

10 May 2022

Our Ref: 22/123110
Our Contact: Lisa Ho – [REDACTED]

Catriona Shirley
Senior Environmental Assessment Officer
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Ms Shirley,

Re: Bayside Council Submission: Raymond Avenue Multi Level Warehouse Matraville (SSD-31552370)

Thank you for the opportunity to comment on State Significant Development (SSD) application for a warehouse and distribution facility at 42-52 Raymond Avenue and 44A McCauley Street, Matraville in Randwick Local Government Area (LGA).

Council has reviewed the Environmental Impact Statement (EIS) that has been prepared by Urbis on behalf of Hale Capital Partners Pty Ltd to support this State Significant Development (SSD) application for the Warehouse and Distribution Facility. It is understood the proposal includes:

- Construction, fit out and operation of a two-storey warehouse and distribution centre comprising approximately 19,460m² GFA including:
 - 17,789m² of warehouse and distribution GFA; and
 - 1,671m² GFA of ancillary office space.
- Provision of 11 bicycle parking spaces, 6 motorcycle parking spaces and 101 car parking spaces at ground level.
- Approximately 2,250m² of hard and soft landscaping at ground level.
- Provision of one additional access crossover from Raymond Avenue.
- Provision of internal vehicle access routes, two-level central breezeway and loading docks.
- Provision of 1.8m metal palisade perimeter fencing.
- Site preparation including minor bulk earthworks.
- Upgrades to existing on-site infrastructure.
- Building identification signage.
- Operation 24 hours per day seven days per week.

The submission raises a number of issues regarding this development that council would like to see considered as part of this assessment and any subsequent consent.

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Risk and Traffic

The former City of Botany Bay Council implemented the *Denison Street Land Use Safety Study Review of Planning Controls* to examine potential risk along Denison Street, Hillsdale, due to the transportation of dangerous goods and its proximity to the Botany Industrial Park (BIP). The EIS does not provide any details on the type of goods to be transported to and from the site and what route it would use.

It is recommended the proponent confirm if the application will involve the transportation of dangerous goods along Denison Street during the construction and operation phase and provide this information if it has been omitted. This will better enable Council to undertake future strategic planning near Denison Street, based on the cumulative risk in the area. A copy of the study is available on council's website at:

<https://www.bayside.nsw.gov.au/services/development-construction/planning-our-city/plans-and-strategies/denison-street-risk-study>

Beauchamp Road is a classified State Road which comes under the control of Transport for NSW and provides a major thoroughfare to the Port Botany Container Terminal. As such since this development is proposing a 24hour per day operation. The frequency and type of vehicles which will service this development may adversely affect traffic flows along Beauchamp Road. Truck movements at the Port are increasing and it is recommended that a comprehensive traffic study be undertaken to ensure the proposal will have no major impacts on traffic flows along Beauchamp Road or the operation of the Port Facility.

Further there was a previous proposal by the State Government to construct a Cruise Liner Terminal at Yarra Bay which would significantly increase traffic volumes along Foreshore Road / Beauchamp Road / Bunnerong Road. While this Project has been temporarily suspended by the Government it could still become a reality in the future and should be considered with any Traffic Study.

Transport for NSW are currently considering options to upgrade Botany Road between Foreshore Road and Excel Street Banksmeadow to improve traffic flows in the area and in particular assist access into Port Botany. While this location is north of the development site it should be considered with any Traffic Study.

Port Botany is regularly undertaking works inside their site to improve the access and egress of container trucks into the Port. Again, NSW Ports should be consulted with any Traffic Study to ensure they have no upcoming upgrades that may affect traffic flows along Beauchamp Road.

The Owner of the Botany Goods Train Line (ARTC) have commenced a Project to duplicate the Rail Line from the Alexandra Canal Mascot to a location north of McPherson Street Banksmeadow (3km long track). This Project will not be completed until late 2024 and may generate construction traffic during the works therefore, the impacts of this Project should be included in any Traffic Study.

Flooding

There is a major Sydney Water Stormwater Channel / Pipeline located between Beauchamp Road and the Development Site. Appendix R - Civil Engineering report relies on the GIS information provided by Randwick Council to assess the flooding impacts which is not sufficient to address the flood impact on the adjoining sites.

As per the Birds Gully Flood study (Randwick Council 2018), this site is affected by overland flow flooding in the 1% and PMF events. The open channel is considered a floodway in major storm events. The proposed filling of 1.5m above the existing slab level, may redirect flow to the adjoining sites in a major storm event. It is critical to undertake a Flood Impact Study (based on the survey of the site and any new development adjacent to this site) to ensure the proposed development does not adversely affect any adjacent properties. The flood impact assessment shall be undertaken for all flood events up to the PMF event.

A Flood risk management plan shall also be prepared for all events up to the PMF event.

For any construction over/adjacent to the Stormwater Channel / Pipeline, the applicant shall obtain Sydney Water approval. Council requests a copy of the Flood impact assessment report and associated flood model shall be submitted to enable council to carry out a proper flooding assessment.

Impact on adjoining industrial neighbour (within Bayside LGA)

Part of the north western boundary of the site adjoins land within Bayside LGA and they typically comprise of smaller scale industrial development. The proposed development involves a significant building envelope (22m) and building footprint (over 19 000m²). As a result of the scale of this development, when viewed from the north western boundary, the proposed development is likely to present as a large monolithic built area with ineffective landscaping to reduce the apparent extensive bulk and scale in the development, particularly along the north western boundary of the site.

The proposed landscape plan does not include any landscaping along this boundary. Council recommends the inclusion of larger landscaped areas and setbacks along the north western boundary of the site to provide visual breaks and screening to buildings located within the development. In addition, non-reflective materials and colours will need to be included in the finishes for the development to reduce the potential for reflectivity and glare towards neighbouring industrial properties in Bayside as well as reducing visual impacts.

Lack of consultation

Council is concerned about the lack of consultation that has occurred in relation to this project, considering the potential impacts to the local community. Council requests ongoing consultation on this project and other projects in Port Botany and surrounds, to ensure adequate input is provided.

Botany industrial Park and the Three Ports SEPP area are covered by only Randwick and Bayside LGAs. Council does not consider it an onerous consultation exercise to notify both Councils for any SSDs or modifications proposed within this area, regardless of which Council has jurisdiction for the proposal – particularly when considering the nature of the proposals and potential impacts on our communities.

Impact of future uses on the site

It is understood the proposal is a speculative development without any tenants committed and the exact operational procedures of the site are not known at this time. The submitted air quality and noise and vibration reports are based on assumptions made regarding likely future uses. On this basis, council requests further detailed assessments to be carried out

based on future known uses operating on the site. Council requests further assessment to be carried out in relation to:

- Noise and vibration
- Air quality, emission, and odours

This will allow council to properly assess the impacts of proposal.

Other considerations

Council officers wish to express concern at the proposed signage and building illumination and the potential for adverse impacts on the amenity of nearby current and future residents. Illumination should be curtailed in terms of hour of illumination and/or illuminated display area.

It is not known whether the subject site is affected by a ground water exclusion zone, Council requests the EIS be updated to clarify whether the subject site is affected by ground water to allow us to adequately assess the impact of the proposal.

We trust that the Department will carefully consider this feedback on the exhibited EIS for this proposal. If you require further clarification, please do not hesitate to contact Lisa Ho, Senior Urban Planner [REDACTED].

Yours sincerely

A handwritten signature in cursive script, appearing to read 'Clare Harley'.

Clare Harley
Manager Strategic Planning