



9 October 2024

Chris Ritchie  
Director, Industry and Assessment  
Department of Environment and Assessment  
Locked Bag 5022  
Paramatta NSW 2124

Dear Chris,

**Request for Secretary's Environmental Assessment Requirements (SEARS) – Precinct 2, Oakdale East Estate**

We write on behalf of *Goodman Property Services (Aust.) Pty Ltd* (Goodman) to request the Department of Planning and Environment (DPE) to issue Secretary's Environmental Assessment Requirements (SEARS) for four (4) warehouses within Precinct 2, Oakdale East Estate, proposed for warehouse and distribution use (Precinct 2 SSD).

Goodman is a digital infrastructure company. Goodman owns, develops and manages high quality, sustainable properties that are close to consumers and provide essential infrastructure for the digital economy. This includes warehouses, large scale logistics facilities, data centres and business and office parks globally. Further information on Goodman's business details are provided below:

Goodman Property Services (Aust) Pty Ltd	
ABN	40 088 981 793
Address	The Hayesbery, 1-11 Hayes Road, Rosebery NSW 2018

Goodman Property Services (Aust) Pty Ltd is acting on behalf of the Land Owner **BGMG 14 Pty Ltd** (ACN 661 888 884) as Trustee for BGMG 1 Oakdale East Trust No.02 (ABN 11 615 099 311).

## Subject site

Precinct 2 is within the Oakdale East Industrial Estate (the Estate), located at 2 – 10 Old Wallgrove Road, Horsley Park (Lot 102 and 103 in DP 1268366), in the Fairfield local government area (**LGA**).

The Estate has a site area is approximately 62 hectares (ha) and is bound to the:

- **west** by Old Wallgrove Road;
- **south** by Burley Road;
- **east** by Reedy Creek; and
- **north** by the Warragamba Pipeline.

The Estate is located approximately 15 kilometres (km) west of the Parramatta CBD (Figure 1), and is zoned *E4 – General Industrial*.

Precinct 2 has a site area of 15.7 hectares (ha) and is in the southeastern corner of the Estate (refer Figure 2).

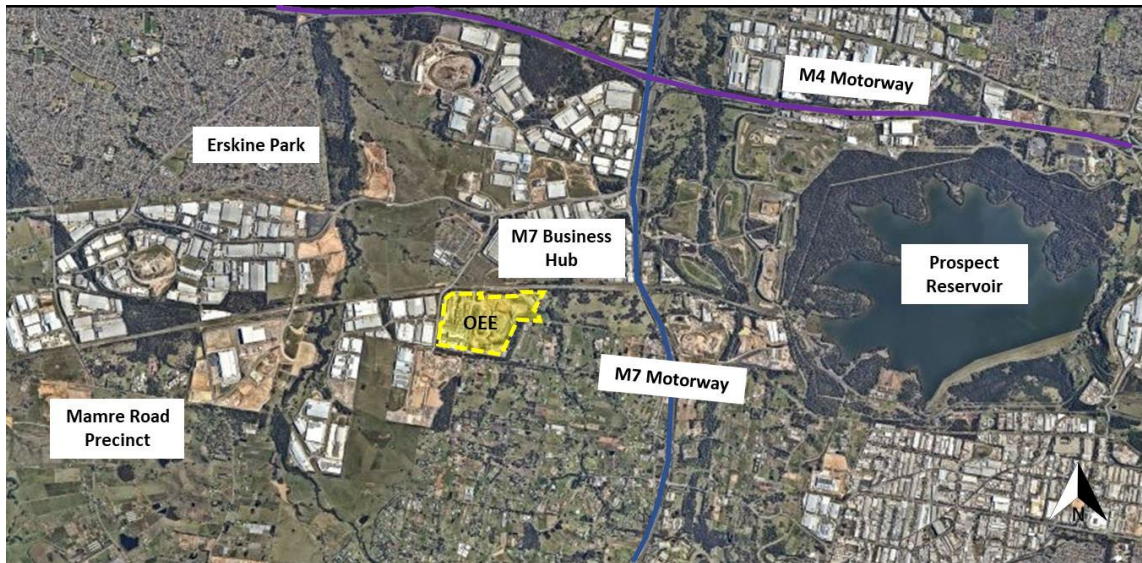


Figure 1 – The Estate context (Source: Keylan, Nearmap)



Figure 2 – Estate context, including Precinct 2 location (Base source: Nearmap)

## Background Approvals & Development Controls

1) **Rehabilitation DA:** On 2 August 2022 Fairfield Council approved a DA (**DA.347/2021**) for the historic rehabilitation of mining operations at the Estate:

- *Demolition of existing structures.*
- *Site remediation and rehabilitation works.*
- *Extensive cut and fill works to provide bulk pad levels suitable for industrial future development.*
- *Stormwater system suitable for industrial development including swales and detention basins.*
- *Clearance of approximately 2.26ha of vegetation.*
- *Retaining walls.*

This DA included approval of the pad levels for future warehouse development.

2) **Oakdale East Estate Development Control Plan (DCP):** The DCP was adopted by the Secretary of Planning and Environment on 16 September 2019, and came into force on 2 October 2019.

The DCP includes provisions related to rehabilitation, land clearing and the assessment of any proposed buildings and structures on the site. It includes controls related to design and landscaping, such as permeable site coverage and tree canopy cover.

3) **Concept Approval (SSD-37486043):** The Concept approval for the Estate was approved on 11 October 2023 for:

- *a Concept Proposal for an industrial estate to be built over five stages, including development controls; and*
- *a Stage 2 development for earthworks, intersection works, construction of estate roads and services, subdivision, noise barriers, biodiversity offsets and construction, fitout and operation of an expansion of an existing warehouse in Precinct 1 and three new warehouses in Precinct 3*

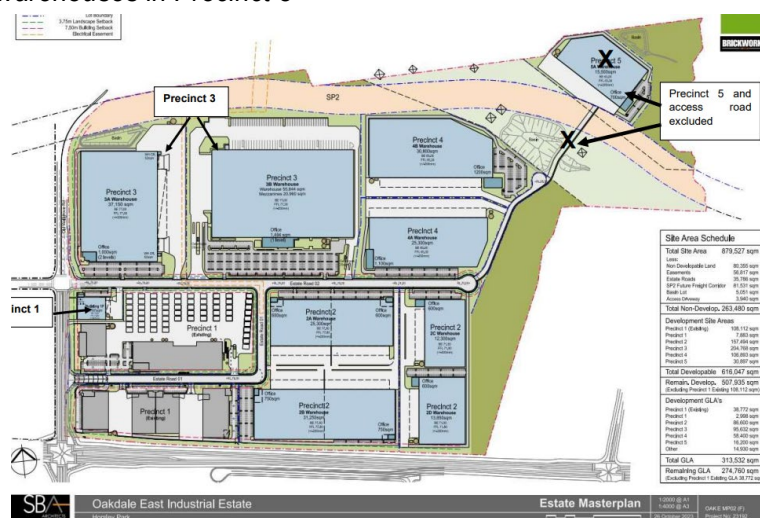


Figure 1: Concept Proposal Layout

Figure 3 – Approved Concept approval layout, SSD-37486043

The **Rehabilitation DA** approved site clearing and earthwork across the Estate, with the development pad levels, including for Precinct 2, approved in anticipation for future development. This consent considered all below ground characteristics, including contamination & remediation, flooding, geotechnical assessment, aboriginal cultural heritage impact and vegetation clearing.

The **Concept approval** included the following environmental assessment for the Estate (including Precinct 2), discussed in further detail below in section '*Consistency with Concept Approval (SSD-37486043)*' below, but includes:

- Visual Impact Assessment
- Flood Assessment
- Biodiversity and Bushfire Assessment
- Aboriginal Cultural Heritage
- Traffic Impact Assessment
- Noise and Air Quality Impact Assessment
- Social Impact Assessment and Community & Stakeholder Engagement

Condition A10 of the Concept approval includes development controls that apply to future development applications within the Estate, including Precinct 2. These include controls for building heights, setbacks, site coverage, tree canopy cover and car parking, and have been considered in the design of the Precinct 2 SSD development.

Part B of the Concept approval also includes '*Conditions For Future Development Applications*', which sets out requirements for future development at the Estate, including the Precinct 2 SSD:

- Development Contributions
- Development Controls
- Noise and Vibration
- Transport, Access and Parking
- Visual Amenity
- Stormwater Management
- Air Quality
- Hazards and Risk
- Bushfire Protection
- Water NSW
- Sydney water
- External Walls and Cladding

The Precinct 2 SSD will include a reference to, and compliance with, the Part B conditions in the EIS.

## The Proposal

The Precinct 2 SSD seeks approval for the staged construction and 24/7 hr operation of four (4) warehouses at Precinct 2 within the Estate, for *warehouse and distribution use*.

The proposal seeks to largely mirror the built form (footprints, building height, bulk and scale) proposed for Precinct 2 in Concept approval (refer Figure 4).

Concept approval Precinct 2 layout:

Proposed Precinct 2 layout:

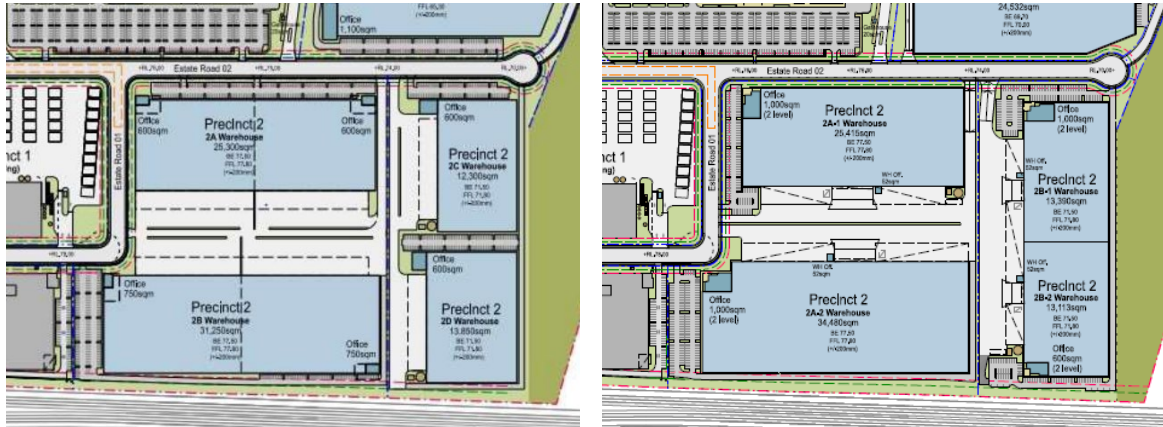


Figure 4 - Approved Concept / Proposed Precinct 2 layout

Key components of the proposed Precinct 2 development are:

- Staged construction and fit-out of four (4) warehouses for 24/7 hours warehouse and distribution use, with total GFA of 94,716sqm:

Warehouse	Total GFA (sqm)	Warehouse GFA (sqm)	Office GFA (sqm)
2A-1	26,197	25,415	1,052
2A-2	35,532	34,480	1,052
2B-1	14,442	13,390	1,052
2B-2	13,765	13,113	652
Other	4,780	-	-
<b>Total</b>	<b>94,716</b>	<b>86,398</b>	<b>3,808</b>

- Building height of 15m excl. solar panels
- 445 car parking spaces
- Vehicle access and hardstand space
- Landscaping

The site is zoned E4 – General Industrial, which permits 'warehouse and distribution' use.

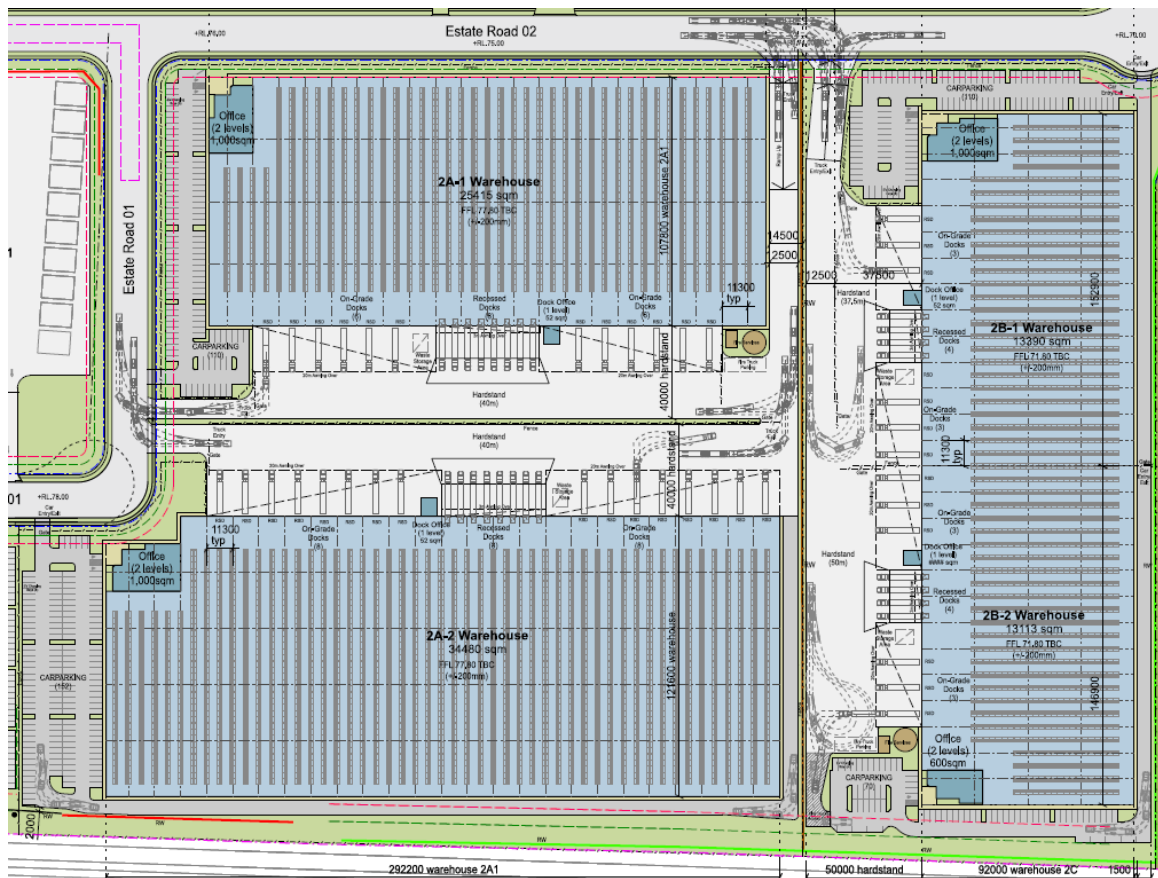


Figure 5 - Proposed Precinct 2 SSD layout

## Feasible Alternatives

The intention is for the Precinct 2 SSD development to maintain consistency with the Concept approval layout to avoid any hard stand and loading docks facing south and east towards the nearby residential receivers. For this reason, no feasible alternatives have been considered appropriate.

## State Significant Development

The proposal is for multiple *warehouse and distribution centres*, which is considered State Significant Development (SSD) under Schedule 1 clause 12 of *State Environmental Planning Policy (Planning Systems) 2021*:

### 2 Warehouses or distribution centres

- (1) Development that has an estimated development cost of more than the relevant amount for the purpose of warehouses or distribution centres (including container storage facilities) at one location and related to the same operation.
- (2) This section does not apply to development for the purposes of warehouses or distribution centres to which section 18 or 19 applies.

(3) *In this section—*

*relevant amount means—*

- (a) *for development in relation to which the relevant environmental assessment requirements are notified under the Act on or before 31 May 2023—\$30 million, or*
- (b) *for any other development—\$50 million.*

It is noted that the \$50 million threshold relates to a 'single operation' (interpreted as a single warehouse). A Quantity Surveyor's initial cost assessment (QS) has been prepared by RLB (**Appendix B**) to confirm the estimated development cost of the proposal.

Warehouse 2A-2 of the development has an anticipated cost of **\$55,510,956**, meeting the \$50 million threshold.

An SSDA application is proposed to be lodged under section 4.38 of the Environmental Planning and Assessment Act 1979 (EP&A Act), for assessment as SSD.

DPHI are requested to issue SEARs under section 4.12 of the EP&A Act and Clause 3 of Schedule 2 of the Environmental Planning and Assessment Regulation 2021 that will enable the preparation of an Environmental Impact Statement (EIS) for the proposed development.

## Consistency with Concept Approval (SSD-37486043)

The Concept approval included cumulative environmental impact assessment for the entire Estate, including Precinct 2, and set an appropriate framework for future DA assessment within the Estate - refer above discussion on Part B conditions of Concept approval conditions. The Part B requirement precludes the need for re-assessment already undertaken in the Concept approval, including the following.

### Architecture Plans

Condition A8(b) included the following requirements for Precincts 2:

*"The position, layouts and footprints of the buildings on these lots must be assessed by separate DAs and must satisfy the requirements in Part B of this consent. Building layouts in Precinct 2 must ensure loading docks face away from neighbouring residences.*

The Precinct 2 SSD built form and building footprints largely mirror that as shown in the Concept approval, with all loading docks facing away from neighbouring residences. The visual and noise impacts of Precinct 2 SSD will therefore remain largely consistent with the Concept approval.

### Civil Plans

Civil plans approved under the Concept approval approved pad levels of BE71.50 for Precinct 2A & B, and BE77.50 for 2C & D. The Precinct 2 SSD seeks to maintain these approved pad levels.

## Flood Assessment

Flood Assessment undertaken by BMT (dated 8 June 2022) for the Concept approval included flood assessment for both the Masterplan and Stage 2 works across the Estate. This included modelling of the Baseline Scenario (i.e. pre-development conditions) and Developed Scenario (i.e. post-works conditions) and associated flood behaviour for the 5% AEP flood, 1% AEP flood and PMF.

The assessment considered the proposed pad levels for Precinct 2, and concluded that for the Developed Scenario, most of the Site and all of Precinct 2 is outside the 1% AEP flood extent and reduced extent of inundation is predicted relative to the Baseline Scenario.

## Traffic Impact

The proposal's GFA remains generally consistent with the GFA anticipated in SSD-37486043 for Precinct 2, the cumulative trip generation remains generally consistent:

TABLE 14 OAKDALE EAST ESTATE OVERALL TRIP GENERATION – PRECINCTS 1 TO 5	
Period	Vehicle Movements
AM Peak Hour	546
PM Peak Hour	485
Daily	7,371

The proposal seeks parking consistent with the parking rates approved in SSD-37486043 - Warehouse: 1 space per 300m<sup>2</sup> and Office: 1 space per 40m<sup>2</sup>.

## Noise

Noise assessment undertaken by RDWI (dated 8 June 2022) for the Concept approval included cumulative operational noise assessment for the Estate, including Precinct 2. The assessment included cumulative acoustic impact of the full operation of the Estate including Light and Heavy vehicle movements, forklift movements and all lots mechanical operation. The assessment concluded:

- *“The operation of full development of the OEE is predicted to comply with the operational noise criteria during the day, evening and night time periods with the inclusion of two small noise barriers along the southern boundary.*
- *It is proposed for noise barriers to be installed, following the confirmation of design of the buildings within Precinct 2 and 4, and prior to operation of Precinct 3 to ensure compliance.*
- *An assessment of potential sleep disturbance has been undertaken considering heavy vehicle brake releases and reverse alarms. Sleep disturbance prediction indicate that noise impact would comply with the relevant guidelines.”*

The Precinct 2 SSD will include noise assessment and verification of noise impacts including noise barriers to ensure impacts to residences to the south and east are appropriately mitigated.

## Air Quality

A cumulative air quality impact assessment was prepared by SLR for Concept approval (dated June 2022) which concluded:

*“Operational phase emissions from the proposed OEIE masonry plant and warehousing operations would be a relatively minor contributor of air pollutant emissions compared to existing sources and would not be expected to adversely impact on air quality at the Stage 2 site.”*

## Contamination, Remediation and Geotechnical Assessment

The Rehabilitation DA approved the remediation and delivery of development pads at the Estate, including for Precinct 2. The assessment included geotechnical and contamination assessment, as well as a remediation action plan.

## Biodiversity Impact Assessment

A Biodiversity Assessment Report (BDAR) was prepared Ecologique (dated 8 June 2022) for the Concept approval, including Precinct 2.

The Rehabilitation DA approved vegetation clearing within Precinct 2, in anticipation for future development. There is no remnant vegetation within Precinct 2 requiring clearing approval under Precinct 2 SSD.

## Visual Impact Assessment

Visual impacts assessment was prepared by Cloustone Associates and Urbis (dated 21 April 2022 and 16 November 2022 respectively) for the Concept approval. The assessment included Precinct 2 built form and associated visual impacts from key vantage points, particularly to residential neighbours to the south and east:



Figure 6 - 'Location 10'

### Summary of 'Location 10' visual impact:

*“Highly filtered views of warehouse 2B will be possible from this location. As a result of no built-form currently visible within the visual scene, the addition of the warehouse, however highly filtered, will still be perceptible to viewers.”*



Figure 7 – 'Location VP1'

#### Summary of 'Location VP1' visual impact:

*"Notwithstanding that the approval and construction of warehouses in Precinct 2 would result in some view loss of open sky, overall, the level of view loss is considered acceptable based on the reasons provided above including for example, that the majority of the visual composition remains unaffected and that the proposed built form does not obstruct views of any scenic or highly valued icons or features, and overall, there is no substantive view loss."*

### Aboriginal Cultural Heritage Assessment Report (ACHAR)

Artefact Heritage prepared an ACHAR for the Concept approval, dated 1 July 2022. This included assessment over the Precinct 2 site area. The ACHAR concluded:

- *No sites listed on the Aboriginal Heritage Information Management System (AHIMS) were located in the study area*
- *The location of a site known as (REDACTED) within Survey Unit 1 of the study area was documented in previous archaeological investigations undertaken in 2018 and 2021.*
- *The location of (REDACTED) within Survey Unit 1 appeared not to have been disturbed since 2021.*
- *The study area within Survey Unit 2 was assessed to have nil to low archaeological potential because of it was within low-lying ground close to the creek that was prone to flooding*
- *The remainder of the study area had been assessed as having nil archaeological potential due to the mining activities undertaken there since the 1970s which have resulted in heavy disturbance to the ground.*
- *Consultation with RAPS has been completed and feedback recorded in the final report*
- *The site officer of the Deerubbin LALC did not identify any cultural values apart from those associated with (REDACTED)*
- *The archaeological values of the study area are associated with (REDACTED)*
- *[(REDACTED)] should be protected from any impact occurring from the development*

As an ACHAR was prepared with appropriate Aboriginal consultation undertaken.

## Bushfire Assessment

A bushfire impact assessment was prepared Blackash Bushfire Consulting (dated 6 June 2022) for the Concept approval. This assessment identified a bushfire protection zone along Precinct 2’s eastern boundary, adjacent to the riparian corridor. The recommendations in this assessment will be implemented in the Precinct 2 SSD



### Asset Protection Zone



-  Asset Protection Zone (maximum)
-  Asset Protection Zone (minimum 22m)

Figure 8 - Asset Protection Zone (Blackash)

Table 3: APZ Assessment – Precinct 2.

Direction	Slope	Vegetation	Flame Zone Width	APZ Proposed
North	NA	No hazard	Nil	NA
East	Level	Forested Wetland	5-7 metres	>20 metres
South	NA	No hazard	Nil	NA
West	NA	No hazard	Nil	NA

## Social Impact

The Concept approval included a social impact assessment (Urbis, dated 27 May 2022). This assessment included consideration of cumulative social impacts from the Estate development, including jobs, heat island effect, noise and visual impacts to the surrounds. The assessment concluded:

*“Based on this assessment and the recommendations provided, it is expected that the proposal will have an overall low positive impact on the local community.”*

The proposed Precinct 2 SSD development remains consistent with the Concept approval and outcome of the Urbis social impact assessment, precluding the need for updated assessment.

## Community & Stakeholder Engagement

A Community and Stakeholder Participation Strategy (the Strategy) was prepared for the Concept approval (SLR dated May 2022). The Strategy included robust engagement with appropriate stakeholders including surrounding neighbours.

The Strategy's engagement with neighbours identified Precinct 2 development including built form and associated environmental impacts including traffic, noise, air quality and visual. No objections were raised by neighbours or received during Exhibition of the Concept approval.

As the proposed Precinct 2 SSD remains consistent with the Concept approval, no additional environmental impacts are anticipated.

## Key Issues

The EIS will be prepared in accordance with the SEARs and the legislative requirements defined under the EP&A Regulation. The EIS will outline recommendations to address any environmental impacts of the project to inform DPHI in its assessment and recommendation on the project.

While the proposal largely mirrors the building footprints, height and bulk and scale envisaged under the Concept approval, and therefore the visual, noise, air quality and traffic impact assessment will remain generally consistent with the outcomes of the Concept approval assessment. There are no additional environmental impacts beyond that considered in the Concept approval.

Impact to the rural residential uses to the south will be a key consideration for the Precinct 2 SSD.

## Conclusion

We trust that the above information is sufficient to enable the issue of SEARs for the proposed development. If you wish to discuss any aspect of this letter, please contact Guy Smith on 9230 7225.

Yours sincerely

A handwritten signature in black ink, appearing to read "Guy Smith".

Guy Smith  
Head of Planning, Goodman