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NSW Department of Planning & Environment
23-33 Bridge Street
Sydney NSW 2000

Attention: Kate MacDonald

Section 96(2) Modification Application (SSD 6078) – Oakdale Central, Horsley Park (Lot 21 in Deposited Plan 1173181)

Dear Kate,

This application is submitted to the NSW Department of Planning & Environment (NSW DP&E) on behalf of Goodman Property Services (Aust) Pty Ltd and relates specifically to warehouse 2B within the Oakdale Central Estate, Horsley Park.

Approval to State Significant Development (SSD 6078) was granted by the Minister for Planning on 18 March 2015 for the staged construction of three (3) warehouse and distribution facilities pertaining to Lots 1C, 2B and 3 and the upgrade of Old Wallgrove Road. Due to tenant specific requirements, design changes are now required to the approved facility on Lot 2B in order to accommodate their operational needs.

This application represents the second modification to SSD 6078.

The amendments sought have been assessed against the key Environmental Assessment Requirements throughout this report.

Attached to this submission are the following specialist reports and plans:

- **Appendix 1 - Architectural Plans**
- **Appendix 2 - Civil Engineering Drawings and Design Report**
- **Appendix 3 - Landscape Plans**
- **Appendix 4 - Traffic Impact Assessment**
- **Appendix 5 - Noise Impact Assessment**
- **Appendix 6 - Fire Safety Strategy**
- **Appendix 7 - Building Code of Australia Report**
- **Appendix 8 - Preliminary Hazard Analysis**

Should you require further information, please contact the undersigned.

Yours faithfully,

A handwritten signature in blue ink, appearing to read "Andrew Cowan".

Andrew Cowan
Senior Associate
McKenzie Group Consulting Planning (NSW) Pty Ltd
ACN 146 035 707

1. OAKDALE CENTRAL ESTATE - OVERVIEW

Consent was granted to State Significant Development 6078 on 18 March 2015 for the staged construction of three (3) warehouse and distribution facilities and the upgrade of Old Wallgrove Road.

Concept Approval was granted to MP08_0065 on 2 January 2009 for the establishment of Oakdale Central Estate including subdivision, earthworks, internal road layout, recreation and biodiversity land, seven industrial buildings, pad levels, external upgrades and infrastructure. A concurrent Stage 1 Project Application was also granted for the establishment of a DHL Logistics Hub and associated infrastructure which comprises 3 buildings being those on lots 1A and 2A (MP08_0066). Subsequent to the Concept and Project Approval, a number of modifications were carried out pursuant to Section 75W of the *Environmental Planning & Assessment Act 1979*.

Table 1 – Previous 75W Modification Applications - Oakdale Central

Modification No.	Date of Approval	Description
Mod 1 to Concept Plan and Project Approval	4 November 2010	Amendment of Concept Plan subdivision to change configuration and reduce the number of internal estate roads. The Project Approval was also amended so that stage 1 on lots 1A and 2A with two warehouse buildings on lot 2A being proposed in lieu of one larger building.
Mod 2 to Project Approval	17 February 2011	Due to the timing of notification of the Voluntary Planning Agreement (VPA) between the Minister for Planning, Goodman and the land Trustee for contributions towards regional transport infrastructure and services for lot 1A and 2A, entry into the VPA was amended prior to issue of occupation or subdivision certificate. The VPA was entered into on 25 March 2011 and has been amended to include the subject estate allotments, lots 1C, 2B and 3 so that it applies to the whole estate.
Mod 3 to Project Approval	8 July 2011	Minor amendments to warehouses 2 and 3 on lot 2A including changes to the appearance of the warehouses, site layout and quantum of floor space.
Mod 4 to Project Approval	20 September 2012	Modification of the Project Approval to re-orient and reposition the warehouse to be constructed on lot 1A, this involved rotating the building to 180 degrees and siting it in a similar position to that originally approved.
Mod 2 to concept plan and Mod 5 to Project Approval	5 March 2013	Modification of subdivision layout, shape and location of the estate stormwater basin, bulk earthworks, pad levels, staging and the importation of fill.
Mod 6 to Project Approval	10 May 2013	Relocation of the swing and sliding gates at the truck entry, increase of office floor space within the approved building footprint and provision of storage and workshop areas within the approved building footprint.
Mod 7 to Project Approval	Withdrawn	
Mod 8 to Project Approval	15 May 2014	Amendment to condition 18 of the Project Approval to allow Excavated Natural Material to be imported to the site.
Mod 3 to Concept Plan	18 March 2015	Amendment to subdivision plan to consolidate lots 3A/3B; Inclusion of a vehicle turning head within Oakdale South and inclusion of the detention basins within the biodiversity lots to enable physical use for on-site detention purposes.

Review of the Concept Plan indicates that there is nothing which prevents the proposed modification from proceeding.

In addition to the above, it is noted that the bulk earthworks of estate allotments 1C, 2B and 3 were subject to separate approval from Fairfield City Council.

The Voluntary Planning Agreement entered into between the Minister for Planning, Goodman Property Services (Aust) Pty Ltd, BGAI 6 Pty Ltd, BGMG 8 Pty Ltd and BGAI 2 Limited was executed on 12 March 2015 and deals specifically with the upgrade of Old Wallgrove Road.

2. PROPOSED MODIFICATIONS

The modifications sought to the approved facility on Lot 2B are listed below:

- Building Area reduced from 33,025sqm to 31,080sqm.
- Building changes to a temperature controlled facility.
- Dangerous Goods (DGs) store added.
- Warehouse roller shutter locations adjusted.
- Warehouse racking revised.
- Electrical Kiosk substation added.
- Motorcycle parking added.
- Chiller Room added.
- MSB Room added to Outdoor Area.
- Underground water rainwater tank added to car park.
- Retaining walls and stair added to landscaped area in car park.
- Plant Room for Truck Wash added.
- Rainwater tank for truck wash added.
- Office replanned and relocated to centre of building.
- Total parking increased to 200 spaces, provisional spaces deleted.
- Sprinkler tank and pump room relocated.

The approved and modified scheme for warehouse 2B is provided in the below figures.

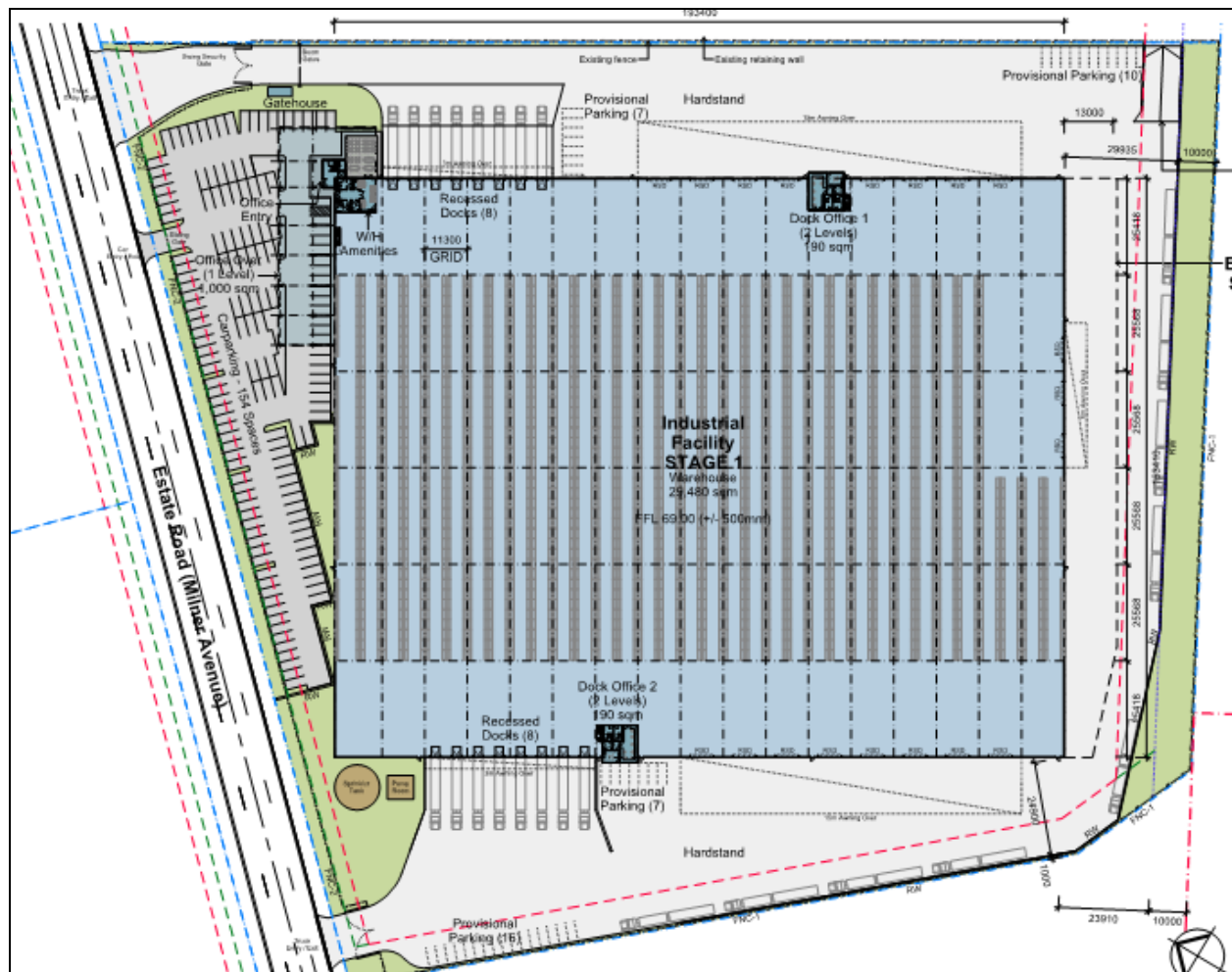


Figure 1: Approved Layout – Lot 2B

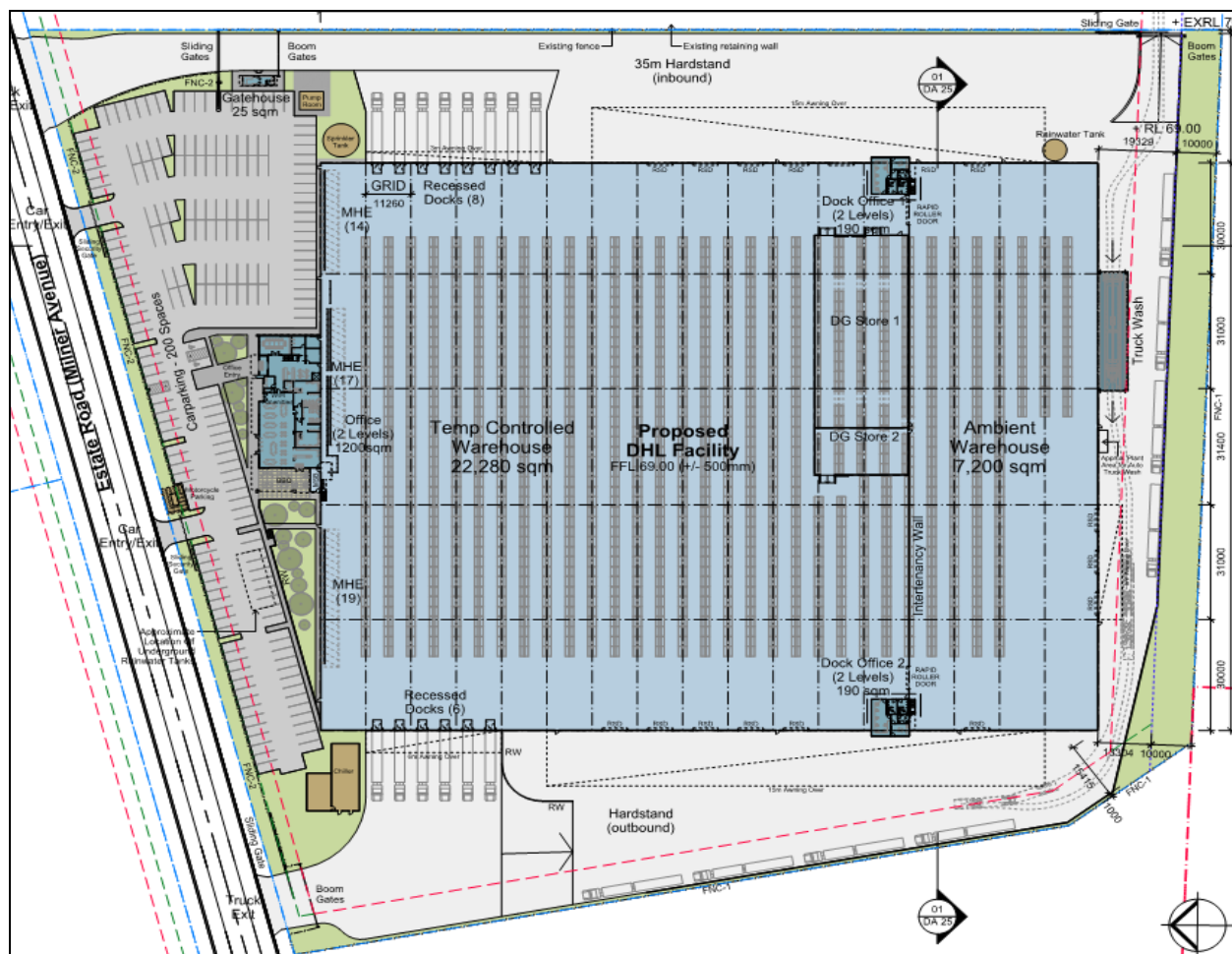


Figure 2: Proposed Layout – Lot 2B

To address the proposed storage of Dangerous Goods (DGs) within the facility, the following conditions are proposed. Note: these have been adapted from the approved facility under **SSD13-5746**. The amendments in red and bold indicate the preferred wording as this will mitigate time constraints for the development.

HAZARDS AND RISK

Pre-construction

C1.

At least one month prior to the commencement of construction of the ~~development~~ **Dangerous Goods Store** (except for construction of those preliminary works that are outside the scope of the hazard studies), or within such further period as the Director-General may agree, the Applicant shall prepare and submit ~~for the approval of~~ **to the Secretary-General** the studies set out under subsections (a) to (b) (the pre-construction studies). ~~Construction, other than of preliminary works, shall not commence until approval has been given by the Director-General and, with respect to the Fire Safety Study, approval has also been given by the Commissioner of the NSW Fire Brigades.~~

(a) Fire Safety Study

A Fire Safety Study for development. This study shall cover the relevant aspects of the Department of Planning's Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study Guidelines' and the New South Wales Government's 'Best Practice Guidelines for Contaminated Water Retention and Treatment Systems'. The study shall also be submitted for approval, to the NSW Fire Brigades.

- (b) *Final Hazard Analysis A Final Hazard Analysis of the development prepared in accordance with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 6, 'Guidelines for Hazard Analysis'.*

Note: For the purposes of Condition C1, 'Preliminary works' includes the construction, fit out and use of the expanded facility, but excludes the use of the dangerous goods area, which is not permitted to be used until the relevant approvals from the Director-General and the Commissioner of the NSW Fire Brigades have been obtained.

Pre-commissioning

C2.

*The Applicant shall develop and implement the plans and systems set out under subsections (a) to (b). ~~No later than two months prior to the commencement of commissioning of the development, or within such further period as the Director-General may agree,~~ **Prior to issue of the Final Occupation Certificate** the Applicant shall submit for the approval of the Director-General documentation describing those plans and systems. **Commissioning Operations of the Dangerous Goods Store** shall not commence until approval has been given by the Director-General.*

(a) Emergency Plan

The company's Emergency Plan and detailed emergency procedures shall be updated to incorporate any changes due to the development. The plan shall include detailed procedures for the safety of all people outside of the development who may be at risk from the development. The plan shall be in accordance with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 1, 'Industry Emergency Planning Guidelines'.

(b) Safety Management System

The company's Safety Management System shall be updated to include any changes due to the development. The document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to the procedures. Records shall be kept on-site and shall be available for inspection by the Director-General upon request. The Safety Management System shall be developed in accordance with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management'.

~~Pre-startup~~

~~C3.~~

~~Pre-Startup Compliance Report—One month prior to the commencement of operation of the development, the Applicant shall submit to the Director-General, a report detailing compliance with Conditions C1 and C2, including:~~

- ~~(a) dates of study/plan/system submission, approval, commencement of construction and commissioning;~~*
- ~~(b) actions taken or proposed, to implement recommendations made in the studies/plans/systems; and~~*
- ~~(c) responses to each requirement imposed by the Director-General under Condition C6.~~*

~~Post-startup~~

~~C4.~~

~~Post-Startup Compliance Report—Three months after the commencement of operation of the development, the Applicant shall submit to the Director-General, a report verifying that:~~

- ~~(a) the Emergency Plan required under Condition C2(a) is effectively in place and that at least one emergency exercise has been conducted; and~~*
- ~~(b) the Safety Management System required under Condition C2(b) has been fully implemented and that records required by the system are being kept.~~*

Ongoing

C5. Hazard Audit

~~Twelve months after the commencement of operations of the development and every three years thereafter, or at such intervals as the Director General may agree, the Applicant shall carry out a comprehensive Hazard Audit of the development and within one month of each audit submit a report to the Director General for approval. The audits shall be carried out at the Applicant's expense by a qualified person or team, independent of the development, approved by the Director General prior to commencement of each audit. Hazard Audits shall be consistent with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 5, 'Hazard Audit Guidelines'. The audit report must be accompanied by a program for the implementation of all recommendations made in the audit report. If the Applicant intends to defer the implementation of a recommendation, reasons must be documented.~~

3. ENVIRONMENTAL ASSESSMENT

Director Generals Requirements were issued on 4 October 2013 for the construction of 3 warehouse and distribution facilities. The key Environmental Assessment requirements as they relate to the modified proposal for Lot 2B are addressed below.

3.1 Traffic and Transport

An Addendum Traffic Impact Assessment (TIA) prepared by Ason Group (**Appendix 4**) has been undertaken to identify the traffic and parking implications of the proposal in the context of existing conditions, prior approvals and anticipated development. The findings of the Assessment are summarised in the following sections:

Parking Requirements

As the application seeks to reduce the floor area of the facility, the required provision of parking is reduced from that of the previously approved scheme from 194 to 200 spaces. Car parking for the proposed development has been calculated based on the Concept Plan requirements which are:

- 1 space per 200sqm GFA (warehouse)
- 1 space per 40sqm (office)

The breakdown of spaces according to warehouse and office space is provided below:

Lot 2B	Warehouse	29,480	1 space per 200m ²	147	
	Office	1,600	1 space per 40m ²	40	
	Total Parking for Lot 2B			187	200

The proposal is compliant with the Concept Plan and will result in a minor intensification of the traffic volumes generated.

Access and Internal Design

This modification seeks to amend the internal design layout to provide for optimal functionality for the end user.

The following aspects of the design have been considered in this respect:

- The proposed car park accesses have been designed with a clear width of 6.0m, which complies with the minimum requirements of AS2890.1.
- The main car park aisle has been designed with a minimum clear width of 6.4m, which exceeds the requirements for a User Class 1A.
- All staff and visitor parking spaces are designed in with a minimum space length of 5.4m and minimum width of 2.6m thereby exceeding the requirements of AS2890.1 for a User Class 1A.

- *Disabled parking spaces are designed in accordance with AS2890.6.*
- *The internal design of the service area has been undertaken in accordance with the requirements of AS2890.2 for the maximum length vehicle accessing each dock.*
- *A minimum clear head height of 4.5m is provided within all areas traversed by service vehicles.*
- *A minimum bay width of 3.5m is provided for all service bays, and*
- *Swept path analysis has been undertaken as permissible under AS2890.2 and confirms the internal design and each unit is capable of accommodating vehicles up to and including 26m B-Doubles.*

In addition to the above, a swept path analysis has been prepared which demonstrates compliance with AS2890.1 and AS2890.2 (refer **Appendix 4**).

3.2 Soil and Water

AT&L have prepared detailed engineering plans and an accompanying report for the proposed development (as modified). The stormwater management outcomes are to remain generally consistent with that of the approved scheme under SSD 6078 (refer to Civil Design Report and Drawings at **Appendix 2**)

All stormwater runoff from Lot 2B will drain via the road stormwater network into the Bio-diversity Lot B which will be used for on-site detention purposes. It is noted that use this allotment for that purpose has been addressed under Modification 3 (MOD 3) to Concept Plan MP08_0065.

The OSD design within the basin has generally been designed to achieve the following outcomes:

- OSD = 250m³/Ha equating to minimum combined OSD volume of 4,939m³.
- Post developed peak flows to be mitigated to pre-developed peak flows for all storm events between and including the 5 and 100 year events.

Based on the minor nature of the amended scheme, it is considered the proposal will achieve satisfactory stormwater management outcomes.

Erosion and sediment control measures will be carried out consistent with those that were considered under SSD 6078.

3.3 Biodiversity

The amended design of warehouse 2B shall not result in any encroachment on the biodiversity lots within the estate. Sufficient landscaping will be provided, that is generally consistent with the approved scheme, thus ensuring sufficient onsite planting and pervious areas.

Revised Landscape Plans prepared by Site Image are annexed at **Appendix 3**.

3.4 Noise

Construction Noise

The construction noise generated will not differ from that considered under SSD 6078. The recommendations as provided in the SLR Report dated October 2013 will be adhered to along with the Management and Mitigation Measures that have been committed to by Goodman.

Operational Noise Emissions

The operational noise emissions have been considered in respect of the modified proposal, noting that change in noise levels associated with the proposal are ± 1 dB. Compliance is therefore achieved with the relevant noise assessment criteria in accordance with the Industrial Noise Policy.

An addendum Noise Impact Assessment has been prepared by SLR that confirms compliance in this respect (**Appendix 5**).

3.5 Air Quality and Odour

Construction & Operational Phase Impacts

All air quality impacts will be mitigated as outlined in the SLR Report submitted with SSD 6078 and the Management and Mitigation Measures committed to be Goodman. The amendments sought under the subject application do not warrant further consideration in this respect.

3.6 Heritage

The amended design will not result in any adverse impact in respect of heritage. All impacts in this respect have been sufficiently addressed as part of SSD 6078 and the preceding Concept Pal for the estate.

3.7 Visual

As noted in Section 2 of this Report, the proposal entails the following design amendments that will result in a material visual change:

- Building Area reduced from 33,025sqm to 31,080sqm.
- Building changes to a temperature controlled facility.
- DG store added.
- Warehouse roller shutter locations adjusted.
- Warehouse racking revised
- Electrical Kiosk substation added. Parking adjusted accordingly. Motorcycle parking added.
- Chiller Room added
- MSB Room added to Outdoor Area
- Underground water rainwater tank added to carpark.
- Retaining walls and stair added to landscaped area in carpark.
- Plant Room for Truck Wash added.
- Rainwater tank for truck wash added.
- Office replanned and relocated to centre of building.
- Carpark revised. Total parking increased to 200 spaces, provisional spaces deleted.
- Sprinkler tank and pump room relocated.

It is considered that the extent of changes proposed will not adversely affect the interface with the surrounding lands, or the aesthetic value of the within the streetscape as viewed from Milner Avenue.

The materials and colour scheme will be generally consistent with the approved scheme under SSD 6078.

3.8 Waste Management

The findings and recommendations of the Waste Management Plan prepared by SLR that was submitted with SSD 6078 remain unchanged for the subject proposal.

3.9 Fire Safety and Building Code of Australia

A revised Fire Safety Strategy prepared by Rawfire (**Appendix 6**) and Building Code of Australia Report by Blackett Maguire + Goldsmith (**Appendix 7**) have been included as part of this modification application.

The findings and recommendations of this report conclude that the modified proposal is generally consistent with SSD 6078 and include Deemed to Satisfy provisions (DTS) and Performance Requirements. Notwithstanding, further details demonstrating compliance are to be submitted as part of the Construction Certificate.

4. LEGISLATIVE FRAMEWORK

4.1 Environmental Planning & Assessment Act 1979

Section 96 of the Environmental Planning & Assessment Act 1979 makes provision to modify a Development Application that has been made pursuant to Part 4 of the *Environmental Planning & Assessment Act 1979*. The proposal as submitted to DP&E is considered to satisfy the provisions of Section 96(2) of the Act in that the changes proposed will result in the development being substantially the same as that for which consent was originally granted.

The key provisions of Section 96(2) of the Act have been considered below:

A consent authority may, on application being made by the applicant or any other person entitled to act on a consent granted by the consent authority and subject to and in accordance with the regulations, modify the consent if:

- (a) it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which consent was originally granted and before that consent as originally granted was modified (if at all)*

Comment: The modified design of facility 2B incorporates minor material changes to the form, including the provision of a Dangerous Goods Store. As approved under SSD 6078, the primary land use will be retained for warehousing and distribution purposes.

The ultimate layout and function of the site is also considered to be consistent with that approved under SSD 6078 and the Concept Plan for the estate. Traffic generation for the site is consistent with that modelled under SSD 6078 with the surrounding road network capable of accommodating the proposal.

4.2 State Environmental Planning Policy (Western Sydney Employment Area) 2009

The proposed development (as modified) will provide employment generating activities within WSEA consistent with the underlying objectives of the Plan. The Principal Development Standards and miscellaneous provisions prescribed under the SEPP are addressed below in respect of the proposed modifications to warehouse 2B.

Height of Buildings

The building height of the approved facility is to remain unchanged from SSD 6078.

Design Principles

The design changes sought to the approved facility are minor in respect of the previous scheme and will remain consistent with the objectives of the clause.

Preservation of trees and vegetation

No trees are proposed to be removed under the subject modification application.

4.3 State Environmental Planning Policy (Infrastructure) 2007

As the proposal seeks to reduce the GFA, referral to RMS is not required. The conditional requirements provided under SSD 6078 are able to be complied with.

4.4 State Environmental Planning Policy No.33 – Hazardous and Offensive Development

State Environmental Planning Policy No. 33 – Hazardous and Offensive Development (SEPP 33) provides definitions for hazardous and offensive development as well as potentially hazardous and offensive development and outlines the items that a consent authority must consider to assess whether the development is hazardous or offensive.

The aims of SEPP 33 are:

- (a) to amend the definitions of hazardous and offensive industries where used in environmental planning instruments, and
- (b) to render ineffective a provision of any environmental planning instrument that prohibits development for the purpose of a storage facility on the ground that the facility is hazardous or offensive if it is not a hazardous or offensive storage establishment as defined in this Policy, and
- (c) to require development consent for hazardous or offensive development proposed to be carried out in the Western Division, and
- (d) to ensure that in determining whether a development is a hazardous or offensive industry, any measures proposed to be employed to reduce the impact of the development are taken into account, and
- (e) to ensure that in considering any application to carry out potentially hazardous or offensive development, the consent authority has sufficient information to assess whether the development is hazardous or offensive and to impose conditions to reduce or minimise any adverse impact, and
- (f) to require the advertising of applications to carry out any such development.

Clause 3 of SEPP 33 states:

potentially hazardous industry means a development for the purposes of any industry which, if the development were to operate without employing any measures (including, for example, isolation from existing or likely future development on other land) to reduce or minimise its impact in the locality or on the existing or likely future development on other land, would pose a significant risk in relation to the locality:

- (a) to human health, life or property, or
- (b) to the biophysical environment,

The proposal (as modified) seeks to introduce a new Dangerous Goods (DGs) store within facility 2B which proposes to store DGs that will exceed the thresholds under SEPP 33, thus requiring the preparation of a Preliminary Hazards Analysis to demonstrate that the site is not hazardous.

The larger DG store (DGS1) will contain Class 2.1 and 2.3 DGs while DG store 2 (DGS2) will contain Class 5.1, 8 and 9 DGs.

The methodology adopted for the PHA prepared has adopted the following approach:

Hazard Analysis - A Hazard Identification Table was formulated to identify potentially hazardous scenarios. These scenarios include:

- Flammable Liquid Spill or Gas Release, Delayed Ignition and Flash Fire or Explosion
- Flammable Liquid Spill, Ignition and Racking Fire
- LPG Release (from Aerosol), Ignition and Racking Fire
- Forklift Loading/Unloading, Damaged Packaged, Flammable Release, Ignition and Pallet Fire
- Full Warehouse Fire
- Dangerous Goods Liquid Spill, Release and Environmental Incident
- Warehouse Fire, Sprinkler Activation and Potentially Contaminated Water Release

Consequence Analysis - Four of the above incidents were identified to have potential impact off-site including:

- Flammable liquid spill, ignition and racking fire;
- LPG release (from aerosol), ignition and racking fire; and
- Forklift loading/unloading, damaged packaged, flammable release, ignition and pallet fire;

Analysis of the above scenarios concluded that the radiant heat impacts at 4.7 kW/m² are contained within the site boundary and would not pose a fatality risk at the site boundary; hence, this incident was not carried forward for further analysis.

- Full warehouse fire and toxic smoke emission.

If a fire occurs within the DG store and the sprinkler systems fail to activate, the fire will spread throughout the warehouse and is unlikely to be contained and would likely consume the entire warehouse.

Frequency Analysis and Risk Assessment - The frequency analysis and risk assessment showed that the full warehouse fire would have a fatality risk of 3.53 chances per million per year (pmpp) at the site boundary, with lesser risk at further distances from the boundary. HIPAP No. 4 publishes acceptable risk criteria at the site boundary of 50 pmpp (for industrial sites). Therefore, the probability of a fatality from a full warehouse fire at the site boundary is within the acceptable risk criteria

Based on the analysis conducted, it is concluded that the risks at the site boundary are not considered to exceed the acceptable risk criteria; hence, the facility would only be classified as potentially hazardous and would be permitted within the current land zoning for the site.

4.5 State Environmental Planning Policy No.55 – Remediation of Contaminated Land

Contamination of the site has previously been dealt with under the Concept Plan and subsequent application for earthworks. No further consideration is required as part of this Modification Application.

4.6 Fairfield Local Environmental Plan 2013

As the site is located within the WSEA, the provisions of *Fairfield Local Environmental Plan 2013* do not apply.

4.7 Fairfield City Wide Development Control Plan 2013

It is noted that Section 11 of *State Environmental Planning Policy (State and Regional Development) 2011* states:

11 Exclusion of application of development control plans

Development control plans (whether made before or after the commencement of this Policy) do not apply to:

(a) State significant development

Furthermore, the Concept Plan approval sets the specific controls for the estate in terms of building setbacks, site coverage and parking provision. Nothing in the modified proposal results in inconsistencies with this plan.

4.8 Oakdale Central Concept Plan

The following controls apply to the estate as approved under the Concept Plan.

Table 2 – Oakdale Central Controls			
Control	Provision	Compliance	Comment
Lot Dimensions	<ul style="list-style-type: none"> - Min lot area 5,000m² - Min built area 2,500m² 	Yes	Complies
		Yes	Complies
Site Coverage	<ul style="list-style-type: none"> - Max 65% 	Lot 2B – 52%	Complies
Building Setbacks	<ul style="list-style-type: none"> - 20m link road - 15m collector road - 7.5m estate road - 5m rear setbacks (2.5m landscaping) 	<i>Estate Road</i> 21.7m All buildings comply with the rear 5m setback and adequate landscaping is provided.	The proposed warehouses comply with the required setbacks to the estate roads
Car Parking Provision	<ul style="list-style-type: none"> - Warehouse 1 per 200sqm - Office 1 per 40sqm 	All Lots comply - Refer to addendum Traffic Impact Assessment (Appendix 2).	

5. CONCLUSION

The subject modification application seeks consent for minor amendments to the approved facility located on Lot 2B and will not result in any unacceptable environmental impacts on the surrounding environment. As detailed throughout this report, the changes sought will result in the development been substantially the same as that for which consent was originally granted.

Overall, the modified scheme will provide for a more suitable layout that responds to the requirements of the future tenant resulting in increased efficiencies for the site. The proposal does not result in intensification of the site or any variation to the primary land use.

The employment generating potential of the site will be retained, consistent with the objectives of the SEPP WSEA 2009.

Accordingly, it is requested that DP&E support the application.

Appendix 1

Architectural Plans

Appendix 2

Civil Engineering Drawings and Design Report

Appendix 3

Landscape Plans

Appendix 4

Traffic Impact Assessment

Appendix 5

Noise Impact Assessment

Appendix 6

Fires Safety Strategy

Appendix 7

Building Code of Australia Report

Appendix 8

Preliminary Hazard Analysis