

09455
19 July 2010

The Director-General
Department of Planning
22 - 33 Bridge Street
SYDNEY NSW 2000

Attention: Mr Michael Woodland, Director Urban Assessments

Dear Mr Haddad

**PART 3A REQUEST FOR DIRECTOR-GENERAL REQUIREMENTS AND
PRELIMINARY ENVIRONMENTAL ASSESSMENT
164 STATION STREET, PENRITH (MP09_0192)**

We write on behalf of Parkview Pty Ltd, the proponent, to request the Director-General issue the requirements under Section 75M of the *Environmental Planning and Assessment Act 1979* (EP&A Act) for the preparation of an Environmental Assessment to accompany a Concept Plan for the redevelopment of their land at 164 Station Street, Penrith for a mix of residential, retail and associated uses (MP09_0192).

On 7 July 2010, the Minister for Planning declared the proposal as development of a kind described in Schedule 1, Group 5, Clause 13 of the *State Environmental Planning Policy (Major Development) 2005* (Major Development SEPP) and is a Project to which Part 3A of the EP&A Act applies. The Minister also authorised the submission of a Concept Plan under Section 75M of the EP&A Act for the proposal (refer to **Attachment A**).

The applicant proposes to submit a Concept Plan and Environmental Assessment Report (EAR) for the entire Project with a level of detail for the first stage of the Project sufficient for the Minister to approve it and determine under Section 75P(1)(c) of the EP&A Act that no further environmental assessment or application is required and to proceed to a series of staged construction certificates.

To support the request for the Director General's requirements relating to the environmental assessment, a Preliminary Assessment relating to the Project follows. The Preliminary Assessment provides detail on the site location and an outline of the Project, and identifies the key likely environmental and planning issues associated with the Project.

The Project will provide significant economic benefits and employment opportunities for the Penrith region. It will have no significant environmental impacts, no significant costs to the public, and a number of positive social and economic impacts. The Project has a Capital Investment Value of \$185 million and will generate some 600 equivalent full time operational and construction jobs.

1.0 THE SITE AND SURROUNDS

The site is located at 164 Station Street, Penrith and is legally described as being Lot 12 in DP 234581. It is commonly known as the 'Panasonic Site'. It has an area of 7.855ha and is bounded by Station Street to the west, Woodriff Street to the east, Jamison Road to the south with Nepean Square (Centro Nepean) to the north (**Figure 1**).

The site is essentially flat with only a slight fall of approximately 2.3m from the south-eastern corner (RL 28.51) to the north-western corner (RL 26.21). An easement in favour of Sydney Water affects the land along the northern boundary of the site.

There is a number of single storey industrial / warehouse style buildings on the northern portion of the site which have been used for a variety of industrial and light industrial purposes (**Figures 2 and 3**). The southern portion of the site is generally vacant. The site has relatively few trees, most being located at the northern end of the site scattered around the existing buildings. Access to the site is currently gained from two driveway crossings in Station Street towards the northern end of the site.

The site is located on the edge of the Penrith CBD and is approximately 1km from the Penrith Railway Station. Penrith Showground and Football Stadium adjoin to the west with multi-unit housing to the south, Jamison Oval to the south east and detached dwellings to the east.

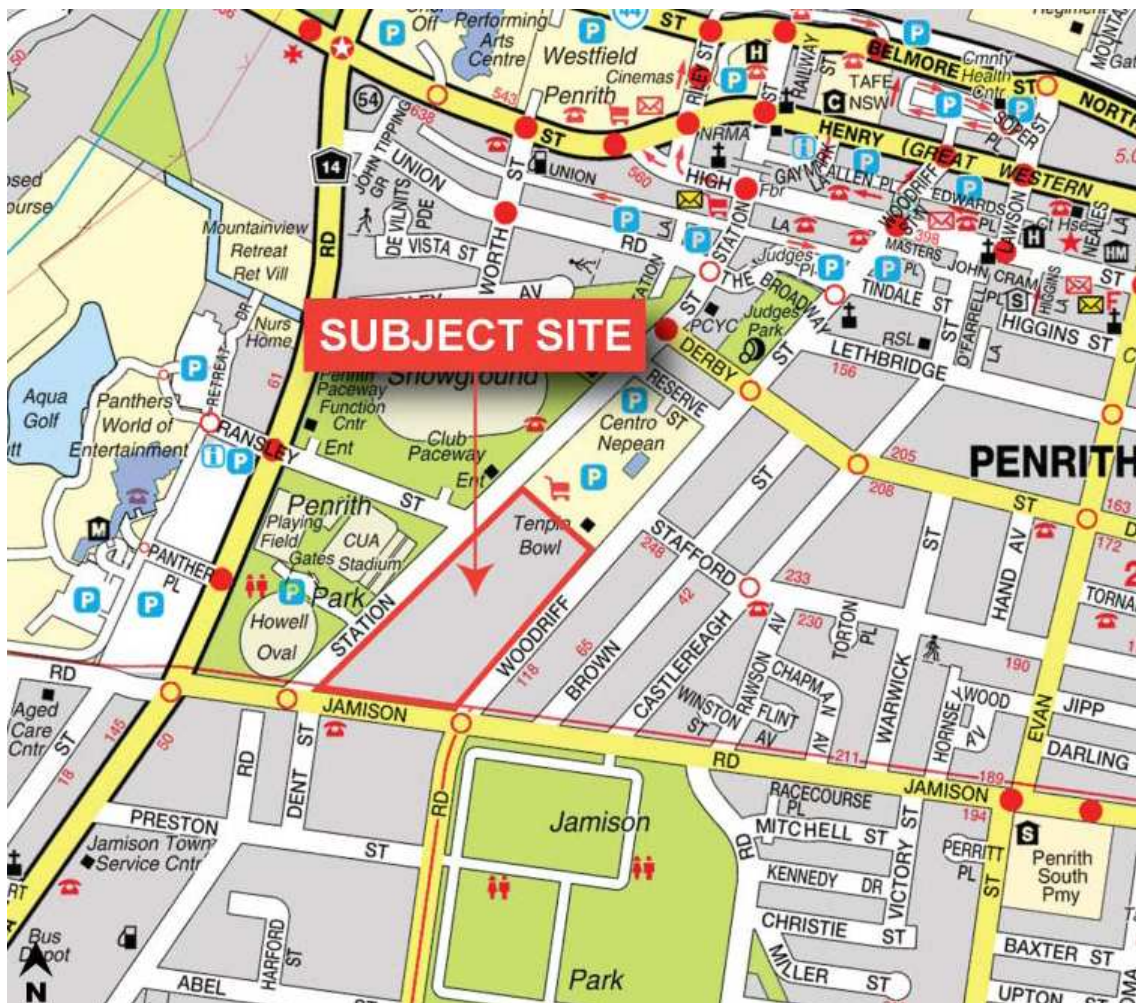


Figure 1 – Site Locality Plan

Source: UBD (extract from DFP SEE June 2008)



Figure 2 – Oblique aerial photo of the site looking north towards Penrith CBD

Source: Extract from DFP SEE June 2008



Figure 3 – Oblique aerial photo of the site looking west towards Penrith Stadium

Source: Extract from DFP SEE June 2008

2.0 PLANNING BACKGROUND

2.1 Penrith City Centre LEP 2008 (LEP 2008)

During 2006/07, the Department of Planning's six Cities Taskforce prepared a suite of planning controls for the Penrith City Centre – one of six 'Regional Cities' identified under the Sydney Metropolitan Strategy 2005. Parkview P/L participated in this process and, through Turner + Associates, developed master plan options for the site in consultation with Council and the Department. Key elements of the masterplan were subsequently adopted into the Penrith City Centre LEP 2008 and DCP 2007.

The Penrith City Centre Local Environmental Plan 2008 (LEP 2008) was gazetted on 1 February 2008. The site is zoned R4 High Density Residential, the zone objectives being:

- *To provide for housing needs of the community within a high density residential environment*
- *To provide variety of housing types within the high density residential environment*
- *To enable other land uses that provide facilities and services to meet the day to day needs of the residents*
- *To encourage the provision of affordable housing.*

Despite the residential zoning for the site, Schedule 1 (Additional permitted uses) of LEP 2008 permits the following uses:

Additional land use	Conditions
<i>Business premises (excluding restricted premises), Entertainment facility, Function centre, Hotel accommodation, Office premises, Retail premises (excluding restricted premises)</i>	<p><i>Development must be located in the northern portion of the site, identified as Area A on the Design Principles Map applying to Precinct 2–Panasonic, contained in the City Centre</i></p> <p><i>Development Control Plan. Development must be consistent with the design principles applying to that Precinct contained in that Plan.</i></p> <p><i>The gross floor area of development for the purpose of business premises or office premises, or a combination of those uses, must not exceed 20,000m².</i></p> <p><i>The gross floor area of development for the purpose of entertainment facilities, hotel accommodation, a function centre, or a combination of those uses, must not exceed 20,000m².</i></p> <p><i>The gross floor area of development for the purpose of retail premises must not exceed 3,000m².</i></p>

LEP 2008 nominates a maximum FSR of 2:1 across the site, and a maximum height of 20m across the majority of the site, with 24m along the full length of the Station Street frontage (for an unspecified depth).

2.2 Penrith City Centre DCP 2007

The Penrith City Centre DCP 2007 nominates the site as being within the 'High Density Residential' special precinct which is characterised as follows:

"This precinct comprises the former industrial site, which is unique given its location in the city centre, size and that it is under a single ownership. The site forms the southern gateway to the city centre, and is identified as a key site under the Plan.

The redevelopment opportunities of this precinct should result in a wide range of housing types at a density similar to a highly urbanized city. Such redevelopment needs to clearly address the interface with the much lower residential environment abutting its eastern boundary and to a limited extent, its southern boundary. Its proximity to services and facilities including transport nodes makes it ideally placed to encourage opportunities for live-work environments and affordable housing. It is envisaged that this precinct will be primarily residential in land use, there will be opportunities for a range of commercial and retail uses to be located here, adjacent to the City South (mixed use) precinct."

DCP nominates the following site specific controls:

7.3.2 PRECINCT 2 - "PANASONIC"

Precinct 2 is the area bounded by Station Street, Woodriff Street, Jamison Road and "Centro", as shown in Figure 7.3.

Development of the site must adhere to the following design principles:

- Provide good east-west and north-south connectivity with new public streets that are clearly integrated with the existing street network.
- Provide new public open space for the recreational needs of residents.
- Locate non-residential uses towards the northern end of the site where they will be in closer proximity to the city centre.
- Provide high quality public domain interface with existing public streets.
- Consider interface with heritage conservation area on the eastern side of Woodriff Street.

Development of the site should provide the following outcomes:

- a) Streets and pedestrian connections:
 - Provide at least two new public streets across the site with direct connections between Station and Woodriff Streets.
 - Provide a new pedestrian connection, parallel to Station Street, as illustrated.
 - Additional public streets, lanes and thoroughfare will be required to provide residential address, access, servicing and circulation within the site for vehicles, bicycles and pedestrians.
- b) Open space:
 - Provide public open space at a rate of 1.64 hectares per 1,000 people. This does not include the requirements for open space that serves a drainage function, biodiversity corridors, natural

areas or land for other community uses. The rate per dwelling is 2.7 persons

- The passive open space area does not include drainage reserves, riparian corridors and the like.
- All public open spaces will be clearly defined and easily accessible for both residents and visitor to the precinct.

c) Land uses:

- Locate a mix of retail, commercial, tourist accommodation and residential land uses in Area A (as indicated). The quantum of non-residential land uses permissible in Area A are identified in Schedule 1 of the Penrith City Centre Local Environmental Plan 2008.

d) Public domain interface:

- Front building setbacks as indicated.
- Distinctive corners treatments at the locations indicated.
- A landscaped corridor of mature trees on the northern side of Woodriff Street.



FIG. 7.3: PRECINCT 2 DESIGN PRINCIPLES



2.3 Relevant State Environmental Planning Policies (SEPPs)

The relevant SEPPs are summarised below:

- *State Environmental Planning Policy (Infrastructure) 2007*: referral to Sydney Regional Development Advisory Committee;
- *State Environmental Planning Policy No. 55 – Remediation of Land*: consideration of contamination;
- *State Environmental Planning Policies No. 65 – Design Quality of Residential Flat Development*: - design principles and 'rules of thumb' for apartments;
- *State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004*; environmental sustainability for residential apartments; and
- *Sydney Regional Environmental Plan 20 – Hawkesbury-Nepean River*: consideration of water quality issues.

2.4 Stage 1 Development Consent (DA08/0652)

On 15 December 2008, Penrith Council approved a Stage 1 DA (DA08/0652) on the site under section 80(4) of the EP&A Act. The Stage 1 DA approved, in concept, the key parameters for the site ie - gross floor area, land uses, building heights and envelopes, open space network, development staging etc.

A copy of Development Consent (DA08/0652) and key extracts of the Stage 1 DA Masterplan Drawings dated 13 June 2008 prepared by Turner + Associates is included at **Attachment B** and **C** respectively. The Stage 1 DA (**Figure 4**) approved a total 157,100m² of GFA (FSR 2:1) across the site with a breakdown as follows:

- 106,700m² residential (approximately 1,200 apartments);
- 3,000m² retail;
- 20,000m² commercial; and
- 27,400m² other (i.e. hotel).

The approved heights of building envelopes vary from 2 storeys to 16 storeys (~ 12m to 55m). This variable height was approved by Council on the basis that it would result in a better urban design outcome than a strictly height complying scheme. It is noted that only 6 public submissions were received by Council in response to the public notification of the Stage 1 DA.

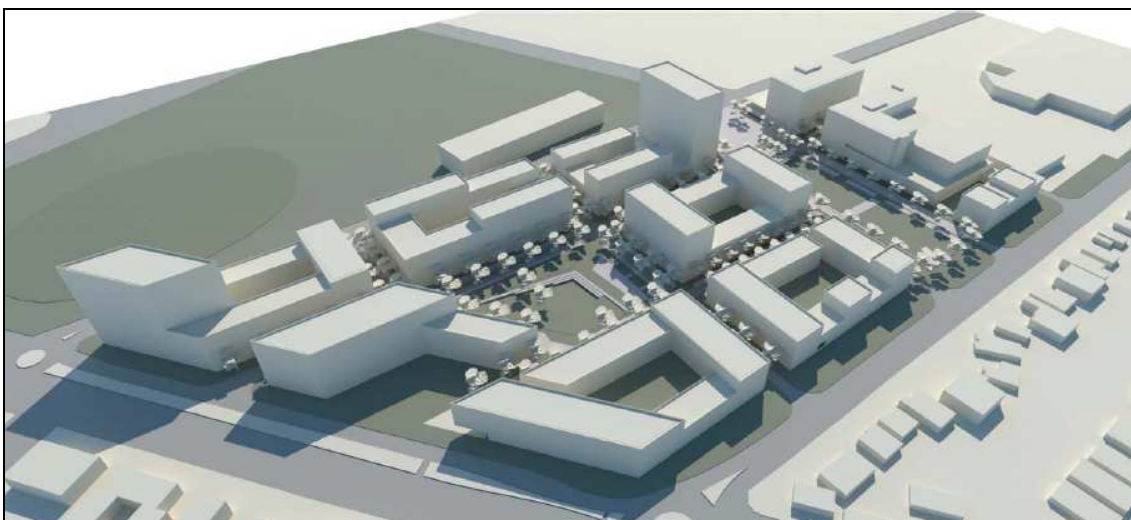


Figure 4 – Massing model of approved Stage 1 DA viewed from south

Source: Turners + Associates

2.5 October 2009 Concept Plan

On 23 October 2009, a request was made pursuant to clause 6 of the Major Development SEPP to declare the redevelopment of 164 Station Street, a project to which Part 3A of the EP&A Act applied and to seek the Minister's authorisation for the making of a concept plan. The clause 6 request was also accompanied by a preliminary environmental assessment. A site plan illustrating the layout of the October 2009 Concept Plan is illustrated below in **Figure 5**.



Figure 5 – The October 2009 Concept Plan layout

Source: Turners + Associates

The table below sets out the major development parameters proposed by the October 2009 Concept Plan. In essence, the Concept Plan maintained the precinct as a high density residential development as per the Stage 1 Development Consent, however the approved 20,000 m² office component was proposed to be replaced by some 18,000 m² of retail development.

Development Summary	October 2009 Concept Plan (GFA)
Residential	93,436 m ² (~ 930 dwellings)
Retail	18,636 m ²
Commercial	3,084 m ²
Other	8,914 m ²
Total	124,073 m²
FSR	1.58:1

On 26 November 2009, the NSW Department of Planning wrote to the proponent advising that it would not support the October 2009 Concept Plan noting in particular that:

“increasing the retail component in this city fringe location has the potential to undermine the town centre, promoted by the City Centres taskforce in preparation of the LEP. The LEP focuses retail development around the Railway Station and High Street area. The Department supports development consistent with the current LEP.”

3.0 THE PROJECT SUBJECT OF THE REVISED CONCEPT PLAN

Following review of the comments made by the NSW Department of Planning, a new request for a Concept Plan has now been prepared which builds upon the foundations for the site established by the Stage 1 Development Consent and is responsive to the concerns raised by the Department of Planning in their letter of 26 November 2009. In summary the Revised Concept Plan proposes:

- a redistribution of residential floor space so that a series of lower buildings are provided across the site;
- an much smaller increase in the quantum of retail floor space to be provided as part of the development; and
- a reduction in commercial office space provided.

In summary, the provision of commercial office space on the site is unviable where as the increase in retail floor space will provide the necessary impetus to commence the project and make it financially sustainable.

3.1 Masterplan Review

The table below provides a numerical summary of the Project and provides a comparison to the Masterplan approved by the Stage 1 DA. Masterplan drawings that will form the Revised Concept Plan (dated 11 March 2010) prepared by Turner + Associates are included at **Attachment C**.

Development Summary	Revised Concept Plan (GFA)	October 2009 Concept Plan (GFA)	Approved Stage 1 DA (GFA)
Residential	67,800m ² (~ 650 dwellings)	93,436 m ² (~ 930 dwellings)	106,700 m ² (~ 1,100 dwellings)
Retail	11,600 m ² (9,500 m ² NLA)	18,636 m ²	3,000 m ²
Commercial	0 m ²	3,084m ²	20,000 m ²
Other	4,260m ²	8,914 m ²	27,400 m ²
Total	83,670 m²	124,073 m²	157,000 m²
FSR	1.07:1	1.58:1	2:1

The Proponent is seeking Concept Plan approval for:

- broad land use distribution and blocks based on maximum parameters such as height, gross floor areas, maximum floor space ratio;
- building envelope locations and building footprints; and
- subdivision pattern and road layout.

The revised Masterplan (**Figures 5 and 6**) the subject of the Concept Plan provides for a series of buildings and envelopes. The significant elements proposed by the revised Masterplan are:

- the northern public plaza at the junction of Station Street and Ransley Street, central open space area and the provision of a central boulevard running the length of the site from north to south; and
- the distribution of predominately residential buildings on the southern portion of the site, including:
 - residential flat buildings along the Station Street, Jamison Street and Woodriff Street frontages and within the central portion of the site ranging in height from four to eight storeys;
 - two storey duplex housing along the new internal road network, surrounding the open space, boulevard and central residential building;

- the provision of a central boulevard/open space running the length of the site from north to south;
- mixed use retail and residential buildings across the eastern portion of the site anchored by the provision of a supermarket and discount department store in the south eastern portion of the site; and
- associated underground car parking, road access landscaping and infrastructure works.

The approximate quantum's of GFA and parking proposed in the revised Concept Plan are as follows:

- ~67,800 m² of residential floor space;
- ~11,613 m² of retail gross floor space (of which 9,500m² NLA);
- ~2,258 m² of neighbourhood shops and child care floor space;
- ~2,000 m² of tavern floorspace;
- ~1360 car parking spaces.



Figure 6 – The proposed Concept Plan layout

Source: Turners + Associates



Figure 7 – Aerial view of proposed revised Concept Plan

Source: Turners + Associates

3.2 Stage 1 Development Works

In accordance with section 75M(3A) of the EP&A Act, approval will also be sought for a detailed part of the overall development as part of the Concept Plan application. Full details and plans of the 'Stage 1 Development Works' will be submitted to enable approval of these works concurrently with the approval of the Concept Plan. These works include:

- the detailed design of the proposed retail centre including supermarket, grocer and specialty stores;
- the detailed design of the proposed Stage 4A, 4B and 4C residential development, including two four storey residential flat buildings and 12 two-storey duplex dwellings;
- bulk earthworks and excavation associated with the retail centre and Stage 4 residential development;
- underground car parking, road access, landscaping and infrastructure works associated with the retail centre and Stage 4 residential development; and
- subdivision of the site to create the development blocks for each development stage, as well as the roads and open space areas.

The extent of the 'Stage 1 Development Works' are shown at **Figure 8** below. The approximate quantum's of GFA and parking proposed in Stage 1 are as follows:

- ~ 11,611 m² of retail floor space (of which 9,500m² NLA);
- ~ 5,987 m² of residential floor space (47 units and 12 duplex dwellings);
- ~ 524 car parking spaces (450 retail car spaces, 74 residential car spaces).



Figure 8 – The extent of the Stage 1 Development Works

Source: Turners + Associates

4.0 APPROPRIATENESS OF CONCEPT PLAN TOOL

The Concept Plan will include detailed drawings and design of the Retail Centre and Stage 4A, 4B and 4C residential developments of the proposed development (excluding fit-out works). Therefore a separate Project Application for the retail centre and Stage 4A, 4B and 4C works is not required as all of the detail will have been assessed during the Concept Plan approval process. Given the common ownership of the site, the significant time spent to date in the planning for the site, it is considered that a Concept Plan is an appropriate and logical means of approval that not only sets the planning foundations for the site, but also allows the detailed design to be considered and the delivery of development on this underutilised CBD property to be realised in a timely manner.

Project applications or development applications will be lodged for the remainder of the works on site, including the fit-out works for the Retail Centre.

5.0 MAJOR DEVELOPMENT SEPP 2005

Clause 6 of the Major Development SEPP provides that development that in the opinion of the Minister is development of a kind referred to in Schedule 1 (Classes of development) and Schedule 2 (specified sites) is declared to be a project to which Part 3A of the EP&A Act applies. Clause 13 of Schedule 1 of the Major Development SEPP identifies the following developments as being Part 3A Major Projects:

Group 5 – Residential, commercial or retail projects

- (1) Development for the purpose of residential, commercial or retail projects with a capital investment of more than \$100 million.

The Project has a Capital Investment Value (CIV) of \$185 million (based on an estimate prepared by Parkview, dated 22 March 2010 **Attachment D**).

Notwithstanding the above, the Project meets the DoP criteria developed to assist in determining whether or not a project is likely to contribute to meeting State or regional planning objectives. Those criteria relevant to this Project are discussed below.

Criteria A – Local Impediments to Urban Renewal

Is the development within a centre or urban renewal area nominated for growth in the Metro Strategy or a regional or sub-regional strategy?

Yes, the site is located within the Penrith Regional City (**Figure 9**) – one of the six Regional Cities nominated within the Sydney Metropolitan Strategy 2005.

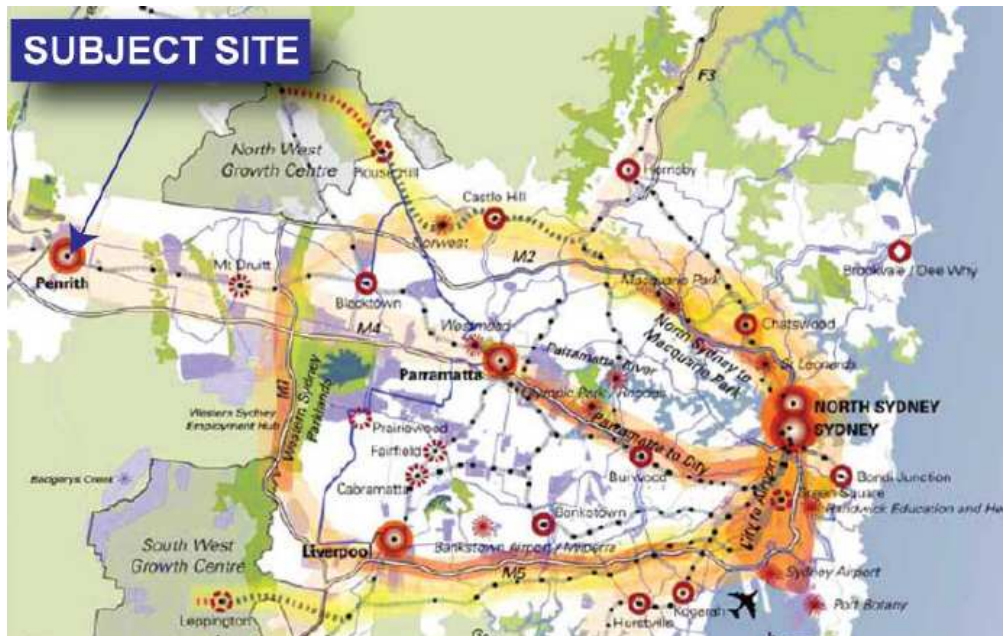


Figure 9 – Penrith Regional City

Source: Extract from DFP SEE June 2008

Are there provisions in the LEP which are likely to prevent or frustrate the implementation of the Metro or regional strategy?

The implementation of the revised Concept Plan requires an amendment to the land use mix permitted on the site under Schedule 1 of LEP 2008. To undertake a traditional rezoning / Planning Proposal process followed by a new Stage 1 DA and / or Part 3A approval would add unnecessary cost, time delay (18 – 24 months) and duplication of planning assessments. The Concept Plan is the most appropriate mechanism to affect the proposed revision to the site's land use mix and masterplan layout.

Does the Council have the resources to assess and determine major projects?

We understand that Penrith Council does have the resources to deal with the Project, however as the CIV of the Project is in excess of \$100 million the application must be assessed and determined by the Minister.

Do council practices demonstrate that projects important to implementing Metro or regional strategies can be determined on their merits?

Yes.

Criteria B – Facilitate Housing or Job Growth

Will the development directly result in significant growth in housing choice?

Yes. The Project will deliver close to 650 new dwellings located close to retail, transport and recreational facilities. The project will substantially increase the housing choice for Penrith by offering a more urban, vibrant, mixed use community. It is envisaged that 3% of the apartments will be provided as affordable housing.

Will the development directly result in permanent jobs in the area?

Yes. The Project is expected to generate some 400 permanent retail and 550 construction and equivalent full-time jobs.

Is the development in a centre identified in the Metro Strategy or Regional Strategy?

Yes, the site is located within the Penrith Regional City.

Criteria C – Transport accessibility

Is the development readily accessible to the railway, bus stop with frequent service, transit way station or ferry wharf? As an example within 800 metres from a station or transport node?

Penrith Station is approximately 1,000m from the site. It is also served by bus connections.

Criteria D – Improved Infrastructure

Will the development contribute a significant increase in public open space, additional foreshore access or improvements in the public domain?

Yes, as outlined in the previous VPA offer, the project will deliver substantial new infrastructure provision both on and off the site.

Criteria F – Local Council Issues

Would there be benefits in having an independent approval authority where the local council is a landowner or proponent for the project or are there other potential conflicts of interest issues?

We are unaware of the need for any independent approval authority. Penrith Council assessed and approved the Stage 1 DA.

6.0 KEY ISSUES FOR CONSIDERATION

The key environmental issues for consideration are as follows:

- Economic / Retail Impact
- Urban Design / Public Domain
- Residential Supply
- Permissibility
- Traffic and Transport
- Infrastructure Provision and Funding
- Residential Amenity / SEPP 65
- Design Excellence Strategy
- Construction Management
- Infrastructure and Services
- Contamination

These are discussed in more detail below.

6.1 Economic / Retail Impact

The proposed Masterplan, the subject of the Concept Plan, proposes some 11,600 m² of retail gross floor space on site, of which only 9,500m² is net leasable area. In assessing reviewing the PEA there are a number of factors that should be emphasised and which should be considered in the preparation of the Director General's Requirements:

- The site is not an 'out of centre' location. The site is recognised as being part of the Penrith Central Business District.
- Penrith has been designated as a regional city by the Metropolitan Strategy and Northwest Draft Subregional Strategy;

- The site immediately adjoins the Centro shopping centre which includes a supermarket and discount department store;
- The Penrith City Vision notes that there is 156,000 m² of existing retail floorspace within the Penrith City Centre and over the next 25 years it is anticipated that an additional 100,000 m² of retail floor space will be developed. Accommodating the proposed net leasable areas ~9,500² on the site will still enable sufficient growth to occur through the remainder of the CBD;
- The proposed retail facilities on the site will be characterised as a “Neighbourhood Centre”, which is generally comprised of centres with less than 10,000 m² of retail floor space comprising a supermarket and speciality stores. It is not uncommon for neighbourhood centres to form part of significant residential ‘brown field’ redevelopments.
- The trade area in which the Station Street Precinct is located in is growing with an annual growth of more than 1,700 persons or 0.7% over the period to 2021.
- A retail economic impact assessment has been prepared by Location Duanne. This report was prepared in respect of the October 2009 Concept Plan and was submitted to the Department of Planning. It is likely that an updated report will be prepared and submitted as part of any Environmental Assessment Report. Nevertheless the following findings of the report are relevant for the consideration of Revised Concept Plan:
 - there is a clear need for additional retail floorspace within the trade area in which the Station Street precinct is located;
 - the proposed retail floorspace will not threaten the viability or continued operations of any centres;
 - existing facilities elsewhere in the Penrith CBD, particularly Westfield Penrith Plaza and Centro Nepean are very busy during peak shopping periods; and
 - all major retail tenants within the defined main trade area are understood to trade at levels above the Australian average, reflecting the low provision of facilities, the wide region draw of retail floorspace in Penrith City Centre and the sizable population.

The Masterplan proposes the reduction of commercial floor space across the site. It is unlikely that commercial development on the site would ever be viable and the Stage 1 Development Approval for 20,000m² of commercial development creates a false capacity on the site which is unlikely to ever be met. The reduction in commercial floor space on the site will have a minor impact on the commercial capacity of Penrith, with adequate supply (of both land and floor space) to accommodate the future demand for commercial development within the CBD core area.

6.2 Urban Design / Public Domain

The heights of buildings has been analysed to achieve an urban design outcome which balances the role of the site as a ‘key site’ within Penrith city, in the context of its emerging regional role and also taking into account the residential uses of the site have also been selected to be commensurate with building types generally found in the Penrith market.

A hierarchy of streets and public spaces have been established to address surrounding land uses and means of access into and from the site.

The introduction of more significant retail landuses on the site has been considered from an urban design and public domain perspective. By providing for residential uses above the retail component and the provision of underground carparking, the urban design issues often associated with the provision of significant retail spaces can be addressed and mitigated.

The Environmental Assessment Report prepared which will accompany the Concept Plan will include a full urban design assessment to justify the proposed Masterplan.

6.3 Residential Supply

The proposed Masterplan, the subject of the Concept Plan, proposes a dwelling yield of some 650 dwellings which is a reduction from the 1,200 dwellings within the Stage 1 DA approval. Following market testing by Parkview, the approved Stage 1 DA proposed a dwelling density that is not marketable for the locality and therefore instigates a false capacity that will never be achieved on the site. The amended dwelling density will produce a housing form that is better catered to the location and demographic within Penrith.

Although the proposal reduces the residential density on the site, the proposed residential density will achieve 83 dwellings per hectare, which is consistent with densities achieved in other major brown field redevelopments, such as Breakfast Point's density of 56 dwellings per hectare.

The site has been designated by the Penrith City Vision and associated planning documents as a high density residential precinct. The Vision document in particular notes the following:

This precinct comprises the former industrial site, which is unique given its location in the city centre, size and that it is under a single ownership. The site forms the southern gateway to the city centre, and is identified as a key site under the Plan. The redevelopment opportunities of this precinct should result in a wide range of housing types at a density similar to a highly urbanized city. Such redevelopment needs to clearly address the interface with the much lower residential environment abutting its eastern boundary and to a limited extent, its southern boundary. Its proximity to services and facilities including transport nodes makes it ideally placed to encourage opportunities for live-work environments and affordable housing. It is envisaged that this precinct will be primarily residential in landuse, there will be opportunities for a range of commercial and retail uses to be located here, adjacent to the City South (mixed use) precinct.

The proposed residential density will continue to be consistent with high density residential development forms, and therefore the Penrith City Vision for the site.

The reduction in dwelling yield from the approved Stage 1 DA is equivalent to only 2% of the overall 2031 housing target applied to the Penrith LGA within the Draft North West Subregional Strategy (25,000 additional dwellings) and will have a minor impact on Council's ability to reach their housing target over 25 years.

In addition, the amended dwelling design will continue to provide housing variety and diversity on the site within a density suitable for the Penrith Regional Centre.

6.4 Permissibility

In accordance with the R4 High Density Residential zone, all of the proposed development is permissible on the site, with the exception of the 54 duplex dwellings and the retail premises in excess of 3,000m² floor space (as identified as the retail floor space limitation within Schedule 1 of the Penrith CBD LEP).

6.5 Traffic and Transport

The Concept Plan will be accompanied by a Traffic Assessment prepared by a specialist traffic consultant. Specifically the assessment will look at:

- Site access and road layouts;
- Retail servicing;
- Onsite parking requirements;
- Basement configuration and design;
- Impact of generated traffic upon the surrounding road network and intersections; and

- Opportunities to encourage public transport usage.

The development is of a size and nature that will require referral to the RTA pursuant to the provisions of Schedule 3 of *State Environmental Planning Policy (Infrastructure) 2007*.

6.6 Infrastructure Provision and Funding

As part of the Stage 1 DA, Parkview offered to enter into a Planning Agreement under Section 93F of the EP&A Act with Penrith Council. The terms of the VPA offer covered:

- Construction and embellishment of on-site public open space;
- Construction of internal roads and parking areas;
- Pedestrian and cycleway connections within and around the site;
- Stormwater management works;
- Local intersection upgrades;
- External landscaping works to surrounding streets; and
- Other works (to be determined).

In addition, the VPA will cover the provision of affordable housing.

A revised VPA offer covering the above matters will be submitted with the Concept Plan application. As with the Stage 1 DA, the execution of the VPA will occur prior to any subdivision or building works occurring on the site. The finalisation of the VPA will include the preparation of a more detailed Infrastructure Delivery Plan (IDP) and a Public Domain Strategy (PDS) that will be prepared in consultation with Council.

6.7 Residential Amenity / SEPP 65 / BASIX

The application will include a SEPP 65 and BASIX assessment outlining how the proposed development will achieve the design principles of SEPP 65, the rules of thumb contained in the Residential Flat Design Code and BASIX.

6.8 Design Excellence Strategy

As part of the Stage 1 DA approval, an alternative design excellence strategy (to a design competition) was agreed to by the Department of Planning and Council. To this end, the following condition was placed on the Stage 1 DA consent:

“The proponent is to establish in consultation with Council and the Department of Planning a Panel of 5 recognised architectural firms to assess and provide urban design and architectural review for each stage of the development. This Panel shall be established prior to the submission of the first Stage 2 DA.

Blocks A and C which incorporate the two iconic buildings within the Masterplan will be subject to an architectural design competition in accordance with the Director General’s Design Excellence Guidelines. Council is willing to consider a building height of 8 – 14 storeys for Block A and 8 – 16 Storeys for Block C. The specific height will be subject to achieving Design Excellence as demonstrated by the Director General’s Design Competition process and compliance with Clause 26 of the LEP.”

The revised Concept Plan will adopt a similar approach to design excellence as that approved under the Stage 1 DA in respect of Stages 3 and 7.

The Concept Plan and detailed drawings prepared for the Stage 1 development works have been designed by Turner and Associates, who have designed a number of award winning high density residential and mixed use developments and masterplans including Silkwood, Surry Hills, Mondrian Apartments, Waterloo, Parkview Place, Homebush and the Green Square Town Centre master plan. Turner and Associates will also prepare the detailed drawing for the remainder of the development.

6.9 Construction Management

A Construction Management Plan will be submitted for the Stage 1 Development Works that will deal with the following issues:

- Demolition and construction staging;
- Noise;
- Air and water quality;
- Demolition and construction waste;
- Construction traffic management;
- Pedestrian safety; and
- Site management.

6.10 Infrastructure and Services

No major infrastructure service constraints were identified in the Stage 1 DA approval. The EAR will outline what services currently exist on the site and whether or not any services need to be augmented to accommodate the proposed development.

6.11 Contamination

Geotechnique carried out investigations of the site as part of the Stage 1 DA. The results of their assessment confirmed that:

- the analytes selected for analysis are either not present or present in the soils at concentrations that do not pose a risk or hazard to human health or the environment under the proposed land use; and
- there is no indication of contaminated groundwater or contribution of ground water contamination due to activities within the site prior to 2005, and the current uses are not considered to have contributed to ground water contamination

The soil sampling was limited to areas outside the existing buildings, and the soil beneath the buildings could not be tested. However, Geotechnique Pty Ltd was of the opinion that the likelihood of contamination beneath the buildings is low and soil sampling can take place after the demolition of the buildings.

For the purposes of a Stage 1 DA, the site was considered suitable for the proposed landuses. SEPP 55 will be addressed in as part of the Concept Plan application including a review of the findings of Geotechnique that were submitted as part of the Stage 1 DA.

7.0 CONCLUSION

We trust that this Preliminary Assessment is sufficient to allow the Director General to issue requirements for the preparation of the necessary Environmental Assessment.

Should you have any queries about this matter, please do not hesitate to contact the undersigned or Andrew Duggan on 9956 6962.

Yours faithfully



Bernard Gallagher
Director

Encl.

Attachment A Copy of Minister's Declaration (MP09_0192)

Attachment B Copy of Development Consent (DA08/0652)

Attachment C Proposed Concept Plan drawings prepared by Turner + Associates

Attachment D Quantity Surveyors Certificate prepared by Parkview



Hon Tony Kelly MLC
Minister for Planning
Minister for Infrastructure
Minister for Lands
Deputy Leader of the Government in the Legislative Council
Leader of the House in the Legislative Council

Mr Andrew Duggan
JBA Urban Planning Consultants Pty Ltd
Level 7, 77 Berry Street
NORTH SYDNEY NSW 2060

- 7 JUL 2010

Dear Mr Duggan,

REQUEST FOR DECLARATION OF MAJOR PROJECT, MIXED USE DEVELOPMENT, 164 STATION STREET, PENRITH (MP 09_0192)

I refer to your letter on behalf of Parkview Pty Ltd, requesting that your proposal be declared a Major Project to which Part 3A of the *Environmental Planning and Assessment Act, 1979* (the Act) applies.

I have formed the opinion that your proposal is development of a kind described in Schedule 1, Group 5, Clause 13 of the *State Environmental Planning Policy (Major Development) 2005* and is a Project to which Part 3A of the Act applies. I have also authorised the submission of a Concept Plan under Section 75M of the Act for the proposal.

I note your proposal continues to exceed the 3000m² retail floor space limit prescribed by the Penrith City Centre Local Environmental Plan 2008. My Department continues to raise concern that the amount of the retail component in this location has the potential to undermine the town centre. Further detailed analysis of the proposed retail floor space in this locality will need to be undertaken having particular regard to the State and local planning strategies for the locality.

My Department has also raised concern over the introduction of lower density housing types (duplexes) within this defined high density precinct, as this may impact on the ability to deliver Council's LGA dwelling targets. My Department will undertake a detailed analysis of the proposed dwelling types having particular regard to housing targets outlined within the regional strategy.

The concerns identified above will need to be fully addressed and appropriately justified in your Environmental Assessment (EA). The Director-General's Requirements (DGRs) for the proposal will require a Retail Economic Impact Assessment Report to be submitted. You may now apply to the Department to issue the Director-General's Requirements (DGRs).

Please note that Section 75E of the Act requires you to lodge a Major Project application with the Director-General. You should also include a Political Donations Declaration Statement with your application (if required).

If you have any further enquiries about this matter, I have arranged for Michael Woodland, Director, Metropolitan Projects to assist you. Michael may be contacted at the Department's Bridge Street Office on telephone number (02) 9228 6150.

Yours sincerely,

Tony Kelly MLC
Minister for Planning

DETERMINATION OF DEVELOPMENT APPLICATION

P E N R I T H C I T Y C O U N C I L

DESCRIPTION OF DEVELOPMENT

DA No.	DA08/0652
Description of development	Concept Masterplan for Staged Mixed Use Development and 6 Lot Torrens Title Subdivision

DETAILS OF THE APPLICANT

Name & Address	Davids Group 14 Kings Cross Road POTTS POINT NSW 2011
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NOTES

1. Your attention is drawn to the attached conditions of consent in Schedules A and B.

Schedule A: Refers to the Masterplan for the Staged Mixed Use Development.
Schedule B: Refers to the 6 lot Torrens Title Subdivision.
2. You should also check if this type of development requires a construction certificate in addition to this development consent.
3. It is recommended that you read the Advisory Note enclosed with this consent.

DETAILS OF THE LAND TO BE DEVELOPED

Legal Description: Lot 12 DP 234581
Property Address: 164 Station Street PENRITH NSW 2750

DECISION OF CONSENT AUTHORITY

In accordance with Section 81(1)(a) of the Environmental Planning and Assessment Act 1979, consent is granted subject to the conditions implementation in attachment 1.

Date from which consent operates 15 December 2008
Date the consent expires 15 December 2010
Date of Decision 18 December 2008

Please note that this consent will lapse on the expiry date unless the development has commenced in that time.

REVIEW OF DETERMINATION & RIGHTS OF APPEAL

1. The applicant may request Council to review its determination pursuant to Section 82A of the Environmental Planning and Assessment Act 1979 within 12 months of receiving this Notice of Determination.

You cannot make this request if the development is Designated Development, Integrated Development, or State Significant development.

2. The applicant can appeal against this decision in the Land and Environment Court within 12 months of receiving this Notice of Determination.

You cannot appeal if a Commission of Inquiry was held for the subject development application, or if the development is a State Significant Development.

3. Right of Appeal if the application was for Designated Development
If a written objection was made in respect to the Application for Designated Development, the objector can appeal against Council's decision to the Land and Environment Court within 28 days after the date of this Notice. The objector cannot appeal if a Commission of Inquiry was held.

If the applicant appeals against Council's decision, objector(s) will be given a notice of the appeal and the objector(s) can apply to the Land and Environment Court within 28 days after the date of this appeal notice to attend the appeal and make submissions at that appeal.

REASONS

The conditions in the attached schedule have been imposed for the following reasons:

- To ensure compliance with the terms of the relevant Planning Instrument.
- To ensure that no injury is caused to the existing and likely future amenity of the neighbourhood.
- Due to the circumstances of the case and the public interest.
- To ensure that adequate road and drainage works are provided.
- To ensure that satisfactory arrangements are made to satisfy the increased demand for public recreation facilities.
- To ensure that access, parking and loading arrangements will be made to satisfy the demands created by the development.
- To ensure the structural integrity of the development.
- To ensure the protection of the health and safety of the occupants of the development.

POINT OF CONTACT

If you have any questions regarding this consent you should contact:

Assessing officer	Peter Wood
Contact telephone number	(02) 4732 7577

SIGNATURE

Name	Peter Wood
	Development Assessment Co-ordinator
Signature	

For the Development Services Manager

SCHEDULE A – MASTERPLAN CONDITIONS OF CONSENT

General

- 1 The development consent is based on the assessment of the following plans together with all accompanying documentation that supported the Statement of Environmental Effects provided by Don Fox Planning Consultants dated 24/6/08.

The development must be implemented substantially in accordance with the following plans, the application form and any supporting information received with the application, except as may be amended by the following conditions.

Plans – Turner & Associates

DA11	-	Version C dated 10/11/08
DA12	-	Version C dated 10/11/08
DA13	-	Version C dated 10/11/08
DA14	-	Version E dated 10/11/08
DA20	-	Version B dated 10/11/08
DA21	-	Version A dated 10/11/08
DA22	-	Version A (Revision C) dated 21/11/08
DA23	-	Version A (Revision C) dated 21/11/08
DA24	-	Version A (Revision C) dated 21/11/08
DA25	-	Version A (Revision C) dated 21/11/08
DA26	-	Version A (Revision C) dated 21/11/08
DA27	-	Version A (Revision C) dated 21/11/08
DA28	-	Version A (Revision C) dated 21/11/08
DA29	-	Version A (Revision C) dated 21/11/08
DA30	-	Version A (Revision C) dated 21/11/08
DA31	-	Version B dated 10/11/08
DA32	-	Version B dated 10/11/08

DA000 – DA005 - Version A dated 13/6/08

DA00	-	Version C dated 10/11/08
DA01	-	Version E dated 10/11/08
DA02	-	Version C dated 10/11/08
DA03	-	Version C dated 10/11/08
DA04	-	Version C dated 10/11/08

Landscape – Aspect Studios

Drawing 28024

SK01	-	Revision E dated November 2008
SK02	-	Revision D dated November 2008
SK03	-	Revision E dated November 2008
SK04	-	Revision F dated November 2008
SK05	-	Revision A dated November 2008
SK06	-	Revision F dated November 2008
SK07	-	Revision E dated November 2008
SK08	-	Revision E dated November 2008
SK09	-	Revision E dated November 2008
SK10	-	Revision E dated November 2008
SK11	-	Revision B dated November 2008
SK12	-	Revision C dated November 2008

SK13 -	Revision E dated November 2008
SK14 -	Revision D dated November 2008
SK15 -	Revision D dated November 2008
SK16 -	Revision E dated November 2008
SK17 -	Revision E dated November 2008
SK18 -	Revision E dated November 2008
SK19 -	Revision E dated November 2008
SK20 -	Revision B dated November 2008
SK21 -	Revision B dated November 2008

- 2 This Development Consent relates to Stage 1 of the development only and has been issued under S80(4) of the EP&A Act. Separate development applications shall be submitted for the future stages of the development.

Stage 1 of the Consent approves in principle the following aspects of the Masterplan:

- Gross Floor Area
- Land Uses
- Building Heights and Envelopes
- Road Hierarchy and Access Points
- Open Space Network
- Development Staging

Subject to the completion of the Design Excellence process and as modified by the conditions of this Consent.

Key Principles

- 3 The following key principles are to be incorporated in the preparation of Stage 2 development applications for the site:
- Consistency with Penrith City Council's "Sustainability Blueprint for Urban Release Areas"
 - An economic impact assessment be submitted with all Stage 2 development applications to determine the public benefit of the proposal
 - 3% of future residential development on each allotment approved by this consent is provided as affordable housing for very low to low income households
 - A Security Management Plan must be submitted for the development applications that include the hotel and/or tavern facilities
 - All ground level public frontages to buildings are to be activated and provide a transition between public and private domain.
 - At least 80% of the local park (civic park) must receive winter sun between 9am and 4pm
 - The open space associated with the proposed childcare facility should be reorientated to the north to achieve more winter sun.
 - Buildings are designed for energy efficiency and green house gas reduction.

Design Outcome

- 4 The proponent is to establish in consultation with Council and the Department of Planning a Panel of 5 recognised architectural firms to assess and provide urban design and architectural review for each stage of the development. This Panel shall be established prior to the submission of the first Stage 2 DA.

- 5 Blocks A and C which incorporate the two iconic buildings within the Masterplan will be subject to an architectural design competition in accordance with the Director General's Design Excellence Guidelines. Council is willing to consider a building height of 8 – 14 storeys for Block A and 8 – 16 Storeys for Block C. The specific height will be subject to achieving Design Excellence as demonstrated by the Director General's Design Competition process and compliance with Clause 26 of the LEP.

Infrastructure Delivery

- 6 Additional traffic modelling being undertaken in consultation with Council and the RTA with respect to the following:
- Expected weekend traffic generation
 - Woodriff/Jamison and Station/Jamison roundabouts with a ten year growth under existing and signalised conditions
 - Potential upgrades to Ransley Street and Mulgoa Road intersection to maintain existing intersection efficiency

The outcomes of that modelling are to inform the preparation of the Infrastructure Delivery Plan, Planning Agreement and the agreement with the RTA required by this consent.

- 7 An Infrastructure Delivery Plan (IDP) is to be submitted to and approved by Council prior to the issue of a subdivision certificate or commencement of development on the site.

The IDP is to be prepared in accordance with and address the requirements of Council's "Sustainability Blueprint for Urban Release Areas". It is to identify all infrastructure, including roads, drainage, overland flow paths and other civil works, utility services, community, social, cultural and recreational facilities required to service the development.

The IDP is to provide an accurate costing of all necessary infrastructure and establish a delivery program that aligns and apportions the cost of required infrastructure with the staging of development.

The IDP will form the basis for development of a Planning Agreement to identify and fund the timely provision of necessary infrastructure.

- 8 A Public Domain Strategy (PDS) is to be submitted to and approved by Council prior to the issue of a subdivision certificate or commencement of development on the site.

The PDS is to be prepared in accordance with and address the requirements of Council's "Sustainability Blueprint for Urban Release Areas". It will define the look and character of the public domain.

The PDS is to incorporate design and management requirements for all streets, open spaces and parks. It is to include aims/objectives, design and character statements, a schedule of works including a Public Arts Program, delivery timeframes and the maintenance requirements for each element.

The PDS will inform the preparation of a Planning Agreement to identify and fund the timely provision of necessary infrastructure.

- 9 The applicant, or any person entitled to act on this consent is to enter into a Planning Agreement with Council pursuant with Section 93F of the Environmental Planning and Assessment Act, 1979. The Planning Agreement is to be consistent with the offer from Parkview Penrith Pty Limited dated 4 December 2008, to make development contributions towards the provision of public amenities and services identified by the applicant's offer and the Infrastructure Delivery Plan, Public Domain Strategy and Affordable Housing requirements of this consent. The Planning Agreement is to be

entered into prior to the issue of a subdivision certificate or commencement of development on the site.

- 10 Documentary evidence being submitted to Council, prior to the issue of a subdivision certificate or commencement of development on the site, to the effect that satisfactory arrangements have been made with the RTA and relevant Service Authorities for the delivery of road improvements, traffic management facilities, utilities and services generated by the Masterplan.

Community Safety

- 11 A Community Safety and Crime Prevention Strategy (CS&CPS) is to be submitted to and approved by Council prior to the issue of a subdivision certificate or commencement of development on the site. The strategy is to define a physical environment that enhances and improves community safety within the locality.

The CS&CPS is to be prepared in accordance with and address the requirements of Council's Sustainability Blueprint for Urban Release Areas. The strategy is to clearly identify how the principles of crime prevention through environmental design will be employed in the planning, design and development of the site, particularly in terms of:

- Providing opportunities for effective surveillance;
- The use of physical and symbolic barriers to attract, channel or restrict the movement of people through and around the site;
- Encourage community ownership of public spaces; and
- Space management of public places

- 12 A Social Impact Statement is to be submitted with each Stage 2 development application indicating how the specific development proposal has addressed the approved Community Safety and Crime Prevention Strategy.

Heritage

- 13 Evidence shall be provided that the Heritage Office has approved an exemption to the provisions of the Heritage Act for the excavation works. This shall be provided to Council prior to commencement of site works.
- 14 That a programme of archaeological test excavations be undertaken prior to site works commencing and after demolition of existing buildings to determine the likelihood of Aboriginal Archaeological deposits. The results of the program are to be submitted to Council and to inform the preparation of future Stage 2 Development Applications. Methods to manage findings such as the establishment of keeping places or interpretation plans are to be submitted with respective Stage 2 Development Applications.

Specific Requirements

- 15 A 3.6m landscaped setback shall be provided adjacent to the west of block F to enhance the urban design of the main north-south boulevard.
- 16 Dedication of appropriate splay corners at the intersection of Jamison Road & Station Street and at the intersection of Jamison Road & Woodriff Street will be required. Vehicle sight distances at intersections to comply with RTA requirements. The splay corners will impact on the proposed development.
- 17 All proposed public footpaths are to be contained within the public road reserve.
- 18 The existing aerial power lines in Jamison Road are to be relocated underground.

- 19 Shared cycle way/footpaths are to be provided in Station Street, Jamison Road and Woodriff Street and all public facilities are to be on public land.
- 20 The alignment of the Boulevard is to be widened to allow for a 3.5m wide carriageway where no kerbside parking is proposed and to enable access by service vehicles.
- 21 All off street car parking requirements shall comply with Council's Development Control Plan(s) applying to the site and AS2890. The development is to include the provision of suitable bicycle parking at safe and convenient locations within the site.
- 22 An overland flow flood study that addresses the 1 in 100 year storm event for the local catchment is to be submitted to Council for approval. The findings of that flood study are to inform the preparation of the required Infrastructure Delivery Plan and future Stage 2 development applications in relation to specific development proposals.

SCHEDULE B – SUBDIVISION CONDITIONS OF CONSENT

- 23 Subdivision of the site is to be substantially in accordance with Plan Reference No. 15666 dated 18/6/2008 prepared by Dunlop Thorpe and Company Pty Ltd submitted with the development application.
- 24 The plan of subdivision shall include a Restriction as to User in accordance with Section 88B of the Conveyancing Act over proposed Lot 6 prohibiting direct access to Jamison Road or Woodriff Street. The restriction as to user is to be created at no cost to Council. The restriction as to user shall nominate Council as the authority to release, vary or modify the restriction.
- 25 An easement for access is to be created over the proposed road through lot 6 in favour of proposed lot 5 in accordance with Section 88B of the Conveyancing Act. The easement is required to ensure safe and efficient access to proposed lot 5 in the event the Masterplan does not proceed.

The easement is to be created at no cost to Council. Council is to be the nominated authority to release, vary or modify the easement.

The easement will be extinguished upon dedication of the access arrangements as public road.
- 26 A splay corner at the intersection of Jamison Road and Station Street is to be dedicated to Penrith City Council, at no cost to Council. The width of the splay corner is to accommodate future pathways and cycles ways and is to be designed in accordance with Austroads Guidelines with regard to intersection site distances.
- 27 A splay corner at the intersection of Jamison Road and Woodriff Street is to be dedicated to Penrith City Council, at no cost to Council. The width of the splay corner is to accommodate future pathways and cycle ways and is to be designed in accordance with Austroads Guidelines with regard to intersection site distances.
- 28 All proposed public footpaths and cycle ways are to be contained within the public road reserve. If required, land is to be dedicated to Penrith City Council, at no cost to Council, to accommodate the proposed footpath/cycle ways and verge areas in Station Street, Jamison Road and Woodriff Street.
- 29 All services (water, sewer, electricity, telephone and gas) including the provision of service conduits and stub mains are to be installed within the proposed public roads before final inspection of the engineering works.

Prior to the release of the linen plan, the following service authority clearances shall be obtained:

- a Section 73 Compliance Certificate under the Sydney Water Act 1994 shall be obtained from Sydney Water. This is required prior to the issue of the Subdivision Certificate and
- a letter from Integral Energy stating that satisfactory arrangements have been made for electricity supply to all proposed allotments in the subdivision, including any necessary easements; and
- a letter from an approved telecommunications service provider that satisfactory arrangements have been made for underground telephone services to all proposed allotments in the subdivision, including any necessary easements.

These clearances are to be submitted to the Principal Certifying Authority.

- 30 Submission of the original Linen Plan and ten (10) copies.

All drainage easements, rights of way, restrictions and covenants are to be included on the linen plan.

All dedications of roads/drainage are to be undertaken at no cost to Penrith City Council.

The following information is to be shown on one (1) copy of the plan.

- The location of all buildings and/or other permanent improvements shall comply with any statutory boundary clearances or setbacks as defined by the Building Code of Australia and Council's resolutions.
- All existing services are wholly contained within the lot served and/or covered by an appropriate easement.

- 31 A Surveyors Certificate is to be lodged with the application for a Subdivision Certificate that certifies that all pipes and services are located wholly within the property or within appropriate easements and that no services encroach boundaries.
- 32 A Subdivision Certificate is to be obtained prior to the release of the linen plan of subdivision. The Subdivision Certificate will not be issued if any of the conditions in this consent are outstanding.
- 33 The Planning Agreement required by Schedule A of this Consent is to be entered into prior to the issue of a Subdivision Certificate

Peter Wood

Signature

For the Development Services Manager



22 March 2010

Parkview Penrith Pty Ltd
Lot 1, Pier 8 & 9
23 Hickson Rd
Walsh Bay, NSW 2000

Attention: Mr Matt Crews

RE: 164 Station Street, Penrith

I refer to your recent request for a preliminary estimate of costs for the purposes of nominating the Capital Investment Value (CIV) in accordance with the New South Wales Department of Planning guidelines for the redevelopment of the abovementioned site.

I have reviewed the latest sketch plans and area schedule provided by Turner Associates Architects, and have used previous infrastructure and landscaping details for a guide to the subdivision and design costs.

In accordance with the Departments guidelines which states;

*For the purposes of this clause, the **capital investment value** of a project includes all costs necessary to establish and operate the project, including the design and construction of buildings, structures, associated infrastructure and fixed or mobile plant and equipment (but excluding land costs and GST).*

I estimate the CIV to be in the order of **\$185,000,000**.

If you require any further information, please contact the undersigned.

Yours sincerely

George Michailou
Chief Estimator.

NSW

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PO Box R1779
ROYAL EXCHANGE NSW 1225
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QLD

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