

Proposed Warehouse and Distribution Facility 2 Hume Highway, Chullora

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PART A PRELIMINARY

1.1 INTRODUCTION

This scoping document has been prepared by McKenzie Group Consulting Planning (NSW) Pty Ltd on behalf of Commercial & Industrial Property Pty Ltd and is submitted to the NSW Department of Planning and Environment (DP&E) in support of a formal request for Secretary's Environmental Assessment Requirements (SEARs).

This request for SEARs is made in relation to a proposed Warehouse and Distribution Facility located at 2 Hume Highway, Chullora. The proposed facility will comprise a Gross Floor Area of approximately 56,800m², for which it will be utilised by a single tenant.

As the site is located at the interface of the Bankstown and Strathfield Local Government Area, the proposal is subject to the provisions of *Bankstown Local Environmental Plan 2015* (BLEP) and *Strathfield Local Government Plan 2012* (SLEP). The site maintains the same land use zone across both local government areas being the IN1 – General Industrial Zone. The proposal is permissible within the zone, subject to consent.

The proposal satisfies the definition of State Significant Development pursuant to Schedule 1 Clause 12 of *State Environmental Planning Policy (State and Regional Development) 2011* as the Capital Investment Value exceeds \$50 Million.

This document provides a brief overview of the proposal and the planning framework that applies to enable the issue of the SEARs that will guide the preparation of a formal Environmental Impact Statement (EIS) for future development of the land.

Environmental considerations relevant to the proposal have been identified to include:

- Soil and water;
- Air quality;
- Noise;
- Flora and fauna;
- Aboriginal and historical heritage;
- Traffic and transport; and
- Visual amenity and site design.

The proposal promotes development of the locality, providing employment opportunities and contributes to the growth of industrial development in a sustainable manner.

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PART B SITE ANALYSIS

2.1 SITE LOCATION & EXISTING CHARACTERISTICS

The subject site is identified as 2 Hume Highway, Chullora (Lot 12 in DP834734) and affords an area of 10.28 hectares. The current use of the site is a Fairfax Media Limited Newspaper Printing and Distribution facility. The existing structures were approved under Development Consent DA93/17 and subsequent changes made to the built form pursuant to Section 96 of the *Environmental Planning and Assessment Act 1979*.

Existing attributes of the site are noted as follows:

- A stormwater basin is located adjacent to the Hume Highway frontage of the site.
- The dominant vegetation on the site has been plated and manicured. No native vegetation communities were recorded but there are substantial trees and vegetation located in the building curtilage and throughout existing car parking areas;
- In total, the existing warehouse comprises 20,275m² Gross Floor Area;
- Vehicle access is via Worth Street for trucks and staff;
- Two (2) car parking areas both located between the building and the north east frontage to Worth Street;
- Service vehicle articulation areas;

All uses located north/west of the Hume Highway surrounding the subject site are of a similar industrial scale and comprise a number of warehouse facilities used for manufacturing, warehousing and distribution. Land uses located on the opposite side of the Hume Highway include car dealerships, motel, fuel station and some urban residential development.

Figure 1 below provides an overview of the site layout (as existing) and the surrounding development.



Figure 1: Subject Site (Six Maps, 2015)

2.2 SITE/STRATEGIC CONTEXT

The site forms part of The West Central Industrial Belt, stretching from Chullora to Smithfield, which is identified as an area that will continue to contribute to future economic success of the West Central Subregion.

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The site is located within the portion of the West Central Industrial Belt, described within the Draft Bankstown North Central Local Area Plan as the Employment Lands Precinct. The precinct includes over 245ha comprising of the Chullora Technology Park, Potts Hill business Park and Chullora Industrial Precinct.

The site is specifically included within the area described as the Chullora Technology Park as outlined in **Figure 2** below. The Technology Park provides over 12% of the total employment across the City of Bankstown and is described as 'the hub for printing manufacturing, transport, retail/wholesale trade, education and training'.

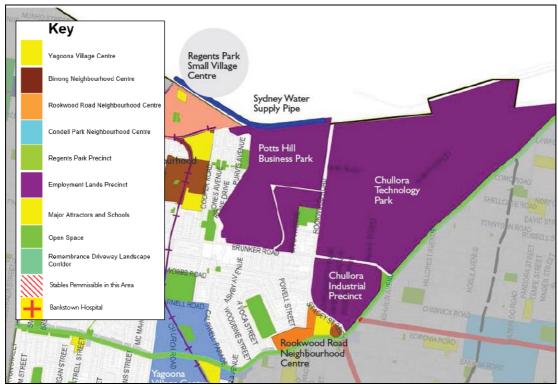


Figure 2: Key Characteristics of the North Central Local Area Map

The site contains existing industrial buildings indicative of the use of the site for Newspaper Printing and Distribution facilities. These premises were previously owned and operated by Fairfax Media Limited. The presence of the site in relation to the surrounding transport corridors provides a logical and highly accessible site for warehouse and distribution facilities.

The existing structures on the site were approved in 1993 and have been constructed for the specific operations of Fairfax Media Limited. The existing buildings utilise only a portion of the site, resulting in the inefficient use of fully serviced employment lands, designated for industrial uses that afford direct connectivity to the Hume Highway.

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PART C PROJECT SUMMARY

3.1 AIMS AND OBJECTIVES OF THE PROPOSAL

The following objectives have been identified as forming the basis of the proposed development of the subject land to accommodate a future Warehouse and Distribution Facility.

- Design the Site to achieve viable economic return;
- Ensure minimal environmental and amenity impact;
- Provide for employment generating land uses; and
- Ensure development is compatible with surrounding development and the local context.

The site and proposed design are considered to meet the objectives of the project as it allows for development on land that has been previously disturbed and utilised for industrial uses.

3.2 DESCRIPTION OF THE PROPOSAL

Consent is sought to develop the site for the purpose of a Warehouse and Distribution Facility. Use of the facility will be for warehousing and distribution on a 24 hour, 7 day basis, consistent with surrounding operations.

The proposed development particulars are outlined as follows:

Table 1: Proposed Development Particulars							
Project Element	Warehouse GFA	Bulk building GFA	Office GFA	Raised Pedestrian Walkway GFA	Gate house GFA	Canopy Link GFA	Total GFA
Structures	32,800m ²	6,500m ²	3,500m ²	170m ²	30m ²	13,800m ²	56,800m ²
Internal parks and road	Construction of internal vehicle articulation areas and car parking to service the proposed facility which will be designed in accordance with Australian Standards to accommodate B-Double Vehicle movements.						
Primary Land Use	Warehousing, distribution and logistics related to the operations. Hours of operation will be on a 24 hour, 7 day basis.						
Bulk Earthworks	Bulk earthworks will be required to facilitate the proposed facility and create a level building pad.						
Subdivision	No subdivision of the site is proposed						
Infrastructure and Services	The site is currently serviced by reticulated water, sewerage, electricity and gas (within the Hume Highway). It has direct vehicular access to Worth Street (B-Double) and Beaufort Place and existing drainage infrastructure.						
Operational Jobs	Approximately 300 full time equivalent jobs.						
Construction Jobs	150-200 construction related jobs will be created by the project.						

3.3 STAGING OF DEVELOPMENT

The project can be broken down into three main stages;

- Demolition and earthworks;
- Building and construction; and,
- Integrated building fit-out and commissioning.

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3.4 CAPITAL INVESTMENT VALUE

While costs have not yet been finalised, the estimated Capital Investment of this project will exceed \$50 Million. The costs will be completed once the design is finalised.

As this exceeds the \$50 Million threshold under Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011*, the proposal is deemed State Significant Development.

3.5 CONSULTATION

Consultation is currently being undertaken with the following stakeholders:

- Bankstown City Council;
- Strathfield City Council;
- NSW Roads and Maritime Service;
- NSW Office of Environmental Heritage, and;
- Sydney Trains.

Consultation with relevant stakeholders will be undertaken whilst preparing a detailed Environmental Impact Statement in keeping with the Department's Major Project Community Consultation Guidelines.

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PART D JUSTIFICATION

The intention of the proposal is to construct a new Warehouse and Distribution Facility. It is considered that the proposal:

- Is a permissible use in the IN1 General Industrial Zone;
- Redevelop the existing site to include modern facilities for a new operator that provides a more efficient use of land;
- Has appropriate access to the regional road network;
- Is compatible with surrounding development and local context;
- Will generate employment opportunities;
- Will result in minimal impact on the environment; and
- Will allow for the implementation of suitable mitigation measures where required.

The site is considered to be appropriate for the project as it allows for the use of the site for warehousing, distribution and logistics purposes in an established industrial precinct. The site design and layout of the built form seeks to maintain consistency with the objectives of the zone and enhance the underlying industrial character intended for the locality. This will be achieved by the resultant built form which reinforces the industrial nature of the land and is sensitive to the surrounding environment.

The options considered, and subsequently dismissed, in arriving to the current proposal included:

(a) 'Do Nothing' Scenario

This option was dismissed as the objectives of the project would not be met. The site currently contains facilities suitable for a Newspaper Printing and Distribution Centre. These facilities are not adaptable for future use in their current state. The existing structures on the site were originally approved in 1993. Current application of planning controls will see the site developed to create a more efficient use of existing industrial land.

(b) Development on an Alternative Site

Consideration was given to alternative sites, however these were dismissed as the subject site resulted in the most beneficial outcomes for the proposal as:

- it will be located within a site zoned for land uses such as Warehouse Distribution Centres;
- the proposal provides the opportunity to redevelop an existing industrial development to accommodate a new tenant on the site that will create employment opportunities;
- the site achieves appropriate separation from sensitive land activities including residential development;
- all potential environmental impacts of the proposal can be suitably mitigated through the design of the facility and ongoing management;
- the proximity to the regional road network provides increased economic benefits;
- The proposal generates further employment opportunities, during both the construction and the operational phase;
- the proposal will not affect any area of heritage or archaeological significance; and
- the proposal can be developed to achieve appropriate visual amenity.

The proposal is justified on the basis it is compatible with the locality in which it is proposed while having no unacceptable economic, environmental or social impact.

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PART E LEGISLATIVE AND POLICY FRAMEWORK

The following current and draft State, Regional and Local planning controls and policies have been considered in the preparation of this application:

State Planning Context

- Environmental Planning and Assessment Act 1979
- Environmental Planning & Assessment Regulation 2000
- Protection of the Environment Operations Act 1979
- Threatened Species Conservation Act 1995
- Heritage Act 1977
- NSW 2021 : A Plan to Make NSW Number One
- A Plan for Growing Sydney
- Draft West Central Subregional Strategy
- State Environmental Planning Policy (Infrastructure) 2007
- State Environmental Planning Policy No.33 Hazardous and Offensive Development
- State Environmental Planning Policy No. 55 Remediation of Land
- State Environmental Planning Policy No.64 Advertising Structures and Signage

Local Planning Context

- Bankstown Local Environmental Plan 2015
- Strathfield Local Environmental Plan 2012
- Bankstown Development Control Plan 2015
- Strathfield Development Control Plan 2005

This planning framework is considered in detail in the following sections.

5.1 ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) is the overarching governing document for all development in NSW and pursuant to Section 89D (2) provides that:

A State environmental planning policy may declare any development, or any class or description of development, to be State significant development.

The proposed development has been identified as State Significant Development under *State Environmental Planning Policy (State and Regional Development) 2011* the section 5.6 of this report.

5.2 PROTECTION OF THE ENVIRONMENT OPERATIONS ACT 1979

Schedule 1 of the *Protection of the Environment Operations Act 1979* (POEO Act) contains a core list of activities that require a licence before they may be undertaken or carried out. The definition of an 'activity' for the purposes of the POEO Act is:

"an industrial, agricultural or commercial activity or an activity of any other nature whatever (including the keeping of a substance or an animal)."

The proposal will not involve any activity that would require the issue of an Environmental Protection Licence.

5.3 THREATENED SPECIES CONSERVATION ACT 1995

The proposed estate will not require the removal of any critically endangered vegetation or habitat, thus will not trigger and thresholds under this Act.

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5.4 HERITAGE ACT 1977

No items of significance are located on the site as identified under the provisions of the *Heritage Act 1977*. Heritage item 01630 described as Sydney Water Pressure Tunnels and Shafts is located adjacent to the site. The impact of the proposal on this items will be addressed in the EIS.

5.5 NSW 2021: A PLAN TO MAKE NSW NUMBER ONE

NSW 2021 was developed by the NSW State Government to set economic, social and environmental directions for NSW. It sets targets, priorities and actions for delivery of services across the State. The strategies outlined in the Plan include:

- Rebuild the economy
- Return quality services
- Renovate infrastructure
- Strengthen our local environment and communities
- Restore accountability to government

The Chapter on Rebuilding the Economy is most relevant to the proposal as it provides objectives for achieving growth and prosperity. The plan makes a commitment that supports large and small businesses and describes the importance of the private sector's role in maintaining and creating highly productive jobs to underpin the State's ability to realise higher standards of living for all people.

The proposed development will contribute to the ongoing growth to create jobs within the Sydney Metropolitan Region as the facilities will provide vital opportunities for employment.

5.6 A PLAN FOR A GROWING SYDNEY

A Plan for a Growing Sydney was developed by the NSW Government to provide a high level planning strategy to achieve:

- A competitive economy with world-class service and transport;
- A city of housing choices with homes that meet our needs and lifestyles
- A great place to live with communities that are strong, healthy and well connected;
- A sustainable and resilient city that protects the natural environment and has a balanced approach to the use of land and resources.

The proposal represents the redevelopment of an existing industrial site, which seeks to provide a more efficient use of the land for employment generating purposes. The proposal therefore supports the strategic directions of the plan and will make a positive contribution to the Western Sydney Region.

5.7 DRAFT CENTRAL WEST SUBREGIONAL STRATEGY

The Draft West Central Subregional Strategy includes the local government areas of Auburn, Bankstown, Fairfield, Holroyd and Parramatta.

The proposed development is consistent with the Strategy in that it will:

- contribute to the development of Bankstown as a Regional City; and
- provide an appropriate use of industrial lands for industrial use and employment purposes.

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The development will also achieve the following actions under the Draft Sub-Regional Strategy:

A1.1 Provide a framework for accommodating jobs across the subregion A1.2 Plan for sufficient zoned land and infrastructure to achieve employment capacity targets in employment lands A1.5 Protects and enhance employment lands of state significance A1.6 Improve planning and delivery of employment lands A1.8 Establish a framework for the development of business parks A2.2 Strengthen industry clusters A3.2 Increase integration of employment and housing markets A3.3 Encourage emerging businesses

The proposal is considered to satisfy the above criterion by providing additional employment opportunities in the warehousing and distribution industry.

5.8 STATE ENVIRONMENTAL PLANNING POLICY (STATE AND REGIONAL DEVELOPMENT) 2011

Proposals involving activities that are listed in Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* (State and Regional Development SEPP) are identified as being State Significant Development (SSD).

Clause 12 of Schedule 1 states:

12 Warehouses or Distribution Centres

(1) Development that has a capital investment of more than \$50 million for the purpose of warehouses or distribution centres (including container storage facilities) at one location and related to the same operation.

The Capital Investment Value of the entire project is in excess of \$50 Million, thus the State Significant provisions apply. The proposal also satisfies the above threshold as it will be utilised by one tenant, for a single operation.

5.9 STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE) 2007

The referral thresholds for 'Industry' development are:

- 20,000m² or more in area with site access to any road; or
- 5,000m² or more in area where the site has access to a classified road or to a road that connects to a classified road (if access is within 90 metres of connection, measured along the alignment of the connecting road).

As the proposal seeks consent the construction of 56,800m² GFA that has access to the Hume Highway along Worth Street, referral to RMS is required. As part of the EIS, further investigation will be carried out regarding the proposed access to the site and the relationship of this access with the intersection of the Hume Highway and Worth Street.

5.10 STATE ENVIRONMENTAL PLANNING POLICY NO. 33 - HAZARDOUS AND OFFENSIVE DEVELOPMENT

The details of dangerous goods proposed to be stored on the site will be detailed as part of the finalised design. A detailed assessment in accordance with the *State Environmental Planning Policy No. 33 Hazardous and Offensive Material* will be provided as part of the EIS.

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5.11 STATE ENVIRONMENTAL PLANNING POLICY NO. 55 - REMEDIATION OF LAND

Under the provisions of *State Environmental Planning Policy No. 55 – Remediation of Land* (SEPP 55), where a development application is made concerning land that is contaminated, the consent authority must not grant consent unless:

- (a) it has considered whether the land is contaminated, and
- (b) 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, and
- (c) if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.

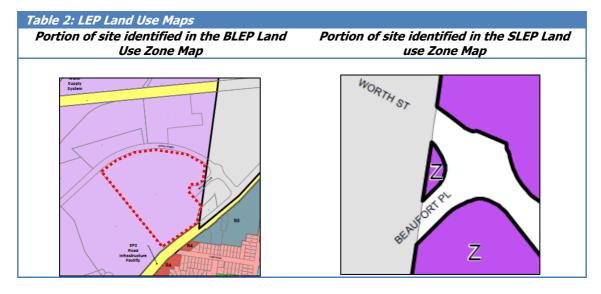
Preliminary investigations have been carried out and indicate that the site is generally suitable for industrial use. The provisions of SEPP 55 will be addressed in detail as part of any EIS submitted.

5.12 STATE ENVIRONMENTAL PLANNING POLICY NO. 64 - ADVERTISING STRUCTURES AND SIGNAGE

The State Environmental Planning Policy No. 64 – Advertising Structures and Signage (SEPP 64) applies to all signage visible from any public place. Any signage that is proposed will be addressed as part of the EIS having regard to these provisions.

5.13 BANKSTOWN LOCAL ENVIRONMENTAL PLAN 2015 AND STRATHFIELD LOCAL ENVIRONMENTAL PLAN 2012

The site is located at the interface of the Bankstown and Strathfield Council Local Government Area. A small portion of the land is identified as being subject to the controls of *Strathfield Local Environmental Plan 2012* (SLEP), with the majority of the site applicable to the controls of *Bankstown Local Environmental Plan 2015* (see **Table 2** below).



The site maintains the same land use zone across both local government areas being the IN1- General Industrial Zone. The objectives zone is provided below in **Table 3**.

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Table 3: Zone Objectives	
BLEP	SLEP
 To provide a wide range of industrial warehouse land uses. To encourage employment opportunities. To minimise any adverse effect of industry on other land uses. To support and protect industrial land for industrial uses. To enable other land uses that provide facilities or services to meet the day to day needs of workers in the area. 	 To provide a wide range of industrial warehouse land uses. To encourage employment opportunities. To minimise any adverse effect of industry on other land uses. To support and protect industrial land for industrial uses. To minimise fragmentation of valuable industrial land, and provide large sites for integrated and large floorplate activities.

In accordance with **Table 3** above, the majority of the site is subject to the controls of BLEP. These controls are detailed and addressed in **Table 4** below.

Table 4: Bankstown Local Environmental Plan		
Control		Comment
Floor Space Ratio	N – 1	Floor space ratio of the site is 1:1
Height of Buildings		No height controls are designated for the site
Lot Size	1,000m ²	The minimum lot size created from the subdivision of the allotment is 1,000m ² . Further controls are provided within Clause 4.1C (2) that details any resultant lot is required to have a width of 24m.
Heritage	A2	The site is not listed as a result of the existing built form attributes of the site but rather the potential for archaeological elements due to a section of the site's former use as Jackson's Royal Arms Inn from the late 1820's to early 1890's.
Terrestrial Biodiversity	Adjoining	The site itself does not contain any potential areas of Terrestrial Biodiversity; however allotments opposite the site on Worth Street are identified. The proposal does not result in the further fragmentation of existing habitat and areas of identified of Biodiversity value.
Preservation of trees or vegetation		Removal of specific trees on the site requires particular consideration. A full investigation into the trees required to be removed will be investigated as part of the EIS.
Flood Planning		Any proposed development on the site must have consideration to ensuring the floor heights of the use are above the flood planning level. On account the site is identified as containing risk by flooding a Flood Report prepared by a qualified engineer will need to accompany the EIS.

5.14 BANKSTOWN DEVELOPMENT CONTROL PLANNING 2015

The site is subject to the controls as identified within Part 3 Industrial Precincts in the BDCP. A brief review of the relevant controls as provided within the BDCP is summarised in **Table 5**.

Table 5: Bankstown Development Control Plan 2015			
Control	Designation	Comment	
Building	Site	70% of the site area if a single business.	
Envelopes	Coverage	60% of the site area if two or more businesses	
	Setbacks	10m to Worth Street & 3m to Beaufort Place.	

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Table 5: Banksto	own Developme	nt Control Plan 2015
Control	Designation	Comment
General	Landscaping	4.5m landscaped area along Worth Street 3m landscaped area along Beaufort Place. Landscaping to also provide some open space for the use of employee amenity; combination of grass plantings, pavement, shade and seating. Street trees to be provided for 1 tree every 5m on Worth Street. The retention of existing trees could see Council lessen this requirement.
	Parking	 1 tree per every 5 car parking spaces is required. Warehouse or distribution centres – 1 space per 300m² of GFA Other parking and access requirements exist for loading and truck parking facilities dependent on the proposed use.
Chullora Technology Park	Signs Vegetation Drainage Works	A corporate sign (giving identity to a structure of place), a directory sign (at each entrance) or a unit sign (giving business name and contact details allowed 1 per business) Plan of Management to justify the loss of any vegetation. Upgrade systems to retard flows so that peak flows from the development are no greater than pre-development conditions.

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

Notwithstanding, the provisions of the DCP will be addressed to demonstrate consistency with the objectives of the plan and desired future character of the locality.

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PART F ENVIRONMENTAL ASSESSMENT

A screening analysis of the environmental issues applicable to the proposal is presented in **Table 6** below. This risk-based analysis has been used to identify the key environmental issues for further assessment, and assist the preparation of the SEARs for the proposed development.

The analysis is based on preliminary environmental assessment of the site only. The EIS for the proposal will fully address these items and other environmental issues relevant to the proposal.

Table 6: Environmental Assessment	t Table
Issue	Analysis
Soil and water	 Preliminary investigations indicate that the site contains some minor residual contaminants; however it is suitable for commercial/industrial development. Detailed stormwater plans will be provided along with quantity and quality outcomes within the EIS.
Noise	 The site is sufficiently separated from any sensitive receivers. Any future SSD Application shall consider traffic volumes generated, operational plant and machinery and the resultant acoustic impacts having regard to the Environment Protection Authority Industrial Noise Criteria.
Air Quality	 Given the nature of the proposed development, it is not anticipated that there will be any unacceptable air quality impacts. During construction, air quality will be managed through appropriate dust mitigation measures. The quantum of emissions generated throughout the operational phase will not warrant any ongoing monitoring and mitigation.
Waste	 Operational waste will be managed in accordance with a Plan of Management for the site. Waste generated throughout the construction phase shall be disposed of in accordance with a Waste Management Plan, which makes provision for recyclables and suitable off-site disposal.
Flora and Fauna	 Tree removal to facilitate the proposed facilities will be required. The site is not identified as containing any significant environmental value. Suitable studies will be carried out to determine the significance of vegetation to be removed. Replacement planting will be provided and detailed as part of the landscape design for the site.
Aboriginal Heritage	 The development of the facility within the estate is not expected to trigger further investigation. Desktop studies will be conducted as part of the EIS to confirm this.
Historical Heritage	The site contains historical significance, as previous development consisted of the Royal Arms Inn; however due to the continued development and use of the site for industrial purposes, the likelihood of any items of significance being discovered is low.

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	 Heritage Impact Assessment will be undertaken as part of the EIS to confirm this.
Traffic & Transport	 Suitable provision is made to accommodate and service the development in terms of traffic and transport. On-site car parking is proposed to support the use of the site so as to not adversely affect the surrounding road network. The width of the new entrance/exit is also sufficient based on heavy vehicle movements for B-Doubles. Car parking is currently proposed in excess of the RMS requirements of f 1 space per 300sqm/GFA. The impact of the proposal on the intersection of Worth Street and the Hume Highway will be assessed as part of the EIS.
Other Infrastructure & Services	 All essential infrastructure is presently available to the site, including sewer, electricity and water. Suitable provision will be made for any substation or the like as part of the development should it be required.
Visual Amenity	 The built form will be designed to incorporate architectural elements that articulate the facades and provide a sufficient level of visual amenity within the public domain. Given that the site currently contains a large industrial building and is surrounded by similar scale development, the proposal will have minimum impact on the visual amenity of the locality.
Hazards	 A fully compliant dangerous goods store will be provided on site.
Site Layout and Design	 The site layout and design responds to the site constraints, thus providing a highly functional development which enhances the visual amenity of the locality. Suitable provision is made for service vehicles within the site. Detailed swept paths will be provided with the EIS and Traffic Impact Statement.

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PART G CONCLUSION

As the Capital Investment Value of the project in excess of \$50 Million, the development is defined as State Significant Development pursuant to Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011.*

The subject Site has been historically used for the purpose of Newspaper Printing and Distribution; and consequently the proposed redevelopment is considered to have minimal environmental significance.

Access is afforded to the surrounding arterial road network to provide sufficient linkages to the broader metropolitan area which supports the employment/manufacturing nature of the development.

Sufficient separation is achieved to sensitive receptors, which confirms the suitability of the site for the proposed development.

It requested that the Department issue formal SEARs for the preparation of an Environmental Impact Statement for the proposal as State Significant Development.

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APPENDIX 1

CONCEPT DEVELOPMENT PLAN & PRELIMINARY QS