

08038
05 May 2009

Mr Sam Haddad
Director General
Department of Planning
Level 1
23-33 Bridge Street
SYDNEY NSW 2000

Attention: Michael Woodland

Dear Mr Haddad

PART 3A REQUEST FOR MINISTER'S DECLARATION AND PRELIMINARY ENVIRONMENTAL ASSESSMENT REPORT
15-21 PARRAMATTA ROAD, AUBURN
COSTCO WHOLESALE AUSTRALIA PTY LTD

We are writing on behalf of Costco Wholesale Australia Pty Ltd ("Costco"), to request that the Minister for Planning form an opinion that the proposed Costco Wholesale outlet and Australian Head Quarters (HQ) at 15-21 Parramatta Road, Auburn is a 'major project' to be determined under Part 3A of the *Environmental Planning and Assessment Act, 1979* (the EP&A Act).

The purpose of this letter is to seek an order of the Minister in accordance with Section 75B(1)(b) of the EP&A Act or a declaration that the project is of the kind described in Group 5 in Schedule 1 (classes of development) of State Environmental Planning Policy (Major Projects) 2005 ("the Major Projects SEPP").

Should the Minister form the opinion that the project is one to which Part 3A applies, we request that:

1. The Minister authorise the proponent to submit a Concept Plan and Project Application (to be assessed concurrently) for the proposed development; and
2. The Director General issue the requirements for the preparation of an Environmental Assessment to accompany the Concept Plan and Project Application for the proposed development.

To support the request for the Director General's requirements relating to environmental assessment, this submission also acts as a Preliminary Assessment relating to the project. The Preliminary Assessment provides detail on the site location, the proposed development, statutory context, and identifies the key likely environmental and planning issues associated with the proposal. Preliminary Concept Plans of the proposed development are provided at **Attachment A**.

1.0 SITE DESCRIPTION

The site is located at 15-21 Parramatta Road, Auburn. The site is bounded by the M4 Freeway to the north, Parramatta Road (Great Western Highway) to the south, light industrial premises to the east and Haslams Creek to the west. The site is located immediately opposite the Lidcombe Power Centre development (sometimes referred to as the Spotlight site). A locality plan is provided at **Figure 1**.

The site is legally described as Lot 1 in DP 214452 and Lot 1 in DP 522225 and is owned by Tallen Pty Ltd. It has a total site area of approximately 2.6 hectares (ha). The site is generally flat and currently contains a light industrial warehouse building (which occupies approximately 80% of the site), circulation, car storage and access space. An aerial photograph, showing existing development on site is provided at **Figure 2**.



Figure 1 - Locality plan



Figure 2 - Site plan

2.0 COSTCO WHOLESALE

2.1 Overview of Costco Wholesale

Costco operates from some 554 locations worldwide, including the USA and Puerto Rico (407 stores), Canada (76), Mexico (31), UK (21), Japan (8), South Korea (6) and Taiwan (5). An underlying principle supporting the Costco approach is membership (which costs US\$50 (AUD \$60) per annum) that entitles the member to shop at any Costco store worldwide. Memberships can also be taken out by businesses and this is especially important for small businesses with trade supplies accounting for between 30-40% of sales volumes.

As the 4th largest retailer in the USA, Costco offers brand name products and services for less cost because of its very significant purchasing power, with savings passed on to members. Costco offer a unique shopping experience, with customers typically shopping for commodities every 10 days to 2 weeks and have a drive time up to between 30 to 45 minutes. As such each store has a regional wide trade area.

Outlets are designed to help small to medium sized business reduce costs in purchasing for resale and for everyday use, as well as for individuals to purchase for their personal needs. The stores operate on a membership scheme where by members pay a yearly membership fee that entitles them to shop at any Costco store worldwide.

Costco has two types of membership:

- Business Membership - available to all licensed businesses, non-profit organizations, government agencies and farmers.
- Gold Star Membership - available for individuals who do not qualify for a Business Membership.

2.2 Costco Wholesale Australia

Costco is seeking to establish its first Costco Wholesale in NSW and the opportunity to accommodate its Australian Head Quarters at 15-21 Parramatta Road, Auburn. The Capital Investment Value (CIV) of this project is \$55.4 million.

Establishing Costco's first outlet in NSW will allow the company to continue to pursue its program of investment in NSW. If the Costco model is successful, as has been the case in the UK, North American and Asian markets, Costco foresees as many as five outlets in the Sydney Region and others in the interior of NSW.

The Australian HQ will support outlets proposed in other states, including the first Costco Wholesale currently under construction in Melbourne. The head office functions will include management, finance and accounts, sales, marketing, human resources and information technology. It is important that these offices are co-located with a Costco Wholesale outlet so that Costco managerial and administrative staff can easily view and access an outlet, oversee operations and provide suppliers the opportunity to view the operations of a store first hand when visiting the offices.

3.0 THE PROJECT

The proposed project, as illustrated in concept drawings provided in the Concept Site Plan (Drawing Number Site 07, dated 31 March 2009), Concept Floor Plans (Drawing Number 1F-07, dated 31 March 2009 (first floor) and Drawing Number RT-07, dated 31 March 2009 (Second Floor and Roof Top) at **Attachment A** provides for:

- Demolition of the existing light industrial warehouse building with the exception of the existing concrete slab across the site.
- Construction of a 3 storey Costco Warehouse and commercial premises building with on site car park. A level by level description of the development is provided below:
 - **Ground floor** - car parking, entry point and tyre sales centre;
 - **First floor** - Costco Wholesale outlet, commercial premises (part of the Head Office component) and loading dock;
 - **Second floor/Rooftop** - commercial premises (part of the Head Quarters component) and rooftop car park.
- Retention of existing two vehicle egress points off Parramatta Road.
- Tenant and Building identification signage.
- Associated landscaping.

The concept drawings provide for:

- Approximately 14,000 sq m of retail premises, the majority of which is provided across one trading floor with a separate tyre sales and tyre installation outlet;
- Approximately 2,300 sq m of commercial premises across three levels provided at the western end of the building; and

- Provision for approximately 880 car park spaces, of which approximately 490 are provided on the ground floor, 370 are provided on the rooftop car park and 20 spaces are provided around the perimeter of the building.

The Concept Plan and Project Application are to be provided in a single document and assessed concurrently. The Concept Plan and Project Application will seek approval for:

- demolition works;
- all land uses;
- detailed building design (including maximum building heights, setbacks etc);
- pedestrian and vehicle access and internal circulation;
- car parking;
- building services;
- associated landscaping and signage location; and
- materials and finishes.

Costco's operating philosophy to keep costs down and pass the savings on to the members directly impacts on the design of the building and the building's internal layout. Photographs of the internal layout of an existing Costco are provided in **Figures 3 to 5**.

Lower costs are achieved through carrying a relatively limited number of products (4,000 stock keeping units, opposed to a traditional supermarket which carries between 20,000 and 30,000 stock keeping units). High turnover enables Costco to operate on lower than usual margins which are typically only around 10%. The range of products sold is wide ranging from groceries, appliances, televisions and media, automotive supplies, toys, hardware, sporting goods, jewellery, watches, cameras, books, housewares, apparel, health and beauty aids, furniture, office supplies and office equipment at prices consistently below traditional wholesale or retail outlets.

No frills merchandising is also a feature of the Costco operation, including minimal handling costs, with most of the merchandise displayed on the original shipping pallets from the receiving dock to the store floor, and in some cases displayed on steel shelves. For the shopper, the hallmark of shopping at Costco is the high quality and competitive prices of the products and services that are available.



Figure 3 – Example Photograph of the Internal Layout



Figure 4 – Example Photograph of the Internal Layout



Figure 5 – Example Photograph of the Internal Layout

4.0 PLANNING FRAMEWORK

Strategic planning documents and planning instruments relevant to the proposed development or applying to the site are listed and described below.

4.1 EP&A Act 1979

Section 75B of the EP&A Act 1979 provides the Minister for Planning with the power to declare specific development as being subject to Part 3A of the EP&A Act 1979. Section 75B(2) allows the Minister to form an opinion that the development is of State or regional environmental planning significance and is development to which Part 3A of the EP&A Act 1979 applies.

Development to which Part 3A of the EP&A Act 1979 applies can also be identified by way of it being described in a State Environmental Planning Policy, most usually the Major Projects SEPP.

4.2 Major Projects SEPP 2005

Clause 6 of the Major Projects SEPP provides that development that in the opinion of the Minister is development of a kind referred to in Schedule 1 (classes of development) or Schedule 2 (specified sites) is declared to be a project to which Part 3A of the EP&A Act applies. Clause 13(1) (Group 5) to Schedule 1 in the Major Projects SEPP – Residential, commercial or retail projects, identifies the following development as development to which Part 3A can apply to:

“Development for the purpose of residential, commercial or retail projects with a capital investment value of more than \$50 million that the Minister determines are important to achieving State or regional planning objectives.”

The proposed Costco development has a “capital investment value” of \$55.4 million. It is therefore requested (for the reasons set out below) that the Minister form an opinion that the proposed Costco development is of a type listed in Schedule 1 of the SEPP and is therefore a Major Project to which Part 3A of the EP&A Act applies.

4.3 Meeting Criteria for declaring development to be a Major Project

The proposed development will have a capital investment of \$55.4 million. The proposed development is considered to be a development that is important to achieving State or regional planning objectives for the following reasons:

- It is the first stage and integral to the company’s state wide roll-out of outlets which together involve a significant investment (over \$120 million) in NSW.
- The establishment of Costco in NSW will introduce a new retail model into Australia. Restricting the availability of land for large format retailers directly hinders competition with retail competition being recently investigated by the Australian Competition and Consumer Commission (ACCC)
- Will create 225 positions with the HQ creating 70 jobs in the short term, expanding to 85 jobs in the medium term (within 1 to 2 years) and 100 jobs in the long term.
- The outlets’ main trade area extends regionally, generally from Hills Motorway in the north to the South Western Motorway in the south and inner Sydney in the east to the West Link M7 in the west. This extensive trade area encompasses a significant proportion of Sydney metropolitan area. It is difficult to find a comparative retail concept that relies on such a wide regional catchment.
- It will help to provide a new outlet for NSW manufacturers to take their brands to a wider market in NSW, nationwide and internationally.

- It will introduce a new format for retailing in NSW which has significant potential for flow on job generation for a range of manufacturers. Costco also provides small business with the opportunity to purchase low cost, high quality merchandise.
- The outlet is expected to attract significant numbers of shoppers annually among households and (mainly small) businesses.
- It supports the aims and objectives of state wide and Sydney metropolitan strategic planning policy including the provisions of the NSW State Plan, Metropolitan Strategy and Draft Subregional strategies. Compliance with these planning strategies is elaborated upon in **Section 3.4**.
- It will support Auburn Council's recent resolution to establish a large scale retail premises precinct along a defined area of Parramatta Road.
- Meets strategic priorities, aims and objectives identified by state and regional strategic planning documentation (detailed further below)

On the bases that the proposed development meets the thresholds of Clause 13(1) (Group 5) in Schedule 1 in the Major Projects SEPP and for such reasons as identified above we request the Minister declare the proposal to be a Major Project under Part 3A of the EP&A Act 1979.

4.4 Strategic Priorities, Aims and Objectives

Delivery of State Plan - The NSW State Plan provides a number of goals and priorities for the State of NSW for the future. The proposed development will directly help towards achieving Priority P1

"Increased business investment" and meet Priority P1 target to "continue to increase business investment through making NSW a more attractive place to do business".

The provision of a Costco Wholesale helps towards achieving Priority P1 by facilitating the following jobs and economic benefits:

- Creation of 25 senior positions in management and 175 positions in sales, stocking and the like, giving a total of 200 jobs. These jobs would equate to approximately 160 Equivalent Full Time positions (EFTs). As the outlet matures, it is anticipated that 250 positions would be created.
- Allowing for employment multiplier effects, creating a further 160 EFTs generated elsewhere in the local, metropolitan and national economies.
- Two hundred (200) site related construction jobs.
- Three hundred and twenty (320) indirect or flow-on jobs during the construction phase are expected as a result of the multiplier effect.

The direct investment of the project is in the order of:

- \$55.4 million investment on site (excluding land and stock).

Further, unlocking the opportunity to provide Costco Wholesales' first outlet in NSW and facilitating the company's program of investment, with as many as five outlets in the Sydney Region and others in the interior of NSW, generating in the order of:

- 450 positions in sales, stocking and the like;
- 435 jobs generated elsewhere in the economy by employment multiplier effect;
- 600 site related construction jobs; and
- 960 indirect or flow-on jobs during the construction phases.

Costco Wholesale will also help to provide a new outlet for NSW manufacturers to take their own brands to a wider market in NSW, nationwide and internationally and the direct and indirect job generation will assist in reducing the sub-region's above average unemployment rate¹.

Meeting Objectives of Metropolitan Strategy - The NSW Metropolitan Strategy identifies a number of corridors, including the corridor between Parramatta to Sydney. Referred to as the Parramatta Road corridor, the corridor is described as being an economic corridor, containing important economic activities, with significant opportunity for urban renewal.

The Metropolitan Strategy's vision for corridors is summarised below:

- Corridors are the areas around the transport routes that connect centres and activities.
- Economic corridors will play a key role in the metropolitan and national economy, renewal corridors will be the focus for diverse and liveable communities and enterprise corridors will provide locations for important local employment and services.
- Existing and new infrastructure investment in these corridors will be used more efficiently by concentrating new development in these areas to support their primary role.

Relevant objectives of Metropolitan Strategy for corridors can be summarised as:

- B5 Protect and strengthen the primary role of the economic corridor;
- B6 Focus development in renewal corridors to maximise infrastructure utilisation where demand and opportunities exists;
- B7 Recognise the role of enterprise corridors as locations for local employment.

The site is located in the centre of the economic corridor. The provision of a Costco Wholesale and HQ strengthens the corridor and will invest \$55.4 million in a under utilised site. Renewing the site and introducing an international 'anchor tenant' to the corridor will further strengthen the corridor by providing local employment as well as providing senior management positions into the local government area.

Meeting Policies of West Central Subregion Draft Subregional Strategy - The site is located within the West Central Subregion. The West Central Subregion Draft Subregional Strategy, published in December 2007, identifies seven corridors including 'Parramatta to Sydney CBD (Enterprise and Renewal Corridor) within which the site is located.

Policy B6 of West Central Subregion Draft Subregional Strategy aims to focus development in renewal corridors.

The proposed development supports this policy, investing and renewing a under utilised site in the centre of the corridor and providing small business (prevalent in this area) with the opportunity to purchase low cost, high quality merchandise for their own use of for re-sale (with sales to business representing approximately 30% of all sales at Costco).

Further, the proposed use will support the establishment of the large format retail centre proposed by Auburn Council which focuses development in renewal corridors.

¹ Census 2006 data identifies the national unemployment rate of 5.2%, in comparison with Auburn LGA unemployment rate at 9.1%, Central Western Sydney unemployment rate of 7.2% and Sydney Region unemployment rate of 5.3%.

4.5 Local Planning Framework

Auburn Local Environmental Plan 2000

The principal planning instrument relevant to the proposed development is Auburn Local Environmental Plan 2000 (LEP 2000). The relevant provisions of the Auburn Local Environmental Plan 2000 are set out in **Table 1** below. The site is zoned Zone 4C – Industrial Enterprise Zone. Permissible uses on the site include bulky goods retailing, showrooms, warehouses and distribution centres are permissible.

The proposed use would be defined as both a shop² (for the retail component), and commercial premises³ (for the Head Quarters component). Both uses are prohibited in the 4C – Industrial Enterprise Zone.

Under Section 75O(3) of the EP&A Act, the Minister is able to assess and approve a project that is not otherwise permissible. Section 75O(3) of the EP&A Act states:

“In deciding whether or not to give approval for the concept plan for a project, the Minister may (but is not required to) take into account the provisions of any environmental planning instrument that would not (because of section 75R) apply to the project if approved. However, the regulations may preclude approval for a concept plan for the carrying out of a class of project (other than a critical infrastructure project) that such an instrument would otherwise prohibit.”

Clause 8N of Environmental Planning and Assessment Regulation 2000 provides that Concept Plans or Project Applications which propose ‘prohibited development’ cannot be approved by the Minister in environmentally sensitive land or sensitive coastal locations. The site is not environmentally sensitive land or in a sensitive coastal location.

Table 1 - Relevant Provisions Auburn LEP 2000

Issue	Control
Auburn Local Environmental Plan 2000	
Zoning	Zone 4C – Industrial Enterprise Zone
Permissible Uses	Permissible Uses Include: bulky goods retailing; depots, equipment hire centres, light industries, showrooms, warehouses or distribution centres.
Zoning Objectives	<p>Zone objectives for Zone 4C – Industrial Enterprise Zone are:</p> <p>“(a) to recognise the special character of Parramatta Road frontages and surrounding areas,</p> <p>(b) to ensure that development in this zone does not reduce the economic viability of businesses in the business zones,</p> <p>(c) to provide the flexibility required to encourage innovative and high technology industrial uses in the zone,</p> <p>(d) to prohibit shops in this zone generally but permit minor retail development only where it is providing for the daily convenience needs of the local work force, is ancillary or incidental to other permissible development or is in the form of bulky goods retail outlets or motor showrooms.”</p>

² Auburn LEP 2000 Definition of ‘shop’ means “a building or place used for the selling, whether by retail or auction, or for the hiring or for the display for the purpose of selling or hiring, of items (whether goods or materials) but does not include a building or place defined elsewhere in this Schedule”.

³ Auburn LEP 2000 Definition of ‘commercial premises’ means “a building or place used as an office or for other business or commercial purposes or a call centre, but does not include a building or place elsewhere specifically defined in this Schedule, or a building or place used for a purpose elsewhere specifically defined in this Schedule”.

Draft Auburn Local Environmental Plan No 22 (Amendment No. 22)

On 3 December 2008, Auburn Council resolved to prepare a Draft LEP (refer to **Attachment B**), permitting certain forms of 'retail premises' in a defined area of Parramatta Road - which includes the site (identified in **Attachment B**). The Draft LEP requires 'retail premises' proposing to locate in the Draft LEP area to have:

- minimum site area of 20,000 sq m;
- minimum floor plate 10,000 sq m; and
- maximum floor space ratio of 1.5:1.

Council's objectives to permit retail premises in this locality are to:

- encourage large scale retail premises;
- revitalise a defined area of Parramatta Road by the introduction of new economic and employment opportunities;
- create an attractive precinct containing a range of uses;
- provide well designed buildings; and
- ensure the impacts of new development are appropriately managed.

In February 2009, Council sent a copy of the draft clause to nominated agencies for consultation in accordance with Section 62 of the EP&A Act 1979 and have undertaken preliminary public consultation. Council are currently considering submissions made during this period.

Auburn Development Control Plan 2000

The key provisions of the Auburn Development Control Plan (DCP) 2000 relevant to the proposed development are provided in:

- General Requirements DCP; and
- Industrial Areas DCP.

The General Requirements DCP provides a summary of the existing situation along Parramatta Road and provides commentary on 'intent' for future development. The intent and 'primary concerns' for this precinct for Parramatta Road can be summarised as:

- vehicular access to properties off Parramatta Road should be limited and desirable that access points be provided off side streets wherever possible;
- new development should introduce planning solutions that avoids the "missing tooth" effect when excessive parking is provided to the front alignment;
- limit the proliferation of signage; and
- provision for pedestrian safety.

The key provisions of the Industrial Areas DCP is summarised in **Table 2**.

Table 2 – Key Provisions of the Industrial Areas DCP

Issue	Control
Industrial Areas Development Control Plan	
Streetscape and Urban Character Objectives	<ul style="list-style-type: none"> ▪ To ensure that all new development is compatible with the existing and intended future character of the locality in which it is located. ▪ To promote industrial development which is both functional and attractive in the context of its local environment through appropriate design. ▪ To encourage innovative industrial design which adds to and enhances the quality of the existing industrial areas of the Auburn Municipality whilst recognising the design attributes of traditional industrial development.
Floor Space Ratio Controls	The floorspace ratio shall not exceed 1:1.
Building Form Objectives	<ul style="list-style-type: none"> ▪ To ensure that the form, scale, design and nature of development maintains and enhances the streetscape and visual quality of industrial areas within the Auburn Municipality. ▪ To ensure that the scale of any new industrial development is compatible with surrounding industrial buildings. ▪ To encourage a high standard of environmental design within new and existing industrial areas. ▪ To ensure the intensity of development recognises the environmental constraints of the site and its locality.

5.0 PRELIMINARY ENVIRONMENTAL ASSESSMENT

The key environmental considerations associated with the Concept Plan and Project Application that will be addressed in the Environmental Assessment for the project are expected to be as follows:

- site suitability;
- economic impact assessment, including retail market assessment and employment creation;
- access, traffic impacts and car parking provision;
- built form and visual impact, including assessment of height, bulk, scale, urban design considerations;
- demolition and construction management;
- flooding and stormwater drainage;
- utilities and services;
- waste management; and
- BCA Compliance.

5.1 Site Suitability

The suitability of the site has been a key consideration in site selection and the development of the proposal. The development is considered suited to the site in that:

- It is located in an area characterised by large scale retail and bulky goods outlets.
- The site is of suitable size and dimensions to accommodate the proposal
- The proposal endorses the aims and objectives of strategic planning policy in emerging local planning policy direction
- The development is of an appropriate scale and form to surrounding development
- The proposed use is an appropriate land use to locate along a major corridor.

- The site provides for adequate entry and egress points to minimise any adverse affects on the operation of traffic along Parramatta Road.

5.2 Economic Impact

To support the preliminary environmental assessment, a preliminary Economic Impact Assessment has been undertaken for a Costco Wholesale on Parramatta Road. In addition to detailing the number of jobs created, that report concludes:

- the importance of this locality for retail activities is evident by the large number of major retailers that have established in the area;
- Costco would introduce a new format for retailing and attract 630,000 shoppers annually among households and (mainly small) businesses;
- Costco would provide shoppers with retail choice, competitive prices, and personal interest in their shopping trip and provide small business with the opportunity to purchase low cost, high quality merchandise for their own use or for re-sale;
- Costco would play an important role as a retail anchor in Auburn, generating flow-on benefits for the wider area;
- Costco's forecast market share of the existing available retail expenditure of the catchment of residents is anticipated to be approximately 0.4% - 0.5%⁴ of available spending. The anticipated market share is expected to have only marginal effect, if any on other retailers; and
- Costco's trading impact would be equivalent to a reduction of 1.4% of sales captured by existing centres and freestanding retailers in the main trade area and 1.7% in Auburn local government area.

A full Economic Impact Assessment will be provided with the Environmental Assessment.

5.3 Access, Traffic and Car Parking

A preliminary traffic impact report has also been prepared which has concluded that the surrounding road network would be able to satisfactorily accommodate a Costco operation. To support the EAR, a traffic report will be prepared which address access, traffic generation impacts, parking and pedestrian access to surrounding retail units. The report will specifically address the impact of the proposal on the operation of Parramatta Road.

5.4 Built Form and Design

The development will be designed to achieve a design outcome which maximises the efficiency of land for the subject use and address pedestrian access and its interface with Parramatta Road. The EAR will address the height, bulk and scale of proposed development within the context of the locality and how potential impacts relating the built form will be managed.

The proposed height and bulk of the building is consistent with neighbouring development including a Bunning's Warehouse located to the west of the site (beyond Haslam's Creek) and a smaller warehouse occupied by Plush Furniture to the east of the site. The site is located directly opposite the Lidcombe Power Centre, which elevated above ground level and extends three/four storeys above Parramatta Road.

5.5 Demolition and Construction

A construction strategy will be included with the EAR to address how the works can be undertaken with minimal impact on:

⁴ Costco market share is anticipated to be 0.4% of available spending in 2011. With further growth in sales as the outlet reaches maturity, the market share would be approximately 0.5% of available spending across the main trade area by 2016.

- operation of Parramatta Road;
- operation of the M4 Motorway;
- water quality and run off into Haslams Creek; and
- operation of neighbouring commercial premises.

5.6 Flooding and Stormwater Drainage

A flood and stormwater management plan will be included with the EAR to address how any flooding issues (if apparent) affect the site and the treatment of stormwater and drainage across the site.

5.7 Utilities and Services

An assessment will be provided as to the capacity and any works required to provide adequate serving to the site.

5.8 Waste Management

A waste management report will be included in the EAR addressing the treatment and management of waste generated during construction and operation of the project.

5.9 BCA Compliance

The EAR will include a BCA Compliance Report that confirms the aspects of the project that will meet the deemed-to-satisfy provisions of the BCA, and any aspects of the development that will be subject to a performance based solution.

6.0 PRELIMINARY CONSULTATION

Costco Wholesale has undertaken preliminary consultations with the DoP, Auburn Council and the Department of State and Regional Development.

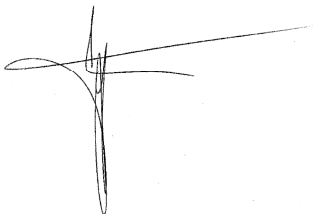
7.0 CONCLUSION

Facilitating the establishment of Costco in NSW will allow Costco to progress it's intended program of investment in NSW, which will lead to significant direct and indirect positive economic impacts for the State and the region.

Accordingly, it is requested that the Minister declare the project under Part 3A and authorise lodgement of Concept Plan and Project Application (to be assessed concurrently) and issue the Director Generals requirements for the preparation of an Environmental Assessment Report to accompany a Concept Plan and Project Application.

Should you have any queries about this matter, please do not hesitate to contact me on 9956 6962 or aduggan@jbaplanning.com.au.

Yours faithfully



Andrew Duggan
Associate