

17th December, 2015.

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

Attention: **Kate McDonald C/- Thomas Piovesan E: thomas.piovesan@planning.nsw.gov.au**

Dear Sir,

Re: **Oakdale South Industrial Estate, Erskine Park, Penrith LGA**
Application No. SSD 6917 - Goodman Property Services (Aust) Pty Ltd
Lot 12 DP 1178389 and Lot 87 DP 752041 Milner Avenue, Erskine Park.

As previously discussed and confirmed via our letter dated 11th December 2015, we now forward our more detailed submission.

In preparing the attached submission, reference was made to a number of documents including:-

- (a) Noise Impact Assessment prepared by Sebastian Giglio dated 10th December 2015 (copy attached);
- (b) Visual Impact Assessment prepared by Richard Lamb & Associates dated December 2015 (copy attached);
- (c) Relevant background documents including:-
 - Broader Western Sydney Area – Structure Plan, Transport, Planning – Preliminary Analysis Report;
 - NSW Planning & Infrastructure – Major Project Assessment (Jacfin Horsley Park Project 10_0129 & 10_0130) – Director General's Environmental Assessment Report;
 - NSW Planning & Assessment Commission Determination Report – Concept Plan and Stage 1 Project: Jacfin Warehouse and Light Industrial Facilities, Horsley Park, Penrith LGA dated 28th October, 2013;
 - NSW Planning & Environment – Planning Report – Lot A Burley Road Horsley Park Interface Area dated May 2015.
- (d) The proponents Request for Secretary's Environmental Assessment Requirements (SEARs);
- (e) The proponents Environmental Impact Statement dated 4th November 2015 including the indicative Concept Proposal plans.

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The Concept Plan advanced is objectionable as it introduces the very impacts of incompatible land uses, building height, bulk, scale, siting, character and exposure to view of unsightly plant, equipment and operational aspects including 27 loading docks, together with attendant noise, lighting and other amenity impacts. Clauses 21 and 23 of SEPP WSEA seek to avoid.

Perhaps the inclusion of and apparent reliance on a redundant version of the Jacfin Concept Plan explains why the authors of the Oakdale South Industrial Estate proposal make such fundamental failures in relation to "interface" issues.

Perhaps.

The authors of and contributors to the suite of documents which form the EIS **ought** to have been aware of:-

- 1 The terms, relevance and purpose of Clause 21 and 23 of SEPP WSEA to manage the interface and protect adjoining residential land;
- 2 The machinations surrounding resolution of interface issues on the nearby and comparable Jacfin development;
- 3 The Department of Planning's engagement of O'Hanlon Design Pty Ltd to address interface issues;
- 4 The Director General's Major Project Assessment of the Jacfin Horsley Park Project (10_0129 & 10_0130 May 2013);
- 5 The content of and further work as recommended in the PACs determination of the Jacfin proposal (28th October 2013); and
- 6 The subsequent rezoning of the "buffer" land to *"retain acoustic and visual privacy for new and existing landowners and to meet minimum buffer requirements"*. (NSW Planning & Environment Report May 2015).

Given the existence of that relevant literature, it is inexplicable how the proponents could advance a proposal which contained such gross deficiencies and failures.

The attached submissions particularise some of the concerns held by the owners of the rural residential estate adjoining on land zoned E4.

The conclusion drawn is that the proposed Oakdale South Industrial Estate Concept Plan requires amendment to provide an adequate buffer between industrial development and rural residential land to satisfactorily mitigate amenity impacts.

Without amendment addressing the interface issues, the proposed Oakdale South Industrial Estate should not proceed.

Yours faithfully,

John Hancock

Encl.