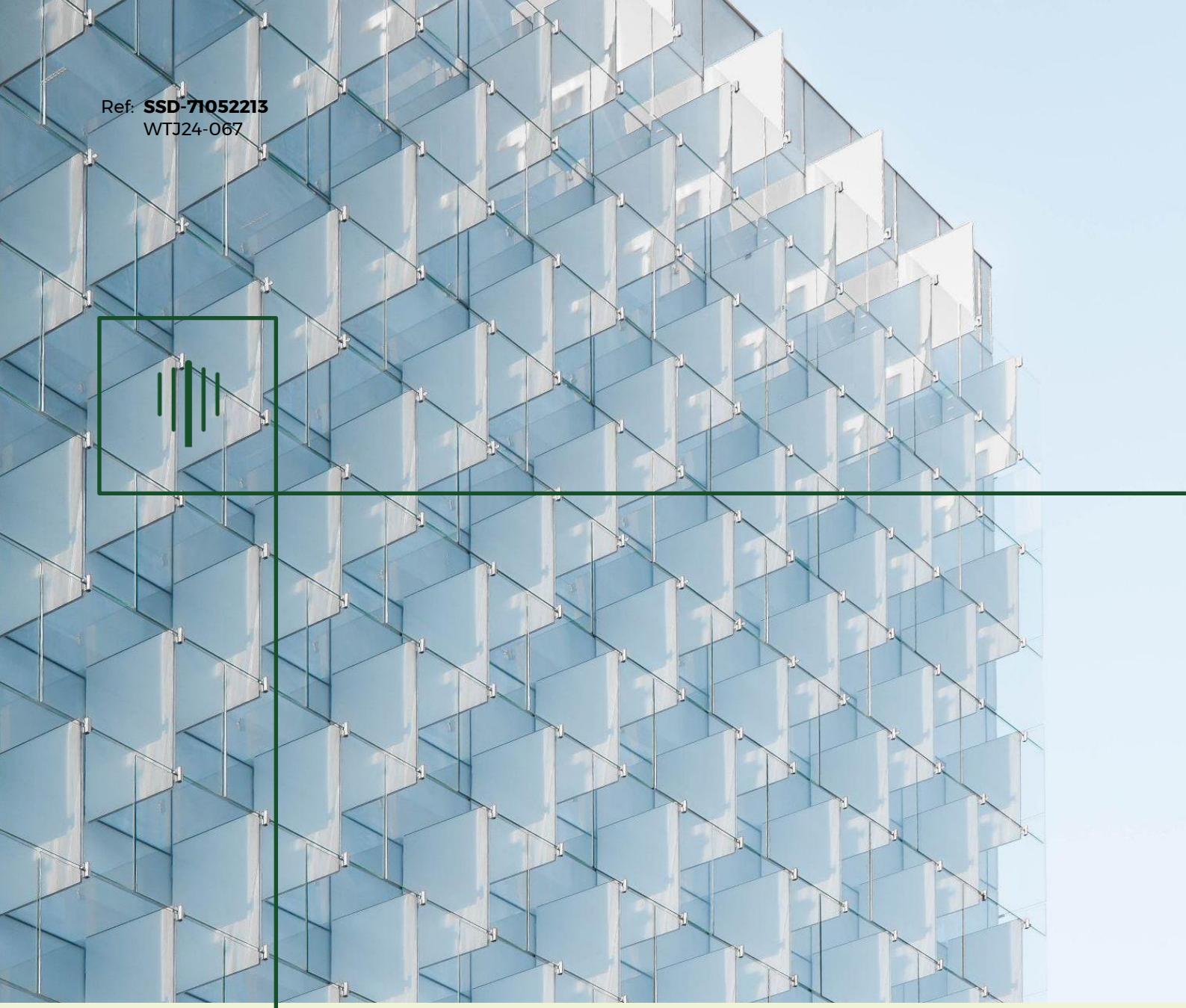

Ref: **SSD-71052213**
WTJ24-067

WILLOWTREE PLANNING

ENVIRONMENTAL IMPACT STATEMENT:
PROPOSED REFURBISHMENT OF THE EXISTING CHEMICAL MANUFACTURING AND ASSOCIATED WAREHOUSE OR DISTRIBUTION CENTRE

15 AND 20 GOW STREET, PADSTOW
LOT 100 DP1011185 and LOT 53 DP1064349

—

Prepared by Willowtree Planning Pty Ltd
on behalf of Selleys (Dulux Group Australia Pty Limited)

15 November 2024

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—

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WILLOWTREE
PLANNING

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

DOCUMENT CONTROL TABLE			
Document Reference:	SSD-71052213_Environmental Impact Statement		
Contact:	Cameron Gray		
Version and Date	Prepared by	Checked by	Approved by
Version No. 0 – DRAFT (05/09/2024)	Cameron Gray Senior Associate	Andrew Cowan Director	Andrew Cowan Director
Version No. 1 – DRAFT (13/09/2024)	Cameron Gray Senior Associate	Andrew Cowan Director	Andrew Cowan Director
Version No. 2 – DRAFT (24/10/2024)	Cameron Gray Senior Associate	Andrew Cowan Director	Andrew Cowan Director
Version No. 3 – DRAFT (04/11/2024)	Cameron Gray Senior Associate	Andrew Cowan Director	Andrew Cowan Director
Version No. 4 – FINAL (14/11/2024)	Cameron Gray Senior Associate	Andrew Cowan Director	Andrew Cowan Director

EIS DECLERATION

Declaration Form: Submission of EIS	
Project Details	
Project name	Gow Street Manufacturing and Warehouse Facility
Application number	SSD-71052213
Address of the land on which the development is to be carried out	15 and 20 Gow Street, Padstow
Proponent Details	
Proponent name	Selleys (Dulux Group Australia Pty Limited)
Proponent address	1 Gow Street Padstow NSW 2211
Details of person by whom this EIS was prepared	
Name	Camreron Gray
Address	Level 2, 165 Walker Street North Sydney, NSW 2060
Professional qualifications	Bachelor of Planning University of New South Wales
Declaration by registered environmental assessment practitioner	
Name	Andrew Cowan
Registration number	135475
Organisation registered with	PIA
Declaration	The undersigned declares that this EIS: ▪ has been prepared in accordance with Part 8 of the *Environmental Planning and Assessment Regulation 2021*; ▪ contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates; ▪ does not contain information that is false or misleading; ▪ addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project; ▪ identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments; ▪ has been prepared having regard to the Department's *State Significant Development Guidelines - Preparing an Environmental Impact Statement*; ▪ contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development; ▪ contains a consolidated description of the project in a single chapter of the EIS; ▪ contains an accurate summary of the findings of any community engagement; and ▪ contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.
Signature	
Date	15 November 2024

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Appendix 10	Biodiversity Development Assessment Report
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GLOSSARY OF KEY TERMS

TERM	MEANING
AHD	Australian Height Datum
BAM	Biodiversity Assessment Methodology
BCA	Building Code of Australia
BC Act	*Biodiversity Conservation Act 2016*
BC Regulation	*Biodiversity Conservation Regulation 2017*
BDAR	Biodiversity Development Assessment Report
BOS	Biodiversity Offset Scheme
CBD	Central Business District
CBDCP2023	Canterbury-Bankstown Development Control Plan 2023
CBLEP2023	*Canterbury-Bankstown Local Environmental Plan 2023*
CEMP	Construction Environmental Management Plan
Council	Canterbury-Bankstown Council
CTMP	Construction Traffic Management Plan
DA	Development Application
DCP	Development Control Plan
DP	Deposited Plan
DPHI	Department of Planning, Housing and Infrastructure
EDC	Estimated Development Costs
EES	Environment, Energy and Science Group
EIS	Environmental Impact Statement
EP&A Act	*Environmental Planning and Assessment Act 1979*
EP&A Regulation	*Environmental Planning and Assessment Regulation 2021*
EPA	Environment Protection Authority
EPBC Act	*Commonwealth Environment Protection and Biodiversity Conservation Act 1999*
EPI	Environmental Planning Instrument
EPL	Environmental Protection Licence
ESD	Ecologically Sustainable Development
FRNSW	Fire and Rescue NSW
FSR	Floor Space Ratio
GFA	Gross Floor Area
GHG	Greenhouse Gas
GSC	Greater Sydney Commission
LGA	Local Government Area
MNES	Matter of National Environmental Significance
MUSIC	Model for Urban Stormwater Improvement Conceptualisation
NCC	National Construction Code
NOR	Notice of Requirements
NSW RMS	NSW Roads and Maritime Services
OEH	NSW Office of Environment and Heritage
POEO Act	*Protection of the Environment Operations Act 1997*
RL	Reduced level
SEARs	Secretary's Environmental Assessment Requirements (SSD-71052213), dated 18 June 2024

SEPP	State Environmental Planning Policy
SIDRA	Signalised & unsignalised Intersection Design and Research Aid
m²	Square metres
Subject Site	15 and 20 Gow Street, Padstow
TfNSW	Transport for NSW
VIA	Visual Impact Assessment
VPA	Voluntary Planning Agreement
Willowtree Planning	Willowtree Planning Pty Ltd
WM Act	*Water Management Act 2000*
WMP	Waste Management Plan
WSUD	Water Sensitive Urban Design

SUMMARY

This Environmental Impact Statement (EIS) has been prepared by Willowtree Planning Pty Ltd (Willowtree Planning), on behalf of Selleys (Dulux Group Australia Pty Limited) (the Proponent). The EIS is submitted to the New South Wales (NSW) Department of Planning, Housing and Infrastructure (DPHI), in support of an application for State Significant Development (SSD), for the refurbishment of a chemical manufacturing facility and associated warehouse or distribution centre at 15 and 20 Gow Street, Padstow (Lot 100 DP1011185 and Lot 53 DP1064349).

The proposal involves the refurbishment of a chemical manufacturing facility and associated warehouse or distribution centre (identified as the Gow Street Manufacturing and Warehouse Facility), comprising:

- Demolition of existing warehouse and maintenance building;
- Remediation of the Subject Site;
- Strip out and refurbishment of existing warehousing space to create a state of the art manufacturing facility with ancillary raw materials storage which will continue to be operated by the Dulux Group and Selleys;
- Construction of external tank storage and tanker unloading area; and
- Remodeling of the existing vehicle access to allow uni-directional truck flow.

The proposed development is to be located at 15 and 20 Gow Street, Padstow, more formally described as Lot 100 DP1011185 and Lot 53 DP1064349. Such land is described throughout this EIS as the 'Subject Site'.

The Subject Site is located within the Canterbury-Bankstown Local Government Area (LGA) and is zoned IN1 General Industrial, pursuant to the *Canterbury-Bankstown Local Environmental Plan 2023* (CBLEP2023). The proposed development falls within the definition of 'general industries', which is permissible with consent in the IN1 General Industrial zone of the CBLEP2023.

The proposal satisfies the definition of SSD pursuant to:

- Schedule 1, Section 10 of *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP), being development for the purposes of the manufacture of adhesives with an Estimated Development Cost (EDC) of more than $30 million.

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

Under the *Environmental Planning & Assessment Act 1979* (EP&A Act), it is required that a request for SEARs must be made prior to the lodgement of any application for SSD. SEARs were requested for the proposed development (reference: SSD-71052213) and later issued by the NSW DPHI on 18 June 2024 (refer to **Appendix 1**) in the form of project-specific SEARs.

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

1. Statutory and Strategic Context
2. Community and Stakeholder Engagement
3. Traffic and Transport
4. Noise and Vibration
5. Air Quality and Odour
6. Water Management
7. Flooding
8. Contamination

9. Soils
10. Hazard and Risk
11. Fire and Emergency Services
12. Visual
13. Waste Management
14. Infrastructure Requirements
15. Aboriginal Cultural Heritage
16. Non-Aboriginal Cultural Heritage
17. Biodiversity
18. Social
19. Ecologically Sustainable Development
20. Planning Agreement/Development Contributions

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

Further, the proposed development would be consistent with the objectives of CBLEP2023 and relevant IN1 General Industrial zone. The proposal is suitable for the local context and shall not result in any significant environmental impact. As such, it is recommended that the proposal be supported by the NSW DPHI for approval, subject to reasonable and relevant conditions.

SITE CONTEXT

The Subject Site is legally described as Lot 100 DP1011185 and Lot 53 DP1064349, with frontage to Gow Street. The Subject Site has a total area of approximately 6ha and is positioned within an established industrial area.

Figure 1. Site Context Map (Source: Nearmap, 2024)

PROJECT DESCRIPTION

The proposed development seeks consent for the refurbishment of a chemical manufacturing facility and associated warehouse or distribution centre at the Subject Site, to be occupied by Selleys.

The development consent sought comprises the following aspects of development:

- Demolition of existing warehouse and maintenance building;
- Remediation of the Subject Site;
- Strip out and refurbishment of existing warehousing space to create a state of the art manufacturing facility with ancillary raw materials storage which will continue to be operated by the Dulux Group and Selleys;
- Construction of external tank storage and tanker unloading area; and
- Remodeling of the existing vehicle access to allow uni-directional truck flow.

PLANNING AND LEGISLATIVE FRAMEWORK

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

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

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

PUBLIC NOTIFICATION AND CONSULTATION

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

- Canterbury Bankstown Council;
- Department of Climate Change, Energy, the Environment and Water, specifically the:
    - Environment and Heritage Group;
    - Water Group;
    - Environment Protection Authority;
- Heritage NSW;
- Transport for NSW;
- Fire & Rescue NSW;
- Sydney Water;
- Endeavour Energy;
- Jemena;
- Surrounding local landowners, businesses and stakeholders;
- Local and regional community and environmental groups;
- Gandangara Local Aboriginal Land Council;
- Other utilities or community service providers.

The consultation process is detailed in **PART E** and **Appendix 18**.

ENVIRONMENTAL IMPACT ASSESSMENT

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

The proposed development is considered acceptable in a legislative sense.

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

1. **Statutory and Strategic Context** – The proposal is entirely consistent with the Objects of the EP&A Act. The appropriateness of the proposed development is also demonstrated through compliance with the CBLEP2023 in that it achieves the employment generating outcomes envisaged for the Subject Site, with minimal impact on surrounding uses and environments. Reference should be made to Section 2.2, Part 4 and Appendix C of this EIS.

2. **Community and Stakeholder Engagement** – A detailed engagement plan was developed and undertaken in consultation with the proponent and in line with the NSW DPHI's *Undertaking Engagement Guidelines for State Significant Projects*. Reference should be made to **Section 6.1.2** and **Appendix 18** of this EIS.

3. **Traffic and Transport** – Sufficient access and parking arrangements are provided as part of the proposed development, ensuring that there would be no undue impact on the surrounding road network. Reference should be made to **Section 6.1.3** and **Appendix 42** of this EIS.

4. **Noise and Vibration** – The construction and operational noise emissions from the proposed development have been quantified and has assessed noise at the nearest sensitive receivers. Based on the assumptions and inputs of the assessment, it has been established that operation of the Subject Site is capable of complying with relevant EPA and Council noise emission requirements. Reference should be made to **Section 6.1.4** and **Appendix 30** of this EIS.

5. **Air Quality and Odour** – The air quality assessment concludes that the construction phases can be adequately managed so that the short-term and temporary dust related impacts will remain to be low risk. A qualitative assessment of the operational phase was carried out and it was concluded that the impacts of the operation, at residential and industrial/commercial receivers, are likely not to be significant. Reference should be made to **Section 6.1.5** and **Appendix 5** of this EIS.

6. **Water Management** – Water reuse and rainwater harvesting has been considered for the proposed development. The stormwater design of the proposed development is in accordance with Council's stormwater requirements as well as engineering best practice principles, hence it can be ensured that there will be minimal impact on the existing environment as a result of the proposed development. Reference should be made to **Section 6.1.6** and **Appendix 13** of this EIS.

7. **Flooding** – The proposed development has been located and designed in accordance with Council's flood policy and would not result in adverse impacts having regard to flooding and flood safety. Reference should be made to **Section 6.1.7** and **Appendix 22** of this EIS.

8. **Contamination** – The Subject Site has been determined as being suitable for the proposed use, subject to the remediation of the Subject Site in accordance with the Remediation Action Plan (RAP). Reference should be made to **Section 6.1.8** and **Appendices 33** and **36** of this EIS.

9. **Soils** – The proposed development has been designed and will be managed so as to not result in any adverse impacts having regard to soil resources and riparian areas. Reference should be made to **Section 6.1.9** and **Appendix 24**, **37** and **38** of this EIS.

10. **Hazard and Risk** – The storage of DGs has been analysed, and it is concluded that the risks at the Subject Site boundary are not considered to exceed the acceptable risk criteria. Reference should be made to **Section 6.1.10** and **Appendix 35** of this EIS.

11. **Fire and Emergency Services** – The proposed operational access for emergency services personnel has been designed to comply with the *Fire and Rescue NSW fire safety guideline - Access for fire brigade vehicles and firefighters* (V05.01 dated November 2020). Reference should be made to **Section 6.1.11** and **Appendix 21** of this EIS.

12. **Visual** – The proposed development provides a suitable urban design outcome that reflects the existing locality and will not result in any unacceptable visual impact. Reference should be made to **Section 6.1.12** and **Appendix 43** of this EIS.

13. **Waste Management** – Waste Management Plans have been provided, which consider construction and operational waste measures to be undertaken for the proposed development. All buildings have considered the provision for waste management areas to ensure the effective management and disposal of waste can occur. Reference should be made to **Section 6.1.13** and **Appendix 14** and **31** of this EIS.

14. **Infrastructure Requirements** – The proposed development will require the minor augmentation of the existing infrastructure and utilities available to the Subject Site. Reference should be made to **Section 6.1.14** and **Appendix 26** and **28** of this EIS.

15. **Aboriginal Cultural Heritage** – The proposed development will not result in any impacts to Aboriginal Cultural Heritage. Reference should be made to **Section 6.1.15** and **Appendix 2** of this EIS.

16. **Non-Aboriginal Cultural Heritage** - No part of the Subject Site is included on any statutory or non-statutory heritage lists nor are any sites within 1km of the Subject Site. Reference should be made to **Section 6.1.16** of this EIS.

17. **Biodiversity** – The proposal will require the clearing of planted vegetation which has been assessed in accordance with the streamlined module in Appendix D of the Biodiversity Assessment Method. The proposal is considered unlikely to result in any prescribed impacts and the potential for indirect impacts to adversely affect biodiversity values is considered a low risk, providing mitigation measures are implemented. Reference should be made to **Section 6.1.17** and **Appendix 10** of the EIS.

18. **Social** – There are long term, positive social and economic impacts resulting from the project, through the provision of employment and business opportunity in the immediate and broader community. It is considered on balance that the project is worthy of support with respect to social and economic impacts. Reference should be made to **Section 6.1.18** and **Appendix 40** of this EIS.

19. **Ecologically Sustainable Development** – The proposed development has been optimised for energy performance, address key climate related risks, align with the NSW Government's commitment to carbon neutrality by 2025. Reference should be made to **Section 6.1.19** and **Appendix 19** of this EIS.

20. **Planning Agreements/Development Contributions** – The proposed development is subject to State and local development contributions. Voluntary Planning Agreements (VPA) may be sought. Reference should be made to **Section 6.1.20** of this EIS.

JUSTIFICATION FOR THE PROPOSED DEVELOPMENT

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

EIS FINDINGS

The findings of this EIS demonstrate that the proposed development can proceed with consent. All assessed impacts have been examined and deemed acceptable, in relation to all the relevant legislative requirements applicable to the Subject Site. Furthermore, the proposed development aligns with the objectives of the *A Metropolis of Three Cities – Greater Sydney Region Plan,* the *Southern City District Plan* and CBLEP2023.

Based on the findings of this EIS, the Subject Site can successfully support the proposed development, inclusive of related development and operations, with acceptable environmental impacts. The proposed development is a logical addition to the existing Padstow industrial area.

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

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

Given the above reasons and the satisfaction of both of the Objects of the EP&A Act and the aims of CBLEP2023, it is recommended that the proposed development, for the purposes of a chemical manufacturing and associated warehouse and distribution centre, be supported subject to relevant and reasonable conditions.

PART 1 INTRODUCTION

1.1 INTRODUCTION

This EIS has been prepared by Willowtree Planning, on behalf of Selleys (Dulux Group Australia Pty Limited). The EIS is submitted to the NSW DPHI, in support of an application for SSD, for the Gow Street Manufacturing and Warehouse Facility project, involving the refurbishment of a chemical manufacturing facility and associated warehouse or distribution centre at 15 and 20 Gow Street, Padstow (Lot 100 DP1011185 and Lot 53 DP1064349).

The proposal seeks to operate 24 hours per day, seven (7) days per week, and would generate approximately 251 direct construction jobs and a total of approximately 357 operational jobs (as existing) for the proposed facility.

The particulars of this proposal are summarised below:

- Demolition of existing warehouse and maintenance building;
- Remediation of the Subject Site;
- Strip out and refurbishment of existing warehousing space to create a state of the art manufacturing facility with ancillary raw materials storage which will continue to be operated by the Dulux Group and Selleys;
- Construction of external tank storage and tanker unloading area; and
- Remodeling of the existing vehicle access to allow uni-directional truck flow

This EIS describes the Subject Site and proposed development. It also responds to the SEARs and assesses the proposed development in terms of all relevant matters set out in legislation, EPIs and associated planning policies.

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

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

1.2 STATUTORY REQUIREMENTS

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

1.3 MANDATORY CONSIDERATIONS

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

1.4 SUPPORTING PROJECT DOCUMENTATION

Documents provided in support of the proposal are outlined below.

TABLE 1: DOCUMENT SCHEDULE		
Appendix No.	**Document Title**	**Consultant**
Appendix 1	SEARs	-
Appendix 2	Aboriginal Cultural Heritage Assessment	Biosis
Appendix 3	Access Report	Jensen Hughes
Appendix 4	Acid Sulfate Soil Management Plan	Sernversa
Appendix 5	Air Quality Impact Assessment	Northstar
Appendix 6	Arboricultural Impact Assessment	Capability Green Consulting
Appendix 7	Archaeological Report	Biosis
Appendix 8	Architectural Plans	Watson Young
Appendix 9	BCA Assessment Report	Jensen Hughes
Appendix 10	Biodiversity Assessment Report	Ecologique
Appendix 11	Canterbury-Bankstown Development Control Plan 2023 Assessment Table	Willowtree Planning
Appendix 12	Civil Engineering Plans	CostineRoe Consulting
Appendix 13	Civil Engineering Report	CostineRoe Consulting
Appendix 14	Demolition and Construction Waste Management Plan	LG Consult
Appendix 15	Design Report	Watson Young
Appendix 16	Destructive Hazardous Materials Survey Report	Property Risk Australia
Appendix 17	Economic Activity Assessment	HillPDA
Appendix 18	Engagement Report	HillPDA
Appendix 19	Environmentally Sustainable Design Report	DSA Consulting
Appendix 20	Estimated Development Cost Report	Linesight
Appendix 21	Fire Safety Report	Scientific Fire Services
Appendix 22	Flood Impact Assessment	CostineRoe Consulting
Appendix 23	Flood Modelling	CostineRoe Consulting
Appendix 24	Geotechnical Response	PSM
Appendix 25	Historical Archaeological Assessment	Biosis
Appendix 26	Hydraulic and Fire Engineering Services Review	Sparks & Partners
Appendix 27	Hydraulic Services Trade Waste Report	Sparks & Partners
Appendix 28	Infrastructure Services Report	Orion
Appendix 29	Landscape Plans	Geoscapes
Appendix 30	Noise and Vibration Impact Assessment	GHD
Appendix 31	Operational Waste Management Plan	LG Consult
Appendix 32	Plan of Operational Management	Selleys
Appendix 33	Preliminary and Detailed Site Investigation	Senversa
Appendix 34	Preliminary Construction Management Plan	Vaughan Constructions
Appendix 35	Preliminary Hazard Analysis	Salus Risk Consulting
Appendix 36	Remediation Action Plan	Senversa
Appendix 37	Results of Geotechnical Investigation	PSM
Appendix 38	Salinity Management Plan	PSM
Appendix 39	Section J Report	Jensen Hughes
Appendix 40	Social Impact Assessment	HillPDA
Appendix 41	Survey Plan	Frank M Mason & Co

Appendix 42	Transport Impact Assessment	Ason Group
Appendix 43	Visual Impact Assessment	Geoscapes
Whole document	Environmental Impact Statement	Willowtree Planning

1.5 ESTIMATED DEVELOPMENT COST

The EDC of the proposed development, in accordance with the EDC definition under the *Environmental Planning & Assessment Regulation 2021* (EP&A Regulation), is estimated to be $135,565,343.

An Estimated Development Cost Report, prepared by Linesight, is included in **Appendix 20**.

1.6 EMPLOYMENT NUMBERS

The following employment numbers are estimated for the proposal:

1.6.1 Construction Jobs

Based on the EDC and a two-year construction period, the proposed development would generate:

- 151 direct jobs per annum which equals 251 job years; and
- Indirectly support a further 767 jobs elsewhere in NSW.

1.6.2 Operational Jobs

Including the existing operations at the Subject Site, the proposed development would generate:

- 251 full-time equivalent (FTE) jobs on the Subject Site; and
- Indirectly support a 411 jobs elsewhere in NSW.

It is noted that the existing operations cater for 357 jobs which is proposed to remain as existing.

1.7 THE PROPONENT

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

TABLE 2: PROPONENT CONTACT DETAILS	
Company Details	Selleys (Dulux Group Australia Pty Limited) (ABN. 67 000 049 427)
Contact Name	David Hill
Position	Project Manager
Contact Number	0408 258 876
Email Address	david.hill@selleys.com.au

1.8 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

An application requesting project-specific SEARs was submitted to the NSW DPHI (reference: SSD-71052213). The SEARs were subsequently issued by NSW DPHI on the 18 June 2024 and are addressed by this EIS.

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

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

This EIS is also consistent with the minimum requirements for an EIS, as set out in Division 5 of the EP&A Regulation and has considered the *State significant development guidelines – preparing an environmental impact statement*.

PART 2 STRATEGIC CONTEXT

2.1 SITE LOCATION & EXISTING SITE CHARACTERISTICS

The identified portion of land, that is the subject of this EIS is located at 15 and 20 Gow Street, Padstow, being formally described as Lot 100 DP1011185 and Lot 53 DP1064349.

The lots subject to this EIS include:

TABLE 3: SITE DETAILS	
Address	**Lot/DP**
15 Gow Street, Padstow	Lot 100 DP1011185
20 Gow Street, Padstow	Lot 53 DP1064349

The Subject Site is currently occupied by Dulux Group and Selleys and constitutes an area of approximately 6ha. The Subject Site is within the IN1 General Industrial zone pursuant to the CBLEP2023. The Subject Site is located within the Canterbury-Bankstown LGA. At present, 15 Gow Street is occupied by a number of industrial warehouse facilities and administration buildings operated by Dulux Group and Selleys with car parking provided opposite at 20 Gow Street, Padstow, which is owned by Dulux Group.

15 Gow Street is located on the southern side of Gow Street, with 20 Gow Street opposite to the north, between Fairford Road and Salt Pan Creek, Padstow. The Subject Site is located approximately 3.5km from Bankstown, 12km from Liverpool and 20km from Sydney CBD. Access to the road network is from the north of the Subject Site which is within close proximity to the South Western Motorway.

Surrounding land uses in the vicinity of the Subject Site include:

- North – a range of industrial developments zoned IN1 General Industrial and Bankstown STS Substation zoned SP2 Infrastructure;
- East – Salt Pan Creek zoned RE1 Public Recreation and W1 Natural Waterways;
- South – a range of industrial developments zoned IN2 Light Industrial; and
- West - a range of industrial developments zoned IN1 General Industrial.

The location of the Subject Site and the existing development is depicted in **Figures 2** and **3** below.

Figure 2. Cadastral Map (Source: SIX Maps, 2024)

Figure 3. Aerial Map (Source: Nearmap, 2024)

An overview of the site characteristics is included in **TABLE 4**, as follows.

TABLE 4: SITE CHARACTERISTICS	
Component	**Description**
Address and legal description	15 Gow Street, Padstow (Lot 100 DP1011185) 20 Gow Street, Padstow (Lot 53 DP1064349)
Site area	6ha hectares (approx.)
Current use	At present, 15 Gow Street is occupied by a number of industrial warehouse facilities and administration buildings operated by Dulux Group and Selleys with car parking provided opposite at 20 Gow Street, Padstow, which is owned by Dulux Group.
Topography	The Subject Site generally grades from the west to the east towards Salt Pan Creek from approximately 10m to 6 ASL.
Access	The Subject Site currently obtains vehicle access from Gow Street with multiple entry points for cars and service vehicles.

TABLE 4: SITE CHARACTERISTICS	
Component	**Description**
Vegetation	Sparse vegetation and landscaping currently exists across the Subject Site owing to the historical industrial usage.
Watercourses	No watercourses run through the Subject Site. Salt Pan Creek is the closest watercourse which is located immediately to the east of the Subject Site.
Wetlands	No mapped local or important wetlands occur within the Subject Site. Salt Pan Creek is identified as a coastland wetland and is located immediately to the east of the Subject Site.
Biodiversity	No areas of outstanding biodiversity value lie within the study area.
Easements and encumbrances	The Subject Site is burdened by a number of easements and encumbrances. Further details are included in **Section 2.4** of this EIS.
Heritage	The Subject Site does not comprise of any Items of Heritage Significance.

2.2 DEVELOPMENT HISTORY

The Subject Site is subject to several approvals and development applications as shown below.

TABLE 5. PREVIOUS APPLICATIONS			
DA Reference	**Development Description**	**Date**	**Determination**
15 Gow Street			
DA-79/2001	Demolition of resins manufacturing building	23/01/2001	Approved
DA-407/2001	Removal of floor slabs, footings and underground storage tanks	27/03/2001	Approved
DA-666/2001	Internal office fitout	14/05/2001	Approved
CD-166/2002	Alarm signaling system	30/04/2002	Approved
DA-935/2003	Demolition to ground floor slab level of vacant 'Gelcoats' building and adjacent pipe bridges, switchrooms and substation transformer	19/06/2003	Approved
DA-1371/2003	Construction of a new electrical switchroom within existing paint mill building	04/09/2003	Approved
DA-1731/2003	Construction of a new asphalt car park, landscaping, reconstruction of internal roads, alterations to existing entry, installation of stormwater drainage system and removal of three underground storage tanks	06/11/2003	Approved
DA-581/2006	Installation of 18 groundwater monitoring wells and drilling of 60 boreholes for collection of soil samples	07/06/2006	Approved
DA-251/2007	Refurbishment to existing office including associated signage	26/03/2007	Approved
DA-903/2007	Remove and replace underground solvent storage tanks	26/09/2007	Approved

DA-566/2010	Construction of a greenhouse structure for the testing and prototyping of Yates products	16/06/2010	Approved
DA-804/2011	Stormwater management work including addition of a first flush system to an existing external concrete slab to prevent contaminated stormwater entering Salt Pan Creek	13/09/2011	Approved
DA-1068/2011	Modifications to an existing stormwater network so that it may operate as a first flush containment system	09/12/2011	Approved
DA-804/2011/1	Stormwater management work including addition of a first flush system to an existing external concrete slab to prevent contaminated stormwater entering Salt Pan Creek – S96(1A) Amendment	02/10/2012	Approved
DA-566/2010	Construction of a greenhouse structure for the testing and prototyping of Yates products – S96(1A) Amendment: Re-size and re-location the green house	09/10/2012	Approved
DA-464/2013	Erection of a deck and shade sail	14/06/2013	Approved
DA-809/2013	Demolition of existing building	27/09/2013	Approved
DA-689/2015	Installation of two groundwater monitoring wells in the Salt Pan Creek Park area	24/06/2015	Refused
20 Gow Street			
None applicable			

The proposed development seeks to obtain consent for all operations to be undertaken at the Subject Site.

2.3 LAND OWNERSHIP

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

TABLE 6: REGISTERED LAND OWNERS	
Lot/DP	**Registered Land Owner**
Lot 100 DP1011185 15 Gow Street, Padstow	Dulux Group (Australia) Pty Ltd
Lot 53 DP1064349 20 Gow Street, Padstow	Dulux Group (Australia) Pty Ltd

Land owners consent has been obtained from all entities.

2.4 EASEMENTS AND ENCUMBRANCES

The encumbrances noted within the Certificate of Title and Title Diagram of lots described in **Section 2.3** above are summarised in **TABLE 7**. The proposed development does not seek to alter any existing easements or encumbrances.

TABLE 7: ENCUMBRANCES ON TITLE	
Reference	**Description and Location**
Lot 100 DP1011185	
-	*Land excludes minerals and is subject to reservations and conditions in favour of the crown of part formerly in 1/651246 – see Crown Grant(s)*
-	*Land excludes minerals (S.536AA Local Government Act, 1919) of part formerly in 1/510250*
H984652	*Easement for transmission line variable width (c) affecting the part(s) shown so burdened in the title diagram*
Z944756	*Transfer of easement to Sydney Electricity*
Q337300	*Easement for electricity purposes of 7 metre(s) wide and variable affecting the part(s) shown so burdened in the title diagram*
Q456487	*Easement for transmission line variable width affecting the part(s) shown so burdened in the title diagram*
Z944756	*Transfer of easement to Sydney Electricity*
R149517	*Easement for electricity purposes 3 wide (d) and 7 metre(s) wide and variable (e) affecting the part(s) shown so burdened in the title diagram*
T906628	*Easement to drain water 3 wide (l) affecting the part of the land above described shown so burdened in the title diagram*
V25476	*Covenant affecting the part shown so burdened in the title diagram*
Z404962	*Lease to the Sydney County Council of substation premises No.3050 together with right of way and easement for electricity purposes as shown in plan with I870706. Expires 31.12.2039*
AK971351	*Lease of Lease Z404962 to Blue Asset Partner Pty Ltd, Eric Alpha Asset Corporation 1 Pty Ltd, Eric Alpha Asset Corporation 2 Pty Ltd, Eric Alpha Asset Corporation 3 Pty Ltd & Eric Alpha Asset Corporation 4 Pty Ltd expires: see dealing. Clause 2.3 (b) (ii)*
AK971352	*Lease of Lease AK971351 to Blue Op Partner Pty Ltd, Eric Alpha Operator Corporation 1 Pty Ltd, Eric Alpha Operator Corporation 2 Pty Ltd, Eric Alpha Operator Corporation 3 Pty Ltd & Eric Alpha Operator Corporation 4 Pty Ltd Expires: see dealing. Clause 12.1*
AK971502	*Mortgage of Lease AK971351 to ANZ Fiduciary Services Pty Ltd*
AK971571	*Change of name affecting Lease Z404962 Lessee now Alpha Distribution Ministerial Holding Corporation*
DP648716	*Easement to drain water 2 wide (l) & (M) affecting the part shown so burdened in the title diagram*
DP648716	*Easement to drain water 2 wide appurtenant to LOT B in DP361227*
DP1103614	*Right of carriageway affecting the part(s) shown so burdened in DP1103614*
DP1103614	*Easement for electricity purposes affecting the part(s) shown so burdened in DP1103614*
Lot 53 DP1064349	
DP1064349	*Easement for drainage 1.83 and 5 metre(s) wide affecting the part(s) shown son burdened in the title diagram*
DP1064349	*Easement for drainage 1.83 and 5 metre(s) wide appurtenant to the land above described.*

2.5 SITE CONTEXT

The Subject Site is located within the suburb of Padstow which forms part of the Canterbury-Bankstown LGA. The Subject Site forms part of the existing Padstow Industrial area.

The surrounding context exhibits a wide range of industrial uses which are bisected by Fairfield Road and South Western Motorway. The closest residential development is located approximately 340m to the west of the Subject Site.

Salt Pan Creek adjoins the Subject Site to the east which forms part of the greater Salt Pan Creek Wetlands to the south. A number of recreational areas such as bowling greens, tennis courts and a baseball field adjoin the creek.

A visual aerial representation of the surrounding land is included in **Figure 1**. **Figures 4** to **7** demonstrate the context of the current Subject Site conditions when viewed from each street frontage.

Figure 4. View of the Southern Portion of the Subject Site Looking South East (Source: Geoscapes, 2024)

Figure 5. View of the Southern Portion of the Subject Site Looking South West (Source: Geoscapes, 2024)

Figure 6. View of the Southern Portion of the Subject Site Looking West (Source: Geoscapes, 2024)

Figure 7. View of the Northern Portion of the Subject Site Looking North (Source: Geoscapes, 2024)

2.5.1 Relevant Future Projects

The following relevant future projects have been identified within close proximity of the Subject Site.

TABLE 8: RELEVANT FUTURE PROJECTS	
Category	**Project Description**
Approved projects	▪ SSD-10450 granted consent on 25 May 2023 for the Padstow Resource Recovery Facility at 81-87 Gow Street, Padstow; and ▪ SSD-52861709 granted consent on 18 August 2024 for the Gow Street Multi-Level Warehouse Facility at 91-116 Gow Street, Padstow.

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

2.6 STRATEGIC PLANNING CONTEXT

2.6.1 Greater Sydney Region Plan – A Metropolis of Three Cities

The *Greater Sydney Region Plan – A Metropolis of Three Cities* divides the Sydney Region into three (3) Cities, with a vision of growth until 2056. The Plan aims to anticipate the housing and employment needs of a growing and vastly changing population. The overall vision pursues an objective of transforming 'Greater Sydney' into a Metropolis of Three Cities, including:

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

The division into three (3) cities puts workers and the wider community closer to an array of characteristics such as, intensive jobs, 'city-scale' infrastructure and services, entertainment and cultural facilities. By managing and retaining industrial land close to city centres and transport, this will ensure critical and essential services are readily available to support local businesses and community members and residents. Once constructed and operational, the Subject Site would achieve economic growth and prosperity, as well as encourage employment-generating opportunities within an area zoned for such permissible purposes, that is considered relatively close in conjunction to residential communities,

providing an ease of commute. The proposed development across the Subject Site considers the employment-generating outcomes that can be achieved for the immediate and wider localities.

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

- Infrastructure and Collaboration – The proposed development of the Subject Site for the purposes of a chemical manufacturing facility and associated warehouse and distribution facility would facilitate the provision of services to support the wider locality and region;
- Liveability – The proposed development encourages employment-generating opportunities and economic prosperity, which has positive influences on the wider locality;
- Productivity – The proposed development is situated within the *Southern City District Plan* (refer to **Section 2.6.2** below); and,
- Sustainability – The proposed development would not exhibit or emit any detrimental impacts to its wider ecological surroundings.

In summary, the Subject Site and proposed development contributes to the objectives set out in the *Greater Sydney Region Plan – A Metropolis of Three Cities* through the further promotion of technological advancements and employment-generating opportunities to the wider locality and community with minimal environmental impacts, positioned within the Canterbury-Bankstown LGA.

2.6.2 Our Greater Sydney 2056: South District Plan

The Subject Site forms part of the South District, as identified in **Figure** below and is subject to the provisions of the *South District Plan*.

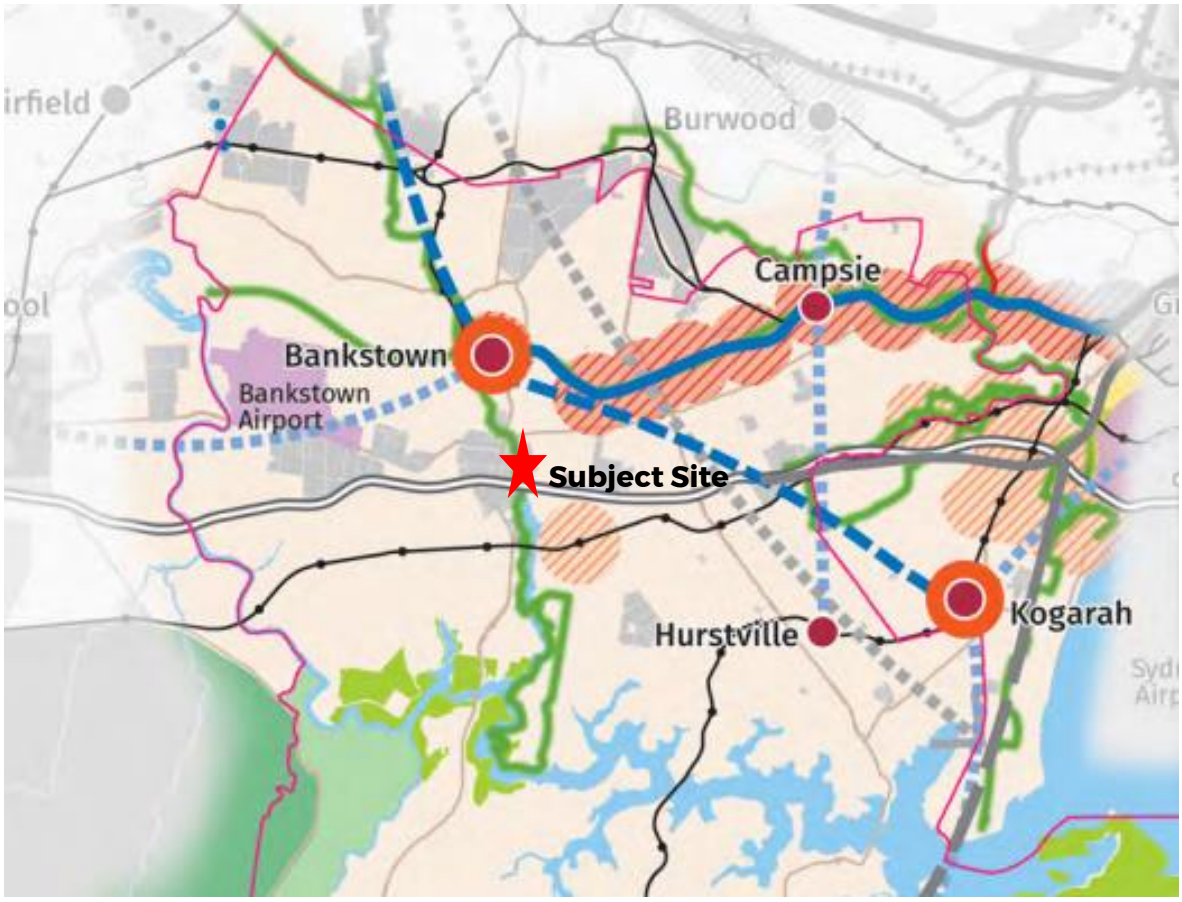


Figure 8. South District Plan Structure Plan (Source: GSC, 2020)

The South District Plan covers the Canterbury-Bankstown LGA in which the Subject Site is located. The Plan sets out a twenty-year vision to help achieve the goals contained in A Metropolis of Three Cities – the Greater Sydney Commission (GSC) vision for developing Sydney as a world-class future city. The Plan agglomerates City, Regional and Local planning. The Subject Site is situated within the South District, which falls within the Eastern Harbour City.

The South District Plan reinforces the four (4) planning priorities of the GSC. The Plan establishes a number of priorities and actions to guide growth, development and change. It also emphasises connectivity to infrastructure, collaboration, liveability, productivity and sustainability. The GSC's mission statement further reinforces the Plan's concentrated aims by outlining its main strategies, namely:

The proposed development, would contribute to the objectives set out in the South District Plan (of which the Subject Site forms a part), by promoting a greater range of land uses of benefit to the community, including the proposed development and other associated land uses; facilitating the provision of greater and improved infrastructure; and promoting additional employment-generating opportunities, to the wider locality and community closer to home, whilst supporting economically and environmentally-sustainable development. These aims are specifically relevant to the proposed development.

2.6.3 Connective City 2036

The Connective City 2036 is Local Strategic Planning Statement for the Canterbury-Bankstown LGA and is the vision established by Council which establishes land use directions and sets priorities to demonstrate why and how infrastructure can be arranged and how the LGA relates to neighbouring LGAs and to Greater Sydney as a whole.

The proposed development will generally align with the vision established in Connective City 2036 in that it:

- Retains and manages key industrial lands;
- Supports job creation, choice and diversity; and
- Will attract investment in research and technology.

2.6.4 Future Transport Strategy 2056

The *Future Transport Strategy 2056* is a 40 year strategy, supported by plans for regional NSW and for Greater Sydney. The strategy and plans focus on the role of transport in delivering movement and place outcomes that support the character of the places and communities that are desired for the future.

The proposed development aligns with the strategies of the *Future Transport Strategy 2056* on the following basis:

- The Subject Site has access to regular public transport services along Fairford Road;
- The parking provision is appropriate;
- Access, servicing and internal layout will be provided in accordance with Australian Standards AS2890.1-2004 and AS2890.2-2018; and
- The surrounding road network and intersections will be able to cater for the proposed development traffic.

2.7 SITE SUITABILITY

The Subject Site is located within an evolving industrial precinct and is zoned IN1 General Industrial under CBLEP2023. The proposed development would facilitate the intended use of the Subject Site for industrial purposes, which is consistent with the zoning and the surrounding context.

The proposed development falls within the definition of 'general industries' and 'warehouse or distribution centre' which are permissible with consent in the IN1 General Industrial zone, pursuant to Part 2 of CBLEP2023.

The Subject Site is suitable for the size and scale of the development proposed and represents a quality outcome to facilitate an industrial development that is commensurate to the surrounding area and its existing built form.

In summary, the Subject Site is highly suited to accommodate the intended development based on the following factors:

- CBLEP2023 allows for the proposed development as a permissible use;
- The Subject Site is readily accessible via the regional road network;
- The proposed development is compatible with surrounding development and local context;
- The Subject Site can be serviced immediately and at no cost to Government;
- The proposed development causes minimal impact on the environment;
- The proposed built form is designed to mitigate any impacts on surrounding properties; and
- The proposed development is consistent with strategic intent of the area.

The following key elements of the Subject Site and proposed development are noted:

2.7.1 Visual Impact

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

Refer to Section **6.1.12** of this EIS.

2.7.2 Infrastructure

The Subject Site is suitably located with access to infrastructure and utility services – refer to **Section 6.1.14** of this EIS.

2.7.3 Transport and Traffic

The Subject Site is well connected to existing road connections and public transport. The SIDRA analysis undertaken has found that surrounding intersections would continue to operate at the same level of service as a result of the proposed development.

Refer to **Section 6.1.3** of this EIS for further information.

2.7.4 Cultural Heritage

No Aboriginal sites, objects or areas of archaeological potential exist within the boundaries of the Subject Site. The Subject Site is located within an area that has been subject to extensive historic development and environmental modifications, is not identified as a Heritage Item or located within a Heritage Conservation Area.

Reference should be made to **Section 6.1.15** and **6.1.16** of this EIS for further detail.

2.7.5 Stormwater and Flooding

The hydrological assessment shows that the local post development flows from the Subject Site will be consistent with pre-development flows and demonstrates that the Subject Site discharge will not adversely affect any land, drainage systems or watercourse as a result of the development.

The proposed development has been located and design in accordance with Council's flood policy and would not result in adverse impacts having regard to flooding and flood safety.

Reference should be made to **Section 6.1.6** and **6.1.7** of this EIS for further detail.

2.7.6 Summary of Site Suitability

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

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

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

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

PART 3 PROJECT DESCRIPTION

3.1 OBJECTIVES OF THE PROPOSAL

The subject proposal seeks development consent for a chemical manufacturing facility and associated warehouse or distribution centre. The following objectives have been identified as forming the basis of the proposed development, as well as being consistent with the aims set out within CBLEP2023, including:

- Create a state of the art manufacturing facility, securing the long term viability of operations in NSW;
- Design the Subject Site to achieve continued economic return;
- Ensure minimal environmental and amenity impact;
- Ensure ongoing compliance with all operational legislative requirements;
- Provide for an employment-generating land use; and
- Ensure development is compatible with surrounding development and both the local and regional context.

3.2 PROJECT OVERVIEW

Development consent is sought for the refurbishment of a chemical manufacturing facility and associate warehouse and distribution centre, pertaining to the following scope of works:

- Demolition of existing warehouse and maintenance building;
- Remediation of the Subject Site;
- Strip out and refurbishment of existing warehousing space to create a state of the art manufacturing facility with ancillary raw materials storage which will continue to be operated by the Dulux Group and Selleys;
- Construction of external tank storage and tanker unloading area; and
- Remodeling of the existing vehicle access to allow uni-directional truck flow.

Consent is sought to develop the Subject Site in accordance with the following provisions.

TABLE 9: PROPOSED DEVELOPMENT PARTICULARS

Project Element	Development Particular
Site Area	60,171m^2
Gross Floor Area	28,918m^2
Floor Space Ratio	0.48:1
Building Height	16.4m
Number of Storeys	Three (3)
Hardstand	112,364m^2
Tree Removal	15 trees
Canopy Cover	33 trees proposed
Landscaping	6,803m^2
Site Coverage	44.95%
Car Parking	223 parking spaces
Bicycle Parking	Nine (9)
Estimated Development Cost	$135,565,343 (including GST)
Construction Jobs	251

Operational Jobs (as existing)	357
Operational Capacity (maximum)	41.1 million filled product units per annum

3.3 DEVELOPMENT DESCRIPTION

3.3.1 Project Area

The project area as assessed for SSD-71052213 is identified as 15 and 20 Gow Street, Padstow which encompasses Lot 100 DP1011185 and Lot 53 DP1064349. It is noted that no works are proposed in 20 Gow Street. The site area is 60,171m^2 which attributes to the full surveyed area of both lots.

3.3.2 Physical Layout and Design

3.3.2.1 Site Preparation Works

Site preparation works are required to facilitate a suitable development platform for the proposed development; such works are described in **TABLE 9**.

TABLE 10: SITE PREPARATION REQUIREMENTS	
Project Element	**Proposed Works**
Demolition works	The proposal involves demolition of a number structures on the Subject Site. As demolition plan is included within **Appendix 8** of this EIS.
Tree removal	The proposal involves the removal of 15 trees. An Arboricultural Impact Assessment Report is included within **Appendix 2** of this EIS.
Earthworks	The following earthworks will be required to facilitate the proposed development: Cut: 5,500m^3 Fill: 5,100m^3 Detailed Excavation: 5,400m^3 Balance: -5,800m^3 Detailed Civil Plans are included within **Appendix 12** of this EIS.

3.3.2.2 Built Form

The proposed development has been designed to achieve a high quality architectural response which is of a consistent form and scale with the surrounding industrial development and meet the operational demands of the proposed development.

The proposed design responds to the setting of the area by providing a high-quality industrial facility which is proposed as an upgrade to the existing site, improving the overall look of Gow Street with a carefully articulated building facade, that respects the existing office buildings, giving a more human scale to the street, whilst at the same time considering access and the visual and acoustic impacts on the nearby properties.

The street façade maintains the existing two-story office buildings to address the bulk and scale of the new industrial building that will provide a high quality façade as the background. The main façade on Gow Street will be improved with the demolition of an old existing canteen building to be replaced with a new truck exit and landscape area.

Complete Architectural Plans are provided in **Appendix 8**, excerpts of which are provided below for reference.

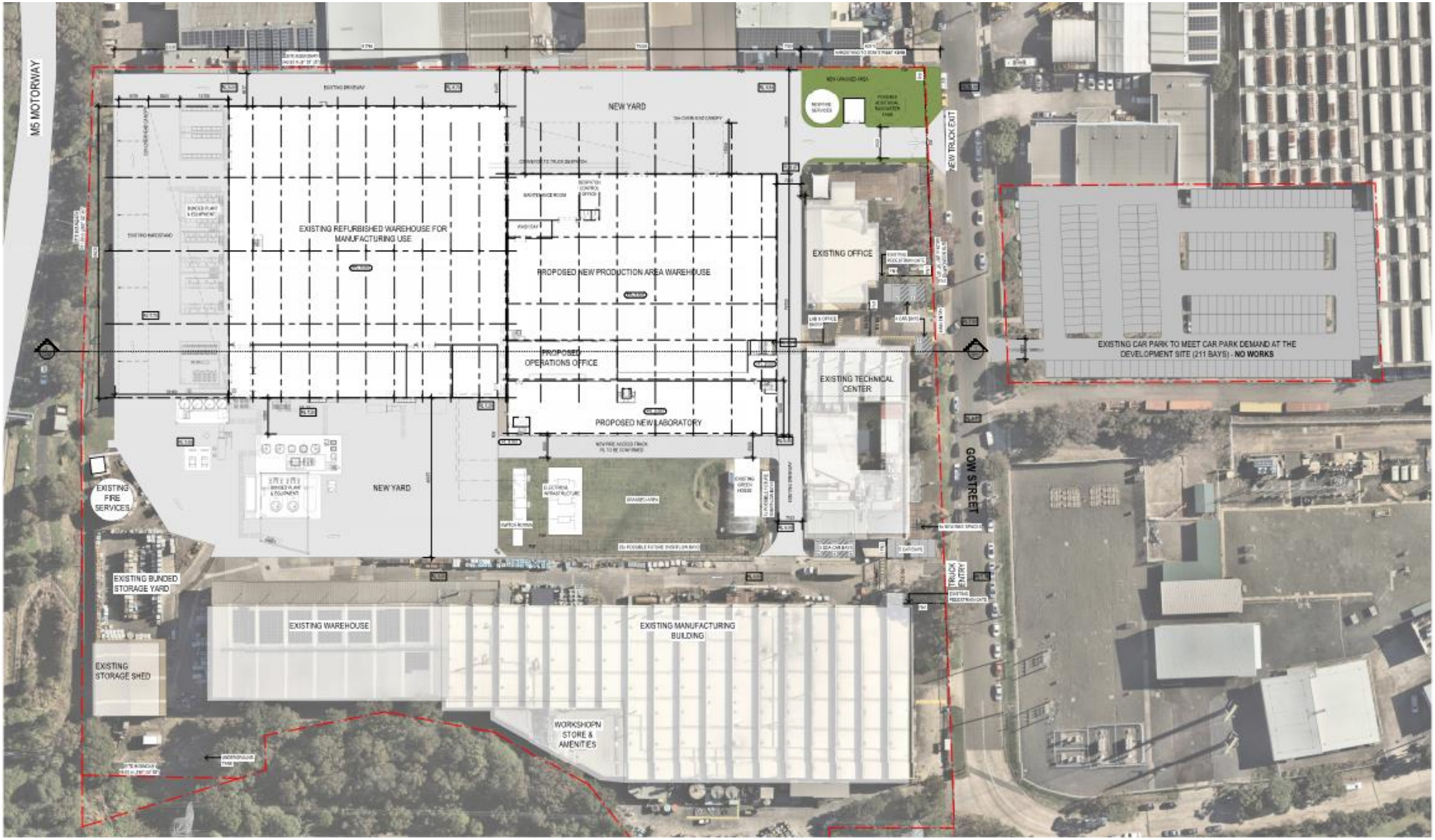


Figure 9. Proposed Site Plan (Source: Watson Young, 2024)

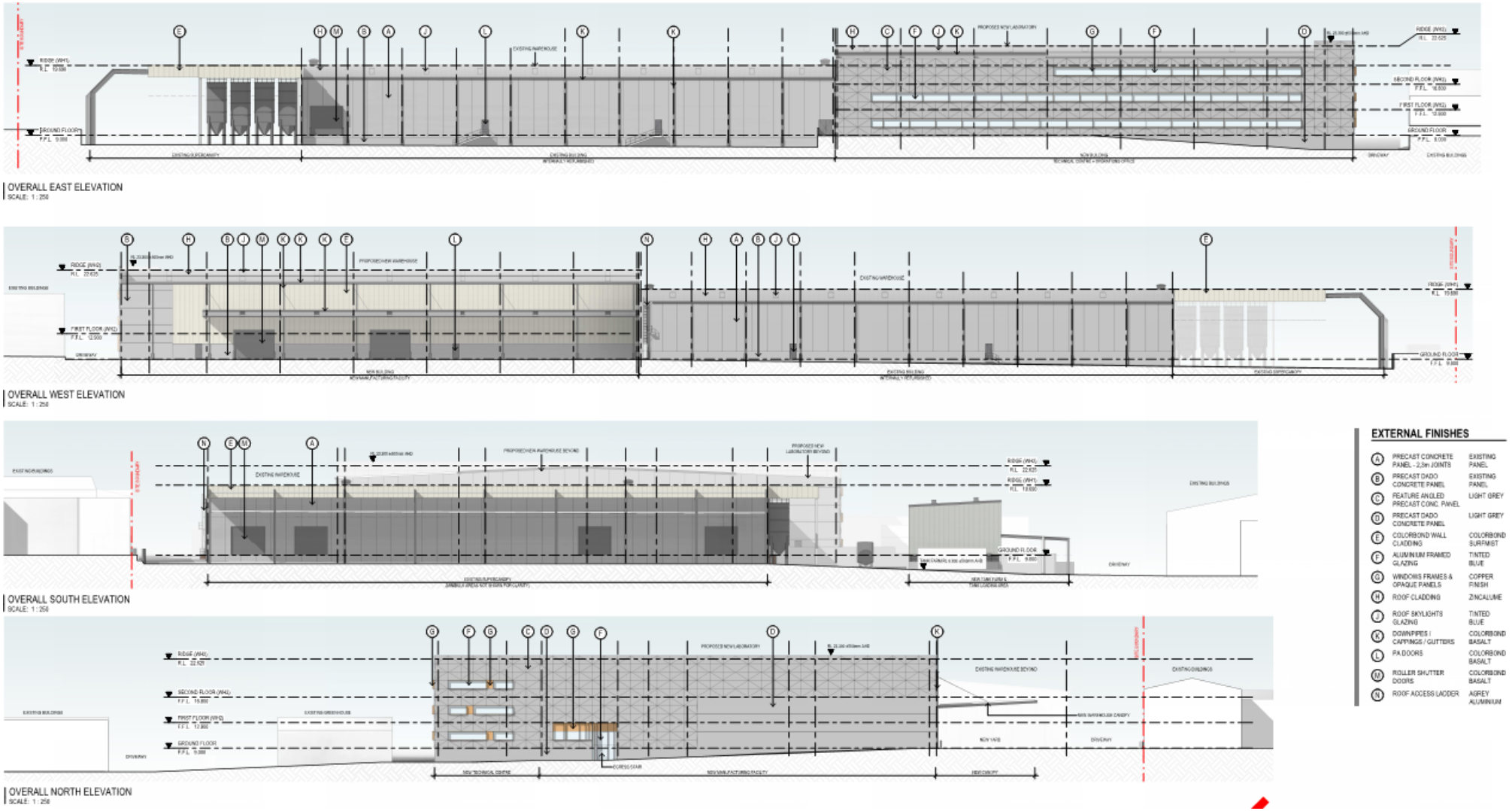


Figure 10. Proposed Elevations (Source: Watson Young, 2024)

Figure 11. Building Perspective Drawing (Source: Watson Young, 2024)

3.3.3 Use and Activities

The Subject Site is home to both Selleys manufacturing and corporate functions of Dulux Group. It is the global headquarters of Selleys and Yates and the NSW corporate base for Dulux, Cabots and other businesses part of Dulux Group. There is a mix of onsite, hybrid and remotely based workers.

The Selleys operational team undertake manufacture of Sealants, Adhesives & Fillers (SAF) and Household Cleaning products. Research and development activities on-site include formulation development and scale-up to full sized manufacturing capability. Additionally, Selleys corporate groups are based within the existing office space.

The existing Selleys factory was constructed in 1964 and over the course of 60 years has seen a significant increase in production throughput and operational complexity. This growth has been catered for somewhat haphazardly. As a result, the flow is particularly poor both in terms of vehicle movements on-site and workflow within the existing factory. The existing manufacturing plant produces 270 products totaling over 21 million units a year, across a range of products. The majority of these are Sealants, Adhesives and Fillers (SAF) for 'DIY' consumers and household cleaning products for grocery channels. Major brands include No More Gaps, Liquid Nails, Spakfilla and Sugar Soap. A broad range of chemical technologies are processed, including acrylic (water-based), solvent-based, silicone and the latest generation of hybrid/MS polymer. A number of the existing buildings on the Subject Site are proposed to remain as existing (including operation) including the following and as depicted in **Figure 9** above:

- The existing office, technical centre and greenhouse at the north of Subject Site; and
- The existing manufacturing building, workshop, store and amenities, warehouse, storage shed and bunded storage yard at the east of the Subject Site.

These buildings will generally be unaffected by the demolition and construction of the proposed development and will continue to remain operational (where possible) during this period. The operation of these buildings will generally remain as existing once the proposed development becomes operational.

The general production process combines solid and liquid raw materials in one (1) of 27 mixing vessels to produce a thick paste. Fine control of dispersion, temperature, aeration, moisture and biocontamination is required. High volume materials are stored in bulk tanks (and delivered by tanker), but the majority are handled in 200L drums or 25kg bags (and delivered by regular trucks). Product is packaged on 16 filling lines into cartridges, sausages, tubs, tubes and bottles.

The existing factory has served the business well but is outdated and unable to effectively produce modern product technologies or meet future capacity and sustainability requirements. The proposed factory will be highly automated and deliver a step-change in safety, quality and efficiency with significantly less waste. The majority of Padstow production will move into the new facility. Solvent-based production will remain in the existing factory but is expected to transition to more sustainable technologies in the future, at which point it will also be produced in the new factory.

All vehicles (with the exception of some maintenance activities) enter through the main entrance on Gow Street and then travel to varying parts of the Subject Site before exiting through the same route to Gow Street.

The Subject Site currently runs a 24/5 shift pattern to meet customer demands, with weekend overtime to meet peak demand. The majority of Truck movements are during the day shift of 6.00am to 5.00pm. There is no intention for B-doubles to be part of the logistics process on-site at this point and turning circles etc. will be based on single trailer units. The proposed development will allow vehicles to enter the Subject Site via a dedicated entrance (existing but limited use) and deliver/collect from either the existing operational facility or to the proposed manufacturing facility before exiting via a proposed exit to Gow Street.

Incoming raw materials for the proposed facility will be received at the south of the new manufacturing facility. Inbound packaging materials and outbound finished products will be (un)loaded at the north western end of the new facility. Three (3) to five (5) outbound truck movements for finished products are expected per day. It is noted that the existing warehouse will continue to serve the existing factory operations only. Vehicles serving this warehouse will enter via the proposed entrance and exit via Gow Street.

The proposed laboratory will provide space to enable the researchers at Selleys to development new and improved products for manufacturing in conjunction with the manufacturing and marketing teams located at the Subject Site prior to full scale production at the Subject Site. Co-location of this component is critical to allow for improved efficiencies through communication and knowledge share.

TABLE 11 below provides a summary of the proposed operational details, with **Figures 12** to **13** illustrating the operational processes and movements of the proposed development.

TABLE 11. OPERATIONAL DETAILS	
Component	**Proposed Operations**
Hours of operation	24 hours, seven (7) days a week
Number of staff	Up to 357 (120 manufacturing and 237 administrative) staff with a maximum of 180 staff at any time

A typical batch consists of the following steps:

- Add Liquid Group 1;
- Add Powder Group 1;
- Disperse under Vacuum;
- Hold at Temperature;
- Add Powder Group 2;
- Add Liquid Group 2;
- Mix and Cool;
- QC Check; and
- Discharge.

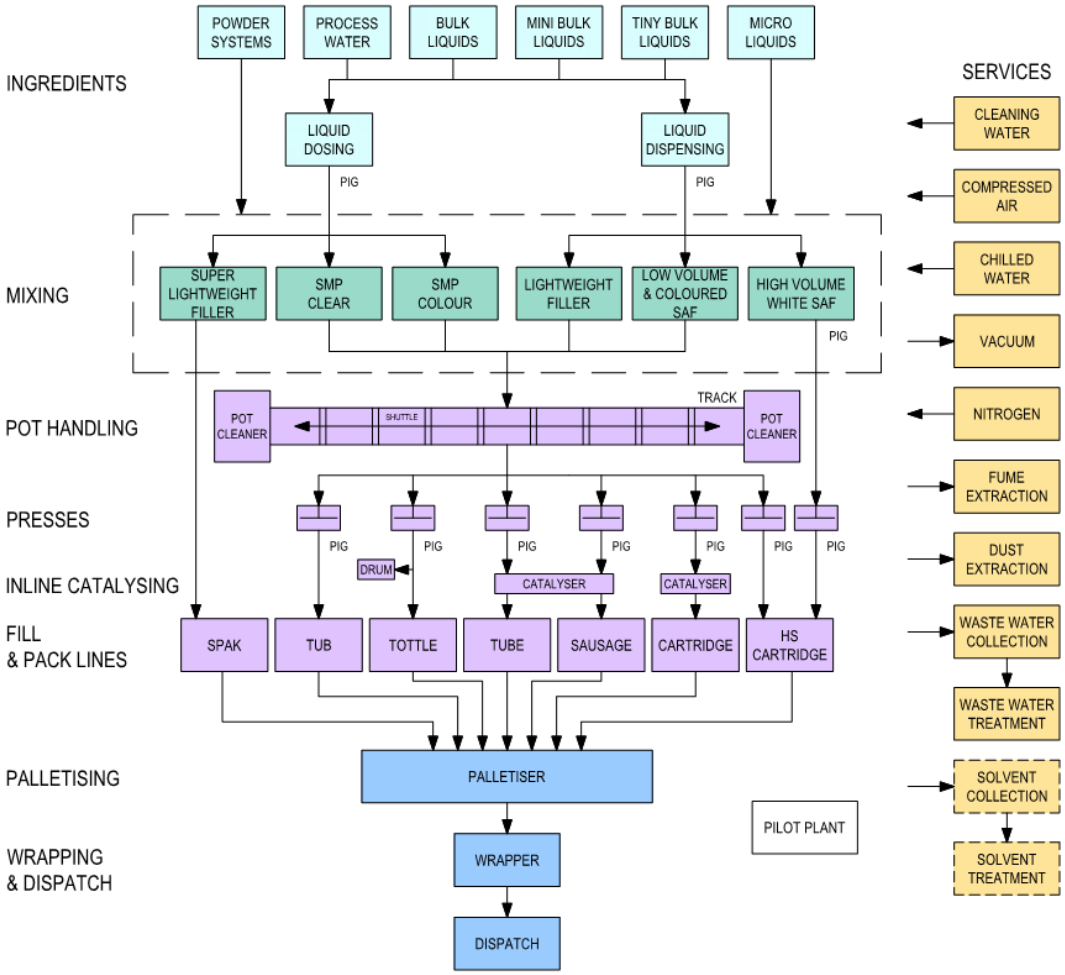


Figure 12. Operational Flow Chart (Source: Selleys, 2024)

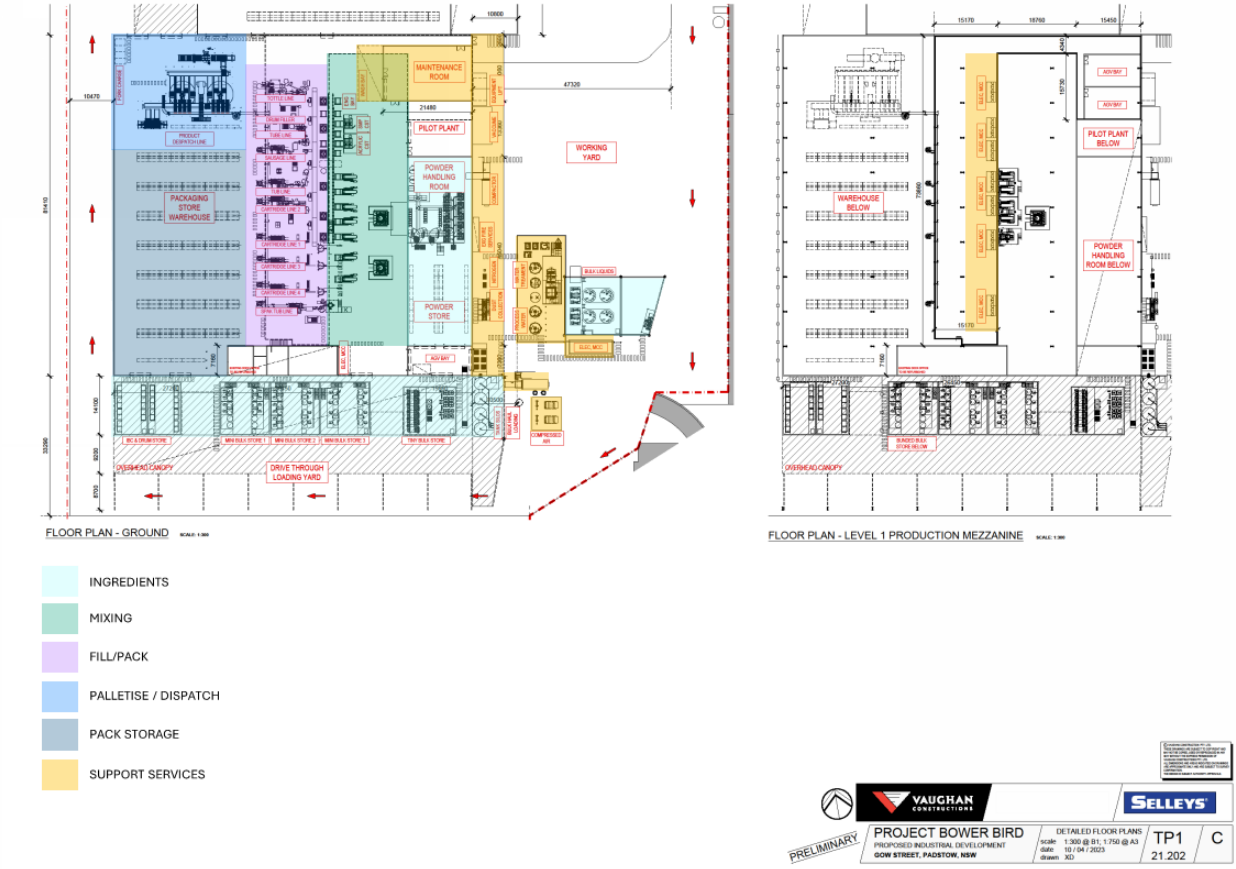


Figure 13. Operational Layout (Source: Vaughan Constructions, 2024)

Ingredients:

Liquid Chemicals

The chemicals used to formulate a batch will be transferred from different liquid systems, comprising:

- Bulk Liquids;
- Mini Bulk Liquids;
- Tiny Bulk Liquids; and
- Micro Liquids.

Bulk liquids are supplied to the Subject Site from road tankers. Intermediate bulk containers (IBCs), drums, and miscellaneous packages are used to supply the Minibulk, Tinybulk and Micro Liquid storage vessels. Minibulk and Tinybulk vessels are stored under the canopy with the exception of flammable liquids which are stored in the existing DG compound. Micro Liquid vessels are stored inside the factory close to the production mixer and dispersers.

Bulk Liquids

These liquids will be stored in four (4) x 50kL Vessels. Bulk liquids are delivered to the Subject Site by semi-trailer road tankers with a capacity of approximately 25,000L. From the tanker it will be unloaded at a rate of 25,000kg/hr (≈7kg/sec).

Tankers will have a drive through unloading station on the Subject Site that will be bunded and roofed to mitigate rainwater filling up the bund. There will be an unloading station with a valve manifold to fill

either one (1) of the four (4) tanks. After unloading, the line will be flushed with biocide process water and drained to minimise cross contamination.

When transferring the bulk liquids to a batch it can be transferred directly to the dispersers/mixers via flowmeters, or via a Dispensing Head/Cocktail tank and pigged or via totem poles and pigged. Filters and strainers will be used to minimise unwanted solids/contaminants being transferred through to the mixer and dispersers.

Mini Bulk Liquids

These liquids are contained in 21 x 1500L vessels which are gravity fed by a 1,000L IBC stationed above each vessel that are stationed and removed by forklift.

Some vessels require heating, nitrogen gas atmosphere, humid atmosphere, and agitation. Some Minibulks have the following DG ratings: Corrosive Class 8, Misc DG Class 9, Combustible. When transferring the Minibulk liquids to a batch it will be pumped to the dispersers/mixers via a Dispensing Head/Cocktail tank and pigged or via totem poles and pigged. Minibulk transfers will be performed by air operated diaphragm pumps. Filters and strainers will be used to minimise unwanted solids/contaminants being transferred through to the mixer and dispersers.

Tiny Bulk Liquids

These liquids will be contained in 24 x 250L and 12 x 500L vessels which are manually filled.

Some vessels require heating, nitrogen gas atmosphere, humid atmosphere, and agitation. Some Tinybulks have the following DG ratings: Flammable Class 3, Corrosive Class 8, Misc DG Class 9, Combustible. When transferring the Tinybulk liquids to a batch it will be pumped to the dispersers/mixers via a Dispensing Head/Cocktail tank and pigged or via totem poles and pigged. Tiny bulk liquids will be transferred by air operated diaphragm pumps. Filters and strainers will be used to minimise unwanted solids / contaminants being transferred through to the mixer and dispersers.

Micro Liquids

These liquids will be contained in one (1) x 5L vessel and two (2) x 10L vessels which are manually topped up. The liquid additions are small at around 40g-500g additions and will be transferred via a peristaltic pump with a flow meter for accurate dosing.

Powders

For powder additions there are different transfer options depending on the type and quantity of powder. Each Disperser/Mixer will have one (1) or two (2) Batch Bins above to prebatch and meter the powders in as required. Each Disperser/Mixer will also have a manual port to add small boutique additions including powder tinters.

The powder system will comprise of:

- Bulk powders which will be transferred directly from a silo to the batch bins above dispersers. Silos are filled from bulk powder tankers;
- Bulk bag vacuum delivery via dedicated stations for SPAK;
- Mobile bin collection/docking system that collects powders from delivery stations and moves to docking stations to pneumatically transfer powders to the batch bins above dispersers. The mobile bins are filled from:
    - Bulk Bag unloaders;
    - Dispensary powders which are manually weighed and hand tipped;

- Small bag dispensary for small quantities including tinters and hazardous powders; and
- Driers for specified SMP powders.

Process Water

Process Water will be used as product addition and for flushing product-based pigging. Process Water is required to be cold and biocides free. As a result, ozone/UV will be employed to maintain the biological integrity of the system.

Ozone gas is injected into the Tank to keep the stored water sterile. The ozone in the supply piping is destroyed by 254nm UV light at a suitable UV dose before users so the water is fresh and ozone free. At night the UV lamps are turned off and the piping supply loops are sanitised by circulating ozone water throughout.

The plant will produce the following Finished Goods formats:

- Cartridges;
- Sausages;
- Tubes;
- Tottles;
- Round Tubs;
- Spakfilla Tubs; and
- 200L Drums.

The relationship between Make and Fill is shown in **Figure 14** below.

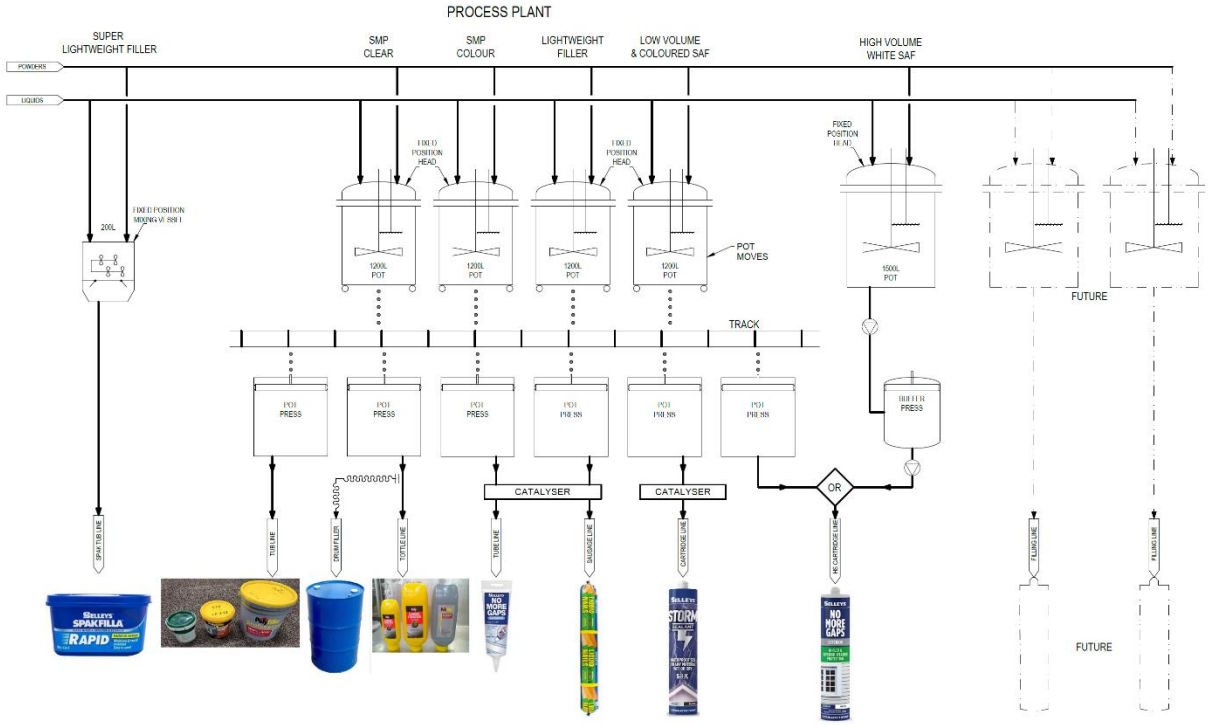


Figure 14. Relationship Between Making and Filling (Source: Selleys, 2024)

Mixing Vessels

Six (6) Mixing Vessels are used to combine chemical raw materials and produce the bulk that is filled into the Finished Goods containers. These vessels can provide a combination of high shear dispersion and low shear agitation and are fitted with sensors (eg, pressure, temperature) and services (eg, nitrogen, vacuum and cooling water) to achieve fine control over the production process.

The Mixing Vessels produce:

- HV White SAF, such as: No More Gaps;
- LV Coloured SAF, such as: Liquid Nails Fast;
- Light Weight Fillers, such as: Large Cracks;
- SMP Colours, such as: MarineFlex Black;
- SMP Clear, such as: Storm Clear; and
- Super Lightweight Fillers, such as Spakfilla Rapid.

Product Transfer to Filling

SMP Clear, SMP Colour, Light Weight Fillers and Low volume/Coloured SAF are prepared in 1,200L pots and automatically transported on a track (Mobile Pot) system to fixed Presses for filling. Product from any of the four (4) Dispersers can be filled on any of the six (6) filling lines on the Mobile Pot System. The Mobile Pot System automatically manages all pot movements between Dispersers, Platten Placing Station (the plastic plattens seal the product), Fixed Presses that engage with the platten to press out the product, cleaning stations, park stations and a maintenance station.

SMP products are batch produced and catalysed 'In-Line' immediately prior to filling of Cartridges, Sausages and Tubes. High Volume white SAF is prepared in a 1,500L Disperser and pumped to a 2,400L Buffer Press. The Buffer Press maintains a nominal pressure on the product and is pumped from the Buffer Press to the High-volume filling line with a continuous process fed from the Disperser that is a batch process. SPAK is batch produced in a 200L mixer, which is dropped into a chamber below and screwed to a filling Hopper and filled while the next batch is being produced in the Mixer above.

Filling / Case Packing Lines

There are seven (7) filling lines, these include:

<u>High Speed Cartridge</u>

The High-Speed Cartridge line consists of an integrated Filler and Case Packer, fitted with a 3rd party accumulator between the Filler and Accumulator. Cartridges are 310 mL and are packed with six (6), 12, 20 units/Case with nozzles clipped onto the cartridge.

<u>Low Speed Cartridge</u>

The Low-Speed Cartridge line consists of an integrated Filler, 'In-Line' catalyser and Case Packer, fitted with a 3rd party accumulator between the Filler and Accumulator. Cartridges are 310mL and are packed with six (6), 12, 20 units/Case with nozzles clipped onto the cartridge.

<u>Sausage</u>

The Sausage line consists of an integrated Filler and Case Packer. Sausages are 300mL, 500mL, 600mL and are packed with nine (9), 12, 15 units/Case with nozzles loose in the Case.

Tottle

The Tottle line consists of a Filler with manual Case Packing. Tottles are 330 mL and 770 mL and are packed with six (6), 8, 12 units/Case.

Tube

The Tube line consists of a repurposed Filler from the Subject Site and filled tubes are manually packed in crates for blister packing off site. Tubes are 5mL, 10mL, 50mL, 100mL and 200mL.

Tub

The Tub line consists of a Filler and a 3rd party Case Packer. Tubs are 250mL, 400mL, 500mL, 1,100mL, and 2,300mL and are packed with two (2), four (4), six (6) and 12 units/Case.

SPAK Tub

The SPAK Tub line consists of a Filler and with a 3rd party Case Packer. Tubs are 250mL, 400mL, 500mL, 600 mL, 1,100mL, and 2,300mL and are packed with two (2), four (4), six (6), and 12 units/Case.

TABLE 12 below provides a breakdown of the dangerous goods (DGs) to be stored and handled at the Subject Site as a result of the proposed development.

TABLE 12. DANGEROUS GOODS

Class	Quantity	SEPP Threshold (Quantity/Distance)	Threshold Exceeded (Y/N)
2.1	50kg	100kg	Y
3 PGII & PGIII	358,900L	10.8m-11.7m	N
4.1	50kg	5,000kg or L	Y
5.1	50kg or L	5,000kg or L	Y
5.2	600kg or L	10,000kg or L	Y
6.1	0	2,500kg or L	Y
8 PGII	38,500kg or L	25,000kg or L	N
8 PGIII	11,000kg or L	50,000kg or L	Y
9	4,500kg or L	N/A	Y

3.3.4 Timing

3.3.4.1 Staging

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

3.3.4.2 Phases

The approximate phases and duration of works are as follows:

- Phase 1 – Demolition, earthworks and civil works = Nine (9) months;
- Phase 2 – Refurbishment and construction = Seven (7) months; and
- Phase 3 –Fitout including operational plant and equipment = 15 months

3.4 PROJECT NEED

The proposed development will allow for Selleys to meet the growing demand for sealants, adhesives and fillers across Australia and New Zealand and will allow for future export to Asia as a result of the current and project growth of development, particularly in the south and north-west growth corridors. The proposed development will also secure the viability of the existing operations at the Subject Site as it revitalises underutilised industrial land with ageing infrastructure (being post WW2 factory construction with assets and technology linking back to this period), creating a state of the art manufacturing facility which will allow for continued growth into the foreseeable future.

The proposed development would provide Australian produced products to support the local construction and housing industries. The proposed development would support the ongoing growth of these sectors, particularly in the southern district whilst promoting industry diversification, attracting investment opportunities and providing an economic catalyst in the South District.

3.5 CONSIDERATION OF ALTERNATIVES

The purpose of the proposed development is to meet the growing demand for Selleys products and enhance the economic viability of the existing operations, whilst contributing towards the intended industrial character and nature of the IN1 zone; providing a manufacturing facility and warehouse which encourages employment opportunities and promotes the economic development of the Padstow industrial area. The proposed development seeks to ensure:

- It is compatible with surrounding development and the local context;
- It would provide increased operational efficiencies for manufacturing, storage and distribution of goods;
- It would result in minimal impact on the environment; and
- It would allow for the implementation of suitable mitigation measures, where required.

Overall, the scale of the proposed development is considered suitable, and the built form proposed would completely enhance and renew an undeveloped and underutilised land portion into a modernised, state-of the art facility, which will be completely consistent with surrounding industrial-related uses in close proximity to the Subject Site and the wider area. The site design and layout of the built form proposed, seeks to maintain consistency with the zone objectives under the CBLEP2023 and enhance the underlying industrial character intended for the identified land, which is zoned for such permissible land uses. Furthermore, this would be achieved by the resultant built form that would reinforce the nature of the land use and is sensitive to the surrounding environment.

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

(a) 'Do Nothing' Scenario

This option was dismissed as the objectives of the proposal would not be met, including the objective of facilitating an improved employment-generating development. If the proposed development was not to proceed, the Subject site would remain underutilised and would not be able to meet the growing demands of the Selleys business.

(b) Development on an Alternative Site

Consideration to alternative sites were made, however these were dismissed as the Subject Site resulted in the most beneficial outcomes for the proposal as:

- It is already being operated by Dulux Group and Selleys for the intended purposes;
- It is located within a site zoned for employment generating purposes;
- The Subject Site has appropriate proximity from sensitive land activities including residential development;
- All potential environmental impacts of the proposal can be suitably mitigated within the Subject Site;
- The proximity to the regional road network provides increased economic benefits;
- Has employment generating potential, during both the construction and operational phase;
- Sufficient separation is maintained to the interface of surrounding receivers;
- The proposal will not adversely affect any area of heritage or archaeological significance; and
- The proposal can be developed with appropriate visual amenity given its surrounding context.

The proposal is justified on the basis it is compatible with the locality in which it is proposed while having no unacceptable economic, environmental or social impact.

(c) Different Site Configuration

The configuration of the proposed development was chosen based on the Subject Site's topography; road access; operational efficiencies; as well as the need to respond to the character of the surrounding industrial zones.

It is noted that a different site configuration would not have been able to respond to the abovementioned site opportunities and constraints. **Figure 15** below depicts one of the alternate site configurations that was explored, however this option involved the sale of the car park at 20 Gow Street, with the parking areas incorporated at 15 Gow Street, however this would have significantly minimised operational efficiencies and opportunity for employment generating floor space. This option was therefore not considered appropriate.

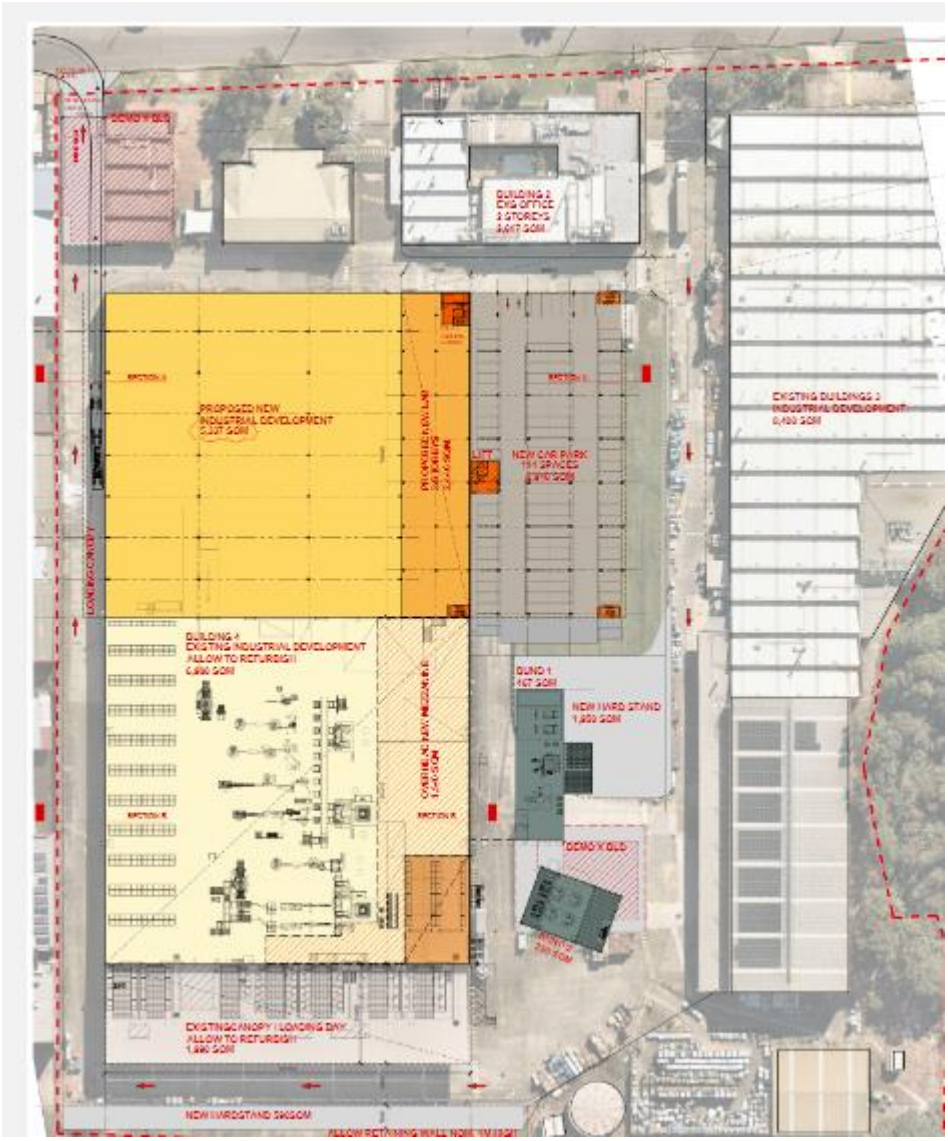


Figure 15. Alternative Site Configuration (Source: Vaughan Constructions, 2024)

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

PART 4 STATUTORY CONTEXT

4.1 CONTROLS AND POLICIES OVERVIEW

This part of the EIS aims to highlight and address the relevant statutory requirements that are related to the proposed development, as noted below.

Commonwealth Planning Context

- *Commonwealth Environment Protection and Biodiversity Conservation Act 1999*

State Planning Context

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2021*
- *Water Management Act 2000*
- *Biodiversity Conservation Act 2016*
- *Protection of the Environment Operations Act 1997*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *State Environmental Planning Policy (Planning Systems) 2021*
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021*
- *State Environmental Planning Policy (Sustainable Buildings) 2022*

Local Planning Context

- *Canterbury-Bankstown Local Environmental Plan 2023*
- Canterbury-Bankstown Development Control Plan 2023

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

4.1.1 Statutory Requirements

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

TABLE 13: STATUTORY REQUIREMENTS OVERVIEW	
Power to grant approval	In accordance with Schedule 1 of the Planning Systems SEPP, development that has an EDC of more than $30 million for the purpose of a manufacture of adhesives, constitutes SSD. As noted in **Section 1.5** of the EIS, the EDC of the proposed development is in excess of $30 million. The power to grant approval lies with the Minister for Planning (NSW DPHI) as the consent authority for SSD, pursuant to Section 4.5 of the EP&A Act.
Permissibility	The Subject Site is zoned IN1 General Industrial under the CBLEP2023. The proposed development aligns with the definition of 'general industries' and 'warehouse or distribution centres', which are permitted with consent in the IN1 General Industrial zone. Pursuant to the *Standard Instrument – Principal Local Environmental Plan*, a general industry is defined as follows:

	general industry *means a building or place (other than a heavy industry or light industry) that is used to carry out an industrial activity.* *Note—* *General industries are a type of* ***industry****—see the definition of that term in this Dictionary.* ***industrial activity*** *means the manufacturing, production, assembling, altering, formulating, repairing, renovating, ornamenting, finishing, cleaning, washing, dismantling, transforming, processing, recycling, adapting or servicing of, or the research and development of, any goods, substances, food, products or articles for commercial purposes, and includes any storage or transportation associated with any such activity* The proposed manufacturing and laboratory component of the proposed development involves the manufacturing, researching and development of goods for commercial purposes which is not a hazardous or offensive industry and is therefore suitably categorised as a generally industry which is permissible with consent in IN1 zone. Pursuant to the *Standard Instrument – Principal Local Environmental Plan*, a warehouse or distribution centre is defined as follows: ***warehouse or distribution centre*** *means a building or place used mainly or exclusively for storing or handling items (whether goods or materials) pending their sale, but from which no retail sales are made, but does not include local distribution premises.* The ancillary warehouse will be used for the storage of goods produced, pending their sale, but from which no retail sales are made and is therefore suitably categorised as a warehouse or distribution centre which is permissible with consent in the IN1 zone.
Other approvals	The proposal is identified as an activity pursuant to Schedule 1 of the *Protection of the Environment Operations Act 1979* (POEO Act) and therefore requires a license before the operations may be carried out.
Pre-condition to exercising power to grant approval	Pre-conditions to exercising the power to grant approval are outlined in **TABLE 13** below.
Mandatory matters for consideration	Mandatory matters of consideration by the consent authority are outlined in **Appendix C** of this EIS.

4.1.2 Pre-conditions

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

TABLE 14: PRE-CONDITIONS OVERVIEW			
Statutory Reference	**Pre-Condition**	**Relevance**	**Addressed in EIS**
State Environmental Planning Policy (Resilience and Hazards) 2021	The consent authority must not grant consent unless (as stipulated by Clause 2.8 of the Resilience and Hazards SEPP) it is satisfied that: *(a) the biophysical, hydrological or ecological integrity of the adjacent coastal wetland or littoral rainforest, or* *(b) the quantity and quality of surface and ground water flows to and from the adjacent coastal wetland or littoral rainforest.*	A BDAR and Civil Report have been provided which demonstrate that the proposed development would not result in any adverse impacts to the coastal wetland.	Refer to **Section 6.1.6** and **6.1.17** of this EIS
	The consent authority must consider (as stipulated by Clause 3.12 of the SEPP): *i) current circulars or guidelines published by the Department of Planning relating to hazardous or offensive development, and* *ii) whether any public authority should be consulted concerning any environmental and land use safety requirements with which the development should comply, and* *iii) in the case of development for the purpose of a potentially hazardous industry—a preliminary hazard analysis prepared by or on behalf of the applicant, and* *iv) any feasible alternatives to the carrying out of the development and the reasons for choosing the development the subject*	A Preliminary Hazard Analysis of the proposed development has identified the development as potentially hazardous.	Refer to **Section 6.1.10** of this EIS

	of the application (including any feasible alternatives for the location of the development and the reasons for choosing the location the subject of the application), and v) *any likely future use of the land surrounding the development.*		
	The consent authority must not grant consent unless (as stipulated by Clause 4.6 of the Resilience and Hazards SEPP): *vi) it has considered whether the land is contaminated, and* *vii) if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and* viii) *if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.*	Preliminary investigations of the Subject Site have identified that the land may be made suitable for the proposed development.	Refer to **Section 6.1.8** of this EIS.
State Environmental Planning Policy (Transport and Infrastructure) 2021	**Traffic-generating development:** Pursuant to Clause 2.112 of the Transport and Infrastructure SEPP, before determining the application the consent authority must — *(a) give written notice of the application to TfNSW within 7 days after the application is made, and* *(b) take into consideration—*	The proposal involves an industry and the Subject Site which has access within 90m of a classified road exceeds 5,000m^2. The proposal constitutes traffic-generating	Refer to **Section 6.1.3** of this EIS.

	(i) any submission that RMS provides in response to that notice within 21 days after the notice was given (unless, before the 21 days have passed, TfNSW advises that it will not be making a submission), and *(ii) the accessibility of the site concerned, including—* *(A) the efficiency of movement of people and freight to and from the site and the extent of multi-purpose trips, and* *(B) the potential to minimise the need for travel by car and to maximise movement of freight in containers or bulk freight by rail, and* *any potential traffic safety, road congestion or parking implications of the development.*	development, as described in Schedule 3 of the Transport and Infrastructure	
State Environmental Planning Policy (Biodiversity and Conservation) 2021	Pursuant to Clause 2.10(2) of the Biodiversity and Conservation SEPP, a permit cannot be granted to clear native vegetation in any non-rural area of the State that exceeds the biodiversity offsets scheme threshold.	A Biodiversity Development Assessment Report has been prepared.	Refer to **Section 6.1.17** of this EIS.
State Environmental Planning Policy (Sustainable Buildings) 2022	Pursuant to Clause 3.2 of the Sustainable Buildings SEPP, development consent must not be granted to non-residential development unless the consent authority is satisfied that the embodied emissions attributable to the development have been quantified	The embodied emissions attributable to the development have been quantified.	Refer to **Section 6.1.19** of this EIS.
Canterbury-Bankstown Local Environmental Plan 2023	**Flood Planning:**	A Flood Impact Assessment Report has been prepared which	Refer to **Section 6.1.7** of this EIS.

	Pursuant to Clause 5.21 of the CBLEP2023, development consent must not be granted unless the consent authority is satisfied the development — *(a) is compatible with the flood function and behaviour on the land, and* *(b) will not adversely affect flood behaviour in a way that results in detrimental increases in the potential flood affectation of other development or properties, and* *(c) will not adversely affect the safe occupation and efficient evacuation of people or exceed the capacity of existing evacuation routes for the surrounding area in the event of a flood, and* *(d) incorporates appropriate measures to manage risk to life in the event of a flood, and* *(e) will not adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses.*	considers the impacts of the proposed development on flood affectations.	
	Acid Sulfate Soils Pursuant to Clause 6.1 of the CBLEP2023, development consent must not be granted for the carrying out of works unless an acid sulfate soils management plan has been – *(a) prepared for the proposed works in accordance with the Acid Sulfate Soils Manual, and* *(b) provided to the consent authority.*	An Acid Sulfate Soil Management Plan has been prepared in accordance with the Acid Sulfate Soils Manual.	Refer to **Section 6.1.9** of this EIS.
	Earthworks:	Earthworks are proposed as part	Refer to **Section 6.1.9** of this EIS.

	Pursuant to Clause 6.2 of the CBLEP2023, in deciding whether to grant development consent for earthworks (or for development involving ancillary earthworks), the consent authority must consider the following matters—. *i) the likely disruption of, or the detrimental effect on, drainage patterns and soil stability in the locality of the development,* *ii) the effect of the development on the likely future use or redevelopment of the land,* *iii) the quality of the fill and the soil to be excavated,* *iv) the effect of the development on the existing and likely amenity of adjoining properties,* *v) the source of the fill material and the destination of the excavated material,* *vi) the likelihood of disturbing relics,* *vii) the proximity to, and potential for adverse impacts on, a waterway, drinking water catchment or environmentally sensitive area,* *viii) appropriate measures proposed to avoid, minimise or mitigate the impacts of the development.*	of this development application, requiring consideration of Clause 6.2 of the CBLEP2023.	
	Biodiversity:	A Biodiversity Development Assessment Report has been prepared which considers the impacts of the	Refer to **Section 6.1.17** of this EIS.

	Pursuant to Clause 6.4 of the CBLEP2013, development consent must not be granted to development on land identified as 'Biodiversity' unless the consent authority is satisfied that – *(a) the development is designed, sited and will be managed to avoid a significant adverse environmental impact, or* (b) *if a significant adverse environmental impact cannot be reasonably avoided by adopting feasible alternatives—the development is designed, sited and will be managed to minimise the impact.*	proposed development on areas of biodiversity significance.	

PART 5 ENGAGEMENT

An application to receive project-specific SEARs was submitted to NSW DPHI, with the SEARs (reference: SSD-71052213) subsequently issued on 18 June 2024.

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

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

- Canterbury-Bankstown Council;
- Department of Climate Change, Energy, the Environment and Water, specifically the:
  - Environment and Heritage Group;
  - Water Group;
  - Environment Protection Authority;
- Heritage NSW;
- Transport for NSW;
- Fire & Rescue NSW;
- Sydney Water;
- Endeavour Energy;
- Jemena;
- Surrounding local landowners, businesses and stakeholders · local and regional community and environmental groups;
- Gandangara Local Aboriginal Land Council; and
- Any other public transport, utilities or community service providers.

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

A comprehensive Engagement Report (located in **018** of this EIS) has been prepared by HillPDA, in support of the proposed development, offering a summary and analysis of all community and stakeholder consultations, distilling into themes, and those items identified in the consultation process, as significant.

This information is articulated within **Section 6.1.2** of this EIS, demonstrating that genuine consultation has already taken place with stakeholders, seeking feedback on the proposed development.

Pre-lodgement advice provided by Council is addressed in **TABLE 15** below.

TABLE 15: CANTERBURY-BANKSTOWN COMMENTS	
Council Comment	**Response**
PreDA Meeting Minutes dated 7 June 2024	
Applicant will be lodging a separate DA for demolition of the site.	Demolition of the existing improvements is sought as part of this SSDA.
- Clause 6.15 – Design Excellence of CBLEP 2013 applies to the site as the proposal involves a 'gross floor area of 5,000m² or more used for a warehouse or distribution centre'. As such, it is highly recommended that the Applicant lodge an application to obtain design advice from CBCity Design Review Panel prior to formal lodgement of the DA. Information regarding this process can be found via the following link:	Detailed assessment against Clause 6.15 of CBLEP2023 has been undertaken in **Appendix C** of this EIS.

TABLE 15: CANTERBURY-BANKSTOWN COMMENTS	
Council Comment	**Response**
www.cbcity.nsw.gov.au/development/design-review-panel	
Proposal as presented complies with the zoning of site and FSR requirements in accordance with the requirements of CBLEP 2023.	Noted.
Proposal must be designed in accordance with requirements of Chapter 9 – Industrial Precincts of CBDCP 2023	Detailed assessment against Chapter 9 of Canterbury-Bankstown Development Control Plan 2023 (CBDCP2023) is undertaken in **Appendix 11** of this EIS.
The proposal must comply with all car parking provisions outlined within Chapter 3.2 – Parking of CBDCP 2023. Council will not be supportive of any shortfall in the number of required car parking spaces.	The proposed development will result in a shortfall of car parking spaces. Detailed assessment of the proposed shortfall is undertaken in **Section 6.1.3** of this EIS.
Site must be designed so that all vehicles and trucks are able to enter, manoeuvre and exit the site in a forward direction.	All vehicles and trucks will enter, manoeuvre and exit the Subject Site in a forward direction.
Notwithstanding all other relevant documentation/plans required to be submitted as part of the DA, the DA must be accompanied by a detailed SEE, Flood Study Report, Geotechnical Report, Acoustic Report, Traffic Report, Swept Path Analysis, Air Pollution Assessment and Process Hazard Analysis (PHA).	All required documentation has been submitted as part of this SSDA.
Proposal is an identified traffic generating development pursuant to Schedule 3 of the Transport and Infrastructure SEPP and is required to be referred to Transport for NSW (TfNSW).	Noted.
Council Comments for Consideration dated 2 July 2024	
Waste	
1. Required to submit a waste management plan using Council's Waste Design for New Developments – Guide F	Construction and Operational Waste Management Plans are provided within **Appendices 14** and **31** of this EIS.
2. Ensure collection of waste is on-site and meets AS2890.2 Standards	All waste collection will comply with *AS2890.2 Standards*.
3. Show location of loading dock(s) and bin room(s)	The location of all loading docks and bin rooms are provided in **Appendix 8** of this EIS.
Environmental Health	
4. Due to the history of the site a Stage 2 Detailed Site Investigation (DSI) is required and must be carried out by a duly qualified contaminated land consultant in accordance with: ▪ *Council's Contaminated Land Policy,* ▪ *Relevant EPA Contaminated Land Management Guidelines, and* ▪ *National Environment Protection (Assessment of Site Contamination) Measure 1999, amended in 2013 (ASC NEPM, 2013).*	A Preliminary and Detailed Site Investigation (PSI & DSI) and Remediation Action Plan (RAP) are provided within **Appendices 33** and **36** of this EIS which include an assessment of all relevant legislation.
5. The DSI report must be prepared or reviewed and approved by an appropriately qualified and certified environmental consultant. The front cover of the	Details of the consultant's certification have been provided within **Appendices 33** and **36** of this EIS.

TABLE 15: CANTERBURY-BANKSTOWN COMMENTS	
Council Comment	**Response**
report must include the details of the consultant's certification.	
6. A preliminary Acid Sulfate Soils Assessment is required as the proposed development is located within areas mapped as Class 2 Acid Sulfate Soils. This assessment is to be carried out by a suitably qualified environmental consultant in accordance with the 'Acid Sulfate Soils Assessment Guidelines' (NSW Acid Sulfate Soils Management Advisory Committee, 1998).	An Acid Sulfate Soils Management Plan is provided within **Appendix 4** of this EIS.
7. The entire site (includes any structures) is to be assessed for hazardous materials, especially asbestos. A Hazardous Materials (HAZMAT) Report is to be prepared by an inspection body accredited by the National Association of Testing Authorities Australia (NATA).	A Destructive Hazardous Materials Survey Report is provided within **Appendix 16** of this EIS.
8. As the proposal falls under an EPA Licensed Facility the proposal will need to be referred to the NSW Environmental Protection Authority for comment.	Noted.
Traffic	
9. Table 3 indicates a significant reduction in traffic generation related to staff. The expansion/redevelopment of a site usually increases the capacity and hence staff numbers. The application needs to provide more information in terms of current staff numbers and trip rates etc.	Detailed assessment of the traffic generation is undertaken in **Section 6.1.3** of this EIS.
10. As indicated in Table 6 in the Scoping Report, the following details are expected in the Traffic Impact Assessment: ▪ *The details of existing and future truck generation volumes* ▪ *The details of existing and future staff vehicle generation volumes, and* ▪ *Staff parking demand.*	A Traffic Impact Assessment is provided within **Appendix 42** of this EIS which includes all relevant details.
11. The driveway access points for trucks and staff vehicles to be shown clearly on the drawings including swept paths.	Swept paths are included within **Appendix 42** of this EIS.
12. The site is being developed and increasing GFA from 11570+6798+378 = 18,746m² to 28,257m² (from Table 2 of the Scoping Report). The increase is 9,511m². This seems like an error and needs to be rectified, however if the figure is accurate, it needs to be justified.	GFA calculations are provided within **Appendix 8** of this EIS.
13. With 180 staff at any time – does this generate only 28vpd? The existing use is 40vpd. There should not be a reduction in the number of trips.	Detailed assessment of the traffic generation is undertaken in **Section 6.1.3** of this EIS.
Urban Design	
14. The proposal has shown the retention of a strip of lawn to the east of the proposed car park in the center of the complex. The proponent should utilise this lawn as deep soil planting zone to address Objective 4, Section 2 of Chapter 9.1 DCP (page 6) for enhancing deep soil zones within industrial sites.	Additional deep soil planting has been provided where practicable as confirmed in the Landscape Plans provided within **Appendix 29** of this EIS.

TABLE 15: CANTERBURY-BANKSTOWN COMMENTS	
Council Comment	**Response**
15. The proposal does not show any trees within the proposed car park area. The proponent should include at least one tree per five car parking spaces to increase canopy cover and natural shading as required under Control 3.46, Section 3 in Chapter 3.2 DCP (page 22)	No new car parking spaces are proposed. As detailed in **Section 6.1.3** of this EIS the existing parking is sufficient to cater for the demands of the proposed development, however the loss of parking spaces to provide canopy cover would result in further non-compliances having regard to parking.
16. The proposal should provide a sustainability design report to demonstrate their sustainable design targets and methodology such as using solar panels, collecting and reusing water on site, using recycled materials, etc.	An ESD Report has been provided in **Appendix 19** which includes sustainable design targets and methodologies.
17. The proposal does not show any staff amenity spaces within the development. The proponent should include staff amenity spaces as per Control 2,5, Section 2 in Chapter 9.1 DCP (page 10) (including a combination of hardscape and softscape elements.	A substantial external staff amenity is proposed adjacent to the existing office including a BBQ and seating area. Further, a number of internal amenity spaces are provided throughout the existing development. As no change to the staff numbers is proposed, this is considered adequate to accommodate the staff needs.
Open Space	
18. Part of this proposed development site is zoned RE1. The report states "No development is proposed on the land zoned RE1." If this were to change, Council should be notified immediately.	No development is proposed on the land zoned RE1.
19. While the land zoned RE1 is not being developed the impacts of the development on this land (and all adjacent open space land) should be identified. Impacts might include: potential for runoff, accidents, severe weather events, ongoing odour, overshadowing and noise.	Impacts to this land and surrounding RE1 land has been considered throughout the relevant technical documents.
20. This site may have a history of contamination in its former use as a battery manufacturing plant. It is noted that previous DAs for installation of groundwater monitoring wells in the Salt Pan Creek area were refused. Future installations of groundwater monitoring wells are to be installed within the confines of the proposed development site, and reports be provided to Council, as these may indicate what is occurring within the public open space.	The installation of groundwater monitoring wells is included in the RAP provided within **Appendix 36** of this EIS.
Flooding, Stormwater & Drainage	
21. Table 5 in the Scoping Report indicates a flood study will be conducted for this SSDA. The site is affected by the 1% AEP (100-year ARI) and Probable Maximum Flood (PMF) flooding extents.	Noted.
22. The subject site (1 – 15 Gow Street) is partially flood affected where the applicant need to get Stormwater System Report (SSR) from Council.	Noted.
23. Stormwater drainage design for the proposed development shall be prepared in accordance with Section 2, Chapter 3.1 DCP.	All stormwater drainage has been designed to comply as detailed in **Section 6.1.6** of this EIS.
24. No Council drainage infrastructure is within the site.	Noted.
Roads	

TABLE 15: CANTERBURY-BANKSTOWN COMMENTS	
Council Comment	**Response**
25. Gow Street Road pavement is in poor condition. An upgrade of the road pavement adjoining the site is required as a condition of any approval granted by the Department.	It is requested that the upgrade of the road pavement been undertaken as a Works-In-Kind (WIK) agreement with Council as detailed in **Section 6.1.20** of this EIS.
26. Should provide a path along Gow Street to Fairford Road, and a path connection to Gow Street Reserve and Salt Pan Creek shared path.	The proposed development does not seek to alter the existing area within the road reserve.
27. An upgrade of facilities in Gow St Reserve which is utilised by the workers should be provided.	Sufficient internal and external facilities are provided on-site for staff, and it would be considered onerous to require any further upgrade of such facilities external to the Subject Site.
Landscaping	
28. Landscaping needs to be significant to provide a positive visual appearance for the area including workers and visitors to the site.	Additional deep soil planting has been provided where practicable as confirmed in the Landscape Plans provided within **Appendix 29** of this EIS.
29. Onsite greening required to reduce heat due to large expanse of building footprint, concrete surfaces and roofing. The EIS must demonstrate how urban heat impact is minimised by the proposed development.	Building footprints and concrete surfaces have been minimised where unnecessary and additional landscaping provided where practicable.
30. A landscape plan which addresses Chapter 9.1 DCP for improved greening and tree canopy.	Assessment against CBDCP2023 has been undertaken in **Appendix 11** of this EIS.
Civil Works	
31. All civil works along Gow Street associated with the proposed development must be in accordance with Council's Asset System & Planning unit requirements.	All civil works undertaken will be designed to comply.
Carpark and Vehicle Access	
32. The design of carpark, vehicular access and swept path of the largest commercial vehicle servicing the proposal, shall be in accordance with AS2890 series.	All car parking and vehicle access has been designed to comply.
33. A design report which should consider access to/from the site and employee/user amenity.	A Design Report is provided within **Appendix 15** of this EIS which considers access and employee/user amenity.
Other	
34. Design excellence must be considered as part of the proposed development. Council notes it is not a requirement in the SEARs, therefore we request the applicant submits the proposal in accordance with Council's Design Review Panel procedures: https://www.cbcity.nsw.gov.au/development/design-review-panel	Assessment of the proposed development against the design excellence provisions has been undertaken in **Appendix C** of this EIS, noting that Council's Design Review Panel is not a mandatory requirement under Clause 6.15 of CBLEP2023.
35. River quality/biodiversity impacts on Salt Pan Creek should be considered as part of the Biodiversity Development Assessment Report (BDAR).	A Biodiversity Development Assessment Report (BDAR) is provided within **Appendix 10** of this EIS which considers impacts to Salt Pan Creek.

PART 6 ASSESSMENT OF IMPACTS

6.1 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

The SEARs (reference: SSD-71052213), issued by the NSW DPE on 18 June 2024, identify the following Key Issues:

1. Statutory and Strategic Context
2. Community and Stakeholder Engagement
3. Traffic and Transport
4. Noise and Vibration
5. Air Quality and Odour
6. Water Management
7. Flooding
8. Contamination
9. Soils
10. Hazard and Risk
11. Fire and Emergency Services
12. Visual
13. Waste Management
14. Infrastructure Requirements
15. Aboriginal Cultural Heritage
16. Non-Aboriginal Cultural Heritage
17. Biodiversity
18. Social
19. Ecologically Sustainable Development
20. Planning Agreements/Development Contributions

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

6.1.1 Statutory Context

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

In response to item 1 Statutory Context of the SEARs, **TABLE 16** specifies the location of each assessment of the relevant statutory and strategic documents.

TABLE 16: STATUTORY CONTEXT REVIEW

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

TABLE 16: STATUTORY CONTEXT REVIEW	
Document	**Response / Location of Assessment**
Address the requirements of any approvals applying to the site, including any concept approval or recommendation from any Gateway determination.	Refer to **Section 2.2** of this EIS.

6.1.2 Community and Stake Holder Engagement

An Engagement Report has been prepared by HillPDA and is provided in **Appendix 18**. A detailed engagement plan was developed in consultation with the proponent and in line with the NSW DPHI's *Undertaking Engagement Guidelines for State Significant Projects*. It committed to the delivery of a considered, open and evidence-based approach to the engagement.

6.1.2.1 Engagement Carried Out

An overview of the engagement carried out is provided below:

TABLE 17: STAKEHOLDER CONSTULATION AND ENGAGEMENT UNDERTAKEN			
Local Community and Sensitive Receivers			
Activity and Stakeholders (S)	**Aim**	**Actions**	**Collateral**
Newsletter ▪ Likely sensitive receivers; and ▪ Possible sensitive receivers.	▪ Introduce the proposed development to the local community early in the process; and ▪ Provide an accessible and flexible contact methods to enable stakeholders to raise issues/concerns prior to submission.	Distribute newsletter to 40 Tier 1 stakeholders (being local community members and business), completed on the weekend of the 27/28th July 2024.	Community newsletter (refer to Appendix A of **Appendix 18**) containing: ▪ Information about the proposed development; ▪ Contact details for HillPDA's engagement team (including a phone number to contact HillPDA via a translation service); ▪ A link to HillPDA's engagement portal; and ▪ A link to DPHI's Planning Portal page for the proposed development.
Engagement portal (website) & online survey ▪ Likely sensitive receivers ; and ▪ Possible sensitive receivers.	▪ Introduce the proponent and the proposed development to the local community early in the process; ▪ Provide an opportunity to identify and address any issues or concerns raised (relating to the existing environment or the proposal) prior to submission; and ▪ Provide accessible and convenient option for the wider local community (Tier 1 stakeholders) to provide feedback.	▪ Establish a webpage for the proposal (along with a survey and submissions inbox) on HillPDA's engagement portal; and ▪ Survey active from 26 July 2024 – 31 August 2024.	Engagement portal (refer to Appendix B of **Appendix 18**) containing: ▪ Information about the proposed development; ▪ Contact details for HillPDA's engagement team; ▪ A link to HillPDA's engagement portal; ▪ A link to DPHI's Planning Portal page for the proposal; and ▪ Online survey (refer to Appendix C of **Appendix 18**).
Relevant Agencies and Organisations			
Stakeholder	**Actions**		
DPHI	▪ A pre-scoping meeting was held with DPHI on Friday 12 April 2024 at 2pm and attended by representatives from the project team and Willowtree Planning; ▪ Preliminary architectural plans were provided to Environmental Assessment Officers from DPHI prior to the pre-scoping meeting on Thursday 11 April 2024; and ▪ Prior to issuing project SEARs, DPHI sent letters agencies and organisations for feedback dated 23 May 2024.		

Agencies and Organisations	A letter was distributed to state agencies and peak organisations to inform them of the proposed development and invite feedback during the early planning phase via email on 10 September 2024. Agencies included: ▪ Department of Climate Change Energy, the Environment and Water (DCCEEW); o Environment and Heritage Group; o Water Group; o Environment Protection Authority (EPA); ▪ Heritage NSW; ▪ Transport for NSW; and ▪ Fire and Rescue NSW. Where an agency/organisation was contacted by a technical specialist, the outcome of their discussions has been incorporated into the Engagement Report. Agencies include: ▪ Sydney Water ▪ Ausgrid ▪ Telstra ▪ NBNCo ▪ Gandangara Local Aboriginal Council
Council	▪ On 2 July 2024, Canterbury-Bankstown Council sent a letter via email to the Senior Environmental Assessment Officer from DPHI involved in processing the SEARs request for the proponent. Council provided a late submission on the issued SEARs document, outlining Council's comments and issues for consideration in the preparation of the EIS; ▪ A meeting, attended by representatives from Selleys, Dulux Group and Willowtree Planning, was held with members from the project team and Canterbury-Bankstown Council on 7 July 2024 for pre-lodgement advice; and ▪ The proponent provided an overview of project and Council provided advice on requirements for submission.
Local Aboriginal Community Consultation	▪ 28 May 2024 - Biosis wrote to organisations to develop a list of potentially interested Aboriginal parties to inform their Aboriginal Cultural Heritage Assessment Report (ACHAR); ▪ 29 May 2024 - public notice was published in The Daily Telegraph inviting Aboriginal people who hold cultural knowledge to register their interest in a process of community consultation to provide assistance in determining the significance of Aboriginal object(s) and/or places in the vicinity of the Subject Site; ▪ On 14 June – Aboriginal groups and stakeholders were sent a of invitation to participate in community consultation and share knowledge; ▪ July 2024 - RAPs provided with details about the proposed development works (project information pack); and ▪ 2 July 2024 – RAPs provided with copies of the project methodology.

Local Community Group	On 10 September 2024, a letter containing an overview of project details and contact details to provide feedback or comments was sent to local community groups, including: ▪ Bankstown Bushland Society Inc.; ▪ Bankstown Historical Society Inc.; and ▪ Australian Plants Society – Harbour Georges River Group.

6.1.2.2 Community and Agencies Views

A comprehensive table of community and agency engagement is included within **Appendix D** of this EIS which includes detailed commentary as to how each response has been adequately considered in the proposed development and appropriate management and mitigation measures proposed where required.

6.1.2.3 Engagement to be Carried Out

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

6.1.3 Traffic and Transport

A Traffic Impact Assessment has been prepared by Ason Group and is provided in **Appendix 42**. The following provides an overview of the existing traffic environment, as it relates to the Subject Site.

6.1.3.1 Existing Environment

The road network surrounding the Subject Site includes a mix of state, regional and local roads. Key roads and intersections within proximity to the Subject Site are detailed in **TABLE 18** below.

TABLE 18: KEY ROADS

Road Name	TfNSW Classification	Posted Speed (km/hr)	On-Street Parking Opportunities	Traffic Lane
M5 Motorway	State Road	100	No	Provides three (3) traffic lanes in each direction separated by a raised central median
Fairford Road	State Road	70	No	Provides two (2) traffic lanes in each direction separated by a raised central median
Canterbury Road	State Road	60	No	Provides two (2) traffic lanes in each direction separated by line marking
Gow Street	Local Road	50	Yes	Provides one (1) traffic lane in each direction separated by line marking

There are six (6) existing driveways connecting the Subject Site to Gow Street. It is noted that 26.0m B-Double vehicles are permitted to exit Gow Street into Canterbury Road with access permitted from Canterbury Road to Gow Street. The closest train station to the Subject Site is Padstow Station which is approximately 2km to the south. Two (2) bus stops are located within 400m of the Subject Site, with a further six (6) bus stops within 800m which provide access to suburbs such as Hurstville, Parramatta and Bankstown. No pedestrian footpath exists adjacent to the Subject Site. Off-road shared cyclist paths exist to the north and east of the Subject Site.

Traffic surveys have been undertaken for the existing operations at the Subject Site which are presented in **TABLE 19** below.

TABLE 19: EXISTING SITE GENERATION							
Vehicle Class	**AM Peak (7:45 – 8.45)**			**PM Peak (15:00 – 16:00)**			**Daily**
	In	**Out**	**Total**	**In**	**Out**	**Total**	**Total**
Light Vehicle	38	2	40	4	19	23	395
Heavy Vehicle	4	12	16	2	2	4	88
Light Vehicle + Heavy Vehicle	42	14	56	6	21	27	483

Note: morning and afternoon peak hours are the road network peak hours taken from the surveys

A SIDRA Analysis of the existing operational performances of the key intersection has been undertaken and the results indicating a satisfactory performance are provided in the Traffic Impact Assessment prepared by Ason Group and provided in **Appendix 42**. **TABLE 20** below summarises the results.

TABLE 20: EXISTING OPERATIONAL PERFORMANCE				
Intersection	**Peak**	**AVD (s)**	**LoS**	**DoS**
Canterbury Road / Gow Street	AM	8	A	0.75
	PM	15	B	0.87
Fairford Road / Gow Street	AM	14	A	0.54
	PM	18	B	0.56

6.1.3.2 Assessment of Impacts

Parking

A parking survey was conducted from 7:00pm Monday 29 July 2024 to 7:00pm on Tuesday 30 July 2024 to assess the sufficiency of the existing off-street and on-street car spaces for the existing operations at the Subject Site. The survey shows a maximum occupancy of 172 off-street car parking spaces during the day, leaving 51 available spaces during the busiest hour at 1:45pm.

The on-street car parking assessment results indicate that the availability of on-street parking spaces around the Subject Site is sufficient for existing demand, with 10 unused spaces available during the busiest time at 9:45 am. It is noted that four (4) on-street parking spaces would be lost to accommodate the proposed turning space for articulated vehicles.

The CBDCP2023 stipulates the following parking requirements:

- Industries: One (1) space per 100m^2 GFA;
- Warehouse: One (1) space per 300m^2 GFA or one (1) space per two (2) staff, whichever is greater; and
- Office: For office components less than 20% of the total GFA, one (1) space per 100m^2 GFA.

The following table provides an overview of the proposed development having regard to the parking requirements, noting that no additional car parking is proposed as part of this development.

TABLE 21: CAR PARKING					
Lane Use	**Proposed GFA (m^2)**	**Parking Rate**	**Parking Required**	**Existing Parking**	**Shortage**
Industrial (Manufacturing + Lab)	20,263	1 per 100m^2	203	**223**	**27**
Warehouse	5,986	1 per 300m^2	20		

Office	2,669	1 per 100m^2	27		
Total	**28,918**		**250**		

Notwithstanding the CBDCP2023 requirement for car parking, it is also important to consider the operational requirements of the Subject Site. The number of staff will be unaltered by the proposed development.

Therefore, it is expected that the existing car parking spaces will sufficiently accommodate the future parking demand. For sensitivity, a conservative assessment has been conducted to demonstrate that the existing car parking supply would provide enough spaces for the proposed development. In this assessment, a car parking rate was calculated based on the maximum existing car parking demand and total GFA. This derived rate was then applied to the proposed development's GFA to determine the required number of car parking spaces.

TABLE 22 shows the practical car parking rate for the Subject Site under existing operations, and **TABLE 23** shows the practical required number of car parking spaces for the proposed development.

TABLE 22: EXISTING CAR PARKING RATE

Existing GFA (m^2) [a]	Maximum Daily Car Parking Demand [b]	Practical Car Parking Rate [a + b x 100]
25,144	170	0.676 spaces per 100m^2 GFA

TABLE 23: CAR PARKING REQUIREMENTS (PRACTICAL)

Proposed GFA (m^2)	Practical Car Parking Rate	Car Parking Required
28,918	0.676 spaces per 100m^2 GFA	196 spaces

It can be seen that the proposal is expected to require 196 car parking spaces, which can be accommodated by the existing 223 car parking spaces. Based on the above, the proposed parking demand is anticipated to be similar to the existing demand, which can be accommodated by the existing car parking supply and is therefore considered acceptable. Further, a grass area adjacent to the easternmost internal driveway may be converted to 25 overflow bays if required.

It is noted that no visitor parking is nominated in CBDCP2023 however three (3) visitor spaces are provided.

CBDCP2023 stipulates the following accessible parking rates:

- One (1) accessible parking space per 50 parking spaces for staff; and
- One (1) accessible parking space per 50 parking spaces where a car park has less than 500 spaces.

The proposed development would generate a demand for six (6) accessible parking spaces. Six (6) accessible parking spaces are provided which complies.

CBDCP2023 stipulates the following bicycle parking rates:

- One (1) space per 20 staff; and
- Nil for visitors.

The proposed development would generate a demand for nine (9) bicycle parking spaces. Nine (9) bicycle parking spaces are provided which complies.

The proposed development includes three (3) lockers, six (6) showers (three (3) male and three (3) female) and two (2) changerooms (one (1) male and one (1) female) which satisfy the *Planning Guidelines for Walking and Cycling*.

Traffic Generation

Based on the traffic surveys detailed in **TABLE 19** above, the vehicle trip rates for the operations are calculated as below:

- AM Peak: 0.223 trips per hour per 100m^2 of GFA;
- PM Peak 0.107 trips per hour per 100m^2 of GFA; and
- Daily: 1.920 trips per hour per 100m^2 of GFA.

The proposed development is expected to have the similar trip generation as the existing since it will operate with the same number of staff. However, an increase from two (2) to three (3) operational shifts per day might distribute same number of staff across shifts, potentially reducing peak hour trip generation.

Reference is made to the *RMS Guide to Traffic Generating Developments – Updated Traffic Surveys Technical Direction 2013* (TDT2013/04a), specifically for the traffic generation rates for Business Parks and Industrial Estates. It is noted that the existing development is a combination of industrial (manufacturing + laboratory), warehouse, and office components, and based on the existing traffic generation survey data, the Subject Site operates similarly to business parks and industrial estates in terms of traffic generation rate. Therefore, the average traffic generation rate from sites 1, 3, and 4 in TDT2013/04a is considered applicable to the proposed development and is as follows:

- Morning and afternoon peak: 0.265 trips per hour per 100 m^2 of GFA.

This proposed rate is higher than the Subject Site's current operational rate, making it a conservative estimate. The application of this rate to the proposed yield results in the below rates:

TABLE 24: TRAFFIC GENERATION (TDT2013/04A RATES)

Period	Development GFA (m^2)	Vehicle Trips / Hr		
		Existing	Proposal	Net Change
AM	21,188	56	75	+19
PM		27	75	+48

Based on the existing surveys, the following vehicle class and inbound/outbound splits have been adopted:

- 80% light vehicle and 20% heavy vehicle;
- Light Vehicle:
  - 75% inbound traffic and 25% outbound traffic in the morning peak;
  - 25% inbound traffic and 75% outbound traffic in the afternoon peak;
- Heavy Vehicle:
  - 50% inbound traffic and 50% outbound traffic in the morning and afternoon peaks.

The traffic distribution was determined through a review of the permitted turning movements at key intersections (e.g. considering medians, right-turn bans, and similar). For the light and heavy vehicle routes, the routes identified are based on first-principal approach of analysis of the CIC survey data. Trip distribution is shown for the access points in **Figure 16** and **Figure 17**.

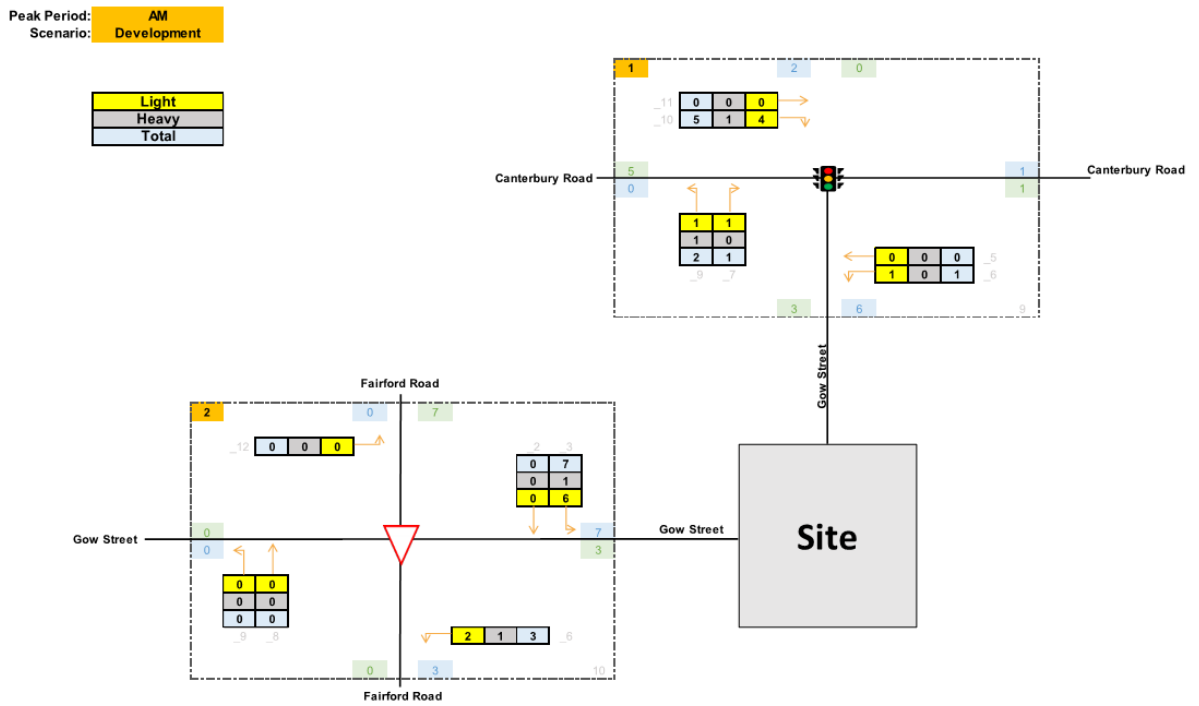


Figure 16. Trip Distribution – Morning Peak (Source: Ason Group, 2024)

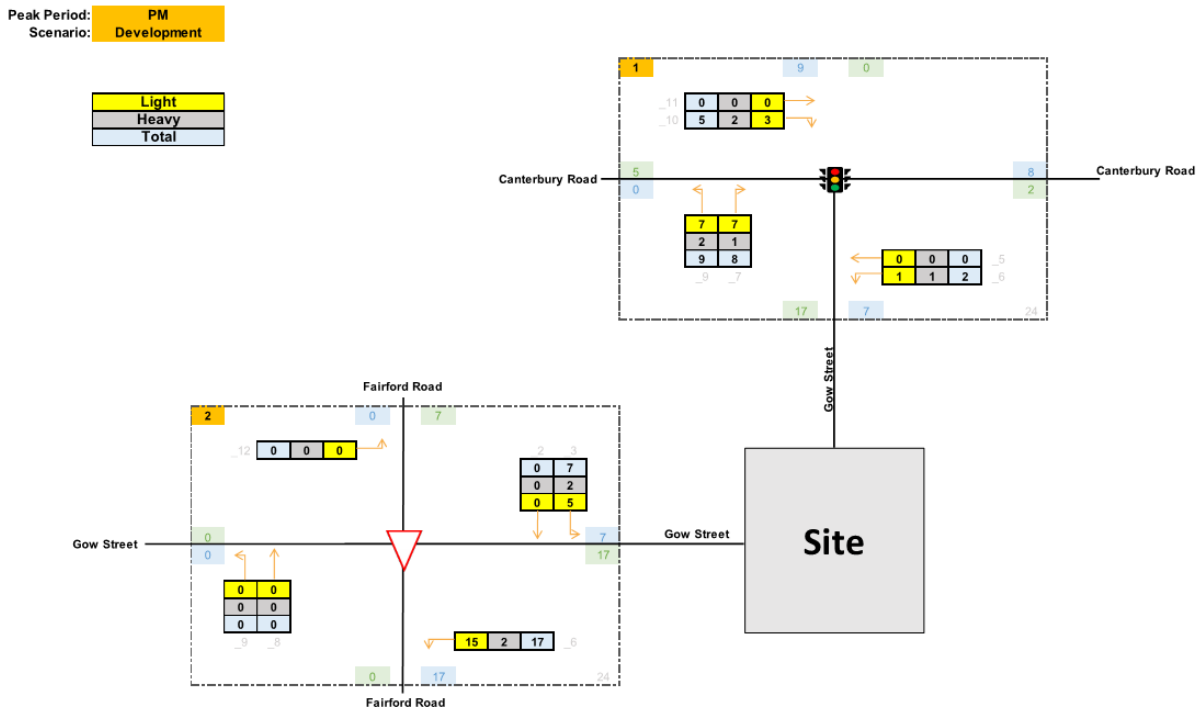


Figure 17. Trip Distribution – Afternoon Peak (Source: Ason Group, 2024)

In absence of any STFM model data, the following linear growth rates have been adopted in this assessment for:

- Canterbury Road: 1.5% per annum;
- Fairford Road: 1.5% per annum; and
- Gow Street: 1.0% per annum.

Appendix A of **Appendix 42** illustrates the turn flow diagrams for the 2026 and 2036 future base case and future project cases.

SIDRA modelling has been undertaken for both the morning and afternoon peaks for those scenarios listed below.

TABLE 25: MODELLING SCENARIOS

No.	Scenario	Year	Background Traffic
1	Existing	2025	Survey Data
2	Opening Base Case	2026	Survey + 2 Years Growth
3	Opening Project Case	2026	Survey + 2 Years Growth + Development Traffic
4	10-year Post Development Base Case	2036	Survey + 12 Years Growth
5	10-year Post Development Project Case	2036	Survey + 12 Years Growth + Development Traffic

The results of the modelling are detailed in **TABLE 26** and **TABLE 27** below.

TABLE 26: MODELLING SCENARIOS – EXISTING AND OPENING YEAR

Intersection	Peak	Scenario 1			Scenario 2			Scenario 3		
		AVD (s)	LoS	DoS	AVD (s)	LoS	DoS	AVD (s)	LoS	DoS
Canterbury Road / Gow Street	AM	8	A	0.75	9	A	0.79	9	A	0.79
	PM	15	B	0.87	20	B	0.91	23	B	0.92
Fairford Road / Gow Street	AM	14	A	0.54	15	B	0.55	15	B	0.55
	PM	18	B	0.56	19	B	0.57	20	B	0.58

TABLE 27: MODELLING SCENARIOS – 10 YEAR POST OPENING YEAR

Intersection	Peak	Scenario 1			Scenario 4			Scenario 5		
		AVD (s)	LoS	DoS	AVD (s)	LoS	DoS	AVD (s)	LoS	DoS
Canterbury Road / Gow Street	AM	8	A	0.75	45	D	1.02	47	D	1.03
	PM	15	B	0.87	60	E	1.07	63	E	1.08
Fairford Road / Gow Street	AM	14	A	0.54	22	B	0.64	22	B	0.64
	PM	18	B	0.56	36	C	0.66	42	C	0.71

The SIDRA modelling results can be summarised as:

- Opening Year of 2026 – Scenarios 2 & 3:
  - In both 2026 scenarios, both intersections would continue to operate at a similar Level of Service (LoS);
  - Additional trips generated by the proposal would result in a negligible increase in delay (up to three (3) seconds) at each key intersection;
  - Accordingly, the development will not have any material impact on the surrounding road network and will not worsen the LoS when compared to the existing baseline (Scenario 1);
- 10-year post opening of 2036 – Scenarios 4 & 5:
  - In both 2036 scenarios, both intersections would continue to operate at a similar LoS;
  - Additional trips generated by the proposal would result in a negligible increase in delay (up to six (6) seconds) at each key intersection;
  - Accordingly, the development will not have any material impact on the surrounding road network and will not worsen the LoS when compared to the existing baseline (Scenario 4).

As such the proposed development is supportable from traffic modelling grounds.

Design

The existing vehicle access driveways will remain in their existing positions. One (1) driveway is proposed to the west of the Subject Site. The proposed vehicle access will enable entry and exit of all vehicles in a forward direction.

The proposed driveway would require the removal of four (4) on-street parking spaces however it is noted that there is an existing surplus of 10 on-street parking spaces based on the surveys undertaken.

The site access, car park, internal circulation and loading should be designed to comply with the following relevant Australian Standards:

- *AS2890.1:2004 for car parking areas;*
- *AS2890.2:2018 for commercial vehicle loading areas;*
- *AS2890.3:2015 for bicycle parking areas;* and
- *AS2890.6:2009 for accessible spaces.*

The largest vehicle will be a 20m AV in which the proposed development has been designed to accommodate. Swept path assessments are provided in Appendix A of **Appendix 42**. All site loading will be performed at the rear of the Subject Site. A 6m x 16m fire appliance hard stand area will be provided at the western corner of the Subject Site.

6.1.3.3 Management and/or Mitigation Measures

A Construction Traffic Management Plan (CTMP) will be required as part of the Construction Management Plan (CMP) for the proposed development, as documented in planned management and mitigation measures described in **Appendix E** of this EIS. It is noted that a Preliminary CTMP has been prepared and provided in **Appendix 42**, which will be further detailed and finalised to satisfy any relevant conditions of consent.

A Preliminary Green Travel Plan (GTP) is provided in **Appendix 42** which is intended to:

- Identify objectives and modes share targets (i.e., site and land use specific, measurable, and achievable and timeframes for implementation) to define the direction and purpose of the future GTP;
- Suggest specific tools and actions to help achieve the objectives and mode share targets;
- Suggest measures to promote and support the implementation of the GTP, including financial and human resource requirements, roles and responsibilities for relevant employees involved in the implementation of the future GTP; and
- Suggest a methodology and monitoring/review program to measure the effectiveness of the objectives and mode share targets of the future GTP, including the frequency of monitoring and the requirement for travel surveys to identify travel behaviours at appropriate times.

6.1.4 Noise and Vibration

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

The complete NVIA is included at **Appendix 30** of this EIS.

6.1.4.1 Existing Environment

Sensitive receivers in proximity to the Subject Site include residential, educational, industrial, commercial and active recreational receivers have been identified. The nearest residential receivers to the Subject Site are located approximately 400 meters to the west. The identified receivers within proximity to the Subject Site are show in **Figure 18** below.

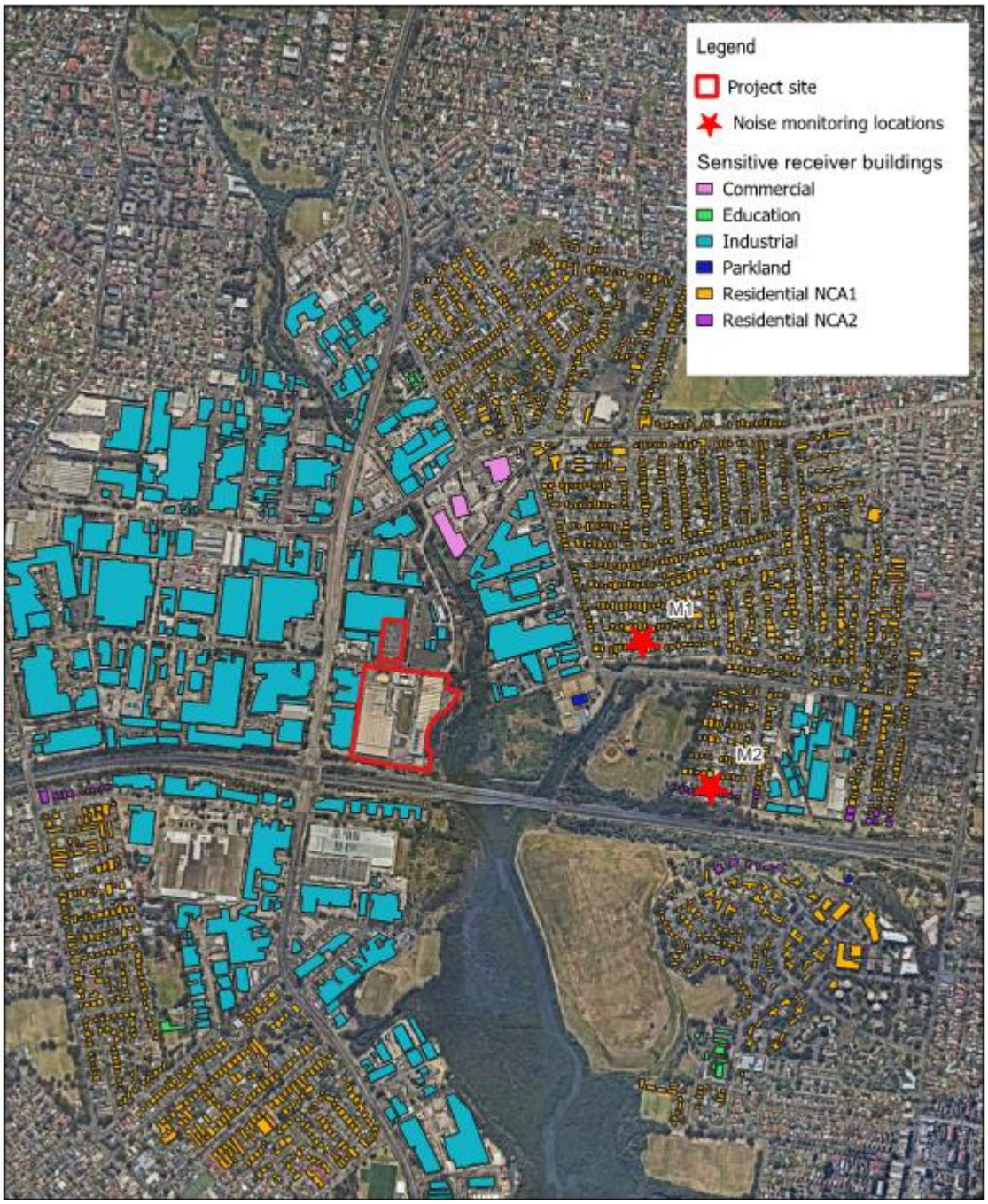


Figure 18. Sensitive Receiver Locations (Source: GHD, 2024)

Noise monitoring was undertaken at those locations identified above, being 21 Craig Street, Punchbowl and 10 Iris Avenue, Riverwood, on 22 July 2024 and 21 August 204 in order to quantify and characterise the existing ambient noise environment across the study area. Those results are presented in **TABLE 28** below.

TABLE 28: UNATTENDED NOISE MONITORING RESULTS							
Location	**Address**	**Rating Background Level[1] $L_{A90(Period)}$ dBA**			**Rating Background Level[1] $L_{Aeq(Period)}$ dBA**		
		Day	**Evening**	**Night**	**Day**	**Evening**	**Night**
M1	21 Craig Street, Punchbowl	46	43 (48)[2]	44	53	53	51
M1	10 Iris Avenue, Riverwood	49	49 (51)[2]	46	57	56	54

[1] The NPfI (EPA, 2017) defines day, evening and night-time periods as:

- Day: 7am to 6pm Monday to Saturday and 8am to 6pm Sunday
- Evening: 6pm to 10pm
- Night: 10pm to 7am Monday to Saturday and 10pm to 8am Sunday.

[2] Where the measured background level is above the RBL of the preceding period, the background noise level of the preceding period is adopted in accordance with the NPfI

Meteorological Conditions

Wind Effects

A thorough review of the vector components of hourly wind data from 2016 to 2022 was undertaken for data from the Bureau of Meteorology (BoM) Bankstown Airport Automatic Weather Station (AWS) (number 066137). The BoM observations are approximately 5km west of the Subject Site.

The analysis identified that significant wind effects were not found to be a feature of the area, as per the NPfI.

Temperature Inversions

Temperature inversions present at Bankstown Airport AWS between 2016 and 2022 exceed the relevant guidelines and warrant consideration in the noise assessment.

Atmospheric Conditions

Adopting an average temperature of 10˚C and average humidity of 70% is generally representative of the atmospheric conditions for environmental noise propagation and is considered appropriate for the purposes of this development.

6.1.4.2 Assessment of Impacts

Construction Nosie

All construction works will be carried out during the daytime only and it is expected that the approval will condition standard construction hours. Standard construction hours per the ICNG are typically Monday to Friday 7.00am to 6.00pm and Saturday 8.00am to 1.00pm.

Potential noise sources during construction include:

- Demolition:
  - Concrete pulveriser;
  - Hydraulic hammer;
  - Excavator;
  - Bulldozer;
  - Trucks;
  - Jack hammer;
  - Air compressor;
- Earthworks and site preparation:
  - Excavator;

  - Bulldozer;
  - Hydraulic hammer;
  - Rock saw;
  - Trucks;
  - Hand tools;
- Construction:
  - Hand tools;
  - Bobcat;
  - Trucks;
  - Concrete works;
  - Cranes; and
  - Hoists.

Assessment of the construction noise levels are predicted to comply with the relevant Noise Management Levels (NMLs) at all residential receivers as shown in **TABLE 29** below. Of the non-residential receivers, exceedances are predicted at the industrial receivers located on Fairford Road and Gow Street. As a worst-case scenario approach was used, the construction noise levels are likely to be lower than the predicted noise levels.

TABLE 29: PREDICTED CONSTRUCTION NOISE LEVELS

Receiver Category		**Number of Receivers Predicted to Exceed the NML**			**Highest Predicted Noise Level ($L_{Aeq(15min)}$ dBA)**		
		CS1	**CS2**	**CS3**	**CS1**	**CS2**	**CS3**
Residential	NCA1	0	0	0	55	56	50
	NCA2	0	0	0	51	52	46
Education		0	0	0	44	45	39
Active Recreation		0	0	0	49	50	45
Commercial		0	0	0	58	59	49
Industrial		3	3	2	99	97	95

Measures to manage construction noise emissions are discussed below.

Construction Vibration

The most vibration intensive activities associated with the construction works are anticipated to be excavation works with an approximately 10t excavator mounted hydraulic hammer. Use of the hydraulic hammer has the potential to exceed the human comfort vibration criteria should these works occur within 7m of residences. No residences are located within 7m of the construction activities and as such no adverse vibration impacts are anticipated as a result of the proposed development.

Hydraulic hammer usage has the potential to exceed the cosmetic damage criteria should these works occur within 2m of a sensitive receiver building. To the west of the Subject Site, industrial receivers are located which could sustain cosmetic damage from vibration impacts.

Measures to mitigate construction vibration are discussed below.

Operational Noise

An operational noise source inventory is provided in **TABLE 30** below.

TABLE 30: OPERATIONAL NOISE SOURCE INVENTORY				
Source Type	**Noise Source**	**Sound Power Level Per Item (dBA)**	**Time Periods**	**Source**
Building Breakout				
Area sources (vertical)	Roof	58dBA/m^2	Continuously	Measurements undertaken on-site
	Facades	44dBA/m^2	Continuously	
	Louvres/openings	79dBA/m^2	Continuously	
Mechanical Equipment				
Point sources	Fume extractor fans	101	Continuously	Measurements undertaken on-site
	Compressor	104	Continuously	
	Exhaust stacks (2x)	104	Continuously	
	Exhaust stack (1x)	108	Continuously	
	Exhaust stacks (2x)	94	Continuously	Specified by proponent
	Dust collection	89	Continuously	
	Compactor	83	Continuously	
	Minibulk pumps	99	Continuously	
	Tinybulk pumps	100	Continuously	
	Compressor, dryer and chiller package	95	Continuously	
Vehicle Movements and Loading Activities				
Moving point source	Heavy vehicles	108 (7 trucks per hour)	Day and evening	Typical emission level
Point sources	Bulk liquid unloading	93	Day and evening	Specified by proponent
	Bulk liquid transfer	96	Continuously	
	Powder truck unloading	104	Day and evening	
Area sources	Forklifts	101	Continuously	Typical emission level

Operational noise contours for the day and evening operations are shown in **Figure 19** below.

Figure 19. Operational Noise Contours (Source: GHD, 2024)

Predicted nose levels at the worst affected residential receivers is shown in **TABLE 31** below which demonstrates that the proposed development would comply with the relevant project amenity noise levels in all time periods.

TABLE 31. PREDICTED OPERATION NOISE LEVELS

Address	NCA	Receiver Category	Project Noise Trigger Level ($L_{Aeq(15min)}$ dBA)		Predicted Noise Level ($L_{Aeq(15min)}$ dBA)		Compliance	
			Daytime and Evening	Nighttime	Daytime and Evening	Nighttime	Daytime and Evening	Nighttime
22 Iris Avenue, Riverwood	NCA2	Residential	48	43	41	41	Yes	Yes
3 Craig Street, Punchbowl	NCA1	Residential	48	43	41	41	Yes	Yes
62 Moxon Road, Punchbowl	NCA1	Residential	48	43	40	40	Yes	Yes
24 Iris Avenue, Riverwood	NCA2	Residential	48	43	38	38	Yes	Yes
44 Kentucky Road, Riverwood	NCA1	Residential	48	43	38	38	Yes	Yes
24 Bryant Steet, Padstow	NCA2	Residential	48	43	36	36	Yes	Yes

As the proposed development is operational 24 hours per day, seven (7) days a week, sleep disturbance impacts have been assessed. The majority of the noise sources are continuous in nature. Potential sources of maximum noise level events that could be emitted from the Subject Site is limited to clattering of forklift spoons during the nighttime period. The SWL of the forklift clattering is estimated to be 11dBA L_{Amax}.

The maximum noise level is predicted to be 37dBA at 12 Iris Avenue, Riverwood. As such, none of the residential receivers are predicted to experience maximum noise levels above 52dBA, and sleep disturbance impacts are not anticipated.

An analysis of annoying noise characteristics was undertaken at the representative receivers and no tonal or low frequency characteristics were found at the residential receivers.

The predicted noise levels comply with the project amenity noise levels in all time periods. In accordance with the NPfI no additional consideration of cumulative industrial noise is required.

Traffic associated with the construction and operation of the proposed development would use Gow Street (local road), Fairford Road (arterial road) and the M5 Motorway (freeway) to access the Subject Site. The M5 Motorway and Fairford Road have significant traffic volumes. An increase in traffic generated during the construction and operation of the proposed development is not anticipated to result in a 2dBA increase at sensitive receivers located along these roads. Gow Street is predominantly used to access industrial sites and has no residential receivers situated along the road. In light of the above, no road noise impacts are anticipated due to the traffic generated from the project during construction and operation

6.1.4.3 Management and/or Mitigation Measures

Construction Management Measures

TABLE 32 below provides an overview of the proposed construction management measures relating to noise and vibration.

TABLE 32: NOISE AND VIBRATION MANAGEMENT MEASURES			
Control Type	**Environmental Safeguard**	**Responsibility**	**Timing**
Community Consultation			
Notification of works	Notification of receivers in the study area will be undertaken a minimum of seven (7) calendar days prior to the start of works and should include information such as total building time, what works are expected to be noisy, their duration and what is being done to minimise noise. Information to neighbours will be provided before and during construction through media such as letterbox drops, meetings or individual contact. All receivers potentially affected by vibration will be notified for each of the relevant construction scenarios.	Contractor	Pre-construction
Community relations	Ensure site managers will periodically check the Subject Site and adjacent sensitive receivers for	Contractor	Pre-construction / construction

	noise impacts so that solutions can be quickly applied. Good communication between the community and project staff will be maintained.		
Management Measures			
Site inductions	All employees, contractors and subcontractors will receive an environmental induction. The induction must at least include: – All noise and vibration mitigation measures – Relevant licence and approval conditions – Permissible hours of work – Any limitations on high noise generating activities – Location of nearest sensitive receivers – Site opening and closing times (including deliveries) – Environmental incident procedures.	Contractor	Construction
Scheduling Activities to Minimise Noise Impacts	All activities on-site will be confined between the hours of 7:00am to 6:00pm from Monday to Friday and 8:00am to 1:00pm on Saturday, with the exception of the following activities: – The delivery of oversized plant or structures – Emergency work to avoid the loss of life or damage to property, or to prevent environmental harm. Simultaneous operation of noise and vibration intensive equipment will be prevented as much as reasonably possible.	Contractor	Pre-construction / construction
Construction environmental management plans	The construction environmental management plan must be regularly updated to account for changes in noise and vibration management issues and strategies.	Contractor	Pre-construction / construction
Source Mitigation Measures			
Plant noise levels	The construction environmental management plan must be regularly updated to account for changes in noise and vibration management issues and strategies.	Contractor	Pre-construction / construction
Plant vibration levels	Vibratory intensive works should be undertaken at minimum 2m from adjacent industrial structures. If vibratory works are required to be undertaken within 2m of adjacent industrial structures, less vibratory intensive methods will be implemented to prevent cosmetic damage impacts	Contractor	Pre-construction / construction

Maintain equipment	Equipment will be regularly inspected and maintained to ensure it is in good working order. Condition of mufflers will be checked. Equipment must not be operated until it is maintained or repaired, where maintenance or repair would address the annoying character of noise identified.	Contractor	Construction

Subject to the implementation of the above, no exceedances of the project noise trigger levels are predicted.

Operational Mitigation Measures

As no exceedances of the project noise trigger levels are predicted, no additional mitigation is required.

6.1.5 Air Quality and Odour

An Air Quality Impact Assessment (AQIA) has been prepared by Northstar Air Quality and is provided in **Appendix 5**.

6.1.5.1 Existing Environment

Sensitive Receptor Locations

The focus of the AQIA has been on discrete receptor locations, which are specified in consideration of the Approved Methods stipulated by NSW EPA and are broadly representative of those areas or sites that may experience the greatest or most likely levels of exposure on account of the proposed development. The receptors adopted for use within the AQIA are presented in **TABLE 33** and illustrated in **Figure 20**.

TABLE 33: SENSITIVE RECEPTOR LOCATIONS

Receptor ID	Address	Land Use Description	Coordinates	
			mE	mS
R1	Fairford Road, Padstow	Industrial	318 535	6 242 906
R2	Moxon Road, Punchbowl	Industrial	318 959	6 242 955
R3	Gow Street, Padstow	Industrial	318 603	6 243 035
R4	Gow Street, Padstow	Industrial	318 766	6 243 051
R5	Fairford Road, Padstow	Industrial	318 427	6 242 849
R6	Fairford Road, Padstow	Industrial	318 442	6 242 990
R7	Gow Street, Padstow	Industrial	318 403	6 243 131
R8	Bryant Street, Padstow	Industrial	318 600	6 242 634
R9	Bryant Street, Padstow	Industrial	318 399	6 242 656
R10	Moxon Road, Punchbowl	Recreational	319 119	6 242 882
R11	Moxon Road, Punchbowl	Industrial	318 930	6 243 043
R12	Short Street, Bankstown	Industrial	318 637	6 243 230
R13	Craig Steet, Punchbowl	Residential	319 200	6 234 040
R14	Moxon Road, Punchbowl	Residential	319 126	6 243 274
R15	Kentucky Road, Riverwood	Recreational	319 248	6 243 775

R16	Canterbury Road, Bankstown	Industrial	318 464	6 243 255
R17	Moxon Road, Punchbowl	Recreational	318 991	6 242 788
R18	Kentucky Road Riverwood	Recreational	319 067	6 242 485

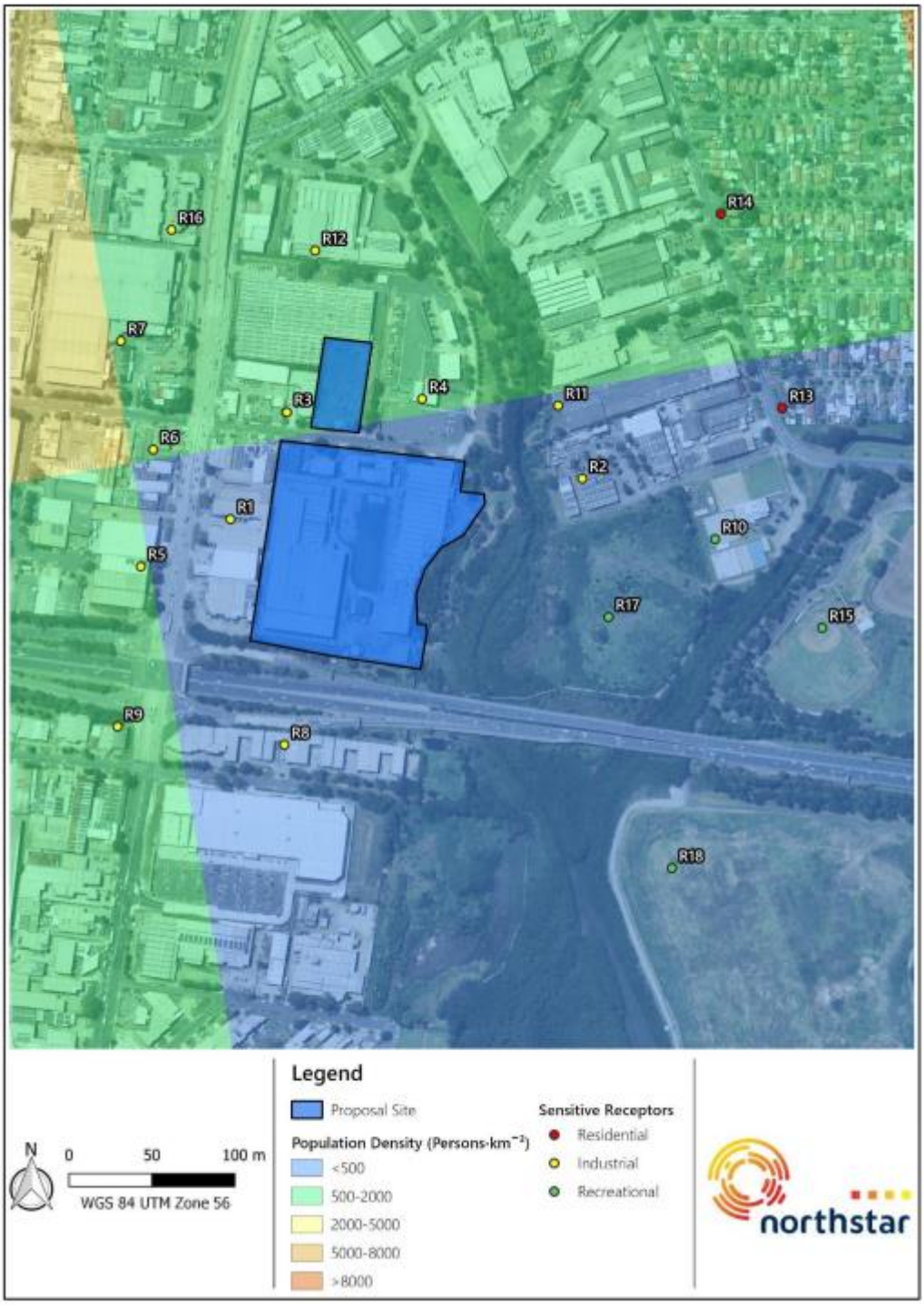


Figure 20. Sensitive Receptor Locations (Source: Northstar, 2024)

Meteorology

The meteorological conditions found within the surrounding locality of the Subject Site have been characterised using data collected by the BoM at surrounding AWS. Meteorological conditions measured at the Bankstown Airport AWS are presented in Appendix C of **Appendix 5** and are considered representative of the Subject Site due to its proximity (5.3km from the Subject Site.

Background Air Quality

Air Quality monitoring from Lidcombe for the year 2021, which corresponds to the adopted meteorological modelling year has been used for background air quality. Appendix D of **Appendix 5** provides a detailed summary of the adopted background air quality monitoring data.

Topography

The topography between the Subject Site and identified sensitive receptor locations is relatively consistent with elevation variances of less than 15m within the immediate locality.

Potential for Cumulative Impacts

Nine (9) facilities within a 3km radius of the Subject Stie were found to be of a similar emissions profile that may potentially result in cumulative impacts at nearby sensitive receptor locations. Publicly available air quality assessment documents could not be found for the other facilities as such, a quantitative assessment of potential cumulative impacts with the proposed development at surrounding land uses cannot be performed. In any case, and as previously noted, the Approved Methods requires the assessment of incremental impacts associated with individual toxic and odorous air pollutants. Given the discussion provided above, cumulative impacts have been considered within the adoption of the background air quality monitoring data discussed above.

6.1.5.2 Assessment of Impacts

Construction Phase

Construction phase activities have the potential to generate short-term emissions of particulates. Generally, these are associated with uncontrolled (or 'fugitive') emissions and are typically experienced by neighbours as amenity impacts, such as dust deposition and visible dust plumes, rather than associated with health-related impacts. Localised engine-exhaust emissions from construction machinery and vehicles may also be experienced, but given the scale of the proposed works, fugitive dust emissions would have the greatest potential to give rise to downwind air quality impacts.

Modelling of dust from construction sites is generally not considered appropriate, as there is a lack of reliable emission factors from construction activities upon which to make predictive assessments, and the rates would vary significantly, depending upon local conditions. In lieu of a modelling assessment, the construction-phase impacts associated with the proposed development have been assessed using a risk-based assessment procedure. The advantage of this approach is that it determines the activities that pose the greatest risk, which allows the CMP to focus controls to manage that risk appropriately and reduce the impact through proactive management.

For the assessment of the construction phase, the methodology presented in *Guidance on the Assessment of Dust from Demolition and Construction* developed in the United Kingdom by the Institute of Air Quality Management (IAQM) has been adopted.

Given the sensitivity of the identified receptors is classified as high for dust soiling, low for health effects and the dust emission magnitudes for the various construction phase activities, the resulting risk of air quality impacts (without mitigation) is provided in **TABLE 34** below.

TABLE 34: RISK OF AIR QUALITY IMPACTS FROM CONSTRUCTION ACTIVITIES										
Sensitivity of Area	**Dust Emission Magnitude**					**Preliminary Risk**				
	Demolition	**Earthworks**	**Construction**	**Track-Out**	**Construction Traffic**	**Demolition**	**Earthworks**	**Construction**	**Track-Out**	**Construction Traffic**
Dust Soiling Impacts										
High	Med.	Small	Large	Med.	Large	Med.	Low	Med.	Med.	Med.
Human Health Impacts										
Low	Med.	Small	Large	Med.	Large	Low	Neg.	Low	Low	Low

Following the implementation of the relevant mitigation measures, give the size of the Subject Site, distance to sensitive receptors and the activities to be performed, residual impacts associated with fugitive dust emissions from the proposed development would be anticipated to be negligible.

Operational Phase

The predicted annual average particulate matter concentrations (as TSP, PM_{10} and $PM_{2.5}$) resulting from the proposed operations are presented in **TABLE 35** below.

TABLE 35: PREDICTED ANNUAL AVERAGE TSP, PM_{10} AND $PM_{2.5}$ CONCENTRATIONS									
Receptor	**Annual Average Concentration (ug m^{-3})**								
	TSP			**PM_{10}**			**$PM_{2.5}$**		
	Incr.	**Bg.**	**Cumul.**	**Incr.**	**Bg.**	**Cumul.**	**Incr.**	**Bg.**	**Cumul.**
Criterion	90			25			8		
Max. %	0.4	35,8	36.2	1.3	62.8	64.1	0.1	76.3	76.9
R1	0.3	32.2	32.5	0.3	15.7	16.0	< 0.1	6.1	6.2
R2	0.3	32.2	32.5	0.3	15.7	16.0	< 0.1	6.1	6.2
R3	0.3	32.2	32.5	0.3	15.7	16.01	< 0.1	6.1	6.2
R4	0.3	32.2	32.5	0.3	15.7	16.0	< 0.1	6.1	6.2
R5	0.2	32.2	32.4	0.1	15.7	15.8	< 0.1	6.1	6.2
R6	0.1	32.2	32.3	0.1	15.7	15.8	< 0.1	6.1	6.2
R7	0.1	32.2	32.3	< 0.1	15.7	15.8	< 0.1	6.1	6.2
R8	0.2	32.2	32.4	0.2	15.7	15.9	< 0.1	6.1	6.2
R9	0.1	32.2	32.3	0.1	15.7	15.8	< 0.1	6.1	6.2
R10	0.2	32.2	32.4	0.2	15.7	15.9	< 0.1	6.1	6.2
R11	0.2	32.2	32.4	0.2	15.7	15.9	< 0.1	6.1	6.2
R12	0.1	32.2	32.3	0.1	15.7	15.8	< 0.1	6.1	6.2
R13	0.1	32.2	32.3	0.1	15.7	15.8	< 0.1	6.1	6.2
R14	< 0.1	32.2	32.3	< 0.1	15.7	15.8	< 0.1	6.1	6.2
R15	0.1	32.2	32.3	0.1	15.7	15.8	< 0.1	6.1	6.2
R16	< 0.1	32.2	32.3	< 0.1	15.7	15.8	< 0.1	6.1	6.2
R17	0.2	32.2	32.4	0.2	15.7	15.9	< 0.1	6.1	6.2
R18	< 0.1	32.2	32.3	< 0.1	15.7	15.8	< 0.1	6.1	6.2

Note: Incr. = Incremental Impact, Bg. = Background, Cumul. = Cumulative Impact

The predicted incremental concentrations of TSP, PM_{10} and $PM_{2.5}$ at all receptor locations are low and are not predicted to result in any exceedances of the cumulative criteria. No contour plots of annual average TSP, PM_{10} and $PM_{2.5}$ concentrations are presented, given the minor predicted contribution from the proposed operations at the nearest sensitive receptors.

The annual average dust deposition predicted due to the proposed operations are provided in **TABLE 36** below.

TABLE 36: PREDICTED ANNUAL AVERAGE DUST DEPOSITION RATES

Receptor	Annual Average Dust Deposition (g $m^{-2}month^{-1}$)		
	Incremental Impact	Background	Cumulative Impact
Criterion	2	-	4
Max. %	< 0.1	-	51.3
R1	< 0.1	2.0	< 2.1
R2	< 0.1	2.0	< 2.1
R3	< 0.1	2.0	< 2.1
R4	< 0.1	2.0	< 2.1
R5	< 0.1	2.0	< 2.1
R6	< 0.1	2.0	< 2.1
R7	< 0.1	2.0	< 2.1
R8	< 0.1	2.0	< 2.1
R9	< 0.1	2.0	< 2.1
R10	< 0.1	2.0	< 2.1
R11	< 0.1	2.0	< 2.1
R12	< 0.1	2.0	< 2.1
R13	< 0.1	2.0	< 2.1
R14	< 0.1	2.0	< 2.1
R15	< 0.1	2.0	< 2.1
R16	< 0.1	2.0	< 2.1
R17	< 0.1	2.0	< 2.1
R18	< 0.1	2.0	< 2.1

An assumed background dust deposition of $2g{\cdot}m^{-2}{\cdot}month^{-1}$ is presented above, although comparison of the incremental concentration with the incremental criterion of $2g{\cdot}m^{-2}{\cdot}month^{-1}$ is also valid. In either case, the resulting conclusions drawn are identical. No exceedances of either the incremental or cumulative dust deposition criteria are predicted as a result of the proposed operations. No contour plots of annual average dust deposition are presented, given the minor predicted contribution from the proposed operations at the nearest sensitive receptors.

TABLE 37 below presents the maximum 24-hour average PM_{10} and PM2.5 concentrations predicted to occur at the nearest receptors, as a result of the proposed operations. No background concentrations are included.

TABLE 37: PREDICTED MAXIMUM INCREMENTAL 24-HOUR PM_{10} AND $PM_{2.5}$ CONCENTRATIONS		
Receptor	**Maximum 24-Hour Average Concentration (ug m^{-3})**	
	PM_{10}	**$PM_{2.5}$**
Criterion	50	25
Max. %	6.7	< 0.4
R1	3.3	< 0.1
R2	1.8	< 0.1
R3	2.4	< 0.1
R4	2.4	< 0.1
R5	1.4	< 0.1
R6	1.6	< 0.1
R7	1.3	< 0.1
R8	1.5	< 0.1
R9	1.2	< 0.1
R10	1.3	< 0.1
R11	1.5	< 0.1
R12	1.4	< 0.1
R13	1.0	< 0.1
R14	0.5	< 0.1
R15	0.6	< 0.1
R16	0.8	< 0.1
R17	1.2	< 0.1
R18	1.2	< 0.1

TABLE 38 and **TABLE 39** present the predicted maximum 24-hour average PM_{10} and $PM_{2.5}$ concentrations resulting from the operation of the proposed development, with background included.

TABLE 38: SUMMARY OF CONTEMPORANEOUS IMPACT AND BACKGROUND – PM_{10}							
Date	**24-Hour Average PM_{10} Concentration (ug m^{-3}) – Receptor R3**			**Date**	**24-Hour Average PM_{10} Concentration (ug m^{-3}) – Receptor R1**		
	Incr.	**Bg.**	**Cumul.**		**Incr.**	**Bg.**	**Cumul.**
04/05/2021	1.0	39.2	40.1	19/02/2021	3.3	18.3	21.6
27/04/2021	0.7	37.8	48.5	05/11/2021	3.2	9.7	12.9
23/01/2021	< 0.1	36.4	36.5	26/06/2021	2.7	13.4	16.1
03/05/2021	< 0.1	36.2	36.3	21/03/2021	2.6	20.5	23.1
30/04/2021	0.2	34.5	34.7	01/12/2021	2.5	6.4	8.9
15/01/2021	0.2	33.1	33.3	22/03/2021	2.5	7.2	9.7
21/08/2021	< 0.1	33.1	33.2	03/01/2021	2.5	10.3	12.8
29/10/2021	< 0.1	31.9	32.0	17/03/2021	2.4	14.3	16.7
09/10/2021	< 0.1	31.8	31.9	29/01/2021	2.3	10.9	13.2
03/06/2021	< 0.1	31.7	31.8	13/10/2021	2.1	10.6	12.7
These data represent the highest Cumulative Impact 24-hour PM_{10} predictions (outlined in red) as a result of the proposed operations				These data represent the highest Incremental Impact 24-hour PM_{10} predictions (outlined blue) as a result of the proposed operations			

TABLE 39: SUMMARY OF CONTEMPORANEOUS IMPACT AND BACKGROUND – $PM_{2.5}$							
Date	**24-Hour Average $PM_{2.5}$ Concentration (ug m^{-3}) – Receptor R3**			**Date**	**24-Hour Average $PM_{2.5}$ Concentration (ug m^{-3}) – Receptor R1**		
	Incr.	**Bg.**	**Cumul.**		**Incr.**	**Bg.**	**Cumul.**
04/05/2021	< 0.1	31.5	31.6	19/02/2021	< 0.1	3.0	3.1
27/04/2021	< 0.1	26.2	26.3	05/11/2021	< 0.1	3.1	3.2
23/01/2021	< 0.1	25.6	25.7	26/06/2021	< 0.1	5.3	5.4
03/05/2021	< 0.1	24.8	24.9	21/03/2021	< 0.1	5.4	5.5
30/04/2021	< 0.1	23.9	24.0	01/12/2021	< 0.1	2.3	2.4
15/01/2021	< 0.1	21.8	21.9	22/03/2021	< 0.1	1.0	1.1
21/08/2021	< 0.1	19.4	19.5	03/01/2021	< 0.1	3.5	3.6
29/10/2021	< 0.1	17.5	17.6	17/03/2021	< 0.1	4.4	4.6
09/10/2021	< 0.1	16.8	16.9	29/01/2021	< 0.1	0.9	1.0
03/06/2021	< 0.1	16.3	16.4	13/10/2021	< 0.1	1.3	1.4
These data represent the highest Cumulative Impact 24-hour PM_{10} predictions (outlined in red) as a result of the proposed operations				These data represent the highest Incremental Impact 24-hour PM_{10} predictions (outlined blue) as a result of the proposed operations			

Results are presented for the receptor with the highest predicted incremental PM_{10} and $PM_{2.5}$ impacts, as well as for the receptors with the highest cumulative impacts (increment plus background). These receptors may differ from those showing the highest incremental impacts.

The left side of the tables show the predicted concentration on days with the highest cumulative impact (principally driven by the highest background concentrations), and the right side shows the total predicted concentration on days with the highest predicted incremental concentrations with the contemporaneous background values to derive the respective cumulative predictions.

TABLE 39 indicates that there were three (3) days when the 24-hour $PM_{2.5}$ criterion was exceeded at the Lidcombe AQMS. According to the NSW Annual Compliance Report for 2021, these exceedances were attributed to hazard reduction burning activities across the Sydney region and were classified as exceptional events.

No additional exceedances of the PM_{10} or $PM_{2.5}$ criteria are predicted as a result of the proposed operation. Any exceedances of the $PM_{2.5}$ criterion are a result of already exceeding background conditions, and the proposed development is anticipated to contribute a negligible impact on those days.

All Other Pollutants

TABLE 40 presents the predicted ground level concentrations associated with the proposed operations for all other pollutants assessed. The assessment criteria for all pollutants presented in this section are associated with an averaging period of 1-hour. In accordance with the Approved Methods the 99.9th percentile incremental impact is compared to the relevant criterion. No exceedances of the criteria are predicted as a result of the proposed operation. It is noted that these predicted impacts are highly conservative.

TABLE 40: PREDICTED INCREMENTAL CONCENTRATIONS OF TOXIC AND ODEROUS AIR POLLUTANTS

Receptor	99.9th Percentile 1-Hour Average Concentration (mg m^{-3})			
	Ammonia	Cyclohexane	Ethanol	Propylene Glycol Monomethyl Ether
Criterion	0.33	0.26	2.1	6.6
Max. %	10.3	34.2	0.4	1.0
R1	0.03	0.12	0.01	0.06
R2	0.02	0.06	< 0.01	0.02
R3	0.02	0.06	0.01	0.02
R4	0.02	0.07	< 0.01	0.03
R5	0.02	0.04	< 0.01	0.03
R6	0.02	0.05	< 0.01	0.02
R7	0.01	0.04	< 0.01	0.01
R8	0.03	0.05	< 0.01	0.04
R9	0.02	0.04	< 0.01	0.02
R10	0.01	0.04	< 0.01	0.02
R11	0.02	0.06	< 0.01	0.02
R12	0.01	0.04	< 0.01	0.01
R13	0.01	0.04	< 0.01	0.01
R14	0.01	0.03	< 0.01	0.01
R15	0.01	0.04	< 0.01	0.01
R16	0.01	0.03	< 0.01	0.01
R17	0.02	0.05	< 0.01	0.02
R18	0.01	0.04	< 0.01	0.01

The results of the dispersion modelling assessment indicate that:

- Annual average TSP, PM_{10} and $PM_{2.5}$ concentrations are all predicted to be achieved at surrounding receptor locations, even with the addition of existing background concentrations;
- Annual average monthly dust deposition rates are predicted to be below the relevant criteria, both as an incremental and cumulative impact;
- Cumulative 24-hour maximum PM_{10} concentrations are predicted to be achieved at all surrounding receptor locations;
- No additional exceedances of the cumulative 24-hour maximum $PM_{2.5}$ criterion are predicted as a result of the proposed operations. Exceedances are due to already exceeding background concentrations which are not contributed to by the proposed development; and
- One-hour criteria for identified toxic and odorous air pollutants resulting from the operation of the proposed development are well below the respective criteria, even adopting conservative assumptions relating to emissions estimation.

6.1.5.3 Management and/or Mitigation Measures

Construction Phase

A number of mitigation measures are identified Appendix B of **Appendix 5** which will be implemented into the CMP relating to:

- Communications;
- Site Management;
- Monitoring;
- Preparing and maintaining the Subject Site;
- Vehicle/machinery operation and sustainable travel; and
- Operations

Operational Phase

A range of management and mitigation measures will be adopted during the operational phase including:

- Maintenance of all areas of the Subject Site (external and internal) to be clean and well maintained;
- The provision of spill kits to contain and promptly clean-up any loss of containment of liquids and powders;
- Ports on all discharge points to comply (where possible) with *AS/NZS 4323.1*;
- Breakthrough alarm on the dust collector servicing emission point C, such as differential pressure gauges to provide alarms of baghouse blockage and/or breakthrough;
- Lower explosive limit (LEL) alarms in all workspaces to provide visible and audible alarms of vapour loss;
- Nuisance dust alarms in all workspaces set to 50 % of the Safe Work Australia nuisance dust concentration of 10mg·m^{-3} (i.e. alarm set to 5mg·m^{-3}) and
- The preparation of an odour management plan/complaint procedure to record and action verified odour complaints in a systemic, auditable and pro-active manner.

Monitoring

An emissions testing program will commence within 60 days of commissioning by a NATA accredited testing company.

6.1.6 Water Management

A Civil Engineering Report has been prepared by CostinRoe Consulting and is provided in **Appendix 13** of this EIS which incorporates an Integrated Water Cycle Management Strategy. Consideration of the wastewater arrangement has been undertaken in the Operational Waste Management Plan prepared by LG Consult and Hydraulic Services Trade Waste Report which are provided in **Appendices 27** and **31** of this EIS.

6.1.6.1 Existing Environment

Groundwater

Groundwater has been identified between 1.7m to 4.1 below ground level during drilling activities at the Subject Site. A standpipe piezometer has also been installed on-site and groundwater was observed at a depth 3.4m below ground near the centre of the Subject Site.

Existing Site Drainage

An existing formal inground drainage system is currently on-site which carries stormwater runoff from the existing warehouse and surrounds offsite to Salt Pan Creek. The existing discharge points on the Subject Site is in the north-east and south-east corners, into Salt Pan Creek. The existing site drainage system will be primarily maintained and integrated with the new proposed development. No new discharge points are proposed as part of this development into the receiving creek system.

Existing Stormwater System Sub-Catchments

The stormwater over the existing development can be classified into four (4) sub-catchment areas being roadways, landscape areas, roofs and bunded areas. The stormwater system for each is outlined below:

- Roadway areas

  Rainfall over the entrance and exit driveways drains to Gow Street, ultimately discharging to Salt Pan Creek; and rainfall over the general roadways within the Subject Site drains to Site Containment Tank (SCT) in the south east of the Subject Site prior to discharge to Salt Pan Creek as shown in **Figure 21** below.

- Landscape areas

  Rainfall over the landscaped areas at the front of the Subject Site drains to Gow Street, ultimately discharging to Salt Pan Creek; and rainfall over the grassed area in the middle of the Subject Site drains to the SCT via the general roadways as shown in **Figure 21** below.

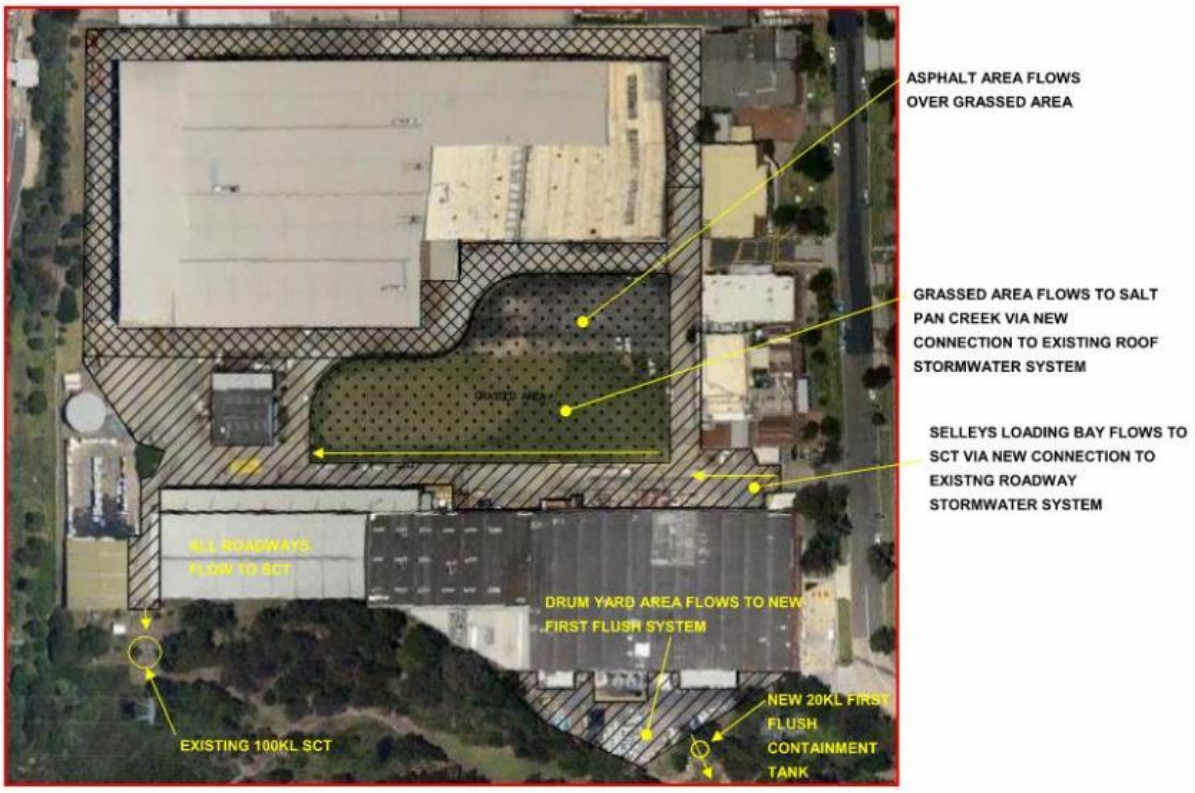


Figure 21. Existing Roadway and Landscape Areas Stormwater System (Source: Costin Roe, 2024)

- Roof areas

Rainfall over the canteen, office and reception building drain to Gow Street, ultimately discharging to Salt Pan Creek. Rainfall over the paint mill, warehouse, workshop, dangerous goods store, packaging store and engineering building discharges directly to Salt Pan Creek (bypassing the SCT) via Pit 18 at the south east of the Subject Site. Rainfall over the factory drains under the drum yard directly to Salt Pan Creek as shown in **Figure 22** below.

Figure 22. Existing Roof Areas Stormwater System (Source: Costin Roe, 2024)

- Bunded Areas

The diesel tank and linseed oil tank bunds are manually pumped through an oil water separator in the plant services room before the water is discharged to sewer. The workshop bund is manually pumped through an oil water separator in the workshop before the water is discharged to sewer as shown in **Figure 23** below.

The bunded areas listed below are tested for the following parameters:

- Odour test for chlorine;
- 7.0 ≤ pH ≤ 8.5;
- Turbidity < 20 NTU's; and
- Hydrocarbons/styrene <1ppm.

If the above criteria are met, the water is discharged to Salt Pan Creek. If one of the criteria is exceeded the water is either manually treated in-situ to bring within acceptable limits or tankered offsite to a treatment facility.

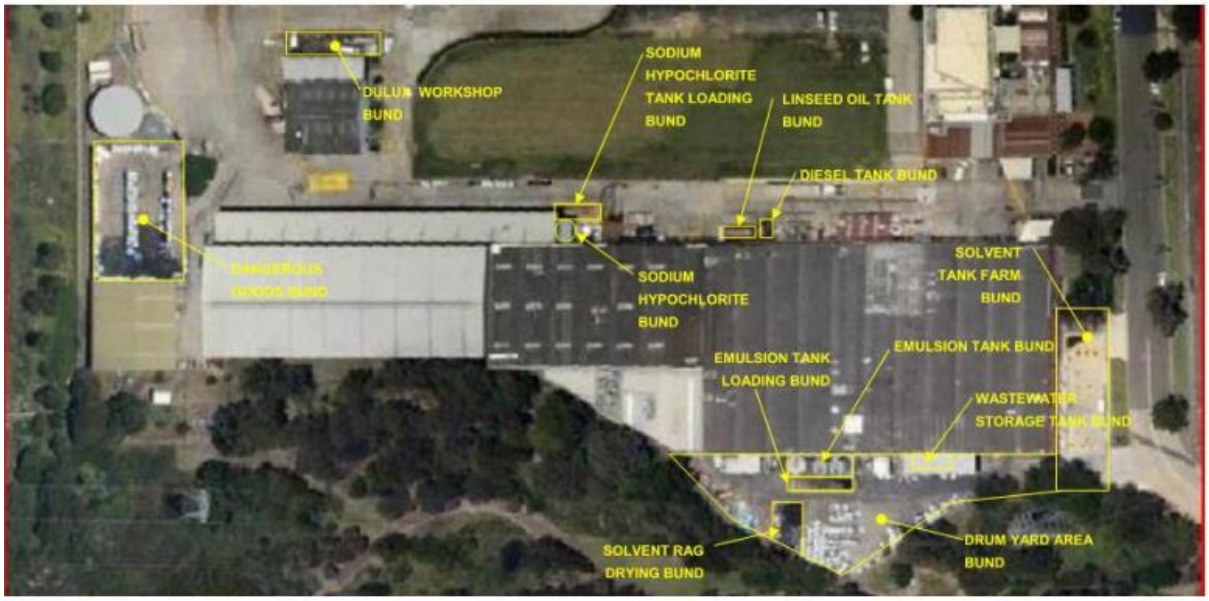


Figure 23. Existing Bunded Areas Stormwater System (Source: Costin Roe, 2024)

Wastewater

Currently, the trade wastewater is treated to prescribed standard then discharged to the sewer under existing Sydney Water Consent to Discharge Industrial Trade Wastewater, which specifies the following maximum discharge rates to sewer:

- Instantaneous maximum rate of pumped discharge: 1.110L/s;
- Maximum daily discharge: 40kL; and
- Average daily discharge: 15kL.

6.1.6.2 Assessment of Impacts

Key Areas and Objectives

Water Cycle Management (WCM) is a holistic approach that addresses competing demands placed on a region's water resources, whilst optimising the social and economic benefits of development in addition to enhancing and protecting the environmental values of receiving waters. They key targets of the WCM are detailed in **TABLE 41** below.

TABLE 415: WCM TARGETS

Element	Target	Document Reference
Water Quantity	Minimise flooding from increased stormwater runoff due to development	CBCP2023
Water Quality	Grease and oil interceptor traps to be installed within piped drainage system	CBCP2023
Water Supply	Reduce Demand on non-potable water uses. Provide 50-70% reduction of non-potable uses.	-

Construction Stormwater Management	A construction stormwater management plan must be described in the environmental assessment for all stages of construction to mitigate potential impacts to surrounding properties.	Landcom Blue Book & CBCP2023

Groundwater

As there is limited excavation required for the redevelopment and the Subject Site is currently developed, impact from groundwater and on groundwater systems are considered negligible.

The development does not propose to utilise surface or groundwater resources and therefore an assessment of the impact on these items is not relevant for the proposed development construction.

Surface water management, including conveyance of surface runoff, management of water quantity and water quality (using Water Sensitive Urban Design (WSUD) principles and best practice pollution reduction objective) has been proposed.

Proposed Surface Water Drainage System

As per general engineering practice and the guidelines of Council, the proposed stormwater drainage system for the development will comprise a minor and major system to safely and efficiently convey collected stormwater run-off from the development to the legal point of discharge.

The minor system is to consist of a piped drainage system which has been designed to accommodate the 1 in 20-year ARI storm event (Q20). This results in the piped system being able to convey all stormwater runoff up to and including the Q20 event.

The major system will be designed to cater for storms up to and including the 1 in 100-yearARI storm event (Q100). The major system will employ the use of defined overland flow paths, such as roads and open channels, to safely convey excess run-off from the Subject Site.

The design of the stormwater system for the Subject Site will be based on relevant national design guidelines, Australian Standard Codes of Practice, the standards of Council and accepted engineering practice. Runoff from buildings will generally be designed in accordance with *AS 3500.3 National Plumbing and Drainage Code Part 3 – Stormwater Drainage*. Overall site runoff and stormwater management will generally be designed in accordance with the Institution of Engineers, Australia publication *"Australian Rainfall and Runoff" (2019Edition), Volumes 1 and 2 (AR&R)*.

Water quality and re-use are to be considered in the design to ensure that any increase in the detrimental effects of pollution is mitigated, Council Water Quality Objectives are met and that the demand on potable water resources is reduced.

The existing stormwater management system on-site is proposed to be maintained as part of this development. All new roadways and landscape areas are to be drained to the existing triple interceptor pit and site containment tank (SCT) while all new roof areas are to discharge directly to Salt Pan Creek.

The SCT is provided to act as a first flush system to contain the first 10mm of rainfall over the catchment areas with potential for contamination of runoff as recommended in the Department of Environment, Climate Change and Water's (DECCW) criteria for first flush containment capacity.

The legal point of discharge for the Subject Site is into Salt Pan Creek. With reference to the Civil Plans provided in **Appendix 12**, the drainage system proposed can be described as follows:

- In-ground piped drainage system designed to the 5% AEP (1 in 20yr ARI);

- Primary treatment of external areas will be made via proposed pit baskets fitting within the stormwater collection pits;
- Secondary treatment of stormwater of non-roofed area surface via an existing triple interceptor pit and site containment tank; and
- Site discharge via the existing Salt Pan Creek.

Wastewater

It is anticipated that a second (parallel) Trade Waste system will be necessary due to location of existing Trade Waste outlet. It is also anticipated that a new Trade Waste Agreement will be necessary based on increased volumes.

Trade wastewater is expected to be generated from the following separate areas:

- Trade Waste, treated water from process cleaning, controlled bund pump outs if deemed contaminated, spills etc, draining of process water, chilled water, blow down from vacuum etc.;
- Process stormwater that can be cleaned or contaminated from roads, paths, controlled bund pump out if deemed clean, all of which are directed to the site-controlled collection system;
- Roof stormwater, clean water that can exit the Subject Site untreated; and
- Domestic sewer, namely effluent from kitchen, showers, sinks, hand basins, toilets etc.

The estimated waste water from the Subject Site is 64.6kL/day. A 225mm Sydney Water sewer asset exists along the southern boundary of the Subject Site is deemed an appropriate size to accommodate this.

Hydrological Modelling & Analysis

Rainfall intensity Frequency Duration (IFD) data used as a basis for DRAINS modelling and initial pipe sizing based on rational method assessments for the 2 to 100 Year ARI events, was taken from The Bureau of Meteorology Online IFD Tool.

In accordance with the recommendations and standards of Council, the calculation of the runoff from storms of the design ARI will be calculated with the catchment modelling software DRAINS for internal drainage only as part of future detail designs. Detailed hydraulic assessment of the internal drainage system will be calculated at detail/ construction certificate stage.

Hydraulics

Hydraulic calculations will be carried out utilising DRAINS modelling software during the detail design stage to ensure that all surface and subsurface drainage systems perform to or exceed the required standard.

<u>Freeboard</u>

The calculated water surface level in open junctions of the piped stormwater system will not exceed a freeboard level of 150mm below the finished ground/ grate level, for the peak runoff from the Minor System runoff. The calculated water surface for the peak runoff from the Major System runoff will not exceed a freeboard level of 500mm below the finished floor level of the building.

Public Safety

For all areas subject to pedestrian traffic, the product (dV) of the depth of flow d (in m) and the velocity of flow V (in m/s) will be limited to 0.4, for all storms up to the 100-year ARI. For other areas, the dV product will be limited to 0.6 for stability of vehicular traffic (whether parked or in motion) for all storms up to the 100-year ARI.

Inlet Pit Spacing

The spacing of inlets throughout the Subject Site will be such that the depth of flow, for the Major System design storm runoff, will not exceed the top of the kerb (150mm above gutter invert).

Overland Flow (locally within the Subject Site)

Dedicated flow paths have been designed to convey all storms up to and including the100-year ARI. These flow paths will convey stormwater from the Subject Site to the stormwater management systems prior to discharge.

6.1.6.3 Management and/or Mitigation Measures

Water Quantity Management

Pre-Development & Post-Development Peak Flows

In relation to the water runoff assessment, the Subject Site is considered to be predominately comprised of impermeable surfaces.

The post development impervious areas will be slightly higher than pre-development impervious areas. As such, the post-development peak flows will be slightly higher than the pre-development levels. The change in peak flow is negligible and within 3% of pre-development condition. No detention is proposed nor required to limit runoff from the new development as the proposed development will have a negligible impact compared to pre-development runoff levels.

The Subject Site is located in the upper end of the Salt Pan Creek catchment. Local un-attenuated flows will peak in advance of the main flood hydrograph coming from the upstream catchments within the Salt Pan Creek. The combined hydrograph results in double peaks (small initial peak followed by larger extended peak) in the shorter duration storms, which reduces as the storm duration increases. The inclusion of traditional OSD shows that, although local flows would be reduced, the peak of flow from the Subject Site is drawn out over a longer period which coincides with that of the larger and delayed peak flow within the Creek. This results in an overall increase in peak flows; hence, an adverse effect results which confirms that there is no impact without OSD and an impact with OSD.

It is considered that the combined peak flow runoff (from the local catchment and larger Salt Pan Creek catchment) in the Creek will not increase as a result of the development (without traditionally sized on-site detention). Hence the development will not adversely impact flooding upstream or downstream of the property. Based on the assessment it is concluded that additional mitigation measures are not required to mitigate impact associated with water quantity during operational phase of the proposed development.

Stormwater Quality, Reuse and Maintenance

Objectives

There is a need to provide a design which incorporates the principles of WSUD and to target pollutants that are present in the stormwater so as to minimise the adverse impact these pollutants could have on receiving waters and to also meet the requirements specified by Council.

Council has nominated, in Section 6.6 of their *Development Engineering Standards Guide 2023*, the requirements for stormwater quality to be provided for all new developments with reference to such documents as the EPA's *Manual on Managing Urban Stormwater (Treatment Techniques*) and relevant Australian Standards.

Stormwater treatment objectives for industrial sites in the LGA confirm that the following key pollutants should be targeted for this development:

- Coarse and fine sediments;
- Gross pollutants (including organic matter, leaves, rubbish and particles >5mm); and
- Hydrocarbons and oils.

Proposed Treatment System

Developed impervious areas including roof, hardstand, car parking, roads and other extensive impervious areas are required to be treated by the Stormwater Treatment Measures (STM's). The STM's shall be sized according to the whole catchment area of the development. The STM's for the development shall be based on a treatment train approach to ensure that all the objectives above are met.

Components of the treatment train for the development are as follows:

- Primary treatment of external areas will be made via pit baskets fitting within the stormwater collection pits;
- Secondary treatment of external areas will be made via an end-of-line Triple Interceptor Pit and SCT; and
- A portion of the roof will also be treated via rainwater reuse and settlement within the rainwater tank.

Figure 24 below shows the location of the proposed STM which are detailed further in the Civil Plans provided in **Appendix 12**. The proposed water quality treatment system is consistent with the other industrial developments and provides a suitable level of treatment which meets Council's policy.

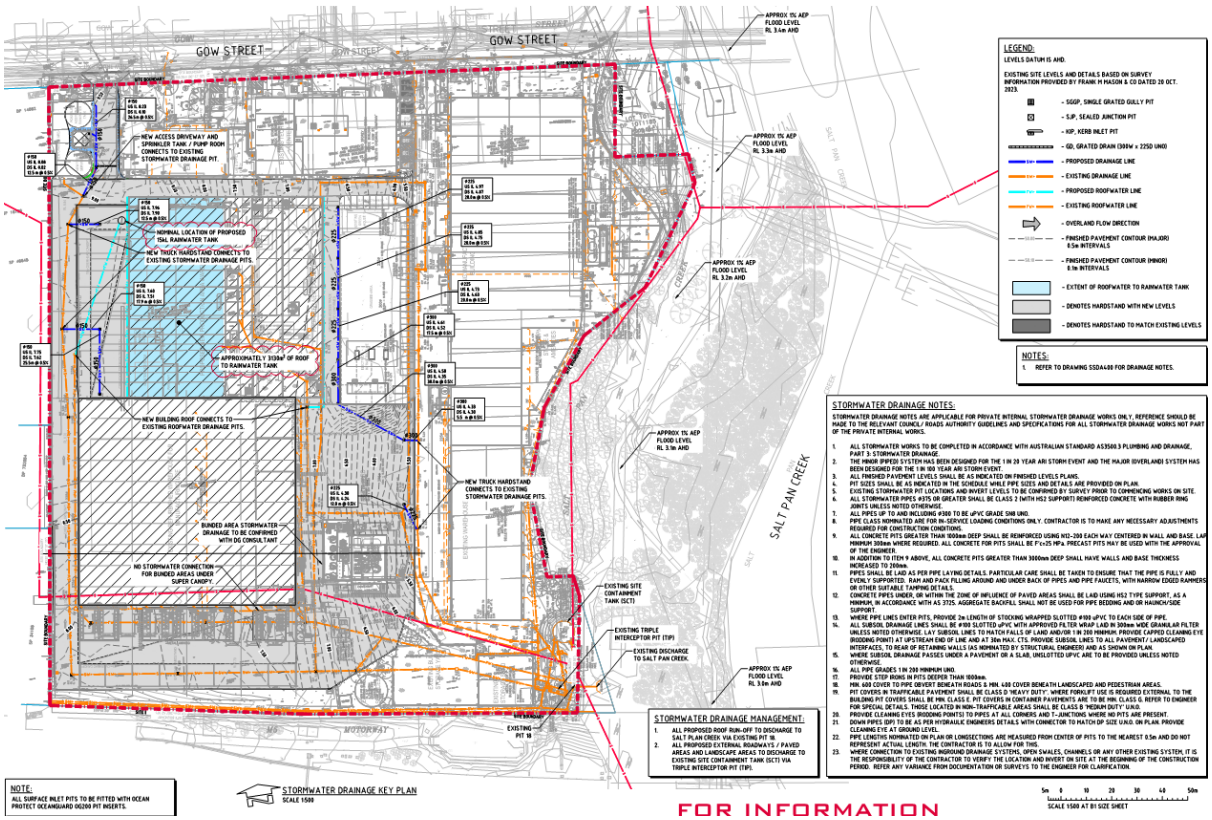


Figure 24. STM Locations (Source: Costin Roe, 2024)

Stormwater Harvesting

Stormwater harvesting refers to the collection of stormwater from the developments internal stormwater drainage system for re-use in non-potable applications. Stormwater from the stormwater drainage system can be classified as either rainwater where the flow is from roof areas, or stormwater where the flow is from all areas of the proposed development.

For the purposes of this development, rainwater harvesting system, where benefits of collected stormwater from roof areas over a stormwater harvesting system can be made as rainwater is generally less polluted than stormwater drainage.

Rainwater harvesting is proposed for the proposed development with re-use for non-potable applications. Internal uses include such applications as toilet flushing while external applications will be used for irrigation. The aim is to reduce the water demand for the development by 50-70%, subject to detailed design.

In general terms the rainwater harvesting system will be an in-line tank for the collection and storage of rainwater. At times when the rainwater storage tank is full, rainwater can pass through the tank and continue to be discharged via gravity into the stormwater drainage system. Rainwater from the storage tank will be pumped for distribution throughout the development in a dedicated non-potable water reticulation system. This however would be subject to future detail design.

Rainwater tanks have been designed, using MUSIC software to balance the supply and demand, based on the below base water demands and to provide 50-70% reduction in non-potable water demand. Rainwater tank reuse demands were calculated based on typical water demands of toilets and irrigation of landscaped areas. Water demands for toilets was calculated using 0.1kL/day/ toilet. Water demands for irrigation of landscaped areas was limited on this development not included as part of the rainwater tank sizing. The above rates result in the following internal non-potable demand:

- 20 Toilets in new laboratory: 2.0kL/day

Rainwater Tank Sizing

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.

Rainwater tanks have been designed, using MUSIC software to balance the supply and demand, based on the calculated base water demands and proposed roof catchment areas. Allowances in the MUSIC model have been made for high flow bypass which will be managed by 300mm downpipe roofwater collection configuration along a portion of the northern elevation of the warehouse.

The MUSIC model, results summarised in **TABLE 42** below, predicts that the reuse demands of 50-70% will be met for the development with the provision of a minimum 15kL rainwater tank. The final configuration and sizing of the rainwater tanks is subject to detail design considerations and optimum site utilisation.

TABLE 42: RAINWATER TANK REUSE REQUIREMENTS

Roof Catchment (m^3)	Highflow Bypass (m^3/s)	Tank Size in MUSIC (kL)	Predicted Demand Reduction (%)	Provided Tank (kL)
3,000	100	15	65	15

Maintenance and Monitoring

It is important that each component of the stormwater system and water quality treatment train is properly operated and maintained. In order to achieve the design treatment objectives, an indicative maintenance schedule has been prepared and included as Appendix C of **Appendix 13** to assist in the effective operation and maintenance of the various water quality components.

Inspection frequency may vary depending on site-specific attributes and rainfall patterns in the area. In addition to the nominated frequency, it is recommended that inspections are made following large storm events.

Construction Water Management

Water Management

Without any mitigation measures and during typical construction activities, site runoff would be expected to convey a significant sediment load. A Soil and Water Management Plan (SWMP), or equivalent, would be implemented for the construction of the Proposal. The SWMP would be developed in accordance with the principles and requirements of *Managing Urban Stormwater – Soils & Construction Volume 1 ('Blue Book')(Landcom, 2004*) with a staged approach.

In accordance with the principles included in the Blue Book, a number of controls have been incorporated into a draft SWMP in Appendix B of **Appendix 13**.

6.1.7 Flooding

A Flood Impact Risk Assessment has been prepared by Costine Roe Consulting and is provided in **Appendix 22** which undertakes an overland flow and flood assessment of the proposed development.

6.1.7.1 Existing Environment

The Subject Site is identified flood prone land. A detailed TUFLOW model of the pre-conditions of the Subject Site has been undertaken in accordance with CBDCP2023 and the *NSW Flood Risk Management Manual 2023*.

The pre-developed model has been prepared utilising the flood levels and hydrographs as completed by Costin Roe, which has been verified against the flood information provided by Council. A range of probabilistic storms has been considered in this FIRA, including the 20%, 5%, 1%, 0.5%, 0.2% AEP and PMF storms. Flood mapping results for all storms are included in Appendix A of **Appendix 23**, including levels and depth, velocity, and hazard mapping.

6.1.7.2 Assessment of Impacts

The assessment has been completed for a range of probabilistic flood events and has compared the pre-development flood conditions to the post-development. Scenario testing has been completed within the bounds and requirements of the specific criteria set out in the CBDCP2023, *NSW Floodplain Risk Management Manual 2023*, and discussions with Council and NSW DPHI.

The criteria as adopted in the assessment to confirm that the developed conditions do not result in affectation of upstream, downstream or adjacent properties as follows:

- Flood levels are not increased by more than 0.01m by the proposed filling;
- Downstream velocities are not increased by more than 10% by the proposed filling;
- The proposed development does not redistribute flows by more than 15%;
- The potential for cumulative effects of possible filling proposals in that area is minimal;
- There are alternative opportunities for flood storage;
- The development potential of surrounding properties is not adversely affected by the proposal;
- The flood liability of buildings on surrounding properties is not increased;
- No local drainage flow/runoff problems are created by the proposal; and
- The proposed development does not occur within Floodway Corridor areas.

It is noted that the proposed development does not involve any built form development within the 1% AEP Salt Pan Creek flood extent.

An assessment has been undertaken for the effect of climate change on the development which takes into consideration potential effect from increased rainfall intensity and sea level rise.

Modelling has been undertaken for the 0.2% AEP and 0.5% AEP. This assessment demonstrates that the proposed development remains clear of the M5 overland flow path and Salt Pan Creek regional flooding for all storm events up to the probably maximum flood.

6.1.7.3 Management and/or Mitigation Measures

A Flood Safety and Evacuation strategy has been prepared in accordance with the *NSW Flood Risk Management Manual Emergency Management Principles* and is provided in **Appendix 22** which will be adopted at the Subject Site. The strategy includes a range of response triggers and appropriate responses in relation to the level of flooding and risk presented.

6.1.8 Contamination

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

A PSI, DSI and RAP have been prepared by Senversa and provided in **Appendices 33** and **36** of this EIS and is summarised in the following subsections. It is noted that 20 Gow Street has generally not been considered in these investigations noting that no work is proposed on this lot.

6.1.8.1 Existing Environment

Review of the historical documents, photography and site conditions suggests the following timeline for the Subject Site:

- Pre-1948 – Area was utilised for market gardens and production of salt obtained from swampland areas (potentially on the eastern portion of the Subject Site) by evaporating the salt water;
- Early 1950s – British Paints develop the Subject Site;
- 1953 – British Paints begin paint production (Dulux Paint Factory);
- 1960 – Resin Plant begins production of alkyd resin (key component of oil-based paints);
- 1970 – Resin Plant manufacturing reactors in operation producing alkyd resins, phenolic resins and unsaturated polyester resins for fibre reinforced plastics;
- 1985 – Production of water-based paints only;
- 1996 – New 16t reactor installed to improve manufacturing of unsaturated polyester resins;
- 1997 – Production of all paints cease;
- 1999 – Dulux resin business sold to Nuplex Resins Pty Ltd;
- 2001 – Demolition, soil remediation and validation of the Resins Plant; and
- 2003/2004 – Gelcoat Facility building and electrical substation demolished and validated.

TABLE 43 below provides an overview of the areas of environmental interest and potential contaminants identified as a result of the above review which are shown in **Figure 25** below.

TABLE 43: AREAS OF ENVIRONMENTAL INTEREST

AEI #	AEI Name	Potential Contaminants
Subject Site		
AEI03	Former Resin Plant	Heavy metals, phenols, petroleum hydrocarbons, chlorinated solvents.
AEI04	Former Gelcoat Facility	Petroleum hydrocarbons (vehicles spills).
AEI05	Former Dulux Paint Factory	Heavy metals, phenols, resins, petroleum hydrocarbons, chlorinated solvents.
AEI06	Dulux Warehouse	Petroleum hydrocarbons, PCBs, asbestos, lead
AEI09	Former Drum Storages	Petroleum hydrocarbons and CHCs
AEI11	Former Dulux Engineering Workshop	CHCs and petroleum hydrocarbons (diesel)
AEI12	Former Solvent Racks	Petroleum hydrocarbons and CHCs
AEI13	Current Dulux Workshop	Oils, greases (petroleum hydrocarbons), chlorinated solvents.
AEI14	Former Resin Plant Water Treatment Plant	Heavy metals, phenols, resins, petroleum hydrocarbons, chlorinated solvents.

	Former Underground Storage Tanks (USTs) - Dulux Warehouse Garage Former USTs - North Dulux Paint Factory	
Off-Site		
AEI01	Selleys Factory	Petroleum hydrocarbons, PCBs, asbestos, chlorinated solvents. LNAPL occurs in the central part near the former USTs.
AEI02	Selleys Warehouse	Petroleum hydrocarbons, chlorinated solvents.
AEI07	Former Selleys Drum Yard Chemical Storage Shed	Petroleum hydrocarbons, PCBs, asbestos, chlorinated solvents.
AEI08	Former Selleys Engineering Workshop	Petroleum hydrocarbons, chlorinated solvents.
AEI09	Former Drum Storages	Petroleum hydrocarbons and CHCs
AEI10	Former Laboratories Former USTs - Selleys Factory Tank Farm USTs - Selleys Active Tank Farm	Petroleum hydrocarbons, phenols, heavy metals, chlorinated solvents.
Off-Property		
AEI15	Galvatech Pty Ltd (Off-Site)	Acids (sulphuric, nitric, hydrofluoric, chromic), heavy metals (chromium, cyanide, solvents (chlorinated, alcohol and petroleum based), other petroleum hydrocarbons.
AEI16	Sebel Furniture Pty Ltd (Off-Site)	Varnish, liquors, metals (in particular arsenic & copper), other VOCs and SVOCs, CHCs, petroleum-based solvents.
AEI17	Fairford Road Industrial Properties (Off-Site)	Metals, petroleum hydrocarbons, CHCs, petroleum-based solvents.

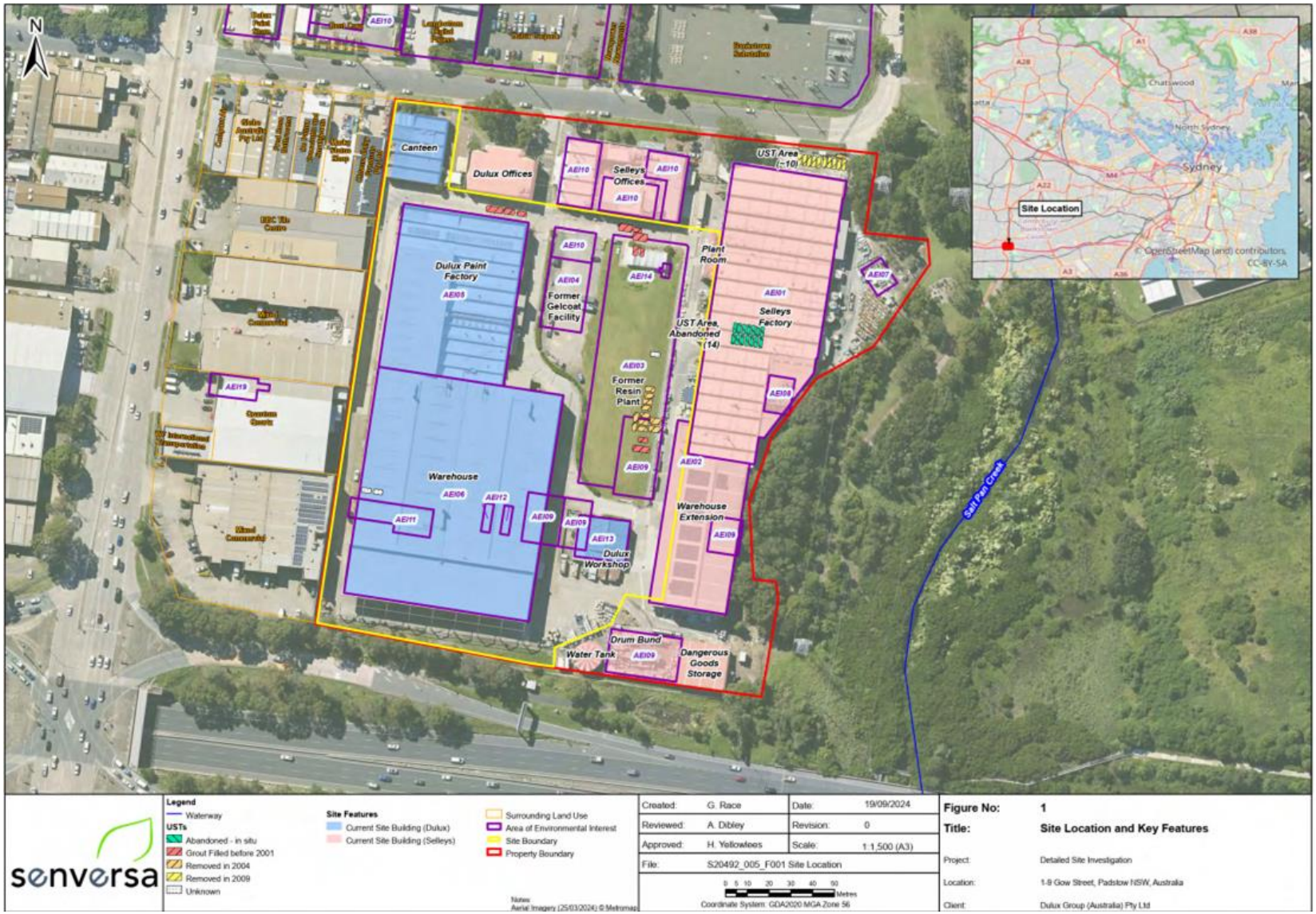


Figure 25. AEI Locations (Source: Senversa, 2024)

6.1.8.2 Assessment of Impacts

The scope of works of the PSI and DSI comprised the following:

- A desktop review that included:
  - Review of historical reports on contamination investigations and remediation with respect to assessing the suitability of the Subject Site and identifying data gaps. This includes review of monitoring and inspection results under the current Environmental Management Plan (EMP);
  - Updating Senversa PSI findings with more recent information to meet current standards and project requirements. This included reviewing historical aerial images, council planning certificates (Section 10.7), historical land Titles, maps of hydrogeology, hydrology, geology, soil, acid sulfate soil and salinity risks, EPA public records and heritage database records;
- Preparation of a supplementary DSI that included:
  - Site inspection to confirm the desktop findings;
  - Review Before You Dig Australia (BYDA) plans and any service plans;
  - Ground penetrating radar (GPR) scan of the historic UST farms across the Subject Site;
  - Sub-slab vapour point installation and sampling in the existing warehouse and paint factory;
  - Soil vapour point installation and sampling near UST farms;
  - Monitoring of existing groundwater wells within the Subject Site to verify conditions and assess other contaminants of potential concern (CoPC) not assessed under the current EMP. This included gauging existing wells across the property, and sampling of six (6) existing monitoring wells;
  - Limited soil sampling within accessible areas of the Subject Site, external to buildings via soil bore (hand auger) or test pits;
  - Laboratory analysis of representative samples of each media for CoPCs. And
  - Data evaluation and reporting.

Based on the above investigations, there is considered to be sufficient data to make decisions on whether management of contamination is required and develop a RAP.

Uncertainties have been identified in the characterisation of contamination at the Subject Site. Residual contamination in soil, soil vapour and groundwater at the property is currently managed under the existing EMP. The proposed development will retain existing building slabs, has minimal cut and will be mostly covered by hardstand or buildings. This development design and measures in the existing EMP can mitigate many of these uncertainties if implemented appropriately. However, key data gaps that warrant addressing include:

- Uncertainty in the extent and temporal changes of impacts to soil vapour. It would also be prudent to re-sample selected vapour points to assess temporal variability;
- Uncertainty in contamination conditions in soil where there has been limited sampling, including the Dulux workshop and canteen areas, or where the development requires bulk excavation;
- Uncertainties in other areas have been (or can be) addressed via soil vapour and/or groundwater sampling, and retention under future buildings/slabs that will limit exposure.
- The nature of groundwater in the central portion of the Subject Site.
- Source and extent of impact to groundwater; and
- Occurrence of remnant USTs in former workshop in the south west of the warehouse.

Based on the results of the investigation, it is considered that a RAP is required for the proposed development to address identified contamination issues and mitigate uncertainties in the understanding of these. These key contamination issues or uncertainties relate to risks associated with:

- Managing exposure to and disturbance of soils due to aesthetic impacts, asbestos in fill and localised hydrocarbon impacts;
- Controlling use of site soils, which may not be ecologically suitable for use as exposed soils or growing media;
- Controlling use of groundwater that may not be suitable for extraction and use, and exposure during deep excavations due to potential impacts in the former UST areas; and
- Mitigating the abovementioned data gaps as part of the construction.

6.1.8.3 Management and/or Mitigation Measures

Based on results of previous investigations outlined above and the Conceptual Site Model (CSM) developed, the remedial objectives are as follows:

- To make the Subject Site suitable for ongoing commercial/industrial land use as part of the development; and
- Mitigate risks to human health and manage potential environmental impacts during the remedial works, including meeting conditions of consent.

On the basis of the understanding of the contamination and proposed development outlined in, the required remediation comprises the following:

- Fill material across the Subject Site: While not all fill material is contaminated, for the purposes of remediation planning all fill material should be considered potentially impacted by asbestos. This is a conservative precautionary approach adopted as the occurrence and concentrations of asbestos in fill have not been delineated laterally or vertically. Fill materials should also be assumed not suitable for use as growing media in landscaping areas unless assessed otherwise;
- Hydrocarbon impacted soils: Soils local to former UST areas impacted by petroleum hydrocarbons, some areas of the former Resins Plant and Gelcoat facility, and fill in the workshop area, that represent a potential elevated risk if exposed;
- Remnant primary chemical storage infrastructure: Available information indicates most former USTs have been decommissioned and removed. However, there is uncertainty in the occurrence of disused USTs in the former workshop area in the south west of the existing warehouse; and
- Groundwater was assessed to represent a low risk provided it is not extracted and used. However, exposure to a hydrocarbon sheen present and potential impacts local to former primary sources warrant control to protect workers during deep intrusive construction or maintenance works.

An assessment of the remediation options is presented in **TABLE 44** below.

TABLE 44: REMEDIATION OPTIONS ASSESSMENT		
Option	**Discussion**	**Conclusion**
1. On-site or off-site treatment	Treatment of hydrocarbon impacted soils on-site is feasible, however, the occurrence of co-contaminants (potentially asbestos, metals and B(a)P) precludes effectiveness and environmental benefit as the soil would still likely require passive management under pavement/buildings. On-site or off-site treatment of contaminated fill material to remove asbestos is not considered appropriate or feasible due to the nature of the asbestos (bonded and friable forms) and large volume of impacted fill. Due to the potential presence of asbestos within the contaminated fill material, it is not suitable for offsite re-use in NSW. Once leaving the Subject site, asbestos contaminated material would become waste and would need to be disposed of at a suitably licensed landfill.	Not feasible
2. Removal of contaminated soils	Excavation and off-site disposal to a suitably licenced landfill facility is technically and logistically feasible but is not considered a viable option given the large volume of fill at the Subject Site and waste generation, which is inconsistent with sustainability goals in NSW. This would also require removal of building slabs currently proposed to be retained and unnecessary exposure and environmental hazards during this process. However, this approach could remove all contamination, negating the need for ongoing management required for other approaches. This option would incur a significant cost that is not proportionate to the reduction in environmental risk that could be achieved through other methods.	Not feasible Targeted removal and disposal of contaminated soils associated with unexpected finds is retained as a contingency.
3. On-site containment with ongoing management	There are several options for on-site containment of the contaminated soils. There is a balance between the degree of conservatism in containment design and ongoing management requirements – i.e. a less conservative design (e.g. minimal capping thickness) will require more onerous ongoing management requirements. All options require ongoing passive management via implementation of a Long Term Environmental Management Plan (LTEMP). The LTEMP would need to be publicly notified and legally enforceable. <u>Below ground, partial enclosure</u> - Remediation would involve excavation of contaminated fill materials and placement within a location identified to require filling for construction purposes. Placement location(s) should be selected within areas that would undergo minor future disturbance such as under warehouse buildings or pavement, with a cover comprising a constructed capping layer and marker placed over impacted fill. A base liner is not considered necessary due to the complexity of construction and no leachable contaminants being identified in previous investigations. Where contaminated soil remains in situ upon reaching construction RLs, it should be covered with a capping layer as per placed materials. This method is viewed as suitable due to proposed construction methodology and low likelihood of contact with contaminated materials following placement and capping within the Subject Site.	Capping of fill material in-situ under existing building slabs and as part of paving and levelling works is the preferred option. Implementation of an LTEMP is required.

	Above ground containment - Remediation would involve construction of an above ground mound with HDPE cap and soil/clay cover, no base liner. This method is viewed as unsuitable due to restrictions on available space and the potential for creating increased surface water runoff to low lying areas within the Subject Site. In-situ capping (physical separation) – Imported material may be used as a capping layer to provide physical separation between contaminated fill and site receptors. The capping layer may include one or more of a combination of environmentally and geotechnically suitable soil material, building slabs and subgrade or pavement and subgrade, with a marker. This option is viewed as being suitable due to the proposed site levelling and construction methodology, site layout mostly comprising buildings/pavement and subsequent low likelihood of contact with contaminated materials. These options are capable of mitigating risks to low levels, while minimising waste generation and impacts to the surrounding environment/community from truck movements etc. The in-situ capping option is preferred as it does not require bulk movement of asbestos-impacted material within the Subject Site, which has a greater risk of impact to workers and surrounding environment during remediation works.	
4. Do nothing and ongoing management	Implementation of an LTEMP is capable of managing residual contamination under the existing site condition and use. However, this is not considered suitable for the Subject Site where there is the opportunity to reduce risks to more acceptable levels while minimising ongoing management requirements.	Not appropriate

The preferred remediation approach is:

1. Removal to the extent practicable of remaining disused USTs (if found to be present), or decommissioning if otherwise, as required under UPSS regulation.
2. In-situ containment of contaminated soils (Option 3). This includes leaving undisturbed materials under existing building slabs and pavement to be retained, and capping other contaminated soil via new building slabs, pavement or clean soils and a marker layer.
3. Use of suitable site soils or imported media in open space landscaping areas.
4. Passive management under an LTEMP to restrict use of groundwater and control exposure to residual contamination at depth during deep intrusive works. The aim is that no actions would be needed for normal site use by workers, visitors and landscaping maintenance workers. The LTEMP will include a Remediation Work Plan, Validation Plan, ongoing site management and Contingency Plan (including unexpected finds protocol).

Subject to the suitable implementation of the measures described in the RAP, it is concluded that the Subject site can be made suitable for the intended use and that the risks to the environment can be appropriately protected during the remediation works. Ongoing passive management of certain intrusive works into residual contaminated soils and impacted groundwater under building slabs, pavement and a marker layer will be required via appropriate implementation of a passive LTEMP.

6.1.9 Soils

A Civil Engineering Report has been prepared by CostinRoe Consulting and geotechnical/soil assessment have been prepared by PSM and are provided in **Appendices 13**, **24** and **37** of this EIS which consider the potential impacts on soil resources and riparian areas on and near the Subject Site.

6.1.9.1 Existing Environment

The Subject Site is predominantly underlain by

- Holocene sediments consisting of silty to peaty quartz sand, silt and clay;
- Ferruginous and humic cementation in places;
- Common shell layers overlying; and
- Ashfield Shale of Wianamatta Group consisting of black to dark-grey shale and laminate.

Groundwater has been observed at a depth of 3.4m below ground. It has been assessed that the majority of the soils on the Subject Site are classified as 'non-saline'. The Subject Site is identified as comprising Acid Sulfate Soils Class 2 & 5 pursuant to CBLEP2023.

6.1.9.2 Assessment of Impacts

Bulk earthworks will be required to facilitate the proposed development The earthworks will be undertaken to provide a large flat building pad, hardstand area, a car parking area and a new truck entry from Gow Street. A high-level earthwork volume estimate assessment has been completed for the Subject Site which is provided in **TABLE 10** above and detailed on the Civil Engineering Plans proposed in **Appendix 12**.

Minor retaining walls will be required to interface with existing levels and structures around the redevelopment. These are anticipated to comprise modular masonry block system (Keystone) with reinforced soil backfill or core-filled masonry block with cantilevered footings. Location and indicative heights of retaining walls are also shown in **Appendix 12**.

To assist in maintaining embankment stability permanent batters in clay will be no steeper than three (3) horizontal to one (1) vertical while temporary batters will be no steeper than two (2) horizontal to one (1) vertical.

Permanent batters will also be adequately vegetated or turfed which will assist in maintaining embankment stability. Stability of batters and reinstatement of vegetation shall be in accordance with Erosion and Sediment Control Plans provided in **Appendix 12**.

6.1.9.3 Management and/or Mitigation Measures

In order to ensure that the proposed earthworks would not result in any adverse impacts relating to soil resources and riparian area, the following documentation has been prepared which would be implemented as part of the future CMP:

- Erosion and Sediment Control Plans included in **Appendix 12**;
- Acid Sulfate Soils Management Plan included in **Appendix 4**; and
- Salinity Management Plan included in **Appendix 38**.

6.1.10 Hazard and Risk

A Preliminary Hazard Analysis (PHA) has been prepared by Salus Risk Consulting and is included at **Appendix 35** of this EIS.

6.1.10.1 Existing Environment

The BOM has a weather station at Bankstown Airport which is approximately 4km from the Subject Site. The wind rose data indicates that the annual average prevailing wind direction in the mornings are from the west whereas in the afternoon they are from the east to south east, other than in winter where they are more from the south west.

6.1.10.2 Assessment of Impacts

The proposed development will seek to store a range of DGs at the Subject Site which relate to the operation of the proposed development. **TABLE 45** provides an overview of the DGs proposed to be stored and includes an assessment against the relevant screening thresholds of the Resilience and Hazards SEPP and Applying SEPP 33.

TABLE 45. DANGEROUS GOODS

Class	Quantity	SEPP Threshold (Quantity/Distance)	Threshold Exceeded (Y/N)
2.1	50kg	100kg	Y
3 PGII & PGIII	358,900L	10.8m-11.7m	N
4.1	50kg	5,000kg or L	Y
5.1	50kg or L	5,000kg or L	Y
5.2	600kg or L	10,000kg or L	Y
6.1	0	2,500kg or L	Y
8 PGII	38,500kg or L	25,000kg or L	N
8 PGIII	11,000kg or L	50,000kg or L	Y
9	4,500kg or L	N/A	Y

The maximum storage quantities for class 8 PG II substances exceed the quantity threshold and the minimum distances for combined class 3 PG II and PG III flammable liquids to areas where there could be off-site consequences are exceeded. These classes require further analysis in accordance with Applying SEPP 33. The maximum storage quantities for all other classes of dangerous goods do not exceed the thresholds and do not require further analysis,

Class 8 Corrosive Substances

The proposed development will store 38,500kg or L of class 8 PG II corrosive substances to kept in Depots 15, 17 and 18 with none of the storages independently exceeding the storage thresholds. Details and locations of the corrosive substances are shown in **TABLE 46**, **Figure 26** and **Figure 27** below.

TABLE 46: CLASS 8 STORAGE LOCATIONS AND QUANTITIES

Depot	Class	Maximum Quantity
15	8 PG II Hypochlorite	24,000kg or L
17	8 PG II Acid	5,500kg or L
17	8 PG II Alkali	0
17	8 PG II N.O.S	4,000kg or L
18	8 PG II Acid	1,000kg or L
18	8 PG II Alkali	3,500kg or L
18	8 PG II N.O.S	500kg or L
Total	8 PG II	38,500kg or L

Figure 26. Depot Locations (Source: Salus, 2024)

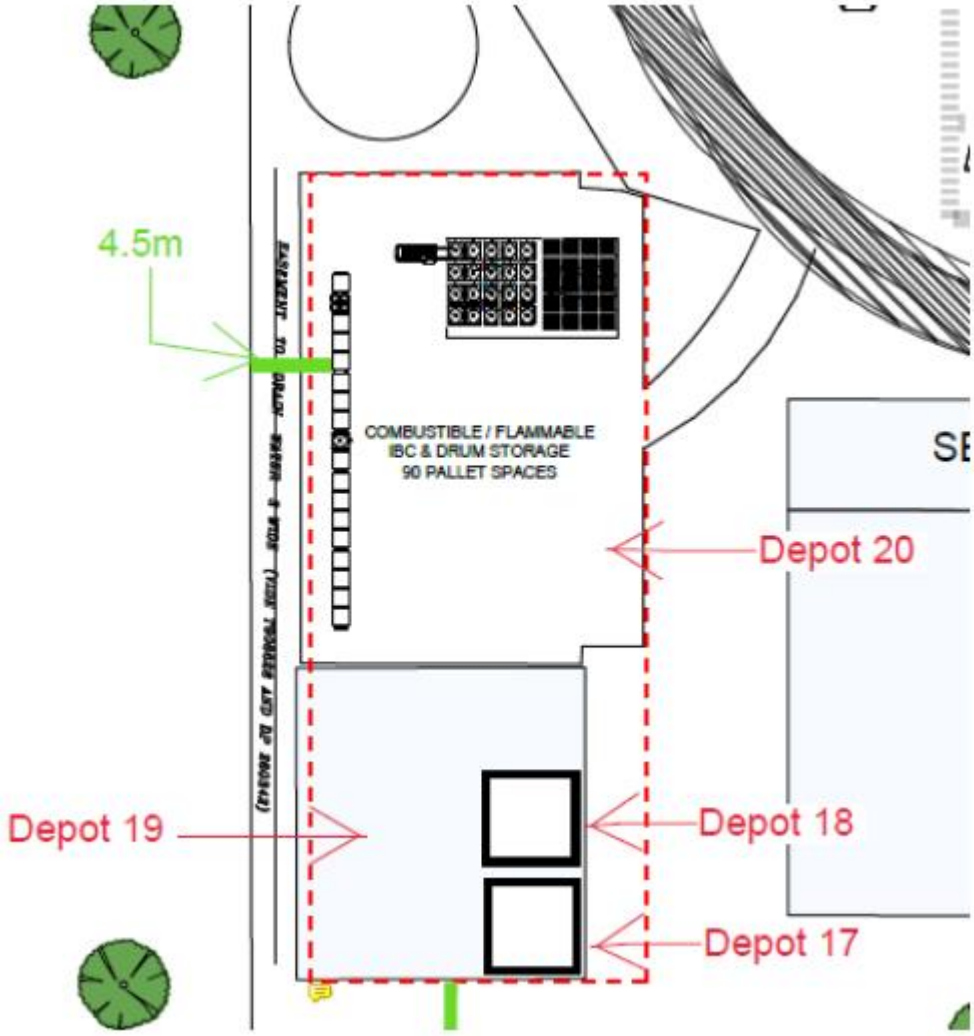


Figure 27. Class 8 Depot Locations (Source: Salus, 2024)

The stores for the corrosive substances can be grouped into two (2) storages area with Depot 15 storing hypochlorite solution in bulk and combined Depots 17 & 18 storing a variety of corrosive substances in packages ranging from 20L to 1,000L. These storage areas are remote from one another and neither storage area would exceed the quantity screening threshold on their own. Based upon this assessment a Level 1 Preliminary Hazard Analysis is considered appropriate for the storage areas.

A hazard identification and word analysis are provided in Appendix 10.2 of **Appendix 35** for the major risk scenarios which demonstrates that the overall risk for the storages of corrosive substances is Low with the proposed risk controls implemented.

Class 3 Flammable Liquids

The minimum distances to the property boundaries are met for all Class 3 flammable liquids storages other than in the following locations;

- Depot 1 – Class 3 underground bulk tanks tanker fill points – 1m (see **Figure 28** below)
- Depot 19 – Class 3 Drum and pail storage – 4.5 m (see **Figure 27** above); and
- Depot 20 – Class 3 IBC & Drum Storage – 4.5 m (see **Figure 17** above).

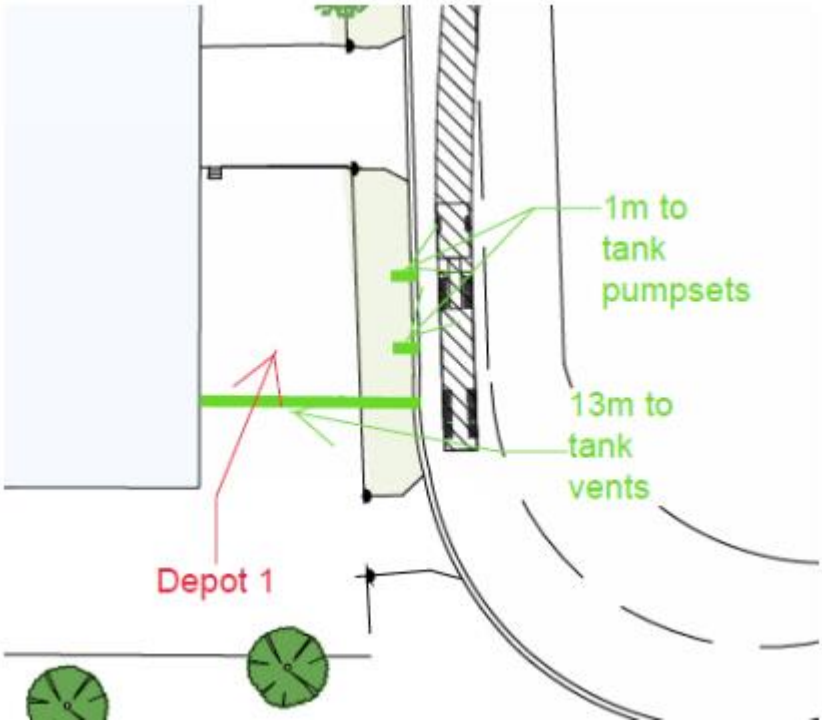


Figure 28. Class 3 Depot Location (Source: Salus, 2024)

Depots 19 and 20 are adjacent to one another and pose a similar hazard. The total quantity of Class 3 flammable liquids will be combined as their cumulative effect is likely to be significant. The set back distances to all other storages of Class 3 flammable liquids are met.

The aggregate quantity of Class 3 flammable liquids of packing groups II and III for the Subject Site is 478,360L. Of this 98,500L is stored underground in bulk tanks. The underground storage can be divided by a factor of five (5) reducing the total quantity subject to a PHA to 399,560L. As such, the proposed DG storage exceeds the screen thresholds. It is noted that the transport screening thresholds are not exceeded.

The Subject Site includes a 100,000L site containment tank as part of its First Flush Stormwater System. During a rainfall event, stormwater entering pits/drains on the roadways enters the stormwater system and flows to Pit 16. Under normal circumstances stormwater will flow through the 25,000L Triple Interceptor Pit (TIP) and collect in the 100,000L SCT. Stormwater leaves the Subject Site and enters Salt Pan Creek via Pit 18 after either coming from Pit 16 or from the 100,000L SCT.

Upon activation of any of the Emergency Spills Alarm Buttons all three (3) control valves in Pit 16 will close containing any further stormwater/ spill on-site. The consequences are likely to be minor as a large proportion of contaminated fire water will be captured on-site.

A multi-level risk assessment has been undertaken for the Class 3 storage including consideration of the following:

- External consequences – The underground tanks at Depot 1 have an effect are of 0.4ha and the above ground flammable liquids as Depots 19 and 20 have an effect area of 6ha. 25% of the effect area is on the Subject Site with the balance encroaching on the Salt Pan Creek Reserve to the east and the South-Western Motorway and a couple of smaller factories to the south;
- Possible number of fatalities – Depot 1 results in a possibility for 1.6 fatalities and Depots 19 & 20 result in a possibility for 30 fatalities; and
- Frequency of occurrence – Depot 1 has a frequency of one (1) per 100,000,000 events per year and Depots 19 & 20 have a frequency of one (1) per 10,000,000 events per year.

Based on the above, the overall proposed risk to society is negligible with a low-risk rating for any off-site consequences, with the implementation of risk controls.

6.1.10.3 Management and/or Mitigation Measures

Recommendations for the mitigation and management of the dangerous goods are documented within **Appendix E** of this EIS which include the following:

- All equipment must be installed to manufacturer's specifications and must comply with all relevant standards listed within; and
- Specific safety features of the Subject Site are to be maintained and reviewed on a regular basis to ensure that they maintain, if not exceed industry standards.

6.1.11 Fire and Emergency Services

A Fire Safety Report has been prepared by Scientific Fire Services and is included at **Appendix 21** of this EIS. The proposed development has been designed and constructed in accordance with the provisions commensurate with Type C fire resisting construction and the Large Isolated Building (LIB) provisions prescribed in Volume One of the Building Code of Australia (BCA).

As shown in **Figure 29** below, the proposed perimeter vehicular access will comply with the relevant performance requirements of the BCA and *Fire and Rescue NSW fire safety guideline - Access for fire brigade vehicles and firefighters*.

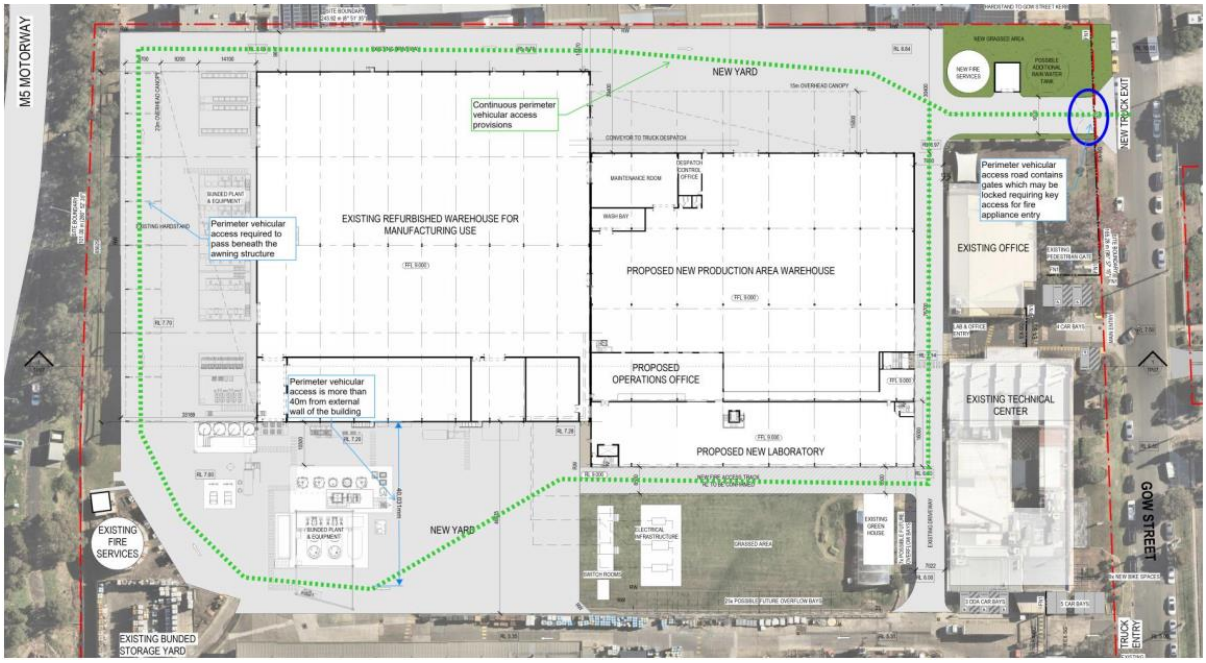


Figure 29. Perimeter Vehicular Access Provisions (Source: Scientific Fire Services, 2024)

6.1.12 Visual

A Visual Impact Assessment Report (VIA) has been prepared by Geoscapes Landscape Architects and is included at **Appendix 43** of this EIS. In addition, Landscape Plans prepared by Geoscapes Landscape Architects are provided at **Appendix 29**.

6.1.12.1 Existing Environment

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

There are no important views corridors of the wider landscape that include the proposed development.

6.1.12.2 Assessment of Impacts

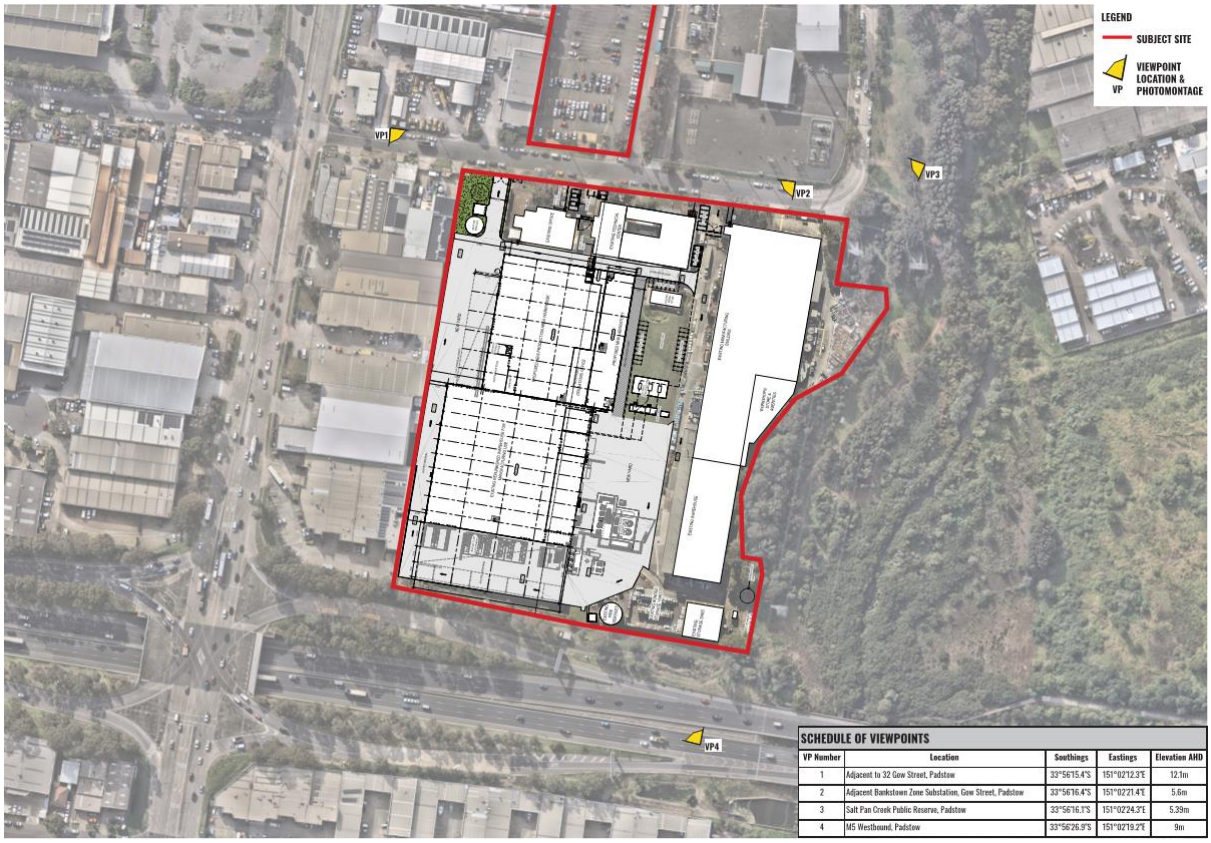
A qualitative assessment of the visual impacts and changes to landscape has been undertaken in the Urban Design Visual Impact Assessment Report based on the following guidelines:

- Guidelines for Landscape and Visual Impact Assessment (GLVIA) – Third Edition (LI/IEMA 2013);
- The Landscape Institute Advice Note 01 (2011) Photography and Photomontage in Landscape and Visual assessment;
- The Guidance note EIA-N04 Guidelines for Landscape Character and Visual Impact Assessment, NSW State Government, Roads and Maritime Services (2013); and
- Guidance Note for Landscape and Visual Assessment 2018 (AILA).

Receptor Selections

The following list of visual receptors has been selected for photomontage and visual impact assessment, the location of which are shown in **Figure 30** below:

- Adjacent to 32 Gow Street, Padstow (VP1);
- Adjacent Bankstown Zone Substation, Gow Street, Padstow (VP2);
- Salt Pan Creek Public Reserve, Padstow (VP3); and
- M5 Westbound, Padstow (VP4).



SCHEDULE OF VIEWPOINTS

VP Number	Location	Southings	Eastings	Elevation AHD
1	Adjacent to 32 Gow Street, Padstow	33°56'15.4"S	151°02'12.3"E	12.1m
2	Adjacent Bankstown Zone Substation, Gow Street, Padstow	33°56'16.4"S	151°02'21.4"E	5.6m
3	Salt Pan Creek Public Reserve, Padstow	33°56'16.1"S	151°02'24.3"E	5.39m
4	M5 Westbound, Padstow	33°56'26.9"S	151°02'19.2"E	9m

Figure 30. Viewpoint Locations (Source: Geoscapes, 2024)

A viewpoint to the south at a distance of approximately 200m from the Subject Site in the westbound lane of the M5 Motorway has been selected as there would be a view corridor of the Subject Site from the M5 that motorists would experience for a short period of time.

Three (3) viewpoints in close proximity to the proposal have been located along Gow Street and Salt Pan Creek. These have been included primarily to assess bulk and scale along the road frontage. However, visual receptors along Gow Street and Salt Pan Creek would be expected to have low sensitivity. This is because the existing visual baseline is dominated by the character of the industrial area. At locations along Gow Street visual receptors would most typically be workers or motorists traveling through the area who would not be expected to place a high importance on their surrounding view.

To the east has been selected it is clear from drone photography flown at the proposed ridge heights that vegetation to Salt Pan Creek provides a visual buffer to residential areas beyond. View corridors from specific streets or properties may exist, however any visual impacts received at these locations would be negligible.

Visual Impact Assessment

Four (4) viewpoints were captured and assessed by Geoscapes, as depicted in **Figures 31** to **42**. A summary of the viewpoints analysis is provided within **TABLE 47** below.

Figure 31. Viewpoint 1 – Baseline Photo (Source: Geoscapes, 2024)

Figure 32. Viewpoint 1 –Year 0 (Source: Geoscapes, 2024)

Figure 33. Viewpoint 1 –Year 15 (Source: Geoscapes, 2024)

This view is located to the west of the Subject Site close to the intersection with Fairford Road. The baseline photograph was taken from a grass verge on the north side of Gow Street.

Figure 34. Viewpoint 2 – Baseline Photo (Source: Geoscapes, 2024)

Figure 35. Viewpoint 2 –Year 0 (Source: Geoscapes, 2024)

Figure 36. Viewpoint 2 –Year 15 (Source: Geoscapes, 2024)

This viewpoint was taken on the grass verge close to the bend of Gow Street in front of the Bankstown Zone Substation.

Figure 37. Viewpoint 3 – Baseline Photo (Source: Geoscapes, 2024)

Figure 38. Viewpoint 3 –Year 0 (Source: Geoscapes, 2024)

Figure 39. Viewpoint 3 –Year 15 (Source: Geoscapes, 2024)

Salt Pan Creek Public Reserve is situated to the east of the Subject Site. It has a pedestrian shareway that runs under the M5 motorway and connects further north and south to a network of green spaces and walks along the creek. It has a park shelter with seating and is sometimes used by workers of surrounding units.

Figure 40. Viewpoint 4 – Baseline Photo (Source: Geoscapes, 2024)

Figure 41. Viewpoint 4 –Year 0 (Source: Geoscapes, 2024)

Figure 42. Viewpoint 4 –Year 15 (Source: Geoscapes, 2024)

This view was taken from Google Earth Pro and is representational of the view that motorists would experience when traveling westbound along the M5 and past the Subject Site.

TABLE 47: VISUAL IMPACT ASSESSMENT			
Viewpoint	**Receptor Sensitivity**	**Magnitude of Change**	**Significance of Visual Impact**
VP1 **Adjacent to 32 Gow Street, Padstow - Looking Southeast**	The surrounding context is industrial and motorists traveling east would experience a similar view as that shown in the baseline photograph. Numbers of pedestrians are likely to be very low and more limited to workers of adjacent commercial and industrial units. Therefore, receptor sensitivity has been judged to be **very low**.	The proposed development will form a new and recognisable element within the view which is likely to be recognised by the receptor. Views are oblique and at close range with a moderate horizontal and vertical extent of the view affected. The magnitude of change is judged to be **medium**.	The significance of the visual impact at this location is judged to be minor **negligible**.
VP2 **Adjacent Bankstown Zone Substation, Gow Street, Padstow - Looking Southwest**	Similarly to Viewpoint 1 this view would be experienced predominately by motorists traveling through an area which is dominated by industrial development. Numbers of pedestrians are likely to be very low and more limited to workers of adjacent commercial and industrial units. There would be little importance placed on views by this type of receptor therefore, the sensitivity has been judged to be **very low**.	The proposed development will form a small component of the view, and the view, whilst slightly altered, would be similar to the baseline situation. The proposed warehouse is set behind existing buildings and vegetation. Therefore, it is judged that the residual magnitude of change is **very low**.	The significance of the visual impact at this location is judged to be **negligible**.
VP3 **Salt Pan Creek Public Reserve, Padstow - Looking Southwest**	Receptors of this view would likely range from cyclists, joggers, walkers and workers of nearby industrial units. The view is already heavily affected by industrial use when looking to the west, such as the substation seen in the viewshed. Therefore, the sensitivity has been judged to be **low**.	Existing buildings and vegetation result in the proposed production warehouse being screened at lower levels. The top of the new building would be seen and be recognisable as a new element by the receptor. This would be further screened at Year 15 following the maturity of proposed planting being partially visible and therefore becoming a small component. Views are oblique with a small horizontal and vertical extent of the view affected. Therefore, it is judged that the residual magnitude of change is **low**.	The significance of the visual impact at this location is judged to be **minor negligible**.
VP4 **M5 Westbound, Padstow - Looking Northwest**	Motorists traveling westbound would experience a view as shown in the baseline image however, this is only likely	The refurbished warehouse will visually be an improvement over the existing. The proposed new production warehouse is	The significance of the visual impact at this location is judged to be **minor**.

TABLE 47: VISUAL IMPACT ASSESSMENT			
Viewpoint	**Receptor Sensitivity**	**Magnitude of Change**	**Significance of Visual Impact**
	to be for a short amount of time as cars would usually be traveling at 100km per hour. Gaps are visible through the tree canopy with buildings from the Subject Site seen beyond. The visual baseline contains a busy motorway adjacent to an industrial area. The sensitivity has been judged to be **low**.	seen behind new bunded plant and equipment, this presents a new element that would be apparent to the receptor. Therefore, it is judged that the residual magnitude of change is **medium**.	

It is concluded that the proposed development is well screened from the public domain through a combination of existing buildings and vegetation. Residential areas within Punchbowl would not experience views of the development at locations close to Salt Pan Creek due to the presence of existing vegetation.

Any visual impacts received by receptors at close proximity from Gow Street are considered to be minor negligible or negligible. Although the proposed development will present as a new element and be seen above existing buildings the change in view is small when considering the industrial context. Sensitivity is considered to be low which is also due to the surrounding industrial character and the type of visual receptors who would subject to views of the proposed development.

Views from open space adjacent to Salt Pan Creek must also be considered against the current industrial baseline to the west which includes Bankstown Zone Substation. Here the development would be more noticeable following completion however, proposed landscaping is expected to further reduce visual impacts at Year 15. For motorists the duration of the views received on Gow Street and the M5 are also very short, especially along the M5 where the speed limit is 100 km/h.

6.1.12.3 Management and/or Mitigation Measures

A small number of trees are required to be removed as a result of the proposed development. Further trees to be removed have also been identified on the basis of poor health. To mitigate this removal new trees are proposed to be planted within the development, this will result in a net increase to canopy cover. Trees planted along the northern boundary will also contribute to visual screening of the development for receivers.

6.1.13 Waste Management

The following documentation has been prepared to consider the waste streams, quantities and management measures for the proposed development:

- Demolition and Construction Waste Management Plan prepared by LG Consult and provided in **Appendix 14**;
- Operational Waste Management Plan prepared by LG Consult and provided in **Appendix 31**; and
- Destructive Hazardous Materials Survey Report prepared by LG Consult and provided in **Appendix 16**.

6.1.13.1 Management and/or Mitigation Measures

Demolition and Construction Waste

The estimated demolition waste quantities are summarised in **TABLE 48** below.

TABLE 48: ESTIMATED DEMOLITION WASTE

Type of Waste	Reuse	Recycling	Disposal	Method
	Volume	Volume	Volume	
Excavation Material (Soil Spoil)	<600m^3	0m^3	0m^3	N/A (if the disposal applies as detailed below)
Timber	0m^3	<5m^3	0m^3	Recycling Management Centre
Concrete	0m^3	<400m^3	0m^3	Recycling Management Centre
Asphalt	0m^3	0m^3	0m^3	N/A

Brick/Pavers	0m³	<50m³	0m³	Recycling Management Centre
Tiles	0m³	<2m³	0m³	Recycling Management Centre
Metal	0m³	<10m³	0m³	Recycling Management Centre
Glass	0m³	<2m³	0m³	N/A
Furniture	0m³	0m³	0m³	N/A
Fixtures and Fittings	0m³	0m³	0m³	N/A
Floor Coverings	0m³	0m³	0m³	N/A
Packaging (Use Pallets, Pallet Wraps)	0m³	0m³	0m³	N/A
Garden Organics	0m³	0m³	0m³	N/A
Containers (Cans, Plastics, Glass)	0m³	0m³	0m³	N/A
Paper/Cardboard	0m³	0m³	0m³	N/A
Residual Waste	0m³	0m³	<20m³	Recycling Management Centre
Hazardous/Special Waste	0m³	0m³	<100m³	Recycling Management Centre
Other	0m³	0m³	0m³	N/A
Total	**<600m³**	**<469m³**	**<120m²**	

The estimated construction waste quantities are summarised in **TABLE 49** below.

TABLE 49: ESTIMATED CONSTRUCTION WASTE

Type of Waste	Reuse	Recycling	Disposal	Method
	Volume	Volume	Volume	
Excavation Material (Soil Spoil)	0m³	0m³	0m³	N/A (if the disposal applies as detailed below)
Green Waste	0m³	0m³	0m³	N/A
Brick/Pavers	0m³	<5m³ (offcuts)	0m³	Recycling Management Centre
Tiles	0m³	<5m³ (offcuts)	0m³	Recycling Management Centre
Concrete	0m³	<1m³	0m³	Recycling Management Centre
Plasterboard	0m³	0m³	<2m³	Recycling Management Centre
Asbestos	0m³	0m³	0m³	N/A
Metal – Specify	0m³	<1m³ (steel studs)	0m³	Recycling Management Centre
Timber - Specify	0m³	0m³	0m³	N/A
Other Waste – Specify (eg. Paints, PVC Tubing)	0m³	0m³	<2m³ (offcuts)	Waste Management Centre
Packaging (Use Pallets, Pallet Wraps)	0m³	<0.5m³	0m³	Recycling Management Centre
Containers (Cans, Plastics, Glass)	0m³	<0.5m³	0m³	Recycling Management Centre

Paper/Cardboard	$0m^3$	$<1m^3$	$0m^3$	Recycling Management Centre
Total	**$<0m^3$**	**$<4m^3$**	**$<4m^2$**	

Waste-type-specific reduction measures will be employed during demolition and construction stages, with the following specific procedures:

- Applying practical building designs and construction techniques;
- Appropriate sorting and segregation of demolition and construction wastes to ensure efficient recycling of wastes;
- Selecting construction materials taking into consideration to their long lifespan and potential for reuse;
- Ordering materials to size and ordering pre-cut and prefabricated materials;
- Reuse of formwork (where possible);
- Planned work staging;
- Reducing packaging waste on-site by returning packaging to suppliers where possible, purchasing in bulk, requesting cardboard or metal drums rather than plastics, requesting metal straps rather than shrink wrap and using returnable packaging such as pallets and reels;
- Careful on-site storage and source separation;
- Subcontractors informed of site waste management procedures; and
- Coordination and sequencing of various trades.

The anticipated beneficial reuses of demolition and construction waste are summarised as follows:

- All solid waste timber, concrete, tiles and rock that cannot be reused or recycled will be taken to an appropriate facility for treatment to recover further resources or for disposal to landfill in an approved manner;
- All asbestos, hazardous and/or intractable wastes are to be disposed of in accordance with SafeWork Authority and EPA requirements;
- Portable, self-contained toilet and washroom facilities will be provided at the Subject Site and will be regularly emptied and serviced by a suitably qualified contractor;
- Provision for the collection of batteries, fluorescent tubes and other recyclable resources will be provided onsite to enable offsite recycling;
- Drink container recycling should be provided onsite or these items sorted offsite for recycling at an appropriately licensed facility;
- All garbage will be disposed of via a council approved system; and
- Opportunities for materials exportation and reuse with other local construction operations will be investigated.

Waste storage locations will be accessible and allow sufficient space for storage and servicing requirements. These locations will also be flexible in order to cater for change of use throughout the demolition and construction stages. Where space is restricted (during construction), dedicated stockpile areas are to be delineated on the Subject Site, with regular transfers to dedicated skip bins for sorting. The positions of the designated waste holding areas on-site will change according to building works and the progression of the development, but must consider visual amenity, OH&S and accessibility in their selection.

All waste placed in stockpile areas/skips for disposal or recycling shall be adequately contained to ensure that the waste does not fall, blow, wash or otherwise escape from the Subject Site. Appropriate siting of waste stockpile locations will take into account slope and drainage factors to avoid contamination of stormwater drains during rain events.

Waste/recycling storage locations will be assigned during the demolition and construction works and will provide adequate space to accommodate all waste and recycling bins associated with the

demolition (up to approximately 24 x 2,000 L bins) and construction (up to approximately 12 x 2,000L bins).

Recycling bins must be accessible to all demolition and construction employees and must be clearly sign posted and colour coded to ensure segregation of waste and recycling is effective. Waste containers are to be kept clean and in a good state of repair.

Waste collection areas will allow for manoeuvring of a rear loading vehicle truck of typical sizes between 8.8m to 9.25m long x 2.6m wide truck, and 3.6m head clearance.

Indicative locations for demolition and construction waste areas are shown in **Figures 43** and **44** below.

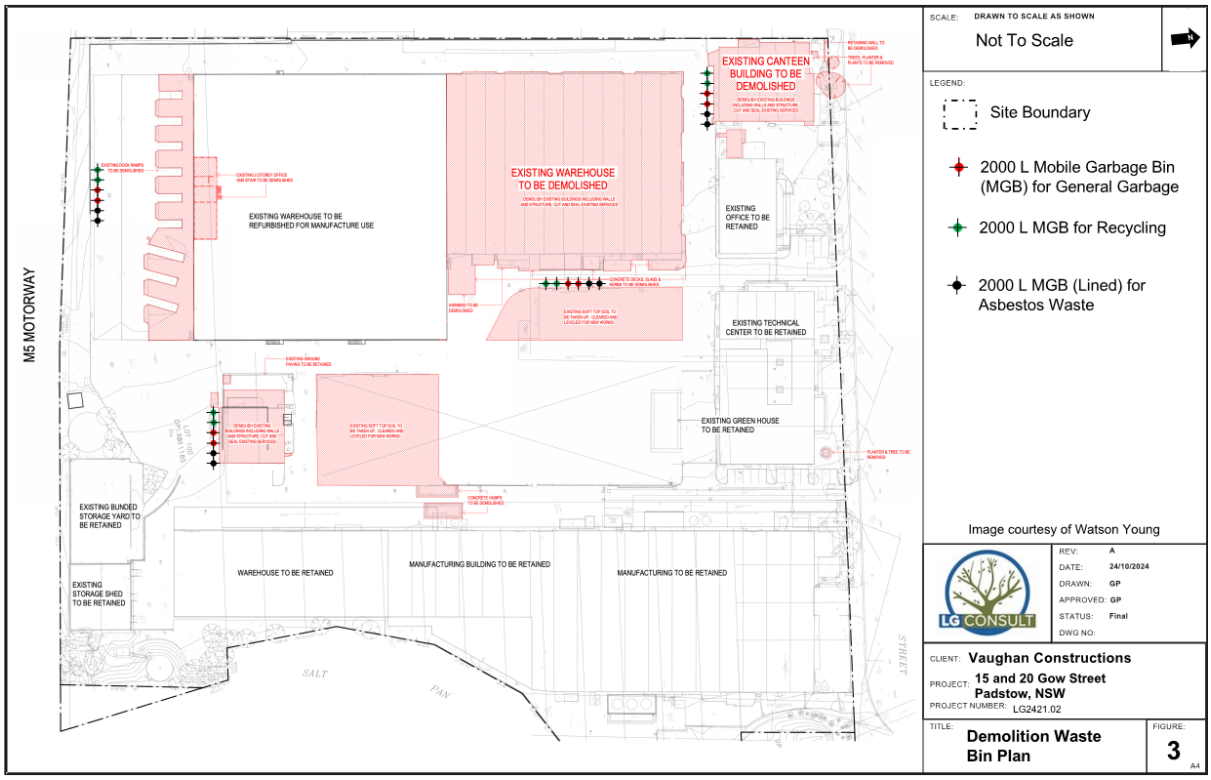


Figure 43. Demolition Waste Bin Plan (Source: LG Consult, 2024)

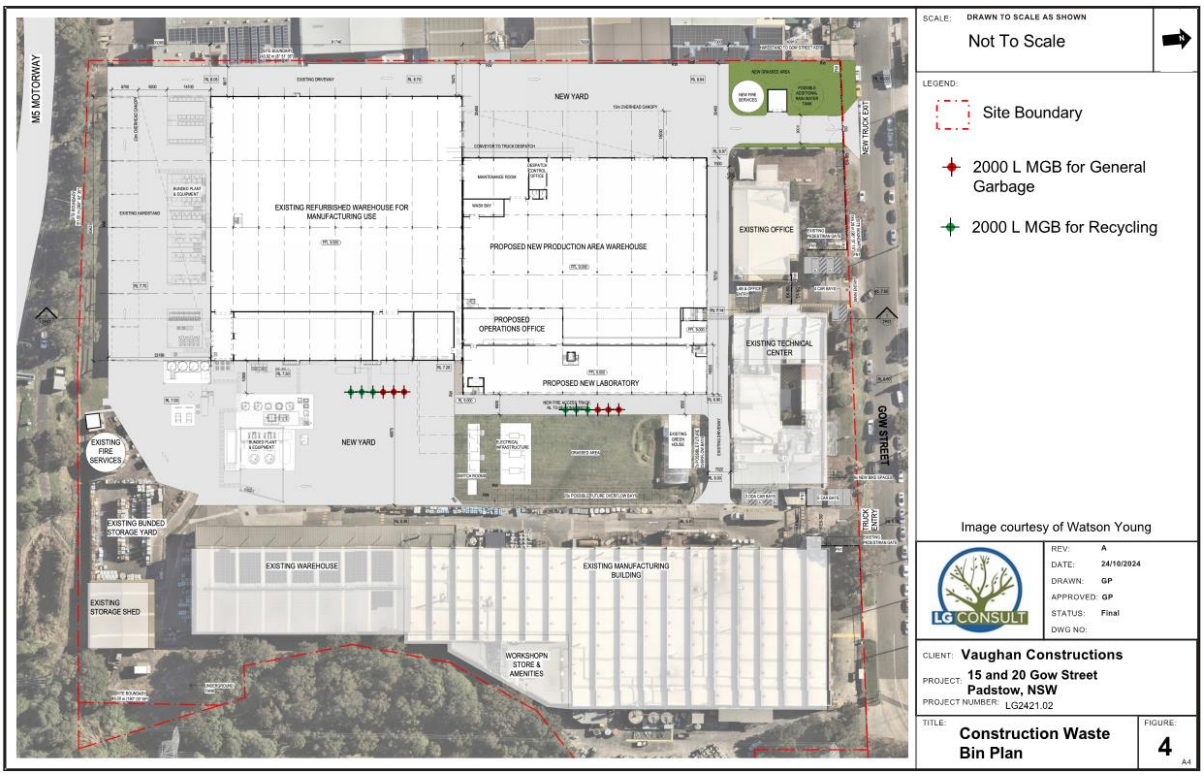


Figure 44. Construction Waste Bin Plan (Source: LG Consult, 2024)

All liquid and non-liquid wastes generated during development construction works (if any) shall be classified in accordance with the requirements of NSW EPA *Waste Classification Guidelines, Part 1: Classifying Waste*. Samples shall be collected by appropriately trained and experienced personnel from stockpiled or in-situ waste materials by the use of a hand trowel. The hand trowel shall be thoroughly decontaminated using phosphate free detergent and distilled water between each sampling location.

During the collection of soil samples, features such as seepage, discolouration, staining, odours and other indications of contamination should be noted on the field documentation. Collected soil samples shall be immediately transferred to sample containers of appropriate composition (glass jars). Sample labels shall record job number; sample identification number; and date and time of sampling.

Sample containers shall be transferred to a chilled ice box for sample preservation prior to and during shipment to the testing laboratory. A chain-of-custody form should be completed and forwarded with the samples to the testing laboratory. Soil samples shall be analysed by both a primary and secondary (independent check) laboratory, both of which shall be NATA accredited for the required analyses. In addition, the laboratories will also be required to meet the environmental consultant's
own internal quality assurance requirements. The analytical data shall be compared against the waste criteria contained in NSW EPA *Waste Classification Guidelines, Part 1: Classifying Waste* for heavy metals, TRHs, BTEX, PAHs, total pesticides (OCPs and OPPs), PCBs and TCLP in benzo(a)pyrene, lead and nickel.

All wastes removed from the Subject Site shall be transported in accordance with relevant road and transportation regulatory requirements and in accordance with the existing CTMP. Where required (depending on the classification of the wastes), appropriately licensed transport contractors shall be used.

The appointed transporters shall be responsible for ensuring they are appropriately licensed to:

- Carry the particular type of waste; and
- Transport the materials to an appropriately licensed facility.

Where the waste is classified as Restricted Waste or Hazardous Waste, the transporter is required to carry (subject to a number of exceptions) appropriately completed waste data forms with each load and provide a copy to the waste facility to which the waste is taken.

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

Operational Waste

The estimated weekly operational waste quantities for the years 2024 to 2030 and 2031 onwards are provided **TABLE 50** and **TABLE 51** below.

TABLE 50: ESTIMATED WEEKLY OPERATIONAL WASTE FROM 2024 TO 2030

Type of Waste	Reuse	Recycling	Disposal	Method
	Volume	Volume	Volume	
Mixed organics	0m³	0.1t = 0.3m³ per week	0m³	Recycling Management Centre
Coming recycling	0m³	0.2t = 3.5m³ per week	0m³	Recycling Management Centre
General waste 1 (1)	0m³	0m³	4.3t = 28m³ per week	Waste Management Centre
General waste 2 (2)	0m³	0m³	0.04t = 0.4m³ per week	Waste Management Centre
General waste 3 (3)	0m³	0m³	3.6t = 5.1m³ per week	Waste Management Centre
General waste 4 (4)	0m³	0m³	0.1t = 0.4m³ per week	Waste Management Centre
Chemical waste 1 (5)	0m³	0m³	0.04t = 3.6m³ per week	Waste Management Centre
Chemical waste 2 (6)	0m³	0m³	0.12t = 0.1m³ per week	Waste Management Centre
Chemical waste 3 (7)	0m³	0m³	11t = 8.4m³ per week	Waste Management Centre
Carboard	0m³	3.6t = 38m³ per week	0m³	Recycling Management Centre
E-Waste	0m³	0.01t = 0.1m³ per week	0m³	Recycling Management Centre
Empty metal drums (200L)	0m³	4.3t = 4.8m³ per week	0m³	Recycling Management Centre
Empty IBCS (1,000L)	0m³	0.85t = 85m³ per week	0m³	Recycling Management Centre
Pallets	0m³	0.2t = 1.2m³ per week	0m³	Recycling Management Centre
Trade wastewater	0m³	0m³	200,000L = 200m³ per week	Sewer Discharge

Total	**0m³**	**<9.26t = <133m³**	**<19.2t = <46m³ <200,000L = <200m³**	

Notes:

(1) General solid waste (non-hazardous) from across the Subject Site;
(2) Raw material packaging (plastic/cardboard) with residue;
(3) Dried sludge from wastewater treatment plant;
(4) Mixed dust/powders from central dust collector system;
(5) Empty 25L HDPE containers with minimal liquid residue;
(6) Wash water and defective liquid raw material (eg. F110 waste, oily sludge); and
(7) Reject product, batches unable to be reworked, etc.

TABLE 51: ESTIMATED WEEKLY OPERATIONAL WASTE FROM 2031 ONWARDS

Type of Waste	Reuse	Recycling	Disposal	Method
	Volume	Volume	Volume	
Mixed organics	0m³	0.1t = 0.3m³ per week	0m³	Recycling Management Centre
Coming recycling	0m³	0.2t = 3.5m³ per week	0m³	Recycling Management Centre
General waste 1 (1)	0m³	0m³	1.9t = 13m³ per week	Waste Management Centre
General waste 2 (2)	0m³	0m³	0.02t = 0.2m³ per week	Waste Management Centre
General waste 3 (3)	0m³	0m³	1.6t = 2.3m³ per week	Waste Management Centre
General waste 4 (4)	0m³	0m³	0.05t = 0.2m³ per week	Waste Management Centre
Chemical waste 1 (5)	0m³	0m³	0.02t = 1.6m³ per week	Waste Management Centre
Chemical waste 2 (6)	0m³	0m³	0.05t = 0.04m³ per week	Waste Management Centre
Chemical waste 3 (7)	0m³	0m³	4.8t = 3.7m³ per week	Waste Management Centre
Carboard	0m³	5.6t = 60m³ per week	0m³	Recycling Management Centre
E-Waste	0m³	0.01t = 0.1m³ per week	0m³	Recycling Management Centre
Empty metal drums (200L)	0m³	4.3t = 4.7m³ per week	0m³	Recycling Management Centre
Empty IBCS (1,000L)	0m³	0.85t = 85m³ per week	0m³	Recycling Management Centre
Pallets	0m³	0.2t = 1.2m³ per week	0m³	Recycling Management Centre
Trade wastewater	0m³	0m³	243,570L = 244m³ per week	Sewer Discharge
Total	**0m³**	**<11.3t = <155m³**	**<8.4t = <21m³ <243,570L = <244m³**	

Waste-type-specific reduction measures will be employed during development operation, with the following specific procedures:

- Provision of take back services to clients to reduce waste further along the supply chain;
- Re-work/re-packaging of products prior to local distribution to reduce waste arising;
- Review of packaging design to reduce waste but maintain 'fit for purpose';
- Investigating leased office equipment and machinery rather than purchase and disposal;
- Establish systems with in-house and with supply chain stakeholders to transport products in re-useable packaging where possible;
- Development of 'buy recycled' purchasing policy;
- Flatten or bale cardboard to reduce number of bin lifts required; and
- Providing recycling collections within each of the offices and tearooms (e.g. plastics, cans and glass).

The anticipated beneficial reuses of operational waste are summarised as follows:

- Cardboard, paper, plastic, glass, cans and pallets and containers will be reused/recycled offsite;
- Provision for the collection of batteries, fluorescent tubes and other recyclable resources will be provided on-site to enable offsite recycling;
- All waste materials that cannot be reused or recycled will be taken to an appropriate facility for treatment to recover further resources or for disposal to landfill in an approved manner;
- Waste oil (if any) used in equipment maintenance will be recycled or disposed of in an appropriate manner; and
- Opportunities for materials exportation and reuse with other local industrial operations will be investigated. This will have two (2) benefits: minimising energy through reduction of material reprocessing, encouraging material reuse.

A designated waste storage area is proposed within the eastern portion of the Subject Site (refer to **Figure 45** below) where the recycling bins, garbage skips, plastic and cardboard compactors will be stored prior to collection. Sufficient clearance will be necessary to enable collection vehicles to access the locations of bin storage. Where possible collection times should not coincide with peak operational delivery schedules however the designated area identified will not interfere with operational truck movements. The construction of locations for garbage storage are to comply with BCA requirements and Australian Standards, including screening and fencing.

The waste/recycling storage areas will be constructed of an adequate size to accommodate all waste and recycling bins and bales associated with the development. Recycling bins must be accessible to all employees and must be clearly sign posted and colour coded to ensure segregation of waste and recycling is effective. Sufficient space will be provided for the segregation and storage of varying waste types including provision for the collection of fluorescent tubes, smoke detectors, e-wastes and other recyclable resources.

Sufficient space will also be provided for reuse items such as crates and pallets for occupational safety purposes. Doors/gates to the waste storage locations will be able to be opened from the outside and wide enough to allow for easy passage of waste/recycling containers. Waste collection areas will allow for manoeuvring of a rear loading vehicle truck of typical sizes between 8.8m to 9.25m long x 2.6m wide truck, and 3.6m head clearance.

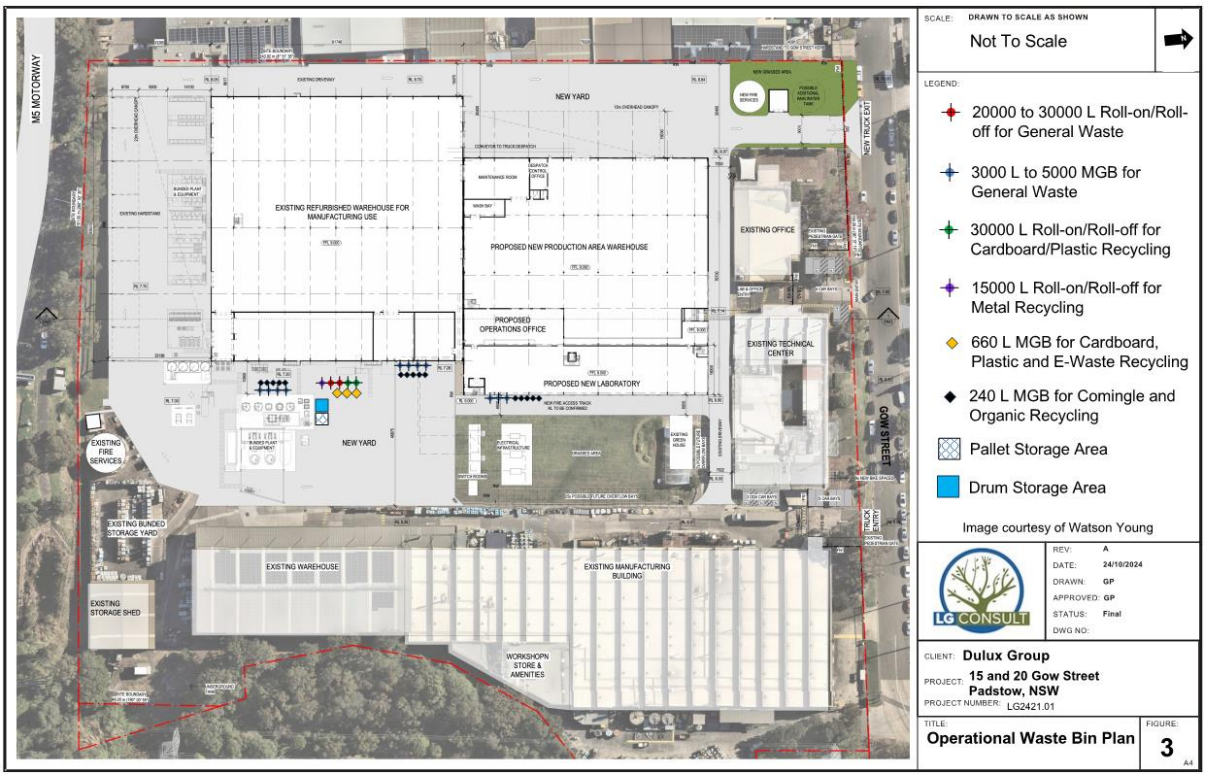


Figure 45. Operational Waste Bin Plan (Source: LG Consult, 2024)

Estimated collection frequency and the number of bins is summarised as follows:

- **Collection frequency:** 1 x weekly all waste streams or as required basis;
- **Number of bins:** 1 x 30,000L + 1 x 20,000L + 1 x 5,000L + 10 x 3,000L general waste, 2 x 30,000L + 2 x 660L cardboard/plastic recycling waste; 1 x 15,000L metal recycling waste; 1 x 660L E-waste recycling waste and 15 x 240L comingle/organic recycling waste;
- **Number of drums:** 341 x 200L empty metal drums, 42 x 200L metal drums filled with chemical waste (stored in pallets) and 36 x 25L empty HDPE drums; and
- **Number of IBCs:** 11 x 1,000L empty IBCs, 2 x 1,000L IBCs filled with chemical waste (stored in pallets).

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

Hazardous Material Survey

Asbestos-containing materials (ACM) and other hazardous materials have been identified at the Subject Site. All such materials will be removed and disposed of prior to demolition or refurbishment in accordance with a site Asbestos Management Plan or Hazardous Materials Management Plan which will be prepared in accordance with the relevant guidelines.

The handling, transportation and disposal of Asbestos Containing Materials (ACMs) shall be conducted in accordance with the requirements of Section 29 of the Protection of the *Environmental Operations (Waste) Regulation 1996*. All tip dockets will be kept and recorded.

6.1.14 Infrastructure Requirements

6.1.14.1 Existing Environment

The existing service infrastructure is documented in **Table 52** and accurately plotted on the detailed site survey, contained within **Appendix 41** of this EIS.

6.1.14.2 Assessment of Impacts

The following table provides an overview of the servicing requirements of the proposed development and any identified impacts to existing infrastructure, as documented in the Infrastructure Services Report (**Appendix 28**) and Hydraulic and Fire Engineering Services Review (**Appendix 26**).

TABLE 526: INFRASTRUCTURE REQUIREMENTS

Infrastructure service	Assessment
Potable Water	The current Sydney Water Potable Water infrastructure comprises of the following assets which are available for connection to the Subject Site: ▪ DN100 Potable Water main (DN100 CICL main, Project Number WO71279, laid in 1937) on the northern side of Gow Street; ▪ DN150 Potable Water main (DN150 CICL main, Project Number WO14770, laid 1961) on the southern side of Gow Street; ▪ DN200 Potable Water main (DN200 CICL main, Project Number WOA14322, laid 1976) on the southern side of Gow Street; and ▪ DN200 Potable Water main (DN200 CICL main, Project Number CASE63578PW, laid 2005) on the southern side of Gow Street. The existing DN200 watermain is assumed sufficient. However, this will be subject to future advice from Sydney Water including a pressure flow inquiry based on calculated usage rates.
Wastewater	The current Sydney Water Wastewater infrastructure comprises of the following assets which are available for connection to the Subject Site: ▪ DN225 main that traverses 15 Gow Street (DN225 PVC main, Plan Number WO45126, laid in 1968) with west to east connection points available, with invert levels ranging from approximately RL 6.28m to RL-0.62m; ▪ DN225 PCS (DN225 VC main, Plan Number WO12197, laid in 1959) currently used to service existing development according to the available Sydney Water Sewerage Service Diagram (SSD) included as Figure 4 below. This has an invert level of RL 5.57m according to Sydney Water Hydra records; ▪ DN225 PCP vertical (DN225 VC main, Plan Number WO45126, laid in 1968). This has an invert level of approximately RL 4.77 as calculated from Hydra data; ▪ DN225 PCS off MH (DN225 VC main, Plan Number WO12155/A, laid 1972) currently used to service existing development according to Sydney Water SSD. This has an invert of approximately RL 4.75m assumed from Hydra; ▪ DN225 PCP sloped (DN225 VC main, Plan Number WO45126, laid 1968). Invert level calculated from hydra is approximately RL-0.20m; ▪ DN900 main (DN900 CONC main, Plan Number WO89445, laid in 1987) follows the eastern boundary of 1-15 Gow Street with inverts ranging from RL-1.97m to RL-2.15m. There are also three DN 225 inlets coming of manholes along this alignment, with the most eastern inlet currently servicing the existing development

	according to the Sydney Water SSD. All invert levels of these inlets are unknown; and ▪ DN225 main end of line (DN225 VC main, Plan Number WO89445, laid in 1987) that enters the north-eastern corner boundary of 20 Gow Street with an invert level of RL 3.34m according to Hydra records. Based on the available levels, it is expected the proposed building will drain by gravity to the existing DN225 VC sewer and DN900 CONC sewer.
Electricity	Ausgrid advised the existing feeders from the Bankstown Zone Subdivision on the opposite side of Gow Steet do not have sufficient capacity to accommodate the requested load of 248A at 11kV. Therefore, two (2) new 11kV feeders are required. This will need to consist of two (2) 500mm^2 Al3 and/ or 300mm2 Cu triplex cables (or equivalent) from the Bankstown Zone Subdivision to the Subject Site.
Gas	An existing 250mm steel 1050kPa high-pressure gas main is located in Gow Street which will not be impacted the proposed development.
Telecommunications	The Subject Site is adequately serviced by the existing NBN cables.
Fire Hydrant	A new hydrant system is required to cater for the proposed development with a demand of 30L/s at 250kPA. A new DN150, 4-Point hydrant booster assembly with a DDCV backflow prevention device shall be installed. In addition, a new fire sprinkler system will be required to installed in accordance with the relevant Australian Standards.

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

6.1.15 Aboriginal Cultural Heritage

An Aboriginal Cultural Heritage Assessment Report (ACHAR) and Archaeological Repot (AR) have been prepared by Biosis and are provided in **Appendices 2** and **7** of this EIS.

6.1.15.1 Existing Environment

A search of the Heritage NSW AHIMS database was undertaken on 14 June 2024 by Biosis. The AHIMS search identified a total of 87 registered sites within a 5km-by-5km search area, centred on the Subject Site. None of these sites were identified within the Subject Site

The number of sites, site types and the percentage of the total is shown in **TABLE 53** below: **Figure 46** shows the distribution of previously recorded sites across the landscape.

TABLE 53: IDENTIFIED AHIMS SITES

Site Area	Number of Occurrences	Frequency (%)
Art (Pigment or Engraved)	44	35.77
Artefact	41	33.33
Shell	25	20.33
PAD	5	4.07
Grinding Groove	4	3.25
Modified Tree (Carved or Scarred)	2	1.63
Habitation Structure	1	0.81
Burial	1	0.81
Total	**123**	**100**

A simple analysis of the Aboriginal cultural heritage sites registered within the 5km-by-5km buffer indicates that the most common site features are art (pigment and engraving) sites, accounting for 35.77% (n=44), artefact sites accounting for 33.33% (n=41), and shell sites representing a further 0.33% (n=25) of total sites in the area. The remaining sites, in descending order of frequency were PAD with 4.07% (n=5), grinding grooves with 3.25% (n=4), modified tree (carved or scarred) with 1.63% (n=2), habitation structure with 0.81% (n=1), and a burial site with 0.81% (n=1).

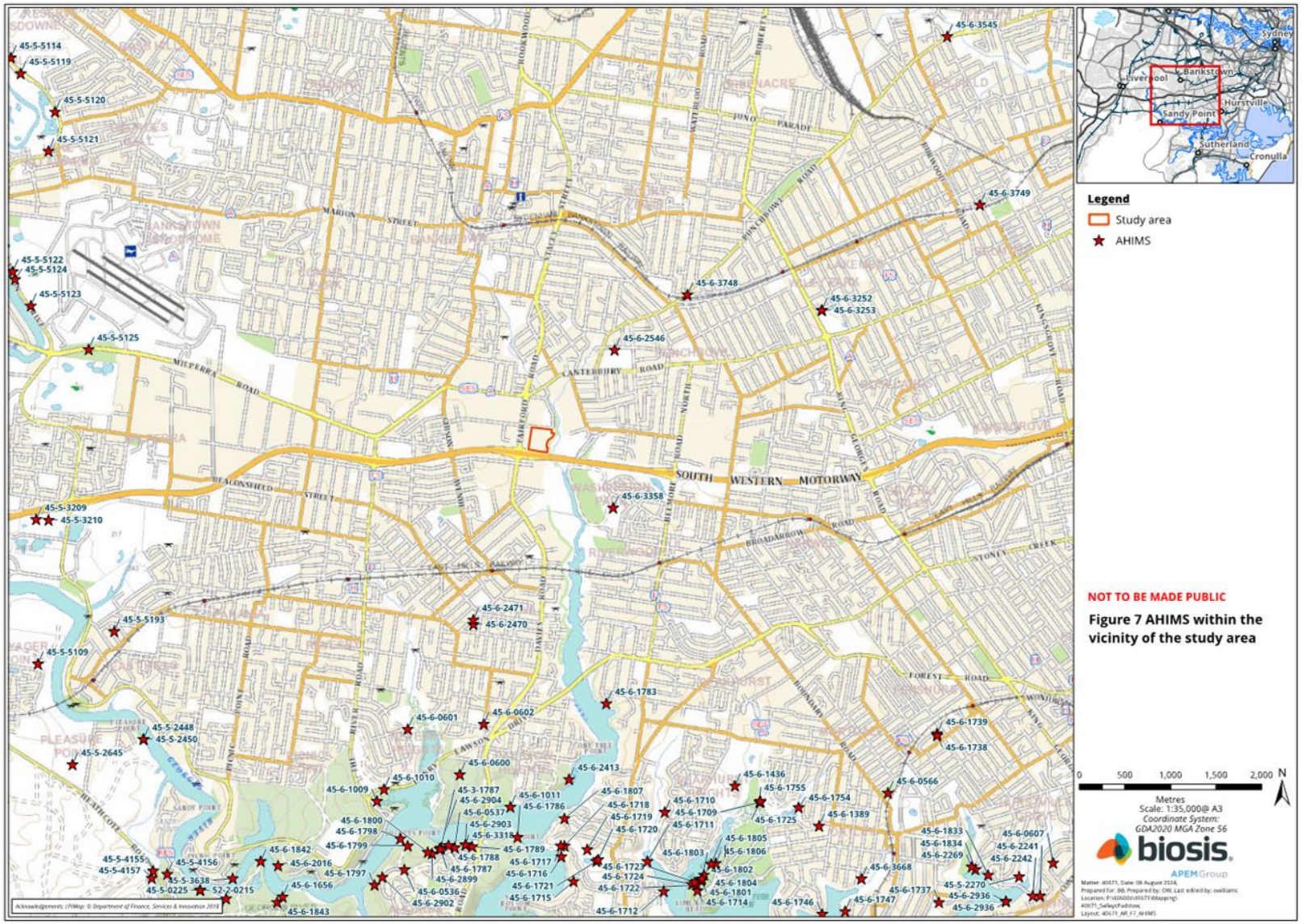


Figure 46. Identified AHIMs Sites (Source: Biosis, 2024)

A field survey of the Subject Site was undertaken by Biosis on 9 August 2024 aiming to assess and understand the landforms and to determine whether any archaeological material from Aboriginal occupation or land use exists within the Subject Site.

The archaeological survey consisted of a meandering pedestrian transect across the Subject Site, in areas which were not obscured by buildings. During the archaeological survey no non-Aboriginal items or places were identified. Observations from the archaeological survey indicate that the Subject Site as a whole has been subject to significant disturbance. The land within the Subject Site has been flattened and severely modified via past earthworks. This severe modification of the natural landform can be seen in numerous locations across the Subject Site.

The results from the field survey have been summarised in **TABLE 54** and **TABLE 55**.

TABLE 54: ARCHAEOLOGICAL SURVEY EFFECTIVE COVERAGE

Landform	Area (m^2)	Visibility (%)	Exposure (%)	Effective Coverage Area (m^2)	Effective Coverage (%)
Flat	4,969	10	10	49.70	1

TABLE 55: ARCHAEOLOGICAL SURVEY LANDFORM SUMMARY

Landform	Area (m^2)	Area Effectively Survey (m^2)	Landform Effective Surveyed (%)	No. of Aboriginal Sites	No. of Artefacts or Features
Flat	4,969	49.70	1	0	0

Aboriginal Cultural Significance

The significance of the Subject Site was assessed in accordance with the following criteria:

- Requirements of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW*;
- The Burra Charter; and
- *Guide to Investigating and Reporting on Aboriginal Heritage*.

The Subject Site is positioned on a modified flat landform 80m from Salt Pan Creek, within the disturbed terrain soil landscape. There has been significant development and disturbance to the study area that has occurred since the early 1950s. From the mid-20th century, development accelerated substantially, with there being a high likelihood that A horizon soils have been removed. No Aboriginal sites or areas of archaeological potential were identified as part of this assessment due to the environmental context and significant levels of disturbance across the Subject Site. This has determined that the study area has low scientific significance. The Subject Site is considered to have low aesthetic significance due to the significant development current use of the Subject Site by industrial operations. The significance against the relevant assessment criteria is summarised as follows:

6.1.15.2 Assessment of Impacts

No Aboriginal sites, objects or areas of archaeological potential were identified as part of this assessment. Therefore, the proposed development may proceed subject to the implementation of the management and mitigation measures presented below.

6.1.15.3 Management and/or Mitigation Measures

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

Continued Consultation with the Registered Aboriginal Stakeholders

As per the consultation requirements, a copy of the final ACHAR should be provided to Registered Aboriginal Parties (RAPs) for their records. The proponent should continue to inform these groups about the management of Aboriginal cultural heritage sites within the study area throughout the life of the project, should any sites be identified during the remainder of this assessment or during the proposed works.

Heritage Induction for all Contractors

Heritage inductions for all site workers and contractors should be undertaken to prevent any unintentional harm to any unexpected Aboriginal objects. The heritage induction should include the following items:

- Relevant legislation;
- Location of identified Aboriginal heritage sites, and areas of archaeological sensitivity within proximity to the Subject Site;
- Basic identification skills for Aboriginal and non-Aboriginal artefacts, and human remains;
- Procedure to follow in the event of an unexpected heritage item find during construction works;
- Procedure to follow in the event of discovery of human remains during construction works; and
- Penalties and non-compliance.

Discovery of Unanticipated Aboriginal Objects

All Aboriginal objects and Places are protected under the New South Wales *National Parks and Wildlife Act 1974*. It is an offence to disturb an Aboriginal site without a consent permit issued by Heritage NSW, NSW Department of Climate Change, Energy, the Environment and Water (Heritage NSW). Should any Aboriginal objects be encountered outside of the Subject Site during works, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist. If the find is determined to be an Aboriginal object, the archaeologist will provide further recommendations. These may include notifying Heritage NSW and RAPs.

Discovery of Unanticipated Historical Relics

Relics are historical archaeological resources of local or State significance and are protected in New South Wales under the *Heritage Act 1977*. Relics cannot be disturbed except with a permit or exception/exemption notification. Should unanticipated relics be discovered during the project, work in the vicinity must cease and an archaeologist contacted to make a preliminary assessment of the find. The Heritage Council will require notification if the find is assessed as a relic.

Discovery of Human Remains

If any suspected human remains are discovered during any activity works, all activity in the vicinity must cease immediately. The remains must be left in place and protected from harm or damage. The following contingency plan describes the immediate actions that must be taken in instances where human remains or suspected human remains are discovered. Any such discovery at the Subject Site must follow these steps:

1. Discovery: If suspected human remains are discovered all activity in the vicinity must stop to ensure minimal damage is caused to the remains; and the remains must be left in place and protected from harm or damage.
2. Notification: Once suspected human skeletal remains have been found, the Coroner's Office and the NSW Police must be notified immediately. Following this, the find will be reported to the Aboriginal parties and Heritage NSW.

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

6.1.16 Non-Aboriginal Cultural Heritage

6.1.16.1 Existing Environment

No part of the Subject Site is included on any statutory or non-statutory heritage lists nor are any sites within 1.5km of the Subject Site. A Historical Archaeological Assessment has been prepared by Biosis and provided in **Appendix 25** of this EIS.

6.1.16.2 Assessment of Impacts

No further historical heritage assessment is required within the Subject Site.

During the archaeological survey no non-Aboriginal items or places were identified. Observations from the archaeological survey indicate that the Subject Site as a whole has been subject to significant disturbance. The land within the Subject Site has been flattened and severely modified via past earthworks. This severe modification of the natural landform can be seen in numerous locations across the Subject Site.

6.1.16.3 Management and/or Mitigation Measures

If historical archaeological relics not assessed or anticipated are found during the proposed works, all works in the immediate vicinity are to cease immediately and the Heritage Division of the Office of Environment and Heritage is to be notified. A qualified archaeologist is to be contacted to assess the situation and consult with the Heritage Division of the Office of Environment and Heritage regarding the most appropriate course of action.

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

6.1.17 Biodiversity

A BDAR has been prepared by Ecologique and is provided in **Appendix 10** of this EIS. In addition, an Arboricultural Impact Assessment Report has been prepared by Capability Green Consulting and provided in **Appendix 6** of this EIS.

6.1.17.1 Existing Environment

Native vegetation within the Subject Site comprises native tree species in garden beds, adjacent car parks, buildings and access roads. The State Vegetation Type Map (SVTM) does not identify any native vegetation occurring within the Subject Site or adjacent Salt Pan Creek riparian corridor.

24 tree species have been identified within the Subject Site and are detailed in **TABLE 56** below including their habitat requirements.

TABLE 56: TREE SPECIES WITHIN THE SUBJECT SITE

Species	Common Name	Status
Local Native		
Allocasuarina torulosa	Forest oak	Unlikely to have occurred at this location: Open forest and on rainforest fringes in moister, nutrient rich soils at altitudes from 40 to 1,200 m
Callistemon citrinus	Crimson bottlebrush	Unlikely to have occurred at this location: Widespread and locally common in swamps near coast and along rocky watercourses.
Callistemon salignus	Willow bottlebrush	Potential habitat in adjacent riparian corridor: Mostly grows in low-lying river flats and damp creeks, rarely in dry areas
Casuarina glauca	Swamp oak	Habitat present in adjacent riparian corridor: In brackish situations along coastal streams
Cupaniopsis anacardioides	Tuckeroo	Unlikely to have occurred at this location: In littoral rainforest and scrub near the sea and along estuaries
Eucalyptus amplifolia	Cabbage gum	Habitat present in adjacent riparian corridor: Locally dominant, in grassy woodland on deeper, loamy soils, usually on low sites or along watercourses
Eucalyptus globoidea	White stringybark	Habitat present in adjacent riparian corridor: Locally frequent, in dry sclerophyll forest or woodland on well-watered sandy or alluvial soils of moderate fertility
Eucalyptus piperata	Sydney peppermint	Potential habitat in adjacent riparian corridor: Locally frequent, in dry sclerophyll forest or woodland on moderately fertile often alluvial sandy soil
Eucalyptus resinifera	Red mahogany	Unlikely to have occurred at this location: Locally abundant, in wet or dry sclerophyll forest on deeper soils of medium to high fertility
Melaleuca linariifolia	Flax-leaved paperbark	Potential habitat in adjacent riparian corridor: Grows in heath and dry sclerophyll forest in moist or swampy ground
Melaleuca quinquenervia	Broad-leaved paperbark	Unlikely to have occurred at this location:

		Widespread in coastal swamps and around lake margins, north from Botany Bay
Melaleuca styphelioides	Prickly-leaved paperbark	Potential habitat in adjacent riparian corridor: Grows in moist situations, often along stream banks
Melia azedarach	White cedar	Unlikely to have occurred at this location: Grows in subtropical and dry rainforest, mostly on margins and in regrowth; widely cultivated, occasionally naturalized
Non-Local Native		
Brachychiton rupestris	QLD bottle tree	Endemic to a limited region of Australia namely Central QLD through to northern NSW
Callistemon viminalis	Weeping bottlebrush	Occurs north from the Gloucester area.
Leptospermum petersonii	Lemon-scented teatree	Occurs north from Port Macquarie

Records from the BioNet Atlas of NSW Wildlife returned a total of 3,993 records of 67 threatened species. 42 of those would not occur on the Subject Site as they require aquatic habitats. A further 21 flora species were not found to occur on the Subject Site. The remaining 25 species are listed in **TABLE 57** below.

TABLE 57: THREATNED SPECIES

Scientific Name	Common Name	Status	
		BC Act	EPBC Act
Aves			
Artamus cyanopterus	Dusky Woodswallow	V	
Burhinus grallarius	Bush Stone-Curlew	V	
Daphoenositta chrysoptera	Varied Sittella	V	
Glossopsitta pusilla	Little Lorikeet	V	
Hirundapus caudacutus	White-throated Needletail	V	V, Mig
Lathamus discolor	Swift Parrot	E	CE
Lophochroa leadbeateri	Pink Cockatoo	V	
Lophoictinia isura	Square-tailed Kite	V	
Ninox strenua	Powerful Owl	V	
Petroica phoenicea	Flame Robin	V	
Tyto novaehollandiae	Masked Owl	V	
Tyto tenebricosa	Sooty Owl	V	
Mammalia			
Cercartetus nanus	Eastern Pygmy-Possum	V	
Chalinolobus dwyeri	Large-Eared Pied Bat	E	E
Falsistrellus tasmaniensis	Eastern False Pipistrelle	V	
Isoodon obesulus obesulus	Southern Brown Bandicoot (eastern)	E	E
Micronomus norfolkensis	Eastern Coastal Free-Tailed Bat	V	
Miniopterus orianae oceanensis	Large Bent-Winged Bat	V	
Myotis macropus	Southern Myotis	V	
Phascolarctos cinereus	Koala	E	E
Pteropus poliocephalus	Grey-headed Flying-fox	V	V

Saccolaimus flaviventris	Yellow-Bellied Sheathtail-bat	V	
Scoteanax rueppellii	Greater Broad-Nosed Bat	V	
Gastropoda			
Meridolum corneovirens	Cumberland Plain Land Snail	E	

Note: V: Vulnerable E: Endangered CE: Critically Endangered Mig: Migratory

The 17 bird species listed require woodland or forest habitats for all or part of their life cycles and may potentially use the adjacent riparian corridor and canopy trees within the Subject Site along the eastern boundary with the corridor. The grey-headed flying fox may forage on canopy trees when in flower, but the Subject Site is unlikely to be important to the species and the proposal will not remove any optimal foraging tree species.

Several microbat species listed have the potential to use buildings and other human man structures as surrogate cave habitat. A targeted microbat survey of the buildings that will be demolished did not find any evidence to suggest past use of these structures, such as guano accumulations, characteristic staining, or deceased animals, and no calls recorded on the echolocation detector. Detail on the survey methods used, and results of, the microbat survey are provided in Appendix B of **Appendix 10**.

No other species listed above are considered likely to occur on the Subject Site, and the proposal is considered unlikely to impact on any threatened species. The habitat requirements of all species returned from the Bionet search are provided in Appendix D of **Appendix 10**.

6.1.17.2 Assessment of Impacts

Prescribed Impacts

The proposed development would not result in any prescribed impacts on the habitat of threatened species or ecological communities that is not directly caused as a result of vegetation clearing pursuant to Clause 6.1 of the *Biodiversity Conservation Regulation 2017* (BC Regs).

Avoiding or Minimising Impacts

At 60 years of age, the existing factory is not fit for future purpose and nearing the end of its useful life. It is capacity constrained with product quality a challenge. It will struggle to meet the volume growth challenges and the transition to new hybrid and acrylic technologies and in turn, technologies that are less impacted on the impacting on the environment.

The proposal avoids clearing of native vegetation and other direct disturbances to the environment through redevelopment of existing buildings and hardstand.

Direct Impacts

The proposed development requires the removal of 15 trees as summarised below. All are of planted origin and do not represent a native plant community.

TABLE 58: VEGETATION TO BE CLEARED	
Species	**Reason**
Native Species	
Callistemon citrinus (crimson bottlebrush) x two (2) trees	Construction impacts
Callistemon salignus (weeping bottlebrush)	Construction impacts
Leptospermum petersonii (lemon-scented tea tree)	Construction impacts
Casuarina glauca (swamp oak)	Near dead, recommended for removal
Casuarina glauca (swamp oak)	Majority of tree canopy overhangs adjacent driveway. Included junction.
Melaleuca styphelioides (prickly paperbark) x two (2) trees	Dead.
Eucalyptus piperata (Sydney peppermint)	Previously topped for transmission wires. Extensive branch dieback, borer damage and epicormic growth evident.
Eucalyptus globoidea (white stringybark)	Previously topped for transmission wires. Epicormic growth evident. Wound to main branch junction.
Eucalyptus globoidea (white stringybark)	Previously topped for transmission wires. Wound and fungal fruiting body at included branch junction.
Eucalyptus resinifera (red mahogany)	Previously pruned away from transmission wires. Extensive branch dieback evident. Included junctions.
Eucalyptus resinifera (red mahogany)	Previously topped for transmission wires. Large branch tear wound and large deadwood hanger within canopy.
Melia azedarach (white cedar)	Majority of tree canopy overhangs adjacent driveway. One leader died back to root crown.
Melia azedarach (white cedar)	Previously topped for transmission wires. Majority of tree canopy overhangs adjacent driveway
Exotic Species	
Citrus reticulata (mandarin)	Construction impacts
Thuja Sp. (abrovitae) x two (2) trees	Construction impacts
Photina glabra (Japanese Photinia)	Exempt tree, previously lopped in poor condition

Indirect Impacts

The proposed development will prevent indirect impacts on biodiversity values, through the following:

- Erosion and sediment controls;
- Pre-clearance and clearance procedures;
- Vegetation protection; and
- Biosecurity risk management (such as priority weeds, pest animals, pathogens, and disease).

The majority of the proposed works are located away from the riparian corridor and therefore minimises the risk of indirect impacts on native vegetation and the habitat it may provide. **TABLE 59** below provide of summary of impacts identified in the NSW Biodiversity Assessment Method (BAM) that must be considered.

TABLE 59: ASSESSMENT OF INDIRECT IMPACTS			
Indirect Impact	**Duration**	**Biodiversity Values Impact**	**Consequence**
Erosion and sedimentation	Short term during construction	Salt Pan Creek and riparian corridor	Construction works can expose soils and subsoils, which following rainfall may erode and mobilise soils in runoff, potentially smothering ground layer vegetation (in turn affecting health through a decrease in photosynthesis) or impact on water quality in downstream aquatic ecosystems (in turn affecting aquatic organisms that may provide a food resource for native fauna). Providing that best practises in erosion and sedimentation management are implemented in the accordance with Erosion and Sediment Control Plan the consequence of this impact is considered a low risk.
Introduction of weeds and Pathogens	Short term during construction	General environment	Construction activities have the potential to both spread existing weed infestations, introduce new weed species and introduce or spread soil borne pathogens on machinery and equipment. Providing that the mitigation measures recommended below are implemented the consequence of this impact is considered a low risk.
Trampling or other damage to remnant vegetation, including threatened species	Short term during construction	General environment	Not applicable, retained vegetation is protected by fencing and not in the vicinity of the construction works areas.
Fertiliser drift	N/A	N/A	Fertiliser will not be used.
Rubbish dumping, wood collection, removal, and disturbance of rocks, including bush rock	N/A	N/A	The Subject Site will not be accessible by the public (through security fencing) and the consequence of this impact is considered a low risk.
Dust	Short term during construction	General environment	Dust generation during construction activities will be managed through the following measures: ▪ Construction staging; ▪ Minimising material stockpiles; ▪ Speed restrictions; and ▪ Implementation of mitigations measures prescribed within the CMP. The proposal is considered unlikely to result in adverse effects from dust generation
Light spill	Long term	General environment	The proposal is unlikely to result in an increase in light levels above that which already exists.

Noise	Short term during construction	General environment	All construction works are proposed to be undertaken during standard construction hours, i.e.: ▪ Monday to Friday, 7.00am to 6.00pm; ▪ Saturday 8.00am to 1.00pm; and ▪ No work on Sundays or public holidays. The proposed construction is temporary in nature and the risk of consequence is considered low. Long term operation is considered unlikely to result in a significant increase in noise levels above that which already exists and is considered a low risk.
Increased risk of starvation, exposure, loss of shade or shelter	N/A	General environment	The proposal would not result in any significant change in any existing food resources, shade or shelter.
Loss of breeding habitat	N/A	N/A	Breeding habitat for threatened species is absent from the Subject Site.
Habitat connectivity			
Habitat connectivity	N/A	N/A	Breeding habitat connectivity will not be impacted by the proposed development. Tree removal proposed along the eastern boundary of the Subject Site is limited to those trees in poor health that are already impacted from lopping/trimming for overhead powerlines. Their removal would have a negligible impact on habitat and habitat connectivity.
Water bodies, water quality and hydrological processes			
Water bodies, water quality and hydrological processes	Short and long term	Aquatic ecosystems downstream of stormwater network.	The Subject Site does not contain waterbodies or drainage lines. Stormwater runoff generated from the proposal is anticipated to have a low-risk consequence with design complying with CBDCP2023.

Serious and Irreversible Impacts

Not applicable. The Subject Site does not contain habitat for any threatened species, populations or communities that are at risk of a serious and irreversible impact (SAII).

Impacts that Require an Offset

Not applicable. The proposal does not result in impacts on biodiversity values that require an offsetting obligation under the NSW Biodiversity Offset Scheme.

Impacts that do not Require an Offset

The proposed removal of planted native vegetation does not require an offsetting obligation under the NSW Biodiversity Offset Scheme.

Impacts that do not Require Further Assessment

All direct impacts and indirect impacts have been considered in this BDAR. No additional impacts require further assessment.

6.1.17.3 Management and/or Mitigation Measures

TABLE 60 below provides an overview of the proposed construction and operational mitigation measures.

TABLE 60: MITIGATION MEASURES FOR IMPACTS TO NATIVE VEGETATION AND HABITAT						
Mitigation Measures	**Proposed Technique**	**Timing**	**Frequency**	**Responsibility**	**Risk of Failure**	**Risk and Consequences of Residual Impacts**
Erosion and sediment controls	Implementation of Erosion and Sediment Control Plan measures	Pre-construction	Ongoing	Contractor	High	Sedimentation / smothering of offsite native vegetation or pollution of downstream aquatic environments.
Pre-clearance surveys	The pre-clearing process provides a final check for the presence of flora and fauna species and habitat features on-site immediately before clearing begins. ▪ Pre-clearing surveys are required to: ▪ Identify any habitat features or fauna present in vegetation to be cleared; ▪ Mark habitat features that will be cleared, using suitable methods; ▪ Locate nearby habitat suitable for the release of fauna that may be encountered during the pre-clearing or clearing stages; and ▪ Locate suitable areas for relocation of habitat features if any (e.g., large woody debris).	Pre-construction	Once	Contractor / Project Ecologist	Moderate	Habitat features not identified Harm / death of fauna Woody weeds inadvertently chipped and reused on-site as mulch
Clearance	Where habitat features are identified in pre-clearing surveys, a two-staged clearance process shall be undertaken and an experienced ecologist present to supervise the process, act as a fauna spotter and relocate any fauna captured.	Pre-construction	Once	Contractor / Project Ecologist	Moderate	Harm / death of fauna
Biosecurity management	Implementation of hygiene measures to prevent the introduction and / or spread of introduced flora and fauna species, pathogens and / or disease.	Throughout	Ongoing	Contractor / Principal	Moderate	Introduction and/or spread of pest species, pathogens, disease, and in turn harm death of adjacent flora and fauna

6.1.18 Social

A robust Social Impact Assessment and Engagement Report has been undertaken in accordance with the *Social Impact Assessment Guidelines for State Significant Projects* by HillPDA, as contained within **Appendix 40** of this EIS. A summary of the Social Impact Assessment is provided below:

TABLE 61: SOCIAL IMPACT EVALUATION AND MITIGATION RESPONSE - CONSTRUCTION				
Detail	**Evaluated**	**Standard Measures**	**Project Specific Mitigation Measures**	**Residual Impact Significance**
Way of Life				
Noise and vibration from construction activity may negatively affect amenity for residents, workers and businesses surrounding the Subject Site, impacting upon quiet enjoyment of surroundings, way of life and health and wellbeing. This impact is most likely to affect workers at neighbouring businesses.	Likely + Minor = Medium (negative)	When planning construction work that will generate significant noise or vibration, consider: ▪ Substitution by an alternative process. ▪ Restricting times when work is carried out. ▪ Screening or enclosures. Utilisation of temporary supports where deemed necessary. Carry out demolition activity in accordance with the approved work hours.	Implement the recommended mitigation measures from the NVIA Implement the recommendations from the TIA	Possible + Minor = Medium (negative)
Community				
None identified				
Access				
Additional construction vehicle movements may increase congestion on surrounding roads, impacting way of life, access and livelihoods for surrounding residents, workers, and businesses.	Possible+ Minor = Medium	Manage access to/from adjacent properties Restrict construction vehicle movements to designated routes to/from the Subject Site. Manage and control construction vehicle activity in the vicinity of the Subject Site. Provide an appropriate and convenient environment for pedestrians and minimise the impact on pedestrian movements.	Encourage the use of public transport for workers Notify neighbouring residents, businesses, and any other potentially impacted premises of any changes to access. Implementation of measures identified in the CTMP to mitigate the impact of construction-related vehicle movements on access	Unlikely + Minor = Low (negative)
Impacts to surrounding businesses and pedestrians from changed access during construction, potentially affecting livelihoods and way of life.	Possible + Minor = Medium (negative)			Unlikely + Minor = Low (negative)

		Maintain appropriate capacity for pedestrians at all times on footpaths adjacent to the Subject Site. Maintain appropriate public transport access. Carry out demolition activity in accordance with the approved work hours.		
Potential changes to access for surrounding businesses and residences from parking for workers on-site during construction, impacting way of life and access.	Unlikely + Minor = Low (negative)	Ensure dedicated parking is provided for workers, or that they are encouraged to travel via alternative means (eg public transport).	A detailed CTMP will be prepared following the approval of the DA detailing all parking allocations for construction workers. According to the Preliminary CTMP, a small amount of on-site parking for key contractors and staff is expected to be provided throughout the construction works. It is noted the Subject Site is within 400m straight line distance to various bus stops, therefore the use of public transport and carpooling will be actively encouraged to reduce the reliance on private vehicles and minimise parking demands.	Unlikely + Minor = Low (negative)
Culture				
Potential impact on community and culture through fear of impacts to Aboriginal cultural heritage sites during construction.	Unlikely + Minor = Low (negative)	Engagement with Local Aboriginal Land Council Adherence to requirements under AHIP (if required)	Implementation of the recommendations identified in the ACHA A copy of the ACHA report to be forwarded to all Aboriginal stakeholder groups who have registered an interest in the project	Unlikely + Minor = Low (negative)
Potential impact on local cultural values through fear of impacts to historical cultural heritage sites during construction.	Very unlikely + Minimal = Low (negative)	Implementation of an unexpected finds protocol. .	None required	Very unlikely + Minimal = Low (negative)

Health and Wellbeing				
Dust from construction activity could cause a decline in air quality, potentially impacting the amenity of surroundings and health and wellbeing of neighbouring residents and workers.	Possible + Moderate = Medium (negative)	Construction phase air quality impacts shall be minimised or avoided by incorporation of appropriate dust suppression and air quality control measures at various stages of the development.	Implement of AQIA mitigation measures	Unlikely + Minor = Low (negative)
Vehicle movements associated with construction activity could have negative impacts upon human health during construction	Possible + Moderate = Medium (negative)	CEMP	Implement of AQIA mitigation measures	Unlikely + Minor = Low (negative)
Reduced road safety at key intersections and locations resulting from increased heavy vehicle construction traffic movements and high pedestrian activity.	Possible + Moderate = Medium (negative)	None	Implementation of measures identified as part of the preliminary CTMP to improve safety around vehicle access points to the Site during construction	Unlikely + Minor = Low (negative)
Construction activities and truck movements could impact safety of pedestrians	Possible + Moderate = Medium (negative)	None	Implement of measures from the CTMP	Unlikely + Minor = Low (negative)
Surroundings				
Clearing of trees required to facilitate the construction of the proposed development would temporarily reduce the quantity of natural environment features in the surroundings of the Subject Site, reducing aesthetic value and amenity.	Almost certain + Minimal = Low (negative)	Retain street trees where possible.	Undertake planting in according the Landscape Plans	Very unlikely + Moderate = Low (positive)
Livelihoods				
Additional employment opportunities on-site arising from construction activity (direct and indirect) positively impacting livelihoods	Almost Certain + Major = Very High (positive)	Nil	Nil	Almost Certain + Major = Very High (positive)

Decision Making Systems				
Potential feeling of powerlessness or lack of means to have input or say on the proposal during construction for surrounding properties and the wide community, negatively impacting decision-making systems	Possible + Minor = Medium (negative)	Standard engagement mechanisms as part of SSDA process	Implementation of a construction stakeholder communications plan.	Unlikely + Minor = Low (negative)

TABLE 62: SOCIAL IMPACT EVALUATION AND MITIGATION RESPONSE - OPERATION				
Detail	**Evaluated**	**Standard Measures**	**Project Specific Mitigation Measures**	**Residual Impact Significance**
Way of Life				
Noise emissions from the operation of the warehouse and distribution facility could potentially impact residents, workers and businesses (on-site and surrounding) way of life, health and wellbeing, and enjoyment of surroundings	Unlikely + Minimal = Low (negative)	Locating mechanical equipment as far as practicable from noise sensitive receivers Using in-duct treatments such as internally lined ductwork or silencers Building barriers or enclosures around equipment.	As the NVIA found that no exceedances of the project noise trigger levels are predicted, no additional mitigation is required	Unlikely + Minor = Low (negative
Community				
None identified				
Access				
Impact to surrounding parking availability associated with under provision of parking spaces as per CBDCP2023 requirements, impacting accessibility and way of life for surrounding residents, workers and visitors, and livelihoods for nearby businesses who rely on existing parking.	Possible + Moderate = Medium (negative)	Parking is to be constructed in line with relevant requirements for the uses on-site Information regarding public transport options is to be made available for workers on site.	As demonstrated in the TIA, the proposed shortfall in parking is considered acceptable.	Unlikely + Minor = Low (negative)
Culture				
None identified				

Health and Wellbeing				
Dust from on-site activity could cause a decline in air quality, potentially impacting the amenity of surroundings and health and wellbeing of neighbouring residents and workers.	Possible + Moderate = Medium (negative)	Air quality impacts shall be minimised or avoided by incorporation of appropriate dust suppression and air quality control measures at various stages of the project.	Implementation of measures identified as part of the preliminary CTMP	Unlikely + Minor = Low (negative)
Impact to nearby residents' health and wellbeing as a result of loud and/or continuous noise.	Possible + Minor = Medium (negative)	Locating mechanical equipment as far as practicable from noise sensitive receivers Using in-duct treatments such as internally lined ductwork or silencers Building barriers or enclosures around equipment.	As NVIA found that no exceedances of the project noise trigger levels are predicted, no additional mitigation is required	Very unlikely + Minimal = Low (negative)
Release of hazardous building materials could potentially impact the health and wellbeing of neighbouring residents and workers.	Possible + Moderate = Medium (negative)	Construction phase air quality impacts shall be minimised or avoided by incorporation of appropriate dust suppression and air quality control measures at various stages of the development	Implement measures outlined in the PHA	Possible + Minor = Low (negative)
Surroundings				
Increased intensity of development at the Subject Site could improve passive surveillance in the area, increasing safety.	Possible + Minimal = Low (positive)	Nil	The development would be constructed and operated to be secure and well-illuminated The design incorporates Crime Prevention Through Environmental Design (CPTED) principles in building design.	Possible + Minimal = Low (positive)
Potential impacts to the surroundings (and community) for local residents through visual impacts and changes to visual amenity associated with the proposed development.	Likely + Minor = Medium (negative)	• Ensure retention of existing trees on-site where possible Maximise opportunities to contribute to landscape setting and urban tree canopy through plantings and landscaping.	Implementation of the mitigation measures as identified in the VIA	Possible + Minimal = Low (positive)
Livelihoods				

Additional employment opportunities on site arising from operational activity (direct and indirect), positively impacting livelihoods (and way of life) in the study area and beyond	Likely + Moderate = High positive)	Nil	Nil	Likely + Moderate = High (positive)
Decision Making Systems				
Potential feeling of powerlessness or lack of means to have input or say during operations, negatively impacting decision-makings systems .	Unlikely + Moderate = Medium (negative)	Nil	The POM should identify a transparent process for resolving complaints by neighbours and community members. This process should be transparent, with clear timeframes for resolution of matters, as well as a clear system tenant management where breaches to the code of conduct occur.	Unlikely + Minor = Low (negative)

6.1.19 Ecologically Sustainable Development

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

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

Overall, through the implementation of the initiatives noted within the ESD Report prepared by DSA Consulting (**Appendix 18** of this EIS), the proposed development clearly demonstrates the commitment to ESD principles throughout the design, construction, and operation. Additionally, the project design team has worked to optimise the developments energy performance, address key climate related risks posed to the Subject Site and align the project to the NSW Government's commitment to carbon neutrality by 2050.

The Sustainable Buildings SEPP encourages the design and delivery of more sustainable buildings across NSW. It sets sustainability standards for both residential and non-residential development and contributes to NSW's target of achieving net zero by 2050. Specifically, Chapter 3 relates to standards for non-residential development. Detailed assessment of the proposed development against the relevant provisions of the Chapter 3 of the Sustainable Buildings SEPP has been undertaken in **Table 63** below:

TABLE 63: SUSTAINABLE BUILDINGS SEPP ASSESSMENT

Clause	Comment
3.2 Development consent for non-residential	
(1) In deciding whether to grant development consent to non-residential development, the consent authority must consider whether the development is designed to enable the following—	-
(a) the minimisation of waste from associated demolition and construction, including by the choice and reuse of building materials,	Further to the Operational & Construction Waste Management Plans provided in **Appendices 14** and **31**, the management of materials will follow the principles of ESD and a waste minimisation hierarchy. The hierarchy for waste minimisation is as follows: ▪ Finding or adapting products after their initial use so that they have the same, similar or alternative uses, thus extending the life of a product; and ▪ Recycle - a process by which materials that would otherwise become solid waste are collected, separated, processed and returned to the economic mainstream in the form of raw materials or product. Opportunities to reuse materials on this project are limited. However, consideration has been made to reuse excavated soil on-site and crushing existing hardstand so there is minimal import or export of material to obtain the correct site elevations. Consideration will also be given to and include:

	▪ When practicable, maximising opportunities to generate less waste, such as wrapping/packaging to be returned to the supplier, recyclable or biodegradable/compostable. The waste management procedures identified are incorporated into the waste disposal objectives and targets. ▪ Avoiding unnecessary waste creation; ▪ Minimising consumption of resources by ordering only required amounts of materials; and ▪ A Waste Management Plan will be developed by the preferred Waste disposal contractor, Vaughan Constructions preferred Waste Disposal contractor is Garbage Guts.
(b) a reduction in peak demand for electricity, including through the use of energy efficient technology,	The laboratory and office building will be provided with 4-pipe chiller/heat pumps which will be more efficient than a traditional heating and cooling system. The cooling and heating chillers will be 4-pipe allowing the heating to be produced as an output of the cooling without rejection to the atmosphere. The COP (coefficient of performance) for heat pump would be around 3 with a Total Efficiency Ratio (TER) of around 5.9. Variable speed drives will be provided on the pumps so pump energy can be reduced according to actual building load. Air handling systems will include outside air economy cycles to provide free cooling. High efficiency variable speed EC fans will be used. The domestic hot water will be produced by energy efficient electric heat pumps. The ductwork/pipe work insulation will be 10% higher than the NCC section J requirement to reduce the energy lost. Shading and double glazed thermally broken suites will be used on the façade.
(c) a reduction in the reliance on artificial lighting and mechanical heating and cooling through passive design,	Lighting will be controlled in the building corridors and entrances with light level PE control and occupancy control.
(d) the generation and storage of renewable energy,	470 kW of PV will be provided as part of the development. No storage is proposed at this stage of the development.
(e) the metering and monitoring of energy consumption,	All electrical boards will be provided with energy metering as per NCC requirement and

	monitored by the BMCS on an energy monitoring system.
(f) the minimisation of the consumption of potable water.	Water efficiency is included within the design of the building to reduce the use of local potable water within the Canterbury-Bankstown LGA. This proposed development will incorporate efficient fittings and fixtures designed to minimise water use within the building.
(2) Development consent must not be granted to non-residential development unless the consent authority is satisfied the embodied emissions attributable to the development have been quantified.	A NABERS Embodied Emissions Material Form has been provided in **Appendix 19**.

6.1.20 Planning Agreement/Development Contributions

The proposed development is subject to the following contributions plan:

- *Canterbury-Bankstown Local Infrastructure Contributions Plan 2022*; and
- *Housing and Productivity Contributions*.

It is requested that Gow Street road pavement upgrade be undertaken as a WIK agreement with Council and that this be negotiated during the assessment process.

6.2 CUMULATIVE ASSESSMENT

The relevant future projects within proximity of the Subject Site are located approximately 500m to the west and are separated by Fairford Road and substantial industrial development. As such, the following cumulative assessment is based on existing environment with the proposed development impacts considered, where relevant.

6.2.1 Cumulative Visual Analysis

The Subject Site has been assessed based on the character and context in which it is currently located. It has been concluded that the significance of the impact upon the landscape from the proposed development is acceptable. This is in part due to the character of the surrounding development, existing and proposed landscaping and design and articulation of the proposed development.

6.2.2 Cumulative Traffic Analysis

Additional traffic from the proposed development, as assessed in **Section 6.1.3** of this EIS, has been assigned to the surrounding road network. The road network will be able to cater for the traffic from the proposed development, without significant impacts.

6.2.3 Cumulative Noise and Vibration Analysis

Subject to the mitigation measures detailed in **Part E** of this EIS, it is considered that the proposed development will not result in any unreasonable noise impacts at the relevant surrounding receivers.

6.2.4 Cumulative Air Quality Analysis

Nine (9) facilities within a 3km radius of the Subject Stie were found to be of a similar emissions profile that may potentially result in cumulative impacts at nearby sensitive receptor locations. Publicly available air quality assessment documents could not be found for the other facilities as such, a quantitative assessment of potential cumulative impacts with the proposed development at surrounding land uses cannot be performed. In any case, and as previously noted, the Approved Methods requires the assessment of incremental impacts associated with individual toxic and odorous air pollutants. Given the discussion provided above, cumulative impacts have been considered within the adoption of the background air quality monitoring data.

A qualitative assessment of the operational phase was carried out and it was concluded that the impacts of the proposed operation, at key industrial/commercial receivers, are likely not to be significant. With the proposal only involving industrial and warehousing activities, the operations are not considered to contribute to the cumulative emissions for the area.

6.2.5 Cumulative Hazard Analysis

The Subject Site is surrounded by light industrial and commercial development. The developments within 200m of Depot 1 or Depots 19 & 20 and show a wide range of uses, all of which, individually and cumulatively, have negligible impact on the sensitive installations of DGs at the Subject Site.

6.3 PLANNED MANAGEMENT AND MITIGATION MEASURES

Selleys (Dulux Group Australia Pty Limited) plan to undertake the construction and operation of the proposed manufacturing facilitate and associated warehouse and distribution centre, in accordance with the planned management and mitigation measures outlined within **Appendix E** of this EIS.

PART 7 JUSTIFICATION OF THE PROJECT

7.1 JUSTIFICATION

The proposed development is justified on environmental, social and economic grounds and is compatible with the locality in which it is proposed. The proposed development would enhance the ageing infrastructure which is no longer fit for purpose on the Subject Site and secure the long term operations whilst allow for continued growth into the future.

This EIS is submitted on the following basis.

7.1.1 Supports State, Regional and Local Planning Objectives

The proposed development is consistent with the objectives, provisions and vision contained within *A Metropolis of Three Cities – Greater Sydney Region Plan* the *South District Plan* and CBLEP2023. The proposal would contribute to employment generation in an area already earmarked for employment through both State and Regional planning policies.

7.1.2 Demonstrates an Appropriate Use of a Permissible Development

The proposed development would retain and contribute to the growth of new industry for the immediate locale and the wider region. The proposed development would be a highly appropriate and compatible (given its contiguousness to other existing warehousing and industrial developments) response to the strategic goals and objectives of the whole region as set out in *A Metropolis of Three Cities – Greater Sydney Region Plan* and the *South District Plan*, which all envisage employment-generating land uses at this location.

7.1.3 Minimises Environmental Impacts

Specialist consultants have assessed the potential impacts of the proposed development, determining that it could be undertaken with minimal environmental impacts. The commissioned reports have collectively concluded that no significant risk to the locality would result from the proposed development. Where impacts have been identified, these fully-developed strategies are set out in detail for management and mitigation. These measures are described in **PART 6** of this EIS.

7.1.4 Creates Compatibility with Surrounding Development

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

7.1.5 Delivers Ecologically Sustainable Development

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

7.1.5.1 Precautionary Principle

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

7.1.5.2 Inter-generational Equity

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

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

7.1.5.3 Environmental Management

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

APPENDIX A
SEARS TABLE

HOW THE SEARS HAVE BEEN SATISFIED	
Issue and Assessment Requirements	**Satisfied by**
1. Statutory and Strategic Context	
▪ Justification for the proposal and the suitability of the site	Refer to **Section 2.7** of this EIS.
▪ Detailed justification that the proposed land use is permissible with consent	Refer to **Appendix C** of this EIS.
▪ A detailed description of the history of the site, including the relationship between the proposed development and all development consents and approved plans previously and/or currently applicable to the site	Refer to **Section 2.2** of this EIS.
▪ Demonstration that the proposal is consistent with all relevant planning strategies, environmental planning instruments, adopted precinct plans, draft district plan(s) and adopted management plans and justification for any inconsistencies. This includes, but is not limited to: o State Environmental Planning Policy (Biodiversity and Conservation) 2021 o State Environmental Planning Policy (Industry and Employment) 2021 o State Environmental Planning Policy (Planning Systems) 2021 o State Environmental Planning Policy (Resilience and Hazards) 2021 o State Environmental Planning Policy (Sustainable Buildings) 2022 o State Environmental Planning Policy (Transport and Infrastructure) 2021 o Canterbury-Bankstown Local Environment Plan 2023 o Greater Sydney Region Plan: A Metropolis of Three Cities o Our Greater Sydney 2056: Central City District Plan o Future Transport Strategy 2056.	Refer to **Section 2.6**, **PART 4** and **Appendix C** of this EIS.
2. Community and Stakeholder Engagement	
▪ Community and stakeholder engagement strategy consistent with the Department's *Undertaking Engagement Guidelines for State Significant Projects* for all stages of the development, including (but not limited to):	Refer to **PART 5**, **Section 6.1.2** and **Appendix 18** of this EIS.
▪ Details of how issues raised, and feedback provided during engagement activities have been considered and responded to in the development	Refer to **PART 5**, **Section 6.1.2** and **Appendix 18** of this EIS.
▪ Details of the proposed approach to future community and stakeholder engagement based on the results of consultation	Refer to **PART 5**, **Section 6.1.2** and **Appendix 18** of this EIS.
3. Traffic and Transport	
▪ A quantitative traffic impact assessment prepared in accordance with relevant Transport for NSW and Austroads guidelines, that includes:	Refer to **Section 6.1.3** and **Appendix 42** of this EIS.
▪ Details of daily and peak traffic volumes likely to be generated during construction and operation, (including consideration of the existing onsite operational traffic that are not part of the proposal	Refer to **Section 6.1.3** and **Appendix 42** of this EIS.
▪ Details of key access / haul routes, vehicle types and any potential queuing impacts	Refer to **Section 6.1.3** and **Appendix 42** of this EIS.

▪ An assessment of the predicted impacts of development traffic on road safety and the capacity of the road network, including consideration of cumulative traffic impacts on existing performance levels of nearby intersections (particularly the intersection of Canterbury Road and Gow Street) using a calibrated SIDRA (or similar) traffic model	Refer to **Section 6.1.3** and **Appendix 42** of this EIS.
▪ Plans demonstrating how all vehicles likely to be generated during construction and operation and awaiting loading, unloading or servicing can be accommodated on the site to avoid queuing in the street network	Refer to **Section 6.1.3** and **Appendix 42** of this EIS.
▪ Details and plans of the proposed internal road network, loading docks, pedestrian and cycling facilities and on-site parking in accordance with the relevant Australian Standards	Refer to **Section 6.1.3** and **Appendix 42** of this EIS.
▪ Details of the largest vehicle anticipated to access and move within the site, including swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site and at key intersections	Refer to **Section 6.1.3** and **Appendix 42** of this EIS.
▪ Details of road upgrades, infrastructure works or new roads or access points required for the development if necessary.	Refer to **Section 6.1.3** and **Appendix 42** of this EIS.
▪ Details of any Traffic Management Plan required to manage construction and operational traffic.	Refer to **Section 6.1.3** and **Appendix 42** of this EIS.
4. Noise and Vibration	
▪ A quantitative noise and vibration impact assessment undertaken by a suitably qualified acoustic consultant in accordance with the relevant Environment Protection Authority guidelines and Australian Standards which includes:	Refer to **Section 6.1.4** and **Appendix 30** of this EIS.
▪ The identification of impacts associated with construction, site emission and traffic generation from the proposal at noise affected sensitive receivers, including the provision of operational noise contours and a detailed sleep disturbance assessment	Refer to **Section 6.1.4** and **Appendix 30** of this EIS.
▪ Details of background noise monitoring survey undertaken in accordance with Fact Sheet A1 of the Noise Policy for Industry (excluding operational noise from the existing development)	Refer to **Section 6.1.4** and **Appendix 30** of this EIS.
▪ Details of noise source inventory for the development and 'worst case' noise emission scenarios	Refer to **Section 6.1.4** and **Appendix 30** of this EIS.
▪ Consideration of annoying characteristics of noise and prevailing meteorological conditions in the study area	Refer to **Section 6.1.4** and **Appendix 30** of this EIS.
▪ Assessment of operational noise against project amenity noise levels derived in accordance with Section 2.4.2 of the Noise Policy for Industry for the redevelopment of an existing cluster of industry	Refer to **Section 6.1.4** and **Appendix 30** of this EIS.
▪ Details and analysis of the effectiveness of proposed management and mitigation measures to adequately manage identified impacts from the proposed works, including a clear identification of residual noise and vibration following application of mitigation these	Refer to **Section 6.1.4** and **Appendix 30** of this EIS.

measures and details of any proposed compliance monitoring programs.	
5. Air Quality and Odour	
▪ An assessment of the potential air quality, dust and odour impacts of the development (construction and operation) on surrounding landowners, businesses and sensitive receptors, in accordance with relevant Environment Protection Authority guidelines, including details of proposed mitigation, management and monitoring measures	Refer to **Section 6.1.5** and **Appendix 5** of this EIS.
6. Water Management	
▪ An integrated water management strategy, including:	Refer to **Section 6.1.6** and **Appendices 12** and **13** of this EIS.
▪ A detailed site water balance including a description of the water demands and breakdown of water supplies, measures to minimise water use and any water licensing requirements	Refer to **Section 6.1.6** and **Appendices 12** and **13** of this EIS
▪ A description of groundwater and surface water conditions and all works/activities that may intercept, extract, use, divert or receive surface water and/or groundwater (both temporary and permanent)	Refer to **Section 6.1.6** and **Appendices 12** and **13** of this EIS
▪ An assessment of potential surface and groundwater impacts (both quality and quantity) associated with the development, including potential impacts on watercourses, riparian areas, groundwater, and groundwater-dependent communities nearby in accordance with relevant water quality guidelines and the Department of Climate Change, Energy, the Environment and Water - Water Group (DCCEEW-Water) Groundwater Toolkit	Refer to **Section 6.1.6** and **Appendices 12** and **13** of this EIS
▪ Details of how the proposed stormwater and wastewater drainage design integrates with existing on-site systems, including details of the capacity of onsite detention system(s), onsite sewage management and measures to treat, reuse or dispose of water	Refer to **Section 6.1.6** and **Appendices 12** and **13** of this EIS
▪ A surface water discharge assessment in accordance with relevant EPA guidelines, including an assessment of potential impacts on watercourses and riparian areas, and characterisation of water quality at the point of discharge against the relevant water quality criteria	Refer to **Section 6.1.6** and **Appendices 12** and **13** of this EIS
▪ Details of any surface or groundwater mitigation, management and monitoring activities and methodologies	Refer to **Section 6.1.6** and **Appendices 12** and **13** of this EIS
7. Flooding	
▪ A flood impact risk assessment (FIRA) prepared in accordance with the *Flood risk management guideline LU01 - Flood impact and risk assessment (2023)*. The FIRA must:	Refer to **Section 6.1.7** and **Appendix 22** and **23** of this EIS.
▪ Identify the flood planning level and any flood risk on-site (mainstream and overland) having regard to adopted (available and recent) flood studies, the potential effects of	Refer to **Section 6.1.7** and **Appendix 22** and **23** of this EIS.

climate change, and any relevant provisions of the NSW Flood Risk Management Manual (2023)	
▪ Assess the impacts of the development, including any changes to flood risk on-site or off-site, and detail design solutions and operational procedures to mitigate flood risk where required	Refer to **Section 6.1.7** and **Appendix 22** and **23** of this EIS.
▪ Identify flood behaviour, flood constraints and risks on the site and adjoining areas including the potential impacts of climate change for the full range of events up to and including the probable maximum flood (PMF) event	Refer to **Section 6.1.7** and **Appendix 22** and **23** of this EIS.
▪ Include details of proposed management measures to minimise the impacts of flooding on the development and flood risk to the community	Refer to **Section 6.1.7** and **Appendix 22** and **23** of this EIS.
▪ Detail, where required, an emergency management and response strategy for local catchment (and/or overland) and mainstream flooding, which:	Refer to **Section 6.1.7** and **Appendix 22** and **23** of this EIS.
o Identifies potential options for emergency management and response, including safe evacuation from the site and/or shelter-in-place, based on adopted flood studies and flood warnings from the Bureau of Meteorology (where available)	Refer to **Section 6.1.7** and **Appendix 22** and **23** of this EIS.
o Evaluates the performance of safe evacuation from the site, including consideration of possible constraints of existing road networks, potential interruptions of traffic flows, and the lead time for evacuation from existing flood warning services	Refer to **Section 6.1.7** and **Appendix 22** and **23** of this EIS.
o Identifies the primary emergency management and response approach under significant events, up to and including the PMF event.	Refer to **Section 6.1.7** and **Appendix 22** and **23** of this EIS.
8. Contamination	
▪ A site contamination assessment in accordance with the Managing Land Contamination Planning Guidelines: SEPP 55 – Remediation of Land (DUAP, 1998), including:	Refer to **Section 6.1.8** and **Appendix 33** and **36** of this EIS.
▪ Characterisation of the nature and extent of any contamination on the site and surrounding area	Refer to **Section 6.1.8** and **Appendix 33** and **36** of this EIS.
▪ A Detailed Site Investigation (DSI) and a Remedial Action Plan, if the Preliminary Site Investigation indicates contamination is present and a DSI is required.	Refer to **Section 6.1.8** and **Appendix 33** and **36** of this EIS.
9. Soils	
▪ An assessment of potential impacts on soil resources and riparian areas on and near the site, including:	Refer to **Section 6.1.9** and **Appendices 12**, **13**, **24**, **37** and **38** of this EIS.
▪ Impacts on soil erosion, salinity and acid sulfate soils	Refer to **Section 6.1.9** and **Appendices 12**, **13**, **24**, **37** and **38** of this EIS.
▪ Details of earthworks, including cut and fill volumes	Refer to **Section 6.1.9** and **Appendices 12**, **13**, **24**, **37** and **38** of this EIS.
▪ Description of the proposed erosion and sediment controls during construction	Refer to **Section 6.1.9** and **Appendices 12**, **13**, **24**, **37** and **38** of this EIS.
10. Hazard and Risk	
▪ A preliminary risk screening completed in accordance with State Environmental Planning Policy (Resilience and	Refer to **Section 6.1.10** and **Appendix 35** of this EIS.

Hazards) 2021 and Applying SEPP 33 (dop, 2011), that includes	
○ A clear indication of class, storage and handling quantities and location of all dangerous goods and hazardous materials within the entire site (new development and existing operations)	Refer to **Section 6.1.10** and **Appendix 35** of this EIS.
○ A Preliminary Hazard Analysis (PHA) prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis (dop, 2011) and Multi-Level Risk Assessment (dop, 2011), should the preliminary risk screening indicate that the project is "potentially hazardous"	Refer to **Section 6.1.10** and **Appendix 35** of this EIS.
○ Given the proximity of Salt Pan Creek, consideration of the effects of a contaminated water release on the environment should be included in the PHA.	Refer to **Section 6.1.10** and **Appendix 35** of this EIS.
11. Fire and Emergency Services	
▪ Including plans and details of proposed operational access for emergency services personnel in accordance with the *Fire and Rescue NSW fire safety guideline - Access for fire brigade vehicles and firefighters* (V05.01 dated November 2020).	Refer to **Section 6.1.11** and **Appendix 21** of this EIS.
12. Visual	
▪ A visual impact assessment (including photomontages and perspectives) of the development layout and design (buildings and storage areas), including:	Refer to **Section 6.1.12** and **Appendices 29** and **43** of this EIS
▪ Details of staging, site coverage, setbacks, open space, landscaping, height, colour, scale, building materials and finishes, façade design, signage and lighting, particularly in terms of potential impacts on:	Refer to **Section 6.1.12** and **Appendices 29** and **43** of this EIS
○ Nearby public and private receivers	Refer to **Section 6.1.12** and **Appendices 29** and **43** of this EIS
○ Significant vantage points in the broader public domain	Refer to **Section 6.1.12** and **Appendices 29** and **43** of this EIS
▪ Consideration of the layout and design of the development having regard to the surrounding vehicular, pedestrian and cycling networks	Refer to **Section 6.1.12** and **Appendices 29** and **43** of this EIS
▪ Detailed plans showing suitable landscaping which incorporates endemic species.	Refer to **Section 6.1.12** and **Appendices 29** and **43** of this EIS.
13. Waste Management	
▪ A waste management report that includes:	Refer to **Section 6.1.13** and **Appendices 14** and **31** of this EIS.
▪ Details of the quantities and classification of all waste streams to be generated on site during the development	Refer to **Section 6.1.13** and **Appendices 14** and **31** of this EIS
▪ Details of waste storage, handling and disposal during the development	Refer to **Section 6.1.13** and **Appendices 14** and **31** of this EIS
▪ Details of the measures that would be implemented to ensure that the development is consistent with the aims, objectives and guidance in the NSW Waste and Sustainable Materials Strategy 2041.	Refer to **Section 6.1.13** and **Appendices 14** and **31** of this EIS
14. Infrastructure Requirements	

▪ An infrastructure delivery, management and staging plan that includes:	Refer to **Section 6.1.14** and **Appendices 26** and **28** of this EIS.
▪ An assessment of impacts on existing utility infrastructure	Refer to **Section 6.1.14** and **Appendices 26** and **28** of this EIS
▪ Details of any extension or augmentation of utilities required to service the development and details of how required upgrades would be delivered and funded, including arrangements for electrical network requirements, drinking water, wastewater and recycled water	Refer to **Section 6.1.14** and **Appendices 26** and **28** of this EIS
▪ Identification of any existing infrastructure or easements on or off the site which may be impacted by construction or operation of the development and details of measures to be implemented to address any impacts.	Refer to **Section 6.1.14** and **Appendices 26** and **28** of this EIS
15. Aboriginal Cultural Heritage	
▪ Unless otherwise agreed to in writing by Heritage NSW, an Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared in accordance with the Code of Practice for Archaeological Investigation in NSW (DECCW 2010), and guided by the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales (OEH 2011). The ACHAR must:	Refer to **Section 6.1.15** and **Appendices 2** and **7** of this EIS.
▪ Identify, describe and assess impacts on the Aboriginal cultural heritage values that exist across the development site	Refer to **Section 6.1.15** and **Appendices 2** and **7** of this EIS.
▪ Provide evidence and details of consultation with Aboriginal people in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010)	Refer to **Section 6.1.15** and **Appendices 2** and **7** of this EIS.
▪ Include results of a surface survey and any test excavations and an unexpected finds protocol.	Refer to **Section 6.1.15** and **Appendices 2** and **7** of this EIS.
16. Non-Aboriginal Cultural Heritage	
▪ A non-Aboriginal cultural heritage assessment (including both cultural and archaeological significance) which must detail potential impacts on heritage assets and any proposed management and mitigation measures	Refer to **Section 6.1.16** and **Appendix 25** of this EIS.
17. Biodiversity	
▪ An assessment of the proposal's biodiversity impacts in accordance with the Biodiversity Conservation Act 2016, including the preparation of a Biodiversity Development Assessment Report (BDAR) where required	Refer to **Section 6.1.17** and **Appendix 10** of this EIS.
18. Social	
▪ A social impact assessment in accordance with the Department's Social Impact Assessment Guideline	Refer to **Section 6.1.18** and **Appendix 40** of this EIS.
19. Ecologically Sustainable Development	
▪ Identification of how ESD principles (as defined in section 193 of the EP&A Regulation) are incorporated in the design and ongoing operation of the development	Refer to **Section 6.1.19** and **Appendix 19** of this EIS.

▪ Demonstration of how the development will meet or exceed the relevant industry recognised building sustainability and environmental performance standards	Refer to **Section 6.1.19** and **Appendix 19** of this EIS.
▪ Demonstration of how the development minimises greenhouse gas emissions (reflecting the Government's goal of net zero emissions by 2050) and consumption of energy, water (including water sensitive urban design) and material resources	Refer to **Section 6.1.19** and **Appendix 19** of this EIS.
▪ If Chapter 3 of State Environmental Planning Policy (Sustainable Buildings) 2022 applies:	Refer to **Section 6.1.19** and **Appendix 19** of this EIS.
○ Demonstrate how the development has been designed to address the provisions set out in in Chapter 3.2(1)	Refer to **Section 6.1.19** and **Appendix 19** of this EIS.
○ Provide a NABERS Embodied Emissions Material Form to disclose the amount of embodied emissions attributable to the development in accordance with section 35BA of the EP&A Regulation.	Refer to **Section 6.1.19** and **Appendix 19** of this EIS.
20. Planning Agreement/Development Contributions	
▪ Including consideration of any applicable State and local development contributions, such as the Housing and Productivity Contribution and/or draft contributions plan(s), and/or details of any Voluntary Planning Agreement required should a contributions plan not be in place	Refer to **Section 6.1.20** of this EIS.

APPENDIX B
DETAILED PLANS

SSD-71052213

REGISTER OF PROJECT MAPS/PLANS			
Drawing	**Title**	**Revision**	**Date**
Civil Drawings			
CO14984.00-SSDA100	Drawing List & General Notes	C	28/10/24
CO14984.00-SSDA200	Erosion And Sediment Control Key Plan	C	28/10/24
CO14984.00-SSDA251	Erosion And Sediment Control Details – Sheet 1	A	06/09/24
CO14984.00-SSDA252	Erosion And Sediment Control Details – Sheet 2	A	06/09/24
CO14984.00-SSDA300	Bulk Earthworks Plan	B	28/10/24
CO14984.00-SSDA301	Cut & Fill Plan	A	06/09/24
CO14984.00-SSDA350	Bulk Earthworks Sections	A	19/09/24
CO14984.00-SSDA400	Stormwater Drainage Key Plan	E	28/10/24
CO14984.00-SSDA410	Pre/Post Development Catchment Plan	B	28/10/24
CO14984.00-SSDA451	Stormwater Drainage Details – Sheet 1	A	06/09/24
CO14984.00-SSDA452	Stormwater Drainage Details – Sheet 2	A	06/09/24
CO14984.00-SSDA500	Finished Levels Key Plan	B	28/10/24
CO14984.00-F100	Drawing List & Locality Plan	B	28/10/24
CO14984.00-F110	RAFTS Model Catchment Plan	B	28/10/24
CO14984.00-F120	TUFLOW Model Configuration Plan	B	28/10/24
CO14984.00-F200	20% AEP Pre-Development Flood Levels & Depth Plan	B	28/10/24
CO14984.00-F201	20% AEP Pre-Development Flood Velocity Plan	B	28/10/24
CO14984.00-F202	20% AEP Pre-Development Flood Hazard Plan	B	28/10/24
CO14984.00-F210	5% AEP Pre-Development Flood Levels & Depth Plan	B	28/10/24
CO14984.00-F211	5% AEP Pre-Development Flood Velocity Plan	B	28/10/24
CO14984.00-F212	5% AEP Pre-Development Flood Hazard Plan	B	28/10/24
CO14984.00-F220	1% AEP Pre-Development Flood Levels & Depth Plan	B	28/10/24
CO14984.00-F221	1% AEP Pre-Development Flood Velocity Plan	B	28/10/24
CO14984.00-F222	1% AEP Pre-Development Flood Hazard Plan	B	28/10/24
CO14984.00-F230	0.5% AEP Pre-Development Flood Levels & Depth Plan	B	28/10/24
CO14984.00-F231	0.5% AEP Pre-Development Flood Velocity Plan	B	28/10/24
CO14984.00-F232	0.5% AEP Pre-Development Flood Hazard Plan	B	28/10/24
CO14984.00-F240	0.2% AEP Pre-Development Flood Levels & Depth Plan	B	28/10/24
CO14984.00-F241	0.2% AEP Pre-Development Flood Velocity Plan	B	28/10/24
CO14984.00-F242	0.2% AEP Pre-Development Flood Hazard Plan	B	28/10/24
CO14984.00-F250	PMF Pre-Development Flood Levels & Depth Plan	B	28/10/24
CO14984.00-F251	PMF AEP Pre-Development Flood Velocity Plan	B	28/10/24
CO14984.00-F252	PMF AEP Pre-Development Flood Hazard Plan	B	28/10/24
Landscaping Drawings			
SSD-00	Landscape Cover Sheet	F	22/10/24
SSD-01	Landscape Master Plan	F	22/10/24
SSD-02	Landscape Detail Plans	F	22/10/24
SSD-03	Landscape Section AA & BB	F	22/10/24
SSD-04	Specification & Details	F	22/10/24

SSD-05	Planting Schedule Imagery	F	22/10/24
Architectural Drawings			
TP00	Cover Sheet	-	-
TP01	Site Locality Plan	A	31/10/24
TP02	Existing Survey	A	31/10/24
TP03	Site Analysis	A	31/10/24
TP04	Demolition Plan	B	31/10/24
TP05	Site Plan	A	31/10/24
TP100	Existing Warehouse Proposed Ground Floor	A	31/10/24
TP101	Existing Warehouse Proposed Mezzanine	A	31/10/24
TP102	Proposed Production & Warehouse Ground Floor	A	31/10/24
TP103	OTC Ground Floor	A	31/10/24
TP104	OTC First Floor & Second Floor	A	31/10/24
TP105	New Yard	B	31/10/24
TP106	Roof Plans	B	31/10/24
TP200	Overall Master Elevations	B	31/10/24
TP201	Existing Warehouse Proposed Elevations	B	31/10/24
TP203	Proposed Production & Warehouse Elevations	B	31/10/24
TP204	OTC Elevations	B	31/10/24
TP205	Bunded Plant Views	B	31/10/24
TP300	Overall Master Sections	A	31/10/24
TP301	Existing Warehouse Proposed Sections	B	31/10/24
TP302	Proposed Production & Warehouse Sections	A	31/10/24
TP303	OTC Sections	B	31/10/24
TP500	Shadow Diagrams	A	31/10/24
TP501	External Finishes	B	31/10/24

APPENDIX C
STATUTORY COMPLIANCE TABLE

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

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory Document	**Section Reference**	**Mandatory Consideration**	**Relevance**	**Section in the EIS**
			▪ It provides a genuine and obvious development of existing industrial land, further reinforcing the notion of orderly development, within an area already designated for such purposes; ▪ It includes increased provisions for landscaping, helping to revitalise and naturally landscape a substantial canopy cover across the Subject Site, further minimising the potential impacts of the Urban Heat Island Effect; and ▪ It improves water-quality for stormwater in accordance with the requirements of Council's engineering guidelines.	
		(d) to promote the delivery and maintenance of affordable housing,	Not applicable – this objective is not applicable to the proposed development, as the proposal does not seek consent for housing.	**N/A**
		(e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,	The proposed development has been designed and will be managed to ensure that it would not result in any adverse impacts to threatened and other species of native animals and plants, ecological communities and their habitats.	Refer to **Section 6.1.17** of the EIS.
		(f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),	The proposed development has been designed and will be managed to promote the sustainable management of built and cultural heritage.	Refer to **Section 6.1.15** and **6.1.16** of the EIS.
		(g) to promote good design and amenity of the built environment,	The proposed development has been designed to achieve a high quality architectural response which is of a consistent form and scale with the surrounding industrial development and meet the operational demands of the proposed development.	Refer to **Section 3.3.2.2** of the EIS.

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory Document	**Section Reference**	**Mandatory Consideration**	**Relevance**	**Section in the EIS**
			The proposed design responds to the setting of the area by providing a high-quality industrial facility which is proposed as an upgrade to the existing site, improving the overall look of Gow Street with a carefully articulated building facade, that respects the existing office buildings giving a more human scale to the street whilst at the same time considering access and the visual and acoustic impacts on the nearby properties. The street façade maintains the existing two-storey office buildings to address the bulk and scale of the new industrial building that will provide a high quality façade as the background. The main façade on Gow Street will be improved with the demolition of an old existing canteen building to be replaced with a new truck exit and a new landscape area and fencing.	
		(h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,	The proposed development would be implemented through best-industry practice standards and measures. The proposal has been designed in accordance with the NCC. This incorporates into the design, all statutory and functional requirements, regarding access, egress and fire, which are deemed necessary to safeguard the safety of building occupants and the longevity of the development.	**N/A**
		(i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,	This proposal is SSD, which devolves the environmental planning and assessment of the application to NSW DPHI. Notwithstanding, the proposal has also been informed by engagement with Council.	**N/A**

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory Document	**Section Reference**	**Mandatory Consideration**	**Relevance**	**Section in the EIS**
		(j) to provide increased opportunity for community participation in environmental planning and assessment.	Community and stakeholder engagement has been undertaken for the proposed development. This has included meetings and notification letters to both agencies and all potentially impacted stakeholders.	Refer to **Part 5** and **Section 6.1.2** of the EIS.
	Section 4.15(1)(a) – Matters for consideration—general	*(i) any relevant environmental planning instrument, and*	EPIs relevant to the proposal include ▪ *Commonwealth Environment Protection and Biodiversity Conservation Act 1999* ▪ *Environmental Planning and Assessment Act 1979* ▪ *Environmental Planning and Assessment Regulation 2021* ▪ *Water Management Act 2000* ▪ *Biodiversity Conservation Act 2016* ▪ *Heritage Act 1977* ▪ *National Parks and Wildlife Act 1974* ▪ *Rural Fires Act 1997* ▪ *Protection of the Environment Operations Act 1997* ▪ *State Environmental Planning Policy (Resilience and Hazards) 2021* ▪ *State Environmental Planning Policy (Transport and Infrastructure) 2021* ▪ *State Environmental Planning Policy (Planning Systems) 2021* ▪ *State Environmental Planning Policy (Biodiversity and Conservation) 2021* ▪ *State Environmental Planning Policy (Sustainable Buildings) 2022* ▪ *Canterbury-Bankstown Local Environmental Plan 2023*	Refer below.

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory Document	**Section Reference**	**Mandatory Consideration**	**Relevance**	**Section in the EIS**
		(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and	There are no draft EPIs relevant to the proposed development.	N/A
		(iii) any development control plan, and	Despite the relevance of Clause 2.2 of the *State Environmental Planning Policy (Planning Systems) 2021*, the *Canterbury-Bankstown Development Control Plan 2023* has been considered and assessed.	Refer to **Appendix 11** of this EIS.
		(iiia) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and	It is requested that Gow Street road pavement upgrade be undertaken as a WIK agreement with Council and that this be negotiated during the assessment process.	Refer to **Section 6.1.20** of the EIS.
		(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph),	-	Refer below.
	Section 4.15(1)(b) – Matters for consideration—general	*the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,*	-	Refer to **PART 6** of this EIS.
	Section 4.15(1)(c) – Matters for consideration—general	*the suitability of the site for the development,*	-	Refer to **Section 2.6** of this EIS.
	Section 4.15(1)(d) – Matters for consideration—general	*any submissions made in accordance with this Act or the regulations*	Part of the forthcoming exhibition and response to submissions phases	N/A

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory Document	**Section Reference**	**Mandatory Consideration**	**Relevance**	**Section in the EIS**
	Section 4.15(1)(e) – Matters for consideration—general	*the public interest*	-	Refer to **Section 6.1.18** of this EIS.
	Section 4.46 – What is "integrated development".	*Integrated development is development (not being State significant development or complying development) that, in order for it to be carried out, requires development consent and one or more of the following approvals*	The proposed development is a schedule activity subject to the POEO Act and is therefore integrated development.	Refer below.
Environmental Planning and Assessment Regulation 2021	Clause 190 – Form of environmental impact statement	*(1) An environmental impact statement must contain the following information—* *(a) the name, address and professional qualifications of the person who prepared the statement,* *(b) the name and address of the responsible person,* *(c) the address of the land—* *(i) to which the development application relates, or* *(ii) on which the activity or infrastructure to which the statement relates will be carried out,* *(d) a description of the development, activity or infrastructure,* *(e) an assessment by the person who prepared the statement of the environmental impact of the development, activity or infrastructure, dealing with the matters referred to in this Division.*	**-**	Refer to **WHOLE EIS.**
		(2) The person preparing the statement must have regard to—	-	Refer to **WHOLE EIS.**

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory Document	**Section Reference**	**Mandatory Consideration**	**Relevance**	**Section in the EIS**
		(a) for State significant development—the State Significant Development Guidelines, or *(b) for State significant infrastructure—the State Significant Infrastructure Guidelines.*		
		(3) An environmental impact statement must also contain a declaration by a relevant person that— *(a) the statement has been prepared in accordance with this Regulation, and* *(b) the statement contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure, and* *(c) the information contained in the statement is not false or misleading, and* *(d) for State significant development or State significant infrastructure—the statement contains the information required under the Registered Environmental Assessment Practitioner Guidelines.*	-	Refer to **EIS DECLERATION** on **page ii** of this EIS.
	Clause 191 – Compliance with environmental assessment requirements	*The environmental impact statement must comply with the environmental assessment requirements notified under section 176 or the Act, section 5.16(4).*	The SEARs (reference: SSD-71052213), issued by the NSW DPE on 18 June 2024, identify the following Key Issues: 1. Statutory and Strategic Context 2. Community and Stakeholder Engagement 3. Traffic and Transport 4. Noise and Vibration 5. Air Quality and Odour	Refer to **PART 6** of this EIS.

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory Document	**Section Reference**	**Mandatory Consideration**	**Relevance**	**Section in the EIS**
			6. Water Management 7. Flooding 8. Contamination 9. Soils 10. Hazard and Risk 11. Fire and Emergency Services 12. Visual 13. Waste Management 14. Infrastructure Requirements 15. Aboriginal Cultural Heritage 16. Non-Aboriginal Cultural Heritage 17. Biodiversity 18. Social 19. Ecologically Sustainable Development 20. Planning Agreements/Development Contributions	
	Part 1, Clause 3 – Designated Development	*(1) Development described in Schedule 3, Part 2 is declared to be designated development unless it is not designated development under Schedule 3, Part 3.*	The proposal triggers 'Designated Development' pursuant Schedule 3, Clauses 12 and 13 of the EP&A Regulation as the proposed development is located within 100m of a wetland.	-
Considerations under EPIs				
State Environmental Planning Policy (Resilience and Hazards) 2021	Clause 2.8 – Development on land in proximity to coastal wetlands or littoral rainforest	*(1) Development consent must not be granted to development on land identified as "proximity area for coastal wetlands" or "proximity area for littoral rainforest" on the Coastal Wetlands and Littoral Rainforests Area Map unless the consent authority is satisfied that the proposed development will not significantly impact on—* *(a) the biophysical, hydrological or ecological integrity of the adjacent coastal wetland or lit ral rainforest, or*	The proposed development does not result in impacts to the adjacent coastal wetland.	Refer to **Section 6.1.6** and **6.1.17**of this EIS

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory Document	**Section Reference**	**Mandatory Consideration**	**Relevance**	**Section in the EIS**
		(b) the quantity and quality of surface and ground water flows to and from the adjacent coastal wetland or littoral rainforest.		
	Clause 3.12 – Matters for consideration by consent authorities	*In determining an application to carry out development to which this Part applies, the consent authority must consider (in addition to any other matters specified in the Act or in an environmental planning instrument applying to the development)—* *(a) current circulars or guidelines published by the Department of Planning relating to hazardous or offensive development, and* *(b) whether any public authority should be consulted concerning any environmental and land use safety requirements with which the development should comply, and* *(c) in the case of development for the purpose of a potentially hazardous industry—a preliminary hazard analysis prepared by or on behalf of the applicant, and* *(d) any feasible alternatives to the carrying out of the development and the reasons for choosing the development the subject of the application (including any feasible alternatives for the location of the development and the reasons for choosing the location the subject of the application), and*	A Preliminary Hazard Analysis of the proposed development has identified the development as potentially hazardous.	Refer to **Section 6.1.10** of this EIS

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory Document	**Section Reference**	**Mandatory Consideration**	**Relevance**	**Section in the EIS**
		(e) any likely future use of the land surrounding the development.		
	Clause 4.6 – Contamination and remediation to be considered in determining development application	*(1) A consent authority must not consent to the carrying out of any development on land unless—* *(f) it has considered whether the land is contaminated, and* *(g) if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and* *(h) if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.*	Detailed site investigations of the Subject Site have identified that the Subject Site may be made suitable for the proposed development having regard to contamination.	Refer to **Section 6.1.8** of this EIS.
State Environmental Planning Policy (Transport and Infrastructure) 2021	Clause 2.122 – Traffic generating development	*(1) This section applies to development specified in Column 1 of the Table to Schedule 3 that involves—* *(a) new premises of the relevant size or capacity, or* *(b) an enlargement or extension of existing premises, being an alteration or addition of the relevant size or capacity.* *[…]*	The proposal involves an industry with a site area which exceeds 5,000m^2 within 90m of a classified road which constitutes traffic-generating development, as described in Schedule 3 of the Transport and Infrastructure SEPP.	-

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory Document	**Section Reference**	**Mandatory Consideration**	**Relevance**	**Section in the EIS**
		(2) Before determining a development application for development to which this section applies, the consent authority must— *(a) give written notice of the application to TfNSW within 7 days after the application is made, and* *(b) take into consideration—* *(i) any submission that RMS provides in response to that notice within 21 days after the notice was given (unless, before the 21 days have passed, TfNSW advises that it will not be making a submission), and* *(ii) the accessibility of the site concerned, including—* *(a) the efficiency of movement of people and freight to and from the site and the extent of multi-purpose trips, and* *(b) the potential to minimise the need for travel by car and to maximise movement of freight in containers or bulk freight by rail, and* *(c) any potential traffic safety, road congestion or parking implications of the development.*		
State Environmental Planning Policy (Planning Systems) 2021	Part 2.2 – State significant development	*(1) Development is declared to be State significant development for the purposes of the Act if—* *(a) the development on the land concerned is, by the operation of an environmental*	In accordance with Schedule 1 of the Planning Systems SEPP, development that has an EDC of more than $30 million for the purpose of a chemical, manufacturing and related industries, constitutes SSD.	Refer to **Section 1.5** of this EIS.

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory Document	**Section Reference**	**Mandatory Consideration**	**Relevance**	**Section in the EIS**
		planning instrument, not permissible without development consent under Part 4 of the Act, and *(b) the development is specified in Schedule 1 or 2.*	The EDC of the proposed development exceeds $30 million.	
State Environmental Planning Policy (Biodiversity and Conservation) 2021	Clause 2.10 – Council may issue permit for clearing of vegetation	*(2) A permit cannot be granted to clear native vegetation in any non-rural area of the State that exceeds the biodiversity offsets scheme threshold.*	A Biodiversity Development Assessment Report has been provided.	Refer to **Section 6.1.17** of this EIS.

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory Document	**Section Reference**	**Mandatory Consideration**	**Relevance**	**Section in the EIS**
State Environmental Planning Policy (Sustainable Buildings) 2022	Clause 3.2 – Development consent for non-residential development	*(2) In deciding whether to grant development consent to non-residential development, the consent authority must consider whether the development is designed to enable the following—* *(a) the minimisation of waste from associated demolition and construction, including by the choice and reuse of building materials,* *(b) a reduction in peak demand for electricity, including through the use of energy efficient technology,* *(c) a reduction in the reliance on artificial lighting and mechanical heating and cooling through passive design,* *(d) the generation and storage of renewable energy,* *(e) the metering and monitoring of energy consumption,* *(f) the minimisation of the consumption of potable water.* *(g) Development consent must not be granted to non-residential development unless the consent authority is satisfied the embodied emissions attributable to the development have been quantified.*	The proposed development has been designed to consider all relevant measures to maximise the sustainability of the non-residential development and the embodied emissions attributable have been quantified.	Refer to **Section 6.1.19** of this EIS.
Canterbury-Bankstown Local Environmental Plan 2023	Clause 4.1 – Minimum Lot Size	*(3) The size of any lot resulting from a subdivision of land to which this clause applies is not to be less than the minimum size shown on the Lot Size Map in relation to that land.*	The Lot Size Map prescribes a maximum lot size of 1,500m^{2}. No subdivision is proposed.	-
	Clause 4.3 – Height of Buildings	*(1) The height of a building on any land is not to exceed the maximum height shown for the land on the Height of Buildings Map.*	The Height of Building Map does not prescribe a maximum building height.	-

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory Document	**Section Reference**	**Mandatory Consideration**	**Relevance**	**Section in the EIS**
	Clause 4.4 – Floor Space Ratio	*(2) The maximum floor space ratio for a building on any land is not to exceed the floor space ratio shown for the land on the Floor Space Ratio Map.*	The Floor Space Raio Map prescribes a maximum floor space ratio of 1:1 at 15 & 20 Gow Street. A floor space ratio of 0.48:1 is proposed which complies.	
	Clause 5.21 Flood Planning	*(2) Development consent must not be granted to development on land the consent authority considers to be within the flood planning area unless the consent authority is satisfied the development—* *(a) is compatible with the flood function and behaviour on the land, and* *(b) will not adversely affect flood behaviour in a way that results in detrimental increases in the potential flood affectation of other development or properties, and* *(c) will not adversely affect the safe occupation and efficient evacuation of people or exceed the capacity of existing evacuation routes for the surrounding area in the event of a flood, and* *(d) incorporates appropriate measures to manage risk to life in the event of a flood, and* *(e) will not adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses.*	The proposed development will not result in any adverse impacts to the flood function and behaviour or the safe occupation and efficient evacuation of the Subject Site and surrounding land.	Refer to **Section 6.1.7** of this EIS
	Clause 6.1 – Acid Sulfate Soils	*(2) Development consent is required for the carrying out of works described in the table to this subclause on land shown on the Acid*	An Acid Sulfate Management Plan has been prepared and provided.	Refer to **Section 6.1.9** of this EIS

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory Document	**Section Reference**	**Mandatory Consideration**	**Relevance**	**Section in the EIS**
		Sulfate Soils Map as being of the class specified for those works. *Class 2:* *Works below the natural ground surface.* *Works by which the watertable is likely to be lowered.* *(3) Development consent must not be granted under this clause for the carrying out of works unless an acid sulfate soils management plan has been—* *(a) prepared for the proposed works in accordance with the Acid Sulfate Soils Manual, and* *(b) provided to the consent authority.* *(4) Development consent is not required under this clause for the carrying out of works if—* *(a) A preliminary assessment of the proposed works prepared in accordance with the Acid Sulfate Soils Manual indicates that an acid sulfate soils management plan is not required for the works, and* *(b) the preliminary assessment has been provided to the consent authority, and* *(c) the consent authority has confirmed the assessment by notice in writing to the person proposing to carry out the works.*		
	Clause 6.2 – Earthworks	*(2) Development consent is required for earthworks unless—* *(a) the earthworks are exempt development under this plan or another*	The proposed development will not result in any adverse impacts having regard to earthworks or soils.	Refer to **Section 6.1.9** of this EIS

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory Document	**Section Reference**	**Mandatory Consideration**	**Relevance**	**Section in the EIS**
		applicable environmental planning instrument, or *(b) the earthworks are ancillary to—* *(i) development that is permitted without development consent under this plan, or* *(ii) development for which development consent has been granted.* *(3) In deciding whether to grant development consent for earthworks, or for development involving ancillary earthworks, the consent authority must consider the following—* *(a) the likely disruption of, or the detrimental effect on, drainage patterns and soil stability in the locality of the development,* *(b) the effect of the development on the likely future use or redevelopment of the land,* *(c) the quality of the fill and the soil to be excavated,* *(d) the effect of the development on the existing and likely amenity of adjoining properties,* *(e) the source of the fill material and the destination of the excavated material,* *(f) the likelihood of disturbing relics,* *(g) the proximity to, and potential for adverse impacts on, a waterway, drinking water catchment or environmentally sensitive area,* *(h) appropriate measures proposed to avoid, minimise or mitigate the impacts of the development.*		

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory Document	**Section Reference**	**Mandatory Consideration**	**Relevance**	**Section in the EIS**
	Clause 6.4 – Biodiversity	*(3) In deciding whether to grant development consent for development on land to which this clause applies, the consent authority must consider—* *(a) whether the development is likely to have the following—* *(i) an adverse impact on the condition, ecological value and significance of the fauna and flora on the land,* *(ii) an adverse impact on the importance of the vegetation on the land to the habitat and survival of native fauna,* *(iii) the potential to fragment, disturb or diminish the biodiversity structure, function and composition of the land,* *(iv) an adverse impact on the habitat elements providing connectivity on the land,* *(b) appropriate measures to avoid, minimise or mitigate the impacts of the development.* *(4) Development consent must not be granted to development on land to which this clause applies unless the consent authority is satisfied that—* *(a) the development is designed, sited and will be managed to avoid a significant adverse environmental impact, or* *(b) if a significant adverse environmental impact cannot be reasonably avoided by adopting feasible alternatives—the development is designed, sited and will be managed to minimise the impact.*	The proposed development has been designed, sited and will be managed to avoid significant adverse environmental impacts.	Refer to **Section 6.1.17** of this EIS

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory Document	**Section Reference**	**Mandatory Consideration**	**Relevance**	**Section in the EIS**
	Clause 6.9 – Essential Services	*Development consent must not be granted to development unless the consent authority is satisfied that the following services that are essential for the development are available or that adequate arrangements have been made to make them available when required—* *(a) the supply of water,* *(b) the supply of electricity,* *(c) the disposal and management of sewage,* *(d) stormwater drainage or on-site conservation,* *(e) waste management,* *(f) suitable vehicular access.*	The Subject Site is capable of being adequately serviced as required and appropriate arrangements will be made as such.	Refer to **Section 6.1.14** of this EIS
	Clause 6.15 – Design Excellence	*(3) Development consent must not be granted to development to which this clause applies unless the consent authority is satisfied the development exhibits design excellence.* *(4) In deciding whether the development exhibits design excellence, the consent authority must consider the following—* *(a) whether a high standard of architectural design, materials and detailing appropriate to the building type and location will be achieved,* *(b) whether the form and external appearance of the development will improve the quality and amenity of the public domain,* *(c) whether the development detrimentally impacts on view corridors,* *(d) how the development addresses the following matters—*	The proposed development has been designed to achieve a high quality architectural response which is of a consistent form and scale with the surrounding industrial development and meet the operational demands of the proposed development. The proposed design responds to the setting of the area by providing a high-quality industrial facility which is proposed as an upgrade to the existing site, improving the overall look of Gow Street with a carefully articulated building facade, that respects the existing office buildings giving a more human scale to the street whilst at the same time considering access and the visual and acoustic impacts on the nearby properties. The street façade maintains the existing two-story office buildings to address the bulk and scale of the new industrial building that will	-

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory Document	**Section Reference**	**Mandatory Consideration**	**Relevance**	**Section in the EIS**
		(i) heritage issues, *(ii) the relationship of the development with other existing or proposed development on the same site or on neighbouring sites in terms of separation, setbacks, amenity and urban form,* *(iii) bulk, massing and modulation of buildings,* *(iv) street frontage heights,* *(v) environmental impacts, including sustainable design, overshadowing, wind and reflectivity,* *(vi) the achievement of the principles of ecologically sustainable development,* *(vii) pedestrian, cycle, vehicular and service access, circulation and requirements,* *(viii) the impact on, and any proposed improvements to, the public domain,* *(ix) the integration of utilities, building services and waste management infrastructure in the site layout and building design,* *(e) whether the development integrates high quality landscape design in the site layout and building design.*	provide a high quality façade as the background. The main façade on Gow Street will be improved with the demolition of an old existing canteen building to be replaced with a new truck exit and landscape area.	
Considerations under other legislation				
Commonwealth Environment Protection and Biodiversity Conservation Act 1999	Division 1—Requirements relating to matters of national environmental significance	*(1) Division 1—Requirements relating to matters of national environmental significance*	The proposed development does not warrant any impacts on MNES, therefore no further consideration of the EPBC Act is required.	-

MANDATORY CONSIDERATIONS OF THE CONSENT AUTHORITY				
Statutory Document	**Section Reference**	**Mandatory Consideration**	**Relevance**	**Section in the EIS**
Water Management Act 2000	Section 91 – Activity Approvals	*(2) A controlled activity approval confers a right on its holder to carry out a specified controlled activity at a specified location in, on or under waterfront land.*	The Subject Site is located within 40m of a watercourse, being Salt Pan Creek to the east, however it is noted that no development is proposed within 40m of watercourse and as such, a controlled activity approval is not required.	-
Biodiversity Conservation Act 2016	Section 7.9 – Biodiversity assessment for State significant development or infrastructure	*(1) This section applies to—* *(a) an application for development consent under Part 4 of the Environmental Planning and Assessment Act 1979 for State significant development, and* *(b) an application for approval under Division 5.2 of the Environmental Planning and Assessment Act 1979 to carry out State significant infrastructure.* *(2) Any such application is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.* *(3) The environmental impact statement that accompanies any such application is to include the biodiversity assessment required by the environmental assessment requirements of the Planning Agency Head under the Environmental Planning and Assessment Act 1979.*	A BDAR has been prepared and accompanies this EIS. This EIS includes a biodiversity assessment as required.	Refer to **Section 6.1.17** of this EIS.
Protection of the Environment Operations Act 1997	Schedule 1 – Scheduled Activities	*Clause 8 Chemical Production & Clause 9 Chemical Storage*	The proposed development will exceed the chemical production and storage capacities and as such, an EPL is required for the proposed development.	-

APPENDIX D
COMMUNITY ENGAGEMENT TABLE

SSD-71052213

STAKEHOLDER CONSTULATION AND ENGAGEMENT UNDERTAKEN			
Local Community and Sensitive Receivers			
Activity and Stakeholders (S)	**Aim**	**Actions**	**Collateral**
Newsletter ▪ Likely sensitive receivers; and ▪ Possible sensitive receivers.	▪ Introduce the proposed development to the local community early in the process; and ▪ Provide an accessible and flexible contact methods to enable stakeholders to raise issues/concerns prior to submission.	Distribute newsletter to 40 Tier 1 stakeholders (being local community members and business), completed on the weekend of the 27/28th July 2024.	Community newsletter (refer to Appendix A of **Appendix 18**) containing: ▪ Information about the proposed development; ▪ Contact details for HillPDA's engagement team (including a phone number to contact HillPDA via a translation service); ▪ A link to HillPDA's engagement portal; and ▪ A link to DPHI's Planning Portal page for the proposed development.
Engagement portal (website) & online survey ▪ Likely sensitive receivers; and ▪ Possible sensitive receivers.	▪ Introduce the proponent and the proposed development to the local community early in the process; ▪ Provide an opportunity to identify and address any issues or concerns raised (relating to the existing environment or the proposal) prior to submission; and ▪ Provide accessible and convenient option for the wider local community (Tier 1 stakeholders) to provide feedback.	▪ Establish a webpage for the proposal (along with a survey and submissions inbox) on HillPDA's engagement portal; and ▪ Survey active from 26 July 2024 – 31 August 2024.	Engagement portal (refer to Appendix B of **Appendix 18**) containing: ▪ Information about the proposed development; ▪ Contact details for HillPDA's engagement team; ▪ A link to HillPDA's engagement portal; ▪ A link to DPHI's Planning Portal page for the proposal; and ▪ Online survey (refer to Appendix C of **Appendix 18**).
Relevant Agencies and Organisations			
Stakeholder	**Actions**		
DPHI	▪ A pre-scoping meeting was held with DPHI on Friday 12 April 2024 at 2pm and attended by representatives from the project team and Willowtree Planning; ▪ Preliminary architectural plans were provided to Environmental Assessment Officers from DPHI prior to the pre-scoping meeting on Thursday 11 April 2024; and ▪ Prior to issuing project SEARs, DPHI sent letters agencies and organisations for feedback dated 23 May 2024.		

Agencies and Organisations	A letter was distributed to state agencies and peak organisations to inform them of the proposed development and invite feedback during the early planning phase via email on 10 September 2024. Agencies included: ▪ Department of Climate Change Energy, the Environment and Water (DCCEEW); o Environment and Heritage Group; o Water Group; o Environment Protection Authority (EPA); ▪ Heritage NSW; ▪ Transport for NSW; and ▪ Fire and Rescue NSW. Where an agency/organisation was contacted by a technical specialist, the outcome of their discussions has been incorporated into this engagement report. Agencies include: ▪ Sydney Water ▪ Ausgrid ▪ Telstra ▪ NBNCo ▪ Gandangara Local Aboriginal Council
Council	▪ On 2 July 2024, Canterbury-Bankstown Council sent a letter via email to the Senior Environmental Assessment Officer from DPHI involved in processing the SEARs request for the proponent. Council provided a late submission on the issued SEARs document, outlining Council's comments and issues for consideration in the preparation of the EIS; ▪ A meeting, attended by representatives from Selleys, Dulux Group and Willowtree Planning, was held with members from the project team and Canterbury-Bankstown Council on 7 July 2024 for pre-lodgement advice; and ▪ Proponent provided overview of project and Council provided advice on requirements for submission.
Local Aboriginal Community Consultation	▪ 28 May 2024 - Biosis wrote to organisations to develop a list of potentially interested Aboriginal parties to inform their Aboriginal Cultural Heritage Assessment Report (ACHAR); ▪ 29 May 2024 - public notice was published in The Daily Telegraph inviting Aboriginal people who hold cultural knowledge to register their interest in a process of community consultation to provide assistance in determining the significance of Aboriginal object(s) and/or places in the vicinity of the study area; ▪ On 14 June – Aboriginal groups and stakeholders were sent a of invitation to participate in community consultation and share knowledge; ▪ July 2024 - RAPs provided with details about the proposed development works (project information pack); and ▪ 2 July 2024 – RAPs provided with copies of the project methodology.

Local Community Group	On 10 September 2024, a letter containing an overview of project details and contact details to provide feedback or comments was sent to local community groups, including: ▪ Bankstown Bushland Society Inc.; ▪ Bankstown Historical Society Inc.; and ▪ Australian Plants Society – Harbour Georges River Group.

APPENDIX E
MITIGATION MEASURES TABLE

SSD-71052213

By:	Selleys (Dulux Group Australia Pty Limited)
In relation to:	State Significant Development Application (SSD-71052213) For Gow Street Manufacturing and Warehouse Facility
Site:	15 and 20 Gow Street, Padstow (Lott 100 DP1011185 and Lot 53 DP1064349)

Selleys plan to undertake the proposed development, in accordance with the following planned management and mitigation measures.

PLANNED MANAGEMENT AND MITIGATION MEASURES FOR SSD-71052213		
ID	**Management / Mitigation Measure**	**Timing**
Administrative Commitments		
A1	**Commitment to Minimise Harm to the Environment** Selleys will commit to implement all reasonable and feasible measures, to prevent and/or minimise any harm to the environment, that may result from the construction or operation of the proposed development	Prior to construction, during construction, and during operation.
A2	**Terms of Approval** Selleys will carry out the project generally in accordance with the: (a) Environmental Impact Statement; (b) Drawings; (c) Management and Mitigation Measures; (d) Any Conditions of Approval. If there is any inconsistency between the above, the Conditions of Approval shall prevail to the extent of the inconsistency.	Prior to construction, during construction, and during operation.
A3	**Occupation Certificate** Selleys will ensure that Occupation Certificates are obtained prior to the occupation of the facilities.	Prior to operation.
A4	**Compliance** Selleys will ensure compliance with any reasonable requirement(s) of the Secretary of the NSW DPE arising from the assessment of: (a) Any reports, plans, programs, strategies or correspondence that are submitted in relation to this Approval; and (b) The implementation of any recommended actions or measures contained in reports, plans, programs, strategies or correspondence submitted by the Project Team as part of the application for Approval.	Prior to construction, during construction, and during operation.
A5	**Structural Adequacy** Selleys will ensure that all new buildings and structures on the Subject Site are constructed in accordance with the relevant requirements of the National Construction Code.	During construction.
A6	**Construction Environmental Management Plan** Prior to the commencement of construction, Selleys would prepare a Construction Environmental Management Plan (CEMP) that addresses the following:	Prior to construction.

PLANNED MANAGEMENT AND MITIGATION MEASURES FOR SSD-71052213		
ID	**Management / Mitigation Measure**	**Timing**
	(a) Air Quality; (b) Noise and Vibration; (c) Waste Classification; (d) Erosion and Sediment Control; (e) Materials Management Plan; (f) Remediation (g) Acid Sulfate Soils and Salinity; and (h) Community Consultation and Complaints Handling.	
A7	**Site Induction** All staff employed on the site by the construction contractor will be required to undergo a site induction.	Prior to construction.
A8	**Operation of Plant and Equipment** Selleys will ensure that all plant and equipment used on-site, is maintained and operated in proper and efficient manner, and in accordance with relevant Australian Standards.	During operation.
A9	**Monitoring the State of Roadways** Selleys will monitor the state of roadways leading to and from the subject site, during construction, and will take all necessary steps to clean up any adversely impacted road pavements as directed by the Canterbury-Bankstown Council.	During construction.
A10	**Waste Receipts** Selleys will ensure that a permanent record of receipts, for the removal of both liquid and solid waste from the Subject Site, be kept and maintained up to date at all times. Such records will be made available to authorised person upon request.	During construction and operation.
A11	**Complaints Handling** Selleys will prepare an Operational Complaints Handling Protocol for the development, prior to the commencement of operations.	Prior to operation.
A12	**Soil and Water Management** A Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan (ESCP), or equivalent, will be implemented for the construction of the proposed development.	Prior to and during construction.
Specific Environmental Commitments		
Tree Management		
TM1	Selleys will implement all necessary tree protection measures.	Prior to and during construction.
Traffic and Transport		
TT1	Selleys will finalise and implement the Construction Traffic Management Plan (CTMP).	Prior to and during construction.
TT2	Ason Group will finalise and implement the Green Travel Plan (GTP).	Prior to and during operation

PLANNED MANAGEMENT AND MITIGATION MEASURES FOR SSD-71052213		
ID	**Management / Mitigation Measure**	**Timing**
Noise and Vibration		
NV1	Noise and vibration management and monitoring will form part of the CEMP, to be prepared for the project, as outlined in **A6**.	Prior to and during construction and operation
Hazards & Risks		
HR1	Multiple spill kits will be provided around the DG storage areas to ensure spills can be cleaned up immediately following identification.	During operation.
HR2	Aerosols shall be stored in a dedicated storage area which prevents rocketing cans from escalating the incident (i.e. storage in an aerosol cage, separate storage area, or in palletised aerosol cages).	During operation.
HR3	The Subject site shall be designed to contain any spills or contaminated water from a fire incident within the boundaries of the site.	Prior to construction.
HR4	Acid Sulfate Soil and Salinity management will form part of the CEMP, to be prepared for the project, as outlined in **A6**.	Prior to construction.
HR5	Adopt a construction stormwater management plan and associated erosion and sediment control measures in accordance with Landcom Blue Book and Council requirements.	Prior to construction.
HR6	An occupational hygienist shall provide a clearance certificate for the Subject Site following the demolition of existing buildings and removal of all slabs etc from the Subject Site. Once the hygienist has provided a clearance, a geo-environmental consultant shall undertake validation testing to confirm that remnant contaminants are not present at the Subject Site, prior to excavation, detailed waste classification (as required) and removal of soils for off-site disposal.	Following demolition
HR7	Appropriate inspections shall be undertaken during site works, such as inspection during stripping of the upper fill/topsoil for potential HBM including asbestos. The works shall be undertaken in accordance with an unexpected finds protocol (UFP).	During construction
HR8	Bulk excavation shall be undertaken with reference to strategic segregation and stockpiling of upper soils and other fill layers from underlying natural soils, and also segregation of carbonaceous natural soils from other natural soils, to maximise the beneficial re-use of excavated soils and minimise soils requiring disposal to landfill.	During construction
HR9	All existing wells/mine subsidence bores and any future bores that intersect the coal seams/workings shall be grouted to the surface as a precautionary measure in order to remove the possible gas migration pathway between the workings/seams to the surface or underside of the proposed basement slab.	During construction
HR10	Remediation of the Subject Site is to be undertaken in accordance with the Remedial Action Plan	During construction

PLANNED MANAGEMENT AND MITIGATION MEASURES FOR SSD-71052213		
ID	**Management / Mitigation Measure**	**Timing**
Cultural Heritage		
H1	An Unexpected Finds Policy will be developed, in the unlikely event that relics are identified during ground disturbing works.	Prior to construction.
H2	Unexpected Aboriginal objects remain protected by the *National Parks and Wildlife Act 1974*. If any such objects, or potential objects, are uncovered in the course of the activity, all work in the vicinity will cease immediately. A qualified archaeologist would be contacted to assess the find and Heritage NSW and Metropolitan Local Aboriginal Land Council would be notified.	During construction.
H3	If human remains, or suspected human remains, are found in the course of the activity, all work in the vicinity will cease, the site would be secured, and the NSW Police and Heritage NSW would be notified	During construction.
H4	All relevant staff, contractors and subcontractors will be made aware of their statutory obligations for heritage under the NSW *Heritage Act 1977* and best practice as outlined in *The Burra Charter 2013*, during site inductions.	Prior to construction.
Socio-Economic		
SE1	Selleys will notify surrounding businesses and residents one (1) week before commencement of construction activities. Notices should include: ▪ Details of the proposal, including contact details of management team ▪ Hours and expected period of construction ▪ Details regarding process should businesses or residents have concerns, questions or complaints	Prior to construction.
SE2	Selleys will set up a feedback process to manage and respond to stakeholder concerns, questions, or complaints. Selleys will ensure that this process is clear and accessible to stakeholders such as surrounding businesses and residents.	Prior to and during construction.
SE3	Selleys will prioritise engaging with local businesses, where practicable, e.g. site induction for visiting workers to include profile of surrounding food and beverage retailer.	During construction.
Waste Management		
WM1	Effective management of construction materials and construction and demolition waste, including options for reuse and recycling where applicable and practicable, would be conducted. Only wastes that cannot be cost effectively reused or recycled will be sent to landfill or appropriate disposal facilities.	During construction.
WM2	Waste materials produced from the Subject Site preparation and construction activities will be separated at the source and stored separately on-site.	During construction.
WM3	The Site Manager or equivalent role will: ▪ Arrange for suitable waste collection contractors to remove any construction waste from site	During construction and during operaiton

PLANNED MANAGEMENT AND MITIGATION MEASURES FOR SSD-71052213		
ID	**Management / Mitigation Measure**	**Timing**
	▪ Ensure waste bins are not filled beyond recommended filling levels ▪ Ensure that all bins and loads of waste materials leaving site are covered ▪ Maintain waste disposal documentation detailing, at a minimum: o Descriptions and estimated amounts of all waste materials removed from site o Details of the waste and recycling collection contractors and facilities receiving the waste and o recyclables o Records of waste and recycling collection vehicle movements, for example, date and time of loads o removed, licence plate of collection vehicles, tip dockets from receiving facility, and o Waste classification documentation for materials disposed to off-site recycling or landfill facilities. ▪ Ensure lawful waste disposal records are readily accessible for inspection by regulatory authorities such as Blacktown City Council, SafeWork NSW or NSW EPA, and ▪ Remove waste during hours approved by Council.	
WM4	Site inductions, as required under **A7** will ensure the following training is covered: ▪ Legal obligations and targets ▪ Emergency response procedures on-site ▪ Waste priorities and opportunities for reduction, reuse, and recycling ▪ Waste storage locations and separation of waste ▪ Procedures for suspected contaminated and hazardous wastes ▪ Waste related signage ▪ The implications of poor waste management practices, and ▪ Responsibilities and reporting, including identification of personnel responsible for waste management and individual responsibilities.	Prior to construction.
Air Quality		
AQ1	Selleys will finalise and implement an odour management plan / complaint procedure to record and action verified odour complaints in a systemic, auditable and pro-active manner	Prior to and during operation
Flooding		
F1	Selleys will finalise and implement the Flood Safety and Evacuation Strategy	Prior to and during operation