

**ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000**

URBIS.COM.AU
Urbis Pty Ltd
ABN 50 105 256 228

19 October 2022

Michael Cassel
Secretary - Department of Planning & Environment
4 Parramatta Square, 12 Darcy Street
Parramatta, NSW, 2150

Attn: Chris Ritchie - Director, Industry Assessments at DPE

Dear Chris,

REQUEST FOR INDUSTRY SPECIFIC SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS | 297 KING STREET, MASCOT

This letter has been prepared by Urbis Pty Ltd (**Urbis**) on behalf of LOGOS Property Group (**LOGOS**) to provide a detailed description of the proposed warehouse and distribution facility at 297 King Street, Mascot.

It has been prepared to respond to a request for further information from the Department of Planning and Environment in issuing industry-specific Secretary's Environmental Assessment Requirements (**SEARs**)

1. APPLICANT DETAILS

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

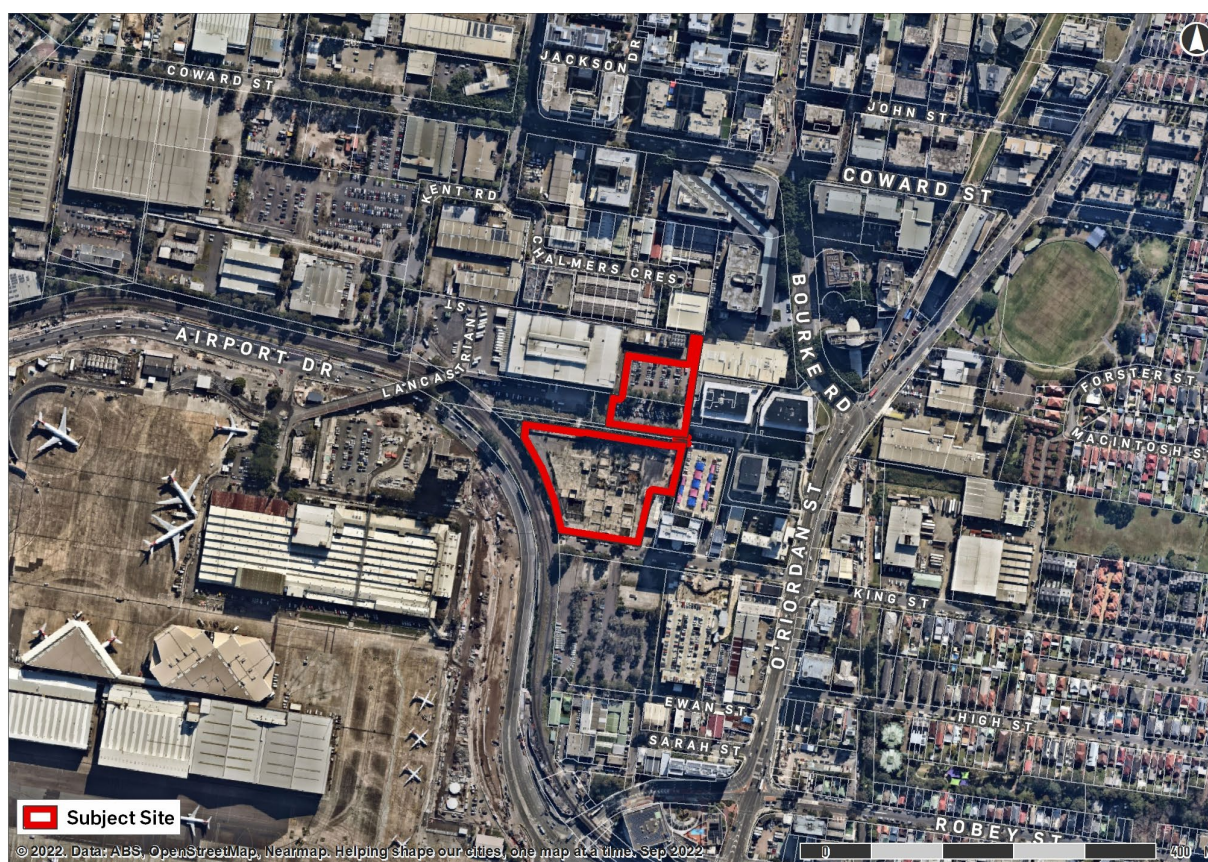
Table 1 Applicant Details

Descriptor	Proponent Details
Full Name(s)	LOGOS Development Management Pty Ltd
Postal Address	LOGOS Property Group Level 29, 88 Phillip Street, SYDNEY NSW 2000
ABN	20 602 048 555
Nominated Contact	Mark Linfoot General Manager Development - NSW
Contact Details	+61 2 8197 3900

2. SITE DESCRIPTION

The site is located at 297 King Street, Mascot, within the Bayside local government area (LGA). The site is legally described as Lot 4 in Deposited Plan (DP) 234489 and Lot 103 in DP 1282564. The location of the site is illustrated in **Figure 1**.

Map 1 Local Context



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. Photographs of the site and locality are provided as **Figure 2**.

Table 2 Key Features of Site and Locality

Descriptor	Site Details
Land Configuration	The site is approximately of 2.57ha in size and is a largely level site with an RL 3m AHD at the northern periphery to RL 6m AHD to the southern periphery. The site has a minor slope from west to east, with an RL 3.5m AHD at the western periphery to 5m AHD at the eastern periphery.

Descriptor	Site Details
Land Ownership	The site is owned by LOGOS following the recent purchase of the land from Qantas.
Existing Development	<p>The site is characterised by its existing site improvements. The northern lot includes an at-grade carpark for the Qantas catering facility and tri-generation plant.</p> <p>The southern site accommodates site preparation works, including footings and hardstand areas, associated with the approved Qantas Flight Training Centre (SSD-10154). The project was discontinued in 2020 due to the COVID-19 pandemic.</p>
Local Context	<p>The surrounding locality is described below:</p> <ul style="list-style-type: none"> ▪ North: The site is bound to the north by low scale industrial development, beyond which is Coward Street. Further north of the site is the Mascot Town Centre, which is characterised by transport-oriented development including high density mixed-use development around the Mascot Train Station. ▪ East: The site is bordered to the east by commercial development including a Travelodge which includes a commercial car park and the AMP/Goodman Connect Corporate Campus. Further east is more commercial development including the Ibis Hotel and Pullman Sydney Airport and O'Riordan Street. To the north-east of the site is the Qantas Corporate Campus. ▪ South: The site is bounded to the south by King Street, beyond which is Qantas owned at-grade car parking and other industrial uses. Further south is the Botany freight rail line and Qantas Drive beyond, which currently provides access to the Domestic Terminal of Sydney Kingsford Smith Airport (the Airport). ▪ West: The site is bordered to the west by the Botany Freight Rail Line and Qantas Drive, beyond which lies the Airport and the Qantas Jetbase. Construction works associated with the Sydney Gateway Project and Botany Rail Duplication is underway to the west of the site. <p>Photographs of the surrounding land uses are provided as Figure 2.</p>
Regional Context	The site is located approximately 7km south-west of the Sydney Central Business District (CBD). It is immediately adjacent (north-east) to the Airport and the Botany freight rail corridor, and is sited between major

Descriptor	Site Details
	<p>roads including Qantas Drive, O’Riordan Street, and Bourke Road. Alexandra Canal is approximately 650m to the north-west.</p> <p>Its immediate context is commercial and industrial development in nature, much of which is associated with operations of the Airport and Qantas. Further east across O’Riordan Street, land use is primarily residential development.</p>
Infrastructure	<p>The site is within a significant infrastructure corridor adjacent to several major transport connections. The location is considered highly appropriate for a warehouse and distribution centre given the direct interactions with the following:</p> <ul style="list-style-type: none"> ▪ Sydney Kingsford Smith Airport; ▪ Port Botany Rail Line; ▪ T8 Railway Line; ▪ Sydney Gateway Project; ▪ St Peters Interchange; and ▪ M8 Motorway. <p>The site benefits from bus and train public transport services in close proximity to the site. A bus stop is located on O’Riordan Street approximately 350m to the east. This bus stop services the 305-bus route which connects to Redfern Station. Mascot Train Station is located 700m to the north of the site and is serviced by the T8 Airport & South Line, providing access to surrounding suburbs, Sydney CBD, and Sydney’s southern suburbs to Macarthur.</p>
Site Access	<p>Pedestrian and vehicular access to the site from the local road network is available from King Street.</p>
Easements and Covenants	<p>The site is bisected by a Sydney Water easement which runs from east to west.</p>
Services	<p>The site is within an established industrial area with availability to existing infrastructure and utility services.</p>
Acid Sulfate Soils	<p>The site is identified as Class 2 land.</p>

Descriptor	Site Details
Contamination	A Detailed Site Investigation was prepared for the approved flight training centre on the site (SSD-10154). The site has an extensive history of farming and agriculture, manufacturing, and commercial/industrial land purposes. Contaminants of potential concern associated with historical land uses are known to occur within the site.
Stormwater and Flooding	<p>Existing stormwater infrastructure drains through to the open drainage channel, owned by Sydney Water that bisects the site.</p> <p>A previous flood study was undertaken by WMA Water in 2015 for Mascot, Roseberry and Eastlakes. This report, as well as advice from Bayside Council (Council), found that the northern portion of the site was impacted by the 1% AEP and is subject to inundation due to flooding from overland flow in the 1% AEP events. The report states that <i>“the flood impact to the northern portion of the site was considered to be only Flood Fringe which places the site in a low hazard category”</i>.</p>
Bushfire Prone Land	The site is not identified as bushfire prone.
Flora and Fauna	The current site mostly consists of impervious areas including an at-grade carpark and large areas of hardstand. A variety of native and exotic trees and vegetation are planted around the perimeter of the site which help screen the site from surrounding uses. Multiple mature Plane Trees are also scattered throughout the southern part of the site.
Aboriginal Heritage	Based on previous Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared for SSD-10154 there is no indication that items of Aboriginal heritage significance are likely to be present on the site.
European Heritage	The site does not include any items of identified built heritage significance, however it is proximate to three local heritage items located within the boundary of Sydney Airport. The items are the Sydney (Kingsford Smith) Airport Group, Ruins of the former Botany Pumping Station and the Commonwealth Water Pumping Station and Sewage Pumping Station.

Figure 1 Site and Locality Photographs



Picture 1 Eastern boundary facing north to Qantas Corporate Campus with tri-generation plant



Picture 2 North-east corner of the site showing two-way driveway connecting to Mascot Campus



Picture 3 Eastern boundary showing existing at-grade car parking, Catering Facility and tri-generation plant



Picture 4 Travelodge to the east of the site

3. DEVELOPMENT DESCRIPTION

The key components of the proposed development are listed in the following table. A copy of the architectural concept drawings is submitted with the request for SEARs.

Table 3 Project Details

Descriptor	Project Details
Project Area	The site has a total area of 2.6ha. This is made up of 8,585m ² for the northern lot and 1.72ha for the southern lot. The entire site area will be physically disturbed by the Project
Project Description	<p>The Project comprises the demolition of existing structures and hardstand and site enabling works, and construction of the following:</p> <ul style="list-style-type: none"> ▪ Warehouse and distribution centre within the southern lot; and ▪ At-grade car park with 179 spaces within the northern lot. <p>Key components of the multi-level warehouse development include:</p> <ul style="list-style-type: none"> ▪ Maximum building height of 44m (5 storeys). ▪ Total GFA of 31,254m², comprising: <ul style="list-style-type: none"> - Warehouse: 26,318m² - Ancillary office: 4,934m² ▪ New landscaping throughout the site.
Vehicle Access	<ul style="list-style-type: none"> ▪ Three access points from King Street provide for entry/exit of light and heavy vehicles as follows: <ul style="list-style-type: none"> - Dedicated entry/exit for heavy vehicle access with nominated area for queuing. - Dedicated entry/exit for light vehicles to access the carpark. - Fire truck access which may also be used as a secondary light vehicle access. ▪ There is also an existing easement which provides access from the development site to Kent Road via Lot 104 in Deposited Plan 1282564 (also referred to as 65 Kent Road, Mascot) which is currently owned by Qantas. LOGOS is working with Qantas to determine the future strategy for this access. Any proposed

Descriptor	Project Details
	access arrangements via this easement will be documented as part of the SSDA.
Proposed Activities	<ul style="list-style-type: none"> LOGOS has confirmed that there are no known tenants at this stage. The proposed development is in the early stages of marketing for the site. The ground level is currently provided as a single tenancy with two tenancies on the levels above, each with ancillary offices. However, it is acknowledged that each of the tenancies could be modified by either being consolidated into a single tenancy or split into additional tenancies depending on future tenant requirements. Further consideration is given to the potential future activities having regard to the relevant land use definitions and likely market/tenant demand as described in additional detail in point 2 on the following page.
Permissibility	The proposed 'warehouse and distribution centre' is permissible with consent within the IN1 General Industrial Zone under the <i>Bayside Local Environmental Plan 2021</i> (BLEP 2021).
Expected Capital Investment Value	\$94,130,000.00 (excluding GST) - refer to QS report submitted with the SEARs request.
Staging/Phasing	<ul style="list-style-type: none"> Construction: single staged development program over approximately 12 months utilising pad footings and concrete floor and steel portal frame construction with concrete walls and metal sheeting above. Conventional construction will be implemented using earth moving equipment, mobile cranes, concrete mixers, and other appropriate construction vehicles, facilitated by the appropriate trades and labour. Construction will occur generally within standard hours, with potential for specific activities (e.g. concrete pours) outside of standard hours to optimise climatic conditions for quality control. Operation: 24 hours per day, seven days a week.

4. STATE SIGNIFICANT DEVELOPMENT AND RAPID ASSESSMENT FRAMEWORK

4.1. SSD CLASSIFICATION

Pursuant to Schedule 1, Clause 12 of *State Environmental Planning Policy (Planning Systems) 2021* (**Planning Systems SEPP**), development for the purpose of 'warehouse or distribution centres (including container storage facilities)' at one location and which relates to the same operation that has a CIV of more than \$30 million is considered State Significant Development (SSD).

The proposed development is classified as an SSD application given the proposed development is for the purposes of a multi-level industrial warehouse and distribution facility and the CIV is greater than \$30 million (approximately \$106.5 million).

4.2. PROJECT ELIGIBILITY FOR INDUSTRY-SPECIFIC SEARS

DPE have introduced the Rapid Assessment Framework (**RAF**) to streamline the assessment of major projects. As part of implementing the RAF, DPE have prepared and introduced ready-made industry-specific SEARs. The industry-specific SEARs apply to SSDAs that:

- are wholly permissible;
- do not meet thresholds for designated development; and
- are not a concept development application.

Industry-specific SEARs have been prepared for various types of development including 'warehouses and distribution centres'. The BLEP 2021 defines a 'warehouse or distribution centre' as follows:

warehouse or distribution centre means a building or place used mainly or exclusively for storing or handling items (whether goods or materials) pending their sale, but from which no retail sales are made, but does not include local distribution premises.

We submit that the proposed development is eligible for industry-specific SEARs:

- The proposal is for the construction and use of a multi-level industrial 'warehouse and distribution centre' in accordance with the land use definitions under the BLEP 2021;
- The proposed warehouse and distribution centre is permissible with consent within the IN1 General Industrial Zone under the BLEP 2021;
- The proposal is not designated development as set out within the *Environmental Planning and Assessment Act 1979* (**EP&A Act**); and
- The proposed development is a detailed development application involving the 'carrying out of development' and is not for the purposes of a concept development application as described in section 4.22 of the EP&A Act.

5. DESIGN EXCELLENCE STRATEGY

The site has been identified on the Design Excellence Map under the BLEP 2021 and therefore sub-clause 6.10(5) and (6) of BLEP 2021 apply as follows:

(5) Development consent must not be granted to development to which this clause applies unless—

(b) if the development is in respect of a building that is, or will be, higher than 40 metres or 12 storeys (or both)—

(i) an architectural design competition is held in relation to the development, and

(ii) the consent authority takes into account the results of the architectural design competition.

(6) Subclause (5)(b) does not apply if—

(a) the NSW Government Architect certifies in writing that an architectural design competition need not be held but that a design review panel should instead review the development, and

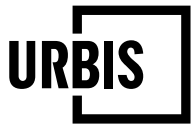
(b) a design review panel reviews the development, and

(c) the consent authority takes into account the findings of the design review panel.

LOGOS has had ongoing consultation with the DPE, Council and Government Architect NSW (**GANSW**) to discuss the appropriate design excellence pathway for the Project.

The GANSW confirmed in writing on 13 September 2022 (email correspondence from Rory Toomey, Principal Design Excellence) that the required design competition can be waived in accordance with sub-clause 6.10(6)(a) of the BLEP 2021. The GANSW has also advised that a State Design Review Panel (SDRP) review process is the appropriate design excellence pathway.

Council has agreed to this preferred approach as confirmed in writing on 15 September 2022 (email correspondence from Josh Ford, Coordinator Planning Policy).



6. CONCLUSION

We trust the information provided with this letter provides sufficient details to provide DPE with a comprehensive understanding of the proposed development to facilitate the issue of industry-specific SEARs.

If you require any further information, please do not hesitate to contact me on the details below or Jennifer Cooper (Director) on 02 8233 9931 or jcooper@urbis.com.au.

Kind regards,

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

Erin Dethridge
Associate Director
+61 2 8233 7671
edethridge@urbis.com.au