recycling where applicable and practicable, will be conducted. Only waste that cannot be cost effectively reused or recycled is to be sent to landfill or appropriate disposal facilities.

Waste materials produced from construction activities will be separated at the source and stored separately on-site. A more detailed construction waste management plan will be prepared that will provide further information on waste storage on site during construction, these measures should include:

- Waste Servicing and Record Keeping
- Waste Servicing and Transport
- Signage requirements
- Site Inductions for waste management

- Waste monitoring and reporting

Operation waste management:

The following operational waste management strategies are proposed:

- Waste avoidance measures
- Possible re-use opportunities include establishing systems with in-house and supply chain stakeholders to transport products in re-useable packaging where possible.
- maximise recycling opportunities
- Education and communication on waste management initiatives and measures will be regularly and clearly conveyed to staff, cleaners and visitors
- Signs which clearly identify waste management procedures and provisions to contractors, staff and visitors will be posted at the Development as appropriate.
- Roles and Responsibilities of implement the operational measures

6.2.10. Social Impact

A Social Impact Assessment has been prepared by Mecone to assess the social impacts from the proposed development. The report provides an understanding of the social context and highlights the relevant strategies to mitigate the negative impacts and enhance the positive impacts from the development.

6.2.10.1. Existing Environment

A social baseline was established to inform an understanding of the existing social environment and the potentially affected communities. The social baseline is summarised below.

- Socio-demographic profile
    - Population and demographic composition: the population of the Horsley Park SAL was 1,790 people at the 2021 Census. This is a slight decrease from 2016. However, the Fairfield LGA grew in population which suggests a general trend of increasing attractiveness and liveability in the LGA. This positive demographic trend highlights the area's potential for further development and investment. It is projected that the population will grow to 247,803 by 2041. This represents an 18.9% increase compared to that projected across NSW (21%) between 2021 to 2041. In 2021, the median age of the population in the Horsley Park SAL was 45 years old. This is significantly older than the median age of 39 across the Fairfield LGA and NSW, but notwithstanding, the numbers highlight a high proportion of middle-aged adults.
    - Housing and households: The average household size in the Horsley Park SAL and Fairfield LGA was 3.2 persons in 2021. This is considerably larger than the average household size of 2.6 across NSW, which reflects a large number of families within the LGA.
    - Socio-economic factors: The median weekly household income was higher when compared to the NSW median weekly household income. Of the residents employed in Horsley Park, most were working in Clerical and Administrative (21.0%); Managers (16.9%); Professionals (15.1%); Technicians and Trade Workers (14.3%); and Machinery Operators and Drivers (9.6%) industries.
    - Access and movement: In 2021, approximately 40.2% of residents commuting from Horsley Park to work travelled via a vehicle, either as a driver or passenger, while only 0.6% opted for public transport. Horsley Park has a lower than LGA and state average of public transport commutes due to its relatively rural nature and distance from rail lines.
    - Vulnerable communities: Results reveal that Horsley Park is a more advantaged area when compared to the Fairfield LGA as a whole. This indicates that Horsley Park exhibits favourable socio-economic conditions relative to other suburbs and the LGA, likely characterised by higher average incomes and employment opportunities.
- Community Values

- The 2022–2032 Fairfield City Plan – Community Strategic Plan (CSP) reflects the key aspirations of the community for the social locality. It highlights values centred around a city that is vibrant, connected, safe and inclusive.

- Land use
  - The site is located in the 'South of Sydney Catchment Authority Warragamba Pipelines' precinct of the Western Sydney Employment Area, which forms one of the largest industrial precincts in Sydney. Its immediate surroundings are zoned IN1 – General Industrial and consist solely of large-footprint industrial developments such as warehouses.

6.2.10.2. Potential Impacts

The potential impacts generated by the proposed development are categorised in the following table.

Table 23 Potential Social Impacts

PROJECT ASPECT	IMPACT	RATING
Surroundings & Health and Wellbeing		
Construction	Generation of dust from earthworks and construction activities impacting the surroundings of proximal residents.	Negative
	Generation of noise and vibration from construction activities impacting the surroundings of proximal residents.	Negative
	Generation of noise and vibration from construction vehicles and equipment impacting the surroundings of proximal residents.	Negative
	Generation of waste from construction activities impacting the surroundings of proximal residents.	Negative
	Visual impacts from construction machinery, scaffolds and construction blockages.	Negative
Operation	Potential for increased noise and vibration levels from warehouse operations and vehicle movements affecting the amenity of surrounding areas for proximal residents.	Negative
	Increase pollution from warehouse operation impacting the surroundings of proximal residents.	Negative
	Visual impacts from warehouse buildings, lighting, and signage.	Negative
Surroundings and Accessibility		
Construction	Increased traffic congestion and delays on local roads due to construction vehicle movements.	Negative
Operation	Potential for increased traffic congestion and delays on local roads affecting the accessibility of the area for other users.	Negative
Way of Life and Community		
Construction	Potential for negative social impacts on community cohesion and well-being due to construction-related disruptions.	Negative
Operation	Potential for changes in the character and atmosphere of the local area due to the presence of a large industrial facility.	Negative

Livelihoods		
Construction	Potential for positive economic impact through creation of temporary employment opportunities during the construction phase.	Positive
Operation	Potential for positive economic impacts on the local community through direct job creation and increased economic activity.	Positive
Engagement and Decision-Making Systems		
Project Determination	Opportunity for the local community to participate meaningfully and influence project decision making due to existing high-level awareness of project and activities in community.	Positive

An evaluation of impacts was completed by applying mitigation measures and enhancement to reduce negative project impacts and achieve greater positive project benefits and social outcomes. Overall, the assessment concludes that the identified negative social impacts can be reasonably mitigated or managed to reduce their significance, while positive impacts will increase in significance if appropriate enhancement measures are put in place

6.2.10.3. Mitigation Measures

The specific mitigation measures are summarised below. If appropriately applied, the identified negative impacts can be minimised. Many of these measures are achieved through their separate assessments and have been incorporated into the proposal.

- Implementation of a Construction Environmental Management Plan (CEMP) detailing compliance requirements. Provide community with information detailing the complaints procedure during construction.
- Implementation of Construction Noise and Vibration Management Plan (CNVMP) and an Operation Noise and Vibration Management Plan (ONVMP).
- Effective communication and engagement with the community to minimise social anxiety and keep community well informed.
- Consider visual screening from public viewpoints.
- Implementation of a Construction Traffic Management Plan (CTMP) consistent with other approvals in the area.
- Implementation of a Operational Traffic Management Plan (OTMP) consistent with other approvals in the area.
- Keep the local community informed around the construction hours and any subsequent changes.
- Strategy in place to attract and maximise employment creation.
- Proactive and ongoing information sharing about the project and associated opportunities.

6.2.11. Infrastructure Requirements and Utilities

Costin Roe Consulting prepared a Civil Engineering Report to detail the existing and proposed infrastructure services. The report provides an overview of the layout of existing service networks identified by Dial Before You Dig (DBYD) information, and the indicative utility demands for the proposal.

An assessment of existing services infrastructure has been undertaken to determine the suitability of existing supply and the need for augmentation and or extensions to suit the proposal. The following services were reviewed:

- Potable water (drinking water)
  - Sydney Water is the servicing authority for potable water in the suburb.

- The existing potable water assets within the site area include:
    - A 150mm oPVC line in Johnston Crescent on both east and west side of the development; and
    - A 300mm DICLSC line in Reserved Road on the north of the development.
- No connections are currently available from the existing potable water infrastructure to the development lot. A new connection can be made to the existing infrastructure and no upgrades or augmentation are required for this development.
- A Notice of Requirements prepared by Sydney Water will be obtained for the approval of the development, which will confirm connections requirements to the subject site and the new development.
- Detailed design will be prepared and approved by Sydney Water post development approval.

- Wastewater (sewer)
    - Sydney Water is the servicing authority for potable water in the suburb.
    - The existing Sydney Water wastewater assets within the site area include:
        - A 225mm PP line within the development lot fronting the east of Johnston Crescent; and
        - A 375mm GRP line in Reserved Road on the north of the development.
    - No connections are currently available from the existing wastewater infrastructure to the development lot. A new connection can be made to the existing infrastructure and no upgrades or augmentation are required for this development.
    - A Notice of Requirements prepared by Sydney Water will be obtained for the approval of the development, which will confirm connections requirements to the subject site and the new development.
    - Detailed design will be prepared and approved by Sydney Water post development approval.
- Recycled Water
    - No recycled water infrastructure is present in the vicinity of the proposed development.
- Electricity
    - Endeavour Energy is the Electrical Authority in the site area and will issue approvals for the required electrical connection for the development site.
    - Endeavour Energy provided confirmation that the electrical capacity at the frontage of the site (2MVA) is sufficient to cater for the expected maximum demand of 1.85MVA from the proposed development. If a large load customer requires more than 2MVA, additional capacity if available from Eastern Creek Zone Substation.
- Gas
    - Jemena is the gas Authority in the site area. Gas is not proposed as part of the development.
- Communications
    - NBN Co and Telstra are the relevant Communications Authority in the site area.
    - Existing NBN / Telstra services are available in Johnston Crescent and can be readily extended to the development site. The need for minor extensions will be confirmed with NBN Co / Telstra following issuance of the approval.

As detailed above, the review demonstrates the estate already has adequate services and infrastructure to cater or the proposed development. Connections will be made via the relevant authority approvals process to suit the proposed development layout. No infrastructure upgrades or augmentation is proposed to accommodate the needs of this development.

6.2.12. Water Management

A Civil Engineering Report Incorporating Water Cycle Management Strategy has been prepared by Costin Roe Consulting to determine the effects of the proposed development to the surrounding environment and the appropriate water management strategies.

6.2.12.1. Existing Environment

The site currently has limited existing formal drainage systems. The site primarily drains to a small tributary off Ropes Creek on the north of the estate, which connects to the main Ropes Creek channel downstream of the Sydney Water Pipeline, about 1km northwest of the site.

A trunk drainage system for minor storm events through a conventional pit and pipe system has now been constructed as part of the former CSR estate infrastructure construction under previous approvals. Multiple lot discharge connection points, in the form of Reinforced Concrete Pipes pipe stubs, have been provided as part of the constructed former CSR estate drainage system for allowance for discharge and conveyance of individual lot developments

6.2.12.2. Findings

The proposed development delivers a series of Water Cycle Management measures into the development to meet the relevant water requirements and targets. The objectives pertain to water quantity, water quality, flooding, water supply and erosions and sediment control.

Water Quantity

Stormwater quantity management is proposed for the site to reduce the impact of the development on existing drainage systems by limiting post development discharge within the receiving waters to the pre-development peak. It additionally seeks to ensure no affectation of upstream, downstream or adjacent properties.

The proposed attenuation of stormwater runoff from the whole of the development will be managed through several OSD systems. The final system for each individual tank would depend on site constraints and final layout. It is noted that although a different system may be adopted, the required stormwater management objectives are to be met for the development as a whole.

Rainwater harvesting is also proposed. The use of rainwater reduces the mains water demand and the amount of stormwater runoff. By collecting the rainwater run-off from roof areas, rainwater tanks provide a valuable water source suitable for flushing toilets and landscape irrigation. The water balance assessment predicts 40% reduction in non-potable water will be met for the development with the provision of rainwater tanks. The proposed tank size is approximately 70kL, with the final configuration and sizing subject to detail design considerations and optimum site utilisation.

The development does not increase runoff from existing conditions and, as such, the site discharge will not adversely affect any land drainage system or watercourse following completion of development works. An existing and reliable water supply is available during operations. Impact on environment from water use is considered to be acceptable.

Water Quality

The proposal will incorporate the principles of Water Sensitive Urban Design (WSUD) to target pollutants that are present in the stormwater to minimise the adverse impact on receiving waters. The requirements for stormwater quality are to be performed on a catchment wide basis. These are presented in terms of annual percentage pollutant reduction on develop catchment.

The impervious areas of the estate, including roof, hardstand, carparking, roads and other areas are required to be treated by the Stormwater Treatment Measure (STM's). The STM's will be sized according to the whole catchment area of the development and are based on the treatment train approach at the estate level to ensure that all the objectives are met. The components of the treatment train includes:

- Proposed development lot will require on-lot treatment measures which meet the load-based percentage requirements.
- On-lot systems will comprise proprietary filters in combination with pit inserts. The use of Ocean Protect Stormfilter filtration cartridges and pit baskets will mitigate any increase in stormwater pollutant load generated by the development.

- A portion of the building roofs will also provide a level of treatment via rainwater reuse and settlement within rainwater tank.

MUSIC modelling was performed to assess the effectiveness of the selected treatment trains and to ensure that the pollutant retention requirements have been met for the site. The modelling demonstrates the proposed treatment train of STM's will provide stormwater treatment which will meet council requirements in an effective and economical manner. This confirms the pollutant removal efficiencies of the treatment devices are considered to appropriately meet the relevant Council DCP requirements.

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. A preliminary sediment and erosion control plan has been prepared and is contained within the civil drawing.

6.2.13. Bush Fire Risk

A letter of Bushfire Advice has been prepared by BlackAsh Bushfire Consulting to confirm the relevant assessment required and potential impacts from a bushfire hazard perspective. The letter identifies that the site is not located on designated bushfire prone land and therefore not subject to bush fire threat on or adjoining the site. As such, the proposal is not required to apply the bushfire planning and building provisions including the Planning for Bushfire Protection 2019. In summary, a bush fire assessment is not required and there are no legislative bushfire assessment or protection requirements for the proposed development.

6.2.14. BCA, Accessibility and Fire Safety

BCA and Accessibility

BCA and accessibility review has been undertaken by BM+G. The following documentation has been reviewed:

- Disability (Access to Premises – Buildings) Standards 2010
- Building Code of Australia 2022 (BCA)
- The Guide to the Building Code of Australia 2022
- AS 1428.1:2009 Design for access and mobility - General requirements for access - New building work
- AS1428.2:1992 Design for access and mobility - Enhanced and additional requirements - Buildings and facilities
- AS1428.4.1:2009 Design for access and mobility - Means to assist the orientation of people with vision impairment - Tactile ground surface indicators
- HB198:2014 Guide to the specification and testing of slip resistance of pedestrian surfaces

Key compliance issues have been identified that require further resolution, either by way of fire engineered Performance Solutions or plan amendments prior to the construction certificate stage. Notwithstanding the above, it is considered that the proposed development can readily achieve compliance with the BCA and Disability (Access to Premises – Buildings) Standards 2010 and Part D4 provisions subject to resolution of the matters identified in this report.

Fire Safety

Fire safety review has been undertaken by Affinity Fire Engineering. The design is anticipated to achieve compliance with the relevant fire safety BCA regulations through a combination of Deemed-to-Satisfy (DtS) Provisions and a fire engineered Performance Solutions.

7. Justification of the Project

This section of the report provides a comprehensive evaluation of the project having regard to its economic, environmental and social impacts, including the principles of ecologically sustainable development.

It assesses the potential benefits and impacts of the proposed development, considering the interaction between the findings in the detailed assessments and the compliance of the proposal within the relevant controls and policies.

7.1. Project Design

This application seeks approval for development for warehouse and distribution purposes. The proposed works will compromise site preparation works, development of two warehouse and distribution centre buildings, carparking and associated civil and landscaping works.

As mentioned in Section 1, the identified project objectives of the proposal are as follows:

- Construct a high-quality warehouse and logistics estate within an emerging warehousing and industrial precinct in Horsley Park;
- Expand and support the operation of the recently completely ESR Horsley Logistics Park Stage 1 development south of the site;
- Better utilise land which has previously been used for quarrying;
- Create both temporary and permanent job opportunities through the construction and operational phase of the Proposal;
- Minimise visual, obstruction of light or glare, noise or any other such impacts on nearby properties;
- Incorporate specialist technical recommendations to provide a holistic response to the careful siting and design of the Proposal; and
- Avoid unacceptable environmental impacts associated with the Proposal through adopting recommended measures to avoid, minimise or manage potential impacts.

The assessment demonstrates that the proposed site layout plan maximises the site opportunities and identifies outcomes which meet the overarching objectives for the WSEA. This is achieved by providing an efficient layout that optimises the land for future tenant use whilst ensuring landscaping and future infrastructure corridors are integrated and enhanced within the overall development design.

Alternatives Considered

As mentioned in **Section 2.4**, the proposed development on the site has been informed by a series of detailed technical investigations and layout plan options to arrive at the preferred Site Layout Plan.

The technical investigations have also been used to address the existing site conditions and parameters which guide the proposed development. This also helps to inform the design alternatives for the site in order to identify the most feasible solution that best achieves both planning and environmental outcomes.

In addition, the ‘Do-nothing’ scenario for the site would result in misalignment with current statutory and strategic policy directions pertaining to the site and the broader precinct it forms part of. Through this process, the preferred design option was refined to produce a Site Layout Plan which maximised the opportunities associated with the site and defined the constraints and impacts which would be assessed and mitigated as part of this SSDA.

Mitigation Measures

As mentioned in **Section 6** of this EIS, the Project is capable of being constructed and delivered subject to the mitigation measures defined, and consolidated within **Appendix D**.

7.2. Strategic Context

The proposal aligns with the strategic direction and objectives established for the site and surrounding lands within the WSEA. Furthermore, the Project aligns with the broader strategic context established by the Region Plan and District Plan as demonstrated in **Section 2**.

The development presents a design solution that respects the important role of the site in providing a secure and reliable supply of employment land in the economic foundation of the WSEA to meet project future demand over the next decade. The development within the site will form part of a larger Logistic Park which is supported by road infrastructure to the rest of WSEA. The proposed development will create high quality industrial lands for warehouse facilities in strategic locations to support the population and development growth of the area. The project maximises the employment generating potential of the land to create an efficient and attractive Logistic Park.

Adequate consideration has been given to the relevant strategic policies as required by the SEARs and provided in **Section 2** of this EIS and finds the site to be suitable for the proposal from a strategic point of view.

7.3. Statutory Context

The relevant State and local environmental planning instruments are listed in **Section 4** and assessed in **Appendix C**. The assessment concludes that the proposal complies with the relevant provisions within the relevant instruments as summarised below:

- The proposed development has been assessed and designed in respect to the relevant objects of the EP&A Act as defined in Section 1.3 the Act and addressed in **Appendix C**.
- This EIS has been prepared in accordance with the SEARs as required by Schedule 2 of the EP&A Regulations.
- This SSDA pathway has been undertaken in accordance with the Planning Systems SEPP as the proposed development is classified as SSD.
- Concurrence from TfNSW will be required as per the T&I SEPP for 'traffic generating development'.
- The proposal complies with all of the relevant provisions under the Industry and Employment SEPP. The proposed development is consistent with the objectives of the E4 zone.
- The proposed development has been assessed in accordance with the R&H SEPP and the development complies with the relevant clauses.
- Clause 2.10 of the Planning Systems SEPP states that DCPs do not apply to State Significant Development. Nonetheless, an assessment of the proposed development against the relevant controls has been provided. The proposal generally accords with the relevant built form provisions of the WSEA Fairfield DCP 2013 as outlined in **Appendix C**.

7.4. Community Views

Community and stakeholder engagement has been undertaken by Urbis and the Project Team in the preparation of the SSDA. No feedback from the members of the community were received as part of the consultation process.

7.5. Likely Impacts of the Proposal

The proposed development has been assessed considering the potential environmental, economic and social impacts as outlined below:

- **Natural Environment**: the proposal addresses the principles of ecologically sustainable development **(ESD**) in accordance with the requirements at Clause 194 of the Regulations and as outlined below:
  - Precautionary principle: the precautionary principle relates to uncertainty around potential environmental impacts and where a threat of serious or irreversible environmental damage exists, lack of scientific certainty should not be a reason for preventing measures to prevent environmental degradation. The site is zoned E4 General Industrial which is zoned for the purpose of employment development. Therefore the proposed land use and the development will not contribute to environmental degradation within a site that is deemed suitable for development. In addition, additional landscaping and vegetation are provided to enhance environmental outcome.
  - Intergenerational equity: the needs of future generations are considered in decision making and that environmental values are maintained or improved for the benefit of future generations. The proposed development seeks to balance the needs of the future generation by introducing WSUD treatments

which will adequately manage water quantity and quality across the site to ensure that no undue impacts are experienced elsewhere.

  - Conservation of biological diversity and ecological integrity: the site currently do not comprise any existing vegetation. The proposal will provide additional landscaping and trees onsite which will enhance the biological diversity and ecological integrity of the site.

  - Improved valuation, pricing and incentive mechanisms: this requires the holistic consideration of environmental resources that may be affected as a result of the development including air, water and the biological realm. It places a high importance on the economic cost to environmental impacts and places a value on waste generation and environmental degradation. The Project adopts a range of management practices that relate to ESD and greenhouse gas emission, waste minimisation and management, acoustic impacts and stormwater drainage to mitigate the environmental impacts of the proposal. All of the proposed mitigation measures will be at the cost of the developer and results in the balanced development of the site and associated feasibility

- **Built Environment**: The Project has been designed in respect to the precinct wide road network and proposed major infrastructure projects, as well as adjoining landowners to ensure that the proposal is generally consistent with the vision of WSEA. It is considered that the proposed development is consistent with the vision of the WSEA and provides for the orderly development of future stages of development.

  The Project will deliver a built environment that is supported by sufficient landscape zones along street frontages. The built form treatment reinforces key streetscape frontages within the internal road network and the public domain through architectural façade design and landscape treatment.

- **Social**: The Project seeks to deliver employment uses to provide greater employment opportunities within Western Sydney, by providing jobs closer to homes as envisaged by the Region Plan. The Project provides sufficient indoor and outdoor communal spaces to provide amenities for workers. The allocation of landscaping is provided throughout the site to soften the transition with adjoining uses and to create an attractive outcome that defines the urban character around the periphery of the site. The Project will not result in any undue social impacts and will provide an improved outcome.

- **Economic**: The project will create approximately 508 direct jobs during operation, and approximately 306 jobs will be delivered during construction.

The potential impacts can be mitigated, minimised or managed through the measures discussed in detail within **Section 6** and as summarised in **Appendix D** to this EIS.

7.6. Suitability of the Site

The site is considered highly suitable for the proposed development for the following reasons:

- The proposed land uses are permissible in the E4 zone, and the development is consistent with the zone objectives as established in the Industry and Employment SEPP.

- The Project is consistent with the relevant State and local strategic and statutory policy.

- The Project aligns and has been designed in respect to the emerging local character of the WSEA, and adequate consideration is given to the site-specific constraints and opportunities.

- The Project will deliver the required infrastructure services to ensure that the development can operate from a utility point of view. The site has already been remediated and has been made suitable for the proposed use.

- The detailed impact assessment undertaken for the Project demonstrates that the proposed development can occur without any unacceptable environmental impact, subject to the implementation of the mitigation measures in **Appendix D**.

7.7. Public Interest

The proposed development is considered in the public interest for the following reasons:

- The proposal is consistent with relevant State and local strategic plans and substantially complies with the relevant State and local planning controls.

- No adverse environmental, social, or economic impacts will result from the proposal.
- The proposal will provide 306 construction jobs, 508 additional ongoing direct jobs within a land identified for industrial employment uses.

Having considered all relevant matters, we conclude that the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

8. Disclaimer

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