

WALLGROVE BUSINESS HUB SCOPING REPORT

PROJECT SPECIFIC SEARS REQUEST

Western Sydney Parklands Trust
November 2022

Acknowledgment of Country

Western Sydney Parklands Trust acknowledges that the Parklands is situated within the boundaries of the Deerubbin and Gandangara Local Aboriginal Land Councils. The Deerubbin, Gandangara and Darug peoples are the Traditional Owners of this land. Western Sydney Parklands Trust also acknowledges the Aboriginal and Torres Strait Islander people who now reside within this area.

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1. Introduction

1.1. Overview

This Scoping Report has been prepared on behalf of Western Sydney Parklands Trust (WSPT). This Scoping Report is prepared in accordance with the *'State Significant Development Guide: Preparing a Scoping Report'* as part of the process to obtain project-specific Secretary's Environmental Assessment Requirements (SEARs) to guide the preparation of an Environmental Impact Statement (EIS) for a business hub at 97-151 Wallgrove Road, Cecil Park, within the Western Sydney Parklands (Parklands) and in the Fairfield City local government area.

This report will:

- describe the project
- include an analysis of feasible alternatives
- provide an overview of consultation to date and identify what engagement will be carried out during the preparation of the EIS
- identify the key matters requiring further assessment in the EIS and the proposed approach to assessing each of these matters.

A scoping summary table is provided at **Appendix A**.

1.2. Applicant Details

The details of the applicant, Western Sydney Parklands Trust, are outlined in the Table 1:

Table 1: Applicant details

Applicant	Western Sydney Parklands Trust
ABN	85 202 544 800
Address	PO Box 3064 Parramatta NSW 2124
Contact	Tim Colless
Contact Details	tim.colless@gsp.nsw.gov.au

1.3. Project Objectives and Background

The proposed redevelopment of the site to accommodate the Wallgrove Business Hub is intended to achieve the following objectives:

- provide an ongoing revenue stream for the Western Sydney Parklands Trust to support the Parklands operations and maintenance and the development of new and existing facilities
- deliver economic benefits and employment generation for Western Sydney and the Greater Sydney Region
- incorporate specialist technical input to provide a holistic response to the careful siting and design of the industrial subdivision and for the future construction of the buildings
- avoid unacceptable environmental impacts through adopting recommended measures to avoid, minimise or manage potential impacts.

The WSPT is a self-funded Government agency which was formed by the NSW Government in 2006. The *Western Sydney Parklands Plan of Management 2030* (POM 2030) identifies the vision for the Parklands, strategic directions to ensure the vision is achieved, and a land use framework and management guidelines for each of the sixteen precincts.

The POM 2030 identifies locations within the Western Sydney Parklands precincts which have low environmental or recreational value and are suitable for the establishment of business hubs. These areas will 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 proposed Wallgrove Business Hub is located within the Precinct 11 Cecil Park North precinct and is identified by the POM 2030 and the precinct plan as a location for investigation for a Business Hub. The proposed Wallgrove Business Hub forms an important component of the self-funded model for the WSPT.

1.4. Project Summary

Development consent is being sought for a concept proposal for the staged redevelopment of the site as an industrial business hub and a detailed proposal for the first stage of works.

Key features of the concept proposal include:

- two industrial, warehouse and distribution building footprints to accommodate a range of land uses including light industrial, warehouse and distribution facilities and ancillary office facilities
- approximately 34,000 square metres of floorspace across different buildings/ tenancies
- concept architectural design for the future built form, and landscape concept design
- access road to the proposed business hub off Wallgrove Road
- stormwater management works to manage the quality and quantity of water flows across the site and avoid adverse impacts to adjoining properties
- delivery of utility services required to service the proposed development, including necessary upgrades and siting and design of the proposed industrial subdivision.

The first stage of works (Stage 1 DA) will include:

- the site preparation and bulk earthworks including site clearing to establish the future development sites
- provision of an access road to connect to Wallgrove Road, for dedication to Council
- installation of site services and stormwater management infrastructure to accommodate the future development of the site
- Torrens title subdivision to create separate development lots, and dedication of road to Council.

The future industrial buildings and associated facilities will be subject to separate future development applications (DAs) and do not form part of this application.

This concept proposal may be varied to accommodate requirements of detailed investigations and to address stakeholder issues.

Section 3 includes a more detailed description of the proposal and preliminary plans prepared by Watson Young Architectural are at **Appendix B**.

The estimated Capital Investment Value (CIV) for the first stage of works is \$11.4 million (see Appendix C), with the CIV for the concept development application estimated at more than \$30 million. Section 4.36(2) of the *Environmental Planning and Assessment Act 1979* (EP&A Act) provides that:

(2) A State environmental planning policy may declare any development, or any class or description of development, to be State significant development

The project is classified as State significant development (SSD) under section 4.36 of the EP&A Act as the development has a CIV in excess of \$10 million and is within the Western Sydney Parklands, an identified site under Schedule 2 of the *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP).

The Minister is the consent authority for the proposal in accordance with section 4.5(a) of the *Environmental Planning and Assessment Act 1979* (EP&A Act). Accordingly, a State Significant Development Application (SSDA) will be lodged with DPE seeking development consent for the proposal.

The SSDA Site details are provided in Table 2. A detailed description of the key features of the site and locality is provided in Section 2.2 of this report.

Table 2: SSDA Site description

Address	Legal Description	Site Area (estimate)
97-123 Wallgrove Road, Cecil Park	Part Lot 25 Sec.4 in DP2954	2.8 ha
125-151 Wallgrove Road, Cecil Park	Part Lot 24 in DP1152887	4.4 ha
Total		7.2 ha

A map showing the location of the site in its regional setting within the Western Sydney Parklands is provided in Figure 1.

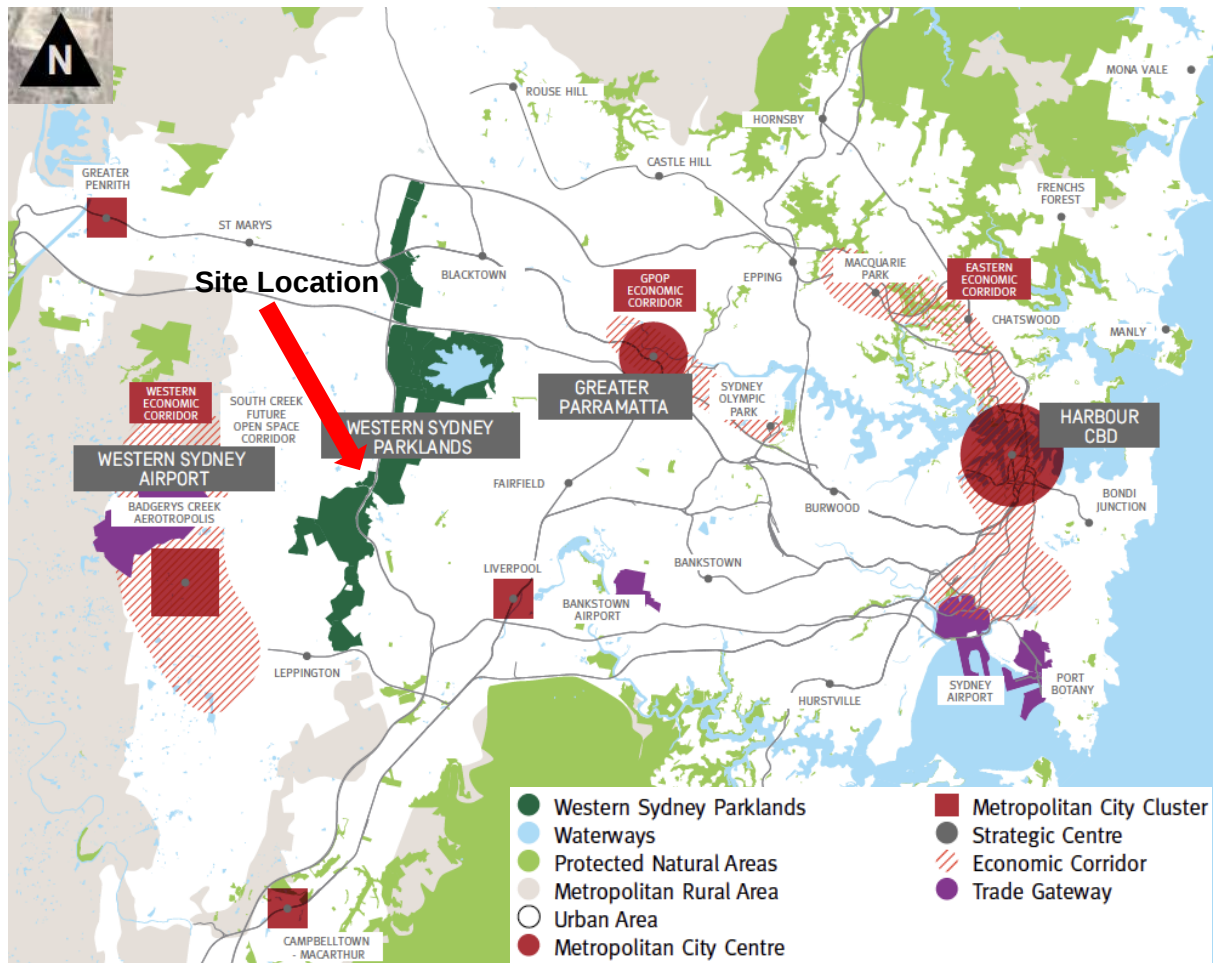


Figure 1: Regional context

(Source: Western Sydney Parklands Plan of Management 2030)

2. Strategic Context

2.1. Project Justification

The proposed redevelopment of the site to accommodate the Wallgrove Business Hub is consistent with planning for the Western Sydney Parklands, important as a means to achieving financial sustainability and to generate revenue to support the parklands operations. The proposal is consistent with the *Western Sydney Parklands Act 2006*, *State Environmental Planning Policy (Precincts – Western Parkland City) 2021* (WPC Precincts SEPP), *Western Sydney Parklands and Western Sydney Parklands Plan of Management 2030* (POM 2030), as discussed below.

- The proposal is consistent with the *Western Sydney Parklands Act 2006* as:
 - the functions of the Act include the provision of commercial facilities in or in relation to the Parklands with the object of supporting the viability of the management of the Parklands
 - it requires that WSPT must have an approved plan of management, and give effect to that plan
 - it requires that the Trust exercises functions in accordance with the plan of management and give effect to each precinct plan.
- The proposal is consistent with WPC Precincts SEPP, Chapter 7 Western Sydney Parklands which:
 - aims include allowing for a range of commercial, retail, infrastructure and other uses
 - zones the land to permit the proposed use.
- The proposal is consistent with the POM 2030 as it:
 - contributes to the plan's strategic direction for financial sustainability and economic development, to create a sustainable revenue base for WSPT to develop and manage strategic and operational expenditure
 - is consistent with the intention to achieve a sustainable business model by establishing WSPT Business Hubs with income-generating leases on up to 2% of the Parklands to support the ongoing development and management of the Parklands
 - is located on land with lower environmental and recreational value, and contributes to economic development, employment and training in Western Sydney
 - is consistent with the identification of the potential business hub, in the Cecil Park North Precinct Plan (see Figure 2).

The project is consistent with previous SSDAs for business hubs within Western Sydney Parklands including:

- SSD 5169 - Horsley Drive Business Hub, Fairfield LGA
- SSD 5175 - Eastern Creek Business Hub, Blacktown LGA
- SSD 6324 - Bringelly Road Business Park, Liverpool LGA
- SSD 6407 - Fifteenth Avenue Commercial Hub, Liverpool LGA
- SSD 7664 - Horsley Drive Business Park Stage 2, Cowpasture Road, Wetherill Park, Fairfield LGA
- SSD 9667 - Light Horse Interchange Business Hub, Eastern Creek, Blacktown LGA.

The Wallgrove Business Hub is proposed to be the final business hub to be planned for delivery, consistent with the POM 2030's 2% target to ensure financial sustainability for the Parklands.

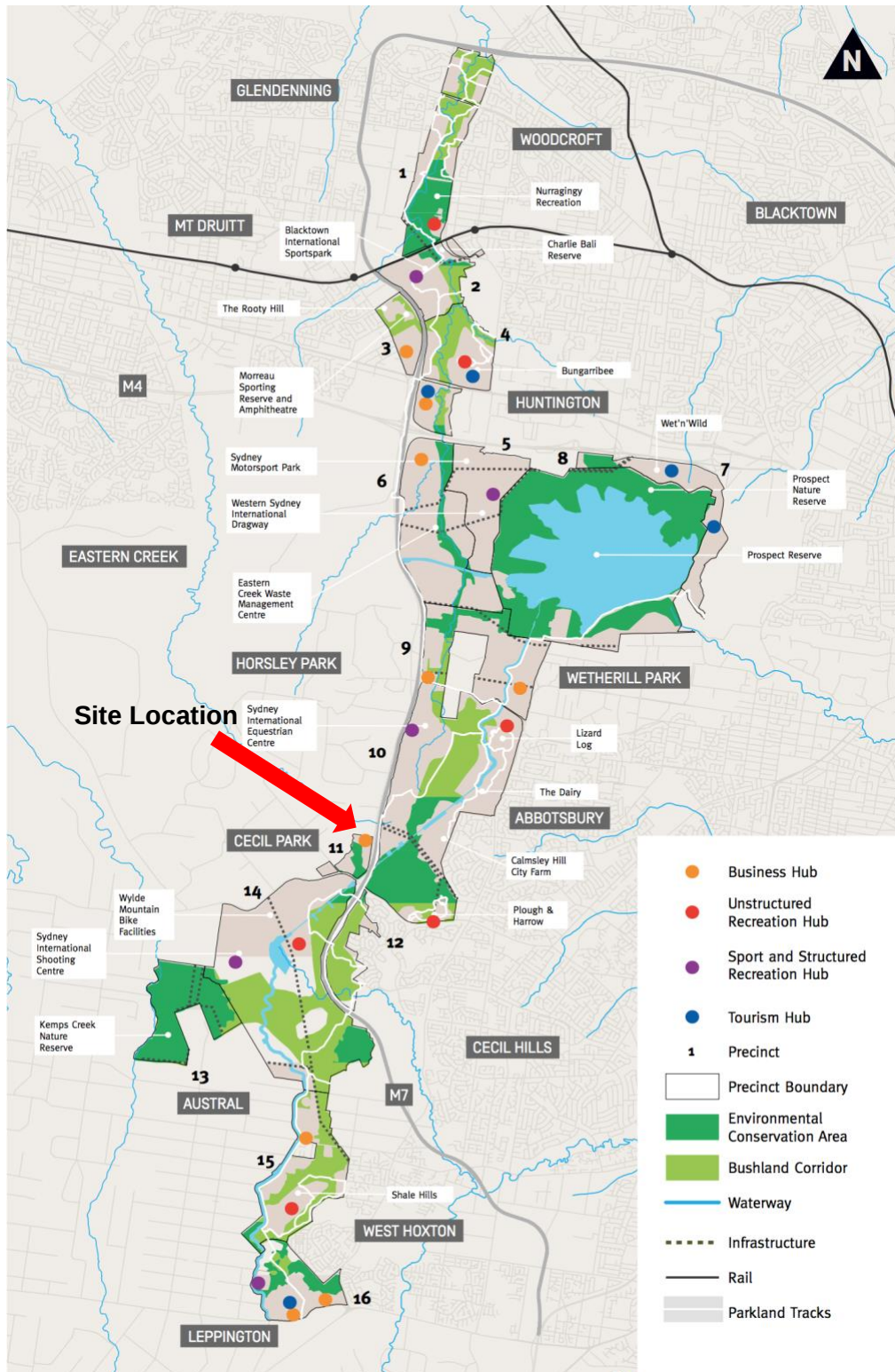


Figure 2: Location of business hubs within Western Sydney Parklands (including Wallgrove Business Hub)

(Source: Western Sydney Parklands Plan of Management 2030, WSPT)

2.2. Key features of the site and surrounds

2.2.1. Locality

The SSDA Site is located at 97-151 Wallgrove Road Cecil Park (being Part Lot 25 Sec.4 DP2954 and Part Lot 24 DP1152887). The site is owned by the WSPT, is located within the Fairfield local government area, and is within the Western Sydney Parklands.

Western Sydney Parklands (Parklands) is the largest urban parkland in Australia and covers 5,280 hectares, stretching 27 kilometres from Quakers Hill to Leppington. Over the last 50 years the NSW Government has been progressively conserving this open space for recreation, sport, environment, community facilities, agriculture, business, infrastructure and services for the growing population of Western Sydney.

The location of the SSDA Site within the Parklands is shown in red in the aerial photo at Figure 3. The site is located approximately 500m north of Elizabeth Drive and the proposed M12 Motorway, to the west of the M7 Motorway and Wallgrove Road. The property has great access to the road network, with a ramp to the M7 Motorway from Wallgrove Road located within 100m south of the site.

A tributary of Ropes Creek is located west of the site. Land to the north and further west of the site is not within the Parklands, and is therefore subject to *Fairfield Local Environmental Plan 2013* (Fairfield LEP 2013). This adjacent land is primarily zoned RU4 Primary Production Small Lots under the Fairfield LEP 2013, with a minimum subdivision size of 1 ha. There are rural dwellings located within 100m to the west, accessed off Cecil Road, and to the north, accessed off Kosovich Place. This area adjacent to the site is part of the Horsley Park and Cecil Park Urban Investigation Area, with the preferred structure plan (2019) for the land identifying small lot single dwelling housing as the preferred future use. No. 17-19 Kosovich Place, located adjoining the north-west boundary of the site, has development consent for the staged construction of a new Saints Peter and Paul Assyrian Primary School, intended to cater for up to 630 students (SSD-9210).



Figure 3: Site context
(Source: Nearmap and WSPT)

The SSDA Site is within the Cecil Park North precinct of the Parklands, a 65 hectare area that is isolated from the main parklands by the M7 Motorway and Elizabeth Drive (see Figure 4). The site will be further isolated from adjoining Parklands by the proposed M12 Motorway and the realignment of Wallgrove Road through this precinct, immediately south of the site.

The SSDA Site does not include the proposed Bushland Corridor, as identified within the Cecil Park North Precinct Plan, or the riparian corridor associated with the Ropes Creek tributary. These areas will remain within the Western Sydney Parklands to be protected and enhanced consistent with the *Western Sydney Parklands Biodiversity Strategy* (Biodiversity Strategy) and the POM 2030. The Biodiversity Strategy provides the framework for WSPT's development and management of environmental assets within the Parklands and the POM 2030 establishes strategic directions and objectives to increase and improve bushland biodiversity.

In the ten years preceding endorsement of the POM 2030 in 2018, WSPT had spent \$8.5 million improving biodiversity and environmental conservation in the Parklands. Since 2012 and the release of the Biodiversity Strategy, WSPT has committed to spend \$10 million until 2050 to reach the goal of creating 2,000 hectares of bushland. WSPT will be ensuring protection and enhancement of biodiversity throughout the Parklands and will continue to manage these areas for the benefit of Western Sydney residents.

WSPT has been actively managing and enhancing the area of the bushland corridor adjacent the SSDA Site and will resume these works upon completion of the M12 Motorway project.



Figure 4: The SSDA Site within the Cecil Park North Precinct
(Source: *Western Sydney Parklands Plan of Management 2030*)

The SSDA Site is located approximately 9km from the Western Sydney Airport, and is located within Western Sydney Airport Obstacle Limitation Surface of RL230.5m AHD and is within the 13km Wildlife Buffer zone. The proposed development and land uses will not trigger development controls for airport safeguarding within WPC Precincts SEPP, Chapter 4 Western Sydney Aerotropolis.

2.2.2. Site dimensions and improvements

The SSDA Site has a total frontage to Wallgrove Road of approximately 280 metres, a depth from Wallgrove Road to the west of 160-310 metres, and a site area of approximately 7.2 hectares. The southern lot, 97-123 Wallgrove Road, includes a dwelling on the southern boundary and a farm dam, with access from Wallgrove Road.

2.2.3. Topography

The SSDA Site is relatively flat with a fall toward the Ropes Creek tributary from the south-east to the north-west, with two minor valleys running east to west through each lot. The site surface levels range from approximately RL116.000m AHD in the south-eastern corner to RL92.000m AHD in the north western corner.

2.2.4. Vegetation

The SSDA Site includes native vegetation (Grey Box Forest Red Gum). A pocket of native vegetation is located on the southern lot near Wallgrove Road. The northern lot has some scattered trees across the site.

2.2.5. Bushfire

The SSDA Site is within a designated bushfire prone area primarily within a Vegetation Category 3 area, with some land at the western periphery of the site identified as Vegetation Category 1.

2.2.6. Flooding

The SSDA Site is partly affected by flooding of the Ropes Creek tributary which is located west of the site. This flooding is a combination of mainstream and local overland flow from the site itself. The SSDA Site is affected by low risk flooding, with land directly to the west identified as being medium risk. The medium risk is flooding that is up to the 100 Year Annual Recurrence Interval (ARI) event, with the low risk being flooding up to the Probable Maximum Flood (PMF) event.

2.2.7. Heritage

The SSDA site does not contain any items of environmental heritage identified in an environmental planning instrument or any Aboriginal sites that are identified on the Aboriginal Heritage Information Management System (AHIMS) register.

2.2.8. Utilities and infrastructure

An existing high voltage 11kV feeder is located in the Wallgrove Road reserve along the frontage of the site. The site does not currently have access to potable water or sewer. A 500mm trunk water main is located on the Wallgrove Road frontage, and a high pressure trunk gas main is located adjacent to the frontage of the site. The site is not currently serviced by any formal stormwater drainage network.

3. Project

Development consent is being sought for a concept proposal for the staged redevelopment of the site as an industrial business hub and a detailed proposal for the first stage of works.

Key features of the concept proposal include:

- two industrial, warehouse and distribution building footprints to accommodate a range of land uses including light industrial, warehouse and distribution facilities and ancillary office facilities
- approximately 34,000 square metres of floorspace across different buildings/ tenancies
- concept architectural design for the future built form, and landscape concept design
- access road to the proposed business hub off Wallgrove Road
- stormwater management works to manage the quality and quantity of water flows across the site and avoid adverse impacts to adjoining properties
- delivery of utility services required to service the proposed development, including necessary upgrades and siting and design of the proposed industrial subdivision.

The first stage of works (Stage 1 DA) will include:

- the site preparation and bulk earthworks including site clearing to establish the future development sites
- provision of an access road to connect to Wallgrove Road, for dedication to Council
- installation of site services and stormwater management infrastructure to accommodate the future development of the site
- Torrens title subdivision to create separate development lots, and dedication of road to Council.

The future industrial buildings and associated facilities will be subject to separate future development applications (DAs) and do not form part of this application.

3.1. Site Layout

A set of Preliminary Architectural Drawings have been prepared by Watson Young Architects and are provided at **Appendix B**, with a plan of the concept proposal provide in Figure 5 below.

The main elements of the concept proposal include:

- access to the site off Wallgrove Road at the northern boundary, with a turning head in the middle of the site
- Building 1, located adjacent to Wallgrove Road, with industrial/warehouse space of approximately 24,270m², with ancillary office spaces
- Building 2, setback approximately 230m from Wallgrove Road, with industrial/warehouse space of approximately 9600m² and with ancillary office spaces
- loading docks, truck hardstand areas and carparking areas.

This concept proposal may be varied to accommodate requirements of detailed investigations and to address stakeholder issues.

Native vegetation on the SSDA Site within the development footprint is not proposed to be retained. The SSDA Site boundaries exclude the areas with the most significant vegetation for the proposed Bushland Corridor and the riparian corridor, to be protected and enhanced consistent with the POM 2030 and the Biodiversity Strategy.

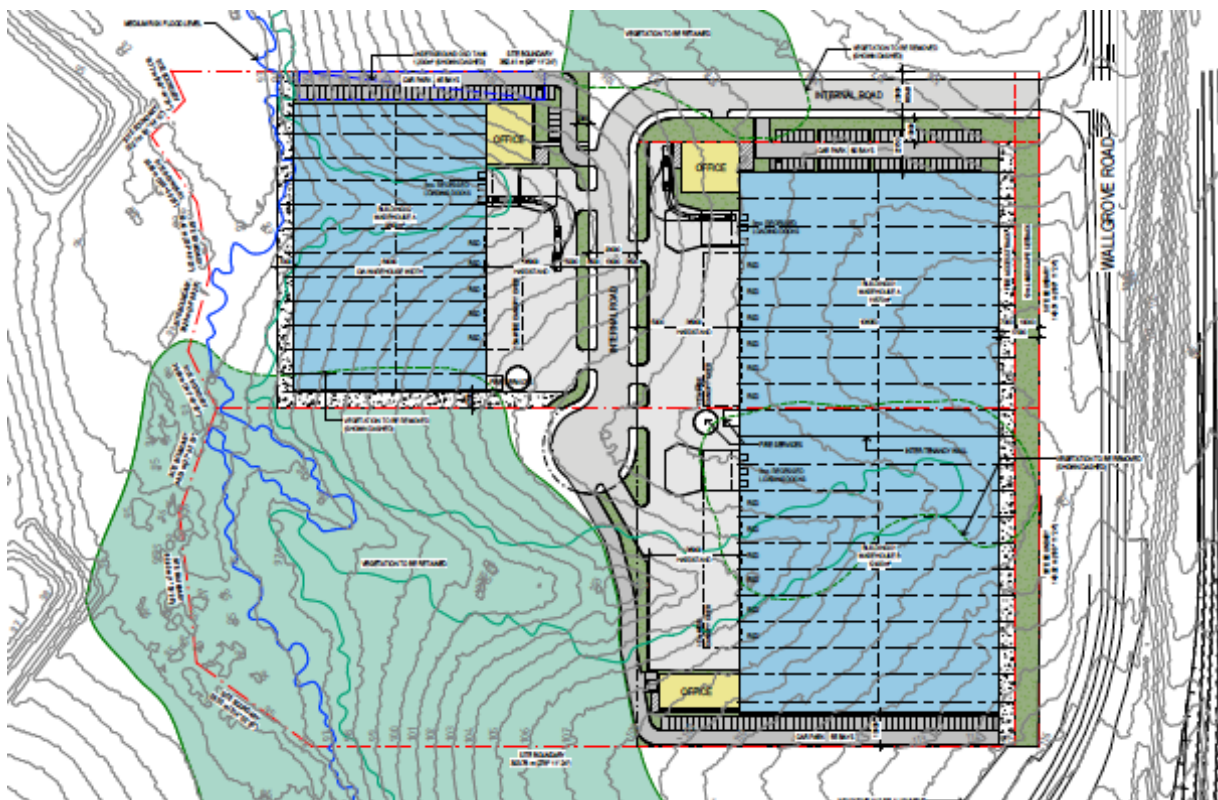


Figure 5: Plan of Proposal
(Source: Watson Young Architects)

3.2. Feasible Alternatives

Section 192(1)(c) of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) requires that an EIS must contain analysis of feasible alternatives to the carrying out of the development considering its objectives, including the consequences of not carrying out the development. A high-level analysis is provided below:

Table 3: Project alternatives

Option	Assessment
Do-Nothing	An option to leave the site in its current condition and ‘do nothing’ was considered and dismissed. This option is inconsistent with the project objectives to: – Provide an ongoing revenue stream for the WSPT to support the Parklands operations and maintenance and the development of new and existing facilities. – Deliver economic benefits and employment generation for Western Sydney and the Greater Sydney Region. The WSPT is a self-funded agency and the provisions of POM 2030 provide for the delivery of funding through the identified business hubs. The subject site was identified as a business hub through a comprehensive and careful selection process, considering its low environmental and recreational value and due to its isolation from the main Parklands corridor by the M7 Motorway and the re-alignment of Wallgrove Road as part of the M12 Motorway construction works. The site comprises only a very small part of the overall parklands area and the site and the collective 2% of land for business hubs will deliver an annual revenue stream for the WSPT to achieve financial sustainability and generate revenue to support the parklands operations. Further to the revenue stream, the business hubs are proposed to generate economic benefits and employment generation for Western Sydney. It has been estimated the proposed business and tourism hubs would generate approximately 8,800 local jobs and additional economic activity equating to approximately \$2.2 billion in 2031 within Western Sydney. The hubs would also reduce average commuter travel time by over 30 minutes per day, contributing to the efficiency and liveability of Western Sydney and the delivery of the ‘30 Minute City Concept’ outlined with the Region and District Plans. The ‘do nothing’ approach would represent a significant loss of potential income and have a major impact on the ongoing revenue available for the WSPT to undertake their operations in accordance with the POM 2030. It would also result in a significant impact on the potential economic benefits and employment- generating potential associated with the proposed development of the land as a business hub.
Alternative Design	A range of options were explored for the site access including consideration of alternatives to minimise impacts to native vegetation and to consider impacts of the Wallgrove Road realignment.
Alternative Location	The WSPT assessed the full Parklands corridor for potential sites to accommodate the proposed business hubs. The potential sites were identified in POM 2030 which was approved by the Minister in December 2018. This site was identified as a suitable location based on its isolation from the main Parklands corridor, low ecological value and its access to the road network.

4. Statutory Context

This section provides an overview of the key statutory requirements for the project, having regard to:

- the EP&A Act and EP&A Regulation
- other relevant legislation
- relevant environmental planning instruments
- relevant approvals.

Table 4: Statutory requirements

Option	Assessment
Power to grant consent	<i>Environmental Planning and Assessment Act 1979 (EP&A Act)</i> Section 4.36 of the EP&A Act provides for a process where development can be declared SSD either by a State environmental planning policy (SEPP) or Ministerial order published in the Government Gazette. Section 4.5 of the EP&A Act provides that the Minister of Planning and Public Spaces is the consent authority for SSD. Part 4, Division 4.7 of the EP&A Act sets out the provisions which apply to the assessment and determination of development applications for SSD. The proposal is subject to section 4.38 Consent of the EP&A Act. <i>State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP)</i> In accordance with section 2.6 and Schedule 2, clause 5 of the Planning Systems SEPP, development that has a CIV of more than \$10 million on land within the Western Sydney Parklands is classified as SSD. As the proposal has an estimated CIV of more than \$10 million and is located within the Western Sydney Parklands it is therefore classified as SSD. As the proposal is lodged by or on behalf of a public authority the Minister will be the consent authority.
Permissibility	<i>WPC Precincts SEPP, Western Sydney Parklands</i> The site is unzoned in accordance with section 7.8(2) of the WPC Precincts SEPP. Section 7.9(3) states that development not specified in clauses 7.9(1), 7.9(4) or 7.9(2) can be carried out with development consent. Each of the listed clauses is addressed as follows: ▪ Section 7.9(1) states that the following development may be carried out on land in the Western Parklands without consent, but only if it is carried out by or on behalf of a public authority: <i>amenity facilities; community facilities; depots; entertainment facilities; environmental facilities; environmental protection works; function centres; information and education facilities; kiosks; public administration buildings; recreation areas; recreation facilities (outdoor); restaurants or cafes; roads; signage (for directional, informative, or interpretative purposes); ticketing facilities.</i> The proposed industrial uses are not listed within this sub-section and accordingly cannot be carried out without consent.

Option	Assessment
Permissibility (cont.)	- Section 7.9(2) enables development for the purposes of extensive agriculture, other than farm buildings, to be carried out on public land in the Parklands without consent unless the land is in an environmental conservation area. The proposed uses do not include extensive agriculture and accordingly, section 7.9(2) does not apply to the proposed development. - Section 7.9(4) states that residential accommodation is prohibited in the Western Parklands. The proposal does not include residential accommodation and accordingly, section 7.9(4) does not apply. Sections 7.9(1), (2) or (4) do not apply to the proposal as outlined above. Accordingly, the proposed development is permitted with development consent in accordance with section 7.9(3) of the WPC Precincts SEPP.
Other approvals	
Consistent approvals	Roads Act 1993 Section 138 of the <i>Roads Act 1993</i> requires the consent of the relevant roads authority (the Council or Transport for NSW) for work in, on, under or over a public road. Any works proposed to a public road as part of the Project would require the consent of the relevant road authority. Given the proposed access road will need to connect to Wallgrove Road an approval is required under section 138 of the Roads Act 1993, and in accordance with s4.42 of the EP&A Act this cannot be refused.
EPBC Act Approval	The EPBC Act provides for the protection of the environment, especially matters of national environmental significance (MNES) and provides a streamlined national environmental assessment and approvals process. The bilateral agreement between the Commonwealth of Australia and the State of New South Wales relating to environmental assessment (the assessment bilateral agreement), allows the Commonwealth Minister for the Environment to rely on specified environmental impact assessment processes of the NSW in assessing actions under the EPBC Act. Matters of National Environmental Significance will be assessed as part of the SSDA process in accordance with the Agreement, with referral to the Commonwealth as necessary.
Other approvals	No other approvals are required for this concept development application and stage 1 works.

Option	Assessment
▪ Approvals required if the project was not an SSDA	<i>Rural Fires Act 1997</i> The site is included within Vegetation Category 3 and a bushfire assessment will be prepared to assess the potential bushfire hazards in accordance with <i>Planning for Bushfire Protection 2019</i>. Consistent with section 4.41 of the EP&A Act, SSD does not require an approval for a bushfire safety authority under Section 100B of the <i>Rural Fires Act 1997</i>.
	<i>National Parks and Wildlife Act 1974 (NPW Act)</i> The NPW Act aims to prevent the unnecessary or unwarranted destruction of relics and the active protection and conservation of relics of high cultural significance. The provisions of the Act apply to both indigenous and non-indigenous relics. Consistent with Section 4.41 of the EP&A Act, SSD is exempt from the need for a section 90 permit for the removal of items of Aboriginal heritage.
	<i>Heritage Act 1977</i> The Heritage Act 1977 is the principal Act for the management of NSW's environmental heritage. It establishes the State Heritage Register (SHR) and includes provisions for Interim Heritage Orders, Orders to Stop Work and archaeological relics (both on land and underwater). Consistent with section 4.41 of the EP&A Act, SSD does not require an approval under Part 4, or an excavation permit under section 139 of the <i>Heritage Act 1977</i>.
	<i>Water Management Act 2000</i> During the preparation of the EIS an assessment of potential impacts to surface or groundwater will be undertaken. Consistent with section 4.41 of the EP&A Act, SSD does not require an approval for water use (section 89), a water management work (section 90) or an activity (section 91) of the <i>Water Management Act 2000</i>.

Option	Assessment
Pre-conditions to granting consent	<i>Environmental Planning and Assessment Act 1979</i> Division 4.4 of the EP&A Act sets out the framework for concept development applications, which establish a concept proposal and for which subsequent detailed proposals are prepared and assessed in separate development applications. Section 4.24(2) of the EP&A Act states the determination of any further development application in respect of the site cannot be inconsistent with the Concept Approval. Considering the proposal is classified as a Concept DA pursuant to section 4.22 of the EP&A Act, any forthcoming approval will set the framework that any future detailed DAs will need to demonstrate consistency with. <i>WPC Precincts SEPP, Western Sydney Parklands</i> <i>Clause 7.13</i> of the WPC Precincts SEPP requires development consent must not be granted to any development that is at or below the flood planning level unless the consent authority is satisfied that the development: (a) is compatible with the flood hazard of the land, and (b) is not likely to significantly adversely affect flood behaviour resulting in detrimental increases in the potential flood affectation of other development or properties, and (c) incorporates appropriate measures to manage risk to life from flood, and (d) is not likely to significantly adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses, and (e) is not likely to result in unsustainable social and economic costs to the community as a consequence of flooding. <i>Clause 7.17</i> of the WPC Precincts SEPP requires development consent must not be granted to any development unless the consent authority is satisfied that any of the following services that are essential for the proposed development are available or that adequate arrangements have been made to make them available when required— (a) the supply of water, (b) the supply of electricity, (c) the disposal and management of sewage, (d) stormwater drainage or on-site conservation, (e) suitable road access.

Option	Assessment
	<i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> (s2.77) requires that the consent authority be satisfied that the potential safety risks or risks to the integrity of the pipeline have been identified, take those into consideration, give notice to the pipeline operator, and take into consideration any response from the pipeline operator. The EIS will be accompanied by an engineering report that will address these issues associated with the gas pipeline in the Wallgrove Road corridor. <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> (Resilience and Hazards SEPP) requires the consent authority to consider whether the subject land of any rezoning or development application is contaminated. If the land requires remediation to ensure that it is made suitable for a proposed use or zoning, the consent authority must be satisfied that the land can and will be remediated before the land is used for that purpose. The EIS will be accompanied by a Preliminary Site Investigation (PSI) to consider the nature, extent and degree of contamination at the site. The PSI will determine whether a Detailed Site Investigation (DSI) for the site is required, and further, whether a Remediation Action Plan (RAP) is needed to guide ongoing remediation works.
Mandatory matters for consideration	The relevant objects of the Act under section 1.3 must be considered. Section 4.15 of the EP&A Act outlines the matters that a consent authority must take into consideration when determining development applications. These matters are summarised as: ▪ provisions of environmental planning instruments (including draft instruments) ▪ planning agreements ▪ the EP&A Regulation ▪ the environmental, social and economic impacts of the development ▪ the suitability of the site ▪ any submissions ▪ the public interest, including the objects of the EP&A Act and the encouragement of ecologically sustainable development (ESD). These requirements will be addressed and detailed in the EIS.
	<i>Biodiversity Conservation Act 2016 (BC Act)</i> Clause 7.9 of the BC Act 2016 applies to SSD applications and requires SSD applications to be accompanied by a Biodiversity Development Assessment Report (BDAR) unless it is determined the proposal is not likely to have any significant impact on biodiversity values. Further investigations will be undertaken by an ecologist to provide a greater understanding of the biodiversity values on the site. Accordingly, a BDAR will be prepared, or a BDAR Waiver request will be prepared, as appropriate.

Option	Assessment
Mandatory matters for consideration (cont.)	WPC Precincts SEPP, Western Sydney Parklands Clause 7.10 of the WPC Precincts SEPP requires that the consent authority consider the following matters in determination of the application: (a) the aim of this Chapter, as set out in section 7.1, (b) the impact on drinking water catchments and associated infrastructure, (c) the impact on utility services and easements, (d) the impact of carrying out the development on environmental conservation areas and the natural environment, including endangered ecological communities, (e) the impact on the continuity of the Western Parklands as a corridor linking core habitat such as the endangered Cumberland Plain Woodland, (f) the impact on the Western Parkland's linked north-south circulation and access network and whether the development will enable access to all parts of the Western Parklands that are available for recreational use, (g) the impact on the physical and visual continuity of the Western Parklands as a scenic break in the urban fabric of western Sydney, (h) the impact on public access to the Western Parklands, (i) consistency with— (i) any plan of management for the parklands, that includes the Western Parklands, prepared and adopted under Part 4 of the Western Sydney Parklands Act 2006, or (ii) any precinct plan for a precinct of the parklands, that includes the Western Parklands, prepared and adopted under that Part, (j) the impact on surrounding residential amenity, (k) the impact on significant views, (l) the effect on drainage patterns, ground water, flood patterns and wetland viability, (m) the impact on heritage items, (n) the impact on traffic and parking. Clause 7.18 Earthworks of the WPC Precincts SEPP requires that the consent authority consider the following matters in determination of the application (a) the likely disruption of, or any detrimental effect on, drainage patterns and soil stability in the locality, (b) the effect of the proposed development on the likely future use or redevelopment of the land, (c) the quality of the fill or the soil to be excavated, or both, (d) the effect of the proposed development on the existing and likely amenity of adjoining properties,

Option	Assessment
Mandatory matters for consideration (cont.)	(e) the source of any fill material and the destination of any excavated material, (f) the likelihood of disturbing relics, (g) the proximity to and potential for adverse impacts on any watercourse, drinking water catchment or environmentally sensitive area, (h) any appropriate measures proposed to avoid, minimise or mitigate the impacts of the development. <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> The consent authority is to have regard to the following matters of consideration: Division 17 'Roads and Traffic', Subdivision 2 'Development in or adjacent to road corridors and road reservations'. The site is adjacent to Wallgrove Road. The consistency of the proposal with relevant provisions, in particular section 2.119 'development with frontage to classified road', will be detailed in the EIS. Where required, any mitigation measures will be detailed to ensure the proposed development does not compromise the effective and ongoing operation or function of these classified roads. The proposal would constitute traffic-generating development pursuant to section 2.122 of the SEPP. The application will be referred to Transport for NSW (TfNSW) for review as part of the assessment process. <i>Protection of the Environment Operations Act 1997</i> The <i>Protection of the Environment Operations Act 1997</i> (POEO Act) enforces licences and approvals formerly required under separate Acts relating to air, water and noise pollution, and waste management with a single integrated licence. Under Section 48 of the POEO Act, premise-based scheduled activities (as defined in Schedule 1 of the EP&A Act) require an Environment Protection Licence (EPL). Assessments carried out as part of the EIS for the proposal would determine the need for an EPL. The general provisions of the POEO Act in relation to the control of pollution of the environment will apply throughout the development. During construction, appropriate management measures would be implemented in relation to the control of noise, dust, erosion and sedimentation, and stormwater discharge, to ensure that the pollution control provisions of the POEO Act are satisfied. Further details of these management measures will be provided in the EIS.

Fairfield LEP 2013 and *State Environmental Planning Policy (Biodiversity and Conservation) 2021*, Chapter 6 do not apply to the site in accordance with the provisions of section 7.5(1) of the WPC Precincts SEPP. *State Environmental Planning Policy (Biodiversity and Conservation) 2021*, Chapter 2 does not apply as the land is unzoned.

Section 2.10 of the Planning Systems SEPP provides that development control plans do not apply to state significant development. Despite this, the provisions of Fairfield DCP will be considered as part of the impact assessment in the EIS.

5. Engagement

5.1. Engagement carried out

WSPT has consulted with a range of government stakeholders in preparing the scoping report including:

- NSW Department of Planning & Environment
- Transport for NSW in relation to 'M12 East' works including the construction of the M12 Motorway and construction works to Wallgrove Road, Elizabeth Drive and Cecil Road
- Transport for NSW in relation to the East-West Rail Link route
- Fairfield City Council.

5.2. Issues raised

The stakeholders raised a number of issues that will be addressed within the EIS, including:

- coordination with the M12 Motorway and associated roads upgrades, including proposed road access to the site and potential road widening
- the potential location for a train station associated with the East-West Rail Link, and the alignment of the Link, likely to be further north
- need to manage the interface with the nearby Cecil Park and Horsley Park urban investigation area and the proposed school, including considering acoustic impacts
- issues associated the protection of the Jemena pipeline, located in the Wallgrove Road corridor
- biodiversity impacts; and
- stormwater management.

5.3. Engagement to be carried out

A comprehensive programme of communication and engagement will occur during the preparation of the EIS with relevant stakeholders which will include the relevant State and Local authorities, service and utility providers and surrounding landowners.

The engagement process and the issues and comments raised during this process will be documented and addressed within the EIS.

The proponent intends to consult with the following parties:

- Department of Planning and Environment
- Transport for NSW
- Fairfield City Council
- utility and service authorities including Endeavour Energy, Sydney Water, Jemena and Telstra/NBN Co
- NSW Rural Fire Service and NSW Fire and Rescue
- Aboriginal community; and
- residents and landowners in proximity to the site including the Saints Peter and Paul Assyrian Primary School.

6. Proposed assessment of impacts

Based on this preliminary environmental assessment, the following are the key issues that will need to be considered as part of the EIS, and matters that do not require further assessment as part of this concept DA and Stage 1 DA.

6.1. Matters requiring further assessment

6.1.1. Access, traffic and parking

The environmental assessment will include a traffic and transport impact assessment of the proposed development taking into account:

- the proposed new Wallgrove Road alignment and the M7 and M12 Motorway connections, and any road widening proposed on Wallgrove Road
- assessment of traffic volumes generated from the proposal, including traffic associated with construction and operation
- assessment on proposed traffic generation and impacts on the existing road network, including impacts to existing intersections. This will include a cumulative assessment considering other proposed development in the locality
- detail on site access, internal loading, and manoeuvring in accordance with the relevant standards and controls
- the required car parking provision.

Mitigation and management measures to reduce the proposal's impact will also be identified where relevant.

6.1.2. Air

The air quality impacts caused by the construction of the proposal to surrounding sensitive receivers will be subject to assessment under the EIS. Mitigation and management measures to reduce the proposal's impact to adverse air quality will also be identified where relevant.

6.1.3. Amenity

The EIS will be accompanied by a Noise and Vibration Impact Assessment to assess the noise and vibration impacts associated with the construction and ongoing operation of the proposal, including with regards to traffic. Relevant noise mitigation and management measures to reduce noise and vibration will be detailed in the report.

Visual amenity impacts associated with the proposal will also be assessed in the EIS.

6.1.4. Biodiversity

Further investigations will be undertaken by an ecologist to provide a greater understanding of the biodiversity values on the site. Accordingly, a BDAR will be prepared, or a BDAR Waiver request will be prepared, as appropriate. An assessment of the development's impacts on any ecosystem associated with the existing farm dam due to dewatering will also be undertaken.

6.1.5. Built environment

The EIS will be supported by a concept architectural package which will set out the proposal for the site. The EIS will:

- outline the design rationale for positioning of buildings, internal road access and parking considering the site's constraints and opportunities
- include concept architectural and landscape plans to demonstrate the building positioning (setbacks) from each other, the roads and the boundaries of the site
- outline the cut and fill requirements for the site.

6.1.6. Economic

The EIS will consider the potential economic benefits of the proposal including employment generation, investment in local goods and services and financial sustainability of Western Sydney Parklands, and potential negative economic outcomes.

6.1.7. Hazards and risks

Bushfire

As the SSDA Site is within a designated bushfire prone area the vulnerability of the site to bushfires will be assessed as part of the EIS. This will include an assessment against the NSW Government's *Planning for Bush Fire Protection 2019*.

Contamination

The EIS will be accompanied by a Preliminary Site Investigation (PSI) to consider the nature, extent and degree of contamination at the site.

The PSI will determine whether a Detailed Site Investigation (DSI) for the site is required, and whether a Remediation Action Plan (RAP) or remediation is needed.

Flooding

The SSDA Site is located adjacent to a tributary of Ropes Creek and is subject to flooding from this creek and from local overland flow. As such, an assessment of flooding and impacts will be undertaken as part of the EIS.

6.1.8. Heritage

The EIS will be accompanied by an Aboriginal Cultural Heritage Assessment report which will assess the significance of the site from a cultural and Aboriginal heritage perspective and determine whether the proposal may affect the heritage significance of the site or locality. Consultation will be undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW).

6.1.9. Infrastructure and servicing

The EIS will assess the impact the proposal will have on existing utility services and service provider assets surrounding the site. The infrastructure requirements and augmentation needed (on and off

site) to support the development will be outlined and assessed. This includes with regards to water, sewerage, electricity, telecommunications infrastructure.

6.1.10. Social

As discussed above the EIS will be accompanied by a Noise and Vibration Impact Assessment, and visual impacts will be considered. A social impact assessment will also be prepared in accordance with the Department's *Social Impact Assessment Guideline*.

6.1.11. Waste

The EIS will detail all likely waste streams that will be generated during construction and outline proposed measures to dispose of the waste offsite in accordance with relevant legislation and guidelines. All construction and operational waste will be reused or recycled where possible.

6.1.12. Water

The EIS will be accompanied by an Integrated Water Management Strategy with details of stormwater/wastewater management system including how it will be designed, operated and maintained, including an onsite detention system, onsite sewage management and measures to treat, reuse or dispose of water.

7. Conclusion

The purpose of this report is to request project-specific SEARs for the preparation of an EIS to support the proposed Concept DA and Stage 1 proposal for a business hub at 97-151 Wallgrove Road, Cecil Park, within the Western Sydney Parklands and in the Fairfield City local government area.

This SEARs request outlines the approval pathway for the application, the legislative framework, and the key matters for consideration in the assessment of the application. The EIS will demonstrate how the proposal is suitable for the site and that potential environmental impacts can be appropriately mitigated, minimised, or managed to avoid any unacceptable impacts.

The proposal is consistent with planning for the Western Sydney Parklands and will provide an ongoing revenue stream for the Western Sydney Parklands Trust to support the Parklands operations and maintenance and the development of new and existing facilities.

Appendices

A. Scoping summary table

Level of assessment	Matter	CIA	Engagement	Relevant government plans, policies and guidelines	Scoping report reference
Detailed	Access, traffic and parking	Y	Specific	• <i>Guide to Traffic Management – Part 3 Traffic Studies and Analysis</i> (Austroads, 2013) • <i>Guide to Traffic Generating Developments</i> Version 2.2 (RTA, 2002)	Section 6.1.1
Standard	Air	N	General	• <i>The Approved Methods for the Modelling and Assessment of Air Pollutants in NSW</i> (EPA 2016)	Section 6.1.2
Detailed	Amenity – noise	Y	General	• <i>Interim Construction Noise Guideline</i> (Department of Environment, Climate Change and Water, 2009)	Section 6.1.3
Standard	Amenity – visual	N	General		Section 6.1.3
Detailed	Biodiversity	Y	General	• Consistent with the <i>Biodiversity Conservation Act 2016</i>	Section 6.1.4
Standard	Built Environment	N	General		Section 6.1.5
Standard	Hazards and risk – bushfire	N	General	• <i>Planning for Bushfire Protection 2019</i>	Section 6.1.7
Standard	Hazards and risk – contamination	N	General	• <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> • <i>Managing Land Contamination: Planning Guidelines SEPP 55 – Remediation of Land</i> (Department of Urban Affairs and Planning and Environment Protection Authority, 1998)	Section 6.1.7

Level of assessment	Matter	CIA	Engagement	Relevant government plans, policies and guidelines	Scoping report reference
Standard	Hazards and risk – flooding	Y	General	Rural Area Flood Study Ropes, Reedy & Eastern Creeks Final Report for Fairfield Council 2013 (BMT WBM)	Section 6.1.7
Detailed	Heritage	N	Specific	Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (DECCW)	Section 6.1.8
Detailed	Infrastructure and servicing	Y	Specific		Section 6.1.9
Standard	Social	N	General	Refer to scoping report	Section 6.1.10
Standard	Waste	N	General	- Waste Classification Guidelines (DECCW, 2009) - Waste Avoidance and Resource Recovery Act 2001	Section 6.1.11
Standard	Water	N	Specific		Section 6.1.12
Standard	Engagement	N	Specific	Undertaking Engagement Guidelines for State Significant Projects, Nov 2021	Section 5

B. Architectural plans

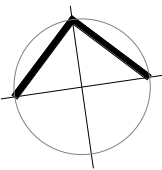


NO.	DATE:	REVISION:	BY:	CHK:
P1	27.01.2021	PRELIMINARY ISSUE FOR REVIEW	MC	IM

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Wallgrove_MP
Lots 24 & 25, Wallgrove Road, Cecil Park, NSW

LOCALITY PLAN



DATE: OCTOBER, 2022
DRAWN BY: MC
SCALE: 1 : 5000
SCALE: 1 : 10000@ A3

JOB NO:	20306
DRAWING NO:	MP02
REVISION:	P1





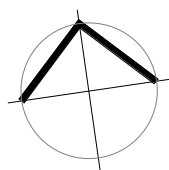
DEVELOPMENT ANALYSIS					
BUILDING NO.	SITE AREA (m²)	WAREHOUSE AREA (m²)	OFFICE AREA (m²)	TOTAL BUILDING (m²)	SITE COVERAGE (%)
BUILDING 01 - WH A	20,220	11,870	500	12,370	61.2
BUILDING 01 - WH B	23,665	12,400	500	12,900	54.5
BUILDING 02 - WH A	18,245	9,600	500	10,100	55.4
DEVELOPABLE LOT	62,130	33,870	1,500	35,370	
TOTAL LOT 24 & 25	98,696				
INTERNAL ROAD AREA		7,441m²			
CAR PARKING - BAYS					
BUILDING 01 - WH A		60			
BUILDING 01 - WH B		55			
BUILDING 02 - WH A		45			
DISCLAIMER: ALL TITLE BOUNDARIES ARE APPROXIMATE ONLY.					

NO:	DATE:	REVISION:	BY:	CHK:
P1	18.12.2020	PRELIMINARY ISSUE FOR REVIEW	JF	IM
P2	27.01.2021	PRELIMINARY ISSUE FOR REVIEW	MC	IM

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Wallgrove_MP
Lots 24 & 25, Wallgrove Road, Cecil Park, NSW

MASTERPLAN



Western Sydney
Parklands Trust



DATE: DECEMBER, 2020
DRAWN BY: IM
SCALE: As indicated
SCALE: 1:2000@A3

JOB NO:	20306
DRAWING NO:	MP01
REVISION:	P2



C. Capital Investment Value estimate



Construction Consultants

CAPITAL INVESTMENT VALUE REPORT

Proposed Warehouse Facilities Hub

Estate Earthworks, Roadworks and Infrastructures

Lots 24 & 25, Wallgrove Road, Cecil Park

Western Sydney Parklands Trust

4th November 2022

Northcroft (Australia) Pty Ltd
Suite 109, 40 Yeo St
Neutral Bay, Sydney
NSW 2089
Australia

Tel: +61 (02) 9909 0000
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Contact: sydney@northcroft.au
www.northcroft.com.au

1.0 Introduction

This Capital Investment Value cost assessment has been prepared from a review of costs associated with the proposal for a new industrial development at Lots 24 & 25 Wallgrove Road, Cecil Park, NSW for Western Sydney Parklands Trust.

The assessment is based on advice from the project consultant team on concept design, value management, management of construction works and co ordination for development of estate earthworks, roadworks and infrastructures.

Should any further information regarding this submission be required, please do not hesitate to contact:

David Yong

Director/Senior Quantity Surveyor

Northcroft (Australia) Pty Ltd
Suite 109, 40 Yeo St
Neutral Bay, Sydney
NSW 2089
Australia

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2.0 Capital Investment Value

Proposed Estate Earthworks, Roadworks and Infrastructures Lots 24 & 25, Wallgrove Road, Cecil Park

The lump sum amounts shall include all costs in carrying out the Project. The final sum is inclusive of the Goods and Services Tax (GST).

DESCRIPTION OF WORKS	Gross Floor Area	Lump Sum Value
1. Siteworks - Bulk Earthworks - Retaining Walls		\$ 2,060,000.00
2. Roadworks Site Entry and Internal Road		\$ 1,061,000.00
3. Authority Services - Stormwater and Detention Tanks - Electric Supply and Substation - Water Supply - Sewer Main - Gas Main - Telecommunication		\$ 6,774,000.00
4. Building Structures Separate Applications		Excluded
5. Builders Preliminaries, Overheads & Margin		\$ 1,188,000.00
Construction Cost:		\$ 11,083,000.00
6. Design Fees		\$ 330,000.00
Capital Investment Value (GST Excl):		\$11,413,000
GST:		\$1,141,300
CAPITAL INVESTMENT VALUE (GST Incl):		\$ 12,554,300

The information provided in this report is accurate at the date of preparation.

Signature

Date:	4 th November 2022
Signed for the Consultant by: (Authorised Officer)	 David Yong
In the Office Bearer capacity of:	Director/Senior Quantity Surveyor B.Build, AIQS (3513)

Appendix A

Cost Plan Details

Cost Plan Summary



Project: Western Sydney Parklands Trust

Details: S23077_DY_ESTIMATE_01.1

Building: Lots 24 & 25 Wallgrove Rd Cecil Park NSW

Cost Plan for DA

Code	Description	Quantity	Unit	Rate	SubTotal	Factor	Total
	BULK EARTHWORKS	98,696	m2	20.87	2,060,073		2,060,073
	ROADWORKS	98,696	m2	10.76	1,061,490		1,061,490
	INFRASTRUCTURE	98,696	m2	68.63	6,773,500		6,773,500
	CONTRACTORS PRELIMINARIES, OVERHEADS AND MARGIN	98,696	m2	12.04	1,187,937		1,187,937
	PROFESSIONAL FEES	98,696	m2	3.34	330,000		330,000
	TOTAL ESTIMATED COST EXCL GST	98,696	m2	115.64	11,413,000		11,413,000
	GST (10%)						1,141,300
	TOTAL ESTIMATED COST INCL GST						12,554,300

Cost Plan Details

Project: Western Sydney Parklands Trust

Details: S23077_DY_ESTIMATE_01.1

Building: Lots 24 & 25 Wallgrove Rd Cecil Park
NSW

Cost Plan for DA

Code	Trade Description	Quantity	Unit	Rate	Factor	Trade Total
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BULK EARTHWORKS

	SITE BENCHING:					
	Site establishment	1	item	50,000.00		50,000
	Potholing to locate existing services	1	item	10,000.00		10,000
	Site clearance	98,696	m2	0.70		69,087
	Site stripping	11,600	m3	12.00		139,200
	Respread topsoil from stockpile	4,935	m3	2.80		13,818
	Remove excess topsoil	6,665	m3	28.00		186,620
	Cut to fill operation	95,000	m3	6.00		570,000
	Bulk filling with imported material	11,600	m3	32.00		371,200
	Dust control	1	item	50,000.00		50,000
	Seeding	98,696	m2	0.50		49,348
	Temporary detention basins	1	item	450,000.00		450,000
	Retaining wall	112	m2	900.00		100,800

BULK EARTHWORKS

2,060,073

ROADWORKS

	ROADWORKS:					
	Site entry off Wallgrove Road	788	m2	530.00		417,640.00
	13.0m internal road	333	m	1,350.00		449,550.00
	1500 wide concrete footpath	670	m	180.00		120,600.00
	Landscaping and maintenance to road verge	670	m	110.00		73,700.00

ROADWORKS

1,061,490

INFRASTRUCTURE

	INFRASTRUCTURE:					
	Stormwater:					
	Stormwater drains	400	m	350.00		140,000
	Stormwater pit	20	no	5,000.00		100,000
	Stormwater detention tanks	2,900	m3	468.00		1,357,200
	Sewer:					
	Onsite sewerage treatment	1	item	400,000.00		400,000.00
	225 dia sewer reticulation	400	m	425.00		170,000
	Water:					
	Connection to main	1	item	80,000.00		80,000.00
	150 dia water reticulation	400	m	296.00		118,400
	Gas:					
	Connection to main	1	item	30,000.00		30,000
	Gas line reticulation	400	m	238.00		95,200
	Electrical:					

Cost Plan Details

Project: Western Sydney Parklands Trust	Details: S23077_DY_ESTIMATE_01.1
Building: Lots 24 & 25 Wallgrove Rd Cecil Park NSW	Cost Plan for DA

Code	Trade Description	Quantity	Unit	Rate	Factor	Trade Total
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INFRASTRUCTURE

(Continued)

	Substations	1	item	4,060,000.00		4,060,000
	Consumer main reticulation	400	m	430.00		172,000
	Street light	350	m	50.00		17,500
	Telecommunication:					
	Conduits	400	m	83.00		33,200

INFRASTRUCTURE

6,773,500

CONTRACTORS PRELIMINARIES, OVERHEADS AND MARGIN

	Contractors preliminaries, overheads and margin	1	item	1,187,937.00		1,187,937
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CONTRACTORS PRELIMINARIES, OVERHEADS AND MARGIN

1,187,937

PROFESSIONAL FEES

	Professional fees	11,000,000	item	0.03		330,000
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PROFESSIONAL FEES

330,000