

9th February 2022

The General Manager
Penrith City Council
PO Box 60
PENRITH, NSW 2751

To whom it may concern,

STATEMENT OF ENVIRONMENTAL EFFECTS

PROPERTY: 68-124 Lockwood Rd, Erskine Park - Part Lot 1 in DP 1261030

PROPOSAL: Construction of one (a) Industrial Facility.

This Statement of Environmental Effects (SEE) forms part of a Development Application to Penrith City Council which seeks Consent for:

- Construction and 24/7 operation of four (4) industrial warehouse facilities in one building including ancillary office space, amenities, landscaping, hardstand loading / unloading areas and parking;

The single building will create approximately 47,638m² of industrial floor space and has been designed to accommodate up to four tenants within the proposed building. This building is a Speculative Warehouse and Distribution Center having no specific tenants at the time of this Development Application. A description of the proposed operation is outlined below.

1. The Site

The Fitzpatrick Industrial Estate (**Estate**) is approximately 140 hectares and is located on Lenore Drive in the area defined as the Erskine Business Park. The site is bound by Ropes Creek to the east, the Erskine Park residential area to the north and the Sydney Catchment Authority pipeline to the south. The Estate is legally described by the following identifiers:

- Lot 1 in DP1253870
- Lots 1, 9 & 10 in DP 1261030
- Lot 9 in DP 1261354

The Estate, refer *Figure 1.1*, as with the rest of the Erskine Business Park, is well located in the context of Western Sydney and the M4 and M7 Motorway. The Erskine Business Park now forms part of the Western Sydney Employment Hub, as identified by the Department of Planning and Environment, due to the area's strategic importance within the Sydney Metropolitan Area. The area provides a central location for employment generating activities whilst providing strong links with the major transportation infrastructure to facilitate the movement of goods regionally, nationally and internationally.

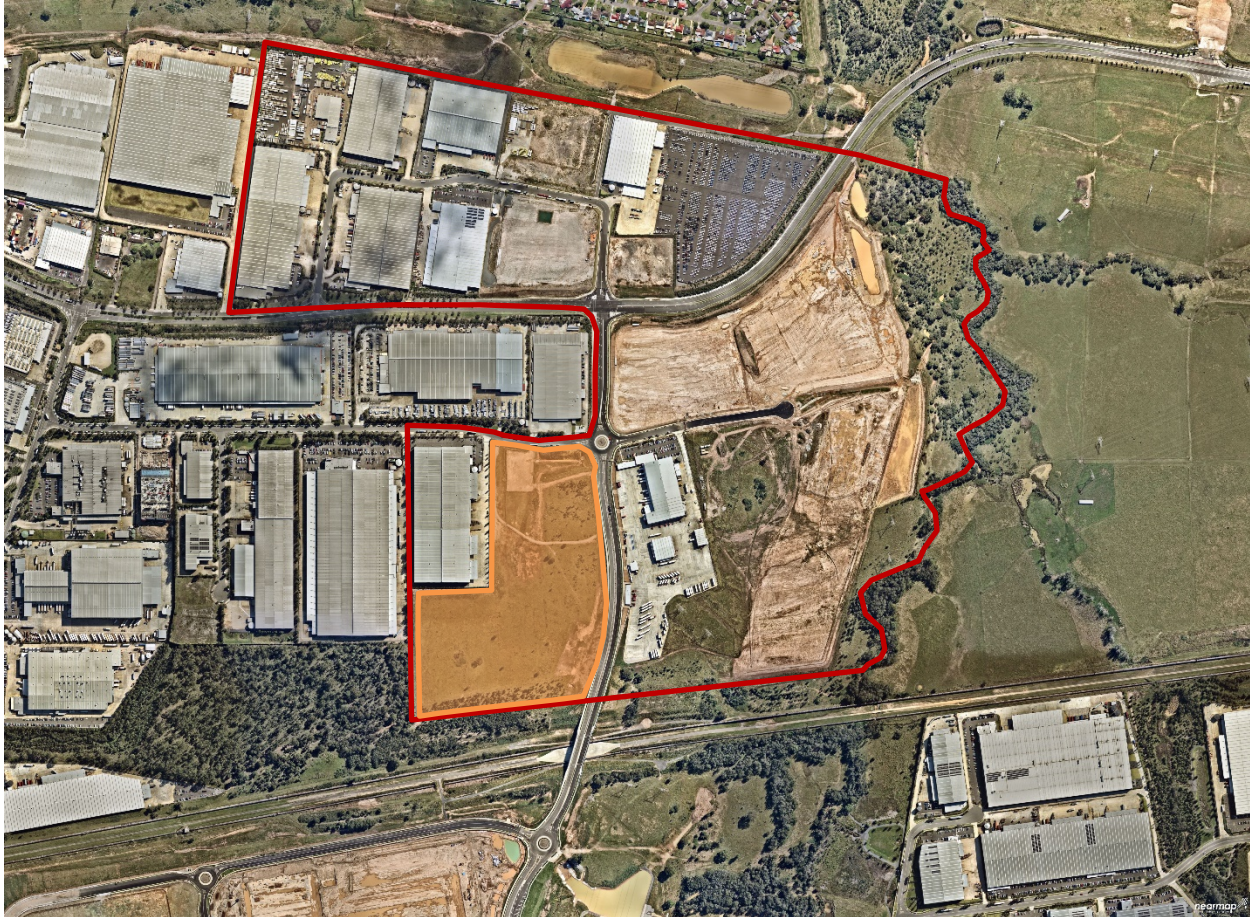


Figure 1.1: The Fitzpatrick Industrial Estate (Source: NearMap, 2021)

2. The Proposal

The Estate is wholly owned by Fitzpatrick Investments Pty Ltd (**Fitzpatrick**), who, since construction of its first development have progressively developed the Estate over time. The proposed facility will benefit from:

- Estate infrastructure provision and servicing; and
- Estate drainage in the form of the Northern Retention and Detention Basin along with the two Eastern Artificial Water Bodies which were constructed progressively to accommodate development and Council's road network since 2018.

The proposed site is located on the southern side of Lockwood Road and is approximately 17.33Ha in size (highlighted in orange in *Figure 1*). Bounded to the north by Lockwood Road and to the east by the newly constructed Compass Drive, the proposed industrial facility will be located to the east of the existing Acco Brands Warehouse (68 Lockwood Rd, Erskine Park). This facility will be primarily accessed via a newly constructed Private Estate Road which also forms part of an earlier application. This will avoid the need to construct any additional access driveways to Compass Drive.

The proposed facility has been described below and are illustrated in *Figure 2.1* for reference. Features are described on page 4:

Table 2.1: Details of the Proposed Development

<i>Lockwood Rd Speculative Warehouse 1</i>		
Site	Lease Area	47,638m ²
	Site Area	78,666m ²
	Site Coverage:	60.56%
Development Summary	Proposed construction and operation of:	
	Warehouse:	45,438m ²
	Office:	2,200m ²
	Dock/Warehouse Office:	
	TOTAL	47,638m²
	Parking Spaces	253
	Associated hardstand, external staff area and landscaping	
Warehouse Statistics	Loading Docks:	
		15 recessed loading docks
		22 at grade loading docks

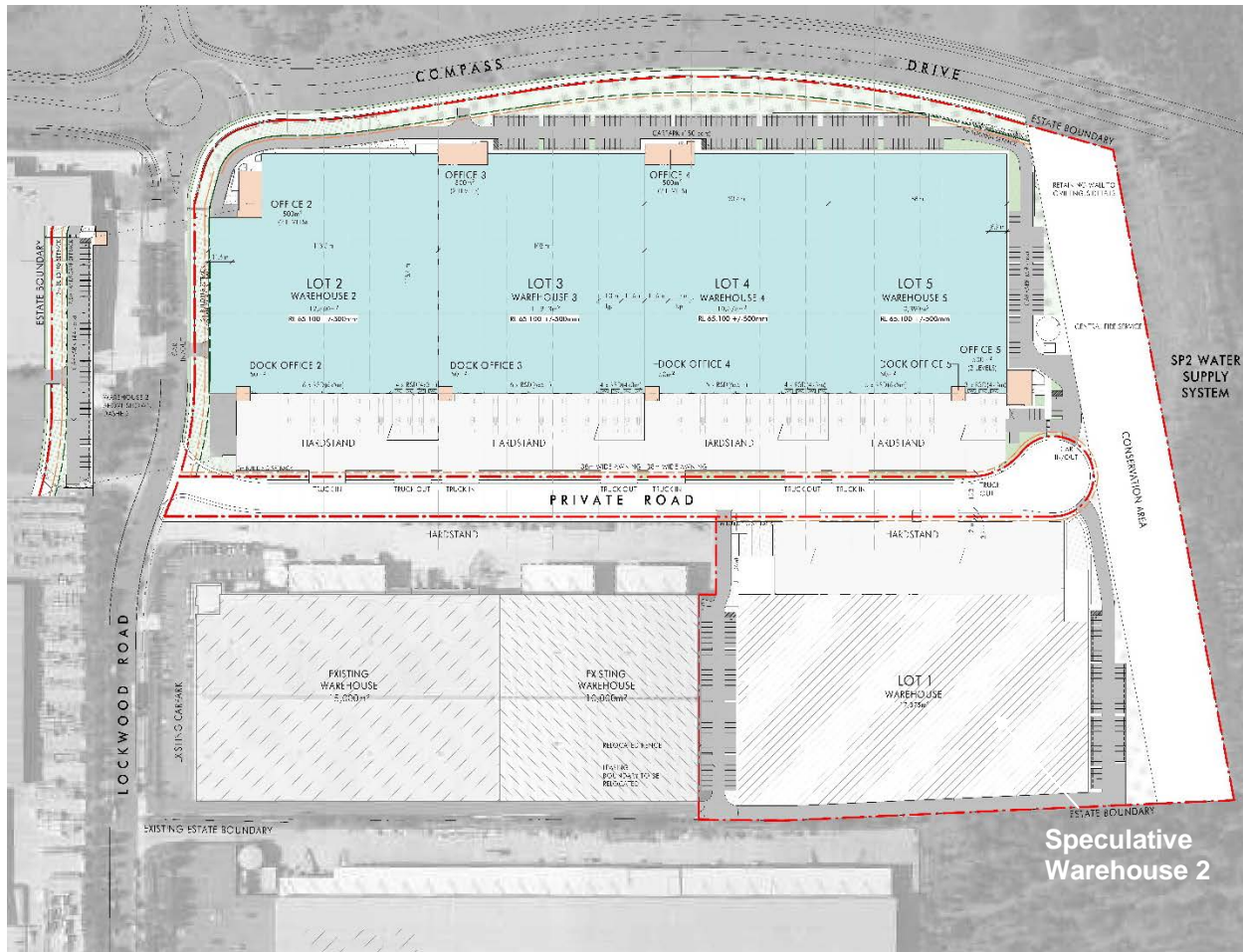


Figure 2.1: Proposed Industrial Warehouse Facility

Building / Structure	<p>The proposed building will be characterised by a concrete floor and steel structure, pre-cast concrete dado walls and metal cladding to walls and roof. The building will have a maximum height of 14.6 metres at the ridgeline.</p> <p>The proposed offices will be characterised by contemporary building materials such as pre-finished insulated panels and glazing. Appropriate architectural features will be used to emphasise the office and to clearly articulate building entries.</p> <p>The building has been designed to include the following ESD measures:</p> <ul style="list-style-type: none"> ▪ Rainwater Harvesting and Re-use (toilet flushing, irrigation); ▪ LED lighting throughout the Warehouse and lighting control measures including motion sensors; ▪ Translucent roof sheeting to maximise natural light; ▪ Provision for future installation of roof mounted PV Solar System/s ▪ Provision for future installation of electric vehicle charging ▪ Solar Hot Water System 				
Hours of Operation	<ul style="list-style-type: none"> ▪ 24 Hour 7 Day Operation 				
Traffic Movements	<p>The expected Traffic Generation has been established with reference to the RMS Technical Direction TDT 2013/04a (Guide to Traffic Generating Developments – updated traffic surveys). Please refer to the Traffic Impact Assessment completed by InRoads Group dated 23rd August 2021.</p>				
Employment Generation	<table border="0"> <tr> <td>Construction</td> <td>125</td> </tr> <tr> <td>Operation</td> <td>To be Determined but estimated to be 250</td> </tr> </table>	Construction	125	Operation	To be Determined but estimated to be 250
Construction	125				
Operation	To be Determined but estimated to be 250				
	<p>A detailed operational staff breakdown will be subject to a future application</p>				
Landscaping	<p>7.5 metre landscape setback to both Lockwood Road and Compass Drive and a 2 metre landscape setback to the Private Estate Road.</p>				
Drainage	<p>The proposed site will drain to the northern basin within the Fitzpatrick Industrial Estate. Please refer to attached technical reports.</p>				
Services	<p>Water, Electricity and Communications Infrastructure are available within the Lockwood Road reserve. Sewer Infrastructure exists along the eastern boundary of the estate (adjacent to the Conservation Area).</p>				
Fencing	<p>Palisade style fencing to Lockwood Road, Compass Drive and along the Private Estate Road frontage. PVC coated chain wire mesh to other boundaries.</p>				
Bulk Earthworks	<p>Bull earthworks will be completed under a separate DA..</p>				
Private Estate Road	<p>The internal Private Estate Road will be completed under a separate DA..</p>				
Subdivision	<p>Subdivision will be completed under a separate DA..</p>				

3. Statutory Framework

3.1 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* provides the legislative framework for all development within NSW. Section 4.15 of the Act establishes a set of assessment criteria that must be considered by the consent authority when assessing development subject to the provisions of Part 4 of the Act. Section 4.15 indicates that the following criteria must be considered during the assessment process:

- a) *the provisions of:*
 - (i) *any environmental planning instrument, and*
 - (ii) *any draft environmental planning instrument that is or has been placed on public exhibition and details of which have been notified to the consent authority (unless the Director-General has notified the consent authority that the making of the draft instrument has been deferred indefinitely or has not been approved), and*
 - (iii) *any development control plan, and*
 - (iv) *any planning agreement that has been entered into under section 93F, or any draft planning agreement that a developer has offered to enter into under section 93F, and*
 - (v) *the regulations (to the extent that they prescribe matters for the purposes of this paragraph), that apply to the land to which the development application relates,*
- b) *the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,*
- c) *the suitability of the site for the development,*
- d) *any submissions made in accordance with this Act or the regulations,*
- e) *the public interest.*

The relevant environmental planning instruments are considered below in the context of the proposed development. The likely impacts of the proposed development are considered in Section 4.

3.2 State Environmental Planning Policy (State and Regional Development) 2011

This policy identifies development that is State significant development. In certain circumstances, development for warehouses or distribution centres is State significant development. Paragraph 12 of Schedule 1 of this SEPP provides that *Development that has a capital investment value of more than the relevant amount for the purpose of warehouses or distribution centres (including container storage facilities) at one location and related to the same operation* is State significant development. Relevant amount means in this instance \$30 million.

Discussions have been held with the Department of Planning, Industry and Environment in relation to the proposed development. The development comprises one building with 4 potential tenants and is not proposed with any one operator in mind. Although the development has a capital investment value of more than \$30 million, it is not related to the same operation. Consequently, the development is not State significant development.

3.3 Western Sydney Employment Area (WSEA) State Environmental Planning Policy 2009

State Environmental Planning Policy (Western Sydney Employment Area) 2009 (**WSEA SEPP**) provides the statutory planning framework for new development within the Erskine Business Park. The site is zoned IN1 General Industrial and the proposed development is consistent with the zone objectives outlined below:

- To facilitate a wide range of employment-generating development including industrial, manufacturing, warehousing storage and research uses and ancillary office space.
- To encourage employment opportunities along motorway corridors including the M7 and M4

- To minimise adverse effect of industry on other land uses
- To encourage a high standard of development that does not prejudice the sustainability of other enterprise or the environment
- To provide for small-scale local services such as commercial, retail and community facilities (including child care facilities) that service or support the needs of employment generating uses in the zone.

The follow clauses within the SEPP are considered relevant to the proposed development:

Table 3.1 Relevant Requirements of the WSEA SEPP

Cl.	Development Standard	Proposed Development
20	<p><i>Ecological Sustainable Development:</i> Consent authority to be satisfied with measures which are designed to minimise:</p> <p>(a) Consumption of potable water; and (b) Greenhouse gas emissions</p>	<p>The proposed development will involve the installation of rainwater tanks to harvest rainwater for use in irrigation and toilet flushing.</p> <p>Opportunities for reducing power consumption are currently being considered. A key feature includes LED lighting and translucent roof sheeting to maximise the availability of natural light into the warehouse. Provision for future installation of PV solar cells has also been incorporated into the Warehouse design.</p>
21	<p><i>Height of Buildings:</i> Consent authority must not grant consent unless it is satisfied that:</p> <p>(a) Building height will not adversely impact on the amenity of adjacent residential areas; and (b) Site topography has been taken into consideration</p>	<p>The height of the proposed warehouse facilities is 14.6m. The site is located south of Lenore Dr and is not located adjacent to any residential areas. Given this is the case there is no impact on residential amenity.</p> <p>The site topography and surrounding development has been taken into consideration when determining the height of the proposed facilities.</p>
22	<p><i>Rainwater Harvesting</i> Consent authority to consider whether connection to a rainwater harvesting scheme (if one exists) is appropriate.</p>	<p>The proposed development will incorporate rainwater harvesting facilities for the site. No local or regional rainwater harvesting scheme exists within Erskine Business Park and is therefore not applicable.</p>
24	<p><i>Development Involving Subdivision:</i> Consent authority to consider the following implications for development involving subdivision:</p> <p>(a) Implications of the fragmentation of large lots of land; (b) Whether the subdivision will affect the supply of land for employment purposes; and (c) Whether the subdivision will preclude other lots of land from having reasonable access to roads and services.</p>	<p>The subdivision will be completed under a separate DA..</p>

<p>25 <i>Public Utility Infrastructure</i> Consent Authority to consider the availability of public utility infrastructure including; water, power, gas and sewerage.</p>	<p>The Fitzpatrick Industrial Estate is well serviced by existing public utility infrastructure. All services are readily available to service the site.</p>
<p>26 <i>Proposed Transport Infrastructure Routes</i> Development adjacent to a proposed transport infrastructure route must be referred to the Director General for concurrence.</p>	<p>The proposed development is located adjacent to Compass Drive. The design of this development has been coordinated with the boundaries for this road as Fitzpatrick Investments was required to complete a land dedication to create the road corridor.</p>
<p>29 <i>Satisfactory Arrangements for the Provision of Regional Infrastructure</i> The consent authority must not consent to development on land to which this clause applies unless the Director-General has certified in writing to the consent authority that satisfactory arrangements have been made to contribute to the provision of regional transport infrastructure and services (including the Erskine Park Link Road Network) in relation to the land to which this Policy applies.</p>	<p>State Infrastructure Contributions are expected to be levied as part of any consent. Fitzpatrick Investments has entered into a Voluntary Planning Agreement with the Minister which confirms satisfactory arrangement are in place for the provision of regional transport infrastructure and services.</p>
<p>31 <i>Design Principles</i> The consent authority must take into consideration whether or not: (a) the development is of a high quality design, and (b) a variety of materials and external finishes for the external facades are incorporated, and (c) high quality landscaping is provided, and (d) the scale and character of the development is compatible with other employment-generating development in the precinct concerned.</p>	<p>The proposed building has been architecturally designed to ensure that it presents well to both Compass Drive and Lockwood Road. An appropriate level of colour and material variation has been incorporated into the design to articulate building facades. High quality landscaping incorporating native species as defined in Council's DCP is proposed. The scale of the proposed development is consistent with other development in the Erskine Business Park locality.</p>
<p>32 <i>Preservation of Trees and Vegetation</i> Consent authority to consider retention of trees and vegetation where possible.</p>	<p>Fitzpatrick Investments entered into a Voluntary Planning Agreement with The Minister to create a Biodiversity Conservation Zone which would offset the trees and vegetation removed as part of the development of the Estate.</p>

3.4 State Environmental Planning Policy No 55 – Remediation of Land (SEPP 55)

SEPP 55 nominates that:

*“A consent authority must not consent to the carrying out of any development on land unless-
a) It has considered whether the land is contaminated”*

Prior to commencement of development across the Estate the entirety of the Fitzpatrick land holding was subject to contamination investigation. The below timeline provides a chronology of the investigations

undertaken and the results of those investigations. The land is free of contamination and is suitable for industrial development:

- The Estate was investigated in 2006 with areas of contamination identified that were associated with surficial asbestos fragments.
- That contamination/asbestos presence was remediated and validated as detailed in the validation report completed by Consulting Earth Scientists dated 21 June 2007.
- Subsequent to that validation report, a further investigation of the area within the 'Fitzpatrick land', identified as 'Adams Property', was investigated. The investigation is detailed in the Stage 1 and 2 Environmental Site Assessment Report prepared by Consulting Earth Scientists and dated 15 August 2008. The ESA found contamination requiring remediation within the 'Adams Property'. This was associated with some asbestos containing material that required removal and an area of hydrocarbon impacted soil that required remediation by removal and validation.
- Remediation of the above occurred in 2008 and a final Validation Report was provided by David Lane & Associates dated November 2008.
- All development activity has been cut to fill with the exception of earthworks conducted as part of DA17/0154. Importation of fill as part of this consent was in areas north of Lenore Dr and has not affected the site which is the subject of this consent.

3.5 Erskine Park Development Control Plan 2006

The Penrith Development Control Plan 2006 (Part E6 Erskine Business Park) (**DCP**) provides the design requirements for development in the Erskine Business Park. The following section assesses the proposed development against the principles of the DCP.

The DCP comprises several core parts which establish the fundamental development controls applicable within the Erskine Business Park. The following section describes each of these requirements and provides relevant information in relation to the proposed development.

Site Development and Urban Design

Part 6.3 considers site development and urban design issues relating to the development of the site. The DCP provides development controls to achieve the objective detailed above. Each of these controls is addressed below where relevant with regard to the proposed development.

Height

The proposed building will have a maximum height of 14.6 metres at the ridgeline. The proposed height is consistent with the DCP.

Site Coverage

The site coverage of the proposed building is listed below:

- Lockwood Rd Speculative Warehouse 2 has a site cover of 60.56%

Setbacks

A 7.5 metre landscape setback is proposed along the front boundary to Lockwood Road and the side boundary to Compass Drive. As indicated by 6.3.3 (b) of the DCP, car parking and landscaping are permitted within the front setback on roads other than Erskine Park Road, Lenore Drive and Mamre Road.

Noise Pollution

Approval is being sought for 24/7 operation. This is considered appropriate given the locality of the Erskine Business Park. The proposed use (warehouse and distribution) would generate minimal noise in the context of other manufacturing industrial activities within the locality.

Soil Erosion and Sediment Control

Soil erosion and sediment controls plans have been prepared by Enspire and are submitted with this application. These plans have been prepared in accordance with the relevant requirements of Council and the State Government. This plan is attached for Council's consideration.

Air Pollution

The proposed development will not result in any significant air pollution emissions based on the nature of the proposed use. The facility will generate heavy vehicle movements to and from the site as is typical of most industrial activities of this nature. The site will also be completely sealed to ensure that no dust is generated as a result of proposed hardstand operations.

Stormwater Pollution Control and Drainage

Stormwater management (quality and quantity) is addressed in the Enspire Civil Engineering Report and is enclosed with the application. These plans have been prepared in accordance with the relevant requirements of Council.

Transport and Car parking

The proposed developments include the provision for a total of 253 car spaces as noted on the plans. The car spaces provided as part of the proposal adequately cater for the requirements for future tenant(s) of the Speculative Warehouses. An analysis of Council's and the RMS' parking requirements is included below.

Parking Requirement Comparison

	Land Use	Floor Area (m ²)	DCP Requirements		RTA Guidelines	
			Rate per m ²	Spaces	Rate per m ²	Spaces
Speculative Warehouse						
	Warehouse	45,438	1/100m ²	454	1/300m ²	152
	Ancillary Office	2,200	1/40m ²	55	1/300m ²	7
	TOTAL	47,638	-	509	-	159

For further details in relation to traffic and parking matters refer to the Traffic Impact Assessment prepared by InRoads Group Traffic Consultants dated 23rd August 2021.

Landscaping

A landscape plan has been prepared by Cabbage Tree Landscapes in accordance with the relevant provisions of the DCP.

Environmental Impacts

Noise

Minimal noise impacts are anticipated as a result of the proposed works and land use. Construction noise impacts will be managed through the implementation of appropriate hours of operation on site as defined by Council's standard development conditions. Operational noise impacts will be consistent with other land uses occurring within the location.

Traffic and Parking

Traffic and parking matters have been assessed in detail by InRoads Group Traffic Consultants. Anticipated traffic generation from the proposed development is consistent with original expectations of traffic generation on a per hectare basis within the Erskine Business Park. A total of 253 car spaces can be provided on site.

Ecological Sustainable Development

The following initiatives will be incorporated into the detailed design of the proposed building. These features are typical of most buildings within the Fitzpatrick Industrial Estate and represent a significant commitment to pursue sustainable development initiatives for both Fitzpatrick Investment and for tenants.

- A lighting control system will be installed in the facility to manage the use of artificial light, throughout the facility. This system can ensure that lighting is only used when meeting rooms and offices are occupied (via movement sensors when fitout installed). The system is also able to be programmed to measure the availability of natural light within the warehouse and to operate artificial lighting as required;
- The FDC group of companies will be engaged to undertake ongoing building tuning functions to ensure that services are operating effectively and efficiently ensuring optimum tenant comfort. Building tuning will occur regularly following practical completion for the extent of the warranty period;
- FDC Construction and Fitout Pty Ltd will produce a Building User's Guide to optimise the building's environmental performance through the availability of information. This document allows the transfer of knowledge from designers and builders to tenants and property managers;
- LED Lighting will be installed throughout the office. LED lighting typically has a longer life and provides approximately 70 percent energy savings compared to traditional light fittings;
- A reduction in potable water usage is achieved through rainwater harvesting. A rainwater tank will be installed on site to collect rainwater for the purposes of toilet flushing, irrigation and use for cleaning activities;
- Rainwater harvesting occurs within the rainwater tank to help reduce reliance on potable water. Appropriate filtration systems and mains water backup has been installed in accordance with the relevant Australian Standards;
- WELS rated hydraulic fixtures will be fitted throughout the facility to ensure that water is used efficiently;
- Translucent sheeting will be installed on the warehouse roof to maximise natural light availability. As described previously, the BMS can monitor natural light levels to determine whether artificial light is required;
- Double glazed window units will be installed to the office facade to reduce heat gain during summer and heat loss during winter, saving money and energy usage for heating and cooling of the facility;

- Proposed landscaping includes a selected range of Australian native ground covers, shrubs and non-deciduous trees native to the local area. Native species are selected for their tolerance of local weather conditions and their ability to attract native wildlife to the area;
- An automatic drip line garden irrigation system will be installed to all landscaped areas surrounding the office and site entry. This system is fed from the rainwater tank and would include a manual override function to provide flexibility to reflect conditions;
- Outdoor staff area will be provided adjacent to the staff lunchroom to provide an appropriate level of amenity;
- The site is located in Erskine Park which forms part of the Western Sydney Employment Hub. This area is strategically important in the context of the Sydney Metropolitan Area due to its location at the intersection of the M4 and M7 Motorways. These motorways provide major north/south and east/west linkages through the city. The M7 Motorway forms a significant part of the Sydney Orbital networks which provides linkages to Port Botany (via the M5 Motorway);
- The Western Sydney Employment Hub is also critical in the context of Sydney's population. Erskine Park provides employment opportunities in close proximity to the bulk of Sydney's blue collar workforce. The establishment of employment opportunities in these areas provide most employees with a shorter journey to work than other locations across Sydney;
- Public transport opportunities existing within the local area increasing as development occurs. Regular bus services, linking Liverpool and Penrith town centres, are provided via Mamre Road and Erskine Park Road and more recently Lenore and Compass Drives;

Visual Impacts

The proposal fundamentally involves one large warehouse building that has been designed with appropriate architectural treatment to ensure the scale and bulk of the building could be reduced when viewed from surrounding areas. The use of various materials including pre-cast concrete, metal cladding and varying colours, help to create interest with all facades. The proposed offices help to humanise the industrial scale of the proposed warehouse structures. Appropriate landscaping has been incorporated in order to help to soften the development in the context of the surrounding area.

Stormwater Management

Enspire has been engaged to prepare a Stormwater Management Plan for the site with consideration of the broader Stormwater Management Masterplan prepared for the estate. Although a detailed report and associated plans are attached for assessment, fundamentally, the site will drain to the northern stormwater basin which was approved by Council as DA09/0481.01.

Section 4.15 Evaluation

This section evaluates the environmental and planning implications of the proposed development against the relevant heads of consideration outlined in *Clause 4.15 of the Environmental Planning and Assessment Act, 1979 (EP&A Act)*.

Clause 4.15(1)(a) – Planning Instruments and Policies

As addressed above, the proposed development is consistent with the relevant state, regional and local planning instruments and policies. In particular, the proposed development satisfies the various requirements of the *State Environmental Planning Policy (Western Sydney Employment Hub) 2009* and the *Penrith Development Control Plan 2006 (Amendment No. 5)*.

Clause 4.15 (1)(b) – Likely Impacts on the Natural and Built Environment

The potential environmental impacts have also been assessed and considered above. The proposed development will take place on land zoned for industrial purposes under the State *Environmental Planning Policy (Western Sydney Employment Hub) 2009*. The Erskine Business Park area has been earmarked for industrial development for many years.

The proposed development has been designed and sited to ensure that potential environmental impacts are mitigated. The buildings have been architecturally designed to ensure that they appropriately address street frontages with articulated and attractive facades. The proposed buildings have been positioned and orientated to minimise noise impacts from the proposed land use by internalising the active hardstands and incorporating super awnings covering the hardstands. Visual impacts are mitigated by providing a 7.5 metre wide landscape setback along both Lockwood Road and Compass Drive.

Social and Economic Impacts on the Locality

The site forms a considerable part of the overall Erskine Business Park with close and convenient access to Lenore Drive which provides direct access to Erskine Park Road and the M4 Motorway or Old Wallgrove and the M7 Motorway.

The outcomes of development such as major road improvements, landscaping and other community infrastructure, coupled with growth in employment opportunities, will positively contribute the social environment of the local and regional community.

The establishment of a new business in the Penrith Local Government Area will result in the generation of new employment opportunities for the local population and will further stimulate the local and regional economy.

Clause 4.15 (1)(c) – Suitability of the Site

The site of the proposed development is considered suitable for a number of reasons including:

- The site is located within the identified Erskine Business Park which is intended to accommodate employment opportunities and economic development for the Penrith Local Government Area;
- The site is well located with regard to its proximity to the M7 and M4 Motorways and therefore the rest of NSW major road networks;
- The site is well located in the context of the local and regional community with regard to providing employment opportunities;
- The site is located well clear of the surrounding residential areas of Erskine Park and St Clair.

Clause 4.15 (1)(d) – Submissions

Council will consider and assess any submissions made in relation to the proposed development.

Clause 4.15 (1)(e) – Public Interest

The proposed development will significantly contribute to the ongoing growth and development of the Erskine Business Park and the greater Western Sydney Employment Hub. The establishment of additional warehouse facilities to accommodate business within the Penrith Local Government Area will result in the creation of employment opportunities that did not exist previously. These opportunities will be coupled with the benefits generated by economic growth.

Conclusion

The documentation supporting this Development Application illustrates that the proposed development is consistent with Council's, and the wider community's, aims and objectives for development in the Erskine Business Park. The proposal has very few implications on surrounding land uses, which has been clearly illustrated from the above consideration of relevant local and state environmental planning instruments and policies.

The development will achieve the objectives of Council's planning controls and provide a development that will favourably contribute to the sustained economic growth of the local and regional area.

Consideration of the development in accordance with the relevant heads of consideration outlined in *Clause 4.15 of the Environmental Planning and Assessment Act 1979* and consideration of the likely impacts of the development demonstrates the proposal is a suitable use of the site and is in the public interest both in a local and regional context.

The proposed development should therefore be considered favourably by Council and supported.

We trust the above information will assist you in facilitating a prompt and positive assessment of the proposed modifications. Should you have any queries or require any further detail, please do not hesitate to contact the undersigned on 8117 5105 or 0410 579 154.

Yours sincerely,
Fitzpatrick Investments Pty Ltd



Jamie Stewart
Project Director

Please find enclosed:

- Waste Management Plan, prepared by FDC Construction & Fitout Pty Ltd
- Traffic and Parking Assessment Report, prepared by InRoads Group
- Architectural Plan
- Landscape Plan
- Stormwater Management Report
- Civil Plan