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Contact: Andrew Mooney on 9725 0214

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Kate MacDonald
Team Leader
Department of Planning and Environment
Industry Assessments
GPO Box 39
SYDNEY 2001

Attention: Thomas Piovesan

**OAKDALE SOUTH INDUSTRIAL ESTATE, ERSKINE PARK, PENRITH
SSD 6917 – RESPONSE TO SUBMISSIONS**

I refer to the Departments correspondence dated 17 May 2016 regarding the Applicants Response to Submissions (RTS) prepared for the above State Significant DA for the Oakdale South Employment Lands (OSEL).

Fairfield Council's concerns in relation to this stage of the assessment process are as follows;

Visual Impact Assessment

The proponents RTS is accompanied by a Visual Impact Assessment (VIA), with the RTS classifying the extent of impacts on the surrounding area as generally low to moderate. It is also noted that s.4.3 (page 35) of the RTS includes the following comment;

"The potential visual impact of the proposal was the most frequently raised issue in the submissions received".

Given the above magnitude of concern, the assessment of VIA on Greenway Place is considered deficient and does not provide an adequate analysis of the extent of impacts on surrounding/nearby existing rural residential properties based on the following points;

- Greenway Place has a number of properties with westerly outlooks toward the OSEL. Only one perspective is provided (taken from street level) from a location in Greenway Place as the basis for assessing the visual impacts of the proposal on properties in the entire street.
- The location of the VIA in Greenway Place is taken from one of the lower points at street level and does not provide a true perspective of the scope of visual impacts of the proposal on the indoor and outdoor living areas of properties in Greenway Place which have significant sight lines toward both the OSEL and Blue Mountains.

- The vistas obtained from a number properties in Greenway Place toward the Blue Mountains and OSEL are at a higher RL than site shown in the VIA. In this regard the VIA misrepresents the extent of potential visual impacts on existing development in the area.

In this regard both the RTS and associated VIA have not provided a valid analysis of the visual impacts of the proposal on rural/residential properties located in Greenway Place.

This is compounded by basic and inexplicable errors in the RTS including reference to Greenway Place as site 7 in *Figure 10 – Identified OSE View Receptors* without any assessment for site 7 being provided in the accompanying *Table 7 - Summary of Visual Impacts*.

In this regard the advice included in the RTS and VIA cannot be relied upon as a suitable and reliable assessment of the visual impacts of the proposal on rural residential properties in Greenway Place. Accordingly the DP&E should require further analysis and seek further comments from Council and landowners in relation to this issue.

It is noted that in dealing with visual impacts for the Jacfin Employment Lands the DP&E required the proponents to undertake a far more detailed analysis of visual impacts that included assessment of impacts from primary indoor and outdoor living areas of a number of properties in Greenway Place. The DP&E also referred this assessment to an independent consultant for verification.

To ensure an equitable and consistent approach in the assessment of development proposals in the employment lands that have significant impacts on surrounding rural/residential properties, the revised analysis should not only be made available to affected properties but also be referred to an independent consultant for assessment.

Proposed Landscaped Buffer

Based on the findings of the VIA the proponents outline a range of a measures to mitigate visual impacts of the proposal including the provision of landscaping measures along sections of the southern and eastern boundaries of the site.

Given the above uncertainties regarding visual impacts (above) at this stage it is unclear whether the proposed screening measures (including the proposed density and potential height of planting) will adequately screen the development from nearby/surrounding properties.

It is also unclear what the final width of the proposed landscape buffer will be along the entire length eastern boundary of the site. The cross section of the proposed noise wall would appear to indicate the buffer will have a width of 10m at one point, however it is unclear on both the architectural and engineering plans whether a 10m buffer has been factored in the design and construction of buildings along the whole of the eastern boundary.

In this regard Council contends that the following steps and measures should be applied to the proposal;

- The applicants should be required to provide additional information (i.e. visual perspectives, photo montages) to demonstrate the proposed landscape buffer along the eastern and southern boundaries will provide effective screening to rural residential properties in the surrounding area including the properties located in Greenway Place.
- The final landscape buffer should be a consistent width (a minimum of 10m wide) and extend the entire length of the eastern boundary.
- The architectural and engineering plans should be amended to ensure that the provision of a 10m wide landscape buffer along the eastern boundary is factored into the design of the entire development.
- A vegetation management/maintenance plan should be prepared by Goodman to ensure the satisfactory establishment of vegetation in the landscape buffer and measures to ensure the longevity of plants and where required provision of replacement planting.
- Goodman should also provide details of arrangements to be put in place for responsibility of implementing the vegetation management and maintenance plan in the long run.

Glare and Lighting Issues

Council's original submission raised concerns in relation to the potential impacts of sunlight glare from reflective surfaces of the development on nearby rural/residential properties. It is noted that a number of submissions to the proposal also raised concerns in relation to the impacts of industrial lighting on these areas.

The RTS provides a glib and dismissive response to these issues and has not addressed the concerns raised. Relevant information needs to be provided including ameliorative measures to address the potential impacts of glare and industrial lighting on existing rural/residential development.

Council believes the Department will also not be in a position to finalise its assessment until this information has been made available for public comment.

Conclusions

Based on the above deficiencies with the RTS/VIA, glare/lighting impacts and uncertainty regarding the proposed ameliorative measures in the proposal, Fairfield City Council maintains its objection to the Oakdale Southern Employment Lands proposal.

The outstanding information that addresses the above issues needs to be referred to affected land owners and Council for comment before the DP&E can make a determination on the proposal.

If you have any enquires regarding the above please do not hesitate to contact the undersigned on 9725 0214.

Yours faithfully



ANDREW MOONEY
CO-ORDINATOR STRATEGIC LAND USE PLANNING