URBIS

AMENDMENT REPORT

MULTI-LEVEL WAREHOUSE, 1-3 BURROWS ROAD ST PETERS

(SSD-35962232)

Prepared for Goodman Property Services (Australia) Pty Ltd
December 2024

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

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Project Code	P34479
Report Number	V5 – Lodgement

Acknowledgement of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on.

We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years.

We pay our respects to First Nations Elders, past and present.

The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

Title: Sacred River Dreaming
Artist Hayley Pigram
Darug Nation
Sydney, NSW

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1. INTRODUCTION

This Amended Development Report (**ADR**) has been prepared on behalf of Goodman Property Services (Australia) Pty Ltd (Goodman) (the Applicant) in support of a State Significant Development Application (**SSDA**) for a proposed multi-storey warehouse and distribution centre at 1-3 Burrows Road, St Peters (**the site**).

The proposed development is classified as State Significant Development (**SSD**) given the proposed development is for the purposes of a multi-level industrial warehouse and distribution facility and the Estimated Development Cost (**EDC**) is greater than $30 million (and SEARs were issued prior to 1 June 2023).

Since lodgement of the application, market testing has been undertaken which confirmed the three-level scheme would not be viable to construct or operate. Therefore, Goodman seeks to amend the application to propose an alternative two-level scheme. This Amended Development Report has been prepared in accordance with section 37 of the *Environmental Planning & Assessment Regulation 2021* (**EP&A Regulation**) to comprehensively outline the proposed changes and provide a consolidated assessment of the amended scheme for consideration by the NSW Department of Planning, Housing and Infrastructure (**DPHI**).

This report includes assessment of compliance with the statutory and strategic planning framework, and all other potential environmental impacts identified through the preparation of this amended SSDA. Further, this report has been prepared in accordance with *State Significant Development Guidelines – Preparing an Amendment Report* (October 2022). This ADR also provides an assessment of the proposal against the relevant considerations under Section 4.15 of the Environmental Planning and Assessment Act (**EP&A Act**).

This ADR should be read in conjunction with all supporting documentation appended to this report.

1.1. APPLICANT DETAILS

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

Table 1 Applicant Details

Descriptor	Applicant Details
Full Name(s)	Goodman Property Services (Aust) Pty Ltd
Postal Address	1-11 Hayes Road, Roseberry NSW 2018
ABN	40 088 981 793
Nominated Contact	Rory Pryor – Development Manager (Goodman) E: Rory.Pryor@goodman.com P: 0408 618 928

1.2. PROJECT OVERVIEW

This ADR is submitted to the Department of Planning, Housing and Infrastructure (DPHI) on behalf of Goodman in support of SSD-35962232.

The original Competition Winning SSDA sought consent for a multi-storey warehouse and distribution centre at 1-3 Burrows Road, St Peters. The proposed design has been amended in response to issues relating to site contamination, potential flood impacts, assessment of the local logistics market and construction cost escalation. To ensure that the scheme, as amended retains the established design excellence elements from the competition, the Design Integrity Panel was reconvened to review the amended scheme. The DIP reconvened on 26 February 2024 to consider whether the revised two-storey scheme was substantially the same with the concept design competition winning scheme originally prepared by Welsh and Major. Following the session, the DIP determined:

- The refined concept addresses and retains the majority of the key design elements / concepts of the original (competition winning) scheme; and
- Is well on track to demonstrate that it is 'substantially the same' to the winning scheme from the design competition.

Following another session held on 5 August 2024, the DIP confirmed:

- The level of design resolution appropriately responded to the DIP outstanding matters.
- The design as presented retains design integrity with the competition winning scheme; and
- Is appropriate to support an amended DA.

Based on the DIP's feedback the proposal satisfies the requirement for the amended development to be 'substantially the same', from a design integrity perspective, as the design competition winning scheme.

The revised scheme was then presented to the DPHI assessments team on the 2 September 2024 to formally request to amend SSD-35962232 in accordance with Section 37 of the *Environmental Planning and Assessment Regulation 2021*. This formal letter request was sent on 9 October 2024 and is appended to this Amendment Report.

The intent of the proposal remains the same, however there have been changes to the physical layout and built form of the warehouse and distribution facility as outlined below:

- Reduction of the proposed warehouse from 3 storeys (30.14m) to 2 storeys (25m). Despite the reduction of 1 storey, the building height has only been reduced by approximately 5m. The remaining 2 storeys have increased in height to provide a more efficient warehouse facility.
- Re-orientation of the layout from an east-west central hardstand with smaller warehouse tenancies on the north and south, to a north-south central hardstand with larger/deeper warehouse tenancies on the east and west. This provides for more efficient warehouse layouts and truck access.
- Previously, truck access to the warehouse tenancies was facilitated via north and south spiral ramps from Burrows Road, connecting to a north-south hardstand on each level. Under the amended proposal, truck access will be provided directly to the ground level from Burrows Road, and upper-level hardstand access will be provided via a northern ramp, also from Burrows Road.
- Previously, the offices associated with the warehouse tenancies were arranged over six levels in a separate block at the northern end of the site, featuring a shared rooftop garden terrace. The revised design situates the offices in a mezzanine layout within each warehouse tenancy, each having direct access to an elevated garden terrace along the building's east and west facade.
- Previously carparking was located in an under-croft basement below the warehouse and accessed from Burrows Road. The amended design situates car parking at ground level, either externally to the building's footprint or within a ground-level under croft at the site's southern end.
- The facade has been redesigned to simplify the raked cladding panels, making them predominantly vertical while still maintaining a stepped appearance. The prominent corners of the development at the south-east and south-west extents of the building continue to feature expressive detailing.
- The proposal maintains a 6m landscaped setback to Burrows Road with a curved façade and a minimum 6m landscaped setback to Canal Road.
- The landscape design has been modified to reflect the revised site arrangement and orientation. However, the design concept retains the use of native and endemic species, as a key aspect of Connecting with Country.

Specifically, this amended SSDA now seeks consent for the following works:

- Demolition of all existing structures and buildings on site.
- Tree removal both on site and for a limited number of trees in the public domain and adjoining lot.
- Site remediation, and establishment works, including minor excavation / bulk earthworks.
- Design, construction and operation of a two-storey warehouse and distribution centre building with ancillary offices for each warehouse tenancy, including:

- Approximately 34,051sqm of total GFA, comprising:
    - 30,389sqm of warehouse and distribution centre GFA.
    - 3,353sqm of GFA for ancillary office space; and
    - End of Trip Facilities on the ground floor of 309 sqm GFA.
- Maximum building height of RL 29.70 (maximum 25m from existing ground level).
- Operation 24 hours per day seven days a week.

- Provision of on grade car parking accessed off Burrows Road which provides 145 tenant and visitor car parking spaces (including 8 accessible bays), 14 motorcycle spaces, and bicycle parking and end-of-trip facilities (including 66 bicycle parking spaces, showers, lockers and change rooms for occupants).
- New crossings to Burrows Road for truck and car access.
- Single fire and utilities services ingress crossing off Canal Road.
- Site landscaping works totalling approximately 6,856sqm (or 19.8% of the site), including
    - Two x 6-metre landscaped setback areas to both the Burrows Road and Canal Road site frontages.
    - 3,829sqm or 11.0% deep soil landscaping.
    - 3,027sqm or 8.7% of permeable paving; and
    - 5,450sqm or 15.7% tree canopy coverage.
- Provision of building / business identification and wayfinding signage.

Overall, the project has been amended to achieve the following objectives:

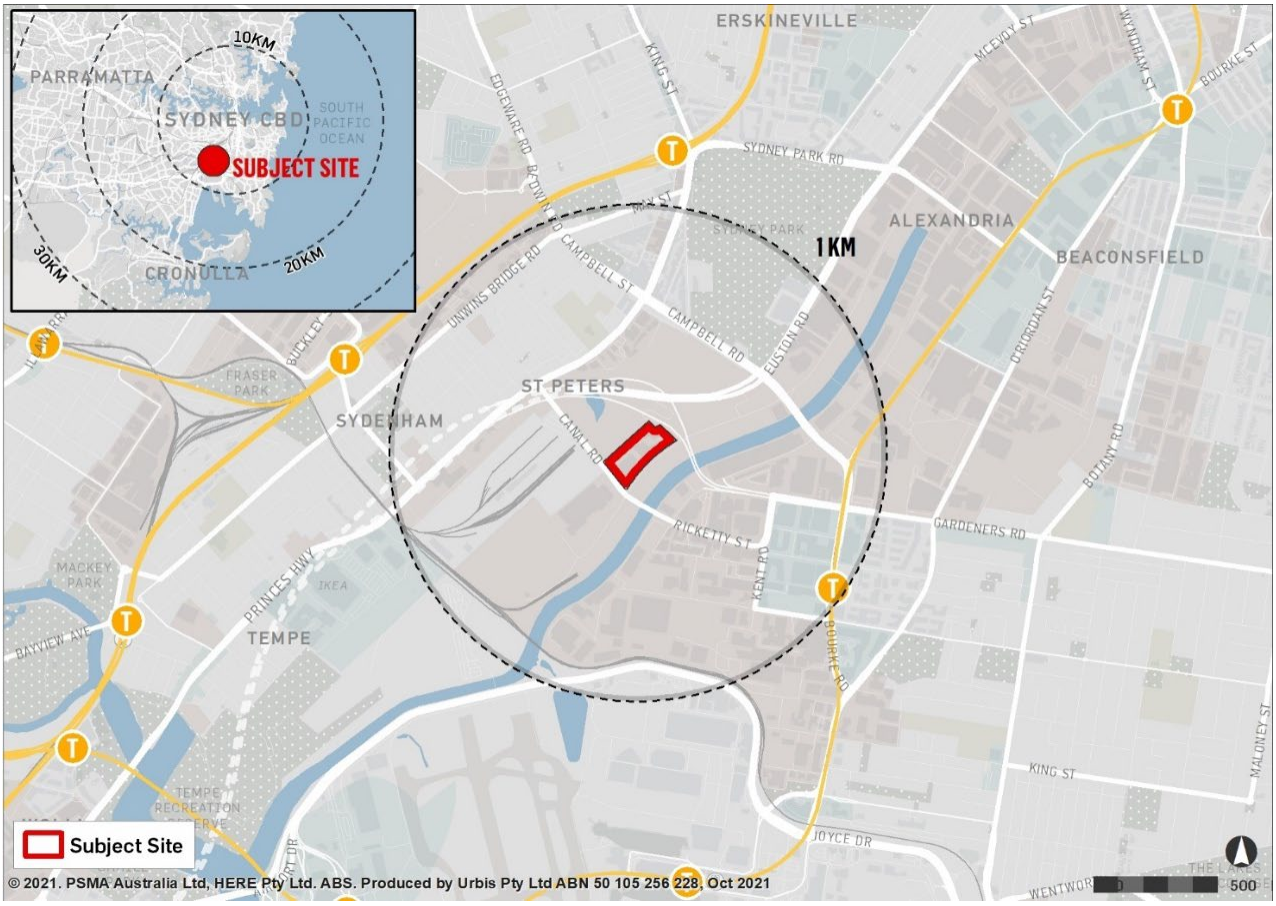
- Set the benchmark for an emerging asset class and establish the future of warehouse and distribution that will redefine Australia's premium logistics experience through the provision of a new building typology.
- Achieve best in class sustainability outcomes and architectural design, adopting materials appropriate to the building typology, its function and location.
- Contribute to the improvement of the urban environment by incorporating urban design, connection with country design principles, landscaping and sustainability as fundamental and integrated components of the overall design
- Accommodate pedestrian, cycle, vehicular and service access and circulation requirements, including the permeability of the pedestrian network between office and warehouse and throughout the warehouse building.
- Activate targeted areas of the site's interface with the public domain whilst maintaining safety and security, whilst not impacting upon functional requirements.
- Provide employee wellbeing through a positive workplace experience adopting workplace of the future design principles and amenity.
- Improve the streetscape in the local context, quality of the public domain, with integration of landscape design, placemaking and public art.

A map of the site in its regional setting is provided below.

Figure 1 Aerial Map

Source: Urbis

Figure 2 Location Context Map



Source: Urbis

1.3. PROJECT BACKGROUND

As part of its ongoing business development, Goodman is seeking to significantly increase its multi-level logistics capacity in Australia. The subject site represents a unique opportunity to realise this objective given its highly accessible location close to Sydney Airport, Port Botany, Cooks River Intermodal Terminal and the Sydney CBD.

The project will allow Goodman to increase the amount of available logistics floor space close to a major freight and logistics hubs, delivering on the demand for warehouse and distribution centres that has seen enormous growth in recent years, accelerated by the COVID-19 pandemic.

1.3.1. Planning Proposal – PP-2020-298

The applicant obtained approval on 16 September 2020 for a Planning Proposal (**PP-2020-298**) at the site. The approved Planning Proposal amended the *Sydney Local Environmental Plan 2012* (**SLEP 2012**) by increasing the applicable maximum building height for the site from 18 metres to 30 metres. The Planning Proposal also introduced a set of site-specific controls for the site, including a 6-metre setback control to Burrows Road and Canal Road for landscaping purposes.

In addition, site-specific provisions for the site were incorporated into the *Sydney Development Control Plan 2012* (**SDCP 2012**). The new clauses of the SLEP and SDCP are noted as follows:

- Clause 6.57 of SLEP 2012; and
- Section 6.3.19 of SDCP 2012.

Both the SLEP 2012 and SDCP 2012 outline key built form and design controls, as well as sustainability provisions for the site. These controls were considered throughout the competitive design process as they established the future scale, massing and overall design parameters (i.e. building envelope) for future development across the site.

1.3.2. Competitive Design Process and Design Integrity

Goodman invited eight local architecture firms to take part in an expression of interest (**EOI**) process, whereby all EOI participants were to provide responses addressing various items outlined in a returnable schedule.

Following the EOI process, three competitors were shortlisted and invited to participate in the Competitive Design Process and prepare design proposals for the site in response to the Competition Brief. The three architectural firms that participated in the Competitive Design Process were:

- Architectus.
- FJMT Studio, and
- Welsh and Major.

All three competitors participated in the Competitive Process and produced a final submission for consideration and assessment by the Competition Jury (**Jury**). An analysis and evaluation of the designs was undertaken in accordance with the evaluation criteria contained within the Competition Brief. This included the design, planning and commercial objectives of the Brief and compliance with the relevant planning controls (LEP and DCP).

The Competitive Design Process resulted in a winning scheme that was determined by the Jury to demonstrate the potential for the highest design quality. The Jury resolved that the Welsh and Major scheme best demonstrated the ability to achieve design excellence as per Clause 6.21 of the Sydney LEP 2012 and the scheme which best met the design, planning and commercial objectives of the Competition Brief. The Welsh and Major scheme was subsequently awarded the winner of the Competitive Design Process.

The Jury's recommendation identified several design elements that should be retained to achieve design excellence. The Jury also made recommendations regarding design development matters that were required to be address in the future detailed design SSDA phase of the project.

Welsh and Major Architects presented the proposed scheme to the Design Integrity Panel (**DIP**) on 4 August 2022 for their review and feedback following design development since the conclusion of the design competition in March 2022. The DIP comprised the full Jury from the design competition.

1.3.3. Scoping Study and Request for SEARs

In accordance with Section 175 of the *Environmental Planning and Assessment Regulations 2021* (**the Regulations**), a Scoping Study was undertaken in January 2022 and an application was submitted to the Planning Secretary for the issuance of the Secretary's Environmental Assessment Requirements (**SEARs**) with respect to the proposed development.

On 7 February 2022, the Secretary issued SEARs for the project under Section 4.39 of the EP&A Act. **Appendix A** identifies where in this ADR each of the SEARs requirements are addressed.

Section 4.36(2) of the 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 an estimated development cost (**EDC**) in excess of $30 million for the purposes of '*warehouses or distribution centres (including container storage facilities) at one location and related to the same operation*', under Schedule 1, Clause 12(1) of the *State Environmental Planning Policy (Planning Systems) 2021* (**Planning Systems SEPP**). Notably, the $30 Million threshold above remains relevant, as the SEARs were issued prior to 1 June 2023.

The Minister for Planning is the consent authority for the proposal in accordance with section 4.5 of the EP&A Act. Accordingly, the original SSDA was lodged with the then DPIE seeking development consent for the proposal.

It is noted that this amended application remains above the EDC threshold for warehouse and distribution centres. The project continues to rely on the originally issued SEARs.

1.3.4. Assessment History

SSD-35962232 was lodged with the then Department of Planning and Environment (DPE) in November 2022 with public notification undertaken between 18 November 2022 to 15 December 2022.

A number of submissions were received from government agencies and the public. These submissions were addressed in a comprehensive Submissions Report dated 27 April 2023.

On receipt of the Submissions Report, further comments were received from the following Agencies:

- NSW Department of Planning, Housing and Infrastructure **(DPHI)**.
- NSW State Emergency Service **(SES)**.
- Bayside Council.
- Inner West Council.
- NSW Department of Planning Environment and Heritage Group **(EHG)**.
- Transport for NSW **(TfNSW)**.
- City of Sydney.
- NSW Environment Protection Authority **(EPA)**.
- Civil Aviation Safety Authority **(CASA)**.

These submissions have been addressed within this ADR and the Response to Submissions attached as **Appendix II.**

1.3.5. Change in Project Direction

Constructability Analysis

Goodman has undertaken design evolution to address matters raised by authorities and DPHI during their review of the proposal.

To prepare for project construction, Goodman completed a detailed 20-week Early Contractor Involvement (**ECI**) process with a prospective building contractor which began in February 2023. The ECI scrutinised various alternative construction methodologies, procurement strategies, design rationalisation and simplification to understand an acceptable total construction cost.

This ECI process identified a continuing theme of significant price escalation, focused on the complexity of the ramps, methodology of structure on a constrained site, façade design and installation. The outcomes of the ECI process were validated by a second prospective builder.

In addition to the ECI process, Goodman has undertaken further market engagement to understand business critical operation drivers for multi-level warehousing and its future users, on this site.

This, together with total development cost considerations, has driven a change in design and operational requirements to provide a more functional and usable building for future customers occupying the facility. Notably, these investigations have identified the demand for larger tenancies, larger more generous hardstands, and greater storage volume capacity within the tenancies.

The outcome of this ECI process has demonstrated that the original project design was not viable to construct and operate in its proposed form. Due to the length of time since the initial design brief was completed, the design as proposed also does not respond to market or tenant requirements in this area of south Sydney. The rental income needed to support the feasibility of the project has therefore escalated to a level that has significantly diminished the breadth of target occupants, further strengthening the requirement to provide greater utility and functionality to ensure efficient movement of goods, and volume to provide greater density of storage of goods.

Goodman is not able to progress with the project in its originally proposed form and is now seeking an option of progressing with a more modest refined scheme that will better address market conditions and will ensure a feasible development that can be delivered.

Design Integrity Process

Since this time, the Proponent has continued to engage with DPHI (as the consent authority) and the DIP (primarily the Panel chair from GANSW), as well as representatives from the City of Sydney Council. Engagement has been focused on establishing a process to progress consideration of a revised scheme that retains established design excellence elements from the competition held and capitalises on the pre-lodgement design integrity process e with the competition winning architects and DIP.

Advice was received from the City of Sydney on 26 September 2023 which set out its expectations for any revised design:

> *The City acknowledges that design proposals from a competitive design process are concepts only and any technical resolution is preliminary. It is understood that, while maintaining design integrity, the winning scheme must undergo design development and address technical items and jury recommendations in concert with other matters to demonstrate the achievement of design excellence in any subsequent Detailed Development Application.*
>
> *The City's position is that the proponent needs to re-explore and potentially demonstrate that an amended scheme is substantially the same as Welsh & Major's winning design competition scheme. We recommend that Welsh & Major lead this exploration to demonstrate that they can produce a design that is substantially the same, whilst addressing Goodman's revised performance requirements.*

DPHI and GANSW supported the process outlined by the City of Sydney noting that it will support the delivery of design excellence whilst also ensuring that planning requirements and changes to the performance brief can be met.

Accordingly, Welsh and Major (and relevant sub-consultants) have embarked on a design exploration process with the Proponent to prepare a more modest revised scheme which is capable of being, in a design sense, substantially the same as their previous scheme, whilst responding to the revised objectives and performance requirements.

The DIP reconvened on 26 February 2024 to consider whether the revised two-storey scheme was substantially the same with the concept design competition winning scheme originally prepared by Welsh and Major. Following the session, the DIP determined:

- The refined concept addresses and retains the majority of the key design elements / concepts of the original (competition winning) scheme; and
- Is well on track to demonstrate that it is 'substantially the same' to the winning scheme from the design competition.

Following another session held on 5 August 2024, the DIP confirmed:

- The level of design resolution appropriately responded to the DIP outstanding matters.
- The design as presented retains design integrity with the competition winning scheme; and
- Is appropriate to support an amended DA.

The relevant DIP Letters are appended to this Amendment Report.

Section 37 Amendment

Following a teleconference with DPHI assessments staff on 2 September 2024, where the revised scheme was presented, a formal request to amend SSD-35962232 was sought in accordance with Section 37 of the *Environmental Planning and Assessment Regulation 2021*. This formal letter request was sent on 9 October 2024 and is appended to this Amendment Report.

In discussions with DPHI prior to, during and after the DIP process, it was noted that the design was to demonstrate, from a design integrity perspective, that the revised scheme is 'substantially the same' as the design competition winning scheme. This is not the same as the test applied under s4.55 of the EP&A Act, and the amended SSDA does not need to address the s4.55 tests as part of this resubmission.

2. STRATEGIC CONTEXT

This section of the ADR describes the way in which the proposal addresses the strategic planning policies relevant to the site. It identifies the key strategic issues relevant to the assessment and evaluation of the project, each of which are addressed in further detail in **Section 6** of this ADR.

2.1. PROJECT JUSTIFICATION

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

2.1.1. Greater Sydney Region Plan: A Metropolis of Three Cities

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

The Region Plan includes objectives and strategies for infrastructure and collaboration, liveability, productivity and sustainability. The following matters are relevant to the proposed development:

- *Objective 15: The Eastern, GPOP and Western Economic Corridors are better connected and more competitive.*

  The proposal will deliver a significant amount of employment generating floorspace and job opportunities in the Eastern Economic Corridor. The site is strategically located in proximity to Sydney Airport and Port Botany, supporting the ongoing growth and utilisation of these trade gateways to boost the productivity of the region.

- *Objective 16: Freight and logistics network is competitive and efficient.*

  The proposal will provide a multi-storey warehouse and distribution centre which will contribute to continued growth of the freight and logistics network in South Sydney. The proposal will leverage off Sydney's two nationally significant trade gateways of the established freight network, being Port Botany and Sydney Airport, and is also situated adjacent to the St Peters WestConnex site.

- *Objective 23: Industrial and urban services land is planned, retained and managed.*

  The proposal will deliver 52,150sqm of warehouse and distribution and ancillary office floorspace which will support the retention and management of industrial land within the established Southern Employment Lands area. The proposal will generate over 500 jobs, an increase from the existing 20 jobs on site.

2.1.2. Our Greater Sydney 2056: Eastern City District Plan

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

The District Plan contains strategic directions, planning priorities and actions that seek to implement the objectives and strategies within the Region Plan at the district-level. The Structure Plan identifies the key centres, economic and employment locations, land release and urban renewal areas and existing and future transport infrastructure to deliver growth aspirations.

The planning priorities and actions likely to have implications for the proposed development are listed and discussed below:

- *Planning Priority E9: Growing international trade gateways.*

  The proposal is strategically located close to Port Botany and Sydney Airport which are both international trade gateways. The proposal will provide additional floor space for warehouse and distribution centres that will assist in the growth of and leverage off these key trade gateways.

- *Planning Priority E11 – Growing investment, business opportunities and jobs in strategic centres.*

The proposed development will protect and enhance jobs in the Southern Employment lands, supporting the Green Square-Mascot precinct with over 400 new jobs and renewal of the existing brownfield site. The proposed will bolster the existing industrial character via the warehouse and distribution uses, facilitating greater opportunities for investment in the area.

- *Planning Priority E12: Retaining and managing industrial and urban services land.*

  The proposal will provide 34,051sqm of floorspace associated with a new multi-storey warehouse and distribution building typology which is located within the established Southern Employment Lands industrial area. The building will be utilised for warehouse and distribution purposes and contribute towards local and regional job opportunities, including 684 construction jobs and over 400 operational jobs.

2.1.3. City of Sydney Local Strategic Planning Statement

City of Sydney Local Strategic Planning Statement (**LSPS**) 2036 provides the framework and vision for land use planning for the next 20 years in the City of Sydney Local Government Area (**LGA**). The LSPS seeks to implement the Region Plan and District Plan, recognising the strategic importance of the Eastern Economic Corridor and retaining and protecting industrial zoned land for industrial manufacturing and warehousing uses and urban services.

One of the Key Moves is to '*Protect and evolve business in the Southern Enterprise Area*'. This is supported by Priority P3 – '*Protecting industrial and urban services in the Southern Enterprise Area and evolving businesses in the Green Square-Mascot Strategic Centre*'.

The Green Square-Mascot Strategic Centre, including the Southern Enterprise Area may accommodate up to 11,400 additional jobs by 2036 to meet the District Plan's baseline jobs target.

The Proposal supports this Key Move and Priority as it proposes to retain and redevelop an existing industrial site for improved warehouse and distribution purposes. The proposal will provide 30,389sqm of high-quality, modern logistics floor space and generate over 400 new direct jobs which will help support the growth of the Southern Enterprise Area and Green Square-Mascot Strategic Centre.

2.1.4. Better Placed

The Government Architect for NSW (**GANSW**) released *Better Placed* in 2017, an integrated design policy which seeks to establish design thinking and objectives that enhance the design quality of built environments and raise the standards for creating better environments. It outlines seven distinct objectives that define key design considerations that address key challenges and directions and creates good design outcomes for NSW.

The proposed development is consistent with the Better Placed objectives for the following reasons:

- **Objective 1 – Better Fit:** the proposal will integrate the existing established industrial context and character of St Peters and the broader surrounding area.
- **Objective 2 – Better Performance:** the proposal incorporates a range of passive and other sustainability measures to ensure the building operates with high environmental performance into the future.
- **Objective 3 – Better for community:** the proposal incorporates 'Connecting with Country' principles through a landscape outcome and public art strategy. The development supports a diversity of uses for on-site workers (warehousing with ancillary office) and is capable of complying with relevant Access/BCA provisions.
- **Objective 4 – Better for People:** the proposal provides a considered landscape and public domain design outcome. The human scale is respected along the public domain frontages and within the ground plane within and surrounding the site.
- **Objective 5 – Better Working:** the building is specifically designed to accommodate the logistics and functional requirements of this unique building typology.
- **Objective 6 – Better Value:** the proposal will contribute to economic prosperity both now and into the future.

- **Objective 7 – Better Look and Feel:** the proposal has undergone a rigorous design competition and review process to deliver a built form outcome which exhibits design excellence through architectural treatments and a robust landscape / public domain response.

The proposed development clearly incorporates the objectives the Better Placed integrated design policy.

2.1.5. Sustainable Sydney 2030-2050: Continuing the Vision

Sustainable Sydney 2030 -2050*: Continuing the Vision* (**Sustainable Sydney**) is the City of Sydney's overarching strategic plan to promote a sustainable future prioritising just and sustainable growth resulting in 10 targets and 10 strategic directions. Of the targets set in *Sustainable Sydney*, the following are exemplified in the proposed development:

- **1 \\ By 2035 we will achieve net zero emissions**: ESD measures integrated into the proposed development.
- **5 \\ By 2036 there will be approximately 700,000 jobs**: The proposed development will produce over 500 jobs, well in excess of the existing development and working towards providing secure job opportunities to the City of Sydney LGA.
- **8 \\ By 2050 people will use public transport, walk or cycle to travel to and from work**: Use of sustainable transport options such as public transport, bicycling and walking are encouraged and promoted as part of the proposed development. End of Trip Facilities (**EOTF**) are all accommodated onsite with a Green Travel Plan provided as part of this application to work towards the 2 out of 3 people use goal.

The strategic directions relevant to the proposed development are:

- **4 \\ Design excellence and sustainable development**: A design excellence process has successfully been undertaken as part of the SSDA preparation, the successful submission integrating sustainable materials and building practises.
- **5 \\ A city for walking, cycling and public transport**: the proposed development will enhance the surrounding streetscapes and bicycling networks, with a location and design that promotes many sustainable transport options. Furthermore, the landscaping proposed will not only soften the built form but contribute to the overall amenity of the St Peters public domain.
- **9 \\ A transformed and innovative economy**: The innovative multi-level warehouse and distribution centre proposed clearly demonstrates a move, from an industrial area point-of-view to a more efficient and attractive centre to drive the future of the southern employment lands and responding to current economic drivers for warehouse and distribution centre uses.

The proposed development aligns with the principles and strives for the targets established in this continuation of the *Sustainable Sydney* strategy.

2.1.6. City of Sydney Employment Lands Strategy 2014-2019

The City of Sydney released the *Employment Lands Strategy* in June 2014 to guide growth and change in City of Sydney based employment lands through to 2030. Relevant to the proposed development, the *Employment Lands Strategy* incorporates sites within the 'southern employment lands' and focuses primarily on this employment lands area. The vision for the employment lands is to facilitate new business and industry opportunities across a range of sectors, propagating more flexible approaches to higher density employment and new economic activities in context of a planning proposal to SLEP 2012. This planning proposed was gazetted and adopted in March 2015. Of the strategic directions highlighted in this strategy, the following are exemplified and bolstered in the proposed development and land uses:

- **Implement planning solutions that work towards the objectives and targets provided by Sustainable Sydney 2030** – the proposed development, in the context of the now gazetted planning proposal for the southern employment lands, work within the applicable planning controls and reflects the values and vision of *Sustainable Sydney 2030*.
- **Encourage a sustainable, high quality and functional built form that respects the history of the southern employment lands** – the proposed development, being a greater utilisation of the existing warehouse and distribution centre with a design that meets ESD targets, reinforces the sustainability outcomes for the southern employment lands.

2.2. KEY FEATURES OF SITE AND SURROUNDS

The site is located at 1-3 Burrows Road, St Peters. The site comprises two parcels of land (allotments) and is legally described as Lot 1 DP 1227450 and Lot 11 DP 606737.

The site is an irregular shaped allotment with a total area of approximately 34,614sqm. The site adjoins Burrows Road to the east with a primary curved frontage of approximately 280 metres and adjoins Canal Road to the west with a secondary frontage of approximately 140 metres.

The site is in the City of Sydney Local Government Area (**LGA**), at the junction with the Inner West and Bayside LGA's. The site is situated to the immediate south of the St Peters WestConnex Interchange and well-connected to the Sydney Airport.

An aerial image of the site is illustrated in **Figure 3**. Photographs of the site and the locality in its current condition are provided in **Figure 4**.

Figure 3 Aerial Image of the site

Source: Urbis / NearMap

Figure 4 Site and Locality Photographs

Picture 1 View of site (north-east corner) from Burrows Road

Picture 2 View at mid-point of site facing north-west from Burrows Road

Picture 3 View of site (south-east corner) from intersection of Burrows and Canal Roads

Picture 4 View south-east from Canal Road showing rear of site.

Picture 5 View of site (north-west) from the St Peter's WestConnex bridge (during construction)

Picture 6 View of Burrows Road frontage looking south

Source: Goodman

The key features of the site are summarised in the table below.

Table 2 Key Features of Site and Locality

Descriptor	Site Details
Land Configuration	Site area: 34,614sqm (approx.) Site boundaries (length and depth): • Burrows Road (south) (primary frontage) – 280m (approx.) • Canal Road (west) (secondary frontage) – 146m (approx.) Topography: The site topography is relatively flat with a slight fall of approximately 2-2.7m from north-west to south-east.
Land Ownership	The site is owned by Goodman South Sydney Pty Limited ACN 668 441 889 as Trustee of Goodman Burrows Trust.
Existing Development	The site is currently occupied by older low-rise industrial units that are largely consistent with development in the surrounding area which is predominantly of an industrial nature. The industrial units comprise four large format steel framed warehouse / distribution facilities. These buildings no longer meet the requirements of contemporary industrial users in this market. The largest existing warehouse building is situated in the south-west corner of the site at the corner of Burrows Road and Canal Road.
Local and Regional Context	The site is situated within an established largely industrial area. The site is surrounded by existing industrial and commercial developments to the north-east, south-east and south-west. The Alexandra Canal is located approximately 100 metres to the south-east and east. The site is strategically located within proximity to Sydney Airport (situated approximately 700 metres to the south) and Port Botany (situated approximately 6km to the south-east). The Cooks River Intermodal Terminal, a container storage yard, is located about 100 metres northwest of the site. To the west and north, the site borders the newly completed St Peters WestConnex Interchange, providing links to the new M8 tunnel, and future links to M4 / M5 Tunnels and Sydney Gateway. A large “viewing mound” area is located to the west of the site within the St Peters WestConnex Interchange site. The site is proximate to several open space areas, most notably, the significant open space area of Sydney Park is located approximately 400 metres to the north-east.
Infrastructure	The site is currently bounded by Canal Road to the south, a classified road under the *Roads Act 1993*, and Burrows Road to the east. The site is also connected to the Princes Highway via Canal Road, Gardeners Road and the WestConnex. The M4-M5 Link Tunnels (currently under construction) will link the St Peters Interchange to the new M4 Tunnels in Haberfield and the Rozelle Interchange (also under construction). These

Descriptor	Site Details
	existing and future connections provide excellent access from the site to the regional road network. From Canal Road and Burrows Road, the site is interconnected to the local road network and surrounding areas, including Sydney CBD, Sydney Airport, Port Botany, and surrounding eastern, inner west and inner south suburbs. The Utilities Review Update prepared by AT&L and Edgewater Connections provides a review of the existing utilities infrastructure onsite. The following assets are currently within the vicinity of the site: ▪ Electrical. ▪ Telecommunications. ▪ Water, Sewer, Stormwater and Gas; and ▪ Fibre networking cables.
Site Access and Road Hierarchy	Vehicle access to the site is currently provided via two existing two-way driveways accessed off Burrows Road. One is situated mid-way along the Burrows Road frontage whilst the other is located at the north-east corner of the site. A large concrete hardstand parking area is situated in the north-western rear portion of the site. The north-east portion of the site is also covered with a concrete slab hardstand area. The site is located at the intersection of Burrows Road and Canal Road. Burrows Road is a local road running north-south and parallel to the Princes Highway with a posted speed limit of 50km/h and one lane of through traffic in each direction with kerbside on-street parking. Burrows Road connects the site directly to Sydney Park (via Campbell Road) and the suburb of Alexandria and is used to access businesses and industrial units fronting Alexandra Canal. Canal Road is a State road running east-west perpendicular to Burrows Road with a posted speed limit of 60km/h and four lanes (two lanes in each direction) with “no stopping” and “clearway” restrictions on both sides. Canal Road is a primary route for heavy vehicles and connects to the A36 / King Street in the north and beyond to Sydney Airport via Gardeners Road / Botany Road in the south and south-east. Direct vehicle access to the site is provided via two existing two-way driveways accessed directly off Burrows Road. One is situated in the north-east corner of the site whilst the other is located mid-way along the Burrows Road frontage.
Easements and Covenants	(A) – Right of way and easement for electricity purposes variable width (VIA Z 571492).

Descriptor	Site Details
Services	The site is within an established industrial area with availability to existing services for power, gas, water and sewer mains, stormwater and telecommunications networks.
Acid Sulfate Soils (**ASS**)	Mapped as Class 3 ASS under the Sydney LEP 2012. The Soil Salinity Investigation prepared by PSM concluded that ASS do not impact the site or any proposed works.
Contamination	A Phase 1 and 2 Environmental Site Assessment (**ESA**) was undertaken by AECOM as part of the Planning Proposal (**PP-2020-298**). The boreholes identified the presence of contaminated fill material to an average depth of 3.5m across the site. In addition, groundwater contains concentrations of metal. The contamination identified in the fill material will require implementation of management controls during site redevelopment as outlined within a Remedial Action Plan (**RAP**).
Stormwater and Flooding	The site is within the floodplain and consideration to flooding and flood impact is required. The site is affected by mainstream flooding associated with overland flows in the local 1% AEP flood event and manifests as gutter flows in Canal Road. Ponding on the rear of the site in the pre-development condition is related to high tailwater levels in Alexandra Canal and low-lying nature of the area.
Bushfire Prone Land	The site is not bushfire prone land.
Flora and Fauna	Some mature tree vegetation exists along the Burrows Road and Canal Road frontages, predominantly outside the property boundary. Specifically, the site has a total of 64 trees which comprise 19 species, located within or adjacent to the site.
Aboriginal Heritage	The Aboriginal Cultural Heritage Assessment Report (**ACHAR**) prepared by Artefact determined that the site has nil-low archaeological potential to retain intact archaeological deposits that may contain Aboriginal objects. Therefore, no further archaeological investigation is recommended.
European Heritage	No heritage items on the site or immediately adjacent land and the site are not within or near a heritage conservation area. The State heritage listed Alexandra Canal is located substantially away from the site approximately 100 metres to the south-east / east.

2.3. FUTURE PROJECTS PROXIMATE TO THE SITE

The site is located within the central precinct of St Peters. The Southern Enterprise Area has seen progressive renewal over the last 5-10 years. Approved and likely future developments which may be relevant in the cumulative impact assessment of the proposal are summarised in the following table.

Table 3 Approved and Likely Future Developments

DA Reference	Development Description	Current Status
SSD-32489140	Ascent Logistics Centre – construction and operation of a multi-level warehouse and distribution facility located at 520 Gardeners Road, Alexandria.	Approved
SSD-47601708	Sydney Flight Training Centre – demolition of existing industrial buildings and the construction and operation of a flight training facility and associated infrastructure at 28-30 Burrows Road, St Peters.	Approved
SSD-42544484	Gardeners Road Multi Level Warehouse Alexandria – construction and operation of a two storey multi-level warehouse and distribution facility located at 546-548 Gardeners Road, Alexandria.	Approved
SSI-6788	WestConnex – new M5 (under construction adjacent to site).	Approved
D/2021/45	Four storey data centre fronting Gardeners Road (Stage 2) at 504-506 Gardeners Road, Alexandria.	Approved
D2020/625	Construction of a multi-level industrial facility at 45 Burrows Road, Alexandria.	Approved
D/2017/1797	Concept approval of a 3 and 4 storey building for use as high technology industry, including the approval of Stage 1 buildings works comprising construction of the 3 storey building, internal roads, car parking and landscaping at 504-506 Gardeners Road, Alexandria.	Approved
D/2014/453	Construction of new three storey industrial building for use as a data centre, with hours of operation 24 hours a day, Monday to Sunday inclusive. Includes new driveway to Bourke Road, car parking, fencing, gates and landscaping at 200 Bourke Road, Alexandria.	Approved

2.4. FEASIBLE ALTERNATIVES

Clause 192(1)(c) in Division 5 of Part 8 of the *Environmental Planning and Assessment Regulation 2021* (**EP&A Regulation**) requires an analysis of any feasible alternatives to the proposed development, including the consequences of not carrying out the development.

Goodman identified three project alternatives, beyond the “do nothing” scenario, which were considered in respect to the identified need for the proposed multi-level warehouse and distribution centre. Each of these options is listed and discussed in the following table.

Table 4 Project Alternatives

Option	Assessment
Option 1 – Do Nothing	The “do nothing” option was dismissed as it would compromise the objectives of the proposal. No development would result in the existing industrial buildings on-site becoming increasingly underutilised and

Option	Assessment
	eventually they would deteriorate, given they do not meet the requirements of the contemporary industrial users in this market. Effectively, the site would not realise its employment generating potential and would not leverage off the site's access to nearby freight transport nodes, thus, not contribute to economic development of St Peters and the Southern Employment Lands. In addition, the proposed landscape and public domain improvements and public art offering would not be delivered to the detriment of the surrounding area and the construction and operational jobs provided by the proposal would not be available to the community.
Option 2 – Alternative Location	Consideration was given to other sites Goodman owned within the South Sydney industrial area. However, these sites were not determined as being preferrable given they were not as well located proximate to existing transport networks including Sydney Airport, Port Botany and the surrounding road network (including the adjacent St Peters West Connex site). This limits the access opportunities to support the functional purpose of the use and would fail to leverage off existing transport infrastructure opportunities. The Planning Proposal PP-2020-298 clearly established the strategic merit for the site to deliver a substantial warehouse and distribution centre including allowance for additional building height. In addition, the alternative sites / locations considered did not provide the necessary size and layout requirements to deliver a large scale warehouse and distribution centre. Given the limited size afforded by other sites, there were limited opportunities to deliver a sufficient amount of warehouse and distribution centre floorspace whilst accommodating the functional and operational requirements for this building typology, such as the large one-way vehicle circulation ramps which provide heavy vehicle access throughout the site. Being able to support these necessary functionality requirements is crucial to the successful operation of the proposal. The site is also well situated on the corner of two roads and immediately adjacent to the St Peters WestConnex Interchange. These developments and other surrounding industrial sites do not represent sensitive land uses that will be significantly impacted by the proposal. The proposal is compatible with the surrounding locality and emerging built form character. The assessment provided as part of this EIS confirms that the proposal will not result in any adverse economic, environmental or social impact.

Option	Assessment
Option 3 – Alternative Design	Prior to the Proponent's successful Planning Proposal outcome, extensive due diligence, options testing and design development was progressed to test necessary functional requirements of multi-level design that could be achieved on the site, whilst accommodating required access and circulation needs to service a third level. Subsequently, a reference scheme was prepared as part of the Planning Proposal which was the culmination of this work. The reference scheme was included as part of Competition Design Brief as a guide to articulate the functional requirements and spatial relationships of the various components of multi-level warehousing. As documented in the Design Competition Report, three different design schemes were considered by the Jury as part of the design alternatives process. The two unsuccessful competition schemes explored alternative design and layout options such as locating the ancillary office building on the south-east corner of the site. This was considered an inferior outcome due to the harshness of the Canal Road environment for pedestrians and was less cognisant of occupant amenity. The other scheme options also considered differing architectural designs with regards to massing / modulation, articulation and materiality. The Jury determined that the winning scheme provided the most convincing response to the design, planning and commercial objectives of the project, noting it was considered the most capable of achieving design excellence. The Project is justified on the basis that it is compatible with the locality in which it is proposed, resulting in economic benefits and can achieve the overall Project's objectives, whilst managing and mitigating any potentially adverse environmental impacts.
Option 4 – The proposed development (preferred option)	Different locations were investigated, and two other designs were considered, as well as a previous (three storey) iteration of the proposed scheme. The site was identified as being the most suitable location for the proposed warehouse and distribution centre and the final design was considered to deliver design excellence for the following reasons: ▪ It is consistent with the design and commercial objectives for the project as established under the competitive design process *and subsequent ECI and market testing phases.* ▪ The proposal achieves design excellence *notwithstanding the change in scope* and has been endorsed by the DIP. ▪ The proposal facilitates the orderly and efficient use of a brownfield site and delivers sustainable development. ▪ The proposal is consistent with zone objectives and permitted with consent within the E4 General Industrial zone.

Option	Assessment
	▪ The design delivers employment generating floorspace and job opportunities within the Eastern Economic Corridor. ▪ The proposal leverages off proximity to key transport nodes including Sydney Airport and Port Botany, and benefits from access to the surrounding regional road network including the new St Peters West Connex site situated immediately to the north of the site. ▪ The proposal is compatible with surrounding development and will result in minimal impact on the environment, subject to implementation of suitable mitigation measures; and ▪ The proposal will not result in unacceptable environmental impacts including in relation to ecology, biodiversity, heritage, noise and views.

3. DESCRIPTION OF THE AMENDMENTS

This section of the report describes the proposed amendments to SSD-35962232 from the scheme originally lodged and provides a comparative analysis of the original development and amended proposal. It also includes an updated detailed description of the various components of the proposal, including the proposed amendments.

3.1. OVERVIEW AND COMPARATIVE ANALYSIS

The original proposal was for a multi-storey warehouse and distribution centre at the site with ancillary office and cafe. The amended proposal removes one level from the scheme and simplifies the building forms.

The proposed amendments to the original development application lodged with DPE are listed and briefly described below:

- Reduction of the proposed warehouse from 3 storeys (30.14m) to 2 storeys (25m). Despite the reduction of 1 storey, the building height has been reduced by approximately 5m. The remaining 2 storeys have increased in height to provide a more efficient warehouse facility.
- Re-orientation of the layout from an east-west central hardstand with smaller warehouse tenancies on the north and south, to a north-south central hardstand with larger/deeper warehouse tenancies on the east and west. This provides for more efficient warehouse layouts and truck access.
- Previously, truck access to the warehouse tenancies was facilitated via north and south spiral ramps from Burrows Road, connecting to a north-south hardstand on each level. Under the amended proposal, truck access will be provided directly to the ground level from Burrows Road, and upper level hardstand access will be provided via a northern ramp, also from Burrows Road.
- Previously, the offices associated with the warehouse tenancies were arranged over six levels in a separate block at the northern end of the site, featuring a shared rooftop garden terrace. The revised design situates the offices in a mezzanine layout within each warehouse tenancy, each having direct access to an elevated garden terrace along the building's east and west facade.
- Previously carparking was located in an under croft basement below the warehouse and accessed from Burrows Road. The amended design situates car parking at ground level, either externally to the building's footprint or within a ground-level under croft at the site's southern end.
- The facade has been redesigned to simplify the raked cladding panels, making them predominantly vertical while still maintaining a stepped appearance. The prominent corners of the development at the south-east and south-west extents of the building continue to feature expressive detailing.
- The proposal maintains a 6m landscaped setback to Burrows Road with a curved façade and a minimum 6m landscaped setback to Canal Road.
- The landscape design has been modified to reflect the revised site arrangement and orientation. However, the design concept retains the use of native and endemic species, as a key aspect of Connecting with Country.

The updated architectural drawings are attached as **Appendix B**.

A comparative analysis has been undertaken between the original and amended development proposal in accordance with the DPE Guidelines and as shown in the following table.

Table 5 Comparison of Original and Amended Development Scheme

Element	Original Development	Amended Development	Difference
Project Area			
Bulk Earthworks	Cut: - 18,600m^3 Fill: + 41,600m^3	Cut: - 3,930m^3 Fill: + 24,450m^3	14,670m^3 less cut 17,150m^3 less full
Physical Design and Layout			

Element	Original Development	Amended Development	Difference
Total Site Area	34,614sqm	34,614sqm	Nil
Maximum Building Height	30.14m	25m	Decrease of 5.14m
Total Warehouse Area	47,076sqm	30,389sqm	Decrease of 16,687sqm
Total Office Area	5,014sqm	3,353sqm	Decrease of 1,661sqm
Total Café Area	60sqm	0sqm	Decrease of 60sqm (café removed)
Total GFA	52,150sqm	34,051sqm	Decrease of 18,099sqm
Carparking	241 car parking spaces (including 12 accessible bays)	145 car parking spaces (including 8 accessible bays)	Decrease of 96 car parking spaces
Landscaped Area	7,464 sqm (or 21.6% of the site)	6,856sqm (or 19.8% of the site)	Decrease of 608sqm
Operations			
Land Use Activity	The proposed development is for a warehouse and distribution centre with ancillary office/ amenities and a cafe space.	The proposed development is for a warehouse and distribution centre with ancillary office/ amenities.	A cafe is no longer proposed.
Hours of operation	24 hours per day, 7 days per week	24 hours per day, 7 days per week	No change.
Project Sequencing			
Staging	The development was to be carried out in one stage, with five Construction Certificate (CC) phases.	The development will continue to be carried out in one stage, with five Construction Certificate (CC) phases.	No change.

3.2. DETAILED DESCRIPTION

3.2.1. Project Area

The site has a frontage of approximately 280 metres to Burrows Road to the south-east and approximately 146 metres with Canal Road to the south-west. Further south-west, adjacent the site across Canal Road, is a one-storey warehouse and distribution centre will ancillary office. South-east of the site are a variety of one-storey warehouses and commercial buildings, as well as Alexandra Canal. Immediately north and north-west of the site is the WestConnex Interchange which is partially constructed (**Figure 5**).

The site is currently occupied by older low-rise industrial buildings that comprise four large format steel framed warehouse / distribution facilities. The site has been extensively modified, the site area being primarily warehouse or hardstand, and is generally clear of vegetation with some planting along the Canal Road and Burrows Road perimeter. The site is not subject to flooding or overland flow paths for all events to the 1% Annual Exceedance Probability (**AEP**) level.

The site is situated within the southern edge of the established industrial and business 'Southern Employment Lands' area. The land to the immediate north-west of the site is SP2 Classified Road containing the WestConnex Interchange. Remaining land surrounding the site is zoned E4 General Industry resulting in the majority industrial surrounds. The nearest residential receivers are 400m north-west and -east of the site

along Gardeners Road and Princes Highway. The total site area is expected to be physically disturbed by the proposal.

Figure 5 Site Analysis Plan

Source: Urbis

3.2.2. Physical Layout and Design

3.2.2.1. Site Layout

The site layout has considered the existing site conditions and the functional requirements of the warehouse and distribution use. The proposed development will involve:

- Construction of a warehouse and distribution centre (34,051m^2) sited centrally but covering the majority of the site consisting of two levels of warehouse space (to support eight future tenancies) with ancillary office space located across mezzanine levels (3,353m^2). Each tenancy will be directly accessible via the central enclosed breezeway on each level of the warehouse. At-grade under croft car parking is provided to the north and south of the warehouse.
- The existing ingress and egress points will be removed and replaced with three new accessways off Burrows Road and a single ingress point off Canal Road (for fire truck access only), concentrating truck movements away from the classified Canal Road.
- Heavy rigid vehicle access to and from the ground floor warehouse tenancies is provided from Burrows Road, directly into the central breezeway. Access to the second floor of the warehouse is provided via the northern crossover also from Burrows Road.
- Landscaping has been located around the Canal Road / Burrows Road 6m setback with additional planting proposed in landscape terraces adjacent to the mezzanine offices and around the south and north lobby entrances.
- On-site amenities designed to meet the needs of employees include landscaped terraces adjacent to the offices at the mezzanine level and EOT facilities adjacent to the northern lobby at the ground floor.

Figure 6 Proposed Site Plan

Source: Welsh and Major

3.2.2.2. Design and Built Form

The proposal represents best-practise design, pioneering the future of warehouse and logistics centres in Australia. The built form, subject of a design excellence integrity process evolving from the original competition winning scheme, has been designed to respond to the relevant planning controls, site characteristics and enhances the surrounding development in St Peters.

The design has been formed and inspired by elements of the site and location, integrating Designing with Country consultation with *Wanggani Dhayar* (listen to Country) outcomes, managing the scale of the building envelope approved under the planning proposal, utilising the sweeping lot form, integrating a fine-grain perforated façade, as well as achieving ESD goals. The result is a warehouse and distribution centre form that creates visual interest and avoids large blank areas of building façade.

Engaging Yerrabingin as part of the design team guided the Designing with Country response. This allowed for incorporation of design concepts including water, movement, scale, seasonality, and Care of Country all into the design. This is most emphasised in the landscaping and public art outcomes.

The layout of the warehouse has been reoriented from an east-west central hardstand with smaller warehouse tenancies on the north and south, to a north-south central hardstand with larger/deeper warehouse tenancies on the east and west. This provides for more efficient warehouse layouts and truck access.

The proposed development is setback a minimum of 6m from Canal Road and Burrows Road. These setback areas will be landscaped to soften the built form and improve pedestrian amenity at ground level. At the Northeast, Southeast and Southwest corners the architectural facade articulation feature of the flared corner detail overhangs the 6m setback. The overhang will not impact on the ability to provide landscaping within this area which is the primary purpose of the setback zone. A minimum 8.19m setback is provided to both northwestern boundary.

The location and design of the vehicle ramp has been carefully considered to minimise traffic impacts along Canal Road. The access and egress point for the ramp to Lavel 1 of the warehouse is proposed off Burrows Road. The ramp which sweeps around the north western corner off the site, has been designed to mimic the expression of movement inherent in the building function. The articulation of this ramp includes a 2.4m high crash barrier band that will partially shield vehicles from view. As the ramp rises to the upper warehouse level the screening is proposed as an opportunity for the integration of public art.

The ancillary offices have been located to correspond to the relevant warehouse tenancies and have been co-located with landscaped terraces to improve amenity for employees. Each office area is also supported by appropriate amenities and will be accessed via the northern and southern lobby's which provide both lift and stair access.

Solar panels are proposed to be distributed across the unutilised parts of the roof. The photovoltaic system will be able to generate 2,000kWp of solar power. The height of these ridge lines does not exceed 25m (RL 29.7m) which is below the 30m height limit.

Figure 7 Perspective Views

Picture 7 Burrows Road / Canal Road intersection

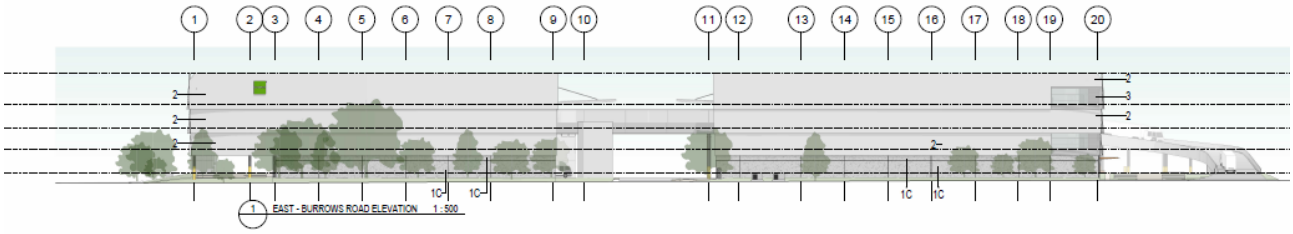
Picture 8 North Burrows Road

Picture 9 North Burrows Road (night)

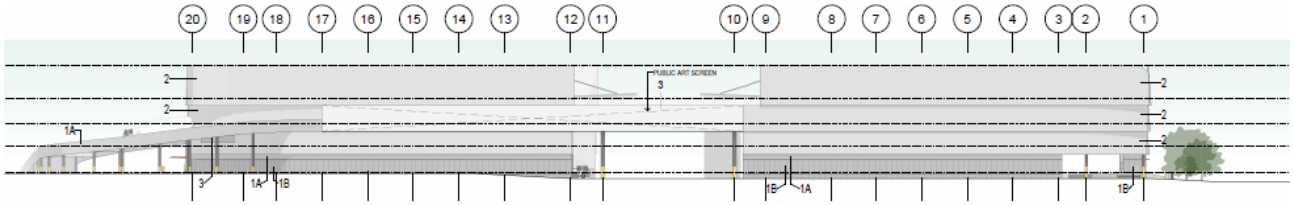
Picture 10 Western Façade

Source: Welsh + Major

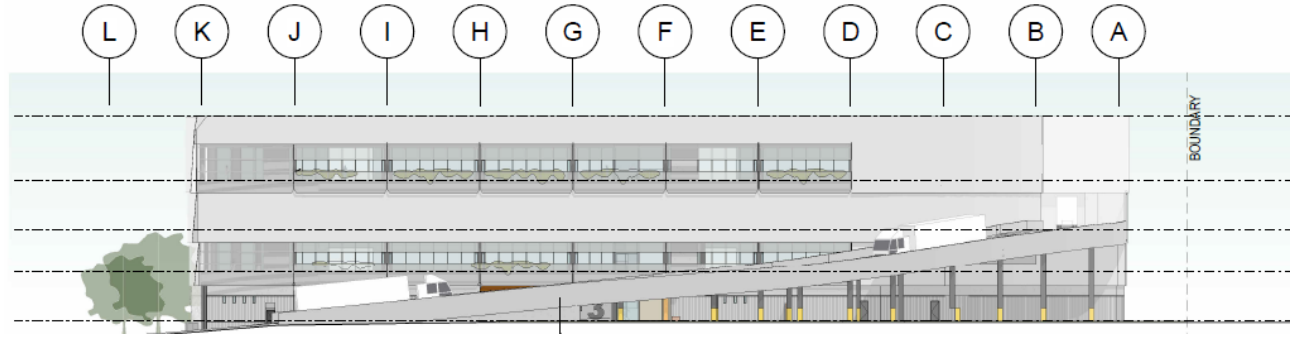
Figure 8 Proposed Elevations



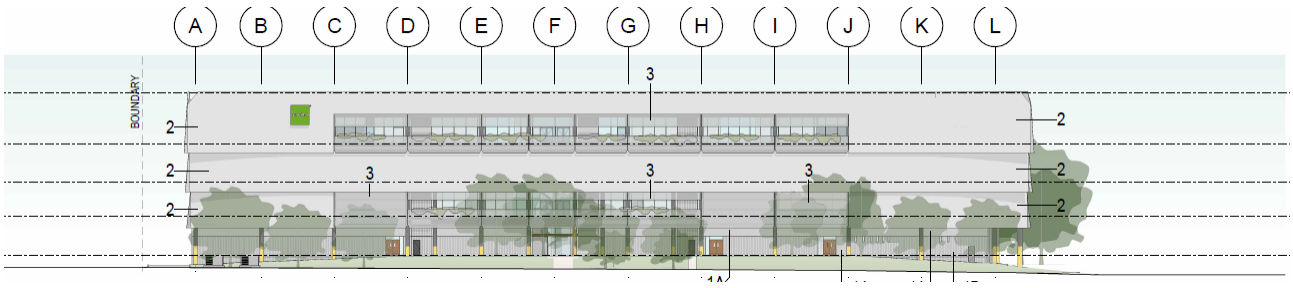
Picture 11 East Elevation (Burrows Road)



Picture 12 West Elevation



Picture 13 North Elevation



Picture 14 South Elevation (Canal Road)

Source: Welsh + Major

3.2.2.3. Landscaping & Connecting with Country

A cohesive site-wide landscape strategy has been developed, recognising and integrating Country and regenerating the endemic ecology of the place. The proposed landscaping integrates the following principles:

- Integrate the landscape typology of Place.
- Regenerate Country and connect ecologies, and
- Create human scaled environments.

In pursuit of achieving these principles, the entire landscape design integrates the history, evolution, and characteristics of the site area, specifically the Alexandra Canal, in consultation with Yerrabingin to better integrate elements of Country, all with a narrative to Gadigal placemaking through regenerative practises of native ecologies of the place. This is realised in extensive tree, shrub and group cover plantings to the site, and incorporation of sitting and gathering places to appreciate the outcomes of this design approach.

The proposal includes a total landscape area of 6,856 sqm or 19.8% of the site. This comprises 3,829sqm of deep soil area (11%), 3,027sqm of permeable paving and other landscaped areas that are not strictly “deep soil” (8.7%). Taking into account 50% of the area of permeable paving, the proposal achieves a total compliant deep soil area or 15.3% or 5,333 sqm. In addition, the proposal provides landscaped terraces adjacent to each office area. The boundary treatment provides for extensive tree and shrub plantings located in the 6-metre setback to Burrows and Canal Roads.

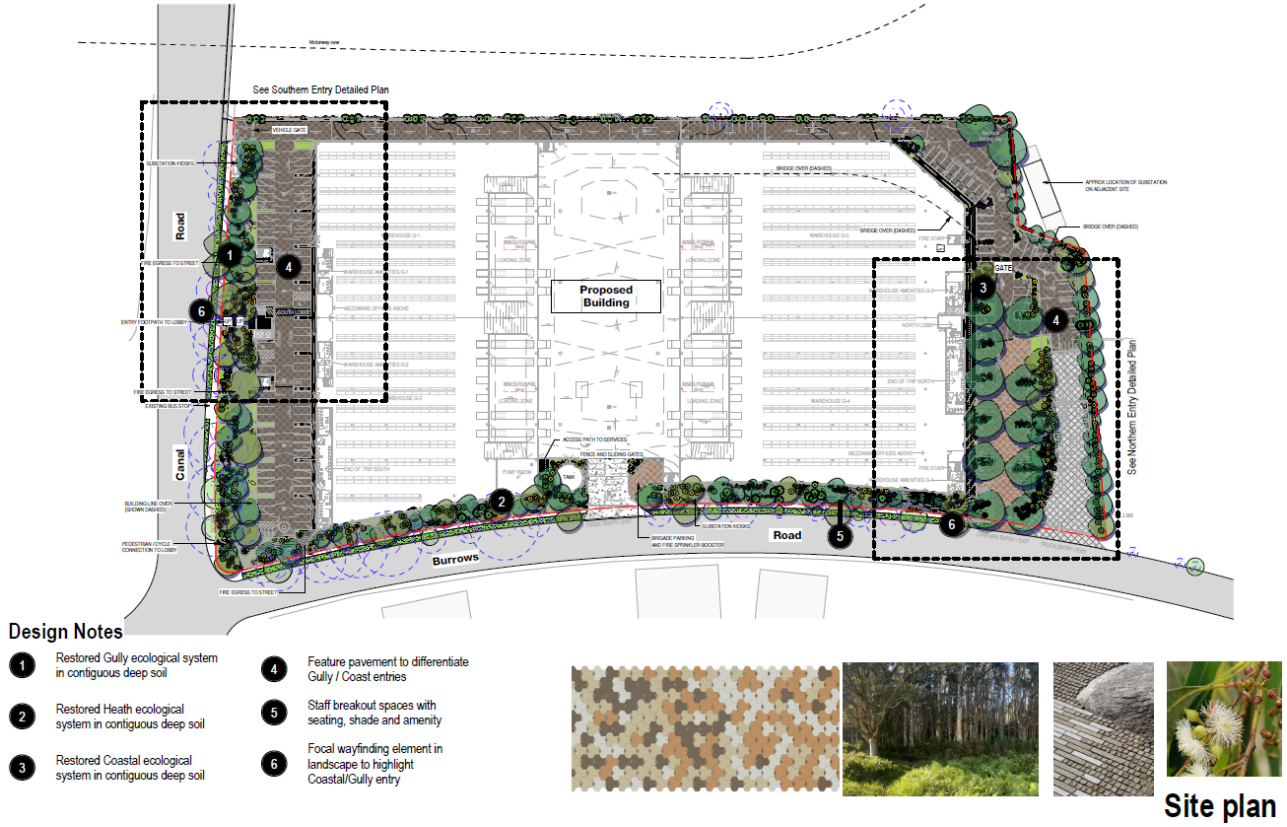
The tree canopy for the site provides an opportunity to supplement and regenerate the native canopy plantings and achieves a 15.7% site canopy coverage (5,450.04sqm), in excess of the DCP requirement for 15% canopy coverage. This is in addition to the street tree planting along Burrows Road.

Seating and breakout spaces along Burrows Road provide opportunities to enjoy these landscaped frontages, offering the employees onsite and general community a chance to experience native ecologies. The sweeping form of the Burrows Road façade imitates that of the Alexandra Canal with the ground being modulated to capture and reintegrate rainwater to the natural systems leading to the Alexandra Canal, reinforcing the regenerative and integrated design principles.

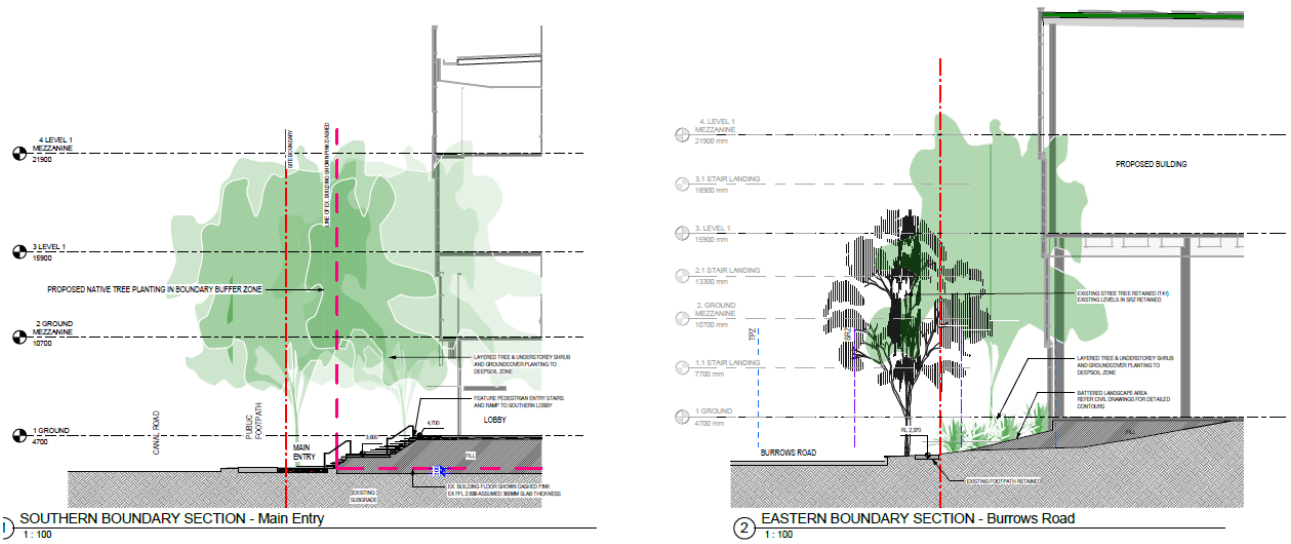
The landscape design principles continue into the lobby, with meandering graded path networks providing opportunities to sit and enjoy native vegetation and shade from the *Backhousia Myrtifolia* (Lemon Scented Myrtle) trees. The weaving pedestrian pathways form a component of the interwoven Designing with Country response, reflecting the natural flows of the Alexandra Canal pre-colonisation.

Refer to the Landscape Plans, and the Connecting with Country Updated Coast to Gully Narrative within the Design Report, which was prepared by Yerrabingin.

Figure 9 Proposed Landscape Plans



Picture 15 Site Landscaping Plan



Picture 16 Section

Source: Taylor Brammer

3.2.2.4. Public Art & Lighting Strategy

The site and proposed development sit in a highly trafficked area, adjacent to the major freeway that will see thousands of commuters pass by daily. As such, the proposal has a unique opportunity provided by the scale of the development acting as a canvas on which to paint a memorable landmark.

The previous design included this through a facade lighting proposal on Burrows Road and the facade facing the St Peters Interchange. This has been reconsidered due to potential issues with moving light displays

adjacent RMS roadways and the height and density of the proposed landscape setback along Burrows Road, both of which could reduce the impact of the previous proposal.

Further development of the public art opportunities and procurement for the amended design has been developed in conjunction with the design team, Yerrabingin and Cultural Capital.

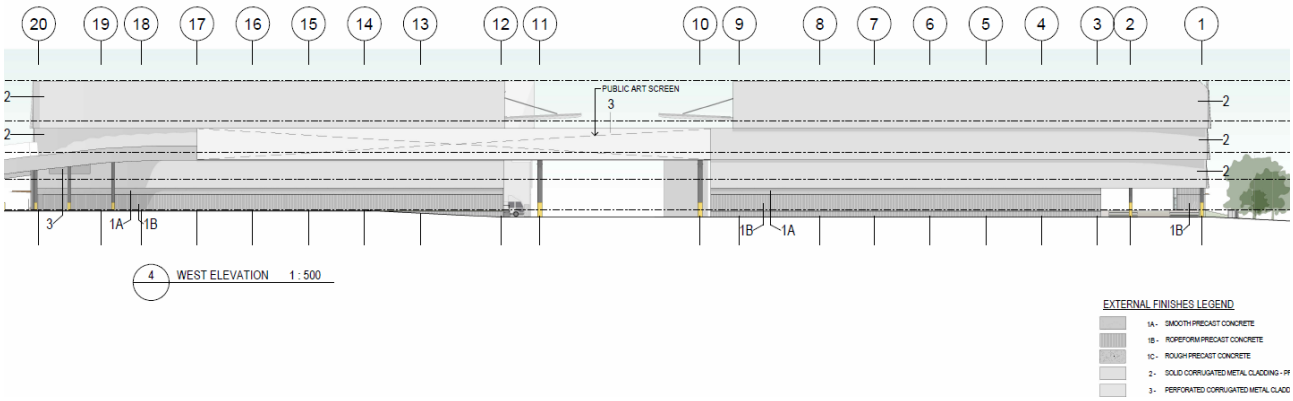
The amended proposal identifies two key opportunities for public art, incorporated as a screen along the western truck access ramp with high visibility from the St Peters Interchange, and in the undercroft entry area along Canal Road. Additional public art elements may also be developed in other areas of the site to contribute to the experience for users and passers-by.

The public art will be designed and manufactured in accordance with the Public Art Strategy and will comply with the relevant Australian Standards for light spill. An Art Strategy providing the "curatorial vision" for the public art has been prepared by Cultural Capital and is provided within the Design Report at **Appendix H**.

The concept of 'rhythms of change' forms the curatorial vision for the site. This encompasses both the First Nations experience of seasonality and natural rhythms, as well as the metropolitan context of the site as a nexus of urban activity. Artists will be invited to consider the historical, environmental, cultural and emotional patterns of change in this dynamic area and the experience of the site. The public artwork development and delivery will embed a mentoring opportunity for an emerging First Nations artist. This will build capacity of local First Nations artists and storytellers and demonstrates the deep commitment to Connection to Country in collaboration with Yerrabingin.

It is anticipated that a condition of consent will be included requiring a final Public Art Strategy / Plan be prepared prior to issue of the relevant construction certificate.

Figure 10 Location of the public art screen



Source: Architectural Plans

3.2.2.5. Signage

The amended design maintains a similar approach to wayfinding and signage as the previous proposal. The adaptations in the design of the facades at the northern and southern building elevations assist in signifying the office locations and the main pedestrian entries.

Truck ramp locations are clearly visible from Burrows Road with clear wayfinding signage located adjacent to the truck entries.

Business and building identification signage is proposed in the form of pylon wayfinding signage and integrated façade signage. The following signage is proposed:

- 2 x business identification sky signs (illuminated) (refer to **Figure 11**)
    - Dimensions: 3000mm by 3000mm.
    - Materiality: Fabricated aluminium sign case with backlit PVC 'Flexface' cantilevered 'bracket' behind a fabricated backlit logo with acrylic front faced with coloured film.
    - Location: The business identification signs are to be affixed to the western and southern facades. The signs are highly visible from the nearby ramps. One sign will be positioned near the top of the building

cladding on Burrows Road near the Canal Road corner and one is located on the south facade facing Canal Road.

- Site building ID plinth sign (illuminated) (refer to **Figure 11**)
  - Dimensions: 5600mm by 800mm.
  - Materiality: Concrete plinth with aluminium fascia and text from opal acrylic.
  - Location: Southern corner of site (corner of Burrows Road and Canal Road), within landscaped zone.
- 3 x minor gate building ID sign (illuminated) (refer to **Figure 11**)
  - Dimensions: 3200mm by 800mm.
  - Materiality: Concrete plinth with aluminium fascia and text from opal acrylic.
  - Location: Southern heavy vehicle entry and south eastern access points to the employee car park and to the ramp to level 1.

Figure 11 Proposed Signage

Picture 17 Sky Signs

Source: *Welsh + Major*

Picture 18 Site ID Sign

Source: Welsh + Major

Picture 19 Minor Gate ID Sign

Source: Welsh + Major

3.2.3. Uses and Activities

3.2.3.1. Site Preparation and Earthworks

All existing buildings and most hardstand areas onsite will be demolished as part of the proposed development as outlined on the Demolition Plan ('SSDA-101').

In addition, the removal of 19 trees on the site and 6 trees on surrounding land is required for the proposal. Of the 6 trees to be removed from adjacent land, 4 are located within the nature strip and are presumed to be under the care, control and management of City of Sydney Council.

Prior to construction of the built form, the following site preparation works will be undertaken as identified in the Civil Report and Plans prepared by Costin Roe:

- Bulk Earthworks – bulk earthworks will be undertaken to conform the site down to the appropriate pad levels to enable the proposed warehouse, office and under croft carparking (RL4.7m). The earthworks are estimated to involve approximately 3,930m^3 of cut, 24,450m^3 of fill and removal of 6,920m^3 of soil.
- Retaining Walls – Retaining wall infrastructure will be required along the northern site boundary. The walls are proposed to be of top-down post and whaler construction, with a maximum height of 1m to minimise impacts to neighbouring developments.
- Embankment Stability – Permanent batters will be required in clay areas and will be no steeper than 3 horizontal to 1 vertical. Permanent batters will also be adequately vegetated or turfed which will assist in maintaining embankment stability.
- Groundwater – Groundwater was identified at depths between 1.6m and 4.0m below ground level. As there is limited excavation required for the development and the site is currently fully developed, impact groundwater systems is considered negligible. Surface water management, including conveyance of surface runoff, management of water quantity (through on-site detention) and water quantity (through on-site management systems using WSUD principles and best practice pollution reduction objectives) has been proposed in the design.
- Acid Sulphate Soils & Salinity – The soils onsite have been identified as slightly to moderately saline sands. A Salinity Management Plan and a Soil Management Plan have been prepared by PSM Consult.

3.2.3.2. Remediation

Remediation of the site will be undertaken in accordance with the site's Remedial Action Plan (**RAP**) prepared by AECOM. The remediation approach involves capping the site with imported material following the proposed cut and fill earthworks to achieve the required design levels. A marker layer comprising geofabric and plastic mesh is to be placed over the fill. The capping layer is to comprise imported material or concrete hardstand with a minimum thickness of 0.5 m.

It is noted that further investigations regarding the leachability of contaminants from fill material and assessment of landfill gas will be undertaken prior to the commencement of any works. A revised or addendum RAP will be prepared if there are any changes to the remedial strategy.

3.2.3.3. Operations

The proposed development is for a warehouse and distribution centre with ancillary office space. All warehouse and office facilities onsite are anticipated to operate 24 hours per day, 7 days per week, with onsite activities including:

- Handling of goods and materials for storage and distribution, including loading and unloading.
- Heavy rigid vehicle movements and car parking, including arrival and departure of employees.
- Office operations to support the warehouse and distribution centre, including EOTF provisions.

Warehouse

Trucks will enter the site from two entry points along Burrows Road. Trucks accessing the ground floor of the warehouse will enter the site through the centrally located access driveway, whilst trucks accessing the first floor warehouse area will enter from the eastern access driveway and proceed up the ramp.

The proposed warehouse tenancies are set across two levels with 14,345m^2 and 15,924m^2 of warehouse GFA on each level, connected to the spines by a central covered hardstand area which accommodates the set down, unloading, and safe entry / exit of delivery vehicles.

The ground floor warehouses are designed with a recessed dock face at the central hardstand to facilitate loading/unloading and allow for secure storage of containers for customs clearance.

The ground floor hardstand is a breezeway, fully open at each end to allow for natural ventilation. The upper floor hardstand area is open to sky with 2 awnings over the dock face itself for weather protection. The ground floor southern warehouse is set back beyond a under croft carpark area on the Canal Road frontage. The provides carparking for the whole of the southern warehouse block. The upper level carpark projects over this on the first floor.

Pedestrian safety is guaranteed by providing dedicated pedestrian access to the warehouses via the southern car park and from the northern lobby. A safe pedestrian crossing point is provided across the northern end of the breezeway.

Warehouse units have options for shared and joint facilities. Each warehouse unit will have a dedicated in-tenancy waste storage area and services rises in the base building to provide options for future in-tenancy amenities. In addition, driver amenities are provided within each tenancy. The configuration of the warehouse tenancy layout has been designed to allow for future flexibility in how these spaces are utilised by future prospective tenants (i.e. some tenants may require smaller tenancies and others may require larger combined tenancies).

Office / Amenities

Servicing these warehouse facilities are ancillary offices that are located at two mezzanine levels above the ground and first floor warehouses. The location of the offices correlates with the corresponding warehouse tenancies, enabling a degree of connectivity both physically and visually to the warehouses to improve operations and promote an integrated workplace culture. Floorplates have been designed to be flexible and reconfigurable to suit the needs of future tenants.

Additionally, landscaped terraces have been provided at each office space, improving the greening of the site and enhancing user wellbeing. EOT facilities have also been provided at the southern and northern aspects of the ground floor. The facilities will be available on a 24/7 basis, consistent with the primary warehouse and distribution use.

The northern and southern offices are serviced by separate lifts and stairway to ensure efficient pedestrian connectivity to the office areas.

3.2.3.4. Stormwater Management

Stormwater runoff will be collected by the proposed stormwater management system and directed through several pollution treatment devices, discharged at the two discharge points along Burrows Road as outlined in the Civil Engineering Drawings and Report.

3.2.3.5. Transport and Parking

Construction

Access to the site during the construction phase will take place via the existing crossovers on Burrows Road. The shortest routes between local and regional road networks will be promoted to minimise impacts of construction. All works will be undertaken within the standard construction hours, any hours to be undertaken outside this period will require an Out of Hours (**OOH**) approval at the appropriate time.

Operation

On Burrows Road, the site proposes 3 vehicular crossovers:

- A single car park access to the undercroft car park (light vehicle in and out movements).
- A crossover that accommodates separate truck entry and exit movements, with the entry portion also serving as an entry driveway for the drop-off area (truck and light vehicle in, truck out movements).
- A separate vehicular crossover for the drop-off area egress (light vehicle out movements only).

Further, the site provides an ingress only access driveway for fire brigade access off Canal Road.

3.2.4. Development Timing

3.2.4.1. Construction Staging and Phases

The development is proposed to be carried out in one stage. However, the proposal will be carried out in five Construction Certificate (**CC**) phases as listed below:

- CC1 – Demolition, site works, and earthworks;
- CC2 – In-ground and structure works;
- CC3 – Façade, services and fit out works;
- CC4 – Landscape and external works; and
- CC5 – Public domain related works

The applicant requests that the SSD conditions of consent be tailored to reference the relevant CC when drafting conditions of consent ie. Include wording that conditions to be satisfied prior to the specific CC stage or “the relevant construction certificate”. This will reduce programme inefficiency with all CC conditions required to be satisfied prior to the first CC.

The overall construction programme will be approximately 18 months.

4. STATUTORY CONTEXT

4.1. STATUTORY REQUIREMENTS

The table below categorises and summarises the relevant requirements in accordance with the Departments *State Significant Development Guidelines*. A detailed statutory compliance table for the proposed development is provided at **Appendix C**.

Table 6 Identification of Statutory Requirements for the Project

Statutory Relevance	**Action**
Power to grant approval	In accordance with clause 12 of Schedule 1 of the *State Environmental Planning Policy (Planning Systems) 2021* (**Planning Systems SEPP**), development with an estimated development cost of greater than $30 million that is for the purpose of a warehouse and distribution centre, at one location and related to the same operation, is classified as SSD: ***12 Warehouses or distribution centres*** *(1) Development that has a capital investment value of more than the relevant amount for the purpose of warehouse or distribution centres (including container storage facilities) at one location and related to the same operation* *(2) This clause does not apply to development for the purposes of warehouses or distribution centres to which clause 18 or clause 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 relevant amount in this case is $30 million as the SEARs were issued prior to 1 June 2023. The proposed works have an estimated EDC in excess of $30 million (excl. GST) and are for the purposes of a multi-level warehouse and distribution facility. Accordingly, the proposal is SSD for the purposes of the Planning Systems SEPP.
Permissibility	The site is zoned E4 General Industrial in accordance with the *Sydney Local Environmental Plan 2012* (**SLEP 2012**). The proposed development constitutes a 'warehouse or distribution centre', which is 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.*

Statutory Relevance	Action
	The proposal comprises a warehouse and distribution centre (34,051sqm) which is permitted with consent in the E4 Zone. The proposal also includes 3,353sqm of office space ancillary to the main warehouse operations. Planning Circular PS 21-008 ('How to characterise development') outlines that an ancillary use is a use that is subordinate or subservient to the dominant purpose on the land. Therefore, the office component is permitted by virtue of being ancillary to the warehouse and distribution centre as the primary land use.
Other approvals	***Water Management Act 2000*** Pursuant to section 4.41 of the EP&A Act, SSD is exempt from requirements for a water use approval (section 89), a water management work approval (section 90) or an activity approval (other than an aquifer interference approval) (section 91) of the Water Management Act 2000. The Geotechnical / Soil Salinity Investigations undertaken by PSM and the earthworks proposed by Costin Roe would be to a maximum depth of RL 2-2.3, which would not impact upon the groundwater levels which range between RL -1.8 to 0.8m.
	Roads Act 1993 Section 138 of the *Roads Act 1993* requires the consent of the relevant Road Authority for work in, on, under or over a public road. The proposal includes new driveway crossings off Burrows Road for vehicular entry to the site and access for the fire brigade off Canal Road. Burrows Road is a local road, therefore Council is the Road's Authority. Canal Road is a regional / State Road, therefore the consent authority is TfNSW. Approval is therefore sought under section 138 of the Roads Act for the proposed driveway crossings.
	National Parks and Wildlife Act 1974 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. Pursuant to 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. An Aboriginal Cultural Heritage Assessment Report (**ACHAR**) has been prepared by Artefact to assess the site's sensitivity and consider any potential impacts associated with the proposed development. The report found that the study area was assessed as having nil-low archaeological potential to retain intact archaeological deposits that may contain Aboriginal objects. Therefore, no further archaeological investigation is recommended.

Statutory Relevance	Action
	Biodiversity Conservation Act 2016 Clause 7.9 of the BC Act 2016 applies to SSD applications and requires SSD applications to be accompanied by a BDAR unless it is determined the proposal is not likely to have any significant impact on biodiversity values. Accordingly, a BDAR Waiver application has been prepared to request the requirement to submit a BDAR is waived under clause 7.9(2) of the *Biodiversity Conservation Act 2016*. This request will be submitted to DPHI on the 20 December 2024. .

4.2. PRE-CONDITIONS

Table 7 outlines the pre-conditions to exercising the power to grant approval which are relevant to the project and the section where these matters are addressed within the EIS.

Table 7 Pre-Conditions

Statutory Reference	Pre-condition	Relevance	Section in AR
State Environmental Planning Policy (Transport and Infrastructure) 2021 (**Transport and Infrastructure SEPP**)			
Section 2.119 – Development with frontage to classified road	A consent authority must not provide development consent on land fronting a classified road unless it is demonstrated that access, safety, and efficiency of the development will not impact this classified road and the type of development is not sensitive to traffic noise or vehicle emissions.	Primary access to the site is via Burrow Roads, not the classified Canal Road, with access, pedestrian and vehicular safety, as well as the efficiency of truck movements designed to minimise impact to the classified road frontage. A single crossover from Canal Road is proposed for the purpose of fire services and some utilities access to the site. This crossing would only be used by Fire & Rescue NSW in an emergency situation and as such would not impact traffic movements on Canal Road. Given the site is a warehouse and distribution use, the development will not be affected by traffic noise or vehicle emissions.	**Section 6 and Appendix O**

Statutory Reference	Pre-condition	Relevance	Section in AR
Section 2.122 – Traffic-generating development	A public authority, or a person acting on behalf of a public authority, must not approve traffic-generating development without written notice of the intention to carry out the development to TfNSW in relation to the development, and taken into consideration any response to the notice that is received from TfNSW within 21 days after the notice is given.	The site has access to Canal Road, a classified road, and a site area of 34,614m^2, greater than the nominated 5,000m^2. The proposed development is therefore considered traffic-generating under SEPP Transport and Infrastructure. The application will be referred to TfNSW and will take into consideration matters listed in their response.	**Section 6 and Appendix O**
Stat Environmental Planning Policy (Resilience and Hazard) 2021 (**Resilience and Hazard SEPP**)			
Section 2.10 – Development on land within the coastal environment area	Given the site is within a coastal environment area, the consent authority must not provide consent unless it has considered whether the proposal will have an adverse impact on the quality, resilience, or biodiversity elements present in the zone.	A small portion of the eastern part of the site is within the coastal environment area. The proposed development is not likely to cause an adverse on the outlined coastal elements. As confirmed in the Civil Report, the proposed development will utilise sediment basins, sediment fences, and stabilised site accesses to limit risk of sediment adversely impacting the Alexandra Canal. During operation, any stormwater will either be treated or harvested for re-use onsite, incorporating principles of WSUD to mitigate any potential stormwater impacts on surrounding waterways.	**Section 6, Appendix C and Appendix Z, Appendix AA, Appendix BB**
Section 2.11 – Development on land within the coastal use area	The consent authority should not provide development consent unless satisfied the proposed development has considered the likelihood to cause an adverse impact on the	A small portion of the eastern part of the site is within the coastal use area. The proposed development is not likely to cause an	**Section 6, Appendix C and Appendix Z, Appendix**

Statutory Reference	Pre-condition	Relevance	Section in AR
	amenity and access to foreshore and coastal areas, and is satisfied that if any impacts are present, sufficient mitigation measures are in place to manage them.	adverse on the outlined coastal elements.	**AA, Appendix BB**
Section 4.6 – Contamination and remediation to be considered in determining development application	A consent authority must be satisfied that the land is suitable in its contaminated state – or will be suitable, after remediation – for the purpose for which the development is proposed to be carried out.	Potential sources of contamination exist at the site but are not expected to preclude the proposed development of the site. The Phase I & II ESA with subsequent SAS confirm that the site can be made suitable for a commercial/industrial development provided the recommendations of the AECOM RAP are implemented. The project's contamination consultant and site auditor have confirmed that the proposed remediation strategy remains suitable for the two level scheme in the letters attached as **Appendix Z** and Error! Reference source not found.**.**	**Section 6, Appendix C and Appendix Z, Appendix AA, Appendix BB**
State Environmental Planning Policy (Industry and Employment) 2021 (**Industry and Employment SEPP**)			
Section 3.6 – Granting of consent to signage	*A consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied—* *(a) that the signage is consistent with the objectives of this Chapter as set out in section 3.1(1)(a), and* *(b) that the signage the subject of the application satisfies the assessment criteria specified in Schedule 5.*	The proposed signage is appropriate and consistent with the objectives and requirements of Section 3.6 and Schedule 5 of *State Environmental Planning Policy (Industry and Employment) 2021*.	**Section 3, Section 6 Appendix C & Appendix B**
State Environmental Planning Policy (Sustainable Buildings) 2022 **(Sustainable Buildings SEPP)**			

Statutory Reference	Pre-condition	Relevance	Section in AR
Chapter 3 Standards for non-residential development	The Sustainable Buildings SEPP applies to non-residential development that involves – (a) the erection of a new building, if the development has an estimated development cost of $5 million or more, or (b) alterations, enlargement or extension of an existing building, if the development has an estimated development cost of $10 million or more.	The proposal is a new industrial development with a development cost of more than $5 million. However as per Section 4.2(1)(a) of the Sustainable Buildings SEPP, the policy does not apply to a development applications submitted on the NSW planning portal but not finally determined before the 1 October 2023. SSD-35962232 was submitted in November 2022 therefore the savings provisions of Section 4.1(1)(a) apply.	**Appendix C**

4.3. MANDATORY CONSIDERATIONS

Table 8 outlines the relevant mandatory considerations to exercising the power to grant approval and the section where these matters are addressed within the EIS.

Table 8 Mandatory Considerations

Statutory Reference	Mandatory Consideration	Section in AR
Consideration under the EP&A Act and Regulations		
Section 1.3	Relevant objects of the EP&A Act	**Throughout AR and Appendix C**
	Relevant environmental planning instruments:	
	▪ Planning Systems SEPP	**Section 1, Appendix C and Appendix F**
	▪ Resilience and Hazards SEPP	**Section 6, Appendix C and Appendix Z, Appendix AA, Appendix BB**
	▪ Transport and Infrastructure SEPP	**Section 6 and Appendix O**
	▪ Biodiversity and Conservation SEPP	**Section 6 and Appendix S**
Section 4.15	▪ Sydney Local Environmental Plan 2012 (**SLEP 2012**).	**Appendix C**

	Relevant draft environmental planning instruments: N/A	**N/A**
	Development control plans: Sydney Development Control Plan 2012 (**SDCP 2012**)	**Appendix C**
	Relevant planning agreement or draft planning agreement: N/A	**N/A**
	The Regulations No relevant provisions applicable	**N/A**
	The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.	**Section 6**
	The suitability of the site for the development	**Section 2 & Section 7**
	The public interest	**Section 7**
Mandatory relevant considerations under EPIs		
Resilience and Hazards SEPP	Chapter 4 requires a consent authority to be satisfied prior to granting consent that land requiring remediation can be made suitable for the purpose of the proposed development.	**Section 6, Appendix C and Appendix Z, Appendix AA, Appendix BB**
Transport and Infrastructure SEPP	Part 2.3, Division 17 'Roads and Traffic', Subdivision 2 'Development in or adjacent to road corridors and road reservations', clause 2.119 applies to development with a frontage to a classified road. The site has a boundary to Canal Road which is a classified road.	**Section 6 and Appendix O**
	The proposed development constitutes traffic-generating development in accordance with clause 2.121 and Schedule 3 of the SEPP. Provided the site has a total site area of 34,614m2 and the development has a total GFA of 34,051m2, the proposed development is considered a 'traffic generating development under Chapter 2 of SEPP Transport and Infrastructure.	**Section 6 and Appendix O**
Sydney LEP 2012	Objectives and land uses for E4 General Industrial Zone in conjunction with: Part 4 – Principal development standards	**Appendix C**

	Part 5 – Miscellaneous provisions Part 6 – Local Provisions (clause 6.57 1-3 Burrows Road, St Peters) Part 7 – Additional local provisions	
Considerations under other legislation		
Biodiversity Conservation Act 2016 (BC Act) – section 7.14	The likely impact of the proposed development on biodiversity values was assessed in the Biodiversity Development Assessment Report (**BDAR**) Waiver Request. The BDAR Waiver Request was submitted to DPHI on the 20 December 2024 and is to be referred to the Department of Climate Change, Energy, the Environment and Water, Given that a BDAR waiver was granted for the original 3-level scheme, it is expected that the BDAR waiver request will be accepted for the amended scheme given that the proposed tree removal has reduced.	**Section 6 and Appendix S**
Development Control Plans		
Sydney Development Control Plan 2012 (**SDCP**)	Clause 2.10 of the Planning Systems SEPP states that development control plans (whether made before or after the commencement of this Policy) do not apply to SSD. As such, there is no requirement for assessment of the proposal against the SDCP 2012 for this SSDA. Notwithstanding this, consideration has been given to the following provisions: **Section 2** – Locality Statements **Section 5** – Specific Areas 5.8 – Southern Employment Lands **Section 6** – Specific Sites 6.3.19 – 1-3 Burrows Road, St Peters	**Appendix C**
Development Contributions Plan		
City of Sydney Development Contributions Plan 2015	A section 7.11 contribution rate of $5,735 (at September 2024) per additional worker within the Southern Employment Lands, indexed at the time of payment is applicable.	**Appendix C**

5. COMMUNITY ENGAGEMENT

The following sections of the report describe the engagement activities that have been undertaken during the preparation of the EIS and ADR and the community engagement which will be carried out if the project is approved.

5.1. COMMUNITY ENGAGEMENT UNDERTAKEN PRIOR TO LODGEMENT OF THE SSDA

Community engagement was undertaken by the project team prior to the lodgement of the original SSDA. This engagement was consistent with the community participation objectives in the Undertaking Engagement Guidelines for State Significant Development and followed the community engagement requirements within the SEARs.

Community and stakeholder engagement has been undertaken by the Project Team in the preparation of the SSDA. This included direct engagement and consultation with:

- Government Authorities
    - City of Sydney Council
    - Bayside Council
    - Inner West Council
    - Department of Planning and Environment, specifically:
        - Planning and Assessment Group
- Service Providers
    - Transport for NSW
    - Water NSW
    - NSW Environment Protection Authority
- Impacted Communities
    - Surrounding Landowners and occupiers, including:
        - Owner of and tenants at 2A, 4, 6, and 8-10 Burrows Road
        - Tenants of existing Goodman property at 9 Canal Road

The following actions were taken to inform the community regarding the project and seek feedback regarding the proposal:

- **Stakeholder briefings**: the applicant provided stakeholder briefings to City of Sydney Council throughout the design and SSDA process.
- **Fact sheets**: Two fact sheets were prepared for this project. The first introduced the project and the design competition process (letterbox drop on 3 February 2022 to 122 local business premises). The second explained the SSDA process, provided an update on the design competition, and reminded stakeholders of project contact information (letter box drop on 19 August 2022 to 99 premises, of which 69 were businesses).
- **Engagement email and phone number**: No enquires have been received at the time of writing the EIS.

5.2. ENGAGEMENT CARRIED OUT PRIOR TO THE SUBMISSION OF THE AMENDMENT REPORT

Further engagement was undertaken prior to the submission of the ADR. This further engagement ensures that consistency with the Department of Planning, Housing and Infrastructure's (DPHI) *Undertaking Engagement Guidelines for State Significant Projects* is achieved and compliance with the engagement

requirements outlined in the SEARs have been maintained throughout design development. A summary of the additional engagement activities undertaken are outlined in the table below,

Table 9 Stakeholder Engagement Table

Stakeholder	Consultation Activity	Response
Government Authorities		
City of Sydney Council	Email from Urbis on 20 September 2024, to advise of a revision to the proposal, culminating in the reduction from a three-storey scheme to a two-storey scheme.	Council representative confirmed that the comments provided in 2022 were still applicable to the amended scheme.
Bayside Council	Email from Urbis on 24 September 2024, to advise of a revision to the proposal, culminating in the reduction from a three-storey scheme to a two-storey scheme.	Council representative advised that the matter would be passed on to a project officer for a review of the changes. A record of the detailed correspondence with Bayside Council has been provided within the appended Social Impact Assessment.
Inner West Council	Email from Urbis on 20 September 2024 to advise of a revision to the proposal, culminating in the reduction from a three-storey scheme to a two-storey scheme.	Council representative advised that the comments provided in 2022 were still applicable to the amended scheme, providing additional guidance around the opportunities to provide public art. A record of the detailed correspondence with Inner West Council has been provided within the appended Social Impact Assessment.
Service Providers		
State Emergency Services (SES)	At the request of DPHI, following receipt of advice regarding flood risks at the site, an email was sent to a representative of the SES on 16 September 2024.	SES advised that additional comments on the proposal would be provided by the SES subsequent to submission of the amended proposal to DPHI. Goodman will continue to consult with SES throughout the assessment of the EIS, Goodman will also respond accordingly to any future enquires received post lodgement.

5.3. ENGAGEMENT TO BE CARRIED OUT

Goodman welcomes feedback on the proposal. Goodman will continue to keep stakeholders and the community informed of the project approval process through the exhibition and determination phases by:

- Continuing to engage with the community about the project, its impacts, and the approval process
- Providing information on how the community's views have been addressed on the project website and through a letterbox drop
- Enabling the community to seek clarification about the project through the two-way communication channels.

6. ASSESSMENT OF IMPACTS

This section describes the way in which the key issues identified in the SEARs have been assessed for the amended development. It provides a comprehensive description of the specialist technical studies undertaken regarding the potential impacts of the proposed development and recommended mitigation, minimisation and management measures to avoid unacceptable impacts. Further detailed information is appended to the ADR, including:

- SEARs compliance table identifying where the SEARs have been addressed in the ADR (**Appendix A**).
- Statutory compliance table identifying where the relevant statutory requirements have been addressed (**Appendix C**).
- Proposed mitigation measures for the project which are additional to the measures built into the physical layout and design of the project (**Appendix D**).

The detailed technical reports and plans prepared by specialists and appended to the ADR are individually referenced within the following sections.

It is noted that no further consultation has been undertaken during the public exhibition and RtS phase of the SSDA.

6.1. DETAILED ASSESSMENT OF IMPACTS

6.1.1. Built Form, Design Quality and Urban Design

Competition winning architects Welsh and Major have prepared a Design Report which is provided at **Appendix H.**

The Design Report sets out the project vision, design quality objectives, the design excellence process and how it has been achieved, site analysis and how the proposed design approach responds to the site context and how the proposal addresses key statutory controls. The Design Report is accompanied by the Designing with Country Visual Design Report, Landscape Design Statement and the Public Art Strategy which have been prepared by the design team.

The amended design for the multi-level warehouse at 1-3 Burrows Road, St. Peters, is underpinned by a set of key principles that aim to balance the functional requirements of the development with a strong sense of place and integration with its context. The design emphasises the scale and purpose of the structure, celebrating its industrial typology while maintaining a consistent and cohesive expression of the built form. The approach focuses on simplicity in façade articulation and uniformity in edges to achieve a singular architectural language.

The amended scheme was reviewed by the DIP in March and August 2024. The DIP confirmed that the scheme presented on the 5 August 2024 was appropriate to proceed as an amended Development Application to the Department of Planning, Housing and Infrastructure. This is further discussed in **Section 6.1.1.2** below.

6.1.1.1. Existing Environment

The site is situated within the western extent of the Sydney LGA at the junction with Bayside and Inner West Council LGAs. The site is currently occupied by older low-rise industrial large format steel frame warehouse buildings. The buildings no longer meet the industrial requirements and contemporary needs of prospective tenants in the market.

The site is surrounded by existing industrial and commercial developments to the north-east, south-east and south-west. The Alexandra Canal is located approximately 100 metres to the south-east and east, and the St Peters WestConnex Interchange is located immediately to the north and west.

6.1.1.2. Potential Impacts

Design Excellence and Design Integrity

In accordance with Better Placed and clause 6.21 of SLEP 2012, Welsh and Major have demonstrated that the proposal achieves design excellence (refer to Design Report at **Appendix H**). As noted in Section 1.3.2 of the AR, the proposal has also been subject to an extensive Competitive Design Alternatives Process and a rigorous design integrity review process to ensure design excellence is achieved. The Design Integrity Panel were reassembled following the amendment of the design to a 2-level scheme in March and August of 2024. The following recommendations and/or concluding remarks from the DIP made on 5 August 2024 are noted:

- *The DIP acknowledged that further resolution and design development regarding the interlocking edges of the façade at the corner of Burrows and Canal Roads and the north-east corner of the site will naturally occur to ensure suitable constructability and waterproofing.*
- *The DIP noted that details such as graffiti management is something that can be considered during the operational phase of the project.*
- *The DIP acknowledged that capping detail of the sharp edge roof would be refined and resolved during further design development.*
- *The DIP endorsed the scheme presented during the session, concluding that the key design elements which informed the original Design Competition winning scheme are retained in a manner that is 'substantially the same'.*
- *The DIP confirmed that the scheme presented in this session was appropriate to support an amended Development Application to the Department of Planning Housing and infrastructure.*
- *The DIP agreed that there is no requirement for the proponent to present the scheme to the DIP again prior to amended DA lodgement. Should the Industry Assessments team require any direction on design matters arising during assessment, GANSW has the authority to provide this guidance on behalf of the DIP members.*

The amended design proposal maintains the intrinsic design approach of the previous competition winning design. Key elements of the building form and articulation are based around:

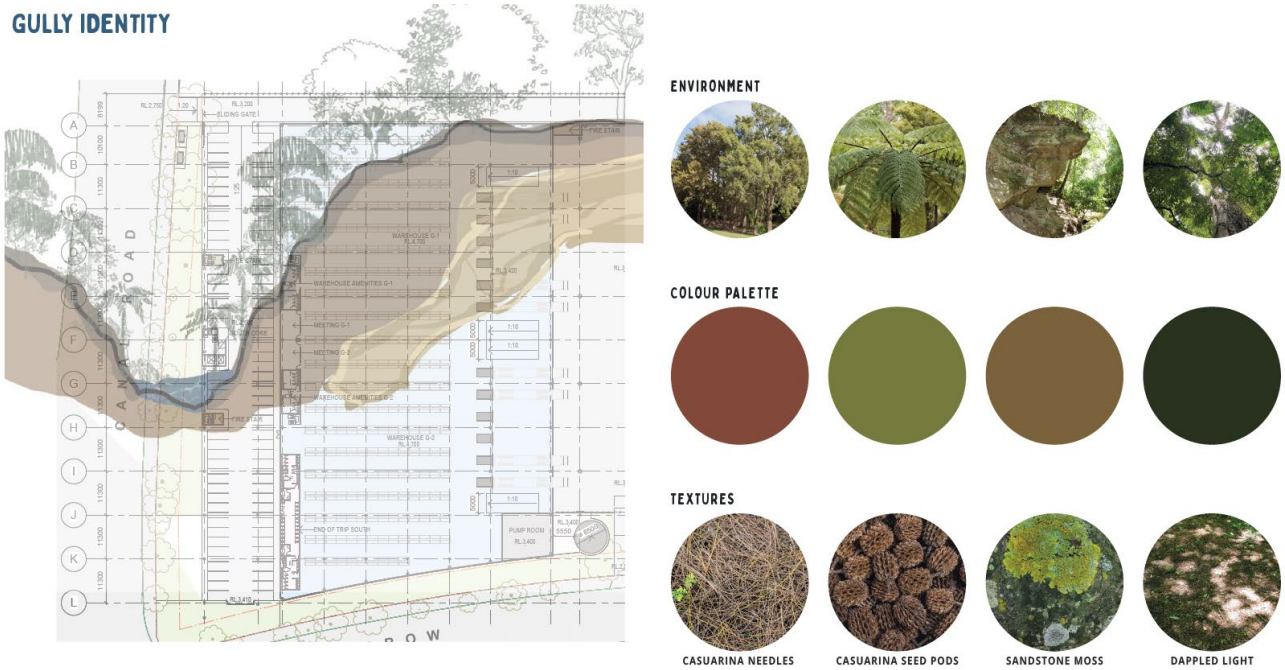
- The curved facade providing a response to the Canal + precolonial landscape
- The sweeping built form / façade along the Burrows Road frontage to providing a strong conceptual response to the context and scale of the site
- A singularity of expression
- A strong base to ground the form and articulate the scale
- Articulated facade and edges

As demonstrated above, all of the matters raised by the DIP as requiring retention and resolution have been addressed within the revised scheme or are committed to being resolved in the construction/ operational phases. Therefore, it is considered that the proposed development provides for a high level of design quality and will have a positive impact on the site, streetscape and broader locality.

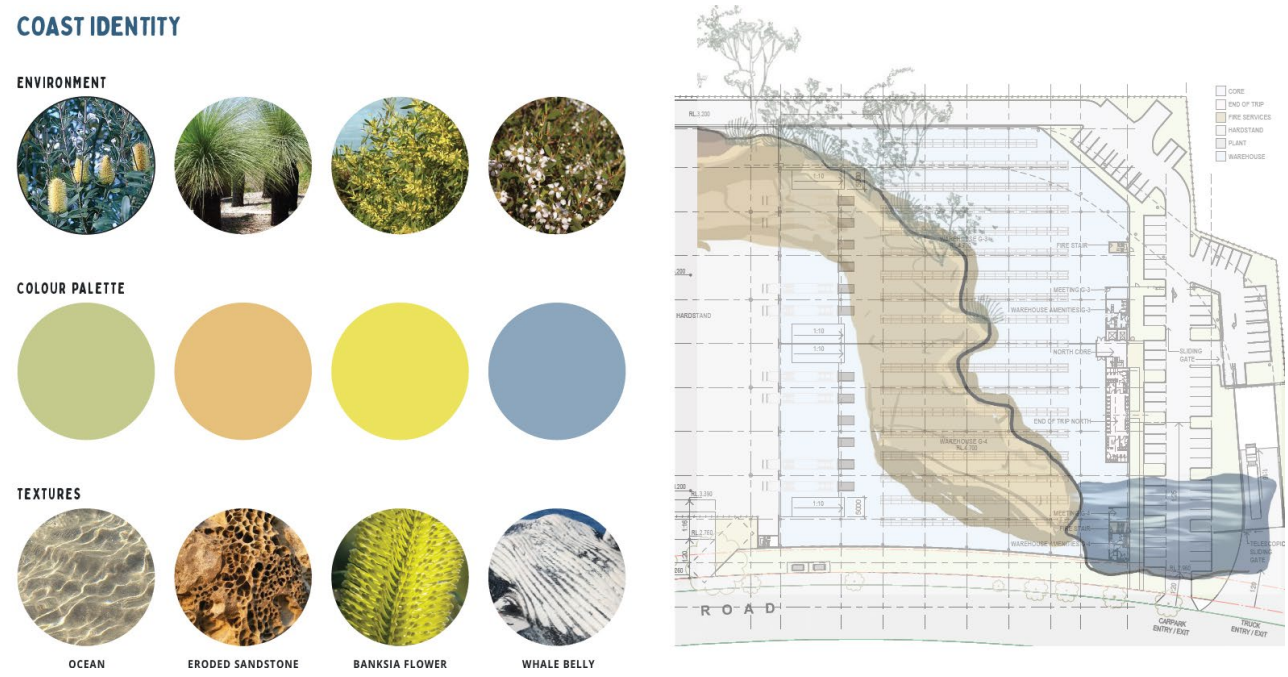
Connecting with Country

A central focus of the proposal is its connection to Country, developed in collaboration with First Nations groups and guided by the principles of the "Coast to Gully" narrative. This includes restoring aspects of the pre-colonial wetland landscape through curved building forms, reflective of the historical shoreline along Burrows Road, and extensive use of indigenous planting both around and within the building. The narrative also informs broader landscape and placemaking strategies, creating a meaningful connection to local heritage and embedding cultural storytelling into the site (**Figure 12**).

Figure 12 Connecting with Country Narrative Development



Picture 20 Gully Identity



Picture 21 Coast Identity

Source: Yerrabingin, Design Report

Layout and Design

Functionality is a key consideration in the layout and design of the warehouse and office spaces. The warehouses are configured across two levels to accommodate a range of tenant requirements, with flexibility to combine or adjust tenancies as needed. The ground floor features a recessed dock face to facilitate efficient loading and unloading operations, while the upper level includes hardstand areas with weather protection provided by awnings. The mezzanine offices are directly connected to the warehouse spaces, allowing seamless visual and physical interaction between the administrative and operational components of the site. This integration supports a cohesive workplace culture and ensures that the facilities meet the practical demands of modern industrial tenants.

The form and massing of the building are designed to respond to both its functional requirements and its context. The curved design of the building reflects the alignment of the historical canal and wetland, creating a visually cohesive form that ties the northern and southern warehouse blocks together. A central breezeway provides connectivity, while adjustments to the building's length have reduced its scale without compromising its visual impact. The integration of office spaces as mezzanines within the warehouse blocks ensures physical and operational connectivity, promoting a unified workplace environment.

The proposed design largely complies with the minimum 6m landscape setbacks. At the Northeast, Southeast and Southwest corners the architectural facade articulation feature of the flared corner detail overhangs the 6m setback to a maximum of 0.8m, occupying a total area of 8 sqm. Other than the above instance, the 6m setback is not overhung by any other building elements or above ground services.

The overhang is a result of the articulation of the façade only and the building envelope does not extrude into the setback zone. The interlocking edges of the façade of the development were seen as a key element of the design competition scheme and were supported for retention by the Jury. In the panel's review of the two-level scheme, the DIP endorsed the resolution of the corners and noted that they would be further developed through detailed design. Therefore, the interlocking corners are considered to contribute to the design excellence of the scheme. As the primary function of the setback zone, which is to provide landscaping will not be impacted, this minor variation is considered acceptable. Vehicle circulation is clearly delineated, with separate access points for trucks and light vehicles to ensure operational efficiency. End-of-trip facilities, including bicycle parking and change rooms, have been integrated to encourage sustainable transport options for workers and visitors.

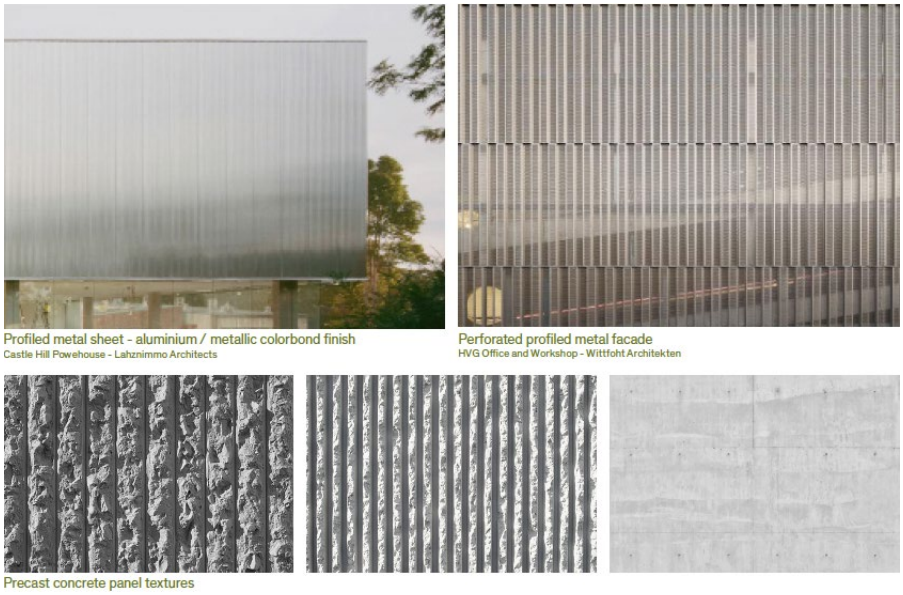
Placemaking is a fundamental aspect of the proposal, with landscaped setbacks along Burrows Road and Canal Road creating green buffers that provide outdoor amenity spaces and break-out areas. The public realm has been designed to enhance pedestrian accessibility, incorporating shaded seating areas and connections to the surrounding urban fabric. Public art is also integrated into the design, with opportunities identified along key façades to enrich the experience for users and passers-by.

Finally, the design of entry points and lobbies reflects the principles of the "Coast to Gully" narrative, creating distinct identities for the northern and southern entries. These spaces feature curated material palettes, garden terraces, and open façades, providing a welcoming and human-scaled experience for staff and

Materiality

Materiality and façade articulation have been carefully considered to ground the building in its industrial context while maintaining visual interest. The use of silvery corrugated metal panels and green precast concrete creates depth and texture, providing a sharp silhouette against the sky. Perforated façade elements introduce transparency and ventilation, while strategically designed edges enhance the building's linear expression.

Figure 13 Materiality – façade concept



Source: Welsh and Major

Sustainability

The proposal includes a robust sustainability strategy aimed at achieving a minimum 5-star Green Star rating. Key initiatives include the integration of photovoltaic panels, natural ventilation systems, and efficient lighting solutions to reduce energy consumption. Water management strategies, such as stormwater reuse for irrigation, are complemented by the use of endemic plant species to minimise irrigation needs. These measures are further supported by design choices that prioritise material efficiency, lifecycle sustainability, and waste reduction.

6.1.2. Visual Impact

A Visual Impact Assessment (VIA) has been prepared by Urbis to analyse the potential visual impacts of the proposed built form through a visual analysis of the development from key viewpoints within the public domain.

Urbis continually refines its VIA methodology so that it is appropriate for application across an urban visual context. The Urbis VIA methodology identifies objective 'visual baseline' information about the site and surrounds, analyses the extent of visual effects or quantum of change using visual aids from key locations, and considers the importance of that change.

The VIA considers likely future development and includes photomontages and perspectives showing the proposed development in its context.

6.1.2.1. Existing Environment

The existing visual context surrounding the site is as follows:

- **North**: The site's northern boundary is adjacent to the St Peter WestConnex Interchange and a temporary construction site for the M4-M5 Link. The interchange also includes shared paths through public parkland and a landscaped observation hill. Further north, are primarily single storey residential dwellings and the heritage-listed St Peters Anglican Church. Sydney Park, a large public space with distinct areas separated by knolls and mature vegetation, is also located in the north.
- **East**: To the east, the site is bordered by low-rise industrial and commercial buildings along Burrows Road. Further east, is the heritage listed Alexandra Canal and beyond the canal is B6 zoned land featuring a mix of industrial and commercial buildings with large, rectangular floorplates. Further east, are several blocks of new mid and high-rise mixed-use and residential buildings, with tree-lined streetscapes.
- **South**: South of the site is Sydney Kingsford Smith Airport, which contains large buildings and terminals. However, the airport's layout allows for long-distance views over the site from the surrounding road network due to the open runways.
- **West**: The site's western boundary is adjacent to Canal Road, a four-lane road connecting the Princes Highway with Alexandra Canal. Along Canal Road is the Goodman St Peters Business Park, a large area of low-rise general industrial land. Further north of the Business Park is the Maritime Container Services, an industrial processing and holding area for shipping containers, bounded by several low-rise industrial buildings along the Princes Highway.

6.1.2.2. Potential Impacts

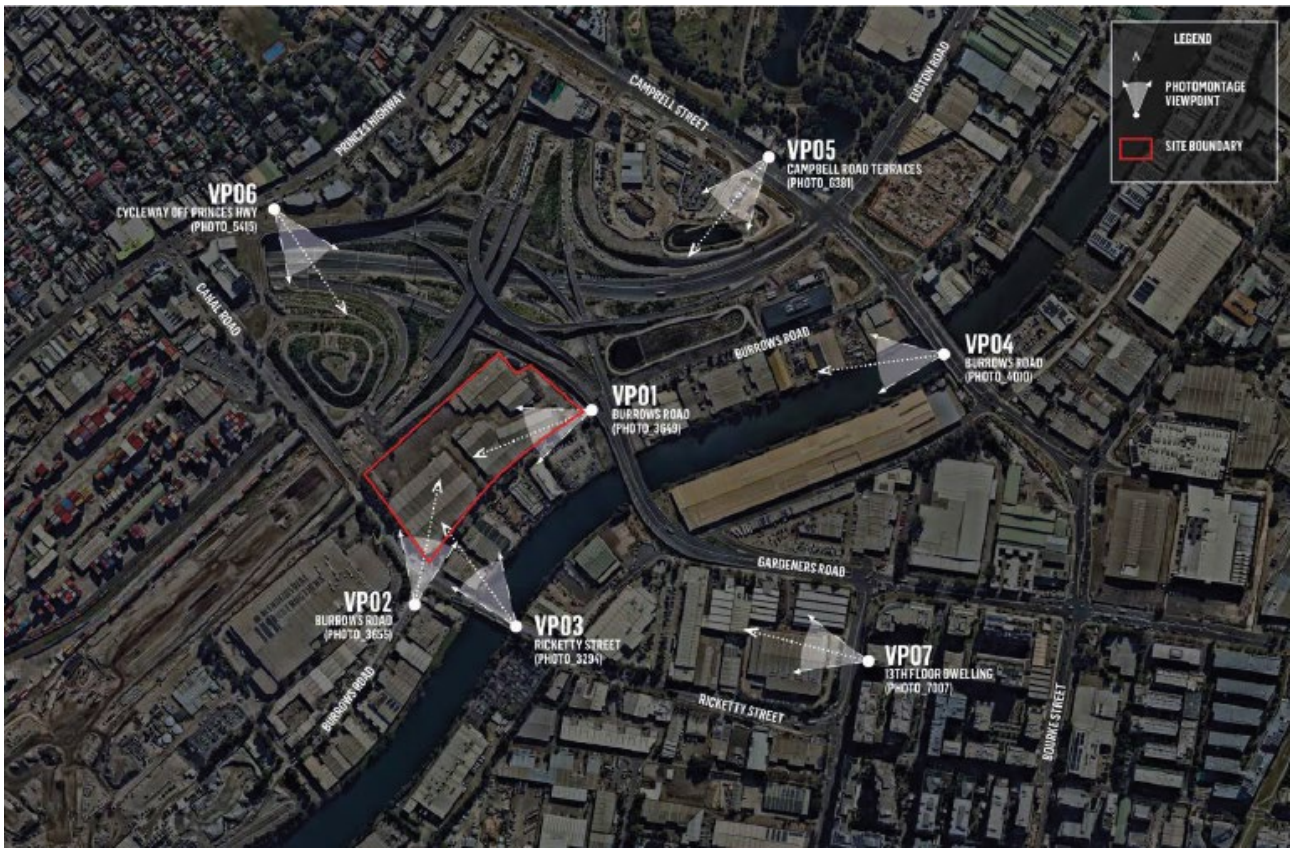
Prior to undertaking fieldwork, Urbis undertook a desktop review of all relevant statutory and non-statutory documents, an analysis of aerial imagery and topography and lidar data to establish the potential visual catchment to inform fieldwork inspections. The viewpoints were selected, taking into consideration feedback received during the post lodgement consultation phase with agencies and Councils. Following fieldwork Urbis selected and recommended 6 public view locations for further analysis, taking into consideration such matters as the view place sensitivity, visual absorption capacity and compatibility with urban features. One viewpoint from the 13th floor of the private residence at 12 Galloway Street was also undertaken.

The final viewpoints analysed were:

- View 01 - South-west view from Burrows Road
- View 02 - North-east view from Burrows Road South
- View 03 - North-west view from Ricketty Street

- View 04 - View west from Campbell Road Bridge
- View 05 - South-west view from Outside 31 Campbell Road
- View 06 - View from “near the centre (there is no music)” public art installation
- View 07 - Representative private view from 12 Galloway Street

Figure 14 Viewpoint location map



Source: Visual Impact Analysis Report

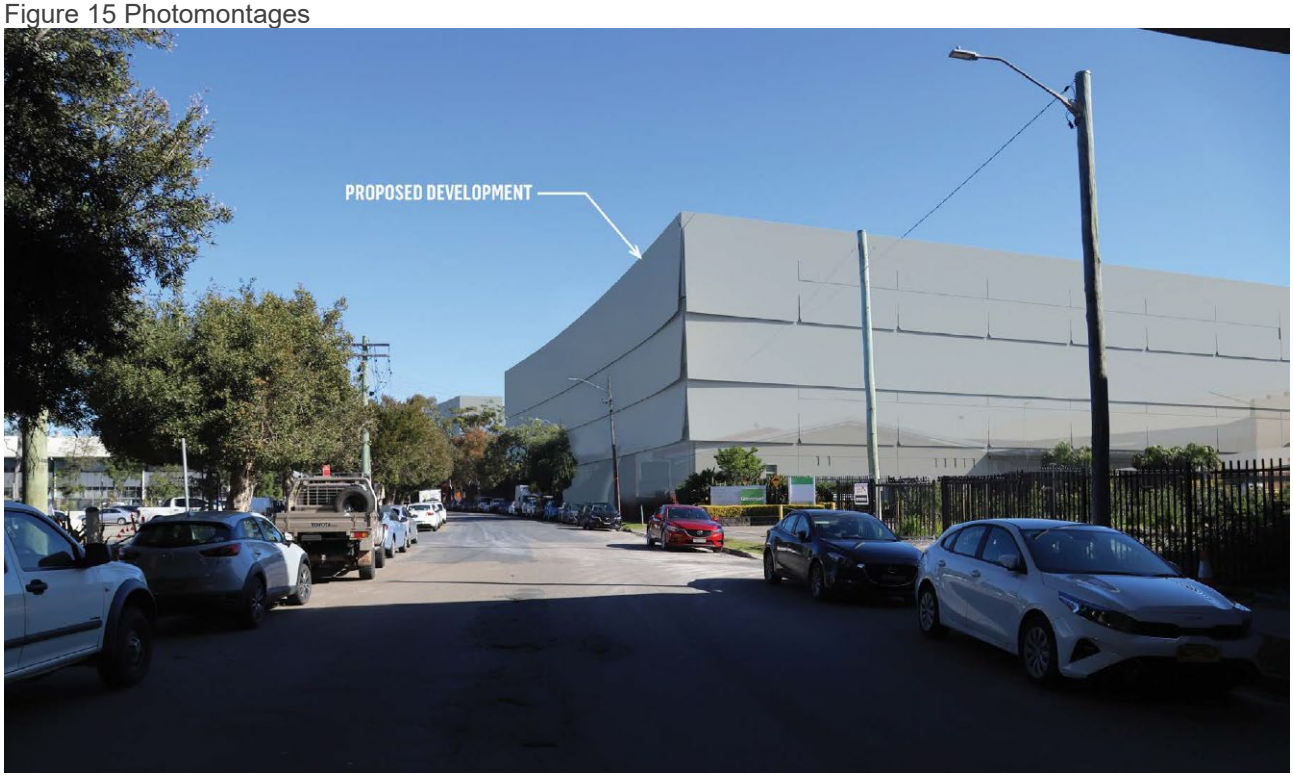
Analysis of the above seven viewpoints and associated photomontages from those viewpoints found that:

- The proposed development is surrounded by a mixture of infrastructure and commercial built form.
- The site will be most visible from the immediately surrounding streets including Burrows Road and Canal Road.
- Viewers within the immediate visual catchment will experience views predominantly from moving viewing situations and for short periods of time.
- For all 7 views modelled and assessed, visual impacts were rated as low.
- Retention of existing boundary vegetation where possible as well as proposed supplemental planting will filter sections of built form, particularly at the lower level of the proposed development.
- The proposed development does not block views to any scenic or highly valued features in the landscape, or heritage items and predominantly blocks areas of existing development or sky.
- While the proposed development is visible in close views, and greater in scale to others adjacent to it, the proposal is not dissimilar in form or character to others present within the immediate and wider visual context.
- Taking all relevant factors into consideration, the significance of visual effects that would be caused by the proposed development are reduced where visual impacts are rated as low.
- This SSDA can be supported on visual impact grounds.

On balance, when all relevant matters are considered, the visual effects and view impacts caused by the proposed development are considered to be reasonable and acceptable and as such the proposal can be supported on visual impact grounds.

The following photomontages demonstrate that the proposed development has an acceptable visual impact in the context of the site and its surrounds.

Figure 15 Photomontages



Picture 22 Photomontage from Viewpoint 02

Picture 23 Photomontage from Viewpoint 04

Picture 24 Photomontage from Viewpoint 06

Picture 25 Photomontage from Viewpoint 07

Source: ***Urbis***

6.1.3. Traffic, Transport and Accessibility

A Transport Management and Accessibility Plan, Green Travel Plan and Preliminary Construction Traffic Management Plan (CTMP) have been prepared by Ason Group to support the proposed development. These reports assess the anticipated traffic implications of the proposed development during the construction and operational stages.

6.1.3.1. Existing Environment

The site is situated within an established largely industrial area to the immediate south of the St Peters WestConnex Interchange and is well connected to Sydney Airport. The road network surrounding the Site includes a mix of state, regional and local roads. The surrounding road network comprises:

- Burrows Road, is a Regional/ Local Road that runs north-south and parallel to Princes Highway. In the vicinity of the Site, Burrows has a posted speed limit of 50km/h and carries 1 lane of through traffic, in addition to kerbside on-street parking, in each direction. Localised widening is provided at key intersections to facilitate necessary turning lanes.
- Campbell Road is a local Road oriented east-west and is located to the north of the Site. Campbell Road features 2 lanes in each direction. No on-street parking is permitted.
- Canal Road (becomes Ricketty Street south of the Site) is a State Road, oriented north-south, and is located to the southwest boundary of the Site. Canal Road has 2 lanes in each direction, increasing to 3 lanes at the intersection with Princes Highway. No on-street parking is permitted.
- Gardeners Road is classified as a State Road and is oriented east-west, forming the southern frontage of the Site. Gardeners Road has 3 lanes in each direction. No on-street parking is permitted.
- Princes Highway is classified as a State Road and is oriented north-south, intersecting with Canal Road and is situated north of the Site. There is a tidal flow arrangement at Princes Highway near Canal Road. In the AM peak, there are 4 lanes Eastbound and 2 lanes Westbound along Princes Highway. In the PM peak, there are 3 lanes Eastbound and 3 lanes Westbound. Princes Highway has 3 lanes in each direction. No on-street parking is permitted.

The site currently features two access points on Burrows Road and is well-serviced by public transport, aligning with strategies to promote walking and cycling. While there are no rail services immediately adjacent, Sydenham Station is 2 km to the west and Mascot Station is 1 km to the southeast. Bus services, including route 358 (Sydenham to Randwick) with 10-minute peak intervals, and routes 348 and 422 within 800 meters, provide connections to Wolli Creek and Kogarah. The site benefits from an extensive pedestrian network, including a 1.2 km walk from Mascot Station, footpaths on all adjacent streets, and multiple signalised pedestrian crossings at key intersections. There are also a number of recreational, sub-regional and local bicycle routes surrounding the site.

The existing site comprises existing warehouse developments with ancillary offices. The TIA assessed existing traffic volumes and performance at three key intersections around the site. The results, outlined in the figure below indicated that:

- Most intersections operate with acceptable delays (Level of Service (**LoS**) D or better) during peak times. However, the Gardeners Road/O'Riordan Street intersection experiences LoS E in the PM peak, and the Princes Highway/Campbell Road intersection faces LoS E in the AM peak.
- Out of 11 intersections, three—including Gardeners Road/O'Riordan Street, Princes Highway/Campbell Road, and Gardeners Road/Bourke Road (AM peak)—are operating close to capacity (Degree of Saturation (**DoS**) > 0.9), indicating potential for high delays and queuing without mitigation.
- The Gardeners Road/Bourke Road intersection generally performs well with LoS C in both peaks, though it is nearing LoS D. Specific issues include queue spillback from left-turning vehicles on the Northern approach.
- The Gardeners Road/O'Riordan Street intersection is close to capacity, with significant delays and congestion observed for the North and East approaches in the PM peak. Similarly, the Princes Highway/Campbell Road intersection faces capacity issues in both peak periods, with notable delays for the North and West approaches in the AM peak and the South approach in the PM peak.

Figure 16 SIDRA Model – Existing

Intersection	Control Type	Period	Degree of Saturation	Average Delay (sec)	Level of Service
Princes Highway / Canal Road	Signalised	AM	0.88	25	B
		PM	0.88	43	D
Burrows Road / Canal Road	Signalised	AM	0.70	13	A
		PM	0.62	13	A
Ricketty St / Kent Road	Signalised	AM	0.67	24	B
		PM	0.79	29	C
Gardeners Road / Kent Road	Signalised	AM	0.84	29	C
		PM	0.81	27	B
Gardeners Road / Bourke Road	Signalised	AM	0.92	41	C
		PM	0.84	40	C
Gardeners Road / O'Riordan St	Signalised	AM	0.94	44	D
		PM	0.98	58	E
Bourke Road / Campbell St	Signalised	AM	0.63	29	C
		PM	0.96	39	C
Campbell Road / Southend Access	Signalised	AM	0.28	4	A
		PM	0.37	6	A
Burrows Road / Campbell Road	Priority	AM	0.39	9	A
		PM	0.28	11	A
Princes Highway / Campbell Road	Signalised	AM	0.94	62	E
		PM	0.93	53	D

Source: Ason Group - TIA

6.1.3.2. Potential Impacts

Access

The proposed site access comprises the following (refer to the figure below for diagrammatic representation):

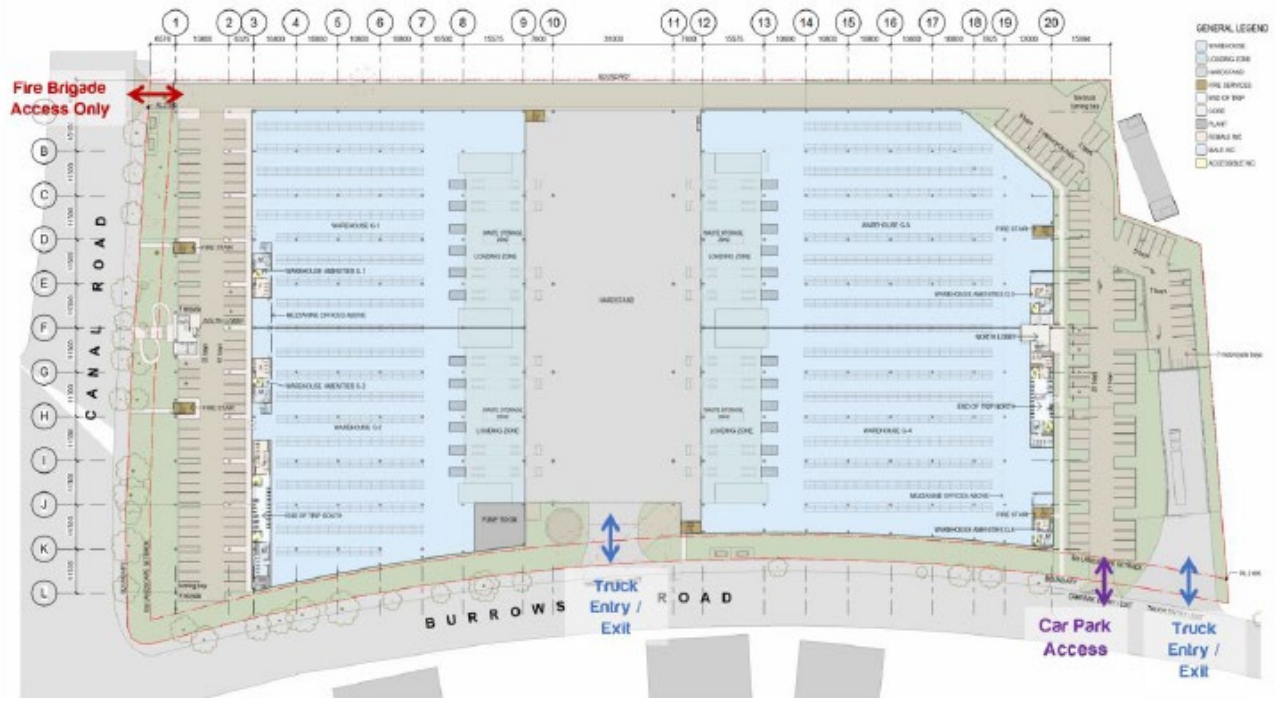
- Burrows Road
  - A car park access (light vehicle in and out movements).
  - Two crossovers that accommodate truck entry and exit movements (truck in and out movements).
- Canal Road
  - Entry and exit driveway designed for fire brigade (up to 12.5m in length)

The site access has been designed with reference to the following Australian Standards: AS2890.1:2004 for car parking areas, AS2890.2:2018 for commercial vehicle loading areas, AS2890.3:2015 for bicycle parking areas, and AS2890.6:2009 for accessible (disabled) parking. Additionally, access routes have been designed to support vehicles moving in a forward direction only.

Compliance with the above Standards would be expected to form a standard Condition of Consent further to approval.

The proposed internal roads, ramps, and warehouse hardstand area on each level of the development has been designed to accommodate access and circulation requirements for vehicles up to a 20m Articulated Vehicle.

Figure 17 Proposed Access Arrangements



Source: ***Ason Group - TIA***

Car Parking

Part 7.8 of the Sydney LEP outlines the maximum car parking rate for Industry, warehouse/ distribution centres and office/ business premises. These are outlined below.

Land Use	Maximum LEP Parking Rate	GFA (m^2)	Maximum Parking Permitted
Warehouse / Distribution Centres	If the building is on land in category F - 1 space for each 300m2 of GFA of the building used for those purposes.	30,698	102
Office / Business Premises	If the building is on land in category F and has a floor space ratio of no more than 1.5:1 - 1 space for each 75m2 of GFA of the building used for those purposes	3,353	45
Total			147

With a proposed warehouse GFA of 30,698m2 and a proposed office GFA of 3,353m2, this equates to a maximum allowable car parking provision of 147 spaces. The development proposes 145 spaces (inclusive of accessible spaces). This is within the allowable maximum and as such is consistent with the requirements outlined in the LEP. This provision excludes courier, and service vehicle spaces and is used as the basis for calculation of the required accessible and motorcycle spaces.

The City of Sydney Development Control Plan 2012 (DCP) outlines, in Section 7.8.5 of Schedule 7 Transport, parking and access, an accessible car parking provision of one space for every 20 car parking spaces or part thereof. With a car parking provision of 145 spaces, this equates to an accessible parking requirement of 8 accessible spaces. The proposed development provides 8 accessible spaces, thus meeting the minimum requirements outlined in the DCP.

Motorcycle/ Bicycle Parking

The DCP outlines in Schedule 7, Section 7.8.4, a requirement for 1 motorcycle parking space for every 12 car parking spaces. With a car parking provision of 145 spaces, this equates to a motorcycle parking requirement of 13 motorcycle spaces. The proposed development provides 14 motorcycle spaces, thus meeting the minimum requirements outlined in the DCP.

The DCP outlines, in Section 3.11.3, the following rates for bicycle parking:

- Office premises
  - 1 per 150m2 GFA for employees
  - 1 per 400m2 GFA for customers
- Industry or warehouse or distribution centre
  - 1 per 10 staff

Ason have been advised that 144 warehouse staff will be working on site. With a proposed office GFA of 3,353m^2 and an indicative 144 warehouse staff, this equates to a required bicycle parking provision of 47 spaces. The proposed development provides 66 bicycle spaces (of which 14 are to be horizontally stored), comprising 57 employee spaces and 9 visitor bicycle spaces, thus meeting the minimum requirements outlined in the DCP.

End of trip facilities have also been provided at the ground floor of the warehouse in accordance with DCP requirements. The DCP required the provision of 102 lockers and 6 shower and change cubicles which will be supplied.

Service and Loading Arrangements

The Development Control Plan (DCP) specifies in Schedule 7, Section 7.8.1, the following service vehicle parking rates:

- for commercial premises, 1 space per 3,300 sqm of Gross Floor Area (GFA) for the first 50,000 sqm
- industry, warehouse, and distribution centres, 1 space per 700 sqm of GFA.

With a proposed office GFA of 3,353 sqm and a proposed warehouse GFA of 30,698 sqm, the required service vehicle parking provision totals 46 spaces (2 for the office component and 44 for the warehouse component).

The proposed development includes 48 loading bays across two warehouse levels, designed for side loading operations, container setdown, and forklift operation.

This provision meets the intent of the DCP, considering the proposed loading arrangements, which are better facilitated through curtilage zones and adjacent roller shutter access rather than specifically marked individual bays.

All service areas have been designed to meet the relevant Australian Standards and to provide adequate space for the movement of articulated vehicles up to 20m. This will include a requirement to achieve a minimum 4.5 metre clear height for the access, circulation and hardstand areas in accordance with AS 2890.2:2018. The future operations and traffic management arrangement of the service / hardstand area shall be subject to an Operational Traffic Management Plan to allow for identification of tenants requirements and a customised traffic management arrangement specifically to support the operational needs of the tenants.

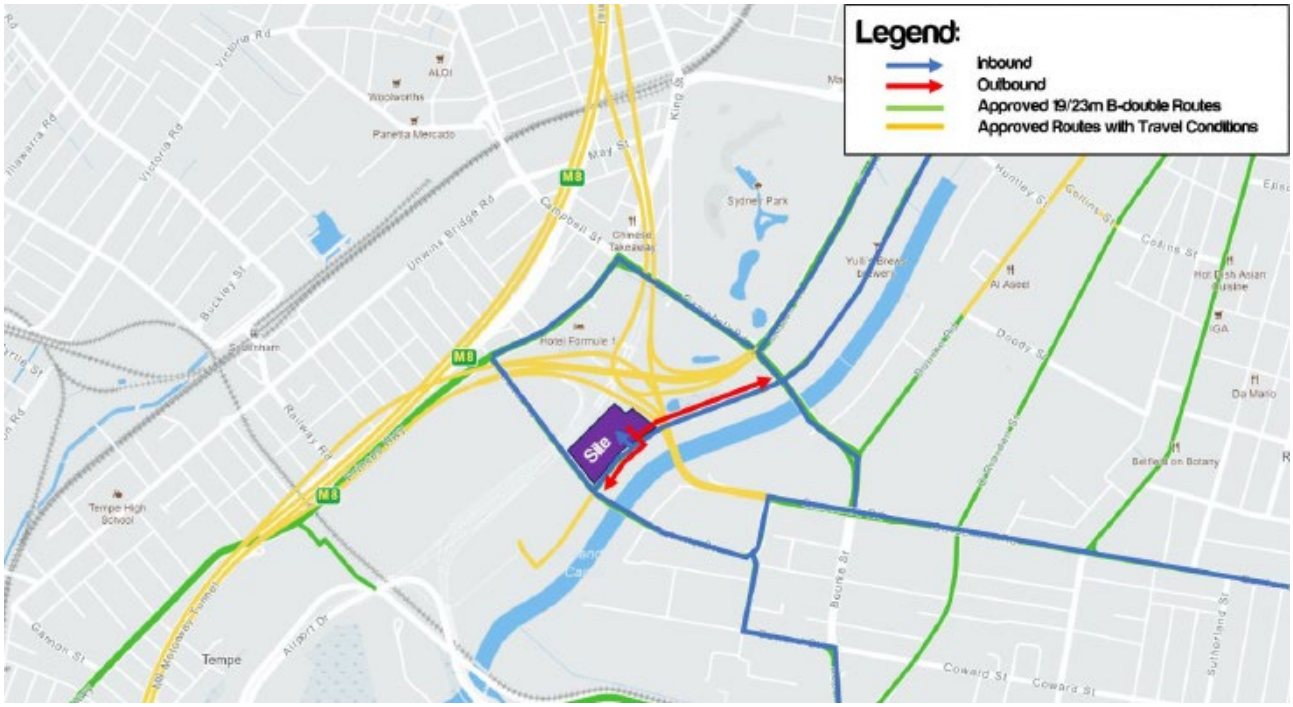
Construction Traffic Impacts

A Preliminary Construction Traffic & Pedestrian Management Plan (CTPMP) has been prepared in conjunction with the TIA. Construction Vehicle access is proposed to be provided to all construction vehicles via the existing crossovers on Burrows Road. The routes shown are to be utilised by all construction vehicles travelling to and from the site and represents the shortest route between the local and regional road network, minimising the impacts of the construction.

An on-site turning area shall be provided within the future car park area so that movement to/from the site is undertaken in a forward direction, at all times.

During construction, a limited amount of on-site parking will be available for key contractors and staff, with the number and location of these spaces changing based on the construction phase and available space not needed for truck operations. The site is well-served by bus routes and has adequate cycling and walking facilities. Public and active transport, as well as carpooling, will be promoted to reduce reliance on private vehicles and minimize parking demands. If parking is unavailable at certain stages, the contractor must prepare and manage a plan to address parking needs and ensure ongoing monitoring and management.

Figure 18 Construction Vehicle Routes



Source: TIA

The CTMP estimates that during the peak construction periods, the maximum daily movements are in the order of 362 vehicles per day which is far less than the operational traffic volumes. Importantly, the construction traffic volumes are lower than the trip generation volumes assessed in the previous traffic modelling for the original 3-level scheme. Therefore, recognising that the key intersections are anticipated to perform satisfactorily based on the previous traffic modelling assessment, it can be assumed that the intersections would satisfactorily accommodate the lower volumes of construction traffic.

Operational Traffic Impacts

Ason Group have provided an assessment of the proposed operational traffic impacts of the operation of the development. Based on the trip generation rates outlined in the RMS Guide to Traffic Generating Developments Updated Traffic Surveys TDT 2013/04a 2013, the proposed development is expected to generate the following total traffic volumes:

- AM peak: 108 vehicle trips, comprising (note breakdown does not exactly sum to total due to rounding)
  - 91 light vehicle trips
  - 11 heavy vehicle (rigid) trips
  - 5 heavy vehicle (articulated) trips
- PM peak: 102 vehicle trips, comprising (note breakdown does not exactly sum to total due to rounding)
  - 86 light vehicle trips
  - 10 heavy vehicle (rigid) trips
  - 5 heavy vehicle (articulated) trips

To determine the potential traffic impact of the proposed development, the TIA assesses the peak period performance of key intersections around the site using SIDRA modelling. The modelling also considered the cumulative traffic impacts associated with infrastructure projects within the area, including the Westconnex M8, M4-M5 Link and Sydney Gateway Projects. The key findings of the intersection modelling are outlined below:

- The proposal is expected to generate 35% less operational traffic compared to the 3-level scheme, resulting in an overall better outcome for traffic generation.

- SIDRA modelling indicates that additional background traffic as projected in the Strategic Traffic Forecasting Model (STFM) will result in most of the study intersections maintaining a Level of Service (LoS) D or better except for the Gardeners Road / O'Riordan Street intersection and the Princes Highway / Campbell Road intersection which will move from the existing LoS E to LoS F in the corresponding peak period, irrespective of the proposed development.
- When reviewing the traffic generation of the proposed development, it is demonstrated that the net impact is minimal on the forecast future intersection operation in the study area, with all of the LoS unchanged and DoS largely the same between the 2031 Future Base Case and 2031 Project Case scenarios.

Based on the above, no additional road upgrades or road configuration adjustments are considered necessary to support the proposed development.

Green Travel Plan

A Green Travel Plan has been prepared by Ason Group to set site specific actions and incentives to manage travel demands and embrace principles of sustainable transport to maximise the use of transport modes that have a lower environmental impact such as walking, cycling, public transport and car share schemes.

The Green Travel Plan sets a mode shift of between 18% for private car use, from the current rate of 68% to a proposed shift to 50%. This is based on emerging transport trends which are seeing the transport sector undergoing its most rapid transformation in decades. The plan also sets a target of increasing cycling and the main form of transports by 7%.

The Green Travel Plan makes the following recommendations to be implemented at occupation stage to maximise the use of transport modes that have a lower environmental impact such as walking, cycling and public transport:

- Appoint a Travel Plan Coordinator to action the initiatives outlined in the GTP to encourage greater use of sustainable transport.
- Review the GTP every 2-3 years.
- Consult with relevant parties that may influence the future of the GTP.

6.1.3.3. Mitigation Measures

Construction Stage

Final construction related matters will be addressed in a Detailed CTMP that will be prepared in response to any conditions of consent at a time when a construction contractor methodology is known (i.e. final details of work zone requirements, oversized vehicles etc)

Operational Stage

Implement the strategies set out in the Green Travel Plan.

6.1.4. Trees and Landscaping

An Arboricultural Impact Assessment (AIA) has been prepared by Civica Arborsafe. The AIA evaluates the potential impacts on trees and makes recommendations to reduce the impacts on the trees proposed for retention. Landscape Plans and a supporting report have been prepared Taylor Brammer which set out the landscape design concept for the proposed development.

6.1.4.1. Existing Environment

Existing vegetation is largely constrained to the boundaries of the site. The AIA has identified 64 trees on and within the vicinity of the site, as depicted in **Figure 19** below.

- The trees numbered 1-23 are located within the site at 1-3 Burrows Road and have been managed under an existing ArborSafe Tree Management System for the site.
- Trees 24-64 are located outside of the subject site.

Nineteen (19) species were identified across the site with the most prevalent species being the Willow Myrtle/ Peppermint, Spotted Gum and Chinese Fan Palm. The treescape is relatively young with twenty-one

(21) (36.2%) of the existing surveyed trees rated as semi-mature and a further fourteen (14) trees (24.1%) rated as young/ juvenile and twenty-three (23 trees) (39.7%) rated as mature specimens.

Figure 19 Site Map showing subject trees

Source: ArborSafe, AIA

6.1.4.2. Potential Impacts

Trees

The following table describes the proposed approach to tree management with regard to the nominated retention value described in the Arborist Report.

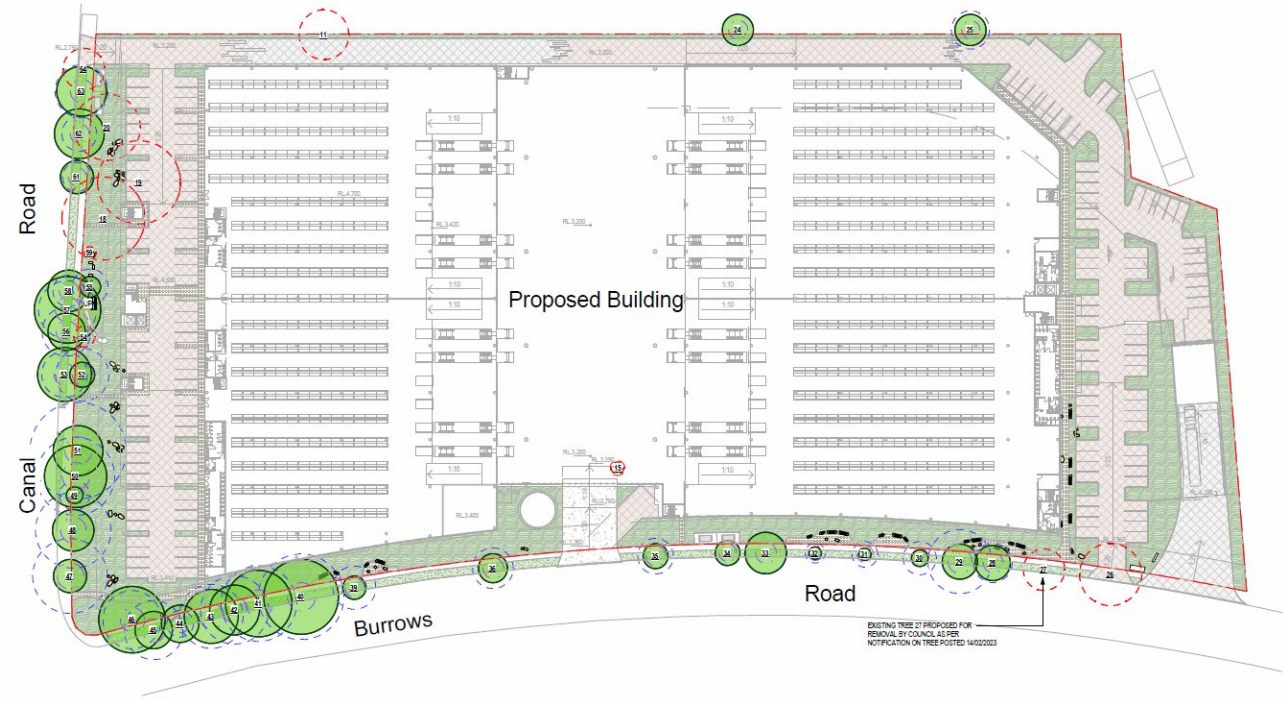
A total of twenty-three (23) trees are proposed to be removed as a result of the proposal. Three (3) of these trees are recommended to be removed irrespective of the development, due to their poor health. Of the trees requiring removal, seventeen (17) are located within the property boundary of the subject site. Six (6) of the trees are located outside of the property boundary. Four (4) of these trees were located on the nature strip and are presumed to be under the care and management of the City of Sydney. The other two (2) trees are located on the neighbouring north western property boundary.

Thirty-six (36) trees are recommended to be retained on the site. All of the trees designated for retention will require protective measures to be implemented during demolition and construction. The AIA makes recommendations regarding tree protection measures to mitigate the potential for impact on retained trees. These recommendations are included as mitigation measures in the next section. The trees proposed to be removed and retained are shown in figures below.

Table 10 Tree Retention Value

Retention Value	Removed	Retained
No retention value	3 trees	0 trees
Low (19)	13 trees	16 trees
Medium (19)	5 trees	14 trees
High (8)	2 trees	6 trees
Total	**23 trees**	**36 trees**

Figure 20 Tree retention and removal plan



Source: Landscape Plans

Landscaping

As outlined previously in **Section 3.2.2.3**, the proposal incorporates a considered site-wide landscaping strategy which integrates Country and seeks to regenerate the native ecologies of place within an urban setting. The design approach for the landscape strategy includes:

- Implementing coastal and gully landscape typology,
- Providing areas of ecological transition
- Providing landscapes reminiscent of coastal and gully areas.

The amened landscape proposal expresses the Coast to Gully narrative through plant selections, material selections and in the patterns and pathways around and through the site. An undulating landform up against the base of the building is retained and creates a geometry that complements the building form and expression.

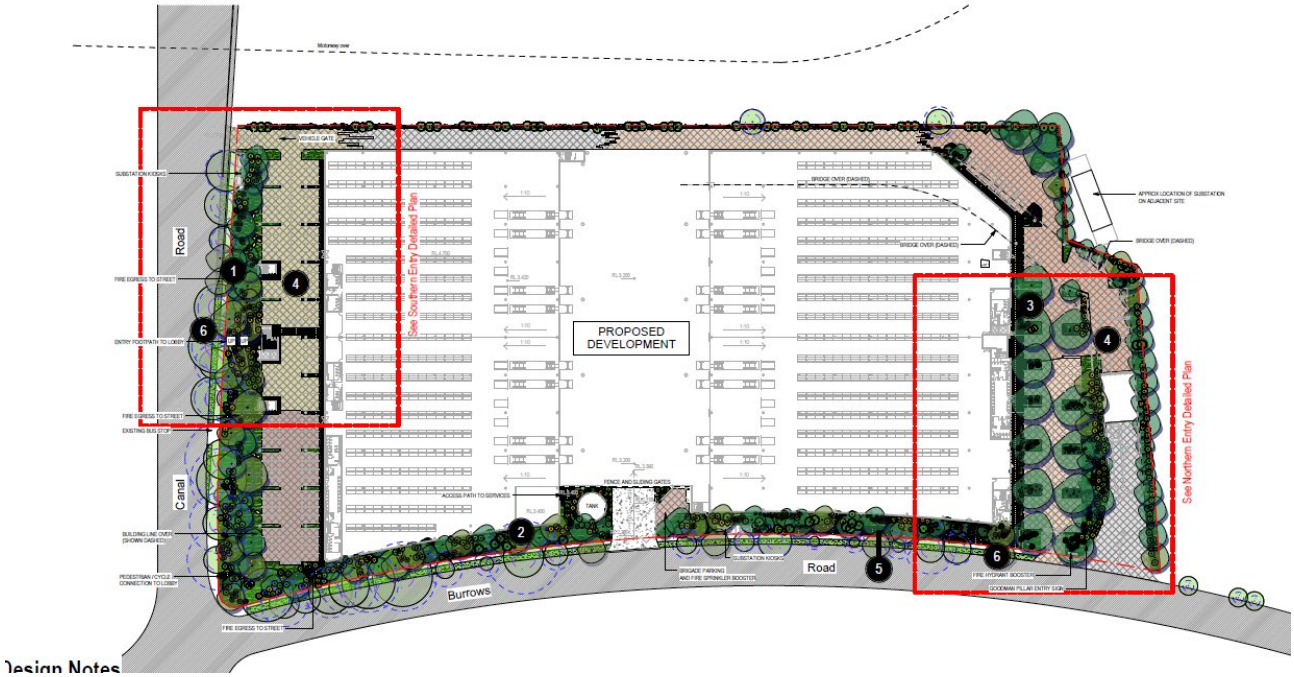
Planting selections have been made with consideration of the Coast to Gully narrative and around ideas of shelter and seasons. The planting strategy for the proposed development applies extensive greening and urban tree canopy planting across the site. The proposed tree planting strategy proposes to plant over one hundred (100) trees to offset the twenty-three (23) trees proposed to be removed. These trees have the

capacity to grow to over 10m in height and additional tree planting is proposed which will grow to under 10m in height at maturity.

Most tree species are Paperbarks (Melaleuca quinquenervia) that were characteristic of the place in precolonial times. These trees are supplemented with native Eucalypts and shrubs. In addition, the proposal includes extensive shrub and ground cover plantings incorporated with gathering spaces. Most planting is situated within the two 6-metre landscape buffers to the Burrows and Canal Roads frontages. This extensive urban canopy replenishment proposal will substantially improve the vegetation canopy and amenity across the site and for the area through its implementation and establishment. The proposed tree planting will suitably offset the trees proposed for removal.

Overall, the proposal will provide a total landscape area of 6,856sqm or 19.8% of the site, including 11% deep soil and 15.7% tree canopy coverage (compliant with Council's DCP controls).

Figure 21 Landscape Plan



Picture 26 Landscape Site Plan

Source: Taylor Brammer

6.1.4.3. Mitigation Measures

Mitigation measures are recommended in the AIA to avoid impacts to the trees to be retained on and around the site. These include:

- Appointment of a Project Arborist: An Arborist with an AQF Level 5 qualification in Arboriculture and experience in tree protection within construction sites should be engaged prior to the commencement of work on the site. The Project Arborist should be present at the following times:
  - Following the pre-start induction.
  - Whenever there is work planned to be performed within the TPZ's. Contractor to provide a minimum of five days advance notice for such visits.
  - Regular site inspections. These should occur monthly for the duration of the project.
  - At project completion to verify tree protection and retention.
- Tree Protection Fencing: Tree Protection Fencing should be erected around the Tree Protection Zones as defined in the Tree Protection Plan within the AIA.
- Trunk Protection: Where works are proposed within the TPZ of retained trees, trunk protection and/or ground protection should be implemented where standard tree protection measures will not be suitable.

- No trees were idented as requiring pruning, however minor pruning may be required to allow for vehicle egress or general site movements.
- Following each site inspection, the project arborist is to prepare a report detailing the health and structural condition of the subject tree designated for retention.
- The installation of underground services must not encroach within the TPZ of the retained trees, unless otherwise advised by the project Arborist.
- Offset plantings are recommended to be replanted to reflect the number of trees removed. Replacement trees should be planted in accordance with the requirements of Section 71.6 of the AIA.
- If any additional excavation is required, with the TPZ's of trees designated for retention, this is only to be undertaken with approval from the project arborist or responsible authority. These excavations may be required to be conducted using techniques that are sensitive to tree roots to avoid unnecessary damage.
- Irrigation and mulching are to be undertaken in accordance with the AIA.

6.1.5. Ecologically Sustainable Development

A Sustainability Management Plan has been prepared by SLR Consulting which outlines how ESD principles have been incorporated into the design and ongoing operation of the development. The proposal will exceed the relevant industry standards for sustainability and environmental performance and minimise emissions and resource consumption. Goodman is committed to receiving green star accreditation for this project.

6.1.5.1. Incorporating ESD Principles

The proposal addresses the principles of ESD including the precautionary principle, intergenerational equity, conservation of biological and ecological integrity and improved valuation, pricing and incentive mechanisms in accordance with the requirements of Section 193 of the *Environmental Planning and Assessment Regulation 2021* (previously *clause 7(4) of Schedule 2 of the Environmental Planning and Assessment Regulation 2000*).

These principles have been addressed through the implementation of a range of ESD initiatives including:

- A 2,000 kW PV Solar system that offsets approximately 2,774 MWh/year of energy usage and saves approximately 2,278,7 kgCO2/annum in greenhouse gas emissions.
- A maximum illumination density of 2 W/m2 for the warehouses, which is a significant reduction from the 4 W/m² standard, resulting in considerable energy savings.
- Daylight-controlled LED lighting in the warehouse, replacing metal halide lighting, leading to significant energy reduction and reduced maintenance.
- Motion sensors installed on all LED lights within the warehouse and offices.
- Translucent roof sheeting in warehouse areas.
- R3.7 total roof insulation for all air-conditioned office areas and R2.8 total external wall insulation for these areas.
- High-performance glazing in all air-conditioned areas or minimum NCC requirements.
- Passive solar design for external outdoor areas.
- An efficient air conditioning system.
- Power sub-metering to enable ongoing review of power consumption for the offices and warehouse.
- Selection of endemic and low-maintenance landscaping species.
- 150 kL rainwater tanks for rainwater harvesting and re-use for landscape irrigation and toilet flushing.
- Low flow fixtures and fittings including taps and shower heads;
- The project is committed to achieve a 40% reduction in average annual stormwater discharge;
- Low VOC paints, carpet and sealant for all offices;

- 5% of total parking spaces are dedicated for electrical cars with charging stations;
- Low carbon construction materials including 5% replacement of cement with fly ash; and
- At least 90% of all construction waste is re-used or recycled.

6.1.5.2. Exceeding Industry Standards

An NCC Section J Deem-to-Satisfy compliant building is used as the baseline building for energy consumption savings. NCC Section J provides the minimum requirement for energy efficiency, and it is predicted that the proposed development will have more than 144% energy reduction. The proposed development has been designed to achieve a 5-star Green Star rating. The achievement of these sustainability initiatives has been facilitated by:

- The implementation of an on-site PV solar system;
- All lighting being of a low energy LED type;
- The warehouse lighting being generally controlled zonally via motion sensor and daylight harvesting;
- The office lighting shall be controlled via dual technology infrared/ultrasonic sensor;
- Daylight harvesting function to the offices with external windows; and
- An efficient air conditioning system.

Furthermore, it is proposed that the proposed development will have a number of sustainable water-saving measures, including:

- Rainwater reuse and reticulation system – Rainwater will be harvested from the roof and reused for irrigation and toilet flushing. The reticulation will be a separate system to the domestic cold water with domestic water top up in the event of insufficient rainfall;
- Use of water saving plumbing devices; and
- Water sensitive landscape design.

The rainwater tank will be sized during the detailed design stage to ensure 100% of all non-potable water on each lot can be sourced from the tank. A 150kL tank is recommended.

By installing 4 star rated toilets, urinals and taps and the proposed rainwater harvesting facility the proposed development will reduce its potable water demand by approximately 43%.

6.1.5.3. Recommendations and Conclusion

In conclusion, the relevant ESD initiatives and Energy Efficiency measures outlined in this report are incorporated into the proposed building and development details. The proposed ESD initiatives will help to achieve significant reductions in the energy required by the development both in building and operation. The project is predicted to achieve a 144% GHG emission reduction when compared with the NCC Reference Building.

Building tuning will be conducted by the builder and SLR recommends that quarterly reviews of actual building energy and water consumption be carried out once the warehouses are operational to check the actual energy usage and energy savings and verify that all systems are performing at their optimum efficiency. This will provide an opportunity for the systems to be tuned to optimise time schedules to best match occupant needs and system performance while satisfying the sustainability target for the project.

6.1.6. Air Quality

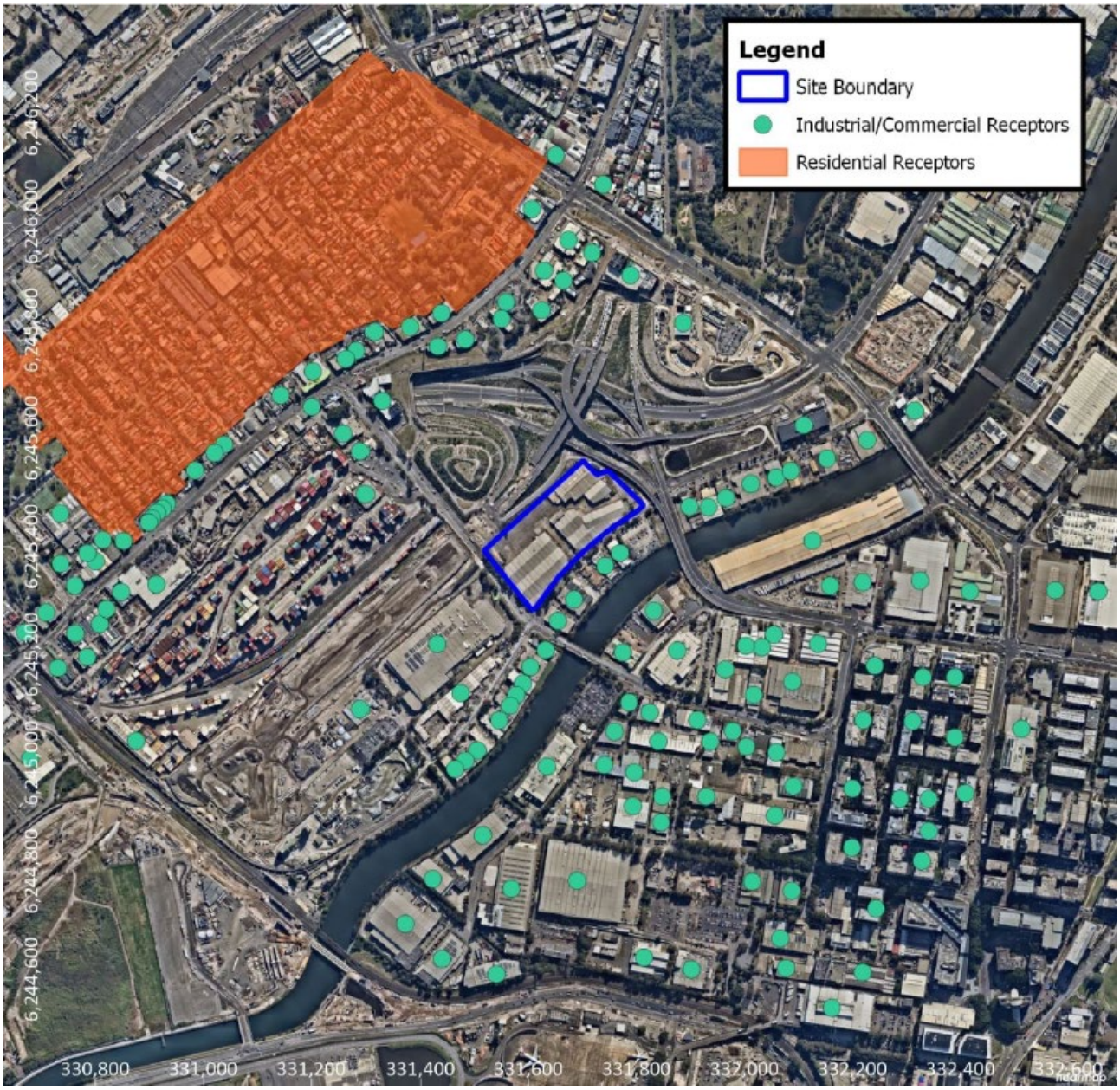
An AQIA has been prepared by SLR Consulting and is attached at **Appendix T**. The AQIA assesses the potential short- and long-term air quality impacts of key pollutants to cause adverse off-site impacts and proposes management and mitigation measures recommended for implementation, addressing Item 10 of the SEARs.

6.1.6.1. Existing Environment

Individuals at the industrial/commercial receptors noted in **Figure 22** could potentially experience air quality impacts due to the demolition and construction works at the Site. The nearest residential receptors are located approximately 500 m to the northwest of the Site boundary.

Important for air quality assessment, the topography of the Site and nearby surrounds are relatively flat with an elevation of approximately 5m Australian Height Datum (AHD).

Figure 22 Surrounding Receptors



Source: SLR Consulting

To understand the air quality context, data from the WestConnex ambient air quality monitoring station (AQMS) was utilised. The AQMS is located to the east of the development site. The emissions and flow rates recorded at the M8 Tunnel ventilation outlets were used to estimate emission rates from the proposed development. To estimate and model the rates, two scenarios were tested and then validated. The first scenario collated emissions data from the Westconnex M5 tunnel ventilation outlet.

The emission rates and stack parameters for the second scenario were derived based on the air quality emission limits described in Section L2 of the Environmental Protection Licence (EPL) for the M4-M5 Tunnel

(EPL 21372, 2022) and ventilation data used to represent the regulatory worst case scenario in the Appendix H of the New M5 Environmental Impact Statement (EIS) (WestConnex, 2015).

Emissions from the stacks associated with the operation of the New M5 and M4-M5 tunnels at St Peters were estimated based on the stack concentration data and ventilation rate (ie. air flow per outlet) data. The calculated emission rates along with the other stack parameters that will be used as input to the CALPUFF model are presented in the table below.

Figure 23 Model Inputs Scenario 2 – Worst Case Scenario

Source ID	Vent Parameters				Emission Rates			
	Diameter (m)	Velocity (m/s)	Temperature (°C)	Height (m)	PM_{10} (kg/hour)	$PM_{2.5}$ (kg/hour)	NOx (kg/hour)	CO (kg/hour)
New M5 Tunnel Vents								
1	4.8	5.7	25	20	0.4	0.4	7.2	14.4
2	4.8	5.7	25	20	0.4	0.4	7.2	14.4
3	4.8	5.7	25	20	0.4	0.4	7.2	14.4
4	4.8	5.7	25	20	0.4	0.4	7.2	14.4
M4-M5 Link Tunnel Vents								
5	4.8	5.7	25	20	0.4	0.4	7.2	14.4
6	4.8	5.7	25	20	0.4	0.4	7.2	14.4
7	4.8	5.7	25	20	0.4	0.4	7.2	14.4
8	4.8	5.7	25	20	0.4	0.4	7.2	14.4

Source: SLR Consulting

A comparison of the measured emissions from scenario 1 and the worst-case scenario was then undertaken. The results validated that the measured emission rates are well below those adopted for the regulatory worst-case scenario. Therefore, it can be concluded that the adopted regulatory worst-case scenario still represents a conservative, over estimate of the potential worst emissions, even though the measured flowrates are higher at times than the flowrate adopted for the regulatory worst case scenario.

6.1.6.2. Potential Impacts

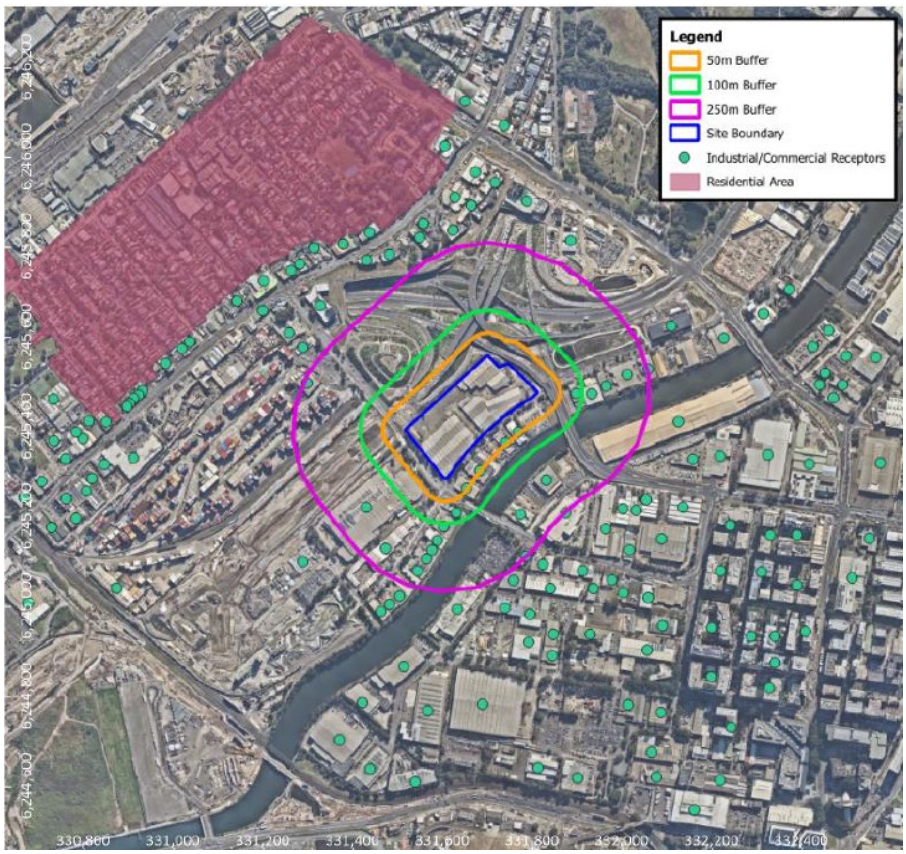
Construction Impacts

The IAQM Guidance on the Assessment of Dust from Demolition and Construction has been utilised to assess the potential impacts to air quality from construction works. Screening of the site has identified more than 100 sensitive receivers within 250m of the site boundary.

The dust emission magnitude expected for each phase of construction has been detailed in **Figure 24**. Considering the expected emission magnitudes and the surrounding area, the area has been classified as having a **low** sensitivity to dust soiling and health effects.

An assessment of these emissions in relation to the receptors indicate a **medium** risk of adverse dust soiling and human health impacts during the demolition phase and a **low** risk of adverse dust soiling and human health impacts during earthworks, construction, and trackout phases occurring at the off-site sensitive receptor location if no mitigation measures were to be applied.

Figure 24 Density of Sensitive Receptors in the Vicinity of the Site.



Source: SLR Consulting

Figure 25 Categorisation of Dust Emission Magnitude

Activity	Dust Emission Magnitude	Basis
Demolition	Large	**IAQM Definition:** Total building volume greater than 75,000 m3, potentially dusty construction material (e.g. concrete), on-site crushing and screening, demolition activities higher than 12 m above ground level. **Relevance to this Project:** *The total area of the buildings to be demolished is estimated to be approximately 28,000 m² based on aerial imagery; considering an average height of 3.4 m, the total demolition volume is likely to be greater than 75,000 m³.*
Earthworks	Medium	**IAQM Definition:** Total site area 18,000 m² to 110,000 m², moderately dusty soil type (e.g. silt), 5 to 10 heavy earth moving vehicles active at any one time, formation of bunds 3 m to 6 m in height. **Relevance to this Project:** *Total area of the site is estimated to be approximately 35,000 m² based on site layout.*
Construction	Large	**IAQM Definition:** Total building volume greater than 75,000 m³, on site concrete batching; sandblasting. **Relevance to this Project:** *Based on site layout the total warehouse area is approximately 17,500 m² and the elevation of the building is 28 m. Therefore, the total building volume is estimated to be 490,000 m³.*
Trackout	Large	**IAQM Definition:** More than 50 heavy vehicle (>3.5 t) outward movements in any one day, potentially dusty surface material (e.g. high clay content), greater than 100 m of unpaved road length. **Relevance to this Project:** *It is estimated that more than 50 heavy vehicles movements per day will occur during the peak construction period.*

Source: SLR Consulting

Operational Impact

Air quality issues associated with the proposed warehouse operations predominantly relate to emissions of products of combustion and particulate matter and from trucks and other vehicles accessing and idling at the site. These emissions will be of a similar nature to existing emissions from traffic on Burrows Road and Campbell Road. The scale and magnitude of emissions from the Project is anticipated to be significantly lower compared to the estimated annual average daily traffic on Canal Road.

The primary source of emissions considered a risk based assessment of the site which resulted in the following outcomes:

- The nature of impact from the site is anticipated to be **neutral** to the environment.
- The sensitivity of surrounding residential areas to emissions from the site is **medium**.
- The anticipated scale of emissions impact based on the small amount of traffic movements on site and its comparison to the surrounding road network is considered to be **negligible**.

Given the above, the potential impact of the Project operations on the nearest sensitive receptors is concluded to be neutral for all receptors

Potential air quality impacts on the ground and elevated levels of the proposed development from the ventilation outlets of the M8 and M4-M5 link tunnels were assessed using a combination of CALMET/CALPUFF models. The conclusions from this modelling are as follows:

- The predicted cumulative NO2 concentrations at all levels are well below (approximately 55% of) the relevant NO2 guidelines.
- No exceedances of the relevant ambient air quality criteria for PM10 would be expected at the ground and elevated levels of the proposed building.
- A small number of exceedances of the 24-hour average $PM_{2.5}$ guideline were predicted at the ground floor and elevated levels of the proposed building. Further investigation showed that these exceedances are driven by high background levels that already exceed the criterion. The incremental concentrations from the ventilation outlets are negligible on these days compared to the background $PM_{2.5}$ level recorded at the Saint Peters 2 AQMS. The modelling results also showed that the emissions from the ventilation outlets are not predicted to cause any additional exceedances of the 24-hour $PM_{2.5}$ criterion at any levels of the proposed building compared to measured background levels.
- The predicted annual average PM2.5 concentrations comply with the relevant guideline at all levels of the proposed building.

Due to the minor impacts predicted for tunnel ventilation emissions and the conservative assumptions used in this assessment, it is unlikely that future increases in traffic over the next 10 years will change this conclusion. Additionally, the rise in electric and hybrid vehicles, along with better emission controls and fuel quality, will help reduce traffic emissions in Sydney.

6.1.6.3. Mitigation Measures

Construction Mitigation Measures

The following mitigation measures should be implemented during demolition and construction to reduce the risk of impacts to an acceptable level. These measures are designated as highly recommended (H) or desirable (D) by the dust IAQM method to control dust emissions associated with demolition for medium risk projects.

Provided that the predicted worst impact from dust during the construction period is from the demolition phase, the following mitigation measures should reduce the risk of these impacts from **medium** to **low**.

- Soft strip inside buildings before demolition (retaining walls and windows in the rest of the building where possible, to provide a screen against dust).
- Ensure effective water suppression is used during demolition operations. Handheld sprays are more effective than hoses attached to equipment as the water can be directed to where it is needed. In addition, high volume water suppression systems, manually controlled, can produce fine water droplets that effectively bring the dust particles to the ground.

- Avoid explosive blasting, using appropriate manual or mechanical alternatives.
- Bag and remove any biological debris or damp down such material before demolition.

Other mitigation measures are recommended for the earthworks, construction and trackout phases to reduce risk from **low** to **negligible**. The following measures are highly recommended for implementation:

- Avoid scabbling (roughening of concrete surfaces) if possible.
- Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place. (Construction)
- Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use. (Trackout)
- Avoid dry sweeping of large areas. (Trackout)
- Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport. (Trackout)
- Record all inspections of haul routes and any subsequent action in a site log book. (Trackout)
- Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable). (Trackout)

Importantly, not all the identified mitigation measures will be practical or relevant to the Project, therefore a detailed review of the recommendations should be performed, and the most appropriate measures be adopted as part of the Construction Environmental Management Plan (CEMP).

Operational Mitigation Measures

Operation of the warehouse is considered of neutral impact from an air quality standpoint. As no anticipated adverse off-site impacts will result, no additional mitigation measures are required outside of the proposed design.

6.1.6.4. Conclusion

The AQIA assessed the potential short- and long-term air quality impacts from emissions from the ventilation stacks from the M5 and M4-M5 link motorway tunnels at ground and elevated receptors of the proposed warehouse and office buildings located 300-400m away. The AQIA concludes, that any risks can be managed by the diligent and ongoing implementation of mitigation measures assumed in the AQIA.

6.1.7. Noise and Vibration

A Noise Impact Assessment (NIA) prepared by SLR Consulting is provided at **Appendix U**. The NIA assesses the potential construction and operational noise produced by the proposed development as well as any recommended mitigation measures.

6.1.7.1. Existing Environment

The nearest receivers are industrial developments located around 30 m to the south of the site. The nearest residential receivers are located around 400 to 500 m to northwest, northeast and southeast.

The area surrounding the development has been divided into five Noise Catchment Areas (NCAs). The NCAs have been defined with the aim of grouping sensitive receivers together that would likely have similar background noise levels and similar impacts from the proposal.

The nearest receivers to the proposed development are described in Table 11.

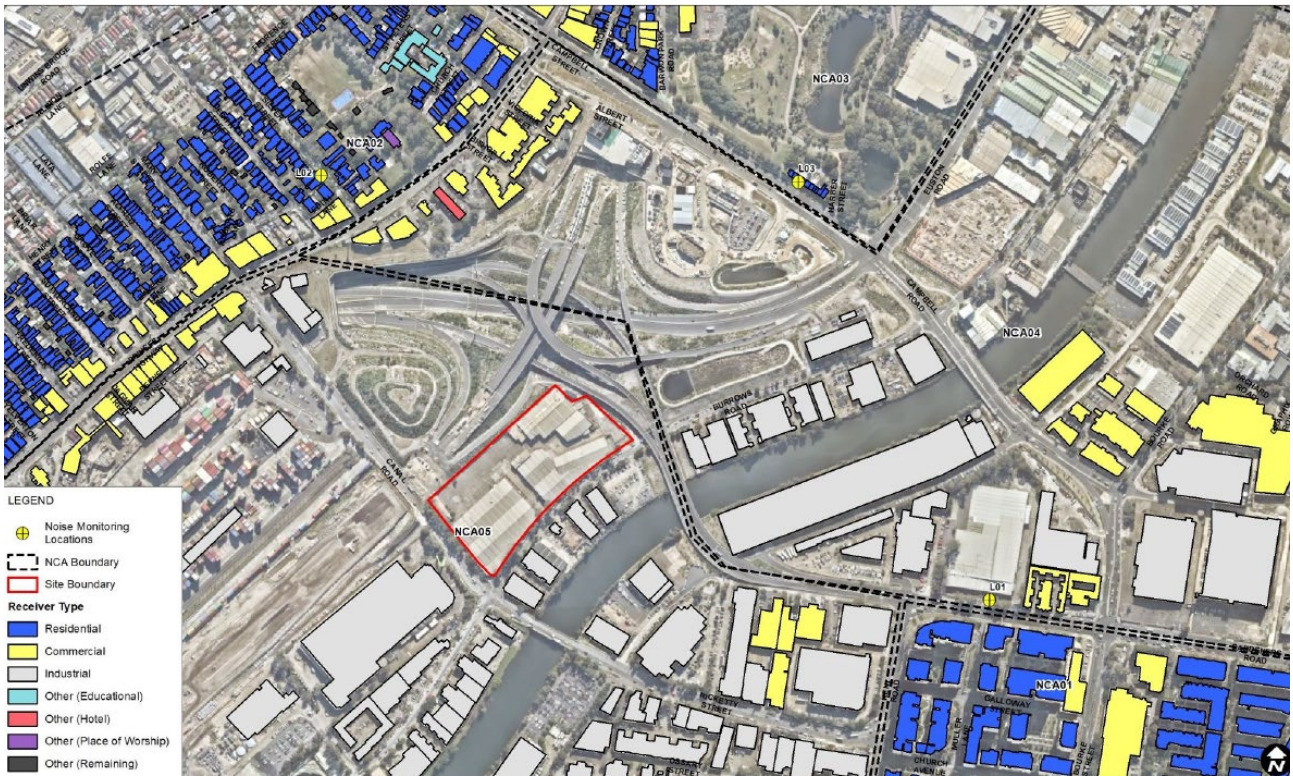
Table 11 Surrounding Receivers

NCA	Direction	Distance (m)	Description
NCA01	Southeast	530	This NCA consists of mixed use developments along Gardeners Road, which are typically multi-storey residential towers with commercial uses on ground floor. Receivers in this catchment are zoned R4 – high density residential and

NCA	Direction	Distance (m)	Description
			background noise levels are controlled by road traffic noise from Gardeners Road and Bourke Road. Commercial and industrial receivers located in the western and northern areas of the catchment.
NCA02	Northwest	400	This NCA consists of residential and commercial receivers along the Princes Highway. Residential receivers in the catchment are zoned as R2-low density residential and background noise levels in this area are controlled by road traffic noise from Princes Highway and urban hum from nearby industrial districts including frequent aircraft flyovers. St Peters Anglican Church and St Peters Public School are in the north of the catchment.
NCA03	Northeast	400	This NCA consists of residential receivers along Campbell Road, with commercial receivers near Princes Highway. Residential receivers in this catchment are zoned as R1 – general residential and background levels are controlled by road traffic noise from Campbell Road and Princes Highway.
NCA04	North	80	This NCA consists of mostly commercial and industrial receivers along Campbell Road and Euston Road. Ibis Budget St Peters is on Princes Highway.
NCA05	South	30	This NCA consists of commercial and industrial receivers generally to the south of the site, including the Cooks River Intermodal Terminal.

Source: SLR

Figure 26 Surrounding Land Use Context



Source: SLR Consulting

Unattended noise monitoring was completed in the study area in June 2022. The measured noise levels have been used to determine the existing noise environment and to set the criteria used to assess the potential impacts from the proposal. The results of the monitoring are outlined in the figure below.

Figure 27 Summary of Unattended Noise Monitoring Results

ID	Address	Measured Noise Levels (dBA)[1]					
		Background Noise (RBL)			Average Noise (L_{Aeq})		
		Day	Evening	Night	Day	Evening	Night
L01	546 Gardeners Road, Alexandria	57	54	47	67	65	62
L02	8 Silver Street, St Peters	43	45	39	57	59	50
L03	14 Campbell Road, Alexandria	56	55	47	67	65	62

Note 1: The assessment periods are the daytime which is 7 am to 6 pm Monday to Saturday and 8 am to 6 pm on Sundays and public holidays, the evening which is 6 pm to 10 pm, and the night-time which is 10 pm to 7 am on Monday to Saturday and 10 pm to 8 am on Sunday and public holidays. See the NSW EPA Noise Policy for Industry.

Source: SLR

6.1.7.2. Potential Impacts

Assessment of the potential noise impacts from construction and operation were undertaken using the following criteria:

- Noise Management Levels (NMLs) from the NSW Interim Construction Noise Guideline (ICNG)
- Construction vibration criteria
  - Those in which the occupants of the building are disturbed (human comfort)
  - Those where building contents may be affected (building contents)
  - Those where the integrity of the building may be compromised (structural or cosmetic damage)
  - Project Noise Trigger Levels from the NSW Noise Policy for Industry (NPfI)
  - Sleep disturbance screening levels from maximum noise level events during the night-time.

Construction Noise

During construction works, noise levels are expected to comply with the Noise Management Levels (NMLs) at the nearest residential receivers.

The highest impacts are anticipated during the use of noise-intensive equipment, such as rockbreakers during demolition, with exceedances of up to 6 dB predicted at the nearest residential receivers to the northwest of the site in NCA02. These exceedances are expected to be infrequent and of short duration. No residential receivers are predicted to be Highly Noise Affected at any time.

Minor exceedances of 3 to 4 dBA are expected at a place of worship in NCA02 during vegetation clearing and demolition. Construction noise levels will comply with commercial NMLs but may exceed industrial NMLs by up to 5 dB at the nearest industrial receivers during some noisy work scenarios.

Figure 28 Predicted Construction Noise Exceedances

Location	Type	NML	Predicted Noise Level – LAeq(15minute) (dBA)					
			Vegetation Clearing	Demolition	Earthworks	Construction of Roads	Construction of pads and hardstands	Construction of Structures
NCA01	Residential	67	-	-	-	-	-	-
NCA02	Residential	53	5	6	-	-	-	-
	Place of Worship	55	3	4	-	-	-	-
	Educational	55	-	-	-	-	-	-
NCA03	Residential	66	-	-	-	-	-	-
NCA04	Hotel	70	-	-	-	-	-	-
-	Commercial	70	-	-	-	-	-	-
-	Industrial	75	4	5	-	-	-	-
Legend (NML exceedances)		= Minor to marginal (1 to 10 dB exceedance)		= Moderate (11 to 20 dB exceedance)			= High (>20 dB exceedance)	

Source: SLR

All works will occur during Standard Daytime Construction Hours, with no evening or night-time work anticipated. Noise impacts are expected to be higher when noisy work is conducted near site boundaries, but will reduce when work is centralised or less noise-intensive equipment is used.

The presented impacts would only be expected to occur when noisy work is being completed close to the site boundaries, relative to each receiver. When work is in central areas of the site, or when less noise intensive equipment is being used, the noise levels would reduce accordingly.

Feasible and reasonable construction noise mitigation measures will be applied where exceedances of the NMLs are predicted.

There is potential for the industrial sites to the south to be impacted by vibratory roller cosmetic damage during road construction. Moreover, any human comfort impact from vibrations for those in the nearest industrial buildings would likely only be experienced for relatively short durations. Note all residential buildings are sufficiently distant from the site to experience any vibration affects.

Figure 29 Construction Vibration Impacts

Source: SLR

Operational Noise

Modelling was undertaken to determine what the worst case scenario would be for operational noise at the site. An assessment of the worst-case operational noise assessment against the relevant PNTLs revealed that the operational noise levels form the development are predicted to comply with the PNTLs at all identified sensitive receivers.

Figure 30 Operational Noise Assessment

Location	Receiver Type	Period	Noise Level $L_{Aeq(15minute)}$ (dBA)			Compliance
			Noise Criteria	Predicted	Exceedance	
NCA01	Residential	Day	58	39	-	Yes
		Evening	53	37	-	Yes
		Night	50	36	-	Yes
NCA02	Residential	Day	48	37	-	Yes
		Evening	43	35	-	Yes
		Night	38	34	-	Yes
	Place of Worship	When in Use	48	38	-	Yes
	Educational	When in use	43	31	-	Yes
NCA03	Residential	Day	58	38	-	Yes
		Evening	53	36	-	Yes
		Night	50	34	-	Yes
NCA04	Hotel	Day	63	44	-	Yes
		Evening	53	39	-	Yes
		Night	48	38	-	Yes
-	Commercial	When in Use	63	40	-	Yes
-	Industrial	When in Use	68	57	-	Yes

Source: SLR

A sleep disturbance assessment was also undertaken. The assessment demonstrated that the predicted night-time maximum noise levels at the nearest residential receivers are below the maximum sleep disturbance screening level, as per **Figure 31** below.

Figure 31 Sleep Disturbance Assessment

Location	Receiver Type	Source	Maximum Noise Level LAmax (dBA)			Below Screening Level
			Sleep Dist. Screening Level	Predicted	Exceedance	
NCA01	Residential	Heavy vehicle movements	62	48	-	Yes
		Heavy truck airbrake		55	-	Yes
		Truck reversing alarm		52	-	Yes
		Forklift reversing alarm		42	-	Yes
		Roller door		32	-	Yes
NCA02	Residential	Heavy vehicle movements	54	47	-	Yes
		Heavy truck airbrake		53	-	Yes
		Truck reversing alarm		50	-	Yes
		Forklift reversing alarm		40	-	Yes
		Roller door		32	-	Yes
NCA03	Residential	Heavy vehicle movements	62	49	-	Yes
		Heavy truck airbrake		56	-	Yes
		Truck reversing alarm		53	-	Yes
		Forklift reversing alarm		43	-	Yes
		Roller door		33	-	Yes

Source: SLR

6.1.7.3. Mitigation Measures

Construction Impacts

The construction impacts are expected to be relatively minor and typical for major construction near sensitive receivers, with no work planned outside of Standard Construction Hours. Standard mitigation measures, as outlined in the Transport for NSW Construction Noise and Vibration Guideline, are deemed sufficient to control most impacts.

A Construction Noise and Vibration Management Plan (CNVMP) will be prepared before work begins, identifying potentially impacted receivers, assessing noise and vibration impacts, and detailing feasible and reasonable mitigation measures. The CNVMP will also include procedures for handling complaints and outline compliance monitoring requirements.

Operational Impacts

Operational noise impacts are not expected to exceed the relevant noise criteria. Nevertheless, mitigation measures have been provided to ensure impacts are minimised. These measures will be further refined during detailed design, once specific tenants are known.

- The site layout has been designed to ensure that warehouse buildings screen the noisier areas of the development, such as hardstands and truck routes, from the nearest receivers wherever possible.
- Broadband and/ or ambient sensing alarms on forklifts will be used where possible to reduce the potential for annoying noise emissions during the night-time.
- If noise impacts from mechanical plant are identified during detailed design, quieter plant will be selected, or the plant will be relocated to a screened location from the nearest receivers, where appropriate.
- Appropriate warehouse materials will be selected during detailed design to minimize noise breakout from internal activities.

- The potential for noise breakout from internal warehouse activity will be reduced by keeping roller doors shut when loading/ unloading is not occurring.
- Noise emissions, particularly from truck airbrakes, will be minimized to reduce the potential for annoying noise emissions during the night-time.
- An Operational Noise Management Plan will be prepared. This plan will detail the measures that could be used by the various tenants to minimise general noise emissions from the site.

6.1.8. Ground and Water Conditions

A Geotechnical Investigation and Groundwater Assessment have been prepared by PSM and is appended to this EIS. The purpose of the investigation was to obtain geotechnical information on the subsurface conditions at the site and to provide geotechnical design advice and recommendations for the proposed development. Subject to the implementation of the recommendations made by PSM, the site is considered geotechnically suitable for the development.

The Civil Plans and Civil Engineering Report with Water Cycle Management Strategy provided by Costin Roe at **Appendix X** speak to the potential impacts on surface water and any mitigation measures to that end.

A Soil Salinity Investigation was also undertaken by PSM and is accompanied by a Salinity Management Plan (**SMP**) which are appended to this application.

These technical investigations and management plan seek to assess the potential impacts on soil resources and groundwater from the proposed development, as well as the salinity and aggressivity of the soil units at the site.

6.1.8.1. Existing Environment

Two separate fieldwork investigations were undertaken at the site. The first was undertaken in August of 2015 and comprised coring through the pavement to enable the undertaking of a total of 6 x cone penetrometer tests and the recovery of 3 x bulk samples for testing. The second fieldwork investigation was undertaken in April 2019. The investigations involved the drilling of 3 x cored boreholes the collection of samples and the installation of three standpipe piezometers, which were used to assess the effect of rainfall on the site's groundwater.

Additional fieldwork was undertaken to determine salinity. This involved the drilling of four (4) boreholes, with samples taken for salinity and aggressivity testing.

The results of the geotechnical testing and salinity testing are outlined below:

- Geological Setting – the site is underlain by Quaternary alluvium being peat, sandy peat and mud.
- Surface Conditions – the site is currently occupied by single storey warehouses and up to two storey offices. The north west of the site is paved with asphalt overlying a concrete slab and the north east of the site is covered with a concrete slab. The pavement is up to 300mm thick.
- Subsurface conditions:
    - Pavement: Pavement comprises asphalt and concrete slab or concrete slab only to a depth of 0m.
    - Fill was encountered below the pavement at a depth of 0.2 to 0.3m. The fill was predominantly Gravelly Sand to Clayey Sand.
    - Upper Sand: Silty sand was found at a depth of 1.0 to 3.0m
    - Upper Clay: Clay to silty clay was found at depths ranging from 2.8 to 5.2m
    - Lower sand: Sand to silty sand was found at a depth of 4.0 to 8.7m.
    - Lower clay: Clay to silty clay was found at a depth of 7.9 to 10.7m.
    - Bedrock: Bedrock comprising of dark grey to black shale was found a t a depth of 10.4 to 13.5m.
- Groundwater: Groundwater was encountered at depths between 0.6m and 1.8m. PSM advised that they would need to undertake ongoing groundwater monitoring.

- Salinity: Soils on the site are classified as “slightly saline” to “moderately saline”.

6.1.8.2. Potential Impacts

Earthworks

Minor earthworks comprising cut and fill up to +/- 1.0m will be undertaken on site, with the current subgrade levels to be maintained on the site. All earthworks are to be undertaken in accordance with the Bulk Earthworks Specification and further testing, including plate load testing and additional testing will be undertaken post demolition to confirm the findings of the previous field investigations.

Permanent and Temporary Batters

Batter slopes up to 3m high are recommended. The batters’ slopes should be protection from erosion and shall be drained.

Any temporary batter slopes are not to be left unsupported for longer than 1 month without further advice and a geotechnical engineer should undertake inspections following significant rain events.

Excavation Support

Retaining structures will be required to support cuts that are steeper than the permanent batter slopes. The design of these retaining structures should consider soil strength parameters, water pressure and surcharge loads. Both surface and subsurface drainage needs to be designed and constructed properly to prevent pore water pressures from building up behind the retaining walls or appropriate water pressures must be included within the design.

Footings

Shallow footings can be founded on or within the fill or upper sand levels. Piles footings may be required for the development and should be founded within the bedrock and designed in accordance with the relevant Australian Standards. If piles need to be founded into sand, then further advice is required to be sought. Selection of the pile system is dependent on a number of factors and should be undertaken by the designer in conjunction with the principal contractor/ builder.

Groundwater and Dewatering

A Groundwater Assessment was undertaken by PSM and is attached as **Appendix Z**. Groundwater was encountered at the site between RL 0.5m and RL 0.7m which is below the currently proposed bulk earthworks (RL 4.7m AHD). Therefore, the potential impact of the development on groundwater is expected to be minimal.

PSM recommend that consideration should therefore be given to the inclusion of a pressure relief system within the development. PSM are to review this advice based on their ongoing groundwater modelling, with the final design outcome to be determined prior to issuance of the relevant construction certificate.

Surface Water

Surface water will be further managed through civil engineering/ drainage designs. The stormwater system, surface gradients and landscaping at the site have all been designed to minimise soil erosion and impacts to the adjacent waters.

Pavements

Preliminary advice on pavement design/ thickness has been informed by 3 California Bearing Ratio (**CBR**) tests that were undertaken. These tests have determined that for the preliminary structural pavement design, a design CBR of 10% can be adopted for existing subgrade. Higher CBR values may be possible subject to further specific testing. It is recommended that specific CBR testing be undertaken at subgrade level when pavement layouts are finalised and demolition work is complete.

Salinity

A Salinity Management Plan has been prepared by PSM for the site. The Salinity Management Plan includes a series of recommendations to minimise impacts associated with the salinity of the soil. Overall, the potential impacts of the salinity to the proposed development are expected to be minimal.

6.1.8.3. Mitigation Measures

The proposed development will not excavate, discharge or have an impact on the existing groundwater supply. Water discharge points for the proposed development are identified at two points along Burrows Road and both discharge to the existing stormwater line. To this, a series of Stormwater Quality Improvement Devices (SQIDs) have been integrated into the proposed development to meet the City of Sydney's surface water quality criteria:

- Primary treatment of external areas will be made via pit inserts.
- Tertiary treatment of the development will be provided by proprietary stormwater filtration cartridges in underground tanks tank.
- Some treatment will also be present by provision of rainwater reuse tanks on development sites through reuse and settlement within the tanks.

Stormwater harvesting will serve as the primary system by which the water balance and water requirements of the proposed development will be ensured. This system is proposed for the re-use of rainwater for non-potable application such as toilet flushing and irrigation. The rainwater harvesting system will reduce water demand for the site by 50-70%. The site will be connected to the existing water and sewerage network to service the remaining water requirements of the site.

The SMP addresses the components of the proposed development at the construction stage for permanent works. The following recommendations have been made for the construction of the proposed development:

- Importation of soil
  - All fill imported onto the site will be either virgin excavated natural material (VENM) or excavated natural material (ENM).
  - High saline or contaminated soils should not be imported to the site.
- Roads, footpaths and paved areas
  - Roads, footpaths and paved surfaces should be graded and maintain that grade to avoid ponding of surface water.
  - Connections between the roads, footpath and paved surfaces and the surface water and stormwater drainage infrastructure should be designed, constructed and maintained to restrict infiltration into underlying soils.
  - Provision for a damp-proof course or membrane beneath slabs should be considered by the slab designer.
- Landscaped area
  - Promotion of successful revegetation is likely to require use of nutrient rich topsoil. Saline topsoils should not be imported to site.
  - Potential waterlogging should be minimised by:
    - Adopting plant species with minimal watering requirements
    - Adopting 'waterwise' gardening principles
    - Minimising use of potable water in landscaped areas
    - Properly designed and implemented irrigation systems
    - Establishment of perennial species and deep-rooted trees.
- Surface water, stormwater and drainage
  - Disturbance of natural drainage patterns should be reduced. Where these are disturbed or altered
  - appropriate artificial drainage should be installed
  - Stormwater and surface water should be managed to restrict infiltration

- Temporary water retaining structures used during construction should be managed to restrict infiltration
- Stormwater and surface water infrastructure should be designed and constructed to minimise the likelihood of leakage
- Guttering and down pipes should be connected and maintained
- Surface water runoff should be directed around all exposed surfaces, temporary stockpiles and landscaped areas.

- Durability of concrete structures in contact with the ground
  - The design of structural concrete members in contact with the ground (excluding piles) adopt an "A2" exposure classification as defined in AS3600:2018.
  - The design of concrete cast in situ piles adopt a "mild" classification as defined in AS2159:2009

6.1.9. Stormwater and Wastewater

A Civil Engineering Report with an Integrated Water Cycle Management Strategy (**WCMS**) has been prepared by Costin Roe and are attached at **Appendix X**.

The report includes a civil engineering assessment of the proposed development's impact on the surrounding environment in relation to soils and water including stormwater and stormwater management for both construction and operational phases of the development. The outcomes of these inputs satisfy the item 13 requirements of the SEARs.

6.1.9.1. Existing Environment

An existing formal inground drainage system is currently on the site which carries stormwater runoff from the existing warehouse buildings and surrounds offsite for discharge into trunk drainage that leads to the Alexandria Canal. The site is not affected by any overland flow paths, though overland flow paths are present along Canal Road to the south-west and Burrows Road to the south-east. Levels of the site vary between RL4.9m AHD at the northern corner and RL2.2m AHD at the southern corner.

6.1.9.2. Potential Impacts and Recommendations

A WCMS has been developed to provide guidance on urban water management issues to be addressed for the development, establishing water management targets and identifying management measures required to meet relevant requirements. The key WCM targets which have been adopted in the design and how they will be responded to/achieved are summarised at Table 11 below:

Element	Target	Recommendation
Storm Water Quantity	Minimise flooding from increased stormwater runoff due to development. Water Quantity and Management to be provided as directed by Sydney Water, the waterway manager.	Attenuation of stormwater runoff from the development is not required as the site is currently fully developed, there are existing drainage systems available for discharge based on the fully developed site and the site drains to the Alexandra Canal which is a tidal waterway which is not influenced by urban drainage runoff. Sydney Water, the waterway manager, has confirmed that onsite detention is not required for this development.
Storm Water Quality	Load-based pollution reduction targets based on an untreated urbanised catchment: ▪ Gross pollutants 90% ▪ Total Suspended Solids 85% ▪ Total Phosphorus 65% ▪ Total Nitrogen 45% ▪ Total Hydrocarbons 90%	Model for Urban Stormwater Improvement Conceptualisation (MUSIC) modelling has been completed to confirm the reduction objectives can be met for the development. The design incorporates stormwater quality improvement devices (SQIDs), including pit inserts for primary treatment and proprietary filtration cartridges for tertiary treatment. Additionally, rainwater reuse tanks will contribute to the treatment process.
Flood Management	Buildings set above the 1% AEP.	Detailed TUFLOW flood modelling for various events (up to 0.2% AEP & PMF) has been undertaken.

Element	Target	Recommendation
		The results indicate that the site is clear of significant overland flow paths up to the 1% AEP event. Design measures include siting habitable floors and buildings 500mm above the 1% AEP flood level and ensuring overland flow paths provide at least 500mm freeboard have been implemented.
Water Supply	Reduce Demand on non-potable water uses.	Rainwater reuse measures have been implemented within the design to reduce demand on non-potable uses such as toilet flushing and irrigation, in line with Greenstar requirements.
Construction Stormwater Management & Erosion and Sediment Control	A construction stormwater management plan and appropriate associated erosion and sedimentation control measures must be described in the environmental assessment for all stages of construction to mitigate potential impacts to surrounding properties.	A construction stormwater management plan with erosion and sediment control measures will be prepared, following Landcom Blue Book and Council requirements. The plan covers initial site establishment, construction stages, and the period between infrastructure completion and site development.

The proposed stormwater drainage system for the development will comprise a minor and major system to safely and efficiently convey collected stormwater run-off from the development to the legal point of discharge.

The minor system is to consist of a piped drainage system which has been designed to accommodate the 1 in 20-year ARI storm event (Q20). This results in the piped system being able to convey all stormwater runoff up to and including the Q20 event.

The major system will be designed to cater for storms up to and including the 1 in 100-year ARI storm event (Q100). The major system will employ the use of defined overland flow paths, such as roads and open channels, to safely convey excess run-off from the site.

The drainage system proposed can be described as follows:

- Site drainage system designed to the 5% AEP (1 in 20yr ARI).
- Connection of the new drainage system.
- Treatment of stormwater.
- Site discharge to public drainage system via the existing street drainage system.

6.1.9.3. Mitigation Measures

Construction Soil and Water Management

A Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan (ESCP) will be implemented for the construction of the proposed development. A staged ESCP and draft SWMP have been prepared and are included in the Civil Engineering Report. During construction, the ESCP will be in place to ensure the downstream drainage system and receiving waters are protected from sediment laden runoff, particularly in relation to the following key construction activities:

- Erosion and sediment control installation
- Grading of existing earthworks to suit building layout, drainage layout and pavements
- Stormwater and drainage works
- Service installation works

- Building construction works

The proposed controls for management of erosion and sedimentation during construction of the proposal are identified below. The proposal is considered acceptable in relation to stormwater and wastewater management, subject to the implementation of these measures.

Sediment Basins

Sediment basins are to be sized and located to ensure sediment concentrations in site runoff are within acceptable limits. Preliminary basin sizes will be calculated in accordance with the Blue Book and are based on 'Type F' soils. These soils are fine grained and require a relatively long residence time to allow settling.

Sediment basins for 'Type F' soils are typically wet basins which are pumped out following a rainfall event when suspended solids concentrations of less than 50 mg/L have been achieved.

Sediment Fences

Sediment fences are to be located around the perimeter of the site to ensure no untreated runoff leaves the site. They should also be located around the existing drainage channels to minimise sediment migration into waterways and sediment basins.

Stabilised Site Access

For the proposal, stabilised site access is proposed at any designated site entry to the works area. This will limit the risk of sediment being transported on Burrows Road, Canal Road and other public roads.

Operational Measures

Operational measures for stormwater and wastewater management are primarily achieved through stormwater harvesting and treatment:

Stormwater Treatment

Stormwater Treatment Systems (STS's) are proposed for the development. The STS's for the development shall be based on a treatment train approach. Components of the treatment train for the development are as follows:

- Primary treatment to the parking, roof, and hardstand areas is to be performed via the provision of pit inserts to all grated pits;
- Tertiary treatment is to be performed via proprietary stormwater filtration cartridges in underground tanks prior to discharge from the site;
- A portion of the roof will also be treated via rainwater reuse and settlement within the rainwater tank.

Rainwater Harvesting and Tank Sizing

The use of rainwater reduces the mains water demand and the amount of stormwater runoff. By collecting the rainwater run-off from roof areas, rainwater tanks provide a valuable water source suitable for flushing toilets and landscape irrigation.

Rainwater tanks have been designed, using MUSIC software to balance the supply and demand, based on the calculated base water demands and proposed roof catchment areas. Allowances in the MUSIC model have been made for high flow bypass which will be managed by 300mm downpipe roofwater collection configuration along a portion of the northern elevation of the warehouse. The MUSIC model predicts that the reuse demands of 50-70% will be met for the development with the provision of a minimum 80 kL rainwater tank. This is proposed to be provided as two 40kL rainwater tanks, one for each building.

6.1.10. Hazards and Risks

A Hazard Analysis Report has been prepared by Riskcon Engineering and a Hazardous Materials Assessment has been prepared by Work Science to support the original 3-level SSDA scheme. These reports remain relevant to the proposed 2-level scheme as they have been prepared to assess the risk profile of the development on surrounding land uses and provide an assessment of whether the use is considered acceptable for the context.

As the existing conditions of the site remains the same, and the proposed land use remains the same, be it at a smaller scale, the recommendations and assessments undertaken by Riskcon and Work Science remain valid.

6.1.10.1. Potential Impacts

The site is composed of two (2) banks of warehouses containing approximately 30 units. There will be six (6) units on western bank and four (4) on the eastern bank totalling ten (10) per storey across three (3) storeys.

The tenants for the units at this point are unknown; however, dedicated dangerous goods (DG) storage is not anticipated to be required, nor is it sought for the facility. It is proposed to provide a level of DG storage to facilitate the operations of tenants which may include the requirement for forklift cylinders, paints, etc. The maximum quantities of products and DGs that are to be stored at the facility are shown in **Table 12.**

Table 12 DG Classes or Materials Stored and Maximum Quantities

Description	Class	PG	Total Quantity (L)	Class Subject to SEPP (Y/N)
Forklift cylinders	2.1	n/a	1,440 kg	Y
Aerosols	2.1	n/a	400 kg	Y
Flammable liquids	3	II & III	2,000 L	Y
Batteries	8	III	800 kg	Y

Source: Riskcon Engineering

The results of assessment against the SEPP Resilience and Hazards indicate that the relevant criteria are not exceeded for both individual and all collective tenancies. Therefore, no further assessment against Chapter 3 of SEPP Resilience and Hazards would be required.

Furthermore, a review of the potential to cause offense was conducted which indicated the site operations would be unlikely to result in noise or odour to occur at levels which would cause offense. As the facility is not classified as potentially hazardous or offensive, it is not necessary to prepare a Hazard Analysis for the facility as Chapter 3 of SEPP (Resilience and Hazards) does not apply.

6.1.10.2. Mitigation Measures

Notwithstanding the above, the following recommendations have been made:

- The Dangerous Goods (DG) shall be stored in accordance with the Work Health and Safety Regulation 2017 and any documentation required by the Regulation shall be prepared prior to occupying the space with DGs.

6.1.11. Contamination and Remediation

The sites contamination potential has been assessed in detail under the previous 3-level scheme. The following contamination and remediation documentation was prepared for the SSDA to address item 16 of the SEARs:

- Phase 1 and 2 Environmental Site Investigation (ESA) prepared by AECOM (dated 5 March 2020);
- Remedial Action Plan (RAP) prepared by AECOM (dated 15 April); and
- Site Audit Report and Site Audit Statement (Interim Advice) prepared by Ramboll (dated 29 August 2022).

Following the exhibition of SSD 35962232, data gaps pertaining to landfill gas were identified. A further final Section B Site Audit Statement was also requested to be issued by the same Auditor certifying that the RAP is practical and the site will be suitable after remediation for the proposed use.

The data gaps were addressed in the revised RAP and Supplementary Investigation prepared by AECOM.

- Currency Review of AECOM (2020) Phase 1 and 2 ESA prepared by AECOM (dated 8 July 2022)
- Remedial Action Plan (RAP) prepared by AECOM (dated 3 March 2023);

The revised RAP and Supplementary Investigation confirmed that subject to the following matters, the SAR concludes that the site can be made suitable for the purposes of 'commercial / industrial' land use if remediated in accordance with the RAP. Conditions proposed to be included and complied with include:

1. *Preparation of an AMP and SWMP as part of a CEMP. The CEMP should include an ASSMP if the development will include works below 1 mbgl or works that would lower the water table by greater than 1 mbgl. The documents should be provided to the Auditor for review.*
2. *Preparation of a validation report demonstrating competent and successful implementation of the RAP.*
3. *Preparation of an EMP with appropriate public notification and legal enforceability and integration into the site management system. It is recommended that implementation of the EMP during site occupation is made a condition of development consent.*
4. *Preparation of a Section A2 Site Audit Statement and Site Audit Report at the completion of remediation and validation of the site.*

Revised Two-level Scheme:

AECOM conducted a review of the SSDA RAP and provided a supporting letter (dated 16 December 2024) (**Appendix Z**) which confirmed that the RAP proposed by AECOM for the three level scheme remains applicable to the proposed development and does not require updating.

The review identified that the main differences between the two schemes include:

- Recessed loading docks through the ground level in the centre of the site to mitigate the removal of contaminated material off-site.
- Changed building envelopes including two warehouse structures on either side of the loading docks, and
- Fewer deep planting zone areas.

AECOM concluded that their RAP remains applicable to the 2-level scheme as:

- The overall capping strategy of the site does not change and will be implemented.
- The management of contaminated fill material during redevelopment does not change and methodologies will be detailed in a Remedial Works Plan (**RWP**) and Construction Environmental Management Plan (**CEMP**).
- A Long-Term Environmental Management Plan will also be created.

To further validate that contamination risk at the site is to be appropriately managed, Ramboll have also confirmed that the proposed remediation strategy is suitable for the revised scheme in an Interim Audit Advice Letter dated 16 December and attached as **Appendix BB.**

6.1.12. Waste Management

An integrated Demolition, Construction and Operational Waste Management Plan (**WMP**) has been prepared by SLR and is appended to this EIS. The WMP includes processes for the handling of waste throughout all phases of the development. Requirements for waste management in new developments in the City of Sydney are covered in Council's *Guidelines for Waste Management in New Developments* (2018). These guidelines have been used to guide waste quantities and waste management the Development.

The specific objectives of the WMP are to:

- Encourage the minimisation of waste production and maximisation of resource recovery.
- Assist in ensuring that any environmental impacts during the operational life of the Development comply with Council's development consent conditions and other relevant regulatory authorities.

Given the existing buildings onsite are identified for demolition, a Hazardous Material Survey has been prepared by Work Science Pty Ltd at **Appendix CC**.

6.1.12.1. Demolition and Construction Waste Management

The Demolition and Construction Waste Management Plan details the volumes of the different waste materials anticipated to be generated during demolition and construction stage. The Waste Management Plan also details how the various waste streams will be recycled or disposed of off-site.
Every effort will be made to ensure as much demolition and construction waste as possible is recycled.

Potential Impacts:

The types and quantities of demolition and construction waste are depicted in the figure below.

Figure 32 Demolition and Construction Waste

Building	Footprint (m^2)	Waste types and quantities (m^3)						
		Timber/ Gyprock	Concrete	Bricks	Metal	Other	Asphalt	Granular Base
Building 1	9,382	38	4,203	1,923	216	169	-	-
Building 2	6,599	26	2,956	1,353	152	119	-	-
Building 3	5,085	20	2,278	1,042	117	92	-	-
Hardstand	6,171	-	1,851	-	370	309	-	-
Carpark	5,577	-	125	-	-	-	167	697
Total	**32,814**	**84**	**11,414**	**4,319**	**855**	**688**	**167**	**697**

Picture 27 Demolition Waste

Development Component	Area (m^2)	Waste types and quantities (m^3)								
		Timber	Concrete	Bricks	Gyprock	Sand or Soil	Metal	Other	Asphalt	Granular Base
Warehouses	30,269	76	636	499	136	1,453	182	151	0	0
Hardstand, carpark, ramps	63,111	0	1,120	0	0	2,505	313	261	33	137
Office Building	3,762	192	707	320	324	331	103	188	0	0
Total	**97,142**	**268**	**2,463**	**819**	**460**	**4,289**	**598**	**600**	**33**	**137**

Picture 28 Construction Waste

Source: SLR, Waste Management Plan

Mitigation Measures:

To avoid unnecessary waste generation, construction of the proposed development should follow best practice waste management and ESD principles, including the following:

- Using prefabricated components
- Using low formaldehyde wood products, post-consumer reused timber and/or Forest Stewardship Council certified timber
- Using fittings and furnishings that have been recycled, are made from or incorporate recycled materials and have been certified as sustainable or environmentally friendly by a recognised third-party certification scheme
- Preferentially using building materials, fittings and furnishings, including structural framing, roofing and façade cladding, that have longer life and better re-use and recycling potential
- Reducing the use of polyvinyl chloride products
- Preferentially using paints, floor coverings and adhesives with low VOC (volatile organic compound) content
- Avoiding unsustainable timber imports including western red cedar, oregon, meranti, luan or merbau

- Selecting materials based on low embodied energy properties that suit the Project, such as recycled materials including recycled steel and glass-wool insulation, or concrete with slag and fly ash content
- Centralising wet areas together to minimise piping, and
- Designing for deconstruction rather than demolition.

Recommendations for the Building Contractor include:

- Applying practical building designs and construction techniques
- Minimising excavation works
- Investigating leased equipment and machinery rather than purchase and disposal
- Sorting and segregating site preparation and construction wastes to ensure efficient recycling of wastes
- Preferentially selecting building materials, fittings and furnishings, including structural framing, roofing and façade cladding, that have longer life and better re-use and recycling potential
- Storing wastes on-site appropriately to prevent cross-contamination and/or mixing of different waste types
- Reducing packaging waste by:
    - Returning packaging to suppliers where practicable to reduce waste further along the supply chain
    - Purchasing in bulk
    - Requesting cardboard or metal drums rather than plastics
    - Requesting metal straps rather than shrink wrap, and
    - Using returnable packaging such as pallets and reels.
- Arranging deliveries ‘as needed’ to mitigate degradation, weathering or moisture damage, and
- Ensuring subcontractors are informed of and implement site waste minimisation and management procedures.

Effective management of construction materials and waste, including options for reuse and recycling where applicable and practicable, will be conducted. Only waste that cannot be cost effectively reused or recycled is to be sent to landfill or appropriate disposal facilities. The following specific procedures will be implemented:

- concrete, tiles and bricks should be reused or recycled off-site
- steel should be recycled off-site, and all other metals should be recycled where economically viable
- framing timber should be reused on-site or recycled off-site
- windows, doors and joinery should be recycled off-site, where possible
- all used crates should be stored for reuse unless damaged
- all glass that can be economically recycled should be recycled
- all solid waste timber, brick, concrete, rock that cannot be reused or recycled should be taken to an appropriate facility for treatment to recover further resources or for disposal to landfill in an approved manner
- all asbestos, hazardous and/or intractable wastes should be disposed of in accordance with SafeWork NSW and NSW EPA requirements
- provision for the collection of batteries, fluorescent tubes, smoke detectors and other recyclable resources should be provided on site, and
- all waste and recycling should be disposed of through a council approved system.

6.1.12.2. Waste Storage Areas & Removal

Construction phase Waste Storage Areas & Removal Waste storage areas will be accessible and allow sufficient space for storage and servicing requirements. The storage areas will also be flexible in order to cater for change of use throughout the project. Where space is restricted, dedicated stockpile areas will be delineated on the site, with regular transfers to dedicated skip bins for sorting. All waste placed in skips or bins for disposal or recycling will be adequately contained to ensure that waste does not fall, blow, wash or otherwise escape from the site. Waste containers and storage areas will be kept clean and in a good state of repair. Applicable weather protection measures should be considered for storage spaces. The frequency of the waste removal will, in most cases, be dictated by the quantities of material being deposited into each of the dedicated skip bins. All skips leaving the site will be covered with a suitable tarpaulin to ensure that the spillage of waste from the skips while in transit is eliminated.

6.1.12.3. Hazardous Material Survey

From the Hazardous Waste Survey conducted on 9 November 2021, the results revealed that Units 1 to 9 contained asbestos dust and SMF, the external area and Unit 1 containing lead paint, and Unit 1 also containing lead dust.

Mitigation Measures

To mitigate any potential impacts from hazardous materials during demolition and construction, the following recommendations should be implemented:

- Asbestos Containing Materials
- Engage a licenced asbestos contractor to repair and/or encapsulate damaged surfaces (e.g. Various locations - Eaves, Unit 3 & Unit 4 – Telecommunications pit) with a suitable asbestos sealant as soon as practicable. Once sealed maintain in good condition and incorporate into a HMMP. Remove by licenced asbestos removal contractor if item is to be impacted by refurbishment or demolition.
- Maintain in good condition and incorporate into a HMMP. Remove by a licenced asbestos removal contractor prior to refurbishment or demolition.
- Lead Containing Paint and Dust
    - Unit 1 - All dust, dirt and sediment material with lead levels above the adopted standard (i.e. above 300mg/kg) should be removed under controlled conditions. In the interim ensure dust generation is avoided. Works in the area should be conducted in accordance with the site specific HMMP.
    - Engage an appropriately experienced/trained contractor to remove areas of flaking paint and stabilize (e.g. Unit 1 – door frames). Once stabilised, maintain in good condition and incorporate into a HMMP. Remove under controlled conditions prior to demolition or refurbishment.
    - All surfaces painted prior to 1997 should be assumed to contain lead above the current safe concentration of >0.1% w/w (AS/NZS 4361.2:2017). Conduct further testing prior to any refurbishment, remedial or demolition works on painted surfaces that is likely to generate dust or fumes.
- SMF
    - Access to exposed/damaged materials (e.g. Unit 1 – Compressed ceiling tiles, debris) should be restricted. Engage an appropriately experienced contractor to undertake remedial/removal works as soon as practicable.
    - Maintain in good condition and incorporate into a HMMP. Remove under controlled conditions prior to demolition or refurbishment.

6.1.12.4. Operational Waste Management

The operation of the Development is likely to generate the following broad waste streams:

- Domestic type waste generated by employees, including food waste
- Bulk packaging waste, including polystyrene, plastic wrapping and cardboard boxes
- Office waste

- Garden organic waste from landscaped areas
- Bulky waste items such as furniture and e-waste.

The following quantities of operational waste and recycling are expected. Waste storage areas of 20m^2 have been provided for each warehouse which is in excess of the required 8m^2.

Table 13 Estimated quantities of operational waste and recycling

Warehouse	Total GFA (m^2)[16]	Quantities per day (L)			Quantities per week (L)		
		Garbage	Recycling	Food	Garbage	Recycling	Food
Warehouse G-1	3,616	382	424	21	2,677	2,969	146
Warehouse G-2	3,632	384	426	21	2,688	2,980	146
Warehouse 1-3	4,313	445	472	13	3,113	3,301	94
Warehouse G-3	4,371	461	510	24	3,229	3,569	170
Warehouse 1-1	4,502	469	506	18	3,281	3,539	129
Warehouse 1-2	5,218	546	595	24	3,823	4,164	170
Warehouse 1-3	3,427	358	390	16	2,509	2,729	110
Warehouse 1-4	4,429	467	515	24	3,269	3,606	169
Total	33,503	3,513	3,837	161	24,589	26,857	1,134

Source: SLR – Waste Management Report

Mitigation Measures

The following measures are to be implemented to reduce operational waste.

Waste avoidance:

- Returning packaging materials like cardboard to the suppliers through the services of the supplier delivery trucks, allowing the reduction of waste further along the supply chain
- Providing ceramic cups, mugs, crockery and cutlery rather than disposable items
- Bulk purchasing and the purchasing of items that use minimal packaging
- Presenting all waste reduction initiatives to staff and tenants as part of their induction program, and
- Leasing equipment and machinery rather than outright purchase and disposal.

Re-use:

- Possible re-use opportunities include establishing systems with in-house and supply chain stakeholders to transport products in re-useable packaging where possible.

Recycling opportunities include:

- Collecting and recycling e-wastes
- Printer toners and ink cartridges, if purchased, are collected in allocated bins for appropriate contractor recycling
- Paper recycling trays provided in communal and staff areas for scrap paper collection and recycling

- Providing separate receptacles for general waste, recycling and paper and cardboard throughout public areas, as well as within staff areas, to encourage source-separation of waste streams
- Work with tenants to investigate opportunities for the use of recycled paper bags or reusable bags in place of plastics bags
- Separating, by a reasonable distance, the storage areas for recyclables from the general waste storage areas to avoid cross contamination, and
- Development of 'buy recycled' purchasing policy.

Communication strategies and signage:

- The Facilities Manager will be responsible for regularly and clearly communicating waste management initiatives to staff, cleaners, and visitors, ensuring improved service satisfaction, increased recycling participation, and achievement of environmental goals while reducing contamination and penalties. They will implement consistent signage and colour-coded bins in compliance with Australian standards, providing clear labels and instructions to guide proper waste separation and disposal.

6.1.13. Flooding Risk

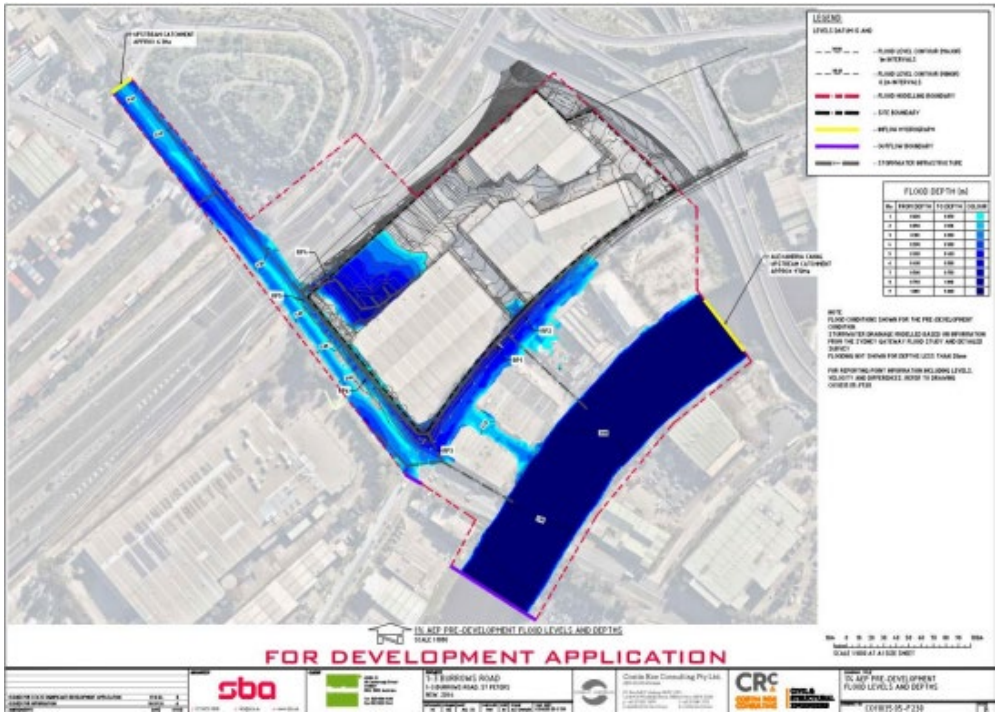
An assessment of overland flow and flooding in relation to the proposed development has been undertaken by Costin Roe and the findings are included within the Civil Engineering Report at **Appendix X**.

A detailed site specific TUFLOW model of the pre and post development conditions has been completed by Costin Roe Consulting. The assessment being completed with consideration to City of Sydney Council policy and the *NSW Floodplain Development Manual*.

6.1.13.1. Existing Environment

The site is located within the Alexandra Canal Catchment. The Council Flood Study and assessments by Costin Roe Consulting confirm that the site is subject to a minor overland flow path from Canal Road (**Figure 33**). Ponding on the rear of the site in the pre-development condition is related to high tailwater levels in Alexandra Canal and low-lying nature of the area.

Figure 33 Flood depths at the existing site in the 1%AEP

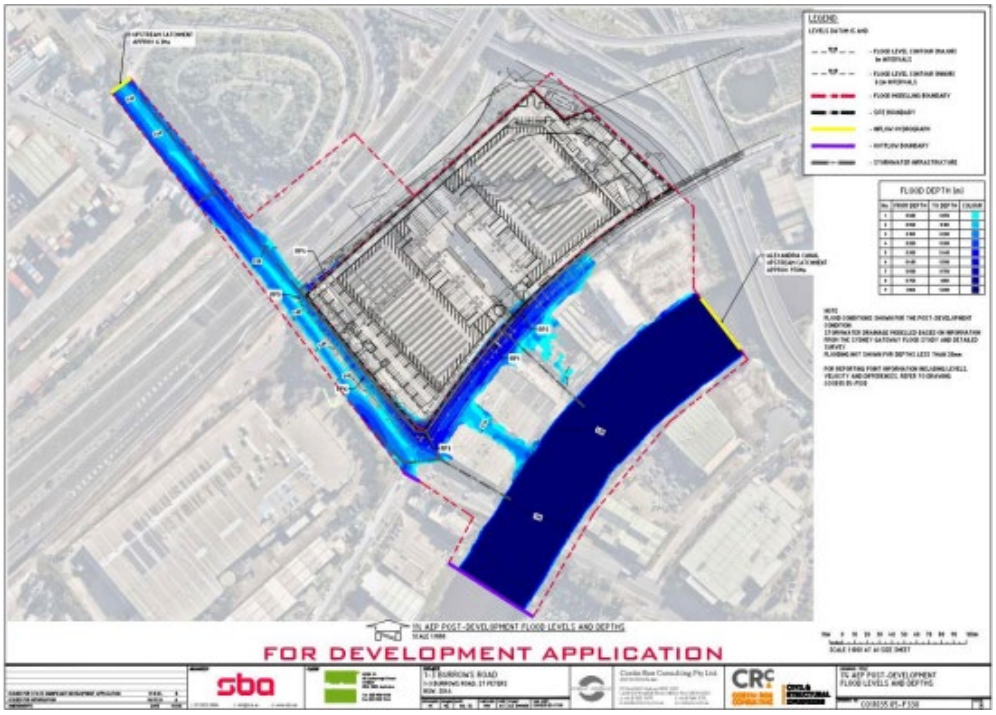


Source: Flood Report – Costin Roe

6.1.13.2. Potential Impacts and Mitigation Measures

The proposed development will contribute to improved flood management. Post development conditions include a redistribution of the site catchments with approximately 1Ha being discharged further downstream than its existing condition, improving conveyance of council trunk drainage and as such reducing flood extents to Canal Road and areas surrounding the property in the 1% AEP. The modelling and assessments completed confirm appropriate flood planning requirements have been met, and that the project results in improved drainage and flooding conditions.

Figure 34 Flood depths in the 1%AEP post-development



Source: Flood Report – Costin Roe

The hardstand and floor levels of the development have been set at 0.9m and 2.2m respectively above the 1%AEP level. This FFL has increased from the 0.5m that was originally submitted. This will ensure that flooding and gutter flows do not affect the operation of the development.

Additional modelling has been undertaken, taking into consideration the effects of climate change on flood conditions. The warehouse will achieve 2.2m additional freeboard which is in excess of what the City of Sydney Flood Policy requires. This will ensure limited residual risk associated with future climate change impacts.

Site runoff will be management in accordance with the Construction Soil and Water Management Plan included within the Civil Engineering Report.

6.1.13.3. Conclusion

A review of available flood studies has been made to determine flood behaviour in relation to the proposal. A review of the available information, including Council's adopted 2020 Flood Study and new M5 EIS SSI-6788 has been made. Detailed TUFLOW flood modelling has also been completed by Costin Roe and is captured in the attached Civil Engineering Report.

Overall flood risk for the development is considered low to negligible, and the development meets current council flood policy. It is considered there is no impact on flooding for all events to the 1% AEP and the proposed building and internal habitable areas will not be impacted by flood waters up to the 1% AEP.

6.1.14. Social Impact

Urbis has prepared a Social Impact Assessment (SIA) for the proposal which is attached at **Appendix FF**. It involved a detailed study to scope potential positive and negative social impacts, identify appropriate mitigation and enhancement measures and provide recommendations aligned with professional standards

and statutory obligations. Consultation has been undertaken with the City of Sydney Council, Inner West Council and Bayside Council in the preparation of the SSDA and Amendment Report.

The NSW Department of Planning, Housing and Infrastructure's (DPHI) Social Impact Assessment Guideline (2023) states that a SIA should consider the likely changes to the following social elements of value to people: way of life, community, accessibility, culture, health and wellbeing, surroundings, livelihoods and decision-making systems. The methodology to prepare the SIA was informed by DPHI's SIA Guideline (2023). Potential social impacts of the proposal are assessed by comparing the magnitude of impact (minimal to transformational) against the likelihood of the impact occurring (very unlikely to almost certain) per DPHI's Guidelines.

6.1.14.1. Existing Environment

The SIA provides a social baseline of the study area including the site locality, social context, demographic characteristics, engagement outcomes and areas of social influence. A community profile has been developed for the combined areas of St Peters and Mascot, as the site is located near the boundary of both suburbs. This is an important tool in understanding how a community currently lives and that community's potential capacity to adapt to changes arising from a proposal.

Key characteristics of both areas and the community include:

- High proportion of young adult population (aged 20-39 years old).
- High proportion of residents that are educate with a bachelor's degree or above.
- High rates of residents living in flats or apartments.
- Both suburbs have low rates of unemployment – St Peters (4%) and Mascot (6%).
- St Peters had a significantly higher weekly median household income of $2,924. Mascot had a lower weekly median income of $2,253.
- 28% of Mascot residents travel to and from work by private car, whilst St Peters had a lower proportion of residents at 20%.
- Data from the NSW Bureau of Crime Statistics and Research (March 2023 – March 2024), found that St Peters is susceptible to break and enter non-dwelling, steal from motor vehicle and Steal from dwelling crime. Data also found that Mascot is susceptible to steal from person, and motor vehicle theft crimes.

6.1.14.2. Potential Impacts

The SIA assesses the expected and perceived impacts considered to have the most significant impacts on the community and identified stakeholder groups. Urbis have assessed and identified social impacts considered to have a neutral to low impact on the community, as well as moderate to high impacts which could be considered to have a significant impact on the community. The potential impacts and the proposed mitigation, enhancement and management measures are outlined in the table below.

Table 14 Social impact and mitigation measures

Impact Category	Impact Description	SIA Recommendations	Mitigated Assessment
Way of life	Access to goods to support people's day-to-day needs	No enhancement measures are identified at this stage. The enhanced impact therefore remains as medium positive.	Medium positive
Community	• Access to worker amenities and services • Access to worker amenities that support worker health and wellbeing, such as outdoor areas and end of trip facilities • Connection to Aboriginal culture and heritage • Creating a safe urban environment and delivering	Refer to section 6.3 of the SIA.	

Impact Category	Impact Description	SIA Recommendations	Mitigated Assessment
	public domain and visual environment improvements.		
Accessibility	Access to worker amenities and services	• Collaborate with future tenants of the development to ensure employees are aware of the amenities available within the building and the surrounding area.	Medium positive
Culture	Connection to Aboriginal culture and heritage	• Continue to collaborate with Aboriginal stakeholders and key consultants, including Yerrabingin, TaylorBrammer (landscape architect) Welsh and Major (architect) to implement the proposed Connecting with Country design responses during the detailed design and construction stages.	High positive
Health and wellbeing	Air quality impacts on health and wellbeing	• Implement the operational air quality mitigation measures as outlined in the Air Quality Impact Assessment when the proposal is operational.	Low negative
Health and wellbeing	Noise impacts on health and wellbeing	• Prepare a construction noise and vibration management plan (CNVMP) prior to issue of the construction certificate. The CNVMP should reassess all construction noise on sensitive receivers based on the confirmed construction methods, including potential cumulative impacts, and provide appropriate mitigation measures. It should also contain complaint handling procedures and detail any compliance monitoring requirements. • As recommended in the NIA, prepare an Operational Noise Management Plan (ONMP) prior to issue of the occupation certificate. The ONMP should detail the measures that could be used by future tenants to minimise general noise emissions from the site.	Low negative (construction), Neutral (operation)
Health and wellbeing	Design elements and inclusions to enhance worker wellbeing	• Include kitchenette and indoor seating areas in the architectural plans prepare	High positive
Surroundings	Creating a safe urban environment	• Continue to implement the four CPTED principles (surveillance, access control, territorial reinforcement and space and activity management) during the proposal's detailed design phase. This should include detailing access control interventions, such as CCTV and swipe card readers at building entries. • Future warehouse tenants should provide a 24/7 security officer presence to help increase feelings of safety within and surrounding the site.	High positive
Surroundings	Public domain and visual environment improvements	• Continue to collaborate with Cultural Capital through the detailed design and construction phases to further	Medium positive

Impact Category	Impact Description	SIA Recommendations	Mitigated Assessment
		develop the public art concept. As recommended Curatorial Vision appendix of the Design Report, the artwork should be delivered by an emerging First Nations artist to align with the commitment to Connecting with Country.	
Livelihoods	Increased employment opportunities	• Collaborate with future warehouse tenants and the transport consultant to implement the objectives and strategies outlined in the Green Travel Plan to enhance opportunities for future workers without a car access the site. • Undertake early and transparent consultation with the current warehouse tenants to ensure they are aware of the redevelopment have suitable time to find an alternative warehouse premises. This could include providing these tenants with options for other nearby Goodman warehouse spaces that may be vacant.	Medium positive
Decision-making systems	Refer to Section 6.9 of the SIA for impact discussion.		
Cumulative social impacts	• Construction impacts • Access to goods to support people's day-to-day needs • Improved public domain		

6.1.14.3. Mitigation Measures

The following recommendations are provided to further manage the potential construction and operational noise impacts of the proposal the proposal:

Communication

- Collaborate with future tenants of the development to ensure employees are aware of the amenities available within the building and the surrounding area.
- Undertake early and transparent consultation with the current warehouse tenants to ensure they are aware of the redevelopment have suitable time to find an alternative warehouse premises. This could include providing these tenants with options for other nearby Goodman warehouse spaces that may be vacant.
- Collaborate with construction contractors and future warehouse tenant/s to develop a robust and fair complaint management procedure. The procedure should:
  - Be accessible to community members with opportunities to provide feedback through multiple forums
  - Be transparent, with clear information on how complaints are handled and expected timelines for resolution
  - Include clear and responsive communication with the individual or group expressing the complaint
  - Include a documented record of all complaints, including the details on the type of complaint, and date and time, actions taken and the final resolution.

Design

- Continue to collaborate with Aboriginal stakeholders and key consultants, including Yerrabingin, TaylorBrammer (landscape architect) Welsh and Major (architect) to implement the proposed Connecting with Country design responses during the detailed design and construction stages.
- Include kitchenette and indoor seating areas in the architectural plans prepared for the detailed design phase to ensure workers have access to indoor breakout and rest spaces.
- Continue to implement the four CPTED principles (surveillance, access control, territorial reinforcement and space and activity management) during the proposal's detailed design phase. This should include detailing access control interventions, such as CCTV and swipe card readers at building entries.
- Continue to collaborate with Cultural Capital through the detailed design and construction phases to further develop the public art concept. As recommended Curatorial Vision appendix of the Design Report, the artwork should be delivered by an emerging First Nations artist to align with the commitment to Connecting with Country.

Construction management

- Prepare a construction noise and vibration management plan (CNVMP) prior to issue of the construction certificate. The CNVMP should reassess all construction noise on sensitive receivers based on the confirmed construction methods, including potential cumulative impacts, and provide appropriate mitigation measures. It should also contain complaint handling procedures and detail any compliance monitoring requirements.
- To minimise potential cumulative impacts during construction, it is recommended the construction contractor and the proponent consult with surrounding landowners of future developments to understand expected construction timelines and activities. This should be reflected in a detailed Construction Management Plan (CMP) which should be prepared prior to the construction certificate.

Operation management

- Implement the operational air quality mitigation measures as outlined in the Air Quality Impact Assessment when the proposal is operational.
- As recommended in the NIA, prepare an Operational Noise Management Plan (ONMP) prior to issue of the occupation certificate. The ONMP should detail the measures that could be used by future tenants to minimise general noise emissions from the site.
- Provide a 24/7 security officer presence to help increase feelings of safety within and surrounding the site.
- Collaborate with future warehouse tenants and the transport consultant to implement the objectives and strategies outlined in the Green Travel Plan to enhance opportunities for future workers without a car access the site.

6.1.15. Infrastructure Requirements and Utilities

An Electrical and Communications Assessment (ECA) prepared by Edgewater Connections are attached at **Appendix GG**. These reports provide an assessment of the proposed development on the existing surrounding infrastructure, satisfying item 21 of the SEARs.

6.1.15.1. Existing Utilities

Ausgrid

- There are existing Ausgrid assets located under Burrows Road (132kV, 11kV and 415V) and Canal Road (132kV,11kV and 415V).
- One existing chamber substation S.1629 is located on the site. Due to the redevelopment of the site the existing substation is required to be removed as it falls within the proposed building footprint. The low voltage distributor to the street is required to be maintained throughout any works.

Telstra

There are existing underground Telstra copper and fibre optic assets located within Gardeners Road. There is also Telstra network within the site servicing the existing building that would need to be removed as part of the redevelopment.

Other communications carries

There are a number of other communications carriers that have underground infrastructure in the vicinity of the site, however they do not currently service the site.

6.1.15.2. Potential Impacts

Electricity

The proposed multi-level warehouse development has a base-build maximum demand of around 1800kVA, which includes provisions for refrigeration and food processing in part of the development. The low voltage distributor supply to be maintained is about 200kVA.

Consequently, two 1000kVA kiosk substations have enough capacity to support the proposed redevelopment. Space has been allocated for the potential installation of an additional kiosk substation in the future to handle any increase in demand.

Ausgrid has confirmed through the Design Information Package that the existing 11kV cables at the site's frontage can support this load. To accommodate the proposed driveway locations, existing streetlight columns and electricity poles will need to be relocated.

Communications

There is an extensive network of multiple communications carriers along both frontages of the site. It is not envisaged that there will be any difficulty in providing a service from one of these networks to the site.

6.1.16. Construction, Operation and Staging

Construction is expected to occur over a period of 18 months and will be separated into 5 construction certificate phases. The construction certificate phases are as follows:

- CC1 – Demolition, site works, and earthworks;
- CC2 – In-ground and structure works;
- CC3 – Façade, services and fit out works;
- CC4 – Landscape and external works; and
- CC5 – Public domain related works

The tasks required in the first and second phases can be undertaken partly concurrently. It is anticipated that construction will be undertaken during the following hours:

- Monday to Friday: 7.30am – 6pm
- Saturday: 7am – 3.30pm
- Sunday and Public Holidays: no works to be undertaken
- Operation of the site will not begin until all requisite staged construction works has been completed.

All construction will be undertaken in-line with the CTMP provided within the TMAP at **Appendix O** and WMP at **Appendix CC**. Detailed construction staging and the duration of each stage of works will be determined post approval as part of the CC phase inputs.

6.2. STANDARD ASSESSMENT IMPACTS

6.2.1. Aboriginal Cultural Heritage

An Aboriginal Cultural Heritage Assessment (ACHA) has been undertaken by Artefact Heritage in 2022 and an updated Aboriginal Cultural Heritage Assessment Report (ACHAR) dated November 2024 was prepared and is attached as **Appendix EE**.

The ACHAR found that the study area had nil-low archaeological potential to retain intext archaeological deposits that may contain Aboriginal objects. The basis for this assessment is as follows:

- An extensive search of the Aboriginal Heritage Information Management System (AHIMS) which did not reveal any sites listed in the study area
- No previously unrecorded Aboriginal sites or objects were identified within the study area during the site inspection
- The study area has been disturbed through the construction of several warehouses and associated infrastructure including truck loading docks and carparks and landscaping and subsurface works
- In-depth background research and assessment following an archaeological survey.
- The historical images support a history of disturbance in the study area illustrating that buildings have been erected, parts demolished and rebuilt and subsequently extended since at least 1951.
- The detrimental effects to soil integrity due to construction works is further heightened by the high levels of disturbance of the soil profile of the broader area in which the study area sits, which has been classified as “disturbed terrain”.
- The predictive model for the area does not support the likelihood of archaeological sensitivity being present in the study area.
- The site officer of the Metropolitan LALC was in agreement that the study area was highly disturbed.
- As there are no archaeological values in the site, there is no scientific significance.

As such, the ACHAR concludes that no further archaeological investigation is required. The following recommendations should be implemented during the construction and operational stages of the proposed development:

- No Further Archaeological Investigation: No additional archaeological investigation is required unless changes to the proposal impact areas not assessed by this ACHAR, in which case further assessment would be necessary.
- Protection of Unexpected Finds: In the unlikely event of unexpected Aboriginal objects being uncovered during the activity, all work in the vicinity should cease immediately. A qualified archaeologist should be contacted to assess the find, and Heritage NSW and Metropolitan LALC notified.
- Human Remains Protocol: If human remains, or suspected human remains, are found during the activity, all work in the vicinity must cease, the site should be secured, and the NSW Police notified immediately, If the remains are believed to be Aboriginal ancestral remains Heritage NSW should also be notified.

6.2.2. Environmental Heritage

Confirmed by the heritage mapping in SLEP 2012, no heritage listed items or conservation areas are within the site or near the site. Furthermore, confirmed by the NVIA (refer to **Appendix U**), the proposed development will not result in widespread cosmetic damage that could have impacted heritage items further afield. As such, a Statement of Heritage Impact is not required as the proposed development does not pose any direct or indirect impacts on the heritage significance of the area or any listed heritage items.

6.2.3. Bushfire Risk

The site or any of the surrounding area has not been identified as bushfire prone land. As such a Bush Fire Assessment in this case would be unnecessary as such as hazard would not impact the proposed development.

6.2.4. Biodiversity

The proposal includes the demolition of all existing structures on the site and the removal of 23 trees. Accordingly, a Biodiversity Assessment was prepared which concluded that the development is unlikely to impact on any significant biodiversity values. A request to waive the requirement for a Biodiversity Assessment Report (BDAR) has been prepared by SLR and is appended to the ADR as **Appendix S**.

The BDAR Waiver Request was submitted to DPHI on the 20 December 2024 and is to be referred to the Department of Climate Change, Energy, the Environment and Water. Given that a BDAR waiver was granted for the original 3-level scheme, it is expected that the BDAR waiver request will be accepted for the amended scheme given that the proposed tree removal has reduced.

The waiver request was prepared on the basis that:

- The subject land has been historically cleared of its original native vegetation and contains existing industrial buildings. The trees and vegetation on the subject land are cultivated for landscaping purposes and do not represent native vegetation or remnant species. There are no identifiable Plant Community Types on the site.
- The site inspection did not detect any threatened species or habitats within the subject land. A single hollow bearing tree identified as Blue Quandong (Elaeocarpus grandis) was found in the northern portion of the subject land, however there was no evidence of hollow usage and under the proposed development this tree will be retained. Additionally, there are no active nests or evidence of nesting activity currently within the site.
- The vegetation identified on the development site, being limited to a number of planted trees (several of which are native species), is unlikely to provide important habitat connectivity or flight paths for any threatened species occurring in the locality.
- According to the Biodiversity Values Map, the site is not identified as containing areas of high biodiversity value.
- The development only proposes the removal of cultivated vegetation and the existing buildings. The areas of vegetation and the buildings to be removed provide marginal artificial habitats for threatened species and removal of these features is not likely to result in a significant impact on threatened species.
- The subject land contains very limited or negligible biodiversity values. The proposed development avoids removal of most of the planted vegetation at the peripheries of the subject land. Based on the results of the ecological site inspection, the areas of vegetation and the buildings to be removed provide marginal artificial habitats for threatened species and removal of these features is not likely to result in a significant impact on threatened species.
- The site does not contain any vegetated links or fauna movement corridors and the proposed development will not affect movement of threatened or migratory species through the landscape. Consequently, the project is unlikely to have a significant impact on the limited biodiversity values of the site

Accordingly, a BDAR Waiver application has been submitted to request that the requirement to submit a full BDAR is waived under clause 7.9(2) of the Biodiversity Conservation Act 2016.

7. JUSTIFICATION OF THE AMENDED PROJECT

This section of the report provides a comprehensive evaluation of the project having regard to its economic, environmental and social impacts, including the principles of ecologically sustainable development.

It assesses the potential benefits and impacts of the proposed development, considering the interaction between the findings in the detailed assessments and the compliance of the proposal within the relevant controls and policies.

7.1. PROJECT DESIGN

The design of the proposal has been carefully considered to minimise its potential impacts. The proposal seeks to meet the objectives of the project through continuing industrial and commercial land uses on the site in a new state-of-the-art employment-generating development in a highly accessible and strategic location.

The layout and design of the proposal has been developed to minimise impacts on neighbouring properties, the existing road network, and existing vegetation onsite. The design of the proposed development responds to the existing and emerging character of the area and results in a positive streetscape presentation. The proposal seeks to make efficient use of the site to deliver employment opportunities in both the short- and long-term.

A number of alternative designs have been considered for the site with a competitive design alternatives process being undertaken for the proposed warehouse and distribution centre in order to achieve design excellence. While the scheme has been reduced by one level, it has been reviewed by the DIP, who have confirmed it achieves ‘design excellence’ and is ‘substantially the same’ as the competition winning scheme.

The proposed development includes significant uplift to the site in relation to landscaping and planting. Where mitigation measures are proposed, these will enable the proposal to be construction and operated without any acceptable economic, social or environmental impacts.

7.2. STRATEGIC CONTEXT

The proposal is consistent with the State and local strategic planning policies. The site is highly suitable for the proposed development being located within an established industrial precinct, being the Southern Employment Lands. The proposal will deliver additional industrial floorspace in an appropriate land use zone, intended to meet employment growth and demand targets by providing over 400 operational jobs.

The generation of additional employment for the Eastern City Region will contribute to the 30-minute city vision set in the Region Plan. The proposal will provide a range of employment opportunities of benefit to the local community and broader Sydney region. The sustainability targets detailed in Sustainable Sydney 2030-2050: Continuing the Vision are embodied in the proposed development, achieving a 5-star Green Star rating and 5.5-star NABERs office rating.

7.3. STATUTORY CONTEXT

The assessment concludes that the proposal complies with the relevant provisions within the relevant instruments as summarised below:

- The proposed development has been assessed and designed in respect to the relevant objects of the EP&A Act as defined in Section 1.3 the Act.
- This EIS has been prepared in accordance with the SEARs as required by Schedule 2 of the EP&A Regulations.
- Consideration is given to the relevant matters for consideration as required under the BC Act and the SSD is supported by a BDAR Waiver Request that will be submitted concurrently with the ADR to the DPHI.
- This SSDA pathway has been undertaken in accordance with Chapter 2, SEPP Planning Systems as the proposed development is classified as SSD.
- Concurrence from TfNSW will be required as per Chapter 2 of the SEPP Transport and Infrastructure for ‘traffic generating development’.

- The proposal complies with all of the relevant provisions under the SLEP 2012. The proposed development is generally consistent with the objectives of the E4 zone.
- The proposed development has been assessed in accordance with Chapter 3 and 4 of SEPP Resilience and Hazards. The proposed development complies with the relevant clauses of these SEPPs.
- The proposal generally accords with the relevant provisions of the SDCP 2012.

7.4. COMMUNITY VIEWS

As set out in Section 5, feedback received during the stakeholder engagement has informed the development of the design. Consultation feedback received during the finalisation and assessment of the application will continue to be considered.

7.5. LIKELY IMPACTS OF THE PROPOSAL

The proposed development has been assessed considering the potential environmental, economic and social impacts as outlined below:

- **Natural Environment**: the proposal addresses the principles of ESD in accordance with the requirements of the EP&A Regulation and as outlined below:
    - Precautionary principle: the precautionary principle relates to uncertainty around potential environmental impacts and where a threat of serious or irreversible environmental damage exists, lack of scientific certainty should not be a reason for preventing measures to prevent environmental degradation. The development as proposed will not result in any threat of serious environmental damage or degradation. Rather, from the current state of the site, the landscaping and design proposed will result in a superior environmental outcome for the site.
    - Intergenerational equity: the needs of future generations are considered in decision making and that environmental values are maintained or improved for the benefit of future generations. The development represents a sustainable development, making best use of a brownfield site in a widely accessible location. The development will not have any acceptable impacts on the environment.
    - Conservation of biological diversity and ecological integrity: the proposal will not have any unacceptable impacts on the conservation of biological diversity and ecological integrity. The proposal will plant over 100 trees to offset to removal of 23. The proposed landscaped setbacks and terraces, will green the building, positively improving its environmental impact and visual appearance.
    - Improved valuation, pricing and incentive mechanisms: this requires the holistic consideration of environmental resources that may be affected as a result of the development including air, water and the biological realm. It places a high importance on the economic cost to environmental impacts and places a value on waste generation and environmental degradation. The development will not have any unacceptable environmental impacts in relation to air quality, water quality or waste management. The effects of the development will be acceptable and managed accordingly by the proposed mitigation measures as required.

    Overall, the proposal will not have any unacceptable impacts on the natural environment. The ESD Report identifies a number of different ecological sustainability initiatives including energy savings, energy efficiency and waste minimisation.
- **Built Environment**: the proposal has been assessed in relation to the following built environment impacts:
    - Built Form: The proposed built form sits comfortably in its context on the edge of the Southern Employment Lands, in close proximity to the St Peters Interchange and Princes Highway amongst other built forms of similar types. The proposal has a larger built form that demonstrates design excellence and is articulated by the massing and façade design, combined with the landscape strategy and public art strategy. All these strategies work to soften the built form impact and integrates a best-in-case warehouse building into the fabric of the area. The proposed has a compliant height of building, and a compliant FSR, indicating that it does not represent an 'overdevelopment' of the site.
    - Visual Impacts: the proposal will not result in any adverse visual impacts and the extent of the visual effects generated is acceptable in the immediate and wider visual context.

- Traffic Impacts: the proposal will not result in any significant traffic impacts and is considered suitable form a traffic generation perspective given the surrounding intersections will continue to operate at an acceptable level. No additional upgrades to the surrounding road network are required.
- Trees and Landscaping: the Landscape Plans / Design Statement and the AIA, the proposal includes a high level of indigenous species planting and large canopy landscaping across the site. The proposed tree removal is mitigated by the proposed offset planting of over 100 trees and the robust landscape response that has been developed with 'Connecting with Country' principles in mind.
- Noise Impact: the construction and operational noise associated with the proposed development is generally below the relevant noise criteria. Overall, the proposal has been assessed as appropriate from an acoustic perspective.

- **Social**: the proposal is assessed to have an overall neutral impact on the surrounding community.
- **Economic**: The proposal is assessed to have a positive economic impact through the delivery of employment-generating industrial and commercial floor space on the site which will result in investment and economic benefit for Sydney as well as the wider region.

The potential impacts can be mitigated, minimised or managed through the measures discussed in detail within **Appendix C.**

7.6. SUITABILITY OF THE SITE

The site is considered highly suitable for the proposed development for the following reasons:

- The warehouse and distribution centre use in permitted in the E4 zone and is consistent with the relevant zone objectives, providing a wide range of industrial and warehouse land uses and delivering employment opportunities, while minimising adverse effects on other land uses.
- The development satisfactorily addresses the relevant provisions in SLEP 2012 and SDCP 2012, including acoustic amenity, built form and setbacks, car parking and landscaping. Notably the proposal is compliant with key built form controls (height of buildings and floor space ratio).
- The site is located within an existing industrial area and the character and scale of the development is compatible and consistent with its context, avoiding unacceptable impacts on residential amenity.
- The site is highly accessible to both the transport and regional freight network and the rail network and makes use of a brownfield site to deliver sustainable development.

7.7. PUBLIC INTEREST

The proposed development is considered in the public interest for the following reasons:

- The proposal is consistent with relevant State and local strategic plans and satisfactorily addresses the relevant State and local planning controls.
- No adverse environmental, social, or economic impacts will result from the proposal.
- The proposal will provide 684 jobs during the construction phase and over 425 jobs once fully operational.
- The proposal will stimulate local investment and contribute significant economic output and value add to the economy each year.
- The project is fully funded and 'shovel ready' for commencement of construction as soon as possible following approval.
- The issues identified during the stakeholder engagement have been addressed through the development of the design of the proposal and the assessment of the impacts of the project.

Having considered all relevant matters, we conclude that the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

DISCLAIMER

This report is dated 20 December 2024 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd **(Urbis)** opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Goodman Property Services (Australia) Pty Ltd **(Instructing Party)** for the purpose of Amendment Report **(Purpose)** and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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

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

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

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

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

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APPENDIX B ARCHITECTURAL PLANS

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