



planning consultants

19 April 2016
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The Secretary
NSW Department of Planning and Environment
33 Bridge Street
Sydney NSW 2000

Attention: Jane Flanagan, Senior Planning Officer

Email: jane.flanagan@planning.nsw.gov.au

**Section 75W modification to DA 264-09-01
14-54 Dennistoun Avenue, Yennora
Yennora Distribution Centre**

Dear Jane

1.0 Introduction

DFP is assisting Stockland in relation to the Section 75W modification to DA 264-09-01 lodged with DPE on 8 December 2015 in relation to the demolition of Building 3 and the construction of a new Building 3 and provision of a new building to be known as Building 8A.

By letter dated 23 March 2016 to Stockland, you requested a response from Stockland to submissions raised following notification of the modification application. In that letter, you also requested further information in relation to certain aspects of the proposal. In addition, you have also forwarded a further request for information to Stockland by email dated 6 April 2016.

The comments raised in your letter, the submissions and the email dated 6 April 2016 are addressed below and in the attached information.

2.0 Submissions

The submissions fall into three discrete categories:

1. Public submissions
2. Agency submissions
3. Submission from Holroyd City Council dated 16 March 2016

The issues in each of these categories are addressed below:

2.1 Public submissions

Two submissions from members of the public were lodged in relation to the notification of the S75W application. The main issues raised in these email submission relate to operational noise and traffic noise.

On 11 February 2016, Stockland met on site with local residents to discuss noise control measures for proposed Building 8A. A copy of the response to the community consultative committee dated 3 March 2016 is included at **Attachment 1**.



That advice restated the building treatments that were recommended to be included in Buildings 3 and 8A to ensure the noise levels as specified in Condition 11 of Schedule 3 of the consent issued in relation to DA 264-09-01 are adhered to.

An acoustic assessment prepared by Atkins Acoustics was submitted with the S75W application. That assessment was prepared having regard to the noise levels as specified in Condition 11 of Schedule 3 of the consent and the EPA's Industrial Noise Policy (INP).

Noise controls assumed and adopted in the acoustic modelling, included:

- Extension of forecourt canopy (Building 8A) to approx. 12m;
- Underside of canopy (Building 8A) no greater than 6m above finished forecourt level;
- Acoustic lining underside of canopy (Building 8A);
- Precast concrete panels up to 2400mm above finished floor level (Building 3 and 8A);
- Roof cladding (Building 3 and 8A) to incorporate insulation blanket and heavy duty thermofoil to achieve Rw 22 or greater;
- The existing acoustic walls to the north and west of Building 8A not less than 8.4m above driveway and finished floor level (Building 8A);
- Permanent mobile plant operated onsite to be fitted with low level or broad band 'quaker' reversing alarms.

These measures have been included on the architectural plans and will therefore be installed during construction of the buildings.

Table 7 of the acoustic report submitted with the S75W application (Appendix 7 to the planning report) shows the results of the noise predictions for the envisaged activities associated with the operation of Building 3 and Building 8A as well as the increase in cumulative noise from site activities.

Section 2.6 of the acoustic assessment specifies the measures and controls that may need to be implemented in order to satisfy the targets specified in condition 11 if noise created by the final operational activities exceed those used for the purpose of noise modelling and exceed the targets specified in condition 11.

In addition, Stockland has lodged a development application (DA) with Holroyd Council which proposes to reuse the material from the earthen mound in the location of where Building 8A will be constructed to provide a 300m long acoustic mound along the Dennistoun Avenue frontage of the site to the east of Gate 2. Council has advised that they have completed their assessment of DA 2015/630 and an approval for this work will be issued shortly.

Acoustic advice was prepared by Atkins Acoustics in relation to the proposed mound. A copy of the acoustic advice lodged with the DA is included at **Attachment 2** to this letter.

That advice assessed the size and location of the mound and the improved noise amenity likely to be achieved by the provision of the mound. That advice concluded:

"Referenced to the NSW, SPCC, Noise Control (Data Sheet N1007), modelling has shown that the mound would provide noise reductions of up to 12.7dB. This reduction would be clearly noticeable for exposed residents on Dennistoun Avenue."

Accordingly, the provision of the acoustic mound along the Dennistoun Avenue frontage will result in improved acoustic amenity for surrounding residential properties.



2.2 Holroyd Council submission

The Holroyd Council submission raised a number of issues each of which is dealt with below. The issues raised in Council's submission are similar to those raised by Council in the pre lodgement meeting, the minutes of which were included at Appendix 3 to the planning report submitted with the S75W application. These issues have been addressed in the relevant S75W plans and reports, however it is not clear if these details have been provided to Council.

2.2.1 Development Engineering

Item 9 of the pre lodgement meeting minutes related to Development Engineering matters. The points in Section 9 of the minutes are identical to the points noted in Sections A, B and C of Council's submission dated 16 March 2016. Those points were addressed in a letter dated 22 July prepared by Richmond + Ross consulting engineers (refer Appendix 11 to the S75W planning report).

2.2.2 Traffic Engineering

Our response to each of the questions raised in relation to Traffic Engineering in Council's submission is provided below:

1. It is requested that a condition of approval be imposed requiring all car parking spaces to comply with the requirements of AS 2890.1:2004.
2. It is requested that a condition of approval be imposed requiring the gradient of the ramp to the loading bay to the south of Building 3 to comply with AS 2890.2:2009.
3. It is not clear where the discrepancy identified in Council's submission has arisen.

Table 2.1 of the Traffic Report prepared by Colston Budd Hunt and Kafes (CBHK) (Appendix 8 to the planning report submitted with the S75W application), identified the changes to the master plan approval that were proposed as part of the S75W application.

The original master plan included three buildings in the western precinct – Buildings 8A, 8B and 9. Of these, only Building 8B has been constructed to date.

The current S75W application proposes to 'replace' Building 9 (as shown on the approved master plan) with a new building – 8A. The building identified on the approved master plan as Building 8A is now proposed to be referred to as Building 8C. As there is no proposed change to the approved Building 8C as part of this S75W application, Building 8C is not included on the architectural plan.

Table 2.1 of the CBHK Traffic Report identifies that the areas of Buildings 3 and 8A will be 13,500m² and 9,100m², respectively. The areas comprise:

- In the case of Building 3:
 - 12,500m² of warehouse floorspace; and
 - 1,000m² of office floorspace.
- In the case of Building 8A:
 - 8,500m² of warehouse floorspace; and
 - 600m² of office floorspace.

These areas are consistent with the architectural plans submitted with the S75W application. The areas of the other buildings in the Western Precinct (being constructed Building 8B and approved but yet to be constructed Building 8C) are provided for contextual purposes only. The information in Table 2.1 demonstrates that the net increase in



floorspace as a result of the proposed amendments is 4,597m², the bulk of which comprises warehouse floorspace¹.

The original master plan was submitted with a traffic assessment which considered traffic generation based on full development in accordance with the master plan.

The Traffic Report submitted with the S75W application has considered the potential impacts of the traffic generation associated with the net increase in floorspace that will be provided as a result of the S75W application. The net increase in floorspace above that already assessed as part of the master plan, is 4,597m² as noted in paragraph 2.5 of the CBHK Traffic Report.

4. The increase in train movements has already been considered and approved by NSW Planning and Environment.
5. An analysis of the operation of intersections in the vicinity of the site was undertaken using the SIDRA program. A copy of the electronic SIDRA files will be submitted with this response. **Attachment 3** to this letter is a summary of the SIDRA files.

The proposed modifications would result in an increase in traffic using the surrounding roads of 5 to 10 vehicles per hour in peak times.

The SIDRA analysis found that all intersections would continue to operate at an acceptable level of service and the report concluded that there would be no noticeable effects on the surrounding road network.

Importantly, condition 25 of Schedule 3 of the master plan consent limits the number of heavy vehicle movements (two way) for the site to 1,450 movements per day. The imposition of that condition is recognition that the surrounding road network had sufficient capacity to manage that number of heavy vehicle movements. No modification to this condition is sought as part of this S75W application.

6. The above discussion responds to Council's concerns with respect to the capacity of the local road network.

With respect to impact on residential amenity, it is noted that no variation to the existing operation of traffic ingress to and egress from the site is proposed as part of this S75W application.

7. See discussion in point 5.
8. No change to traffic signs, linemarking or traffic devices on public roads is proposed or required.

2.2.3 Environmental Health

At the request of Council, as part of the DA for the acoustic mound, additional investigation was undertaken with respect to the suitability of the stockpiled material for reuse within the acoustic mound.

A preliminary contamination investigation of the existing stockpile was undertaken by Douglas Partners (DP) and a copy of the report dated 4 March 2016 detailing the findings of that investigation is included at **Attachment 4** to this letter.

Douglas Partners has concluded that the stockpile material is suitable for reuse on the site. The report recommends the following be undertaken during the construction phase with respect to the reuse of the stockpile material:

¹ The original master plan did not differentiate between warehouse floorspace and office floorspace



- Conduct additional sampling in accordance with NEPC (2013) and the NSW EPA sampling design guidelines, including further more detailed assessment of asbestos in accordance with the procedure outlined in NEPC (2013) and the WA Department of Health *Guidelines for the Assessment, Remediation and Management of Asbestos-Contaminated Sites in Western Australia*, 2009. On completion of the environmental sampling, a report must be prepared by a suitably qualified environmental consultant outlining the outcomes of the investigation and provision of management recommendations (if required); and
- Implementation of the management recommendations provided in the report.

The DP preliminary contamination assessment was submitted to Council who has advised that the information provided is satisfactory and the DA for the acoustic mound would be approved shortly. **Attachment 5** is email correspondence from Council to this effect.

2.2.4 Landscaping

We question the requirement to provide tree planting within the car park at the rate of one tree every five spaces as requested by Council. This seems an excessive requirement particularly given the nature of the activities on the site and the fact that the car parking is not immediately visible from the public domain.

The landscaping plans submitted with the application identify landscaping within the car parking areas. The landscaping proposed includes:

- 11 x *Casuarina glauca* (Swamp Oak) which have a mature height of between 8 – 20m
- 18 x *Callistemon pinifolius* (Bottlebrush) which have a mature height of between 3 – 4m
- 211 x *Kunzea ambigua* (Tick Bush) which can reach 5m in height.

Therefore, although not provided at 5 space intervals, it is considered that ample landscaping in the form of trees and medium height shrubs will be provided in the vicinity of the development.

The species selected for landscaping are native species included in the list attached to the Yennora Distribution Park plant list.

3.0 Agency Submissions

We have reviewed the submissions of the agencies and note that no objections to the proposed modification have been raised.

No objection is raised to the requirements of agencies being imposed as conditions of approval, if required.

4.0 NSW Department of Planning and Environment

The following is a response to the matters raised in your letter dated 23 March 2016.

4.1 Traffic Impacts

As discussed in Section 2.2.2 above, no variation to the approved number of heavy vehicle movements (condition 25 of Schedule 3 of the consent to DA 264-09-01) is being sought as part of this modification application.

The assessment by CBHK has considered the likely increase in traffic movements that will occur as a result of the proposed modification. This is the increase above that already assessed as acceptable under the approved master plan. CBHK has concluded that the modification would increase flows on surrounding streets by 5 to 10 vehicles per hour in peak times and *such minor increases would not have noticeable effects on the surrounding road network.*

Details regarding the audit of current heavy vehicle movements (two way) for the site can be submitted under separate if required.



4.2 Preliminary Contamination Assessment

A copy of the preliminary contamination assessment prepared by Douglas Partners is included at **Attachment 4** to this letter.

4.3 Management Plans

Your email dated 6 April 2016 requested a copy of any updated management reports be included with this response to submissions. Revised draft management reports relating to Schedule 3 Condition 46 (e) of the consent were submitted to the Compliance section of the NSW Department of Planning and Environment in March 2016. Stockland is awaiting the outcome of the Department's review prior to finalising these reports.

5.0 Conclusion

The purpose of this letter is address the issues raised in the Department's requests for additional information in relation to the S75W modification application lodged for DA 264-09-01. It is considered that this letter and the attachments to this letter provide sufficient information to address those concerns.

It is considered that all outstanding issues have now been addressed and look forward to receiving the determination for this application.

Should you have any questions regarding the matters discussed in this letter or any other questions pertaining to this application, please do not hesitate to contact Ellen Robertshaw of DFP on 9473 4903.

Yours faithfully

DFP PLANNING PTY LTD

A handwritten signature in black ink, appearing to read 'ER', is positioned above the name Ellen Robertshaw.

**ELLEN ROBERTSHAW
PARTNER**

erobertshaw@dfpplanning.com.au

Reviewed: _____

A handwritten signature in black ink, appearing to read 'D. Galt', is positioned above the 'Reviewed:' line.

Attachments

1. Copy of the response to the community consultative committee dated 3 March 2016
2. Atkins Acoustics assessment of acoustic mound submitted with DA 2015/630
3. SIDRA summary
4. Preliminary Stockpile Contamination Assessment by Douglas Partners, 4 March 2016
5. Email correspondence from Holroyd Council