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URBIS

5 & 9 CULVERSTON ROAD, MINTO

Modification Report

Prepared for
CHARTER HALL
28 February 2022

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

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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 amend development consent SSD-7500 (as previously modified) 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.

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

On 14 February, Modification 2 (**MOD2**) to SSD-7500 was lodged with the Department of Planning (**DPE**). MOD2 seeks minor modifications to the siting of the Stage 1 development in response to tenant operational requirements.

Since the approval of SSD-7500 MOD1, the intended tenant for Stage 2 of the development has confirmed they will not be proceeding with their proposed occupation. As such, the tenant specific modifications to Stage 2 as approved under MOD1 are no longer required. Charter Hall are seeking to modify Stage 2 to optimise the potential floorspace by reinstating the original second warehouse tenancy, while maintaining the current approved layout to the north which better responds to the general market requirements.

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 2 of the development are summarised as follows:

- Reinstating the original approved second warehouse tenancy to the west, including ancillary office and loading areas, providing a total warehouse GFA of 17,490m² and ancillary office GFA of 1,000m² within Stage 2.
- Providing an additional 19 car parking spaces in the western car park.
- Providing palisade fencing fence to hardstand/loading areas and the Stage 2B car park.
- Reducing the entry driveway width adjacent to the fire tank by 1.5 metres to accommodate a pedestrian pathway.

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 55 – Remediation of Land*
- *State Environmental Planning Policy 64 – Advertising Structures and 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 to confirm the relevant approvals pathway for the proposed modification.

The amended layout is generally consistent with the previous development plan presented to Campbelltown City Council during the preparation of Modification 1. Each of the comments made by Council were addressed in the previous application and accordingly, further engagement was not considered necessary for this proposal.

Assessment of Impacts

The modified proposal is assessed 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 acceptable 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. 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 on behalf of Charter Hall to modify SSD-7500 (as previously modified) 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 site plan approved under SSD-7500 is shown in **Figure 3**.

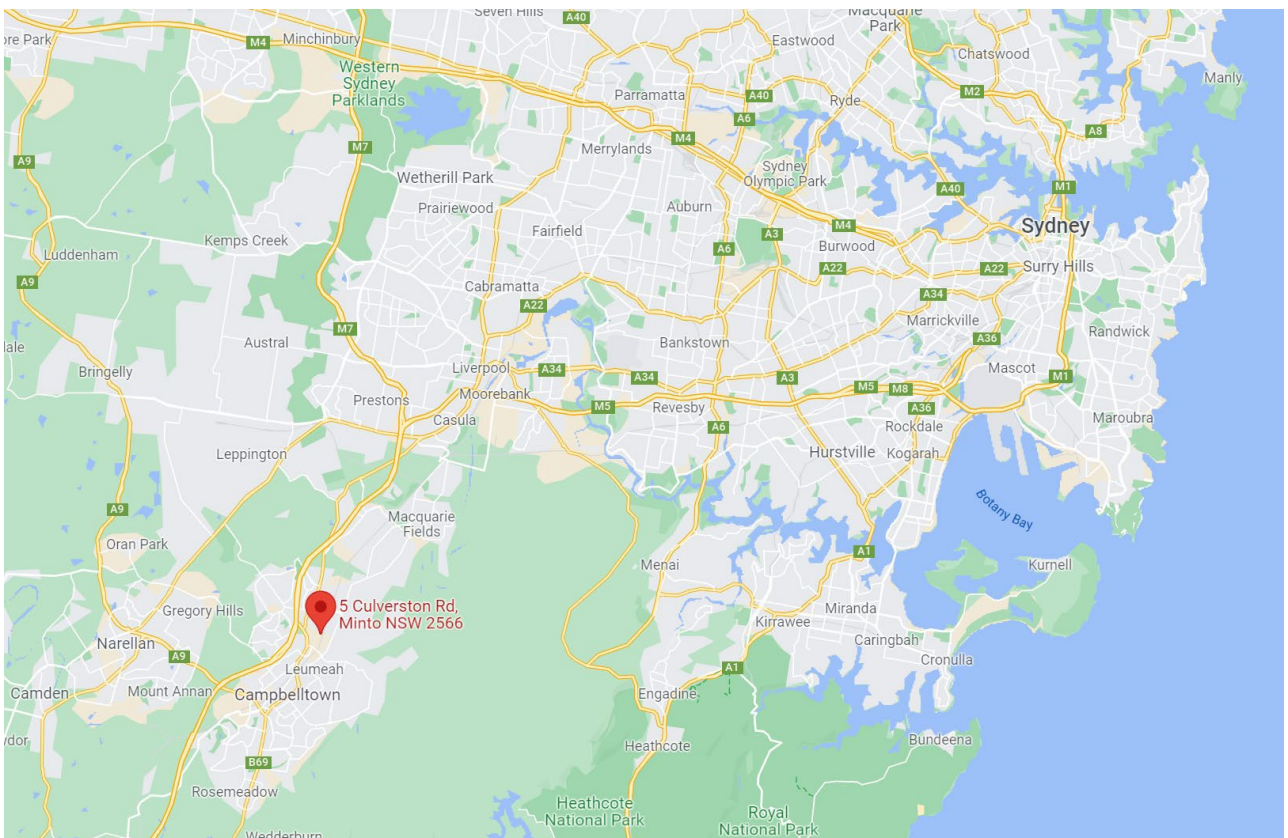
The development consent has been implemented through the completion of initial ground works and remediation. The approved warehouses are to be delivered in stages and in response to tenant demand.

Figure 1 Aerial view of site



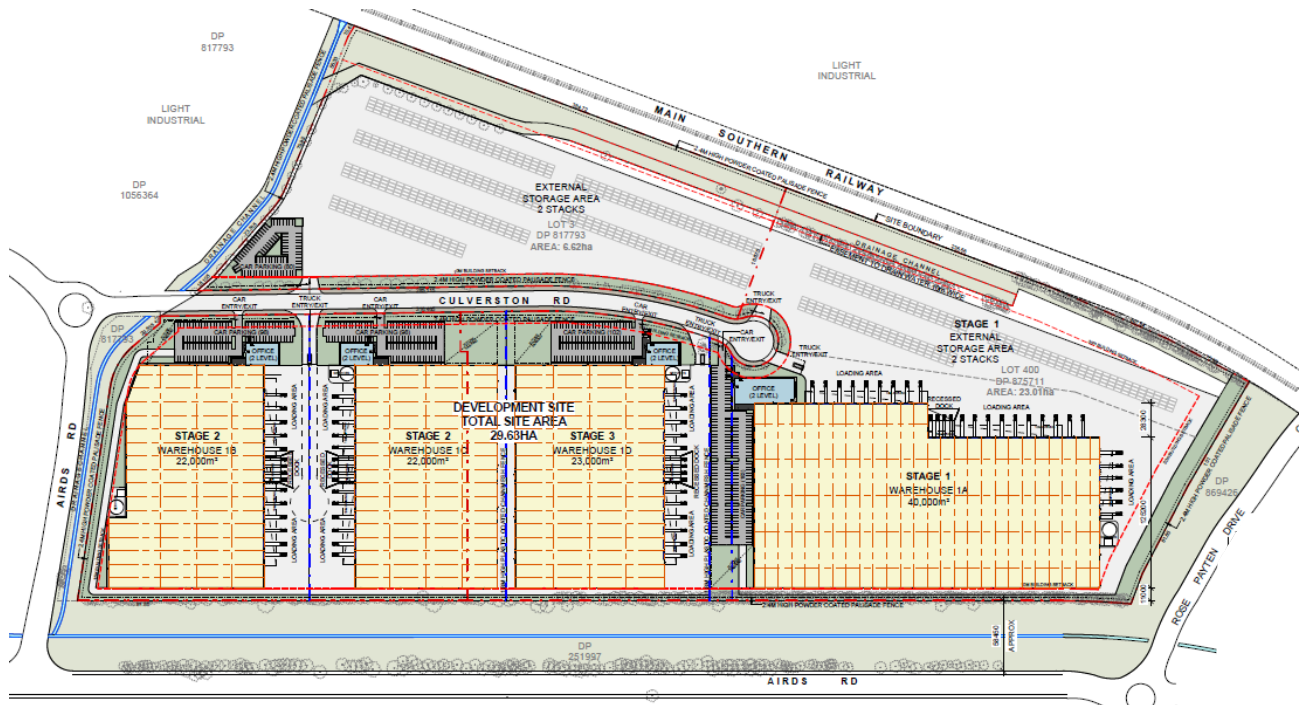
Source: Urbis

Figure 2 Regional context



Source: Google Maps 2021

Figure 3 Approved site plan SSD-7500



Source: Reid Campbell

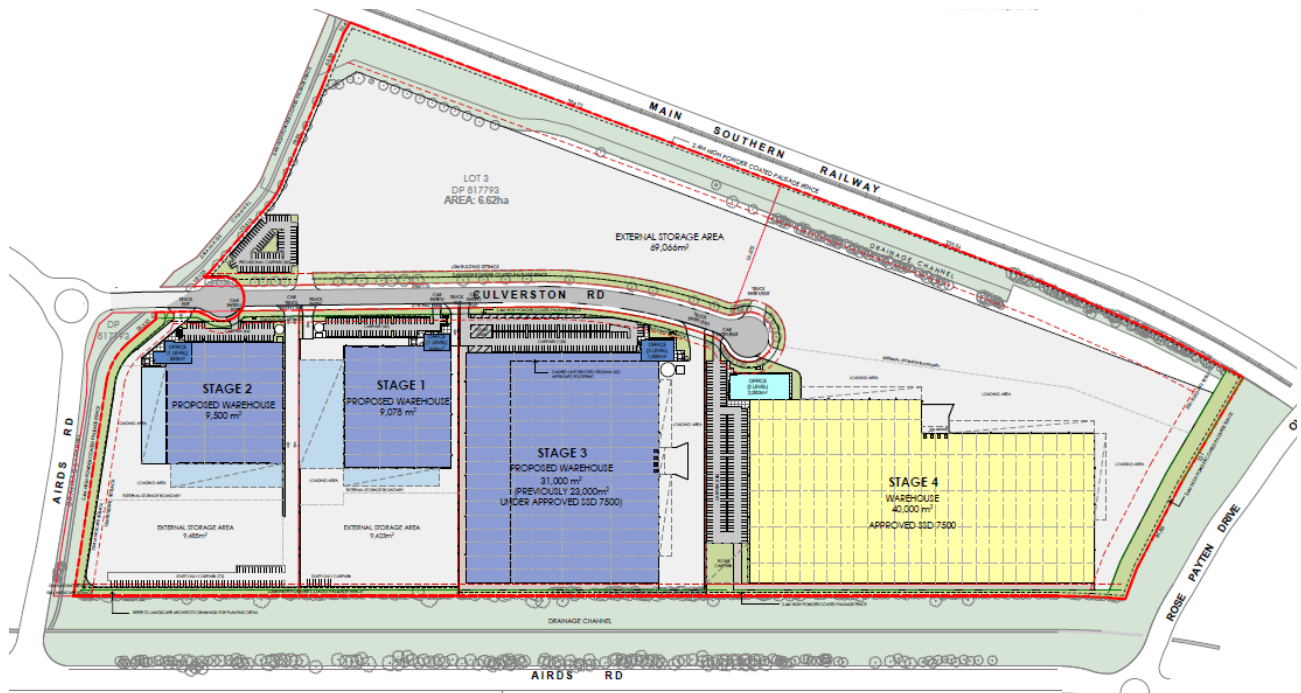
1.1.1. Approved Development – SSD-7500 MOD1

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 4 Approved site plan SSD-7500 MOD-1

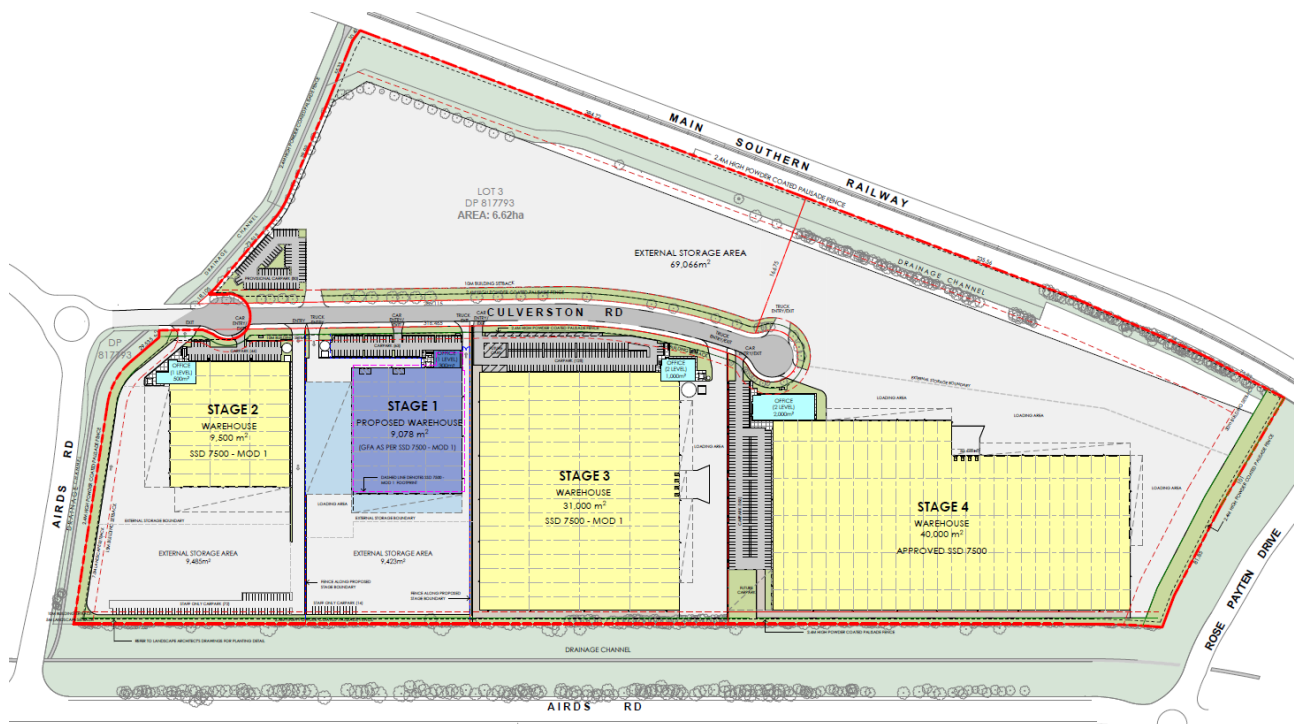


Source: Watch This Space Design

1.1.2. Pending Modification – SSD-7500 MOD2

On 14 February, Modification 2 to SSD-7500 was lodged with the Department of Planning. Following the approval of MOD1, the future tenant for Stage 1 progressed the detailed design for their site. This identified the need for minor modifications to the approved plans to meet their operational requirements. .

Figure 5 MOD2 proposed site plan



1.3. PROPOSED MODIFICATIONS

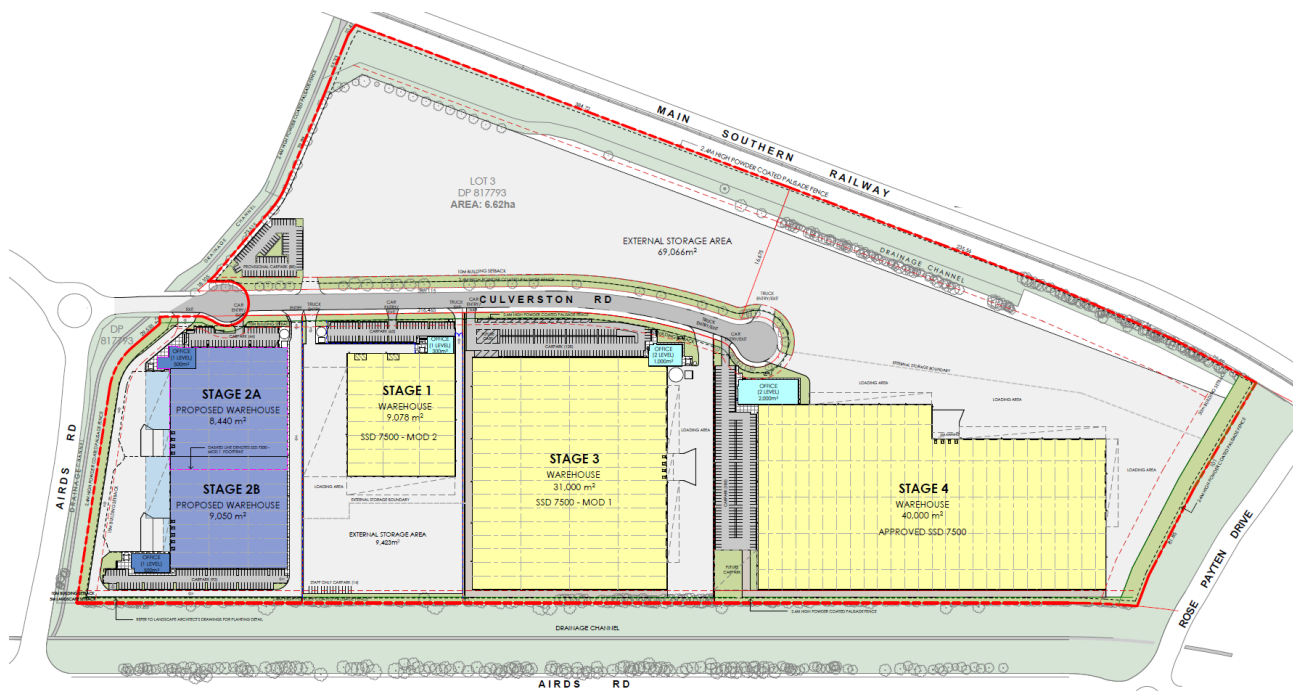
This Modification Application seeks changes to the plans and conditions associated with SSD-7500 (as previously modified). The intended tenant for Stage 2 of the development has confirmed they will not be proceeding with their proposed occupation. As such, the tenant specific modifications to Stage 2 as approved under MOD1 are no longer required. Charter Hall are seeking to modify Stage 2 to optimise the potential floorspace by reinstating the original second warehouse tenancy, while maintaining the current approved layout to the north which better responds to the general market requirements.

As such, the tenant specific modifications to Stage 2 approved under MOD1 are no longer required and Charter Hall are seeking to return Stage 2 to a speculative development format, as was originally approved under SSD-7500. Accordingly, modifications are required to the approved plans for Stage 2 including:

- Reinstating the original approved second warehouse tenancy to the west, including ancillary office and loading areas, providing a total warehouse GFA of 17,490m² and ancillary office GFA of 1,000m² within Stage 2.
- Providing 19 additional car parking spaces in the western car park.
- Providing palisade fencing fence to hardstand/loading areas and the Stage 2B car park.
- Reducing the entry driveway width adjacent to the fire tank by 1.5 metres to accommodate a pedestrian pathway.

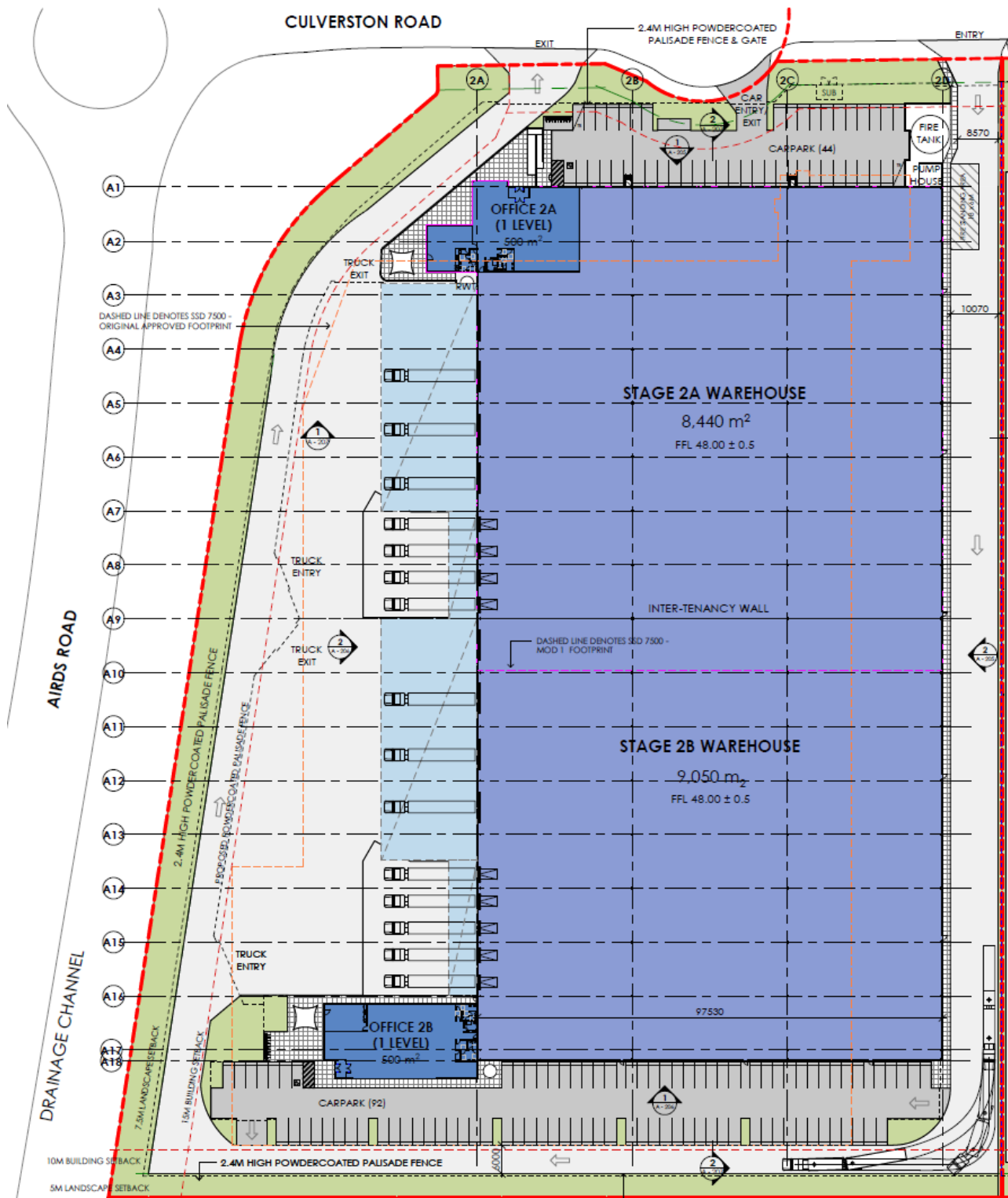
An overlay of the Stage 2 approval from SSD-7500 with the proposed modification is shown in **Figure 7** below.

Figure 6 Proposed site plan



Source: Watch This Space Design

Figure 7 SSD-7500 and MOD3 Stage 2 overlay



SSD-7500 building footprint shown dashed orange

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 optimise the timely delivery of employment by delivering a development that is capable of meeting general market demand and potential future tenant requirements.
Ensure minimal environmental and amenity impact	The proposed modification has been designed to ensure minimal environmental and amenity impact.
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 (as modified). However, this option was dismissed as it would not allow the site potential for the delivery of employment opportunities to be maximised. If the approved site layout it is maintained this could result in the loss of employment opportunities and the associated investment in the local and regional economy.
Alternative Design	Consideration was given to the delivery of the original approved layout (prior to Modification 1), however this layout does not optimise the functionality of the site and results in an irregular warehouse shape which was not well-received by potential incoming tenants. Again, this could result in the loss of employment opportunities and associated impacts on local employment and investment.
The Proposal	<p>The proposed modification was identified as being the most suitable proposal as it facilitates the delivery of warehouse and distribution floorspace in accordance with general market demand. The proposal optimises identification of tenants to occupy the approved buildings and deliver 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"> ▪ Is appropriately zoned to accommodate the proposed 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 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

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. 	<p>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.</p>
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. 	<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 demand and will support the growth and enhancement of industrial land.</p>
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. 	<p>The modified proposal will contribute to the diversification and strengthening of the local economy. The modification will enable the delivery of industrial uses in a designated industrial area, strategically located to Campbelltown. The modified proposal 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.</p>

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 reinstate the original second warehouse tenancy, while maintaining the current approved layout which is oriented to the northern boundary. 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 with the original development in **Table 5**. This table has been prepared in accordance with Appendix B of *State Significant Development Guidelines – preparing a modification report* and section 4.55(1A)(b) of the EP&A Act 1979.

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: 107,000m ² Office GFA: 5,000m ²	Warehouse GFA: 97,568m ² Office GFA: 4,300m ²
External Storage Area	8.8 hectares	No change
Parking Spaces	481 car parking spaces and nine (9) accessible spaces 147 provisional car parking spaces	524 car parking spaces including eight (8) accessible spaces 87 provisional car parking spaces
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	Warehouse 1A: 40,000m ² of warehousing GFA and 2,000m ² of office GFA Warehouse 1B: 22,000m ² of warehousing GFA and 1,000m ² of office GFA	Stage 1: 9,078m ² of warehousing GFA and 300m ² of office GFA Stage 2: 17,490m ² of warehousing GFA and 1,000m ² of office GFA

Element	Approved Project	Modified Project
	Warehouse 1C: 22,000m ² of warehousing GFA and 1,000m ² of office GFA	Stage 3: 31,000m ² of warehousing GFA and 1,000m ² of office GFA
	Warehouse 1D: 23,000m ² of warehousing GFA and 1,000m ² of office GFA	Stage 4: 40,000m ² of warehousing GFA and 2,000m ² of office GFA

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 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 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 Airds 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.

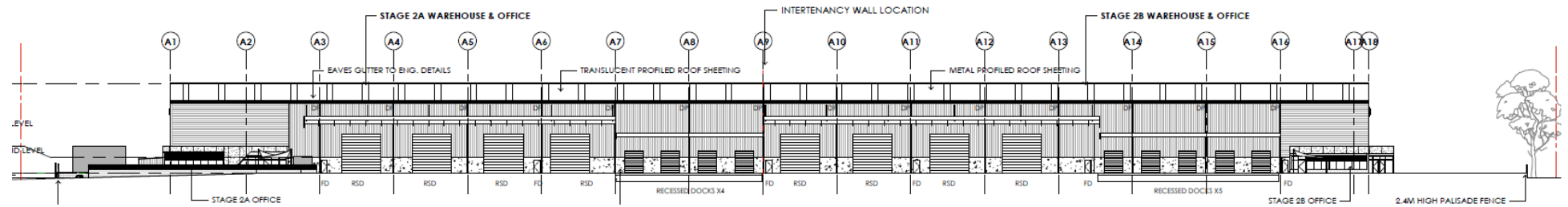
3.2.2. Physical Layout and Design

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 to Stage 2 includes:

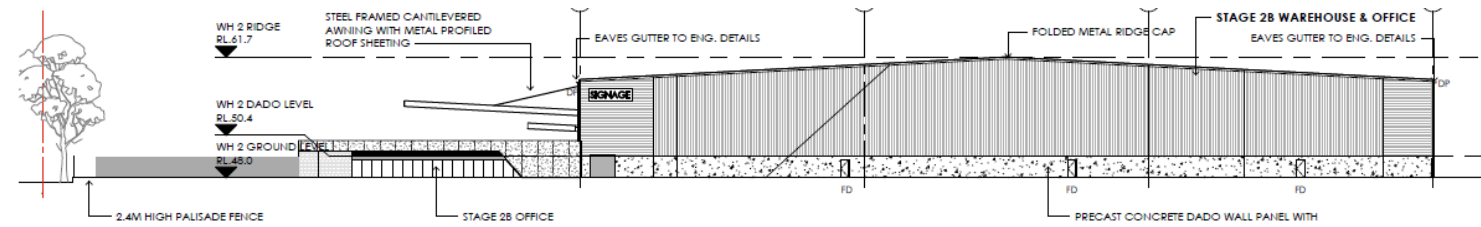
- Reinstating the original approved second warehouse tenancy to the west, including ancillary office and loading areas, providing a total warehouse GFA of 17,490m² and ancillary office GFA of 1,000m² within Stage 2.
- Providing 19 additional car parking spaces in the western car park.
- Providing palisade fencing fence to hardstand/loading areas and the Stage 2B car park.
- Reducing the entry driveway width adjacent to the fire tank by 1.5 metres to accommodate a pedestrian pathway.

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

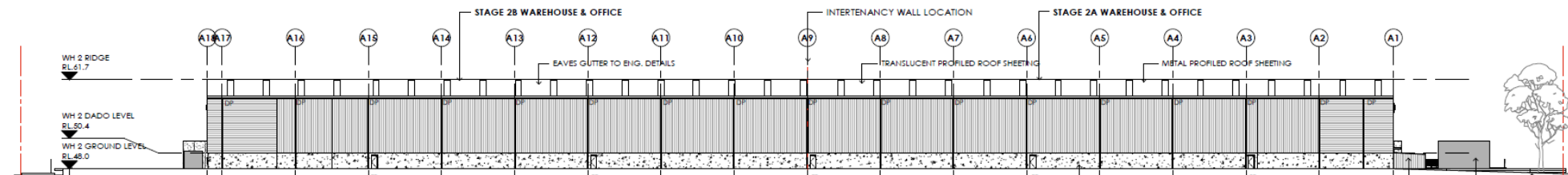
Figure 8 Proposed Stage 2 elevations



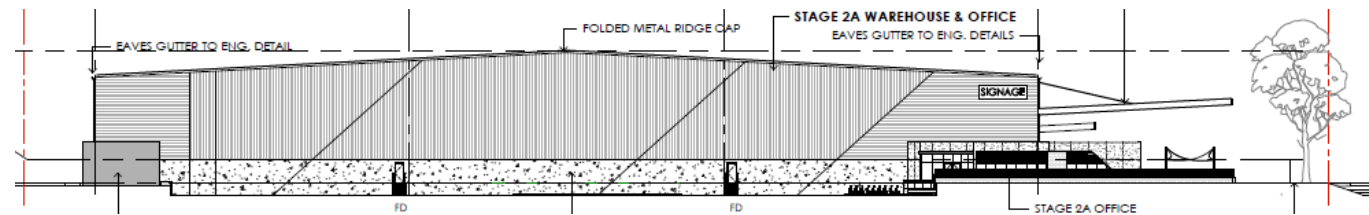
North elevation



West elevation



South elevation



East elevation

Source: Watch This Space Design

3.2.3. Uses and Activities

The proposed modification does not propose any changes to the approved warehouse and distribution centre use with ancillary office space. Site activities 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 seeks to provide an additional 19 car parking spaces. 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: 17,490m² of warehousing GFA and 1,000m² 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 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 ~~505~~ **524** car parking spaces including eight (8) accessible spaces on-site, in accordance with the relevant Australian Standards.*

3.3.2. 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 MOD3, revision D, prepared by Watch This Space Design, dated 24/02/2022.***

3.3.3. 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 MOD3, revision D, prepared by Watch This Space Design, dated 24/02/2022;***

(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.

3.3.4. 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) 	Section 6 and Appendix E
	<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 Clause 4.4 Floor space ratio Part 5 – Miscellaneous provisions <ul style="list-style-type: none"> Clause 5.21 Flood planning Part 7 – Additional local provisions <ul style="list-style-type: none"> Clause 7.1 Earthworks 	Appendix B

Statutory Reference	Mandatory Consideration	Section in Modification Report
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 2 Requirements Applying to All Types of Development</p> <ul style="list-style-type: none"> ▪ 2.21 Acoustic Privacy <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 with DPE during the preparation of the Modification Report. This included telephone and email discussions with Thomas Bertwistle on 24 February 2022 to confirm the relevant approvals pathway.

The amended layout is generally consistent with the previous development plan presented to Campbelltown City Council during the preparation of the application for Modification 1. Each of the comments made by Council were addressed in the previous application and accordingly, further engagement was not considered necessary for this proposal.

A summary of the responses to issues raised by DPE 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.

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.

A Transport Assessment (TA) has been prepared to assess the traffic and parking impacts of the proposed modification and is attached at **Appendix E**.

6.1.2. Potential Impacts

Site Access

Entry and egress from the eastern car park is from Culverston Road. The southern Stage 2 access driveway provides shared car and truck access to both the western car park and the warehouse loading docks, with a one-way circulation route through the site.

The proposed reduction in the entrance to the Stage 2 access driveway adjacent to the fire tank by 1.5 metres is to accommodate a pedestrian pathway. The proposed amendment does not result in any impacts on the functionality of the driveway for cars or heavy vehicles. The proposed pathway provides a pedestrian access route to the western car parking areas. Swept path diagrams for the proposed modification are provided within the TA in compliance with the relevant Australian Standards.

Car Parking

The approved car parking provision reflects RMS rates, tenant requirements and Campbelltown DCP 2015 (**CDCP 2015**) requirements. The approved car parking provision for Stage 2 of the development is 117 spaces with 44 car parking spaces in the eastern car park and 72 in the western car park.

The modification proposes to reinstate the second warehouse tenancy in Stage 2 to deliver 8,440m² of warehouse GFA and 500m² of office GFA in Stage 2A and 9,050m² of warehouse GFA and 500m² of office GFA in Stage 2B. 19 additional car parking spaces are proposed in the western car park to meet the demand generated by the additional warehouse and ancillary office GFA. This results in a total of 136 car parking spaces for Stage 2 and 524 car parking spaces for the development overall.

As set out in the TA, the proposed car parking provision for Stage 2 meets the parking requirements of both RMS rates and the CDCP 2015.

Operational Traffic

The Traffic Impact Assessment (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 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 TA prepared in support of this modification assesses the predicted traffic generation for the proposed development. The TA concludes the daily traffic generation is expected to be less than that approved for the site under SSD-7500.

In relation to the AM and PM peaks, the TA finds that there will be a minor increase in the traffic generation compared to the approved traffic generation rate under MOD1 (which removed the second warehouse

tenancies from Stages 1 and 2). The proposed modification is anticipated to result in an additional 24 trips in the AM peak (a 12% increase) and an additional 2 trips in the PM peak (a 1% increase) by reinstating the second warehouse and ancillary office in Stage 2..

The TA assesses the impacts of the anticipated increased AM peak trip generation at key intersections. The TA finds that the Airds Road / Culverston Road roundabout will continue to operate at a LoS A as a result of the proposed modification. As such, it is considered that the proposed modification is acceptable with regard to traffic and parking impacts.

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. The proposed modification has been carefully designed to be both functional and attractive in the local context. The approved site setbacks and landscaping will be maintained and the modifications have been designed to minimise the visual impact on the surrounding area. The design incorporates high quality materials and fencing has been designed to have an acceptable impact on the streetscape. The proposed modifications will not have any material impact on the closest residential properties.

The original approved Stage 2B warehouse is reinstated by extending the modified warehouse building in the MOD1 approval to the west, with north facing loading docks and an ancillary office with staff amenity outdoor space. The scale of the proposed Stage 2 warehouse is appropriate to the site setting, maintaining the site setbacks. The loading docks are well setback from Airds Road and screened by existing and proposed planting. The reconfiguration of the Stage 2 warehouse awnings will not have any material impact upon the overall approved built form and site context.

The site coverage, setbacks and proposed landscaping, combined with the height, scale and architectural design of the building, will provide a suitable development outcome for the site. The proposed built form is commensurate with the industrial character of the area and considerate of views from the public domain and surrounding sites. 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.

Landscaping

No change is proposed to the landscape setbacks at the site. As set out in the Landscape Plans at **Appendix D**, it is proposed to provide additional landscaping to the Stage 2 western car parking area. This will provide additional softening and screening to the hardstand area. The proposed planting is in accordance with the approved planting specification for the site. As such, the proposed modification will have a minor additional benefit in relation to landscaping impacts.

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

The VIA Addendum at **Appendix F** finds that the built form proposed would not be significantly more visible than the Stage 2 development approved under MOD1 and less visible when compared to the development approved under SSD-7500. Compared to the SSD-7500 approval, the footprint of the proposed warehouse is

reduced and includes greater setbacks as viewed from Airds Road to the northern and western edges of the site. Of the viewpoints assessed in the VIA (**Figure 9**), Viewpoints 2, 3 and 4 have the potential to be affected by the proposed modifications.

Figure 9 Photomontage view location map



Source: Urbis

From Viewpoint 3 (see **Figure 10**), the proposed Stage 2B warehouse would be partially visible but screened behind existing retained vegetation along the western edge of the site. Compared to MOD1, the proposed Stage 2 warehouse building silhouette will be similar and remains partly visible from this viewpoint but is less visible compared to the approved SSD-7500 Stage 2 warehouse.

From Viewpoint 4 (see **Figure 11**), the proposed Stage 2 warehouse would be partially visible but screened behind existing retained vegetation along the northern edge of the site. The overall level of visual impact of the proposed Stage 2 development remains similar to that assessed under MOD1 and remains lesser compared to the extent of the approved SSD-7500 Stage 2 warehouse.

From Viewpoint 2, there may be some very filtered views towards the Stage 2B warehouse, but visibility is constrained by existing retained vegetation along Airds Road. There will be limited and negligible change to the overall visual impact from this viewpoint.

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 and the level of visual effects, the potential visual impacts are acceptable and would cause minimal environmental impact.

Figure 10 VIA Viewpoint 03



Proposed view to north-western corner of site from Airs Road with SSD-7500 built form outline

Figure 11 VIA Viewpoint 04



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

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

Updated Civil Engineering Drawings in accordance with the proposed modification are provided 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 minor amendments proposed to the drainage layout in relation to the proposed modification remain consistent with the impacts and measures approved under SSD-7500 MOD1. As such the flooding and stormwater assessment and measures for this modification are considered acceptable.

6.5. NOISE

6.5.1. 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.

6.5.2. Potential Impacts

As set out in the Acoustic Memorandum at **Appendix H**, the proposed use of the Stage 2 warehouse will include truck movements, loading and unloading of materials within the loading docks as well as the internal use of the warehouses.

The Acoustic Memorandum finds that the proposed modifications, including the proposed layout of the warehouses and loading docks, will result in noise impacts that comply with the relevant noise emission requirements including the project trigger noise levels of the *EPA Noise Policy for Industry* at all surrounding receivers and will therefore be acoustically 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 proposal meets the objectives of the project by responding to market demand 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 including *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**). 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: as set out in **Section 6** and the TA at **Appendix E**, the development as modified will have a lesser daily trip generation than that approved under SSD-7500. Although there will be a minor increase in trip generation at the AM and PM peaks, these vehicle movements can be satisfactorily accommodated within the local road network. As such the traffic impacts of the proposal are considered acceptable.
 - Visual Impact: as set out in **Section 6** and the VIA Addendum at **Appendix F**, the proposal is a minor modification and will have lesser visual impacts than the built form approved under SSD-7500. The magnitude of change and resultant extent of visual impact will be minor. 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 additional employment opportunities in the construction and operational phases.
- **Economic:** The proposed modifications will have positive economic impacts through enabling the delivery of increased 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 28 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 ASSESSMENT

APPENDIX F

VISUAL IMPACT ASSESSMENT ADDENDUM

APPENDIX G

CIVIL ENGINEERING DRAWINGS

APPENDIX H

ACOUSTIC MEMORANDUM

