URBIS

DRAFT PLANNING PROPOSAL

263-273 and 273A Coward Street and 76-82 Kent Road, Mascot

Prepared for

PERPETUAL CORPORATE TRUST LIMITED AS THE TRUSTEE OF THE LMLP 1 AND 2 TRUST

12 May 2023

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Project Code	P0042569
Report Number	Final

Urbis acknowledges the important contribution that Aboriginal and Torres Strait Islander people make in creating a strong and vibrant Australian society.

We acknowledge, in each of our offices, the Traditional Owners on whose land we stand.

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This Draft Planning Proposal has been prepared by Urbis Pty Ltd on behalf of Perpetual Corporate Trust Limited (**PCTL**) as the trustee of the LMLP 1 and 2 Trust (**the proponent**) in support of a proposed amendment to the *Bayside Local Environmental Plan 2021* (**BLEP 2021**).

The Draft Planning Proposal has been prepared in accordance with Section 3.33 of *the Environmental Planning and Assessment Act 1979* (**EP&A Act**) and the Department of Planning and Environment (**DPE**) *Local Environmental Plan Making Guideline* (**the LEP Guideline**) dated September 2022.

The following table has been prepared to respond to the relevant requirements listed in Section 2 of the LEP Guideline.

Table 1 Key Components

Item	Description
Site Address	263-273 and 273A Coward Street and 76-82 Kent Road, Mascot
Legal Description	Lots 100 and 101 in DP 1277278, Lot 5 in DP 1194564 and Lot 3 in DP 230355
Existing Planning Controls	*Bayside Local Environmental Plan 2021* ▪ Land Use Zone: E4 General Industrial ▪ Height of Building: 44 metres ▪ Floor Space Ratio: 1.2:1 or 1.5:1 ▪ Schedule 1 Additional Permitted Uses in association with Sydney Airport *Bayside Development Control Plan 2022* (**BDCP 2022**) ▪ Carparking Rates: - Warehouse and distribution centres: one space per 300m^2 GFA, - Plus, Ancillary offices: one space per 80m^2 GFA ▪ Setbacks: - Front building setback: 9 metres - Side building setback: 2 metres - Rear building setback: nil to 3 metres ▪ Landscaped area: 10%
Proposed Amendments	The Draft Planning Proposal seeks to: ▪ Update the FSR Map to provide a maximum FSR of 2:1 under clause 4.3. ▪ Remove the site from the Additional Permitted Uses Map under clause 14 in Schedule 1. ▪ Introduce a new clause in Schedule 1 which enables additional permitted uses on the site, including:

Item	Description
	- 'Office premises' - 'Café or restaurant' - 'Recreation facility (indoor)' - 'Recreation facility (outdoor)'
Technical Studies	The Draft Planning Proposal has been informed by the following technical documents and studies: ▪ Survey Plan prepared by Land Partners ▪ Architectural Plans prepared by Lacoste + Stevenson and Paddock Landscape Architects ▪ Urban Design Context Report prepared by Lacoste + Stevenson and Paddock Landscape Architects ▪ Visual Impact Assessment prepared by Paddock Landscape Architects ▪ Landscape Concept Plan prepared by Paddock Landscape Architects ▪ Arborist Report prepared by Canopy Consulting ▪ Heritage Impact Statement prepared by Urbis ▪ Aboriginal Objects Due Diligence prepared by Urbis ▪ Transport Report prepared by Colston Budd Rogers Kafes (**CBRK**) ▪ Economic Impact Assessment prepared by Urbis ▪ Civil Engineering Report / Flood Impact Assessment by Costin Roe Consulting ▪ Acoustic Assessment (Aircraft Noise) prepared by Renzo Tonin ▪ Aeronautical Impact Assessment prepared by Landrum Brown ▪ Preliminary Site Investigation prepared by Reditus ▪ Detailed Site Investigation prepared by ERM ▪ Pipeline Hazard Analysis prepared by Riskcon ▪ Service Infrastructure Assessment prepared by Land Partners ▪ ESD Report prepared by E-Lab ▪ Connecting with Country Framework prepared by Cox Inall Ridgeway ▪ Curatorial Vision Framework prepared by Cultural Capital ▪ LEP Mapping prepared by Urbis

The Draft Planning Proposal has been subject to a rigorous assessment process which demonstrates the proposed amendments to the FSR control and Schedule 1 provisions in the BLEP 2021 are entirely appropriate and justified based on the following matters:

Strategic Merit

- The Draft Planning Proposal gives effect to the *Greater Sydney Region Plan* and the *Eastern City District Plan* and is entirely consistent with *Future Bayside: Local Strategic Planning Statement*.
- The site is adjacent to Sydney Airport and strategically located close to Port Botany, each of which are identified as major assets and trade gateways within the Eastern Economic Corridor. The proposed amendments provide a clear and concise approach to delivering additional industrial/warehouse floorspace to support the Sydney CBD, Sydney Airport and Port Botany.
- The renewal of the existing industrial zoned land will optimise the competitive advantages and efficiencies of the proximity to these gateways and deliver additional floor to support their growth, capacity and growth, as well as associated supply chain industries.
- With the growth of e-commerce, time sensitive and last mile delivery services, the site is strategically located to cater for these growth industries across eastern, south-eastern and northern suburbs of Sydney.
- The proposal will support the retention and management of industrial areas within the Eastern City District and generate additional employment opportunities within an accessible location.
- The plan amendments seek to leverage the significant government investment in nearby transport infrastructure, including the WestConnex and Sydney Gateway projects and deliver additional floor space capacity in an appropriate and accessible location.
- The proposed FSR uplift will assist with driving the revitalisation of out-dated industrial facilities and provision of modern well-designed buildings which meet current operational requirements, particularly for time sensitive and last mile distribution activities. The site is well located and accessible to attract and retain employees, driving continued innovation and employment growth in the freight and logistics sector.
- The proposed additional permitted uses under Schedule 1 will activate and enliven the streetscape and provide amenity for future workers at the site and surrounding industrial zone. The additional uses are limited in scale and will not impact on the integrity of the E4 zone or the retention and management of industrial land.
- The Draft Planning Proposal does not rely upon a change in circumstances that has not been recognised by the existing strategic planning framework.

Site Specific Merit

- Indicative concept designs prepared for both 1.2:1 and 2:1 FSR controls demonstrate the increase in FSR has little impact on the massing of the development proposed for the site. As such, the proposed FSR uplift will have negligible impact on the overall bulk and scale of future development at the site.
- The positioning of the site near Port Botany and Sydney Airport positions the potential future development as being strongly suited to the growing demand for warehouses as ‘last mile logistics operations’. The site is ideally placed to respond to this growing need in the freight and logistics sector.
- The site is well-located to optimise recent major investments and upgrades in road transport infrastructure which enhance the connectivity of the site and its associated competitive advantages, including the St Peters Interchange, M8 Motorway and the M4 and M5 Link Tunnels.
- The proposal will facilitate improvements to the quality of the built form along Coward Street and the future redevelopment of the site committed to achieving design excellence and delivering ESD strategies and initiatives through the development application (**DA**) stage.
- The site-specific additional permitted uses would provide amenity for workers in Mascot, which will greatly improve the competitive positioning of the area in being able to attract new workers and businesses.
- The Draft Planning Proposal will result in positive social benefits through increased employment opportunities within close proximity to a number of high-density residential developments and public transport services.

- The visual impacts of the FSR uplift would not be substantially different in scale and character from the surrounding existing built form.
- Previous site contamination investigations do not identify any major risks which would impact on the Draft Planning Proposal.
- The Draft Planning Proposal is acceptable from a built heritage perspective. No heritage items will be altered or impacted by the proposal and there are no Aboriginal objects or Aboriginal places registered within the subject area.
- There are no direct aviation safety related impediments in relation to the Draft Planning Proposal.
- Future development of the site can be suitably accommodated within the surrounding transport network subject to the infrastructure upgrades identified for the Coward Street and Kent Street intersection.
- Infrastructure services are readily available from existing utility service operators and will provide adequate capacity to accommodate the proposed density.
- The site is located within an existing urban area with good access to public transport and other infrastructure in particular, Mascot train station and Sydney Airport.
- There will be no impact to the high-pressure dangerous goods or gas pipelines in the vicinity of the site as a result of future development.

Accordingly, it is **recommended** the Planning Proposal is endorsed by Council to enable a gateway determination by DPE.

1. Introduction

This Draft Planning Proposal has been prepared by Urbis Pty Ltd on behalf of PCTL as the trustee of the LMLP 1 and 2 Trust to amend BLEP 2021 as it relates to land at 263-273 and 273A Coward Street and 76-82 Kent Road, Mascot.

1.1. Vision and Objectives

The Draft Planning Proposal seeks to deliver critically needed industrial floor space close to Sydney Airport, Port Botany and Sydney Central Business District (**CBD**). The Planning Proposal also seeks to deliver additional uses to provide for the health and wellbeing of future workers at the site and the immediate locality.

The key objectives of the Planning Proposal are to:

- Support the growth of the Harbour CBD and the Eastern Economic Corridor through delivering additional warehouse space which caters for the freight and logistic sector.
- Optimise the floorspace potential of the site by increasing the FSR control, while maintaining the existing maximum building height and demonstrating compatibility and consistency with the surrounding locality.
- Encourage local investment and employment growth by delivering a high-quality development with warehouse and ancillary office spaces that meet existing and likely future market demand.
- Provide for additional land uses which complement the primary industrial activities and deliver a high level of worker amenity and an attractive streetscape.

Each of these matters is addressed in detail throughout this report and the technical deliverables, demonstrating how the objectives will be realised through the Planning Proposal and future development.

1.2. Proposed Plan Amendments

A Planning Proposal Request has been prepared in accordance with Section 3.33 of the EP&A Act and the LEP Guidelines dated September 2022.

This Planning Proposal seeks to amend the BLEP 2021 by:

- Updating the FSR Map to provide a maximum FSR of 2:1 under clause 4.3.
- Removing the site from clause 14(1) and the Additional Permitted Uses Map under Schedule 1.
- Introducing a new clause in Schedule 1 and updating the Additional Permitted Use Map which enables additional permitted uses on the site.

No changes are proposed to the E4 General Industrial zone provisions or the 44 metre maximum building height control which currently apply under BLEP 2021.

1.3. Report Structure

The Planning Proposal report is structured as follows:

- **Section 2:** detailed description of the site and locality context.
- **Section 3:** project history including preliminary consultation with Bayside Council and other agencies/authorities.
- **Section 4:** summary of current statutory planning framework, including local planning controls and development contributions.
- **Section 5**: outline of the indicative development concept plan associated with the Planning Proposal.
- **Section 6:** detailed assessment of the Planning Proposal in accordance with the DPE guidelines.

2. Site Context

This section of the report describes the site and surrounding land, including the immediate locality and regional context. It identifies the key site features and the opportunities and constraints relevant to the proposed plan amendments. It also identifies the strategic policy context relevant to the site and its future development.

2.1. Site Description

The land to which this planning proposal relates to is 263-273 and 273A Coward Street and 76-82 Kent Road, Mascot as shown in **Figure 1**.

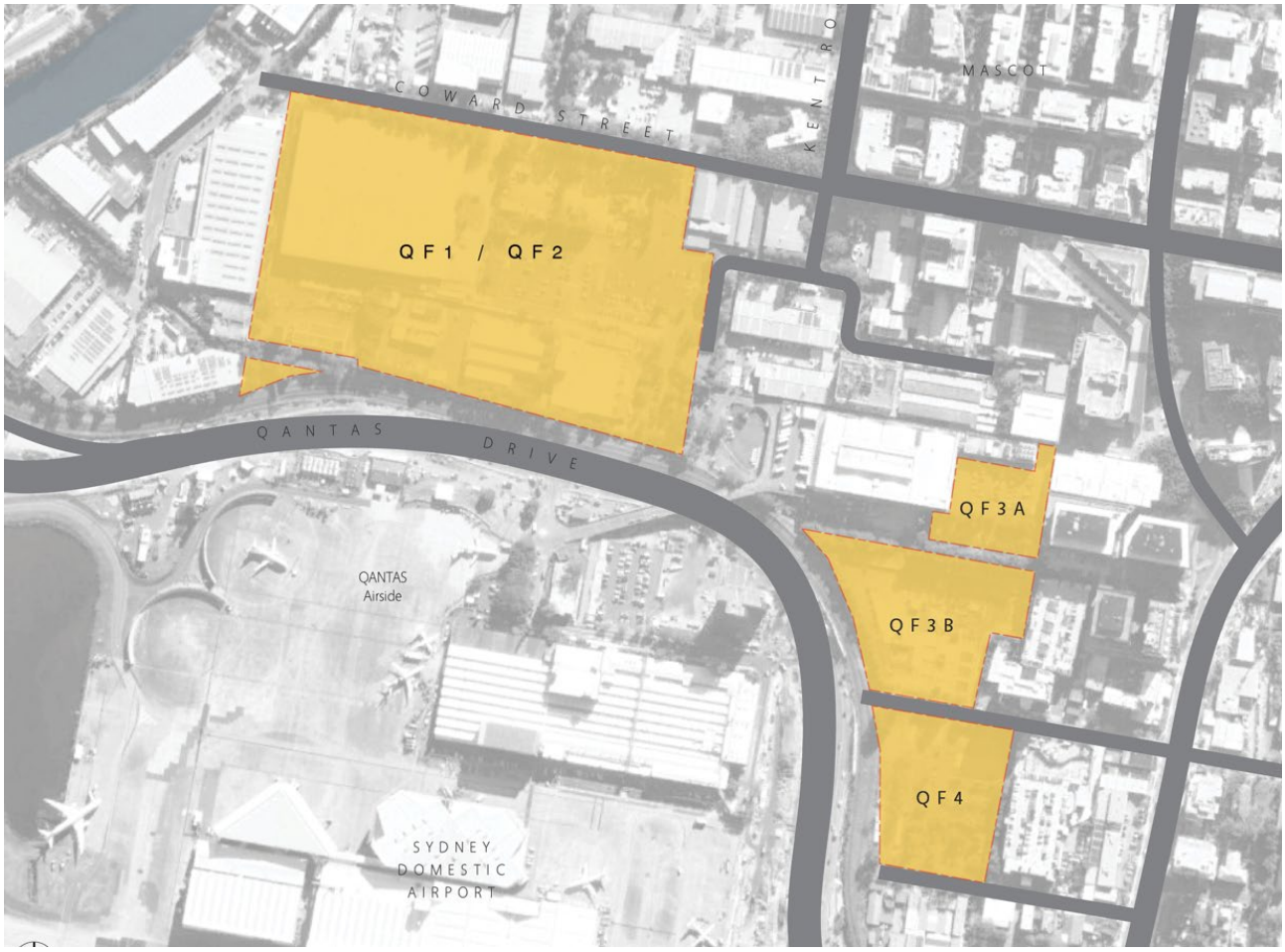
Perpetual Corporate Trust Limited purchased the site and nearby land parcels from Qantas Airways Limited (**Qantas**) in late 2021. The consolidated land holding comprises a total of 137,565m^2 as shown in **Figure 2**. This Planning Proposal applies to the northern lot identified as QF1 and QF2 comprising 94,565.6m^2, with access from both Kent Road and Coward Street. Photographs of the existing development are provided as **Figure 3**.

The key features of the site, including the legal description, natural environment and built environment are summarised in **Table 2**. The locality context is described in **Section 2.2**.

Figure 1 Aerial Photograph

Source: Urbis, 2022

Figure 2 Existing Development and Uses (QF1 and QF2)



Source: LOGOS, 2023

Figure 3 Site Photographs

Picture 1 Existing warehouse from Coward Street

Source: Urbis, 2023

Picture 2 Existing trees along northern boundary

Source: Urbis, 2023

Table 2 Site Description

Feature	Description
Legal Description	▪ Lots 100 and 101 in Deposited Plan 1277278 ▪ Lot 5 in Deposited Plan 1194564 ▪ Lot 3 in Deposited Plan 230355
Site Area	94,565.6m^2
Site Dimensions (approximate)	▪ 380 metres frontage to Coward Street ▪ 260 metres western boundary ▪ 250 metres eastern boundary (fragmented) ▪ 400 metres southern boundary
Easements and Restrictions	▪ Easements for drainage (G, G1, F and F1) through the northern part of Lots 100 and 101. ▪ Proposed easement (C1) for electricity purposes in southwestern corner of Lot 101 ▪ Lease for a substation premises (P1) in the southwestern corner of Lot 101 ▪ Easement for electricity purposes (EE) in the eastern part of Lot 100. ▪ Multiple rights of access/rights of way (R, AS, RW, AC) through the southern parts of Lots 100 and 101 and the eastern part of Lot 100 ▪ Easement for access (E) along the western boundary of Lot 101. ▪ Covenant affecting the northern part of Lot 100 facing Coward Street and relates to a historic requirement from 1953 to obtain consent from adjoining land owners for the erection of boundary fencing between Lots 2 and 6 in Registered Plan 1594. A copy of the Deposited Plan is provided as **Figure 4.**
Site Topography	The site is relatively flat, with levels varying across the 9.5 hectare site from approximately RL 2m AHD on the western and southern parts of the site to RL 4m AHD on the eastern and northern parts of the site.
Ecological Characteristics and Values	There are significant trees across the site, primarily within the landscaped setbacks along the northern and southern boundaries of the site but also within the Kent Road setback and along the edges of the hardstand car parking areas. An Arborist Report has been prepared by Canopy Consulting which details the health and condition of trees at the site and on adjoining properties that may be affected by future development - refer to **Section 6.3.3**.
Hydrology	The site is approximately 115 metres from the Alexandra Canal, which comprises a tidal waterway with direct connection to Botany Bay.

Feature	Description
	A Civil Engineering Report and Water Sensitive Urban Design (**WSUD**) Strategy has been prepared by Costin Roe Consulting, which considers the stormwater requirements associated with future development of the site. An existing council stormwater drainage pipe runs from the east to west from Kent Road before routing south towards the Sydney Water channel. The site has developed drainage systems that collect rainwater and discharge it into the stormwater channel. The stormwater channel ultimately discharges into the Alexandra Canal. Consultation with Sydney Water has been undertaken which has confirmed that that attenuation of stormwater runoff is not required for future development of the site, refer to **Section 6.3.3.**
Scenic and Culturally Important Landscapes	There are no known scenic and culturally important landscapes based on the existing development at the site. However, it is recognised that the site is highly visible from Qantas Drive and Sydney Airport. A Visual Impact Assessment (**VIA**) has been prepared by Paddock Landscape Architects which concludes the proposed FSR uplift will not result in a greater view impact than what is currently enabled under the planning controls in the BLEP 2021 - refer to **Section 6.3.3**.
Heritage (Aboriginal and Non-Aboriginal)	The site does not contain any listed heritage items under BLEP 2021 or the State Heritage Register. The closest listed heritage items are at Sydney Airport to the south and the Alexandra Canal to the west, which has both State and local heritage significance. The Heritage Impact Statement (**HIS**) prepared by Urbis confirms the Planning Proposal is acceptable from a heritage perspective. The Aboriginal Objects Due Diligence Report prepared by Urbis confirms no Aboriginal objects or Aboriginal places are registered within the subject area - refer to **Section 6.3.3**.
Existing Development	The western part of the site accommodates a large-scale warehouse building with vehicle access via Coward Street and site landscaping along the northern setback and the western side boundary. The building is occupied by the Qantas Sydney Distribution Centre (**SDC**) with a 10-year leaseback to Qantas Airways Limited (**Qantas**). The continuation of the ongoing site activities in the short-medium term will inform staging of the future development. The eastern part of the site comprises large hardstand areas and existing buildings and structures, primarily along the southern boundary. The hardstand areas provide parking for heavy vehicles (generally to the north adjoining Coward Street) and car parking for Qantas staff. The leaseback over the QF2 site is limited to 2-3 years, providing the opportunity for its redevelopment in the short-term.
Services and Utilities	A Service Infrastructure Assessment has been prepared by Land Partners which confirms the site is located within a well serviced industrial precinct. Substantial infrastructure has been installed by the utility service operators that will provide adequate capacity to accommodate the proposed density uplift. The Service Infrastructure Assessment confirms:

Feature	Description
	▪ Future development of the site may be adequately serviced by the existing Sydney Water reticulation facilities. ▪ Adequate wastewater capacity exists to service future development of the site. ▪ Substantial high voltage reticulation systems exist in Kent Road and Coward Street to cater for the estimated electrical demand generated by future development. ▪ The site is adequately serviced by the existing fibre optic systems in Coward Street and Kent Road.

Figure 4 Deposited Plan

Source: Land Partners, 2023

2.2. Locality Context

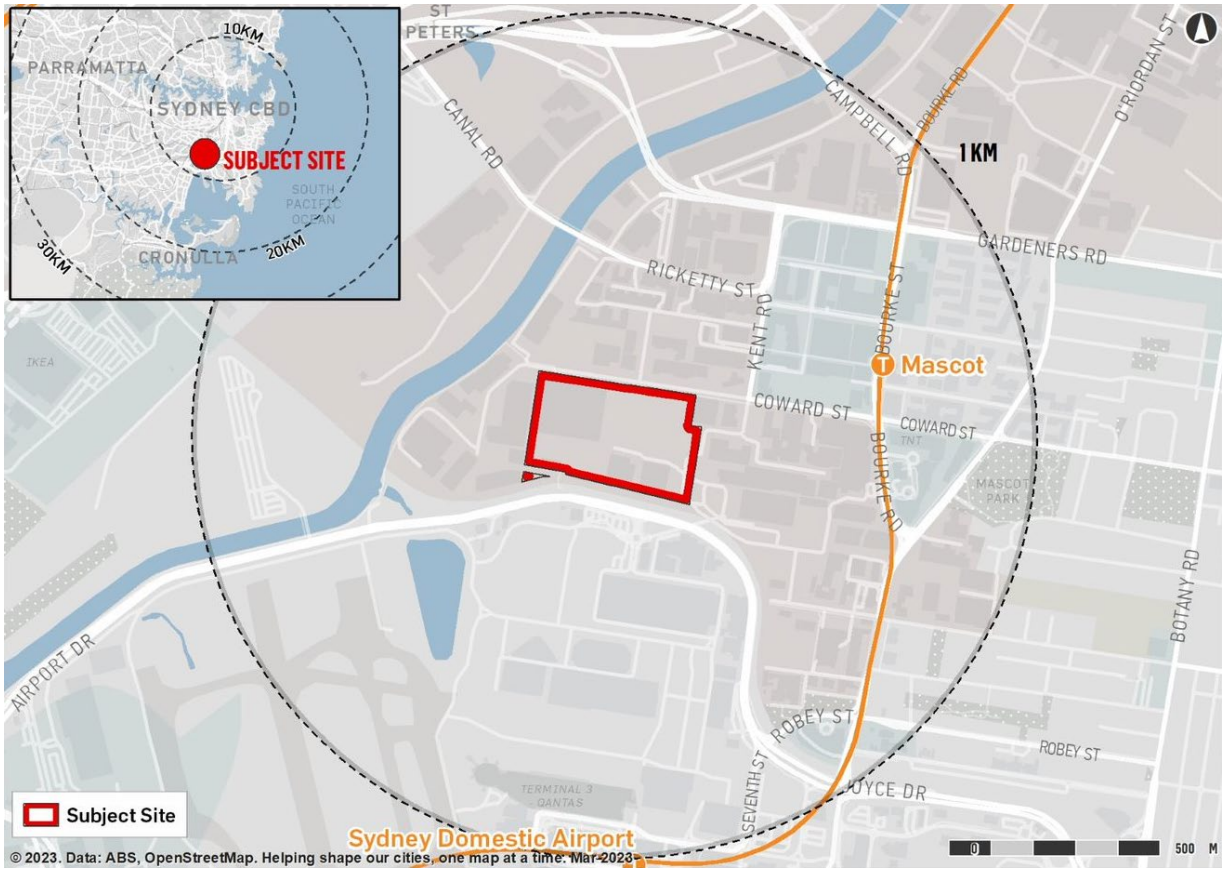
A location plan is provided as **Figure 5** which identifies the site within its regional context, including its proximity to the Sydney CBD, Sydney Airport and Mascot Station. The aerial photograph provided as **Figure 6** shows the site within the Mascot West Employment Lands Precinct and its proximity to major transport infrastructure, including WestConnex and the Sydney Gateway Road Project.

Land uses within the Mascot West Employment Lands include warehouse and distribution developments (related to freight transportation) and manufacturing facilities. The Mascot-Green Square precinct has been undergoing significant change, transforming to a mixed-use precinct, including high-density residential development to the east, particularly around Mascot Station. The land further the east of the site and south of the station includes short stay accommodation, vehicle hire premises and other land use activities which support Sydney Airport and the tourism sector.

Photographs of development on the surrounding land are provided as **Figure 7**. Land use activities within the adjoining and surrounding industrial zoned land include:

- Airgate Business Park is located to the west of the site, extending towards the Alexandra Canal. The estate is owned by Goodman and comprises multiple buildings which are subject to separate lease agreements. The immediately adjoining building along the western and currently accommodates the DHL Express Head Office and associated freight and logistics operations. Other tenants include Woolworths and Toll Global Forwarding.
- The industrial zoned land to the north on the opposite side of Coward Street accommodates a variety of small-medium scale industrial style buildings, including catering services, medical services and more traditional manufacturing and warehousing activities. There are also several large hardstand areas which appear to be utilised by vehicle hire premises and parking for freight logistics and construction vehicles.
- The immediately adjoining land to the east along Coward Street includes older-style industrial buildings which accommodate manufacturing activities and an industrial and commercial office building on the corner of Coward Street and Kent Road which includes an industrial retail outlet. The industrial development to the east of Kent Road includes larger scale warehouse buildings with multiple tenancies, including Dnata Australia which provides ground handling, cargo services and food and beverage services at Sydney Airport, as well as in-flight catering services.
- The site adjoins the Port Botany freight line along its southern boundary. Preliminary discussions with ARTC have confirmed that it would not be possible to provide rail access to the site based on its limited frontage. Preliminary investigations also confirmed there is a main gas pipeline along Qantas Drive.

Figure 5 Location Plan

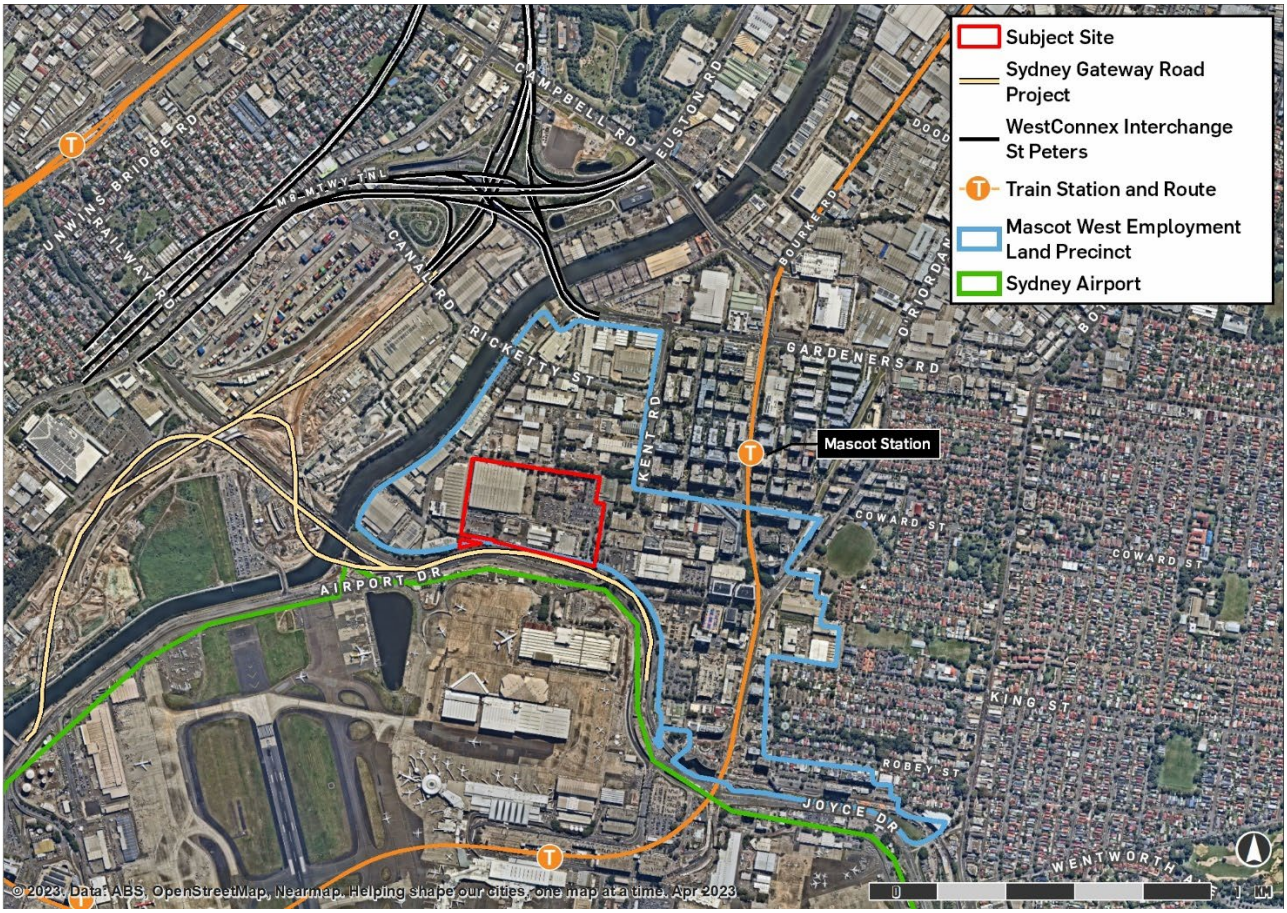


Source: Urbis, 2022

The site does not benefit from close access to community or social services. The transformation of the Mascot-Green Square precinct has provided land use activities to support the growing residential population. However, there is a lack of amenities and facilities within the immediate context of the site.

The site is well-serviced by road transport, with multiple frontages to Coward Street and Kent Road. Access to Qantas Drive is available via Bourke Road and O'Riordan Street. The site also benefits from its proximity to WestConnex to the north-west via Gardeners Road and the St Peters Interchange, including the future M4 and M5 Tunnels. The site is also within 600 metres walking distance of Mascot Station and 300 metres of local bus services, providing access to public transport.

Figure 6 Regional Context Map



Source: Urbis, 2023

Figure 7 Surrounding Development Photographs

Picture 3 Industrial development north of the site

Source: Urbis, 2023

Picture 4 Industrial development north of the site

Source: Urbis, 2023

Picture 5 DHL Express Head Office immediately west of the site

Source: Urbis, 2023

Picture 6 View of Coward Street

Source: Urbis, 2023

2.3. Strategic Context

The site is located within the Eastern Harbour City within the Eastern City District and the Bayside local government area (LGA). It is located within the Eastern Economic Corridor which extends from Macquarie Park to the international trade gateways of Sydney Airport and Port Botany. The site also benefits from its proximity to the Sydney CBD which is the largest commercial office market in Australia and will continue to grow to maintain its competitive advantage.

The site is also well-located to benefit from significant investment in nearby transport infrastructure, including the WestConnex and Sydney Gateway projects. These new and upgraded transport connections will provide for reduced travel times across the Sydney road network, enabling a more efficient freight and logistics sector and enhancing the attractiveness of the Southern Employment Area to drive increased investment and employment growth.

The Draft Planning Proposal gives detailed consideration to the relevant strategic planning policies relevant to the site and its future development, including:

- *Greater Sydney Region Plan: A Metropolis of Three Cities – Connecting People* (**the Region Plan**).
- *Our Greater Sydney 2056: Eastern City District Plan – Connecting Communities* (**the District Plan**).

- *Future Bayside: Local Strategic Planning Statement – A Land-Use Vision to 2036* (**LSPS**).
- *Bayside 2032: Community Strategic Plan*

Each of these policies is addressed in detail in the Planning Proposal Assessment in **Section 6** of this report, demonstrating the strategic merit of the proposal in accordance with the LEP Guideline.

3. Project History

This section of the report summarises the recent project history relevant to the Planning Proposal, including the purchase of the land from Qantas in 2021 and the ongoing stakeholder consultations that have occurred with Bayside Council and other authorities/agencies since that time.

3.1. Purchase of Consolidated Land Holding

PCTL purchased the consolidated land holding from Qantas in late 2021. Some of the key issues which informed the decision to make a significant economic investment in the consolidated land holding at Mascot included:

- Since 2004, approximately 70 hectares of industrial land in the precinct has been rezoned to other uses (primarily residential).
- The industrial vacancy rate was 0.4% in South Sydney. In the Mascot/St Peters and Botany/ Banksmeadow/Matraville markets, the scarcity of accommodation with over 5,000m^2 net lettable area was evidenced by vacancy rates of 0.0% and 1.5% respectively.
- Few industrial buildings have been constructed in the last 25 years, despite significant changes in tenant and operational requirements within the local market, including reduction in manufacturing activities and increased warehouse or distribution centre operations. Many tenants have chosen to remain in outdated facilities due to the lack of alternative locations in the locality.
- On-line spending in Australia is projected to grow to $79 billion by 2025. Every additional $1 billion in on-line spending equates to approximately 60,000m^2 additional industrial demand, equating to 1.8 million m^2 between 2021 and 2025.
- Analysis indicated this could require an additional 250,000m^2 of warehouse or distribution space within this locality by 2028. This demand will be exacerbated by existing tenants which need to modernise and automate their supply chain and distribution strategies. Older style industrial buildings will become redundant, with tenants requiring different building typologies and configurations to meet their operational needs.
- Mascot is ideally located to cater for time sensitive and last mile distribution across the Eastern, South-Eastern and Northern Suburbs of Sydney. These areas can be challenging to service from most industrial precincts within Western Sydney, especially with increased customer demand and expectations for shorter delivery timeframes (i.e. within 3 hours or next day delivery).
- The site is very well connected to the Sydney Airport and Port Botany, being the primary locations for the importation of goods in Sydney, with an increasing need for local air freight distribution facilities. Recent investments in transport infrastructure, such as the Sydney Gateway project, have further improved connectivity to the area and improved travel times for freight and logistics.
- Mascot is also ideally located to attract and retain suitably qualified and creative talents from the Eastern and Northern Suburbs. This will be increasingly important with continued innovations and technology use in the freight and logistics sector, including automation.

Overall, the analysis undertaken at the time of purchase confirmed the locality had relatively low supply of industrial land, with strong competition to find and secure tenancies from users requiring proximity to Port Botany, Sydney Airport and the Sydney CBD. The key opportunities associated with the site and its future development potential were summarised as follows:

- **Landmark and High-Quality Development Outcomes**: opportunity to deliver a large scale, state-of-the-art warehouse or distribution development which meets the existing and forecast needs of the e-commerce sector and a projected end value of approximately $2 billion.
- **Innovative Supply Chain and Distribution Solutions**: South Sydney is Australia's most sought-after logistics market, characterised by depleting land supply and strong demand for last-mile accommodation. The site presents a significant opportunity to meet the existing and likely future demand for well-located modern industrial buildings, supported by a significant business and population catchment.
- **Value Enhancement Opportunities**: several leasebacks remain in place for Qantas to continue their current site operations in the short to medium terms. This provides for ongoing revenue while the proponent pursues the required planning approvals to optimise the future development of the site,

including ongoing consultation with both Qantas and Sydney Airport Corporation Limited (**SACL**) regarding their strategic goals.

Detailed consideration was given to the existing local planning controls in preparing preliminary concept plans to inform the site potential. It was quickly realised the floor space of buildings which comply with the maximum 44 metre height control would be constrained by the FSR control of 1.2:1. Further, the provisions were overly complicated and land use activities which are permitted in the IN1 zone may not be able to optimise their proximity to both international trade gateways (i.e. Sydney Airport and Port Botany).

Further investigations were also undertaken to understand the rationale which underpinned the development of the Schedule 1 provisions in the LEP. A review of the Draft Planning Proposal[1] prepared by the (then) City of Botany Bay to facilitate the plan amendment confirmed the following:

- The existing Schedule 1 provisions were initiated by Qantas in mid-2012 and in response to the public exhibition of draft *Botany Bay Local Environmental Plan 2012*. Qantas sought additional FSR and land uses to facilitate the development of their land for airport-related land uses.
- An application was made by Qantas on 9 December 2013 seeking a new land use objective, additional permitted uses and additional FSR provision to be inserted in the LEP. The intended outcomes of the Planning Proposal were listed by Council in Planning Proposal No 1/2014 dated 8 April 2014 as follows:
    - *Explicitly acknowledge the strategic importance of the Qantas Land in supporting the role of Sydney Airport and environs;*
    - *Allow greater flexibility in the use of the Qantas Land reflecting its strategic importance adjacent to Sydney Airport;*
    - *Enable a range of airport-related uses on the Qantas Land that will support Sydney Airport; and*
    - *Increase the amount of floor space permitted on the Qantas Land zoned IN 1 – General Industrial for "airport related land uses" or "airport related industries".*
- Qantas sought to retain historic land use provisions from the former *Botany Bay Local Environmental Plan 1995* in the translation of the existing local provisions into the new Standard LEP format. Qantas also sought to accommodate the existing and anticipated future development identified in their land uses analysis, maintaining the permitted floor space under the 'gross floor area' definition in the former LEP.

The previous Planning Proposal indicates the Schedule 1 provisions were strongly linked with Qantas and their direct association with Sydney Airport. However, Qantas has since sold the land and may relocate their existing activities. Accordingly, it was considered appropriate to review the site-specific provisions and consider an alternative planning mechanism which delivers floor space to support both international trade gateways, including Sydney Airport and Port Botany.

Based on the above, the proponent initiated a Planning Proposal process with Bayside Council as outlined in further detail in **Section 3.2**.

[1] https://www.planningportal.nsw.gov.au/ppr/lep-decision/additional-objectives-in1-and-b5-zones-airport-related-land-uses-and-industries, downloaded 15 September 2022

3.2. Stakeholder Consultation

The proponent undertook preliminary consultation with key stakeholders prior to preparing and lodging a Scoping Proposal with Bayside Council. This early consultation sought feedback regarding the proposal, including the key assessment issues and likely documentation requirements. The relevant stakeholders, issues discussed and preliminary responses are summarised in the following table.

Table 3 Summary of Preliminary Stakeholder Engagement

Key Issues	**Proponent Responses**
Bayside Council	
The proponent met with Council on several occasions since agreeing to purchase the former Qantas land, including preliminary discussions on 17 November 2021, a more detailed technical briefing on 31 May 2022 and a follow up meeting on 17 August 2022 to understand the requirements for preparing a Planning Proposal for QF1 and QF2. Relevant issues discussed in these meetings included: ▪ **Strategic Justification**: an objective and evidence based approach will be adopted for any LEP changes and their potential merits, including consideration of Council's Local Strategic Planning Statement (**LSPS**) and Employment Lands Study (when publicly released). ▪ **Transport and Traffic**: detailed traffic modelling will be required to confirm the capacity of the local road network, including consultation with Transport for NSW to confirm which intersections will need to be assessed. Consideration will also need to be given to modal splits, a Green Travel Plan, heavy vehicle movements (particularly regarding port congestion) and active transport initiatives. ▪ **Economic Impacts**: it was recognised there is an undersupply of employment land which is driving the proposal to increase the amount of floor space via a multi-level building typology. An Economic Impact Assessment (**EIA**) will be required which provides a detailed assessment of employment generation (including type of jobs) and economic generation, including contribution to GDP and economic multipliers. ▪ **Hazards and Risks**: consideration will need to be given to proximity to dangerous goods transit routes, gas pipeline, zone of influence for the airport rail line and storage of aviation	Each of the matters raised by Council has been addressed in the Planning Proposal and as summarised below. ▪ **Strategic Justification**: the strategic merit of the proposal is addressed in **Section 6.3**, including an assessment of the preliminary concept in accordance with Council's LSPS. ▪ **Transport and Traffic**: a meeting was held with TfNSW on 5 August 2022 to confirm the required scope for the traffic modelling and confirmation of forecast traffic volumes. A detailed assessment of the traffic impacts has been undertaken which confirms the proposed FSR of 2:1 and the additional permitted land uses can be accommodated on the site – refer to **Section 6.3.3.** ▪ **Economic Impacts**: an EIA has been prepared which responds to each of the matters identified by Council and confirms the benefits of the proposed additional floorspace and permitted land use activities - refer to **Section 6.3.3.** ▪ **Hazards and Risks**: detailed investigations have been undertaken to assess the potential risks associated with pipelines located in the vicinity of the site. A Pipeline Hazard Analysis has been prepared which concludes there will be no impact to the high-pressure dangerous goods or gas pipelines in the Mascot area from future development of the site. Flooding risks are addressed as part of the Civil Engineering Report and WSUD Strategy prepared by Costin Roe Consulting - refer **Section 6.3.3.** SACL and the Australian Rail Track Corporation (**ARTC**) have been approached regarding the storage of aviation fuel and dangerous goods transit routes, however this consultation is ongoing.

Key Issues	Proponent Responses
fuel, having regard to proposed increase in employment density. Flooding risks will also need to be addressed. ▪ **Built Form, Landscaping and Visual Impacts**: increased landscaping and high quality materials and finishes will be required to mitigate potential visual impacts associated with multi-level warehouse buildings and ameliorate the microclimate. Consideration will need to be given to maximum heights associated with Sydney Airport, as well as Council's LEP. Particular attention should be given to visual impacts from Qantas Drive and the ground plane, including crime prevention through environmental design. ▪ **Sustainability**: increased tree canopy cover will be sought, noting impacts of airport and port on the total tree canopy coverage within the Bayside LGA. ▪ **Contributions**: Council will seek to enter into a Planning Agreement to share any uplift in value and deliver a community return. ▪ **Documentation Requirements**: Council confirmed a Scoping Proposal will need to be prepared by LOGOS Property Group (**LOGOS**) in accordance with the DPE LEP Making Guidelines, including the relevant report template. Preliminary environmental considerations should include: - Background to site, including existing site easements/restrictions/constraints and former approval for the Qantas SIM. - Strategic context having regard to international trade gateways, including interface with Sydney Airport and relationship with Port Botany. - Urban design considerations including role as gateway to Sydney and need for high-level of design quality (branding of the city), assessment of visual impacts and activation along Coward Street. - Traffic and transport including consultation with TfNSW and future modelling.	▪ **Built Form, Landscaping and Visual Impacts**: an Urban Design / Context Report and Landscape Concept Plan have been prepared which demonstrate the way in which the future development can be designed to accommodate the 2:1 FSR, including extensive landscaping and a high-quality design outcome. The Landscape Concept Plan seeks the retention of significant existing trees around the perimeter of the site and provides for a landscaped area of 10,522.7m^2 (11.12% of total site area) exceeding the required BDCP 2022 landscape area. The indicative concept design demonstrates the proposed FSR can be delivered under the relevant maximum building height controls. The indicative concept design has been reviewed to confirm it will comply with the aviation safety controls. A VIA has also been prepared which considers the visual impacts from Qantas Drive - refer to Section 6.3.3. ▪ **Sustainability**: the concept design demonstrates the additional floorspace can be delivered in accordance with the revised FSR, while allowing for compliance with the landscaped setbacks as per the DCP to deliver increased tree canopy coverage – refer **Section 6.3.3**. ▪ **Contributions**: the Draft Planning Proposal recognises the existing local contributions which will apply in the future DA stage. It also provides for potential public benefits, including public art, stormwater and transport upgrades which would have broader benefits beyond the site. It is expected these matters will be subject to further detailed discussions with Council regarding their potential value and implementation. ▪ **Documentation Requirements**: the original Scoping Proposal and this Planning Proposal Request has been prepared in accordance with the DPE guidelines, also addressing each of the matters identified by Council.

Key Issues	Proponent Responses
- Economic impacts, including economic growth as well as economic opportunities) and Traffic, Urban Design Analysis, level of automation versus vehicle movements etc, appropriateness for change. - Site specific merit and technical analysis to consider existing LEP and potential impacts associated with proposed uplift, eg traffic generation, aesthetics, overshadowing etc.	
*Transport for NSW (**TfNSW**)*	
A preliminary meeting was held with the Gateway Project team on 24 March 2022 to provide an initial briefing regarding the land holding and the potential future development of the site. A follow up meeting was held with the Network Safety team on 5 August 2022 (following the preliminary meeting with Bayside Council) to discuss the potential for a Planning Proposal to be considered having regard to potential transport and traffic impacts. No 'in principle' objections were raised by TfNSW subject to further detailed investigations being undertaken by LOGOS, including modelling of identified intersections and confirmation of forecast traffic volumes. Further details regarding the scope for the required modelling is yet to be provided by TfNSW.	Preliminary investigations confirmed the total predicted volume is expected to be comparable with the approved Qantas Flight Training Facility (**FTC**) at 297 King Street (SSD-10154). There will be an increased number of heavy vehicles compared to the FTC, however, vehicle movements will be more spread across the day, rather than during the peak hour periods. The Transport Report was prepared by Colston Budd Rogers & Kafes in accordance with the modelling requirements established in consultation with TfNSW. It includes a SIDRA analysis of identified intersections and confirmation of forecasted traffic volumes based on TfNSW '*Guide to Traffic Generating Developments'*. The SIDRA analysis found that the adjacent road network would operate at satisfactory or better levels of service in the weekday morning and afternoon peak periods subject to identified mitigation - refer to **Section 6.3.3** for further detail.
Australian Rail Track Corporation (**ARTC**)	
LOGOS met with ARTC representatives on 15 March 2022 to provide a high-level briefing regarding the land holding and the potential future development of the site. These discussions confirmed a rail siding would not be supported for the site due to the need for over 500 metres of frontage to the rail line, which cannot be met by the current land holding.	Noted - the future development will be serviced by road transport.

Key Issues	Proponent Responses
Sydney Airport Corporation Limited (**SACL**)	
LOGOS met with representatives from SACL on 17 March 2022 to provide a high-level briefing regarding the land holding and the potential future development of the site. A follow up meeting was held on 25 August 2022 to provide an update regarding the project and understand the likely future strategic goals for SACL. It was agreed LOGOS and SACL will continue to work together to discuss opportunities for the future development to support the existing and planned future operations at Sydney Airport.	The proponent will continue to consult with SACL to discuss future development of the site and its relationship to Sydney Airport. The Aeronautical Impact Assessment prepared by Landrum & Brown confirms the consultation requirements for the future DA, including the triggers for referrals to both Sydney Airport and Air Services Australia.
Other Relevant Stakeholders	
LOGOS provided high-level briefings regarding their purchase of the former Qantas lands to State and Federal Members and other relevant government stakeholders as listed below: ▪ State Member for Maroubra, Michael Daley on 27 October 2021. ▪ State Member for Heffron, Ron Hoenig on 4 November 2021. ▪ Federal Member for Kingsford Smith, Matt Thistlethwaite on 12 November 2021. ▪ Office of the NSW Minister for Planning Rob Stokes on 22 November 2021 The stakeholder briefings were generally positive and supportive regarding the significant investment to be made by LOGOS in the locality and the potential additional employment opportunities.	N/A – no further consultation was warranted or requested by the State and Federal Members prior to the lodgement of the Draft Planning Proposal and noting the proposed plan amendments are consistent with the earlier discussions.

3.3. Scoping Proposal Requirements

Urbis submitted a Scoping Proposal to Bayside Council on 26 September 2022 which sought an update to BLEP 2021 to facilitate an increase in the current FSR development standard from 1.2:1 (or 1.5:1 under Schedule 1) to 2:1.

The proponent met with Council on 17 November 2022 to obtain preliminary feedback regarding the Scoping Proposal. Council provided a verbal update regarding the stakeholder consultation with State government authorities/agencies and infrastructure providers, including Jemena, the Department of Planning and Environment (**DPE**) Hazards Branch, NSW Environment Protection Authority (**EPA**), Heritage NSW, Sydney Water, Sydney Airport and TfNSW.

Council issued their Scoping Proposal Advice on 30 November 2022. The letter and accompanying documents detail the matters that need to be addressed in the preparation of the draft Planning Proposal, based on referral responses obtained from public agencies and technical experts within Council.

The key matters to be addressed as identified in the Scoping Proposal Advice and accompanying referral responses are listed in **Table 4**. The table also identifies how each of these matters has been addressed by the proponent within the Draft Planning Proposal.

Table 4 Pre-Lodgement Discussions

Key Issues	**Proponent Responses**
Bayside Council – Scoping Proposal Advice	
Strategic Merit The draft Planning Proposal should provide some justification around consistency with actions from the Bayside Local Strategic Planning Statement and any future strategies that may affect the land. The proposal must have regard to the following planning documents: ▪ Region Plan – A Metropolis of Three Cities: The Greater Sydney Region Plan ▪ District Plans – Eastern City District Plan ▪ Bayside Local Strategic Planning Statement (**LSPS**) ▪ Bayside Community Strategic Plan 2032 ▪ Relevant SEPPs ▪ Relevant Ministerial Directions ▪ BLEP 2021 ▪ Botany Bay DCP 2013	The Planning Proposal will give effect to the objectives and actions of the applicable relevant objectives, priorities and actions in the Greater Sydney Region Plan and the Eastern City District Plan as outlined in **Section 6.2.2.** The Draft Planning Proposal is considered entirely consistent with the local planning priorities as outlined in the Bayside LSPS, refer **Section 6.2.2.** The Bayside Community Strategic Plan 2032, relevant SEPPs and Relevant Ministerial Directions are addressed in **Section 6.3.2.** The BLEP 2021 and BDCP 2022 (which has replaced the Botany Bay DCP 2013) are addressed in **Section 5.**
Site-Specific Merit The draft Planning Proposal must be able to identify the potential environmental, social and economic impacts of the proposal, and outline proposed mitigation measures and justification. The draft Planning Proposal is to be able to demonstrate that the proposal is suitable for the site, and the site is suitable for the resultant development. The following technical information is required: ▪ Planning Proposal report (prepared in accordance with DPE's LEP Plan Making Guideline – September 2022) ▪ Urban Design/Context Report ▪ Transport Impact Assessment	The required technical documents identified in the Scoping Proposal Advice are submitted with the Draft Planning Proposal and discussed in detail in **Section 6.3.3** of this report. This includes a comprehensive assessment of the impacts of the proposal on the natural and built environments, the compatibility of the future development with the locality and the services and infrastructure required to accommodate the additional industrial floorspace and complementary land use activities. There are no likely environmental effects associated with the future development of the land that cannot be suitably mitigated through further design development at the DA stage.

Key Issues	Proponent Responses
▪ Visual Impact Assessment ▪ Statement of Heritage ▪ Landscape Concept Masterplan ▪ Economic Impact Assessment ▪ Flood Impact Assessment ▪ Preliminary Site Investigation ▪ Detailed Site Investigation ▪ Preliminary Hazard Assessment ▪ Acoustic Assessment (Aircraft Noise)	
<u>Nomination of Category</u> Under the LEP Guidelines (September 2022) it is classified as a Complex Planning Proposal.	Urbis issued emailed correspondence to Council on 2 December 2022 following a review of the Scoping Proposal Advice and querying the classification of the Planning Proposal. An extract of this correspondence is provided below: *…we understood the Planning Proposal would be a 'Standard' matter in accordance with the criteria in the LEP Making Guideline. The Planning Proposal is aligned with the strategic planning policy framework and will not result in a 'significant increase in demand for supporting local, regional or State infrastructure and would require infrastructure funding', assuming any upgrade works would be funded by the proponent.* Council advised the following in reply emailed correspondence dated 9 December 2022: *The PP does not appear to fall under amendment types for the 'Standard' category as it does not meet any of the criteria relating to a 'standard' PP, including the criteria where an amendment is consistent with an endorsed District/Regional Strategic Plan and/or LSPS. Although we have noted in our advice to you that the PP does not appear to undermine strategic merit in the locality, we were not able to confirm the PP is consistent with a District/Regional Plan or Council's endorsed LSPS. Confirmation of consistency with Strategic Merit will be made when a comprehensive assessment of the PP is made (following lodgement).*

Key Issues	Proponent Responses
	The final categorisation of this PP will be determined by DPE when they review the PP (if it proceeds to Gateway Determination). This Draft Planning Proposal addresses each of the matters identified by Council and it is our strong view the Planning Proposal should be categorised as a 'Standard' matter in accordance with the criteria in the LEP Making Guideline. The Draft Planning Proposal is aligned with the strategic planning policy framework and will not result in a '*significant increase in demand for supporting local, regional or State infrastructure and would require infrastructure funding'*, assuming any upgrade works would be funded by the proponent. Each of these matters is addressed in detail within the assessment of the Draft Planning Proposal in **Section 6**.
<u>Authority/Agency Consultation</u> The Scoping Proposal was referred to the following agencies: ▪ TfNSW ▪ NSW EPA (noise, water quality, waste management, land contamination) ▪ NSW Heritage ▪ DPE (Hazards Branch) ▪ ARTC ▪ Jemena ▪ Sydney Water ▪ Ausgrid ▪ SACL (Sydney Airport) Council has received responses from; TfNSW, EPA, DPE (Hazards & Risk), Jemena, Sydney Water and SACL. In addition, referral responses have been provided by Council's Urban Design, and Traffic, Stormwater and Flooding engineers. A summary of the feedback is included in Appendix 1.	The Draft Planning Proposal has addressed all feedback received in response to the Scoping Proposal and as outlined in further detail below.

Key Issues	Proponent Responses
Planning Proposal Process The following summary outlines the steps (generally) involved in making an amendment to the Bayside LEP 2021: 1. Draft Planning Proposal lodged 2. Detailed assessment of draft Planning Proposal 3. Draft Planning Proposal considered by: - Bayside Local Planning Panel - City Planning and Environment Committee 4. Council resolves to prepare a Planning Proposal (initial endorsement by Council) 5. Planning Proposal referred to the Department of Planning and Environment requesting Gateway Determination to proceed to exhibition. 6. Planning Proposal and any additional studies/information prepared and exhibited. 7. Public exhibition 8. Planning Proposal considered by City Planning and Environment Committee 9. Final endorsement by Council 10. Amendment to the BLEP 2021 is formally made upon notification.	Noted
Appendix 1 – Referral Response	
TfNSW ▪ A traffic assessment methodology report should be submitted outlining the study area and intersections to be assessed as well as data collection methodology. The report should also include modelling methodology and/or any other traffic assessment requirements. ▪ A SIDRA network model should be developed for the study (as per the TfNSW Modelling Guidelines). ▪ The model should be developed for the base year and opening/future (with and without development scenarios) year as a minimum. TfNSW will provide STFM traffic volume plots	The matters raised by TfNSW are assessed in detail in the Transport Report and **Section 6.3.3** of the Draft Planning Proposal. The Transport Report was prepared in consultation with TfNSW and provides a comprehensive analysis of the anticipated traffic effects associated with future development of the site and the consolidated land holding in accordance with the relevant modelling requirements.

Key Issues	Proponent Responses
for different horizon years upon review and approval of the methodology report. ▪ It is strongly recommended to submit the Base Model Development Report along with the model files for our review and approval prior to develop any future year model. ▪ Depending the completion of the projects, the future year model should include all sites for cumulative impact assessment (please see the email for more clarification). ▪ TfNSW will provide any other information (e.g. future road upgrade/improvements), if required, and as outlined in the methodology report. ▪ The final traffic assessment report should also include brief assessment of active and public transport facilities (for employees to access the site).	
<u>NSW EPA</u> The EPA does not raise any objections for the proposal. The following comments were provided: ▪ the proposal is unlikely to lead to activities that will constitute a Scheduled Activity under Schedule 1 of the Protection of the Environment Operations Act (1997) and so, will not require an Environment Protection Licence under this Act, ▪ the proposal is unlikely to lead to activities that will be undertaken by or on behalf of a NSW Public Authority, nor are there likely to be other activities for which the EPA is the appropriate regulatory authority. ▪ the site is not being regulated by the EPA under the Contaminated Land Management Act (1997) (**CLM Act**). The EPA understands that State Environmental Planning Policy (Resilience and Hazards) 2021 requires assessment of potential land contamination resulting from past land-use to determine whether the land is suitable for its proposed use or will require remediation. Under section 60 of the CLM Act, the EPA must be notified of any contamination that meets certain	Each of the matters identified by the EPA is responded to as follows: ▪ The Draft Planning Proposal does not include any construction or site operations and accordingly, there is no requirement for an Environment Protection Licence to be obtained. ▪ As per above, the Draft Planning Proposal does not seek approval for any site activities. Any relevant matters will be addressed at the DA stage. ▪ Noted The Draft Planning Proposal does not seek to alter the existing land use zoning. However, it does seek to introduce additional land use activities under Schedule 1. The relevant provisions under *State Environmental Planning Policy (Resilience and Hazards) 2021* are addressed in **Section 6.3.2**. The Detailed Site Investigation confirms the site conditions will not preclude the future redevelopment of the site in accordance with the concept designs and relevant environmental standards. Further detailed investigations and works will be undertaken at the DA stage – refer **Section 6.3.3**.

Key Issues	Proponent Responses
triggers. These are outlined in the Guidelines on the duty to report	
DPE (Hazards Branch) ▪ The proposal is located at about 500m away from an existing high-pressure pipeline operated by Ampol, which is licensed under the NSW Pipeline Act 1967. In addition, it is located at about 100m away from an existing Primary Gas Pipeline which is operated by Jemena under the Gas Supply Act. ▪ In accordance with the principle set out in Clause 2.76 of Transport and Infrastructure SEPP 2021, pipelines licensed under the Gas Supply Act are not subject to risk consideration. Given the site is far away from the Ampol pipeline and the extent of consequences from the pipeline is unlikely affecting the proposed site, a site-specific risk analysis is not required for this proposal. The potential population uplift is also unlikely affecting the societal risk profile of the Ampol pipeline. Notwithstanding, consultation with Ampol and Jemena is recommended to ensure the pipeline operators do not have further requirement associated with this proposal. ▪ As for the dangerous goods transport along Port Botany Rail Freight, it is highlighted that DPE does not have a risk criterion for dangerous goods transport movement. Unless the number of dangerous goods transport movement is significant or that could be passing the site frequently, a quantitative risk study is not necessary. It is recommended to seek information on the frequency, the types of dangerous goods and the quantities of dangerous goods that may be travelling along the Port Botany Rail Freight and passing the site. This information will be useful to determine whether a risk study is required. ▪ In addition to the above comment, it is noted from Section 4.4 of the scoping report that site contamination from filling activities to underground petroleum storage tanks may be an issue. DPE queries the location of these underground petroleum storage tanks and whether they are still in use. If so, what is the	Each of the matters identified by the DPE (Hazards Branch) is responded to as follows: ▪ The Pipeline Hazard Assessment at **Appendix P** considers the future development of the site in relation to existing high pressure dangerous good gas pipelines. Consultation was held with Freyssinet and Qenos which identified that there would be no impact to the Jemena pipeline as a result of any subsequent future Development - refer to **Section 6.3.3**. ▪ ARTC has been approached regarding the movement of dangerous goods along the adjoining freight rail corridor. Consultation with ARTC is ongoing. ▪ The DSI confirms only one underground petroleum storage tank remains at the site, which is considered low risk for significant or widespread contamination - refer to Section **6.3.3.**

Key Issues	Proponent Responses
volume of these tanks. This information is to confirm these underground tanks would not cause issues to the proposal on hazard and risk ground.	
Jemena ▪ Jemena's Sydney Primary Loop high pressure natural gas pipeline is situated south of the subject site, between the railway line and northern side of Qantas drive. As such, there is no expected impact to the Sydney Primary Loop. ▪ Jemena does have low pressure distribution mains in Coward Street and Kent Road, so any development would need to consider the Guideline to designing, constructing, and operating around the existing AS4645 natural gas network at the time of construction.	The Service Infrastructure Report at **Appendix Q** includes consideration of Jemena's low pressure distribution mains in Coward Street and Kent Road. *Guideline to designing, constructing, and operating around the existing AS4645 natural gas network* must be considered at the time of construction.
Sydney Water Water and Wastewater Servicing ▪ Sydney Water has no objection to the proposed development. ▪ More detailed advice will be provided at the referral, feasibility and S73 application stages. ▪ We request that the proponent provides an ultimate and annual staging plan as part of the next lodgement in order for Sydney Water to effectively assess the impact on our assets and servicing capacity. Protection of Assets ▪ The proposed site is in the vicinity of Sydney Water's stormwater channel. Further advice from Sydney Water may be offered at exhibition, the feasibility or, S73 stages with regards to the protection of our existing assets/easements and any building over application requirements. This will be investigated as we receive more detail, and specific protection requirements,	The Sydney Water comments regarding the Water and Wastewater Servicing and Protection of Assets are acknowledged. The proponent will continue to engage with Sydney Water through the Planning Proposal process to ensure they are informed regarding the likely future demands and the potential future impacts on the stormwater channel. Further consultation will also be required at the DA stage once the final detailed design has been resolved.
SACL Sydney Airport supports the proposal in principle and, in particular, the proposed increases in FSR	An assessment against the guidelines outlined in the NASF is provided in the Aeronautical Impact

Key Issues	Proponent Responses
that would apply to the site for the land uses currently listed in Schedule 1. As the site immediately adjoins Sydney Airport's northern boundary, the National Airports Safeguarding Framework needs to be assessed in detail as part of the Planning Proposal, including Guidelines A, B, C, E, F and G. In response to the preliminary traffic assessment in the Scoping Proposal, Sydney Airport asks that: ▪ The need for the development to properly integrate with the proposed new active transport link between Sydney Airport's International (T1) and Domestic (T2/T3) terminal precincts and the broader Strategic Cycleway Corridor network should be included in the assessment. ▪ Any required car parking should be provided on the site itself as part of the future development, rather than at another off-site location. ▪ A strategic north-south bus corridor along O'Riordan Street connecting to Sydney Airport's Domestic (T2/T3) terminal precinct should be considered.	Assessment at **Appendix O** – refer to **Section 6.3.3.** The traffic and transport matters are addressed in the Transport Report at **Appendix D**. The indicative concept design provides for all car parking to be provided on-site. The north-south bus corridor is beyond the scope of the Draft Planning Proposal and is not considered reasonable or warranted based on the proposed plan amendments- refer **Section 6.3.3**.
Internal	
Council's Urban Designer To clearly establish the potential yield of the site a detailed site analysis outlining all site constraints (including easements, flooding, existing vegetation, services, topography, rights of way etc) should be provided to assist in establishing building envelopes. The resultant-built form diagrams should be sufficient to allow the potential FSR of the site to be clearly demonstrated (dimensioned forms with boundary setbacks and relative levels). The proposal should also be considered in the context of an Airport Master Plan, showing how existing airport related facilities located on the subject site will be relocated and the implications upon service roads currently located on and adjacent to the subject site. A resolved access and servicing strategy for the airport precinct must be demonstrated.	The indicative concept design is described in detail in **Section 4**. It clearly demonstrates the proposed FSR can be accommodated at the site, having regard to the site constraints and potential visual impacts - refer **Section 6.3.3.** The Transport Report confirms the existing truck access to the Qantas airside operations will be maintained via an internal connection to the Jet Base. Additional details are provided in the Urban Design Report which is also discussed in detail in **Section 6.3.3**. The Urban Design / Context Report at **Appendix C** details the staging of future development of the site as per the Airport Masterplan, refer **Section 4.3** of this report. The proponent is working closely with Qantas regarding access and service strategy between the site and the Airport precinct. A VIA has been prepared by Paddock Landscape Architects at **Appendix E**, which provides a

Key Issues	Proponent Responses
The proposal will be a substantial building in a very prominent / highly visible location. Consideration must be given to how building massing / articulation / material quality and landscaping can contribute to the aesthetic quality of the development.	comparative analysis of the existing and proposed FSR, demonstrating the Draft Planning Proposal will not result in a greater visual impact compared to the built form which could be realised in accordance with the current LEP - refer **Section 6.3.3**. The concept design seeks to accommodate high-quality warehouse and distribution centres that will provide a new benchmark for this building typology. The detailed design at the DA stage will provide further resolution of the building materials and will incorporate colours and materials of significance to local Indigenous peoples. Landscaping will also incorporate species of Indigenous significance and plants and the retention of existing mature planting along Qantas Drive, Kent Road and Coward Street will ensure the proposed development sits comfortably within the site.
<u>Council's Engineer</u> ▪ As the site is affected by high ground water levels and polluted flows from the Orica Site basement structures below ground for this property would not be permitted. ▪ A detailed Traffic Study would be required to ensure the development could be supported by the Local Road Network and did not adversely impact existing traffic movements in the area. Depending on the outcome of the Traffic Study Council and TfNSW may require various Traffic Management Devices to be constructed to manage the predicted traffic flows. Travel demand management needs to be considered with employees encouraged to use public transport to arrive to the site. Appropriate parking rates for the proposed uses on this site may need to be further investigated for suitability. ▪ The site is impacted by an existing Council stormwater pipe through the centre of the site and another pipe owned by Sydney Water along the southern boundary which discharges into the Alexandra Canal. See attached plan. These pipes to be considered with the overall drainage system for the site. Building over Council pipes is prohibited in the Botany Bay DCP Part 10 – Stormwater Management	Each of the matters identified by the DPE (Hazards Branch) is responded to as follows: ▪ The indicative concept design does not provide for basement car parking as outlined in **Section 4**. ▪ The Transport Report confirms the development could be supported by the local road network, will not adversely impact existing traffic movements in the area and provides for car parking in accordance with Council requirements - refer **Section 6.3.3**. ▪ The Council stormwater drainage pipe and Sydney Water stormwater asset are considered in the context of the overall drainage system for the site as discussed in the Civil Engineering Report by Costin Roe at **Appendix J.** Sydney Water was consulted in the preparation of the Civil Engineering Report. ▪ The Civil Engineering Report outlines the proposed stormwater quality management strategy to be incorporated as part of any future development of the site. ▪ Any requirement for a truck washdown facility would be addressed at the DA stage. ▪ The future cycle paths along Coward Street are acknowledged and would enhance active mode

Key Issues	Proponent Responses
Technical Guidelines. The Council pipe needs to be accurately located to council satisfaction. ▪ All Stormwater runoff from the site to be recycled, stored in tanks and piped to all Amenity Facilities. Any excess runoff to be used for the irrigation of all on-site landscaping areas. Design of the stormwater drainage system is to comply with Botany Bay DCP Part 10 – Stormwater Management Technical Guidelines. ▪ If a truck wash down area is proposed it be passed through and approved Sydney Water Treatment Plant and piped to the sewer and not into the stormwater system. ▪ Coward Street is a designated east west cycle route in accordance with Council's Cycleway Strategy Plans. To improve this cycleway a 2.5m wide contraflow cycleway to be constructed from the face of the kerb along the southern side of Coward Street the full length of this property. This will require the removal of all kerb side parking on this side of Coward Street so all Staff Parking to be incorporated inside the Development Site. ▪ The largest size service vehicle (truck) accessing the site shall be nominated. All vehicular access points and internal circulation shall be designed to accommodate the largest vehicle in accordance with AS2890.2:2018. Swept path analysis shall be provided through the car parking facility for passenger vehicles and truck vehicles as outlined in the applicable Australian Standards. ▪ Vehicular Access to Coward Street (classified as a Collector Road) is discouraged by council given the site has vehicular access to a lower priority road (Kent Road - classified as a Local Road). All vehicular ingress/egress for this development shall be obtained from Kent Road. ▪ Undergrounding of all overhead wires along the frontage of the development site to Coward Street and Kent Road is required in accordance with Botany Bay DCP Part 6 (6.3.8 Site Facilities – control C3).	accessibility to the site. Further, the concept designs include end of trip facilities to service cyclist needs. It is not intended for staff car parking to be on-street. The concept designs provide for all staff carparking incorporate on-site. ▪ The Transport Report confirms the future development can accommodate the required vehicle movements. This will be addressed in further detail at the DA stage. ▪ The Transport Report justifies the proposed vehicle access arrangements based on the scale of development, separation of heavy and light vehicles and expected number of parking spaces. The identified access arrangements were discussed with Council officers at a meeting on 21 March 2023. ▪ The undergrounding of the existing overhead wires will be addressed at the DA stage. ▪ An ESD report has been prepared which outlines the strategies and commitments made for future development of the site, including stormwater re-use, solar energy, EV charging and sustainable materials - refer **Section 6.3.3**.

Key Issues	Proponent Responses
▪ Sustainability measures need to be seriously considered as part of this development which shall include, but not be limited to, the following: a. Maximisation of the capture of stormwater for non-potable stormwater re-use throughout the development which includes landscape irrigation, wash bays and toilet flushing. b. Maximisation of the use of the roof area for solar energy generation and green roofs to reduce urban heat island impact. c. Provision for EV charging for employee car parking and for EV truck loading bays. d. Consideration for adoption of sustainable building materials such as timber and the use of blast slag, fly ash or other pozzolan admixtures in concrete to minimise cement and reduce embodied carbon.	
<u>Council's Strategic Floodplain Engineer</u> Council's existing flood model (MRE 2015) indicates that the development sites are affected by 1% and PMF flood event. A Flood Advice Letter must be obtained for all lots from Council prior to the preparation of a Planning Proposal for the site. The habitable and non-habitable floors will need to be set at the specified flood planning level. The flood-related development controls and other flood-related requirements that affect the site will be detailed in Council's Flood Advice Letter. The flood impacts due to the proposal on the floodplain need to be assessed using a 2D flood model (TUFLOW). Flood hazard (ARR 2019), depth, level, and velocity afflux due to the proposed development for all events up to the PMF event shall be determined. A detailed flood impact assessment report shall be provided to demonstrate that the development: • does not divert floodwaters to the detriment of elsewhere on the floodplain. • does not increase flood level or velocity elsewhere on the floodplain (flood level increase shall not exceed 10mm in 1% AEP event)	The proponent will continue to engage with Council regarding the flood requirements and considerations throughout the DA stage. The Flood Impact Assessment prepared by Costin Roe Consulting (refer **Appendix J**) includes a TUFLOW assessment. The TUFLOW modelling and assessment confirms there is negligible impact on upstream, downstream and/ or adjoining sites as a result of future development of the site. The Flood Impact Assessment also concludes sufficient flood conveyance is available, post development, during the 1% AEP and PMF flood event. The majority of the existing overland flow path through the site from Kent Road is captured in a drainage apron and will be conveyed towards the Sydney Water channel south of the site. The remainder of the overland flow path through the site from Kent Road to Coward Street is routed through the undercroft carpark and is maintained. Discharge from the site is sent to the Sydney Water channel running between the lots. All buildings as proposed in the concept designs are sited 500mm above the 1% AEP flood level.

Key Issues	Proponent Responses
• does not result in a detrimental loss of flood storage. • reduces the existing flood hazard, where possible.	

4. Indicative Concept Design

This section of the report describes the indicative concept design prepared by Lacoste + Stevenson and Paddock Landscape Architects to demonstrate the way in which the site could be redeveloped in accordance with the draft Planning Proposal, including the 2:1 FSR and the additional permitted uses.

4.1. Development Overview

The concept design provides for a multi-level warehouse and distribution centre development, including two separate buildings across the QF1 and QF2 sites. Complementary land uses are proposed along the Coward Street frontage to activate the streetscape and provide a high-level of amenity for future workers and visitors to the site and immediate locality. The concept scheme includes:

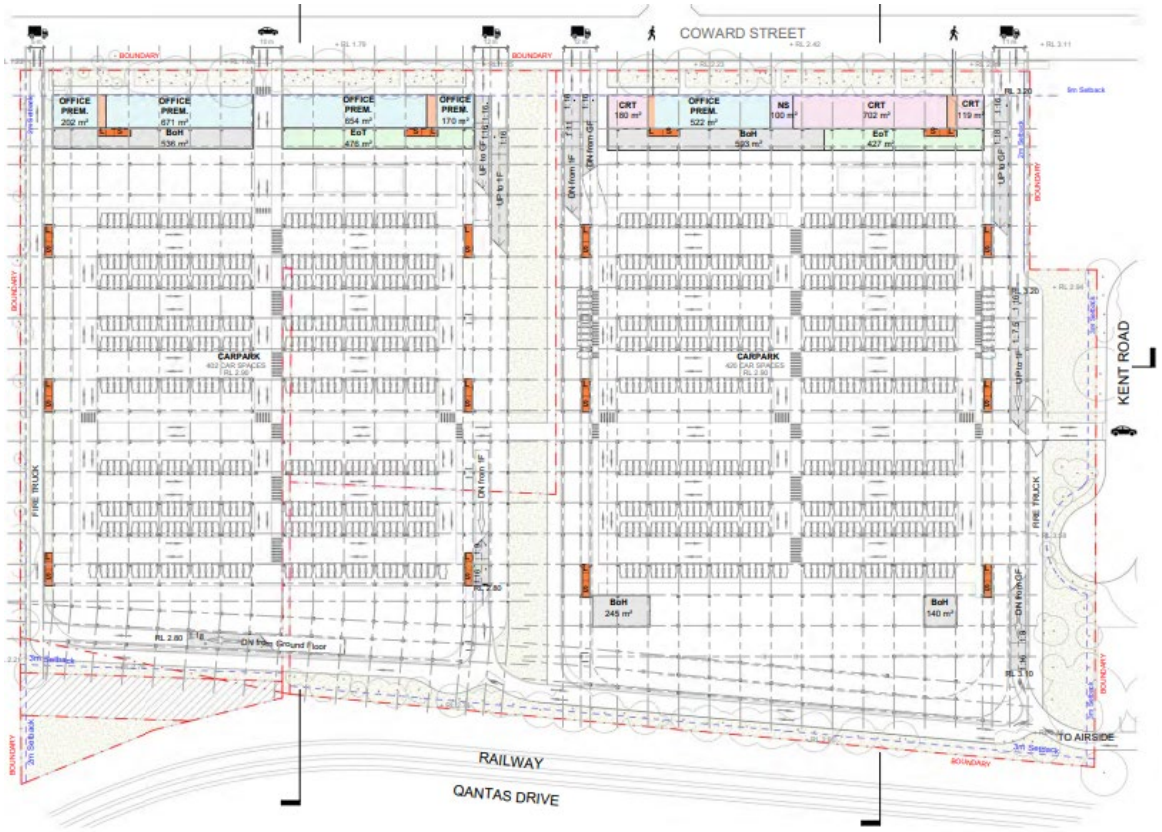
- Four levels of warehouse or distribution centre tenancies with ancillary offices and associated loading and manoeuvring areas accessed via a vertical access ramp.
- Office premises, café or restaurant, take-away food premises and a neighbourhood shop along the Coward Street frontage to activate the primary street frontage and provide opportunities for workers and visitors to gather, socialise and access convenience-based services.
- Indoor and outdoor recreation facilities on the upper levels of the building facing Coward Street, providing health and wellbeing opportunities for workers within the future development and immediate locality.
- Ancillary car parking in multiple locations across the site to meet the demands generated by workers within the warehouse and ancillary office components and visitors to the site.

Key numerical details of the concept design are provided at **Table 5**. The key design elements are explored further in **Section 4.2** and having regard to the Urban Design / Context Report prepared by Lacoste + Stevenson (**Appendix C**).

Table 5 Key Numeric Details

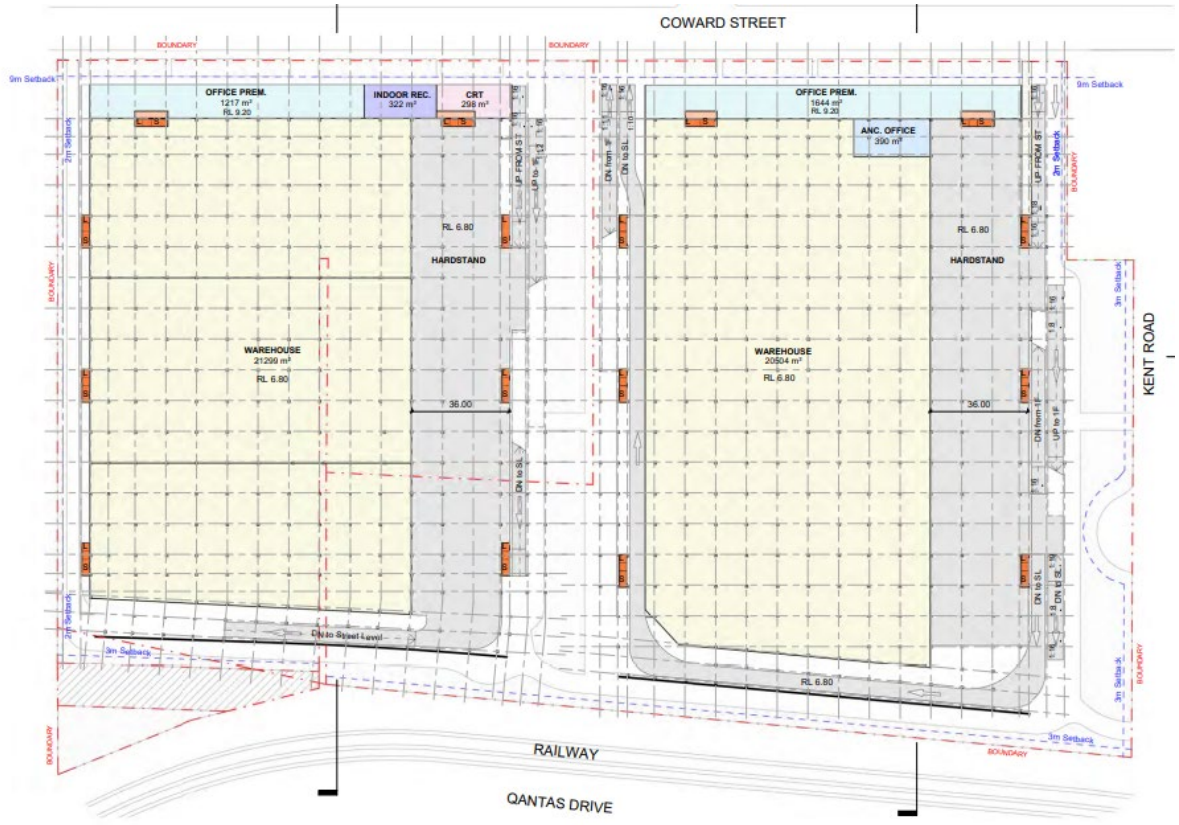
Element	**Indicative Development Outcome**
Land Use	▪ Warehouse or Distribution Centre (with Ancillary Offices): 178,436 m² ▪ Office Premises: 5,080m^2 ▪ Café / Restaurant / Take Away: 1,299m^2 ▪ Neighbourhood Shop: 100m^2 ▪ Recreation Facility (Indoor): 1,966m^2 ▪ Recreation Facility (Outdoor): 1000m^2 (nb roof-top location)
Total Gross Floor Area	▪ QF1: 92,751 m² ▪ QF2: 96,380 m² ▪ Total (QF1 and QF2): 189,131m²
Floor Space Ratio	2:1
Building Height	44 metres

Figure 8 Lower Ground Floor Plan



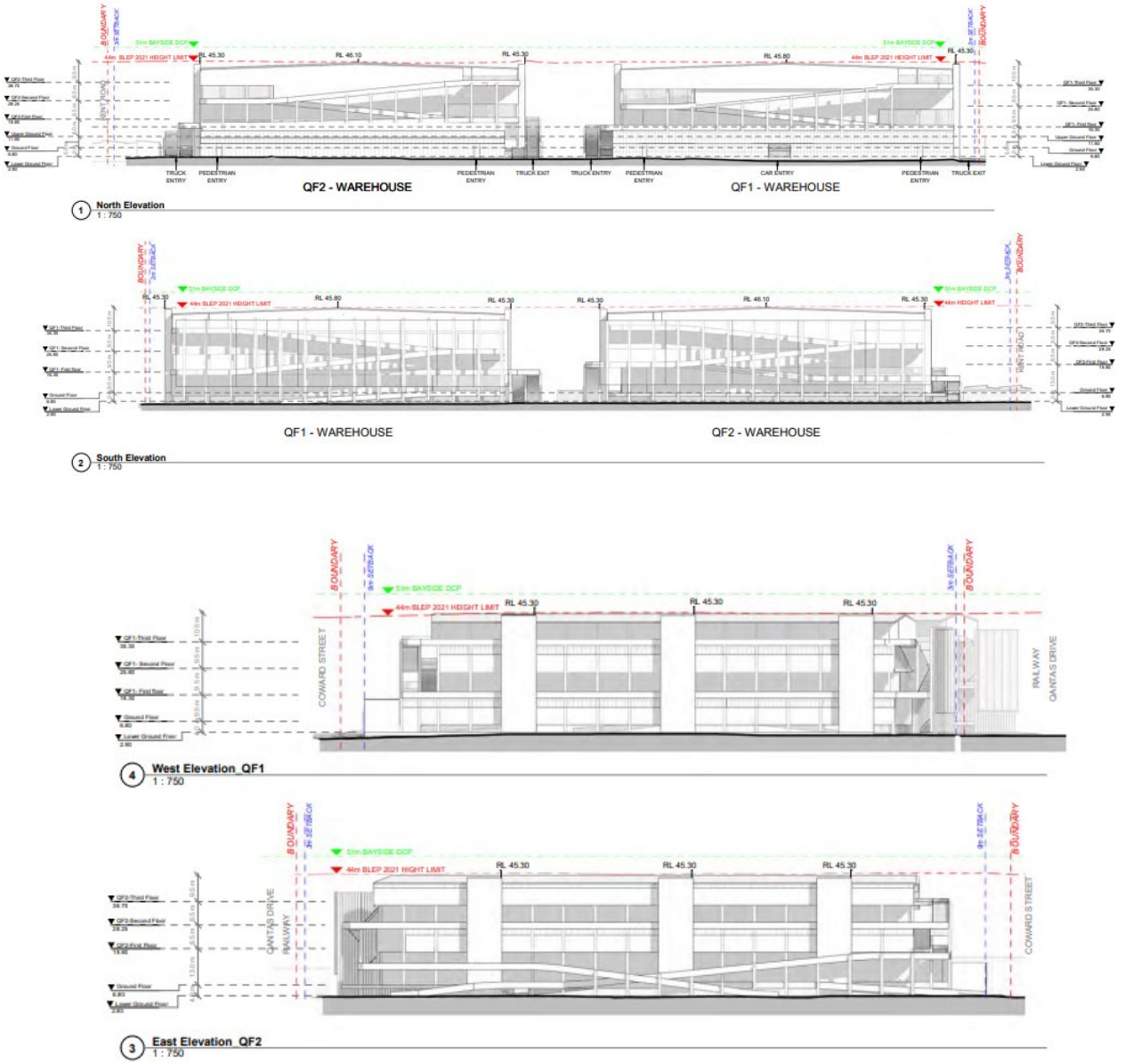
Source: Lacoste + Stevenson, 2023

Figure 9 Ground Floor Plan



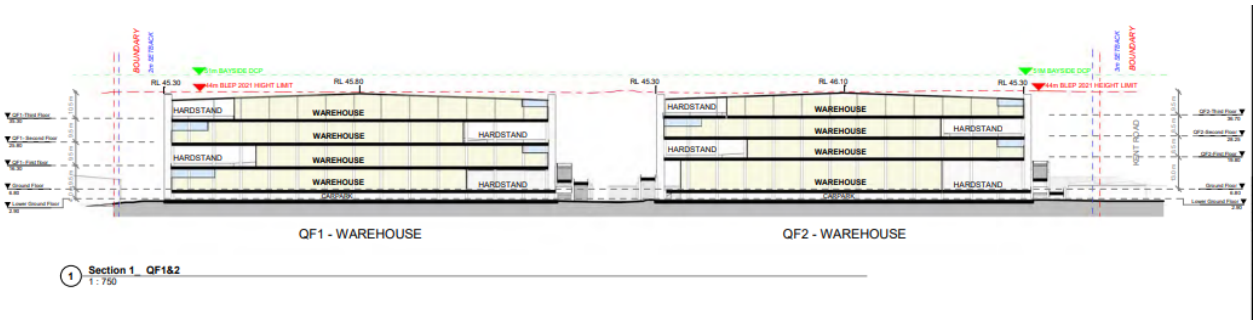
Source: Lacoste + Stevenson, 2023

Figure 10 Building Elevations



Source: ***Lacoste + Stevenson, 2023***

Figure 11 East-West Sections



Source: ***Lacoste + Stevenson, 2023***

4.2. Design Rationale and Key Features

The Draft Planning Proposal and the accompanying indicative concept design has been informed by the Connecting with Country Framework prepared by Cox Inall Ridgeway (refer **Appendix U**), which was commenced in association with the State Significant Development Application (**SSDA**) process for the redevelopment of QF3 at 297 King Street, Mascot.

The Connecting with Country Framework will be implemented as part of subsequent design stages for future development at the site. The key principles within this framework include –

1. **Aboriginal Voices** - creation of spaces and places for multiple stories, voices, and histories through design approaches.
2. **Traditional Flora** - embedding principles of environmental sustainability in the design including through restoring and the selection of native plants of cultural significance to the Kamay Botany Bay region.
3. **Colours that relate to Country** - design which incorporates colours of significance, such as the ochres to represent the earth and the sandstone, white of the sand and blues of the ocean.

The indicative concept design includes Public Art screens along the length of the southern façade of each building facing Qantas Drive, which will be a platform for significant Aboriginal artwork communicating a visually engaging connection to Country through patterns, designs and/or textures. Other 'Connecting with Country' initiatives will be developed and incorporated into the future development as the consultation with Indigenous knowledge holders continues through the design development phase.

A summary of the key features of the indicative concept design are summarised below:

- **Land Use Activities**: the proposed complementary land use activities can be accommodated on-site and will enhance the appearance and amenity of the future development.
- **Built Form and Urban Design**: the potential built form is consistent and compatible with the locality and will not result in any major impacts compared to the potential built form in accordance with the current controls. The indicative design provides for a high-quality warehouse and distribution centre that will provide a new benchmark for this building typology.
- **Design Excellence**: the concept schemes have been designed to meet the design excellence criteria as outlined in the BLEP 2021. The schemes demonstrate a high standard of architectural design, improve the quality and amenity of the public domain, will not detrimentally impact view corridors and meet the requirements of the BDCP 2022. This will be further refined throughout the detailed design stage of any future development application.
- **Public Art**: Cultural Capital has prepared a Curatorial Vision Framework (refer **Appendix F**) that applies to all of LOGOS' landholdings in Mascot and will guide the future public art works**.** The framework seeks to provide large facade artworks expressing Aboriginal Connection to Country along a 700-metre-long journey of integrated artworks proposed on buildings QF1 - QF4.
- **Landscape and Tree Management**: the concept design provides for a landscape area of 11.1%. A generous landscape area within the front setbacks along Coward Street and Kent Road includes concentrations of tree species. Generous landscaped area between the two buildings providing a 'green spine' that incorporates active and passive use spaces. Kent Road will include a deep landscape frontage with areas of public access to supplement surrounding public open space areas.
- **Transport and Access**: Heavy vehicle access is located off Coward Street with separate entry and exit driveways located for each structure. Light vehicle access is from Kent Road and Coward Street, servicing the car parks located on the lower ground floor under the warehouse structures. Truck access is proposed around the perimeter of the warehouse ensuring a one-way circulation route up and down each building. Truck movements will animate the facade of the buildings. Pedestrian access is primarily via Coward Street with secondary access via Kent Road. Internal pathways provide clear and direct connections between the site entries and the building lobbies.
- **Stormwater Management**: Stormwater detention and on-site treatment areas are located primarily within the central landscape area between the two structures, with discharge into existing Sydney Water channel along the southern boundary.
- **Sustainability**: ESD principles have been included in the concept designs. This including natural light and ventilation to offices and warehouse spaces, end of trip facilities to reduce transport emissions,

incorporation of WSUD principles and native species mix in the landscape design, and PV solar array proposed for the roof of each warehouse.

- **Amenity Impacts**: the proposed concept schemes provide for a new public space along the Coward Street frontage that will clearly define the entry to the site for pedestrians and cyclists. The additional uses on Coward Street will benefit the locality providing active ground floor retail services that deliver amenity to the site, future workers, and the broader Mascot area. These uses will also deliver improvements to the existing streetscape and site appearance and infrastructure upgrades which benefit the site and locality.

The proposed development scheme is indicative and would be further detailed at the development application stage. However, the indicative concept design demonstrates the proposed FSR control of 2:1 and additional land uses can be accommodated on the site. The compliance of the indicative concept design is addressed in further detail in **Section 5** of the report.

4.3. Development Staging and Infrastructure Upgrades

The future development is intended to be delivered in two distinct phases (Stages 1 & 2, followed by Stage 3) to accommodate the leaseback arrangements with Qantas, including the continued operations of the Qantas SDC, refer **Figure 12** and **Figure 13.**

It is expected each stage would have an estimated capital investment value exceeding $50 million and accordingly, an SSDA will need to be prepared and lodged with DPE in accordance with *State Environmental Planning Policy (Planning Systems) 2021*.

Project commencement would depend upon the outcome of the Planning Proposal and determination of the SSDA. The first phase of work would comprise demolition of the existing structures and hardstand areas in the eastern and south-western part of the site and construction of a temporary car park in the south-western corner to service the Qantas SDC (Stage 1). It would also include the construction, fit-out and occupation of the first multi-level warehouse building on the eastern part of the site (Stage 2).

Stage 3 will be delivered upon the cessation of the Qantas SDC activities and demolition of the existing warehouse building and temporary car park. The construction, fit-out and occupation of the second warehouse and distribution centre building will then be delivered on the western part of the site.

The proposed staging will preserve direct access (via easement) from the Qantas SDC and links directly to the Airport precinct. The proposal will also preserve the existing arrangements for the adjoining land (Dnata operations) to maintain direct access to the Airport precinct. Other key Qantas facilities currently located at the site are the process of being relocated, such as the Qantas training facility with construction underway at the nearby 28-30 Burrows Road, St Peters facility. Stage 2 and 3 of the development include the provision of access from QF2 to the airside link road network to permit airport related businesses to operate within the proposed development.

Utility services will be delivered in response to the staged redevelopment of the site and further detailed feedback from the relevant authorities regarding the existing services infrastructure and any required upgrades to meet the demands of the future tenants. Preliminary investigations have confirmed the site is well-serviced, with substantial utility services infrastructure within the locality (refer **Section 6.3.4**).

Transport improvements will be implemented in response to the increased traffic generation and as outlined within the Transport Report (refer **Section 6.3.3**). Modifications to the Kent Road and Coward Street intersection are required to accommodate estimated traffic levels expected from future development of the site, including:

- Reconfiguration of the Coward Street western approach to provide a separate left turn lane and shared through and right turn lane;
- Extension of the no stopping restriction on the Coward Street western approach; and
- Extension of the no stopping restriction on the Kent Road southern approach.

The proponent has also considered the broader public benefits that may be delivered through the Draft Planning Proposal. These matters are addressed in further detail in **Section 5.3** of this report.

Figure 12 Staging Plan for Future Development of the Site

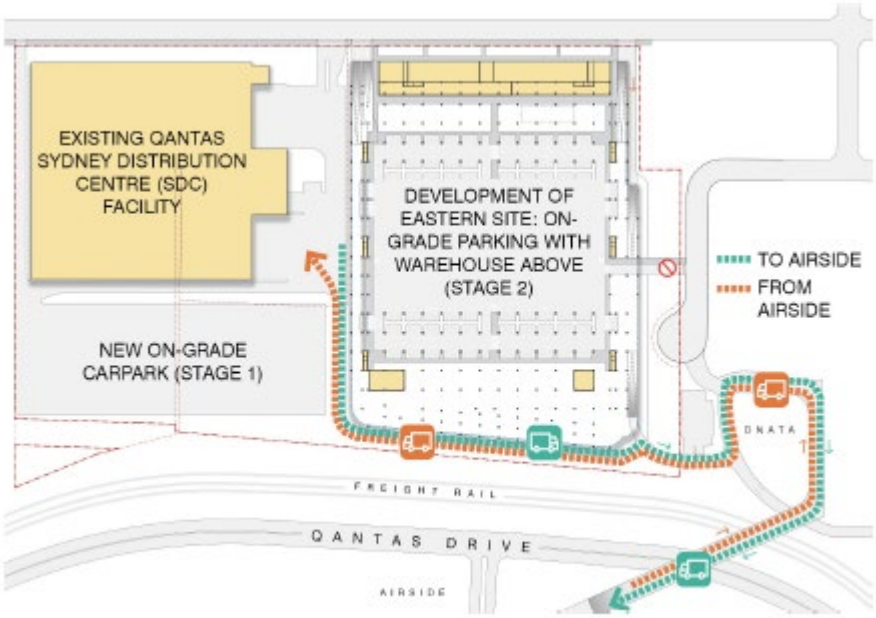
Picture 7 Stages 1 & 2

Source: ***Lacoste + Stevenson, 2023***

Picture 8 Stages 1 & 2

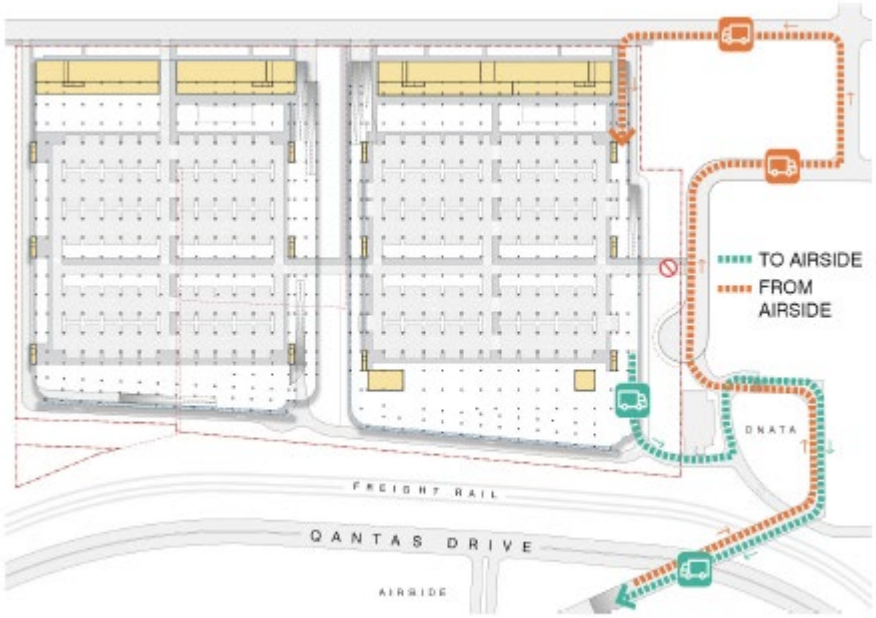
Source: ***Lacoste + Stevenson, 2023***

Figure 13 Staging Plan: Access and Servicing Strategy



Picture 9 Diagram showing proposed connections to ‘airside’ and existing road networks within Stages 1 and Stage 2

Source: ***Lacoste + Stevenson, 2023***



Picture 10 Diagram showing connections to ‘airside’ and existing road networks within the Stage 3

Source: ***Lacoste + Stevenson, 2023***

5. Statutory Context

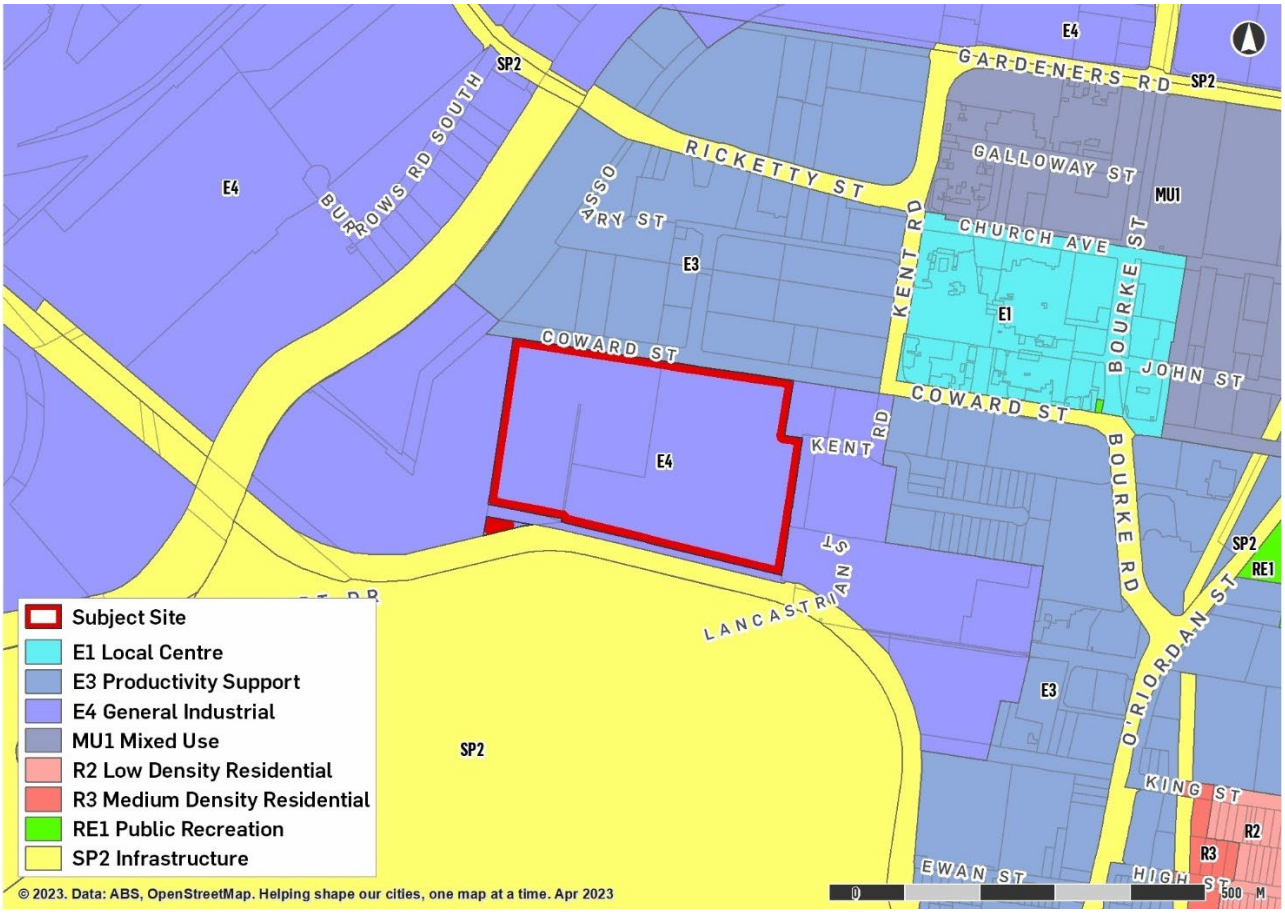
This section of the report identifies the core local planning controls which currently apply to the site. A preliminary compliance assessment of the indicative concept design has been undertaken to identify the BLEP 2021 provisions which need to be updated by the Planning Proposal.

The preliminary compliance assessment also demonstrates the proposal will comply with the current BDCP 2022 provisions which apply to the site, negating the need for a site-specific DCP to facilitate the delivery of the future development in accordance with the amended BLEP 2021 controls.

5.1. Bayside Local Environmental Plan 2021

Bayside Local Environment Plan 2021 (**BLEP 2021**) is the primary environmental planning instrument for the site. The site is zoned E4 General Industrial as shown in **Figure 14**. The zone objectives and permitted uses are shown in **Table 6**, including a preliminary assessment of the indicative concept design.

Figure 14 Land Zoning Map



Source: Urbis, 2023

Table 6 E4 Zone Provisions

Provision	Complies
Objectives of the zone ▪ *To provide a wide range of industrial and warehouse land uses.* ▪ *To encourage employment opportunities.*	The indicative concept design complies with the objectives for the E4 General Industrial zone. The development as outlined within the concept would deliver critically needed industrial and warehouse land uses and employment close to Sydney CBD, Sydney Airport and Port Botany.

Provision	Complies
▪ *To minimise any adverse effect of industry on other land uses.* ▪ *To support and protect industrial land for industrial uses.*	The complementary uses represent a minor proportion of the total floorspace (5%) and would not impact on the delivery of industrial floorspace on the site or the surrounding land.
Permitted without consent *Nil*	N/A
Permitted with consent *Depots; Freight transport facilities; Garden centres; General industries; Goods repair and reuse premises; Hardware and building supplies; Industrial retail outlets; Industrial training facilities; Kiosks; Light industries; Local distribution premises;* ***Neighbourhood shops****; Oyster aquaculture;* ***Take away food and drink premises****; Tank-based aquaculture; Timber yards;* ***Warehouse or distribution centres****; Any other development not specified in item 2 or 4*	The Draft Planning Proposal seeks to introduce additional permitted uses on the site which are appropriate based on the scale of the warehouse activity, the opportunity to activate the streetscape along the extensive frontage of the site to Coward Street and the need to provide for a high level of worker amenity, including social gathering and health and wellness opportunities. It is acknowledged that these uses may not be appropriate on all land zoned E4 General Industrial and accordingly, it is not proposed to update the E4 zoning provisions. Rather, it is proposed to update Schedule 1 to facilitate the permissibility of additional specified activities on this site, including: ▪ Office Premises ▪ Café or Restaurant ▪ Recreation Facility (Indoor) ▪ Recreation Facility (Outdoor)
Prohibited *Advertising structures; Agriculture; Air transport facilities; Airstrips; Amusement centres; Boat launching ramps; Boat sheds; Camping grounds; Caravan parks; Cemeteries; Centre-based child care facilities; Charter and tourism boating facilities;* ***Commercial premises****; Community facilities; Correctional centres; Eco-tourist facilities; Educational establishments; Entertainment facilities; Environmental facilities; Environmental protection works; Exhibition homes; Exhibition villages; Extractive industries; Farm buildings; Forestry; Function centres; Health services facilities; Heavy industrial storage establishments; Heavy industries; Helipads; Highway service centres; Home-based child care; Home businesses; Home occupations; Home occupations (sex services); Information and education facilities;*	As outlined above, it is proposed to create a planning approvals pathway for additional land use activities on this site which are currently prohibited under the E4 zone provisions including: ▪ Office Premises (which are captured under the group term ‘commercial premises’) ▪ Café or Restaurant (which were previously permitted with consent in the IN1 General Industrial zone but are now prohibited under the group term ‘commercial premises’) ▪ Recreation Facility (Indoor) ▪ Recreation Facility (Outdoor) Further detailed justification for this approach is provided in **Section 6.3.1.**

Provision	Complies
Jetties; Marinas; Moorings; Mooring Pens; Open cut mining; Passenger transport facilities; Port facilities; Public administration buildings; ***Recreation facilities (indoor)****; Recreation facilities (major);* ***Recreation facilities (outdoor)****; Registered clubs; Residential accommodation; Respite day care centres; Restricted premises; Rural industries; Tourist and visitor accommodation; Veterinary hospitals; Water recreation structures; Wharf or boating facilities*	

The Planning Proposal does not seek to make any changes to the E4 General Industrial zone provisions, including the zone objectives, permitted uses and prohibited uses. The additional land use activities in the concept design are proposed to be listed in a new clause under Schedule 1, enabling these specific land uses to be permitted on the site as outlined further within this report.

The additional clauses which are relevant to the site and the potential future development as shown in the indicative concept design are listed and discussed in the following table.

Table 7 Additional LEP Clauses

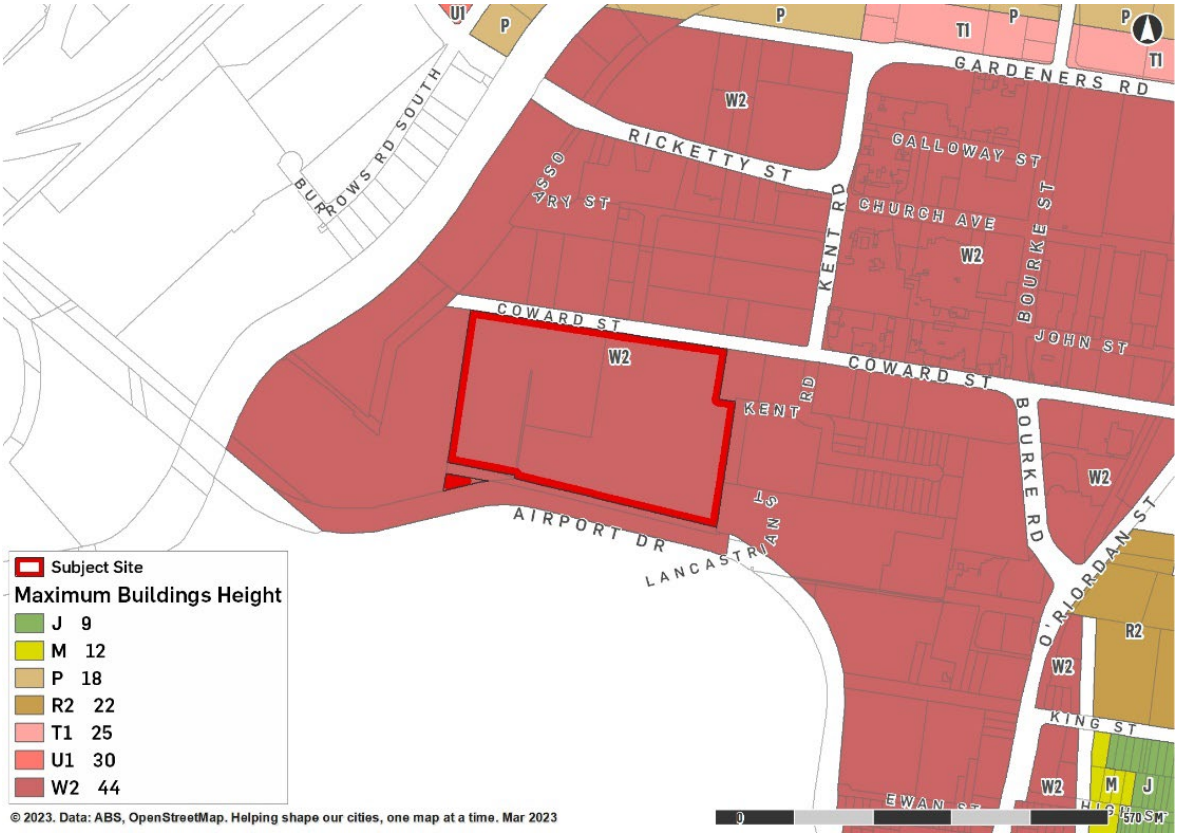
Provision	Complies
Height of Buildings (clause 4.3) 44 metres - refer **Figure 15**	Yes - the indicative concept design has demonstrated the proposed FSR of 2:1 can be accommodated with the current maximum height of building control. Accordingly, the Draft Planning Proposal does not seek a change to the building height control.
Floor Space Ratio (clause 4.4) ▪ 1.2:1 - clause 4.4(2) – refer **Figure 16** ▪ 1.5:1 - clause 4.4(2B) and clause 14 in Schedule 1 (refer below)	No - the Draft Planning Proposal seeks to increase the FSR control to 2:1 in accordance with the FSR Map under section 4.4(2). It is also proposed to delete the site from the clause 14 provisions linked to clause 4.4(2B) to avoid any ambiguities regarding the maximum floorspace which is permitted on the site.
Miscellaneous Permitted Uses (clause 5.4) Neighbourhood shops - maximum retail floor area of 100m^2	Yes – one neighbourhood shop is proposed which has a maximum GFA of 100m^2. Accordingly, the Draft Planning Proposal does not seek a change to the miscellaneous permitted uses controls.
Heritage Conservation (clause 5.10) The site is not identified as a local heritage item or located within a heritage conservation area – refer **Figure 17**. However, there several listed items in the locality including:	Yes - a HIS has been prepared by Urbis to assess the potential impacts associated with the Planning Proposal. An Aboriginal Objects Due Diligence Assessment has also been prepared to understand the aboriginal significance of the site, including any

Provision	Complies
▪ Local Heritage Item I298: Commonwealth Water Pumping Station and Sewage Pumping Station No 38 located south of the site. ▪ Local Heritage Item I382: Ruins of the former Botany Pumping Station located south of the site. ▪ Local Heritage Item I383: Sydney (Kingsford Smith) Airport group located south of the site. ▪ State Heritage Item I260: Alexandra Canal (including sandstone embankment) located west of the site.	objects or places potentially located within the site area (refer **Section 6.3.3**).
Flood Planning (clause 5.21) Development consent must not be granted unless the consent authority is satisfied the development will satisfy the relevant flooding provisions.	The Civil Engineering Report / Flood Assessment demonstrates the relevant provisions can be accommodated within the future development, including the increased floorspace associated with the FSR uplift and the additional permitted uses along Coward Street. The modelling and assessment in the Civil Engineering Report confirm there is negligible impact on upstream, downstream and/ or adjoining sites as a result of the proposed development. This will be addressed in detail at the DA stage and based on the final detailed design.
Acid Sulfate Soils (clause 6.1) Class 2	An Acid Sulfate Soils Management Plan will be prepared at the DA stage to address any works below the natural ground surface or works by which the watertable is likely to be lowered.
Earthworks (clause 6.2) Earthworks for which development consent is required will not have a detrimental impact on environmental functions and processes, neighbouring uses, cultural or heritage items or features of the surrounding land.	The indicative concept design in **Section 4** shows the indicative levels, demonstrating the future development of the site can comply with the relevant requirements. This will be addressed in detail at the DA stage and based on the final detailed design.
Stormwater and Water Sensitive Urban Design (clause 6.3) Before granting development consent, the consent authority must be satisfied the development will satisfy the relevant stormwater provisions and water sensitive urban design principles.	The Civil Engineering Report prepared by Costin Roe indicates that stormwater management system will comprise a minor and major system to convey collected stormwater run-off to the legal point of discharge and be designed in accordance with Bayside Council's requirements and specifications. This will be addressed in detail at the DA stage and based on the final detailed design.

Provision	Complies
Airspace Operations (clause 6.7) The consent authority must not grant development consent to development that is a controlled activity within the meaning of Division 4 of Part 12 of the *Airports Act 1996*	The indicative concept design demonstrates the proposed FSR uplift can be accommodated within the existing 44 metre height control. The Aeronautical Impact Assessment indicates the likely future buildings will not impact on the airspace operations. However, further consultation will be required with the relevant authorities at the DA stage and having regard to the potential impact of cranes during the construction process.
Development in Areas Subject to Aircraft Noise (clause 6.8) In deciding whether to grant development consent, the consent authority must consider the aircraft noise provisions.	The Acoustic Assessment confirms the typical commercial and industrial façade constructions are expected to achieve the required internal aircraft noise levels. The report notes land uses on the building facades or roof tenancy must be designed to achieve the required internal aircraft noise levels. A detailed acoustic assessment will be undertaken as part of any future DA to determine the required building constructions for the proposed design.
Design Excellence (clause 6.10) Development consent must not be granted unless the consent authority considers that the development exhibits design excellence.	The Urban Design / Context Report includes an assessment of the concept designs against the design excellence criteria outlined in the BLEP 2021. The assessment indicates the indicative concept design demonstrates the proposed 2:1 FSR uplift can be accommodated on-site and comply with the principles that demonstrate design excellence. Refer to **Appendix C** for a comprehensive assessment against clause 6.10.
Essential Services (clause 6.11) Development consent must not be granted unless the consent authority is satisfied that services that are essential for the development are available or that adequate arrangements have been made to make them available when required.	The Service Infrastructure Assessment confirms the site is well-serviced, with substantial utility services infrastructure within the locality.
Schedule 1 Additional Permitted Uses The site is shown on the Additional Permitted Uses Map – refer **Figure 18**. The written component (clause 14) provides for additional permitted uses to be accommodated on the site, including: Specified land use activities below but only where the activity relates to use of the Sydney Airport: ▪ Commercial premises.	Clause 14 in Schedule 1 relates to Qantas ownership of the land. As a result of Qantas disinvestment of the site, this clause is no longer applicable. The proposed updates to clause 14 in Schedule 1 would 'de-link' the site from the provisions which were originally proposed by Qantas in accordance with their operations. The new clause in Schedule 1 will facilitate a planning approvals pathway for complementary land use activities which would not otherwise be

Provision	Complies
▪ Function centres. ▪ Information and education facilities. ▪ Passenger transport facilities. ▪ Tourist and visitor accommodation. ▪ Any other building or place used only for purposes that relate to the use of Sydney Airport. A building or place used for provision of any of the following services: ▪ Services related to any of the following uses carried out at Sydney Airport: ▪ Assembly, storage or land transport of air freight. ▪ Accommodation, or transportation by air or land, of air passengers or air crew. ▪ Storage, operation, maintenance or repair of aircraft or aircraft components. ▪ Administrative functions associated with the airport, such as airport management and security ▪ Functions of government departments and authorities related to air passengers and air freight. ▪ Services provided for hotel or motel guests, including banking, dry cleaning, hairdressing and the like, that are located within the confines of the hotel or motel building. The consent authority must consider whether the development is likely to support the role of Sydney Airport and environs as a transport gateway and/or is likely to compromise the viability of adjoining industrial uses.	permitted on land within the E4 General Industrial zone. These additional permitted uses will enhance the attractiveness of the site for future tenants while maintaining the integrity and primary significance of industrial and warehouse development on the site.

Figure 15 Height of Buildings Map

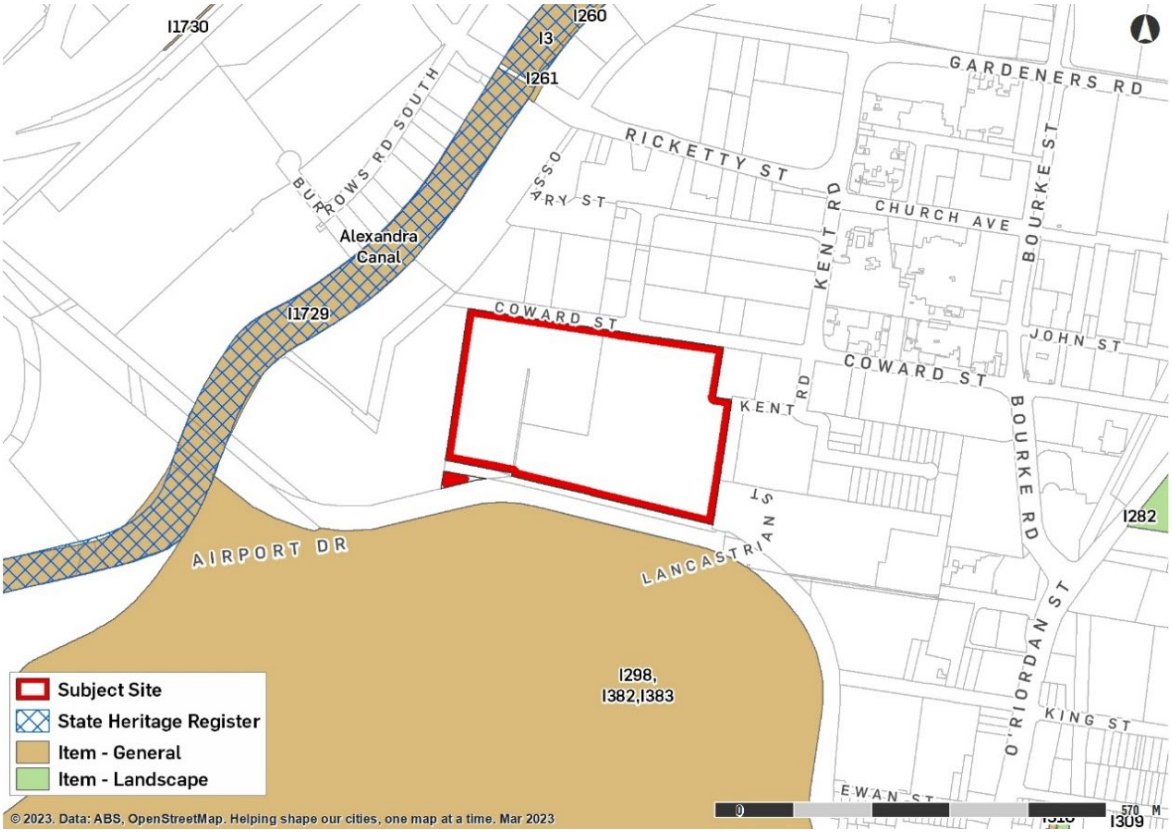


Source: Urbis, 2023

Figure 16 Floor Space Ratio Map

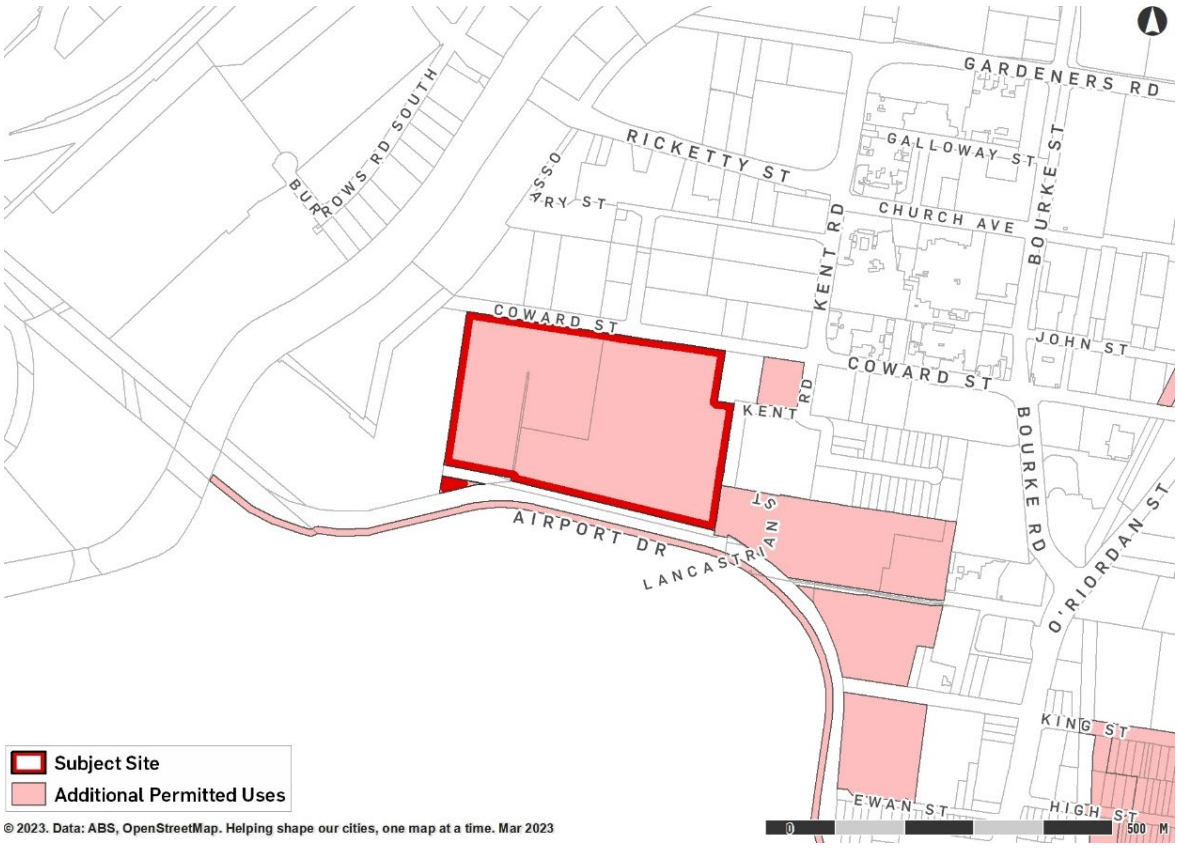
Source: Urbis, 2023

Figure 17 Heritage Map



Source: Urbis, 2023

Figure 18 Additional Permitted Uses Map



Source: Urbis, 2023

5.2. Bayside Development Control Plan 2022

Bayside Development Control Plan 2023 (**BDCP 2022**) became effective on 10 April 2023 and provides the detailed development controls which apply to land across the Bayside LGA. The key controls relevant to the site and their consideration in the indicative concept design for QF1 and QF2 are summarised in **Table 8**.

The purpose of this preliminary compliance assessment was to test whether the proposed FSR of 2:1 could be accommodated on the site in accordance with the current DCP controls. Based on this assessment, it is concluded that the future development can achieve a high level of compliance in accordance with the existing controls and a site-specific DCP is not warranted or necessary to accompany the draft Planning Proposal.

Table 8 Summary of Relevant DCP Provisions

Reference	Provision	QF1 and QF2 Concept Designs	Complies
3.1.5 - Views	C1: Development must consider any significant vistas or views to, from and across the site including those which contribute to the character, identity, or sense of place of the site.	A VIA is provided at **Appendix E** which details the potential view impact of future development as provided for in the concept designs. The assessment indicates the indicative concept design (and the associated 2:1 FSR control in the Draft Planning Proposal) will not result in unacceptable view loss and will not obstruct views any more than the existing 1:2 FSR control.	Yes
3.2 - Design Excellence	C1: Development is to give consideration to the principles of design excellence as outlined within Clause 6.10 of *Bayside Local Environmental Plan 2021* and within Council's Design Excellence Guidelines.	The indicative concept design demonstrates the Draft Planning Proposal can deliver a development which can comply with the relevant provisions in clause 6.10 of BLEP 2021. It demonstrates the site is suitable for the proposed future development and the mix of land uses is appropriate, including the additional permitted uses under Schedule 1. The detailed technical studies accompanying the Draft Planning Proposal provide a detailed assessment of the potential environmental impacts and demonstrate there will be positive social and economic impacts associated with the delivery of additional industrial floorspace and complementary land use activities. The indicative concept design will be further refined as part of any future DA, including a comprehensive assessment of the architectural design, materials and detailing required as part of a comprehensive assessment package.	Yes

Reference	Provision	QF1 and QF2 Concept Designs	Complies
3.5.3 - On-site Car Parking Rates *Table 3: Car Parking Rates*	**Warehouse and distribution centres:** one space per 300m2 GFA, **Plus** **Ancillary offices:** one space per 80m2 GFA	**QF1 total required car park spaces:** 402 spaces **QF1 total carparking spaces provided:** 402 spaces **QF2 total required car park spaces:** 420 spaces **QF2 total carparking spaces provided:** 420 spaces	Yes
3.5.4 - Bicycle and Motorcycle Parking	C1: For all other new development with a gross floor area greater than 600m^2: 1 bicycle space per 600sqm GFA 1 motorcycle space per 15 car spaces	The potential future development provided in the indicative concept design can accommodate the bicycle and motorcycle parking requirements. This will be documented and addressed in the future detailed architectural drawings and associated DA.	Yes
	C6: Non-residential development shall provide end of trip facilities on-site as follows: a. 1 personal locker for each bike parking space b. 1 shower and change cubicle for every 10 bicycle spaces or part thereof c. 1 bicycle repair toolkit and pump d. Toilets, drying rooms, and hand washing facilities.	The indicative concept design provides appropriate space within the development to accommodate the required end of trip facilities in accordance with the DCP. This will be documented and addressed in the future detailed architectural drawings and associated DA.	Yes
3.5.6 - Loading Facilities *Table 5: Loading/Unloading Facilities*	Industrial: 8000 m² GFA and above 10 service bays (for MRV or larger); plus	The indicative concept design can provide loading facilities to meet the needs of the future warehouse or distribution centre development.	Yes

Reference	Provision	QF1 and QF2 Concept Designs	Complies
	1 service bay (for MRV or larger) / 1,000 m² GFA	This will be documented and addressed in the future detailed architectural drawings and associated DA.	
3.7.1 - Landscaping *Table 7: Minimum Landscaped Area*	C12: A minimum of 10% of the development site is to be landscaped.	The indicative concept design provides for 11.1% of the site as landscaping. This will be documented and addressed in the future detailed architectural drawings and associated DA.	Yes
3.11.1 - Contamination – General	C1: All sites must be evaluated to determine if the proposed development is on land suspected to have been used for a potentially contaminating activity or is potentially contaminated.	A PSI and DSI, accompanied by verification letters, have been provided as part of the Draft Planning Proposal. The previous site investigations confirm the site can be made suitable for future development of the site in accordance with the indicative concept designs and relevant environmental standards. Further detailed investigations and works will be undertaken at the DA stage. Further site investigation and appropriate remediation activities will be assessed as part of any future DA.	Yes
3.12 - Waste Minimisation and Site Facilities *3.12.5 All other development*	C1: Sufficient space must be provided to accommodate the storage of waste and recycling likely to be generated on the premises between collections and any associated equipment.	The indicative concept design provides appropriate space within the development to accommodate waste management in accordance with the DCP. This will be documented and addressed in the future detailed architectural drawings and associated DA.	Yes
3.13 - Development in areas subject to aircraft noise and affected by Sydney Airport's prescribed airspace	O1: To ensure development does not adversely affect air safety of Sydney Airport.	The Draft Planning Proposal is accompanied by an Acoustic Assessment prepared by Renzo Tonin which confirms typical commercial and industrial façade constructions are expected to achieve the required internal aircraft noise levels. The report specifies that land uses on the building facades or roof tenancy must be designed to achieve the required internal aircraft noise levels. This will be addressed in any future DA. The Aeronautical Impact Assessment confirms the future development can	Yes

Reference	Provision	QF1 and QF2 Concept Designs	Complies
		comply with the DCP and avoid any unacceptable impacts on Sydney Airport operations.	
6.4 - Industrial premises	C1: Industrial development is to comply with the following: a. site operations and equipment associated with a development are to be contained wholly within the site b. building design and site layout shall allow for an efficient and safe system for manoeuvring, loading and unloading, and parking of vehicles within the site	The indicative concept design provides appropriate space for all site operations and equipment to be wholly located within the site. It allows sufficient room for all required vehicle movements, including separation of heavy vehicle and passenger car movements. This will be documented and addressed in the future detailed architectural drawings and associated DA.	Yes
	C4: Local road networks within the LGA are not to be adversely affected as a result of the operations of an industrial or business use.	The Draft Planning Proposal is accompanied by a Transport Report which confirms the adjacent road network is able to accommodate the cumulative traffic generated by the QF1, QF2, QF2 and QF4 sites, subject to the Coward Street and Kent Street intersection modification as described in **Section 4.3.** This intersection upgrade will need to be assessed and addressed as part of any future DA. This report also confirms the proposed additional FSR and complementary land uses under Schedule 1 can be accommodated without adversely impacting on the local road network.	Yes
6.4 - Industrial premises *Site Planning and Setbacks*	C14: Front building setback: 9 metres Side building setback: 2 metres Rear building setback: nil to 3 metres	The indicative concept design has been prepared in accordance with the DCP setbacks and as listed below: ▪ Front building setback: 9 metres ▪ Rear building setback: 3 metres ▪ Side building setbacks: 3 metres (west) and 2 metres (east)	Yes

Reference	Provision	QF1 and QF2 Concept Designs	Complies
		This will be documented and addressed in the future detailed architectural drawings and associated DA.	
7.7 - Mascot West Employment Land	C2: Developments, including alterations and additions must improve the appearance of buildings, particularly along the roads which serve a gateway function to Sydney Airport and the Sydney CBD.	The indicative concept design provides for a high-quality development, including an activated frontage along Coward Street through the delivery of complementary uses under Schedule 1. The public art along the southern elevation of the building will provide a significant improvement to the existing appearance of the site and present a landmark entry statement for arrivals via Sydney Airport.	Yes
	C4: Development in land zoned for Industrial Purposes (between Coward Street and Qantas Drive) is to have a relationship with Sydney (Kingsford Smith) Airport.	The indicative concept design provides for additional warehouse or distribution centre floorspace which will support the growth of Sydney Airport, as well as Port Botany and the Sydney CBD. The potential future development as outlined within the indicative concept design provides for flexible tenancy arrangements to meet market demand which is expected to leverage the competitive advantages of the site and its proximity to Sydney Airport. As noted above, the public art to be delivered along the southern elevation of the future buildings will provide a unique opportunity to deliver a significant and meaningful artwork which recognises the continuing connection of Aboriginal people to their Country. This is particularly significant having regard to the location of the site close to Sydney Airport and the opportunity to deliver an important message to international and domestic arrivals to Sydney.	Yes

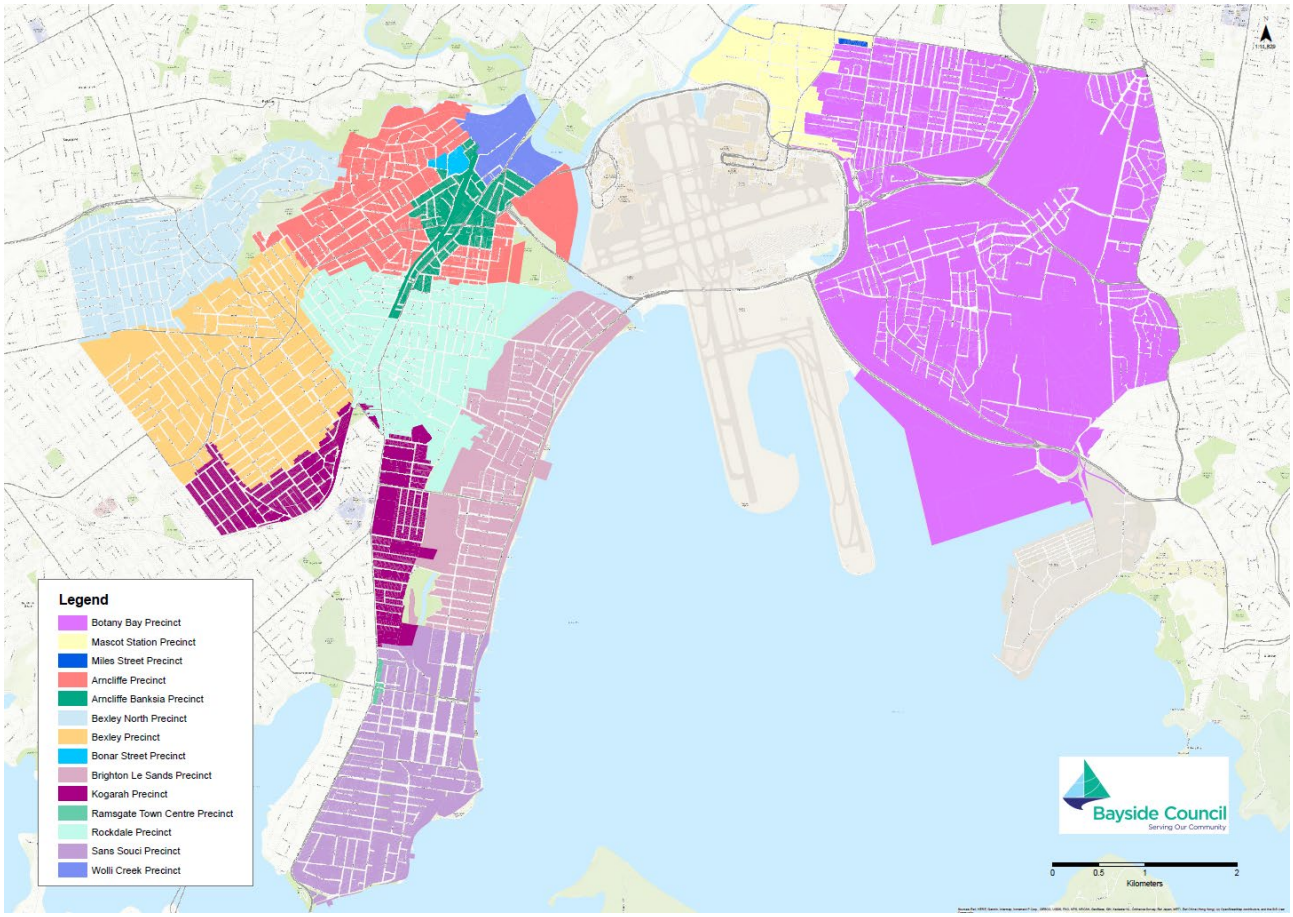
The preliminary assessment of the indicative concept design in accordance with BDCP 2022 demonstrates the proposed FSR of 2:1 and additional permitted uses to be listed in Schedule 1 can be accommodated in accordance with the current DCP controls which apply to the site.

Based on the above, a site-specific DCP is not warranted or required to be prepared to facilitate the proposed amendments as outlined within this Draft Planning Proposal.

5.3. Infrastructure Contributions

The site is located within the Mascot Station Precinct on the Development Contributions Precinct Map on the Bayside Council website[2] and as shown by the yellow shading in the figure below.

Figure 19 Development Contributions Precinct Map



Source: Bayside Council

The City of Botany Bay Section 94A Development Contributions Plan 2016 (Amendment 1, dated 26 October 2022) applies to the site. It applies a percentage levy of 1% on the estimated cost of development at the DA stage (indexed to the time of payment). The Draft Planning Proposal seeks to deliver additional industrial floorspace through an increase in the FSR control to a maximum of 2:1. This floorspace will generate further contributions at the DA stage through the increased estimated cost of the proposed development.

It is also proposed to explore the potential to deliver additional benefits by way of a Planning Agreement or similar process and in association with the future redevelopment of the site. These could include:

- The public artwork to be delivered on the southern façade will have significant value to the broader landscape, including international and domestic arrivals to Sydney Airport. The proposed artwork will be delivered at the DA stage in accordance with the Curatorial Vision Framework, with a monetary value of 1% of the estimated cost of the development.
- The proponent is proposing to engage in further discussions with Council to resolve whether additional transport facilities can be delivered in accordance with the redevelopment of the site. These could include delivery of bus shelters along Coward Street and Kent Road, introduction of a bicycle lane along the southern side of Coward Street, upgrades to existing footpaths adjoining the site boundaries or the dedication of the Kent Road cul-de-sac.

[2] https://www.bayside.nsw.gov.au/services/development-construction/planning-our-city/infrastructure-contributions, downloaded 4 May 2023

- The proponent is also investigating potential stormwater upgrades which would have benefits beyond the QF1 and QF2 sites. These could include opportunities to divert the existing stormwater system, including infrastructure upgrades and extinguishment of existing easement. These matters will also be explored in consultation with Council as part of the Draft Planning Proposal process (and for implementation at the DA stage).

6. Planning Proposal Assessment

The Draft Planning Proposal has been prepared in accordance with Section 3.33 of the EP&A Act and the DPE '*Local Environmental Plan Making Guideline'* dated September 2022.

This section addresses each of the matters to be addressed as outlined in the guidelines, including:

- Objectives and intended outcomes.
- Explanation of provisions.
- Justification of strategic and site-specific merit.
- Draft LEP maps.
- Community consultation.
- Project timeline.

Each of these matters has been informed by the technical deliverables lodged with the Draft Planning Proposal, including the indicative concept design and the detailed assessment reports.

6.1. Part 1: Objectives and Intended Outcomes

The **objectives** of the Planning Proposal are to amend the FSR control in BLEP 2021 to deliver critically needed industrial floor space close to the Sydney CBD and international trade gateways and provide for office, food-related uses and recreational uses which will enhance the appearance and amenity of the site.

The **intended outcomes** include:

- Support the growth of the Harbour CBD and the Eastern Economic Corridor through the provision of additional warehouse space which caters for the freight and logistics sector, including time sensitive and last mile distribution.
- Leverage the site's strategic location to support the international trade gateways, being Sydney Airport and Port Botany, including their current operations, capacity and future growth, and support the retention and optimisation of industrial zoned land within the Eastern City District.
- Incentivise the revitalisation of the site and contribute to addressing the critical shortage of industrial land and a lack of high-quality developments to meet current market demands and tenant requirements for modern supply chain and distribution facilities.
- Realise the development potential of the site, within the 44-metre maximum building height control while respecting aeronautical operations and the adjacent rail corridor.
- Provide direct economic investment into the locality and deliver a substantial number of employment opportunities through future redevelopment of the site during construction and operational phases.
- Enhance the ESG (environmental, social and governance) outcomes for the site through the replacement of out-dated warehouse facilities with modern well-designed buildings which meet market demand and incorporate sustainability measures to reduce energy and water consumption.
- Provide a range of land uses including active ground floor retail services that delivers amenity to the site, future workers, and the broader Mascot area.
- Deliver improvements to the existing streetscape and site appearance and infrastructure upgrades which benefit the site and locality.
- Capitalise on the infrastructure investment into major transport infrastructure upgrades, including the St Peters Interchange and the M8 Motorway (opened 2020) and future M4 and M5 Link Tunnels (opened early 2023).

The objectives and intended outcomes for the Draft Planning Proposal are aligned with the strategic planning policies identified in **Section 2.3** and discussed in further detail in **Section 6.3.1**.

6.2. Part 2: Explanation of Provisions

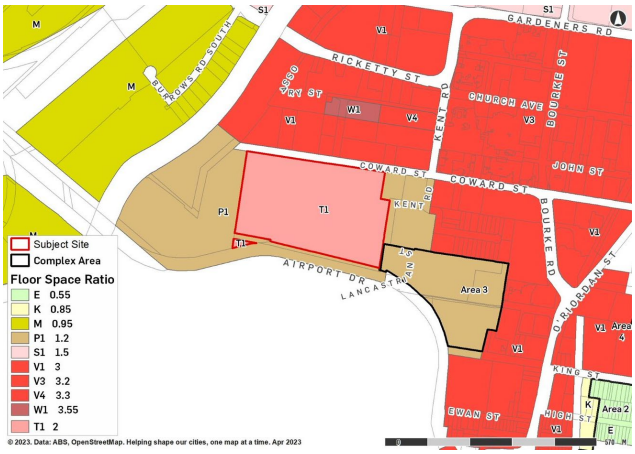
The objectives and intended outcomes of the Planning Proposal will be achieved by amending BLEP 2021 as follows:

- Amending the Floor Space Ratio Map to remove the site from Area 3 and provide a maximum floor space ratio control of 2:1.
- Removing the site (legal description) from clause 14(1) in Schedule 1 and the associated pink shading and '10' notation on the Additional Permitted Uses Map.
- Establishing a new site-specific clause under Schedule 1 and updating the Additional Permitted Uses Map to enable the following land uses to be permitted with development consent on the site:
  - Office Premises
  - Café or Restaurant
  - Recreation Facility (Indoor)
  - Recreation Facility (Outdoor)

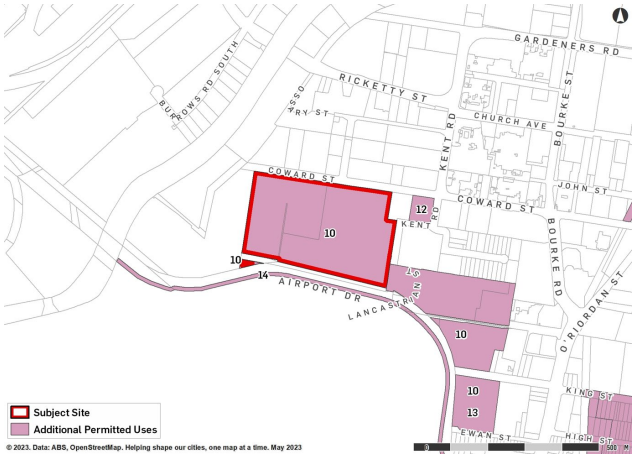
Thumbnail maps showing the intended provisions and associated amendments to the FSR and Additional Permitted Uses Maps in BLEP 2021 are provided in **Figure 20**, with larger scale maps provided at |**Appendix R**.

Figure 20 LEP Mapping Amendments

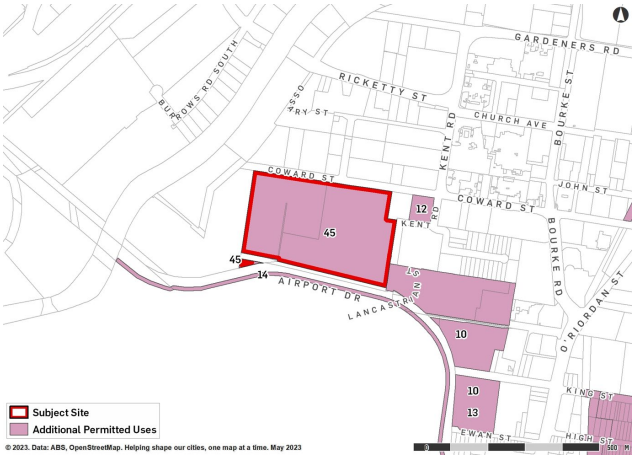
Existing FSR Map



Proposed FSR Map



Existing Additional Permitted Uses Map



Proposed Additional Permitted Uses Map

Source: Urbis, 2023

The proposed changes to the wording of clause 14(1) in Schedule 1 and wording for the new clause to be inserted in Schedule 1 are provided below.

Updated Clause 14(1)

14 Use of certain land at Coward Street, King Street and Kent Road, Mascot

*(1) This clause applies to land at Coward Street, King Street and Kent Road, Mascot, being Lots 2 and 4, DP 234489, Lot B, DP 164829, **~~Lot 1, DP 81210~~**, **~~Lot 1, DP 202093~~**, Lot 1, DP 721562, Lot 1, DP 202747, Lot 133, DP 659434, **~~Lots 4 and 5, DP 38594~~**, **~~Lots 1 and 2, DP 738342~~**, **~~Lot 23, DP 883548~~**, **~~Lot 3, DP 230355,~~** **~~Lot 4, DP 537339~~**, **~~Lot 1, DP 445957~~** and Lot 2, DP 510447 and identified as "10" on the Additional Permitted Uses Map.*

New Clause 45

45 Use of certain land at 263-273 and 273A Coward Street and 76-82 Kent Road, Mascot

(1) This clause applies to land at 263-273 and 273A Coward Street and 76-82 Kent Road, Mascot, being Lots 100 and 101 in DP 1277278, Lot 5 in DP 1194564 and Lot 3 in DP 230355, and identified as "45" on the Additional Permitted Uses Map.

(2) Development for the following purposes is permitted with development consent:

(a) office premises

(b) café or restaurant

(c) recreation facility (indoor)

(d) recreation facility (outdoor)

The proposed uplift in FSR to 2:1 would increase the permitted GFA from 113,478.72m^2 to 189,131m^2. This will enable an additional 75,652m^2 GFA to be delivered in the future redevelopment of the site, optimising its potential and supporting the growth of the Sydney CBD and international trade gateways (ie Sydney Airport and Port Botany).

The proposed updates to clause 14 in Schedule 1 would 'de-link' the site from the provisions which were originally proposed by Qantas in accordance with their operations and provide a clear and concise approach to calculating the maximum floorspace which is permitted on the site.

The new clause in Schedule 1 will facilitate a planning approvals pathway for complementary land use activities which would not otherwise be permitted on land within the E4 General Industrial zone. These additional permitted uses will enhance the attractiveness of the site for future tenants while maintaining the integrity and primary significance of industrial and warehouse development on the site.

6.3. Part 3: Justification of Strategic and Site-Specific Merit

6.3.1. Section A – Need for the Planning Proposal

Q1. Is the planning proposal a result of an endorsed local strategic planning statement, strategic study or report?

To be confirmed - the Planning Proposal is not directly linked to a local planning priority or action in the LSPS, noting the final priorities and actions will be resolved through the completion of additional tasks, including finalising and adopting the Bayside Centres and Employment Lands Strategy.

Once this Strategy has been adopted and publicly released, it will become clear as to whether the Draft Planning Proposal will give effect to any of the final actions associated with the Strategy and the LSPS. In the meantime, it can be confirmed the Draft Planning Proposal will give effect to the Greater Sydney Region Plan and Eastern City District as outlined in detail in **Section 6.3.2**.

The Region and District Plans formed the basis for the preparation of the LSPS and it is likely these will influence the final actions within the Bayside Centres and Employment Lands Strategy, including initiatives to retain and protect industrial zoned land within the Eastern City District.

Q2. Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

Yes - the proposed amendments provide a clear and concise approach to delivering additional industrial/warehouse floorspace to support the Sydney CBD, Sydney Airport and Port Botany. The proposed update to the existing FSR Map and removal of the site from the existing Schedule 1 provisions will enable an additional 75,652m^2 GFA to be delivered in the future redevelopment of the site.

It is highly unlikely the extent of additional floorspace proposed via the Draft Planning Proposal could be achieved through a Clause 4.6 variation as part of a Development Application due to the extent of variation and compliance with the 'Part 5 test' established by the Land and Environment Court.

The Draft Planning Proposal could have been prepared and lodged after Bayside Council finalised and adopted the Bayside Centres and Employment Lands Strategy. However, this could result in a significant delay to the future redevelopment of the site, noting the time involved in the plan making and development assessment processes. The leaseback over the QF2 site is limited to 2-3 years and accordingly, it was considered imperative to advance the Draft Planning Proposal in close consultation with Bayside Council, State government authorities and agencies, utility service providers and other key stakeholders.

Based on the above, it has been demonstrated that the Draft Planning Proposal as outlined within this report is the best, most efficient and most time-effective approach to realising the objectives and intended outcomes as described within **Section 6.1**.

6.3.2. Section B – Relationship to Strategic Planning Framework

Q3. Will the planning proposal give effect to the objectives and actions of the applicable regional, district plan or strategy (including any exhibited draft plans or strategies)?

Yes - the Planning Proposal will give effect to the objectives and actions of the applicable relevant objectives, priorities and actions in the Greater Sydney Region Plan and the Eastern City District Plan as outlined in detail below.

Greater Sydney Region Plan: A Metropolis of Three Cities – Connecting People

The Greater Sydney Region Plan provides the overarching strategic plan for growth and change in Sydney. It is a 20-year plan with a 40-year vision that seeks to transform Greater Sydney into a Metropolis of Three Cities – the Western Parkland City, Central River City and Eastern Harbour City.

It identifies key challenges facing Sydney including increasing the population to eight million by 2056, 817,000 new jobs and a requirement of 725,000 new homes by 2036. The Plan includes objectives and strategies for infrastructure and collaboration, liveability, productivity and sustainability.

The Draft Planning Proposal is consistent with the relevant objectives of Region Plan, as discussed in detail within the following table.

Table 9 Consistency with Greater Sydney Region Plan

Objectives	Consistency
Direction 1: A city supported by infrastructure	
Objective 4: Infrastructure use is optimised	The site benefits from significant upgrades to road transport infrastructure through the WestConnex project, including the St Peters Interchange and the M8 Motorway (opened 2020). The M4 and M5 Link Tunnels will provide improved connections to the broader network, including the Rozelle Interchange to the north and the Sydney Gateway to the south.

Objectives	Consistency
	The plan amendments seek to leverage this significant government investment and deliver additional floor space capacity in an appropriate and accessible location.
Direction 6: A well-connected city	
Objective 15: The Eastern, GPOP and Western Economic Corridors are better connected and more competitive	The site is adjacent to Sydney Airport and strategically located close to Port Botany, each of which are identified as major assets and trade gateways within the Eastern Economic Corridor. The proposed plan amendment seeks to deliver additional floorspace and create increased job opportunities within walking distance of Mascot railway station.
Objective 16: Freight and logistics network is competitive and efficient	The Greater Sydney Region Plan states that both Sydney Airport and Port Botany are identified as nationally significant trade gateways with significant projected growth by 2056. The proposed plan amendment will contribute to meeting anticipated demand for additional warehouse or distribution centre floor space within the locality. The maximum height controls are not proposed to be amended as part of the proposal. However, it is acknowledged consultation will be required with Sydney Airport as part of any future development application to avoid any impacts on the existing and future airport operations, including ongoing protection of the prescribed airspace.
Direction 7: Jobs and skills for the city	
Objective 23: Industrial and urban services land is planned, retained and managed	The proposal does not seek any change to the existing E4 General Industrial zoning. The proposed amendment to increase the current maximum FSR control would facilitate the retention and optimal use of existing industrial land within the Eastern Harbour City. It would also support the growing demand for additional industrial floor space close to Sydney Airport, Port Botany and the Sydney CBD and time sensitive and last mile distribution across the Eastern, South-Eastern and Northern Suburbs of Sydney.

Overall, it is considered the Draft Planning Proposal is entirely aligned and consistent with the Greater Sydney Region Plan and will contribute to the delivery of its objectives.

Our Greater Sydney 2056: Eastern City District Plan

The Eastern City District Plan is a 20-year plan to manage growth in the context of economic, social and environmental matters to implement the objectives of the Greater Sydney Region Plan. The intent of the District Plan is to inform local strategic planning statements and local environmental plans, guiding the planning and support for growth and change across the district.

The District Plan contains strategic directions, planning priorities and actions that seek to implement the objectives and strategies within the Region Plan at the district-level. The Structure Plan identifies the key centres, economic and employment locations, land release and urban renewal areas and existing and future transport infrastructure to deliver growth aspirations.

The planning priorities and actions likely to have implications for the proposed development are listed and discussed below. The proponent responses are generally similar to those provided within the review of the Greater Sydney Region Plan, including optimisation of the existing industrial land to support the ongoing growth and forecast demand generated by the international trade gateways.

Table 10 Consistency with Eastern City District Plan

Planning Priorities	Consistency
Infrastructure and Collaboration	
Planning Priority E1: Planning for a city supported by infrastructure	The site is well-located to optimise recent major investments and upgrades in road transport infrastructure which enhance the connectivity of the site and its associated competitive advantages, including the St Peters Interchange, M8 Motorway and the future M4 and M5 Link Tunnels. The proposed FSR uplift will leverage the competitive advantage of the site and its high level of connectivity and accessibility to the road network and public transport.
Productivity	
Planning Priority E7: Growing a stronger and more competitive Harbour CBD	The proposed increase in FSR will accommodate additional industrial zoned floor space to support the Harbour CBD and the Western Economic Corridor. The site is well located and accessible to attract and retain employees, driving continued innovation and employment growth in the freight and logistics sector.
Planning Priority E9: Growing international trade gateways	The site is strategically located adjacent to Sydney Airport and close to Port Botany which are both identified as international trade gateways. The renewal of the existing industrial zoned land will optimise the competitive advantages and efficiencies of the proximity to these gateways and deliver additional floor to support their growth, capacity and growth, as well as associated supply chain industries.
Planning Priority E12: Retaining and managing industrial and urban services land	The proposed plan amendment seeks to deliver additional industrial floor space capacity to accommodate the strong demand within the locality. It will support the retention and management of industrial areas within the Eastern City District and generate additional employment opportunities within an accessible location.

Overall, the proposed FSR uplift is considered entirely consistent with the planning priorities outlined within the District Plan and will contribute to the delivery of the identified actions to achieve its desired outcomes.

Assessment Criteria for Strategic and Site-Specific Merit

The following section outlines the way in which the Draft Planning Proposal complies with the strategic merit considerations outlined in the LEP Guideline.

Does the proposal:

- *Give effect to the relevant regional plan outside of the Greater Sydney Region, the relevant district plan within the Greater Sydney Region, and/or corridor/precinct plans applying to the site. This includes any draft regional, district or corridor/precinct plans released for public comment or a place strategy for a strategic precinct including any draft place strategy?*

Yes - the Draft Planning Proposal will give effect to the Greater Sydney Region Plan and the Eastern City District Plan as outlined in detail in **Table 9** and **Table 10** above.

- *Demonstrate consistency with the relevant LSPS or strategy that has been endorsed by the Department or required as part of a regional or district plan?*

  Yes - the Draft Planning Proposal is entirely consistent with Future Bayside: Local Strategic Planning Statement as outlined in **Table 11** below.

- *Respond to a change in circumstances that has not been recognised by the existing planning framework?*

  N/A - the Draft Planning Proposal does not rely upon a change in circumstances that has not been recognised by the existing strategic planning framework as identified above. It has been demonstrated the Draft Planning Proposal is consistent with the Greater Sydney Region Plan, the Eastern City District Plan and the Bayside LSPS.

The site-specific merit of the Planning Proposal is discussed in detail in **Section 6.3.3** of this report, including a comprehensive assessment of the impacts of the proposal on the natural and built environments, the compatibility of the future development with the locality and the services and infrastructure required to accommodate the additional industrial floorspace and complementary land use activities.

Q4. Is the planning proposal consistent with a Council LSPS that has been endorsed by the Planning Secretary or GSC, or another endorsed local strategy or strategic plan?

Yes - the Draft Planning Proposal is consistent with the provisions of '*Future Bayside: Local Strategic Planning Statement – A land-use vision to 2036*' which provides the framework and vision for land use planning over a 20-year period in the Bayside LGA.

The LSPS acts as a unifying document, implementing actions in the Region and District Plans and Council's priorities in the Community Strategic Plan prepared under the *Local Government Act 1993*. The four defining themes of the LSPS are:

- Theme 1: Bayside will be vibrant place
- Theme 2: Our people will be in a connected Smart City
- Theme 3: Bayside will be green, leafy and sustainable
- Theme 4: We will be a prosperous community.

The planning priorities and actions likely to have implications for the proposed development are identified in **Table 11** below.

Table 11 Consistency with Future Bayside LSPS

Planning Priorities	Consistency
A City Supported by Infrastructure	
Bayside Planning Priority 1: Align land use planning and transport infrastructure planning to support the growth of Bayside	The site benefits from significant upgrades to road infrastructure, including WestConnex and the Sydney Gateway. The proposed plan amendment seeks to leverage this significant government investment and deliver additional floor space capacity in an appropriate and accessible location that will support the growth of Bayside.
A collaborative city	
Bayside Planning Priority 3: Working through collaboration	The project team has undertaken consultation with a range of stakeholders including Council, TfNSW, ARTC, SACL and State and Federal Parliament members.

Planning Priorities	Consistency
	Bayside Council also consulted with external and internal stakeholders in preparing the Scoping Proposal advice, including TfNSW, EPA, DPE (Hazards Branch), Jemena, Sydney Water and SACL. Internal referral responses were received from Council's Urban Designer, Engineer and Strategic Floodplain Engineer. All feedback from the stakeholder consultation processes has been incorporated into the Draft Planning Proposal and detailed technical deliverables as summarised in **Section 3.2** and **Section 3.3**.
A well connected city	
Bayside Planning Priority 12: Delivering an integrated land use and a 30-minute city	The proposed plan amendment seeks to deliver additional industrial floor space capacity in an area of the Bayside LGA that is well connected with road and rail infrastructure and close to suitably qualified and creative talents. This will support aspirations for a 30-minute city with additional jobs being delivered in an accessible location, close to Mascot Station and existing bus services.
Jobs and skills for the city	
Bayside Planning Priority 13: Contribute to growing a stronger and more competitive Harbour CBD	The proposed 2:1 FSR will accommodate additional industrial zoned floor space to support the Harbour CBD and Eastern Economic Corridor. This will assist with driving the revitalisation of out-dated industrial facilities and provision of modern well-designed buildings which meet current operational requirements, particularly for time sensitive and last mile distribution activities. The site is well located and accessible to attract and retain employees, driving continued innovation and employment growth in the freight and logistics sector.
Bayside Planning Priority 14: Protect and grow the international trade gateways	The site is strategically located adjacent to Sydney Airport and close to Port Botany which are both international trade gateways. The proposal will enable additional floor space for warehouse and distribution centres that will assist in the ongoing operations, capacity and growth of these important assets within the Bayside LGA.
Planning Priority 15: Growing investment, business opportunities and jobs in Bayside's strategic centres and centres	Mascot-Green Square is identified as a key strategic centre which is forecast to grow to between 75,000-80,000 jobs by 2036. The proposed plan amendment will support the delivery of additional jobs growth within the strategic centre, consistent with the LSPS actions to retain and manage surrounding employment, industrial and urban services land and their role in supporting the Harbour CBD and Bayside.
Bayside Planning Priority 17: Retain and manage industrial and urban services lands	The Draft Planning Proposal does not seek any changes to the E4 General Industrial zone provisions. The proposed FSR uplift will facilitate the delivery of additional industrial floor space to support the retention and management of industrial zoned land within the Bayside LGA. It will optimise the

Planning Priorities	Consistency
	potential of the site and generate additional jobs during both its construction and operational phases. The proposed amendments to the FSR control and Schedule 1 will provide for a clear and concise approach to the delivery of future development. The complementary land use activities proposed along the Coward Street frontage will activate and enliven the streetscape and provide amenity for workers within the warehouse development and surrounding industrial zone. The additional uses are limited in scale and will not impact on the integrity of the E4 zone or the retention and management of industrial land.
Bayside Planning Priority 18: Support the growth of targeted industry sectors	The proposed increase in FSR will facilitate the revitalisation of the site by providing an appropriate financial incentive to demolish the out-dated facilities and deliver additional industrial zoned floor space to support technological advancements in the manufacturing, freight and logistics sector. With the growth of e-commerce, time sensitive and last mile delivery services, the site is strategically located to cater for these growth industries across eastern, south-eastern and northern suburbs of Sydney.
A city in its landscape	
Bayside Planning Priority 20: Increase urban tree canopy coverage and enhance green grid connections	The future development will seek to retain and protect the existing significant trees along the northern and southern boundaries and supplement with additional tree planting and landscaping to improve the amenity of the site and increase the existing urban tree canopy coverage. This will be documented in the landscape drawings and DA for the future development of the site.
An efficient city	
Bayside Planning Priority 23: Reduce carbon emissions through improved management of energy, water and waste	An ESD report has been prepared by E-Lab Consulting (**Appendix S**), which accompanies the Draft Planning Proposal. It provides ESD strategies and commitments which will be implemented at the DA stage to deliver an affordable and sustainable outcome for the project during the design, construction and operational phases. The proposed sustainability elements are consistent with the feedback provided by the State Design Review Panel for the QF3 SSDA which has been subject to a rigorous review process with a strong focus on sustainability measures. The strategies and initiatives will be reviewed and refined at the DA stage to provide the optimal outcome for the future development and realise the objectives of the LSPS priorities.
A resilient city	
Bayside Planning Priority 24: Reduce community risk to urban and natural hazards and improve	A Flood Assessment has been undertaken as part of the Civil Engineering Report prepared by Costin Roe at **Appendix J** to assess the effect of flooding of the site deriving from future

Planning Priorities	Consistency
the community's resilience to social, environmental and economic shocks and stressors	development. The modelling and assessment in the Flood Assessment confirms there is negligible impact on upstream, downstream and/ or adjoining sites as a result of the proposed developments.

The Draft Planning Proposal is considered entirely consistent with the local planning priorities. It provides for the protection and management of industrial land to drive significant investment in the Bayside LGA. The proposed additional floorspace and complementary land use activities will deliver additional local jobs and support the ongoing operations and growth of the international trade gateways.

Bayside 2032: Community Strategic Plan

Consideration has also been given to Bayside 2032 which is the current version of the Bayside Community Strategic Plan (**CSP**) as adopted by Council on 11 May 2022. It provides the vision and goals for the future of Bayside over the next 10 years and up to 2032. The four key themes that underpin the CSP are:

- Theme 1: In 2032, Bayside will be a vibrant place
- Theme 2: In 2032, our people will be connected in a creative City
- Theme 3: In 2032, Bayside will be green, resilient and sustainable
- Theme 4: In 2032, Bayside will be a prosperous community.

The community outcomes and strategics likely to have implications for the proposed development are noted in the **Table 9** below.

Table 12 Consistency with Bayside CSP

Community Outcomes	Consistency
Community Outcome 4.1: Bayside generates diverse local employment and business opportunities	The proposed plan amendment will facilitate the renewal and redevelopment of the site by delivering additional industrial floor space capacity. This will generate additional economic investment and local employment opportunities during both the construction and operational phases of the staged redevelopment.
Community Outcome 4.2: Bayside recognises and leverages opportunities for economic development	The proposal will optimise the development potential of zoned industrial land in a key strategic location which benefits from recent State investment in transport infrastructure. The additional floor space capacity will help support the operations, capacity and growth of the key trade gateways, including both Port Botany and Sydney Airport. It will deliver a significant economic investment of approximately $2 billion, with direct and indirect economic benefits for the broader local economy, including increased local jobs.

Overall, it is considered Is the Draft Planning Proposal is consistent with the Bayside LSPS and the Bayside Community Strategic Plan in accordance with the LEP Guideline.

Q5. Is the planning proposal consistent with applicable State and regional studies or strategies?

Yes - the Planning Proposal the proposal is consistent with *Future Transport Strategy 2056* which sets the State-wide outcomes to guide investment, services and policy and framework for network planning and investment aimed at supporting transport infrastructure.

The site is well-serviced by existing road infrastructure, with excellent connections to the Sydney metropolitan road network, including multiple motorways and upgrades via the WestConnex and Sydney Gateway projects. These road connections are highly beneficial for warehouse and logistics operations as they provide efficient access across Greater Sydney and Regional NSW. The proposed uplift in FSR will deliver critically needed industrial floorspace, leveraging recent transport investment and providing for significant investment and employment generation.

The site is also strategically located adjacent to Sydney Airport and close to Port Botany which are both identified as international trade gateways. The additional industrial floor space will optimise the competitive advantages and efficiencies of the proximity to these gateways contributing to efficient freight connectivity and access. The site is well placed within proximity to public transport services including Mascot Station and local bus services, aligning with the strategic direction to support growth around public transport.

Q6. Is the planning proposal consistent with applicable State Environmental Planning Policies?

Yes - the Planning Proposal is consistent with relevant State Environmental Planning Policies (**SEPP**) as identified and discussed in the following table.

Table 13 Consistency with SEPPs

Relevant Document	Consistency
SEPP (Biodiversity and Conservation) 2021	*State Environmental Planning Policy (Biodiversity and Conservation) 2021* relates to biodiversity and conservation planning matters. As the site is located within an established industrial precinct, this SEPP is not relevant to the planning proposal request. There are significant trees across the site, primarily within the landscaped setbacks along the northern and southern boundaries of the site. Future development will seek to retain and protect the existing significant trees along the northern and southern boundaries and supplement with additional tree planting and landscaping to increase the existing urban tree canopy coverage. The Arborist Report (**Appendix K**) details the health and condition of site trees and those on adjoining properties and how they may pose a constraint to any potential development on the site. The Arborist Report allocates a significance rating and retention value to the site trees. The findings of the report will be refined and applied to the design process associated with any future development application. Any future development application will have regard to Part 2.2 of the SEPP.
SEPP (Resilience and Hazards) 2021	*State Environmental Planning Policy (Resilience and Hazards) 2021* (**Resilience and Hazards SEPP 2021**) provides the planning framework for the management of contaminated land in NSW. The site is zoned E4 General Industrial and is in an established industrial precinct. Clause 4.6 of the Resilience and Hazards SEPP 2021 states that a consent authority must not consent to development unless it has considered whether the land is contaminated and if required, it is satisfied that the land will be remediated before the land us used for that purpose. Previous investigations were undertaken regarding the site to assist with the divestment of the site by Qantas, including a PSI prepared by Reditus and a DSI prepared by ERM. Verification letters were sought from Reditus

Relevant Document	Consistency
	and ERM to confirm the validity of their findings in accordance with current legislation. The investigations confirm the site is impacted by historic activities, with identified soil contaminants and asbestos. The DSI concludes that due to the industrial nature of the site and surrounding area, the environmental quality of soil and groundwater does not preclude the site for continued commercial/industrial use subject to appropriate management of identified impacts which will be implemented at the DA stage. The findings of the DSI and recommended mitigation are further discussed in **Section 6.3.3** of this report.
SEPP (Sustainable Buildings) 2022	*State Environmental Planning Policy (Sustainable Buildings) 2022* encourages the design and delivery of more sustainable buildings. It sets sustainability standards for residential and non-residential development and starts the process of measuring and reporting on the embodied emissions of construction materials. Chapter 3 of the SEPP outlines the standards for non-residential development to minimise waste and energy consumption. An ESD report has been prepared by E-Lab Consulting (**Appendix S**) which accompanies the Draft Planning Proposal. It provides ESD strategies and commitments which will be implemented at the DA stage to deliver an affordable and sustainable outcome for the project during the design, construction and operational phases.
SEPP (Transport and Infrastructure) 2021	*State Environmental Planning Policy (Transport and Infrastructure) 2021* provides a consistent planning regime for infrastructure and the provision of services across NSW, along with providing for consultation with relevant public authorities during the assessment process. Whilst this Planning Proposal does not seek development consent for building works, any future DA will need to be assessed in accordance with the following clauses: ▪ Clause 2.77 Development adjacent to pipeline corridors ▪ Clause 2.98 Development adjacent to rail corridors ▪ Clause 2.122 Traffic-generating development A Pipeline Risk Assessment was prepared by Riskcon (**Appendix P**) in association with the Draft Planning Proposal to establish whether the proposed increase in FSR could be accommodated without resulting in additional safety risks or concerns associated with the high-pressure goods and gas pipeline within the locality. The report confirms there would be no impacts associated with the Draft Planning Proposal. However, consultation with Jemena will be required at the DA stage and prior to any works outside the site boundaries (if required). The proposed future buildings as shown in the indicative concept design are well setback from the southern boundary, with increased distances compared to the minimum DCP requirements. Further consultation may be

Relevant Document	Consistency
	required with the relevant rail authorities at the DA stage, depending on the final detailed design. The Transport Report confirms the cumulative impacts of the proposed development on the consolidated land holding, including the likely future development on the QF1 and QF2 land will operate at satisfactory or better levels of service in the weekday morning and afternoon peak periods. This will be assessed in further detail at the DA stage and having regard to the final land use mix and GFA.

Q7 Is the planning proposal consistent with applicable Ministerial Directions (s.9.1 directions)?

Yes - The Planning Proposal is consistent with relevant Ministerial directions under section 9.1 of the EP&A Act as identified and summarised in the following table.

Table 14 Consistency with Section 9.1 Directions

Direction	Assessment	Consistency
1. Planning Systems		
1.1 Implementation of Regional Plans	The Draft Planning Proposal will give effect to the Greater Sydney Region Plan and the Eastern City District Plan. It is consistent with the planning principles, directions and priorities contained in the Region Plan as outlined in **Section 6.3.2.**	Yes
1.2 Development of Aboriginal Land Council Land	Not applicable to this Planning Proposal	N/A
1.3 Approval and Referral Requirements	Not applicable to this Planning Proposal	N/A
1.4 Site Specific Provisions	The Draft Planning Proposal seeks to simplify the existing local planning controls by amending the FSR Map to provide for a maximum FSR of 2:1 and removing the site from the current Schedule 1 provisions in clause 14 which is entirely consistent with this direction. It also seeks to provide for a limited range of complementary land use activities by listing the specified land use definitions in Schedule 1. This approach is also consistent with the provisions of the direction as it is clear and concise and will not undermine the integrity of the E4 zone. Draft clauses and maps have been prepared to clearly identify the site and the proposed plan amendments.	Yes

Direction	Assessment	Consistency
1.5 Parramatta Road Corridor Urban Transformation Strategy	Not applicable to this Planning Proposal.	N/A
1.6 Implementation of North West Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	Not applicable to this Planning Proposal.	N/A
1.7 Implementation of Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	Not applicable to this Planning Proposal.	N/A
1.9 Implementation of Glenfield to Macarthur Urban Renewal Corridor	Not applicable to this Planning Proposal.	N/A
1.10 Implementation of the Western Sydney Aerotropolis Plan	Not applicable to this Planning Proposal.	N/A
1.11 Implementation of Bayside West Precincts 2036 Plan	Not applicable to this Planning Proposal.	N/A
1.12 Implementation of Planning Principles for the Cooks Cove Precinct	Not applicable to this Planning Proposal.	N/A
1.13 Implementation of St Leonards and Crows Nest 2036 Plan	Not applicable to this Planning Proposal.	N/A
1.14 Implementation of Greater Macarthur 2040	Not applicable to this Planning Proposal.	N/A
1.15 Implementation of the Pyrmont Peninsula Place Strategy	Not applicable to this Planning Proposal.	N/A
1.16 North West Rail Link Corridor Strategy	Not applicable to this Planning Proposal.	N/A
1.17 Implementation of the Bays West Place Strategy	Not applicable to this Planning Proposal.	N/A

Direction	Assessment	Consistency
1.18 Implementation of the Macquarie Park Innovation Precinct	Not applicable to this Planning Proposal.	N/A
1.19 Implementation of the Westmead Place Strategy	Not applicable to this Planning Proposal.	N/A
1.20 Implementation of the Camellia-Rosehill Place Strategy	Not applicable to this Planning Proposal.	N/A
1.21 Implementation of South West Growth Area Structure Plan	Not applicable to this Planning Proposal.	N/A
1.22 Implementation of the Cherrybrook Station Place Strategy	Not applicable to this Planning Proposal.	N/A
2. Design and Place <this Focus Area was blank when the directions were made>		
3. Biodiversity and Conservation		
3.1 Conservation Zones	Not applicable to this Planning Proposal.	N/A
3.2 Heritage Conservation	The site has no identified or known items of European or Aboriginal significance. However, it is close to other listed items including: ▪ Local Heritage Item I298: Commonwealth Water Pumping Station and Sewage Pumping Station No 38 located south of the site. ▪ Local Heritage Item I382: Ruins of the former Botany Pumping Station located south of the site. ▪ Local Heritage Item I383: Sydney (Kingsford Smith) Airport group located south of the site. ▪ State Heritage Item I260: Alexandra Canal (including sandstone embankment) located west of the site. A HIS has been prepared by Urbis which confirms the Draft Planning Proposal will not have any impact on the significance of the above items. It concludes the proposal will facilitate future development that will complement and enhance the aviation character of the immediate area in relation to the Sydney Airport heritage item. The Planning Proposal will have no immediate or future impact on the state-listed Alexandra Canal in the vicinity.	Yes

Direction	Assessment	Consistency
3.3 Sydney Drinking Water Catchments	Not applicable to this Planning Proposal.	N/A
3.4 Application of C2 and C3 Zones and Environmental Overlays in Far North Coast LEPs	Not applicable to this Planning Proposal.	N/A
3.5 Recreation Vehicle Areas	Not applicable to this Planning Proposal.	N/A
3.6 Strategic Conservation Planning	Not applicable to this Planning Proposal.	N/A
3.7 Public Bushland	The Arborist Report (**Appendix K**) includes a preliminary assessment of the trees on the site and adjoining properties regarding their impacts on the potential future development of the site in accordance with the Draft Planning Proposal. The existing trees are primarily within the landscaped setbacks along the northern and southern boundaries of the site. An Arboricultural Impact Assessment will be submitted with any future DA based on the detailed design and potential impacts to tree population. The indicative concept design demonstrates the proposed 2:1 FSR can be accommodated in accordance with the siting and design controls in the BDCP 2022, including the landscape area provisions, to facilitate the retention of existing trees and deliver supplementary planting.	Yes
3.8 Willandra Lakes Region	Not applicable to this Planning Proposal.	N/A
3.9 Sydney Harbour Foreshores and Waterways Area	Not applicable to this Planning Proposal.	N/A
3.10 Water Catchment Protection	Not applicable to this Planning Proposal.	N/A
4. Resilience and Hazards		
4.1 Flooding	A Flood Impact Assessment has been provided at **Appendix J** which details the flood requirements as per Council's Flood Management Policy and the NSW Floodplain Development Manual. Flood mitigation measures have been incorporated into the concept designs as per the requirements and detailed in **Section 6.3.3** of this report.	Yes

Direction	Assessment	Consistency
4.2 Coastal Management	Not applicable to this Planning Proposal.	N/A
4.3 Planning for Bushfire Protection	Not applicable to this Planning Proposal.	N/A
4.4 Remediation of Contaminated Land	The Planning Proposal does not seek to change the E4 General Industrial zone. The technical deliverables provided with the Draft Planning Proposal, including the original investigations and verification letters, demonstrate the site is suitable for its intended use.	Yes
4.5 Acid Sulfate Soils	The site is categorised as Soil Class 2 Acid Sulfate Soils (**ASS**). An ASSMP will prepared as part of any future DA.	Yes
4.6 Mine Subsidence and Unstable Land	Not applicable to this Planning Proposal.	N/A
5. Transport and Infrastructure		
5.1 Integrating Land Use and Transport	The Planning Proposal is consistent with the direction for the following reasons: ▪ The site benefits from access to public transport, including Mascot Train Station and local bus services. ▪ The Draft Planning Proposal supports the 30-minute city with jobs being delivered in an accessible location. ▪ The additional industrial floorspace and complementary land use activities will provide for increased employment opportunities within the Bayside LGA.	Yes
5.2 Reserving Land for Public Purposes	Not applicable to this Planning Proposal.	N/A
5.3 Development Near Regulated Airports and Defence Airfields	Sydney Airport is south of Qantas Drive. The proponent has previously engaged with representatives from Sydney Airport to discuss the Draft Planning Proposal and will continue to engage with SACL as this matter is progressed. The Aeronautical Impact Assessment does not identify any significant impacts from future development of the site in accordance with the Draft Planning Proposal which would affect the safe operation of Sydney Airport. The future buildings will not infringe the Obstacle Limitation Surfaces and the future uses are acceptable within Australian Noise Exposure Forecast (**ANEF**) zones. The Assessment recommends further assessment and consultation be undertaken at the DA stage, including the	Yes

Direction	Assessment	Consistency
	proposed lighting and use of temporary craneage during construction.	
5.4 Shooting Ranges	Not applicable to this Planning Proposal.	N/A
6. Housing		
6.1 Residential Zones	Not applicable to this Planning Proposal.	N/A
6.2 Caravan Parks and Manufactured Home Estates	Not applicable to this Planning Proposal.	N/A
7. Industry and Employment		
7.1 Business and Industrial Zones	The Draft Planning Proposal does not seek to change the E4 General Industrial zone provisions. The proposed amendment to increase the current maximum FSR will facilitate the retention and optimal use of existing industrial land within the Eastern Harbour City and support the growing demand for additional industrial floor space close to Sydney Airport, Port Botany and the Sydney CBD. The complementary land use activities proposed via the new clause to be inserted in Schedule 1 is provided to attract high-quality warehouse tenants by delivering on-site amenity for workers and visitors, without compromising the core purpose of the industrial land use zone	Yes
7.2 Reduction in non-hosted short-term rental accommodation period	Not applicable to this Planning Proposal.	N/A
7.3 Commercial and Retail Development along the Pacific Highway, North Coast	Not applicable to this Planning Proposal.	N/A
8. Resources and Energy		
8.1 Mining, Petroleum Production and Extractive Industries	Not applicable to this Planning Proposal.	N/A
9. Primary Production		
9.1 Rural Zones	Not applicable to this Planning Proposal.	N/A
9.2 Rural Lands	Not applicable to this Planning Proposal.	N/A

Direction	Assessment	Consistency
9.3 Oyster Aquaculture	Not applicable to this Planning Proposal.	N/A
9.4 Farmland of State and Regional Significance on the NSW Far North Coast	Not applicable to this Planning Proposal.	N/A

6.3.3. Section C – Environmental, Social and Economic Impact

Q8. Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

No - the Planning Proposal is highly unlikely to adversely affect any critical habitat or threatened species, populations or ecological communities or their habitats. The proposal is located within Mascot, which is already significantly developed and some distance from any natural areas. The site contains exotic, native and indigenous tree species. The trees are primarily within the landscaped setbacks along the northern and southern boundaries of the site but also within the Kent Road setback and along the edges of the hardstand car parking areas.

The Arborist Report prepared by Canopy Consulting details the health and condition of site trees and those on adjoining properties and how they may pose a constraint to any potential development on the site. The Arborist Report allocates a significance rating and retention value to the trees. The Arborist Report will inform the siting and design of future buildings, including retention of significant trees and supplementary tree planting to increase the urban tree canopy coverage as requested by Council.

Q9. Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?

No significant effects - the detailed impact assessment reports prepared by the specialist consultants and lodged with the Draft Planning Proposal demonstrate the proposed increase in FSR and the complementary additional uses will not result in any significant environmental effects.

The site has already been developed for industrial purposes and is free of major constraints. The indicative concept design has demonstrated the potential built form is consistent and compatible with the locality and will not result in any major impacts compared to the potential built form in accordance with the current controls. Further, the complementary land use activities can be accommodated without any impacts on the local road network and will enhance the appearance and amenity of the future development.

The following sections provide a comprehensive summary of the technical deliverables submitted with the Draft Planning Proposal and demonstrate the appropriateness of the proposed changes to BLEP 2021.

Urban Design / Context Report

Lacoste and Stevenson have prepared concept designs which comply with the existing 1.2:1 FSR. The 1.2:1 FSR concept designs provide a useful comparison against the 2:1 FSR concept designs and demonstrate the proposed FSR uplift will have negligible impact on the overall bulk and scale of future development at the site. The Urban Design / Context Report prepared by Lacoste and Stevenson provides a detailed discussion of the two indicative schemes. The key features and differences of each scheme are discussed below.

The building massing for the 1.2:1 scheme has the same footprint and height limit as the 2:1 scheme. However, the 1.2:1 FSR concept designs include three levels of warehousing with higher finished floor levels (**FFL**), while the 2:1 FSR designs provide for four levels of warehousing, which allows for a greater flexibility in tenancy options with more levels and a variety of spaces and floor heights. Only large tenancies can be accommodated in the 1.2:1 scheme due to fewer floor levels, providing less building articulation compared to the 2:1 scheme (refer **Figure 21**).

Both schemes provide alternative uses located along Coward Street which activates the street frontage. The 2:1 scheme allows for a cafe, restaurants, neighbourhood shop and recreational activities over three levels in front of both buildings along Coward Street. The 3-storey height of the other uses provides a street edge and screening to the warehouse volume behind, when viewed from the street. In comparison, the 1.2:1 scheme provides for one level of cafe, restaurant and neighbourhood shop use along Coward Street in front of QF2

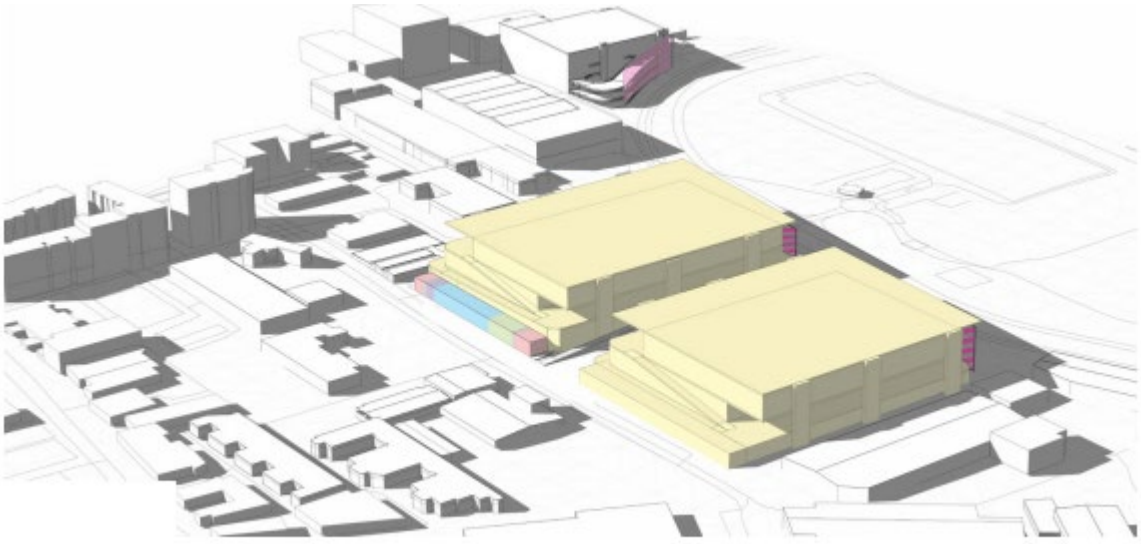
only. Given the lower height of other uses, the warehouse volume located behind is visible and more prominent in street views. Additionally, as the alternative uses are located only on the eastern side of the site, the western warehouse wall provides no amenity or street activation along this edge of approximately 200 metres (refer **Figure 22**).

Both schemes preserve links from the site to the private road network connecting the site to airside. The site circulation is comparable between the schemes however, 1.2:1 scheme provides car parking on only one warehouse site (QF2) while the 2:1 scheme provides carparking on both the sites. The limited car parking in the 1.2:1 scheme will lead to lengthy pedestrian movements to the QF1 warehouse from the site car parking area.

Figure 21 Indicative Massing of 2:1 FSR and 1.2:1 FSR – View South-East

Picture 11 Indicative massing of 2:1 FSR

Source: *Lacoste + Stevenson, 2023*



Picture 12 Indicative massing of 1.2:1 FSR

Source: *Lacoste + Stevenson, 2023*

Figure 22 Indicative Massing of 2:1 FSR and 1.2:1 FSR – Coward Street View

Picture 13 2:1 FSR - Coward Street, heading west

Source: ***Lacoste + Stevenson, 2023***

Picture 14 1.2:1 FSR - Coward Street, heading west

Source: ***Lacoste + Stevenson, 2023***

Transport Impact Assessment

CBRK has prepared a Transport Report which assesses the potential traffic impacts of the Draft Planning Proposal, including the increased floorspace associated with the increased FSR and the complementary land use activities proposed to be included in Schedule 1 of BLEP 2021.

Detailed consideration was given to the indicative concept design, including the staged approach to the future redevelopment of the site, to understand the potential traffic impacts. Each of the referral comments from the Scoping Proposal Advice (including the attachments) have been addressed in the impact assessment and preparation of the report, including TfNSW, SACL and Council's Engineer.

The key findings and recommendations of the Transport Report are summarised below:

- The site is well located in terms of its public transport access, including multiple local and regional bus services and rail services within 500 metres or five minutes walking distance.
- The site also benefits from existing and planned active transport connections within the locality. These may be enhanced through the future development of the site and associated upgrades to existing facilities as outlined in **Section 5.3** of the Draft Planning Proposal. A Green Travel Plan will also be prepared with the future DA.
- The indicative concept design demonstrates on-site car parking (including accessible parking), motorcycle parking, bicycle parking and end-of-trip facilities can be provided in accordance with Council's requirements. The car park layout and internal circulation will be provided in accordance with relevant Australian Standards.
- The proposed access arrangements via Coward Street and Kent Road are considered appropriate based on the scale of the development shown in the indicative concept design, including the separation of heavy and light vehicles and internal access arrangements. This includes provision for the existing truck access to the Qantas airside operations which will be maintained via an internal connection to the Jet Base.
- The future loading areas will be designed in accordance with relevant Australian Standards and adequate space is available on the site to accommodate emergency vehicle access.
- The SIDRA network modelling assesses the four intersections on O'Riordan Street and four intersections on Kent Road and Coward Street as identified by TfNSW. The assessment also addresses the potential cumulative impacts of the consolidated landholding (including QF1, QF2, QF3 and QF4) for 10 years traffic growth in accordance with TfNSW requirements.
- The assessment of the potential traffic impacts of the indicative concept design using the SIDRA modelling has confirmed:
  - *the signalised intersection of Qantas Drive/O'Riordan Street/Joyce Drive would operate with average delays of less than 30 seconds per vehicle during the weekday morning peak period. This represents level of service B/C, a good to satisfactory level of intersection operation. In the weekday afternoon peak period the intersection would operate with average delays of less than 35 seconds per vehicle. This represents level of service C, a satisfactory level of service;*
  - *the signalised intersection of O'Riordan Street and Robey Street would operate with average delays of less than 15 seconds per vehicle during the weekday morning and afternoon peak periods. This represents level of service A/B, a good level of intersection operation;*
  - *the signalised intersection of O'Riordan Street and King Street would operate with average delays of less than 45 seconds per vehicle during the weekday morning peak period. This represents level of service C/D, a satisfactory level of intersection operation. In the weekday afternoon peak period the intersection would operate with average delays of less than 25 seconds per vehicle. This represents level of service B, a good level of service;*
  - *the signalised intersection of O'Riordan Street/Bouke Road would operate with average delays of less than 25 seconds per vehicle during the weekday morning and afternoon peak periods. This represents level of service B, a good level of intersection operation;*
  - *the signalised intersection of Coward Street and Bouke Road would operate with average delays of less than 40 seconds in the weekday morning peak hour. In the afternoon peak period, the*

intersection would operate with average delays of less than 35 seconds per vehicle. These delays represent level of service C, a satisfactory level of intersection operation;

- *the signalised intersection of Kent Road and Ricketty Street would operate with average delays of less than 35 seconds in the weekday morning peak hour. In the afternoon peak period, the intersection would operate with average delays of less than 40 seconds per vehicle. These delays represent level of service C, a satisfactory level of intersection operation; and*
- *the signalised intersection of Gardeners Road/Kent Road would operate with average delays of less than 35 seconds per vehicle during the weekday morning and less than 30 seconds per vehicle during the weekday afternoon peak periods. This represents level of service C in the morning and level of service B/C in the afternoon peak periods, a satisfactory level of intersection operation.*

- Based on the above, the following modifications are required to accommodate the future development traffic at the intersection of Kent Road and Coward Street:
  - *reconfigure the Coward Street western approach to provide a separate left turn lane and shared through and right turn lane;*
  - *extend the no stopping restriction on the Coward Street western approach from some 30 metres to some 65 metres. The extended no stopping restriction would only apply between 3.00pm and 7.00pm Monday to Friday; and*
  - *extend the no stopping restriction on the Kent Road southern approach from some 20 metres to some 55 metres. The extended no stopping restriction would only apply between 3.00pm and 7.00pm Monday to Friday.*
- Upon implementation of the above measures, the intersection of Kent Road and Coward Street would operate with average delays of less than 45 seconds per vehicle during the weekday morning and less than 50 seconds per vehicle during the weekday afternoon peak periods. This represents level of service C/D in the morning and level of service D in the afternoon peak periods, which equates to a satisfactory level of intersection operation.
- The cumulative impact assessment, including traffic generated by the consolidated land holding, demonstrates the road network would operate at satisfactory or better levels of service in the weekday morning and afternoon peak periods with the implementation of the intersection modifications.
- For the intersections along O'Riordan Street, the cumulative impact analysis found:
  - *the signalised intersection of Qantas Drive/O'Riordan Street/Joyce Drive would operate with average delays of less than 30 seconds per vehicle during the weekday morning and afternoon peak periods. This represents level of service B/C, a good to satisfactory level of intersection operation;*
  - *the signalised intersection of O'Riordan Street and Robey Street would operate with average delays of less than 15 seconds per vehicle during the weekday morning and afternoon peak periods. This represents level of service A/B, a good level of intersection operation;*
  - *the signalised intersection of O'Riordan Street and King Street would operate with average delays of less than 25 seconds per vehicle during the weekday morning and afternoon peak periods. This represents level of service B, a good level of intersection operation;*
  - *the signalised intersection of O'Riordan Street/Bouke Road would operate with average delays of less than 25 seconds per vehicle during the weekday morning and afternoon peak periods. This represents level of service B, a good level of intersection operation.*
- For the intersections along Kent Road and Coward Street, the cumulative impact analysis found:
  - *the signalised intersection of Coward Street and Bourke Road would operate with average delays of less than 40 seconds in the weekday morning peak hour. In the afternoon peak period, the intersection would operate with average delays of less than 35 seconds per vehicle. These delays represent level of service C, a satisfactory level of intersection operation;*
  - *the modified signalised intersection of Coward Street and Kent Road would operate with average delays of less than 45 seconds per vehicle during the weekday morning and afternoon peak periods. This represents level of service C/D, a satisfactory level of intersection operation;*

– *the signalised intersection of Kent Road and Ricketty Street would operate with average delays of less than 35 seconds in the weekday morning peak hour. In the afternoon peak period, the intersection would operate with average delays of less than 40 seconds per vehicle. These delays represent level of service C, a satisfactory level of intersection operation; and*

– *the signalised intersection of Gardeners Road/Kent Road would operate with average delays of less than 35 seconds per vehicle during the weekday morning and less than 30 seconds per vehicle during the weekday afternoon peak periods. This represents level of service C in the morning and level of service B/C in the afternoon peak periods, a satisfactory level of intersection operation.*

Overall, the Transport Report demonstrates the Draft Planning Proposal can be supported from a transport perspective. A further detailed assessment of the potential impacts will be required at the DA stage to confirm the preliminary findings based on the final detailed design.

Visual Impact Assessment

Paddock Landscape Architects have prepared a VIA which investigates the potential visual impacts associated with the likely future development.

The VIA provides a detailed assessment of the sensitivity and magnitude of the proposed FSR changes from a variety of surrounding public and private viewpoints, including from Qantas Drive and the ground plane. The visual impact at Qantas Drive is considered moderate given the introduction of the scale and height of the likely future development. The retention of the existing established vegetation within the project site along the southern boundary would screen the lower portion of future new buildings.

The VIA compares the existing baseline condition with two indicative concept schemes for the site, one being for a maximum FSR of 1.2:1 and another with an increase to the maximum FSR to 2:1. The assessment determines the concept schemes do not result in any significant visual impacts. The effects of the future redevelopment would include impacts to a mix of distant and close views, particularly from the north and west. The existing developments to the east effectively screen the project site. The 44-metre building height control means any future development within these areas would effectively screen the concept schemes in the long term, particularly from the north and west.

The visual impacts of the concept schemes would be moderate in the short to medium term. However, it is not expected there would be any substantial differences in scale and character from the surrounding existing built form. The visual impacts of the concept schemes in the long term would be significantly reduced when the surrounding areas are developed to the 44-metre height control.

The VIA includes mitigation measures which have been incorporated into the concept schemes as provided in **Section 4**. The recommended mitigation would be further refined and implemented in the design of any future development. The mitigation measures include:

- Retention of existing trees and vegetation to the perimeter of the site to screen any future development and provide filtered views to the site.
- Articulation of the built form so that it provides contrast and interest to the façade, particularly the northern facade along Coward Street.
- Creation of a new public domain and frontage along Coward Street that defines the primary entry to the site for pedestrians and cyclists.
- Locating active uses, such as cafes, restaurants, neighbourhood shops, recreation uses etc, along the Coward Street frontage to provide activation to the public domain and a built form at the pedestrian scale.
- Locating noise producing uses, such as loading docks and heavy vehicle access ramps away from surrounding sensitive uses where possible.
- Incorporation of planted landscape terraces / green infrastructure (such as green walls, roofs, terraces etc) within the structure to provide greening to the streetscape and built form.
- Incorporation of significant public artwork structures within the southern facades addressing Qantas Drive to form part of a broader suite of artworks addressing Qantas Drive and views from the south.
- A central ‘green spine’ to allow for separation between structures and for natural ventilation and light into the site in addition to providing visual relief between the built forms.

- New landscape areas that allow for supplementary native tree plantings not just to the boundaries of the site'.
- Selection of materials and finishes that limit the amount of contrast and reflection with the surrounding landscapes.

Statement of Heritage

Urbis have prepared an HIS which accompanies the Draft Planning Proposal. The HIS assesses the potential heritage impact of the proposed plan amendments, including a review of the indicate concept design. The site is not a listed heritage item and it is not within a heritage conservation area. The HIS confirms the site has no known significant historical associations and has no improvements of any aesthetic value. The existing structures on the site are not required to be retained on heritage grounds and may be removed as part of future works that the Planning Proposal will facilitate.

The HIS also considers the potential impacts of the Draft Planning Proposal on the following heritage items within the locality:

- *Item 260 Alexandra Canal*, a heritage item of state significance also listed as Item 01621 on the NSW State Heritage Register;
- *Item 298: Commonwealth Water Pumping Station and Sewage Pumping Station No 38*, a heritage item of local significance;
- *Item 382: Ruins of the former Botany Pumping Station*, a heritage item of local significance; and
- *Item 383: Sydney (Kingsford Smith) Airport group*, a heritage item of local significance.

No heritage items will be altered or impacted by the Draft Planning Proposal. The HIS confirms the site is visually separated from the Sydney Airport heritage items and the Alexandra Canal. The indicative concept design demonstrates the proposed FSR of 2:1 will not result in an inappropriate built form and will provide for an industrial/logistical development consistent with the aviation character of the locality, including the Sydney Airport heritage item. As such, the Draft Planning Proposal is acceptable from a built heritage perspective.

An Aboriginal Objects Due Diligence Assessment (**AODD**) has also been prepared by Urbis to support the Draft Planning Proposal. The AODD outlines the investigations undertaken to confirm whether any known Aboriginal objects or Aboriginal places are located within the subject area or likely to occur in the subject area. The AODD concludes:

- No Aboriginal objects or Aboriginal places are registered within the subject area.
- No previous Aboriginal archaeological investigations have been identified that directly address the subject area.
- The subject area is located within 200m of Shea's Creek, which is considered an archaeologically sensitive landscape feature under the Due Diligence Code.
- Historical activities within the subject area, including clearing of vegetation, cultivation and agriculture, and the construction and demolition of buildings, have caused ground disturbance that remains clear and observable.
- A previous geotechnical investigation of the subject area confirms ground disturbance to a depth of approximately 1.5-4.4m.
- As there are no known Aboriginal sites within the subject area and historical human activity has caused clear and observable changes to the land's surface, the Due Diligence Code does not require further archaeological assessment of the subject area.

Based on the above, no provisions for conservation of Aboriginal objects or places are required as part of the Draft Planning Proposal request and no further archaeological investigations are required. The AODD will be updated as part of any future DA and an Aboriginal Cultural Heritage Assessment prepared to support any physical works at the site.

Landscape Concept Plan

Paddock Landscape Architects have prepared a Landscape Concept Plan which is provided at **Appendix H** and illustrated in **Figure 23** overleaf. The indicative concept schemes have been designed to allow for a

generous landscape area between the two buildings providing a ‘green spine’ to allow for an area of public access complimenting the public domain along the frontage of the ground floor tenancies. Kent Road will include a deep landscape frontage with areas of public access to supplement surrounding public open space areas. The landscape design seeks to retain significant existing trees around the perimeter of the site, particularly established native trees along the Coward Street and Kent Road frontages, in addition to the southern boundary facing Qantas Drive. The retention of trees around the perimeter of the site will act as a screen for any future development and provide filtered views to the site.

The Arborist Report will inform the siting and design of future buildings, including retention of significant trees and supplementary tree planting to increase the urban tree canopy coverage as requested by Council. Future planting will include a diverse species mix of environmentally and culturally important species that reflect the surrounding areas wetlands, grasslands, heathlands, scrub and dry sclerophyll forests.

Figure 23 Landscape Concept Plan

Source: *Paddock Landscape Architects, 2023*

Stormwater

A Civil Engineering Report (**CER**) including Water Cycle Management Strategy (**WCMS**), Surface Water Impact Assessment and Integrated Water Management Plan has been prepared by Costin Roe and is provided at **Appendix J.**

The CER undertakes a civil engineering assessment of the indicative concept schemes and provides an assessment of the civil engineering characteristics of the site and technical considerations in relation to earthworks and geotechnical considerations. A Water Cycle Management Strategy (**WCMS**) has also been developed which seeks to address the competing demands placed on a region’s water resources, while optimising the social and economic benefits of development and enhancing and protecting the environmental values of receiving waters.

A summary of the how each of the WCMS objectives will be achieved are described below.

- Stormwater Quantity Management: the intent of the criterion is to reduce the impact of urban development on existing drainage system by limiting post-development discharge within the receiving waters to the pre-development peak, and to ensure no affectation of upstream, downstream or adjacent

properties. The site currently discharges directly into a Sydney Water stormwater asset. Costin Roe consulted Sydney Water in the prepared of the CER to determine the stormwater management requirements for future development of the site. Sydney Water confirmed that attenuation of stormwater runoff is not required for future development as per the concept designs.

- Stormwater Quality Management: the intent of this criterion is to target pollutants that are present in stormwater runoff to minimise the adverse impact these pollutants could have on downstream receiving waters. A series of Stormwater quality improvement devices have been incorporated in the design of the development. The proposed management strategy for any future development will include the following measures:
    - Primary treatment of external areas will be made via pit basket inserts at all surface inlet pits.
    - Tertiary treatment of stormwater from the northern lot using proprietary filter cartridges within treatment tanks.
    - Some treatment will also be present by provision of rainwater reuse tanks on development sites through reuse and settlement within the tanks.
- Flood Management: The concept schemes have considered flooding and large rainfall events in relation to local runoff and overland flow paths as discussed in the following Flood Impact Assessment Section below.
- Water Demand Reduction / Rainwater Reuse: Rainwater reuse measures will be provided as part of the design of any future development. Rainwater reuse will be required to reduce demand on non-potable uses by 50-70%. The reduction in demand will target non-potable uses such as toilet flushing and irrigation.
- Stormwater Management During Construction: A construction stormwater management plan and associated erosion and sediment control measures will be required for any future development based on Landcom Blue Book and Council requirements. The management measures take a staged approach from initial site establishment, construction stages and the period between the completion of the proposed infrastructure works and development of site.

As per general engineering practice and the guidelines of Council, the proposed stormwater drainage system for future development will comprise a minor and major system to convey collected stormwater run-off to the legal point of discharge, being the Sydney Water channel that bisects the site. The minor system is to consist of a piped drainage system which has been designed to accommodate the 1 in 20-year ARI storm event (Q20). This results in the piped system being able to convey all stormwater runoff up to and including the Q20 event. The major system will be designed to cater for storms up to and including the 1 in 100-year ARI storm event (Q100). The major system will employ the use of defined overland flow paths, such as roads and open channels, to safely convey excess run-off from the site.

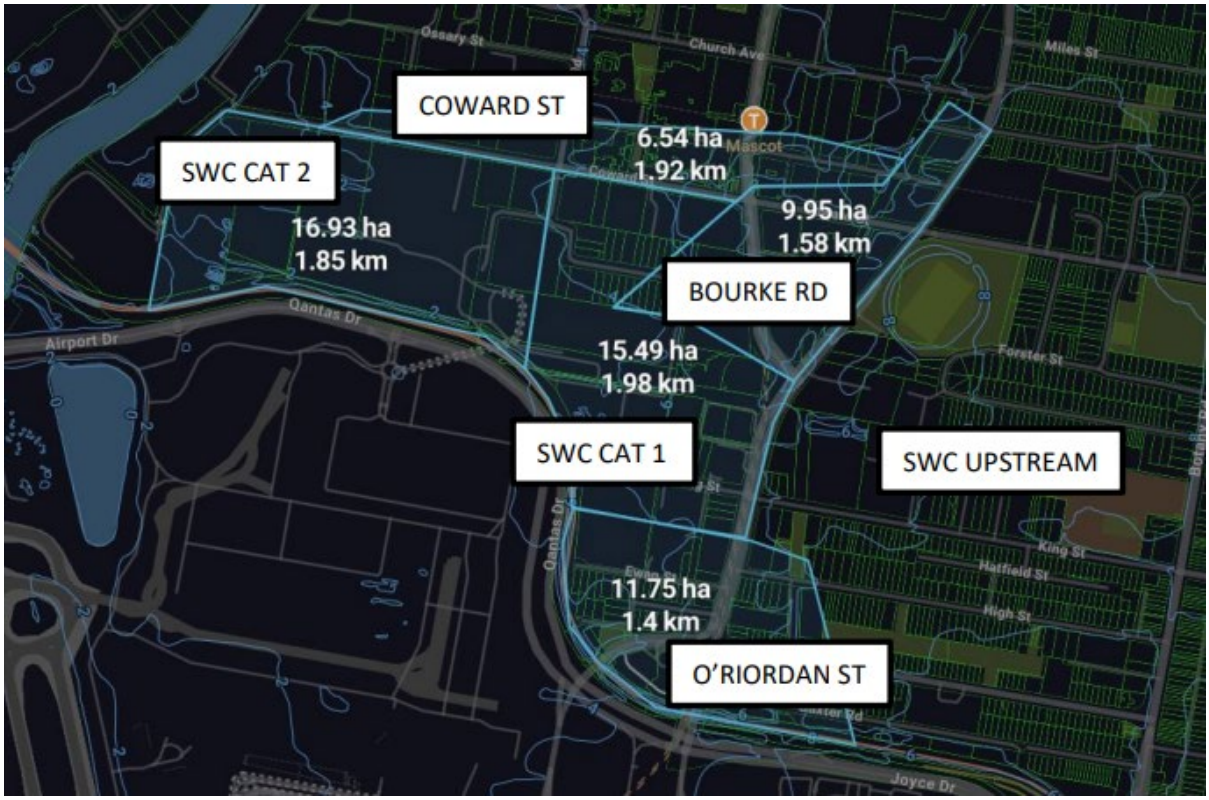
Flood Impact Assessment

A Flood Risk Assessment has been included in the Civil Engineering Report prepared by Costin Roe and is provided at **Appendix J.**

The contributing catchment comprises a combination of commercial and industrial land use with approximately 90% impervious surfaces. For the pre-development condition, the total catchment area contributing to the site flooding is approximately 44 ha, with a larger 45 ha catchment discharging into the upstream portion of the Sydney Water stormwater channel, refer **Figure 24.**

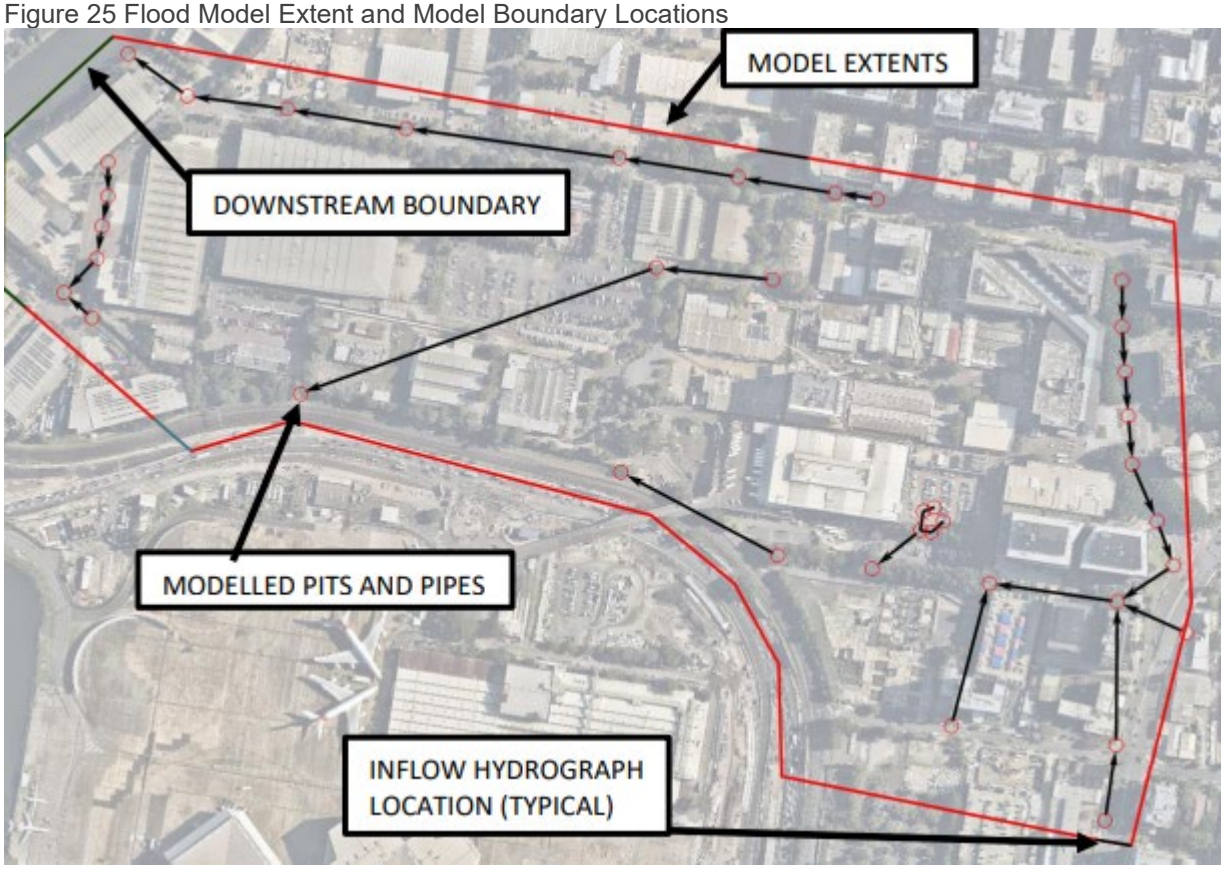
Flood hydrographs were assessed based on the contributing catchment. The model begins approximately 500 metres upstream of the site and extends to the Alexandria Canal, approximately 100 metres downstream of the site. The results indicate the upstream boundary was located sufficiently upstream of the site to ensure the extent of predicted impacts from the development would be covered and any modelling iterations would be resolved clear of the development affectation zone. The downstream water levels in Qantas Drive have been based on a normal outflow and design gradient of 1%. The tailwater level the Sydney Water stormwater channel discharging into the Alexandra Canal have been set at an assumed tailwater level of 2.4 metres in the 1% AEP storm based on the Mascot, Roseberry and Eastlakes flood study (commissioned by the former Botany Bay Council, 2019), refer **Figure 25.** The Flood Assessment then established a TUFLOW Model using defined parameters as set out in the CER. The TUFLOW modelling and assessment confirms there is negligible impact on upstream, downstream and/ or adjoining sites as a result of the proposed developments.

Figure 24 Site Catchments and External Contributing Catchment (east)



Source: Costin Roe Consulting, 2023

Figure 25 Flood Model Extent and Model Boundary Locations



Source: Costin Roe Consulting, 2023

The indicative concept designs have been developed to consider flooding and large rainfall events in relation to local runoff and overland flow paths. The future development will incorporate the following measures in response to flooding requirements:

- All buildings are sited 500mm above the 1% AEP flood level.
- The majority of the existing overland flow path through site from Kent Road is captured in a drainage apron and conveyed towards the Sydney Water channel south of the site.
- The remainder of the overland flow path through the site from Kent Road to Coward Street is routed through the undercroft carpark and maintained.
- Discharge from the site is sent to the Sydney Water channel running between the lots.

Preliminary Site Investigation

Reditus prepared a PSI in August 2021 to support the divestment of the site by Qantas. The proponent sought a verification letter from Reditus to confirm the validity of their original advice. A copy of their letter dated 28 April 2023 is submitted with the Draft Planning Proposal.

The verification letter confirms their original findings and recommendation to prepare a DSI which focuses on the identified Aeras of Environmental Concern (**AEC**) to quantify potential soil and groundwater contamination issues associated with historical and current activities occurring on the site. Further consideration of the DSI prepared by Environmental Resources Management Australia (**ERM**) is provided below.

Detailed Site Investigation

ERM was engaged by Qantas to undertake a Due Diligence Contamination Assessment to facilitate the divestment of the site by Qantas. Similar to the PSI, a verification letter was sought from ERM to verify the validity of their original findings and confirm their report meets the requirements for a DSI. A copy of their correspondence dated 8 May 2023 is submitted with the Draft Planning Proposal.

ERM has confirmed their Due Diligence Assessment was prepared to respond to the matters identified in the PSI, including soil and groundwater investigation works, surface water/sediment sampling, laboratory analysis of the samples and preparation of a factual investigation report. Based on the results of their investigations, ERM concluded the following:

- Fill materials are located within the northern part of the site and the south-eastern portion of the site.
- It is estimated seven underground storage tanks are present on the site, however, there is a low risk of significant/widespread contamination associated with these facilities.
- Elevated methane has previously been identified in the northern and north-western portions of the site, however, the more recent investigations undertaken by Reditus identified a low risk of harm from methane within on-site building structures.
- Asbestos was identified in several location which was attributed to previous filling for construction purposes. Where intrusive works are to be undertaken, an Environmental Management Plan will need to be prepared.
- Minor exceedances for various heavy metals were identified. However, these are unlikely to pose a risk of harm based on the proposed land use activities.
- Previous investigations undertaken by Reditus identified elevation concentrations of organochlorine and organophosphorus pesticides (**OCP/OPP**), however, these were considered by ERM to be an isolated hotspot and not indicative of significant or widespread contamination.
- Samples collected close to the transformer were less than the standard limit of reporting (**LOR**) and unlikely to pose a risk of harm to identified receptors.
- The elevated concentrations of PFAS in the collected groundwater samples was attributed to the oil/water separator and not considered to be indicative of significant or widespread PFAS contamination. Samples from additional wells were considered localised and not indicative of a widespread impact. However, those close to the site boundary should be removed with ongoing monitoring to assess effective removal.

Overall, it is concluded the previous site contamination investigations do not identify any major risks which would impact on the Draft Planning Proposal, including the ongoing use of site for primarily industrial/ commercial purposes (as per the concept plans). However, appropriate management of identified impacts will be required to facilitate the redevelopment of the site.

Preliminary Hazard Assessment

Riskcon have prepared a Pipeline Hazard Analysis which is submitted for assessment with the Draft Planning Proposal. The purpose of the Pipeline Hazard Analysis is to assess the potential impacts future development may have on underground pipelines in the vicinity of the site.

The Pipeline Hazard Analysis identified that there are four high pressure dangerous goods or gas pipelines in the Mascot area which may be impacted by future development at the site:

- Mobil Oil Australia Pty Ltd (Mobil) – liquid pipeline (terminal and pipeline no longer in use).
- Qenos Pty Ltd (Qenos) – high-pressure gas pipeline (same as 559 ST 3500 kPa - refer below).
- Vopak Terminals Australia Pty Ltd (Vopak) – liquid pipeline from Vopak to Sydney Ports Bulk Liquids Berth.
- Jemena – high pressure gas pipeline (No. 559 ST 3500 kPa), adjacent to Qantas Drive and the Sydenham to Botany Rail Corridor.

The Mobil and Vopak pipelines are over four kilometres from the site and there will be no impact to these pipelines from any subsequent future development. The Jemena high pressure gas pipeline (supplying gas to the Qenos site) is adjacent to the Sydenham to Botany Rail Corridor. The closest structure shown in the indicative concept design which has been prepared in association with the Draft Planning Proposal is 32 metres from the pipeline.

Freyssinet and Qenos were consulted to review the indicative concept design and identify any potential impacts to the pipeline(s). It was confirmed there would be no expected impact to the Jemena pipeline arising from the future development of the site. Accordingly, the Pipeline Hazard Analysis concludes there will be no impact to the high-pressure dangerous goods or gas pipelines based on the proposed plan amendments or the likely future development of the site.

Acoustic Assessment (Aircraft Noise)

Renzo Tonin & Associates have prepared an Acoustic Assessment (**Appendix N**) which includes a review of acoustic matters relevant to the Planning Proposal with consideration of the relevant policies, guidelines and standards required by Bayside Council and the NSW EPA. The assessment considers aircraft noise exposure onto the site and noise generation by likely activities associated with future development of the site.

Existing Noise Conditions

Noise monitoring was carried out at both the nearest and potentially most affected residential locations surrounding the site. Unattended long-term noise monitoring was carried out for continuous periods during March/April 2023 to measure ambient and background noise levels. At each of the noise monitoring locations, road traffic noise dominated the existing noise environment.

Aircraft Noise

Future developments potentially impacted by aircraft noise should be assessed to determine if they can achieve the noise level requirements of *Australian Standards AS2021 – Acoustics Noise Intrusion – Building Siting and Construction*. The ANEF chart provides a predicted cumulative exposure to aircraft flyover noise in communities near aerodromes. Based on the Sydney Airport ANEF 2039 chart the site is located within the ANEF 25 to 30 contours and the is classified as conditionally acceptable. Potential aircraft noise levels were determined for the minimum and maximum distances from the site boundary, with the highest aircraft noise levels from this process then identified for the assessment.

The Acoustic Assessment considers the aircraft noise reduction (**ANR**) value for commercial and industrial land uses. The ANR is calculated by subtracting the indoor design level from the maximum aircraft noise level. The resulting value is an estimate of the ANR in dB(A) to be achieved by the building's envelope. To achieve the required ANR for the identified spaces, typical commercial and industrial façade constructions will likely achieve these internal noise levels. The exception is where a future design or tenant fitout

proposes to include noise sensitive spaces (i.e. private offices and meeting/conference rooms) on the building façade, or as part of the roof level tenancy. In these cases, further review is required to determine the appropriate building constructions to achieve the required internal noise levels, and additional acoustic treatments may need to be considered.

The Acoustic Assessment recommends a detailed acoustic assessment be undertaken to support any future DA to determine suitable mitigation and designs recommendations to be implemented in any future design.

Operational Noise Emissions

The Acoustic Assessments seeks to quantify the potential operational noise emissions from the future development of the site. The noise sources associated with the operation of future development of the site are expected to be those of typical warehousing and distribution activities with 24/7 operations. There will also be minor contributions from the commercial tenancies, recreational facilities (indoor and outdoor) and cafes or restaurants. The noise sources associated with the operation of the future development of the site are likely to include the following:

- truck movements within the warehouse facility, including along internal access roads, and movements up and down ramps;
- loading dock receiving and dispatching activities associated with the warehouses, which could potentially include temperature-controlled warehouse/distribution activities;
- internal warehouse activities, which can breakout via roller doors and façade elements;
- passenger vehicle movements and car parking; and
- office related activities (fixed mechanical plant)

Based upon the distance to the nearest residential receivers, it is expected that noise mitigation and management measures will likely be required to be incorporated into the design of any future development applications, this will especially be the case where future tenant activities are required to take place during the night period. The potential future development of the site and specific design details are not yet known, including noise generation from future tenancies. As such, it is not possible to evaluate in detail the specific noise generating activities within the development, and then the associated feasible and reasonable mitigation measures. The Acoustic Assessment provides a range of noise mitigation and management measures that will likely be required to be incorporated into the future design stages as part of any future development application.

A preliminary traffic noise assessment was undertaken, including approximate numbers of heavy vehicles that could operate through the facility. The preliminary assessment found the site could generate up to 940 heavy vehicle movements (inbound + outbound) during the day (7:00am to 10:00pm) and up to 200 heavy vehicle movements (inbound + outbound) during the night (10:00pm to 7:00am), and not increase existing road traffic noise levels at nearby noise sensitive receivers by more than 2 dB(A). As the likely future tenants are not known for the future development of the site, the likely day and night road traffic profile (ie. 24-hour traffic profile with vehicle breakdown) generated are not known as they driven by specific development type and tenant specific factors. A specific assessment of potential road traffic noise increases as a result of future site operations will be prepared as part of any future development application.

Aviation Safety

Landrum and Brown have prepared an Aeronautical Impact Assessment which considers whether the Draft Planning Proposal is likely to have any implications for aviation safety and having regard to the proximity of the site to Sydney Airport.

The report assesses the proposed concept schemes against the guidelines under the National Airports Safeguarding Framework (**NASF**) and the BLEP 2021 to determine whether future development can comply with the various airspace requirements. The findings of the assessment are discussed in **Table 15**.

Table 15 NASF Assessment

Guideline	Description	Conclusion
Guideline A: Measures for Managing Impacts of Aircraft Noise	Provides recommendations to local planning authorities on the implementation of noise policies within their legislative frameworks using principles set out in *Australian Noise Exposure Forecast (**ANEF**) System* and the *Australian Standard AS 2021-2015 Acoustics – Aircraft Noise Intrusion – Building Siting and Construction (AS2021)*	The development site is considered as 'Light Industrial' and is acceptable within ANEF zones as per the Australian Standard AS 2021:2015 Acoustics - Aircraft Noise.
Guideline B: Managing the Risk of Building Generated Windshear and Turbulence at Airports	Provides recommendations for a risk based approach to the consideration of influences on the wind conditions on runways	The Draft Planning Proposal and likely future development in accordance with the revised FSR is unlikely impact the wind conditions on runway 16R/34L. Wind flow over the proposed development will be broken by the various developments up and down wind of the future building(s). More complex simulation/modelling assessment of wind conditions as outlined in Steps 4 and 5 of the guideline is not required.
Guideline C: Managing the Risk of Wildlife Strikes in the Vicinity of Airports	Provides recommendations to local planning authorities on the implementation of policies to limit the impact of (generally flying) wildlife on aircraft operations within their legislative frameworks using principles set out in International Civil Aviation Organisation (**ICAO**) documentation.	The future development must not impact the risk of wildlife strikes in the vicinity of Sydney Airport through appropriate flora selection and ensuring no 'incompatible' uses are permitted. It is noted 'warehouse (non-food storage)' has a very low wildlife attraction risk, while 'warehouse (food storage' has a low risk which can be monitored. These matters will be addressed at the DA stage, including the detailed landscape drawings and the proposed uses to be accommodated within the future development.
Guideline D: Managing the Risk of Wind Turbine Farms as	Provides recommendations to local planning authorities and	The planned development complies with the relevant

Guideline	Description	Conclusion
Physical Obstacles to Air Navigation	proponents of wind farm developments on the implementation of policies to limit the impact of such development on aircraft operations.	requirements and no action is required.
Guideline E: Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports	Provides recommendations to local planning authorities and airport operators on the implementation of policies to address the risk of distractions to pilots of aircraft from lighting and light fixtures near airports.	Future design and construction of the future development must limit the upward light (measured 3° to the horizontal) to no more than 150 candelas during both construction and ultimate operation. These matters will be satisfactorily addressed at the DA stage.
Guideline F: Managing the Risk of Intrusions into the Protected Airspace of Airports	Provides recommendations to local planning authorities and airport operators on the implementation of policies to address the risk of distractions to pilots of aircraft from lighting and light fixtures near airports	The likely future development shown in the indicative concept design (which complies with the maximum height of building control in BLEP 2013) will not infringe the Obstacle Limitation Surfaces (**OLS**) and Procedures for Air Navigation Services – Operations (**PANS OPS**). However, further consideration will need to be given to temporary craneage during the construction phase which may infringe the surfaces. This will be addressed at the DA stage, including consultation with Sydney Airport.
NASF Guideline G: Protecting Aviation Facilities – Communication, Navigation and Surveillance (**CNS**)	Provides land use planning information to enable protection of CNS facilities which support the systems and processes in place by Airservices Australia, the Department of Defence or other agencies under contract with the Australian Government, to safely manage the flow of aircraft into, out of and across Australian airspace	The likely future development as shown in the indicative concept design does not infringe the Distance Measuring Equipment (**DME**). However, further consideration will need to be given to temporary craneage during the construction phase which may infringe the DME Building Restriction Area. The likely future development does not infringe the Sydney Airport TAR equipment

Guideline	Description	Conclusion
		restriction. Once including temporary craneage, it will potentially infringe the Terminal Area Radar (**TAR**) Building Restriction Area. Each of these matters will be addressed at the DA stage, including consultation with Airservices.
NASF Guideline H: Protecting Strategically Important Helicopter Landing Sites	Purpose of this document is to protect important Helicopter Landing Sites from infringements	No action is required regarding Helicopter Landing Sites.
NASF Guideline I: Public Safety Areas	Provides guidance to Australian Government, state, territory and local government decision makers on the assessment and treatment of potential increases in risk to public safety which could result from an aircraft incident or development proposal in areas near the end of an airport runway. Guideline informs a more consistent approach to the application of Public Safety Areas at and near Australian airports.	No action is required regarding the Public Safety Areas.

The Aeronautical Impact Assessment concludes there are no direct aeronautical related impediments in relation to the Draft Planning Proposal or the indicative concept design which provides for a FSR of 2:1. Any future development DA will need to respond to the matters listed in the table above, including a further detailed assessment of the architectural drawings and consultation with aviation authorities.

ESD Outcomes

The Draft Planning Proposal is support by a Sustainability Report prepared by E-Lab which details the proposed ESD strategies and commitments for the future development of the site. It provides for the delivery of an affordable and sustainable outcome and a strong commitment to sustainability in the design, construction and operation of the future development. The proposed sustainability elements include:

- Targeting 5 Star Green Star Design & As Built v1.3 Certification for future development of the site.
- No gas on-site to reduce fossil fuel consumption.
- Significant on-site energy generation through a major solar PV array on the roof to reduce operational energy and GHG emissions associated with the site.
- Implementation of Water Sensitive Urban Design Principles.
- Water recycling through rainwater storage with excess discharged into bio-retention and detention areas.
- Targeting less than 5kg of Construction and Demolition waste per square meter of GFA going to landfill.

- Parking capacity for electric vehicles to prepare for a decarbonised future.
- Urban heat island effect mitigation strategies.
- Following a range of sustainability initiatives across the site spanning energy efficiency, thermal performance, indoor environment quality, waste management, and comfort.

The ESD strategies and commitments will be further developed during subsequent design stages at the DA stage. This approach is consistent with the recent detailed design for the QF3 SSDA which was subject to a rigorous review of ESD and sustainability measures as part of the State Design Review Panel process and preparation of the Environmental Impact Statement.

Q10. Has the planning proposal adequately addressed any social and economic effects?

Yes – refer below.

Economic Impact

An EIA has been prepared by Urbis and is provided at **Appendix I.** Economic impact assessments were undertaken in relation to the additional warehouse, office, retail, and recreational floorspace within their respective catchments, with all uses found to have a positive or acceptable impact. The key findings of the economic impacts related to each land use and the overall employment and economic growth impacts are discussed below:

Economic Impact of Warehouse Floorspace

To inform the economic assessment, the EIA defines a warehouse catchment which covers the Inner South Sydney Industrial Market. This catchment covers the NSW DPE Employment Land Development Monitor (**ELDM**) precincts of Mascot, Alexandria, Rosebery and Botany. The warehouse catchment faces supply constraints, high rent prices and low vacancy rates. Growing demands for industrial floorspace therefore put pressure on these market limitations, highlighting a need for more warehouse space in the area.

Urbis completed an audit of vacant industrial floorspace of at least 1,000m^2 within the warehouse catchment in October 2022. This audit determined that of the 1.44 million m^2 of industrial floorspace (only including stock of 1,000 m^2 and over) there was only around 20,800 m^{2}of vacant stock, which equates to a vacancy rate of 1.4%. Additionally, the warehouse catchment's warehouse pipeline only includes around 87,000m^2 of floorspace, with only around 40% considered 'firm' (construction or development approval phase) highlighting the critical supply of warehouse floor space. Additionally, the Inner South Sydney Market is experiencing increasing rental and sales prices which will continue to grow rapidly if higher density industrial development is not allowed.

The positioning of the site near Port Botany and Sydney Airport positions the potential future development as being strongly suited to the growing demand for warehouses as 'last mile logistics operations'. Demand has been at historically strong levels in recent years due to COVID-19 accelerating online retail spending growth. The annual share of online retail spending in Australia has grown from 7.5% in 2017 to 13.3% in 2022 and is expected to further increase to 20.5% by 2032. The site's locational positioning, and potential 166,878 m^2 of warehouse floorspace, is ideally placed to respond to this growing need in the freight and logistics sector.

In summary, the potential future 166,878m^2 of warehouse floorspace at the site will have a positive economic impact for the following reasons:

- Facilitates the retention and optimal use of the existing land supply;
- Addresses the current shortage of industrial floorspace;
- Helps combat the growing rental and sales prices which are currently growing at unsustainable levels; and
- Meets the growing demand for future warehousing and logistics floorspace in a highly suitable location.

Economic Impact of Office Premises

For the purposes of assessing the economic impact of office floorspace at the site, the EIA adopts Bayside LGA as the relevant office catchment. This office catchment includes the Mascot Commercial Precinct, which is one of the key employment hubs in the LGA which benefits from its designation as a Strategic Centre (in conjunction with Green Square) in addition to its proximity to the Sydney Airport an Port Botany.

The site is ideally located within Mascot and presents a key opportunity to help address the need for additional office floorspace. The indicative concept schemes provide for the delivery of 16,638m^2 of new office floorspace (comprising of 11,558m^2 of ancillary office floorspace and 5,080m^2 of commercial office floorspace) by 2030. This would represent 16% of the additional floorspace required in the office catchment by 2033.

The commercial and ancillary office space can be supported by the market and will have a positive economic impact due to:

- Helping to address 20% of the 84,704m^2 shortfall which is currently expected in 2030. As such, the additional office floorspace at the site will not have a negative impact on its competitors.
- As there is an expected shortfall, the current supply pipeline is not accommodating expected future demand, with a key reason being that land where commercial office floorspace is allowed is being favoured by developers for residential and mixed-use developments (with ground floor retail). As such, the potential floorspace at the site would ensure the delivery of office floorspace which is not currently being accommodated in other suitable land zones.
- Delivering ancillary office floorspace which is critical to the logistics businesses looking to locate within the office catchment.
- Improving the overall commercial office offer in the area and by delivering a critical mass of A-Grade commercial space (which is currently experiencing vacancy of 3.3%). The higher provision of high-quality commercial space in the office catchment will help attract new businesses into the area who are currently put off by the aging existing commercial stock.
- Creation of a vibrant workplace for employees which offers on-site retail and recreational amenities.

Retail Impact Analysis

The retail catchment considered for the Planning Proposal consists only of the workers and does not capture residents, as worker spending is likely to generate the significant majority of turnover for the potential future retail at the site. The economic impacts are considered in the context of the 1,299m^2 of food and beverage floorspace as provided for in the indicative concept schemes, as it is likely to comprise of café and restaurant floorspace which is currently not permitted at the site.

The retail impact assessment demonstrates that:

- In 2030, the total overall trading performance of the main existing competitors (excluding Airport Takeaway food -0.3% lower) will be 0.3% to 25.4% higher than 2023 levels, (in real, $2023 dollar terms) even when accounting for the proposed food and beverage retail at the site.
- In its first full year of trading (2030), the likely future development is forecast to draw $6.4 million from its main competitors, and $0.4 million from other retailers from other locations.
- The important factor to note however, is that when the $6.4 million impact is properly attributed between each of the main potential competitors, none of them are expected to experience a loss of turnover greater than 5.5% (from their 2030 trading level). These small impacts are considered as small and as such, the potential future retail at the site will not undermine the commercial viability of each of the defined precincts.
- The addition of retail on the site generates a higher willingness of workers within the retail catchment to spend more as they have more options to choose from (also known as supply induced spending). As such, the proposed retail at the site will have the positive effect of increasing the size of the overall spending market in the retail catchment as reflected in the increase in the spending per capita from 2023 to 2030.

Economic Impact of Recreation Facilities

The recreation catchment considered for the Planning Proposal consists of workers within a 10-minute walking catchment from the site and any workers likely to regularly use recreation facilities at the site including those from Sydney Airport. There is an established workforce of 44,814 workers within the recreation catchment (of which around 24,100 are workers within the primary recreation catchment) and the EIA finds there is currently a shortage of recreation facilities servicing workers. The indoor and outdoor recreation space will have a positive economic impact on the surrounding area for the following reasons:

- It will help address the current and projected shortfall of indoor sports courts, outdoor sports courts, and gyms which service workers.
- While the recreation facilities are primarily to service the recreation needs of workers, having additional sports courts is also beneficial to local residents, especially when considering the nearest outdoor sports courts is 2.7km from the site.

Other Positive Economic Benefits

The future development of the site in accordance with an FSR of 2:1, will facilitate the following economic benefits:

- Delivering 194 direct and 277 indirect construction jobs, and contributing $305.3 million in direct and indirect value added, to New South Wales over the four-year development phase.
- Delivering 1,225 direct jobs through the ongoing operation of the additional facilities on-site and a further 787 indirect jobs from flow-on effects.
- Directly contributing an average of $210.3 million in value added, and indirectly contributing a further $148.1 million in value added, to the New South Wales economy on an annual ongoing basis.
- Improving amenity for workers in Mascot, which will greatly improve the competitive positioning of the area in being able to attract new workers and businesses.

Social Impact

The plan amendment will have a positive social impact through the provision of additional permitted uses including commercial, retail and recreational facilities to support the industrial operations. The purpose of the additional permitted uses is to allow the delivery of property benefits to and support the health and wellbeing of local workers at the site and workers in the surrounding locality. The additional permitted uses allows for future development to provide a high-quality, retaining high-quality talent

The proposal could further contribute to positive social impact through high-quality building design including recreation space, pedestrian and active transport, bicycle parking and end of trip facilities for cyclists working in the building, universally accessible facilities, and lighting and signage for safe environments. These items would be addressed at the development application stage.

The Planning Proposal site is strategically located in an established industrial area and future development seeks to integrate a new warehouse or distribution centre within the existing context. The site is located away from residential areas and as such will not cause a disturbance to local residents.

The proposal has good alignment with its local and strategic context by providing employment opportunities for local residents.

The Planning Proposal will also have the following positive social impacts:

- Increase employment opportunities within close proximity to a number of high density residential developments and public transport services;
- Development of stronger connections with Country from the inclusion of public art and via aboriginal employment and procurement opportunities;
- The mixed-use development supports the integration of land use and transport planning;
- Enable improvements to the public domain with ground floor activation and publicly accessible recreation facilities;
- Improve the quality of the built form along Coward Street with the redevelopment of the site having to exhibit design excellence and commitment to ESD strategies and initiatives through the DA stage; and
- Increase pedestrian activity, which will create opportunities to utilise the principles of Crime Prevention Through Environmental Design.

The Planning Proposal will therefore have positive social and economic benefits for the broader community. It is considered that the proposal has addressed social and economic impacts and is in the public interest.

6.3.4. Section D – Infrastructure (Local, State and Commonwealth)

Q11. Is there adequate public infrastructure for the planning proposal?

Yes – there is adequate public infrastructure to service the increased demand generated by the additional floorspace permitted under the increased FSR of 2:1 and the complementary land uses under Schedule 1 as demonstrated in the technical deliverables submitted with the Draft Planning Proposal and summarised below:

- The site is located within an existing urban area with good access to public transport and other infrastructure in particular Mascot train station and Sydney domestic and international Airports.
- The site is well-located to optimise recent major investments and upgrades in road transport infrastructure which enhance the connectivity of the site and its associated competitive advantages, including the St Peters Interchange, M8 Motorway and theM4 and M5 Link Tunnels.
- The Transport Report confirms future development of the site can be suitably accommodated on the surrounding transport network subject to the required mitigation being implemented at the Coward and Kent Street intersection as described in **Section 4.3**.
- The preliminary Service Infrastructure Assessment (**Appendix Q**) confirms substantial infrastructure has been installed by the utility service operators and will provide adequate capacity to accommodate the proposed density.

Based on the above, it has been clearly demonstrated the Draft Planning Proposal is appropriate from an infrastructure perspective and will not require any significant upgrades which could impact upon Local, State or Commonwealth funding arrangements.

6.3.5. Section E – State and Commonwealth interests

Q11. What are the views of state and federal public authorities and government agencies consulted in order to inform the Gateway determination?

Bayside Council will undertake further consultation with State and Federal public authorities and government agencies following the lodgement of the Draft Planning Proposal. In the meantime, the proponent has undertaken preliminary and ongoing stakeholder consultation to ensure relevant parties have been made aware of the proposed plan amendments and been provided with the opportunity to provide feedback.

The Gateway Determination will confirm the public authorities to be consulted as part of the assessment process. Any issues raised will be incorporated into the final Planning Proposal and the LEP amendments.

6.4. Part 4: Mapping

The Planning Proposal seeks to amend the following BLEP 2021 Map:

- Floor Space Ratio Map Sheet FSR_008
- Additional Permitted Uses Map Sheet APU_008

The proposed amendments to the BLEP 2021 maps are provided as thumbnail images in **Section 6.2** and attached as **Appendix R**.

6.5. Part 5: Community Consultation

Section 3.34 of the EP&A Act requires the relevant planning authority to consult with the community in accordance with the gateway determination. It is expected the Planning Proposal will be publicly exhibited for 28 days and consultation will be undertaken with any relevant agencies and stakeholders.

6.6. Part 6: Project Timeline

Table 16 sets out the anticipated project timeline in accordance with the DPE guidelines. The key milestones and overall timeframe will be subject to further detailed discussions with Council and the DPE.

Table 16 Anticipated Project Timeline

Process	**Indicative Timeframe**
Planning Proposal submitted to Bayside Council	May 2023
Consideration of Planning Proposal by Bayside Council	January 2023 – March 2024
Gateway Determination	May 2024
Post Gateway	June 2024
Public exhibition & review of submissions	June 2024 – September 2024
Finalisation of Planning	October 2024 – November 2024
Gazettal of LEP amendment	9 months from issue of Gateway Determination

7. Disclaimer

This report is dated 12 May 2023 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd **(Urbis)** opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Perpetual Corporate Trust Limited as the trustee of the LMLP 1 and 2 Trust **(Instructing Party)** for the purpose of Planning Proposal **(Purpose)** and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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