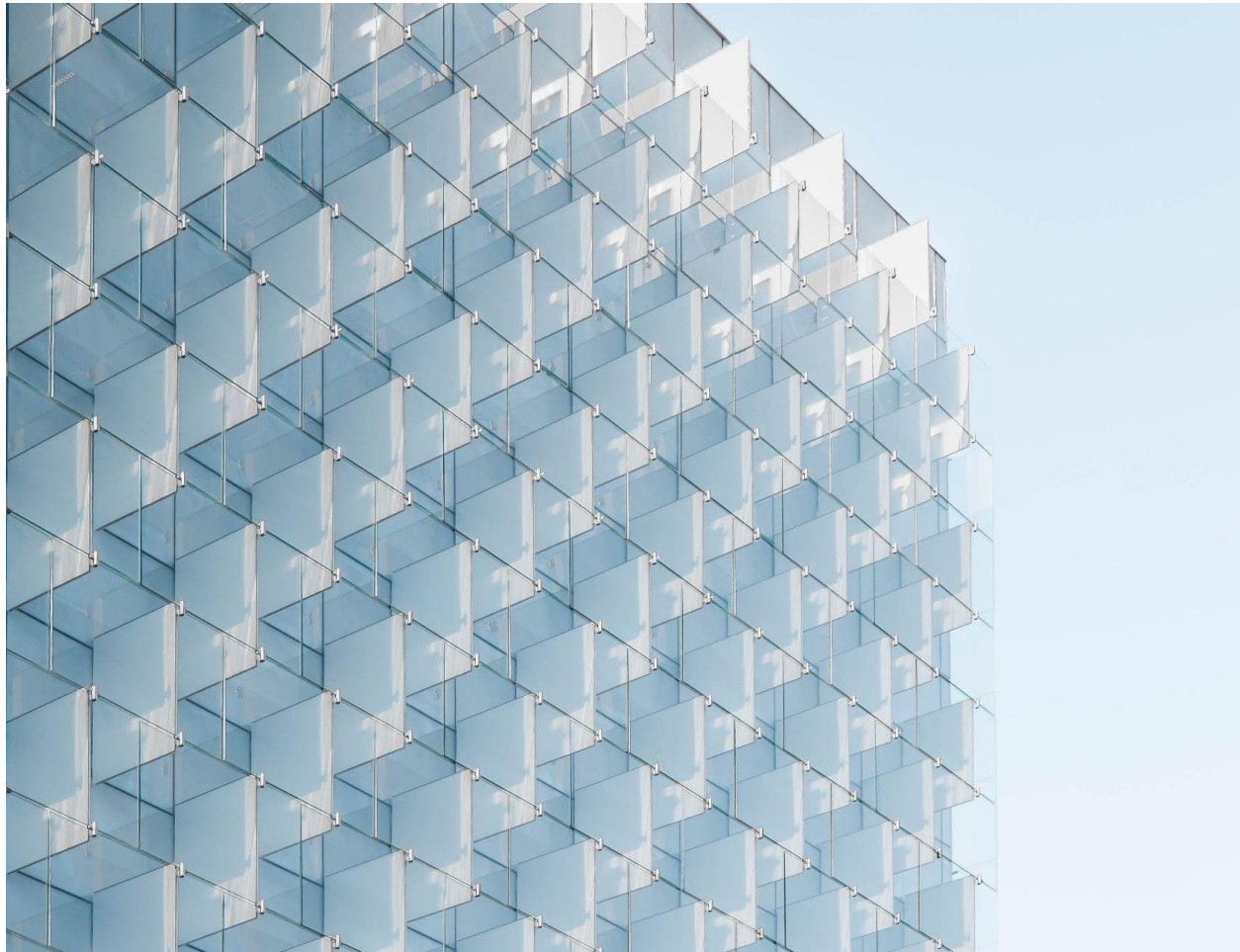


WILLOWTREE PLANNING



28 January 2025

Ref: WTJ24-523
Contact: Tim Gleeson



STATEMENT OF ENVIRONMENTAL EFFECTS:

ALTERATIONS AND ADDITIONS COMPRISING THE CONVERSION OF CAR PARKING SPACES INTO SELF-STORAGE UNITS

128 Milperra Road, Revesby
Lot 1 DP 1294099

—
Prepared by Willowtree Planning Pty Ltd
on behalf of The Trust Company (Australia) Limited as trustee for StorHub New South Wales Trust IV

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STATEMENT OF ENVIRONMENTAL EFFECTS

Alterations and Additions Comprising the Conversion of Car Parking Spaces into Self-Storage Units
128 Milperra Road, Revesby

In the spirit of reconciliation and recognition, Willowtree Planning acknowledges the Traditional Owners of this Country throughout Australia and their continuing and ongoing connections to land, waters and community. We show our respect to Elders – past and present. We acknowledge that we stand on this Country which was and always will be recognised as Aboriginal Land. We acknowledge the Traditional Owners of the Lands in this Local Government Area, belonging to the local Aboriginal People, where this proposal is located upon.

DOCUMENT CONTROL TABLE			
Document Reference:	WTJ24-523		
Contact	Tim Gleeson		
Version and Date	Prepared by	Checked by	Approved by
Version No. 1 – 09/12/2024	Tim Gleeson Town Planner	Andrew Cowan Director	Andrew Cowan Director
Version No. 2 – 16/12/2024	Tim Gleeson Town Planner	Andrew Cowan Director	
			

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STATEMENT OF ENVIRONMENTAL EFFECTS

Alterations and Additions Comprising the Conversion of Car Parking Spaces into Self-Storage Units
128 Milperra Road, Revesby

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2	Traffic and Parking Assessment	Transport and Traffic Planning Associates
3	BCA Capability Report	VPL Consulting
4	Owner's Consent	Storhub Self Storage
5	EDC Report	Napier & Blakeley
6	Clause 4.6 Variation Request	Willowtree Planning
7	Canterbury-Bankstown Development Control Plan 2023 Compliance Table	Willowtree Planning
8	Waste Management Plan	Foresight Environmental



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STATEMENT OF ENVIRONMENTAL EFFECTS

Alterations and Additions Comprising the Conversion of Car Parking Spaces into Self-Storage Units

128 Milperra Road, Revesby

PART A SUMMARY

1.1 INTRODUCTION

This Statement of Environmental Effects (SEE) has been prepared by Willowtree Planning Pty Ltd (Willowtree Planning) on behalf of The Trust Company (Australia) Limited as trustee for StorHub New South Wales Trust IV (the Applicant) and is submitted to Canterbury-Bankstown Council (Council) in support of a Development Application (DA) at 128 Milperra Road, Revesby (subject site), and legally defined as Lot 1 DP 1294099.

The DA seeks development consent for the proposed conversion of car parking spaces into self-storage units and associated works (the proposed development) as detailed in **PART C** of this SEE.

The subject site is zoned IN1 General Industrial pursuant to the *Canterbury-Bankstown Local Environmental Plan 2023* (CBLEP 2023), which is intended to:

- To provide a wide range of industrial and 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 promote a high standard of urban design and local amenity.

The proposed development is consistent with the zone objectives, as it pertains to the conversion of existing car parking spaces into self-storage units allowing for the extension of a storage premises use.

This SEE has been prepared pursuant to Section 4.12 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and Part 3 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation). Assessment against the relevant matters for consideration under Section 4.15(1) of the EP&A Act has also been carried out under **PART D** of this SEE.

This SEE describes the subject site and proposed development, provides relevant background information and responds to the proposed development in terms of the relevant matters set out in relevant legislation, environmental planning instruments and planning policies. The structure of the SEE is as follows:

- **PART A SUMMARY**
- **PART B SITE ANALYSIS**
- **PART C PROPOSED DEVELOPMENT**
- **PART D LEGISLATIVE AND POLICY FRAMEWORK**
- **PART E ENVIRONMENTAL ASSESSMENT**
- **PART F CONCLUSION**

Based on the assessment undertaken, it is recommended that favourable consideration to the approval of the DA be given.

1.2 REQUIREMENTS FOR CONCURRENCE / OTHER APPROVALS

The Proposal does not require the concurrence of any authorities.



STATEMENT OF ENVIRONMENTAL EFFECTS

Alterations and Additions Comprising the Conversion of Car Parking Spaces into Self-Storage Units
128 Milperra Road, Revesby

PART B SITE ANALYSIS

2.1 SITE LOCATION AND CHARACTERISTICS

The subject site is identified as 128 Milperra Road, Revesby containing the following land holding:

TABLE 1. SITE IDENTIFICATION		
Site Address	Legal Description(s)	Land Area (approx.)
128 Milperra Road, Revesby	Lot 1 DP 1294099	7,712m ²

The subject site is a corner allotment and exhibits a total area of approximately 7,712m² and is located in the City of Canterbury-Bankstown Local Government Area (LGA). The subject site features a primary frontage of 78.42m to Milperra Road, which is as a classified road. The subject site has a secondary street frontage of 118.7m to Violet Street. The subject site is zoned IN1 General Industrial pursuant to *Canterbury-Bankstown Local Environmental Plan 2023* (CBLEP 2023). The immediate site surroundings comprise of general industrial land uses, as well as wider R2 Low Density Residential. Bankstown Aerodrome and Bankstown Showground, zoned RE1 Public Recreational Zone and SP2 Infrastructure respectively are located on the northern side of Milperra Road.

In its existing state, the subject site contains an existing building comprising retail and storage premises uses. It is noted that the existing retail premises component of the existing building, located at ground floor level, was recently subject to a change of use to storage premises as part a Complying Development application (**CD-1333/2024**) approved on 23 October 2024..

Refer to **Figure 1** and **Figure 2** that illustrate the current site context and surrounding area below.



STATEMENT OF ENVIRONMENTAL EFFECTS

Alterations and Additions Comprising the Conversion of Car Parking Spaces into Self-Storage Units
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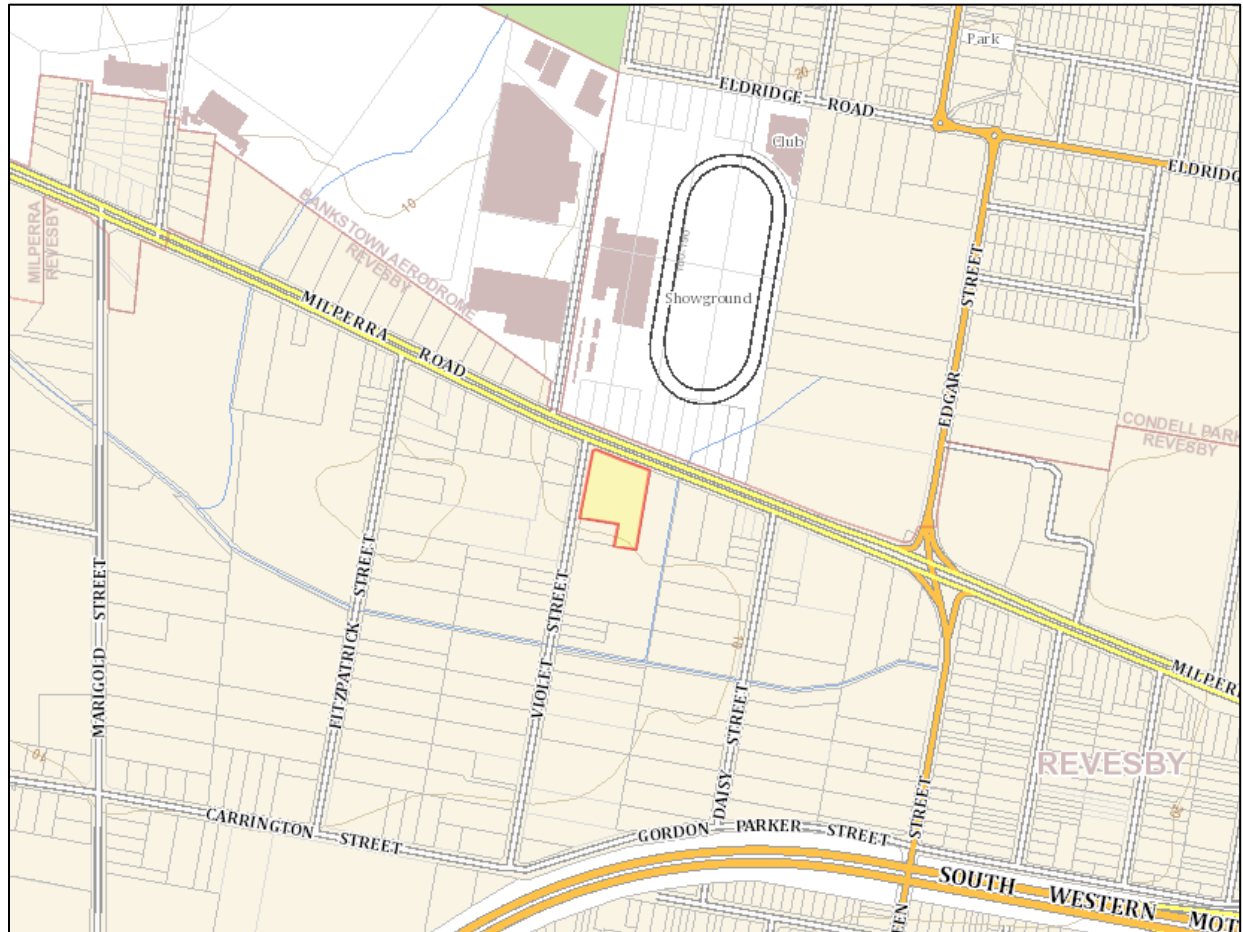


Figure 1. Cadastral Map (Source: SIX Maps, 2024)



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STATEMENT OF ENVIRONMENTAL EFFECTS

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Figure 2. Aerial Map (Source: Near Map, 2024)

2.2 SITE CONTEXT

The subject site is located within Revesby, which comprises part of the wider Canterbury-Bankstown Local government Area (LGA). The subject site is surrounded by a number of different uses, with the surrounding land predominantly made up of IN1 General Industrial zoning. Across Queen Street to the east and the South Western Highway to the south is the closest residential zoning, approximately 600m away.

The subject site is located approximately 4km from Bankstown Central and 21km from Sydney Central Business District. Access to the wider road network is afforded from Violet Street to the western boundary of the subject site, which shares connections to Milperra Road and the South Western Motorway. A number of bus services are available along Milperra Road to the northern boundary of the subject site.

2.3 DEVELOPMENT HISTORY

TABLE 2 below provides a summary of DAs and Complying Development Certificates (CDCs) pertaining to the subject site that have been determined or are under assessment:



STATEMENT OF ENVIRONMENTAL EFFECTS

Alterations and Additions Comprising the Conversion of Car Parking Spaces into Self-Storage Units
128 Milperra Road, Revesby

TABLE 2. PREVIOUS DEVELOPMENT CONSENT		
Application ID	Description	Determination
CD-1333/2024	Change of use of the ground floor retail tenancy of the existing storage building to 47 additional self-storage units and associated fitout/alterations.	Certified and Issued 23/10/2024
CD-825/2022	Construction of an industrial building comprising self-storage, office use and hardware store, along with associated car parking and landscaping.	Certified and Issued 16/08/2022
CDC-22021	Demolition of existing structure.	Certified and Issued 19/05/2022
DA-226/2021	Self-storage units, hardware and building supply unit and associated car parking.	Approved by LEC 14/01/2022
BA-491/1990	Alterations to existing dwelling.	Approved 03/04/1990
BA-2173/1989	Factory alterations.	Approved 04/01/1990
DA-301/1989	Additions to existing factory mezzanine floor and showroom.	Approved 11/07/1989

As discussed above, in its existing state, the subject site contains an existing building comprising retail and storage premises uses. It is noted that the existing retail premises component of the existing building, located at ground floor level was recently subject to a change of use to storage premises as part a Complying Development application (**CD-1333/2024**) approved on 23 October 2024.



STATEMENT OF ENVIRONMENTAL EFFECTS

Alterations and Additions Comprising the Conversion of Car Parking Spaces into Self-Storage Units
128 Milperra Road, Revesby

PART C PROPOSED DEVELOPMENT

3.1 DEVELOPMENT OVERVIEW

The proposal seeks to facilitate the expansion of a storage premises use on the subject site. The following objectives have been identified as forming the basis of the proposed development:

- Support the viable use of the subject site as a storage premises;
- Ensure minimal environmental and amenity impact; and
- Ensure the development is compatible with surrounding development and the local context.

The proposed development is therefore considered to meet the objectives set out above as it allows for a more viable operation of the development long term.

3.2 DEVELOPMENT STATISTICS

The proposed development includes the conversion of car parking spaces into self-storage units at ground floor level of the existing building. The proposed self-storage units will be used to facilitate the expansion of a storage premises use on the subject site.

Architectural Plans are provided as **Appendix 1**, which show the areas that are subject to the proposed alterations and additions and include those works as identified in **TABLE 3** below.

TABLE 3. DEVELOPMENT PARTICULARS	
Component	Proposed
Site Area	7,712m ²
Existing FSR	0.998:1
Proposed FSR	1.06:1
Building Height	No change
Earthworks	No change
Landscaping	No change
Tree Removal	No change
Estimated Development Cost (EDC)	\$167,231 plus GST

The proposed ground floor plan is included in **Figure 3** below.



Alterations and Additions Comprising the Conversion of Car Parking Spaces into Self-Storage Units
128 Milperra Road, Revesby



STATEMENT OF ENVIRONMENTAL EFFECTS

Alterations and Additions Comprising the Conversion of Car Parking Spaces into Self-Storage Units
128 Milperra Road, Revesby

PART D LEGISLATIVE AND POLICY FRAMEWORK

4.1 CONTROLS AND POLICY OVERVIEW

This Part of the SEE addresses and responds to the legislative and policy requirements relevant to the proposed development at the subject site in accordance with the EP&A Act.

The following instruments are relevant to the proposed development and have been considered in the preparation of this DA.

State Planning Context

- Environmental Planning and Assessment Act 1979
- Environmental Planning and Assessment Regulation 2021
- Water Management Act 2000
- State Environmental Planning Policy (Biodiversity and Conservation) 2021
- State Environmental Planning Policy (Resilience and Hazards) 2021
- State Environmental Planning Policy (Transport and Infrastructure) 2021
- State Environmental Planning Policy (Sustainable Buildings) 2022
- Canterbury-Bankstown Local Environmental Plan 2023

Local Planning Context

- Canterbury-Bankstown Development Control Plan 2023
- Canterbury Bankstown Local Infrastructure Contributions Plan 2022
- Housing and Productivity Contribution

4.2 STATE PLANNING CONTEXT

4.2.1 Environmental Planning and Assessment Act 1979

The EP&A Act is the principal planning and development legislation in NSW.

4.2.1.1 Section 4.15(1) of the EP&A Act – Considerations

Section 4.15(1) of the EP&A Act specifies the matters which a consent authority must consider when determining a DA. The relevant matters for consideration under Section 4.15(1) of the EP&A Act are provided in **TABLE 4** below.

TABLE 4. SECTION 4.15(1)(A) CONSIDERATIONS	
Section	Response
Section 4.15(1)(a)(i) any environmental planning instrument, and	The CBLEP 2023 is the relevant Environmental Planning Instrument (EPI) applying to the subject site, which is assessed in Section 4.3 of this SEE.
Section 4.15(1)(a)(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the	There are no applicable draft planning instruments for the subject site.



STATEMENT OF ENVIRONMENTAL EFFECTS

Alterations and Additions Comprising the Conversion of Car Parking Spaces into Self-Storage Units
128 Milperra Road, Revesby

TABLE 4. SECTION 4.15(1)(A) CONSIDERATIONS

Section	Response
consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and	
Section 4.15(1)(a)(iii) any development control plan, and	The <i>Canterbury-Bankstown Development Control Plan 2023</i> (CBDCP 2023) applies to the subject site and is addressed in Section 4.3.2 and Appendix 7 of this SEE.
Section 4.15(1)(a)(iia) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and	There are no voluntary planning agreements (VPA) applicable to the proposed development.
Section 4.15(1)(a)(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph),	The EP&A Regulation is addressed in Section 4.2.2 of this SEE.
Section 4.15(1)(b)-(c)	These matters are addressed in PART E of this SEE.

Pursuant to Section 4.5 of the EP&A Act, the consent authority for the proposed development is Canterbury-Bankstown Council.

4.2.2 Environmental Planning and Assessment Regulation 2021

The proposal has been prepared in accordance with the provisions of the EP&A Regulation. Division 1 of Part 3 of the EP&A Regulation stipulates how a DA must be “made”. This DA satisfies the relevant criteria of the Regulation as follows:

TABLE 5. HOW THE DA IS MADE

Considerations	Response
Division 1 - Making development applications	
<i>Section 23 - Persons who may make development applications</i>	
(1) A development application may be made by— (a) the owner of the land to which the development application relates, or (b) another person, with the consent of the owner of the land.	This DA is made by The Trust Company (Australia) Limited as trustee for StorHub New South Wales Trust IV. The owner of the land has provided consent in accordance with Clause 23(1) of the EP&A Regulation to allow for the DA to be made.
<i>Section 24 - Content of development applications</i>	
(1) A development application must— (a) be in the approved form, and (b) contain all the information and documents required by— (i) the approved form, and (ii) the Act or this Regulation, and	The DA includes all relevant information including details of the development, address and formal particulars, estimated cost of development, owner's consent, supporting documents including detailed plans and SEE. This DA is submitted via the NSW planning portal.



STATEMENT OF ENVIRONMENTAL EFFECTS

Alterations and Additions Comprising the Conversion of Car Parking Spaces into Self-Storage Units

128 Milperra Road, Revesby

TABLE 5. HOW THE DA IS MADE	
Considerations	Response
(c) be submitted on the NSW planning portal.	
Section 25 – Information about concurrence or approvals	
<p>A development application must contain the following information—</p> <ul style="list-style-type: none">(a) a list of the authorities –<ul style="list-style-type: none">(i) from which concurrence must be obtained before the development may lawfully be carried out, and(ii) from which concurrence would have been required but for the Act, section 4.13(2A) or 4.41,(b) a list of the approvals of the kind referred to in the Act, section 4.46(1) that must be obtained before the development may lawfully be carried out.	No approvals or referrals are required for this DA.
Section 35B – Additional requirements for development applications involving contravention of development standards	
<ul style="list-style-type: none">(1) This section applies to a development application that proposes, in accordance with a relevant EPI provision, development that contravenes a development standard imposed by any environmental planning instrument.(2) The development application must be accompanied by a document that sets out the grounds on which the applicant seeks to demonstrate that—<ul style="list-style-type: none">(a) compliance with the development standard is unreasonable or unnecessary in the circumstances, and(b) there are sufficient environmental planning grounds to justify the contravention of the development standard.(3) In this section— relevant EPI provision means—<ul style="list-style-type: none">(a) clause 4.6 of a local environmental plan that adopts the provisions of the Standard Instrument, or(b) an equivalent provision of another environmental planning instrument.	The proposed development contravenes the floor space ratio standard under Clause 4.4 of the CBLEP 2023. A Clause 4.6 variation request has been prepared to support this variation and is attached as Appendix 6 .



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Alterations and Additions Comprising the Conversion of Car Parking Spaces into Self-Storage Units
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4.2.3 Water Management Act 2000

The objective of the Water Management Act 2000 (WM Act) is the sustainable and integrated management of the state's water for the benefit of both present and future generations. The subject site is not found to be within 40m of a watercourse nor is the proposed development impacting groundwater and therefore, no further assessment against the WM Act is required.

4.2.4 State Environmental Planning Policy (Transport and Infrastructure) 2021

The *State Environmental Planning Policy (Biodiversity and Conservation) 2021* (Biodiversity and Conservation SEPP) contains planning provisions relating to:

- Planning rules and controls for the clearing of native vegetation in NSW on land zoned for urban and environmental purposes that is not linked to a development application.
- The land use planning and assessment framework for koala habitat.
- Provisions which establish a consistent and co-ordinated approach to environmental planning and assessment along the River Murray.
- Provisions seeking to protect and preserve bushland within public open space zones and reservations.
- Provisions which aim to prohibit canal estate development.
- Provisions to support the water quality objectives for the Sydney drinking water catchment.
- Provisions to protect the environment of the Hawkesbury-Nepean River system.
- Provisions to manage and improve environmental outcomes for Sydney Harbour and its tributaries.
- Provisions to manage and promote integrated catchment management policies along the Georges River and its tributaries.
- Provisions which seek to protect, conserve and manage the World Heritage listed Willandra Lakes property.

Of these, the proposed development must have regard to the following chapters:

Chapter 6 – Water Catchments

The subject site is located within the Georges River Catchment. The proposed development does not require earthworks and will be located internally within the existing built form, ensuring the proposed development will not have an adverse impact on the quality and quantity of ground water.

4.2.5 State Environmental Planning Policy (Resilience and Hazards) 2021

The *State Environmental Planning Policy (Resilience and Hazards) 2021* (Resilience and Hazards SEPP) contains planning provisions relating to:

- *land use planning within the coastal zone, in a manner consistent with the objects of the Coastal Management Act 2016.*
- *management of hazardous and offensive development.*
- *remediation of contaminated land and to minimise the risk of harm.*

In relation to the subject site, the following matters are highlighted.



STATEMENT OF ENVIRONMENTAL EFFECTS

Alterations and Additions Comprising the Conversion of Car Parking Spaces into Self-Storage Units
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Chapter 4 – Remediation of land

Under the provisions of Chapter 4 of the Resilience and Hazards SEPP, where a DA is made concerning land that is contaminated, the consent authority must not grant consent unless (as stipulated by Clause 4.6 of the SEPP):

- (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.*

There is no evidence of uses which may have resulted in contamination of the subject site. As such, no further investigation is required having regard to contamination regarding Resilience and Hazards SEPP.

4.2.6 State Environmental Planning Policy (Transport and Infrastructure) 2021

The *State Environment Planning Policy (Transport and Infrastructure) 2021* (T&I SEPP) aims to facilitate the effective delivery of infrastructure across NSW.

Clause 2.119 – Development with frontage to a classified road

Clause 2.119 of the T&I SEPP refers to development that has a frontage to a classified road. The subject site adjoins a classified road, which is identified as Milperra Road. Currently, there is no vehicular access provided from Milperra Road and the proposed development will have no impact.

Clause 2.122 – Traffic-Generating Development

Schedule 3 of the T&I SEPP outlines development that is defined as Traffic Generating Development, and therefore subject to a referral to Transport for NSW. The following applies to applications relating to storage premises.

Storage premises are not listed within Schedule 3 and therefore, fall into ‘any other purpose’ whereby a site with access to classified road or to road that connects to classified road (if access within 90m of connection, measured along alignment of connecting road) is traffic-generating development if it results in an additional 50 or more vehicles per hours, requiring referral to Transport for NSW.

As set out in the Traffic and Parking Assessment prepared by Transport and Traffic Planning Associates provided as **Appendix 2**, the proposed development will result in an additional maximum of 30 vehicle trips per hour. The proposal is therefore not considered to be Traffic Generating Development under the Transport and Infrastructure SEPP.

4.2.7 State Environmental Planning Policy (Sustainable Buildings) 2022

The *State Environmental Planning Policy (Sustainable Buildings) 2022* (Sustainable Buildings SEPP) encourages the design and delivery of more sustainable buildings across NSW. It sets sustainability



STATEMENT OF ENVIRONMENTAL EFFECTS

Alterations and Additions Comprising the Conversion of Car Parking Spaces into Self-Storage Units
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standards for both residential and non-residential development and contributes to NSW's target of achieving net zero by 2050.

Chapter 3 of the Sustainable Buildings SEPP applies to non-residential developments. The Sustainable Buildings SEPP is not applicable in accordance with clause 3.1, as the proposed development has an EDC of less than \$10 million.

4.3 LOCAL PLANNING CONTEXT

4.3.1 Canterbury-Bankstown Local Environmental Plan 2023

The CBLEP 2023 is the primary Environmental Planning Instrument that applies to the subject site.

The relevant provisions of CBLEP 2023 as they relate to the subject site are considered in the following subsections.

4.3.1.1 Zoning and Permissibility

The subject site is located within the IN1 General Industrial zone under CBLEP 2023 as shown in **Figure 4**.



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Alterations and Additions Comprising the Conversion of Car Parking Spaces into Self-Storage Units
128 Milperra Road, Revesby



Figure 4: Land Zoning Map (Source: NSW Legislation, 2024)

The land use table for the IN1 zone is reproduced in **TABLE 6** below:

TABLE 6. ZONE OBJECTIVES AND PERMITTED LAND USE	
Requirement	Application to the Site
IN1 General Industrial	
1. Zone Objectives	<ul style="list-style-type: none">To provide a wide range of industrial and 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 promote a high standard of urban design and local amenity.



STATEMENT OF ENVIRONMENTAL EFFECTS

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2. Permitted without Consent	<i>Nil</i>
3. Permitted with Consent	<i>Agricultural produce industries; Building identification signs; Business identification signs; Depots; Freight transport facilities; Garden centres; General industries; Hardware and building supplies; Industrial training facilities; Light industries; Neighbourhood shops; Oyster aquaculture; Places of public worship; Restaurants or cafes; Roads; Take away food and drink premises; Tank-based aquaculture; Vehicle sales or hire premises; Warehouse or distribution centres; Any other development not specified in item 2 or 4</i>
4. Prohibited	<i>Agriculture; Air transport facilities; Airstrips; Amusement centres; Animal boarding or training establishments; Boat launching ramps; Boat sheds; Camping grounds; Caravan parks; Cemeteries; Charter and tourism boating facilities; Commercial premises; Community facilities; Correctional centres; Early education and care facilities; Eco-tourist facilities; Educational establishments; Entertainment facilities; Exhibition homes; Exhibition villages; Extractive industries; Farm buildings; Forestry; Function centres; Health services facilities; Heavy industrial storage establishments; Helipads; Highway service centres; Home businesses; Home occupations; Home occupations (sex services); Industries; Information and education facilities; Jetties; Marinas; Mooring pens; Moorings; Open cut mining; Passenger transport facilities; Pond-based aquaculture; Port facilities; Public administration buildings; Recreation areas; Recreation facilities (indoor); Recreation facilities (major); Recreation facilities (outdoor); Registered clubs; Research stations; Residential accommodation; Respite day care centres; Restricted premises; Rural industries; Sewerage systems; Sex services premises; Signage; Tourist and visitor accommodation; Veterinary hospitals; Water recreation structures; Water supply systems; Wharf or boating facilities; Wholesale supplies</i>

The Dictionary accompanying CBLEP 2023 defines storage premises as follows:

storage premises means a building or place used for the storage of goods, materials, plant or machinery for commercial purposes and where the storage is not ancillary to any industry, business premises or retail premises on the same parcel of land, and includes self-storage units, but does not include a heavy industrial storage establishment or a warehouse or distribution centre.

Self-storage units are also defined as follows:

self-storage units means premises that consist of individual enclosed compartments for storing goods or materials (other than hazardous or offensive goods or materials).



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The existing development consists of an approved storage premises use and retail premises use, approved under **CD-825/2022**. The existing retail premises use was recently subject to a change of use to storage premises as part a Complying Development application (**CD-1333/2024**) approved on 23 October 2024. Storage premises are permitted with consent under the CBLEP 2023 and align with the objectives of the IN1 zone.

4.3.1.2 Development Standards

TABLE 7 outlines the developments consistency and compliance with the relevant development standards and controls under CBLEP 2023.

TABLE 7. CBLEP 2023 DEVELOPMENT STANDARDS	
Clause	Comment
Clause 4.1 – Minimum Subdivision Lot Size	The subject site is subject to a minimum subdivision lot size development standard of 1,500m ² . However, the proposed development does not involve any subdivision of the land.
Clause 4.3 – Height of Buildings	The subject site is not subject to a maximum building height development standard. The proposed alterations and additions do not involve any alterations to the building height of the existing building.
Clause 4.4 – Floor Space Ratio	<p>The subject site is subject to a maximum floor space ratio (FSR) development standard of 1:1. The proposed development results in an FSR of 1.06:1, exceeding the permitted FSR by 6.7%.</p> <p>The proposed increase is not considered to be significant, adding 536m² to the existing gross floor area (GFA), resulting in an additional 0.06 to the existing FSR.</p> <p>A written variation request under Clause 4.6 has been prepared and is appended as Appendix 6 to this SEE.</p>
Clause 4.6 – Exceptions to development standards	<p>Where variations to development standards are sought, Clause 4.6 offers a mechanism to vary such development standards.</p> <p>The proposed development seeks to vary the FSR development standard prescribed by Clause 4.4 of CBLEP 2023.</p> <p>A written requests under Clause 4.6 of CBLEP 2023 has been prepared in support of the variation to the development standards and is provided at Appendix 6.</p>



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Clause 5.10 – Heritage	There are no identified heritage items on the subject site and the subject site is not located within a heritage conservation area. Therefore, no further assessment is warranted.
Clause 5.21 – Flood Planning	The subject site, or part of the subject site, is within the flood planning area (FPA) and consequently the probable maximum flood (PMF). As part of previous Civil Engineering investigations on the subject site for the approved built form, the built form is not located in a flood storage area, floodway, flow path, high hazards area or high risk area. Therefore, given the proposed development relates works located within the existing built form, further flooding investigations are not considered necessary.
Clause 6.1 – Acid Sulfate Soils	The subject site is affected by Class 5 Acid Sulfate Soils, pursuant to Clause 6.1 of the CBLEP 2023. There is no development proposed below ground level and therefore, further consideration is not required.

4.3.2 Canterbury-Bankstown Development Control Plan 2023

The CBDCP 2023 provides detailed planning and design guidelines to support the planning controls of the CBLEP 2023.

An assessment of the proposal against the relevant sections of the CBDCP 2023 is provided at **Appendix 7**.

4.3.3 Contributions Plan

The subject site is subject to the provisions of the *Canterbury Bankstown Local Infrastructure Contributions Plan 2022* and the Housing and Productivity Contribution. It is understood that any applicable contributions will be imposed as conditions of any consent granted.

4.4 DRAFT ENVIRONMENTAL PLANNING INSTRUMENTS

No Draft Environmental Planning Instruments apply to the subject site.



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PART E LIKELY IMPACTS OF THE DEVELOPMENT

This section identifies and assesses the impacts of the development with specific reference to the heads of consideration under Section 4.15(1) of the EP&A Act.

5.1 CONTEXT AND SETTING

The proposed development has been designed to facilitate and enhance the approved warehouse and storage development. The proposal will promote the efficient and sustainable use of land designated for an industrial purpose, via adherence to the provisions and overarching aims and land use objectives set out within the CBLEP 2023.

The proposed works will be consistent with the that of the surrounding development whilst remaining in keeping with the desired streetscape amenity. The proposed development will retain the visual interest of the subject site and is not anticipated to result in any adverse impacts on the visual amenity of the surrounding streetscape or contribute to any unnecessary visual clutter.

5.2 BUILT FORM

There are no proposed changes to the existing built form. The proposed development is consistent with the zone objectives, as it pertains to the conversion of existing car parking spaces into self-storage units allowing for the extension of a storage premises use. The existing building height and landscaping will remain unchanged as part of the proposed development with an increase to the GFA of the built form proposed. The increase in GFA will be contained wholly within the existing built form and a written request under Clause 4.6 of CBLEP 2023 has been prepared in support of the variation to the development standards and is provided at **Appendix 6**.

5.3 TRAFFIC & TRANSPORT

A Traffic and Parking Assessment prepared by Transport and Traffic Planning Associates is provided as **Appendix 2**. The purpose of the Traffic and Parking Assessment is to assess the adequacy of the proposed parking provision and to assess the potential traffic implications.

Traffic Generation

The Traffic and Parking Assessment undertook an assessment of the potential traffic generation as a result of the proposed development. The former retail use of 1,093m² would generate some 33 vehicle trips per hour. The projected change of generated vehicle trips will be less than that of the previous development circumstances.

Car Parking Provision



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The requirement for the office use of 249m² in accordance with Council's DCP is 6.2 spaces while a guide to the parking requirement for Self-Storage use is provided by the Self-Storage Association of Australia Parking and Parking Study (Stantec, 2022/ 2023). The criteria in that document concludes that a Self-Storage facility exceeding 6,000m² requires a parking provision of 7 spaces. Thus, the assessed total required parking provision for the development on the central and northern part of the subject site is some 13 car spaces and it is proposed to provide a total of 27 spaces including 1 accessible space in satisfaction of the requirements.

5.4 FLOODING

The subject site, or part of the subject site, is within the flood planning area (FPA) and consequently the probable maximum flood (PMF). As part of previous Civil Engineering investigations on the subject site for the approved built form, the built form is not located in a flood storage area, floodway, flow path, high hazards area or high risk area. Therefore, given the proposed development relates works located within the existing built form, further flooding investigations are not considered necessary.

5.5 BUILDING CODE OF AUSTRALIA

The proposal has been designed to be capable of achieving compliance with Building Code of Australia (BCA) and relevant adopted standards. The BCA Assessment Report is provided at **Appendix 3** of this SEE for further reference.

5.6 WASTE

The proposed development would not alter the existing waste management systems and operations at the subject site. A Construction and Demolition Waste Management Plan will be provided in accordance with CBDP 2023 by the Head Contractor prior to commencement of construction, which will provide suitable waste management measures during demolition and construction.

5.7 HERITAGE

The subject site is not a state or local heritage item nor is it located on land identified as a heritage item.

Given the location of the proposed development and nature of the works, being the conversion of car parking spaces into self-storage units, the proposed development would not result in any adverse impacts to any existing heritage items.

5.8 CONSTRUCTION

All works on the subject site will be carried out in accordance with Chapter 3 – General Requirements of CBDP 2023 and the conditional requirements of any consent issued. Appropriate measures will be undertaken to mitigate any construction impacts.

5.9 SUBMISSIONS

No submissions have been received in relation to the proposed development; however, the applicant is willing to address any submissions, should they be received by Council.



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5.10 THE PUBLIC INTEREST

The proposed development is consistent with the relevant planning framework, existing development on the subject site and the surrounding area. No matters of concern have been highlighted that would indicate the proposal is contrary to the public interest.



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PART F CONCLUSION

The purpose of this SEE has been to present the proposed conversion of car parking spaces into self-storage units for 128 Milperra Road, Revesby and to assess its potential impacts having regards to Section 4.15(1) of the EP&A Act.

The assessment finds that the proposed development is consistent with the objectives and controls of the relevant instruments and policies in place. No significant adverse environmental, economic or social impacts have been identified as likely to arise from the proposed development. Rather, the proposed development would provide for positive impacts, including facilitating the efficient and suitable development of land zoned for industrial purposes.

The proposal has been prepared after taking into consideration the following key issues:

- The development history of the subject site;
- The context of the subject site and locality;
- The relevant heads of consideration under Section 4.15(1) of the EP&A Act; and
- The aims, objectives and provisions of the relevant statutory and non-statutory planning instruments.

The proposed development is considered to warrant a favourable determination for the following reasons:

- The proposed development is permissible with consent in the IN1 zone; and
- The proposed development is consistent with the relevant provisions of CBLEP 2023 and CBDCEP 2023.

The proposed development is permissible within the zone and is compatible with the zone objectives. As stipulated previously in this SEE, the matters for consideration under Section 4.15(1) of the EP&A Act have been satisfactorily addressed.

In light of the merits of the proposed development and in absence of any significant environmental impact, the proposed development warrants support by Council.

