

Preliminary Environmental Assessment Report

Redevelopment of the Eastern Creek Plant and Animal Quarantine Station

60 Wallgrove Road, Minchinbury



Prepared for Afteron Ltd May 2009





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1 Introduction

1.1 Background

In December 2005 the NSW Government announced the creation of a Western Sydney Employment Hub within *City of Cities: Metropolitan Strategy*. The Hub is an area of some 2,450 hectares and is a strategic resource for greenfield employment land supply for Sydney in coming years. The subject site is identified as Precinct 9 within the Hub.

The owners of the site have commissioned ICPS Pty Ltd to prepare a Concept Plan application to establish an appropriate approvals' regime for the site consistent to its strategic purpose. The current zoning of the site prohibits employment and general industrial land uses.

1.2 Site Location & Context

The site is 21.86 hectares in size and is situated in the western Sydney suburb of Minchinbury. While the site is located at the intersection of the M4 and M7 Westlink Motorways, it relies on direct vehicle access to Wallgrove Road (refer Figure 1 & 3). The site does not directly adjoin any existing or future employment lands, however it is broadly situated within a sub-regional grouping of employment lands at Eastern Creek, Minchinbury, and Huntingwood (refer Figure 2).

The site is within the local government area of Blacktown City Council, and within the State electorate of Mount Druitt.

The site is currently used by Australian Quarantine and Inspection Service (AQIS) and is known as the Eastern Creek Quarantine Station (ECQS). ECQS provides post entry quarantine services for animals (cats, dogs, and horses) and high risk plant species (primarily fruit producing species and grasses).

The quarantine facility contains 392 dog kennels, 144 cat kennels, 90 horse stables (plus paddocks and yards) and one secure enclosure which comprises 12 cubicles to house 24 queen bees. A further 57 detector dogs used by Customs are housed at the facility. In addition to a diagnostic laboratory, the Plant Quarantine facility comprises 274m² of glasshouse space, and 542m² of screen house space, as well as ancillary storage and administration buildings.

In 2001 the site was sold by the Commonwealth, and AQIS now occupies the site pursuant to a lease which is due to expire in December 2010. At that time the Commonwealth has the ability to exercise some or all of a 5 year option if it so chooses.

Partly in response to the equine influenza outbreak in 2007, a review of Australia's Quarantine and Biosecurity Arrangements was undertaken in 2008. On 18 December 2008 a review report was released by the Minister and indicated in-principle agreement to all 84 recommendations of the panel relating to national quarantine and biosecurity services. While it is not clear exactly what impact this will have the current AQIS operations at Eastern Creek, certain recommendations (particularly no. 61-62) suggest that a review of resource requirements, cost-recovery, and ownership and operations of current Quarantine Stations will be undertaken. Implementing those recommendations may result in the current Quarantine facility being relocated.



The current use of the site does not make efficient nor effective use of the site area, and the strategic value of the Quarantine Station within the Sydney region has been underlined with the opening of the nearby Westlink M7 Motorway in December 2005.





Figure 2 – Western Sydney Employment Hub

60 Wallgrove Road, Minchinbury Preliminary Environmental Assessment April 2009



Forming an "L" shape around the northern and western boundaries of the site is the Pinegrove Cemetery. This cemetery, combined with the adjoining regional roadways, defines this precinct which enjoys a strategic position within the broader WSEH.

The nearest residential properties are 260 metres to the north, and 550 metres to the west. Adjoining the southern and eastern site boundaries are the M4 Motorway and Wallgrove Road. Further to the east and south (across Wallgrove Road/Westlink M7 and the M4 Motorway) are conservation areas or regional parkland zoned land.







1.3 Statutory Context

Whilst there is both State and Commonwealth legislation that affects the subject proposal, the key planning approval is obtained via the provisions of the *Environmental Planning and Assessment Act 1979 (NSW)*.

On 20 March 2009, the Director General of the NSW Department of Planning, as the authorised delegate of the Minister for Planning, formed the opinion that the project was a "Major Project" for the purposes of Part 3A of the EP & A Act. Part 3A of the EP & A Act and related *Environmental Planning & Assessment Regulations 2000*, sets out requirements for submission of applications, environmental assessment requirements, public review and consultation, and preparation of an assessment report, and determination.

Clause 8O of the EP & A Regulations prohibits approval of Concept Plans on sites which are not subject of an authorisation to submit a Concept Plan and are located in an "*environmentally sensitive area of State Significance*". Approval of a Concept Plan is NOT prohibited in this case because:

• On 20 March 2009 the Director General of the NSW Department of Planning authorised the submission of a Concept Plan for the subject proposal



• The subject site <u>does not</u> meet any of the criteria for "*environmentally sensitive area of State Significance*", as defined under the SEPP (Major Projects) 2005

The Minister for Planning is the consent authority for the subject proposal.

1.4 Report Structure

The aim of this report is to inform the Department and relevant stakeholders, of the scope of the proposal, and provide a succinct analysis of the key environmental and planning issues that are likely to be of relevance to its environmental assessment. The report is structured as follows:

Section 1 – Introduction – provides a background to the site, the proposal, and the approval regime for the proposal

Section 2 – The Project Description – provides a snapshot of the proposal for which approval is sought, including the "level" of approval, and the types of controls and guidelines that will shape future development

Section 3 – Review of Statutory Planning – the planning context and required approvals and the future planning approvals' regime that is sought for the site

Section 4 – Consultation – outlines the key government and stakeholders in the environmental assessment process

Section 5 – Environmental Impacts – identifies the key environmental issues arising from work to date, the nature of the proposal, and an analysis of the site circumstances

Section 6 – Conclusion & Summary of Findings

1.5 Proponent

The proponent of this application is ICPS Pty Ltd, with the consent of the landowner Afteron Ltd.



2 **Project Description**

2.1 Concept Plan

The objective of the proposal is to provide for a clear definition of developable limitations on the site, and establish an appropriate approval's regime that will facilitate its future development for employment purposes. Key elements of the Concept Plan are as follows:

Table 1: Ma	ajor components	of Concept Plan
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Aspect	Description
Project summary	Establishment of an employment precinct on 21.86 hectares, including creation of a statutory planning regime and design controls which facilitates future development of warehouses, distribution centres, light industrial and high technology uses, and ancillary office development, and provision of associated internal and external infrastructure; a signalised intersection with Wallgrove Road; and the dedication of ecologically significant conservation area(s)
Industrial development	Demolition of all existing structures on-site, and development of an employment precinct containing industrial and mixed industrial- commercial buildings with a maximum combined gross floor area of 105,000m ²
Land use regime	Permissible land uses consistent with the IN1 General Industrial zoning under the Standard Instrument – Principal Local Environmental Plan with the additional uses of <i>"Office premises (where ancillary to another use permissible in the zone)"</i> and <i>"Wholesale supplies"</i> .
Roadworks and internal roads	Upgrade of existing intersection with Wallgrove Road to provide for a signalised intersection providing for north and south-bound movements to and from the site. Where necessary, new internal roads will be dedicated as public roads.
Infrastructure	Potable, water, sewer, electricity, gas and telecommunications would be provided through connection to existing trunk services. On-site rainwater harvesting for non-potable uses on-site and/or off-site (where viable).
Capital investment	\$60 million
Employment	300 once developed
Hours of operation	24 hours / 7 days per week



2.1.1 Industrial Development

All buildings and current improvements onsite will be demolished.

At this early stage of analysis of site yield, a notional figure of 105,000m² gross floor area has been conservatively estimated based on:

- a total site area of 22 hectares (approx)
- less a reasonable proportion (15%) of the gross site area being unavailable for development
- a 50% site coverage yield
- approximately 15% of total floor space used for ancillary office purposes (office floorspace divided over two storeys).

With rounding this will provide for approximately 90,000m² of industrial floorspace and 15,000m² of ancillary office space. These figures provide for a robust analysis of the proposed intersection performance, and stormwater runoff impacts.

2.1.2 Land Use Proposal

The physical location of the site with regard to regional infrastructure, and the site topography, has the potential to provide for a landmark employment development, and potential needs to be provided for the prospect of an integrated office-industrial outcome. Further the prospect for high technology industries needs to be allowed for, and with it their relatively high office components. It is appropriate to specify clearly through land use controls, that ancillary office use is appropriate on this site and allowed for by the land use controls.

It is intended to enable the development for the following purposes on the site:

- Warehouse and distribution centres
- Light Industry
- Office premises (where ancillary to a use permissible in the zone)
- Depots
- Freight transport facilities
- Neighbourhood shops

2.1.3 Signalised intersection with Wallgrove Road

A key element of the commercial success of the precinct will be its potential to efficiently access the north and south bound lanes of Wallgrove Road (and hence access both directions of the M4 and M7 Westlink motorways). An analysis of existing traffic, and intersection performance under the scenario outlined above, will be provided within the environmental assessment. Approval is therefore sought for this intersection, such that no further planning assessment is required, and the intersection could be implemented at any time to attract prospective development on the site.

2.1.4 Infrastructure and servicing

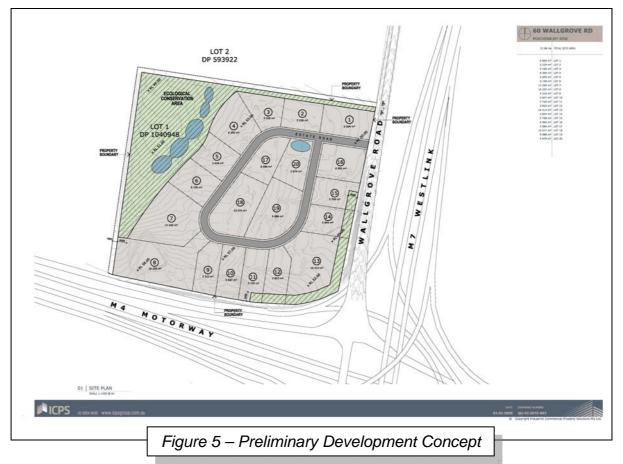
Existing infrastructure services to the site are insufficient to cater for its redevelopment. New connections to local key trunk infrastructure will be required. A report will be provided with the



environmental assessment detailing recommended measures to ensure the site is serviced. Furthermore the potential for rainwater capture and reuse on and off-site will be addressed.

2.1.5 Preliminary Site Planning and Development Concepts

Arising from site analysis and environmental assessments undertaken to date, ICPS in association with its consultants, has developed the following preliminary site development concept, based on a land subdivision scenario for the site. It does not however represent the final proposal, nor does it represent the final proposal for road layout or the size and area of the ecological conservation area, which is yet to be resolved and will be fully documented as part of the Environmental Assessment process.





2.2 Future Approvals Regime

Approval is sought for a Concept Plan accompanied by certain specific determinations, pursuant to section 75P of the EP & A Act, that:

- No further environmental assessment is required for the proposed intersection with Wallgrove Road, and subdivision to create developable and conservation areas on the site in accordance with the Concept Plan;
- roadworks, earthworks and trunk infrastructure reticulation within the site, are projects to which Part 3A of the EP & A Act will apply;
- construction of the buildings and the approval for use of land shall be subject to Part 4 of the EP & A Act (unless they are declared a Major Project by virtue of their size or nature); and
- the provisions of the Blacktown LEP 1988 or any other EPI that seeks to prohibit or restrict the development on the site in accordance with the Concept Plan approval, has no effect

2.3 Statement of Commitments

It is envisaged that the Concept Plan will be supported by the proponent's offer by way of a Statement of Commitments to fund or contribute to the provision of local and regional infrastructure as follows:

- Payment of 100% of the works associated to the signalised intersection with Wallgrove Road
- Payment of 100% of on-site roadworks and required infrastructure to Blacktown City Council and relevant authority standards
- Contributions to improving regional road and transport facilities to be determined in consultation with the RTA
- Other local infrastructure contributions as negotiated with Blacktown City Council, including but not limited to, biodiversity regeneration and maintenance programmes, or off-site infrastructure which is required to be upgraded as a result of the subject development



3 Review of Statutory Planning Requirements

Essentially there are 3 layers of environmental planning legislation that are pertinent to the subject proposal: Commonwealth, State and Local.

3.1 Commonwealth Environmental Planning

Actions that may significantly affect Matters of National Environmental Significance (MNES) require approval from the Department of Environment, Water Heritage and the Arts (DEWHA) under the *Environment Protection and Biodiversity Conservation Act 1999.* The EPBC Act lists several matters of NES which are considered in the table below:

MNES	Comment	
World Heritage Property	There are no World Heritage properties in the vicinity of the site.	
National Heritage Places	There are no National Heritage places in the vicinity of the site.	
Ramsar wetlands of international significance	There are no wetlands in vicinity of the site.	
Listed Threatened species and ecological communities	The proposal will involve an action affecting a listed Threatened Ecological Community, being Cumberland Plain Woodland (CPW)	
Listed Migratory species	There are no migratory species that have been found to use the site	
Nuclear actions	The proposal does not involve nuclear actions	
Commonwealth marine area	There are no Commonwealth Marine areas in the vicinity of the site.	

Table 2: EPBC Matters of National Environmental significance

Referral to DEWHA will be undertaken to address obligations with regard to the EPBC Act.



3.2 State Environmental Planning Legislation

Pursuant to Section 75I of the EP & A Act , the Director General is to consider the provisions of any:

- State environmental planning policy (SEPP) that substantially govern the carrying out of the project; and
- Environmental planning instrument that would (but for Part 3A) substantially govern the carrying out of the project and that have been taken into consideration in the environmental assessment of the project

The following State Environment Planning policies that are considered to substantially govern the carrying out of the project:

3.2.1 State Environmental Planning Policy (Infrastructure) 2007

Wallgrove Road is a classified road under the *Roads Act 1993.* **Schedule 3** of the SEPP requires referral to the RTA where development has access to a classified road and will exceed $5,000m^2$ is for industrial floor space greater than $5,000m^2$.

Consultation with the RTA is also warranted given the proposal for new traffic lights on Wallgrove Road.

3.2.2 Draft State Environmental Planning Policy (Western Sydney Employment Hub) 2008

This draft SEPP was exhibited between 19 March to 28 April 2008.

Part 2 of the draft SEPP outlines permitted or prohibited development on land affected by the SEPP. The permissible land uses to be authorised by the Concept Plan is consistent with the IN1 zoning proposed under this draft SEPP.

Part 3 of the draft SEPP is not relevant to this proposal.

Part 4 of the draft SEPP requires that a DCP must be prepared for the land prior to the granting of consent. It is considered that the Concept Plan process effectively addresses this requirement and will demonstrate an appropriate environmental assessment of the site, and establish suitable development guidelines for future development of the site. The proposed environmental assessment and Concept Plan will satisfy the intent and requirements of Part 4 of the draft SEPP.

Part 5 of the draft SEPP refers to Design, Sustainability, Height, Rainwater Harvesting, Considerations of orderly land development, relationships to nearby residential land, and the provision of public utility infrastructure. The environmental assessment will address all of these matters, and the Concept Plan will provide a logical method to address environmental impacts and the establishment of development guidelines.

Part 6 of the draft SEPP is not relevant to this proposal.

It is noted that pursuant to **Clause 8(2)** of the draft SEPP, it is intended that the provisions of the Blacktown LEP 1988 would not apply to the site.



Clause 30 of the draft SEPP requires that approval may only be given for development where arrangements have been made to contribute to the provision of regional transport infrastructure and services. It is contemplated that consultation with, and an "offer" to, the RTA during the environmental assessment process will address this matter.

3.2.3 State Environmental Planning Policy No. 55 – Remediation of Land

The site has been successively used and occupied since the 19th century for rural, agricultural, Army training camp, migrant hostel, and plant and animal quarantine station purposes. **Clause 7** of this SEPP would require the reporting and consideration of the contaminated status of the land, and whether the land requires remediation prior to its proposed use. It is intended that a Stage 1 Environmental Site Assessment be undertaken in accordance with relevant EPA guidelines, including a review of previous reports, as well as identification of potentially contaminating activities currently evident. This report would be included with the environmental assessment, it will address the requirements of SEPP 55, and will enable the Director General to ensure the site is suitable for intended use.

3.2.4 Sydney Regional Environmental Plan No. 20 – Hawkesbury Nepean River

This plan insofar as it relates to the site, refers to requirement to consider water quality, water quantity and erosion and sediment controls. The site is situated approximately 650 metres to the west of Eastern Creek, and the intervening land between the site and Eastern Creek is dominated by the M7 Westlink, Wallgrove Road, rural residential properties, and Pinegrove Lawn Cemetery.

Preliminary advice from the Water Management Division of the Department of Water and Energy (reference ERM 2009/0160) is that there are 2 watercourses on the site which are both "Category 3", however neither are considered to be of environmental importance due to:

- recent site disturbance (ie the eastern watercourse) and
- the source of the western watercourse is an artificial settling pond with no natural catchment.

DWE has advised ICPS that it has no interest in maintaining the current watercourses on-site, and DWE's interest will focus upon sediment and erosion control. It is also envisaged that on-site quantity and quality control will be implemented in the development, and that water sensitive urban design, and water reuse will be a feature of the proposal in accordance with current best practice. The conceptual hydraulic models, treatment proposals, and reuse principles will be documented in the environmental assessment and Concept Plan documentation.



3.3 Local Environmental Planning

3.3.1 Blacktown Local Environmental Plan 1988

The Blacktown LEP zones the site "5(a) Special Uses – Commonwealth Uses". Pursuant to clause 9 of the LEP the proposed uses envisaged by the Concept Plan are prohibited. Given the private ownership of the land, its identification within the Western Sydney Employment Hub, and upon AQIS vacating the site, the purpose of this zoning and its objectives are redundant.

The site is not identified as a Heritage Item within Schedule 2 of the Blacktown LEP, nor are there any other provisions of this LEP of significance to the proposal.

3.4 Other Approvals

3.4.1 Threatened Species Conservation Act

Preliminary flora studies of the site reveal the presence of an endangered ecological community (Cumberland Plain Woodland) on the site, albeit in fragmented portions which are not contiguous with off-site vegetation. While it may be found that certain groupings of this vegetation on-site are able to be removed, or require removal to enable the efficient development of the site, removal of such vegetation will require appropriate assessment, consultation and agreement with the Department of Environment and Climate Change (DECC) and Blacktown City Council as to the exact extent of removal.

3.4.2 National Parks & Wildlife Act 1974

Preliminary Aboriginal Archaeological studies of the site have revealed existing 6 surface artefacts artefacts, and concludes that there is potential for further sub-surface artefacts. However the conclusion of the study reveals that the identified or potential artefacts on the site are not so significant as to pose a constraint to development of the site on archaeological and Indigenous heritage grounds.

A report detailing consultation with Aboriginal groups, site survey and analysis of the site, will be submitted with the environmental assessment, and satisfy contemporary guidelines regarding Aboriginal community involvement. It is envisaged that given the findings of that report, it will be recommended that an Aboriginal Heritage Management Plan will be included as a condition of approval for the Concept Plan, and that such AHMP would warrant approval of NPWS in the form of a "whole of development" section 87/90 permit.



4 **Consultation**

ICPS and its consultants intend to specifically consult with following during the environmental assessment process:

- Roads & Traffic Authority of NSW
- Department of Environment and Climate Change
- National Parks and Wildlife Service
- Adjoining landowners (Invocare Pty Ltd)
- Blacktown City Council
- Department of Water and Energy
- Local Indigenous Community Representatives

Where it is found that further relevant agencies and stakeholders are identified during the preparation of the environmental assessment, consultation would be undertaken accordingly.

5 Environmental Impacts

5.1 Summary Analysis of Environmental Impacts

The following summary is intended to clarify the anticipated scope of environmental impacts and issues relevant to the assessment of the proposed Concept Plan.

Issue	Analysis/Comment
Soil & Water	The site contains gently sloping land (generally between 0.8% - 2.8%). It does not adjoin any watercourse of significance, nor is geological profile such that hazards or unusually erosion prone soils are likely to occur on-site. In this context there it is appropriate to consider that the matter of soil and water erosion that may occur during construction processes, can be addressed at future project/development applications stage.
Noise	The permissible uses sought on the site envisage 24 hour 7 days per week operations. The nearest "sensitive receivers" are residential properties in excess of 260 metres from the northern site boundary and 550 metres from the western site boundary. An acoustic report will be prepared to ascertain baseline conditions, review appropriate



	Noise guidelines (such as the DECC Industrial Noise Policy) and recommend appropriate noise generation thresholds for future development on the site, including construction noise.
	At the Concept Plan level such advice will be used to inform the proposed Design Guidelines to orient or shield where required, noisy activities away from the general direction of sensitive receivers. A key conclusion of the report will be the establishment of threshold noise standards which will demonstrate compliance with noise guidelines, in future project/development applications.
Air Quality	Without the benefit of specific development proposals, it is envisaged that the principal source of air quality impacts will arise from vehicle emissions. Regionally there is merit in locating traffic generating development at strategic points in the metropolitan arterial road network where vehicle emissions are moderated through efficient vehicle operation, vehicle kilometres travelled (VKTs) and conflicts in land use are minimised.
	Given the fact it is unlikely that on-site development that involves significant air emissions is unlikely given recent industrial experience in Eastern Creek and Erskine Park, and Huntingwood, no specific air quality study is considered warranted or appropriate at the Concept Plan level. Future project/development applications can make provision for air quality impact assessment where those proposals warrant such studies.
Flora and Fauna	The current Quarantine Station use of the site includes noted areas of bushland within its boundaries. These include the endangered ecological community Cumberland Plain Woodland which has regrown on site since the 1940s.
	At a Concept Plan level, the Environmental Assessment will incorporate a Threatened species (flora and fauna) assessment, including identification of any endangered ecological communities on- site, an assessment of their circumstances and significance, and recommendations for incorporation into the development.
Aboriginal Heritage	Within the Employment Hub this site is one that is unusual in that it is not currently used for rural purposes nor an extractive industry. Notwithstanding the current site use is a relatively low density one, with minimal earthworks and there are "unused" areas on the subject site. These facts warrant a review and report into the archaeological potential of the site. It is intended to submit with the Environmental Assessment a report into Indigenous Heritage which incorporates fieldwork and consultation with local Indigenous communities, and recommendations regarding constraints and on-site management.
European Heritage	The site physically contains no significant items of European heritage, yet it is known to have a history of successive defined "stages" since is occupation in the 1800s. To date no evidence has arisen of any significant colonial rural occupation or construction on the site, however the site is known to have been formerly part of the Wallgrove



	Army Camp. Accordingly it is intended to submit with the Environmental Assessment a report into the heritage values applicable to the site, which will ultimately include any constraints to development or ongoing cultural heritage value the site may retain, and appropriate management recommendations.
Traffic and Transport	The sits has direct access to Wallgrove Road and adjoins the Interchange at the intersection of the M4 and M7 Westlink Motorways. Maintaining multi-directional access to Wallgrove Road will warrant the provision of traffic lights. It is intended that a survey of traffic volumes, expected generation rates using RTA guidelines, and modelling of the proposed intersection performance will be undertaken, in addition to any on-site road planning. Suitable parking rates based on RTA guidelines, will be proposed as a key development guideline. A key element of the proposal is the proposed signalising of the existing intersection, and adoption of certain on-site parking rates that reflect contemporary experience and practice.
Infrastructure and Services	Infrastructure services to the site (potable water, wastewater, electricity, gas and telecommunications) will need to be provided or augmented to enable its development for employment purposes. It is intended that a review of current and required infrastructure services is undertaken and submitted with the Environmental Assessment. The estate development guidelines will provide for on-site water capture, and may, depending on negotiations with the adjoining cemetery, result in the off-site capture and reuse of runoff by that user.
Visual amenity	The urban design report to be prepared with the Environmental Assessment will include a visual site analysis. This report will incorporate analysis and recommendations for appropriate massing and height guidelines based on visual amenity and impacts.
Hazards	The proposed Concept Plan does not presume any hazardous or offensive development. In fact the range of permissible land uses excludes Offensive or Hazardous Industry and storage establishments. Where issues of potential hazards are relevant to future project/development applications, it is recommended that at those times, relevant Preliminary Hazard Assessments are undertaken in accordance with SEPP 33.
Greenhouse Gas emissions	This proposal is for the establishment of the Concept Plan "envelope" controls over the site. Without the benefit of specific building proposals it is considered premature to speculate or establish numeric energy efficiency targets or mandate specific technological outcomes for future development. Rather it is appropriate that future project/development applications demonstrate energy consumption minimisation through building design and specific measures



appropriate to those uses and proposals. To provide a basis for future assessments of such proposals however, it is intended however to include with the Environmental Assessment a review of current best practice sustainability measures for larger employment buildings as a intention for what may be possible or likely on this site.
The proposal is for a Concept Plan that in itself does not envisage any unreasonable waste streams. It is recommended however that suitable details of waste management, in accordance with local planning policy (eg Blacktown DCP 2005) and Sydney Water requirements (ie trade waste permits), are addressed in conjunction with future project/development applications on the site.

5.2 Commitments

It is intended that the proposed Concept Plan is supported by a Statement of Commitments which will include the following:

- Negotiate and execute a Voluntary Planning Agreement (VPA) with the RTA regarding contributions towards the provision and augmentation of regional transport infrastructure
- Construction of a new signalised intersection with Wallgrove Road
- Negotiate and execute a Voluntary Planning Agreement (VPA) with Blacktown City Council to address reasonable contributions towards Council provided infrastructure and services
- Implementation of reasonable and appropriate environmental measures to minimise emissions of noise, dust, erosion, waste, from construction of the traffic lights



6 Conclusion & Summary of Findings

The purpose of this report has been to provide the Department with an appropriate understanding and detail of the relevant environmental and statutory planning issues associated with the proposal. Pursuant to section 75F of the EP & A Act 1979 the Director General of the Department of Planning is required to notify the proponent of the scope of "Environmental Assessment Requirements" for the application. It is anticipated that such requirements will refer to various technical guidelines and standards for environmental assessment, in addition to specifying requirements particularly framed for the subject proposal.

It is the proponent's intention that the Concept Plan will establish land use controls, a complete environmental assessment of constraints and impacts warranted for a Concept Plan, and establish key development guidelines to provide a yardstick for future project/development applications to adhere to.

The proposal is consistent with State Government metropolitan strategies, sub-regional planning, and the *Employment Lands for Sydney Action Plan*. As a Concept Plan it will provide an appropriate vehicle to establishing the "envelope" controls that will guide and apply to future developments upon the site which will contribute to job growth and the economic development of Western Sydney.