



Statement of Environmental Effects

Accompanying a development application for the proposed
Change of Use, Refurbishments and Alterations

11 - 17 Marco Avenue
Revesby NSW 2212
Lots 12, 13, 14, & 15 DP 35611

22nd May 2025

Prepared for submission to
Canterbury Bankstown Council

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1. Introduction

This statement of environmental effects has been prepared by Highfield Property Australia to accompany a development application for the proposed change of use, refurbishments and alterations to an existing commercial building at 11 - 17 Marco Avenue, Revesby NSW 2212. The application is being lodged by Highfield Property Australia, pursuant to Clause 4.12 of the Environmental Planning and Assessment Act 1979.

This report is intended to assist Canterbury-Bankstown Council in its assessment of the development application and includes an evaluation of the proposal against the provisions of the following state and local planning policies:

- Section 4.15 of the Environmental Planning and Assessment Act 1979 (as amended);
- State Environmental Planning Policy (Industry and Employment) 2021;
- Canterbury-Bankstown Local Environmental Plan 2023;
- Canterbury-Bankstown Development Control Plan 2023; and
- Canterbury-Bankstown Connective City 2036 strategy.

This proposal seeks approval for a partial change of use and internal layout specific to the ground floor, including the creation of five (5) separate tenancies, closure of the existing loading dock with relocation of this function to the rooftop car park, refurbishment and upgrade of the building facade, and installation of additional building signage.

This statement has been prepared having regard to the following documentation:

- Architectural plans prepared by Highfield Property Australia;
- 3D Elevations by Highfield Property Australia; and
- BCA Report prepared by EBS Consultants.

2. Site description and analysis

2.1 Location and property description

The subject site is located on the southern side of Marco Avenue, Revesby. The site is rectangular in shape and comprises Lots 12, 13, 14 and 15 in Deposited Plan 35611, otherwise known as 11 - 17 Marco Avenue, Revesby NSW 2212. The site has triple frontage with the primary customer and vehicular access from Marco Avenue and the eastern and southern boundaries fronting the adjoining council car park and the central plaza alongside Abel Reserve. Refer to Figure 1 below for the Location Map.

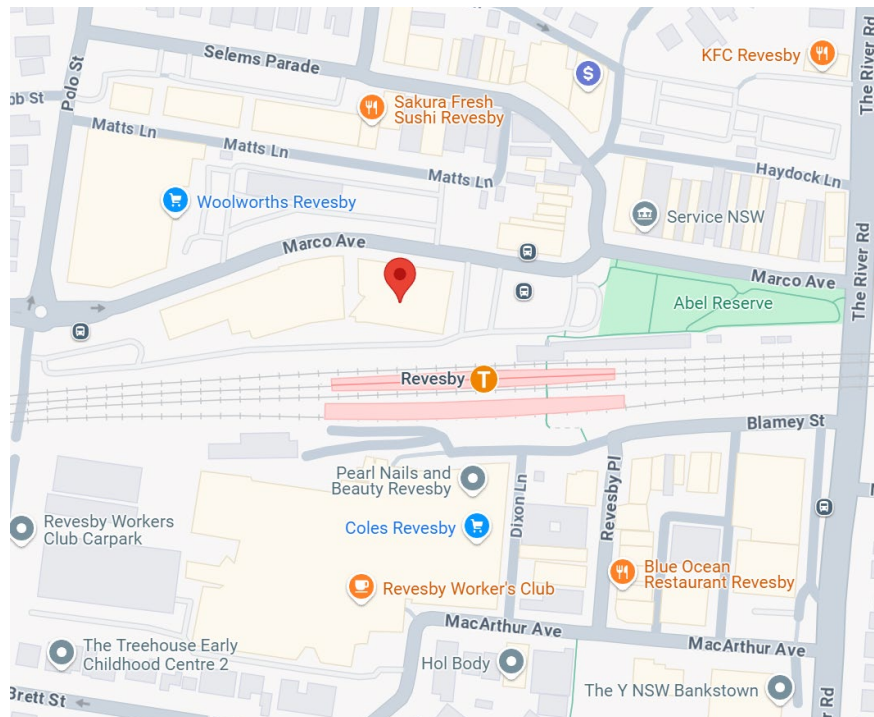


Figure 1: Location Map

2.2 Site characteristics

The property currently stands as a 2-storey building with a total site area of 2,192sqm and comprises of the following characteristics:

Ground Floor

The ground floor of the building is currently vacant but has previously been occupied and approved for supermarket and retail uses with associated amenities; dual truck loading dock fronting Marco Avenue and vehicular access to the first floor car park.

Level One

Level one of the building is a rooftop car park with 61 car spaces and direct lift access to the ground floor.

The existing building structure was originally approved in 1972 (B.A.2564/72) and constructed thereabouts as a large Woolworths supermarket and has had subsequent approvals for alterations, refurbishments and the like, notably DA 2137/1998.

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Figure 2: Photograph of subject building facing north towards Marco Avenue



Figure 3: Photograph of subject building facing east towards council car park



Figure 4: Photograph of subject building facing south east towards Revesby railway station



Figure 5: Photograph of subject building – rooftop car park

2.3 Surrounding development

The subject site is in the Northern Commercial Core of the Revesby town centre and is considered a Prominent Site within the councils' development controls. The site is centrally located in the heart of the town centre, adjoining the central plaza which is straddled by Revesby railway station and the main bus stop, refer to Figure 6.

The broader commercial area has a mix of small and large format retail (refer to Figure 8 and 9), including Woolworths supermarket, food and beverage stores, professional and personal services, banking and governments services. To the west of this site is a mixed use building with ground floor retail and three levels of residential apartments (refer to Figure 7).

The area is undergoing change as encouraged by Council's policies to a mixed commercial and residential form of development. The town centre has many ageing buildings which require refurbishment to improve the streetscape which in turn will attract quality business owners that can operate thriving businesses which can generate more jobs for the Revesby community.

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Figure 6: Site Plan



Figure 7: Neighbouring property to the south - mixed use development



Figure 8: Directly opposite subject building on Marco Avenue

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Figure 9: Diagonally opposite subject building on Marco Avenue

3. Details of proposal

3.1 Proposed works

This Development Application seeks consent for the partial change of use, the refurbishment and alterations to an existing building at 11-17 Marco Avenue Revesby NSW 2212.

The partial change of use and layout is specific to the ground floor. This will involve the creation of five (5) tenancies as set out in the table below.

Shop Number	Proposed Use	Gross Floor Area (sqm)
1	Recreation Facility – Indoor	717
2	Retail	98
3	Retail	84
4	Retail	199
5	Medical Centre	750

The total proposed gross floor area is 1,848sqm. Refer to plan P101 for the layout details.

The intent is to refurbish both the interior and exterior finishes of the building to beautify the streetscape and to uplift the overall retail experience in the Revesby town centre. This proposal intends to deliver a more diverse retail/commercial offering to this locality.

The proposed scope of works will include:

- New shopfronts
- Part new and part refurbished awnings across all shopfronts to provide for all weather protection
- Cladding of above awning areas of northern elevation and painting to rest of building exterior
- Relocate loading dock to the rooftop car park
- Install internal perimeter tenancy walls

The new exterior building signage is in the zones nominated in the attached plans.

As the proposed uses do not require intense loading facilities as the existing dual semi trailer truck loading dock in the existing loading dock, it is proposed that the loading dock be relocated to the existing 61st car parking spot on Level 1 and the existing loading dock be resumed as space in Shop 5.

The new loading bay facility will have access to the shops on the ground floor via a lift. The lift is large enough to operate as a goods and passenger lift and has done so since its installation.

4. Environmental assessment

The proposal has been assessed with regards to the relevant heads of consideration under Section 4.15 of the Environmental Planning and Assessment Act 1979 (as amended).

4.1 State Environmental Planning Policies (SEPP's)

The following SEPP policy is applicable for the subject proposal.

State Environmental Planning Policy (Industry and Employment) 2021

Subdivision 2 Development adjacent to pipeline corridors

As the proposed building refurbishment works are located adjacent to a major gas pipeline corridor, formal written notice was provided to the pipeline operator, APA Group, on 24 March 2025 (refer to Annexure 2). This notice outlined the scope of the proposed works and included plans for assessing any potential risks.

APA Group responded in writing on 3 April 2025, confirming that they have no objection to the proposed works, subject to the inclusion of the specific conditions listed below.

- Buildings, structures, roadway, pavement, pipeline, cable, fence or any other improvement on or under the land within the gas transmission pipeline easement must not be constructed without prior (APT Petroleum Pipelines Pty Ltd). No structure or vegetation will be permitted on the easement that prohibits maintenance of line of sight along the pipeline easement.
- Prior to the commencement of any works within the gas transmission pipeline easement, the proponent must enter a Third Party Works Authorisation agreement with the pipeline licensee/operator (APT Petroleum Pipelines Pty Ltd). Works within the easement must comply with any conditions attached to a third party works approval.
- No stockpiles or storage of material is to be stored on the gas pipeline easement at any time.
- All plans which include the area of the gas pipeline must have the pipeline easement clearly identified with hatching. The area must also be clearly labelled as '*high pressure gas pipeline right of way – no works to occur without the prior authorisation of the pipeline operator*'.

4.2 Canterbury Bankstown Local Environmental Plan 2023

Zoning

The subject land is zoned E1 – Local Centre.

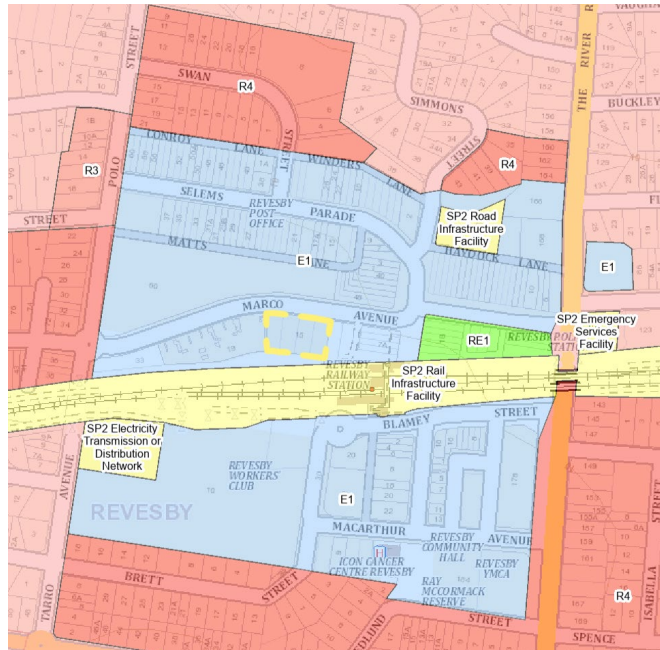


Figure 10: Zoning Map – NSW ePlanning Portal – Accessed May 2025

Objective of Zone

- To provide a range of retail, business and community uses that serve the needs of people who live in, work in or visit the area.
- To encourage investment in local commercial development that generates employment opportunities and economic growth.
- To enable residential development that contributes to a vibrant and active local centre and is consistent with the Council's strategic planning for residential development in the area.
- To encourage business, retail, community and other non-residential land uses on the ground floor of buildings.
- To encourage employment opportunities in accessible locations.
- To maximise public transport patronage and encourage walking and cycling.
- To promote a high standard of urban design and local amenity. To ensure that new development provides diverse and active street frontages to attract pedestrian traffic and to contribute to vibrant, diverse and functional streets and public spaces.
- The proposed uses of the subject premises are listed in the table below.

Shop Number	Proposed Use	Permissibility
1	Recreation Facility – Indoor	Permitted with consent
2	Retail	Permitted with consent
3	Retail	Permitted with consent
4	Retail	Permitted with consent
5	Medical Centre	Permitted with consent

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All proposed uses adequately meet the prescribed objectives of the E1 - Local Centre land use zone. The proposal represents perfectly suitable uses in the local centre that will serve the daily needs of people living in, working in, and visiting the locality.

The proposed land uses will utilise an existing building of appropriate scale that will integrate well with the surrounding land uses and contribute to the overall vitality of the local area. The subject proposal will further promote and encourage numerous employment opportunities for a number of people over the time of its operation including the fit-out, ongoing maintenance, security and day to day operations without compromising the amenity of other surrounding land uses and/or zones.

Part 4.3 Height of buildings

The proposal does not seek to amend the existing building height of 14 metres. The current permissible maximum building height is 40 metres.

Part 4.4 Floor space ratio

The proposed gross floor area is 1,905 square metres representing a floor space ratio of 0.87:1, adhering to the floor space ratio requirement of 3.5:1 as well as the required car parking amenity.

Part 5.10 Heritage Conservation

The provisions contained in this Part relate to the protection of heritage items, conservation areas, archaeological and Aboriginal heritage significance for both the built and natural environment. The proposed development will not have any detrimental impact in this regard given the site does not contain a heritage item, it is not located in close proximity to one nor is it within a heritage conservation area. In addition, the site is not known to contain any archaeological or Aboriginal heritage. As a consequence, the subject proposal is considered satisfactory in this regard.

4.3 Canterbury Bankstown Development Control Plan 2023

It is important to note that this application relates to a partial change of use and a building refurbishment.

Since the proposal only relates to the items set out above, specifications on built form and site planning considerations with regard to the exterior building envelope, such as setting, setbacks, views, vistas, soil management, etc. are not considered here.

The following is an assessment against the relevant provisions contained within the Canterbury Bankstown Development Control Plan 2023 (CBDCP 2023). The core of the strategy is to encourage development that contributes to the prosperity of the Canterbury-Bankstown community and enhances the surrounding environment by making it safe and secure.

Chapter 3.2 Parking

The following table demonstrates the subject proposal off-street parking requirements will be met by the 60 car spaces previously approved by council for this site and the existing surplus space is proposed to be utilised as a loading facility.

Premises	Proposed Land Use	Gross Floor Area (sqm)	CBDCP 2023 Car Space Requirement	Number of Car Spaces Required
1	Recreation Facility – Indoor (gymnasium)	717	3 car spaces per 100sqm GFA	21.5
2, 3 and 4	Retail	381	1 car space per 40sqm GFA	9.5
5	Medical Centre	750	1 car space per 25sqm GFA	30
		1,848		60

Chapter 3.3 Waste Management

In accordance with Section 4, a waste storage system has been designed to accommodate the following waste requirements.

- Medical centre, Retail and Recreation Facility - Indoor (gymnasium) businesses;
- volume of waste generated by each tenant;
- number of required bins and their size;
- recycling needs; and
- waste and collection frequencies.

The waste room will accommodate the needs for waste separation and bin storage which is to be accessible by all tenants. The same is to be replicated within each tenancy for their day to day operational requirements.

Chapter 3.4 Sustainable Development

The proposal is for an existing development which is under 5,000sqm gross floor area, therefore there are no applicable sustainability requirements.

Chapter 3.6 Signs

The proposed business identification signage is detailed in the attached architectural plans P201, P202 and summarised in the table below.

Elevation	Existing Signage Zones	Additional Signage Zones
Northern	- S1/A, S2/A, S3/A, S4/A and S5/A. - S1/FB and S5/FB. - A1, A2, A3 and A4.	- S2/FB, S3/FB, S4/FB and S6/FB. - A5.
Eastern	- S1/B, S2/B, S3/B, S4/B and S5/B.	- S1, S2, S3, S4, and S5. - S1/SB (above shopfront)
Southern	- S1/RB.	- S5/RB - S1/A, S2/A, S3/A, S4/A and S5/A
Western	Nil.	Nil.

The zones of the proposed business identification signage is considered to be appropriate given that the proposed building signage is in zones previously approved by earlier Development Applications and the individual premises signage is in accordance with the requirements set out in the Canterbury Bankstown Development Control Plan for signs in B2 zoning.

The size and design of the signage is considered to be in scale, proportion and character with the subject building, surrounding area and completely consistent with the signage previously utilised within the locality.

The subject proposal will also not dominate the skyline, as it is not to be installed above the existing height of the building. Similarly, no sign proposed will detract from the quality of the vista and will not block views to any other signs in the area while being non-competitive to the surrounding commercial premises.

All signage proposed and installed will be kept and maintained to the satisfaction of the local authority.

Chapter 6.1 Strategic Centres – General Requirements

Section 2 - Active Street Frontages

The provisions contained within this Part seek to encourage active street frontages. Specifically, the objectives seek to achieve the following outcomes:

- To ensure development integrates with the public domain and contributes to an active pedestrian orientated environment and passive surveillance;
- To strengthen the pedestrian amenity by requiring good physical and visual connections between buildings and the street;
- To provide a strong street address;
- To integrate site facilities with the building form to avoid adverse visual impacts on the public domain; and
- To make vehicle access to buildings more compatible with pedestrian and cyclist movements and the public domain.

To achieve the above objectives, the proposed development will further enhance the existing building by refreshing the building exterior finishes, introducing additional shopfronts and uses, and providing building users with equitable access directly from the street and via the lift from the rooftop car park. All customer and delivery vehicle access is via the existing ramp off Marco Avenue.

The above demonstrates that the proposal is consistent and meets the provisions contained under Section 2, Chapter 6.1 of the DCP.

Section 3 – Facade Design

To further enhance the existing building facade and achieve a high quality outcome, the proposal is to close the existing loading dock as there is no longer a requirement for semi-trailer truck deliveries, which in turn will improve the safety of pedestrian and vehicular traffic on Marco Avenue by removing the needs for semi-trailers to reverse into the subject building.

In place of the loading dock will be a new premises which will continue the existing building facade design by creating another active shopfront as set out in the attached plans.

The above demonstrates that the proposal is consistent and meets the provisions contained under Section 3, Chapter 6.1 of the DCP.

Section 5 - Roof Design

The proposal does not include any modifications to the existing roof.

The above demonstrates that the proposal is consistent and meets the provisions contained under Section 5, Chapter 6.1 of the DCP.

Section 6 – Materials and Finishes

This proposal outlines the introduction of a refined combination of materials and finishes to the building's exterior, aimed at enhancing the existing structure, contributing positively to the surrounding streetscape, and addressing environmental considerations such as urban heat mitigation.

The proposed facade improvements include the following elements:

- Painted brickwork and concrete
All existing brickwork will be painted in Dulux Monument and Dulux Terrace White to create a modern, cohesive appearance.
- Cladding
Enseam cladding or similar alternative, will be installed above the shopfront awnings and finished in Dulux Shale Grey to add visual interest and texture.
- Aluminium and glazed shopfronts
The shopfronts will be powder-coated aluminium framing with integrated glazing. The aluminium framing will be finished in Interpon Sable Bass powder coat, offering a streamlined, contemporary look.
- Tiled Structural Columns

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The structural columns separating individual shopfronts will be finished with high quality tiles in a colour closely matching Dulux Monument, maintaining consistency across the facade while adding texture and durability.

For further detail, please refer to the computer generated renderings and architectural plans attached to this report.

The above demonstrates that the proposal is consistent and meets the provisions contained under Section 6, Chapter 6.1 of the DCP.

Section 7 - Awning Design

The proposal seeks to extend the existing shopfront awning along Marco Avenue to incorporate the new 'Shop 5', as outlined in the attached plans. The goal is to ensure continuity and consistency across all shopfronts by seamlessly integrating the awning design with the existing building structure and the street's natural gradient. Additionally, lighting will be installed beneath the awning to enhance visibility and aesthetic appeal.

The above demonstrates that the proposal is consistent and meets the provisions contained under Section 7, Chapter 6.1 of the DCP.

Chapter 7.1 Commercial Centres – General Requirements

The proposal to amend the layout to create five premises with glazed shop fronts facing onto the bustling Marco Avenue, will activate the street front to provide an enhanced experience for pedestrians by creating physical and visual connections between the building and street. The streetscape will be further enhanced by the removal of the current loading dock which accommodates access for two semi trailer tucks via Marco Avenue and converting this space into premises.

The building façade is proposed to be refreshed and upgraded to represent a new, modern building which can contribute to the character of the local centre.

The existing awning is proposed to be extended to enable continuity and consistency with the updated building facade, whilst also providing all-weather protection for pedestrians, as outlined in the supporting plans.

Chapter 7.2 Commercial Centres – City West

Section 11 refers to Revesby as a local centre providing urban and community services for a large population within the council's Connective City 2036 strategy.

The subject site is situated within the Northern Commercial Core which is said to be the heart of the local centre. Marco Avenue is specifically identified as one of the main streets of Revesby with a focus to activate street frontages to create a more vibrant streetscape which encourages activity at all times of the day.

The site is adjacent to the central plaza of the local centre which has direct pedestrian connection to Revesby Railway Station and the council car park.

5. Section 4.15 of the Environmental Planning and Assessment Act 1979 – other considerations

This section assesses the impact of the subject proposal in relation to the following matters:

- Applicable planning agreements;
- Site Services;
- Suitability of the site for development;
- Traffic;
- Public interest; and
- Socio-economic impact.

Applicable planning agreements

There are no planning agreements that have been entered into or any draft planning agreement that a developer has offered to enter into under section 93F that impacts the subject property.

Site services

The site will be adequately served with energy, electricity, water, telephone services and waste management. The owner will further endeavour to consult where required with appropriate and registered service providers and consultants as to ensure the uninterrupted and sustainable provision of all associated services.

Suitability of the site for development

The proposed development is suitable for this site for the following reasons:

- The proposed uses of the site as a Recreation Facility – Indoor (Gymnasium), Retail and Medical Centre adequately meets the objectives of the E1 – Local Centre land use zone and adheres to the principles envisaged for the locality in terms of zoning and strategic objectives.
- The proposed land use is considered to complement surrounding land uses, businesses and benefit the local community.
- The size and layout of the premises are appropriate for the proposal and can readily be repurposed should the development ever have a change of land use in the future.
- This site is in the most prominent location within the Revesby local centre, positioned at the doorstep of the railway station, council car park, providing convenient accessibility.
- The site is already adequately equipped with all required services and the proposed development would not come at any additional expense to the environment and/or the local Council; and
- The proposed land uses and building works will make a significant contribution in improving the overall streetscape and amenity of an otherwise poorly utilised prominent commercial building.

Traffic

The refurbishment and reopening of the existing rooftop car park will significantly enhance customer accessibility to the building's premises, while also alleviating parking congestion on surrounding streets.

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The closure of the current loading dock will further mitigate the impact of semi-trailer trucks obstructing traffic on Marco Avenue, ensuring smoother entry and exit from the site. The new loading facility, located on the rooftop car park, will consolidate all operational activity in one area, reducing pedestrian risks and improving the visual appeal of the site.

Additionally, with the removal of the loading dock, there is an opportunity for the council to introduce a new 'drop-off' zone in front of the proposed medical centre. This facility will be accessible to patients of both the new medical centre and the adjacent large-format medical centre, offering a safer and more convenient means of access, particularly for vulnerable members of the community.

Public interest

The proposed land uses are expected to significantly enhance the variety of retail, recreational, and medical services available to residents, local workers, and visitors, fostering a healthier lifestyle and promoting social interaction in a convenient location. Additionally, the proposal will contribute to the overall tenancy mix, enriching the local experience and making this area of Revesby more attractive to the community and visitors alike.

It is anticipated that the proposal will not result in any adverse impacts on surrounding residential, commercial, retail, industrial, or business land uses in terms of safety, security, traffic, parking, or noise levels. Rather, the proposed development is expected to provide positive social and economic benefits, aligning with the broader vision for the local area.

Socio-economic impact

The establishment of the proposed land uses will provide the local community with an enhanced variety of retail, recreational facilities and medical services, providing the opportunity for the community to access a healthier lifestyle, encourage more social interaction and the ability to shop around for more affordable prices at a convenient location. Additionally, the development will complement the existing tenancy mix in the local centre, while also contributing to the economic vitality of the area.

It is anticipated that the proposal will not have any adverse impact on socio-economic amenity, but rather will promote values of inclusion, public safety, and equality.

The proposed facility is expected to make a positive contribution to the social development of the community. Furthermore, the development will create numerous employment opportunities throughout its operational lifespan, including roles in fit-out, ongoing maintenance, security, and day-to-day operations, all without detracting from the amenity of surrounding land uses.

6. Conclusion

In conclusion, this proposal is deemed to be an appropriate development for the site, with a positive impact on the surrounding local area.

The proposal, as submitted, can be supported based on the following key considerations:

- The development represents a permissible land use and aligns with the development objectives outlined for the B2 – Local Centre zone;
- The proposal complies with relevant legislative and planning frameworks, including the Environmental Planning and Assessment Act 1979, the Canterbury Bankstown Local Environmental Plan (LEP) 2023, the Canterbury Bankstown Development Control Plan (DCP) 2023, and the Canterbury Bankstown Connective City 2036 Strategy;
- The development makes efficient use of a prominent, existing, and underutilised commercial building, without undermining its potential for future commercial activity.

Given the points outlined above, the proposed development is considered suitable, and approval is recommended.

Best Regards,



George Scoufis
Director
Highfield Property Australia
M: 0414 505 415
E: gscoufis@highfieldproperty.com.au

Annexure 1 - Recommendations to Council

Designated accessible drop-off and pick-up zone

Currently, the kerbside adjacent to the subject buildings' loading dock, car park driveway, and the neighbouring medical centre is being utilised as a drop-off and pick-up area for elderly and disabled individuals accessing nearby services. Refer to figures 11 to 16.

To improve the streetscape and enhance safety in the locality, we recommend the council convert a portion of the existing on-street parking in front of the subject property into a designated drop-off and pick-up zone specifically serving the patients of the proposed medical tenancy, the nearby medical centre and related medical uses.

This initiative would streamline access for patients and visitors, reducing congestion and improving the overall flow of vehicles and pedestrians in the area. By clearly separating drop-off activity from general traffic and parking, the concept enhances pedestrian movement and creates a safer, more organised environment for all users of the space. The proposed new drop-off zone could accommodate up to 3 vehicles in the area marked in Figure 17.



Figure 11: Ambulance parked in front of car park driveway



Figure 12: Ambulance parked in front of car park driveway



Figure 13: Car stopped in a no stopping zone to drop off elderly person with a walking frame.



Figure 14: Car stopped in a no stopping zone to drop off elderly person with a walking frame.

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Figure 15: Passenger van parked in a no stopping zone to drop off a person in a wheelchair to the neighbouring medical centre.



Figure 16: Passenger van parked in a no stopping zone to drop off a person in a wheelchair to the neighbouring medical centre.



Figure 17: Recommended new drop-off and pick up zone marked with a red line.

Service vehicle zone

To accommodate service vehicles such as waste removal on the ground level, it is recommended that a concrete footpath is constructed to allow for ease of access to the rear of the building whilst maintaining the safety of all users. The proposed footpath is marked on the attached plan P101.

Annexure 2 – Pipeline Corridor Letter by APA Group

3rd April 2025

APA Reference: 506881

Your Reference: N/A

George Scoufis
Highfield Property Australia

EMAIL OUT: gscoufis@highfieldproperty.com.au

Dear George,

RE: Proposed works at 11-17 Marco Avenue, Revesby NSW.

Thank you for your referral request received on 24th March 2025 in relation to the proposed works at 11-17 Marco Avenue, Revesby NSW.

APA Group (APA) is a leading Australian owned and operated energy infrastructure business with a \$22 billion portfolio of assets, delivering essential energy services across all of Australia. Our focus is on providing safe, reliable, affordable, and low emissions energy to Australian communities. Our investments are also critical to supporting Australian jobs, manufacturing and industry. APA is a trusted owner and operator of a range of energy infrastructure – from renewable energy, to electricity interconnectors and transmission, through to gas generation plants and transmission pipelines.

APA is the Pipeline Licensee for the Moomba to Sydney Ethane Pipeline, (see table 1 for details):

Table 1: Transmission gas pipelines in the area of consideration

Pipeline	Pipeline Licence	Easement Width (m)	Diameter (mm)	Measurement Length m)
Moomba to Sydney Ethane	15	24.39	200	600
Note: Measurement Length is applied to either side of the pipeline.				

APA's Role

As a Licensee under the Pipelines Act 1967, APA is required to operate High Pressure Gas Transmission Pipelines (**HPGTP**) in a manner that minimises environmental impacts and protects the public and property from health and safety risks. Once a HPGTP is in place, APA is required to constantly monitor both the pipeline easement and also a broader area within which we are required to consider land use changes and development and to assess what such changes means to the risk profile of the HPGTP.

APA has a number of responsibilities and duties to perform under a complex framework of legislation, standards and controls across Federal, State and Local Government. In particular, our HPGTPs are required to be operated in accordance with Australian Standard 2885 (Pipelines – Gas and Liquid Petroleum) (AS2885). In discharging our regulatory responsibilities, APA is required to monitor what is happening around its assets including land use change and development. This allows APA to ensure it

remains in a position to comply with applicable operational and safety standards and legislation whilst meeting community expectations on energy supply.

Pipeline Risk Profile and the Measurement Length

In managing HPGTP's and considering land use changes, APA must focus on that area geographically defined by AS2885 as the Measurement Length (**ML**). The ML area is the heat radiation zone associated with a full-bore pipeline rupture. APA is mandated to consider community safety in the ML due to the high consequences of pipeline rupture to life, property and the economy.

The ML is determined by taking account of a number of factors including the design criteria of the pipe (driven by the environment within which it was designed for at the time of construction) and the Maximum Allowable Operating Pressure (MAOP) of the pipe. APA must consider any changes of land uses within the ML area to determine the effect of a new use on the risk profile of the pipeline.

For reference, the ML of the Moomba to Sydney Ethane Pipeline is 600 metres. Note that the ML is a radial dimension, and therefore applies to both sides of the pipe.

Pipeline Corridor Management

To ensure compliance with the safety requirements of AS2885, APA needs to ensure its assets are managed to an appropriate standard. This includes:

- Ensuring the pipeline is maintained free of inappropriate vegetation and structures.
- Place warning signs at various mandated points along the pipeline route, including any change in property description/boundaries.
- Maintain a constant line of sight between warning signs.
- Undertake physical patrols and inspections of the easement.

APA will not accept outcomes that do not enable us to achieve our safety responsibilities to the surrounding community.

Proposed Development

APA's advice is based on a review of the Signage Plan, Car Parking Plan, and Lease Plan prepared by Highfield Property Australia, as provided in the email dated March 24, 2025. The proposal involves modifications to the existing building, including the conversion of the ground floor into smaller retail spaces. Additionally, the proposal includes new signage on the building and the construction of a roof over the first-floor car park

Comments

On the basis of the information provided, APA does not object to the proposal subject to the following conditions being included within any approval issued for the proposal:

1. Buildings, structures, roadway, pavement, pipeline, cable, fence or any other improvement on or under the land within the gas transmission pipeline easement must not be constructed without prior

consent in writing from the pipeline licensee/operator (APT Petroleum Pipelines Pty Ltd). No structure or vegetation will be permitted on the easement that prohibits maintenance of line of sight along the pipeline easement.

2. Prior to the commencement of any works within the gas transmission pipeline easement, the proponent must enter a Third Party Works Authorisation agreement with the pipeline licensee/operator (APT Petroleum Pipelines Pty Ltd). Works within the easement must comply with any conditions attached to a third party works approval.

3. No stockpiles or storage of material is to be stored on the gas pipeline easement at any time.

4. All plans which include the area of the gas pipeline must have the pipeline easement clearly identified with hatching. The area must also be clearly labelled as '*high pressure gas pipeline right of way – no works to occur without the prior authorisation of the pipeline operator*'.

For any further enquiries relating to this correspondence, please feel free to contact myself on 07 3223 3385 or the Infrastructure Planning & Approvals team at planningnsw@apa.com.au.

Yours faithfully,



ZIJAD BAJREKTAREVIC
URBAN PLANNER
INFRASTRUCTURE PLANNING AND APPROVALS
APA GROUP