

6 April 2016

Deana Burn
Planning Officer
NSW Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Ms Burn

SUBMISSION TO STATE SIGNIFICANT DEVELOPMENT NO. SSD 15_7155 PROPOSED PRESTONS INDUSTRIAL ESTATE DEVELOPMENT AT KURRAJONG ROAD PRESTONS

We are writing on behalf of ALDI Stores and in relation to the State Significant Development (SSD) No. 15_7155 known as the Prestons Industrial Estate located on the land bound by Yarrunga Street, Bernera Road and Kurrajong Road, Prestons (the site). ALDI Stores operate the Prestons Distribution Centre located approximately 350m to the north east of the site at 10 Burando Road, Prestons (Lot 1 DP 1129090). As an important stakeholder ALDI is concerned that the proposal has the potential to result in significant adverse traffic impacts on the efficient operation of ALDI's Distribution Centre at Prestons.

Maintaining the effective operation of the Distribution Centre as well as ALDI Stores throughout NSW and the ACT is dependent on ALDI's efficient and unconstrained movement of its truck fleet. The matters raised in this letter are significant concerns of ALDI given the importance of service required along Yato Road/Burando Road and the potential substantial and detrimental traffic impacts of the proposed SSD and additional impacts of other nearby major industrial development on ALDI's operations. ALDI does not object to the proposed SSD in-principle subject to the matters contained within this letter being appropriately addressed by the applicant.

We have reviewed the following information in the preparation of this submission:

- Secretary's Environmental Assessment Requirements (SEARS) dated 11 September 2015.
- Architectural Plans prepared by AXIS Architectural dated November 2015.
- Environmental Impact Statement prepared by Urbis dated March 2016.
- Assessment of Traffic and Parking Implications (Traffic Report) prepared by Transport and Traffic Planning Associates dated March 2016 (Revision H).

A copy of Milestone's submission to Liverpool City Council (Council) relating to another nearby major industrial development at Prestons (DA-987/2015), which is at the time of writing currently under assessment by Council, is held at **Attachment A**. A copy of the further response from ALDI's Traffic Consultant, Colston Budd Hunt & Kafes Pty Ltd in regards to DA-987/2015 is held at **Attachment B**. A key concern relates to the cumulative traffic impact of all developments in the Prestons industrial area and required road design improvements.

1. Traffic Impacts on ALDI Distribution Centre Operation

1.1 Current and Future Operation of ALDI's Distribution Centre

ALDI's Distribution Centre at Prestons services 88 ALDI Stores throughout NSW and the ACT at present and has been designed to accommodate and service up to 200 ALDI Stores. The Distribution Centre generates 630 vehicle movements per day including 395 heavy vehicle movements. This equates to approximately 35-40 heavy vehicle movements currently per hour in peak periods. Heavy vehicles must be granted priority given the use of the site as a Distribution Centre.

Vehicle access to the ALDI Distribution Centre is via Yato Road and Burando Road only (refer to **Figure 1**). The reliance of a single vehicle access point to the ALDI Distribution Centre for all truck and staff vehicles therefore places a high importance on the continued peak operational performance of these roads.

As more ALDI Stores are constructed in NSW and ACT the traffic to and from the Distribution Centre will increase from currently 395 heavy vehicle movements per day to approximately:

- 475 to 515 heavy vehicle movements per day by 2018;
- 547 to 674 heavy vehicle movements per day by 2021; and
- 661 to 1,050 heavy vehicle movements per day by 2026.

Therefore ALDI is concerned of any development that occurs in Prestons industrial area that does not factor the increased transport capacity needs of ALDI into the future.

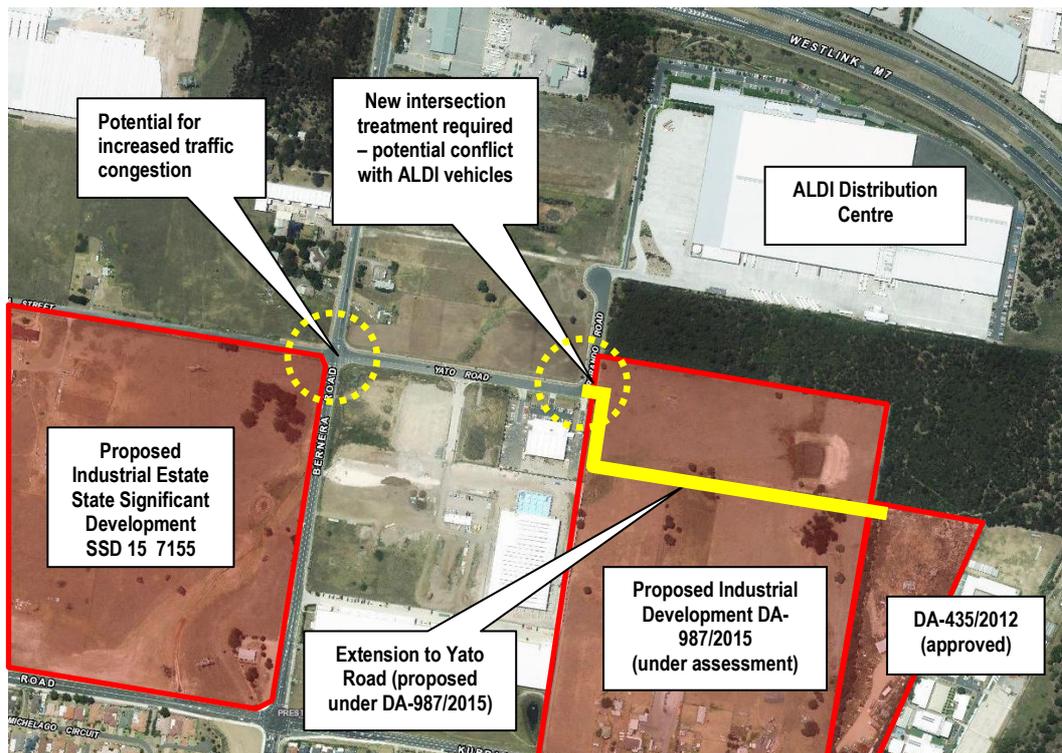


Figure 1: Aerial map
Source: Land and Property Information, SIX Maps 2016

1.2 State Significant Development No. 15_7155

The Traffic Report for SSD 15_7155 refers to the “Prestons Industrial Area Road Network and Traffic Assessment” prepared by Transport and Traffic Planning Associates dated March 2010. Whilst traffic survey results in the Traffic Report for the SSD are from 1 October 2015, the Traffic Report does not make any reference to recently approved development and Development Applications under assessment in the Prestons industrial area (refer to Section 1.3). It is therefore unclear whether the Traffic Report has contemplated the cumulative impact of the projected traffic generation from the other approved and proposed development in this part of Prestons. A thorough assessment of this traffic impact along with any required road improvements is requested to be provided by the applicant as part of the SSD Application.

Coupled with the other proposed and approved major industrial development near the ALDI Distribution Centre, the proposed SSD has the potential to significantly degrade ALDI’s operation over the short to long term during the site preparation, construction and operational phases of the development. Of primary concern for ALDI are ALDI’s heavy vehicles seeking to turn right out of Yato Road onto Bernera Road to access the M7 Motorway. The lack of a right turn signal for ALDI vehicles to turn onto Bernera Road from Yato Road poses a significant risk and adverse impact to ALDI’s operations as vehicles will be required to give way to increased traffic entering the intersection from Yarrunga Road.

Therefore any approval granted by the Department for SSD 15_7155 must require that the existing signalised intersection at Yato Road/Bernera Road is amended to include a designated right turn green arrow to ensure ALDI vehicles are guaranteed an acceptable level of service into the future. Other improvements to the road network may also be required.

1.3 Other Adjacent Development Applications

In addition to the proposed SSD, other DAs in the surrounding area that will also have the potential to significantly impact ALDI's Distribution Centre operations are:

- DA-435/2012 – “Development Application - Staged Industrial development incorporating: Stage 1: Bulk earthworks, site remediation, and construction of warehouse building (Factory A) to the rear of the site with temporary truck/vehicle access via Kurrajong Road. Stage 2: Construction of warehouse buildings (Factories B,C,D and E) on the remainder of the site, deletion of temporary access to Kurrajong Road and construction of rear access road, including associated landscape works”. The DA was lodged on 28 October 2011 and approved by Council on 4 July 2013.
- DA-987/2015 – “Construction of a new Industrial Warehouse facility consisting of 2 units & extension of Yato Road”. The DA was lodged with Liverpool City Council (Council) on 6 October 2015. DA not yet determined by Council.

Milestone on behalf of ALDI Stores is stakeholder regarding SSD 15_7155 and we request to be informed of any further information that is submitted to the Department by the applicant in regards to the proposed development.

Please contact the undersigned if you require any clarification of this matter.

Yours sincerely

Milestone (AUST) Pty Limited



Patrick Lebon
Associate



Lisa Bella Esposito
Director

Encl.

ATTACHMENT A

**SUBMISSION PREPARED BY MILESTONE (AUST) PTY LIMITED DATED 10 NOVEMBER 2015
TO LIVERPOOL CITY COUNCIL REGARDING DA-987/2015**

10 November 2015

Mr Shannon Rickersey
Team Leader – Development Assessment
Liverpool City Council
Locked Bag 7064
Liverpool BC NSW 1871

Dear Mr Rickersey

SUBMISSION TO DEVELOPMENT APPLICATION DA-987/2015 – CONSTRUCTION OF A NEW INDUSTRIAL WAREHOUSE FACILITY CONSISTING OF TWO UNITS AND EXTENSION OF YATO ROAD LOT A, B, C AND D DP 101475; LOT 1 DP 121122, 290 KURRAJONG ROAD, PRESTONS 2170; LOT 1 KURRAJONG ROAD, PRESTONS NSW 2170; LOT B, C AND D KURRAJONG ROAD, PRESTONS 2170.

Thank you for the opportunity to comment on the abovementioned Development Application (DA) for the abovementioned properties (proponent Charter Hall). We prepare this submission on behalf of ALDI Stores. We understand that the proposed development involves the construction of a new industrial warehouse facility consisting of two (2) units and a permanent extension of Yato Road for provision of vehicular access to the development site from the north west.

As you are aware, ALDI Stores owns and operates a Distribution Centre to the north of the development site (Lot 1 DP 1129090). ALDI is concerned that the proposed development and in particular, any new permanent roadway to the north western corner of the development site that will connect to Yato Road, has the potential to result in significant adverse or detrimental impacts to the operation of ALDI's Distribution Centre for the reasons outlined below.

Background

ALDI's Distribution Centre services 69 ALDI Stores throughout NSW and the ACT at present, but has been designed to accommodate and service up to 100 ALDI Stores.

The Distribution Centre generates 630 vehicle movements per day, including 330 heavy vehicle movements. During peak hours, this equates to approximately 30 heavy vehicle movements each hour. ALDI's business model relies on the timely and efficient daily delivery of household items and fresh produce to ALDI Stores throughout NSW.

Development consent for the Distribution Centre was granted by the Minister on 20 December 2007 under Part 3A (now repealed) of the Environmental Planning and Assessment Act, 1979.

Condition No. 18 in Schedule 2 of the development consent specified the following:

18. "Prior to the commencement of operations, the Proponent shall obtain development consent from Council for the permanent access road to the site (including intersection treatment at Bernera Road and Yarrunga Street). Operations shall not commence on site until the permanent access road has been constructed to the satisfaction of Council, and dedicated as a public road."

The cost and construction of this road known as Yato Road and associated works was borne entirely by ALDI Stores in the form of Section 94 contributions, as required by Condition No. 9 in Schedule 2 of the development consent, as follows:

9. "Prior to the commencement of construction, the Proponent shall pay Council \$2,384,969 for the provision of infrastructure and services associated with the project, in accordance with the Liverpool Contributions Plan 2001 (as amended), or alternatively enter into an agreement that is satisfactory to both parties".

On 14 July 2008, Liverpool City Council (Council) granted development consent to DA-529/2008/A for the construction of this public access road with associated intersection and subdivision. This road is an extension to the east of Yarrunga Street

at its intersection with Bernera Road and is known as Yato Road, becoming Burando Road as the road bears north, terminating at a cul-de-sac at the northern end of Burando Road adjacent to ALDI's site entry.

Traffic Impacts to ALDI Distribution Centre Operations

The proposed development subject of this Development Application comprises the construction of two industrial warehouses with ancillary office space subject to the provision of a new public roadway intersecting Yato Road near the corner of Yato and Burando Roads and a vehicle entry/exit point off Yato Road, approximately 120 metres to the south of the driveway entrance to the ALDI Distribution Centre. The Yato and Burando Roads link is the only vehicular accessway to ALDI's site and as such is both the incoming and outgoing route taken by ALDI delivery trucks.

There is potential for the proposed development to have significant traffic implications to the operation of the ALDI Distribution Centre. Refer to **Figure 1** below.

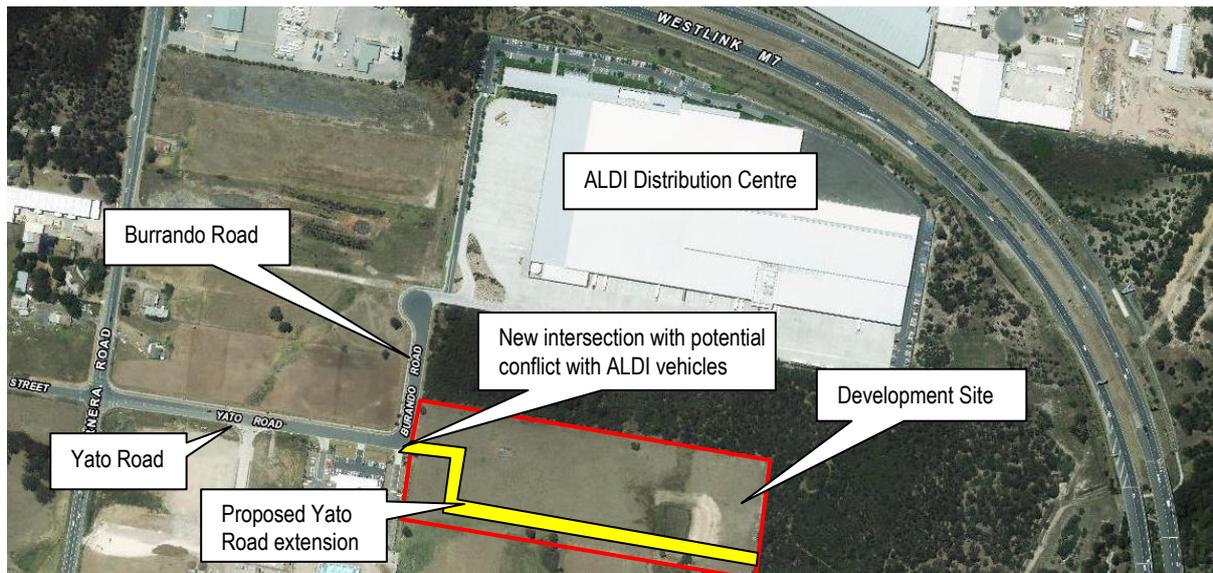


Figure 1: Aerial photo with proposed road access overlay
Source: SIX Maps 2015, overlay prepared by Milestone

As outlined above, the Distribution Centre generates approximately 30 heavy vehicle movements per hour during peak periods. In accordance with the Traffic Impact Assessment Report prepared by Ason Group dated 30 September 2015 submitted with the Development Application, the proposed development is expected to generate 52 vehicles per hour in during morning and evening peak hours. No details are provided on the number of heavy vehicle movements during these periods. We request clarification on the number of heavy vehicle movements that this proposal will generate.

Furthermore, the relatively short queuing capacity of Burando Road for ALDI delivery trucks when compared to the more substantial length of the new roadway will detrimentally affect the queuing of outgoing ALDI trucks should they be required to wait for clear passage to turn west into Yato Road at the new intersection.

There is no detailed design for the proposed future road within Council's DCP 2008 or any of Council's adopted Policies. As such, any future road as part of this proposed development should be a separate Development Application. This separate process is required to enable a thorough assessment of the environmental impacts for surrounding properties once the detailed design has been completed. We acknowledge that civil drawings have been submitted with this Development Application. The extension of Yato Road and the bend to the south close to Burando Road are irregular as shown on the Liverpool Local Environmental Plan 2008 (LEP 2008) land zoning map (Refer to **Figure 2**). In particular there may be restricted sight lines for traffic turning from Burando Road into Yato Road.

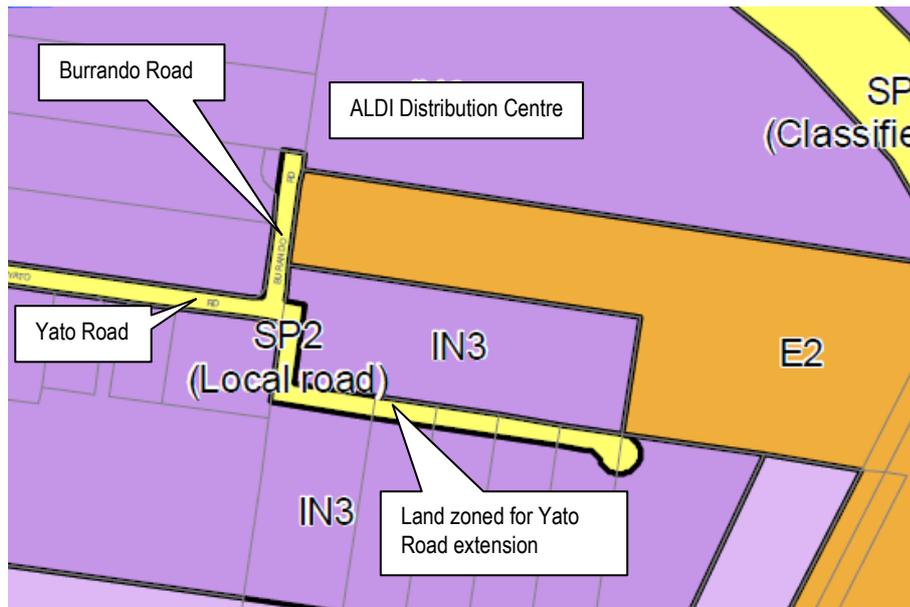


Figure 2: Land Zoning Map
Source: LEP 2008

For these reasons, it is critical that the final design of any extension to Yato Road and its intersection with Yato and Burando Road is resolved in a manner that ensures no negative impacts to ALDI's operations. Given that ALDI is a key stakeholder in the proposed development, we would appreciate an opportunity to review and comment on the necessary specific details of this future intersection and road construction prior to the determination of this Development Application.

Surrounding Development

We are aware that a deferred commencement approval (DA-435/2015) was granted by Council on 4 July 2013 for the construction of five warehouse factories in two stages, in addition to preliminary earthworks and site remediation. The development proposed extension of Yato Road in accordance with the LEP 2008 SP2 zoned land (refer to **Figure 3**). During the notification period, we prepared a submission on behalf of ALDI Stores dated 1 December 2011 raising traffic issues. The development was approved on the condition that Stage 2 of the development, which included the extension of Yato Road would be subject to approval under a separate Development Application. We reiterated ALDI's concerns to Council regarding the traffic impacts of the Yato Road extension in a further submission dated 16 July 2013. Our understanding from discussion with Team Leader, Shannon Rickersey on 9 November 2015, is that no Development Application for Stage 2 has been lodged with Council to date. We are highly concerned of the cumulative traffic impacts of this development proposal and the approved development subject of DA-435/2012 on the intersection of Burando Road and Yato Road and request that a revised Traffic Impact Assessment be undertaken which considers the traffic generated from the development approved under Development Consent DA-435/2015.

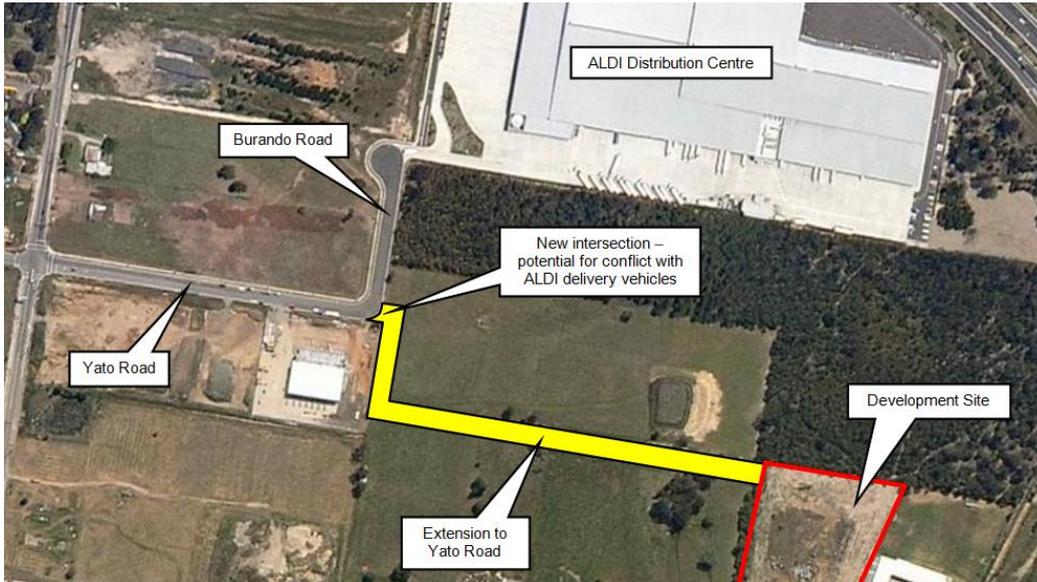


Figure 3: Development proposed for DA-435/2015
Source: SIX Maps, 2015

Conclusion

The matters raised within this letter are considered by ALDI to be significant concerns, as the proposed industrial development and associated future roadway have the potential to provide substantial detrimental traffic impacts to the operation of the existing ALDI Distribution Centre to the north of the development site.

Maintaining the effective operation of the Distribution Centre as well as ALDI Stores throughout NSW is dependent on ALDI being able to move their delivery truck vehicle fleet efficiently. Liverpool City Council in conjunction with ALDI and the applicant must adequately address the design of any future extension to Yato Road and its intersection with Yato and Burando Roads.

We request further information and analysis in respect to the volume of heavy vehicles generated during peak periods for the proposed development; detailed design of the proposed new road and intersection; and a revised Traffic Impact Report which considers the traffic generated from the approved development subject of DA-435/2015 on the Yato Road and Burrando Road intersection and assesses the impact of future developments that will utilise the Yato Road extension.

We welcome the opportunity to further discuss the contents of this letter with Council's Officers. Please do not hesitate to contact the undersigned should you require further clarification or details of the issues raised.

Yours sincerely

Milestone (AUST) Pty Limited

Sohini Sen
 Town Planner

Lisa Bella Esposito
 Director

ATTACHMENT B

**SUBMISSION PREPARED BY COLSTON BUDD HUNT & KAFES PTY LTD DATED 4 APRIL 2016
REGARDING TRAFFIC IMPACTS OF PROPOSED INDUSTRIAL DEVELOPMENT AT 290
KURRAJONG ROAD, PRESTONS (DA-987/2015)**

Colston Budd Rogers & Kafes Pty Ltd

as Trustee for C & B Unit Trust
ABN 27 623 918 759

Our Ref: JH/10179/jj

4 April, 2016

Transport Planning
Traffic Studies
Parking Studies

Aldi Stores – Prestons Region
c/- Milestone (Aust) Pty Limited
93 Norton Street
LEICHHARDT NSW 2040

Attention: Lisa-Bella Esposito

Email: lisa@milestonemanagement.com.au

Dear Madam,

**RE: PROPOSED INDUSTRIAL DEVELOPMENT,
290 KURRAJONG ROAD, PRESTONS (DA-987/2015)**

1. As requested, we are writing to set down our comments in relation to the above development. The site is located north of Kurrajong Road and east of Bernera Road at Prestons. It has frontage to Kurrajong Road and Burando Road.
2. The proposed development is for two industrial buildings of some 25,550m², comprising warehouses (25,000m²) and associated offices (550m²). Some 128 parking spaces are proposed. Vehicular access is proposed via an extension to Yato Road, east from the existing junction at Yato Road and Burando Road.
3. The application notes that the proposed development is the initial part of a future larger development which will ultimately comprise some 78,050m², including some 75,950m² warehouses and 2,100m² offices.
4. There is also another site ("Land A") east of the site, which would, if developed in the future, have access from the Yato Road extension. A potential scale of development on Land A would be some 17,000m² industrial, with a similar warehouse/office mix to that proposed in the subject development application.
5. Future development of other lots within the precinct would likely be accessed from Kurrajong Road. The application notes that the planning controls do not

Colston Budd Rogers & Kafes Pty Ltd

permit large vehicle access to the precinct from Kurrajong Road. Therefore, with future development of the precinct, light vehicles would access the development from Yato Road and Kurrajong Road. Heavy vehicles would access the development from Yato Road.

6. Aldi's existing distribution warehouse is north of the site, accessed from Burando Road. Burando Road currently intersects Yato Road adjacent to the site, at a bend. There is a Sydney Water depot on the southern side of Yato Road, with access from Yato Road, opposite Burando Road.
7. We have reviewed the traffic analysis provided in the traffic report¹ submitted with the development application for the proposed development. It considers the future operations of the intersections of Yato Road with Bernera Road (traffic signals) and Burando Road (unsignalised t-intersection with Yato Road extended east).
8. The estimates of traffic generation and the assessment of the future intersection operations presented in the report appear to be reasonable.
9. As noted above, Yato Road would be extended to the east, for access to the subject development. Extending Yato Road would form a t-intersection with Burando Road. Traffic in Burando Road would give way to traffic in Yato Road.
10. The extension of Yato Road would bend south, just east of the intersection of Yato Road with Burando Road. The proposed configuration of Yato Road and the bend to the south close to Burando Road appear to be unusual. There would be restricted sight distance for traffic turning from Burando Road onto Yato Road, due to the bend in the Yato Road extension.
11. Traffic exiting Burando Road would therefore have limited view of traffic from the east in Yato Road. The application has not demonstrated that appropriate sight lines will be provided for the proposed new intersection. We have previously raised this matter in a letter regarding an earlier application on 30 November 2011 (copy attached).

¹ "Traffic Impact Assessment Report Proposed Warehouse Development 290 Kurrajong Road, Prestons."
Prepared for Charter Hall Pty Ltd by Asongroup, 30 September 2015.

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12. As noted in that letter, it may be appropriate to relocate any bend in Yato Road further east, away from the Burando Road intersection. Alternatively, an alternative road design/intersection control may be appropriate, such as a roundabout at Yato Road/Burando Road, with a "Y" configuration.
13. We trust the above provides the information you require. Finally, if you should have any queries, please do not hesitate to contact us.

Yours faithfully,

COLSTON BUDD ROGERS & KAFES PTY LTD



J Hollis
Director

Colston Budd Hunt & Kafes Pty Ltd

as Trustee for C & B Unit Trust
ABN 27 623 918 759

Our Ref: JH/8511/jj

30 November, 2011

Transport Planning
Town Planning
Retail Studies

Aldi Stores – Prestons Region
Locked Bag 7055
LIVERPOOL NSW 2170

Attention: Tracy Armstrong
Email: tracy.armstrong@aldi.com.au

Dear Madam,

**RE: PROPOSED INDUSTRIAL DEVELOPMENT,
1 KURRAJONG ROAD, PRESTONS (DA 435/2012)**

1. As requested, we are writing to set down our comments in relation to the above development. The site is located north of Kurrajong Road and east of Bernera Road at Prestons. It has frontage to Kurrajong Road.
2. The proposed development is for an industrial building comprising a factory and associated offices and car parking. The building would be some 7,150m² and 101 on-site parking spaces are proposed. Vehicular access is proposed from Kurrajong Road. Ultimately, access would be provided from an easterly extension of Yato Road, which would connect to the development at the north-western corner of the site. However, we understand that the current application does not propose to construct this road.
3. Similarly, the application discusses the use of the remainder of the site for similar purposes in four future buildings, providing an additional 7,118m². We understand that these buildings are not proposed as part of this current application.
4. Ultimately, access to the development is shown from a new easterly extension of Yato Road which would connect to the development at the north-western corner of the site. Once this road is constructed, the Kurrajong Road access would be closed.

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5. The extension of Yato Road would bend south, just east of the intersection of Yato Road with Burando Road. We understand that no plans have yet been prepared for the extension of this road.
6. The extension of Yato Road and the bend to the south close to Burando Road appear to be unusual. There may be restricted sight distance for traffic turning from Burando Road onto Yato Road, due to the bend in the Yato Road extension.
7. In the design of the Yato Road extension, consideration should be given to providing appropriate sight lines for traffic turning from Burando Road into Yato Road. It may be appropriate to relocate any bend in Yato Road further east, away from the Burando Road intersection.
8. We would therefore suggest that plans of the Yato Road extension should be prepared to address these concerns.
9. We trust the above provides the information you require. Finally, if you should have any queries, please do not hesitate to contact us.

Yours faithfully,
COLSTON BUDD HUNT & KAFES PTY LTD



J Hollis
Director