

21 July 2026

TfNSW Reference: SYD25-00598/04
DPHI Reference: SSD-84467726



Ms. Kiersten Fishburn
Secretary
Department of Planning, Housing, and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Attention: Patrick Copas

**ENVIRONMENTAL IMPACT STATEMENT
KOGARAH GOLF CLUB REDEVELOPMENT – CONCEPT & EARLY WORKS
13-19A MARSH STREET, ARNCLIFFE**

Dear Ms. Fishburn,

Thank you for inviting Transport for NSW (**TfNSW**) to review and comment on the Environmental Impact Statement (**EIS**) for the abovementioned State Significant Development application (**SSDA**).

TfNSW appreciates the opportunity to provide comment on the EIS and provides advisory comments and recommended conditions for the Department of Planning, Housing and Infrastructure's (**DPHI**) consideration in **Appendix A**.

TfNSW notes that the subject development is proposed over land that is owned by TfNSW, as detailed at Appendix A. TfNSW's Landowner's Consent must be obtained prior to the determination of the application and commencement of any development works on TfNSW owned land. TfNSW is separately liaising with the developer in relation to their request for TfNSW's Land Owner's Consent.

Further to the above, due to the interfaces between the SSDA and the M8 and M6 Stage 1 project site, TfNSW would be willing to meet with the relevant DPHI teams to discuss the potential implications of the SSDA on the M8 and M6 Stage 1 project in more detail.

If you have any further inquiries in relation to this matter, please contact Shengxi Lin, Development Assessment Officer, via email at development.sydney@transport.nsw.gov.au

Yours sincerely,

A handwritten signature in black ink, appearing to read "Aleks Tancevski".

Aleks Tancevski
Senior Manager Complex Development Services Planning
Transport Planning Branch
Planning, Integration and Passenger

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Appendix A – TfNSW advisory comments and recommended conditions

1. Development and Access over TfNSW Owned/Occupied land

Comment:

- a) The subject development is within the construction area for the M6 Stage 1 project and operational area for the M8. The surface Lots 62 & 63 DP 1301057 and subsurface land Lot 65 DP 1301057 have been compulsorily acquired by TfNSW for M6 Stage 1 project. Please refer to DP 1301057 attached at **TAB A**.

Subsurface land beneath the subject area has been compulsorily acquired by TfNSW to enable construction of the tunnels for both the M8 and the M6 Stage 1 project, as shown by red colour in the Aerial – “Y” of **TAB B**.

An area of land required by the M6 Stage 1 project is subject to a construction lease as shown by green hatching on the Aerial – “Z” of **TAB B**.

- b) The proposed ‘Early Works’ appear to be partly over land owned by TfNSW, including Lot 62 DP 1301057, as shown by blue colour on the Aerial – “X” of **TAB B**.

TfNSW’s Landowner’s Consent shall be obtained prior to the determination of the application and commencement of any development works on TfNSW owned land, as required under Section 23 of the *Environmental Planning and Assessment Regulation 2021*.

TfNSW is separately liaising with the developer in relation to their request for TfNSW’s Land Owner’s Consent.

2. M8/M6 Stage 1 and Motorway Operations Complex (MOC) Impacts

Comment:

- a) TfNSW notes that the ‘Early Works’ proposed under this SSDA include works within the Lot 60 & Lot 61 DP 1301057, which are under the ownership of Council and currently leased by TfNSW for M6 Stage 1 project. Also, the submitted Traffic Impact Assessment states that *“Initially it is envisaged that construction vehicles will utilise the existing Marsh Street / Flora Street signalised intersection and share this access point with vehicles associated with the Arncliffe MOC. Appropriate arrangements will be made between the head contractor for the site and TfNSW to ensure suitable access is maintained to the Arncliffe MOC at all times during the construction works.”*

TfNSW appreciates the ongoing consultation occurring with the M6 Stage 1 Project team in relation to the proposed development. TfNSW requests consultation with the M6 Stage 1 Project team on elements that may impact existing and proposed M6 Stage 1 facilities and sites and M6 Stage 1 planning approval compliance requirements continues during construction planning and design development for the SSDA.

- b) From Table 11 (page 67) of the EIS, prepared by Colliers Urban Planning dated 9 June 2026, it is understood that the ‘Early Works’ outlined with the indicative delivery timeframe of 2028-2029 (18 months) include creation of an overland flow path outside of the development area. Figures 37/38 indicate that the overland flow path traverses through Lot 60 DP 1301057, which is owned by Council and currently partially occupied by TfNSW for the M6 Stage 1 construction compound under a lease agreement. The proposed Bulk Earthworks Plans should be updated to indicate the location of M6 Stage 1 construction compound and demonstrate that the overland flow path can be delivered during the proposed indicative delivery timeframe without encroaching into the M6 Stage 1 construction compound.

- c) The development must not compromise the ability of the M8 project to comply with its Conditions of Approval (SSI 6788). In this regard the following comments are provided for DPHI’s consideration in its assessment and determination of the SSDA:

- Based on the review of the EIS material, specifically in relation to the Green and Golden Bell Frog (**GGBF**) and the existing approval framework for SSI 6788 (WestConnex Stage 2 – New M5 / M8), there appears to be a potential inconsistency between the SSDA and the ongoing biodiversity obligations that apply to the M8 project for the Arncliffe GGBF population at Kogarah Golf Course.

SSI 6788 Conditions B14–B19 require the M8 project to continue implementing an approved management framework for the Arncliffe population, including:

- Ongoing adaptive monitoring of the population at Kogarah Golf Course.
- Performance criteria and contingency measures in the event of population decline.
- Additional offset measures if mitigation actions are unsuccessful.

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- Release of captive-bred frogs into Kogarah Golf Course if the population becomes extinct.
- Investigation of translocation if reintroduction efforts are unsuccessful.

The key concern is that the redevelopment proposal may remove, modify, fragment or otherwise reduce the functionality of habitat at Kogarah Golf Course to the extent that the existing SSI 6788 approval requirements may no longer be capable of being implemented as approved.

In particular, if the Arncliffe population declines further or becomes locally extinct as a consequence of the redevelopment, several approval and compliance issues may arise:

- **Condition B14** – The approval requires ongoing monitoring and performance assessment of the Arncliffe population at Kogarah Golf Course. If the habitat is substantially altered or no longer available in its current form, it is unclear how this condition could continue to be meaningfully implemented.
- **Conditions B15 and B18** – The approval framework contemplates the release of captive-bred frogs into breeding ponds at Kogarah Golf Course if the population becomes extinct. If the relevant habitat is removed or rendered unsuitable, the approved release pathway may become unworkable.
- **Conditions B16 and B17** – If the population experiences an adverse change or local extinction, the M8 project could be required to implement corrective actions or additional offsets, even where the decline may be attributable to impacts from a separate development.
- **Approval interaction risk** – The issue extends beyond site-specific ecological impacts. The redevelopment may affect the M8 project's ability to continue complying with its existing biodiversity approval obligations for the Arncliffe GGBF population.

The current EIS does not appear to adequately assess this interaction or demonstrate how SSI 6788 Conditions B14–B19 would continue to operate if the proposed development proceeds in its current form. As a result, there is a risk that the SSDA could undermine the approved biodiversity management framework for the Arncliffe population.

Due to the interfaces between the SSDA and the M6 Stage 1 project and M8 site, it is essential that these sites are considered together to ensure high quality urban design and public space outcomes. The plans across these sites should be coordinated to achieve this. TfNSW is willing to meet with the relevant DPHI teams to discuss the potential implications of the subject SSD on the M8 and M6 Stage 1 project, outlined above, in more detail.

Recommended conditions:

- Prior to the issue of a Construction Certificate for any works that may impact the M8 (and future M6) assets, the developer must enter into an Interface Agreement with the Motorway Trustees (e.g. WestConnex/Transurban) and TfNSW.
- Permanent and full-time access for TfNSW, its contractors and Motorway Trustees, to the Arncliffe MOC facilities, during construction and post-construction in perpetuity shall be maintained.

3. Advertising Structures Land Use

Comment:

TfNSW notes that the proposed Concept Masterplan includes provision for advertising structures on Lot 31 DP121486 and a preliminary signage safety assessment is provided as part of the Transport Impact Assessment prepared by JMT Consulting dated 19 March 2026. It is understood that the proposed future advertising structure would be visible to westbound traffic travelling across the Giovanni Brunetti Bridge. It is noted that the proposed Concept Masterplan does not seek approval (under the subject SSDA) for the construction of an advertising structure or display of an advertisement; design and operational details of the advertising structure and/or display content would be confirmed as part of a future detailed development application for the signage.

TfNSW advises that any future signage proposal should be designed and assessed in accordance with the NSW *Transport Corridor Outdoor Advertising and Signage Guidelines, 2017 (the Guidelines)* and Schedule 5 of the *State Environmental Planning Policy (Industry and Employment) 2021 (the SEPP)*. A detailed signage safety assessment prepared by a suitably qualified person or company should be provided in support of any future detailed development application for the signage. The concurrence of the Development Coordination Authority would be required for the future detailed development application in accordance with Section 4.29 of the *State Environmental Planning Policy (Planning Systems) 2021* (provided that the Minister for Planning and Public Spaces/DPHI would not be the relevant consent authority and that the size and location criteria under Section 4.29 are met).

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4. Transport Impact Assessment (TIA)

Comment:

TfNSW has reviewed the TIA prepared by JMT Consulting dated 19 March 2026, provided in support of the SSDA, and provides the following advisory comments for DPHI's consideration in its assessment and determination of the SSDA:

- a) Section 5.2, page 30 of the TIA states that “*Vehicle swept paths prepared by Costin Roe for the internal street network are provided as Appendix A of this document.*” Appendix A includes swept paths prepared by Enspire Solutions for the Marsh Street intersection upgrades. It is recommended that swept paths in Appendix A are provided for the internal street network to demonstrate accessibility for the design and check vehicles. TfNSW has provided feedback on the Marsh Street intersection designs and vehicle swept paths in response to the separate Road Works DA (DA-2026/50) and has been liaising with the developer in relation to the design refinements required to address TfNSW comments previously provided on those designs.
- b) TfNSW notes that development consent for the ultimate vehicular access arrangements to support the subject SSD/Concept Masterplan is being sought under a separate DA (DA-2026/50) and is intended to reflect the access arrangements on Marsh Street agreed under the State Voluntary Planning Agreement (**VPA**) executed on 7 January 2025 between TfNSW and Cook Cove Nominees No 1 Pty Ltd and Cook Cove Nominees No 2 Pty Ltd (SVPA2024-25). TfNSW highlights that the executed State VPA requires the (ultimate) Marsh Street intersection works and bus stop works to be delivered prior to the issue of the first Occupation Certificate for GFA within the ‘Developer Land’ (arising from the Instrument Change).

5. Construction Access and Traffic Impacts

Comment:

Construction traffic impacts for the proposed ‘Early Works’ will need to be carefully managed and coordinated to ensure impacts on the road network and the M6 Stage 1 project are managed and mitigated.

Recommended conditions:

- A Construction Pedestrian Traffic Management Plan (**CPTMP**) detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to Council and TfNSW for review and endorsement prior to the issue of a construction certificate.
- A Road Occupancy Licence (**ROL**) should be obtained from Transport Management Centre (**TMC**) for any works that may impact on traffic flows on Marsh Street during construction activities. A ROL can be obtained through <https://myrta.com/oplinc2/pages/security/oplincLogin.jsf>.

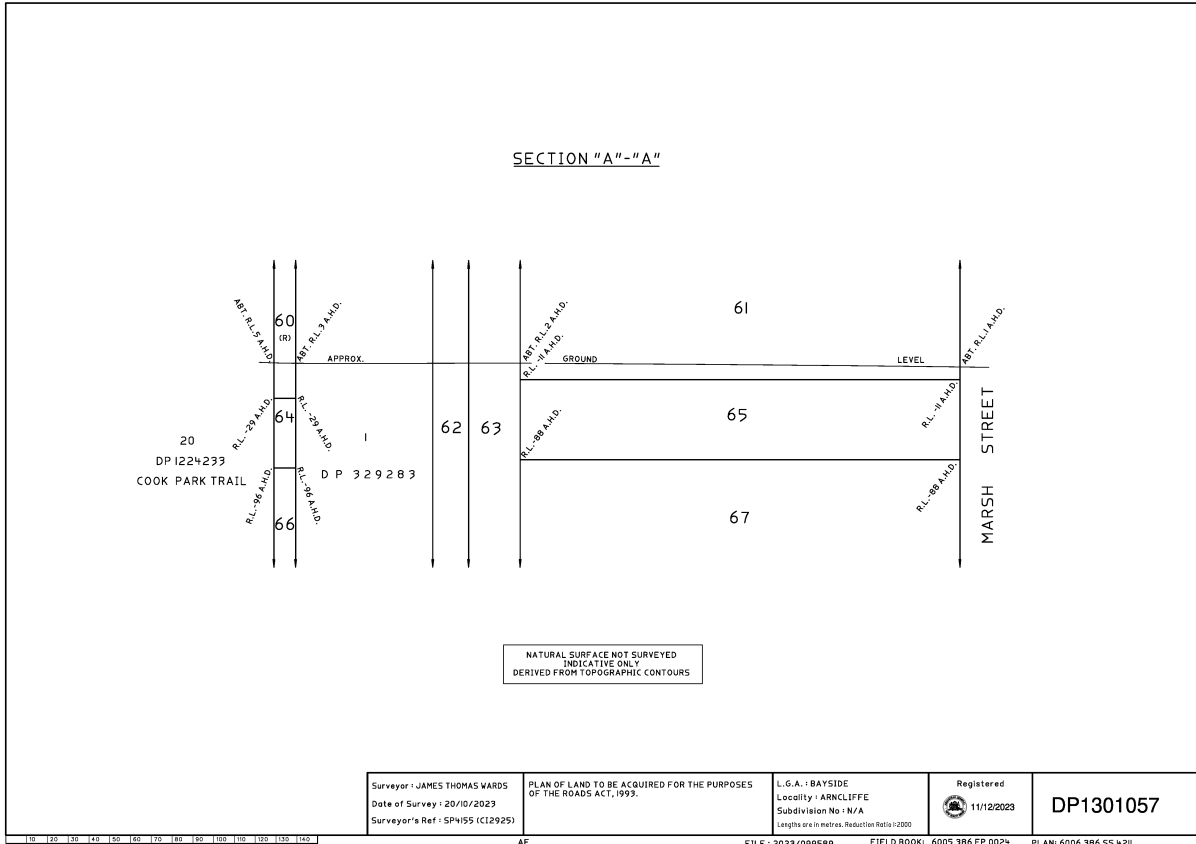
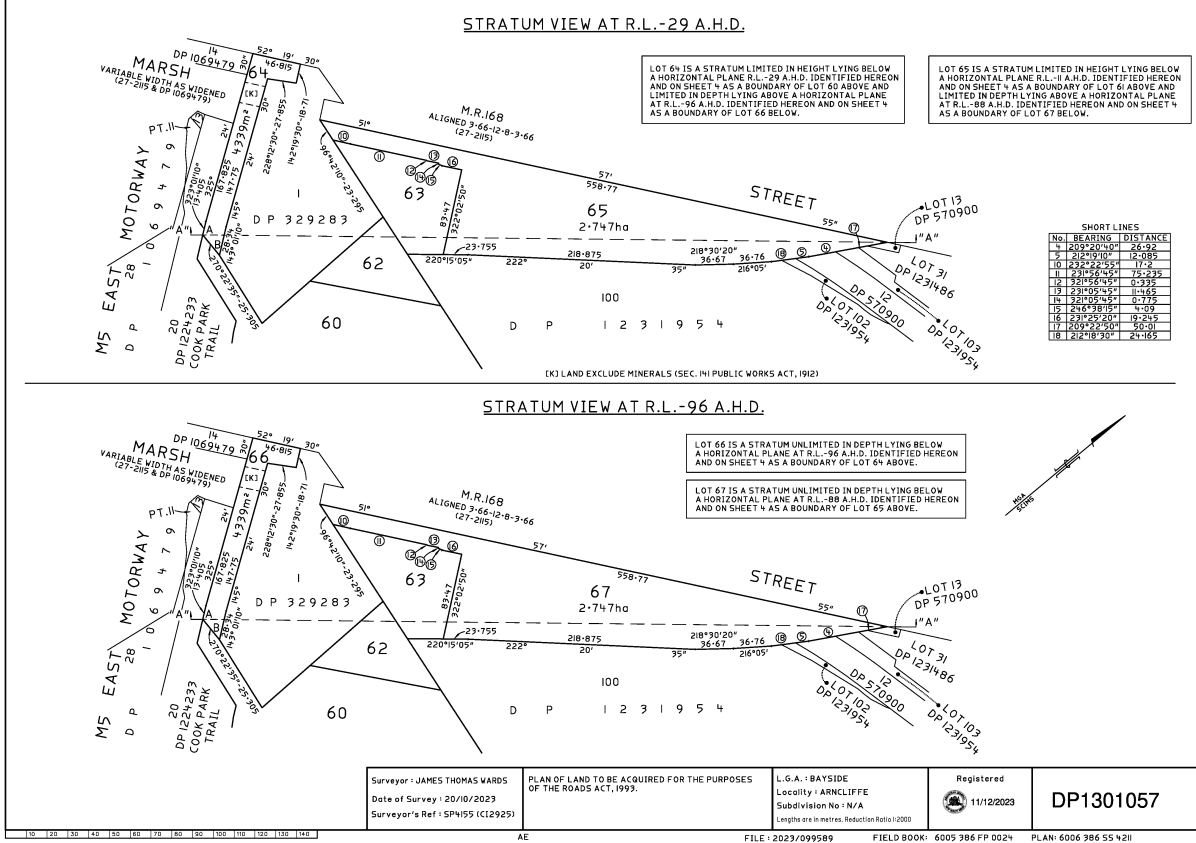
6. Building Envelope Block 3A

Comment:

It is noted from the Building Envelope Drawings, prepared by Grimshaw dated 25 March 2026, that the proposed building envelope for Block 3A is in close proximity to the site's property boundary shared with Lot 61 DP 1301057 which accommodates the M6 Stage 1 tunnel in substratum and the temporary tunnel access decline. Given that the building envelope may be <10m from the tunnel alignment, the future development may be within the zone of influence and the development application for Block 3A (SSD-84608232) should be referred to TfNSW for comment in due course on the potential impacts/assessment requirements in relation to the tunnel infrastructure.

The developer should be aware of exclusion zones and easements in place to protect tunnel infrastructure.

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TAB B – TfNSW Property Aerials



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