

Final

Statement of Environmental Effects

**Demolition of existing structures and erection
of two (2) attached Warehouses**

65-73 Dunheved Circuit, St Marys NSW

Borg Manufacturing Pty Ltd

12 February 2019

Revision History

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1 Introduction

This Statement of Environmental Effects (SoEE) has been prepared by Borg Manufacturing to accompany a Development Application to Penrith City Council for demolition of existing structures and erection of two attached warehouses on Lot 1 DP 1175850, 65-73 Dunheved Circuit, St Marys, NSW.

This SoEE provides details about the site and proposed development, as well as making an assessment of the proposed development pursuant to the relevant matters under Section 4.15(1) of the *Environmental Planning and Assessment Act 1979*.

1.1 Overview of the Proposed Development

The proposed development is for the construction and operation of warehouse facilities to expand the warehousing capabilities of the existing Borg Manufacturing plant located at Somersby on the Central Coast. The plant manufactures and distributes decorative melamine board products countrywide. The new warehouse in St Marys would allow for the efficient distribution of products within and beyond the Sydney region. The warehouses will be used to receive, store and further distribute finished products to customers. No sales will happen from the site. The proposal also includes a smaller warehouse that could potentially be leased to a similar company. The new warehouses will provide for a number of new jobs within the Penrith area.

1.2 Structure of SoEE

This SoEE is structured as follows:

- **Section 1** – Introduction
- **Section 2** – Site Description
- **Section 3** – Proposed Development
- **Section 4** – Statutory Considerations
- **Section 5** – Environmental Impact Assessment
- **Section 6** – Conclusion

2 Site Description

2.1 Location and Context

The subject land is located in the St Marys Industrial Park within the Penrith City Council Local Government Area (LGA). The subject site is a large irregular shaped parcel of land located on western side of Dunheved Circuit, approximately 600m south of its intersection with Links Rd. The site is known as 65-73 Dunheved Circuit, Lot 1 DP 1175850.

The site is surrounded by industrial development to the north and east, with a vacant site located to the south. To the west of the site is Links Road, which borders Dunheved Golf Course.

Figure 1 shows the location of the subject site.



Figure 1: Location of the Subject Site (Base Map: SixMaps)

2.2 Existing Site Conditions

2.2.1 Topography and Drainage

The site is located within an established industrial estate and parts of it have undergone significant development. The site is relatively flat with a slight fall towards the rear of the site toward Links Road, falling from 25.70 AHD to 23.25 AHD. An agreement for a drainage easement through the property to the rear has been confirmed by LendLease, with documentation included in the DA documents. The easement will allow stormwater from the site to drain to existing drainage infrastructure on Links Road.

The nearest watercourse to the subject site is located over 100m to its south.

The site and broader environs do not accommodate features of natural or topographical significance.

The site is affected by mainstream flooding from South Creek, which is located approximately 400m to the west.

2.2.2 Vegetation

The site is devoid of any vegetation.

2.2.3 Indigenous Heritage

An AHIMS search did not return any known items either on the site or in close proximity to the site.

2.2.4 Non-Indigenous Heritage

A desktop search of the NSW State Heritage Inventory and Penrith City Council's Heritage Register was undertaken. This concluded that no State or Council heritage items are found within the subject site, or in close proximity.

2.2.5 Bushfire

The site is not identified as bushfire prone land on the Penrith City Council bushfire prone land map.

2.2.6 Flooding

The site is partly affected by mainstream flooding from South Creek. The mainstream 1% AEP flood level affecting the site is estimated to be RL21.0m AHD. The most recent survey provided with the DA documents indicate that the existing site levels are higher than 21.0m AHD, with the front of the site 25.70m AHD to falling to 23.25m AHD at the rear.

The proposed finish floor level of the warehouses and workshop will be 24.35m AHD

2.2.7 Traffic and Transport

The site fronts Dunheved Circuit in St Marys. Access to the proposed warehouse facility will be provided through from separate entry and exit driveway.

Dunheved Circuit is a local road providing access to a large number of industrial developments within the Dunheved Business Park. It has a 9m wide carriageway in the vicinity of the site with kerb and gutter on both sides. It is undivided but operates as a two-lane road, one in each direction. The road varies between no parking and unrestricted on street parking conditions. The speed limit on this road is 60km/h.

Access to the proposed development will be provided by Dunheved Circuit at the two driveways as follows:

- Northern Driveway 10m wide shared driveway
- Southern Driveway 8m wide shared driveway

The northern driveway will provide entry only movement whilst the southern driveway will provide exit movement, hence the general traffic flow around the site will be in an anticlockwise direction.

Vehicles can access the site from either direction; however, trucks leaving the site will be required to exit in a northbound direction due to the limited carriageway width available on Dunheved Circuit to the south of the site. It is expected that signage and traffic management plan will be required to ensure truck drivers leave the site to the north. Clear visibility is available at the exit driveway, with 69m sightline available to the north and south as required by the Australian Standard.

The proposed development will also provide 136 parking spaces (including two accessible spaces), comprising of 53 spaces within the car park and 83 provisional spaces.

The access, parking and circulation area generally complies with AS/NZS 2890.1-2004 Parking Facilities –Off Street Car Parking and AS 2890.2-2002 Parking Facilities – Off Street Commercial Vehicle Facilities suitable for vehicles up to 26m B-doubles.

2.2.8 Utility Services

Sewer, water, electrical and telecommunications services are all available to the subject site.

3 Proposed Development

The proposed development is for the construction and operation of warehouse facilities to expand the warehousing capabilities of the existing Borg Manufacturing plant located at Somersby on the Central Coast. The plant manufactures and distributes decorative melamine board products countrywide. The new warehouse in St Marys would allow for the efficient distribution of products within and beyond the Sydney area. The warehouses will be used to receive, store and further distribute finished products to customers. No sales will happen from the site. The proposal also includes a smaller warehouse that could potentially be leased to a similar company. The new warehouses will provide for a number of new jobs within the Penrith area. The proposed warehouse development includes:

- Warehouse area of 21,950m²- Main warehouse 16,950m², Secondary warehouse 5,000m²
- Ancillary Office and amenities area of 307.2m²
- Hardstand areas and driveway around the warehouse
- 142 car parking spaces and 2 disabled car parking spaces
- Stormwater detention and retention system
- Signage on building

Hours of operation for the warehouses on the site are proposed to be 7 days per week 24 hours per day.

The site will have 45 employees across the whole site.

It is expected that there will be approximately 35-40 truck movements to and from the site on a normal day. The site will be serviced by both heavy rigid and medium rigid vehicles.

The attached plans show the detailed design of the proposed development.

4 Statutory Considerations

4.1 Environmental Planning and Assessment Act 1979

Section 4.15 of the *Environmental Planning and Assessment Act 1979* states the following:

(1) Matters for consideration—general

In determining a development application, a consent authority is to take into consideration such of the following matters as are of relevance to the development the subject of the development application:

(a) the provisions of:

- (i) any environmental planning instrument, and*
 - (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 Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and*
 - (iii) any development control plan, and*
 - (iiia) any planning agreement that has been entered into under section 93F, or any draft planning agreement that a developer has offered to enter into under section 93F, and*
 - (iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph), and*
 - (v) any coastal zone management plan (within the meaning of the Coastal Protection Act 1979), that apply to the land to which the development application relates,*
- (b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,*
- (c) the suitability of the site for the development,*
- (d) any submissions made in accordance with this Act or the regulations,*
- (e) the public interest.*

Section 4.15(1) plays an important role in the development assessment process and in managing change in an environmentally responsible way. It sets broad categories, each of which covers a range of issues that arise when preparing and assessing development applications.

The following matters are of relevance to this development application and have been taken into consideration with the preparation of the proposal.

4.2 State Environmental Planning Policies

4.2.1 Sydney Regional Environmental Plan No.20 – Hawkesbury-Nepean River (No 2 – 1997)

The aim of the *Sydney Regional Environmental Plan No.20 – Hawkesbury-Nepean River (No 2 – 1997)* (SREP 20) is to protect the environment of the Hawkesbury-Nepean River system by ensuring that the impacts of future land uses are considered in a regional context.

Part 2 of SREP 20 provides for consideration of relevant policies and strategies setting out a range of considerations that need to be made in determining any development proposal. This includes matters relating to:

- General planning considerations, including the aim of the plan, strategies listed in the plan, whether there are any feasible alternatives, and how environmental impacts of the proposal will be addressed and monitored.
- Specific planning policies and recommended strategies for total catchment management, environmentally sensitive areas, water quality, water quantity, cultural heritage, flora and fauna, riverine scenic quality, agriculture/aquaculture and fishing, rural residential development, urban development, recreation and tourism, and the Metropolitan strategy.

Section 11 sets out development controls for stated developments. The proposed development is not identified in Section 11 as requiring additional controls to those in any other relevant planning instrument.

The proposed development incorporates appropriate drainage that demonstrates that stormwater can be adequately conveyed to the existing street network. Details on the erosion and sediment controls are provided as part of this application that can be implemented throughout construction and reinforced through conditions of consent. The proposal will meet the recently adopted WSUD measures as required in order to achieve appropriate water quality for stormwater discharge. As such, the proposed development is considered consistent with the SREP.

4.2.2 State Environmental Planning Policy No.55 (Remediation of Land)

This policy requires consideration to be given to previous uses on the site and whether it needs to be remediated for potential future uses. Clause 7(1) (b) and (c) of SEPP No.55 require that where land is contaminated, Council must be satisfied that the land is suitable in its contaminated state or will be suitable after remediation for the purpose for which the development is proposed.

Council records indicate that the subject site may be potentially contaminated given past industrial uses.

A detailed site investigation was carried out by *DRC Environmental* (dated 11 February 2019). The report concludes that the site is suitable for the proposed industrial land use. The development is consistent with the provisions of SEPP 55.

4.2.3 State Environmental Planning Policy No.64 (Advertising and Signage)

The proposal includes the erection of signage for the purposes of identification.

The location of the proposed signage is provided within the Architectural Plans at Appendix B.

Directional signage internal to the site would also be provided to ensure a high level of legibility is achieved for all vehicles and pedestrians accessing the various areas of the site.

Pursuant to Clause 8 of SEPP 64, a consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied:

- (a) that the signage is consistent with the aims/objectives of the Policy, and*
- (b) that the signage satisfies the assessment criteria specified in Schedule 1 of SEPP 64.*

These matters are addressed below.

Aims and Objectives of SEPP 64

SEPP 64 aims:

- (a) to ensure that signage (including advertising):*
 - (i) is compatible with the desired amenity and visual character of an area, and*
 - (ii) provides effective communication in suitable locations, and*
 - (iii) is of high quality design and finish and*
- (a) to regulate signage (but not content) under Part 4 of the Act and*
- (b) to provide time-limited consents for the display of certain advertisements, and*
- (c) to regulate the display of advertisements in transport corridors, and*
- (d) to ensure that public benefits may be derived from advertising in and adjacent to transport corridors.*

The proposed signage is proposed for the purpose of business identification and is considered to achieve the objectives of SEPP64 as it relates directly to the use of the site for warehousing facilities and reinforces the industrial character of the site in accordance with the prevailing industrial character of the area. The proposed signage would be of a high quality design and finish and would integrate with the built form on the site in terms of siting, scale and design.

The proposed signage is considered to comply with Schedule 1 as outlined below.

1. Character of the area

The proposed signage is compatible with the industrial character of the site and its surrounds and would support the operation of the proposed facility on the site

2. Special areas

The site is not located in proximity of any significant built or natural sites or areas. The signage would be of a high quality design and finish and would improve the visual amenity of the site through effective identification.

3. Views and vistas

The proposed signage would be of a height and scale consistent with the built form on the site and will not disrupt any views or dominate views towards the site. The proposed signage is will not dominate the skyline.

4. Streetscape, setting or landscape

The signage has been designed in respect of the proposed built form on the site to effectively identify the warehouse/industrial facilities whilst not being visually obtrusive. The proposed signage is compatible with the industrial character of the site and its surrounds.

The signage would visually define the facility on the site and would be integrated with façade treatment to create a visually coherent built form.

5. Site and building

The signage is of suitable scale, design for its intended purpose to effectively identify the business operating on-site, and would integrate with the proposed built form and facade design to achieve visual coherence.

7. Illumination

Illumination would not result in unacceptable glare. The site is not in proximity of any residential or other sensitive land uses and would not adversely affect the amenity of any development.

8. Safety

The proposed signage will not affect the safety of any road or road reserve.

Based on the above, the proposed development is considered consistent with the provisions of SEPP 64 and the existing industrial estate.

4.3 Penrith Local Environmental Plan 2010

4.3.1 PLEP Part 2 – Permitted or Prohibited Development

Under the *Penrith Local Environmental Plan 2010* the subject site is zoned IN1 General Industrial (**Figure 2**).

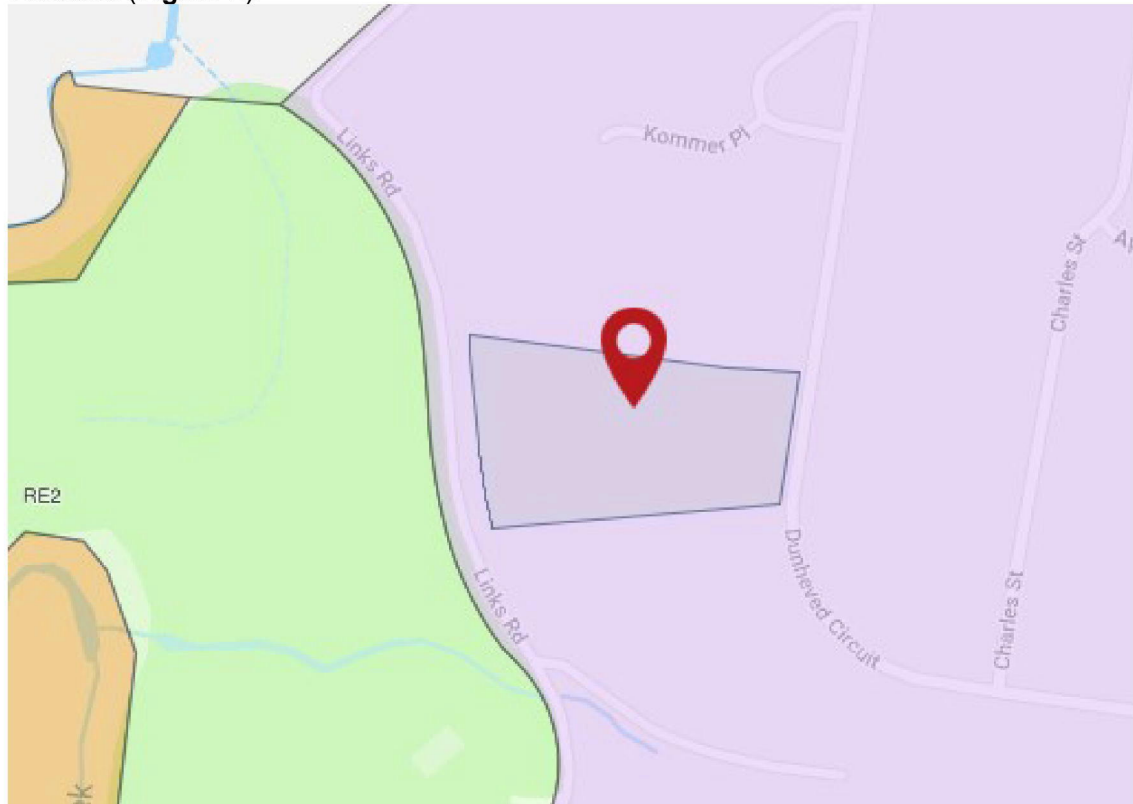


Figure 2: Land Zoning (Base Map: Planning Portal NSW)

The proposal's compliance with the objectives of zone IN1 is outlined in **Table 2** and the prescribed development types in zone IN1 are detailed in **Table 3**.

Table 2 – Compliance with the Zone Objectives

Objective	Compliance	Comment
To provide a wide range of industrial and warehouse land uses.	Yes	The proposed development is for warehousing and distribution of manufactured items, storage and industrial units, which contributes to the variety of land uses in the locality.
To encourage employment opportunities.	Yes	It is anticipated that at least 45 FTE jobs will be created as a result of the proposed development. The construction will itself create about 30 jobs over a 12 month period.
To minimise any adverse effect of industry on other land uses.	Yes	The proposed development is located within an established industrial estate, with suitable access to large collector roads. The proposal will not impact on any adjoining land uses.

Objective	Compliance	Comment
To support and protect industrial land for industrial uses.	Yes	The proposed development is industrial and is planned for land zoned for this purpose.
To promote development that makes efficient use of industrial land.	Yes	The proposal is considered to be efficient use of industrial land given the size and scope of the operations on site.
To permit facilities that serve the daily recreation and convenience needs of the people who work in the surrounding industrial area	N/A	The proposal will increase the amount of people working within the industrial area.

Table 3 – Prescribed Development Types in Zone IN1

2 Permitted Without Consent	Nil
3 Permitted With Consent	Animal boarding or training establishments; Boat building and repair facilities; Car parks; Depots; Environmental facilities; Environmental protection works; Flood mitigation works; Freight transport facilities; Garden centres; General industries; Hardware and building supplies; Industrial retail outlets; Industrial training facilities; Industries; Kiosks; Landscaping material supplies; Light industries; Neighbourhood shops; Places of public worship; Plant nurseries; Recreation areas; Roads; Rural industries; Self-storage units; Signage; Storage premises; Take away food and drink premises; Timber yards; Transport depots; Truck depots; Vehicle body repair workshops; Vehicle repair stations; Warehouse or distribution centres
4 Prohibited	Hazardous industries; Offensive industries; Any other development not specified in item 2 or 3

The *Penrith Local Environmental Plan 2010* provides the following definitions:

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, and includes local distribution premises.

The proposal is for the warehousing and distribution of products manufactured elsewhere. There will be no retail sales from the site. This constitutes warehouse and distribution centre, which are all permitted with consent in the IN1 zone.

4.3.2 PLEP Clause 4.3 Height of Buildings

The maximum building height identified for the site is 12m. The proposed warehouses have a total height of 14.620m, which does not comply with the prescribed height control. A request to vary the height control under clause 4.6 is provided as **Appendix A**.

4.3.3 PLEP Clause 4.4 Floor Space Ratio

The site does not have a Floor Space Ratio control under the LEP. The building is consistent with adjoining buildings in regards to FSR.

4.3.4 PLEP Clause 4.6 Exemptions to development standards

The Proposal includes building heights that would exceed the maximum building height limit. A variation to the building height limit has been submitted with the application.

4.3.5 PLEP Clause 7.1 Earthworks

The proposal will require minor earthworks to level the site to allow for at grade car parking and access. The earthworks will also assist in the capture of stormwater on the site. The proposed earthworks will not have a detrimental impact on any environmental functions or processes, will not impact any neighbouring uses or any items of cultural and heritage significance. Suitable soil and erosion controls will be implemented on site to reduce any impacts during construction.

4.3.6 PLEP Clause 7.2 Flood Planning

The site is partly affected by mainstream flooding from South Creek. The mainstream 1% AEP flood level affecting the site is estimated to be RL21.0m AHD. The most recent survey provided with the DA documents indicate that the existing site levels are higher than 21.0m AHD, with the front of the site 25.70m AHD to falling to 23.25m AHD at the rear.

The proposed finish floor level of the warehouses and workshop will be 24.35m AHD

The proposal is consistent with the provisions of this clause.

4.3.7 PLEP Clause 7.4 Sustainable Development

The Proposal aims to incorporate best practice sustainable design principles and practices into the design and operation of the site.

4.3.8 PLEP Clause 7.5 Protection of scenic character and landscape values

The proposed site is located adjacent to land identified as scenic protection land. Given the separation of the site and proposed landscaping along the rear boundary, the development is unlikely to affect the scenic lands to the rear. The warehouses are located within an established industrial area, with many other large industrial buildings located adjacent to the scenic protection lands. The development incorporates a 5m landscape area at the rear of the site to minimise any potential impacts.

Links Road to the rear is not a major road, and the golf course is not a public place as referenced in this clause.

4.4 Penrith Development Control Plan 2014

4.4.1 DCP Part C- City Wide Controls

C1-Site Planning and Design Principles

The site sits within an established industrial precinct that has undergone significant development. A Site Analysis Plan accompanies the application. The design proposal responds to key site planning issues identified as part of site analysis.

The proposed warehouses are considered suitable in relation to the established context and character of the industrial area. The development is similar to a number of other industrial buildings in close proximity. The proposed setbacks are consistent with the prevailing within the area. The façade treatment, whilst plain, is consistent with adjoining development. The roof form is suitable for industrial development and the building responds to topography of the site.

The proposal adopts the principles of crime prevention through environmental design (CPTED). The design allows for natural surveillance of public areas from open roller doors and windows facing the street. The entrance to the site are easily identifiable, and lighting will be used to illuminate entrances and driveways. The site will be surrounded by 2.1m chain link fences for security and access will be controlled by security passes for employees.

C3- Water Management

A stormwater management plan has been prepared and shows that all drainage on the site is to be collected in a pit and pipe network and conveyed to the on-site detention located in the north-western corner to be drained to the existing infrastructure on Links Road via a drainage easement. The drainage design has been designed to convey the 5%AEP storm event.

The management plan also demonstrates achievement of WSUD outcomes required by Council.

C4- Land Management

Earthworks will be undertaken to achieve a level site for the purposes of access and stormwater. The proposed earthworks are considered minor, with a bulk earthworks plan submitted with the application. The areas of cut will be used as fill on the site, eliminating the need for imported fill, however, some excess soil will be removed from the site.

A contamination report has been prepared for the site that concludes that the site is suitable for industrial land use, with minor levels of post tenancy clean up required once the site becomes vacant.

Suitable soil and erosion controls will be implemented on site to reduce any impacts during construction.

C5- Waste management

A Waste Management Plan (WMP) for the construction stage of the development accompanies the development application. All waste bins can be accommodated within the building footprint and will be serviced by a private contractor.

C6- Landscape design

A Landscape Concept Plan accompanies the application and provides for a mix of plantings that integrates with the overall development. The plants that will be used in the landscaping will be varieties that require low levels of maintenance and are drought resistant to reduce water use within the development.

C7- Culture and heritage

The site is not a heritage item nor does it adjoin or be site in close proximity to any heritage item or conservation area.

C9- Advertising and Signage

The proposed business identification signage is consistent with the objectives of this section. The signage will be of high quality, is suitable in relation to the design of the building and will only display the business name.

C10- Transport, Access and Parking

A traffic, access and parking report has been prepared by Barker Ryan Stewart (dated January 2019).

Council's DCP requires the development to provide 226 car parks, whilst the RMS Guide requires the development to provide 79 parking spaces. In response, the development provides 136 spaces that are designed in compliance with the Australian Standards, of which 53 are located within the main car parking area and 83 are provisional spaces. Shift workers are not rostered at the same time; hence peak parking demand would occur during the shift crossover period. The parking assessment concluded that the main car parking area would accommodate all parking demand on-site with no reliance upon on-street parking.

Penrith Council DCP does not require accessible spaces however, two have been provided.

Approximately 35-40 trips per hour is expected to be generated from the development, which corresponds to an additional vehicle every 1.5 minutes – 2 minutes to the external road network. As such, the development is supportable under traffic generation grounds. Swept path analysis demonstrates site access and internal circulation for vehicles up to 26m B-doubles and loading dock access for 19m AV's and 8.8m MRV's. These facilities are also considered practical and safe ensuring that all traffic generated by the development can enter and exit the site in a forward direction. The traffic will operate anticlockwise around the site, with entry provided by the northern driveway and exit provided by the southern driveway. Trucks would be required to leave the site to the north due to the limited carriageway width available on Dunheved Circuit to the south of the site. It is expected that signage and traffic management plans would be required to inform truck drivers to leave to the north.

The Traffic Impact Study concludes that the subject site is suitable for the proposed development in relation to the impact of traffic, car parking provision, vehicle and pedestrian access and safety considerations.

C12- Noise and Vibration

Given the nature of the development and the less intensive uses, as well as the surrounding development, vehicles and plant are not considered significant noise generators.

The closest sensitive receivers, being residential properties are located 1.1km to east and northeast. Residential properties are also located approximately 1.3km to the west of the site.

The use as a warehouse will not generate noise or vibration that will affect any sensitive receivers. General industrial noise is expected from site generated from loading and unloading of trucks, forklift movements and stacking of product indoors.

Construction noise impacts will be managed through the implementation of appropriate hours of operation on site as defined by Council's standard development conditions.

Operational noise impacts will be consistent with other land uses occurring within the location.

C13- Infrastructure and services

All services are available on site. An agreement for a drainage easement through the property to the rear has been confirmed by LendLease, with documentation included in the DA documents. The easement will allow stormwater from the site to drain to existing drainage infrastructure on Links Road.

4.4.2 DCP Part D4 – Industrial Development

D4.1- Key Precincts

The subject site is located within Precinct 2 - Dunheved/St Marys

D4.2- Building Height

The proposed warehouses will have an overall height of 14.62m. The height does not comply with the requirements of the LEP; a variation request has been prepared in accordance with clause 4.6. The proposed building is consistent with the surrounding industrial buildings in relation to bulk and scale. The building will have minimal impact on the surrounding environment and will not impact any significant views from public spaces. Landscaping will be used within the rear setback area to minimise impacts of the development when viewed from Links Road and the Dunheved Golf Course.

D4.3- Building Setbacks and Landscape

The proposed building has front setback to Dunheved Circuit varying from 17.6m on the southern side to 40m on the northern side. The front setback incorporates car parking for 53 cars, along with a large landscaped area. The proposed landscaped area will provide adequate screening of the car park and will improve the overall appearance of the development within the streetscape.

The building will have a 24m setback to the rear boundary. A 5m landscape buffer will be located along the rear boundary to minimise visual impacts when viewed from Links Road and Dunheved Circuit.

D4.4- Building Design

The proposed building design is consistent with the prevailing designs within the Dunheved industrial area. The elevations will be broken up, with pre-cast concrete panel on the bottom of the building, with "surfmist" colorbond above. The proposed colour scheme and design are considered suitable for an industrial building of this size. The building will be similar in design to the adjoining warehouse/storage facility located adjacent at 59 Dunheved Circuit.

The office and administration section of the building is located at the front of the site, with the entry point highly visible and accessible from the front car park.

D4.5- Storage of materials and chemicals

All goods and any required chemicals will be stored within the building. All tanks will be located to the rear of the site.

D4.6- Accessing and servicing the site

All vehicles will be able to leave the site in a forward direction due to the circular driveway around the building. Due to the narrowness of Dunheved Circuit, all trucks exiting from the southern driveway will be required to turn left only. Vehicle manoeuvring paths have been included in the submitted plans. A traffic report has also been prepared.

D4.7- Fencing

The site will be surrounded by a 2.1m security fencing, with a 1.8m fence located on the front boundary. The fencing will be standard chain link open fencing.

D4.8- Lighting

Adequate lighting will be provided at all entrances and exits of the building, along with the entry and exits to the site. Given the industrial nature of adjoining uses, light spill is not considered to cause issues.

5 Environmental Impact Assessment

5.1 Traffic and Transport

Access to the warehouse will from Dunheved Circuit via two driveways, a northern and southern entrance and exit. Dunheved Circuit is a loop road that services the majority of the industrial estate. Dunheved Circuit joins both Links Road at both ends, which then joins Forrester Road.

There are no footpaths or cyclist facilities within the general locality of the subject site. Given the relative isolation of the site, it can be seen that there are minimal pedestrian demands in the area. Pedestrians are able to walk along the verges to both sides of the roads as required or to the side of the road. Cyclists are able to ride on the road as required.

The site is not serviced by trains. There is a regular bus route along Forrester Road that connects commuters to Penrith Station and other points of interest.

It is proposed to construct industrial warehouses on the subject site with access/egress points on to Dunheved Circuit. Heavy vehicles can enter and exit the site in a forward direction without the need to turn around onsite.

Vehicles can access the site from either direction; however, trucks leaving the site will be required to exit in a northbound direction due to the limited carriageway width available on Dunheved Circuit to the south of the site. It is expected that signage and traffic management plan will be required to ensure truck drivers leave the site to the north. Clear visibility is available at the exit driveway, with 69m sightline available to the north and south as required by the Australian Standard.

It is considered that the proposed development will have a low overall impact upon the road network in the general vicinity of the subject site. The roads in the general vicinity of the subject site have been designed to cater for the demands of the industrial estate, are well laid out and the key intersections are controlled by roundabouts. The access to the site is located on a section of road offering good visibility for drivers entering and exiting the site, with sight distances exceeding the requirements of AS2890.

5.2 Bushfire

As discussed in **Section 2.2.6**, the proposed development will remove the remaining isolated pocket of vegetation in the locality, and is surrounded by developed industrial land, therefore no further assessment of bushfire risk is required.

5.3 Heritage

5.3.1 Non-Indigenous Heritage

A review of the NSW Heritage database and Penrith LEP 2010 did not identify any heritage items on the subject site, nor in the locality that would be impacted by the proposal.

5.3.2 Aboriginal Archaeology

An AHIMS search was undertaken for the subject site. The search did not uncover any aboriginal sites on or near the site.

5.4 Ecology

The site has been used as industrial for many years. The site is void of any vegetation. The development will not affect any ecological community.

5.5 Stormwater Management

A Stormwater Management Plan and Report (Barker Ryan Stewart, January 2019) that includes measures to manage stormwater runoff from the proposed development, is submitted with this development application.

An agreement for a drainage easement through the property to the rear has been confirmed by LendLease, with documentation included in the DA documents. The easement will allow stormwater from the site to drain to existing drainage infrastructure on Links Road.

5.6 Soils and Geology

5.6.1 Erosion and Sediment Control

During construction of the development, erosion and sediment control will be required to limit the pollutant runoff from the site into the existing downstream stormwater drainage system. Erosion and sediment controls such as sediment fence, pit inlet filters and stabilized site access will be adopted to control the runoff of sediment from site until the development is sufficiently stabilised.

Erosion and sediment control devices will be installed on-site prior to the commencement of earthworks and maintained until the area is stabilised. Erosion and sediment control measures will be generally in accordance with the relevant requirements of *Managing Urban Stormwater: Soils and Construction Guideline* (Landcom, 2004) and Gosford DCP 2013.

5.6.2 Contamination

Given the past uses of the site, a contamination assessment has been undertaken for the site in accordance with the requirements outlined within *SEPP 55- Remediation of Land*. The report concludes that the site is suitable for industrial land use, with minor levels of post tenancy clean up required once the site becomes vacant.

5.7 Waste Management

A Waste Management Plan for the proposed development has been prepared and is submitted with the development application. The Waste Management Plan for the site has been developed taking into consideration the principles of the *NSW Waste Avoidance and Resource Recovery Strategy 2014-21* (WARR). This involves managing the waste in accordance with the waste hierarchy established under the *Waste Avoidance and Resource Recovery Act 2001*.

The NSW WARR aims to maximise conservation of natural resources and to minimise environmental harm from waste management and disposal of solid waste.

The specific objectives of the Waste Management Plan include:

- Reduce waste generation associated with site construction and operational activities;
- Where waste generation is unavoidable, promote reuse and recycling;
- Where on-site reuse or recycling is not practicable, appropriate off-site recycling or disposal facilities should be employed, ensuring the responsible treatment of all waste streams; and
- Ensuring all waste disposal is undertaken lawfully.

5.8 Noise

There will be some noise generated from the construction and operation of the proposed development. The subject site is located in Dunheved Estate, which is an established industrial precinct. The adjoining properties in the vicinity of the subject site are industrial/manufacturing premises.

The warehousing proposal is not considered a use that generates offensive noise that will impact other uses in the vicinity, or will not impact on any sensitive receivers. The operation of the facility will generate noise consistent with the loading and unloading of trucks, warehousing operations including the stacking of goods and use of forklifts.

Construction noise will be managed generally in accordance with the *Interim Construction Noise Guideline* (Department of Environment and Climate Change, 2009). Operational Noise will be managed generally in accordance with the *Noise Policy for Industry* (NSW Environment Protection Authority, October 2017).

Construction and operational noise can represent a significant risk of impact on the amenity of sensitive receivers. This assessment focuses on applying work practices most suited to minimising noise impacts. The aim is to protect the majority of residences and other sensitive land uses from noise pollution most of the time.

The nearest noise sensitive receptors are residential properties located in excess of 1000 metres to the west of the proposed development. The subject land and the residential properties are separated by Dunheved Golf Course and environmental land adjoining South Creek.

Construction work will only be undertaken during recommended standard hours for construction as shown in **Table 9**.

Table 9 – Recommended Standard Hours for Construction Work

Work Type	Recommended Standard Hours of Work
Normal construction	Monday to Friday 7am to 6pm Saturday 8am to 1 pm No work on Sundays or public holidays

Management measures proposed to minimise noise generation during construction and operation of the development include:

- Select appropriate sized equipment for the task, such as excavation equipment;
- Select low noise emission plant where possible;
- Avoid, where possible, noisy plant working simultaneously close together;
- Ensure all equipment is equipped with reasonable and feasible noise control (e.g. mufflers, acoustic enclosures, flashing lights or 'quackers' as an alternative to traditional reversing beepers) and is turned off when not in use;
- Ensure equipment is operated in the correct manner and adequately maintained - including replacement of engine covers, repair of defective silencing equipment, tightening of rattling components, repair of leakages in air lines and shutting down equipment not in use; and
- Ensure traffic movement is kept to a minimum, e.g. ensure trucks are fully loaded so that the volume of each delivery is maximised.

5.9 Air Quality

There is the potential for dust to be generated during the construction phase of the proposed development. Dust management measures will be implemented to control, to the maximum extent practicable, the generation of dust onsite and the migration of dust offsite.

Management measures proposed to minimise dust generation during construction of the development include:

- Continual evaluation of prevailing weather conditions. Excavation/fill works to cease or be modified if dust observed leaving the site.
- Stabilise exposed areas as soon as practicable.
- Spray water on unsealed areas if dust being generated and observed leaving the site.
- Minimise the height from which dust-generating material is dropped.
- Minimise the surface area of a work zone.
- Construction plant and equipment are to be maintained and serviced regularly.
- Efficient use of plant and equipment, e.g. turning off idling plant and equipment when not in use.
- Covering of truck loads before leaving the site.
- Removal of dirt and debris from the tyres and underside of trucks prior to leaving the site.

It is envisaged that operation of the site will generate minimal dust as, no dust generating activities are proposed. Therefore no management measures are recommended for operational dust management.

5.10 Socio Economic

The proposed development is estimated to generate 50 jobs during construction, and 45 ongoing jobs during operation of the warehouse facility. This will have a positive economic impact for both the construction industry, and on job creation for residents of the Penrith area. These new jobs create flow on effects within the local economy.

There will also be a positive social impact in the region through economic growth. The proposed works will not create the need for any additional recreational or community infrastructure. The job creation will lead to increased spending in the local economy and flow on effects from this spending.

5.11 Landscaping

Landscaping is proposed as part of the proposed development. A Landscape Plan has been prepared for the proposal and is submitted with the development application.

6 Conclusion

This SoEE is to accompany a Development Application to Penrith City Council for demolition of existing structures and erection two attached Warehouses at Lot 1 DP 1175850, 65-73 Dunheved Circuit, St Marys, NSW.

The proposed development is permissible under the PLEP 2010, and is generally compliant with the relevant PLEP 2014 and PCDCP 2013 provisions. The proposed variation to the height limit is considered well founded, with the height control found unnecessary in this case given the limited impact on adjoining properties and the benefit of the increased height in accordance with clause 4.6 of the LEP. The proposal provides socio-economic benefits to the community. The environmental impact of the proposed construction and operation of the warehouse facility will be minimal.

It is therefore considered that after weighing up the social, economic, and environmental assessments undertaken as part of this SoEE that the proposal will provide positive benefits to the community.