



ACN: 146 035 707 ABN: 54 146 035 707
Suite 4, Level 7, 100 Walker Street
North Sydney NSW 2060
P: 02 9929 6974
enquiries@willowtreeplanning.com.au
www.willowtreeplanning.com.au

Kelly McNicol
Team Leader, Industry Assessments
NSW Department of Planning & Environment
320 Pitt Street
Sydney NSW 2000
Kelly.McNicol@planning.nsw.gov.au

STATE SIGNIFICANT DEVELOPMENT APPLICATION (SSD 9429) FOR PROPOSED WAREHOUSE AND DISTRIBUTION FACILITY (SNACK BRANDS)

PROPERTY AT: LOT 7, 585-649 MAMRE ROAD, ORCHARD HILLS (LOT 2171 DP 1153854)

Dear Kelly,

Reference is made to the subject State Significant Development Application (SSDA) – SSD 9429 – that was lodged with the NSW Department of Planning & Environment (DP&E) on 7 September 2018 for a proposed Warehouse and Distribution Facility (High Bay Warehouse) for Snack Brands at the identified Subject Site – Lot 7, 585-649 Mamre Road, Orchard Hills (First Estate – Lot 2171 DP 1153854).

Following a review of the NSW DP&Es request for the Response to Submissions (RTS) dated 23 November 2018, the matters raised have been taken into consideration and are accurately addressed in the response matrix that is attached to this letter. It is considered that this information now provides NSW DP&E with all the necessary facts and relevant particulars related to the proposed development subject to this SSDA; therefore, enabling the assessment to be finalised and the proposal determined.

We look forward to the NSW DP&Es feedback on the information provided and look forward to progressing with the assessment of this SSDA.

Should you wish to discuss further, please contact the undersigned on 0413 555 638.

Yours Faithfully,

Andrew Cowan
Director
Willowtree Planning Pty Ltd
ACN 146 035 70

State Significant Development Application – SSD 9429

Proposed Warehouse and Distribution Facility (Snack Brands) – Lot 7, 585-649 Mamre Road, Orchard Hills

Enclosed:

- **Appendix 1 – Architectural Plans**
- **Appendix 2 – Landscape Plans**
- **Appendix 3 – Strategic Justification Letter**
- **Appendix 4 – Biodiversity Waiver**
- **Appendix 5 – Ason Group Transport Letter**

State Significant Development Application – SSD 9429

Proposed Warehouse and Distribution Facility (Snack Brands) – Lot 7, 585-649 Mamre Road, Orchard Hills

Table 1: Response Matrix	
Relevant Entities Response to Submissions	Formalised Response
NSW Department of Planning & Environment (Kelly McNicol – Team Leader, Industry Assessments)	
<p>Height:</p> <p>1. Page 4 of the RTS states:</p> <p><i>"The proposed building height is for approximately 36.8 m at the ridge height as per the architectural plans. Appendix 21 regarding the proposed ASRS relates to the proposed racking within the proposed high bay warehouse, which attains a height of approximately 30 m; hence the 6.8 m balance. No further consideration is required in this respect."</i></p> <p><i>The intent of the Department's initial question regarding the 6.8 m height balance was to understand why this difference between the ASRS and the ridge of the warehouse structure is proposed. As it stands, it appears there is 6.8 m of unused and unnecessary height between the top of the ASRS and the highest point of the warehouse and the overall height of the structure could potentially be reduced. The Department requires the Applicant to clarify why this 6.8 m on top of the ASRS at the highest point of the building is required.</i></p>	<p>The proposed building height is determined by the height of the Automated Storage and Retrieval System (ASRS) (~30m) and includes provisions for specific clearances for the sprinkler system as well as the slope of the roof, further complementing the compliance of the built-form. This results in the high bay eaves height of RL 67-.85 at the southern edge of the proposed facility. The resultant three (3) degree roof slope results in the high bay eaves height of RL 73.10 at the northern edge of the proposed facility.</p> <p>Furthermore, the built-form of the proposed facility has adopted a mono slope roof of approximately three (3) degrees for the following reasons:</p> <ul style="list-style-type: none"> Three (3) degree slope has been demonstrated to overcome hail build-up that has resulted in several other building collapses; and, Mono slope roof falling to the south avoids hail / roofwater overflow (in a severe weather event) falling ~20 m to the low bay roof below impacting the integrity of the lower roof. <p>Additionally, the mono slope roof could be substituted for a conventional central E / W ridge double slope roof, which would ultimately reduce the overall height of the proposed facility; however, this increases the risk to the low bay roof, with regard to water overflowing from the high bay gutter onto the low bay roof, in severe weather events.</p> <p>If a double slope roof was adopted, a reduction of only 3 m in height would be the resultant effect; however, this option was not chosen due to the WH&S risk resulting from the maintenance of guttering at this height, as well as large downpipes, which would include large structural supports. Accordingly, this would have an adverse visual impact to the northern face.</p>
<p>Construction:</p> <p>2. The Department notes the RTS provides staging of the proposed</p>	<p>The estimated timeframes for each construction phase of the proposed development is as follows:</p>

State Significant Development Application – SSD 9429

Proposed Warehouse and Distribution Facility (Snack Brands) – Lot 7, 585-649 Mamre Road, Orchard Hills

<p><i>development as follows:</i></p> <ul style="list-style-type: none"> ▪ <i>Commencement of Earthworks January 2019</i> ▪ <i>Building Construction Commencement February 2019</i> ▪ <i>Tenant Fit out Works Commencement July 2019</i> ▪ <i>Construction Completion November 2019.</i> <p><i>An estimation of timeframes (e.g. weeks, months) for each of the construction phases listed above is also required.</i></p>	<ul style="list-style-type: none"> ▪ Commencement of Earthworks- January 2019 <ul style="list-style-type: none"> ○ Earthworks January 2019 – February 2019 ▪ Building Construction commencement February 2019 <ul style="list-style-type: none"> ○ Building Construction February 2019 – November 2019 ▪ Tenant Fitout Works commencement July 2019 <ul style="list-style-type: none"> ○ Tenant Fitout Works July 2019 – March 2020 ○ Commissioning March 2020- August 2020 ○ Operations commence October 2020
<p>Biodiversity:</p> <p>3. <i>Section 7.9(2) of the Biodiversity Conservation Act 2016 requires a State significant development application to be accompanied by a Biodiversity Development Assessment Report (BDAR) unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impacts on biodiversity values.</i></p> <p><i>A written request for a BDAR waiver is required to be made to the Planning Secretary, in accordance with Section 7.9(2) of the Biodiversity Conservation Act 2016. The request is required to address:</i></p> <ul style="list-style-type: none"> ▪ <i>Section 1.5 of the Biodiversity Conservation Act 2016</i> ▪ <i>Clause 1.4 of the Biodiversity Conservation Regulation 2017.</i> 	<p>A Biodiversity Waiver (refer to Appendix 4) has been provided in accordance with Section 7.9(2) of the <i>Biodiversity Conservation Act 2016</i>.</p>
<p>Landscaping:</p> <p>4. <i>Provide the approximate height of the proposed landscape mound.</i></p> <p>5. <i>Will the proposed 2.1 m high palisade fence be located behind the proposed landscape planting, when viewed from the street? The</i></p>	<p>The Mamre Road frontage landscape mound is approximately 2-2.5 m above the undulating existing ground line at the boundary and approximately 1-1.5 m above the carpark, adjacent to the proposed facility; and, accommodates the change in level between the road widening reserve and the building platform.</p> <p>Additionally, the Distribution Drive frontage landscape mound is approximately 1.5-2.0 m above the road and carpark adjacent to the proposed facility.</p> <p>The landscape mound is further illustrated within the updated Landscape Plans located within Appendix 2 of this Submission.</p> <p>The fencing proposed along the Estate Road (Distribution Drive) will be located behind the proposed landscape planting and in line with other warehouses</p>

State Significant Development Application – SSD 9429

Proposed Warehouse and Distribution Facility (Snack Brands) – Lot 7, 585-649 Mamre Road, Orchard Hills

<p><i>schedule of materials and colours should include the proposed fence.</i></p>	<p>within First Estate, as demonstrated within the Landscape Plans in Appendix 2 of this Submission. Furthermore, the fencing proposed is considered consistent and ultimately compliant with what has been proposed and previously approved within First Estate. For example, FRNSW Building (approved via a Review of Environmental Factors (REF)), the DATS Warehouse and Distribution Centre (DA16/1118), DA18/0628 and DA18/0689, exhibit fencing of a similar nature to what has been proposed for the Snack Brands development.</p> <p>Therefore, to maintain consistency with the precedent that was established in Notice of Determination DA16/1118, the fencing proposed is considered to be consistent and compliant with regulatory and Australian Standards, as well as remaining consistent with previous Development Applications having undergone previous determination, such as DA18/0628 & DA18/0689 and the FRNSW approval, which constituted an approval via the submission of an REF.</p>
<p>Transport:</p> <p>6. <i>Further consideration of the public submission received during the exhibition period is required. Specifically, the response should clarify Snack Brand's proposed transport routes and whether the intersection of Mamre and Luddenham Roads would be used by Snack Brand's construction and/or operational vehicles.</i></p>	<p>From an operational standpoint, Snack Brands will not be utilising Luddenham Road in any such capacity as one of their main distribution routes, rather their operations will be focused on the closer, more suitable regional road network to the North and East, to likes of the M4 Motorway, the M7 Motorway via Erskine Park Road and Elizabeth Drive. Luddenham Road would only be utilised as a last resort if there were any identified road closures and / or traffic issues. No further consideration is considered to be warranted in this respect.</p> <p>Ason Group have provided the following comments with regard to the adjacent response (#6) concerning Mamre and Luddenham Roads (refer to Appendix 5). This includes:</p> <ul style="list-style-type: none">▪ At no stage during previous assessment and approvals in relation to the underlying Concept Plan has assessment of the Mamre Road / Luddenham Road intersection been requested by relevant Roads Authorities (Roads and Maritime Service, Transport for NSW or Council). As such, that intersection is considered outside the "study area" of the Mamre West developments.▪ Notwithstanding, it is emphasised that there are plans by RMS in progress to upgrade Mamre Road generally, including a new signalised intersection at Mamre Road / Luddenham Road. In this regard, any perceived existing issues at that intersection are assumed to be

State Significant Development Application – SSD 9429

Proposed Warehouse and Distribution Facility (Snack Brands) – Lot 7, 585-649 Mamre Road, Orchard Hills

	<p>satisfactorily addressed as part of those upgrade works.</p> <ul style="list-style-type: none"> ▪ Snack Brands traffic – to some extent – could reasonably be expected to use all publicly available routes. <ul style="list-style-type: none"> ○ As mentioned above, Luddenham Road would only be utilised during circumstances such as road closures and / traffic issues. ▪ With reference to the Traffic Impact Assessment, prepared by Ason Group (Ref: 0012r02v4) supporting the approved Masterplan, it is estimated that approximately 25% of Mamre West traffic would use Mamre Road, north of Erskine Park Road. As it relates to Snack Brands in isolation – generating a total of 41-42 veh/hr during peak periods – this equates to an additional 10 veh/hr traversing the intersection. ▪ Ason Group conclude, that the relative contribution of Snack Brands predicted traffic output at this intersection is considered to be minimal and not considered to warrant or justify any interim measures in advance of the general Mamre Road upgrade works.
<p>7. <i>The location for the 10 bicycle parking spaces is required to be shown on the plans.</i></p>	<p>Refer to the Architectural Plans in Appendix 1.</p>
<p>Employment:</p> <p>8. <i>Page 8 of the RTS states:</i></p> <p><i>"the proposed development would promote additional employment-generating opportunities (up to 500 jobs), to the wider locality as well as the community closer to home".</i></p> <p><i>This statement contradicts the information provided in the EIS which states: "Construction jobs are anticipated to be in the order of approximately 300, while operational jobs are expected to be in the order of 87."</i></p> <p><i>Clarification is required on the approximate employment number proposed for the development.</i></p>	<p>The statement provided previously in the EIS for the Stage 1 development is considered to be accurate, for which it was stated, that the Stage 1 development would provide in the order of approximately 300 construction jobs; and, in the order of approximately 87 operational jobs.</p>
<p>Façade Treatment:</p> <p>9. <i>The RTS should provide justification for the selection of 'Shale Grey' colourbond sheeting to replace the previously proposed white colourbond including the reduced visual impacts of the change to the façade treatment.</i></p>	<p>The following colours were considered, with the reflectivity index specified for each as follows:</p> <ul style="list-style-type: none"> ▪ Whitehaven 95; ▪ Surfmist 82; and, ▪ Shale Grey 66.

State Significant Development Application – SSD 9429

Proposed Warehouse and Distribution Facility (Snack Brands) – Lot 7, 585-649 Mamre Road, Orchard Hills

	Accordingly, Shale Grey was selected due to significantly reduced reflectivity index, as opposed to the other two (2) options considered. No further consideration is considered warranted in this respect.
--	---

State Significant Development Application – SSD 9429

Proposed Warehouse and Distribution Facility (Snack Brands) – Lot 7, 585-649 Mamre Road, Orchard Hills

Appendix 1
Architectural Plans

Appendix 2

Landscape Plans

Appendix 3

Strategic Justification Letter

Appendix 4

Biodiversity Waiver

Appendix 5

Ason Group Transport Letter