



Environmental Impact Statement

Kogarah Golf Club Redevelopment – Concept & Early Works SSDA

13-19A Marsh Street, Arncliffe

Submitted to the NSW Department of Planning, Housing and Infrastructure
on behalf of Stockland Development Pty Limited

SSD-84467726

Prepared by Colliers Urban Planning

9 June 2026 | 2250078



'Gura Bulga'

Liz Belanjee Cameron

'Gura Bulga' – translates to Warm Green Country. Representing New South Wales.



'Dagura Buumarri'

Liz Belanjee Cameron

'Dagura Buumarri' – translates to Cold Brown Country. Representing Victoria.



'Gadalung Djarri'

Liz Belanjee Cameron

'Gadalung Djarri' – translates to Hot Red Country. Representing Queensland.

Colliers Urban Planning acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We pay our respects to their Elders past and present.

In supporting the Uluru Statement from the Heart, we walk with Aboriginal and Torres Strait Islander people in a movement of the Australian people for a better future.

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A (TEST OF ADEQUACY)

09/01/2026

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B (FINAL)

9/06/2026

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Signed Declaration

Project Details			
Project Name	Kogarah Golf Club Redevelopment – Concept & Early Works SSDA		
Application Number	SSD-84467726		
Land to be Developed	13-19A Marsh Street, Arncliffe identified as: • Lot 31 DP1231486 • Lot 61 DP1301057 • Lot 12 DP570900 • Lot 100 DP1231954 • Lot 62 DP1301057 • Lot 102 DP1231954 • Lot 60 P1301057 • Lot 63 DP1301057 • Lot 103 DP1231954		
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Registration Number	R80023		
Registration Organisation	Certified Environmental Practitioner Scheme (CEnvP)		
	The undersigned declares that this Environmental Impact Statement (EIS): • Has been prepared in accordance with the <i>Environmental Planning and Assessment Regulation 2021</i>; • Contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates; • Does not contain information that is false or misleading; • Addresses the Planning Secretary's Environmental Assessment Requirements (SEARs) for the project; • Identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments; • Has been prepared having regard to the Department's <i>State Significant Development Guidelines – Preparing an Environmental Impact Statement</i>; • Contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development; • Contains a consolidated description of the project in a single chapter of the EIS; • Contains an accurate summary of the findings of any community engagement; and • Contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.		
Signature			
Date	9/06/2026		

Summary

This Environmental Impact Statement is submitted to the NSW Department of Planning, Housing and Infrastructure in support of a State Significant Development Application (SSD-84467726) for a Concept Masterplan and Early Works (the Proposal) associated with the Kogarah Golf Club Redevelopment located at 13-19A Marsh Street, Arncliffe (the Site).

The vision for the Kogarah Golf Club Redevelopment is to create a world-class precinct that leverages the site's strategic location adjacent to Sydney Airport and strong transport connections by delivering multi-level logistics development, trade-related enterprise and supporting uses with publicly accessible open space. It seeks to deliver state-of-the-art facilities that will redefine the logistics landscape in Australia, setting new benchmarks for scale, efficiency, sustainability and innovation.

The Site is situated within the Bayside Local Government Area to the immediate west of the Cooks River and Sydney Airport, approximately 6km west of Port Botany and 10km south of the Sydney Central Business District. It currently comprises the previous Kogarah Golf Club (vacated in March 2025) and temporary M6 Stage 1 construction compound.

The Site was previously subject to a Planning Proposal (PP-2022-1748) which delivered refreshed planning controls that prioritised land uses to support the adjacent Sydney Airport, as one of Australia's most important trade gateways. The proposed amendments to the *Bayside Local Environmental Plan 2021* were gazetted on 9 May 2025, supported by agreements for the future delivery of public benefits including road upgrades and new publicly accessible open space.

This State Significant Development Application seeks consent for two (2) separate components, comprising:

- **Concept Masterplan** – Establishment of key parameters to inform separate future Detailed Development Applications for development, including maximum building envelopes, gross floor area, land uses and other parameters; and
- **Early Works** – Carrying out of initial site preparation and infrastructure works required to support future development and publicly accessible open space.

The extent of the Site and development area within the surrounding context is depicted below.



Site Location and Context Map

Source: Nearmap, edited by Colliers Urban Planning

Analysis of Alternatives

Through the development of the Proposal, alternative options have been considered in response to the strategic need and objectives for the redevelopment. The following potential alternatives were not considered suitable or appropriate:

- **Do Nothing** – A ‘do nothing’ approach and retention of the existing golf course would provide an undesirable outcome as the Site would remain underutilised, failing to facilitate the future desired character and public benefits associated with the redevelopment. It would represent a significant missed opportunity for the State and Bayside LGA, failing to capitalise on a large landholding immediately adjacent to Sydney Airport.

It would also fail to deliver critical industrial floorspace in Eastern Sydney on a site with demonstrated capacity for increased intensity and efficiency. Specifically, it would fail to support between 1,750 to 2,890 direct ongoing full-time equivalent jobs and between \$470 million and \$630 million in direct value-add each year once fully occupied.

- **Alternative Purpose** – The use of the Site for an alternative purpose, including residential development, has been determined to be inappropriate given its position directly adjacent to Sydney Airport, as one of Australia’s most important trade gateways. The provision of appropriate land uses, and land use mix was considered under the previous Planning Proposal (PP-2022-1748), determining the Site should be primarily used for uses that support the operation and projected growth of Sydney Airport.

It is noted that the proposed Concept Masterplan seeks to enable sufficient land use flexibility to facilitate alignment with market conditions and the highest and best use over the life of the project.

- **Alternative Design and Layout** – A detailed options analysis has occurred to ensure that the operational efficiency of the development is maximised, while environmental impacts are minimised through established land ownership arrangements and statutory provisions. The analysis determines that alternative designs and layouts are inappropriate due to increased bulk and scale, inability to provide high amenity ancillary office areas, unfeasible staging strategies, and failure to achieve the assessed gross floor area permissible under the *Bayside Local Environmental Plan 2021*.

On this basis, the potential alternatives are not considered suitable or appropriate, and the Proposal (described in the following section) represents the best outcome for the Site.

The Proposal

The State Significant Development Application seeks consent for the following:

- Concept Masterplan to support the staged delivery of the Kogarah Golf Club Redevelopment, including:
 - Maximum building envelopes, including maximum building heights and minimum building setbacks;
 - Maximum gross floor area up to 343,250m², comprising:
 - 3,250m² of GFA (FSR of 1.25:1) on Lot 31 DP1231486; and
 - 340,000m² of GFA on Lot 100 DP1231954.
 - Conceptual primary land uses, including:
 - Block 1 – Mixed-use and advertising structures;
 - Block 2 – Logistics and mixed-use;
 - Block 3A – Logistics;
 - Block 3B – Logistics; and
 - Block 3C – Logistics and data centre.
 - Urban Design Guidelines to guide future development of the built form and public domain; and
 - Strategies and mitigation measures to manage potential environmental impacts.
- Early Works to support the future delivery of built form and publicly accessible open space, including:
 - Site preparation works, comprising:
 - Demolition of existing structures;
 - Clearing of existing vegetation;
 - Remediation works; and
 - Bulk earthworks, including ground improvement and flood mitigation works.

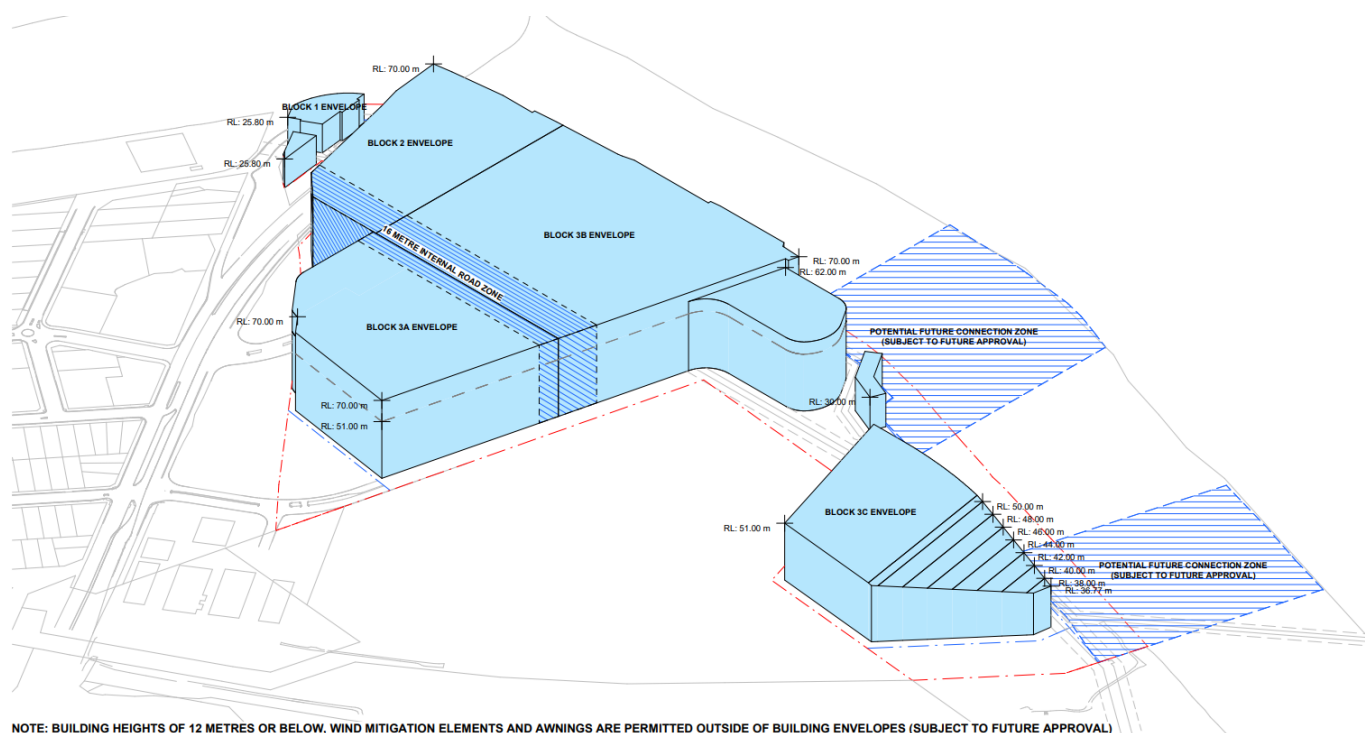
- Site servicing and infrastructure works, including:
 - Construction of the Flora Street East extension consistent with Item 3 of the executed Voluntary Planning Agreement with Bayside Council;
 - Construction of stormwater infrastructure; and
 - Construction and augmentation of service and utility infrastructure as necessary.

A summary of key components of the Concept Masterplan and Early Works is provided in the following subsections.

Concept Masterplan

The State Significant Development Application seeks consent for an overarching Concept Masterplan that establishes maximum building envelopes, gross floor area, land uses, and other parameters through Urban Design Guidelines and technical reporting.

The proposed building envelopes are presented and identify the locations of future built form, including maximum building heights and minimum buildings setbacks. The future built form, subject to separate future DAs, must be located within the prescribed envelopes



Proposed Building Envelopes – Axonometric View from the South-West

Source: Grimshaw

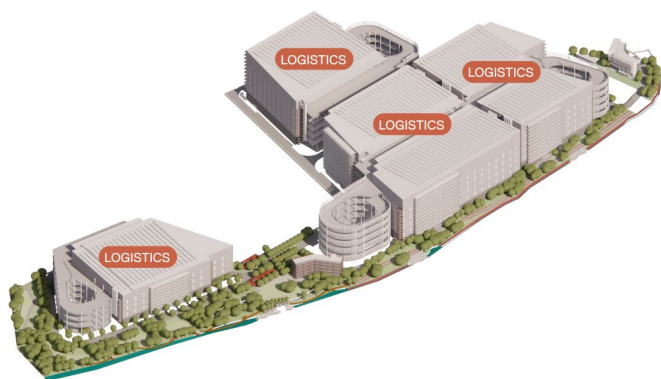
The Concept Masterplan is supported by Indicative Reference Schemes that present as ‘proof of concepts’ only within the proposed planning framework. The schemes demonstrate suitable primary land uses, built form and public domain outcomes that align with the vision for a world-class precinct that leverages the Site’s strategic location adjacent to Sydney Airport and strong transport connections.

The Indicative Reference Schemes consider different potential development outcomes enabled by the Concept Masterplan to support the delivery of the highest and best use at the time of redevelopment. This includes a Logistics scheme and Alternative Uses scheme, which facilitate the potential for four (4) different primary land use outcomes across the Site. The alternative land use outcomes enabled by the Concept Masterplan include an alternative mixed-use outcome on Block 2 and alternative data centre outcome on Block 3C.

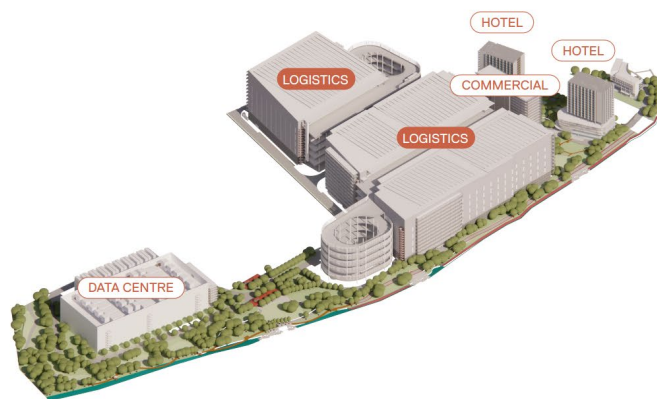
It is noted that the Indicative Reference Schemes are indicative only and the development of future built form and publicly accessible open space will be subject to future Development Applications. The Indicative Reference Schemes demonstrate the ability to support different potential outcomes, consistent with the proposed framework under the Concept Masterplan including Urban Design Guidelines.

The Indicative Reference Schemes, including the Logistics scheme and Alternative Uses scheme, are depicted in the following figures.

LOGISTICS



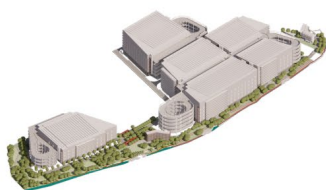
ALTERNATIVE USES



LOGISTICS

REFERENCE SCHEME 01

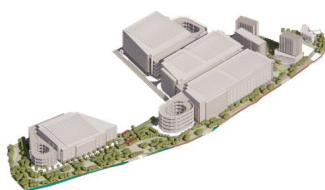
All Logistics



ALTERNATIVE USES

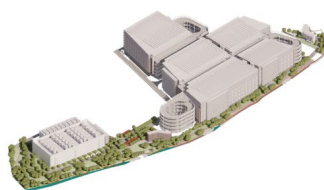
REFERENCE SCHEME 02

Hotel, Commercial and Logistics



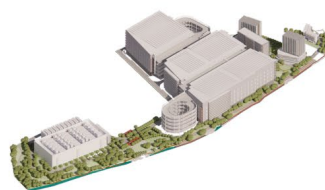
REFERENCE SCHEME 03

Data Centre and Logistics



REFERENCE SCHEME 04

Hotel, Commercial, Data Centre and Logistics



Indicative Reference Schemes – Aerial View from the South-East

Source: Grimshaw



Logistics Scheme – Aerial Perspective Render from the South-West

Source: Grimshaw



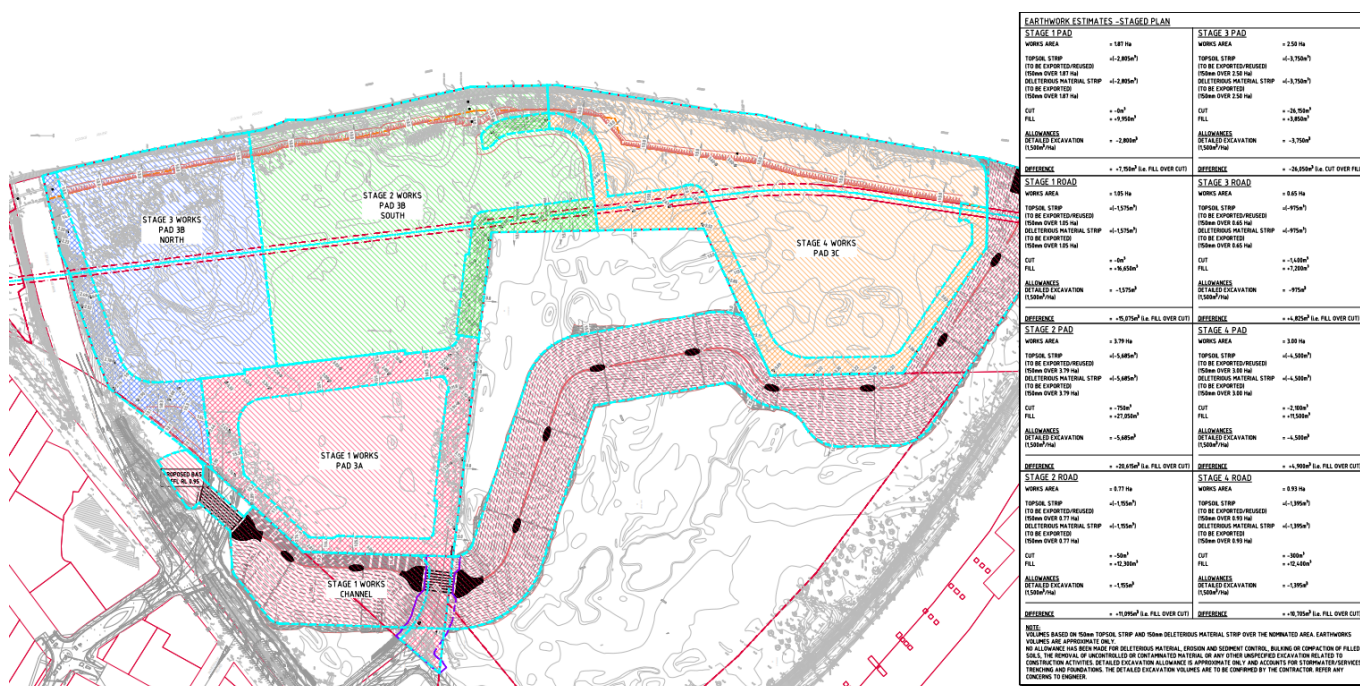
Alternative Uses Scheme – Aerial Perspective Render from the South-West

Source: Grimshaw

Early Works

The State Significant Development Application also seeks consent for the carrying out of Early Works to facilitate the initial site preparation and infrastructure works required to support future development and publicly accessible open space. It includes bulk earthworks across the development area and creation of an overland flow path outside the development area to convey stormwater run-off to the Cooks River while maintaining existing drainage patterns.

The Early Works are expected to be carried out in stages and in-line with future development, with the indicative bulk earthworks staging plan presented below.



Indicative Early Works Staging Plan

Source: Costin Roe Consulting

Stakeholder Engagement

Engagement with stakeholders has been carried out by Colliers Urban Planning and the Applicant during the preparation of the Environmental Impact Statement. It included engagement with the community through the distribution of newsletters to the surrounding area and two (2) community drop-in sessions on 25 November 2025 and 27 November 2025 at the Rowers on Cooks River.

The matters raised by the community and considered by the project team included:

- Project rationale;
- Building height, bulk and scale;
- Land use and employment;
- Land ownership;
- Traffic and parking impacts;
- Pedestrian and vehicular movement and access;
- Visual impacts;
- Public domain and landscaping;
- Tree removal;
- Open space and foreshore access;
- Airport link;
- Project timeline and staging; and
- Planning process.

The Applicant has also undertaken engagement with other key stakeholders, including:

- Elected representatives, including Federal Member for Barton, State Member for Rockdale, and Minister for Roads;
- NSW Department of Planning, Housing and Infrastructure;
- Transport for NSW;
- Bayside Council;
- Sydney Airport; and
- Service and utility providers.

Further, the Applicant has undertaken engagement with traditional custodians, elders, and knowledge holders of Bidjigal Country to inform the development of a Connecting with Country framework. The broader Aboriginal community has also been consulted regarding the heritage management of the project throughout its lifespan as part of the Aboriginal Cultural Heritage Assessment Report.

Environmental Impacts and Mitigation Measures

This Environmental Impact Statement provides an assessment of the potential environmental impacts of the Proposal in accordance with the Secretary's Environmental Assessment Requirements issued by the NSW Department of Planning, Housing and Infrastructure. It is accompanied by supporting design documentation and technical assessments that consider the potential impacts as a result of the proposed Concept Masterplan and Early Works.

The environmental impacts assessed include:

- Building height and overshadowing;
- Visual and view impact;
- Design excellence;
- Airport safeguarding;
- Economic impact;
- Traffic and transport;
- Noise and vibration;
- Air quality and odour;
- Hazards and risk;
- Regulatory compliance;
- Ecologically sustainable development;
- Social;
- Biodiversity;
- Aboriginal cultural heritage;
- Non-Aboriginal cultural heritage;
- Water management;
- Flooding;
- Geotechnical;
- Contamination;
- Infrastructure requirements; and
- Public benefits and voluntary planning agreements.

The assessment has found that where there are potential impacts, they can be appropriately mitigated and managed to ensure a suitable and appropriate outcome for the Site. A summary of the environmental assessment is provided in **Section 6.0** of this Environmental Impact Statement.

Conclusion and Justification

Having regard to environmental, economic, and social considerations, the Proposal is justified for the following reasons:

- It is consistent with the *Bayside Local Environmental Plan 2021*, with exception of the proposed variation to the Height of Buildings development standard which is justified as being unreasonable or unnecessary in the circumstances and supported by sufficient environmental planning grounds under a Clause 4.6 Variation Request;
- It meets the statutory requirements of other Environmental Planning Instruments, including applicable State Environmental Planning Policies;
- It is consistent with the objects of the *Environmental Planning and Assessment Act 1979*, specifically promoting the orderly and economic development of land by enabling new logistics and trade-related enterprise floorspace on land with demonstrated capacity directly adjacent to Sydney Airport;
- It is consistent with the strategic planning framework and previous Planning Proposal (PP-2022-1748) outcomes through the provision of new publicly accessible open space and land uses that support the growth of Sydney Airport, as one of Australia's most important trade and economic gateways;
- It enables the delivery of public benefits secured under separate executed Voluntary Planning Agreements with Bayside Council and Transport for NSW, including new publicly accessible open space;
- It supports the future delivery of Pemulwuy Park by Bayside Council, comprising 14-hectares of new public open space that will connect to the associated Cooks River foreshore link;
- It facilitates the future delivery of a new publicly accessible link along the Cooks River foreshore, extending the 'Bay to Bay' cycle link, delivering passive and active recreational uses, and high amenity to the community;
- It is supported by Indicative Reference Schemes which demonstrate suitable built form and urban design outcomes within the proposed building envelopes, supported by Urban Design Guidelines to guide future development;
- It has demonstrated the ability to incorporate proposed land use flexibility, enabling the future development to align with changing market conditions and the highest and best use over the life of the project;
- It results in minor/moderate overshadowing to the future Pemulwuy Park in mid-winter as a result of the proposed height variation, to be minimised through the design of future buildings (subject to future Development Applications);
- It results in acceptable visual and view impact, to be effectively mitigated through incorporation of built form measures in the design of future buildings (subject to future Development Applications);
- It demonstrates that airport safeguarding can be suitably achieved and a 'controlled activity' approval may be issued;
- It confirms that the predicted traffic generation and impacts associated with the Concept Masterplan are consistent with the traffic generation and impacts associated with the previous Planning Proposal (PP-2022-1748) and associated Voluntary Planning Agreements for external public road upgrades;
- It is supported by a Biodiversity Development Assessment Report which assesses and offsets the biodiversity impacts associated with redevelopment of the previous Kogarah Golf Club site (vacated in March 2025);
- It will not result in other adverse environmental impacts, with suitable mitigation measures to be adopted throughout the design and delivery of the project that will minimise any identified impacts;
- It responds to the limited industrial land supply in Eastern Sydney by delivering more intensive and efficient development on a site with demonstrated capacity, subsequently supporting the projected population growth in Eastern Sydney and predicted growth of freight volumes processed at Sydney Airport and Port Botany;
- It reduces the reliance on distribution centres in Western Sydney to process freight ultimately bound for Eastern Sydney where homes and jobs are most concentrated, supporting reduced vehicle trips on the regional road network and reduced travel distances;
- It directly supports the projected growth of Sydney Airport, including forecasted growth in air freight processed from 0.6 million tonnes in 2024 to 1.4 million tonnes in 2045;
- It will have significant economic benefits to the NSW economy, supporting between 1,750 to 2,890 direct ongoing full-time jobs and between \$470 million and \$630 million in direct value-add each year once fully occupied; and
- It is suitable for the Site and in the public interest.

For the reasons above, the State Significant Development Application is considered supportable and appropriate for approval.

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NN.	Detailed Site Investigation (Development Area)	Douglas Partners
OO.	Remediation Action Plan	Douglas Partners
PP.	Service Infrastructure Assessment	Lucid Consulting
QQ.	Preliminary Water Servicing Strategy	AT&L
Under Separate Cover		
	Estimated Development Cost Report	MBM

Glossary

Term	Definition
ABS	<i>Australian Bureau of Statistics</i>
ACM	<i>Asbestos Containing Material</i>
ACHAR	<i>Aboriginal Cultural Heritage Assessment Report</i>
AEP	<i>Annual Exceedance Probability</i>
AHD	<i>Australian Height Datum</i>
AIA	<i>Aeronautical Impact Assessment</i>
AHIMS	<i>Aboriginal Heritage Information Management System</i>
ANEF	<i>Australian Noise Exposure Forecast</i>
APA	<i>APA Group (gas pipeline operator)</i>
APAR	<i>Airports (Protection of Airspace) Regulations</i>
BDAR	<i>Biodiversity Development Assessment Report</i>
BC Act	<i>Biodiversity Conservation Act 2016</i>
BCA	<i>Building Code of Australia</i>
BRA	<i>Building Restricted Area</i>
BTEX	<i>Benzene, Toluene, Ethylbenzene and Xylenes</i>
CEMP	<i>Construction Environmental Management Plan</i>
CEnvP	<i>Certified Environmental Practitioner</i>
CMC	<i>Controlled Modulus Column</i>
CPTMP	<i>Construction Pedestrian Traffic Management Plan</i>
CTMP	<i>Construction Traffic Management Plan</i>
CwC	<i>Connecting with Country</i>
DCP	<i>Development Control Plan</i>
DPHI	<i>NSW Department of Planning, Housing and Infrastructure</i>
DSI	<i>Detailed Site Investigation</i>
EDC	<i>Estimated Development Cost</i>
EIS	<i>Environmental Impact Statement</i>
EPI	<i>Environmental Planning Instrument</i>
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2021</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
ESD	<i>Ecologically Sustainable Development</i>
FSR	<i>Floor Space Ratio</i>
FTE	<i>Full-Time Equivalent</i>
GANSW	<i>Government Architect New South Wales</i>
GFA	<i>Gross Floor Area</i>
ha	<i>hectare</i>
HIPAP	<i>Hazardous Industry Planning Advisory Paper</i>

HRV	<i>Heavy Rigid Vehicle</i>
HV	<i>High Voltage</i>
HVC	<i>High Voltage Customer</i>
JV	<i>Joint Venture</i>
kN	<i>kilonewton</i>
LGA	<i>Local Government Area</i>
MOC	<i>Motorway Operations Complex</i>
MRV	<i>Medium Rigid Vehicle</i>
MW	<i>Megawatt</i>
NASF	<i>National Airports Safeguarding Framework</i>
NCA	<i>Noise Catchment Area</i>
NPfi	<i>Noise Policy for Industry</i>
NVIA	<i>Noise and Vibration Impact Assessment</i>
OLS	<i>Obstacle Limitation Surface</i>
PANS-OPS	<i>Procedures for Air Navigation Services – Aircraft Operations</i>
PHA	<i>Preliminary Hazard Analysis</i>
PMF	<i>Probable Maximum Flood</i>
PP	<i>Planning Proposal</i>
PSNTL	<i>Project Specific Noise Trigger Level</i>
RAP	<i>Remediation Action Plan</i>
RL	<i>Reduced Level</i>
RWY	<i>Runway</i>
SDRP	<i>State Design Review Panel</i>
SEARs	<i>Secretary's Environmental Assessment Requirements</i>
SEPP	<i>State Environmental Planning Policy</i>
SIA	<i>Social Impact Assessment</i>
SMR	<i>Small Rigid Vehicle</i>
SSD	<i>State Significant Development</i>
SSDA	<i>State Significant Development Application</i>
SREP	<i>Sydney Regional Environmental Plan</i>
SWSOOS	<i>Southern and Western Suburbs Ocean Outfall Sewer</i>
TfNSW	<i>Transport for New South Wales</i>
TIA	<i>Transport Impact Assessment</i>
TIFPOP	<i>Terminal Instrument Flight Procedure Obstacle Protection</i>
UST	<i>Underground Storage Tank</i>
VPA	<i>Voluntary Planning Agreement</i>
VVIA	<i>Visual and View Impact Assessment</i>

1.0 Introduction

This Environmental Impact Statement (EIS) has been prepared on behalf of Stockland Development Pty Limited ('Stockland' or 'the Applicant') to accompany a State Significant Development Application (SSDA) (SSD-84467726) for a Concept Masterplan and Early Works (the Proposal) associated with the Kogarah Golf Club Redevelopment located on land identified as 13-19A Marsh Street, Arncliffe (the Site).

The vision for the Kogarah Golf Club Redevelopment is to create a world-class precinct that leverages the site's strategic location adjacent to Sydney Airport and strong transport connections by delivering multi-level logistics development, trade-related enterprise and supporting uses with publicly accessible open space. It seeks to deliver state-of-the-art facilities that will redefine the logistics landscape in Australia, setting new benchmarks for scale, efficiency, sustainability and innovation.

The Proposal seeks consent for an overarching Concept Masterplan that establishes maximum building envelopes, Gross Floor Area (GFA), land uses, and other parameters through Urban Design Guidelines and technical reporting. It also seeks consent for the carrying out of Early Works to facilitate the initial site preparation and infrastructure works required to support future development and publicly accessible open space.

In accordance with Schedule 1 of *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP), the Proposal comprises development for the purposes of 'Warehouse or distribution centres', 'Cultural, recreation and tourist facilities', and 'Data centres' that satisfies the applicable State Significant Development (SSD) criteria. Therefore, the Proposal is declared to be SSD for the purposes of the *Environmental Planning & Assessment Act 1979* (EP&A Act).

A request for project-specific Planning Secretary's Environmental Assessment Requirements (SEARs) was submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI) on 16 May 2025. Accordingly, SEARs and associated advice from relevant stakeholders was issued on 17 June 2025. An administrative amendment to the issued SEARs was requested on 11 May 2026 to amend the site description, with amended SEARs issued on 15 May 2026.

The EIS intends to inform the community and stakeholders about the Proposal, including its social, economic and environmental impacts. It has been prepared in accordance with the requirements of Part 4 of the EP&A Act, Section 175 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation), and the SEARs. It should be read in conjunction with the supporting documentation (see **Appendices**), including SEARs Compliance Table (**Appendix A**) that identifies where the SEARs have been addressed in this EIS and supporting documentation.

1.1 The Applicant

The Applicant's details are presented in **Table 1** below.

Table 1 Applicants Details

Applicant	Stockland Development Pty Limited
ABN	71 000 064 835
Address	Level 25, 133 Castlereagh Street, Sydney NSW 2000

1.2 Overview of the Proposal

The Applicant seeks consent under Division 4.7 'State significant development' of the EP&A Act for the following:

- Concept Masterplan to support the staged delivery of the Kogarah Golf Club Redevelopment, including:
 - Maximum building envelopes, including maximum building heights and minimum building setbacks;
 - Maximum gross floor area up to 343,250m², comprising:
 - 3,250m² of GFA (FSR of 1.25:1) on Lot 31 DP1231486; and
 - 340,000m² of GFA on Lot 100 DP1231954.
 - Conceptual primary land uses, including:
 - Block 1 – Mixed-use and advertising structures;
 - Block 2 – Logistics and mixed-use;

- Block 3A – Logistics;
- Block 3B – Logistics; and
- Block 3C – Logistics and data centre.
- Urban Design Guidelines to guide future development of the built form and public domain; and
- Strategies and mitigation measures to manage potential environmental impacts.
- Early Works to support the future delivery of built form and publicly accessible open space, including:
 - Site preparation works, comprising:
 - Demolition of existing structures;
 - Clearing of existing vegetation;
 - Remediation works; and
 - Bulk earthworks, including ground improvement and flood mitigation works.
 - Site servicing and infrastructure works, including:
 - Construction of the Flora Street East extension consistent with Item 3 of the executed Voluntary Planning Agreement with Bayside Council;
 - Construction of stormwater infrastructure; and
 - Construction and augmentation of service and utility infrastructure as necessary.

For a detailed description of the Proposal, refer to **Section 3.0**.

1.3 Objectives of the Proposal

The overarching objective of the Proposal is to establish a Concept Masterplan for a world-class precinct that leverages the Site's strategic location adjacent to Sydney Airport and strong transport connections, while also facilitating Early Works to enable the initial works required to support future development and publicly accessible open space.

The objectives of the Kogarah Golf Club Redevelopment are as follows:

- Unlock the development of a world-class precinct that benefits from the physical proximity to Sydney Airport and Port Botany, as well as surrounding regional transport network links and recent major investment in road infrastructure by the NSW Government;
- Deliver state-of-the-art facilities that will redefine the logistics landscape in Australia, setting new benchmarks for scale, efficiency, architectural design, sustainability and innovation;
- Create an enriched destination for workers and visitors through the delivery of supporting land uses and open space that will also benefit the wider community and Bayside municipality;
- Preserve flexibility to deliver alternative and supporting land uses in the future to align with market conditions and delivery of the highest and best use over the life of the project;
- Explore a potential future direct connection to Sydney Airport, enabling seamless contemporary freight handling capability that reduces heavy vehicle movements on the surrounding road network;
- Facilitate the creation of new publicly accessible open space, including delivery of a new foreshore link along the Cooks River; and
- Be supported by road infrastructure upgrades to manage future traffic generation from the Site.

1.4 Background

1.4.1 Planning Framework History

In 2004, *Sydney Regional Environmental Plan No 33—Cooks Cove* (SREP 33) was gazetted by the NSW Government to support a technology park and public open space in an area to the immediate west of Sydney Airport referred to as 'Cooks Cove'. While SREP 33 has been since repealed, the provisions largely are retained within Chapter 6 of *State Environmental Planning Policy (Precincts—Eastern Harbour City) 2021* (Eastern City SEPP).

Chapter 6 of the Eastern Harbour City SEPP previously provided the zoning for the Site, with a 270,000m² trade and technology complex accommodating advanced technology and trade related enterprises, serviced offices, hotels and

serviced apartments and commercial support premises previously permissible with consent. It also contemplated road access via the Flora Street / Marsh Street and Gertrude Street / Marsh Street intersections in conjunction with the existing Levey Street access.

The objectives of the 'trade and technology' zone were as follows:

- (a) to encourage economic activity and trade-focussed businesses that benefit directly from, or benefit from a synergy due to, the physical proximity of land within the zone to Sydney Airport and Port Botany, and the excellent transport network links to Sydney's CBD and the Advanced Technology Park at Eveleigh, and*
- (b) to promote the establishment of enterprises that create advanced technology or that manufacture products that utilise advanced technology, and*
- (c) to promote export and other trade-related enterprises that are associated with trade logistics and distribution, just-in-time supply, the movement of perishables, time-sensitive goods processing, and the management of air and sea commerce.*

1.4.2 Planning Proposal (PP-2022-1748)

A Planning Proposal (PP-2022-1748) was submitted by John Boyd Properties for the Kogarah Golf Club Redevelopment site to amend and integrate planning controls into the Bayside LEP 2021. It sought to deliver refreshed planning controls that prioritise land uses which support the adjacent Sydney Airport, as one of Australia's most important trade gateways.

The Planning Proposal was granted Gateway Determination on 5 August 2022 and publicly exhibited between 24 April 2023 and 6 June 2023. It was determined to proceed to finalisation in March 2024, with the amendments to the Bayside LEP 2021 gazetted under *Bayside Local Environmental Plan 2021 (Amendment No 6)* on 9 May 2025.

The amendments to the Bayside LEP 2021 are described as follows:

- Application of land zones, including:
 - SP4 Enterprise zone to form a development area;
 - RE1 Public Recreation zone to facilitate the future Pemulwuy Park and overland flow path;
 - C2 Environmental Conservation zone to enable the protection and conservation of land, including foreshore; and
 - SP2 Infrastructure zone for land associated with the Marsh Street roadway and permanent Arncliffe Motorway Operations Complex (MOC).
- An overall maximum building height of RL 51m (Lot 100 DP 1231954) graduating down to RL 40m in response to aviation controls in the south, and a maximum building height of 24m (Lot 31 DP 1231486);
- A total GFA of 343,250m², applied through:
 - Lot 31 DP 1231486 – A maximum FSR of 1.25:1 (3,250m²);
 - Lot 100 DP 1231954 – A total floorspace that does not exceed 340,000m² of GFA, inclusive of:
 - A maximum 20,000m² GFA for 'office premises';
 - A maximum 20,000m² GFA for 'hotel or motel accommodation' and 'serviced apartments'; and
 - A maximum 10,000m² GFA for 'shops' and 'food and drink premises'.
- Application of additional permitted uses including 'Trade-related enterprises' (Lot 100 DP1231954) and 'Advertising structures' (Lot 31 DP1231486).

The Land Zoning Map associated with the Planning Proposal is presented in **Figure 1** below.

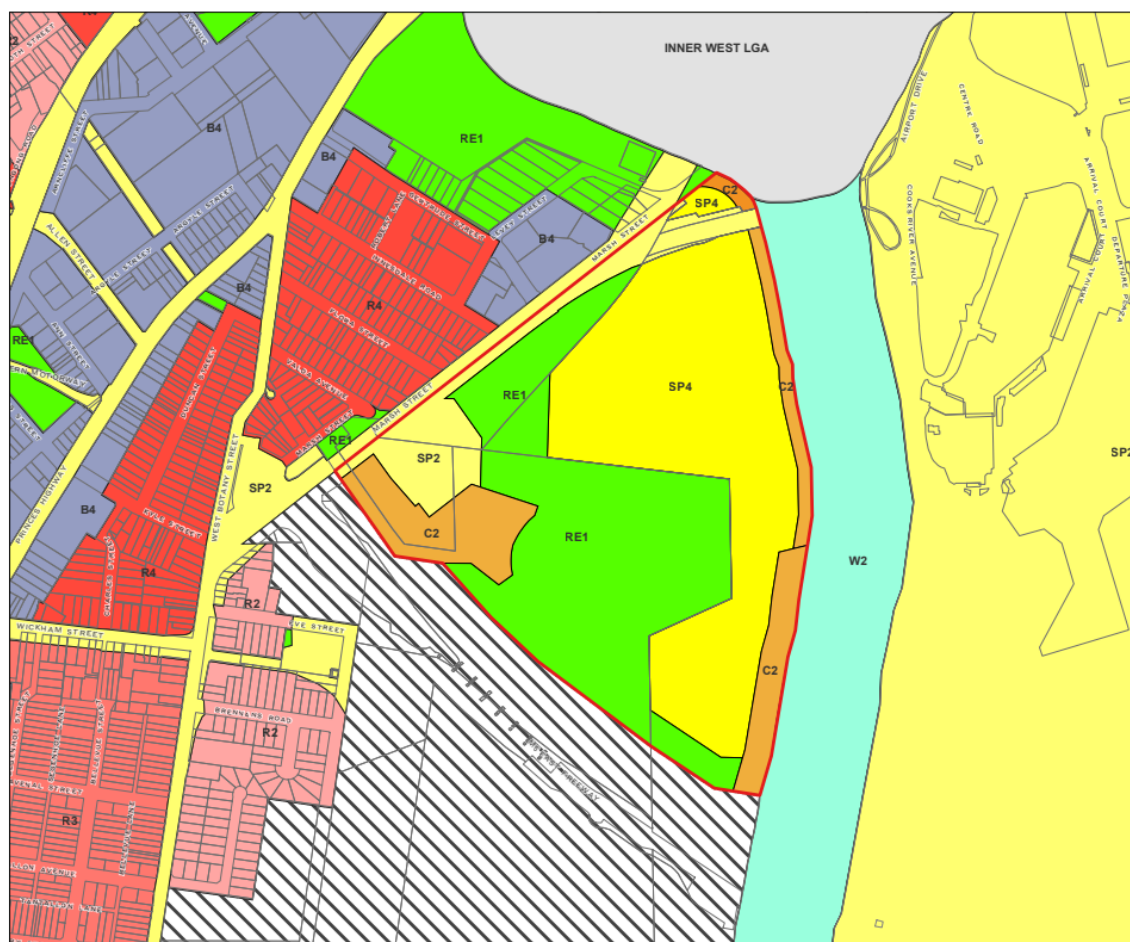
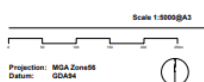
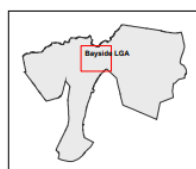
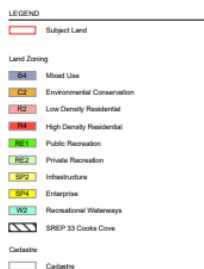


Figure 1 Land Zoning Map – Planning Proposal (PP-2022-1748)

Source: Colliers Urban Planning

The Planning Proposal was accompanied by an indicative masterplan to guide best practice design and the preparation of detailed planning controls which will deliver a precinct which achieves a high level of amenity. The key features of the indicative masterplan included:

- A net development zone of approximately 15ha with up to 343,250m² of Gross Floor Area which comprises of:
 - 290,000m² of multi-level logistics and warehousing;
 - 20,000m² of hotel accommodation and serviced apartments;
 - 22,350m² of commercial office uses; and
 - 10,900m² of retail uses.
- Multi-level logistics with building heights generally up to 5-storeys;
- A retail podium with commercial office and hotel above, up to a total of 12 storeys;
- Built form of a scale and composition which caters for the generation of new jobs;
- A surrounding open space precinct including:
 - A highly activated waterfront including the Fig Tree Plaza outdoor dining and urban park precinct;
 - A contribution to the regional Bay to Bay Regional cycle link, 'Foreshore Walk', including active and passive recreational uses, together with environmental enhancements; and
 - Master planned and Council-owned 'Pemulwuy Park' – with an agreed embellishment outcome of passive open space and environmental enhancements to be delivered in stages post construction of the M6 Stage 1 Motorway.
- Complementary infrastructure to be delivered by way of State and Local VPAs.

The indicative masterplan associated with the Planning Proposal is presented in **Figure 2** below, with the State and Local VPAs discussed in the following sections.



Figure 2 *Indicative Masterplan – Planning Proposal (PP-2022-1748)*

Source: Hassell, edited by Colliers Urban Planning

1.4.3 State Voluntary Planning Agreement (SVPA2024-25)

A State VPA (SVPA2024-25) was executed between John Boyd Properties and Transport for NSW (TfNSW) on 29 January 2025 for State development contributions associated with the Kogarah Golf Club Redevelopment. It comprises road infrastructure works and upgrades along Marsh Street to the north of the Site and a monetary contribution with an estimated total value of approximately \$8.7 million.

The road infrastructure works and upgrades along Marsh Street will provide improved public infrastructure and connectivity, enabling suitable access to the Kogarah Golf Club Redevelopment and future Pemulwuy Park comprising 14 hectares of new public open space. It includes construction of a new signalised intersection at Gertrude Street / Marsh Street, removal of existing traffic signals at Innesdale Road / Marsh Street and enhancement to the existing Flora Street / Marsh Street signalised intersection.

The development contributions under the executed State VPA with TfNSW are described in **Table 2** and depicted in the Indicative Works Plan presented in **Figure 3**.

Table 2 *Development Contributions Summary – State Voluntary Planning Agreement (SVPA2024-25)*

Item	Name	Description	Timing (Due Date)
1	Marsh Street/Gertrude Street Intersection enhancement	• Creation of dual right turn bays into Gertrude Street East and Gertrude Street Extension; • Construction of Marsh Street deceleration lane to permit left turn in Gertrude Street East; • Creation of Left in and left out only to/from Marsh Street at Innesdale Road; • A new pedestrian crossing across Marsh Street; and • Ancillary works to pedestrian refuge, traffic signals, footpathing and landscaping.	Prior to the issue of the first Occupation Certificate for GFA within the Developer Land arising from the Instrument Change.
2	Marsh Street/Flora Street intersection enhancements	• Modifications to Marsh Street concrete medians to remove northbound right turn bay into existing M6/M8 temporary construction compound and lengthening of southbound right turn bay to M5 Motorway; • Intersection line marking and traffic signal adjustments and new pedestrians crossing; • Construction of extension of northbound right turn bay to Gertrude Street East; • Construction of southbound deceleration/left turn bay to Flora Street East; • Construction of 4 lane connection to Marsh Street intersection (3 westbound and 1 eastbound); and • Ancillary works, including new kerb and gutter, footpaths, required adjustment to Marsh Street east cycleway fencing, signage, lighting, road sheeting and landscaping.	Prior to the issue of the first Occupation Certificate for GFA within the Developer Land arising from the Instrument Change.
3	Flora Street East Extension interface with Arncliffe Motorway Operations Compound	• Works arising from any amendments required to the Arncliffe Motorway Operations Centre for the M6 Stage 1 Project and M8 Motorway Project (Arncliffe MOC) as a result of the development, including relocations of impacted assets and adjustments to utilities, fences, gates, controls and cameras leading to the Arncliffe MOC site; • Works to integrate new Flora Street East road and modifications to the road access arrangements arising from M6 Stage 1 Project to the Arncliffe MOC site; • Construction of road beyond Marsh Street intersection; • Construction of road base, drainage, subsurface utility relocation; and • Ancillary works including new medians, footpaths, line marking, fencing, signage, lighting and landscaping.	Interface Agreement(s) to be entered into prior to the issue of a Construction Certificate for GFA within the Developer Land and prior to the issue of a Construction Certificate for any Works within the Council Land arising from the Instrument Change. Developer works the subject of the Interface Agreement are to be delivered prior to the issue of an Occupation Certificate for GFA within the Developer Land arising from the Instrument Change.
4	Additional southbound right-turn bay storage on Marsh Street at Gertrude Street	• Construction of additional length of west bound right-turn bay storage on Marsh Street and Gertrude Street Intersection in lieu of existing right-turn bay storage at Innesdale Road, including the removal of existing traffic signals at Innesdale	Prior to the issue of the first Occupation Certificate for GFA within the Developer Land

Item	Name	Description	Timing (Due Date)
	intersection / Signalised Intersections	Road and construction of new traffic signals at Gertrude Street; and A 10 year maintenance contribution for each set of new traffic signals or pro-rata contribution in the circumstances of modification of existing signals.	arising from the Instrument Change.
5	Bus Stops	- Northbound and southbound bus stops to the south of Marsh Street/Gertrude Street intersection, including recessed bus bay at the southbound bus stop; and - Southbound with signage, recessed bus bay and shelter. Northbound bus stop signage.	Prior to the issue of the first Occupation Certificate for GFA within the Developer Land arising from the Instrument Change.
6	Monetary Contribution with estimated total value of \$8.7 million	Contribution towards regional or State roads and/or regional or State transport improvements within the Bayside local government area.	Payable in instalments, prior to the issue of each Occupation Certificate for GFA within the Developer Land arising from the Instrument Change.

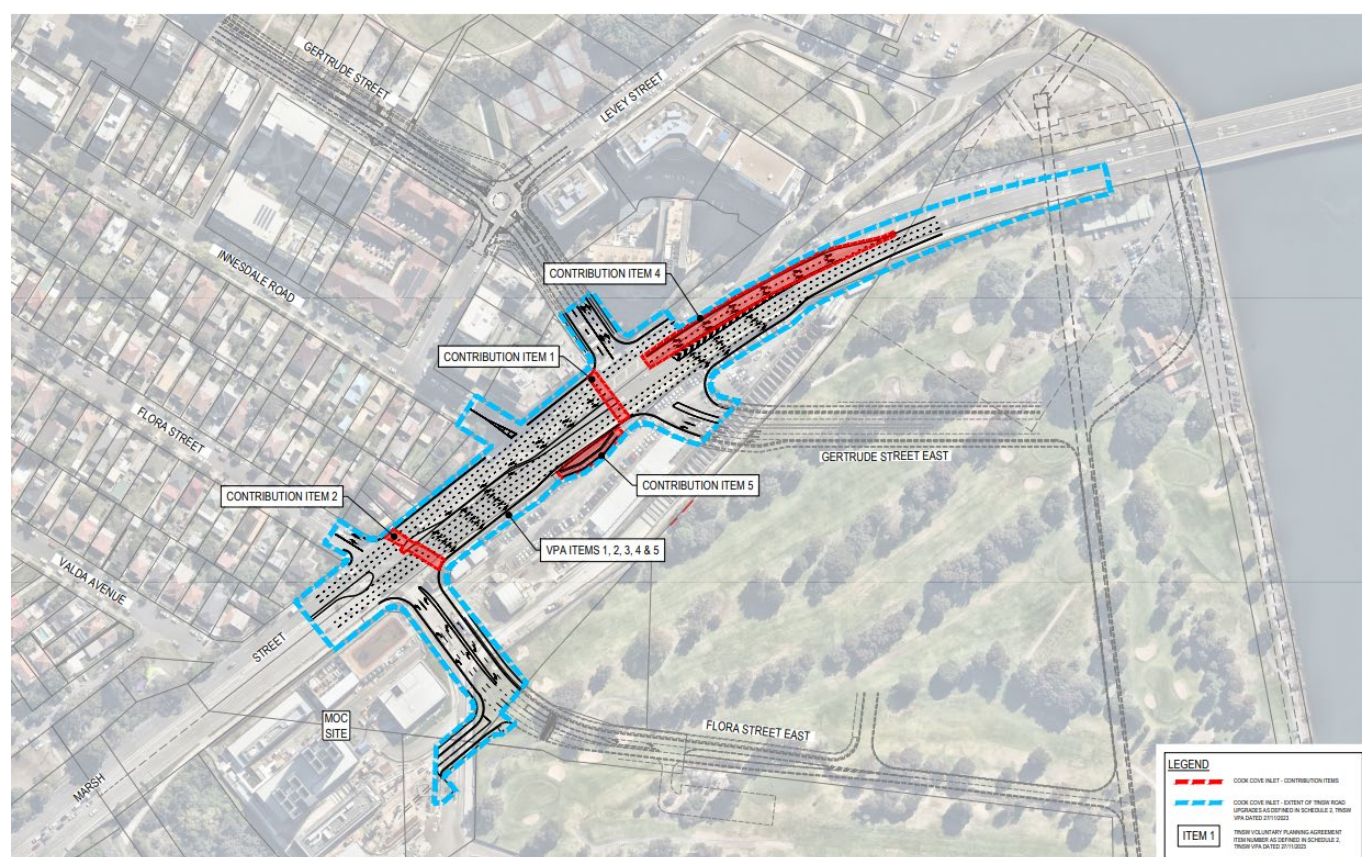


Figure 3 Indicative Roadworks Plan – State Voluntary Planning Agreement (SVPA2024-25)

Source: Enspire

1.4.4 Local Voluntary Planning Agreement

A Local VPA was executed between John Boyd Properties and Bayside Council on 17 March 2025 for local development contributions associated with the Kogarah Golf Club Redevelopment. It includes the carrying out of local road infrastructure works and upgrades, new publicly accessible open space including new foreshore link along the Cooks River, flood mitigation works, dedication of land, and monetary contribution.

The development contributions under the executed Local VPA with Bayside Council are described in **Table 3**. The associated road infrastructure works and upgrades (Item 1-3) are depicted in the Indicative Works Plan presented in **Figure 4** and subject land dedicated illustrated in the Draft Subdivision Plan presented in **Figure 5**.

Table 3 *Development Contributions Summary – Local Voluntary Planning Agreement*

Item	Name	Description	Timing (Due Date)
Carrying out of Work			
1	Gertrude Street extension and upgrade	- Construction of extension of Gertrude Street between Marsh Street and Levey Street; - Construction of a new roundabout and kerb realignment at the intersection of Gertrude Street and Levey Street; and - Widening of Gertrude Street northside between Princes Highway and Levey Street.	Prior to the earlier of the Sunset Date and the issue of the first Occupation Certificate for development creating new GFA within the Developer Land arising from the Instrument Change.
2	Extension of Gertrude Street East	Construction of the extension of Gertrude Street East. The extension located on Lot 14 will be a private road with the benefit of a right of carriage way and right of foot way.	
3	Extension of Flora Street East	Construction of the extension of Flora Street East.	
4	Public open space – Cooks River Foreshore	- Construction of publicly accessible shared pathway and associated hard and soft landscaping; - Capping and protection of ethane gas pipeline; and - Sea wall demolition and construction.	Prior to the earlier of the Sunset Date and the issue of the first Occupation Certificate for development creating new GFA within the Developer Land arising from the Instrument Change. 50% by Value of Contribution of these works are to be delivered prior to the Hold Point.
5	Publicly accessible open space – Fig Tree Plaza	Construction and embellishment of publicly accessible open space and associated hard and soft landscaping.	Prior to the earlier of the Sunset Date and the issue of any Occupation Certificate for GFA for the last building in the Development arising from the Instrument Change but subject to clause 28.10.
6	Flood mitigation works – Pemulwuy Park	Construction and delivery of necessary landform contouring works and any necessary culverts under the road infrastructure.	Prior to the earlier of the Sunset Date and the issue of any Occupation Certificate for GFA for the last building in the Development arising from the Instrument Change, but subject to clause 28.10. 50% by monetary value of these works are to be delivered prior to the Hold Point, but subject to clause 28.10.
7	Pemulwuy Park – embellishment	- Construction and base level embellishment of publicly accessible open space; and - Construction of a single pedestrian/cycle pathway to connect the foreshore footpath to Pemulwuy Park.	Prior to the earlier of the Sunset Date and the issue of any Occupation Certificate for GFA for the last building in the Development arising from the Instrument Change but subject to clause 28.10.
Dedication of Land			
8	Open space and recreation	Dedication to the council free of cost to the council not less than 0.3ha of land as public open space.	Prior to the earlier of the completion of the Work that is located on the proposed lot or prior to the Sunset Date or Hold Point, subject to clause 9.8.

Item	Name	Description	Timing (Due Date)
9	Public road	Dedication to Council part of the Flora Street East Extension that comprises part of the development land.	Earlier of the completion of the Work that is located on the proposed lot or prior to the earlier of the Sunset Date or: - the issue of an Occupation Certificate for development within the area known as Block 3C of the Developer Land arising from the Instrument Change; and - the Hold Point, but, subject to clause 9.8.
10	Open space and recreation	Dedication of not less than 0.7ha of land as public open space.	Earlier of the completion of the Cooks River Foreshore Work contemplated by Item 4 or prior to the issue of any Occupation Certificate of the last building in the last stage of the Development, subject to clause 9.8, or prior to the Sunset Date.
Monetary Contribution			
11	Pemulwuy Park, Riverine Park and active transport links	The Developer is to pay to the Council a monetary contribution of \$15,044,860 (subject to indexation).	- The Developer is to be pay the Council \$1,000,000 by the date that is 12 months from the date that the Instrument Change becomes effective under section 3.24(5) of the Act; - The remaining \$14,044,860 is to be paid in instalments in accordance with clause 7 and 8, provided that 80% of such balance must be paid by the earlier of the Hold Point or the Sunset Date.
Foreshore Easement			
12	Public open space – Cooks River Foreshore	Registration of the Foreshore Easement on the title to the developer Land in relation to the Foreshore works.	Easement to be granted prior to the Hold Point. Public access to be provided upon the earlier of the Sunset Date and the final Occupation Certificate for the Development.

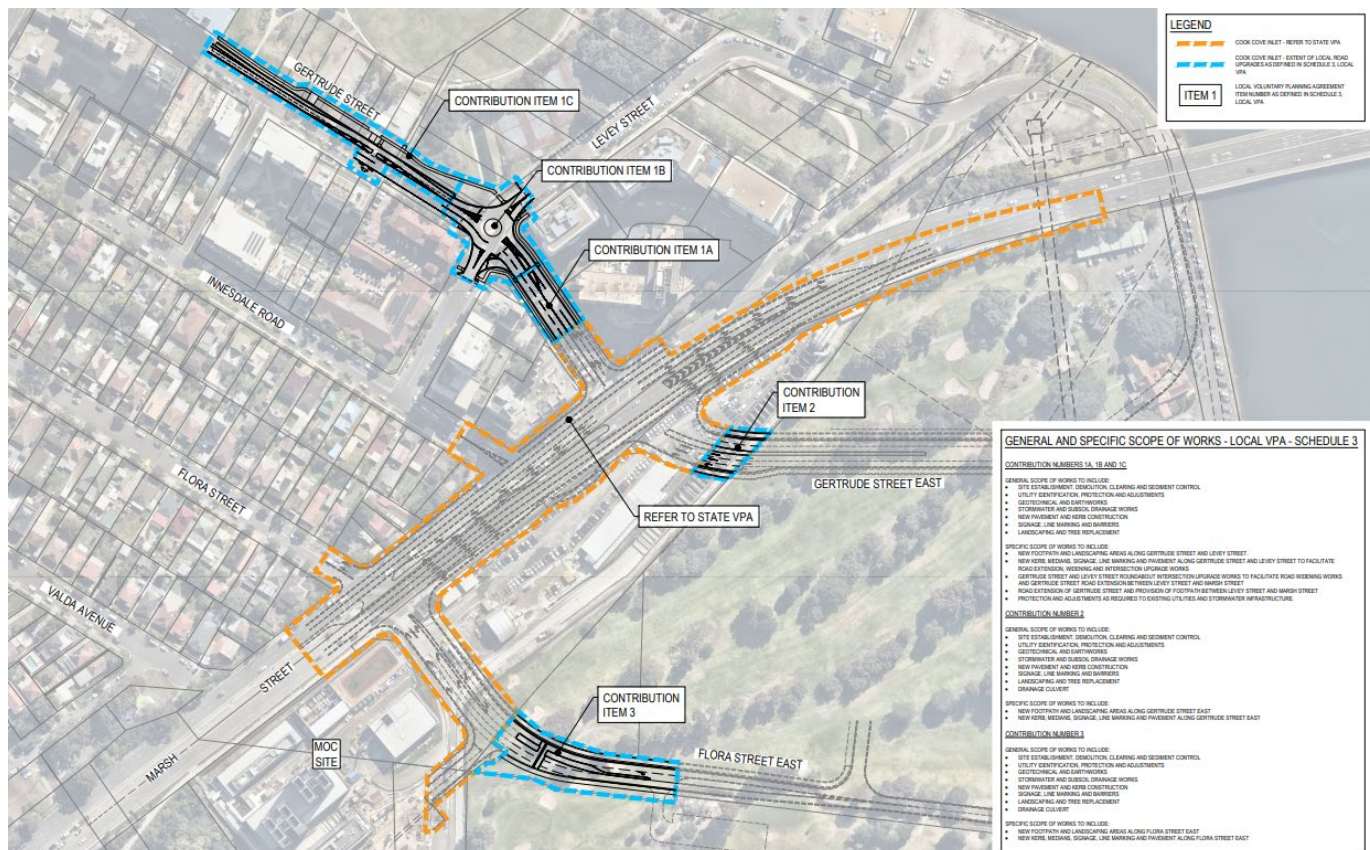


Figure 4 Indicative Roadworks Plan – Local Voluntary Planning Agreement

Source: Enspire

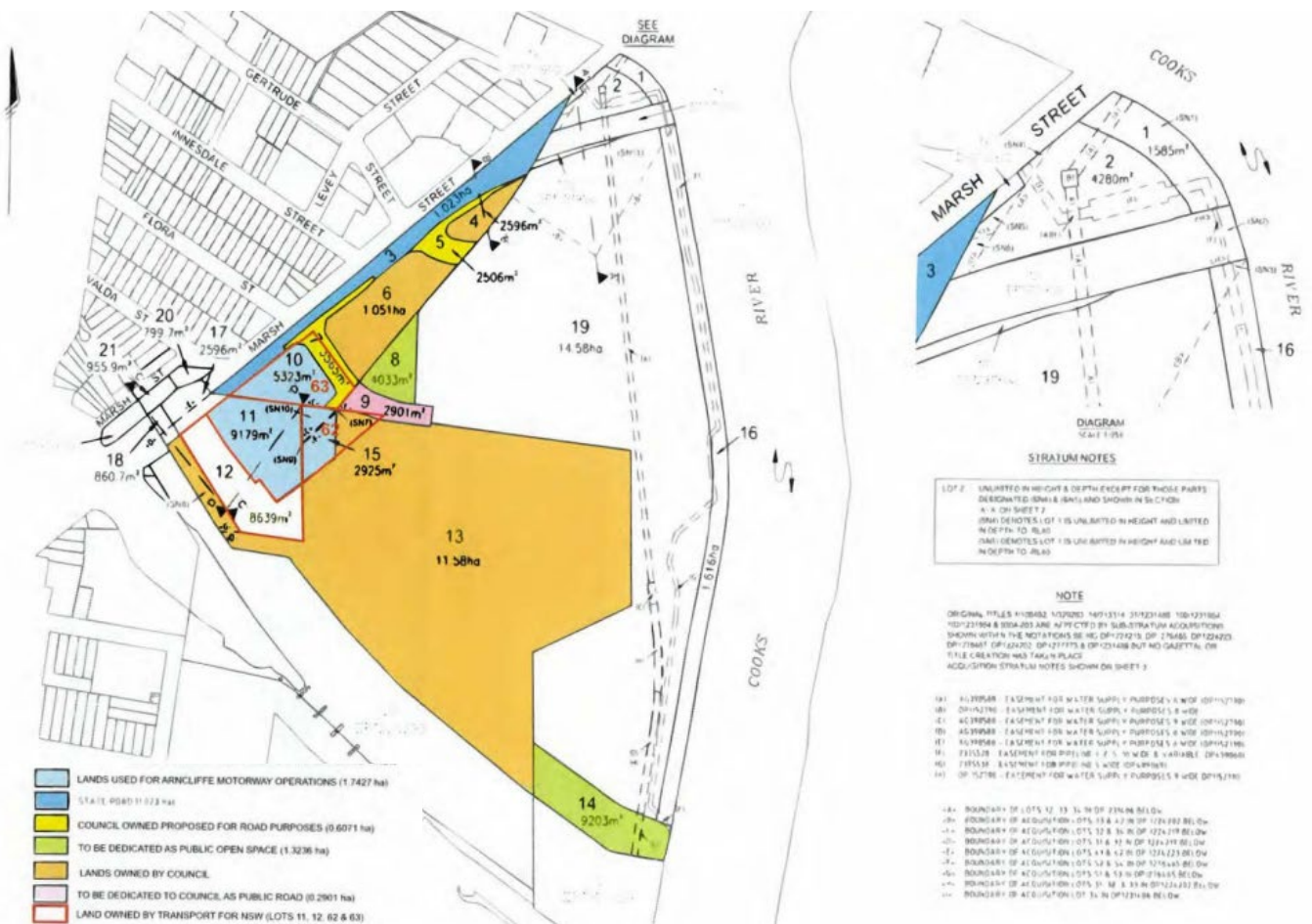


Figure 5 Draft Subdivision Plan – Local Voluntary Planning Agreement

Source: RPS Group

1.4.5 Joint Venture

Following gazettal of the Planning Proposal (PP-2022-1748), Stockland has entered a Joint Venture (JV) with John Boyd Properties for delivery of the Kogarah Golf Club Redevelopment. The JV will enable the effective development and future management of the strategically significant site for a world-class precinct by combining Stockland's extensive experience in large-scale industrial development and John Boyd Properties deep local knowledge and long-term vision for the Site.

1.5 Related Approvals

1.5.1 External Roadworks Development Application

A Development Application (DA) (DA-2026/50) for external public road upgrades established under the executed VPAs was lodged with Bayside Council on 13 March 2026 and is currently under assessment. The Applicant is seeking to deliver the external public road upgrades as soon as practical to enable suitable access that supports the orderly delivery of the Kogarah Golf Club Redevelopment and future Pemulwuy Park.

The DA seeks consent for the carrying out of roadworks along Marsh Street and Gertrude Street, consistent with the works described in Item 1-5 of the State VPA and Item 1-2 of the Local VPA, with Item 3 of the Local VPA subject to this SSDA. Specifically, the External Roadworks DA seeks development consent for the following:

- Site preparation and establishment works;
- Construction of an extension and upgrades to Gertrude Street, including;
 - Extension of Gertrude Street between Marsh Street and Levey Street;
 - A new roundabout and kerb realignment at the intersection of Gertrude Street / Levey Street;
 - Widening of Gertrude Street between Levey Street and the Princes Highway; and
 - Ancillary works, including a footpaths and landscaping.
- Construction of a new signalised intersection at Marsh Street / Gertrude Street, including:
 - Dual right turn bays in both directions on Marsh Street;
 - A new dedicated left-turn lane into Gertrude Street east from Marsh Street;
 - New pedestrian crossings across Marsh Street and Gertrude Street;
 - Bus stops to the south of the Marsh Street / Gertrude Street intersection, including recessed bus bay and shelter (northbound) and signage only (southbound); and
 - Ancillary works, including a pedestrian refuge, traffic signals, footpaths and landscaping.
- Removal of existing traffic signals at Marsh Street / Innesdale Road, including left-in and left-out only turning restrictions to/from Marsh Street at Innesdale Road;
- Construction of enhancements to the existing Marsh Street / Flora Street signalised intersection, including:
 - Modifications to existing concrete medians to remove the right-turn lane into the M6 construction compound, lengthening of the southbound right turn bay to the M5 Motorway, and extension of the northbound right-turn bay to Gertrude Street east;
 - Intersection line marking, traffic signal adjustments and new pedestrian crossing across Marsh Street (eastern approach);
 - A new dedicated left-turn lane to Flora Street east from Marsh Street;
 - Four (4) lanes connecting Flora Street east to Marsh Street; and
 - Ancillary works, including new kerb and gutter, footpaths, adjustment to Marsh Street east cycleway fencing, signage, lighting, road sheeting and landscaping.
- Construction of a new Flora Street east extension interface with the Arncliffe Motorway Operations Complex, including:
 - Works arising from any amendments to the Arncliffe MOC for the M6 Stage 1 and M8 Motorway projects;
 - Works to integrate Flora Street east and modifications to the road access arrangements arising from M6 Stage 1 Project to the Arncliffe MOC;
 - Road connection from the Marsh Street intersection;
 - Construction of road base, drainage, subsurface utility relocation; and

- Ancillary works, including new medians, footpaths, line marking, fencing, signage, lighting and landscaping.
- Retention or replacement of existing trees;
- Relocation and installation of stormwater infrastructure;
- Relocation and augmentation of services and utilities (as required); and
- Temporary construction compounds for the storage of construction materials and equipment.

The proposed external roadworks along Marsh Street and Gertrude Street are depicted in **Figure 6** and **Figure 7** below.

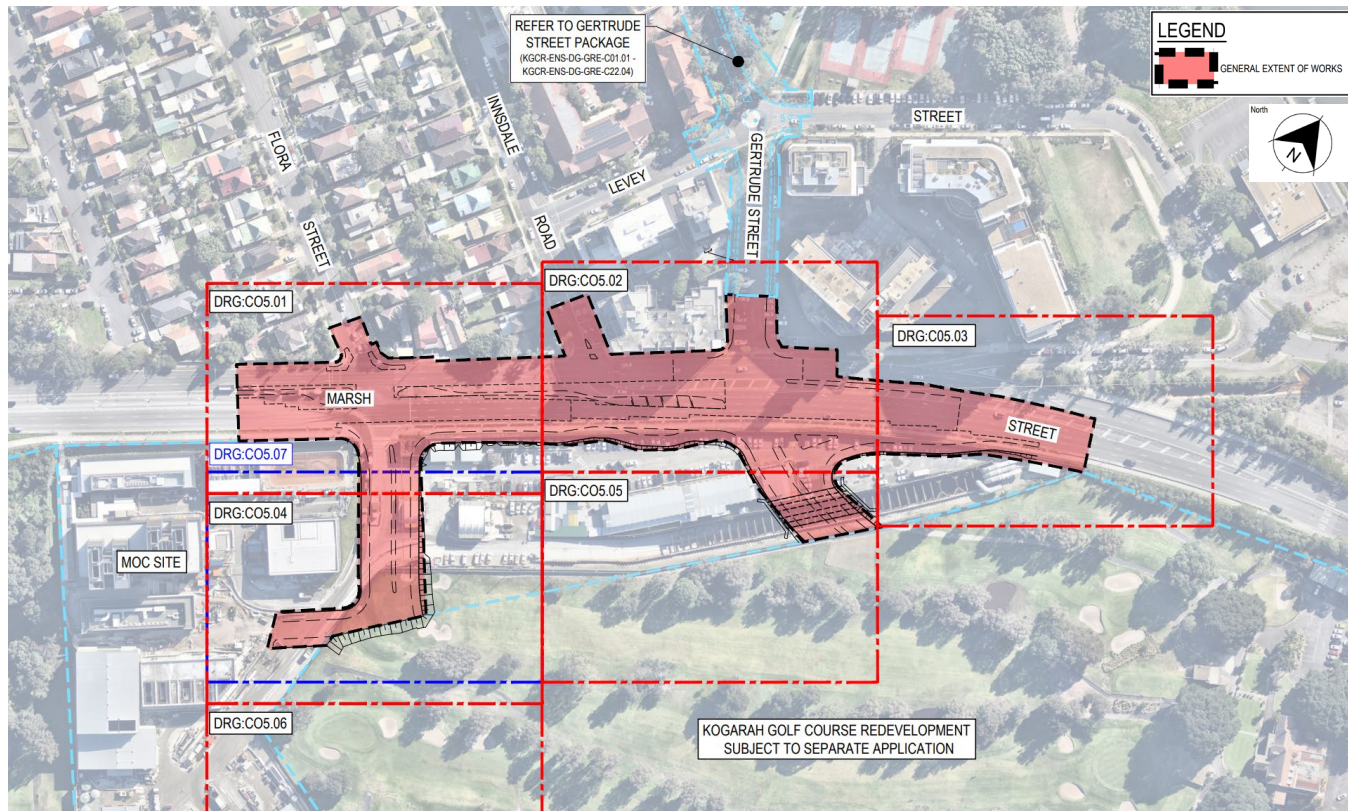


Figure 6 External Roadworks DA Extent Plan – Marsh Street

Source: Enspire

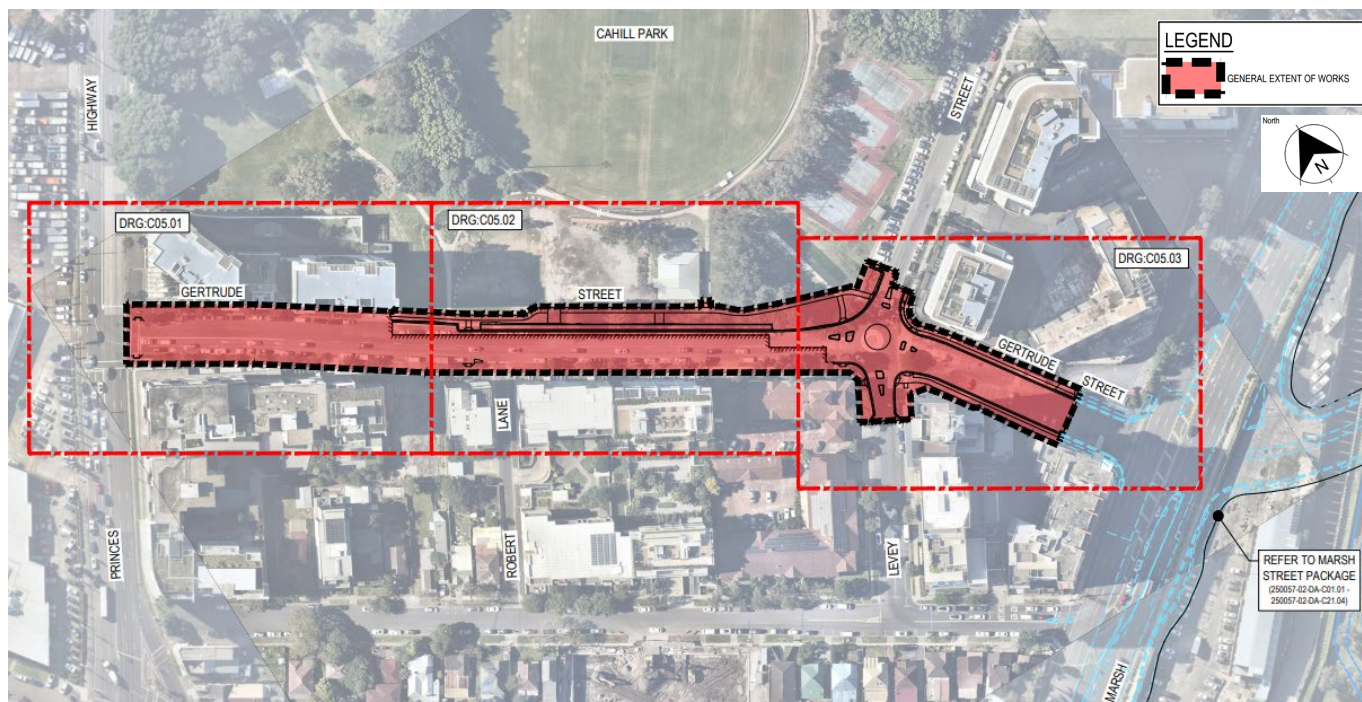


Figure 7 External Roadworks DA Extent Plan – Gertrude Street

Source: Enspire

2.0 Strategic Context

This section identifies key strategic matters relevant to the assessment of the Proposal, including the Site's features, location context, strategic context and other development in the surrounding area. It also provides an analysis of feasible alternatives that were considered in light of the Proposal's objectives.

2.1 Site Location and Context

The Site is situated within the Bayside Local Government Area (LGA) to the immediate west of the Cooks River and Sydney Airport, located approximately 6km west of Port Botany and 10km south of the Sydney Central Business District (CBD). It is strategically located along Marsh Street, providing convenient direct access to the M5 Motorway and Airport Drive, connecting directly to Sydney Airport and St Peters Interchange (M8 Motorway).

There are several railway stations in proximity to the Site, including Wolli Creek, Arncliffe and the Sydney International Airport Terminal ranging from 700m and 1.1km in distance from the Site. It includes an approximate 950m frontage to the Cooks River and is positioned between key public open space areas along the Cooks River, including Tempe Recreation Reserve and Cahill Park to the north and Barton Park to the south.

The Site's location and surrounding context is illustrated in **Figure 8** below.



Figure 8 Site Location and Context Map

Source: Nearmap, edited by Colliers Urban Planning

2.2 Key Features of Site and Surrounds

2.2.1 Site Description

The Site is identified as 13-19A Marsh Street, Arncliffe, comprising land associated with nine (9) allotments and a total area of approximately 32 hectares. The existing uses include the previous Kogarah Golf Club (vacated in March 2025) and the temporary M6 Motorway Stage 1 construction compound.

The development area represents Lot 31 DP1231486 and Lot 100 DP1231954, excluding land subject to future dedication to Bayside Council (refer to **Section 1.4.4**). It comprises an area of approximately 16.7 hectares and is zoned SP4 Enterprise and C2 Environmental Conservation under the Bayside LEP 2021.

The extent of the Site and development area is depicted in **Figure 9** below, and described in **Table 4** following.



Figure 9 *Site Aerial Map*

Source: Nearmap, edited by Colliers Urban Planning

Table 4 *Site Description*

Lot / DP	Address	Ownership
Lot 31 DP1231486	19 Marsh Street, Arncliffe	Cook Cove Nominees No 1 Pty Ltd as trustee of Cook Cove Property Trust 1
Lot 100 DP1231954	19A Marsh Street, Arncliffe	Cook Cove Nominees No 2 Pty Ltd as trustee of Cook Cove Property Trust 2
Lot 60 DP1301057	13 Marsh Street, Arncliffe	Bayside Council
Lot 61 DP1301057	19 Marsh Street, Arncliffe	
Lot 62 DP1301057	Marsh Street, Arncliffe	Transport for New South Wales
Lot 63 DP1301057	Marsh Street, Arncliffe	

Lot 12 DP570900	Marsh Street, Arncliffe
Lot 102 DP1231954	Marsh Street, Arncliffe
Lot 103 DP1231954	Marsh Street, Arncliffe

2.2.2 Existing Development

The existing development primarily consists of the previous Kogarah Golf Club, a 15-hole course vacated in March 2025. It is accessed via Levey Street underneath the Giovanni Brunetti Bridge, comprising a vehicle height clearance of 3.1m. The golf course represents a highly modified environment with relatively flat topography, gently moulded fairways and greens, separated by strips of vegetation and man-made water bodies. The golf course clubhouse, car park and maintenance facilities are located in the north-east portion of the Site adjacent to the Cooks River.

The existing development also includes dual tunnels associated with the M8 Motorway, with the future dual tunnels associated with the M6 Motorway Stage 1 connecting to the M8 Motorway underneath the Site. A temporary construction compound for the M6 Motorway Stage 1 tunnelling works (previously utilised for the M8 Motorway construction) is located the north-west portion of the Site at ground level.

The temporary construction compound is accessed from the existing Marsh Street / Flora Street signalised intersection. Following completion of the construction works, the land not under TfNSW ownership will be returned to the relevant landowners and the Arncliffe Motorway Operations Complex (MOC) will be expanded to also service the M6 Motorway.

The existing development is depicted in the site photographs presented in **Figure 10** below.



Existing Kogarah Golf Club Entrance facing south



Existing Kogarah Golf Club car park facing west



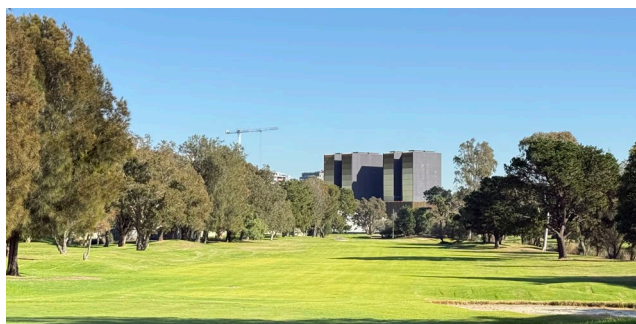
Existing Kogarah Golf Club House facing west



Existing Kogarah Golf Club House facing south



Existing Golf Course facing south



Existing Golf Course facing west

Figure 10 *Site Photographs*

Source: Colliers Urban Planning

2.2.3 Site Characteristics

The key relevant characteristics of the Site are described in **Table 5** below.

Table 5 Site Characteristics

Characteristic	Description
Site History	The history of the Site and surroundings is described as follows: • 1880s – The Site served as an element of the Arncliffe Sewage Farm (night soil depot), being the original termination of Southern and Western Suburbs Ocean Outfall Sewer (SWSOOS); • Early 1900s – Agriculture and market garden uses were established, with continued use for night soil depot; • 1930s – The Bonnie Doon Golf Course was established, and night soil depot were significantly reduced in area, with the SWSOOS extended towards the east; • 1940-50s – The Army and Air Force radio school occupied the Bonnie Doon Golf Course until vacated, where it was left derelict until the Kogarah Golf Club occupied the site in the mid-1950s; • 1960s – The post-war expansion of Sydney Airport led to significant modifications to the Cooks River and Muddy Creek to form the current alignment; • 1970s – The golf course underwent landscaping and earthworks, with Kogarah Golf Club Limited purchasing the freehold element of the golf course in January 1972 from the Commonwealth of Australia; • 1990s – Minor rearrangements occurred with the commencement of construction of the M5 East Motorway to the south-west; • 2000s – The M5 East Motorway was completed, with the Desalination pipeline constructed in the mid-2000s; and • 2010s – Marsh Street was widened and works associated with the M8 Motorway commenced, including a temporary construction facility and permanent infrastructure facilities for the M6 and M8 Motorways. • 2020 – The first stage of the M8 Motorway commenced operation in July 2020 while works on the M6 Motorway Stage 1 commenced. • 2025 – Kogarah Golf Club ceases operations and vacates the Site in March 2025, with refreshed planning controls implemented under the Bayside LEP 2021 in May 2025 to prioritise supporting land uses adjacent to Sydney Airport
Topography	The Site is located on relatively flat terrain with surface levels generally varying between about RL 1m and RL 3 m relative to Australian Height Datum (AHD) with elevated areas up to RL 6 m AHD at the clubhouse and small, localised elevated areas,
Easements	The Site is affected by two (2) key pipeline easements identified in Figure 11 and described as follows: • Sydney Desalination Plant Pipeline – The pipeline runs through the Site in a north-south direction adjacent to the Cooks River from Kurnell located to the south of Botany Bay. The pipe has a 1.8m diameter and sits within an easement approximately 6m wide. • Moombah-Sydney Pipeline – The pipeline contains high pressure ethane gas operated by APA Group (APA) and runs along the eastern boundary of the Site adjacent to the Cooks River. The pipeline easement is generally 5m wide with the pipe located at a depth of 1.2m-2.3m, with a diameter of 225mm nominal. The pipeline easements are also depicted on the Detailed Site Survey prepared by RPS included at Appendix E.

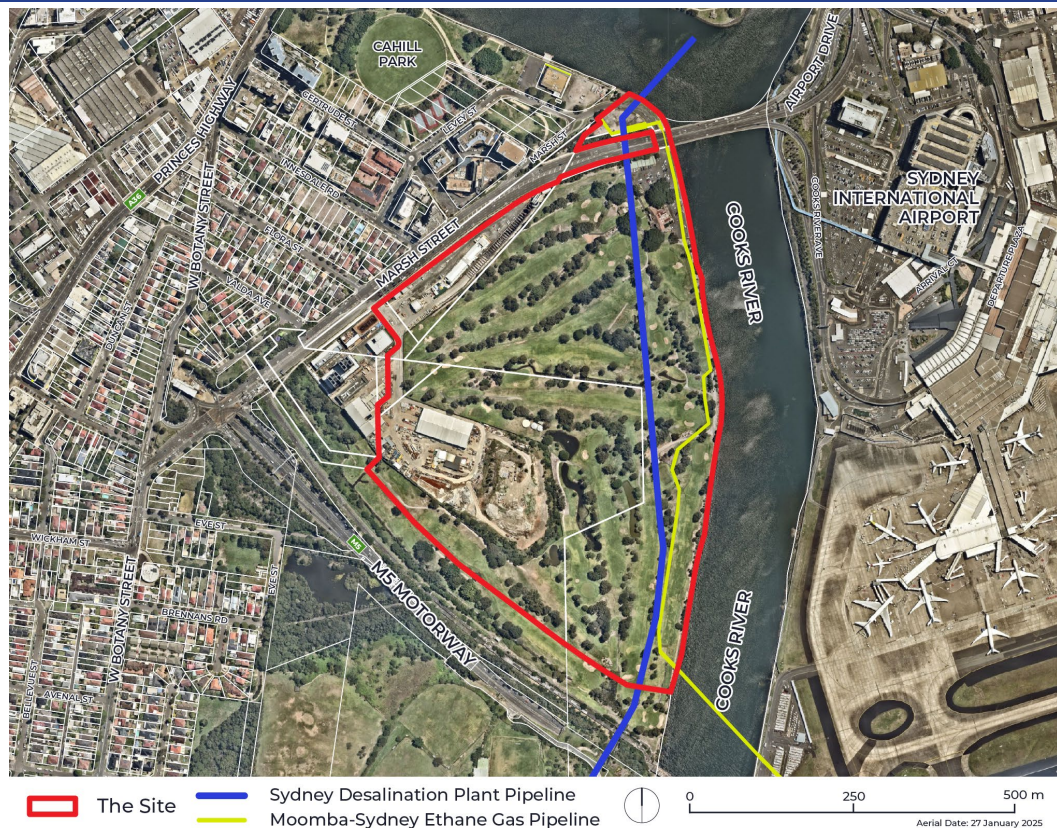


Figure 11 Easement Map

Source: Nearmap, edited by Colliers Urban Planning

Vegetation

The existing vegetation on the Site primarily comprises exotic grassland and vegetation that is generally not naturally occurring, due to the previous development of the Site into a golf course. There are five (5) existing Moreton Bay Fig trees located around the existing golf clubhouse. There are some recolonised communities along the riverbanks including low-lying mangroves and saltmarsh. For further details, refer to **Section 6.13** and Biodiversity Development Assessment Report (**Appendix DD**).

Aboriginal Heritage

There are no identified Aboriginal cultural heritage sites located on the Site under the Aboriginal Heritage Information Management System (AHIMS). The Site is considered to be highly disturbed from historical use and is understood to comprise approximately 0.5m to 1.8m of fill. For further discussion, refer to **Section 6.14** and Aboriginal Cultural Heritage Assessment Report (**Appendix EE**).

Environmental Heritage

The Site has been identified as comprising low archaeological potential, reflective of its use for commercial purposes throughout its historical tenure. It does not contain any heritage items and is not located in a heritage conservation area. The closest heritage item to the Site is the Western Outfall Main Sewer (SWSOOS) (SHR 01647) located to the south-west of the Site parallel to the M5 Motorway corridor.

For further discussion, refer to **Section 6.15** as well as the Historical Heritage Assessment (**Appendix FF**) and Statement of Heritage Impact (**Appendix GG**).

Flooding

The Site is located within the Bonnie Doon/Eve Street sub-catchment of the Cooks River. Due to its low-lying nature and adjacency to the Cooks River, the Site is flood affected during a 1 in 100-year flood event. The previous Planning Proposal (PP-2022-1748) worked extensively to resolve a flood conveyance strategy with authorities which is enshrined as a concept in the Local VPA.

For further details, refer to **Section 6.17** and Flood Impact Risk Assessment (**Appendix II**).

Geotechnical

The Site is identified as being underlain by disturbed terrain and Hawkesbury Sandstone, with the subsurface conditions summarised as follows:

- Fill – Depths of 0.1m to 0.4m;
- Clay and Silt (very soft to firm) – Depths of 1.7m to 7.8m;
- Sand (very loose, loose & medium dense) – Depths of 3.8m to 8.0m;
- Interbedded Clay and Sand – Depths of 8m to 25.2m; and

- **Sandstone Bedrock** – Depths of 5.6m and below.

Groundwater was observed across the development area at depths between 0.4m and 2.5m below ground level.

The Site is considered to comprise ‘mildly’ to ‘severely’ aggressive soil and groundwater conditions and the presence of ‘moderately’ to ‘highly’ saline soils. The Site is also identified within an area of high probability of occurrence of acid sulfate soils from depths of between 1m and 3m below the ground. Geotechnical testing indicates that acid sulfate soils are present at depths between 0.9m and 9m below ground level and likely to be associated with estuarine and alluvial deposits across the Site.

For further discussion, refer to **Section 6.18** as well as the Geotechnical Investigation (**Appendix JJ**), Acid Sulfate Soils Assessment and Management Plan (**Appendix KK**) and Salinity and Erosion Investigation and Management Plan (**Appendix LL**).

Contamination

The Site is identified as containing four (4) Underground Storage Tanks (USTs) and associated Benzene, Toluene, Ethylbenzene And Toluene (BTEXs) impacted soil within the previous golf club car park adjacent to the existing maintenance facility. It is also identified as containing surficial Asbestos Containing Material (ACM).

It has been determined the Site can be made suitable for redevelopment, subject to the implementation of a Remediation Action Plan (RAP). For further discussion, refer to **Section 6.19** as well as the Preliminary Site Investigation (**Appendix MM**), Detailed Site Investigation (**Appendix NN**) and RAP (**Appendix OO**).

Transport and Access

The Site is located in proximity to existing and future major road infrastructure (refer to **Figure 8**), described as follows:

- **M5 Motorway** – Connecting the M1 Motorway and south-west Sydney, including the M7 Motorway and Hume Motorway (M31);
- **Future M6 Motorway (Stage 1)** – Expected to be completed in 2030, it will connect Kogarah (President Avenue and the Princess Highway) to the M8 Motorway;
- **M8 Motorway** – Connecting the M5 Motorway to the St Peters Interchange and M4 Motorway;
- **Sydney Gateway** – Connecting Airport Drive with the St Peters Interchange (M8 Motorway); and
- **Princes Highway (A36)** – Connecting from Kogarah to King Street, accessible via West Botany Street/Wickham Street to the south-west of the Site and Gertrude Street to the north of the Site.

The Site is strategically located in proximity to numerous existing and future transport linkages (refer to **Figure 8**), including the following train stations:

- **Wolli Creek Station** – 800m (approx.) walk from the northernmost edge of the Site;
- **Sydney International Airport Station** – 1km (approx.) walk from northern portion of the Site; and
- **Arncliffe Station** – 1.1km (approx.) walk from the westernmost portion of the Site.

The Site is also located close to several bus routes including Route 348 (Wolli Creek to Bondi Junction), Route 420 (Eastgardens to Burwood via Sydney Airport) and Route 422 (Kogarah to Central Station). Further, there are bicycle and pedestrian paths located along both sides of Marsh Street, with the broader pedestrian and cycle network along the Cooks River including areas around Cahill Park and Tempe Recreation Reserve to the north, and Barton Park to the south.

Surrounding Context and Development

The existing surrounding context of the Site is generally described as including the Cooks River and Sydney Airport to the immediate east, M5 Motorway and Riverine Park to the south, Arncliffe MOC to the immediate west, and primarily low-medium density residential development and Cahill Park bounded by the Princess Highway (A36) to the north-west (refer to **Figure 8**).

Specifically, the surrounding context and development is described as follows:

- **North** – Directly north of the Site at the northernmost point is the Cooks River, with the Novotel Hotel, medium-high density residential development and Cahill Park to the north-west. Low-density residential development to the north-west is currently zoned R4 High Density Residential with a permitted maximum height of 26.5 m which suggests a medium to high density future context. Further north is the Tempe Recreation Reserve and Princess Highway (A36), and Wolli Creek Station and surrounding town centre.
- **East** – Directly east of the Site is the Cooks River with a channel width of approximately 140m, and the Sydney Airport International Terminal and associated development. Further east is the Domestic Terminal and associated development, as well as suburbs of Mascot and Botany which primarily include low-density residential and business park development

- **South** – Directly south of the Site is the SWSOOS and M5 Motorway with Barton and Riverine Parks which contain a mixture of local sporting grounds and open space. The Muddy Creek Boating and Amateur Fishing Association and Kyeemagh is also located south of the Site, and contains a cycleway, the State heritage listed Kyeemagh Market Gardens and low-density buildings. Development to the south-west consists of low-density residential dwellings of Banksia and Arncliffe.
- **West** – Directly west of the Site is the Arncliffe MOC which commenced operation in July 2020, Marsh Street, M5 Motorway, and Eve Street Wetlands. Further west is primarily low-medium density residential development, the Princess Highway (A36) and Arncliffe station and town centre.

For discussion on the future surrounding development, refer to **Section 2.4**

2.3 Strategic Planning Context

The Proposal is consistent with the strategic planning context applying to the Site, as outlined in **Table 6** below.

Table 6 Summary of Alignment with Key Strategic Planning Documents

Strategic Document	Analysis
<i>Greater Sydney Region Plan – A Metropolis of Three Cities</i>	The <i>Greater Sydney Region Plan – A Metropolis of Three Cities</i> (Region Plan) is the overarching strategic plan which currently seeks to shape future development for the Sydney metropolitan area. It identifies key challenges facing Sydney including the increasing population to eight million by 2056, and the requirement of 817,000 new jobs and 725,000 new homes by 2036. The Proposal is consistent with the following directions and objectives of the Region Plan: • Direction 1 – A city supported by infrastructure: - Objective 3 – Infrastructure adapts to meet future needs: The Proposal includes the delivery of infrastructure to future proof the needs of the community with the necessary public works established within the executed VPAs (refer to Section 1.4.3 and 1.4.4). It includes the delivery of a new pedestrian and cycle path along the Cooks River foreshore, creating a new north-south connection along the Cooks River. - Objective 4 – Infrastructure use is optimised: The positioning of the Site will ensure it capitalises on recent major investment in road infrastructure by the State Government, including Sydney Gateway, M8 Motorway, future M6 Motorway, and upgrades to the M4 Motorway and surrounding connections. • Direction 3 – A city for people: - Objective 6 – Services and infrastructure meet communities' changing needs: The Proposal comprises land uses that will support future workers and visitors on the Site, as well as preserving flexibility to deliver other supporting land uses in the future to align with market conditions and delivery of the highest and best use over the life of the project. To support the growing population of the Eastern City District and Bayside LGA, the Proposal will deliver public open space and foreshore improvements which include cycle and pathways. This will contribute to providing additional public space and active transport routes that will service the growing Bayside LGA population and workers at the Site. • Direction 6 – A well-connected city: - Objective 15 – The Eastern, GOP and Western Economic Corridors are better connected and more competitive: The Site is located along the Eastern Economic Corridor which includes Sydney's key trade gateways of Sydney Airport and Port Botany. The Proposal seeks to leverage its proximity to Sydney Airport to create a world-class employment and trade-related enterprise focused precinct comprising state-of-the-art facilities that will redefine the logistics landscape in Australia, setting new benchmarks for scale, efficiency, sustainability and innovation. - Objective 16 – Freight and logistics network is competitive and efficient: The Proposal is located to the immediate west of Sydney Airport and seeks to create a precinct that leverages the Site's strategic location adjacent to Sydney Airport to facilitate a world-class multi-level logistics hub. It will therefore enhance the existing freight network's competitive capabilities and overall efficiency by accommodating potentially novel, future needs of the industry. This would be further strengthened by a potential future bridge connection to Sydney Airport, enabling seamless contemporary freight handling capability that reduces heavy vehicle movements on the surrounding road network.

- **Direction 7 – Jobs and skills for the city:**
 - **Objective 22 – Investment and business activity in centres:** The Proposal will make a significant contribution to the NSW economy through a significant capital investment over the life of the project. It is estimated that the Proposal will support between an estimated 1,750 to 2,890 direct ongoing Full-Time Equivalent (FTE) jobs and between \$470 million and \$630 million in direct value-add each year once complete and fully occupied.
 - **Objective 23 – Industrial and urban services land is planned, retained and managed:** The Proposal seeks to establish a Concept Masterplan for an employment and trade-related enterprise focused precinct and supporting land uses with a maximum GFA up to 343,250m². It promotes the efficient and orderly use of strategically important land by enabling the highest and best use of the Site, consistent with the previous Planning Proposal (PP-2022-1748). It also supports increased logistical efficiencies by providing new industrial floorspace close to Sydney's key gateways, reducing transportation costs for businesses and delivery times to consumers.
- **Direction 8 – A city in its landscape:**
 - **Objective 25 – The coast and waterways are protected and healthier:** The Proposal includes flood mitigation works and construction of a new seawall along the Cooks River in accordance with the executed VPA with Bayside (refer to **Section 1.4.4**) for improved access and enjoyment of the Cooks River.
 - **Objective 31 – Public open space is accessible, protected and enhanced:** The Proposal includes the delivery of new accessible public space in accordance with the executed VPA with Bayside Council (refer to **Section 1.4.4**).

*Our Greater Sydney
2056 – Eastern City
District Plan*

Our *Greater Sydney 2056 – Eastern City District Plan* (District Plan) supports the objectives of the Region Plan through detailed actions and priorities specific to each district. The Proposal is consistent with the following objectives of the District Plan:

- **Direction 1 – A city supported by infrastructure:**
 - **Planning Priority E1 – Planning for a city supported by infrastructure:** The Proposal will be supported by the necessary road infrastructure works and upgrades required to support the future access and traffic generation associated with the Proposal under the executed VPAs (refer to **Section 1.4.3** and **1.4.4**). It will also capitalise on recent major investment in road infrastructure by the State Government, including Sydney Gateway, M8 Motorway, future M6 Motorway, and upgrades to the M4 Motorway and surrounding connections.
- **Direction 3 – A city for people:**
 - **Planning Priority E3 – Providing services and social infrastructure to meet people's changing needs:** The Proposal will provide for the co-ordinated delivery of infrastructure and services to support the Kogarah Golf Club Redevelopment. This will include the provision of road improvements, new pedestrian/cycle and public recreation infrastructure.
- **Direction 7 – Jobs and skills for the city:**
 - **Planning Priority E9 – Growing International trade gateways:** The Site is located to the immediate west of Sydney Airport and in close proximity to Port Botany.
The *Draft Sydney Airport Master Plan 2045* (Sydney Airport Corporation, 2025) identifies that air freight processed by Sydney Airport is forecasted to increase from 0.6 million tonnes per annum (2024) to 1.4 million tonnes per annum (2045). Meanwhile, the *NSW Ports 2063 Masterplan* (NSW Ports, 2023) identifies that shipping container volumes at Port Botany and Port Kembla could increase from 2.8 million per annum (2023) to over 9 million per annum (2063).
The Proposal will support Sydney Airport and Port Botany in catering for the forecasted growth over the coming decades by providing new logistics floorspace in the Eastern Harbour City.
- **Direction 8 – A city in its landscape:**
 - **Planning Priority E14 – Protecting and improving the health and enjoyment of Sydney Harbour and the District's waterways:** The Proposal will direct and manage water flows via an overland flow path outside the development area. It has been designed as a key piece of water management infrastructure to convey overland flow in larger events whilst improving the utility of public open space recreation assets. Further, the Proposal will include a future extension of the Cooks River seawall along the eastern boundary of the Site, supporting improved access and enjoyment of the Cooks River (refer to **Section 1.4.4**).

- **Planning Priority E18 – Delivering high quality open space:** The Proposal includes the delivery of high-quality public open space associated with the executed VPA with Bayside Council, including a publicly accessible shared pathway and associated hard and soft landscaping along the Cooks River foreshore (refer to **Section 1.4.4**).

Draft Sydney Plan

The *Draft Sydney Plan* (Draft Region Plan), released in December 2025, is to replace the current Region Plan and District Plan to provide a more sustainable and balanced approach to the planning of Sydney. It provides a framework for how state and local governments should leverage planning to respond to challenges and opportunities.

The Draft Region Plan outlines 12 key responses, with the following relevant to the Proposal:

- **Response 4: Grow well-located jobs** – The Proposal enables a significant amount of employment floorspace in close proximity to large populations and major transport infrastructure in Eastern Sydney, supporting between an estimated 1,750 to 2,890 direct ongoing FTE jobs once complete and fully occupied. It is positioned immediately adjacent to Sydney Airport and will specifically encourage jobs that directly benefit, or benefit from, the physical proximity to Sydney Airport.
- **Response 5: Align infrastructure to planned growth** – The Proposal will be supported by the necessary road infrastructure works and upgrades required to support the future access and traffic generation associated with the Proposal under the executed VPAs (refer to **Section 1.4.3** and **1.4.4**). It will also capitalise on recent major investment in road infrastructure by the State Government, including Sydney Gateway, M8 Motorway, future M6 Motorway, and upgrades to the M4 Motorway and surrounding connections.
- **Response 7: Grow and connect public open space** – The Proposal includes the delivery of high-quality public open space associated with the executed VPA with Bayside Council, including a publicly accessible shared pathway and associated hard and soft landscaping along the Cooks River foreshore (refer to **Section 1.4.4**).
- **Response 8: Secure an ongoing pipeline of productive industrial lands** – The Proposal facilitates the redevelopment of a large underutilised site which has been rezoned to support industrial land uses and is classified as regionally significant land under the *Draft Statewide Policy for Industrial Lands*. It will support up to 343,250m² of GFA in close proximity to key trade gateways and dense populations. Subsequently, it will facilitate highly productive industrial land that increases the efficiency of the logistical supply chain and reduces transport costs for goods.
- **Response 12: Protect and enhance the natural environment** – The Proposal will direct and manage water flows via an overland flow path outside the development area. It has been designed as a key piece of water management infrastructure to convey overland flow in larger events whilst improving the utility of public open space recreation assets. Further, the Proposal will include a future extension of the Cooks River seawall along the eastern boundary of the Site, supporting improved access and enjoyment of the Cooks River (refer to **Section 1.4.4**).

Draft Statewide Policy for Industrial Lands

The *Draft Statewide Policy for Industrial Lands* (Draft Industrial Lands Policy), released in December 2025, was developed to create a more equitable and coordinated approach to planning, managing and protecting industrial lands in NSW.

It identifies that industrial lands generate a significant portion of NSW's economic output, but a current shortage of industrial land is increasing operational costs associated with rising rents causing businesses to relocate. These costs are often passed on to the consumer, affecting the price of goods and cost of construction and driving economic inflation.

The Draft Industrial Lands Policy introduces a framework for categorisation of industrial lands based on their contribution to economic activity and provides protections for the development and preservation of those lands for industrial purposes.

The developable area of the Site is classified as regionally significant industrial land, which is defined as, "areas of scale that contribute significantly to regional economies and the broader city function or provide infrastructure that supports the region through employment and economic contribution".

The Draft Industrial Lands Policy is underpinned by the following key objectives:

- *Secure, intensify and actively manage industrial lands;*
- *Support a pipeline of development ready industrial lands to meet future needs;*
- *Plan for new industrial lands that are close to transport and freight networks and where land use conflicts can be minimised and mitigated;*

Strategic Document	Analysis
	• Respond to the changing needs of industry, including emerging industries and support intensification, diversification, innovation or transition to new employment opportunities; • Support other government initiatives and programs relating to industry attraction and investment, an efficient freight network, key supply chains, the transformation to net zero, or minimising environmental and social impacts; and • Allow for appropriate alternative uses in industrial lands where they are strategically justified and consistent with predetermined criteria. The Proposal aligns with the Draft Industrial Lands Policy for the following reasons: • It facilitates redevelopment of a large underutilised site which has been rezoned to support industrial land uses; • It is positioned directly adjacent to Sydney Airport and in close proximity to Port Botany, representing nationally significant trade gateways; • It is located in close proximity to several key regional transport routes, including the M5 Motorway and M8 Motorway (via the Sydney Gateway and St Peters Interchange) connecting to the broader motorway network; • It results in significant economic contributions by supporting the projected growth of air freight processed at Sydney Airport, between 1,750 to 2,890 direct ongoing full-time jobs, and between \$470 million and \$630 million in direct value-add each year once fully occupied; • It responds to the limited industrial land supply in Eastern Sydney by delivering more intensive and efficient development on a site with demonstrated capacity, subsequently supporting expected population growth in Eastern Sydney and growth of surrounding nationally significant trade gateways; • It will facilitate highly productive industrial land that increases the efficiency of the logistical supply chain and reduces transport costs for goods; and • It includes alternative uses that provides suitable flexibility, do not restrict the productivity as regionally significant industrial land, and support the adjacent Sydney Airport.
<i>NSW Freight and Ports Plan 2018-2023</i>	The <i>NSW Freight and Ports Plan 2018-2023</i> was established to support the continuity and certainty to plan long-term investments and the State's future growth relating to Freight and the growth of Ports across NSW. The Proposal aligns with the following key objectives of the Plan: • Objective 1 – Economic Growth: Providing confidence and certainty that encourages continued investment in the freight industry to support economic growth; and • Objective 2 – Efficiency, connectivity and access: Improving the efficiency of existing infrastructure and ensuring greater connectivity and access along key freight routes. The Proposal represents a significant capital investment directly adjacent to Sydney Airport and in close proximity to Port Botany for state-of-the-art facilities that will redefine the logistics landscape in Australia, setting new benchmarks for scale, efficiency, sustainability and innovation. It will enhance the overall efficiency and existing freight network's competitive capabilities to support the continued investment and economic growth of the sector.
<i>Future Transport Strategy</i>	The <i>Future Transport Strategy</i> sets out a vision, directions and outcomes framework for moving people in NSW and will guide transport investment over the longer term. The strategy emphasises the key role transport has in supporting new economic and social opportunities. The Proposal is consistent with the Strategy, specifically supporting the following direction: • Strategic Direction E1 – Freight networks and supply chains are efficient and reliable: - E1.1 – Improve freight efficiency, access and reliability on roads; - E1.3 – Optimise the capacity and performance of ports and airports; and - E1.4 – Manage and protect employment lands, key freight and logistics lands and corridors. The Proposal will support a more efficient and reliable freight network by enabling up to 343,250m² of GFA for trade-related enterprise purposes adjacent to Sydney Airport and in close proximity to Port Botany. It will support increased logistical efficiencies by providing new logistics floorspace in Eastern Sydney, reducing transportation costs and delivery times.
<i>South East Sydney Transport Strategy</i>	The <i>South East Sydney Transport Strategy</i> provides a framework to guide to transform transport across South Sydney into 2056. It seeks to support future growth through investment within the transport

Strategic Document	Analysis
	network of south-east Sydney to support the redevelopment, the growth of strategic centres and the continued expansion and efficiency of the Sydney Airport and Port Botany. The Proposal will support the Strategy's objectives through the delivery of the associated road infrastructure (subject to separate approval) to facilitate direct access from Marsh Street in accordance with the executed VPAs (refer to Section 1.4.3 and 1.4.4). The proposed access to Marsh Street will provide direct connectivity to the M5 Motorway to the west and Airport Drive including Sydney Gateway to the east. The Proposal may further contribute to the expansion and efficiency of the Sydney Airport through a direct connection across the Cooks River in the future. It also includes the creation of a new active transport link along the Cooks River foreshore, as well as interconnected pedestrian links, public open space, and supporting land uses.
<i>Bayside West Precinct 2036 Plan</i>	The <i>Bayside West Precinct 2036 Plan</i> (Precinct Plan) establishes nine (9) planning principles for Cooks Cove to ensure that future development meets State Government objectives. These principles have been implemented separately as Ministerial 9.1 Directions under the EP&A Act. The Proposal is consistent with the Plan in that it will facilitate delivery of the following associated infrastructure as part of the broader Kogarah Golf Club Redevelopment: • A key portion of the 'Bay to Bay' pedestrian and cycleway link currently missing along the foreshore of the Cooks River as identified as a key targeted addition to the cycle network; • Dedicated overland flow paths, flood storage and detention basins to mitigate future flooding; • Upgrade of key intersections surrounding the Site including the Gertrude Street extension; • New bus stops along Marsh Street to directly serve Cooks Cove along regional bus routes; and • Enhanced connectivity and usage of active and public transport through new pedestrian connections to regional reserves and railway stations and bus network enhancements.
<i>Future Bayside – Local Strategic Planning Statement 2020</i>	The <i>Bayside Local Strategic Planning Statement 2020</i> (LSPS) establishes the vision for the Bayside LGA and gives effect to the Region and District Plan discussed above. It identifies Cooks Cove as a 'Trade and Technology' and 'Open Space' area which reflects the Site's current zoning under the Chapter 6 of the Eastern City SEPP. The Proposal supports the employment vision and planning priorities for the Bayside LGA established in the LSPS. Specifically, the Proposal will support increased freight handling capabilities at Sydney Airport through the development of a trade-related enterprise focused precinct with a maximum GFA up to 343,250m² immediately adjacent to Sydney Airport and in close proximity to Port Botany.

2.4 Cumulative Impacts

The future surrounding development identified in **Table 7** may have the potential to result in cumulative impacts from the Proposal. An assessment of the cumulative impacts associated with these projects will be considered where relevant as part of the technical assessments associated with the EIS.

Table 7 *Future Surrounding Development*

Details	Description	Status
M6 Motorway Stage 1 Transport for NSW Arncliffe to Kogarah SSI-8931	Construction and operation of a new underground multi-lane road link between the M8 Motorway at Arncliffe and President Avenue at Kogarah, including: • Twin tunnels with entry and exit ramps, an intersection at President Avenue and associated works to upgrade the surrounding road network, and cycle and pedestrian pathways; • Lane markings of two (2) additional lanes in each carriageway of the M8 Motorway tunnels, resulting in four (4) lanes in each carriageway, from the St Peters interchange to the connection with the M6 Motorway Stage 1 tunnels at Arncliffe; and • The construction and operation of a new power line, commencing at Earlwood and ending at Rockdale, to power the twin tunnels between Arncliffe and Kogarah.	Under Construction

Details	Description	Status
External Roadworks DA Stockland Marsh Street and Gertrude Street, Arncliffe and Wolli Creek DA-2026/50	Construction of external roadworks along Marsh Street and Gertrude Street in accordance with the executed VPAs with TfNSW and Bayside Council associated with the Planning Proposal (PP-2022-1748).	Under Assessment
Residential Flat Building 15-37 Innesdale Road, Wolli Creek DA-2022/329	Development of two (2), 9-storey residential flat buildings comprising 76 dwellings, including 15 affordable dwellings with basement car parking.	Under Construction
Residential Flat Building 8-16 Innesdale Road, Wolli Creek SSD-97720476	Development of a residential flat building with a combined podium and two (2) towers at 9-storeys, including 110 dwellings.	Prepare SSDA
Residential Flat Building 137A Princes Highway, Wolli Creek SSD-103606458	Development of a mixed-use development comprising ground floor ice skating facility and 22 residential levels above containing approximately 170 dwellings inc. 26 affordable dwellings.	Prepare SSDA
Mascot Logistics Estate ESR Australia & New Zealand Coward Street and King Street, Mascot SSD-49734709 SSD-59024711 SSD-72441212	Staged delivery of the Mascot Logistics Estate, including: • QF1/2 (SSD-72441212) – Development of two (2) 4-storey (44m) multi-level warehouse facilities including a total GFA of approximately 189,131m², ancillary uses, and heavy vehicle access from Coward Street. • QF3 (SSD-49734709) – Development of a 4-storey (45m) multi-level warehouse facility including a total GFA of 31,266m², ancillary uses, and heavy vehicle access from King Street. • QF4 (SSD-59024711) – Development of a 4-storey (44m) multi-level warehouse facility including a total GFA of 33,085m², ancillary uses, and heavy vehicle access from King Street.	• QF1/2 – Prepare SSDA • QF3 – Approved • QF4 – Approved
Coward Street Multi Level Warehouse Facility Goodman Group 283 Coward Street, Mascot SSD-71774469	Development of a 3-storey (34m) multi-level warehouse facility including a total GFA of approximately 112,700m ² , ancillary uses, and heavy vehicle access from Coward Street.	Prepare SSDA

2.5 Analysis of Alternatives

Through the development of the Proposal, alternative options have been considered by the Applicant in response to the strategic need and objectives for the development of the Site. This includes not undertaking any works on the Site ('do nothing'), proceeding with a different use on the Site, proposing an alternative layout, and proceeding with the Proposal as described in **Section 3.0**.

2.5.1 Do Nothing

A 'do nothing' approach and retention of the existing golf course would provide an undesirable outcome as the Site would remain underutilised and private land, failing to facilitate the future desired character of the Site including associated public benefits.

It would represent a significant missed opportunity for the State and Bayside LGA, failing to capitalise on a large landholding immediately adjacent to Sydney Airport and in close proximity to Port Botany to deliver critical industrial

floorspace in Eastern Sydney on a site with demonstrated capacity for increased intensity and efficiency. It would also fail to support between an estimated 1,750 to 2,890 direct ongoing FTE jobs and between \$470 million and \$630 million in direct value-add each year once complete and fully occupied.

The failure to deliver the Proposal would also result in the failure to deliver the public benefit contributions established under the executed VPAs (refer to **Section 1.4.3** and **1.4.4**). This includes the delivery of a significant provision of publicly accessible open space, including a new public foreshore link along the Cooks River.

Therefore, a 'do nothing' approach is not appropriate and would not represent the orderly and economic use and development of land to its highest and best use following gazettal of the amendments to the Bayside LEP 2021 under the previous Planning Proposal (PP-2022-1748).

2.5.2 Use of the Site for Alternative Purposes

The use of the Site for residential purposes has been determined to be inappropriate, primarily given its position adjacent to Sydney Airport, as one of Australia's most important trade gateways. The provision of appropriate land uses and land use mix was previously considered under the Planning Proposal (PP-2022-1748). It determined that the Site should be primarily used for logistics purposes, with the ability to also accommodate other uses supporting the operation of Sydney Airport such as hotels, serviced apartments, commercial office and retail uses.

Clause 6.20 of the Bayside LEP 2021 establishes a total maximum permitted GFA of 340,000m² on Lot 100 DP1231954 (19A Marsh Street), with the following specific limits:

- Maximum GFA of 20,000m² for office premises;
- Combined maximum GFA of 20,000m² for hotel or motel accommodation and serviced apartments; and
- Combined maximum GFA of 10,000m² for shops and food and drink premises.

On this basis, the use of the Site for alternative purposes outside those considered under the Planning Proposal and subsequent amendments to the Bayside LEP 2021 is not considered appropriate.

It is noted that the proposed Concept Masterplan seeks to enable land use flexibility to facilitate alignment with market conditions and the highest and best use over the life of the project. It includes a logistics focused scenario, as well as an alternative uses scenario that incorporates hotel, commercial office and data centre uses with the primarily logistics use. For further discussion, refer to **Section 3.2.4** and the Architectural Design Report (**Appendix G**).

2.5.3 Alternative Designs and Layout

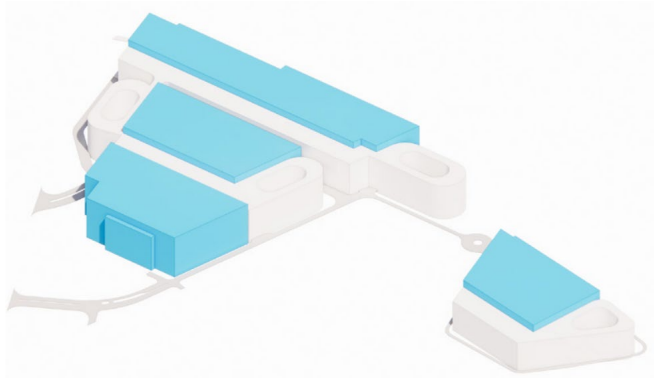
To ensure that the operational efficiency is maximised and any environmental impacts are minimised, a detailed design options analysis has been undertaken to consider potential alternative designs and layouts of the Proposal. It is noted that the design and layout must be consistent with land ownership arrangements and the Bayside LEP 2021.

The options analysis focused on the ability to maximise the efficiency of multi-level logistics development and incorporate alternative uses, with consideration towards the Site's opportunities and constraints. This analysis has helped to inform the proposed Concept Masterplan, including the proposed building envelopes.

The detailed design option analysis identified a selection of key designs and layout's presented in **Figure 12**. The analysis has considered a number of relevant matters, including built form, noise, operational efficiencies, customer acceptance, staging and GFA yield. A detailed breakdown of the options analysis is provided in **Table 8**.

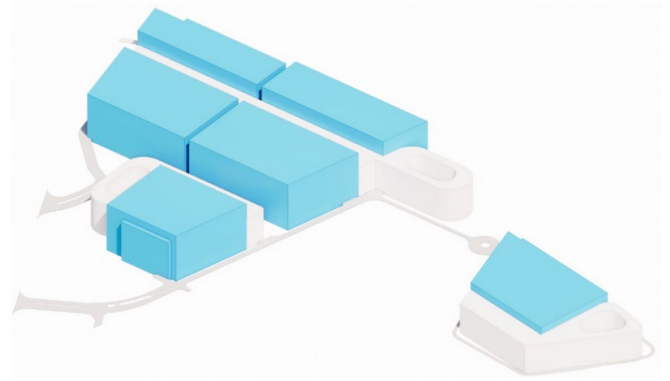
The analysis determines Option C as the most efficient and suitable design and layout. Options A, B and D were not considered ideal due to increased bulk and scale, inability to provide high amenity ancillary office areas, incorporate a feasible staging strategy and achieve the maximum GFA yield under the Bayside LEP 2021.

It is noted that Option C can shift the size of Building 3A and 3B based on market demand for warehouse sizing, which has been incorporated into the proposed Concept Masterplan framework.



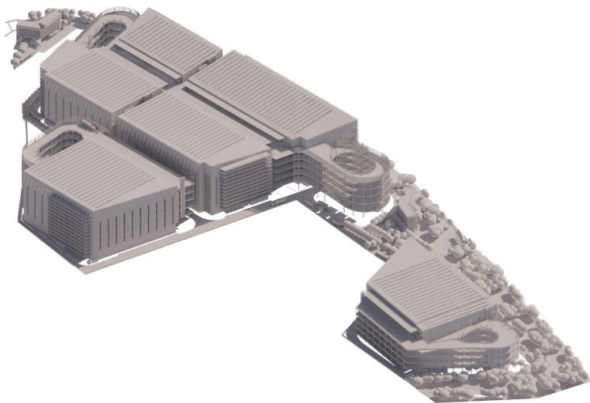
Option A

A large Building 3A comprising a single shared hardstand between two (2) warehouses. A small Building 3B with one (1) warehouse. The northern ramp services both Building 3A and 3B for one-way circulation.



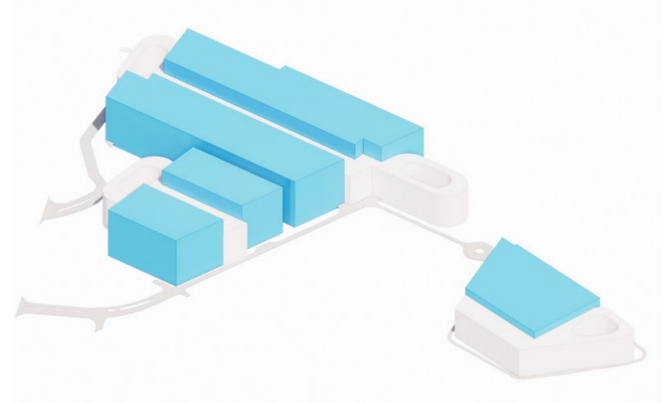
Option B

A large Building 3B comprising a single shared hardstand between two (2) warehouses. A small Building 3A with one (1) warehouse. Both buildings comprising single two-way ramps.



Option C (Preferred)

A balanced option that reduces the size of Building 3B and increases the size of Building 3A compared to Option B. Building 3B includes two (2) ramps for one-way circulation, while Building 3A maintains a singular two-way ramp.



Option D

An alternative to Option C where Building 3A comprises a shared hardstand, while maintaining a singular two-way ramp.

Figure 12 Alternative Design and Layouts – Logistics Scheme

Source: Grimshaw

Table 8 Design and Layout Analysis

Matter	Option A	Option B	Option C	Option D
Height, Bulk and Scale	Significant presence at the corner of Gertrude Street and Marsh Street with a truck ramp between Building 3A and 3B.	Built forms setback from the corner of Gertrude Street and Marsh Street.	Built forms setback from the corner of Gertrude Street and Marsh Street.	Shared hardstands to Building 3A and 3B warehouses provide additional articulation.
Noise	One ramp to the north. Three ramps to the south.	One ramp to the north. Two ramps to the south.	Two ramps to the north. Two ramps to the south.	Two ramps to the north. Two ramps to the south.
Circulation	One-way traffic hardstands to Building 3A and 3B.	Two-way traffic hardstands to all warehouses.	One-way traffic hardstands to Building 3B, Two-way traffic hardstands to Building 3A.	One-way traffic hardstands to Building 3B, Two-way traffic hardstands to Building 3A.
Customer Acceptance	Varied warehouse tenancy sizes. Some warehouse offices landlocked by truck ramps with no outlook. Open hardstand to 3B.	Varied warehouse tenancy sizes. Only one truck ramp to the largest warehouse. Shared hardstand to 3B.	Varied warehouse tenancy sizes. All warehouse offices have an outlook. Shared hardstand to 3B.	Varied warehouse tenancy sizes and standard warehouse depths. Shared hardstand to 3A and 3B.

Staging	Significant pre-commit for first development stage.	Smallest pre-commit for first development stage.	Balanced pre-commit for first development stage vs subsequent stages.	Balanced pre-commit for first development stage vs subsequent stages.
GFA Yield	Does not provide sufficient floor area to meet development needs at five (RL 51) or six (RL 70) levels.	Does not provide sufficient floor area to meet development needs at five (RL 51) or six (RL 70) levels	Provides sufficient floor area to meet development needs at six (RL 70) levels.	Does not provide sufficient floor area to meet development needs at five (RL 51) or six (RL 70) levels.

Source: Grimshaw

Therefore, alternative design and layouts are not considered appropriate for the Proposal on the basis that they fail to best achieve the objectives of the Proposal, maximise the operational efficiency, and minimise environmental impacts.

2.5.4 The Proposal

The Proposal seeks to establish a Concept Masterplan for the Site, locking-in key parameters to support the staged delivery of the Kogarah Golf Club Redevelopment. As outlined above, the use of the Site for alternative purposes or adoption of alternative designs and layouts is not considered appropriate.

Specifically, the Proposal is considered the best outcome for the Site for the following reasons:

- It is consistent with the amendments to the Bayside LEP 2021 associated with the previous Planning Proposal, delivering a precinct that leverages the Site's strategic location adjacent to Sydney Airport to create a world-class multi-level logistics hub;
- It supports a series of primary land uses that preserve flexibility to deliver alternative and supporting land uses in the future to align with future market conditions and highest and best use of the Site over the life of the project; and
- It has been informed by detailed design analysis to support the development of proposed building envelopes that best achieve the objectives of the Proposal, maximise the operational efficiency and minimise environmental impact.

Given the unique opportunities offered by the Site's strategic location and context, this option represents the best outcome for the Site, including a workable development scenario which meets the key objectives for the Proposal.

3.0 The Proposal

3.1 Overview

The Applicant seeks consent under 'Division 4.7 – Stage Significant Development' of the EP&A Act for a Concept Masterplan and Early Works associated with the Kogarah Golf Club Redevelopment.

The Concept Masterplan component seeks to establish maximum building envelopes, GFA, land uses, and other parameters through Urban Design Guidelines and technical reporting. The Early Works component seeks consent for the carrying out of initial site preparation and infrastructure works required to support future development and publicly accessible open space.

Specifically, the Concept & Early Works SSDA seeks consent for the following:

- Concept Masterplan to support the staged delivery of the Kogarah Golf Club Redevelopment, including:
 - Maximum building envelopes, including maximum building heights and minimum building setbacks;
 - Maximum gross floor area up to 343,250m², comprising:
 - 3,250m² of GFA (FSR of 1.25:1) on Lot 31 DP1231486; and
 - 340,000m² of GFA on Lot 100 DP1231954.
 - Conceptual primary land uses, including:
 - Block 1 – Mixed-use and advertising structures;
 - Block 2 – Logistics and mixed-use;
 - Block 3A – Logistics;
 - Block 3B – Logistics; and
 - Block 3C – Logistics and data centre.
 - Urban Design Guidelines to guide future development of the built form and public domain; and
 - Strategies and mitigation measures to manage potential environmental impacts.
- Early Works to support the future delivery of built form and publicly accessible open space, including:
 - Site preparation works, comprising:
 - Demolition of existing structures;
 - Clearing of existing vegetation;
 - Remediation works; and
 - Bulk earthworks, including ground improvement and flood mitigation works.
 - Site servicing and infrastructure works, including:
 - Construction of the Flora Street East extension consistent with Item 3 of the executed Voluntary Planning Agreement with Bayside Council;
 - Construction of stormwater infrastructure; and
 - Construction and augmentation of service and utility infrastructure as necessary.

A detailed description of the proposed Concept Masterplan and Early Works is provided in **Section 3.2** and **Section 3.3** following.

3.2 Concept Masterplan

The proposed Concept Masterplan seeks to support the staged delivery of the Kogarah Golf Club Redevelopment. It establishes the key parameters for future development which will be complied with as part of future Detailed DAs for the development of future buildings, associated infrastructure and publicly accessible open space.

A detailed description of the proposed Concept Masterplan is provided in the following subsections.

3.2.1 Building Envelopes

The Concept Masterplan includes the establishment of building envelopes to identify the locations of future built form, including the maximum building heights and minimum buildings setbacks. The future built form, subject to separate future DAs, must be located within the prescribed envelopes.

The proposed Building Envelope Drawings prepared by Grimshaw are included at **Appendix F**, supported by the Architectural Design Report (**Appendix G**). The proposed building envelopes depicted in **Figure 13** and **Figure 14**, are separated into overarching development 'Blocks' across the Site, being Blocks 1, 2, 3A, 3B and 3C.

The proposed envelopes are aligned with the maximum height permitted under the Bayside LEP 2021, with the exception of Block 2, 3A and 3B which seek to enable a height variation from RL 51m AHD up to RL 70m AHD. The envelopes establish minimum building setbacks that align with land use zoning and internal road corridors.

The proposed envelopes do not incorporate articulation. This will enable the future built form to respond to tenant operational requirements and facilitate outcomes that are capable of achieving design excellence. The Concept Masterplan is supported by Urban Design Guidelines (**Appendix L**) to ensure that design excellence is achieved as part of future Detailed DAs, discussed further in **Section 3.2.6**.

To ensure adequate flexibility for the delivery of future ancillary buildings that support operation of the future built form and publicly accessible open space, the requirement for future buildings to be wholly located within the proposed envelope does not apply to buildings with heights of 12m or less, wind mitigation measures and awnings.

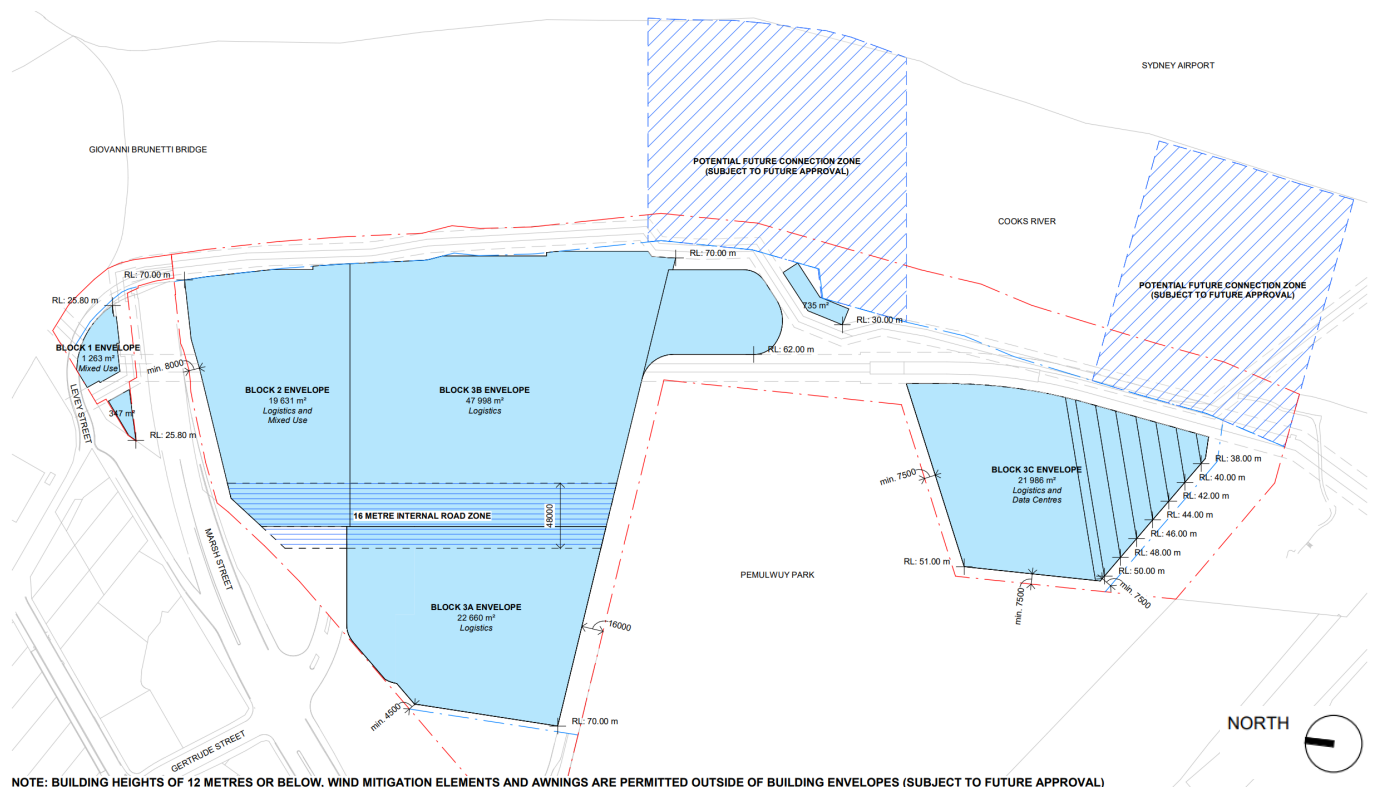


Figure 13 Proposed Building Envelopes – Block Plan

Source: Grimshaw

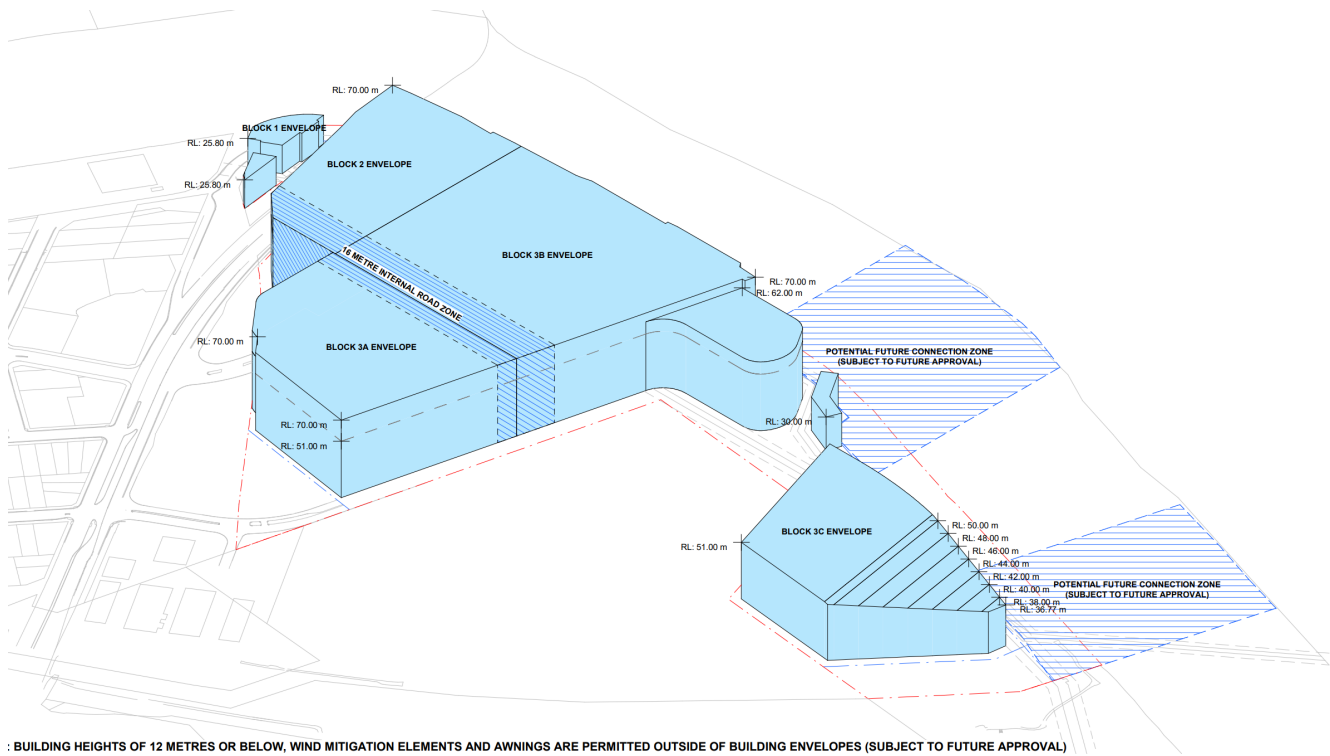


Figure 14 Proposed Building Envelopes – Axonometric view from the South-West

Source: Grimshaw

As illustrated above, the proposed building envelopes include a designated area between Block 3A and 3B for an internal road reserve. It requires an internal north-south road reserve be provided between Block 3A and 3B to facilitate a connection between Gertrude Street East and Flora Street East for vehicular circulation.

The designated internal road reserve is proposed to enable flexibility in the ultimate location of the internal road connection. As depicted in **Figure 15**, the location of the internal road connection will determine the development area split between Blocks 3A and 3B.

The optimal development area split between Block 3A and 3B cannot be determined until a later date with consideration for market demand and tenant specifications at that time. The ultimate location for the road reserve will be determined and assessed as part of a future Detailed DA. It is noted that the Indicative Reference Schemes adopt the 'balanced' option, with the ability to feasibly shift the internal road connection to the east or west.



Figure 15 16m Internal Road Zone Diagram

Source: Grimshaw

3.2.2 Primary Land Uses

The proposed Concept Masterplan seeks to establish primary land uses associated with the identified development blocks. Specifically, it seeks to enable mixed-use development on Block 1, logistics and mixed-use on Block 2, logistics on Block 3A and 3B, and logistics and data centres on Block 3C.

The primary land uses are broadly identified in **Figure 16**, with the specific proposed primary land uses outlined in **Table 9**. It enables primary land use flexibility on Block 2 and Block 3C to support the delivery of the highest and best use at the time of development. The proposed flexibility is depicted and considered as part of the Indicative Reference Schemes discussed in **Section 3.2.4**.

It is noted that the Concept Masterplan does not seek to limit the ability for supporting or ancillary uses to be incorporated as part of the future development on each development block. The incorporation of any supporting or ancillary uses outside of the primary uses would be outlined as part of future Detailed DAs with consideration for the permissible uses under the Bayside LEP 2021.

Table 9 Primary Land Uses – Concept Masterplan

Block	Primary Land Uses		
Block 1	- Hotel or motel accommodation - Serviced apartments - Office Premises	- Food and drink premises - Shops - Artisan food and drink industry	Advertising structures
Block 2	- Warehouse or distribution centre - Trade-related enterprise - Hotel or motel accommodation	- Serviced apartments - Office Premises - Food and drink premises	Shops
Block 3A	Warehouse or distribution centre	Trade-related enterprise	
Block 3B	Warehouse or distribution centre	Trade-related enterprise	
Block 3C	Warehouse or distribution centre	Trade-related enterprise	Data Centre

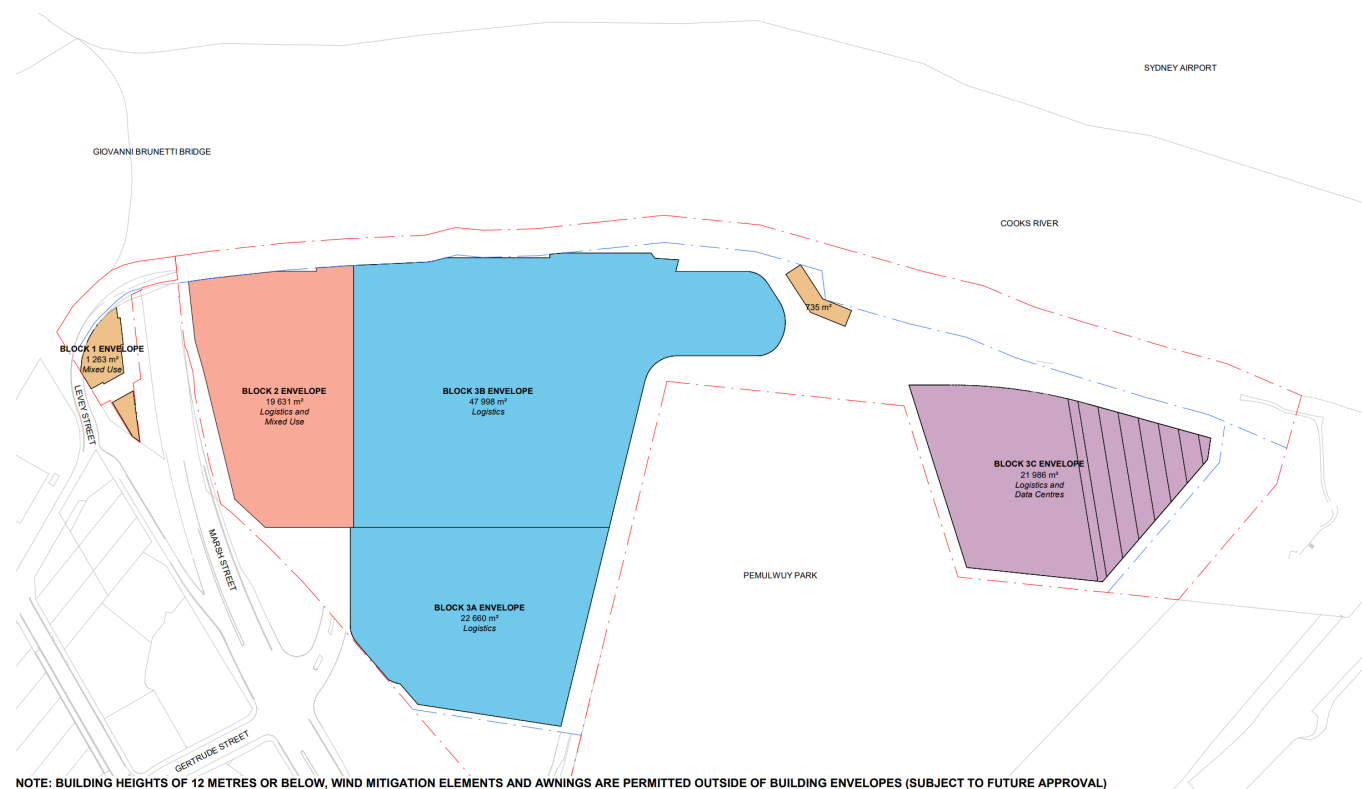


Figure 16 Land Use Plan –Concept Masterplan

Source: Grimshaw

3.2.3 Gross Floor Area

The Concept Masterplan seeks to enable an overall maximum GFA of up to 343,250m² in accordance with the Bayside LEP 2021. This includes 340,000m² of GFA permitted on Lot 100 DP1231954 under Clause 6.20 of the Bayside LEP 2021 and 3,250m² of GFA permitted on Lot 31 DP1231486 under Clause 4.4 of the Bayside LEP 2021.

The specific breakdown of GFA associated with each land use will be detailed and assessed in accordance with the Concept Masterplan and Bayside LEP 2021 as part of future Detailed DAs. The proposed overall maximum GFA has been considered and assessed as part of the Indicative Reference Schemes, discussed in **Section 3.2.4** below.

3.2.4 Indicative Reference Schemes

The Concept Masterplan is supported by Indicative Reference Schemes that present as ‘proof of concepts’ within the proposed planning framework. The schemes demonstrate suitable primary land uses, built form and public domain outcomes that align with the Concept Masterplan vision.

It is noted that the Indicative Reference Schemes are indicative only and the development of future built form and publicly accessible open space will be subject to future Detailed DAs. The Indicative Reference Schemes demonstrate the ability to support different potential outcomes, consistent with the proposed framework under the Concept Masterplan.

Design Principles

The Indicative Reference Schemes are underpinned by design principles to support the vision for a world-class precinct that leverages the site’s strategic location adjacent to Sydney Airport and strong transport connections by delivering multi-level logistics development, trade-related enterprise and supporting uses with publicly accessible open space.

The key principles established by Grimshaw to support the creation of the Indicative Reference Schemes are visualised in **Figure 17** and described as follows:

- **Active Edges** – Offices, stairs, ramps and handstand features will be used to provide architectural expression and active facades when viewed from the streetscape.
- **Connectivity and Access** – New publicly accessible open space will be unlocked through providing connections from the broader Bayside open space network to the new Cooks River foreshore and plaza.
- **Addressing the foreshore and Park** – Buildings are setback from the Cooks River a minimum of 40m to the south and a minimum of 20m to the north. Direct access is also provided from Pemulwuy Park to the foreshore. The road reserves establish functional and safe streetscapes which set the built form appropriately back from surrounding development and open space.
- **Development Staging** – The scale of the proposed precinct will require flexible development staging. The proposed design of the built form and road network has considered the progressive completion of each stage.
- **‘Kit of Parts’ Approach** – Logistics buildings are designed as modular and repeatable to maximise efficiency, sustainability, flexibility and end of life reuse.
- **Flexible and Adaptable** – Internal spaces and offices are arranged to maximise flexibility for future tenants. The offices are located along the longer warehouse elevations to allow for flexible inter-tenancy partition configurations.
- **Efficiency and Functionality** – Truck hardstands are centralised between buildings for operational efficiency and reduce amenity impacts. Truck, car and pedestrian movements are separated. Hardstand widths, ramps sizes, structural layouts are all optimised for efficiency and functionality - within the bounds of carefully considered urban design principles.
- **Adaptability of Future Land Use** – The proposed building envelopes allow for interchangeable building uses.



Figure 17 Architectural Design Principles – Indicative Reference Schemes

Source: Grimshaw

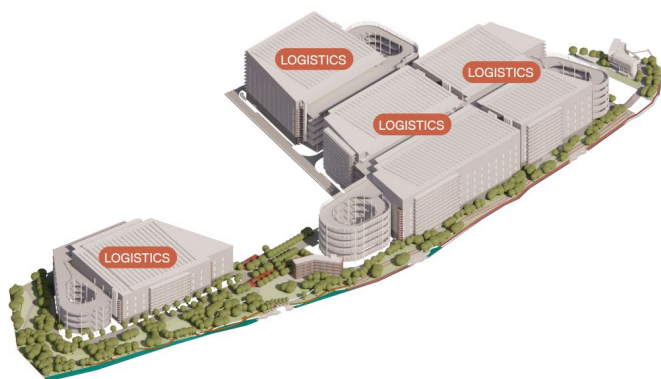
Overview

The Indicative Reference Schemes are detailed in the Architectural Design Report and Architectural Reference Scheme Drawings prepared by Grimshaw, included at **Appendix G** and **H** respectively. The schemes represent ‘proof of concepts’ within the proposed planning framework under the Concept Masterplan. It is reiterated that the Indicative Reference Schemes are indicative only and the development of future built form and publicly accessible open space will be subject to future Detailed DAs.

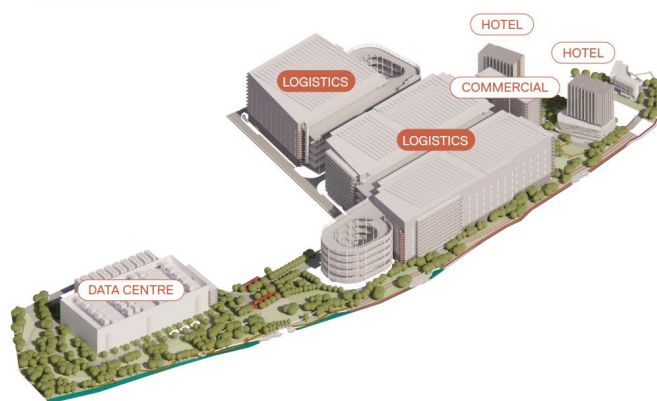
The Indicative Reference Schemes encompass different potential development outcomes enabled by the Concept Masterplan to support the delivery of the highest and best use at the time of redevelopment. This includes a Logistics scheme and Alternative Uses scheme, which facilitate the potential for four (4) different primary land use outcomes across the Site (refer to **Figure 18**). The alternative land use outcomes enabled by the Concept Masterplan include an alternative mixed-use outcome on Block 2 and alternative data centre outcome on Block 3C.

The breakdown of Indicative Reference Schemes is presented in **Figure 18**, supported by a land use matrix in **Table 10** that outlines the associated development yields for each scheme. A detailed description of the overarching Logistics Scheme and Alternative Uses Scheme, as well as the landscape approach, is provided in the following subsections.

LOGISTICS



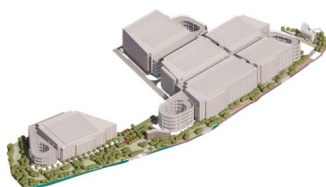
ALTERNATIVE USES



LOGISTICS

REFERENCE SCHEME 01

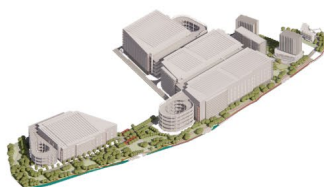
All Logistics



ALTERNATIVE USES

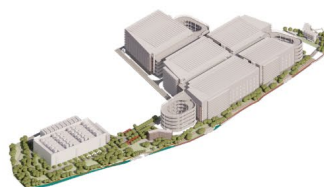
REFERENCE SCHEME 02

Hotel, Commercial and Logistics



REFERENCE SCHEME 03

Data Centre and Logistics



REFERENCE SCHEME 04

Hotel, Commercial, Data Centre and Logistics

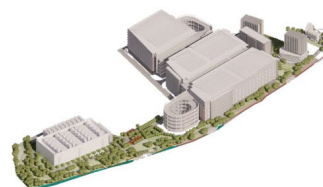


Figure 18 Indicative Reference Schemes – Aerial View from the South-East

Source: Grimshaw

Table 10 Land Use Matrix (Gross Floor Area) – Indicative Reference Schemes

Primary Land Use	Reference Scheme 1 Logistics	Reference Scheme 2 Logistics + Mixed-use	Reference Scheme 3 Logistics + Data Centre	Reference Scheme 4 Logistics + Mixed-use + Data Centre
Lot 31 DP1231486 (Block 1)				
Hotel		1,670m ² (64 keys)		
Commercial		1,260m ²		
F&B / Shops / Artisan F&B		320m ²		
TOTAL		3,250m²		
Lot 100 DP1231954 (Block 2, 3A, 3B, 3C)				
Warehouse	336,200m ²	293,000m ²	276,200m ²	231,600m ²
F&B / Shops	1,950m ²	10,000m ²	1,850m ²	10,000m ²
Hotel	-	20,000m ² (300 keys)	-	20,000m ² (300 keys)
Commercial	1,850m ²	17,000m ²	1,850m ²	17,000m ²
Data Centre	-	-	25,400m ² (80 MW)	25,400m ² (80 MW)
TOTAL	340,000m²	340,000m²	305,300m²	304,000m²

Logistics Scheme

The Logistics scheme represents an indicative outcome for a primarily logistics scenario across the precinct, supported by a mixed-use outcome on Block 1. It demonstrates the achievement of 343,250m² of total GFA, including 336,200m² of warehouse GFA that maximises the ability for the redevelopment to support the forecasted growth in freight volumes at Sydney Airport and Port Botany.

Block 1 comprises a mixed-use outcome to support and enhance the redevelopment and surrounding development through the provision of activating uses on the ground floor with office and hotel above. It responds to the existing easements by locating the development footprint outside of the ethane gas pipeline easement and providing at least 6m of clearance above ground from the desalination pipeline easement.

Blocks 2 and 3B combine to create a 6-level warehouse comprising ancillary office space, sleeved car parking, two (2) vehicular ramps and a central shared hardstand. It presents as two (2) clear built forms along the Cooks River with ancillary office space positioned along the Cooks River for the eastern warehouse and to the future Pemulwuy Park and Marsh Street for the western warehouse.

It includes supporting food and drink premise uses along the Cooks River foreshore adjacent to ancillary office areas. The warehouse includes three (3) levels of car parking sleeved into the Ground Floor of the warehouse adjacent to the ancillary office areas. The two (2) vehicle ramps enable clear and efficient circulation throughout the facility, both including two-way circulation and removing the need for vehicles to turn around to exit the facility.

Block 3A represents a 6-level warehouse comprising ancillary office space, sleeved car parking, supporting food and drink premise, single hardstand and two-way vehicle ramp. Block 3C includes a 5-level warehouse comprising ancillary office space, on-grade car parking, supporting food and drink premise, single hardstand and two-way vehicle ramp.

The Logistics Scheme is depicted in the Architectural Reference Scheme Drawings (**Appendix H**), with the Ground Floor Plan and Typical Floor Plan presented in **Figure 19** and **Figure 20** below.

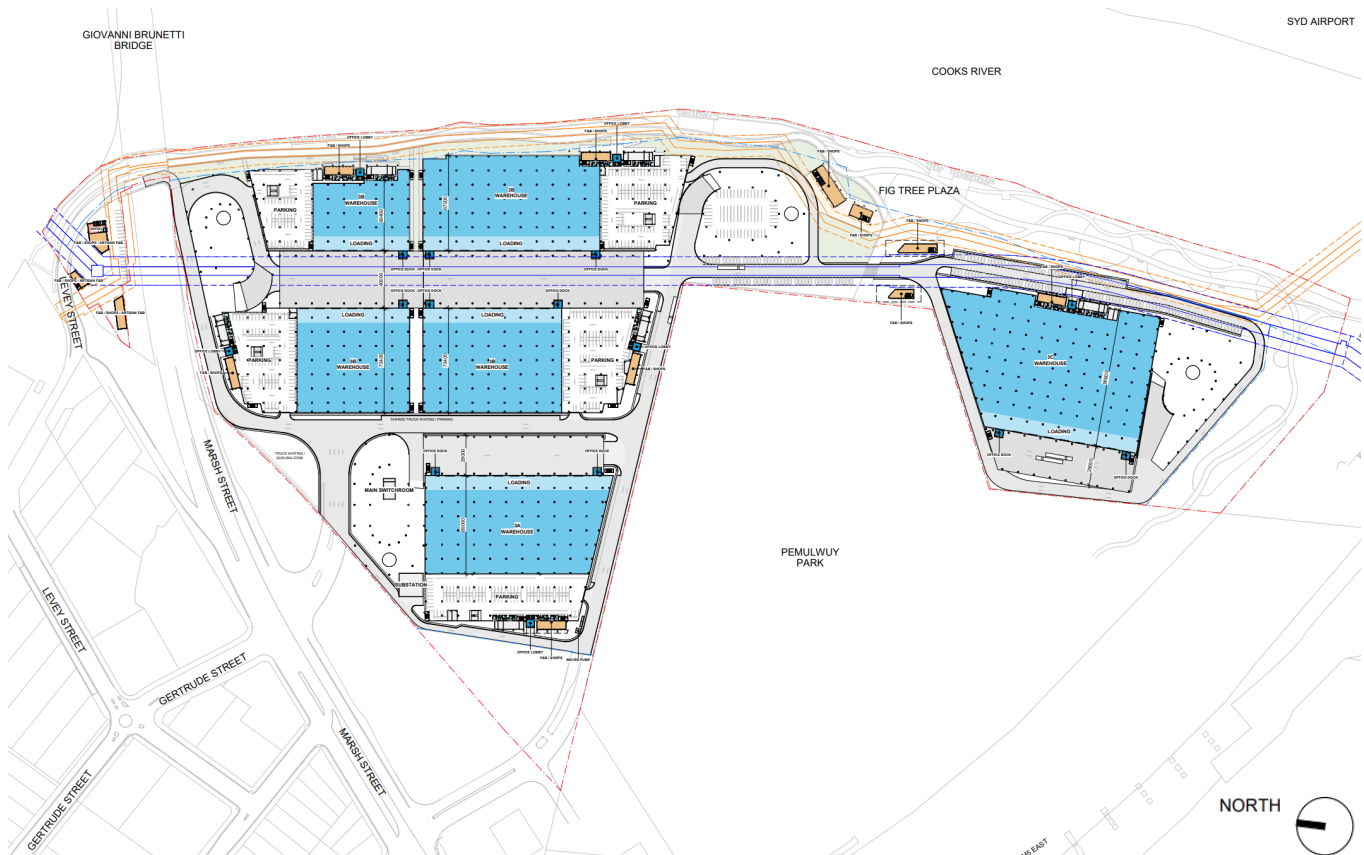


Figure 19 Ground Floor Plan – Logistics Scheme

Source: Grimshaw

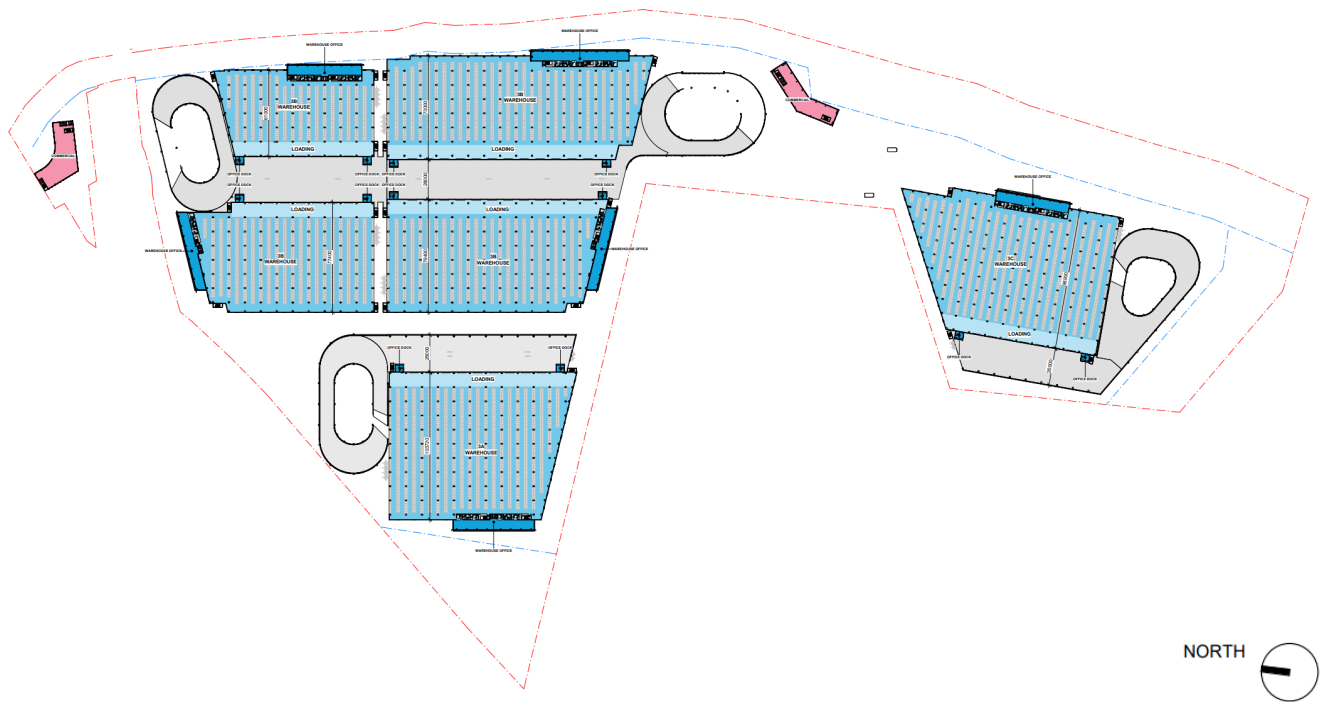


Figure 20 Typical Floor Plan (Levels 1-5) – Logistics Scheme

Source: Grimshaw

The Logistics scheme prepared by Grimshaw is depicted in the perspective renders presented in **Figure 21** to **Figure 24**. It depicts the built form associated with the primarily logistics scenario within the context of the surrounding development and landscape.



Figure 21 Aerial Perspective Render of the Logistics Scheme from the South-West

Source: Grimshaw



Figure 22 *Aerial Perspective Render of the Logistics Scheme from the North-East (Cooks River)*

Source: Grimshaw



Figure 23 *Aerial Perspective Render of the Logistics Scheme from the East (Cooks River)*

Source: Grimshaw



Figure 24 *Aerial Perspective Render of the Logistics Scheme from the West (Pemulwuy Park)*

Source: Grimshaw

Alternative Uses Scheme

The Alternative Uses scheme represents an indicative outcome for the incorporation of alternative permissible land uses under the Concept Masterplan. It includes an alternative mixed-use outcome on Block 2 and data centre outcome on Block 3C that ensures the highest and best use at the time of redevelopment can be delivered. The incorporation of alternatives uses continues to support the forecasted growth of Sydney Airport and Port Botany, indicatively providing between 231,600m²-293,000m² of warehouse GFA as well as hotel accommodation and office space to support the growth in passenger movements and businesses associated with Sydney Airport.

Block 1 remains unchanged compared to the Logistics Scheme, comprising a mixed-use outcome to support and enhance the redevelopment and surrounding development. It comprises built form positioned and articulated to maximise the outlook over the Cooks River to Tempe Recreation Reserve and Wolli Creek. It forms a key entry statement to the Kogarah Golf Club Redevelopment, positioned along the Cooks River foreshore link and representing one (1) of three (3) vehicular entry points for light vehicles.

Block 2 comprises a mixed-use outcome, including food and drink premises and shops on the ground floor, car parking within the podiums, two (2) hotel towers and one (1) office tower. The building footprints respond to the location of existing fig trees to enable their potential future preservation, while car parking in the podium responds to flooding constraints on the Site. The hotel towers comprise a total of nineteen (19) floors supporting 300 hotel rooms, while the office tower comprises seventeen (17) floors supporting 17,000m² of GFA.

Block 3A and 3B remain unchanged compared to the Logistics scheme with exception of minor changes to Block 3B to integrate with Block 2. This includes ancillary office space positioned adjacent to Cooks River Plaza North and changes to vehicular circulation due to the reduction of ramps. It is noted that all vehicular ramps include ramp gradients smoother than the minimum Australian Standards for greater usability, customer acceptance and operational flexibility. Each of the ramps comprises concrete upturn crash barriers and steel structure with acoustic ramp screening where required.

Block 3C comprises a data centre with an estimated total power consumption of 80 Megawatts (MW), including ancillary office area and on-grade car parking. The indicative data centre comprises four (4) levels, supporting associated infrastructure such as high-voltage rooms, water storage and fuel storage on the ground floor, three (3) data halls on Level 1-3, and mechanical plant located on the rooftop.

The Alternative Uses Scheme is depicted in the Architectural Reference Scheme Drawings (**Appendix H**), with the Ground Floor Plan and Typical Floor Plan presented in **Figure 25** and **Figure 26** below.

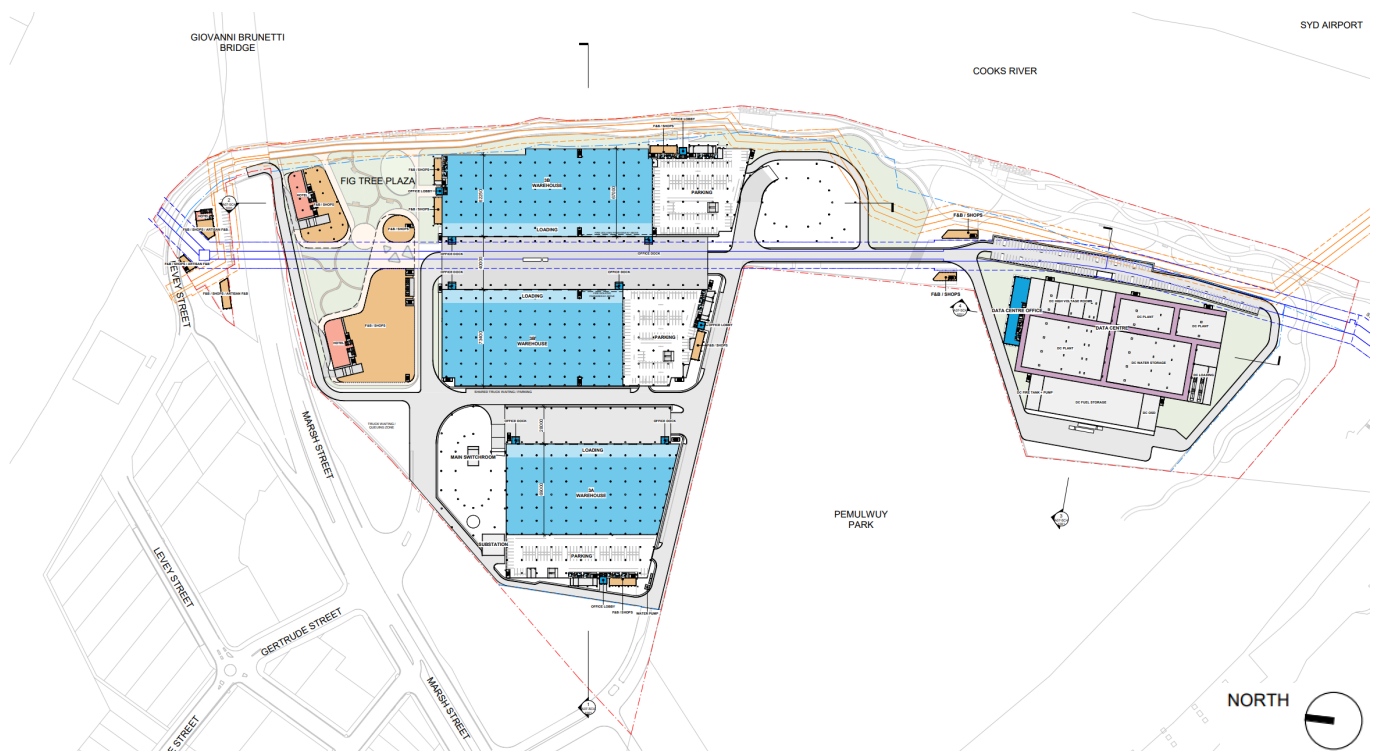


Figure 25 Ground Floor Plan – Alternative Uses Scheme

Source: Grimshaw

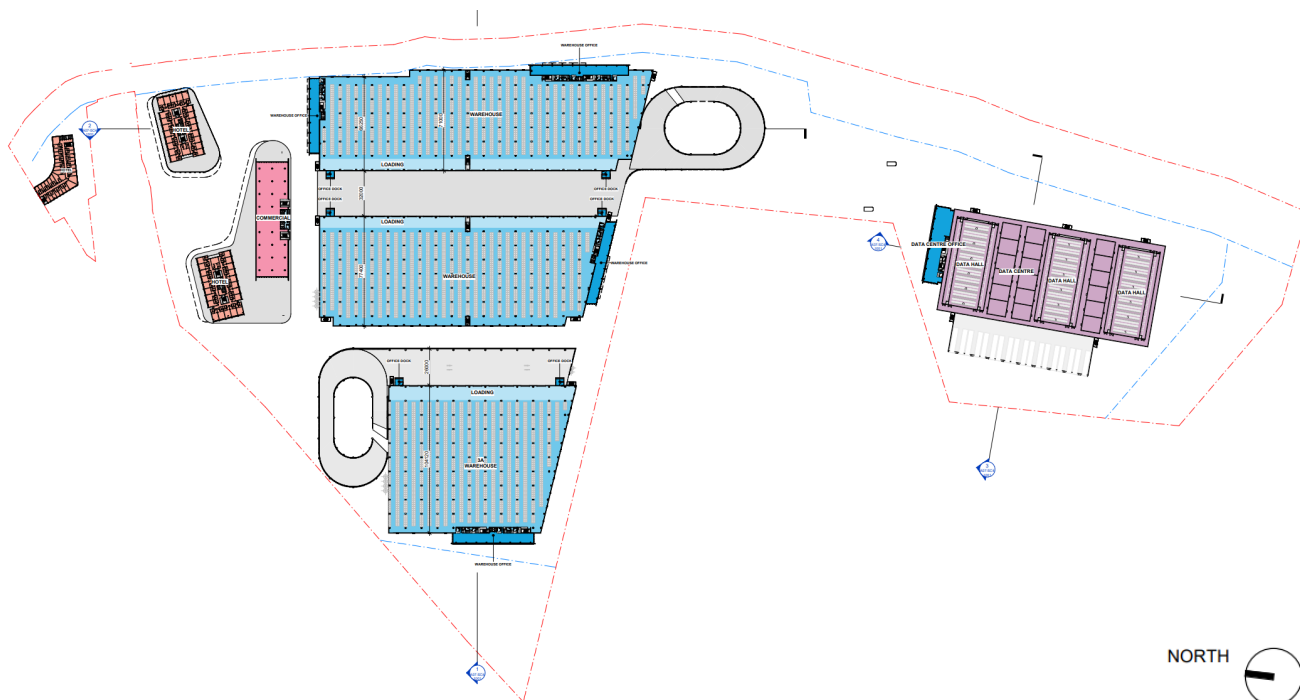


Figure 26 Typical Floor Plan (Level 1-5) – Alternative Uses Scheme

Source: Grimshaw

The Alternative Uses scheme prepared by Grimshaw is depicted in the perspective renders presented in **Figure 27** to **Figure 29**. It depicts the alternative mixed-use outcome on Block 2 and alternative data centre outcome on Block 3C within the context of the surrounding development and landscape.



Figure 27 Aerial Perspective Render of the Alternative Uses Scheme from the South-West

Source: Grimshaw



Figure 28 *Aerial Perspective Render of the Alternative Uses Scheme from the East (Cooks River)*

Source: Grimshaw



Figure 29 *Aerial Perspective Render of the Alternative Uses Scheme from the North-East (Cooks River)*

Source: Grimshaw

Indicative Landscape Design

The Indicative References Schemes are accompanied by conceptual landscape design which seeks to illustrate the potential future outcomes for the publicly open space within the development area. It is depicted in the Landscape Design Report and Landscape Reference Scheme Drawings prepared by Moir Studio and included at **Appendix I** and **J**.

The conceptual landscape design adopts a regenerative, site-responsive planting strategy that restores ecological function, while creating an engaging public landscape. It includes strong focus on key areas such as the Cooks River foreshore, Cooks River Plaza and connection to the future Pemulwuy Park. It has been guided by key landscape design principles identified in **Figure 30** below, which support the vision and objectives of the Kogarah Golf Club Redevelopment.



Figure 30 Landscape Design Principles – Indicative Reference Schemes

Source: Grimshaw

These guiding principles have inform the preparation of indicative landscape reference schemes for the Logistic Scheme and Alternative Uses Scheme, depicted in **Figure 31** and **Figure 32** on the following page. It depicts the concept landscape design for the Cooks River foreshore, Cooks River Plaza and connection to the future Pemulwuy Park.

Cooks River Plaza is proposed to be located between Block 3B and 3C adjacent to Pemulwuy Park in the Logistics scheme and proposed to be located at either Block 2 or between Block 3B and 3C under the Alternative Uses scheme. The ultimate location of Cooks River Plaza will be confirmed as part of a future Detailed DA.

The concept landscape design incorporates planting tailored to key zones that respond to the unique conditions, functions, and character of each area. These key zones include:

- **Cooks River Interface** – Riparian plantings that stabilise the riverbank, provide shade and habitat, and create a visually engaging waterfront edge;
- **20m and 40m Foreshore** – Multi-functional green spaces with a mix of sedges, grasses, shrubs, and trees that support ecological restoration, recreational use, and active transport pathways;

- **Cooks River Plaza North** – Builds off the significant existing Fig trees with planting to frame open spaces, provide shade and amenity, and enhance the urban character of this central precinct;
- **Cooks River Plaza South** – Generous zones of low planting and that maximises opportunities for habitat and is visually engaging; and
- **Pemulwuy Park Interface** – Integrates with the future parkland to extend ecological connectivity, provide habitat for fauna, and reinforce the park's role as a natural and cultural destination.



Figure 31 *Indicative Landscape Reference Scheme – Logistics Scheme*

Source: Moir Studio



Figure 32 *Indicative Landscape Reference Scheme – Alternative Uses Scheme*

Source: Moir Studio

The concept landscape design integrates opportunities for storytelling of Country, reconnecting the community with cultural and ecological values. The planting approach enhances water quality, stabilises soils, and delivers a dynamic, restorative, and resilient foreshore and open space network providing shade, comfort and amenity to users.

The revitalised Cooks River foreshore will become a 20-40m wide, continuous, accessible green corridor featuring walkways, cycle paths, and revitalised riparian landscapes. It is envisioned to create a vibrant publicly accessible waterfront that reconnects people with the river, enhances ecology, and links Cahill Park to the future Pemulwuy Park.

The foreshore is designed to achieve the following outcomes:

- Maximise public access and visual connectivity with the river;
- Provide a dedicated two-way cycle path, and safeguard for a future southern cycle connection across the SWSOOS;
- Deliver a diverse and natural pedestrian waterfront experience through promenades, walkways, and boardwalks;
- Support ecological restoration and habitat creation with mangrove and saltmarsh plantings;
- Preserve key view corridors to the future Pemulwuy Park and open river views; and
- Enhance public safety with pedestrian lighting and passive surveillance from adjoining development.

The concept landscape design for the Cooks River foreshore is depicted in **Figure 33** below.



Figure 33 *Perspective Render of the Indicative Cooks River Foreshore Setback in the Logistics Scheme looking North*

Source: Grimshaw

Cooks River Plaza will represent a significant node along the Cooks River foreshore, with the following options provided for either the Logistics Scheme or Alternative Uses scheme:

- Cooks River Plaza (north) serves as a major entry point to the site, offering spaces for people to pause and gather. The design seeks to retain as many existing trees as possible, including four (4) fig trees, which anchor the plaza and give it a strong sense of character. Positioned along the water's edge, the plaza is framed by retail and office frontages, creating a lively and welcoming environment.
- Cooks River Plaza (south) acts as a key node along the Cooks River Foreshore, providing opportunities for people to dwell, gather and celebrate. Located on the water's edge the space will be bordered by small retail and office buildings, framed by a backdrop of trees and planting that orientate the user towards the Cooks River.

The concept landscape design for Cooks River Plaza north and south is depicted in the artist impressions presented in **Figure 35** and **Figure 34** respectively.



Figure 34 *Perspective Render of the Indicative Cooks River Plaza South in the Logistics Scheme looking East*

Source: Grimshaw



Figure 35 *Perspective Render of the Indicative Cooks River Plaza North in the Alternative Use Scheme looking North*

Source: Grimshaw

3.2.5 Connecting with Country Framework

A Connecting with Country Framework has been prepared by Ngurra Advisory and included at **Appendix K**. It has been developed in consultation with Bidjigal Elders and Knowledge holders, who provided cultural knowledge and lived experience to guide the development of the framework.

The framework establishes the following cultural design principles that have informed the Concept Masterplan and will inform the future Detailed DAs:

- **Architecture and Built Form:**
 - **Acknowledgement of Country** – Design elements honour Bidjigal storeys, language and cultural presence;
 - **Cultural safety and inclusivity** – Buildings and public spaces are designed to welcome, gather and support ongoing connection to Country;
 - **Reading landform, movement and tidal systems** – Built form responds to the flat tidal landscape and the historical movement pathways shaped by water and shoreline ecologies;
 - **Revitalising language, stories and cultural identity** – Architecture and landscape elements reconnect people with Bidjigal cultural narratives;
 - **Sky Country and daily cycles of light** – Design reflects cultural relationships to sky, light, wind and daily cycle; and
 - **Materiality and textures** – Finishes reflect the colours and textures of saltwater Country, grounded in local ecology.
- **Landscape and Open Space:**
 - **Water as memory and life** – Water is honoured as a carrier of memory, identity and cultural teaching;
 - **Landscape and planting** – Endemic and culturally relevant species reflect local ecosystems and support ecological resilience;
 - **Home for humans and more-than-human kin** – the site acknowledges as a shared habitat for people, animals, plants and spiritual kin;
 - **Foreshore activation and storytelling** – The foreshore becomes a living cultural landscape, reconnecting people to saltwater country; and
 - **Cultural safety and gathering spaces** – Outdoor spaces support welcome, ceremony, storytelling and connection.

A detailed action plan will be developed to embed Bidjigal cultural principles across the precinct, which will guide the detailed design of each building within the precinct.

3.2.6 Urban Design Guidelines

The Concept Masterplan is supported by Urban Design Guidelines prepared by Colliers Urban Planning and included at **Appendix L**. The Urban Design Guidelines will guide the future detailed design and development of the Kogarah Golf Club Redevelopment, comprising specific objectives and guidelines for the design of the following key aspects:

- Land Use and Built Form;
- Façade and Materiality;
- Transport and Access;
- Connecting with Country;
- Landscaping and Interfaces;
- Ecologically Sustainable Development; and
- Signage.

The Urban Design Guidelines have been established to guide the development of high-quality built form and provide a consistent approach to the detailed design of individual buildings within the precinct. The future development associated with the Kogarah Golf Club Redevelopment should be consistent with the objectives and guidelines, with an assessment of consistency to be undertaken as part of Future Detailed DAs.

3.2.7 Indicative Staging and Delivery

The Concept Masterplan supports the staged delivery of the Kogarah Golf Club Redevelopment, supporting the gradual uptake and alignment with market need. The indicative staging and delivery of the development is outlined in **Table 11**, with the indicative built form staging depicted in **Figure 36**.

Following the associated External Roadworks and Early Works, it is expected that the delivery of built form will occur over four (4) stages. It is highlighted that the staging and delivery is indicative only, to be driven by the securement of tenants for future buildings and subject to authority approvals.

Further, it is noted that the embellishment on the Cooks River foreshore and creation of an active transport link is expected to be delivered together with development immediately adjacent to the foreshore.

Table 11 *Indicative Staging and Delivery*

Stage	Description	Indicative Timeframe
External Roadworks	Delivery of external roadworks, including upgrades to Marsh Street and Gertrude Street, in accordance with separate executed VPAs with TfNSW and Bayside Council (subject to separate DA).	2027–2028 (18 months)
Early Works	Delivery of initial site preparation and infrastructure works to support future built form and public open space, likely to be carried out in stages over time.	2028–2029 (18 months)
Stage 1	Delivery of Block 1 and Block 3A development and associated works including relevant portions of the internal road network (subject to separate future Detailed DA).	2028–2029 (18 months)
Stage 2	Delivery of Block 2 development and associated works including relevant portions of the Cooks River foreshore and internal road network (subject to separate future Detailed DA),	2029–2030 (18 months)
Stage 3	Delivery of Block 3B development and associated works including relevant portions of the Cooks River foreshore and internal road network (subject to separate future Detailed DA).	2029–2030 (18 months)
Stage 4	Delivery of Block 3C development and associated works including relevant portions of the Cooks River foreshore and internal road network (subject to separate future Detailed DA).	2031–2032 (18 months)

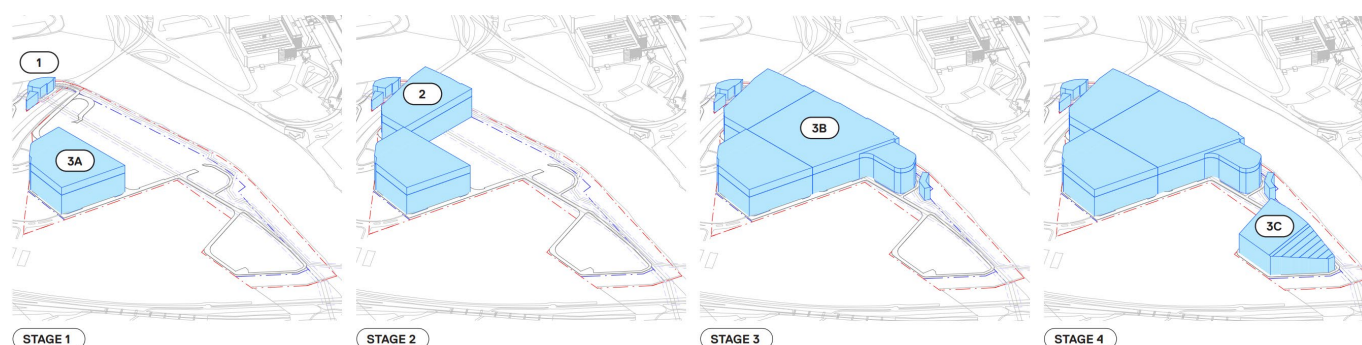


Figure 36 *Indicative Staging and Delivery – Concept Masterplan*

Source: Grimshaw

3.3 Early Works

The Early Works seeks consent for the carrying out of initial site preparation and infrastructure works required to support future development and publicly accessible open space. A detailed description of the proposed works to be carried out is provided in the following subsections.

3.3.1 Site Preparation Works

Demolition

To facilitate site preparation and infrastructure works, demolition of existing structures is proposed within the Early Works footprint area. A detailed Construction Environmental Management Plan (CEMP) will be prepared by the appointed Construction Contractor prior to demolition works commencing, in accordance with a condition of consent. It will outline the extent of demolition works and the process and techniques to ensure the appropriate disposal of materials.

Vegetation Removal

To enable completion of bulk earthworks, removal of existing vegetation is proposed within the Early Works footprint area. An Arboricultural Impact Assessment has been prepared by Canopy Consulting and is included at **Appendix M**. It determines 791 trees are required to be removed. The existing Figtree's surrounding the previous clubhouse are proposed to be retained until the final location of the Cooks River Plaza is determined and the feasibility of retention or transplantation can be confirmed.

The proposed vegetation removal is also supported by a Biodiversity Development Assessment Report (BDAR) prepared by SLR Consulting and included at **Appendix DD**. For further discussion, refer to **Section 6.13**.

Remediation

To ensure the Site is made suitable for future development, remediation is to be carried in accordance with the Remediation Action Plan (RAP) prepared by Douglas Partners included at **Appendix OO**. It identifies areas of environmental concern, including Asbestos Containing Material (ACM) in various locations and Underground Storage Tanks (USTs) with associated Benzene, toluene, ethylbenzene and toluene (BTEXs).

The RAP establishes a preferred remediation strategy, described as follows:

- Task 1 – Supplementary (data gap) contamination investigations to further assess specified identified elements prior to remediation being carried out:
- Task 2 – Remediation of surficial ACM:
 - A detailed walkover of the Cooks River foreshore and areas of the site surfaced with recovered aggregates to delineate the extent of the surficial ACM;
 - Emu-picking and off-site disposal of the ACM; and
 - Validation of the surface of the ACM footprints.
- Task 3 – Remediation of USTs and associated BTEX impacted soil:
 - Completion of a ground penetrating radar survey to assess the potential extent of the tanks and associated pipe work;
 - Excavation of the tanks, pipe work, and associated impacted soil; and
 - Validation of remediation excavations.

Contaminated material will be disposed of off-site, or on-site through an on-site treatment strategy, with any excavation to be backfilled with clean material following validation. For further discussion on contamination and remediation, refer to **Section 6.19**.

Bulk Earthworks

To facilitate future development and publicly accessible open space, bulk earthworks, including ground improvement and flood mitigation works, are proposed to be carried out. The proposed bulk earthworks and associated works are depicted in the Civil Drawings prepared by Costin Roe Consulting included at **Appendix N**.

The proposed earthworks include cut and fill to achieve large flat building pads with a proposed bulk excavation level of RL 1.60m AHD to support future development comprising finished floor levels of RL 3.60m AHD. It also includes the creation of an overland flow path outside of the development area through minor excavation to contour the existing topography, providing a critical flooding mitigation measure in accordance with the executed VPA with Council.

To facilitate the proposed building pads, filling of approximately 0-2m is generally required across the development area with the exception of specific high areas that require cut. While a cut of approximately 0-2m is required to create the proposed overland flow path.

As outlined in **Table 12** and depicted in **Figure 37** to **Figure 39**, an estimated fill import of 51,300m³ is required for the development area, while an estimated fill export of -13,600m³ required for the overland flow path.

Table 12 Estimated Cut and Fill Volumes

Component	Lower Bound (-15%)	Apparent Volume	Upper Bound (+15%)
Development Area			
Cut	-26,223m ³	-30,850m ³	-35,478m ³
Fill	+88,783m ³	+104,450m ³	+120,118m ³
Detailed Excavation	-18,955m ³	-22,300m ³	+25,645m ³
Balance	+43,605m ³ (import)	+51,300m ³ (import)	+58,995m ³ (import)
Overland Flow Path			
Cut	-18,785m ³	-22,100m ³	-25,415m ³
Fill	+7,225m ³	+8,500m ³	+9,775m ³
Balance	-11,560m ³ (export)	-13,600m ³ (export)	-15,640m ³ (export)

Source: Costin Roe Consulting

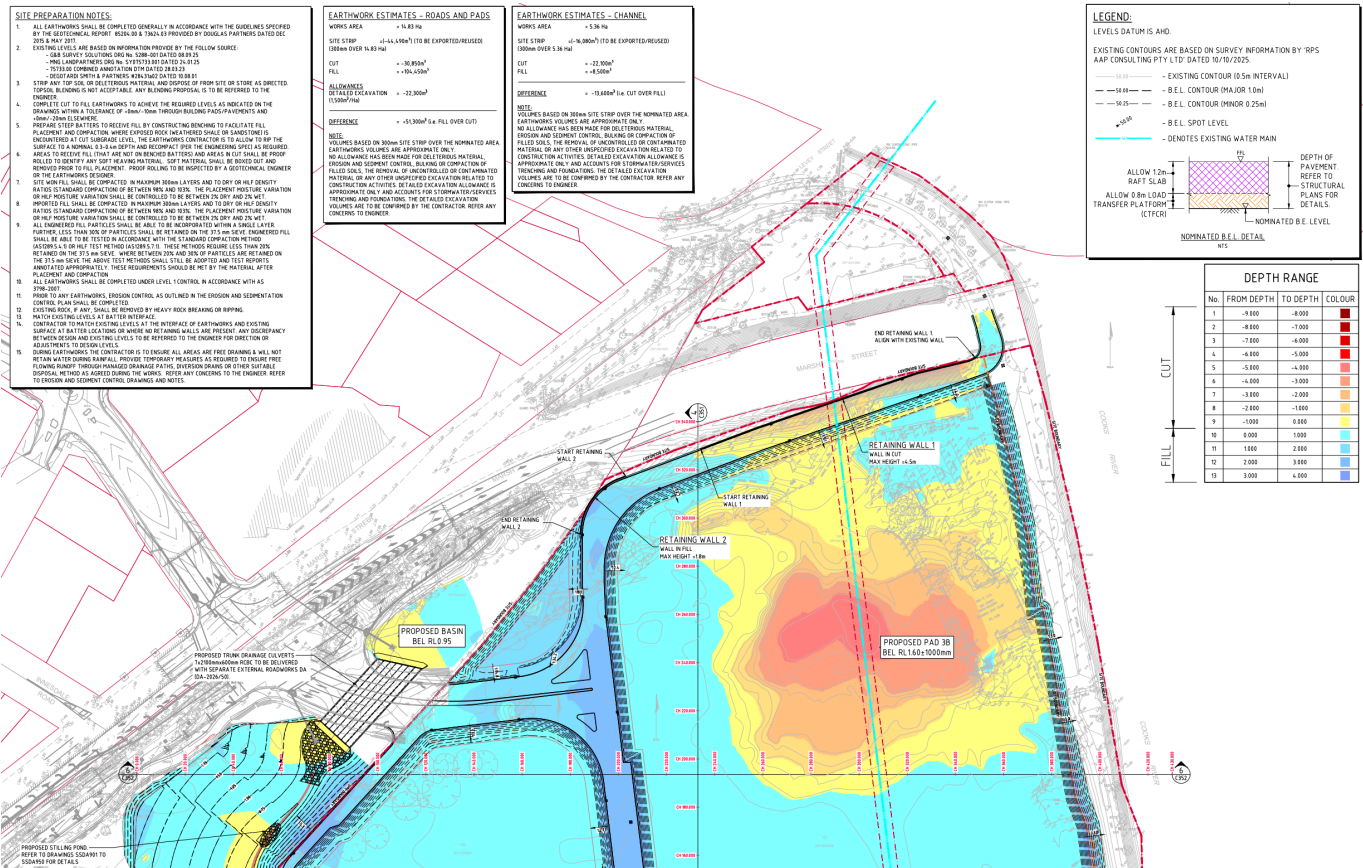


Figure 37 Proposed Bulk Earthworks Plan (C09919.06-SSDA301)

Source: Costin Roe Consulting

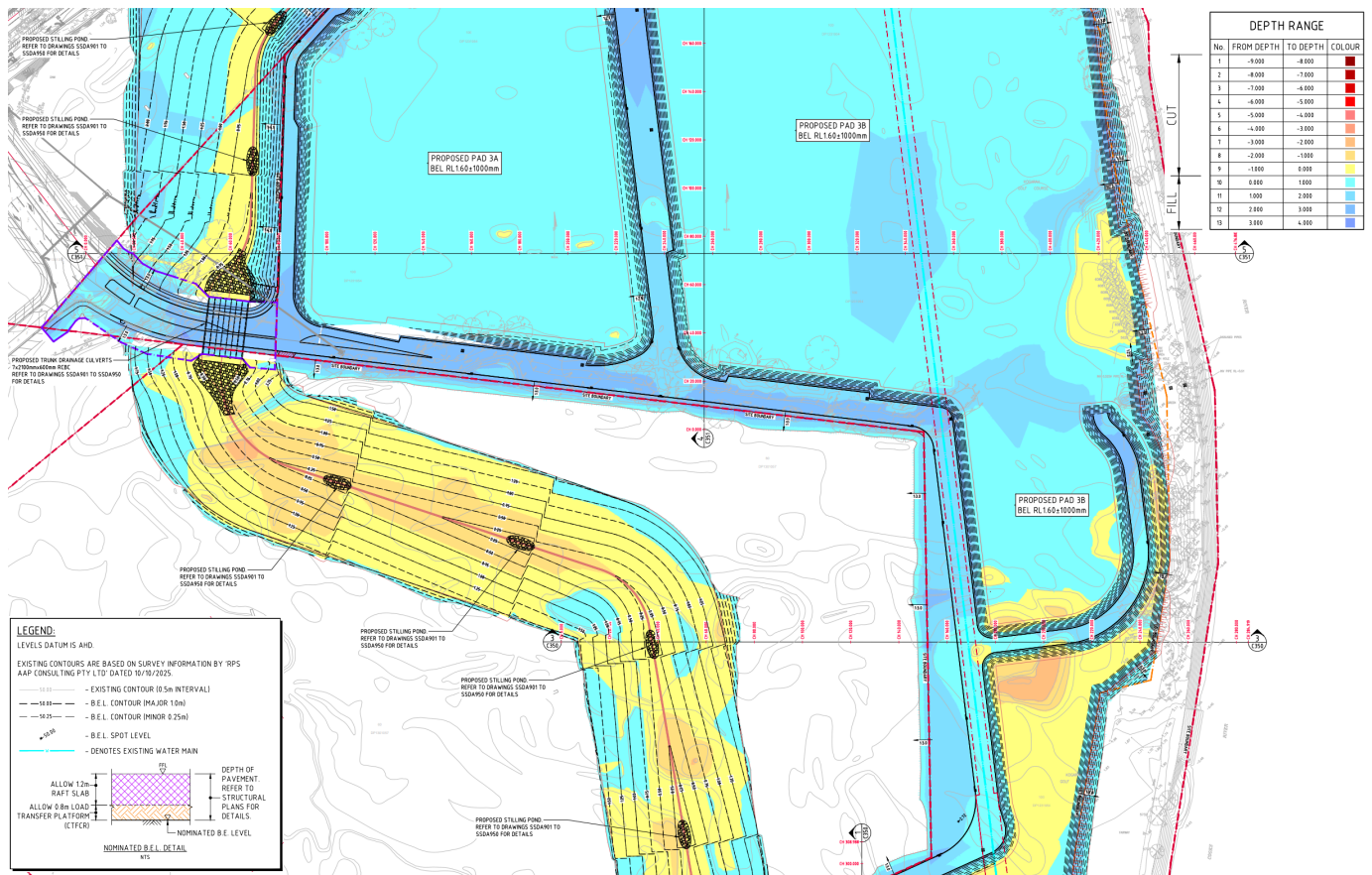


Figure 38 Proposed Bulk Earthworks Plan (CO9919.06-SSDA302)

Source: Costin Roe Consulting

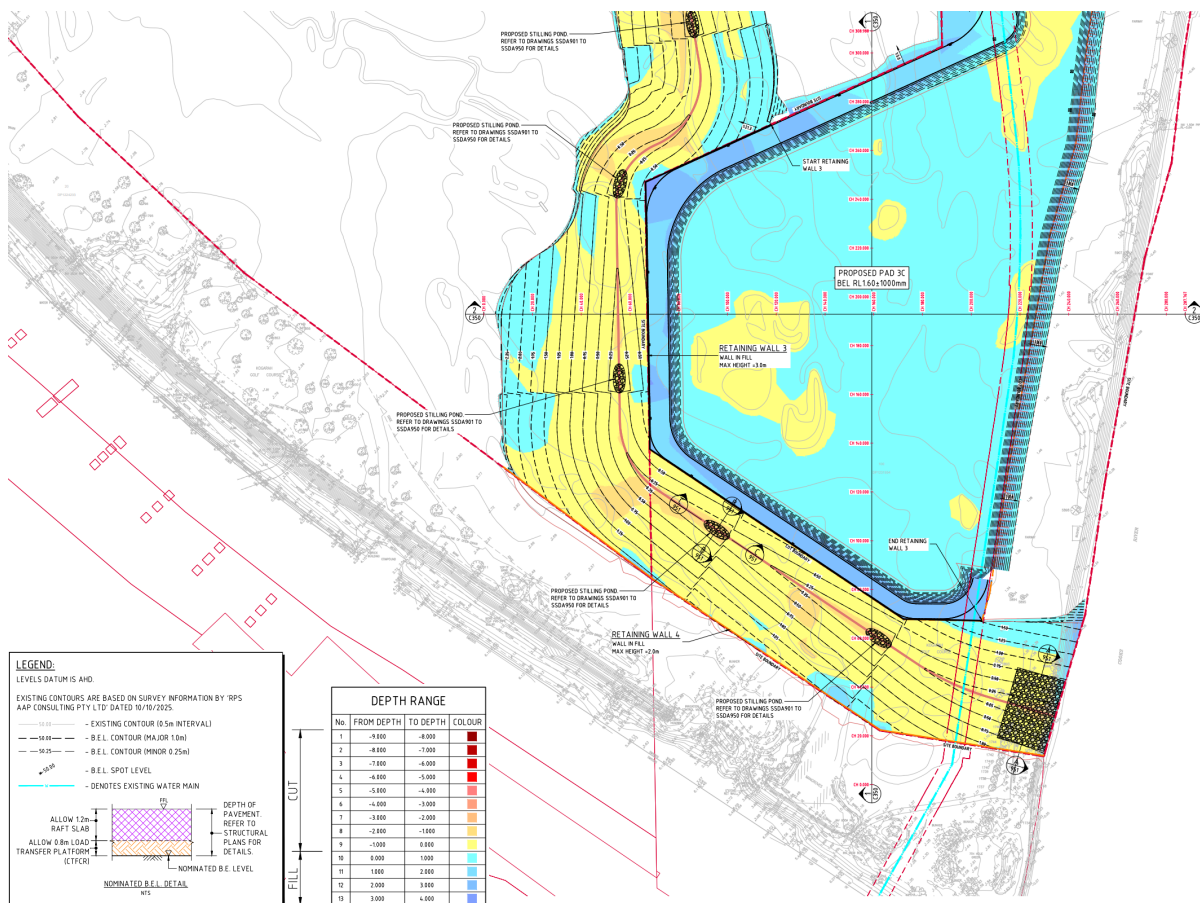


Figure 39 Proposed Bulk Earthworks Plan (CO9919.06-SSDA303)

Source: Costin Roe Consulting

The existing ground conditions vary across the Site and will require ground improvement works to support the future development of the Site. All significant building loads will need to be supported on piled foundations or significant ground improvement, such as using Controlled-Modulus Columns (CMCs) or stone columns with load transfer platforms.

The potential ground improvement strategies include the installation of CMCs with transfer platforms to support building loads and in areas with deep soft and firm clay. This technique involves installing columns of stiffer material (e.g. concrete, grout) within the weaker profile, effectively increasing the modulus of the weaker material to reduce overall settlements to tolerable levels.

Another potential ground improvement method may involve the installation of stone columns, which has a similar soil stiffening effect to CMCs with an added benefit of providing a short, horizontal drainage pathway for consolidating soils. This can substantially reduce the time for primary consolidation of clayey soil.

3.3.2 Site Infrastructure Works

Flora Street East Extension

The Early Works include the construction of an extension to Flora Street East, representing Item 3 of the executed Local VPA with Council (described in **Section 1.4.4**). It will connect to the proposed external roadworks along Marsh Street, subject to the separate External Roadworks DA (DA-2026-50) described in **Section 1.5.1**.

The proposed design is consistent with the Item 3 of the Local VPA and completes the connection from Marsh Street to the development area and Council land designated for the future Pemulwuy Park. It is depicted in the Civil Drawings prepared by Costin Roe Consulting and Flora Street East Landscape Drawings prepared by Moir Studio, included at **Appendix N** and **O** respectively.

The Flora Street East extension is located over the proposed drainage channel via culverts and is described as including:

- A single eastbound lane and dedicated right-turn lane with associated medians into Council's land and access to the future Pemulwuy Park; and
- A single westbound lane transitioning into dual lanes when connecting to the Marsh Street / Flora Street signalised intersection.

The proposed road design and associated landscaping is depicted in **Figure 40** and **Figure 41** below.

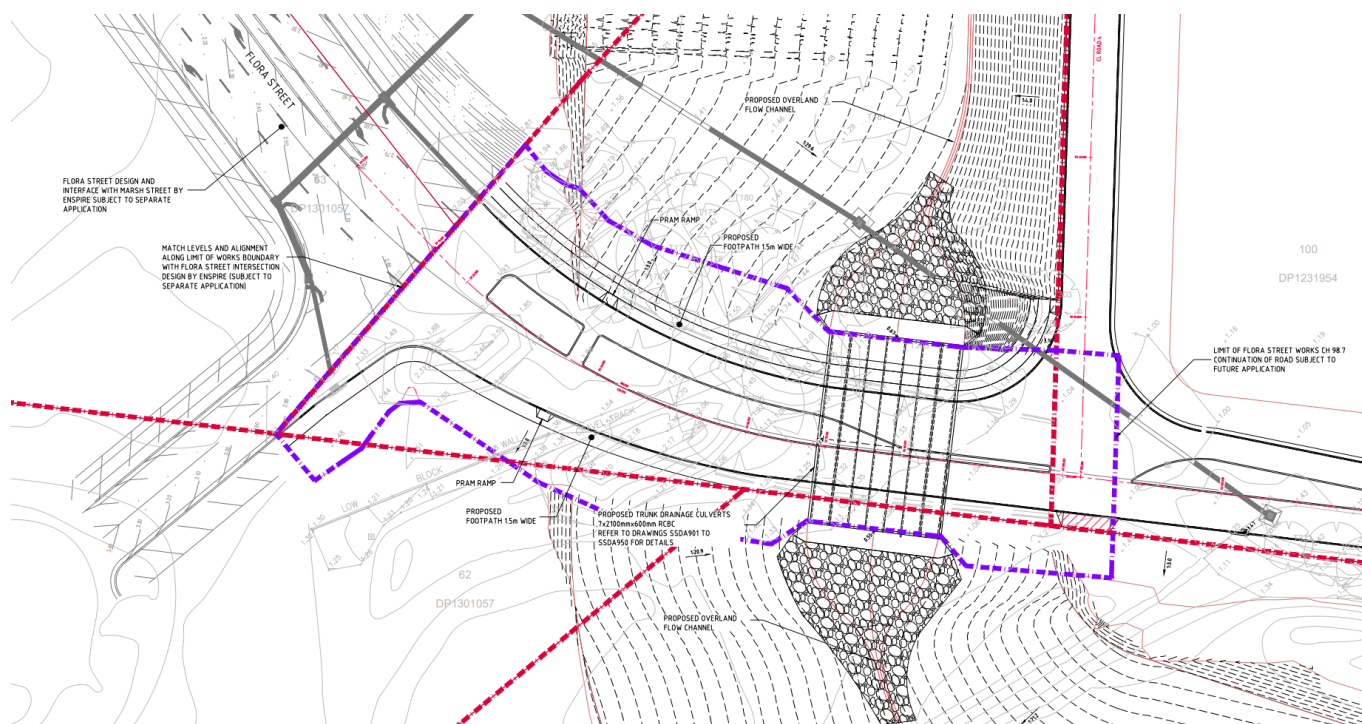


Figure 40 Proposed Flora Street East Extension Design

Source: Costin Roe Consulting

Services and Utilities

To support future development, the delivery of necessary service and utility infrastructure is proposed to meet future operational requirements. The proposed service and utility infrastructure is described in the Service Infrastructure Report prepared by Lucid Consulting and Preliminary Water Servicing Strategy prepared by AT&L, included at **Appendix PP** and **Appendix QQ** respectively.

The proposed service and utility infrastructure are summarised in **Table 13** below.

Table 13 *Service and Utilities*

Utility	Description
Electrical	To enable adequate electrical infrastructure, a High-Voltage (HV) lead-in connection is required. It is expected that the HV connection will comprise connection to Ausgrid R Type High Voltage Customer (HVC) kiosk, Ausgrid substation, pits, conduits and chamber substation structure with Ausgrid HV cables. The proposed HV supply will be provided via underground high voltage cables installed within an underground conduit with a 2m easement to the HVC.
Potable Water	The Site is located within the Rockdale Gravity Remainder Pressure Zone for potable water supply and also partly located within the Potts Hill Drinking Water servicing area. It is expected that connection will be made to existing infrastructure within Marsh Street, with the nominated Water Services Coordinator currently undertaking a feasibility application with Sydney Water.
Wastewater	The Site is located within the Cooks River South wastewater catchment, which includes the Southern and Western Suburbs Ocean Outfall Sewer (SWSOOS). It includes existing sewer infrastructure on and adjacent to the Site, with the nominated Water Services Coordinator currently undertaking a feasibility application with Sydney Water.
Telecommunication	To provide telecommunication services to the Site, underground lead-in infrastructure will be connected to existing services along Marsh Street as part of the proposed road connections from Marsh Street to the development area.
Gas	There is currently no proposed connection to gas infrastructure at this stage.

Source: Lucid Consulting, AT&L

3.3.3 Construction Management

A Construction Environmental Management Plan (CEMP) will be developed by the appointed contractor to manage on-site works and impacts. It will provide a detailed description of the phasing and delivery of the development.

The Early Works are proposed to be carried out in accordance with Bayside Council's standard construction hours:

- **Monday to Friday** – 7.00am to 6.00pm;
- **Saturday** – 7.00am to 5.00pm; and
- **Sunday / Public holidays** – No work.

3.3.4 Indicative Staging and Delivery

To enable the appropriate and orderly delivery of the Early Works, it is expected that the works will be staged. An indicative staging plan for the Early Works is depicted in **Figure 43**, with the implementation and specific staging to be confirmed prior to the commencement of works in accordance with relevant conditions of consent.

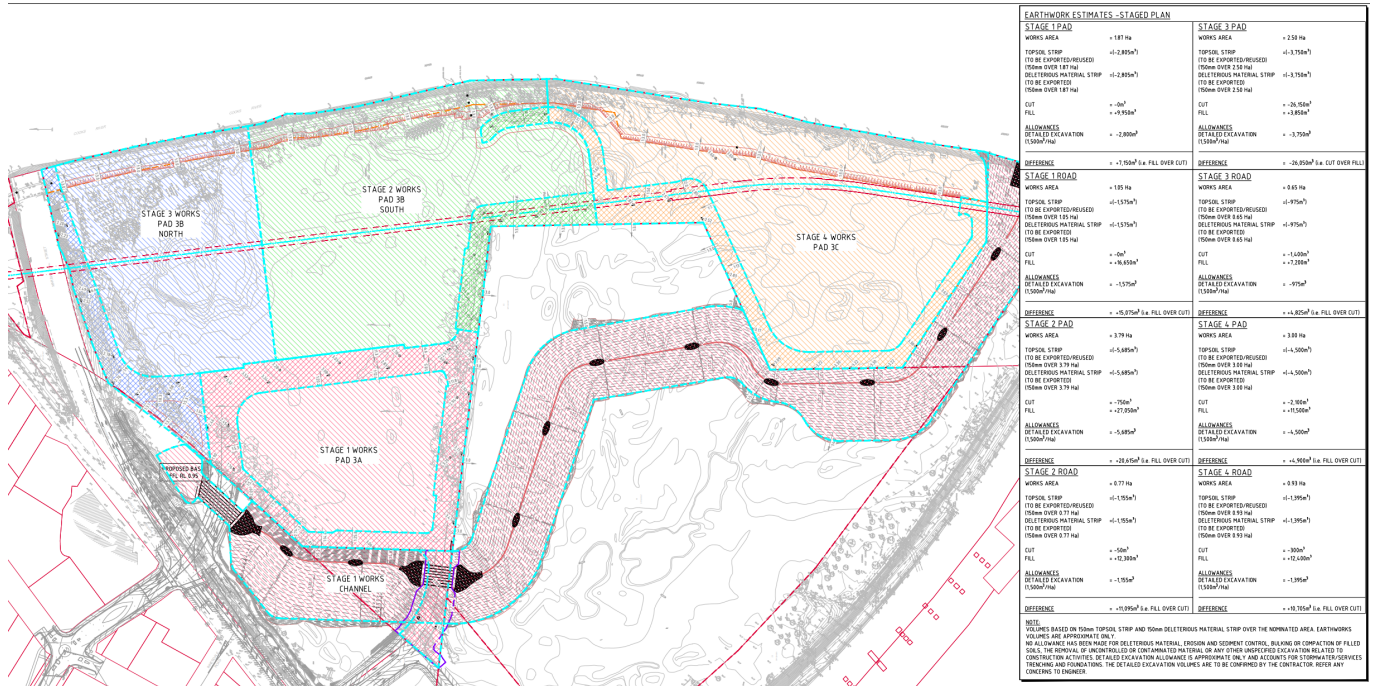


Figure 43 Indicative Early Works Staging Plan

Source: Costin Roe Consulting

4.0 Statutory Context

The Applicant seeks development consent under ‘Division 4.7 – Stage Significant Development’ of the EP&A Act, with the Proposal’s consistency with the key statutory requirements outlined in the following subsections. It is supported by a Statutory Compliance Table at **Appendix B** which identifies all relevant statutory requirements and where those requirements have been addressed.

4.1 Power to Grant Approval

The legislative pathway under which consent is sought, why the pathway applies, and the relevant consent authority is outlined in **Table 14** below.

Table 14 Power to Grant Consent

Matter	Consideration
Declaration of State Significant Development	Development consent is sought under ‘Division 4.7 - Stage Significant Development’ of the EP&A Act. Section 4.36(2) of the EP&A Act states that: <i>A State environmental planning policy may declare any development, or any class or description of development, to be State significant development.</i> Schedule 1 of the Planning Systems SEPP identifies development that is declared State significant development, with the Proposal triggering the following thresholds.
	Warehouses or Distribution Centres Section 12(1) under Schedule 1 of the Planning Systems SEPP relates to ‘warehouses or distribution centres’, which states: <i>(1) Development that has an estimated development cost of more than the relevant amount for the purpose of warehouses or distribution centres (including container storage facilities) at one location and related to the same operation.</i> <i>relevant amount means—</i> <i>(a) for development in relation to which the relevant environmental assessment requirements are notified under the Act on or before 31 May 2023—\$30 million, or</i> <i>(b) for any other development—\$50 million.</i> The Concept Masterplan includes Warehouse or distribution centre uses, which are depicted in the Indicative Reference Schemes as multi-level logistics buildings. All individual multi-level logistics buildings depicted in the Indicative Reference Schemes represent development at one (1) location and related to the same operation with an Estimated Development Cost (EDC) greater than \$50 million. Therefore, all Warehouse or distribution centre uses associated with the Concept Masterplan are classified as SSD for the purposes of EP&A Act.
	Cultural, Recreation and Tourist Facilities Section 13(2) under Schedule 1 of the Planning Systems SEPP relates to ‘Cultural, recreation and tourist facilities’, which states: <i>(2) Development for other tourist related purposes (but not including any commercial premises, residential accommodation and serviced apartments whether separate or ancillary to the tourist related component) that—</i> <i>(a) has an estimated development cost of more than \$100 million, or</i> <i>(b) has an estimated development cost of more than \$10 million and is located in an environmentally sensitive area of State significance or a sensitive coastal location.</i> The Concept Masterplan includes a Hotel and motel accommodation use on Block 2, depicted in the Alternative Use scheme as a hotel. This use is defined as a type of development for ‘other tourist related purposes’, where the hotel development in the Alternative Use scheme comprises an EDC of more than \$100 million. Therefore, the Hotel and motel accommodation use associated with the Concept Masterplan is classified as SSD for the purposes of EP&A Act.

Data Centres

Section 25(1) under Schedule 1 of the Planning Systems SEPP relates to 'Data centres', which states:

(1) Development for the purpose of data centres that has a total power consumption of more than the relevant amount.

(2) In this section—

relevant amount means—

(a) for development in relation to which the relevant environmental assessment requirements are notified under the Act on or before 31 May 2023—10 megawatts, or

(b) for any other development—15 megawatts.

The Concept Masterplan includes a *Data centre* use on Block 3C, depicted in the Alternative Use scheme as a data centre with an estimated total power consumption of 80 megawatts.

Therefore, the *Data centres* use associated with the Concept Masterplan is classified as SSD for the purposes of EP&A Act.

Before SSD can be determined, it is subject to a comprehensive assessment under the EP&A Act.

In accordance with Section 2.6(2) of the Planning Systems SEPP, all parts of a single DA are also declared SSD for the purposes of EP&A Act, except for so much of the remainder of the development that is not sufficiently related to the SSD.

The consent authority may be satisfied that any components not considered SSD are sufficiently related given all logistics buildings in the Indicative Reference Schemes are classified as SSD, with the alternative mixed-use development on Block 2 comprising a hotel classified as SSD and the data centre on Block 3C classified as SSD.

Further, any remaining components of the Concept Masterplan represent important elements that contribute to the creation of a functional and cohesive development outcome. This includes Block 1, which represents a key entry statement to the precinct fronting the Cooks River foreshore link. It will provide complementary uses to supplement and support the primary land uses on the remainder of the Site, also supporting the activation of the foreshore link.

Therefore, the consent authority may be satisfied that all components of the development are sufficiently related.

Consent Authority

Section 4.5 of the EP&A Act and Section 2.7 of the Planning Systems SEPP stipulate that the consent authority is the Minister for Planning and Public Spaces (or the DPHI as their delegate) unless the development triggers the matter set out in Section 2.7(1) in which case the consent authority will be the Independent Planning Commission.

4.2 Permissibility

The permissibility of the Proposal considering the proposed primary land uses and zoning is outlined in **Table 15** below.

Table 15 Permissibility

Matter	Consideration
Land Uses	The proposed primary land uses under the Concept Masterplan are outlined in Section 3.2.2 , with the ability to be accompanied by supporting or ancillary uses. It is also noted that the Early Works include the construction of roads and flood mitigation works.
Land Zoning	The development area is located within the SP4 Enterprise and C2 Environmental Conservation zones under the Bayside LEP 2021. It is noted that the broader site also includes land zoned RE1 Public Recreation and SP2 Infrastructure.
Permissibility	The proposed primary land uses under the Concept Masterplan are permissible with consent in the SP4 Enterprise zone or permissible via the additional permitted uses under the Bayside LEP 2021: • <i>Advertising structures</i> (Block 1) on Lot 31 DP 1231486 are permissible with consent under Schedule 1, Clause 47 of the Bayside LEP 2021; and • <i>Trade-related enterprise</i> (Block 2, 3A, 3B, 3C) on Lot 100 DP 1231954 are permissible with consent under Section 6.20 of the Bayside LEP 2021.

It is noted that the permissibility of future development under the Concept Masterplan will also be considered as part of future Detailed DAs.

The proposed roads and flood mitigation works under the Early Works are permissible with consent under the RE1 Public Recreation and C2 Environmental Conservation zones.

4.3 Other Approvals

The other legislative approvals required for the Proposal in addition to a consent under Division 4.7 of the EP&A Act are outlined in **Table 16**. While specific approval is not required, the relevant matters relating to these approvals are to be assessed as part of this SSDA.

Table 16 Other Approvals

Matter	Consideration																		
Approvals not required for SSD	Section 4.41 of the EP&A Act stipulates that certain authorisations are not required for SSD. The legislative approvals that would otherwise be required if the Proposal was not SSD are outlined below.																		
	<table><tr><th>Legislation</th><th>Approval Otherwise Required</th></tr><tr><td colspan="2">Legislation that does not apply to State Significant Development</td></tr><tr><td>(b) a permit under section 201, 205 or 219 of the Fisheries Management Act 1994,</td><td>No</td></tr><tr><td>(c) an approval under Part 4, or an excavation permit under section 139, of the Heritage Act 1977,</td><td>No</td></tr><tr><td>(d) an Aboriginal heritage impact permit under section 90 of the National Parks and Wildlife Act 1974,</td><td>No</td></tr><tr><td>(f) a bush fire safety authority under section 100B of the Rural Fires Act 1997,</td><td>No</td></tr><tr><td>(g) a water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91 of the Water Management Act 2000.</td><td>Yes</td></tr></table>	Legislation	Approval Otherwise Required	Legislation that does not apply to State Significant Development		(b) a permit under section 201, 205 or 219 of the Fisheries Management Act 1994,	No	(c) an approval under Part 4, or an excavation permit under section 139, of the Heritage Act 1977,	No	(d) an Aboriginal heritage impact permit under section 90 of the National Parks and Wildlife Act 1974,	No	(f) a bush fire safety authority under section 100B of the Rural Fires Act 1997,	No	(g) a water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91 of the Water Management Act 2000.	Yes				
	Legislation	Approval Otherwise Required																	
	Legislation that does not apply to State Significant Development																		
	(b) a permit under section 201, 205 or 219 of the Fisheries Management Act 1994,	No																	
	(c) an approval under Part 4, or an excavation permit under section 139, of the Heritage Act 1977,	No																	
	(d) an Aboriginal heritage impact permit under section 90 of the National Parks and Wildlife Act 1974,	No																	
	(f) a bush fire safety authority under section 100B of the Rural Fires Act 1997,	No																	
(g) a water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91 of the Water Management Act 2000.	Yes																		
Consistent Approvals	Section 4.42 of the EP&A Act stipulates that certain authorisations cannot be refused if they are necessary for carrying out SSD. The following legislative approvals are required for the Proposal and cannot be refused if it is approved.																		
	<table><tr><th>Legislation</th><th>Approval Required</th></tr><tr><td colspan="2">Legislation that must be applied consistently</td></tr><tr><td>(a) an aquaculture permit under section 144 of the Fisheries Management Act 1994,</td><td>No</td></tr><tr><td>b) an approval under the Coal Mine Subsidence Compensation Act 2017, section 22,</td><td>No</td></tr><tr><td>(c) a mining lease under the Mining Act 1992</td><td>No</td></tr><tr><td>(d) a production lease under the Petroleum (Onshore) Act 1991,</td><td>No</td></tr><tr><td>(e) an environment protection licence under Chapter 3 of the Protection of the Environment Operations Act 1997 (for any of the purposes referred to in section 43 of that Act),</td><td>No</td></tr><tr><td>(f) a consent under section 138 of the Roads Act 1993</td><td>Yes</td></tr><tr><td>(g) a licence under the Pipelines Act 1967.</td><td>No</td></tr></table>	Legislation	Approval Required	Legislation that must be applied consistently		(a) an aquaculture permit under section 144 of the Fisheries Management Act 1994,	No	b) an approval under the Coal Mine Subsidence Compensation Act 2017, section 22,	No	(c) a mining lease under the Mining Act 1992	No	(d) a production lease under the Petroleum (Onshore) Act 1991,	No	(e) an environment protection licence under Chapter 3 of the Protection of the Environment Operations Act 1997 (for any of the purposes referred to in section 43 of that Act),	No	(f) a consent under section 138 of the Roads Act 1993	Yes	(g) a licence under the Pipelines Act 1967.	No
	Legislation	Approval Required																	
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	(a) an aquaculture permit under section 144 of the Fisheries Management Act 1994,	No																	
	b) an approval under the Coal Mine Subsidence Compensation Act 2017, section 22,	No																	
	(c) a mining lease under the Mining Act 1992	No																	
	(d) a production lease under the Petroleum (Onshore) Act 1991,	No																	
(e) an environment protection licence under Chapter 3 of the Protection of the Environment Operations Act 1997 (for any of the purposes referred to in section 43 of that Act),	No																		
(f) a consent under section 138 of the Roads Act 1993	Yes																		
(g) a licence under the Pipelines Act 1967.	No																		
EPBC Approval	The <i>Environmental Protection and Biodiversity Conservation Act 1999</i> (EPBC Act) requires approval from the Commonwealth Minister for the Environment for actions that will have a significant effect on Matters of National Environmental Significance (MNES), including identified threatened species.																		
	Under the EPBC Act, any action (which includes a development, project or activity) that is considered likely to have a significant impact on MNES (including nationally listed threatened ecological communities and species, and listed migratory species) must be referred to the Australian Government Minister for the Environment (the Minister), to determine whether the action is a ‘controlled action’, and requires Commonwealth approval by the Federal Department of Climate Change, Energy, the Environment and Energy.																		
	A Biodiversity Development Assessment Report (BDAR) (Appendix DD) has been prepared by SLR Consulting. It confirms that a referral application under the EPBC Act was lodged on 3 February 2026.																		

The Commonwealth Department of Climate Change, Energy and Environment and Water confirmed that the proposed action is not a controlled action on 20 March 2026, and no further assessment is required under the EPBC Act is required.

4.4 Pre-Conditions to Exercising the Power to Grant Consent

The pre-conditions to be fulfilled by the consent authority before exercising their power to grant development consent are identified and considered in **Table 17** below.

Table 17 *Pre-Conditions to Exercising the Power to Grant Consent*

Matter	Consideration
<i>Biodiversity Conservation Act 2016</i>	Section 7.9 of the <i>Biodiversity and Conservation Act 2016</i> (BC Act) requires an SSDA to be accompanied by a BDAR, unless the Planning Agency Head and the Environment Agency Head determine that the Proposal is not likely to have any significant impact on biodiversity values. A BDAR (Appendix DD) has been prepared by SLR Consulting. It considers the likely impact of the Proposal on biodiversity values, with further discussion provided in Section 6.11.
<i>Environmental Planning and Assessment Regulation 2021</i>	Section 33 of the EP&A Regulations allows various stages of a development to be completed under a Concept DA, where information required under the Regulations for the various stages of development may be deferred to a subsequent DA(s). Section 35B of the EP&A Regulation stipulates that given the SSDA contravenes the Height of Buildings development standard under Section 4.3 of the Bayside LEP 2021, it must be accompanied by a document that demonstrates that: • Compliance with the development standard is unreasonable or unnecessary in the circumstances; • There are sufficient environmental planning grounds to justify the contravention of the development standard. A Clause 4.6 Variation Request (Appendix P) has been prepared by Colliers Urban Planning. It demonstrates that compliance with the Height of Buildings development standard is justified in consideration of Section 35B of the EP&A Regulation.
<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>	Chapter 2 of <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> (Resilience and Hazards SEPP) aims to manage development in the coastal zone and protect the environmental assets of the coast. The Site is partially located on land identified as a 'coastal environment' and 'coastal use area' under Section 2.10 and 2.11 of the Resilience and Hazards SEPP. A detailed assessment confirming that the Proposal will not result in adverse impacts to the coastal environmental elements is provided in the Statutory Compliance Table (Appendix B). Chapter 4 of the Resilience and Hazards SEPP aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment. Specifically, Section 4.6 stipulates that a consent authority must not consent to the carrying out of development unless: • It has considered whether the land is contaminated, and if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out. • If the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is suitable that the land will be remediated before the land is used for that purpose. A Preliminary Site Investigation (PSI) (Appendix NN) and Detailed Site Investigation (DSI) (Appendix NN) has been prepared by Douglas Partners. The PSI assesses the overland flow path, while the DSI assesses the development area. The assessments conclude the Site can be made suitable for the Proposal subject to the completion of a Remediation Action Plan (RAP). A RAP has subsequently been prepared by Douglas Partners and included at Appendix OO. It concludes that the Site can be made suitable for the proposed land uses. For further discussion on contamination and remediation, refer to Section 6.19.

Chapter 2 of *State Environmental Planning Policy (Transport and Infrastructure) 2021* (Transport and Infrastructure SEPP) aims to facilitate the effective delivery of infrastructure of the State.

Section 2.77 relates to development adjacent to pipeline corridors and stipulates that before determining a DA for development adjacent to land in a pipeline corridor, the consent authority must:

- Be satisfied that the potential safety risks or risks to the integrity of the pipeline that are associated with the development to which the application relates have been identified;
- Take those risks into consideration;
- Give written notice of the application to the pipeline operator concerned within 7 days after the application is made; and
- Take into consideration any response to the notice that is received from the pipeline operator within 21 days after the notice is given.

The Site is affected by two (2) pipeline corridors, identified as the Sydney Desalination Pipeline and Moombah-Sydney Pipeline (refer to **Figure 11**). A Preliminary Hazard Analysis (PHA) (**Appendix Y**) has been prepared by Arriscar to confirm that the risk criteria published in HIPAP No.4 is satisfied, based on the risks generated by gas pipelines and associated infrastructure near the Proposal, as well as the proposed land uses.

Therefore, the consent authority may be satisfied that the Proposal does not result in an intolerable level risk and complies with the applicable risk criteria. For further discussion on hazards and risks, refer to **Section 6.9**.

The Bayside LEP 2021 is the principal guiding EPI relevant to the Site and establishes the key parameters and standards for development. The Proposal's consistency with the applicable pre-conditions under the Bayside LEP 2021 set out below. For a detailed assessment of the Proposal's compliance, refer to the Statutory Compliance Table (**Appendix B**).

Clause 4.6
*Exceptions to
development
standards*

The Concept Masterplan seeks to vary the Height of Buildings development standard for Block 2, 3A and 3B from RL 51m AHD (approx. 47.4m above future ground level) to RL 70m AHD (approx. 66.4m above future ground level) as part of the proposed building envelopes. This represents a 19m (37.25%) variation to the development standard.

In accordance with Clause 4.6 of the Bayside LEP 2021, a Clause 4.6 Variation Request (**Appendix P**) has been prepared and demonstrates that compliance with the Height of Buildings development standard is unreasonable and unnecessary in the circumstances and that there are sufficient environmental planning grounds to justify the contravention.

Clause 5.21
Flood planning

The Site is identified as land within the flood planning area. A Flood Impact Risk Assessment (FIRA) (**Appendix II**) to assess the potential impacts of the Proposal on the flood behaviour of the Site, as well as risks associated with the Proposal as a result of its flood character.

Clause 6.1
Acid sulfate soils

The development land is identified as land containing Class 3 acid sulfate soils. The impacts of this in relation to the proposed Early Works have been addressed in the Acid Sulfate Soils Assessment and Management Plan (ASSMP) (**Appendix KK**). The ASSMP demonstrates that the impacts and risks associated with the presence of acid sulfate soils are capable of being mitigated.

Clause 6.4
*Terrestrial
biodiversity*

The Site contains land identified as containing terrestrial biodiversity. The potential impact of the Proposal on the ecological value and significance of the flora and fauna on the Site, including appropriate measures to avoid, minimise or mitigate these impacts are discussed in the AIA (**Appendix M**) and the BDAR (**Appendix DD**). The AIA and BDAR determine that the potential impacts of the Proposal on terrestrial biodiversity are capable of being mitigated.

Clause 6.5
*Riparian land,
wetlands and
waterways*

The Site is located along the Cooks River, which is identified as a 'Waterway' and 'Stream Order 4' under the Bayside LEP 2021. The impact of the Proposal on the subject matters has been considered as part of the assessment of impacts, outlined in **Section 6.0** and supporting documentation.

<i>Clause 6.7</i> <i>Airspace operations</i>	The Proposal represents ‘controlled activity’ within the meaning of Division 4, Part 12 of the <i>Airports Act 1996</i> . The Applicant seeks a controlled activity approval in accordance with the <i>Airports (Protection of Airspace) Regulations 2026</i> . Refer to Section 6.4 and Aeronautical Impact Assessment (Appendix S).
<i>Clause 6.11</i> <i>Essential services</i>	The Proposal demonstrates that adequate service connections and capacity can be delivered to support the Proposal. For further discussion, refer to Section 3.3.2 and Section 6.20 .
<i>Clause 6.18</i> <i>Development of certain land at Cooks Cove</i>	Clause 6.18 of the Bayside LEP 2021 applies to the Site, requiring the preparation of a site-specific DCP prior to development consent being granted, unless the development is considered minor in nature and consistent with the zone objectives. In accordance with Section 4.23(2) of the EP&A Act, the SSDA represents a Concept DA comprising a Concept Masterplan and therefore satisfies the requirement for the preparation of a site-specific DCP under Clause 6.18 of the Bayside LEP 2021. The SSDA addresses all matters under Subclause 3 under the Concept Masterplan through accompanying Urban Design Guidelines (Appendix L) and technical assessment including mitigation measures. Therefore, the consent authority may be satisfied that the SSDA satisfies the requirements of Clause 6.18, enabling development consent to be granted for development on the Site.
<i>Clause 6.19</i> <i>Development in areas of activity hazard risk</i>	The Site is identified as including the High Pressure Gas Pipeline Risk Area. The Proposal is accompanied by a PHA (Appendix Y) which confirms that the relevant risk criteria is satisfied based on the risks generated by gas pipelines and associated infrastructure near the Proposal, as well as the proposed land uses. Therefore, the Planning Secretary and consent authority may be satisfied that the Proposal does not result in an intolerable level risk and complies with the applicable risk criteria. For further discussion on hazards and risks, refer to Section 6.9.
<i>Clause 6.20</i> <i>Development of certain land at 19A Marsh Street, Arncliffe</i>	The Concept Masterplan seeks consent for the maximum permissible GFA on Lot 100 DP1231954 (19A Marsh Street). As outlined in Section 3.2.4, the supporting Indicative Reference Schemes demonstrate achievement of the maximum permissible GFA. The assessment of likely impacts as a result of the Proposal demonstrates that the maximum permissible GFA will not have any unacceptable impact on the environment and is consistent with the previous Planning Proposal (PP-2022-1748). For further discussion, refer to Section 6.0 and support documentation.

4.5 Mandatory Matters for Consideration

The matters that the consent authority is required to consider in deciding whether to grant consent to any DA are identified and considered in **Table 18** below.

Table 18 *Mandatory Matters for Consideration*

Legislation	Assessment
<i>Environmental Planning and Assessment Act 1979</i>	Section 1.3 of the EP&A Act establishes the objects of the Act. The Proposal is consistent with the objects of the EP&A Act for the following reasons: It will increase the economic and social welfare of the Bayside LGA and State by supporting between 1,750 to 2,890 direct ongoing full-time jobs and between \$470 million and \$630 million in direct value-add each year once complete and fully occupied;

- It will facilitate the ecologically sustainable development of the Site, with economic, environmental and social considerations integrated into the Proposal;
- It constitutes the orderly and economic development of the Site, to meet the demand for industrial and employment floor space in proximity to a key trade and logistics gateway, the Sydney International Airport.
- It promotes good design, with the layout, landscaping, built form and external façade of the Proposal presenting a resolved solution that will contribute to the creation of amenity;
- It will promote the proper construction and maintenance of buildings within the precinct, creating a high-quality precinct for future tenants, workers and visitors; and
- It has provided and will continue to provide the opportunity for the local community and stakeholders to participate in consultation of the development.

Section 4.15 of the EP&A Act requires the consent authority to take into consideration a number of matters in determining a Development Application. For further discussion, refer to the Statutory Compliance Table (**Appendix B**).

Section 4.23 allows the approval of a concept development application to fulfil the requirement for a site-specific DCP required for the Site under Clause 6.18 of the Bayside LEP 2021. The Concept Masterplan seeks to satisfy the requirements for this site-specific DCP under this section.

*State Environmental
Planning Policy
(Planning Systems) 2021*

Section 2.10 of the Planning Systems SEPP outlines that Development Controls Plans do not apply to SSD. As such the *Bayside Development Control Plan 2022* does not apply.

Notwithstanding this, Section 4.23 of the EP&A Act allows the approval of a concept development application to fulfil the requirement for a site-specific DCP required for the Site under Clause 6.18 of the Bayside LEP 2021. The Concept Masterplan seeks to satisfy the requirements for this site-specific DCP under this section.

*State Environmental
Planning Policy (Industry
and Employment) 2021*

Chapter 3 of *State Environmental Planning Policy (Industry and Employment) 2021* (Industry and Employment SEPP) establishes planning controls for advertising and signage. Section 3.6 of the Industry and Employment SEPP stipulates that a consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied that:

- The signage is consistent with the objectives of the SEPP; and
- The signage satisfies the assessment criteria specified in Schedule 1 of the SEPP.

The Concept Masterplan does not seek consent for the display of signage. However, it does seek consent for the *Advertising structures* use on Block 1 where the relevant provisions of Chapter 3 of the Industry and Employment SEPP will apply to a future Detailed DA. The Concept Masterplan seeks to establish key parameters for the signage under the proposed Urban Design Guidelines (**Appendix L**), with consideration towards the relevant provisions of the Industry and Employment SEPP provided in the Statutory Compliance Table (**Appendix B**).

It is noted that supporting and ancillary business identification and wayfinding signage will be considered against the relevant provisions of the Industry and Employment SEPP as part of future Detailed DAs.

*State Environmental
Planning Policy
(Resilience and Hazards)
2021*

Chapter 3 of the Resilience and Hazards SEPP applies to development which falls under the policy's definition of 'potentially hazardous industry' or 'potentially offensive industry'. Section 3.12 stipulates that the consent authority must consider matters relating to potentially hazardous and offensive development for the purpose of industry or storage.

The proposal is not classified as a 'potential hazardous industry' or 'potentially offensive industry'.

*Bayside Local
Environmental Plan
2021*

The Bayside LEP 2021 is the principal guiding EPI relevant to the Site and establishes the key parameters and standards for development. The Proposal's consistency with the relevant mandatory matters for consideration under the Bayside LEP 2021 is set out below. For a detailed assessment of the Proposal's compliance, refer to the Statutory Compliance Table (**Appendix B**).

*Clause 2.3
Zone Objectives and
Land Use Table*

The Proposal is consistent with the objectives of the SP2 Infrastructure, SP4 Enterprise, RE1 Public Recreation and C2 Environmental Conservation zones. Refer to the Statutory Compliance Table (**Appendix B**).

*Clause 4.3
Height of buildings*

The proposal seeks variation to the maximum permitted height of buildings for Blocks 2, 3A and 3B which propose an additional height of RL 70m AHD. A Clause

	4.6 Variation Request (Appendix P) has been prepared which provides justification of the proposed variation to this development standard.
<i>Clause 4.4</i> <i>Floor Space Ratio</i>	A maximum Floor Space Ratio (FSR) of 1.25:1 applies to land on Lot 31 DP 1231486 only. The Proposal is consistent with this standard, with a maximum GFA of 3,250m ² (Floor Space Ratio of 1.25:1) on Lot 31 DP1231486.
<i>Clause 6.10</i> <i>Design Excellence</i>	The Concept Masterplan and supporting Indicative Reference Schemes demonstrate that the future development is capable of achieving design excellence through the implementation of the Urban Design Guidelines at Appendix L .

5.0 Stakeholder Engagement

This section describes consultation undertaken and feedback received prior to the lodgement of the EIS for the Proposal and engagement to be carried out following lodgement of the EIS. An Engagement Report has been prepared by Colliers Urban Planning and is included at **Appendix Q**, supported by a Stakeholder Engagement Table at **Appendix C**.

5.1 Engagement Carried Out

5.1.1 Identified Stakeholders

A comprehensive list of community members and stakeholders to be consulted during the preparation of the EIS process was developed through:

- The identification of neighbours who would be impacted by the proposal unless mitigation measures were implemented,
- The identification of stakeholders who would have a particular interest in the proposal.
- The identification of stakeholders who would have information of value to the proposal, for example, Aboriginal groups with cultural knowledge relating to the site.
- Consultation with the DPHI. This included the community members and stakeholders listed in the proposals SEARs that the applicant was required to consult with.

5.1.2 Consultation Methods

As detailed in the Engagement Report (**Appendix Q**) of the EIS, a range of consultation methods were used to engage stakeholders. This included activities completed prior to lodgement, through the preparation of the EIS and associated technical studies. The consultation methods are detailed in **Table 19** below.

Table 19 Consultation Methods

Activity	Targeted Stakeholder	Purpose
Collateral		
Project launch event and media release	• Media	In-person announcement of the joint venture partnership and the project, including project vision. Promoted balanced media coverage and ensured Stockland was offered opportunities to comment where appropriate.
Notification Newsletter (October 2025) – letterbox drop and email outreach	• Local residents and businesses • Local community stakeholders and neighbouring landowners	4-page A4 graphic newsletter providing detailed information about the External Roadworks DA and an introductory overview of the Concept Masterplan and Early Works SSDA. Ensured neighbouring residents and key community stakeholders who are most interested and impacted were made aware of the External Roadworks DA, Concept Masterplan and Early Works SSDA, that project information was accessible and easy to understand, and recipients had the opportunity to sign-up for project updates, or ask questions via project enquiry channels.
Project Update Newsletter (November 2025) – letterbox drop and email outreach	• Local residents and businesses • Local community stakeholders and neighbouring landowners	2-page A4 graphic newsletter providing an update on the External Roadworks DA and further information about the Concept Masterplan and Early Works SSDA and inviting participation in engagement activities. Ensured neighbouring residents and key community stakeholders who are most interested and impacted were made aware of the Concept Masterplan and Early Works SSDA, that project information was accessible and easy to understand, and recipients had the opportunity to attend an engagement activity, provide feedback or ask questions via project enquiry channels.

Activity	Targeted Stakeholder	Purpose
Community website	All Stakeholders	Dedicated community website with project overview, information about the planning process and upcoming engagement opportunities/enquiry channels. Informed the community and stakeholders about the project, status, engagement opportunities, and directed to public feedback and enquiry channels.
Information display boards	Drop-in session attendees	Large A0 sized boards providing an overview of the proposal and key information of interest to local residents and businesses, in a highly visual format. Provided a visual aid to stakeholders and the community during in-person drop-in sessions, to facilitate meaningful feedback.
Activities		
Social Impact Assessment (SIA) survey	- Local residents and businesses - Local community stakeholders and neighbouring landowners	Online survey of nearby residents, businesses and landholders seeking feedback on what they perceive to be the potential positive and negative social impacts generated by the proposal. Provided an outlet for stakeholders to give feedback on potential positive and negative social impacts generated by the proposal, beyond those immediately impacted by the Concept Masterplan and Early Works SSDA.
Drop-in sessions	- Local residents and businesses - Local community stakeholders and neighbouring landowners	Two, 2-hour in-person information sessions on 25/11/25 and 27/11/25 at the adjacent Rowers on Cooks River for community members to drop-in at a convenient time to learn about the Concept Masterplan and Early Works SSDA, meet the project team and have discussions face-to-face. Offered an in-person alternative for local community members to meet the project team and have one-on-one conversations about the issues they care about most. Team members took notes on the key issues and questions that were raised to inform this Report
Frontline Engagement	All Stakeholders	Established a project enquiry 1800 number (1800 870 549) and established a new email address (consultation.urbanplanning@colliers.com) and enquiry database for community members and stakeholders, and monitored and responded to enquiries up until lodgement. Provided all stakeholders a direct point of contact for any enquiries or to provide feedback, and assisted them in understanding the Concept Masterplan and Early Works SSDA.
Stakeholder Briefings	- Government Agencies - Elected representatives	Invited Government agencies and elected representatives and authorities to meet with the project team to learn about the Concept Masterplan and Early Works SSDA, provide feedback and ask questions Created an open dialogue between stakeholders and the Applicant, facilitating questions and feedback to support preparation of the Concept Masterplan and Early Works SSDA.

This approach follows the *Undertaking Engagement Guidelines for State Significant Projects* (DPHI, 2024) by:

- Engaging with relevant NSW Government agencies, service providers, Council, close neighbours and targeted members of the community who are most likely impacted or interested in the proposal;
- Informing the surrounding community to the site about the proposal and providing opportunities to engage directly with the project team;
- Explaining how community feedback will be considered and documented;
- Providing relevant information in plain English so that potential impacts and implications can be understood; and
- Providing channels of communication to gather feedback.

5.1.3 **Aboriginal Community Consultation**

Consultation was undertaken with Aboriginal groups during the preparation of the Connection with Country Framework and the Aboriginal Cultural Heritage Assessment Report (ACHAR) (**Appendix EE**).

Aboriginal Cultural Heritage Assessment Report

Consultation was undertaken with Aboriginal groups in accordance with the *Aboriginal Cultural Consultation requirements for Proponents 2010* as part of the ACHAR (**Appendix EE**). This comprised identifying Registered Aboriginal Parties (RAPs) in the local area, issuing project information to each RAP to provide comment on.

A list of known Aboriginal stakeholders in the Bayside LGA was provided by Heritage NSW, who were issued a letter inviting them to register their interest in a process of community consultation and inform the significance of Aboriginal objects and places within the vicinity of the Site. A public notice was also placed in the Illawarra Mercury on 20 October 2025. A total of eleven RAPs registered their interest in the project, including the Metropolitan Local Aboriginal Land Council.

The consultation process allowed RAPs the opportunity to offer input into the regulatory processes, contribute to decision making, provide cultural information and provide comment on draft reporting.

Connecting with Country

The Applicant have engaged Ngurra Advisory to lead the Connecting with Country (CwC) process alongside Bidjigal Traditional Custodians, Elders and Knowledge Holders.

The CWC engagement process involved working closely with elders including Aunty Barb and Aunty Marjorie Simms to ensure Bidjigal values and storytelling are meaningfully embedded into the design of the project. This included multiple engagement sessions held between July and October 2025 including:

- Walks on Country;
- Site visits;
- Yarning sessions; and
- Collaborative workshops.

From this a number of key themes emerged which have been embedded into the design of the Precinct. For further discussion on the CwC framework, refer to **Section 3.2.5** and the Connecting with Country Framework prepared by Ngurra Advisory included at **Appendix K**.

5.2 **Stakeholder Views**

The key issues and matters raised by the community and stakeholders during the preparation of the Scoping Report, SEARs and EIS are outlined in **Table 20** below.

Table 20 Stakeholder Views

Key Issues	Detail	Project Response
Strategic Context		
Project rationale	• Some sentiment that the golf course is underused, and redevelopment of the site is welcome, especially after many years of various schemes being proposed as part of site rezoning.	• The Site has long been identified for trade and technology-related uses due to its proximity to Sydney Airport, Port Botany, and regional road connections. In May 2025, it was rezoned to enable a logistics and employment precinct alongside new publicly accessible open space, including Pemulwuy Park and a continuous foreshore walk along the Cooks River.
Planning Process	• Commentary that the proposed Concept SSDA is generally consistent with the Planning Proposal scheme, with refinements.	• Noted. The SSDA has progressed the Planning Proposal outcomes with refined envelopes, land-use allocations, and impact mitigation strategies.

Key Issues	Detail	Project Response
Proposal and Alternatives Considered		
Project timeline and staging	- Interest in staging details and recognition that staging will allow phased delivery of benefits. - Questions on how construction impacts will be managed and timing post-SEARs and SSDA lodgement. - Interest in detailed staging of development blocks and timing of early works. - Questions regarding construction staging and how impacts will be managed. - Interest in timing of SSDA lodgement.	- Delivery will be staged to coordinate road upgrades, early works and built form, enabling progressive public benefits and employment outcomes. - Construction impacts will be managed via Construction Environmental Management Plans. - Potential staging is set out at Section 3.0 of the Environmental Impact Statement – subject to detailed design, tenant requirements and industry demand. - Staging will sequence works to minimise disruption, with clear community communications prior to each stage. - Construction is planned in stages, with external roadworks expected around mid-2027 to 2028, early works around mid-2028 to mid-2029, and future buildings delivered progressively thereafter, subject to approvals and market demand.
Airport Link	Interest in how a future bridge might affect freight and vehicle movements.	The Applicant supports a future bridge connection to Sydney Airport. However, this is subject to ongoing consultation and is not currently committed. The Applicant is liaising with Sydney Airport to identify suitable collaboration and has prepared a formal submission on the Draft 2045 Airport Masterplan.
Economic, Environmental and Social Impacts		
Building height, bulk and scale	- Questions on maximum building heights. - Desire to understand how bulk and massing will relate to the surrounding context. - Concerns that new buildings may dominate the area and affect existing private domain views. - Comments on visibility of the site from a wide area.	- Proposed building heights range across the site, with a maximum proposed height of RL 70m (indicatively a 6-storey warehouse or up to 19-storey hotel). These heights are expressed as building envelopes, which define maximum dimensions and setbacks for future development which will be designed within the approved envelopes. - The Urban Design Guidelines (Appendix L) require future buildings to incorporate modulation, articulation and landscape buffers to relate sensitively to the local context. - The Concept & Early Works SSDA will establish building envelopes, including heights and setbacks, to ensure development aligns with planning controls and design excellence principles. The height of future buildings will be confirmed as part of future Detailed Development Applications, with all future buildings to be located within the approved building envelopes. - Justification of the proposed height exceedance is within the Clause 4.6 Variation Request (Appendix P), and an assessment is provided at Section 6.1 of the Environmental Impact Statement. - A Visual and View Impact Assessment (Appendix R) has been prepared to provide an assessment of views and sightlines surrounding the Site. It presents viewpoint-based photomontages and mitigation strategies; building envelopes will be calibrated to manage scale, reduce visual bulk, and protect key view corridors where practicable
Design	Positive feedback on the project's consideration of Design Excellence and interest in good design outcomes for the build form.	Design excellence is a key priority for all proposed buildings within the site and will be part of future SSDA's for buildings.

Key Issues	Detail	Project Response
	- Interest in how changes since the previous rezoning have shaped the current design. - Preference for minimal fencing along the foreshore (“no fencing where possible”).	- Following the previous rezoning, refined building envelopes and allocated primary land uses have been determined to ensure the project can respond to future market needs. - Fencing treatments will be addressed in detailed design to prioritise permeability and safety along the Cooks River foreshore link. - A detailed assessment and response to Design Excellence is provided in Section 6.3 of the Environmental Impact Statement which confirms how the development plans to achieve design excellence. In addition to this, the Concept Masterplan is accompanied by Urban Design Guidelines (Appendix L) that will ensure the development achieves a high standard of architectural design.
Traffic and Parking arrangements	- Interest in broader vehicle-movement modelling and outcomes. - Questions on planned road upgrades as part of External Roadworks Development Application (separate to this SSDA), particularly Gertrude Street widening, and impacts on Flora Street and surrounding streets. - Queries about road capacity (e.g., “will Gertrude Street be four lanes?”). - Questions on truck access signage and request for limited access on local streets (“No trucks” on Gertrude Street). - Questions on traffic distribution across major corridors and logistics mix assessment. - Requests for clarity on how construction traffic will be managed and routes. - Strong concerns about existing congestion. - Scepticism about whether proposed External Roadworks redevelopment will improve traffic conditions. - Observations that Western Gertrude Street and Marsh Street are already heavily congested. - Queries about speed bumps being included in the External Roadworks DA.	- A Transport Impact Assessment (Appendix V) includes truck routes and distribution modelling. The predicted traffic generation under the Concept & Early Works SSDA is consistent with the previous Planning Proposal (PP-2022-1748). - The separate External Roadworks DA (DA-2026/50) includes the widening Gertrude Street, improving pedestrian/cycling links, and exiting via an upgraded signalised Flora Street/Marsh Street intersection to streamline movements. The proposed external public road upgrades are consistent with separate executed Voluntary Planning Agreements with TfNSW and Council respectively. - Detailed traffic changes to Gertrude Street, including final lane configurations and traffic calming measures, have been included within the separate External Roadworks DA (DA-2026/50) to Bayside Council. - Heavy vehicles will access via Marsh Street to connect directly to the surrounding regional road network. Signage and restrictions will be coordinated with TfNSW and Council (as the relevant roads authorities). - Corridor distribution and logistics mix have been tested through the Transport Impact Assessment (Appendix V). - A Construction Traffic Management Plan will stage works, manage construction logistics and communicate temporary impacts, consistent with authority requirements.
Pedestrian and vehicular movement and access	- Support for wider footpaths and improved pedestrian-friendly frontages. - Queries about potential removal of traffic lights at Innesdale Street. - Questions about how pedestrian footpath widening will occur. - Concerns about narrow and potentially dangerous pedestrian crossings along the foreshore walkway. - Interest in how any future bridge might change freight and vehicle movements.	- The project will deliver wider footpaths, improved active transport links, and pedestrian-focused frontages along key streets links, ensuring the delivery of this through the Urban Design Guidelines (Appendix L). - The existing Innesdale Road signalised intersection will be removed to optimise movements as part of the separate External Roadworks DA (DA-2026-50). - Footpath widening will be delivered through the separate External Roadworks DA (DA-2026/50) and detailed design, balancing pedestrian safety, landscaping and access needs. - The project will enhance pedestrian connectivity by delivering a revitalised Cooks River foreshore, which will range from 20 to 40 metres in width.

Key Issues	Detail	Project Response
		A bridge link between the site and Sydney Airport is currently not proposed and remains subject to ongoing consultation.
Public transport	Interest in integration of public transport with the future development and requests to fast-track new bus stops on Marsh Street.	The project team has consulted with Council and TfNSW as part of the External Roadworks DA regarding options for improved public transport integration, including new bus stops located on Marsh Street.
Visual impact	- Queries about Visual Impact Assessment methodology and comments expressing a need for high-quality visual assessment and transparency. - Desire to understand how existing private domain views will be affected by the proposal	- A Visual and View Impact Assessment (Appendix R) and solar analysis within the Architectural Design Report (Appendix G) have been completed for the project, with assessment findings to be publicly available as part of the public exhibition process. - The Visual and View Impact Assessment (Appendix R) outlines the methodology, include photomontages from agreed viewpoints, and present likely view changes alongside mitigation strategies to confirm impacts across representative public and private domains. It will also address interface treatments and cumulative visual considerations to ensure a high-quality built form and minimise adverse visual effects.
Landscaping and Ecology	- Positive feedback on retaining fig trees in open space compared to site rezoning Planning Proposal. - Interest in overall tree retention within the new park and pedestrian links from Pemulwuy Park to the foreshore. - Suggestions to relocate fig trees to Pemulwuy Park rather than Kogarah Town Centre. - Questions about survival rates of relocated trees and justification for moving them. - Risks of overshadowing and poor survival prospects for relocated fig trees. - Ecological concerns about turtles, frog ponds, and habitat loss. - Highlighted concerns about impacted ponds.	- Tree retention is being guided by the Arboricultural Impact Assessment (Appendix M), where retention is preferred where trees can be viably integrated into the public domain. Relocation options will be assessed against arboricultural advice, viability and park design objectives. Any relocation would follow best-practice methods to maximise survival; justification will be provided where relocation is necessary. - The project supports delivery of Pemulwuy Park and a continuous foreshore link, with planting and habitat enhancement outlined in landscape plans that will be publicly available as part of the public exhibition process. - Solar analysis and species-appropriate design will inform planting/relocation decisions to support long-term viability. - Biodiversity impacts are assessed in the Biodiversity Development Assessment Report (Appendix DD). Dedicated frog ponds to support the endangered Green Tree Frog are being delivered adjacent to the Site as part of the M6 Stage project, managed by TfNSW. - The Biodiversity Development Assessment Report (Appendix DD) provides suitable measures to mitigate the potential impacts of the development.
Open Space and foreshore access	- Positive sentiment toward foreshore walk and expanded public open space. - Questions on park funding (response: Stockland contribution dedicated to Council). - Narrow and potentially dangerous pedestrian crossings along the foreshore. - Preference for minimal fencing.	- The development will unlock 1 km of foreshore access and enable Pemulwuy Park, including dedication of approximately 1.3 ha of land to Bayside Council to increase park size and improve design. - The future Pemulwuy Park is to be delivered by Bayside Council, with the executed Voluntary Planning Agreement between the Applicant and Bayside Council supporting delivery of the future park. - The conceptual design of the Cooks River foreshore is depicted in the Landscape Design Report (Appendix I). - Noted. A secure building line is required to all logistics/data centre uses. Appropriate interfaces will be delivered to provide security, safe separation of heavy

Key Issues	Detail	Project Response
		vehicles and pedestrian, and pedestrian connections to open space.
Justification and Evaluation of Project as a Whole		
Joint venture partnership	Interest in Stockland's role and historical involvement, and interest in John Boyd Properties' involvement in the project.	- Stockland has formed a Joint Venture (JV) agreement with John Boyd Properties (JBP) to deliver the Kogarah Golf Club Redevelopment following gazettal of the amendments to the Bayside Local Environmental Plan 2021 in May 2025. - Stockland brings over 70 years of experience across residential and commercial property sectors, while John Boyd Properties has a strong legacy in Sydney development. This partnership combines Stockland's and JBP's expertise to enable the effective development and future management of the strategically significant site for a world-class logistics-focused precinct by combining their expertise. It will leverage Stockland's extensive experience in large-scale logistics development and JBP's deep local knowledge and long-term vision for the Site.

5.3 Engagement to be Carried Out

The Applicant is committed to ongoing stakeholder consultation following the submission of the EIS. This includes during public exhibition and assessment of the project, as well as following determination of the SSDA.

Following its submission, the DPHI will exhibit the EIS on the Major Projects NSW Website and invite submissions from government agencies and the public. Once the exhibition period is complete, the DPHI may require the applicant to prepare a Submissions Report in response to issues raised. The Applicant will continue to liaise with the DPHI and stakeholders during the proposal's assessment to address queries that may arise.

6.0 Assessment of Impacts

This section of the report assesses and responds to the environmental impacts of the proposed SSD. It addresses the matters for consideration set out in the SEARs dated 17 June 2026 (see **Appendix A**). The Mitigation Measures proposed to mitigate any environmental impacts are provided at **Appendix E** and complement the findings of this section.

6.1 Building Height and Overshadowing

6.1.1 Building Envelope Height

The proposed envelopes are aligned with the Height of Buildings development standard under Section 4.3 the Bayside LEP 2021, with exception of Block 2, 3A and 3B which seek to enable a height variation from RL 51m AHD up to RL 70m AHD. The proposed height variation represents a 19m (37.25%) variation to the development standard.

Clause 4.6 of the Bayside LEP 2021 enables the consent authority to grant consent for development even though the development contravenes a development standard. Subsequently, a Clause 4.6 Variation Request has been prepared by Colliers Urban Planning and included at **Appendix P**.

The proposed building envelope height is driven by the following key aspects:

1. Achievement of the maximum permissible GFA of 340,000m² on Lot 100 DP1231954, only feasible through 6-storey logistics facilities once necessary loading and service areas are incorporated;
2. Provision of appropriate flexibility in warehouse floor-to-floor heights to accommodate all potential warehouse racking heights and the ability to integrate three (3) levels of car parking on Ground Floor within the warehouses; and
3. Ability to achieve improved built form outcomes, while also achieving the maximum permissible GFA, on Block 2 under the Alternative Uses scheme by enabling more linear tower forms.

The proposed building envelope height will ensure that the capacity of the strategically significant site is maximised and provides necessary flexibility to meet the operational requirements of future tenants, as well as the ability for improved built form outcomes on Block 2 under the Alternative Uses scheme.

The extent of the proposed height variation in the building envelopes is depicted in **Figure 44** and **Figure 45**.

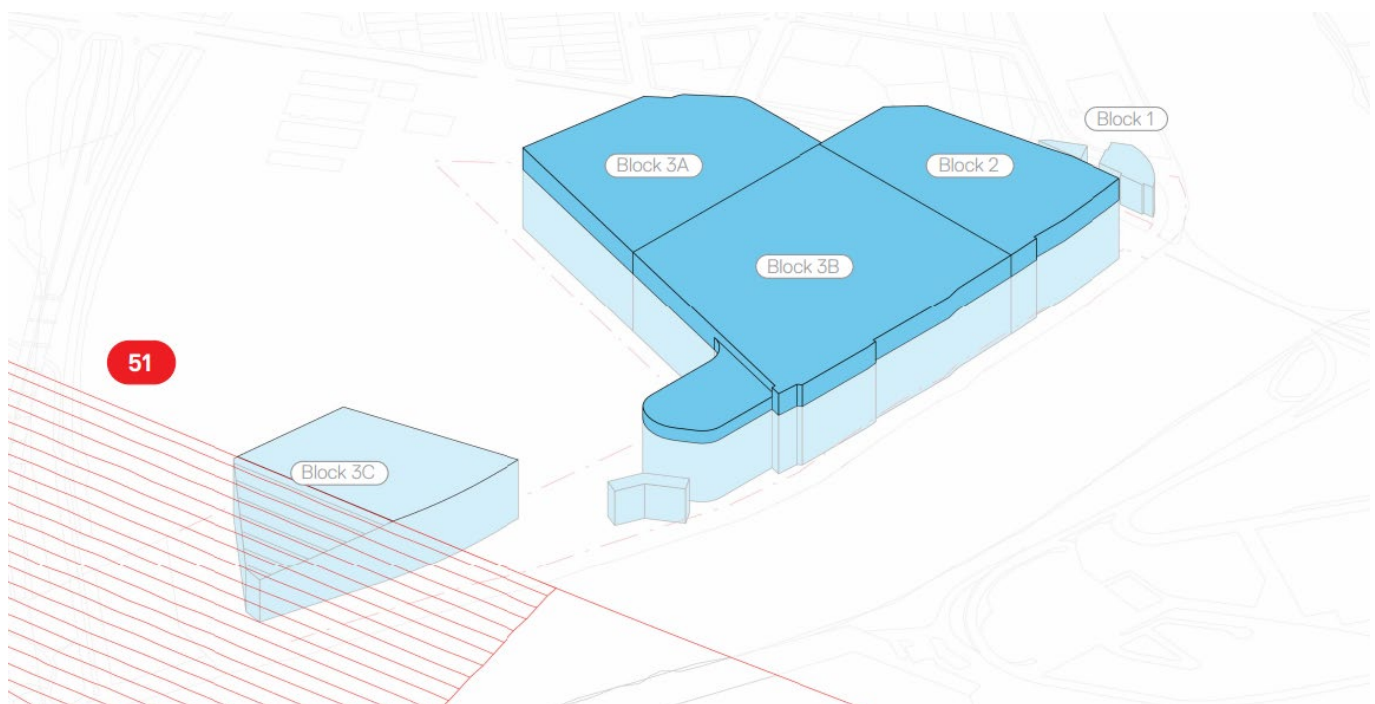


Figure 44 Proposed Height Variation Diagram

Source: Grimshaw

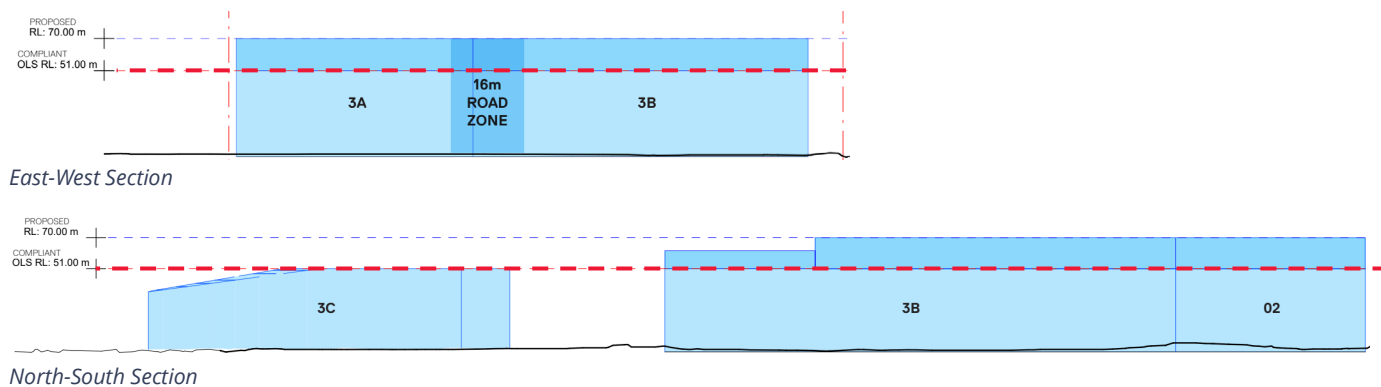


Figure 45 Proposed Height Variation Sections

Source: Grimshaw

For further details on the proposed building envelope height variation, including detailed description, assessment and justification, refer to the Clause 4.6 Variation Request (**Appendix P**).

In summary, the assessment demonstrates that compliance with the Height of Buildings development standard contained in Clause 4.3 of the Bayside LEP 2021 is unreasonable and unnecessary in the circumstances and that there are sufficient environmental planning grounds to justify the contravention. The proposed variation allows for the orderly and economic use of the land in an appropriate manner, whilst also allows for a better outcome in planning terms.

The Clause 4.6 Variation Request (**Appendix P**) demonstrates the following, notwithstanding the non-compliance with the Height of Buildings development standard:

- Compliance with the development standard would be unreasonable and unnecessary, because:
 - It is consistent with the desired future character of the area, where the variation demonstrates airport safeguarding is maintained, which was the basis of the development standard under the previous Planning Proposal (PP-2022-1748);
 - It only results in minor additional visual and view impacts compared to those under a compliant height, with additional impacts to be mitigated through the implementation of built form and urban design measures;
 - It does not result in any additional impacts to loss of privacy or solar access to the existing surrounding development; and
 - It demonstrates appropriate transitions in built form and land use intensity is maintained to the surrounding context.
- There are sufficient environmental planning grounds to justify the contravention, including:
 - It maintains compliance with the maximum permissible GFA on Lot 100 DP1231954 (340,000m²) under Clause 6.20 of the Bayside LEP 2021, including estimated traffic generation that is consistent or less than that assessed under the previous Planning Proposal (PP-2022-1748);
 - It supports reduced vehicle trips on the regional road network and reduced travel distances by realising the maximum permitted GFA, subsequently reducing the reliance on distribution centres in Western Sydney to process freight ultimately bound for Eastern Sydney where homes and jobs are most concentrated;
 - It results in minor/moderate additional overshadowing to the future Pemulwuy Park in mid-winter that will be minimised through the detailed design of future buildings, subject to future Detailed DAs;
 - It demonstrates that airport safeguarding can be suitably achieved and DITRDCA may issue a controlled activity approval;
 - It includes significant economic benefits to the NSW economy through enabling achievement of the maximum permissible GFA, specifically:
 - Delivering critical industrial floorspace in Eastern Sydney on a site with demonstrated capacity for increased intensity and efficiency in close proximity to nationally significant trade gateways;
 - Supporting the creation of an additional 560 new jobs, comprising 220 direct and a 340 indirect FTE jobs; and
 - Generating an additional \$130 million in value per annum, comprising \$70.0 million in direct and a further \$60.0 million in indirect value added.

- It is consistent with the aims of the Bayside LEP 2021, particularly enhancing the function and roles of Sydney Airport and Port Botany;
- It does not restrict achievement of design excellence in accordance with Clause 6.10 of the Bayside LEP 2021; and
- It complies with the objects of the EP&A Act.

Further, it is noted that the Site is highly unique, both in terms of the constraints that require the proposed height exceedance, and the opportunity that the strategically significant site presents. Specifically, it represents a generational opportunity to maximise the capacity and efficiency of a site directly adjacent to Sydney Airport to ultimately support the growth of Sydney Airport and broader projected population growth of Eastern Sydney over the operational lifespan of the development. Considering these factors, the proposed variation does not give precedent to other development which do not comprise these unique elements.

Therefore, the consent authority can be satisfied that the Clause 4.6 Variation Request has demonstrated the matters in Clause 4.6(3) of the Bayside LEP 2021 and may grant development consent notwithstanding the contravention of the Height of Buildings development standard.

6.1.2 Overshadowing

An overshadowing analysis has been prepared for the Proposal and is incorporated within the Architectural Design Report prepared by Grimshaw included at **Appendix G**. The overshadowing analysis have been based on the proposed building envelopes during the June 21 winter solstice and December 21 summer solstice.

To determine the overshadowing impact of the proposed building envelopes, overshadowing analysis from 9am to 3pm on 21 June (winter solstice) and 21 December (summer solstice) has been completed and is presented in **Figure 46** and **Figure 47**. The analysis is based on the proposed building envelopes, providing comparison with a compliant height under the Bayside LEP 2021 (RL 51m AHD), Logistics scheme (Reference Scheme 1) and Alternative Uses scheme (Reference Scheme 4).

This enables an assessment of the proposed height variation and provides important context of the overshadowing impact between the proposed building envelopes which purposefully do not incorporate building articulation, versus the Indicative Reference Schemes which demonstrate suitable building articulation.

The future Pemulwuy Park is located to the south-west of Block 2, 3A and 3B and will subsequently experience minor/moderate additional overshadowing in mid-winter as a result of the proposed building compared to a height compliant scenario. The future Cooks River foreshore link will also experience additional overshadowing, judged to be minor during mid-winter.

A quantitative assessment of the additional overshadowing to the future Pemulwuy Park as a result of the proposed height variation is presented in **Table 21**. It compares the proposed building envelopes between a height compliant with the Bayside LEP 2021 (RL 51m AHD) and proposed height variation (RL 70m AHD).

In summary, the proposed height variation is expected to result in 7.2% of additional overshadowing from 9am to 3pm on average in mid-winter. This figure is skewed by greater additional impact between 9am to 10am (9.6% to 14.3% of additional overshadowing), compared to 11am to 3pm (3.7% to 7.1% of additional overshadowing).

Therefore, the additional overshadowing of the future Pemulwuy Park between 9am to 10am in mid-winter is considered moderate, quickly transitioning to minor as a result of the fast-moving winter sun. The additional overshadowing during mid-winter is considered acceptable on the basis that it's the worst-case scenario and measures are implemented during the future detailed design of Block 2, 3A and 3B (subject to future Detailed DAs).

The proposed building envelopes do not incorporate building articulation to enable future flexibility for functional and quality design outcomes. As identified in **Figure 46** and **Figure 47**, the Indicative Reference Scheme results in notable decreases compared to the proposed building envelope. It is expected that the extent of additional overshadowing is reduced compared to the proposed building envelopes as part of the future Detailed DAs in accordance with the Urban Design Guidelines (**Appendix L**).

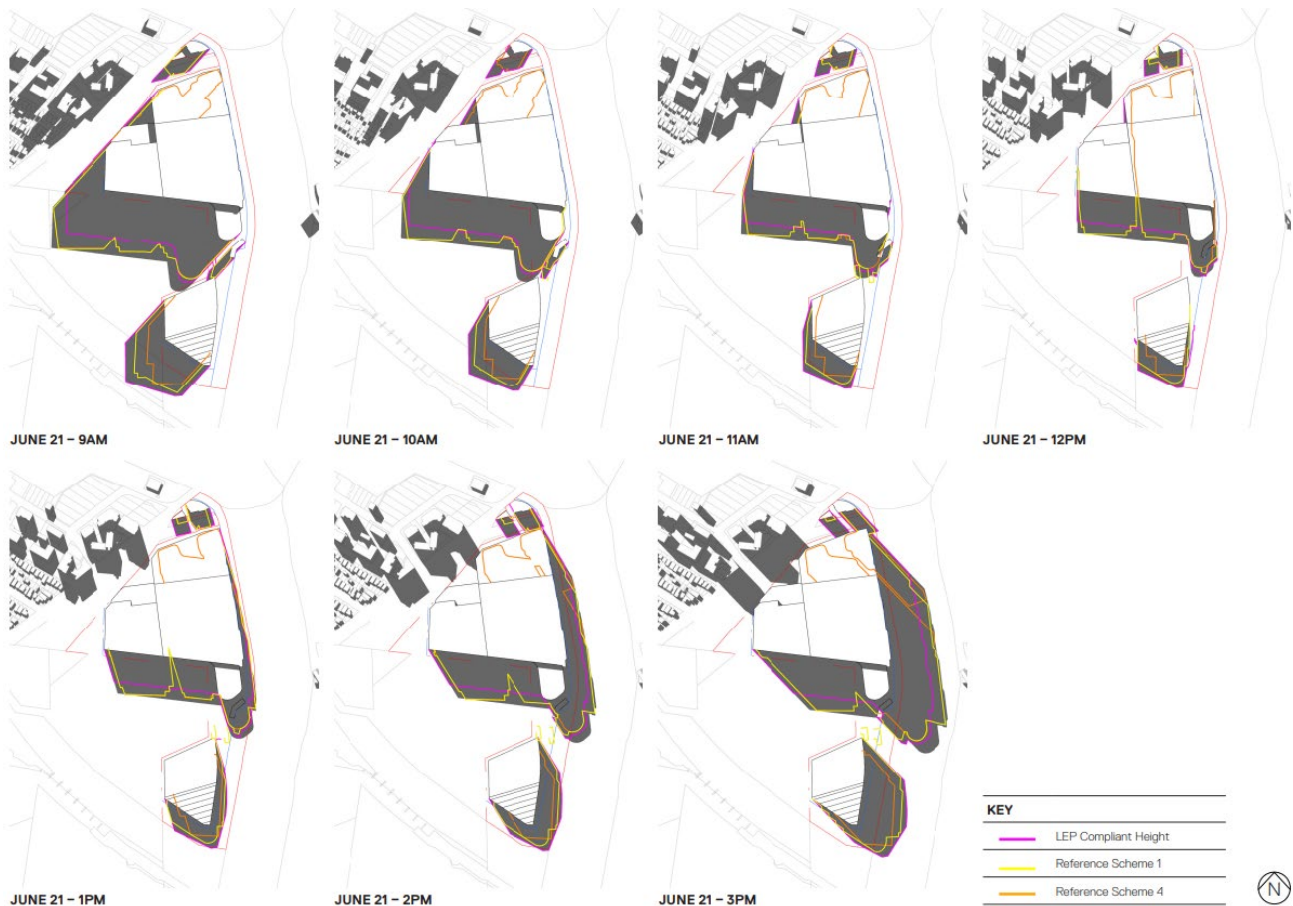


Figure 46 *Overshadowing Analysis – Winter Solstice (21 June)*

Source: Grimshaw



Figure 47 *Overshadowing Analysis – Summer Solstice (21 December)*

Source: Grimshaw

Table 21 *Pemulwuy Park Overshadowing Analysis (Proposed Building Envelopes)*

Time	Winter Solstice		Summer Solstice	
	LEP Compliant Height	Additional Overshadowing	LEP Compliant Height	Additional Overshadowing
9am	32.3%	14.3%	2.3%	0.8%
10am	20.4%	9.6%	1.2%	0.5%
11am	14.3%	7.1%	0.2%	0.3%
12am	12.3%	6.0%	0%	0%
1pm	11.4%	5.2%	0%	0%
2pm	11.6%	4.6%	0%	0%
3pm	12.5%	3.7%	0%	0%
Average	16.4%	7.2%	0.5%	0.2%

Source: Grimshaw

6.2 Visual and View Impact

A Visual and View Impact Assessment (VVIA) has been prepared by Colliers Urban Planning and is included at **Appendix R**. It assesses both the visual impacts from the public domain and view impacts from the private domain, considering the impact of the proposed buildings envelopes under the Concept Masterplan and supporting Indicative Reference Schemes.

6.2.1 Methodology

Separate methodologies have been adopted for the visual impact assessment (from the public domain) and the view loss assessment (from the private domain), summarised in the following subsections.

It is noted that the bulk and scale of the future development has been previously considered as part of the previous Planning Proposal (PP-2022-1748). To determine the extent of additional impact as a result of the proposed height variation, the additional massing above the Height of Buildings development standard has been identified as part of the proposed buildings envelopes in the public and private views. It is noted that the proposed building envelopes only define the maximum building heights and minimum building setbacks, purposefully not incorporating building articulation to enable future flexibility for functional and quality design outcomes in accordance with the Urban Design Guidelines.

The visual and view impact assessment considers the impacts of the Indicative Reference Schemes to determine if the 'proof-of-concepts' within the proposed building envelopes can achieve a suitable built form and urban design outcome. It is reiterated that the Indicative Reference Schemes are indicative only and the development of future built form and publicly accessible open space will be subject to future DAs.

Visual Impact Assessment

The visual impact assessment is based on the principles and broad approaches from relevant industry guidelines. In accordance with the *Guidelines for Landscape and Visual Impact Assessment*, Third edition (Landscape Institute, 2013), the assessment methodology is tailored to the specific requirements of the Proposal, its specific landscape context and its likely significant effects. The methodology involves determining a 'significance of visual impact' rating for each viewpoint, taking into consideration the receptor sensitivity, as well as the magnitude of change.

A total of ten (10) public viewpoints were selected as key locations from which the Proposal would be visible to the general public (refer to **Figure 48**). It includes the incorporation of additional locations in response to feedback provided by Bayside Council. In accordance with the SEARs, the focus of viewpoint selection is based on providing locations which not only assess those visual receptors in close proximity to the Proposal but also establish how the Proposal is absorbed into the surrounding character.



- Viewpoint 01. Cahill Park
- Viewpoint 02A. Marsh Street/Airport Drive bridge
- Viewpoint 02B. Marsh Street/Airport Drive bridge
- Viewpoint 03. Kogarah sporting complex
- Viewpoint 04. Valda Ave
- Viewpoint 05. Kyeemagh Reserve
- Viewpoint 06. Tempe Rec Reserve / Billy's Bridge
- Viewpoint 07. Forest Road
- Viewpoint 08. Princes Highway (bridge)
- Viewpoint 09. Airport Drive

Figure 48 Visual Impact Assessment Viewpoints

Source: Virtual Ideas

View Loss Assessment

View loss assessments are undertaken from nearby private domain views supported by survey accurate 3D imagery. The assessment adopts the planning principle handed down by the NSW Land and Environment Court in *Tenacity Consulting v Warringah Council* [2004] NSWLEC 140 (*Tenacity*).

In *Tenacity*, Senior Commissioner Roseth sets out four (4) steps that must be considered in assessing whether view sharing is reasonable, including:

1. Assessment of the views to be affected;
2. From what part of the property the views are obtained;
3. Assessment of the extent of impact; and
4. Assessment of the reasonableness of the proposal that is causing the impact.

A total of six (6) private viewpoints were selected as key locations from which the Proposal would be visible to surrounding private residents. It includes 20-26 Levey Street, 26-32 Marsh Street, and 36-42 Levey Street located adjacent to the Site.

6.2.2 Assessment of Impacts

Visual Impact Assessment

A summary of the visual impact assessment for each of the selected public viewpoints is provided in **Table 22**, with a detailed assessment and supporting photomontages included within the VVIA (**Appendix R**).

Table 22 *Summary of Visual Impact Assessment*

Viewpoint	Description	Significant of Visual Impact
Viewpoint 1	Cahill Park (Cooks River Cycleway) (Cooks River Cycleway)	Moderate
Viewpoint 2A	Marsh Street / Airport Drive (Giovanni Brunetti Bridge) – looking west south-west	High/Moderate
Viewpoint 2B	Marsh Street / Airport Drive (Giovanni Brunetti Bridge) – looking south-west	Moderate
Viewpoint 3	Barton Park (Field 4)	Moderate
Viewpoint 4	Valda Avenue	Moderate
Viewpoint 5	Kyeemagh Boat Ramp Reserve	Moderate
Viewpoint 6	Tempe Reserve (Tempe Reserve Shared Path)	Moderate
Viewpoint 7	Forest Road	Low
Viewpoint 8	Princess Highway (Bridge)	High
Viewpoint 9	Airport Drive	Moderate

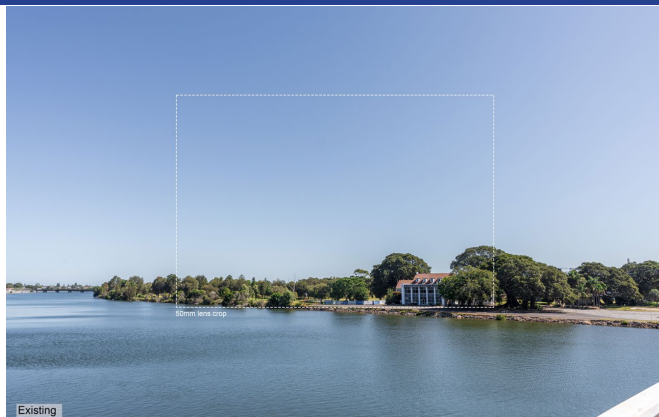
Due to the scale of the Proposal, the magnitude of the visual impact on the public domain in the proposal's visual catchment ranges from considerable to dominant. There is no difference in the visual sensitivity of receptors due to the additional allowable building height sought under SSDA, which is assessed as low to medium. Therefore, the significance of the Proposal's visual impact ranges from moderate to high. Notably, the additional allowable building height sought under the Proposal does not trigger an increase in the significance of the visual impact.

A comparison of the most notable public views most impacted by the proposed height variation and supporting Indicative Reference Schemes are provided in **Table 23**. It includes consideration towards future surrounding context of the area, with the maximum building height permitted to the north of Marsh Street depicted in Viewpoint 5 at the height compliant massing render.

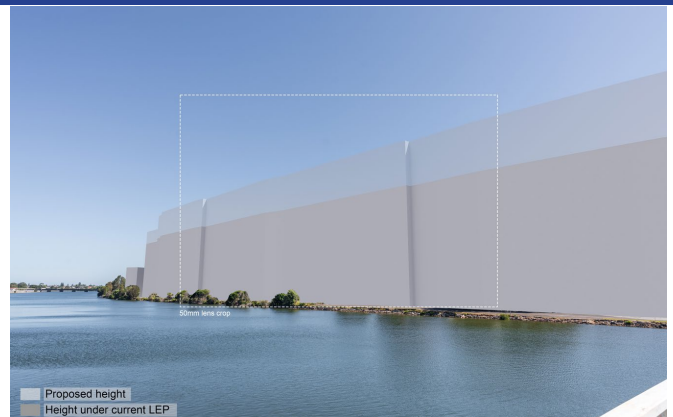
This takes into account the future context of the surrounding area being zoned for high density residential, demonstrating the Proposal will not be visible in the context of the permitted height and FSR controls for the site. Detailed analysis of all viewpoints for the supporting Indicative Reference Schemes is provided at **Appendix R**.

Table 23 Key Public Views – Visual Impact Assessment

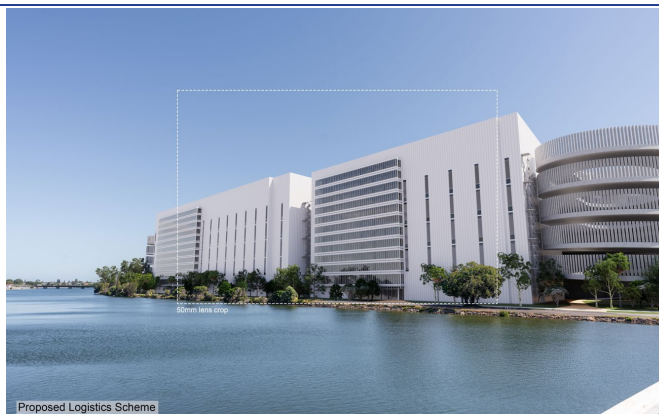
Viewpoint 2A – Marsh Street / Airport Drive (Giovanni Brunetti Bridge)



Existing



Proposed Envelope



Logistics Scheme



Alternative Uses Scheme

Viewpoint 4 – Valda Avenue



Existing



Proposed Envelope



Height Compliant Massing – Bayside LEP 2021

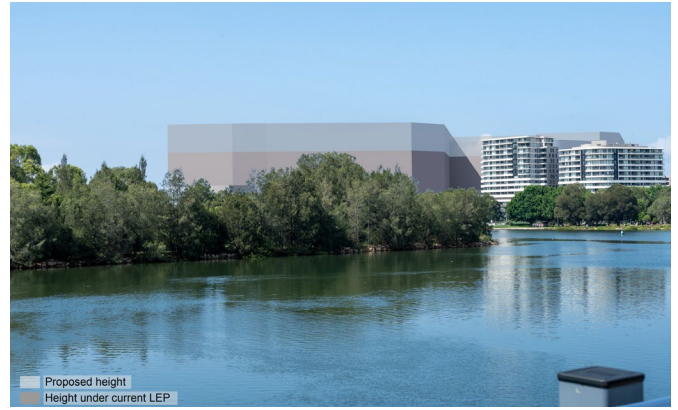


Logistics Scheme

Viewpoint 8 – Princess Highway (Bridge)



Existing



Proposed Envelope



Logistics Scheme



Alternative Uses Scheme

Viewpoint 9 – Airport Drive



Existing



Proposed Envelope



Logistics Scheme



Alternative Uses Scheme

Source: Virtual Ideas

View Loss Assessment

A summary of the view loss assessments for each of the selected private viewpoints is provided in **Table 24**, with a detailed assessment and supporting photomontages included within the VIA (**Appendix R**).

Table 24 *Summary of View Loss Assessment*

Viewpoint	Description	Planning Proposal	Concept SSDA	Greater height	Change
1	26 Levey Street (Southbank Building C), top floor, looking north-east	Severe	Severe	Minor	No
2	26 Levey Street (Southbank Building C), top floor, looking east south-east	Severe	Severe	Minor	No
3	26 Levey Street (Southbank Building C), top floor, looking east south-east	Severe	Severe	Minor	No
4	26-32 Marsh Street, top floor, looking east	Severe	Severe	Minor	No
5	26-32 Marsh Street, top floor, looking south-east	Severe	Severe	Minor	No
6	36-42 Levey Street, top floor, looking east south-east	Severe	Severe	Minor	No

The Proposal achieves skilful design as understood by *Tenacity Consulting v Waringah [2004] NSWLEC 140* through the incorporation of a range of sitting, scale, and form and massing measures. These include retention of the approved distribution of developable and high-quality open space areas including creation of Pemulwuy Park and Cooks River foreshore, setbacks from Marsh Street, and variation in building height and massing. As such, and while acknowledging the extent of view impact enabled by the approved Planning Proposal (PP-2022-1748), the view impact of the proposal is considered acceptable, and view sharing reasonable.

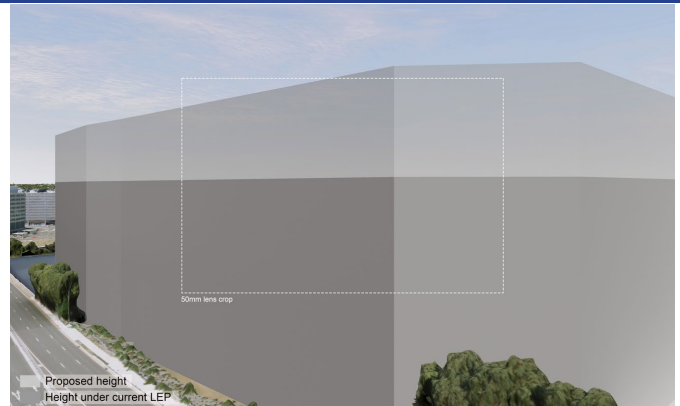
A comparison of the relevant private views most impacted by the proposed height variation and supporting Indicative Reference Schemes are provided in **Table 25**.

Table 25 Key Private Views – View Impact Assessment

Viewpoint 2 – 26 Levey Street (Southbank Building C), top floor, balcony edge, looking south-east



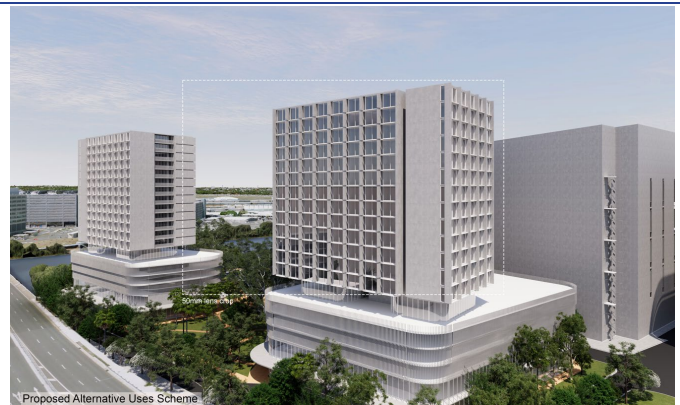
Existing



Proposed Envelope

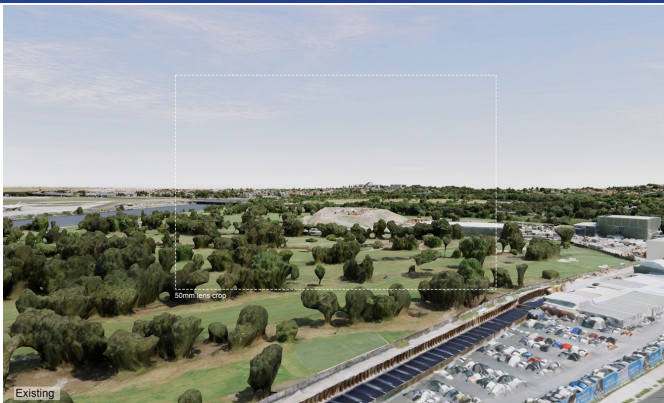


Logistics Scheme

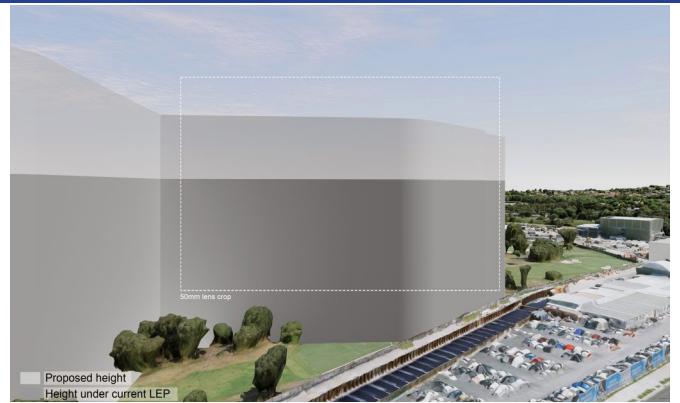


Alternative Uses Scheme

Viewpoint 3 – 26 Levey Street (Southbank Building C), top floor, balcony edge, looking south



Existing



Proposed Envelope



Logistics Scheme

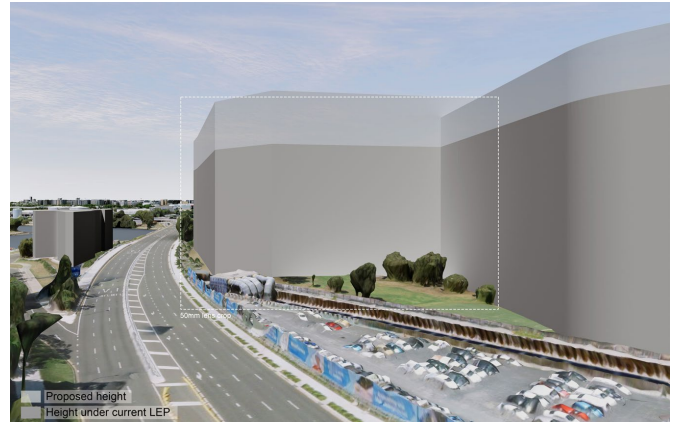


Alternative Uses Scheme

Viewpoint 4 – 26-32 Marsh Street, top floor, balcony edge, looking east



Existing



Proposed Envelope

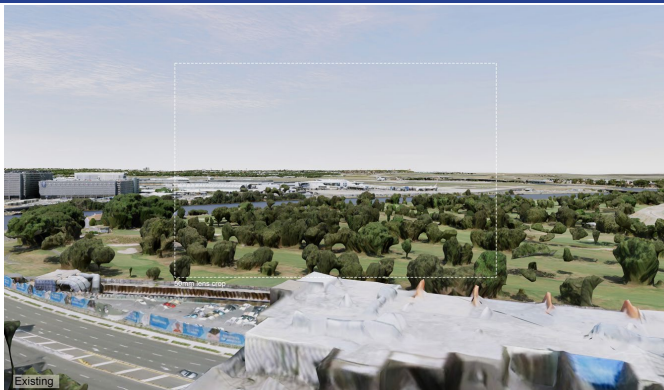


Logistics Scheme

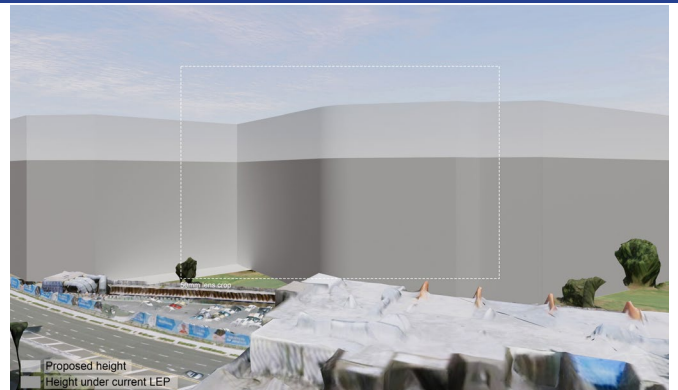


Alternative Uses Scheme

Viewpoint 6 – 36-42 Levey Street, top floor, balcony edge, looking east south-east



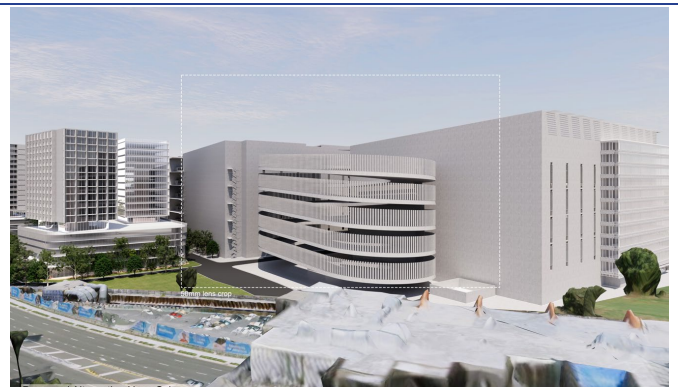
Existing



Proposed Envelope



Logistics Scheme



Alternative Uses Scheme

Source: Virtual Ideas

In summary, the visual and view impact assessment determines that the proposed height variation will result in minor additional impacts to surrounding public and private views. It found that primary design measures relating to siting, scale, and form and massing adequately mitigate the visual and view impact of the Indicative Reference Scheme, including the proposed height variation.

As such, additional fundamental or large-scale mitigation measures were not considered necessary. To further assist in ensuring acceptable visual and view impact, Urban Design Guidelines have been prepared to provide performance-based provisions such as objectives and supporting measurable guidelines that seek to implement the primary design measures.

While acknowledging that the Proposal will have a minor additional visual and view impact, because of the proposed height variation, on the balance of relevant considerations this impact is considered acceptable. As such, it is the conclusion of the visual and view impact assessment that the Proposal can be supported on visual and view impact grounds

6.2.3 Mitigation Measures

The Proposal has incorporated design features into the building envelope and landscaping to mitigate visual impacts. These include but are not limited to, the creation of public domain spaces comprising high quality landscaping, opening of the foreshore and enhancements to the quality of the Cooks River to enable public access, activation of streetscape, building separation, and articulation of facades. The Urban Design Guidelines (**Appendix L**) have also been prepared to guide the detailed design of the precinct and achieve a design which enhances surrounding public and private views.

The incorporation of these mitigation measures have been critical to the determination of acceptable visual impact. On this basis, it is not considered necessary to make further fundamental or otherwise large-scale amendments to the proposal in its current form to satisfactorily manage visual impact. The loss of private views is considered to be mitigated through the creation of new open space and river foreshore access which establishes new publicly accessible vantage points of the Cooks River, responding to the loss of private views.

To further assist in ensuring acceptable visual and view impact, it is recommended that as part of any future planning process consideration be given to preparing, adopting and implementing a Design Guide that provides performance-based provisions such as objectives and supporting measurable provisions such as controls that seek to implement the noted primary measures.

6.3 Design Excellence

The developable area of the Site is identified on the Design Excellence Map under Bayside LEP 2021. Therefore, the provisions of Clause 6.10 of the Bayside LEP 2021 apply to development involving the erection of a new building or external alterations to an existing building within the developable area.

This SSDA for the proposed Concept Masterplan and Early Works does not involve the erection of a new building or external alterations to an existing building within the developable area. Therefore, the provisions of Clause 6.10 of the Bayside LEP 2021 do not apply to this SSDA but will apply to future Detailed DAs.

The relevant matters under Clause 6.10 of the Bayside LEP 2021 in relation to future Detailed DAs are discussed in the following subsections.

6.3.1 Competitive Design Process Requirement

The Concept Masterplan supports building heights greater than 40m, requiring a competitive design process to be held prior to the relevant future Detailed DAs in accordance with Clause 6.10(5) of the Bayside LEP 2021. On 30 June 2025, the Applicant requested that the Government Architect NSW (GANSW) waive the requirement for a Design Competition associated with the future Building 3A Detailed SSDA (SSD-84608232) in accordance with Clause 6.10(6)(a).

This request was made on the basis that Building 3A represents a highly functional and specialised multi-level logistics facility that must meet tenant requirements as a first principle. It is considered that a design review panel process is the most suitable strategy in achieving design excellence for highly functional and specialised multi-level logistics facilities in accordance with Clause 6.10(4) of the Bayside LEP 2021.

Specifically, a design review panel process is considered the most suitable strategy for the following reasons:

- It allows for design optionality to be explored in a unique scenario which requires technical input to ensure a highly functional layout for efficiency purposes;
- It provides necessary flexibility for design changes which may be required at various stages following the securement of pre-leases with future tenants, where the Applicant will then be required to meet strict delivery deadlines in accordance with executed agreements;
- It provides expert review and recommendations throughout the planning phase; and
- It responds to the insufficient number of specialised logistics architects with the relevant multi-level experience and capabilities to participate in a Design Competition for multiple buildings across the precinct.

On 4 July 2025, GANSW granted a Design Competition exemption in accordance with Clause 6.10(6)(a) of the Bayside LEP 2021, subject to the following conditions:

- Watson Young Architects and Moir Studio are appointed as the Design Team for Building 3A throughout the development process and until completion;
- Grimshaw are appointed to support the Design Team to ensure the design principles of the Concept Masterplan are retained;
- Ngurra Advisory are appointed to support the approach to Connecting with Country framework for the project;
- The development is reviewed by the State Design Review Panel (SDRP) prior to lodgement of the SSDA, with any additional reviews at the discretion of the consent authority; and
- The SDRP is established to satisfy the requirement of a design review panel in accordance with Clause 6.10(6)(b) of the Bayside LEP 2021.

The Applicant intends to satisfy the above requirements as part of the future Building 3A Detailed SSDA (SSD-84608232), with additional requests for the waiving of the Design Competition requirement to be considered in relation to the applicable remaining future development under the Concept Masterplan.

6.3.2 Ability to Achieve Design Excellence

As aforementioned, the design excellence provisions under Clause 6.10 of the Bayside LEP 2021 will apply to future Detailed DAs under the Concept Masterplan that include the erection of a building.

The Concept Masterplan and support Indicative Reference Schemes demonstrate that future compliance with the design excellence criteria can be achieved. An assessment of the Concept Masterplan against the design excellence criteria established under Clause 6.10(4) of the Bayside LEP 2021 is provided in **Table 26** below.

Table 26 Consistency with Design Excellence Matters under Clause 6.10(4) of the Bayside LEP 2021

Requirement	Assessment
(a) whether a high standard of architectural design, materials and detailing appropriate to the building type and location will be achieved	A high standard of architectural design, materials and detailing will be achieved throughout future development through the application of the Urban Design Guidelines which established guidelines for the detailed design of buildings within the precinct relating to materiality, interface and façade design.
(b) whether the form, arrangement and external appearance of the development will improve the quality and amenity of the public domain	The proposed arrangement of blocks and building envelopes within the concept masterplan enables a form and arrangement of the site which protects the amenity of the future Pemulwuy Park and Cooks River foreshore.
(c) whether the development detrimentally impacts on view corridors	An assessment of the proposed development's impact on surrounding view corridors has been provided in the View and Visual Impact Assessment (Appendix R).
(d) the requirements of any development control plan made by the Council and as in force at the commencement of this clause	Future development applications submitted as SSDAs will not be required to consider the DCP. However, any local DAs submitted for the site will demonstrate compliance with the Bayside DCP.
(e) how the development addresses the following matters—	The proposed Concept Masterplan demonstrates suitability of the Site for development into a logistics and mixed use precinct.
(i) the suitability of the land for development	
(ii) existing and proposed uses and use mix	The proposed uses as part of the concept masterplan reference schemes demonstrate how the future development and land use will be compatible with

Requirement	Assessment
	land uses surrounding the site including the Sydney Airport, the future Pemulwuy Park and the M5, M6 and M8 motor operations centres.
<i>(iii) heritage issues and streetscape constraints</i>	The site does not contain any identified heritage items. Additionally, the Indicative Reference Schemes demonstrate how the Concept Masterplan responds to any streetscape constraints at the site.
<i>(iv) the relationship of the development with other development (existing or proposed) on the same site or on neighbouring sites in terms of separation, setbacks, amenity and urban form</i>	The Indicative References Schemes demonstrate how the Concept Masterplan and Urban Design Guidelines will respond to surrounding development through the establishment of appropriate separation, setbacks and built form. The Urban Design Guidelines (Appendix L) provide guidance for the detailed development of the site and demonstrate how the site will achieve a high standard of urban design and amenity outcomes.
<i>(v) bulk, massing and modulation of buildings</i>	The proposed concept masterplan establishes building envelopes for each block within the Precinct which will guide a high standard of bulk, massing and modulation of each building. The Indicative Reference Schemes including the Urban Design Guide demonstrate how massing and modulation of buildings can be achieved through the detailed development of the site.
<i>(vi) street frontage heights</i>	The proposed building envelopes establish appropriate street frontage heights which are demonstrated by the Indicative Reference Schemes provided.
<i>(vii) environmental impacts such as sustainable design, overshadowing, wind and reflectivity</i>	Urban Design Guidelines have been established to implement sustainable design measures and ensure a reasonable amount of solar access is provided to surrounding public open spaces during the detailed design of the development. The proposed Indicative Reference Schemes demonstrate that the wind and reflectivity impacts as a result of the development will be minimal.
<i>(viii) the achievement of the principles of ecologically sustainable development</i>	The Urban Design Guidelines establish objectives and guidelines for the implementation of ESD throughout the detailed design of each building within the precinct.
<i>(ix) pedestrian, cycle, vehicular and service access, circulation and requirements</i>	The Urban Design Guidelines and proposed Indicative Reference Schemes demonstrate how pedestrian, cycle, vehicular, service access and circulation requirements can be achieved at the site.
<i>(x) the impact on, and any proposed improvements to, the public domain</i>	The Concept Masterplan includes a range of proposed public domain improvements including the Cooks River foreshore upgrades and Figtree Plaza. Urban Design Guidelines have been established to guide the design of each of these public open spaces. The proposed Indicative Reference Schemes demonstrate how a high standard of design can be achieved within these spaces.
<i>(xi) achieving appropriate interfaces at ground level between the building and the public domain</i>	The Urban Design Guidelines establish objectives and guidelines for the establishment of appropriate interfaces between buildings and the public domain, demonstrating how this can be achieved in the detailed design of each building.
<i>(xii) excellence and integration of landscape design.</i>	Comprehensive reference landscape masterplans have been established for the precinct at Appendix J which demonstrate how a high standard of landscape design can be intergraded into the designed design of the site.

6.4 Airport Safeguarding

An Aeronautical Impact Assessment (AIA) has been prepared by Strategic Airspace and is provided at **Appendix S**. It is supported by a Wind Shear & Turbulence Assessment prepared by CPP Wind Engineering Consultants included at **Appendix T**. These assessments consider the potential impacts of the Concept Masterplan on the operation of Sydney Airport, identifying any potential impacts and mitigation measures.

6.4.1 Methodology

The AIA provides a high-level assessment of the proposed development and its impact on airspace operations due to the site's immediate proximity to Sydney Airport. The assessment was prepared in accordance with the *National Airports Safeguarding Framework* (NASF), the Sydney Airport and the *Commonwealth Airport (protection of Airspace) Regulations 1996* (APAR) and the *Airports (Protection of Airspace) Regulations 2026* to provide a holistic and comprehensive assessment of the proposed development.

6.4.2 Existing Environment

The Site is located in the north-west quadrant formed by the northern end of the western parallel runway, RWY 16R/34L, and the extended runway centreline west of the short cross runway, RWY 07/25. The closest and most relevant runway ends are the landing thresholds RWY 16R and RWY 07. The site proximity to airport runways at Sydney Airport are shown in **Figure 49** below.

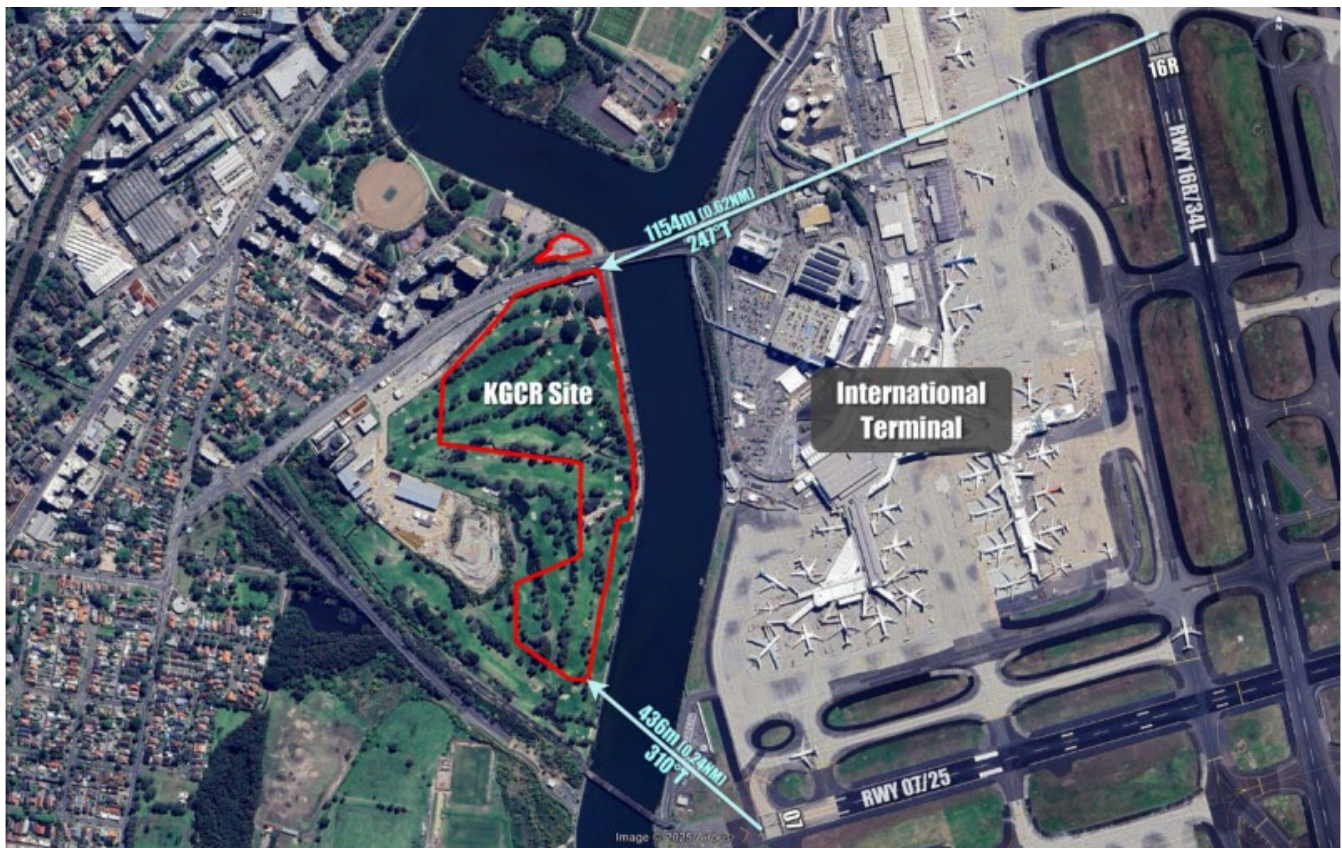


Figure 49 Proximity of Airport Runways to the Site

Source: Strategic Airspace

6.4.3 Assessment of Impacts

Assessment Against the National Airports Safeguarding Framework

An assessment of the proposed development against the NASF has been provided in **Table 27** below.

Table 27 *National Airport Safeguarding Framework Assessment*

Guideline	Impact / Constraint	Assessment
Guideline A <i>Aircraft Noise</i>	95%+ of site: between ANEF 20 & ANEF 25 contours Small portion at the south of the site is between ANEF 25 & ANEF 30	The Site is currently located within the ANEF 20 and ANEF 25 contours. A small portion of Building 3C to the south falls between the ANEF 25 and ANEF 30 contours. The Noise and Vibration Impact Assessment (Appendix W) includes an assessment of aircraft noise levels, establishing internal noise limits for each use proposed. A number of performance criteria are recommended including required aircraft noise reduction measures and minimum glazing specifications. Strategic Airspace concludes that, subject to the implementation of detailed design specifications recommended, the development will comply with the required protections from aircraft noise.
Guideline B <i>Windshear</i>	Within windshear assessment zones for RWY 16R & RWY 07	The Site is located within the windshear and turbulence assessment surfaces for the thresholds of RWYs 07 and 16R. The Wind Shear & Turbulence Assessment (Appendix T) determines that the Logistics Scheme does not exceed the established criteria in published guidelines and therefore does not pose a significant risk on airport operational safety and regulations. Furthermore, the existing wind conditions with no development were tested and no significant deviations were observed when comparing pre- and post-development configurations. On that basis, the Proposal will not have an unacceptable effect on the safety of existing or future air transport operations into or out of Sydney Airport. For further discussion, refer to the following subsections.
Guideline C <i>Wildlife</i>	Within 3km buffer zone (Area A)	The Site is located within the 3km wildlife buffer zone defined by the NASF, an area sensitive to new development and changes in land use which increase the risk of bird strikes on aircraft. Detailed design mitigation measures involving habitat creation and planting along the Cooks River foreshore will require consultation with Sydney Airport to ensure the potential for impacts from wildlife on airport operations is minimised.
Guideline D <i>Wind Turbines</i>	None	Not applicable. The Proposal does not include or relate to wind turbines.
Guideline E <i>Lighting Distraction</i>	Whole site within 6km Assessment Area Southern part of the site subject to specific external lighting control zones.	The Site falls entirely within the 6 km lighting assessment radius of the airport. Internal roads are effectively shielded by the international terminal, apron areas and aircraft parking stands or the proposed buildings. All external lighting at the site will be designed and installed in compliance with the intensity constraints specified for the relevant external lighting control zones. External lighting will not exceed the candela limits when measured at 3° above the horizontal which includes a max candela of 50 for Zone B, 150 for Zone C, and 450 for Zone D.
Guideline F <i>Protected Airspace</i>	Obstacle Limitation Surfaces (OLS) RWY07 Transitional Surface Inner Horizontal Surface. Procedures for Air Navigation Service – Aircraft Operations (PANS-OPS) Varying heights	The Proposal results in the penetration of ‘prescribed airspace’ by 19m for Block 2, 3A and 3B (refer to Figure 51). The Proposal is therefore considered a ‘controlled activity’ under Section 182 of the <i>Airports Act 1996</i> (Airports Act), requiring an approval in accordance with Section 183 of the Airports Act. The Applicant therefore seeks approval in accordance with the <i>Airports (Protection of Airspace) Regulations 2026</i>. A recent redesign of the airspace around the Sydney Basin for the introduction of the Western Sydney International Airport prompted many changes to the procedures for Sydney Airport. An initial assessment of the revised procedures indicates that the protection

Guideline	Impact / Constraint	Assessment
		surface for the 'RNP VNAV PANS-OPS' approach procedure to Runway 16R will be the most restrictive Terminal Instrument Flight Procedure Obstacle Protection (TIFPOP) surface affecting the Site. The lowest TIFPOP comprises a height of RL 70.59m AHD over the south-eastern part of the Site, this surface is marginally above the proposed height variation and may necessitate a temporary height approval for cranes to be used for construction of the upper levels of the Block 3C buildings. It is noted that detailed modelling and verification are currently in progress to confirm full compliance with aviation safety requirements. For further discussion, refer to the following subsections.
Guideline G <i>Communication, Navigation and Surveillance</i>	Outside the predefined Building Restricted Area (BRA) surfaces Within the 1000m runway offset where certain criteria exist	The Site is located outside the Building Restriction Area surfaces, however the guideline outlines that certain development up to 1 km from the runway centreline may be subject to further assessment by Airservices Australia. Given the Site is located entirely within 1 km from the centre line of RWY 07/25, any building with a vertical wall facing the runway exceeding 2,000m² and a height more than 20m above the Localizer ground level will require assessment by Airservices Australia.
Guideline H <i>Strategic Helicopter Landing Sites</i>	None	Not applicable. There are no Strategic Helicopter Landing Sites (SHLS) in the vicinity of the Site.
Guideline I <i>Public Safety Area</i>	None	No impact. Whilst there are currently are no defined Public Safety Areas (PSAs) for Sydney Airport, if one was to apply the PSA criteria used for Western Sydney International Airport to Sydney Airport, the Site would be considered outside (to the north) of a PSA at the western end of the only potentially relevant runway, RWY 07/25.

Wind Shear & Turbulence

Guideline B of the NASF seeks to manage the risk of building generated windshear (i.e. changes in wind speed and/or direction between two points) and building generated turbulence (i.e. rapid irregular changes in wind speed and/or direction at a fixed point) at airports.

A Wind Shear & Turbulence Assessment (**Appendix T**) has been prepared to quantify impact of the Proposal on aircraft operations on Runway 16R at Sydney Airport as a result of wind shear and turbulence. The wind conditions along the approach glideslopes during typical wind conditions were evaluated through wind tunnel testing of a 1:750 length-scale model. The test and surrounds model installed in the wind tunnel are illustrated in **Figure 50** below.

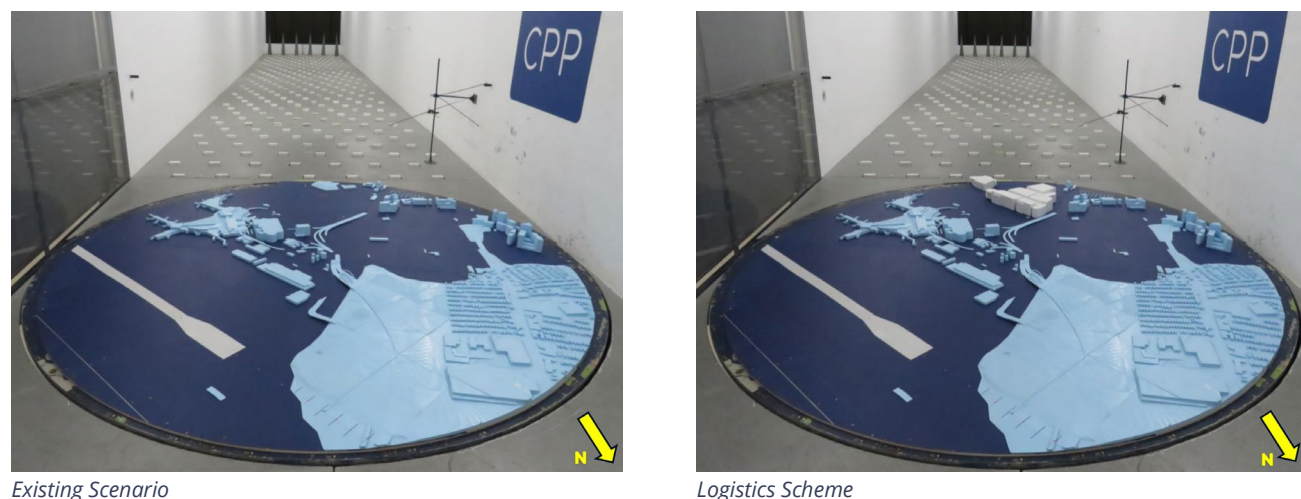


Figure 50 Wind Tunnel Test and Surrounds Model – Runway 16R

Source: CPP Wind Engineering Consultants

A Wind Shear & Turbulence Assessment determines that the Logistics Scheme, representing the proposed height variation, does not exceed the established criteria in published guidelines and therefore does not pose a significant risk on airport operational safety and regulations.

Furthermore, the existing wind conditions with no development were tested and no significant deviations were observed when comparing pre- and post-development configurations. On that basis, the Proposal will not have an unacceptable effect on the safety of existing or future air transport operations into or out of Sydney Airport.

Protected Airspace

Guideline F of the NASF seeks to manage intrusions into the operational airspace of airports by tall structures and minimise risk of activities that could cause air turbulence or the emission of steam, other gas, smoke, dust or other particulate matter. It is noted that the proposed height variation will not have an unacceptable air turbulence impact (as outlined above) and will comprise land uses that will not emit unacceptable particulate matter.

The Height of Buildings development standard is consistent with the Obstacle Limitation Surface (OLS) for Sydney Airport in relation to Block 2, 3A and 3B. Subsequently, the Proposal results in the penetration of 'prescribed airspace' by 19m for Block 2, 3A and 3B (refer to **Figure 51**). The Proposal is therefore considered a 'controlled activity' under Section 182 of the *Airports Act 1996* (Airports Act), requiring an approval in accordance with Section 183 of the Airports Act. The Applicant seeks approval in accordance with the *Airports (Protection of Airspace) Regulations 2026* from the Commonwealth Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (DITRDCA).

The penetration of the OLS is considered supportable on the basis it is below the most constraining of the Procedures for Air Navigation Services – Operations (PANS-OPS) surface overhead and it can be demonstrated that construction equipment (e.g. cranes) and activities will not adversely affect the safety, regularity and efficiency.

A recent redesign of the airspace around the Sydney Basin for the introduction of the Western Sydney International Airport (YSWS) prompted many changes to the procedures for Sydney Kingsford Smith Airport. An initial assessment of the revised procedures indicates that the protection surface for the RNP VNAV PANS-OPS approach procedure to Runway 16R will be the most restrictive Terminal Instrument Flight Procedure Obstacle Protection (TIFPOP) surface affecting the Site.

The lowest TIFPOP comprises a height of RL 70.59m AHD over the south-eastern part of the Site, this surface is marginally above the proposed height variation and may necessitate a temporary height approval for cranes to be used for construction of the upper levels of the Block 3C buildings. It is noted that detailed modelling and verification are currently in progress to confirm full compliance with aviation safety requirements.

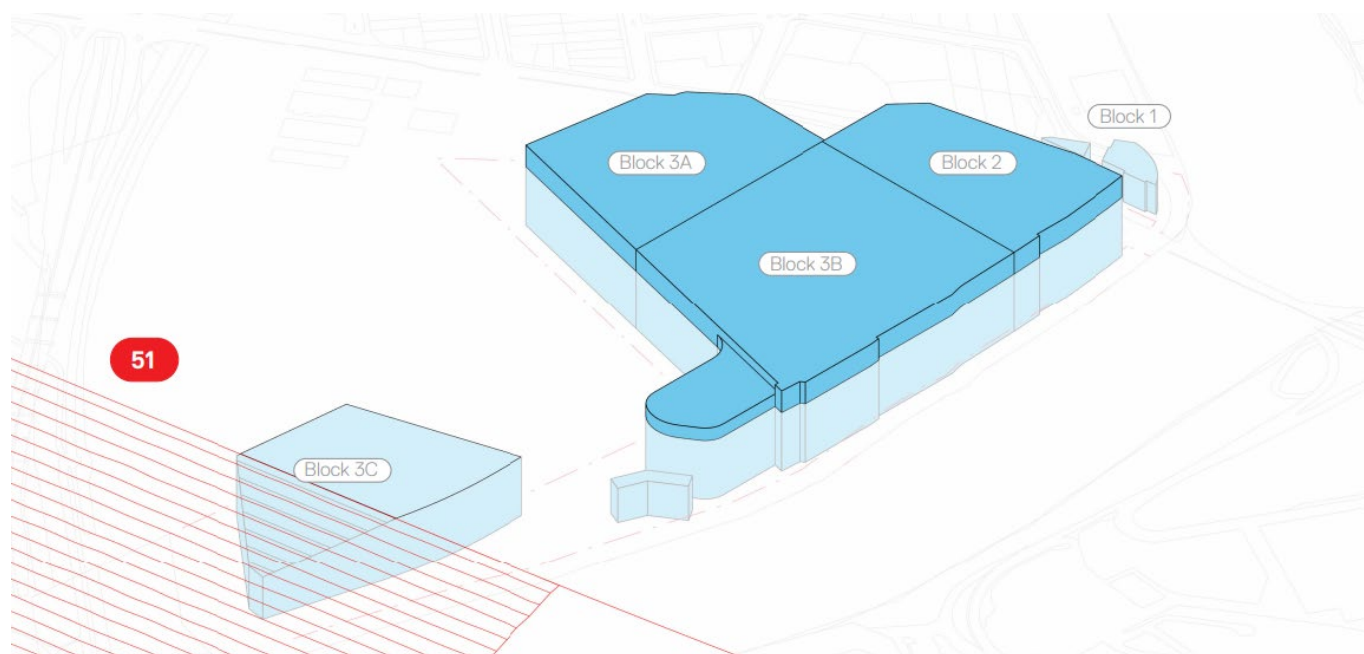


Figure 51 Proposed Height Variation Diagram

Source: Grimshaw

6.4.4 Mitigation Measures

The proposed mitigation measures for airport safeguarding are outlined in **Table 28**. It is noted that impacts discussed as part of this section such as turbulence, lighting, the PANS-OPS predominantly relate to the detailed building design which form part of the detailed mitigation measures of subsequent Detailed DAs.

Table 28 *Mitigation Measures – Airport Safeguarding*

Potential Impact	Mitigation Measure
Penetration of prescribed airspace during construction	A range of construction methods will be utilised to ensure construction does not exceed significantly above the maximum approved heights of each building.
Lighting distractions to pilots	External lighting will not exceed the candela limits when measured at 3° above the horizontal including a max candela of 50 for Zone B, 150 for Zone C, and 450 for Zone D.

6.5 Economic Impact

An Economic Impact Assessment (EIA) has been prepared by Colliers Urban Planning and is included at **Appendix U**. It assesses the expected economic impacts associated with the proposed Concept Masterplan, including the range of land uses proposed and proposed exceedance to the Height of Buildings development standard.

6.5.1 Summary of Economic Impact

The EIA comprises a detailed review of the economic benefits and strategic justification for the Proposal. In summary, the Proposal will have significant economic impacts through the following economic benefits and strategic justification:

- Activate a highly unique and strategic site** – Only four (4) industrial lots with a size above 10 ha are available within the Eastern Harbour City. There are less than 100 industrial lots available across the Eastern Harbour City that exceed 2 ha and as such would be suitable for distribution, multi-storey warehousing, logistics, freight and container handling. At 13.3ha of developable area, the Site represents a rare opportunity to deliver significant benefits to Greater Sydney and the NSW economy. The Site therefore represents one of the most strategic sites within Greater Sydney Region to accommodate industrial uses, particularly with a focus on distribution and logistics.
- Increase economic growth and support employment and economic clusters including Sydney Airport** – The Site is located along the Eastern Economic Corridor which includes Greater Sydney's key trade gateways of Sydney Airport and Port Botany. The Proposal represents a significant capital investment of \$2.0 billion for state-of-the-art facilities that will redefine the logistics landscape in Australia that is directly adjacent to Sydney Airport. It specifically supports the projected growth of Sydney Airport, including forecasted growth in air freight processed from 0.6 million tonnes in 2024 to 1.4 million tonnes in 2045;
- Achieve a higher value and optimised land use outcome** – Higher density industrial developments allow for a greater provision of industrial floorspace, enabling expanded operations and supporting more jobs. In this sense, the employment land is being used more efficiently. The Proposal will set new benchmarks for scale, efficiency, sustainability and innovation. It will enhance the overall efficiency and existing freight network's competitive capabilities to support the continued investment and economic growth of the sector. In addition, it will support a more efficient and reliable freight network by delivering a logistics focused precinct with a maximum GFA up to 343,250m² to the immediate west of Sydney Airport, enabling increased logistics efficiencies through reduced transportation costs and delivery time.
- Rebalance industrial Investment within the Eastern Harbour City** – The Proposal will assist in rebalancing the current spatial misalignment between industrial investment in the Eastern Harbour City and resident and worker growth. Currently, only 10.7% of investment value across Greater Sydney's employment lands is being directed to employment precincts within the Eastern Harbour City. This is despite existing infrastructure and trade gateways within the Eastern Harbour City and with the city projected to accommodate 24.1% of Greater Sydney's resident population growth by 2051. These growth rates also broadly align with growth projected across the Central River City and the Western Parkland City over the same period.
- Industrial Land Supply in the Eastern Harbour City** – Limited investment in employment lands and industrial projects across the Eastern Harbour City is likely being driven by few opportunities for industrial development due to constrained employment land supply, and a lack of adequately sized lots. In this context, unlocking key sites and ensuring flexibility of design and height will be critical to delivering high density employment developments across the

Eastern Harbour City. In this context, the Proposed Development is considered appropriate in terms of leveraging a unique and strategic site that will help to rebalance investment back within the Eastern Harbour City.

- **Deliver strong economic and community benefits** – Including:
 - Support between 1,750 to 2,890 direct ongoing FTE jobs and between \$470 million and \$630 million in direct value-add each year once complete and fully occupied;
 - Support between 2,330 to 3,100 indirect ongoing FTE jobs and between \$420 million and \$590 million in indirect value-add each year once complete and fully occupied;
 - Serve an identified market need in addressing employment lands demand that can be enhanced through multi-level warehousing;
 - Deliver additional employment of +230 industrial jobs and additional +\$70.0 million of value add each year under the proposed height variation (Reference Scheme 1) compared to a compliant development;
 - Deliver on the need to accommodate industrial uses in proximity to trade gateways, freight infrastructure and other employment precincts in a highly accessible and strategic location;
 - Address employment land shortage and scarcity through the delivery of high-density employment generating uses;
 - Support the future expansion of Sydney Airport through the provision of additional distribution, freight and logistics uses, with the proposed alternative uses also complementary to the role and function of Sydney Airport.

6.5.2 Economic Value of Height Variation

As identified in **Section 6.1**, it has been determined through detailed options analysis that the maximum permissible GFA on Lot 100 DP1231954 (340,000m²) cannot be realistically or feasibly achieved within the Height of Buildings development standard. The variation of the Height of Buildings development standard as part of the proposed buildings enables the provision of 6-storey logistics facilities and achievement of 340,000m² for Reference Scheme 1 and 2 (refer to **Table 10**).

For context, Reference Scheme 1 would be restricted to approximately 295,000m² of GFA on Lot 100 DP1231954 if compliance was maintained with the RL 51m AHD height control on Block 2, 3A and 3B. This would represent a shortfall of 45,000m² of GFA that has previously been assessed and determined suitable for the Site. This shortfall represents a significant loss in potential economic value through decreased employment output and generation of economic activity on a highly strategic site adjacent to Sydney Airport and key freight transport corridors.

The economic benefits associated with the proposed height variation can be highlighted using the following direct comparison for Reference Scheme 1 (Logistics scheme):

- **LEP Compliant Height (RL 51m AHD)** – 291,200m² of Logistics GFA; and
- **Proposed Height Variation (RL 70m AHD)** – 336,200m² of Logistics GFA.

A comparison of the economic benefits is presented in **Table 29**, which quantifies the value of the proposed height variation to the NSW economy during operation of the logistics facilities in Reference Scheme 1 (Logistics scheme).

Table 29 Operational Phase Annual Net Uplift (LEP Compliant Height vs Proposed Height Variation)

Phase	Direct	Indirect	Total
LEP Compliant Height – 291,200m² of Logistics GFA			
FTE Employment	1,460	2,190	3,650
Value Added (\$m)	\$440.0	\$400.0	\$840.0
Proposed Height Variation – 336,200m² of Logistics GFA			
FTE Employment	1,680	2,530	4,210
Value Added (\$m)	\$510.0	\$460.0	\$970.0
Net Uplift (Difference)			
FTE Employment	+220	+340	+560 (15.3% Increase)
Value Added (\$m)	+\$70.0	+\$60.0	+\$130.0 (15.4% Increase)

Source: Colliers Urban Planning analysis utilising data from ABS, National Accounts 2020/21 // Note: Figures rounded

The Proposal represents an economic catalyst for the NSW Economy, with the economic impact associated with the proposed height variation considered to be significant and have a meaningful impact on the NSW economy. The failure to facilitate the proposed height variation under the Concept Masterplan would result in a potential operational job and economic value loss of over 15%.

Specifically, compliance with the Height of Buildings development standard would fail to:

- **Support the creation of an additional 560 new jobs**, comprising 220 direct and a further 340 indirect FTE jobs; and
- **Generate an additional \$130 million in value per annum**, comprising \$70.0 million in direct and a further \$60.0 billion in indirect value added.

On this basis, it is demonstrated that the additional environmental impacts associated with the non-compliance are disproportionate to the adverse economic consequences attributable to compliance with the Height of Buildings development standard.

6.6 Traffic and Transport

A Transport Impact Assessment (TIA) has been prepared by JMT Consulting and is included at **Appendix V**. It assesses the anticipated traffic generation, and impacts associated with the Proposal including proposed vehicle site access, internal road networks, parking and infrastructure.

6.6.1 Traffic Impact Assessment

Vehicular Access Strategy

The proposed vehicular access strategy is consistent with previous Planning Proposal (PP-2022-1748) and supporting executed VPAs comprising external road upgrades with TfNSW and Bayside Council respectively. It is summarised as comprising three (3) connection points:

- **Levey Street** – The existing Levey Street under the Giovanni Brunetti Bridge will be retained for access to the Site. Due to the 3.1m height clearance for the bridge, Levey Street will be retained to accommodate passenger vehicles and small to medium size service vehicles.
- **Marsh Street / Gertrude Street** – A new signalised (four way) intersection is proposed at Marsh Street / Gertrude Street which will form the primary access point into the Site. As a result of the signalisation of the Gertrude Street intersection, the Marsh Street / Innesdale Road intersection will revert to a left in–left out arrangement, consistent with previous discussions with TfNSW.
- **Marsh Street / Flora Street** – The existing signalised intersection at Marsh Street / Flora Street will be utilised to provide access into the site as well as the Arncliffe MOC. The intersection layout does not provide for right turns from Marsh Street into the Site, consistent with previous advice provided by TfNSW.

The proposed vehicular access strategy to support the Concept Masterplan is illustrated in **Figure 52**. The external roadworks required to facilitate the proposed access strategy are primarily subject to a separate External Roadworks DA (refer to **Section 1.5.1**), with exception of Item 3 of the Local VPA which forms part of the Early Works subject to this DA (refer to **Section 3.3.2**).

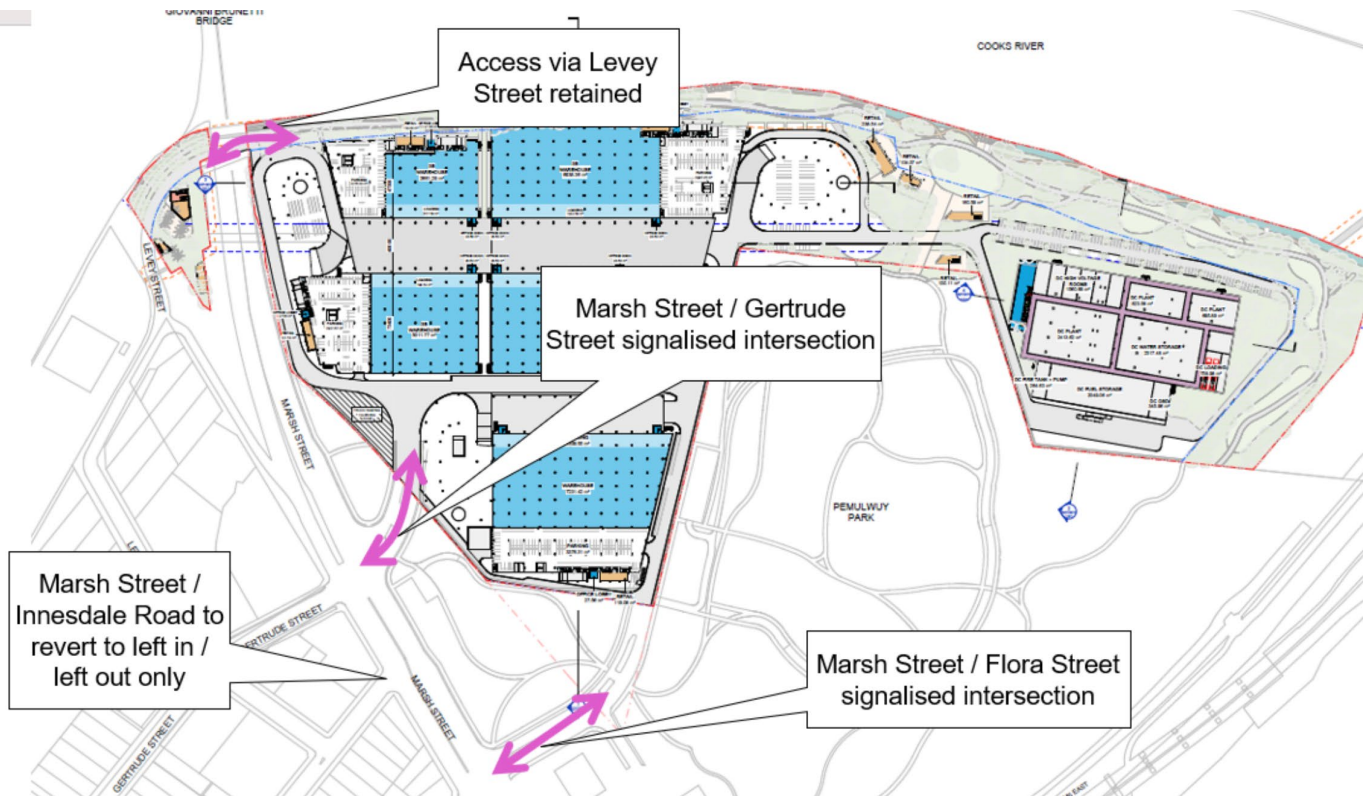


Figure 52 *Proposed Vehicle Site Access Arrangements*

Source: JMT Consulting

Traffic Generation

The traffic generation rates adopted for the Concept Masterplan are consistent with those utilised in the transport impact assessment supporting the previous Planning Proposal. This ensures that a direct like for like comparison can be undertaken to confirm that the scale of uses considered under the Concept Masterplan do not generate traffic at greater levels in comparison to that considered at the time of the detailed traffic modelling supporting the Planning Proposal.

A summary of the peak hour traffic generation forecasts for the Indicative Reference Schemes supporting the Concept Masterplan are indicated in **Figure 53**, compared against those forecast for the reference scheme supporting the previous Planning Proposal.

The analysis confirms that the Indicative Reference Schemes contemplated under the Concept Masterplan would generate fewer traffic movements during peak hours when compared to the reference scheme supporting the previous Planning Proposal. Therefore, the outcomes of the detailed traffic modelling prepared for the Planning Proposal remain valid, with no additional impacts arising from the Concept Masterplan.

It is noted that future Detailed DAs will include an assessment of the expected traffic generation to confirm compliance with the previously modelling. For a detailed description of the traffic modelling completed for the previous Planning Proposal and detailed traffic generation forecasts of the Indicative Reference Scheme, refer to the TIA (**Appendix V**).

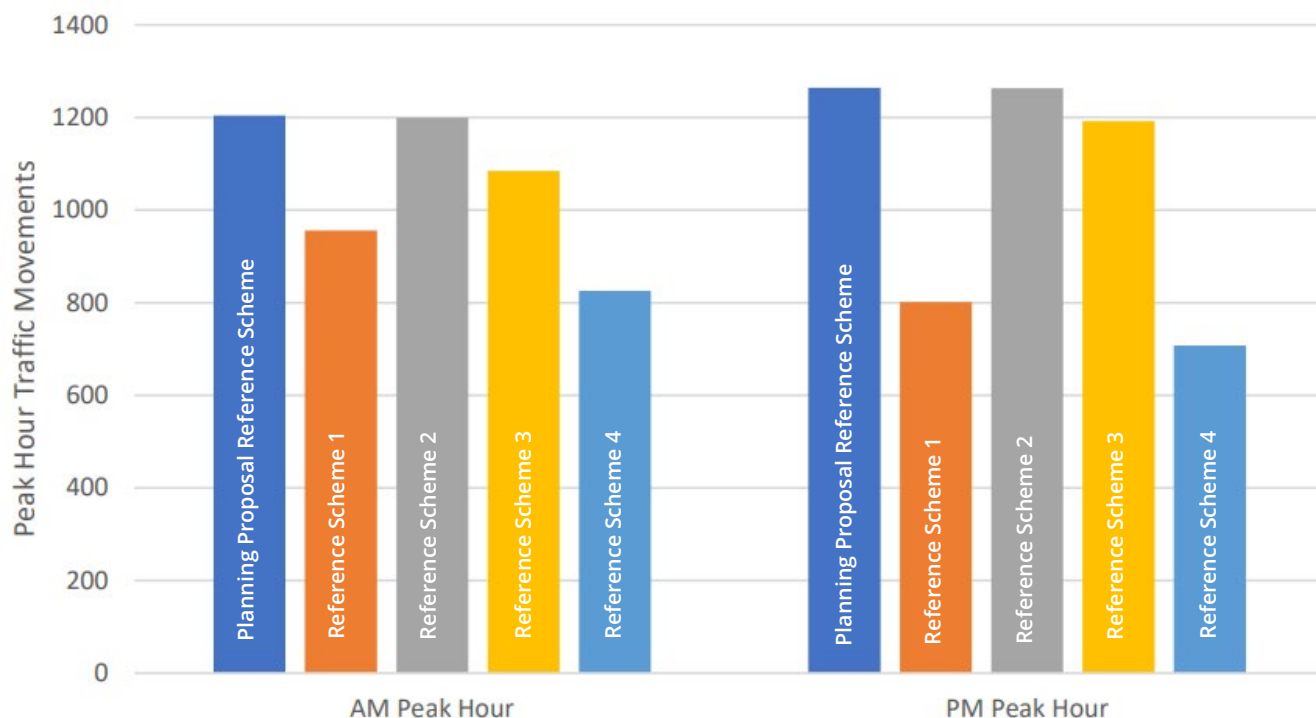


Figure 53 Traffic Generation Comparison

Source: JMT Consulting

6.6.2 Parking

The provision of parking for the future development will be provided in accordance with Section 3.5.3 of the Bayside DCP and the Urban Design Guidelines (**Appendix L**), comprising the following parking rates:

- **Warehouse / Logistics** – 1 space per 300m² GFA plus 1 space per 80m² ancillary office;
- **Hotel** – 1 space per 4 rooms, with two (2) 12.5m long coach pick-up and set-down spaces;
- **Commercial** – 1 space per 80m² GFA (maximum rate);
- **Retail** – 1 space per 40m² GFA; and
- **Supermarket** – 1 space per 25m² GFA (maximum rate).

It is noted that the above parking rates are consistent with those considered under the Planning Proposal (PP-2022-1748).

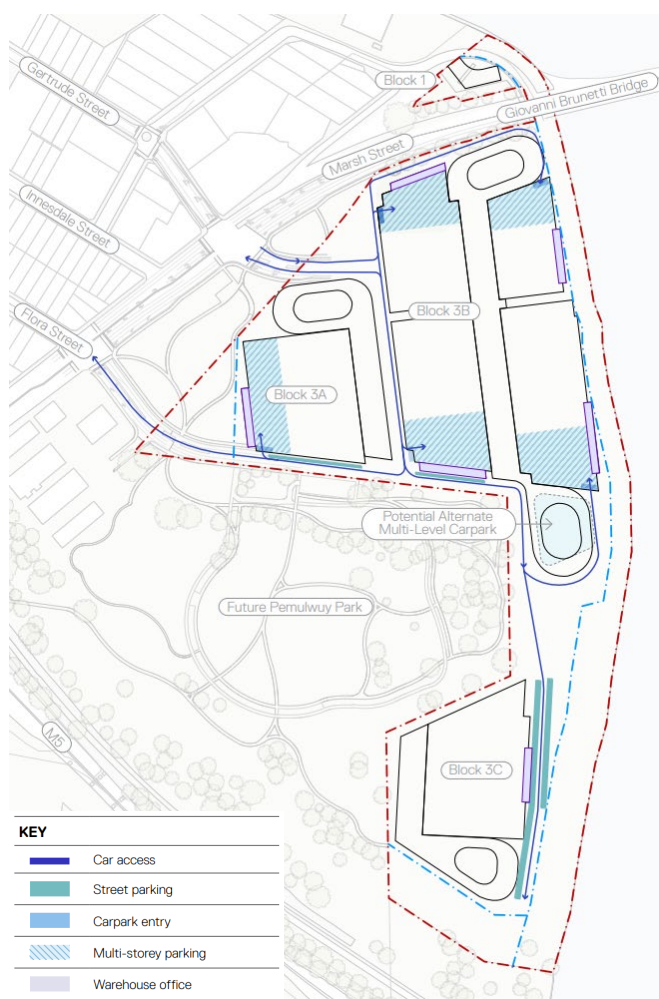
The Indicative Reference Schemes comprise a parking strategy taking into consideration the constraints of the Site and proposed land use. The indicative car parking number associated with each scheme is outlined in **Table 30**, with the indicative locations for car parking identified in **Figure 54**.

The indicative locations for parking include ‘sleeved’ car parking integrated into the ground floor of Block 3A and 3B, comprising 3-levels of parking adjacent to ancillary office areas. The provision of parking for Block 3C is located on-grade along the internal road, while parking for Block 2 is integrated into the podiums of the hotel and office towers.

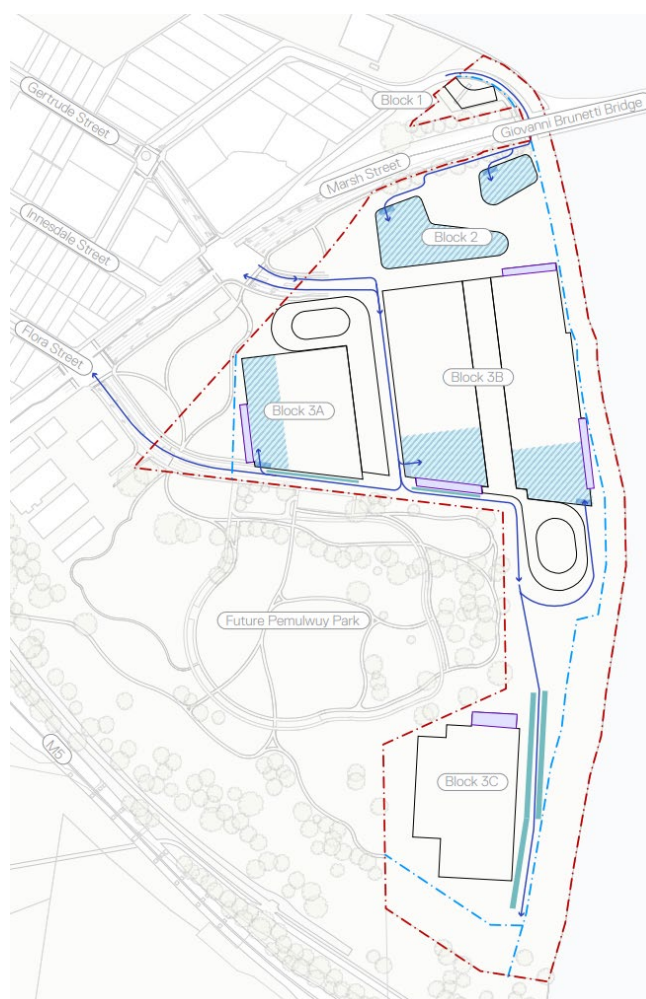
Table 30 Indicative Car Parking Provision – Indicative Reference Schemes

Reference Scheme	Warehouse	Ancil. Office	Office	Retail	Hotel	Data Centre	Total
Reference Scheme 1	1,032	333	39	57	16	-	1,477
Reference Scheme 2	903	276	228	258	91	-	1,756
Reference Scheme 3	842	294	39	54	16	20	1,265
Reference Scheme 4	709	238	266	258	91	20	1,582

Source: Grimshaw



Logistics Scheme



Alternative Uses Scheme

Figure 54 Indicative Car Parking Locations – Indicative Reference Schemes

Source: Grimshaw

Access and Circulation

Internal Access and Vehicle Circulation

Internal access and vehicular circulation within the Site will comprise private internal roads and publicly accessible internal roads. The indicative vehicular circulation for the Indicative Reference Schemes are illustrated in **Figure 55** which demonstrates the applicable layout for the logistics only / data centre schemes and **Figure 56** which indicate the proposed layout for the mixed use schemes.

The TIA considers that the proposed internal street networks provide sufficient capacity to accommodate the traffic generated by the Proposal, including all service and loading vehicle requirements. Sufficient width is provided at intersections for vehicle manoeuvring, including capacity for up to 19m articulated vehicles and semi-trailers, and 26m double vehicles.

Appropriate travel lane widths are provided within the Site to accommodate the movement of both light and heavy vehicles and emergency vehicles including ambulances and specialist fire appliance vehicles.

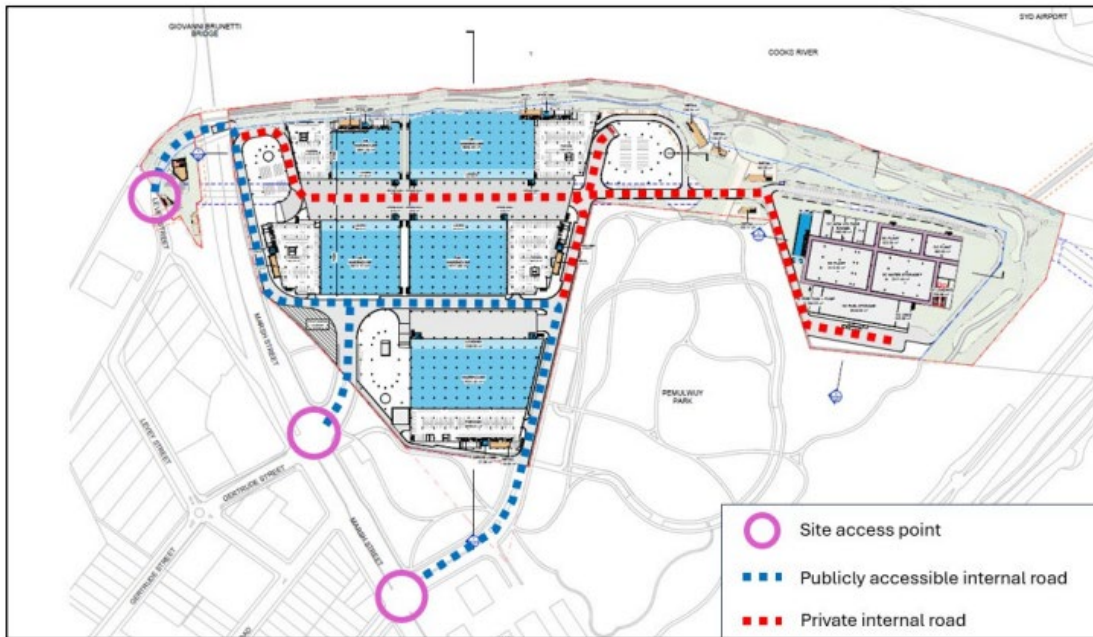


Figure 55 *Internal Access and Vehicle Circulation – Reference Scheme 3*

Source: JMT Consulting

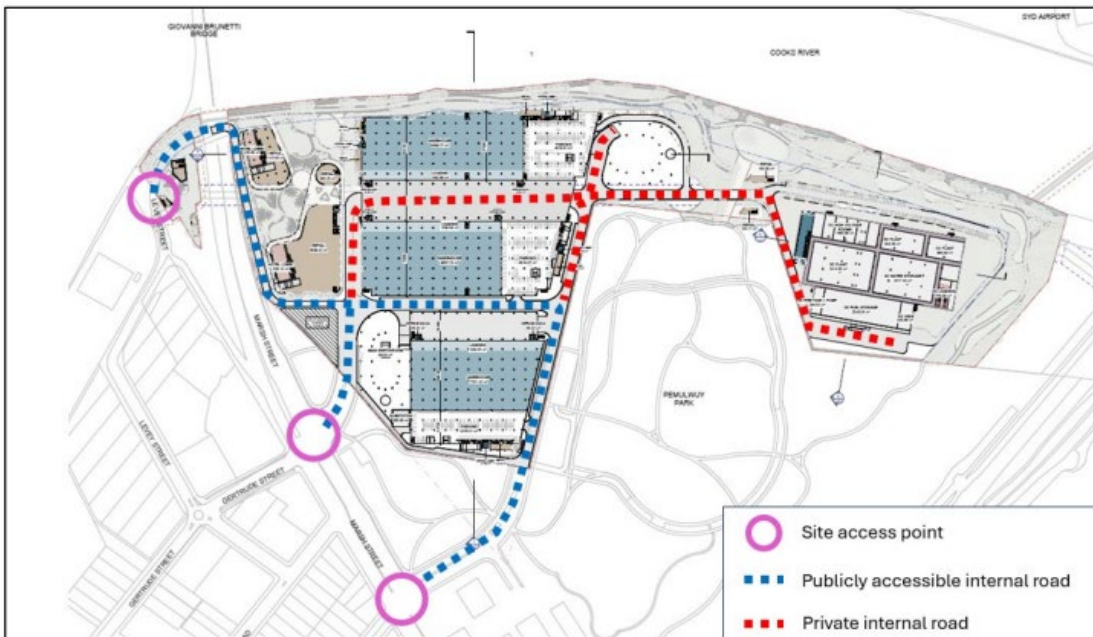


Figure 56 *Internal Access and Vehicle Circulation – Reference Scheme 4*

Source: JMT Consulting

Pedestrian and Cycling Infrastructure

Consistent with pedestrian and cycling initiatives envisaged at the time of the previous Planning Proposal, the following works as part of the Concept Masterplan will improve connections between the Site and surrounding public transport:

- Separated pedestrian and cycle path located parallel to the Cooks River, delivering a missing 900m long x 20 m wide landscaped waterfront contribution to the 'bay to bay' regional active transport link;
- Connection to and embellishment of the new shared path along Marsh Street;
- New pedestrian footpaths on Gertrude Street (between Marsh Street and Levey Street);
- Bicycle parking and end-of-trip facilities, and bicycle infrastructure within the public domain; and
- Supplemented by the new Gertrude Street East extension:
 - Pedestrian crossing on the eastern side of the existing Marsh Street / Flora Street intersection; and
 - Pedestrian crossing on the western side of the future Marsh Street / Gertrude Street intersection.

Public Transport Assessment

Consistent with the agreed works executed under SVPA2024-25, the Proposal will facilitate improvements to existing bus services on Marsh Street through the provision of northbound and southbound bus stops and shelters on Marsh Street to the south of the Marsh Street / Gertrude Street intersection, including recessed bus bay at the southbound bus stop. This will support improved public transport access to the Site and is being delivered as part of the separate External Roadworks DA (refer to **Section 1.5.1**).

6.6.3 Construction Traffic Management

A preliminary Construction Pedestrian Traffic Management Plan (CPTMP) has been prepared by JMT Consulting to consider the potential impacts of the Early Works on the Site's surrounding road context. The preliminary CPTMP is contained within the TIA included at **Appendix V**. The preliminary CPTMP outlines the key principles for how construction may be carried out on the Site, subject to further planning during subsequent stages of the project.

It is noted that prior to the commencement of construction works, a detailed CPTMP will be prepared.

Construction Hours

Consistent with standard Bayside Council guidelines, construction hours for the Proposal will generally comprise:

- Monday to Friday: 7.00am to 6.00pm;
- Saturday: 7.00am to 5.00pm; and
- Sunday / Public holidays: No work.

Construction Vehicles

During construction, a range of vehicles will be utilised, including:

- 18.5m truck and dog vehicles;
- 12.5m heavy rigid vehicles (HRVs);
- 8.8m medium rigid vehicles (MRVs);
- 6.4m small rigid vehicles (SMRs); and
- Small utes and vans.

Construction Vehicle Routes

The proposed construction vehicle access routes have been selected to align with key arterial routes around the Site. Construction vehicle routes will be developed as works progress. All construction vehicles will enter and exit the site along Marsh Street through either the signalised intersection at Flora Street or Gertrude Street as illustrated in **Figure 57** below.

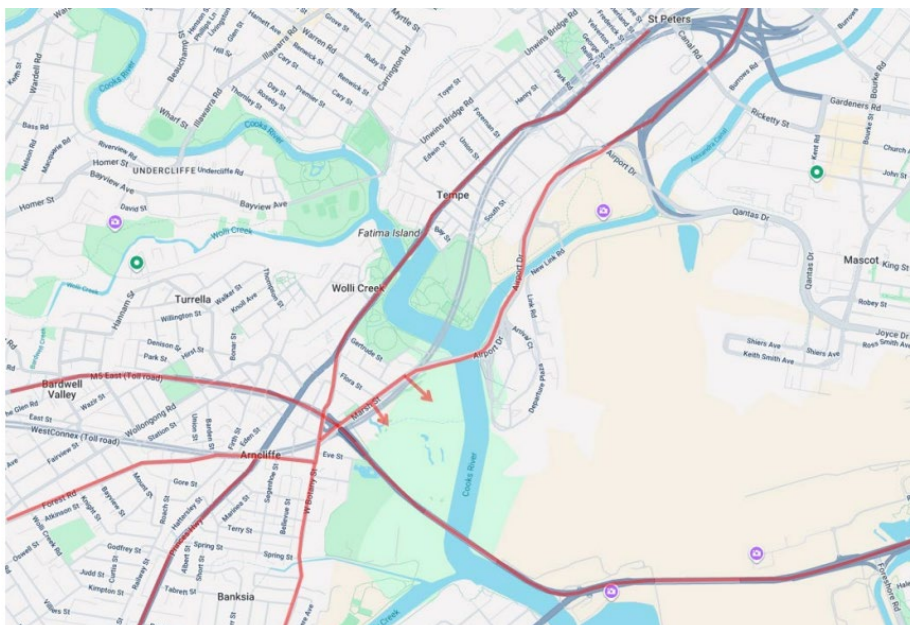


Figure 57 Construction Vehicle Routes

Source: JMT Consulting

Pedestrian Management

Temporary fence and hoardings will be installed along the frontage of the Site to maintain pedestrian movements and ensure pedestrian safety. The Marsh Street footpath will remain open at all times to pedestrians. Traffic controllers will be positioned at vehicle access points to manage interactions between vehicles and pedestrians on adjoining footpaths. Further pedestrian safety management details will be provided as part of the detailed CPTMP prior to commencement of works.

Road Network Impacts

It is not anticipated that construction works will necessitate road closures or occupation of roadways.

Construction Worker Parking

On-site car parking for construction workers will be provided within the Site where possible to minimise the impacts to the surrounding street network. Car parking arrangements will be outlined in a detailed CTMP which will be prepared prior to the commencement of works on the Site.

Cumulative Impacts

A number of other construction projects may be occurring at the same time the proposed construction works, as outlined in **Table 7** at Section 2.4. Reviews of the cumulative heavy vehicle traffic generation and routes will be undertaken at a regularly to minimise cumulative impacts to the road network. Regardless, the proposed construction works at the site are expected to generate a relatively low level of construction vehicle activity which would generally not impact the operation of the surrounding road network from a cumulative perspective.

6.6.4 Mitigation Measures

The proposed mitigation measures in relation to traffic and transport are outlined in **Table 31** below.

Table 31 Mitigation Measures – Traffic and Transport

Potential Impact	Mitigation Measure
Traffic generation from construction activities	• A detailed Construction Traffic Management Plan (CTMP) will be prepared prior to the commencement of construction to provide traffic and pedestrian management measures for the construction phase of the project. It must have regard to the following management measures: - Vehicular access and management: ◦ Trucks to minimise the use local streets for access to the construction Site. ◦ Trucks to enter and exit the Site in a forward direction. ◦ Trucks to not circulate on the road network to wait to enter the Site (unless exceptional circumstances do not permit) ◦ Truck drivers will be advised of the designated truck routes to/from the Site. ◦ Truck loads would be covered during transportation off-Site. ◦ Construction vehicles not to queue on adjacent streets. - Pedestrian access and management ◦ Pedestrians near the ingress/egress points will not be held unnecessarily. ◦ Pedestrian movements adjacent the construction Site will be managed and controlled by site personnel where required. ◦ Pedestrian warning signs and construction safety signs/devices to be utilised in the vicinity of the Site and to be provided in accordance with WorkCover requirements. - Site operations ◦ Construction activity to be carried out in accordance with approved hours of work. ◦ During site induction, workers will be informed of the existing public transport network. ◦ Development and enforcement of driver charter.

6.7 Noise and Vibration

A Noise and Vibration Impact Assessment (NVIA) has been prepared by Pulse White Noise Acoustics (PWNA) and is included at **Appendix W**. It assesses the potential construction and operational noise and vibration impacts associated with the Proposal, identifying the need for any mitigation measures.

6.7.1 Methodology

Construction

The NVIA includes an assessment of construction noise in accordance with the *Interim Construction Noise Guideline* (Department of Environment and Climate Change, 2009) and vibration assessment in accordance with the *Assessing Vibration: A Technical Guideline* (Department of Environment and Conservation, 2006).

Operation

The NVIA has been prepared in accordance with relevant noise legislation and guidelines, including the *Noise Policy for Industry* (NPfI) (NSW EPA). It involved noise monitoring to determine the background noise levels from various locations surrounding the Site, these locations being the 'noise loggers' and 'noise catchment areas' (NCAs) which enable identification of Project Specific Noise Trigger Levels (PSNTLs).

The existing background noise levels identified for the Site were identified through background noise logging undertaken at eight (8) locations, identified in **Figure 58** below. Noise logging was undertaken between 2-14 September 2025 and 20-31 October 2025, with additional noise logging undertaken on 19 March 2026.

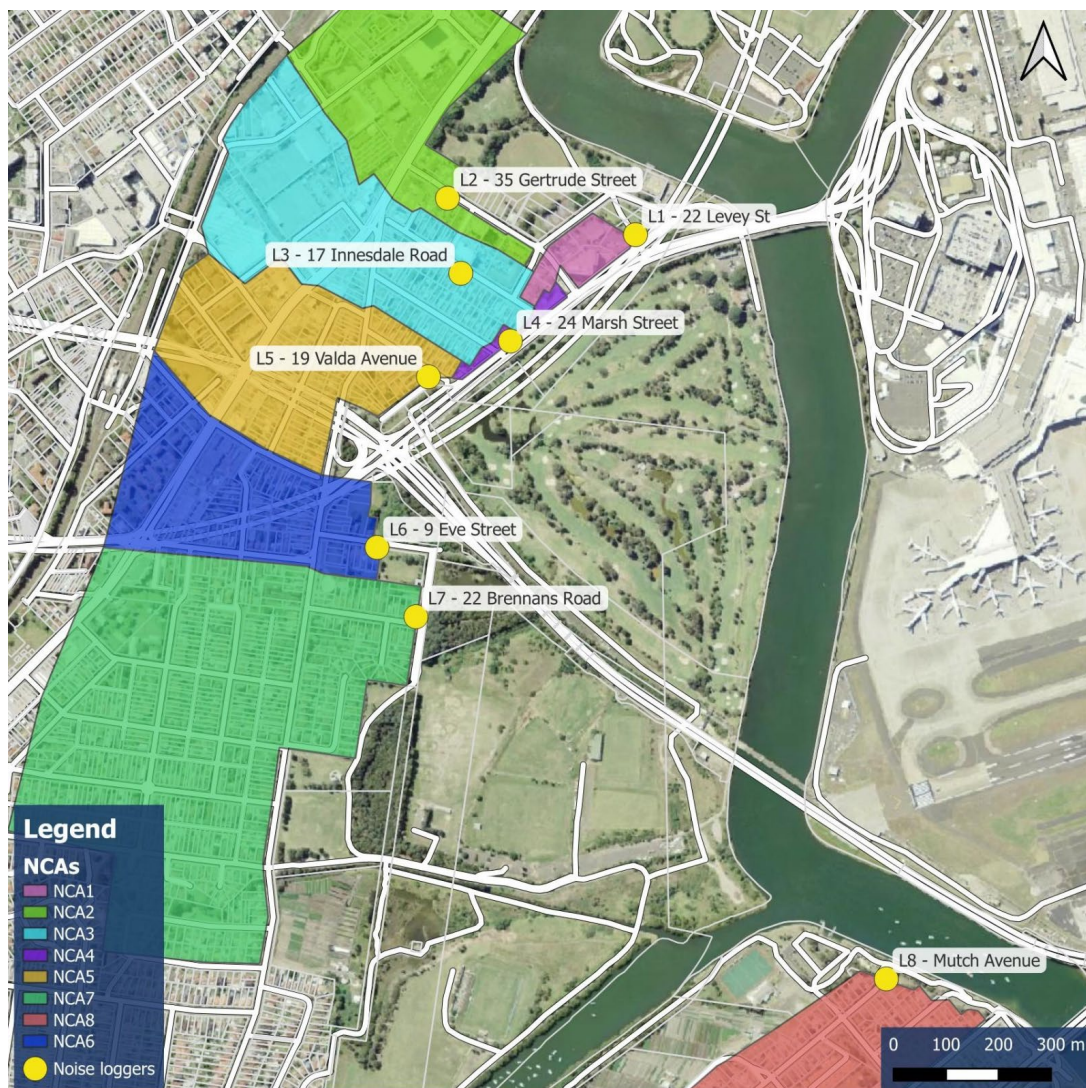


Figure 58 Noise Loggers and Noise Catchment Areas

Source: Pulse White Noise Acoustics

The assessment includes modelling using 3D SoundPLAN modelling generated to show the predicted worst-case 15-minute noise impacts to the nearest sensitive receivers, based on typical industrial activities. For further detail including a breakdown of the noise criteria and noise emission sources, refer to the NVIA at **Appendix W**.

6.7.2 Existing Environment

The Site is located in close proximity to major transport nodes being the Princes Highway, Marsh Street and the M5 Motorway, and Sydney International Airport. As such, the Site's existing noise environment is predominantly characterised by road traffic and aircraft noise.

The nearest sensitive receivers, identified as being the locations representative of the nearest sensitive receivers to the Site for the purposes of construction noise and vibration assessment, are illustrated in **Figure 59** below.



Figure 59 Sensitive Receivers

Source: Pulse White Noise Acoustics

Meteorological Conditions

Meteorological observations during the unattended noise monitoring survey were obtained from the Bureau of Meteorology website. The relevant observations for the Site determined that under the measured conditions, the sensitive receivers were not impacted by noise increased from temperature inversions from the Proposal.

6.7.3 Construction

Construction Noise

The predicted noise levels arising from the assessment assumes that all noise sources are operating simultaneously, at the closest point to the receiver in each case. In practice, this will generally not occur as processes will be either spread over the Site or occur on different days. The predicted noise levels therefore represent the expected worst-case scenario in relation to on-site works. The Proposal will follow standard construction hours comprising:

- Monday to Friday 7am to 6pm;
- Saturday 7am to 5pm; and
- Sunday / Public Holiday No work or ancillary activity.

The construction noise exceedances resulting from the Proposal are set out in **Table 32** below.

Table 32 Construction Noise Impacts

Receiver	Noise Management Level (dB)	Predicted Exceedance (dB)		
		Demolition and Site Clearing	Excavation and Shoring	Site Servicing and Infrastructure
R1 – Residential	67	8	5	-
R2 – Residential	67	5	2	-
R3 – Residential	63	2	-	-
R4 – Residential	69	2	-	-
R5 – Residential	69	-	-	-
R6 – Residential	57	8	5	-
R7 – Residential	69	1	-	-
R8 – Residential	57	4	1	-
R9 – Residential	57	3	-	-
R10 – Residential	69	-	-	-
R11 – Residential	61	1	-	-
R12 – Residential	61	-	-	-
R13 – Residential	58	-	-	-
R14 – Residential	53	4	1	-
R15 – Residential	53	2	-	-
R16 – Residential	59	-	-	-

Source: Pulse White Noise Acoustics

For majority of the time, it is anticipated that noise from the Site would be appreciably lower than the predicted noise levels informing these exceedances. Even in the worst-case scenario and despite predictions for exceedances of up to 8dB, no sensitive receivers have been identified to be highly noise affected by the proposed works.

Construction Vibration

An assessment of the vibration levels expected to be generated during construction has been undertaken based on the estimated levels vibration for the associated construction equipment detailed in **Table 33**. Dependant on the location of the vibration intensive work and size of the equipment, exceedances of the vibration safe working distances are possible at nearby industrial receivers. Residential receivers are very unlikely to exceed the project vibration criteria.

The vibration impacts of the highest generating equipment modelled for the proposed construction works is illustrated in **Figure 60**. Subject to maintaining the safe working distances identified in **Table 33**, the NVIA determines that the proposed works are not expected to have an adverse impact on sensitive uses surrounding the Site.

Table 33 Recommended Safe Working Distances for Vibration Intensive Plan

Plant	Rating / Description	Safe Working Distances	
		Cosmetic Damage	Human Comfort
Vibratory roller	< 50 kN (Typically 1 – 2 tonnes)	5m	15-20m
	< 100 kN (Typically 2 – 4 tonnes)	6m	20m
Small hydraulic hammer	300 kg, typically 5 – 12 tonnes excavator	2m	7m
Medium hydraulic hammer	900 kg, typically 12 – 18 tonnes excavator	7m	23m
Large hydraulic hammer	1600 kg, typically 18 – 34 tonnes excavator	22m	73m
Vibratory pile driver	Sheet piles	2-20m	20m
Jackhammer	Hand held	1m	Avoid contact with structure and steel reinforcements

Source: Pulse White Noise Acoustics

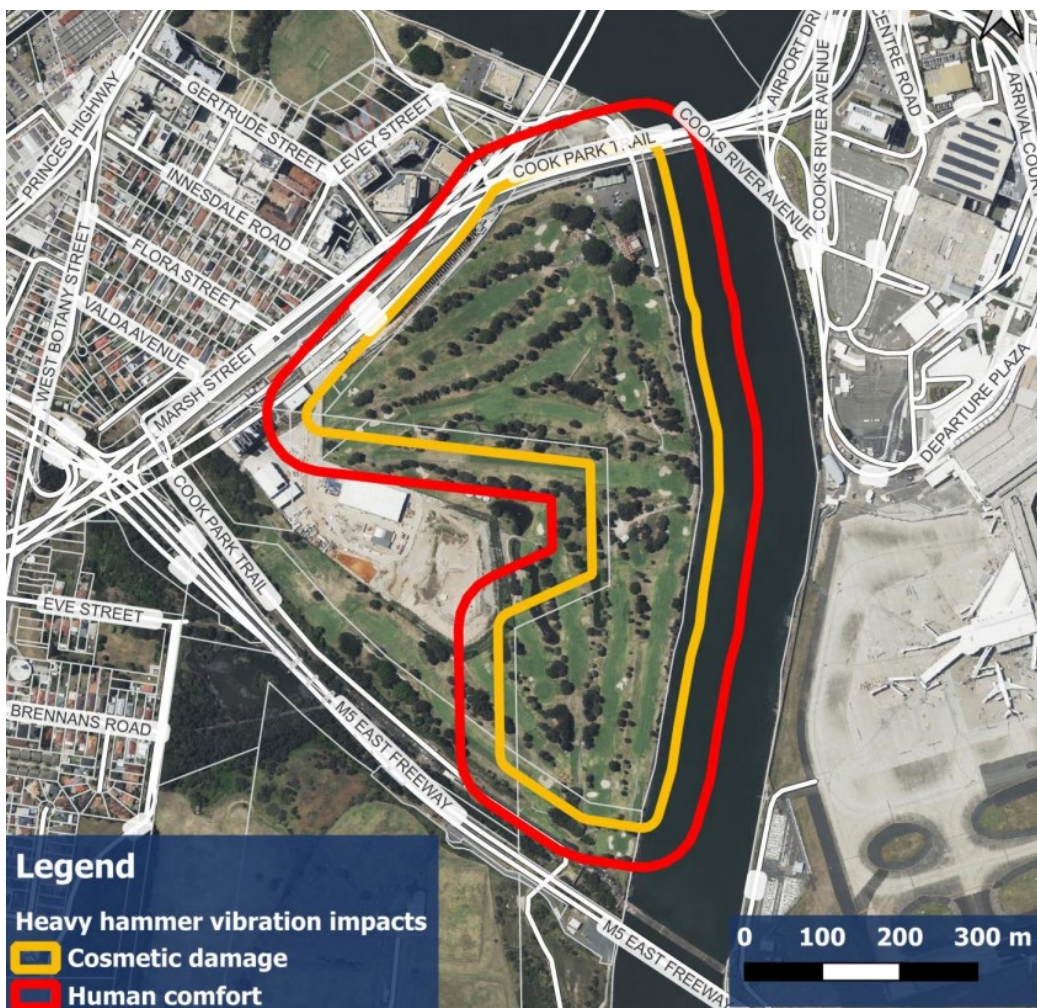


Figure 60 Vibration Impacts

Source: Pulse White Noise Acoustics

6.7.4 Operation

A noise assessment of the operational activities of the Proposal was undertaken in accordance with the NPfI, assuming no additional mitigation measures were implemented beyond the optimisation of the development layout to ensure noise emissions to surrounding residential receivers was minimised. Operational noise modelling was based on all vehicles required to travel in the entrance and up the ramps to the warehouse, breakout noise from warehouses and forklifts

required for each truck entering each warehouse. Operational noise modelling for the proposed data centre is based on chiller, cooling tower and generators.

The assessment is made in relation to PSNTLs which apply at different periods of the day with these periods, comprising:

- **Shoulder:** 5am to 7am;
- **Daytime:** 7am to 6pm;
- **Evening:** 6pm to 10pm; and
- **Night-time:** 10pm to 7am.

The results of the noise assessment were analysed to provide recommendations for further mitigation measures to ensure compliance. In particular, interim acoustic barriers were selected to be located along portions of the Site where high noise generating activities were expected to occur. This will mitigate operational noise to residential receivers immediately surrounding the Site.

The results of each of the assessment each of the Indicative Reference Schemes supporting the proposed Concept Masterplan are identified in the following subsections.

Reference Scheme 1 – Logistics

In the absence of mitigation measures, Reference Scheme 1 will result in exceedances to applicable PSNTLs. However, as demonstrated in **Table 34**, the implementation of mitigation measures will result in the scheme's compliance during all periods.

Table 34 Noise Impact Assessment – Reference Scheme 1

Period	No mitigation			Mitigation		
	Highest Noise Level	Greatest Exceedance	Number of Exceedances	Highest Noise Level	Greatest Exceedance	Number of Exceedances
Shoulder	61 dBA	3 dB	14	47 dBA	0 dB	0
Daytime	62 dBA	3 dB	15	48 dBA	0 dB	0
Evening	61 dBA	12 dB	39	47 dBA	0 dB	0
Night-time	52 dBA	9 dB	23	38 dBA	0 dB	0
Sleep disturbance	74 dBA	13 dB	56	63 dBA	0 dB	0

Source: Pulse White Noise Acoustics

The primary mitigation measures recommended for Reference Scheme 1 are illustrated in **Figure 61** and include:

- Northern ramps from ground floor to the top floor are to be enclosed, with the top floor to include a 4.5 m noise barrier on the ramp to achieve the sleep disturbance noise criteria;
- Southern ramps from ground floor to the top floor are to be enclosed, with the top floor to include a 1m noise barrier on the ramp; and
- A 6m noise barrier is required on the northern internal access road, adjacent to Marsh Street.

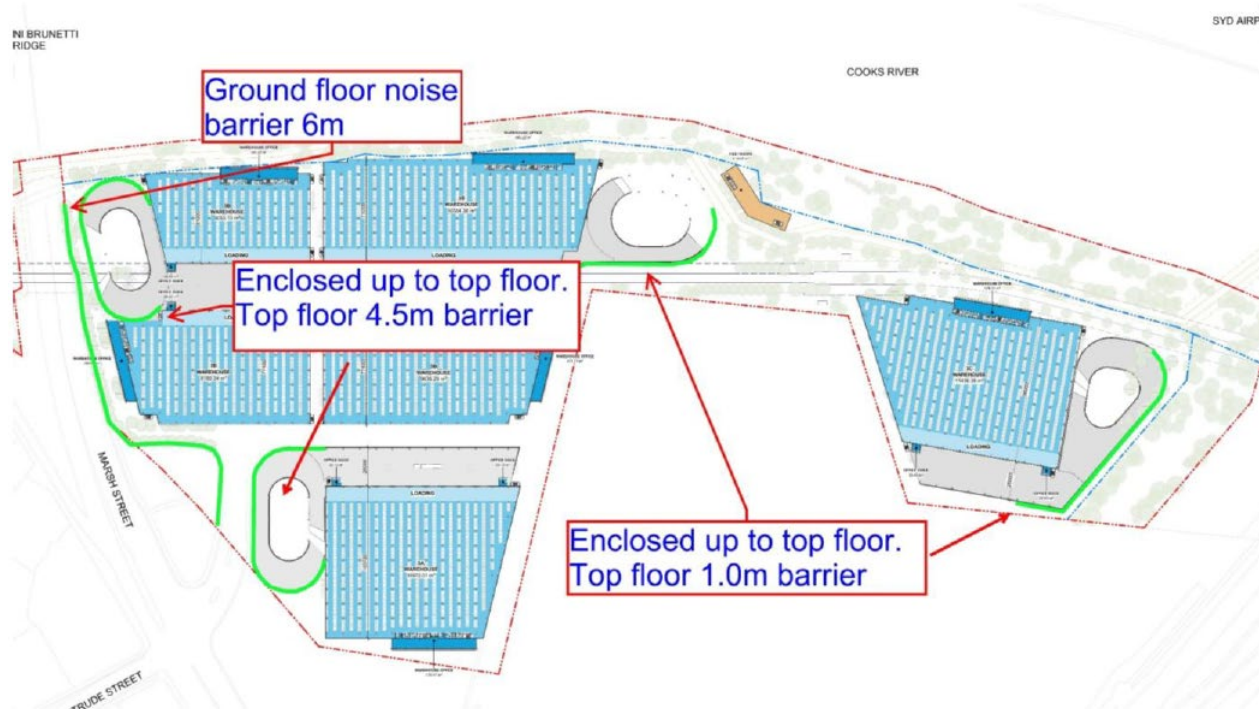


Figure 61 Reference Scheme 1 – Recommended Mitigation Measures

Source: Pulse White Noise Acoustics

Reference Scheme 2 – Logistics + Mixed-use

In the absence of mitigation measures, Reference Scheme 2 will result in exceedances to applicable PSNTLs. However, as demonstrated in **Table 35**, the implementation of mitigation measures will result in the scheme's compliance during all periods.

Given that the proposed land use of Reference Scheme 2 includes the delivery of a hotel and office space, the noise impacts of adjacent warehousing and internal road network on the hotel and office space has been assessed. It has been determined that standard glazing will be sufficient to mitigate the impacts of the Proposal on ongoing use of the proposed hotel and office uses.

Table 35 Noise Impact Assessment – Reference Scheme 2

Period	No mitigation			Mitigation		
	Highest Noise Level	Greatest Exceedance	Number of Exceedances	Highest Noise Level	Greatest Exceedance	Number of Exceedances
Shoulder	61 dBA	4 dB	9	51 dBA	0 dB	0
Daytime	62 dBA	2 dB	16	52 dBA	0 dB	0
Evening	58 dBA	8 dB	27	48 dBA	0 dB	0
Night-time	50 dBA	5 dB	18	40 dBA	0 dB	0
Sleep disturbance	74 dBA	14 dB	56	61 dBA	0 dB	0

Source: Pulse White Noise Acoustics

The primary mitigation measures recommended for Reference Scheme 2 are illustrated in **Figure 62** and include:

- Northern ramps from ground floor to the top floor are to be enclosed, with the top floor to include a 4.5m noise barrier on the ramp to achieve the sleep disturbance noise criteria;
- Southern ramps from ground floor to the top floor are to be enclosed, with the top floor to include a 1m noise barrier on the ramp; and
- A 6m noise barrier is required on the northern internal access road.

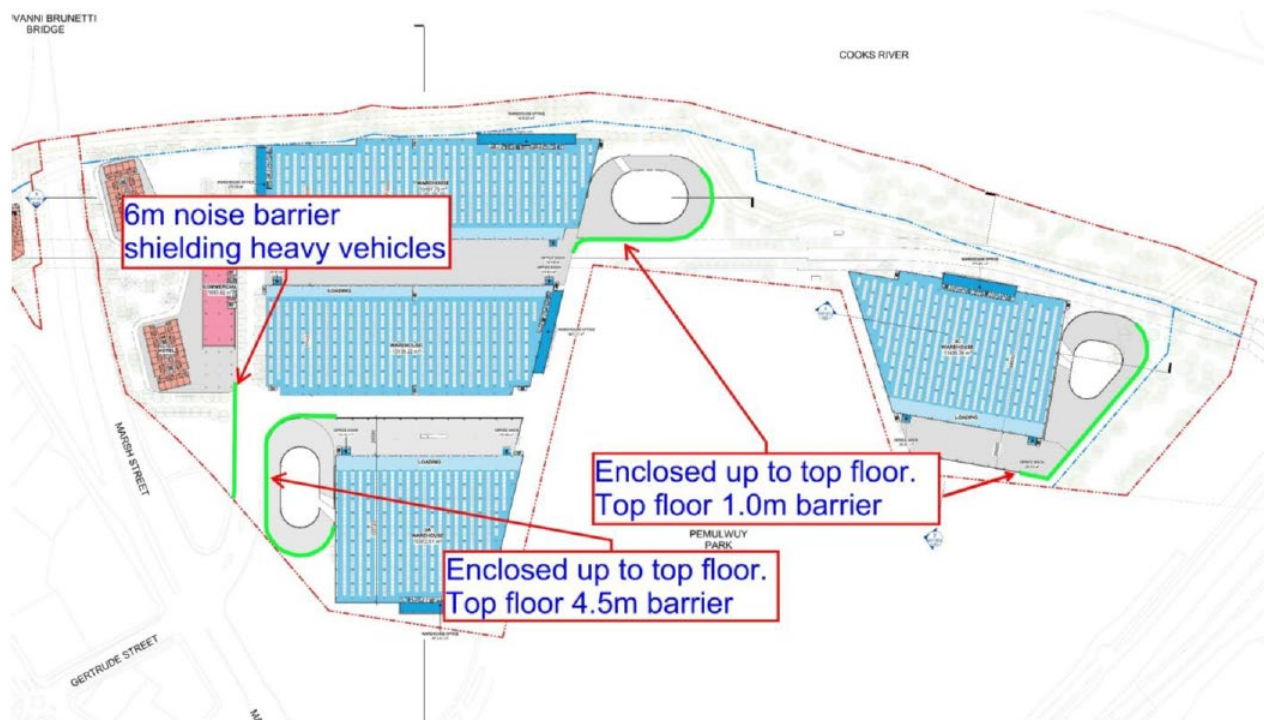


Figure 62 Reference Scheme 2 – Recommended Mitigation Measures

Source: Pulse White Noise Acoustics

Reference Scheme 3 – Logistics + Data Centre

In the absence of mitigation measures, Reference Scheme 3 will result in exceedances to applicable PSNTLs. However, as demonstrated in **Table 36**, the implementation of mitigation measures will result in the scheme's compliance during all periods.

Table 36 Noise Impact Assessment – Reference Scheme 3

Period	No mitigation			Mitigation		
	Highest Noise Level	Greatest Exceedance	Number of Exceedances	Highest Noise Level	Greatest Exceedance	Number of Exceedances
Shoulder	61 dBA	4 dB	15	48 dBA	0 dB	0
Daytime	62 dBA	4 dB	20	50 dBA	0 dB	0
Evening	58 dBA	10 dB	27	45 dBA	0 dB	0
Night-time	50 dBA	7 dB	25	37 dBA	0 dB	0
Generator Testing	76 dBA	14 dB	55	66 dBA	0 dB	0
Sleep disturbance	61 dBA	4 dB	15	48 dBA	0 dB	0

Source: Pulse White Noise Acoustics

The primary mitigation measures recommended for Reference Scheme 3 are illustrated in **Figure 63** and include:

- Northern ramps from ground floor to the top floor are to be enclosed, with the top floor to include a 4.5m noise barrier on the ramp to achieve the sleep disturbance noise criteria;
- Southern ramps from ground floor to the top floor are to be enclosed, with the top floor to include a 1m noise barrier on the ramp;
- A 6m noise barrier is required on the northern internal access road, adjacent to Marsh Street; and
- A 3m barrier is required above the top of chillers and cooling towers.

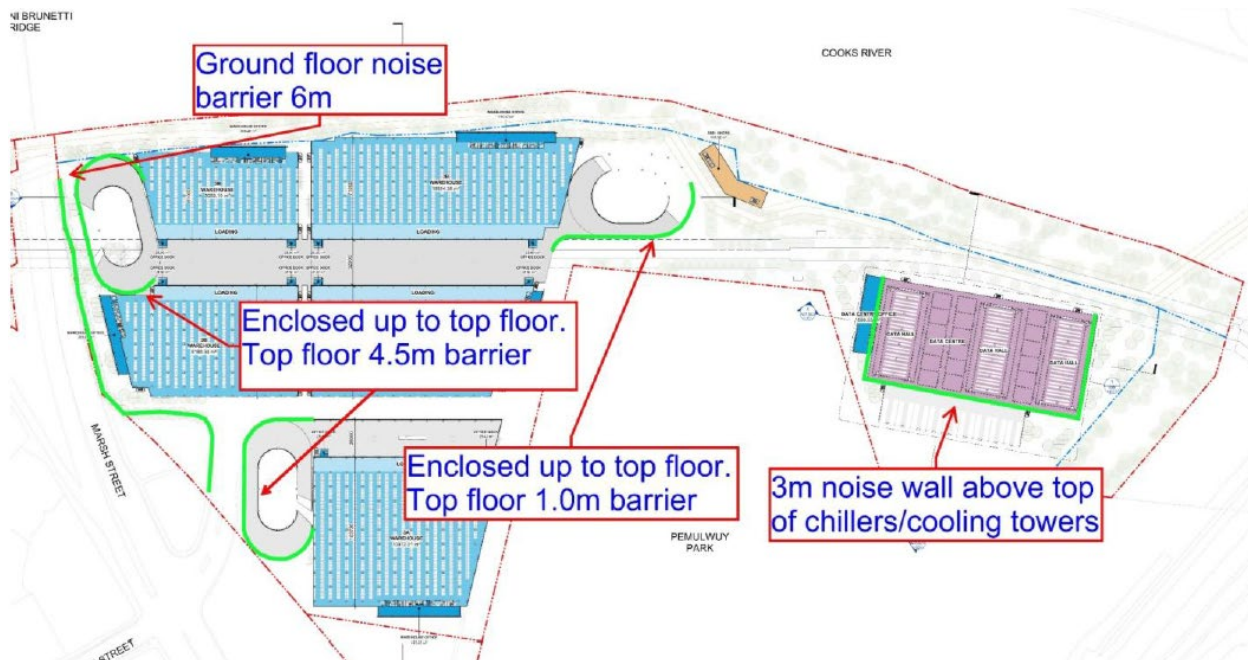


Figure 63 *Reference Scheme 3 – Recommended Mitigation Measures*

Source: Pulse White Noise Acoustics

Reference Scheme 4 – Logistics + Mixed-use + Data Centre

In the absence of mitigation measures, Reference Scheme 4 will result in exceedances to applicable PSNTLs. However, as demonstrated in **Table 37**, the implementation of mitigation measures will result in the scheme’s compliance during all periods.

Given that the proposed land use of Reference Scheme 4 includes the delivery of a hotel and office space, the noise impacts of adjacent warehousing and internal road network on the hotel and office space has been assessed. It has been determined that standard glazing will be sufficient to mitigate the impacts of the Proposal on ongoing use of the proposed hotel and office uses.

Table 37 *Noise Impact Assessment – Reference Scheme 4*

Period	No mitigation			Mitigation		
	Highest Noise Level	Greatest Exceedance	Number of Exceedances	Highest Noise Level	Greatest Exceedance	Number of Exceedances
Shoulder	58 dBA	0 dB	0	48 dBA	0 dB	0
Daytime	62 dBA	5 dB	18	50 dBA	0 dB	0
Evening	61 dBA	11 dB	41	45 dBA	0 dB	0
Night-time	51 dBA	7 dB	27	37 dBA	0 dB	0
Generator Testing	74 dBA	14 dB	55	66 dBA	0 dB	0
Sleep disturbance	58 dBA	0 dB	0	48 dBA	0 dB	0

Source: Pulse White Noise Acoustics

The primary mitigation measures recommended for Reference Scheme 4 are illustrated in **Figure 64** and include:

- Northern ramps from ground floor to the top floor are to be enclosed, with the top floor to include a 4.5 m noise barrier on the ramp to achieve the sleep disturbance noise criteria;
- Southern ramps from ground floor to the top floor are to be enclosed, with the top floor to include a 1 m noise barrier on the ramp;
- A 6 m noise barrier is required on the northern internal access road; and
- A 3 m barrier is required above the top of chillers and cooling towers.

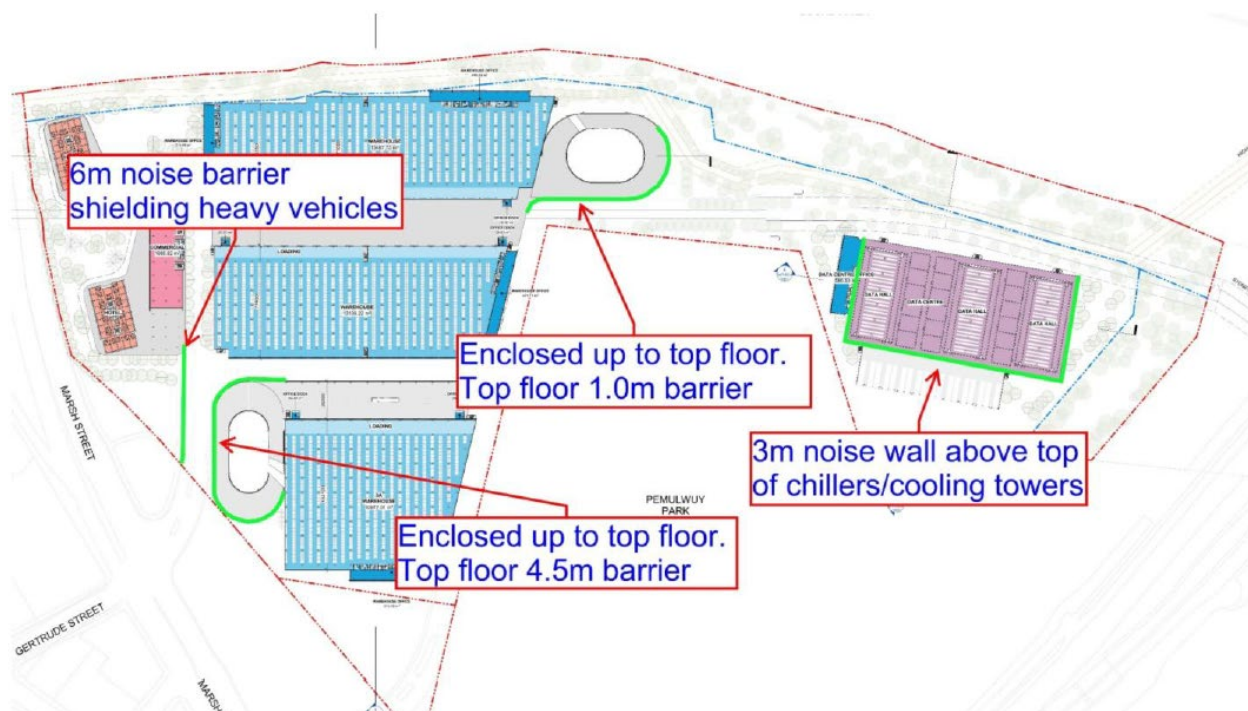


Figure 64 Reference Scheme 4 – Recommended Mitigation Measures

Source: Pulse White Noise Acoustics

Conclusion

In conclusion, the NVIA (**Appendix W**) demonstrates that compliance with the PSNTLs can be suitably achieved for each Indicative Reference Scheme, subject to the implementation of noise mitigation measures. As outlined in **Section 6.7.5**, future Detailed DAs for buildings must demonstrate the incorporation of mitigation measures (if required) to achieve an acceptable noise impact, with consideration for the cumulative impact noise impact of the Concept Masterplan.

6.7.5 Mitigation Measures

The proposed mitigation measures for noise and vibration are outlined in **Table 38** below.

Table 38 Mitigation Measures – Noise and Vibration

Potential Impact	Mitigation Measure
Construction noise	- Implement community consultation measures to inform surrounding members of the public about potential noise impacts. - Site inductions for employees, contractors and subcontractors including behavioural practices. - Scheduling of noise intensive periods and respite periods. - Utilise alternative equipment or processes which generate less vibration and construction noise where possible. - Plan traffic flow, parking and loading/unloading areas to minimise reversing movements within the Site. - Where possible, reduce noise from mobile plant through additional fittings (e.g. silencers).
Construction vibration	- Prior to the use of hydraulic hammers to remove concrete or structural elements separation of the neighbouring building is required to the maintained including removal of debris and saw cutting were required. - Prior to the use of hydraulic hammering within 20m of neighbouring building a saw cut to the perimeter of the ground floor to be excavated is required to be undertaken. Saw cutting of the perimeter of the excavation is required to be undertaken on each level of the excavation. - General construction activities are not expected to exceed project vibration limits detailed in the NVIA.
Operational noise	Future Detailed DAs for buildings must demonstrate the incorporation of mitigation measures (if required) to achieve an acceptable noise impact, with consideration for the cumulative impact noise impact of the Concept Masterplan.

6.8 Air Quality and Odour

An Air Quality Impact Assessment (AQIA) been prepared by RWDI and is included at **Appendix X**. It provides a qualitative assessment of the potential for construction and operational air quality, dust and odour impacts of the Proposal to surrounding sensitive receivers.

6.8.1 Methodology

The AQIA has been prepared generally in accordance with the requirements of the *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (NSW EPA, 2022) guideline, using an approved and appropriate dispersion modelling technique. It considers the existing air quality and meteorological conditions in the region, with the addition of emissions generated from the Proposal during construction and operation to determine if exceedances to the NSW EPA air quality criteria.

Construction Phase

Having regard to the Early Works, the AQIA assesses the impact of the key air quality emissions for the construction stages identified in **Table 39** below.

Table 39 Construction Air Quality Emissions

Construction Stage	Key Air Quality Emissions
Demolition	• Clearing works; • Site establishment works; and • Service works.
Earthworks / Excavation	• Earthworks phase will involve trucks to deliver material, excavators, compactors, dozers and associated equipment; • Dust emissions from bulk earthworks; • Exhaust emissions from diesel power plant, equipment and vehicles; and • Potential odour emissions of contaminants are encountered during earthworks.
Early works	• Minor dust emissions from infrastructure works, construction of internal road to involve trucks to deliver material, excavators, rollers and associated equipment; and • Minor exhaust emissions from diesel power plant, equipment and vehicles.
Track out	• Dust emissions from the movement of heavy vehicles; and • Exhaust emissions from diesel power plant, equipment and vehicles.

Operational Phase

During the operational phase, the increase in vehicle movements due to the Proposal is expected to have the greatest potential impact to air quality. The assessment has therefore been performed to assess the estimated increase in concentration of PM as a result of increases in traffic.

The AQIA assesses both longer term (annual average) and shorter term (24-hour and 1-hour) criteria for Particulate Matter (PM), including

- Total Suspended Particulates (TSPs);
- PMs less than 10 micrometres in aerodynamic diameter (PM₁₀);
- PMs less than 2.5 micrometres in aerodynamic diameter (PM_{2.5}); and
- Nitrogen dioxide (NO₂).

6.8.2 Existing Environment

The closest residential, recreational and commercial receivers surrounding the Site are identified in **Figure 65** below.



Figure 65 Locations of Identified Sensitive Receivers

Source: RWDI

6.8.3 Assessment of Impacts

Construction Phase

In relation to the construction stages from which construction air quality emissions are anticipated to be primarily derived, the dust emission magnitudes are estimated to be as set out as follows:

- **Demolition** – The area affected by the proposed earthworks is greater than 110,000m² and at any one time, greater than 10 heavy earth moving vehicles would be active. It is therefore conservatively assumed that the potential magnitude of earthworks is 'large'.
- **Construction** – The building volume of proposed structures is less than 75,000m³. Therefore, the potential magnitude of construction is 'medium'.
- **Track-out** – track out is expected to result in more than fifty (50) heavy vehicle movements per day leaving the Site, although this would not occur for the entire duration of construction works. All on-site haulage would include unpaved sections of road less than 50m long. The potential magnitude of track out is therefore assessed as 'large'.

Of the sensitive receivers, residential receivers are identified as having a 'high' sensitivity to dust soiling and human health and commercial receivers as having a 'medium' sensitivity. As such, the sensitivity of the surrounding area to the construction works under this Proposal are set out in **Table 40** below.

Table 40 Summary of Surrounding Area Sensitivity

Potential Impact	Sensitivity of the Surrounding Area			
	Demolition	Earthworks	Construction	Track-out
Dust soiling	Low	Low	Low	Low
Human health	Low	Low	Low	Low

Combining the dust emission magnitude and sensitivities of the area, it is determined that the works present the following risk of impacts:

- **Demolition** – Negligible risk
- **Earthworks** – Low risk
- **Construction** – Low risk
- **Track-out** – Low risk

The construction phase of the Proposal will therefore not give rise to unacceptable air quality impacts. Nevertheless, the mitigation measures set out in **Section 6.8.4** should be implemented where possible.

Operational Phase

Additional traffic generated by the Proposal will travel along Marsh Street and eventually enter onto other arterial roads. On this basis, it has been assumed that the road traffic portion of the emissions around the Site are exclusively controlled by the traffic on Marsh Street. The estimated daily traffic volume generated by the Proposal is approximately 1,260 vehicles during peak hour traffic, including various truck sizes. As a result, the estimated increase in pollutants is set out in **Table 41** below.

Table 41 *Estimated Increase in Pollutant Concentration*

Pollutant	Existing Average Concentration	Estimated Concentration Caused by Existing Traffic	Estimated Increase in Concentration Cause by Project Operational Traffic	Percentage Change in Concentration Relative to AQ Criteria	Percentage of Existing Average Concentration Relative to Criteria
PM ₁₀	15.9 µg/m ³	1.9	0.20 µg/m ³	1%	64%
PM _{2.5}	7.6 µg/m ³	0.9	0.09 µg/m ³	1%	84%
NO ₂	17.6 µg/m ³	9.8	1.02 µg/m ³	3%	57%

These estimated increases demonstrate that the impact and significance of the Proposal for each pollutant are as follows:

- **PM₁₀ and PM_{2.5}** – The Proposal presents a ‘negligible’ impact on the sensitive receptors. This will not have any significant effect as it is confined to few receptors and not expected to cause harm to human health.
- **NO₂** – The Proposal presents a ‘negligible’ impact on the sensitive receptors. This will not have any significant effect as it is confined to few receptors and not expected to cause harm to human health.

6.8.4 Mitigation Measures

The proposed mitigation measures for air quality and odour are outlined in **Table 42** below.

Table 42 *Mitigation Measures – Air Quality and Odour*

Potential Impact	Mitigation Measure
Construction air quality	• Prior to commencement of and during construction, the mitigation measures outlined in section 7.1 of the AQIA prepared by RWDI are implemented.
Operational air quality	• Effective preventative maintenance on all plant and equipment concerned with the control of emissions to air be implemented. • Ensuring that spares and consumables are held on Site so that plant breakdowns can be rectified rapidly. • Avoiding unnecessary idling of truck engines on Site. • Ensuring truck maintenance is up to date.

6.9 Hazards and Risk

This section considers the hazards and risk associated with the Proposal, including the potential future storage of dangerous goods and hazardous materials, as well as risk posed by the APA Moomba-Sydney Ethane Pipeline which traverses the Site.

6.9.1 Storage of Dangerous Goods

The Proposal seeks consent for a Concept Masterplan comprising logistics uses within multi-level warehouse buildings that have the potential for future storage of dangerous goods. Noting the Proposal is conceptual only and no future tenants have been secured, the quantities of dangerous goods stored on-site are currently unknown. If a tenant wishes to store dangerous goods on the Site, this would be subject to assessment as part of a separate planning approval process when appropriate.

The Concept Masterplan seeks consent for the *Warehouse or distribution centre* and *Trade-related enterprise* land uses and does not seek consent for the *industries* land use. As such, the quantities of dangerous goods stored and handled within each level of the future multi-level warehouse buildings must not exceed the placard quantities listed in Schedule 11 of the *Work Health and Safety Regulation 2017* (WHS Regulation) at all times.

The proposed storage of dangerous goods and compliance with the WHS Regulation will be considered as part of future Detailed DAs for the multi-level warehouse buildings, as relevant.

6.9.2 Hazard Analysis – APA Moomba-Sydney Ethane Pipeline

A Preliminary Hazard Analysis (PHA) has been prepared by Arriscar and is included at **Appendix Y**. It assesses the risk posed by the APA Moomba-Sydney Ethane Pipeline on the Proposal, determining if any recommendations are necessary.

Methodology

The PHA has been prepared in accordance with the relevant Hazardous Industry Planning Advisory Papers (HIPAPs) which set out acceptable risk criteria established by DPHI. It represents a quantitative risk assessment of the consequences and likelihood of accidents. This includes the identification of hazard events, their consequences assessed against the established impairment criteria and the frequency and likelihood of the hazard. Modelling was undertaken to determine the potential risk of fatality, injury, and societal risk based on the risk criteria established in the relevant HIPAPs.

Existing Environment

The Moomba-Sydney Ethane Pipeline currently intersects the Site (refer to **Figure 11**). It was originally constructed in the 1970s to transport ethane and has since been converted into a natural gas transmission pipeline. The Moomba-Sydney Ethane Pipeline continues to be operated and maintained in accordance with Australian Standards, consistent with APA's transmission pipeline safety and integrity management framework.

Assessment of Impacts

Individual Fatality Risk

The risk contours for individual fatality risk do not exceed 1.0 and 0.5×10^{-6} per annum, which complies with the DPHI risk criteria.

Risk of Acute Toxic Injury or Irritation

No events with the potential to cause acute toxic injury or irritation have been identified and therefore the Proposal will comply with the DPHI risk criteria.

Risk of Property Damage and Accident Propagation

The cumulative risk of over pressure does not exceed 14 kPa, as well as the cumulative risk of heat radiation does not exceed 23 kW/m² and therefore satisfies the property damage and accident propagation criteria.

Injury/Damage Risk Criterion for Explosion Overpressure

The cumulative risk of injury does not reach 50×10^{-6} per annum, complying with the DPHI injury/damage risk criteria.

Injury Risk Criterion for Heat Radiation

The cumulative risk of injury does not reach 50×10^{-6} per annum and therefore complies with the with the DPHI injury risk criterion for heat radiation.

Qualitative Risk Criteria

The Proposal is considered to comply with the qualitative risk criteria for the following reasons:

- It avoids all avoidable risk as the pipeline is in an existing facility which cannot be relocated to avoid risk exposure;
- There are no further ways in which the effects of hazardous release from the pipeline can be contained; and
- The risk levels with the site as a result of the pipeline are below the criteria for commercial development, sporting complexes and active open space and industrial development, with components subject to residential or sensitive uses are located in areas where the criteria can be met.

Societal Risk

The PHA identifies a noticeable increase in the potential societal risk prior to redevelopment of the Site, with the risk criteria extending in to the 'As Low As Reasonably Practicable' (ALARP) region. The post-redevelopment societal risk remains within the ALARP region and remains below the upper limit of the risk tolerability band.

It is noted that the risks would be considered tolerable in the ALARP region, provided other quantitative and qualitative criteria of HIPAP No.4 are met.

Conclusion

In conclusion, the risk assessment determines the following:

- No sensitive land uses such as hospitals, schools, or aged housing are proposed within high-risk zones;
- The level of risk at the proposed hotel location satisfies the DPHI criteria for residential use;
- The individual risk of fatality is consistent with DPHI criteria; and
- The societal risk is within the ALARP region, below the upper limit of the risk tolerability band, and therefore considered tolerable.

Further, the Proposal complies with the qualitative risk principles established in HIPAP No. 4 'Risk Criteria for Land Use Safety Planning' by avoiding all avoidable risks where practicable, reducing risk from major hazards through design refinements, containing consequences within site boundaries where possible, and ensuring that further development does not significantly increase existing risk.

The risk levels within the development area from the ethane pipeline are below the criteria for commercial development, sporting complexes and active open space, and industrial development. Hence, the office, retail and logistics components of the development are unrestricted by the HIPAP No.4 criteria. Components of the development subject to criteria for residential or sensitive use have been located in areas where the criteria are satisfied.

Although the land uses proposed satisfy the DPHI criteria for land use safety planning, mitigation measures are proposed to reduce risk so far as is reasonably practicable (refer to **Section 6.9.3** below).

6.9.3 Mitigation Measures

The proposed mitigation measures for Hazard and Risk are outlined in **Table 43** below.

Table 43 Mitigation Measures – Hazards and Risk

Potential Impact	Mitigation Measure
Storage of dangerous goods	• Future Detailed DAs for multi-level warehouse buildings must consider the quantities of dangerous goods stored and handled within each level against the placard quantities listed in Schedule 11 of the <i>Work Health and Safety Regulation 2017</i> (WHS Regulation).
Release and ignition of ethane from pipeline	• Future Detailed DAs for the construction of buildings must consider the hazards arising from the Moomba-Sydney Ethane Pipeline. It must ensure in the event of a release and ignition of ethane from the ethane pipeline, there is adequate means of egress from the building to a place of safety, or alternatively, there is a suitable place of refuge within the building that remains tenable until the release is isolated.

-
- Emergency response plans associated with future Detailed DAs for buildings must consider the potential hazards arising from the Moomba-Sydney Ethane Pipeline. It must include a high-pressure gas transmission pipeline as a credible scenario, assessing potential consequences, existing safeguards and ensuring emergency response plans and separation distances are within the ALARP limits.
-

6.10 Regulatory Compliance

This section considers the ability for the Concept Masterplan and supporting Indicative Reference Schemes to comply with the relevant regulatory compliance requirements.

6.10.1 Fire Safety

A Fire Safety Concept Strategy has been prepared by Core Engineering and is included at **Appendix Z**. It outlines the conceptual fire safety strategy and assesses the ability for the Concept Masterplan and supporting Indicative Reference Schemes to comply with the Building Code of Australia (BCA) and Fire and Rescue NSW Fire Safety Guideline '*Access for fire brigade vehicles and firefighters*'.

Due to the complexity of the future building, the conceptual strategy outlines that a fully prescriptive approach of complying with the National Construction Code (NCC) Deemed-to-Satisfy Provisions for occupant egress, fire resisting construction, fire services, and fire brigade intervention would not satisfy the desired architectural, operational and client aspirations.

The Fire Safety Concept Strategy (**Appendix Z**) is considered capable of meeting the Performance Requirements of the NCC, subject to validation and verification of any assumptions made through detailed fire engineering analysis. In particular, the provision of perimeter vehicular access has been a key consideration as part of the proposed Concept Masterplan, with further discussion below.

Perimeter Vehicular Access

Perimeter vehicular access paths are required to be all-weather surfaces with load-bearing capacities, ramp gradients and swept paths designed in accordance with Fire Rescue NSW's (FRNSW) '*Access for Emergency Vehicles and Emergency Service Personnel*' guidelines. It specifies that paths must be at least 6m wide and located within 18m of the building on all sides, providing continuous travel in a forward direction around the building.

The proposed Concept Masterplan and supporting Indicative Reference Schemes adopt minimum setbacks to support perimeter vehicle access and include adoption of Performance Solutions to present a holistic solution for brigade access around the various buildings on the Site (refer to **Figure 66**). This includes areas where the path exceeds 18m, portions where the path is beneath the building footprint, and where pinch-points may be located along the path.

Notably, the proposed Concept Masterplan and supporting Indicative Reference Schemes seek to enable the Cooks River foreshore to be utilised for fire brigade perimeter vehicular access in emergencies. As depicted in **Figure 67** on the following page, the indicative concept access along the foreshore includes:

- A 6m wide shared egress pathway, comprising a 4m shared path and 1m cobble surface on either side;
- Minimum clearance of 4.5m, clear of all tree canopy;
- Maximum offset from building facade to outer edge of fire egress path of 18m;
- Maximum of 1:8 gradient between fire egress path and building façade; and
- Regular access paths to building façades with fire boosters collocated with building entry points.

The egress pathway will have sufficient width, swept paths and loadbearing capacity to support the specialist brigade appliances to appropriately stage, as per FRNSW's Guideline Clause 7 "Vehicle access requirements" and 9 "Weight and loads" noting that a minimum 7.5m turning circle radius is required per Clause 7.1.5 of guideline.

Further, as a redundancy to further facilitate brigade intervention for the future development, shared hardstands shall be designed to be accessible by FRNSW specialist appliances. As such, vehicular ramps will be loadbearing for specialist appliances and accommodate their turning circles, have a gradient not greater than 1:8, and afford a minimum 4.5m height clearance.

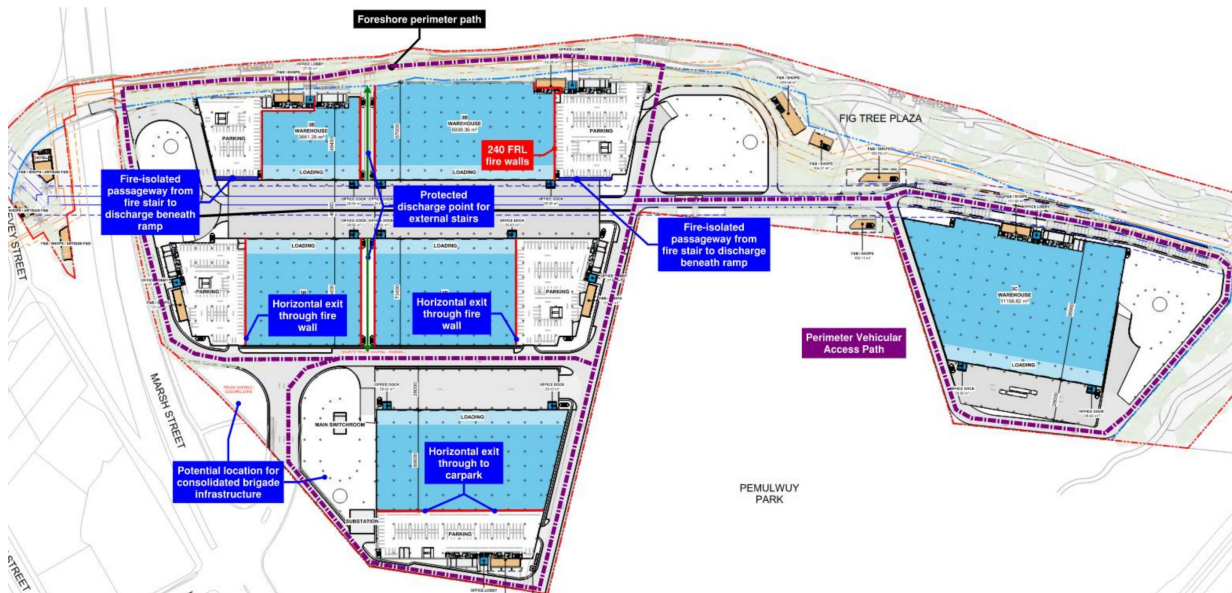
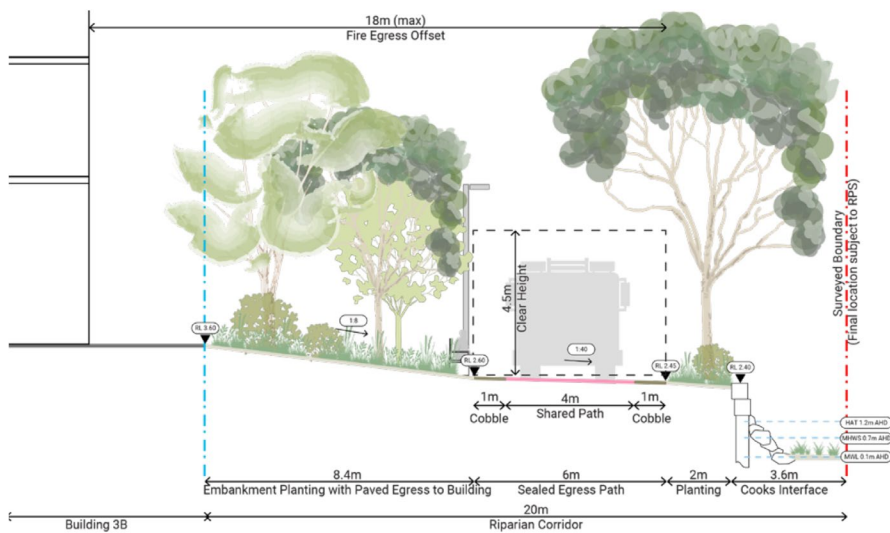
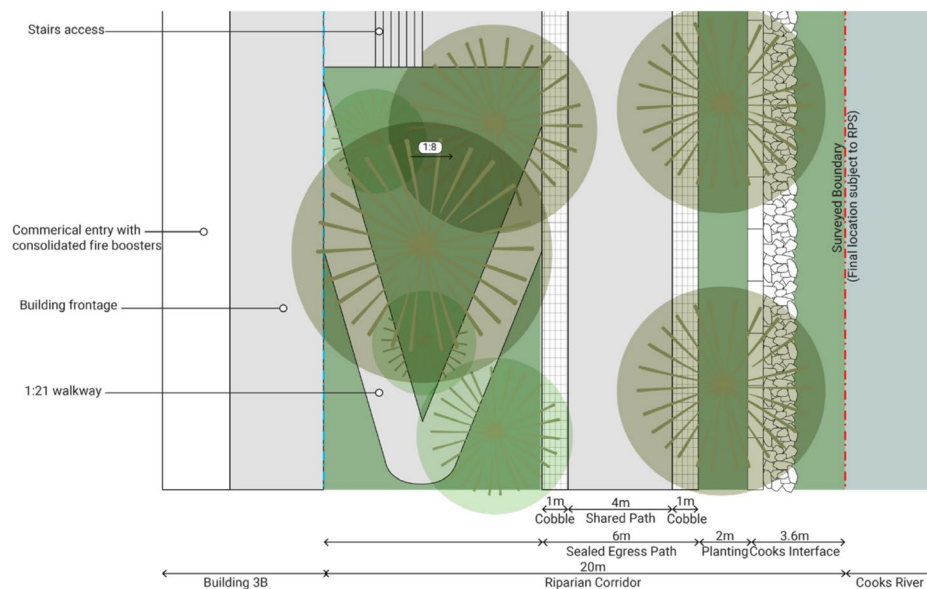


Figure 66 *Indicative Perimeter Fire Access (Ground Level) – Logistics Scheme*

Source: Core Engineering



Section



Typical Plan

Figure 67 *Perimeter Fire Access – Cooks River Foreshore*

Source: Moir Studio

Conclusion

The Fire Safety Concept Strategy (**Appendix Z**) is considered capable of meeting the Performance Requirements of the NCC, subject to validation and verification of any assumptions made through detailed fire engineering analysis.

Through ongoing design development, the conceptual fire safety strategy will be amended and adapted based on consultation with the design team to develop the scope for the Performance Based Design Brief. Specifically, it will be adapted to support future Detailed DAs for the multi-level warehouse buildings and ultimately inform the Fire Engineering Report for construction.

6.10.2 Building Code of Australia

A Building Code of Australia (BCA) Assessment Report has been prepared by BM+G and is included at **Appendix AA**. It confirms that the proposed development is capable of achieving compliance with the BCA Australia. A detailed assessment of building compliance will be provided within future building DAs for each development.

6.10.3 Mitigation Measures

The proposed mitigation measures for Regulatory Compliance are outlined in **Table 44** below.

Table 44 *Mitigation Measures – Regulatory Compliance*

Potential Impact	Mitigation Measure
Fire safety	Future Detailed DAs for the construction of multi-level warehouse buildings are to be supported by a fire safety strategy that demonstrates the development is capable of meeting the Performance Requirements of the NCC.

6.11 Ecologically Sustainable Development

A Sustainability Report has been prepared by Cundall and is included at **Appendix BB**. It discusses the incorporation of Ecologically Sustainable Development (ESD) principles into the Concept Masterplan and supporting Indicative Reference Schemes, including strategies and commitments.

6.11.1 Sustainability Strategy

Stockland has a portfolio-wide Environmental, Social, and Governance (ESG) strategy based focused on decarbonisation, circularity, resilience and social impact (refer to **Figure 68**). The key initiatives include a commitment to net-zero emissions, scaling onsite renewable energy generation, reducing waste through circular economy principles. It is also critical for development to be resilient to climate change through detailed consideration of the site-specific risks as well as fostering more resilient communities and eco-systems.

The Kogarah Golf Club Redevelopment recognises the global logistics market is intrinsically connected to the transport industry and the vast supply chain network of e-commerce and manufacturing businesses. It seeks to respond to demand for de-carbonisation, where the investing landscape is rapidly evolving through mandatory climate-related financial disclosures and expansion of green finance in the form of sustainability linked loans or bonds with preferential terms or interest rates.

The Proposal seeks to deliver state-of-the-art facilities that will redefine the logistics landscape in Australia, setting new benchmarks for scale, efficiency, sustainability and innovation. It includes a minimum 5-star Green Star target, consistent with Stockland's broader portfolio strategy, and will meet the relevant minimum NABERS standards required under the Sustainable Buildings SEPP.

Specifically, the future development is expected to include the following key attributes as a component of the strategy to minimise greenhouse gas emissions in accordance with the Government's goal of net zero emissions by 2050:

- Primarily all-electric buildings, with a limitation on on-site fossil fuels usage;
- Maximised roof top solar PV provision;
- The ability to include a battery system to enable additional day time load to be stored in the system for usage overnight; and

- Reduction in embodied carbon, with consideration of lower carbon concrete and efficient steel design.

The sustainability strategy also includes consideration for a number of other matters, including climate action, circular economy, biodiversity and nature, and resilience.

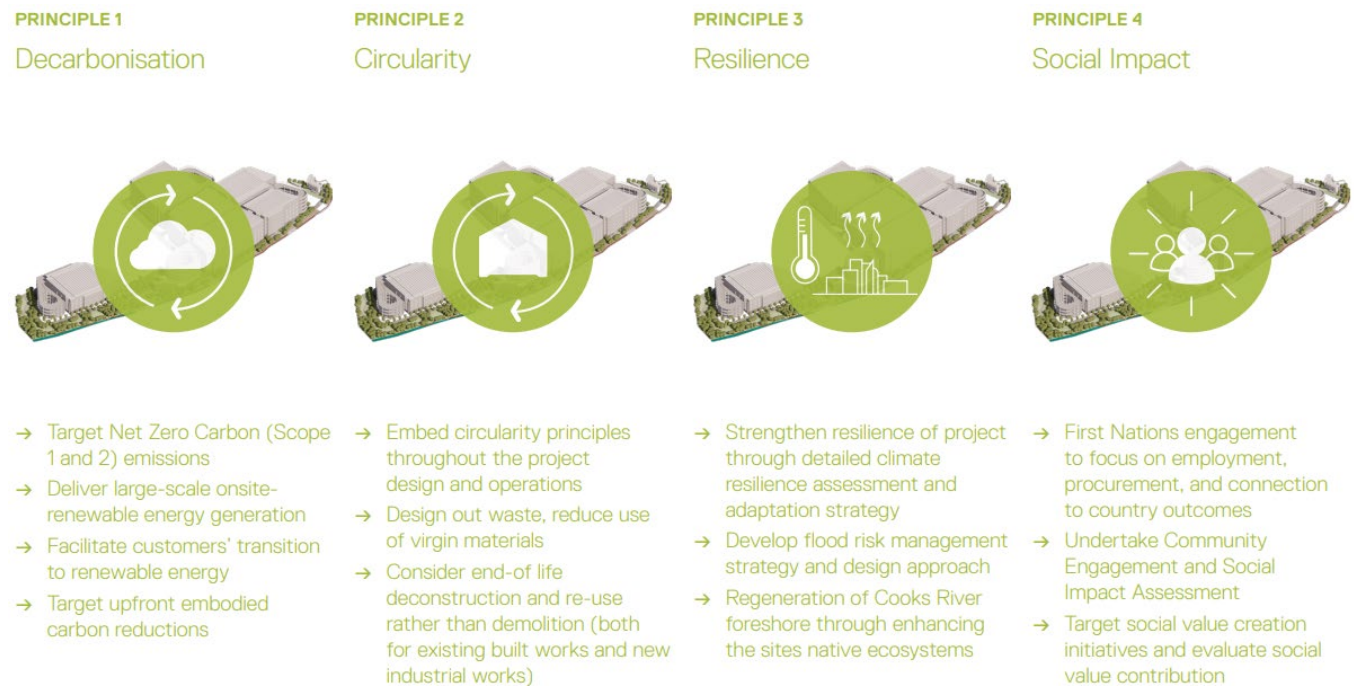


Figure 68 ESG Strategy

Source: Grimshaw

6.11.2 Principles of Ecologically Sustainable Development

The Proposal considers the ESD principles defined under Section 193 of the EP&A Regulation. The sustainability strategy and initiatives used to embody these principles are summarised in **Table 45** below.

Table 45 EP&A Regulation – Principles and Initiatives

EP&A Regulation Principle	Initiatives Incorporated or Considered
Precautionary principle	• The project will explore all feasible opportunities to reduce climate change impacts from construction and operation activities, including energy efficiency, on-site renewable energy technologies, and embodied carbon. • The project will strive to implement climate adaptation principles to increase the resilience of the development to risks caused by projected changes in climate.
Inter-generational equity	• The occupiable portions of the development will provide healthy internal and external environments for workers and visitors wherever possible. Specifically, due consideration to the sustainability of the environment by implementing project wide nature benefits will support future generations. • There will be emphasis placed on considering energy efficiency, environmentally preferable materials, and water conservation. • The master plan includes extensive foreshore enhancements including, tree planting and canopy coverage, foreshore nature corridor connecting to ecology parkland, integrated cycling, e-mobility routes, parking and end of trip facilities.
Conservation of biological diversity and ecological integrity	• Design of landscaping will preference indigenous, low water use, drought resistant plant species wherever feasible. • Landscaping to include ecological parkland and foreshore nature corridor
Improved valuation, pricing and incentive mechanisms responses to environmental problems	• The project will seek to target a sustainability rating to guide environmental goals. • The project sets environmental targets aligned with the Green Star Rating System, aiming to achieve the associated sustainability improvements wherever feasible.

Source: Cundall

6.12 Social

A Social Impact Assessment (SIA) has been prepared by Colliers Urban Planning and is included at **Appendix CC**. It assesses the key social impacts and benefits of the Proposal during construction and future operation.

6.12.1 Methodology

The SIA had been prepared in accordance with the *Social Impact Assessment Guidelines for State Significant Projects* (SIA Guidelines) (NSW DPHI, 2025) and *Technical Supplement* (NSW DPHI, 2025). The SIA Guideline distinguishes social impacts into eight (8) categories, including:

- Way of life;
- Accessibility;
- Health and Wellbeing;
- Decision-Making Systems; and
- Community;
- Livelihoods;
- Culture;
- Surroundings.

The social impact of the Proposal has been assessed based on the magnitude of the potential social impact and the likelihood of the impact occurring based on the pre-mitigated and mitigated scenarios. The social impact assessment considers the Primary (PSL) and Secondary Social Locality (SSL), as identified in **Figure 69** below.

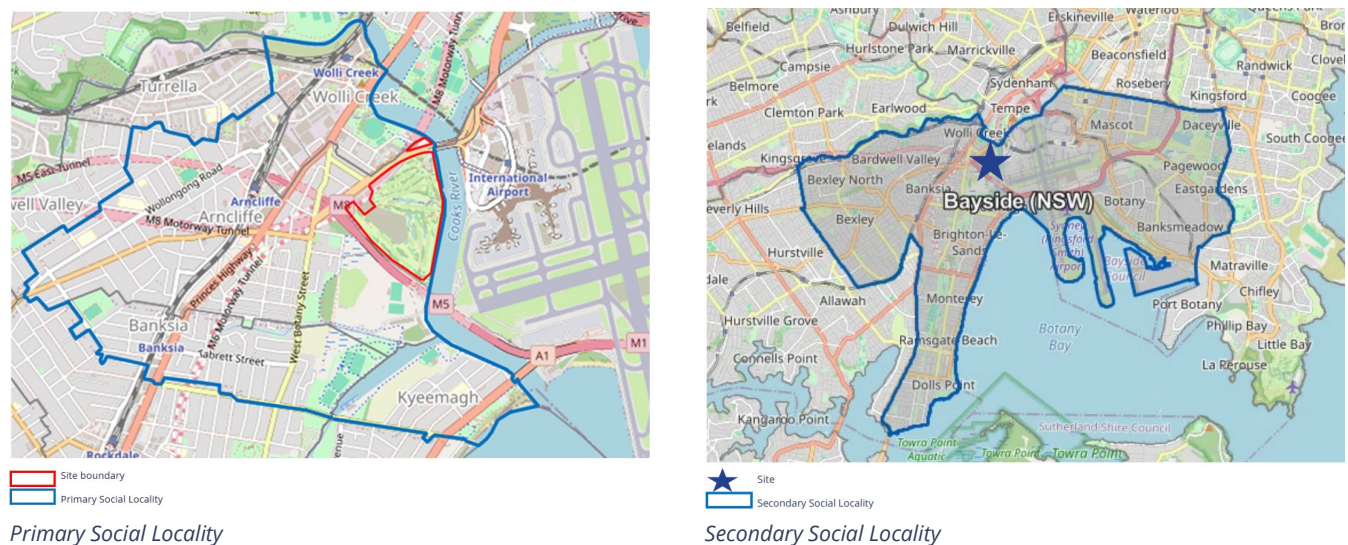


Figure 69 Social Localities

Source: Colliers Urban Planning

6.12.2 Existing Environment

The existing community is characterised as one which is generally culturally and linguistically diverse, never married, well educated, working in professional occupations, more likely to be a couple family with no children and residing in two (2) bedroom units that are privately rented.

The existing community is summarised as follows:

- **Age Profile** – A median age of 37, slightly older than the SSL (35), the same as Greater Sydney (37) and younger than NSW (39). A smaller proportion of children and young people in the PSL (13.8%), compared to the SSL (15.1%). Greater Sydney (18.5%) and NSW (18.2%).
- **Income** – A higher median weekly household income in the PSL (\$2,102) compared to the SSL (\$1,959), Greater Sydney (\$2,077) and NSW (\$1,829).
- **Household Composition** – Most households are family households in the PSL (66.1%), a smaller proportion than in the SSL (68.3%), Greater Sydney 72.6% and NSW (71.2%). The majority of families are couple families with no children in the PSL (48.0%), a greater proportion than in the SSL (39.1%), Greater Sydney (34.8%) and NSW (44.7%).
- **Tenure Type** – A greater number of dwellings being rented privately in the PSL (47.8%) and in the SSL (42.1%) compared to Greater Sydney (32.6%) and NSW (29.4%). Most dwellings are two-bedroom in the PSL (46.8%) and in the SSL (42.1%) compared to Greater Sydney 25.7% and NSW (22.7%)
- **Cultural Diversity** – A smaller proportion of the population who identify as Aboriginal and/or Torres Strait Islander in the PSL (0.8%), the SSL (1.1%), Greater Sydney (1.7%) and NSW (3.4%). A greater proportion of the population who were born overseas in a non-English speaking country in the PSL (62.0%), and in the SSL (53.3%), compared to Greater

Sydney (32.6%) and NSW (30.3%). A greater proportion of the population who speak a language other than English at home in the PSL (66.5%) and in the SSL (57.8%) compared to Greater Sydney (37.4%) and NSW (26.5%).

- **Industry of Employment** – A greater proportion of residents working in professional roles in the PSL (31.8%) compared to the SSL (26.8%), Greater Sydney (29.3%) and NSW (25.8%) A greater proportion of residents working in Computer Systems and Design in the PSL (3.9%) and in the SSL (2.8%) compared to Greater Sydney (3.1%) and NSW (2.3%).

6.12.3 Assessment of Impacts

A summary of the identified social impacts (positive and negative) affected individuals and communities, and associated impact and significance rating is provided in **Table 46** below.

Table 46 *Social Impact Assessment Summary*

Social Impact	Category	Impact Communities	Pre-mitigated social significance rating	Mitigated residual social significance rating
Supporting the development of a contemporary world-class employment and trade-related enterprise precinct in proximity to Sydney Airport and Port Botany.	- Way of Life - Surroundings - Livelihoods	- Sydney Airport and Port Botany - Future employees & service users	Almost Certain, transformational Positive	Almost certain/Major = Very High
Employment generation	- Livelihoods - Health and wellbeing	- Local workers - Local business operators - Suppliers to retail/office premises	Almost Certain, Major Positive	Almost certain/Transformational = Very High
Introduction of new 14-hectare public park for community use – Pemulwuy Park	- Way of Life - Accessibility - Community - Health and Wellbeing - Surroundings	- Local residents - Visitors to the area - Local workers	Almost Certain, Transformational Positive	Almost Certain/Transformational = Very High
Contribution to the Bay to Bay Regional Cycle link	- Way of Life - Health and Wellbeing - Surroundings - Accessibility	- Local residents - Residents from the broader area who use the cycle link. - Visitors to the area	Likely, Major Positive	Likely/Major = High
Create publicly accessible foreshore access	- Way of Life - Health and Wellbeing - Surroundings - Accessibility	- Local residents - Visitors to the area	Almost certain, Major Positive	Almost certain, Major = High
Changes to local amenity during construction and operation due to increases in noise, vibration, visual, and dust impacts	- Way of Life - Health and Wellbeing - Surroundings	- Immediate residential neighbours - Frequent users of local road - Local recreation users	Likely, Moderate Negative	Likely/moderate = High
Disruptions to local road users and increased congestion	- Way of life - Accessibility	Immediate residential neighbours	Possible, Moderate Negative	Possible/minor= Low

Social Impact	Category	Impact Communities	Pre-mitigated social significance rating	Mitigated residual social significance rating
due to, construction and operational traffic using local roads surrounding the site		Local road users		
Change in visual presentation of the site & view impacts.	- Way of life - Surroundings	- Immediate residential neighbours - Local road users - Users of the Cooks River and local open spaces - Pedestrians	Almost certain, Moderate Negative	Almost certain/Moderate = Medium
Overlooking/privacy impacts	Way of Life	Immediate neighbours	Unlikely, Minor Negative	Unlikely/minor = Low
Impacts on flora and fauna (trees, ponds, wildlife)	Surroundings	- Local residents - Local recreation users	Possible, moderate Negative	Possible/minor = Low

The SIA identifies the Proposal includes significant positive social impacts, while negative social impacts can be managed and mitigated through a range of measures. The mitigation measures to minimise these impacts are detailed as part of the relevant matters under **Section 6.0**, with additional measures outlined in **Section 6.12.4** below.

6.12.4 Mitigation Measures

The proposed mitigation measures for Social are outlined in **Table 47** below.

Table 47 *Mitigation Measures – Social*

Potential Impact	Mitigation Measure
Decreased local amenity during construction	- Develop a Communications Plan (or equivalent) that outlines how immediate neighbours are to be kept informed about works being undertaken on the site and timing of works, and are aware of avenues of communication. - The contact details for the site manager/s and that a communication plan is prepared and applied that outlines how the local community will be notified of activities that may create louder noise levels.
Surrounding residential privacy	The detailed design of the future buildings must consider the potential for overlooking to properties to the north, as part of relevant future Detailed DAs.

6.13 Biodiversity

A Biodiversity Development Assessment Report (BDAR) has been prepared by SLR Consulting and is included at **Appendix DD**. It assesses the biodiversity impacts of the Proposal, considering if impacts have been avoided and minimised, and if there any potential impacts that could be characterised as serious and irreversible. It also identifies if any offset obligations are required to compensate for any unavoidable biodiversity impacts.

6.13.1 Methodology

The BDAR has been prepared in accordance with the BC Act, as well as the *NSW Biodiversity Assessment Method 2020* (BAM) and Biodiversity Offsets Scheme. It also considers the Flora and Fauna Assessment (Cumberland Ecology, 2017) prepared to accompany the previous Planning Proposal (PP-2022-1748), as well as other relevant legislation such as the EPBC Act.

Several ecological studies have been undertaken on the Site and surrounds that have provided some indication of the existing vegetation and other habitats. A detailed vegetation map for the study area was produced by Cumberland Ecology following field surveys in 2021. The detailed mapping was further refined during vegetation mapping surveys between 23-24 July 2025 to capture any potential changes to the vegetation since the 2021 field surveys.

6.13.2 Existing Environment

The existing environment is identified as been highly modified, landscaped, and filled, and no original vegetation remains. It was mostly free of mature wooded vegetation in 1943 besides planted figs surrounding the golf club house. Since 1943, the eastern half of the golf course has been removed, assumedly during construction of Sydney Airport and the associated realignment of the lower reaches of the Cooks River, and fairways have been completely redeveloped to incorporate land to the south. Due to the substantial modification of the study area, it is unlikely that any of the existing wooded vegetation is regrowth of the original vegetation communities that occurred in the area.

The Site is identified as containing approximately 5.55 ha of native vegetation, with the remainder of the Site described as comprising exotic species and grassland, as depicted in **Figure 70** below.



Figure 70 Existing Native Vegetation Extent

Source: SLR Consulting

6.13.3 Assessment of Impacts

Direct Impacts

The largest direct impact of the proposed project is the removal of vegetation and associated habitats within the subject land. Although there are different types of flora and fauna habitat within the subject land such as water bodies and ground litter, the most extensive habitat to be impacted is represented by vegetation.

The Proposal will remove approximately 5.55 ha of planted native trees and shrubs within the subject land, comprising:

- 0.01 ha of PCT 4091 Grey Mangrove-River Mangrove Forest;
- 0.02 ha of PCT 4097 Samphire Saltmarsh; and
- 5.52 ha of planted native vegetation.

Of these, PCT 4097 is considered to conform with the Coastal saltmarsh TEC under the BC Act, however, does not confirm to the listing for the community under the EPBC Act. An assessment of significance of the impacts to this community has

been undertaken. The potential impacts on threatened fauna species that may occur as a result of the removal of this community in relation to its habitat value, is discussed in subsequent sections.

In addition to the removal of native vegetation, the project will include the removal of specific habitat features within the subject land. Specific fauna habitat features that will be removed by the project include:

- Hollow-bearing trees suitable as shelter and breeding habitat for a range of hollow-dependent fauna;
- Blossom-producing trees and shrubs suitable as forage for a range of frugivores, nectarivores and insectivores; and
- Artificial water bodies that offer suitable aquatic habitat for fish, reptiles, amphibians and birds.

The removal of these habitat features also has the potential to directly impact the fauna species utilising the habitats during the clearing process. Although some species, including diurnal species and highly mobile species may relocate during this period, there is potential for fauna to remain within the habitat features, such as hollows and water bodies. Species with a higher potential to be impacted during the clearing process include nocturnal species, less mobile species and species that are hibernating or in torpor during the clearing period. Additionally, species that have smaller home ranges may not be able to relocate into non-clearing areas. There is potential for injury and mortality during the clearing process to individuals that remain within the clearing areas

The BDAR (**Appendix DD**) recommends a series of mitigation measures to mitigate impacts to ecosystems and habitat, which form part of the proposed mitigation measures outlined in **Section 6.13.4**.

Indirect Impacts

The indirect impacts of the Proposal that will be considered include the following:

- Inadvertent impacts on adjacent habitat or vegetation;
- Reduced viability of adjacent habitat due to edge effects;
- Reduced viability of adjacent habitat due to noise, dust or light spill;
- Transport of weeds and pathogens from the site to adjacent vegetation;
- Rubbish dumping; and
- Disturbance to specialist breeding and foraging habitat.

Impacts Summary and Offset Requirements

This section outlines the impact summary for the project which has identified and assessed impacts on TECs and threatened species that are at risk of a Serious and Irreversible Impact (SAIL). In accordance with Clause 6.7 of the *Biodiversity Conservation Regulation 2017* (BC Regulation), an impact is to be regarded as serious and irreversible if it is likely to contribute significantly to the risk of a threatened species or ecological community becoming extinct.

As a result of the ecosystem and species assumed present on the Site, biodiversity credits are required. The ecosystem and species credits required to be paid to offset the impact of the Proposal are outlined in **Table 48** and **Table 49** below.

Table 48 Summary of Impacts Requiring Offset – Ecosystem Credits

Vegetation Zone	PCT# and Name	Condition	Area	Loss in Vegetation Integrity	Credits
Zone 1	4091: Grey Mangrove-River Mangrove	Moderate	0.02	-71.4	1
Zone 2	4097: Samphire Saltmarsh	Degraded	0.01	-83.3	1

Source: SLR Consulting

Table 49 Summary of Impacts Requiring Offset –Species Credits

Scientific Name	Common Name	Area	Credits
<i>Litoria aurea</i>	Green and Golden Bell Frog	0.03	2

Source: SLR Consulting

6.13.4 Mitigation Measures

The proposed mitigation measures for biodiversity are outlined in **Table 50** below.

Table 50 *Mitigation Measures – Biodiversity*

Potential Impact	Mitigation Measure
Impacts to biodiversity values	A Biodiversity Management Plan (BMP) will be prepared and implemented to minimise and mitigate impacts to the biodiversity values found within the subject land and broader study area. A summary of the measures to be implemented under the BMP include, but are not limited to: • Protection of vegetation and threatened species habitat outside of approved disturbance areas; • Protection of fauna and their habitat through vegetation clearing and fauna management protocols; • Protocols to control and manage weeds, pests, and pathogens; • Incidental and unexpected finds protocol; • Rehabilitation and restoration of vegetation and habitat within temporary disturbance areas (i.e. overland flood pathway); • Habitat enhancement within landscaping areas (i.e. foreshore riparian buffer zones, Fig Tree Plaza (north or south)); and • Nest box installation.
Impacts to the Green and Golden Bell Frog population	To manage and minimise the potential impacts specifically to the Green and Golden Bell Frog (GGBF), a GGBF Plan will be prepared. The overall objectives of this Management Plan will be to ensure that the current Arncliffe population of the GGBF is maintained, to minimise threatening processes at the site and to improve habitat and connectivity for the species to enable successful breeding and on-going population viability. The GGBF Management Plan will complement the plan prepared for the major project SSI-6788, and will apply specifically to land owned by the Applicant. Specific management measures that will be undertaken to achieve these objectives include the following: • Manage existing frog populations during construction by erecting frog proof fencing and conducting pre-clearance surveys; • Increase connectivity between sites to encourage breeding; • Maintain newly created breeding ponds; • Improve water quality within existing and new ponds; • Undertake population monitoring and reporting within land owned by Cook Cove Inlet; • Provide for long-term habitat protection and management; and • Address other Key Threatening Processes. This plan will provide general plans for the management of the GGBF and its habitat in the subject land, but a detailed management protocol and contingency plan (referred to here as the GGBF Construction Plan) will also be produced at the during subsequent DA stages to deal with the detailed management of the GGBF Frog prior to and during construction.
Removal or damage to ecosystems and species during Construction	Prior to construction a Construction Environmental Management Plan (CEMP) will be prepared and implemented as part the project's construction. Mitigation measures proposed to be implemented under the CEMP include, but are not limited to: • Traffic control including limiting speeds on internal roads; • Stormwater management; • Weed management; • Fencing and access control; • Bushfire management; • Erosion and sediment control; and • Workforce education and training.

6.14 Aboriginal Cultural Heritage

An Aboriginal Cultural Heritage Assessment Report (ACHAR) has been prepared by Biosis and is included at **Appendix EE**. It provides a detailed investigation and assessment of the potential for Aboriginal cultural heritage present at the Site, including consultation with Aboriginal parties and recommendations which have been adopted as mitigation measures for the Proposal.

6.14.1 Methodology

The Aboriginal community were consulted regarding heritage management as per the process outlined in the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW, 2010). A summary of the consultation undertaken is provided in **Section 5.1.3** and the ACHAR (**Appendix EE**).

The ACHAR was informed by a desktop assessment, including a search of the Aboriginal Heritage Information Management System (AHIMS) database on 14 October 2025. It was also informed by previous archaeological assessments undertaken on the Site and archaeological field surveys undertaken on the Site, focused on areas of impact, high ground surface visibility and remaining traces of landforms that have historically held archaeological potential.

The assessment of the Aboriginal significance of the site has been determined based on the guidance provided by the *Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance* (the Burra Charter), the *Guide to Investigating and Reporting on Aboriginal Heritage* (the Guide) and *Requirements of the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (the Code).

6.14.2 Existing Environment

The existing Aboriginal cultural heritage environment at the Site, as informed by the desktop assessment, is described as:

- Underlain by quaternary sand, peat and mud deposits, which overlies Hawkesbury Sandstone;
- Located adjacent to the Cooks River, which would have provided an abundance of resources to Aboriginal groups in the area, but has undergone extensive disturbance and has been diverted a number of times;
- Located within the Eora or coastal Darug language group and is in the vicinity of three clans including the Wangal, Cadigal and Gameygal; and
- No identified Aboriginal cultural heritage sites located on the Site under the AHIMS, with a total of one-hundred and two (102) Aboriginal archaeological sites within a 6.25 x 6.25 kilometre search radius of the Site.

6.14.3 Assessment of Impacts

Based on the desktop and field studies undertaken, the Site has undergone extensive landscape modification associated with land reclamation, the diversion of Cooks River and various land uses. Biosis therefore determined that any archaeological deposits that may have once been present at the Site, will likely have been impacted or destroyed.

The field investigation did not identify any Aboriginal sites, objects or favourable landforms. It is noted that bleached shell was identified across the Site eroding out of fill where ground surface visibility was high underneath trees, within the walls of sand bunkers, or where grass was otherwise not present. Based on the characteristics, Biosis determine the shell may have originated from either a redeposited shell midden or a natural deposit, such as one formed by fluvial processes.

A number of previous Archaeological assessments have been undertaken within and surrounding the Site which have investigated and confirmed extensive high-level disturbances to the natural soil profile. A previous assessment (AECOM, 2015) determined that underlying deposits were likely also disturbed and that there was therefore no archaeological sensitivity for the area. Further, another previous assessment (Biosis, 2023) also concluded that even if the natural soil deposits are present in situ, they would be located beneath the current groundwater level and have low potential to contain archaeological deposits.

Available borehole data for the Site shows that the current soil profiles within the study area consist of imported fill to a depth of 0.5-1.8m, overlying interbedded sands and clays, which in turn overly sandstone bedrock at a depth of between 9-33m. If any intact archaeological material were to be present within the Site, it would be located within the interbedded clays and sands underlying the fill. The depositional sequences between the boreholes suggests that the interbedded sands and clays across the entire study area were created through extensive filling of a mixture of the Birrong and

Warriewood soil landscapes. The groundwater depth and seepage also indicates the original area would have been low-lying and marshy.

The ACHAR subsequently concludes that the shell material does not represent intact cultural midden deposits and is unlikely to be cultural midden material. Although some of the shell may be representative of redeposited midden material, the shell material identified is from a highly disturbed context and the origins of the soil and shell material are unclear. While this analysis was not supportive of the recovered shell material being cultural in nature, this does not imply that land around the Cooks River did not once contain several complex Aboriginal shell middens.

An assessment of significance has been undertaken based on the Burra Charter, the requirements of the Code, and the Guide to Investigating and Reporting on Aboriginal Heritage. A summary of the statement of significance assessment is provided in **Table 51** below.

Table 51 *Summary of Statement of Significant Assessment*

Criteria	Mitigation Measure	Significance
Cultural	Discussions with the local Aboriginal communities reflect that the Site is high in value.	High
Historical	The Site is not connected to any historical event or personage.	Low
Scientific	The Site possesses no archaeological values.	Low
Aesthetic	The Site is located next to Cooks River and while it has been impacted by modern development, consultation has indicated it still has some aesthetic significance.	Moderate

In conclusion, the majority (if not all) of the evidence of past Aboriginal occupation/ Aboriginal history on the Site has since been removed, heavily disturbed or buried under deep landfill. Due to the high disturbance prevalent throughout the recent history of the Site and geotechnical works identifying the presence of fill at depths up to 1.8m across the Site, it has been identified as containing low potential for Aboriginal sites.

Biosis therefore conclude that no further archaeological works are necessary, with other recommendations incorporated as mitigation measures in **Section 6.14.4** below,

6.14.4 Mitigation Measures

The proposed mitigation measures for Aboriginal cultural heritage are outlined in **Table 52** below.

Table 52 *Mitigation Measures – Aboriginal Cultural Heritage*

Potential Impact	Mitigation Measure
Aboriginal cultural management	Continued consultation with registered Aboriginal parties is to be undertaken to inform the management of Aboriginal cultural heritage sites.
Discovery of unanticipated Aboriginal objects	- Monitoring is to be undertaken by RAPs during excavation past fill layers to ensure that if any Aboriginal archaeological is present, it will be identified and appropriately managed. - If any Aboriginal objects are encountered during works associated with this proposal, works must cease in the vicinity and the find must not be moved until assessed by a qualified archaeologist. If the find is determined to be an Aboriginal object the archaeologist will provide further recommendations. These may include notifying Heritage NSW and Aboriginal stakeholders. - A heritage induction must be included in the site induction for all construction workers. This will inform as to when works must cease and a manager be contacted for further instruction should any potential Aboriginal sites be identified during groundworks. It must be included in the Construction Environmental Management Plan (CEMP) for the project and include the following items: - Relevant legislation. - Location of identified Aboriginal heritage sites, areas of archaeological potential, and areas of archaeological sensitivity. - Basic identification skills for Aboriginal and non-Aboriginal artefacts and human remains. - Procedure to follow in the event of an unexpected heritage item find during construction works. - Procedure to follow in the event of discovery of human remains during construction works. - Penalties and non-compliance.

Discovery of human remains

- If any suspected human remains are discovered during any activity works, all activity in the vicinity must cease immediately. The remains must be left in place and protected from harm or damage. The following immediate actions that must be taken in instances where human remains or suspected human remains are discovered:
 1. **Discovery:** If suspected human remains are discovered all activity in the vicinity must stop to ensure minimal damage is caused to the remains; and the remains must be left in place and protected from harm or damage.
 2. **Notification:** Once suspected human skeletal remains have been found, the Coroner's Office and the NSW Police must be notified immediately. Following this, the find will be reported to the Aboriginal parties and Heritage NSW.
-

6.15 Non-Aboriginal Cultural Heritage

A Historical Archaeological Assessment (HAA) and Statement of Heritage Impact (SoHI) have been prepared by Biosis and included at **Appendix FF** and **GG** respectively. The reports assess the non-Aboriginal archaeological and environmental heritage impact of the Proposal on the Site and surrounding heritage context.

6.15.1 Methodology

The HAA has been prepared in accordance with the heritage guidelines including *Historical Archaeology Code of Practice, Assessing Significance for Historical Archaeological Sites and 'Relics'* and *Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance* (the Burra Charter). The report is based on historical research and field inspections undertaken to identify whether any archaeological heritage items or relics exist within the Site.

The SoHI has been prepared in accordance with the *Guidelines for prepare a statement of heritage impact*. The report is informed by a site inspection completed on the 20 November 2025 which was used to make an assessment of the heritage significance of heritage items in the surrounding area.

6.15.2 Existing Environment

The existing geological character of the Site is defined by quaternary sand, peat and mud deposits which overlie Hawkesbury Sandstone. It consists of disturbed terrain which has soils disturbed to a depth of at least 100cm.

The earliest available information identified by the background research for the HAA indicates that the Site was originally located within the original 110-acre land grant given to Alexander Brodie Spark in 1828. It identifies the Site was cleared and used for livestock grazing and dairying from the 1830s, with associated industries including boiling-down works and tanneries were also conducted in the local area.

The first indications of major land development occur on part of the sewage farm as early as 1882, before it was closed in 1916 and the land was subsequently sold off. Between 1947 and 1956 the river was realigned to the west and south-west. The recent history of the Site is depicted in the historical aerial imagery provided in **Figure 71** below.



1943



1955



1971



1986



2005



2025

Figure 71 *Historical Aerial Imagery (1943-2025)*

Source: NSW Spatial Services, edited by Biosis

The SoHI confirms that there are no identified heritage items located on the Site. However, there are several heritage items located in the vicinity of the Site, including:

- **Alexandra Canal (Item no 01621)** – The Alexandra Canal is an adapted artificial waterway which stretches 4.5km from its southern point at Cooks River to the north at Alexandria;
- **Southern and Western Suburbs Ocean Outfall Sewer (SWOOS) (Item No. I32)** – This sewer main provided a means of sewage removal from the southern suburbs of Sydney, initially terminating at Rockdale Sewage Farm, then connecting to the main western carrier;
- **Western Outfall Main Sewer (SHR 01647)** – This item is an original section of one of Sydney's oldest main sewers built in the 1890s to avoid the discharge of sewage into Sydney Harbour;
- **Commonwealth Water Pumping Station and Sewerage Pumping Station (Item No. I298)** – Includes standalone buildings located in a grassed area adjacent to the old water pumping station; and

- **Ruins of the former Botany Pumping Station (Item no I282)** – Located at the south-western edge of the open space which overlies the aquifer of the Botany Wetland, the waterworks provided the infrastructure to pump the fresh water discharged by this aquifer to reservoirs in Surry Hills and Paddington.

The surrounding heritage items in close proximity to the Site are identified in **Figure 72** below.

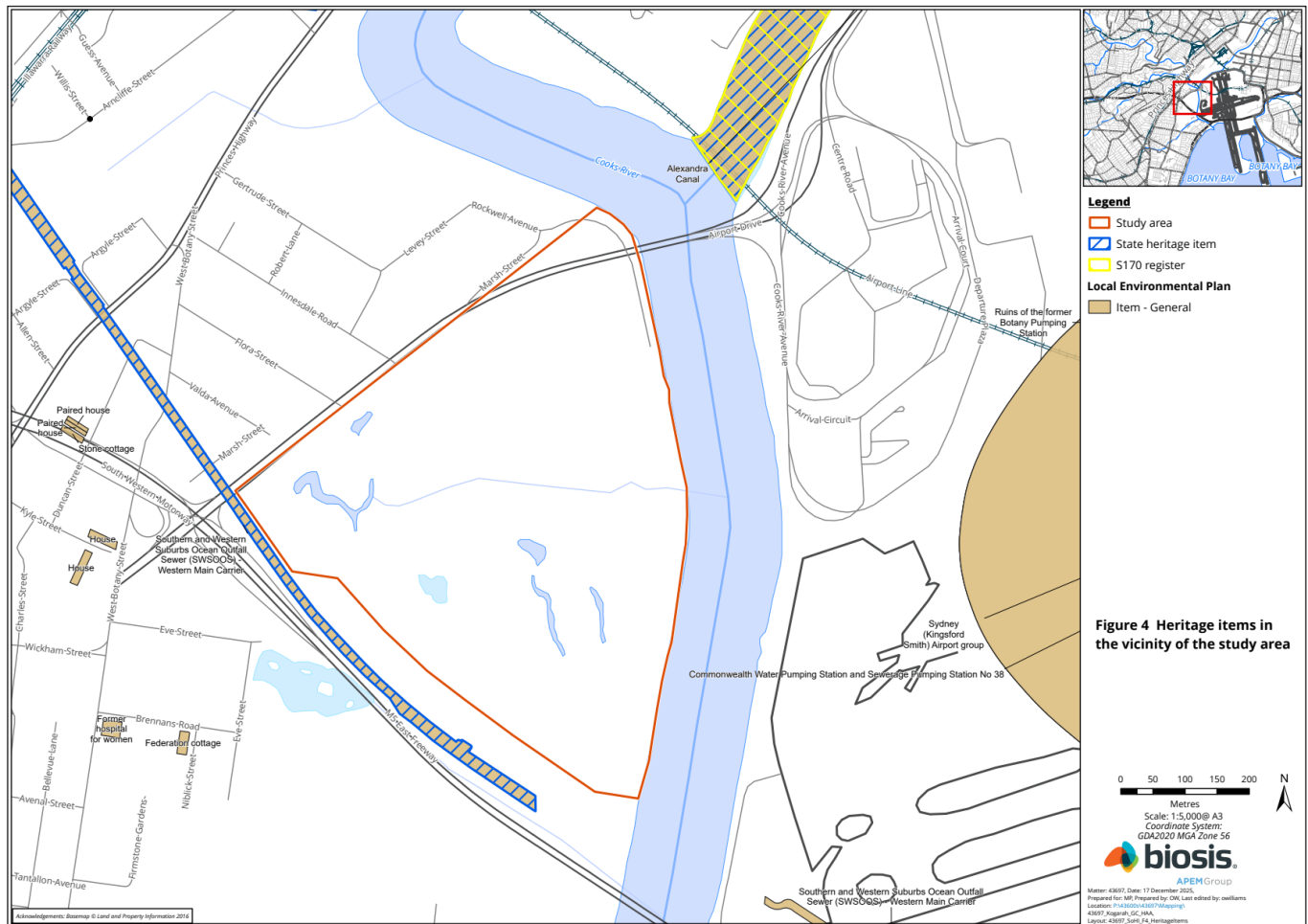


Figure 72 Surrounding Heritage Items

Source: Biosis

6.15.3 Assessment of Impacts

The HAA identifies archaeological resources on the Site that are reflective of its use for commercial purposes throughout its historical tenure, including brick or timber footings or wall foundations, concrete slabs, cut and fill deposits, demolition deposits, and plough lines. Previous development, including varying depths of excavation for landform modifications, major road industry, and the installation of utilities services would have impacted this archaeological resource.

Biosis confirm that none of the potential archaeological resources identified within the Site satisfy the criteria for local or State significance. Based on the background research and physical inspection, the Site is identified as containing low archaeological potential for archaeological resources to exist.

The SoHI provides an assessment of the impact to each of the heritage items located on the vicinity of the Site, concluding the following:

- Increased development along the Cooks River may affect long distance sightlines and reducing the spatial openness when viewed from the Alexandria Canal. However, taking into consideration that views from the Canal are already interrupted and include high-rise development located in the vicinity of the Site, the Proposal is unlikely to adversely impact the heritage value of Alexandria Canal.
- No direct impact to the heritage fabric of the SWOOS is expected, however the Proposal has the potential to change the heritage setting of the item through changes to the curtilage, visual character, contextual legibility and landscaping. The location of Pemulwuy Park provides a level of visual separation for most of the length of the heritage

item. The Proposal is considered unlikely to adversely impact the heritage values of the SWOOS, subject to measures taken to conserve the immediate landscape surrounding the item.

- The Proposal will not impact the heritage value of the Commonwealth Water Pumping Station as it lies outside of the visual catchment and curtilage of the development area.

In conclusion, the potential archaeological resources associated with the Site have been assessed as containing no archaeological significance at a local or State level. Therefore, there are no further works required to investigate historical archaeology within the Site, with a discovery of unexpected finds protocol to be implemented during construction (refer to **Section 6.15.4**).

Further, the Proposal is unlikely to adversely impact the heritage value of any surrounding heritage items. To ensure no heritage impacts occur to the SWOOS, Bosis recommends heritage advice is obtained in relation to the detailed development of Building 3C located immediately adjacent (refer to **Section 6.15.4**).

6.15.4 Mitigation Measures

The proposed mitigation measures for non-Aboriginal cultural heritage are outlined in **Table 53** below.

Table 53 *Mitigation Measures – Non-Aboriginal Cultural Heritage*

Potential Impact	Mitigation Measure
Discovery of unexpected finds	• Relics are historical archaeological resources of local or State significance and are protected in NSW under the <i>Heritage Act 1979</i> (Heritage Act). Unanticipated relics be discovered during the course of the project, the following steps must be taken: - If a find is identified, works must stop immediately around the find and the area must be protected. - The find must be reported to the project manager or supervisor. - A historical archaeologist must be contacted to identify the find. - If the find is a relic, a mitigation strategy must be developed and implemented. This could include avoidance of the find, test excavation or other mitigation measures. - If the find is a relic, notification to Heritage Council under Section 146 of the Heritage Act will be required.
Heritage impacts at future Detailed DAs	• Additional heritage advice must be sought in the preparation of any future Detailed Development Applications for phases of the development that are immediately adjacent to the Southern and Western Suburbs Ocean Outfall Sewer (SWSOOS) to ensure heritage values of the SWSOOS are conserved and no physical impacts to heritage fabric are proposed.

6.16 Water Management

A Civil Engineering Report has been prepared by Costin Roe Consulting and is included at **Appendix HH**. It assesses the conceptual stormwater management plan, in accordance with Bayside Council's technical specifications. It also considers the water balance of the future development and any potential impacts to surface or groundwater.

6.16.1 Methodology

An integrated water cycle management strategy has been developed addressing stormwater quantity, quality, reuse and flooding. The strategy is consistent with Part 10 of the Bayside DCP 2022, the Technical Specification for Stormwater Management (2023) and the Botany Bay & Catchment Water Quality Improvement Plan (2011). It also considers the geotechnical conditions of the Site, identified in the Geotechnical Investigation (**Appendix JJ**).

6.16.2 Existing Environment

The Site is currently a former golf course with no or limited existing formal in-ground drainage other than existing carpark areas, which would carry stormwater runoff to the Cooks River. It currently conveys overland flow from Marsh Street through low-lying areas to the Cooks River. The Site's runoff is characterised by gradual sheet flow and shallow surface drainage typical of vegetated open space within a floodplain setting.

6.16.3 Assessment of Impacts

Stormwater Management

A conceptual stormwater management plan has been prepared and detailed in Appendix B, C and D of the Civil Engineering Report (**Appendix HH**), described as comprising:

- In-ground piped drainage system designed to the 5% Annual Exceedance Probability (AEP) (1 in 20-year flood event);
- Three (3) discharge points to the Cooks River;
- Treatment of stormwater via pit inserts and a proprietary treatment system; and
- Conveyance of overland flow from the site through the hardstand and carparking areas to the Cooks River.

As described in **Section 3.3.2**, the Early Works only includes the construction of the permanent overland flow path through the future public open space, discharging to the Cooks River as the southern end of the Site. The remaining portions of the stormwater management plan will be delivered in stages as part of future Detailed DAs.

As aforementioned, the conceptual stormwater management plan comprises three (3) discharge points to the Cooks River, described as:

- **Discharge Point 1** – Located at the north-east of the Site, discharging through a new ø1200 mm RCP to the Cooks River at IL 0.12 m AHD, with a maximum contributing catchment area of 5.26 ha;
- **Discharge Point 2** – Located at the central eastern boundary, discharging through an upgraded ø1200 mm RCP to the Cooks River at IL -0.51 m AHD, with a maximum contributing catchment area of 6.80 ha; and
- **Discharge Point 3** – Located at the southeast of the site, discharging through an existing ø1500 mm RCP to the Cooks River at IL -0.61 m AHD, with a maximum contributing catchment area of 4.70 ha.

Stormwater Quantity

No stormwater quantity measures, such as On-Site Detention (OSD), are proposed. This is on the basis that the Site's hydraulic behaviour is primarily influenced by tidal fluctuations and regional flood levels rather than by localised site discharges. Under these conditions, the introduction of OSD would not provide a measurable benefit and could, in fact, exacerbate flooding by delaying discharge and synchronising local runoff with regional flood peaks.

Therefore, stormwater from the Site will discharge directly to the Cooks River via the three (3) existing outlet locations, in accordance with the established catchment drainage pattern and independent of Council's drainage network.

Stormwater Quality

The future development under the Concept Masterplan will include extensive impervious areas including runoff from the roof, hardstand, car parking, and roads, and are required to be treated by the Stormwater Treatment Measures (STM's). The STM's will be sized according to the whole catchment area of the development. The STM's for the future development will be based on a treatment train approach to ensure that all the objectives above are met.

The indicative components of the treatment train for the future development are as follows:

- Gross Pollutant Traps (GPTs) as the primary treatment to the parking, roof, and hardstand areas;
- Stormwater quality tanks with Ocean Protect StormFilter cartridges as the tertiary treatment of the development; and
- Rainwater reuse and settlement within rainwater tanks from a portion of the stormwater run-off.

To assess the performance of the concept treatment train, MUSIC modelling has been undertaken to predict if the indicative systems are appropriate for their catchments and capable of meeting specified stormwater quality objectives.

The results of the MUSIC analysis is presented in **Table 54** below, where the reduction rate is expressed as a percentage and compares the post-development pollutant loads without treatment versus post-development loads with treatment based on combined runoff produced from roofs, hardstand and roads throughout the precinct.

Table 54 Stormwater Quality Assessment

Component	Source	Residual Load	Reduction Achieved	Reduction Target
Total Suspended Solids	27,800 kg/yr	4,100 kg/yr	85.2%	>85% (Complies)
Total Phosphorus	56.6 kg/yr	17.9 kg/yr	68.3%	>60% (Complies)

Total Nitrogen	373 kg/yr	170 kg/yr	54.4%	>45% (Complies)
Gross Pollutants	3,870 kg/yr	98.9 kg/yr	98.9%	>90% (Complies)

Source: Costin Roe Consulting

The MUSIC modelling demonstrates that the concept treatment train of STM will provide stormwater treatment that will meet Council's reduction objective requirements effectively and economically.

Water Balance

A rainwater harvesting system will support the future development to enable re-use for non-potable applications, including toilet flushing and landscape irrigation. The aim is to reduce the non-potable water demand for the future development by a minimum of 50%. It would comprise an in-line tank for the collection and storage of rainwater, where rainwater would be pumped for distribution throughout the development in a dedicated non-potable reticulation system.

The rainwater tanks have been designed using MUSIC software to balance demand with supply, where typical water demands of toilets (0.1kL/day/toilet) and irrigation of landscaped areas (0.3kL/year/m²) have been assumed. The expected daily demand for non-potable water is outlined in **Table 55** below.

Table 55 *Indicative Non-Potable Water Demand*

Catchment	Number of Toilets	Irrigated Area	Demand
Northern Catchment	126	0m ²	12.6 kL/Day
Eastern Catchment	210	0m ²	21.0 kL/Day
Southern Catchment	84	3,700m ²	11.4 kL/Day

Source: Costin Roe Consulting

The rainwater tanks have been sized based on the calculated base water demands and proposed roof catchment areas, with the rainwater reuse requirements outlined in **Table 56** below.

Table 56 *Rainwater Reuse Requirements*

Catchment	High Flow Bypass	Tank Size in MUSIC	Predicted Demand Reduction	Provided Tank
Northern Catchment	100m ³ /s	70	52.1%	70 kL
Eastern Catchment	100m ³ /s	100	51.4%	100 kL
Southern Catchment	100m ³ /s	70	52.5%	70 kL

Source: Costin Roe Consulting

The results demonstrate that the minimum 50% reduction in non-potable water demand can be achieved for the future development with the provision of rainwater tanks sized as shown in the table above. It is noted that the final configuration and sizing of the rainwater tanks is subject to future detailed design considerations and optimum site utilisation.

Waterfront Land

The proposed Early Works are limited to bulk earthworks along the Cooks River frontage, generally aligning with the 20m/40m C2 zone, with exception of the proposed overland flow path that connects to the Cooks River along the southern boundary.

The proposed bulk earthworks are expected to be staged to minimise impacts and are accompanied by a preliminary Erosion and Sediment Control Plan (ESCP), discussed in the following section. This approach ensures that minimal harm occurs on waterfront land as a result of the proposed bulk earthworks, with future embellishment and landscaping of the Cooks River foreshore to be delivered as part of a future Detailed DA. It also ensures that future compliance can be achieved in accordance with all relevant guidelines for controlled activities on waterfront land.

The proposed overland flow path that connects to the Cooks River along the southern boundary has been designed to be consistent with the relevant consideration under the Guidelines for outlet structures on waterfront land, while also remaining consistent with the Local VPA with Bayside Council (refer to **Section 1.4.4**). Specifically, the design of the outlet structure for the overland flow path has:

- A stable and specific point of discharge;
- Minimised the construction footprint and proposed extent of disturbance, where feasible and without impacting future publicly accessible open space;
- A discharge location is consistent with existing drainage routes, where the overland flow path formalises this route;
- A bund at the discharge point to manage overland flow and prevent tidal backflow from the Cooks River;
- Stilling ponds to retain and slow overland flow during rainfall events, minimising volume and velocity at the discharge point; and
- Integrated the discharge point into the Cooks River foreshore through a smooth connection that aligns with river banks, including a 20m long rip-rap energy dissipater.

Erosion and Sediment Control

A preliminary ESCP has been prepared to support the carrying out of the Early Works and mitigate any impacts on water pollution. The preliminary ESCP is presented in **Figure 73** and should be read in conjunction with the Civil Engineering Report (**Appendix HH**).

The Site is identified as comprising waterfront land, being positioned adjacent to the Cooks River. The Early Works seek to enable the initial site preparation works that limit impacts on the foreshore. The preliminary ESCP includes key mitigation measures, including construction of sediment basins, sediment fencing and stabilised site access.

A detailed ESCP will be prepared prior to the issue of a Construction Certificate, together with the implementation of other management measures such as:

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

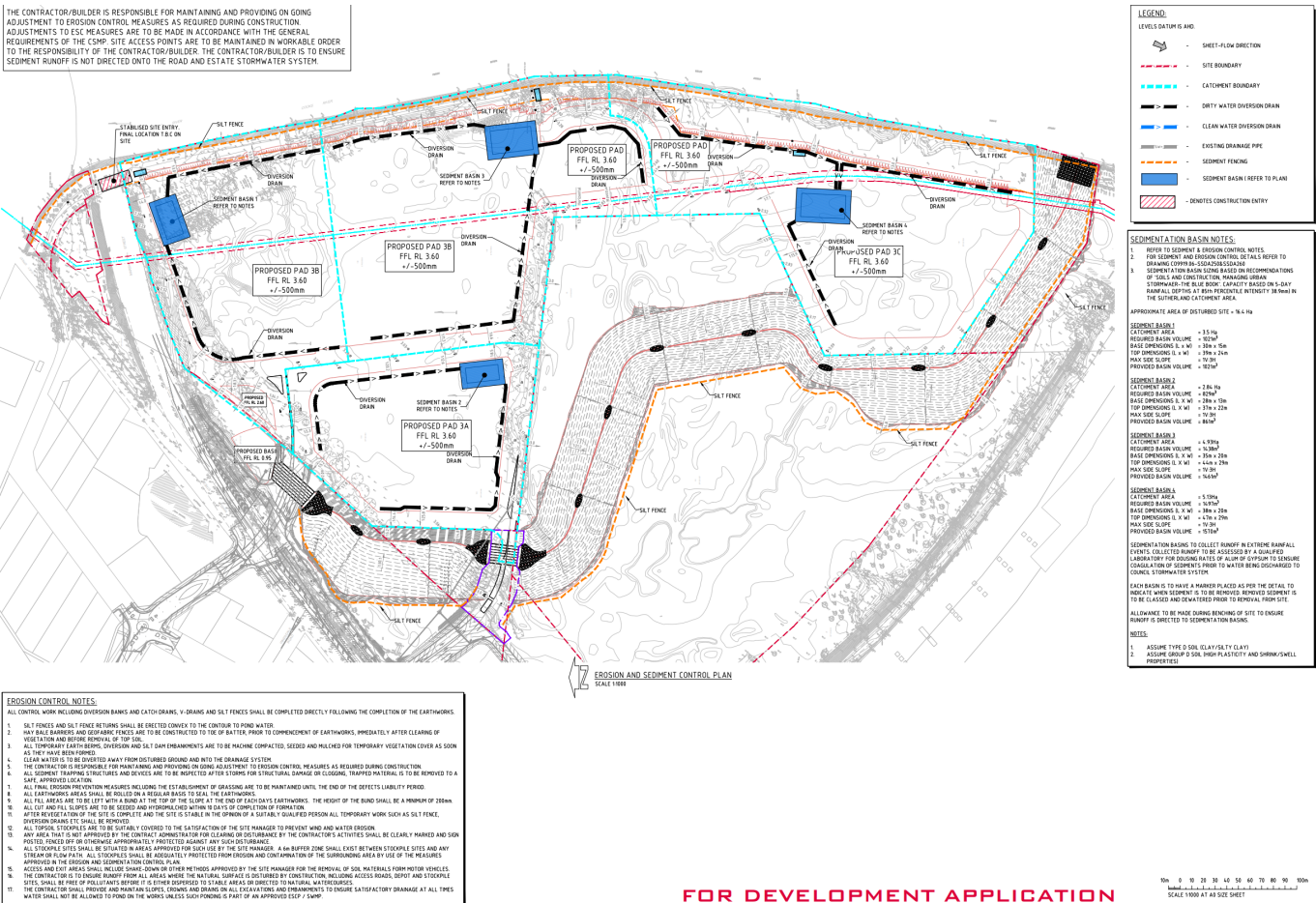


Figure 73 Erosion and Sediment Control Plan

Source: Costin Roe Consulting

6.16.4 Mitigation Measures

The proposed mitigation measures for water management are outlined in **Table 57** below.

Table 57 *Mitigation Measures – Water Management*

Potential Impact	Mitigation Measure
Erosion and sediment run-off	• An Erosion and Sediment Control Plan (ESCP) will be implemented during the construction phase by the construction contractor. • The controls included in the ESCP are to be reviewed and updated as the design, staging and construction methodology is further developed for the Proposal. • The construction contractor is to maintain the erosion and sediment control measures and is to inspect the Site after every rainfall event and at least weekly. • The following management measures are to be implemented during the construction phase, where feasible and reasonable: - Minimising the extent of disturbed areas across the site at any one time. - Progressive stabilisation of disturbed areas or previously completed earthworks to suit the proposal once trimming works are complete. - Regular monitoring and implementation of remedial works to maintain the efficiency of all controls

6.17 Flooding

A Flood Impact Risk Assessment (FIRA) has been prepared by Costin Roe Consulting and is included at **Appendix II**. It assesses the potential impacts of the Proposal on surrounding land and flood hazard of the Site, including comparison of pre- and post-development scenarios.

6.17.1 Methodology

The FIRA comprises a detailed site-specific TUFLOW model of the pre- and post-development conditions, completed with consideration towards the NSW Flood Risk Management Manual 2023 and Council Policy. The model has been prepared utilising the TUFLOW model prepared by WMAwater for Council for the existing 'Bonnie Doon Flood Study', with some modifications to the tailwater conditions to assist with the confluence conditions of the more dominant riverine conditions in larger events.

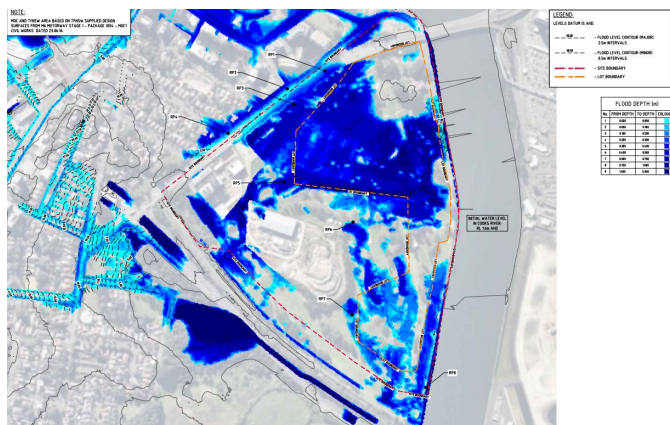
A baseline model and pre-development conditions have been based on the Council model with minor variations to the modelling surface with the inclusion of a site-specific survey and inclusion of the M6 Stage 1 control area and surrounding area. Post-development modelling has been completed with the introduction of the Proposal, including the proposed overland flow path (refer to **Section 3.3.2**) and External Roadworks DA (DA-2026/50) (refer to **Section 1.5.1**). A full suite of storm events have been modelled, including the 10%, 5%, 1%, 0.5% and 0.2% Annual Exceedance Probability (AEP), as well as Probable Maximum Flood (PMF) events.

The downstream water level boundary has been defined based on the Cooks River study water levels for the various storm events. The adopted levels are noted to be increased from Council's baseline model to account for climate change and to model a more conservative baseline condition.

6.17.2 Existing Environment

The modelling of the pre-development (existing) scenario identifies the Site as being affected by the 1% AEP flood event to the north-western portions of the development area and parts of the southern portion of the development area. The flood depths and hazard associated with the pre-development 1% AEP event is shown in **Figure 74**.

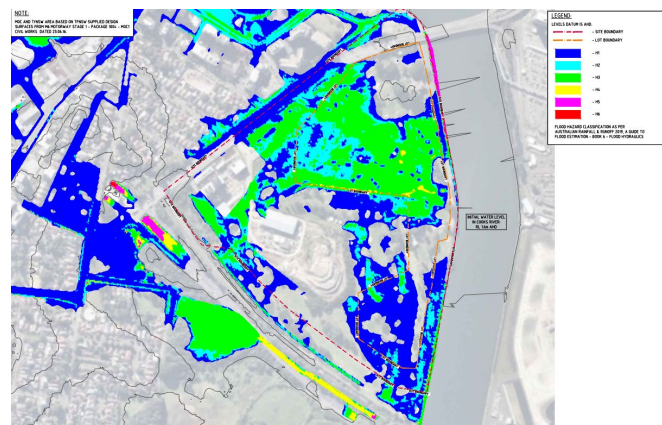
The Site is also identified as being affected by the PMF flood event, primarily to the north-western and southern portions of the development area. The flood depths and hazard associated with the pre-development PMF event is shown in **Figure 75**.



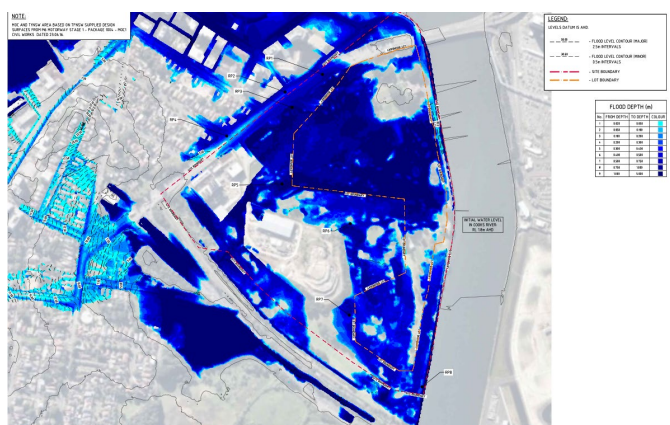
Flood Levels and Depths

Figure 74 Pre-Development Flood Mapping – 1% AEP Event

Source: Costin Roe Consulting



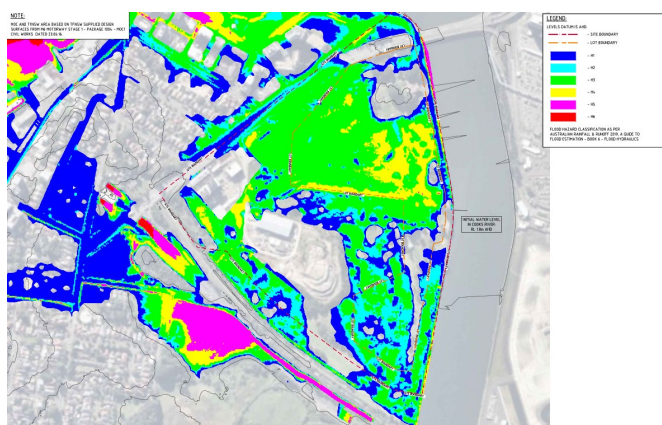
Flood Hazard



Flood Levels and Depths

Figure 75 Pre-Development Flood Mapping – PMF Flood Event

Source: Costin Roe Consulting



Flood Hazard

6.17.3 Assessment of Impacts

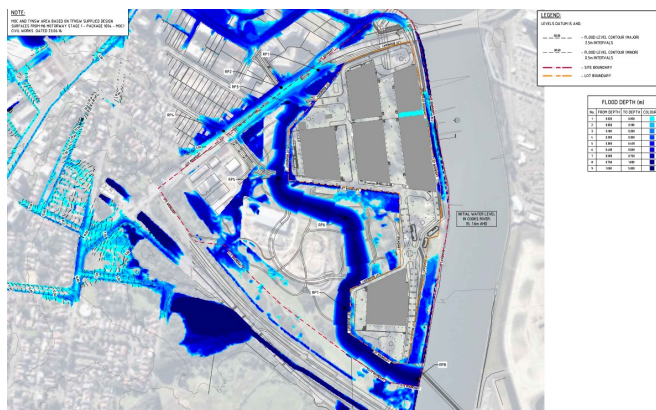
Flood Risk and Impact

To mitigate flood risk and render the Site suitable for development, an overland flow path is proposed through the Site as part of the flood mitigation and emergency response strategy. It has been designed to carry flows in infrequent events, representing a wide and unobtrusive system with crossfalls of around 1:20 (5%) supporting grades that are readily traversable in dry weather events. The proposed overland flow path is described in **Section 3.3.2** and depicted in the Civil Drawings (**Appendix N**).

The post-development flood model has been prepared with the introduction of the Proposal, including the proposed overland flow channel. The post-development scenario for the 1% AEP (1-in-100 year) flood event is presented in **Figure 76**, while the post-development scenario for the PMF event is presented in **Figure 77**.

The post-development flood modelling for the 1% AEP event demonstrates that the change in flood surface levels between the existing and developed scenario are located within the development area and largely do not affect areas outside, such as the Arncliffe MOC site or surrounding properties. Overall, there is shown to be less flooding upstream and adjacent to the development area throughout the broader catchment due to the inclusion of the overland flow path, rather than through being backed up within the former golf course as shown in the pre-development scenario.

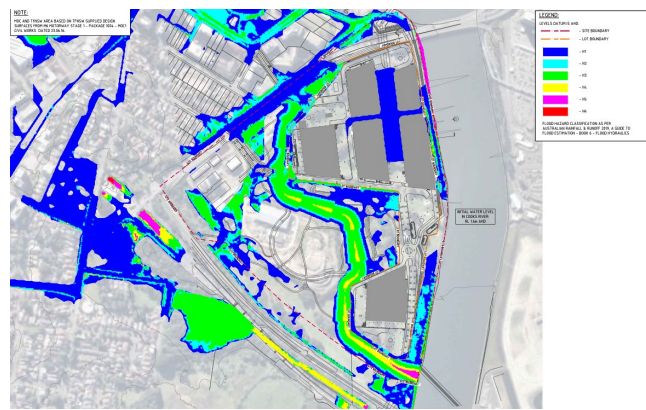
It is noted that activation of the overland flow path due to riverine behaviour occurs above the 5% and near to the 1% AEP event. However, local runoff conditions will activate the overland flow path in lower order events like the 10% AEP and 5% AEP. These local events would likely be coupled with intense rainfall and likely be present for short periods of time only.



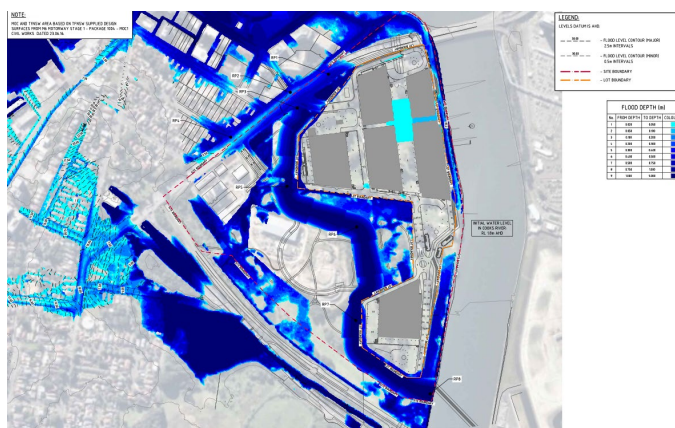
Flood Levels and Depths

Figure 76 Post-Development Flood Mapping – 1% AEP Event

Source: Costin Roe Consulting



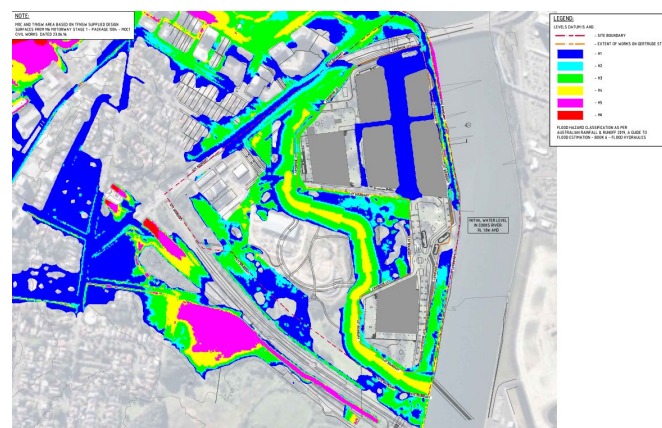
Flood Hazard



Flood Levels and Depths

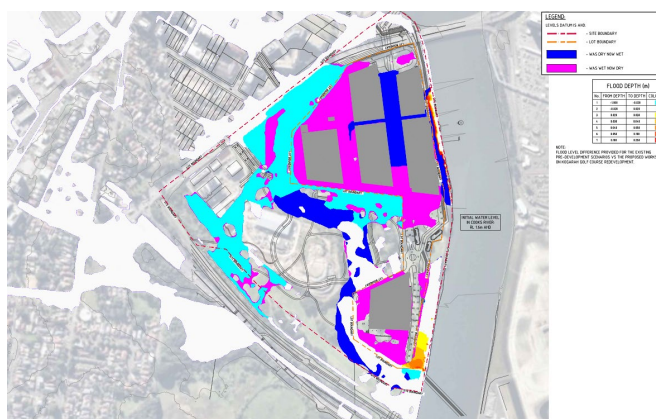
Figure 77 Post-Development Flood Mapping – PMF Flood Event

Source: Costin Roe Consulting

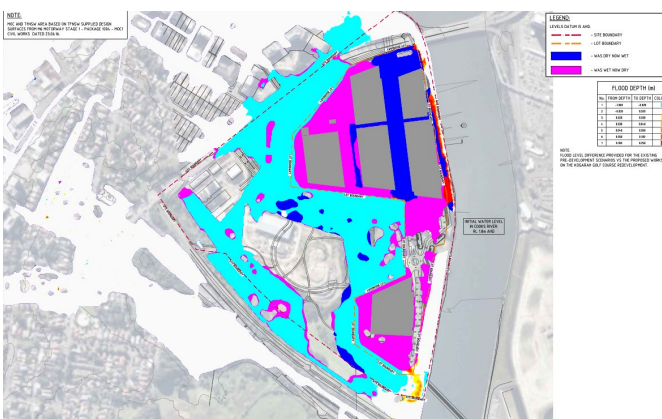


Flood Hazard

A comparison of the flood levels between the pre- and post-development scenarios for the 1% AEP and PMF flood events is provided in **Figure 78**. These indicate that there is afflux present on the Site, both within the proposed overland flow channel that traverses through the Site from Marsh Street and discharges to Cooks River. The area with the largest increase occurs on the southern part of the Site prior to the channel discharge into Cooks River. Furthermore, the results show minimal afflux on neighbouring properties. Due to these factors, it is considered that the Proposal does not cause undue flood risk and that surrounding properties will not be affected through increased damage or hazard.



1% AEP Event



PMF Flood Event

Figure 78 Flood Level Afflux Plans – 1% AEP and PMF Flood Events

Source: Costin Roe Consulting

Further, results from the flood afflux modelling for the climate change scenarios have been undertaken which demonstrate minimal flood level change compared to existing conditions and show similar results to the 1% afflux conditions. Costin Roe Consulting have confirmed the increase in rainfall intensities will achieve the required minimum

0.5m freeboard to the proposed levels in relation to overland flow paths from external and local catchments. Overall, flood immunity of the development area would not be compromised given a large available freeboard amount much larger than minimum 0.5m values generally adopted.

Flood Emergency Management

Site evacuation is available along Marsh Street during storm events including the 0.2% AEP, with an evacuation route towards St George Hospital or the NSW SES Bayside Unit to the south-west.

In the event of a storm exceeding the 0.2% Annual Exceedance Probability (AEP) threshold, a shelter-in-place strategy will be implemented. During these rare and extreme flood events, site access and egress will be temporarily restricted due to hazardous conditions. The anticipated duration of isolation is less than six (6)hours, after which conditions are expected to improve. This strategy is proposed exclusively for these infrequent events to ensure occupant safety and manage residual flood risk effectively.

The assessment of the flood conditions at the Site requires the implementation of flood safety and evacuation measures during construction and future operation of the Proposal, taking into consideration the recommendations of Flood Risk and Impact Assessment (ARUP, 2024) that supported the previous Planning Proposal (PP-2022-1748). Therefore, the proposed mitigation measures outlined in **Section 6.17.4** include the preparation of Flood Emergency Response Plans.

6.17.4 Mitigation Measures

The proposed mitigation measures for flooding are outlined in **Table 58** below.

Table 58 Mitigation Measures – Flooding

Potential Impact	Mitigation Measure
Flood event during construction	• A Construction Flood Emergency Response Plan (CFERP) must be prepared prior to the commencement of construction, including details on: - The flood emergency response procedures to be implemented during construction, including procedures for vehicles entering and exiting the site; - Predicted flood levels; - Flood warning time and flood notification; - Assembly points and evacuation routes; - Evacuation and refuge protocols; and - Awareness training for employees and contractors.
Flood event during future operation	• An Operational Flood Emergency Response Plan (OFERP) must be prepared prior to the commencement of operation of the future development. Consideration towards the requirements of the OFERP are to be detailed as part of future Detailed DAs, including: - The flood emergency responses for operation of the development; - Updated assembly points, refuge areas and evacuation routes; - Evacuation and refuge protocols for all employees, contractors and visitors; and - Awareness training for operational employees and contractors.

6.18 Geotechnical

A Geotechnical Investigation has been prepared by Douglas Partners and is included at **Appendix JJ**. It presents the results of the geotechnical testing and provides comments for consideration as part of the detailed design of the future development. It is supported by an Acid Sulphate Soil Assessment and Management Plan at **Appendix KK** and a Salinity and Erosion Investigation and Management Plan at **Appendix LL**.

6.18.1 Methodology

The investigation of the geotechnical conditions has been informed by previous investigations undertaken for the Site, as well as public desktop data on the geology, soil landscape, acid sulphate soils and salinity of the Site.

In addition, the investigation included field studies which were undertaken at the Site between the 29 September 2025 and 14 October 2025. This consisted of drilling ten (10) boreholes to depths between 8.0m and 24.7m across the Site. Further, five (5) groundwater monitoring wells were installed at the completion of drilling at selected boreholes.

The testing locations informing the geotechnical investigation are illustrated in **Figure 79** below.

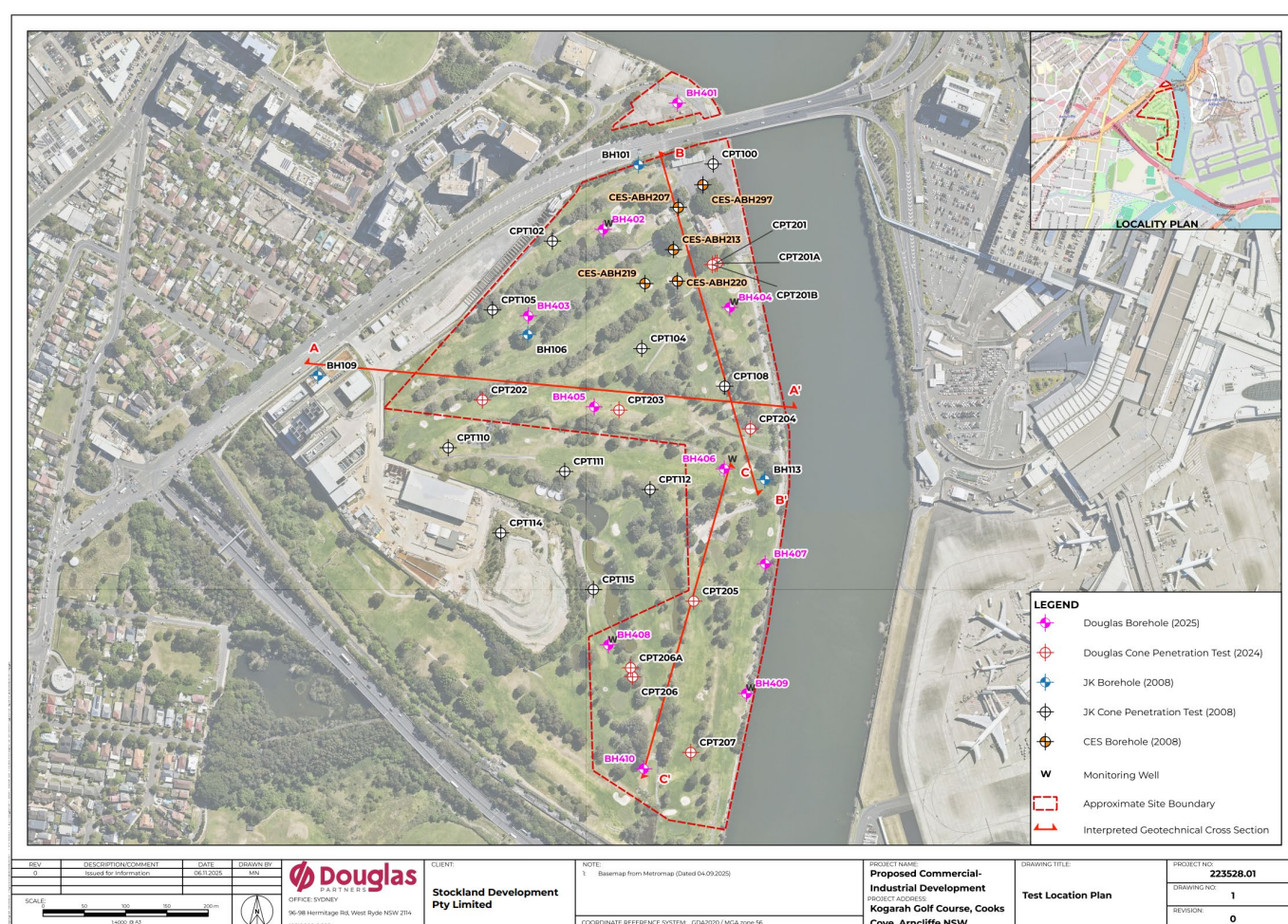


Figure 79 Geotechnical Test Location Plan

Source: Douglas Partners

6.18.2 Existing Environment

The Site is primarily underlain by freshwater swamp material comprising of estuarine marine deposits of the Quaternary period. Borehole testing across the Site indicates the following subsurface conditions:

- Fill – Depth: 0.3-3.6m;
- Clay and silt (very soft to firm) – Depth: 1.7-7.8m
- Sand (very loose, loose and medium dense) – Depth: 3.8-8.0m
- Interbedded clay and sand – Depth: 8.0-25.2m

Groundwater was observed in all boreholes during drilling at depths between 0.4m and 2.5m, except at BH409. Groundwater levels measured in monitoring wells to depths between 0.6m and 1.8m.

Saline soils are identified across the Site, particularly at the southern end of the Site within silty and clayey soils. Very saline soils were found in samples from BH409 below 0.9m depth. While highly saline soils were found in samples of BH408 below 1m depth and at BH410 from 2m depth, which are located at the southern end of the Site.

Testing of soils across the Site has indicated that the soils are 'non aggressive to severe' with respect to steel, and 'non-aggressive to moderate' with respect to concrete. The Site is indicated on the Acid Sulphate Soils Risk map as within an area of high probability of acid sulphate soils between depths of 1-3m.

6.18.3 Assessment of Impacts

Civil Strategy

The Early Works include civil works to facilitate the future development, which will have regard to the geotechnical advice outlined in the Geotechnical Investigation (**Appendix JJ**). It is concluded that following the implementation of the recommended earthworks design and methods recommended, the civil works required, and future construction of the development will be suitably achievable at the Site.

Acid Sulphate Soils

An Acid Sulphate Soil Assessment and Management Plan (**Appendix KK**) has been developed to ensure that the potential for acid sulphate soils is effectively managed on the Site. Further testing of soils undertaken indicate the acid sulphate soils are present at the site between 0.9m and 9.0m and are likely to be associated with the estuarine and alluvial deposits across the Site.

Based on the result of this and previous investigations, it was determined that any excavations which disturb or uncover natural soils from low lying areas have e.g. estuarine and alluvial soils with a surface level below RL 5m AHD, have the potential to oxidise and disturb Acid Sulphate Soils.

The assessment provides a range of recommendations to neutralise and treat acid sulphate soils, as well as monitoring requirements, emergency response procedures and contingency measures required for the management of the risk of acid sulphate soils. This includes on-site treatment/neutralisation, followed by off-site disposal and/or on-site reuse of acid sulphate affected soils. Potential treatment methods of soils on site include the preparation of treatment pads, neutralising materials and liming rate and trenching works.

Further testing including a data gap assessment at targeted location is recommended to be undertaken at parts of the Site where bulk earthworks cutting is proposed. It is concluded that following the implementation of management measures the impact of acid sulphate soils will be suitably managed at the Site.

Salinity

A Salinity and Erosion Investigation and Management Plan (**Appendix LL**) has been prepared to effectively manage salinity at the site and minimise its effects and protect the Proposal from damage due to salinity. It provides key recommendations to manage salinity at the site in relation to earthworks, imported soils, landscaped areas, stormwater and drainage and the durability of concrete structure in contact with the ground. It is concluded that following the implementation of recommendations, the Proposal can effectively manage saline soils.

6.18.4 Mitigation Measures

The proposed mitigation measures for geotechnical impacts are outlined in **Table 59** below.

Table 59 Mitigation Measures – Geotechnical

Potential Impact	Mitigation Measure
Impacts of acid sulfate soils	Neutralisation and treatment of Acid Sulphate Soils at the Site is to be treated in accordance with the Acid Sulphate Soil Management Plan prepared by Douglas Partners, dated 26 March 2026.
Impacts of salinity	Earthworks at the Site is to be undertaken generally in accordance with the recommendations and measures provided in the Salinity and Erosion Management Plan prepared by Douglas Partners, dated 20 March 2026.

6.19 Contamination

A Preliminary Site Investigation (PSI) and Detailed Site Investigation (DSI) has been prepared by Douglas Partners and is included at **Appendix NN** and **Appendix NN** respectively. The PSI assesses the overland flow path, while the DSI assesses the development area. It has informed a Remediation Action Plan (RAP) has been prepared by Douglas Partners and is included at **Appendix OO**. These reports identify existing contamination on the Site, as well as measures to remediate and manage contamination.

6.19.1 Methodology

The contamination reporting has been prepared in accordance with the NEPC *National Environment Protection Measure 1999*, NSW EPA *Guidelines for Consultants Reporting on Contaminated Land* and CRC CARE *Remediation Action Plan: Development - Guideline on Establishing Remediation Objectives*.

The investigation of potential contamination at the Site was undertaken with regard to the following previous reports which were reviewed. The data and findings of these reports were used to support an updated assessment of contamination at the Site:

- *Environmental Site Assessment, Cooks Cove Development Zone* (Consulting Earth Sciences, 2023);
- *Environmental Site Audit Assessment Report, 19 Marsh Street, Arncliffe NSW* (Consulting Earth Sciences, 2023);
- *Remediation Action Plan, Northern Precinct, Cook Cove Development Zone* (Consulting Earth Sciences, 2023);

The RAP identifies the remediation strategy/framework to be adopted by an assessment of remedial options including protocols for addressing unexpected contamination finds. It also documents the procedures and standards to be followed to remove the risks posed by contamination and aesthetic impacts to make the Site suitable for the proposed commercial/industrial land uses, while ensuring the protection of human health and the surrounding environment.

6.19.2 Existing Environment

The development area is identified as comprising four (4) Underground Storage Tanks (USTs) within the previous golf club car park adjacent to the existing maintenance facility. The soil immediately surrounding the tanks are also identified as comprising concentrations of Benzene, Toluene, Ethylbenzene and Toluene (BTEX) exceeding the Site Assessment Criteria (SAC). The Site is also identified as comprising surficial Asbestos Contaminated Material (ACM) along the Cooks River foreshore.

6.19.3 Assessment of Impacts

The DSI identifies that remediation of the USTs and associated BTEX impacted soil, as well as the ACM observed on the ground surface of the Cooks River foreshore, requires remediation. It recommends that a RAP is prepared to establish remediation and validation strategies for the above contamination, as well as:

- The requirement for a Hazardous Building Materials Survey of the golf course clubhouse and ancillary buildings (including the maintenance shed) prior to demolition, and validation of building footprints following demolition;
- A Sampling and Analysis Quality Plan (SAQP) to inform the completion of a supplementary contamination investigation to further assess identified areas; and
- An Unexpected Finds Protocol (UFP) that includes contingency remediation or management strategies to address any additional contamination identified during the supplementary investigation.

The PSI identified several data gaps that require further investigation to assess the suitability of the site, from a contamination perspective, for the proposed use. Based on the identification, Douglas Partners recommend that the Remediation Action Plan be updated to:

- Extend the RAP site boundary to incorporate the site;
- Include the requirement for a Hazardous Building Materials Survey of the pump shed and water tanks prior to demolition, and validation sampling of the building footprints post demolition;
- Obtain and review any contamination land reporting held by Council associated with the parts of the site within the M6 Stage 1 construction compound; and

- Incorporate the requirements for further investigation into the SAQP to inform a supplementary contamination investigation.

A RAP has been prepared to address the above requirements, identify a preferred remediation strategy (described in **Section 3.3.1**) and validation strategies for contamination. It outlines the remediation acceptance criteria for the proposed remediation, including no detection of ACM in soil samples and contaminants of potential concern samples below the SAC.

Douglas Partners consider that the Site can be made suitable for the Proposal, subject to implementation of the RAP.

A hazardous building materials survey will be completed prior to the demolition of the golf course clubhouse, ancillary buildings (including the maintenance shed), pump shed and water tanks. In addition, supplementary investigations are to be completed prior to remediation with reference to the SAQP included at Appendix C of the RAP (**Appendix OO**). These requirements form part of the proposed mitigation measures outlined in **Section 6.19.4**.

Following completion of the remediation works, a validation assessment report will be prepared by the Environmental Consultant in accordance with NSW EPA *Guidelines for Consultants Reporting on Contaminated Land*.

6.19.4 Mitigation Measures

The proposed mitigation measures for contamination are outlined in **Table 60** below.

Table 60 *Mitigation Measures – Contamination*

Potential Impact	Mitigation Measure
Remediation	• All Underground Storage Tanks and Asbestos Containing Material located on the Site are required to be remediated in accordance with the Remediation Action Plan (RAP) dated 6 May 2026.
Unknown impacts	• Supplementary investigations must be completed prior to the commencement of remediation with reference to the Sampling and Analysis Quality Plan at Appendix C of the Remediation Action Plan (RAP). The SAQP references the adopted Site Assessment Criteria (SAC) which are provided in Appendix D of the RAP. The Environmental Consultant will assess the results of the supplementary investigations and determine the need for remediation/management in accordance with the remediation strategies in the RAP or in accordance with the contingency plan and unexpected finds protocol (Appendix G of the RAP) as appropriate.
Hazardous Building Materials	• A Hazardous Building Materials Survey must be completed prior to the demolition of the golf course club house, ancillary buildings (including the maintenance shed), pump shed and water tanks. The assessment must identify Asbestos Containing Material, lead-based paint, Polychlorinated biphenyls-containing equipment, synthetic mineral fibres, and other regulated hazardous materials to ensure compliance with SafeWork NSW requirements and to inform appropriate management during demolition, remediation and building footprint validation sampling.
Unexpected Finds Protocol	• An Unexpected Finds Protocol (UFP) must be developed and implemented prior to the commencement of works. The UFP will provide a protocol for the management of any unexpected finds encountered during the remediation of the Site.

6.20 Infrastructure Requirements

A Service Infrastructure Assessment has been prepared by Lucid Consulting and is included at **Appendix PP**. It is supported by a Preliminary Water Servicing Strategy prepared by AT&L and included at **Appendix QQ**. The reports provide an assessment of existing and required service infrastructure to support the Concept Masterplan.

An assessment of the existing capacity and suitability of existing infrastructure and services at the site has been determined by the specific criteria and scope established for the Concept Masterplan. A summary of the existing and required service infrastructure is provided in **Table 61** below.

Table 61 *Summary of Services Infrastructure Assessment*

Service Infrastructure	Assessment
Electrical	The Site is located within the Ausgrid electricity supply network, with an existing Ausgrid Low Voltage (LV) cable service identified within the Site. The LV cable will be required to be decommissioned. There are two (2) underground 11kV high voltage feeders are identified on Marsh Street, which supply to two (2) existing Ausgrid substations. A maximum demand assessment has been completed for the Proposal, which concludes that the following estimated maximum demand is expected: • Block 1 – 828 kVA; • Block 3A – 2,884 kVA; • Block 3B (Stage 1) – 2,261 kVA; • Block 3B (Stage 2) – 4,575 kVA; and • Block 3C – 2,374 kVA. Based on this the proposed substation infrastructure arrangement will be provided in accordance with Section 3.3.2. Additionally solar photovoltaic systems will be provided on each logistics building to maximise on-site consumption and offset grid electricity demand. The proposed electricity and substation infrastructure proposed have been assessed to meet the energy requirements for the Site and will enable connection to the existing High Voltage (HV) feeders on Marsh Street.
Potable Water	Existing water supply infrastructure consists of a Sydney Water Corporation 1000mm Cast Iron Cement Lined (CICL) potable water main runs parallel to the northern boundary of the Site along Marsh Street. This water main transitions into a 250PE directional boring main located at the intersection with the Giovanni Brunetti Bridge, which transitions into a 150mm CICL pipework. The existing Kogarah Golf Club is supplied with a 100mm authority metre and connection from the Sydney Water's potable water main located at the intersection of Marsh Street and Flora Street. The capacity of the existing 100/250mm water main running along Marsh Street will be required to be confirmed by Sydney Water due to the magnitude of the proposed development. The nominated Water Services Coordinator is currently undertaking a feasibility application with Sydney Water.
Wastewater	An existing Sydney Water 225mm Cast Iron sewer main run into the Site and crosses through Marsh Street at the intersection of Giovanni Brunetti Bridge. A private pressure sewer rising main runs along the north boundary and discharges into the final manhole within the Site. The sewer rising main discharges wastewater from a private sewer compound including a pump station and storage tank. Subject to confirmation on the capacity of the 225mm Cast Iron sewer main with Sydney Water, this existing connection is deemed suitable to service the site for sewer infrastructure. The nominated Water Services Coordinator is currently undertaking a feasibility application with Sydney Water.
Telecommunication Infrastructure	A number of telecommunications carriers reticulate services adjacent to the Site. This includes NBN, Optus, Telstra and Vocus Communications which all have existing services within Marsh Street. Multiple dedicated fibre systems will be required to each for each of the future buildings, via an underground lead in communications pit and pipe network along the future internal road network. The telecommunications infrastructure has been assessed to adequately meet the demand for infrastructure at the Site and will ensure successful telecommunications connections to the Site.
Gas	There is currently no proposed connection to gas infrastructure at this stage.

6.21 Public Benefits and Voluntary Planning Agreements

As described in **Sections 1.4.3** and **1.4.4**, the Kogarah Golf Club Redevelopment is supported by separate executed VPAs with TfNSW and Council respectively. The executed VPAs comprise significant public benefits to the surrounding area, in-place of typical monetary contributions required under local and State development contribution plans.

The Kogarah Golf Club Redevelopment will ensure the delivery of a number of public benefits, including publicly accessible open spaces and public road infrastructure upgrades. The proposed Concept Masterplan and subsequent future Detailed DAs will support the delivery of the public benefits under the executed VPAs. A summary of each public benefit established under the executed VPAs and subsequent timing and delivery is provided in **Table 62** below.

Table 62 *Development Contributions Summary*

Item No.	Name	Delivery
State Voluntary Planning Agreement (SVPA2024-25)		
1	Marsh Street/Gertrude Street Intersection enhancement	To be delivered as part of the separate External Roadworks DA (DA-2026/50), described in Section 1.5.1 . The Applicant is seeking to commence delivery of the external roadworks as soon as practical to provide sufficient access to the Kogarah Golf Club Redevelopment.
2	Marsh Street/Flora Street intersection enhancements	
3	Flora Street East Extension interface with Arncliffe Motorway Operations Compound	
4	Additional southbound right-turn bay storage on Marsh Street at Gertrude Street intersection/signalised intersections	
5	Bus stops	
6	Monetary contribution with estimated total value of \$8.7 million	Payable in instalments, prior to the issue of each Occupation Certificate for GFA within the Developer Land as part of this SSDA and subsequent detailed DAs.
Local Voluntary Planning Agreement		
1	Gertrude Street extension and upgrade	To be delivered as part of a separate External Roadworks DA (DA-2026/50), described in Section 1.5.1 . The Applicant is seeking to commence delivery of the external roadworks as soon as practical to provide sufficient access to the Kogarah Golf Club Redevelopment.
2	Extension of Gertrude Street East	
3	Extension of Flora Street East	To be delivered as part of the Early Works, described in Section 3.3 . The Applicant is seeking to deliver Item 3 of the Local VPA as soon as practical to support access to the future Pemulwuy Park and Kogarah Golf Club Redevelopment.
4	Public open space – Cooks River Foreshore	The proposed Concept Masterplan facilitates the future delivery of the Cooks River foreshore, to be delivered together with development immediately adjacent to the foreshore. The detailed design of the Cooks River foreshore will form part of future Detailed DAs.
5	Publicly accessible open space – Fig Tree Plaza	The proposed Concept Masterplan will facilitate the future delivery of a publicly accessible plaza along the Cooks River. It explores an alternative location for Fig Tree Plaza under the Logistics Scheme, with the ultimate location to be confirmed as part of future Detailed DA.
6	Flood mitigation works – Pemulwuy Park	The Early Works seek to enable the delivery of flood mitigation works within Pemulwuy Park, in the form of the proposed overland flow path described in Section 3.3 .
7	Pemulwuy Park – embellishments	The proposed Concept Masterplan facilitates the future delivery of the embellishment works associated with the future Pemulwuy Park. The delivery of the embellishment works will form part of a separate future Detailed DA.

8	Dedication to the council free of cost to the council not less than 0.3ha of land as public open space.	The subject land will be publicly dedicated prior to the completion of works on the lot.
9	Dedication of public roads	The subject land will be publicly dedicated prior to the completion of works on the lot.
10	Dedication of not less than 0.7ha of land as public open space.	The subject land will be publicly dedicated prior to the completion of works on the lot.
11	Monetary contribution for Pemulwuy Park, Riverine Park and active transport links	The Developer has paid Council \$1,000,000 prior to the date that is 12 months from the date that the Instrument Change becomes effective under Section 3.24(5) of the EP&A Act. The remaining \$14,044,860 will be paid in instalments in accordance, provided that 80% of such balance must be paid by the earlier of the Hold Point or the Sunset Date.
12	Foreshore easement for Public open space – Cooks River Foreshore	The subject easement will be granted prior to the nominated Hold Point in the Local VPA. Public access will be provided upon the earlier of the Sunset Date and the final Occupation Certificate for the development.

7.0 Project Justification

In general, investment in major projects can only be justified if the benefits of doing so exceed the costs. Such an assessment must consider all costs and benefits, and not simply those that can be easily quantified. This means that the decision on whether a project can proceed or not needs to be made in the full knowledge of its effects, both positive and negative, whether those impacts can be quantified or not.

The Proposal seeks consent for two (2) separate components, including:

- **Concept Masterplan** – Establishment of key parameters to inform separate future detailed Development Applications for development, including maximum building envelopes, gross floor area, land uses and other parameters; and
- **Early Works** – Carrying out of initial site preparation and infrastructure works required to support future development and publicly accessible open space.

The assessment must, therefore, focus on the identification and appraisal of the effects of the proposed change over the site's existing condition. In considering the justification of the Proposal and in reference to Section 4.15 of the EP&A Act which specifies matters for consideration a consent authority must consider in determining a DA.

As such, the following relevant matters have considered:

- Design of the proposed development, including actions taken to avoid or minimise the impact of the Proposal while still achieving the associated objectives;
- Consistency with the strategic context;
- Consistency with the statutory requirements;
- The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality;
- The suitability of the Site for the development; and
- The public interest.

7.1 Design of the Proposal

The proposed Concept Masterplan and supporting Indicative Reference Schemes reflect the objectives of the development to deliver state-of-the-art facilities that will redefine the logistics landscape in Australia, setting new benchmarks for scale, efficiency, architectural design, sustainability and innovation. The Proposal achieves this by:

- Optimising the permissible land uses and GFA to deliver a world-class precinct which delivers significant economic benefits to the State and local area;
- Illustrating a design which responds to the surrounding context, and appropriately manages bulk, height and scale;
- Providing a development that meets market requirements for multi-level logistics development; and
- Facilitating a proposed Concept Masterplan which provides flexibility for future land uses on the site for logistics and mixed uses to be provided based on future market demand.

The design of the Proposal ensures the delivery of the highest and best use of the Site, while responding the Site's surrounding context and is consistent with the desired future character.

7.2 Consistency with Strategic Context

The Proposal is consistent with the strategic context of the site through developing a world-class precinct in close proximity to Sydney International Airport and Port Botany, two international trade gateways. It aligns with regional plans including the Region Plan and District Plan through delivering a development which supports necessary road infrastructure works and upgrades alongside a logistics and mixed-use development.

Further, the proposal will support the growth of international trade gateways, by supporting the predicted growth in shipping volumes and demand for logistics floorspace. It will align with the local strategic framework, through delivering a key portion of the 'Bay to Bay' pedestrian and cycleway link, upgrading key intersections surrounding the site and

delivering new public and active transport connections. Overall, site supports the vision and planning priorities for the Bayside LGA and Greater Sydney.

7.3 Consistency with the Statutory Requirements

In accordance with Section 4.15(1)(a) of the EP&A Act, the Proposal is generally consistent with the relevant statutory requirements, including the relevant provisions of the EP&A Regulation and EPIs. The consistency of the Proposal with the relevant statutory requirements is outlined in **Section 4.0** and the Statutory Compliance Table (**Appendix C**).

It is acknowledged that the Proposal is inconsistent with the Height of Buildings development standard under Clause 4.3 of the Bayside LEP 2021. The proposed height variation is sought under Clause 4.6 of the Bayside LEP 2021 which provides an appropriate degree of flexibility in applying certain development standards, and to achieve better outcomes for and from development by allowing flexibility in particular circumstances.

As outlined in **Section 7.3.2**, the proposed variation is supported by a Clause 4.6 Variation Request (**Appendix P**) which demonstrates the matters in Clause 4.6(3) of the Bayside LEP 2021 are achieved and the consent authority may therefore grant consent notwithstanding the contravention of the Height of Buildings development standard.

7.3.1 Consistency with the Objects of the Act

The Proposal is consistent with the relevant Objects of the Act and will not result in any unjust or significant environmental impact, for the following reasons:

- It will increase the economic and social welfare of the Bayside LGA and State by supporting between 1,750 to 2,890 direct ongoing full-time jobs and between \$470 million and \$630 million in direct value-add each year once complete and fully occupied;
- It will facilitate the ecologically sustainable development of the Site, with economic, environmental and social considerations integrated into the Proposal;
- It constitutes the orderly and economic development of the Site, to meet the demand for industrial and employment floor space in proximity to a key trade and logistics gateway, the Sydney International Airport.
- It promotes good design, with the layout, landscaping, built form and external façade of the Proposal presenting a resolved solution that will contribute to the creation of amenity;
- It will promote the proper construction and maintenance of buildings within the precinct, creating a high-quality precinct for future tenants, workers and visitors; and
- It has provided and will continue to provide the opportunity for the local community and stakeholders to participate in consultation of the development.

7.3.2 Clause 4.6 Variation Request – Height of Buildings

As outlined in **Section 6.1** and the supporting Clause 4.6 Variation Request (**Appendix P**), the Concept Masterplan seeks to vary the Height of Buildings development standard for Block 2, 3A and 3B from RL 51m AHD (approx. 47.4m above future ground level) to RL 70m AHD (approx. 66.4m above future ground level) as part of the proposed building envelopes.

The proposed variation represents a 19m (37.25%) variation to the development standard and is driven by the following key aspects:

1. Achievement of the maximum permissible GFA of 340,000m² on Lot 100 DP1231954, only feasible through 6-storey logistics buildings once necessary loading and service areas are incorporated;
2. Provision of appropriate flexibility in warehouse floor-to-floor heights to accommodate all potential warehouse racking heights and the ability to integrate three (3) levels of car parking on Ground Floor; and
3. Ability to achieve improved built form outcomes, while also achieving the maximum permissible GFA, on Block 2 under the Alternative Uses scheme by enabling more linear tower forms.

The proposed variation will ensure that the capacity of the strategically significant site is maximised and provides necessary flexibility to meet the operational requirements of future tenants, as well as the ability for improved built form outcomes on Block 2 under the Alternative Uses scheme.

The assessment demonstrates that compliance with the Height of Buildings development standard contained in Clause 4.3 of the Bayside LEP 2021 is unreasonable and unnecessary in the circumstances and that there are sufficient environmental planning grounds to justify the contravention. It is considered that the variation allows for the orderly and economic use of the land in an appropriate manner, whilst also allows for a better outcome in planning terms.

The Clause 4.6 Variation Request demonstrates that the following notwithstanding the non-compliance with the Height of Buildings development standard:

- Compliance with the development standard would be unreasonable and unnecessary, because:
 - It is consistent with the desired future character of the area, where the variation demonstrates airport safeguarding is maintained, which was the basis of the development standard under the previous Planning Proposal (PP-2022-1748);
 - It only results in minor additional visual and view impacts compared to those under a compliant height, with additional impacts to be mitigated through the implementation of built form and urban design measures;
 - It does not result in any additional impacts to loss of privacy or solar access to the existing surrounding development; and
 - It demonstrates appropriate transitions in built form and land use intensity is maintained to the surrounding context.
- There are sufficient environmental planning grounds to justify the contravention, including:
 - It maintains compliance with the maximum permissible GFA on Lot 100 DP1231954 (340,000m²) under Clause 6.20 of the Bayside LEP 2021, including estimated traffic generation that is consistent or less than that assessed under the previous Planning Proposal (PP-2022-1748);
 - It supports reduced vehicle trips on the regional road network and reduced travel distances by realising the maximum permitted GFA, subsequently reducing the reliance on distribution centres in Western Sydney to process freight ultimately bound for Eastern Sydney where homes and jobs are most concentrated;
 - It results in minor/moderate additional overshadowing to the future Pemulwuy Park in mid-winter that will be minimised through the detailed design of future buildings, subject to future Detailed DAs;
 - It demonstrates that airport safeguarding can be suitably achieved and DITRDCSA may issue a controlled activity approval;
 - It includes significant economic benefits to the NSW economy through enabling achievement of the maximum permissible GFA, specifically:
 - Delivering critical industrial floorspace in Eastern Sydney on a site with demonstrated capacity for increased intensity and efficiency in close proximity to nationally significant trade gateways;
 - Supporting the creation of an additional 560 new jobs, comprising 220 direct and a 340 indirect FTE jobs; and
 - Generating an additional \$130 million in value per annum, comprising \$70.0 million in direct and a further \$60.0 million in indirect value added.
 - It is consistent with the aims of the Bayside LEP 2021, particularly enhancing the function and roles of Sydney Airport and Port Botany;
 - It does not restrict achievement of design excellence in accordance with Clause 6.10 of the Bayside LEP 2021; and
 - It complies with the objects of the EP&A Act.

Further, it is noted that the Site is highly unique, both in terms of the constraints that require the proposed height exceedance, and the opportunity that the strategically significant site presents. Specifically, it represents a generational opportunity to maximise the capacity and efficiency of a site directly adjacent to Sydney Airport to ultimately support the growth of Sydney Airport and broader projected population growth of Eastern Sydney over the operational lifespan of the development. Considering these factors, the proposed variation does not give precedent to other development which do not comprise these unique elements.

Therefore, the consent authority can be satisfied that the Clause 4.6 Variation Request has demonstrated the matters in Clause 4.6(3) of the Bayside LEP 2021 and may grant development consent notwithstanding the contravention of the Height of Buildings development standard.

7.4 Stakeholder Views

As outlined in **Section 5.0**, engagement with stakeholders has been undertaken by Colliers Urban Planning and the Applicant in accordance with the *Undertaking Engagement Guidelines for State Significant Projects* (DPHI, 2024). It is supported by an Engagement Report (**Appendix Q**), which identifies engagement undertaken with stakeholders.

The engagement undertaken included engagement with the community through the distribution of newsletters to the surrounding area and two (2) community drop-in sessions on 25 November 2025 and 27 November 2025 at the adjacent Rowers on Cooks River. The matters raised by the community included:

- Project rationale;
- Building height, bulk and scale;
- Land use and employment;
- Land ownership;
- Traffic and parking impacts;
- Pedestrian and vehicular movement and access;
- Visual impacts;
- Public domain and landscaping;
- Tree removal;
- Open space and foreshore access;
- Airport link;
- Project timeline and staging; and
- Planning process.

The Applicant has addressed the matters raised by the community in **Section 5.0** and will continue to inform and consult with the community as part of the Kogarah Golf Club Redevelopment.

The Applicant has also undertaken engagement with other key stakeholders, including elected representatives, DPHI, Bayside Council, TfNSW, Sydney Airport and service and utility providers. It has also undertaken engagement with traditional custodians, elders, and knowledge holders of Bidjigal Country to inform the development of the Connecting with Country Framework (**Appendix K**). The broader Aboriginal community has also been consulted regarding the heritage management of the project throughout its lifespan as part of the Aboriginal Cultural Heritage Assessment Report.

The Applicant is committed to ongoing stakeholder engagement following the submission of the EIS. This includes during the exhibition and assessment of the project and following a determination.

7.5 Likely Impacts of Development

Having regard to the natural environment, built environment and economic and social impacts of the Proposal, the likely impacts of development are considered acceptable as outlined in the following subsections. The assessment of impacts is accompanied by proposed mitigation measures, provided throughout **Section 6.0** and consolidated at **Appendix D**, which will minimise the impact of the Proposal.

7.5.1 Natural Environment

The environmental impact assessment of the Proposal has demonstrated that it will not result in unreasonable environmental impacts. Any expected environmental impacts can be suitably managed through the implementation of appropriate mitigation measures.

7.5.2 Built Environment

The Proposal has been designed to maximise logistic and employment generating floorspace on the Site given its proximity to Sydney Airport, while also delivering significant improvements to the amenity of the Site and surrounding area. The EIS has demonstrated that the proposed built form is compatible with its surrounding context and will enable the delivery of a world class precinct adjacent to nationally significant trade gateways.

7.5.3 Social and Economic

The Proposal will deliver significant social benefit to the community through the creation of jobs in close proximity to existing housing and transport connections. It will also include the delivery of significant public open spaces including foreshore improvements. Any negative social impacts of the proposed development can be adequately mitigated by the proposed mitigation measures (**Appendix D**).

Further, the Proposal will not result in any likely significant or detrimental economic impacts. It will result in significant impact inputs into the local and state economy, including between 1,750 to 2,890 direct ongoing full-time jobs and between \$470 million and \$630 million in value-add each year once complete and fully occupied. It also responds to the

limited industrial land supply in Eastern Sydney by delivering more intensive and efficient development on a site with demonstrated capacity, subsequently supporting expected population growth in Eastern Sydney and growth of surrounding nationally significant trade gateways of Sydney Airport and Port Botany.

7.6 Suitability of the Site

Having regard to the characteristics of the Site and its immediate surrounding context, the Proposal is suitable for the Site for the following reasons:

- It constitutes land uses permissible with consent under the Bayside LEP 2021 and consistent with the previous Planning Proposal (PP-2022-1748);
- It involves the renewal of an underutilised site to deliver a significant contribution of floorspace for trade-related enterprise and employment uses, combined with new publicly accessible open space;
- It is positioned in close proximity to Sydney Airport and Port Botany, representing nationally significant trade gateways;
- It will facilitate the highest and best uses for the Site, including significant logistics floorspace adjacent to Sydney Airport and other trade-related enterprise uses; and
- It specifically supports the projected growth of Sydney Airport, including forecasted growth in air freight processed from 0.6 million tonnes in 2024 to 1.4 million tonnes in 2045.

7.7 Public Interest

Having regard to the public interest, the Proposal is in the public interest for the following reasons:

- It is consistent with relevant state and local strategic plans and generally complies with the relevant state and local planning controls, with any variation justified in accordance with relevant provisions;
- It delivers significant economic benefits to the local area and wider state through the creation of a world-class precinct which will provide jobs and economic output throughout its construction and operation;
- It responds to the limited industrial land supply in Eastern Sydney by delivering more intensive and efficient development on a site with demonstrated capacity, subsequently supporting expected population growth in Eastern Sydney and growth of surrounding nationally significant trade gateways of Sydney Airport and Port Botany; and
- It will unlock the Cooks River foreshore through the future embellishment of new publicly accessible open space, improving active transport connections within the local area.

8.0 Conclusion

In conclusion, this EIS has been prepared on behalf of Stockland (the Applicant) to inform the community and stakeholders about the Proposal, including its social, economic and environmental impacts. It has been prepared in accordance with the relevant requirements of the EP&A Act, EP&A Regulation and SEARs.

The Proposal is the result of a previous Planning Proposal (PP-2022-1748) that sought to deliver refreshed planning controls which prioritised land uses to support the adjacent Sydney Airport, as one of Australia's most important trade gateways. The proposed amendments to the Bayside LEP 2021 were gazetted on 9 May 2025, supported by VPAs for the future delivery of public benefits including external public road upgrades and new publicly accessible open space.

The Applicant seeks consent under 'Division 4.7 – Stage Significant Development' of the EP&A Act for a Concept Masterplan and Early Works associated with the Kogarah Golf Club Redevelopment located on land identified as 13-19A Marsh Street, Arncliffe. It supports the vision for the Kogarah Golf Club Redevelopment to create a world-class precinct that leverages the site's strategic location adjacent to Sydney Airport and strong transport connections by delivering multi-level logistics development, trade-related enterprise and supporting uses with publicly accessible open space.

Having regard to environmental, economic, and social considerations, the Proposal is justified for the following reasons:

- It is consistent with the Bayside LEP 2021, with exception of the proposed variation to the Height of Buildings development standard which is justified as being unreasonable or unnecessary in the circumstances and supported by sufficient environmental planning grounds under a Clause 4.6 Variation Request;
- It meets the statutory requirements of other EPIs, including applicable State Environmental Planning Policies;
- It is consistent with the objects of the EP&A Act, specifically promoting the orderly and economic development of land by enabling new logistics and trade-related enterprise floorspace on land with demonstrated capacity directly adjacent to Sydney Airport;
- It is consistent with the strategic planning framework and previous Planning Proposal (PP-2022-1748) outcomes through the provision of new publicly accessible open space and land uses that support the growth of Sydney Airport, as one of Australia's most important trade and economic gateways;
- It enables the delivery of public benefits secured under separate executed VPAs with Council and TfNSW, including new publicly accessible open space;
- It supports the future delivery of Pemulwuy Park by Bayside Council, comprising 14-hectares of new public open space that will connect to the associated Cooks River foreshore link;
- It facilitates the future delivery of a new publicly accessible link along the Cooks River foreshore, extending the 'Bay to Bay' cycle link, delivering passive and active recreational uses, and high amenity to the community;
- It is supported by Indicative Reference Schemes which demonstrate suitable built form and urban design outcomes within the proposed building envelopes, supported by Urban Design Guidelines to guide future development;
- It has demonstrated the ability to incorporate proposed land use flexibility, enabling the future development to align with changing market conditions and the highest and best use over the life of the project;
- It results in minor/moderate overshadowing to the future Pemulwuy Park in mid-winter as a result of the proposed height variation, to be minimised through the design of future buildings (subject to future DAs);
- It results in acceptable visual and view impact, to be effectively mitigated through incorporation of built form measures in the design of future buildings (subject to future DAs);
- It demonstrates that airport safeguarding can be suitably achieved and a 'controlled activity' approval may be issued;
- It confirms that the predicted traffic generation and impacts associated with the Concept Masterplan are consistent with the traffic generation and impacts associated with the previous Planning Proposal (PP-2022-1748) and associated VPAs for external public road upgrades;
- It is supported by a BDAR which assesses and offsets the biodiversity impacts associated with redevelopment of the previous Kogarah Golf Club site (vacated in March 2025);
- It will not result in other adverse environmental impacts, with suitable mitigation measures to be adopted throughout the design and delivery of the project that will minimise any identified impacts;

- It responds to the limited industrial land supply in Eastern Sydney by delivering more intensive and efficient development on a site with demonstrated capacity, subsequently supporting the projected population growth in Eastern Sydney and predicted growth of freight volumes processed at Sydney Airport and Port Botany;
- It reduces the reliance on distribution centres in Western Sydney to process freight ultimately bound for Eastern Sydney where homes and jobs are most concentrated, supporting reduced vehicle trips on the regional road network and reduced travel distances;
- It directly supports the projected growth of Sydney Airport, including forecasted growth in air freight processed from 0.6 million tonnes in 2024 to 1.4 million tonnes in 2045;
- It will have significant economic benefits to the NSW economy, supporting between 1,750 to 2,890 direct ongoing full-time jobs and between \$470 million and \$630 million in direct value-add each year once fully occupied; and
- It is suitable for the Site and in the public interest.

For the reasons above, the SSDA is considered supportable and appropriate for approval.



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