

WILLOWTREE PLANNING



18 May 2023

REF: WTJ23 -142

NSW Department of Planning and Environment
Industry Assessments
Locked Bag 5022
Parramatta NSW 2124

Attention: Joanna Bakopanos

**RE: REQUEST FOR INDUSTRY-SPECIFIC SEARs
PROPOSED INDUSTRIAL ESTATE FOR WAREHOUSING AND DISTRIBUTION
PROPERTY AT 20 KELSO CRESCENT, MOOREBANK, NSW 2170**

Dear Joanna,

We write on behalf of Mapletree Investments Pte Ltd (the Proponent) to the NSW Department of Planning and Environment (DPE) in support of a request for industry-specific Secretary's Environmental Assessment Requirements (SEARs) under the Rapid Assessment Framework (RAF). The intent of this submission is to demonstrate that the proposal is eligible for industry-specific SEARs.

The proposal involves the construction of a multi-level warehouse and distribution centre at 20 Kelso Crescent, Moorebank, more formally described as Lot 2 in DP 521146 and Lot C in DP 327378 (the Site).

The Site is located within the Liverpool Local Government Area (LGA) and is zoned E4 General Industrial, pursuant to the *Liverpool Local Environmental Plan 2008* (LLEP 2008). The proposed development falls within the definition of a 'warehouse or distribution centre', which is permissible with consent in the E4 General Industrial zone of the LLEP 2008.

The proposed development seeks consent for a warehouse and distribution centre with a total Capital Investment Value (CIV) of approximately \$89,500,000.

The proposed development satisfies the definition of State Significant Development (SSD) pursuant to:

- Schedule 1, Clause 12 of the *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP), being development for the purpose of warehouses or distribution centres at one location and related to the same operation with a CIV of more than:
 - for development in relation to which the relevant environmental assessment requirements are notified under the Act on or before 31 May 2023 – \$30 million; or
 - for any other development – \$50 million.

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This letter provides an overview of the proposed development and the relevant planning framework that applies to enable the issuance of industry-specific SEARs, which will then guide the preparation of a formal Environmental Impact Statement (EIS) for the development of the Site.

The proposal is considered to meet the criteria for industry-specific SEARs, based on the following:

- It does not constitute Designated Development;
- It is wholly permissible pursuant to the LLEP 2008; and
- It does not involve a concept development application (DA).

The following sections provide an overview of the proposal to inform DPE's decision-making for the issuance of industry-specific SEARs.

1.0 SITE DESCRIPTION

The Site is identified as 20 Kelso Crescent, Moorebank, containing the following land holdings:

TABLE 1. SITE IDENTIFICATION		
Site Address	Legal Description(s)	Land Area (approx.)
20 Kelso Crescent	Lot 2 in DP 521146	1.55 hectares
	Lot C in DP 327378	1.97 hectares
Total Land Area		3.52 hectares

The Site comprises two (2) allotments located between Kelso Crescent to the north and Seton Road to the south. The Site is zoned E4 General Industrial pursuant to the LLEP 2008, which is intended to:

- *Provide a range of industrial, ~~and~~ warehouse, logistics and related land uses.*
- *Ensure the efficient and viable use of land for industrial uses.*
- *Encourage employment opportunities.*
- *Minimise any adverse effect of industry on other land uses.*
- *Enable limited non-industrial land uses that provide facilities ~~or~~ and services to meet the needs of businesses and workers in the area.*
- *Allow other land uses that are compatible with industry and that can buffer heavy industrial zones while not detracting from centres of activity.*

The existing attributes of the Site are noted as follows:

- The Site exhibits an area of 3.52 hectares and is located in the suburb of Moorebank.
- The Site exhibits a primary frontage of 87m to Kelso Crescent to the north, and a secondary frontage of 87m to Seton Road to the south.
- Vehicular access to the Site is currently facilitated by existing access points on Kelso Crescent and Seton Road.
- The current main occupier is 'Adbri Masonry', which operates the Site as a production plant. In its existing state, the Site comprises single-storey warehouse buildings at the front (north) of the Site, together with landscaping addressing the streetscape at Kelso Crescent. An additional warehouse building is located at the north-west portion of the Site, with a large construction aggregate processing structure at the rear (south) of the Site. These areas of warehousing are all linked by a network of internal circulation.
- The Site is otherwise interspersed with significant volumes of external storage, which include building materials, construction aggregates and palettes. Clusters of trees are present at the



centre of the Site and along the southern boundary addressing Seton Road. The Moorebank Zone Substation occupies what would otherwise constitute the north-west corner of the Site.

- The Site is located to the north of the Moorebank industrial area, which is bound by the A34 Newbridge Road to the north and the Anzac Creek to the east, with the Heathcote Road wrapping around to the west and south where it joins the M5 South-Western Motorway.
- The Site benefits from the aforementioned road connections to the A34 and M5 and the Sydney CBD is 26km to the east.
- The built form and character of the area is diverse and comprises large floor-plate warehousing and distribution centres alongside strata title multi-unit complexes and older factory style buildings. Lot sizes vary from 325m² through to 83 hectares.
- Main land use activities include freight, transport, warehousing and wholesale supplies owing to the accessibility of the nearby M5 and M7 Motorways and now the Intermodal Terminal, a new transport connection facility for freight containers transported from Port Botany via rail.

Refer to **Figure 1** and **Figure 2** below for illustrations of the Site and its context. **Figures 3, 4, 5** and **6** provide views of the Site from the north (Kelso Crescent to the front) and south (Seton Road to the rear).

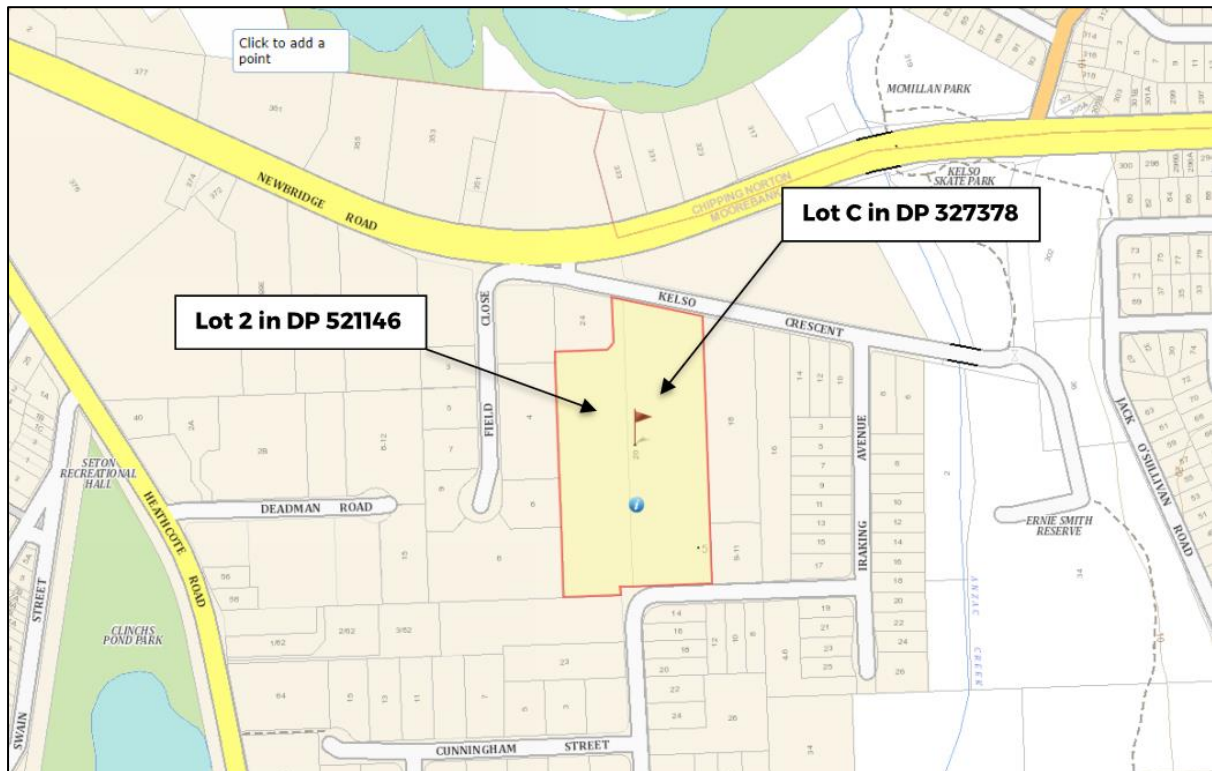


Figure 1. Cadastral Map (Source: Six Maps, 2023)





Figure 2. Aerial Map (Source: Near Map, 2023)





Figure 3. View of Front of Site from Kelso Crescent (Source: Google Maps, 2021)



Figure 4. View of Front of Site from Kelso Crescent (Source: Google Maps, 2021)



Figure 5. View of Rear of Site from Seton Road (Source: Google Maps, 2021)



Figure 6. View of Rear of Site from Seton Road (Source: Google Maps, 2021)



2.0 PROPONENT DETAILS

The Proponent for this proposal is Mapletree Investments, refer to **TABLE 2**:

TABLE 2. PROPONENT CONTACT DETAILS	
Company Details	Mapletree Investments Pte Ltd
Contact Name	Eng Khoon Tan
Position	Senior Manager, Projects, Group Development, Australia
Contact Number	0478 224 778
Email Address	tan.engkhoon@mapletree.com.sg

3.0 CAPITAL INVESTMENT VALUE

The CIV of the proposed development in accordance with the CIV definition under the *Environmental Planning & Assessment Regulation 2021* (EP&A Regulation) is estimated based on the scope of works outlined in **Section 4.0** below.

A preliminary Construction Cost Review has been prepared by the Proponent and is included at **Appendix 2**, which estimates a total CIV of \$89,500,000.

4.0 PROJECT DETAILS

The subject proposal will seek development consent for the construction and operation of a two-storey logistics facility, comprising five (5) warehouse and distribution centre buildings with mezzanine offices and car parking comprising 206 spaces. The current concept proposal plan, prepared by Nettletontribe, is enclosed at **Appendix 1**.

The particulars of this proposal are summarised as follows:

- Demolition of all existing buildings and structures
- Site preparation works, including tree clearing (No. of trees to be confirmed)
- Earthworks and additional site retaining
- Infrastructure comprising civil works and utilities servicing.
- Construction of five (5) warehouse buildings, split over two (2) storeys with ramp-up access, comprising:
 - Warehouse 1 at ground level – 5,700m²
 - Warehouse 2 at ground level – 5,920m²
 - Warehouse 3 at ground level – 5,780m²
 - Warehouse 4 at first floor – 11,600m²
 - Warehouse 5 at first floor – 5,780m²
- Multi-level car parking (126 spaces) off Kelso Crescent at the front of the Site, subterranean/undercroft car parking (80 spaces) off Seton Road at the rear of the Site, and a total of 32 loading docks across the two (2) storeys of warehousing.
- Complementary landscaping and offset planting comprising 2,810m², providing 8% coverage.
- Diversion of overhead electricity transmission lines at the western and southern boundaries to new subterranean channels.

The proposed development has been designed to provide future tenants with efficiencies, operational cost savings and flexibility in the layout. The design allows for a broad range of uses, including storage, warehouse and distribution, transport and wholesale supplies.

The proposed development includes those work identified in **TABLE 3** below:



TABLE 3. DEVELOPMENT PARTICULARS	
Site Area	3.52 hectares / 35,192m ²
Primary Land Use	Warehouse and Distribution Centre (logistics)
Ancillary Land Use	Offices
Gross Floor Area	34,420m ² 34,780m² GLA – Warehouse and Distribution Centre 1,900m² GLA – Ancillary Offices 900m² GLA – Ancillary Lobby Area
Floor Space Ratio	1:1
Number of Storeys	2 storeys plus subterranean/ undercroft car parking off Seton Road.
Landscaping	8% of the total site area, including 10m green primary setback and 5m green secondary setback.
Earthworks	The finished level for the Site is proposed to be RL 10.000 AHD (approximately +/- 1m), which requires cut and fill across the Site. Significant cut also required to enable the proposed subterranean/ undercroft car park off Seton Road at the rear of the Site – RL 7.000 (approximately +/- 1m).
Roads / Driveways	Three (3) vehicular crossovers, comprising: 1 x truck access and egress at the front of the Site at Kelso Crescent; 1 x car access and egress at the front of the Site at Kelso Crescent 1 x truck access at the front of the Site at Kelso Crescent; 1 x truck egress at the rear of the Site at Seton Road; and 1 x car access and egress at the rear of the Site at Seton Road.
Car Parking	206 spaces comprising: 80 spaces within subterranean/ undercroft car park accessed off Seton Road; and 126 spaces provided within multi-level car park accessed off Kelso Crescent.

5.0 STATUTORY CONTEXT

This section sets out the statutory planning framework and controls relevant to the proposal.

The following statutes, strategic plans and policies have been considered as part of the development of the planning phase:

Commonwealth Planning

- Commonwealth Environment Protection and Biodiversity Conservation Act 1999

State Planning Context

- Environmental Planning and Assessment Act 1979
- Environmental Planning and Assessment Regulation 2021
- Water Management Act 2000
- Biodiversity Conservation Act 2016
- Protection of the Environment Operations Act 1997



- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *State Environmental Planning Policy (Industry and Employment) 2021*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *State Environmental Planning Policy (Planning Systems) 2021*
- *Emerging State Environmental Planning Policy (Sustainable Buildings) October 2023*

Local Planning Context

- *Liverpool Local Environmental Plan 2008*
- *Liverpool Development Control Plan 2008*
- *Liverpool Local Strategic Planning Statement – Connected Liverpool 2040 (2020)*
- *Liverpool Contributions Plan 2018*

5.1 Environment Protection and Biodiversity Conservation Act 1999

Under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act), any action (which includes a development, project or activity) that is considered likely to have a significant impact on Matters of National Environmental Significance (MNES) (including nationally threatened ecological communities and species and listed migratory species) must be referred to the Commonwealth Minister for the Environment. The purpose of the referral is to allow a decision to be made about whether an action requires approval on a Commonwealth level. If an action is considered likely to have significant impact on MNES, it is declared a “controlled action” and formal Commonwealth approval is required.

The requirements of the EPBC Act will be considered as part of the forthcoming EIS.

5.2 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) is the overarching governing statute for all development in NSW and pursuant to Part 4, the proposal is considered SSD under the Planning Systems SEPP.

5.3.1 Section 4.15(1) of the EP&A Act 1979

Section 4.15(1) of the EP&A Act specifies the matters which a consent authority must consider when determining a DA. The forthcoming EIS will consider and address all matters outlined in Section 4.15 of the EP&A Act.

5.3 Environmental Planning and Assessment Regulation 2021

Section 7(1) of the EP&A Regulation states that:

“Development described in Schedule 3, Part 2 is declared to be designated development unless it is not designated development under Schedule 3, Part 3”.

The proposal, being a warehouse and distribution centre, does not trigger Designated Development pursuant to Schedule 3 of the EP&A Regulation.

5.4 Water Management Act 2000

The object of the *Water Management Act 2000* (WM Act) is the sustainable and integrated management of the State's water for the benefit of both present and future generations.

The Site is located approximately 200m west of Anzac Creek and approximately 170m south of Lake Moore, which is outside the thresholds of triggering the requirement for a controlled activity approval under the WM Act.



Notwithstanding, should groundwater interference be required as part of future development, further consideration of the WM Act will be required, and may necessitate a controlled activity approval under the WM Act.

5.5 Biodiversity Conservation Act 2016

The *Biodiversity Conservation Act 2016* (BC Act) and *Biodiversity Conservation Regulation 2017* (BC Regulation) seek to maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development.

Part 7 of the BC Act sets out the requirements for biodiversity assessments and approvals under EP&A Act.

Pursuant to Section 7.2(l) of the BC Act, development or an activity is likely to significantly affect threatened species if:

- (a) it is likely to significantly affect threatened species or ecological communities, or their habitats, according to the test in section 7.3, or*
- (b) the development exceeds the biodiversity offsets scheme threshold if the biodiversity offsets scheme applies to the impacts of the development on biodiversity values, or*
- (c) it is carried out in a declared area of outstanding biodiversity value.*

Pursuant to Section 7.9 of the BC Act, an SSD *“is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values”*.

The Proponent is still investigating whether they intend to seek a BDAR waiver. DPE will be kept informed on this matter.

5.6 Protection of the Environment Operations Act 1997

Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act) contains a core list of activities that require a licence before they may be undertaken or carried out. The definition of an ‘activity’ for the purposes of the POEO Act is:

“an industrial, agricultural or commercial activity or an activity of any other nature whatever (including the keeping of a substance or an animal)”.

The proposal does not constitute a Scheduled Activity under Schedule 1 of the POEO Act.

5.7 State Environmental Planning Policy (Resilience and Hazards) 2021

The *State Environmental Planning Policy (Resilience and Hazards) 2021* (Resilience and Hazards SEPP) contains planning provisions relating to:

- management of hazardous and offensive development; and
- remediation of contaminated land and to minimise the risk of harm.

In relation to the Site, the following matters are highlighted.



5.7.1 Hazardous and Offensive Development

The proposed warehouse and distribution facility may require the storage and/ or handling of some potentially dangerous goods or materials. As such, a preliminary risk screening analysis will be undertaken in accordance with the Industry-specific SEARs to determine whether a Preliminary Hazard Analysis is required.

5.7.2 Remediation of Contaminated Land

Under the provisions of Chapter 4 of the Resilience and Hazards SEPP, where a DA is made concerning land that is contaminated, the consent authority must not grant consent unless (as stipulated by Clause 4.6 of the SEPP):

- (a) it has considered whether the land is contaminated, and*
- (b) if the land is contaminated, it is 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, and*
- (c) if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.*

A detailed Site Investigation was completed by EI Australia in September 2022. It was concluded that widespread, or gross, contamination was not present at the Site. The Site was deemed to be suitable for on-going commercial and industrial use in accordance with the Resilience and Hazards SEPP (2021), although it is acknowledged that a Remediation Action Plan (RAP) will be necessary in the future to address the removal of all remaining underground and aboveground storage tanks, the septic tank, and the underground oil/ water separator. The RAP will also consider all hazardous materials present on the land.

5.8 State Environmental Planning Policy (Industry and Employment) 2021

The *State Environmental Planning Policy (Industry and Employment) 2021* (Industry and Employment SEPP) contains planning provisions relating to advertising and signage in NSW.

In relation to the Site, only the advertising and signage provisions would apply; requiring that consent authorities consider a series of criteria in relation to applications for signage and advertising. The criteria include character, special areas, views and vistas, streetscape, setting or landscape, site and building, illumination and safety. These criteria will apply to any future development for advertising and signage at the Site.

5.9 State Environmental Planning Policy (Transport and Infrastructure) 2021

The *State Environmental Planning Policy (Transport and Infrastructure) 2021* (Transport and Infrastructure SEPP) aims to facilitate the effective delivery of infrastructure across NSW.

5.9.1 Development likely to affect an electricity transmission or distribution network

The western and southern boundaries contain overhead electricity transmission lines, which are proposed to be diverted through subterranean channels. The corresponding easements are 9.15m wide at the western boundary and 13.72m wide at the southern boundary. As such, consideration will be given to Section 2.48 of the Transport and Infrastructure SEPP.



5.9.2 Traffic generating development

Schedule 3 of the Transport and Infrastructure SEPP lists the types of development that are defined as Traffic Generating Development. The referral thresholds for 'warehouse or distribution centres' development includes sites of:

- 8,000m² in site area or (if the site area is less than the gross floor area) gross floor area;

The proposal is considered Traffic Generating Development and will be referred to TfNSW for concurrence. The forthcoming EIS will be supported by a robust transport and traffic impact assessment.

5.10 State Environmental Planning Policy (Planning Systems) 2021

Schedule 1 of the Planning Systems SEPP includes provisions for developments to be undertaken as SSD. Section 12 is relevant to the proposed development:

- (1) *Development that has a capital investment value of more than the relevant amount for the purpose of warehouses or distribution centres (including container storage facilities) at one location and related to the same operation.*
- (2) *This section does not apply to development for the purposes of warehouses or distribution centres to which section 18 or 19 applies.*
- (3) *In this section—*
relevant amount means—
 - (a) *for development in relation to which the relevant environmental assessment requirements are notified under the Act on or before 31 May 2023—\$30 million, or*
 - (b) *for any other development—\$50 million.*

The CIV of the proposed development is currently estimated between \$80 - \$90 million (see **Appendix 2**), thus the SSD provisions apply.

5.11 Emerging State Environmental Planning Policy (Sustainable Buildings) October 2023

The new *State Environmental Planning Policy (Sustainable Buildings) 2022* encourages the design and delivery of more sustainable buildings across NSW. It sets sustainability standards for residential and non-residential development and starts the process of measuring and reporting on the embodied emissions of construction materials.

The purpose of this new SEPP is to:

- minimise the consumption of energy and potable water
- reduce greenhouse gas emissions from energy use
- monitor the embodied emissions of building materials
- deliver buildings that are comfortable in summer and winter.

Pursuant to Clause 3.2(1) of the new SEPP, which refers to 'Development consent for non-residential development', in deciding whether to grant development consent to non-residential development, the consent authority must consider whether the development is designed to enable the following –

- (a) the minimisation of waste from associated demolition and construction, including by the choice of building materials,



- (b) a reduction in peak demand for electricity, including through the use of energy efficient technology,
- (c) a reduction in the reliance on artificial lighting and mechanical heating and cooling through passive design,
- (d) the generation and storage of renewable energy,
- (e) the metering and monitoring of energy consumption,
- (f) the minimisation of the consumption of potable water.

Clause 3.2(2) advises that development consent must not be granted to non-residential development unless the consent authority is satisfied the embodied emissions attributable to the development have been quantified.

The Sustainable Buildings SEPP and Regulation amendments will commence on 1 October 2023 to give the industry and assessors time to prepare.

5.12 Liverpool Local Environmental Plan 2008

The Site is located within the E4 General Industrial zone under the LLEP 2008 as shown in **Figure 3**.

5.12.1 Zoning

The Site is zoned E4 General Industrial under the provisions of the LLEP 2008.

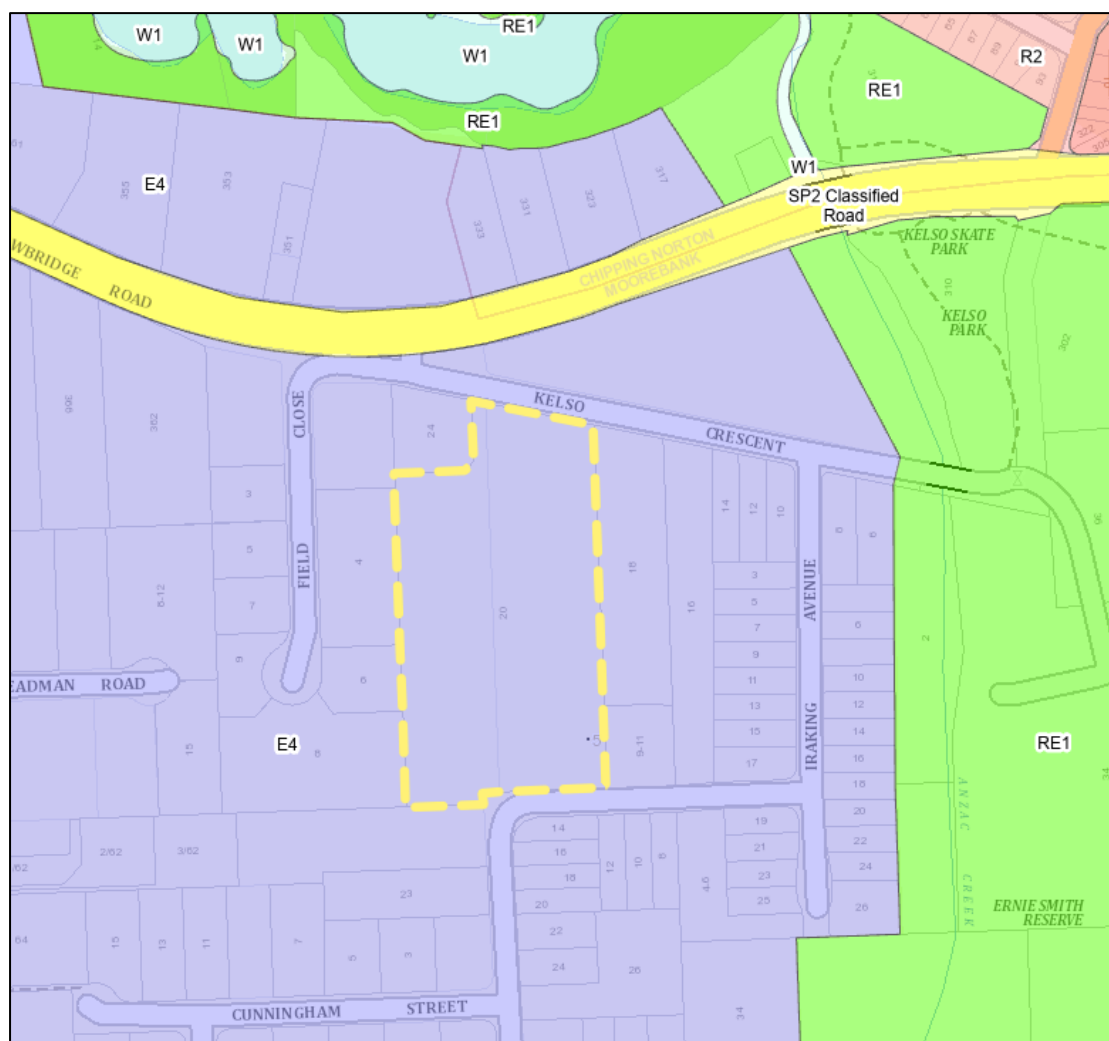


Figure 3. LLEP 2008 Land Uses (Source: NSW Legislation, 2023)

5.12.2 Land Use

Under the LLEP 2008, the proposal would be considered a 'Warehouse or distribution centre', which are defined 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.

5.12.3 Permissibility

The objectives and permissible land uses of the E4 General Industrial zone, and the corresponding changes as a consequence of the new E4 General Industrial zone are set out below.

TABLE 4. ZONE OBJECTIVES AND PERMITTED LAND USE	
Requirement	Application to the Site
E4 General Industrial	
1. Zone Objectives	- To provide a range of industrial, warehouse, logistics and related land uses. - To ensure the efficient and viable use of land for industrial uses. - To encourage employment opportunities. - To minimise any adverse effect of industry on other land uses. - To enable limited non-industrial land uses that provide facilities or and services to meet the day-to-day needs of businesses and workers in the area. - To allow other land uses that are compatible with industry and that can buffer heavy industrial zones while not detracting from centres of activity.
2. Permitted without Consent	Nil
3. Permitted with Consent	Animal boarding or training establishments; Boat building and repair facilities; Boat sheds; Building identification signs; Business identification signs; Car parks; Community facilities; Crematoria; Depots; Emergency services facilities; Environmental facilities; Environmental protection works; Flood mitigation works; Freight transport facilities; Garden centres; General industries; Goods repair and reuse premises; Hardware and building supplies; Helipads; Heliports; Industrial training facilities; Industrial retail outlets; Kiosks; Light industries; Local distribution premises; Mortuaries; Neighbourhood shops; Oyster aquaculture; Passenger transport facilities; Places of public worship; Public administration buildings; Recreation areas; Recreation facilities (indoor); Recreation facilities (outdoor); Restaurants or cafes; Roads; Service stations; Sex services premises; Storage premises; Take away food and drink premises; Tank-based aquaculture; Timber yards; Transport depots; Vehicle body repair workshops; Vehicle repair stations; Vehicle sales or hire premises; Veterinary hospitals; Warehouse or distribution centres
4. Prohibited	Any other development not specified in item 2 or 3



The proposed development, being for a warehouse and distribution centre, is permitted with consent in the E4 General Industrial zone.

6.0 OTHER APPROVALS/ COMMENTS

No other approvals are sought for this proposal.

7.0 INDUSTRY-SPECIFIC SEARS

This section reviews the relevant industry-specific SEARs and includes commentary on how the Proponent intends to respond to each item, where applicable.

TABLE 5. INDUSTRY-SPECIFIC SEARs		
Issue and Assessment Requirements	Documentation	Proponent Comments
1. Statutory Context - Address all relevant legislation, environmental planning instruments (EPIs) (including drafts), plans, policies and guidelines. - Identify compliance with applicable development standards and provide a detailed justification for any non-compliances. - If the development is only partly State significant development (SSD) declared under Chapter 2 of SEPP (Planning Systems) 2021, provide an explanation of how the remainder of the development is sufficiently related to the component that is SSD. - Address the requirements of any approvals applying to the site, including any concept approval or recommendation from any Gateway determination.	Address in EIS	Noted – the proposal will address the requirement of this item.
2. Capital Investment Value and Employment Provide a detailed calculation of the capital investment value (CIV) of the development prepared by a AIQS Certified Quantity Surveyor or RICS Chartered Quantity Surveyor in accordance with <i>Planning Circular PS 21-020: Calculation of Capital Investment Value</i>. The calculation of the estimated CIV is to be accurate at the date of application and include details of all components and assumptions from which it is derived.	Quantity Surveyor Report	Noted – a Quantity Surveyor Report will support the proposal.



Provide an estimate of the retained and new jobs that would be created during the construction and operational phases of the development, including details of the methodology to determine the figures provided.		
3. Design Quality - Demonstrate how the development will achieve: - design excellence in accordance with any applicable EPI provisions. - good design in accordance with the seven objectives for good design in Better Placed. - Where required by an EPI or concept approval, demonstrate that the development has been subject to a competitive design process, or reviewed by the State Design Review Panel (SDRP) consistent with the <i>NSW SDRP: Guidelines for Project Teams</i>. Recommendations are to be addressed prior to lodgement.	Address in EIS If required: - Design Review Report (where the project has been reviewed by the SDRP) - Design Excellence Strategy (where design excellence is required by an EPI) - Competition Report (where a competitive design process has been held)	Design quality will be addressed in the EIS, however, it is noted that a Design Review Summary, Design Excellence Strategy and Competition Report are not required for a proposal of this nature.
4. Built Form and Urban Design - Explain and illustrate the proposed built form, including a detailed site and context analysis to justify the proposed site planning and design approach. - Demonstrate how the proposed built form (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses and responds to the context, site characteristics, streetscape and existing and future character of the locality. - Demonstrate how the building design will deliver a high-quality development, including consideration of façade design, articulation, materials, finishes, colours, any signage and integration of services. - Assess how the development complies with the relevant accessibility requirements.	- Architectural drawings - Design Report - Survey Plan - Building Code of Australia Compliance Report - Accessibility Report	Noted – the proposal will address the requirements of this item through the listed reports.



5. Visual Impact ▪ Provide a visual analysis of the development from key viewpoints, including photomontages or perspectives showing the proposed and likely future development. ▪ Where the visual analysis has identified potential for significant visual impact, provide a visual impact assessment that addresses the impacts of the development on the existing catchment.	▪ Visual Analysis ▪ Visual Impact Assessment	Noted - the proposal will be informed by photomontages and perspective drawings, where necessary, and include a Visual Impact Assessment.
6. Traffic, Transport and Accessibility ▪ Provide a transport and accessibility impact assessment, which includes: ○ details of all traffic types and volumes likely to be generated during construction and operation, including a description of key access and haul routes. ○ an assessment of the predicted impacts of this traffic on road safety and the capacity of the road network, including consideration of cumulative traffic impacts on existing performance levels of nearby intersections (using industry standard modelling). ○ plans demonstrating how all vehicles likely to be generated during construction and operation and awaiting loading, unloading or servicing can be accommodated on the site to avoid queuing in the street network. ○ details and plans of any proposed internal road network, loading dock provision and servicing, on-site parking provisions, and sufficient pedestrian and cyclist facilities, in accordance with the relevant Australian Standards.	▪ Transport and Accessibility Impact Assessment ▪ Construction Traffic Management Plan ▪ Green Travel Plan or equivalent	Noted - the proposal will address the requirements of this item through the listed reports.



○ swept path analysis for the largest vehicle requiring access to the development. ○ details of road upgrades, infrastructure works, or new roads or access points required for the development if necessary. ▪ Provide a Construction Traffic Management Plan detailing predicted construction vehicle, routes, access and parking arrangements, coordination with other construction occurring in the area, and how impacts on existing traffic, pedestrian and bicycle networks would be managed and mitigated.		
7. Trees and Landscaping ▪ Provide a detailed site-wide landscape plan, that: ○ Identifies the number and location of trees to be removed and retained, and how opportunities to retain significant trees have been explored and/or informs the plan. ○ Details the proposed site planting, including location, number and species of plantings, heights of trees at maturity and proposed canopy coverage (as a percentage of the site are). ○ Demonstrates how the proposed development would: ▪ Contribute to long-term landscape setting in respect of the site and streetscape ▪ Mitigate the urban heat island effect and ensure appropriate comfort levels on-site.	▪ Landscape Plan	Noted - the proposal will include a Landscape Plan that addresses each of the requirements.



▪ Contribute to the objective of increased urban tree canopy cover. ▪ Maximise opportunities for green infrastructure, consistent with <i>Greener Places</i> and having regard to any bush fire risk.		
8. Ecologically Sustainable Development (ESD) ▪ Identify how ESD principles (as defined in section 193 of the EP&A Regulation) are incorporated in the design and ongoing operation of the development. ▪ Demonstrate how the development will meet or exceed the relevant industry recognised building sustainability and environmental performance standards. ▪ Demonstrate how the development minimises greenhouse gas emissions (reflecting the Government's goal of net zero emissions by 2050) and consumption of energy, water (including water sensitive urban design) and material resources.	▪ ESD Report	Noted – the proposal will be supported by an ESD Report.
9. Biodiversity ▪ Assess any biodiversity impacts associated with the development in accordance with the <i>Biodiversity Conservation Act 2016</i> and the <i>Biodiversity Assessment Method 2020</i>, including the preparation of a Biodiversity Development Assessment Report (BDAR), unless a waiver is granted, or the site is on biodiversity certified land. ▪ If the development is on biodiversity certified land, provide information to identify the site (using associated mapping) and demonstrate the proposed development is consistent with the relevant biodiversity measure conferred by the biodiversity certification.	▪ Biodiversity Development Assessment Report or BDAR Waiver	Owing to limited existing green coverage at the Site, the proposal will be supported by a BDAR Waiver.



10. Air Quality Identify significant air emission sources at the proposed development (during construction and operation), assess their potential to cause adverse off-site impacts, and detail proposed management and mitigation measures that would be implemented. Where air emissions during operation have the potential to cause adverse off-site impacts, provide a quantitative air quality impact assessment prepared in accordance with the relevant NSW Environment Protection Authority (EPA) guidelines.	- Address in EIS If required: - Air Quality Impact Assessment	The proposal will be supported by an Air Quality Impact Assessment.
11. Noise and Vibration Provide a noise and vibration assessment prepared in accordance with the relevant EPA guidelines. The assessment must detail construction and operational noise and vibration impacts on nearby sensitive receivers and structures and outline the proposed management and mitigation measures that would be implemented.	Noise and Vibration Impact Assessment	Noted - the proposal will be supported by a Noise and Vibration Impact Assessment.
12. Ground and Water Conditions - Assess potential impacts on soil resources and related infrastructure and riparian lands on and near the site, including soil erosion, salinity and acid sulfate soils. - Provide a Surface and Groundwater Impact Assessment that assesses potential impacts on: - surface water resources (quality and quantity) including related infrastructure, hydrology, dependent ecosystems, drainage lines, downstream assets and watercourses. - groundwater resources in accordance with the <i>Groundwater Guidelines</i>.	Salinity Management Plan and/or Acid Sulfate Soils Management Plan	Noted - the proposal will address the requirements of this item through the listed reports.
13. Stormwater and Wastewater	Integrated Water Management Plan	Noted - the proposal will be supported by an



▪ Provide an Integrated Water Management Plan for the development that: ○ is prepared in consultation with the local council and any other relevant drainage or water authority. ○ outlines the water-related servicing infrastructure required by the development (informed by the anticipated annual and ultimate increase in servicing demand) and evaluates opportunities to reduce water demand (such as recycled water provision). ○ details the proposed drainage design (stormwater and wastewater) for the site including any on-site detention facilities, water quality management measures and nominated discharge points, on-site sewage management, and measures to treat, reuse or dispose of water. ○ demonstrates compliance with the local council or other drainage or water authority requirements and avoids adverse downstream impacts. ▪ Where water and drainage infrastructure works are required that would be handed over to the local council, or other drainage or water authority, provide full hydraulic details and detailed plans and specification of proposed works that have been prepared in consultation with, and comply with the relevant standards of, the local council or other drainage or water authority.		Integrated Water Management Plan.
14. Flooding Risk ▪ Identify any flood risk on-site having regard to adopted flood studies, the potential effects of climate change, and any relevant provisions of the NSW Floodplain Development Manual.	Flood Risk Assessment	Noted – the proposal will be supported by a Flood Risk Assessment.



Assess the impacts of the development, including any changes to flood risk on-site or off-site, and detail design solutions and operational procedures to mitigate flood risk where required		
15. Hazards and Risk - Where there are dangerous goods and hazardous materials associated with the development provide a preliminary risk screening in accordance with Chapter 3 of SEPP (Resilience and Hazards) 2021. - Where required by SEPP (Resilience and Hazards) 2021, provide a Preliminary Hazard Analysis prepared in accordance with <i>Hazardous Industry Planning Advisory Paper No.6 – Guidelines for Hazard Analysis and Multi-Level Risk Assessment</i>. - If the development is adjacent to or on land in a pipeline corridor, report on consultation outcomes with the operator of the pipeline, and prepare a hazard analysis.	- Preliminary Hazard Analysis If required: - Hazard Analysis (pipeline)	Noted – no dangerous goods or activities are proposed. This will be addressed in the EIS, with an appropriately worded condition of consent addressing dangerous goods at the Site.
16. Contamination and Remediation In accordance with Chapter 4 of SEPP (Resilience and Hazards) 2021, assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable (or will be suitable, after remediation) for the development.	- Preliminary Site Investigation If required: - Detailed Site Investigation - Remedial Action Plan - Preliminary Long-term Environmental Management Plan.	Noted – the proposal will be supported by a Detailed Site Investigation and a Remedial Action Plan (RAP).
17. Waste Management - Identify, quantify, and classify the likely waste streams to be generated during the construction and operation. - Provide the measures to be implemented to manage, reuse, recycle and safely dispose of this waste. - Identify appropriate servicing arrangements for the site.	- Waste Management Plan - Hazardous Material Survey	Noted – the proposal will be supported by a Waste Management Plan and Hazardous Material Survey.



If buildings are proposed to be demolished or altered, provide a hazardous materials survey.		
18. Aboriginal Cultural Heritage Provide an Aboriginal Cultural Heritage Assessment Report prepared in accordance with relevant guidelines, identifying, describing and assessing any impacts on any Aboriginal cultural heritage values on the land.	Aboriginal Cultural Heritage Assessment Report	Noted - the proposal will be supported by an Aboriginal Cultural Heritage Assessment Report.
19. Environmental Heritage Where there is potential for direct or indirect impacts on the heritage significance of environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (if potential impacts to archaeological resources are identified), prepared in accordance with the relevant guidelines, which assesses any impacts and outlines measures to ensure they are minimised and mitigated.	- Statement of Heritage Impact - Archaeological Assessment	Noted - the proposal will be supported by a Statement of Heritage Impact.
20. Social Impact Provide a Social Impact Assessment prepared in accordance with the <i>Social Impact Assessment Guidelines for State Significant Projects</i>.	Social Impact Assessment	Noted - the proposal will be supported by a Social Impact Assessment.
21. Infrastructure Requirements and Utilities - In consultation with relevant service providers: - assess the impacts of the development on existing utility infrastructure and service provider assets surrounding the site. - identify any infrastructure required on-site and off-site to facilitate the development and any arrangements to ensure that the upgrades will be implemented on time and be maintained. - provide an infrastructure delivery and staging plan, including a description of	Infrastructure Delivery, Management and Staging Plan	Noted - the proposal will be supported by an Infrastructure Delivery, Management and Staging Plan.



how infrastructure requirements would be co-ordinated, funded and delivered to facilitate the development.		
22. Bush Fire Risk If the development is on bush fire prone land, or a bush fire threat is identified on or adjoining the site, provide a bush fire assessment that details proposed bush fire protection measures and demonstrates compliance with <i>Planning for Bush Fire Protection</i>.	Bush Fire Assessment	Not applicable – the Site is not bush fire prone land.
23. Construction, Operation and Staging If staging is proposed, provide details of how construction and operation would be managed and any impacts mitigated.	Address in EIS	Noted – the proposal will address this requirement.
24. Contributions and Public Benefit - Address the requirements of any relevant contribution plan(s), planning agreement or EPI requiring a monetary contribution, dedication of land and/or works-in-kind and include details of any proposal for further material public benefit. - Where the development proposes alternative public benefits or a departure from an existing contributions framework, the local council, the Department and relevant State agencies are to be consulted prior to lodgement and details, including how comments have been addressed, are to be provided.	Address in EIS	Noted – the proposal will address the requirement of this item.
25. Engagement - Detail engagement undertaken and demonstrate how it was consistent with the <i>Undertaking Engagement Guidelines for State Significant Projects</i>. Detail how issues raised and feedback provided have been considered and responded to in the project. In particular, applicants must consult with: - the relevant Department assessment team. - any relevant local councils.	Engagement Report	Noted – the proposal will be supported by an Engagement Report, in accordance with the Undertaking Engagement Guidelines for State Significant Projects.



○ any relevant agencies (including the Western Parkland City Authority for development within the Western Parkland City). ○ the community. ○ if the development would have required an approval or authorisation under another Act but for the application of s 4.41 of the EP&A Act or requires an approval or authorisation under another Act to be applied consistently by s 4.42 of the EP&A Act, the agency relevant to that approval or authorisation.		
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The proposed development is considered to meet the eligibility criteria for industry-specific SEARs. As such, it is requested that DPE issue formal SEARs for the preparation of an EIS for this proposal as SSD.

Should you require any further information, please do not hesitate to contact Jamie Bryant on 0407 227 431 or via email at jbryant@willowtp.com.au.

Your sincerely,



Andrew Cowan
Director
Willowtree Planning Pty Ltd

Enc

- Appendix 1** Preliminary Concept Drawings
- Appendix 2** Preliminary Construction Cost Summary