

7 April 2025

Tom Bertwistle
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Dear Tom,

SSD-65924461 - THREE-STOREY WAREHOUSE AND DISTRIBUTION CENTRE, 49-61
STEPHEN ROAD, BANKSMEADOW - GOODMAN SUBMISSION

We write regarding application SSD-65924461 (the Proposal) for a proposed three-storey warehouse and distribution centre at 49-61 Stephen Road, Banksmeadow (the Site) (highlighted in yellow in Figure 1), lodged with the Department of Planning, Housing and Infrastructure (DPHI) and currently on exhibition.

Goodman owns numerous industrial properties surrounding the Proposal (highlighted in green, Fig. 1) and are therefore keenly interested in resulting environmental impacts from the Proposal.



Figure 1 – Site (yellow) and Goodman assets (green)

AU02-1967080693-6378418.0 Goodman Group

Goodman Limited | ABN 69 000 123 071

Goodman Funds Management Limited | ABN 48 067 796 641 | AFSL Number 223621
as responsible entity for Goodman Industrial Trust | ARSN 091 213 839

The Hayesbery, 1-11 Hayes Road, Rosebery NSW 2018 | GPO Box 4703, Sydney NSW 2001 Australia
Tel +61 2 9230 7400 | Fax +61 2 9230 7444

Goodman Logistics (HK) Limited | BRN 59357133 | ARBN 155 911 149 | a Hong Kong company with limited liability
Suite 901, Three Pacific Place, 1 Queen's Road East, Hong Kong | Tel +852 2249 3100 | Fax +852 2525 2070

info-au@goodman.com | www.goodman.com

We have the following comments on the Proposal for your consideration:

1 Contamination

- + It is noted that an EPA Accredited Site Auditor has been appointed for the Development; however no Section B Site Audit Statement has been included with the Application. This is important to ensure the site can be made suitable for the intended purpose and should be provided prior to DPHI approval of the Proposal.
- + Relevant conditions of consent should be included with the SSDA-65924461 approval, to ensure appropriate remediation of the site is undertaken and any potential offsite impacts are mitigated. This includes the requirement for a Remediation Action Plan (RAP) and the issuance of a Section A Site Audit Statement.
- + Goodman requests to be kept informed of the proposed site remediation (RAP) once finalised.

2 Flooding

It is noted that the flood assessment has inconsistencies with the Bayside DCP, key issues for consideration are as follows:

- + Due to the extent of works proposed on-site, including the existing overland flow path, Goodman cannot be confident there will be no adverse off-site impacts of up to 10 mm in the 1% AEP event and up to 50 mm in the PMF event without a site-specific 2D hydraulic model for the proposed development.
- + Off-site flood impacts in the 1% AEP with climate change event do not appear to be adequately addressed in the assessment and should be provided.
- + The amount of overland flow discharging from the site, as estimated by the DRAINS model, appears underestimated due to the blockage factors adopted when compared to a 2D hydraulic model.
- + There is a substantial amount of pit inserts proposed within the stormwater quality treatment train which will require regular maintenance. If not adequately maintained, this could impact on the water quality outcomes for downstream properties. Relevant conditions of consent should therefore be included to ensure appropriate maintenance is maintained.

It is requested that the flood assessment be updated to consider the above-mentioned items.

3 Traffic Impact

- + The Traffic Impact Assessment (TIA) assesses the current, but not future, traffic conditions. Studies suggest that the future traffic conditions in the Banksmeadow precinct will be subject to congestion and delays. It is therefore essential for the future scenarios to be considered in the TIA, including 10 years in the future.
- + The TIA adopts the large format warehouses' traffic generation rate, with 'tenancies providing greater than 5,000m²'. As the Proposal comprises 24 individual tenancies with the with sizes ranging from 1,149m² to 3,226m², a more appropriate rate should be adopted to avoid underestimating trip generation caused by the Proposal. A more appropriate rate of 0.3

movements / 100m² for standard analysis and also conducting sensitivity analysis using a rate 0.5 movements / 100m² is suggested. Alternatively, surveys of a similar development should be undertaken.

- + The TIA does not provide clarity on the 'AM peak' or 'PM peak' periods. It references the AM peak as 07:45-08:45 and the PM peak as 15:00- 16:00, however no summary on existing traffic flows is provided to confirm these periods. Survey data for the full morning and afternoon period should be provided to validate the suggested peak period timeframes.
- + To assess the impact of the Proposal, a SIDRA model has been developed with intersections modelled in isolation. This means no consideration is given to the interaction between the identified intersections – particularly necessary for the Botany Road corridor. The SIDRA modelling should be revised to model the identified intersections as a network, which would ensure that the interdependencies between intersections are accurately assessed, and the network operates appropriately at peak periods.
- + While the SEARS requires assessment of vehicle queue lengths on intersection resulting from the proposal, there is no discussion on this in the Proposal. The TIA should be updated to include this assessment.
- + No swept path analysis for the Fire Rescue New South Wales Brigade Appliance set down has been completed for the required manoeuvres. This should be included in the TIA.

We request that the Applicant consult with Goodman in the preparation of the Construction Environmental Management Plan (CEMP), Construction Environmental Traffic Plan (CTMP), Remedial Action Plan (RAP), and long-term environmental management plan (LTEMP) to ensure the impacts to the area are acceptably managed.

We thank you for reviewing our submission and await your response.

Yours sincerely



Guy Smith
Head of Planning