



Our reference: 7812382
Contact: Jane Hetherington
Telephone: (02) 4732 8078

16 October 2017

Department of Planning and Environment
By email: thomas.piovesan@planning.nsw.gov.au

Dear Mr Piovesan

Submission for Stage Significant Development Application Costco Wholesale Warehouse and Distribution Centre (SSD 8209)

I refer to your email regarding the Exhibition of Stage Significant Development Application Costco Wholesale Warehouse and Distribution Centre (SSD 8209) dated 29 August 2017. The plans and supporting information has been reviewed and the following comments are made for consideration with the assessment.

Noise Management

The Noise Report, prepared by SLR, dated 14 June 2017, indicates that the sensitive receivers located at Jacfin & Capitol Hill may be impacted by construction noise. It notes that construction may occur prior to residential development occurring. However, mitigation measures proposed in the circumstance that residential occupation has occurred prior to construction commencing is inadequate to address this potential.

State Environmental Planning Policy No. 33 – Hazardous and Offensive Development

SSD6917 includes conditions E53 & E54 limiting the storage of dangerous goods below the thresholds outlined in SEPP 33.

The report prepared by Core Engineering Group concludes that *“SEPP33 does not apply to the proposed facility and no additional planning risk studies are required for the development”*.

The report does not sufficiently explain why the SEPP does not apply. The report states on page 2 that *class PHI materials will not be stored at the facility* (assuming the reference should state PGI materials). Table 3-1 on page 5 indicates that the facility will store < 1 tonne of PGI class 3 flammable liquids. Clarification, however, is required as whether the facility is, or is not, storing PGI class 3 flammable liquids.

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Land Contamination

A preliminary and stage 2 detailed investigation of contamination on the site was carried out as part of the Oakdale South Industrial Estate Concept Proposal and Stage 1 SSDA 6917.

The conclusion of the previous investigations deemed the site suitable for commercial/industrial land use. As such no further investigation is required and SEPP 55 is not triggered within this assessment. However, Council notes that the EIS did not mention development consent requirements for remediation should contamination be identified.

Stormwater Management

- The size and type of GPTs proposed has not been included on the Civil Works Plans or other documentation. The MUSIC modeling relied on for the entire OSE specified the on-lot GPTs as Rocla CDS type-units. Prior to Construction Certificate the proponent is to confirm the size and type of GPTs. If a substitute for the CDS-type GPTs is proposed the MUSIC modeling must be redone and resubmitted to ensure the overall water quality targets are not compromised.
- An Operation and Maintenance Plan must be prepared for all on-lot stormwater treatment measures prior to Construction Certificate. This should include details on the inspection frequency and cleaning/maintenance requirements of the proposed treatment measures, checklists, as well as detail on how this will be managed (nominate who will be responsible). The water balance and demand analysis in the Water Management Plan was only undertaken for Stage 1 of the development. As this application is for both Stage 1 and Stage 2, the water demand analysis must be resubmitted to include Stage 2 requirements, so that appropriate water conservation and reuse is applied to the whole development.
- There is a discrepancy between the Water Management Plan and the Sustainability Management Plan regarding the sizing of the rainwater tanks proposed. The Sustainability Management Plan drastically underestimates the size of rainwater tanks required (i.e. only 50KL for the entire 14.27 ha site). The 450KL rainwater tanks for Stage 1 as proposed by the Water Management Plan is consistent with the requirements of the DCP 2014 for water reuse and conservation in an industrial development.
- Drawing DAC2.06 is missing from the online Civil Works Plans package.

Landscaping

- The site adjoins rural-residential lands. The perimeter landscaping along the eastern boundary is inadequate and inconsistent with the previously approved landscape concept plan.
- Swale planting is to include trees to screen retaining walls and reduce the scale of the built form.
- Additional and more effective screening plants are required to screen retaining walls so their surface is screened 90%.

- The substation should be relocated to a less visually intrusive location away from pedestrian routes and entrances.
- Landscape cross-sections should be provided to understand the changes in the levels.
- Perspectives should be provided from key locations, including from the rural-residential lands to the east, that accurately indicate the proposed landscaping.
- No footpath is provided through certain sections of the car park. To ensure pedestrian safety, the footpath should be provided along the entire length.
- Fencing details should be provided. Fences should be setback approximately 2m from the front boundary.
- The northern boundary has an interface with open space riparian corridor. A greater diversity of tree species including larger tree species in the planting mix shall be provided.
- The landscaping should be amended to include shrubs. Fast growing shrubs (i.e. Wattles) should be considered to provide screening in the medium term while other landscaping is being established.
- Insufficient landscaping is provided to the western end of the retaining wall located between the car parks.
- Street trees are to be provided in accordance with the approved street tree masterplan (including layout and other materials).
- The hard stand area to the west of the building appears excessive. This area should be reduced to allow for greater landscaping between the car park areas.

Should you require any further information or would like to discuss this matter further, please do not hesitate to contact Jane Hetherington on (02) 4732 8078.

Yours faithfully



Gavin Cherry
Development Assessment Coordinator