ENVIRONMENTAL IMPACT STATEMENT

74 Edinburgh Road, Marrickville

Prepared for
WOOLWORTHS
19 October 2020

URBIS

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

Director	Jennifer Cooper
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Project Code	P0019077
Report Number	P0019077_Final

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CONTENTS

FIGURES

PICTURES

TABLES

ACKNOWLEDGEMENT OF COUNTRY

We acknowledge the Traditional Owners of country throughout Australia and recognise their continued connection to land, water and culture. We pay our respects to their Elders past, present and emerging.

The traditional Aboriginal groups of within the Inner West Council area are the Gadigal and Wangal peoples of the Eora Nation.

SIGNED DECLARATION

SUBMISSION OF ENVIRONMENTAL IMPACT STATEMENT

This Environmental Impact Statement has been prepared in accordance with Schedule 2 of the *Environmental Planning and Assessment Regulations 2000.*

Environmental Assessment prepared by:

Names:	Jennifer Cooper, Director Urbis Pty Ltd (Bachelor of Town Planning) Danielle Blakely, Associate Director Urbis Pty Ltd (Bachelor of Science, Master of Urban and Regional Planning) Charlotte Ryan, Consultant Planner Urbis Pty Ltd (Bachelor of Planning)
Address:	Urbis Pty Ltd Level 8, 123 Pitt Street Sydney NSW 2000
In respect of:	SSD-10468 – Woolworths Waterhouse and Distribution Centre, Marrickville

Applicant and Land Details:

Applicant:	Woolworths Group Limited
Applicant address	1 Woolworths Way, Bella Vista, New South Wales 2153
Land to be developed:	74 Edinburgh Road, Marrickville
Legal description:	Lot 202 in DP 1133999, Lot 3 in DP 318232 and Lot 3 in DP 180969
Project Summary	Construction and 24/7 operation of a warehouse and Customer Fulfillment Centre (CFC) comprising: ▪ Demolition of existing buildings associated structures and landscaping; ▪ Construction of a two storey warehouse comprising a speculative warehouse at level 1 (ground level) and Customer Fulfillment Centre (CFC) at level 2; ▪ Construction of associated offices across five levels to be used by WooliesX, a business unit within Woolworths Group Limited, in conjunction with the warehouse and CFC; ▪ Two storey car park adjacent to Edinburgh Road; ▪ Two storey hardstand loading / delivery area adjacent Sydney Steel Road; ▪ Private vehicle access from two points on Edinburgh Road; ▪ Heavy vehicle / loading vehicle access from four points on Sydney Steel Road; and,

Applicant:	Woolworths Group Limited ▪ Tree removal and landscaping works.

Declaration:

- We certify that the contents of the Environmental Impact Statement, to the best of our knowledge, has been prepared as follows:
- In accordance with the requirements of the *Environmental Planning and Assessment Act 1979, Environmental Planning and Assessment Regulation 2000,* and *State Environmental Planning Policy (State and Regional Development) 2011*;
- Containing all available information that is relevant to the environmental assessment of the development, activity or infrastructure to which the statement relates; and
- The information contained in this report is true in all material particulars and is not misleading.

Name/Position:	**Jennifer Cooper, Director**	**Danielle Blakely, Associate Director**	**Charlotte Ryan, Consultant**
Signature:			
Date:	22/09/2020	22/09/2020	22/09/2020

GLOSSARY AND ABBREVIATIONS

Abbreviation	Meaning
ACHA	Aboriginal Cultural Heritage Assessment
AHIMS	Aboriginal Heritage Information Management System
AS	Australian Standard
ASS	Acid Sulfate Soils
BC Act	Biodiversity Conservation Act 2016
BCA	Building Code of Australia
BDAR	Biodiversity Assessment Report
CMP	Construction Management Plan
Council	Inner West Council
CPTED	Crime Prevention Through Environmental Design
CPTMP	Construction Parking and Traffic Management Plan
District Plan	Eastern City District Plan
DPIE/Department	NSW Department of Planning, Industry and Environment
DP	Deposited Plan
DSI	Detailed Site Investigation
EIS	Environmental Impact Statement
EPA	NSW Environment Protection Authority
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
ESD	Ecologically Sustainable Development
Infrastructure SEPP	State Environmental Planning Policy (Infrastructure) 2007.
GANSW	NSW Government Architect's Office
HIS	Heritage Impact Statement
HMS	Hazardous Materials Survey
IMP	Infrastructure Management Plan
LGA	Local Government Area
m	metre
NIA	Noise Impact Assessment
Marrickville LEP 2011	Marrickville Local Environmental Plan 2011
OEH	Office of Environment and Heritage
OWMP	Operational Waste Management Plan
PSI	Preliminary Site Investigation
Region Plan	A Metropolis of Three Cities – Greater Sydney Region Plan

Abbreviation	Meaning
RAP	Remediation Action Plan
RAPs	Registered Aboriginal Parties
RMS	Roads and Maritime Services
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SEPP 55	State Environmental Planning Policy No.55 – Remediation of Land
sqm	Square Metres
SSD	State Significant Development
SEPP SRD	State Environmental Planning Policy (State and Regional Development) 2011
SSDA	State Significant Development Application
TfNSW	Transport for New South Wales
The Minister	The Minister for Planning, Industry and Environment
The Regulation	Environmental Planning and Assessment Regulation 2000
The Site	The new warehouse and distribution centre site
TPZ	Tree Protection Zone
Transport Strategy	Future Transport Strategy 2056
WSUD	Water Sensitive Urban Design

EXECUTIVE SUMARY

This Environmental Impact Statement (**EIS**) has been prepared to accompany a State Significant Development Application (**SSDA**) for the construction of a warehouse and distribution facility and associated offices at 74 Edinburgh Road, Marrickville (**the Site**).

This EIS should be read in conjunction with the Secretary's Environmental Assessment Requirements (SEARs) dated 30 June 2020 and included at **Appendix A**, and the supporting technical documents provided at **Appendix B – Appendix JJ.**

The EIS has been prepared in accordance with and meets the minimum requirements of clauses 6 and 7 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (**the Regulation**) and contains an assessment of the proposal against the relevant considerations under Section 4.15 of the *Environmental Planning and Assessment Act 1979* (**EP&A Act**).

THE SITE

The Site is located within the Inner West Local Government Area (**LGA**). The Site is situated approximately 5.5km south-west of Sydney CBD and approximately 2.9km north-east of Sydney International Airport within the suburb of Marrickville.

The Site is legally described as Lot 202 in DP 1133999, Lot 3 in DP 318232 and Lot 3 in DP 180969, commonly known as 74 Edinburgh Road, Marrickville. The Site has an area of approximately 28,090sqm and has frontages to both Edinburgh Road (north) and Sydney Steel Road (east). The boundaries of the Site are illustrated at Figure 1. A Site Survey is submitted at **Appendix B.**

The Site is bisected by a Sydney Water easement which runs through the northern part of the Site from Sydney Steel Road to the east to the western adjoining Site, 76B Edinburgh Road.

Figure 1 Aerial view of Site

Source: Six Maps

BACKGROUND

The Site has development consent for a Masters home improvement centre of approximately 13,350sqm. On 23 October 2015, the Sydney East Joint Regional Planning Panel granted development consent to DA 2015/00168 which comprised the following works:

- Demolition of all existing structures on site and Torrens title subdivision of the site into two lots referred to as Lot 1 and Lot 2.
- Construction of a Masters home improvement store of approximately 13,350sqm, associated vehicle access, loading, on-grade car parking and landscaping on Lot 1.
- Construction of ten (10) industrial units varying from 348sqm to 635sqm, associated vehicle access, loading, on-grade car parking and landscaping on Lot 2.
- Vehicular access from both Edinburgh Road and Sydney Steel Road comprising:
  - The main customer vehicular entry and exit via a fourth signalised approach to the existing traffic signals at Edinburgh Road/Smidmore Street intersection from all directions.
  - Secondary customer entry and exit from Sydney Steel Road to the undercroft parking area.
  - Service vehicle exit via a ramp to Sydney Steel Road.
  - Service vehicle access to the receiving area from both directions via the ramp on Edinburgh Road.
- 466 car spaces including 8 accessible parking spaces located near the customer entry and 6 trailer bay parking spaces.

At present, DA 2015/00168 has not been physically commenced.

The current proposal seeks to maintain similar vehicular access arrangements to the previously approved development on the Site.

THE PROPOSAL

The SSDA will seek consent for:

- Demolition of the existing buildings, associated structures and landscaping;
- Construction of a two storey warehouse comprising:
  - a speculative warehouse at level 1 (ground level) which can be used as a single tenancy or divided into two separate warehouse tenancies ; and
  - Woolworths semi-automated Customer Fulfillment Centre (CFC) at level 2;
- Construction of associated office space across five levels to be used by CFC workers and WooliesX, a business unit within Woolworths Group Limited, in conjunction with the warehouse and CFC;
- Two storey car park adjacent to Edinburgh Road;
- Two storey hardstand loading and delivery area adjacent Sydney Steel Road;
- Private vehicle access from two points on Edinburgh Road;
- Heavy vehicle / loading vehicle access from four points on Sydney Steel Road; and,
- Tree removal and landscaping works.

Use of the warehouse will be on a 24-hour, 7-day basis, consistent with surrounding operations. Architectural Plans have been prepared by Nettleton Tribe and included at **Appendix C.** An Architectural Design Report is also included at **Appendix D.**

Figure 2 Photomontage of Proposed Development

Picture 1 The proposed development as viewed from Edinburgh Road, looking east.

Source: Nettleton Tribe

Picture 2 The proposed development as viewed from Sydney Steel Road, looking north.

Source: Nettleton Tribe

PROJECT NEEDS AND BENEFITS

With the growth of technology and a change in consumer trends, Woolworths have experienced a significant increase in the growth of online orders with online sales consistently increasing by approximately 17% each year. The recent COVID-19 pandemic has further exacerbated this with online orders increasing by more than 35% since early 2020.

Woolworths Group Limited have sought to respond to these world circumstances and consumer trends by finding innovative ways to provide additional and faster delivery services across Sydney. The proposed warehouse and CFC seek to directly respond to current social and economic circumstances by facilitating faster and more reliable online delivery services.

Woolworths Group Limited have looked at a number of properties in Sydney over recent years however there have been no other suitable freehold opportunities that have come to market with leasehold

opportunities beyond 15 years. With the cost of the automation fit out of the CFC, the establishment of the facility is a long-term commitment to the Site, which they are in ownership of and is positioned for redevelopment.

It is proposed to relocate the existing Mascot Woolworths warehouse and CFC to the Site, primarily to capitalise on existing and future transport infrastructure servicing the Site and by locating the development in a location closer to online customers that is easily accessible to Sydney's north, south, east and west. This will enable faster delivery services to online shoppers and supermarkets and reduce travel distances for the delivery of online goods, resulting in an overall reduction of carbon emissions from delivery vehicles.

The proposed Site is highly suited to the proposed warehouse and CFC given it is owned by Woolworths Group Limited, is not subject to a short-term lease and is in close proximity to regional road networks and existing infrastructure.

More broadly, the proposal seeks to achieve the following:

- Provide growth and investment in an identified industrial precinct with high levels of accessibility;
- Provide a warehouse and distribution facility that will stimulate economic activity;
- Generate additional employment opportunities and provide new jobs within the Sydenham to Bankstown Urban Renewal Corridor;
- Provide a purpose-built warehouse and distribution facility for Woolworths Group Limited;
- Provide additional commercial office space in association with the Woolworths CFC to co-locate related business operations;
- Meet the growing demand for online groceries;
- Provide faster and more flexible delivery options for customers and supermarkets;
- Enable Woolworths to better manage inventory and their online store;
- Deliver online orders to Woolworths' customers in a timely manner;
- Relieve local supermarkets from having to store additional stock; and,
- Keep up with customer demands for express delivery and click and collect.

CONSULTATION

Consultation was undertaken with a range of State authorities, services providers and members of the community during the preparation and assessment of the EIS. The following agencies have also been consulted in the preparation of this development application as required by the SEARs:

- Inner West Council;
- Sydney Water;
- Fire and Rescue NSW;
- Transport for NSW;
- Sydney Metro;
- Ausgrid;
- NSW Food Authority; and,
- The Environment, Energy and Science Group.

Various strategies were implemented to ensure collaborative community involvement in the project, including emails to subscribers and stakeholders, stakeholder briefings, website information, letter box drops and community information sessions. A Consultation Strategy has been prepared by Urbis and included at **Appendix E.**

PLANNING FRAMEWORK

The proposed development has an estimated capital investment value of $129 million, with the warehouse and distribution component of the development having a CIV of $45,053,274 (see **Appendix F**). It is therefore considered SSD pursuant to Schedule 1, Clause 12 of *State Environmental Planning Policy (State and Regional Development) 2011* (**SRD SEPP**). The NSW Minister for Planning is the consent authority for this proposal under Section 8A of the SRD SEPP.

KEY PLANNING ASSESSMENT

This EIS has addressed the SEARs requirements issued for the development and includes an assessment against the relevant environmental planning instruments, policies, and guidelines and demonstrates that the proposed development does not result in any significant departures from applicable controls or unreasonable environmental effects.

The general and key impacts resulting from the proposed development are outlined in detail in the EIS. Key impacts resulting from the proposed development include:

- Built form and urban design;
- Visual impact;
- Heritage;
- Overshadowing;
- Traffic, parking and access;
- Biodiversity and tree removal;
- Waste management;
- Flooding and stormwater;
- Noise and vibration;
- Air quality and odour
- Solar reflectivity;
- ESD;
- Crime and Safety;
- Access;
- Contamination and hazardous materials;
- Construction impacts; and,
- Consultation.

In considering each of the above key planning issues and potential impacts associated with the development, the EIS outlines the proposed mitigation measures to address each of these matters. Each of these outstanding impacts have been addressed within this EIS.

CONCLUSION

Overall, the proposed development sought within the detailed SSDA is considered appropriate for the Site and warrants approval for the following reasons:

- The proposal contributes to the achievement of the objectives for development within the Eastern City District as outlined within the relevant strategic plans and policies.
- The proposal results in an orderly and economic use of the land that leverages significant NSW Government investment in public transport to the Site, specifically the new Sydenham Metro Station.

- The proposal supports 30,732sqm of industrial GFA and 8,361m² of commercial GFA which is capable of contributing to the employment targets of the Eastern City District by delivering 660 operational jobs and 361 direct construction jobs.
- The proposal satisfies the applicable State planning policies and relevant environmental planning instruments that apply to the site.
- The proposed warehouse use is permitted with consent. Whilst commercial office is not strictly permissible in the IN1 General Industrial Zone, consent is sought for the proposed office component in accordance with Clause 4.38 (3) of the EP&A Act.
- The proposal will not have any unacceptable environmental impacts, as follows:
  - The proposal presents an appropriate built form in an industrial zoned area.
  - The proposal has no unacceptable traffic impacts.
  - The proposal minimises pedestrian and vehicle conflicts.
  - The proposal is sympathetic to nearby sensitive residential receivers and heritage items.
  - The proposal respects the industrial history and character of the place and will not obstruct or impact the vicinity heritage items in any way.
  - The proposal will have minimal visual impact from key locations in the public domain.
  - The proposal is consistent with the surrounding character and has a positive visual impact due to its site coverage, generous setbacks, location of car parking, high quality landscaping along public roads, façade design, building articulation and high-quality materials.
  - The proposal will not cause additional overshadowing to sensitive residential receivers or public domain areas.
  - The proposal is unlikely to have a significant impact on biodiversity values.
  - The proposal is unlikely to cause adverse solar glare to motorists, train drivers, pilots, pedestrians, and occupants of adjoining buildings.
  - The proposal is capable to not give rise to significant air quality and odour impacts during the construction and operational phases of the development.
  - Subject to adhering to the proposed mitigation measures, the proposal will have an acceptable noise impact during construction and operation.
  - The proposed development will have no significant impact on current flood volumes, flood depths and existing flood hazard categories up to the 1% AEP storm event.
  - The proposal is not classified as potentially hazardous and the Site can be made suitable for the proposed development.
  - The proposal satisfies the SEARs as demonstrated in this EIS and accompanying specialist reports.

In view of the above, it is submitted that the proposal is in the public interest and should be approved subject to appropriate consent conditions.

1. INTRODUCTION

This Environmental Impact Statement (**EIS**) has been prepared to accompany a State Significant Development Application (**SSDA**) which seeks consent for the construction of a warehouse facility and associated offices at 74 Edinburgh Road, Marrickville (**the Site**).

This report has been prepared by Urbis Pty Ltd on behalf of Woolworths Group Limited, the applicant of the SSDA. The proposed development is classified as 'State Significant Development' (**SSD**) pursuant to Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* (**SRD SEPP**).

This EIS is submitted to the NSW Department of Planning, Industry and Environment (**DPIE**) pursuant to part 4 of the *Environmental Planning and Assessment Act 1979* (**EP&A Act**). The Minister for Planning, or their delegate, is the consent authority for the detailed SSDA.

This report has been prepared in response to the requirements contained within the Secretary's Environmental Assessment Requirements (**SEARs**) dated 30 June 2020 included within **Appendix A**, and should be read in conjunction with the supporting documents provided at **Appendix B - Appendix JJ**.

1.1. PROJECT OVERVIEW

The SSDA seeks approval for the detailed design, construction, and operation of a two storey warehouse comprising a speculative warehouse at level 1 (ground level) and Customer Fulfillment Centre (**CFC**) at level 2. The proposed development also seeks consent for the construction of associated offices across five levels to be used by the warehouse tenants and WooliesX, a business unit within Woolworths Group Limited, in conjunction with the warehouse and CFC.

In summary, the SSDA seeks consent for:

- Demolition of the existing buildings, associated structures and landscaping;
- Construction of a two storey warehouse comprising a speculative warehouse at level 1 (ground level) and Customer Fulfillment Centre (CFC) at level 2;
- Construction of associated offices across five levels to be used by Woolworths in conjunction with the warehouse and CFC;
- Two storey car park adjacent to Edinburgh Road;
- Two storey hardstand loading and delivery area adjacent Sydney Steel Road;
- Private vehicle access from two points on Edinburgh Road;
- Heavy vehicle / loading vehicle access from four points on Sydney Steel Road; and,
- Tree removal and landscaping works.

Use of the warehouse will be on a 24-hour, 7-day basis, consistent with surrounding operations.

Detailed architectural plans have been prepared by Nettleton Tribe and included at **Appendix C.**

1.2. PROJECT OBJECTIVES

The proposal will facilitate the construction of a warehouse and distribution facility with associated offices. The development seeks to:

- Provide growth and investment in an identified industrial precinct with high levels of accessibility;
- Provide a warehouse and distribution facility that will stimulate economic activity;
- Generate additional employment opportunities and provide new jobs within the Sydenham to Bankstown Urban Renewal Corridor;
- Provide a purpose-built warehouse and distribution facility for Woolworths Group Limited;
- Provide additional commercial office space in association with the Woolworths CFC;

- Meet the growing demand for online groceries;
- Provide faster and more flexible delivery options for customers and supermarkets;
- Enable Woolworths to better manage inventory and their online store;
- Deliver online orders to Woolworths' customers in a timely manner;
- Relieve local supermarkets from having to store additional stock; and,
- Keep up with customer demands for express delivery and click and collect.

The location of the development is highly suited to the proposed warehouse and CFC given its proximity to regional road networks and existing infrastructure.

1.3. REPORT STRUCTURE

The EIS provides the following sections:

- **Section 2**: provides background of the proposal and relevant approvals in relation to the Site.
- **Section 3:** A description of the Site and surrounding context, including identification of the Site, existing development on the site and surrounding development.
- **Section 4:** a detailed description of the proposed development.
- **Section 5:** details the community and stakeholder engagement undertaken by the applicant as part of the preparation of this EIS.
- **Section 6:** details the strategic context including the planning policies and guidelines relevant to the site and the proposal.
- **Section 7**: provides a detailed assessment of the State, regional and local strategic planning policies and the development contributions framework.
- **Section 8:** provides a comprehensive assessment of the existing environment, potential impacts, and mitigation measures for each of the key criteria in the SEARs.
- **Section 9:** lists the recommendations and mitigation measures based on the technical studies undertaken as part of this application.
- **Section 10:** provides concluding statements and a recommendation for determination of the application.

1.4. SECRETARY ENVIRONMENTAL ASSESSMENT REQUIREMENTS

A request was made to the Minister for the issuance of SEARs, pursuant to clause 3(1), Part 2, Schedule 2 of the Regulation. SEARs were subsequently issued on 30 June 2020 (**Appendix A**) and have informed the preparation of this EIS and supporting technical documents. A summary of the SEARs and Applicant response is provided in **Appendix A.**

1.5. SEAR SUBMISSIONS

As part of the SEARs request, a number of submissions were received from relevant public authorities. A summary of the SEAR submissions and Applicant response is provided in **Appendix A.**

2. BACKGROUND

2.1. MASTERS HOME IMPROVEMENT CONSENT (DA 2015/00168)

The Site has development consent for a Masters home improvement centre of approximately 13,350sqm. On 23 October 2015, the Sydney East Joint Regional Planning Panel granted development consent to DA 2015/00168 (**Masters DA**) which approved the following:

- Demolition of all existing structures on site and Torrens title subdivision of the site into two lots referred to as Lot 1 and Lot 2.
- Construction of a Masters home improvement store of approximately 13,350sqm, associated vehicle access, loading, on-grade car parking and landscaping on Lot 1.
- Construction of ten (10) industrial units varying from 348sqm to 635sqm, associated vehicle access, loading, on-grade car parking and landscaping on Lot 2.
- Vehicular access from both Edinburgh Road and Sydney Steel Road comprising:
  - The main customer vehicular entry and exit via a fourth signalised approach to the existing traffic signals at Edinburgh Road/Smidmore Street intersection from all directions.
  - Secondary customer entry and exit from Sydney Steel Road to the undercroft parking area.
  - Service vehicle exit via a ramp to Sydney Steel Road.
  - Service vehicle access to the receiving area from both directions via the ramp on Edinburgh Road.
- 466 car spaces including 8 accessible parking spaces located near the customer entry and 6 trailer bay parking spaces.
- Removal of 83 trees.

At present, DA2015/00168 has not been physically commenced.

The current proposal seeks to maintain similar vehicular access arrangements to the previously approved home improvement centre.

2.2. OTHER APPROVALS

A summary of past development consents applying to the land is provided below.

Table 1 History of past DA consents

Application Number	Development Description	Determination
DA 2015/00168	To demolish existing improvements and Torrens title subdivision of the site into 2 allotments and construct and fit out a 13,350 sqm Masters Home Improvement store including vehicle access, loading, car parking and landscaping on Lot 1 and construct 10 industrial units varying from 348 sqm to 635 sqm including vehicle access, loading, car parking and landscaping on Lot 2.	Approved 23/10/2015
DA 2017/00212	To demolish existing improvements and for the construction and operation of a "click and collect facility" with associated car parking and signage.	Approved 8/09/2017
DA 2016/00022	To install an advertising panel on a bus shelter to be erected on Edinburgh Road adjacent to 2 Bourne Street.	Approved 29/02/2016

Application Number	Development Description	Determination
DA 2017/00305	To subdivide the existing 2 lots into 3 lots to allow the additional lot to contain a sub-surface stormwater culvert.	Approved 5/09/2017

3. SITE ANALYSIS

3.1. SITE CONTEXT AND LOCATION

The Site is located within the suburb of Marrickville, which falls within the Inner West Local Government Area (**LGA**). The Site is also located within the Sydenham Station Precinct which is part of the Sydenham to Bankstown Urban Renewal Corridor. The precinct borders the suburbs of Marrickville to the north and west, St Peters to the east and Tempe to the south.

An overview of the site characteristics is provided below. Photos of the site and surrounds are also provided in Figure 4 and Figure 6.

Figure 3 Aerial view of Site

Source: Urbis

3.2. LEGAL DESCRIPTION

The Site is legally described as Lot 202 in DP 1133999, Lot 3 in DP 318232 and Lot 3 in DP 180969, commonly known as 74 Edinburgh Road, Marrickville (refer to Survey Plan submitted at **Appendix B**). The Site has an area of approximately 28,090sqm (including 514sqm of land acquisition for road widening along Edinburgh Road) and has frontages to both Edinburgh Road (north) and Sydney Steel Road (east) as identified in Figure 3.

A number of easements are registered on the property title including:

- Sewerage easement running diagonally from the eastern corner to the western corner of the Site.
- Electricity easement located in the mid-point of the allotment, including a right of way to the western boundary for access.

- Stormwater culvert and easement (being Lot 3 in DP 180969 and Lot 3 in DP318232) which runs horizontally through the northern portion of the Site. Lot 3 in DP 180969 and Lot 3 in DP318232. The stormwater culvert is owned by Woolworths with the easement benefitting Sydney Water.

3.3. EXISTING DEVELOPMENT

The Site is located within the industrial area of Marrickville and currently accommodates three large freestanding industrial buildings, three smaller buildings and associated car parking and loading areas. The Site has been subject to multiple stages of industrial development since initial occupation and as such the built improvements across the Site has been progressively developed with warehouse buildings developed on the Site in an *ad hoc* configuration (see Figure 4).

The Site includes a 'Return and Earn' facility adjacent to Edinburgh Road, which is well utilised and includes a parking area for people using this facility.

Figure 4 Photographs of the Existing Site

Picture 3 Vehicular access to the Site from Edinburgh Road

Source: Urbis

Picture 4 The Site as viewed from Edinburgh Road

Source: Urbis

Picture 5 The existing recycling facility at the front of the Site, adjoining Edinburgh Road.

Source: Urbis

Picture 6 The Site as viewed from Sydney Steel Road

Source: Urbis

Picture 7 The existing Site

Source: Urbis

Picture 8 Vehicular access to the Site from Sydney Steel Road

Source: Urbis

3.4. SURROUNDING DEVELOPMENT

The Site is well positioned in terms of access to arterial and main roads, public transport modes of bus and rail and the retail centre of Marrickville. The Site is located on the northern periphery of the Sydenham industrial lands within Marrickville LGA, which stretches from the airport in the south. This forms part of a large industrial precinct approximately bounded by Edinburgh Road to the north, Railway Parade and the railway line to the east, Marrickville Road/the railway line to the south and Meeks Road/Farr Street/Shepherd Street to the west.

Figure 5 Local Context Map

Source: Urbis

The Industrial precinct includes the following:

- Large free stranding industrial buildings.
- Industrial estates including smaller individual warehouse buildings to the south and east.
- Manufacturing, freight and logistics uses and includes storage facilities, car smash repairs, warehousing and factories.

The Marrickville Metro retail development lies to north of the site. Residential uses are well separated from the Site to the south and east (see Figure 6). There is also physical separation physically from housing to the north west of the Site on the northern side of Edinburgh Road. The Site is also located approximately 800metres from Sydenham Railway Station. Details of the transport network which services the Site are outlined further below in **Section 3.7**.

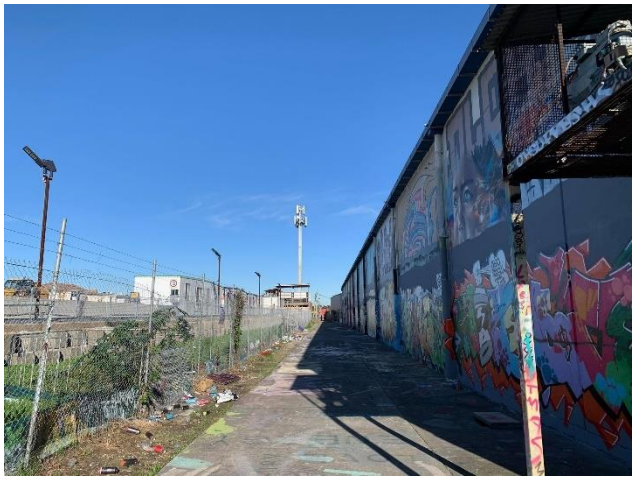
Figure 6 Photographs of Surrounding Development

Picture 9 Development to the north on the corner of Edinburgh Road and Sydney Steel Road.

Source: Urbis

Picture 10 Low density residential dwellings to the north along Bourne Street.

Source: Urbis



Picture 11 Existing pedestrian through-site link connecting Sydney Steel Road to Sydenham Road.

Source: Urbis

Picture 12 Southern end of Sydney Steel Road.

Source: Urbis

3.5. TOPOGRAPHY

The Site is relatively flat with a gentle slope of approximately 2.3m from the Edinburgh Road frontage (RL 5.14) to the rear of the Site (RL 2.75).

3.6. BUILT HERITAGE

The Site is not heritage listed or located within a heritage conservation area under the *Marrickville Local Environmental Plan 2011* (MLEP 2011). The Site is located in proximity to several local and state-listed heritage items, as illustrated in Figure 7. The local and state heritage items of particular significance to the proposal are detailed in Table 2 below.

Potential impacts of the development on the surrounding heritage items have been carefully considered in the detailed design of the proposal to ensure the built form and heritage significance of these items continues to be appreciated and enjoyed. These potential impacts have been discussed in further detail in **Section 8.3** of this EIS and within the Heritage Impact Assessment submitted at **Appendix G.**

Figure 7 Surrounding Heritage Items

Source: Urbis / MLEP 2011

Table 2 Surrounding Heritage Items

Item	Name and Address	Significance	Description
I81	Garden Street, Marrickville	State	Flood storage reserve and brick drain (Sydenham Pit and Drainage Pumping Station 1)
I98	Sections of Juliett Street, Llewellyn Street, Enmore Road, Victoria Road, Bourne Street, Lynch Avenue and Murray Street	Local	Brick paving

Item	Name and Address	Significance	Description
I125	12 Leicester Street, Marrickville	Local	Stead House (circa 1850s, also known as Frankfort Villa and Waterloo Villa), including interior
I124	34 Victoria Road, Marrickville	Local	Mill House, including interiors
I280	1–7 Unwins Bridge Road, St Peters	Local	Waugh & Josephson industrial buildings former—Inter-war Functionalist Showroom and offices and workshop, including interiors
I175	Enmore Road, Marrickville	Local	Enmore Park and entry gates and Port Jackson fig trees
C14	Llewellyn Estate Heritage Conservation Area	Local	

3.7. TRANSPORT AND ACCESSIBILITY

3.7.1. Public Transport

Rail

The Site currently benefits from proximal access to the Sydney train network, being centrally located between St Peters Station and Sydenham Station.

Sydenham Station is located approximately 800m south-east of the Site. Sydenham Station is currently serviced by 8 trains an hour in the morning peak. It is located on the Illawarra line and is served by Sydney Trains T3 Bankstown, T4 Illawarra and T8 South services.

The Sydney Metro City & Southwest Project will upgrade and convert all 11 stations between Sydenham and Bankstown to Sydney Metro standards. After the conversion, metro trains from Bankstown will run at least every four minutes in the peak, or 15 trains an hour, almost doubling the existing level of service. The station will be upgraded to Sydney Metro standards whilst existing platforms 3, 4, 5 and 6 will continue to be used by trains operating on the Sydney Trains network.

In addition, St Peters Station is located approximately 1km east of the Site and is also located on the Illawarra line. It is served by Sydney Trains T3 Bankstown line services. It does not form part of the Sydney Metro rail corridor and existing service is proposed to be maintained. Refer to Traffic and Transport Impact Assessment prepared by Colston Budd Rogers & Kafes CBRK) included at **Appendix H.**

Bus

Bus services currently operate along Edinburgh Road, with bus stops located directly outside the Site frontage. Bus route 355 provides direct services between Marrickville and Bondi Junction via Moore Park and Erskineville.

3.7.2. Road Network

The Site has frontage to Sydney Steel Road and Edinburgh Road. Sydney Steel Road runs south from Edinburgh Road at an un-signalised intersection controlled by give way signs, with Edinburgh Road having priority.

Sydney Steel Road is a dead end south of Edinburgh Road. It provides access to industrial properties, including the Site and the Sydney Metro Marrickville dive site. It provides for two-way traffic with parking permitted on both sides and is signposted as a bicycle route.

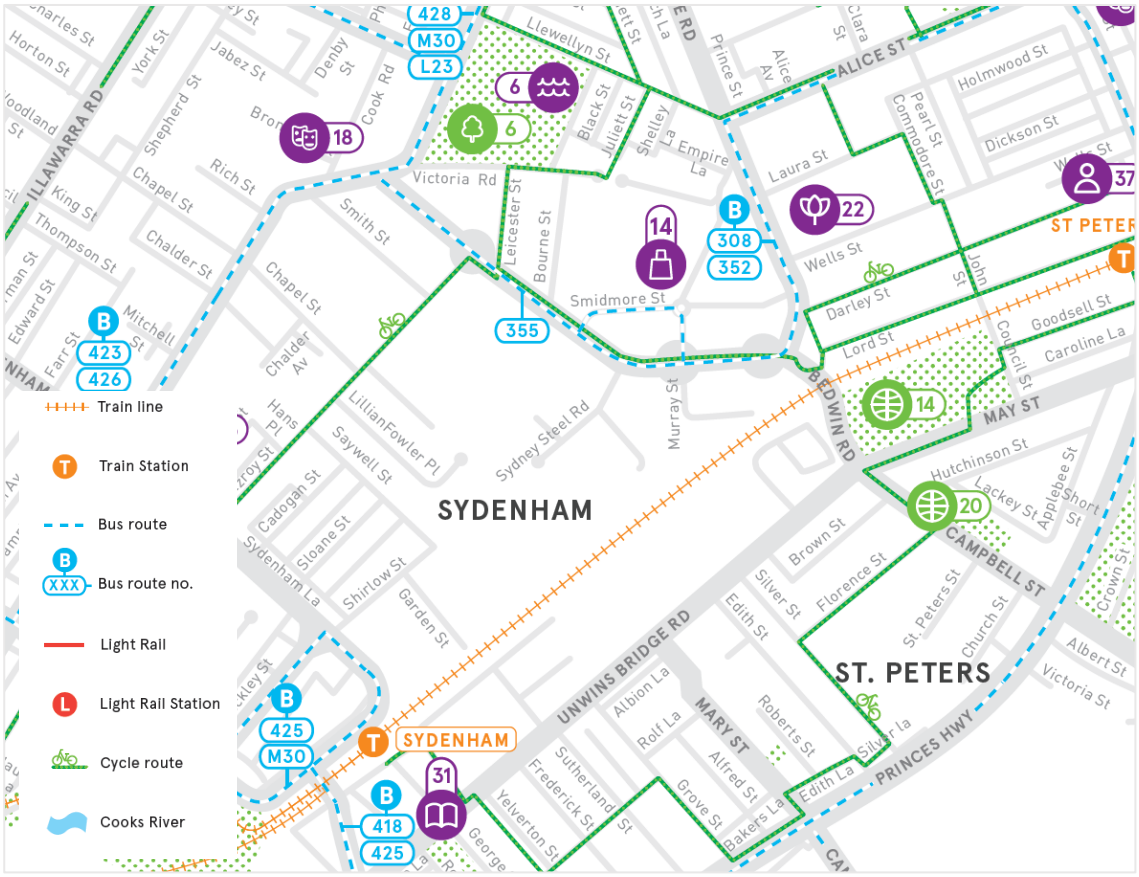
Edinburgh Road provides one traffic lane and one parking lane in each direction, clear of intersections. It has a shared pedestrian and cycle path along the site frontage. It provides access to industrial and residential properties. There are bus stops on both sides of the road, close to the site

3.7.3. Pedestrian and Cycle Network

There is an existing off-road pedestrian and cycle path on Edinburgh Road, adjacent to the Site. A plan showing cycle routes is provided in **Appendix H.**

There is a pedestrian link which connects to Sydenham Station, south of Sydney Steel Road. The intersection of Smidmore Street with Edinburgh Road includes signalised crossings of Edinburgh Road and Smidmore Street.

Figure 8 Existing Cycle Network



Source: Inner West Council

3.8. UTILITIES AND INFRASTRUCTURE

The Site is located within an established urban area and currently contains all necessary services including electricity, gas, water, communications, drainage and sewerage. Furthermore, future development on the Site can be connected to these services when required.

4. PROPOSED DEVELOPMENT

4.1. DESCRIPTION OF THE PROPOSAL

The SSDA proposes the construction of a new two storey warehouse comprising a Customer Fulfillment Centre (**CFC**) and speculative warehouse with associated offices. The proposed development will deliver economic benefits and employment generation for the Inner West and Eastern City District.

A CFC, commonly referred to as a 'dark store,' is a warehouse where online grocery orders are received, stored and dispatched from the facility to customers' homes. Operations will include preparation of delicatessen items, baked products, fresh fruit and vegetables, receipt of fresh meat products and dairy products (both prepared and packaged off-site). It will also include the sorting of customer orders for dispatch by the Woolworths Trucking Fleet.

Approval was previously granted for the construction and operation of a "click and collect facility" in 2017 (**DA 2017/00212**) and it is proposed to retain this approved use. There are a number of pick-up facilities that have been developed by Woolworths through-out the Sydney Metro area. The new CFC will include a dedicated pick-up facility for predominantly business customers, however this facility can also be used by domestic customers,. Customers who have pre-ordered and paid for their groceries via the Woolworths online portal can elect to 'Pick-Up' their order at any number of locations and spaces are proposed on this site to contribute to the Woolworths 'Pick-Up' location network. The customers prepare a shopping list, pay for the grocery items online and nominate a pick-up time. The order is then sorted to their requirements and conveyed to a temperature controlled the 'Pick-Up' facility for the customer to collect.

This application seeks consent only for the use of the ground floor of the development as a speculative warehouse. A tenant has not yet been confirmed however it will be occupied by a general industrial use permissible under the current IN1 General Industrial zoning of the Site and will be subject to a detailed fit-out DA. The future tenant will be consistent with the type of land uses that currently exist on the site which include a range of factory, warehouse, and general industrial uses.

Specifically, the SSDA seeks approval for:

- Demolition of the existing buildings, associated structures and landscaping;
- Construction and use of a two storey warehouse comprising a speculative warehouse at level 1 (ground level) and purpose built CFC at level 2;
- Construction and use of associated offices across five levels to be used by Woolworths in conjunction with the warehouse and CFC;
- Two storey car park adjacent to Edinburgh Road;
- Two storey hardstand loading and delivery area adjacent Sydney Steel Road;
- Private vehicle access from two points on Edinburgh Road;
- Heavy vehicle / loading vehicle access from four points on Sydney Steel Road; and,
- Tree removal and landscaping works.
- Use of the warehouse will be on a 24-hour, 7-day basis, consistent with surrounding operations.

4.2. NUMERIC OVERVIEW

The key numerical aspects of the proposed development are summarised below in Table 3.

Table 3 Numeric Overview of Proposed Development

Component	Proposal
Site Area	28,090sqm (including 514sqm of land acquisition for road widening along Edinburgh Road)

Component	Proposal
	Note. The total Site has an area of 28,090sqm. Upon completion of the proposed works, 514sqm will be dedicated to the road reserve to accommodate the proposed signalised intersection.
Gross Floor Area	CFC: 558m² CFC Warehouse: 21,000m² Office: 8,361m² Spec office: 596m² Spec warehouse: 8,578m² Total: 39,093m²
Building Height	Maximum height of warehouse: 27.45m Maximum height of office building (including plantroom): 32.32m
Setbacks	▪ Edinburgh Road (north): 3m ▪ Sydney Steel Road (east): Varies ▪ Rear setback (south): 400mm ▪ Side setback (west): 6m
Loading and Parking	▪ Total staff parking: 371 spaces – Accessible: 7 – Standard car: 317 – Spec warehouse (accessible): 1 – Spec warehouse (standard): 46 – Pick-up: 4 ▪ Van parking: 140 ▪ Bicycle parking: 106 spaces
Landscape Area	Total landscaped area: 1,445m² Tree canopy: 995m²
Operating Hours	24 hours, 7 days per week *Note. Pick-Up hours are anticipated to be between 7.00am to 10.00pm.*

4.3. LAND USE AND GFA

The proposal seeks approval for the use of the warehouse and CFC for a '***warehouse or distribution centre'*** as defined under the *Marrickville Local Environmental Plan 2011* (**MLEP 2011**). A commercial office space for use by the warehouse tenants is also proposed, as defined as a '***office premises,'*** under MLEP 2011.

The warehouse and office will be occupied by 'WooliesX,' a business unit within Woolworths Group Limited. The office will comprise WooliesX staff, contractors, supplier representatives as well as the Customer Fulfillment Centre (CFC) Management and Operational Team Members.

The development comprises the following:

- Warehouse, distribution facility and spec office – 30,732sqm
- Ancillary office space – 8,361sqm

As discussed throughout this EIS, the predominant land use on the Site is for the purpose of a warehouse and distribution centre which is consistent with the strategic objectives for the *Eastern City District Plan* (**District Plan**). A key priority of the District Plan is to retain and manage existing industrial land and safeguard it from competing pressures, such as residential and mixed-use zones.

The proposed office is ancillary and associated with the warehouse use and will assist in activating the industrial precinct and improving the interface with Edinburgh Road, Marrickville Metro and adjoining residential areas. The office uses have been specifically located at the front of the Site, at the intersection of Sydney Steel Road and Edinburgh Road to manage the visual interface between the warehouse and the different land use zoning on the northern side of Edinburgh Road.

The land uses are sufficiently and inextricably linked, as the WooliesX operations affect the performance of the CFC. The synergies between the two operations ensure real-time data is available for both ordering and the customer fulfilment to ensure that facility responds to demand and meets customer performance expectations.

The development yields a total GFA of 39,093m², approximately 78% which specifically relates to the warehouse and distribution facility. The Architectural Design Report at **Appendix D** includes a table which identifies the proposed land uses and a floor breakdown of GFA and total GFA.

4.4. BUILT FORM AND DESIGN

The proposed development is detailed in the Architectural Plans (**Appendix C**) and Design Report (**Appendix D**) prepared by Nettleton Tribe. The following sections of the EIS establish the design principles which underpin the detailed design of the development and provides a description of the key design elements.

4.4.1. Built Form and Layout

The Site has dual frontage to both Edinburgh Road (north) and Sydney Steel Road (east). The proposed layout and design have sought to improve activation to both frontages whilst allowing ease of operational access for delivery vehicles. The height, size, scale and setbacks of the development are comparable to surrounding industrial developments and provide a sympathetic presentation to the streetscape through landscape design, built form and materials.

The warehouse has been sited behind the office and at-grade parking area to minimise the perception of bulk and scale and improve the interface to Edinburgh Road and the residential areas to the north.

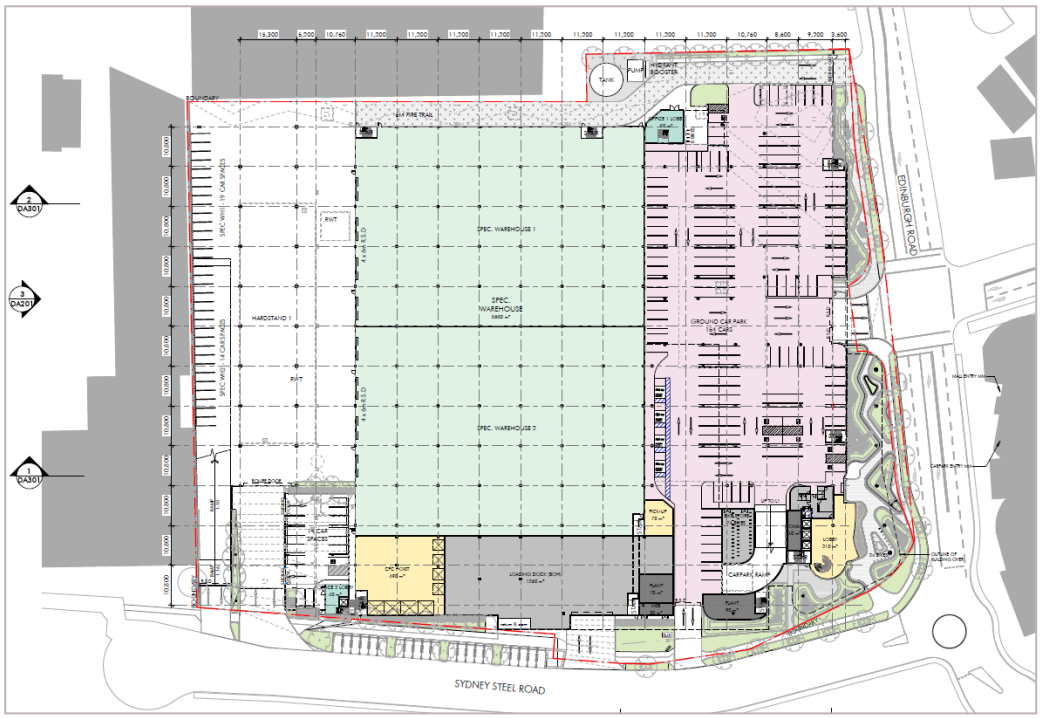
The speculative warehouse at level 1 and CFC at level 2 are simple in form and have a consistency of materials, finishes and colours to provide visual cohesion throughout the Site.

The warehouse comprises a large, two storey building (excluding mezzanine) with a maximum height of 27.45m. The warehouse is rectangular in shape and includes a speculative warehouse at ground level and CFC above with associated mezzanine.

A CFC hoist area is located at the south-west corner of the ground floor with two offices to service the speculative warehouse located above at level one overlooking the ground floor warehouse and accessed from Sydney Steel Road. The ancillary office is proposed across a six-storey building form located on the corner of Sydney Steel Road and Edinburgh Road. The remainder of the Site will comprise a mix of hardstand parking areas and deep soil landscaping.

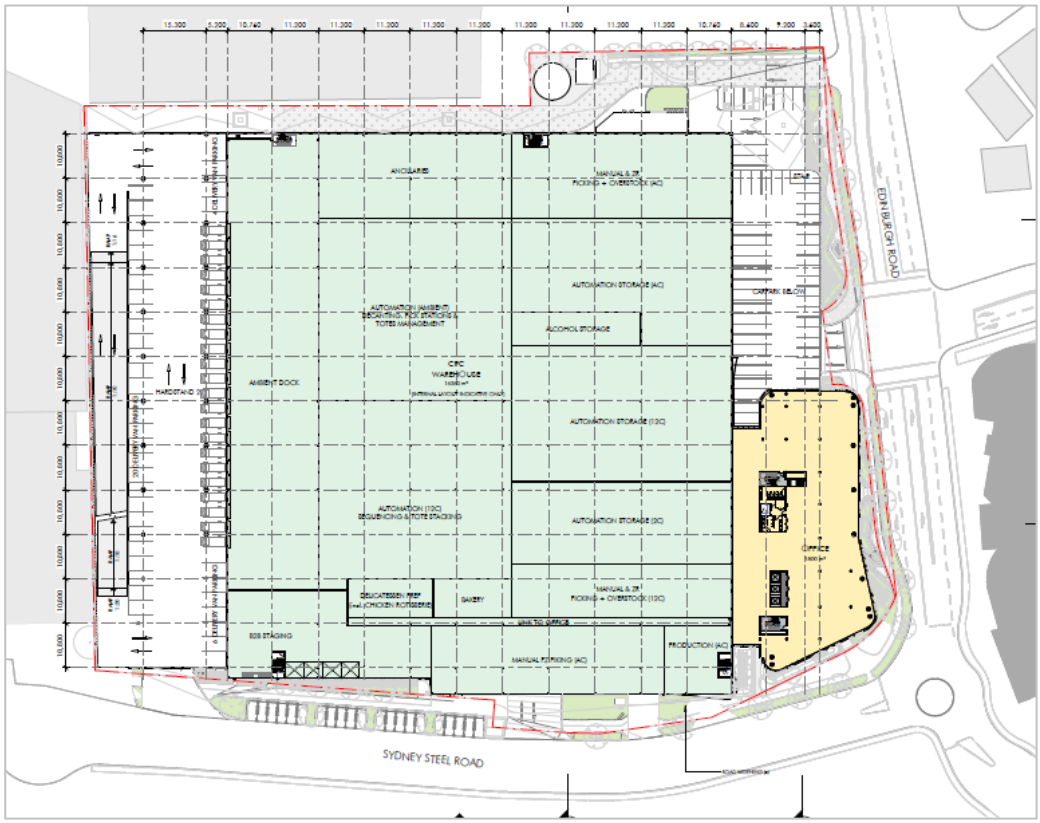
An extract of the ground floor plan and a floor by floor breakdown of each level is provided below.

Figure 9 Extract of ground floor plan



Source: Nettleton Tribe

Figure 10 Extract of Level 2 Floor Plan



Source: Nettleton Tribe

Table 4 Development Description

Level	Description
Ground Floor	▪ Spec warehouse (designed to operate as a single or dual warehouse space); ▪ CFC hoist; ▪ Office lobby to spec offices located on level one; ▪ Loading dock; ▪ Plant; ▪ Hardstand parking area for delivery vehicles; and, ▪ Pedestrian entrance to office lobby on corner of Sydney Steel and Edinburgh Road.
Level 1	▪ Speculative Warehouse ancillary Office 1 and 2; ▪ Hardstand parking area for staff; ▪ Mezzanine to warehouse below; and, ▪ Plant.
Level 2	▪ CFC warehouse; ▪ Office; and, ▪ Hardstand parking area for delivery vehicles.
Level 3	▪ Mezzanine to CFC; and, ▪ Office.
Level 4	▪ CFC Mezzanine; ▪ Office; ▪ Plant; and, ▪ Hardstand parking area for delivery van vehicles.
Level 5	▪ CFC Mezzanine; and, ▪ Office.
Level 6	▪ Office
Rooftop	▪ Plant; and, ▪ Outdoor roof terrace for staff.

4.4.2. Fit-out

Fit-out works to the CFC warehouse facility will predominately comprise the delivery and installation of the proprietary automated machinery and equipment. The machinery and equipment are expected to be delivered in shipping containers to the ground floor and contents unloaded.

Approximately 120 to 160 containers are expected to be delivered over the construction duration. Following delivery, the contents will be lifted by the tower crane and set down into level one of the warehouse, through a penetration in the lower roof, where the machinery and equipment will begin to be assembled. Once assembled in appropriately sized sections, the equipment will again be lifted, but via small internal cranes, into final positions on level two.

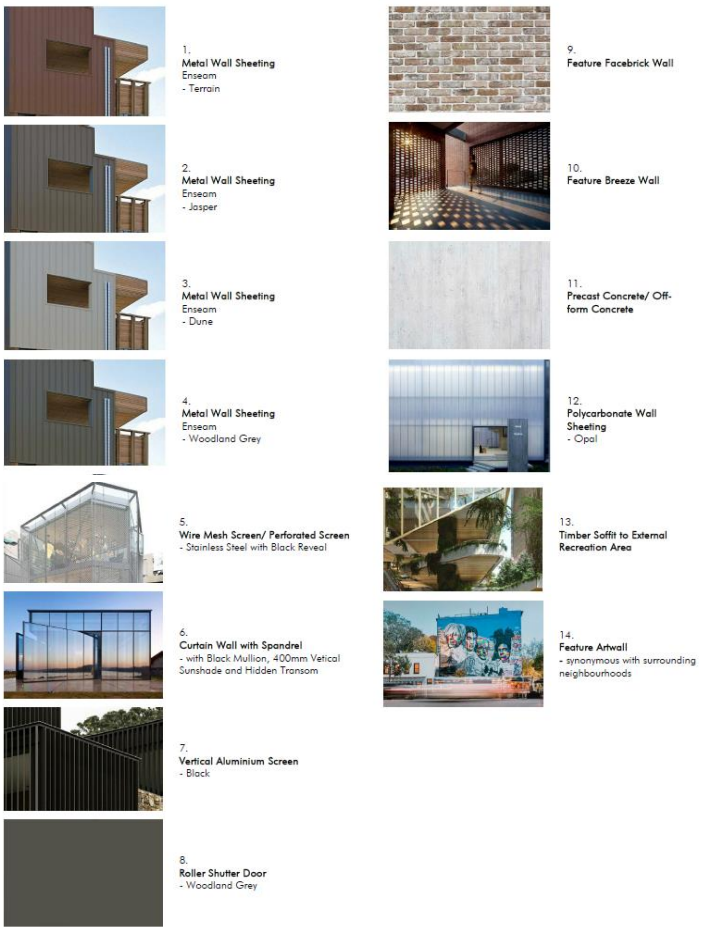
The fit out for the Ground Floor speculative warehouse(s) will be undertaken once tenants are secured for this space.

4.4.3. Materials and Finishes

The office component of the building is to be constructed from pre-cast concrete, wire mesh screening, vertical aluminium screening with a feature face brick wall at ground level. Floor to ceiling glass windows are also proposed. The entrance lobby to the office component is set back from Sydney Steel Road by vertical columns, landscaping and a feature 'breeze' wall to enhance the sense of human scale at the primary street frontage. The warehouse will comprise pre-cast concrete and metal wall sheeting.

The majority of the Site will comprise concrete paving where parking and manoeuvring will occur. At the front of the Site, a concrete/bitumen car park will be provided for general staff parking behind a landscaped setback.

Figure 11 Schedule of external materials and finishes



Source: Nettleton Tribe

4.4.4. Tree Removal and Landscaping

It is proposed to remove 23 high category trees and 9 low category trees. In addition, 55 trees high category trees and 28 low category trees will be removed that have previously been approved for removal under DA 2015/00168. This is discussed further in Section 8.6.1 and the Arborist Report included at **Appendix I.**

A landscaping scheme will be implemented and is detailed in the Landscape Plans and Report prepared by Site Image and included at **Appendix J**. The proposed landscaping is low maintenance and ensures that the design provides an attractive streetscape presentation. An extract from the Landscape Plan is provided in Figure 12.

The proposed landscaping scheme is underpinned by three key principles:

- **Community** – Create meaningful spaces that encourage social interaction.
- **Connectivity** - Provide important pedestrian connections which encourage walking & cycling.
- **Sustainability** – Promote environmentally sustainable design.

Landscaping within the two primary street frontages is proposed to enhance the streetscape and pedestrian experience along Edinburgh Road and Sydney Steel Road. Several trees are proposed along the Site perimeter, both within the Site boundary and along the public footpath.

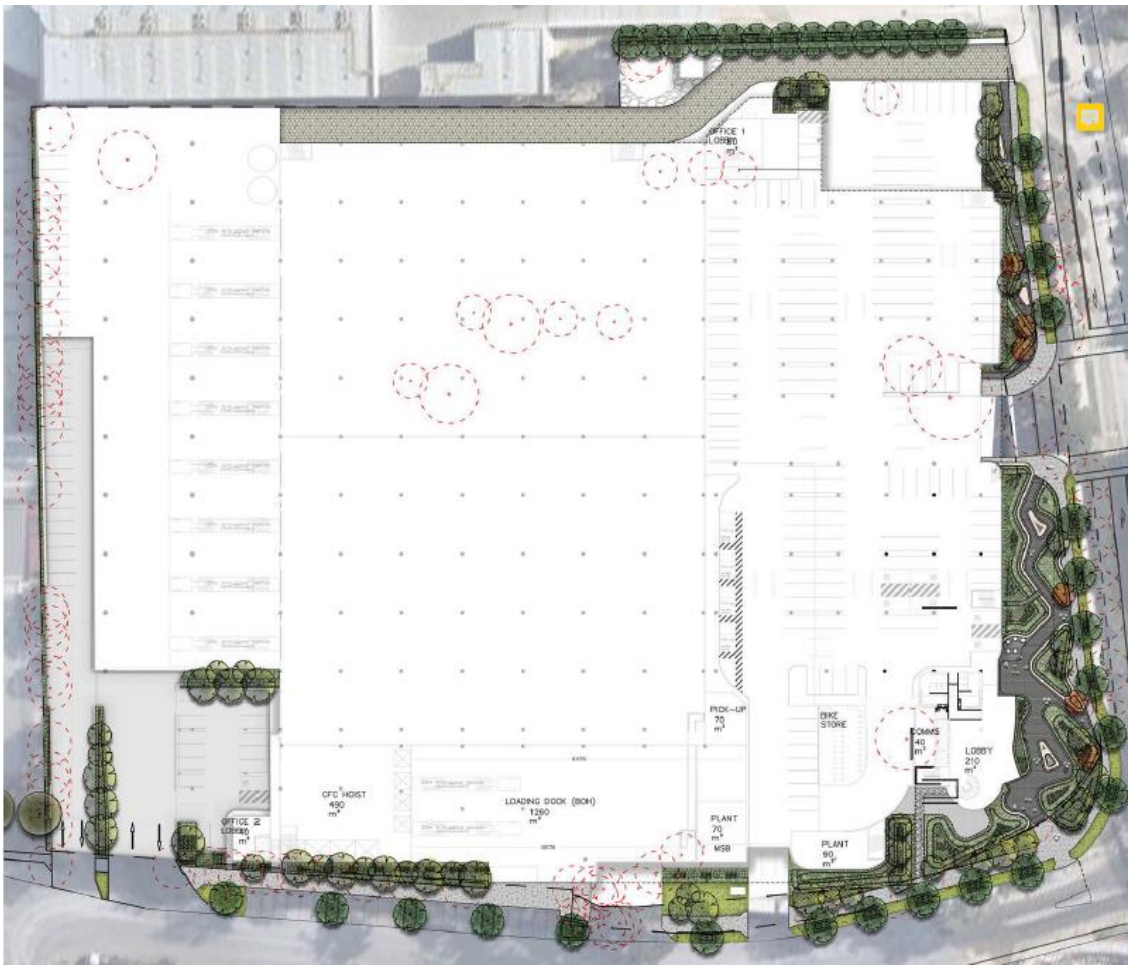
A passive, outdoor courtyard space is also proposed in the north-east corner of the Site. This space is intended to provide a 'break-out' space for employees of the Site and create a buffer to Edinburgh Road. This area will comprise the following elements:

- Feature brick paving;
- Brick planter walls;
- Tensile wire or mesh on car park wall to soften the built form;
- Shade tolerant plants to be incorporated into the meandering paths; and,
- Integration of timber to provide seating.

A landscaped roof terrace is also proposed atop of the office building as well as integrated landscaped balconies on level 3, 4 and 5. The roof terrace has been located to maximise views towards the Sydney CBD and will accommodate space for a BBQ and outdoor seating for use by staff. Various shrubs are proposed along the perimeter of the roof terrace to mitigate any prevailing winds and enhance the amenity of the space. The balconies on level 3, 4 and 5 will provide respite spaces for future employees and will have cascading and hardy plant species to help soften the built form and provide visual amenity to the various office spaces.

Overall, the proposed landscaping scheme has been designed to enhance the presentation of the Site when viewed from surrounding development and provide amenity for future works on the Site. The proposed landscaping will soften the bulk and scale of the built form enhance the presentation to Sydney Steel Road and Edinburgh Road and complement the existing streetscape character.

Figure 12 Landscape masterplan



Source: Site Image

4.5. OPERATION AND MANAGEMENT

4.5.1. Employment

The warehouse and CFC will employ a total of approximately 450 people, including online grocery shopping, courier pick-up and delivery services and general warehousing, with a maximum of approximately 200 employee's on-site at any time.

The office will employ a total of 210 people with a maximum of approximately 160 employee's on-site at any one time. Upon completion of the proposed development, it is estimated up to 660 full time equivalent jobs will be generated by the development. It is estimated that full time staff will comprise:

- Online grocery shopping;
- Courier pick-up and delivery services;
- Office;
- General warehousing.

It is estimated that a total of 361 direct construction jobs will also be created (refer to Social and Economic Report included at **Appendix K.**

4.5.2. Operating Hours

Consent is sought for 24-hours, seven days a week operation of the warehouse and distribution facility. This includes office, loading and unloading operations. Access, Parking and Transport

The following section discusses the access, parking and transport arrangements associated with the proposed development. The Traffic and Transport Impact Assessment attached at **Appendix H** provides further clarification on these matters.

4.5.3. Pedestrian Access

It is expected that the majority of staff commuting to the Site will either drive, cycle or walk. The development includes the provision of on-site car parking, bicycle parking, lockers and shower facilities.

Access to the office building will be via the ground floor lobby at the corner of Sydney Steel Road and Edinburgh Road. Stairs and lifts will provide access to the offices on the upper levels.

Access to the speculative warehouse and CFC will be via the ground floor lobby at the corner of Edinburgh Road and Sydney Steel Road. Access will also be available via the associated offices located off Sydney Steel Road and at the north-west corner of the Site.

4.5.4. Parking

Parking rates have been provided in accordance with the *Marrickville Development Control Plan 2011* (**MDCP 2011**) parking provisions. The breakdown of parking spaces provided are summarised below:

- Staff parking: 371 spaces
- Pick-up spaces: 4
- Van parking (CFC): 140

A hardstand parking area for staff is located within the front setback across two levels (ground level and level one). A hardstand parking area for delivery vehicles and vans is located at the rear of the Site, adjacent the warehouse and CFC, across three levels (ground level, level two and level four).

4.5.5. Bicycle Parking

The proposed development will provide 106 bicycle spaces for staff. Bike storage is located at the ground floor, accessible from the lobby. Showers and lockers will be provided on the upper levels of the office component. Access will be available via the ground floor lobby.

4.5.6. Vehicular Access and Loading

The former Masters DA approved on the Site (DA 2015/00168) granted consent for a fourth arm at the traffic signals at Edinburgh Road and Smidmore Street and signalised pedestrian crossings on all approaches. The proposal seeks to retain the access arrangements approved under DA 2015/00168.

A total of four access points are proposed from Sydney Steel Road and two access points from Edinburgh Road. These access points are discussed in detail below:

- The main access to the Site is proposed via a fourth signalised approach to the Edinburgh Road/Smidmore Street intersection. This will include provision for new right turn bays in both directions on Edinburgh Road, for turns into the Site and Smidmore Street.
- A second driveway on Edinburgh Road will also be provided at the western end of the Site for emergency access.
- Four driveways are also proposed from Sydney Steel Road, for service vehicles and as secondary access to the main car park.
  - Driveways will be provided from Sydney Steel Road to the CFC and loading dock (separate driveways for inbound goods and outbound delivery vans), plus a driveway for the separate warehouse space.
  - A secondary driveway will be provided to the main employee car park located towards the front of the Site.

Inbound deliveries to the CFC will be made by semi-trailers. Approximately 10 to 15 inbound deliveries are expected per day.

Outbound deliveries from the Site will be made by small rigid trucks, generally outside peak times. These vehicles will use a ramp to the upper level from Sydney Steel Road. Service vehicles will enter and exit the site in a forward direction.

4.5.7. Loading, Unloading and Servicing

The majority of parking for delivery vehicles will be provided in a two-level car park, connected by an internal ramp. Additional at-grade parking will be provided on the southern side of this warehouse.

Parking spaces will be provided with minimum dimensions of 5.4m long by 2.5m wide. Spaces with adjacent obstructions will be 0.3m wider to appropriately provide for doors to open. Disabled spaces will be 2.4m, wide, with a 2.4m wide adjacent area for wheelchairs. These dimensions are considered appropriate, being in accordance with AS 2890.1:2004.

4.6. SUSTAINABILITY INITIATIVES

A key objective of the proposal is to reduce its energy and water consumption through onsite strategies. The development will also include other measures to ensure a holistic sustainable strategy for the development, such as:

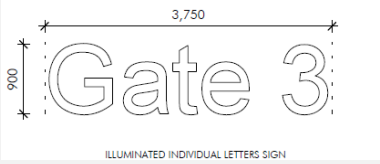
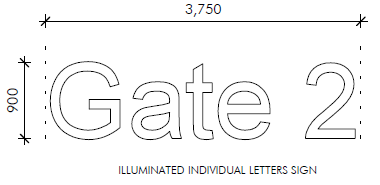
- Implement energy efficiency measures to reduce greenhouse gas emissions;
- Highly efficient water fittings and fixtures to maximise reductions in water consumption, and supplemented with rainwater harvesting;
- Procurement of materials that have low environmental impacts;
- Enhanced site ecology through high quality landscape design; and
- Design that mitigates or adapts to climate change impacts.

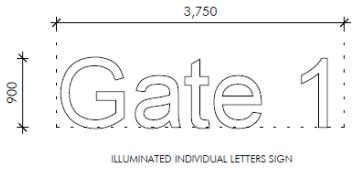
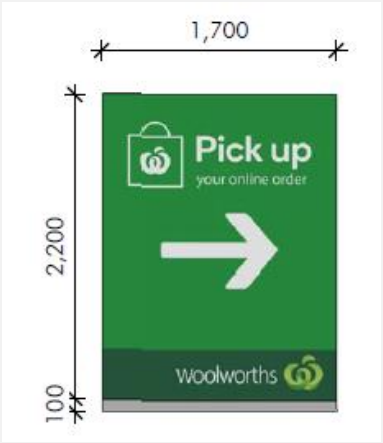
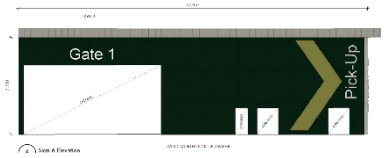
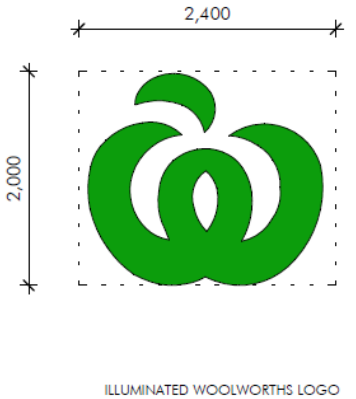
An Ecological Sustainable Development (**ESD**) Strategy has been prepared by WSP and is included **Appendix L**. This report provides further detail on how the overall planning and design of the building has incorporated ESD principles. The ESD Strategy provides an overview of measures and initiatives that are proposed for the building to deliver a high performing, highly sustainable development that meets policy compliance requirements. This is further discussed in Section 8.7.

4.7. SIGNAGE

This application seeks consent for the installation of 10 signs. Table 5 provides a summary of the sign type, content and dimensions.

Table 5 Proposed Signage

Sign Type	Sign Content	Dimensions	Example
Sign 01	Gate 3 *Illuminated letters*	3,750mm (W) x 900mm (H)	
Sign 02	Gate 2 *Illuminated letters*	3,750mm (W) x 900mm (H)	

Sign Type	Sign Content	Dimensions	Example
Sign 03	Return & earn *Illuminated letters*	7,300mm (W) x 900mm (H)	
Sign 04	Gate 1 *Illuminated letters*	3,750mm (W) x 900mm (H)	
Sign 05	Online pick up	1,700m (W) x 2,300 (H)	
Sign 06	Gate 1 / Pick-up	27,957mm (W) x 7,700 (H)	
Sign 07	Parking *Illuminated letters*	4,250mm (W) x 1,200 (H)	
Sign 08	Woolworths Logo *Illuminated*	2,400mm (W) x 2,000 (H)	
Sign 09	Woolworths	14,000 (W) x 2,000 (H)	

Sign Type	Sign Content	Dimensions	Example
Sign 10	Woolworths.com.au	21,500 (W) x 2,000 (H)	

4.8. WASTE MANAGEMENT

The storage, management and disposal of waste generated by the operation and construction of the proposed development have been appropriately considered in the Waste Management Plan prepared by Land & Groundwater Consulting at **Appendix M.** The primary waste streams expected to be generated by the ongoing operation of the total development are summarised below.

The primary waste streams expected to be generated by the ongoing operation of the total development are summarised below.

Table 6 Estimated weekly operational waste

Type of Waste	Reuse	Recycling	Disposal	Method of on-site reuse, contractor and recycling outlet and /or waste depot to be used
Other waste – specify (eg. paints, PVC tubing)	0	0	<1m³ (GSW)	Waste Management Centre
Packaging (used pallets, pallet wrap)	0	<2m³	0	Recycling Outlet
Containers (cans, plastic, glass)	0	<1m³	0	Recycling Outlet
Paper/cardboard	0	<2m³	0	Recycling Outlet
Total	0	<5m³	<1m³	

Waste storage locations will be provided within the loading docks area at the eastern and southern sides of the Warehouse where the recycling bins, garbage skips, plastic and cardboard compactors will be stored prior to collection.

Sufficient space will be provided for the segregation and storage of varying waste types including provision for the collection of fluorescent tubes, smoke detectors, e-waste and other recyclable resources. Sufficient space will also be provided for reuse items such as crates and pallets for occupational safety purposes.

4.9. SERVICES AND UTILITIES

Shelmerdines Consulting Engineers have carried out a maximum demand assessment of the proposed warehouse facility for Woolworths Group to be located in Marrickville (**Appendix JJ).** The building will incorporate automations systems and refrigeration systems, of which the maximum demand calculation includes. The maximum demand has been calculated as 6,000kVA or 8,500Amps.

A Preliminary Enquiry was submitted to Ausgrid on the 6th August 2020. A formal response is yet to be received, however a verbal response from Ausgrid has been received. Ausgrid have advised that the Site will need to have all existing transformers and high voltage infrastructure decommissioned and removed from

the Site prior to commencement of construction. New chamber type substations will be required to be established on the Site. The chambers shall contain four (4) off 1,500kVA transformers to support the 6,000kVA load.

Additionally, there is existing capacity in the nearby 11kV high voltage network to support the proposed load. The connection point of the 11kV high voltage would be to the north of the site in Edinburgh Road as per the diagram below. Therefore new dedicated high voltage feeders are not required to be installed to the Marrickville Zone Substation.

A Sydney Water Asset Review Report has also been prepared by MGP and included at **Appendix S.**

4.10. CONSTRUCTION STRATEGY

A Draft Construction Management Plan (**CMP**) has been prepared by Root Partnerships and is provided at **Appendix N.** It is intended that a further detailed Construction Management Plan and works plans for each phase of the project will be prepared and relevant approvals secured prior to construction commencement.

Notwithstanding, Root Partnerships outlined how traffic management and work hours can be managed across the proposed demolition and construction works. The development is expected to be constructed as follows:

- Early Works including:
  - Dilapidation Survey
  - Geotechnical Survey and Report
  - Services identification, connections and disconnection
- Demolition Works
- Piling and Footing Construction
- Structure – Warehouse and Office
- Façade
- Specialised Equipment / Integrated Automation Fit

Construction work will be undertaken in accordance with the hours specified in the relevant consent conditions, which are proposed to be:

- Monday to Friday – 7am to 6pm
- Saturday – 7am to 4pm
- Sunday/public holidays – no work.

5. STRATEGIC PLANNING CONTEXT

A range of strategic planning policies are identified in the SEARs that are required to be addressed. These include, but not limited to:

- *Greater Sydney Region Plan: A Metropolis of Three Cities;*
- *Our Greater Sydney 2056: Eastern City District Plan;*
- *Future Transport Strategy 2056 Strategy;*
- *Towards our Greater Sydney.*

As per the government agency submissions to SSD 10468, consideration has also been given to the following planning policies:

- *Future Transport – Greater Sydney Services and Infrastructure Plan;*
- *NSW Freight and Ports Plan 2018-2023;*
- *Inner West Local Strategic Planning Statement;*
- *Draft Inner West Employment and Retail Lands Strategy;* and,
- *Integrated Transport Strategy.*

5.1. GREATER SYDNEY REGION PLAN: A METROPOLIS OF THREE CITIES

The *Greater Sydney Region Plan: A Metropolis of Three Cities;* ('the Region Plan') is the NSW Government's overarching strategic plan for growth and change in Sydney. The Region Plan is a 20-year plan with a 40-year vision that seeks to transform Greater Sydney into a metropolis of three cities being the Western Parkland City, the Central River City and the Eastern Harbour City.

The Plan informs district and local plans, assists infrastructure agencies to align infrastructure delivery and informs the private sector and wider community of the growth management and infrastructure investment intentions moving into the future.

The vision of the plan is built on three 30-minute cities within Greater Sydney with the intent of improving access to jobs, services, entertainment and cultural facilities through different modes of transport.

The Eastern Harbour City is well-established, well-serviced and highly accessibly by its radial rail network, with half a million jobs and the largest office market in the region. The proposed development is consistent with the Region Plan, in particular the following objectives:

- ***Objective 3: Infrastructure adapts to meet future needs***
  - In response to technological changes, the proposed warehouse and CFC will utilise innovative technologies to increase efficiencies in the transportation of goods. The CFC will be highly automated to deliver faster and more reliable delivery services.
  - Woolworths is experiencing a significant increase in the growth of online shopping. The proposed development responds to this growing trend by providing a warehouse and distribution facility that utilises innovative technology to enhance online capacity.
- ***Objective 4: Infrastructure use is optimised***
  - The development is located on a site supported by transport infrastructure including a highly connected road network, public transport, and active transport links. The proposal seeks to capitalise on the existing and future transport infrastructure by siting the development in a location closer to online customers that is easily accessible to Sydney's north, south, east and west. This will enable faster delivery services to online shoppers and supermarkets.
- **Objective 14: A Metropolis of Three Cities – integrated land use and transport creates walkable and 30-minute cities**

- The proposal seeks to deliver more efficient supply chains, reduce business costs, increase access to markets and enhance access to a greater number of skilled workers by locating the warehouse and distribution centre in an accessible location close to public transport and residential dwellings.
- The development integrates industrial and ancillary office land uses within close proximity to public transport to facilitate 30-minute cities.

- **Objective 16. Freight and logistics network is competitive and efficient**
  - The proposal responds to the increasing importance placed on 24/7 supply chain operations to maintain Greater Sydney's global competitiveness.
  - As outlined in the Region Plan, the forecast increase in online deliveries and the movement of goods will require a freight network that can support safe, efficient and reliable journeys between the site, online customers and supermarkets across Sydney.
  - The Site is located in a highly accessible location, mid-way between Sydney Airport and Western Sydney, and will operate 24/7.
- ***Objective 23. Industrial and urban services land is planned, retained and managed***
  - The development will provide warehouse and distribution facilities and jobs close to where people live which is considered critical to Greater Sydney's productivity.
  - The proposal protects existing industrial land by retaining the existing land zoning and proposing a predominantly industrial development. The ancillary office space is directly associated with the warehouse operations and therefore will not detract from the underlying objective of the land use zone which is to provide a range of industrial, warehouse and related land uses.
  - As per the Region Plan, a review of industrial land adjacent to train stations, which would normally be considered a preferred location for conversion to residential development, reveals there are only a few sites remaining across Greater Sydney. The Site is located within 800m of Sydenham Station and is part of a largely intact industrial precinct making it suitable for the proposed development.
- ***Objective 32. The Green Grid links parks, open spaces, bushland and walking and cycling paths***
  - The proposal prioritises opportunities for people to walk, cycle and use public transport by co-locating industrial and office land uses in proximity to Sydenham Station and bike links.
  - The proposal will also deliver a share path along Sydney Steel Road to improve pedestrian and cycle access from the Site to Sydenham Station and surrounding cycle and pedestrian networks.

5.2. OUR GREATER SYDNEY 2056: EASTERN CITY DISTRICT PLAN

Our *Greater Sydney 2056: Eastern District Plan* ('the 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 plan and guide the planning and support for growth and change across the district.

The District Plan contains planning priorities relating to infrastructure provision, establishing land use and transport structure, environmental protection and growing investment, business opportunities and jobs in strategic centres. It recognises the importance of industrial land supply within the Eastern City District. The proposed development will assist in meeting Planning Priority E12 which seeks to retain and manage existing industrial land.

As outlined in the District Plan, Greater Sydney's existing industrial, manufacturing, warehousing and distribution industries contribute to its role as Australia's manufacturing capital. Marrickville is identified as one of the largest industrial and urban services precinct with 66 hectares of developed land. As per the District Plan, all existing industrial and urban services land should be safeguarded from competing pressures, especially residential and mixed-use zones. The proposed development directly achieves this objective by retaining the existing land for industrial activities, required for economic and employment purposes.

The Site is well located for the proposed warehouse and distribution facility, situated close to two existing international trade gateways being Port Botany and Sydney Airport. As outlined in the District Plan, demand

for this land will increase as Sydney's population grows. Locating the proposed development on the Site will reduce travel time when distributing goods and minimise congestion on the transport system.

5.3. FUTURE TRANSPORT STRATEGY 2056

The NSW Government's *Future Transport Strategy 2056* sets the 40-year vision, directions and outcomes framework for the transport system and customer mobility in NSW, which are outlined for Regional NSW and Greater Sydney. It will guide transport investment over the longer term delivered through a series of services and infrastructure plans and other supporting plans.

The Strategy acknowledges the importance of transport in supporting a productive economy, liveable communities and more sustainable transport solutions. The Strategy identifies the transport projects that will directly impact the Site. These include:

- **Public Transport Infrastructure (0 – 10 years):**
  - Sydney Metro City and Southwest
  - Sydney Metro West
  - Eastern suburbs to Inner West Rapid Bus Links
- **Active Transport (0 – 10 years):**
  - Council partnership program to improve local walking and cycling links and inner Sydney priority cycleway links
- **Road Infrastructure (0 – 10 years):**
  - WestConnex including the M4 extension, M5 duplication, M4-M5 Link, Rozelle interchange and St Peters Interchange;
- **Other Major Infrastructure Upgrades (0 – 10 years):**
  - Sydney Airport road upgrades; and
  - Duplication of Port Botany Freight Line.

The Site benefits from close proximity to both Marrickville and Sydenham Station, both of which are currently being upgraded to allow for the introduction of the Sydney Metro system.

The strategic location of a warehouse and distribution facility with associated offices close to Sydenham and Marrickville Station delivers economic benefits for Sydney by enhancing connectivity between goods, jobs, services and people.

The Site benefits from excellent access to the Sydney freight network including the M1, Princes Highway, Canterbury Road and Parramatta Road which provides an opportunity to boost the city's productivity by allowing goods to be transported faster and more reliably.

5.4. FUTURE TRANSPORT - GREATER SYDNEY SERVICES AND INFRASTRUCTURE PLAN

The *Greater Sydney Services and Infrastructure Plans* establishes the customer outcomes for Greater Sydney and regional NSW for the movement of people and freight to meet customer needs and deliver responsive and innovative services.

The Future Transport Strategy establishes six state-wide transport outcomes for New South Wales which will guide future policy change and provide a framework to establish a modern and innovative transport system that serves the community and economy.

The following outcomes have been specifically identified:

- Customer focused;
- Successful places;

- A strong economy;
- Safety and performance;
- Accessible services; and
- Sustainability.

The proposed development achieves the above outcomes by:

- Promoting walking and cycling as a convenient transport option for future employees by providing on-site bicycle parking and end of trip facilities;
- Locating the development in an inner city location within 30 minutes of other strategic and metropolitan centres;
- Locating the development on a Site well serviced by existing and future public transport including Marrickville Station and Sydenham Station and the future metro stations.

5.5. NSW FREIGHT AND PORTS PLAN 2018-2023

The *NSW Freight and Ports Plan 2018-2023* seeks to identify clear initiatives and targets to make the New South Wales freight task more efficient and safer. The Plan contains the following key objectives:

- Increase economic growth – by providing confidence and certainty that encourages continued investment in the freight industry;
- Increase efficiency, connectivity and access – by improving the efficiency of existing infrastructure and ensuring greater connectivity and access along key freight routes;
- Provide greater freight capacity – by maximising infrastructure investment and increasing land use capacity to accommodate growth;
- Improve safety – by creating a safer freight supply chain involving safe networks, safe transport, safe speeds and safe people;
- Enhance sustainability – by developing a sustainable supply chain that delivers benefits to our environment and continued operations into the future.

The Site has been chosen for the development based on public transport accessibility, including bus routes and connections to existing and future upgraded railway connections and proximity to key road networks.

The Site is strategically located to play a key role in making Woolworths deliveries faster, safer and more efficient. Delivery vans will typically make 15-20 deliveries and are routed to ensure efficiency and minimise vehicle kilometres travelled. In this way, online order fulfilment and delivery significantly reduces the number of vehicle kilometres travelled, compared to individual shoppers visiting a supermarket and will increase efficiencies, safety and sustainability of the supply chain.

5.6. INNER WEST LOCAL STRATEGIC PLANNING STATEMENT

The *Inner West Local Strategic Planning Statement* is the draft Local Strategic Planning Statement (**LSPS**) for the Inner West local government area and links the state and local strategic plans with the planning controls to guide future development over the next 20 years and inform the Local Environmental Plan review.

Council's LSPS was finalised on 31 March 2020. The vision is underpinned by key directions including 'productivity' as it relates to the efficient use of resources and delivery of goods and services. A key objective of the LSPS is to ensure productivity continues to grow by retaining its industrial lands, by protecting employment lands and target industries from incompatible uses and improving connectivity to employment and within supply chains.

The proposal achieves the objectives of the LSPS by retaining the existing industrial use, protecting employment generated land from incompatible land uses and improving connections between people and employment due to the Site's proximity to active and public transport links including Sydenham Station and the pedestrian link south of Sydney Steel Road.

The proposed development is consistent with the LSPS, including the following priorities:

- **Planning Priority 9**

Planning Priority 9 seeks to create a thriving economy and is underpinned by the following objectives:

  – *The local economy is diverse, strong and resilient;*

  – *Retain, protect and increase industrial lands;*

  – *Zoning and planning provisions accommodate affordable entry points for a range of industries;*

  – *Inner West continues to grow as a leading creative and cultural hub;*

  – *Main streets and centres are designed to be unique, lively, safe and accessible*.

The focus of land use zones relating to productivity actions in IN1 General Industrial zones are industrial and warehouse uses. The proposal will provide a warehouse and distribution facility with associated offices and therefore directly responds to this planning priority.

- **Planning Priority 12**

Planning Priority 12 seeks to deliver equitable community participation in planning matters and is underpinned by the following relevant objectives:

  – *Maintain, support and establish proactive partnerships and engagement with government, agencies, the community and business;*

  – *The planning outcomes for the identified growth and collaboration areas are underpinned by cross-stakeholder collaboration processes to address complex issues.*

As part of the planning process, consultation has occurred with a range of stakeholders including Council, government agencies and the community. The Applicant is committed to continuing to work with these stakeholders to facilitate coordinated planning to deliver positive planning outcomes for the Site and broader LGA.

5.7. DRAFT INNER WEST EMPLOYMENT AND RETAIL LANDS STRATEGY

The *Draft Inner West Employment and Retail Land Strategy* responds to the planning priorities outlined in the Eastern City District Plan and Council's *Community Strategic Plan Our Inner West 2036*. It considers the changing economic and policy environment at a local, district and state-wide level and identifies specific locations and industries which are considered important to the delivery of current and future employment opportunities.

It identifies the importance of industrial lands and recommends changes to planning controls to support the desired role of employment lands. The following Principles are of relevance to the subject development.

- **Principle 3**

Principle 3 seeks to retain a diversity of industrial land, urban services land and employment generating uses. This principle is supported by the following recommendations:

  – *No rezoning of industrial land;*

  – *Prohibit residential development in B5 Business Development, B6 Enterprise Corridor, IN1General Industrial and IN2 Light Industrial zones;*

  – *Establish a minimum subdivision lot size (including restricting strata subdivision) of 10,000 sqm in IN1 zone to minimise property fragmentation;*

  – *Implement minimum non-residential FSR provisions in Ashfield, Balmain, Leichhardt, Marrickville and Newtown.*

The proposal directly responds to Principle 3 by retaining the existing industrial land use on the Site. Whilst a small component of the Site is intended to be used for the purposes of ancillary office space, the primary land use is for a warehouse and distribution facility which will provide valuable employment generating uses whilst preserving the industrial nature of the site and surrounds. In addition, the office component of the

development will support job growth on the Site, and contributes to the viability of the new warehouse and distribution facility in this location.

- **Principle 4**

- Principle 4 seeks to capitalise on infrastructure investment and is supported by the following objective:

  – *Active transport connections from train stations to surrounding employment precinct*

The proposal capitalises on infrastructure investment by locating an employment generating land use in close proximity to Sydenham Station and Marrickville Station, both of which are currently being upgraded to provide fast and reliable services to Central, Barangaroo, Pitt Street (CBD), Victoria Cross (North Sydney), Chatswood and Macquarie University.

5.8. INTEGRATED TRANSPORT STRATEGY

Inner West Council's *Integrated Transport Strategy* was adopted on 3 March 2020. The Strategy aims to address existing transport challenges such as congestion, crowding and infrequent public transport services by providing strategies and actions that focus on active and sustainable modes of transport, and land-use planning approaches to support these modes of transport.

The Vision of the Strategy is to:

- Grow the numbers of Inner West residents, workers and visitors who prefer to walk, cycle and use public transport because it is safe, convenient, enjoyable and healthy.
- Connect everyone to the community and local services with access to educational, retail, cultural and recreational districts, as well as jobs and services across local and regional areas.
- Enhance local economic vitality, with freight and goods movements separated from people by space and/ or time.

The proposal achieves the objectives of the Strategy by providing on-site bicycle parking and end-of-trip facilities to promote the use of active modes of transport, increasing employment on the Site by redeveloping the existing Site for the purposes of a warehouse and distribution facility, anticipated to accommodate 660 jobs and enhancing local economic vitality and amenity by retaining the existing industrial use and separating the movement of freight and goods from nearby residential areas.

6. STATUTORY PLANNING CONTEXT

As outlined in the SEARs, the statutory provisions contained in the planning instruments listed below have been addressed:

- *Environmental Planning and Assessment Act 1979;*
- *Biodiversity Conservation Act 2016;*
- *State Environmental Planning Policy (State and Regional Development) 2011;*
- *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development;*
- *State Environmental Planning Policy (Infrastructure) 2007;*
- *State Environmental Planning Policy No. 55 – Remediation of Land;*
- *State Environmental Planning Policy No. 64 – Advertising and Signage;*
- *State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017;*
- *Draft State Environmental Planning Policy (Environment);*
- *Marrickville Local Environmental Plan 2011 (MLEP 2011);* and,
- *Marrickville Development Control Plan 2011 (MDCP 2011).*

6.1. ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979

Pursuant to Section 4.36(2) of the *Environmental Planning and Assessment Act 1979* (**EP&A Act**):

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

The proposal is classified as SSD as detailed in Section 7.3 below. In accordance with Section 4.5 of the EP&A Act, the Independent Planning Commission is designated as the consent authority if there is a Council objection to the DA or there are more than 25 submissions, unless otherwise declared by the Minister as a State Significant Infrastructure related development.

Unless otherwise declared, the Minister will be the consent authority for the detailed SSDA (refer Clause 8A of the SRD SEPP and Instrument of Delegation dated 11 October 2018).

Table 7 below provides an assessment of the proposal against the objectives contained within Section 1.3 of the EP&A Act.

Table 7 Objectives of the EP&A Act

Objectives	**Comment / Response**
To promote the social and economic welfare of the community and a better environment by the proper management, development, and conservation of the State's natural and other resources.	The development will contribute towards the social and economic welfare of the community by generating 361 direct construction jobs and 660 ongoing operational jobs in the area. The proposal also responds to current social and economic circumstances by facilitating faster and more reliable online delivery services. This is increasingly important given the COVID 19 pandemic which has resulted in online grocery sales increasing from 32.3% to 56% in 2019-2020 (IBIS World).
To facilitate ecologically sustainable development by integrating relevant economic, environmental,	The proposal includes measures to deliver ecologically sustainable development including a

Objectives	Comment / Response
and social considerations in decision-making about the environmental planning and assessment.	comprehensive landscaping scheme and water sensitive urban design measures. Detailed ESD commitments are discussed in the ESD Strategy included at **Appendix L.** The development will also provide 660 operational jobs and promote the use of active and public transport by providing on-site bicycle storage and end-of-trip facilities.
To promote the orderly and economic use and development of land.	The proposal promotes the orderly and economic development of the land approved for industrial uses and is expected to generate up to 361 direct construction jobs and 660 operational jobs.
To promote the delivery and maintenance of affordable housing.	N/A.
To protect the environment, including the conservation of threatened and other species of native animals and plants, ecologically communities and their habitats.	The development is located within an established urban environment. A BDAR waiver has been issued from the DPIE which determined the proposal will have no impact on threatened species or their habitats (**Appendix O).** The development proposes the removal of trees in addition to those approved as part of DA 2015/00168. Notwithstanding this, a comprehensive landscaping scheme has been prepared by Site Image to compensate for the loss of trees and retain the existing landscaped character of the Site (refer to **Appendix J**).
To promote sustainable management of built and cultural heritage (including Aboriginal cultural heritage).	The Site is not a heritage item or located in a heritage conservation area. A Heritage Impact Statement has been prepared by Urbis and included at **Appendix G**. The assessment concludes the proposed development is considered to have no adverse heritage impacts on the character of the area or on any of the vicinity heritage items. An Aboriginal Objects Due Diligence Assessment (**ADD**) has also been prepared by Urbis. The ADD concluded there are no Aboriginal sites/objects/places registered within the subject area and the Site has been the subject of moderate to high ground disturbance by historical land use. Notwithstanding this, due to the depth of the soil landscape and proximity to water, it is considered that the subject area has moderate to high

Objectives	Comment / Response
	archaeological potential. Urbis is currently undertaking an Aboriginal Cultural Heritage Assessment (**ACHA**) in accordance with the recommendations of the ADD. The ACHA will be completed in December 2020, prior to the determination of this SSDA (see **Appendix P**). A copy of the draft ACHA has been provided at Appendix P.
To promote good design and amenity of the built environment.	The proposed bulk and scale of the development is consistent with what would be expected of a large warehouse and distribution facility on a site zoned industrial. The visual impacts of the warehouse are considered acceptable given the Site's location in an IN1 General Industrial Zone and proposed tree planting within the Site and along the Site's perimeter.
To promote proper construction and maintenance of buildings, including the protection of the health and safety of their occupants.	A Draft Construction Management Plan is attached at **Appendix N.** A number of strategies will be put in place to manage construction impacts.
To promote the sharing of responsibility for environmental planning and assessment between different levels of government in the State.	Relevant Government agencies have been consulted throughout the concept and detailed design processes. It is noted that the Minister for Planning is the consent authority for SSDAs.
To provide increased opportunity for community participation in environmental planning and assessment.	An inclusive public consultation strategy has been implemented throughout the project design process (refer to Section 7 of the EIS and **Appendix E**).

Section 4.38(3) of the EP&A Act permits development consent to be granted despite the development being partly prohibited by an environmental planning instrument:

> *(3) Development consent may be granted despite the development being partly prohibited by an environmental planning instrument.*

The office component of the development is prohibited under the MLEP 2013, and therefore consent for the office component of the proposal is sought in accordance with Section 4.38(3) of the EP&A Act.

The office component is sufficiently and inextricably connected with the 'warehouse and distribution' use on the site, providing office space for tenants of the warehouse component of the development. The Level 2 warehouse is a purpose-built CFC facility for Woolworths and the warehouse space will be used by WooliesX which undertakes the product ordering, and manages customer orders, fulfillment and dispatch. The co-location of these two activities strengthens the functional efficiency of the CFC facility and delivers operational synergies which are not otherwise achieved where the office operations are separately located to the warehouse functions.

Accordingly, the warehouse and office functions are corelated and form a single operational development for the Site and can be granted consent by operation of Section 4.38(3) of the EP&A Act.

6.2. BIODIVERSITY CONSERVATION ACT 2016

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

In accordance with Clause 7.9 of the BC Act*,* any State Significant Development Application is to be accompanied by a Biodiversity Development Assessment Report (**BDAR**) unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity value.

An assessment was undertaken against the criteria to assess biodiversity under the *Biodiversity Conservation Act* and *Biodiversity Conservation Regulation 2017.* The assessment found:

- No threatened ecological communities, flora or fauna species have been previously mapped in the Site nor were any observed within the site during the field survey.
- The removal of the 0.27 ha of vegetation present within the Site will not trigger the BOS threshold for a lot (0.5 ha or more).
- Due to the limited amount of planted native vegetation present, the Site does not contain sufficient foraging resources to sustain any threatened fauna species. At best, native and exotic plantings have the potential to provide marginal seasonal foraging habitat for the highly mobile species *Pteropus poliocephalus* (Grey-headed Flying-fox). The proposed development will not result in a significant impact to this threatened species. Suitable roosting habitat for threatened fauna species was not identified within the Site.
- Native vegetation within the Site was of low abundance and part of a highly fragmented urbanised landscape.
- Movement for less mobile threatened fauna, such as mammals (not including bats), across the Site is highly unlikely due to fencing, buildings, cleared open areas and a lack connective vegetation.
- Given the limited vegetation within the Site, and the absence of connectivity in the canopy, it is unlikely that the Site would be a significantly important flight path for protected animals.
- No natural water courses are present within the Site.
- Suitable habitat for threatened species is highly limited within the Site. Soils within the Site have been highly modified and provide no habitat for any threatened flora species.

A request seeking a waiver for the requirement for a BDAR was submitted to the NSW DPIE on 29th August 2020. The NSW DPIE granted a waiver on 9th September 2020 (see **Appendix O**) under Clause 7.9 (2) of the BC Act, concluding that:

> *"The proposed development as described above is not likely to have any significant impact on biodiversity values and that a BDAR is therefore not required to accompany any application for development consent or infrastructure approval for the proposed development."*

Overall, the proposal will not have any likely impact on the surrounding natural environment and abundance of species, habitat connectivity, threatened species movement and flight paths of protected animals, nor will it impact upon water quality surrounding the site (sustainability).

6.3. STATE ENVIRONMENTAL PLANNING POLICY (STATE AND REGIONAL DEVELOPMENT) 2011

The *State Environmental Planning Policy (State and Regional Development) 2011* (**SRD SEPP**) has the purpose of identifying development that is SSD, State Significant Infrastructure (**SSI**) (including critical) and regionally significant development.

The proposal is State Significant Development under Section 4.36 of the EP&A Act as the development has a capital investment value (CIV) over $50 million and is for the purpose of a warehouse under clause (12) of SRD SEPP.

In accordance with Schedule 1 of the SRD SEPP, development that has a capital investment value of more than $50 million for the purpose of warehouses or distribution centres (including container storage facilities) at one location and related to the same operation are classified as SSD.

> **12 Warehouses or distribution centres**
>
> *(1) Development that has a capital investment value of more than $50 million for the purpose of warehouses 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 19 applies.*

The proposed works have a CIV exceeding $50 million, of which the warehouse and distribution facility component of the development has a CIV of $45,053,273 (refer to the attached Quantity Surveyor statement at **Appendix F**). Accordingly, the proposal is SSD for the purposes of the SRD SEPP.

6.4. STATE ENVIRONMENTAL PLANNING POLICY NO. 33 – HAZARDOUS AND OFFENSIVE DEVELOPMENT

State Environmental Planning Policy No. 33 – Hazardous and Offensive Developments (**SEPP 33**) has been developed to control potentially hazardous and offensive developments and to ensure appropriate safety features are installed at a facility to ensure the risks to surrounding land uses is minimised. The policy includes a guideline that assists government and industry alike in determining whether SEPP 33 applies to a specific development.

The guideline, "Applying SEPP 33 - Hazardous and Offensive Developments" (**Applying SEPP 33**) provides a list of threshold levels, for the storage of dangerous goods, above which the regulator considers the dangerous goods storage to be potentially hazardous. In the event the threshold levels are exceeded, SEPP 33 applies and a Preliminary Hazard Analysis (**PHA**) is required, followed by a series of hazard analysis studies.

To ensure the merits of the proposal are properly assessed in regard to off-site risk and offence, a SEPP 33 Assessment has been prepared by Riskcon (see **Appendix Q**) to determine whether the facility is potentially hazardous and whether an additional risk assessment is required.

Riskcon have implemented the following methodology:

- Reviewed the types and proposed quantities of dangerous goods to be stored at the site;
- Compared the quantities of dangerous goods against the threshold quantities listed in Applying SEPP 33 to identify whether the storage location or quantity triggers SEPP 33; and,
- Reviewed the likely vehicular movements involving dangerous goods and compared against the applicable thresholds detailed in Applying SEPP 33.

An initial review of the site operations indicated minimal quantities of dangerous goods would be stored at the Site. However, to ensure any changes to future operations which may include additional dangerous goods being stored are fully captured, quantities have been specified in excess of what is currently being stored. The following table identifies the type of dangerous goods to be stored and whether the Class is subject to SEPP 33.

Table 8 DG Classes or Materials Stored and Maximum Quantities

Class	Description	PG	Quantity (kg)	Class subject to SEPP 33 (Y/N)
3	Flammable Liquids	III	45,000	Y

Storage of Dangerous Goods

The only Class assessable is Class 3 which is based upon distance from the storage to the site boundary. The distance required from the storage to the site boundary is 8m. The closest boundary to the warehouse is 6m on the north-western side of the building. This area of the building is dedicated to chilled and frozen products which extends 19m from the wall. Therefore, the closest area the dangerous goods could be stored is 25m from the site boundary and would subsequently not exceed the SEPP 33 threshold. No further assessment is required.

Transport of Dangerous Goods

The flammable liquids stored are in packages and are PG III which indicates there is no limit on the number of deliveries which can occur. Therefore, the site would not exceed the SEPP 33 transport limits.

The results of the SEPP 33 assessment indicate the threshold quantities for the dangerous goods to be stored and transported are not exceeded and therefore SEPP 33 does not apply to the proposed development. As the facility is not classified as potentially hazardous, it is not necessary to prepare a Preliminary Hazard Analysis for the facility as SEPP 33 does not apply.

6.5. STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE) 2007

The aim of *State Environmental Planning Policy (Infrastructure) 2007 (***Infrastructure SEPP***)* is to facilitate the effective delivery of infrastructure across NSW, by identifying matters to be considered in the assessment of development adjacent to particular types of infrastructure such a classified roads and prescribing consultation requirements for certain development.

Clause 104 of SEPP (Infrastructure) states that the following is classified as 'traffic generating activity':

- Commercial development over 10,000sqm with access to any road;
- Industrial development over 20,000sqm with access to any road.

The proposed warehouse has a GFA of 30,732sqm and the proposed office has a proposed GFA of 8,361sqm. Pursuant to clause 104 (Traffic Generating development) and schedule 3 of the ISEPP, the development is considered 'Traffic Generating Development' and therefore triggers consultation with the NSW Roads and Maritime Services (now a part of TfNSW).

Traffic impacts associated with the proposed development are discussed in detail within the Transport, Traffic and Parking Assessment prepared by Colston Budd Rogers & Kafes (**CBRK**) included at **Appendix H.**

6.6. STATE ENVIRONMENTAL PLANNING POLICY NO. 55 – REMEDIATION OF LAND

State Environmental Planning Policy No.55 – Remediation of Land (**SEPP 55**) provides a State-wide approach to the remediation of contaminated land, and primarily promotes the remediation of contaminated land for the purpose of reducing the risk of harm to human health.

A Detailed Stage 2 Site Investigation Report has been prepared by JK Environments and DLA Environmental and included at **Appendix R.** The report provides a detailed assessment of the extent and nature of any contamination of the soil, groundwater and soil vapour, potential risks to human health and the environmental receptors in the vicinity of the site and a description of any required mitigation and monitoring measures. The Detailed Site Assessment has been reviewed by a NSW EPA Accredited Site Auditor. A copy of the Site Audit Statement and Report has been included at **Appendix KK.**

The following potential contamination sources were identified at the Site:

- Fill material – The Site appears to have been historically filled to achieve the existing levels. The fill may have been imported from various sources and could be contaminated.
- Chemicals and Fuel storage – The Site has been used for various commercial purposes. Four USTs, an LPG and four hydrogen tanks were identified in the SafeWork. Records indicated that the USTs and ASTs were used to store diesel and petrol. The exact location of these tanks could not be determined.

- Use of pesticides – Pesticides may have been used beneath the buildings and/or around the Site.
- Hazardous Building Material – Hazardous building materials may be present as a result of former building and demolition activities. These materials may also be present in the existing buildings/ structures on Site.
- Off-site Area 1 – A dry cleaner is located up-gradient of the Site and is considered to be a potential off-site source of contamination.

The DSI did not identify widespread soil or groundwater contamination. Minor elevations of individual metals were detected in the soil and groundwater above the ecological Site Assessment Criteria (**SAC**). A detection of friable asbestos (**AF/FA**) was encountered in the fill in borehole BH117. The concentration of AF/FA was below the SAC.

The Site Audit Statement notes that whilst the results of the DLA and JKE investigations have not identified significant contamination of soil or groundwater at the site, based on the site history and the limitations associated with the sampling and analysis for asbestos in soils, there is the potential for asbestos impacted fill materials to be present at the site that will require remediation or management during the redevelopment. There is also the potential that unidentified sources of contamination may be encountered, such as underground tanks or subsurface structures. It is recommended that a RAP is prepared for further assessment and remediation during demolition and redevelopment of the site.

Specific mitigation measures are discussed in Section 8.15. Notwithstanding this, DLA and JKE are of the opinion the site can be made suitable for the proposed development.

6.7. DRAFT CONTAMINATED LAND PLANNING GUIDELINES

The *Draft Contaminated Land Planning Guidelines* (**Planning Guidelines**) have been prepared by the DPIE and Environment Protection Authority (**EPA**) to assist planning authorities address land contamination issues and assess development applications for remediation works. The Guidelines are primarily for planning authorities however have been considered as part of this assessment.

As discussed above, JKE are of the opinion that the Site is suitable for the proposed development subject to completing a Hazardous Building Materials Assessment (Hazmat) for the existing structures at the Site, preparing and implementing an Asbestos Management Plan for soil disturbance in the vicinity of BH117, preparing and implementing an Unexpected Finds Protocol for the development works; and preparing and implementing an ASS Management Plan for the proposed development.

6.8. STATE ENVIRONMENTAL PLANNING POLICY NO. 64 – ADVERTISING AND SIGNAGE

State Environmental Planning Policy No.64 – Signage (**SEPP 64**) sets out planning controls for advertising and signage in NSW. The SEPP requires signage to be compatible with the future character of an area, provide effective communication in suitable locations, and be of high-quality design and finish.

Clause 8 and clause 13 of SEPP 64 prevent development consent from being granted to signage unless the consent authority is satisfied that it is consistent with the objectives of SEPP 64 and has satisfied the assessment criteria specified in its Schedule 1.

This application seeks consent for the installation of ten signs including business identification and wayfinding signage. Clause 13 of SEPP 64 indicates that a consent authority must not grant consent to display signage unless it is consistent with the objectives of the policy and complies with the assessment criteria contained within Schedule 1 of SEPP 64. An assessment of the proposed signage included as part of the SSDA against the beforementioned provisions is provided below.

Table 9 SEPP 64 Compliance Table

Provision	Comment	Compliance
1 Character of the Area		

Provision	Comment	Compliance
Is the proposal compatible with the character of the area or locality in which it is proposed to be located?	The character of Sydney Steel Road and Edinburgh Road is a typical industrial and large format retail estate with Marrickville Metro Shopping Centre located directly to the north. The signs are typical of development in this context.	**YES**
Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?	No advertising is proposed.	**N/A**
2 Special Areas		
Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas?	The Site does not contain a heritage item, is not located in a heritage conservation area and is not located in an area considered environmentally sensitive. Most signage is proposed at ground level with the exception of the Woolworths building identification signage on Level 7 which is orientated to the south-east, away from the residential area to the north. On this basis, the proposal is considered acceptable and will not result in any adverse impacts on the surroundings.	**YES**
3 Views and vistas		
Does the proposal obscure or compromise important views?	The proposed signs will be affixed to the building façade. The proposed signage on Level 7 is located below the maximum height of the building and will not obscure or compromise important views.	**YES**
Does the proposal dominate the skyline and reduce the quality of vistas?	Most of the proposed signs are located at ground level and will be affixed to the façade of the building. There will be no impact on the skyline or reduce the quality of any vistas.	**YES**
Does the proposal respect the viewing rights of other advertisers?	The proposal will not impact on the viewing rights of any advertisers.	**YES**
4 Streetscape, setting or landscape		
Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?	The scale, proportion and form of the proposed signage is considered appropriate as, it is proportionate to the size of the warehouse and office building, integrates with the building façade and architecture, is typical for an industrial use and will identify the tenants and vehicular access entries and exits in an appropriate manner.	**YES**

Provision	Comment	Compliance
Does the proposal contribute to the visual interest of the streetscape, setting or landscape?	The proposed signs will improve the visual interest of the streetscape, by incorporating high quality signage that integrates with the architectural built form of the building at ground and Level 7.	**YES**
Does the proposal reduce clutter by rationalising and simplifying existing advertising?	The proposed signage will be installed on a new building. It does not seek to rationalise or simplify existing advertising.	**N/A**
Does the proposal screen unsightliness?	The proposed signage will be installed on a new architecturally designed warehouse and office building, designed by Nettleton Tribe Architects. There is no unsightliness to be screened.	**YES**
Does the proposal protrude above buildings, structures or tree canopies in the area or locality?	The proposed signage is contained wholly on the building façade and does not protrude above the maximum height of the office or warehouse.	**YES**
Does the proposal require ongoing vegetation management?	The proposal does not require any ongoing vegetation management.	**N/A**
5 Site and Building		
Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located?	The proposed signs have been designed to be compatible with the scale and proportions of the warehouse and office and is considered appropriate for the context of the site and future character of Marrickville.	**YES**
Does the proposal respect important features of the site or building, or both?	Most of the proposed signs are located at ground level and are respectful of the architectural built form of the warehouse and office. The signage on Level 7 of the office building respects the height of façade articulation and will not dominate the surrounding locality or detract from any of the important features of the building.	**YES**
Does the proposal show innovation and imagination in its relationship to the site or building, or both?	The proposed signage is typical for the types of uses proposed.	**YES**
6 Associated devices and logos with advertisements and advertising structures		
Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed?	The signage will integrated with the building façade and Level 7 rooftop.	**YES**
7 Illumination		

Provision	Comment	Compliance
Would illumination result in unacceptable glare?	It is proposed to illuminate the letters of the proposed signs. The proposed illumination will comply with Australian Standards and will not affect the safety for pedestrians, vehicles or aircraft. The proposed signage does not interface with any residential or accommodation uses.	**YES**
Would illumination affect safety for pedestrians, vehicles or aircraft?		
Would illumination detract from the amenity of any residence or other form of accommodation?		
Can the intensity of the illumination be adjusted, if necessary?	If necessary, the intensity of illumination could be adjusted.	**YES**
Is the illumination subject to a curfew?	If necessary, the intensity of illumination could be adjusted. However, a curfew is not proposed.	**YES**
8 Safety		
Would the proposal reduce the safety for any public road?	The proposal will not reduce the safety of any public road, pedestrians or cyclists. The proposed signage is affixed to the building façade and therefore will not obscure sightlines from public areas.	**YES**
Would the proposal reduce the safety for pedestrians or bicyclists?		
Would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas?		

6.9. STATE ENVIRONMENTAL PLANNING POLICY (VEGETATION IN NON-RURAL AREAS) 2017

The *State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017* (**Vegetation SEPP**) works together with the *Biodiversity Conservation Act 2016* and the *Local Land Services Amendment Act 2016* to create a framework for the regulation of clearing of native vegetation in NSW. The Vegetation SEPP applies to the Sydney metropolitan areas and land zoned for urban purposes.

This Policy does not affect the provisions of any other SEPP or any provisions of a local environmental plan. An Arborist Repot has been prepared and is included at **Appendix I.**

6.10. DRAFT STATE ENVIRONMENTAL PLANNING POLICY (ENVIRONMENT)

The Draft State Environmental Planning Policy (Environment) (**Draft Environment SEPP**) is the new SEPP seeking to consolidate, repeal and replace the following seven existing SEPPs:

- *State Environmental Planning Policy No. 19 – Bushland in Urban Areas*
- *State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011*
- *State Environmental Planning Policy No. 50 – Canal Estate Development*
- *Greater Metropolitan Regional Environmental Plan No. 2 – Georges River Catchment*
- *Sydney Regional Environmental Plan No. 20 – Hawkesbury-Nepean River (No.2-1997)*

- *Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005*
- *Willandra Lakes Regional Environmental Plan No. 1 – World Heritage Property.*

Public exhibition of the Draft Environment SEPP was completed in January 2018. The Draft Environment SEPP will deliver a policy instrument that contains a single set of planning provisions for catchments, waterways, bushland and protected areas. The Site is not subject to any of the changes proposed within the draft SEPPs, nor it is identified as being attributed to any catchments, waterways, bushland or protected areas.

6.11. ADDITIONAL POLICIES AND GUIDELINES

As per TfNSW request in their submission during the SEARs notification period, the following policies and guidelines have been addressed:

- *Guide to Traffic Generating Development (Roads and Maritime Services)*
- *Road Design Guide (Roads and Maritime Services)*
- *Austroads Guide to Traffic Management – Part 12: Traffic Impacts of Development*
- *Austroads Guidelines for Planning and Assessment of Road Freight Access in Industrial Areas*
- *Cycling Aspects of Austroads Guides*
- *Australia Standards AS2890.3 (Bicycle Parking Facilities)*
- *Integrated Public Transport Service Planning Guidelines: Sydney Metropolitan Area 2013 (TfNSW)*

A Transport, Traffic and Parking Assessment has been prepared by Colston Budd Rogers & Kafes Pty Ltd (CBRK) and included at **Appendix H.**

6.12. MARRICKVILLE LOCAL ENVIRONMENTAL PLAN 2011

The Marrickville Local Environmental Plan 2011 (**MLEP 2011**) is the principal local planning instrument applying to the Site. The zoning, permissibility and key development standards are addressed below.

6.12.1. Zoning and Permissibility

The Site is zoned IN1 General Industrial with a small portion of SP2 Infrastructure (Stormwater Management Systems) as shown in Figure 13.

The proposed development is best defined in MLEP 2011 as:

- ***Warehouse or distribution centre***; and,
- ***Office premises*** (i.e. commercial premises).

'Warehouse or distribution centres' are permissible with consent in the IN1 Zone. *'Commercial premises'* is a prohibited land use on the Site. However, in accordance with Section 4.38 (3) of the EP&A Act, development consent may be granted despite the development being partly prohibited by an environmental planning instrument:

> *(3) Development consent may be granted despite the development being partly prohibited by an environmental planning instrument.*

Consent is sought for the proposed office component in accordance with Section 4.38 (3) of the EP&A Act. The warehouse and office will be occupied by 'WooliesX,' a business unit within Woolworths Group Limited. The office will comprise WooliesX staff, contractors, supplier representatives as well as the Customer Fulfillment Centre (CFC) Management and Operational Team Members, directly associated with the warehouse and CFC.

CFC Management and Operational Team Members include:

- Transport Operations;
- Warehouse Operations;

- Bakery Operations;
- Produce Operations;
- Deli, Dairy & 'Long Life' operations;
- Liquor & Secure Products;
- CFC Human Resources;
- CFC Training Facilities;
- Call Centre & Customer Relations Operations;
- Data and Information Technology Services;
- Business Operations Team.

The above business operations offer significant benefits to WooliesX being co-located with the warehouse and CFC. The office will not be used for any other purpose other than WooliesX. Woolworths currently operates a similar co-located office and warehouse operation at Mascot. As discussed previously in this report, the proposal seeks to relocate the Mascot warehouse and office and emulate the current operations at the Site.

As outlined in Section 6.1, the office component is sufficiently and inextricably connected with the '*warehouse and distribution'* use on the site. The co-location of the CFC warehouse and WooliesX operations strengthens the functional efficiency of the CFC facility and delivers operational synergies which are not otherwise achieved where the office operations are separately located to the warehouse functions.

Accordingly, the warehouse and office functions are co-related and form a single operational development for the Site and can be granted consent by operation of Section 4.38(3) of the EP&A Act.

IN1 – General Industrial

The objectives of the IN1 zone are to:

- *To provide a wide range of industrial and warehouse land uses.*
- *To encourage employment opportunities.*
- *To minimise any adverse effect of industry on other land uses.*
- *To support and protect industrial land for industrial uses.*
- *To protect industrial land in proximity to Sydney Airport and Port Botany.*

The proposed development is consistent with the provisions of the IN1 zone as the proposal will facilitate employment generating development and support a range of industrial and warehouse land uses. More specifically the proposed development will:

- Provide development which complements existing industrial uses by providing a speculative warehouse and CFC for the purposes of distribution;
- Have a positive employment impact generating approximately 361 direct jobs during construction as well as 660 full time equivalent operational jobs;
- Protect industrial land in proximity to Sydney Airport and Port Botany by retaining the existing industrial land use; and,
- Provide development which will reduce any impacts on local residents by presenting opportunity for effective management of the interface between residential and industrial activity in the local area.

SP2 Infrastructure Zone

The SP2 zone runs through the northern portion of the Site and reflects the location of a Sydney Water stormwater culvert and easement. The objectives of the SP2 zone are as follows:

- *To provide for infrastructure and related uses.*

- *To prevent development that is not compatible with or that may detract from the provision of infrastructure.*
- *To protect and provide for land used for community purposes.*

The warehouse facility includes car parking and offices partially located within the SP2 zone which is not related to the stormwater management system to which this zone relates. Clause 5.3 of MLEP 2011 provides flexibility to allow a use that is permitted on one side of a zone boundary to occur on the immediate other side if this would enable a more logical and appropriate development of the site. This clause applies to land that is within 20m of a boundary between any two zones. The proposal relies on Clause 5.3 to facilitate the proposed development.

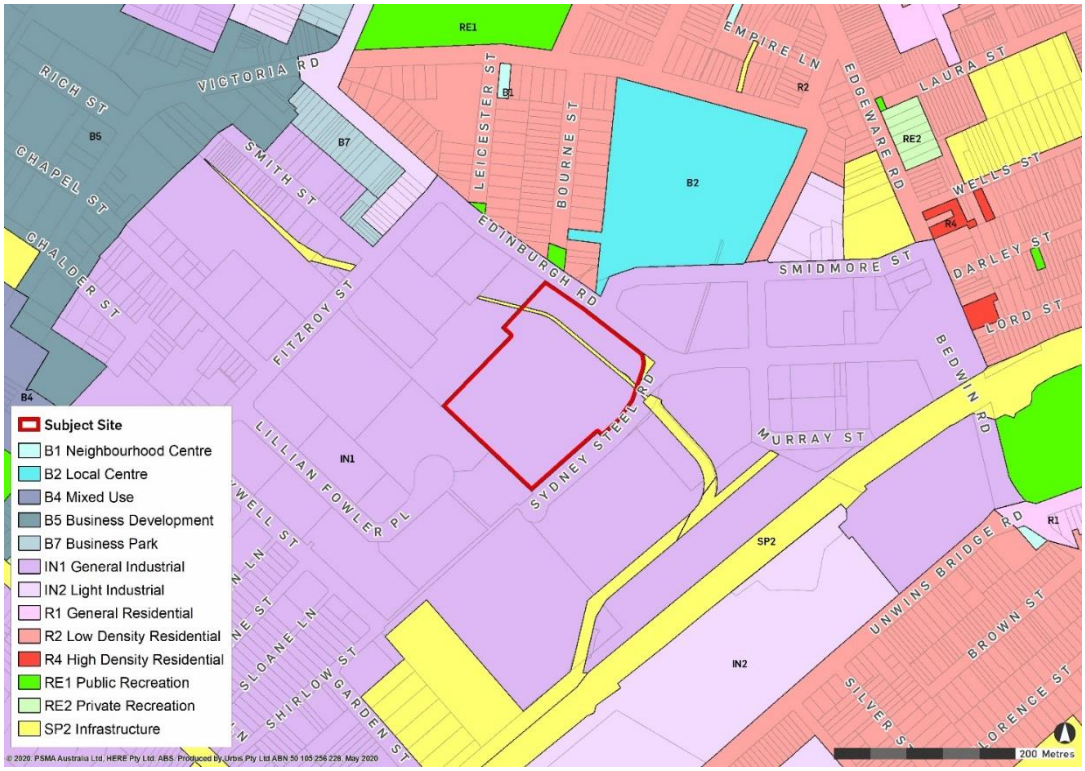
In accordance with Clause 5.3(4)(a), the proposed development is consistent with the objectives of the SP2 zone by protecting the Sydney Water culvert and allowing for ease of access for maintenance and upgrade works to the benefit of the local community.

As discussed in the Sydney Water Asset Review Report prepared by MGP (**Appendix S**) and Feasibility Section 73 Notice of Requirements Letter (**Appendix U**), Woolworths are currently in discussion with Sydney Water to facilitate a satisfactory engineered solution. In order to comply with Sydney Water's building over stormwater asset policy, it may be required to adjust the existing stormwater system to be adjusted to allow construction of the proposed building. Importantly, most of the development is sited towards the rear of the Site and in the north-east corner of the Site, away from the stormwater easement. A hardstand parking area is proposed at-grade with building above, which will enable access for maintenance and upgrade works.

In accordance with Clause 5.3(4)(b), the carrying out of the proposed development is desirable due to compatible land use planning, infrastructure capacity and other planning principles relating to the efficient and timely development of land. The SP2 zone runs directly through the Site. Building over the asset is the only feasible solution for reasonable development of the Site.

Development in the SP2 zone primarily relates to car parking and a small portion of the office component. The benefits of carrying out the development are considered to outweigh the minor encroachment into the SP2 zone given most of the Site and surrounds are zoned IN1 General Industrial.

Figure 13 Zoning Map



Source: Urbis / MLEP

6.12.2. Additional Permitted Uses

Schedule 1 of MLEP also identifies additional permitted land uses on the Site. In accordance with Clause 3A of Schedule 1, the following uses are permissible on the Site:

> *3A Use of certain land at 74 Edinburgh Road, Marrickville*
>
> *(1) This clause applies to land at 74 Edinburgh Road, Marrickville, being Lot 202, DP 1133999 in Zone IN1 General Industrial.*
>
> *(2) Development for the purposes of a garden centre and hardware and building supplies is permitted with consent.*

The proposal does not seek to rely on these additional permitted uses.

6.12.3. Key Development Standards

The proposed development has been assessed against the relevant development standards contained within the MLEP 2011 and is discussed in Table 10 below.

Table 10 MLEP 2011 Compliance of Development Standards

Development Standard	**Control**	**Proposed**	**Complies**
2.7 Demolition requires development consent	The demolition of a building or work may be carried out only with development consent.	Consent is sought for the demolition of existing buildings and structures on site.	Yes
4.3 Height of Buildings	Not specified.	The proposed development will have a maximum height of 32.32m.	Yes
4.4 Floor Space Ratio	0.95:1	The proposed development will have a total gross floor area of 39,093sqm (1.39:1), based on a total site area of 28,090sqm. A Clause 4.6 variation request has been prepared to address the provisions of Clause 4.4 in relation to the proposed FSR variation. This is included at **Appendix V.**	No Refer to **Appendix V.**
5.3 Development Near Zone Boundaries	Consent may be granted to development of land for any purpose that may be carried out in the adjoining zone, but only if the development is not inconsistent with the objectives for development in both zones, and the carrying out of the development is desirable due to compatible land use planning,	The car park and office use are permissible in the SP2 Zone as 'development near zone boundaries' under Clause 5.3 of the MLEP 2011. See Section 6.12.2 for further discussion.	Yes

Development Standard	Control	Proposed	Complies
	infrastructure capacity and other planning principles.		
5.10 Heritage Conservation	Conserve the environmental heritage of Marrickville including the significance of heritage items and heritage conservation areas, archaeological sites, Aboriginal objects and Aboriginal places of heritage significance.	The Site does not contain a heritage item and is not located in a heritage conservation area. Notwithstanding this a Heritage Impact Statement has been prepared by Urbis and included at **Appendix G.** An Aboriginal Objects Due Diligence Assessment has also been prepared and an AHCA is currently underway (**Appendix P**).	Yes
6.1 Acid Sulfate Soils	Development consent is required for works below the natural ground surface and works by which the water table is likely to be lowered.	Class 2. An assessment of potential surface and groundwater impacts associated with the development is provided in the Stage 2 Site Investigation Report included at **Appendix R.**	Yes
6.3 Flooding	Minimise the flood risk to life and property associated with the use of land.	The Site is located within a flood planning area. A Flood Impact Assessment has been prepared by Richmond + Ross and included at **Appendix W.** Refer to Section 8.11 for further discussion.	Yes
6.4 Terrestrial Biodiversity	Maintain terrestrial biodiversity by protecting native fauna and flora, ecological processes and encouraging the conservation and recovery of native fauna and flora.	The Site is not identified as containing biodiversity significance. A Biodiversity Development Assessment Report Waiver request has been prepared by Eco Logical. A BDAR waiver has been issued for the Site. The BDAR waiver request and waiver are contained in **Appendix O.** Refer to Section 6.2 for further discussion.	Yes
6.5 Development in areas	Prevent certain noise sensitive developments from being located near the Kingsford Smith Airport and its flight paths. Ensure	The proposal is for a warehouse facility and associated offices. It is	N/A

Development Standard	Control	Proposed	Complies
subject to aircraft noise	development in the vicinity of the airport does impact on the operation of the airport.	not considered a sensitive land use.	
6.6 Airspace operations	Provide for the effective and ongoing operation of the Kingsford Smith Airport by ensuring that such operation is not compromised.	The proposed development has a maximum height of 32.32m. It will not penetrate the Limitation or Operations Surface.	Yes

6.13. DRAFT CONSOLIDATED INNER WEST LOCAL ENVIRONMENTAL PLAN

Following the amalgamation of Leichardt, Ashfield and Marrickville Councils, Inner West Council have released a draft Inner West Local Environmental Plan 2020 (**draft Inner West LEP 2020**) which consolidates these LEPs into one document.

Under the draft LEP, the following provisions apply to the Site:

- Zoning: IN1 General Industrial;
- Maximum building height: Not specified
- Maximum floor space ratio: 0.95:1
- Minimum lot size: N/A
- Acid sulfate soils: Class 2
- Heritage: N/A
- Terrestrial biodiversity: N/A
- The above provisions are consistent with the existing MLEP 2011.

6.14. MARRICKVILLE DEVELOPMENT CONTROL PLAN 2011

Clause 11 of the SRD SEPP states that development control plans do not apply to State Significant Development.

Notwithstanding, the *Marrickville Development Control Plan 2011* (**MDCP 2011**) has been considered as a reference point for the detailed design including local design considerations such as local character, waste management, access, loading and parking and transport considerations. As per Council's submission, specific consideration has been given to Part 6 – Industrial Development.

A summary of key MDCP 2011 provisions relevant to the development is discussed in Table 11**.**

Table 11 MDCP 2011 Compliance

Section	Response
2.1 Urban Design	The proposed development has been designed with regards to the urban design principles including structure and connections, accessibility, complementary land uses, appropriate density, legibility, activation, sense of place and character.

Section	Response
2.3 Site and Context Analysis	A Site and Context Analysis has been prepared by Nettleton Tribe (**Appendix C**). This was used to understand the existing conditions of the site and surrounds and inform the detailed design of the development. consideration has been given to existing and future development within the vicinity of the Site including the Sydney Metro 'Dive' site and Marrickville Metro Shopping Centre. Consideration has also been given to existing and future pedestrian and cycle links.
2.5 Equity of Access and Mobility	An Access Report has been prepared by Morris Goding (**Appendix X**) and BCA Report has been prepared by McKenzie Group (**Appendix Y**). Refer to Section 8.16 for further discussion.
2.6 Acoustic and Visual Privacy	An Acoustic Report has been prepared by Acoustic Logic (**Appendix Z).** Refer to Section 8.10 for further discussion.
2.7 Solar Access and Overshadowing	Solar access diagrams have been prepared by Nettleton Tribe and included at **Appendix C.** Refer to Section 8.4.2 for further discussion.
2.8 Social Impact Assessment	A Social and Economic Impact Assessment has been prepared by Hill PDA and included at **Appendix K.** Refer to Section 8.18 for further discussion.
2.9 Community Safety	A Social and Economic Impact Assessment has been prepared by Hill PDA and included at **Appendix K.** Refer to Section 8.18 for further discussion.
2.10 Parking	The Site is in Parking Area 3. Parking must comply with the following rates: ▪ Industries; light industries; Warehouse and distribution centres - 1 per 200m^2 GFA for customers & staff. ▪ Office premises: 1 per 60m² GFA for staff & visitors. The proposed development includes the following: ▪ 30,136m^2 warehouse and distribution centre; and ▪ 8,979m^2 office space associated with the warehouse and distribution uses. The proposed development requires 300 parking spaces. 371 staff spaces are proposed, including eight disabled parking spaces, which satisfies this requirement and is therefore appropriate. Proposals must meet minimum requirements for the parking of service and delivery vehicles. ▪ Industrial - One truck space per 800m² GFA up to 8,000m² GFA plus one truck space per 1,000m² thereafter. ▪ Other - One service vehicle space per 2,000m² (50% of spaces adequate for trucks)

Section	Response
	The DCP does not strictly apply to the proposed development. As outlined in the Transport, Traffic and Parking Assessment included at **Appendix H**, the proposal provides an appropriate level of parking for the site and therefore does not generate additional GFA. Refer to Transport, Traffic and Parking Report prepared by CBRK at **Appendix H** and Section 8.5 for further discussion.
2.10.13 Bicycle Parking	Development must comply with the following bike parking facilities: ▪ Warehouse and distribution centres: 1 per 150m^2 GFA for staff; 1 per 1000m2 GFA for bulky goods premises customers. ▪ Office premises: 1 per 200m^2 GFA for staff + 1 per 750m^2 GFA for visitors for premises over 1000m^2 GFA. ▪ Lockers: 1 per 3 staff spaces ▪ Showers (staff and students): 1 + extra on merit. The DCP rates require 257 bicycle spaces. CBRK have undertaken an assessment and consider strict compliance would result in an over-provision of spaces due to the nature of the proposed development. Most future employees will work shift hours and due to safety reasons, will travel to work via car. By comparison, the Austroads guidelines recommend bicycle parking provisions of one space per 200m² and one space per 500m² for office and industrial uses (respectively). Based on these rates, the development would require 106 bicycle spaces. Bicycle parking is proposed for 106 bicycles in accordance with these requirements. Showers and lockers are also proposed. Refer to Section 8.5 for further discussion.
2.10 Motorcycle Parking	Motorcycle parking will be accommodated within the at-grade parking area at the front of the Site.
2.12 Signs and Advertising Structures	An assessment of the proposed signage has been undertaken against SEPP 64 (see Section 6.8). The proposed signage achieves a high level of design quality and is compatible with the architectural design of the warehouse and office building and the character of the streetscape. The proposed signage does not dominate or detract from the architectural features of the building. The proposed business identification sign is consistent with the Woolworths corporate logo and colours and is compatible with the external materials and finishes of the building to avoid adverse impacts on the streetscape.
2.13 Biodiversity	A BDAR waiver (**Appendix O**) was issued by the NSW DPIE and OEH. It was determined on the 9 September 2020 that a BDAR is not required as part of this SSDA.
2.16 Energy Efficiencies	An ESD Report has been prepared by WSP and is included **Appendix L**. This report provides further detail on how the overall planning and design of the building has incorporated energy efficiencies and ESD principles. Refer to Section 8.7 for further discussion.

Section	Response
2.17 Water Sensitive Urban Design	A key initiative of the ESD Strategy submitted at **Appendix L** is to use water efficiently, protecting local water resources and reducing flooding, drought and water pollution. Water sensitive urban design (WSUD) to reduce stormwater run-off and water pollution will be implemented in accordance with the Inner West Council DCP provisions. WSUD measures include: ▪ Rainwater tanks; ▪ Gross Pollutant Traps; ▪ Filter Cartridges.
2.18 Landscaping	A Landscape Plan and Strategy has been prepared by Site Image and is submitted at **Appendix J.**
2.20 Tree Management	An Arboricultural Impact Appraisal and Method Statement has been prepared by Naturally Trees and included at **Appendix I.** Refer to Section 8.6.1 for further discussion.
2.21 Site Facilities and Waste Management	A Waste Management Plan has been prepared by Land and Groundwater Consulting and included at **Appendix M.** Refer to Section 8.12 for further discussion.
2.22 Flood Management	A Stormwater Management Plan and Flood Management Plan has been prepared by Richard + Ross and included at **Appendix W** and **AA.** Refer to Section 8.11 for further discussion.
2.24 Contaminated Land	A Stage 2 Site Investigation Report has been prepared by JKE and included at **Appendix R.** Based on the findings of the investigation, JKE are of the opinion that the Site is suitable for the proposed development.
2.25 Stormwater Management	A Stormwater Management Plan has been prepared by Richmond + Ross and included at **Appendix AA.** Refer to Section 8.11 for further discussion.
Part 6 Industrial Development	
6.1.2 Built form and character	The proposed development has an FSR of 1.39:1 which exceeds the LEP standard of 0.95:1. A Clause 4.6 variation request justifying the proposed variation has been prepared and submitted at **Appendix V.** The proposed height is consistent with the height of other industrial buildings in the immediate vicinity. The development has been designed to achieve a coherent site layout that provides a functional, efficient, and attractive working environment whilst minimise any adverse environmental effects on surrounding land uses.
6.1.2.6 Building design and appearance	The proposed warehouse and office have been designed by architects, Nettleton Tribe to achieve a high standard of development both in terms of design and finish. The proposed development will enhance the streetscape by replacing ageing and outdated warehouse buildings with an architecturally designed warehouse and office development.

Section	Response
6.2 Industrial/Residential Interface	The Site is in an industrial zone, surrounded by predominantly industrial land uses. Notwithstanding this, an assessment of the impacts of the development on nearby residential amenity has been undertaken with consideration of hours of operation, traffic and parking, noise, air pollution, waste collection, safety and security. These matters are discussed further in **Section 8**.
6.2.2 Noise and vibration generation	An Acoustic Report (**Appendix Z)** and Preliminary Noise and Vibration Management Plan (**Appendix HH**) has been prepared by Acoustic Logic**.** Refer to **Section 8.10** for further discussion.
6.2.3 Environmental protection	An Odour and Air Quality assessment has been undertaken by Northstar Air Quality and included at **Appendix BB.** Refer to **Section 8.9** for further discussion.
8. Heritage	A Heritage Impact Statement has been prepared by Urbis and included at **Appendix G.** An Aboriginal Objects Due Diligence Assessment has also been undertaken by Urbis. An ACHA is currently underway, due to be completed in December 2020 (see **Appendix P**). Refer to **Section 8.2** for further discussion.

6.14.1. Sydney Steel Precinct

The MDCP identifies the Site as being located within the Sydney Steel Precinct. The desired future character of the area is:

1. To protect the identified Heritage Items within the precinct.

2. To protect the integrity and on-going retention of the existing industrial zoned land, particularly those identified as being of State significance.

3. To retain the existing employment generating land uses.

4. To ensure new development is compatible with the operations of Sydney Airport.

5. To protect significant streetscapes and/or public domain elements within the precinct including landscaping, fencing, open space, sandstone kerbing and guttering, views and vistas and prevailing subdivision patterns.

6. To enhance existing streets and encourage pedestrian activity, where appropriate, through improvements to road infrastructure and landscaping.

7. To support pedestrian and cyclist access, activity and amenity including maintaining and enhancing the public domain quality.

8. To facilitate efficient parking, loading and access for vehicles that minimises impact to streetscape appearance, commercial viability and vitality and pedestrian safety and amenity.

The proposed development is consistent with the desired future character of the Sydney Steel Precinct for the following reasons:

- The Site does not contain a heritage item and is not located in a Heritage Conservation Area. As outlined in the Heritage Impact Statement prepared by Urbis at **Appendix G,** the proposed development respects the industrial history and character of the place and will not obstruct or impact the vicinity heritage items in any way.
- The development will provide an employment generating land use and is expected to generate approximately 361 direct construction jobs and 660 operational jobs;

- The development protects the integrity of the existing industrial area by retaining the existing industrial use and proposing the construction of a warehouse and distribution facility which is permissible with consent in the IN1 zone and consistent with the zone objectives and surrounding development;
- The proposed development will not exceed the Obstacle Limitation Surfaces for Sydney Airport;
- While the proposal will require the loss of existing trees and vegetation to accommodate the proposed building footprint, a comprehensive landscaping strategy has been prepared to enhance the existing streetscape and improve views to the Site when viewed from surrounding residential and heritage conservation areas;
- The proposal supports pedestrian and cyclist activity by providing on-site bicycle parking and end of trip facilities for staff; and,
- The proposed car parking and vehicular access has been designed to facilitate efficient parking, loading and access for vehicles whilst minimising impacts to the streetscape appearance and pedestrian safety and amenity. Separate vehicular access for staff and delivery vehicles has been provided to enhance the safety of staff and pedestrians.

6.15. MARRICKVILLE SECTION 94/94A CONTRIBUTIONS PLAN 2014

The Site is subject to the Inner West Council's contributions requirements under the *Marrickville Section 94/94A Contributions Plan 2014* (**Contributions Plan 2014**). The levy aims to assist the funding of public facilities and future infrastructure needs to address the needs of the growing population.

As per the Contributions Plan 2014, Section 94 contributions are applicable to all development where there would likely be an increase in demand for public facilities and services. Section 94 contributions are generally applicable to industrial developments that involve an increase in floor space, in the demand for parking or in the demand for any other type of public facility and service.

The Applicant does not seek to enter into a Voluntary Planning Agreement with Council but rather will pay the required contribution fees under the Contributions Plan 2014.

The development will include upgrades to the pedestrian and cycle paths along Sydney Steel Road, Edinburgh Road and provide a new signalised intersection at Edinburgh Road. These works will be delivered by the Applicant at no cost to Council.

7. CONSULTATION

7.1. COMMUNITY CONSULTATION

An Engagement and Community Outcomes Report has been prepared by Urbis and included at **Appendix E.** The Report documents the engagement and communications process, feedback received and considerations in response to feedback undertaken for Woolworths during June and July 2020.

Various strategies were implemented to ensure collaborative community involvement in the project. Including stakeholder meetings, community information sessions, fact sheets, letterbox drops, community information sessions, feedback hotline and email. Specific consultation actions undertaken are summarised in Table 12 below.

Table 12 Summary of Community Consultation Activities

Activity	Content	Date
Fact Sheet	A fact sheet was prepared to outline key features of the proposal and invite members of the community to provide feedback. The fact sheet advertised details of a dedicated email and phone number, managed by Urbis Engagement, and an invitation to attend a community information session to further understand the proposal. A copy of the fact sheet and distribution catchment can be found in **Appendix E.**	The fact sheet was distributed on Thursday 2 July 2020 to the mailboxes of approximately 1,298 households within the Marrickville Customer Fulfilment Centre catchment area.
Community Information Session	One three-hour information session was held on Saturday 18 July 2020 at the proposed site of the customer fulfilment centre. There were seven registrations for the session and four attendees. The information boards outlining key project facts displayed at the information session are provided in **Appendix E.**	One three-hour information session was held on Saturday 18 July 2020 at the proposed site of the customer fulfilment centre.
Information Website	As part of the consultation process, and to ensure access to specialised information regarding the proposal was readily available, a dedicated project website was developed and published. Located at www.74edinburghroad.com, the website provided information about the proposed development application, the planning process and contact details to obtain more information. The project website will remain open until the SSDA is determined, to keep stakeholders informed. There were 463 unique visitors to the information website, with the average session duration 1minute and 59 seconds. A copy of the information website is found at **Appendix E.**	N/A

Activity	Content	Date
Social Media Advertising	The proposal was advertised on Facebook and Instagram from 15 July to 19 July 2020. The advertisement was geotargeted to ages 18 - 65 within 2km radius to 74 Edinburgh Rd, Marrickville. 9418 people were reached throughout the campaign and 320 people clicked through to the website.	The proposal was advertised on Facebook and Instagram from 15 July to 19 July 2020
Feedback Survey	A feedback survey was created and located on the information website for stakeholders and the community to provide their thoughts and feedback and understand community sentiment. The survey sought to understand current trends in shopping online, areas of importance regarding the proposal, areas of opportunity and challenges. 19 respondents provided their details to be kept updated regarding the proposal. There were 38 responses to the survey. A copy of the survey results as of 29 July 2020 is found at **Appendix E.**	N/A
Stakeholder and Community Briefings	A briefing request was sent to identified stakeholders, including community groups, offering the opportunity to meet with members of the project team and learn more about the proposal. The following groups were contacted via email on 1 July 2020 and provided an overview of the proposal, a copy of the fact sheet and information about the forthcoming Community Information Session. ▪ Bike Marrickville ▪ The Inner West Bicycle Coalition ▪ We Love Marrickville ▪ Inner West Mums - Sydney ▪ West Connex Action Group ▪ Marrickville Public School ▪ Camdenville Public School ▪ Camdenville Public Pre-school ▪ St Peters Public School ▪ Anchor Church Sydney	The stakeholder groups were contacted on 1 July 2020. The Marrickville Manufacturers Association requested a briefing which was held on Thursday 9 July 2020. Additionally, a briefing with Transport for NSW and Inner West Council was held on 20 July 2020 to discuss the proposal and receive feedback.

Activity	Content	Date
	▪ St Pius V Church ▪ Goodstart Early Learning Marrickville ▪ Marrickville Chamber of Commerce ▪ Marrickville Manufacturers Association The following stakeholders were invited to meet for a face to face briefing: ▪ Marrickville Chamber of Commerce ▪ Marrickville Manufacturers Association ▪ Bike Marrickville ▪ The Inner West Bicycle Coalition ▪ We love Marrickville ▪ West Connex Action Group. At the time of writing this report, the Marrickville Manufacturers Association requested a briefing which was held on Thursday 9 July 2020. Additionally, a briefing with Transport for NSW and Inner West Council was held on 20 July 2020 to discuss the proposal and receive feedback. A detailed summary of feedback has been outlined in Section 6 of **Appendix E.**	
Engagement Email and Phone Number	Members of the public were invited to contact Urbis Engagement through a dedicated 1800 phone number and/or an email address between 2 July and 30 July 2020. At the time of writing this report, one enquiry had been received via email.	2 July to 30 July 2020.

The community consultation strategy and all content (responses) received throughout the engagement phase are included at **Appendix E**. A summary of the matters raised by the community during the consultation that relate to the SSDA and the proposal's response is included in Table 13.

Table 13 Summary of Responses to Community Consultation Matters

Themes	Feedback	Response
Overall observations	▪ Moderate level of interest from the local community and stakeholders during the consultation process. ▪ Concern amongst respondents regarding impact on traffic and	▪ A State Significant Development Application (SSDA) will be lodged with the Department of Planning, Industry, and Environment (DPIE) in August 2020.

	parking in surrounding streets for residents. ▪ Enquiries received regarding anticipated truck and vehicle movements. ▪ General queries about the planning process including the approval pathway, timeframes and staging of construction. ▪ Clarification sought on the name of the proposal 'Customer fulfilment centre'. ▪ Positive feedback received regarding employment opportunities. ▪ Positive feedback received on sustainability initiatives. ▪	▪ Pending approval, construction is anticipated to commence in 2021. ▪ Woolworths is committed to keeping near neighbours informed about its college operations and project plans and providing easy and available ways to provide feedback.
Site suitability	▪ Feedback was received that the proposal was consistent with surrounding uses. ▪ Feedback was received that the site could be used for residential and open space purposes, recreational and social activities.	▪ The proposal is consistent with the historic use of the site for industrial purposes and surrounding land use.
Traffic, parking, and access	▪ Concerns from residents regarding current traffic and parking conditions, and cumulative impacts surrounding development and infrastructure projects. ▪ Enquiries received about the anticipated truck and vehicle movements in the late evening and overnight. ▪ Queries about the fulfilment centre's traffic management plan and how this will be implemented. ▪ Concern regarding increased job capacity and how this will affect traffic in the local area. ▪ Questions were received regarding Woolworths green travel policy and	▪ Woolworths will implement a Transport, Traffic and Parking Plan which will be monitored and enforced around the fulfilment centre precinct. ▪ Extensive investigations and reports are being completed as part of the planning process and a comprehensive Traffic Management Plan will be developed for the project. ▪ Woolworths will be including an active travel plan as part of the EIS to the Department of Planning, Industry and Environment. ▪ Employees will be encouraged to consider active travel to travel to and from work. Sydenham Station and St

	how employees are encouraged to walk or use public transport to reduce traffic. ▪ Questions were received regarding Woolworths Traffic Management plan and how this is implemented. ▪ Queries regarding additional parking for employees on site. ▪ Suggestions were received regarding the increase of bike parking on site to increase active transport for employees.	Peters Station are in close walking distance. ▪ 370 spaces will be provided on site for staff and visitors. ▪ Loading and delivery access will be via Sydney Steel Road (from Bedwin Street and Princes Highway), minimising impact on existing traffic networks. ▪ Private vehicle access will be via the existing signalised intersection on Edinburgh Road, and via the Sydney Steel Road entry.
Pedestrian and cycleways	▪ Enquiries received regarding the anticipated pedestrian and cycle movements and the opportunity to improve the shared path located at the end of Sydney Steel Street connecting to Shirlaw Street. ▪ Enquiries received in relation to sightlines and intersection of cyclist and vehicle access points on Sydney Steel Road. ▪ Feedback received on separation of cyclists, pedestrians, and vehicles.	▪ Improvements to the public domain include shared pedestrian and cycleway along Sydney Steel Rd connecting the walkway to Sydenham Station, and along Edinburgh Rd. ▪ Woolworths has consulted with the Inner West Council in relation to the proposal and the connection to existing and future cycleways.
Operations	▪ Concerns raised regarding pollution emitted from the operations. ▪ Enquiries received whether customers could collect orders from the distribution centre. ▪ Queries received whether there is any light pollution emitted from the proposal.	▪ An acoustic report will be prepared and submitted as part of the EIS to the Department of Planning, Industry and Environment.
Employment opportunities	▪ Enquiries received regarding the anticipated type of employment opportunities and the anticipated impact on the local labour force. ▪ Positive feedback received on the prospect of local employment opportunities.	▪ The proposal will generate 650 will support up to 650 ongoing jobs and a further 750 jobs throughout the construction phase. ▪ Woolworths to provide response to pay/conditions.

	▪ Queries were received about the employment pay and conditions.	
Design	▪ Positive feedback was received regarding the architectural design and the consistency with the local character. ▪ Comments were noted about the façade facing Sydney Steel Rd and the risk of graffiti on the façade. ▪ Comments were noted regarding the possibility of the office building facing Sydney Steel Rd to contribute to passive surveillance. ▪ Questions were received regarding the proposed height of the new building.	▪ Woolworths has engaged leading architectural firm Nettleton Tribe to prepare the concept and detailed designs for the project. ▪ The overall design has considered architectural appearance and landscape treatment to provide an attractive street presentation and public domain. ▪ The architecture, materiality and colour choice were inspired by the local character of Marrickville. ▪ The height of the building is consistent with neighbouring properties including the new Marrickville Metro development adjacent to this proposal.

7.2. GOVERNMENT AGENCIES AND OTHER STAKEHOLDERS

The Applicant and Project Team has engaged with the relevant Government agencies throughout the preparation of the SSDA. Relevant comments received from the agencies are outlined in Table 14.

Table 14 Summary of Feedback from Government Agencies

Agency / Meeting Details	**Matters Raised**	**Applicant Response**
Inner West Council *Meeting – 8th July 2020*	**Traffic and Parking** ▪ Support the signalised intersection at Edinburgh and Smidmore Street. Agree it is a good outcome and provides appropriate access to parking on the site. ▪ Agree the proposed access is safe and presents an opportunity to make a dedication of land for the widening of Edinburgh Road + better street address to Edinburgh Road. ▪ Bike route along Edinburgh Road is a critical link along Sydney Steel Road. Would like to see bicycle	A Traffic, Parking and Access Report has been prepared by CBRK and included at **Appendix H.** Access to the development is proposed from Edinburgh Road and Sydney Steel Road, consistent with the previously approved DA (DA 2015/00168). The main access to the site is proposed via a fourth signalised approach to the Edinburgh Road/Smidmore Street intersection. Driveways are also proposed from Sydney Steel Road, for service vehicles and as secondary access to the main car park.

Agency / Meeting Details	Matters Raised	Applicant Response
	route along Sydney Streel Street resolved. ▪ Intersection at Edinburgh Road and Sydney Steel Road to be converted to a roundabout to improve bus movements. ▪ Considered when discussing with RMS and developing bike route paths around the site. ▪ Bike path along Sydney Steel Road. **Flooding** ▪ Require a Flood Study and Flood Risk Management Report to ensure the proposed development will not divert flood waters. Address flood controls in DCP. ▪ **Sydney Water** ▪ Consult with Sydney Water regarding Sydney Water assets.	A Flood Risk Management Plan has been prepared by Richmond + Ross and included at **Appendix W.** The assessment considers the flood controls in MDCP 2011. Consultation has occurred with Sydney Water regarding the Sydney Water assets that traverse across the Site. This is discussed in the Sydney Water Building Plan Approval Assessment and Assets Options Report included at **Appendix S.**
	Strategic Planning ▪ Support proposed land uses – eager for employment to thrive. **Landscaping** ▪ Landscape plans required. Consider mature tree planting on the site and urban tree canopy cover. Look for opportunities to enhance the bike path and integrate sensitive WSUD. **Land Uses and Operations** ▪ Provide information on the relationship between office and warehouse premise. Demonstrate	A Social and Economic Report has been prepared by Hill PDA and included at **Appendix K.** A Landscape Design Report and Plans have been prepared by Site Image and included at **Appendix J.** Refer to Section 6.12.1 for further discussion on the relationship between

Agency / Meeting Details	Matters Raised	Applicant Response
	the office is ancillary and being used for the same purposes ie. tenants of the warehouse component. **Floor Space** ▪ Justify floor space exceedance.	the office and warehouse premises Refer to Section 6.12.3 and Clause 4.6 included at **Appendix V.**
Sydney Water *Email – 30 July 2020* *Meeting – 25th September 2020*	On the 30th July 2020, MGP sought advice from Sydney Water. On 4th September 2020, Sydney Water issued a Sydney Water Feasibility Letter of Advice. A copy of this advice is provided at **Appendix T.** In summary: **Sewer** ▪ Multiple 225 mains are located within the site and are available for connection. Some may be disused. Others will require protection or deviation. ▪ A 660x990 Brick oviform wastewater main traverses the site and this must be either protected or the main deviated around the proposed building. ▪ Site is at low ground level and subject to risk of surcharge from wastewater network in wet weather. ▪ Any work on the wastewater assets will need to be assessed by SAP ground within Sydney Water. A concept plan is recommended detailing new invert levels and grades of affected assets and is requested to be submitted as soon as possible prior to any Section 73 application.	Refer to **Appendix S, T** and **U.**

Agency / Meeting Details	Matters Raised	Applicant Response
	▪ This information must be submitted in order to avoid delays in the Section 73 application **Water** ▪ Sydney Water have assessed the proposed water requirements and confirm that there're multiple existing DN 150 water mains available for connection. Any connection will need to be separately approved by Sydney Water via Sydney Water's Tap-In application / approval system. Additionally, the developer must investigate the ability of the water network to provide fire fighting requirements of the development. **Stormwater** ▪ Sydney Water objects to the current proposal as it does not comply with current Sydney Water's building over and adjacent to Sydney Water stormwater assets policy and guidelines. Please see Letter of Advice for further details. ▪ Sydney Water will require Building Plan Approval to be approved prior to the issue of the development construction certificate to ensure any affected Sydney Water asset is suitably protected by the proposed building work on the site. Application for Building Plan Approval can be made through MGP or directly to Sydney Water via Tap-In. Our Building Plan Approval team at MGP is able to assist you with this process if you are referred to a Water Service Coordinator (WSC). ▪ Where Sydney Water assets are to be adjusted, installed or protected,	

Agency / Meeting Details	Matters Raised	Applicant Response
	Sydney Water have provided guidelines which outline the process. On 25th September 2020, a meeting was held with a representative of Sydney Water. A preliminary agreement was reached for the diversion of the stormwater alignment and easement adjustments. Woolworths Group have suggested deviating the stormwater culvert asset that currently runs through the proposed development. Stormwater culvert diversion plans were submitted to Sydney Water on the 14th October 2020 for review and comment. The Applicant continues to be in discussion with Sydney Water to provide an in-principal stormwater deviation concept plan. No adjustment to the overall fabric of the building is anticipated.	
Fire and Rescue NSW (FRNSW) *Meeting – 23rd January 2020* *Meeting – 23rd January 2020* *Email – 16 June 2020*	A meeting was held at Fire and Rescue NSW on the 23rd January 2020. Prior to lodging this SSDA, FRNSW were notified of the Scoping Report during the SEARs submission. FRNSW provided the following comments: *"FRNSW have reviewed the documentation that was provided in support of the development and will not be providing comment at this time as there is currently insufficient information available regarding the fire safety and emergency response management aspects of the project.* *We request that we be given the opportunity to review and provide comment once approvals have been granted and the project has progressed such that there is more relevant detailed information available.*	Noted.

Agency / Meeting Details	Matters Raised	Applicant Response
	As additional details become available Fire & Rescue NSW requests to be consulted with respect to the proposed fire and life safety systems and their configuration at the project's preliminary and final design phases. *While there is currently no requirement for a fire safety study, FRNSW may request one be undertaken at a later stage should information be provided such it is deemed that the development poses unique challenges to the response to and management of an incident."*	
Sydney Metro *Meeting - 20 July 2020* *Meeting - 3 August 2020*	Two briefings were held with Transport for NSW (Sydney Metro) and Inner West Council to discuss the proposal and its relationship to the Sydney Metro site adjacent. The meeting on the 20th July 2020 was attended by representatives of Inner West Council. The Applicant presented the proposed scheme for 74 Edinburgh Road and discussed the proposed traffic strategy for the site, forecast traffic loads, CPTED approach and street activation. The meeting concluded agreeing to schedule a meeting with the Project Architect and Traffic Engineer in attendance. A second meeting was held on 3rd August 2020 with Sydney Metro, representatives of Inner West Council, Urbis and Project Architect. In addition to discussing the matters above, further details on the traffic approach were discussed, with a view to adjust the existing traffic light access at the intersection of Sydney Steel Road and Smidmore Street, and retaining the existing roundabout operation on the corner of Sydney Steel Road and Edinburgh Road. Whilst Sydney Metro	No existing proposal to upgrade the Sydney Steel Road/ Edinburgh Road intersection. It is currently operating as a roundabout and no development is proposed or approved which would require the signalisation of this intersection.

Agency / Meeting Details	Matters Raised	Applicant Response
	tabled plans for an expansive redevelopment of their DIVE site, it was acknowledged that a Rezoning Submission would not be lodged in the near future. Sydney Metro acknowledged the need for them to resolve the road network for Edinburgh Road from Edgeware Street, through to Victoria Street. The Applicant responded by confirming it is only proposed to redevelop the site in a way that had a reduced traffic impact than the previously approved Masters scheme, consistent with the underlining zoning of the site.	
Ausgrid *Email – 25th August 2020*	On 25th August 2020, Shelmerdines Consulting Engineers contacted Ausgrid for comment on the proposed development. On 16th September 2020, Ausgrid verbally advised the load will require two off feeders connected to Marrickville Zone Substation and two off 2x1500kVA chamber substations.	Refer to **Appendix JJ.**
NSW Food Authority *Email – 31st August 2020*	On 31st August 2020, the NSW Food Authority advised via email correspondence the following: *As discussed on the phone this morning, we do not have any comments about this proposal at this stage.* A copy of this correspondence is provided at **Appendix CC.**	No response required.
Environment, Energy and Science Group (EES) *Email – 12 August 2020*	On 12 August 2020, EES advised they had no additional comments. They advised they will provide comments to the Planning and Assessment Group during the exhibition of the SSDA. A copy of this correspondence is provided at **Appendix DD.**	No response required.

8. KEY IMPACTS ASSESSMENT

8.1. BUILT FORM AND URBAN DESIGN

The proposed development has been designed to present as an integrated warehouse and office building with a maximum height of 32.32m. The proposed built form of the warehouse is modular due to the nature of the proposed use and extent of plant equipment required for the operation of the warehouse and CFC. The warehouse is located towards the rear of the Site, set back approximately 3m from Edinburgh Road by the office with a generous setback for landscape screening, acoustic buffering and vehicle manoeuvring within the staff carpark. This is in keeping with surrounding context and helps keep un-activated facades away from low density residential and retail uses.

The office component has been sited towards the corner of Edinburgh Road and Sydney Steel Road to activate the street frontage, improve the Site's interface with the residential area to the north and provide a visual and acoustic buffer. This location also provides opportunities for improved passive surveillance to the surrounding public domain.

The office exterior will incorporate various elements to articulate the building façade without compromising the required functionality of the internal office spaces. Materials include a curtain wall with spandrel, precast concrete, vertical aluminium screening, a feature face brick wall and timber soffits. The warehouse building exterior will comprise predominantly precast concrete. A stainless-steel wire mesh screen also wraps around the northern façade to subtly screen the building from the corner of Sydney Steel and Edinburgh Road.

Internally, voids have been carved out at different levels to create outdoor recreation areas for staff. An atrium separating the office and warehouse components is proposed to allow more natural sunlight penetrating into office space. Horizontal sun-shading is also proposed to control heat gain whilst vertical sun-shading is proposed at an angle on western facade to control winter sun.

The entrance lobby to the office has been orientated towards Sydney Steel Road. Floor to ceiling clear glazing provides a prominent street address and activates the Site. The ground floor of the building is set back from Edinburgh Road behind a landscaped garden which enhances the streetscape character along Edinburgh Road and provides a place of respite for future employees and visitors.

The proposed building height is considered comparable to existing and emerging development within the vicinity of the Site. To the north-east of the Site is Marrickville Metro Shopping Centre which consists of two levels of retail and two levels of carpark. Adjacent to proposed Site is '76 The Borough' which contains a five-storey commercial building.

The proposed design has been informed by ten key principles. These include:

Context and Location

Nettleton Tribe have undertaken an investigation into the distinctive character of the local area, including prominent natural and built features, social, economic, and environmental conditions and the overall built environment. The proposed design seeks to respond sensitively to these factors and make a positive contribution to the streetscape, neighbourhood and neighbouring sites. The design has also considered the future desired character of the area and its interfaces.

Landscape

The proposed landscape design seeks to integrate with the built form. The landscape design recognises the Site's prominent location at the intersection of Sydney Steel Road and Edinburgh Road and has sought to enhance the landscape character along both street frontages.

Functionality and Quality

The design seeks to balance the needs of future tenants efficiently and effectively. Internal spaces have been made as flexible and as adaptive as possible to minimise possible future modifications. Materials have been selected based on their quality and durability with particular regard to weather implications to ensure the quality of the finished form and its life cycle into the future.

Community

The design responds to the local community context and wider social context. The proposed warehouse and office will create employment opportunities for the community and encourage diverse social interaction.

Sustainability

The design has considered a sustainable landscape in an urban setting and sought to improve and organise the existing urban realm and streetscape whilst responding to the desired future character. The built form and function have considered practical and effective sustainable measures, relating to shading, ventilation, power generation and water.

Amenity

The proposed development will provide a variety of uses and support the internal and external amenity of future tenants by delivering a high-quality built form with external 'break out' spaces for staff. The office component has been purposely located in the north-east corner of the Site to enhance views from Edinburgh Road, establish a street presence, improve passive surveillance and maximise views from the internal offices.

Legibility

The built form has a clear identity. The proposed warehouse and office have been clearly delineated for ease of operations and use. Access for staff and delivery vehicles has been separated with clear wayfinding signage.

Safety

Safety has been considered throughout the design process to minimise risk and harm to future tenants and the surrounding community. Heavy vehicle access is proposed off Sydney Steel Street, away from Edinburgh Road and the non-industrial interface. Employee car parking entries are separated away from heavy vehicles to minimise conflict between vehicle movement of different class.

Aesthetics

The design has considered the above principles to deliver a building that responds to site constraints whilst embracing opportunities. The arrangement of built form has been considered in its broader context with the development seeking to locate the warehouse component away from the interface with adjoining residential areas. The design has addressed the varying scales and from of the building in the selection and association of materials and colour.

Figure 14 Photomontage of proposed warehouse as viewed from corner of Sydney Steel Road and Edinburgh Road

Source: Nettleton Tribe

8.2. ANALYSIS OF FEASIBLE ALTERNATIVES

This section discusses the consideration of feasible alternatives to the carrying out of the proposed development as per clause 7(1)(c), Part 3, Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (**EP&A Regulation**). Five options for the proposal were considered to address the project objectives, site constraints and opportunities. These include:

- Scenario 1 – 'Do nothing';
- Scenario 2 - Warehouse on ground with employees parking and ancillary office over;
- Scenario 3 - Office component adjacent to the neighbouring commercial building with on-grade parking for employees
- Scenario 4 - Warehouse component setback from Edinburgh Road, carpark and office component fronting the Site

8.2.1. Scenario 1 - Do Nothing

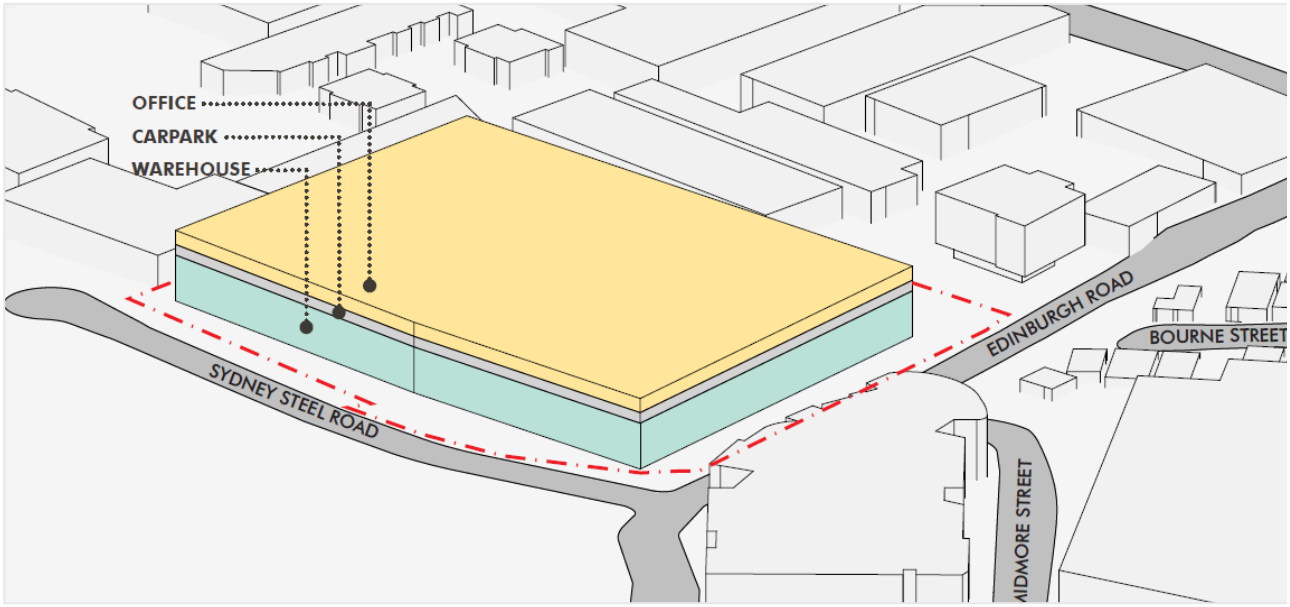
The 'do nothing' scenario is not a feasible development option for the Site. Woolworths Group Limited have looked at a number of property solutions in Sydney's south and inner west. However there have been no other suitable freehold opportunities that have come to market in the last three years. Woolworths Group Limited also require a leasehold beyond 15 years to make the proposal viable.

No future development on the Site provides minimal benefit to both Woolworths Group Limited and Woolworths customers. It would constitute a gross under-development of a valuable site within Marrickville.

8.2.2. Scenario 2 - Warehouse on ground with employees parking and ancillary office over

This option considered a warehouse at ground level with employee parking and ancillary office located above (see Figure 16). The benefit of this concept is that all proposed land uses are permissible with consent in the IN1 General Industrial Zone, it involves a simple and economical construction and meets the project brief. However, this option resulted in a poor ground floor interface with the street, involved building over the existing stormwater easement and resulted in a poor presentation to Edinburgh Road.

Figure 15 Scenario 2



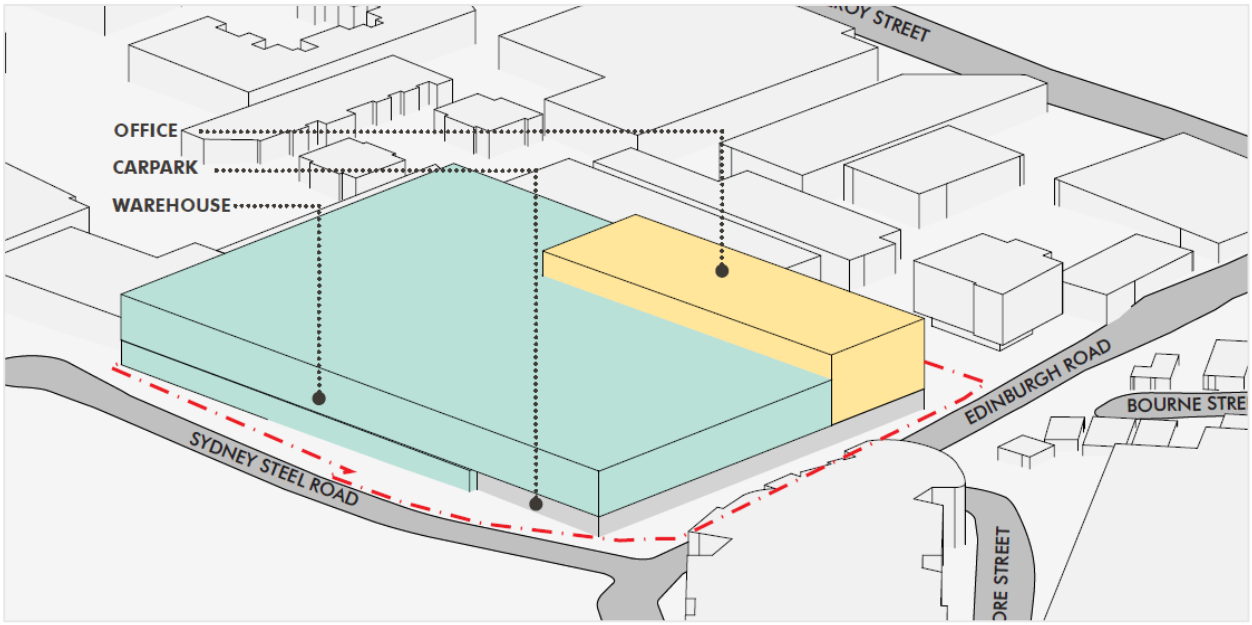
Source: Nettleton Tribe

8.2.3. Scenario 3 – Office component adjacent to the neighbouring commercial building with on-grade parking for employees

This option considered constructing the office component adjacent the neighbouring commercial building and warehouse to the east of the site (see Figure 16). The benefit of this option is that it allows opportunities to improve ground floor amenity and easy access to the carpark for employees.

Notwithstanding the above, locating the office component to the east of the Site does not maximise the opportunity to provide views towards the CBD and presents a poor streetscape presentation to the corner of Edinburgh Road and Sydney Steel Road. It would also involve building over the existing stormwater easement.

Figure 16 Scenario 3

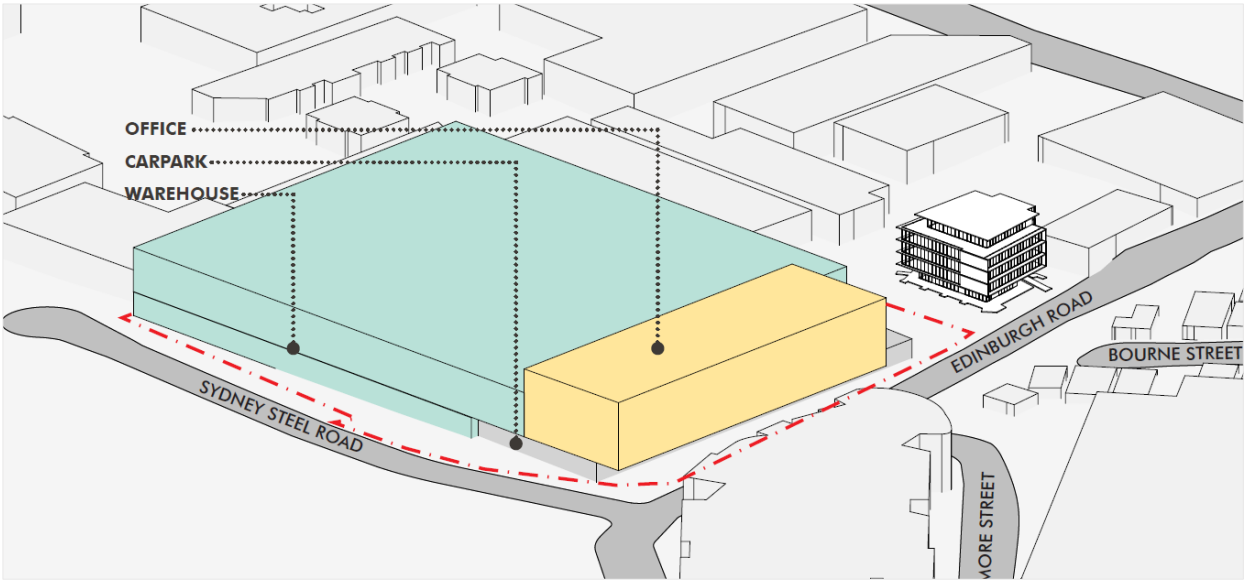


Source: Nettleton Tribe

8.2.4. Scenario 4 - Warehouse component setback from Edinburgh Road, carpark and office component fronting the site

This option is the preferred option. It involves constructing a two-storey warehouse, set back behind an office located on the corner of Edinburgh Road and Sydney Steel Road. Similar to Scenario 4, the benefit of this option is that it improves the relationship of the Site with the nearby residential area, increases opportunities to improve ground floor amenities and the building presentation to the street, provides easy on-grade access to a car park for staff and satisfies the project brief. However, this option does exceed the floor space ratio (**FSR**) permitted under MLEP 2011.

Figure 17 Scenario 4



Source: Nettleton Tribe

On balance, it is considered that Scenario 4 is the best design and land use outcome for the Site, providing a building form and layout which respects and responds to the context of the Site at the periphery of the industrial area, and will support approximately 660 FTE jobs on the Site which are consistent with the objective of the land supporting employment generating uses.

8.3. HERITAGE

8.3.1. European Heritage

A Heritage Impact Statement (**HIS**) has been prepared by Urbis and submitted at **Appendix G.** In accordance with the SEARs, the HIS contains an assessment of potential impacts on State and local heritage items in the surrounding area.

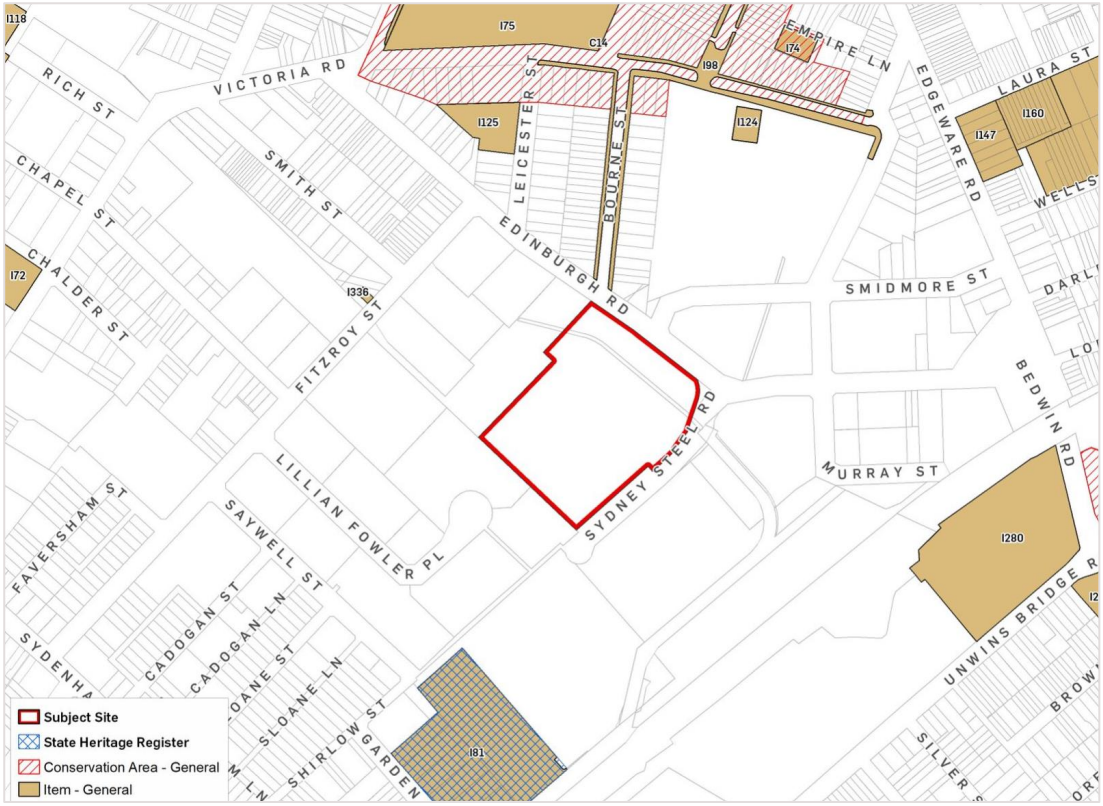
Assessment

The Site

The Site has been progressively developed with warehouse buildings over time. The office building to the Edinburgh Road frontage which dated to pre-1943 was demolished in c.2018. The only other structure dating to this period is a small warehouse centrally located on the Site which is expected to have been substantially altered over time as it has been enveloped by later warehouse additions.

The Site has been assessed against the criteria for assessing heritage significance as set out by the Heritage Council of New South Wales. The Site does not meet the requisite threshold for heritage listing at a local or State level under any of the criteria. There are no elements of heritage significance located within the Site and the existing built improvements are not considered to warrant retention on heritage grounds.

Figure 18 Heritage context of the site showing the Site outlined in red



Source: Urbis / MLEP 2011

- Surrounding Heritage

The Site is located within the vicinity of the following heritage items:

- Item 81 under the Marrickville LEP 2011, Flood storage reserve and brick drain (Sydenham Pit and Drainage Pumping Station 1) – also listed on the NSW State Heritage Register as SHR 01644; and
- Item 98 under the Marrickville LEP 2011, Brick paving.

These heritage items are not typical built heritage items in the sense that they are pieces of infrastructure and not a common building typology for the area. The flood storage reserve heritage item is physically distanced from the Site and does not have any critical interfaces or visual relationship with the Site. The heritage listing and curtilage for this State significant item will be retained and will not be impacted by the development.

The brick paving heritage item located to the north-east of the Site along Bourne Street will not be affected physically or visually by the proposal.

The proposed development does not seek to replicate the detailing of the vicinity heritage items, rather it has been designed with regard for the existing industrial character of Marrickville. The proposed scale of the new building is consistent with the scale and overall built form of other warehouse buildings in the area and therefore will not detract from the character of the area or have any adverse heritage impacts.

The proposed materiality has been carefully considered within the heritage context and responds to the dominant materiality cues which contribute to the industrial character of Marrickville including face brick and metal cladding. Heritage items in the broader vicinity of the Site comprise predominantly dwellings and conservation areas. None of these heritage items or conservation areas will be physically or visually impacted by the proposal.

Mitigation Measures

No mitigation measures are proposed.

Conclusion

In summary, the HIS concludes the proposed development respects the industrial history and character of the place and will not obstruct or impact the vicinity heritage items in any way.

8.3.2. Aboriginal Heritage and Archaeology

Urbis have prepared an Aboriginal Objects Due Diligence Assessment (**ADD**) (**Appendix P).** The ADD was produced based on the Aboriginal and non-Aboriginal cultural heritage requirements provided in the SEARs. The ADD was prepared to investigate whether the proposed development will have the potential to harm Aboriginal objects and/or places that may exist within the subject area and inform the proposed development of any Aboriginal archaeological and heritage constraints. The assessment was prepared in accordance to the Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (DECCW, 2010) ('Due Diligence Code') and concluded:

- There are no Aboriginal sites/objects/places registered within the subject area.
- The subject area is located within 200m of a natural tributary of the Cooks River, suggesting a moderate to high potential for Aboriginal objects.
- The nearest registered Aboriginal site to the subject area is AHIMS ID# 45-6-2654 is a Potential Archaeological Deposit (PAD) located approximately 900m to the south-west adjacent to the same ephemeral waterway as the subject area.
- The subject area has been the subject of moderate to high ground disturbance by historical land use.
- The subject area is in the Birrong Soil Landscape, a soil landscape of considerable depth. The depth of which may limit the impacts of historical ground disturbance to the upper soil profile.
- Due to the depth of the soil landscape and proximity to water, it is considered that the subject area has moderate to high archaeological potential.

Urbis is currently undertaking an Aboriginal Cultural Heritage Assessment (**ACHA**) in accordance with the recommendations of the ADD and in response to the Aboriginal Cultural Heritage Requirements provided in Attachment A of the SEARs requirements. The ACHA is being undertaken in accordance with the following guidelines:

- *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (Department of Environment, Climate Change and Water (DECCW, 2010) (the Consultation Guidelines).
- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (Office of Environment and Heritage 2011) (the Assessment Guidelines).
- *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010).
- The Australia ICOMOS Charter for Places of Cultural Significance, The Burra Charter, 2013 (Burra Charter.

A copy of the draft ACHA is provided at **Appendix P.** It is anticipated that the final ACHA report will be completed in December 2020, prior to the determination of the SSDA.

8.3.3. Historical Archaeological

Assessment

Urbis have prepared a Historical Archaeological Assessment (**HAD**) (refer to **Appendix EE**). The HAA established that the proposal has:

- Low potential to impact on State significant archaeological resources related to the early colonial occupation of the subject site and its industrial development throughout the late 19th century.
- Low-moderate potential to impact on locally significant silt (air raid) trenches within the north-eastern portion of the subject site.
- Moderate-high potential to impact on locally significant industrial waste incorporated within imported fill.

- Moderate-high potential to impact on locally significant archaeological resources related to MML's lengthy occupation of the site.
- With the exception of the silt (air raid) trenches, which can be located precisely in historical aerials, the potential for the above identified historical archaeological resources is ubiquitous across the subject area.

Mitigation Measures

- Recommendation 1 – Archaeological Monitoring

Following the approval of the SSDA and parallel with the commencement of earthworks in areas of proposed bulk excavation and defined as having potential for archaeological resources, archaeological monitoring works should be undertaken to ensure no potential relics are harmed during the works. The monitoring will be applied to identify any potential relics during earthworks and will decide if sub-section 4 of the below detailed Chance Find Procedure is required.

- Recommendation 2 – Archaeological Chance Find Procedure

In areas identified as having low potential for archaeological resources and for the construction of pylons, although considered highly unlikely, should any archaeological deposits be uncovered during any site works, a chance find procedure must be implemented. The following steps must be carried out:

1. All works stop in the vicinity of the find. The find must not be moved 'out of the way' without following the steps below.
2. Site supervisor, or another nominated site representative must contact either the project archaeologist (if relevant) or DPIE to contact a suitably qualified archaeologist.
3. The nominated archaeologist examines the find, provides a preliminary assessment of significance, records the item and decides on appropriate management.
4. Depending on the significance of the find, reassessment of the archaeological potential of the subject area and further archaeological investigation may be required in the form of test or salvage excavation.
5. Works in the vicinity of the find can only recommence upon relevant approvals from DPIE.

- Recommendation 3 – Human Remains Procedure

In the unlikely event that human remains are uncovered during any site works, the following must be undertaken:

– All works within the vicinity of the find immediately stop.

– Site supervisor or other nominated manager must notify the NSW Police and DPIE.

– The find must be assessed by the NSW Police, and may include the assistance of a qualified forensic anthropologist.

– Management recommendations are to be formulated by the Police, DPIE and site representatives.

– Works are not to recommence until the find has been appropriately managed.

Conclusion

In summary, the archaeological impact assessment has established that with the exception of the silt (air raid) trenches, which can be located precisely in historical aerials, the potential for the above identified historical archaeological resources is ubiquitous across the subject area.

8.4. AMENITY

8.4.1. View and Visual Impact

Assessment

In accordance with the SEARs, a Visual Impact Assessment has been prepared by RobertsDay (**Appendix FF**), with consideration of potential impacts on nearby public and private receivers and significant vantage points in the broader public domain, including Edinburgh Road and Sydney Steel Road.

RobertsDay undertook a site inspection on the 29th July at 3;00pm to better understand the existing visual character of the area. A number of locations were inspected to evaluate the scenic qualities and visual prominence of the Site from these key locations. A qualitative assessment of the visual impacts and changes to the landscape have been undertaken based on the following guidelines:

- *RMS Environmental Impact Assessment Guidance Note: Guidelines for landscape character and visual impact assessment* (2013); and,
- *The Guidance for Landscape and Visual Impact Assessment (GLVIA), Third Edition (2013)* prepared by the Landscape Institute and Institute of Environmental Management and Assessment; and
- *Visual Representation of Development Proposals, Technical Guidance Note 02 (2017).*

The determination of visual impacts is based on the following criteria:

- Sensitivity
  - Sensitivity is defined as "The sensitivity of a landscape character zone or view and its capacity to absorb change'' (EIA No4 Guidelines, 2013, RMS).
  - The visual sensitivity of a view is defined by the nature of the view and its duration. A higher visual sensitivity is given to views which would be seen for longer, by a higher numbers of potential viewers and where visual amenity is important to viewers.
- Magnitude
  - Magnitude is defined as "The measurement of the scale, form and character of a development proposal when compared to the existing condition" (EIA No4 Guidelines, 2013, RMS).
  - Magnitude reflects the degree of visual contrast between the proposal and the existing landscape setting. In the case of visual assessment this also relates to how far the proposal is from the viewer.

The combined assessment of sensitivity and magnitude provides an overall rating of the visual impact.

The key vantage points have been determined by identifying the physical absorption capacity and visibility of the Site with a focus on areas that are more likely to be affected by the proposal. This includes nearby public and private receivers and significant vantage points in the broader public domain (see Figure 19). The key vantage points analysed include:

- 56 Victoria Rd, Marrickville;
- 80 Victoria Rd, Marrickville;
- 80 Edinburgh Rd, Marrickville;
- 54 Edinburgh Rd, Marrickville;
- 12 Murray St, Marrickville; and
- Sydney Steel Road.

Figure 19 Key viewpoints

Source: RobertsDay

Viewpoint 1 – 56 Victoria Road, Marrickville

The aim of assessing Viewpoint 1 is to understand the visual impact of proposed built form when viewed from Enmore Park and the residential area to the north, to assess to what degree the existing structure and buildings screen or disguise the future development and determine the extent to which the change of built elements may alter the existing view (see Figure 20).

Sensitivity

There is a general cluster of structures along Bourne Street and Edinburgh Road, including buildings, cable lines, utilities, and landscape detractors. This view has limited visual value. However, there is higher pedestrian activity due to the existing low-density dwellings and Enmore Park. Therefore, the sensitivity of the viewpoint is considered **moderate**.

Magnitude

The magnitude of the proposal in this view is considered **low** as the proposed development is largely screened by existing structures and vegetation. The proposal constitutes only a minor component of the view which might be missed by the casual receptor and there is no effect on the overall quality of the scene.

Conclusion

The visual impact for this view is assessed as **low**.

Figure 20 Viewpoint 1: Existing and Proposed View from 56 Victoria Road

Picture 13 Existing View

Picture 14 Proposed View

Source: RobertsDay

Viewpoint 2 – 80 Victoria Road, Marrickville

Similar to Viewpoint 1, the aim of assessing this view is to understand the visual impact of the proposed built from when viewed from Enmore Park and the residential area to the north (see Figure 21).

Sensitivity

As discussed above, there is already a general cluster of structures along Leicester Street, including buildings, cable lines, utilities and landscape detractors. This view has limited visual value and the Site is not in close proximity. However, there is higher pedestrian activity due to the existing low-density dwellings and Enmore Park. Therefore, the sensitivity of the viewpoint is considered **moderate**.

Magnitude

The magnitude of the proposal in this view is considered negligible as the proposal is in the distance and completely screened by the existing buildings and vegetation. There will be **no change** in the view.

Conclusion

The visual impact for this view is assessed as **none.**

Figure 21 Viewpoint 2: Existing and Proposed View from 80 Victoria Road

Picture 15 Existing View

Picture 16 Proposed View

Source: RobertsDay

Viewpoint 3 – 80 Edinburgh Road, Marrickville

The aim of assessing the view is to understand the visual impact of the proposed built form when viewed from the main road (see Figure 22).

Sensitivity

The view from 80 Edinburgh Road is considered to have low sensitivity as receptors are mostly motorists that are passing through, therefore have short term views and are less likely to notice, appreciate or concentrate on views. There are also landscape detractors including utility poles and structures. This view has **limited** visual value.

Magnitude

The magnitude of the proposal in this view is considered **moderate** as the proposal is partly screened by existing vegetation and mature trees along Edinburgh Road. Whilst the proposal forms a visible new element, it is consistent with the existing industrial character of the precinct.

Conclusion

The visual impact for this view is assessed as **low.**

Figure 22 Viewpoint 3: Existing and Proposed View from 80 Edinburgh Road

Picture 17 Existing View

Picture 18 Proposed View

Source: RobertsDay

Viewpoint 4 – 54 Smidmore Street, Marrickville

The aim of assessing the view is to understand the visual impact of the proposed development when viewed from the main road (see Figure 23).

Sensitivity

The view from 54 Smidmore Street is considered low sensitivity are receptors are mostly motorists that are passing through, therefore have short term views and are less likely to notice, appreciate or concentrate on views. There are landscape detractors including utility poles and structures. The public view has **limited** visual value.

Magnitude

The magnitude of the proposal in this view is considered **moderate** as the proposed development is partly screened by existing vegetation and mature trees along Smidmore Street. Whilst the proposal forms a visible new element, it is consistent with the existing industrial character of the precinct.

Conclusion

The visual impact for this view is assessed as **low**.

Figure 23 Viewpoint 4: Existing and Proposed View from 54 Smidmore Street

Picture 19 Existing View

Picture 20 Proposed View

Source: RobertsDay

Viewpoint 5 – 12 Murray Street, Marrickville

The aim of assessing this view is to understand the visual impact of the proposed built from when viewed from the main road (see Figure 24).

Sensitivity

The view from 12 Murray Street is considered to have low sensitivity as receptors are mostly motorists that are passing through, therefore have short term views and are less likely to notice, appreciate or be concentrating on views. There are landscape detractors including utility poles and structures. The public view has **limited** visual value.

Magnitude

The magnitude of the proposal in this view is considered negligible as the proposal is in the distance and completely screened by the existing vegetation. There is **no change** in the view.

Conclusion

The visual impact for this view is assessed as **none**.

Figure 24 Viewpoint 5: Existing and Proposed View from 12 Murray Street

Picture 21 Existing View

Picture 22 Proposed View

Source: RobertsDay

Viewpoint 6 – Sydney Steel Road, Marrickville

The aim of assessing the view is to understand the visual impact of the proposed development when viewed from Sydney Steel Road (see Figure 25).

Sensitivity

The view from Sydney Steel Road is considered to have **low** sensitivity as Sydney Steel Road is a cul-de-sac with limited number of receptors, the street has a predominantly industrial character and there are landscape detractors including utility poles and existing warehouses. This public view has limited visual value.

Magnitude

The magnitude of the proposal in this view is considered **moderate** as the proposal is largely screened by existing vegetation and mature trees along Sydney Steel Road. Whilst the proposal forms a visible new element, it is consistent with the existing industrial character of the cul-de-sac.

Conclusion

The visual impact for this view is assessed as **low.**

Figure 25 Viewpoint 6: Existing and Proposed View from Sydney Steel Road

Picture 23 Existing View

Picture 24 Proposed View

Source: RobertsDay

Mitigation Measures

RobertsDay have reviewed the proposed architectural plans and note a number of design measures have been implemented to mitigate the potential visual impacts. These include:

- High quality landscaping and well located screen planting to reduce the visual impact in close proximity.
- Use of native planting to reinforce the character of the existing vegetation.
- Facade treatment and articulation to reduce the height impact.
- Material and colour selection that blend with the surrounding environment and reduce the visual impact.
- No additional mitigation measures are required.

Conclusion

Overall, the visual impacts assessed from multiple viewpoints surrounding the Site result in impacts considered to be **low/none**. This is mostly due to the highly industrial nature of the surrounding area and the compact urban configuration with limited open views towards the Site.

Where visible, the proposal is consistent with the surrounding character and has a positive visual impact due to its site coverage, generous setbacks, location of car parking, high quality landscaping along public roads, façade design, building articulation and high-quality materials.

8.4.2. Overshadowing

Assessment

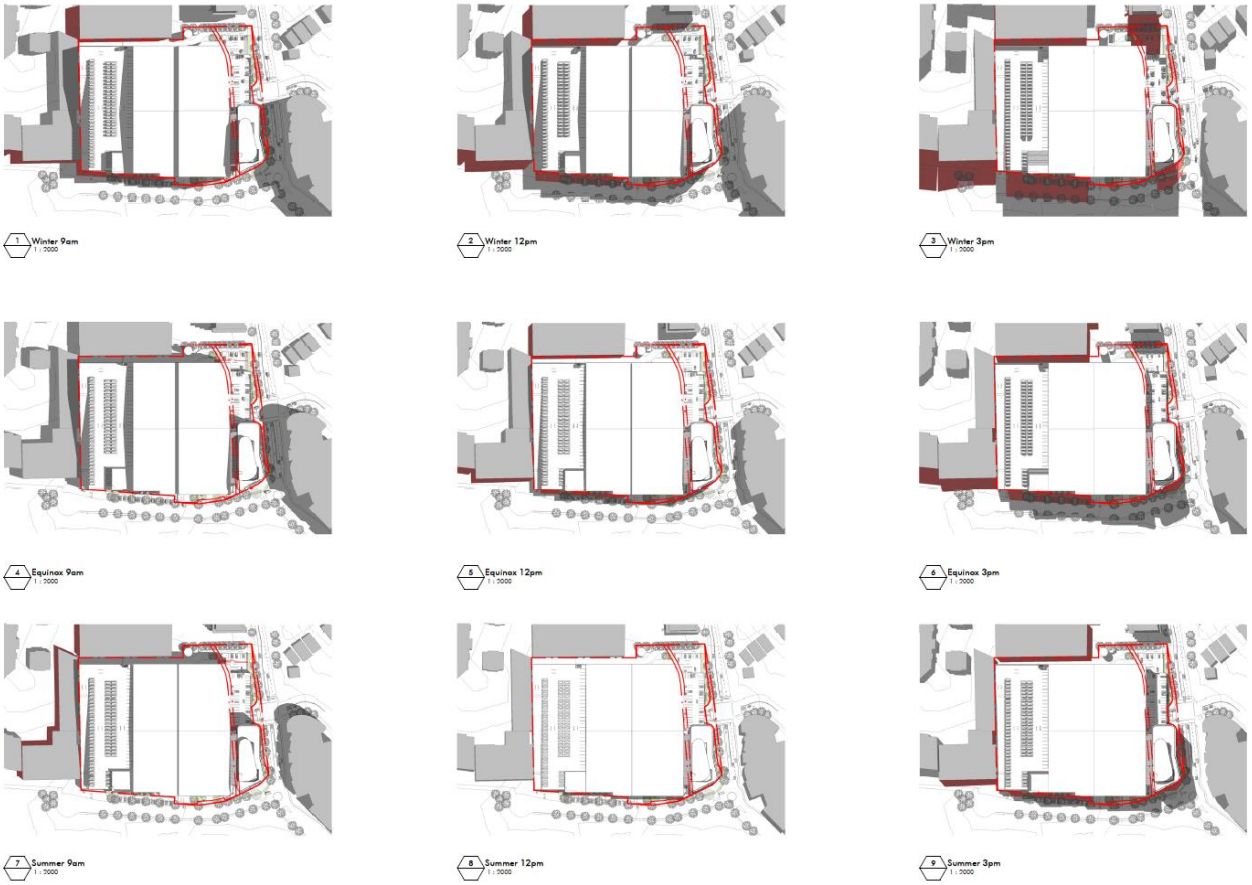
As discussed, the Site is located in a general industrial zone surrounded by predominantly industrial land uses. The nearest residential areas are located to the north on the opposite side of Edinburgh Road and to the south-east on the southern side of Unwins Bridge Road.

Opportunities for adverse overshadowing to sensitive residential receivers is limited. Notwithstanding, overshadowing plans have been prepared by Nettleton Tribe and included at **Appendix C.**

Between 9am and 3pm at the winter solstice, the majority of additional shadow is cast over the eastern side boundary (within the site boundary) or over the roadway on Sydney Steel Road. Given the orientation of the site and proposed buildings, there is no additional overshadowing to sensitive residential receivers located to the north of the site.

As evident in the shadow diagrams, the existing buildings on site already overshadow the eastern side boundary and footpath along Sydney Steel Road between 12pm and 3pm on the winter solstice.

Figure 26 Excerpt from Shadow Diagrams



Source: Nettleton Tribe

Mitigation Measures

Maintain proposed building height and envelope as proposed in the architectural drawings included at **Appendix C.**

Conclusion

The proposed shadow impacts are considered acceptable given the majority of shadow falls over the roadway, the site is located in an industrial zone and there is minimal impact on sensitive residential receivers.

8.5. TRAFFIC, ACCESS AND PARKING

A Transport, Traffic and Parking Assessment has been prepared by CBRK and included at **Appendix H.** The report provides details of all traffic types and volumes likely to be generated during construction and operation, assesses the capacity of the surrounding road network and discusses the proposed site access points and parking arrangements.

8.5.1. Traffic

Operational

The development is proposed to operate 24 hours a day, seven days a week. The CFC will operate with overlapping shifts. Customer home deliveries will typically occur during the morning between 5:00am and 8:00am, with vehicles returning later in the morning, and during the afternoon between 1:00pm and 4:00pm, with vehicles returning later in the evening.

Traffic generated by the operation of the proposed development will have its greatest effects during weekday morning and afternoon peak periods when it combines with other traffic on the surrounding road network. Based on surveys of the existing CFC at Mascot, the proposed CFC at Marrickville would have weekday morning and afternoon traffic generations of some 150 vehicles per hour two-way (100 cars plus 50 delivery vans). CBHK have identified bases on operating centres with similar activities the following traffic movement rates:

- Commercial: 0.84 and 0.6 vehicles per hour per 100m2 during weekday morning and afternoon peak hours respectively; and
- Industrial: 0.52 and 0.56 vehicles per hour per 100m2 during weekday morning and afternoon peak hours respectively.

Based on these rates, the offices would have peak period weekday generations of some 60 to 70 vehicles (all cars) and the industrial of some 50 vehicles per hour two-way (some 40 cars and 10 trucks). The proposed development would therefore have a total traffic generation of some 270 vehicles per hour two-way during peak periods, comprising:

- 150 vehicles for the CFC;
- 70 vehicles for the offices; and,
- 50 vehicles for the industrial (spec warehouse).

This generation compares to that assessed for the approved Masters development of some 360 vehicles per hour two-way. The proposed development would therefore have a lower traffic generation than the approved development.

Daily traffic generation of the development would be some 1,700 vehicles per day (two-way), comprising some 1,100 vehicles for the CFC (including 600 cars and 500 delivery vans), 350 vehicles for the offices and an estimated 250 vehicles for the spec warehouse (including 125 cars and 125 trucks).

Estimated numbers of people travelling to the development by public transport and walking/cycling/other modes are some 90 in the peak hours (including some 70 by train/bus and some 20 by walking/cycling/other) and some 450 over the day (including some 350 by train/bus and some 100 by walking/cycling/other). The majority of these (approximately 90% or more) would be associated with the CFC.

Traffic generated by the proposed development will have its greatest effects during weekday morning and afternoon peak periods when it combines with other traffic on the surrounding road network. The observed on-road peak hours were 8:30 – 9:30 am and 4:45 – 5:45 pm.

In order to gauge traffic conditions, counts were undertaken at these times on 21 July 2020 at the following intersections:

- Edinburgh Road/Victoria Road;

- Edinburgh Road/Fitzroy Street;
- Edinburgh Road/Smidmore Street;
- Edinburgh Road/Sydney Steel Road;
- Edinburgh Road/Murray Street;
- Edinburgh Road/Railway Road; and
- Edinburgh Road/Bedwin Road.

The surveyed intersections were analysed using SIDRA for the traffic flows. The analysis found:

- The signalised intersections of Edinburgh Road with Victoria Road, Smidmore Street and Bedwin Street are operating with average delays of less than 28 seconds per vehicle or less during weekday morning and afternoon peak periods. This represents a good level of service.
- The intersection of Edinburgh Road with Smidmore Street (including the new fourth signalised approach) would operate with average delays of less than 30 seconds per vehicle during peak periods. This represents level of service C, a satisfactory level of service.
- The intersections of Edinburgh Road with Fitzroy Street, Murray Street and Railway Road would continue to operate with average delays for the highest delayed movements of less than 20 seconds per vehicle during peak periods. This represents level of service B, a good level of service.
- The intersection of Edinburgh Road with Sydney Steel Road would operate with average delays for the highest delayed movement of less than 20 seconds per vehicle during peak periods. This represents level of service B, a reasonable level of service.

Therefore, with the proposed fourth leg at the Edinburgh Road/Smidmore Street signalised intersection and associated road works, the road network will be able to cater for the traffic from the proposed development.

Construction

The Transport, Traffic and Parking Assessment provides details of the types and volumes likely to be generated during construction of the development.

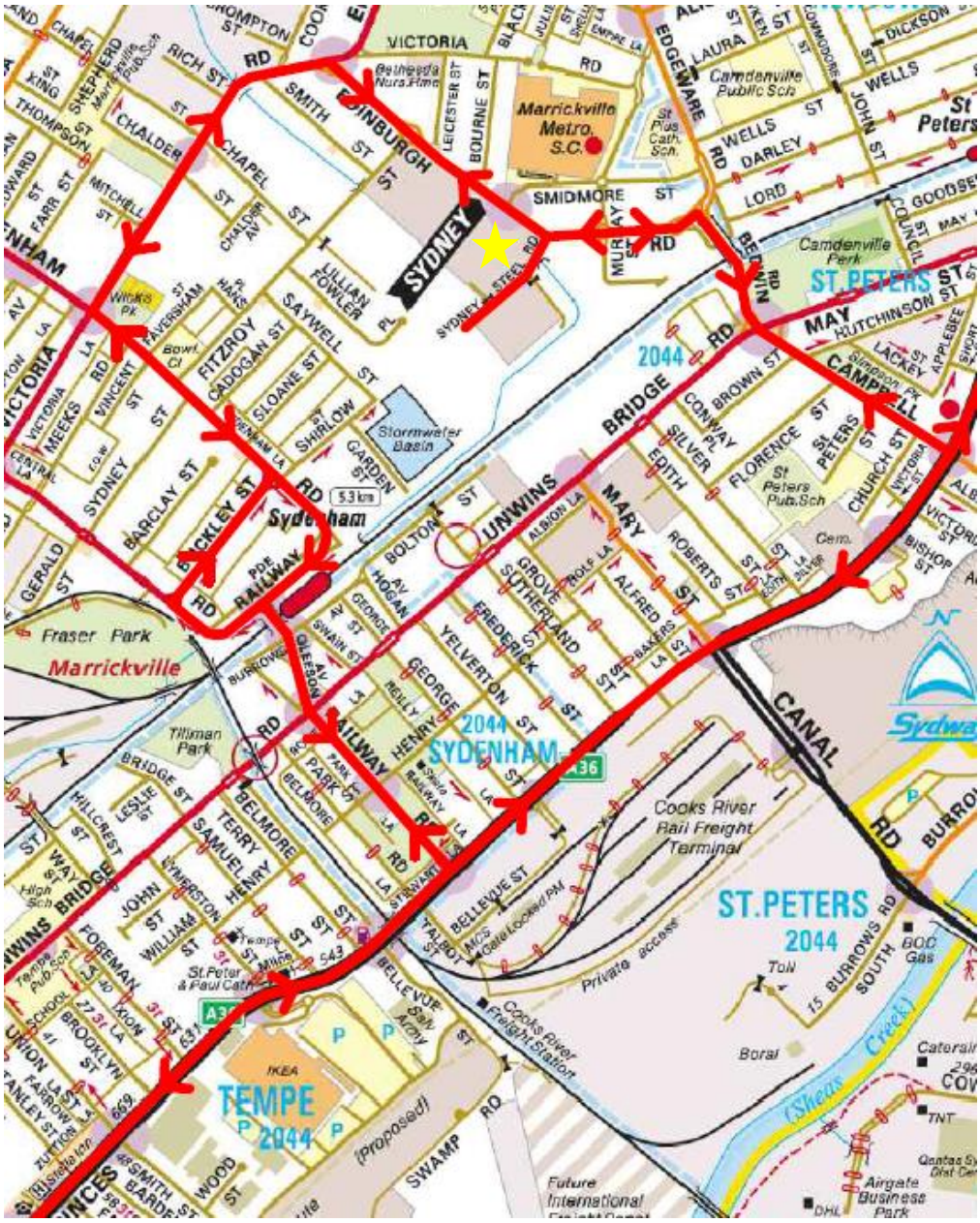
During construction activities, trucks transporting material to the site will be accommodated on the site. Construction vehicles will access the site from Edinburgh Road and Sydney Steel Road. During construction activities, trucks will travel to and from the site along the designated routes identified in Figure 26.

The number of vehicles generated during the various stages of construction is likely to be some 50 to 100 vehicles per hour two-way at peak times (8.30am-9.30am and 4.45pm-5.45pm). This compares to operation traffic generation of some 270 vehicles per hour two-way. The effects of construction vehicle activity on the surrounding road network will therefore be less than the operational effects. The majority of these vehicles will be construction worker vehicles. A small number will be associated with the delivery of materials to the site (up to some 10 trucks per hour), including during concrete pours. Trucks would include rigid trucks up to 12.5 metres long and semi-trailers up to 20 metres long.

As noted in the Traffic Report, the base traffic flows counted on the surrounding road network includes traffic generated from other construction activities in the area, including Sydney Metro and Marrickville Metro. Traffic generation of the subject site during construction is likely to be similar to the existing traffic generation of the site. It should therefore not noticeably affect the operation of the surrounding road network.

Contractor parking and material deliveries during construction will be managed in accordance with the principles for traffic management identified in the draft Construction Traffic Management Plan at **Appendix H.**

Figure 27 Designated Truck Routes (construction)



Source: CBRK

8.5.2. Modal Split

The proposed development will increase employment densities close to existing public transport services, strengthening the existing demand for these services. Journey to work data indicates the following modes of travel to work in this travel zone:

- Vehicle driver – 62%
- Train – 19%
- Vehicle passenger – 9%
- Bus – 4%
- Walking – 3%
- Other – 4%

To minimise car dependency, the proposed development includes upgrades to the pedestrian and cycle network adjacent to the Site. The Site is also located nearby public transport including both buses and trains and will provide bike storage and end-of-trip facilities for use by employees and visitors.

The Site is strategically located to play a key role in the Woolworths distribution network for online orders in the region. Delivery vans typically make 15-20 deliveries as part of their route and are routed to ensure efficiency and minimise vehicle kilometres travelled. In this way, online order fulfilment and delivery significantly reduces the number of vehicle kilometres travelled, compared to individual shoppers visiting a supermarket.

Prior to opening of the facility, Woolworths will advise staff of public transport availability and options for travel, particularly for employees on site during the day. A workplace travel plan will be prepared, which will include the following elements:

- Encourage the use of public transport, including bus services to and through Marrickville at the future Metro service;
- Identify existing bus routes which stop adjacent and close to the site, including the location of bus stops and pedestrian crossings at signalised intersections;
- Work with bus operators to improve services;
- Encourage public transport by employees and visitors through the provision of information, maps and timetables in the site travel plan;
- Raise awareness of health benefits of walking and cycling (including maps showing walking and cycling routes, including adjacent to and near the site); and
- Encourage cycling by providing safe and secure bicycle parking, including the provision of bicycle parking for employees, plus showers and lockers.
-

8.5.3. Parking

Whilst the DCP provisions do not strictly apply to SSDAs, consideration has been given to the car parking rates provided in MDCP 2010. As each location of a CFC differs and there are no established CFC related parking rates, the rates within the MDCP are considered the most relevant and applicable to the proposed development.

As outlined in the Transport, Traffic and Parking Assessment at **Appendix H**, the MDCP 2010 does not provide specific parking provisions for CFC's and therefore the car parking rates for general industrial uses have been applied. The CFC only occupies a part of the warehouse. The ground floor of the warehouse will be used for the purposes of a spec warehouse. As discussed in Section 4, whilst a tenant has not yet been confirmed, the spec warehouse will be occupied by a general industrial use, consistent with the type of land uses that currently exist on the site which include a range of factory, warehouse, and general industrial uses. Accordingly, the parking rate for general industrial uses is considered appropriate.

The proposed development requires a total of 291 spaces including:

- CFC – 108 spaces for the warehouse and 140 spaces for the office
- Spec warehouse – 43 spaces for the warehouse and 10 spaces for the office

The proposed development provides 371 spaces, including eight disabled parking spaces. The majority of car parking for the CFC (324 spaces) is proposed in the two level car park adjacent to Edinburgh Road. 47 spaces are proposed at grade on the southern side of the development.

The proposed parking provision satisfies the DCP requirements and is considered appropriate for the reasons discussed below. Given the nature of the proposed land use and 24/7 operations, most staff will work shifts commencing either the early hours of the morning or night. To ensure the safety of all staff, adequate provision has been made for on-site parking to give staff the opportunity to drive to work in the event they are commencing or finishing work outside standard work hours. Whilst the Site is located in close proximity to public transport, including Sydenham Station, the safety of all staff is paramount to Woolworths and therefore when required, staff will have the opportunity to drive to work and park safely on Site.

8.5.4. Bike Parking

The MDCP 2010 requires a bicycle parking provision of some 257 spaces, which is considered an over-supply based on the proposed use. Consideration has been given to the Austroads guidelines which recommend bicycle parking provisions of one space per 200m² and one space per 500m² for office and industrial uses respectively. These rates are based on a 10% travel mode by bicycle, which is higher than that for the Site.

Based on these rates, the development would require 106 bicycle parking spaces. Bicycle parking is proposed for 106 bicycles in accordance with the Austroad requirements. End of trip facilities are also proposed within the ground floor lobby.

Existing cycle routes are located along Edinburgh Road, connecting to Sydney Steel Road. To improve pedestrian and cycle access, shared pedestrian and cycle paths will be provided along the Edinburgh Road and Sydney Steel Road frontages to the Site. These paths are shown in plans prepared by Nettleton Tribe at **Appendix J.**

8.5.5. Access, Servicing and Layout

Access to the development is proposed from Edinburgh Road and Sydney Steel Road, consistent with the vehicular access arrangements approved under DA/2015/0016. The main passenger vehicle access to the Site is proposed via a fourth signalised approach to the Edinburgh Road/Smidmore Street intersection. Driveways are also proposed from Sydney Steel Road, for service vehicles and as secondary access to the main car park.

The driveway widths will be provided in accordance with the *Australian Standard for Parking Facilities (Part 1: Off-street car parking and Part 2: Off-street commercial vehicle facilities), AS 2890.1:2004* and *AS 2890.2:2018*, to cater for the swept paths of cars and service vehicles.

Loading and service vehicles will access the Site from entry points off Sydney Steel Road. Deliveries to the CFC will be made by semi-trailers up to 20m long. Some 10 to 15 inbound deliveries are expected per day. Deliveries from the CFC will be made by small rigid trucks (6.4m long), generally outside peak times. These vehicles will use a ramp to the upper level from Sydney Steel Road. Service vehicles will enter and exit the site in a forward direction. The speculative warehouse space hardstand has been designed to accommodate vehicle movements to the size of semi-trailers.

The majority of parking will be provided in the proposed two level car park, connected by an internal ramp. Additional parking will be provided at-grade, on the southern side of the warehouse. Parking spaces will be provided with minimum dimensions of 5.4m long by 2.5m wide. Spaces with adjacent obstructions will be 0.3m wider to appropriately provide for doors to open. Disabled spaces will be 2.4m, wide, with a 2.4m wide adjacent area for wheelchairs. These dimensions are considered appropriate, being in accordance with AS 2890.1:2004.

Mitigation Measures

The following mitigation measures are proposed:

- Provision of a fourth signalised intersection approach to the Edinburgh Road/Smidmore Street intersection.
- Separate vehicular access for delivery vehicles and employee parking.

Conclusion

In summary:

- The traffic modelling undertaken demonstrated that the external road network should operate at acceptable levels of service and therefore, the development should not have a detrimental effect on the network operation;
- The proposed development will generate less traffic than the previously approved Masters DA;
- The proposed parking provision is appropriate;

- Access, servicing and internal layout will be provided in accordance with AS 2890.1:2004 and AS 2890.2 – 2002;
- Traffic generation of the proposed development will be less than the approved Masters and industrial development on the site;
- A series of road works is proposed, including:
  - traffic signals for access to the site on Edinburgh Road, at Smidmore Street;
  - Widening of Edinburgh Road to provide two through traffic lanes and right turn bays in both directions; and
  - Upgrades to pedestrian and cycle paths along the Site frontages to Sydney Steel Road and Edinburgh Road.

Subject to undertaking the above works, the road network will be able to cater for the traffic from the proposed development.

8.6. BIODIVERSITY

Assessment

As discussed in Section 6.2, a Biodiversity Assessment Report Waiver Request has been prepared by Ecological Australia and included at **Appendix O.**

A request seeking a waiver for the requirement for a BDAR was submitted to the NSW DPIE on 25th August 2020. This was accompanied by an assessment of the proposal development against the relevant provisions of the *BC Act* and the *Biodiversity Conservation* Regulation 2017.

The assessment determined the proposal is unlikely to have a significant impact on the eight biodiversity values as defined in Section 1.5 of the BC Act and clause 1.4 and clause 6.1 of the BC Regulation. Accordingly, a request to waive the requirement for a BDAR was made.

The NSW DPIE granted a waiver on 9th September 2020 under Clause 7.9 (2) of the BC Act.

Mitigation Measures

No mitigation measures are proposed.

Conclusion

In summary, the proposal will not have any likely impact on the surrounding natural environment and abundance of species, habitat connectivity, threatened species movement and flight paths of protected animals, nor will it impact upon water quality surrounding the site (sustainability).

8.6.1. Tree Removal

An Arboricultural Impact Appraisal and Method Statement has been prepared by Naturally Trees and included at **Appendix I.** The report provides an analysis of the impact of the development on existing trees and provides appropriate management and protective measures.

Assessment

The proposed development requires the removal of 32 trees (23 high category and nine low category). Approval has previously been granted for 83 trees (55 high category trees and 28 low category) under DA 2015/00168.

It is proposed to retain seven trees (one high category tree and six low category trees). Tree 74 is an important tree on the adjoining property, located near an existing kerb and hard surface. It is proposed to demolish the kerb and hardstand and construct a new entry ramp and driveway within its TPZ. These works may cause harm to Tree 74, however all efforts will be undertaken to retain this tree. It is also proposed to retain six low category trees. These trees are located largely outside the Site area and direct impacts are not expected.

The proposal will require the removal of 37 trees or low to very low retention value. None of these trees are considered significant or worthy of retention. 28 of these trees were previously approved for removal. Four trees are exempt from Inner West Council's Tree Management DCP 2020.

The proposal will also require the removal of 78 high category trees, 55 of which were previously approved for removal. These trees are considered moderate to high significance and display good health. The arborist supports their removal subject to tree replacement planting.

Whilst the proposal will require the loss of existing trees and vegetation to accommodate the proposed building footprint, a comprehensive landscaping strategy has been prepared to enhance the existing streetscape and improve views to the Site when viewed from surrounding residential and heritage conservation areas.

Mitigation Measures

The following mitigation measures are required:

- **Protection of retained trees** – as discussed above, it is proposed to retain Tree 74 which is a *Eucalyptus tereticornis* of medium significance. If works occur within the TPZ, tree sensitive construction measures must be implemented as prescribed by AS 4970 – 2009 *Protection of trees on development sites.* Excavation works required to be undertaken within the TPZ should be performed by hand under the supervision of the project arborist. Works are to be carried out in accordance with the Arboricultural Method Statement prepared by Naturally Trees.
- **Replacement planting** – A comprehensive new landscaping scheme is proposed and included at **Appendix J**. The proposed landscaping scheme includes semi-mature trees to be planted in prominent locations. The new trees should have the potential to reach a significant height without excessive inconvenience and be sustainable in the long term.

Subject to the implementation of the above mitigation measures, Naturally Trees consider the proposal to have a positive impact on local amenity and character of the area.

8.6.2. Tree Canopy Coverage

As discussed above, a comprehensive landscaping and tree replacement scheme has been developed by Site Image and include at **Appendix J.** The proposed landscaping seeks to improve the amenity of the Site, provide visual relief, enhance the streetscape canopy, and mitigate potential heat island effects.

Careful consideration has been given to the Greater Sydney District Plan's canopy cover target of 25% for general industrial sites and how the Site can accommodate this target. Given the nature of the Site and proposed warehouse use which requires a large building footprint, it has been difficult to achieve the 25% canopy target. Whilst the proposal does not achieve the 25% requirement, a considerable effort has been made to provide and enable strong canopy links. The proposed landscaping scheme has focused on enhancing the canopy coverage along Edinburgh Road and Sydney Steel Road by planting trees in accordance with the M*arrickville Street Tree Master Plan 2014.*

Where possible, opportunities to provide multi-layered tree canopies within the Site have been maximised. These trees will establish and complement the street frontages and street tree canopy. The use of both the Spotted and Lemon Scented Gum, which at maturity reach approximately 20m tall x 8m wide, provide a strong canopy presence along the street frontage and help soften the built form. The proposed street tree detail below demonstrates the intent to have large planted out tree pits approximately 1.4m x 3m, allowing the trees to establish and be supported by the adjacent soil volumes.

It is also proposed to install 400L street trees to create a strong presence of trees for both people using the public domain footpath and vehicles and pedestrians passing by.

As per the SEARs submission from Inner West Council, the proposal has been assessed against the objectives and controls in Section 2.20 of MDCP 2011, Inner West Council Tree Management (see Section 6.14 for DCP provisions).

Figure 28 Proposed Tree Canopy Coverage

Source: Site Image

8.7. ECOLOGICALLY SUSTAINABLE DEVELOPMENT

Assessment

An Ecological Sustainable Development (**ESD**) Strategy has been prepared by WSP and included at **Appendix L.** As per the SEARs, the ESD Strategy identifies how the principles of ESD will be incorporated into the design, construction and ongoing operation of the warehouse and the associated office space. Consideration has been given to the use of green walls, green roofs and/or cool roofs in the design of the development and measures to minimise consumption of resources, especially energy and water.

The following measures are proposed to ensure a holistic sustainable strategy for the development:

- Implement energy efficiency measures to reduce greenhouse gas emissions;
- Install highly efficient water fittings and fixtures supplemented with rainwater harvesting;
- Procurement of materials that have low environmental impacts;
- Enhance site ecology through high quality landscape design; and
- Design that mitigates or adapts to climate change impacts.

The following section describes the proposed sustainability strategy:

Energy and Greenhouse Gas Emissions

- The following initiatives are proposed to ensure the development reduces its carbon emissions:
- For the conditioned areas, high performance façade: optimisation of window to wall ratio on NCC2019 compliance;

- High efficiency Heating, Ventilating, and Air Conditioning (HVAC);
- High efficiency LED lighting (particularly relevant to the warehouse as lighting will be the main energy consumer);
- Roof mounted photovoltaic systems to offset grid energy and minimise peak energy demands;
- Incorporation of commissioning, maintenance and building tuning into the project programme; and,
- Incorporation of ongoing monitoring trends from energy metering.

Water

To achieve water efficiency there will be a heavy emphasis on the efficiency of the water fixtures and fittings. The following WELs ratings are recommended:

Table 15 Recommended water fixture and fittings efficiencies

Fixture	**WELS ratings and flow/flush rate**
Toilets	4 Star - 3/4.5L dual flush
Urinals	6 Star - 0.8 L/flush
Kitchen and bathroom taps	6 Star - 4.5L/min
Showers	4 Star - no more than 7.5L/min
Dishwasher	5 star

Material Selection

The following initiatives are proposed:

- Encourage the re-use of products and materials, including from the existing site where practical.
- Use building materials, fittings and finishes 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.

Indoor Environment Quality

The following initiatives are proposed:

- Localised lighting control;
- Flicker free lighting that accurately addresses the perception of colour;
- Optimized building layout to ensure greater access to daylight and high-quality external views;
- Glare reduction from the installation of blinds or shading devices that can be controlled by the occupant;
- Provide high rates of outdoor air to reduce the level of indoor pollutants;
- Consider the use of natural or mixed mode natural ventilation where appropriate.

Biodiversity

The following landscape design elements are proposed:

- Use of native vegetation as opposed to exotic species in terraces and other applicable areas, which encourage native wildlife and have lower water requirements; and,
- The implementation of vegetation to reduce the causes and impacts of the urban heat island effect, including efforts to retain tree canopy where possible and landscaped roof area for the office.

Transport

The proposal seeks to promote alternative means of transport to minimise green house gas emissions, reduce traffic congestion, improve air quality and encourage active transport as a means of mobility. The location of the development is suitable for alternative forms of transport due to its proximity to a range of public transport services such as bus routes and rail.

The following initiatives will be investigated in more detail as the design develops:

- Electric vehicle charging stations for the office car park, charging facilities for outbound trucks.
- Anticipated organisational transition to an EV / PHEV fleet.
- The building will provide active transport facilities such as bicycle storage, showers and lockers

Green Roofs, Green Walls and Cool Roofs

Consideration has been given to the provision of a green wall or green roof to provide thermal and noise insulation benefits, promote local biodiversity, mitigate heat island impacts and provide additional aesthetics to a development. Given the higher capital cost in construction, the recurring resource demand for maintenance and the fact that green roofs are also heavier than a traditional roof, for this initiative to be implemented, structural consideration is required early in the design process to account for the additional weight. Green roofs are best suited to a flat roof design, and for this project with extensive pitched roof area, suitability will be reviewed further at the detailed design stage.

Notwithstanding this, cool roofs incorporate roofing materials which are capable of reflecting more solar energy than absorbing it. Rooftop installed PV panels can contribute to a cool roof design, by providing additional shading whilst offsetting building energy demand. The project will explore the potential incorporation of cool roof and how this will impact its surrounding environment at the detailed design stage.

Mitigation Measures

- **Façade Configuration -** Performance analysis to seek optimal window to wall ratio, glazing system selection and potential shading devices.
- **Solar Photovoltaic On Site Renewables** - Coordination with design team to ensure sufficient spatial allocation of appropriate PV capacity.
- **Energy metering** - Specify the exact requirement for metering and monitoring in design documents.
- **Water consumption** – Water balance and feasibility analysis to determine optimal rainwater capture capacity and ensuring appropriate spatial allocation.
- **Water metering** - Specify the exact requirement for metering and monitoring in design documents.
- **Material selection** - Undertake a site survey of the existing development to identify if hazardous materials are present and should be disposed appropriately. Specify the requirements for material and product procurement in design documents.
- **Indoor environment** - Analyse the different area functions within the development and determine the most appropriate IEQ initiatives to be implemented.
- **Biodiversity** - Coordinate with the project team to determine how the project can maximise its ecological potential.
- **Transport** - Understand the immediate and future need for electric vehicle infrastructure and active transport facilities and design appropriately.
- **Green roofs, walls and cool roofs -** Feasibility study of the implementation of green roofs, green walls and/or cool roofs at the detailed design stage.
- **Climate change** - Identify potential climate change hazards early in design and incorporate design responses in the design.

Conclusion

The ESD Report included at **Appendix L** sets out how the proposed development has considered sustainable design strategies from the outset of the project. This has been achieved through the holistic approach to sustainable design, with a strong focus on energy efficiency, low carbon design strategies and reduced water consumption.

The proposed design targets have high ESD standards in accordance with the SEAR requirements. Further analysis will be undertaken at the detailed design stage to ensure the appropriateness of these strategies to the development.

8.8. SOLAR REFLECTIVITY

Windtech have prepared a Solar Light Reflectivity Report (**Appendix GG**) to assess the potential for hazardous glare from the façade of the proposed development affecting motorists, train drivers, pilots, pedestrians, and occupants of neighbouring buildings. A summary of the methodology, assessment and recommended mitigation measures are provided below.

Assessment

The reflectivity analysis was carried out using the technique published by Hassell (1991). The limiting veiling luminance of 500 cd/m² for the comfort of motorists has been adopted as a basis of assessing the glare impact from the development.

Specific locations that may be potentially affected by solar reflections have been identified. These locations also known as 'check zones' do not consider the effect of overshadowing by neighbouring buildings or the shielding effect of any existing trees or other obstructions.

Figure 29 Check zones and study point locations

Source: Windtech

Table 16 Aspects of the development that could reflect solar glare to each study point

Location	Analysis	Impact
01 Sydney Steel Road, heading north-east	This point is a critical sightline of motorists heading north-east along Sydney Steel Road. The development will not be visible at this location. There will be no adverse solar glare observed by motorists heading north-east along Sydney Steel Road.	Nil
02 Edinburgh Road, heading north-west	This point is a critical sightline of motorists heading north-west along Edinburgh Road. The portion of the development visible within the zone of sensitive vision is not a glazed surface. Hence there will be no adverse solar glare observed by motorists heading north-west along Edinburgh Road.	Nil
03 Edinburgh Road, heading south-east	This point is a critical sightline of motorists heading south-east along Edinburgh Road. A portion of the development will be visible from motorists. Solar glare can potentially be observed at Point 3 however further analysis indicates this aspect of the development will be overshadowed by the proposed sunshade fins on the façade of the development at times when glare could have otherwise be observed (i.e. early summer mornings). No adverse glare will be observed by motorists.	Low
04 Smith Street, heading south-east	This point is a critical sightline of motorists heading south-east along Smith Street. The portion of the development visible is not a glazed surface. Hence there will be no adverse solar glare observed by motorists heading south-east along Smith Street.	Nil
05 Bourne Street, heading south	This point is a critical sightline of motorists heading south along Bourne Street. The portion of the development visible is part of the warehouse and is not glazed. The portion of the north-eastern aspect is part of the Spec Office 1 and is glazed. This portion will be overshadowed by the warehouse component of the development at times where glare could have otherwise been observed (early autumn and summer mornings). No adverse glare will be observed by motorists heading south along Bourne Street from the development.	Nil
06 Juliett Street, heading south-west	This point is a critical sightline of motorists heading south-west along Juliett Street. The development will not be visible at this location. There will be no adverse solar glare observed by motorists.	Nil
07 Shelleys Lane, heading south-west	This point is a critical sightline of motorists heading south-west along Shelleys Lane. The development will not be visible at this location. There will be no adverse solar glare observed by motorists.	Nil
08 Victoria Road, heading south-west	This point is a critical sightline of motorists heading south-west along Victoria Road. The development will not be visible at this	Nil

Location	Analysis	Impact
	location. There will be no adverse solar glare observed by motorists.	
09 Silver Street, heading north-west	This point is a critical sightline of motorists heading north-west along Silver Street. The development will not be visible at this location. There will be no adverse solar glare observed by motorists.	Nil
10 Edith Street, heading north-west	This point is a critical sightline of motorists heading south-east along Edith Street. Portions of the development visible from motorists are not glazed surfaces. Hence there will be no adverse solar glare observed by motorists heading north-west along Edith Street.	Nil
11 Metro Rooftop Carpark, heading south	Points 11 and 12 are located along the Marrickville Metro rooftop carpark to the north of the Site. Point 11 is located within the check zones and hence solar glare can potentially be observed from portions of the north-eastern aspects and north-western aspects. Analysis indicates glazed portions of the north-western aspect will be overshadowed by the warehouse component of the development at the times when glare could be observed. The level 7 balustrade will also have an angular width of less than 0.5 deg arc when viewed from Point 11 and therefore the intensity of glare observed will be less than 500 cd/m², providing that the maximum normal specular reflectance of visible light of the glazing is 20%. To ensure no adverse glare is observed at Point 11, it is recommended to limit the normal specular reflectance of visible light of the glazing used on the north-eastern aspect of the main office building to a maximum value of 14% for Levels 5 and 6.	Low
12 Metro Rooftop Carpark, heading south	Portions of the north-eastern aspects of the development will be visible and within the zone of sensitivity. Solar glare can potentially be observed from portions of the north-eastern aspects and north-western aspects. The level 7 balustrade will also have an angular width of less than 0.5 deg arc when viewed from Point 11 and therefore the intensity of glare observed will be less than 500 cd/m², providing that the maximum normal specular reflectance of visible light of the glazing is 20%. To ensure no adverse glare, it is recommended to limit the normal specular reflectance of visible light of the glazing used on the 036º to a maximum value of 15% for Levels 5 and 6.	Low
13 Metro Rooftop Carpark, heading south-west	This point is a critical sightline of motorists heading south-west along the Metro rooftop carpark. Portions of the north-eastern and south-eastern aspects of the development will be visible within the zone of sensitive vision of motorists. Point 13 is not located in the	Low

Location	Analysis	Impact
	check zone for the south-eastern aspect. The intensity of glare observed from the glazing on the north-eastern aspect will be less than 500 cd/m² and therefore there will be no adverse solar glare for motorists heading south-west.	

Mitigation Measures

To avoid any adverse glare to motorists, train drivers, pilots, pedestrians and occupants of neighbouring buildings, the following limitations to the maximum normal specular reflectance of visible light of the external façade materials is recommended:

- Glazing for the north-eastern aspect of the main office building on Level 5 and 6 should have a maximum normal specular reflectance of visible light of 14%.
- All other glazing used on the external façade of the development should have a maximum normal specular reflectance of visible light of 20%.
- The roof should have a maximum normal specular reflectance of visible light of 20%.

Conclusion

Subject to the incorporation of the above mitigation measures, Windtech conclude the proposed development will not cause adverse solar glare to motorists, train drivers, pilots, pedestrians and occupants of adjoining buildings.

8.9. AIR QUALITY AND ODOUR

An Air Quality and Odour Assessment has been prepared by Northstar Air Quality and included at **Appendix BB.** The assessment considers the air quality and odour risks associated with the construction and operation of the proposed development. Specifically, the assessment contains:

- A description of all potential sources of odour and emissions during the construction and operational phases of the development;
- A qualitative assessment of potential air quality impacts at surrounding receivers during construction and operation of the development, in accordance with the relevant Environment Protection Authority guidelines; and
- Details of any mitigation, management and monitoring measures required to prevent and/ or minimise emissions.

Assessment

The following potential sources of odour and emissions during construction and operation have been identified.

Construction phase

- The construction phase will involve the demolition of the existing buildings and structures on-site, site clearance, establishment of new and/or realigned site services (including telecommunication, water, electricity and/or gas supplies) and the construction of the warehouse and office building.
- Emissions to the atmosphere associated with the above construction activities relate to construction dust (particulates) which, if not adequately controlled, may be experienced in the surrounding areas as an amenity impact (such as visible dust plumes, dust soiling and dirt track-out onto surrounding roads) and as health impacts.
- Construction phase dust emissions tend to be larger size particulates, typically in the range of 30 microns (µm) to 10 µm, and particles of this size are typically experienced as amenity impacts rather than health impacts.

Operational phase:

- The operational phase will involve the delivery of goods by semi-trailer, export of goods by medium rigid vehicles, vehicle traffic to and from the offices and other uses, and the preparation of foodstuffs in the CFC.
- The following activities are anticipated to result in potential emissions to air:
  - **Road traffic emissions** - Road traffic exhaust emissions from the movement of vehicles in and out of the Site on paved road surfaces;
  - **Road traffic idling emissions** - Road traffic exhaust emissions from vehicles idling at delivery and loading bays;
  - **Commercial kitchen (chicken rotisserie and bakery)** - the proposal includes the operation of commercial kitchen activities including a chicken rotisserie and the operation of a bakery to manufacture small goods.

    Emissions from a commercial kitchen will vary rapidly and significantly in composition depending on the cooking processes being used. From an environmental perspective, emissions to atmosphere from kitchen exhaust ventilation systems are typically associated with odour and particulates (i.e. smoke).

    Cooking processes may also give rise to emissions of a range of air pollutants associated with the combustion of fuel including NO_X, CO, CO_2 and a range of organics including VOCs, semi-volatile organic compounds and aldehydes.

Construction and Operational Traffic

With regard to emissions from road traffic, the assessment has considered the potential impact of emissions associated with the construction and operational phases. Where changes to construction and/or operational traffic is **significant** a quantitative assessment is typically performed.

Road traffic exhaust emissions may include a range of air pollutants, including particulate matter and oxides of nitrogen, including nitrogen dioxide. There would additionally be some less significant emissions of carbon monoxide, sulphur dioxide and volatile organic compounds.

The Traffic and Access Report (**Appendix H**) states that it is anticipated that between 50 − 100 vehicles may be required during peak hours during the construction period. In relation to pollutant emissions associated with construction vehicle traffic, reference is made to the guidance used to assess construction phase impacts (IAQM, 2014) which states:

> *"Experience of assessing the exhaust emissions from on-site plant (also known as non-road mobile machinery or NRMM) and site traffic suggests that they are unlikely to make a significant impact on local air quality, and in the vast majority of cases they will not need to be quantitatively assessed. For site plant and on-site traffic, consideration should be given to the number of plant/vehicles and their operating hours and locations to assess whether a significant effect is likely to occur.*
>
> *For site traffic on the public highway, if it cannot be scoped out (for example by using the EPUK's criteria), then it should be assessed using the same methodology and significance criteria as operational traffic impacts. The impacts of exhaust emissions from on-site plant and site traffic are not considered further in this Guidance."*

As per above, exhaust emissions from on-site plant and site traffic suggests that they are unlikely to make a significant impact on local air quality, and in the vast majority of cases, will not need to be **quantitatively** assessed. As per the Traffic and Parking assessment, the construction traffic impacts are not considered significant and therefore are not considered to warrant a **quantitative** assessment. Notwithstanding this, a **qualitative** level of assessment has been performed.

With regard to operational traffic, peak AM and PM traffic flows during operation of the proposed development are address in the Transport, Traffic and Parking Assessment at **Appendix H**. The traffic flows are noted to be over twice the flows anticipated during the construction phase. Conversion of the reported peak hourly values to annual average daily traffic flows has been performed based on measured (2020) traffic flows on Enmore Road, Newtown (RMS traffic counter 02062, the closest measurement point to the site) which indicates a relationship between peak AM traffic flows and annual average daily traffic flows

(AADT) of 4.1. Correspondingly, the calculated AADT flows on surrounding roads during operation, including the addition of the flows associated with the proposed development, are all anticipated to be <7 100 vehicles.

To evaluate the significance of the predicted changes in operational traffic flows, reference has been made to the Environmental Protection UK (EPUK) document "*Development Control: Planning for Air Quality (2010 Update)*" (EPUK, 2010) which has been referenced in lieu of any identified NSW or Australian guidance. The guidance provides threshold criteria for evaluating the significance of changes in traffic, as a traffic flow change of more than 5 % to 10 % on roads with AADT of >10 000 vehicles required to be assessed through quantitative methods (i.e. dispersion modelling).

The criteria outlined in EPUK (2010) provides a screening (i.e. **qualitative**) level of assessment which considers the potential for adverse air quality impacts based on traffic flows. As reported in the Traffic Report the anticipated changes in traffic do not exceed that threshold, and it is not considered likely that the impacts associated with the Proposal would lead to adverse impacts during the operational phase. In accordance with the adopted guidance a **quantitative** assessment is not required and the **qualitative** assessment screens that potential risk.

To minimise impacts of traffic during construction, construction traffic will be managed through the implementation of a detailed Construction Environment Management Plan, including the Construction Traffic Management Plan.

Mitigation Measures

To manage risks associated with the above odour and air emissions, Northstar Air Quality have identified mitigation measures to be implemented in the draft Construction Environmental Management Plan (**CEMP**). A detailed review of the recommendations would be performed once details of the construction phase are available.

The mitigation measures have been classified into the following categories:

- **N** = not required (although they may be implemented voluntarily).
- **D** = desirable (to be considered as part of the CEMP but may be discounted if justification is provided).
- **H** = highly recommended (to be implemented as part of the CEMP and should only be discounted if site-specific conditions render the requirement invalid or otherwise undesirable).

The following section summarises the mitigation measures that are highly recommended. Further detail is provided in Table 16 of **Appendix BB.**

Construction Mitigation Measures

- Communications - Develop and implement a stakeholder communications plan that includes community engagement before work commences on Site.
- Site Management - Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken.
- Monitoring - Undertake daily on-site and off-site inspections where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log available to the local authority when asked. This should include regular dust soiling checks of surfaces such as street furniture, cars and windowsills within 100m of the site boundary.
- Preparing and Maintaining the Site - Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible. Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site.
- Operating Vehicle/Machinery and Sustainable Travel - Ensure all on-road vehicles comply with relevant vehicle emission standards, where applicable. Ensure all vehicles switch off engines when stationary - no idling vehicles. Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials. Implement a Travel Plan that supports and encourages sustainable travel.
- Operations - Only use cutting, grinding, or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction. Ensure equipment is readily available on site to clean any dry spillages and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.

- Waste Management - avoid bonfires and burning of waste materials.
- Demolition - Soft strip inside buildings before demolition (retaining walls and windows in the rest of the building where possible, to provide a screen against dust). Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable.
- Construction - 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 Traffic - Ensure all on-road vehicles comply with relevant vehicle emission standards, where applicable. Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery.

Subject to the implementation of the recommended mitigation measures, for almost all construction activity, the adapted methodology notes that the aim should be to prevent significant effects on receptors through the use of effective mitigation measures. Given the size of the Site, the distance to sensitive receptors and the nature of the activities to be performed, residual impacts associated with fugitive dust emissions from the proposed development would be anticipated to be 'negligible' for all activities.

Operational Mitigation Measures

Based upon the assumptions presented in the risk assessment, both commercial kitchen operations assessed require additional mitigation.

- Provision of grease arrestors at the points of extraction from the chicken rotisserie within the ductwork in the kitchen. This is required to minimise the risk of grease dropping out, and condensing from, the airflow and causing subsequent odour (and fire risk) issues in the extraction system.
- Filtration (e.g. cartridge filtration) to remove particulates (smoke) and reduce odorants in aerosols from both processes.
- Odour treatment (e.g. ozone injection, ultra-violet treatment, carbon adsorption) to neutralise gaseous odour from both processes.
- Vertical discharge to atmosphere at a minimum velocity as prescribed in *AS 1668.2-2012 The Use of Ventilation and Airconditioning in Buildings - Mechanical Ventilation in Buildings* from both processes. Both processes will require independent discharge points
- Vertical discharge to atmosphere at emission heights and locations as prescribed in AS 1668.2.
- Operation of the above systems in accordance with the manufacturer's instructions.
- Maintenance of a stock of spare components to minimise the risk of odour nuisance as a result of equipment failure / breakthrough for all systems.

Subject to the implementation of the above mitigation measures, the magnitude of impacts would be reduced to 'slight', which corresponds to "potential impact may be tolerated", and "potential slight magnitude of impacts is not likely to generate nuisance complaints".

Conclusion

As discussed above, construction activities may generate air and odour impacts associated with demolition, earthworks, construction and associated vehicle traffic. The assessment showed there to be a high risk of dust soiling impacts during all construction activity and a high risk of health or nuisance impacts during demolition works. Health impacts for all other construction works were showed to exhibit a **medium risk**.

A range of mitigation measures are recommended to ensure that short-term impacts associated with construction activities are minimised. Furthermore, the assessment has assumed the worst-case scenario whereby construction activities across the entire Site are performed at one time, whereas construction activities may be staged.

The potential impacts associated with operational activities including a chicken rotisserie and bakery have been assessed using a risk-assessment approach adopted from ISO 31000:2018 and IEC 31010:2019.

Road traffic emissions and road traffic idling emissions were not included in the risk assessment as the Traffic and Access Assessment Report included at **Appendix H** reported that emissions generated from these activities are expected to be lower than the previously approved development (DA 2015/00168) traffic flows, and the impacts / risks of the proposed development would provide a more favourable outcome than that already approved.

The risk assessment found there to be a **high risk** of potential odour emissions generated from the chicken rotisserie and bakery operations. The required mitigation methods have been determined, including recommendations for air pollution control to manage emissions of smoke and odour, and recommendations for the design of the emission points in compliance with AS 1668.2.

Based upon the assumptions presented in the report and the implementation of the recommended mitigation methods, the Site is assessed as being capable to not give rise to significant air quality and odour impacts during the construction and operational phases of the development.

8.10. NOISE AND VIBRATION

An Acoustic Report has been prepared by Acoustic Logic and included at **Appendix Z.** A Preliminary Construction Noise and Vibration Management Plan has also been prepared by Acoustic Logic and included at **Appendix HH.**

In accordance with the SEARs, the report contains the following:

- A description of all potential noise and vibration sources during the construction and operational phases of the development, including on and off-site traffic noise;
- A cumulative noise impact assessment of all potential noise sources in accordance with relevant Environment Protection Authority guidelines;
- An assessment of potential aircraft noise impacts, including a consideration of the site within the 25-30 ANEF contour; and,
- Details of noise mitigation, management and monitoring measures.

A cumulative noise impact assessment of all potential noise sources in accordance with the relevant EPA guidelines has been undertaken. The assessment has considered noise emissions from mechanical plant to service the site.

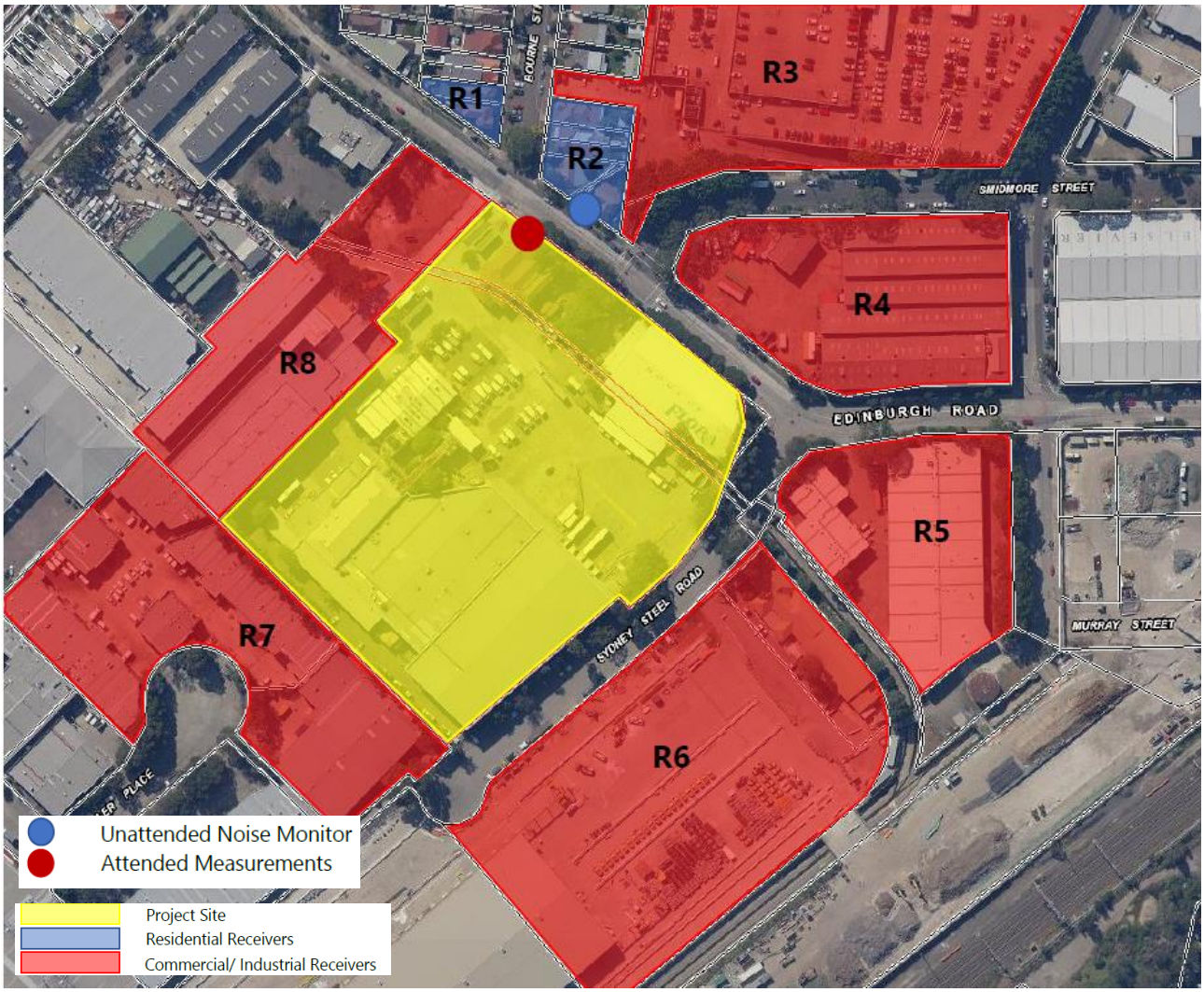
8.10.1. Operational Noise

Assessment

The Acoustic Report considers noise impacts associated with:

- Noise intrusion to the Site from adjacent roadways and aircraft; and
- Noise emissions from the Site to surrounding residential and industrial receivers (i.e. mechanical plant) to nearby sensitive receivers.
- The nearest sensitive noise receivers are identified in Figure 30.

Figure 30 Nearby Sensitive Noise Receivers



Source: Acoustic Logic

Unattended noise monitoring was conducted from Wednesday 10th June 2020 to Monday 22nd June 2020. Attended noise measurements were undertaken between the hours of 11.00am and 12.00pm on 22nd June 2020.

Noise Intrusions to the Site

Sydney Airport

The Site is located between the ANEF 30 and 35 contours. In accordance with AS 2021:2015, a full evaluation of internal noise levels is to be carried out and requires an examination of the likely levels of internal noise from aircraft flyovers.

Based on the distance of the Site to the runways, the flightpath and site elevation, AS 2021 predicts that the loudest typical aircraft movement will be from an A330 aircraft departing on the main runway. The noise level at the Site is 84dB(A). This noise level has been used to predict the resultant internal noise levels.

Traffic Noise

The following section establishes surrounding environmental noise levels impacting the proposed development. The following traffic noise levels have been established based on short term attended measurements and long term noise monitoring:

Table 17 Measured Traffic Noise Levels

Location	Time of Day	Noise Level – Leq
74 Edinburgh Road	Daytime 7am – 10pm	68 dB (A) Leq (15hr)
	Night Time 10pm – 7am	61 dB (A) Leq (9hr)

Mitigation Measures – Noise into the Site

An assessment of façade requirements has been undertaken to achieve required indoor noise levels. The following recommendations are made

Glazed Windows and Doors

Aluminium framed/sliding glass doors and windows will be satisfactory provided they meet the following criteria. All external windows and doors are to be fitted with Q-Ion type acoustic seals. Thicker glazing may be required for structural and safety purposes. The recommended constructions are detailed below:

Table 18 Recommended Glazing Construction

Room	Glazing Thickness	Acoustic Seals
Open Office Spaces	6.38mm Laminated	Yes
Private Office / Conference Rooms <15sqm external glazed area	12.38mm Laminated	Yes
Private Office / Conference Rooms >15sqm external glazed area	10.38mm Laminated / 100mm airgap / 4mm Float	Yes

In addition to complying with the minimum scheduled glazing thickness, the Rw rating of the glazing should not be lower than the values listed below.

Table 19 Minimum Rw of Glazing Assembly (with Acoustic Seals)

Glazing Assembly	Minimum Rw of Installed Window
6.38mm Laminated	31
10.38mm Laminated	35
12.38mm Laminated	37

External Roof / Ceiling Construction

The external roof will be constructed from concrete elements and therefore acoustic upgrading is not required. In the event penetrations are required through the external skin, an acoustic sealant should be used. For warehouse areas, a minimum construction of 0.5mm metal deck is required.

External Wall Construction

For walls of concrete/masonry construction, acoustic upgrading is not required however there should be vents on the internal skin of all external walls. In the event penetrations are required through the external skin, an acoustic sealant should be used. For external walls constructed from lightweight materials, the minimum construction is outlined below.

Table 20 External Light Weight Wall Construction

Area	**Material**
General Office Areas	9mm fibre cement, 90mm stud with 75mm thick 11kg/m3 glasswool insulation, 1 x 10mm plasterboard
Private Offices	9mm fibre cement, 90mm stud with 75mm thick 11kg/m3 glasswool insulation, 2 x 16mm plasterboard
Industrial / Warehouse	0.5mm Metal Deck

Noise Emissions from the Site

The following section provides an assessment of noise emissions from the Site.

Noise from Mechanical Plant

Detailed plant selection and location has not yet been finalised. Satisfactory noise levels will be achievable through appropriate plant selection, location and if necessary, standard acoustic treatments such as duct lining, acoustic silencers and plant enclosures.

Notwithstanding this, an indicative assessment of the initial design of primary plant items has been undertaken including generators, refrigeration equipment, fans and air-cooled chillers. Compliance with EPA acoustic criteria will be achievable provided that a detailed review of acoustic plant items is undertaken once plant is selected and acoustic treatments similar to those provided in Section 7.1.1 of the report are adopted. These include:

- Generators may be used for standby power however they may require attenuation to radiators and air intakes as well as silencers/mufflers to the exhaust.
- Refrigeration compressors are recommended to be located within enclosure plant rooms.
- Refrigeration condensors are recommended to be located as far as possible from adjacent noise sensitive development.
- Major fans may require acoustic treatment if located externally near sensitive receivers.
- The indicative location of air cooled chillers will be above the office building. Conservative calculation with a sound power of up to 90 dB(A) shows compliance with noise emission levels subject to the installation of an acoustic barrier facing residential receivers to break line of sight.

A cumulative assessment of both plant noise with other noise sources is recommended when conducting acoustic design of plant items. Acoustic Logic have confirmed that compliance with EPA acoustic criteria will be achievable provided a detailed review of plant items is undertaken once items are selected. A detailed acoustic review will be undertaken at CC stage to determine appropriate acoustic treatments to manage noise levels.

Carpark Noise

An assessment of carpark noise emissions has been undertaken based on the anticipated traffic trip generation information provided in the Traffic and Parking Assessment prepared by CBRK (**Appendix H**).

The Traffic Report estimates a maximum of approximately 250 vehicle movements during the AM and PM peak period. The worst affected residential receiver has been identified as R2. Noise associated with car

manoeuvring, car door slamming and cars starting has been considered. The results indicate that all predicted noise levels to Residential Receiver R2 comply with the noise criteria.

Loading Dock and Waste Collection

The primary noise associated with the loading dock is trucks entering and exiting the dock. Noise emissions have been based on the following assumptions:

- A typical truck sound power level of 100dB (A) Leq; and
- There are no more than eight truck movements in any 15-minute period.
- The worst affected receivers are R7 (Industrial) and R2 (Residential). The predicted noise levels to all sensitive receivers comply with the requirements of the NSW EPA Noise Policy for Industry during the day and evening period.

Cumulative predicted noise emissions

Cumulative noise emissions to the most sensitive receivers around the development has been assessed. A detailed acoustic review should be undertaken at Construction Certificate stage to determine mechanical acoustic treatments to control noise emissions to satisfactory levels. The worst affected receivers are R2 and R7.

Notwithstanding this, predicted cumulative noise emissions to the most sensitive receivers are compliant with the EPA Noise Policy for Industry. Noise as a result of additional traffic generation is also compliant with the EPA Road Noise Policy.

Conclusion

Subject to complying with the mitigation measures identified in Section 5.3 of the Acoustic Report and discussed above, internal noise levels for the development will comply with the acoustic requirements of:

- Inner West Council DCP and LEP 2011;
- Australian Standard AS 2021:2015 – *Acoustics-Aircraft Noise Intrusion – Building Siting and Construction;* and,
- Australian Standard AS 2107:2016 – *Recommended Design Sound Levels and Reverberation Times for Building Interiors.*
- External noise emissions have been established to satisfy the requirements of:
- NSW EPA Noise Guide for Local Government 2013;
- Inner West Council DCP and LEP 2011;
- NSW Department of Environment, Climate Change and Water, Environmental Protection Agency Document – Road Noise Policy 2011; and,
- NSW Department of Environment and Heritage, Environmental Protection Agency Document – Noise Policy for Industry (NPI) 2017.

The proposed use is suitably located amongst other general industrial land uses. Whilst it is intended to operate 24 hours per day, there should be no afterhours disturbance to surrounding properties given the low key nature of the business and the relative isolation of the Site from residential properties to the north of Edinburgh Road.

8.10.2. Construction Noise and Vibration

A Preliminary Construction Noise and Vibration Management Plan (**CNVMP**) has been prepared by Acoustic Logic and included at **Appendix HH.** The CNVMP identifies potential noise and vibration impacts associated with the demolition, excavation, and construction stages of the project. Specifically, the assessment contains the following:

- Identifies applicable noise and vibration standards;
- Identifies nearby sensitive noise receivers;

- Identifies likely key sources of noise and vibration and predicted noise levels at nearby receivers;
- Recommends mitigation measures in the event compliance with noise standards is not achieved.

Noise impacts identified within the report have been addressed in accordance with the relevant legislation and guidelines, including the *Interim Construction Noise Guideline (DECC, 2009),* AS 2436-2010 *Guide to Noise and Vibration Control on Construction, Demolition and Maintenance Sites* and *Assessing Vibration: A Technical Guide (DEC, 2006).*

Assessment

- The following construction hours are proposed:
- Monday to Friday 7am – 6pm;
- Saturday – 7am – 4pm.

Construction works during the above hours have been assessed with reference to the standard hours noise management levels (background + 10 dB (A)) and outside standard hours noise management levels (background + 5 dB(A) in the NSW EPA Interim Construction Noise Guideline.

The nearest sensitive noise receivers are identified in Figure 30.

Construction Noise

The predicted noise levels during excavation and construction will depend on the activity undertaken and the distance between the Site and the receiver. The distance between the noise source and the receiver will vary accordingly the predicted noise levels have been presented as a range.

The use of concrete crushers, hydraulic drills and bored piling are predicted to be the highest noise generating equipment. All noise predictions have been presented as external noise levels. Internal noise levels at all locations are expected to be 10-20dB(A) lower dependent on the façade of each receiver. Concrete crushers and hydraulic drills are only expected to be used during the demolition and excavation stage, with piling only expected during the excavation stage.

Receivers R7 and R8 share a boundary with the Site and therefore are exposed to higher levels of construction noise. These receivers comprise industrial/commercial land uses and specific mitigation measures are identified below.

Construction Vibration

Excavation, piling, concrete crushing and vibratory rolling are anticipated to generate the most amount of vibration. The primary potential vibration source will be from the use of bored piling and vibratory rolling. The vibration impact on all receivers is expected to comply with *German Standard DIN 4150-3 Structural Vibration: Effects of Vibration on Structures* and the Department of Environment and Conservation NSW *Assessing Vibration: A Technical Guideline.*

Mitigation Measures

The following mitigation measures are recommended:

- **Community Consultation and Notification** – Recommend notifying all residents within 100m of the development prior to the commencement of works. It should advise of anticipated date and duration of excavation.
- **Respite Periods** – Respite periods should be introduced where construction activities exceed highly noise affected levels (75dB(A)). The following respite hours are recommended:
  - Monday to Friday: 7am – 8am
  - Saturday: 8am – 9am
  - Monday to Saturday: 12pm – 1pm
  - Construction plant predicted to exceed the highly noise affected level would only be used intermittently during the demolition and excavation stage. It is recommended to limit demolition and excavation works to Monday to Friday only.

- **Vibration Monitoring** – in the event of a complaint, vibration monitoring is recommended along the site boundary closest to the receiver who issued the complaint.
- **Quiet Work Methods** – The primary noise generating activity is expected to be the bulk excavation period. Use of quieter excavation methods should be adopted.
  - Use of the loudest excavation equipment should only be used when other options are not available.
  - It is recommended to use rock saws near all boundaries to reduce noise and vibration.
  - Subject to OH&S requirements, trucks and bobcats are to use a non-tonal reversing beacon to minimise disturbance.
  - Avoid careless dropping of construction materials into empty trucks.
  - Trucks and trailers should turn off their engines during idling.
- **Complaints Handling –** in the event of a compliant, the above measures should be implemented.
- **Site Induction** – A Noise Management Plan should be prepared and made available to all contractors. The location of the NMP should be advised in any site induction. Site induction should also detail the site contact in the event of a complaint.

Section 11 of the CNVMP included at **Appendix HH** identifies noise mitigation strategies in the event of a complaint. Measures include selection of alternate appliances or processes, acoustic barriers, material handling, treatment of specific equipment and establishment of site practices.

8.11. FLOODING AND STORMWATER

8.11.1. Stormwater

A Stormwater Management Plan has been prepared by Richmond + Ross and included at **Appendix AA** with consideration of MDCP 2011.

Assessment

The Site currently drains via an underground network of stormwater pit and pipes to existing council stormwater network on Sydney Steel Road. There is no indication of an existing On-site detention (**OSD**) tank. It is proposed to construct a new stormwater network to convey stormwater from the site. Specifically, the following is proposed:

- A new network of pipes and pits is proposed to convey the runoff from the Site to a stormwater treatment train prior to exiting the Site at the legal point of discharge.
- The building roof area will drain to 2x 80kL onsite rainwater tanks. The collected water will be used for toilet flushing within the Site. Analysis from MUSIC indicates a minimum of 80% of non-potable water demand of the Site is achieved by this arrangement.
- A system consisting of ocean guard pit inserts and filter cartridges is proposed to treat the stormwater runoff generated by the development prior to discharge into Sydney Water owned culvert on Sydney Steel Road. The proposed treatment train achieves the pollutant removal targets as required by Part 2.17 of the MDCP 2011.
- Consultation with Sydney Water has revealed an OSD requirement applies to the Site. Therefore, underground OSD tanks are proposed to control the peak stormwater discharge rate generated by the development.
- Humeceptors are proposed to treat stormwater prior to it leaving the Site.

Consultation with Sydney Water has revealed that based on a site area of approximately 28,000m^2, 427m^3 of OSD storage is required with a permissible site discharge (PSD) rate of 985l/s. Due to site constraints form the existing Sydney water culvert passing through the Site, it is not feasible to have a single site discharge. It is therefore proposed to separate the area of the Site into two separate catchments, north of culvert and south of culvert.

Key components of the Stormwater Management Strategy are outlined below:

- **Rainwater Tanks** - Rainwater tanks are proposed to allow for reuse of collected rainwater from roof areas for toilet flushing.
- **Gross Pollutant Traps** - A Humeceptor has been proposed for each of the catchments to treat runoff prior to entering the filter cartridge chamber. For the purposes of modelling, it is assumed that the whole Site is impervious as a worst-case scenario condition. The humeceptor will also aid in the removal of hydrocarbon from runoff in vehicle trafficked areas.
- **Filter Cartridges** - The StormFilter, used on Site, is a stormwater treatment system using rechargeable, self-cleaning, media-filled cartridges to absorb and retain required level of pollutants from stormwater runoff including total suspended solids, hydrocarbons, nutrients, soluble heavy metals, and other common pollutants. The filter cartridges clean stormwater through a passive filtration system and removes pollutants. Two filter cartridge chambers are proposed ie one for each of the catchments. The northern catchment filter chamber is 1.2m wide by 5.5m long and has 5x 690mm filter cartridges. The southern catchment filter cartridge chamber is 7.5m x 7.5m and has 10 x 690mm filter cartridges.

If storms higher than the design storm occur, the Site is graded to allow an overland flow path to form which protects the buildings. Overland flows will exit the Site via the main entry/exit on the western boundary.

Conclusion

A system has been proposed for the control of stormwater on the Site, which considers the requirements for water pollution control and quantity control. The proposed system will result in adequate environmental protection, reduce water pollutant loads based on modelling and satisfy the requirements of Inner West Council.

8.11.2. Flooding

A Flood Management Plan has been prepared by Richmond + Ross and included at **Appendix W.** The assessment has been prepared by reviewing published topographic maps, physical land survey, hydraulic and hydrological calculations, and available aerial photography.

A previous flood study prepared for the project catchment has been used as an input into the flood model. This flood study was originally prepared by WMA Water in 2013 and later updated by Cardno in 2017. The model was obtained from Council and consisted of a 1D-2D Tuflow hydraulic model.

In accordance with the Section 9.1 Ministerial Direction regarding Flood Prone Land, the assessment has considered the objectives of this direction which are:

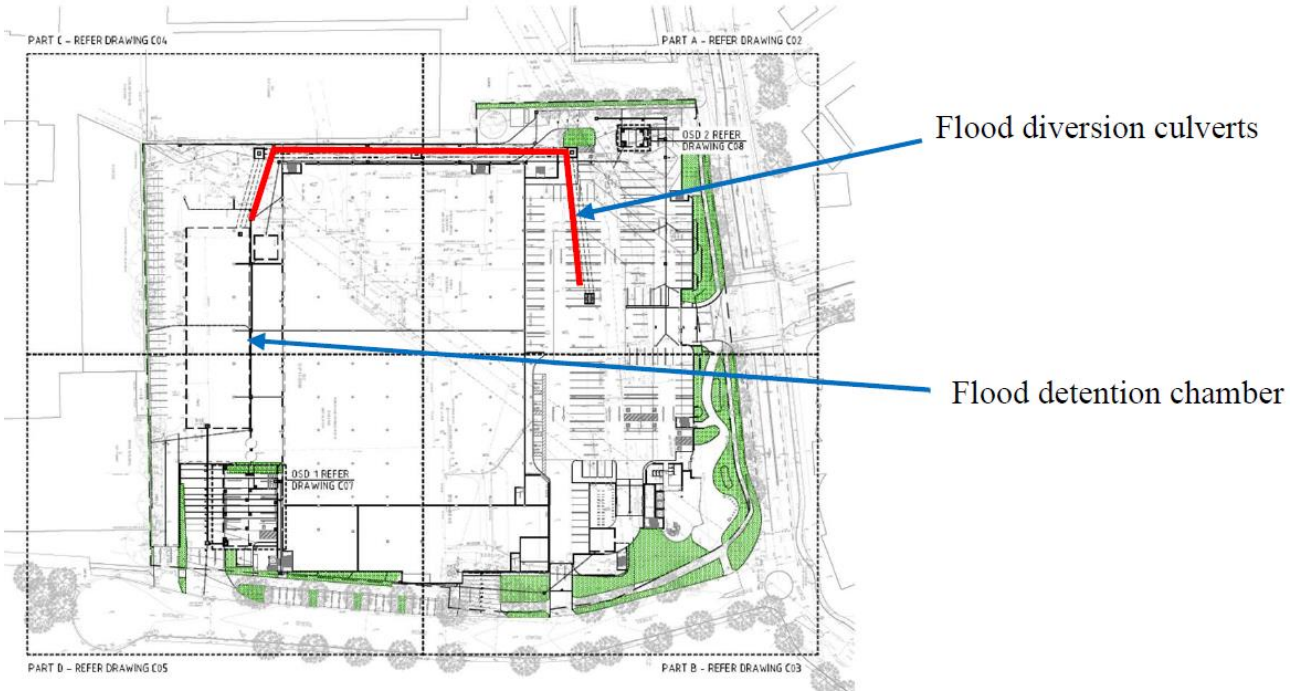
- *(a) to ensure that development of flood prone land is consistent with the NSW Government's Flood Prone Land Policy and the principles of the Floodplain Development Manual 2005, and*
- *(b) to ensure that the provisions of an LEP on flood prone land is commensurate with flood hazard and includes consideration of the potential flood impacts both on and off the subject land.*

Assessment

The key findings of the Flood Impact Assessment confirmed:

- Floodwaters enter the Site via Edinburgh Road as well as surcharge from a pit on the Sydney Water owned drainage culvert passing through the Site.
- The Site is subject to flood inundation during storm events greater than the two year average recurrence interval.
- The maximum depth of flow within the Site is less than 500mm.
- The flood hazard categorization is "low hazard".
- It is proposed to collect the flood flow via a network of pit inlets and divert it to an underground flood detention chamber via twin 1200x600 underground box culverts. The flood detention chamber is proposed with an approximate volume equal to the existing site's above ground 100yr recurrence interval flood storage.

Figure 31 Extract of Stormwater concept plan DWG C01



Source: Richmond + Ross

Post Development Flood Behaviour

Based on the model results and flood mitigation measures above, the expected flood depth during a 1% AEP storm event is less 0.4m and is located around the inlet to the within the car parking area. The maximum velocity of flow during a 1% AEP storm event is less than 1.2m/s.

The proposed development will result in a negligible increase in the flood depths during a 1% AEP storm event. A greater than 200mm reduction in flood depths can be expected within the neighbouring property 10-14 Lilian Fowler Place. The flooding within the site post development is categorised as low hazard during a 1% AEP storm event.

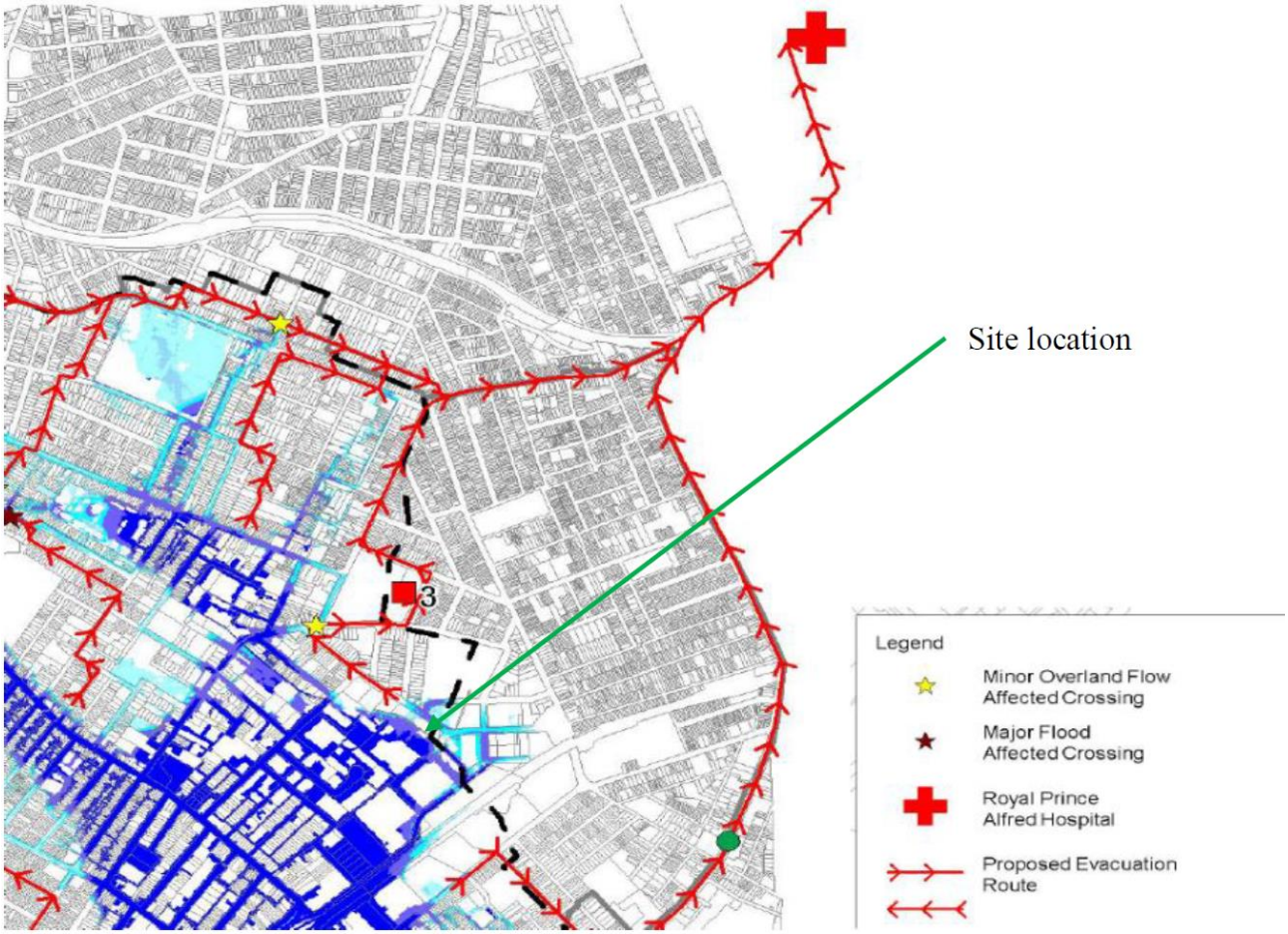
Evacuation

Evacuation from the Marrickville Industrial area is difficult as the area is expected to be significantly inundated within 30 minutes of the onset rainfall for both 1% AEP and PMF flood events. The Site is located within the outer regions of the Industrial area and therefore evacuation of the occupants within the Site is feasible.

Occupants with vehicles should exit the Site via the north-western driveway and head further north-west towards Victoria Road. At the intersection, vehicles can continue west onto Victoria Road and left onto Black Street and continue along the flood evacuation route shown below.

Pedestrian traffic can evacuate via the north-western driveway and towards Bourne Street and eventually continue north towards Black Street. Alternatively, occupants can wait for emergency evacuation services on Site as the Site is expected to be a low hazard area including during a PMF flood event.

Figure 32 Flood Evacuation Route



Source: Cardno 2017

- **Mitigation Measures**
- The following mitigation measures are proposed:
- Flood flow diversion channels and detention chambers and
- Flood proofing of habitable areas along the flood front to 300mm above the finished floor level (Floor level being 4.86mAHD).

Conclusion

Richmond + Ross have reviewed the proposed architectural drawings and confirm the development can be constructed at the proposed minimum level of FFL 4.86mAHD and meet Council's flood control requirements. Habitable areas along the flood front are to be flood proofed to the flood level plus a 300mm freeboard.

The proposed development will have no significant impact on current flood volumes, flood depths and existing flood hazard categories up to the 1% AEP storm event.

No additional private properties are expected to be inundated during a 1% AEP flood event because of the development. The proposed flood mitigation measures also minimise the increase in 1% AEP flood depth as far as practicable especially within private properties.

8.12. WASTE MANAGEMENT

A Waste Management Plan (**WMP**) has been prepared by Land & Groundwater Consulting and included at **Appendix M.** The WMP details the quantities and classification of all waste streams to be generated on site during construction and operation, provides details of waste storage, handling and disposal during the construction and operation of the development, includes plans of waste storage and collection areas and

details the measures that would be implemented to ensure that the development is consistent with the aims, objectives and guidance in the *NSW Waste Avoidance and Resource Recovery Strategy 2014-2021.*

8.12.1. Demolition and Construction Waste

Waste Generation

The primary waste streams expected to be generated by the demolition and construction works include excavation material, timber, tiles, metal, floor coverings, glass, bricks/pavers, concrete, plasterboard and fixtures and fittings. During demolition, a total of 1,120m³ waste will be re-used, 25,500m³ will be recycled and 420m³ will be disposed of.

Waste Storage and Collection

Waste storage locations will be accessible and allow sufficient space for storage and servicing requirements. These locations will be flexible in order to cater for the demolition and construction stages. The positions of the designated waste holding areas on site will change according to building works and the progression of the development, but will consider visual amenity, OH&S and accessibility in their selection.

Waste and recycling storage locations will be assigned during the demolition and construction works. The storage locations will provide adequate space to accommodate all waste and recycling bins associated with the demolition (up to approximately 22 x 1,000L bins) and construction (up to approximately 12 x 1,000L bins).

Figure 33 Demolition Waste Bin Plan

Source: ***Land & Groundwater Consulting***

Mitigation Measures

- Where space is restricted, dedicated stockpile areas are to be delineated on the site, with regular transfers to dedicated skip bins for sorting.
- All waste placed in stockpile areas/skips for disposal or recycling shall be adequately contained to ensure that the waste does not fall, blow, wash or otherwise escape from the site. Appropriate siting of

waste stockpile locations must take into account slope and drainage factors to avoid contamination of stormwater drains during rain events.

- Recycling bins must be accessible to all demolition and construction employees and must be clearly sign posted and colour coded to ensure segregation of waste and recycling is effective.
- Waste containers are to be kept clean and in a good state of repair.

8.12.2. Operational Waste

Waste Generation

The primary waste streams expected to be generated by the ongoing operation of the total development are summarised below.

Table 21 Estimated weekly operational waste

Type of Waste	Reuse	Recycling	Disposal	Method of on-site reuse, contractor and recycling outlet and /or waste depot to be used
Other waste – specify (eg. paints, PVC tubing)	0	0	<1m³ (GSW)	Waste Management Centre
Packaging (used pallets, pallet wrap)	0	<2m³	0	Recycling Outlet
Containers (cans, plastic, glass)	0	<1m³	0	Recycling Outlet
Paper/cardboard	0	<2m³	0	Recycling Outlet
Total	0	<5m³	<1m³	

Waste Storage and Collection

Waste storage locations will be provided within the loading docks area at the eastern and southern sides of the Warehouse (refer Figure 34) where the recycling bins, garbage skips, plastic and cardboard compactors will be stored prior to collection.

Sufficient space will be provided for the segregation and storage of varying waste types including provision for the collection of fluorescent tubes, smoke detectors, e-waste and other recyclable resources. Sufficient space will also be provided for reuse items such as crates and pallets for occupational safety purposes.

Doors and gates to the waste storage locations will be able to be opened from the outside and wide enough to allow for easy passage of waste/recycling containers.

Mitigation Measures

- Provide sufficient clearance to enable collection vehicles to access the locations of bin storage.
- Where possible collection times should not coincide with peak operational delivery schedules however all areas identified will not interfere with operational truck movements.
- The construction of locations for garbage storage are to comply with BCA (Building Code of Australia) requirements and Australian Standards, including CoC requirements for screening and fencing.
- Waste/recycling storage locations are to be constructed of an adequate size to accommodate all waste and recycling bins and bales associated with the development.

- Recycling bins must be accessible to all employees and must be clearly sign posted and colour coded to ensure segregation of waste and recycling is effective.

Figure 34 Operational Waste Bin Plan

Source: ***Land & Groundwater Consulting***

Waste Transportation

All wastes removed from the site must be transported in accordance with relevant road and transportation regulatory requirements. Where required (depending on the classification of the wastes), appropriately licensed transport contractors must be used.

The appointed transporters are responsible for ensuring they are appropriately licensed to:

- Carry the particular type of waste; and
- Transport the materials to an appropriately licensed facility.

Where the waste is classified as Restricted Waste or Hazardous Waste, the transporter is required to carry (subject to a number of exceptions) appropriately completed waste data forms with each load, and provide a copy to the waste facility to which the waste is taken.

8.13. INFRASTRUCTURE AND UTILITIES

8.13.1. Electrical Services

Shelmerdines Consulting Engineers have carried out a maximum demand assessment of the proposed warehouse facility for Woolworths Group to be located in Marrickville (**Appendix JJ).** The building will incorporate automations systems and refrigeration systems, of which the maximum demand calculation includes. The maximum demand has been calculated as 6,000kVA or 8,500Amps.

A Preliminary Enquiry was submitted to Ausgrid on the 6th August 2020. Ausgrid have advised that the site will need to have all existing transformers and high voltage infrastructure decommissioned and removed from the site prior to commencement of construction. New chamber type substations will be required to be established on the site. The chambers shall contain four (4) off 1,500kVA transformers to support the 6,000kVA load.

Additionally, there is existing capacity in the nearby 11kV high voltage network within the Marrickville and St Peters zone substations to support the proposed load. The connection point of the 11kV high voltage would be to the north of the site in Edinburgh Road as per the diagram below. It is proposed to provide a cross

connection in the 11kV network to the St Peters zone to provide supply reliability. Therefore, new dedicated high voltage feeders are not required to be installed to the Marrickville Zone Substation.

8.13.2. Water

A Sydney Water Asset review has been undertaken by MGP Building & Infrastructure and included at **Appendix S**. The report has been prepared to identify available infrastructure services and any impacts the proposed development will have on this infrastructure, specifically water supply, sewer and stormwater. It assesses the development's water demands and associated servicing requirements.

MGP Building & Infrastructure services lodged a request for Sydney Water's expected pressures and flows from the watermains. Clarification from Sydney Water via a Section 73 Feasibility application was obtained on the 4th September 2020. A copy of this advice is included at **Appendix T**.

Potable Water

- Sydney Water requires the property to have frontage to a suitably sized watermain.
- Sydney Water have identified that several existing DN150 watermains would be able to serve the requirements of the proposed building.
- Further investigations will be required for water supply for fire fighting purposes which will be developed during the project design phase.

Sewer

- Sydney Water requires the property to have a suitably sized sewer main located within the property boundary. Sydney Water have identified that several existing DN225 sewer mains would be able to serve the requirements of the proposed building.
- Further investigations will need to be undertaken to confirm the impact of the proposed development structure on Sydney Water's assets.
- The impact assessment will need to be undertaken in accordance with Sydney Water's Building Plan Approval Guidelines and assessed by Sydney Water prior to commencement of construction.

Stormwater

- Sydney Water have identified that the proposed building impacts on a stormwater main is located through the property.
- Sydney Water has requested the proposed building to comply with Sydney Water's building over stormwater policy. If a suitable resolution cannot be reached by maintaining the stormwater easement in its current location, alternative alignments can be accommodated on the to allow construction of the proposed building.
- Sydney Water's stormwater On Site Detention (OSD) requirements will be incorporated into the final development stormwater design.

As discussed in Section 7, on the 25th September a meeting between Woolworths Group, MGP Building Infrastructure & Services and Sydney Water took place. Sydney Water have advised they do not support building over their stormwater assets however have indicated that support could be provided for the relocation of the stormwater culvert. Woolworths Group have suggested deviating the stormwater culvert asset that currently runs through the proposed development. Stormwater culvert diversion plans were submitted to Sydney Water on the 14th October 2020 for review and comment. The Applicant continues to be in discussion with Sydney Water to provide an in-principal stormwater deviation concept plan.

8.14. HAZARDOUS MATERIALS

As discussed in Section 6.4, a SEPP 33 Assessment (**Appendix Q**) has been prepared by Riskcon to determine whether the facility is potentially hazardous and whether an additional risk assessment is required.

The results of the SEPP 33 assessment indicate the threshold quantities for the dangerous goods to be stored and transported are not exceeded and therefore SEPP 33 does not apply to the proposed development.

As the facility is not classified as potentially hazardous, it is not necessary to prepare a Preliminary Hazard Analysis for the facility as SEPP 33 does not apply.

8.15. CONTAMINATION

A Detailed Stage 2 Site Investigation Report has been prepared by JK Environments and DLA Environmental and included at **Appendix R.** The report provides a detailed assessment of the extent and nature of any contamination of the soil, groundwater and soil vapour, potential risks to human health and the environmental receptors in the vicinity of the site and a description of any required mitigation and monitoring measures.

Assessment

The following potential contamination sources were identified at the Site:

- Fill material – The Site appears to have been historically filled to achieve the existing levels. The fill may have been imported from various sources and could be contaminated.
- Chemicals and Fuel storage – The Site has been used for various commercial purposes. Four USTs, an LPG and four hydrogen tanks were identified in the SafeWork. Records indicated that the USTs and ASTs were used to store diesel and petrol. The exact location of these tanks could not be determined.
- Use of pesticides – Pesticides may have been used beneath the buildings and/or around the Site.
- Hazardous Building Material – Hazardous building materials may be present as a result of former building and demolition activities. These materials may also be present in the existing buildings/ structures on Site.
- Off-site Area 1 – A dry cleaner is located up-gradient of the Site and is considered to be a potential off-site source of contamination.

The DSI did not identify widespread soil or groundwater contamination. Minor elevations of individual metals were detected in the soil and groundwater above the ecological Site Assessment Criteria (**SAC**). A detection of friable asbestos (**AF/FA**) was encountered in the fill in borehole BH117. The concentration of AF/FA was below the SAC.

The Detailed Site Assessment has been reviewed by a NSW EPA Accredited Site Auditor. A copy of the Site Audit Statement and Report has been included at **Appendix KK.** The Site Audit Statement notes that whilst the results of the DLA and JKE investigations have not identified significant contamination of soil or groundwater at the site, based on the site history and the limitations associated with the sampling and analysis for asbestos in soils, there is the potential for asbestos impacted fill materials to be present at the site that will require remediation or management during the redevelopment. There is also the potential that unidentified sources of contamination may be encountered, such as underground tanks or subsurface structures. It is recommended that a RAP is prepared for further assessment and remediation during demolition and redevelopment of the site.

Mitigation Measures

The Detailed Stage 2 Site Investigation Report provides the following mitigation measures:

- Complete a Hazardous Building Materials Assessment (Hazmat) for the existing structures at the Site;
- Prepare and implement an Asbestos Management Plan for soil disturbance in the vicinity of BH117;
- Prepare and implement an Unexpected Finds Protocol for the development works; and
- Prepare and implement an ASS Management Plan for the proposed development.

The following should also implemented in the event of an unexpected find:

- All work in the immediate vicinity should cease and temporary barricades should be erected to isolate the area;
- A suitably qualified contaminated land consultant should be engaged to inspect the find and provide advice on the appropriate course of action. In the event that the unexpected find triggers remediation, the requirements of SEPP 55 must be addressed (e.g. notifications to Council); and

- Any actions should be implemented and validated to demonstrate that there are no unacceptable risks to the receptors.

The Site Auditor has also identified the following mitigation measures:

- Preparation of a remedial action plan (**RAP**) in accordance with the NSW EPA (2020) *Consultants reporting on contaminated Land: Contaminated land guidelines.*
- The RAP should be reviewed by a NSW EPA Accredited Site Auditor.
- Preparation of a final site validation report by a qualified environmental consultant documenting the works undertaken in accordance with the RAP and certifying the suitability of the site for the proposed development.
- Preparation of an Environmental Management Plan (**EMP**) for the management of any contamination remaining on site following redevelopment that presents a risk to human health or the environment.
- Preparation of a Section A Site Audit Statement by a NSW EPA Accredited Site Auditor reviewing the above information and confirming the suitability of the site for the intended use.
- Groundwater has not been assessed for beneficial re-use. Any future use of groundwater would require appropriate regulatory approvals from the NSW Office of Water.

Conclusion

Based on the findings of the investigation, JKE are of the opinion that the Site is suitable for the proposed development.

8.16. CONSTRUCTION

A Draft Construction Management Plan (**CMP**) has been prepared by Root Partnerships and included at **Appendix N** to demonstrate future construction impacts can be appropriately managed and mitigated.

Public safety will be managed through hoarding which will be used to separate the live construction site from the public. The selected hoarding type, built to standards produced by Workcover and the Inner West Council, will enclose all site boundaries and where required, and provide protection to adjoining buildings. A gantry over a nearby bus stop on Edinburgh Road may be required.

The CMP also outlines measures to mitigate:

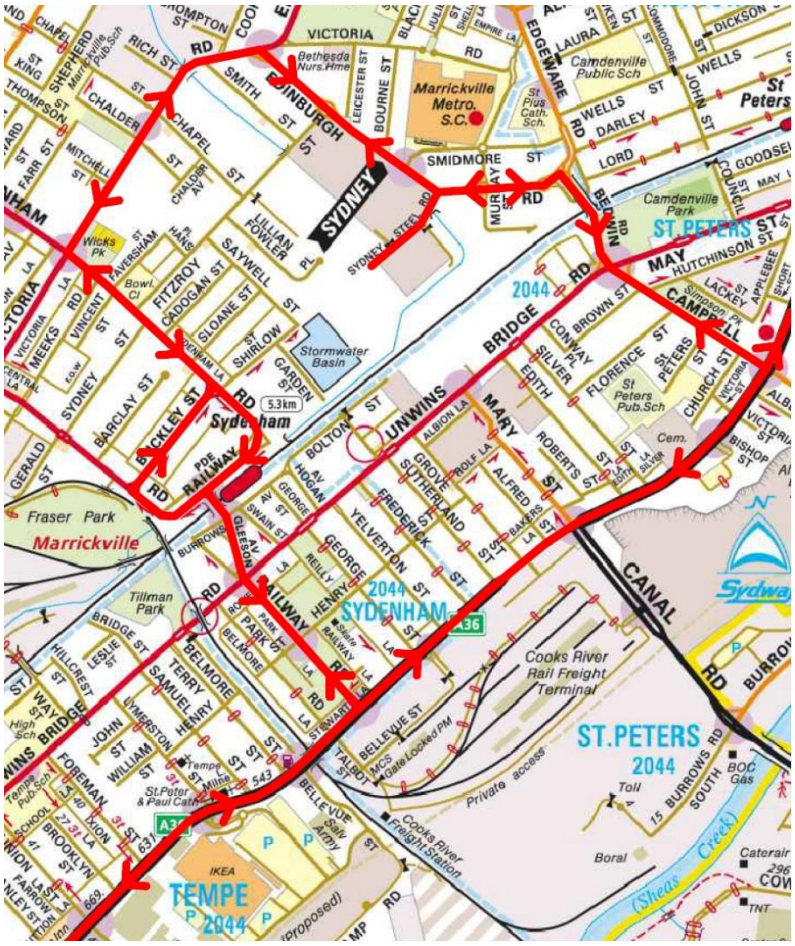
- Sediment and erosion controls, earthworks and stormwater.
- Dust control.
- Noise and vibration.
- Ecological sustainability.
- Heritage and archaeology.
- Materials handling.
- Waste management.
- Utilities and services.

Traffic Management

The Contractor will prepare a detailed Traffic Management Plan prior to the issue of a Construction Certificate. A suitable vehicle hold/staging point will be nominated outside the site area to facilitate the coordination as deliveries arrive and are unloaded. Due to the scale of the site it is expected that trucks will be able to move in forward directions both when entering and exiting the site reducing risk of accidents and increasing efficiency of deliveries.

Vehicular access to and from the Site will be provided from Edinburgh Road and Sydney Steel Road. Trucks will travel to and from the Site along the designated routes shown in Figure 35.

Figure 35 Proposed Truck Routes



Source: CBRK

The designated truck routes to and from the Site are proposed to restrict truck traffic to the main road network through the area. The approach and departure route of construction vehicles to and from the Site are considered appropriate.

The number of vehicles generated during the various stages of construction is likely to be up to some 50 to 100 vehicles per hour two-way at peak times. This compares to operational traffic generation of some 230 vehicles per hour two-way. The effects of construction vehicle activity on the surrounding road network will therefore be less than the operational effects.

Construction vehicles will access the Site from Edinburgh Road and Sydney Steel Road. Employee numbers will vary over the construction period but will be generally be some 30 to 60. Employees will be able to park on the Site, as parking areas become available.

Street Closures

For works to be completed safely, some temporary street closures may be required. These closures will be well planned in advance by the Contractor, with approvals sought from relevant Authorities. Activities that may require a street closure include tower crane erection and dismantling and installation of major plant and structure. Wherever possible these closures will be scheduled for non-peak times. A specific management plan will be established to ensure the best possible outcome.

Pedestrian Safety and Site Access

Pedestrian access will be maintained along both roads at all times and will be managed by Traffic Control. A work zone will be established on Sydney Steel Road immediately in front of the Site and therefore pedestrian traffic will be directed to the footpath on opposite side of Sydney Steel Road.

Pedestrian direction signs will be installed on both primary and secondary frontages to advise road users of changed traffic conditions. No unauthorised personnel will be permitted within the Site unless accompanied by the site supervisor.

In accordance with OH&S requirements all visitors accessing the site will be required to wear PPE to ensure that they are visible to moving traffic.

Emergency Vehicle Access and Police Vehicles

During all stages of construction, care will be taken to ensure there is no disruption to the path of emergency vehicles on the public roadways bounding the site. The Contractor will be responsible for coordinating deliveries to Site to minimise disruption to emergency vehicle movements along Edinburgh Road and Sydney Steel Road.

Mitigation Measures

The following mitigation measures are proposed:

- Once appointed, the builder will be responsible for preparation of a detailed construction traffic management plan, to refine the staging and timing.
- Signage, fencing, overhead protection, safety barriers and line marking details, as required, are to be provided in accordance with Australian Standards 1742 and the Roads and Maritime Services' Manual for Traffic Control at Work Sites.
- A copy of the traffic management plan must be kept on-site at all times.
- Signage details, the control of pedestrians in the vicinity of the Site, and the control of trucks to and from the Site will be the responsibility of the site contractor.
- Construction vehicle access to be provided from Edinburgh Road and Sydney Steel Road;
- Where required, the movement of trucks on and off the Site to be managed and controlled by traffic controllers in accordance with a safe work method statement and appropriate traffic control plans;
- Truck movements to and from the Site to be restricted to the designated truck route shown in Figure 35;
- Class A construction fencing, and overhead protection where required, to be provided adjacent to the site frontages;
- Openings to be provided in the construction fence for access to the Site for construction vehicles;
- Pedestrian activity across the Site access driveways must be managed and controlled by traffic controllers where required;
- Pedestrian warning signs to be utilised in the vicinity of the Site;
- Pedestrian arrangements, construction activity and erection of safety fencing is to be provided in accordance with SafeWork NSW requirements; and
- Construction signage to be provided in accordance with Australian Standards and the Roads and Maritime Services' Manual for Traffic Control at Work Sites.

8.17. BUILDING STANDARDS

8.17.1. Building Code of Australia

McKenzie Group Consulting has undertaken an assessment of the architectural design documents prepared by Nettleton Tribe against the Deemed-to-Satisfy (DTS) provisions of the relevant sections of the Building Code of Australia (**BCA**) and applicable Building Regulations (**Appendix Y**). The report is intended as an overview of the relevant provisions of the BCA for assistance only. Detailed drawings and associated review will still be required as the final design is developed.

Assessment

The assessment of the design documentation has revealed that the following areas are required to be assessed against the relevant performance requirements of the BCA, as they deviate from the deemed-to-satisfy provisions of the BCA:

- Perimeter access to the development;
- Openings to the south western elevation;
- Egress points;
- Hydrants;
- Fire hose reel lengths;
- Smoke hazard management system;
- Directional exit signage;
- Perimeter emergency vehicular access;
- Weatherproofing of external walls.

Mitigation Measures

Performance solutions to the above non-compliances have been proposed by the design team to justify the non-conformances with the Deemed-to-satisfy provisions. The Performance Solutions are to be prepared by a suitably qualified fire engineer in consultation with Fire & Rescue NSW.

The assessment identified that additional information is required to complete the assessment and/or several areas need to be reviewed. Documentation to enable assessment and demonstrate compliance will be required to address the above items prior to approval. Further information is required on the following:

- Confirm height of the development and whether Level 7 is considered a storey;
- Advise of alternative building solutions with regard to design of building services;
- Submit fire service coverage drawings;
- Confirm if any lightweight fire-resistant construction is proposed to be utilised;
- Services engineer to mark-up floor plans confirming intended use of all services and plant rooms within the building;
- Provide details of staff and population numbers;
- Review final stair details;
- Review balustrade and barrier details;
- Provide details of FIP locations;
- Submit Section J Report or JV3 assessment report;
- Submit Access Report; and,
- Submit Test reports of the proposed external wall systems.

Conclusion

McKenzie Group Consulting confirm the development is capable of complying with the relevant requirements of the *Environmental Planning and Assessment Act*, *the Regulations* and the *Building Code of Australia*. A compliance strategy to achieve compliance with the provisions of the BCA will be through a combination of deemed-to-satisfy and Performance Based solutions.

8.17.2. Access

Assessment

An Access Report has been prepared by Morris Goding Access Consulting (**Appendix X**) to ensure that ingress and egress, paths of travel, circulation areas, and sanitary facilities comply with relevant statutory guidelines, and in addition, compliance with a higher level of accessibility and inclusiveness benchmarks set by the project.

The proposed development falls under a number of BCA classifications:

- Class 5 (commercial / office);
- Class 7a (carpark); and,
- Class 7b (warehouse).

The proposed design will utilise the following guidelines to provide reasonable access provisions for people with disabilities. The design will be developed to ensure the principles of the DDA are upheld.

- Federal Disability Discrimination Act (DDA);
- Disability (Access to Premises – Buildings) Standards 2010;
- Building Code of Australia (BCA) Part D3, F2, E3;
- AS 1428.1:2009 - (General Requirement for Access);
- AS 1428.4.1:2009 - (Tactile Ground Surface Indicators);
- AS 2890.6:2009 - (Parking for People with Disabilities);
- AS 1735.12:1999 - (Lift Facilities for Persons with Disabilities);
- Inner West Local Council DCP.

Mitigation Measures

Ingress and Egress

MGAC has reviewed the drawings and documentation in relation to the aforementioned requirements. On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

Entrances

On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved

Emergency Egress

There is currently no mandatory requirement within BCA or DDA Premises Standards for provision of independent accessible egress for people with a disability in accordance AS1428.1 and this remains an important DDA issue. Consideration of an accessible egress strategy with emergency evacuation plan will be needed and consideration of management systems and fire wardens for emergency egress for people with Disabilities.

Paths of Travel

The following must be complied with:

- Provide a passing bay where there is no direct line of sight.
- Provide 1540mm x 2070 at the end of corridors (within 2-meters) noted on the mark-ups.
- All commonly used doors (staff and visitors) are to provide 530mm (internal) latch side clearance, 510mm (external) latch side clearance compliant with AS1428.1, Fig. 31(h).

- Ensure all external on-grade crossings are designed in accordance with BCA/DDA Access Code Part E3.6 and AS1735.12.

Passenger Lifts

On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

Stairs and Ramps

On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved

Sanitary Facilities

Provide UAT (Unisex accessible toilets) adjacent to male and female banks in accordance with AS1428.1 and DDA Premises Standards. Ensure the balance requirement is achieved for nominated pan hand transfer locations.

Accessible Car parking

On the basis of the current level of detail all access requirements appear capable of achieving compliance. Further work will be required during design development stage to ensure appropriate outcomes are achieved.

Conclusion

MGAC has assessed the proposed development and conclude that accessibility requirements, pertaining to external site linkages, building access and parking can be readily achieved. However, common area access and sanitary facilities need some adjustments to achieve compliance.

MGAC will continue to work with the project team as the scheme progresses to ensure appropriate outcomes are achieved in building design and external domain design.

8.17.3. Fire Safety

Fire & Rescue NSW have reviewed the documentation that was provided in support of the Scoping Report and have advised they will provide comment once approvals have been granted and the project has progressed such that there is more relevant detailed information available.

Consultation will continue to occur with Fire & Rescue NSW with respect to the proposed fire and life safety systems and their configuration at the project's preliminary and final design phases.

8.18. SOCIAL AND ECONOMIC IMPACTS

8.18.1. Economic Impacts and Employment Generation

A Social and Economic Report has been prepared by Hill PDA and included at **Appendix K.** It includes an analysis of the economic and social impacts of the development, including any potential benefits to the community and potential impacts upon demand for supermarket floor space and existing retail centres within the surrounding area.

Assessment

Pre-construction

The Site currently contains three industrial/warehouse buildings with an estimated GFA of 10,650sqm. Based on average employment densities, the Site currently accommodates around 43 jobs and contributes approximately $4 million to Australia's gross domestic product (**GDP**).

The estimated direct construction cost of $144.4 million will generate a further $185 million of activity in production induced effects and $131 million in consumption induced effects. The total economic activity generated by construction of the proposed development would be around $460 million.

Every one million dollars of construction work undertaken generates 2.50 job years directly in construction. Based on an estimated construction cost of $144.4 million the proposal would directly generate 361 job years directly in construction (i.e. one full time job for each year).

Post-construction

Post construction the development would provide a total of around 39,510sqm of employment space. Upon completion, the development would provide a total of 660 jobs. This represents an increase of around 617 jobs when compared to the existing development. The breakdown of this employment on-site by particular land use is provided in the table below.

Table 22 Estimated employment generation

Land Use	**No. of Workers**
Online grocery shopping	264
Courier pick-up and delivery	106
Office	210
General warehousing	80
Total Employment	660

Based on IBIS World Industry Reports, HillPDA has estimated the worker salary generated at approximately $36.1 million per annum. This represents an increase of around $33.3 million per annum over the Base Case. It is estimated the proposed land uses would potentially contribute $50.1 million every year to the local economy. This represents an increase of around $46.1 million per annum over the Base Case.

Demand for supermarket space

HillPDA undertook a detailed land use survey in 2019 for each commercial centre within the Inner West LGA. This audit found that the Inner West provided a total of around 45,610sqm of supermarket space. Marrickville Centre currently provides 5,050sqm of supermarket and grocery space.

HillPDA have undertaken a retail demand assessment for supermarket space across the Inner West LGA. Consideration has been given to a report prepared in 2015 by the Greater Sydney Commission which considers the current supply and projected retail needs for Sydney. Given the rates in the report were for 2015, the rates have been projected out to 2020 and 2036 based on the reports medium services average change in retail provision rates by supermarket type.

Applying these per capita rates to the Inner Wests current and projected resident population, it is estimated that the LGA could support up to 60,230sqm of supermarket floorspace in 2020, increasing to 70,390sqm by 2036. This represents an increase of around 10,165sqm over the period, of which, the majority (78%) is for larger supermarkets over 1,000sqm.

Currently the LGA provides around 45,610sqm of supermarket space. The per capita method suggests its resident population demand around 60,228sqm of space and implies an undersupply of around 14,615sqm. This undersupply is forecast to increase to around 25,000sqm with no additional supply.

Online sales generated by Inner West residents in supermarket goods is expected to almost double over the next 11 years. It is expected to capture only 8.2% of total supermarket sales – up from the current level of 5.1%. Traditional supermarket sales are expected to increase from $950m to $1,122m over the same period – an increase of $172m.

The LGA will require a further three full line supermarkets to keep up with demand over this period. Accordingly, the Hill PDA assessment concludes that online sales will have no adverse impact on the viability of existing stores.

The assessment also considered the forecast population, supermarket spend and online grocery sales in the Inner West LGA. The assessment found that existing supermarkets would not be threatened by the inclusion of dark stores in the locality.

Online grocery shopping (including both delivery and customer pick-up) captures only a small proportion of total trade and growth. Growth in traditional sales in supermarkets is expected to continue at a rate of $17m every year over the next 10 years. Accordingly, the online pick-up facility is not considered to have an adverse impact on existing supermarkets in the locality and is consistent with the existing approval (DA 2017/00212).

8.18.2. Social Impacts

The Social Impact assessment is informed by the analysis above and scoping of potential impacts using the DPIE Social Impact Assessment scoping template.

Assessment

The potential impacts arising from the proposed development are summarised below:

Community Values

- Improved access to livelihood and opportunity to earn capital both during construction and operation will have a positive impact on social cohesion in the surrounding area.
- Development with active frontages and opportunities for passive surveillance have the potential to attract crime and behaviour that could potentially negatively affect surrounding community health and safety.

Amenity

- Risk of reduced amenity during construction (noise, air and visual impacts arising from construction activity).
- Potential operational noise disruptions from 24/7 activity on site and vehicle movements.
- Minimal potential air quality impacts from vehicle movements (considering existing industrial usage of site as baseline).
- Increased amenity from planned landscaping providing visual interest for the streetscape as well as natural habitat for the local ecosystem.

Employment

- The proposal will add employment directly and indirectly to the area, significantly improving local access to employment (on site and in the surrounding community) and improving overall livelihood, specifically:
- During construction it is expected to generate 1,240 job years in construction.
- When operational it will generate 660 jobs, a significant increase from current operations on site.

Population Growth

- The proposal will positively contribute to meeting the additional demand for employment from the rapidly growing population in the area.
- The proposal will create direct and indirect employment within the LGA.
- The proposal will provide additional services and amenity to local residents.

Access and Connectivity

- The proposal will add additional vehicles to the road network, potentially increasing local road congestion.
- Approximately 50 to 100 vehicles per hour two-way at peak times during construction, accessing the site via Edinburgh Road and Sydney Steel Road.
- Approximately 220 to 250 vehicles per hour two-way at peak times during operation, accessing the site via Edinburgh Road and Sydney Steel Road.

- During operation 10 - 15 semi-trailers are expected per day for inbound delivery, no b-doubles are proposed to be used as they are typically the most disruptive to local traffic movement.
- Improved access to local employment opportunities residents.
- Additional workers will likely increase pressure on local public transport network

Demand on Services

- The proposal is likely to employ 660 workers, potentially adding to demand for child care in the area surrounding the Site.

Mitigation Measures

The following mitigation measures are proposed:

- Incorporate Crime Prevention Through Environmental Design (CPTED) principles into the proposal to hinder anti-social behaviour on Site.
- Prepare a Construction Management Plan prior to commencement of works with appropriate detailed mitigation measures.
- Limit vehicle movements between 11pm and 6am and manage accordingly with neighbouring properties.
- Provide on-site parking for employees to reduce potential stress on public transport network.

8.18.3. Crime and Safety

A Crime Prevention Through Environmental Design (**CPTED**) Report has been prepared by Hill PDA (**Appendix II**) to address the potential for anti-social and criminal behaviour within and around the development. The report assesses crime risks by applying CPTED principles and recommends mitigation measures to manage safety and security.

Following a review of the design drawings and a meeting with the Applicant, a number of areas have been identified that demonstrate that CPTED is incorporated into the design. Where applicable, recommendations to enhance or supplement existing CPTED design features have been made.

Assessment and Mitigation Measures

Table 23 CPTED Assessment

Principle	Assessment	Mitigation Measure
Natural Surveillance	▪ The 24/7 operation and regular movement of delivery vehicles provides the opportunity for surveillance at all times. ▪ The extensive glazing on all outward facing aspects of the office provides opportunities for surveillance. ▪ Glazing and illumination of the entrance lobby will allow building security and staff to observe areas around the main pedestrian entrance. ▪ Obstructions that might impact sight lines from the lobby have been avoided where possible.	▪ Surveillance opportunities from the office space should be maximised by the placement of desks or canteen seating close to windows. ▪ Natural surveillance needs to be maintained by restricting vegetation growth that obscures lines of sight between 0.5m-2.0m above ground level. ▪ Consideration should be given to installation of convex mirrors adjacent to access / egress points on Sydney Steel Road to allow pedestrians or cyclists to detect vehicles exiting the Site.

Principle	Assessment	Mitigation Measure
	▪ There are a limited number of structural columns present, reducing opportunity for concealment or shadow formation. ▪ The placement of bike parking in front of the lobby allows reception staff to keep this parking under surveillance. ▪ Landscaping along the Edinburgh Road frontage is low, with few opportunities for concealment. ▪ At ground level, the car park is bound by a low wall with visually permeable aluminium screening atop. This design minimises opportunity for concealment behind the wall and retains sightlines between the car park and external areas. ▪ The online order pick-up facility will increase activation in the car park through the presence of pick up staff and the frequent movement of patrons through the pick-up facility and car park.	▪ Reduce the extent of the wall by the main delivery access (south corner of the Site) to improve sight lines. ▪ External lighting should be extended to the Site boundary, car park areas, and footpaths bordering the Site. Lighting levels should be balanced to support surveillance, whilst preventing contrast and glare. This is particularly relevant where paths connect into the Shared Use Path connecting to Sydenham Station. ▪ Ensure lighting design satisfies requirements of AS1158.3.1 Lighting for Roads and Public Spaces Pedestrian Area (Category P) Lighting - Performance and Design Requirement. ▪ To maximise visual permeability, the aluminium screens should be painted in a dark colour. ▪ Routes through the car park should be kept as wide as possible, with lighting throughout. This is particularly relevant where paths connect into the Shared Use Path leading towards Sydenham Station. ▪ Bin stores should be located within the building and secured to remove concealment opportunities. ▪ The following should be considered as part of the extensive electronic security design: ▪ Install a quality, vandal resistant system; ▪ Display signage identifying that CCTV is operating;

Principle	Assessment	Mitigation Measure
		▪ Ensure the cameras are installed to maximise surveillance opportunities along boundaries, and access points and vulnerable areas such as the Return and Earn facility. Ensure the camera views are not obstructed.
Territorial Reinforcement	▪ The ground floor car park includes roller shutters at the entrance and exit and a boundary comprising low walls topped with aluminium screens that restrict access whilst retaining visual permeability. These design features will help restrict unauthorised access to the car park. ▪ The location of paths along Edinburgh Road and Sydney Steel Road direct footpath users away from entrances and exits where possible, increasing the opportunity for pedestrians and cyclists to detect movement of vehicles leaving the site, and so avoid conflict.	▪ As well as signage on building entrances, signage should be considered along Sydney Steel Road - in particular, at the intersection with the Shared Use Path to Sydenham Station. ▪ Landscaping should be sufficiently dense that it deters pedestrians from crossing it but should not provide opportunity for concealment or restrict line of sight.
Access Control	▪ Semi-private space around the building is defined by the use of low walls, that can be used as seating, providing opportunities for natural surveillance. ▪ Vehicle access control via roller shutters and visually permeable barriers applied in the car park area helps reduce unauthorised entry. ▪ The positioning of entry and exit points have been carefully considered to optimise site operation, and signage elevations indicate that access and egress will be clearly defined. This reduces conflict between those seeking to access the Site and passers-by. ▪ These CPTED features are supported by the installation of roller shutters and / or gates at access points and the wall and screening around the ground floor car park, which will aid in the restriction of access.	▪ Design drawings indicate that external doors from stairwells etc open outwards in all locations. When door schedules are being prepared, the incorporation of viewing panes should be considered.

Principle	Assessment	Mitigation Measure
Space Management	▪ The use of landscaping walls as seating provides activation to the front of the building. ▪ The proposed materials appear to indicate a low maintenance burden. A site that is regularly maintained supports many of the preceding principles and features.	▪ Placement of the Return and Earn close to street parking on Sydney Steel Road. The Return and Earn facility is anticipated to be very busy which provides opportunity for mutual support between the facility, the street parking and the Shared Use Path. This increases the perception of risk to an offender, which may be enough to deter them from acting. ▪ Lighting needs to be incorporated into a regular maintenance plan to ensure lights are working and lux levels are maintained. ▪ Light fixtures should be reliable, easy to maintain, able to withstand the elements and vandal resistant. ▪ Whilst maintenance burden should be minimised, so that it is effectively completed, the presence of maintenance crews can provide further informal surveillance during periods of operation. ▪ Maintenance plan details are not yet available for review, but the need for maintenance needs to be considered at an early stage in the design.

8.19. SUITABILITY OF THE SITE

The proposed development is considered suitable for the Site for the following reasons:

- The proposal protects existing industrial land by retaining the existing land zoning and proposing a predominantly industrial development.
- The ancillary office space is directly associated with the warehouse operations and therefore will not detract from the underlying objective of the land use zone which is to provide a range of industrial, warehouse and related land uses.
- The site provides opportunities for the provision of increased jobs and employment throughout the construction and operational stages of development across the Site.

- The Site is located close to public transport and residential dwellings to facilitate 30-minute cities.
- The Site is in a highly accessible location, mid-way between Sydney Airport and Western Sydney, and will operate 24/7.
- The development will provide warehouse and distribution facilities and jobs close to where people live.

8.20. PUBLIC INTEREST

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

- The proposed warehouse and office provide significant employment opportunities in the short-term through construction (361 direct jobs). In the long term, the development will generate approximately 660 jobs.
- The proposal will deliver a high-quality development that significantly improves the streetscape presentation of the Site when viewed from Edinburgh Road and Sydney Steel Road.
- The detailed design of the office component supports an activated public domain during the day and evening through the glazed facades, outdoor breakout spaces for employees and a landscaped front setback.
- The proposal maintains solar access to surrounding residential areas and adjoining properties.
- The proposed development respects the industrial history and character of the place and will not obstruct or impact the vicinity heritage items in any way.
- The proposal will encourage the use of public transport and active travel such as walking and cycling due to the provision of end of trip facilities and proximity to Sydenham Metro Station.

9. ENVIRONMENTAL RISK ASSESSMENT

9.1. RISK ASSESSMENT

The SEARs require an environmental risk analysis to identify potential environmental impacts associated with the proposal.

This analysis comprises a qualitative assessment consistent with the methodology used for the concept DA and the Australian Standard AS4369:1999 Risk Management and Environmental Risk Tools. The level of risk was assessed by considering the potential impacts of the proposed development prior to application of any mitigation or management measures.

- The significance of the impact is assigned a value between 1 and 5 based on:
- The sensitivity of the environment receiving the impact;
- The level of understanding of the type and extent of the impact;
- The likely response to the environmental consequence of the project.

The manageability of the impact is assigned a value between 1 and 5 based on:

- The complexity of mitigation measures;
- The known level of performance of the mitigation measures proposed;
- The opportunity for adaptive management.

The sum of the significance and manageability values provides an indicative ranking (between 1 and 10) of the potential residual impacts after the mitigation measures are implemented. The risk levels for likely and potential impacts were, therefore derived using the following risk matrix.

Table 24 Risk Matrix

		MANAGEABILITY OF IMPACT				
		A – COMPLEX	B – SUBSTANTIAL	C – ELEMENTARY	D – STANDARD	E – SIMPLE
SIGNIFICANCE	5	High	High	Medium	Low	Very Low
	4	High	High	Medium	Low	Very Low
	3	Medium	Medium	Medium	Low	Very Low
	2	Low	Low	Low	Low	Very Low
	1	Very Low	Very Low	Very Low	Very Low	Very Low

The results of the environmental risk assessment for the detailed SSDA are presented in Table 25. Following the application of each of the mitigation measures, only 3 residual risks are identified that have a risk profile of 'medium' or greater, including:

- Loss of trees;
- Potential odour emissions generated from the chicken rotisserie and bakery operations, dust soiling impacts during construction activity and health or nuisance impacts during demolition and construction works;
- Compliance with Sydney Water's building over and adjacent to Sydney Water stormwater assets policy and guidelines.

These risks can be appropriately managed through the minimisation and mitigation measures which are proposed as part of this application.

Table 25 Risk Assessment

Aspect	Potential Impact	Significance	Manageability	Risk Level
Built Form and Urban Design	Bulk and scale of proposed warehouse and ancillary office. Variation to FSR control.	3	D	Low
Landscape	A public domain that does not integrate or operates in conflict with the surrounding area.	3	D	Low
	Loss of trees.	3	C	Medium
Visual Impact	Impacts on the surrounding context.	2	D	Low
Overshadowing	Potential shadow impacts to adjacent public open space and private open space within the site.	3	D	Low
European Heritage	Imposition on surrounding heritage listed items	2	D	Low
Aboriginal Heritage and Archaeology	The potential for in-situ Aboriginal archaeological deposits to be found on site.	3	D	Low
Traffic	Increased traffic on local roads (Operational).	3	D	Low
	Increased traffic on local roads (Construction).	3	D	Low
	Additional demand for on-street car parking spaces (Operational and Construction).	3	D	Low
Pedestrian management	Conflict with pedestrian and cycle/vehicle operations (Operational).	3	D	Low
	Conflict with pedestrian and cycle/vehicle operations (Construction).	3	D	Low
Biodiversity	Loss of biodiversity values as a result of the development.	2	C	Low
ESD / Environmental Performance	Irreversible increase in energy usage.	2	C	Low

Aspect	Potential Impact	Significance	Manageability	Risk Level
Solar Reflectivity	Adverse impact on reflectivity of the proposed buildings on public domain, pedestrians and motorists.	2	D	Low
Air Quality and Odour	Air quality, odour and dust emissions (construction)	4	B	High
Noise and Vibration	Adverse noise and vibration impact upon neighbouring sensitive receivers during operation.	2	D	Low
	Adverse noise and vibration impact during construction	3	D	Low
Flooding	Site inundation during flood events and stormwater system capacity.	2	C	Low
Stormwater Quality	Adverse impact on the quality of stormwater runoff (Operation	2	D	Low
	Adverse impact on the quality of stormwater runoff (Construction).	3	D	Low
Waste Management	Waste production (Operation).	2	D	Low
	Waste production (Construction).	2	D	Low
Hazardous Materials	Exposure to hazardous materials.	3	D	Low
Airspace	Impact on prescribed and protected airspace	2	D	Low
Contamination	Health and ecological impacts risks from presence of contaminants.	3	D	Low
Construction	Impacts associated with public safety, visual amenity, noise, waste and traffic management in the locality during construction.	3	D	Low
Infrastructure provision	Adequate connection to infrastructure and utilities and adequate infrastructure capacity.	3	C	Medium
Building Standards	Adequate access for people with a disability.	2	D	Low
	Adherence to Building Code of Australia	2	D	Low

Aspect	Potential Impact	Significance	Manageability	Risk Level
Crime and Safety	Adverse impact on the safety and security of local community.	3	D	Low
	Antisocial and criminal behaviour.	3	D	Low
Cumulative	Cumulative impacts (traffic, noise, dust, etc.) associated with construction and other development in the area.	3	D	Low

9.2. MITIGATION MEASURES

The measures identified to mitigate the potential environmental impacts of the proposed development are described in detail within Section 8 of the EIS and summarised in the table below.

Table 26 Mitigation Measures

Item	Potential Impact	Mitigation Measure
Built Form and Urban Design	Bulk and scale of proposed warehouse and ancillary office and variation to FSR control.	Maintain engagement with the 'design Architect' through the detailed design of the proposed development.
Landscape	A public domain that does not integrate or operates in conflict with the surrounding area.	Adopt and implement landscape plan prepared by Site Image (**Appendix J**) and mitigation measures within the Arborist Report prepared by Naturally Trees at **Appendix I.** These include: ▪ **Protection of retained trees** –tree sensitive construction measures must be implemented as prescribed by AS 4970 – 2009 *Protection of trees on development sites.* Excavation works required to be undertaken within the TPZ should be performed by hand under the supervision of the project arborist. Works are to be carried out in accordance with the Arboricultural Method Statement prepared by Naturally Trees. ▪ **Replacement planting** – in accordance with the new landscaping scheme proposed and included at **Appendix J**. The proposed landscaping scheme includes semi-mature trees to be planted in prominent locations. The new trees should have the potential to reach a significant height without excessive inconvenience and be sustainable in the long term.
	Loss of trees.	

Item	Potential Impact	Mitigation Measure
Visual Impact	Impacts on the surrounding context.	Maintain proposed building envelope as per Architectural Plans prepared by Nettleton Tribe (**Appendix C**).
Overshadowing.	Potential shadow impacts to adjacent public open space and private open space within the site.	Maintain proposed building envelope as per Architectural Plans prepared by Nettleton Tribe (**Appendix C**).
European Heritage	Imposition on surrounding heritage listed items	Adopt the recommendations of the Heritage Impact Statement (**Appendix G**) prepared by Urbis.
Aboriginal Heritage and Archaeology	The potential for in-situ Aboriginal archaeological deposits to be found on site.	Adopt the recommendations of the Historical Archaeological Assessment (**Appendix EE**) and complete the Aboriginal Cultural Heritage Assessment prior to the determination of the SSDA (**Appendix P**). A copy of the draft ACHA has also been provided at **Appendix P.**
Traffic	Increased traffic on local roads (Operational).	Provision of a maximum of 371 car spaces and 106 bicycle spaces as per the Transport, Traffic and Parking Report prepared by CBRK at **Appendix H.** Provision of a fourth signalised intersection approach to the Edinburgh Road/Smidmore Street intersection and separate vehicular access for delivery vehicles and employee parking.
	Increased traffic on local roads (Construction).	Adopt the recommendations of the Draft Construction Traffic and Pedestrian Management Plan prepared by CBRK at **Appendix H.**
	Additional demand for on-street car parking spaces (Operational and Construction).	Preparation of a Work Travel Plan as per the recommendations within the Transport, Traffic and Parking Assessment included at **Appendix H.**
Pedestrian management	Conflict with pedestrian and cycle/vehicle operations (Operational).	The proposal provides separate vehicular access for delivery vans and employees. Upgrades are also proposed to the pedestrian and cycleway along Sydney Steel Road to improve pedestrian and cyclist safety.

Item	Potential Impact	Mitigation Measure
	Conflict with pedestrian and cycle/vehicle operations (Construction).	Consistency with the Construction Traffic and Pedestrian Management Plan prepared by CBRK (**Appendix H**) and CMP prepared by Root Partnerships (**Appendix N**).
Biodiversity	Loss of biodiversity values as a result of the development.	A BDAR waiver (**Appendix O**) was issued by the NSW DPIE and OEH. It was determined that a BDAR is not required as part of this SSDA.
ESD / Environmental Performance	Irreversible increase in energy usage.	Adopt the recommendations of the Ecological Sustainable Development Report prepared by WSP included at **Appendix L.**
Solar Reflectivity	Adverse impact on reflectivity of the proposed buildings on public domain, pedestrians and motorists.	Maintain the proposed external materials and finishes and adhere to the recommendations within the Solar Reflectivity Assessment (**Appendix GG**) prepared by Windtech.
Air Quality and Odour	Air quality, odour and dust emissions (construction)	Implementation of the mitigation measures contained within the Air Quality and Odour Assessment prepared by Northstar Air Quality at **Appendix BB.**
Noise and Vibration	Adverse noise and vibration impact upon neighbouring sensitive receivers during operation.	Implementation of the mitigation measures contained within the Acoustic Report prepared by Acoustic Logic and included at **Appendix Z.**
	Adverse noise and vibration impact during construction	Implementation of the mitigation measures contained within the Preliminary Construction Noise and Vibration Plan prepared by Acoustic Logic at **Appendix HH** including: ▪ Community consultation and notification; ▪ Respite periods; ▪ Vibration monitoring; ▪ Quiet work methods; ▪ Complaints handling; ▪ Site induction.
Flooding	Site inundation during flood events and stormwater system capacity.	Implementation of the mitigation measures within the Flood Management Plan prepared by Richmond + Ross included at **Appendix W** including: ▪ Flood flow diversion channels and detention chambers; and,

Item	Potential Impact	Mitigation Measure
		▪ Flood proofing of habitable areas along the flood front to 300mm above the finished floor level (Floor level being 4.86mAHD).
Stormwater Quality	Adverse impact on the quality of stormwater runoff (Operation).	Implementation of the Stormwater Management Strategy prepared by Richmond + Ross included at **Appendix AA.**
	Adverse impact on the quality of stormwater runoff (Construction).	Implementation of the Stormwater Management Strategy prepared by Richmond + Ross included at **Appendix AA.**
Waste Management	Waste production (Operation).	Implementation of the Waste Management Plan prepared by Land and Groundwater Consulting at **Appendix M.**
	Waste production (Construction).	Implementation of the Waste Management Plan prepared by Land and Groundwater Consulting at **Appendix M.**
Hazardous Materials	Exposure to hazardous materials.	The results of the SEPP 33 assessment indicate the threshold quantities for the dangerous goods to be stored and transported are not exceeded and therefore SEPP 33 does not apply to the proposed development. As the facility is not classified as potentially hazardous, it is not necessary to prepare a Preliminary Hazard Analysis for the facility as SEPP 33 does not apply.
Airspace	Impact on prescribed and protected airspace	Maintain proposed height and building envelope in accordance with the Architectural Plans included at **Appendix C.**
Contamination	Health and ecological impacts risks from presence of contaminants.	Implementation of the recommendations within the Stage 2 Site Investigation Report prepared by JK Environments at **Appendix R** including: ▪ Complete a Hazardous Building Materials Assessment (Hazmat) for the existing structures at the Site; ▪ Prepare and implement an Asbestos Management Plan for soil disturbance in the vicinity of BH117; ▪ Prepare and implement an Unexpected Finds Protocol for the development works; and

Item	Potential Impact	Mitigation Measure
		▪ Prepare and implement an ASS Management Plan for the proposed development. The following should also implemented in the event of an unexpected find: ▪ All work in the immediate vicinity should cease and temporary barricades should be erected to isolate the area; ▪ A suitably qualified contaminated land consultant should be engaged to inspect the find and provide advice on the appropriate course of action. In the event that the unexpected find triggers remediation, the requirements of SEPP 55 must be addressed (e.g. notifications to Council); and ▪ Any actions should be implemented and validated to demonstrate that there are no unacceptable risks to the receptors.
		Implementation of the recommendations within the Site Audit Statement at **Appendix KK.** ▪ Preparation of a remedial action plan (**RAP**) in accordance with the NSW EPA (2020) *Consultants reporting on contaminated Land: Contaminated land guidelines.* The RAP should be reviewed by a NSW EPA Accredited Site Auditor. ▪ Preparation of a final site validation report by a qualified environmental consultant documenting the works undertaken in accordance with the RAP and certifying the suitability of the site for the proposed development. ▪ Preparation of an Environmental Management Plan (**EMP**) for the management of any contamination remaining on site following redevelopment that presents a risk to human health or the environment. ▪ Preparation of a Section A Site Audit Statement by a NSW EPA Accredited Site Auditor reviewing the above information and confirming the suitability of the site for the intended use. ▪ Any future use of groundwater would require appropriate regulatory approvals from the NSW Office of Water.

Item	Potential Impact	Mitigation Measure
Construction	Impacts associated with public safety, visual amenity, noise, waste and traffic management in the locality during construction.	Implementation of the mitigation measures contained within the Draft Construction Management Plan prepared by Root Partnerships (**Appendix N**) and Preliminary Construction Noise Management Plan prepared by Acoustic Logic (**Appendix HH**). Preparation of a detailed construction traffic management plan upon appointment of the building contractor.
Infrastructure provision	Adequate connection to infrastructure and utilities and adequate infrastructure capacity.	Maintain ongoing discussions with Sydney Water to facilitate a satisfactory engineered solution regarding the Sydney Water easement and channel. As per **Appendix T**, if the stormwater easement cannot be retained in its current location, relocating the existing stormwater system to allow construction of the proposed building is a satisfactory mitigation measure.
Building Standards	Adequate access for people with a disability.	Ensure adherence to BCA, accessibility objectives under the BCA, Disability (Access to Premises – Buildings) Standards 2010 (Premises Standards), and the relevant Australian Standards as they relate to access to premises and the intent of the Disability Discrimination Act 1992 (Cth) (DDA) as outlined in the BCA Assessment at **Appendix Y** and Access Report at **Appendix Z.** Continue to work with MGAC as the scheme progresses to ensure appropriate outcomes are achieved in building design and external domain design.
	Adherence to Building Code of Australia	
Crime and Safety	Adverse impact on the safety and security of local community.	Detailed design to include compliance with mitigation measures and recommendations contained within the Social and Economic Assessment prepared by HillPDA (**Appendix K**) and CPTED Assessment prepared by WPS at **Appendix II.** These include: ▪ Incorporate Crime Prevention Through Environmental Design (CPTED) principles into the proposal to hinder anti-social behaviour on Site.
	Antisocial and criminal behaviour.	

Item	Potential Impact	Mitigation Measure
		▪ Prepare a Construction Management Plan prior to commencement of works with appropriate detailed mitigation measures. ▪ Limit vehicle movements between 11pm and 6am and manage accordingly with neighbouring properties. ▪ Provide on-site parking for employees to reduce potential stress on public transport network.
Cumulative	Cumulative impacts (traffic, noise, dust, etc.) associated with construction and other development in the area.	Implementation and finalisation of the Draft Construction Pedestrian and Traffic Management Plan (**Appendix H**) and the Construction Environmental Management Plan prepared by Root Partnerships (**Appendix N**).

10. EVALUATION AND CONCLUSION

This EIS has been prepared to accompany a SSDA for the construction of a warehouse and distribution facility and associated offices at 74 Edinburgh Road, Marrickville. This EIS has comprehensively addressed the general and key issues relating to the proposed development and has included the plan and document requirements identified in the SEARs. This EIS is submitted to the NSW DPIE pursuant to Part 4 of the EP&A Act. The Minister for Planning, or their delegate, is the consent authority for the detailed SSD DA.

Overall, the proposed development sought within the detailed SSD DA is considered appropriate for the Site and warrants approval from the Minister for Planning for the following reasons:

- The proposal contributes to the achievement of the objectives for development within the Eastern City District as outlined within the relevant strategic plans and policies.
- The proposal results in an orderly and economic use of the land that leverages significant NSW Government investment in public transport to the Site, specifically the new Sydenham Metro Station.
- The proposal supports 30,732sqm of industrial GFA and 8,361m² of commercial GFA which is capable of contributing to the employment targets of the Eastern City District by delivering 660 operational jobs and 361 direct construction jobs.
- The proposal satisfies the applicable State planning policies and relevant environmental planning instruments that apply to the site.
- The proposed warehouse use is permitted with consent. While 'office premises' are not permissible in the IN1 General Industrial Zone, consent is sought for this component in accordance with Clause 4.38 (3) of the EP&A Act.
- The proposal will not have any unacceptable environmental impacts, as follows:
  - The proposal presents an appropriate built form in an industrial zoned area.
  - The proposal has no unacceptable traffic impacts.
  - The proposal minimises pedestrian and vehicle conflicts.
  - The proposal is sympathetic to nearby sensitive residential receivers and heritage items.
  - The proposal respects the industrial history and character of the place and will not obstruct or impact the vicinity heritage items in any way.
  - The proposal will have minimal visual impact from key locations in the public domain.
  - The proposal is consistent with the surrounding character and has a positive visual impact due to its site coverage, generous setbacks, location of car parking, high quality landscaping along public roads, façade design, building articulation and high-quality materials.
  - The proposal will not cause additional overshadowing to sensitive residential receivers or public domain areas.
  - The proposal is unlikely to have a significant impact on biodiversity values.
  - The proposal is unlikely to cause adverse solar glare to motorists, train drivers, pilots, pedestrians, and occupants of adjoining buildings.
  - The proposal is capable to not give rise to significant air quality and odour impacts during the construction and operational phases of the development.
  - Subject to adhering to the proposed mitigation measures, the proposal will have an acceptable noise impact during construction and operation.
  - The proposed development will have no significant impact on current flood volumes, flood depths and existing flood hazard categories up to the 1% AEP storm event.
  - The proposal is not classified as potentially hazardous and the Site can be made suitable for the proposed development.

– The proposal satisfies the SEARs as demonstrated in this EIS and accompanying specialist reports.

In view of the above, it is submitted that the proposal is in the public interest and should be approved subject to appropriate consent conditions.

DISCLAIMER

This report is dated 19 October 2020 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd **(Urbis)** opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of WOOLWORTHS **(Instructing Party)** for the purpose of State Significant Development Application **(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.

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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.