42 RAYMOND AVENUE, MATRAVILLE

Environmental Impact Statement

Prepared for
HALE CAPITAL PARTNERS
11 March 2022

URBIS

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

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We acknowledge, in each of our offices, the Traditional Owners on whose land we stand.

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SIGNED DECLARATION

Project details		
Project name	42 Raymond Avenue, Matraville	
Application number	SSD-31552370	
Address of the land in respect of which the development application is made	42-52 Raymond Avenue & 44A McCauley Street, Matraville	
Applicant details		
Applicant name	Hale Capital Partners Pty Ltd	
Applicant address	Level 13, 333 George Street, Sydney NSW 2000	
Details of people by whom this EIS was prepared		
Names and professional qualifications	Jennifer Cooper Bachelor Town Planning (Hons) (UNSW)	Holly Rhoades Master of Spatial Planning (UCL)
Address	Level 8, Angel Place, 123 Pitt Street, Sydney NSW 2000	

Declaration

The undersigned declares that this EIS:

- has been prepared in accordance with Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*;
- contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates;
- does not contain information that is false or misleading;
- addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project;
- identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments;
- has been prepared having regard to the Department's *State Significant Development Guidelines – Preparing an Environmental Impact Statement*;
- contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development;
- contains a consolidated description of the project in a single chapter of the EIS;
- contains an accurate summary of the findings of any community engagement; and
- contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.

Signatures	 Jennifer Cooper, Director	 Holly Rhoades, Senior Consultant
Date	11 March 2022	

GLOSSARY AND ABBREVIATIONS

Reference	Description
ACHAR	Aboriginal Cultural Heritage Assessment Report
AMR	Autonomous Mobile Robots
AQIA	Air Quality Impact Assessment
ARI	Average Recurrence Interval
BAM	Biodiversity Assessment Method
BC Act	*Biodiversity Conservation Act 2016*
BC Reg	*Biodiversity Conservation Regulation 2017*
BDAR	Biodiversity Development Assessment Report
CEEC	Critically Endangered Ecological Community
CDA	Concept Development Application
CEMP	Construction Environmental Management Plan
CMP	Construction Management Plan
CTMP	Construction Traffic Environmental Plan
DCP	Development Control Plan
DPE	NSW Department of Planning and Environment
EP&A Act	*Environmental Planning and Assessment Act 1979*
EPA Regulation	*Environmental Planning and Assessment Regulation 2000*
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999*
EIS	Environmental Impact Statement
EPA	NSW Environment Protection Authority
HIPAP	Hazardous Industry Planning Advisory Paper
LEP	Local Environmental Plan
MNES	Matters of National Environmental Significance
NCC	National Construction Code
NRAR	Natural Resource Access Regulator
OEMP	Operational Environmental Management Plan

Reference	Description
PBP	Planning for Bushfire Protection
PCT	Plant Community Type
POM	Plan of Management
PSI	Preliminary Site Investigation
SAII	Serious and Irreversible Impacts
SARs	Commonwealth Supplementary Assessment Requirements
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
Site	42-52 Raymond Avenue & 44A McCauley Street, Matraville Lot 1 in DP 369888, Lot 32 Section B DP 8313, Lot 1 DP 511092 & Lot 2 in DP 1082623
SRD SEPP	*State Environmental Planning Policy (State and Regional Development) 2009*
SSD	State Significant Development
SSDA	State Significant Development Application
TIA	Traffic Impact Assessment
UXO	Unexploded Ordnance
VIS	Vegetation Integrity Score
WMP	Waste Management Plan
WSUD	Water Sensitive Urban Design
WWTP	Wastewater Treatment Plant

SUMMARY

This Environmental Impact Statement (**EIS**) has been prepared on behalf of Hale Capital Partners Pty Ltd (**Hale Capital**) in support of a State Significant Development Application (**SSDA**) for the site at 42 Raymond Avenue, Matraville.

Hale Capital has identified an opportunity to redevelop a vacant industrial site to provide an innovative warehouse and distribution centre. Specifically, the intended outcomes of the project are to:

- Provide for the highest and best use of the site through the development of a brownfield site to deliver sustainable development.
- Provide a modern multi-level warehouse and distribution centre, strategically located to Sydney Airport, Port Botany, the regional road network and the local Sydney area.
- Deliver 186 jobs through the construction phase and up to 210 jobs once operational.
- Develop a high-quality design that takes into consideration the surrounding site context and neighbouring uses to deliver an improved urban outcome for the site.
- Integrate landscaping and tree planting to ensure a high standard of architectural, urban and landscape design is provided on site.
- Minimise disruption to surrounding residents and businesses during the construction phase.

The proposal is for the purposes of warehouse or distribution centre with a capital investment value of $37,503,252. Accordingly, it is classified as a State Significant Development (**SSD**) under Clause 12, Schedule 1 of the State Environmental Planning Policy (State and Regional Development) 2011.

An aerial photograph of the site is provided at **Figure 1**.

Figure 1 Aerial photograph

Source: Urbis

Feasible Alternatives

Various project alternatives were considered for the proposed warehouse and distribution centre.

A ‘do nothing’ approach would fail to deliver the sustainable development of the site to provide up to 396 jobs through the construction and operation phases.

Alterative locations were also considered by Hale Capital for the warehouse and distribution centre. These options were not considered to be the preferred option for the proposed development as they were not as strategically located to Sydney Airport, Port Botany and the regional and local road networks as the preferred location.

Other sites considered were not as well located within the prominent industrial precinct of south Sydney and did not also allow for a satisfactory site layout and design to allow for the proposed operation of the warehouse and distribution centre.

The Proposal

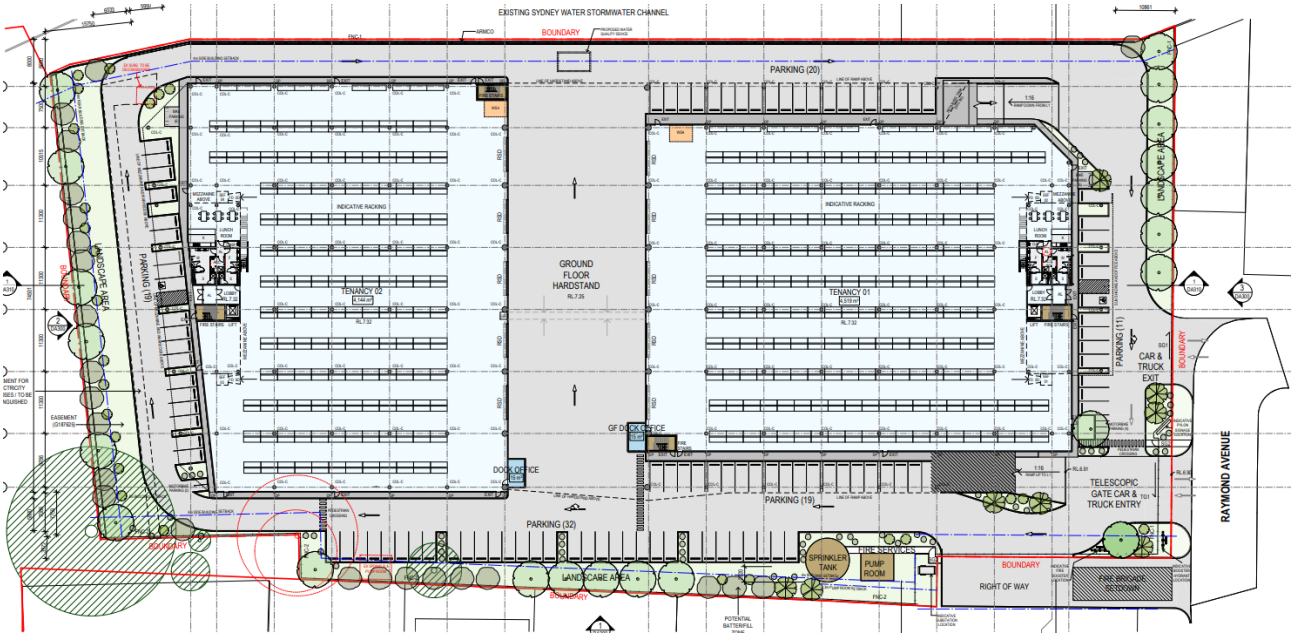
The proposal will deliver an innovative multi-level warehouse and distribution facility of a high-quality design that respects and contributes to the local context. The proposal will optimise the use of a vacant industrial site within an established industrial precinct to deliver a variety of employment opportunities on site, whilst minimising any potential impacts on local amenity. The proposed development involves:

- Construction, fit out and operation of a two-storey warehouse and distribution centre comprising approximately 19,460m^2 GFA.
- Provision of 11 bicycle parking spaces, 6 motorcycle parking spaces and 101 car parking spaces at ground floor level.
- Approximately 2,250m^2 of hard and soft landscaping across the site.
- Provision of one additional access crossover from Raymond Avenue.
- Provision of 1.8m metal palisade perimeter fencing.
- Earthworks and upgrades to existing on-site infrastructure.
- Provision of internal vehicle access route and loading docks.
- Building identification signage.
- Operation 24 hours per day seven days per week.

The site was identified as being the most suitable location to deliver the project objectives.

The proposal will be undertaken in accordance with the Architectural Plans prepared by SBA Architects at **Appendix B**. The proposed site plan is provided at **Figure 2**.

Figure 2 Proposed site plan



Source: SBA Architects

Consultation

Community and stakeholder engagement has been undertaken by Urbis and the project team in the preparation of the SSDA. This includes direct engagement and consultation with:

- Adjoining landowners and occupants.
- Government, agency and utility stakeholders.

The outcomes of the community and stakeholder engagement have been incorporated into the proposed design for the warehouse and distribution centre and are discussed in detail at **Section 5** of this EIS.

Justification of the Project

This EIS assesses the proposed development in accordance with relevant planning instruments and policies. It also outlines the mitigation measures proposed to avoid unreasonable or adverse environmental effects arising from the proposal. Additionally, the proposed development satisfies the Secretary's Environmental Assessment Requirements (SEARs) issued for the project.

The key issues for all components of the project identified in the SEARs have been assessed in detail, with specialist reports underpinning the key findings and recommendations identified in the Assessment of Impacts in **Section 6**. It has been demonstrated that for each of the likely impacts identified in the assessment of the key issues, the impact will either be positive or can be appropriately mitigated to avoid unacceptable impacts.

The proposal represents a positive development outcome for the site and surrounding area for the following reasons:

- **The proposal is consistent with state and local strategic planning policies:**

  The proposal is consistent with the relevant goals and strategies contained in:

  – *Greater Sydney Region Plan: A Metropolis of Three Cities*
  – *Our Greater Sydney 2056: Eastern City District Plan*
  – *Randwick City Council Local Strategic Planning Statement*
  – *Future Transport Strategy 2056*
  – *Better Placed*

- **The proposal satisfies the applicable local and state development controls:**

  The proposal is permissible with consent and meets the relevant statutory requirements of the relevant environmental planning instruments, including

  – *State Environmental Planning Policy (State and Regional Development) 2011*

  – *State Environmental Planning Policy (Infrastructure) 2007*

  – *State Environmental Planning Policy (Three Ports) 2013*

  – *State Environmental Planning Policy No. 55 – Remediation of Land*

  – *State Environmental Planning Policy No 64 – Advertising and Signage*.

- **The design responds appropriately to the opportunities and constraints presented by the site:**

  – The design of the proposal responds to the site context whilst seeking to deliver an attractive, modern warehouse and distribution facility. The design has taken into consideration the site qualities as well as neighbouring land uses and built forms.

  – The built form responds to both the functional and spatial requirements of delivering a modern warehouse and distribution centre, and the industrial character of the local area.

  – The proposal delivers a built form, façade treatment and materiality that enhances the quality of the site as well as the provision of increased landscaping and an improved streetscape.

  – The design includes vehicular access from Raymond Avenue with a one-way circular vehicular route through the site and enables the separation of heavy vehicle and car and pedestrian movements.

- **The proposal is highly suitable for the site:**

  – The warehouse and distribution centre use in permissible within the IN1 zone. It also satisfactorily responds to the zone objectives, providing for warehouse land uses, encouraging employment opportunities and minimising potential adverse effects on other land uses.

  – The development complies with the Three Ports SEPP, as well as the RDCP 2012 including acoustic amenity, built form and setbacks, car parking and landscaping.

  – The site is located within an existing industrial area and the character and scale of the development is compatible with the site context.

  – The site is highly accessible to both the transport and regional freight network and optimises use of a brownfield site to deliver sustainable development.

- **The proposal is in the public interest:**

  – The proposal is consistent with relevant State and local strategic plans and complies with the relevant State and local planning controls.

  – No adverse environmental, social or economic impacts will result from the proposal.

  – The proposal will provide up to 186 jobs during the construction phase, and up to 210 jobs once complete and fully operational. The proposal will stimulate local investment and contribute significant economic output and value add to the economy each year. This project is fully funded and ‘shovel ready’ for commencement of construction as soon as possible this year.

  – Subject to implementation of the recommended mitigation measures, no adverse, social or economic impacts will result from the proposal in terms of traffic, noise and vibration, air quality and odour or views during construction and ongoing operation of the facility. Based on the assessment of noise, air quality and traffic, the proposal will not result in any adverse cumulative impacts.

  – The issues identified during the community and stakeholder engagement have been addressed through the assessment of the impacts of the modified project.

In view of the above, it is considered that this SSD Application has significant merit and should be approved subject to the implementation of the mitigation measures described in this report and supporting documents.

1. INTRODUCTION

This section of the report identifies the applicant for the project and describes the site and proposed development. It outlines the site history and feasible alternatives explored in the development of the proposed concept, including key strategies to avoid or minimise potential impacts.

1.1. APPLICANT DETAILS

The applicant details for the proposed development are identified Table 1.

Table 1 Applicant details

Descriptor	Proponent Details
Full Name(s)	Hale Capital Partners Pty Ltd
Postal Address	Level 13, 333 George Street, Sydney NSW 2000
ABN	17 648 187 811
Nominated Contact	Alana Garrick, Development Manager

1.2. PROJECT DESCRIPTION

This EIS is submitted to the Department of Planning and Environment (**DPE**) on behalf of Hale Capital and in support of an application for SSD-31552370 at 42 Raymond Avenue, Matraville.

The SSDA seeks consent for:

- Construction, fit out and operation of a two-storey warehouse and distribution centre comprising approximately 19,460m^2 GFA including:
  - 17,789m^2 of warehouse and distribution GFA; and
  - 1,671m^2 GFA of ancillary office space.
- Provision of 11 bicycle parking spaces, 6 motorcycle parking spaces and 101 car parking spaces at ground level.
- Approximately 2,250m^2 of hard and soft landscaping at ground level.
- Provision of one additional access crossover from Raymond Avenue.
- Provision of internal vehicle access routes, two-level central breezeway and loading docks.
- Provision of 1.8m metal palisade perimeter fencing.
- Site preparation including minor bulk earthworks.
- Upgrades to existing on-site infrastructure.
- Building identification signage.
- Operation 24 hours per day seven days per week.

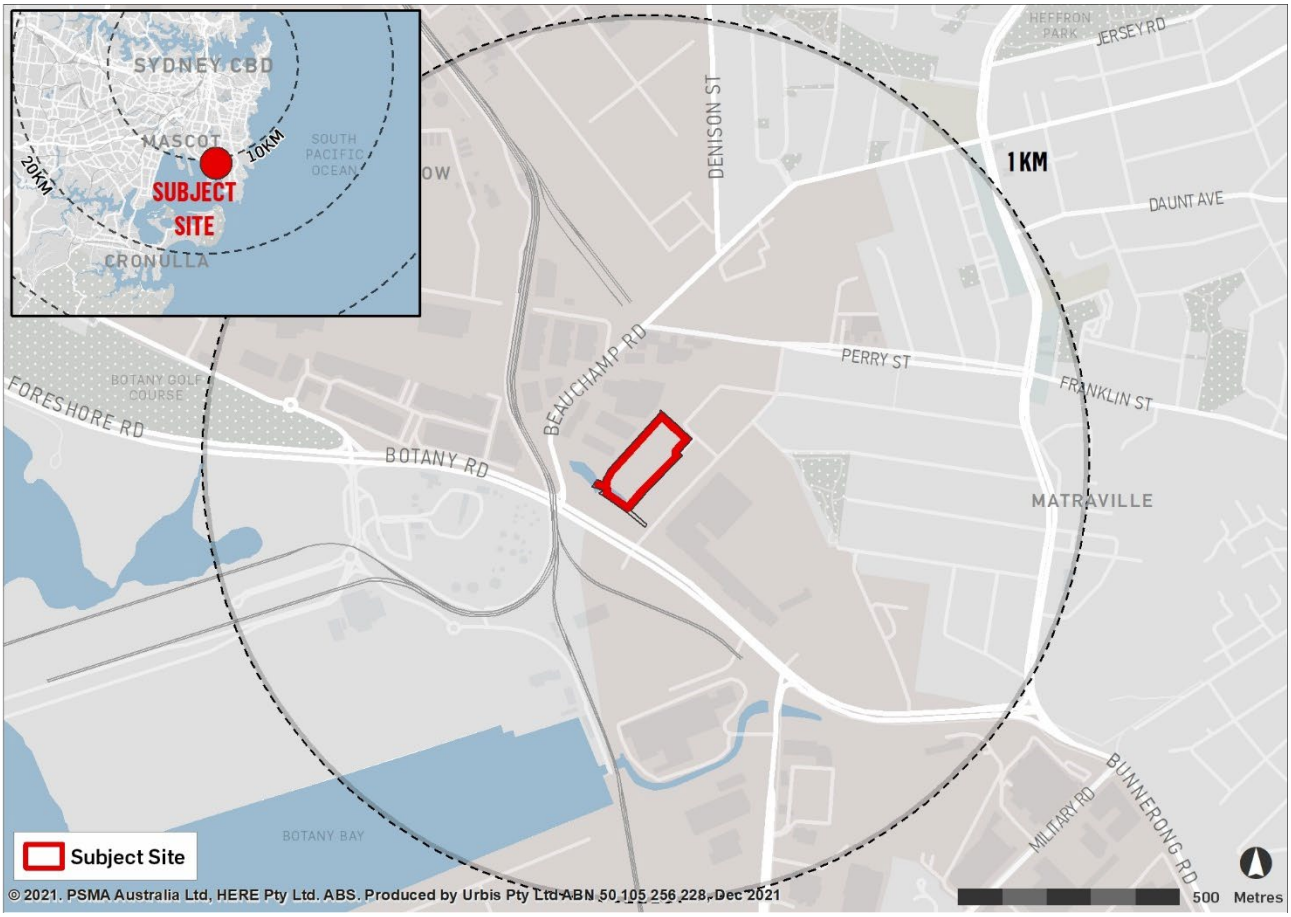
The key objectives for the proposed development and the way in which these have been achieved are summarised in **Table 2**.

Table 2 Project objectives

Project Objective	Proposed Development
Deliver a modern multi-level warehouse and distribution centre in a strategic location.	The proposal seeks to deliver a modern warehouse and distribution facility strategically located within the Port Botany precinct, well-connected to the regional road network, Sydney Airport and Port Botany.
Provide for the highest and best use through the sustainable development of a vacant brownfield site.	The proposal is for a warehouse and distribution centre use which is permissible within the IN1 zoning for the site. The existing site is vacant and does not currently contribute to providing local employment opportunities. The proposal will make best use of the site through sustainable redevelopment of an existing industrial site to deliver increased, long-term employment opportunities.
Deliver up to 186 jobs through the construction phase and up to 210 jobs once operational.	The proposal will enable the delivery of 186 construction and up to 210 operational jobs on site to provide a range of local employment opportunities.
Provide a high-quality design that responds to the local site context and enhances the streetscape.	The design of the proposal has been carefully considered to respond to the local site context and enhance the qualities of the site and local character. The design of the proposal has taken into consideration neighbouring uses as well as providing improvements to the streetscape.
Integrate landscaping and tree planting to ensure a high standard of architectural, urban and landscape design.	Landscaping and tree planting has been integrated into the proposal across the site. Planting has been considered to enhance the site in relation to the public domain, the appearance of the building and for the amenity of employees.
Minimise disruption to existing residents and businesses within the surrounding area during the construction phase	Where required, mitigation and management measures will be implemented during the construction phase to minimise any impacts on neighbouring businesses and residents.

A map of the site in its regional setting is provided as **Map 1**.

Map 1 Regional context



Source: Urbis

1.3. PROJECT BACKGROUND

1.3.1. Relevant History

The site has been used for industrial purposes for approximately 65 years. The previous warehouse was constructed in 1955 and remained on site until its demolition in 2020. Following the demolition of the original warehouse, remediation of the site was undertaken (see **Section 6**). Recent planning history at the site primarily relates to the varying uses of the warehouse over time and additions/alterations in relation to the warehouse/industrial use.

Hale Capital purchased the site as a unique opportunity to deliver an innovative multi-level industrial development, strategically located within the prominent industrial precinct of south Sydney. The site was chosen due to its proximity to Port Botany and Sydney Airport, and connection to the M1 Motorway via Botany Road. The site presents a rare opportunity to develop a multi-level warehouse and distribution facility in a land constrained market with limited supply.

1.4. RELATED DEVELOPMENT

The site contains an existing substation at the western corner, to which a Sydney City Council easement exists for access. As part of the development, it is proposed to remove this substation and extinguish the easement. Two new replacement substations are proposed to Raymond Avenue in the eastern part of the site.

1.5. RESTRICTIONS AND COVENANTS

The site at 42 Raymond Avenue has a number of covenants along the eastern, southern and western boundaries of the site, primarily in relation to services and infrastructure.

2. STRATEGIC CONTEXT

This section of the EIS describes the way in which the proposal addresses the strategic planning policies relevant to the site. It identifies the key strategic issues relevant to the assessment and evaluation of the project, each of which are addressed in further detail in **Section 7** of this EIS.

2.1. PROJECT JUSTIFICATION

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

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

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

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

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

  The proposal will deliver increased job opportunities within the Port Botany area which forms part of the Eastern Economic Corridor. The proposal is strategically located with its proximity to Port Botany and Sydney Airport, and it will help support the growth of these areas as national significant trade gateways.

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

  The proposal will provide additional floor space to assist with the growth of the freight and logistics network. The site is strategically located due to its proximity to Port Botany and Sydney Airport which are both key parts of Sydney's freight and logistics network.

- *Objective 21: Internationally competitive health, education, research and innovation precincts*

  The proposal will deliver an innovative two-storey warehouse and distribution centre that maximises the use of the site in an existing industrial precinct. This will help support Port Botany and Sydney Airport that have been identified as two nationally significant trade gateways.

- *Objective 22: Investment and business activity in centres*

  The proposal will deliver investment and provide additional business activity into Port Botany which is a key trade gateway for NSW. The proposal is also located close to Sydney Airport and the proposal will provide additional investment and growth in this area

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

  The proposal will deliver an additional 19,460m^2 of industrial floor space, which will support the retention and management of industrial areas within Greater Sydney. It will also generate up to an additional 210 direct jobs during operation.

2.1.2. Our Greater Sydney 2056: Eastern City District Plan

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

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

The planning priorities and actions relevant to the proposed development are listed and discussed below:

- *Planning Priority E9: Growing international trade gateways*

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

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

  The proposal is strategically located in Port Botany and close to Sydney Airport which are two key trade gateways in NSW. The proposal will deliver greater investment and provide additional business opportunities with up to an additional 210 operational jobs to support the growth of these key trade gateways of NSW.

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

  The proposal will deliver an additional 19,460m^2 of industrial floor space, which will support the retention and management of industrial areas within Greater Sydney. It will also generate up to an additional 210 direct jobs during operation.

- *Planning Priority E13: Supporting growth of targeted industry sectors*

  The proposal will support the growth of technological innovation in the freight and logistics industry by providing an innovative solution to maximising the efficient use of space available for warehousing and distribution.

2.1.3. Randwick City Local Strategic Planning Statement

The Randwick City Local Strategic Planning Statement (LSPS) Vision 2040 provides the framework and vision for land use planning over a 20-year period in Randwick LGA.

The LSPS accords with the Region Plan and District Plan with Planning Priority 13 which states "*Recognise the importance of industrial and urban services land".* The proposal supports the importance of retaining and protecting industrial zoned land for industrial manufacturing and warehousing uses and urban services by providing 19,460m^2 high-quality, modern industrial floorspace on a currently vacant industrial site.

The proposal will also provide up to an additional 210 direct jobs once operational which will support the continued growth of Port Botany as a key trade gateway for Sydney and NSW.

2.1.4. Better Placed

In August 2017, the Government Architect for NSW (GANSW) released *Better Placed*, the integrated design policy for NSW. *Better Placed* seeks to establish priorities and objectives that shape design to create well-designed built environments.

It presents a collection of priorities and objectives that aspire to shape design that addresses key challenges and directions and creates good design outcomes for NSW. The proposed development is consistent with the objectives given it will:

- Be readily absorbed into the industrial context and character of the surrounding area (Objective 1).
- Incorporate sustainability measures to improve the environmental performance of the building (Objective 2).
- Capable of complying with relevant accessibility provisions to ensure equitable access (Objective 3).
- Fit for purpose in response to engineering and logistical requirements (Objective 5).
- Contribute significant economic output and value add to the economy each year (Objective 6).
- Incorporate architectural treatments and screen planting to soften views towards the development (Objective 7)

By adopting the objectives of the *Better Placed* policy, development responds to the key challenges and directions for NSW.

2.2. KEY FEATURES OF SITE AND SURROUNDS

The site is located at 42-52 Raymond Avenue and 44A McCauley Street, Matraville and within the Randwick Local Government Area (LGA). The site is legally described as Lot 1 in DP 369668, Lot 32 Sec B in DP 8313, Lot 1 in DP 511092 and Lot 2 in DP 1082623.

Lot 1 in DP 369668, Lot 32 Sec B in DP 8313, Lot 1 in DP 511092 comprises the developable site area, accommodating the proposed warehouse and distribution centre. Lot 2 in DP 1082623 has been included as it is proposed to remove an existing tree accommodated within this lot to facilitate the development of the adjoining land. The boundary between the developable land and Lot 2 is denoted by a dashed red line in **Map 2** below. In the following sections of the report, 'the site' refers to the developable area (excluding Lot 2), unless otherwise specified, including regarding the proposed tree removal.

The site previously contained a warehouse building which has been recently cleared and is now vacant hardstand. The site is approximately 1.94 hectares in area and has two mature trees at the south-eastern corner. A Sydney Water stormwater drainage channel runs along the north-western boundary of the site. A detention basin associated with the Opal Paper Mill at 1891 Botany Road is located to the south of the site.

The location of the site is illustrated in **Map 2**. Photographs of the current site condition are provided in **Figure 3**.

Map 2 Local context

Source: Urbis

Figure 3 Site photographs

Picture 1 View of the site from Raymond Avenue

Picture 2 View of the site from south-east corner

Picture 3 View of the eastern boundary

Picture 4 View of the northern boundary

Source: Hale Capital

The key features of the site which have the potential to impact or be impacted by the proposed development are summarised in the table below.

Table 3 Key features of site and locality

Descriptor	Site Details
Land Configuration	▪ Site area: 1.944 hectares ▪ Site dimensions: 103 metres x 195 metres (approximate) ▪ Site topography: the site is generally flat
Land Ownership	Lot 1 in DP 369668, Lot 32 Sec B in DP 8313 & Lot 1 in DP 511092 are owned by Perpetual Corporate Trust Limited ATF 42 Matraville Investment Trust Lot 2 in DP 1082623 (which includes only tree removal) is owned by Opal Packaging Australia Pty Ltd

Descriptor	Site Details
Existing Development	The site previously contained a warehouse building that was demolished in 2020 and is now vacant hardstand. A detention basin is located to the south of the site.
Local Context	The site is surrounded by a mix of warehouse/distribution and industrial uses. The surrounding warehouse developments vary from older stock to more recent developments. There is also a variety in lot sizes with some small business units and some larger warehouse sites. The surrounding locality is described below: ▪ **North-East**: Existing warehouse development including units along Raymond Avenue and Beauchamp Road. ▪ **South-East**: Existing warehouse and general industrial uses along Raymond Avenue and McCauley Street including the Opal Paper Mill. The residential community of Matraville is located approximately 170 metres to the east of the site comprising low rise residential development ▪ **South-West**: Immediately to the south of the site is a stormwater detention basin beyond which is existing warehouse development and Botany Road. Port Botany is located to the south of the site beyond Botany Road. ▪ **North-West**: A Sydney Water heritage listed stormwater drainage channel runs along the western boundary of the site. To the west of the site is existing warehouse and industrial uses.
Regional Context	The site is located approximately 9 kilometres south of the Sydney Central Business District (CBD), 4.5 kilometres south-east of Sydney Airport and 500 metres north of Port Botany. The site is located approximately 1.6 kilometres south of the Eastgardens-Maroubra Junction Strategic Centre.
Infrastructure	The site is strategically located close to the Port Botany trade gateway with vehicular access to Botany Road via McCauley Street. The site is also strategically located to Sydney Airport with vehicular access via Foreshore Road. The site is highly accessible to the M1 being approximately 5 kilometres from the M1 route, as well as the M5 and M8 interchange approximately 8 kilometres to the north-west of the site.
Site Access	The site is accessed from Raymond Avenue. The site has an approximate 50 metre frontage to Raymond Avenue with two existing vehicle crossovers.
Easements and Covenants	There are covenants along the eastern, southern and western boundaries of the site, primarily in relation to services and infrastructure.

Descriptor	Site Details
Services	The site is served by existing services connections for power, water, gas and telecoms.
Acid Sulfate Soils	The site has a low probability of occurrence of acid sulfate soil risk.
Contamination	Phase 2 contamination remediation works have been carried out on site in accordance with the Remediation Action Plan and Remediation Validation Report (see **Section 6** and **Appendices V** & **Y**).
Stormwater and Flooding	The site is not affected by mainstream flooding associated with the Sydney Water drainage channel in the 1% AEP flood event. A minor overland flow path exists on the north of the site which conveys overland flow from Raymond Avenue to the drainage channel.
Bushfire Prone Land	The site is not bushfire prone land.
Flora and Fauna	Two Hills Weeping Fig trees are located at the south-eastern corner of the site. Other vegetation comprises weed growth along the boundary to the stormwater channel.
Aboriginal Heritage	A draft Aboriginal Cultural Heritage Assessment has been undertaken which finds that no Aboriginal objects or Aboriginal places are registered within the site. It concludes that, due to the high level of historical ground disturbance, there is nil to low potential for Aboriginal sites within the disturbed soil layers to depths of approximately 0.8m below the existing ground surface.
European Heritage	The site is not a listed heritage item. The north-western boundary of the site adjoins the Bunnerong Stormwater Channel No. 11 which is identified as a heritage item on Sydney Water's Section 170 Heritage & Conservation Register (Item 4570016). The site is not located within the vicinity of any heritage items listed on an Environmental Planning Instrument or the NSW State Heritage Register, or located within a conservation area.

Figure 4 Locality photographs

Picture 1 Business / industrial units to the north-east of the site on Raymond Avenue

Source: Google Maps, September 2021

Picture 2 View of Raymond Avenue looking north

Source: Google maps, November 2021

Picture 3 View of Raymond Avenue looking south

Picture 4 Large format warehousing to the east of the site McCauley Street

Source: Google Maps, September 2021

2.3. CUMULATIVE IMPACTS WITH FUTURE PROJECTS

The site is located within the Port Botany precinct. Matraville is an established industrial area and contains a range of industrial and manufacturing uses. Approved and likely future developments which may be relevant in the cumulative impact assessment of the proposal are summarised in the following table.

Table 4 Approved and Likely Future Developments

DA Reference	Development Description	Current Status
SSD-9691	Staged construction of the Orica Southlands Warehouse Estate, comprising: ▪ construction of a suspended concrete platform above the existing flood detention basin; ▪ construction and operation of two warehouse buildings with a combined gross floor area of 21,780m^2; ▪ associated landscaping, hardstand areas, stormwater and other on-site infrastructure; and ▪ subdivision of the site into two lots.	Approved
DA-2020/417	Construction of an industrial warehouse estate with associated site offices, hardstand and parking areas; tree and vegetation removal; landscaping works; and signage, operating 24 hours / 7 days	Approved
DA35/98-Mod-5	Construction of Packaging Facility	Approved
MP05_0120-Mod-10	Modification to: ▪ construct and operate a rejects handling facility on site to minimise waste generation associate with the paper mill operations ▪ extend the finished product store to support the ongoing operation and operational efficiency.	Approved

DA Reference	Development Description	Current Status
SSD-10373	Construction and operation of a 'fit-for-purpose' Energy Recovery Plant (ERP) to produce steam and electricity for the Orora Recycled Paper Mill	Prepare EIS

The potential cumulative impacts of the project are addressed in **Section 6** of the EIS in accordance with the DPE *Assessing Cumulative Impacts* guidelines.

2.4. FEASIBLE ALTERNATIVES

Clause 7 in Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (**the Regulation**) requires an analysis of any feasible alternatives to the proposed development, including the consequences of not carrying out the development.

Hale Capital identified three project alternatives which were considered in respect to the identified need for the warehouse and distribution centre. Each of these options is listed and discussed in the following table.

Table 5 Project alternatives

Option	Assessment
Option 1 - Do Nothing	This option was dismissed as the objectives of the project would not be met. If the proposal was not to proceed, the site would remain vacant and not be developed for employment generating opportunities in accordance with the objectives of the IN1 General Industrial Zone.
Option 2 - Alternative Location	Consideration to alternative sites was given, however these locations were not considered to be the preferred option for the proposed development as they were not as strategically located to Sydney Airport, Port Botany and the regional and local road networks as the preferred location. Other sites considered were not as well located within the prominent industrial precinct of south Sydney and did not also allow for a satisfactory site layout and design to allow for the proposed operation of the warehouse and distribution centre. The alternative sites were dismissed as the subject site resulted in the most beneficial outcomes for the proposal and ensures that significant infrastructure investment results in employment opportunities as: ▪ it will be situated within a locality that is surrounded by industrial and employment generating uses; ▪ the site has appropriate proximity from sensitive land use activities including residential development; ▪ all potential environmental impacts of the proposal can be suitably mitigated within the site; ▪ the proximity to Port Botany, Sydney Airport and the regional road network provides increased economic benefits; ▪ the proposal will not affect any area of heritage or archaeological significance; and

Option	Assessment
	▪ the proposal can be developed with appropriate visual amenity given its surrounding context. The proposal is justified on the basis that it is compatible with the locality in which it is proposed while having no adverse economic, environmental or social impacts.
Option 3 - Alternative Design	Consideration to an alternative design was given in relation to seeking to avoid the removal of the Hills Weeping Fig tree on Lot 2 DP 1082623. This option was however dismissed as the alternative design did not allow for the project objectives to be delivered in relation to the construction of a state-of-the-art warehouse and distribution centre that meets the needs of modern warehouse and distribution uses now and into the future, as well as maximising the life cycle of the development. The alternative design was not considered to achieve highest and best use of the designated, vacant industrial site within the Port Botany industrial precinct.
Option 4 - The proposal (Preferred Option)	The site was identified as being the most suitable location for the proposed warehouse and distribution centre and presents the most strategically viable of the options for the following reasons: ▪ the proposal promotes the efficient use of a vacant brownfield site, which is capable of being developed and represents sustainable development; ▪ the site allows for the development as a permissible use, being located within an industrial / employment area and the proposed use is in accordance with the IN1 zoning of the site; ▪ the proposal will generate employment opportunities on a designated site in an industrial precinct, thus contributing to the growth of Sydney; ▪ the site is strategically located to Port Botany, Sydney Airport and the regional road network; ▪ the proposal is compatible with surrounding development and local context and will result in minimal impact on the environment, incorporating the implementation of suitable mitigation measures where required; and ▪ the proposal can be developed on site without having unacceptable environmental impacts including in relation to ecology, biodiversity, heritage, noise and views.

The proposal was identified as being the most suitable option as it allows for warehousing and distribution uses within in an established industrial precinct. The site design and layout of the built form maintains consistency with the objectives of the IN1 zone and will enhance the underlying industrial character intended for the locality. This will be achieved by the built form which responds to the industrial context of the land and is sensitive to the surrounding environment.

3. PROJECT DESCRIPTION

The following sections of the EIS summarise the key numeric components of the proposed development and describe the demolition, site preparation, construction and operational phases in further detail.

3.1. PROJECT OVERVIEW

The key components of the proposed development are summarised in **Table 6**. A copy of the architectural drawings is attached as **Appendix B**.

Table 6 Project details

Descriptor	Project Details
Project Area	Developable site area: 19,437m^2 Non-developable site area (Lot 2 DP 1082623): 3,337m^2
Site Description	Lot 1 in Deposited Plan 369668 Lot 32 Sec B Deposited Plan 8313 Lot 1 in Deposited Plan 511092 Lot 2 in Deposited Plan 1082623 (tree removal only)
Project Description	The project comprises the construction of a warehouse and distribution centre development to be operated on a 24 hour, seven day a week basis
Access	Access to and from the site shall occur via two access crossovers on Raymond Avenue, to be utilised by light and heavy vehicles. A third access crossover from Raymond Avenue provides emergency vehicle access to the sprinkler booster on site. The largest vehicle to access the site is expected to be a 26 metre B-double (subject to a separate application to the National Heavy Vehicle Register).
GFA	Total GFA of 19,460m^2, broken down as follows: ▪ Warehouse and distribution: 17,789m^2 ▪ Ancillary office: 1,671m^2 The GFA is distributed across the four tenancies as follows: ▪ Tenancy 1: Warehouse and distribution 4,583m^2 / Office 416m^2 ▪ Tenancy 2: Warehouse and distribution 4,206m^2 / Office 421m^2 ▪ Tenancy 3: Warehouse and distribution 4,537m^2 / Office 416m^2 ▪ Tenancy 4: Warehouse and distribution 4,463m^2 / Office 418m^2
Maximum Height	22.2 metres (RL 29.52)
Parking Spaces	On site parking will be provided for: ▪ 101 cars

Descriptor	Project Details
	▪ Heavy vehicle parking is provided within the ground floor and level one breezeways
Cycle & Motorcycle Parking	11 bicycle parking spaces and 6 motorcycle parking spaces
End of Trip Facilities	End of trip facilities are provided within each of the four ancillary office spaces comprising two change rooms (1x male & 1x female) containing one shower and 18 lockers.
Landscaped area	2,250m^2 of hard and soft landscaping at ground level
Construction hours	Standard hours of construction: ▪ 7:00am to 5:00pm on Monday to Friday; and ▪ 8:00am to 1:00pm on Saturday ▪ No work on Sundays and Public Holidays
Hours of operation	24 hours per day, seven days per week
Capital Investment Value	$37,503,252 (excluding GST)

3.2. DETAILED DESCRIPTION

3.2.1. Project Area

The site has approximately 50 metres street frontage to Raymond Avenue. It is bound to the west by the Bunnerong drainage channel, to the south by a detention basin and to the east by an existing two-storey industrial unit. The site is surrounded by a mix of one/two storey warehouse/distribution and industrial uses. The surrounding developments include older stock and more recent developments, also varying in size, with some small business units and some larger warehouse sites.

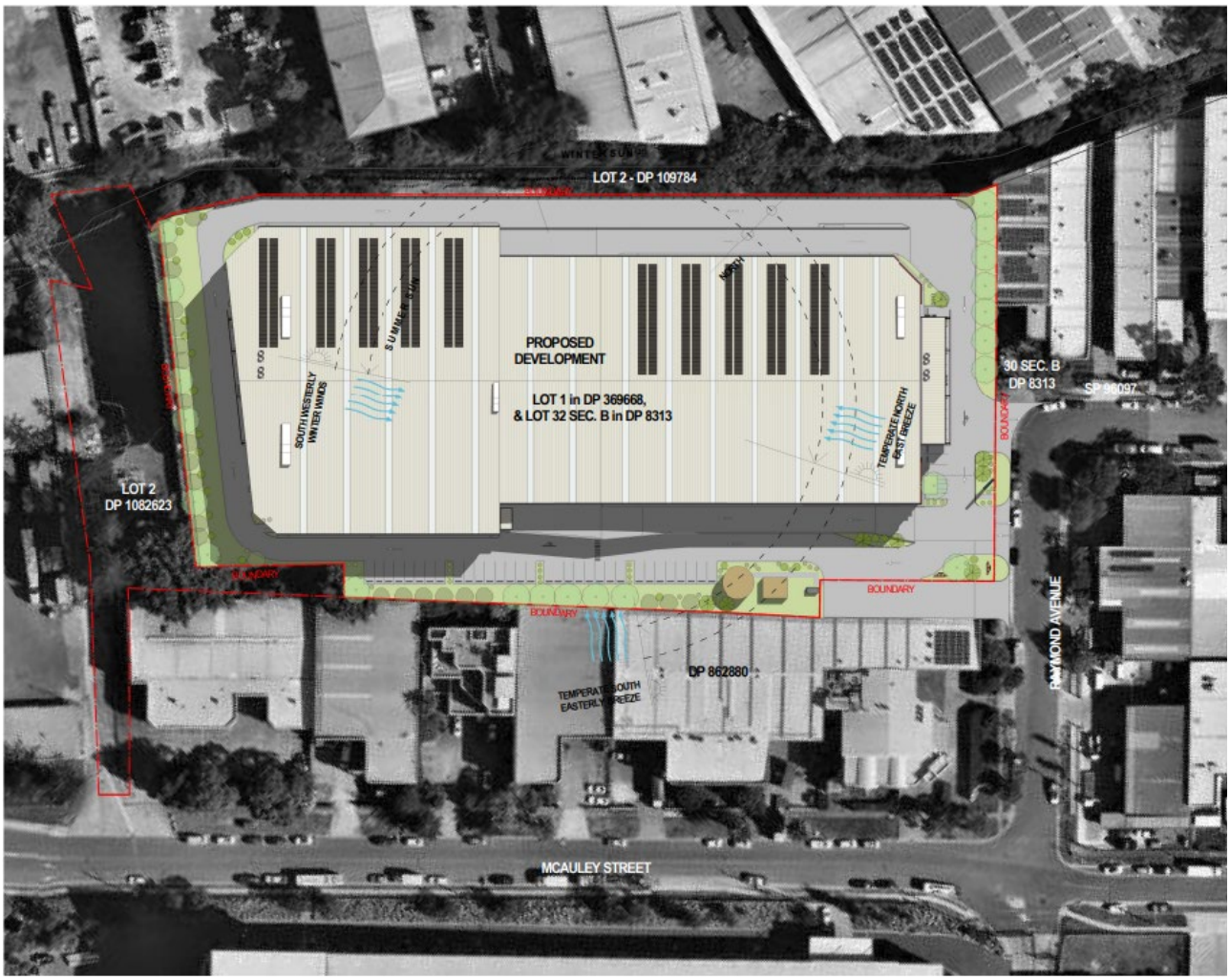
The site is a vacant brownfield industrial site, retaining a large concrete ground slab from the original warehouse building which was demolished in 2020. The site has been extensively modified and is generally clear of vegetation. The site is largely impervious consisting of hardstand and has low ecological value.

The site is located within a flood planning area and is partly affected by the probable maximum flood. A minor overland flow path exists on the north of the site which conveys overland flow from Raymond Avenue to the drainage channel.

The site is located within an established industrial precinct, with industrial and employment-generating uses located to the north, south, east and west of the site. Port Botany is located on the southern side of Botany Road. Residential land uses are east of site, at the northern end of McCauley Street in Matraville, primarily comprising single storey dwellings. The nearest residential receiver is located approximately 170 metres to the north-east of the site at 17 McCauley Street.

The developable site area for the project is shown in **Figure 5** below.

Figure 5 Project area



Source: Urbis

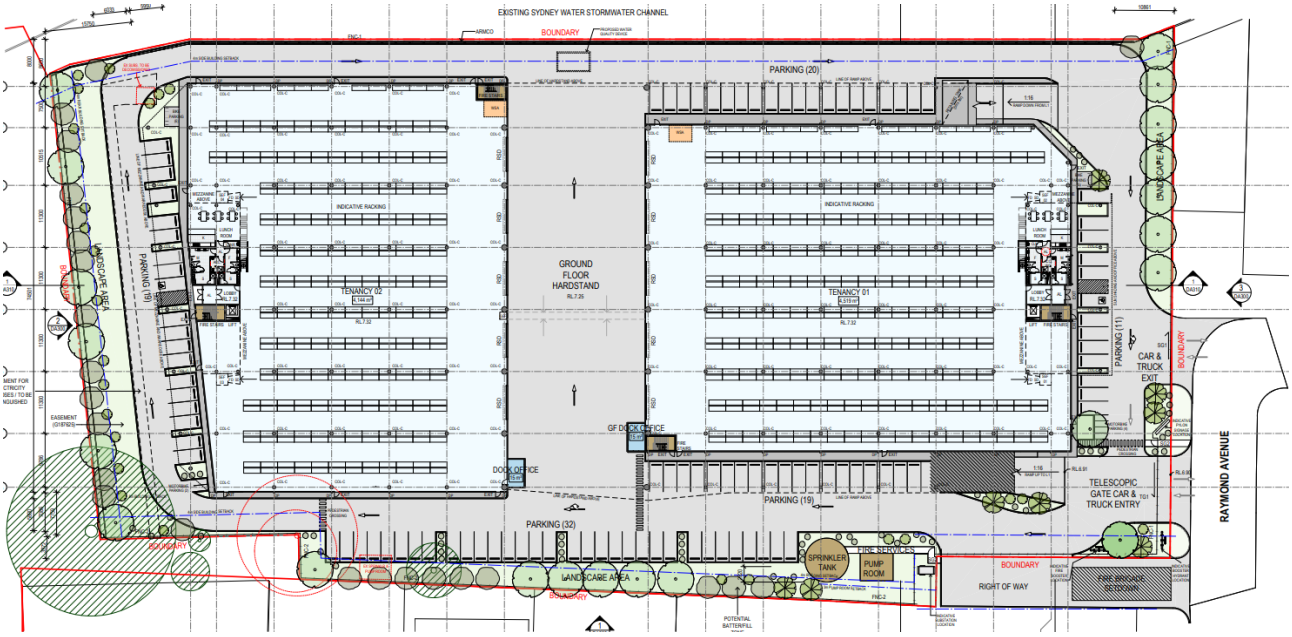
3.2.2. Physical Layout and Design

3.2.2.1. Site Layout

The proposed site layout responds to the existing site conditions and has been developed with regard to the functional requirements of the warehouse and distribution use. As shown in **Figure 6**, the proposal will involve:

- Construction of a new warehouse and distribution centre (19,460m^2) sited centrally to the site.
- A warehouse and distribution centre of two levels, each with north-eastern and south-western warehouse space connected by a central covered breezeway.
- Provision of ancillary office space at ground floor and Level 1 at the eastern and western ends of the warehouse building.
- Construction of a circular internal access road for heavy vehicles and for cars, accessed Raymond Avenue including an additional vehicle crossover. Heavy vehicle access to Level 1 is provided via ramps on the northern and southern facades on the eastern portion of the warehouse.
- Construction of at-grade car parking to all sides of the warehouse building.
- Landscaping is provided across the site at ground level including landscaping to the front setback to Raymond Avenue.

Figure 6 Proposed site plan



Source: SBA Architects

3.2.2.2. Design and Built Form

The design of the proposal reflects latest best-practice design to deliver a modern, multi-level warehouse and distribution centre.

The proposed built form is setback approximately 19 metres from the site boundary with Raymond Avenue, reflecting the general setback in the streetscape. The building is setback 8 metres from the north-western boundary, approximately 25 metres from the south-western boundary and approximately 8 metres from the eastern boundary. The maximum height of the proposed building is 22.2 metres (RL 29.52).

The built form has been designed to integrate the ancillary office space into each of the potential warehouse tenancies at both the front and rear of the site. The office space provides activation to the street frontage, including through the outdoor terrace between the lower and upper office levels. Outdoor amenity is also provided to the office space at the rear of the building. At-grade car parking has been located across the site close to the pedestrian entrances to the building to maximise pedestrian safety.

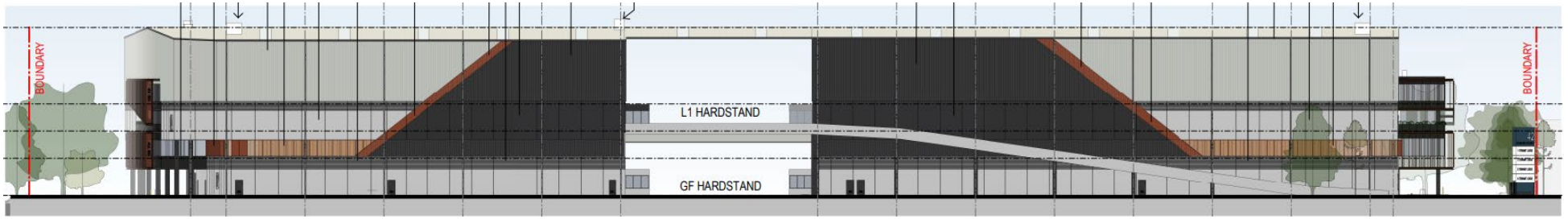
The design of the building facades has been carefully considered with fenestration, screening and a range of materials and colour palette to break up the bulk and scale of the built form. Façade materials include colorbond cladding, perforated screening and glazing.

The proposed ramp to/from the Level 1 warehouse has been accommodated within the building footprint and integrated with the building design.

Perimeter site safety fencing in the form of 1.8m metal palisade fencing is proposed. Solar panels are proposed distributed across the north-west side of the roof of the building. All panels will be flush mounted on standard fixings and positioned so as not to block the translucent roof sheeting.

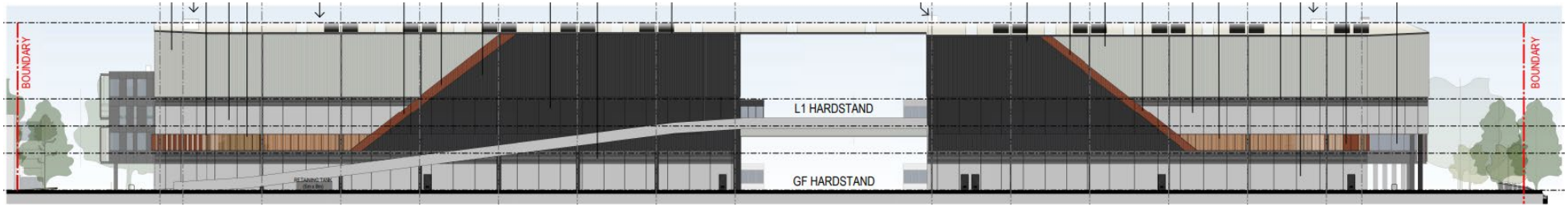
Business identification signage is proposed in the form of a pylon sign within the front setback to Raymond Avenue and tenant signage to the building façade for each warehouse tenancy. The pylon sign is proposed to be illuminated via ground spotlights with back lighting to the site address.

Figure 7 Proposed elevations



Picture 1: East elevation

Picture 2: South and North elevations



Picture 3: West elevation

Source: SBA Architects

3.2.2.3. Landscaping

The front setback to Raymond Avenue includes large native canopy trees and layered shrub planting. Landscaping is also provided to the eastern and south-eastern setbacks including large native canopy tree planting and planting of endemic plant species. Grass groundcovers are proposed along the drainage channel on the north-western site boundary. Planting is also proposed to the car parking areas and building terraces for the amenity of staff and guests and to contribute to the articulation of facades.

Tree Removal

A mature Hills Weeping Fig is located within Lot 2 of DP 1082623 and overhangs the developable site area. The tree location would inhibit a clear path of travel for light vehicles accessing the car park at the rear. Maintaining this access is vital in creating separation between light and heavy vehicles, as well as maintaining the one-way vehicular circulation on the site. The overhanging branches and root systems would likely cause maintenance concerns for the facility in the future. Historically, lopping has been required to reduce encroachment on the adjacent fire services tank and neighbouring properties.

Based on the above, retention of the Fig tree was not considered viable to meet the primary design objectives and achieve a built form that future proofs the development to accommodate for the varying requirements of potential tenants, maximising the life-cycle of the development. It is proposed to re-vegetate the site with indigenous and large canopy species, in areas of greater strategic value to the community.

A focus on the Raymond Avenue frontage will provide a high-quality street presence and enhance the public domain. Planting to the south-eastern and south-western boundaries will also improve the site amenity for employees and visitors. Given the highly urbanised and disturbed environment, this will substantially improve the current vegetation present as well as the biodiversity and habitats at the site.

Figure 8 Tree proposed for removal

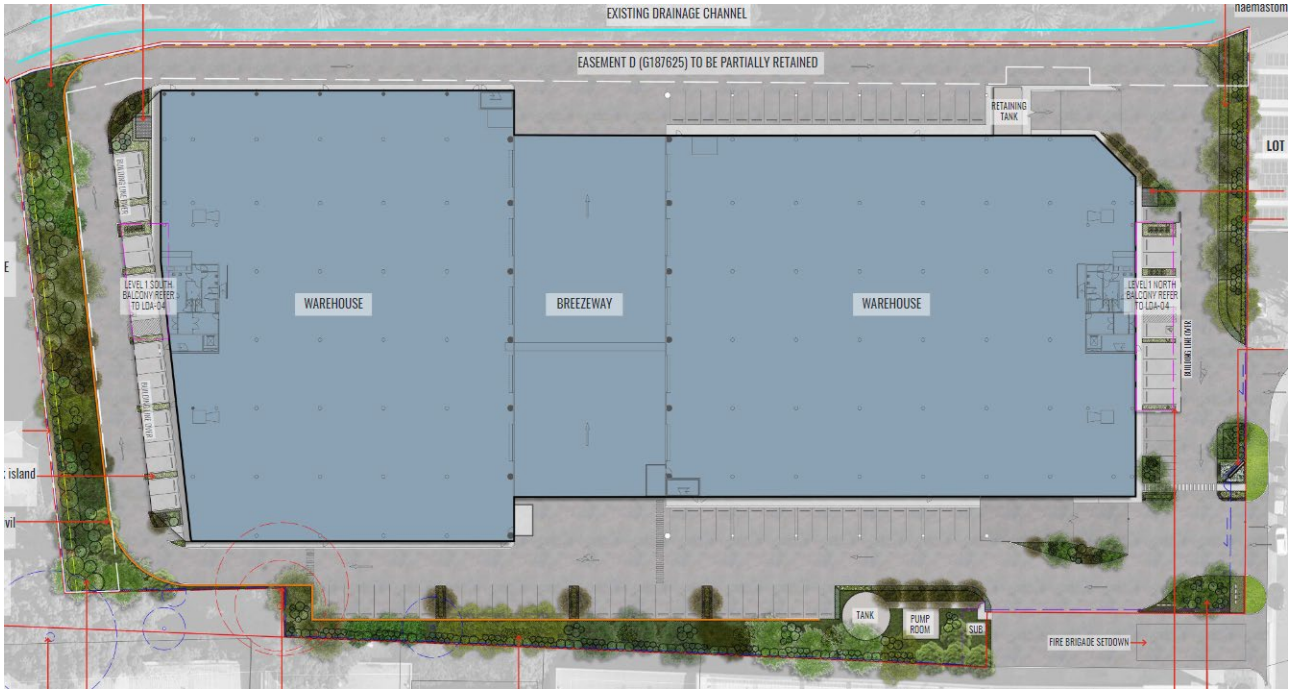
Picture 1 View of Fig tree from Raymond Avenue

Picture 2 Fig tree and adjacent sprinkler tank

Easements

The majority of the existing easements along the eastern, southern and western boundaries of the site are to be extinguished. Easement D (G187625) as shown on the Survey Plan (**Appendix G**) is to be retained along the south-western and north-western site boundaries. Where landscaping is proposed along the south-western site boundary, this has been designed to maintain the benefits of the easement including the provision of a maintenance track and root barrier. The proposed substation to serve the development is to be located at the eastern site boundary to maximise the provision of landscaping to the front setback and streetscape. The proposed landscape design is not affected by the new easements in relation to the proposed substation.

Figure 9 Proposed landscaping plan



Source: Geoscapes

3.2.3. Uses and Activities

The proposal is for a warehouse and distribution centre use with ancillary office space. On-site activities associated with the warehouse and distribution use will include:

- Loading, unloading and handling of goods and materials.
- Heavy service vehicle movements and car parking.
- Arrival and departure of employees.
- Handling of goods and materials for the purposes of storage and distribution.
- Warehouse and distribution uses are proposed to operate 24 hours a day, 7 days a week.

The purpose of the proposed ancillary office space is solely to support the function of each of the potential warehouse tenancies and enable the provision of back-of-house services. This small quantum of office space will not be occupied separately to the warehouse and distribution use.

42 Raymond Avenue is a speculative development with no tenants currently committed to occupying the tenancies within the proposed development. The facility has been designed to accommodate typical warehouse and distribution centre occupiers in accordance with the permitted use of IN1 zoning under the Three Ports SEPP. The location close to Port Botany is expected to attract port users including third party logistics providers and import/export businesses.

The ground floor has been designed to meet the needs of this target market, accommodating a wide range of freight vehicles up to B-doubles. One way circulation allows heavy vehicles to efficiently side load within the undercover breezeway. Medium rigid vehicles and smaller can rear load via the on-grade doors to each warehouse. Unloading of containers would take place on the hardstand within the breezeway.

The proximity to the airport and urban population, lends itself to last mile and ecommerce users who rely on short delivery times as a key function of their business. It is common for these types of users to adopt a hub and spoke model, with a distribution centre located in Western Sydney where larger footprints are more readily available and economically viable, and with smaller facilities in last mile locations closer to population centres. These occupiers typically use forklifts and manual handling to load goods into the rear of vans and rigid vehicles. It is anticipated that the use of articulated heavy vehicles will be limited.

Internal operations could include manual loading, forklift use and potentially minor automation including autonomous mobile robots (**AMR**) and chute conveyors would be utilised by the occupiers. There will be no use of overhead gantry cranes and other manufacturing equipment within the facility.

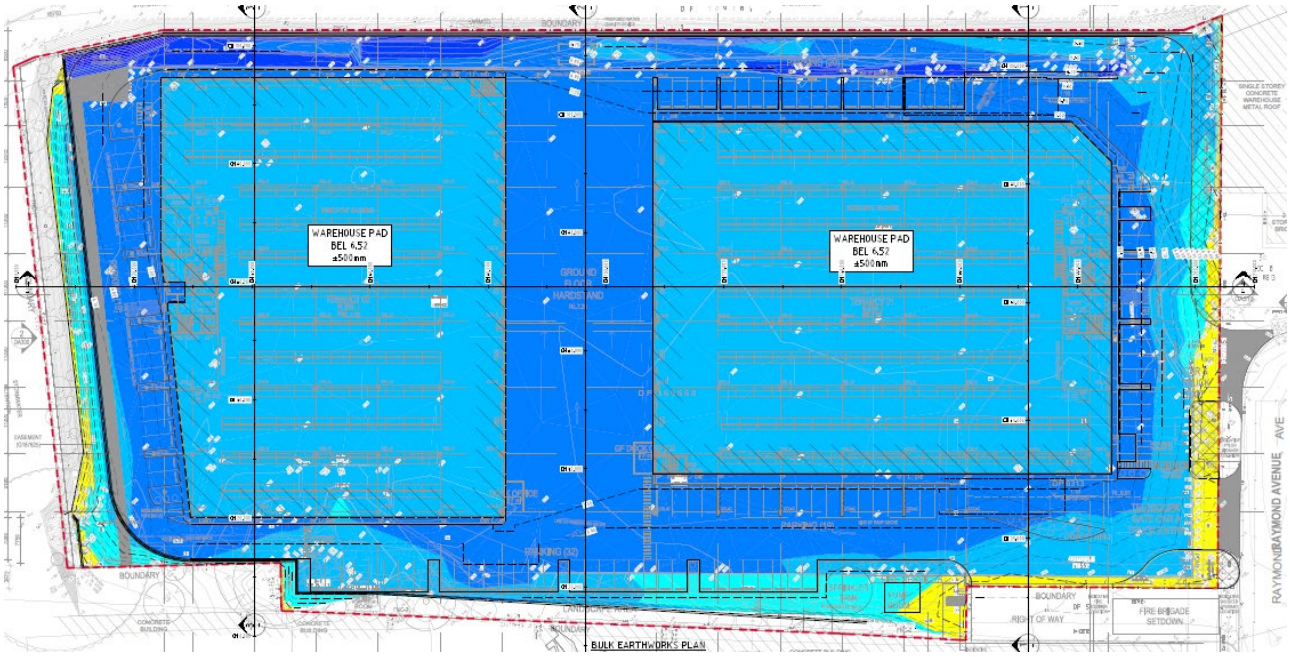
3.2.3.1. Site Preparation and Earthworks

Site preparation works include installation of site services and infrastructure and minor bulk earthworks. Earthworks will be limited to the minor import of fill to lift the new building to a ground level of FFL 7.32m, filling over the existing slab by approximately 1.5 metres. The increase in floor level is proposed so the building is 0.5 metres above the flood level (to ensure nuisance flooding from the Raymond Avenue is minimised).

The earthworks will provide a large flat building pad, hardstand area and car parking to facilitate the proposed warehouse development. Earthworks are also required to facilitate access via Raymond Avenue and to provide an overland flow path through the site via the proposed carpark.

The primary drivers for the proposed earthworks levels are achieving the required flood planning levels and minimising the extent of retaining walls, while also minimising fill as much as practical.

Figure 10 Proposed earthworks plan



Source: Costin Roe

3.2.3.2. Stormwater Management

Stormwater run-off will be collected within the proposed stormwater management system within the site and directed through several pollution treatment devices as outlined in the Civil Engineering Report at **Appendix R**. It is proposed to discharge stormwater to the Bunnerong drainage channel in agreement with Sydney Water.

3.2.3.3. Transport and Parking

Construction

All construction vehicles will access the site via the existing site access from Raymond Avenue during the construction stages. Heavy vehicle movements will be generated from minor bulk earthworks, fill importation and delivery of construction equipment and materials.

Construction will be carried out in three phases consisting of site preparation, earthworks and infrastructure; warehouse construction and fit-out; and site demobilisation, post-construction site rehabilitation, landscaping and finishing works.

Construction activities are proposed during standard construction hours of Monday to Friday 7am to 6pm, Saturday 8am to 1pm and no works on Sundays and public holidays. Some out-of-hours work may be needed to minimise disruption to the road network.

Operation

The proposed warehouse will utilise the existing and proposed additional vehicle entry points to the site from Raymond Avenue.

Heavy vehicle movements will proceed from Raymond Avenue via the new proposed access crossover to the breezeways at ground and Level one via the up-ramp along the south-eastern façade of the building. Heavy vehicles will exit the breezeways at ground and Level 1 via the down-ramp on the north-western façade of the building to Raymond Avenue via the existing site access. Car movements will proceed around the perimeter of the building to access the car parking spaces to each façade of the building.

A total of 101 car parking spaces will be provided on-site for employees and visitors including two accessible car parking spaces. Six motorcycle spaces and 11 bicycle parking spaces will be provided at ground level.

The loading and servicing bays for the proposed development are located within the covered breezeways at ground and first floor level. The breezeways have been designed with sufficient space for the unloading of the largest anticipated vehicles as well as heavy vehicles to continue to pass through the one-way circulation route through the site. The largest vehicle anticipated to access the site is a 26 metre B-double, however these vehicles will access the ground floor warehouse only, not the first floor. Space is also provided within the loading/servicing area for waste vehicles to access the waste bins.

3.2.4. Development Timing

3.2.4.1. Stages

The development is proposed to be carried out in one stage.

3.2.4.2. Phases

Construction will be carried out in three phases consisting of:

- Site preparation, earthworks and infrastructure.
- Warehouse construction and fit-out.
- Site demobilisation, post-construction site rehabilitation, landscaping and finishing works.

Construction is anticipated to commence in late 2022 (subject to development approval) and involve up to a 12 month construction programme. This will include bulk earthworks, provision of services and building construction.

3.2.4.3. Sequencing

All construction access to the development would be made via the existing crossover on Raymond Avenue. Vehicles shall utilise Botany Road when travelling to and from the site representing the shortest route to the local and regional road networks, minimising the impact of construction

4. STATUTORY CONTEXT

This section of the report provides an overview of the key statutory requirements relevant to the site and the project including:

- *Commonwealth Environment Protection and Biodiversity Conservation (EPBC) Act 1999*
- *NSW Biodiversity Act 2016*
- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning Assessment Regulation 2000.*
- *State Environmental Planning Policy (State and Regional Development) 2011*
- *State Environmental Planning Policy (Infrastructure) 2007*
- *State Environmental Planning Policy (Three Ports) 2013*
- *State Environmental Planning Policy No 55 – Remediation of Land*
- *State Environmental Planning Policy No 64 – Advertising and Signage*

It identifies the key statutory matters which are addressed in detail within the EIS, including the power to grant consent, permissibility, other approvals, pre-conditions, and mandatory considerations.

4.1. STATUTORY REQUIREMENTS

Table 7 categorises and summarises the relevant requirements in accordance with the DPE *State Significant Development Guidelines*. A detailed statutory compliance table for the modified project is provided at **Appendix C**.

State Environmental Planning Policy (Three Ports) 2013 (**The Three Ports SEPP**) is the principal environmental planning instrument applying to the site. *Randwick Local Environmental Plan 2013* does not apply to the site or the proposal.

Table 7 Identification of statutory requirements for the project

Statutory Relevance	**Action**
Power to grant approval	In accordance with Schedule 1 of the SRD SEPP, development that has a CIV of more than $30 million for the purpose of warehouse or distribution centres are classified as SSD: ***12 Warehouses or distribution centres*** *(1) Development that has a capital investment value of more than the relevant amount for the purpose of warehouse or distribution centres (including container storage facilities) at one location and related to the same operation* *(2) This clause does not apply to development for the purposes of warehouses or distribution centres to which clause 18 or clause 19 applies* *(3) In this clause –* *relevant amount means –* *(a) For development in relation to which the relevant environmental assessment requirements are notified under the Act on or before 31 May 2023 – $30 million, or*

Statutory Relevance	Action
	(b) For any other development – $50 million The proposed works have an estimated CIV of $37,503,252 (refer to Cost Estimate Report, **Appendix GG**) an accordingly, the proposal is SSD for the purposes of the SRD SEPP.
Permissibility	The site is zoned IN1 General Industrial in accordance with the *State Environmental Planning Policy (Three Ports) 2013* (Three Ports SEPP). The proposed development would be considered 'warehouse or distribution centres'. ***Warehouse or distribution centres** means a building or place used mainly or exclusively for storing or handling items (whether goods or materials) pending their sale, but from which no retail sales are made, and includes local distribution premises* Warehouse or distribution centres is listed as permitted with consent in the IN1 zone.
Other approvals	
Separate to this SSDA, Building Plan Approval (BPA) is sought from Sydney Water for construction adjacent to the Bunnerong channel.	

4.2. PRE-CONDITIONS

Table 8 outlines the pre-conditions to exercising the power to grant approval which are relevant to the project and the section where these matters are addressed within the EIS.

Table 8 Pre-conditions

Statutory Reference	Pre-condition	Relevance	Section in EIS
State Environmental Planning Policy No 55 - Remediation of Land (SEPP 55) – clause 7(1)	A consent authority must be satisfied that the land is suitable in its contaminated state - or will be suitable, after remediation - for the purpose for which the development is proposed to be carried out.	Potential sources of contamination exist at the site but are not expected to preclude the proposed development of the site.	**Section 6.1.13**

4.3. MANDATORY CONSIDERATIONS

Table 9 outlines the relevant mandatory considerations to exercising the power to grant approval and the section where these matters are addressed within the EIS

Table 9 Mandatory considerations

Statutory Reference	Mandatory Consideration	Section in EIS
Consideration under the EP&A Act and Regulation		
Section 1.3	Relevant objects of the EP&A Act	**Appendix C**
Section 4.15	Relevant environmental planning instruments ▪ SEPP – (Infrastructure) 2007	**Section 6.1.4** and **Appendix K**
	▪ SEPP 55 – Remediation of Land	**Section 6.1.13** and **Appendix Y**
	▪ SEPP 64 – Advertising and Signage	**Appendix C**
	▪ Relevant draft environmental planning instruments ▪ Draft State Environmental Planning Policy (Remediation of Land) ▪ Draft SEPP – Strategic Transport Corridors	**Appendix Y** **Appendix K**
	Relevant planning agreement or draft planning agreement ▪ None are relevant to the proposed development	
	Development control plans ▪ *Randwick Comprehensive Development Control Plan 2013* (RCDCP 2013)	**Appendix C**
	The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.	**Section 6**
	The suitability of the site for the development	**Section 2, 6 & 7**
	The public interest	**Section 7**
Mandatory relevant considerations under EPIs		
SEPP 55 – clause 7	A preliminary investigation is required in accordance with the contaminated land planning guidelines.	**Section 6.1.13** and **Appendix Y**
SEPP – Three Ports	Objectives and land uses for IN1 Zone ▪ Part 4 – State significant development and State significant infrastructure	**Appendix C**

Statutory Reference	Mandatory Consideration	Section in EIS
Considerations under other legislation		
Biodiversity Conservation Act 2016 (BC Act) – section 7.14	The likely impact of the proposed development on biodiversity values as assessed in the Biodiversity Development Assessment Report (BDAR). The Minister for Planning may (but is not required to) further consider under that BC Act the likely impact of the proposed development on biodiversity values.	**Section 6.1.7 and Appendix N**
Development Control Plans		
RCDCP2013	Clause 11 of the SRD SEPP states that development control plans (whether made before or after the commencement of this Policy) do not apply to SSD. As such, there is no requirement for assessment of the proposal against the RCDCP2013 for this SSDA. Notwithstanding this, consideration has been given to the following provisions: ▪ Part B General Controls ▪ Part D Commercial and Industrial ▪ Part F Miscellaneous	**Appendix C**
Development Contribution Plan		
RCC Section 94A Development Contributions Plan 2015	Section 94A development contribution levy of 1% applicable to development with a cost of more than $200,000	**Appendix C**

5. COMMUNITY ENGAGEMENT

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

5.1. ENGAGEMENT CARRIED OUT

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

- Department of Planning and Environment
- Government, agency, and utility stakeholders
- Randwick City Council
- Neighbouring land owners and occupants
- Community and nearby residential neighbours, specifically:
  - McCauley Street
  - Australia Avenue
  - Harold Street
  - Perry Street
  - Matraville Community Facebook Group
- Industrial neighbours, specifically:
  - Raymond Avenue
  - Beauchamp Road
  - Botany Road
  - McCauley Street
  - Perry Street.

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

- Letterbox drop: A fact sheet that outlined the key features of the proposal was distributed via letter to 318 properties (residential and industrial) and emailed to identified community groups.
- A dedicated 1800 number and email.
- Consultation was also undertaken with the certain stakeholders to inform the detailed assessment of key matters including all relevant agencies specifically:
  - Transport for NSW
  - Sydney Water
  - Ausgrid.

This engagement was consistent with the community participation objectives in the *Undertaking Engagement Guidelines for State Significant Projects* and complied with the community engagement requirements in the SEARs as summarised below:

- Detail how issues raised and feedback provided have been considered and responded to in the project. In particular, applicants must consult with:
  - the relevant Department assessment team.
  - any relevant local councils.

- any relevant agencies
- the community.

In accordance with the Regulations, the EIS will be placed on formal public exhibition once DPE has reviewed the EIS and deemed it 'adequate' for this purpose. Following this exhibition period, the applicant will respond to any matters raised by notified parties.

5.2. COMMUNITY VIEWS

The key issues raised by key stakeholders are summarised in the table below. Key themes that arose during the consultation period included:

- Vehicle access
- Traffic management
- Noise assessment and impacts
- Design excellence and design quality
- Flood assessment and impact.

At the time of writing this report, no community enquiries have been summitted through to the dedicated phone number and email address.

Table 10 Key stakeholder feedback

Key Issue	Respondent	Applicant Response
Strategic Context		
None applicable		
Project and Alternatives		
▪ Particular regard to be had to proposed landscaping including in relation to site frontage, sustainable design and screening. ▪ Articulation of long facades including articulation, breaking up of massing and inclusion of landscaping. ▪ Location of office space in relation to opportunities for casual surveillance. ▪ Site entrance to be clear in streetscape including separate of vehicle and pedestrian movements. ▪ Inclusion of sustainable design measures.	Randwick City Council	▪ A carefully considered Landscape Plan (**Appendix L**) has been prepared as part of the proposal, seeking to maximise landscaping including in views from the public realm. ▪ The design of the building has been developed to seek to mitigate any bulk and scale through the articulation of facades and landscaping, as set out in the Design Report (**Appendix F**). ▪ Office space has been located to the front and rear of the development to maximise opportunities for casual surveillance. ▪ Consideration has been given to the relationship of

Key Issue	Respondent	Applicant Response
		the proposal to the streetscape including pedestrian access as set out in the Design Report.
▪ Discharge permission into Bunnerong Stormwater Channel No. 11 including required rates of flow of discharge and water quality targets. ▪ Provision for new drainage connection to Bunnerong Stormwater Channel No. 11.	Sydney Water	▪ As set out in the Civil Engineering Report (**Appendix R**), Sydney Water confirmed no requirement for on-site storage detention and ability to discharge into the stormwater channel. Water quality targets have also been identified. ▪ As set out in the Civil Engineering Report, Sydney Water confirmed no objection to the new drainage connection to Bunnerong Channel on the basis that all unused existing connections to the channel from the site are sealed.
▪ Decommissioning of existing substation ▪ New substation proposed	Ausgrid	Design for decommissioning of existing substation and connection to proposed substation submitted to Ausgrid for review.
Relevant Statutory Issues		
▪ Design excellence and design quality	Department of Planning and Environment	A Design Report (**Appendix F**) has been prepared by SBA Architects which details the proposed design and how design excellence has been achieved.
Stakeholder Engagement		
▪ Pre-lodgement stakeholder engagement to include Sydney Water and Randwick City Council	Department of Planning and Environment	Pre-lodgement stakeholder engagement has been undertaken with Randwick City Council and Sydney Water as detailed in the Consultation Outcomes Report (**Appendix EE**).

Key Issue	Respondent	Applicant Response
Economic, Environmental and Social Impacts		
▪ Vehicular access including swept path analysis and parking ▪ Traffic management ▪ Traffic Impact Assessment to be undertaken including parking analysis and traffic generation.	Department of Planning and Environment Randwick City Council	A Transport Assessment has been prepared (**Appendix K**) including an assessment of vehicular access, swept paths, parking and traffic management, impacts in relation to heavy vehicle access, traffic generation and parking analysis.
▪ Assessment of traffic impacts including SIDRA modelling	Transport for NSW	Traffic modelling issued to TfNSW for review.
▪ Noise assessment and impacts ▪ Potential impacts on nearest residential uses ▪ Noise Assessment to be undertaken including impacts of vehicle movements between 10pm and 7am on residential receivers, access route to site, loading, unloading and ramp access.	Department of Planning and Environment Randwick City Council	A Noise Impact Assessment (**Appendix P**) has been prepared which assesses potential noise impacts as a result of the construction and operation of the proposal, including in relation to nearby residential receivers.
▪ Flood assessment to be undertaken including proposed site drainage.	Department of Planning and Environment Randwick City Council	A Flood Risk Assessment has been prepared as part of the Civil Engineering Report to assess flood planning requirements and proposed flood planning measures including drainage and stormwater management.
Justification and Evaluation of Project as a Whole		
None applicable		
Issues Beyond Scope or Not Relevant to Project		
None applicable		

5.3. ENGAGEMENT TO BE CARRIED OUT

Further community and stakeholder consultation will be undertaken if the project is approved. The proposed consultation responds to the community feedback during the preparation of the EIS and the community participation objectives in the *Undertaking Engagement* guide.

- **Key Stakeholders**: ongoing consultation is proposed with the following stakeholders:
  - Local community
  - Relevant agencies
  - Registered Aboriginal Parties.

Hale Capital will continue to keep stakeholders and the community informed of the project approval process through the exhibition and determination phases.

- **Key Actions**: the following actions will be undertaken to inform, consult and engage with the community during the implementation of the project:
  - Continuing to engage with the community about the project, its impacts and the approval process.
  - Providing information on how the community's views have been addressed in the EIS.
  - Enabling the community to seek clarification about the project through two-way communication channels.

The proposed actions are consistent with the community participation objectives in the *Undertaking Engagement* guide as summarised below:

- Providing consistent, relevant, jargon-free and up to date information on the proposal, impacts, benefits, and the SSDA process through accessible, tailored open lines of communication
- Responding appropriately and in a timely manner to concerns or questions raised by the community and stakeholders
- Facilitating information flow to the project team by establishing working relationships to ensure stakeholder and community views and local knowledge are appropriately incorporated into the design of the project
- Managing expectations by closing the feedback loop through sharing how stakeholder and community views influenced the proposal.

The effectiveness of the engagement will be monitored, reviewed and adapted over time to encourage community participation in the project.

6. ASSESSMENT OF IMPACTS

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

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

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

6.1. DETAILED ASSESSMENT IMPACTS

This section of the report provides a detailed assessment of the key issues which could have a significant impact on the site and locality. It provides a comprehensive assessment of the relevant issues and the mitigation measures required to avoid, mitigate and/or offset the impacts of the project.

6.1.1. Design Quality

A Design Report has been prepared by SBA Architects and is attached at **Appendix F**. The Design Report sets out the design qualities of the proposal and demonstrates how the proposal responds to the objectives for good design in *Better Placed*.

6.1.1.1. Existing Environment

The site is located within the Port Botany strategic precinct and comprises a vacant industrial site predominantly occupied by hardstand. The local area is characterised by a mix of industrial uses.

6.1.1.2. Potential Impacts and Mitigation Measures

In accordance with *Better Placed*, the proposal achieves design excellence in the following ways:

- The design will provide a high standard of architectural design. The materials and detailing of the building will 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.
- The built form successfully responds to its setting and the future character and setting of the location. The Raymond Avenue frontage has been recognised through the proposed built form, façade design and materiality. In addition, the form and scale of the built form also responds to the functionality of the space, operation and integration with the surrounding use context to present a modern, considered approach to the continuation of employment in the neighbourhood.
- The design seeks to balance the needs of the user efficiently and effectively. Space and purpose have been designed to respond to well thought through relationships and ease of use. Spaces have been made as flexible and as adaptive as possible. Material selections, durability and their relationships have been considered, as has the detailing and weather implications to ensure the quality of the finished form and its life cycle into the future.
- The built form has a clear identity as a warehouse and distribution centre and its use and components have been clearly defined for ease of operations and use. The overall design has enabled this legibility to complement the design outcome.
- The design responds to the local community context and the wider social context. The function itself will create employment opportunities for the local community and encourage social interaction.

- The design of the warehouse and distribution centre has thoughtfully considered how to enhance the internal and external amenity for the users, through the provisioning of landscaped greenspaces and communal areas.
- The design recognises that landscape and building operate together and as an integrated and sustainable system.
- The design has considered a sustainable landscape in an urban setting and sought to improve and organise the existing urban realm and streetscape, responding to the desired future character.
- The built form and function have considered practical and effective sustainability measures, relating to shading, ventilation, power generation and water.
- Safety has been considered and evaluated in the design process to ensure risk and harm are minimised and safe behaviour and use are supported.
- The design has taken on board the design principles identified and produced a building that has resolved the challenges and embraced the opportunities to achieve an elegant coherent outcome.
- The arrangement of built form and space has been considered in its context. The design has addressed the varying scales and form of the building in the selection and association of materials and colour. This has enabled a skilled, integrated and considered design response.

6.1.2. Built Form and Urban Design

A Design Report has been prepared by SBA Architects and is attached at **Appendix F**. The Design Report sets out the proposed design response to the site and site context, as well as the design principles that have guided the development of the design of the proposal.

6.1.2.1. Existing Environment

The existing site is vacant/cleared and contains a concrete slab. Development surrounding the site is industrial in character and includes smaller two-storey business units and large format warehouses.

6.1.2.2. Potential Impacts and Mitigation Measures

Built Form and Design

The layout and design of the proposal has been carefully considered to provide a positive visual outcome and efficient use of the site. The building massing has been designed to provide a central breezeway which allows for one-way vehicular movements through the site. The building massing also ensures that the loading docks are not visible from the public domain and better allows the architectural design to address the street frontage.

Landscaped setbacks are provided to all site boundaries. The building is setback a minimum of 8 metres from the site boundaries, with the front setback to Raymond Avenue being approximately 19 metres. This allows for large canopy tree planting to the front setback, enhancing the streetscape and public domain. All setbacks are proposed to be landscaped with the use of species from endemic communities, to soften the appearance of the site and built form. This will include large canopy tree planting with understory shrubs and groundcovers. The proposed side and rear setbacks have been considered in relation to the neighbouring site features including the drainage channel and detention basin.

The relationship of the proposed development to the street has been carefully considered to ensure that the development makes a positive contribution to the streetscape. The development proposes a high-quality office façade facing Raymond Avenue, which will be supplemented with landscape planting to further soften the streetscape appearance. The proposed front setback has been carefully considered through a review of the streetscape to confirm the appropriate setback. Soft landscaping to the front setback has been maximised to provide for visual screening of the car parking and hardstand areas behind the setback.

Consideration has been given to the architectural treatment of the facades, particularly the relationship to the public domain. The articulation of the building's front façade has been carefully considered in relation to visual impacts and views from the public domain. Muted colours have been used to reduce the scale of the built form by integrating the building into the skyline. The design of the building entrance is defined and articulated with level access from the street.

The ancillary office component of the development is proposed to be located at the front and rear of the site. This will promote active surveillance through the provisioning of windows and entrances that face the street onto Raymond Avenue. The proposed material palette makes use of a range of cladding types in a range of tonal colours to articulate the bulk and scale of the building as well as ensuring that the built form is appropriate to its local context.

The Three Ports SEPP does not provide a maximum height of building control or floor space ratio (**FSR**). Consideration has been given to the height and scale of the development based on the site context.

The site is located within the Port industrial area with nearby major industrial uses including the Matraville Paper Mill and Caltex Oil Terminal. The design development has considered the market requirement for height clearance for storage suitable for warehousing and distribution uses and the height datum of the Paper Mill at 1891 Botany Road. The development proposed two levels of warehouse and distribution space to provide industrial space and employment opportunities in a constrained industrial market.

The Paper Mill has a maximum height of RL 33.32. The proposed development when viewed from Botany Road has a proposed maximum height of 22.2m (RL 29.52), significantly lower than the Paper Mill on the adjoining block with a roof height of 26m for the entire length of the 280m long façade. When viewed at pedestrian level from McCauley Street, the line of sight to the uppermost ridge level of the proposal is screened by the fascia and eaves line of the existing buildings running north south along McCauley Street. The proposed building height steps down from the height of the Paper Mill in south-west facing views from McCauley Street and Raymond Avenue. The form of the proposed building has been designed to comply with the site setbacks in RDCP 2013. Further, the articulation of the façade and proposed materiality has been carefully considered to respond to the site setting, with horizontal banding and light, muted tones at upper level to blend the built form with the skyline beyond.

Building Code of Australia

A Building Code of Australia (**BCA**) Assessment Report has been prepared by Blackett Maguire Goldmsith and is attached as **Appendix H**.

The BCA Report undertakes an assessment of the proposed development against the provisions of the BCA. From a review of the Architectural Plans, the Report finds that the proposed development can readily achieve compliance with the relevant provisions of the BCA.

Accessibility

An Access Review has been undertaken by Morris Goding and is attached as **Appendix I**.

The Review seeks to ensure compliance with statutory requirements including the *Disability Discrimination Act 1992* and benchmark requirements in relation to accessibility. The Review considers user groups, who include staff and members of the public, and seeks to deliver equality, independence and functionality to people with a disability inclusive of people with a mobility impairment (ambulant and wheelchair), people with a sensory impairment (hearing and vision), and people with a dexterity impairment.

Through a review of the Architectural Plans, the Review finds that accessibility requirements, pertaining to external site linkages, building access, common area access, sanitary facilities and parking can be readily achieved through the proposed development.

6.1.3. Visual Impact

A Visual Impact Assessment (**VIA**) of the proposed development has been prepared by Geoscapes and is provided at **Appendix J**. The VIA analyses the likely visual effects of the built form proposed through a visual analysis of the development from key viewpoints within the public domain.

6.1.3.1. Existing Environment

The site is located centrally within the Port Botany industrial precinct. Much of the surrounding land is zoned as IN1 or IN2 industrial lands or SP1 special activities associated with Port Botany. To the east and north-east there is the presence of low and medium density residential housing. The existing landscape character is heavily influenced by industrial and infrastructure development.

6.1.3.2. Potential Impacts

Photomontages from seven viewpoints were assessed as part of the VIA. These views represent a range of viewpoints from which the development may have a visual effect or impact (**Figure 11**).

Figure 11 Photomontage viewpoints

Source: Geoscapes

For each viewpoint, the VIA assesses the visual impact of the development at both year one and at year 15, when landscaping planting proposed as part of the development will have reached maturity.

The VIA finds that the proposed development is expected to generally create minor visual impacts for people who will experience views of the development, including the residential areas within Matraville.

The highest visual impact assessed was located at the Botany Road & Beauchamp Road intersection (Viewpoint 1) and is due to the elevation, close proximity and more open view of the development. Views experienced at this viewpoint by passing motorists or pedestrians at very close distances to the site are usually transient and only temporary. Of the remaining six viewpoints, five were found to receive minor visual impacts from the proposed development and one was found to receive minor negligible visual impacts. The proposed solar panels are flush mounted to the roof of the building and will not be visible in any eye-level views.

The moderate/minor visual impact experienced at Viewpoint 1 is not considered to be of significance. It should also be noted that the pedestrian footpath at which the view can be seen has little pedestrian traffic volume and that motorists at the intersection would only experience the view for a very limited time only. Accordingly, the proposal is found to have acceptable visual impacts.

Figure 12 Visual impact assessment

Picture 1 Botany Road & Beauchamp Road Intersection - Looking North-east

Picture 2 Viewpoint 5 Raymond Avenue (North) - Looking South-west

Picture 3 Viewpoint 7 Adjacent to 94 Australia Avenue - Looking West

6.1.4. Traffic Transport and Accessibility

A Transport Assessment (**TA**) including a draft Construction Traffic Management Plan and Green Travel Plan has been prepared by Ason Group and is provided at **Appendix K**. The TA assessed the anticipated transport implications of the proposal during the construction and operational stages.

6.1.4.1. Existing Environment

There are currently two vehicular crossover providing access to the site from Raymond Avenue. The primary vehicular access is at the centre of the boundary with Raymond Avenue and provides two-way vehicular access with Raymond Avenue. The second existing site access is at the south-eastern edge of the frontage with Raymond Avenue and provides right of way access to the rear of the site.

Raymond Avenue is a local road that connects to McCauley Street in both the north and south. Raymond Avenue provides access to several industrial developments, including the site. The road provides parking and one lane of traffic in each direction and has a posted speed limit of 50km/h. The site has vehicle access to Botany Road and McCauley Street from Raymond Avenue. Currently access to the site via Raymond Avenue is not a B-double approved route, however an application is underway to allow B-doubles to access the site to and from Botany Road. This B-double application does not form part of this proposal.

Bus stops are within walking distance of the site, providing connection to Central Railway Square in the AM and PM weekday peak periods (approximately once every 10 minutes) and between Port Botany Depot and Mascot that runs approximately every 20 minutes through the broader AM and PM peaks. Footpaths are provided along both sides of Raymond Avenue, McCauley Street, and a short part of Botany Road, providing access to the bus stop in Botany Road. Additionally, there is a pedestrian crossing provided at the Botany Road / McCauley Street intersection.

The existing cycle network includes bicycle friendly routes and connecting to Sydney Airport along Botany Road to the west of the site and connecting to Port Botany via Bumborah Point Road further south of the site.

6.1.4.2. Potential Impacts

Site Access

The proposal seeks to provide access to the site via three crossovers on Raymond Avenue, of which two access driveways exist currently. An additional access crossover is proposed to be provided from Raymond Avenue, between the two existing driveways. This new driveway will provide access to the site for all vehicles including heavy vehicles, employees and visitors.

The existing driveway to the north will be used to be provide egress for all vehicles from the site to maintain the one-way circulation of all vehicles through the site. The existing right of way access is to be maintained for emergency vehicle access only and will provide access to the sprinkler booster tank on site.

Construction Traffic

As included in the TA, a Preliminary Construction Traffic Management has been prepared for the proposal outlining principles that shall be adopted as part of the pre-commencement Construction Traffic Management Plan (**CTMP**). It is expected that the final CTMP shall demonstrate the proposed management of the impact in relation to construction traffic addressing the following:

- Assessment of cumulative impacts associated with other construction activities (if any);
- Assessment of road safety at key intersections and locations to be subject to heavy vehicle construction traffic movements and high pedestrian activity;
- Details of construction program detailing the anticipated construction duration and highlighting significant and milestone stages and events during the construction process;
- Anticipated peak hour and daily construction vehicle movements to and from the site;
- On-site car parking and access arrangements of construction vehicles, construction workers to and from the site, emergency vehicles and service vehicles; and
- Details of temporary cycling and pedestrian access during construction.

Access is proposed to be provided to all construction vehicles via the existing crossover on Raymond Avenue. All construction vehicles travelling to and from the site will access Raymond Avenue from the south via McCauley Street and Botany Road to minimise any impacts of construction traffic on the local road network and the residential community to the north-east of the site.

An on-site turning area shall be provided within the future car park area so that movement to/from the site is undertaken in a forward direction, at all times. It will be included as part of the CTMP Drivers Code of Conduct that all construction vehicles shall access the site via Botany Road only, and not to utilise Perry Street adjacent to the existing Matraville residential area at any time.

The construction work will vary depending on the phase of construction and associated activities. Construction works however will be undertaken during standard construction-working hours, which are likely to be as follows:

- Monday to Friday: 7.30AM to 5:30PM
- Saturday: 7.30AM to 3.30PM
- Sunday and Public holidays: No planned work.

Some out of hours construction work may be needed to minimise disruption to the road network.

Operational Traffic

The TA has assessed the traffic impacts of the development having regard to the *RMS Guide to Traffic Generating Developments – Updated Traffic Surveys 2013* (the updated Guide), with the analysis of key intersections undertaken in SIDRA Intersection software Version 9 (**SIDRA**).

While currently vacant, the site had previously been used as an industrial warehouse with a GFA of approximately 13,800m^2, generating a daily total of 416 vehicles. As such, the proposed development represents only a moderate increase above the historic traffic generated on the site as shown in **Table 11** below.

Table 11 Traffic generation

Scenario	Vehicle Trips (veh/hr)			Daily Vehicle Trips
	AM Peak	Midday	PM Peak	
Previous warehouse use	44	39	41	416
Proposed warehouse & distribution centre	61	54	58	587
Net change	+17	+15	+17	+171

The TA assess the impact of the proposed development through evaluation of the performance of two key intersections near the site being Botany Road x McCauley Street and Perry Street x McCauley Street. The SIDRA modelling finds the identified intersections will continue to perform at an acceptable level of service as a result of the proposed development, with both intersections performing in the AM and PM peaks and at midday with a Level of Service of B or better. As such, the TA finds that the proposal is not expected to result in any adverse impacts on the surrounding road network during operation.

Car Parking

The RDCP 2013 provides a minimum car parking rate for the proposed development of 100 car parking spaces. It is proposed to provide 101 car parking spaces for staff and visitors on site at ground level. The proposed car parking on site therefore satisfies the minimum parking requirements.

In accordance with the requirements of the RDCP 2013 and BCA, two accessible car parking spaces are provided on site at ground level.

Service Vehicle Parking

As set out in the TA, service vehicle parking is proposed to be provided on site located within the hardstand of each level of the development. A total of 18 service vehicle parking spaces are provided on site, accessible to each of the potential four warehouse tenancies across the ground and first floor levels.

RDCP 2013 provides a minimum requirement for service vehicle parking spaces for industrial developments. Although the proposed service bay parking provision does not meet the RDCP 2013 requirements, the DCP notes that:

> *The number of service bays required for a development depends on the size and nature of the development. The following rates are based on the RMS Guideline. However, given the age of the data used, major developments should quantify their service vehicle requirements through new surveys of similar developments.*

Ason has undertaken an analysis of recent similar industrial/warehouse and distribution centre projects to assess actual service vehicle parking requirements. As set out in the TA, this assessment finds the proposal will require between 1 space per 778m^2 and 2,325m^2 of warehouse GFA. These lower and upper rates for service parking have been used to calculate the required service vehicle parking provision for each of the warehouse tenancies. On this basis the TA finds that the proposed service vehicle parking provision is acceptable having regard to the RDCP 2013 and RMS/TfNSW Guidelines.

Bicycle & Motorcycle Parking

The RDCP 2013 requires 11 bicycle parking spaces be provided on site. In accordance with the DCP requirements, secure bicycle parking is proposed to be provided on site at ground level with five spaces provided at the front of the site and six spaces to the rear of the site. All cycle parking is safely assessable from Raymond Avenue via the internal circulation route on site.

In accordance with the RDCP 2013, six motorcycle parking spaces are also provided at ground level.

Green Travel Plan

A Framework Green Travel Plan (**FTP**) has been prepared for the proposal and is included within the TA. The overall intention of the FTP is to encourage and facilitate the use of alternative and sustainable modes of transport. The FTP sets out the targets for the reduction in car journeys associated with the site with a focus on encouraging modal shifts away from private vehicles to utilising the existing public and active transport network.

The FTP sets out a range of measures to achieve the sustainable travel objectives and mode share targets:

- An introduction to the Plan for all staff, setting out its purpose and objectives.
- Provision of public transport travel information for staff, customers and visitors.
- Encouragement of car sharing, both amongst staff on site and in the wider context.
- Provision of car share spaces (future potential measure) and / or provision of a business “pool car” while public car share operators are limited in the area.
- Assisted cycle purchase schemes.
- Interest free loans to assist with cycle purchase, cycle equipment purchase etc.
- A transport section on the company website with links to local bus operator sites, to ensure that travel information is always up to date.
- The provision of transport information for visitors to the Site.

The FTP sets out measures and action strategies that can be implemented by the future development to seek to achieve the mode targets. The implemented Green Travel Plan is to be in place for the lifetime of the development. The initial timeframe in which targets need to be monitored and reviewed will be reviewed annually, for a minimum period of the first 5 years.

6.1.4.3. Mitigation Measures

In relation to the construction of the proposal, the Preliminary Construction Traffic Management Plan recommends the following mitigation measures to minimise the impacts of the construction activities on the surrounding road network:

- Temporary exclusion fencing (chain mesh fencing) will be erected along the entire boundary of the site and will be maintained for the duration of the construction program.
- Handling of all materials throughout the construction period shall adhere to the following:
  - It is proposed that all material loading will occur within the construction site boundary.
  - No loading is proposed to occur outside of the provisioned areas.
  - Equipment, materials, and waste will be kept within the construction site boundary.
- All vehicles transporting loose materials will have the entire load covered and/or secured to prevent any large items, excess dust or dirt particles depositing onto the roadway during travel to and from the site.
- An authorised Traffic Controller is to be present on-site throughout the construction stage of the project.

6.1.5. Trees and Landscaping

An Arboricultural Impact Assessment (**AIA**) has been prepared by Canopy Consulting (**Appendix FF**) which assesses the existing trees on site and makes recommendations for trees to be removed to facilitate the proposal. Landscape Plans have been prepared by Geoscapes (**Appendix L**) which set out the proposed landscape design for the site.

6.1.5.1. Existing Environment

The existing site predominantly consists of hardstand and is generally clear of vegetation, except for a small number of existing trees in the south east corner and shrubs to the verge of the drainage channel. No trees on site are listed under the Randwick City Council Register of Significant Trees. The existing site is largely impervious consisting of concrete slab and has low ecological value.

6.1.5.2. Potential Impacts

Trees

The AIA includes a survey of the existing trees on site. As shown in **Figure 13**, eight existing trees were recorded along the south-eastern boundary of the site. Two of these trees are considered of high landscape value (Hills Weeping Fig**)** and six trees are considered of low landscape value.

Three trees are proposed for removal, two of which are assessed as having low landscape value and as suitable for removal. One tree for removal is of high landscape value, however the AIA finds that the removal of this tree will be satisfactorily mitigated through the planting of 67 species, largely of indigenous origin. On this basis, the proposed development is likely to enhance the amenity and environmental value of the site, local area and LGA and offset the loss of the Hills Weeping Fig tree.

The AIA also sets out mitigation measures in relation to the management of tree protection zones (**TPZ**) for the trees to be retained on site and includes a Tree Protection Management Plan to ensure trees retained on site remain viable post construction.

Figure 13 Tree survey

Source: Canopy Consulting

Landscaping

The proposed landscaping design seeks to off-set the removal of the mature Hills Weeping Fig and revegetate large areas of the site with indigenous species. This long-term landscape approach will include large canopy species such as Corymbia gummifera and Eucalyptus botryoides supplemented by smaller Banksia and Leptospermum.

By using tall broad indigenous species this will significantly increase the existing canopy cover on the site and aid in mitigating urban heat island effect. This approach is also consistent with the *'Greener Places*' design guide by contributing to urban tree canopy cover. Proposed planting will consist of those found in local communities such as Coastal mantle heath, Coastal sandplain heath and Coastal sand Apple-Bloodwood forest and these will be used to plant layered trees, shrubs and groundcovers.

The appearance of the streetscape will be enhanced from the current site condition with tree planting along the north-eastern boundary. Site entries will be enhanced with flowering species to help with orientation and wayfinding. The building is also proposed to feature landscaping with trailing plants on the upper level including to the outdoor staff amenity terraces.

The proposal has been designed to maximise the landscaped area including to setbacks, outdoor staff amenity areas and car parking areas. Approximately 2,250m^2 of soft and hard landscaping at ground level is proposed with 2,187m^2 tree canopy cover which equates to 11% of the developable site area.

Landscaping will be utilised to soften and screen buildings, service and parking areas and will provide shade for staff and visitors as well as screening to the site boundaries. Landscaping is proposed to be provided to the car parking areas with planting to approximately every four car parking spaces. Where landscaping is proposed in areas where easements are to be retained on site or proposed easements, the landscaping has been designed to ensure that any planting will reach maturity whilst the rights of the easements can be maintained.

The proposed landscaping design will greatly enhance the level of planting and biodiversity on site as well as enhancing the streetscape and public domain.

6.1.5.3. Mitigation Measures

Tree Protection

- Tree protection fencing.
- Landscaping activities are to be low impact and sensitive to tree roots.
- Supervision of works within the fenced TPZ.
- Retention of the existing concrete slab in situ within the TPZ of tree 8.

Offset

As set out above, to mitigate the removal of the Hills Weeping Fig tree at the south-eastern corner of the site, a high level of planting is proposed across the site including large native copy trees.

It is considered that the proposed landscaping design and planting of indigenous species will mitigate the loss of the tree to be removed. In addition, the proposed landscape design provides a greater level of amenity to the streetscape and public domain.

6.1.6. Ecologically Sustainable Development

A Sustainability Management Plan (**SMP**) has been prepared by SLR and is provided at **Appendix M**. The Report identifies potential energy savings that may be implemented into the design and during the operational phase of the development, including a description of likely energy consumption levels and options for alternative energy sources.

6.1.6.1. Potential Impacts

The objectives of the SMP are:

- To encourage energy use minimisation through the implementation of energy efficiency measures;
- To promote improved environmental outcomes through energy management;
- To ensure the appropriate management of high energy consumption aspects of the project;
- To identify energy savings procedures for overall cost reduction, greenhouse gas emission reduction and effective energy management;
- To assist in ensuring that any environmental impacts during the operational life of the development comply with relevant regulatory authorities; and

- To ensure the long-term sustainability of resource use through more efficient and cost-effective energy use practices for the life of the development.

The SMP identifies the major energy use components of the proposal as lighting (including natural and artificial lighting and shading), air conditioning and power. The SMP provides sustainability measure initiatives for the incorporation and implementation of ESD principals in the design, construction and operation phases of the project.

The proposed sustainability measures include the following strategies:

- Design and management
- Façade performance
- Social sustainability
- Minimising transport impact
- Optimising indoor environmental quality (**IEQ**)
- Minimising energy use
- Materials selection
- Waste minimisation
- Water conservation and reuse
- Ecological impact.

The SMP identifies energy efficiency measures in relation to artificial lighting, mechanical air conditioning, building fabric, domestic hot water and minimisation of greenhouse gas emissions. To significantly reduce greenhouse gas emissions in relation to the proposal, a large-scale PV solar system is proposed on the roof of the warehouse to contribute towards the goal to achieve net zero emissions.

The proposal also includes a number of sustainable water-saving measures including a rainwater reuse and reticulation system for the harvest of rainwater and reuse for irrigation and toilet flushing, the use of water saving plumbing devices and waster sensitive landscape design.

Overall, the development is targeting a 4-star Design & As built NABERS rating. With the implementation of the PV solar system and the outlined energy efficiency measures, it is predicted the project will achieve a greenhouse gas emission reduction of a minimum of 40% when compared with the 2019 National Construction Code (**NCC**) Reference Building.

6.1.7. Biodiversity

A Biodiversity Development Assessment Report (**BDAR**) Waiver has been prepared by Ecologique and is attached at **Appendix N**. The BDAR includes an ecological assessment of the site and biodiversity values associated with the construction of the proposal. DPE has determined that the proposed development is not likely to have any significant impact on biodiversity values and therefore a BDAR is not required to accompany the SSDA. The BDAR Waiver is attached as **Appendix HH**.

6.1.7.1. Existing Environment

The site is located within a highly urbanised and disturbed environment and is surrounded by existing industrial development. Concrete lined channels form the subject site's boundaries from the north-west to south-west (Sydney Water's Bunnerong Stormwater Channel No. 11) and south-east to south-west (the detention basin).

Native vegetation includes two large Hills Weeping Fig trees (Ficus macrophyllavar hillii) and four Norfolk Pines (Araucaria heterophylla) within southern basin lot (Lot 2 in Deposited Plan 1082623). Other vegetation within the site is limited to weed growth along the boundary to the Bunnerong Stormwater Channel No. 11 and on the embankment of the detention basin.

The subject site does not provide habitat for any other threatened species recorded from within a 10km search radius of the site.

6.1.7.2. Potential Impacts

The proposal requires the removal of a Fig tree on Lot 2. The remaining trees will not be disturbed or otherwise impacted by the proposal.

Review of historical imagery and the natural occurrence of these species, provides evidence that all trees were planted and are not representative of a naturally occurring vegetation community within the locality. The tree proposed for removal is located immediately adjacent a fire sprinkler tank and walls of the adjacent property. The tree has historically had branches lopped to reduce encroachment over the sprinkler tank and adjacent building and would require continued lopping over time should it remain.

When fruiting, the Fig trees provide potential foraging habitat for Pteropus poliocephalus (grey-headed flying-fox), which is listed as a vulnerable species under the BC Act and EPBC Act.

The BDAR waiver undertakes a 'test of significance' under the BC Act and 'significance of impact assessment' under the EPBC Act. This assessment has concluded that the Fig trees within the site do not provide habitat important to the Grey-headed flying-fox, or other potential threatened species or their habitat. No direct or indirect significant impacts are considered likely as a result of any future development of the site, due to the following:

- Lack of suitable habitat for listed threatened species;
- Isolation of existing vegetation and lack of wildlife corridor movement; and
- Existing highly disturbed industrial based environment, surrounding roads and high frequency of urban traffic and resultant noise pollution.

The BDAR waiver concludes that the proposal would not have a significant impact on the grey-headed flying-fox, any threatened ecological communities, or other threatened species or populations.

6.1.8. Air Quality

An Air Quality Impact Assessment (**AQIA**) has been prepared by Northstar and is attached as **Appendix O**. The AQIA undertakes an assessment of the risks to local air quality associated with the construction and operation of the proposed development.

6.1.8.1. Existing Environment

The land use surrounding the site is zoned IN1 (General Industrial). The closest residential property is approximately 170 metres from the site boundary to the north-east, on McCauley Street.

6.1.8.2. Potential Impacts

The AQIA identifies twelve discrete receptor locations within the vicinity of the site which represent a selection of locations that may be susceptible to changes in air quality. These include sensitive receptors, being the nearest residential property.

The AQIA takes into consideration local population density, topography and meteorological conditions, as well as taking into consideration the background air quality conditions. The AQIA also takes into consideration the potential for cumulative air quality impacts in relation to surrounding developments.

Construction Phase

Construction phase activities have the potential to generate short-term emissions of particulates. Generally, these are associated with uncontrolled (or 'fugitive') emissions and are typically experienced by neighbours as amenity impacts, such as dust deposition and visible dust plumes, rather than being associated with health-related impacts.

The AQIA assesses the construction phase air quality impacts associated with the proposal using a risk-based assessment procedure. This determines the activities that pose the greatest risk, which allows the Construction Environmental Management Plan (**CEMP**) to focus controls to manage that risk appropriately and reduce the impact through proactive management.

The assessment finds there to be a high risk of adverse dust soiling and human health impacts at sensitive receptors, if no mitigation measures were to be applied to control emissions associated with construction activities and construction traffic. Track-out activities would result in a medium risk of dust soiling and human health impacts, while earthworks are associated with a low risk.

However, a range of standard mitigation measures are proposed to ensure that short-term impacts associated with construction activities are minimised to achieve an acceptable level of air quality. With the proposed construction phase mitigation measures, the air quality impacts are found to be negligible.

Operation Phase

The AQIA undertakes an assessment of the impacts of the operation of activities at the development site likely to be performed, which characterises the likely day-to-day (and hour-to-hour) operation, approximating average operational characteristics which are appropriate to assess against longer term (annual average) and shorter term (24-hr and 1-hr) criteria for emissions to air. The height of emissions, specifically associated with the ramp up to, and down from, Level 1 as part of the proposal has been taken into account in the AQIA modelling assessment.

In relation to particulate matter (TSP, PM10, PM2.5 and dust deposition), the AQIA finds that the operation of the proposal does not result in any exceedances of the annual average particulate matter impact assessment criteria at any of the receptors. In relation to annual average dust deposition rates, annual average dust deposition is predicted to meet the criteria at all receptors surrounding the site. As such, the operation of the proposal does not result in any exceedances of the annual average dust deposition impact assessment criteria.

The AQIA assesses maximum 24-hour average particulate matter (PM_{10} and $PM_{2.5}$) concentrations, such as vehicle emissions. The predicted incremental concentrations of PM_{10} and $PM_{2.5}$ as a result of the proposal are found to be minor. The AQIA also assesses the cumulative impacts of the predicted maximum 24-hour average PM_{10} and $PM_{2.5}$ concentrations resulting from the operation of the proposal with background concentrations. This cumulative assessment finds that, with the addition of background concentrations, the impacts are not in exceedance of the relevant criterion. The analysis finds that no exceedances of the 24-hour average impact assessment criteria for PM_{10} or$PM_{2.5}$ are likely to occur as a result of the operation of the proposal. No exceedances of the PM_{10} or $PM_{2.5}$ criteria are predicted at any receptor location and therefore the operational particulate matter impacts of the proposal are considered to be acceptable.

In relation to nitrogen dioxide emissions (NO_2), the AQIA assesses the predicted maximum 1-hour and annual average NO_2 concentrations resulting from the operation of the development. The AQIA finds that the operation of the proposal does not result in any exceedances of the criteria for combustion related NO_2 pollutants at any receptors.

Based on the findings of the AQIA, it is considered that the operation of the proposal would result in the achievement of all air quality criteria, even following the adoption of potential worst-case operating conditions. Accounting for the background air quality conditions, and adopting worst-case assumptions in relation to truck idling, the assessment does not predict any additional exceedances of the respective criteria as a result of the operation of the proposal. No specific mitigation measures are considered to be required to minimise impacts on surrounding receptor locations.

6.1.8.3. Mitigation Measures

The following mitigation measures are proposed for the construction phase:

Communication

- Develop and implement a stakeholder communications plan that includes community engagement before work commences on site.
- Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary. This may be the environment manager/engineer or the site manager.
- Display the head or regional office contact information.
- Develop and implement a Dust Management Plan (**DMP**), which may include measures to control other emissions, approved by the relevant regulatory bodies.

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.
- Make the complaints log available to the local authority when asked.

- Record any exceptional incidents that cause dust and/or air emissions, either on- or offsite, and the action taken to resolve the situation in the log book.
- Hold regular liaison meetings with other high-risk construction sites within 500 metres of the site boundary, to ensure plans are coordinated and dust and particulate matter emissions are minimised. It is important to understand the interactions of the off-site transport/ deliveries which might be using the same strategic road network routes.

Monitoring

- Carry out regular site inspections to monitor compliance with the DMP / CEMP, record inspection results, and make an inspection log available to the local authority when asked.
- Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.

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.
- Erect solid screens or barriers around dusty activities or the site boundary that they are at least as high as any stockpiles on site.
- Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period.
- Avoid site runoff of water or mud.
- Keep site fencing, barriers and scaffolding clean using wet methods.
- Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site cover as described below.
- Cover, seed or fence stockpiles to prevent wind erosion.

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.
- Avoid the use of diesel or petrol-powered generators and use mains electricity or battery powered equipment where practical.
- Impose and signpost a maximum-speed-limit of 25 km/h on surfaced and 15 km/h on unsurfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authority, where appropriate).
- Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials.
- Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing).

Construction Operations

- Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems.
- Ensure an adequate water supply on the site for effective dust/particulate matter suppression/ mitigation, using non-potable water where possible and appropriate.
- Use enclosed chutes and conveyors and covered skips.
- Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.

- 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.

Construction Activities

- Avoid scabbling (roughening of concrete surfaces) if possible.
- Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.
- 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.
- For smaller supplies of fine power materials ensure bags are sealed after use and stored appropriately to prevent dust.

Measures Specific to track-out

- Use water-assisted dust sweeper(s) on the access and local roads to remove, as necessary, any material tracked out of the site.
- Avoid dry sweeping of large areas.
- Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.
- Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.
- Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned.
- Access gates to be located at least 10 metres from receptors where possible.

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.
- Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.
- Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.
- Record all inspections of haul routes and any subsequent action in a site log book.

6.1.9. Noise and Vibration

A Noise Impact Assessment (**NIA**) has been prepared by SLR and is included at **Appendix P**. The NIA assesses the noise and vibration impacts during the construction and operational stages of the proposal.

6.1.9.1. Existing Environment

The nearest receivers are commercial developments located 10 metres to the east and the north of the site at 40 McCauley Street and 40 Raymond Avenue. Industrial developments are located 20 metres to the west of the site at 73-79 Beauchamp Road. The nearest residential receivers are located approximately 170 metres to north-east of the site at 17 McCauley Street.

Background noise monitoring has been undertaken as part of the NIA including the measurement of existing noise levels that are representative of receivers potentially most affected by the proposal. The NIA finds that existing ambient noise levels are typically dominated by industrial noise from existing industrial developments and road traffic noise from the surrounding road network.

6.1.9.2. Potential Impacts

Construction noise and vibration

The NIA undertakes a noise model of the study area to predict noise levels from the proposed construction work to all surrounding receivers. The noise model includes local terrain, receiver buildings and structures in the area surrounding the site. The assessment uses 'realistic worst-case' scenarios to determine the impacts from the noisiest 15-minute period that is likely to occur for each construction work scenario.

The NIA finds that noise levels from all construction activities are expected to comply with the required noise management levels at the nearest residential receivers. No residential receivers are predicted to be highly affected during any of the construction works.

Worst-case exceedances of around 10 to 15 dB are predicted at the adjacent commercial receivers, however, this would only be expected to occur when noisy work is being completed close to the site boundaries. When work is in other areas of the site, or when less noise intensive equipment is being used, the noise levels are expected comply with the noise management levels.

In relation to vibration impacts from construction work, the NIA finds that the distance between the construction works and the nearest sensitive receivers is generally sufficient for most receiver buildings to be outside of the cosmetic damage minimum working distance for vibration intensive equipment.

However, the nearest commercial buildings are likely to be within the minimum working distances when vibratory rollers are in use nearby during construction. Management and mitigation measures are proposed to mitigate these impacts (as below). The NIA also finds that several commercial and industrial developments are within the human comfort minimum working distance and occupants of these buildings may be able to perceive vibration impacts at times when vibratory rollers are in use nearby during construction. Where impacts are perceptible, they would likely only be apparent for relatively short durations when vibration intensive equipment is in use.

The NIA identifies that there is the potential for construction vibration impacts to the Bunnerong Channel when vibration intensive construction work is being undertaken in proximity to the north-western site boundary. To mitigate this appropriate minimum working distances, an exclusion zone to the stormwater channel and management measures will be developed with Sydney Water as required.

Operational noise

The NIA identifies that the main sources of operational noise at the development are expected to include on-site medium and heavy vehicle movements (accessing both ground and first floor levels), loading dock activities within breezeways (on both ground and first floor levels), mechanical plant and off-site vehicle movements.

In relation to operational noise impacts, the NIA assesses two representative worst-case scenarios for the expected operation of the warehouse and distribution centre. The NIA finds that operational noise impacts are predicted to comply with the required noise levels at most receivers during both scenarios. However, exceedances of 1 to 2 dB are predicted to occur at the nearest residential receiver during the night time. The predicted exceedances are caused by a combination of noise from the roof mounted fans, on-site truck movements and loading activities. Mitigation measures are proposed to reduce noise impacts in accordance with the required noise levels. The implementation of the proposed mitigation measures will provide for acceptable operational noise impacts.

The NIA also assesses the potential for night-time sleep disturbance at the nearest residential receives as a result of the operation of the development. The predicted maximum noise levels at all surrounding receivers are expected to be below the levels required that would be considered to have the potential to cause sleep disturbance and are comparable to or lower than existing maximum noise levels from existing vehicles on the surrounding roads. As such, the predicted minor sleep disturbance exceedances are considered of low significance and do not warrant any specific mitigation measures.

6.1.9.3. Mitigation Measures

The following construction noise and vibration mitigation measures are proposed:

Table 12 Construction noise and vibration mitigation measures

Management measures		
Implement community consultation or notification measures	Airborne noise Ground-borne noise & vibration	▪ Notification detailing work activities, dates and hours, impacts and mitigation measures, indication of work schedule over the night-time period, any operational noise benefits from the works (where applicable) and contact telephone number. ▪ Notification should be a minimum of 7 calendar days prior to the start of works. For projects other than maintenance works more advanced consultation or notification may be required. Contact Roads and Maritime Communication and Stakeholder Engagement for guidance. ▪ Website (If required) ▪ Contact telephone number for community Email distribution list (if required) ▪ Community drop-in session (if required by approval conditions)
Site inductions	Airborne noise Ground-borne noise & vibration	All employees, contractors and subcontractors are to receive an environmental induction. The induction must at least include: ▪ all project specific and relevant standard noise and vibration mitigation measures ▪ relevant licence and approval conditions ▪ permissible hours of work ▪ any limitations on high noise generating activities ▪ location of nearest sensitive receivers ▪ construction employee parking areas ▪ designated loading/unloading areas and procedures ▪ site opening/closing times (including deliveries) ▪ environmental incident procedures.
Behavioural practices	Airborne noise	▪ No swearing or unnecessary shouting or loud stereos/radios on site. ▪ No dropping of materials from height, throwing of metal items and slamming of doors.
Verification	Airborne noise Ground-borne noise & vibration	Where specified under Appendix C of the Roads and Maritime (now Transport for NSW) *Construction Noise and Vibration Guideline* (**CNVG**) a noise verification program is to be carried out for the duration of the works in accordance with the Construction Noise and Vibration Management Plan and any approval and licence conditions.
Attended vibration measurements	Ground-borne vibration	Where required attended vibration measurements should be undertaken at the commencement of vibration generating

		activities to confirm that vibration levels are within the acceptable range to prevent cosmetic building damage.
Update Construction Environmental Management Plans	Airborne noise Ground-borne noise & vibration	The CEMP must be regularly updated to account for changes in noise and vibration management issues and strategies.
Building condition surveys	Vibration Blasting	Undertake building dilapidation surveys on all buildings located within the buffer zone prior to commencement of activities with the potential to cause property damage.
Bunnerong Stormwater Channel	Ground-borne vibration	Appropriate minimum working distances, an exclusion zone to the stormwater channel and management measures will be developed with Sydney Water as required.
Source controls		
Construction hours and scheduling	Airborne noise Ground-borne noise & vibration	Where feasible and reasonable, construction should be carried out during the standard daytime working hours. Work generating high noise and/or vibration levels should be scheduled during less sensitive time periods.
Construction respite period during normal hours and out-of-hours work	Ground-borne noise & vibration Airborne noise	See Appendix C of the CNVG for more details on the following respite measures: ▪ Respite Offers (RO) ▪ Respite Period 1 (R1) ▪ Respite Period 2 (R2) ▪ Duration Respite (DR)
Equipment selection	Airborne noise Ground-borne noise & vibration	Use quieter and less vibration emitting construction methods where feasible and reasonable. For example, when piling is required, bored piles rather than impact-driven piles will minimise noise and vibration impacts. Similarly, diaphragm wall construction techniques, in lieu of sheet piling, will have significant noise and vibration benefits. Ensure plant including the silencer is well maintained.
Plant noise levels	Airborne-noise	The noise levels of plant and equipment must have operating Sound Power or Sound Pressure Levels compliant with the criteria in Appendix H of the CNVG. Implement a noise monitoring audit program to ensure equipment remains within the more stringent of the manufacturer's specifications or Appendix H of the CNVG.
Rental plant and equipment	Airborne-noise	The noise levels of plant and equipment items are to be considered in rental decisions and in any case cannot be used on site unless compliant with the criteria in Table 2 of the CNVG.
Use and siting of plant	Airborne-noise	▪ The offset distance between noisy plant and adjacent sensitive receivers is to be maximised. ▪ Plant used intermittently to be throttled down or shut down.

		▪ Noise-emitting plant to be directed away from sensitive receivers. ▪ Only have necessary equipment on site.
Plan worksites and activities to minimise noise and vibration	Airborne noise Ground-borne vibration	▪ Locate compounds away from sensitive receivers and discourage access from local roads. ▪ Plan traffic flow, parking and loading/unloading areas to minimise reversing movements within the site. ▪ Where additional activities or plant may only result in a marginal noise increase and speed up works, consider limiting duration of impact by concentrating noisy activities at one location and move to another as quickly as possible. ▪ Very noise activities should be scheduled for normal working hours. If the work cannot be undertaken during the day, it should be completed before 11:00pm. ▪ Where practical, work should be scheduled to avoid major student examination periods when students are studying for examinations such as before or during Higher School Certificate and at the end of higher education semesters. ▪ If programmed night work is postponed the work should be re-programmed and the approaches in this guideline apply again.
Reduced equipment power	Airborne noise Ground-borne vibration	Use only the necessary size and power.
Non-tonal and ambient sensitive reversing alarms	Airborne noise	▪ Non-tonal reversing beepers (or an equivalent mechanism) must be fitted and used on all construction vehicles and mobile plant regularly used on site and for any out of hours work. ▪ Consider the use of ambient sensitive alarms that adjust output relative to the ambient noise level.
Minimise disturbance arising from delivery of goods to construction sites	Airborne noise	▪ Loading and unloading of materials/deliveries is to occur as far as possible from sensitive receivers. ▪ Select site access points and roads as far as possible away from sensitive receivers. ▪ Dedicated loading/unloading areas to be shielded if close to sensitive receivers. ▪ Delivery vehicles to be fitted with straps rather than chains for unloading, wherever possible. ▪ Avoid or minimise these out of hours movements where possible.
Engine compression brakes	Construction vehicles	▪ Limit the use of engine compression brakes at night and in residential areas.

		▪ Ensure vehicles are fitted with a maintained Original Equipment Manufacturer exhaust silencer or a silencer that complies with the National Transport Commission's 'In-service test procedure' and standard.
Path controls		
Shield stationary noise sources such as pumps, compressors, fans etc.	Airborne noise	Stationary noise sources should be enclosed or shielded where feasible and reasonable whilst ensuring that the occupational health and safety of workers is maintained. Appendix D of AS 2436:2010 lists materials suitable for shielding.
Shield sensitive receivers from noisy activities	Airborne noise	Use structures to shield residential receivers from noise such as site shed placement; earth bunds; fencing; erection of operational stage noise barriers (where practicable) and consideration of site topography when situating plant.
Receptor control		
Structural surveys and vibration monitoring	Ground-borne vibration	▪ Pre-construction surveys of the structural integrity of vibration sensitive buildings may be warranted. ▪ At locations where there are high-risk receptors, vibration monitoring should be conducted during the activities causing vibration.

The following operational noise and vibration mitigation measures are proposed:

- Lower noise output from roof mounted fans
- Use of broadband and/or ambient noise sensing reversing alarms
- Roller doors to be kept closed when un/loading is not occurring.

6.1.10. Ground and Water Conditions

Ground Conditions

A Detailed (Stage 2) Geotechnical Investigation (**DGI**) has been prepared by PSM and is attached as **Appendix U**. The geotechnical fieldwork was undertaken in March 2021 and included concrete coring with eight cone penetration testing (**CPT**) locations. A total of thirteen concrete core specimens were collected on site for testing.

6.1.10.1. Existing Environment

In accordance with the 1:100,000 Sydney Geological Map (1991), the geological setting of the site is Quaternary SAND sediments (Qhd): medium to fine grained "marine" sand with podsols.

In relation to inferred sub-surface conditions, the DGI identifies that bedrock was not encountered at the termination depths of between 9.8 metres and 10.9 metres in the CPTs completed, however bedrock is expected to be encountered at >15 metres below ground level.

In relation to groundwater, the DGI identifies that groundwater levels at the site will most likely to be affected by rainfall; during the periods of heavy rainfall, a rise in water table is to be expected and during the periods of drought a lowering of the standing water table is to be expected.

6.1.10.2. Potential Impacts

Based on the detailed geotechnical investigation, the previous historical use, and the development adjacent to the site, the DGI does not find any geotechnical issues that would preclude the site from being developed as a multi-level warehouse.

The DGI recommends that appropriate earthworks specification be prepared for the site and proposed development, and that the proposed placement of fill should be carried out in accordance with that specification. The specification should be developed, appropriately considering the guidelines in AS 3798 (2007), "*Guidelines on earthworks for commercial and residential developments*" and at least the following:

- Stripping requirements: topsoil and vegetation should be stripped prior to any fill being placed.
- Subgrade preparation requirements (if any), including keeping the existing slab.
- Material requirements including a clear definition of suitable and unsuitable material and maximum particle size requirements.
- Where imported material is required, it should conform to the definition of "virgin excavated natural material" (**VENM**) or "excavated natural material" (**ENM**) as defined by the Protection of the Environment Operations.
- Fill placement requirements, including a clear definition of compacted layer thickness: the layer thickness will depend on the available plant. For plant heavier than a 10-tonne roller typically a maximum layer thickness of 300mm is adopted
- Compaction requirements: typically, a dry density ratio of between 98% to 102% standard maximum dry density is adopted.
- Moisture control requirements: typically, a field moisture content of between 2% dry and 2% wet of optimum is adopted.
- Inspection and testing requirements.
- Responsibilities of the contractor.
- Responsibilities of the Geotechnical Inspection and Testing Authority (**GITA**).

In relation to the retention of the existing slab on site, the DGI identifies the following considerations:

- Any soft spot underneath the concrete slab will be difficult to identify. The earthworks contractor shall consider running an 825 compactor over the concrete pavement when proof-rolling; it may break the pavement if the subgrade is "soft" over significant area. This requirement can be included in the Earthworks Specification.
- The warehouse structure layout (in its entirety) should be founded on similar subgrade condition, i.e. either inside or outside the buried slab unless fill is placed on top of the slab. This is to avoid differential settlement due to "hard" and "soft subgrade or design for this.
- Any pipes and terminated existing buried utilities, e.g. stormwater pits, etc., should be removed and backfilled.

The DGI recommends that the imported fill thickness should be a minimum of 1 metre thick new engineered fill to be placed on top of the existing hardstand. The DGI also notes that, as such, footing and services excavation is likely to occur within the imported fill, minimising the disturbance of the existing slab, and reducing the impact of the new warehouse on both hard and soft subgrade.

Acid Sulfate Soil and Salinity

An assessment of acid sulfate soil and salinity has been prepared by PSM and is attached as **Appendix T**.

6.1.10.3. Existing Environment

The assessment identifies that the DPE 1:25,000 acid sulfate soul risk map indicates that the site has a low probability of acid sulfate soul occurrence, with the depth to acid sulfate materials greater than 3 metres below the ground surface.

The site is located within Class 4 according to the RLEP 2012 Acid Sulfate Soils Map where development consent is required for works beyond 2 metres below natural ground surface or works by which the water table is likely to be lowered beyond 2 metres below natural ground surface.

6.1.10.4. Potential Impacts

Given that the excavation works for the proposal are limited to 0.75 metres below the existing slab level for landscaping works along Raymond Avenue with some minor locally deeper works to enable connection to the existing drainage channel, PSM finds that the proposed development has a very low probability of encountering and disturbing acid sulafte souls and that no further actions is required in relation to this issue.

In relation to salinity, the assessment confirms the proposed use of salt tolerant native vegetation for landscaping will minimise the impact of salinity of the environment. The amount of water infiltration on site will be reduced by the development by the sealing of a large portion of the site, the planting of deep-rooted native trees and shrubs, and the proposed installation of a surface drainage system to drain surface water to minimise infiltration.

Given that the excavation works for the proposal are anticipated to be limited to 0.75 metres below the existing slab level for landscaping works along Raymond Avenue with some minor locally deeper works to enable drainage connection, PSM finds that no extra consideration of salinity issues is required for the proposed development other than that already addressed by the Landscaping and Civil Engineering Plans.

Soil Resources and Groundwater Quantity

An assessment of the potential impacts of the proposed development on soil and groundwater resources has been prepared by PSM and is attached at **Appendix S**.

6.1.10.5. Potential Impacts

The PSM assessment finds that the proposed development will have negligible impact on the soil resource on and near the site due to the site and surrounds having been industrial/commercial use for decades. Further, the proposal does not change the existing use of the site, involves the minimal disturbance of the existing ground, and includes the importation of VENM/ENM fill to raise ground levels.

The stormwater system, surface gradients and landscaping requirements have been designed to control surface flows and minimise soil erosion and the effects of soil erosion of adjacent waterways. Further, the majority of the site will be sealed by the proposed development, an appropriate surface runoff collection and disposal system has been included in the civil engineering design (**Appendix R**), and appropriate erosion control is proposed during construction (**Appendix R**).

PSM confirms the proposed groundworks primarily comprise the import of fill which will not lower the existing groundwater table. The excavation works for the proposal are limited to 0.75 metres below the existing slab level for landscaping works along Raymond Avenue with some minor locally deeper works to enable connection to the existing drainage channel. Accordingly, groundwater seepage modelling is not required. As such the proposal is considered acceptable in relation to groundwater resources.

6.1.11. Stormwater and Wastewater

A Civil Engineering Report (**CER**) including Water Cycle Management Strategy, Surface Water Impact Assessment, and Integrated Water Management Plan has been prepared by Costin Roe and is attached as **Appendix R**.

The CER undertakes a civil engineering assessment of the site and provides an assessment of the civil engineering characteristics of the site and technical considerations in relation to earthworks and geotechnical considerations, and Water Cycle Management Strategy (**WCMS**).

6.1.11.1. Existing Environment

To the north-west of the site is an existing Sydney Water Stormwater Drainage Channel and to the south-west is a private detention system. The site currently sheds stormwater as sheet flow to the existing Sydney Stormwater Drainage Channel. The site has minimal existing formal inground drainage systems, with several grated drains discharging directly into the Sydney Water Stormwater Channel.

The site generally grades down from the south-east to the north-west. The highest level is RL 5.84m AHD along the south-eastern boundary. The lowest level on the existing slab is RL 5.69m at the north-west boundary of the site. The lowest level on the overall site is RL 5.50m at the south-west boundary of the site. The level of the frontage at Raymond Avenue is RL 6.86m AHD.

Stormwater

6.1.11.2. Potential Impacts

A WCMS has been developed which seeks to address the competing demands placed on a region's water resources, while optimising the social and economic benefits of development and enhancing and protecting the environmental values of receiving waters. The key WCM targets which have been adopted in the design are summarised in **Table 13** below.

Table 13 WCM summary

Element	Target
Water Quantity	Minimise flooding from increased stormwater runoff
Water Quality	Load-based pollution reduction targets based on an untreated urbanised catchment: ▪ Gross Pollutants 90% ▪ Total Suspended Solids 85% ▪ Total Phosphorus 65% ▪ Total Nitrogen 45%
Flooding	Buildings set 0.5m above the 1% AEP flood level
Water Supply	Reduce Demand on non-potable water uses.
Construction Stormwater Management & Erosion and Sediment Control	A construction stormwater management plan and appropriate associated erosion and sedimentation control measures must be described in the environmental assessment for all stages of construction to mitigate potential impacts to surrounding properties.

A summary of the how each of the WCM objectives will be achieved are described below.

- Stormwater Quantity Management: the intent of the criterion is to reduce the impact of urban development on existing drainage system by limiting post-development discharge within the receiving waters to the pre-development peak, and to ensure no affectation of upstream, downstream or adjacent properties. The site is identified within the RCC *On-site detention Map* within the zone identified as "Onsite detention is generally not required". Attenuation of stormwater runoff from the development is not required. The site discharges to a tidally influenced existing Sydney Water stormwater drainage system located on the land north of the property.
- Stormwater Quality Management: There is a need to target pollutants that are present in stormwater runoff to minimise the adverse impact these pollutants could have on downstream receiving waters. The required pollutant reductions are set out in the CER and MUSIC modelling has been completed to confirm the reduction objectives can be met for the development. A series of stormwater quality improvement devices (**SQIDs**) have been incorporated in the design of the development. The proposed management strategy will include the following measures:
  - Primary treatment of external areas will be made via pit inserts.
  - Tertiary treatment of the development will be made via a proprietary filtration treatment system.
  - Some treatment will also be present by provision of rainwater reuse tanks on development sites through reuse and settlement within the tanks.
- Water Demand Reduction / Rainwater Reuse: Rainwater reuse measures are provided as part of the development design. Rainwater reuse is proposed to reduce demand on non-potable uses by 50-70%. The reduction in demand will target non-potable uses such as toilet flushing and irrigation.

- Stormwater Management During Construction: A construction stormwater management plan and associated erosion and sediment control measures are proposed based on *Landcom Blue Book* and RCC requirements. The management measures take a staged approach from initial site establishment, construction stages and the period between the completion of the proposed infrastructure works and development of site.

The proposed stormwater drainage system for the development will comprise a minor and major system to convey collected stormwater run-off to the legal point of discharge, being the Sydney Water Stormwater Channel to the north-west of the site.

The minor system is to consist of a piped drainage system which has been designed to accommodate the 1 in 20-year ARI storm event (**Q20**). This results in the piped system being able to convey all stormwater runoff up to and including the Q20 event. The major system will be designed to cater for storms up to and including the 1 in 100-year ARI storm event (**Q100**). The major system will employ the use of defined overland flow paths, such as roads and open channels, to safely convey excess run-off from the site.

Construction Soil and Water Management

A Soil and Water Management Plan (**SWMP**) and Erosion and Sediment Control Plan (**ESCP**) are to be implemented to mitigate any sediment impacts in relation to site runoff. The ESCP and draft SWMP are included in the CER. During construction, the ESCP will be in place to ensure the downstream drainage system and receiving waters are protected from sediment laden runoff, particularly in relation to the following key construction activities:

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

The proposed controls for management of erosion and sedimentation during construction of the proposal are identified below.

As such, the proposal is considered acceptable in relation to stormwater and wastewater management.

6.1.11.3. Mitigation Measures

Proposed measures for the management of erosion and sediment control during construction include:

Sediment Fences

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

Stabilised Site Access

Stabilised site access is proposed at the entry to the works area. This will limit the risk of sediment being transported onto Raymond Avenue and other public roads.

Other Management Measures

Other management measures that will be employed include:

- Minimising the extent of disturbed areas across the site at any one time.
- Progressive stabilisation of disturbed areas or previously completed earthworks to suit the proposal once trimming works are complete.
- Regular monitoring and implementation of remedial works to maintain the efficiency of all controls.

6.1.12. Flooding Risk

A Civil Engineering Report (**CER**) including Flood Risk Assessment (**FRA**) has been prepared by Costin Roe and is attached as **Appendix R**. The FRA has been prepared having regard to the relevant RCC flood planning documentation.

6.1.12.1. Existing Environment

The site has minimal existing formal inground drainage systems, with most water sheet-flowing towards the existing Sydney Water Bunnerong Drainage Channel. Overland flow is present between Raymond Avenue and the drainage culvert. The previous building on site discharged its roof water and hardstands directly to the Sydney Water Drainage Channel.

The site is not affected by mainstream flooding associated with Bunnerong Channel in the 1% AEP flood event. A minor overland flow path exists on the north of the site which conveys overland flow from Raymond Avenue to the Bunnerong Channel. The overland flow is noted to be 0.1m in depth and velocity of less than 0.5m/s. The hazard categorisation of the flow path is noted to be H1 - generally safe for vehicles, people and buildings.

6.1.12.2. Potential Impacts

The flood planning level (**FPL**) for the proposed industrial use is to be at or above the 1% AEP (1 in 100-year ARI) flood level plus 0.5m freeboard. The FPL for the site is RL 6.65m AHD. The proposed building level is 7.32m AHD and the lowest level on the site is noted to be RL 6.65m AHD. All levels on the site are noted to be at or higher than the FPL.

The Raymond Avenue to Bunnerong Channel overland flow path is to be maintained so there is no adverse impact on flooding upstream of the site. The design of the levels along the flow route allow for the conveyance route and maintain adequate capacity for the overland flow path. It is estimated the peak 1% AEP flow within the overland flow path is less than 0.5m^3/s, and the conveyance route enables the existing H1 hazard categorisation to be maintained.

Overall, the FRA finds that the flood risk for the development and from the development is considered low to negligible. The FFL of the warehouse is proposed to be constructed 0.67m above the RCC specified flood planning level and the existing overland flow path is maintained as required. Based on the assessment and management strategy proposed, the FRA demonstrates that the development meets current RCC flood policy and has acceptable impacts in relation to flooding and flood safety.

6.1.13. Contamination and Remediation

In relation to contamination and remediation at the site, the following documents have been prepared:

- Detailed Site Investigation (**DSI**), EMM (**Appendix U**)
- Remediation Action Plan (**RAP**), EMM (**Appendix V**)
- Interim Environmental Management Plan (**IEMP**), JBS&G (**Appendix W**)
- Draft Long Term Environmental Management Plan (**LTEMP**), JBS&G (**Appendix X**)
- Remediation Validation Report (**RVR**), EMM (**Appendix Y**).

6.1.13.1. Potential Impacts

In relation to contamination and remediation at the site, the reports prepared by EMM are summarised as follows:

Detailed Site Investigation

- All former buildings had been removed from the site at the time of the investigation. The site was largely covered by a concrete slab with only a small area (6%) of soil exposed along the western boundary of the site adjacent to the stormwater channel.
- Four underground storage tanks (**USTs**) were identified near the western boundary of the site adjacent to the stormwater channel. Oil was observed to be seeping into the canal in the vicinity of the USTs and a sheen was observed on water in the channel.

- Sampling was undertaken from 30 soil bores with the following issues identified:
  - Asbestos was positively identified at one location (south-east corner) although suspected Asbestos containing material (**ACM**) fragments were observed at five other soil bore locations and on the ground surface along the western boundary.
  - The concentration of Benzo(a)pyrene (B(a)P) exceeded ecological assessment at one location and the lead concentration exceeded human health criteria at one location /health criteria. The calculated 95% upper confidence limit (UCL) for both contaminants were less than the applicable criteria.
  - Low concentrations of per and poly fluoroalkyl substances (**PFAS**) were identified in fill and natural soil at a number of locations across the site. The concentrations were significantly less than the adopted health criteria (no ecological criteria was included in the DSI).
- Installation and sampling was undertaken from three monitoring wells installed in the area of the USTs with the results summarised as follows:
  - Contaminants sampled/analysed at all three wells (TRH/BTEX/Metals/PAHs/VOCs) were less than the adopted site assessment criteria;
  - Low concentrations (less than the adopted site criteria) of chlorinated ethenes were identified in groundwater at one location; and
  - One well was analysed for PFAS with concentrations reported below the laboratory limit of reporting.
- The DSI recommended that a management plan be implemented to address asbestos in soils during future construction works, further management (capping) be implemented for the exposed soils on the western boundary and that an RAP be prepared for the USTs.

Remediation Action Plan

- The proposed remediation works were considered Category 2 works under SEPP 55, for which notification was provided to RCC by EMM on 13 August 2020.
- The USTs (and associated infrastructure) and impacted soils/groundwater are identified as requiring remediation to make the site suitable for its zoning (IN1).
- The remedial strategy is excavation and offsite disposal for all underground infrastructure and primary soil contamination except for a tank located directly adjacent to the stormwater channel which would be abandoned in-situ due to structural concerns.
- Validation works following removal of the infrastructure include soil sampling and an assessment of whether further groundwater assessment is required.
- The potential for the presence of asbestos in the area of the USTs is noted in the document and it is indicated that mitigation measures may need to implemented for the works (subject to preparation of detailed remediation/safety plans).
- The proposed remediation area is adjacent to the Sydney Water stormwater drainage canal which is listed on the Sydney Water State Agency Section 170 Heritage and Conservation Register. EMM undertook engagement with Sydney Water, incorporating requirements for the protection of the stormwater channel as required.

Remediation Validation Report

- The remedial works were completed in general accordance with the RAP.
- During the works an additional UST was identified. This additional tank was removed and validated.
- ACM was identified within the base of some of the USTs and in backfill surrounding the tanks. Following removal of the USTs and validation of the tank pits the ACM was placed into the excavation, covered with a marker layer and clean fill.
- All laboratory results for validation samples met the adopted remediation criteria.
- It is noted that some odours (aesthetic criteria exceedance) remained at the base of the excavations at the completion of the works due to limitations on excavation depths/extent imposed by Sydney Water as

a result of the proximity of the canal. The exceedance of aesthetic criteria in this area is not significant with respect to future commercial/industrial use of the site.

- EMM conclude that the residual contamination and potential source of groundwater impact has been significantly reduced so far as is reasonably practicable. The site may be considered suitable for land use purposes under the current land zoning (IN1: General industrial) subject to appropriate recommendations outlined in this report being implemented in accordance with legislative guidelines.
- Due to the presence of ACM, EMM note that an Asbestos Management Plan (**AMP**) will be required for the site to satisfy work health and safety legislation. In addition EMM recommended that a Long Term Environmental Management Plan be prepared and implemented for the site to manage the capped asbestos and residual hydrocarbon contamination.

Following these contamination and remediation assessments, an Interim Environmental Management Plan and Draft Long-term Environmental Management Plan have been prepared by JBS&G.

Interim Environmental Management Plan

The EMP is to ensure that the environmentally impacted soils (including asbestos affected materials) are appropriately managed to ensure protection of human health and the environment prior to redevelopment of the site.

The IEMP will apply in the period prior to site redevelopment. The IEMP is intended to apply to any routine activities within the site which could involve disturbance or exposure of retained contaminated soil beneath the capping and marker layer including underground utility installation, maintenance or removal, or minor excavations. The IEMP will be in place up until redevelopment of the site commences at which time a Construction Environment Management Plan / Asbestos Management Plan will be prepared for implementation during site development.

The provisions of the IEMP are summarised as follows:

- Site personnel or contractors required to conduct intrusive works at the site must be inducted into the EMP and must be aware of their responsibilities with regard to health and safety and protection of the environment;
- A copy of the EMP is to be supplied to all persons conducting intrusive works on the site;
- The integrity of the concrete pavement, capping and marker layers must be maintained by application of the procedures outlined in the EMP; and
- The health and safety and environmental requirements specific to the potential chemical constituent and asbestos hazards within the site as outlined in the EMP must be complied with.

Draft Long Term Environmental Management Plan

The site is considered suitable for use given the presence of an appropriate capping layer across the site to retain the contaminated soils and subject to implementation of the LTEMP.

The LTEMP provides for environmentally impacted soils (including asbestos affected materials) to be appropriately managed to ensure continued protection of human health for future site workers, occupiers, visitors and contractors engaged to undertake works within the site. The requirements of the LTEMP are intended to apply to any routine activities which could involve disturbance or exposure of retained contaminated soil beneath the capping and marker layer including underground utility installation, maintenance or removal, or excavations. A specific management plan should be prepared if major works are proposed within the area of the encapsulated contaminated soils.

The LTEMP sets out a contaminated soil and asbestos management strategy, including management measures related to shallow intrusive works (disturbance of the capping pavement or soils) and deep intrusive works (breach of the capping pavement or the marker layer, generally comprising excavations undertaken beyond a depth of 0.3 metres below the ground surface in unpaved areas). The LTEMP also sets out provisions for the reinstatement of capping, requirements for those working with asbestos impacted material, requirements if groundwater is encountered, soil management, dust management, off-site disposal and waste management, an unexpected finds protocol, and emergency preparedness and response.

SEPP 55 Assessment

In accordance with the contamination and remediation considerations required for development under SEPP 55, the above reports prepared by EMM and JBS&G demonstrate that:

- it has been considered whether the land is contaminated;
- if the land is contaminated, the land has been made suitable, after remediation, for the purpose for which the development is proposed to be carried out; and
- if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, the land has been remediated before the land is used for that purpose.

Subject to the implementation of the IEMP and LTEMP, the site is considered suitable for the proposed development.

6.1.14. Waste Management

A Waste Management Plan (**WMP**) has been prepared by SLR and is provided in **Appendix Z**. The WMP identifies all potential waste likely to be generated by the proposal during the site preparation, construction and operational phases, including how waste would be handled, processed and disposed of, or re-used or recycled. The objective of the WMP is to encourage the minimisation of waste production and maximisation of resource recovery.

6.1.14.1. Potential Impacts

The WMP has been prepared in line with the waste management hierarchy which comprises the following principles:

- Waste avoidance, prevention or reduction of waste generation. Achievable through better design and purchasing choices.
- Waste reuse, reuse without substantially changing the form of the waste.
- Waste recycling, treatment of waste that is no longer usable in its current form to produce new products.
- Energy recovery, processing of residual waste materials to recover energy.
- Waste treatment. Reduce potential environmental, health and safety risks.
- Waste disposal, in a manner that causes least harm to the natural environment.

Construction Waste

The site preparation and construction of the development is likely to generate the following broad waste streams: site clearance wastes, construction wastes, plant maintenance waste, packaging wastes, and work compound waste from on-site employees. The quantities of demolition waste for this development are estimated to be minimal as the existing concrete slab will generally remain in place.

Table 14 Estimated types and quantities of construction waste

Project Area	**Waste types and quantities (m^3)**						
	Timber	Concrete	Bricks	Gyprock	Sand or soil	Metal	Other
Warehouse areas	4	37	29	8	85	11	9
Office areas	9	33	15	15	15	5	9
Hardstand area	-	138	-	-	64	20	36
Carpark	-	30	-	-	14	4	8

Project Area	Waste types and quantities (m^3)						
	Timber	Concrete	Bricks	Gyprock	Sand or soil	Metal	Other
Total	13	237	44	23	178	40	62

Waste impacts during the construction phase will be minimal as no excavation or demolition works are proposed. Effective management of construction materials and construction waste, including options for reuse and recycling where applicable and practical, will be conducted. Only wastes that cannot be cost effectively reused or recycled are to be sent not landfill or appropriate disposal facilities.

Waste materials produced from demolition and construction activities are to be separated at the source and stored separately on-site before transporting to a waste facility. Waste storage areas will be accessible and allow sufficient space for storage and servicing requirements. The storage areas will also be flexible to cater for change of use throughout the project. Where space is restricted, dedicated stockpile areas will be delineated on the site, with regular transfers to dedicated skip bins for sorting.

Any contamination encountered on site during construction will be managed in accordance with the Contaminated Soil and Asbestos Management Strategy outlined in the Interim Environmental Management Plan and Draft Long Term Environmental Management Plan. The management pathway is based on control of potential hazards and minimising risk.

All staff, including sub-contractors and labourers, employed during the site preparation and construction phases of the development will undergo induction training regarding waste management.

Operational Waste

The operation of the development is expected to generate the following broad waste streams:

- Domestic wastes generated by employees, including food wastes;
- Bulk packaging wastes, including polystyrene, plastic wrapping and carboard boxes;
- Office waste;
- Garden organic waste from landscaped areas;
- Bulky waste items such as furniture and e-waste; and
- Stores, plant and general maintenance wastes.

The predicted waste generation during the operation of the facility is outlined in **Table 15** below.

Table 15 Estimated quantities of operational general waste and recycling

Proposal	Location	Area (m^2)	General Waste (L/week)	Recycling (L/week)
Warehouse Tenancy 1	Warehouse	4,558	9,572	9,572
	Office	441	309	772
	Total	4,999	9,881	10,344
Warehouse Tenancy 2	Warehouse	4,182	8,782	8,782
	Office	446	312	781
	Total	4,628	9,094	9,563
	Warehouse	4,595	9,650	9,650

Proposal	Location	Area (m^2)	General Waste (L/week)	Recycling (L/week)
Warehouse Tenancy 3	Office	441	309	772
	Total	5,036	9,958	10,421
Warehouse Tenancy 4	Warehouse	4,538	9,530	9,530
	Office	444	311	777
	Total	4,982	9,841	10,307

Proposed waste minimisation measures for the proposal include:

- Participating in take-back services to suppliers to reduce waste further along the supply chain;
- Avoiding printing where possible;
- Review of packaging design to reduce waste but maintain 'fit for purpose';
- Providing ceramic cups, mugs, crockery and cutlery rather than disposable items;
- Purchasing consumables in bulk to avoid unnecessary packaging;
- Presenting all waste reduction initiatives to staff as part of their induction program; and
- Investigating leased office equipment and machinery rather than purchase and disposal.

The size of the proposed waste storage areas has been calculated in accordance with Randwick Council's Waste Guidelines. Dedicated waste storage areas are location on the northern and southern sides at the western end of the ground floor and Level one breezeways.

The design of the waste storage areas has been integrated into the architectural design to minimise any impacts. The waste storage areas of are sufficient size and are accessible to allow collection by the required waste collection vehicles, in accordance with the RDCP 2013. The waste storage areas will include clear signage for waste management procedures.

6.1.15. Aboriginal Cultural Heritage

An Aboriginal Cultural Heritage Assessment (**ACHA**) has been undertaken by Urbis and a draft Aboriginal Cultural Heritage Assessment Report (**ACHAR**) is attached as **Appendix AA**.

At the time of writing, consultation with the Aboriginal community has been completed up to and including Stage 3 (gathering information). It is anticipated that the draft ACHA report will be issued to Registered Aboriginal Parties (**RAPs**) early March 2022 and the ACHA report will be finalised by early April 2022.

The ACHA has been undertaken to investigate whether development of the site will harm Aboriginal objects or places that may exist within the site area and determine whether the subject area presents any Aboriginal archaeological and heritage constraints. The current draft ACHA report presents the results of the ACHA.

The ACHA was undertaken in accordance with Part 6 of the *National Parks and Wildlife Act 1974* and Part 5 of the *National Parks and Wildlife Regulation 2019*. The ACHA was further conducted in accordance with the following guidelines:

- *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (Department of Environment, Climate Change and Water.
- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (Office of Environment and Heritage 2011).
- *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b).

- *The Australia ICOMOS Charter for Places of Cultural Significance, The Burra Charter, 2013*.

6.1.15.1. Existing Environment

The ACHAR assesses the existing site context including search results from the Aboriginal Heritage Information Management System (**AHIMS**) and considers previous archaeological investigations relevant to the site.

The AHIMS search identified no Aboriginal sites and no Aboriginal places within the subject area. The nearest registered Aboriginal objects located approximately 1km to the south-east of the subject area. In the broader search area, a total of 14 Aboriginal objects and no Aboriginal places are registered.

The following conclusions are drawn from the archaeological background information, including AHIMS results and pertinent regional archaeological investigations:

- No Aboriginal objects or Aboriginal places are registered within the site area.
- No previous Aboriginal archaeological investigations have been identified that directly address the site area.
- Previous archaeological investigations from similar contexts near to the site identified the potential for archaeological resources dating to the Pleistocene within intact natural soils below modern fill layers.

The draft ACHAR also undertakes an assessment of the archaeological and environmental contexts of site and finds that:

- The site is located within 200m of a former natural waterway, now canalised as Bunnerong Stormwater Channel No. 11, which is an archaeologically sensitive landscape feature.
- Historical activities, including land clearance, construction and demolition of buildings and utilisation of the subject area for industrial purposes, are determined to have caused a high level of ground disturbance across the subject area.
- Geotechnical findings confirm the impact of historical activities on the soil profile, with a minimum inferred disturbance depth based on core penetration testing of 0.8m below the existing ground surface.
- Geotechnical findings further indicate the presence of an intact natural sand body below approximately 0.8m, likely the Tuggerah soil landscape, which is an archaeologically sensitive landform.
- There is nil to low potential for Aboriginal sites within the disturbed soil layers to depths of approximately 0.8m below the existing ground surface.

6.1.15.2. Potential Impacts

The ACHA utilises a predictive model to estimate the nature and distribution of evidence of Aboriginal land use at the site. The predictive model considers the variables that may influence the location, distribution and density of sites, features or artefacts within the area. Variables relate to the environment and topography, such as soils, landscape features, slope, landform and cultural resources.

The likelihood of the occurrence of Aboriginal site types at the site as identified by the draft ACHAR is shown in **Table 17** below. It is concluded that the site has moderate archaeological potential for artefact scatters / campsites, burials, isolated finds, middens and potential archaeological deposits (**PADS**) dating to the Pleistocene within intact natural soil at depths exceeding approximately 0.8m below the existing ground surface.

Table 16 Predictive model for assessment of archaeological potential

Site Type	Assessment	Potential
Art	The site does not include any visible sandstone outcrops or rock overhangs that would be indicative of the potential for rock art. The likelihood of any concealed rock overhangs or sandstone outcrops	Nil

Site Type	Assessment	Potential
	being present within the subject area is considered to be negligible.	
Artefact Scatters / Campsites	The site is located within 200m of a former natural waterway and within a sand body, likely the Tuggerah soil landscape. A high level of historical ground disturbance across the entire site significantly reduces the potential for artefact scatters / campsites to a depth of approximately 0.8 to 1.4 m below the existing ground surface. However, there is moderate potential for the presence of artefact scatters / campsites within deeper intact natural soils.	Moderate
Bora / Ceremonial	The site is located within 200m of a former natural waterway and within a sand body, likely the Tuggerah soil landscape. However, due to the high level of historical ground disturbance across the entire site area and susceptibility of bora / ceremonial sites to disturbance, the likelihood of such sites being retained is considered to be low.	Low
Burial	The site is located within 200m of a former natural waterway and within a sand body, likely the Tuggerah soil landscape. A high level of historical ground disturbance across the entire site significantly reduces the potential for burials to a depth of approximately 0.8 to 1.4 m below the existing ground surface. However, there is moderate potential for the presence of burials within deeper intact natural soils.	Moderate
Contact site	The location of the site within an area of early European settlement is indicative of the potential for contact sites. However, a high level of historical ground disturbance across the entire site significantly reduces the potential for contact sites to be retained.	Low
Grinding Grooves	The site does not include any visible sandstone outcrops that would be indicative of the potential for grinding grooves. The likelihood of any concealed sandstone outcrops being present within the site area is considered to be negligible.	Nil
Isolated Finds	The site is located within 200m of a former natural waterway and within a sand body, likely the Tuggerah soil landscape. A high level of historical ground disturbance across the entire site significantly reduces the potential for isolated finds to a depth of approximately 0.8 to 1.4m below the existing ground surface. However, there is moderate potential for the	Moderate

Site Type	Assessment	Potential
	presence of isolated finds within deeper intact natural soils.	
Midden	The site is located within 200m of a former natural waterway and within a sand body, likely the Tuggerah soil landscape. A high level of historical ground disturbance across the entire site significantly reduces the potential for middens to a depth of approximately 0.8 to 1.4 m below the existing ground surface. However, there is moderate potential for the presence of middens within deeper intact natural soils.	Moderate
Modified Trees	Historical development of the site has resulted in clearance of all vegetation, removing any potential for the presence of modified trees.	Nil
PAD	The site is located within 200m of a former natural waterway and within a sand body, likely the Tuggerah soil landscape. A high level of historical ground disturbance across the entire site significantly reduces the potential for archaeological deposits to a depth of approximately 0.8 to 1.4m below the existing ground surface. However, there is moderate potential for the presence of archaeological deposits within deeper intact natural soils.	Moderate
Shelters	The site does not include any rock overhangs that would be indicative of the potential for shelters. The likelihood of any concealed rock overhangs being present within the subject area is considered to be negligible.	Nil

The ACHA seeks to undertake an assessment and discussion of the cultural significance of the site, in consultation with the RAPs. The assessment takes into consideration the social, cultural, historic, scientific (archaeological) and aesthetic values of the site area. As the cultural significance assessment is undertaken in consultation with the RAPs, this will be detailed in the final ACHAR once consultation with the RAPs has been completed.

The ACHA also undertakes an assessment of the potential impact of the proposed development on any Aboriginal objects and/or Aboriginal places within the site areas and the identifies possible strategies for avoiding or minimising harm to those Aboriginal objects and/or Aboriginal places. The potential harm to Aboriginal cultural heritage arising from the proposed works is identified as relating to the sinking of soil mix pile foundations below the existing slabs (if required) and the landscaping of areas to the front and south-east of the subject area.

The desktop assessment undertaken as part of the draft ACHAR has determined that there are no known Aboriginal objects or Aboriginal places within the subject area. The archaeological potential of the site has been assessed to be moderate for artefact scatters / campsites, burials, isolated finds, middens and PADS within intact natural soil at depths exceeding 0.8m below the existing ground surface. As such, the ACHA finds that there is moderate potential for direct harm to Aboriginal objects due to the proposed works.

The draft ACHAR notes that re-assessment of the potential for harm to significant Aboriginal objects will be undertaken based on information received from RAPs during consultation and the visual inspection of the site. An updated assessment will be detailed in the final ACHAR. On this basis the final ACHAR will include

recommendations in relation to any measures required to avoid and minimise harm and conserve any significant Aboriginal objects and/or Aboriginal places, along with their cultural heritage values.

The draft ACHAR makes the following recommendations based on the assessment undertaken:

- Once design details for ground impacting works are finalised an appropriately qualified archaeologist should review the design details to determine where natural soil likely to be impacted (e.g. where ground disturbance exceeds 0.8m below the existing ground surface).
- In the event that any works within the site area are likely to impact natural soil an archaeological excavation program should be undertaken to determine whether any archaeological resources are likely to be harmed by the works.
- An Archaeological Research Design (**ARD**) and Excavation Methodology (**EM**) should be developed to answer specific questions in relation to any Aboriginal archaeological resource that might be encountered and how Aboriginal people might have used the subject area in the past.
- A protocol for the handling of any Aboriginal objects and archaeological resources that might be uncovered during the monitoring and the archaeological test excavation should be established as part of the ARD and EM.
- Proposed Care and Control of any recovered Aboriginal objects should be developed in consultation with the Registered Aboriginal Parties.
- The archaeological excavation should be localised to a sample of areas of impact to avoid unnecessary additional impacts to Aboriginal objects and to minimise damage to the existing slab.
- The archaeological excavation should be undertaken with the participation of nominated Aboriginal RAPs and appropriately qualified archaeologists.
- An Archaeological Technical Report and Post Analysis should be prepared following completion of the archaeological excavation program, with further recommendations based on the findings of the test excavation, including in relation to any Aboriginal objects identified.
- In areas where works are deemed unlikely to impact natural soil, the development may proceed with caution, subject to archaeological chance finds and human remains procedures being implemented and followed.

6.1.15.3. Mitigation Measures

Archaeological Finds Procedure

Should any archaeological deposits be uncovered during any site works, the following steps must be followed:

1. All works within the vicinity of the find must immediately stop. The find must not be moved ‘out of the way’ without assessment.
2. The site supervisor or another nominated site representative must contact either the project archaeologist (if relevant) or Heritage NSW (Enviroline 131 555) to contact a suitably qualified archaeologist.
3. The nominated archaeologist must examine the find, provide a preliminary assessment of significance, record the item and decide on appropriate management measures. Such management may require further consultation with Heritage NSW, preparation of a research design and archaeological investigation/salvage methodology and registration of the find with the Aboriginal Heritage Information Management System.
4. Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required and further archaeological investigation undertaken.
5. Reporting may need to be prepared regarding the find and approved management strategies.
6. Works in the vicinity of the find can only recommence upon receipt of approval from Heritage NSW.

Human Remains Procedure

In the unlikely event that human remains are uncovered during the proposed works, the following steps must be followed:

1. All works within the vicinity of the find must immediately stop. The find must be cordoned-off and signage installed to avoid accidental impact.
2. The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW (Enviroline 131 555).
3. The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.
4. Management recommendations are to be formulated by the NSW Police, Heritage NSW and site representatives.
5. Works are not to recommence until the find has been appropriately managed.

6.1.16. Environmental Heritage

A Heritage Impact Statement (**HIS**) has been prepared by Urbis and is attached as **Appendix BB**.

6.1.16.1. Existing Environment

The site is not a listed heritage item. The site however adjoins the Bunnerong Stormwater Channel No 11, which is identified as a heritage item on Sydney Water's Section 170 Heritage & Conservation Register (item no. 4570016). This heritage item is the storm water canal which extends along the subject area's north-western boundary.

The stormwater channel is not visible from the public domain (Raymond Avenue), as it passes behind adjacent warehouse buildings. The site is not located within the vicinity of any heritage items listed on an Environmental Planning Instrument or the NSW State Heritage Register.

6.1.16.2. Potential Impacts

Built heritage

The HIS undertakes an assessment of heritage significance and finds that the site does not need the requisite threshold for heritage listing. In relation to the Bunnerong Stormwater Channel No 11, the Sydney Water's Section 170 Heritage and Conservation Register notes the following statement of significance:

> *The Bunnerong stormwater drainage system is representative of stormwater channels in the Sydney Water Corporation system constructed by the PWD between 1930-1935 as part of the Unemployment Relief Program. The Depression period saw one of the greatest expansions in Sydney's stormwater system due to the Prevention and Relief of Unemployment Act 1930.*
>
> *This Act enabled a workforce to be utilised at little cost to the MWS&D Board. The implementation of this Act led to the Minister for Public Works authorising the construction of many new stormwater channels within the Board's area of operations. Other examples of channels constructed during this period include Birds Gully, Haslam's Creek, Moore Park, Centennial Park to Park Road and Queens Park.*
>
> *Tremendous benefits followed this action by the State Government and large areas of inner and suburban Sydney gained widespread improvements in their stormwater drainage systems. The operational curtilage of the stormwater channel includes the channel bed, walls and coping. The visual curtilage will vary along the length of the channel depending on the surrounding land uses.*

The HIS undertakes as assessment of the potential impacts of the proposal of the Bunnerong Stormwater Channel No 11. The proposal requires minor works to the Bunnerong Channel to facilitate stormwater discharge into the asset, mid-way along the north-western boundary of the site. The new stormwater connection point is to be designed similar to the existing connection point at the northern end of the site. The HIS finds that the new connection point and associated physical impacts maintain the original use and intended purpose of the channel, ensuring its ongoing viability as part of Sydney Water infrastructure. Physical impacts to the channel will be undertaken with the minimum required intervention and made good where necessary. Overall the HIS finds that the minor works required to facilitate stormwater drainage to the channel are considered to have no detrimental heritage impact whilst ensuring the continued function of the Bunnreong Channel. The new connection point does not impact on the historical significance of the Bunnerong Channel and as such the built heritage impacts of the proposal are considered to be acceptable.

Archaeological heritage

The HIS undertakes an assessment of the historical archaeological potential of the site. The HIS identifies that all early buildings and other infrastructure on the site were demolished prior to the construction of the existing hardstand and prior warehouse by 1955.

The remains of the early buildings on the site, infrastructure and casual finds associated with the site's early use are likely to have been destroyed by the subsequent development of the site to build the warehouse and hardstand. The geotechnical investigation undertaken at the site (**Appendix U**) confirms the high level of disturbance, with a disturbed fill layer to a minimum depth of 0.8 to 1.4 metres below the existing ground surface.

The depth of ground disturbance within the site area significantly reduces the likelihood of historical archaeological remains being retained. Based on the high level of ground disturbance associated with the construction of the extant buildings and infrastructure, the HIS finds the site as having low historical archaeological potential.

It is recommended that no further investigation historical archaeological investigation need be undertaken prior to construction works commencing and that the development may proceed with caution, subject to archaeological chance finds and human remains procedures being implemented.

6.1.16.3. Mitigation Measures

Archaeological Finds Procedure

Should any archaeological deposits be uncovered during any site works, the following steps must be followed:

1. All works within the vicinity of the find must immediately stop. The find must not be moved 'out of the way' without assessment.
2. The site supervisor or another nominated site representative must contact either the project archaeologist (if relevant) or Heritage NSW (Enviroline 131 555) to contact a suitably qualified archaeologist.
3. The nominated archaeologist must examine the find, provide a preliminary assessment of significance, record the item and decide on appropriate management measures. Such management may require further consultation with Heritage NSW and preparation of a research design and archaeological investigation/salvage methodology.
4. Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required and further archaeological investigation undertaken.
5. Reporting may need to be prepared regarding the find and approved management strategies.
6. Works in the vicinity of the find can only recommence upon receipt of approval from Heritage NSW.

Human Remains Procedure

In the unlikely event that human remains are uncovered during the proposed works, the following steps must be followed:

1. All works within the vicinity of the find must immediately stop. The find must be cordoned-off and signage installed to avoid accidental impact.
2. The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW (Enviroline 131 555).
3. The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.
4. Management recommendations are to be formulated by the NSW Police, Heritage NSW and site representatives.
5. Works are not to recommence until the find has been appropriately managed.

6.1.17. Social Impact

A Social Impact Assessment (SIA) has been prepared by Urbis as it attached at **Appendix CC**. The SIA identifies and analyses the potential positive and negative social impacts associated with the proposal.

6.1.17.1. Existing Environment

The SIA identifies a social baseline of the study area including the site's locality, social context, demographic characteristics, engagement outcomes and areas of social influence. The SIA includes a community profile identifying the demographic and social characteristics of the proposal's likely area of social influence. The SIA finds the key characteristics of the Matraville community as:

- An older adult population
- A higher proportion of residents who identify as Aboriginal and Torres Strait Islander
- Lower rates of cultural diversity
- High socio-economic advantage
- Mix of employment industries
- Broader LGA growth over the next 10 year period
- Low rates of crime.

6.1.17.2. Potential Impacts

The SIA assesses the direct and indirect social impacts on the existing community and identified stakeholder groups as a result of the proposal. The key residual social impacts (considering mitigation measures proposed) identified are summarised in **Table 18** below.

Table 17 Residual social impact summary

Social Impact				**Residual Impact Summary**		
	Description of impact	Impacted groups	Social impact category	Likelihood	Magnitude	Resultant impact
Availability of local jobs	Increased employment opportunities within industrial lands	Randwick LGA and Matraville residents	▪ Livelihoods ▪ Way of life	Likely	Moderate	High positive
Noise and health	Potential impact to residential amenity and human health from increased noise and dust emissions	Residents and businesses on streets immediately surrounding the site	▪ Health and wellbeing ▪ Surroundings	Unlikely	Minimal - Minor	Low negative

Social Impact				Residual Impact Summary		
	Description of impact	Impacted groups	Social impact category	Likelihood	Magnitude	Resultant impact
Potential change to the visual landscape	Potential change to views and visual landscape of the site and surrounds	Residents and businesses on streets immediately surrounding the site on Beauchamp Road, Raymond Avenue, McCauley Street and Australia Avenue	▪ Surroundings	Likely	Minimal	Low positive
Potential increase in traffic	Potential increase in traffic generation and network delays during construction and operation of the proposal	Residents and businesses on streets immediately surrounding the site and Matraville residents	▪ Accessibility ▪ Way of life	Unlikely	Minimal	Low - neutral

The key social impacts as a result of the proposal are described as follows:

- Availability of local jobs: the proposal will contribute to the generation of new jobs in an industry which already employs many local residents. The creation of new, ongoing jobs in the industrial sector provides a high positive social impact to the community.
- Noise and health: it is likely the residential community immediately surrounding the site will not experience significant noise or amenity impacts associated with the construction and operation of the proposal on the basis of the recommended mitigation measures being implemented (NIA, **Appendix P**). On this basis, the construction and operation of the proposal are unlikely to generate any significant health impacts and will have a low negative impact on the community.
- Potential change to the visual landscape: Based on the findings of the VIA (**Appendix J**), the proposal will likely have a low positive impact on the community by improving the visual amenity of the site.
- Potential increase in traffic: Based on the findings of the TA (**Appendix K**), the construction and operation of the proposal can be accommodated adequately by the existing road network and will not generate any significant traffic impacts. The proposal is therefore expected to have a neutral impact on the community.

Overall, the SIA finds that the proposal will have a low positive impact on the local community, largely influenced by the creation of new, local jobs in the area and the potential improvement to visual amenity.

6.1.18. Infrastructure Requirements and Utilities

A Service Infrastructure Assessment has been prepared by Landpartners and is attached as **Appendix DD**.

6.1.18.1. Existing Environment

The Service Infrastructure Assessment identifies the service authorities providing infrastructure to the site are:

- Potable Water & Waste Water Infrastructure – Sydney Water
- Electrical Infrastructure – Ausgrid
- Telecommunications Infrastructure – NBN Co
- Gas Infrastructure - Jemena

6.1.18.2. Potential Impacts

The Service Infrastructure Assessment finds that the site is capable of adequately servicing the proposed development as summarised below. In relation to infrastructure staging and delivery, the Service Infrastructure Assessment sets out that all required services are proposed to be delivered through the respective service utility organisations asset creation pathways with the assets to be proponent funded. The required infrastructure will be coordinated with the project team to ensure the assets are constructed and commissioned prior to Occupation Certificate approval.

Potable Water

Potable water reticulation system exists adjacent to the site. A 100mm water main provides frontage to the site for connection of potable water supply. This main is then connected to a further 100mm and 150mm main in McCauley Street. Pressure and flow response indicates reasonable flow and adequate pressure from existing 100mm water main in Raymond Ave.

Waste Water

The site is served by a 225mm sewer main adjacent to the south-west corner of the site. Adequate waste water capacity exists to serve the proposed development.

Electricity

The site is currently serviced by an existing Ausgrid padmount substation established onsite and high voltage feeder (within easement) from McCauley Street. Electrical demand has been calculated as 1.0MVa. Applications for decommissioning the existing padmount substation and provision of a new padmount substation are being undertaken with Ausgrid by the project electrical consultant.

Telco

NBN is the network provider for the area and has established underground fibre optic cables within Raymond Avenue.

Gas

Jemena have a 1,050kPa gas reticulation main in Raymond Avenue immediately along the frontage of the site. This main is available for connection.

7. JUSTIFICATION OF THE PROJECT

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

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

7.1. PROJECT DESIGN

The design of the proposal has been carefully considered to ensure any potential impacts of the development are minimised. The proposal seeks to meet the objectives of the project through enabling industrial uses and employment opportunities to be delivered on site. The proposal seeks to deliver an innovative and modern employment-generating development on an existing, vacant industrial site.

The layout and design of the proposal has been developed to minimise impacts on the public domain and maximise the relationship of the building to the streetscape, providing enhancements to the local context. The proposal seeks to make efficient use of the site to deliver employment opportunities in both the short and long-term.

The proposal includes extensive uplift to the site in relation to landscaping and planting. Where mitigation measures are proposed these will ensure the proposal can be constructed and operated without any unacceptable economic, social or environmental impacts.

7.2. STRATEGIC CONTEXT

The proposal is consistent with State and local strategic planning policies. The site is highly suitable for the proposed development being a vacant, designated industrial site. The proposal will deliver additional industrial floorspace in a designated industrial employment zone to meet growth and demand.

The generation of additional employment for the Eastern City Region will also contribute to the 30-minute city vision set in the Region Plan. The proposal will provide a range of employment opportunities of benefit to the local community and broader Sydney region.

7.3. STATUTORY CONTEXT

The relevant State and local environmental planning instruments are listed in **Section 4** and assessed in **Appendix C**. The assessment concludes that the proposal complies with the relevant provisions within the relevant instruments as summarised below:

- The proposed development has been assessed and designed in respect to the relevant objects of the EP&A Act as defined in Section 1.3 the Act and addressed in **Appendix C**.
- This EIS has been prepared in accordance with the SEARs as required by Schedule 2 of the EP&A Regulations.
- Consideration is given to the relevant matters for consideration as required under the BC Act and the SSD is supported by a BDAR waiver accordingly.
- This SSDA pathway has been undertaken in accordance with the SRD SEPP as the proposed development is classified as SSD.
- Concurrence from TfNSW will be required as per the ISEPP for ‘traffic generating development’.
- The proposal complies with the relevant provisions under the Three Ports SEPP as detailed in **Appendix C.** The proposed development is consistent with the objectives of the IN1 zone.
- The proposed development has been assessed in accordance with SEPP 55 and SEPP 64. The proposed development complies with the relevant clauses of these SEPPs.
- The proposal accords with the relevant provisions of the RDCP 2013 as outlined in **Appendix C**.

7.4. COMMUNITY VIEWS

As set out in **Section 5**, feedback received during the stakeholder engagement has informed the development of the design of the proposal as well as the preparation of the EIS.

Consultation feedback received during the finalisation and assessment of the application will continue to be considered.

7.5. LIKELY IMPACTS OF THE PROPOSAL

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

- **Natural Environment**: the proposal addresses the principles of ecologically sustainable development (ESD) in accordance with the requirements of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation) and as outlined below:
  - Precautionary principle: the precautionary principle relates to uncertainty around potential environmental impacts and where a threat of serious or irreversible environmental damage exists, lack of scientific certainty should not be a reason for preventing measures to prevent environmental degradation. The development as modified will not result in any threat of serious environmental damage or degradation.
  - Intergenerational equity: the needs of future generations are considered in decision making and that environmental values are maintained or improved for the benefit of future generations. The development represents sustainable development, making best use of a brownfield site in an accessible location. The development will not have any unacceptable impacts on the environment.
  - Conservation of biological diversity and ecological integrity: the proposal will not have any unacceptable impacts on the conservation of biological diversity and ecological integrity. The proposal includes landscaped setbacks and planting including native species planting.
  - Improved valuation, pricing and incentive mechanisms: this requires the holistic consideration of environmental resources that may be affected as a result of the development including air, water and the biological realm. It places a high importance on the economic cost to environmental impacts and places a value on waste generation and environmental degradation. The development will not have any unacceptable environmental impacts in relation to air quality, water quality or waste management. The effects of the development will be acceptable and managed accordingly by the proposed mitigation measures as required.
  - Overall, the proposal will not have any unacceptable impacts on the natural environment. The Sustainability Management Plan (**Appendix M**) identifies a number of different ecological sustainability initiatives including energy savings, energy efficiency and waste minimisation.
- **Built Environment**: the proposal has been assessed in relation to the following key built environment impacts:
  - Visual Impacts: As set out in **Section 6** and the VIA, the proposed development is expected to generally create minor visual impacts for people who will experience views of the development, including the residential areas within Matraville.
  - Traffic Impacts: As set out in **Section 6** and the TA, the local road network will continue to perform at an acceptable level of service as a result of the proposed development and the proposal is not expected to result in any adverse impacts on the surrounding road network during operation.
  - Trees and Landscaping: As set out in **Section 6**, the AIA and Landscape Plans, the proposal includes a high level of indigenous species planting and large canopy landscaping across the site. The removal of the Hills Weeping Fig is mitigated by the proposed landscaping design.
  - Air Quality: As set out in **Section 6** and the AQIA, the operation of the proposal would result in the achievement of all air quality criteria. Accounting for the background air quality conditions, and adopting worst-case assumptions in relation to truck idling, the proposal will not have any unacceptable air quality impacts including in relation to nearby residential receivers.

  - Noise and Vibration: As set out in **Section 6** and the NIA, the operation of the proposal is anticipated to comply with the required noise levels at all surrounding receivers including nearby residential receivers. The proposal is found to have acceptable impacts in relation to noise and vibration, including during operations at night.

- **Social**: The proposal will have positive social impacts by enabling employment generating uses to be delivered on site in the short-term, providing local employment opportunities both in the construction and operational phases.
- **Economic**: The proposal will have positive economic impacts through enabling the delivery of operational industrial uses on site which will result in investment and economic benefit for Campbelltown as well as the wider region.

The potential impacts can be mitigated, minimised or managed through the measures discussed in detail within **Section 6** and as summarised in **Appendix D** to this EIS.

7.6. SUITABILITY OF THE SITE

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

- The warehouse and distribution centre use in permissible within the IN1 zone and in accordance with the zone objectives including to provide a wide range of industrial and warehouse land uses; to encourage employment opportunities; and to minimise any adverse effect of industry on other land uses.
- The development is compliant with the Three Ports SEPP and compliant with the RDCP 2013 including in relation to acoustic amenity, built form and setbacks, car parking and landscaping.
- The site is located within an existing industrial area and the character and scale of the development is in keeping with the site's context, without having any unacceptable impacts on residential amenity.
- The site is highly accessible to both the transport and regional freight network and makes use of a vacant brownfield site to deliver sustainable development.

7.7. PUBLIC INTEREST

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

- The proposal is consistent with relevant State and local strategic plans and complies with the relevant State and local planning controls.
- No adverse environmental, social or economic impacts will result from the proposal.
- The proposal will provide 186 jobs during the construction phase, and up to 210 jobs once complete and fully operational. The proposal will stimulate local investment and contribute significant economic output and value add to the economy each year. This project is fully funded and 'shovel ready' for commencement of construction as soon as possible next year.
- The issues identified during the stakeholder engagement have been addressed through the development of the design of the proposal and the assessment of the impacts of the project.

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

8. DISCLAIMER

This report is dated 11 March 2022 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 Hale Capital Partners **(Instructing Party)** for the purpose of Environmental Impact Statement **(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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Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

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

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