

ENVIRONMENTAL IMPACT STATEMENT

Multi-Storey Industrial Warehouse
1-3 Burrows Road, St Peters

Prepared for

GOODMAN PROPERTY SERVICES (AUSTRALIA) PTY LTD

November 2022



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Project Code	P0034479
Report Number	Final for Lodgement – 2 November 2022

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

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CONTENTS

Signed Declaration	7
Glossary and Abbreviations	9
Summary	12
Feasible Alternatives.....	13
The Proposal.....	13
Consultation	14
Justification of the Project.....	14
1. Introduction	17
1.1. Purpose of Report.....	17
1.2. Applicant Details	17
1.3. Project Description	17
1.4. Project Background and Planning History	20
1.4.1. Planning Proposal – PP-2020-298	20
1.4.2. Competitive Design Process and Design Integrity	20
2. Strategic Context.....	22
2.1. Project Justification	22
2.1.1. Greater Sydney Region Plan: A Metropolis of Three Cities	22
2.1.2. Our Greater Sydney 2056: Eastern City District Plan	22
2.1.3. City of Sydney Local Strategic Planning Statement.....	23
2.1.4. Better Placed	23
2.1.5. Sustainable Sydney 2030-2050: Continuing the Vision	24
2.1.6. City of Sydney Employment Lands Strategy 2014-2019.....	24
2.2. Key Features of Site and Surrounds.....	25
2.3. Future Projects Proximate to the Site	30
2.4. Feasible Alternatives.....	30
3. Project Description	34
3.1. Project Overview.....	34
3.2. Detailed Description	36
3.2.1. Project Area	36
3.2.2. Physical Layout and Design	37
3.2.3. Uses and Activities	45
3.2.4. Development Timing.....	47
4. Statutory Context	49
4.1. Statutory Requirements	49
4.2. Pre-Conditions	52
4.3. Mandatory Considerations	54
5. Community Enagagement.....	58
5.1. Engagement Carried out.....	58
5.2. Community Views	59
5.3. Engagement to be Carried out.....	63
6. Assessment of Impacts	64
6.1. Detailed Assessment Impacts	64
6.1.1. Built Form, Design Quality and Urban Design	64
6.1.2. Visual Impact	69
6.1.3. Traffic, Transport and Accessibility	70
6.1.4. Trees and Landscaping.....	75
6.1.5. Ecologically Sustainable Development	77
6.1.6. Air Quality	79
6.1.7. Noise and Vibration	84
6.1.8. Ground and Water Conditions	88

6.1.9.	Stormwater and Wastewater	91
6.1.10.	Hazards and Risks	94
6.1.11.	Contamination and Remediation	95
6.1.12.	Waste Management	97
6.1.13.	Social Impact	102
6.1.14.	Infrastructure Requirements and Utilities	104
6.1.15.	Construction, Operation and Staging	106
6.2.	Standard Assessment Impacts	106
6.2.1.	Aboriginal Cultural Heritage	106
6.2.2.	Environmental Heritage	107
6.2.3.	Bushfire Risk	107
6.2.4.	Flooding Risk	107
6.2.5.	Biodiversity	108
7.	Justification of the Project	109
7.1.	Project Design	109
7.2.	Strategic Context	109
7.3.	Statutory Context	109
7.4.	Community Views	110
7.5.	Likely Impacts of the Proposal	110
7.6.	Suitability of the Site	111
7.7.	Public Interest	111
	Disclaimer	113

Appendix A	SEARs Reference Table
Appendix B	Statutory Compliance Table
Appendix C	Mitigation Measures
Appendix D	Engagement Summary
Appendix E	QS Cost Estimate report
Appendix F	Survey Plan
Appendix G	Architectural Drawings
Appendix H	Design Report
Appendix I	Design Excellence Strategy
Appendix J	Competition Report
Appendix K	Design Integrity Panel Endorsement
Appendix L	BCA Compliance Report
Appendix M	Fire Safety Strategy
Appendix N	Visual Impact Assessment
Appendix O	Transport, Traffic and Accessibility Assessment
Appendix P	Landscape Plans
Appendix Q	Arboriculture Impact Assessment
Appendix R	ESD Report
Appendix S	BDAR Waiver
Appendix T	Air Quality Impact Assessment
Appendix U	Noise and Vibration Impact Assessment
Appendix V	Geotechnical Investigation
Appendix W	Soil Salinity Investigation & Management Plan
Appendix X	Civil Engineering Report
Appendix Y	Hazard Analysis
Appendix Z	Phase 1 and 2 Environmental Site Investigation
Appendix AA	Remediation Action Plan
Appendix BB	Site Audit Report (Interim Advice)
Appendix CC	Waste Management Plan
Appendix DD	Hazardous Materials Survey
Appendix EE	Aboriginal Cultural Heritage Assessment Report
Appendix FF	Social Impact Assessment
Appendix GG	Utilities and Infrastructure Assessment

FIGURES

Figure 1 Aerial Photograph.....	12
Figure 2 Proposed Site Plan.....	14
Figure 3 Regional Context.....	19
Figure 4 Aerial Image of the site.....	25
Figure 5 Site and Locality Photographs.....	26
Figure 6 Project Area.....	36
Figure 7 Proposed site layout (ground floor)	37
Figure 8 Perspective Views	38
Figure 9 Proposed Elevation Plans	40
Figure 10 Proposed Landscape Plans	42
Figure 11 Concept Programable Art.....	43
Figure 12 Proposed Signage.....	44
Figure 13 Proposed built form context analysis (artist's impressions)	67
Figure 14 Areas of the built form resulting in GFA variation – outlined in yellow	68
Figure 15 VIA viewpoint locations	69
Figure 16 Proposed access / egress arrangement	71
Figure 17 Proposed construction vehicle routes	74
Figure 18 Surrounding Receptors	80
Figure 19 Data Recorded on Days of Exceedances	81
Figure 20 Density of Sensitive Receptors in Vicinity of the Site.....	81
Figure 21 Categorisation of Dust Emission Magnitude	82
Figure 22 Surrounding Sensitive Receivers	84
Figure 23 Surrounding Land Use Context.....	84
Figure 24 Unattended Noise Monitoring Results.....	85
Figure 25 Predicted Construction Noise Exceedances	85
Figure 26 Construction Vibration Impacts	86
Figure 27 Operational Noise Assessment.....	87
Figure 28 Sleep Disturbance Assessment	87
Figure 29 Cut and Fill Plan	90
Figure 30 DG Classes or Materials Stored and Maximum Quantities.....	94
Figure 31 Typical Location of Waste Storage Areas	102

PICTURES

Picture 1 Aerial map of the site.....	19
Picture 2 Location context map of site.....	19
Picture 3 View of site (north-east corner) from Burrows Road	26
Picture 4 View at mid-point of site facing north-west from Burrows Road	26
Picture 5 View of site (south-east corner) from intersection of Burrows and Canal Roads	26
Picture 6 View south-east from Canal Road showing rear of site.	26
Picture 7 View of site (north-west) from the St Peter's WestConnex bridge (during construction)	26
Picture 8 View of Burrows Road frontage looking south	26
Picture 9 Burrows Road / Canal Road.....	38
Picture 10 Burrows Road Office Entry.....	39
Picture 11 Western Facade	39

Picture 12 East Elevation (Burrows Road)	40
Picture 13 West Elevation.....	40
Picture 14 North Elevation	40
Picture 15 South Elevation (Canal Road).....	40
Picture 16 Site Landscaping Plan.....	42
Picture 17 Section.....	42
Picture 18 Sky signs	44
Picture 19 Site ID Sign.....	45
Picture 20 Minor Gate ID Sign	45
Picture 21 View along Burrows Road from the north-eastern corner of the site	67
Picture 22 View towards the corner of Canal Road and Burrows Road from the south-east	67
Picture 23 Undercroft GFA Floor Plan (extract)	68
Picture 24 Warehouse Ground Level GFA Plan (extract)	68

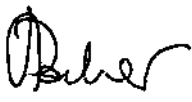
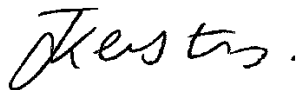
TABLES

Table 1 Applicant Details	17
Table 2 Key Features of Site and Locality.....	27
Table 3 Approved and Likely Future Developments	30
Table 4 Project Alternatives.....	31
Table 5 Project Details.....	34
Table 6 Identification of Statutory Requirements for the Project.....	49
Table 7 Pre-Conditions	52
Table 8 Mandatory Considerations.....	54
Table 9 Key Stakeholder Feedback	59
Table 10 Traffic Generation	73
Table 11 WCM Targets.....	92
Table 12 Contaminants of concern.....	96
Table 13 Estimated types and quantities of construction waste.....	97
Table 14 Estimated Warehouse Operational Waste Quantities	100
Table 15 Estimate Office Operational Waste Quantities	101
Table 16 Assessment of significant social impacts	103

SIGNED DECLARATION

Project details				
Project name	1-3 Burrows Road, St Peters Multi-level Warehouse			
Application number	SSD-35962232			
Address of the land in respect of which the development application is made	1-3 Burrows Road, St Peters Lot 11 DP 606737 Lot 1 DP 1227450 within City of Sydney LGA			
Applicant details				
Applicant name	Goodman Property Services (Australia) Pty Ltd			
Applicant address	1-11 Hayes Road, Roseberry NSW 2018			
Details of people by whom this EIS was prepared				
Names and professional qualifications	Jacqueline Parker Bachelor of Planning (UNSW) Master of Urban Development and Design (UNSW)	Simon Gunasekara Bachelor of Planning (Hons 1) (UNSW)	Jack Kerstens Bachelor of Urban and Regional Town Planning (Hons), University of Queensland	Matthew Holt Bachelor of City Planning (Hons), UNSW
Address	Level 8, Angel Place, 123 Pitt Street, Sydney NSW 2000			
Declaration				
The undersigned declares that this EIS: - has been prepared in accordance with Section 190 and Section 192 of the <i>Environmental Planning and Assessment Regulation 2021</i> as required by the SEARs issued for the project; - 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 <i>State Significant Development Guidelines - Preparing an Environmental Impact Statement</i>; - 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 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	 Jacqueline Parker, Director	 Simon Gunasekara, Associate Director	 Jack Kerstens, Senior Consultant
Date	2 November 2022		

GLOSSARY AND ABBREVIATIONS

Reference	Description
ACHA	Aboriginal Cultural Heritage Assessment
ACHAR	Aboriginal Cultural Heritage Assessment Report
AEP	Annual Exceedance Probability
AHD	Australian Height Datum
AHIMS	Aboriginal Heritage Information Management System
AIA	Arboriculture Impact Assessment
AQIA	Air Quality Impact Assessment
ARI	Average Recurrence Interval
BAM	Biodiversity Assessment Method
BC Act	<i>Biodiversity Conservation Act 2016</i>
BC Reg	<i>Biodiversity Conservation Regulation 2017</i>
BDAR	Biodiversity Development Assessment Report
BEL	Bulk Earthworks Level
CC	Construction Certificate
CDA	Concept Development Application
CEMP	Construction Environmental Management Plan
CIV	Capital Investment Value
CMP	Construction Management Plan
CNVMP	Construction Noise and Vibration Management Plan
CTMP	Construction Traffic Environmental Plan
DCP	Development Control Plan
DIP	Design Integrity Panel
DG	Dangerous Goods
DP	Deposited Plan
DPE	NSW Department of Planning, and Environment
ECA	Electrical and Communications Assessment

Reference	Description
EOTF	End of Trip Facilities
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2021</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EIS	Environmental Impact Statement
EPA	NSW Environment Protection Authority
ESA	Phase 1 and 2 Environmental Site Assessment
ESCP	Erosion and Sediment Control Plan
GANSW	Government Architect for NSW
Goodman / the applicant	Goodman Property Services (Aust) Pty Ltd
GTP	Green Travel Plan
LGA	Local Government Area
LSPS	City of Sydney Local Strategic Planning Statement 2036
NCC	National Construction Code
NHVR	National Heavy Vehicle Regulator
NIA	Noise Impact Assessment
NMLs	Noise Management Levels
OEMP	Operational Environmental Management Plan
PSI	Preliminary Site Investigation
RAP	Remediation Action Plan
Region Plan	Greater Sydney Region Plan
SARs	Commonwealth Supplementary Assessment Requirements
SDCP 2012	Sydney Development Control Plan 2012
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SEPP Planning Systems	<i>State Environmental Planning Policy (Planning Systems) 2021</i>

Reference	Description
SIA	Social Impact Assessment
Site	1-3 Burrows Road, St Peters, Lot 11 in DP606737 & Lot 1 in DP 1227450
SLEP 2012	<i>Sydney</i> Local Environmental Plan 2012
SMP	Salinity Management Plan
SSD	State Significant Development
SSDA	State Significant Development Application
SWMP	Soil and Water Management Plan
TMAP	Transport Management and Accessibility Plan
ULE	Useful Life Expectancy
URU	Utilities Review Update
VIA	Visual Impact Assessment
WCMS	Water Cycle Management Plan
WMP	Waste Management Plan
WSUD	Water Sensitive Urban Design

SUMMARY

This Environmental Impact Statement (**EIS**) has been prepared on behalf of Goodman Property Services (Aust) Pty Ltd (**Goodman**) in support of a State Significant Development Application (**SSDA**) for the site at 1-3 Burrows Road, St Peters.

Goodman have identified an opportunity to demolish the existing underutilised buildings and transform the site into a functional and adaptable modern multi-storey warehouse and distribution centre building, in this highly accessible location and build upon strong ecommerce drivers close to Sydney Airport, Port Botany, Cooks River Intermodal Terminal and the Sydney CBD.

Specifically, the intended outcomes of the project are to:

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

As the proposal is for the purposes of a multi-level warehouse and distribution centre with a capital investment value of \$206,410,000 (excluding GST), it is classified as a State Significant Development (**SSD**) under clause 12, Schedule 1 of the *State Environmental Planning Policy (Planning Systems) 2021*.

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 require the retention of buildings unfit for the modern requirements of warehouse and logistics users within the south Sydney market, with the site unable to realise the potential to deliver a contemporary development which provides employment generating floorspace and contributes to economic development of St Peters and the Southern Employment Lands.

A number of alternative site locations that Goodman own within the South Sydney industrial area were considered. These alternative locations were not preferred as they were not as well located proximate to existing transport networks including Sydney Airport, Port Botany and the surrounding road network. They also did not provide the necessary size and layout requirements to deliver a large-scale warehouse and distribution centre, and were not areas suitably distant from sensitive land uses. The site also benefits from an amended height limit of 30m achieved via a Planning Proposal gazetted in 2021. The purpose of the Planning Proposal was to permit a third level of warehouse, which cannot be achieved on any other site within the south Sydney.

Extensive due diligence, options testing and designed development was undertaken prior to the Proponent's successful Planning Proposal outcome to test necessary functional requirements across the site. Ultimately, a reference scheme was prepared following the culmination of this work. This formed the basis for the Competitive Design Alternatives Process which the applicant undertook in consultation with the NSW Government Architects office and the City of Sydney Council. Three different design schemes were considered throughout the competition process, whereby the winning scheme prepared by Welsh and Major was selected by the competition Jury as the most successful to deliver upon the project objectives and deliver design excellence.

This design scheme has been further progressed throughout an ongoing design development phase and forms part of this SSDA.

The Proposal

The site was identified as being the most suitable location to deliver the project objectives, and ultimately, to deliver a contemporary multi-level industrial warehouse and distribution facility which responds to the site and surrounds.

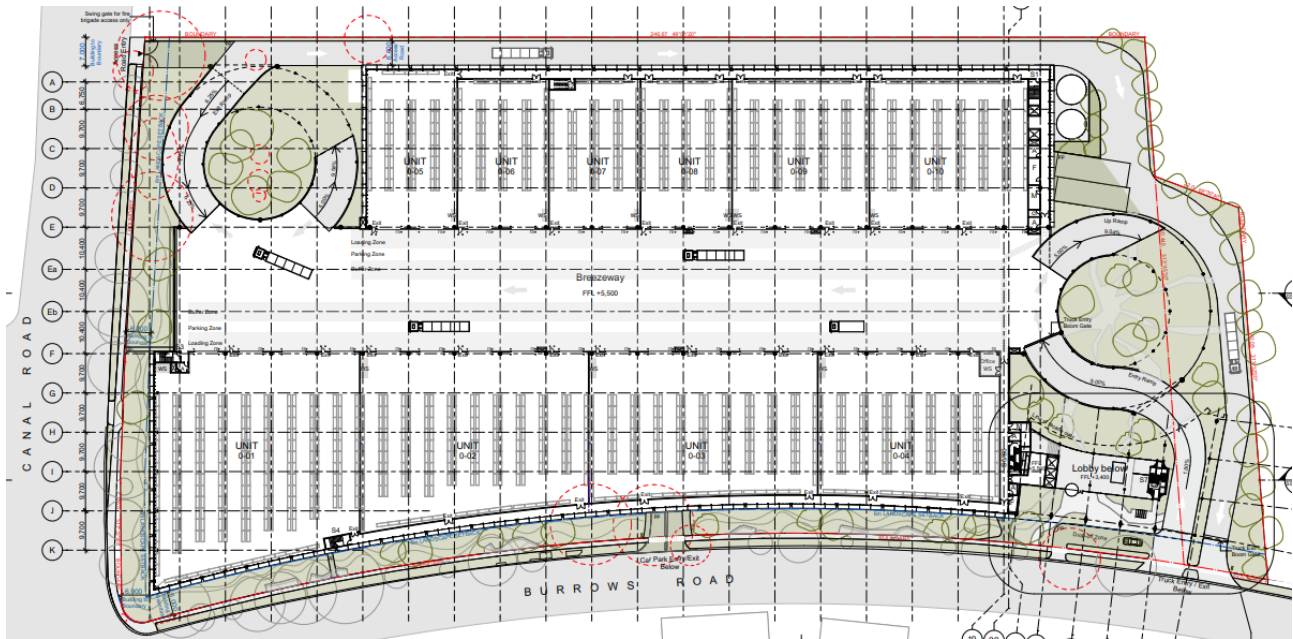
Broadly, the proposed development involves:

- Demolition of all existing structures and buildings on site.
- Tree removal both on site and for a limited number of trees in the public domain and adjoining lot.
- Site remediation, and establishment works, including minor excavation / bulk earthworks.
- Design, construction and operation of a three-storey warehouse and distribution centre building with an ancillary office building, including:
 - Approximately 52,150sqm of total GFA, comprising:
 - 47,076sqm of warehouse and distribution centre GFA; and
 - 5,014sqm of GFA for ancillary office space
 - Café tenancy within the ground floor lobby space of 60sqm GFA.
 - Maximum building height of RL 33.18 (30.14 height in metres).
 - Operation 24 hours per day seven days a week.
- Provision of a single storey undercroft car parking area accessed off Burrows Road which provides 224 car parking spaces (including 12 accessible bays), 17 service vehicle spaces for vans/Utes, 19 motorcycle spaces, and bicycle parking (15 visitor spaces) and end-of-trip facilities (including 58 bicycle parking spaces, showers, lockers and change rooms for occupants).
- New crossings to Burrows Road for truck and car access.
- Single fire and utilities services ingress crossing off Canal Road.

- Site landscaping works totalling approximately 7,464sqm (or 21.6% of the site), including two 6-metre landscaped setback areas to both the Burrows and Canal Roads site frontages and the following provisions:
 - 5,293sqm or 15.3% deep soil landscaping; and
 - 5,074.82sqm or 14.7% tree canopy coverage.
- Provision of building / business identification signage.
- Provision of two chamber substations.

The proposal will be undertaken in accordance with the Architectural Plans prepared by Welsh and Major at **Appendix G**. The proposed site is provided at **Figure 2**.

Figure 2 Proposed Site Plan



Source: Welsh and Major

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 final 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 development as proposed in accordance with the relevant planning instruments and policies, and outlines the mitigation measures to ensure the project does not result in unreasonable or adverse environmental effects. 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.

Overall, it is concluded that 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*
- *City of Sydney Local Strategic Planning Statement*
- *Better Placed*
- *Sustainable Sydney 2030 -2050: Continuing the Vision*

▪ **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 (Planning System) 2021*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021*
- *Sydney Local Environmental Plan 2012 (SLEP 2012)*

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

- The built form responds to both functional and spatial requirements to deliver a contemporary multi-level warehouse and distribution centre which is compatible with the character of the industrial locality.
- The overall singular sweeping built form and façade along the Burrows Road frontage provides a strong conceptual response to the context and scale of the site.
- The proposal seeks to present a built form, façade treatment and materiality that enhances the quality of the site, complemented by new landscaping to deliver an improved streetscape and public domain interface with the built form.
- The proposal provides a strong connection to country outcome which is created through a water narrative and landscape, as well as an integrated public art and lighting strategy.
- The design provides a strong sense of arrival created at the vehicle and office entry by pulling the office building over the access point, integrating the function of the broader development.

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

- The warehouse and distribution centre use is permitted in the IN1 zone and is consistent with the relevant zone objectives, providing a wide range of industrial and warehouse land uses and delivering employment opportunities, while minimising adverse effects on other land uses.
- The development satisfactorily addresses the relevant provisions in SLEP 2012 and SDCP 2012, including acoustic amenity, built form and setbacks, car parking and landscaping. The minor variation to the 1.5:1 FSR control has been justified by way of a Clause 4.6 exception.
- The site is located within an existing industrial area and the character and scale of the development is compatible and consistent with its context, avoiding unacceptable impacts on residential amenity.
- The site is highly accessible to both the transport and regional freight network and the rail network and makes use of a brownfield site to deliver sustainable development.

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

- The proposal is consistent with relevant State and local strategic plans and satisfactorily addresses the relevant State and local planning controls. It assists in replenishing IN1 – General Industrial zoned land in South Sydney, lost in recent years to other uses.
- No adverse environmental, social, or economic impacts will result from the proposal.
- The proposal will provide 670 jobs during the construction phase and 552 jobs once fully operational.
- The proposal will stimulate local investment and contribute significant economic output and value add to the economy each year.
- The project is fully funded and ‘shovel ready’ for commencement of construction as soon as possible next year, subject to obtaining satisfactory Consent.
- 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.

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

1. INTRODUCTION

1.1. PURPOSE OF REPORT

This Environmental Impact Statement (**EIS**) has been prepared on behalf of Goodman Property Services (Australia) Pty Ltd (**Goodman**) (**the applicant**) in support of a State significant development application (**SSDA**) (**SSD-35962232**) for a proposed multi-storey warehouse and distribution centre at 1-3 Burrows Road, St Peters (**the site**).

This EIS has been prepared in response to Secretary's Environmental Assessment Requirements (**SEARs**) issued on 7 February 2022.

The proposed development is classified as a State Significant Development (**SSD**) given the proposed development is for the purposes of a multi-level warehouse and distribution centre and the capital investment value (**CIV**) is greater than \$30 million (approximately \$206 million).

This report includes assessment of compliance with the statutory and strategic planning framework, and all other potential environmental impacts identified through the preparation of this SSDA. Further, this report has been prepared generally in accordance with *State Significant Development Guidelines – Preparing and Environmental Impact Statement* (December 2021). This EIS also provides an assessment of the proposal against the relevant considerations under Section 4.15 of the *Environmental Planning and Assessment Act 1979* (**EP&A Act**).

This EIS should be read in conjunction with all supporting documentation appended to this report at **Appendix A** through to **Appendix HH**.

1.2. APPLICANT DETAILS

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

Table 1 Applicant Details

Descriptor	Proponent Details
Full Name(s)	Goodman Property Services (Aust) Pty Ltd
Postal Address	1-11 Hayes Road, Roseberry NSW 2018
ABN	40 088 981 793
Nominated Contact	Cameron Rubenach – Development Manager (Goodman)

1.3. PROJECT DESCRIPTION

This EIS is submitted to the Department of Planning and Environment (**DPE**) on behalf of the Goodman in support of an application for SSD-35962232 at 1-3 Burrows Road, St Peters. The proposal is for a multi-storey warehouse building which will be used for the purposes of warehousing and a distribution centre.

This detailed SSDA follows on from the Competitive Design Alternatives Process (**competitive design process**) undertaken between January and April 2022, whereby, the winning project architects Welsh and Major (**W&M**) were announced by the Selection Jury (**Jury**).

Specifically, the SSDA seeks consent for:

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

- Approximately 52,150sqm of total GFA, comprising:
 - 47,076sqm of warehouse and distribution centre GFA; and
 - 5,014sqm of GFA for ancillary office space
 - Café tenancy within the ground floor lobby space of 60sqm GFA.
- Maximum building height of RL 33.18 (30.14 height in metres).
- Operation 24 hours per day seven days a week.
- Provision of a single storey undercroft car parking area accessed off Burrows Road which provides 224 car parking spaces (including 12 accessible bays), 17 service vehicle spaces for vans/Utes, 19 motorcycle spaces, and bicycle parking (15 visitor spaces) and end-of-trip facilities (including 58 bicycle parking spaces, showers, lockers and change rooms for occupants).
- New crossings to Burrows Road for truck and car access.
- Single fire and utilities services ingress crossing off Canal Road.
- Site landscaping works totalling approximately 7,464sqm (or 21.6% of the site), including two 6-metre landscaped setback areas to both the Burrows and Canal Roads site frontages and the following provisions:
 - 5,293sqm or 15.3% deep soil landscaping; and
 - 5,074.82sqm or 14.7% tree canopy coverage.
- Provision of building / business identification signage.
- Provision of two chamber substations.

The vision for the project is to transform the site into a functional and adaptable multi-storey warehouse building that will support the provision of warehouse and distribution uses in this highly accessible location and build upon strong ecommerce drivers close to Sydney Airport, Port Botany, Cooks River Intermodal Terminal and the Sydney CBD.

Overall, the project aims to achieve the following objectives:

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

A map of the site in its regional setting is provided in **Figure 3**.

Figure 3 Regional Context



Picture 1 Aerial map of the site



Picture 2 Location context map of site

Source: Urbis

1.4. PROJECT BACKGROUND AND PLANNING HISTORY

1.4.1. Planning Proposal – PP-2020-298

The applicant obtained approval on 16 September 2020 for a Planning Proposal (**PP-2020-298**) at the site.

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

In addition, site-specific provisions for the site were incorporated into the *Sydney Development Control Plan 2012 (SDCP 2012)*.

The new clauses of the SLEP and SDCP are noted as follows:

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

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

An assessment of the proposal against these provisions is provided as part of this EIS.

1.4.2. Competitive Design Process and Design Integrity

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

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

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

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

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

The Jury's recommendation identified several design elements that should be retained to achieve design excellence. The Jury also made recommendations regarding design development matters that were required to be addressed in the future detailed design SSDA phase of the project. These are outlined in the endorsed Design Competition Report and Competition Letter provided at **Appendix J**.

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

The DIP provided endorsement of the design to proceed to lodgement of this SSDA as documented in the DIP Endorsement Letter provided at **Appendix K**. The DIP also outlined additional items that required further

consideration and resolution as part of the SSDA and ongoing design development of the proposal. In summary, these items included:

- *The need to consider and clarify colours and materials across the development.*
- *Cross-sectional details that clarify the proportions of the parapet are required.*
- *Further resolution of the Connecting with Country narrative is needed to achieve a sense of connection between elements.*
- *Greater consideration of indigenous planting / landscaping (socio-ecological planting considerations). Planting to also to respond to a changing micro-climate resulting in not just one rigid outcome.*
- *Consideration of a café or break out spaces for all workers on site.*
- *Additional detail relating to the roof garden is to be provided with the SSDA to provide clarity on set-downs, deep soil provisions and sectional details.*
- *Further resolution of the north-west corner of office building (more refined and, retaining the previous clear and sharp edge rather than flattened with green wall) & also concrete panelling along the western elevation.*
- *Additional detail confirming the material choice of the downpipes given they are now acting as architectural elements.*
- *CGIs are to be more representative of the key elements of the project including colour and materiality.*
- *A whole of building Maintenance Strategy is requested to confirm how the façade and landscape elements will be appropriately maintained to ensure longevity.*
- *At an appropriate time, the Panel request a further presentation post SSDA lodgement to understand the response to matters regarding the façade once costings are known and any changes proposed.*

The proposal's design response to these matters is discussed in **Appendix J** of this EIS. The Applicant and project design team will be presenting the scheme back to the DIP following lodgement of the SSDA as the detailed design continues to be developed and refined.

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

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

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

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

The proposal will deliver 52,150sqm of warehouse and distribution and ancillary office floorspace which will support the retention and management of industrial land within the established Southern Employment Lands area. The proposal will generate 552-687 jobs during operation depending on the automation of the facility, an increase from the existing 20 jobs on site.

2.1.2. Our Greater Sydney 2056: Eastern City District Plan

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

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

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

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

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

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

The proposed development will protect and enhance jobs in the Southern Employment lands, supporting the Green Square-Mascot precinct with 552-687 new jobs and renewal of the existing brownfield site. The proposed will bolster the existing industrial character via the warehouse and distribution uses, facilitating greater opportunities for investment in the area.

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

The proposal will provide 52,150sqm of floorspace associated with a new multi-storey warehouse and distribution building typology which is located within the established Southern Employment Lands industrial area. The building will be utilised for warehouse and distribution purposes and contribute towards local and regional job opportunities, including 241 construction jobs and up to 657 operational jobs.

2.1.3. City of Sydney Local Strategic Planning Statement

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

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

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

The Proposal supports this Key Move and Priority as it proposes to retain and redevelop an existing industrial site for improved warehouse and distribution purposes. The proposal will provide 52,150sqm of high-quality, modern logistics floor space and generate up to 552-657 new direct jobs which will help support the growth of the Southern Enterprise Area and Green Square-Mascot Strategic Centre.

2.1.4. Better Placed

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

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

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

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

The proposed development clearly incorporates the objectives the Better Placed integrated design policy. Refer to the Design Report for further discussion of the “Better Place” design principles (**Appendix H**).

2.1.5. Sustainable Sydney 2030-2050: Continuing the Vision

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

- **1 \ By 2035 we will achieve net zero emissions:** ESD measures integrated into the proposed development, as detailed at **Section 6.1.5**.
- **5 \ By 2036 there will be approximately 700,000 jobs:** The proposed development will produce 552-657 jobs, well in excess of the existing development and working towards providing secure job opportunities to the City of Sydney LGA.
- **8 \ By 2050 people will use public transport, walk or cycle to travel to and from work:** Use of sustainable transport options such as public transport, bicycling and walking are encouraged and promoted as part of the proposed development. End of Trip Facilities (**EOTF**) are all accommodated onsite with a Green Travel Plan provided as part of this application to work towards the 2 out of 3 people use goal.

The strategic directions relevant to the proposed development are:

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

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

2.1.6. City of Sydney Employment Lands Strategy 2014-2019

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

- **Implement planning solutions that work towards the objectives and targets provided by Sustainable Sydney 2030** – the proposed development, in the context of the now gazetted planning proposal for the southern employment lands, work within the applicable planning controls and reflects the values and vision of *Sustainable Sydney 2030* as seen in **Section 2.1.5**.
- **Encourage a sustainable, high quality and functional built form that respects the history of the southern employment lands** – the proposed development, being a greater utilisation of the existing warehouse and distribution centre with a design that meets ESD targets, reinforces the sustainability

outcomes for the southern employment lands. The sustainability outcomes of the proposed development are discussed further in **Section 6.1.5**.

2.2. KEY FEATURES OF SITE AND SURROUNDS

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

The site is an irregular shaped allotment with a total area of approximately 34,614sqm. The site adjoins Burrows Road to the east with a primary curved frontage of approximately 280 metres and adjoins Canal Road to the west with a secondary frontage of approximately 146 metres.

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

An aerial image of the site is illustrated in **Figure 4**. Photographs of the site and the locality in its current condition are provided in **Figure 5**.

Figure 4 Aerial Image of the site



Source: Urbis / NearMap

Figure 5 Site and Locality Photographs



Picture 3 View of site (north-east corner) from Burrows Road



Picture 4 View at mid-point of site facing north-west from Burrows Road



Picture 5 View of site (south-east corner) from intersection of Burrows and Canal Roads



Picture 6 View south-east from Canal Road showing rear of site.



Picture 7 View of site (north-west) from the St Peter's WestConnex bridge (during construction)



Picture 8 View of Burrows Road frontage looking south

Source: Goodman

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

Table 2 Key Features of Site and Locality

Descriptor	Site Details
Land Configuration	<u>Site area:</u> 34,614sqm (approx.) <u>Site boundaries (length and depth):</u> – Burrows Road (south) (primary frontage) – 280m (approx.) – Canal Road (west) (secondary frontage) – 146m (approx.) <u>Topography:</u> The site topography is relatively flat with a slight fall of approximately 2-2.7m from north-west to south-east. A Site Survey Plan is provided at Appendix F.
Land Ownership	The site is owned by Tallina Pty Ltd as custodian for BDE Unit Trust.
Existing Development	The site is currently occupied by older low-rise industrial units that are largely consistent with development in the surrounding area which is predominantly of an industrial nature. The industrial units comprise four large format steel framed warehouse / distribution facilities. These buildings no longer meet the requirements of contemporary industrial users in this market. The largest existing warehouse building is situated in the south-west corner of the site at the corner of Burrows Road and Canal Road.
Local and Regional Context	The site is situated within an established largely industrial area. The site is surrounded by existing industrial and commercial developments to the north-east, south-east and south-west. The Alexandra Canal is located approximately 100 metres to the south-east and east. The site is strategically located within proximity to Sydney Airport (situated approximately 700 metres to the south) and Port Botany (situated approximately 6km to the south-east). The Cooks River Intermodal Terminal, a container storage yard, is located about 100 metres northwest of the site. To the west and north, the site borders the newly completed St Peters WestConnex Interchange, providing links to the new M8 tunnel, and future links to M4 / M5 Tunnels and Sydney Gateway. A large “viewing mound” area is located to the west of the site within the St Peters WestConnex Interchange site. The site is proximate to several open space areas, most notably, the significant open space area of Sydney Park is located approximately 400 metres to the north-east. Photographs of the surrounding land uses are provided as Figure 5.
Infrastructure	The site is currently bounded by Canal Road to the south, a classified road under the <i>Roads Act 1993</i> , and Burrows Road to the east. The site is also connected to the Princes Highway via Canal Road, Gardeners Road and the WestConnex. The M4-M5 Link Tunnels (currently under construction) will link the St Peters Interchange to the new M4 Tunnels in

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

Descriptor	Site Details
Services	The site is within an established industrial area with availability to existing services for power, gas, water and sewer mains, stormwater and telecommunications networks.
Acid Sulfate Soils (ASS)	Mapped as Class 3 ASS under the Sydney LEP 2012. The Soil Salinity Investigation prepared by PSM (Refer to Appendix W) concluded that ASS do not impact the site or any proposed works.
Contamination	A Phase 1 and 2 Environmental Site Assessment (ESA) was undertaken by AECOM as part of the Planning Proposal (PP-2020-298) (refer Appendix Z). The boreholes identified the presence of contaminated fill material to an average depth of 3.5m across the site. In addition, groundwater contains concentrations of metal. The contamination identified in the fill material will require implementation of management controls during site redevelopment as outlined within a Remedial Action Plan (RAP) (Refer to Appendix AA).
Stormwater and Flooding	Ponding water is shown to be present adjacent the site in Burrows Road centred around the low point in the road. This would occur during the 1% Annual Exceedance Probability (AEP) (1 in 100-year ARI storm). The ponding water within Burrows Road can be seen to be up to 0.5m. The 1% AEP flood level is estimated to be RL 2.3m AHD. The 1% AEP level of RL 2.3m AHD is based on the noted modelled flood depths applied to the respective detail surveyed levels in Burrows Road of RL 1.8m AHD. The PMF flood model shows the flood level around this site to be approximately RL 4.5m AHD.
Bushfire Prone Land	The site is not bushfire prone land.
Flora and Fauna	Some mature tree vegetation exists along the Burrows Road and Canal Road frontages, predominantly outside the property boundary. Specifically, the site has a total of 59 trees which comprise 17 species, including 15 native and 2 exotic species, located within or adjacent to the site.
Aboriginal Heritage	The Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared by Artefact (Appendix DD) determined that the site has nil-low archaeological potential to retain intact archaeological deposits that may contain Aboriginal objects. Therefore, no further archaeological investigation is recommended.
European Heritage	No heritage items on the site or immediately adjacent land and the site is not within or near a heritage conservation area. The State heritage listed Alexandra Canal is located substantially away from the site approximately 100 metres to the south-east / east.

2.3. FUTURE PROJECTS PROXIMATE TO THE SITE

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

Table 3 Approved and Likely Future Developments

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

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

2.4. FEASIBLE ALTERNATIVES

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

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

Table 4 Project Alternatives

Option	Assessment
Option 1 – Do Nothing	The “do nothing” option was dismissed as it would compromise the objectives of the proposal. No development would result in the existing industrial buildings on-site becoming increasingly underutilised and eventually they would deteriorate, given they do not meet the requirements of the contemporary industrial users in this market. Effectively, the site would not realise its employment generating potential and would not leverage off the site’s access to nearby freight transport nodes, thus, not contribute to economic development of St Peters and the Southern Employment Lands. In addition, the proposed landscape and public domain improvements and public art offering would not be delivered to the detriment of the surrounding area and the construction and operational jobs provided by the proposal would not be available to the community.
Option 2 – Alternative Location	Consideration was given to other sites Goodman owned within the South Sydney industrial area. However, these sites were not determined as being preferable given they were not as well located proximate to existing transport networks including Sydney Airport, Port Botany and the surrounding road network (including the adjacent St Peters West Connex site). This limits the access opportunities to support the functional purpose of the use and would fail to leverage off existing transport infrastructure opportunities. The Planning Proposal PP-2020-298 clearly established the strategic merit for the site to deliver a substantial warehouse and distribution centre including allowance for additional building height. In addition, the alternative sites / locations considered did not provide the necessary size and layout requirements to deliver a large scale warehouse and distribution centre. Given the limited size afforded by other sites, there were limited opportunities to deliver a sufficient amount of warehouse and distribution centre floorspace whilst accommodating the functional and operational requirements for this building typology, such as the large one-way vehicle circulation ramps which provide heavy vehicle access throughout the site. Being able to support these necessary functionality requirements is crucial to the successful operation of the proposal. The site is also well situated on the corner of two roads and immediately adjacent to the St Peters WestConnex Interchange. These developments and other surrounding industrial sites do not represent sensitive land uses that will be significantly impacted by the proposal. The proposal is compatible with the surrounding locality and emerging built form character. The assessment provided as part of this EIS confirms that the proposal will not result in any adverse economic, environmental or social impact.
Option 3 – Alternative Design	Prior to the Proponent’s successful Planning Proposal outcome, extensive due diligence, options testing and design development was progressed to test necessary functional requirements of multi-level design that could be

Option	Assessment
	achieved on the site, whilst accommodating required access and circulation needs to service a third level. Subsequently, a reference scheme was prepared as part of the Planning Proposal which was the culmination of this work. The reference scheme was included as part of Competition Design Brief as a guide to articulate the functional requirements and spatial relationships of the various components of multi-level warehousing. As documented in the Design Competition Report provided at Appendix J, three different design schemes were considered by the Jury as part of the design alternatives process. The two unsuccessful competition schemes explored alternative design and layout options such as locating the ancillary office building on the south-east corner of the site. This was considered an inferior outcome due to the harshness of the Canal Road environment for pedestrians and was less cognisant of occupant amenity. The other scheme options also considered differing architectural designs with regards to massing / modulation, articulation and materiality. Ultimately, the Jury determined that the winning scheme provided the most convincing response to the design, planning and commercial objectives of the project, noting it was considered the most capable of achieving design excellence. The Project is justified on the basis that it is compatible with the locality in which it is proposed, resulting in economic benefits and can achieve the overall Project's objectives, whilst managing and mitigating any potentially adverse environmental impacts.
Option 4 – The proposed development (preferred option)	Different locations were investigated, and two other designs were considered. The site was identified as being the most suitable location for the proposed warehouse and distribution centre and the final design was considered to deliver design excellence for the following reasons: ▪ It is consistent with the design and commercial objectives for the project as established under the competitive design process; ▪ As discussed in Section 6.1.1, the proposal achieves design excellence and was selected by the competition Jury as the competition winner and endorsed by the DIP to proceed to lodgement; ▪ The proposal facilitates the orderly and efficient use of a brownfield site and delivers sustainable development; ▪ The proposal is consistent with zone objectives and permitted with consent within the IN1 General Industrial zone; ▪ The design delivers employment generating floorspace and job opportunities within the Eastern Economic Corridor; ▪ The proposal leverages off proximity to key transport nodes including Sydney Airport and Port Botany, and benefits from access to the

Option	Assessment
	surrounding regional road network including the new St Peters West Connex site situated immediately to the north of the site; ▪ The proposal is compatible with surrounding development and will result in minimal impact on the environment, subject to implementation of suitable mitigation measures; and ▪ The proposal will not result in unacceptable environmental impacts including in relation to ecology, biodiversity, heritage, noise and views.

3. 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 proposal is for a multi-storey warehouse building with ancillary office space which will be used for the purposes of warehousing and a distribution centre.

The key components of the proposed development are summarised in **Table 5**. A copy of the architectural concept drawings is attached as **Appendix G**.

Table 5 Project Details

Descriptor	Project Details
Project Area	The site has a total area of 34,614sqm. The total site is expected to be physically disturbed by the project.
Site Description	The site comprises two parcels of land (allotments) and is legally described as Lot 1 DP 1227450 and Lot 11 DP 606737.
Project Description	The project comprises the demolition of existing buildings, removal of trees, remediation of the site, and construction and operation of a three-level warehouse and distribution centre development, with an ancillary office building, amenities, parking, and associated works, including site preparation, earthworks, and landscaping.
Land Uses and GFA	Total GFA of 52,150m², broken down as follows: ▪ Warehouse and distribution centre: 47,076m² – Ground level: 15,647m² – Level 1: 15,617m² – Level 2: 15,614m² ▪ Ancillary Office: 5,014m² including: – Ancillary gym/EOTF: 198sqm ▪ Food and Drink Premises (café): 60sqm
Access	Existing site access points from Burrows Road will be replaced with four (4) ingress and egress points along Burrows Road and one (1) fire brigade only ingress point from Canal Road. The specific access arrangement is outlined below. ▪ Burrows Road: – Primary truck entry / exit accommodating up to heavy rigid vehicles. The entry and exit are separate, the entry being left-in and the exit being left-out. – Undercroft car park entry and exit access point partway along the eastern frontage for light vehicles. Left-in entry and left-out exit.

Descriptor	Project Details
	– A separate vehicle crossover for the drop-off zone for light vehicles connected to the lobby is also provided. Ingress is combined with the aforementioned truck entry, and egress is left-out. ▪ Canal Road: – An ingress only access driveway for fire brigade use.
Maximum Height	RL 33.18 metres (30.14m) (or 6 storeys) (utilising design excellence bonus)
Parking Spaces	Total of 241 spaces within the undercroft, comprising: ▪ 224 Car parking spaces allocated accordingly: – Warehouse: 156 – Office & cafe: 68 – Including 12 accessible ▪ 17 vehicle service spaces for vans/Utes ▪ 19 Motorcycle parking spaces
Bicycle Parking	73 spaces for warehouse and office (including café) staff and visitors
Loading	Heavy vehicle loading and unloading is provided directly to each tenancy via the breezeway hardstand areas across the three levels of the warehouse.
Landscaped Area	7,464m² (21.6%) of total landscaping area, including: ▪ 5,293m² deep soil (15.3%). ▪ 5,075sqm (14.7%). ▪ 1,423sqm roof garden.
End of Trip Facilities & Amenities	EOTF have been provided within the undercroft adjacent to the bicycle parking store and in proximity to the office entrance / link. Provisions include lockers, showers and change facilities for both males and females, as well as accessible provisions. Further onsite amenities include the gymnasium located within the undercroft, café at ground floor of the office component and rooftop terrace / garden on the office building.
Construction Hours	Standard hours of construction in the City of Sydney LGA are: ▪ 7.30am to 5.30pm Mondays to Friday ▪ 7.30am to 3.30pm on Saturday ▪ No work on Sundays or Public Holidays (unless otherwise permitted)
Hours of Operation	24 hours per day, 7 days per week.

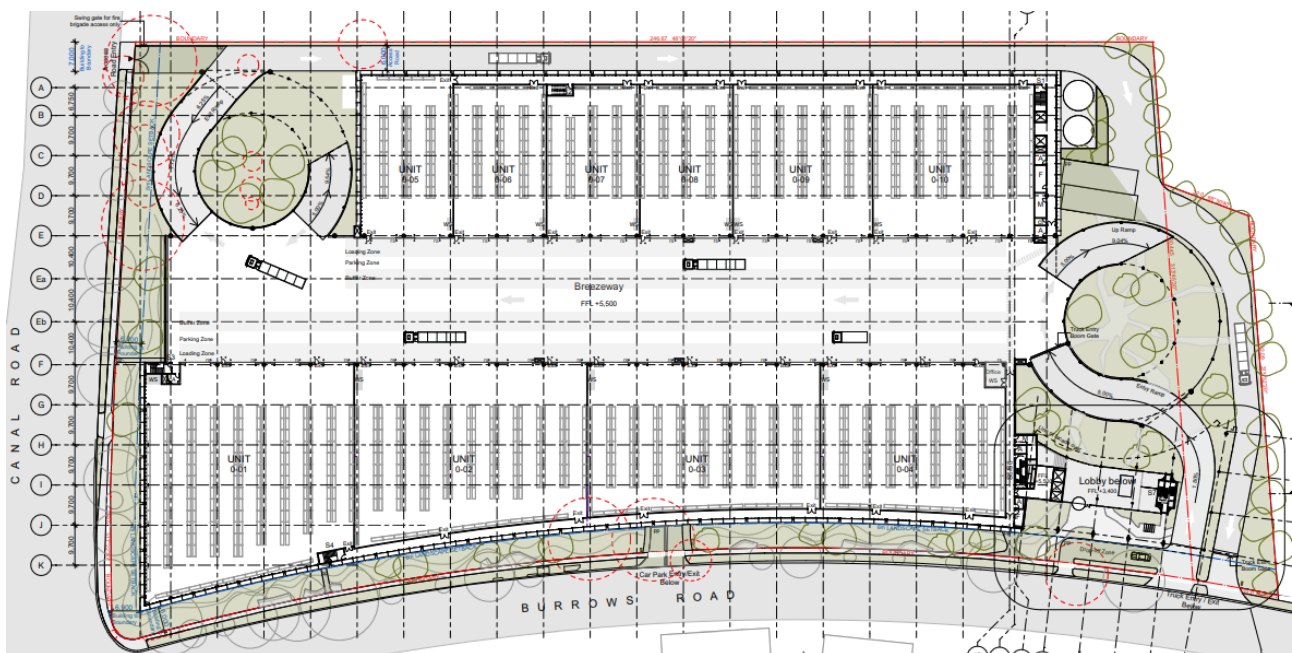
3.2.2. Physical Layout and Design

3.2.2.1. Site Layout

The site layout has considered the existing site conditions and the functional requirements of the warehouse and distribution use. As shown in **Figure 7**, the proposed development will involve:

- Construction of a warehouse and distribution centre (47,076m²) sited centrally but covering the majority of the site consisting of three levels of warehouse space (to support future tenancies) and six levels of ancillary office space (5,074m²) situated in the north-eastern corner of the site, including a café at ground level. Each tenancy will be directly accessible via the central enclosed breezeway on each level of the warehouse. Car parking is provided off Burrows Road to an undercroft car park area.
- Heavy rigid vehicle access to and from the warehouse tenancies is provided via two large spiral ramp structures at the northern and southern ends of the site. The existing ingress and egress points will be removed and replaced with four new accessways off Burrows Road and a single ingress point off Canal Road (for fire truck access only), concentrating truck movements away from the classified Canal Road.
- Landscaping has been located around the Canal Road / Burrows Road 6m setback with additional planting proposed within and on top of the spiral ramps, around the lobby area and as part of the rooftop terrace.
- On-site amenities designed to meet the needs of employees include a café at the ground level of the office building, communal rooftop garden on top of the office, as well as gym and EOTF facilities along the eastern edge of the undercroft car park area.

Figure 7 Proposed site layout (ground floor)



Source: Welsh + Major

3.2.2.2. Design and Built Form

The proposal represents best-practise design, pioneering the future of warehouse and logistics centres in Australia. The built form, subject of a design excellence competition process, has been designed to respond to the relevant planning controls, site characteristics and enhances the surrounding development in St Peters (Refer to **Figure 8**).

The northern portion of the site including the ancillary office space and rooftop garden area has a maximum height of RL 33.18 (30.14m). The majority of the site has a maximum height at roof ridgeline of 26.42m at RL 29.35. This accommodates rooftop plant areas, lift overruns, and PV Cells.

The proposed development is setback a minimum of 6m from Canal Road and Burrows Road with the interface on the corner of Canal and Burrows Road having a 6.9m setback. These setback areas will be

landscaped to soften the built form and improve pedestrian amenity at ground level. A minimum 7m setback is provided to both the western and northern boundaries.

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

Engaging Yerrabingin as part of the design team guided the Designing with Country response. This allowed for incorporation of design concepts including water, movement, scale, seasonality, and Care of Country all into the design. This is most emphasised in the landscaping and public art outcomes. Refer to **Section 3.2.2.3 & 3.2.2.4**.

The location and design of the vehicle ramps have been carefully considered to minimise traffic impacts along Canal Road, integrating them into the built form celebrating this best-in-class warehouse design, drawing parallels to the WestConnex hilltop park adjacent the site. These 50m diameter spirals also create a sculptural counterpoint to the long massing of the site. Landscaping and green roofing forms a major component of the ramps, softening their visual impact.

The ancillary office has been intentionally located at the north-east corner of the site as a space less hostile to pedestrians and in close proximity to the Alexandra Canal pedestrian link. The 6 levels of office space, including lobby, meeting rooms, café spaces and a rooftop garden, optimise the space for flexibility and enhance user wellbeing. Curtain wall glazing with external sunscreens maximises controlled natural light. Further, the concentration of landscaping and public domains makes an attractive entry to the office component. Refer to **Section 3.2.2.3** for more detail.

Solar panels are proposed to be distributed across the unutilised parts of the roof. All panels will be slightly angled to capture sunlight, with a 3 degree fall from 3 distinct ridge lines along the roof. The height of these ridge lines does not exceed 26.42m (RL29.35) which is below the 30m height limit.

Figure 8 Perspective Views



Picture 9 Burrows Road / Canal Road



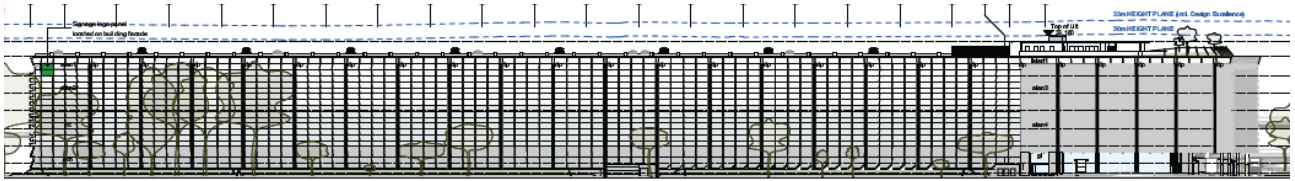
Picture 10 Burrows Road Office Entry



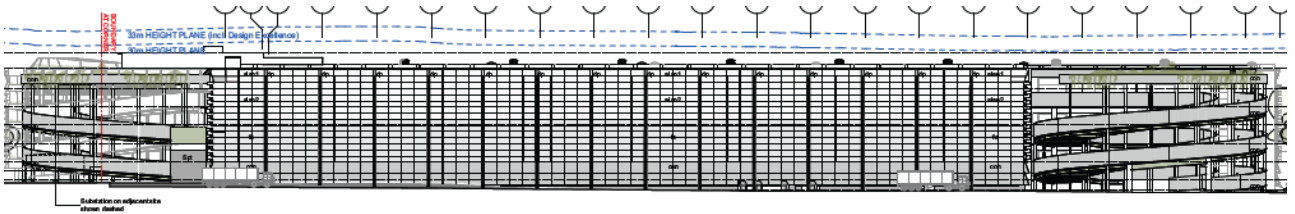
Picture 11 Western Facade

Source: Welsh + Major

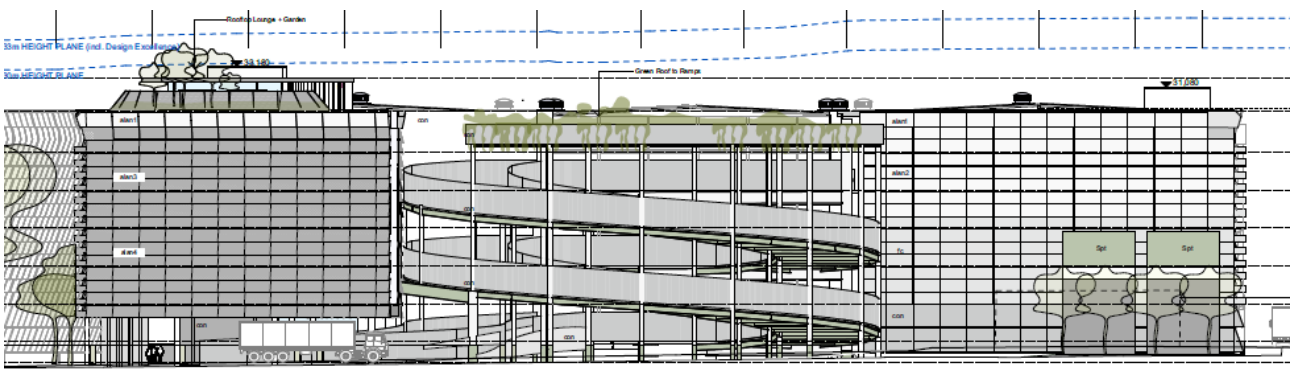
Figure 9 Proposed Elevation Plans



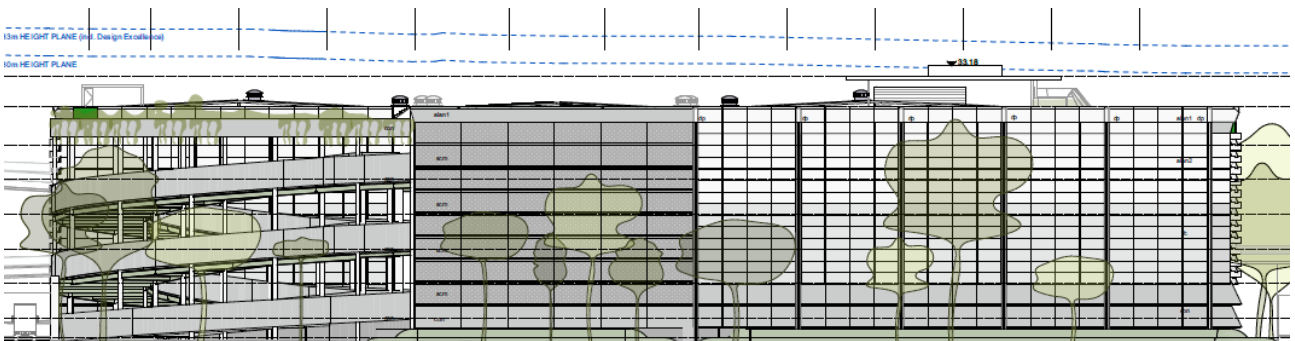
Picture 12 East Elevation (Burrows Road)



Picture 13 West Elevation



Picture 14 North Elevation



Picture 15 South Elevation (Canal Road)

Source: Welsh + Major

3.2.2.3. Landscaping & Connecting with Country

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

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

In pursuit of achieving these principles, the entire landscape design integrates the history, evolution, and characteristics of the site area, specifically the Alexandra Canal, in consultation with Yerrabingin to better integrate elements of Country, all with a narrative to Gadigal placemaking through regenerative practises of native ecologies of the place. This is realised in extensive tree, shrub and group cover plantings to the site, and incorporation of sitting and gathering places to appreciate the outcomes of this design approach (Refer to **Figure 10**).

The proposal includes a total landscape area of 7,464qm or 21.6% of the site area. This comprises 5,293sqm of deep soil compliant area (15.3%), permeable paving and other landscaped areas that are not strictly “deep soil”. In addition, the proposal provides 1,423sqm of green roof area at the office roof terrace and on top of the ramp roofs.

The boundary treatment provides for extensive tree and shrub plantings located in the 6-metre setback to Burrows and Canal Roads. With the provision of large street trees, including *Angophora Floribunda* (Rough Barked Apple), *Eucalyptus Botryoides* (Bangalay), *Angophora Costata* (Sydney Red Gum), and *Syncarpia Glomulifera* (Turpentine), the tree canopy for the site provides an opportunity to supplement and regenerate the native canopy plantings and achieves a 14.7% site coverage (5,075sqm). Seating and breakout spaces along Burrows Road provide opportunities to enjoy these landscaped frontages, offering the employees onsite and general community a chance to experience native ecologies. The sweeping form of the Burrows Road façade imitates that of the Alexandra Canal with the ground being modulated to capture and reintegrate rainwater to the natural systems leading to the Alexandra Canal, reinforcing the regenerative and integrated design principles.

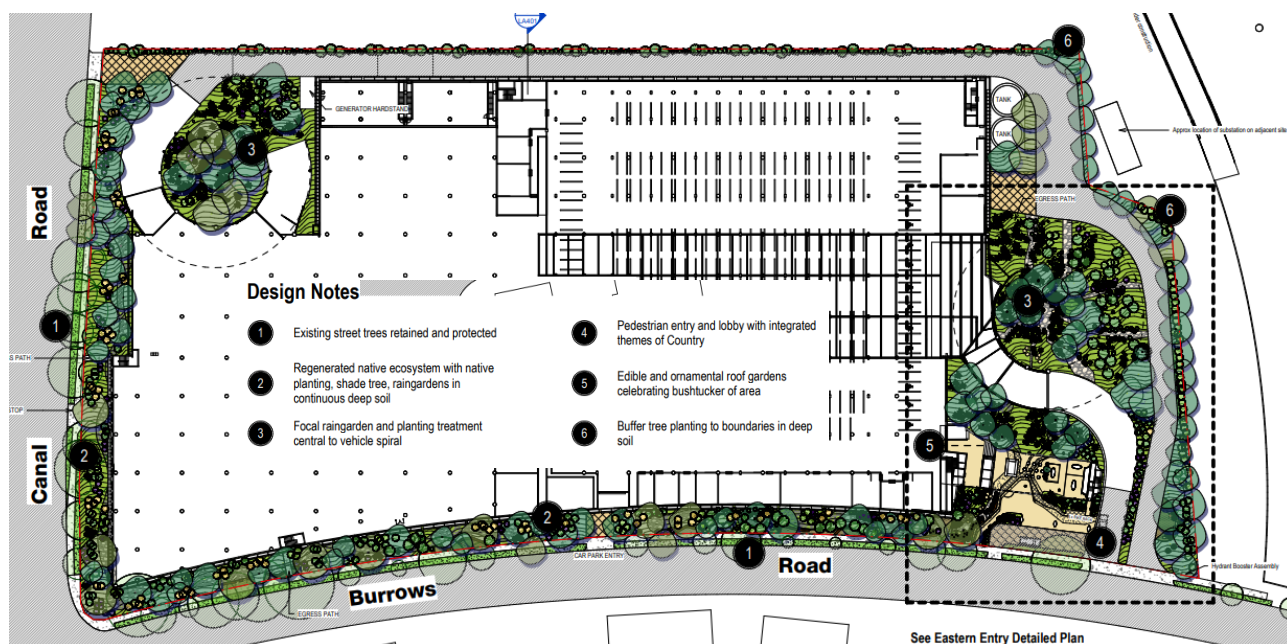
The landscape design principles continue into the lobby, with graded path networks providing opportunities to sit and enjoy native vegetation and shade from the *Backhousia Myrtifolia* (Lemon Scented Myrtle) trees. The weaving pedestrian pathways form a component of the interwoven Designing with Country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

Punctuating the vehicular ramp spines are feature *Melaleuca Quinquernervia* (Paperbark Tree) with shade tolerant native ground covers emulating natural ecologies while maintaining clear sightlines through the spirals. An extensive Water Sensitive Urban Design (**WSUD**) raingarden is proposed for the centres of these spirals to support plant growth whilst collecting, storing, and returning rainwater to the surrounding water systems.

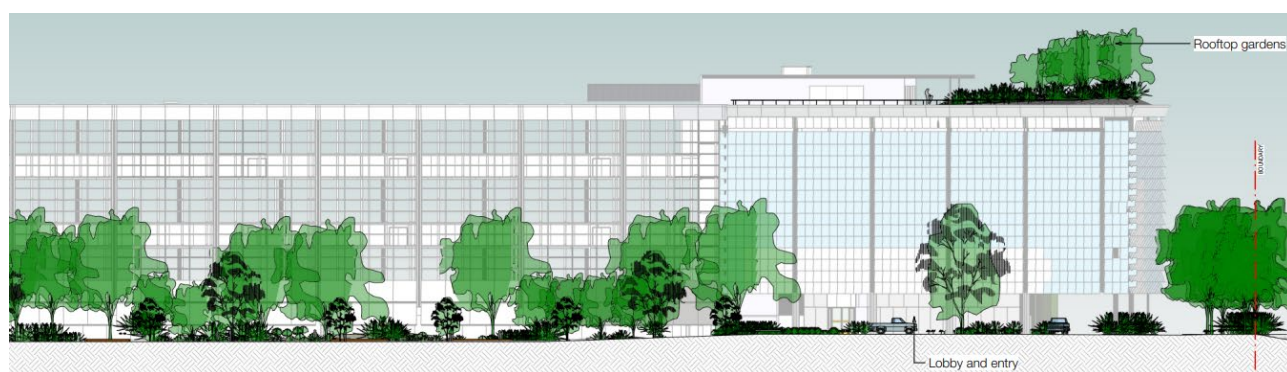
Softening the roof elements of the proposed development, the proposed rooftop garden and green roof over the two spiral ramps provide visual and ecological amenity. The green roofs will include a diverse mix of low water use native shrubs to spill over the sides of the ramps to reflect the natural environment of the area. The rooftop garden is designed to engage with the natural environment too, with mounded growing medium creating consolidated soil volumes to enable additional native planting. Moreover, a bee-highway is incorporated to the side of the rooftop garden to further enhance the ecological value of this important space.

Refer to the Landscape Plans provided at **Appendix P**, and the Designing with Country Visual Design Report prepared by Yerrabingin, provided at **Appendix H**, for further details.

Figure 10 Proposed Landscape Plans



Picture 16 Site Landscaping Plan



Picture 17 Section

Source: Taylor Brammer

3.2.2.4. Public Art & Lighting Strategy

The site and proposed development sit in a highly trafficked area, adjacent to the major freeway that will see thousands of commuters pass by daily. As such, the proposal has a unique opportunity provided by the scale of the development acting as a canvas on which to paint a memorable landmark. The proposed public art will utilise lighting along the Canal and Burrows Road frontages to portray the concept of constant change, reflecting the First Nation's experience of seasonality and natural rhythms, as well as the sites role as the nexus of urban activity (Refer to **Figure 11**).

6,000 LEDs will be implanted in the frontage façades creating a 700m long canvas. The lighting infrastructure will be provided and tested by Light Moves. An artist will be selected through a competitive commissioning process.

Nominating and commissioning the artist for this public art will follow a 6 stage process:

- Stage 1 – Artist brief and contract: Curator prepares brief, contract, and project plan.
- Stage 2 – Artist selection and engagement: Curator manages procurement process and negotiates signing of artist contract.
- Stage 3 – Concept development: Selected artists develop concepts, which may be revised up to 3 times. The artist and curator develop a stakeholder engagement plan for consultation.
- Stage 4 – Design development: Concept is developed to make it ready for fabrication.

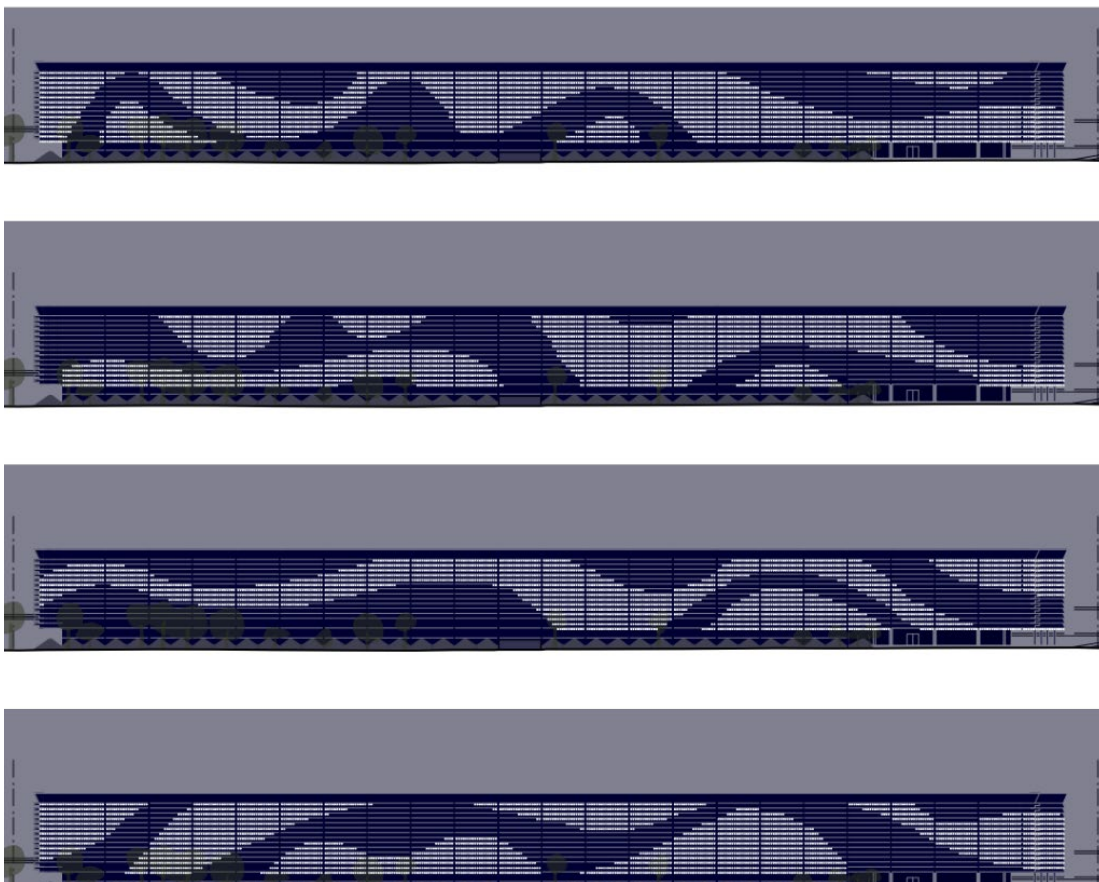
Consideration has been given to the following matters regarding the public art and façade lighting:

- Materials:
 - The materials will be non-corrosive and long lasting, suitable for long term outdoor exposure.
 - Suitable material certification of the quality will be part of the artist brief and artists are encouraged to source sustainable and Green Star certified materials.
- Cleaning:
 - Goodman will use reasonable endeavours to ensure that the maintenance program is in accordance with the fabricator's specification.
- Maintenance:
 - Maintenance will be at the cost of the owners/operators of the building.
 - A maintenance manual will be prepared specifying any cleaning or upkeep requirements.

A Public Art Strategy is attached with the Design Report at **Appendix H** with an additional Appendix detailing potential lighting concepts and physical implementations to be explored throughout the ongoing detailed design phase.

Further detail on the design intent of the façade lighting / public art strategy was presented to the DIP during the meeting held on 18 August 2022. The DIP noted that both the lighting and public art outcome are well progressed. Further information has been provided as part of the SSDA and the strategy will be presented to the DIP post lodgement, including how Connecting with Country considerations have been embedded into the design.

Figure 11 Concept Programable Art



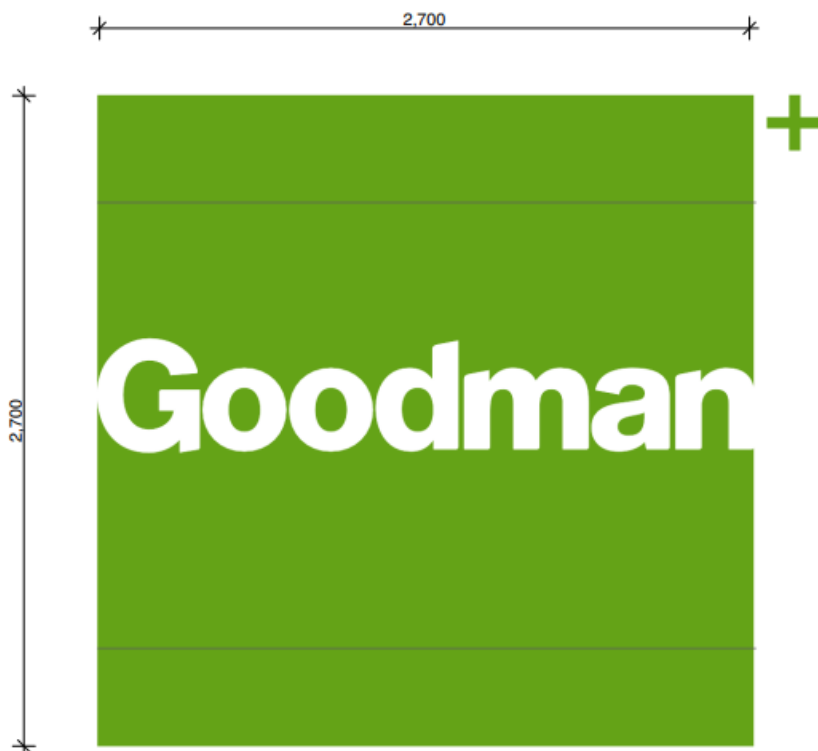
Source: Welsh + Major

3.2.2.5. Signage

Business and building identification signage is proposed in the form of pylon wayfinding signage and integrated façade signage. The proposed signage has been designed to integrate with the building design, the integrated façade sign being illuminated.

- 2 x business identification skysigns (illuminated) (refer to **Figure 12**)
 - Dimensions: 2700mm by 2700mm
 - Materiality: Fabricated aluminium sign case with backlit PVC 'Flexface' cantilevered 'bracket' behind and fabricated backlit logo with acrylic front faced with coloured film.
 - Location: Eastern façade (south-east corner) and southern façade (adjacent ramp)
- Site building ID plinth sign (illuminated) (refer to **Figure 12**)
 - Dimensions: 5600mm by 800mm
 - Materiality: Concrete plinth with aluminium fascia and text from opal acrylic.
 - Location: North-east corner of site adjacent heavy vehicle crossover
- Minor gate building ID sign (illuminated) (refer to **Figure 12**)
 - Dimensions: 3200mm by 800mm
 - Materiality: Concrete plinth with aluminium fascia and text from opal acrylic.
 - Location: Eastern boundary at entrance / crossover to undercroft car park

Figure 12 Proposed Signage



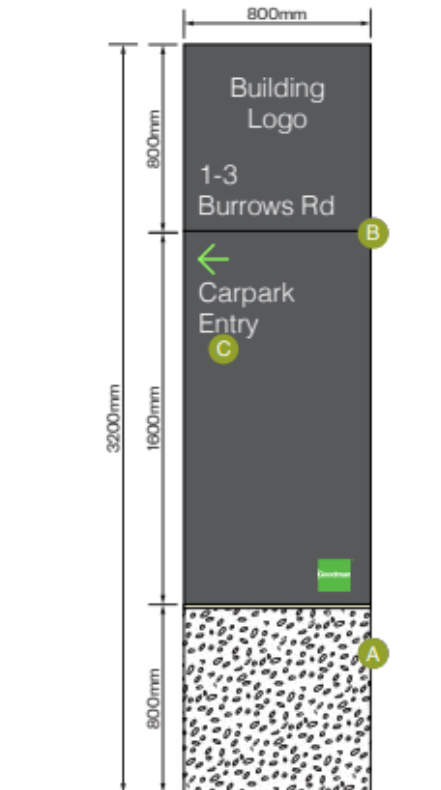
Picture 18 Sky signs

Source: Welsh + Major



Picture 19 Site ID Sign

Source: Welsh + Major



Picture 20 Minor Gate ID Sign

Source: Welsh + Major

3.2.3. Uses and Activities

3.2.3.1. Site Preparation and Earthworks

All existing buildings and most hardstand areas onsite will be demolished as part of the proposed development as outlined on the Demolition Plan ('SSDA-101') provided in the attached architectural drawing (**Appendix G**).

In addition, tree removal on site and on surrounding land is also proposed as follows:

- Removal of 18 trees on site,
- Removal of 2 trees partly on the adjoining WestConnex lot (Lot 14 in DP 606737), and
- Removal of 3 trees within the public road reserve along Burrows Road (permission from Council required).

The project Arborist and Proponent have also identified two (2) trees located within the Canal Road nature strip which are Category U trees and should be removed due to advanced decay and poor structure.

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

- Bulk Earthworks – bulk earthworks will be undertaken to conform the site down to the appropriate pad levels to enable the proposed warehouse, office and undercroft carparking. The undercroft parking area is proposed at RL 2.3m (cut) and the warehouse level at RL 5.5 (fill). The earthworks are estimated to involve 18,600m³ of cut, 41,600m³ of fill and removal of 6,000m³ of building soil. Approximately 17,000m³ of residual fill will be required on site following cut earthworks.
- Retaining Walls – Retaining wall infrastructure will be required around the undercroft car parking area as well as along the site boundary. Retaining wall heights vary from 0.6m to 3m.

- Embankment Stability – Permanent batters will be required in clay areas and will be no steeper than 3 horizontal to 1 vertical. Temporary batters for the construction phase will be no steeper than 2 horizontal to 1 vertical.
- Groundwater – Surface water management, including runoff management, and water quality and quantity management systems are proposed to mitigate any impact to ground water (between 1.6m and 4.0m below ground level).
- Acid Sulphate Soils & Salinity – The soils onsite have been identified as slightly to moderate saline sands. A Salinity Management Plan and a Soil Management Plan have been prepared by PSM Consult and are provided at **Appendix W**.

3.2.3.2. Remediation

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

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

3.2.3.3. Operations

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

- Handling of goods and materials for storage and distribution, including loading and unloading.
- Heavy rigid vehicle movements and car parking, including arrival and departure of employees.
- Office operations to support the warehouse and distribution centre, including gym amenities and EOTF provisions.
- Food and drink premises (café) which will be available for on site staff and the public.

Warehouse

Trucks will enter the site from the northern truck entrance along Burrows Road. One-way clockwise truck circulation spines at the northern and southern ends of the site will allow direct access to each warehouse tenancy. The proposed warehouse tenancies are set across three levels of between 15,614m² and 15,647m² of warehouse GFA on each level, connected to the spines by a central covered hardstand area which accommodates the set down, unloading, and safe entry / exit of delivery vehicles.

Pedestrian safety is guaranteed via access corridors along the east and west facades then across to the northern edge of the warehouse blocks. A safe pedestrian crossing point is provided across the northern end of the breezeway.

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

Office / Amenities

Servicing these warehouse facilities is an ancillary office building. These spaces are not physically connected with specific warehouse tenancies, rather they will be allocated to tenants on a need-by-need basis. This design will optimise workplace flexibility and enhance user wellbeing.

Each office floor is serviced by central shared meeting rooms, breakout spaces, and kitchen facilities. 30 office tenancies with shared meeting rooms and other facilities are proposed to accommodate the office

needs of the warehouse tenancies. Floorplates have been designed to be flexible and reconfigurable to suit the needs of future tenants.

Lift and service cores are provided between the office and warehouse areas to service both components of the site. The western side of the warehouse tenancies is provided with additional lift cores and pedestrian opportunities to ensure good connectivity to the office.

Supporting the office component are a number of amenity facilities, such as a café, gymnasium and EOTF within the undercroft car park area for future workers, as well as a rooftop garden above the office building.

The gym, EOTF and rooftop garden will be available on a 24/7 basis, consistent with the primary warehouse and distribution use. These spaces will only be available for use by employees of the development, providing amenity on site throughout the working day.

Café

A café space is located on the ground floor within the lobby of the office building. Given that a tenant for the café has not yet been selected, the exact operating hours are not yet known. However, it is anticipated that this will operate generally in accordance with regular office hours and will be accessible to all tenants and visitors to the site. Specific operating provisions for the café, including detailed fitout, will be subject to a separate development consent.

3.2.3.4. Stormwater Management

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

3.2.3.5. Transport and Parking

Construction

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

Operation

On Burrows Road, the site proposes 3 vehicular crossovers:

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

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

3.2.4. Development Timing

3.2.4.1. Construction Staging and Phases

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

- Site preparation, earthworks / piling, and footing (CC1).
- Public Art Plan approval, inground services, and structure (CC2).
- Façade, services, and fit out (CC3).
- Landscaping and external works (CC4).
- SAS conditions, public domain, and public art (CC5).

The tasks required in the second and third phases can be undertaken partly concurrently, providing an overall construction programme of approximately 18 months. Site establishment is anticipated to commence in Q3 2023 (subject to development approval).

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 (EPBC Act)*
- *NSW Biodiversity Act 2016 (BC Act)*
- *Environmental Planning and Assessment Act 1979 (EP&A Act)*
- *Environmental Planning Assessment Regulation 2021 (EP&A Regulation)*
- *State Environmental Planning Policy (Planning Systems) 2011 (Planning Systems SEPP)*
- *State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience and Hazards SEPP)*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021 (Transport and Infrastructure SEPP)*
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021 (Biodiversity and Conservation SEPP)*
- *Sydney Local Environmental Plan 2012 (SLEP 2012)*

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 6 categorises and summarises the relevant requirements in accordance with the DPIE *State Significant Development Guidelines*. A detailed statutory compliance table for the proposed development is provided at **Appendix B**.

Table 6 Identification of Statutory Requirements for the Project

Statutory Relevance	Action
Power to grant approval	In accordance with clause 12 of Schedule 1 of the <i>State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP)</i>, development with a capital investment value of greater than \$30 million that is for the purpose of a warehouse and distribution centre, at one location and related to the same operation, is classified as SSD: 12 Warehouses or distribution centres (1) <i>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</i> (2) <i>This clause does not apply to development for the purposes of warehouses or distribution centres to which clause 18 or clause 19 applies</i> (3) <i>In this section—</i> relevant amount means—

Statutory Relevance	Action
	(a) for development in relation to which the relevant environmental assessment requirements are notified under the Act on or before 31 May 2023—\$30 million, or (b) for any other development—\$50 million. The proposed works have an estimated CIV of \$206,410,000 million (excl. GST) (refer Appendix G), and are for the purposes of a multi-level warehouse and distribution facility. Accordingly, the proposal is SSD for the purposes of the SRD SEPP.
Permissibility	The site is zoned IN1 General Industrial in accordance with the <i>Sydney Local Environmental Plan 2012 (SLEP 2012)</i>. The proposed development constitutes a 'warehouse or distribution centre', which is defined as follows: <i>warehouse or distribution centre</i> means a building or place used mainly or exclusively for storing or handling items (whether goods or materials) pending their sale, but from which no retail sales are made, but does not include local distribution premises. The proposal comprises a warehouse and distribution centre (47,076sqm) which is permitted with consent in the IN1 Zone. The proposal also includes 5,014sqm of office space ancillary to the main warehouse operations. The café ('food and drink premises') is permitted with consent within the IN1 zone and will operate as a standalone operation for public use, as well as catering to the needs of the on site population. Planning Circular PS 21-008 ('How to characterise development') outlines that an ancillary use is a use that is subordinate or subservient to the dominant purpose on the land. Therefore, the office component is permitted by virtue of being ancillary to the warehouse and distribution centre as the primary land use. In addition, the gymnasium facilities adjacent to the undercroft car park, as defined under the 'recreational facility (indoor)' definition, while prohibited in the zone is ancillary to the primary 'warehouse and distribution centre' use, subservient to the extent of providing amenity to the warehouse and distribution centre employees on-site.
Other approvals	<i>Water Management Act 2000</i> Pursuant to section 4.41 of the EP&A Act, SSD is exempt from requirements for a water use approval (section 89), a water management work approval (section 90) or an activity approval (other than an aquifer interference approval) (section 91) of the Water Management Act 2000. The Geotechnical / Soil Salinity Investigations undertaken by PSM and the earthworks proposed by Costin Roe would be a maximum depth of RL 2-2.3, which would not impact upon the groundwater levels which range between RL -1.8 to 0.8m.

Statutory Relevance	Action
	<i>Roads Act 1993</i> Section 138 of the <i>Roads Act 1993</i> requires the consent of the relevant Road Authority for work in, on, under or over a public road. The proposal includes new driveway crossings off Burrows Road for vehicular entry to the site and access for the fire brigade off Canal Road. Burrows Road is a local road, therefore Council is the Road's Authority. Canal Road is a regional / State Road, therefore the consent authority is TfNSW. Approval is therefore sought from under section 138 of the Roads Act for the proposed driveway crossings. <i>National Parks and Wildlife Act 1974</i> The NPW Act aims to prevent the unnecessary or unwarranted destruction of relics and the active protection and conservation of relics of high cultural significance. The provisions of the Act apply to both indigenous and non-indigenous relics. Pursuant to Section 4.41 of the EP&A Act, SSD is exempt from the need for a section 90 permit for the removal of items of Aboriginal heritage. An Aboriginal Cultural Heritage Assessment Report (ACHAR) has been prepared by Artefact to assess the site's sensitivity and consider any potential impacts associated with the proposed development (Appendix EE). The assessment found that the study area was assessed as having nil-low archaeological potential to retain intact archaeological deposits that may contain Aboriginal objects. Therefore, no further archaeological investigation is recommended. <i>Biodiversity Conservation Act 2016</i> Clause 7.9 of the BC Act 2016 applies to SSD applications and requires SSD applications to be accompanied by a BDAR unless it is determined the proposal is not likely to have any significant impact on biodiversity values. Accordingly, a BDAR Waiver application has been prepared to request the requirement to submit a BDAR is waived under clause 7.9(2) of the <i>Biodiversity Conservation Act 2016</i>. A BDAR Waiver was granted by DPE on 24 October 2022 and is attached at Appendix S.

4.2. PRE-CONDITIONS

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

Table 7 Pre-Conditions

Statutory Reference	Pre-condition	Relevance	Section in EIS
<i>State Environmental Planning Policy (Transport and Infrastructure) 2021 (Transport and Infrastructure SEPP)</i>			
Section 2.119 – Development with frontage to classified road	A consent authority must not provide development consent on land fronting a classified road unless it is demonstrated that access, safety, and efficiency of the development will not impact this classified road and the type of development is not sensitive to traffic noise or vehicle emissions.	Primary access to the site is via Burrow Roads, not the classified Canal Road, with access, pedestrian and vehicular safety, as well as the efficiency of truck movements designed to minimise impact to the classified road frontage. A single crossover from Canal Road is proposed for the purpose of fire services and some utilities access to the site. This crossing would only be used by Fire & Rescue NSW in an emergency situation and as such would not impact traffic movements on Canal Road. Given the site is a warehouse and distribution use, the development will not be affected by traffic noise or vehicle emissions.	Section 6.1.3
Section 2.122 – Traffic-generating development	A public authority, or a person acting on behalf of a public authority, must not approve traffic-generating development without written notice of the intention to carry out the development to TfNSW in relation to the development, and taken into consideration any response to the notice that is received from TfNSW within 21 days after the notice is given.	The site has access to Canal Road, a classified road, and a site area of 34,614m², greater than the nominated 5,000m². The proposed development is therefore considered traffic-generating under SEPP Transport and Infrastructure. The application will be referred to TfNSW and will take into consideration	Section 3.1

Statutory Reference	Pre-condition	Relevance	Section in EIS
		matters listed in their response.	
<i>Stat Environmental Planning Policy (Resilience and Hazard) 2021 (Resilience and Hazard SEPP)</i>			
Section 2.10 – Development on land within the coastal environment area	Given the site is within a coastal environment area, the consent authority must not provide consent unless it has considered whether the proposal will have an adverse impact on the quality, resilience, or biodiversity elements present in the zone.	A small portion of the eastern part of the site is within the coastal environment area. The proposed development is not likely to cause an adverse on the outlined coastal elements. Refer to Appendix B for additional justification. As confirmed in the Civil Report, the proposed development will utilise sediment basins, sediment fences, and stabilised site accesses to limit risk of sediment adversely impacting the Alexandra Canal. During operation, any stormwater will either be treated or harvested for re-use onsite, incorporating principles of WSUD to mitigate any potential stormwater impacts on surrounding waterways.	Section 6.1.2, Section 6.1.7, Section 6.1.9, Section 6.2.5, Section 6.2
Section 2.11 – Development on land within the coastal use area	The consent authority should not provide development consent unless satisfied the proposed development has considered the likelihood to cause an adverse impact on the amenity and access to foreshore and coastal areas, and is satisfied that if any impacts are present, sufficient mitigation measures are in place to manage them.	A small portion of the eastern part of the site is within the coastal use area. The proposed development is not likely to cause an adverse on the outlined coastal elements. Refer to Appendix B for additional justification.	Section 6.1.2, Section 6.1.7, Section 6.1.9, Section 6.2.5, Section 6.2
Section 4.6 – Contamination and remediation to be considered in determining	A consent authority must be satisfied that the land is suitable in its contaminated state – or will be suitable, after remediation – for the	Potential sources of contamination exist at the site but are not expected to preclude the proposed development of the site. As	Section 6.1.11

Statutory Reference	Pre-condition	Relevance	Section in EIS
development application	purpose for which the development is proposed to be carried out.	discussed in Section 6.1.11 the Phase I & II ESA with subsequent SAS confirm that the site can be made suitable for a commercial/industrial development provided the recommendations of the AECOM RAP are implemented. It is noted that, as concluded in the SAS, further investigation of the site is required to address data gaps with an addendum for the RAP potentially needed if the remedial strategy requires changing.	
State Environmental Planning Policy (Industry and Employment) 2021 (Industry and Employment SEPP)			
Section 3.6 – Granting of consent to signage	<i>A consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied—</i> <i>(a) that the signage is consistent with the objectives of this Chapter as set out in section 3.1(1)(a), and</i> <i>(b) that the signage the subject of the application satisfies the assessment criteria specified in Schedule 5.</i>	The proposed signage is appropriate and consistent with the objectives and requirements of Section 3.6 and Schedule 5 of <i>State Environmental Planning Policy (Industry and Employment) 2021</i> .	Appendix B

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 8 Mandatory Considerations

Statutory Reference	Mandatory Consideration	Section in EIS
Consideration under the EP&A Act and Regulations		
Section 1.3	Relevant objects of the EP&A Act	Appendix B

Statutory Reference	Mandatory Consideration	Section in EIS
Section 4.15	<u>Relevant environmental planning instruments:</u>	
	▪ Planning Systems SEPP	Section 1 & Appendix B
	▪ Resilience and Hazards SEPP	Section 6.1.11, Appendix B & Appendix BB
	▪ Transport and Infrastructure SEPP	Section 6.1.3, Appendix B & Appendix O
	▪ Biodiversity and Conservation SEPP	Appendix B & Appendix S
	▪ Sydney Local Environmental Plan 2012 (SLEP 2012). It is noted that the proposal seeks to vary the FSR standard of 1.5:1 under clause 4.4 of the SLEP 2012 by a total of 0.0066:1 (0.44% exceedance). A Clause 4.6 Variation Request has been prepared which justifies the minor GFA exceedance sought.	Appendix B Appendix II & Section 6.1.1.3
	<u>Relevant draft environmental planning instruments:</u> N/A	N/A
	<u>Relevant planning agreement or draft planning agreement:</u> N/A	N/A
	<u>Development control plans:</u> Sydney Development Control Plan 2012 (SDCP 2012)	Appendix B
	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 & 7
	The public interest	Section 7
Mandatory relevant considerations under EPIs		
Resilience and Hazards SEPP	Chapter 4 requires a consent authority to be satisfied prior to granting consent that land requiring remediation can be made suitable for the purpose of the proposed development.	Section 6.1.11, Appendix B & Appendix BB
Transport and	Part 2.3, Division 17 'Roads and Traffic', Subdivision 2 'Development in or adjacent to road corridors and road reservations', clause 2.119 applies to development with a	Section 6.1.3, Appendix B & Appendix O

Statutory Reference	Mandatory Consideration	Section in EIS
Infrastructure SEPP	frontage to a classified road. The site has a boundary to Canal Road which is a classified road.	
	The proposed development constitutes traffic-generating development in accordance with clause 2.121 and Schedule 3 of the SEPP. The proposed development requires referral to TfNSW as it includes car parking for more than 200 cars and the site has an area of 34,614sqm (more than 8,000sqm, and the site area is less than the gross floor area).	Section 6.1.3, Appendix B & Appendix O
Sydney LEP 2012	Objectives and land uses for IN1 General Industrial Zone in conjunction with: Part 4 – Principal development standards Part 5 – Miscellaneous provisions Part 6 – Local Provisions (clause 6.57 1-3 Burrows Road, St Peters) Part 7 – Additional local provisions	Appendix B
Considerations under other legislation		
<i>Biodiversity Conservation Act 2016</i> (BC Act) – section 7.14	The likely impact of the proposed development on biodiversity values as assessed in the Biodiversity Development Assessment Report (BDAR) Waiver Request. A Waiver was subsequently granted by DPE on 24 October 2024. 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 6.2.5 Appendix S
Development Control Plans		
<i>Sydney Development Control Plan 2012</i> (SDCP)	Clause 2.10 of the Planning Systems SEPP states that development control plans (whether made before or after the commencement of this Policy) do not apply to SSD. As such, there is no requirement for assessment of the proposal against the SDCP 2012 for this SSDA. Notwithstanding this, consideration has been given to the following provisions: Section 2 – Locality Statements Section 5 – Specific Areas 5.8 – Southern Employment Lands Section 6 – Specific Sites	Appendix B

Statutory Reference	Mandatory Consideration	Section in EIS
	6.3.19 – 1-3 Burrows Road, St Peters	
Development Contributions Plan		
City of Sydney Development Contributions Plan 2015	Section 94 contribution rate of \$4,443 per additional worker within the Southern Employment Lands, indexed at the time of payment.	Appendix B

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 if the project is approved.

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:

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

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

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

This engagement was consistent with the community participation objectives in the *Undertaking Engagement Guidelines for State Significant Projects* and complies with the community engagement requirements in the SEAR 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 (including the Western Parkland City Authority for development within the Western Parkland City).*
 - *the community.*

- *if the development would have required an approval or authorisation under another Act but for the application of s 4.41 of the EP&A Act or requires an approval or authorisation under another Act to be applied consistently by s 4.42 of the EP&A Act, the agency relevant to that approval or authorisation.*

In accordance with the Regulations, the EIS will be placed on formal public exhibition once DPIE 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 the community and key stakeholders are summarised in the table below. A detailed community engagement table is provided as which details the way in which these issues have been addressed in the EIS.

Table 9 Key Stakeholder Feedback

Key Issue	Respondent	Applicant Response
Strategic Context		
None relevant		
Project and Any Alternatives Considered		
Question regarding how the project is addressing ESD.	City of Sydney	The applicant addresses ESD through the following key measures: ▪ 5-star green star rating and 5.5-star NABERS rating for office. ▪ Implementation of WSUD initiatives such as bioswales and additional water filtration from ramps / rooftop garden. ▪ 2,000 kWp PVs - fully offset building in peak during the day. ▪ LED lighting - 60-80% reduction in lighting usage. ▪ 5% EV charging points for all carparks upfront. ▪ Rainwater harvesting. ▪ Net Zero embodied carbon - manufacturing, procurement & construction. Life Cycle Assessment (LCA) undertaken to measure embodied carbon to be offset at completion of project (when as-builts done). Further details of the ESD measures are included at Appendix R.
Traffic generation and approach to assessment	City of Sydney	▪ Goodman and Traffic Consultant (Ason) is meeting with TfNSW to agree adoption of reduced generation rate in line with generation rates adopted for comparable developments.

Key Issue	Respondent	Applicant Response
		Modelling will be micro-simulation and extent of modelling agreed subject to 1 additional intersection.
Question regarding noise with aircraft noise and vehicle ramp noise mitigation for office / occupants needs to be considered	City of Sydney	The applicant will consider noise with aircraft noise and vehicle ramp noise mitigation for office / occupants.
Visual impact of ramp	Bayside Council	- A significant majority of the trees within the public domain will be retained. These trees will provide good visual screening and softening of the built form from the public domain. - An additional 6m landscape setback will be provided along the site boundary along Canal and Burrows Rd, from the current nil setback. - Several species capable of growing approx. 30m high will be included within the landscape setback, including endemic trees and plants which will provide significant screening and softening to the built form once mature. - The landscape strategy includes approx. 15% of the site as canopy coverage and deep soil planting.
Visual Impact of Burrows Road Façade	Bayside Council	- It is noted that the proposal was subject to a City of Sydney Architectural Design Competition, with the winning scheme awarded to Welsh and Major in April 2022. The winning scheme was selected by the Jury Panel, which included 1 x Govt Architect representative, 2 x City of Sydney and 2 x proponent (Goodman) representatives - The Competition process requires the ultimate SSD architectural scheme to be consistent with the competition winning scheme. This limits the scope for any redesign of the winning scheme, including for example 'breaking up' the façade as proposed by Bayside Council. - It should be noted the 'Design Integrity Panel' reviewed and endorsed the SSD architectural scheme on 18 August 2022 as being consistent with the competition scheme. - The proposed façade design is iconic in design and visually attractive. It will include horizontally expressive facade components and strong cornice-like fascia to accentuate the length and sweep of the building along

Key Issue	Respondent	Applicant Response
		Burrows Road and create visual interest and articulation. - The articulation of the facade is provided both in geometry and materials, with a vertical break-up of the façade through utilising three (3) materials along equal third bands to help reduce perception of bulk and scale. - The building facade contributes strongly to the placemaking and contribution to the public domain - providing a canvas for a programmable light art, to be curated to reflect the concepts of change and movement.
Potential heavy vehicle traffic impact on local roads	Bayside Council	- The proposal is speculative, with future tenants not yet known. The required freight routes are also therefore not yet known. However, as the site is zoned 'IN1-General Industrial' to support 'warehouse and distribution' use, access flexibility is required to ensure the facility operates effectively. - Proposed trade routes will utilise the existing approved routes for 20m articulated vehicles from Port Botany, Sydney Airport, Mascot Industrial Precinct on Coward Street and local roads
Potential impact on Mascot Town Centre	Bayside Council	- Future tenant access requirements are yet unknown and access flexibility is required. - Goodman will continue to consult and provide progress updates to Bayside Council and offer the opportunity to comment / provide feedback on plans.
Relevant Statutory Issues		
EOTF and bike parking provisions	City of Sydney	- The facility is 5-star green star targeted. - Goodman is considering benchmarking the provision of EOTF and bike parking off DCP rates (for bike parking & EOTF).
Contamination must be considered and verification of watertable intrusion must be provided by a site auditor	City of Sydney	Phase 1 & 2 completed - phase 2 still relevant. SAS B & RAP will form part of application. Given the depth of excavation proposed (i.e. to RL 2-2.3m), the works are unlikely to hit the watertable (at RL -1.8-0.8m). If interaction with the water table occurs, a management plan will be prepared within the existing RAP to address any concern.

Key Issue	Respondent	Applicant Response
		Capping method proposed involving importation of fill following cut and fill earthworks.
Use of office space	Bayside Council	- The proposed office component will be ancillary to, and in support of the primary purpose of the facility for 'warehouse and distribution' use. - No standalone office use will be accommodated within the facility.
Community Engagement		
None relevant		
Economic, Environmental and Social Impacts		
Comments on the public art costing and alternative treatments if the primary strategy becomes unviable	City of Sydney	- Public art component to include light fitting and will therefore likely exceed 1% benchmark for CoS. - Goodman is considering ongoing piece of art strategy - moving into future for CoS events etc.
Traffic and accessibility impact assessment reporting	Transport for NSW	Ason Group have completed a Transport Management and Accessibility Plan, attached at Appendix O. The report provides SIDRA intersection modelling, swept path assessment, and a design review of the site in line with the relevant Australian Standards. A Preliminary Construction Traffic Management Plan has been provided detailing general principles and likely traffic impact during the construction period.
Requirement of an air quality assessment	NSW Environment Protection Authority (EPA)	An Air Quality Impact Assessment (AQIA) has been prepared at Appendix T . The applicant has provided the EPA with a copy of this assessment.
Justification and Evaluation of Project as a Whole		
None relevant		
Issues Beyond Scope or Not Relevant to Project		
None relevant		

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:** it is proposed to consult with the following stakeholders during the post-approval phase of the project:
 - Local community
 - Relevant agencies
 - Local councils, including:
 - City of Sydney Council
 - Bayside Council
 - Inner West Council
 - The applicant 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 on the project website and through a letterbox drop, and
 - Enabling the community to seek clarification about the project through the 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.
- Providing methods for monitoring and opportunities for the community to give feedback to help inform the planning process.
- 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.
- Clearly outlining the negotiables and non-negotiables and the level of effect as a result of feedback.
- Managing expectations by closing the feedback loop by 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 B**).
- Proposed mitigation measures for the project which are additional to the measures built into the physical layout and design of the project (**Appendix C**).
- Community engagement table identifying where the issues raised by the community during engagement have been addressed (**Appendix D**).

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. Built Form, Design Quality and Urban Design

Competition winning architects Welsh and Major have prepared a Design Report which is provided at **Appendix H**. The Design Report sets out the project vision, design quality objectives, the design excellence process and how it has been achieved, site analysis and how the proposed design approach responds to the site context and how the proposal addresses key statutory controls.

The Design Report is accompanied by the Designing with Country Visual Design Report, Landscape Design Statement, Public Art Strategy and the Lighting Concept which have been prepared by the design team.

6.1.1.1. Existing Environment

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

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

6.1.1.2. Potential Impacts

Design Excellence and Design Integrity

In accordance with *Better Placed* and clause 6.21 of SLEP 2012, Welsh and Major have demonstrated that the proposal achieves design excellence (refer to Design Report at **Appendix H**). As noted in **Section 1.4.2** of the EIS, the proposal has also been subject to an extensive Competitive Design Alternatives Process and a rigorous design integrity review process to ensure design excellence is achieved.

The key design elements supported by the Jury in the winning competition scheme which have been retained and refined to achieve design excellence are outlined below. After winning the competition, Welsh and Major continued to develop the scheme in partnership with Goodman, to resolve matters raised in the Jury's feedback, incorporate input from the ongoing Designing with Country process and collaboration with other members of the design team, as well as achieve coordination with technical advice. Where appropriate, key considerations addressed during this process are also highlighted below.

In summary, the key defining design elements and refined components of the scheme include:

- The overall singular sweeping built form and façade along the Burrows Road frontage which provides a strong conceptual response to the context and scale of the site.
- The facade simplicity, consistency and composition, in particular the interlocking corners, the strong pre-cast base, the clean edge of the top fascia and the silver materiality. These components articulate the scale of the building and provide a strong resolution. The façade design has been further refined in terms of materiality, incorporating the interlocking façade at additional building junctions and improving the expression and performance of the office façade.
- The façade public lighting strategy – the façade lighting has been further developed including integrating with the Designing with Country response and the public art strategy.
- The strong sense of arrival created at the vehicle and office entry by pulling the office building over the access point, integrating the function of the broader development.
- The strong Connection to Country outcome has been created through the water narrative and landscape which have been extended throughout the site. Ongoing collaboration has occurred with Yerrabingin to ensure that Designing with Country has underpinned design development.
- The large spiral ramps create a more sculptural expression at the northern and southern ends of the site which incorporate green roofs and landscaping to soften their appearance.

As outlined in **Section 1.4.2**, the refined scheme was presented to the DIP on 4 August 2022, where some additional items were raised for further consideration and resolution. Welsh and Major's response to these items as derived from the Design Report are as follows:

- **Designing with Country**

- A continuation of the Designing with Country process has included further integration with the expression of the foyer materials, landscape design and planting selections and the art strategy. The process continued with obtaining feedback on the design from aboriginal elders and designers and is proposed to continue into the future through ongoing engagement with community.

- **Colour and Materiality**

- Further consideration of materiality has refined the selection of facade materials including cladding panel materials and elements such as downpipes, as well as the use of colour themes across the proposal.

- **Landscape design**

- Further development of an integrated landscape design proposal that reflects and heals Country, champions biodiversity and water sensitive urban design, and creates rich landscape spaces along the street and extends these through and around the site.
- Development of the rooftop garden design to create a sweeping raised garden bed that provides an integrated and expressive solution to soil depth requirements for successful planting.

- **Facade development**

- The cornice of parapet proportions and expression has been refined across all facade types to strengthen the continuity of this element while allowing for variations to adjust to the requirements of each application. Cross-sectional details are provided as part of the submission.
- Solar loads to office facades have been analysed to guide development of sunscreening and glazing performance.
- The north-west corner of office building has been further developed to express the sharp profile edges of each of the meeting facade types, creating a recessed pocket with visual depth and intermittent planting.
- The western elevation concrete base panelling has been further refined to accommodate openings and using these to further articulate the base.

- **Amenity - breakout spaces for people**

- Further development of the foyer design proposal to provide a kiosk style cafe and seating for 50 patrons that will activate the building entry.
- Further development of the rooftop pavilion and roof bushtucker garden to provide for flexible use including break-out spaces.
- Creation of small seating alcoves along Burrows Road for workers and passing pedestrian to retreat into the landscaped zone.

- **Maintenance Strategy**

- Building maintenance access provisions have been developed to ensure access for landscape and building maintenance. Irrigation for landscaping is provided through rainwater capture and reuse.

Following this presentation, the DIP commended the design team on the progression of the design and noted the refined design retains design excellence, and in many areas, delivers an improvement from the competition winning scheme. The DIP was satisfied with the level of resolution and design development as maintaining the design integrity from the competition (refer **Appendix K**).

Overall, it is considered that the proposed development provides for a high level of design quality and will have a positive impact on the site, streetscape and broader locality.

6.1.1.3. Layout and Design

The layout and design have been carefully considered to provide an improved visual outcome and efficient utilisation of the site. The design approach for the development has carefully considered the nature of the warehouse and distribution centre typology which has a large form and massing that will be viewed differently in varying contexts and seeks to celebrate the scale of the building.

The overall built form massing is modulated by the different building elements across the site including the warehouse (east and west components), central breezeway and two large spiral circulation ramps situated in the northern and southern portions of the site which celebrate vehicular movement through the site and separate the warehouse forms, and the office building situated in the north-eastern corner and entrance to the site.

The building incorporates an extensive 260m (approximate) curved façade to the Burrows Road frontage which references the sweep of the Alexandra Canal and road shape. The western edge of the office building is carved out to respond to and wrap around the northern ramp. The office lobby is recessed and “sleeved” by the vehicle entrance to accentuate the sense of arrival to the site in the north-eastern corner.

A 6 metre landscape setback is provided to both the Burrows and Canal Road frontages which accommodates extensive tree canopy planting, shrubs, groundcovers and break out gathering spaces. This breaks up and softens the built form as it presents to the respective street frontages and public domain, providing an improved pedestrian experience.

Additional landscaping is provided throughout the site including green roofs and planting within both spiral ramps which soften the scale and provide visual interest to these large structures, whilst also improving the edges of the site, particularly in the northern portion of the site underneath and adjacent to the office lobby.

Overall, the proposed built form celebrates the scale of the building in an industrial setting. The horizontally expressive and simplistic façade design is articulated through geometry and carefully selected materiality. The façade adopts three distinct components, being a strong pre-cast concrete panel base, FC sheet panel to the mid-section of the warehouse and aluminium panel at the top which resolves to the clean cut tilted fascia around the whole building. The office is delineated through the recessed lobby and façade design which includes perforated aluminium screens over the performance glazing.

The lineal expression of the facade continues along the western and northern warehouse providing an articulated backdrop to the facade lighting artwork. On the north east corner twin sprinkler tanks and the vehicular ramp create counterpoints to the long mass of the warehouse. The massing of the building is viewed on these edges from an elevated perspective with the building sitting into the ground.

The building façade contributes to placemaking and improving visual interest to the public domain by incorporating programmable lighting into the public art strategy with a strong connection to Country.

Figure 13 Proposed built form context analysis (artist's impressions)



Picture 21 View along Burrows Road from the north-eastern corner of the site



Picture 22 View towards the corner of Canal Road and Burrows Road from the south-east

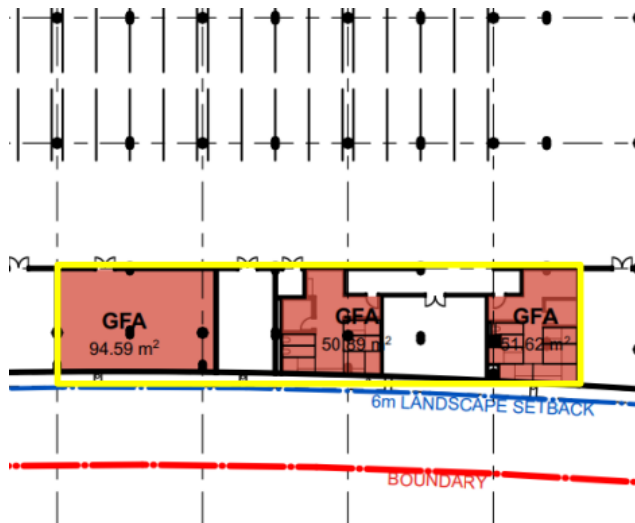
Source: Welsh and Major

As discussed previously in **Section 4.3 (Table 8)** of this EIS, the proposal seeks to vary the FSR standard of 1.5:1 under clause 4.4 of the SLEP 2012 by a total of 0.0066:1 (0.44% exceedance) or 229sqm. The areas of the built form resulting in the exceedance are the end of trip and gym facilities located within the undercroft area and office waste room on ground level of the warehouse.

These areas are set within the built form extent of the floorplate and allowable setback to Burrows Road. These areas are also located largely below ground level and do not increase the bulk of the built form. The

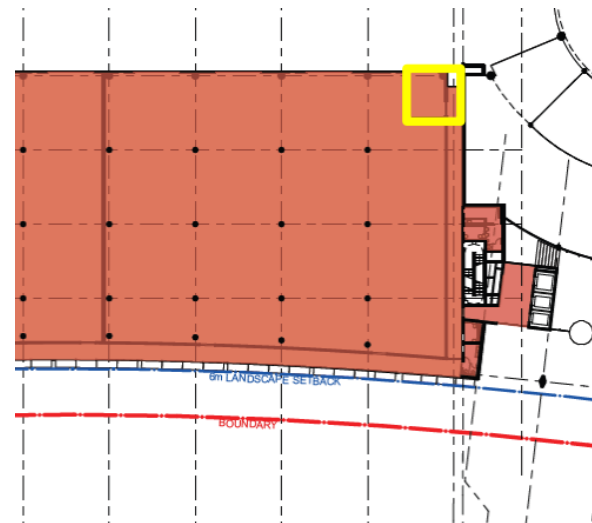
design makes use of these spaces for the benefit of future occupants that would otherwise be non-GFA generating.

Figure 14 Areas of the built form resulting in GFA variation – outlined in yellow



Picture 23 Undercroft GFA Floor Plan (extract)

Source: Welsh and Major



Picture 24 Warehouse Ground Level GFA Plan (extract)

A Clause 4.6 Variation Request has been prepared which justifies the minor GFA exceedance sought (**Appendix II**). The Clause 4.6 Variation demonstrates compliance is “unreasonable or unnecessary” in this case given the proposed development achieves the objectives of the FSR development standard, notwithstanding the non-compliance with the standard (refer *Table 2 of Appendix II*).

Specifically, it is noted that the minor GFA exceedance will not compromise the proposal providing significant economic benefits and employment generation within the Eastern Economic Corridor and will contribute to the growth of the freight and logistics network in south Sydney. In fact, it will provide for efficient floorspace provision that contributes to economic benefits and effective use of the site by providing facilities which attract and retain staff and tenants. It also provides for waste storage areas that do not reduce or impact upon the provision of efficient warehouse and ancillary office floorplates.

In addition, the Clause 4.6 establishes that there are sufficient environmental planning grounds to justify the proposed variation to the development standard in clause 4.3(2) of the SLEP 2012 because the variation:

- Promotes or is consistent with the objectives of the EP&A Act, to the extent those objectives are applicable.
- Does not hinder the proposals consistency with the zoning objectives and the FSR objectives, including the intent of the FSR development standard.
- Proposes a very minor contravention, being 0.0066:1 in terms of FSR and 229m² in terms of GFA (0.44%). The areas resulting in the contravention are internal to the established building envelope and are below ground level for the most part.
- Does not compromise the development’s consistency with the objectives for development on land in the IN1 General Industrial zone.
- Enables the provision of benefits to end users / future building occupants and contributes to the delivery of economic benefits.
- Does not compromise the developments compatibility with the existing and emerging industrial character of St Peters and does not itself result in any built form and massing impacts.
- Does not itself result in any additional overshadowing or view impacts considering the areas resulting in the contravention are in subsurface and interior floor areas of the built form.

The identified environmental planning grounds are sufficient to justify the FSR exceedance in the circumstances of the case.

6.1.2. Visual Impact

A Visual Impact Assessment (VIA) has been prepared by Urbis and is attached at **Appendix N**. The VIA has been prepared to analyse the visual effects of the built form proposed on public domain views for key locations surrounding the site. The VIA has been prepared in accordance with SEARs item 5.

6.1.2.1. Existing Environment

The surrounding visual context immediately to the north of the site is occupied by the St Peters WestConnex Interchange which features numerous at grade and raised motorway lanes. Further north is the heritage listed St Peters Anglican Church and a residential neighbourhood comprising largely single storey brick dwellings. Sydney Park is also situated to the north of the site with undulating topography and mature vegetation. The north-west corner of the park contains heritage listed kilns and chimneys that act as prominent visual markers in the immediate surrounding area.

Low rise industrial and commercial buildings are situated to the east of the site along Burrows Road. Alexandra Canal and the B6 zoned Enterprise Corridor land are situated further to the east.

Several new mid and high-rise missed use and residential buildings are situated to the south of the site. The surrounding streetscapes are tree lined with some pedestrian and cycle lanes and is visually permeable. Further south of the site is Sydney Kingsford Smith Airport. The airport contains numerous large buildings and terminals around the northern edges of the site.

To the west of the site is Canal Road, a four laned road connecting the Princes Highway with Alexandra Canal. Adjacent to Canal Road is Goodman's St Peters business park which is generally low-rise large industrial buildings. The Maritime Container Services site is situated to the north of the business park.

Intervening built-form and vegetation largely obstructs views of the site beyond the immediate streetscape. Views from significant public recreation space including Sydney Park are also largely obstructed by intervening vegetation and built-form.

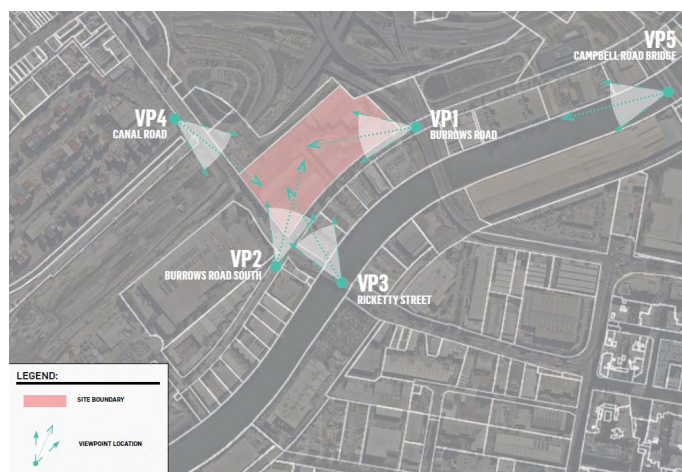
The surrounding visual catchment and public domain views are predominantly restricted to close views from the surrounding streetscape including Burrows Road, Canal Road, Ricketty Street and WestConnex to the north / west.

6.1.2.2. Potential Impacts

Following fieldwork, Urbis selected and recommended five view places for further analysis via the use of objective visual aids. Photomontages from these five selected viewpoint locations were prepared to inform the analysis in the VIA (refer **Figure 15**). All viewpoints are classified as close and medium views with regards to distance class.

The VIA analyses the public domain view place sensitivity, visual absorption capacity and the development's compatibility with urban contact and visual character to determine the overall significance rating of visual impact from each of the selection viewpoint locations.

Figure 15 VIA viewpoint locations



Source: Urbis

The proposed development is situated within the context of a mix of infrastructure, industrial and commercial built forms. The development site will be most visible from the immediately surrounding streetscapes of Burrows Road and Canal Road.

Urbis concluded that all five viewpoints assessed were rated as having low visual impact within the visual catchment of the surrounds. The VIA determined that:

- The overall rating of significance of visual impacted is rated as low for all five of the assessed viewpoints.
- Viewers from the surrounding streetscape will be a combination of both pedestrians and vehicle users, with most users being within a moving vehicle which decreases the viewing time.
- The proposal predominately only blocks views of open sky beyond and does not block visual access to scenic or highly valued compositions or heritage items. The proposed development also does not obstruct views of any scenic or highly valued features in the landscape.
- While the scale of the proposed development is greater than other buildings in the immediate vicinity, it is of a consistent scale of built form, infrastructure and commercial uses in the surrounding landscape including significant infrastructure to the north and a variety of built form of varying scales to the east.

The VIA does not identify the need for any mitigation measures to be incorporated into the current design of the development. It is noted that the proposal has been through a rigorous competitive design process, as well as an iterative and ongoing design integrity and review process with the DIP.

The scheme prepared by Welsh and Major is considered capable of exhibiting design excellence and incorporates an extensive landscaping strategy which softens the built form and edges of the site. To this point, Urbis note in the VIA that the proposed retention of existing boundary vegetation (where possible), and the proposed mature tree planting (predominantly along the Burrows and Canal Roads frontages) and ramp landscaping treatments, will filter views of the built form, particularly at the lower levels of the development.

Overall, taking all relevant factors into consideration, the VIA considers the significance of visual effects that would be caused by the proposed development are reduced and the proposal is acceptable with regards to potential visual impacts.

6.1.3. Traffic, Transport and Accessibility

A Transport Management & Accessibility Plan (**TMAP**), including a Green Travel Plan (**GTP**) and Preliminary Construction Traffic Management Plan (**CTMP**), has been prepared by Ason Group and is provided at **Appendix O**. The TMAP has assessed the potential transport related impacts of the proposed development during the construction and operational phases of the project in accordance with SEARs item 6.

6.1.3.1. Existing Environment

The site currently operates on a 24-hour basis, 7 days a week. Access to the site is currently provided via two access points directly from Burrows Road, one in the north-east corner and one part way along the eastern frontage.

The road network surrounding the site includes a mix of State, regional and local roads, including the St Peters WestConnex interchange which sits adjacent to the west of the site. Burrows Road is a regional / local road with 1 lane of through traffic and a speed limit of 50km/h. Canal Road is a State road which has 2 lanes in each direction, increasing to 3 lanes at the intersection with Princess Highway and a speed limit of 60km/h.

The site is well serviced by local public transport infrastructure and is in proximity to rail services from Mascot Station and bus services along the surrounding road network. The site also benefits from an extensive pedestrian network and a well-connected mixture of recreational, sub-regional and local bicycle routes within the City of Sydney and Bayside LGAs.

An 8-hour survey undertaken of the existing vehicular crossovers found that during network peaks, the site generates 10 vehicle movements for the AM peak and 22 vehicle movements for the PM peak which is negligible. The existing breakdown of vehicle classification on-site was found to be 97% light vehicles, 3% heavy vehicles (rigids), 0% articulated vehicles.

6.1.3.2. Potential Impacts

Access

The proposal seeks to alter the vehicular access arrangement to and from the site, and provides the following vehicle access (refer **Figure 16**):

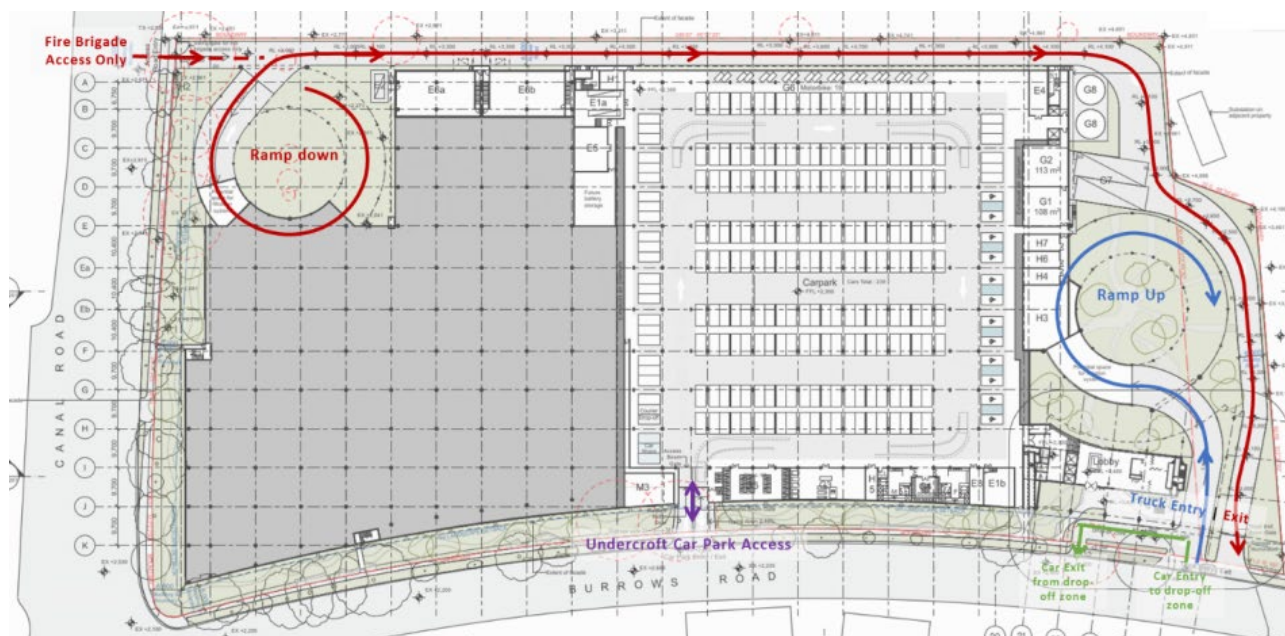
- A single car park access to the undercroft car park (light vehicle in and out movements).
- A crossover that accommodates separate truck entry and exit movements, with the entry portion also serving as an entry driveway for the drop-off area (truck and light vehicle in, truck out movements).
- A separate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

The proposed access arrangements clearly delineate light and heavy vehicle access to reduce the potential for conflict between different vehicle classes and user groups.

A dedicated access driveway is provided to the undercroft parking area part way along the Burrows Road frontage which will accommodate most light vehicle movements to and from the site. Truck access is provided via dedicated entry and exit driveways situated in the north-east portion of the site away from the undercroft accessway. The truck access incorporates a median separator to minimise conflicting movements and allowing for pedestrian refuge.

Access to the drop-off zone is shared with the truck entry driveway. This allows for a continuous loop for the drop-off area, mitigating the need for reverse movements within the drop-off zone and minimising the number of vehicular crossovers on Burrows Road. This layout also separates the drop-off and truck exit driveways which further assists in minimising conflicts between different vehicle classes. These crossover arrangements are compliant with relevant Australian Standards.

Figure 16 Proposed access / egress arrangement



Source: Welsh and Major – as marked by Ason Group

Parking Provisions

Car and Motorcycle Parking

The site is classified as *Category F* under the SLEP 2012 Public Transport Accessibility Level Map. In accordance with the relevant maximum parking rates outlined in clause 7.8 of the SLEP 2012, the proposal provides 224 car parking spaces within the undercroft carpark area for warehouse and office / retail uses. This includes the provision of 12 accessible parking spaces in accordance with SDCP 2012 requirements for 1 space every 20 carparking spaces (or part thereof).

It is estimated that the number of staff expected to be on-site at any one time is approximately 225 warehouse staff. The proposed parking provisions are therefore suitable to support the expected number of on-site workers.

A total of 19 motorcycle spaces are provided within the undercroft carpark in accordance with the relevant SDCP 2012 rates which require 1 motorcycle space for every 12 car parking spaces (based on 224 parking spaces for warehouse and office / retail uses).

Service Vehicle Parking

17 service vehicle parking spaces are provided in the undercroft carpark, including 2 spaces for office servicing and 15 spaces for warehouse servicing.

Whilst this falls short of 54 services spaces technically required under the SDCP 2012 for warehouse uses, service vehicle parking will be managed by direct servicing to the front of the warehouse tenancies utilising the breezeway hardstand areas on each warehouse level for setdown and unloading.

Bicycle Parking and End of Trip Facilities

The proposal provides the following bicycle parking provisions and end of trip facilities in accordance with the relevant rates outlined within the SDCP 2012:

- Office premises:
 - 33 spaces for employees (1 per 150sqm)
 - 13 spaces for visitors (1 per 400sqm)
- Warehouse premises:
 - 23 spaces (1 per 10 staff based on 225 staff)
- Retail (café) premises:
 - 2 space for employees
 - 2 spaces for visitors
- Total – 73 spaces
- Lockers – 58
- Showers and changerooms – 14 shower and change cubicles including 2 accessible cubicles

The bicycle parking spaces and end of trip facilities are located along the eastern edge of the undercroft area in proximity to the gym and office building lobby providing easy access for those using these amenities. The 10 visitor bicycle parking spaces are located with easy access to the carpark entrance, whilst the other five visitor spaces are located adjacent to the office building lobby within the public domain area.

Access, Movement and Parking Design

Ason have undertaken an assessment of the architectural drawings prepared by Welsh and Major and determined that the proposal has been designed in accordance with relevant Australian Standards. It is expected that compliance with the relevant Australian Standards will form a standard Condition of Consent on any approval issued.

The design review noted the following in particular:

- The proposed internal roads, ramps, and warehouse hardstand area on each level of the development has been designed to accommodate access and circulation requirements for vehicles up to a 20m Articulated Vehicle.
- Swept path assessments have been undertaken and demonstrate the suitability of the proposed site arrangement to accommodate the nominated vehicles.
- Burrows Road access – entry driveway designed for light vehicles accessing the dedicated drop-off zone and heavy vehicles up to 20m Articulated Vehicles accessing the ramp towards the multi-level warehouse. Exit driveway designed for heavy vehicles up to 20m Articulated Vehicles exiting the Site.

- Canal Road access – entry driveway designed for fire brigade (up to 12.5m in length).
- The internal ramps have been reviewed, with ramp grades and lengths which are in accordance with the requirements of AS2890.1:2004 and AS2890.2:2018.
- The initial review of the parking spaces finds the spaces are compliant with AS2890.1:2004 and AS2890.6:2009, with parking spaces designed in accordance with a User Class 1A specification and accessible spaces designed accordingly.
- Service areas and bicycle parking provisions have been designed in accordance with relevant Australian Standards.
- In line with Fire and Rescue NSW (FRNSW) Guidelines, access arrangements for the Site have been tested for a 12.5 m HRV, demonstrating sufficient access for ‘Specialist’ fire appliances.

Operational Traffic Generation

The traffic impacts of the proposed development have been assessed having regard for the *RMS Guide to Traffic Generating Developments Updated Traffic Surveys TDT 2013/04a 2013* (RMS Guide Update), as well as the adopted trip rates based on an average of the Survey Site 3 and 4 rates following engagement with TfNSW. Traffic generation associated with the proposed development is outlined in the following table.

Table 10 Traffic Generation

Period	Total Vehicle Movements	Light Vehicles	Rigid Vehicles	Articulated Vehicles
AM Peak	164	139	17	8
PM Peak	155	132	16	8

The proposed development is expected to generate a total of 164 net vehicle trips in the AM peak hour and a total of 155 net vehicle trips in the PM peak hour during operation.

Aimsun and SIDRA Network models have been developed for the base year (2022) and the future years (2031). It is important to note that planned / committed future network changes for geometric configurations have been checked and geometric configuration maintained exactly similar between base year (2022) and future year (2031) modelling scenarios in both Aimsun and SIDRA assessment.

SIDRA intersection modelling has been undertaken as part of the TMAP to understand the impact of development trips for three scenarios, base case (2022), base case (2031) and project case (2031). The key findings for the 2031 Project Case scenario outlined that:

- the net effect of the development trips on the study network is minimal, with all modelled intersections (except for Princes Highway / Canal Road which would slightly improve) maintaining their projected future Level of Service and Degrees of Saturation largely unchanged compared to 2031 Future Base.
- The Gardeners Road / Bourke Road intersection would further deteriorate in the AM peak and the DoS would increase from 0.94 to 0.97 but maintain to operate at acceptable delay (LoS D).
- The Gardeners Road / O’Riordan Street and Princes Highway / Campbell Road intersections would continue to operate at LoS F in the corresponding peak periods with higher delays compared to the 2031 Future Base.

Ason have concluded that under the development scenario, nearby intersections continue to operate similar to future base conditions or operate at acceptable degrees of saturation and delays.

Accordingly, the Proposal will not be required to deliver any additional upgrades to the surrounding road network and will operate satisfactorily through existing infrastructure.

Construction Traffic Management

A Preliminary Construction Traffic Management Plan (CTMP) has been prepared to establish the broad traffic principles for construction that would minimise traffic impacts on the surrounding road network, ensure

safety and efficiency for workers, pedestrians, and road users, and provide information regarding construction vehicle access routes and any changed road conditions (if applicable).

The construction work will vary depending on the phase of construction and associated activities. However, works will generally be undertaken during standard construction hours and are likely to be as follows:

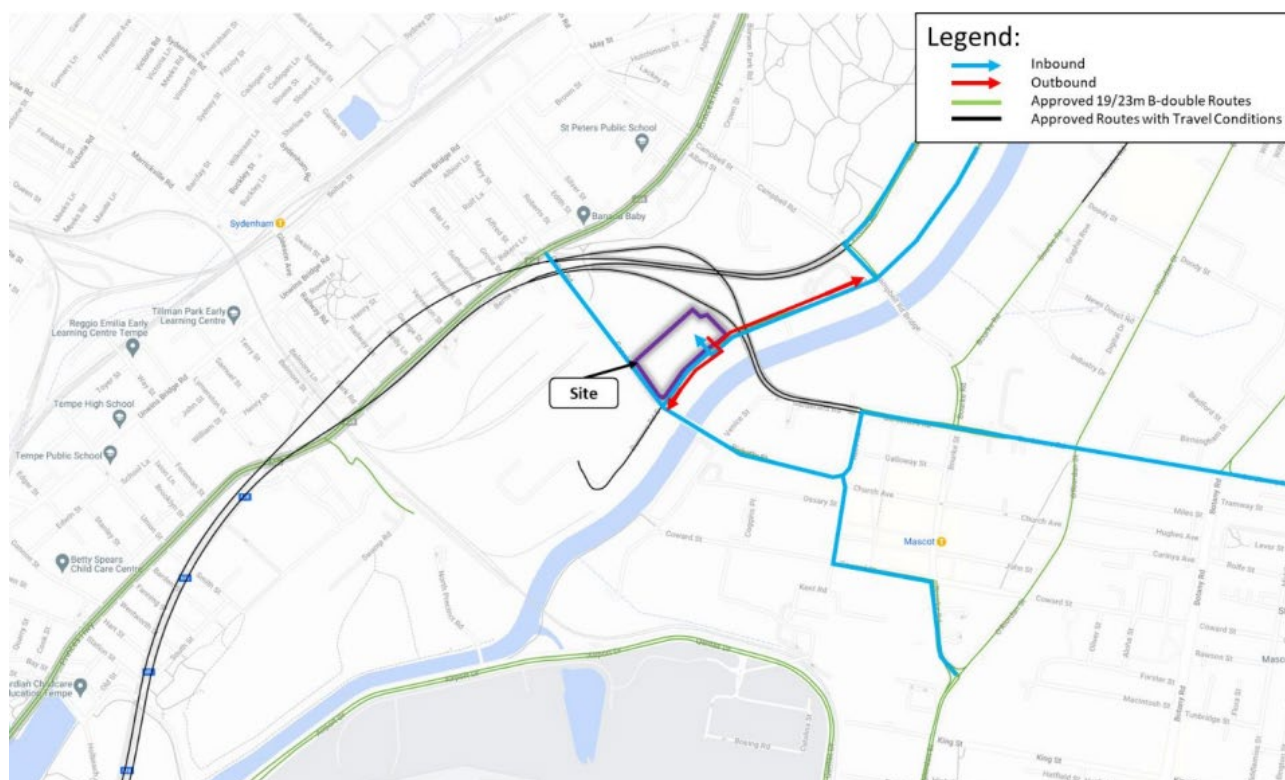
- Monday to Friday: 7.30AM to 5:30PM.
- Saturday: 7.30AM to 3.30PM.
- Sunday and Public holidays: No planned work.

Access is proposed to be provided to all construction vehicles via the existing crossovers on Burrows Road. The routes shown in **Figure 17** are to be utilised by all construction vehicles and represents the shortest route, minimising the impacts of construction on the local and regional road network. 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.

Any vehicles required to access the site that do not comply with the mass, dimension or operating requirements as specified by the National Heavy Vehicle Regulator (**NHVR**) will need to apply for a class 1 Oversize Over-mass (**OSOM**) permit.

It is expected that construction traffic will be substantially less than the future operational traffic and will therefore not have any unacceptable impacts on the surrounding road network more broadly.

Figure 17 Proposed construction vehicle routes



Source: Ason Group

Green Travel Plan

A preliminary Green Travel Plan (**GTP**) has been prepared by Ason and is included at *Section 10* of the TMAP (refer **Appendix O**). The GTP aims to prioritise active and public transport methods over private car usage and includes site-specific measures to promote and maximise the use of sustainable travel including walking, cycling and public transport.

The primary objectives of the future finalised GTP will be to:

- Reduce the environmental footprint of the development.

- Set future staff travel mode share targets.
- Improve access, amenity, convenience, and safety of sustainable transport modes to/from the Site.
- Promote the use of 'active transport' modes such as walking and cycling, particularly for short-medium distance journeys.
- Reduce reliance on the use of private vehicles for all journeys.
- Encourage a healthier, happier, and more active & public transport use culture.

The GTP provides an audit of the locality to determine the existing public transport services and active transport facilities in the area, as well as current modal split associated with travel to/from the area. The GTP sets out targets and strategies to be implemented in the future in order to reduce car dependency, seeking to achieve mode share targets. By 2026 the GTP proposes an 18% reduction in car usage for drivers.

6.1.3.3. Mitigation Measures

Ason Group have concluded that no additional road or infrastructure upgrades are required, and the proposal will not result in any adverse impacts on the surrounding road network or availability of on-street parking.

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

6.1.4. Trees and Landscaping

Taylor Brammer have prepared a detailed set of Landscape Plans (**Appendix P**) and a Design Statement (attached to the Design Report at **Appendix H**) which outlines the landscape concept design and key design principles.

An Arboriculture Impact Assessment (**AIA**) has been prepared by Civica (**Appendix Q**) which assesses the existing trees on the site and makes recommendations for trees to be removed and retained to facilitate the proposed development.

6.1.4.1. Existing Environment

The AIA and tree survey undertaken by Civica identified a total of 59 existing trees within and adjacent to the site with the potential of being impacted by the proposal. This includes 18 within the site and 41 located outside the site.

Most of the trees located within the site were a mix of relatively young or mature plantings and ranged from good to fair health and structure, all of which were assumed to have been planted.

Most of the larger trees, all of which were Australian Native, were located on the perimeter of the site.

The site has no trees identified as being of national, state or local heritage significance. The site trees were considered common species in the local area and hold limited botanical significance. It is also noted that no trees were found on the site listed within the City of Sydney Significant Tree Register.

6.1.4.2. Potential Impacts

Tree Removal

Trees on and in the vicinity of the proposed development, including relevant trees on neighbouring lots, were assessed by carrying out a visual examination to determine their characteristics including their species, estimated age, health, structural condition, useful life expectancy (**ULE**) and viability within the landscape. Retention values were then applied to each tree based on a modified version of the British Standard which prescribes four categories, A, B, C and U.

- Category A – trees are a site constraint and may require alterations to the proposed development to or specific measures to allow retention. There are 8 Category A trees across the site.
- Category B – trees are a site constraint consideration. Lesser changes should be considered to retain these trees. There are 18 Category B trees across the site.

- Category C – trees are not considered a site constraint. There are 30 Category C trees across the site.
- Category U – trees are considered a site opportunity, such as trees recommended for removal regardless of the proposed development. There are 3 Category U trees across the site.

The AIA provides the following recommendations with respect to existing trees within and adjacent to the site in order to accommodate the proposed development:

- 25 trees required to be removed, including:
 - 18 trees within the site – this comprises 3 Category A, 3 Category B, 11 Category C and 1 Category U (to be removed irrespective of development) trees which require removal due to significant protrusion into respective Tree Protection Zones.
 - 7 existing trees outside the site, including:
 - 3 trees located within the Burrows Road nature strip assumed to be managed by City of Sydney Council. These are identified as 1 Category B and 2 Category C and had to be removed due to encroachment into proposed footpath area.
 - 2 Category U trees located within the Canal Road nature strip assumed to be managed by City of Sydney Council which should be removed due to advanced decay and poor structure (Category U trees).
 - 2 trees located on the neighbouring north-western property boundary both of which are Category C trees. These trees are within the proposed building envelope approved under PP-2020-298 and considered for removal as a component of the proposal. At the time of assessment for the AIA it was unclear if the trees were located in the WestConnex land to the northwest. It has been confirmed subsequently that these trees are located in the north WestConnex lot.
- 34 trees have been identified as being retainable and will require generic / specific measures during construction to ensure they remain viable following completion of works.

Of the 25 trees recommended for removal, it is noted that the majority of these are either trees with a retention value of Category B, C or U (22 in total). Only three trees recommended for removal are classified as Category A trees.

For the trees proposed for removal outside of the site area, land owner's consent is to be obtained and provided to DPE post-lodgement from the City of Sydney and Transurban.

The AIA finds that the proposed warehouse and distribution centre would not result in any adverse impacts to the retained trees subject to the implementation of mitigation measures identified in the section below.

Landscaping

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

This is realised by the planting strategy for the proposed development which applies extensive greening and urban tree canopy planting across the site. The proposed tree planting strategy **proposes to install over 100 trees to offset the 26 trees proposed to be removed**. These trees have the capacity to grow to over 10m in height and additional tree planting is proposed which will grow to under 10m in height at maturity.

Most tree species are Paperbarks (*Melaleuca quinquenervia*) that were characteristic of the place in pre-colonial times. These trees are supplemented with native Eucalypts and shrubs.

In addition, the proposal includes extensive shrub and ground cover plantings incorporated with gathering spaces. Most planting is situated within the two 6-metre landscape buffers to the Burrows and Canal Roads frontages.

This extensive urban canopy replenishment proposal will substantially improve the vegetation canopy and amenity across the site and for the area through its implementation and establishment. The proposed tree planting will suitably offset the trees proposed for removal.

Overall, the proposal will provide a total landscape area of 7,341sqm or 21.2% of the site, including 14.9% deep soil and 14.7% tree canopy coverage. In addition, the proposal provides 1,423sqm of green roof area at the office roof terrace and on top of the ramp roofs.

6.1.4.3. Mitigation Measures

The AIA identifies both specific and generic mitigation measures for the trees proposed to be retained. With regards to specific measures, Civica have outlined the following measures for trees 45 and 51, and street tree 26, as they have proposed demolition and excavation within the respective TPZ:

- Excavation / grade changes including level raising (for Tree 26 retention) is to be carried out only under arborist supervision and should not occur within the SRZ of these trees. Excavation should commence at the outer extent of the TPZ and move inwards to minimise potential root damage.
- Works should be undertaken using techniques that are sensitive to tree roots to avoid unnecessary damage (refer to *paragraph 8.3.3 of Appendix Q* for specific techniques).
- Machine excavation is prohibited within the TPZs of retained trees unless undertaken at the direct consent of the project arborist.
- Roots discovered are to be treated with care and minor roots (<40mm diameter) pruned with sharp, sterile handsaw or secateurs.
- Proposed surfacing within the TPZ is to be installed above the existing grade and be of a permeable nature to allow the passage of air and moisture.

Civica have also set out the following generic mitigation measures which relate to all trees proposed to be retained across the site:

- Restricting certain activities within the TPZ.
- Protective fencing.
- Trunk and ground protection.
- Tree protection signage.
- Involvement from the project arborist.
- Project milestones.
- Compliance reporting.
- Offset tree planting (previously discussed above).

Following implementation of the above mitigation measures on the trees recommended for retention, the proposed development will be in accordance with the Australian Standard AS 4970-2009: *Protection of Trees on Development Sites*.

6.1.5. Ecologically Sustainable Development

A ESD Report has been prepared by SLR Consulting and is attached at **Appendix R**. The ESD Report identifies how ESD principles have been incorporated into the design and ongoing operation, exceed the relevant industry standards for sustainability and environmental performance, as well as minimising emissions and resource consumption. As such, Item 8 of the SEARs is adequately addressed as detailed below.

6.1.5.1. Incorporating ESD Principles

The ESD principles, as defined in clause 7(4) of Schedule 2 of the *EP&A Regulation*, are:

- (a) *the precautionary principle,*
- (b) *inter-generational equity,*
- (c) *conservation of biological diversity and ecological integrity,*

(d) improved valuation, pricing and incentive mechanisms.

Through the implementation of a range of ESD initiatives, the proposal seeks to mitigate against any negative environmental social, and economic impacts associated with the development. Strategies which have been committed to and implemented in order to achieve these outcomes include:

- Meeting or exceeding NCC Section J1 and J2 façade performance requirements for conditioned spaces.
- Light coloured roofing and appropriate insulation to reduce solar heat gain.
- Performance glazing in office spaces.
- Flexibility of space for potential future configurations.
- Use of low Volatile Organic Compounds (**VOC**) paints, carpet sand sealants.
- Landscaping and dense planting.
- 5% of total parking space fitted with electrical car chargers.
- Accommodating small car and motorbike as well as bicycle parking into the parking area.
- Office envelope and Heating, Ventilation, and Air Conditioning (**HVAC**) system to meet thermal comfort requirements.
- Strategically install light fixtures to minimise energy consumption.
- Ventilation will be supplied in accordance with AS1668 and Buildings 5-star Green Star.
- LED lighting, daylight harvesting and lighting controls to warehouse and office areas.
- Solar hot water or heat pump system.
- Sub metres for major energy/water use.
- The applicant has committed to measuring, reducing and offsetting upfront embodied carbon on all developments as of 1 July 2021, which involves use of material with a favourable lifecycle assessment based on:
 - Fate of material
 - Recycling / re-use
 - Embodied energy
 - Biodiversity
 - Human health
 - Environmental toxicity
 - Environmental responsibility
- At least 90% of the predicted construction waste arising from development will be reused (on-site or at another development) or recycled offsite.
- Water efficient bathroom facilities, kitchen facilities, and landscaping.
- Rainwater collection for toilets, irrigation and truck wash down.
- Achieve a 40% reduction in average annual stormwater discharge
- At least 2,000 kW of PV system has been proposed to the rooftop of the warehouse.
 - Note: Assuming the occupant operations are within an ambient environment, the PV array will offset all power usage during the middle of the day. Given operation is 24/7, the development will also rely on power from the network as required. Further detail on the specifications and overall power usage offset will be articulated throughout the detailed design phase of the project.

Through these initiatives, the applicant is committed to achieving a 5-star green star rating for the proposed development and 5.5-star NABERS rating for the office component, all in pursuit of upholding the principles of ESD and creating an equitable and high-quality development.

6.1.5.2. Exceeding Industry Standards

An National Construction Code (NCC) Section J Deem-to-Satisfy building is used as the baseline building for energy consumption savings. It is predicted that the proposed development will exceed the Section J minimum requirements, having more than a 213% energy reduction. This reduction is enabled by:

- Onsite Photo-Voltaic (PV) solar system to 2,000kW.
- All luminaire shall be low energy LED type.
- Warehouse lighting is generally to be zonally controlled via motion sensor and daylight harvesting.
- Office lighting shall be controlled via dual technology infrared/ultrasonic sensor.
- Daylight harvesting function to office with external windows.
- Efficient air conditioning system.

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

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

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

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

6.1.5.3. Minimising Emissions and Resource Use

By implementing all energy efficiency measures described above including the proposed PV solar system the project will significantly minimise greenhouse gas emission reflecting the goal to achieve net zero emissions.

The project is predicted to achieve a 213% GHG emission reduction with a 2,000kW rooftop PV system to significantly offset the energy draw of the building during the middle of the day, when compared with 2019 NCC Reference Building.

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

6.1.6. Air Quality

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

6.1.6.1. Existing Environment

Individuals at the industrial/commercial receptors noted in **Figure 18** could potentially experience air quality impacts due to the demolition and construction works at the Site. The nearest residential receptors are located approximately 500 m to the northwest of the Site boundary.

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

Figure 18 Surrounding Receptors



Source: SLR Consulting

To understanding the air quality context, data from the WestConnex operated ambient air quality monitoring station (**AQMS**) located adjacent to the east of the Development site since June 2020 was utilised. It is noted that the M8 and M4-M5 tunnel ventilation outlets were in operation in this period and that the ambient monitoring data recorded at this station would include contribution from these ventilation outlets. Given this, the use of this dataset as the existing background level is conservative.

Ambient monitoring data recorded from the AQMS revealed the following:

- No exceedances of the relevant maximum 1-hour and annual average NO₂ criteria were recorded in the 2021 calendar year. The highest 1-hour average NO₂ concentration of 76 µg/m³ was recorded on hour 11 of 1 September 2021.
- Exceedances of the relevant 24-hour average PM_{2.5} criterion were recorded on five days in 2021 (Refer to **Figure 17**). Analysis of the data showed that the recorded PM_{2.5} concentrations for two of these days was greater than the PM₁₀ concentrations for those days, indicating an instrumental/database error. Other exceedances were recorded on 27th April, 4th May and 21st August 2021. However, there were no exceedances recorded for the regional compliance monitoring at Randwick on these three days, which is an indication that these exceedances were likely to be caused by some localised source(s). Recorded annual average PM_{2.5} concentration at the Saint Peters 2 AQMS was well below the relevant criterion.
- No exceedances of the maximum 24-hour or annual average PM₁₀ criteria were recorded in 2021. The highest 24-hour average PM₁₀ concentration of 41 µg/m³ was recorded on 29th October 2021.

Figure 19 Data Recorded on Days of Exceedances

Date	24-Hour Average Concentrations ($\mu\text{g}/\text{m}^3$)	
	PM _{2.5}	PM ₁₀
27-04-2021	27.9	33.6
03-05-2021	32.5	31.2
04-05-2021	27.8	30.6
21-08-2021	29.9	35.7
22-08-2021	39.0	35.2
Criteria	25	50

Source: SLR Consulting

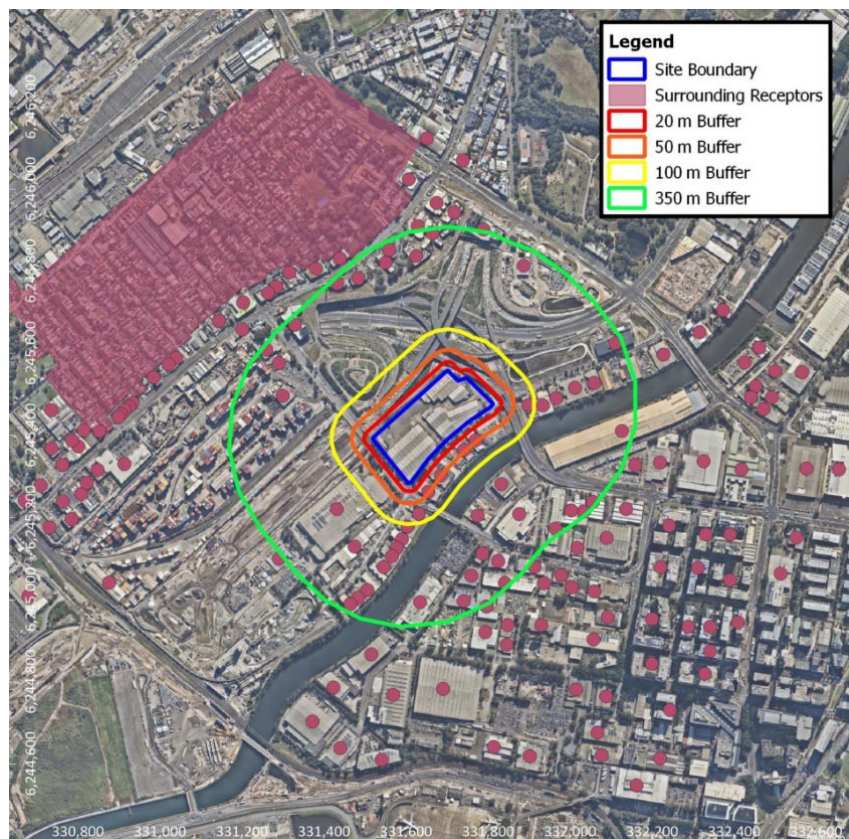
6.1.6.2. Potential Impacts

Construction Impact

The *IAQM Guidance on the Assessment of Dust from Demolition and Construction* has been utilised to assess the potential impacts to air quality from construction works. As outlined in **Figure 20**, screening of the site has located more than 100 sensitive receptors within 350m of the site boundary. The dust emission magnitude expected for each phase of construction has been detailed in **Figure 21**. Considering the expected emission magnitudes and the surrounding area, the area has been classified as having a low sensitivity to dust soiling and health effects.

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

Figure 20 Density of Sensitive Receptors in Vicinity of the Site



Source: SLR Consulting

Figure 21 Categorisation of Dust Emission Magnitude

Activity	Dust Emission Magnitude	Basis
Demolition	Large	IAQM Definition: Total building volume >50,000 m³, potentially dusty construction material (e.g. concrete), on-site crushing and screening, demolition activities >20 m above ground level. Relevance to this Project: <i>The total area of the buildings to be demolished is approximately 20,600 m²; considering an average height of 3.4 m, the total demolition volume is approximately 70,000 m³.</i>
Earthworks	Large	IAQM Definition: Total site area greater than 10,000 m², potentially dusty soil type (eg clay, which will be prone to suspension when dry due to small particle size), more than 10 heavy earth moving vehicles active at any one time, formation of bunds greater than 8 m in height, total material moved more than 100,000 t. Relevance to this Project: <i>Total area of the Site is estimated to be approximately 35,000 m².</i>
Construction	Large	IAQM Definition: Total building volume greater than 100,000 m³, piling, on site concrete batching; sandblasting. Relevance to this Project: <i>The total warehouse area is 16,000 m² and the elevation of the building is 31.6 m. Therefore, the total building volume will be 340,000 m³.</i>
Trackout	Large	IAQM Definition: More than 50 heavy vehicle movements per day, surface materials with a high potential for dust generation, greater than 100 m of unpaved road length. Relevance to this Project: <i>It is estimated that more than 50 heavy vehicles movements per day will occur during the peak construction period.</i>

Source: SLR Consulting

Operational Impact

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

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

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

The potential impact of the proposed development on the local sensitive receptors is concluded to be neutral for all receptors.

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

- No exceedances of the relevant ambient air quality criteria for NO₂ would be expected at the ground and elevated levels of the proposed building.
- No exceedances of the relevant ambient air quality criteria for PM₁₀ would be expected at the ground and elevated levels of the proposed building.
- Few exceedances of 24-hour average PM_{2.5} guideline were predicted at the ground and elevated levels of the proposed building. Further investigation showed that these exceedances are driven by high background levels. The incremental concentrations from the ventilation outlets are negligible on these days compared to the background PM_{2.5} level recorded at the Saint Peters 2 AQMS. The predicted results also showed that the contribution from the ventilation outlets is unlikely to cause any additional

exceedances at any levels of the proposed building. Predicted incremental annual average PM2.5 concentrations showed compliance with the relevant criterion at all levels of the proposed building.

- Given the predicted minimal incremental impact associated with the operation of the ventilation outlets and conservative assumptions adopted for this assessment, any changes to the above conclusion are unlikely with the increase in annual average daily traffic in future (eg. 10 year horizon).

6.1.6.3. Mitigation Measures

Construction

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

- Soft strip inside buildings before demolition (retaining walls and windows in the rest of the building where possible, to provide a screen against dust).
- Ensure effective water suppression is used during demolition operations. Handheld sprays are more effective than hoses attached to equipment as the water can be directed to where it is needed. In addition, high volume water suppression systems, manually controlled, can produce fine water droplets that effectively bring the dust particles to the ground.
- Avoid explosive blasting, using appropriate manual or mechanical alternatives.
- Bag and remove any biological debris or damp down such material before demolition.

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

- Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place. (Construction)
- Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use. (Trackout)
- Avoid dry sweeping of large areas. (Trackout)
- Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport. (Trackout)
- Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable. (Trackout)
- Record all inspections of haul routes and any subsequent action in a site log book. (Trackout)
- Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned. (Trackout)
- Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable). (Trackout)
- Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits. (Trackout)
- Access gates to be located at least 10 m from receptors where possible. (Trackout)

A reappraisal of the predicted mitigated air quality impacts anticipates a low risk for demolition, and negligible for earthworks, construction, and trackout.

Operation

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

6.1.7. Noise and Vibration

A Noise Impact Assessment (NIA) prepared by SLR Consulting is provided at **Appendix U**. The NIA assesses the potential construction and operational noise produced by the proposed development as well as any recommended mitigation measures, satisfying the requirements of Item 11 of the SEARs.

6.1.7.1. Existing Environment

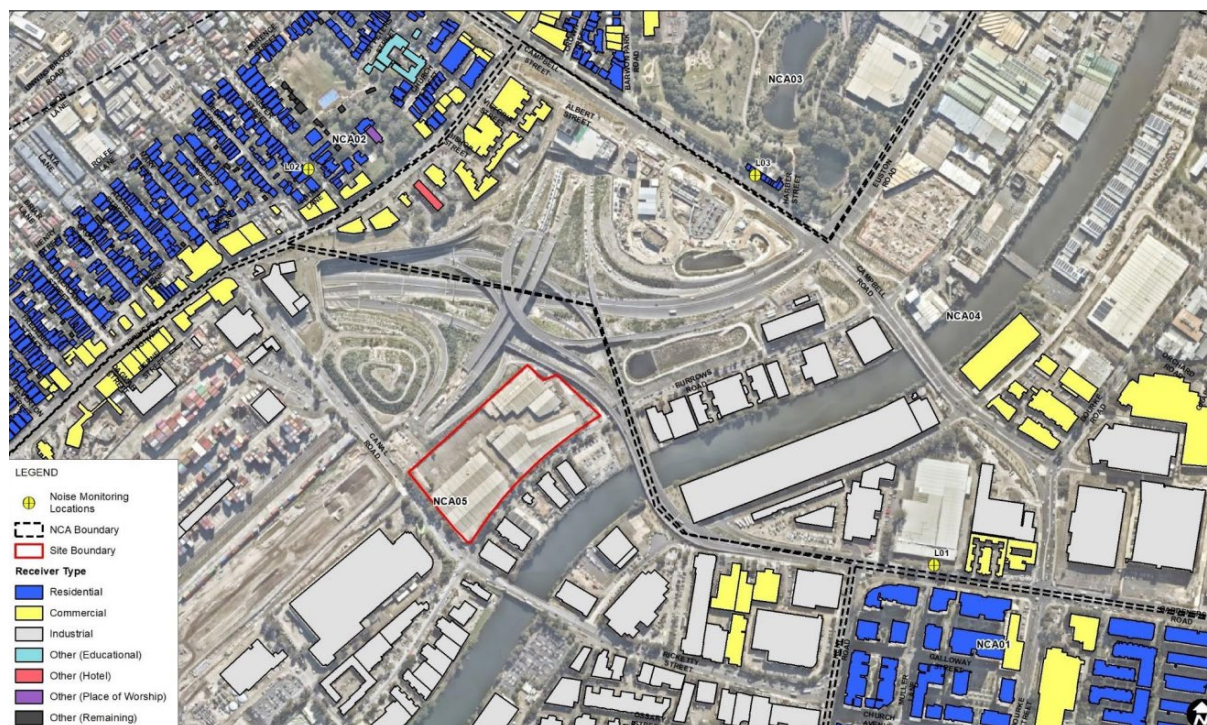
The nearest receivers to the proposed development are described in **Figure 22** and **Figure 22**.

Figure 22 Surrounding Sensitive Receivers

NCA	Direction	Distance (m)	Description
NCA01	Southeast	530	This NCA consists of mixed-use developments along Gardeners Road, which are typically multi-story residential towers with commercial uses on ground floor. Commercial and industrial receivers located in the western and northern areas of the catchment.
NCA02	Northwest	400	This NCA consists of residential and commercial receivers on Princes Highway. St Peters Anglican Church and St Peters Public School are in the north of the catchment.
NCA03	Northeast	400	This NCA consists of residential receivers along Campbell Road, with commercial receivers near Princes Highway.
NCA04	North	80	This NCA consists of mostly commercial and industrial receivers. Ibis Budget St Peters is on Princes Highway.
NCA05	South	30	This NCA consists of commercial and industrial receivers generally to the south of the site.

Source: SLR Consulting

Figure 23 Surrounding Land Use Context



Source: SLR Consulting

Unattended noise monitoring was undertaken in June 2022 to measure the existing noise environment. The results are set out in **Figure 24**.

Figure 24 Unattended Noise Monitoring Results

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

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

Source: SLR Consulting

6.1.7.2. Potential Impacts

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

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

Construction Noise

The predicted noise levels at the most-affected sensitive receivers are expected to be generally lower than the worst-case NMLs. The highest impacts are seen during work that uses noise intensive equipment such as rockbreakers with exceedances of up to 5-6dB (Refer to **Figure 25**). The residential receivers at NCA02 would be impacted by these disturbances, however, rockbreakers would only be required occasionally and unlikely to be used for long periods of time.

Figure 25 Predicted Construction Noise Exceedances

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

Source: SLR Consulting

Other minor exceedances of NMLs are between 3 and 4dB at the place of worship as a result of vegetation clearing and demolition, and 5dBs for the industrial NML during some noisy work scenarios (Refer to **Figure 25**).

It is noted that all the construction noise scenarios would only take place during standard daytime construction hours. There is no expectation for evening or night-time work to be required.

Beyond the potential noise impacts, potential sources of vibration from the proposed would likely be during:

- Construction of roads; and
- Demolition.

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

Figure 26 Construction Vibration Impacts



Source: SLR Consulting

Operational Noise

An assessment of the worst-case operational noise assessment against the relevant PNTLs revealed that the operational noise levels from the development are predicted to comply with the PNTLs at all identified sensitive receivers (Refer to **Figure 27**).

Figure 27 Operational Noise Assessment

Location	Receiver Type	Period	Noise Level LAeq(15minute) (dBA)			Compliance
			Noise Criteria	Predicted	Exceedance	
NCA01	Residential	Day	58	43	-	Yes
		Evening	53	40	-	Yes
		Night – heavy trucks	50	38	-	Yes
		Night – medium trucks	50	36	-	Yes
NCA02	Residential	Day	48	45	-	Yes
		Evening	48	41	-	Yes
		Night – heavy trucks	43	40	-	Yes
		Night – medium trucks	43	38	-	Yes
	Place of Worship	When in Use	48	45	-	Yes
	Educational	When in use	43	39	-	Yes
NCA03	Residential	Day	58	47	-	Yes
		Evening	53	44	-	Yes
		Night – heavy trucks	50	42	-	Yes
		Night – medium trucks	50	40	-	Yes
NCA04	Hotel	Day	63	47	-	Yes
		Evening	53	44	-	Yes
		Night – heavy trucks	48	42	-	Yes
		Night – medium trucks	48	39	-	Yes
-	Commercial	When in Use	63	49	-	Yes
-	Industrial	When in Use	68	59	-	Yes

Source: SLR Consulting

From an assessment against the predicted night-time maximum noise levels, all noise levels generally comply except for receivers close to the Princes Highway at NCA02 when truck airbrakes are used at the hardstands (Refer to **Figure 28**). The exceedance at this receiver is 3dBA. The NPfI, as such, requires a maximum noise level assessment to be completed.

Figure 28 Sleep Disturbance Assessment

Location	Receiver Type	Source	Maximum Noise Level L _{max} (dBA)			Below Screening Level
			Sleep Dist. Screening Level	Predicted	Exceedance	
NCA01	Residential	Heavy vehicle movements	62	50	-	Yes
		Heavy truck airbrake		56	-	Yes
		Forklift reversing alarm		43	-	Yes
		Roller door		32	-	Yes
NCA02	Residential	Heavy vehicle movements	54	49	-	Yes
		Heavy truck airbrake		57	3	No
		Forklift reversing alarm		44	-	Yes
		Roller door		33	-	Yes
NCA03	Residential	Heavy vehicle movements	62	49	-	Yes
		Heavy truck airbrake		57	-	Yes
		Forklift reversing alarm		44	-	Yes
		Roller door		33	-	Yes

Source: SLR Consulting

From an assessment of the maximum noise levels, the predicted maximum noise levels in NCA02 from infrequent truck airbrakes are expected to be below the levels outlined in the *Road Noise Policy (RNP)* that

would be considered to have the potential to result in sleep disturbance and are likely to be lower than existing maximum noise levels, which are dominated by existing road traffic noise from the nearby Princes Highway and St Peters Interchange.

Additionally, it is noted that the use of airbrakes during the night-time would likely be an infrequent event. It has also been conservatively assumed that airbrake events could occur anywhere within the hardstand areas, however it is expected that the majority of these would occur within the central hardstand area and therefore the receiver would experience additional noise shielding.

Any potential impacts from truck air braking is nullified by the proposed mitigation measures.

6.1.7.3. Mitigation Measures

Construction Impacts

The use of standard mitigation measures to minimise impacts is considered sufficient to control the majority of construction impacts. Specifically, a Construction Noise and Vibration Management Plan (**CNVMP**) must be prepared before any work begins.

Operational Impacts

Provided the 3dBA exceedance during the night-time maximum noise levels to NCA02, it is recommended that feasible and reasonable operational noise mitigation and management measures be considered. These measures are as following, noting that they are indicative and require design refinement:

- Use broadband and/or ambient sensing alarms on forklifts where they are required to reverse during the night-time.
- Appropriate specification and location of mechanical plant during detailed design.
- Appropriate design of warehouses during detailed design, including materials to minimise noise break-out.
- Keeping roller doors closed when loading / unloading is not occurring.
- Appropriate design of site layout to minimise the need for trucks to stop or break outside of loading docks with line of sight to residential receivers.
- Production of an Operational Noise Management Plan.

6.1.8. Ground and Water Conditions

A Geotechnical Investigation has been undertaken by PSM and included at **Appendix V** of this report. An additional Soil Salinity Investigation was also undertaken by PSM and is accompanied by a Salinity Management Plan (**SMP**), attached at **Appendix W**. The Civil Plans and Civil Engineering Report with Water Cycle Management Strategy provided by Costin Roe at **Appendix X** speak to the potential impacts on surface water and any mitigation measures to that end.

These technical investigations and management plan seek to assess the potential impacts on soil resources and groundwater from the proposed development, as well as the salinity and aggressivity of the soil units at the site. These inputs satisfy the requirements of item 12 of the SEARs.

6.1.8.1. Existing Environment

The 1:100,000 Sydney Geological map indicates that the site is underlain by quaternary alluvium, being peat and mud. Subsurface conditions and relative depths encountered during the review are as follows:

- Pavement (0m)
- Fill (0.2m to 0.3m)
- Upper sand (1.0m to 3.0m)
- Upper clay (2.8m to 5.2m)
- Lower sand (4.0m to 8.7m)
- Lower clay (7.9m to 10.7m)

- Bedrock A (10.4m to 13.5m)

The site is currently occupied by 3 single storey warehouses and up to two storey offices. The north-western portion of the site is paved with asphalt overlying a concrete slab, with the north-west of the site being covered with a concrete slab. Pavement is up to 300mm thick.

It is noted that the site is not affected by any overland flow paths, though overland flow paths are present along Canal Road and Burrows Road.

6.1.8.2. Potential Impacts

An analysis of the soil chemistry revealed the following:

- pH of the soil samples analysed was in the range of 7.8 to 8.6.
- The 1:5 soil to water extraction and subsequent electrical conductivity (EC1:5) of the soil samples analysed to be in the range of 153 $\mu\text{S}/\text{cm}$ to 429 $\mu\text{S}/\text{cm}$.
- Concentrations of chlorides in samples analysed was in the range of 10 mg/kg to 30 mg/kg.
- Concentrations of soluble sulphate in samples analysed was in the range of 20 mg/kg to 500 mg/kg.
- Cation Exchange Capacity (**CEC**) in samples analysed was in the range of 4.7 meq/100g to 18.4 meq/100g.
- Exchange Sodium Percentage (**ESP**) in samples analysed was in the range of <0.2 % to 3.0 %.

Subsequent investigations of the soil salinity classified the soil onsite as “slightly saline” to “moderately saline”. The site contains soils that are non-aggressive to mild in regard to aggressivity, noted as non-sodic with a ranging ESP of <0.2% to 3.0%.

From the bulk earthworks drawing provided with the civil plans attached at **Appendix X**, the proposed impacts to site soil include:

- Pad Bulk Earthworks Levels (**BEL**) at RL2m and RL5.20m AHD.
- Cut and fill comprised of (Refer to **Figure 29**):
 - 3m cut depth
 - 4m fill depth

The proposed development is seen to have no impact on soil resources, based on the following rationale from PSM:

- *“The site and surrounds have been industrial / commercial use for decades.*
- *The proposed development:*
 - *Does not alter the site use given that the proposed development is of industrial nature.*
 - *Includes importation of VENM/ENM fill to raise the existing levels.”*

It is noted that in regard to impacted infrastructure on site, all existing buildings will be demolished.

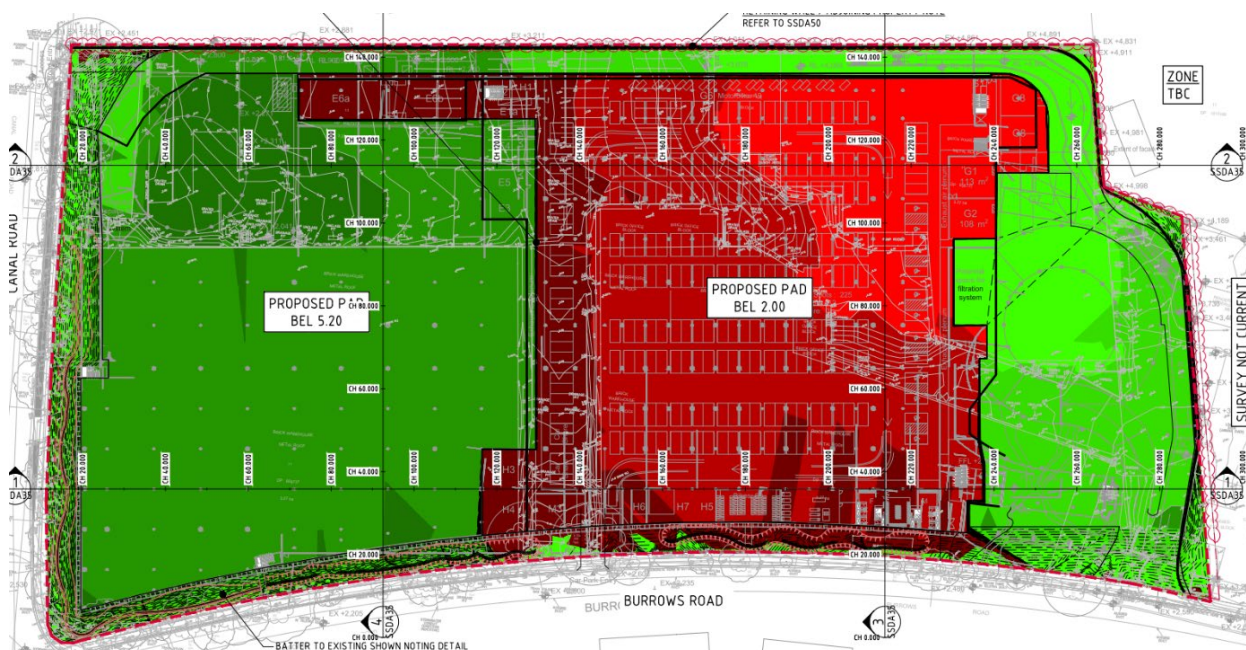
Based on a review of NSW Government Sharing and Enabling Environmental Data (**SEED**), the risk of acid sulfate soils is not assessed for the site.

Groundwater was encountered at a depth between RL -1.8m and RL 0.8m or between 1.6m and 4.0m below existing surface level.

In considering potential impacts on groundwater, it is noted that:

- Most of the site is subject to in-fill works which do not intercept the groundwater.
- The proposed pad located at the centre of the Site has localised areas in cut up to 3.0 m cut depth to RL 2.0 m where the groundwater is not likely to be encountered.

Figure 29 Cut and Fill Plan



Source: Costin Roe

6.1.8.3. Mitigation Measures

The proposed development will not excavate, discharge or have an impact on the existing groundwater supply.

Water discharge points for the proposed development are identified at two points along Burrows Road and both discharge to the existing stormwater line. To this, a series of Stormwater Quality Improvement Devices (**SQIDs**) have been integrated into the proposed development to meet the City of Sydney's surface water quality criteria:

- Pit inserts into all grated pits will serve as primary treatment to the parking roof and hardstand.
- Bio-retention swales have been located along the perimeter of the site to serve as tertiary treatment of any surface water.
- A portion of the roof will also be treated via rainwater reuse and settlement within the rainwater tank.

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

The site will be connected to the existing water and sewerage network to service the remaining water requirements of the site.

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

- Importation of soil
 - High saline or contaminated soils should not be imported to the site.
- Roads, footpaths and paved areas
 - Roads, footpaths and paved surfaces should be graded and maintain that grade to avoid ponding of surface water.

- Connections between the roads, footpath and paved surfaces and the surface water and stormwater drainage infrastructure should be designed, constructed and maintained to restrict infiltration into underlying soils.
- Provision for a damp-proof course or membrane beneath slabs should be considered by the slab designer.
- Landscaped area
 - Promotion of successful revegetation is likely to require use of nutrient rich topsoil. Saline topsoils should not be imported to site.
 - Potential waterlogging should be minimised by:
 - Adopting plant species with minimal watering requirements
 - Adopting 'waterwise' gardening principles
 - Minimising use of potable water in landscaped areas
 - Properly designed and implemented irrigation systems
 - Establishment of perennial species and deep-rooted trees.
- Surface water, stormwater and drainage
 - Disturbance of natural drainage patterns should be reduced. Where these are disturbed or altered appropriate artificial drainage should be installed
 - Stormwater and surface water should be managed to restrict infiltration
 - Temporary water retaining structures used during construction should be managed to restrict infiltration
 - Stormwater and surface water infrastructure should be designed and constructed to minimise the likelihood of leakage
 - Guttering and down pipes should be connected and maintained
 - Surface water runoff should be directed around all exposed surfaces, temporary stockpiles and landscaped areas.
- Durability of concrete structures in contact with the ground
 - The design of structural concrete members in contact with the ground (excluding piles) adopt an "A2" exposure classification as defined in AS3600:2018.
 - The design of concrete cast in situ piles adopt a "mild" classification as defined in AS2159:2009.

6.1.9. Stormwater and Wastewater

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

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

6.1.9.1. Existing Environment

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

6.1.9.2. Potential Impacts

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

Table 11 WCM Targets

Element	Target
Water Quantity	Minimise flooding from increased stormwater runoff due to development Water Quantity and Management to be provided as directed by Sydney Water, the waterway manager.
Water Quality	Load-based pollution reduction targets based on an untreated urbanised catchment: Gross Pollutants 90% Total Suspended Solids 85% Total Phosphorus 65% Total Nitrogen 45% Total Hydrocarbons 90%
Flooding	Buildings set above the 1% AEP.
Water Supply	Reduce Demand on non-potable water uses.

A summary of how each of the WCM objectives will be achieved is provided below:

- **Stormwater Quantity Management:** Attenuation of stormwater runoff from the development is not required as the site is currently fully developed, existing drainage systems available for discharge based on the fully developed site and the site drains to the Alexandra Canal which is a tidal waterway which is not influenced by urban drainage runoff. Sydney Water, the waterway manager, has confirmed that on-site detention is not required for this development.
- **Stormwater Quality Management:** Model for Urban Stormwater Improvement Conceptualisation (MUSIC) modelling has been completed to confirm the reduction objectives can be met for the development. SQIDs have been implemented to meet these objectives, outlined in **Section 6.1.8.3**.
- **Flood Management:** The site is shown to be clear of any significant local overland flow paths for events up to the 1% AEP event. Consideration to flood requirements has been made per Council Flood Management Policy, as follows:
 - All buildings are sited 500mm above the 1% AEP design flood level of local flow paths.
 - Overland flow paths to manage runoff in large storm events have been made including achieving at least 500mm freeboard to building levels from the flow paths, noting that a greater level of flood immunity is provided to the building than that required by planning to ensure an appropriate level of risk to the building for the intended use. The undercroft carpark is noted to be higher than the 1% AEP as required of City of Sydney Policy.
- **Water Demand Reduction / Rainwater Reuse:** Rainwater reuse measures will be provided as part of this development design. Rainwater harvesting will be implemented to reduce demand on non-potable uses subject to Greenstar requirements. 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 is proposed based on Landcom Blue Book and Council requirements. The management measures take a staged approach from initial site establishment, construction stages and the completion of the development site.

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

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

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

The drainage system proposed as part of the proposed development can be described as:

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

Construction Soil and Water Management

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

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

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

6.1.9.3. Mitigation Measures

Construction Measures

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

Sediment Basins

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

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

Sediment Fences

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

Stabilised Site Access

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

Operational Measures

Operational measures for stormwater and wastewater management are primarily achieved through stormwater harvesting and the following measure:

Rainwater Tank Sizing

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

Rainwater tanks have been designed, using MUSIC software to balance the supply and demand, based on the calculated base water demands and proposed roof catchment areas. Allowances in the MUSIC model have been made for high flow bypass which will be managed by 300mm downpipe roofwater collection configuration along a portion of the south-west of the warehouse.

The MUSIC model predicts that the reuse demands of 50-70% will be met for the development with the provision of a minimum 40 kL rainwater tank.

6.1.10. Hazards and Risks

A Hazard Analysis Report has been prepared by Riskcon Engineering and is attached at **Appendix Y**.

The report has been prepared to assess the risk profile of the development on surrounding land uses to consider if it is acceptable for the context.

6.1.10.1. Potential Impacts

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

The tenants for the units at this point are unknown; however, dedicated dangerous goods (DG) storage is not anticipated to be required, nor is it sought for the facility. It is proposed to provide a level of DG storage to facilitate the operations of tenants which may include the requirement for forklift cylinders, paints, etc.

The maximum quantities of products and DGs that are to be stored at the facility are shown in **Figure 30**.

Figure 30 DG Classes or Materials Stored and Maximum Quantities

Description	Class	PG	Total Quantity (L)	Class Subject to SEPP (Y/N)
Forklift cylinders	2.1	n/a	5,400 kg	Y
Aerosols	2.1	n/a	1,500 kg	Y
Flammable liquids	3	II & III	7,500 L	Y
Batteries	8	III	3,000 kg	Y

Source: Riskcon Engineering

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

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

6.1.10.2. Mitigation Measures

Notwithstanding the above, the following recommendations have been made:

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

6.1.11. Contamination and Remediation

Relevant contamination and remediation documentation prepared and reviewed for this SSDA to address item 16 of the SEARs includes the following:

- Phase 1 and 2 Environmental Site Investigation (**ESA**) prepared by AECOM (dated 5 March 2020) (**Appendix Z**);
- Currency Review of AECOM (2020) Phase 1 and 2 ESA prepared by AECOM (dated 8 July 2022) (**Appendix Z**);
- Remedial Action Plan (**RAP**) prepared by AECOM (dated 15 April 2020) (**Appendix AA**); and
- Site Audit Report and Site Audit Statement (Interim Advice) prepared by Ramboll (dated 29 August 2022) (**Appendix BB**).

6.1.11.1. Existing Environment

The Phase 1 and 2 (**P1 and P2**) Environmental Site Assessments (**ESA**) undertaken by AECOM revealed that the site has historically been used for general industrial activities since pre-1915. Some of these activities included storage and use of petrol, solvents, gases and other chemicals in underground storage tanks (USTs), above ground storage tanks (ASTs), bunded areas and flammable goods storage. In the Site Auditor's opinion, the site history provides an adequate indication of past activities to identify potential contaminants of concern and areas of concern.

AECOM identified the following site conditions during their investigations undertaken in 2015 and 2020:

- The site comprised a warehouse industrial estate with ten tenanted units (Unit 1-9 and 9A) in four standalone structures. The site uses at the time typically comprised freight storage and distribution. Five were vacant in 2020.
- The site was mostly sealed with concrete and bitumen hardstand surfaces. Small garden and lawn areas were present along the access driveways.
- A small unpaved area was present between Unit 9 and the north-western site boundary and multiple fragments of asbestos containing material (ACM), slag, glass, ash/coke and metal pieces were observed.
- There were no visible signs of USTs. USTs were decommissioned by removal in 1997 and abandoned in-situ in 1990. No active USTs were identified by AECOM during these investigations.
- A fence compound adjacent to Unit 8 was empty but appeared to formerly contain gas cylinders and/or aboveground storage tanks (ASTs) based on residual steel pipework. Two brick bund areas with concrete bases were present with no storage activities.

The Site Auditor Ramboll noted the following findings during a site visit conducted on 25 August 2022:

- Units 1-9A were present and were constructed of brick with metal roofs. Units 2, 3 and 9 were used for the storage of cars. Units 1 and 9A appeared to be office buildings. The internal areas of Units 1, 4-8 and 9A were not inspected.
- The eaves of Unit 1 were damaged and potential fragments of ACM were observed on the ground surface adjacent to the building.
- There was no evidence of USTs. An LPG AST was present to the east of Unit 8. Four metal pipes labelled butane, pentane and propane originated adjacent to the LPG AST and entered Unit 9.
- Fragments of potential ACM were observed on the ground surface between Unit 9 and the north-western site boundary.
- Numerous metal plates labelled 'confined space' were identified in driveways and car parking areas.

The P1 and P2 ESA outlined no significant changes in site operations between 2015 and 2020. As such, the data integrity was not deemed to be compromised. AECOM undertook a review of the P1 and P2 ESA and completed an additional site investigation, concluding that these are still relevant and quantify the soil and groundwater contamination at the site.

6.1.11.2. Potential Impacts

The P1 and P2 ESA and the Site Auditor identified contaminants of concern and potential contaminating activities within and surrounding the site. These are summarised in the table below.

Table 12 Contaminants of concern

Area	Activity	Potential Contaminants
Across the site	Fill material	Metals, benzene, toluene, ethylbenzene, xylenes and naphthalene (BTEXN), total recoverable hydrocarbons (TRH), polycyclic aromatic hydrocarbons (PAHs), phenols, OCP, organophosphorus pesticides (OPP), PCB and asbestos
USTs, ASTs, manufacturing areas, workshops	Former site use	Metals, BTEXN, TRH, PAHs, phenols, PCBs, asbestos and volatile organic compounds (VOCs), asbestos contaminated materials (ACM), PFAS.
Beneath building slabs	Pest control	Metals, OCP and OPP
Offsite to the north	Landfill	Landfill gas, including hydrogen sulphide, methane, carbon dioxide, carbon monoxide and oxygen. Potential for groundwater contamination by metals, inorganics and organic contaminants.

The Site Auditor reviewed the conceptual site model (**CSM**) presented in the P1 and P2 ESA following AECOM's assessment of the site. The CSM represented the contaminant source, pathway and receptor linkages at the site. The Auditor considered the CSM to provide reasonable representation of the contamination at the site and an adequate basis for assessing remedial requirements.

The RAP establishes the preferred remediation approach for the site involving capping contaminated material and containment with hardstand and validated soil. Following completion of the proposed bulk earthworks involving cut (18,600m³ to RL 2-2.3m) and fill (41,600m³ to RL 5m), the site will be capped with imported material to achieve the proposed design levels for the undercroft area and remainder of the development. The capping layer (imported material or concrete hardstand) will require a minimum thickness of 0.5m with a marker layer of geofabric and plastic mesh over the fill.

The RAP prepared by AECOM (2020) concluded that provided the RAP is followed and validated, the site will be suitable for commercial / industrial land use if operated in accordance with a future Long Term Environmental Management Plan (**LTEMP**).

The Auditor also undertook an assessment of the AECOM RAP (2020) and identified the following data gaps as requiring assessment prior to remediation of the site:

- Assessment of the leachability of contaminants from fill material is required to demonstrate that it is suitable to be retained onsite underneath a capping layer.
- Further assessment of landfill gas is required in accordance with NSW EPA (2020) *Assessment and management of hazardous ground gases*.

Overall, the Auditor determined that the proposed remediation works are appropriate and that if implemented, the RAP will ensure that the site is suitable for the proposed land uses through the capping

and containment of fill material. This is subject to further assessment for leachability of fill and landfill gas, as well as the recommended mitigation measures outlined in the section below.

6.1.11.3. Mitigation Measures

The Auditor provided the following mitigation measures for the proposal to supplement the implementation of the AECOM RAP (2020):

- Prior to demolition, further investigation of the site is required to address data gaps, including the potential for landfill gas to migrate onto the site from the neighbouring former landfill and the leachability of contaminants from fill material to groundwater.
 - Urbis understands that these further investigations will be carried out prior to determination of the SSDA to determine whether an updated or addendum RAP is required.
- Preparation of a revised RAP or an addendum to the RAP should the data gap investigation require a change to the remedial strategy, prior to commencement of any works.
- Preparation of an AMP and SWMP as part of a CEMP. The documents should be provided to the Auditor for review.
- Consideration of comments made in Table 12.1 of the Site Audit Report (refer **Appendix BB**) during implementation of the RAP, including in relation to depth of capping in deep soil zones and validation of potential USTs.
- Preparation of a validation report demonstrating competent and successful implementation of the RAP.
- Preparation of an EMP with appropriate public notification and legal enforceability and integration into the site management system. It is recommended that implementation of the EMP during site occupation is made a condition of development consent.
- Preparation of a Section A2 Site Audit Statement and Site Audit Report at the completion of remediation and validation of the site.

6.1.12. Waste Management

A Waste Management Plan (**WMP**) has been prepared by SLR Consulting at **Appendix CC**. The WMP calculates waste quantities, assesses onsite waste storage capacity, and outlines safe and sustainable waste handling and disposal methods during demolition, construction, and operational phases of the proposed development.

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

6.1.12.1. Demolition and Construction Waste Management

From the three existing warehouse buildings and hardstand areas, including car parking area, the waste described in **Table 13** will be generated.

Table 13 Estimated types and quantities of construction waste

Rate Type	Area (m ²)	Waste types and quantities (m ³)						
		Timber	Concrete	Bricks	Gyprock	Sand or Soil	Metal	Other
Factory	46,900	117	985	774	211	2,251	281	235
Hardstand, carparking and ramps	34,412	0	723	0	0	1,652	206	172
Office Building	5,020	13	105	83	23	241	30	25

Rate Type	Area (m ²)	Waste types and quantities (m ³)						
		Timber	Concrete	Bricks	Gyprock	Sand or Soil	Metal	Other
Total	86,332	130	1,813	857	234	4,144	518	432

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

- Using prefabricated components.
- Using low formaldehyde wood products, post-consumer reused timber and/or Forest Stewardship Council certified timber.
- Using fittings and furnishings that have been recycled, are made from or incorporate recycled materials and have been certified as sustainable or environmentally friendly by a recognised third-party certification scheme.
- Preferentially using building materials, fittings and furnishings, including structural framing, roofing and façade cladding, that have longer life and better re-use and recycling potential.
- Reducing the use of polyvinyl chloride products.
- Preferentially using paints, floor coverings and adhesives with low VOC (volatile organic compound) content.
- Avoiding unsustainable timber imports including western red cedar, oregon, meranti, luan or merbau.
- Selecting materials based on low embodied energy properties that suit the Project, such as recycled materials including recycled steel and glass-wool insulation, or concrete with slag and fly ash content.
- Centralising wet areas together to minimise piping.
- Designing for deconstruction rather than demolition.
- Applying practical building designs and construction techniques.
- Minimising excavation works.
- Investigating leased equipment and machinery rather than purchase and disposal.
- Sorting and segregating site preparation and construction wastes to ensure efficient recycling of wastes.
- Preferentially selecting building materials, fittings and furnishings, including structural framing, roofing and façade cladding, that have longer life and better re-use and recycling potential.
- Store wastes on-site appropriately to prevent cross-contamination and/or mixing of different waste types.
- Reducing packaging waste by:
 - Returning packaging to suppliers where practicable to reduce waste further along the supply chain
 - Purchasing in bulk
 - Requesting cardboard or metal drums rather than plastics
 - Requesting metal straps rather than shrink wrap, and
 - Using returnable packaging such as pallets and reels.
- Arranging deliveries 'as needed' to mitigate degradation, weathering or moisture damage.
- Ensure subcontractors are informed of and implement site waste minimisation and management procedures.

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

Waste materials subsequently produced from demolitions and construction activities will be separated at the source and stored in skip bins and appropriately managed stockpiles. The waste types are anticipated as follows:

- Bricks, concrete and scrap metal
- Metal and steel, in a condition suitable for recycling at metal recycling facilities
- Timber
- Glass
- Hardstand rubble
- Uncontaminated excavation spoil, if present
- Contaminated excavation spoil, if present
- Hazardous waste, if present
- Paper and cardboard
- General co-mingled recycling waste, and
- Non-recyclable general waste.

A detailed construction waste management plan will be prepared during construction.

Waste Storage Areas & Removal

Waste storage areas will be accessible and allow sufficient space for storage and servicing requirements. The storage areas will also be flexible in order to cater for change of use throughout the project. Where space is restricted, dedicated stockpile areas will be delineated on the site, with regular transfers to dedicated skip bins for sorting.

All waste placed in skips or bins for disposal or recycling will be adequately contained to ensure that waste does not fall, blow, wash or otherwise escape from the site. Waste containers and storage areas will be kept clean and in a good state of repair.

Applicable weather protection measures should be considered for storage spaces.

The frequency of the waste removal will, in most cases, be dictated by the quantities of material being deposited into each of the dedicated skip bins. All skips leaving the site will be covered with a suitable tarpaulin to ensure that the spillage of waste from the skips while in transit is eliminated.

Hazardous Material Survey

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

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

- Asbestos Containing Materials
 - Engage a licenced asbestos contractor to repair and/or encapsulate damaged surfaces (e.g. Various locations - Eaves, Unit 3 & Unit 4 – Telecommunications pit) with a suitable asbestos sealant as soon as practicable. Once sealed maintain in good condition and incorporate into a HMMP. Remove by licenced asbestos removal contractor if item is to be impacted by refurbishment or demolition.
 - Maintain in good condition and incorporate into a HMMP. Remove by a licenced asbestos removal contractor prior to refurbishment or demolition.
- Lead Containing Paint and Dust

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

6.1.12.2. Operational Waste Management

Table 14 and **Table 15** describe the anticipated waste quantities for the operational components of the proposed development.

Table 14 Estimated Warehouse Operational Waste Quantities

Level	Warehouse Number	Total GFA (m ²)	Waste Generation (L per 100m ² per day)		Quantities per day (L)		Days per week	Quantities per week (L)	
			Garbage	Recycling	Garbage	Recycling		Garbage	Recycling
Ground	0-01	2,590	10	10	259	259	7	1,813	1,813
Ground	0-02	2,275	10	10	228	228	7	1,593	1,593
Ground	0-03	2,023	10	10	202	202	7	1,416	1,416
Ground	0-04	1,574	10	10	157	157	7	1,102	1,102
Ground	0-05	880	10	10	88	88	7	616	616
Ground	0-06	827	10	10	83	83	7	579	579
Ground	0-07	806	10	10	81	81	7	564	564
Ground	0-08	827	10	10	83	83	7	579	579
Ground	0-09	1,231	10	10	123	123	7	862	862
Ground	0-10	1,440	10	10	144	144	7	1,008	1,008
Level 1	1-01	2,567	10	10	257	257	7	1,797	1,797
Level 1	1-02	2,278	10	10	228	228	7	1,595	1,595
Level 1	1-03	2,000	10	10	200	200	7	1,400	1,400

Level	Warehouse Number	Total GFA (m²)	Waste Generation (L per 100m² per day)		Quantities per day (L)		Days per week	Quantities per week (L)	
			Garbage	Recycling	Garbage	Recycling		Garbage	Recycling
Level 1	1-04	1,600	10	10	160	160	7	1,120	1,120
Level 1	1-05	863	10	10	86	86	7	604	604
Level 1	1-06	822	10	10	82	82	7	575	575
Level 1	1-07	808	10	10	81	81	7	566	566
Level 1	1-08	817	10	10	82	82	7	572	572
Level 1	1-09	1,222	10	10	122	122	7	855	855
Level 1	1-10	1,440	10	10	144	144	7	1,008	1,008
Level 2	2-01	2,613	10	10	261	261	7	1,829	1,829
Level 2	2-02	2,268	10	10	227	227	7	1,588	1,588
Level 2	2-03	2,000	10	10	200	200	7	1,400	1,400
Level 2	2-04	1,600	10	10	160	160	7	1,120	1,120
Level 2	2-05	837	10	10	84	84	7	586	586
Level 2	2-06	810	10	10	81	81	7	567	567
Level 2	2-07	800	10	10	80	80	7	560	560
Level 2	2-08	810	10	10	81	81	7	567	567
Level 2	2-09	1,230	10	10	123	123	7	861	861
Level 2	2-10	1,460	10	10	146	146	7	1,022	1,022
Total		43,318			4,332	4,332		30,323	30,323

For these designated warehouse waste quantities, 1,100L rear lift bins are a suitable option.

Table 15 Estimate Office Operational Waste Quantities

Level	Total GFA (m²)	Quantities per day (L)				Days per Week	Quantities per week (L)			
		Garbage	Food	Paper and Cardboard	Recyclable Containers		Garbage	Food	Paper and Cardboard	Recyclable Containers
Ground	430	65	22	100	2	7	452	151	700	11
Level 1	1,115	167	56	259	4	7	1,171	390	1,815	27

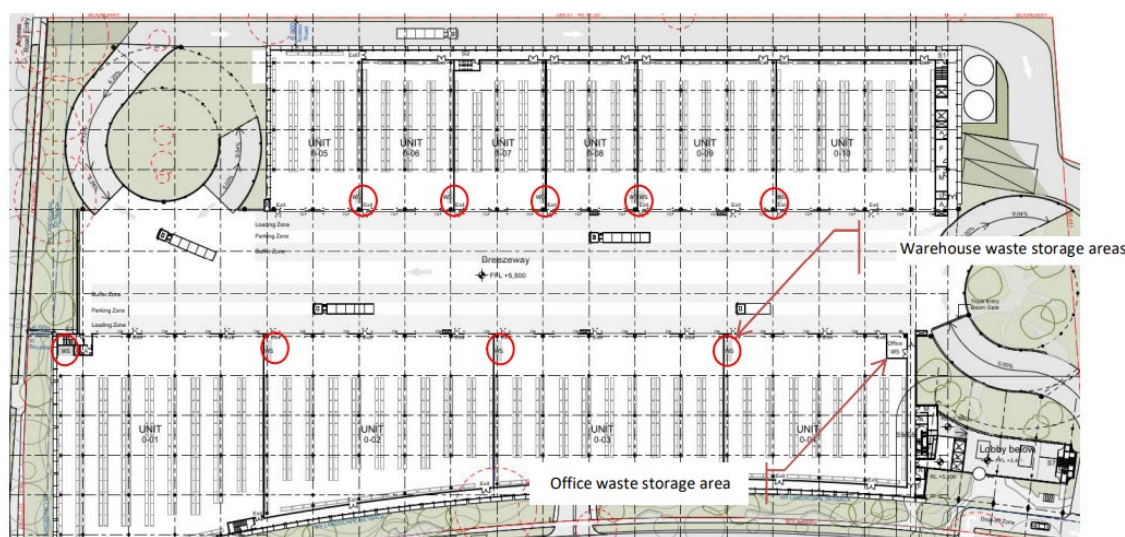
Level	Total GFA (m2)	Quantities per day (L)				Days per Week	Quantities per week (L)			
		Garbage	Food	Paper and Cardboard	Recyclable Containers		Garbage	Food	Paper and Cardboard	Recyclable Containers
Level 2	1,115	167	56	259	4	7	1,171	390	1,815	27
Total	2,660	399	133	618	9		2,793	931	4,329	65

Given the estimated quantities of waste for the office component, 240L bins for garbage, paper and cardboard, and recyclables containers are a suitable option. Food waste is proposed to be collected in 120L bins.

The locations of waste storage areas for both warehouse and office components on a typical proposed floor have been highlighted in Figure 31.

For waste collection, waste collection vehicles will enter the site through the heavy vehicle entrance and drive to each tenancy where the collection contractor operators will bring bins from their storage location to the vehicle for emptying. The waste collection vehicles will then exit the site through the heavy vehicles exit.

Figure 31 Typical Location of Waste Storage Areas



Source: SLR Consulting

6.1.13. Social Impact

A Social Impact Assessment (SIA) has been prepared by Urbis in accordance with the DPE's *Social Impact Assessment Guidelines for State Significant Projects* (2021) to address SEARs item 20 (Refer to **Appendix FF**). The SIA identifies and analyses the potential positive and negative social impacts associated with the proposal by comparing the magnitude of impact (minimal to transformational) against the likelihood of the impact occurring (very unlikely to almost certain). Consultation has been undertaken with the City of Sydney Council, Inner West Council and Bayside Council in the preparation of this SSDA.

6.1.13.1. Existing Environment

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

Key characteristics of both areas and the community include:

- High proportion of young adult population (aged 20-39 years old).
- High proportion of residents that are educate with a bachelor's degree or above.
- High rates of residents living in apartments, semi-detached or terrace houses.
- Both suburbs have low rates of unemployment – St Peters (4%) and Mascot (5%).
- St Peters had a significantly higher weekly median household income of \$2,924. Mascot had a lower weekly median income of \$2,253.
- 43% of Mascot residents travel to and from work by private car, whilst St Peters had a lower proportion of residents at 38%, with the majority using public transport (43%).
- As of July 2022, the site did not fall within any relevant crime hotspots. However, St Peters has higher rates of certain types of crime per 100,000 people than NSW in general. This includes incidents of theft (break & enter non-dwelling and motor vehicle) and malicious damage to property.

6.1.13.2. Potential Impacts

The SIA assesses the expected and perceived impacts considered to have the most significant impacts on the community and identified stakeholder groups. Urbis have assessed and identified social impacts considered to have a neutral to low impact on the community, as well as moderate to high impacts which could be considered to have a significant impact on the community.

The following neutral to low impacts have been identified:

- Health and wellbeing (provision of facilities and services): the inclusion of on-site facilities and services and proximity to food and beverage opportunities is expected to have a low positive impact on future workers and site visitors.
- Health and wellbeing (air quality): based on the findings of the AQIA (**Appendix T**), air quality impacts during the construction and operation of the proposal are expected to have a neutral impact on the health and wellbeing of future workers and the surrounding community.
- Livelihood impacts related to increased employment opportunities: the increase in construction, warehousing and logistics jobs is expected to have a neutral impact.
- Connection to Aboriginal culture and heritage: if the recommendations in the AHCAR and the Visual Design Report (**VDR**) are implemented, the proposal will likely have a low positive impact on Aboriginal groups and communities' connection to culture and heritage.
- Surroundings impacts related to creating a safe urban environment: the integration of CPTED principles in the proposal's design is expected to contribute to a safe urban environment for future workers and visitors accessing the site, as well as the surrounding community. This will likely have a neutral to low positive impact on future workers on site and the surrounding community.

The SIA has also identified moderate to high impacts that could be considered significant. These potential impacts have been assessed further in the table below.

Table 16 Assessment of significant social impacts

Description of Impact	Impacted Groups	Impact of the proposal
The proposal will likely have a negative impact on people near the site through increased noise during construction and operation.	Occupants and workers of existing residential, industrial, and religious premises near the site.	<u>During construction</u> Most noise exceedances will be generated during demolition works when rock breaking equipment is in use. Removal of vegetation will also contribute to the expected noise exceedances. This will likely have a negative impact on residents and occupants of existing premises nearby. However, this will reduce to a neutral impact once construction is complete.

Description of Impact	Impacted Groups	Impact of the proposal
		<u>During operation</u> There may be noise exceedances at night time by heavy vehicles that use air brakes and negatively impact residents west of the site. Noise exceedances during the night can impact people's sleep and have a significant negative impact on their health and wellbeing through physical and cognitive function. The NIA indicates that heavy vehicles with air brakes will not often be in use at the site and therefore reduces the likelihood of the impact. Without mitigation measures in place to reduce the noise exceedances, this noise exceedance will likely have a negative impact on residents in the western area near the site.
Residual Impact Summary (considering mitigation measures – Refer to Appendix C)		
Likelihood: Possible	Magnitude: Moderate	Resultant impact: Medium negative
The proposal will likely increase noise during construction and operation. During construction, there will likely be several occupants of residential, industrial, and religious premises that will be negatively impacted through noise impacts related to way of life and cognitive performance during activities. While at first this will pose a low negative impact, it will reduce to a neutral impact once construction is complete. The proposal will operate 24 hours seven days a week and will produce increased noise exceedances by heavy vehicle truck use at night time. Noise impacts during the night can significantly impact people as sleep is essential to physical and cognitive function. This noise impact will have a medium negative impact on residents in the western area near the site. However, these noise exceedances are unlikely to occur often.		

6.1.13.3. Mitigation Measures

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

- Implement all the recommendations in the Noise Impact Assessment (**NIA**) to reduce noise impacts, focusing on significantly reducing the use of heavy vehicles that use air brakes (Refer **Section 6.1.7** of this EIS).
- In consultation with City of Sydney, Bayside, Inner West Council and the local communities, develop and implement a Communications Strategy to identify clear instructions for noise complaints.

Overall, based on an assessment of all social impacts identified in the SIA, the proposal is expected to have a neutral impact on the community.

6.1.14. Infrastructure Requirements and Utilities

Both a Utilities Review Update (**URU**) prepared by AT&L and Electrical and Communications Assessment (**ECA**) prepared by Edgewater Connections are attached at **Appendix GG**.

These reports provide an assessment of the proposed development on the existing surrounding infrastructure, satisfying item 21 of the SEARs.

6.1.14.1. Existing Environment

The URU and ECA identify the following service authorities as providing site infrastructure:

- Electrical:
 - Ausgrid
 - Transgrid
- Telecommunication:
 - Telstra
 - NBN
 - Optus
- Water, Sewer, Stormwater, and Gas Services
 - Sydney Water
 - Jemena Gas

It is noted that a traffic controller signal is at the Burrows Road and Canal Road intersection.

6.1.14.2. Potential Impacts

Both the URU and ECA confirm that the proposed development will have negligible impact on the existing infrastructure servicing the site, as summarised below. Any required infrastructure will be coordinated with the project team and relevant asset holder to ensure the assets are construction and commissioned prior to Occupation Certificate approval.

Electricity

The maximum demand for the proposed multi-level warehouse development is approximately 3200kVA. This includes allowances for refrigeration and food processing to a portion of the development. Ausgrid have confirmed that capacity is available in their existing 11kV network at the frontage of the site to provide supply to this development and have issued a design offer to install a 3x 1500kVA chamber substation.

The proposed new substation will also need to provide a 400A supply to the street, to maintain the supply currently provided by substation S.1629 when it is decommissioned. A 3x 1500kVA chamber substation has sufficient capacity to supply both the proposed redevelopment and the existing street supply. Power utilisation will prioritise power use generated by the PV supply. As highlighted previously, this will offset power usage during the middle of the day.

Engagement has been undertaken with Ausgrid to inform the chamber design noting there is no specific guideline to chamber design. Ausgrid will define decommission and commissioning requirements with respect to maintaining any current power supply within their future design approval. Power utilisation will prioritise power use generated from Solar. Power utilisation modelling difficult to define noting speculative nature of development.

Communications

The extensive Telstra network within the site servicing the existing building will need to be removed as part of the redevelopment. Specifically, minor works will be required to disconnect and remove the existing services prior to demolition. Communications services will be augmented to connect the new operation to the Telstra network.

Water, Sewer, and Stormwater

The site will receive its potable water supply from the DN150 water main in Canal Road. This main is supplied by a DN500 water main that runs along both Canal Road and Burrows Road. Based on the Statement of available pressure provided by Sydney Water there is sufficient pressure available in the mains to deliver up to 67 litres/second at 36m head as a maximum flow. If the site requires more than the available flow, on site holding tanks will be required.

Gas Services

Jemena Gas assets do not appear to encroach on the site boundary, as such the existing assets are considered to be unaffected by the works. Consultation with Jemena should be undertaken to confirm availability of supply for the proposed development.

Traffic Controller

TfNSW should be consulted and the relevant controller on the intersection of Canals Road and Burrows Road protected during demolition.

6.1.15. Construction, Operation and Staging

Construction of the proposed development will be staged as follows:

- Site preparation, earthworks / piling, and footing (CC1)
- Public Art Plan approval, inground services, and structure (CC2)
- Façade, services, and fit out (CC3)
- Landscaping and external works (CC4)
- SAS conditions, public domain, and public art (CC5)

The tasks required in the second and third phases can be undertaken partly concurrently, providing an overall construction programme of approximately 18 months. Site establishment is anticipated to commence in Q2 2023 (subject to development approval).

It is anticipated that construction will be undertaken during the following hours:

- Monday to Friday: 7.30am – 5.30pm
- Saturday: 7.30am – 3.30pm
- Sunday and Public Holidays: no works to be undertaken

Operation of the site will not begin until all requisite staged construction works has been completed.

All construction will be undertaken in-line with the CTMP provided with the TMAP at **Appendix O** and WMP at **Appendix CC**.

6.2. STANDARD ASSESSMENT IMPACTS

This section of the report addresses the matters which require a standard assessment. It outlines the findings of the assessment and the key mitigation measures used to ensure compliance with the relevant standards or performance measures.

6.2.1. Aboriginal Cultural Heritage

An Aboriginal Cultural Heritage Assessment (**ACHA**) has been undertaken by Artefact Heritage and an Aboriginal Cultural Heritage Assessment Report (**ACHAR**) is attached as **Appendix EE**.

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

- An extensive search of the Aboriginal Heritage Information Management System (**AHIMS**) which did not reveal any sites listed in the study area
- No previously unrecorded Aboriginal sites or objects were identified within the study area during the site inspection
- The study area has been disturbed through the construction of several warehouses and associated infrastructure including truck loading docks and carparks and landscaping and subsurface works
- In-depth background research and assessment following an archaeological survey

- The historical images support a history of disturbance in the study area illustrating that buildings have been erected, parts demolished and rebuilt and subsequently extended since at least 1951
- The detrimental effects to soil integrity due to construction works is further heightened by the high levels of disturbance of the soil profile of the broader area in which the study area sits, which has been classified as “disturbed terrain”.
- The predictive model for the area does not support the likelihood of archaeological sensitivity being present in the study area.
- The site officer of the Metropolitan LALC was in agreement that the study area was highly disturbed.
- As there are no archaeological values in the site, there is no scientific significance.

As such, the ACHAR concludes that no further archaeological investigation is required.

The following recommendations should be implemented during the construction and operational stages of the proposed development:

- Ongoing consultation with registered Aboriginal parties
- Unexpected finds policy
 - Stop work within the affected area, protect the potential archaeological find, and inform environment staff or supervisor
 - Contact a suitably qualified archaeologist to assess the potential archaeological find
 - If Aboriginal archaeological material is identified, works in the area should cease, and NSW Heritage should be informed. Further archaeological mitigation may be required prior to works recommencing
 - If human remains are found:
 - Immediately cease all work at the particular location
 - Notify site manager and project archaeologist
 - Notify NSW Police
 - Notify Heritage NSW on the Environment Line 131555 as soon as practicable and provide details of the remains and their locations
 - Notify the Metropolitan LALC

6.2.2. Environmental Heritage

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

6.2.3. Bushfire Risk

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

6.2.4. Flooding Risk

Assessment of the potential flood risk for the site is included with the Civil Engineering Report at **Appendix X**. The proposed development and an assessment of the site in relation to the flood modelling and documented flood behaviour included in the *Alexandra Canal Catchment Flood Study Model Update – ARR2019 Hydrology* completed by WMA Water and *M5 EIS SSI-6788 Flood Impact Assessment*.

Review of this information shows the site is not subject to flooding or overland flow paths. As the site is not subject to flooding or overland flow, no detailed modelling or flood impact assessments are necessary for the development.

The floor level of the building has been set 0.5m above the gutter level, above the 1% AEP level, to ensure nuisance flooding and gutter flows do not affect the operation of the development when operational. The undercroft will not be inundated in a 1% event.

6.2.5. Biodiversity

To assess the potential biodiversity impact of the proposed development and request requirement of a BDAR be waived, a BDAR Waiver Request was prepared by SLR Consulting. Subsequently, a BDAR Waiver was granted by DPE on 24 October 2022 confirming their satisfaction that the proposed development is not likely to have any significant impact on biodiversity values. The BDAR Waiver is attached at **Appendix S**.

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

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

A number of alternative designs have been considered for the site with a competitive design alternatives process being undertaken for the proposed warehouse and distribution centre in order to achieve design excellence. The final design from Welsh and Major best embodied the vision from the applicant, the jury concurring that the design best exhibited design excellence while maximising the productive space of the site.

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

7.2. STRATEGIC CONTEXT

The proposal is consistent with the State and local strategic planning policies. The site is highly suitable for the proposed development being located within an established industrial precinct, being the Southern Employment Lands. The proposal will deliver additional industrial floorspace in an appropriate land use zone, intended to meet employment growth and demand targets by providing 552 operational jobs.

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

7.3. STATUTORY CONTEXT

The relevant State and local environmental planning instruments are listed in **Section 4** and assessed in **Appendix B**. 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 of the Act and addressed in **Appendix B**.
- 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 granted by DPE.
- This SSDA pathway has been undertaken in accordance with Chapter 2, SEPP Planning Systems as the proposed development is classified as SSD.

- Concurrence from TfNSW will be required as per Chapter 2 of the SEPP Transport and Infrastructure for 'traffic generating development'.
- The proposal complies with all of the relevant provisions under the SLEP 2012 as detailed in **Appendix B**. The proposed development is generally consistent with the objectives of the IN1 zone. A Clause 4.6 variation to development standard has been prepared to address the minor variation to the maximum FSR for the site resulting from the EOTF within the undercroft and office waste room.
- The proposed development has been assessed in accordance with Chapter 3 and 4 of SEPP Resilience and Hazards. The proposed development complies with the relevant clauses of these SEPPs.
- The proposal generally accords with the relevant provisions of the SDCP 2012 as outlined in **Appendix B**.

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 ESD in accordance with the requirements of the EP&A Regulation and as outlined below:
 - Precautionary principle: the precautionary principle relates to uncertainty around potential environmental impacts and where a threat of serious or irreversible environmental damage exists, lack of scientific certainty should not be a reason for preventing measures to prevent environmental degradation. The development as proposed will not result in any threat of serious environmental damage or degradation. Rather, from the current state of the site, the landscaping and design proposed will result in a superior environmental outcome for the site.
 - Intergenerational equity: the needs of future generations are considered in decision making and that environmental values are maintained or improved for the benefit of future generations. The development represents a sustainable development, making best use of a brownfield site in a widely accessible location. The development will not have any acceptable impacts on the environment.
 - Conservation of biological diversity and ecological integrity: the proposal will not have any unacceptable impacts on the conservation of biological diversity and ecological integrity. The proposal includes landscaped setbacks and roof-top 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 ESD Report (**Appendix R**) identifies a number of different ecological sustainability initiatives including energy savings, energy efficiency and waste minimisation.

- **Built Environment:** the proposal has been assessed in relation to the following built environment impacts:
 - Built Form: The proposed built form sits comfortably in its context on the edge of the Southern Employment Lands, in close proximity to the St Peters Interchange and Princes Highway amongst other built forms of similar types. The proposal has a larger built form that demonstrates design excellence and is articulated by the massing and façade design, combined with the landscape

strategy and public art strategy. All these work to soften the built form impact and integrates a best-in-case warehouse building into the fabric of the area (as discussed in **Section 6.1.1**). The proposed has a compliant height of building, utilising the design excellence 10% height bonus, with a technical FSR non-compliance. This non-compliance has been suitably justified in the accompanying Clause 4.6 variation request at **Appendix II**.

- **Visual Impacts:** the proposal will not result in any adverse visual impacts and the extent of the visual effects generated is acceptable in the immediate and wider visual context, as highlighted in **Section 6.1.2**.
 - **Traffic Impacts:** As discussed in **Section 6.1.3**, the proposal will not result in any significant traffic impacts and is considered suitable from a traffic generation perspective given the surrounding intersections will continue to operate at an acceptable level. No additional upgrades to the surrounding road network are required.
 - **Trees and Landscaping:** as set out in **Section 6.1.4**, the Landscape Plans / Design Statement and the AIA, the proposal includes a high level of indigenous species planting and large canopy landscaping across the site. The proposed tree removal is mitigated by the proposed offset planting of over 100 trees and the robust landscape response including
 - **Noise Impact:** As outlined in **Section 6.1.7**, the construction and operational noise associated with the proposed development is generally below the relevant noise criteria. The one exceedance caused by truck air-breaking can be mitigated by the recommended design interventions. Overall, the proposal has been assessed as appropriate from an acoustic perspective.
- **Social:** the proposal is assessed to have an overall neutral impact on the surrounding community.
 - **Economic:** The proposal is assessed to have a positive economic impact through the delivery of employment-generating industrial and commercial floor space on the site which will result in investment and economic benefit for Sydney as well as the wider region.

The potential impacts can be mitigated, minimised or managed through the measures discussed in detail within **Section 6** and as summarised in **Appendix C** 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 is permitted in the IN1 zone and is consistent with the relevant zone objectives, providing a wide range of industrial and warehouse land uses and delivering employment opportunities, while minimising adverse effects on other land uses.
- The development satisfactorily addresses the relevant provisions in SLEP 2012 and SDCP 2012, including acoustic amenity, built form and setbacks, car parking and landscaping. The minor variation to the 1.5:1 FSR control has been justified by way of a Clause 4.6 variation.
- The site is located within an existing industrial area and the character and scale of the development is compatible and consistent with its context, avoiding unacceptable impacts on residential amenity.
- The site is highly accessible to both the transport and regional freight network and the rail network and makes use of a brownfield site to deliver sustainable development.

7.7. PUBLIC INTEREST

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

- The proposal is consistent with relevant State and local strategic plans and satisfactorily addresses the relevant State and local planning controls.
- No adverse environmental, social, or economic impacts will result from the proposal.
- The proposal will provide 670 jobs during the construction phase and 552 jobs once fully operational.
- The proposal will stimulate local investment and contribute significant economic output and value add to the economy each year.

- The project is fully funded and 'shovel ready' for commencement of construction as soon as possible 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.

DISCLAIMER

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

APPENDIX A

SEARS REFERENCE TABLE

APPENDIX B

STATUTORY COMPLIANCE TABLE

APPENDIX C

MITIGATION MEASURES

APPENDIX D

ENGAGEMENT SUMMARY

APPENDIX E

QS COST ESTIMATE REPORT

APPENDIX F

SURVEY PLAN

APPENDIX G

ARCHITECTURAL DRAWINGS

APPENDIX H

DESIGN REPORT

APPENDIX I

DESIGN EXCELLENCE STRATEGY

APPENDIX J

COMPETITION REPORT

APPENDIX K

DESIGN INTEGRITY PANEL ENDORSEMENT

APPENDIX L

BCA COMPLIANCE REPORT

APPENDIX M

FIRE SAFETY STRATEGY

APPENDIX N

VISUAL IMPACT ASSESSMENT

APPENDIX O

TRANSPORT, TRAFFIC AND ACCESSIBILITY ASSESSMENT

APPENDIX P

LANDSCAPE PLANS

APPENDIX Q

ARBORICULTURE IMPACT ASSESSMENT

APPENDIX R

ESD REPORT

APPENDIX S

BDAR WAIVER

APPENDIX T

AIR QUALITY IMPACT ASSESSMENT

APPENDIX U

NOISE AND VIBRATION IMPACT ASSESSMENT

APPENDIX V

GEOTECHNICAL INVESTIGATION

APPENDIX W

SOIL SALINITY INVESTIGATION & MANAGEMENT PLAN

APPENDIX X

CIVIL ENGINEERING REPORT

APPENDIX Y

HAZARD ANALYSIS

APPENDIX Z

PHASE 1 AND 2 ENVIRONMENTAL SITE INVESTIGATION

APPENDIX AA

REMEDIATION ACTION PLAN

APPENDIX BB

SITE AUDIT REPORT (INTERIM ADVICE)

APPENDIX CC

WASTE MANAGEMENT PLAN

APPENDIX DD

HAZARDOUS MATERIALS SURVEY

APPENDIX EE

ABORIGINAL CULTURAL HERITAGE ASSESSMENT REPORT

APPENDIX FF

SOCIAL IMPACT ASSESSMENT

APPENDIX GG

UTILITIES AND INFRASTRUCTURE ASSESSMENT

APPENDIX HH

ENGAGEMENT OUTCOMES REPORT

APPENDIX II

CLAUSE 4.6 VARIATION REQUEST

