

NSW Department of Planning & Environment
 23-33 Bridge Street
 Sydney NSW 2000

Attention: Rebecca Sommer

Response to Submissions

State Significant Development Application (SSD 7500) Proposed Warehouse & Logistics Hub

5 & 9 Culverston Road, Minto (Lot 3 in DP817793 & Lot 400 in DP87511)

Dear Rebecca,

This Response to Submissions is submitted to the NSW Department of Planning & Environment (NSW DP&E) on behalf of Qube Logistics and relates specifically 5& 9 Culverston Road, Minto.

The proposal as submitted to NSW DP&E seeks consent for the construction and operation of a warehouse & logistics hub that will operate on a 24 hour, 7-day basis. The warehouse areas and respective hardstand is detailed below.

Development Particular	Staging		
	Stage 1	Stage 2	Stage 3
Warehouse	1A	1B + 1C	1D
Approximate Total GFA	Warehouse 1A Warehouse: 40,000sqm GFA Office: 2,000sqm	Warehouse 1B Warehouse: 22,000sqm Office: 1,000sqm Warehouse 1C Warehouse: 22,000sqm Office: 1,000sqm	Warehouse 1D Warehouse: 23,000sqm Office: 1,000sqm
Approximate Hardstand	6.9ha for storage associated with warehousing and logistics purposes		

The site is owned by Minto Properties and is located within an existing industrial precinct with strategic access to Sydney's key arterial road network. The proposal will retain the use of the site for employment-generating purposes by facilitating the operation of the site for the storage and distribution of freight. Accordingly the proposal will create employment opportunities and service businesses that operate on a local and national scale.

The site is located within the Campbelltown Local Government Area (LGA) and is identified within the IN1 General Industrial Zone pursuant to *Campbelltown Local Environmental Plan 2015* (CLEP 2015). The proposed development for a *Warehouse and Distribution Centre* is permissible with consent on the subject site and will be contextually appropriate given the existing industrial character of the site and its surrounds.

As part of the Environmental Impact Statement prepared by Willowtree Planning that was submitted in June 2016, the following matters were considered in detail:

- Strategic and Statutory Context;
- Traffic and Transport;
- Urban Design and Visual;
- Noise and Vibration;
- Soils and Water;
- Air Quality;
- Infrastructure Requirements;
- Greenhouse Gas and Energy Efficiency;
- Ecologically Sustainable Development;
- Waste;
- Contributions; and
- Mineral Resources

State Significant Development 7564 was exhibited from **15 June 2016** until **1 August 2016**. A total of nine (9) submissions have been received to date from the following agencies and landowners:

1. WaterNSW;
2. TransGrid;
3. RMS;
4. Transport for NSW;
5. Office of Environment & Heritage;
6. Campbelltown City Council;
7. NSW Department of Planning & Environment;
8. Department of Primary Industries; and
9. Endeavour Energy.

A response matrix is provided (refer **Table 1**) along with the following information which is annexed in support of the proposal:

- **Appendix 1** – Architectural Drawings & Landscape Plans
- **Appendix 2** – Traffic Impact Assessment (Addendum)
- **Appendix 3** – Flood Response
- **Appendix 4** – Phase 2 Investigation & Remediation Action Plan

Based on the information included in this response, it is evident that sufficient evidence is provided to support the proposal in the current form. It is kindly requested that this Response to Submissions Matrix is attached as part of the final Development Consent.

Should you require further information, please contact the undersigned.

Yours Faithfully,



Andrew Cowan
Director
Willowtree Planning Pty Ltd

Table 1: Response Matrix

Agency/Council	Response
1. WaterNSW	
a) <i>WaterNSW</i> <i>Thank you for your email regarding the exhibition of SSD 7500. WaterNSW can confirm that this proposal is not in proximity to any of our infrastructure, and is therefore of no concern to our organisation. Bow Bowing Canal next to the site is not under our ownership.</i>	The response of Water NSW is noted and agreed.
2. TransGrid	
a) <i>We can advise after review of the abovementioned SEARs Application using Transgrid's Asset Management Information System (TAMIS), this proposed development does not affect our infrastructure, therefore we do not object to this proposal. Please also find enclosed a Transgrid Plan identifying the subject site as per our records.</i>	The response of TransGrid is noted and agreed.
3. RMS	
a) <i>Reference is made to Department's email dated 10 June 2016, regarding the abovementioned application which was referred to Roads and Maritime Services (Roads and Maritime) for comments. Roads and Maritime has reviewed the submitted application and raises no objection to the proposal.</i>	The response of RMS is noted and agreed.

4. Transport for NSW

a) TfNSW provides the following comments and conditions for consideration in the assessment of the development proposal:

Construction Traffic Management Plan

The proponent should be conditioned to submit a Construction Traffic Management Plan (CTMP) prior to the commencement of any works on the site. The CTMP should be prepared by a suitably qualified person in consultation with Council and Roads and Maritime Services. The CTMP should outline the number of truck movements and routes as well as location of parking for workers and plant. It should specify any potential impacts to bus services, pedestrian, cyclists, traffic, road safety and parking and within the vicinity of the proposed site from construction vehicles during construction. Any potential impacts to pedestrian access or public transport infrastructure including bus stops should also be specified in the CTMP. The CTMP should include the cumulative construction impacts of all the projects adjacent to the site.

Travel Demand Management

The proponent should be conditioned to prepare a Workplace Travel Plan encourage non-car based transport. The Travel Plan should outline measures to encourage public and active transport trips including:

- *provision of bicycle parking and end of trip facilities for pedestrian and bicycle riders. These facilities could also provide amenity for heavy vehicle drivers;*
- *provisions of footpath and shared path within the site and along site frontages to provide connectivity, safety and accessibility for pedestrians and bicycle riders to existing and future networks and public transport facilities;*
- *other travel demand measures, where practicable, such as employee incentives, flexible work times and car share schemes.*

The conditions of recommended by TfNSW are accepted.

5. Office of Environment & Heritage

a) *OEH has reviewed the Flooding and Stormwater Assessment prepared by Arcadis (Assessment) dated April 2016. OEH understands that Campbelltown City Council has deployed its existing flood model to undertake a site specific assessment of the impacts of the proposal on regional flooding. This assessment has determined that the proposal does not affect existing flood behavior beyond the site. OEH further understands that the Campbelltown City Council model addresses the impacts of climate change due to the increases in rainfall intensities.*

OEH considers that the evacuation planning methodology as outlined in the assessment reasonable. OEH recommends that the concept drainage plan be confirmed at the detailed design stage, along with the evacuation plan.

Noted and agreed.

6. Campbelltown City Council

Planning Issues

a) *The proposed outdoor storage areas will not be adequately screened from public places (Culverston Road, Rose Payten Drive and the Main South Rail Line). This matter was raised with the applicant at the pre lodgment stage and it is evident that this matter, and the importance of this matter to the Council, has not been given the anticipated attention. Council strongly objects to any outdoor storage area that is not adequately screened. The relevant clauses of Part 7 of the Campbelltown Sustainable City DCP 2015 are listed below:*

i. *Outdoor storage areas shall not be located between the primary or secondary street boundary and any building on the allotment.*

In response to the matters raised by Council pertaining to the visual amenity of the site, an additional visual perspective is provided (drawing number 116101_A_SSD_10013 – see **Appendix 1**) has been prepared which demonstrates that sufficient planting is provided and separation is achieved to the boundaries of the site.

The relevant sections of Council's DCP are addressed as follows:

- i. *Outdoor storage areas shall not be located between the primary or secondary street boundary and any building on the allotment*

- ii. *Outdoor storage areas shall be adequately screened from public view.*
- iii. *Goods and materials stored shall not be stacked higher than an approved screening structure.*
- iv. *Screen fencing and structures shall be constructed of high quality materials that complement the buildings located on site.*
- v. *All outdoor storage areas shall be sealed and drained to the storm water system in accordance with any environmental management requirements.*

All screening structures shall be located behind the required landscaped areas. Specifically, landscaping fronting the Main South Rail Line and Rose Payten Drive shall be of significant height so as to obscure views of the site.

Council also requests clarification as to whether the outdoor storage area would be used to store containers, and if so, the height of such container storage. Council would not support more than two containers in height from natural ground level. Council also requests clarification of whether any loading and unloading of goods, or any other industrial activities would take place within these storage areas. All industrial activities should take place within the proposed buildings and not in outdoor / exposed areas.

Comment: For the purpose of this application and all development proposed on the subject site, Airds Road serves as the primary frontage. Culverston Road is currently subject to negotiation with Council to be closed and retained under private ownership.

Accordingly, the storage area is not located between the primary or secondary street boundary and any buildings, as all storage will be distinctly behind the proposed building line.

- ii. *Outdoor storage areas shall be adequately screened from public view.*

Comment: As shown on drawing 116101_A_SSD_10013 & 116101_A_SSD_A006, a setback in excess of 30m from the storage containers to the property boundary of the subject site adjoining the Southern Railway is provided. This area will consist of dense landscaped buffers and a 2.4m high powder coated fence. That screen screens the container stacks that will be a maximum of two containers high.

- iii. *Goods and materials stored shall not be stacked higher than an approved screening structure.*

Comment: As previously stated, container stacks are proposed to be a maximum of two containers high. This will be less than the 13.7m height of the proposed warehouse facilities, and in conjunction with the separation to the boundary, dense landscaping and powder coated fencing (2.4m high), the outdoor storage area shall not be visually dominant when viewed within the public domain or from surrounding properties.

- vi. *Screen fencing and structures shall be constructed of high quality materials that complement the buildings located on site.*

Comment: Powder coated palisade fencing (2.4m high) is proposed around the perimeter of the site, to ensure security and provide a clear delineation between public and private land. This fencing is considered to complement the industrial character of the site and intended land use, whilst setting a desirable precedent for future development within the locality.

Palisade fencing for a site of this scale, is also considered the most suitable treatment, given the extent of the lot dimensions. Overall, this will ensure that a degree of transparency is provided and passive surveillance to the street is achieved.

	<p>vii. <i>All outdoor storage areas shall be sealed and drained to the storm water system in accordance with any environmental management requirements.</i></p> <p><u>Comment:</u> All outdoor storage areas specified on the plans will be sealed and drained in accordance with the stormwater management strategy submitted with EIS.</p> <p>In addition the requirements outlined in Council’s DCP, the height of the proposed planting (at maturity) will be substantive to adequately screen development (and associated storage areas) on the subject site. All fencing will be setback 3m from the property boundary, and therefore shall provide sufficient area to accommodate landscaping of a suitable height and density in respect of the industrial land use.</p> <p>As discussed above, the storage area is proposed to accommodate container stacks (two high) which is consistent with Council’s requirements as the height shall not be greater than the 13.7m high warehouse facilities. Further and more significantly, there will be no loading/unloading of goods on the hardstand areas that are stored within the containers. Any activities of this nature will be contained within the warehouses.</p>
<p>b) <i>The front fencing to the development fails to comply with Part 7 of the Campbelltown Sustainable City DCP 2015:</i></p> <p><i>"All fencing in industrial developments shall be setback a minimum of 3.0 metres from property boundaries addressing a primary and/or secondary street."</i></p> <p><i>Council requests that the front fencing to the development be setback 3 metres and the area between the fencing and the property boundary landscaped, in accordance with Council's policy.</i></p>	<p>As shown on drawing 116101_A_SSD_A006, the proposed palisade fencing is to be setback 3m from the property boundary, thus enabling landscaping to be provided that can sufficiently screen the subject site. At maturity, the landscaping proposed, in conjunction with the substantive building setbacks, will provide a buffer that results in the scale and overall development area being portrayed as unobtrusive and commensurate with the industrial character of the locality.</p>
<p>c) <i>In the case that the development is approved, Council requests that a condition be imposed on the development consent, allowing Council to instruct the applicant to instate the "future" car parking shown on the plans, if a demonstrated car parking problem within the vicinity of the site becomes apparent. Failure to comply with such an instruction would be deemed a breach of the development consent.</i></p>	<p>Noted and agreed.</p>

<p>d) <i>Compliance with some of Council's landscaping standards could not be determined, as the landscape plan supplied lacks detail. Council requests a full landscape plan showing species, heights and pot sizes of all plants and trees. It is requested that compliance with the following landscaping standard be ensured:</i></p> <p><i>"The first three (3) metres of all required street front landscaped area (as measured from the street boundary) shall be planted of advanced canopy trees that are:</i></p> <p><i>i) a minimum of two (2) metres in height with a minimum 400 litre pot size at the time of planting;</i></p> <p><i>ii) of native species; and</i></p> <p><i>iii) planted /placed every 10 metres.</i></p>	<p>A revised Landscape Plan has been prepared by Ground Ink which provides planting details and species types that illustrates landscaping will serve as a sufficient visual buffer in and around the site (refer drawing No.1 LDA-001 dated 5.10.2016 prepared by Groundink).</p> <p>Typical plant schedules have been provided as follows:</p> <ul style="list-style-type: none"> ▪ Entrance and Culverston Road ▪ Northern buffer ▪ Western buffer ▪ Southern buffer <p>Sections have also been produced to provide a representation of the critical points of the site, and the height of the proposed plant species at maturity.</p> <p>It is considered that the proposed planting scheme provides a density of planting above and beyond that anticipated in the DCP and should therefore be supported by Council.</p> <p>The applicant requests flexibility with respect to landscaping along Culverston Road in the event it is closed and becomes a private road. Should closure proceed, FIt is nominated to provide a reduced width of landscaping along this frontage given the limited potential for it to be accessed and restricted use to the public.</p>
<p>e) <i>Each proposed warehouse requires a 100,000 litre rainwater tank (based on the size of the buildings' roof areas) in accordance with Part 2 of the Campbelltown Sustainable City DCP 2015.</i></p>	<p>Section 4.2 of the ESD Report submitted with the EIS (refer Appendix 19 of the EIS) confirms that:</p> <p><i>The site includes over 100,000m2 of roof area available for rainwater harvesting. Rainwater harvesting is to be explored during detailed design. Its size and implementation will be provided where practical and feasible</i></p> <p>Accordingly, such measures will be investigated following development approval to ensure the objectives and targets of the Sustainability Management Plan are met.</p>
<p>f) <i>Clarification is requested as to whether the approved rail siding at the subject site will be constructed.</i></p>	<p>The approved rail siding has been previously activated, however it is not prosed to form part of the subject application. The land owner, may at some point in the future may wish to carry out the full extent of works approved as part of the rail siding, which may necessitate a future Modification Application.</p>

<p><i>g) Please note, a development contribution for the proposed development is payable to Council. Council requests that a condition of consent be included, requiring the applicant receive written confirmation from Council that the applicable development contribution has been paid prior to the issue of any Construction Certificate.</i></p>	<p>Noted and agreed.</p>
<p><i>h) Separate approval is required for any signage, unless it is exempt under state legislation.</i></p>	<p>Noted and agreed.</p>
<p>Traffic and Parking</p> <p><i>i) The rate of future traffic generation should be estimated in accordance with RMS Traffic Generation Guideline and its supplements. The traffic generation rate that has been assumed in the Traffic Impact Assessment (TIA) largely varies from the "RMS Traffic Generation Guidelines".</i></p>	<p>With reference to Section 4.1 of the 2016 TIA report, the trip rates adopted by the study have been based on trip rate data from the RMS Technical Direction TDT 2013/04a, Guide to Traffic Generating Developments – Updated traffic surveys (the RMS Guide Update). In particular, the trip rates have been derived from the RMS data provided for the sites of Wonderland Business Park, Eastern Creek and the Erskine Park Industrial Estate. In accordance with RMS recommended practise, the adopted trip rates have been based on these 3 sites as they best reflect the type of industrial development of the Proposal.</p>
<p><i>j) It has been observed that a significant number of commercial and industrial premises are located in Swaffham Road. The traffic impact assessment (TIA) should consider the existing traffic generated from Swaffham Road.</i></p>	<p>The 2016 TIA report was based on traffic survey data of the study road network that would include the traffic generated by the industrial development on Swaffham Road. Accordingly, the TIA did consider the existing traffic generated from Swaffham Road.</p>
<p><i>k) The current Degree Of Saturation (DOS) for Campbelltown Road/Rose Payten Drive is 0.922 which already exceeds the recommended DOS (0.9) in clause 4.4.10 of AustRoads Guide to Traffic Management Part 12. Additional traffic to be generated as a result of the subject development would worsen the scenario. This is an issue that must be adequately addressed prior to any approval.</i></p>	<p>Firstly, this intersection is an intersection of roads that are of strategic importance to RMS; therefore, comments made by RMS in relation to the performance of this intersection are of greatest priority. It is therefore noteworthy that RMS raised no concerns in relation to the forecast performance of this intersection. Secondly, DOS is 1 of a number of performance measures that need to be considered as a part of assessing an intersections performance. When assessing the performance of an intersection, RMS guidance generally considers Average Vehicle Delay (AVD) and the corresponding Level of Service (LOS) of greater priority to DOS. In this regard, the results indicate that the intersection would (with development) have an AVD of 20.7</p>

	<p>seconds and 24.0 seconds during the morning and evening peak periods, respectively. These AVDs correspond to an LOS of B, which indicates the intersection would perform satisfactorily at a 'good' level of operation.</p> <p>In summary, the results indicate that the additional traffic to be generated by the Proposal can be satisfactorily accommodated at the intersection and indeed all intersections of the study road network. This conclusion is supported by the RMS submission, which raised no concerns with the network modelling presented in the 2016 TIA report.</p>
<p><i>l) The directional analysis is to be representative of the estimated future generated trips from the subject development.</i></p>	<p>The 2016 TIA report adopted a directional split of 75% arrivals and 25% departures during the morning peak hour (and vice versa during the evening peak hour), which is representative of what would be expected for an industrial development.</p> <p>With regard to trip distribution, as specified at Section 4.3, the 2016 TIA report adopted a distribution onto the surrounding road network based generally on the travel patterns evident from the existing traffic flows on the network, combined with a review of Journey to Work census data for workers in the surrounding area. Accordingly, the distribution of traffic is representative of what would be expected for an industrial development in this location.</p>
<p><i>m) The Traffic Impact Assessment (TIA) must address the proportion of heavy vehicles in peak hour traffic volume.</i></p>	<p>With reference to our response above to DPE Comment 2(ii), based on surveys of other industrial estate roads and from the detailed site survey data from within the RMS Guide Update, the 2016 TIA report assessed the impacts of 20% of the forecast operational traffic being heavy vehicles (trucks).</p>
<p><i>n) Any software model prepared for the Traffic Impact Assessment shall be submitted to Council for review.</i></p>	<p>This is not a standard submission comment that can be literally addressed by this letter. Should DPE consider it necessary, we would be willing to issue our SIDRA traffic models to Council. It is however noteworthy that standard SIDRA outputs were attached to the 2016 TIA report at Appendix B and – as mentioned previously – RMS raised no concerns with the modelling.</p>
<p><i>o) According to Figure 5 of the Traffic Impact Assessment Report, each of the left turns and northbound traffic in the roundabout of Airds Road and Culverston Road would give way to more than 3 vehicles during afternoon peak hour. On the other hand the proposed driveway of stage 2 car parking has a clearance of 120 metres from the adjacent roundabout. The queue length if extended up to the</i></p>	<p>Firstly, it must be noted that the 350 vehicle movements referred to by Council is not a significant volume of traffic; on average less than 1 movement every 10 seconds, providing plenty of opportunity for through and left-turning traffic from the Culverston Road (south) approach to enter the roundabout.</p>

<p><i>driveway would cause a hazard to the car parking. Council recommends undertaking a study to assess the Traffic Queue and the implications of the queue lengths in this area and the impact those queue lengths will have on the movement of traffic in the area.</i></p>	<p>Secondly, the SIDRA analysis provides the traffic queue assessment that Council is after. The detailed SIDRA outputs attached to the 2016 TIA report at Appendix B indicate that the forecast 95th-percentile queue of traffic exiting the Culverston Road approach would be just 0.9 vehicles in length or 6.5 metres, well short of the 120 metres referred to by Council and therefore of no material risk of creating a hazard to the car parking.</p>
<p><i>p) All vehicle swept path analysis shall be undertaken using the longest design vehicle to access the site. All truck entries shall be designed in order to accommodate the opposing swept paths of the longest vehicle turning safely that the same time. In this regard, it is considered that for warehouses of the size proposed, B-double vehicles would be highly likely to use the site. Accordingly, a swept path analysis for full size B-doubles is required to be submitted to Council, to demonstrate that B-double combination vehicles will be able to access the site, manoeuvre satisfactorily, and safely leave the site in a forward direction.</i></p>	<p>Concurrent B-Double access is not provided in the current design for Warehouses 1B, 1C and 1D as this would require excessive driveway widths which is considered undesirable due to the impact on the frontage. This is considered acceptable under AS2890.2 Clause 3.2.4 (b), which states "The swept path of the maximum size design vehicle using the facility may be allowed to occupy the entire width (less specified clearances) of a two-way access driveway when the vehicle is entering or leaving the minor road". In this regard, Attachment 1 (Appendix 2) details B-Double access to all warehouses.</p>
<p>Flooding</p> <p><i>q) Any development of this site will require drainage to be accommodated in accordance with the Campbelltown City Council Engineering Design Guide for Development.</i></p>	<p>Noted.</p>
<p><i>r) The existing stormwater infrastructure adjacent to the site needs to be assessed for capacity for the future connection of stormwater drainage coming from the site.</i></p>	<p>Where new connections to existing channels are required to suit the proposed development Council will be consulted regarding new connection details.</p>
<p><i>s) All drainage software modeling undertaken for the subject subdivision shall be submitted to Council for assessment.</i></p>	<p>Drainage models will be submitted to Council following completion of detailed design.</p>
<p><i>t) The proposed site is affected by 1% AEP flood event based on Council's recent flood advice. A stormwater management plan shall be submitted to Council for the proposed development detailing management of major and minor flood events.</i></p>	<p>The site is proposed to be filled above the 1% AEP flood level and Council has advised this won't have any adverse flood impacts (refer Attachment A and B of Appendix 3).</p> <p>A stormwater management plan will be prepared during detailed design and following SSD approval. This will document the proposed pit/pipe network, catchments and overland flow paths within the site.</p>

<p>7. NSW Department of Planning & Environment</p>	
<p>a) Clause 4.6 Variation</p> <p><i>Please provide a set of elevation plans of the warehouse buildings identifying the 12m height control under Campbelltown Local Environmental Plan 2015. These plans should identify the building area of building area of each warehouse located above the 12m height limit.</i></p>	<p>A revised set of architectural plans have been provided which show the 12m height limit with respect to the ridge of the proposed warehouse facilities (refer Appendix 1).</p> <p>The overall impact is demonstrated to be minimal as a result of the breach, given the setbacks achieved and visual articulation of buildings.</p>
<p>b) Traffic</p> <ul style="list-style-type: none"> ▪ <i>Please confirm the anticipated total daily peak traffic volumes during construction. This information should include the number of heavy vehicles as a proportion of the anticipated construction traffic.</i> ▪ <i>Please provide the proportions of light and heavy vehicles for predicted daily operational traffic volumes.</i> 	<p>Ason Group have prepared an addendum statement dated 22 September 2016 which responds to the matters raised in relation to traffic. The statement confirms peak traffic volumes as follows:</p> <ul style="list-style-type: none"> ▪ <i>Peak construction personnel on-site of 350 workers, for a total of 700 light vehicle trips per day.</i> ▪ <i>Peak construction trucks to site of 200 trucks, for a total of 400 heavy vehicle trips per day.</i> ▪ <i>Morning peak hour of 125 trips with an afternoon peak of 75 trips.</i> <p>In response to DPE’s comment on light and heavy vehicle proportions, based on surveys of other industrial estate roads and from the detailed site survey data from within the RMS Technical Direction TDT 2013/04a, Guide to Traffic Generating Developments – Updated traffic surveys, it is anticipated that:</p> <ul style="list-style-type: none"> ▪ <i>80% of the forecast operational traffic would be light vehicles, and</i> ▪ <i>20% of the forecast operational traffic would be heavy vehicles (trucks).</i>

<p>c) Stormwater and flooding</p> <ul style="list-style-type: none"> ▪ <i>Please provide revised stormwater modelling for the 100 year ARI and PMF flood events in the event Campbelltown City Council's regional flood model is obtained.</i> ▪ <i>If revised modelling requires amendments to the proposed civil works and/or site levels revised civil and bulk earthworks plans should be provided in RTS for assessment.</i> ▪ <i>Any Flood Management Plan for the site should be prepared in accordance with the Floodplain Development Manual, April 2015.</i> 	<p>Following preparation of Arcadis' Flooding and Stormwater Assessment report, Council's regional flood model was run by Council's consultant to provide a site specific flood assessment. Council's assessment concluded that:</p> <ul style="list-style-type: none"> ▪ "there is no impact on adjoining property in the 1% AEP event"; and ▪ that it would be "reasonable to expect that there would be little to no effect for rarer events than the 1% AEP event." Refer to Appendix A and Appendix B of the Arcadis Report at Appendix 2 of this RTS.
<p>d) Contamination</p> <ul style="list-style-type: none"> ▪ <i>The Department notes a Phase 2 investigation will be provided with the RTS to determine whether any remedial works are required to manage potential soil and groundwater contamination on the central portion of the site.</i> 	<p>A Phase 2 investigation and Remediation Action Plan have been provided (prepared by Golder Associates - Appendix 3).</p> <p>The Phase 2 Investigation concludes that an assessment of the soil and groundwater quality at nominated locations positioned in the central precinct of the site, indicates that a remediation action plan for soil will be required for the fuel infrastructure area, due to the reported exceedance for the NEPM 2013 Management Limit criteria at two locations (SB6 and MW4) for TRH >C10-C16 fraction F2.</p> <p>The findings and recommendations of the Remediation Action Plan set out the nominated remediation and/or management approaches for impacted materials located at the site; and suitable validation protocols, including criteria, for the remediation works.</p> <p>It is requested that the RAP be incorporated as part of the 'Approved Documentation' upon issuing development consent for the proposal.</p>
<p>e) External Storage</p> <ul style="list-style-type: none"> ▪ <i>Please confirm the potential goods to be stored on the external storage areas along the eastern part of the site, including their potential height and any screening measures required to mitigate the visual impacts associated with the storage of goods in this location.</i> ▪ <i>Revised photomontages of the external storage area from Rose Payten Drive, including any screening measures to demonstrate the extent of the potential visual impacts should be provided.</i> 	<p>The potential goods to be stored on the external storage areas will generally consist of freight (being consumer goods and the like), however will not include any dangerous goods so as to trigger thresholds prescribed under State Environmental Planning Policy No.33 Hazardous & Offensive Development.</p> <p>The proposed height of the container stacks on the designated storage area will be two containers high, and shall therefore not exceed the height of the proposed warehouse facilities. The visual impacts associated with the external storage area will be appropriately offset by the landscaped buffers within the setbacks and</p>

	<p>planting commensurate with the scale of the overall development and climatic conditions.</p> <p>Photo montages have been provided of the development, from two perspectives external to the development site. These include from the eastern side of the Southern Railway (elevated) and Rose Payten Drive (elevated) (116101_A_SSD_10013 & 116101_A_SSD_10014).</p> <p>As can be seen from these elevated and street angles, there will be extensive buffers between the site boundaries and the external storage area, which have the capacity to accommodate mature vegetation and dense planting to screen the site.</p>
<p>f) Signage</p> <ul style="list-style-type: none"> ▪ <i>Please provide details of all signage proposed to be installed on-site.</i> 	<p>A signage strategy plan has been prepared to support the proposal. The two main types of signage include estate signage (maximum height 5m) and directional signage (maximum height 3m). The proposed location of all signs is shown on the plan 116101_A_SSD_A0009.</p>
<p>8. Department of Primary Industries</p>	
<p>a) <i>The Department has reviewed the Environmental Impact Statement and provides the following advice:</i></p> <p><i>Construction dewatering may require a license from DPI Water.</i></p>	<p>Noted and agreed.</p>
<p>9. Endeavour Energy</p>	
<p>a) Networks Capacity Connection</p> <p><i>In due course the applicant for the future proposed development of the site will need to submit an application for connection of load via Endeavour Energy's Network Connections Branch to carry out the final load assessment and the method of supply will be determined.</i></p>	<p>Noted and agreed.</p>

Depending on the outcome of the assessment, any required padmount substations will need to be located within the property (in a suitable and accessible location) and be protected (including any associated cabling) by an easement and associated restrictions benefiting and gifted to Endeavour Energy. Please find attached for the Panels' reference a copy of Endeavour Energy's Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights'. Further details are available by contacting Endeavour Energy's Network Connections Branch via Head Office enquiries on telephone: 133 718 or (02) 9853 6666 from 8am - 5:30pm or on Endeavour Energy's website under 'Home > Residential and business > Connecting to our network' via the following link:

<http://www.endeavourenergy.com.au/>

Endeavour Energy has noted the following in the Environmental Impact Statement (Page 67):

Electrical

The electrical supply authority for the area is Endeavour Energy. An asset located at the end of Culverston Rd adjacent to the roundabout voltage is reticulated along Culverston Rd from Airds Rd. Contact Endeavour Energy and information regarding the existing electrical assets provided following payment through an enquiry application during development.

Based on assumptions of Endeavour Energy's standard kiosk size servicing the existing development of the site is estimated to have 1.5MVA. Based on this assumption, the existing kiosk substation is unlikely to have capacity to serve all of the new development. However, utilising this asset is acceptable, as it may be possible to utilise this existing asset at approximately half of the site.

Further to the above, DBYD details show an Endeavour Energy asset kiosk substation terminating in the development, however it is not clear. As part of the design process with Endeavour Energy this asset will be removed/relocated. Any existing low voltage connections within the site will be decommissioned as the site is developed.

In regards to the final paragraph, as shown in the below site plan from Endeavour Energy's G/Net master facility model for Lot 400 in DP 875711, it would appear that the 'asset heading east from the kiosk substation' appears to have been intended to facilitate a proposed subdivision of the lot.

b) Asset Relocation

If required to facilitate the future development of the site, advice on the possible relocation of the existing electrical assets on the site can be obtained by submitting a Technical Review Request to Endeavour Energy's Network Connections Branch, the form for which FPJ6007 is attached and further details (including the

Noted and agreed.

applicable charges) are available from Endeavour Energy's website via the following link under 'Our connection services':

<http://www.endeavourenergy.com.au/>

Alternatively the applicant future development of the site should engage a Level 3 Accredited Service Provider (ASP) approved to design distribution network assets, including underground or overhead. The ASP scheme is administered by NSW Trade & Investment and details are available on their website via the following link:

<http://www.resourcesandenergy.nsw.gov.au/energy-supply-industry/pipelines-electricity-gas-networks/network-connections/contestable-works>

c) Easement Management/Network Access

Please find attached for the applicant's reference a copy of Endeavour Energy's 'General Restrictions for Overhead Power Lines'. The following is a summary of the usual / main terms of Endeavour Energy's electrical easements works requiring that the land owner:

- *Not install or permit to be installed any services or structures within the easement site.*
- *Not alter the surface level of the easement site.*
- *Not do or permit to be done anything that restricts access to the easement site without the prior written permission of Endeavour Energy and in accordance with such conditions as Endeavour Energy may reasonably impose.*

Accordingly, if the proposed development will encroach/affect Endeavour Energy's easements / electrical assets, contact must first be made with the Endeavour Energy's Easement Officer, Philip

Noted and agreed.

Wilson, on 9853 7110 alternately
Philip.Wilson@endeavourenergy.com.au.

It is imperative that the access to the existing electrical infrastructure adjacent and on the site is maintained at all times. To ensure that supply electricity is available to the community, access to the electrical assets may be required at any time.

d) Safety Clearances

Any future proposed buildings, structures, etc. must comply with the minimum safe distances / clearances for voltages up to and including 132,000 volts (132kV) as specified in AS/NZS 7000:2010 'Overhead line design - Detailed procedures' and the 'Service and Installation Rules of NSW'. Different voltages are kept at different heights, the higher the voltage, the higher the wires are positioned on the pole. Similarly, the higher the voltage, the greater the required building setback. These distances must be maintained at all times a eg. for the erection of scaffolding etc., and regardless of the Council's allowable building setbacks etc. under its development controls, allowance must be made for the retention of appropriate / safe clearances.

Noted and agreed.

e) Earthing

The construction of any building or structure (including fencing) that is connected to or in close proximity to Endeavour Energy's electrical network is required to comply with AS/NZS 3000:2007 'Electrical installations' to ensure that there is adequate connection to the earth. Inadequate connection to the earth places persons and the electricity network at risk.

Noted and agreed

f) Vegetation Management

Noted and agreed.

The planting of large trees in the vicinity of electricity infrastructure is not supported by Endeavour Energy. Suitable planting needs to be undertaken in proximity of electricity infrastructure. Only low growing shrubs not exceeding 3.0 metres in height, ground covers and smaller shrubs, with non-invasive root systems are the best plants to use. Larger trees should be planted well away from electricity infrastructure and even with underground cables, be installed with a root barrier around the root ball of the plant. Landscaping that interferes with electricity infrastructure may become subject to Endeavour Energy's Vegetation Management program and/or the provisions of the *Electricity Supply Act 1995* (NSW) Section 48 'Interference with electricity works by trees' by which under certain circumstances the cost of carrying out such work may be recovered.

g) Asbestos

Endeavour Energy's G/Net master facility model indicates that Culverston Road is a location identified or suspected of having asbestos or asbestos containing materials (ACM) present within the electricity network. Whilst Endeavour Energy's underground detail is not complete within G/Net in some areas, in older communities, cement piping was regularly used for the electricity distribution system and in some instances containing asbestos to strengthen the pipe; for insulation; lightness and cost saving.

When undertaking works on or in the vicinity of Endeavour Energy's electricity network, asbestos or ACM must be identified by a competent person employed by or contracted to the applicant and an asbestos management plan, including its proper disposal, is required whenever construction works has the potential to impact asbestos or ACM.

The company's potential locations of asbestos to which construction / electricity workers could be exposed include:

- o customer meter boards;*
- o conduits in ground;*

Noted and agreed.

- o padmount substation culvert end panels; and
- o joint connection boxes and connection pits.

Further details are available by contacting Endeavour Energy's Health, Safety & Environment via Head Office enquiries on telephone: 133 718 or (02) 9853 6666 from 8am - 5:30pm

h) Demolition

Demolition work is to be carried out in accordance with Australian Standard AS2601: The demolition of structures (AS 2601). All electric cables or apparatus which are liable to be a source of danger, other than a cable or apparatus used for the demolition works shall be disconnected ie. the existing customer service lines will need to be isolated and/or removed during demolition. Appropriate care must be taken to not otherwise interfere with any electrical infrastructure on or in the vicinity of the site eg. street light columns, power poles, overhead and underground cables etc.

Noted and agreed

i) Dial Before you Dig

Before commencing any underground activity the applicant is required to obtain advice from the Dial before You Dig 1100 service in accordance with the requirements of the Electricity Supply Act 1995 (NSW) and associated Regulations. This should be obtained by the applicant not only to identify the location of any underground electrical infrastructure across the sites, but also to identify them as a hazard and to properly assess the risk.

Noted and agreed.

j) Public Safety

Noted and agreed.

Workers involved in work near electricity infrastructure run the risk of receiving an electric shock and causing substantial damage to plant and equipment. I have attached Endeavour Energy's public safety training resources, which were developed to help general public / workers to understand why you may be at risk and what you can do to work safely. The public safety training resources are also available via Endeavour Energy's website via the following link:

<http://www.endeavourenergy.com.au/wps/wcm/connect/ee/nsw/nsw+homepage/communitynav/safety/safety+brochures>

Appendix 1
Architectural Drawings & Landscape Plan

Appendix 2
Traffic Impact Assessment (Addendum)

Appendix 3
Flood Response

Appendix 4
Phase 2 Investigation & RAP