

# 5 & 9 CULVERSTON ROAD, MINTO

Modification Report

Prepared for  
**CHARTER HALL**  
29 October 2021



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# EXECUTIVE SUMMARY

This Modification Report has been prepared on behalf of Charter Hall in support of an application to amend SSD-7500 for warehouse and distribution uses at 5 and 9 Culverston Road, Minto.

On 23 June 2017, a State significant development ('SSD') Application was approved by the Minister for Planning under delegation for construction, fit-out and operation of a warehouse and logistics hub with 112,000m<sup>2</sup> of gross floor area ('GFA') including four warehouse buildings for warehousing and distribution uses, with ancillary offices.

The construction of the warehouses is proposed to be delivered in stages, with ancillary car parking to be delivered with each stage. The development consent has been implemented through the completion of initial ground works and remediation.

Since purchasing the site, Charter Hall has undertaken market research and discussions with prospective tenants. As a result of this process, potential tenants have been identified for Warehouses 1B and 1C who require less internal warehouse GFA and additional outdoor storage area.

Accordingly, it is proposed to modify the original development approval to achieve the following project objectives:

- Meet market demand and achieve viable economic return
- Ensure minimal environmental and amenity impact
- Provide for employment generating land uses
- Ensure development is compatible with surrounding development and the local context.

This Modification Application seeks consent for changes to the plans and conditions associated with SSD-7500. The modification aims to meet the identified market demand, amending the design to achieve a viable economic return and occupation and operation of the approved warehouse and distribution use on site.

## Strategic Context

The proposal has also been assessed in accordance with the key planning objectives, priorities and actions outlined within relevant strategic planning policies including:

- *Premier's Priorities*
- *Greater Sydney Region Plan: A Metropolis of Three Cities*
- *Our Greater Sydney 2056: Western City District Plan*
- *Campbelltown Local Strategic Planning Statement.*

## Proposed Modifications

The proposed modifications are summarised as follows:

- Modified staging to deliver the development in four stages in a revised order.
- Reduction in warehouse GFA, reduction in office GFA and increased external storage area for Warehouse 1B.
- Reduction in warehouse GFA, reduction in office GFA and increased external storage area for Warehouse 1C.
- Increase in warehouse GFA for Warehouse 1D to reflect revised boundary line between Warehouse 1D and Warehouse 1C.
- Revised car parking provision for Warehouses 1B, 1C and 1D to reflect amended GFA and tenant requirements.
- Reduction in total GFA from 112,000m<sup>2</sup> to 93,378m<sup>2</sup>.

- Increase in outdoor storage area from 6.9 hectares to 8.8 hectares.

## Statutory Context

This report considers the relevant regulatory framework applicable to the site and the proposal and contains an assessment of the proposal against the following statutory controls and regulatory instruments, including:

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2000*
- *State Environmental Planning Policy (State and Regional Development) 2011*
- *State Environmental Planning Policy (Infrastructure) 2007*
- *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development*
- *State Environmental Planning Policy No. 55 – Remediation of Land*
- *State Environmental Planning Policy No. 64 – Advertising & Signage.*

## Engagement

Stakeholder engagement has been undertaken by Charter Hall during the preparation of this report. This includes direct engagement and consultation with:

- Department of Planning, Industry and Environment
- Campbelltown City Council.

The outcomes of the stakeholder engagement have been incorporated into the proposed design of the modification and proposed amendments to conditions of consent.

## Assessment of Impacts

The Modification Report assesses the modified proposal in relation to the key issues and relevant planning instruments and policies, considering the likely environmental impacts of the proposal, including:

- **Traffic and Parking:** the proposed modification is acceptable on traffic and transport planning grounds with no adverse impacts to the external road network.
- **Urban Design and Visual Impacts:** the level of visual effects and potential visual impacts associated with the proposed modification would be negligible and of minimal environmental impact.
- **Noise and Vibration:** the proposed modification will result in maximum noise levels at surrounding receivers which will be acoustically acceptable.
- **Flooding and Stormwater:** there are no changes to the approved flood impacts or flood behaviour at the site due to the proposed modification.
- **Contamination:** the contamination impacts and remediation measures remain as approved.

Each of the recommended updates to the original mitigation measures has been reviewed in detail and can be incorporated as conditions of consent and implemented during the demolition, construction and operational phases of the development.

## Evaluation of the Modified Project

This Modification Report has assessed the environmental, social and economic impacts of warehouse and distribution centre at 5 and 9 Culverston Road.

Having regard for the biophysical, economic and social considerations, including the principles of ecologically sustainable development, the proposed development is justified for the following reasons:

- The development as modified accords with the applicable statutory requirements and is entirely consistent with the strategic planning policy objectives. The proposal will deliver modern warehousing

and distribution uses within an allocated industrial area, that is strategically located to the regional road and freight network.

- The assessment concludes the modified proposal will result in minimal environmental and amenity impacts during construction and operation of the development, subject to the implementation of the proposed mitigation measures and SSD conditions of consent.
- The site is highly suitable for industrial use being designated IN1 General Industrial, highly accessible to the transport network, compatible with the surround development and local context of existing industrial uses, whilst having minimal impact on the environment.
- Engagement with stakeholders informed the development and design of the project, including proposed mitigation measures.
- On balance, the impacts and benefits of the proposal favour the public interest.

Having considered all relevant matters, we conclude the development as proposed to be modified is appropriate for the site and approval is recommended.

# 1. INTRODUCTION

This report is submitted to the Department of Planning, Industry and Environment ('DPIE') on behalf of Charter Hall to modify the original State Significant Development ('SSD') Application SSD-7500 at 5 and 9 Culverston Road, Minto.

## 1.1. APPLICANT DETAILS

The proponent details are listed in the following table.

Table 1 Proponent Details

Descriptor	Proponent Details
Full Name(s)	Charter Hall Holdings Pty Ltd c/- Urbis
Postal Address	Level 8, 123 Pitt Street Sydney
ABN	50 105 256 228
Nominated Contact	Holly Rhoades, Senior Consultant

## 1.2. APPROVED PROJECT

On 23 June 2017, a SSD Application was approved by the Minister for Planning under delegation in relation to *Construction, fit-out and operation of a warehouse and logistics hub with 112,000 m<sup>2</sup> of gross floor area (GFA) including:*

- *Four warehouse buildings for warehousing and distribution uses, with ancillary offices, comprised of:*
  - *Warehouse 1A: 40,000 m<sup>2</sup> of warehousing GFA and 2,000 m<sup>2</sup> of office GFA*
  - *Warehouse 1B: 22,000 m<sup>2</sup> of warehousing GFA and 1,000 m<sup>2</sup> of office GFA*
  - *Warehouse 1C: 22,000 m<sup>2</sup> of warehousing GFA and 1,000 m<sup>2</sup> of office GFA*
  - *Warehouse 1D: 23,000 m<sup>2</sup> of warehousing GFA and 1,000 m<sup>2</sup> of office GFA.*
- *6.9 hectares of external hardstand storage space for warehousing and logistics uses;*
- *Bulk earthworks;*
- *Demolition of existing structures and hardstand areas;*
- *Remediation works;*
- *Upgrades to existing on-site infrastructure;*
- *Loading docks;*
- *Car parking;*
- *Site landscaping; and*
- *Estate and building identification signage.*

The site location is shown in **Figure 1**. The regional context is shown in **Figure 2**.

The construction of the warehouses is proposed to be delivered in stages, with ancillary car parking to be delivered with each stage (refer **Figure 3**). Additional provisional parking areas are provided should these be required through the operation of the uses on site. The warehouses and storage area are accessed via Culverston Road. The approved warehouses on site have a maximum height of 13.7 metres. Setbacks and landscaping are provided to the site boundaries.

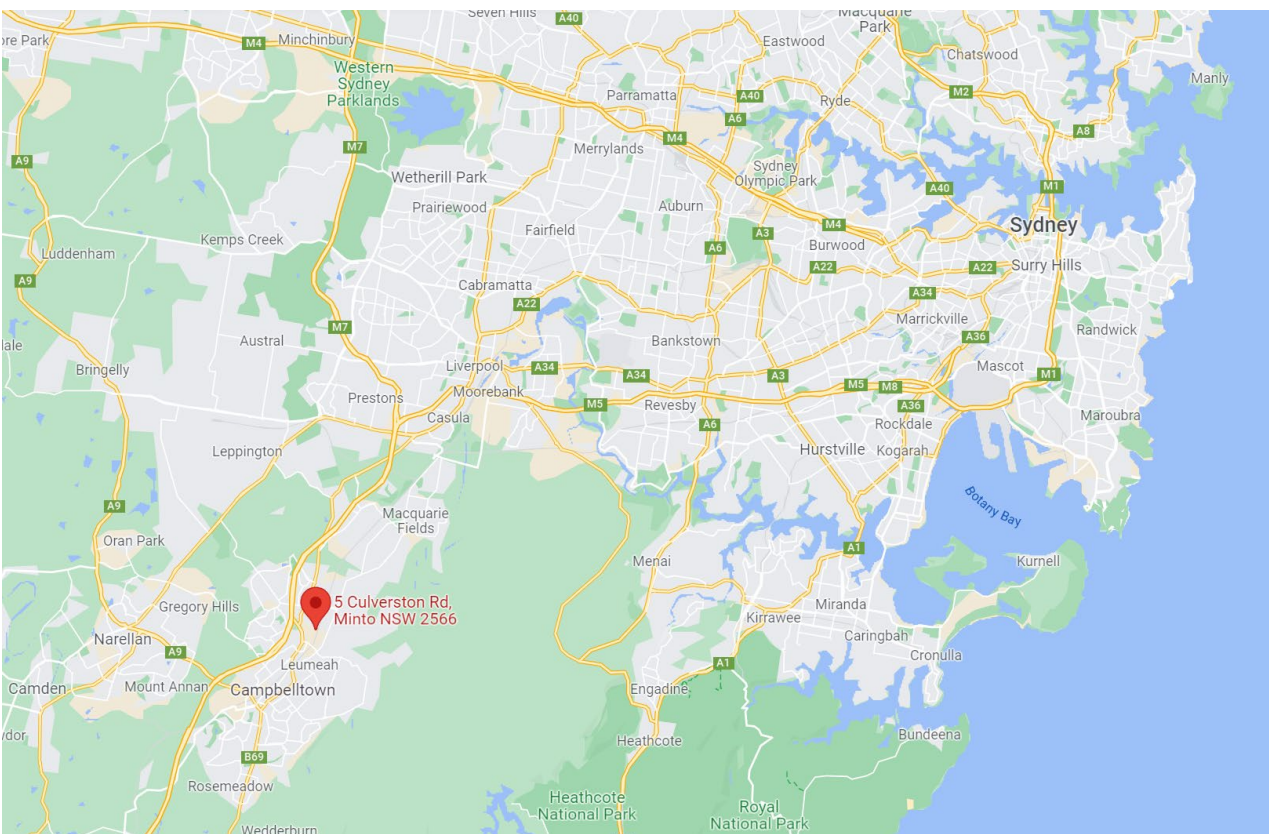
The development consent has been implemented through the completion of initial ground works and remediation.

Figure 1 Aerial view of site



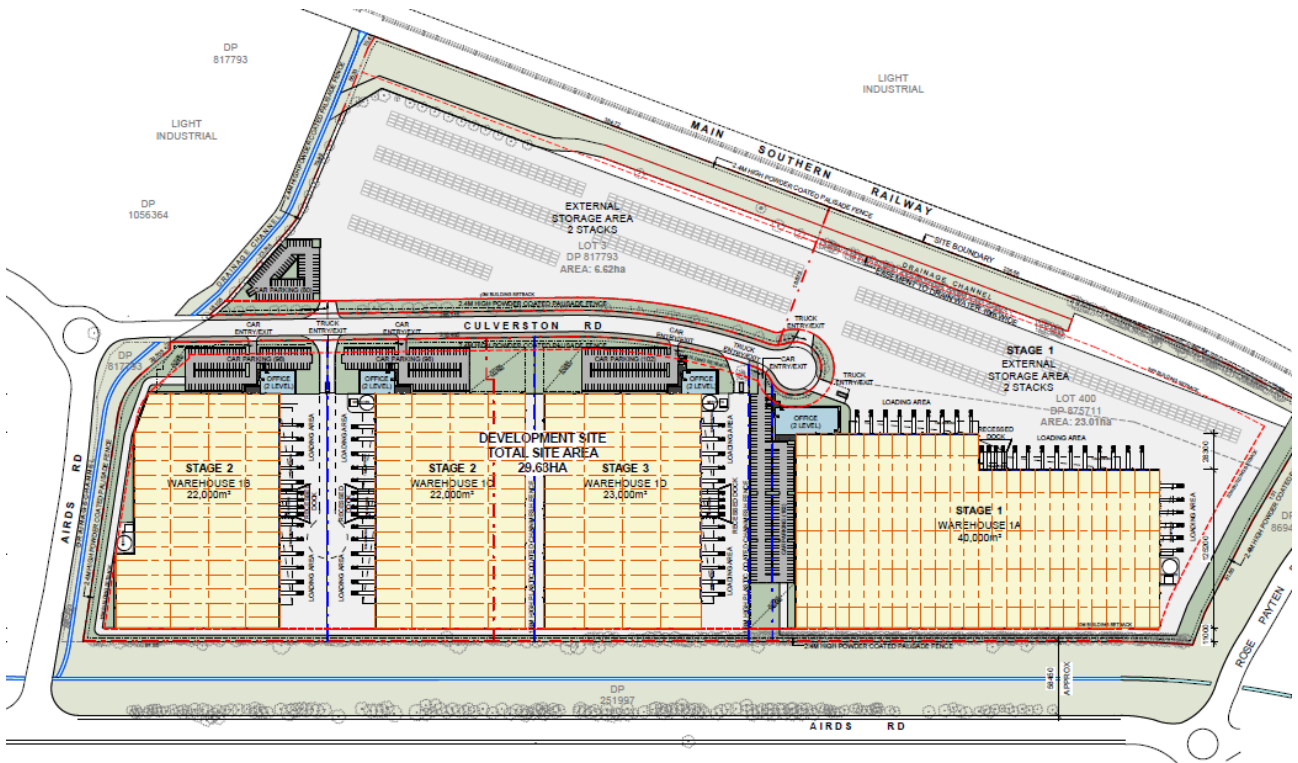
Source: Urbis

Figure 2 Regional context



Source: Google Maps 2021

Figure 3 Approved site plan SSD-7500



Source: Reid Campbell

### 1.3. PROPOSED MODIFICATIONS

The Modification Application seeks changes to the plans and conditions associated with SSD-7500. Charter Hall have recently purchased the site and progressed discussions with prospective tenants. Amendments are sought to Warehouses 1B, 1C and 1D and the staging of the development, to reflect tenant requirements and allow Charter Hall to deliver the site to meet market demand.

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

Table 2 Project Objectives

Project Objective	Proposed Modification
Meet market demand and achieve viable economic return	Since purchasing the site, Charter Hall has undertaken market research and discussions with prospective tenants. As a result of this process, prospective tenants have been secured for Warehouses 1B and 1C. These tenants require less internal warehouse GFA and additional outdoor storage area. The modification aims to meet this market demand, amending the design to achieve a viable economic return and occupation and operation of the approved warehouse and distribution use on site.
Ensure minimal environmental and amenity impact	The proposed modification has been designed to ensure minimal environmental and amenity impact. Mitigation measures proposed accord with the approved development consent.
Provide for employment generating land uses	The site will continue to provide for employment generating land uses. The proposed modification will enable the delivery of employment opportunities on site.

<p><b>Project Objective</b></p> <p>Ensure development is compatible with surrounding development and the local context</p>	<p><b>Proposed Modification</b></p> <p>The proposed modification has been designed in consistence with the approved design principles at the site and is compatible with the surrounding development and local context.</p>
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Charter Hall identified three project alternatives which were considered in respect to the identified need for the logistics hub. Each of these options is listed and discussed in the following table.

Table 3 Project Alternatives

<b>Option</b>	<b>Assessment</b>
Do Nothing	<p>The approved development could be delivered in accordance with the current SSD consent. This option was dismissed as the objectives of the project would not be met. The delivery of the approved development would not be possible until the incumbent tenants had ceased their current activities on the site. This would significantly delay the delivery of the benefits of the development including employment opportunities on site and the associated investment in the local and regional economy, as the approved design does not currently meet tenant demand.</p>
Alternative Location	<p>The prospective tenants could potentially be accommodated on other industrial zoned sites within the locality. However, the subject site was considered the most appropriate for the intended uses for the following reasons:</p> <ul style="list-style-type: none"> <li>▪ The site benefits from an existing approval with appropriate conditions of consent that can accommodate the operational needs of the proposed tenants.</li> <li>▪ The required changes to the approved layout can be assessed and determined as a modification to the existing approval.</li> <li>▪ The site is appropriately located within an established industrial aware, away from sensitive land use activities including residential development.</li> <li>▪ The potential environmental impacts of the proposal can be suitably mitigated within the site.</li> <li>▪ The site is well located in terms of access to the regional road network.</li> <li>▪ The potential visual impacts of the proposed development are considered minimal based on the site context and existing and proposed landscaping.</li> </ul>
Alternative Design and Staging	<p>Consideration was given to an alternative proposal which provided for a staged approach, including the reduced GFA and increased outdoor storage area within the first stage, while retaining the approval for the balance of the warehouse GFA to enable its delivery in a second future stage. However, long-term lease</p>

Option	Assessment
	arrangements are proposed to be entered into for the development, as modified. Accordingly, it was considered appropriate to reflect the long-term occupation within the amended approval.

The proposed modification to the development consent was identified as being the most suitable proposal as it allows for warehousing, distribution and logistics purposes in an established industrial precinct. The site design and layout of the built form maintains consistency with the objectives of the IN1 zone and will enhance the underlying industrial character intended for the locality. This will be achieved by the built form which reinforces the industrial nature of the land and is sensitive to the surrounding environment. As the preferred option for the proposal, the site:

- Allows for the development as a permissible use.
- Has appropriate access to the regional road network.
- Is compatible with surrounding development and local context.
- Will generate employment opportunities, thus contributing to the growth of Western Sydney.
- Will result in minimal impact on the environment.
- Will allow for the implementation of suitable mitigation measures where required.

The Minister is the consent authority for the proposal in accordance with section 4.55 of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*. Accordingly, this Modification Application is being lodged with DPIE for assessment.

## 2. STRATEGIC CONTEXT

This section describes the way in which the modified 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.

### 2.1. PROJECT JUSTIFICATION

The consistency with the relevant strategic planning documents and policies is addressed in **Table 4** below. The proposed modifications do not affect the consistency of the approved development with the strategic planning framework as established through the original SSDA.

Table 4 Strategic Planning Framework

Document	Relevance	Consistency
<i>State Environmental Planning Policy (State and Regional Development) 2011</i>	Warehouses or distribution centres over \$30 million are listed in clause 12 in Schedule 1 as being SSD.	The proposed changes do not impact on the classification of the project as SSD.
<i>State Environmental Planning Policy (Infrastructure) 2007</i>	Development proposals that are considered Traffic Generating Development are to be referred to NSW Roads and Maritime Services (RMS) for concurrence. For industrial development, this includes:  20,000m <sup>2</sup> site area or gross floor area with site access to any road; or  5,000m <sup>2</sup> site area or gross floor area with site access to a classified road or to a road that connects to a classified road (if access is within 90 metres of connection, measured along the alignment of the connecting road).	The proposed modifications will reduce the existing warehouse GFA and increase the outdoor storage area. The assessment of the potential traffic impacts concludes the development is acceptable on traffic and transport planning grounds with no adverse impacts to the external road network. Accordingly, a referral to the RMS may not be required.
<i>State Environmental Planning Policy No. 55 – Remediation of Land</i>	SEPP55 requires the consent authority to consider whether the land is contaminated and any remediation required to make the site suitable for its intended use.	Detailed consideration was given to site contamination in the original approval. The modified proposal will comply with the provisions of SEPP 55 (refer to <b>Section 6.1.4</b> ).
<i>State Environmental Planning Policy No. 64 – Advertising &amp; Signage</i>	Approval for signage is sought for estate and building identification signage.	Assessment against the SEPP is provided in <b>Appendix B</b> .
A Metropolis of Three Cities (Region Plan)	Key objectives of the Plan relevant to the proposal are:  Objective 16 Freight and logistics network is competitive and efficient	The modified proposal remains consistent with the Region Plan as it will contribute to maintaining Greater Sydney's 24/7 supply chain operations with safe, efficient and reliable movement of goods. It will provide

Document	Relevance	Consistency
	Objective 23 Industrial and urban services land is planned, retained and managed	appropriate uses on industrial zoned land, contributing to Greater Sydney's industrial and business economic growth and creating local employment opportunities
Western City District Plan	<p>Key priorities of the Plan relevant to the proposal are:</p> <p>Planning Priority W10 Maximising freight and logistics opportunities and planning and managing industrial and urban services land</p> <p>Planning Priority W11 Growing investment, business opportunities and jobs in strategic centres</p>	The development is consistent with the District Plan as it will deliver modern industrial uses to support the Greater Sydney economy and the changing industrial and urban services sector. The proposed modifications reflect market tenant demand and will support the growth and enhancement of industrial land. The proposed changes will create employment opportunities in a designated industrial area and support employment growth in the Campbelltown strategic centre.
Campbelltown Local Strategic Planning Statement	<p>Key priorities of the LSPS relevant to the proposal are:</p> <p>Priority 9 Building an Internationally Recognised Local Economy</p> <p>Priority 11 Striving for Increased Local Employment</p>	The modified proposal will contribute to ensuring Campbelltown's economy is diverse and strengthened. The modification will deliver operational industrial uses in a designated industrial area, strategically located to Campbelltown. The modified layout responds to market demand and will support relationships with new businesses and investors in Campbelltown. The development will generate local investment and job opportunities, contributing to the sustainability and liveability of Campbelltown for residents and businesses. The development is strategically located along the Glenfield to Macarthur Rail Corridor which provides identified opportunities for business growth.

### 3. DESCRIPTION OF MODIFICATIONS

This section of the report describes the proposed modifications, including the amended project description and modified conditions. It includes a comparative analysis of the original development and the proposed modifications, justifying the lodgement of the application in accordance with section 4.55 of the EPA Act 1979.

#### 3.1. OVERVIEW OF PROPOSAL

The proposed modifications to the development as originally granted development consent are listed and briefly described below:

- Modified staging to deliver the development in four stages in a revised order.
- Reduction in warehouse GFA, reduction in office GFA and increased external storage area for Warehouse 1B.
- Reduction in warehouse GFA, reduction in office GFA and increased external storage area for Warehouse 1C.
- Increase in warehouse GFA for Warehouse 1D to reflect revised boundary line between Warehouse 1D and Warehouse 1D.
- Revised car parking provision for Warehouses 1B, 1C and 1D to reflect amended GFA and tenant requirements.
- Reduction in total GFA from 112,000m<sup>2</sup> to 93,378m<sup>2</sup>.
- Increase in outdoor storage area from 6.9 hectares to 8.8 hectares.

The updated architectural drawings are attached as **Appendix D**. A consolidated, detailed description of the modified project is attached as **Appendix A**.

A comparative analysis has been undertaken of the proposed changes to the approved development in accordance with the relevant criteria listed in Appendix B of the DPIE Guidelines and as shown in the following table.

Table 5 Modified Project Summary Table

Element	Original Project	Modified Project
<u>Project Area</u>		
Site Area	29.36 hectares (ha)	29.36 hectares (ha)
Excavation Depth	Less than 1 metre	Less than 1 metre
<u>Physical Layout and Design</u>		
Height of Building	Maximum of 13.7 metres	Maximum of 13.7 metres
Gross Floor Area	Warehouse GFA: 107,000m <sup>2</sup> Office GFA: 5,000m <sup>2</sup>	Warehouse GFA: 89,578m <sup>2</sup> Office GFA: 3,800m <sup>2</sup>
External Storage Area	6.9 hectares	8.8 hectares
Site Access	Via Culverston Road	Via Culverston Road
Parking Spaces	481 car parking spaces and nine (9) accessible spaces	505 car parking spaces including eight (8) accessible spaces

<b>Element</b>	<b>Original Project</b>	<b>Modified Project</b>
	147 provisional car parking spaces	87 provisional car parking spaces
<u>Uses and Activities</u>		
Land Use	Warehouse and distribution centre with ancillary office space	Warehouse and distribution centre with ancillary office space
<u>Project Sequencing</u>		
	Warehouse 1A: 40,000m <sup>2</sup> of warehousing GFA and 2,000m <sup>2</sup> of office GFA	Stage 1: 9,078m <sup>2</sup> of warehousing GFA and 300m <sup>2</sup> of office GFA
	Warehouse 1B: 22,000m <sup>2</sup> of warehousing GFA and 1,000m <sup>2</sup> of office GFA	Stage 2: 9,500m <sup>2</sup> of warehousing GFA and 500m <sup>2</sup> of office GFA
	Warehouse 1C: 22,000m <sup>2</sup> of warehousing GFA and 1,000m <sup>2</sup> of office GFA	Stage 3: 31,000m <sup>2</sup> of warehousing GFA and 1,000m <sup>2</sup> of office GFA
	Warehouse 1D: 23,000m <sup>2</sup> of warehousing GFA and 1,000m <sup>2</sup> of office GFA	Stage 4: 40,000m <sup>2</sup> of warehousing GFA and 2,000m <sup>2</sup> of office GFA

Based on the above, it is considered the proposal is substantially the same development as originally granted consent and is lodged under section 4.551A of the EPA Act 1979.

The key principles of the approved development remain unchanged. Four warehouse or distribution centre buildings will be delivered on site, accessed from Culverston Road. The layout of the warehouse buildings and maximum building heights will also remain unchanged, as will the large outdoor storage area on the eastern part of the site.

The proposed amendments to the GFA are not considered material in the context of the overall development. The additional outdoor storage areas for Stages 1 and 2 are not considered substantial given the approved 6.9 ha outdoor storage area, the reduction in internal warehouse space and the outcomes of the visual impact assessment. The adjustments to the car parking provision on site are minor and reflect the adjustments made to the GFA and outdoor storage areas in Stages 1 and 2.

The proposed modifications do not substantially change the development for which consent was originally granted for the reasons outlined below:

- The development will remain consistent with the land use objectives for Zone IN1 General Industrial.
- The site will continue to consist of a mix of warehousing and outdoor storage as approved.
- The scale of built form is consistent with that approved.
- The access arrangements remain as approved.
- The development will continue to be delivered in four stages.
- The hours of operation remain unchanged.
- Daily trip generation remains consistent with that approved and the level of car parking on site is consistent.

## 3.2. DETAILED DESCRIPTION

### 3.2.1. Project Area

The site is made up of two lots, legally described as Lot 3 DP 817793 and Lot 400 DP 875711. The site has street frontages with Airds Road to the north and west and Rose Payten Road to the south, elevated above the site. The Main Southern Railway runs along the eastern frontage of the site. Culverston Road extends south into the site from a three-way roundabout with Airds Road.

Bow Bowing Creek (a constructed channel) runs along the western boundary of the site. Drainage systems to the east service smaller external catchments and the Main Southern Railway. Two earthen bunds run from the north to the south, parallel to Culverston Road associated with the historical and existing use of the site. The drainage channels provide a significant physical separation between the site boundary and the road reserve for Airds Road, measuring between 18 metres and 58.5 metres.

The site is a brownfield industrial site currently occupied by storage and logistics uses with most of the site currently used for vehicle storage. The site has been extensively modified, and is generally clear of vegetation, except along the site boundaries and Culverston Road. The site is largely impervious consisting of hardstand, asphalt seal spray, shade structures and warehouse and office buildings. Key site attributes are noted as follows:

- Existing development on the site comprises hardstand, shade structures, a main warehouse building and several small detached buildings.
- The site is generally clear of vegetation, with the exception of planting adjacent to the site boundaries.
- The topography of the site is characterized by a gradual fall from the south-east to north-western corners of the site.
- Existing services including sewerage, electricity and water, are located throughout the site and concentrated in the immediate vicinity of Culverston Road. Drainage systems are located predominantly adjacent to the site boundaries and Culverston Road. Two Telstra pits are located under Culverston Road in the northern part of the site.
- Access is obtained via Culverston Road from the round-about intersection of Culverston Road and Airds Road.
- The eastern boundary corresponds with a drainage corridor and the Main Southern Railway line while the site's western boundary corresponds with the Bow Bowing Canal. The site's northern and southern boundaries also correspond with drainage channels.

The site is located in an existing industrial area. General Industrial zoned land is located to the north, east and west with existing warehousing, manufacturing, automotive and industrial operations. Business Development zoned land is to the south west, containing automotive related businesses. Nearby residential areas include the low density residential suburbs of Woodside to the west and Leumeah and Minto to the east and south. The nearest residential receiver is located approximately 300 metres to the west of the site on Queenscliff Drive in Woodbine. This property backs onto Campbelltown Road and is separated from the site by the existing industrial development to the west of Airds Road.

The development occupies most of the site area as shown in **Figure 5** with a landscaped buffer to each site frontage. The proposal is for the redevelopment of the whole site area including retention of trees where possible and the removal of trees nominated within the approved landscape plans. The site does not contain any threatened species, ecological communities or habitats. The proposed site is affected by 1% AEP flood event. As approved, the site is proposed to be filled above the 1% AEP flood level mitigating any adverse flood impacts

The project area for the proposed modification remains as per the SSD approval. The proposed modification has been designed to respond to the site context, opportunities and constraints.

Figure 4 Approved site plan

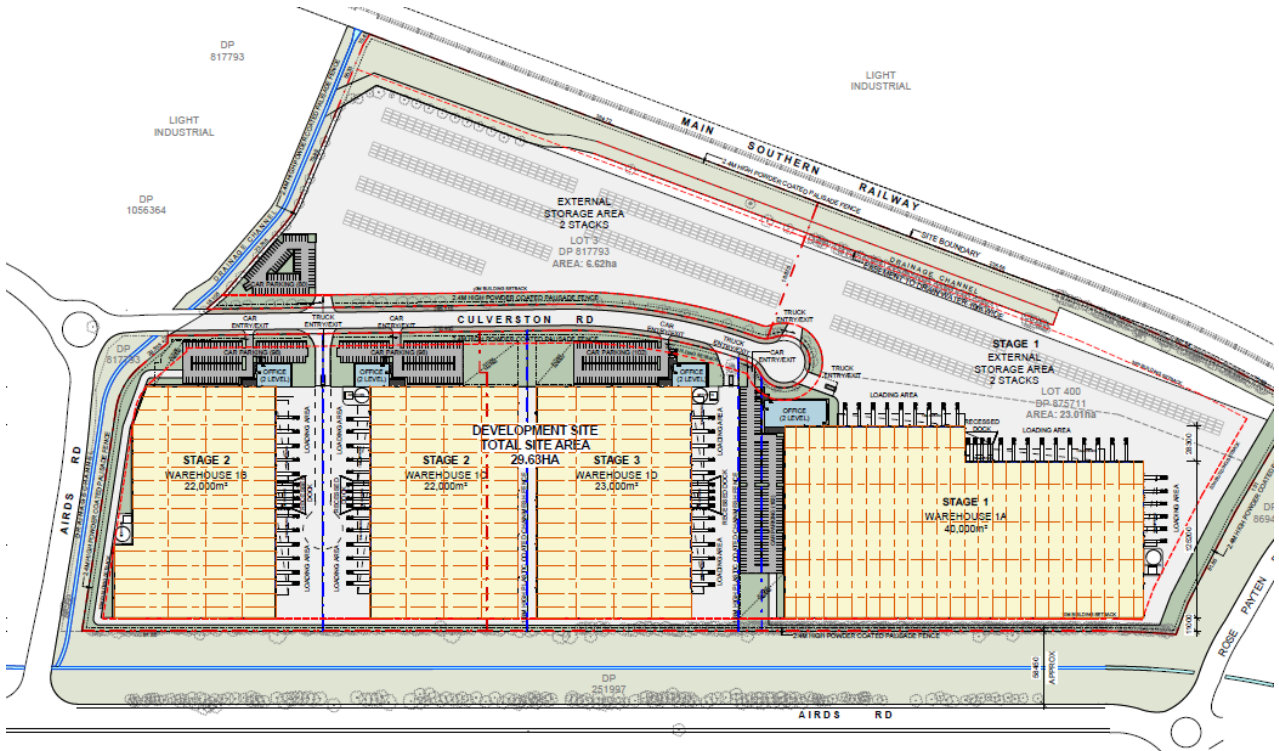
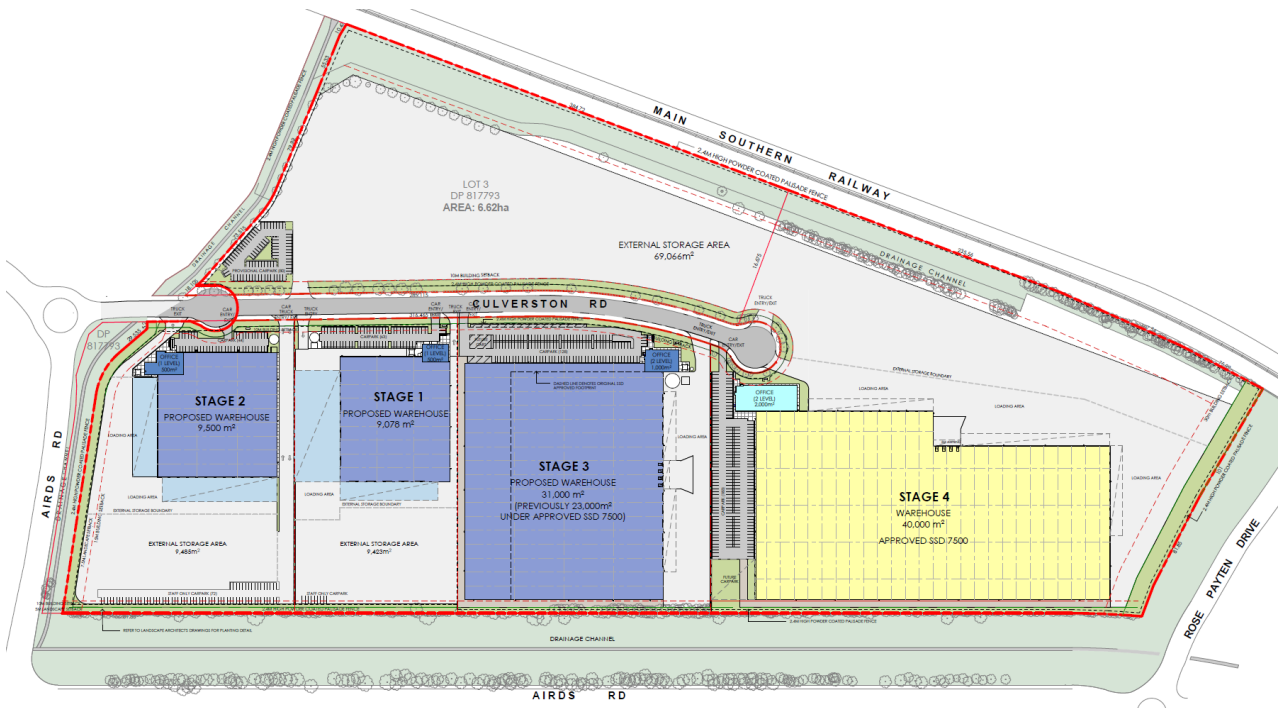


Figure 5 Proposed modified site plan



Source: Watch This Space Design

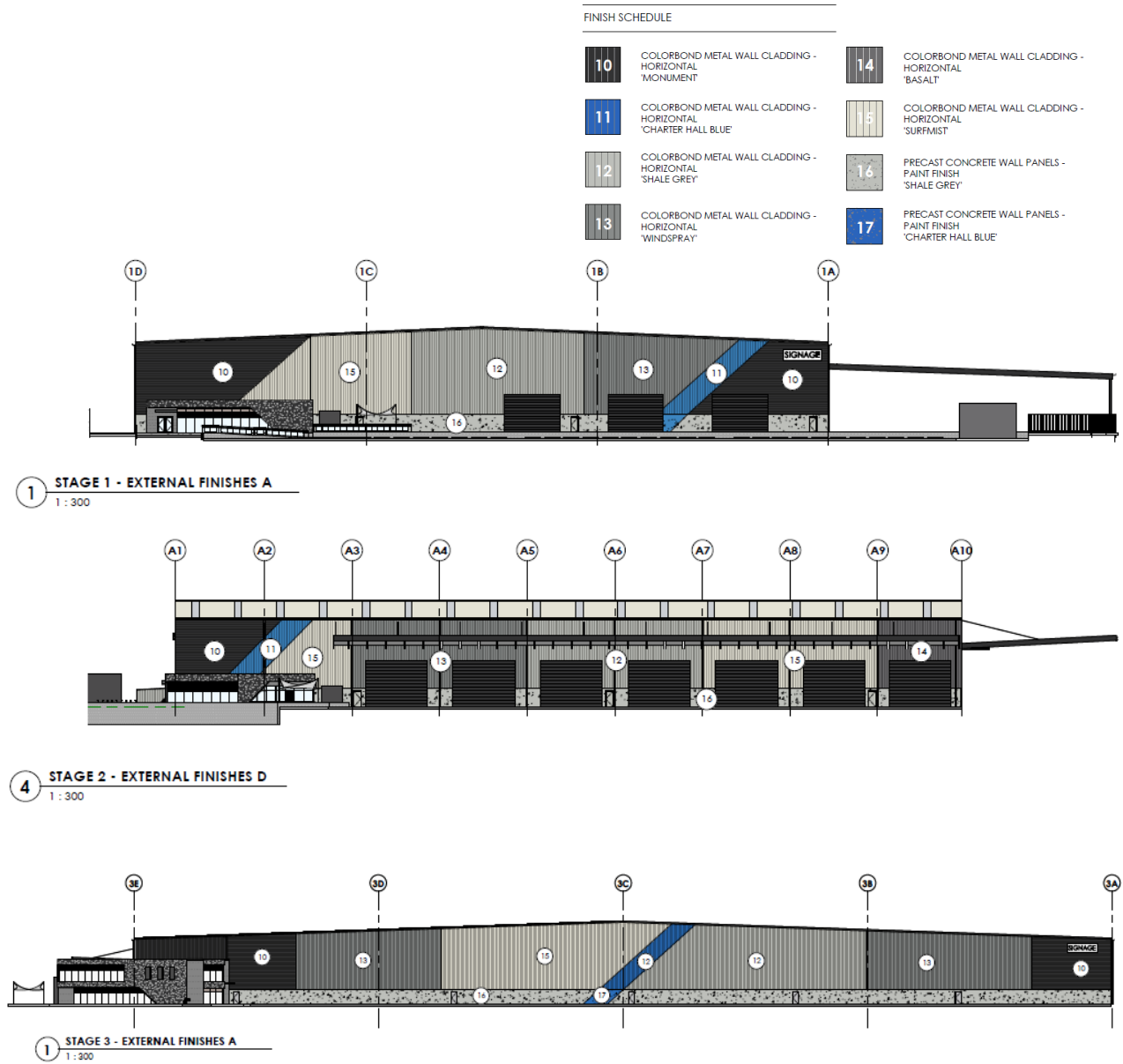
### 3.2.2. Physical Layout and Design

The proposed site layout takes into consideration the existing site conditions and has been developed with regard to the functional requirements of the warehouse and distribution uses. As shown in **Figure 5**, the proposed modification includes:

- A reduction in the size of the warehouses to be constructed within Stages 1 and 2 from 22,000m<sup>2</sup> and 22,000m<sup>2</sup> to 9,078 m<sup>2</sup> and 9,500m<sup>2</sup> (GFA) respectively.

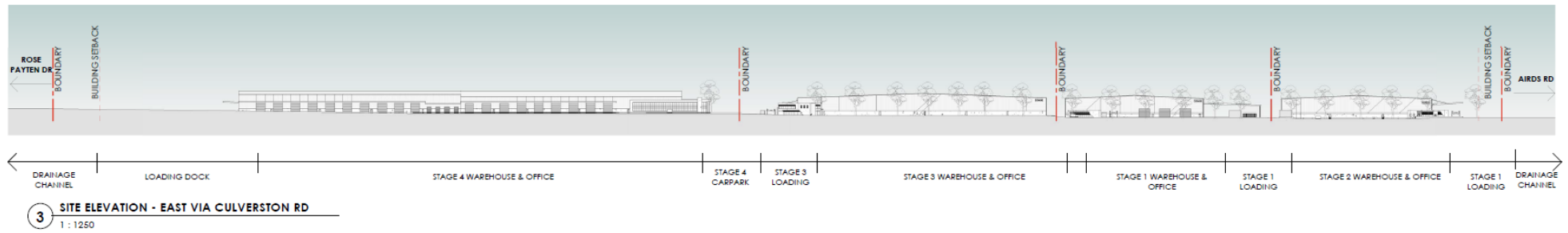
- A reduction in the provision of ancillary office space to be constructed within Stages 1 and 2 from 1,000m<sup>2</sup> and 1,000m<sup>2</sup> to 300m<sup>2</sup> and 500m<sup>2</sup> (GFA) respectively.
- An increase in the warehouse GFA to be constructed within Stage 3 to reflect the adjusted lot boundary between Stages 2 and 3 from 23,000m<sup>2</sup> to 31,000m<sup>2</sup>. The adjusted lot boundary allows for Stage 1 to be delivered prior to the lease expiry of the existing use on the Stage 3 site area.
- An overall reduction in warehouse and office GFA to be provided on site from 112,000m<sup>2</sup> to 93,378m<sup>2</sup>.
- The orientation of the warehouse within Stage 2 has been adjusted to allow for a regular form warehouse to be delivered, to make best use of the irregular shaped portion of the site towards Airds Road/Culverston Road to be used for vehicular access, and to provide separate heavy vehicles access for both Stages 1 and 2.
- An increase in the number of at-grade car parking spaces to be provided on site from 490 to 505, with the spatial provision for 87 at-grade future provisional car parking spaces, a reduction from the 147 provisional car parking spaces approved. The amended car parking provision is proposed to respond to the tenant operational parameters for Stages 1 and 2.
- An increase in outdoor storage area at the site from 6.9ha to 8.8ha with the construction of additional at-grade outdoor storage areas within Stages 1 and 2. The existing consent provides for two stacked container levels within the outdoor storage area in Stage 1, which equates to approximately 5.2 metres from the existing ground level. The proposal seeks to allow for outdoor storage in Stage 2, up to 7.5 metres to respond to prospective tenant requirements.
- Provision of bicycle parking adjacent to each warehouse and outdoor staff amenity areas within Stages 1 and 2 to the west of Culverston Road.
- Landscaped setbacks to the site boundaries and along Culverston Road. The tree planting along the site boundaries includes native species such as Angophora, Eucalyptus and Corymbia. This tree planting will be installed at a pot size of 400L with heights of 4–5 metres at installation and over 30 metres at full maturity. Native shrubs along the site boundaries include Acacia, Banksia & Melaleuca which will have a height of approximately 0.5-1m at installation and between 2–5 metres at full maturity.
- Palisade fencing is proposed behind the landscaped setback along the Airds Road and Culverston Road frontages and along the side and rear boundaries.
- As per SSD 7500, existing on-site vegetation is to be retained where practical and feasible. The Modification does not propose to amend the approved removal of existing landscape vegetation primarily along Culverston Road and at the site perimeter.
- Services infrastructure connections and upgrades to serve the development.

Figure 6 Proposed materials and finishes



Source: Watch This Space Design

Figure 7 Site section and elevation



Source: Watch This Space Design

### 3.2.3. Uses and Activities

As per the SSD approval, the proposed modification makes not change to the warehouse and distribution centre use with ancillary office space. Uses will include the storage and distribution of goods.

As approved, activities on site in relation to the proposed modification will include:

- The loading, unloading and handling of goods and materials
- Heavy service vehicle movements and car parking
- Arrival and departure of employees
- The handling of goods and materials for the purposes of outdoor storage
- Warehouse and distribution uses will operation 24 hours a day, 7 days a week.

#### 3.2.3.1. Demolition and Earthworks

The demolition and earthworks for the proposed modification will be consistent with the SSD approval. The existing warehouse and office buildings, hardstand and hail structures will be demolished to enable the redevelopment of the site. As per the SSD conditions of consent, a detailed Construction Management Plan (CMP) will be prepared by the appointed contractor prior to demolition works commencing and submitted to the relevant consent authority. The CMP will outline the extent of demolition works and the process and techniques to ensure the appropriate disposal of materials.

The proposed modification makes no change to the earthworks proposed at the site. The development includes bulk earthworks and the importation 231,400m<sup>3</sup> of fill to create level building pads for the four warehouse buildings. The bulk earthworks are described within the Civil Engineering Report at **Appendix F**.

#### 3.2.3.2. Stormwater Management

In accordance with the SSD approval, the proposed modification will result in finished site levels above the 100 year ARI levels and therefore will be no impact on adjoining properties in a 100 year ARI event.

During a Probable Maximum Flood (PMF) event, the site and Culverston Road would be impacted by high hazard flood flows potentially preventing site evacuation by vehicle and on foot. Warning times during a PMF event would be short (potentially 10 minutes) due to the extent of catchment urbanisation and short run-off times.

Due to the short response times, on-site refuge is the only feasible option in extreme flood events. As per the SSD approval, the proposed modification will provide adequate measures including on-site refuge facilities and flood evacuation plan are capable of managing worker safety during a PMF or extreme flood event.

In accordance with the conditions of consent, the preparation of a stormwater management plan prior to the commencement of construction, preparation of a flood emergency response plan, and the submission of work as executed drawings of stormwater infrastructure and refuges constructed on-site prior to the issue of any occupation certificate will be undertaken for the proposed modification.

#### 3.2.3.3. Transport and Parking

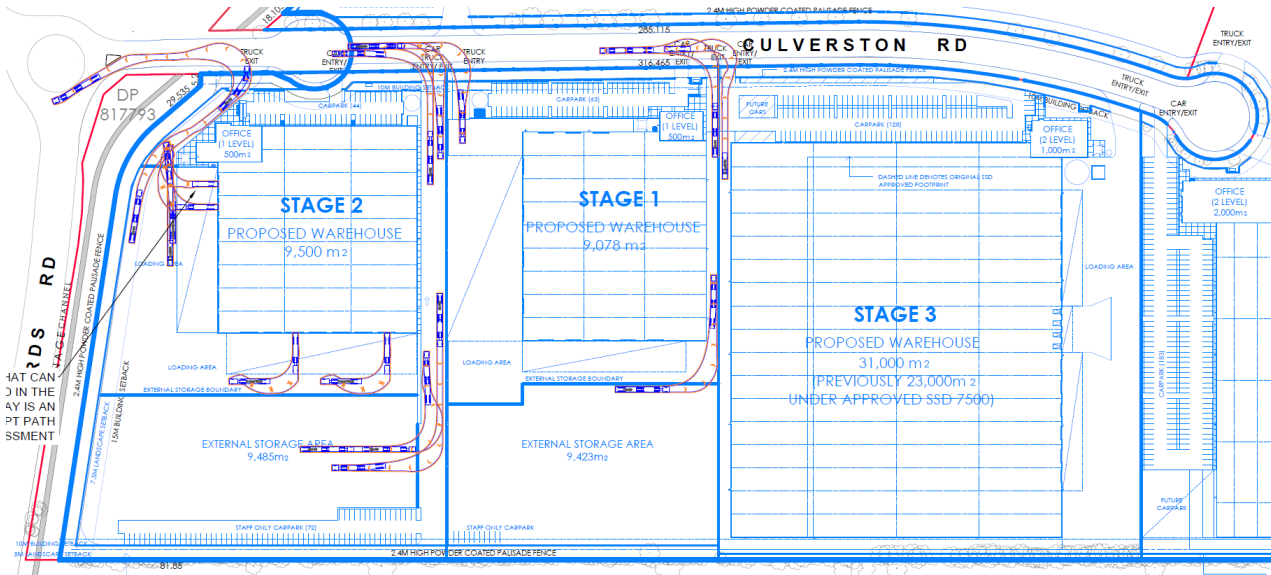
##### Construction

For the proposed modification, and in accordance with the SSD approval, all construction vehicles will access the site via the existing heavy vehicle access to Culverston Road during the construction stages. During construction, heavy vehicle movements will be generated from bulk earthworks, fill importation and delivery of construction equipment and materials. As per SSD-7500, construction will be carried out in three phases consisting of site preparation, earthworks and infrastructure; warehouse construction and fit-out; and site demobilisation, post-construction site rehabilitation, landscaping and finishing works. Construction activities are proposed during standard construction hours of Monday to Friday 7am to 6pm, Saturday 8am to 1pm and no works on Sundays and public holidays. Some out of hours work may be needed to minimise disruption to the road network.

## Operation

For the proposed modification, and in accordance with the SSD approval, during operation all vehicles will access the site via Culverston Road. The proposed modification now provides for each stage of the development to have a separate heavy vehicle access from Culverston Road and car parking. The development is to provide an increase in at-grade car parking spaces to 505, motorcycle parking spaces and bicycle parking spaces for staff and visitors apportioned by stage. Car parking sufficient for the operation of each of the stages will be completed prior to the operation of that stage.

Figure 8 Proposed development operational swept path diagrams



## 3.2.4. Timing

### 3.2.4.1. Stages

SSD-7500 approved the redevelopment of the site in three stages. The modified proposal is for the development to be constructed in four stages, to allow the delivery of each of the warehouses as efficiently as possible. The proposal for the staged construction of the four warehouses is set out below. It is anticipated that construction will begin in early 2022 (pending timely development approval). The first phase of construction will consist of demolition, site preparation and earthworks for Stages 1 and 2 which will be undertaken under the existing SSD consent. Following this infrastructure works for and the construction of Stages 1 and 2 will be undertaken. As per the SSD approval, the eastern outdoor storage area will be constructed as market demand requires and is not a part of the staged warehouse construction. The required car parking allocations will be delivered as part of each stage.

- Stage 1: 9,078m<sup>2</sup> of warehousing GFA and 300m<sup>2</sup> of office GFA
- Stage 2: 9,500m<sup>2</sup> of warehousing GFA and 500m<sup>2</sup> of office GFA
- Stage 3: 31,000m<sup>2</sup> of warehousing GFA and 1,000m<sup>2</sup> of office GFA
- Stage 4: 40,000m<sup>2</sup> of warehousing GFA and 2,000m<sup>2</sup> of office GFA

The revised staging for the delivery of the development reflects the current tenant demand for the smaller sized warehouses, and will allow the delivery of these warehouses prior to the lease expiry for the existing use located within the Stage 3 site area.

The anticipated timing of construction is summarised below however a Staging Report will be submitted to the relevant consent authority prior to the commencement of construction in accordance with the conditions of consent.

- Demolition, site preparation and enabling works for Stages 1 and 2 are anticipated to commence in late 2021 and will involve the demolition of existing buildings, structures and hardstand on the site area, bulk earthworks and enabling works. Construction access will be via Culverston Road.

- Construction of Stage 1 is anticipated to be undertaken from Q1 2022 (subject to approval). This stage will involve the establishment of a construction zone in the north-west corner of the site, the establishment of a construction waste storage area, the establishment of a construction loading area and the construction of the warehouse, hardstand for car parking and outdoor storage and boundary treatments. Construction access will be via Culverston Road.
- Construction of Stage 2 is anticipated to be undertaken from Q1 2022 (subject to approval). This stage will involve the construction of the warehouse, hardstand for car parking and outdoor storage and boundary treatments. Construction access will be via Culverston Road.
- The construction of Stage 1 is anticipated to be completed and operational by June 2022 and the construction of Stage 2 is anticipated to be completed and operational by September 2022.

### 3.2.4.2. Phases

Construction of each stage will be delivered across multiple phases including:

- Site preparation and earthworks (to be completed under existing SSD-7500 approval for Stages 1 and 2)
- Stormwater and services infrastructure
- Warehouse construction and fit-out
- Site demobilisation, post-construction site rehabilitation, landscaping and finishing works.

The site preparation and earthworks are anticipated to be completed within 3 months and infrastructure and above ground built form is anticipated to be 6-9 months. The construction phase for each of the stages is generally anticipated to be 9-12 months.

## 3.3. PROPOSED AMENDMENTS TO CONDITIONS OF CONSENT

This section outlines the proposed replacement and/or rewording of the description of the approved development and conditions of consent imposed by the Commission. The proposed modifications are shown by a strike through the deleted text and red text for new text.

### 3.3.1. Description of Development

The description of development is proposed to be amended to reflect the proposed modifications to the development and staging as outlined in **Section 3**. The description of development is proposed to be amended as follows:

*Construction, fit-out and operation of a warehouse and logistics hub with ~~112,000~~ 93,378 m<sup>2</sup> of gross floor area (GFA) including:*

- *Four warehouse buildings for warehousing and distribution uses, with ancillary offices, comprised of:*
  - ~~Warehouse 1A: 40,000 m<sup>2</sup> of warehousing GFA and 2,000 m<sup>2</sup> of office GFA~~
  - ~~Warehouse 1B: 22,000 m<sup>2</sup> of warehousing GFA and 1,000 m<sup>2</sup> of office GFA~~
  - ~~Warehouse 1C: 22,000 m<sup>2</sup> of warehousing GFA and 1,000 m<sup>2</sup> of office GFA~~
  - ~~Warehouse 1D: 23,000 m<sup>2</sup> of warehousing GFA and 1,000 m<sup>2</sup> of office GFA~~
  - **Stage 1: 9,078 m<sup>2</sup> of warehousing GFA and 300 m<sup>2</sup> of office GFA**
  - **Stage 2: 9,500 m<sup>2</sup> of warehousing GFA and 500 m<sup>2</sup> of office GFA**
  - **Stage 3: 31,000 m<sup>2</sup> of warehousing GFA and 1,000 m<sup>2</sup> of office GFA**
  - **Stage 4: 40,000 m<sup>2</sup> of warehousing GFA and 2,000 m<sup>2</sup> of office GFA**
- ~~6.9~~ **8.8** *hectares of external hardstand storage space for warehousing and logistics uses;*
- *Bulk earthworks;*
- *Demolition of existing structures and hardstand areas;*
- *Remediation works;*

- Upgrades to existing on-site infrastructure;
- Loading docks;
- Car parking;
- Site landscaping; and
- Estate and building identification signage.

### 3.3.2. Condition A2 Approved Documents

It is proposed to amend Condition A2 to update the approved documents in accordance with the proposed modification. The proposed condition amendment is as follows:

A2 *The Applicant, in acting on this consent, must carry out the Development in accordance with the:*

(a) *State significant development application SSD 7500*

(b) *EIS, RTS and Supplementary RTS*

~~(c) *Drawings listed at Appendix A; and*~~

~~(d) *Management and Mitigation Measures at Appendix B.*~~

*As modified by:*

*(c) SSD 7500 MOD1 Modification Report including drawings listed at Appendix A and Management and Mitigation Measures at Appendix C.*

### 3.3.3. Condition A6 External Storage

It is proposed to amend Condition A6 to allow for the stacking of goods/materials up to 7.5 metres in height within the Stage 1 external storage area to allow for the materials stacking system employed by the prospective tenant. The proposed condition amendment is as follows:

A6. *At all times under this consent, the Applicant must ensure containers stored on the external storage area may only be stacked as follows:*

*(a) Eastern side of Culverston Road: two containers high from the existing ground level.*

*(b) Stage 1 (external storage area): two containers high from the existing ground level.*

*(c) Stage 2 (external storage areas): 7.5 metres from the existing ground level.*

### 3.3.4. Condition B3 Car Parking

It is proposed to amend Condition B3 to reflect the revised car parking provision to meet tenant requirements and to reflect the changes to the GFA proposed. The proposed condition amendment is as follows:

B3. *The Applicant must provide a minimum of ~~484~~ 505 car parking spaces and ~~nine (9)~~ including eight (8) accessible spaces on-site, in accordance with the relevant Australian Standards.*

### 3.3.5. Condition B4 Car Parking

It is proposed to amend Condition B4 to reflect the revised quantum of car parking provided in Stages 1 and 2. The proposed condition amendment is as follows:

- B4. In the event of a demonstrated car parking shortage in the operation of the site, Council may request the Applicant to introduce the ~~147~~ **87** additional parking spaces in the areas identified for 'future parking' in the Site Masterplan (~~Overall~~), – Stage 1, 2, 3 & 4 ~~issue 9 Rev. C~~, prepared by ~~Reid Campbell~~ **Watch This Space Design**, dated ~~24/02/2017~~ **06/10/2021**.

### 3.3.6. Condition B16 Rainwater Harvesting

It is proposed to amend Condition B16 to update the rainwater harvesting requirements for each warehouse in accordance with the CDCP 2015. Council confirmed the rainwater harvesting requirement for the development should be in accordance with CDCP 2015 Policy 2.4 Sustainable Building Design. The proposed condition amendment is as follows:

The Applicant must provide a ~~total~~ rainwater harvesting capacity of ~~100,000 litres~~ for each warehouse building **as follows**:

<b>Roof Area</b>	<b>Capacity of Rainwater Tank</b>
<b>1,001 m<sup>2</sup> to 5,000 m<sup>2</sup></b>	<b>10,000L</b>
<b>5,001 m<sup>2</sup> to 10,000 m<sup>2</sup></b>	<b>20,000L</b>
<b>10,001 m<sup>2</sup> to 20,000 m<sup>2</sup></b>	<b>50,000L</b>
<b>above 20,000 m<sup>2</sup></b>	<b>100,000L</b>

### 3.3.7. Condition B34 Remediation

It is proposed to amend Condition B34 to reflect the updated staging for the delivery of the warehouses across the site. The principle for the remediation of the area of environmental concern within Stage 3 remains as approved and in accordance with Remediation Action Plan. The proposed condition amendment is as follows:

*Prior to the commencement of construction, except for the extent of demolition works required to access the area of environmental concern and the construction works associated with ~~warehouses~~ **Stages 1A, 1B 1, 2 and 1C 4**, the Applicant must remediate the area of environmental concern within the site identified in, and in accordance with the Remedial Action Plan endorsed by the appointed NSW EPA Site Auditor.*

### 3.3.8. Condition B44 Landscape Management Plan

It is proposed to amend Condition B44 to update the reference to the Site Masterplan to reflect the amended Site Masterplan. The proposed condition amendment is as follows:

*Prior to the commencement of construction, the Applicant must prepare a Landscape Management Plan (LMP) to manage the revegetation and landscaping works on-site, to the satisfaction of the Secretary. The plan shall form part of the CEMP required by Condition C2 and be prepared in accordance with Condition C7. The LMP shall:*

- (a) *Detail the species to be planted on-site;*
- (b) *Demonstrate the landscape plans have been revised to ensure the perimeter fence line of the Development is set back a minimum of 3 metres from the property boundary of the site and is consistent with plan Site Masterplan (~~Overall~~), – Stage 1, 2, 3 & 4 ~~issue 9 Rev. C~~, prepared by ~~Reid Campbell~~ **Watch This Space Design**, dated ~~24/02/2017~~ **06/10/2021**;*
- (c) *Ensure any plantings in the vicinity of the Endeavour Energy electricity easements do not exceed a mature height of 3 metres;*
- (d) *Describe the monitoring and maintenance measures to manage revegetation and landscaping works; and*
- (e) *Be consistent with the Applicant's Management and Mitigation Measures in this Development Consent.*

## 4. STATUTORY CONTEXT

This section of the report provides an overview of the key statutory requirements relevant to the site and the project as proposed to be modified. It identifies the key statutory matters which are addressed in detail within **Section 6**, including the power to grant consent, permissibility, other approvals, pre-conditions and mandatory considerations.

**Table 6** categorises and summarises the relevant requirements in accordance with the DPIE *State Significant Development Guidelines*, including section references identifying where each matter is addressed within the Modification Report.

Table 6 Identification of Statutory Requirements for the Project

<b>Statutory Relevance</b>	<b>Action</b>	<b>Consistency with Approved Development</b>
<i>Power to grant approval</i>	In accordance with Schedule 1 of the SRD SEPP, development that has a CIV of more than \$30 million for the purpose of warehouses or distribution centres are classified as SSD.	The proposed modification to the approval of SSD-7500 will remain consistent with this SEPP and is appropriately characterised as SSD.
Permissibility	The site is zoned IN1 in accordance with the CLEP 2015. Warehouse and distribution centres are permissible with consent in the IN1 Zone.	The proposed modification remains permissible within the IN1 zone.
<b>Other approvals</b>		
No requirements for other approvals have been identified for the Modification.		

**Table 7** outlines the relevant pre-conditions to exercising the power to grant approval which were considered in the original SSDA.

Table 7 Mandatory Considerations

<b>Statutory Reference</b>	<b>Mandatory Consideration</b>	<b>Section in Modification Report</b>
Consideration under the EP&A Act and Regulation		
Section 1.3	Relevant objects of the EP&A Act	<b>Appendix B</b>
Section 4.15	Relevant environmental planning instruments	
	<ul style="list-style-type: none"> <li>▪ SEPP 55 – Remediation of Land</li> </ul>	<b>Section 6 and Appendix H</b>
	<ul style="list-style-type: none"> <li>▪ SEPP 64 – Advertising Structures and Signage</li> </ul>	<b>Appendix B</b>
	<ul style="list-style-type: none"> <li>▪ Campbelltown LEP 2015</li> </ul>	<b>Appendix B</b>
	Relevant draft environmental planning instruments	
	<ul style="list-style-type: none"> <li>▪ Draft State Environmental Planning Policy (Remediation of Land)</li> </ul>	<b>Section 6 and Appendix H</b>

<b>Statutory Reference</b>	<b>Mandatory Consideration</b>	<b>Section in Modification Report</b>
	Relevant planning agreement or draft planning agreement <ul style="list-style-type: none"> <li>None relevant to the proposed development</li> </ul>	N/A
	Development Control Plans <ul style="list-style-type: none"> <li>Campbelltown Development Control Plan 2015 (CDCP 2015)</li> </ul>	<b>Appendix B</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.	<b>Section 7.3.6</b>
	The suitability of the site for the development	<b>Section 7.3.7</b>
	The public interest	<b>Section 7.3.9</b>
Section 4.55	The proposed development is substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all).	<b>Section 3</b>
<b>Mandatory relevant considerations under EPIs</b>		
CLEP 2015	Objectives and land uses for IN1 Zone Part 4 – Principal development standards <ul style="list-style-type: none"> <li>Clause 4.1 Minimum subdivision lot size</li> <li>Clause 4.3 Height of buildings</li> <li>Clause 4.4 Floor space ratio</li> </ul> Part 5 – Miscellaneous provisions <ul style="list-style-type: none"> <li>Clause 5.10 Heritage conservation</li> <li>Clause 5.21 Flood planning</li> </ul> Part 7 – Additional local provisions <ul style="list-style-type: none"> <li>Clause 7.1 Earthworks</li> <li>Clause 7.3 Riparian land and watercourses</li> </ul>	<b>Appendix B</b>
<b>Development Control Plans</b>		
CDCP 2015	Clause 11 of the SDR SEPP states that development control plans (whether made before or after the commencement of this Policy) do not apply to SSD.	<b>Appendix B</b>

Statutory Reference	Mandatory Consideration	Section in Modification Report
	<p>As such, there is no requirement for assessment of the proposal against the CDCP 2015 for this SSDA. Notwithstanding this, consideration has been given to the following provisions:</p> <p>Part 2 Requirements Applying to All Types of Development</p> <ul style="list-style-type: none"> <li>▪ 2.4.1 Rain Water Tanks</li> <li>▪ 2.21 Acoustic Privacy</li> </ul> <p>Part 7 Industrial Development</p> <ul style="list-style-type: none"> <li>▪ 7.2 Building Form and Character</li> <li>▪ 7.2.2 Building Setbacks</li> <li>▪ 7.2.3 Fences</li> <li>▪ 7.3 Car Parking and Access</li> <li>▪ 7.4 Landscaping</li> <li>▪ 7.5 Outdoor Storage Areas</li> </ul>	

## 5. STAKEHOLDER ENGAGEMENT

Stakeholder engagement has been undertaken by Charter Hall during the preparation of the Modification Report. This included direct engagement and consultation with:

- Department of Planning, Industry and Environment (DPIE): the proponent met with DPIE on two occasions, including 17 June and 21 September 2021.
- Campbelltown City Council (CCC): Charter Hall met with officers from Council on 9 July 2021.

A summary of the responses to issues raised by stakeholders during the engagement process is provided in the table below. Each of the issues has been categorised in accordance with DPIE guidelines.

Table 8 Stakeholder Views

Issue	Applicant Response
<b>Strategic Context</b>	
None relevant	N/A
<b>Project and Key Alternatives</b>	
<p>Council raised concerns regarding the proposed hardstand areas within Stages 1 and 2 due to its visibility from Airds Road. Council advised that landscaping should not be relied upon to screen the hardstand areas as the existing tree coverage in this location is patchy and new landscaping would take several years to grow large enough to provide screening.</p> <p>Council also raised concerns in relation to the configuration of the fencing and landscaped setback to the site boundary, advising that the preference was for the approved configuration to remain.</p>	<p>In response to the advice received from Council, a View Impact Assessment of the proposed amendments to the built form and outdoor storage areas has been undertaken to assess potential visual impacts of the modified proposal on the public domain.</p> <p>Detailed consideration has been given to the proposed landscape treatment, including plant species selection and plant sizes to provide for visual screening of the proposed outdoor storage areas at the commencement of operation. Native shrubs will supplement the proposed trees. At installation, these species will be approximately between 0.5m – 1 metre in height. At full maturity, these shrubs will range in height between 2–5 metres adding additional understorey screening as the trees mature and increase in height.</p> <p>Palisade fencing is proposed which is of a high quality and an attractive appearance. The fencing is to be located behind the landscaped setback, consistent with Council’s DCP requirement for the fencing to be setback from the property boundary.</p>
<b>Statutory Issues</b>	
DPIE indicated the modification application could potentially be lodged under section 4.55(1A) of the Act, subject to a further detailed assessment of the potential environmental impacts of the proposed changes.	The proposed modification has been assessed in detail, including a comprehensive analysis of the potential transport and traffic, visual impact and urban design and acoustic impacts.

Issue	Applicant Response
	The supporting reports demonstrate the potential environmental impact is minimal. Accordingly, the application is lodged under section 4.55(1A) of the Act.
Discussions with CCC confirmed a reduced requirement for rainwater harvesting for each warehouse building in accordance with <i>Campbelltown Development Control Plan 2015</i> (CDCP 2015).	Condition B16 is proposed to be amended in accordance with the advice received from Council.
<b>Future Community Engagement</b>	
None relevant	N/A
<b>EIS Matters</b>	
<p>The Modification Report must be easy to understand, rigorous and as succinct as possible, and should:</p> <ul style="list-style-type: none"> <li>▪ include a short description of the approved development and the reasons why the modifications are required</li> <li>▪ describe the proposed modifications (including a comparison of quantitative and qualitative differences against the current operation of the development, interaction with ancillary facilities, etc.) and provide a discussion on why the modified operation of the development would be substantially the same</li> <li>▪ identify any conditions in the existing development consent, as modified, that you are seeking to change</li> <li>▪ explain the relevant strategic and statutory context</li> <li>▪ describe the findings of any engagement/s with the local community and the relevant public authorities</li> <li>▪ assess the relevant impacts associated with the modified warehouse facility. This should include but not limited to traffic impact assessment, noise impact assessment, and where relevant, covering other specific environmental considerations identified in the existing consent.</li> </ul>	This Modification Report has been prepared in response to the advice received from DPIE in relation to the content of the Report and supporting documents including assessments of the proposed modification in relation to traffic and parking, noise impacts and flooding and stormwater.

Issue	Applicant Response
<ul style="list-style-type: none"> <li>- the level of detail provided should be commensurate with the resulting impacts and mitigation required</li> <li>- the traffic impact assessment should address parking numbers, changes to traffic generation and demonstration that new access arrangements and internal roads are manoeuvrable and safe</li> <li>- a noise assessment should assess the impact the change to loading dock position will have on surrounding sensitive receivers, including any resultant mitigation measures</li> <li>- an updated flood and stormwater assessment will be required if the proposal conflicts with that considered under the original consent</li> <li>- it is noted the original EIS has a clause 4.6 variation request regarding the height. Any changes to building height will need to be addressed in the modification report.</li> </ul> <p>▪ evaluate the merits of the modification.</p>	
<b>Beyond Scope or Issues Not Relevant to Project</b>	
None relevant	N/A

## 6. ASSESSMENT OF IMPACTS

This section provides a comprehensive description of the updated specialist technical studies undertaken to assess the potential impacts of the proposed modifications and the updated mitigation, minimisation and management measures recommended to avoid unacceptable impacts.

The detailed technical reports and plans prepared by specialists and appended to the Modification Report are individually referenced within the following sections. A summary of the updated mitigation measures is provided as **Appendix C**.

### 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. Traffic and Transport

A Traffic Impact Assessment (TIA) has been prepared by Ason Group and is provided at **Appendix I**.

##### 6.1.1.1. Existing Environment

The site is located an existing industrial area with several connections to the regional and classified road network. The proposed development would generate additional light and heavy vehicle movements to, from and within the site during construction and operation.

The TIA prepared in support of SSD-7500 assessed the potential traffic and parking impacts of the construction of bulk earthworks and estate wide infrastructure as well as the construction and operation of the proposed warehouse buildings and was found to be acceptable.

##### 6.1.1.2. Potential Impacts

###### Site Access

Airds Road is the main link from the arterial and sub-arterial road network to the site. Key nearby arterial roads include the Hume Highway and Campbelltown Road to the east and Pembroke Road to the west. Key sub-arterial roads include Rose Payten Road to the south and Ben Lomond Road to the north.

Access to the site during operation and construction will be via Culverston Road. Each warehouse building would have separate driveways for staff and heavy vehicle access from Culverston Road.

The primary haul route to and from the site would be via Campbelltown Road, with trucks accessing the site from the Hume Highway either via the Campbelltown Road interchange from the north or the Narellan Road interchange via Blaxland Road from the south. Both of these routes are currently identified as heavy vehicle routes up to B-Doubles by the RMS.

Swept path diagrams for the proposed modification are provided within the TIA at **Appendix I** in compliance with the relevant Australian Standards.

###### Construction Traffic

Under SSD-7500, the construction traffic generated by the proposed development was assessed and found to be acceptable, with the existing local road network able to accommodate the construction traffic volumes.

As the modification proposes a reduction in overall GFA at the site, it is considered that the construction traffic generation will be equal to or less than that approved. The construction of the development will be undertaken in accordance with the required conditions of consent including the preparation of a Construction Environmental Management Plan to the satisfaction of the Secretary prior to the commencement of construction.

###### Operational Traffic

The TIA prepared in support of SSD-7500 considered the operational traffic impacts associated with additional vehicle movements to and from the site during operation. This included a 7 day, 24-hour traffic count survey of Culverston Road to establish existing traffic volumes associated with current on-site

operations. The TIA included SIDRA modelling to assess the predicted impacts of the development during operation on the local road network and key nearby intersections, in accordance with Roads and Maritime Services (RMS) Guidance. The assessment of SSD-7500 found that the proposed development would not adversely impact the local road network and existing road users.

The TIA prepared in support of this modification undertakes an assessment of the predicted traffic generation as a result of the modified development. This updated trip generation assessment makes use of the now known operational information in relation to the prospective tenants for Stages 1 and 2, as well as referencing the RMS trip generation rates used to determine the traffic generation under SSD-7500.

The TIA finds that, as a result of the proposed modification, the daily traffic generation is expected to be less than that approved for the site under SSD-7500. As a result of the tenant operational information used to assess the predicted trip generation for Stages 1 and 2, the TIA finds that there will be an increase in traffic generation during the AM and PM peaks. The traffic generation assessment for the proposed modification is summarised in **Table 9** below.

Table 9 Traffic Generation comparison

Application	Daily	AM Peak	PM Peak
SSD-7500	2,352	175	176
Proposed Modification	2,086	198	222
<b>Difference</b>	<b>-226</b>	<b>+23 (13%)</b>	<b>+46 (26%)</b>

Source: Ason Group

The TIA assesses the increase in the PM peak hour at the key intersections assessed under SSD-7500. The TIA finds that when distributed across the study network, the increase in trips is minimal, with a maximum of 26 veh/hr for the left-turn movement at the Airds Road / Culverston Road roundabout. This equates to an additional vehicle every 2 minutes. Noting that this intersection was found to be operating at a LoS A in both peak hours, this volume of traffic would not have a material impact on the operation of this intersection. As such, it is considered that the development remains acceptable on traffic planning grounds.

It should be noted that the assessment methodology employed for Stages 1 and 2 based on tenant operational information generates a higher trip generation rate that if the RMS trip generation rates were applied to the two Stages, consistent with the approach taken in the SSD-7500 assessment. As such the assessment undertaken in the TIA represents a worse case scenario without unacceptable impacts.

### Car Parking

Development approval SSD-7500 provided a car parking provision for the development that met the parking controls of the RMS guide. This approach was approved as initial forecasts estimated the warehouses would employ significantly fewer employees than the number of parking spaces that would be required under the CDCP 2015 rate. Notwithstanding this, additional areas within the site were allocated for future car parking on the site in the event that future occupiers of the warehouses had a greater demand (as per SSD-7500 consent condition B4). This future car parking, in conjunction with the proposed car parking, satisfied the CDCP 2015 parking requirement.

Now that operational information is known in relation to the prospective tenants for Stages 1 and 2, the TIA undertakes an updated parking assessment for the proposed modification. This assessment takes into account the operating hours and shift times for Stages 1 and 2, Journey to Work data in relation to modal split and expected visitor demand. **Table 10** below provides a summary of the proposed parking provision. For Stages 3 and 4, the car parking calculation methodology approved under SSD-7500 has been applied, being the application of the RMS Guide rate, with the balance of provision required to satisfy the Council DCP rate allocated as future car parking.

Table 10 Proposed Parking Provision

Stage	Parking Requirement (Tenant)	Parking Requirement RMS (DCP)	Provision
Stage 1	77	38 (+21)	77
Stage 2	117	44 (+22)	117
Stage 3	N/A	128 (+39)	128 (+39)
Stage 4	N/A	183 (+48)	183 (+48)
Future car parking to meet DCP requirement		393 (+130)	(87 future spaces)
<b>Total</b>		<b>523</b>	<b>505 (+87)</b>

Source: Ason Group

As per the existing consent, an additional provisional 80 car parking spaces are allowed for within the outdoor storage area to the east of Culverston Road. This allows for any other future car parking requirements in relation to the outdoor storage.

In accordance with CDCP 2015 accessible parking is to be provided in accordance with the Disability (Access to Premises – Buildings) Standards 2010, Building Code of Australia. Accessible parking for industrial developments is to be provided at a rate of 1 space for every 100 car parking spaces or part thereof.

Accordingly, the required parking based on the above rates are summarised in **Table 11**.

Table 11 Accessible Parking Provision

Stage	Parking Provision	Accessible Parking Requirement	Accessible Parking Provision
Stage 1	77	1	1
Stage 2	117	2	2
Stage 3	128 (+39)	2	2
Stage 4	183 (+48)	3	3
<b>Total</b>		<b>8</b>	<b>8</b>

Source: Ason Group

### Bicycle Parking

SSD-7500 consent Condition B6 requires a bicycle parking provision in accordance with the Planning Guidelines for Walking and Cycling (December 2004). This requires bicycle parking for industrial uses to be provided for 3-5% of the staff population and 5-10% of the customer/ visitor population.

Based on the proposed uses of the warehouses, the visitor demand is expected to be minimal to none, with any visitors likely to arrive via car. As set out in the TIA, based on the expected peak number of staff on site for Stages 1 and 2, a provision of three and four bicycle parking spaces are to be provided respectively.

It is expected that a similar level of provision will be provided for Stages 3 and 4, when further information is known about staff numbers for these warehouse uses. Further to the above, end of trip facilities (EOTF) are to be provided in line with the requirements of the Planning Guidelines for Walking and Cycling, as per SSD-7500 Condition B6.

### 6.1.1.3. Mitigation Measures

Based on the above assessment, it is not considered that any additional mitigation measures other than those approved under SSD-7500, including the requirements of the conditions of consent, are required.

## 6.1.2. Built Form, Landscaping and Visual Impacts

### 6.1.2.1. Existing Environment

The site is located within an existing industrial area and comprises hardstand and a number of detached buildings in relation to the vehicle storage use on site. Most of the site is used for vehicle storage with hail protection structures. The local area is characterised by large warehouse/industrial developments.

### 6.1.2.2. Potential Impacts

#### Built Form and Landscaping

The layout and design of the proposed modification has been carefully considered to provide a positive visual outcome and efficient use of the site with corresponding positive implications for views toward the site and future operations. The proposed modification to Stages 1 and 2 of the logistics hub have been carefully designed to be both functional and attractive in the local context. The approved site setbacks and landscaping will remain as approved and the modifications have been design to minimise the visual impact on the surrounding area. The design incorporates high quality materials and fencing has been carefully designed to have an acceptable impact on the streetscape. The proposed modifications will not have any material impact on the closest residential properties.

The reduced size warehouses and proposed outdoor storage areas in Stages 1 and 2 have been carefully designed and sited to make the most efficient use of space on site as well as providing suitable access for heavy service vehicles. The Stage 2 warehouse has been sited closer to the Stage 1 warehouse to allow for a regular shaped warehouse to be developed and make better use of the irregular shaped part of the site towards Airds Road for vehicular circulation. This also allows separate vehicle access routes for Stages 1 and 2 to ensure vehicle circulation through the site is optimised. The outdoor storage areas are located at the rear of the warehouses to allow safe entrance to the warehouse and offices by vehicles and pedestrians without having to cross the storage area first.

The built form within Stages 1 and 2 as proposed is further setback from the street frontages with Airds Road. The outdoor storage areas front the secondary street boundary of Airds Road. The outdoor storage areas will be adequately screened from public view with a 7.5 metre deep landscaped buffer including existing trees and proposed planting. As such the visual impacts of the outdoor storage on the streetscape will be minimised. Further, the site boundary is setback a considerable distance from the road reserve of Airds Road – between 18 and 58.5 metres. The outdoor storage area will be a minimum of 25.5 metres from the street to the north to Airds Road, and up to a maximum of 77.8 metres from the street to the west to Airds Road. The location of and screening to the Stage 1 and 2 outdoor storage areas has been sited to effectively screen the storage areas from the public domain.

The site coverage, setbacks and proposed landscaping, combined with the height, scale and architectural design of the buildings, will provide a suitable development outcome for the site that is commensurate with the industrial character of the area and considerate of views from the public domain and surrounding sites. Landscaping within the setbacks will soften the appearance of built form and hardstand and reduce the perceived bulk and scale of the development. Landscaping will also screen outdoor storage areas reducing the visual impact on the streetscape and surrounding areas.

The design of the proposed warehouse and distribution facilities encapsulates high commercial and industrial standards by virtue of various configurations and colour which respond to the industrial character of the precinct. The main warehouse walls have been designed to present an articulated form to the public roads where visible. The application of various tones and cladding seeks to alleviate the bulk and scale of the built form making a positive contribution to the streetscape. The colour scheme makes use of tonal blues and greys, responding to the local context.

#### Visual Impact

A Visual Impact Assessment (VIA) of the proposed development has been prepared by Urbis and is provided at **Appendix J**. The VIA analyses the likely visual effects of the built form proposed by the modification on public domain views in comparison to the approved development (SSD-7500). As outlined in the VIA, the surrounding visual context is summarised as follows:

- The wider visual context of Minto west of the site, is predominantly industrial, characterised by large bulky warehouse development but to the east is characterised by low scale and density residential development. Directly opposite the western edge of the site between Airds Road and Campbelltown Road are large material storage and distribution facilities, which include bulky industrial structures and associated offices.
- To the south of the site beyond Rose Payten Drive is a large hardstand commuter carpark which services the Leumeah Train Station, and to the south-east is the Campbelltown Sports Stadium and Athletics Centre.
- The area north of the site is characterised by large industrial warehouse forms such as storage facilities and distribution centres. The Southern Railway which is parallel to the eastern site boundary is predominately characterised by large bulky warehouse forms.
- Public open spaces within the visual context of the site include Rose Payten Reserve, Jackson Park and Kanbyugal Reserve to the west and Bellevue Park, Ernest Walsh Reserve and Leumeah Reserve to the east.

As identified in the VIA, the visual catchment of the site is predominately restricted to the closest locations and adjacent roads including Airds Road to the west and north, and Rose Payten Drive. Built form amendments proposed in the modification in terms of the reduced size of the Stage 1 and 2 warehouses and the additional floorspace for the Stage 3 warehouse are likely to be visible from the north-western bend of Airds Road at the intersection of Swaffham Road, development along the western side of Airds Road, and development on the northern side of Airds Road and 1 Culverston Road to the north-east. Residential development and public open spaces are separated from the subject site by industrial development, Campbelltown Road and the Southern Railway. Industrial built forms blocks and restricts visibility to the site from the west, north and east and in this regard the potential private domain visual catchment of the site is small.

Potential views that are available towards the site which may be effected by the proposed modification include:

- Close views from the intersection of Rose Payten Drive and Airds Road;
- Views east from development opposite the site on the western side of Airds Road;
- Views to the south-east from the intersection of Airds Road and Swaffham Road towards the north-west corner of the site; and
- Views west from Culverston Road towards the development on the western boundary of the site.

Photomontages from four view points were prepared as part of the VIA (**Figure 9**). These views represent a range of view points from which the development may have a visual effect or impact. The existing and proposed views from the closest viewpoints on Airds Road (VP2 and VP3) are included in **Figure 10** and **Figure 11**. The landscaping shown in the photomontages is representative of the existing landscaping to be retained. Additional landscaping to be planted as per SSD-7500 is predominantly not shown in the photomontages. As such, the actual landscaping/planting that will be visible on completion of the development will be greater than that shown in the photomontages. In this regard, the level of screening provided will be greater than that represented for the purposes of the VIA.

Figure 9 Photomontage view location map



Source: Urbis

Figure 10 VIA Viewpoint 02



Existing view to north-eastern corner of site from Airds Road



Proposed view to north-eastern corner of site from Airds Road with approved built form outline

Figure 11 VIA Viewpoint 03



Existing view to north-west corner of site



Proposed view to north-west corner of site with approved built form outline

The assessment of the photomontages of the approved development and proposed modification undertaken in the VIA finds that in the views where the proposed modification would be most visible, most of the proposed storage areas are effectively screened by the existing mature and proposed vegetation. Narrow horizontal bands of storage which may be visible from time to time, which will be seen against a backdrop of industrial built form and will not make any significant contribution to the view composition.

Visual effects of the modified proposal from the west from Airds Road are low and also largely screened by existing and proposed vegetation. Potential views from close locations would be visible for short time periods and from moving viewing situations in some views from the road carriageway. The minor amount of built form proposed and outdoor storage areas as modelled in all views, does not generate any significant visual effects in views or impacts on those view compositions.

The minor amount of additional built form proposed in the modification and outdoor storage does not create any significant additional visual effects or impacts compared to the approved development. Overall, the VIA finds that, based on the analysis of the representative views modelled, the level of visual effects and potential visual impacts as a result of the proposed modification would be negligible and acceptable, being of minimal environmental impact.

### 6.1.2.3. Mitigation Measures

Potential visual impacts are successfully mitigated by retention of mature boundary planting and additional planting as approved, with a 7.5 metre deep landscaped setback. Visual screening will be provided upon commencement of the development through the selection of large pot sizes for the new trees to be planted within the boundary setback. The proposed shrubs will grow to between 2-5 metres at maturity, complementing and supplementing the growth of the new trees.

## 6.1.3. Noise and Vibration

### 6.1.3.1. Existing Environment

The site is located within proximity to Campbelltown Road and the Hume Highway which are to the west of the site, both of which carry high traffic volumes including public transport buses and heavy vehicles. The site is located within an area which is classified as an Urban area as defined in EPA's Noise Policy for Industry and includes the following:

- Has through-traffic with characteristically heavy and continuous traffic flows during peak periods.
- Is near commercial districts or industrial districts

The nearest residential communities to the site are in Woodbine, located approximately 300m to the west and in Leumeah / Minto, approximately 500 m to the east. The noise environment is generally controlled by noise emissions from road traffic on the surrounding road network.

In terms of surrounding receivers, there are two noise environments to be characterised:

- Residential receivers in Woodbine – separated from the industrial area by Campbelltown Road.

- Residential receivers in Leumeah/Minto – separated from the industrial area by Pembroke Road.

### 6.1.3.2. Potential Impacts

An Acoustic Assessment (AA) has been prepared by Pulse White Noise Acoustics and is provided at **Appendix K**. The AA undertakes a review of the Noise and Vibration Impact Assessment approved as part of SSD-7500 and an assessment of the operational noise impacts of the proposed modification. The AA includes an assessment of the potential noise emissions from the use of the proposed outdoor storage areas in Stages 1 and 2 including:

- The movement of large reticulated trucks on the hardstand area including reversing alarms;
- Use of a truck horn; and
- Movements of forklifts and material movements on the storage areas.

The assessment assumes all movements on the external storage areas are possible during a day, evening or night-time period, with the operational conceptions of the storage areas assessed for the possible maximum noise level events during night time periods.

Based on the results of the assessment, the AA finds that the SSD-7500 Noise and Vibration Impact Assessment includes a suitable acoustic assessment which remains relevant for the proposed modifications to the development, including noise emission criteria for the site and would be included in the criteria for the site. The proposed external operations associated with the hardstand and storage areas within Stages 1 and 2, including use during night time hours, will result in maximum noise levels at surrounding receivers which will be acoustically acceptable.

### 6.1.3.3. Mitigation Measures

Based on the above assessment, it is not considered that any additional mitigation measures other than those approved under SSD-7500, including the requirements of the conditions of consent, are required.

## 6.1.4. Flooding and Stormwater

### 6.1.4.1. Existing Environment

The land use on the site is currently industrial and a fully developed and paved vehicle storage facility. Formal drainage systems and dedicated pipe drainage outlets to Bow Bowing Creek and Culverston Road exist. There are three outlets available for Stage 1, 2 and 3 of the development to Bow Bowing Creek and a further three available to Culverston Road. Watercourses are adjacent on the site consisting of engineered channels as part of trunk drainage infrastructure for the Minto industrial precinct. The site falls from the north and north-west to the east and south-east corner of the site. The highest level on the site, at RL 56.65m AHD, is located at the south-east corner of the site and the lowest level is RL 46.0m AHD at the north-west corner. The grades over the site are in the order of 1-2%.

The site is affected by the 1% AEP flood event. As approved under SSD-7500, the site is proposed to be filled above the 1% AEP flood level mitigating any adverse flood impacts

### 6.1.4.2. Potential Impacts

A Civil Engineering Report has been prepared by Costin Roe and is attached as **Appendix F**. The Civil Engineering Report considers potential impacts as a result of the proposed modification in relation to erosion and sediment control, stormwater management, stormwater quality management, flooding and soil and water management.

In relation to erosion and sediment control, the overall strategy for erosion and sediment control for the development remains consistent with that approved under SSD-7500. The Civil Engineering Report sets out an erosion and sediment control program adjusted to suit the layout of the development as proposed by the modification.

In relation to stormwater management, the proposed stormwater management strategy remains consistent with the approved arrangement. The Civil Engineering Report includes a revised drainage layout to reflect the proposed amendments to the development. Development catchment breakdown and discharge locations remains consistent with those approved, as does the proposed water quality management strategy and water quantity requirements.

In relation to flood management, the Civil Engineering Report confirms that the proposed floor levels as modified meet the flood planning requirements of floor levels higher than the 1% AEP flood level plus 0.5m of freeboard, and that there are no changes to the approved flood impacts or flood behaviour at the site.

In relation to water balance, the Civil Engineering Report identifies some minor variance in the water balance approved under SSD-7500 would result due to the reduced overall floor area as proposed by the modification. The reduced floor area would result in a minor reduction in potable water demand and also wastewater generation, resulting in an overall reduction in potential impacts in comparison to the approved development. Given the similar and slightly improved outcomes relating to water balance assessments, the Civil Engineering Report finds no further assessment of impacts is required in support of the modification.

#### **6.1.4.3. Mitigation Measures**

As set out in the Civil Engineering Report (**Appendix F**), the following mitigation measures are proposed, consistent with those already approved under SSD-7500:

- During the construction phase of the development, an Erosion and Sediment Control Plan will be implemented to minimise water quality impacts.
- Stormwater Management Strategy consistent with the approved SSD-7500 arrangement however the revised Masterplan Layout requires modification to the internal layout to suit the specific tenant layouts and requirements.
- During operational phase the stormwater quality will be performed by a treatment train approach of primary treatment of hardstand and other paved surfaces.

### **6.1.5. Contamination**

#### **6.1.5.1. Existing Environment**

Bulk earthworks and demolition associated with the proposed development have the potential to expose construction workers and future users to hydrocarbon impacted soil and groundwater identified on-site associated with previous uses on the site from three existing underground storage tanks (UST) (diesel, kerosene and unleaded petrol) and a stockpile.

A Phase I and Limited Phase II Environmental Site Assessment were undertaken as part of SSD-7500. The Phase 2 Assessment identified ground contamination located at the site of warehouse 1D. As such, a detailed Phase II environmental Site Assessment was conducted on the central precinct of the site which found that a Remediation Action Plan for the warehouse 1D site area would be required.

This Remediation Action Plan was prepared and approved under SSD-7500 and is required to be implemented prior to the commencement of construction of warehouse 1D by condition of consent B34.

#### **6.1.5.2. Potential Impacts**

A Contamination and Remediation Technical Note has been prepared by Golder Associates and is attached as **Appendix H**. This technical note reviews the existing environmental site assessments undertaken for the site in relation to the approved development as well as the SSD-7500 conditions of consent, in relation to the proposed modification.

In relation to the proposed modifications to Stages 1, 2 and 3 at the site, the technical note finds that the known contamination source at the site is unlikely to present a risk during construction activities associated with Stages 1, 2 or 4. As such, the contamination impacts remain as approved in relation to the requirement for the construction of Stage 3 to be undertaken in accordance with the Remediation Action Plan.

#### **6.1.5.3. Mitigation Measures**

The contamination and remediation mitigation measures approved under SSD-7500 remain adequate and applicable to the development as proposed to be modified.

## **6.2. MINOR ASSESSMENT IMPACTS**

The following table summarises the matters which required a minor assessment in the Modification Report.

Table 12 Minor Assessment Impacts

Issue	Findings	Mitigation Measures
Air Quality	As per the approved development, air emissions may result from construction (including demolition, vegetation clearing, bulk earthworks and site preparation) and during operation (light and heavy vehicle movements). In accordance with the SSD approval, it is considered that the risk of adverse air quality impacts from construction and operation of the development is low.	As per SSD-7500 including minimising site disturbance, keeping exposed surfaces wet, stabilising/revegetation disturbed areas, notifying nearby sensitive receivers and ensuring trucks are covered, as well as compliance with the conditions of consent including preparation and submission of a CEMP.
Infrastructure Requirements	The proposed modification will not result in any greater infrastructure servicing requirements than approved. As per SSD-7500 any upgrades required to services will be capable of being serviced for the proposed development.	No further mitigation measures required other than those outlined in SSD-7500 conditions of consent.
Greenhouse Gas and Energy Efficiency	The proposed development will not have any greater impact in relation to greenhouse gas and energy efficiency. The assessment of the approved development remains consistent with the proposed modification.	No further mitigation measures required other than those approved including the Sustainability Management Plan which identifies a number of different ecological sustainability initiatives for construction and operational phases.
Ecologically Sustainable Development	The proposed modification remains ecologically sustainable development as per the approved development. The proposed modification will not result in any materially different impact.	No further mitigation measures required other than those approved.
Waste	In accordance with the approval, waste in relation to the proposed modification will be adequately managed during construction and operational phases. The proposed modification will not	No further mitigation measures required other than those approved including the waste management measures, CEMP and OEMP.

Issue	Findings	Mitigation Measures
	result in any material changes to waste management at the site.	
Contributions	As per the SSD approval, any contributions as a result of the proposed modification will be in accordance with the relevant Council requirements.	N/A
Mineral Resources	In accordance with the approval, the proposed modification will not impact on any mineral resources. The proposed modification does not have a material impact on the existing assessment.	As per SSD-7500 including mitigation measures to be implemented during bulk earthworks and construction phases.

# 7. JUSTIFICATION OF MODIFIED PROJECT

This section of the report provides a comprehensive evaluation of the modified proposal 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 modifications, 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 proposed modification has been carefully considered to ensure any potential impacts of the development are minimised. The proposed modification seeks to meet the objectives of the project through enabling industrial uses and employment opportunities to be delivered on site. The proposed modifications are in response to current market demand and tenant requirements which reflect the modernisation of traditional warehousing and distribution uses and the incorporation of the latest technology. The alternative considered in relation to retaining the development as approved would significantly delay the delivery of employment opportunities on site and the associated investment in the local and regional economy as the approved design does not currently meet tenant demand.

The proposed modification results in relatively minor amendments to the built form and layout on site. The proposed layout has been developed to maximise the efficiency and operational benefit of the site, in the context of the approved industrial uses at the site. The proposal is consistent with the approved warehousing and distribution uses and operational parameters at the site. The design of the amended warehouses has been carefully considered to respond to the local context and minimise any potential impacts on the streetscape. The built form in Stages 1 and 2 will now be setback further from the public domain and the proposed outdoor storage areas will be adequately screened by existing and proposed landscaping, including trees and shrubs which will provide for screening upon commencement and maturity.

## 7.2. STRATEGIC CONTEXT

The development as modified is entirely consistent with the strategic context including *A Metropolis of Three Cities*, *Western City District Plan*, and *Campbelltown Local Strategic Planning Statement*.

The proposal will deliver modern warehousing and distribution uses within an allocated industrial area, that is strategically located to the regional road and freight network. The site is highly suitable for industrial use being designated IN1 General Industrial, highly accessible to the transport network, compatible with the surround development and local context of existing industrial uses, whilst having minimal impact on the environment.

The development, incorporating the proposed and approved mitigation measures where required, will not have any harmful impacts on the natural or built environment including any key features of value. The proposal will provide significant economic benefit including construction and operational employment opportunities in a location highly accessible to the local community, bringing new additional investment to Campbelltown as well as the wider region.

## 7.3. STATUTORY CONTEXT

The proposed development has been assessed in accordance with the relevant matters for consideration listed in Section 4.15 of the EP&A Act.

### 7.3.1. Environmental Planning Instruments

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

- SEPP 55 – Remediation of Land
- SEPP 64 – Advertising Structures and Signage
- Campbelltown Local Environmental Plan 2015.

### 7.3.2. Draft Environmental Planning Instruments

No draft environmental planning instruments are relevant to the modified proposal.

### 7.3.3. Development Control Plan

Campbelltown Development Control Plan 2015 (the DCP) provides detailed planning controls which are relevant to the site and surrounding locality. However, clause 11 of the SRD SEPP states that DCPs do not apply to State significant development.

Where relevant, the DCP controls have been addressed on a merit basis in **Section 6** of the Modification Report so the proposed development is compatible and consistent with the existing, approved and likely future development in the locality, including relevant technical requirements (eg public domain, stormwater, etc).

### 7.3.4. Planning Agreement

No planning agreements are relevant to the modified proposal.

### 7.3.5. Regulations

This application has been prepared in accordance with the relevant provisions of the EP&A Regulation.

### 7.3.6. Likely Impacts of the Proposal

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

- **Natural Environment:** the proposed modifications address the principles of ecologically sustainable development (ESD) in accordance with the requirements of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation) and as outlined below:
  - Precautionary principle: the precautionary principle relates to uncertainty around potential environmental impacts and where a threat of serious or irreversible environmental damage exists, lack of scientific certainty should not be a reason for preventing measures to prevent environmental degradation. The development as modified will not result in any threat of serious environmental damage or degradation.
  - Intergenerational equity: the needs of future generations are considered in decision making and that environmental values are maintained or improved for the benefit of future generations. The development represents sustainable development, making best use of a brownfield site in an accessible location. The development will not have any unacceptable impacts on the environment.
  - Conservation of biological diversity and ecological integrity: The development as modified will not have any unacceptable impacts on the conservation of biological diversity and ecological integrity. The proposal retains existing trees on site where possible and includes landscaped setbacks to all site boundaries 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 as modified will be consistent with those of the approved development and managed accordingly by the proposed mitigation measures as required.
  - Overall, the development as modified will not have any unacceptable impacts on the natural environment. The approved Sustainability Management Plan for the development identifies a number of different ecological sustainability initiatives including energy savings, energy efficiency and waste minimisation.
- **Built Environment:** the proposed modifications have been assessed in relation to the following built environment impacts:

### Traffic Impacts

As set out in **Section 6** and the TIA at **Appendix I**, the development as modified will have a reduced daily trip generation. Although the trip generation at the AM and PM peaks will be increased, these vehicle movements can be satisfactorily accommodated within the local road network. As such the traffic impacts of the proposal are considered to be acceptable.

### Visual Impact

As set out in **Section 6** and the VIA at **Appendix J**, the development as modified will have a negligible impact on visual effects or views impacts and be of minimal environmental impact.

The 7.5 metre deep landscape buffer comprised of existing mature and proposed planting is proposed to screen the proposed outdoor storage areas within Stages 1 and 2 to mitigate any potential impacts of the outdoor storage on the streetscape or public domain. Tree and shrub species have been selected to provide visual screening with complementary heights at commencement and maturity.

The built form within Stages 1 and 2 is now proposed to be setback further from the street and any views of the warehouse buildings present as narrow horizontal bands which may be visible in some views of the site above the landscape buffer to the boundary. Views of the site will predominantly be in motion from vehicles on the road.

As such, the visual impacts of the proposal are considered to be acceptable.

### Noise Impacts

As set out in **Section 6** and the Acoustic Assessment at **Appendix K**, the development as modified will not have any unacceptable impacts on local noise sensitive receivers. Any noise impacts of the development will be within the acceptable noise limits approved at the site under SSD-7500. As such, the noise impacts of the proposal are considered to be acceptable.

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

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

## **7.3.7. Suitability of the Site**

The site is considered highly suitable for the modified proposal for the following reasons:

- The warehouse and distribution centre use is permissible within the IN1 zone and in accordance with the zone objectives including to provide a wide range of industrial and warehouse land uses; to encourage employment opportunities; and to minimise any adverse effect of industry on other land uses.
- The development is compliant with the CLEP 2015 and substantially compliant with the CDCP 2015 including in relation to acoustic amenity, built form and setbacks, car parking and landscaping.
- The site is located within an existing industrial area and the character and scale of the development is in keeping with the site's context.
- 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.

## **7.3.8. Submissions**

It is acknowledged that submissions arising from the public notification of this application will need to be assessed by Council.

### 7.3.9. Public Interest

The development as proposed to be modified is considered in the public interest for the following reasons:

- The proposal is consistent with relevant State and local strategic plans and substantially complies with the relevant State and local planning controls.
- No adverse environmental, social or economic impacts will result from the proposal.
- The proposal will provide up to 300 jobs during the construction phase, and 300 to 400 jobs once complete and fully operational. The proposal will stimulate local investment and contribute significant economic output and value add to the economy each year. This project is fully funded and 'shovel ready' for commencement of construction as soon as possible next year.
- Subject to the various mitigation measures recommended by the specialist consultants, no adverse, social or economic impacts will result from the proposal in terms of traffic, noise and vibration, air quality and odour or views during construction and ongoing operation of the facility. Based on the assessment of noise, air quality and traffic, the proposal will not result in any adverse cumulative impacts.
- The issues identified during the stakeholder engagement have been addressed through the assessment of the impacts of the modified project.

## 7.4. SUMMARY AND CONCLUSION

This Modification Report has assessed the environmental, social and economic impacts of the proposed modifications in accordance with the relevant requirements of the EP&A Act 1979.

Having regard for the biophysical, economic and social considerations, including the principles of ecologically sustainable development, the proposed development is justified for the following reasons:

- The development as modified accords with the applicable statutory requirements and is entirely consistent with the strategic planning policy objectives including *A Metropolis of Three Cities*, *Western City District Plan*, and *Campbelltown Local Strategic Planning Statement*. The proposal will deliver modern warehousing and distribution uses within an allocated industrial area, that is strategically located to the regional road and freight network.
- The assessment undertaken has found that the development will result in minimal environmental and amenity impacts during construction and operation of the development, including traffic, contamination and remediation, visual and noise impacts, subject the implementation of the proposed mitigation measures and SSD conditions of consent.
- The site is highly suitable for industrial use being designated IN1 General Industrial, highly accessible to the transport network, compatible with the surround development and local context of existing industrial uses, whilst having minimal impact on the environment.
- Engagement with stakeholders informed the development and design of the project, including proposed mitigation measures.
- On balance, the impacts and benefits of the proposal favour the public interest.

Having considered all relevant matters, we conclude the development as proposed to be modified is appropriate for the site and approval is recommended.

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# STATUTORY COMPLIANCE TABLE

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# CONTAMINATION & REMEDIATION TECHINICAL NOTE



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# VIEW IMPACT ASSESSMENT

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