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URBIS

1-3 BURROWS ROAD, ST PETERS

SSD-35962232
Submissions Report

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Report Number V2



Acknowledgement of Country

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We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years.

We pay our respects to First Nations Elders, past and present.

The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

Title: Sacred River Dreaming
Artist Hayley Pigram
Darug Nation
Sydney, NSW

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1. INTRODUCTION

This Submissions Report relates to the proposed warehouse and distribution centre development at 1-3 Burrows Road, St Peters (**the site**). Prepared on behalf of Goodman Property Services (Australia) Pty Ltd (Goodman) (**the Applicant**), the report responds to matters raised by public agencies and other relevant stakeholders during the most recent public exhibition period.

Background

The proposal builds on Planning Proposal PP-2020-298, approved in September 2020, which increased the site's maximum building height under the *Sydney Local Environmental Plan 2012* from 18 to 30 metres and introduced site-specific controls, including a 6-metre landscaped setback to Burrows Road and Canal Road.

A Competitive Design Process was held in early 2022, resulting in the selection of Welsh + Major's scheme as the winning design. This scheme formed the basis of the original SSD application.

SSD-35962232

State Significant Development application SSD-35962232 was originally lodged with the then Department of Planning and Environment (DPE) in November 2022, with public exhibition undertaken from 18 November to 15 December 2022. A range of submissions were received and addressed in a comprehensive Submissions Report dated 27 April 2023.

Change in Direction

Between February and July 2023, Goodman undertook a 20-week Early Contractor Involvement (ECI) process to assess construction feasibility. This process identified escalating costs and increased complexity, particularly in relation to ramp design and structural methodology, which prompted a change in project direction, most notably, a reduction from three to two storeys.

Following design refinement and market engagement, Goodman consulted with the City of Sydney, the Department of Planning, Housing and Infrastructure (DPHI), and the Design Integrity Panel (DIP). Formal advice was received from the City of Sydney on 26 September 2023, outlining its expectations regarding 'design integrity'. This included ensuring that any amendments to the scheme continued to reflect the core design principles and high-quality architectural outcomes established through the original competitive design process.

In response, Welsh + Major were retained to lead the revised design and demonstrate that the updated scheme remained substantially the same as the competition-winning concept.

The DIP subsequently reviewed the revised scheme twice (on 26 February and 5 August 2024), confirming the updated design retained the integrity of the original competition-winning concept. The DIP also confirmed the revised two-storey scheme was 'substantially the same' as the original, supporting its progression via an amendment pathway.

Amended Proposal

A formal amendment request under Section 37 was submitted to DPHI on 9 October 2024. The amended proposal continues to exceed the State Significant Development cost threshold and relies on the originally issued SEARs.

Following DPHI's acceptance of the amended proposal, the Amendment Report, reflecting the revised two-level scheme, was publicly exhibited for 28 days, from 11 February to 10 March 2025.

This Submissions Report has been prepared in accordance with the *State Significant Development Guidelines – Preparing a Submissions Report*, and addresses the key issues raised during the latest public exhibition period.

1.1. EXHIBITED PROJECT

The Amendment Report seeks consent for:

- Demolition of all existing structures and buildings on site.
- Tree removal both on site and for a limited number of trees in the public domain and adjoining lot.
- Site remediation, and establishment works, including minor excavation / bulk earthworks.
- Design, construction and operation of a two-storey warehouse and distribution centre building with ancillary offices for each warehouse tenancy, including:
 - Approximately 34,051sqm of total GFA, comprising:
 - 30,389sqm of warehouse and distribution centre GFA.
 - 3,353sqm of GFA for ancillary office space; and
 - End of Trip Facilities on the ground floor of 309 sqm GFA.
 - Maximum building height of RL 29.70 (maximum 25m from existing ground level).
 - Operation 24 hours per day seven days a week.
- Provision of on grade car parking accessed off Burrows Road which provides 145 tenant and visitor car parking spaces (including 8 accessible bays), 14 motorcycle spaces, and bicycle parking and end-of-trip facilities (including 66 bicycle parking spaces, showers, lockers and change rooms for occupants).
- New crossings to Burrows Road for truck and car access.
- Single fire and utilities services ingress crossing off Canal Road.
- Site landscaping works totalling approximately 6,856sqm (or 19.8% of the site), including
 - Two x 6-metre landscaped setback areas to both the Burrows Road and Canal Road site frontages.
 - 3,829sqm or 11% deep soil landscaping.
 - 3,027sqm or 8.7% of permeable paving; and
 - 5,450sqm or 15.7% tree canopy coverage
- Provision of building / business identification and wayfinding signage.

Figure 1 Photomontage of Amended Proposal – view along Burrows Road from the north



Source: Welsh + Major

1.2. SUPPORTING DOCUMENTATION

This Submissions Report is supported by the following technical reports and documentation.

Table 1 Supporting Documentation

Appendix	Report	Prepared By
Appendix A	Revised Architectural Plans	Welsh + Major and SBA
Appendix B	Architectural Design Response Letter	Welsh + Major
Appendix C	Revised Landscape Plans	Taylor Brammer
Appendix D	Revised Traffic Report	Ason Group
Appendix E	Revised Civil Engineering Plans	Costin Roe
Appendix F	Revised Flood Report	Costine Roe
Appendix G	TfNSW Landowners Consent dated 20 May 2025	TfNSW

2. ANALYSIS OF SUBMISSIONS

The Amendment Report was publicly exhibited between 11 February 2025 and 10 March 2025. There were 12 submissions received from public agencies, including one from the City of Sydney Council. DPHI also provided separate written advice. No submissions were received from special interest groups or members of the local community.

All submissions were managed by DPHI, who registered and uploaded the submissions onto the 'Major Projects Portal' (SSD-35962232).

Overall, 13 submissions were received, which made 'comment' on the project. Responses to each submission are included in Section 4. Thematically, the key issues raised in the submissions included:

- Flooding.
- Access and Transport.
- Tree Management.
- Urban Design, Public Domain, Public Art and Landscaping.
- Use of Outdated Reports and Data.
- Recommendations for conditions related to noise, contamination, infrastructure and access.

3. ACTIONS TAKEN SINCE EXHIBITION

In response to the key issues raised within the submissions, minor design refinements and clarifications have been made to the proposed development since public exhibition.

This section summarises the changes that have been made to the project since its public exhibition. It also outlines the additional assessment undertaken to respond to the concerns raised with the public agency, organisation and public submissions outlined in **Section 2**.

3.1. FURTHER ENGAGEMENT

Since the public exhibition of the Amendment Report between 11 February 2025 to 10 March 2025, the Applicant has undertaken further consultation with DPHI via teleconference on Friday 28 March 2025. The purpose of this meeting was to review the submissions received and identify any threshold issues that may affect the determination of the application. Feedback from this session has been incorporated into this Submissions Report.

3.2. REFINEMENTS TO THE PROJECT

Since public exhibition, minor design refinements have been made to improve site functionality and safety and respond to submissions, including:

- Reduction in the width of both truck driveways on Burrows Road, following updated swept path analysis.
- Removal of a traffic island at the northern driveway to reduce pedestrian crossing distances and improve access legibility.
- A car parking space adjacent to the northern End of Trip Facilities has been converted to accommodate bicycle parking for eight visitor bicycles, accessible to the public and close to the building entrance.
- A car parking space adjacent to the southern End of Trip Facilities has been converted to accommodate bicycle parking for five visitor bicycles, accessible to the public and close to the building entrance.
- Car parking bay numbers have been reduced by 2 spaces (see below).

Table 2 Revised Parking Calculations

Parking	Previous (exhibited)	Current (amended)
General Car	145	143
Accessible	8 (including above)	8 (including above)
Motorbike	14	14
Bicycle (EOTF / internal)	66	66
Bicycle (visitor / external)	0	13

3.3. ADDITIONAL IMPACT ASSESSMENT

Additional assessments have been prepared to respond to the issues raised within the submissions.

3.3.1. Architectural and Landscape Design

In response to issues raised by the City of Sydney and other stakeholders during the exhibition of the amended proposal, additional clarifications and minor amendments have been made to address specific concerns.

These updates have been incorporated into the amended architectural plans prepared by SBA Architects and the revised landscape documentation prepared by Taylor Brammer. Further detail is provided in the Architectural Design Response Letter prepared by Welsh + Major (Appendix B).

3.3.1.1. Design Clarifications

Following the Design Integrity Panel (DIP) session on 5 August 2024 and their subsequent advice dated 12 August 2024, two key elements were identified as requiring further refinement and resolution: the interlocking corners and the capping detail.

Additional clarification is provided below in response:

Interlocking Corners

The northeast, southeast, and southwest corners of the building incorporate flared cladding elements designed to create a greater depth of shadow at the steps in the façade and accentuates the cladding layers. These flares enhance the visual layering of the cladding system and provide a sculptural treatment to key building corners.

The DIP acknowledged that further refinement of these features would be required to ensure constructability and waterproofing. In response, the design has been resolved to include an inner waterproof skin below the flared elements where necessary.

At the northeast corner, the flared corner is constructed from perforated metal cladding and is positioned in front of the office-level garden terrace. In these areas, the waterproof office enclosure is set back behind the garden terrace, with the perforated cladding serving as a screen that allows for both views and airflow.

On the Ground Level Mezzanine of the southeast and southwest corners, the flared corners occur at a high level above the undercroft parking area. In these areas, waterproofing is not required due to their open-air nature.

All layering and interface details have been illustrated in the updated architectural drawings.

Capping Detail

The DIP also noted that the fine-edged capping at the parapet would continue to be refined during the detailed design phase. This parapet capping is conceived as a simple folded metal capping similar to precedents such as the Castle Hill Powerhouse by Lahznimmo Architects. The capping detail will be detailed to balance robust waterproofing and a fine expression during the construction documentation stage.

3.3.1.2. Landscape Design and Connecting with Country

The revised (exhibited) landscape strategy retains the key design intent of the competition-winning scheme, including elements reflecting 'Connecting with Country' principles.

While the rooftop garden from the original scheme has been removed, the revised proposal introduces garden terraces adjacent to all office levels, offering enhanced visual amenity from both within and outside the building, and providing easier access for workers and visitors

The updated landscape design continues to reflect the 'Coast to Gully' narrative developed in consultation with Yerrabingin and First Nations representatives. Indigenous planting, curved building forms, and human-scale spaces remain integral to the proposal's landscape character.

Public domain enhancements along Burrows Road include new seating and landscaped edges, consistent with the previous iteration of the scheme (refer to Drawings LA202 and LA203).

In response to Council requests, the design team has clarified the intent of the 900mm high mobile planters that define the garden terrace edges. These planters are intended to provide a raised green edge to the garden terraces that allows foliage to spill over the outer edge of the façade and be visible from the external areas of the site and the public domain.

The mobile planters are proposed to be a 900mm high precast GRC planter, non-climbable to maintain balustrade safety, and movable in the event of programmed maintenance activities. Further detail on these planters is provided in Drawing LA504.

3.3.1.3. Access, Driveways and Bicycle Parking

Updates have also been made to improve site access and bicycle facilities in line with feedback from the City of Sydney and other agencies. Changes reflected in Drawing DA200 Rev 11 include:

- The northern truck driveway on Burrows Road has been narrowed and a pedestrian traffic island removed to enhance legibility and pedestrian safety.
- Two visitor bicycle parking areas have been added, eight spaces in the northern car park and five spaces in the southern car park, by repurposing two car bays. These locations provide convenient, publicly accessible bike parking near building entries.
- As a result of the bicycle parking additions, the total number of car spaces has been reduced from 145 to 143, with all other parking provisions (accessible, motorcycle, EOTF bicycle storage) unchanged.

These architectural and landscape amendments demonstrate the continued commitment to design quality, while directly responding to feedback from the City of Sydney, the DIP, and other agencies.

3.3.2. Traffic, Transport and Accessibility

A revised Transport Management and Accessibility Plan (TMAP) has been prepared to support the amended proposal and respond to matters raised during the most recent public exhibition period. The TMAP confirms that the proposed development, comprising 34,051sqm of gross floor area (including 30,389sqm of warehouse space and 3,353sqm of ancillary office space), is appropriate from a traffic planning perspective and will not result in adverse impacts on the surrounding road network.

The Site benefits from good access to public transport and active transport networks, located approximately 1 kilometre from Mascot Train Station and serviced by multiple bus routes (348, 358 and 422). Pedestrian amenity in the surrounding area is generally high, with wide footpaths and signalised crossings, and the site is well-connected to the broader cycle network via existing on and off-road bicycle routes.

Vehicular access to the site is proposed via three crossovers on Burrows Road, comprising one for cars and two for trucks. A fourth crossover is provided on Canal Road for emergency vehicle access only.

Since public exhibition, minor design refinements have been made to improve site functionality and safety, including:

- Reduction in the width of both truck driveways on Burrows Road, following updated swept path analysis;
- Removal of a traffic island at the northern driveway to reduce pedestrian crossing distances and improve access legibility; and
- Relocation of visitor bicycle parking spaces to more prominent, publicly accessible areas near building entrances, consistent with Council's DCP requirements.

The development proposes a total of 143 car parking spaces, including 8 accessible spaces, in compliance with the maximum rates permitted under the Sydney LEP 2012. End-of-trip facilities and 66 bicycle spaces are also proposed on the ground floor.

SIDRA modelling confirms that the majority of surrounding intersections will continue to operate at acceptable levels of service (LoS D or better) under future conditions. Two intersections, Gardeners Road / O’Riordan Street (PM peak) and Princes Highway / Campbell Road (AM peak), are expected to operate at LoS F irrespective of the development. Importantly, the current proposal represents a 35% reduction in gross floor area compared to the original scheme and is therefore expected to generate significantly lower traffic volumes than those modelled previously. As such, the modelling adopted in the TMAP is conservative.

Traffic generation during the AM and PM peaks is forecast at 108 and 102 vehicle trips respectively, with a mix of light vehicles, rigid trucks, and articulated vehicles. These volumes are not expected to materially impact the performance of surrounding intersections, with Levels of Service (LoS) and Degrees of Saturation (DoS) remaining unchanged between the 2031 base and project case scenarios.

Vehicle access, car parking and internal circulation arrangements have been designed in accordance with Australian Standards (AS2890 series). Any required refinements can be addressed through the Construction Certificate process. A Preliminary Construction Traffic Management Plan (CTMP) has also been prepared and confirms that anticipated construction traffic volumes are lower than those assessed in earlier traffic modelling. On this basis, no additional upgrades to the surrounding road network are considered necessary.

Finally, a Green Travel Plan has been prepared outlining sustainable travel initiatives and guiding principles for future tenant-specific travel plans.

In summary, the proposed development is supportable on traffic, transport and accessibility grounds. The revised TMAP, coupled with the post-exhibition design refinements, confirm that the project will not generate adverse impacts on the local road network or pedestrian environment.

3.3.3. Flooding Risk

A revised Flood Impact and Risk Assessment (FIRA) has been prepared by Costin Roe Consulting (CRC) to support the amended proposal and respond to matters raised during the public exhibition period, including detailed feedback from the City of Sydney, Inner West Council, and the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) – Conservation Programs, Heritage and Regulation (CPHR) Group. The assessment adopts the principles and methodology of the NSW Floodplain Development Manual (2005), Guideline LU01, EM01, and the Shelter-in-Place Guideline for Flash Flooding (2024), and incorporates updated hydrologic and hydraulic modelling using the TUFLOW platform.

The revised flood modelling has been informed by topographic survey, local and regional drainage data, and relevant flood studies, including:

- Alexandra Canal Model Conversion (City of Sydney, 2020),
- Alexandra Canal Flood Study (Inner West Council, 2017),
- Alexandra Canal Flood Risk Management Study and Plan (Inner West Council, 2024), and
- St Peters Interchange Flood Study (TfNSW, Lyall & Associates).

The model has been updated in response to agency and council feedback to include revised catchment boundaries, an extended model domain, adjusted tailwater conditions, and revised roughness values (including an updated Manning’s ‘n’ coefficient of 0.03 for Alexandra Canal). The model simulates the 50%, 20%, 5%, 1%, 0.5%, 0.2% AEP and PMF events, including sensitivity testing for climate change effects.

The updated modelling confirms that the proposed development will not result in adverse flooding impacts on adjoining properties or the broader catchment. Key findings include:

- No increases in peak flood levels greater than 0.01 m on any adjacent land in the 1% AEP event;
- Negligible velocity changes (± 0.25 m/s) across Canal and Burrows Roads;
- No unacceptable loss of flood storage, as the mapped “storage area” is in fact part of the site’s drained sunken dock system with independent outflow capacity;

- No interruption to overland flow paths, with conveyance maintained through and around the site; and
- All finished floor levels are set above the applicable Flood Planning Level (FPL), with the warehouse slab at RL 4.7 m AHD (i.e. >1.7 m above the 1% AEP) and fire egress at RL 3.5 m AHD.

The need for on-site detention (OSD) has been assessed in consultation with Sydney Water and is not required for the development. This is due to the site's discharge to a tidally influenced waterbody (Alexandra Canal), its location at the downstream end of the catchment, and the fully developed nature of the existing site. Inclusion of OSD in this context would not materially reduce downstream flooding and could, in fact, result in adverse timing effects during larger catchment-scale events.

With respect to flood emergency management, the CRC report includes a preliminary assessment that confirms safe evacuation can be achieved up to the 0.2% AEP event, with the building remaining flood-free under the PMF. While early evacuation is the preferred strategy, shelter-in-place provisions have also been addressed and will form part of a detailed Emergency Management Plan to be prepared post-approval. This plan will be secured through a condition of consent and developed in accordance with the requirements of EM01 and the NSW SES.

In summary, the revised flood modelling and supporting technical assessment confirm that the proposal is acceptable from a flooding perspective and complies with all applicable planning and engineering standards. No off-site mitigation works are required.

The findings and recommendation of the additional assessments are discussed in detail within **Section 4** of this report.

4. DETAILED RESPONSE TO SUBMISSIONS

This section provides a detailed summary of the Applicant's response to the issues raised in submissions. Since only a small number of submissions were received during the public exhibition process, a response to each individual submission is included in the table below.

Table 3 Detailed Response to Submissions

Issue Raised	Response
City of Sydney	
<p>1. Urban Design The Amendment Report accompanying this proposal refers to final DIP advice dated 5 August 2024.</p> <p>It is recommended that the amended submission be assessed against the August DIP advice, considering whether the scheme has now appropriately addressed the design refinement and resolution of:</p> <ul style="list-style-type: none"> ▪ The interlocking edges of the façade at the corner of Burrows and Canal Roads and the north-east corner of the site; and ▪ Capping detail of the sharp edge roof. <p>We also request that all external materials be fully described on the elevations, sections and on a materials and finishes board. The details must include specific product information where relevant, including manufacturer’s detail, material type, finish and colour and avoid using the term “or similar”.</p> <p>This includes (but is not limited to):</p> <ul style="list-style-type: none"> ▪ Actual manufacturer’s product finishes for all proposed external materials. The concrete is to have a minimum class 2 finish. The size of the perforations in the perforated cladding is to be specified. ▪ The profile of the milled aluminium is to be specified. This is needed to understand whether the texture will be legible from a distance and at a large scale. ▪ The window frame material and finish. ▪ Glazing type, including transparency. ▪ The entry canopy material and finish. ▪ Any solar screen elements are to be specified. ▪ The colours of undercroft and entry lobby feature column bases are to be detailed. No generic colours are to be provided. 	<p>Interlocking Corners These comments from the DIP reflect discussions during the review regarding the constructability and waterproofing of the flared corners that occur at the northeast, southeast and southwest corners. The flared expression of these key corners is designed to create a greater depth of shadow at the steps in the façade and accentuates the cladding layers.</p> <p>The cladding detail at the corners has been suitably resolved at SSDA stage so as to enable an inner skin of waterproof cladding to continue below the flares and close the corner of the building where required for waterproofing. The flared layer of cladding sits over this waterproofing layer as a purely expressive detail.</p> <p>At the northeast corner on the Ground Level Mezzanine and Level 1 Mezzanine, the flared corner is constructed of perforated metal cladding and are located in front of the office level garden terrace. In these areas the waterproof enclosure of the offices is set back behind the garden terrace with the perforated cladding proving a screen that allows for views and airflow.</p> <p>On the Ground Level Mezzanine of the southeast and southwest corners, the flared corners occur at a high level above the undercroft parking area. In these areas the inner layer of waterproof cladding is not required as the carparking area below is an outdoor undercover area.</p> <p>These inner and out layers of cladding are indicated on the architectural plans of each level.</p> <p>Capping Detail These comments from the DIP reflect discussions during the review regarding the parapet capping detail. This fine edged capping runs the full extent of the building at the top edge of the metal parapet and is proposed as a simple folded metal capping similar to the simple cladding at the Castle Hill Powerhouse by Lahznimmo Architects (refer to Design Response Letter for image). The capping detail will be refined during construction detailing to ensure robust waterproofing and a fine expression.</p>

Issue Raised	Response
	<p>External Materials We acknowledge Council's request for fully detailed external material specifications at the SSDA (pre-construction) stage, including product-specific information, manufacturer details, profiles, colours, and finishes.</p> <p>We respectfully submit that this level of prescription is not appropriate or necessary at this stage of the process. The SSDA, as submitted to DPHI, includes detailed architectural documentation that clearly conveys the architectural intent, proposed material palette, and visual character of the proposal. This information provides an appropriate and sufficient basis for assessment at SSDA stage.</p> <p>The request to nominate actual manufacturers, exact product types, and prohibit use of terms such as "or similar" imposes an inflexible and overly prescriptive approach. It seeks to resolve construction-level detail before design development and procurement processes have occurred, which is neither practical nor standard industry practice. Importantly, this approach constrains the design team's ability to adapt to product availability and material performance considerations as the project advances.</p> <p>Given the scale and complexity of the project, and its status as a State Significant Development, we consider the level of detail already provided to be entirely appropriate. We respectfully request that DPHI not impose this requirement as a condition of consent.</p>
<p>2. Landscape The proposal previously provided 12.6% deep soil (4,378sqm), which has now been reduced to 11% (3,820sqm). Landscaped area has reduced from 19.5% (6,772sqm) of the site to 11% (3,820sqm).</p> <p>Design elements that were strongly supported and recommended to be retained in the design competition by the Selection Panel, such as the connecting to country outcome with link to wetlands and through landscape (i.e. pond / water feature to office space, bioswales etc); and the office roof garden / terrace being an amenity component have not been carried through as part of the amended proposal. A number of landscape elements have also been removed from the scope, including green roof and WSUD raingardens, and seating areas along Burrows Road.</p> <p>It is recommended that opportunities to increase the provision of landscaped areas are considered in order for the proposal to continue to exhibit landscape design excellence.</p>	<p>We acknowledge Council's comments regarding the reduction in deep soil and landscaped area compared with the original submission. We note that Council's statement indicating 11% deep soil provision is incorrect, as it does not account for the permeable area, 50% of which contributes to the overall deep soil calculation.</p> <p>In addition, we note that the amended proposal continues to comply with the relevant planning controls in relation to deep soil planting (15% requirement; 15.4% achieved) and tree canopy cover (15% requirement; 15% achieved per Landscape Plan LA212), as outlined in the Sydney DCP 2012.</p> <p>While the quantum of landscape area has been refined, the proposal continues to support a high-quality landscape outcome that aligns with the functional requirements of the site, the design intent endorsed through the competitive process, and the operational needs of the end users.</p>

Issue Raised	Response
<p>Further clarity is also requested of the proposed 900mm mobile planters along the edge of the proposed terraces. Landscape and architecture sections do not adequately communicate the intent of these elements.</p>	<p>City of Sydney comments make reference to landscape design elements noted in the original Design Competition scheme, being the Connecting with Country outcomes, and the office roof garden / terrace. The key principals of these design elements have been retained in the current proposal as follows:</p> <ul style="list-style-type: none"> • The key Connecting with Country principles, including the interpretation of the former wetland shoreline through curved building forms, indigenous planting, and a focus on human-scale spaces that support care for Country continue to underpin the proposal. The updated narrative of 'Coast to Gully' has been developed through further consultation with Yerrabingin and First Nations representatives to provide a further layer of connecting with Country. • The updated proposal incorporates garden terraces immediately adjacent to each level of office accommodation to provide a significant amenity component. Rather than being concentrated on the rooftop terrace as in the previous proposal, these landscape terraces are equitably distributed around the building to have a greater amenity impact both visually from inside and outside the building, as well as being more easily accessible to workers and visitors. • We also note that seating areas along Burrows Rd in both the southern and northern sections of the street frontage have been carried through in the amended proposal (refer drawings LA202 and LA 203). <p>Further clarity was also requested regarding the mobile planters along the edge of the garden terraces. These 900mm high mobile planters are intended to provide a raised green edge to the garden terraces that allows foliage to spill over the outer edge of the façade and be visible from the external areas of the site and the public domain. The mobile planters are proposed to be a 900mm high precast GRC planter, non-climbable to maintain balustrade safety, and movable in the event of programmed maintenance activities.</p> <p>Drawing LA504 has been provided with further detail of these planters.</p>
<p>3. Tree Management The City's position remains as follows:</p> <ul style="list-style-type: none"> ▪ The removal of trees 24 and 25 remains unsupported by the City, as these trees are located on the neighbouring property and will require owners' consent if removal should be required. 	<p>Goodman has now obtained landowners consent from Transport for NSW for the removal of Trees 24 and 25, refer to Appendix G.</p> <p>We acknowledge Council's comments regarding the removal of street trees 26, 27, 54, 59 and 64. We respectfully disagree with the position that these trees should be retained.</p>

Issue Raised	Response
<ul style="list-style-type: none"> ▪ The removal of street trees 26, 27, and 64 to facilitate vehicular access is not supported. It is noted that tree 27 has not been included in the AIA and is a young <i>Angophora costata</i> (Sydney Red Gum), planted by the City in September 2023 as a replacement of the previous tree. ▪ The removal of trees 54 and 59 is not supported. Despite these trees being assessed as low value due to structural concerns, their location holds strategic value for potential future plantings. Street trees should not be removed unless there is a safety concern by the City. Removed street trees will be replaced with trees in accordance with the City of Sydney Street Tree Master Plan and in the same location. 	<p>Trees 26, 27 and 64 must be removed to enable safe and functional vehicular access (including Brigade access) to the site. This access strategy has been carefully considered and cannot be achieved without their removal.</p> <p>Tree 27, while not included in the AIA, is a recently planted replacement (September 2023) and not yet established. Its removal is necessary given its direct conflict with the proposed entry point.</p> <p>Trees 54 and 59, although noted as having “strategic value,” have been assessed as structurally poor and low in arboricultural value. Their retention is not feasible given their location within key access and servicing zones.</p> <p>Replacement planting will be undertaken in accordance with the City’s Street Tree Master Plan and relevant public domain requirements, with the broader landscape strategy supporting long-term canopy and amenity objectives.</p>
<p>4. Public Domain</p> <p><u>4.1 Public Domain upgrades</u></p> <p>Given the proposal for five new driveway crossovers, the scale of the development and the intensification of the use, it is warranted that the surrounding public domain frontages should be upgraded to meet the City’s standards. Public Domain Plans are to be submitted, with landscape and architectural drawings showing the existing road reserve conditions including give driveway crossovers and existing street trees to be both retained and removed.</p> <p><u>4.2 Driveways</u></p> <p>The proposed 4 driveways are to be amended so that their width and design meet the City’s Technical Specification. There is concern that pedestrian safety may be an issue, particularly at the location of two driveways side by side on Burrows Road. The driveways also do not match up with the diagrams depicted with swept paths in the Transport Management and Accessibility Plan submitted with this amended application. The documentation is to be fully coordinated to address any discrepancies.</p> <p>Fire Brigade access from Canal Road is proposed in the location of the existing street light pole. This is to be considered at assessment stage, as any light pole relocation requires acceptance by Ausgrid/City and documented in the Public Domain Plan.</p> <p>Additionally, sections through driveways are to be provided and extended to the centreline of the road carriageway to demonstrate compliance with the AS/NZS2890.1 for required</p>	<p><u>4.1 Public Domain Upgrades</u></p> <p>We accept the requirement for public domain upgrades and are prepared to address this via a condition of consent. Updated Public Domain Plans will be provided to reflect Council’s expectations and can be finalised as part of the post-consent / construction certificate process.</p> <p><u>4.2 Driveways</u></p> <p>Noted. Design review has been updated using the latest plans and attached to the updated TMAP.</p> <p>The following drawings from the City of Sydney Technical Specifications have been reviewed:</p> <ul style="list-style-type: none"> • Drawing No. 2.4.7 – Commercial (light) vehicular crossing. • Drawing No. 2.4.8 – Commercial (heavy) vehicular crossing. <p>Both drawings recommend a maximum driveway width of 6.0 m; however, the swept path design review shows that a wider driveway is required to accommodate the design vehicle within the site. Therefore, a swept path assessment has been used to inform the minimum width of each driveway. The two heavy vehicle driveways on Burrows Road have been reviewed to reduce their widths. The northern heavy vehicle driveway has been reduced by 4.9 m, and the southern heavy vehicle driveway has been reduced by 1.25 m.</p>

Issue Raised	Response
<p>minimum ground clearance. The proposed sections must be designed in accordance with the City's standards and specifications.</p>	<p>Regarding the Fire Brigade access from Canal Road, the project team is aware of the existence of this pole, and the necessary steps will be taken post consent to resolve it.</p>
<p><u>4.3 Footway width</u> It is noted from the Ground Floor Mezzanine Landscape Plan that the footway width is narrow on the corner of Burrows Road and Canal Street. This narrow width, together with the proposed pedestrian / cycle connection to the lobby will compromise pedestrian circulation</p>	<p>Regarding the sections through driveways, the gradient and its changes have been reviewed and added to the plan. It is confirmed that the proposed gradients comply with AS/NZS 2890 – refer to the updated TMAP.</p>
<p>We request that a dimension is shown on the footway corner to demonstrate that it meets the minimum access width requirements of the Australian Standard and the City's Sydney Streets Design Code and Technical Specification. If the proposed pedestrian / cycle connection to the lobby is a shared path on either of the Canal Road or Burrows Road footways, the footway width has increased minimum width requirements. If this minimum width cannot be achieved, a hard surface is required within the site boundary to provide the necessary access requirements and safe pedestrian / cycle circulation along this public footway and into/ from the site.</p>	<p><u>4.3 Footway Width</u> Council's comments regarding the narrow width of the existing footpath at the corner of Burrows Road and Canal Street are acknowledged.</p> <p>In response, a dimension has now been added to the architectural plans, confirming the existing footpath width at this 'pinch point' location is 1.29 metres. This section of footpath is located outside the site boundary and forms part of the existing public domain.</p>
<p><u>4.4 Lines and gradients</u> Longitudinal sections are required, showing existing and proposed boundary levels, top of kerb and invert of gutter levels on the same longitudinal section along the property boundary (Canal Road and Burrows Road frontage) to demonstrate compliance with the City's requirements. Any transition on footpath necessary to achieve complying driveway design shall be demonstrated in the longitudinal section.</p>	<p>Any works within the public domain, including footpath widening to achieve compliance with the Sydney Streets Design Code and Technical Specifications, will be addressed at the Construction Certificate (CC) stage, noting that the City typically requires full public domain upgrades prior to completion.</p>
<p><u>4.5 Stormwater</u> The following stormwater issues remain unresolved:</p> <ul style="list-style-type: none"> ▪ DRAINS modelling and discharge calculations have not been provided. Sections through each proposed connection must be submitted and shall include HGL in colour for 1:20 and 1:100 storm to demonstrate compliance with the City's requirements. Both connections shall be included in the DRAINS modelling which must present upstream catchment flow at the point of connection to confirm that City's drainage system has not being overwhelmed by more than 10% increase flow from the site. Note that the stormwater pit on the corner of Burrows Road and Canal Road has a metal plate over the grate, possibly bolted down. There will be difficulty getting an invert level for this pit. ▪ Provide a catchment plan and show any bypass areas and flow quantities. ▪ The MUSIC report does not contain the MUSIClink results so it is difficult to verify whether there are any failing parameters (it is not described in the report) to mimic the hydraulics of the PSorb filters. For the 'SF Precast DN3250 Manhole' please provide the value the K factor has been set to. 	<p><u>4.4 Lines and Gradients</u> Gradients and RLs have been provided in the updated plans. Driveways, circulation roadways, hardstand area, and ramps gradients have been reviewed, as shown in the updated TMAP.</p> <p><u>4.5 Stormwater</u> Refer to Costin Roe Consulting drawings CO11035.05-SSDA480 and SSDA481 for the pre and post development HGL assessments noted. The HGL assessments confirm there are no negative impacts on the operation of the infrastructure drainage in the post development. We note that the post development flows from the site do not increase as the existing site is currently fully developed. The change in catchments being drained to the Canal Road system results in a reduction in flow part of Canal Road.</p> <p>Refer to Costin Roe Consulting drawings CO11035.05-F110 and F111 for a pre and post development catchment plan. This clearly shows bypass arrangements and general flow quantities.</p>

Issue Raised	Response
<p><u>4.6 Flood assessment</u> The proposal involves filling with the site marked as “flood storage” in the flood mapping which is likely to have significant flooding impacts in the surrounding area. The flood report submitted with the amended application is based on Alexandra Canal flood study by TfNSW, which is not the latest available flood study.</p> <p>The City recommends that the latest available flood model be obtained from Inner West Council for the purpose of updating the flood impact and risk assessment.</p> <p>The flood modelling is to include all storms up to and including PMF. The flood modelling is to consider latest available guidelines to assess climate change impacts. The flood mapping should include separate as well as combined impacts of increased rainfall intensity and sea level rise. The flood impact assessment is to also address the flooding impacts during construction stage and determine impacts in the post development compared to pre-development in the surrounding area.</p> <p>The flood emergency response management plan is to be updated with the latest available flood model and NSW Government Shelter-in-Place guidelines.</p>	<p><u>4.6 Flood Assessment</u> Notwithstanding the following clarification to the specific items requested by CoS, we note that all storm events and modelling outputs have been updated by CRC to address NSW DCCEEW Conservation Programs, Heritage and Regulation (CPHR) Group comments. Refer to updated report and flood modelling output by CRC. It is noted that overall similar outcomes and model outputs are experienced in the updated documents to those previously submitted.</p> <p>CRC has completed a site-specific flood model, which primarily adopts parameters consistent with the City of Sydney’s Alexandra Canal Model Conversion (WMAwater for the City of Sydney, 2020). CRC has also reviewed the Alexandra Canal Flood Study (WMAwater for Inner West Council, 2017) and Alexandra Canal Flood Risk Management Study and Plan (Stantec for Inner West Council, 2024) and incorporated information from these studies where relevant.</p> <p>The noted Council studies have been reviewed as part of the assessments completed by CRC. Additional studies, completed in relation to the adjacent St Peters Interchange/ M5/M8 Gateway Project (by Lyall and Associates for TfNSW), have also been reviewed as part of the assessments completed by CRC. These studies have been used to supplement the information available in regard to stormwater layouts of inground system and overall catchments. It is noted that the interchange drainage systems and changes in catchments do not appear to be adequately integrated in any of the Council studies or models. CRC have made the best possible allowances for the arrangement of surrounding systems and catchments</p> <p>The part of the site which is mapped as flood storage (note it is shown in the City of Sydney Council and Inner West Council study in the 1% AEP, though not in the TfNSW until the PMF) is an area of the existing site which currently comprises a recess/ sunken dock area.</p> <p>We note that the existing dock has a private drainage system which will drain this area, which is not included in councils regional flood model. The agency studies would therefore model ponding water/ water storage in an area which can in fact be drained by gravity through the existing private drainage system. Refer below output from the survey.</p>

Issue Raised	Response
	<p>The mapped area of flood storage included in the noted studies, is not considered a flood storage as it is part of the existing sites stormwater network and surface drainage management system. We note that some outflow restrictions may be seen in high flow storm events where the Canal Road drainage system has reduced capacity and high tailwater levels in Alexandria Canal, however this is considered a flash flooding issue rather than a broader flooding or flood storage condition. Per the above we consider that no flood storage should be attributed to the area based on the above conditions, and we note that the modelling by CRC shows that the loss of ponding in this location does not result in any adverse impacts in relation to flooding and/or overland flow conveyance.</p> <p>Costin Roe Consulting have reviewed the Inner West study as part of their assessments, and are of the opinion that the modelling completed shows general consistency with the Inner West assessments. Further clarifications of this is made in DCCEEW response items. Furthermore, Inner West Council has reviewed the work completed by Costin Roe Consulting and concluded that the assessments adequately address flooding and flood risk for the site. No further assessments in this regard are proposed.</p> <p>The flood modelling currently includes a range of storm events, including the 50%, 20%, 5%, 1%, 0.5% and 0.2% AEP's and the PMF. The 0.2% and 0.5% AEP's are generally consistent with climate change models. Additional responses have been added to the CRC report in regard to climate change and the range of storms assessed. As noted above, all storm events and modelling outputs have been updated to address NSW DCCEEW Conservation Programs, Heritage and Regulation (CPHR) Group comments.</p> <p>The flood emergency response assessments are based on the latest NSW Government documents, including the shelter-in-place guidelines. The assessment includes sufficient information to form a basis for the preparation of a future detailed emergency response plan. This requirement is expected to form part of the consent conditions and post approval reporting.</p>

Issue Raised

Response



5. Access and Transport

The City makes the following recommendations in relation to access and transport:

- The traffic island at northern driveway access is to be removed. This island is unnecessary and only serves to widen the driveway crossover and extend pedestrian crossing times.
- The widening of the southern driveway should be designed to retain one side of the existing driveway to minimise impact to trees and kerb line.
- The driveway width has been determined based on swept paths of simultaneous inbound and outbound articulated vehicle movements. Given projected vehicle movements, it is requested that swept paths be revised to assess opposing movements of an articulated vehicle and a rigid vehicle.
- Visitor bicycle parking is to be located in a publicly accessible area close to the building entrance(s), as per Section 3.11.3 of the Sydney DCP 2012.
- End-of-Trip facilities are to be accessible by bikes and be a minimum of 1.8m wide to allow a pedestrian and a person on a bike to pass (as per Section 3.11.3 (6) (a & b) if the Sydney DCP 2012).
- Ensure parked cars cannot obstruct access to bike parking and end-of-trip facilities.
- The Trip Generation profile included in the submission shows a large discrepancy between daily inbound and outbound trip numbers and is to be reviewed.

- Noted. This traffic island is removed and as a result the driveway width is reduced by 4.9m.

Design review has been updated using the latest plans and attached to the Appendix B of the P0115r04v4 SSDA TMAP_1-3 Burrows Road, St. Peters.PDF.

- The design review has been updated using the latest plans and included in Appendix B of the P0115r04v4 SSDA TMAP_1-3 Burrows Road, St. Peters.PDF.
The southern driveway width on Burrows Road has been reduced by 1.25m. This reduction is based on Council's comment to test one AV and one HRV passing each other, instead of testing two AVs passing each other.
- Noted. The design review has been updated and opposing movements of an articulated vehicle and a rigid vehicle have been tested.

As a result, the northern driveway width has been reduced by 4.9 m, and the southern heavy vehicle driveway width on Burrows Road has been reduced by 1.25 m. Design review has been attached to the Appendix B of the P0115r04v4 SSDA TMAP_1-3 Burrows Road, St. Peters.PDF.

Issue Raised	Response
<p>It is also recommended that a condition be imposed requiring the proponent to submit a Construction Traffic Management Plan (CTMP) and have it approved by the City before commencement of work on site.</p>	<p>(d) The Ground Level Site Plan has been updated, and 13 visitor bicycle spaces (8 in the north car parking area and 5 in the south parking area) have been provided in a publicly accessible area, close to the building entrance.</p> <p>(e) Noted. Visitor bicycle spaces have been reviewed and are proposed to be located within two car parking areas, which meets the minimum width requirement of 1.8 m.</p> <p>(f) Noted. This item will be added to the driver code of conduct section within the Operational Traffic Management Plan (OTMP) for the site.</p> <p>(g) Please note that the 15-minute daily trip generation profile attached in Appendix I of the P0115r04v4 SSSA TMAP_1-3 Burrows Road, St. Peters.PDF is based on multiple traffic surveys carried out at warehouse and distribution centres in Sydney. The surveyed data has been averaged to forecast the expected trips for the proposal.</p> <p>This forecast is based on our best knowledge and the available information for the site.</p> <p>The following is the forecasted daily inbound and outbound traffic for the site, which in most cases aligns closely:</p> <ul style="list-style-type: none"> • Total vehicles: 506.3 inbound, 520.7 outbound • Light vehicles: 415.8 inbound, 431.7 outbound • Rigid trucks: 50.9 inbound, 67.6 outbound • Articulated vehicles: 39.7 inbound, 21.4 outbound <p>However, due to the operational nature of warehouse and distribution centres, it is acknowledged that daily inbound and outbound figures may not always match during 24hour time period.</p> <p>Regarding the last Item to submit a Construction Traffic Management Plan (CTMP), It is anticipated that a condition requiring the preparation of a Construction Traffic Management Plan (CTMP) would be included as part of the future conditions of consent.</p>

Issue Raised	Response
<p>6. Public Art The revised design of the building, that is the subject of this SSD proposal, has led to the relocation of public art from the major facade locations to the secondary public art opportunity of the truck ramp on the north-west corner of the site facing the motorway.</p> <p>The indicative designs for public art in the Welsh and Major design report also create the sense that public art is viewed as a secondary, and now decorative, consideration.</p> <p>It is recommended that the canvas for public art be extended to the major facades and that the engagement of an artist be considered as a creative and cultural contribution to the more publicly accessible facades along Burrows Road.</p>	<p>The scale and location of public art have been revised to reflect the updated design and massing of the proposal. The original large-format digital façade has been replaced with a more proportionate digital screen integrated into the western elevation, which provides strong visual exposure to the motorway corridor and remains a prominent public-facing interface.</p> <p>This refined approach ensures the public art remains an intentional and considered element of the design, aligned with the project's revised scale and context. A Public Art Strategy prepared by Cultural Capital outlines the curatorial vision for the installation. The artwork will be delivered in accordance with relevant Australian Standards.</p>
<p>7. Noise Construction noise is predicted to be within to RBL+10dB limit during the permitted construction hours. It is recommended that a condition be imposed to ensure compliance with the City of Sydney code of practice for construction hours/noise 1992.</p> <p>Vibration intensive equipment has the potential to result in human comfort impacts when operated within the minimum working distances of the nearest receivers. There is also potential for the nearest industrial receiver buildings (south of the site) to be within the cosmetic damage minimum working distance for vibration intensive equipment. Building types and appropriate minimum working distances from specific vibration intensive plant to the nearest receivers should be confirmed before commencing vibration intensive works during construction. A vibration management plan is recommended to be developed to provide recommendations protecting the nearby properties, and neighbourhood amenity. Operational noise is predicted to comply with the noise with the implementation of operational noise mitigation measures. It is recommended that a condition be imposed to comply with the acoustic report.</p>	<p>Noted. Construction and operational noise impacts have been assessed, with mitigation measures proposed where necessary. We support the inclusion of appropriate conditions of consent to address these matters.</p>
<p>8. Contamination The City requests that a condition be imposed requiring compliance with the Soil Salinity Management Plan. Additionally, prior to Construction Certificate a Section A Site Audit Statement must be completed by a NSW EPA Site Auditor certifying that the site has been made suitable for the proposed use prior to the built form works commencing.</p>	<p>Noted. We support the inclusion of appropriate conditions of consent requiring compliance with the Soil Salinity Management Plan and the submission of a Section A Site Audit Statement by a NSW EPA-accredited Site Auditor prior to the issue of a Construction Certificate.</p>
<p>Inner West Council</p>	
<p>Streetscape Presentation I note that Council's previous submission raised the following concerns regarding the proposal's streetscape presentation:</p>	<p>Noted.</p>

Issue Raised	Response
<p><i>A review of the amended plans, response to the submissions and additional information provided indicates that Council's concerns with the landscaping treatment of the development when viewed from the Canal Road frontage remains outstanding. It is encouraged that the streetscape presentation of the development when viewed from Canal Road be taken into consideration by implementing landscaping that is of a height and density that will provide an adequate interface with Canal Road</i></p> <p>Given the deletion of the multistorey vehicular access ramps, the proposed landscaping is considered to be of an appropriate height and density, and the modified vehicular access design is therefore considered to be favourable for the streetscape presentation to Canal Road. The deletion of multistorey vehicular access ramps from this frontage allows for a greater positive impact from the landscape buffer along Canal Road and effectively resolves Council's previous concerns.</p>	
<p>Landscaping Amendments to provide office space within mezzanine levels and integrated landscape solutions are considered to result in an overall positive outcome which achieves amenity for the proposed office spaces comparable, or equal to, the previously proposed shared rooftop garden terrace. It is recommended that details of a maintenance plan for the ongoing management of elevated landscape terraces be provided to ensure ongoing amenity values are retained.</p> <p>However, the proposed amendments result in a reduction of landscaped area across the site from 21.6% to 19.8%. Given the amendments reduce the overall scale of development, Council considers there are opportunities to maximise landscaping across the site, and encourages further consideration to retain, at minimum, the originally proposed quantum of landscaped area across the site.</p>	<p>While the overall landscaped area has reduced, the current proposal continues to meet relevant Council controls for deep soil planting and tree canopy cover.</p> <p>The revised design balances landscape provision with functional site requirements and reflects a considered response. We consider the current landscape strategy to be appropriate and worthy of support.</p>
<p>Traffic/Pedestrian Safety Council previously raised the following concerns regarding consideration of cumulative traffic impacts within the area:</p> <p><i>The abovementioned traffic comments addressed under Council's original submission have not been addressed and still stand. Anson Group's Transport Management and Accessibility Plan (TMAP) has not addressed Council's previous comments. Further, the amended TMAP has not clarified if the traffic from the approved Boral Concrete Batching Plant State Significant Developments (SSD) have been included in the modelling given the discrepancy in the level of service of the intersections between the data provided for Boral SSD and the TMAP provided by</i></p>	<p>Noted.</p>

Issue Raised	Response
<p><i>Anson Group for the current proposal. Moreover, in the response to submissions, Anson Group have simply stated that “The parameters and extent of network modelling within the microsimulation model was agreed by TfNSW-N/A”. It is in Council’s opinion that this response is unsatisfactory and does not adequately address Council’s prior submission or explains if TfNSW are aware of the approved Boral Concrete Batching Plant SSD.</i></p> <p>It is considered that the Transport Management and Accessibility Plan by Anson Group, dated 12 December 2024 which supports the amendments has adequately addressed the concerns raised in Council's previous submission.</p>	
<p>Flooding Similarly, Council raises no further objection with regard to flooding, and considers that the amended scheme, and the provided Civil Engineering and Flood Report prepared by Costin Roe Consulting, Revision B, dated 17 October 2024 have adequately addressed this matter.</p>	Noted.
<p>Generally As outlined above, whilst Council raises no objection to the proposed amendments to reduce the scale of development and reconfigure the site, Council encourages further consideration to maximise the opportunity for landscaped area across the site.</p>	Noted – refer above.
<p>Bayside Council</p>	
<p>Generally In line with previous feedback, Council continues to recognise that the proposed development positively contributes to the current and future role of Mascot. The industrial and business precinct around Mascot is a critical component of the International Trade Gateway and is key employment land within the Eastern City District. The employment opportunities associated with the proposed development are consistent with the <i>Greater Sydney Region Plan, Eastern City District Plan, and Future Transport Strategy</i>.</p>	Noted.
<p>Changes to Zoning Council notes that since the date of lodgement of the EIS, the zoning of the subject site has changed from IN1 Light Industrial to E4 General Industrial under amending instrument <i>State Environment Planning Policy Amendment (Land Use Zones) (No 6) 2022 (EPI 857)</i>.</p> <p>Notably, the objectives of the IN1 zone were carried over to the amended instrument, in addition to the objectives to:</p>	Noted.

Issue Raised	Response
<ul style="list-style-type: none"> ▪ Enable limited non-industrial land uses that provide facilities and services to meet the needs of businesses and workers, ▪ Ensure land uses support the viability of local centres, and ▪ Support and protect industrial land for industrial uses. <p>Given the inclusion of an objective to enable limited non-industrial land uses that provide facilities and services to meet the needs of businesses and workers, it is noted that this provides additional context for the inclusion of offices ancillary to the warehouse and distribution uses.</p>	
<p>Use of Outdated Reports and Data Part 4.5 Expiry of the SEARs of the NSW Government <i>State Significant Development Guidelines</i> (the SSD Guidelines) (2021) and <i>Planning Circular PS 21-005 Changes to State Significant Development and State Significant Infrastructure</i> stipulate that SEARs are subject to a two-year expiry, with Secretary discretion to provide extensions. It is noted that the SEARs was issued on 7 February 2022, three years before the exhibition of the Amended SSDA.</p> <p>While the EIS was submitted within this timeframe, Council notes that over two years lapsed between the submission of the EIS and the amended report, which provides no proof of an approved extension to the SEARs. The SSD Guidelines and relevant Planning Circular PS 21-005 state that the expiry considerations were made to ensure the SEARs remain up to date.</p> <p>Notably, the current Industry Specific SEARs for Warehouses and distribution centres, published July 2024, requires a NABERS Embodied Emissions Materials Form and a Hazard Analysis (Pipeline) if required.</p> <p>Council notes that, due to being subject to the design competition, the applicant has made consistent collaboration with GANSW and CoS Council. Despite this, Council requests that the Department of Planning, Housing and Infrastructure (DPHI) clarify that a new SEARs is not required.</p> <p>Further to the understanding that the SEARs was issued three years prior to exhibition of the Amendment Report, Council notes that studies incorporated in the analysis for the proposed development, as well as references to former guidelines or legislation, were not updated for the current conditions of the site, this includes:</p> <ul style="list-style-type: none"> ▪ Cumulative impact, with any Development Applications or SSDAs lodged and/or approved since the original EIS, 	<p>As part of the Amendment Report process, the Applicant formally requested an amendment to SSD-35962232 under Section 37 of the <i>Environmental Planning and Assessment Regulation 2021</i>. This request was accepted by the Department of Planning, Housing and Infrastructure (DPHI), as evidenced by the public exhibition of the amended proposal. Accordingly, no update to the previously issued SEARs is required.</p> <p>Further, during post-lodgement consultation with Departmental staff on Friday, 28 March 2025, it was confirmed that the data relied upon in the submitted and exhibited reports was considered acceptable for assessment purposes.</p>

Issue Raised	Response
<ul style="list-style-type: none"> ▪ Design Excellence Strategy and Competition Report, being from October 2021 and May 2022, respectively, refer to numerous repealed information, including: <ul style="list-style-type: none"> – Zoning IN1 light industrial, now E4 General Industrial, – State and Regional Development SEPP, now contained within Schedule 1, Clause 12 of the Planning Systems SEPP, – Capital Investment Value (CIV), now Estimated Development Costs (EDC), – City of Sydney Competitive Design Policy 2013, which was repealed by a policy of the same name in 2020, and – GANSW Design Excellence Guidelines 2018, repealed by Guidelines of the same name in 2023. Council acknowledges, however, that current references were used within Appendix K Design Integrity Panel Endorsement, ▪ Transport, Traffic and Accessibility Assessment – this is addressed more comprehensively later in this letter, ▪ Appendix T Air Quality Impact Assessment referred to data recorded in 2021. Further, the data was taken under a repealed EPL Licence, being 21372 2022, the current being 17 April 2024 – eight months prior to the report submission, ▪ Appendix U Noise and Vibration Impact Assessment uses maps drawn and tests taken in 2022. Along with former cumulative impact assessment, this assessment fails to capture any developments commenced or completed since the original studies, ▪ Appendix V Geotechnical Investigation uses data extracted from the site in 2015 and 2019, ▪ Appendix Z Groundwater Assessment refers to samples taken on 30 May 2023, ▪ Appendix CC Waste Management Plan references the National Construction Code (NCC) 2019, which has been repealed by the NCC 2022, and ▪ Appendix DD Waste Management Plan, which has not been updated from the original report finalised 24 January 2022. 	
<p>Revised Landscape Plans</p> <p>Previous advice provided raised issue with the insufficient space for SRZ and TPZ within and adjacent to the site. Council notes that the revised Landscape Plans show no remaining encroachment to the TPZ; however, also notes that there are still two trees with their SRZ encroached by the proposed development, specifically:</p> <ul style="list-style-type: none"> ▪ Tree 37 <i>Melaleuca quinquernervia</i>, and ▪ Tree 40 <i>Casuarina cunninghamiana</i>. <p>Council notes that the Arboricultural Report to the Amendment Report has been prepared in line with Australian Standard AS 4970-2009: Protection of Trees on Development Sites. As identified within the report, Council requests that any proposed encroachment to the SPZ must be demonstrated by the project arborist that the trees will remain viable.</p>	<p>The Arboricultural Report submitted with the Amendment Report has been prepared in accordance with AS 4970–2009: Protection of Trees on Development Sites. While minor SRZ encroachments are acknowledged for Trees 37 and 40, these have been explicitly assessed by the project arborist. The arborist confirms that both trees are expected to remain viable, noting that the degree of encroachment is minimal and manageable. The assessment considers the species’ tolerance to root disturbance, site conditions, and the construction methodology, which incorporates measures to protect tree health during and after construction.</p>

Issue Raised	Response
<p>Traffic Assessment Upon review of the Amendment Report and supporting documentation, Council's internal traffic officers found that the Traffic Assessment for the SSDA made use of former conditions, with the survey being conducted on 9 June 2022. Notably, since conducting the survey 2.5 years prior to the submission of the Amendment Report, the full opening of the WestConnex and the Sydney Gateway Project.</p> <p>Consequently, traffic modelling used within the SSDA is not reliable and does not reflect current traffic conditions, particularly the implications to the Bayside LGA, which has experienced changes due to the State government's infrastructure upgrades.</p>	<p>It is noted that the proposed scheme has been reduced from 51,150sqm of GFA to 34,051sqm of GFA (a 35% reduction in size), which translates to the following forecasted trip generation from the site during the AM and PM peak periods:</p> <ul style="list-style-type: none"> • AM peak: reduced from 164 vehicles to 108 vehicles. • PM peak: reduced from 155 vehicles to 102 vehicles. <p>Additionally, the traffic modelling completed in 2022 used TfNSW STFM forecast data for the assessment year 2031, which assumes all major infrastructure upgrades are included. Please note that the traffic modelling for the proposal has been reviewed by TfNSW, and no objections were raised on traffic modelling grounds.</p>
<p>Transport Feedback Council notes that the 'end-of-trip' facilities are conveniently located on the ground floor, as is the bicycle parking. The site has potential to see considerable active transport service due to convenient inner-city location intersection two priority routes, being 1 and 9, as defined in the Sydney Gateway Active Transport Strategy. Council also notes that the site is also well located in proximity to the Bourke Street cycleway, a major north/south cycleway.</p> <p>Further, Council notes that public domain upgrades will be undertaken surrounding the site, inclusive of bus stop upgrades, which will accommodate the high frequency of the 358 Sydenham to Randwick bus route.</p> <p>The Transport Management and Accessibility (TMAP) briefly covers most transport modes, including descriptions of the bus services, rail services, and the condition of the active transport near the site. Council officers note that the document does not provide the detail typically provided in sustainable or green travel plans.</p> <p>The demand for site access by industrial, service, delivery, private, or via active transport will be considerable. As such, Council officers advise that appropriate consideration should be given for functional vehicle access, legible pedestrian access and movement corridors for staff and visitors using active transport methods to travel to work.</p> <p>Council notes that car parking provision for the proposed development is near maximal permitted levels. There is an absence of car share allocation within the allocated spaces as a potential sustainable transport initiative and car parking offset. Council officers recommend the inclusion of this detail within the Green Travel Plan.</p>	<p>Noted. The proposal incorporates end-of-trip facilities and bicycle parking at ground level, with pedestrian and vehicular access designed to support safe and legible movement through the site.</p> <p>We support the inclusion of a condition of consent requiring the preparation of a Green Travel Plan prior to occupation.</p>

Issue Raised	Response
<p>Further, there is no mention of electric vehicle (EV) charging for businesses or in general visitor car parking areas as required under the <i>City of Sydney Development Control Plan 2012</i>.</p>	
<p>Consultation with TfNSW Council officers recommend discussion with Transport for New South Wales (TfNSW) to include avoidance of the Mascot Town Centre – Kent Road, Coward Street and Bourke Street – as a freight and logistics access route. It is noted that the site fronts the classified road Canal Road, where TfNSW Road Network Plan 11 (Mascot to Eveleigh) provides detail for future strategic road function. Council officers advise that the Road Network Plan 11, along with the 2020 Snowy Mountains Engineering Corporation (SMEC) <i>Mascot Town Centre Precinct Transport Management and Accessibility Plan</i>, should be referenced for strategic direction for road access from Canal Road.</p> <p>Council recommends that upgrades to existing footpaths and appropriate active transport facilities should be delivered in conjunction with the proposed development. Council officers identified potential upgrades of the Ricketty Street Bridge to include a wider, legal path enabling access to Mascot Railway Station, located approximately 1,000m from the site, noting the City of Sydney plans to upgrade the Canal Road path to a shared path east to Burrows Street. This pedestrian and bicycle connection to the eastern side (Bayside LGA) of Alexandra Canal is also proposed in the <i>WestConnex ATN ST2 Planning Condition B51: Pedestrian & Cycle Implementation Strategy</i>, noting that the connection yet to be completed.</p>	<p>Noted. While we acknowledge Council's recommendations regarding strategic freight routes and active transport connectivity, these matters relate to broader regional infrastructure planning and are outside the scope of this SSDA.</p>
<p>NSW DCCEEW Conservation Programs, Heritage and Regulation (CPHR) Group</p>	
<p>CPHR has reviewed the Amendment Report and relevant supporting technical reports and provides its comments and recommendations at Attachment A. In summary, CPHR advises that the proponent must address the following issues:</p> <ul style="list-style-type: none"> ▪ the flooding investigation must determine flood behaviour, flood impacts, the suitability of the development for the subject site and emergency management. ▪ CPHR's previous comments dated 14 December 2022 and 19 May 2023 regarding the deficiencies in the flood modelling have not been addressed. ▪ the on-site detention of stormwater must address the significant flooding risk based on the findings of the Flood Report. ▪ a Flood Impact Risk Assessment (FIRA) must be prepared in accordance with the Flood Risk Management Guideline LU01 Flood Impact and Risk Assessment and address the Flood Risk Management Guideline EM01 Support for Emergency Management Planning (EM01) and Shelter-in-Place guideline for flash flooding. 	<p>Notwithstanding the following clarification to the specific items requested by CPHR Group, we note that all storm events and modelling outputs have been updated by CRC. Refer to updated report, flood modelling output by CRC and the following responses to the specific items requested of CPHR.</p> <p>It is noted that overall similar outcomes and model outputs are experienced in the updated documents to those previous submitted.</p>

Issue Raised	Response
<p>Please note that CPHR should not be given a role in any conditions of consent without prior agreement.</p>	
<p>Flooding CPHR has reviewed the provided information and has referred to the following Council flood studies:</p> <ul style="list-style-type: none"> ▪ <i>Alexandra Canal Model Conversion (WMAwater for the City of Sydney, 2020).</i> ▪ <i>Alexandra Canal Flood Study (WMAwater for Inner West Council, 2017).</i> ▪ <i>Alexandra Canal Flood Risk Management Study and Plan (Stantec for Inner West Council, 2024).</i> <p>It is CPHR’s view that the flooding investigation has not been adequately conducted to determine flood behaviour, flood impacts, the suitability of the development for the subject site and emergency management.</p> <p>CPHR remains concerned about deficiencies in the flood modelling. The proponent has not addressed CPHR’s previous comments dated 14 December 2022 and 19 May 2023. The required corrections to the flood modelling have not been made, resulting in CPHR’s lack of assurance in the modelling outputs. Until the flood model is updated, it is CPHR’s view that any conclusions regarding flood impacts and risks remain preliminary.</p> <p>The subject site is identified as a ‘hot spot’ in the Inner West Council Alexandra Canal Flood Study. Burrows Road provides the main access point to the subject site and is at risk to low hazard floodwaters from events as frequent as the 50% Annual Exceedance Probability (AEP) event. CPHR notes a secondary access point for ‘fire and utilities services’ via Canal Road has been identified but not addressed in terms of flood emergency management.</p>	<p>The noted Council studies have been reviewed as part of the assessments completed by CRC. Additional studies completed in relation to the adjacent St Peters Interchange have also been reviewed as part of the assessments completed by CRC. These have been used to supplement the information available in regard to stormwater layouts of inground system and overall catchments. It is noted that the interchange drainage systems and changes in catchments do not appear to be adequately integrated in any of the Council studies or models. CRC have made the best possible allowances for the arrangement of surrounding systems and catchments</p> <p>It is noted that The Alexandra Canal Flood Risk Management Study and Plan (Stantec for Inner West Council, 2024) provides updates to the 2017 model to integrate 2019 ARR rainfall and topographic changes (including that of the St Peters Interchange). We note that the interchange area does not appear to have been modelled with any inground drainage systems which results in the modelled outcomes showing unrealistic water depths and arrangements in this area. Our understanding is that the Interchange catchment drains north and north-east of the subject property, to two stormwater quality management basins, before then discharging to the Alexandra Canal. For this reason, the interchange catchment and any upstream catchments surrounding the area are not included in the local catchment delineation of the CRC model.</p> <p>We further note that both the 2017 and 2020 modelling completed by WMA Water for Inner West Council and City of Sydney Councils respectively do not include The St Peter Modelling and convey substantial amounts of catchment towards Canal Road, which do not currently drain to this location. These models have also negated to include drainage pits and inter-allotment drainage lines which drain the low spot mid-way along the property frontage. The flows within Canal Road and ponding levels within Burrows Road will as such be overstated.</p> <p>We do not agree with the statement that the modelling inputs cannot be relied upon. We note that Inner West Councils view is the flood modelling and risk has been adequately addressed. CRC has reviewed in detail the catchment breakdowns, modelling input and made amendments to the overall modelling allowance and TUFLOW model output. We note that</p>

Issue Raised	Response
<p data-bbox="192 571 595 595"><i>1. On-Site Detention of Stormwater</i></p> <p data-bbox="192 600 1155 679">No on-site detention (OSD) has been proposed for the subject site as it is not required by Sydney Water. However, the stormwater pipes are undersized compared to current design standards.</p> <p data-bbox="192 711 1155 791">The subject site experiences significant flooding in smaller, more frequent events. It is CPHR's view that the OSD must address the significant flooding risk based on the findings provided in the Civil Engineering and Flood Report (Flood Report).</p> <p data-bbox="192 823 454 847">Recommended action:</p> <p data-bbox="192 852 439 876">The proponent should:</p> <ol data-bbox="192 880 1155 960" style="list-style-type: none"> Assess whether OSD would mitigate flooding in Burrows Road for the range of minor to major flood events and determine whether inclusion in the proposed development is acceptable. <p data-bbox="192 992 416 1016">Extent and Timing:</p> <p data-bbox="192 1021 432 1045">Prior to determination.</p>	<p data-bbox="1205 271 1977 351">although updated modelling has been provided, a comparison of the new and previous modelling and reporting submissions shows there to be immaterial differences between the two models.</p> <p data-bbox="1205 383 2011 542">In regard to the hot spots, the ponding and flow within Burrows Road and Canal road is acknowledged and further discussed in the updated CRC report. We note that although the Inner West Council study shows the area as a hotspot, the flooding identified in the 1% AEP in Burrows Road and Canal Road is shown as low risk, however medium and high risk in the PMF event.</p> <p data-bbox="1205 574 1977 622">OSD should not be considered for this development site, as discussed in detail in our report and further outlined below.</p> <p data-bbox="1205 654 2011 766">As outlined in Section 5 of the CRC report, CRC has consulted with Sydney Water (who is the waterway manager for the area) on the requirements for OSD. This consultation confirms that OSD is not a requirement for the development.</p> <p data-bbox="1205 798 2011 877">CRC has also reviewed the need for OSD and the effect it would have if, or not, included. This assessment confirmed OSD should not be a requirement for development.</p> <p data-bbox="1205 909 1955 933">The key drivers for this development to not require OSD are as follows:</p> <ul data-bbox="1205 938 2022 1356" style="list-style-type: none"> The site discharges to a tidally influenced waterbody. As such the inclusion of OSD would not have any material differences in the water level or flow within the waterbody. The existing site is fully developed with significant existing buildings, hardstand and pavements. The proposed development of the site will not increase runoff or impact any external or public drainage systems. Refer to the pre and post development long sections and HGL assessments prepared in response to the CoS comments (Refer CRC drawings CO11035.05-SSDA480 and SSDA481 for details). The site is located at the low end of the broader catchment. OSD is not effective in reducing impact of development at the low end of the catchment. This is due to the timing effect of the catchment flows where a site with OSD will draw out the timing of the peak flow from the small catchment to coincide with the peak flow of the larger catchment, leading ultimately to an increased peak flow in Alexandra Canal.

Issue Raised	Response
<p>2. <i>Flood modelling</i> CPHR's previous comments on the adequacy of flood modelling have not been addressed. The modelling requires significant updates and additional reporting. Given the extensive list of recommended actions below, CPHR recommends the proponent's consultant extend and connect the applicable models from the abovementioned Council studies. CPHR notes the Inner West Council flood studies have not been reviewed in the Flooding Report.</p> <p>Catchment boundaries The catchment boundaries used in the 2017 Inner West Council flood study are shown in Figures 1 and 2. The "Canal Road Catchment" boundary in the proponent's Flood Report appear inaccurate and the delineation of other boundaries are illogical. Reviewing these boundaries using the data from the 2017 Inner West Council Flood Study is required.</p> <p>Recommended actions: The proponent must:</p> <ol style="list-style-type: none"> Review all catchment boundaries and update their delineation as required, comparing them with relevant Council studies and using the stormwater mapping from Inner West Council. Conduct a detailed assessment displaying stormwater drainage lines and providing a topographic map to demonstrate accuracy of an updated catchment boundary. Assign each relevant stormwater pit in the Transport for NSW drainage line and include its full catchment, which extends further upstream as identified in the 2017 Inner West Council Flood Study. 	<ul style="list-style-type: none"> The majority of the site catchments discharge to twin 1050mm RCP within Canal Road. We note that the Inner West Council and City of Sydney Council GIS information shows only one 1050mm pipe in the same location. It is likely that the capacity issues shown in both Council models are related to their models only including one pipe and not two. It is noted that the TfNSW studies include the twin pipes. Refer to Figures G3.2 and G3.3 in Appendix G of the CRC report. OSD has not been a requirement for several nearby development sites due to the reasons outlined above, and being consistent with the requirements of the waterway manager (i.e. Sydney Water). <p>The catchments have been reviewed and adjusted accordingly. These have been based on topography, GIS stormwater layouts (both City of Sydney, The Inner West Council), survey information, TfNSW information and ground truthing inspections. Refer to drawings CO11035.05-F110 and F111 and new external stormwater layout on drawings CO11305.05-F120 and F121.</p>
<p>Runoff along Canal Road Runoff from properties fronting Canal Road that flows into Canal Road has not been addressed. Also, some properties located on the southern side of the Princes Highway must be included as they may drain toward Canal Road.</p>	<p>The model boundaries have been extended as suggested – refer drawings CO11035.05-F110 and F111 for clarification of the revised model extent. The modelling shows acceptable impacts to all surrounding properties in relation to the development.</p>

Issue Raised	Response
<p>Recommended actions: The proponent must include:</p> <ol style="list-style-type: none"> Runoff from properties fronting Canal Road flowing into Canal Road. Properties on the southern side of the Princes Highway that drain toward Canal Road. 	
<p>Tailwater levels The tailwater levels in the model appear to be quoted incorrectly as the levels provided do not match the model results. For example, a tailwater level of 2.4 m is quoted for the 1% AEP however the flood level on the map appears to be less than 1.6 m.</p> <p>Recommended actions: The proponent should:</p> <ol style="list-style-type: none"> State adopted tailwater levels for all events and their source, for example the relevant Council flood study. Check tailwater levels have been applied correctly and update as required. 	<p>Refer to adopted tailwater levels in Table G3.3. This table has also been updated to include all modelled storm events. The quoted 1% AEP tailwater level is confirmed to be RL 1.9m AHD, which is consistent with the modelled levels – refer drawing CO11035.05-F230 and F330.</p>
<p>Additional model requirements The flood model must include the relevant proposed stormwater infrastructure as changing the stormwater catchments and discharge points may have a flood impact.</p> <p>The hydraulic model boundary must encompass all impacted areas, including properties southwest of Canal Road, such as the business park at 9 Canal Road. Additionally, the downstream model boundary is too close to the proposed development and should be considered for relocation further south on Burrows Road.</p> <p>Recommended actions: The proponent must:</p> <ol style="list-style-type: none"> Update the modelling to include stormwater infrastructure and impacted properties southwest of Canal Road. Consider relocating the downstream model boundary further south on Burrows Road. 	<p>The post-development modelling includes the revised discharge arrangements. We note that the overall catchment breakdown between Burrows Road and Canal Road systems has been achieved.</p> <p>As clarified earlier, the model boundaries have been extended as suggested – refer to drawing CO11035.05-F120 and F121 for clarification of the revised model extent. The downstream boundary has been modelled to be at least 2.5 times the width of flow downstream of the study area. This follows general adopted industry practice in relation to setting minimum distances for downstream model extent.</p>
<p>Manning's n roughness value The Manning's n roughness value for Alexandra Canal is very low at 0.015, which corresponds to a value for concrete or brickwork. This value must be increased to an appropriate level from Table 6.2.1 of the Australian Rainfall and Runoff and refer to Council's flood studies. For example, the 2017 Inner West Council Flood Study uses a value of 0.03 for lakes/wetlands.</p> <p>Recommended action: The proponent must:</p>	<p>The flow and water level within Alexandra Canal will be constrained by the downstream water levels at the model boundary rather than Mannings N. notwithstanding this, we have updated the roughness values to 0.03 as requested. Elsewhere Mannings values are consistent with ARR and relevant adopted council models.</p>

Issue Raised	Response
<p>11. Update the Manning's n roughness value for Alexandra Canal by referring to Table 6.2.1 in Australian Rainfall and Runoff and Council flood studies.</p>	
<p>Assessment requirements The Flood Report needs to demonstrate how the modelling has addressed the Flood Risk Management Manual (Department of Planning and Environment, 2023).</p> <p>Recommended actions: The proponent must:</p> <ol style="list-style-type: none"> 12. Provide all relevant calculations including climate change and the Probable Maximum Flood (PMF). 13. Demonstrate how the guidelines supporting the Flood Risk Management Manual have been considered, including FB01 – Understanding and Managing Flood Risk and FB04 – Incorporating 2016 Australian Rainfall and Runoff into studies, and the latest version of Australian Rainfall and Runoff. 14. Compare relevant catchment flows, focusing on Alexandra Canal, and other inflows with the relevant Council models. 15. Prepare maps that compare flood levels to those in the Council studies for key flood events, such as 5% AEP, 1% AEP and PMF events. 	<p>The flood modelling completed by CRC currently includes a range of storm events, including the 50%, 20%, 5%, 1%, 0.5% and 0.2% AEP's and the PMF. The 0.2% and 0.5% AEP's are generally consistent with climate change models. Additional responses have been added to the CRC report in regard to climate change and the range of storms assessed. As noted, these events have been updated in the CRC report to address the technical comments posed by CPHR.</p> <p>Demonstration of adherence to the guidelines supporting the Flood Risk Management Manual have been considered and included in Section 7.7 and 7.8 of the CRC report. This work includes consideration to FB01 – Understanding and Managing Flood Risk and FB04 – Incorporating 2016 Australian Rainfall and Runoff into studies, and the latest version of Australian Rainfall and Runoff</p> <p>Comparison of flow information has been included in Appendix G.</p> <p>Digital information from the Council model is not available to prepare detailed comparison maps. Visual comparisons show consistency within Alexandra Canal (noting these areas have consistent tailwater levels and flows) and general consistency within urban areas. As previously noted, there are some differences in the inground systems allowed for in the CRC models which are not in the CoS and Inner West council models, hence there will not be direct correlation of overland flow in Canal Road and Burrows Road.</p>
<p>Flood storage The Flood Report suggests that upwelling on the subject site is due to high flood levels in the Alexandra Canal. However, flood levels at the sag appear to be around 2.5 m Australian Height Datum (AHD) in the 1% AEP event (no level contours were provided at that location), while Alexandra Canal flood levels are about 1.8 m AHD. It seems more likely that the pipe in Canal Road is undersized, preventing flows from leaving the subject site and potentially causing upwelling. The 2017 Inner West Council Flood Study indicates these pipes exceed capacity on average once every two years, which is significantly below current design standards.</p> <p>Recommended action:</p>	<p>The part of the site which is mapped as flood storage (note it is shown in the City of Sydney Council and Inner West Council study in the 1% AEP, though not in the TfNSW until the PMF) is an area of the existing site which currently comprises a recess/ sunken dock area.</p> <p>We note that the existing dock has a private drainage system which will drain this area, which is not included in councils regional flood model. The agency studies would therefore model ponding water/ water storage in an area which can in fact be drained by gravity through the existing private drainage system. Refer below output from the survey.</p>

Issue Raised

The proponent must:
16. Update the flooding assessment to provide further detail on loss of flood storage.

Extent and Timing:

Prior to determination.

Response

The mapped area of flood storage included in the noted studies, is not considered a flood storage as it is part of the existing sites stormwater network and surface drainage management system. We note that some outflow restrictions may be seen in high flow storm events where the Canal Road drainage system has reduced capacity, however this is considered a flash flooding issue rather than a broader flooding or flood storage condition. Per the above we consider that no flood storage should be attributed to the area based on the above conditions, and we note that the modelling by CRC shows that the loss of ponding in this location does not result in any adverse impacts in relation to flooding and/or overland flow conveyance.



3. Inadequate flood impact and risk information

The Flood Report requires additional work to adequately assess the flood impact and risk for the proposed development. Areas of improvement include analysis of flood behaviour, flood impacts, the suitability of the development for the subject site and emergency management. Also, comparison of flood levels, velocities and hazard for pre- and post-development scenarios.

The CRC report has been updated to include additional information and updated modelling as requested.

The flood modelling and FIRA has been completed by CRC, a consultant who specialises in flood risk management, with expertise in catchment hydrology and floodplain hydraulics. This has been demonstrated through multiple SSDA approvals on similar developments which have required the preparation of flood modelling and FIRA's.

Issue Raised	Response
<p>The report should be prepared by a consultant specialised in flood risk management, with expertise in catchment hydrology and floodplain hydraulics. They must have good working knowledge of flood risk management practices and guidelines in NSW.</p> <p>The proposed Flood Planning Level (FPL) of 3 m AHD would not provide any freeboard to the flood levels at the western part of the subject site on Canal Road.</p> <p>Recommended actions: The proponent must:</p> <ol style="list-style-type: none"> 17. Prepare a Flood Impact and Risk Assessment (FIRA) in accordance with the Flood Risk Management Guideline LU01 Flood Impact and Risk Assessment. The FIRA includes analysis of flood behaviour, flood impacts, the suitability of the development for the subject site and emergency management. Also compare flood levels, velocities and hazard for pre- and post-development scenarios. 18. Ensure the FIRA is prepared by a consultant specialised in flood risk management, with expertise in catchment hydrology and floodplain hydraulics. 19. Revise the flood mapping to ensure flood level contours are visible for all relevant areas. 20. Update the impact figures to differentiate between impacts greater than 0.01 m and those less than 0.01 m, as impacts greater than 0.01 m are significant. 21. Consider varying the FPL across the subject site to match the corresponding flood levels. <p>Extent and Timing: Prior to determination</p>	<p>In regard to the flood planning level, the modelled 1% AEP flood level at the Canal Road driveway is noted to be RL 2.995m. an FPL of 3.445m could be attributed to the flood level at this location. We note that the building floor level is RL4.7m AHD, as such is more than 1.7m above the 1% AEP flood level and 1.2m above the Canal Road FPL. The report has been updated to reference FPL in relation to the Canal Road flow path. We also note that the design drawings have been adjusted to increase the level of the egress driveway from RL 3.2m to 3.5m to be above the FPL, noting that this provides additional flood resilience to the design over an above that required to meet normal flood planning requirements.</p> <p>The flood modelling and risk assessments are included in Sections 7 and Appendices G of the CRC report.</p> <p>Flood contours are included for all flood surfaces at 0.2m intervals. The locations of the contours are obviously dependent on the flood levels. Where contours are not present, reporting points have been included to confirm and supplement the information. Reporting point output can be found on flood output drawings (CO11035.05-F500 series), and have been included in Table 7.1 of the CRC report.</p> <p>Flood report and figures have been updated as recommended.</p>
<p>4. Emergency Management The FIRA should address EM01 Support for Emergency Management Planning. Guideline EM01 recommends that any emergency response strategy must be consistent with NSW State Emergency Service (SES) local flood plans. Issues related to flood emergency management must be coordinated with the NSW SES and be adequately resolved before determination to ensure that the proposed development is compatible with the flood function and behaviour of the land.</p> <p>The Flood Report has implied a shelter-in-place strategy with references to onsite refuge. However, shelter-in-place is generally not recommended for new developments.</p> <p>The Shelter-in-Place guideline for flash flooding (Department of Planning, Housing and Infrastructure, 2024) has not been addressed. The surrounding roads are susceptible to high hazard flooding.</p>	<p>The building floor level is noted to be RL4.7m AHD, hence is 0.9m above the PMF flood level of RL3.8m. The site is noted to be an isolated flood island in the PMF event, however egress from the site can be made in H1 Hazard flood hazard categorisation flooding in Canal Road in events to the 0.2% AEP (refer flood output drawing CO11035.05-F352).</p> <p>The preferred safety outcome for this site would be for persons to vacate the premises, as directed by SES or other relevant authority, prior to flood conditions becoming unsafe. The intent for shelter in place is for this to be a secondary option for the facility. Additional commentary on shelter in place has been added to Section 7.8 of the document.</p> <p>We note that a detailed discussion in relation to the Emergency Response Principles included in the EM01 Support for Emergency Management</p>

Issue Raised	Response
<p>CPHR does not consider that private flood emergency response plans are a substitute for land use planning. Section A2.4.2 of EM01 states that 'requiring a site-specific flood response plan as a condition of consent for development is not considered a genuine attempt to manage flood risk to future occupants' and provides further guidance on issues with such plans.</p> <p>Recommended actions: The proponent should ensure:</p> <ul style="list-style-type: none"> 22. The FIRA discusses the compatibility of the proposed development, residual risk and emergency management. Part D of Guideline EM01, Figure 21, outlines a decision-making process for redevelopment or infill development compatible with existing zoning. 23. The FIRA addresses the Shelter-in-Place guideline for flash flooding. 24. The assessment considers longer durations of flooding and calculate the maximum duration of isolation. 25. The assessment discuss the access point via Canal Road and its proposed operation. <p>Extent and Timing: Prior to determination</p>	<p>Planning. Guideline EM01, and a direct response to the SES letter RtS letter (SES Ref: ID1972, dated 15 June 2023) has been included in Section 7.9 of the CRC report. This assessment demonstrates suitability for development and management of safety in accordance with SES and noted EM01 document.</p> <p>We note the CRC report provides sufficient information to show that the development can be undertaken and to provide initial information to enable the provision of a detailed future Emergency Management Plan that would be required as part of Post approval consent conditions</p>
<p>Biodiversity CPHR notes the project description provided in the Amendment Report is consistent with the Biodiversity Development Assessment Report (BDAR) waiver for this SSD that was granted on 22 January 2025. If the proposed development is changed so that it is no longer as described in Schedule 1 of the determination, the proponent will need to lodge a new BDAR waiver request or prepare a BDAR.</p>	<p>Noted.</p>
<p>NSW DCCEEW as delegate of Heritage Council of NSW</p>	
<p>Heritage NSW notes that there are no items listed on the State Heritage Register within the proposed SSD site, and no areas of archaeological potential identified. We have no further comment on the Amendment Report.</p>	<p>Noted.</p>
<p>NSW DCCEEW as delegate of Heritage NSW (ACH)</p>	
<p>The updated Aboriginal Cultural Heritage Assessment Report (ACHAR) has been prepared in reference to the relevant guidelines as required by the Secretary's Environmental Assessment Requirements. The ACHAR outlines that no Aboriginal objects or areas of archaeological potential were identified within the study area and that no Aboriginal cultural heritage values will be impacted by the proposal. Heritage NSW agrees with the proposed</p>	<p>Noted. The findings and recommendations of the ACHAR are acknowledged, and we support the inclusion of appropriate conditions of consent to implement the management measures outlined in Sections 9 and 10 of the report, including the requirement to involve Registered Aboriginal Parties in the unexpected finds protocol.</p>

Issue Raised	Response
<p>management measures and recommendations (Sections 9 and 10 of the ACHAR) however provides the following comment:</p> <ul style="list-style-type: none"> ▪ In relation to the recommendations for the implementation of unexpected finds procedures for unexpected Aboriginal objects and human remains as outlined in Sections 9 and 10 of the ACHAR, when finalising the protocols for inclusion in the Construction Environmental Management Plan (CEMP), please ensure they are amended to include notification and/or involvement of Registered Aboriginal Parties not just the Metropolitan Local Aboriginal Land Council. <p>Heritage NSW has no further comments on the proposal and does not require any further agency consultation in relation to this project. Recommendations in relation to Draft Conditions of Consent are included in Attachment A (below).</p>	
<p>Aboriginal Heritage</p> <ol style="list-style-type: none"> 1. All reasonable steps must be taken to avoid harm, modification, or other impact to Aboriginal objects except as authorised by this approval. 2. The Registered Aboriginal Parties must be kept informed about the SSD. The Registered Aboriginal Parties must continue to be provided with the opportunity to be consulted about the Aboriginal cultural heritage management requirements of the SSD. 3. Prior to carrying out any development, the Applicant must ensure Aboriginal heritage management procedures are prepared for the development and included in the Project's Construction Environmental Management Plan (CEMP). The Aboriginal heritage management procedures must: <ol style="list-style-type: none"> a. be prepared by suitably qualified and experienced persons; b. be prepared in consultation with Registered Aboriginal Parties and be reviewed by Heritage NSW; c. include a description of the measures that would be implemented for: <ol style="list-style-type: none"> i. ongoing consultation with Registered Aboriginal Parties, including consultation regarding changes to the management of Aboriginal cultural heritage. ii. a contingency plan and reporting procedure for the management of Unexpected Heritage Finds and Human Remains that is prepared by suitably qualified and experienced heritage specialist in relation to Aboriginal cultural heritage, in consultation with the Registered Aboriginal Parties and in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (2010). The Unexpected Heritage Finds and Human Remains Procedure, as 	<p>Noted. We support the inclusion of appropriate conditions of consent requiring the preparation of Aboriginal heritage management procedures as part of the Construction Environmental Management Plan (CEMP), in consultation with Registered Aboriginal Parties and in accordance with relevant guidelines.</p>

Issue Raised	Response
<p>submitted to the Planning Secretary, must be implemented for the duration of construction.</p> <p>iii. ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions.</p>	
<p>Transport for New South Wales (TfNSW)</p>	
<p>TfNSW has reviewed the amendments and reiterates the suggested conditions provided to the Department in the previous submission of 16 December 2022 (below):</p> <p>Excavation As the subject site directly abuts WestConnex, TfNSW needs to ensure that any excavation and final settlement of the proposed structures does not impact the motorway.</p> <p><u>Recommendation:</u> The developer is to submit design drawings and documents relating to the excavation of the site and support structures to TfNSW for assessment, in accordance with Technical Direction GTD2020/001.</p> <p>The developer is to meet the full cost of the assessment by TfNSW. Documents should be submitted to development.sydney@transport.nsw.gov.au.</p> <p>If it is necessary to excavate below the level of the base of the footings of the adjoining roadways, the person acting on the consent shall ensure that the owner/s of the roadway is/are given at least seven (7) day notice of the intention to excavate below the base of the footings. The notice is to include complete details of the work.</p>	<p>Noted. We support the inclusion of appropriate conditions of consent requiring the submission of excavation and support structure documentation to TfNSW for assessment in accordance with Technical Direction GTD2020/001, and will ensure notification requirements to adjoining roadway owners are met where relevant.</p>
<p>Section 138 Concurrence <u>Recommendation:</u> If any civil works are proposed on the classified state road network (i.e., new stormwater connection or new kerb and gutter etc,) the following requirements shall be satisfied, prior to the release of the relevant construction certificate:</p> <ol style="list-style-type: none"> 1. The applicant shall obtain concurrence under section 138 of the <i>Roads Act 1993</i> and enter into a WAD for any civil works on the classified state road network. Please contact development.sydney@transport.nsw.gov.au for TfNSW requirements under the Roads Act and WAD process. 2. Detailed design plans and hydraulic calculations of any changes to the stormwater drainage system, the discharge into the existing pit and its connection to the existing 	<p>Noted. We support the inclusion of appropriate conditions of consent requiring Section 138 concurrence and entry into a Works Authorisation Deed (WAD) with TfNSW for any civil works on the classified state road network, including the submission of detailed design plans and hydraulic calculations for approval prior to works commencing.</p>

Issue Raised	Response
<p>pit are to be submitted to TfNSW for approval prior to the commencement of any works.</p> <p>Please send all documentation to development.sydney@transport.nsw.gov.au. A plan checking fee will be payable and a performance bond may be required before TfNSW approval is issued.</p>	
<p>Construction Pedestrian and Traffic Management</p> <p>Prior to the issue of any Construction Certificate or any preparatory, demolition or excavation works, whichever is the earlier, the Applicant shall:</p> <ul style="list-style-type: none"> ▪ Prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with TfNSW. <p>The CPTMP needs to specify matters including, but not limited to, the following:</p> <ul style="list-style-type: none"> – A description of the development; – Location of any proposed work zone(s); – Details of crane arrangements including location of any crane(s); – Haulage routes; – Proposed construction hours; – Predicted number of construction vehicle movements and detail of vehicle types, noting that vehicle movements are to be minimised during peak periods; – Details of specific measures to ensure the arrival of construction vehicles to the site do not cause additional queuing on public roads; – Details of the monitoring regime for maintaining the simultaneous operation of buses and construction vehicles on roads surrounding the site; – Pedestrian and traffic management measures; – Construction program and construction methodology; – A detailed plan of any proposed hoarding and/or scaffolding; o Consultation strategy for liaison with surrounding stakeholders, including other developments under construction; – Any potential impacts to general traffic, cyclists, pedestrians and light rail and bus services within the vicinity of the site from construction vehicles during the construction of the proposed works; – Cumulative construction impacts of surrounding projects. Existing CPTMPs for developments within or around the development site should be referenced in the CPTMP to ensure that coordination of work activities are managed to minimise impacts on the surrounding road network; and – Proposed mitigation measures. Should any impacts be identified, the duration of the impacts and measures proposed to mitigate any associated general traffic, public transport, pedestrian and cyclist impacts should be clearly identified and included in the CPTMP. 	<p>Noted. It is anticipated that a condition requiring the preparation of a Construction Traffic Management Plan (CTMP) would be included as part of the future conditions of consent.</p>

Issue Raised	Response
<ul style="list-style-type: none"> ▪ Submit a copy of the final plan to development.ctmp.cjp@transport.nsw.gov.au for TfNSW endorsement; and ▪ Provide the builder's direct contact number to small businesses adjoining or impacted by the construction work and TfNSW to resolve issues relating to traffic, public transport, freight, servicing and pedestrian access during construction in real time. The Applicant is responsible for ensuring the builder's direct contact number (via development.ctmp.cjp@transport.nsw.gov.au) is current during any stage of construction. 	
<p>Impacts on Traffic Flow on the surrounding classified road network during Construction Activity</p> <p>A Road Occupancy Licence (ROL) should be obtained from Transport Management Centre for any works that may impact on traffic flows on the state road network during construction activities. A ROL can be obtained through https://myrta.com/oplinc2/pages/security/oplincLogin.jsf</p>	<p>Noted. We support the inclusion of appropriate conditions of consent requiring the Applicant to obtain a Road Occupancy Licence (ROL) from the Transport Management Centre for any construction works that may impact traffic flow on the classified state road network.</p>
<p>NSW Fire and Rescue</p>	
<p>FRNSW note the proposal includes a multi-level warehouse. It is the experience of FRNSW that developments of this type pose special problems of firefighting. To ensure first responders have the ability to render safe an incident, should this project be approved, FRNSW make the following recommendations:</p> <ol style="list-style-type: none"> 1. Compliance is demonstrated with FRNSW fire safety guideline - Access for fire brigade vehicles and firefighters. Perimeter Vehicle Access must be provided at ground level and of an obvious and appropriate hardstand material.¹ 2. It is the experience of FRNSW that the water demand for fire infrastructure servicing a development of this scope is unlikely to be supplied by mains water alone. FRNSW recommend that suitable design considerations are considered for the placement of tanks and other firefighting infrastructure if required. 3. That thorough analysis of the Fire Brigade Intervention Model is conducted to ensure that appropriate water supply is provided for hydrant and sprinkler systems. 4. Implement the applicable provisions of AS2419 Appendix C (informative). 5. Prior to occupation or commissioning an Emergency Plan (EP) is developed for the site in accordance with HIPAP No.1. 6. Prior to occupation or commissioning an Emergency Services Information Package (ESIP) be prepared in accordance with FRNSW fire safety guideline – Emergency services information package and tactical fire plans. 	<p>Noted. We support the inclusion of appropriate conditions of consent requiring compliance with FRNSW fire safety guidelines, including vehicle and firefighter access, water supply considerations, the Fire Brigade Intervention Model, and relevant provisions of AS 2419. We also support conditions requiring the preparation of an Emergency Plan (EP) and Emergency Services Information Package (ESIP) prior to occupation or commissioning.</p>
<p>Ausgrid</p>	

Issue Raised	Response
<p>Ausgrid has undertaken a review of the EIS and associated information in relation to potential impacts or interfaces with Ausgrid’s electricity infrastructure.</p> <p>Ausgrid requires that due consideration be given to the compatibility of proposed development with existing Ausgrid infrastructure, particularly in relation to risks of electrocution, fire risks, Electric & Magnetic Fields (EMFs), noise, visual amenity and other matters that may impact on Ausgrid or the development.</p> <p>Ausgrid has reviewed “Appendix B Architectural Plans” and advise the proponent must discuss disconnection of existing infrastructure and any new connections and load requirements to the site directly with Ausgrid and submit a connection application to Ausgrid as soon as practicable. We encourage the proponent to continue to discuss their requirements directly with Ausgrid as needed.</p>	<p>Noted.</p>
<p>Ausgrid Underground Cables are in the vicinity of the development</p> <p>Special care should be taken to ensure that driveways and any other construction activities do not interfere with existing underground cables located in the footpath or adjacent roadways.</p> <p>It is recommended that the developer locate and record the depth of all known underground services prior to any excavation in the area. Information regarding the position of cables along footpaths and roadways can be obtained by contacting Before You Dig Australia (BYDA).</p> <p>In addition to BYDA the proponent should refer to the following documents to support safety in design and construction:</p> <ul style="list-style-type: none"> ▪ SafeWork Australia – Excavation Code of Practice. ▪ Ausgrid’s Network Standard NS156 which outlines the minimum requirements for working around Ausgrid’s underground cables. <p>The following points should also be taken into consideration.</p> <ul style="list-style-type: none"> ▪ Ausgrid cannot guarantee the depth of cables due to possible changes in ground levels from previous activities after the cables were installed. ▪ Should ground levels change above Ausgrid’s underground cables in areas such as footpaths and driveways, Ausgrid must be notified, and written approval provided prior to the works commencing. ▪ Should ground anchors be required in the vicinity of Ausgrid underground cables, the anchors must not be installed within 300mm of any cable, and the anchors must not pass over the top of any cable. 	<p>Noted.</p>

Issue Raised	Response
<p>Ausgrid Chamber Substation in the vicinity of the development The substation ventilation openings, including substation duct openings and louvered panels, must be separated from building air intake and exhaust openings, natural ventilation openings and boundaries of adjacent allotments, by separation distances which meet the requirements of all relevant authorities, building regulations, BCA and Australian Standards including AS 1668.2: The use of ventilation and air-conditioning in buildings - Mechanical ventilation in buildings.</p> <p>In addition to above, Ausgrid requires the substation ventilation openings, including duct openings and louvered panels, to be separated from building ventilation system air intake and exhaust openings, including those on buildings on adjacent allotments, by not less than 6 metres.</p> <p>Exterior parts of buildings within 3 metres in any direction from substation ventilation openings, including duct openings and louvered panels, must have a fire rating level (FRL) of not less than 180/180/180 where the substation contains oil-filled equipment, or 120/120/120 where there is no oil filled equipment and be constructed of non- combustible material.</p> <p>The development must comply with both the Reference Levels and the precautionary requirements of the ICNIRP Guidelines for Limiting Exposure to Time-varying Electric and Magnetic Fields (1 HZ – 100 kHz) (ICNIRP 2010).</p> <p>For further details on fire segregation requirements refer to Ausgrid's Network Standard 113. Existing Ausgrid easements, leases and/or right of ways must be maintained at all times to ensure 24-hour access. No temporary or permanent alterations to this property tenure can occur without written approval from Ausgrid. For further details refer to Ausgrid's Network Standard 143.</p>	<p>Noted.</p>
<p>New Driveways – Proximity to Existing Poles Proposed driveways shall be located to maintain a minimum clearance of 1.5m from the nearest face of the pole to any part of the driveway, including the layback, this is to allow room for future pole replacements. Ausgrid should be further consulted for any deviation to this distance.</p>	<p>Noted.</p>
<p>New or modified connection To apply to connect or modify a connection for a residential or commercial premises. Ausgrid recommends the proponent to engage an Accredited Service Provider and submit a connection application to Ausgrid as soon as practicable. Visit the Ausgrid website for further details; https://www.ausgrid.com.au/Connections/Get-connected</p>	<p>Noted.</p>

Issue Raised	Response
<p>Additional information can be found in the Ausgrid Quick Reference Guide for Safety Clearances "Working Near Ausgrid Assets - Clearances". This document can be found by visiting the following Ausgrid website: www.ausgrid.com.au/Your-safety/Working-Safe/Clearance-enquiries</p>	
<p>Sydney Airport</p>	
<p>This location lies within an area defined in schedules of the Civil Aviation (Buildings Control) Regulations which limit the height of structures to 15.24 metres above existing ground height (AEGH) without prior approval of the Civil Aviation Safety Authority. The application sought approval for the PROPERTY DEVELOPMENT to a height of 33.20 metres Australian Height Datum (AHD).</p> <p>In my capacity as Manager, Airfield Spatial & Technical Planning and an authorised person of the Civil Aviation Safety Authority (CASA) under Instrument Number: CASA 229/11, in this instance, I have no objection to the erection of this development to a maximum height of 33.20 metres AHD.</p> <p>The approved height is inclusive of all lift over-runs, vents, chimneys, aerials, TV antennae, construction cranes etc. Should you wish to exceed this height a new application must be submitted.</p>	<p>Noted.</p>
<p>Temporary structure heights</p> <p>Should the height of any temporary structure and/or equipment be greater than 15.24 metres AEGH, a new approval must be sought in accordance with the Civil Aviation (Buildings Control) Regulations Statutory Rules 1988 No. 161.</p> <p>Construction cranes may be required to operate at a height significantly higher than that of the proposed development and consequently, may not be approved under the Airports (Protection of Airspace) Regulations.</p> <p>Sydney Airport advises that approval to operate construction equipment (ie cranes) should be obtained prior to any commitment to construct.</p>	<p>Noted.</p>

5. UPDATED PROJECT JUSTIFICATION

This section provides an updated justification and evaluation of the project as a whole, having regard to its economic, environmental and social impacts, including the principles of ecologically sustainable development.

5.1. PROJECT DESIGN

The design of the proposal has been carefully developed to minimise potential impacts while supporting the continued use of the site for industrial and commercial purposes. It delivers a state-of-the-art, employment-generating development in a highly accessible and strategically located setting.

As part of this Submissions Report package, a series of minor refinements have been made to improve the proposal's accessibility and functionality. These include adjustments to driveway widths and gradients, removal of a traffic island, and enhancements to the design and location of bicycle parking. In addition, a small number of technical and design documents have been updated to incorporate revised modelling and provide further clarification where necessary.

Overall, the layout and design of the proposal have been carefully considered to minimise impacts on neighbouring properties, the surrounding road network, and existing onsite vegetation. The development continues to respond to both the existing and emerging character of the area, contributing positively to the streetscape.

A number of alternative designs were explored through a competitive design alternatives process, undertaken to ensure the proposed warehouse and distribution centre achieves design excellence. Although the scheme has been reduced by one level, it has been reviewed by the Design Integrity Panel, who confirmed it achieves 'design excellence' and remains 'substantially the same' as the competition-winning scheme.

The proposal also delivers a significant uplift in landscaping and planting across the site. Where mitigation measures are proposed, they will ensure the development can be constructed and operated without unacceptable economic, social, or environmental impacts.

5.2. STRATEGIC CONTEXT

The proposal is consistent with State and local strategic planning policies. The site is highly suitable for the proposed development, located within the established Southern Employment Lands industrial precinct. It delivers additional industrial floorspace within an appropriate land use zone, supporting employment growth targets by providing over 400 operational jobs.

The generation of new employment in the Eastern City Region contributes to the 30-minute city vision outlined in the Region Plan. The proposal provides a range of job opportunities benefiting both the local community and broader Sydney region. It also aligns with the sustainability objectives of Sustainable Sydney 2030–2050: Continuing the Vision, achieving a 5-star Green Star rating and 5.5-star NABERS office rating.

5.3. STATUTORY CONTEXT

The proposal continues to comply with the relevant provisions of the applicable planning instruments, as summarised below:

- The development has been assessed and designed in respect of the objects of the EP&A Act, as defined in Section 1.3 the Act.
- The submitted EIS was prepared in accordance with the SEARs, consistent with Schedule 2 of the EP&A Regulation.
- Relevant matters under the Biodiversity Conservation Act have been considered, with the Amendment Report supported by a BDAR Waiver Request.
- This SSDA pathway has been undertaken in accordance with Chapter 2 of the SEPP (Planning Systems), as the proposed development is appropriately classified as SSD.
- TfNSW has been consulted in accordance with the SEPP (Transport and Infrastructure), with their latest referral (dated 20 February 2025) confirming general support.

- The proposal complies with the applicable provisions of SLEP 2012 and is consistent with the objectives of the E4 (General Industrial) zone.
- The development has been assessed against Chapters 3 and 4 of SEPP Resilience and Hazards and complies with the relevant clauses.
- The proposal generally complies with the relevant provisions of the SDCP 2012, including those relating to deep soil planting and tree canopy cover.

5.4. COMMUNITY VIEWS

As outlined in Section 4, feedback received during the most recent public exhibition has informed several refinements to the project design. Any additional feedback received during the finalisation and assessment of the application will also be considered.

5.5. LIKELY IMPACTS OF THE PROPOSAL

The likely impacts of the development, including environmental, social, and economic, on both the natural and built environments were assessed in the EIS and Amendment Report.

For each key issue identified, the assessment demonstrates that impacts will either be positive or can be appropriately mitigated. While some technical reports have been updated as part of this Submissions Report, no changes are required to the submitted Table of Mitigation Measures (Appendix D of the Amendment Report, dated December 2024).

5.6. SUITABILITY OF THE SITE

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

- The warehouse and distribution centre use is permitted within the E4 (General Industrial) zone and aligns with the zone objectives by enabling a broad range of industrial and warehouse activities, supporting employment, and minimising impacts on surrounding land uses.
- The development addresses the relevant provisions of SLEP 2012 and SDCP 2012, including acoustic amenity, built form, setbacks, car parking, and landscaping. It complies with key built form controls, including building height and floor space ratio.
- The site is located within an established industrial area, and the scale and character of the proposal are compatible with the surrounding context, avoiding unacceptable impacts on residential amenity.
- The site benefits from strong connections to the transport network, regional freight routes, and the rail network, and represents the sustainable redevelopment of a brownfield site.

5.7. PUBLIC INTEREST

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

- It is consistent with relevant State and local strategic plans and satisfies applicable planning controls.
- It will not result in any adverse environmental, social, or economic impacts.
- It will generate approximately 684 construction jobs and over 425 ongoing operational jobs.
- It will stimulate local investment and deliver substantial annual economic output and value-add to the economy.
- The project is fully funded and 'shovel ready', enabling construction to commence promptly following approval.
- Issues raised during stakeholder engagement have been addressed through the design process and impact assessment.

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

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