



# LIGHT HORSE INTERCHANGE BUSINESS HUB

Scoping Report

Prepared for  
**WOOLWORTHS GROUP LIMITED**  
30 September 2022



**URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:**

|                    |                  |
|--------------------|------------------|
| Director           | Jennifer Cooper  |
| Associate Director | Danielle Blakely |
| Senior Consultant  | Alicia Desgrand  |
| Consultant         | Kirraly Northey  |
| Project Code       | P0041094         |
| Report Number      | Final            |

---

**Urbis acknowledges the important contribution that Aboriginal and Torres Strait Islander people make in creating a strong and vibrant Australian society.**

**We acknowledge, in each of our offices, the Traditional Owners on whose land we stand.**

All information supplied to Urbis in order to conduct this research has been treated in the strictest confidence. It shall only be used in this context and shall not be made available to third parties without client authorisation. Confidential information has been stored securely and data provided by respondents, as well as their identity, has been treated in the strictest confidence and all assurance given to respondents have been and shall be fulfilled.

© Urbis Pty Ltd  
50 105 256 228

All Rights Reserved. No material may be reproduced without prior permission.

You must read the important disclaimer appearing within the body of this report.

**[urbis.com.au](http://urbis.com.au)**

# CONTENTS

|   |           |
|---|-----------|
| <b>Glossary and Abbreviations</b> .....                               | <b>1</b>  |
| <b>1. Introduction</b> .....  | <b>3</b>  |
| 1.1. Applicant Details .....  | 3         |
| 1.2. Project Description .....  | 3         |
| 1.2.1. Operational Details .....                                      | 4         |
| 1.2.2. Concurrent Modifications .....                                 | 6         |
| 1.3. Project Background .....   | 6         |
| 1.3.1. Site History .....   | 6         |
| 1.3.2. Likely Future Strategies .....                                 | 6         |
| 1.4. Related Development .....  | 7         |
| <b>2. Strategic Context</b> .....                                     | <b>10</b> |
| 2.1. Project Justification .....                                      | 10        |
| 2.1.1. NSW State Priorities .....                                     | 10        |
| 2.1.2. Greater Sydney Region Plan: A Metropolis of Three Cities ..... | 10        |
| 2.1.3. Our Greater Sydney 2056: Central City District Plan .....      | 10        |
| 2.1.4. Blacktown Local Strategic Planning Statement 2020 .....        | 11        |
| 2.2. Relevant Plans .....   | 11        |
| 2.3. Key Features of Site and Surrounds .....                         | 12        |
| 2.4. Cumulative Impacts with Future Projects .....                    | 14        |
| 2.5. Agreements with Other Parties .....                              | 15        |
| <b>3. Project</b> .....   | <b>16</b> |
| 3.1. Proposed Development .....                                       | 16        |
| 3.2. Feasible Alternatives .....                                      | 17        |
| <b>4. Statutory Context</b> .....                                     | <b>19</b> |
| 4.1. Statutory Requirements .....                                     | 19        |
| 4.2. Pre-Conditions .....   | 20        |
| 4.3. Mandatory Considerations .....                                   | 21        |
| <b>5. Community Engagement</b> .....                                  | <b>23</b> |
| <b>6. Proposed Assessment of Impacts</b> .....                        | <b>25</b> |
| 6.1. Matters Requiring Further Assessment in the EIS .....            | 25        |
| 6.1.1. Built Form and Urban Design .....                              | 25        |
| 6.1.2. Landscaping .....  | 25        |
| 6.1.3. Visual Impacts .....   | 25        |
| 6.1.4. Transport, Traffic and Parking .....                           | 26        |
| 6.1.5. Noise and Vibration .....                                      | 29        |
| 6.1.6. Air Quality .....  | 29        |
| 6.1.7. Stormwater and Water Quality .....                             | 29        |
| 6.1.8. Hazards and Risks .....  | 30        |
| 6.1.9. Infrastructure Requirements .....                              | 30        |
| 6.1.10. ESD .....   | 31        |
| 6.1.11. Economic Impacts .....  | 31        |
| 6.1.12. Access .....  | 31        |
| 6.1.13. Waste .....   | 31        |
| 6.2. Matters Requiring No Further Assessment in the EIS .....         | 31        |
| <b>Disclaimer</b> .....   | <b>36</b> |
| <b>Appendix A</b> <b>QS Report</b>                                    |           |
| <b>Appendix B</b> <b>Architectural Plans</b>                          |           |
| <b>Appendix C</b> <b>Scoping Report Summary Table</b>                 |           |

## FIGURES

|   |    |
|---|----|
| Figure 1 Photomontage of the Proposal Viewed from the South Western Aspect of the Site (Source: Watson Young Architects and Morphmedia, 2022) ..... | 5  |
| Figure 2 Photomontage of the Proposal Viewed from the Northern Aspect of the Site (Source: Watson Young Architects and Morphmedia 2022) .....       | 5  |
| Figure 3 Indicative Layout for Mod 2 (Source: Nettleton Tribe, 2022) .....  | 8  |
| Figure 4 Indicative Layout for Mod 3 (Source: Nettleton Tribe, 2022) .....  | 9  |
| Figure 5 LHIBH Site Location (source: Urbis, 2022) .....  | 12 |
| Figure 6 Proposed Development Perceived from the M4 Motorway (Source: Watson Young Architects and Morphmedia, 2022).....                            | 26 |
| Figure 7 View of Proposed Development from Nearby Overpass (Source: Watson Young Architects and Morphmedia, 2022).....                              | 26 |

## TABLES

|   |    |
|---|----|
| Table 1 Applicant Details .....   | 3  |
| Table 2 Legal Description of Site.....  | 3  |
| Table 3 Key Features of Site and Locality .....   | 12 |
| Table 4 Surrounding Projects .....  | 14 |
| Table 5 Project Details.....  | 16 |
| Table 6 Analysis of Feasible Alternatives .....   | 17 |
| Table 7 Identification of Statutory Requirements for the Project.....                     | 19 |
| Table 8 Pre-Conditions .....  | 20 |
| Table 9 Mandatory Considerations.....   | 21 |
| Table 10 Car Parking Requirements .....   | 27 |
| Table 11 Traffic Generation and Breakdown (Source: TTPA Preliminary Analysis, 2022) ..... | 28 |

## MAPS

|                              |   |
|------------------------------|---|
| Map 1 Regional Context ..... | 4 |
|------------------------------|---|

# GLOSSARY AND ABBREVIATIONS

| Reference             | Description  |
|-----------------------|--|
| ACHAR                 | Aboriginal Cultural Heritage Assessment Report                       |
| BAM                   | Biodiversity Assessment Method                                       |
| BC Act                | <i>Biodiversity Conservation Act 2016</i>                            |
| BDAR                  | Biodiversity Development Assessment Report                           |
| BDCP 2015             | Blacktown Development Control Plan 2015                              |
| Charter Hall          | Charter Hall Group Pty Ltd   |
| Council               | Blacktown City Council   |
| CPIF                  | Charter Hall's Wholesale Industrial and Logistics Fund               |
| DCP                   | Development Control Plan   |
| DPE                   | NSW Department of Planning and Environment                           |
| EP&A Act              | <i>Environmental Planning and Assessment Act 1979</i>                |
| EPA Regulation        | <i>Environmental Planning and Assessment Regulation 2021</i>         |
| EPBC Act              | <i>Environment Protection and Biodiversity Conservation Act 1999</i> |
| EIS                   | Environmental Impact Statement                                       |
| EPA                   | NSW Environment Protection Authority                                 |
| FFL                   | Finished Floor Level   |
| GFA                   | Gross Floor Area   |
| LEP                   | Local Environmental Plan   |
| LGA                   | Local Government Area  |
| LHIBH                 | Light Horse Interchange Business Hub                                 |
| LSPS                  | Local Strategic Planning Statement                                   |
| Planning Systems SEPP | <i>State Environmental Planning Policy (Planning Systems) 2021</i>   |
| POM                   | Plan of Management   |
| RAP                   | Remediation Action Plan  |
| SEARs                 | Secretary's Environmental Assessment Requirements                    |
| SEPP                  | State Environmental Planning Policy                                  |

| <b>Reference</b> | <b>Description</b>                          |
|------------------|---|
| Site             | Lot 10 in DP 1061237 and Lot 5 in DP 804051 |
| SSD              | State Significant Development               |
| SSDA             | State Significant Development Application   |
| TIA              | Traffic Impact Assessment                   |
| WMP              | Waste Management Plan                       |
| WSPT             | Western Sydney Parklands Trust              |
| NDA              | Net Developable Area                        |
| VIA              | Visual Impact Assessment                    |

# 1. INTRODUCTION

This Scoping Report has been prepared on behalf of Woolworths Group Limited (**Woolworths**) to provide a detailed outline of the proposed Chilled and Fresh Distribution Centre at the Light Horse Interchange Business Hub (**LHIBH**) at 165 Wallgrove Road and 475 Ferrers Road, Eastern Creek (**the site**).

The report seeks Secretary's Environmental Assessment Requirements (**SEARs**) from the Department of Planning and Environment (**DPE**) for the preparation of an Environmental Impact Statement (**EIS**) that will accompany a State Significant Development Application (**SSDA**).

Separate applications are being prepared by the long-term leaseholder, Charter Hall Group Pty Ltd (**Charter Hall**) to facilitate concurrent assessment of amendments to the Concept DA approval (SSD-9667 dated 31 August 2020). The amendments seek to modify the approved subdivision, building envelope and gross floor area (**GFA**) to facilitate delivery of the development sought by Woolworths as outlined in this report.

The following sections identify the applicant for the project and describe the site and proposed development. It outlines the site history and feasible alternatives explored in the development of the proposed concept, including key strategies to avoid or minimise potential impacts.

## 1.1. APPLICANT DETAILS

The applicant details for the proposed development are listed in the following table.

Table 1 Applicant Details

| Descriptor        | Proponent Details  |
|-------------------|--|
| Full Name(s)      | Woolworths Group Limited                                 |
| Postal Address    | 1 Woolworths Way, Bella Vista NSW 2153                   |
| ABN               | 88 000 041 675   |
| Nominated Contact | Thomas Stock – Regional Development Manager – Non-Retail |
| Contact Details   | 0404 077 930 or tstock@woolworths.com.au                 |

## 1.2. PROJECT DESCRIPTION

It is proposed to lodge a SSDA seeking development consent for the construction and operation of a two-storey 'warehouse or distribution centre' on Proposed Lot 2 in the south-western part of the LHIBH site.

The proposed development has an estimated capital investment value of \$373,400,333 (refer to **Appendix A**). Accordingly, the proposal is classified as an SSD under clause 5 in Schedule 2 of *State Environment Planning Policy (Planning Systems) 2021 (Planning Systems SEPP)*. The Minister is the consent authority for the proposal in accordance with section 4.5 of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*. Accordingly, the proposal is being lodged as an SSDA.

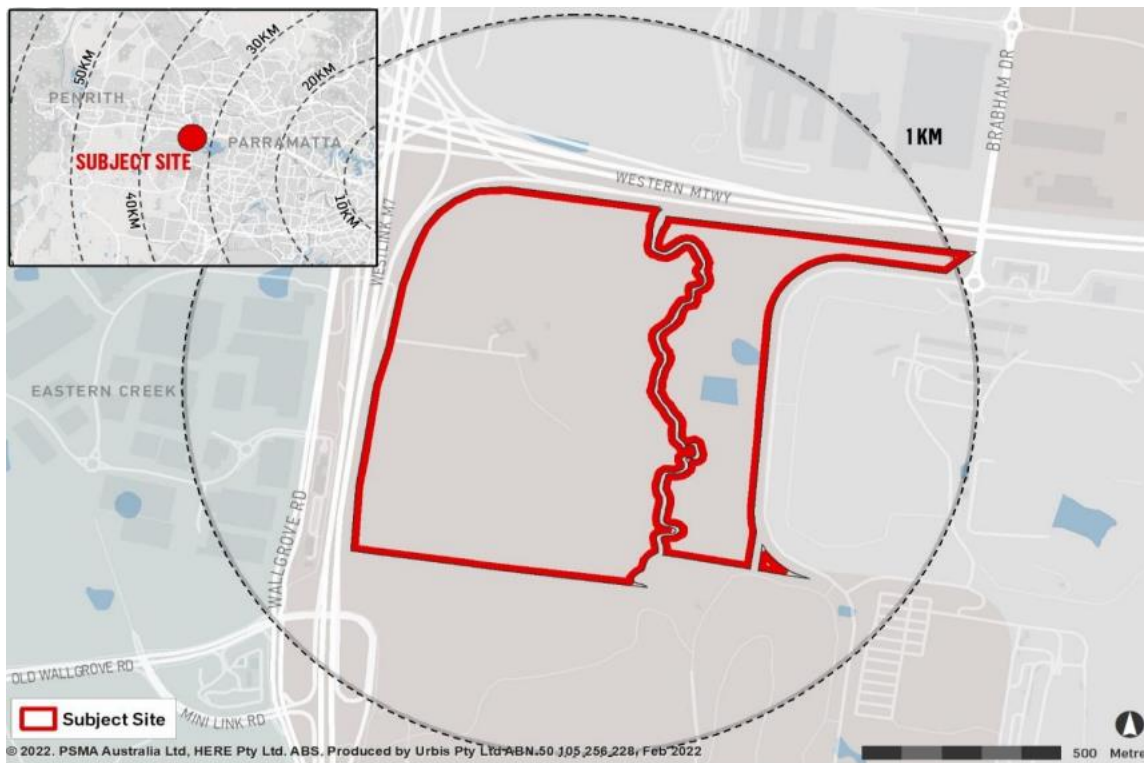
The site information relevant to the project is provided in the following table. A detailed description of the key features of the site and locality is provided in **Section 2.3** of this report.

Table 2 Legal Description of Site

| Descriptor        | Site Details   |
|-------------------|--|
| Street Address    | 165 Wallgrove Road and 475 Ferrers Road, Eastern Creek |
| Legal Description | Lot 10 in DP 1061237 and Lot 5 in DP 804051            |
| Site Area         | 39.38 hectares   |

A map of the site in its regional setting is provided as **Figure 1**.

Map 1 Regional Context



## 1.2.1. Operational Details

### Proposal Details

It is proposed to lodge a SSDA seeking development consent for the construction and operation of a two-storey 'warehouse or distribution centre' on Proposed Lot 2 in the south-western part of the LHIBH site.

The proposal will be a multi-level, manually operated site that will function as an intermediary in Woolworths supply chain, connecting suppliers to customers. It will receive goods, store and process these goods and then facilitate their distribution to Woolworths stores located in the broader NSW region.

The proposal is aligned with Woolworths' Supply Chain Strategy. All operational processes incorporate state-of-the-art technology and have been prepared based on anticipated 'Year 2027 Forecast Operational Volumes' and 'Year 2027 Employment Forecasts'.

Growth of 1.45% is anticipated for the subject facility before reaching a maximum operational volume in 2042, when the facility would be operating at or beyond capacity for present industry best work practices.

### Project Rationale

The rationale for the proposal is to support Woolworths business growth strategy whilst optimising its NSW Chilled and Fresh network. The NSW Chilled and Fresh network is growing in complexity and are unable to be serviced by the existing Minchinbury Chilled facility. In particular, in excess of 230,000 cartons per week are handled via less efficient external 3PL operations.

The overflow volume is serviced by AMC Arndell Park, which will reach maximum operational capacity by 2023. Transport and distribution centre costs and store deliverables have increased and are expected to increase with an additional overflow facility and volume post 2023. The combination of these factors are impacting store servicing levels. Further, the current Sydney Temperature Controlled / Fresh Supply Chain is unable to support Woolworths business range expansion strategy.

This proposal seeks to respond to the current Supply Chain and broader business requirements. It seeks to establish a co-located Fresh and Chilled operation in Eastern Creek with a planned go live date of February 2026 and design year of FY42, subject to internal 'Corporate Advisory Services' and 'Board Approval'.

The proposal will deliver benefits for Woolworths stores and customers, including:

- Increased range and range flexibility to support the customer first strategy.
- Improved cold chain integrity improving quality and freshness of products as well as reduced shrinkage.
- Reduced lead time with fewer touch points and enhanced capability to support flow-through activity increasing freshness and reducing supply costs.
- Capability from the outset to utilise ⅔ pallets, making things simpler for stores.
- Reduction in store deliveries by consolidating Fresh with Chilled, making things simpler for stores.
- Greater capacity supporting promotional stock builds, on shelf availability and peak demand.
- Reduced transport movements.
- Greater capacity to support business growth.

Indicative photomontages of the proposal are provided in **Figure 1** and **Figure 2** below.

Figure 1 Photomontage of the Proposal Viewed from the South Western Aspect of the Site (*Source: Watson Young Architects and Morphmedia, 2022*)



Figure 2 Photomontage of the Proposal Viewed from the Northern Aspect of the Site (*Source: Watson Young Architects and Morphmedia 2022*)



## 1.2.2. Concurrent Modifications

The SSDA is to be lodged concurrently with two separate applications to modify the current approval (SSD-9667) to facilitate amendments to the original Concept Proposal and Stage 1 Detailed Proposal including:

- SSDA-9667 Modification 2: to modify the approved subdivision layout to reflect the preferred layouts for Buildings 1 and 5, which will be subject to a separate SSDA; and
- SSDA-9667 Modification 3: to modify the approved building envelope, subdivision layout and GFA to facilitate delivery of the warehouse or distribution centre development required by Woolworths to meet its operational needs.

The Modification Applications for the amendment of the current Concept DA (SSD-9667) will be lodged by Charter Hall and concurrently with the new SSDA by Woolworths. Further discussion regarding these applications is provided in **Section 1.4**.

## 1.3. PROJECT BACKGROUND

### 1.3.1. Site History

A SSDA for the LHIBH was lodged by Western Sydney Parklands Trust (**WSPT**) in July 2019. The application was lodged as a Concept DA, seeking consent for up to 165,500m<sup>2</sup> of GFA for warehouse or distribution centre and light industrial uses with ancillary offices. It also included a Stage 1 detailed proposal for the delivery of the site preparation works and industrial subdivision.

The development approved within the Concept DA forms an important component of the self-funded model for the WSPT. This includes the delivery of business hubs on the perimeter of the WSP in areas of low conservation or recreation value and close to established employment areas and the metropolitan road network. The business hubs remain in public ownership and are occupied on a leasehold basis, providing ongoing income for the WSPT to ensure its financial suitability and enable the effective management of the Parklands.

Charter Hall's wholesale industrial and logistics fund (**CPIF**) acquired the leasehold interest in the LHIBH from the WSPT via an open market tender process. The transaction was approved and executed by the NSW Minister for Planning and Public Spaces on 19 May 2021.

Each of the approved warehouse or distribution centre developments will be subject to a 90-year Ground Lease, providing WSPT with ongoing funds to facilitate the continued operation, maintenance and improvements to the Western Sydney Parklands (**WSP**) in accordance with the Plan of Management and as outlined in detail within the EIS.

### 1.3.2. Likely Future Strategies

The conditions within the Concept DA approval establish the following key strategies to avoid, minimise or off-set the impacts of the project:

- Provision of on-site car parking in accordance with RMS rates and delivery of road infrastructure and site access in accordance with relevant Australian Standards and relevant guidelines (Conditions B1-B3).
- Implementation of bushfire protection measures, including perimeter fire access roads (Condition B4).
- Provision of bicycle parking and end-of-trip facilities with suitable pedestrian connections (Condition B5).
- Compliance with Sydney Water requirements and implementation of soil and water management measures, including minimum building floor levels (Conditions B6-B8 and B1-B2).
- Provision of landscaping to provide visual screening of the approved development, including acoustic barriers, blank walls and/or loading docks (Conditions B9-B11).
- Compliance with established noise criteria based on sensitivity of receiver types/locations, including potential for acoustic barriers if required (Conditions B12-B13).
- Selection of appropriate buildings and materials which satisfy relevant building and fire safety requirements (Conditions B14-B15).

- Compliance with Endeavour Energy requirements for buildings within 15 metres of a transmission tower or close to the electrical network and maintenance of access (Conditions B16-B18).
- Preliminary research and investigations to avoid impacts to existing utility services and safety issues (Conditions B19-B20).
- Assessment of hazards and risks for future developments in accordance with relevant legislation and having regard to the proximity to the Jemena high pressure gas pipelines (Conditions B21-B22).

## 1.4. RELATED DEVELOPMENT

A Modification Application (**Mod 1**) was formally lodged by Charter Hall on 13 July 2022 to facilitate lodgement of a SSDA for Proposed Lot 7 in the north-eastern part of the site. The proposed modifications included changes to the approved subdivision layout and building envelopes, as listed below:

- Increase in the overall net developable area (**NDA**) from 293,637m<sup>2</sup> to 296,173m<sup>2</sup> (increase of 2,536m<sup>2</sup>) resulting from a reduction in the extent of the estate road (note no changes were proposed to the overall site area).
- Reduction in the number of industrial lots and associated building envelopes from seven to six.
- Increase in the overall GFA from 165,500m<sup>2</sup> to 177,230m<sup>2</sup> (increase of 11,730m<sup>2</sup>) due to the increased NDA and reduced number of lots.
- Modifications to the detailed site preparation works in Stage 1 including:
  - Provision for boundary retaining walls within the scope of works.
  - Alterations to the extent of retaining walls and associated earthworks along the north-western boundary.
  - Modifications to the stormwater layout, including the deletion of the M7 upstream flow pipes, with a diversion of the upstream catchment into a swale drain on the north-west side of the site.
  - Adjustment to the proposed bio-retention basin and associated stormwater control structures and minor changes to the proposed Eskdale Creek diversion from progressed detailed design.
  - Amending the estate road from being a 'private road' to a 'public road'.

At the time of preparing this Scoping Report, Mod 1 had completed public exhibition. Agency responses were provided by the DPE Biodiversity and Conservation Group, the DPE Water Group, Blacktown City Council (**Council**), Transport for NSW, Jemena Gas Networks, and Energy Resource Industry Assessments. No submissions were received from the public or community groups. A Submissions Report will be prepared in accordance with the relevant SSD Guidelines and in response to each of the final submissions.

Further modifications will be sought by Charter Hall for concurrent assessment by the DPE and in association with this SSDA. Two separate modification applications are proposed to facilitate changes to the subdivision layout and satisfy contractual arrangements between Charter Hall as the long-term leaseholder and Woolworths as the incoming tenant. Each of these applications is described below and shown in **Figure 3** and **Figure 4**.

- Modification Application (**Mod 2**) will comprise changes to the approved subdivision layout to provide for an amended lot configuration to meet market demand. This includes a revision to the approved lot boundaries to facilitate the delivery of a suitable sized lot to accommodate the proposal for Woolworths as outlined in this Scoping Report. However, it is necessary to provide for an alternative development scheme to maintain flexibility for Charter Hall in case the Woolworths SSDA does not proceed. The proposed amendments in Mod 2 will include:
  - Reducing the overall net developable area (**NDA**) to 291,402m<sup>2</sup> which equates to a reduction of 2,235m<sup>2</sup> compared to the original approval (or 4,771m<sup>2</sup> compared to the current proposal in Mod 1 which is pending determination). The net change results from the proposed extension of the estate road further to the south (nb no changes were proposed to the overall site area).
  - Revising the total GFA to 168,980m<sup>2</sup> which equates to an increase of 3,480m<sup>2</sup> compared to the original approval (165,500m<sup>2</sup>) or a reduction of 8,250m<sup>2</sup> compared to the current proposal in Mod 1 (177,230m<sup>2</sup>).

- Modifying the approved building envelopes for the six industrial lots, including associated changes to the individual GFAs. The proposed layout allows for the Woolworths development to be constructed over Lots 2-4, however, the detailed changes to the building envelope will be subject to a separate modification (refer below). Three speculative warehouse buildings have been shown by Charter Hall in concept which could be delivered by way of a separate approval if Woolworths chose not to proceed with this SSDA.

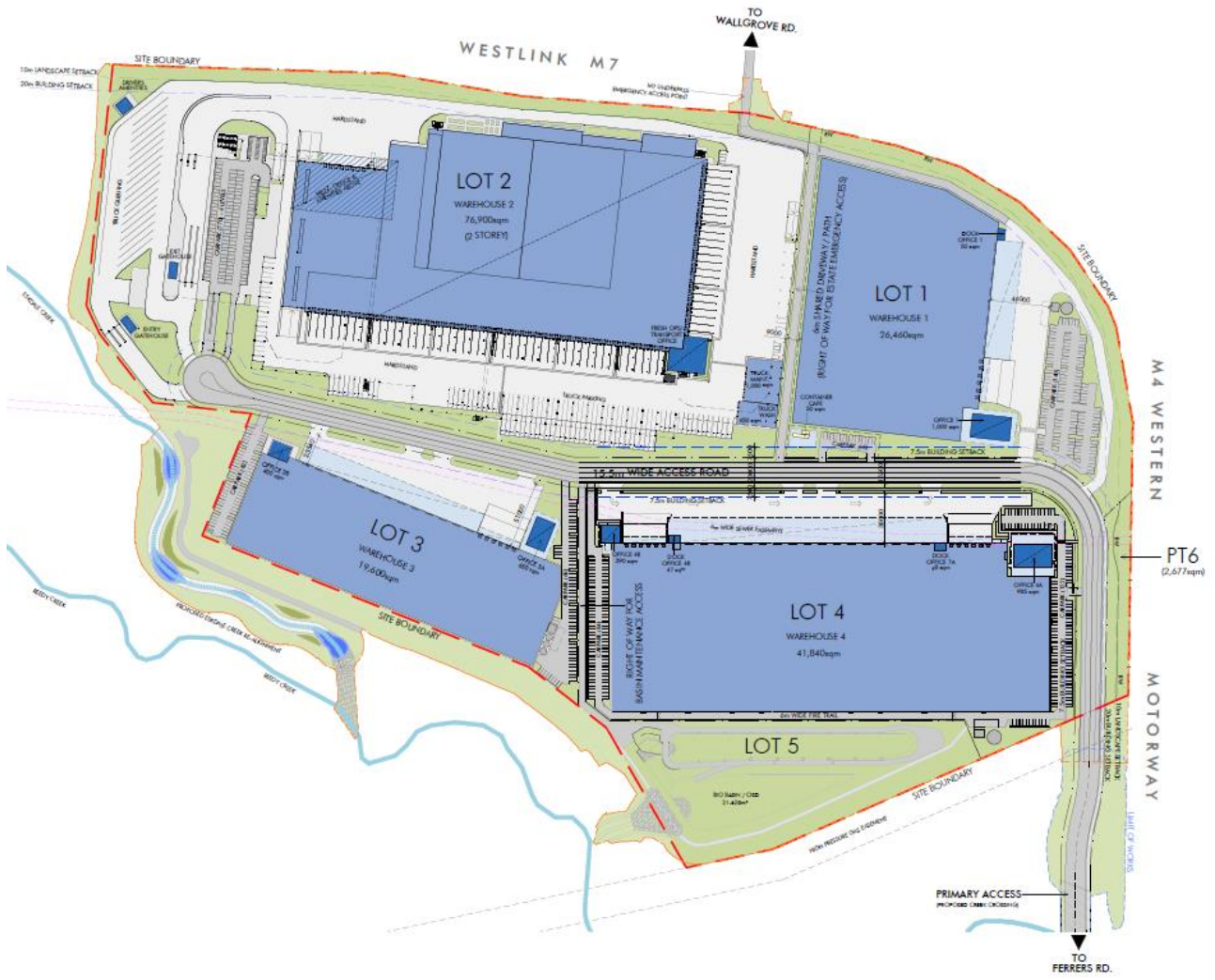
Figure 3 Indicative Layout for Mod 2 (Source: Nettleton Tribe, 2022)



- Modification Application (**Mod 3**) will be prepared by Charter Hall and will seek approval for the proposed modifications to the subdivision layout, GFA and building envelope as required to deliver the proposed two-storey warehouse or distribution centre development in the south-western part of the site. The proposed amendments will include:
  - Reducing the number of industrial lots and building envelopes, with corresponding changes to the lot numbers. The Woolworths development is to be accommodated on Proposed Lot 2. A separate SSDA (or SSDAs) will be lodged for the future buildings on Proposed Lots 1 and 3. The current SSDA for Lot 7 is to be delivered on Proposed Lot 4. There will be no change to the NDA or site area.
  - Revising the total GFA to 174,940m<sup>2</sup> which equates to an increase of 9,440m<sup>2</sup> compared to the original approval (165,500m<sup>2</sup>) or a reduction of 2,290m<sup>2</sup> compared to the current proposal in Mod 1 (177,230m<sup>2</sup>).
  - Modifying the approved building envelope for Proposed Lot 2 to accommodate a large-scale two-storey warehouse or distribution centre building with a maximum height of 34.8 metres.

The indicative layouts for Mods 2 and 3 are shown in the following figures. It is noted these plans are subject to change, with the final layouts to be provided within the Modification Applications.

Figure 4 Indicative Layout for Mod 3 (Source: Nettleton Tribe, 2022)



## 2. STRATEGIC CONTEXT

This section describes the way in which the proposal addresses the strategic planning policies relevant to the site. It identifies the key strategic issues relevant to the assessment and evaluation of the project which will be explored in further detail within the future EIS.

### 2.1. PROJECT JUSTIFICATION

The proposed development is aligned with the State, district and local strategic plans and policies applying to the site as outlined below.

#### 2.1.1. NSW State Priorities

The Premier's Priorities include 14 priorities to enhance the quality of life of the people of NSW and deliver on the government's key policy priorities which include:

- A strong economy
- Highest quality education
- Well connected communities with quality local environments
- Putting customer at the centre of everything we do
- Breaking the cycle of disadvantage

The proposed development will deliver new employment opportunities and economic investment within NSW. It will also deliver additional landscaping across the site, including along the site boundaries and within the individual development lots, including within Proposed Lot 2.

#### 2.1.2. Greater Sydney Region Plan: A Metropolis of Three Cities

The Greater Sydney Region Plan provides the overarching strategic plan for growth and change in Sydney. It is a 20-year plan with a 40-year vision that seeks to transform Greater Sydney into a metropolis of three cities - the Western Parkland City, Central River City and Eastern Harbour City. It identifies key challenges facing Sydney including increasing the population to eight million by 2056, 817,000 new jobs and a requirement of 725,000 new homes by 2036.

The site is within the Blacktown Local Government Area (**LGA**) which is instrumental to contributing to the productivity of both the Central and Western Cities. The District Plan identifies planning priorities for the Central City District that build on the Region Plan's objectives. The following apply to the subject site:

- *Planning Priority C10: Growing investment, business opportunities and jobs in strategic centres.*
- *Planning Priority C11: Maximising opportunities to attract advanced manufacturing and innovation in industrial and urban services land.*
- *Planning Priority C13: Protecting and improving the health and enjoyment of the District's waterways.*

The proposal will contribute investment and new business opportunities in strategic centres and will contribute to meeting the jobs target for Blacktown LGA. A higher target of 19,500 jobs by 2036 is established for the Blacktown LGA. The proposal has the capacity to maximise opportunities to attract advanced manufacturing and innovation in industrial land.

The proposal will include landscaping and has been designed to avoid and minimise impacts on native vegetation and biodiversity. As established under the approved concept proposal associated with SSD-9667, the clearing of vegetation to support the development of the business park will be offset by the purchasing and retiring of ecosystem credits under the *NSW Biodiversity Offsets Policy*.

#### 2.1.3. Our Greater Sydney 2056: Central City District Plan

The Central City District Plan is a 20-year plan to manage growth in the context of economic, social and environmental matters to implement the objectives of the Greater Sydney Region Plan. The intent of the District Plan is to inform local strategic planning statements and local environmental plans, guiding the planning and support for growth and change across the district.

The District Plan contains planning priorities relating to infrastructure provision, establishing land use and transport structure, environmental protection and growing investment, business opportunities and jobs in strategic centres. It recognises the importance of industrial land supply within the Central River City and the Blacktown LGA, noting:

*In Blacktown Local Government Area, a major industry cluster of transport and logistics, storage, warehousing and distribution is developing. This cluster, together with more established industrial precincts, will capitalise on the growth of the Western Parkland and Central River cities.*

The proposal is consistent with the objectives and outcomes identified in the Central City District Plan and will provide for development that addresses the plan's priorities. The proposal will result in increased investment, business opportunities and jobs through the provision of general industrial and light industrial uses with good access to transport infrastructure.

#### **2.1.4. Blacktown Local Strategic Planning Statement 2020**

The Blacktown Local Strategic Planning Statement (**LSPS**) establishes a 20-year vision for the future of the Blacktown LGA in accordance with the relevant provisions of the Region and District Plans. It includes actions to deliver the planning priorities identified within these strategies and will inform decision making regarding future local plan changes.

The site is located within the Blacktown Precinct in accordance with the LSPS. The Productivity Priorities for the Blacktown Precinct provide for industrial activity to be concentrated around the M4 Motorway in the Western Sydney Employment Area, the Blacktown Motorsports Precinct and Seven Hills. The LSPS also recognises the importance of the employment lands and freight networks to deliver jobs and investment opportunities for large national and multinational companies. In light of this, the LSPS nominates the following planning priorities:

- *D7: Jobs and skills for the city – Creating the conditions for a stronger economy.*
- *LPP9: Maximising opportunities to attract advanced manufacturing and innovation in industrial and urban services land.*

The proposed development involves a major investment from Woolworths and significant employment creation within the Blacktown LGA. Accordingly, the proposal will contribute to creating conditions for a stronger economy.

## **2.2. RELEVANT PLANS**

The WSPT is a self-funded Government agency which was formed by the NSW Parliament in 2006. The ten-year vision for the Western Sydney Parklands is contained in the Plan of Management 2030 (**POM**) which was adopted in December 2018.

The adopted POM identifies locations within the Western Sydney Parklands having low environmental or recreational value as suitable for the establishment of business hubs. These areas occupy approximately 2% of the parklands area and are intended for development by the WSPT as a means achieving financial sustainability and to generate revenue to support the parklands operations.

The Precinct Plan shows the proposed business hubs generally located on the perimeter of the Parklands in areas of low conservation or recreation value and close to existing employment areas and the metropolitan road network. Occupation of the business hub premises is by leasehold tenure with revenue generated providing ongoing income for the WSPT while the lands are retained in public ownership. The business hubs aim to deliver revenue from 2% of the WSPT land holdings to fund the management and enhancement of the remaining 98% of the Parklands.

The delivery of the LHIBH, including the Woolworths proposal, will facilitate the delivery of the objectives of the POM, including ongoing revenue through the 99-year lease arrangement for the warehouse.

## 2.3. KEY FEATURES OF SITE AND SURROUNDS

The street address of the LHIBH site is 165 Wallgrove Road and 474 Ferrers Road, Eastern Creek. The site is legally described as Lot 5 in Deposited Plan 804051 and Lot 10 in DP 1061237. Charter Hall is the long-term leaseholder for the LHIBH site as outlined in **Section 1.3.1**.

The location of the LHIBH site is illustrated in **Figure 5**. Proposed Lot 2 is in the south-west corner of the LHIBH site as shown in **Figure 6**.

Figure 5 LHIBH Site Location (source: Urbis, 2022)



The key features of the site which have the potential to impact or be impacted by the proposed development are summarised in the table below.

Table 3 Key Features of Site and Locality

| Descriptor           | Site Details   |
|----------------------|--|
| Existing Development | The site largely consists of agricultural grassland. Clusters of vegetation comprising medium sized trees and shrubs are dispersed across the site.  |
| Local Context        | <p>The site is within the Western Sydney Parklands, which runs north and south of the site. The surrounding locality is described below.</p> <p><b>North:</b> To the immediate north the site is bounded by the M4 Western Motorway. Beyond this, the surrounding development consists of light industrial uses. Western Sydney Zoo and Bungarribee Park are located further northward.</p> <p><b>South:</b> To the immediate south the development relates to a waste management centre and a brick manufacturing site.</p> |

| Descriptor                     | Site Details  |
|--------------------------------|---|
|                                | <p><b>East:</b> The development to the east relates to a motorsport circulate known as Sydney Motorsport Park which is operated by the NSW Government.</p> <p><b>West:</b> To the direct west the site is bounded by the Westlink M7 Motorway. To the north west the site is bounded by Light Horse Interchange. Beyond this to the west lies a range of light industrial warehouse developments and Pinegrove Memorial Park.</p>   |
| <b>Regional Context</b>        | <p>The site is 33km west of the Sydney CBD, 15km from Parramatta CBD, 15km from Penrith and 6km from Blacktown. Western Sydney Airport is located 15m south-west of the site. The site is east of the Western Sydney Employment Area (<b>WSEA</b>). The site is within the Western Parkland City and the Central City District. The POM designates the site as forming part of Precinct 6 – Wallgrove Precinct which is strategically significant due to its potential to accommodate a business hub.</p> |
| <b>Infrastructure</b>          | <p>The site is at the corner of the M4 and M7 Motorways which comprises the Light Horse Interchange. This road infrastructure provides access to the local and regional road transport network.</p>   |
| <b>Site Access</b>             | <p>The site is currently accessible from a driveway off Wallgrove Road to the west (via an underpass under the M7) and Ferrers Road to the east via an existing maintenance access road. Access via Wallgrove Road will be limited to emergency vehicle access during the operational phase of the project in accordance with the Concept Plan approval.</p>  |
| <b>Easements and Covenants</b> | <p>A sewer main easement managed by Sydney Water runs north to south through the site. A high-pressure gas easement is east of the developable area, running north-south and adjacent to the approved bio-detention basin.</p>  |
| <b>Services</b>                | <p>The existing utility services will be augmented to accommodate the needs of the approved development. The Concept Approval (SSD 9667) approval provides for the provision of infrastructure and essential services. This includes a new road and roundabout intersection from Ferrers Road capable of supporting B Double Heavy Vehicles.</p>  |
| <b>Acid Sulfate Soils</b>      | <p>Geotechnical investigations undertaken to facilitate the Concept Approval found sulphate levels across the site ranged from 68 to 200 and have a 'mild' classification for high permeability soils in groundwater and 'non-aggressive' classification for low permeability soils above ground water.</p>   |
| <b>Contamination</b>           | <p>Site contamination investigations undertaken in association with the Concept DA recommended mitigation measures including the decommissioning of existing buildings and structures and treatment and disposal of asbestos material. Additional testing was recommended for specific components to ensure it is suitable for the future industrial uses.</p>  |

| Descriptor                     | Site Details   |
|--------------------------------|--|
| <b>Stormwater and Flooding</b> | Several waterways traverse the site, including Eastern Creek which is the main creek alignment dissecting the site, Reedy Creek and Eskdale Creek.   |
| <b>Bushfire Prone Land</b>     | The site is identified as Vegetation Category 3 bushfire prone land which presents a medium bushfire risk. The hazard assessment submitted with the Concept DA concluded development could be accommodated with bushfire protection measures, including defensible space around buildings and adequate access and water supply for fire fighters.  |
| <b>Flora and Fauna</b>         | The Biodiversity Development Assessment Report (' <b>BDAR</b> ') lodged with the Concept SSDA identified Threatened Ecological Communities under the NSW <i>Biodiversity Conservation Act 2016 (BC Act)</i> , including <i>Cumberland Plain Woodland</i> and <i>River-flat Eucalypt Forest</i> . One threatened species known as the Southern Myotis ( <i>Myotis Macropus</i> ) is listed as Vulnerable under the BC Act and was recorded on the subject land. The Concept Approval includes conditions to offset biodiversity impacts through the NSW Biodiversity Offsets Scheme and to enhance and protect riparian and other vegetation on the site. |
| <b>Aboriginal Heritage</b>     | An Aboriginal Cultural Heritage Assessment ( <b>ACHA</b> ) was submitted with the Concept DA which identified two areas of high archaeological significance along Eskdale Creek and Eastern Creek. The balance of the site is of low archaeological significance. The Concept Approval conditions provide for ongoing consultation with the Registered Aboriginal Parties ( <b>RAP</b> ) and an unexpected finds protocol during redevelopment of the site.  |
| <b>European Heritage</b>       | A Non-Aboriginal Heritage (European) Heritage Assessment was submitted with the Concept DA which concluded the remaining buildings and structures did not meet the threshold for local significance and the historical archaeological potential of the study area was considered low or nil. No further historical archaeological assessment or mitigation measures were warranted. However, an unexpected finds procedure was recommended in accordance with the Heritage Act provisions.   |

## 2.4. CUMULATIVE IMPACTS WITH FUTURE PROJECTS

The potential cumulative impacts of the Project will be addressed in the EIS in accordance with the DPE *Assessing Cumulative Impact Guidelines*. Approved and likely future developments which may be relevant in the cumulative impact assessment of the proposal are summarised in the following table.

Table 4 Surrounding Projects

| Address                           | DA Reference | Development Description   | Current Status          |
|-----------------------------------|--------------|---|-------------------------|
| 65 Huntingwood Drive, Huntingwood | SSD-17352813 | Huntingwood Processing Facility Expansion - construction and operation of a new Arnott's food processing (bakery) facility, new additional ancillary structures including | Approved<br>1 July 2022 |

| Address  | DA Reference | Development Description  | Current Status            |
|--|--------------|--|---------------------------|
|  |              | ingredient silo building, processing building and storage building   |                           |
| 339 Wallgrove Road, Eastern Creek                                    | SSD-10395    | Cleanaway's Western Sydney Energy & Resource Recovery Centre - build an energy-from-waste facility that can generate up to 58 megawatts of power by thermally treating up to 500,000 tonnes per year of residual municipal solid waste and residual commercial and industrial waste.                                     | Response to submissions   |
| Lot 1 Eastern Creek Drive, Eastern Creek                             | SSD-30923027 | Compass 2 Warehouse & Distribution Centre - construction and operation of a Warehouse and Distribution Centre including minor earthworks, civil works and utilities servicing, and car parking.  | Response to Submissions   |
| 1A Eucalyptus Place, Eastern Creek                                   | SPP-20-00005 | Designated and Integrated Development proposing to increase the processing capacity of an existing waste processing facility from 30,000 to 40,000 tonnes per year. The nature of waste types to be processed and stored on site consists of plastic, aluminium, liquid paperboard, steel and glass beverage containers. | Approved 5 March 2021     |
| 24 Healy Circuit, Huntingwood  | SPP-19-00014 | Demolition of the existing warehouse facility and construction of a data centre including car parking and amenities  | Approved 26 March 2020    |
| 10 Eastern Creek Drive, Eastern Creek                                | SPP-19-00013 | Stage 1 detailed design and Stage 2 concept approval of new Data Centre  | Approved 6 May 2020       |
| 90 Peter Brock Drive, Eastern Creek                                  | SPP-19-00009 | Partial demolition of an existing data centre and the construction of an eight-storey extension and associated works   | Approved 16 November 2020 |
| Lot 7, LHIBH, 165 Wallgrove Road and 475 Ferrers Road, Eastern Creek | SSD 34991713 | Construction of a warehouse and distribution centre with ancillary office floor space that has a total FSR of 0.64:1 and 206 parking spaces.   | Under assessment          |

## 2.5. AGREEMENTS WITH OTHER PARTIES

Woolworths is not proposing to enter into any planning agreements to facilitate construction of the warehouse or distribution centre development on Proposed Lot 2.

### 3. PROJECT

This section outlines the key features of the proposed development, including the project area, the conceptual physical layout and design (including likely mitigation measures), the main land use activities and the likely timing for delivery of the project.

It also includes a high-level of feasible alternatives which were considering having regard to the project objectives outlined in **Section 1.3** of this report, including consequences of not carrying out the development.

#### 3.1. PROPOSED DEVELOPMENT

The key components of the proposed development are listed in the following table. A copy of the architectural concept drawings is attached as **Appendix B**.

Table 5 Project Details

| Descriptor              | Project Details  |
|-------------------------|--|
| Project Area            | The site (Proposed Lot 2) has a total area of 134,267m <sup>2</sup> . The site will be created through the Concept DA and associated modification applications.  |
| Site Description        | The LHIBH site is legally described as Lot 10 in DP 1061237 and Lot 5 in DP 804051. Proposed Lot 2 is located within the south-western corner of the LHIBH site as shown in <b>Figure 4</b> .  |
| Land Use                | The site forms part of the Western Sydney Parklands and has been approved for the Light Horse Interchange Business Hub.  |
| Site Preparation        | The site works required to facilitate the construction of the proposed development were approved under SSD-9667 (refer <b>Section 3.2.2</b> ).   |
| Project Description     | <p>The SSDA seeks approval for the construction and operation of a warehouse and distribution centre by Woolworths, comprising a Chilled and Fresh Distribution Centre with ancillary offices, car parking and associated site facilities.</p> <p>The SSDA is to be lodged concurrently with an application to modify the Concept Proposal and Stage 1 Detailed Proposal including amendments to the subdivision layout, GFA and building envelope to deliver the warehouse or distribution centre proposed by Woolworths.</p> |
| Gross Floor Area (GFA)  | <p>Total GFA of 83,420m<sup>2</sup> broken down as follows:</p> <ul style="list-style-type: none"> <li>▪ Fresh Distribution Centre 43,580m<sup>2</sup></li> <li>▪ Chilled Distribution Centre 34,960m<sup>2</sup></li> <li>▪ Mezzanine (amenities / lunch room) 2,500m<sup>2</sup></li> <li>▪ Other buildings (security office, truck maintenance and wash, driver amenities, gatehouses) 2,380m<sup>2</sup></li> </ul>  |
| Parking and Access      | 776 vehicles   |
| Overall Building Height | 34.8m (measured from FFL)  |
| Hours of Operation      | 24 hours, 7 days a week  |

| Descriptor               | Project Details   |
|--------------------------|---|
| Capital Investment Value | \$373,400,000 (excluding GST). The QS Report is included at <b>Appendix A</b> . |

## 3.2. FEASIBLE ALTERNATIVES

Clause 192 in Division 5 of the *Environmental Planning and Assessment Regulation 2021 (the Regulation)* requires an analysis of any feasible alternatives to the proposed development, including the consequences of not carrying out the development. Each of the project alternatives considered for this proposal is listed and discussed in the following table.

Table 6 Analysis of Feasible Alternatives

| Option                                  | Comments   |
|---|--|
| <b>Option 1 – Do Nothing</b>            | <p>The 'do nothing' option entails leaving the site in its current state. It would fail to realise the benefits associated with the Concept Approval, including delivery of employment generating floor space which support the productivity of the region and broader economy.</p> <p>It also involves Woolworths not delivering any additional warehouse or distribution centre facilities, limiting their operational capacity to service growing demand for fresh and chilled produce. It would require Woolworths to utilise existing, smaller distribution centres, increasing operational and logistics costs and limiting supply chain efficiencies.</p> |
| <b>Option 2 – Alternative Layout #1</b> | <p>During the design development phase, consideration was given to an alternative layout which included the following:</p> <ul style="list-style-type: none"> <li>▪ Relocating the ground floor car park from the southern to the northern portion of the site.</li> <li>▪ Relocating the building envelope further south.</li> <li>▪ Reconfiguring the entry and exit arrangements, with the entry gateway repositioned further west.</li> <li>▪ Relocating the office space at the upper level from south to north.</li> </ul> <p>This layout option was discounted as it failed to achieve a satisfactory level of operational efficiency.</p>                |
| <b>Option 3 – Alternative Layout #2</b> | <p>Consideration was given to a second alternative layout during the design development phase which included:</p> <ul style="list-style-type: none"> <li>▪ Relocating the ground floor car park from the south to the northern portion of the site.</li> <li>▪ Shortening the length of Estate Road and relocating the entry and exit driveways.</li> <li>▪ Relocating the entry gatehouse to the northern portion of the site.</li> </ul> <p>This option was discounted because the road layout could result in truck queuing on the Estate Road and it would provide a less efficient outcome.</p>   |

| Option   | Comments  |
|--|---|
| <p><b>Option 4 – Alternative Location</b></p>  | <p>Woolworths lodged a SSDA in August 2021 for the construction and operation of a warehouse or distribution centre for handling chilled and fresh products at 250 Victoria Street, Wetherill Park (SSD 15221509).</p> <p>Wetherill Park is considered the optimum location for the proposed warehouse or distribution facility based on its accessibility and proximity to the Woolworths Metropolitan Store Network. It also represents a more convenient location for its employees, with superior access to services and amenities compared to the LHIBH site. However, various unforeseen operational constraints identified during the assessment of the SSDA for the Wetherill Park site have required Woolworths to explore an alternative location for the proposed facility, including the LHIBH site.</p> <p>The current proposal is considered the only viable alternative location when considering the operational requirements of the proposed warehouse and distribution centre. Alternative sites to the east and west of the LHIBH site were discounted due to transport inefficiencies, potential for noise impacts to sensitive receivers, travel distance to surrounding Woolworths stores and site constraints.</p> |
| <p><b>Option 5 – Amend SSD-9667 to deliver a multi-level warehouse facility on Proposed Lot 2 at LHIBH</b></p> | <p>The option to deliver a multi-level warehouse or distribution centre development on Proposed Lot 2 was considered the optimal outcome for the proposal. This option requires a concurrent Modification Application to be prepared by Charter Hall to facilitate amendments to the subdivision layout, GFA and building envelope in the Concept Approval. However, it will facilitate the operational efficiencies required by Woolworths and avoids unacceptable impacts to the immediate and surrounding locality.</p>  |

## 4. STATUTORY CONTEXT

This section of the report provides an overview of the key statutory requirements relevant to the site and the project, including:

- *Environment Protection and Biodiversity Conservation Act 1999 (Cth)*
- *Biodiversity Conservation Act 2016*
- *Rural Fires Act 1997*
- *Western Sydney Parklands Act 2006*
- *Environmental Planning and Assessment Act 1979*
- *State Environmental Planning Policy (Precincts – Western Parkland City) 2021*
- *State Environmental Planning Policy (Planning Systems) 2021*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *State Environmental Planning Policy (Industry and Employment) 2021*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *Sydney Regional Environmental Plan No 20 – Hawkesbury-Nepean River (No 2 – 1987)*

Consideration is will also be given to the following matters:

- SSD-9667
- Premier’s Priorities
- Greater Sydney Region Plan: A Metropolis of Three Cities
- Our Greater Sydney 2056: Central City District Plan
- Future Transport Strategy 2056
- Our Blacktown 2036 Community Strategic Plan
- Western Sydney Parklands Plan of Management 2030

The following table categorise and summarises the relevant requirements in accordance with the DPIE guidelines. Each of these matters will be addressed in further detail within the future EIS.

### 4.1. STATUTORY REQUIREMENTS

The following table categorises and summarises the relevant requirements in accordance with the DPE *State Significant Development Guidelines*.

Table 7 Identification of Statutory Requirements for the Project

| Statutory Relevance     | Action  |
|-------------------------|---|
| Power to grant approval | <p>In accordance with Schedule 2, clause 5 of the <i>State Environmental Planning Policy (Planning Systems) 2021</i>, development that has a CIV of more than \$10 million within the Western Sydney Parklands Area is classified as SSD:</p> <p><b><i>Clause 5 Development in the Western Parklands</i></b></p> <p><i>Development that has a capital investment value of more than \$10 million on land identified as being within the Western Parklands on the Western Sydney</i></p> |

| <b>Statutory Relevance</b> | <b>Action</b>  |
|----------------------------|--|
|                            | <p><i>Parklands Map within the meaning of State Environmental Planning Policy (Western Sydney Parklands) 2009</i>.</p> <p>The proposed works have an estimated CIV of \$373,400,000 (excluding GST) and accordingly, the proposal is SSD for the purposes of the SEPP.</p>   |
| Permissibility             | <p>The proposed development is permitted with development consent in accordance with Clause 11(2) of <i>State Environmental Planning Policy (Precincts—Western Parkland City) 2021 (SEPP Precincts Western Parkland City)</i>.</p> <p>Clause 7.9(3) specifies that ‘<i>any development not specified in subsection (1) or (4), or permitted without consent by subsection (2), may be carried out in the Western Parklands only with consent</i>’. Subsection (2) relates to clause 7.9(2) and states ‘<i>development for the purposes of extensive agriculture, other than farm buildings, may be carried out on public land in the Western Parklands without consent unless the land is in an environmental conservation area as shown on the Environmental Conservation Area Map</i>’. Subsection (4) relates to clause 7.9(4) and specifies that ‘<i>development for the purposes of residential accommodation is prohibited in the Western Parklands</i>’.</p> <p>The development relates to a ‘<i>warehouse and distribution centre</i>’ is not specified in subsection (1), (2) or (4). Accordingly, the proposed development is permitted with development consent in accordance with clause 7.9(3) of the Policy.</p> |
| <b>Other Approvals</b>     | No requirements for other approvals have been identified at this stage.  |

## 4.2. PRE-CONDITIONS

Table 8 outlines the pre-conditions to exercising the power to grant approval which are relevant to the project and the section where these matters are addressed within the Scoping Report.

Table 8 Pre-Conditions

| <b>Statutory Reference</b>   | <b>Pre-condition</b>  | <b>Relevance</b>  | <b>Section</b> |
|--|---|---|----------------|
| <i>State Environmental Planning Policy No 55 - Remediation of Land (SEPP 55) – clause 7(1)</i> | A consent authority must be satisfied that the land is suitable in its contaminated state - or will be suitable, after remediation - for the purpose for which the development is proposed to be carried out. | The Concept Approval satisfactorily addressed the remediation requirements necessary to ensure the site is suitable for its intended use. | Section 1.3    |
| Concept development consent (see section 4.24 of the Act)                                      | Determination of any further development application in respect of the site cannot be inconsistent with the consent for the concept proposals for the development of the site.                                | The consent conditions associated with SSD 9667 and any subsequent modifications will be addressed as part of the future EIS.             | Section 1.3    |

### 4.3. MANDATORY CONSIDERATIONS

The following table outlines the relevant pre-conditions to exercising the power to grant approval and the section where these matters are addressed within the EIS.

Table 9 Mandatory Considerations

| Statutory Reference   | Mandatory Consideration  |  |
|---|--|--|
| Consideration under the EP&A Act and Regulation   |  |  |
| Section 1.3   | Relevant objects of the EP&A Act   | To be addressed in the EIS.  |
| Section 4.15  | <ul style="list-style-type: none"> <li>▪ Relevant environmental planning instruments.</li> <li>▪ Relevant draft environmental planning instruments.</li> <li>▪ Relevant planning agreement of draft planning agreement.</li> <li>▪ Development control plans.</li> <li>▪ The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.</li> <li>▪ The suitability of the site for the development.</li> <li>▪ The public interest.</li> </ul> | To be addressed in the EIS.  |
| <i>Mandatory Relevant Considerations under EPIs</i>                                     |  |  |
| <i>State Environmental Planning Policy (Resilience and Hazards) 2021 (R&amp;H SEPP)</i> | Relevant Departmental Guidelines include <i>Applying SEPP 33</i> (nb SEPP 33 has now been consolidated into the R&H SEPP)  | A Hazards Assessment will be prepared as part of the EIS, as required by the Policy. |
| <i>State Environmental Planning Policy (Precincts – Western Parkland City) 2021</i>     | <p><i>State Environmental Planning Policy (Precincts – Western Parkland City) 2021</i> is the principal environmental planning instrument that applies to the site. Consideration will be given to the provisions in Chapter 7 which relate to the Western Sydney Parklands, including:</p> <ul style="list-style-type: none"> <li>▪ Part 7.1 – Preliminary</li> <li>▪ Part 7.2 – Land uses and provisions applying to development.</li> <li>▪ Part 7.4 – Miscellaneous Provisions</li> </ul>  | To be addressed in the EIS.  |

| Statutory Reference  | Mandatory Consideration   |                                       |
|--|---|---------------------------------------|
| <p><i>Blacktown Local Environmental Plan (2015)</i> (BLEP 2015)</p>      | <p>Pursuant to clause 4.4(2) of the <i>State Environmental Planning Policy (Precincts – Western Parkland City) 2021</i>, BLEP 2015 does not apply to the proposed development. Consideration will be given to the following clauses on a merit basis to assess the compatibility of the proposal with surrounding land uses:</p> <ul style="list-style-type: none"> <li>▪ Part 4 – Principal development standards</li> <li>▪ Part 5 – Miscellaneous provisions</li> <li>▪ Part 6 – Local provisions</li> <li>▪ Part 7 – Additional local provisions</li> </ul> | <p>To be addressed in the EIS.</p>    |
| <p><i>Biodiversity Conservation Act 2016 (BC Act)</i> – section 7.14</p> | <p>The potential impact of the proposed development on biodiversity values have been assessed under the <i>Biodiversity Development Assessment Report (BDAR)</i> submitted with the Concept Approval under SSD 9667. The proposal will necessitate the removal of vegetation. The loss of this vegetation is to be offset in accordance with the requirements of the <i>Biodiversity Conservation Regulation 2017</i> as calculated under the requirements of the Biodiversity Assessment Method (BAM).</p>   | <p>No further assessment required</p> |
| <p><b>Development Control Plans</b></p>                                  |   |                                       |
| <p>Blacktown Development Control Plan 2012 (BDCP 2015).</p>              | <p>Development Control Plans (DCPs) do not apply to land within the Western Sydney Parklands.</p>   | <p>No further assessment required</p> |
| <p><b>Concept Approval</b></p>   |   |                                       |
| <p>Concept Approval SSD-9667</p>   | <p>Detailed consideration will be given to the relevant consent conditions within Concept Approval SSD-9667 (as modified), including any concurrent modification application(s) relating to the siting and design of buildings across the LHIBH site.</p>   | <p>To be addressed in the EIS.</p>    |

## 5. COMMUNITY ENGAGEMENT

During the preparation of this Scoping Report, early engagement was conducted with the following State and local authorities:

- NSW Department of Planning and Environment (**DPE**)
- Transport for NSW (**TfNSW**)
- Blacktown City Council (**Council**)

This included a Scoping Meeting with DPE on 12 August 2022 and a follow up meeting with DPE, TfNSW and Council on 16 September 2022. Feedback received from these meetings has been incorporated into this Scoping Report, including the proposed assessment of impacts in **Section 6**.

Community engagement was undertaken by WSPT in association with the Concept Plan DA (SSD-9667). Details of the consultation undertaken during the preparation of the Concept DA is detailed in the Consultation Report prepared by WSPT and lodged with the EIS as *Appendix M*.

Key groups and individuals within the community were identified by the applicant as having a potential interest in the project by analysis of geographical location and the commercial/industrial nature of the proposal. These groups and individual include:

- Sydney Motorsports Park
- Alpha Hotel
- Sydney Dragway
- Eastern Creek Waste Management Centre/SUEZ
- Austral Bricks
- Veolia
- Joe Damjanovic
- Property NSW
- Office of Strategic Land

Engagement was also undertaken with State government agencies and authorities and other relevant stakeholders including:

- NSW Department of Planning and Environment
- Office of Environment and Heritage
- Blacktown City Council
- Sydney Water
- WaterNSW
- Fire and Rescue NSW
- Rural Fire Service
- Environmental Protection Authority
- NSW Department of Industry

The Consultation Report prepared by WSPT categorises the issues raised by stakeholders and the way in which these issues were responded to in the final Concept DA. WSPT committed to ongoing engagement with stakeholders, including regular updates via the WSPT website and associated feedback mechanisms.

Further community and stakeholder consultation will be undertaken in the preparation and assessment of the Modification Report and the new SSDA for Proposed Lot 2 including:

- NSW Department of Planning and Environment
- Blacktown City Council
- NSW Transport
- Sydney Water
- Jemena
- Fire and Rescue NSW

If considered appropriate and necessary, adjoining land owners and any additional stakeholders identified through discussions with the above authorities and agencies, may also be consulted.

## 6. PROPOSED ASSESSMENT OF IMPACTS

This section identifies the key impacts which will be further investigated and assessed within the EIS, including the proposed approach to assessing each of these matters as outlined in the Scoping Summary Table held as **Appendix C**.

It also identifies the matters addressed in the scoping phase that are unlikely to result in significant impacts and do not warrant further consideration in the EIS. Where relevant, reference is made to the Modification Application which will be lodged concurrently with the SSDA for Proposed Lot 2.

### 6.1. MATTERS REQUIRING FURTHER ASSESSMENT IN THE EIS

#### 6.1.1. Built Form and Urban Design

The proposed subdivision plan and building envelopes were subject to a detailed assessment in the assessment of the Concept DA. The Proposed Lot 2 development will be assessed in accordance with the Urban Design Guidelines, including the detailed siting and design guidelines established within the original Concept DA approval. Detailed consideration will be given to the proposed increased building height and the associated potential visual impacts.

The concurrent Modification Application will provide minor updates to the Urban Design Guidelines. The plans within Appendix 1 (Figures 1-3) will need to be updated and appended to the modified Concept DA approval. An updated photomontage may also be required to demonstrate the visual impacts of the proposal (refer below). However, the key urban design principles will be retained. Consideration will also be given to any airspace operational requirements for Western Sydney International Airport.

#### 6.1.2. Landscaping

Similar to the built form and urban design as outlined above, the proposed landscape treatment and visual impacts were also subject to a detailed assessment in the original Concept DA.

The detailed landscape treatment for the Proposed Lot 2 development will be designed to respond to the requirements of Condition B9, which requires the future landscaping to be '*consistent with the key principles and plant species*' in the approved Landscape Plans. The Landscape Master Plan will be updated as considered appropriate to incorporate the changes to the approved subdivision layout.

The detailed design to be provided with the SSDA will consider the architectural appearance and landscape treatment to ensure a high-quality street presentation. The final architectural package will also detail the rationale for the siting and layout of the proposed development, including loading and access arrangements.

#### 6.1.3. Visual Impacts

A Visual Impact Assessment (**VIA**) will be included within the EIS to consider the potential impacts of the proposed built form, urban design and landscaping on the visual amenity of the surrounds.

For the purposes of this Scoping Report, photomontages of key viewpoints that accompanied the approved Concept Plan (SSD-9667) have been updated to provide an indicative indication of the possible visual impacts (refer to **Figure 6** and **Figure 7**). Although preliminary, the photomontages indicate that the proposal adopts a recessive colour palette, is reasonable in scale having regards to its setting and sits comfortably within the locality without obscuring significant views. In light of this, being located within a locality earmarked to accommodate an industrial business hub and surrounded by non-sensitive commercial and industrial uses, it is not envisaged that the proposal will give rise to unacceptable visual impacts.

The VIA to accompany the SSD will be prepared to consider the key sightlines to the Proposed Lot 2 building, including the sections of the proposed warehouse or distribution centre building which will be visible above the existing tree-line. The VIA will be prepared in accordance with relevant key guidelines including RMS Environmental Impact Assessment Guidance (Note: *Guidelines for Landscape Character and Visual Impact Assessment (2020)* and the *Guidance for Landscape and Visual Impact Assessment (GLVIA), Third Edition (2013)*). If impacts are to occur, the report will nominate mitigation measures to ensure that any potential impacts are within acceptable levels.

Figure 6 Proposed Development Perceived from the M4 Motorway (Source: Watson Young Architects and Morphmedia, 2022)



Figure 7 View of Proposed Development from Nearby Overpass (Source: Watson Young Architects and Morphmedia, 2022)



It is noted that a new VIA framework is being prepared for Mod 3 which will accompany this SSD application. The new VIA will utilise viewpoints which have been determined through undertaking a desktop and fieldwork analysis of the site context to establish the potential view catchment. The photographs taken from each of the viewpoints will be utilised as the base for the VIA for both Mod 3 and Woolworths SSDA.

#### 6.1.4. Transport, Traffic and Parking

The Concept Plan was subject to a comprehensive assessment of traffic and transport impacts, including traffic surveys and SIDRA modelling to quantify and assess the existing and future traffic flows along surrounding roads and the performance of key intersections. The Traffic Impact Assessment prepared by Ason Group and lodged with the Response to Submissions for the Concept Plan confirmed the traffic generated would be 420 vehicle trips per hour (vtpH) in the AM peak and 340 vtpH in the PM peak.

A Transport Impact Assessment (TIA) will be undertaken and lodged with the SSDA for the Proposed Lot 2 development to address both operational traffic impact and the construction impact (including access for

construction vehicles). The TIA will detail the investigations undertaken to assess the compliance of the proposal with the Concept Plan approval and the necessity for any additional mitigation measures. Key items to be addressed in the TIA are detailed below.

## Car Parking and Access

Condition B1 of the Concept Plan approval requires on-site car parking to be provided in accordance with the RMS Guide to Traffic Generating Developments and at the following rates:

- (a) 1 space per 300 m<sup>2</sup> GFA for warehouse and distribution centre uses;
- (b) 1 space per 77 m<sup>2</sup> GFA for general industrial and light industrial uses;
- (c) 1 space per 40 m<sup>2</sup> GFA for office uses; and
- (d) 1 space per 100 car parking spaces or part thereof for accessible car parking.

The proposal includes 78,540m<sup>2</sup> of warehouse floor space, including the fresh distribution centre and chilled distribution centre, and 4,800m<sup>2</sup> office floor space, including the security office, truck maintenance and wash facility, gatehouse and mezzanine. 776 on-site car parking spaces are to be provided which exceeds the required parking in accordance with the Concept Approval as outlined below.

Table 10 Car Parking Requirements

| Land Use          | Concept Plan Rate             | Minimum Requirement |
|-------------------|-------------------------------|---------------------|
| Warehouse         | 1 space per 300m <sup>2</sup> | 261.8 spaces        |
| Ancillary Offices | 1 space per 40m <sup>2</sup>  | 120 spaces          |
| Total             | -                             | 381.8 spaces        |

The proposed development seeks to provide 776 parking spaces which exceeds the minimum provisions under the Concept Approval. However, the proposal is considered appropriate as the parking provision addresses the forecast demand based on Woolworths operations, including employee shift changes and safe travel options for night-time shift workers. The parking also addresses concerns raised by Council regarding the potential impacts of a future change of use to general industrial or light industrial uses.

## Vehicle Access

The Proposed Lot 2 development will utilise the approved access arrangements from Ferrers Road and the new Estate Road in accordance with the Concept Plan SSD-9667. Emergency vehicle access will be provided from Wallgrove Road to comply with the requirements of NSW Fire and Rescue.

## Heavy Vehicle Routes and Movements

The maximum vehicle accessing the Proposed Lot 2 development will be 26 metre B-double vehicles. The proposed heavy vehicle routes will be consistent with the approved routes under SSD 9667, including access via the approved roundabout to Ferrers Road. There is already an approved heavy vehicle route (up to 26 metre B-doubles) to the north of the roundabout, providing for both ingress and egress. South-bound heavy vehicle movements are also permitted to the south of the roundabout along Ferrers Road.

The Proposed Lot 2 development has been designed to respond to the proposed modifications to SSD 9667 as outlined in **Section 1.4** of this report. This includes a proposed increase in GFA across the LHIBH site to 174,940m<sup>2</sup> in accordance with Mod 3, which is to be lodged for concurrent assessment with this SSDA.

The traffic generation associated with the Proposed Lot 2 development is currently being assessed in detail and having regard to the following matters:

- Truck Movements: historical data for the existing Minchinbury, Arndell Park and Prospect facilities which support the 'Cold Chain' are being analysed having regard to the truck movements for the Store Delivery Fleet, Vendor Deliveries, Interstate Fleet Movements and Service Vehicle movements. These figures

have been updated to capture sales growth and current forecast allocation of the store network and profile in vendor delivery arrangements.

- **Car Movements:** the existing operations at Minchinbury, Arndell Park and Prospect will be reviewed to confirm anticipated employee numbers. The shift time regime will likely be similar to existing operations at Minchinbury, significantly reducing potential traffic generation during the road network peak periods. Consideration will also be given to utilisation of public transport, private car, cycling, carpooling/sharing transport modes and current profile for team member travel for Minchinbury.

Based on the above and a preliminary assessment of the vtph associated with the Mod 3 application, the predicted traffic generation rates are as follows:

Table 11 Traffic Generation and Breakdown (Source: TTPA Preliminary Analysis, 2022)

| <b>Comparison to Concept Plan</b>                | <b>Concept Plan</b> | <b>Estate Balance</b> | <b>WOW Bdg</b> | <b>Estate Total MOD 3</b> | <b>Difference to Concept Plan</b> |
|--|---------------------|-----------------------|----------------|---------------------------|-----------------------------------|
| Total Floorspace (m <sup>2</sup> )               | 165,500             | 91,520                | 83,420         | 174,940                   |                                   |
| Traffic Generation Rate (per 100m <sup>2</sup> ) | 0.25                | 0.20                  |                |                           |                                   |
| Total AM Peak Traffic (vtph)                     | 420                 | 183                   | 78             | 261                       | -38%                              |
| % of Heavy                                       | 28%                 | 28%                   |                |                           |                                   |
| Split of Total - Light                           | 302                 | 132                   | 16             | 148                       | -51%                              |
| Split of Total - Heavy                           | 118                 | 51                    | 62             | 113                       | -4%                               |
| Traffic Generation Rate (per 100m <sup>2</sup> ) | 28%                 | 14%                   |                |                           |                                   |
| Total PM Peak Traffic (vtph)                     | 340                 | 183                   | 89             | 272                       | -20%                              |
| % of Heavy                                       | 28%                 | 14%                   |                |                           |                                   |
| Split of Total - Light                           | 245                 | 157                   | 29             | 186                       | -24%                              |
| Split of Total - Heavy                           | 95                  | 26                    | 60             | 86                        | -9%                               |

Based on the above, the following matters are noted:

- The proposed traffic generation associated with the Proposed Lot 2 (Woolworths) development is based on the extensive operational knowledge of Woolworths, including the operations of nearby facilities. Relevant data will be included in the TIA to be lodged with the SSDA.
- The contribution of the balance of the estate development will be consistent with the forecast rates as proposed within the TIA and lodged with the Mod 1 application
- The forecast traffic generation for the LHIBH site during the AM and PM peaks is predicted to be less than the approved Concept Plan approval which were based on the 'worst case scenario' rather than a detailed understanding of the tenant operations, including movements outside of the peak periods.
- The forecast movements for the Proposed Lot 2 development show the proposed light vehicle movements during the AM and PM peaks will be significantly less than the original forecasts. This can be

primarily attributed to the proposed shift arrangements for the Woolworths operations. The proposed heavy vehicle movements are generally aligned with the Concept Plan approval.

Each of the above matters will be addressed in further detail within the TIA to be lodged with the SSDA and/or the accompanying application for Mod 3.

## **Construction Traffic**

A TIA will be prepared and lodged with the SSDA to address construction traffic impacts, including access for construction vehicles. Consideration will be given to the compliance of the operational vehicle movements and car parking rates in accordance with the approved Concept Plan (as modified). The proposed internal road design and loading area design will also be assessed in accordance with relevant standards and guidelines.

### **6.1.5. Noise and Vibration**

A Noise and Vibration Assessment will be undertaken to demonstrate compliance with the Environmental Protection Agency's (EPA) *Noise Policy for Industry*, the *Interim Construction Noise Guidelines and Road Noise Policy*. Noise impacts associated with the development will be assessed with respect to the construction and operational phases of the development.

During the construction phase, it is anticipated that noise will emanate from activities related to heavy vehicle movements and light vehicle movements associated with construction staff. The machinery expected to produce noise emissions includes hydraulic hammer, excavator, powered hand tools, bobcat, grader, vibratory roller, cranes, and concrete pumps.

Noise sources during the operational phase are expected to relate to on-site light and heavy vehicle movements, distribution centre loading dock and support activities; and building services plant and equipment including but not limited to cooling towers and air handling units.

Detailed consideration will be given to the proposal's compliance with the conditions of consent which apply in accordance with the Concept Plan approval, having regard to the proposed increase in the approved building envelope and the specific plant and equipment to be installed by Woolworths.

### **6.1.6. Air Quality**

An Air Quality Assessment will accompany the EIS and will consider potential impacts on local and regional air quality as well as any proposed mitigation measures. The proposal will assess potential air quality impacts during the construction and operational phases with consideration given to nearby receptor locations at risk of being impacted by the proposal.

During the construction phase, potential air quality impacts may emanate from dust plumes and engine-exhaust emissions emitted by construction machinery and vehicles. During the operational phase, air quality impacts may result from light and heavy vehicles and Nitrogen Dioxide emissions from the development. The identified air pollution sources are typically associated with industrial developments.

The assessment will be prepared by SLR in accordance with the NSW EPA document '*Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales*'.

### **6.1.7. Stormwater and Water Quality**

The Civil Report lodged with the original Concept DA identified and assessed the stormwater management system for the site and the capacity for future development to comply with the relevant water quality targets. It confirmed that the stormwater management system would consist of an On-site Stormwater Detention (OSD) designed in accordance with Council's OSD policy.

In addition, it confirmed that the system would incorporate stormwater quality improvement devices that would minimise pollution during construction and operational phases of the development.

The subject application will be accompanied by a Civil Report which will assess the proposed stormwater and water quality treatment system. It will consider the relationship to the stormwater system approved under the Concept Plan (as modified). Any changes, updates or additional impacts from that approved under the Concept Plan approval will be assessed.

The assessment will consider Council's policies as well as industry policies such as *Australian Rainfall and Runoff* (1987), *AS 3500.3: National Plumbing and Drainage Code Part 3 – Stormwater Drainage*, and the *Technical Flood Risk Management Guideline: Flood Hazards, 2014, Australian Institute for Disaster Resilience*.

### 6.1.8. Hazards and Risks

The Hazard and Risk Assessment Report lodged with the original Concept DA identified and assessed the proposed risks associated with the proposed industrial business hub. Detailed consideration was given to the Jemena high-pressure gas pipeline which is located to the east of the stormwater detention basin and some distance from Proposed Lot 2.

The following matters will be considered in further detail within the SSDA for Proposed Lot 2.

#### Bushfire Hazards

The site is identified as Vegetation Category 3 bushfire prone land. The proposal will be accompanied by a bushfire impact assessment and any recommendations made by this report will be incorporated into the design.

#### Flooding

The potential stormwater and flooding impacts of development within the LHIBH were subject to a detailed assessment within the original Concept DA. The architectural plans to be submitted with the SSDA for Proposed Lot 2 will demonstrate the proposal complies with the relevant Concept Plan approval (as modified) including the finished floor levels and flood emergency egress provisions.

#### Dangerous Goods

A preliminary hazard assessment (**PHA**) will be prepared as part of the EIS for the proposed development, consistent with the requirements of the *State Environmental Planning Policy (Resilience and Hazards) 2021 (R&H SEPP)*. The assessment will be undertaken in accordance with the *Hazardous and Offensive Development Application Guidelines: Applying SEPP 33 (DoP 2011)*. The PHA will assess the potential impacts associated with the proposed anhydrous ammonia refrigeration system. Anhydrous ammonia is a Class 2.3 toxic gas and is subject to Chapter 3 of the R&H SEPP (formerly known as *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development (SEPP 33)*) which is a threshold-based risk assessment to determine whether the facility is acceptable for the land use.

A review of the quantities of dangerous goods (**DGs**) stored at the proposed facility and the associated vehicle movements has been undertaken for the proposal to compare the threshold quantities outlined in the former SEPP 33. The results indicate that the threshold quantities for the DGs to be stored and transported are not exceeded. Accordingly, Chapter 3 of the R&H SEPP does not apply to the proposal. Therefore, as the facility is not classified as potentially hazardous or offensive and Chapter 3 does not apply, it is not necessary to prepare a Preliminary Hazard Analysis for the facility.

Regardless of the above, all DGs will be stored in accordance with the *Work Health and Safety Regulation 2017* and any documentation required by the applicable regulatory framework shall be prepared prior to occupying the space containing the DGs.

### 6.1.9. Infrastructure Requirements

The Civil Engineering report lodged with the Concept DA provided a detailed assessment of the infrastructure requirements for the proposal, including the potential demands generated by the future industrial development and as summarised below:

- **Water:** potable water supply can be provided from the Sydney Water mains via a new connection to the existing 250mm diameter main located in Wallgrove Road or a 299mm diameter main in Ferrers Road.
- **Sewer:** a gravity sewer connection can be provided to the Sydney Water mains via the north-south sewer main or a 375mm diameter sewer main that drains around the north western corner of the site to the east and connects to the 600mm diameter sewer main at the northern end of the site.
- **Gas:** the proposed subdivision and internal road layout has been designed to accommodate the 500mm diameter Jemena high pressure gas main and associated 20 metre wide easement.

- **Power:** Endeavour Energy will require a Level 3 Service Provider to further assess the capacity of the existing system and the requirements for the infrastructure to service the proposed development. Preliminary advice indicated a new underground feeder from Northern Eastern Creek Zone Substation could facilitate supply.

A supplementary or updated utility services report may be lodged with the Modification Application (to be lodged concurrently) to confirm the additional GFA can be accommodated within the original planned upgrades. The approved stormwater management system may also be amended in association with the concurrent Modification Application (Mod 3). However, it is not expected that there will be any major implications for the siting and design of the proposed warehouse or distribution centre development on Proposed Lot 2.

### 6.1.10. ESD

An Ecologically Sustainable Development (**ESD**) report will detail the ESD initiatives to be incorporated within the project. It will identify potential measures to be implemented into the building design and construction to minimise the environmental footprint of the development.

### 6.1.11. Economic Impacts

The EIS will identify the economic impacts of the proposal, including the delivery of employment generating industrial floor space and employment opportunities within the Blacktown LGA.

### 6.1.12. Access

It is expected that an Accessibility Report may be required to assess how the development complies with the accessibility requirements, including the *Disability Discrimination Act 1992*, National Construction Code and relevant Australian Standards. This is a standard requirement for an SSDA and is not expected to require a detailed assessment.

### 6.1.13. Waste

A Waste Management Plan will be prepared for the construction and operational phases of the development, including waste management practices. Where possible, all demolition, construction and operational waste will be reused or recycled. The waste management plan will be undertaken in accordance with the *Waste Classification Guidelines* (DECCW, 2009).

## 6.2. MATTERS REQUIRING NO FURTHER ASSESSMENT IN THE EIS

This section of the report identifies the matters that do not require further assessment in the EIS. Each of these matters was considered within the scoping phase but considered unlikely to result in significant impacts that warrant further assessment.

- **Biodiversity:** the proposed development does not seek to amend the developable area or vegetation removal as originally approved within the Concept DA. Accordingly, there are no additional impacts from the proposed modifications or Proposed Lot 2 development which need to be addressed.
- **Aboriginal Cultural Heritage:** the proposed development does not seek to amend the developable area or the mitigation measures established within the assessment of the original Concept DA. Accordingly, there are no additional impacts from the proposed modifications or Proposed Lot 2 development which need to be addressed.
- **Environmental Heritage:** the proposed development does not seek to amend the developable area or the mitigation measures established within the assessment of the original Concept DA. Accordingly, there are no additional impacts from the proposed modifications or Proposed Lot 2 development which need to be addressed.
- **Ground and Water Conditions:** the Concept DA provided a comprehensive assessment of the suitability of the site to accommodate the proposed development. Accordingly, it is considered that further detailed site investigations should not be required as part of the SSDA for Proposed Lot 2.
- **Contamination and Remediation:** the proposed development does not seek to amend the developable area or the mitigation measures established within the assessment of the original Concept DA.

Accordingly, there are no additional impacts from the proposed modifications or Proposed Lot 2 development which need to be addressed.

- **Social Impact:** it is considered the proposal is generally consistent with the type and scale of development delivered in accordance with the Concept Approval. Accordingly, a Social Impact Assessment should not be required for the Proposed Lot 2 SSDA.

# APPENDIX A

# QS REPORT

**APPENDIX B**

**ARCHITECTURAL PLANS**

# APPENDIX C

# SCOPING REPORT SUMMARY TABLE

# DISCLAIMER

This report is dated 30 September 2022 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Woolworths Group Limited (**Instructing Party**) for the purpose of Scoping Report (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

In preparing this report, Urbis may rely on or refer to documents in a language other than English, which Urbis may arrange to be translated. Urbis is not responsible for the accuracy or completeness of such translations and disclaims any liability for any statement or opinion made in this report being inaccurate or incomplete arising from such translations.

Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above



