

7 October 2025

Ms Penny White
Environmental Assessment Officer
Industry Assessments, Department of Planning Housing and Infrastructure
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Dear Penny

SSD 77020757 – OAKDALE EAST PRECINT 2 – ENVIRONMENTAL IMPACT STATEMENT – FAIRFIELD COUNCIL SUBMISSION

This letter responds to the Environmental Impact Statement (EIS) prepared by Goodman associated with the SSDA for of Precinct 2 of the Oakdale East Industrial Estate. Council has reviewed the EIS report and attached supporting documentation and provides the following comments on the EIS.

A. SUBMISSION

- 1. Development Control Plan Non compliances** –Table 3 – landscape setbacks control of the Oakdale East DCP requires minimum rear and front landscape setbacks to estate roads and Old Wallgrove Road. The EIS states there is a non-compliance with landscape setbacks however it is unclear from the EIS document and the landscape plan where this non-compliance relates to. In addition, warehouse 2B1 has a parking shortfall of 1 space. Council considers the parking non-compliance matter minor and raises no concerns.
- 2. Canopy Coverage and Pervious Area Requirements** – The landscape plan shows a mature tree canopy coverage of 5.41% for precinct 2. Council notes the requirement within the DCP for canopy coverage, including 10% of the lot to be covered by tree canopy (once mature) and this area excludes public roads and non-industrial lands. It is requested the landscape design be modified to show 10% mature canopy coverage can be achieved.
- 3. Flood Impact** - The flood impact assessment as described in flood assessment report for Oakdale East Industrial Estate Masterplan and Stage 2 Works – Addendum No. 2 (BMT, July 2023) shows that there are negligible off-site impacts in the 1%AEP flood level as a result of this development.
- 4. Detention Basins** - It is proposed that the site will be drained toward Basin C, the volume of which is 25ML. As such a societal and individual risk rating and consequence category assessment must be prepared and calculated in accordance with the NSW Dams Safety Act 2015. An operations & maintenance plan must be provided as part of the detailed design package. If the dam is declared under the NSW Dams Safety Act 2015, an emergency plan must also be provided. This same methodology must be implemented for all proposed detention basins at the site.

The detailed design should show and provide details for inlets and outlet protection for basins. The design must consider vegetation egress into piped outlets and how this should be avoided and maintained.

5. **Stream Erosion Index** - It is noted that the detailed design of the outlets from the basins will be undertaken in consultation with Council and include consideration of stream erosion index objectives to ensure that it meets the SEI of no greater than 2.0 and energy dissipation within the outlets to Reedy Creek will be addressed in detailed design. No detail has been provided on the outlet to Reedy Creek and what creek bank protection works are proposed. More detailed information is required in this regard during detailed design.
6. **Stormwater Management** - Details of gross pollutant traps (GPTs) and any bioretention systems that will be handed to Council as an asset must be provided at the detailed design stage. The applicant must ensure that maintenance access is considered as part of the detailed design. An operations and maintenance manual, along with maintenance cost estimate must also be provided.
7. **Unreasonable Noise and Vibration** - The warehouse, including operation of vehicles, shall be conducted so as to avoid unreasonable noise or vibration and cause no interference to adjoining or nearby occupations. Special precautions must be taken to avoid nuisance in neighboring residential areas, particularly from machinery, vehicles, warning sirens, public address systems and the like. In the event of a noise or vibration problem arising at the time, the person in charge of the premises shall when instructed by Council, cause to be carried out, an acoustic investigation by an appropriate acoustical consultant and submit the results to Council. If required by Council, the person in charge of the premises shall implement any or all of the recommendations of the consultant and any additional requirements of Council to Council's satisfaction.
8. **NSW Protection of the Environment Operations Act 1997** - The use of the premises shall operate in accordance with the *Protection of the Environment Operations Act (POEO) 1997*. All activities and operations carried out shall not give rise to air pollution (including odour), offensive noise or pollution of land and/or water as defined under the *Protection of the Environment Operations Act 1997*.
9. **Compliance with Air Quality Impact Assessment** - The applicant shall comply with all the recommendations outlined in the submitted Air Quality Impact Assessment prepared by SLR Consulting Australia, Rev V2.0, dated 21 May 2025, during construction and operation of the development.
10. **Compliance with Noise Impact Assessment** - The applicant shall comply with all the recommendations outlined in the submitted Noise Assessment prepared by RWDI Australia Pty Ltd, Ref RWDI#2201866.08, dated 21 May 2025, during construction and operation of the development.

11. **Air pollution and odour complaints.** - The development (including the operational phase), including operation of vehicles, shall be conducted to avoid unreasonable dust, odors and air pollution and cause no interference to adjoining or nearby occupations. In the event of a dust, odor or air pollution complaint received by Council, then the relevant person/body responsible for the development or premises will be required to prepared an odour/air quality impact assessment/investigation by an appropriate qualified consultant and submit the report to Council. If required by Council, the person responsible of the premises shall implement any or all the recommendations specified by the consultant and any additional requirements of Council to Council's satisfaction.
12. **Biosecurity and biodiversity aspects** - The landscape plan should follow the recommendations of the Fairfield City Biodiversity Strategy 2022. It is recommended that the landscape plan should reflect the plant communities that have been removed being Cumberland shale plains woodland and River-flat eucalyptus forest. See below extract from Section 4.3 of Council's biodiversity strategy.
 - Invasiveness: including native species that can be invasive e.g., avoid or limit planting of Mount Morgan Wattle, Cootamundra Wattle, Callistemon viminalis, including hybrids etc in proximity to waterways or natural areas.
 - Possible genetic hybridisation with similar native species, otherwise known as genetic pollution, development proposals should avoid nursery hybrids of threatened species that occur in the Greater Sydney Bioregion, such as Syzygium paniculatum and Grevillea juniperina.
 - Proximity to nearby or adjacent natural bushland areas e.g., ensure nursery hybrids of locally occurring native species are not planted within 100 m of natural areas.
 - potential use by specific native fauna for foraging or nesting e.g., provide specific habitat or food trees to support native fauna that are known to occur locally, or which could be encouraged to recolonise the area.
 - only local provenance plant stock should be planted in or adjacent to reserves, to complement existing vegetation. Provenance of plants to be of the Greater Sydney Bioregion plant species specific to Fairfield City Council LGA.
13. **Estate Road Dedication** - Clarification is required from the Applicant about when Estate Road 02 will be dedicated to Council as a public road and when parking restrictions would be installed on the Estate Road 02 to facilitate heavy vehicle movements into and out of the site as well as vehicle access along the Estate Road. The Applicant shall provide Council estimated timeframes regarding these matters.
14. **Traffic Conditions** - The following conditions shall be incorporated into the consent of the state significant development application:

- The internal site layout and all roads associated with the development site shall be designed and approved to the satisfaction of Council's Subdivision Team;
- Prior to the commencement of operation of the development, the Applicant must prepare an Operational Traffic Management Plan (OTMP) for the development. The OTMP shall:
 - be prepared by a suitably qualified person(s);
 - be prepared in consultation with Council;
 - include an hourly breakdown of the types of heavy vehicles (30m Super Quad-Quad B-Double vehicles, 26m B-Double vehicles, 20m Articulated Vehicles, 12.5m HRV,s 8.8m MRVs and so on) and their frequency accessing the site on hourly basis throughout the day; and
 - include an Operational Driver Code of Conduct.
- Prior to the commencement of construction of the Estate Road or implementing traffic management measures at/near the development site, the Applicant shall undertake a Road Safety Audit to the satisfaction of the relevant roads authority. The Road Safety Audit shall:
 - be prepared by Road Safety Auditor(s);
 - be prepared in consultation with Council;
 - demonstrate the estate road capacity is adequate for the intended design vehicles; and
 - Identifies and recommends corrective actions to eliminate or mitigate the identified risks.
- Prior to the issue of a Construction Certificate, a Construction Traffic Management Plan (CTMP) prepared by a suitably qualified person detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control shall be approved by Transport for NSW and Council.

15. Landscape Maintenance Document - A detailed Landscape Maintenance document/schedule should be put forward in support of this landscape plan to ensure the application has put forward a thorough maintenance proposal for the future of the estate and surrounding vegetation/landscape proposal.

16. Development Contributions – Fairfield Council's Local Infrastructure Contributions Plan applies to the site. Council will levy a Section 7.12 Indirect Contribution of 1% of the total cost of works, which must be paid prior to the issuance of a construction certificate. Should the project be staged a revised QS report should be provided for each stage of the development. Should construction be substantially delayed (greater than 12 months) prior to construction a revised QS report must be provided for the development works.

B. CONCLUSION AND RECOMMENDATION

Council notes minor non-compliances with the Oakdale East DCP specifically mature landscape cover. The landscape plan should be resubmitted to show how 10% mature canopy coverage can be achieved on the lot. In addition, the conditions recommended by Council officers above must be included in any consent should the DPH&I approve the SSDA.

Should you have any further questions you wish to raise in relation to this matter please do not hesitate to contact the undersigned on 9725 0215.



Patrick Warren
SENIOR STRATEGIC LANDUSE PLANNER