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URBIS

5 & 9 CULVERSTON ROAD, MINTO

Modification Report

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| Report Number | 01 |

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EXECUTIVE SUMMARY

This Modification Report has been prepared on behalf of Charter Hall Holdings Pty Ltd (**Charter Hall**) in support of an application to modify development consent SSD-7500 Modification 1 (**MOD1**) 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 112,000m² of gross floor area (**GFA**) including four warehouse buildings for warehousing and distribution uses, with ancillary offices.

On 15 December 2021, Modification 1 to SSD-7500 was approved by the Minister for Planning under delegation. The proposal sought changes to the plans and conditions associated with SSD-7500. Amendments were sought to the layout of 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 approved staging is described below:

- Stage 1: 9,078m² of warehousing GFA and 300m² of office GFA
- Stage 2: 9,500m² of warehousing GFA and 500m² of office GFA
- Stage 3: 31,000m² of warehousing GFA and 1,000m² of office GFA
- Stage 4: 40,000m² of warehousing GFA and 2,000m² of office GFA

Since the approval of SSD-7500 MOD1, the future tenant has progressed the detailed design for the Stage 1 warehouse. This has resulted in minor modifications to the approved plans to meet their operational requirements. This modification application seeks consent for changes to the plans and conditions associated with SSD-7500 MOD1.

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:

- *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 in relation to Stage 1 of the development are summarised as follows:

- Relocation of the car park access point from Culverston Road north by 41.95 metres.
- Relocation of the warehouse westwards by 2 metres and the office eastwards by 2 metres (no change to warehouse or office GFA).
- Relocation of the retaining wall to the car park westwards by 0.5 metres.
- Extension of the western warehouse awning to the south by 9.6 metres.
- Adjustment of the warehouse roof pitch from 2.5 to 3 degrees (no change to overall building height).
- Inter-tenancy boundary fence specification amended to cyclone fencing.
- Repositioning of loading dock roller shutter doors on northern and western warehouse elevations.
- Relocation of the Stage 1 southern boundary north and the Stage 1 development north by 1.94 metres.
- Relocation of the Stage 1 northern boundary north by 1.94 metres and reduction of the width of the Stage 2 southern vehicle access driveway by 1.94 metres.

The proposed modifications are detailed in the Architectural Plans prepared by Watch This Space Design at **Appendix C**.

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. 55 – Remediation of Land*
- *State Environmental Planning Policy No. 64 – Advertising & Signage.*

Engagement

Stakeholder engagement has been undertaken by Urbis during the preparation of this report. This includes direct engagement and consultation with the Department of Planning and Environment.

The outcomes of the stakeholder engagement have been responded to in the proposed modification.

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, Access and Parking:** the proposed modification is acceptable on traffic, access and parking grounds with no adverse impacts to the external road network.
- **Built Form, Landscaping 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.

The approved mitigation measures have 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, Minto.

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 established 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 approved 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.
- 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 and Environment (**DPE**) on behalf of Charter Hall to modify SSD-7500 (as previously modified by MOD1) at 5 and 9 Culverston Road, Minto.

1.1. APPLICANT DETAILS

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

Table 1 Applicant Details

| Descriptor | Proponent Details |
|-------------------|---|
| Full Name(s) | Charter Hall Holdings Pty Ltd c/- Urbis |
| Postal Address | Level 8, 123 Pitt Street, Sydney 2000 |
| ABN | 50 105 256 228 |
| Nominated Contact | Holly Rhoades, Senior Consultant |

1.2. PROJECT BACKGROUND

1.2.1. Approved Development – SSD-7500

On 23 June 2017, a SSD Application was approved by the Minister for Planning under delegation for the *Construction, fit-out and operation of a warehouse and logistics hub with 112,000 m² of gross floor area (GFA) including:*

- *Four warehouse buildings for warehousing and distribution uses, with ancillary offices, comprised of:*
 - *Warehouse 1A: 40,000 m² of warehousing GFA and 2,000 m² of office GFA*
 - *Warehouse 1B: 22,000 m² of warehousing GFA and 1,000 m² of office GFA*
 - *Warehouse 1C: 22,000 m² of warehousing GFA and 1,000 m² of office GFA*
 - *Warehouse 1D: 23,000 m² of warehousing GFA and 1,000 m² 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**.

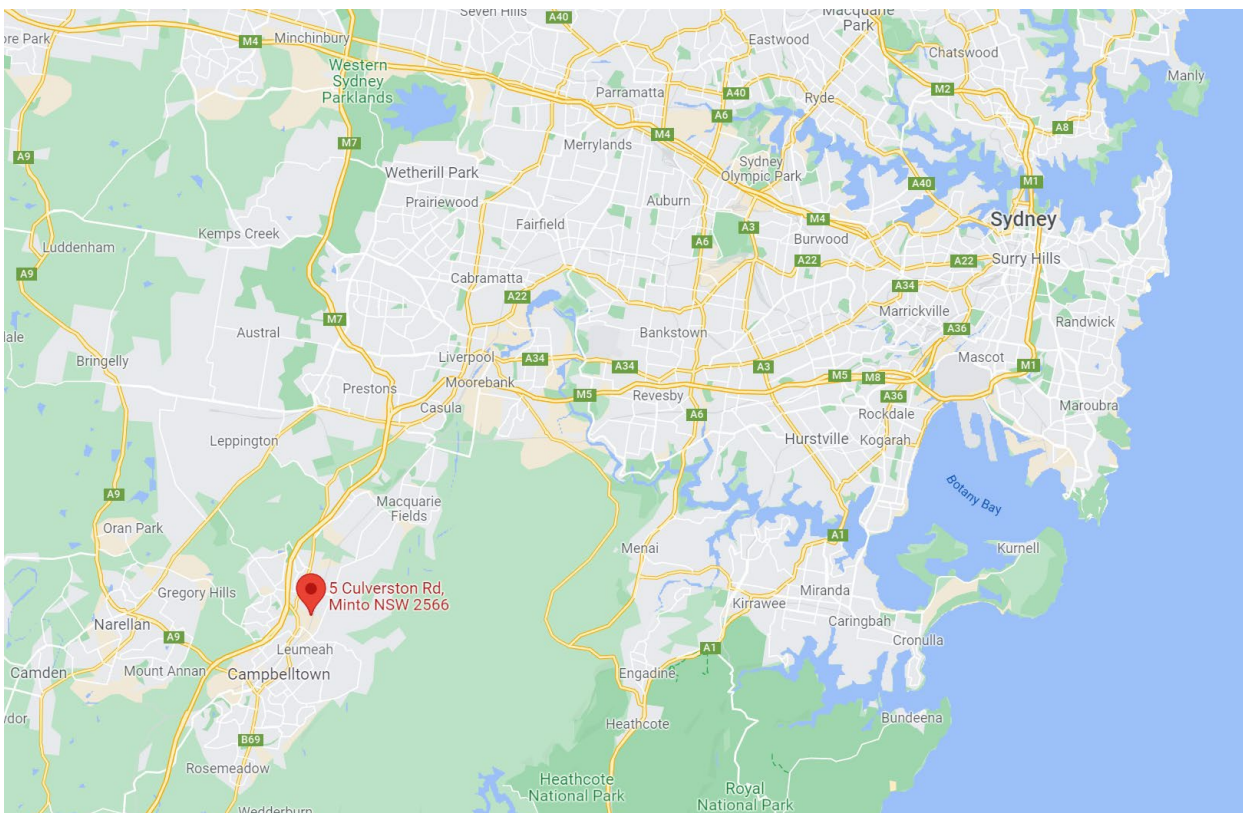
The development consent has been implemented through the completion of initial ground works and remediation. The approved warehouses are to be delivered in stages and in response to tenant demand.

Figure 1 Aerial view of site



Source: Urbis

Figure 2 Regional context



Source: Google Maps 2021

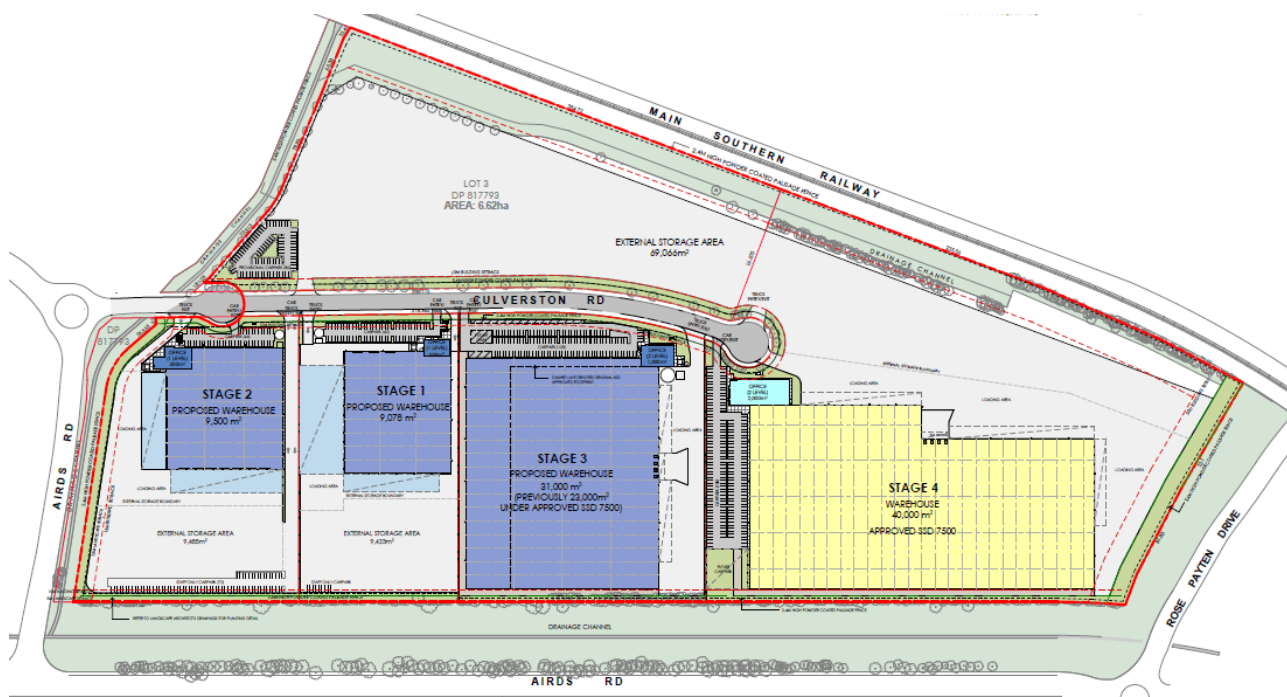
1.1.1. Approved Development – SSD-7500 MOD1

On 15 December 2021, Modification 1 to SSD-7500 was approved by the Minister for Planning under delegation. The proposal sought changes to the layout of Warehouses 1B, 1C and 1D and the staging of the development, to reflect incoming tenant requirements.

The approved staging is described below. The development layout is shown in **Figure 3**.

- Stage 1: 9,078m² of warehousing GFA and 300m² of office GFA
- Stage 2: 9,500m² of warehousing GFA and 500m² of office GFA
- Stage 3: 31,000m² of warehousing GFA and 1,000m² of office GFA
- Stage 4: 40,000m² of warehousing GFA and 2,000m² of office GFA

Figure 3 Approved site plan SSD-7500 MOD-1



Source: Watch This Space Design

1.3. PROPOSED MODIFICATIONS

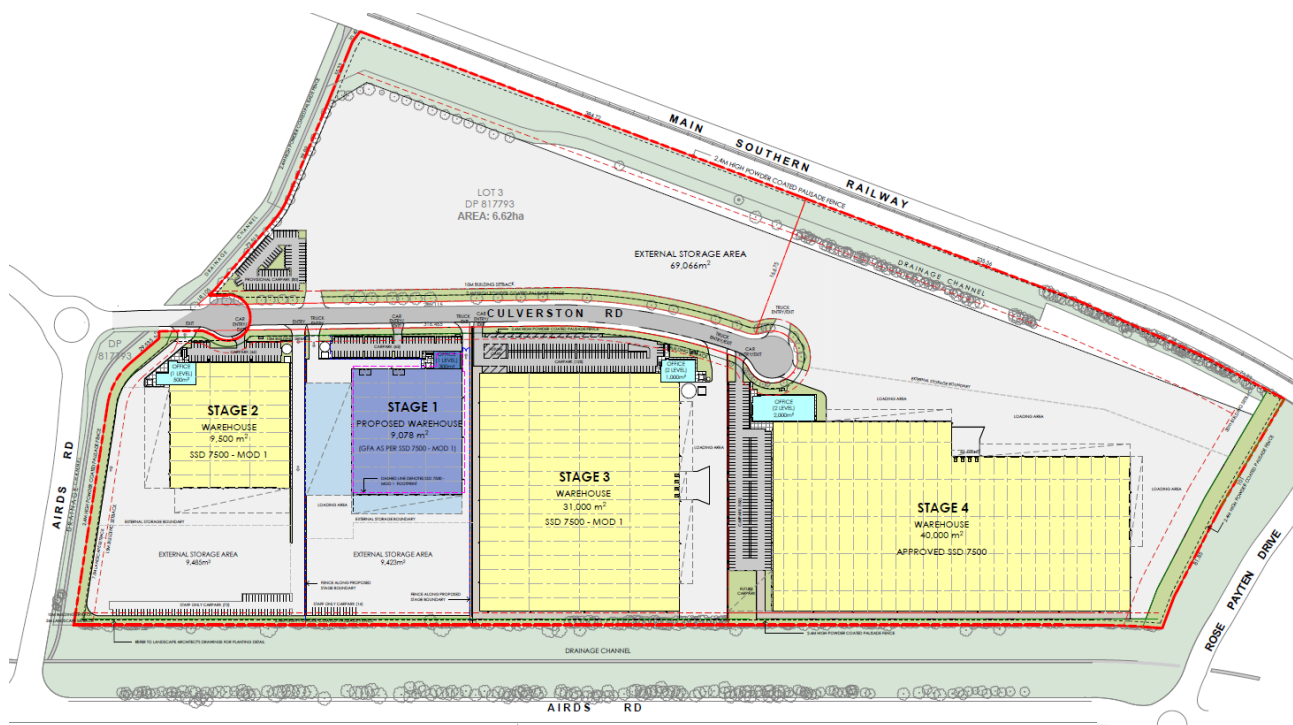
This Modification Application seeks changes to the plans and conditions associated with SSD-7500 MOD1. The future tenant of Stage 1 has progressed the detailed design for their warehouse and requires minor modifications to the approved plans including:

- Relocation of the car park access point from Culverston Road north by 41.95 metres.
- Relocation of the warehouse westwards by 2 metres and the office eastwards by 2 metres (no change to warehouse or office gross floor area).
- Relocation of the retaining wall to the car park westwards by 0.5 metres.
- Extension of the western warehouse awning to the south by 9.6 metres.
- Adjustment of the warehouse roof pitch from 2.5 to 3 degrees (no change to overall building height).
- Inter-tenancy boundary fence specification amended to cyclone fencing.
- Repositioning of loading dock roller shutter doors on northern and western warehouse elevations.

Minor modifications are also proposed to align the staging boundaries with the tenancy boundaries, including the ongoing activities to the south. This will require the southern boundary for Stage 1 to be 1.94 metres further north, also requiring the approved warehouse building and northern building in Stage 1 to move 1.94 metres to the north. The width of the southern vehicle access driveway in Stage 2 will be reduced by 1.94 metres to accommodate the amended boundaries. The proposed changes are shown in the plan extracts held as **Figure 4** and **Figure 5**.

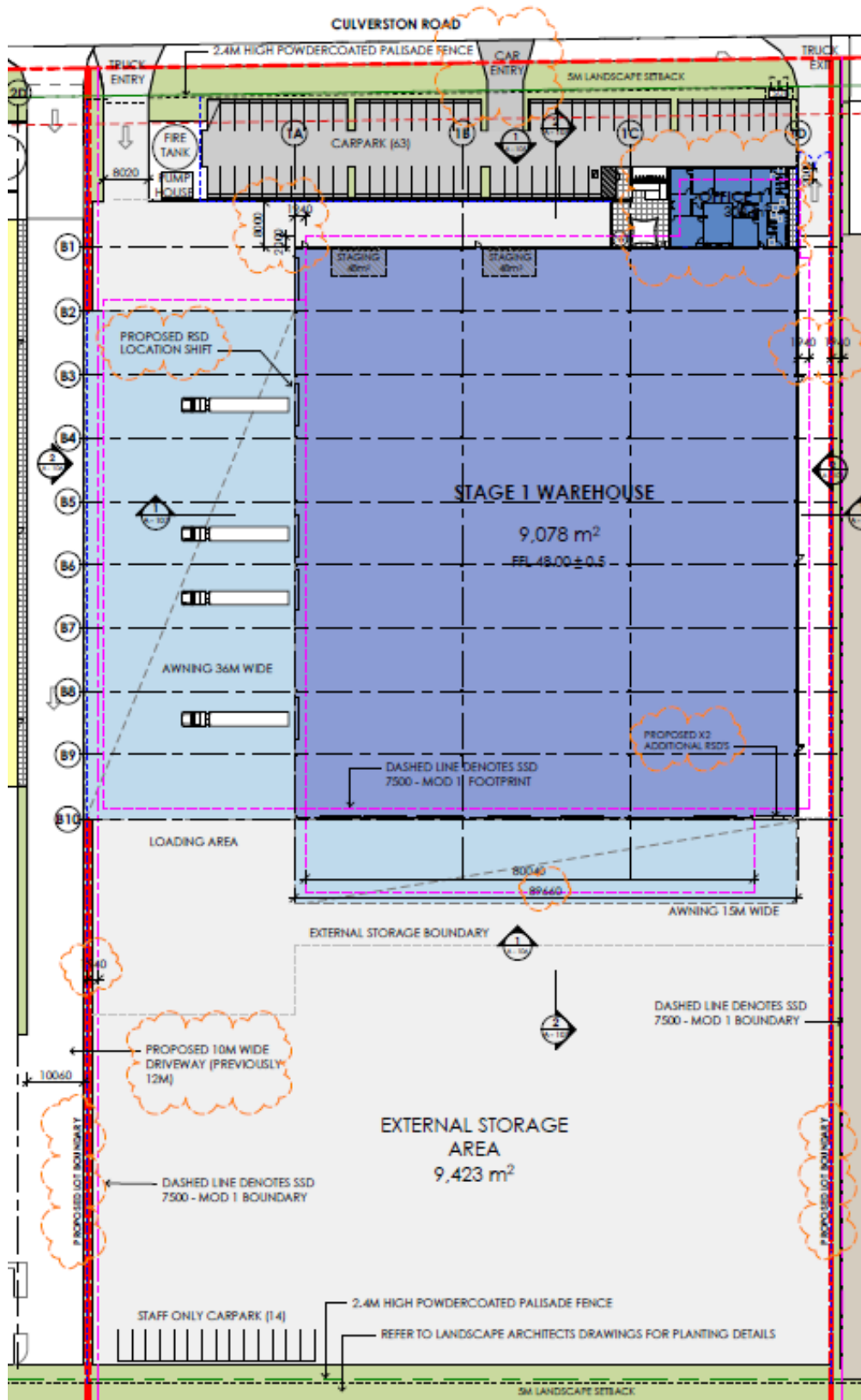
A correction is also proposed to be made to the approved car parking layout for Stage 1. SSD-7500 MOD1 approved 77 car parking spaces for the Stage 1 site, with 63 in the eastern car park and 14 spaces at the western boundary. Approved drawings 'A-04_C Site Masterplan – Stage 1, 2, 3 & 4' and 'A-101_D Stage 1 – Site Plan' incorrectly show 8 and 9 car parking spaces at the Stage 1 western boundary respectively. The proposed modified plans correct this to show 14 car parking spaces at the western boundary. This makes no change to the approved number of car parking spaces on site.

Figure 4 Proposed site plan



Source: Watch This Space Design

Figure 5 Proposed Stage 1 modification plan mark up



Source: Watch This Space Design

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

Table 2 Project Objectives

| Project Objective | Proposed Modification |
|---|--|
| Meet market demand and achieve viable economic return | The proposed modifications are required to meet the design and operational requirements of the Stage 1 tenant |
| Ensure minimal environmental and amenity impact | The proposed modification has been designed to ensure minimal environmental and amenity impact. Mitigation measures 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. |
| Ensure development is compatible with surrounding development and the local context | The proposed modification has been designed to be consistent with the approved design principles and is compatible with the surrounding development and local context. |

1.3.1. Analysis of Feasible Alternatives

Charter Hall identified three project alternatives which were considered in respect to the identified need for the development. Each of these options is listed and discussed in the following table.

Table 3 Project Alternatives

| Option | Assessment |
|--------------------|--|
| Do Nothing | The approved development could be delivered in accordance with the current SSD consent. However, this option was dismissed as the approved development does not meet the design and operational requirements of the tenant. Loss of the potential tenant would result in the loss of employment opportunities and the associated investment in the local and regional economy. |
| Alternative Design | The approved warehouse could have been reduced in size to avoid the changes to the northern boundary between Stages 1 and 2. However, the reduced size building would not meet the design and operational requirements of the Stage 1 tenant. Again, this would have resulted in the potential loss of the tenant and associated impacts on local employment and investment. |
| The Proposal | <p>The proposed modification to the development consent was identified as being the most suitable proposal as it facilitates the delivery of a warehouse and distribution centre in accordance with the incoming tenant requirements. The proposal enables commencement of the approved development and delivery of local employment and investment in accordance with the IN1 zone objectives. As the preferred option for the proposal, the site:</p> <ul style="list-style-type: none"> ▪ Allows for the development as a permissible use. ▪ Has appropriate access to the regional road network. |

| Option | Assessment |
|--------|---|
| | <ul style="list-style-type: none"> ▪ 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 1979**). Accordingly, this Modification Application is being lodged with DPE 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 |
|---|--|---|
| A Metropolis of Three Cities (Region Plan) | <p>Key objectives of the Plan relevant to the proposal are:</p> <ul style="list-style-type: none"> Objective 16 Freight and logistics network is competitive and efficient Objective 23 Industrial and urban services land is planned, retained and managed. | 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 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> <ul style="list-style-type: none"> Planning Priority W10 Maximising freight and logistics opportunities and planning and managing industrial and urban services land Planning Priority W11 Growing investment, business opportunities and jobs in strategic centres. | 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 tenant demand and will support the growth and enhancement of industrial land. |
| Campbelltown Local Strategic Planning Statement | <p>Key priorities of the LSPS relevant to the proposal are:</p> <ul style="list-style-type: none"> Priority 9 Building an Internationally Recognised Local Economy Priority 11 Striving for Increased Local Employment. | The modified proposal will contribute to the diversification and strengthening of the local economy. The modification will deliver operational industrial uses in a designated industrial area, strategically located to Campbelltown. The modified proposal responds to tenant 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 |

| Document | Relevance | Consistency |
|----------|-----------|--|
| | | 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 project description and relevant 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(1A) of the EP&A Act 1979.

3.1. OVERVIEW OF PROPOSAL

Minor modifications are proposed to accommodate the detailed design and operational requirements for the incoming tenant in Stage 1. It is also proposed to amend the staging boundaries to accommodate the existing lease arrangements and ongoing site operations to the south of the approved Stage 1 development.

The updated architectural plans prepared by Watch This Space Design are attached as **Appendix C**. 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 **Table 5** and is in accordance with the relevant criteria listed in the DPIE *State Significant Development Guidelines – preparing an environmental impact statement*.

Table 5 Modified Project Summary Table

| Element | Approved Project | Modified Project |
|-----------------------------------|--|------------------|
| <u>Project Area</u> | | |
| Site Area | 29.36 hectares (ha) | No change |
| Excavation Depth | Less than 1 metre | No change |
| <u>Physical Layout and Design</u> | | |
| Height of Building | Maximum of 13.7 metres | No change |
| Gross Floor Area | Warehouse GFA: 89,579m ² Office GFA: 3,800m ² | No change |
| External Storage Area | 8.8 hectares | No change |
| Parking Spaces | 505 car parking spaces including eight (8) accessible spaces 87 provisional car parking spaces | No change |
| Site Access | Via Culverston Road | No change |
| <u>Uses and Activities</u> | | |
| Land Use | Warehouse and distribution centre with ancillary office space | No change |
| Project Sequencing | Stage 1: 9,078m ² of warehousing GFA and 300m ² of office GFA Stage 2: 9,500m ² of warehousing GFA and 500m ² of office GFA | No change |

| Element | Approved Project | Modified Project |
|---------|---|------------------|
| | <p>Stage 3: 31,000m² of warehousing GFA and 1,000m² of office GFA</p> <p>Stage 4: 40,000m² of warehousing GFA and 2,000m² of office GFA</p> | |

Based on the above, the proposal is substantially the same development as originally granted consent and is lodged under section 4.55(1A) of the EP&A Act. 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.
- Four warehouse or distribution centre buildings will be delivered in stages, accessed from Culverston Road.
- The layout of the warehouse buildings and maximum building heights will remain unchanged, as will the outdoor storage areas.
- The hours of operation remain unchanged.
- Daily trip generation and car parking on site remains as approved.

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 Airs 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 Airs 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 Airs Road, measuring between 18 metres and 58.5 metres.

The site is a brownfield industrial site previously occupied by storage and logistics uses. 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 and warehouse buildings. Key site attributes are noted as follows:

- Extant development on the site comprises hardstand and warehouse buildings.
- The site is generally clear of vegetation, except for planting adjacent to the site boundaries.
- The topography is characterised by a gradual fall from the south-east to north-western corners of the site.
- Existing services including sewerage, electricity and water, are located across the site. Drainage systems are 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 provided via Culverston Road from the round-about intersection of Culverston Road and Airs Road.
- The eastern boundary adjoins a drainage corridor and the Main Southern Railway line while the site's western boundary adjoins the Bow Bowing Canal. The site's northern and southern boundaries also adjoin drainage channels.

The site is in an established industrial precinct, with surrounding land uses including warehousing, manufacturing, automotive and industrial operations. Nearby residential areas include the low-density residential suburbs of Woodside to the west, Leumeah and Minto to the east and south.

The development occupies most of the site area with a landscaped buffer to each frontage. The site does not contain any threatened species, ecological communities or habitats. The site is affected by 1% AEP flood event and accordingly, the approved development provides for filling above the 1% AEP flood level mitigating any adverse flood impacts.

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

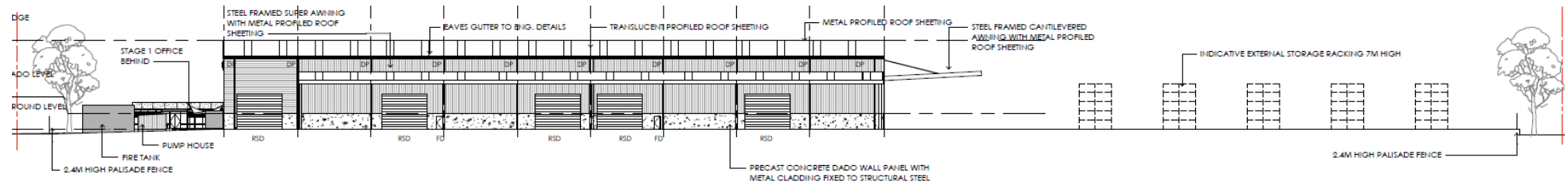
3.2.2. Physical Layout and Design

The proposed design amendments consider the existing site conditions and have been developed with regard to the functional requirements of the warehouse and distribution use. The proposed modification includes:

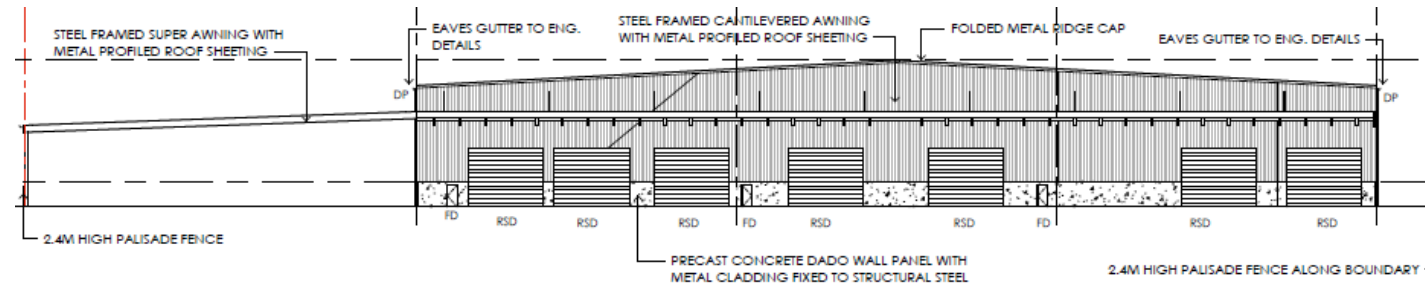
- Relocation of the Stage 1 car park access point from Culverston Road north by 41.95 metres.
- Relocation of the Stage 1 warehouse westwards by 2 metres and the office eastwards by 2 metres (no change to warehouse or office gross floor area).
- Relocation of the retaining wall to the Stage 1 car park westwards by 0.5 metres.
- Extension of the western Stage 1 warehouse awning to the south by 9.6 metres.
- Adjustment of the Stage 1 warehouse roof pitch from 2.5 to 3 degrees (no change to overall building height).
- Stage 1 inter-tenancy boundary fence specification amended to cyclone fencing.
- Repositioning of loading dock roller shutter doors on northern and western Stage 1 warehouse elevations.
- Relocation of the northern and southern boundaries and the approved warehouse building in Stage by 1.94 metres to the north.
- Reduction of the width of the Stage 2 southern vehicle access driveway by 1.94 metres.

The proposed modification does not make any change to the approved warehouse materials and finishes.

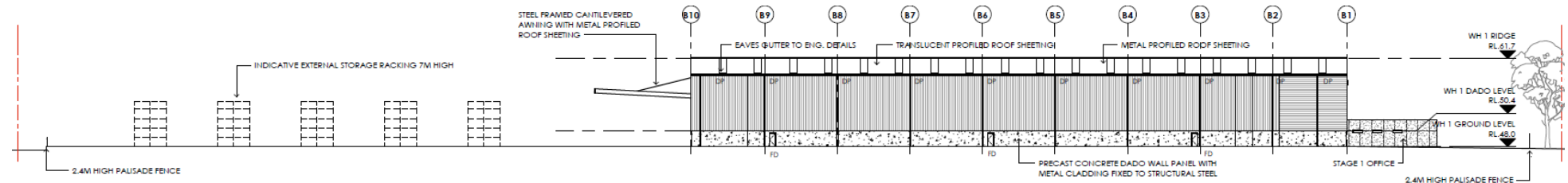
Figure 6 Proposed Stage 1 elevations



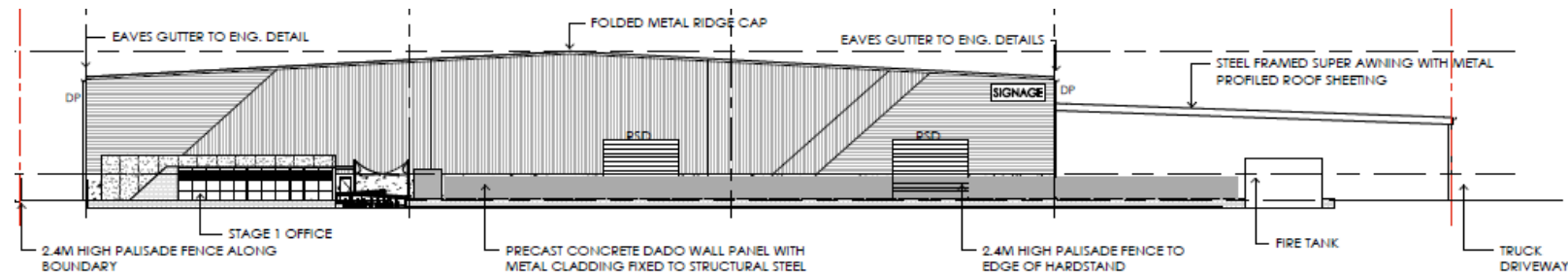
North elevation



West elevation



South elevation



East elevation

Source: Watch This Space Design

3.2.3. Uses and Activities

As per the SSD approval, the proposed modification makes no change to the warehouse and distribution centre use with ancillary office space. 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.

The proposed modification makes no change to the earthworks proposed at the site. The development includes bulk earthworks and the importation 231,400m³ of fill to create level building pads for the four warehouse buildings.

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.

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. 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

In accordance with the SSD approval, during operation all vehicles will access the site via Culverston Road. Vehicular access for each warehouse and car parking is provided within each stage of development. The proposal makes no change to the approved car parking numbers on site. Car parking sufficient for the operation of each of the stages will be completed prior to the operation of that stage.

3.2.4. Timing

3.2.4.1. Stages

SSD-7500 MOD1 approved the redevelopment of the site in four stages. The proposal for the staged construction of the four warehouses as approved is set out below.

- Stage 1: 9,078m² of warehousing GFA and 300m² of office GFA
- Stage 2: 9,500m² of warehousing GFA and 500m² of office GFA
- Stage 3: 31,000m² of warehousing GFA and 1,000m² of office GFA
- Stage 4: 40,000m² of warehousing GFA and 2,000m² of office GFA

The anticipated timing of construction is summarised below. 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 accordance with the current approval in February 2022. Works will include 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 Q2 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 Q2 2022. 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 SSD-7500 MOD1 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 stage is anticipated to be 9-12 months.

3.3. PROPOSED AMENDMENTS TO CONDITIONS OF CONSENT

This section outlines the proposed rewording of the approved conditions of consent. The proposed modifications are shown by a strike through the deleted text and red text for new text.

3.3.1. Condition B4 Parking

It is proposed to amend Condition B43 to update the reference to the Site Masterplan to reflect the amended Site Masterplan. 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 – Stage 1, 2, 3 & 4, revision C, prepared by Watch This Space Design, dated 06/10/2021~~ **Site Masterplan – Stage 1, 2, 3 & 4, Drawing No. SSD-7500 MOD2, revision C, prepared by Watch This Space Design, dated 11/02/2022.***

3.3.2. Condition B44 Landscaping and Vegetation Management

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:

- B44. 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 – Stage 1, 2, 3 & 4, revision C, prepared by Watch This Space Design, dated 06/10/2021~~ **Site Masterplan – Stage 1, 2, 3 & 4, Drawing No. SSD-7500 MOD2, revision C, prepared by Watch This Space Design, dated 11/02/2022;**

(c) ensure any plantings in the vicinity of 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.

3.3.3. Appendix A Schedule of Approved Drawings

It is proposed to amend Appendix A of the SSD-7500 MOD1 development consent to update the approved documents in accordance with the proposed modification. The updated drawing list is at **Appendix A** to this Modification Report.

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.

4.1. STATUTORY REQUIREMENTS

Table 6 categorises and summarises the relevant requirements in accordance with the DPE *State Significant Development Guidelines*. A detailed statutory compliance table for the modified project is provided at **Appendix B**.

Table 6 Identification of Statutory Requirements for the Project

| Statutory Relevance | Action | Consistency with Approved Development |
|---|--|---|
| <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 MOD1 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. |
| Other approvals | | |
| No requirements for other approvals have been identified for the Modification Report. | | |

4.2. PRE-CONDITIONS

The relevant pre-conditions to exercising the power to grant approval were outlined in the EIS for the original SSDA. The pre-conditions which are relevant to the project as modified and the section where these matters are addressed within the report are summarised in **Table 7**.

Table 7 Pre-conditions

| Statutory Reference | Mandatory Consideration | Section in Modification Report |
|---|--|--|
| Consideration under the EP&A Act and Regulation | | |
| Section 1.3 | Relevant objects of the EP&A Act | Appendix B |
| Section 4.15 | Relevant environmental planning instruments | |
| | ▪ SEPP 55 – Remediation of Land | N/A – no change proposed to current approval |
| | ▪ SEPP 64 – Advertising Structures and Signage | N/A – no change proposed to current approval |

| Statutory Reference | Mandatory Consideration | Section in Modification Report |
|---|---|--|
| | <ul style="list-style-type: none"> State Environmental Planning Policy (Infrastructure) | <p>The proposal will not have any material impacts on the traffic assessment previously approved under SSD-7500 MOD1. No change to the approved car parking provision is proposed.</p> <p>Accordingly, a referral to the RMS will not be required.</p> |
| | <ul style="list-style-type: none"> Campbelltown LEP 2015 | Appendix B |
| | Relevant draft environmental planning instruments <ul style="list-style-type: none"> Draft State Environmental Planning Policy (Remediation of Land) | N/A – no change proposed to current approval |
| | Relevant planning agreement or draft planning agreement <ul style="list-style-type: none"> None relevant to the proposed development | N/A |
| | Development Control Plans <ul style="list-style-type: none"> Campbelltown Development Control Plan 2015 (CDCP 2015) | Appendix B |
| | The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality. | Section 7.4 |
| | The suitability of the site for the development | Section 7.5 |
| | The public interest | Section 7.6 |
| 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). | Section 3 |
| Mandatory relevant considerations under EPIs | | |
| CLEP 2015 | Objectives and land uses for IN1 Zone Part 4 – Principal development standards <ul style="list-style-type: none"> Clause 4.3 Height of buildings Part 5 – Miscellaneous provisions <ul style="list-style-type: none"> Clause 5.21 Flood planning | Appendix B |

| Statutory Reference | Mandatory Consideration | Section in Modification Report |
|----------------------------------|--|---------------------------------------|
| | Part 7 – Additional local provisions <ul style="list-style-type: none"> ▪ Clause 7.1 Earthworks | |
| Development Control Plans | | |
| CDCP 2015 | <p>Clause 11 of the SRD SEPP states that development control plans (whether made before or after the commencement of this Policy) do not apply to SSD.</p> <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 7 Industrial Development</p> <ul style="list-style-type: none"> ▪ 7.2 Building Form and Character ▪ 7.2.2 Building Setbacks ▪ 7.2.3 Fences ▪ 7.3 Car Parking and Access ▪ 7.4 Landscaping. | Appendix B |

5. STAKEHOLDER ENGAGEMENT

Stakeholder engagement has been undertaken by Urbis and Charter Hall during the preparation of the Modification Report. This included direct engagement and consultation with the Department of Planning and Environment. Telephone and email discussions with Thomas Bertwistle at DPE were undertaken on 25th and 28th January 2022. A summary of the responses to issues raised is provided in **Table 8**. Each of the issues has been categorised in accordance with DPE guidelines.

Table 8 Stakeholder Views

| Issue | Applicant Response |
|---|---|
| Strategic Context | |
| None relevant | Not applicable. |
| Project and Key Alternatives | |
| None relevant. | Not applicable. |
| Statutory Issues | |
| DPE indicated the proposed modification can be lodged under Section 4.55(1A) of the <i>Environmental Planning and Assessment Act 1979</i> . | The proposed modification has been assessed in detail. The supporting reports demonstrate the potential environmental impact is minimal. Accordingly, the application is lodged under section 4.55(1A) of the Act. |
| Future Community Engagement | |
| None relevant | Not applicable. |
| EIS Matters | |
| None relevant. | Not applicable. |
| Beyond Scope or Issues Not Relevant to Project | |
| None relevant. | Not applicable. |

6. ASSESSMENT OF IMPACTS

This section provides a comprehensive summary of the updated 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.

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. TRAFFIC AND TRANSPORT

6.1.1. Existing Environment

The site is in an established industrial area with connections to the regional and classified road network. The approved development will generate additional light and heavy vehicle movements to, from and within the site during construction and operation.

The Traffic Impact Assessment prepared in support of SSD-7500 MOD1 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.

6.1.2. Potential Impacts

Site Access

The proposed relocation of the driveway for Stage 1 further to the north off Culverston Road by approximately 42 metres will not result in any material impacts to the accessibility of the site. The relocation of the driveway will enable it to be centrally located which will provide a more efficient and functional access point for vehicles to enter the car park. Overall, the relocation of the driveway is a minor change, and will not have any impacts on the acceptability of vehicular access to and egress from the Stage 1 car parking area.

As set out in the Transport Statement at **Appendix E**, the relocation of the Stage 1 warehouse by approximately 2 metres westwards and northwards would not have any detrimental impacts on the ability for trucks to access the Stage 1 site, manoeuvre into and out of the warehouse loading docks and depart the site. Accordingly, the minor movement of the warehouse building is considered acceptable with regard to heavy vehicle access.

The proposed relocation of the Stage 1 boundary northwards by 1.94 metres will reduce the width of the vehicular access driveway along the southern boundary of Stage 2 by 1.94 metres. The approved Stage 2 southern access driveway is 12 metres wide. The proposed modification amends this driveway width to 18.06 metres.

As set out in the Transport Statement, the Stage 2 southern access driveway as approved provides bi-directional traffic movements, consisting of inbound truck movements to access the warehouse, as well as inbound and outbound car movements accessing the secondary car park located along the western boundary of the Stage 2 site. Outbound truck movements from the Stage 2 site are via the northern egress driveway.

As the modification proposes to amend the Stage 2 access driveway operations to a one-directional access driveway for trucks and cars, all vehicle exit movements will be via the Stage 2 northern egress driveway. No change is proposed to the access arrangements to/from the primary car park.

As set out in the Transport Statement, appropriate delineation will be provided to the southern boundary of the Stage 2 northern access driveway for the movement of cars. The Transport Statement concludes that the proposed modifications to the site access are acceptable.

Car Parking

SSD-7500 MOD1 approved a total of 505 car parking spaces at the site, with future provision for an additional 87 spaces. The approved car parking provision reflects RMS rates, tenant requirements and

Campbelltown DCP 2015 (**CDCP 2015**) requirements. The approved car parking provision for Stage 1 of the development is 77 spaces.

The proposed modification makes no changes to the GFA of the approved warehouse or ancillary office or the approved parking provision. As such, car parking at the site will remain acceptable as approved.

6.2. BUILT FORM AND LANDSCAPING

6.2.1. Existing Environment

The site is located within an established industrial area and comprises hardstand and detached buildings. The local area is characterised by large warehouse/industrial developments.

6.2.2. Potential Impacts

Built Form

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 adjustment of the Stage 1 warehouse by 2 metres to the west and north and the office 2 metres to the east efficiently utilises the space on site. It will enhance the functionality of both spaces to better meet the needs of the tenant. The relocation of the warehouse relative to the office is a minor modification and will not have any material impacts to the overall built form and massing of the previously approved design. There will be no change to the approved warehouse or office gross floor area and accordingly, there will be no increase to the overall visual bulk or scale of the development.

The extension of the rear awning façade to the south is minimal and does not have any material impact upon the overall approved built form and site context. The awning extension will align with the south-western corner of the warehouse and will have minimal impact on the environment and built form.

The amended position of the retaining wall to the car park is proposed to make better use of the space between the eastern façade of the Stage 1 warehouse and the car parking area. There is no change to the design of the wall, the car park or the number of car parking spaces. The relocation of the retaining wall by 0.5 metres is not considered to have any material impact on the acceptability of the site design as approved.

Landscaping

The modified site access results in no overall net change to the approved landscaping. As set out in the Landscape Plans at **Appendix D**, the landscape design has been adjusted southwards to accommodate the revised access for cars to the Stage 1 site, maintaining the quantum of landscaping and planting specification. Accordingly, the impact to landscaping on site will be negligible and will remain acceptable as approved.

6.3. VISUAL IMPACT

6.3.1. Existing Environment

The site is consistent with the industrial character of the area and is predominantly characterised by bulky rectangular forms, with significant setbacks from the surrounding roads. Under the previous approval SSD-7500 MOD 1, a Visual Impact Assessment (**VIA**) was conducted, which concluded the visual impacts of the proposal to be acceptable.

6.3.2. Potential Impacts

As set out in the VIA Addendum at **Appendix F**, the proposed modifications are found to be minor and the magnitude of change and resultant extent of visual impact will be negligible. Of the viewpoints assessed in the VIA (**Figure 7**), Viewpoints 2 and 3 have the potential to be affected by the proposed modifications.

Most of the Stage 1 development as seen from Viewpoint 2 (**Figure 8**) would be obscured behind Stage 3 and existing vegetation along Airs Road. The VIA Addendum finds that the proposed change under this modification is negligible and would not change the overall assessment of the view. Similarly in Viewpoint 3,

as shown in **Figure 9**, the proposed change to the Stage 1 development would be negligible and not change the overall assessment of the view.

Overall, the VIA addendum finds that the conclusions of the approved VIA for MOD 1 remain accurate and applicable to the proposed modification, considering the representative views modelled, the level of visual effects and potential visual impacts, and would cause minimal environmental impact.

Figure 7 Photomontage view location map



Source: Urbis Visual Impact Assessment SSD-MOD-1

Figure 8 VIA Viewpoint 02



Picture 1 Existing corner to north-eastern corner of site from Airds Road



Picture 2 Proposed view to north-eastern corner of site from Airds Road with SSD-7500 built form outline

Figure 9 VIA Viewpoint 03



Picture 1 Existing view to north-west corner of site



Picture 2 Proposed view to north-west corner of site with SSD-7500 built form outline

Source: Urbis

6.4. FLOODING AND STORMWATER

6.4.1. Existing Environment

The site is affected by the 1% AEP flood event. As approved under SSD-7500 MOD1, the site is proposed to be filled above the 1% AEP flood level mitigating any adverse flood impacts.

6.4.2. Potential Impacts

As set out in the Soil and Water Management Statement at **Appendix G**, the development areas, building floor levels and drainage management measures remain consistent with those assessed and approved under SSD-7500 MOD1.

The Soil and Water Management Statement concludes the impacts and measures as approved under SSD-7500 MOD1 remain consistent with the proposed modification. As such the soil and water assessment and measures for this modification are considered acceptable.

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 modified design has been carefully considered to minimise any potential impacts. The proposed modification meets the objectives of the project by responding to the tenant requirements to deliver additional employment and local investment.

The proposed modification results in minor amendments to the approved built form and layout which are generally consistent with the approved warehousing and distribution uses and operational parameters. The design of the modification has been carefully considered to respond to the local context and minimise any potential impacts on the streetscape.

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 and compatible with the surrounding development and local context.

Implementation of the recommended mitigation measures will avoid 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 (CLEP 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.

The DCP controls have been addressed on a merit basis (refer **Appendix B**) so the proposed development is compatible and consistent with the existing, approved and likely future development in the locality, including relevant technical requirements (e.g. 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.

7.4. LIKELY IMPACTS OF THE MODIFIED 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 Impact: the development as modified will not result in any material impacts to the previously approved traffic and car parking assessment under SSD-7500-MOD-1.

The proposed reduction in the width of the southern driveway in Stage 2 will maintain safe vehicle movements across the site, by limiting the driveway to one-way movements and providing for all exit movements via the northern driveway.

The proposed modifications do not propose any changes to the approved GFA and accordingly, do not result in an increase to traffic generation or any changes to the previously approved number of car parking spaces. As such the traffic impacts of the proposal are considered acceptable.

- Visual Impact: as set out in **Section 6**, the proposal is a minor modification without any overall material change to the built form and massing of the development. The magnitude of change and resultant extent of visual impact will be negligible. The level of visual effects and potential visual impacts would be acceptable and of minimal environmental impact.
- **Social:** The proposed modifications will have positive social impacts by delivering employment 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.

7.5. 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 achieves the zone objectives including provision of warehouse development and employment opportunities, while avoiding adverse effects on other land uses.
- The development complies with the CLEP 2015 and the CDCP 2015 including in relation to built form, car parking, visual impacts 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.

7.6. 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 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, car parking, built form or views during construction and ongoing operation of the facility.
- The issues identified during the stakeholder engagement have been addressed through the assessment of the impacts of the modified project.

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

DISCLAIMER

This report is dated 17 February 2022 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Charter (**Instructing Party**) for the purpose of Environmental Impact Assessment (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied.

Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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

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

APPENDIX A

UPDATED PROJECT DESCRIPTION

APPENDIX B

STATUTORY COMPLIANCE TABLE

APPENDIX C

ARCHITECTURAL DRAWINGS

APPENDIX D

LANDSCAPE PLANS

APPENDIX E

TRANSPORT STATEMENT

APPENDIX F

VISUAL IMPACT ASSESSMENT ADDENDUM

APPENDIX G

SOIL AND WATER MANAGEMENT STATEMENT

