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12 December 2024

Catriona Shirley
Senior Environmental Assessment Officer
NSW Department of Planning and Environment
Sent via email

Dear Catriona,

**RE: SUBMISSION ON STATE SIGNIFICANT DEVELOPMENT
APPLICATION: SSD-64383959 - 200 BEECH ROAD, CASULA.**

Meerlen Pty Ltd has prepared this submission letter as the landowners of the site at 2260 Camden Valley Way, Casula NSW 2170, which is legally described as Lot 1 in DP785164. The site and the asset are recognised as Crossroads Hotel. The submission relates to the proposed State Significant Development Application for the land at 200 Beech Road, Casula (SSD-64383959).

It is understood that LaSalle Investment Management (the applicant) submitted SSD-64383959 to the Department of Planning Housing and Infrastructure (DPHI) on 28 October 2024, seeking approval for the construction and operation of a multi-level warehouse and distribution centre. The application was on exhibition from 14 November 2024 to 11 December 2024. We are seeking consideration of the matters outlined in this submission as part of the assessment process.

We have reviewed the Environmental Impact Statement (EIS) and suite of exhibited documents available on the DPHI Major Projects website. The property owners have some concerns with the proposal as it relates to potential impacts on Crossroads Hotel. These include:

- The visual impacts in terms of view outlook from Crossroads Hotel.
- Hours of Operation
- Construction Impacts

These matters are discussed further throughout this letter. Whilst we do not object to the proposal we do wish to express some fundamental and important

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matters and we request that the DPIE consider our concerns in the assessment of this concept proposal.

Overview

Proposed Concept Development SSD-64383959

From reviewing the EIS and accompanying documents we understand that SSD-64383959 seeks concept proposal for:

- Demolition of existing buildings and structures on the Site;
- Infrastructure comprising civil works and utilities servicing;
- Construction of a multi-level warehouse facility with ancillary office offerings;
- Upper level access ramp;
- Heavy vehicle egress to Beech Road;
- Provision of solar panels;
- 186 on-site car parking spaces;
- Complementary landscaping;
- 24 hours per day, 7 days per week operations.

Relationship to Crossroads Hotel at 2260 Camden Valley Way

The landowners are particularly interested in SSD-64383959 given its proximity to the asset located at 2260 Camden Valley Way, Casula (known as 'Crossroads Hotel') which is immediately adjoining our asset. Crossroads hotel is two-storey building to the north-east of 200 Beech Road. The proposed development site (SSD-64383959) shares the boundary with the Crossroads Hotel (refer to figure below).

Figure 1 Crossroads Hotel and Relationship to SSD-64383959



Source: Nearmaps

Key Submission Matters

It is acknowledged that the concept proposal SSD-64383959 provides an acceptable response to the site and surrounding context for the most part and a largely robust development application package has been submitted. However, there are some concerns with the proposed landscape screening and visual impact in terms of impact its ability to adversely impact Crossroads Hotel. Further the 24 hour operation of the development and the proposed construction activity is likely to have adverse implications on the site. These key matters are discussed in further detail in the subsections below. Where suitable, recommendations or requests have been put

Visual Impacts

We have reviewed the Visual Impact Assessment (VIA) prepared by Geoscapes, which accompanies SSD-64383959. The VIA establishes eight

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viewpoints within the surrounding public domain areas and utilises existing photographs and

photomontages to analyse these viewpoints. The viewpoints include one on Camden Valley Way, one on Cedar Road and the junction of Campbelltown Road and Hume

Highway, one on Crossroads Hotel, one on Mermaid Crescent, and two on Glenfield Road.

Following our review, we have determined that the proposed development does not adequately mitigate its visual impact on the Crossroads Hotel. The VIA assessment and analysis acknowledge that the view would be experienced by visitors to the

pub/restaurant and by individuals staying in some of the accommodation units facing the eastern boundary. The VIA concludes that, from that viewpoint, the magnitude of

change is judged to be high, indicating that the proposed development will be clearly visible, and the view will be notably altered by its presence.

Figure 2 Visual Impact of the Proposed Development on Crossroads Hotel



Picture 1 Baseline Photo

Source: Geoscapes

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Picture 2 Photomontage Year 15

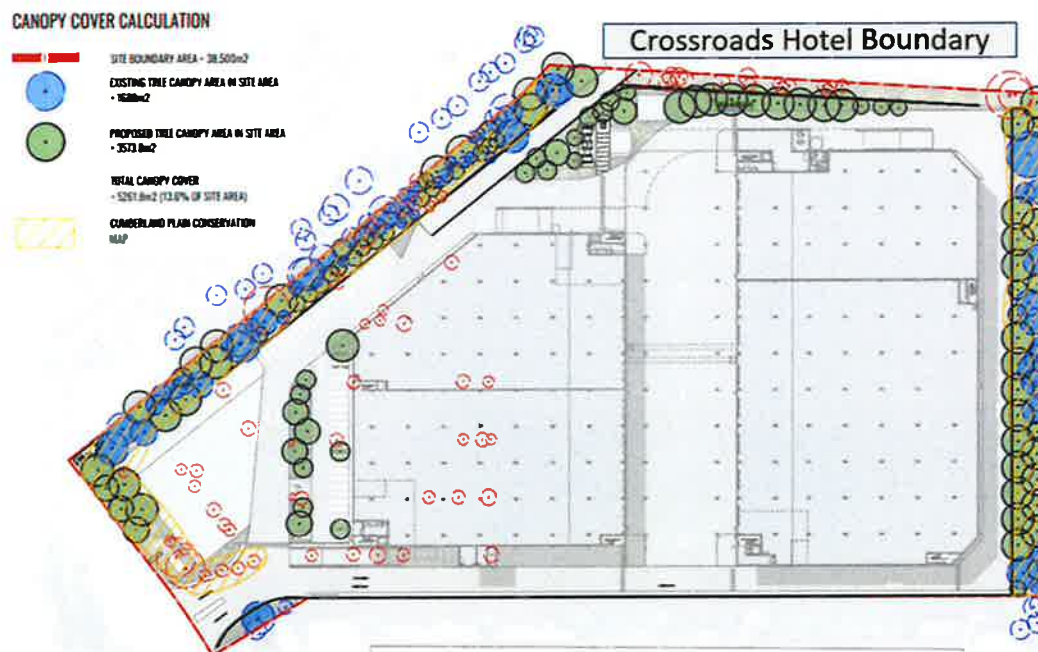
Source: Geoscapes

The Visual Impact Assessment (VIA) indicates that the "*proposed landscape planting along the eastern boundary of the development is expected to increase the vegetated screen and soften parts of the facade by Year 15.*" However, we believe that the proposed landscaping measures are insufficient in mitigating the visual impact, especially given the proposed height is non-compliant with the LEP. The landscaping plans (refer to Figure 3) illustrate a limited number of proposed tree plantings, which, based on the visual impact assessment, appear to be low level plantings. Any new plantings are not on the Crossroads Hotel boundary.

Furthermore, it is noted that some existing trees along the boundary between the proposed development and the Crossroads Hotel will be removed, thereby reducing the effectiveness of the screening for the proposed development.

The landscaping plans for the northeastern and north western boundaries of the proposed development include significantly more tree plantings, despite the visual impact in these areas being assessed as lower when compared to the visual impact at the Crossroads Hotel.

Figure 3 Proposed Landscaping Plans



Source: Geoscapes

Recommendations

To effectively minimise the visual impact on the Crossroads Hotel, we recommend that the proposed development incorporates more substantial and enhanced mature landscaping along the boundary. This is particularly crucial given that the proposed development exceeds height controls by 4 metres, exacerbating the visual impact.

Specifically, we suggest the following measures:

- **Increased Density of Plantings:** Implement a higher density of tree and shrub plantings to create a more robust vegetative screen.
- **Mature Plantings:** Utilize mature or fast-growing species to ensure quicker establishment and effectiveness of the visual barrier.
- **Vertical Greenery:** Consider the use of vertical gardens or green walls on the facade to further soften the visual impact of the building's height.

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Hours of Operation

We have reviewed the EIS prepared by Willowtree Planning and wanted to receive clarification on the proposed 24-hour operation given that the existing Crossroads Hotel includes a short stay accommodation component. We understand that the 24-hour operation of the proposed warehousing could bring rise to additional noise and other impacts and as such robust consent conditions should be imposed, if approved.

Construction

Whilst we understand that parking for workers during construction is to be contained wholly within the site, we want to ensure that robust consent conditions are imposed, if approved, to prevent any trucks, cars or workers from using the Crossroads Hotel carpark for parking purposes. Additionally, we want to flag that construction impacts must be managed to ensure there are no adverse effects, such as dust and other pollutants, that could impact the hotel's amenity and patron satisfaction.

It may be appropriate to have limited construction times, particularly after hours, given the overnight stay component of the hotel.

Noise and Vibration

The acoustic report and the EIS state that the construction noise and vibration impact identified that the noise levels at the Crossroads Hotel has the potential to exceed the noise management levels by 3dB.

Whilst DPHI would not be aware, the applicant has had pre lodgement discussions with Liverpool Council (and is soon to submit a Development Application) for an extension to the short stay accommodation that will be closer to the adjacent SSD boundary. Importantly this acoustic assessment has not considered the proposed scheme (as not yet lodged) and as such this noise impact may be more pronounced given the short stay accommodation will be closer to the boundary. We submit that given the construction period is up to 18months, this is not insignificant an impact on an operational Hotel with accommodation. The construction methodology or program should be amended so as the noise levels comply.

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Conclusion

This submission letter has been prepared by Nelson Simon Meers on behalf of the owners of Crossroads Hotel at 2260 Camden Valley Way, Casula in response to SSD-64383959 currently on exhibition.

We have reviewed the public exhibition documents associated with SSD-64383959. Further information has been requested to fully understand the extent of impacts associated with the proposal on Crossroads Hotel, along with further considerations of additional embellishment and screening on the eastern boundary of the proposed development.

Simon would welcome the opportunity to engage with the applicant or DPHI so they can further understand our concerns and would appreciate being notified of any future changes to the proposal.

In making this submission, we confirm that we have not made any political donations in accordance with Section 10.4 of the *Environmental Planning and Assessment Act 1979*.

We trust that the DPHI will consider this submission as part of the exhibition and overall assessment process. Should you have any queries regarding this submission letter, please do not hesitate to contact Simon (simon@sonnel.com.au).

Yours sincerely,



Nelson Simon Meers

CEO | Principal
Sonnel Hospitality
Meerlen Pty Ltd