

Bayside Local Planning Panel - Other Applications

12/12/2023

Item No	5.1
Subject	Planning Proposal - 263 & 273 Coward Street, Mascot
Report by	Ana Trifunovska, Senior Urban Planner
File	SF23/3262

Summary

On 12 May 2023, Council received a Planning Proposal Request (PP) for land at 263 and 273 Coward Street, Mascot, legally described as PT 100 and 101 in DP 1277278, and PT 3 in DP 230355.

The draft PP seeks to make amendments to the Bayside Local Environmental Plan 2021 (BLEP 2021) to:

- Increase the floor space ratio (FSR) standard under clause 4.4 from the current base control of 1.2:1 to a maximum 2:1;
- Remove the site from the current Additional Permitted Use provisions under Schedule 1 Clause 14, which allows for the site to be developed for any purposes where the purpose is related to the operation of Sydney (Kingsford Smith) Airport, and also allows the FSR control to be increased to 1.5:1 for these developments; and
- Insert a new Additional Permitted Use clause to allow for:
 - Office premises (to a maximum of 5% of total floorspace associated with any development); and
 - Restaurant and/or café uses.

The site is owned by Perpetual Corporate Trust Limited (Perpetual) who purchased the site and nearby land parcels from Qantas Airways Limited (Qantas) in late 2021. The site forms part of a consolidated land holding comprising a total of 137,565sqm of land across Mascot, which is in the planning phase for redevelopment. The draft PP applies to land within Perpetual's landholding known as 'QF1 / QF2' and comprises 94,565.6sqm. Development proposals are progressing for the remaining properties within the holding.

The draft PP has been found to be consistent with the strategic planning framework applying to the site. In particular, the draft PP supports the protection of employment lands and will facilitate the renewal of the site for ongoing employment purposes. The draft PP also responds to strategic directions at a State and local level regarding the alignment of infrastructure and land use, as it will leverage recent significant road transport infrastructure, and is also located within walking distance from rail transport at Mascot Station. The introduction of office uses to the site has been capped at 5% of total GFA, which will ensure that the strategic hierarchy of centres is not compromised.

The draft PP has also considered site-specific constraints and has demonstrated these can be addressed through a future development outcome. Key issues considered include:

- Visual impact and urban design, which has been considered through an Urban Design Report and Visual Impact Assessment;
- Flooding and Stormwater, which has been appropriately addressed through the submission of a Civil Engineering Report which confirms that the site is capable of suitably accommodating the proposed increase in density from a flooding perspective;
- Traffic, which has been considered through a Traffic Report which identifies that with the implementation of certain measures on nearby roads and intersections, these intersections will operate to a satisfactory level of operation;
- Economic Impact, which has been considered through an Economic Impact Assessment, showing significant economic benefits associated with the proposal.

Giving consideration to the above, it is considered that the draft PP has demonstrated both strategic and site-specific merit, and is recommended to be submitted to the Department of Planning and Environment for a Gateway determination.

The proponent has offered to enter into a planning agreement with Council, which will be considered separately by Council.

This assessment and report has been prepared by planning consultants, Patch Planning, engaged by Council.

Officer Recommendation

- 1 That the Bayside Local Planning Panel recommend to Council that, pursuant to s3.33 of the *Environmental Planning and Assessment act 1979* (EP&A Act), the draft Planning Proposal for land known as 263 and 273 Coward Street, Mascot be submitted to the Department of Planning and Environment for a Gateway Determination;
- 2 That, should a Gateway Determination be issued to proceed to public exhibition, a further report be presented to Council following the exhibition period addressing any submissions received throughout that process; and
- 3 That Bayside DCP 2022 be reviewed and updated concurrently with the draft PP post-Gateway, to ensure consistency with the concept scheme and the controls contained in these documents and the draft PP.

Background

Applicant: Urbis Pty Ltd on behalf of Perpetual Corporate Trust Limited

Owner LMLP 1 and 2 Trust

SUBJECT SITE AND SURROUNDING AREA

The site is known as 263 and 273 Coward Street, Mascot, legally described as PT 100 and 101 in DP 1277278, and PT 3 in DP 230355. The site is shown in **Figure 1** below.



Figure 1: Aerial photograph of site (Source: Urbis Planning Proposal)

The site is located at the western end of Coward Street with frontages to Coward Street to the north (380m boundary), adjoining warehouse development to the west (260m boundary), the Port Botany Rail Line to the south (400m boundary), and industrial / warehouse development to the east (250m boundary). The site is 94,565.6sqm in area.

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 a 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.

Although the site is relatively flat, there is a slight fall to the north-east with levels varying 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.

The site is fully serviced and is capable of adequately servicing proposed uplift.

The site is subject to a number of easements and restrictions including:

- 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.

The site is approximately 115 metres from the Alexandra Canal, which is a tidal waterway with direct connection to Botany Bay.

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.

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.

There are no known scenic and culturally important landscapes based on the existing development at the site. However, the site is highly visible from Qantas Drive and Sydney Airport.

SITE CONTEXT

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 137,565sqm across Mascot as shown in **Figure 2**.

The draft PP applies to the northern most lot identified in **Figure 1** (above) as 'QF1 / QF2' comprising 94,565.6sqm. Development proposals are underway for the remaining properties which include:

- A State Significant Development (SSD) application currently underway for QF3A and QF3B (SSD-49734709) for the construction and operation of a warehouse and distribution centre within a five storey building, including:
 - Approximately 31,266m² of total gross floor area (GFA), comprising:
 - 26,145m² of warehouse and distribution centre GFA
 - 5,121m² of ancillary office space GFA
 - Café tenancy within the King Street lobby

- Maximum building height of RL50.32 (45.09 metres)
- Generic internal fit-out of the warehouse and ancillary office components
- Operation 24 hours per day seven days a week
- Secretary's Environmental Assessment Requirements (SEARs) have been issued for a future SSD at QF4 (350 King Street, Mascot) which is anticipated to include:
 - The demolition of the existing hardstand area and construction of a warehouse and distribution with complementary office premises.
 - Building height of 44m (5 storeys) to roof ridgeline
 - Total GFA of 32,710m², broken down as follows:
 - Warehouse and Distribution: 26,310m²
 - Ancillary Office Premises 4,650m²
 - Standalone Office Premises: 1,450m²
 - Common Area: 1,250 m²



Figure 2: LOGOS consolidated landholdings in the precinct
(Source: Urbis Planning Proposal modified by Council)

The site is located within the Mascot West Employment Lands Precinct and close to major transport infrastructure, including Sydney Kingsford Smith Airport, WestConnex and the Sydney Gateway Road Project (see **Figure 3**). The Mascot West Employment Lands comprise warehouse and distribution, and manufacturing facilities. Notable land use activities surrounding the site include:

- Airgate Business Park to the west of the site, which is owned by Goodman and comprises multiple buildings such as the DHL Express Head Office, with other tenants including Woolworths and Toll Global Forwarding.
- Industrial zoned land to the north on the opposite side of Coward Street, which accommodates a variety of small-medium scale industrial style buildings.
- Immediately adjoining land to the east along Coward Street, which includes older-style industrial buildings accommodating manufacturing activities and other industrial and commercial buildings.
- The Port Botany freight line to the south.

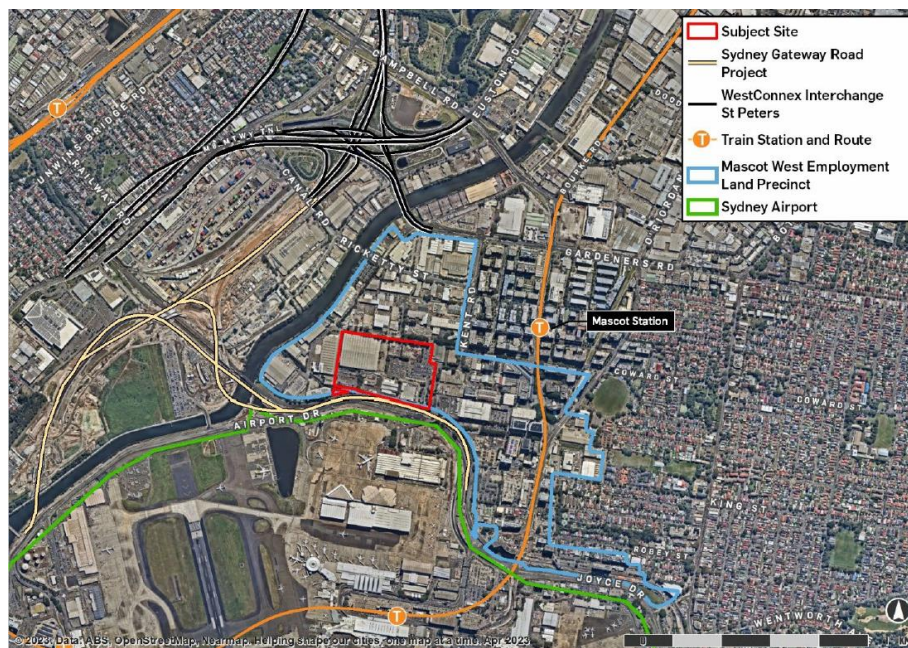


Figure 3: Site Context Map
(Source: Urbis Planning Proposal)



Figure 4: Site viewed from Coward Street looking south.
(Source: Google Maps)



Figure 5: Site viewed from Coward Street looking southeast.
(Source: Google Maps)



Figure 6: Adjoining land owned by Goodman to west of site on Coward Street
(Source: Google Maps)

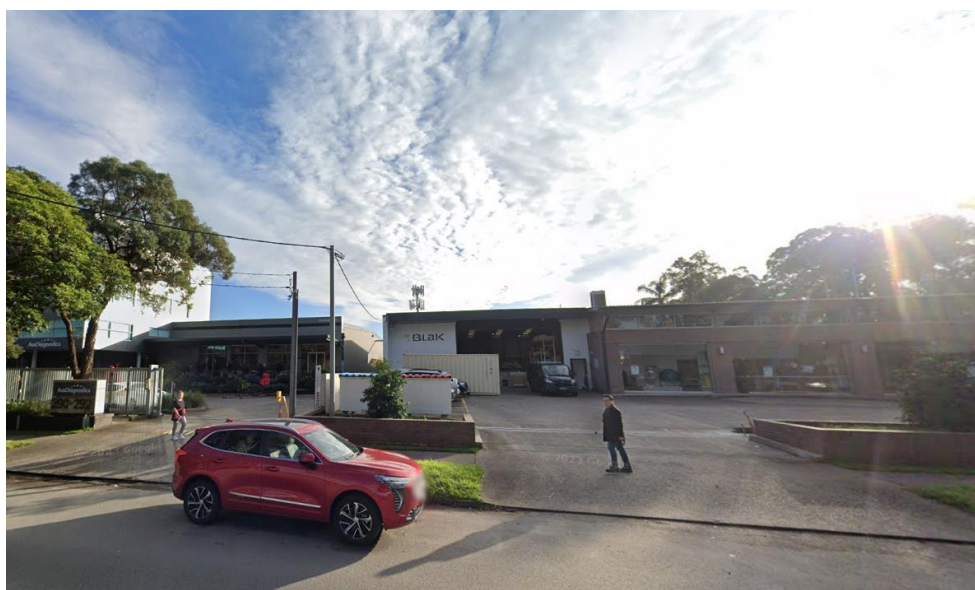


Figure 7: Industrial development to the north along Coward Street
(Source: Google Maps)

PLANNING PROPOSAL HISTORY

A history of the Planning Proposal Request is included in **Table 1** below:

Table 1: History and Context of the draft Planning Proposal

Date	Summary of Event
17 November 2021	Preliminary meeting to discuss Planning Proposal between Applicant and Council
31 May 2022	Technical meeting to discuss Planning Proposal between Applicant and Council
17 August 2022	Technical meeting to discuss required inputs to support a Planning Proposal between Applicant and Council
26 September 2022	Scoping Proposal Report submitted to Council, 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.
17 November 2022	Scoping Proposal meeting held between Applicant and Council
30 November 2022	Pre-lodgement Advice issued to Proponent
12 May 2023	Subject Planning Proposal submitted seeking to amend the Bayside LEP 2021
August - October 2023	Resolution of Requests for Information with applicant.
28 November 2023	Bayside Local Planning Panel meeting

DETAILS OF THE PLANNING PROPOSAL REQUEST

The Planning Proposal Request (**Attachment 1**) seeks amendments to the Bayside LEP 2021 as detailed in **Table 2** below.

Table 2: Proposed Planning Controls

Provision	Change
Zone	No change – maintain the E4 – General Industrial Zoning.

Provision	Change
Height of Buildings	No change – maintain the 44m control.
Floor Space Ratio	Increase from the current 1.2:1 (base) and 1.5:1 (where development is for a purpose listed in Schedule 1 Clause 14) to 2:1.
Schedule 1 Additional Permitted Use	<p>Remove the site from clause 14(1) in Schedule 1 and the associated pink shading and '10' notation on the Additional Permitted Uses Map and insert a new clause 45 that reads:</p> <p>45 Use of certain land at 263-273 and 273A Coward Street and 76-82 Kent Road, Mascot</p> <p>(1) This clause applies to land at 263-273 and 273A Coward Street and 76-82 Kent Road, Mascot, being PT 100 and 101 in DP 1277278, and PT 3 in DP 230355, and identified as "45" on the Additional Permitted Uses Map.</p> <p>(2) Development for the following purposes is permitted with development consent:</p> <p>(a) office premises</p> <p>(b) café or restaurant</p> <p>(3) Despite subclause (2), development consent must not be granted to development for the purposes of office premises where the gross floor area of the office premises exceeds 5% of the total gross floor area of the development.</p>

The PP is accompanied by the technical documentation listed below.

Table 3: List of supporting documentation to the draft Planning Proposal

PP Supporting Documentation	Prepared By	Report Attachment
Appendix A - Survey Plan	Land Partners	Attachment 2
Appendix B - Architectural Plans	Lacoste + Stevenson and Paddock Landscape Architects	Attachment 3
Appendix C - Urban Design Context Report	Lacoste + Stevenson and Paddock Landscape Architects	Attachment 4
Appendix D - Transport Report	Colston Budd Rogers Kafes (CBRK)	Attachment 5
Appendix E - Visual Impact Assessment	Paddock Landscape Architects	Attachment 6
Appendix F - Heritage Impact Statement	Urbis	Attachment 7
Appendix G - Aboriginal Objects Due Diligence	Urbis	Attachment 8
Appendix H - Landscape Concept Plan	Paddock Landscape Architects	Attachment 9
Appendix I - Economic Impact Assessment	Urbis	Attachment 10
Appendix J - Civil Engineering Report / Flood Impact Assessment	Costin Roe Consulting	Attachment 11
Appendix K - Arborist Report prepared	Canopy Consulting	Attachment 12
Appendix L - Preliminary Site Investigation	Reditus	Attachment 13
Appendix M - Detailed Site Investigation	ERM	Attachment 14
Appendix N - Acoustic Assessment (Aircraft Noise)	Renzo Tonin	Attachment 15
Appendix O - Aeronautical Impact Assessment	Landrum Brown	Attachment 16

PP Supporting Documentation	Prepared By	Report Attachment
Appendix P - Pipeline Hazard Analysis	Riskcon	Attachment 17
Appendix Q - Service Infrastructure Assessment	Land Partners	Attachment 18
Appendix R - LEP Mapping	Urbis	Attachment 19
Appendix S - ESD Report	E-Lab	Attachment 20
Appendix T - Curatorial Vision Framework	Cultural Capital	Attachment 21
Appendix U - Connecting with Country Framework	Cox Inall Ridgeway	Attachment 22
Appendix V - Solar Glint and Glare Assessment	Landrum Brown	Attachment 23
Draft Letter of Offer	Perpetual Corporate Trust Limited	Attachment 24

The intended outcome of the draft PP is to facilitate the redevelopment of the site for predominantly warehousing purposes, as outlined in the indicative design provided for in **Attachment 3**. The concept outcome 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 double/triple height 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;
- Ancillary floorspace including end-of-trip facilities and lobby areas for each building;
- 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 in **Table 4** below with extracted floorplans and elevations of the concept design shown in **Figure 8 - Figure 11**.

Table 4: Key numeric details of the concept scheme

Element	Indicative Development Outcome
Land Use	<ul style="list-style-type: none"> • Warehouse or Distribution Centre (with Ancillary Offices): 178,435m² • Office Premises: 8,047m² • Café / Restaurant / Take Away: 1,300m² • Neighbourhood Shop: 100m² • Ancillary Facilities (including Lobby and End of Trip Facilities): 1,250m²

Element	Indicative Development Outcome
Total GFA	<ul style="list-style-type: none"> QF1: 92,751 m² QF2: 96,380 m² Total (QF1 and QF2): 189,131m²
FSR	2:1
Building Height	44m



Figure 8: Lower Ground Floor Plan – Concept Scheme
(Source: Lacoste + Stevenson, 2023)

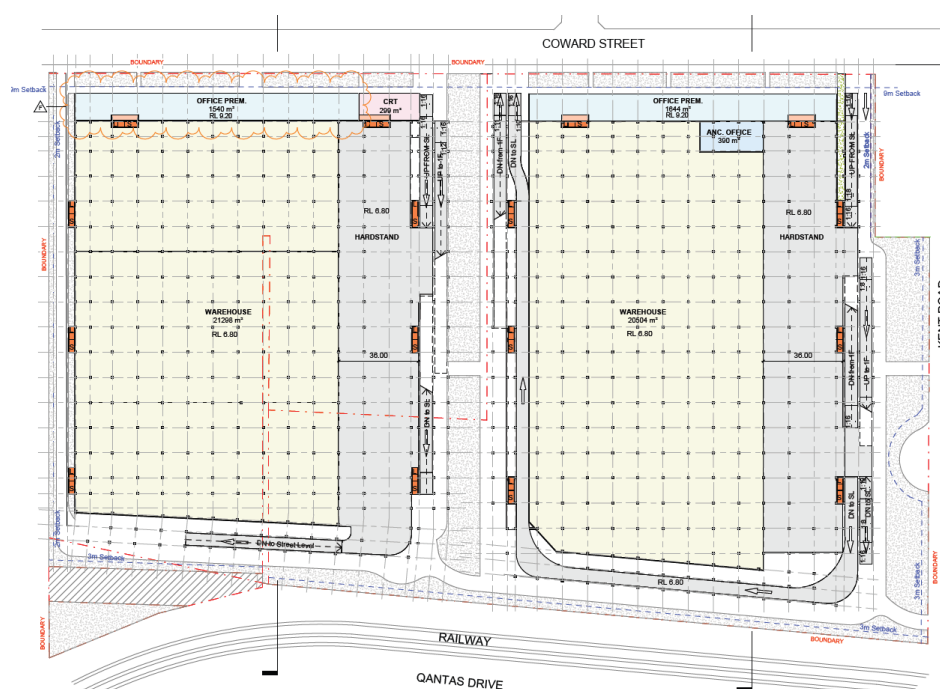


Figure 9: Ground Floor Plan – Concept Scheme
(Source: Lacoste + Stevenson, 2023)

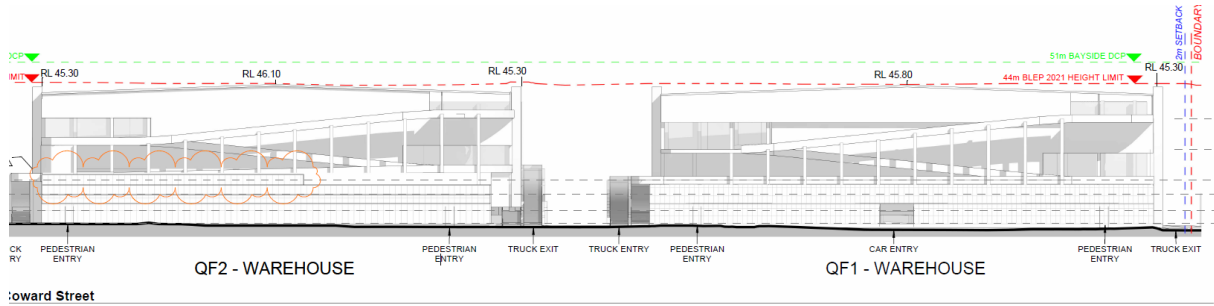


Figure 10: Coward Street Elevations – Concept Scheme
(Source: Lacoste + Stevenson, 2023)

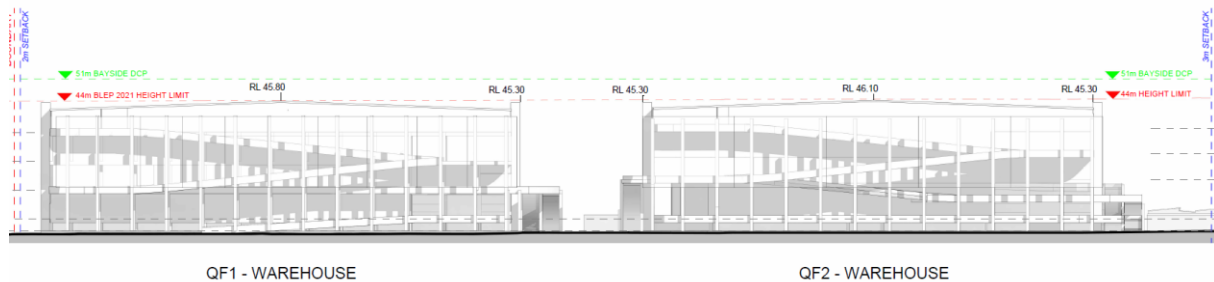


Figure 11: Qantas Drive Elevations – Concept Scheme
(Source: Lacoste + Stevenson, 2023)

ASSESSMENT OF PLANNING PROPOSAL REQUEST

ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979 (THE ACT)

The Department of Planning and Environment's (DPE) 'Local Environmental Plan Making Guideline' ('the LEP Making Guidelines') – issued under Division 3.4 of the Act - provides guidance and information on the process for preparing Planning Proposals. The assessment of the submitted draft PP has been undertaken in accordance with the latest version of this guide, dated August 2023.

The LEP Making Guidelines require an evaluation that:

- All section 9.1 Directions and SEPPs have been adequately addressed; and
- Relevant regional/district plans and LSPS (if relevant) have been addressed).

SECTION 9.1 DIRECTIONS

Section 9.1 Directions by the Minister are issued regarding the content of LEPs, to the extent that the content must achieve or give effect to particular principles, aims, objectives or policies set out in those directions. As assessment of the PP against the s9.1 Ministerial Directions is provided in **Table 5** below.

Table 5: Consistency with Section 9.1 Directions

Ministerial Direction	Comment	Consistency
Focus Area 1: Planning Systems		
1.1 Implementation of Regional Plans	<p>Objective: To give legal effect to the vision, land use strategy, goals, directions and actions contained in Regional Plans.</p> <p>Comment: The PP is largely consistent with the Greater Sydney Regional Plan. See Table 7 for further details.</p>	Yes
1.3 Approval and Referral Requirements	<p>Objective: To ensure that LEP provisions encourage the efficient and appropriate assessment of development.</p> <p>Comment: The PP is not designated development; and hence would not require the concurrence, consultation or referral to a Minister.</p>	Yes
1.4 Site Specific Provisions	<p>Objective: To discourage unnecessarily restrictive site specific planning controls.</p> <p>Comment: Currently, the site is subject to additional permitted uses under Schedule 1 Clause 14 of the BLEP 2021 which permits development for any purposes where that purpose is related to the use of Sydney (Kingsford Smith) Airport. The site is also subject to a mapped 'base' FSR of 1.2:1, but is permitted to achieve an FSR of 1.5:1 where development is related to the use of Sydney (Kingsford Smith) Airport.</p> <p>The draft PP seeks to simplify the existing site specific provisions applying to the site. It will amend the FSR Map to provide for a singular maximum FSR of 2:1 and remove the site from the current additional permitted use clause under Schedule 1 Clause 14.</p> <p>The draft PP does seek to insert a new clause into Schedule 1 to provide for a limited range of additional land uses including offices, restaurants, or cafes, applying solely to the site. Notwithstanding, the approach is consistent with the provisions of the direction as the new additional permitted uses will be clear, concise and will not undermine the integrity of the E4 zone.</p>	Yes
Focus area 1: Planning Systems – Place-based		
1.11 Implementation of Bayside West Precincts 2036 Plan	<p>Objective: To ensure development within the Bayside West Precincts (Arncliffe, Banksia and Cooks Cove) is consistent with the Bayside West Precincts 2036 Plan.</p> <p>Comment: The PP does not include land within the Bayside West Precincts in Arncliffe, Banksia or Cooks Cove.</p>	N/A
Focus area 3: Biodiversity and Conservation		
3.2 Heritage Conservation	<p>Objective: To conserve items, areas, objects and places of environmental heritage significance and indigenous heritage significance.</p> <p>Comment: The draft PP is supported by a HIS prepared by Urbis that assesses the potential heritage impact of the proposed underlying planning control amendments, and gives consideration to the potential future built-form it will facilitate. The HIS determined that <i>"overall, the subject site is not considered to demonstrate any particular heritage value"</i> and that the PP was acceptable from a heritage perspective for the following reasons:</p> <ul style="list-style-type: none"> - The site does not meet the threshold for heritage listing and has no identified heritage significance; - None of the existing heritage items in the vicinity of the site will be altered or impacted; - The site is considerably visually separated from the Sydney Airport heritage items by a two-lane roadway (Qantas Drive), freight railway and elevated roadways associated with The Gateway project under construction. - The subject site is well separated from Alexandra Canal and has no visual connection to the heritage item given the intervening built form on neighbouring sites. - The proposed changes to the underlying FSR provisions will not result 	Yes

Ministerial Direction	Comment	Consistency
	<p>in an inappropriate built form response in the future, and will instead provide for an industrial/logistical development consistent with the character of the area, and necessary for the ongoing support of operations for the heritage listed Sydney Airport.</p> <p>The PP is also supported by an Aboriginal Objects Due Diligence Assessment prepared by Urbis that found:</p> <ul style="list-style-type: none"> - 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. 	
3.7 Public Bushland	<p>Objective: To protect bushland in urban areas, including rehabilitated areas, and ensure the ecological viability of the bushland.</p> <p>Comment: The Arborist Report prepared by Canopy Consulting demonstrates that the proposal is not inconsistent with the objectives of Direction 3.7. An Arboricultural Impact Assessment will be submitted with any future DA based on the detailed design and potential impacts to tree population.</p>	Yes
Focus area 4: Resilience and Hazards		
4.1 Flooding	<p>Objective: To ensure that:</p> <ol style="list-style-type: none"> Development of flood prone land is consistent with the NSW Government's Flood Prone Land Policy and the principles of the Floodplain Development Manual 2005, and The provisions of an LEP that apply to flood prone land are commensurate with flood behaviour and includes consideration of the potential flood impacts both on and off the subject land. <p>Comment:</p> <p>The site is identified as being located within a flood area. The PP's consistency with the details of Direction 4.1 are summarised as:</p> <p>Direction 4.1(1) – Consistent, as discussed in 'Major Issues' section of this report.</p> <p>Direction 4.1(2) – Consistent, as it will not alter the underlying employment zoning of the site.</p> <p>Direction 4.1(3) – Consistent, see Major Issues section for more detail.</p> <p>Direction 4.1(4) – Consistent, see Major Issues section for more detail.</p> <p>Direction 4.1(5) – Consistent, the flood planning area is consistent with the <i>Mascot, Rosebery and Eastlakes Flood Study</i> (document ref: 113077:190320) completed by WMAwater on behalf of the City of Botany Bay in March 2019.</p>	<p>Yes – adequately justified.</p> <p>Refer to discussion regarding flooding further within this report.</p>
4.4 Remediation of Contaminated Land	<p>Objective: To reduce the risk of harm to human health and the environment by ensuring that contamination and remediation are considered by Planning Proposal Authorities.</p>	Yes

Ministerial Direction	Comment	Consistency
	<p>Comment: The Planning Proposal does not seek to change the E4 General Industrial zone.</p> <p>The technical deliverables provided with the Draft Planning Proposal, including the original investigations and verification letters, do indicate the presence of some contaminants of concern. However, the Due Diligence Assessment (Attachment 14) states that the environmental quality of soil and groundwater at the site does not preclude it for continued commercial/industrial land uses, subject to appropriate management of identified impacts. It is recommended that future works be undertaken in accordance with the existing Environment Management Plan that applies to the site, with a new Environmental Management Plan, and/or Remedial Action Plan, and a Construction Environmental Management Plan (CEMP) to be developed to outline future requirements for remediation and construction works which involve excavation.</p>	
4.5 Acid Sulfate Soils	<p>Objective: To avoid significant adverse environmental impacts from the use of land that has a probability of containing Acid Sulfate Soils.</p> <p>Comment: The site is categorised as Soil Class 2 Acid Sulfate Soils (ASS). ASS can be appropriately managed through the preparation of an Acid Sulfate Soils Management Plan as part of any future DA.</p>	Yes
Focus area 5: Transport and Infrastructure		
5.1 Integrating Land Use and Transport	<p>Objective: To ensure that urban structures, building forms, land use locations, development designs, subdivision and street layouts achieve the following planning objectives:</p> <ul style="list-style-type: none"> (a) Improving access to housing, jobs and services by walking, cycling and public transport, and (b) Increasing the choice of available transport and reducing dependence on cars, and (c) Reducing travel demand including the number of trips generated by development and the distances travelled, especially by car, and (d) Supporting the efficient and viable operation of public transport services, and (e) Providing for the efficient movement of freight. <p>Comment:</p> <p>The PP is consistent with Direction 5.1 as:</p> <ul style="list-style-type: none"> - The additional industrial floorspace will provide for increased employment opportunities within the Bayside LGA; - The increased employment opportunities will be delivered in an accessible location well serviced by Mascot Town Centre and local bus routes which will support the 30-minute city; and - The PP seeks to increase the amount of industrial floorspace available for the purposes of freight and logistics in a location that is proximate to the international trade gateways of Port Botany and Sydney Airport. 	Yes
5.3 Development Near Regulated Airports and Defence Airfields	<p>Objectives: Include to:</p> <ul style="list-style-type: none"> (a) Ensure the effective and safe operation of regulated airports and defence airfields; (b) Ensure that their operation is not compromised by development that constitutes an obstruction, hazard, or potential hazard to aircraft flying in the vicinity; and (c) Ensure development, if situated on noise sensitive land, incorporates appropriate mitigation measures so that the development is not adversely affected by aircraft noise. <p>Comment:</p> <p>The site sits largely within the 25 - 30 ANEF contour. Sydney Airport is south of Qantas Drive. The proponent has previously engaged with representatives</p>	Yes

Ministerial Direction	Comment	Consistency
	<p>of the airport operator (Sydney Airport Corporation Limited (SACL) to discuss the Draft Planning Proposal and have committed to ongoing engagement.</p> <p>The Aeronautical Impact Assessment (AIA) (Attachment 16) 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 ANEF zones.</p> <p>The AIA recommends further assessment and consultation be undertaken at the DA stage, including the proposed lighting and use of temporary craneage during construction.</p> <p>A Solar Glint and Glare Assessment (Attachment 23) has been provided with respect to the potential for glare results as an outcome of proposed photovoltaic panels. This has concluded that there is no aviation reason that the solar panels should not be permitted.</p>	
Focus area 7: Industry and Employment		
7.1 Employment Zones	<p>Objectives:</p> <p>To:</p> <ul style="list-style-type: none"> (a) Encourage employment growth in suitable locations, (b) Protect employment land in employment zones, and (c) Support the viability of identified centres. <p>Comment:</p> <p>The draft PP proposes to introduce office uses as a permitted land use, limited to a total of 5% of the overall floorspace of any development. It is critical that this limit is imposed and maintained in order to protect the future industrial land from being developed as a higher order use (office) in totality which would theoretically undermine the viability of the surrounding industrial land, undermine the established office centres hierarchy and would detract from the viability of the Mascot Town Centre as a retail centre.</p> <p>The PP is consistent with 7.1 in that the PP will give effect to objectives of the direction, specifically by protecting existing employment land and encouraging employment growth in a suitable location (E4 land).</p> <p>The PP in its current form is consistent with Direction 7.1 and is therefore supportable (with the abovementioned change). Specifically, the office premises use limitation of 5% of GFA will ensure the maintenance of: viability of the surrounding industrial land, retention of the established office centres hierarchy and protection of the viability of the Mascot Town Centre as a retail centre.</p>	Yes

STATE ENVIRONMENTAL PLANNING POLICIES (SEPPS)

An assessment of the draft PP against relevant SEPPs is provided in **Table 6**, below.

Table 6: *Relevant State Environmental Planning Policies*

SEPP	Comment	Consistency
SEPP (Biodiversity and Conservation) 2021	The Arborist Report (Attachment 12) 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 findings of the report will be refined and applied to the design process associated with any future development application.	Yes.

SEPP	Comment	Consistency
	Any future development application will need to have regard to Part 2.2 of the SEPP, and the draft PP does not contain any provisions that would inhibit the application of the SEPP.	
SEPP (Resilience and Hazards) 2021	<p>Clause 4.6 of SEPP (Resilience and Hazards) 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 use used for that purpose.</p> <p>The investigations submitted alongside the draft PP at Attachment 13 and Attachment 14 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.</p>	Yes.
SEPP (Sustainable Buildings) 2021	<p>SEPP (Sustainable Buildings) 2022 encourages more sustainable building designs, and sets sustainability standards for non-residential development. Chapter 3 of the SEPP outlines the standards for non-residential development to minimise waste and energy consumption.</p> <p>An ESD report has been prepared by E-Lab Consulting (Attachment 20) and submitted alongside the draft PP. The ESD report 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.</p>	Yes.
SEPP (Transport and Infrastructure) 2021	<p>SEPP (Transport and Infrastructure) 2021 provides a consistent planning regime for infrastructure and the provision of services across NSW, as well as requirements for consultation with public authorities during the assessment process.</p> <p>The future DA associated with the indicative concept accompanying the draft PP would need to be assessed in accordance with:</p> <ul style="list-style-type: none"> • Clause 2.77 Development adjacent to pipeline corridors • Clause 2.98 Development adjacent to rail corridors • Clause 2.122 Traffic-generating development <p>A Pipeline Risk Assessment was prepared by Riskcon to support the draft PP (Attachment 17), to establish whether the additional floor space proposed 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 PP, however, consultation with Jemena will be required at the DA stage.</p> <p>Further consultation may be required with the relevant road and rail transport authorities at the DA stage, depending on the final detailed design, with respect to potential impacts on the Port Botany rail line and the local road network.</p>	Yes.

There are no other SEPPs relevant to the draft Planning Proposal.

STRATEGIC PLANNING FRAMEWORK – REGIONAL AND DISTRICT PLANS

Regional and District Plans, and local strategies, include outcomes and specific actions for a range of different matters including housing and employment targets, and identify regionally important natural resources, transport networks and social infrastructure.

Greater Sydney Regional Plan – A Metropolis of Three Cities (GSRP)

An assessment of the draft Planning Proposal's consistency with the strategic planning framework is provided in **Table 7**, below.

Table 7: Consistency with GSRP

Direction and Objective	Comment	Consistency
Direction 1: A city supported by infrastructure		
Objective 1: Infrastructure supports the three cities	<p>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).</p> <p>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.</p> <p>The plan amendments seek to leverage this significant government investment and deliver additional floor space capacity in an appropriate and accessible location.</p>	Yes.
Objective 3: Infrastructure adapts to meet future needs	The proposed plan amendment will contribute to meeting anticipated demand for additional warehouse or distribution centre 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.	Yes.
Direction 6: A well-connected city		
Objective 14: A Metropolis of Three Cities – integrated land use and transport creates walkable and 30-minute cities	The proposed plan amendment seeks to deliver additional floorspace and create increased job opportunities within walking distance of Mascot railway station. This will help to realise the 30-minute city.	Yes.
Objective 15: The Eastern, GOP and Western Economic Corridors are better connected and more competitive	<p>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.</p> <p>The proposed plan amendment seeks to deliver additional floorspace and create increased job opportunities within walking distance of Mascot railway station.</p>	Yes.
Objective 16: Freight and logistics network is competitive and efficient	<p>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.</p> <p>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.</p>	Yes.
Direction 7: Jobs and skills for the city		
Objective 18: Harbour CBD is stronger and more competitive	The proposed plan amendment will contribute to meeting anticipated demand for additional warehouse or distribution centre floor space close to Sydney Airport, Port Botany and the Sydney CBD and time sensitive and last mile distribution across the Harbour CBD ensuring its ongoing economic strength and competitiveness.	Yes.
Objective 23: Industrial and urban services land is	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	Yes.

Direction and Objective	Comment	Consistency
planned, retained and managed	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. The Additional Permitted Uses proposed in the PP would permit office premises to be developed at the site. However, these are proposed to be limited to 5% of overall GFA and therefore not be at risk of undermining this objective.	
Direction 8: A city in its landscape		
Objective 25: The coast and waterways are protected and healthier	The Draft PP has considered the impacts on stormwater runoff to the Alexandra Canal and eventually Botany Bay through the submission of a Civil Engineering Report / Flood Impact Assessment.	Yes
Objective 30: Urban tree canopy cover is increased	The future development will seek to retain and protect existing significant trees along the northern and southern boundaries and supplement with additional tree planting and landscaping to improve the amenity of the site, to increase the existing urban tree canopy coverage.	Yes
Direction 9: An efficient city		
Objective 33: A low-carbon city contributes to net-zero emissions by 2050 and mitigates climate change	The Draft PP 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.	Yes.
Objective 34: Energy and water flows are captured, used and re-used	The Draft PP provides strategies and commitments which will be implemented at the DA stage.	Yes.
Direction 10: A resilient city		
Objective 36: People and places adapt to climate change and future shocks and stresses	The Draft PP 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.	Yes.
Objective 37: Exposure to natural and urban hazards is reduced	Flood Assessment has been undertaken as part of the Civil Engineering Report prepared by Costin Roe to assess the effect of flooding of the site deriving from future 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.	Yes.
Objective 38: Heatwaves and extreme heat are managed	The Draft PP 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.	Yes.

Eastern City District Plan (ECDP)

The draft PP's consistency with the priorities in the ECDP are discussed in further detail in Table 8 below.

Table 8: Consistency with the Eastern City District Plan

Priority		Consistency / Comment
Infrastructure and Collaboration		
E1	Planning for a city supported by infrastructure	Yes. The site is well-located to recently upgraded road transport infrastructure such as

Priority		Consistency / Comment
		the St Peters Interchange, M8 Motorway and the future M4 and M5 Link Tunnels.
Productivity		
E9	Growing international trade gateways	Yes. The site is located near to the international trade gateways of Sydney Airport and Port Botany. Increased FSR will leverage the competitive advantages and efficiencies of the proximity to these gateways.
E10	Delivering integrated land use and transport planning and a 30-minute city	Yes. The site provides additional employment floorspace within 10-minutes (walk) of Mascot Train Station.
E12	Retaining and managing industrial and urban services land	Yes. The proposed FSR increase would supply additional industrial floor space capacity to respond to strong demand within the locality. This will support the retention and management of industrial areas within the Eastern City District.

STRATEGIC PLANNING FRAMEWORK – LOCAL

Bayside Local Strategic Planning Statement (LSPS)

Council's LSPS sets the 20-year vision for the Bayside LGA, including identifying the special character and values to be preserved and how change will be managed. The LSPS explains how Council is implementing the planning priorities and actions in the relevant district plan, in conjunction with its Community Strategic Plan.

The draft PP compares with the following relevant Planning Priorities identified in the Bayside LSPS, as noted in **Table 9**, below:

Table 9: Bayside LSPS

Priority		Consistency / Comment
Infrastructure and Collaboration		
B1	Align land use planning and transport infrastructure planning to support the growth of Bayside	Yes. The site leverages significant recent upgrades to road infrastructure, including WestConnex and the Sydney Gateway.
B3	Working through collaboration	Yes. The draft PP has been submitted following ongoing consultation with a range of stakeholders including Council, Transport for NSW, Australian Rail Track Corporation, Sydney Airport Corporation, and State and Federal Parliament members. Feedback from the stakeholder consultation processes has been incorporated into the draft PP and supporting technical studies.
Productivity		
B12	Delivering an integrated land use and a 30-minute city.	Yes. The site provides additional employment floorspace within 10-minutes (walk) of Mascot Train Station.
B13	Contribute to a stronger and more competitive Harbour CBD	Yes. The proposed increase to the FSR control will accommodate additional industrial zoned floor space to support the Eastern Economic Corridor and assist in the revitalisation of aged industrial facilities to meet current operational requirements.

Priority		Consistency / Comment
B14	Protect and grow the international trade gateways.	Yes. The site is located near to the international trade gateways of Sydney Airport and Port Botany. Increased FSR will leverage the competitive advantages and efficiencies of the proximity to these gateways.
B15	Growing investment, business opportunities and jobs in Bayside's strategic centres and centres.	Yes. Mascot-Green Square is identified as a strategic centre which is forecast to grow to 75,000-80,000 jobs by 2036. The draft PP 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.
B17	Retain and manage industrial and urban services lands.	Yes. The proposed FSR increase would supply additional industrial floor space capacity to respond to strong demand within the locality. This will support the retention and management of industrial areas within the Eastern City District.
B18	Support the growth of targeted industry sectors.	Yes. The proposed increase in FSR will facilitate the revitalisation of the site to support technological advancements in the manufacturing, freight and logistics sector. The site is strategically located to cater for growth industries such as e-commerce, and time sensitive and last mile delivery services.
Sustainability		
B20	Increase urban tree canopy cover and enhance green grid connections.	Yes. The future development will seek to retain and protect existing significant trees along the northern and southern boundaries and supplement with additional tree planting and landscaping to improve the amenity of the site, to increase the existing urban tree canopy coverage.
B23	Reduce carbon emissions through improved management of energy, water and waste.	Yes. The ESD report (Attachment 20) accompanying the draft PP 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.
B24	Reduce community risk to urban and natural hazards and improve the community's resilience to social, environmental and economic shocks and stressors.	Yes. The Flood Assessment report accompanying the draft PP (Attachment 11) confirms there is negligible flooding impact on upstream, downstream and/or adjoining sites as a result of the proposed development outcome.

Bayside Community Strategic Plan 2032

An assessment of the draft PP's consistency with the following relevant themes and strategic directions contained in the Bayside Community Strategic Plan 2032 is provided in **Table 10** below.

Table 10: Bayside Community Strategic Plan 2032

Community Outcome	Strategies	Consistency / Comment
Theme 1 – In 2032 Bayside will be a Vibrant Place		
Bayside's transport system works	Promote Bayside as a 30-minute City where residents do not have to travel for more than 30 minutes to work	Yes. The site provides additional employment floorspace within 10-minutes (walk) of Mascot Train Station.

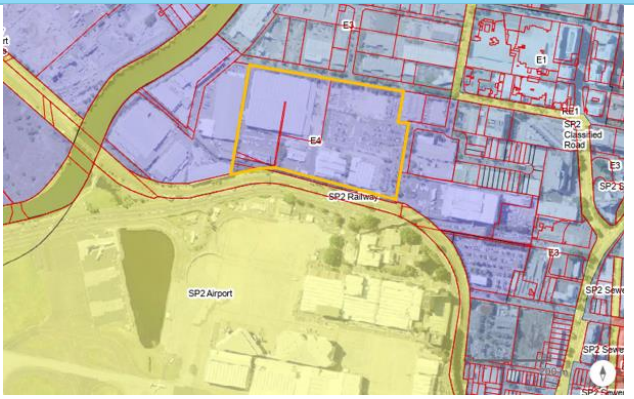
Theme 3 – In 2032 Bayside will be green, resilient and sustainable		
Bayside's use of renewable energy is increasing	Promote the use of renewable energy through community education	Yes. The ESD report (Attachment 20) accompanying the draft PP provides ESD strategies and commitments which will be implemented at the DA stage to deliver an affordable and sustainable outcome for the project during the design, construction and operational phases.
Bayside's waterways and green corridors are regenerated and preserved	Increase Bayside's tree canopy	Yes. The future development will seek to retain and protect existing significant trees along the northern and southern boundaries and supplement with additional tree planting and landscaping to improve the amenity of the site, to increase the existing urban tree canopy coverage.
	Respect, manage and protect the natural environment and biodiversity	Yes. The draft PP has considered the impacts on stormwater runoff to the Alexandra Canal and eventually Botany Bay through the submission of a Civil Engineering Report / Flood Impact Assessment (Attachment J).
Theme 4 - In 2032 Bayside will be a prosperous community		
Bayside generates diverse local employment and business opportunities	Support innovative and new and emerging businesses to locate in Bayside	Yes. The proposed FSR increase amendment will facilitate the renewal and redevelopment of the site by delivering additional capacity for industrial floor space.
Bayside recognises and leverages opportunities for economic development	Take advantage of Bayside's position as an international hub for transport and logistics related business	Yes. The proposal optimises the development potential of zoned industrial land in a key strategic location which benefits from recent State investment in road 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.
	Preserve industrial lands and employment lands and partner with major employers to support local jobs	Yes. The proposed FSR increase would support the retention and revitalisation of industrial lands within the Bayside LGA, promoting more local jobs.

Bayside Local Environmental Plan 2021 (BLEP 2021)



An assessment of the draft PP and its indicative concept scheme against the key provisions of the BLEP 2021 is provided in **Table 11** below.

Table 11: BLEP 2021

Control	Objective	Consistency
E4 General Industrial Zoning	<ul style="list-style-type: none"> To provide a range of industrial, warehouse, 	The planning proposal does not intend to rezone the land from its current E4 – General Industrial zoning under BLEP 2021.

Control	Objective	Consistency
	<p>logistics and related land uses.</p> <ul style="list-style-type: none"> To ensure the efficient and viable use of land for industrial uses. To minimise any adverse effect of industry on other land uses. To encourage employment opportunities. To enable limited non-industrial land uses that provide facilities and services to meet the needs of businesses and workers. To ensure adequate protection of industrial land and uses, in line with the strategic direction to retain and manage industrial land and land for urban services. 	 <p>Figure 12: Current land zoning applying to site. (Source: BLEP 2021 extracted from NSW Planning Portal)</p> <p>The concept design for the site is to provide a multi-level warehouse and distribution centre development, including two separate buildings across the QF1 and QF2 sites. In general, this includes:</p> <ul style="list-style-type: none"> 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. Ancillary floorspace including end-of-trip facilities and lobby areas for each building. 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. <p>Office premises and café or restaurant uses are prohibited in the E4 Zone under BLEP 2021. These aspects of the concept design are proposed to be permitted through the introduction of an Additional Permitted Use Clause.</p> <p>The draft PP is otherwise consistent with the objectives of the E4 – General Industrial Zone as it will facilitate additional warehousing and logistics development on the site, encourages employment opportunities, limits non-industrial land use outcomes, and protects the land for its intended purpose under the zoning.</p>
Clause 2.5 Additional permitted uses for particular land	-	<p>The draft PP seeks to remove the existing Additional Permitted Use (APU) which applies to the site under Clause 2.5 and introduce a revised APU in its place.</p> <p>The existing APU under Schedule 1 Clause 14 that applies to the site (and several others) is provided below:</p> <p><i>(2) Development is permitted with development consent—</i></p>

Control	Objective	Consistency
		<p>(a) for any of the following purposes, but only if the purpose relates to the use of Sydney (Kingsford Smith) Airport—</p> <p>(i) commercial premises,</p> <p>(ii) function centres,</p> <p>(iii) information and education facilities,</p> <p>(iv) passenger transport facilities,</p> <p>(v) tourist and visitor accommodation, or</p> <p>(b) for the purpose of any other building or place used only for purposes that relate to the use of Sydney (Kingsford Smith) Airport.</p> <p>(3) Without limiting subclause (2), development is permitted with development consent for the purpose of a building or place used for the provision of any of the following services—</p> <p>(a) services related to any of the following uses carried out at Sydney (Kingsford Smith) Airport—</p> <p>(i) the assembly, storage or land transport of air freight,</p> <p>(ii) the accommodation, or transportation by air or land, of air passengers or air crew,</p> <p>(iii) the storage, operation, maintenance or repair of aircraft or aircraft components,</p> <p>(iv) the administrative functions associated with the airport, such as airport management and security,</p> <p>(v) the functions of government departments and authorities related to air passengers and air freight,</p> <p>(b) 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.</p> <p>The subject site is proposed to be removed from the list of sites to which this APU applies.</p> <p>The proposed new APU, which would become Schedule 1 Clause 45, is provided below:</p> <p>45 Use of certain land at 263 & 273 Coward Street, Mascot</p> <p>(1) This clause applies to land at 263 & 273 Coward Street, Mascot, being PT 100 and 101 in DP 1277278, and PT 3 in DP 230355, and identified as “45” on the Additional Permitted Uses Map.</p> <p>(2) Development for the following purposes is permitted with development consent:</p> <p>(a) office premises</p> <p>(b) café or restaurant</p> <p>(3) Despite subclause (2), development consent must not be granted to development for the purposes of office premises where the gross floor area of the office premises exceeds 5% of the total gross floor area of the development.</p> <p>The proposed APU is considered appropriate as it protects the site for its intended outcomes under the E4 – General Industrial Zone while allowing additional supporting uses in the form of offices and restaurants /</p>

Control	Objective	Consistency
		cafes which would provide a high amenity working environment.
Clause 4.3 Height of Buildings	<p>(a) to ensure that building height is consistent with the desired future character of an area,</p> <p>(b) to minimise visual impact of new development, disruption of views, loss of privacy and loss of solar access to existing development,</p> <p>(c) to nominate heights that will provide an appropriate transition in built form and land use intensity.</p>	<p>The draft PP does not seek to make any changes to the Height of Buildings (HOB) provision that applies under clause 4.3 of BLEP 2021, which is 44m as shown in the below figure.</p>  <p>Figure 13: Current HOB Control applying to site (Source: BLEP 2021 extracted from NSW Planning Portal)</p> <p>The draft PP is supported by an indicative concept design which demonstrates that the proposed FSR of 2:1 can be accommodated with the current maximum HOB control of 44m.</p>
Clause 4.4 Floor Space Ratio	<p>(a) to establish standards for the maximum development density and intensity of land use,</p> <p>(b) to ensure buildings are compatible with the bulk and scale of the existing and desired future character of the locality,</p> <p>(c) to minimise adverse environmental effects on the use or enjoyment of adjoining properties and the public domain,</p> <p>(d) to maintain an appropriate visual relationship between new development and the existing character of areas or locations that are not undergoing or likely to undergo a substantial transformation,</p> <p>(e) to ensure buildings do not adversely affect the streetscape, skyline or landscape when viewed from adjoining roads and other public places such as parks and community facilities.</p>	<p>The applicable floor space ratio (FSR) control on the subject site is:</p> <ul style="list-style-type: none"> A 1.2:1 base FSR as mapped below; or As the site is mapped in 'Area 3' on the FSR Map, a 1.5:1 FSR applies for buildings that are that is permitted under Schedule 1 Clause 14 (described above in this table under Clause 2.5 'Additional permitted uses for particular land'). <p>In effect, the current Clause 4.4 essentially provides an incentive 0.3:1 FSR for developing airport-related uses on the site.</p>  <p>Figure 14: Current FSR Control applying to site. (Source: BLEP 2021 extracted from NSW Planning Portal)</p> <p>The draft PP seeks to remove the site from Area 3 and establish a singular maximum FSR control of 2:1.</p>

Control	Objective	Consistency
		<p>The effects of the proposed increase have been considered and are considered appropriate, and include the following which are discussed further within this report:</p> <ul style="list-style-type: none"> • Urban Design and Visual Impact • Flooding • Stormwater Management • Traffic • Economic Impact
Clause 5.10 Heritage Conservation	<p>(a) to conserve the environmental heritage of Bayside,</p> <p>(b) to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,</p> <p>(c) to conserve archaeological sites,</p> <p>(d) to conserve Aboriginal objects and Aboriginal places of heritage significance.</p>	<p>The site is not identified as a local heritage item or located within a heritage conservation area, however, there are several listed items in the locality including:</p> <ul style="list-style-type: none"> • 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. <p>A Heritage Impact Statement (HIS) and an Aboriginal Objects Due Diligence Assessment (AODD) were prepared by Urbis to assess the potential impacts associated with the draft PP.</p> <p>The HIS confirms the site is visually separated from the Sydney Airport heritage items and the Alexandra Canal and that the indicative concept design utilising the proposed FSR of 2:1 will not result in an inappropriate built form and will be 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.</p> <p>The AODD concludes that, 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, no further archaeological assessment of the subject area is required at this stage.</p> <p>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.</p>
5.21 Flood Planning	<p>The consent authority must not grant development consent to land the consent authority considers to be within the flood planning area unless the consent authority is satisfied the development has suitably resolved flood issues.</p>	<p>The site is identified as being located within a flood area. A Civil Engineering Report has been prepared by Costin Roe Consulting to assess the potential impacts associated with the draft Planning Proposal.</p> <p>The draft Planning Proposal has demonstrated that the site is capable of suitably accommodating the proposed increase in density from a flooding perspective and will not result in significant flood impacts to other properties.</p> <p>It is recommended that flooding is addressed in a future site-specific DCP for the site to be prepared post-</p>

Control	Objective	Consistency
		Gateway. A detailed Flood Impact Assessment would also be required in support of any future Development Application of the site.
6.3 Stormwater and Water Sensitive Urban Design	Before granting development consent, the consent authority must be satisfied the development will satisfy the relevant stormwater provisions and water sensitive urban design principles.	<p>The ACER demonstrates that future development of the site is capable of meeting the stormwater and water sensitive urban design (WSUD) requirements of BLEP 2021.</p> <p>No further investigations at this stage are required, however it is recommended that stormwater and WSUD requirements are included as part of a future site-specific DCP for the site, to be prepared post-Gateway. A detailed stormwater management strategy would be required in support of any future Development Application of the site.</p>
6.7 Airspace Operations	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.	<p>The Aeronautical Impact Assessment submitted alongside the draft PP (Attachment 16) indicates the likely future buildings will not impact on the airspace operations. 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.</p> <p>Further, a Glint and Glare Assessment (Attachment 23) has been prepared which demonstrates the solar panels proposed for the roof-top can be accommodated without posing a risk to airspace operations, subject to the implementation of recommended mitigation measures including installation of a protective mesh, netting and/or spikes to prevent bird roosting and attractant.</p>
6.8 Development in Areas Subject to Aircraft Noise	In deciding whether to grant development consent, the consent authority must consider the aircraft noise provisions.	<p>The Acoustic Assessment (Attachment 15) confirms the typical commercial and industrial façade constructions are expected to achieve the required internal aircraft noise levels.</p> <p>A detailed acoustic assessment will be undertaken as part of any future DA to determine the required building constructions for the proposed design.</p>
6.10 Design Excellence	Development consent must not be granted unless the consent authority considers that the development exhibits design excellence.	<p>Any future development application or SSD will be subject to design excellence considerations under clause 6.10 of the BLEP 2021.</p> <p>The Urban Design / Context Report which accompanies the draft PP (Attachment 4) includes an assessment of the concept design against clause 6.10. 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.</p> <p>A Curatorial Vision Framework has also been submitted alongside the draft PP (Attachment 21) and will guide the delivery of the large facade artworks expressing Aboriginal Connection to Country along a 700-metre-long journey of integrated artworks proposed on buildings QF1 - QF4. This public artwork forms a significant component of the public benefits which are being documented by the landowner in their Letter of Offer to Council.</p>
6.11 Essential services	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	The draft PP is supported by a Service Infrastructure Assessment (Attachment 18) which confirms the site is well-served, with substantial utility services infrastructure within the locality.

Control	Objective	Consistency
	made to make them available when required.	

Bayside Development Control Plan 2022 (BDCP 2022)

The key relevant section of the BDCP 2022 is Chapter 7.7 – Mascot West Employment Lands.

Under the heading 'Built Form and Land Use', the desired future character is identified as:

- *To ensure that the scale, design, material of construction and nature of the development contributes positively to the visual amenity and the gateway function of the area.*
- *To encourage and provide for industrial development that has an affinity or locational need to be near to Sydney (Kingsford Smith) Airport.*
- *To ensure development achieves suitable setbacks to Alexandra Canal and the Mill Pond*

The proposed increase in FSR from a base 1.2:1 and maximum 1.5:1, to a maximum 2:1, would not inhibit the ability for a future development outcome to achieve the above built form and land use objectives.

The draft PP contains a preliminary assessment of the indicative concept scheme against the key provisions of the BDCP 2022. The assessment shows that the future scheme can comply with the key provisions that apply with respect to design outcomes for industrial development as well as other precinct-specific objectives that apply in the Mascot West Employment Lands.

SITE SPECIFIC CONSIDERATIONS AND TECHNICAL STUDIES

Urban Design and Visual Impact

The draft PP is supported by indicative concept plans (**Attachment 3**), an Urban Design Context Report (**Attachment 4**), and a Visual Impact Assessment (**Attachment 6**).

Urban Design

The Urban Design / Context Report prepared by Lacoste + Stevenson and Paddock Landscape Architects (**Attachment 4**) provides an overview of the concept scheme and its design intent. The design analysis looks at an indicative 1.2:1 FSR scheme and compares this to the proposed 2:1 FSR scheme, which are also provided in detailed drawings at **Attachment 3**.

The Urban Design / Context Report demonstrates that the proposal to increase the FSR from 1.2:1 to 2:1 has little impact on the massing of the development proposed for the site. The benefits of the 2:1 scheme include lower floor heights permitting more floors within the permissible building height limit, resulting in greater articulation of the built volume. The increased number of floors provides for greater flexibility of possible tenants on the site.

A comparison of the design features and constraints of the 1.2:1 compared to a 2:1 scheme are outlined in **Table 12** below, and shown conceptually in **Figure 15** and **Figure 16**.

Table 12: Design Comparison – 1.2:1 vs. 2:1 scheme

Indicative 1.2:1 Scheme	Indicative 2:1 Scheme
GFA: 113,471 m ² Height: 44m	GFA: 189,131 m ² Height: 44m
Key Features & Constraints	
Key Features <ul style="list-style-type: none"> • 3 levels of warehousing • lower ground carparking / bike / end of trip under QF2 • FFL to FFL levels between 12m - 15m • 1 level of Cafe, Restaurant and Neighbourhood shop use proposed on Coward Street in front of QF2. QF1 proposes warehousing to the street. Constraints: <ul style="list-style-type: none"> • only large tenancies available with high racking. Fewer tenancies available compared to the 2:1 scheme due to fewer floor levels. • carparking on only one site will lead to lengthy pedestrian movements to the QF1 warehouse from the site carparking area. • limited Coward Street activation. QF1 is a 'blank wall' on Coward street. 	Key Features <ul style="list-style-type: none"> • 4 levels of warehousing • lower ground carparking / bike / end of trip under both QF1 and QF2 • FFL to FFL 8.5m and 9.5m with a 13m space on ground QF2 • Cafe, Restaurants and Neighbourhood shop over 3 levels in front of both buildings on Coward Street, activating the street. • Volumetrically the development is the same as the indicative 1.2:1 scheme however greater flexibility in tenancy options with more levels and a variety of spaces and floor heights. • Building articulation is greater compared to the 1.2:1 scheme with more floor levels providing greater articulation of the facade. Greater solid (warehouse wall) to void (hardstand) articulation at the scale of the building. • Site circulation is comparable (an additional carpark crossover is proposed to QF1 in the 2:1 scheme) • Landscaping is comparable.



Figure 15: Indicative Massing – 1.2:1 Scheme
 (Source: Lacoste + Stevenson Architects & Paddock Studio)

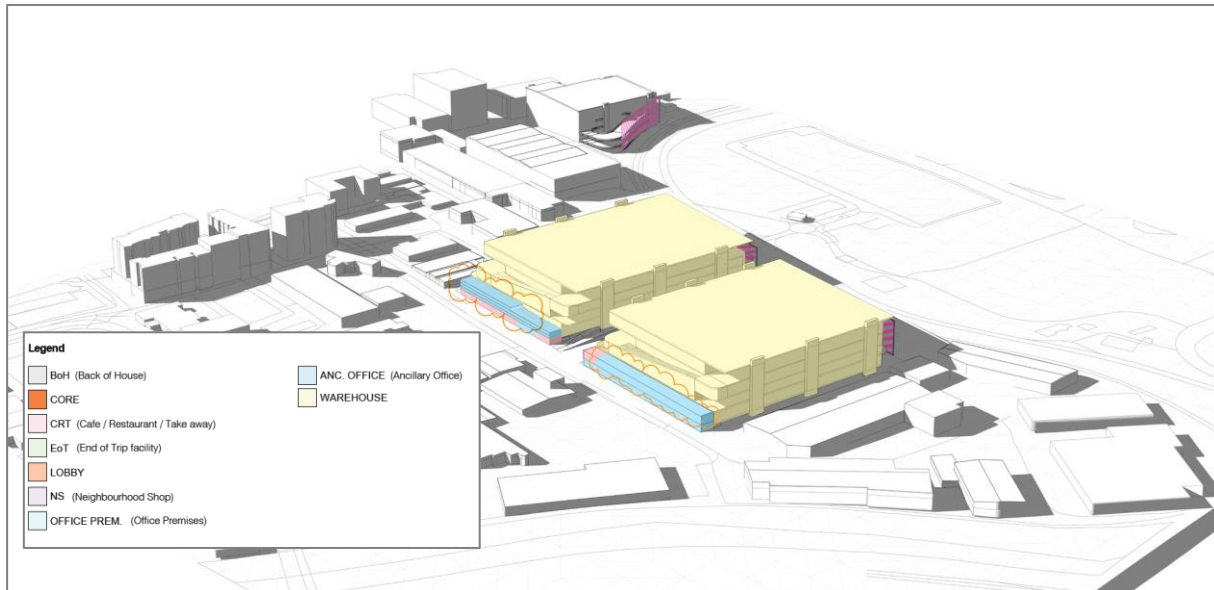


Figure 16: Indicative Massing – 2:1 Scheme
(Source: Lacoste + Stevenson Architects & Paddock Studio)

During the assessment of the draft PP, Council requested the applicant clarify the built form similarities between the 1.2:1 and 2:1 schemes and queries whether this comparison was genuine. In revised documentation submitted, the applicant indicated that, although the 1.2:1 scheme and the 2:1 scheme have the same footprint and height, the 1.2:1 FSR concept includes three levels of warehousing with higher finished floor levels (FFL), while the 2:1 FSR design provides 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.

The applicant submits that any redevelopment of the site would seek to optimise the maximum 44m height control to realise the maximum volumetric capacity of the tenancy. A 1.2:1 scheme would seek to deliver increased pallet racking heights and storage to optimise the site potential and tenancy space. The building envelope would be generally the same as a 2:1 scheme, however, it would result in less GFA based on the LEP definition.

As such, the proposed FSR uplift will have negligible impact on the overall bulk and scale of future development at the site.

Public Art – Connecting with Country and Curatorial Framework

A Public Art screen is proposed along the length of the southern facades facing Qantas Drive, which will be a platform for a significant Indigenous Artwork in a highly prominent location. The public art outcomes form a part of the proponent's Letter of Offer (for a Planning Agreement) which has been submitted alongside the draft PP (**Attachment 24**).

Detail surrounding the proposed public art screen are provided within the Urban Design / Context Report (**Attachment 4**), Curatorial Vision Framework (**Attachment 21**), and Connecting with Country Framework (**Attachment 22**) submitted alongside the draft PP. These identify the intention that, over the 10-year development timeframe of the LOGOS landholding redevelopments, architecturally integrated Aboriginal artwork will be commissioned for buildings QF1 - QF4 creating a 700 metre long "welcome to Sydney".

It is noted that a part of the combined public art proposal already forms a component of the SSD under consideration for QF3A and QF3B at 297 King Street, Mascot (SSD-49734709) and the SEARs Request at 350 King Street, Mascot.

Other 'Connecting with Country' initiatives will be developed and incorporated into the project as the consultation with indigenous knowledge holders continues through the design development phase, including incorporation of environmental sustainability initiatives in the design of the landscape and specification of native species, design of spaces to facilitate aboriginal businesses, selection of materials and colours of significance for use in the project.

Visual Impact

The VIA prepared by Paddock Landscape Architects (**Attachment 6**) has investigated any potential visual impacts on surrounding public and private spaces and provides a detailed assessment of the sensitivity and magnitude of those changes from a variety of surrounding public and private viewpoints. The VIA compares the existing baseline condition with two indicative concept schemes for the site, one being for a maximum floor space ratio of 1.2:1 and another with an increase to the maximum floor space ratio to 2:1.

A total of 15 viewpoints were selected for the VIA, comprising six (6) 'macro' and nine (9) 'micro' viewpoints shown in **Figure 17** and **Figure 18**. The overall visual impact assessment of the viewpoints has concluded that any future redevelopment of the site would have:

- Negligible impact from the Sydney Domestic Airport (viewpoint 13);
- Low impact from distant multi-storey residential towers (viewpoint 4);
- Low to moderate impact from directly surrounding streetscapes and roadways (viewpoints 8, 9, 10, 12);
- Low to moderate impact from distant surrounding streetscapes and roadways (viewpoint 3, 6, 11);
- Low to moderate impact from adjacent short term accommodation (viewpoint 15).
- Moderate impacts from surrounding streetscapes and roadways (viewpoint 14);
- Moderate impacts from the viewpoint from the CBD (viewpoint 1);
- Moderate to high impacts from distant views (viewpoints 2, 5); and
- High impact from directly surrounding multistorey residential towers (viewpoint 7).



Figure 17: 'Macro' viewpoints selected for the VIA.
(Source: Paddock Landscape Architects)



Figure 18: 'Micro' viewpoints selected for the VIA.
(Source: Paddock Landscape Architects)

The VIA provides the following with respect to 'moderate to high' (viewpoint 2) and 'high' (viewpoint 7) impacts associated with the proposal.

Viewpoint 2 – Sydney Park, Alexandria (Overall visual impact rating – Moderate / High)

The concept schemes would change the distant views from the viewpoint in the short to medium term. Any future development to the north of the site has a 44m height control and would effectively screen the proposed development from Sydney Park, with any future development impacting the remainder of the distant views. The proposed concept schemes height is not different to that already established in the neighbouring urban core of Mascot, however the scale of the single facade would be dominant.



Figure 19: Existing baseline condition – Viewpoint 2
(Source: Paddock Landscape Architects)



Figure 20: Viewpoint 2 – 1:2:1 FSR Scheme
(Source: Paddock Landscape Architects)



Figure 21: Viewpoint 2 – 2:1 FSR Scheme
(Source: Paddock Landscape Architects)

Viewpoint 7 – 39 Kent Road, Mascot (Overall visual impact rating – High)

The concept schemes would significantly impact the views from the existing residential towers within the south and western edge of the Mascot urban centre. Any future development to the east and north has a height control of 44m and would impact the remainder of the views. The proposed concept schemes height is not different to that already established in the neighbouring urban core of Mascot, however the scale of the facades along Coward Street and the eastern facade along Kent Road would be dominant.



Figure 22: Existing baseline condition – Viewpoint 7
(Source: Paddock Landscape Architects)



Figure 23: Viewpoint 7 – 1.2:1 FSR Scheme
(Source: Paddock Landscape Architects)



Figure 24: Viewpoint 7 – 2:1 FSR Scheme
(Source: Paddock Landscape Architects)

Summary

The VIA concludes that the effects of the future redevelopment would impact a mix of distant and close views, particularly from the north and west, but that existing structures to the east within the Mascot urban centre effectively screen the project site from the east. Other future Mascot West Employment Lands would also effectively screen the concept schemes in the long term, particularly from the north and west.

The concept schemes for the 2:1 FSR does not result in differing impacts to the views of the 1.2:1 scheme as the height and bulk are not substantially different. The differences between the two schemes include the location of vehicle access ramps and loading docks. The visual impacts of the concept schemes would be moderate in the short to medium term, but not substantially different 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 eventually developed to the 44m height control.

The VIA also notes that the inclusion of artworks to the southern façade of the concept schemes would be an improvement to the view, particularly from the south and from Qantas Drive and Sydney Gateway Road Project.

The VIA suggests the following mitigations be implemented for any future development at the site:

- Retention of existing trees and vegetation to the perimeter of the site to screen any future development and provide filtered views to the site. This includes the significant stand of native trees along the south-eastern boundary, southern boundary and along the Coward Street frontage.
- Articulation of the built form so that it provides contrast and interest to the facade, 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, active 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. This could also allow for a significant area of active and/or passive use for users of the site.
- New landscape areas that allow for supplementary native tree plantings not just to the boundaries of the site. This should include a diverse species mix of environmentally and culturally important species that reflect the surrounding areas wetlands, grasslands, heathlands, scrub and dry sclerophyll forests.
- Selection of materials and finishes that limit the amount of contrast and reflection with the surrounding landscapes.

These elements are able to be considered further in a future site-specific DCP which will be prepared for the site at the post-Gateway phase.

In summary, it is considered that the visual impacts associated with the draft PP are acceptable and can be mitigated at the future detailed DA stage. While it is acknowledged that there would be some visual impact resulting from a future development, these are not

dissimilar to those that would be experienced were the site developed to the current permitted height (44m) and FSR (1.2:1) controls under the BLEP 2021.

Flooding

A Civil Engineering Report (CER) was prepared by Costin Roe Consulting and provided in support of the draft PP (**Attachment 11**). As part of the CER a Water Cycle Management Strategy (WCMS) was prepared which includes an assessment of:

- Stormwater Quantity and Quality;
- Water Supply and Reuse;
- Flooding; and
- Erosion and Sediment Control.

The site is located within the Mascot, Rosebery and Eastlakes (MRE) catchment which is a tributary of the Alexandra Canal and located directly adjacent to an open concrete-lined Sydney Water stormwater channel that discharges into the canal. The site is affected by an overland flow path that enters the site from Kent Street, and dissipates to Coward Street and to the Sydney Water channel. Therefore, the site is required to provide flood management measures and offset storage to mitigate off-site flood impacts caused by the development.

The site is affected by overland flow flooding in the local 1% AEP flood event as a result of the overland flow paths from Kent Road towards Coward Street and the Sydney Water stormwater channel. The flood waters resulting from the overland flow path through the site have the lowest hazard category, being "*H1 generally safe for people, buildings and vehicles*". The flood water around the site is generally within a peak depth range of 0 - 0.5m, and the site is shown to be impacted by flooding during the 1% AEP and in more intense storm events from overland flows and flood storage.

The modelling within the CER demonstrates that during a 1% AEP storm event in a post-development scenario:

- There is no upstream change to flood levels external to the site for any of the flow paths which enter the site;
- Flows within the site are able to be conveyed to the stormwater channel through the inground culvert and the overland flow path;
- Flood storage is achieved within the carpark;
- Minor afflux is experienced around the site discharge point. We note this is likely a function of the flood modelling software and has no impacts upstream or downstream of the site.

The CER recommends the introduction of a Flood Planning Level (FPL) to be introduced in line with the *Floodplain Development Manual* recommendation for business/ industrial uses to be at or above the 1% AEP (1 in 100-year ARI) flood level plus 0.5m freeboard. The draft PP is consistent with this, with the lowest proposed habitable building level being at RL 6.80m AHD.

The CER has determined that the overall flood risk for and from the development is considered low to negligible. The FFL of the warehouse is proposed to be constructed at the council's

specified FPL and the existing overland flow path between King Street and the stormwater channel is proposed to be maintained.

The draft PP has demonstrated consistency with Direction 4.1 and the NSW Government's Flood Prone Land Policy; the principles of the Floodplain Development Manual 2005 and with the *Mascot, Rosebery and Eastlakes Flood Study* (document ref: 113077:190320) completed by WMAwater on behalf of the City of Botany Bay in March 2019.

The draft PP has demonstrated that the site is capable of suitably accommodating the proposed increase in density from a flooding perspective, and will not result in significant flood impacts to other properties.

It is recommended that flooding is addressed in a future site-specific DCP for the site to be prepared post-Gateway. Further, a detailed Flood Impact Assessment would be required in support of any future Development Application of the site.

It is considered that the flooding impacts associated with the draft PP are acceptable and can be mitigated at the future detailed DA stage.

Stormwater Management

As part of the CER prepared by Costin Roe Consulting in support of the draft PP, a high level assessment of stormwater management was prepared for the site. This assessment found:

- Local post-development flows of stormwater from the site will be less than pre-development flows;
- Site stormwater discharge will not adversely affect any land, drainage system or watercourse as a result of the development;
- During the future construction phase, a Sediment and Erosion Control Plan would be in place to ensure the downstream drainage system and receiving waters are protected from sediment laden runoff; and
- During the operational phase of the development, a treatment train incorporating the use of a primary and tertiary water quality treatment systems will be required to mitigate increased stormwater pollutant loads generated by the development.

It is noted that upgrades to the stormwater system in the vicinity of the site form a part of the proponent's Letter of Offer (for a Planning Agreement) which has been submitted alongside the draft PP (**Attachment 24**).

It is recommended the stormwater management objectives contained within the CER are used to inform a future site-specific DCP for the site, to be prepared post-Gateway. A detailed stormwater management strategy would also be required in support of any future Development Application of the site.

It is considered that the stormwater management impacts associated with the draft Planning Proposal are acceptable and can be mitigated and appropriately controlled at the future detailed DA stage.

Traffic

The draft PP is supported by a Transport Report (**Attachment 5**) which assesses the potential traffic impacts of the increased floorspace associated with the increased FSR and the complementary land use activities proposed to be included in Schedule 1 of BLEP 2021.

SIDRA network modelling was undertaken to assess four intersections on O’Riordan Street and four intersections on Kent Road and Coward Street, as identified by Transport for NSW (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 confirms:

- 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/Bourke 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 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 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.

The Traffic Report identifies several modifications would be required to accommodate the future development traffic at the intersection of Kent Road and Coward Street as a result of the draft PP as listed below:

- 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.

The implementation of the above measures would result in the intersection of Kent Road and Coward Street operating 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 which represents level of service C/D in the morning and level of service D in the afternoon peak periods. This 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.

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.

Economic Impact

The draft PP is supported by an Economic Impact Assessment (EIA) prepared by Urbis **(Attachment 10)** which assesses both the economic impact and economic benefits associated with the increase in FSR from 1.2:1 to 2:1.

The EIA finds that the warehouse floorspace associated with the proposal (166,877 sqm) will have a positive economic impact by:

- Facilitating the retention and optimal use of the existing employment lands supply,
- Addressing the current shortage of industrial floorspace,
- Helping to combat the growing rental and sales prices of industrial stock which are currently growing at rapid rates, and
- Meeting the growing demand for future warehousing and logistics floorspace in a highly suitable location.

Further, the office floorspace (11,558sqm of ancillary office and 8,047sqm of commercial office space or office premises) can be supported by the market and will have a positive

economic impact by helping to address a shortfall in office space in the area which is expected to be in the order of 84,704sqm in 2030. Given the shortfall, permitting office floorspace at the subject site will not have a negative impact on other office floorspace in the area. Retail floorspace (in the form of a proposed 1,400sqm of food and beverage and neighbourhood shops) will not undermine the commercial viability of retail in other centres and precincts and would have no more than 5.7% or less of trading impact on other retail centres and precincts.

The EIA also identifies a range of overall quantifiable economic benefits associated with the draft PP, including:

- Delivering 194 direct and 277 indirect construction jobs, and contributing \$305.4 million in direct and indirect value added, to New South Wales over the four-year development phase.
- Delivering 1,358 direct jobs through the ongoing operation of the additional facilities on-site and a further 943 indirect jobs from flow-on effects.
- Directly contributing an average of \$220.3 million in value added, and indirectly contributing a further \$164.1 million in value added, to the New South Wales economy on an annual ongoing basis.

During the assessment of the draft PP, the applicant was asked to investigate the implication of 'de-linking' bonus FSR at the site from airport-related uses. In response, the applicant assessed the synergies of the top 50 existing tenancies of industrial properties within the warehouse catchment. These 50 tenancies together account for around 646,100sqm of industrial floorspace within the catchment, representing around 45% of the existing total supply of ~1.44 million sqm of industrial floorspace within the warehouse catchment.

Around 18 of the 50 tenancies can be attributed to airport related uses, and these account for 49% of the overall floorspace of the top 50 tenancies in the catchment. These are mostly logistics businesses which benefit from being near the airport including DHL (54,500sqm), Australia Post (45,300sqm) and FedEx (29,300sqm). These 18 airport related tenancies have an average size of around 17,500sqm.

A much higher 32 tenancies are not considered airport related uses, and account for around 51% of the floorspace occupied by the top 50 tenancies. This includes businesses such as Nippon Paper (35,900sqm), Storage Plus (27,200sqm) and Gazal Apparel (19,487sqm). These 32 non-airport related tenancies occupy a smaller average size of ~10,400 sq.m.

The EIA highlights that the warehouse demand within the warehouse catchment is not exclusively driven by the benefit of being closely located to the airport. Instead, businesses are also attracted to the catchment due to its large clusters of existing businesses, inner city location, access to road infrastructure and its strong access to a high number of residents and workers.

Based on the above findings, it is considered that the draft PP has a positive net economic impact and is supportable from this perspective, and that there are no tangible risks associated with de-linking existing bonus FSR provisions from the development of airport related land uses.

Conclusion

This report has considered the strategic and site-specific merits of a planning proposal for land at 263 & 273 Coward Street, Mascot, to:

- Increase the FSR standard under clause 4.4 from the current base control of 1.2:1 to a maximum 2:1;
- Remove the site from the current Additional Permitted Use provisions under Schedule 1 Clause 14, which allows for the site to be developed for any purposes where the purpose is related to the operation of Sydney (Kingsford Smith) Airport, and also allows the FSR control to be increased to 1.5:1 for these developments; and
- Insert a new Additional Permitted Use clause to allow for:
 - Office premises (to a maximum of 5% of total floorspace associated with any development); and
 - Restaurant and/or café uses.

The proposal has been found to be consistent with the strategic planning framework applying to the site. In particular, the draft PP supports the protection of employment lands and will facilitate the renewal of the site for ongoing employment purposes. The draft PP also responds to strategic directions at a State and local level regarding the alignment of infrastructure and land use, as it will leverage recent significant road transport investments such as Sydney Gateway and WestConnex, and is also located within walking distance from rail transport at Mascot Station which can service the future workforce. The introduction of office uses to the site has also been capped at 5% of total GFA, which will ensure that the strategic hierarchy of centres is not compromised.

The draft PP has also given consideration to site-specific constraints and has demonstrated these can be addressed through any future development outcome. Key issues include:

- Visual impact and urban design, which has been considered through an Urban Design Report and Visual Impact Assessment. Although the proposal would result in some level of visual impact, these are no more significant than the visual impacts that would be experienced through a development under the existing planning controls of 1.2:1, and are therefore considered acceptable.
- Flooding and Stormwater, which has been appropriately addressed through the submission of a Civil Engineering Report which confirms that the site is capable of suitably accommodating the proposed increase in density from a flooding perspective, and will not result in significant flood impacts to other properties;
- Traffic, which has been considered through a Traffic Report which identifies that with the implementation of certain measures on nearby roads and intersections, these intersections will operate to a satisfactory level of operation.
- Economic Impact, which has been considered through an Economic Impact Assessment which demonstrates significant economic benefits associated with the proposal.

Giving consideration to the above, it is considered that the draft PP has demonstrated both strategic and site-specific merit, and is recommended to be submitted to the Department of Planning and Environment for a Gateway determination.

Attachments

- 1 Draft Planning Proposal Report
- 2 Survey Plan
- 3 Architectural Plans
- 4 Urban Design Context Report
- 5 Transport Report (Under separate cover Attachments Part One)
- 6 Visual Impact Assessment
- 7 Heritage Impact Statement
- 8 Aboriginal Objects Due Diligence Assessment
- 9 Landscape Concept Plan
- 10 Economic Impact Assessment
- 11 Civil Engineering Report (Under separate cover Attachments Part One)
- 12 Arborist Report
- 13 Preliminary Site Investigation (Under separate cover Attachments Part One)
- 14 Part 1 Detailed Site Investigation (Under separate cover Attachments Part Two)
- 15 Part 2 Detailed Site Investigation (Under separate cover Attachments Part Two)
- 16 Part 3 Detailed Site Investigation (Under separate cover Attachments Part Two)
- 17 Part 4 Detailed Site Investigation. (Under separate cover Attachments Part Two)
- 18 Acoustic Assessment (Under separate cover Attachments Part One)
- 19 Aeronautical Impact Assessment
- 20 Pipeline Hazard Analysis
- 21 Service Infrastructure Assessment
- 22 Proposed LEP Mapping
- 23 ESD Report
- 24 Curatorial Vision Framework
- 25 Connecting with Country Framework
- 26 Solar Glint and Glare Assessment
- 27 Letter of Offer