

DATE

21 April 2023

CLIENT

Pet Care Distributors

PROJECT ADDRESS

339 Brolgan Road, Parkes NSW

DOCUMENT TITLE

Concept Design Statement - Subdivision of Lot 1 DP 1251595 into 2 Lots



Department of Planning  
and Environment

*Issued under the Environmental Planning and Assessment Act 1979*  
Approved Application No: DA 23/13429

Approved on: 19 December 2023

Signed: AW Sheet No: 1 of 1



Activation Precinct Certificate  
number: APC 94

Date: 31 July 2023

Issuing authority: Regional Growth  
NSW Development Corporation

Decision: Approved





**CURRAJONG**  
PLANNING, PROPERTY + PROJECT MANAGEMENT

Post

205A Clarinda Street  
Parkes NSW 2870

Web

[currajong.com.au](http://currajong.com.au)

ABN

56644651936



# DOCUMENT CONTROL

PROJECT REPORT DETAILS		
Document Title	Concept Design Statement - Pet Care Distributors Subdivision	
Principal Author	Michael Carter, Director	
Client	Pet Care Distributors	
Project Reference	APC230421	
DOCUMENT STATUS		
Issue	A	
Status	Final	
Date	21 April 2023	
DISTRIBUTION RECORD		
Recipient	Distribution Method	Date
RGDC	NSW Planning Portal	24 April 2023

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# PROJECT INTRODUCTION

## 1.1 Project Scope

This Concept Design Statement has been prepared by Currajong Pty Ltd (Currajong) on behalf of Pet Care Distributors, the landowner of Lot 1 DP 1251595, Brolgan Road, Parkes.

The statement has been prepared to support the lodgement of an application to the Regional Growth NSW Development Corporation (RGDC) for the issue of an Activation Precinct Certificate (APC) for the proposed subdivision of Lot 1 DP 1251595 into two (2) allotments.

Upon obtaining an APC from RGDC for the proposal, it is the intention of Pet Care Distributors to obtain Development Consent for the proposed subdivision.

## 1.2 Project Background

Special Activation Precincts are a NSW Government initiative aimed at stimulating economic growth and prosperity in regional NSW. The precincts bring together industry, research institutions and government inputs to create world-class economic zones.

Parkes sits at the junction of Australia's two rail spines - the Inland Railway and the Trans Australian Railway. From the Parkes Special Activation Precinct (SAP) products can reach 80% of Australia's population overnight or start their journey to overseas markets via Sydney, Melbourne, Brisbane and Freemantle seaports and airports.

Adjoining the Newell Highway and a wider network of main roads connecting to other centres in NSW, the Parkes SAP provides for a range of business opportunities within a planned commercial and industrial precinct that aims to set a new international benchmark for smart design, ecological sustainability and amenity.

Numerous technical studies and investigations have been undertaken during the development of the Parkes SAP Masterplan, Delivery Plan and State Environmental Planning Policy (Precincts - Regional) 2021, which have been used to inform the preparation of this Concept Design Statement.

## 1.3 Project Overview

The proposal involves the subdivision of Lot 1 DP 1251595 into two (2) new allotments. The key elements of the proposal are as follows:

- + Torrens Title subdivision into two (2) new lots.
- + Proposed Lot 10 to have an area of approximately 21.09 hectares to accommodate the existing Pet Care Kitchen, existing driveway and access to Brolgan Road, existing on-site wastewater management system, existing on-site stormwater detention pond, existing electricity supply mains and natural gas pipeline connections and telecommunications. Part of the new Pet Care Distributors PV Solar Farm (behind the meter assets) will also be accommodated within proposed Lot 10.
- + Proposed Lot 11 to have an area of approximately 12.77 hectares to accommodate an existing secondary access to Brolgan Road, existing farm dam, landscaping directly south of Brolgan Road and the balance of the proposed new solar farm (in front of the meter assets). It is proposed the existing access will be upgraded to a rural access standard and an easement will be created along the western boundary for the drainage of surface water from proposed Lot 10 to the Brolgan Road drainage system.

The Arndell Surveying Subdivision Layout Plan (and other documents) are attached separately to this request for an APC and show the extent of proposed works.

## 1.4 Format of this Document

This Concept Design Statement responds to the requirements of the Parkes SAP Delivery Plan. The statement has been prepared as a single document of several sections, as follows:

*Table 1 - Format of the document*

Section	Description
Section 1	Describes the project and the main project drivers
Section 2	Describes the main features of the site and surrounds
Section 3	Describes the existing environmental conditions, particularly biodiversity, heritage, stormwater, road access and infrastructure conditions
Section 4	Describes the subdivision proposal
Section 5	Reviews the proposal against the relevant legislation and planning policy framework
Section 6	Provides the planning assessment of the proposal in regards to Parkes SAP Masterplan and Delivery Plan requirements
Section 7	Undertakes an impact assessment of the main issues associated with the proposal
Section 8	Justifies the proposal against the Parkes SAP environmentally sustainable development principals and other relevant best practice standards
Section 9	Provides the conclusion for the issue of an APC

## DESCRIPTION OF THE SITE

### 2.1 Site Description

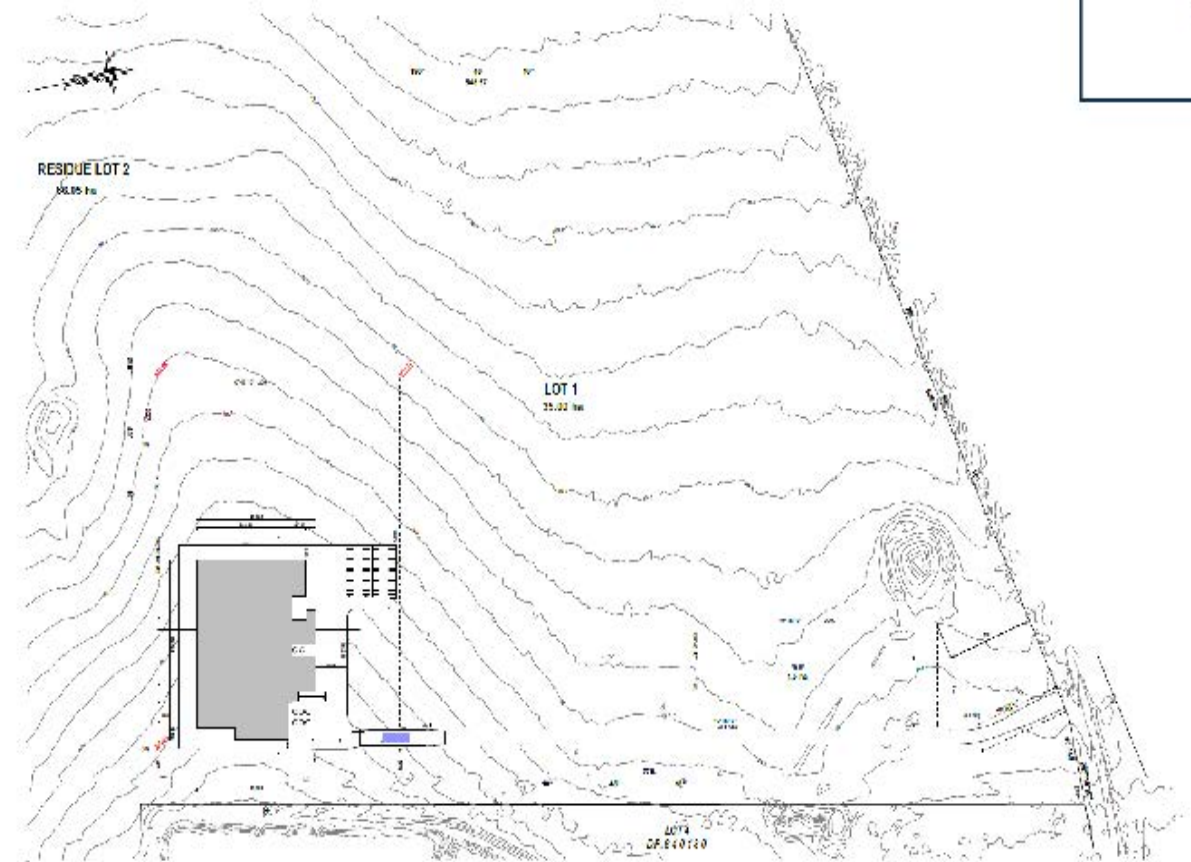
The site of the proposal is described as Lot 1 DP 1251595, Brolgan Road, Parkes.

The site is owned by Pet Care Distributors and contains the existing Pet Care Kitchen located towards the rear of Lot 1 DP 1251595, with access gained from Brolgan Road via an existing driveway adjoining the eastern boundary of the site. The existing premises includes a large format factory building, grain silo storage areas, food grade oil storages, hardstands, driveways and parking areas, unloading and loading areas, on-site wastewater management system, stormwater management system and landscaping.

The site is not known to be impacted by any significant environmental constraints or hazards such as significant flooding or bushfire. Minor overland flow flooding along the northern boundary of the site adjoining the Brolgan Road has been highlighted in the Parkes SAP Master Plan and Delivery Plan, as well as the recently updated Flood Study for the Parkes SAP.

The site has existing accesses from Brolgan Road, which is currently being upgraded to function as an arterial industrial road for the Parkes SAP. Reticulated water supply, electricity, gas and telecommunications have already been connected to the site.

Figure 1  
Existing Site Layout Map



## 2.2 Land-use and Zoning

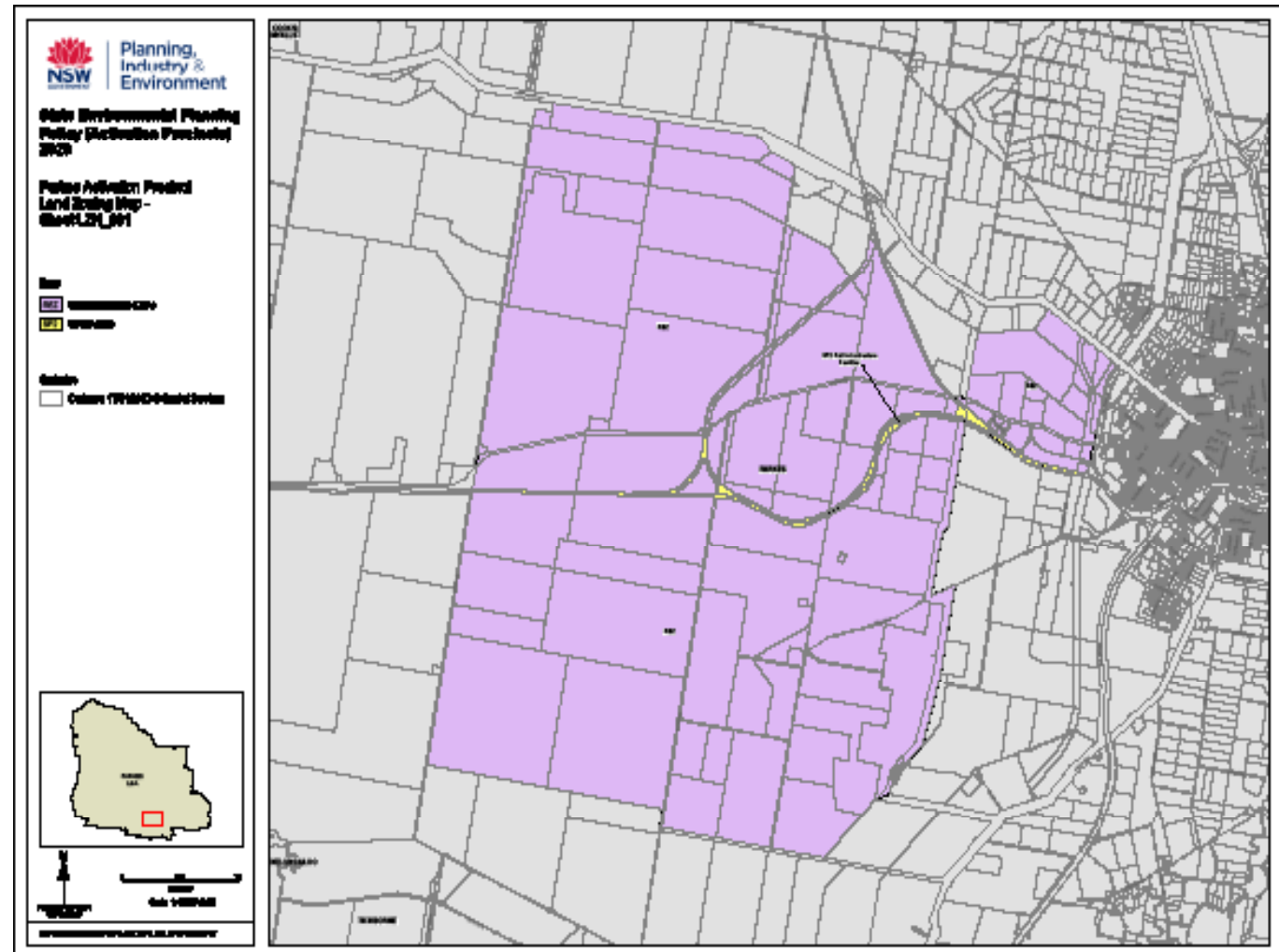
The subject site is zoned REZ Regional Enterprise Zone under State Environmental Planning Policy (Precincts-Regional) 2021.

A range of industrial and commercial land-use activities are permitted in the REZ Regional Enterprise Zone, including subdivision of land.

Approval has already been granted for the Pet Care Kitchen under Development Consent No. DA2018/0131 granted by Parkes Shire Council on 16 April 2019. The Pet Care Kitchen is fully operational in accordance with DA2018/0131, with various alterations and additions also being subsequently approved / authorised, including rural produce storage additions and on-roof PV solar installations.

APCs have also been issued for recent alterations and additions at the Masterpet site, including an APC issued on 11 April 2023 for a proposed new Pet Care Kitchen PV Solar Farm.

Figure 2  
Land Use Zoning Map





### 2.3 Surrounding Land-use

The site is currently surrounded by a mix of rural, industrial, transport / inter modal type land-uses, as well as public roads and railways.

The infrastructure and services in and around the site are in the process of being upgraded as part of the Parkes Newell Highway Bypass and Stage 1 Parkes SAP Enabling Works.

Figure 3 provides a snapshot of some of the main land-uses and public assets in close proximity to the Pet Care Kitchen site.

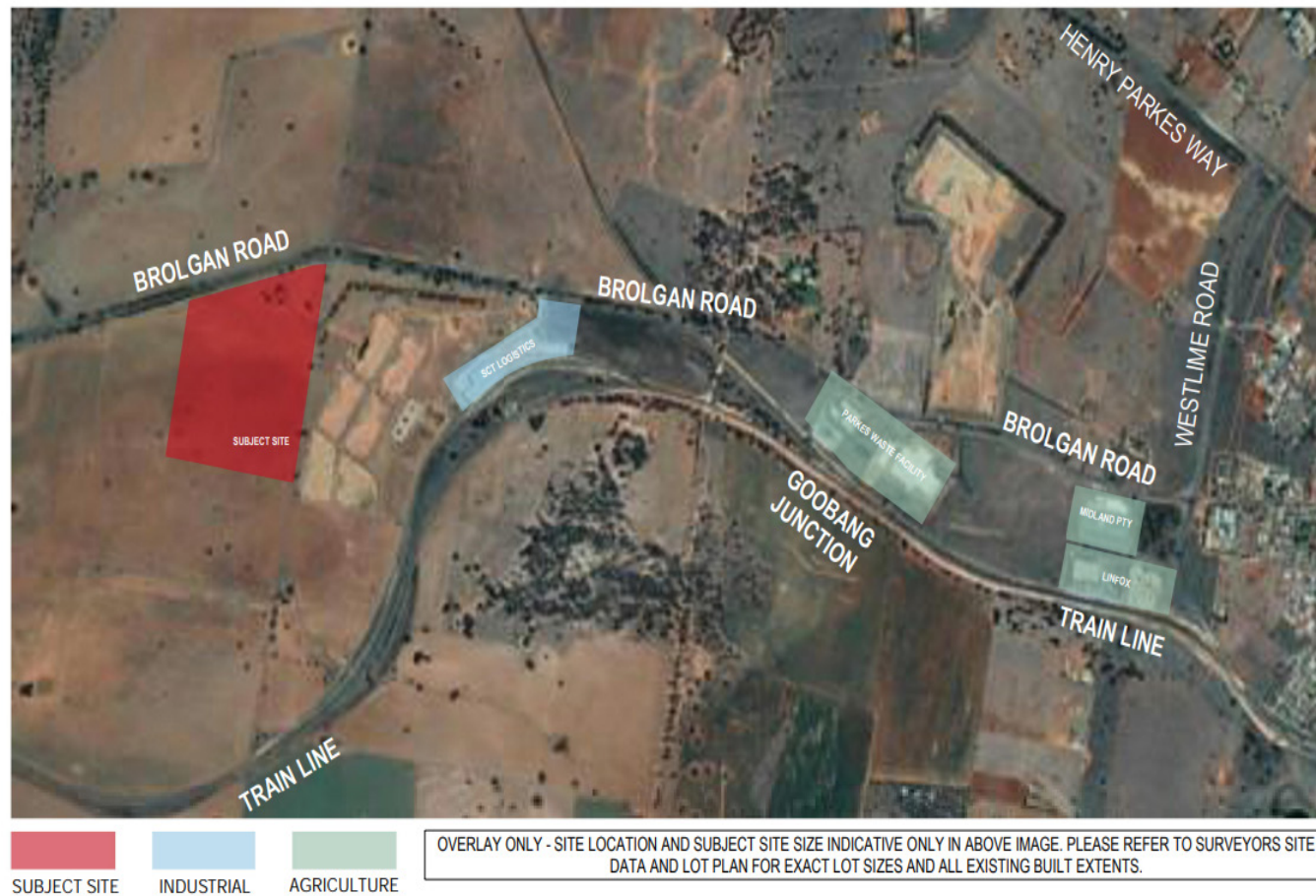


Figure 3  
Surrounding Land-use Map

## THE EXISTING ENVIRONMENT

The site has been historically used for broad-acre farming and more recently works associated with the construction and operation of a Pet Care Kitchen owned by Pet Care Distributors.

The site gains access from Brolgan Road, which is currently being upgraded in accordance with Stage 1 Parkes SAP Enabling Works . The Pet Care Kitchen has an existing constructed access to Brolgan Road, which is capable of accommodating all traffic generated from the premises. A separate existing rural access is located further west along Brolgan Road, which is used primarily by farm management and maintenance vehicles.

The Pet Care Kitchen is fully operational on the site and includes a large factory building, grain silo storage areas, food grade oil storages, hardstands, driveways and parking areas, unloading and loading areas, on-site wastewater management system, stormwater management system and landscaping.

An Activation Precinct Certificate has been issued on 11 April 2023 for a proposed new Pet Care Kitchen PV Solar Farm.

Various studies have been undertaken on the site, including a Biodiversity Assessment Report (BAR) prepared by The Environmental Factor in 2018 to appraise the ecological values and constraints relating to the whole of the site. The BAR concluded no significant impacts on threatened flora or fauna species and no requirement for participation within the Biodiversity Offset Scheme (BOS) under the Biodiversity Conservation Act 2016 and Regulation 2017.

The biodiversity assets of the site and surrounds have been mapped in State Environmental Planning Policy (Precincts - Regional) 2021, including several isolated paddock trees that have been mapped as environmentally sensitive.

## DESCRIPTION OF THE PROPOSAL

### 4.1 Objectives of the Proposal

The principal objective of the proposal is to obtain an APC from RGDC for the proposed subdivision of Lot 1 DP 1251595 into two (2) allotments.

The objectives for the proposal are to:

- + Comply with the strategic vision, general objectives and relevant performance criteria for the Parkes SAP.
- + Support the provision of a sustainable electricity supply to the Pet Care Kitchen to reduce power costs and the carbon footprint of the business.
- + Ensure the existing Pet Care Kitchen and proposed new solar farm fits within the locality and complies with all relevant design criteria and the BCA.
- + Ensure new lots have necessary infrastructure and services to allow for their intended future operations.

### 4.2 Overview of the Proposal

The proposed subdivision will assist with formalising business arrangements at the Pet Care Distributors Pet Care Kitchen and PV Solar Farm. Key features of the proposal are summarised below:

- + Proposed Lot 10 to have an area of approximately 21.09 hectares to accommodate the existing Pet Care Kitchen, existing driveway and access to Brolgan Road, existing on-site wastewater management system, existing on-site stormwater detention pond, existing electricity supply mains and natural gas pipeline connections and telecommunications. Part of the new solar farm (behind the meter assets) will also be accommodated within proposed Lot 10.
- + Proposed Lot 11 to have an area of approximately 12.77 hectares to accommodate an existing secondary access to Brolgan Road, existing farm dam, landscaping directly south of Brolgan Road and the balance of the proposed new solar farm (in front of the meter assets). It is proposed the existing access will be upgraded to a rural access standard and an easement will be created along the western boundary for the drainage of water from proposed Lot 10 to the Brolgan Road drainage system.

### 4.3 Drawings and Visuals

The Concept Design Statement is supported by the following drawings and reports:

- + Currajong covering letter, dated 21 April 2023.
- + RGDC APC Checklist, dated April 2023.
- + RGDC APC Statement of Consistency, dated April 2023.
- + Arndell Surveying Subdivision Layout Plan, dated 12 April 2023.
- + Pet Care Kitchen PV Solar Farm Architectural Drawings, prepared i2C Architects, dated 23 November 2022.
- + Pet Care Kitchen Solar Farm Landscape Plan, prepared by Constructive Energy and Ecostaff, dated 30 August 2022.
- + Pet Care Kitchen Solar Farm - Land and Water Management Plan, prepared by Constructive Energy, dated 2022.
- + Biodiversity Assessment Report, prepared by The Environmental Factor, dated 21 December 2018.

## PLANNING FRAMEWORK OVERVIEW

### 5.1 International Framework

The Parkes SAP aims to be Australia's first UNIDO Eco Industrial Park (EIP). It will offer companies a competitive advantage through a circular economy to conduct recycling and resource recovery activities, on-site energy generation, manufacturing, value-add agricultural activities and efficient inter-modal and freight transport logistics.

New developments are required to demonstrate environmentally sustainable designs and management frameworks to respond to local conditions and contribute to the Parkes SAP goal to become an EIP.

The proposed subdivision is permitted on land zoned REZ Regional Enterprise Zone. The proposal is supportive of the environmentally sustainable management framework proposed at the Parkes SAP, with the principal goal of the project to provide more sustainable power supply to the Pet Care Distributors Pet Care Kitchen and potentially to other businesses at the Parkes SAP.

### 5.2 Commonwealth Framework

Under the Federal Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act), referral is required to the Australian Government for proposed actions that have the potential to significantly impact on Matters of National Environmental Significance (MNES) or the environment of Commonwealth land.

Assessment of the proposal's impact on MNES confirms there is unlikely to be a significant impact on relevant MNES or on Commonwealth land. Accordingly, the proposal would not warrant referral under the EPBC Act. Commonwealth Framework.

### 5.3 NSW Framework

The NSW government has prepared specific environmental planning legislation to guide the development of activation precincts, including the Parkes SAP. The principal environmental planning instrument applying to the site is State Environmental Planning Policy (Precincts - Regional) 2021. The proposal is assessed to be generally consistent with the Parkes SAP Masterplan, Delivery Plan and State Environmental Planning Policy (Precincts - Regional) 2021.

Several pieces of NSW legislation apply to land / development within the Parkes SAP, as follows:

- + Environmental Planning and Assessment Act 1979 - forms the legal and policy platform for development assessment and approvals process in NSW. In accordance with the Act, an APC is proposed to be obtained to guide further approvals processes.
- + Local Government Act 1993 - specifies that approvals are required for a number of activities carried out on operational land. No local government approvals would be required for the proposal.
- + Heritage Act 1977 - provides for the conservation of environmental heritage, with the site not listed on the State Heritage Register or requiring detailed heritage impact assessment.
- + National Parks and Wildlife Act 1974 - provides the basis for the legal protection of flora and fauna and Aboriginal sites within NSW, with no threatened species or Aboriginal sites being identified.
- + Roads Act 1993 - requires consent from the road authority for works on public roads, which is required from RGDC / Parkes Shire Council.

- + Biodiversity Conservation Act 2016 - provides for the management of flora and fauna on lands within NSW, with The Environmental Factor Biodiversity Assessment Report concluding the need for a Biodiversity Development Assessment Report is not warranted.
- + Protection of the Environment Operations Act 1997 - regulates air, noise, land and water pollution, with the nature and scale of the proposed not triggering the need for licensing by EPA.
- + Work Health and Safety Act 2011 - controls the management and handling of hazardous substances and dangerous goods in NSW, with no hazardous or offensive goods currently stored or proposed to be stored / handled at the site.
- + Noxious Weeds Act 1993 - provides for the declaration of noxious weeds by the Minister for Primary Industries and landowner responsibility for the control of noxious weeds, with no specific impact mitigation or approvals required for the proposal to manage noxious weeds.
- + Contaminated Land Management Act 1997 - with no requirement for EPA notification as per the Guidelines on the Duty to Report Contamination under the Contaminated Land Management Act 1997, as no contamination / risks have so far been identified on the site.

## PLANNING ASSESSMENT

The Concept Design Statement provides the basis for applying for an APC to be issued by RGDC. The main elements of the planning and assessment framework for the Parkes SAP in relation to the issue of an APC for proposed subdivision are assessed in this section.

### 5.1 Parkes SAP Masterplan

The Parkes SAP Masterplan was published by the NSW Government in June 2020, and identifies the vision for the precinct. The Masterplan applies to over 4,800 hectares of land within six sub-precincts, as shown in Figure 2 of the Masterplan and reproduced to the right of page.

FIGURE 2 PARKES SPECIAL ACTIVATION PRECINCT MASTER PLAN

#### The Regional Enterprise sub-precinct

is located at the cross-section of new and existing rail lines. It will accommodate a range of businesses including rail and road transport terminals, warehousing, advanced manufacturing and food processing businesses.

#### The Resource Recovery and Recycling sub-precinct (west)

will include the future energy from waste facility.

#### The Intermodal and rail terminal facility area

land adjacent to the rail line that is strategically important to preserve opportunities for rail and transport infrastructure. This is crucial to maintaining the precinct's competitive advantage as a freight and logistics hub.

#### The Intensive Livestock Agriculture sub-precinct

is suitable for an abattoir and other livestock value-adding businesses. This sub-precinct is located away from the Parkes township and the regional enterprise employment areas, and north of the Sydney-Perth rail line, creating a buffer for impact-generating activities.

#### The Solar sub-precinct

recognises the significant investment already made in renewable energy generation and supports the Special Activation Precinct in becoming Australia's first UNIDO Eco-Industrial Park.

#### The Commercial Gateway sub-precinct

will provide a transition between industry and the township of Parkes. The precinct is located on the proposed Newell Highway, offering opportunities to service local and travelling customers.

#### Stormwater flow paths

have been designed to accommodate stormwater management and detention areas which respond to a range of flooding events.

#### New or upgraded trunk roads within precinct

will be delivered by the corporation or as part of private development.

#### The Resource Recovery and Recycling sub-precinct

is located near the centre of the site and includes the existing Westtime quarry and landfill. Co-located with the intermodal transport network, this area is ideally placed to receive and reprocess waste, championing circular economy principles as part of an Australian-first Eco-Industrial Park.

#### New roads (potential subject to investigation)

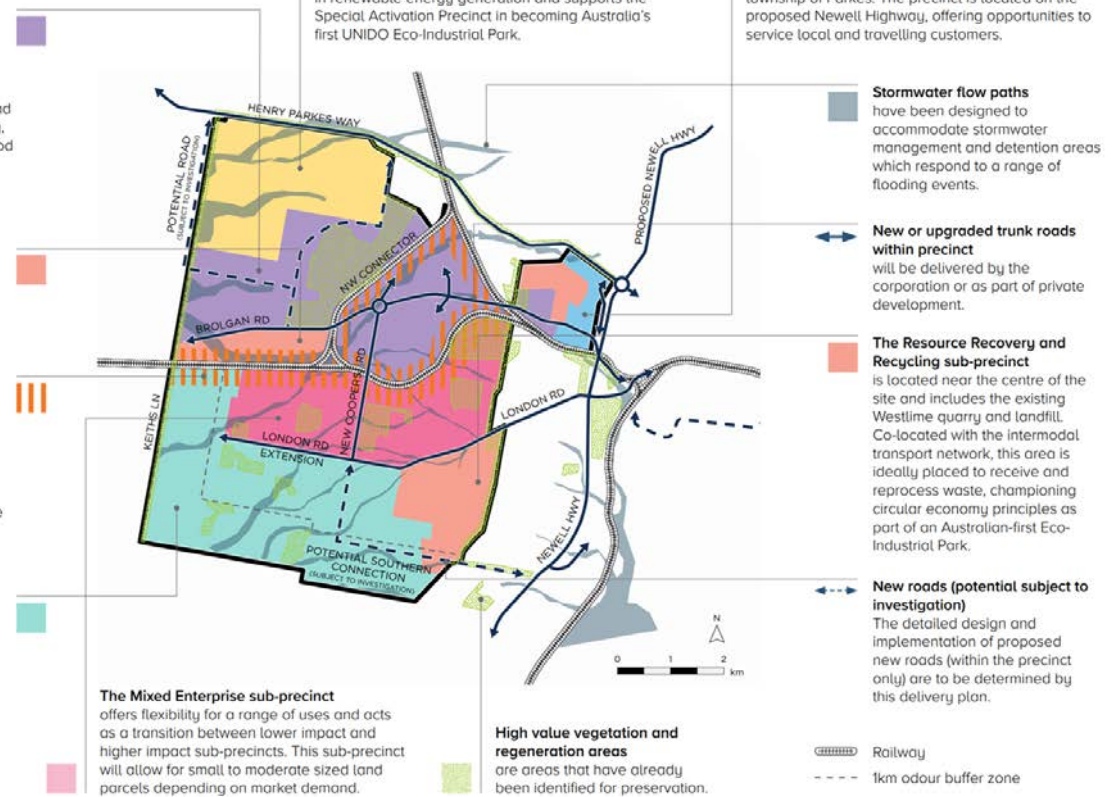
The detailed design and implementation of proposed new roads (within the precinct only) are to be determined by this delivery plan.

#### The Mixed Enterprise sub-precinct

offers flexibility for a range of uses and acts as a transition between lower impact and higher impact sub-precincts. This sub-precinct will allow for small to moderate sized land parcels depending on market demand.

#### High value vegetation and regeneration areas

are areas that have already been identified for preservation.





Five principles underpin the planning for the Parkes SAP. Assessment of the proposal against the master planning principles is provided in the table below:

Masterplan Principle	Principle Objectives	Evaluation of proposal against master plan principle
Economic Development	The precinct will be an innovative precinct of enterprise and productivity that creates new job and economic development opportunities	The proposal involves subdivision of land zoned REZ Regional Enterprise Zone. The proposed subdivision is required to support the development of a PV Solar Farm to provide renewable electricity supply to power some of the main operations at the Pet Care Kitchen. Any electricity generated that is surplus to the needs of Pet Care Distributors will be directed into the central grid for use of 'green power' by other businesses at the Parkes SAP.
Environment and Sustainability	Likely the precinct will be Australia's first UNIDO Eco-Industrial Park	The proposed subdivision will support the provision of renewable electricity supply to power some of the main operations at the Pet Care Kitchen and potentially other businesses at the Parkes SAP. The proposal supports a number of environment and sustainability objectives of the SAP.
Community	The precinct will build on the Parkes National Logistics Hub and support Parkes and the wider region	The proposal will provide employment opportunities to the local community and contribute to the activation of the Parkes SAP through enhanced local utility services.
Place and Landscape	Development will protect natural features and strengthen connection to Country	The proposed subdivision will support the provision of renewable electricity supply to power some of the main operations at the Pet Care Kitchen and potentially other businesses at the Parkes SAP, which has been granted an APC from RGDC. A Landscape Plan has been prepared for the site which aims to enhance the native vegetation corridor along Brolgan Road and screen facilities at the Masterpet site as far as practical.
Infrastructure	The precinct will service the distribution of products through world class infrastructure	The proposal will not preclude access to public infrastructure. The site will have access to public roads and would be connected to reticulated water supply, natural gas utility services. No access onto the adjoining railway system is proposed.



## 5.2 Parkes SAP Delivery Plan

A delivery plan is required to be prepared for Activation Precincts as per Section 9 of State Environmental Planning Policy (Precincts - Regional) 2021. Performance-based planning assessment criteria have been included in the Parkes SAP Delivery Plan to achieve flexibility to achieve desired outcomes.

Assessment against the delivery plan performance criteria is provided as follows to demonstrate consistency with the plan:

Delivery Plan Performance Criteria	Performance Criteria Objectives	Evaluation of proposal against performance criteria
Site planning and layout	Including site coverage, setbacks, access, environmentally sensitive land and available infrastructure	Site analysis and plans have been prepared to determine optimum lot layout, access and stormwater management and drainage. The proposal will not preclude access to public infrastructure and will connect to available infrastructure.
Building design	Including building form, environmental design, orientation, facades treatment, awnings and sun shading, service areas, lighting and signage	The proposed subdivision layout has been carefully considered to ensure compliance with the BCA and other relevant performance criteria.
Landscape Design	Including landscaping of primary street frontages and site interface, entry thresholds and driveways, car parks and other areas	A Landscape Plan has been prepared for the site which aims to enhance the native vegetation corridor along Brolgan Road and screen the solar fields as far as practical.
Street design	Including enhancement of Brolgan Road and other access roads	The proposal is designed to utilise the existing vehicular accesses onto Brolgan Road. The existing access to the north-west of the site fronting Brolgan Road is proposed to be upgraded to service as the primary access for the construction of the Pet Care Kitchen PV Solar Farm. The proposal will also provide additional landscaping along the Brolgan Road frontage that meets performance criteria.



### 5.3 SEPP (Precincts - Regional) 2021

State Environmental Planning Policy (Precincts - Regional) 2021 applies to the site. The subject site is zoned REZ Regional Enterprise Zone under the Precincts SEPP. The objectives of the REZ zone are:

- + To encourage regional enterprise and innovation in industry, environmental management and performance and in urban and industrial design.
- + To effectively manage land uses of varying intensities or environmental sensitivities, and to minimise the risk of conflict associated with incompatible land uses.
- + To provide opportunities for regional economic development and employment.
- + To attract industries that would contribute to and benefit from being close to major freight transport networks.
- + To protect and enhance the local character of the precinct and contribute to the surrounding environment and its amenity.
- + To encourage the development of industry leading renewable energy generation and resource and waste management.

Subdivision is permitted on land zoned REZ Regional Enterprise Zone. Assessment against the development standards in the Regional Precincts SEPP 2021 is provided as follows to demonstrate consistency with the plan:

SEPP development standards	Development standards objectives	Evaluation of proposal against development standards
Preservation of trees	Including site coverage, setbacks, access, environmentally sensitive land and available infrastructure	A Landscape Plan has been prepared for the site which aims to enhance the native vegetation corridor along Brolgan Road and screen the solar fields as far as practical.
Parkes LEP provisions	Including clauses 2.6(1), 2.7 and 2.8 of the Parkes Local Environmental Plan 2012 requiring development consent for subdivisions, demolition and temporary use of land	Upon receiving of an APC from RGDC, it is intended to obtain a Development Consent for the proposed subdivision.
Infrastructure SEPP provisions	Including clauses 48, 94, 95A, 106 and 125 relating to development permitted without consent	It is expected that any relevant requirements, infrastructure upgrades and / or contributions will be highlighted as part of the APC process.
Development near electricity networks	Consultation with Essential Energy where new development is in close proximity to certain electricity supply assets	The proposal does not detrimentally impact on electricity transmission lines and / or distribution networks.
Development in pipeline areas	Consultation with pipeline operator where new development is in close proximity to pipelines	The proposal does not detrimentally impact on pipelines.
Development in rail corridors	Consultation with rail authority where new development involves crossing of railways or impacts on rail corridors	The proposal does not involve direct interactions with railways.



## 5.4 Environmental Issues Assessment

The relevant matters for consideration for new development under the Environmental Planning and Assessment Act 1979 are broadly assessed in this section.

Environmental Issue	Risk of Impact without mitigation	Risk of impact with proposed mitigation	Comment on preliminary concept design
Character	Likely	Low	The proposal is well conceived to support the objectives of Pet Care Distributors and the wider objectives for the Parkes SAP. The frontage adjoining Brolgan Road is proposed to be planted with native vegetation to enhance the landscaping proposed along Brolgan Road and to screen the solar farm from public views.
Visual	Likely	Low	The proposal has been designed to minimise visual amenity impacts, as viewed from nearby houses, industries and public areas. The frontage adjoining Brolgan Road is proposed to be planted with native vegetation to enhance the landscaping proposed along Brolgan Road and to development activities from public views from this roadway.
Acoustic	Unlikely	Low	Noise emissions from the proposal are unlikely to impact nearby receivers.
Odour	Unlikely	Low	The proposal will not produce a strong odour.
Microclimate	Unlikely	Low	The proposal will not significantly impact microclimate and has been designed to complement EIP and ESM frameworks.
Access to property	Likely	Low	The proposal has been designed to utilise existing accesses onto Brolgan Road.
Utilities and public transport	Likely	Neutral	The proposal adjoins Brolgan Road and could access public transport and active transport services and infrastructure when they become available.
Road and rail	Likely	Low	The proposal has been designed to utilise existing accesses onto Brolgan Road. Direct access to railways or other public roads is not proposed.
Public domain	Unlikely	Low	The proposal will not impact the public domain as it will be located on private land.
Public infrastructure	Likely	Low	The proposal will not preclude access to public infrastructure. The proposal adjoins Brolgan Road and is already connected to reticulated water supply, gas, electricity and telecommunications.
Other built assets	Unlikely	Low	The proposal will not preclude access to other built assets.
Natural	Likely	Low	The natural heritage of the site is not compromised by the proposed development. Isolated paddock Grey Box Eucalypts have been shown on the Environmentally Sensitive Area Map under the Regional Precincts SEPP. Several trees are required to be removed as part of this proposal, which are detailed on the i2C Architectural Drawings.
Cultural	Unlikely	Low	The proposal will not impact on cultural values in the public domain.
Aboriginal culture	Unlikely	Low	There are no Aboriginal cultural sites / items registered on the site. The proposed subdivision would implement the unexpected finds procedure during construction.

Environmental Issue	Risk of Impact without mitigation	Risk of impact with proposed mitigation	Comment on preliminary concept design
Built	Unlikely	Low	There are no built heritage items registered on the site.
Health	Unlikely	Low	Emissions from the existing Pet Care Kitchen will continue to below NSW guidelines at the nearby receptors, therefore minimising the possibility of any health impacts to the community. The construction phase of the PV field install can be controlled to ensure the proposal does not contribute to any known health issues / risks.
Safety	Likely	Low	The proposal has been assessed as not increasing a known safety risk.
Services and facilities	Likely	Low	The proposal does not impact access to public services or facilities.
Cohesion, capital and resilience	Likely	Positive	The proposal will provide employment opportunities to the local community and contribute to the activation of the Parkes SAP through enhanced local services.
Housing	Unlikely	Neutral	No detrimental impacts on housing supply / demand are envisaged.
Natural resource area	Likely	Low	The proposal will utilise available natural resources in a sustainable manner.
Livelihood	Likely	Positive	The proposal will provide employment and services to the Parkes SAP and wider community.
Opportunity cost	N/A	Neutral	The net benefit to the Parkes SAP and wider community outweighs the utilisation of natural resources and other products at construction phase. The opportunity cost would favour the use of the land for electricity generating works that would support sustainable industry and commercial activities on the site and at the Parkes SAP.
Air emissions	Unlikely	Low	The proposal is unlikely to exceed NSW EPA air quality criteria. Air quality mitigation measures will be implemented during the construction phase to ensure compliance.
Native vegetation and fauna	Likely	Low	A Landscape Plan has been prepared for the site which aims to enhance the native vegetation corridor along Brolgan Road.
Stability, structure, land capability, topography	Likely	Low	While the proposal will result in land disturbance, controls will be in place to overcome these impacts during construction phase.
Quality, availability, hydrological flows	Unlikely	Low	Soil and water management measures will be implemented to ensure the proposed development has minimal impact to surrounding water bodies and hydrological flows. Stormwater has been designed to detain overland flows prior to entering the established stormwater drainage system.

## ENVIRONMENTAL IMPACT ASSESSMENT

The main environmental issues / impacts that have been raised and investigated as part of the preparation of the subdivision are documented in this section.

### 5.1 Biodiversity Impact Assessment

The site has been used historically for broad-acre farming and more recently for the Pet Care Kitchen.

Review of State Environmental Planning Policy (Precincts - Regional) 2021 identifies several paddock trees that are in close proximity of the solar fields located towards the north-eastern part of the site that are mapped as environmentally sensitive. These trees are located around an existing dam and are not proposed to be removed.

Management procedures for the protection of native vegetation and embellishment of the native vegetation corridor along Brolgan Road as well as soils and water management have been incorporated into the design plans that form part of the APC application.

No areas of Outstanding Biodiversity Value are recorded to occur on or around the site, as defined under the BC Regulation 2017. Previous studies carried out at the Parkes SAP (see Parkes SAP Masterplan and Stage 1 Parkes SAP Enabling Works REF) have also not identified any outstanding biodiversity assets or issues in and around the site.

The Threatened Species Profiles database identifies a number of flora and fauna species listed under the BC Act that are predicted or are known to occur in the subregion. Field surveys have so far not detected any of the predicted threatened flora or fauna species.

The Test of Significance Assessment under Section 7.3 of the BC Act reveals no areas of outstanding biodiversity values or significant impacts on threatened flora or fauna species or ecological communities in and around the site, or entry to the BOS. A Biodiversity Development Assessment Report (BDAR) is not warranted for the proposal.

Test of Significance	Assessment
Section 7.3(1)(a) - likely adverse affect on the life cycle of threatened species	The Environmental Factor Biodiversity Assessment Report (BAR) prepared in 2018 concluded no significant impacts on threatened flora or fauna species and no requirement for participation within the Biodiversity Offset Scheme (BOS) under the Biodiversity Conservation Act 2016 and Regulation 2017. No significant adverse affects on the lifecycle of threatened species are predicted as a result of the subdivision proposal.
Section 7.3(1)(b) - likely adverse effect on the extent or composition of an endangered ecological community	The Threatened Species Profiles database identifies a number of flora and fauna species listed under the BC Act that are predicted or are known to occur in the subregion. Field surveys have so far not detected any of the predicted threatened flora or fauna species. Due to minimal clearing below BOS thresholds, a BDAR is not required to be undertaken.
Section 7.3(1)(c) - likely adverse affects on habitat of threatened species or ecological community	Field surveys have so far not detected any of the predicted threatened flora or fauna species. Any species would likely comprise predatory bird species foraging over wide areas. It is unlikely that species will be adversely impacted.
Section 7.3(1)(d) - likely adverse affect on declared area of outstanding biodiversity value	No Areas of Outstanding Biodiversity Value are recorded to occur on or around the site, as defined under the BC Regulation 2017.
Section 7.3(1)(e) - potential for the development to be part of a key threatening / impact process	The proposal is unlikely to cause a significant affect on threatened species or their habitats. Construction works will be carried out under controlled conditions.

## 5.2 Visual Impact Assessment

The site sits within the context of a mixed rural and industrial area that is rapidly changing into the Parkes SAP, with new roads, bridgeworks, drainage work and other infrastructure being constructed and new industrial / inter modal activities surrounding Masterpet site.

The site has a distinct 'under complete construction' character, which will change further once the Parkes SAP Infrastructure Enabling Works are completed and more regional enterprises are established.

Planned works at the Pet Care Kitchen site will lead to changes in the urban landscape. An assessment of the potential impacts of the proposed development on visual amenity has been undertaken, including an assessment of the likely visual impacts of the development on private landowners in the vicinity of the development and key vantage points in the public domain. It is assessed that the physical changes to the landscape will not create significant impacts on the context and setting of the area.

The Pet Care Kitchen and solar farm has been designed to conform to the existing site attributes, particularly the topography of the land sloping down towards Brolgan Road and the Inland Railway. Landscape screening along Brolgan Road is proposed, with Pet Care Distributors proposing additional plantings of native vegetation along the frontage of their premises. Due to the alignment of Brolgan Road and the landscaping proposed, it is assessed that existing / new works will not be prominent to traffic traveling along public roads or passing trains.

The site is not visible from Parkes and there are few existing residences in the area which are well setback and screened from the Pet Care Kitchen site by existing vegetation, topography and built structures. Proposed new landscaping and careful design / placement of solar fields ensures amenity impacts will be minimised to acceptable levels.

Given the above visual impact assessment findings, a more detailed visual impact assessment of the proposal has not been completed.

## 5.3 Traffic and Access Assessment

The Pet Care Kitchen will continue to use the existing primary access and driveway for all trips generated from their factory premises.

It is proposed to upgrade an existing access onto Brolgan Road towards the north-west of the site to service a temporary construction compound that will be established during the construction phase. The new access will be at a location where there is an existing rural access gate onto Brolgan Road. The existing access is required to be upgraded to accommodate truck deliveries and other construction vehicles in accordance with the Austroads Guide and any other requirements of Parkes Shire Council and / or RGDC.

Assessment of the implications of the proposed access upgrades has been undertaken against the general functioning of the road network, intersections and level crossings in the area. The proposed development is not traffic generating development and is not development that has implications for main roads or railways. All accesses have safe sight distance and there are no implications for nearby infrastructure, existing trees, drainage lines or the like. The architectural plans prepared by i2C demonstrate a surplus of car parking will be provided.

Detailed engineering design plans of the access upgrades are being developed and will be submitted to the relevant road authority for approval.

## 5.4 Biodiversity Assessment

The site has been used historically for broad-acre farming and more recently for the Pet Care Kitchen. The site is majorly cleared of native vegetation. Several isolated paddock trees are located on various parts of the site, with no mid-storey vegetation and ground cover comprising predominantly introduced grasses, crops and weeds.

The Environmental Factor Biodiversity Assessment Report (BAR) prepared in 2018 concluded no significant impacts on threatened flora or fauna species and no requirement for participation within the Biodiversity Offset Scheme (BOS) under the Biodiversity Conservation Act 2016 and Regulation 2017. The proposed subdivision works will be undertaken on open paddocks that were shown in previous field surveys to be largely devoid of native vegetation.

Several isolated paddock trees are proposed to be removed towards the centre of the site to accommodate proposed new solar fields. Clearing of these trees has been detailed on the iC2 Architectural Drawings, with the extent of clearing not triggering entry into the BOS. None of the trees proposed for removal are shown on the Environmentally Sensitive Area Map under the Regional Precincts SEPP 2021.

The Test of Significance under Section 7 of the BC Act 2016 confirms no significant impacts on threatened species.

Management procedures for the enhancement of native vegetation corridors, soils and water management have been incorporated into the design plans that form part of the APC application.

## 5.5 Noise and Vibration Assessment

The POEO Act sets the statutory framework for managing noise and vibration in NSW. The EPA Noise Policy for Industry 2017 (NPI) has been used to establish noise criteria and assessment findings for the proposed new development.

Relevant assessment criteria to control noise generated from the proposal are as follows:

- ✚ Noise Management Levels (NMLs) for construction activities for all residential receivers are 45dB LAeq(15min) (RBL +10dB).
- ✚ The PINLS for the proposal are 35dB LAeq(15min) for the morning shoulder and 40dB LAeq(15min) for the day period.
- ✚ The PANLS for the proposal are 43dB LAeq(15min) for the night / morning shoulder and 50dB LAeq(15min) for the day.
- ✚ The PNTLS for the proposal are therefore 35dB LAeq(15min) for the morning shoulder and 40dB LAeq(15min) for the day period.

Noise emissions and vibration associated with the construction phase of the subdivision are unlikely to have a significant noise impact due to the separation from nearby sensitive receptors and proposed construction works being undertaken in daylight hours.

Noise emissions associated with the operational phase activities during the daytime and night are unlikely to have a significant noise impact due to the separation from nearby sensitive receptors and the low noise footprint of solar farms during normal operations.

Given the above noise assessment findings, a more detailed noise impact assessment has not been completed.

## 5.6 Air Quality Assessment

The POEO Act sets the statutory framework for managing air quality in NSW and the POEO (Clean Air) Regulation 2010 sets standards of concentration for emissions to air from both scheduled and non-scheduled activities, including odour, dust, emissions and excessive motor vehicle air impurities.

There is low potential for odour emissions to air from the proposed subdivision. Assessment of the proposal against the NSW EPA Technical Framework for the Assessment and Management of Odour from Stationary Sources in NSW, 2006 has not been undertaken.

Air quality assessment has focused on the potential for dust emissions to air at construction stage of the solar farm, which are assessed to pose no significant impact on air quality surrounding the site, given the area of disturbance is suitably offset from adjoining receivers and the ability to control visible dust through the watering of the ground surfaces during dry conditions and strong winds.

Once constructed, all ground surfaces not occupied by driveways or paths are intended to be established with grass cover or landscaping, which will limit potential for dust emissions to low levels.

Given the above air quality assessment findings, a more detailed air quality impact assessment has not been completed.

## 5.7 Water Quality Assessment

The site drains overland to the north-west and south-west to Brolgan Road and Coopers Lane.

All stormwater from factory hardstands and buildings drain into an on-site detention pond, with any overflow draining overland to the north-west.

Minor overland flow flooding along the northern boundary of the site adjoining the Brolgan Road has been highlighted in the SAP Masterplan and Delivery Plan documentation, as well as the recently updated Flood Study.

To ensure all surface waters from the developed areas of the Pet Care Distributors site drain appropriately to a legal point of discharge, the subdivision proposes the creation of an easement over Lot 11 to the Brolgan Road drainage system.

A Stormwater Management Plan is intended to be submitted with the Development Application in compliance with Australian Rainfall and Runoff and other relevant standards.

## EVALUATION + JUSTIFICATION OF THE PROPOSAL

Upon receiving of an APC from RGDC, it is intended to obtain development consent and a subdivision works certificate to allow construction of the subdivision to proceed under Part 4 of the Environmental Planning and Assessment Act 1979.

### 6.1 Policy / Legislation

#### 6.1.1 Environmental Planning Instruments

The provisions of the Regional Precincts SEPP 2021 have been considered in previous sections of this statement. In general, the proposal can comply with all relevant provisions in relevant environmental planning instruments.

#### 6.1.2 Any development control plan

There are no development control plans that apply. The Parkes SAP Delivery Plan includes development controls / performance standards. The proposal is consistent with all relevant Delivery Plan requirements.

#### 6.1.3 Proposed Environmental Planning Instruments

The proposal has been designed to be consistent with the Regional Precincts SEPP 2021 and Delivery Plan requirements.

#### 6.1.4 Any planning agreements

Infrastructure and services are being augmented at the development site, as per Stage 1 Parkes SAP Enabling Works. It is understood the proposal may be the subject of contributions for any upgrades beyond existing infrastructure conditions. At this stage no voluntary planning agreements are proposed.

### 6.2 Impacts

#### 6.2.1 The likely impacts of the development

The likely impacts of the proposed subdivision relate to drainage, roads and traffic and infrastructure. The proposed subdivision has been designed to minimise and / or mitigate potential impacts to acceptable levels. No significant detrimental impacts are considered likely as a result of the proposal.

#### 6.2.2 Cumulative impacts

The proposal will not result in a net impact to biodiversity, flooding, water quality, air pollution, noise, safety, loss of significant views, traffic, heritage or amenity. The proposal is assessed to be generally consistent with the Parkes SAP Masterplan, Delivery Plan and Regional Precincts SEPP.

Overall, the proposal makes a neutral / positive contribution to the Parkes SAP and wider environment and would not contribute to having a significant cumulative impact.

#### 6.2.3 Suitability of the site for the development

The site has the capacity to support the proposed Masterpet Pet Care Kitchen and PV Solar Farm without creating adverse impacts on the site or adjoining land. The proposal is considered suitable on the site.

#### 6.2.4 Safety, security and crime prevention

The design of the proposed subdivision has focused on the safety and well-being of all users, including future businesses, staff and contractors. The design maintains good safety standards. Adequate site security would be maintained and clear sight lines around entry / exits to achieve road safety.

#### 6.2.5 Public interest

The development site has been identified for regional enterprise zone activities under the Parkes SAP Masterplan, Delivery Plan and Regional Precincts SEPP. The proposal is permitted in the REZ Regional Enterprise zone.

There are no other specific policy statements from either Federal or State Government that are relevant to the proposal, nor any planning studies or strategies that need to be taken into account.

There are no covenants, easements or agreements that affect the proposal in the long term.

The proposal is assessed to pose no significant detrimental impacts on the public interest.

### 6.3 Ecologically Sustainable Development

ESD is a long-standing and internationally recognised concept. The concept has been affirmed by the 2002 World Summit for Sustainable Development and has been included in multiple pieces of Federal and State legislation. Australia's National Strategy for Ecologically Sustainable Development (1992) defines ecologically sustainable development as:

*“Development that improves the total quality of life, both now and in the future, in a way that maintains the ecological processes on which life depends”.*

The proposal has endeavored to address long established ESD principles, as follows:

- + The precautionary principle no serious environmental threats have been identified. No delays to the final design investigations or assessment process are recommended to allow for additional information, studies or surveys to take place under different conditions.
- + Inter-generational (social) equity - social equity provides a notion of preservation of environmental aspects that cannot be replaced for the enjoyment of future generations. Generally, such aspects relate to biodiversity, cultural heritage, land-use and the transformation of the locality as a result of the development. The proposal has considered such aspects and the concept design assessment concludes that environmental impacts would be minimal. By adopting the recommendations in this concept design statement, the operation of intergenerational equity can be maintained.
- + Conservation of biological and ecological integrity - site disturbance will be controlled and no impacts to native vegetation is proposed. Road reserves and adjoining frontages are expected to be the main areas of landscaping, as envisaged in the Parkes SAP Masterplan and the REF for Stage 1 Parkes SAP Enabling Works.
- + Improved valuation, pricing and incentive mechanisms - The small volumes of waste generated from the proposal would be appropriately managed to minimise impacts on common public areas, the appropriate pricing mechanisms are used to reflect the user pays approach to environmental management.

An environmentally sustainable design framework has been incorporated into the design plans to address the following:

- + Complying with the strategic vision, general objectives and performance criteria for development on land within the Parkes SAP.
- + Providing sustainable electricity supply to the Pet Care Kitchen to reduce costs of power and the carbon footprint of the business.
- + Designing PV solar fields based on site constraints and opportunities.
- + Maximising access to infrastructure and services already established at the Pet Care Kitchen.
- + Providing vegetation screening along the frontage of the site adjoining Brolgan Road to assist with the screening of solar fields from nearby properties and passing traffic.
- + Providing opportunities for other businesses at the Parkes SAP to gain access to 'green energy'.
- + Contributing to the Parkes SAP goal to become a UNIDO Eco-Industrial Park (EIP).
- + Identifying requirements to address EIP standards, or alternatively a commitment to developing an ISO140001 EMS framework.

## PROJECT CONCLUSION

This Concept Design Statement prepared by Currajong aims to allow the issue of an Activation Precinct Certificate for the proposed subdivision of the Pet Care Distributors Pet Care Kitchen and PV Solar Farm site (Lot 1 DP 1251595) into two new lots.

The proposal is assessed to be generally consistent with the matters for consideration under the Environmental Planning and Assessment Act 1979, Parkes SAP Masterplan, Delivery Plan and State Environmental Planning Policy (Precincts - Regional) 2021.

It is recommended that sufficient information has been submitted with the concept design statement to allow RGDC to make an informed decision on the proposal.

It is the findings of this statement that the proposed development should be supported and an APC issued.





Prepared by  
Currajong Pty Ltd  
205A Clarinda Street  
Parkes NSW 2870

[www.currajong.com.au](http://www.currajong.com.au)  
[info@currajong.com.au](mailto:info@currajong.com.au)

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