

Your ref: SSD 6954
File no: MC-15-490

8 September 2015

Industry Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Thomas Piovesan

Dear Thomas,

**Re: SSD 6954 IKEA Multi-Function Logistics Unit, Sydney Business Park,
Marsden Park**

I refer to your correspondence dated 31 July 2015, requesting that Council provide comments on the proposed State Significant Development lodged under Part 4 of the *EP&A Act 1979* for the IKEA Multi-Function Logistics Unit.

For your information, Council Officers met with the Proponent on 3 September 2015 to discuss the proposal.

The proposal has been reviewed by Council officers and is not supported in its current form. A range of issues have been raised and listed in **Attachment A** to this letter, which are requested to be addressed to Council's satisfaction by the Proponent before any determination of the proposal is made by the Department. Council requests the opportunity to provide conditions of consent prior to the determination of the application.

If you would like to discuss this matter further, please contact me on 9839 6228.

Yours faithfully,



Judith Portelli
Manager Development Assessment

ATTACHMENT A

The following concerns are requested to be addressed:

Planning

1. It is noted that DA-15-1088 for bulk earthworks was approved on 28 August 2015, however this DA does not pre-empt the approval of any future DAs on this site such as 'pre-approval' of a variation to the indicative layout plan. Furthermore, DA-15-1088 approved bulk earthworks as per the Extent of Works Plan (prepared by Calibre Consulting, Reference X11227.23-DA_3, Revision 4, dated 10 July 2015). Trees and vegetation outside of the 'extent of works' area are not approved for removal in DA-15-1088.
2. The EIS states that although this site was assessed for the purpose of bulk earthworks in DA-15-1088, that civil infrastructure works have been incorporated as part of this application. As this is the case, we note that the Department will re-assess the proposed works in light of flora, fauna, aboriginal archaeology, contamination, acid sulphate soils, tree removal, etc.
3. As detailed in Council's correspondence dated 3 June 2015, it was identified that a portion of the subject site is zoned SP2 Infrastructure (Local Road) under State Environmental Planning Policy (Sydney Region Growth Centres) 2006. 'Warehouse and distribution centres' are not permissible in the zone. The EIS incorrectly states that the entirety of the site is zoned 'IN1 General Industrial.' We trust that the Department will address this zoning issue accordingly.
4. In relation to the planting in the bio-retention system, Page 47 of the EIS states that "a horticulturalist is to confirm that the selected plants will grow well in the design location and site configuration." We recognise this and recommend that this is addressed in a condition of consent of any future development consent.
5. The proposed landscape plans demonstrate a suitable design of trees and plantings, however concern is raised that the proposed pot sizes are not satisfactory. Therefore, suitably sized trees, shrubs and plantings are required to be demonstrated on the plans which demonstrate that the resulting planting will suitably complement the proposed building and reach maturity in a suitable timeframe.
6. As raised in Council's correspondence dated 3 June 2015, the overall building design was considered to result in a poor presentation, and this concern remains as the proposal in its current is not considered to demonstrate high quality building design. This is particularly the case given the proposal is almost double the permitted building height and provides a poor built form which is considered to contravene the objective of clause 4.3 Height of Buildings as follows:

“(d) to establish parameters for and promote a high quality built form.”

It is recognised that the central building form is the result of the internal functionality of the high bay storage system sought by the Proponent. However, this internal system does not constrain the exterior presentation of the building, which is capable of providing a high quality built form, as is the expectation of other recently approved warehouse buildings within the Marsden Park Industrial Precinct. To maintain the quality of the new built forms in this precinct, the design of the building is required to be improved so as to demonstrate design excellence and comprise suitable architectural design measures. The proposal in its current form is not supported.

7. The proposed boundary fencing and retaining walls are to be clearly demonstrated on the plans.

Traffic

8. We trust the proposal was also referred to the RMS for their comments.
9. The proposal is not supported as it does not satisfy the car parking requirements of the BCC Growth Centre Precincts DCP 2010. The application is required to be amended to include “provisional” car parking spaces to provide a compliant number of parking spaces. These spaces are recommended to be provided around the perimeter of the building or site. The purpose of this is to demonstrate that should the site be occupied in the future with a higher level of staff/visitors: that parking is capable of being provided within the site. This consideration is applied to all development applications in the Marsden Park Industrial Precinct, to ensure that the future operation of this precinct is capable of absorbing staff/visitor parking demands on site, and therefore that the cumulative parking demand of this Precinct is not dependant on street parking.

This is particularly the case for the subject site which is a battle-axe allotment, and therefore does not benefit from street parking directly adjacent to the site boundary.

Should there be a shortfall of on-site car parking spaces, it is recommended that a condition of consent is imposed on any development consent which limits the number of staff permitted on site at any one time to the number of on-site car parking spaces.

S94 Contributions

10. The EIS (Section 4.7) states that *“Sydney Business Park anticipates that relevant developer contributions will be applied to this application in accordance with these documents. Sydney Business Park will be responsible for payment of these contributions as part of their agreement to sell the site to IKEA.”*

If there is an arrangement between Sydney Business Park and the applicant regarding contributions, that is a matter between those parties.

11. Council entered into a VPA with Sydney Business Park, but the obligations for contributions only apply to infrastructure that was being delivered as Stage 1 of the development. As such, contributions shall be levied for the IKEA Multi-Function Logistics Unit development in accordance with Council's Section 94 Contributions Plan No. 21 – Marden Park Industrial Precinct.

Engineering

12. With regard to the road pattern variation, please note that DA-15-1088 for bulk earthworks was approved on 28 August 2015, however this DA does not pre-empt the approval of any future DAs on this site.
13. The EIS indicates that this proposal does not seek to obtain an Occupation Certificate (OC) for the warehouse until proposed Road No. 5 is constructed and dedicated. The Proponent is to ensure that this timing is correct, to ensure that Road No. 5 is completed prior to the issue of any OC so as to ensure that vehicular movements (particularly trucks) do not rely on South Street.

Should the operation of this proposal rely on utilising South Street, it may require upgrading by the Proponent to accommodate the activities associated with truck loading/movements.

Stormwater Drainage

1. Calibre Estate stormwater design

- a) The XPRAFTS model provided is not for the study area. The correct model is to be provided to verify basin and culvert sizing.
- b) The Calibre design flows for culvert M1.9 are significantly different to those quoted for the precinct planning. A full catchment plan and the correct hydrologic model is required to confirm the design flows for this culvert. There has been a change in the catchment draining to this culvert as a result of more detailed post precinct planning investigations (see the attached Existing Conditions Catchment Plan prepared by J. Wyndham Prince, reference 109506-04_SKW403, Issue A, Dated 12 May 2015). The design invert levels for this culvert are significantly lower than those assumed for the S94 design concepts. Proposed concept design levels/longsection are required for the downstream channel and basin to demonstrate that the proposed culvert levels work with the proposed downstream infrastructure.

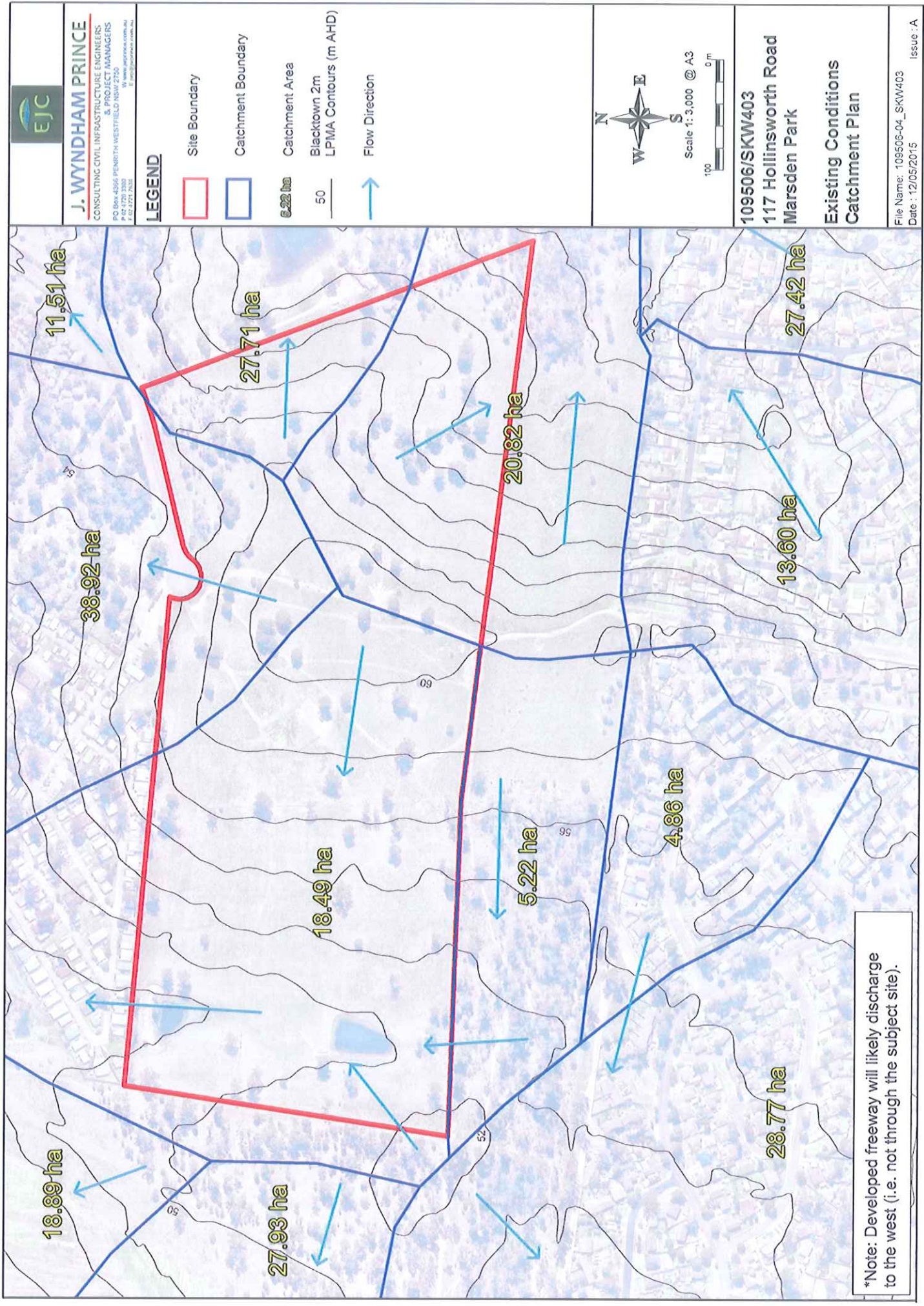
- c) The HECRAS model is not set up correctly. Additional sections are required between the culvert and the upstream and downstream boundary sections.
- d) The capacity of the existing culvert under South Street needs to be verified to ensure the proposed basin outlet operates hydraulically as intended.
- e) The proposed lot layout plan appears to delete a zoned precinct road just east of the IKEA site. Confirmation is required that this is the case and appropriate DCP and SEPP amendments are completed in due course. If this road is not deleted in future, then the size of the bio-retention in Basin B will need to be increased. The design of basin B should allow for the additional road treatment area to ensure either case can be accommodated. The precinct planning results nominated a treatment area of 800m² instead of the 550m² in the current design.
- f) High flow bypass is to be included in the model. The reported 100% capture of gross pollutants is not considered realistic.
- g) The MUSIC model provided does not include Road 5 draining to basin E. The nominated treatment area appears low relative to the size of the road catchment. Details to be included in MUSIC model.
- h) Bio-retention details to be consistent with MUSIC modelling.
- i) There is no supporting information for the stream stability assessment. Model data files and associated calculations of critical flow threshold are required to verify the statement made in the report. A combined assessment including the proposed IKEA site measures is acceptable.
- j) The existing dam embankment should be reconstructed to ensure its long term stability. It is not clear what the extent of the estate civil works are around basin B and South Street. Dam break assessment will be required prior to construction approval.
- k) Access to basin B is to be provided from South Street. Interim right of way or easement for access to be provided until future road widening occurs.
- l) Details are required to show how proposed basin B design fits with the proposed IKEA site works. Piped and overland flows from the IKEA site should be directed to bypass the proposed bio-retention in basin B.
- m) Soil and water management measures such as sediment basins to be designed for the 90th percentile 5 day rainfall as a minimum to minimise impacts on the sensitive downstream environment. Management measures to be industry best practice complying with EPA requirements and maintained in effective operating condition at all times.

- n) Council's asset design staff are currently progressing the design of basin B to mitigate stormwater impacts on the downstream conservation area. Design of basin B and associated works to be approved by Council's manager asset design prior to construction approval.

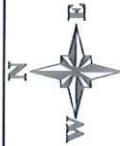
2. Cardno Site stormwater design

- a) The proposed basin B detention basin is to be constructed prior to occupation of the Ikea site.
- b) The design makes no provision for runoff from the adjoining catchment area to the east. The bulk earthworks plans under DA-15-1088 show some indicative diversion drains along the eastern boundary and these should be shown on the plans. These drains should be sized to convey the existing conditions 100 year ARI flows.
- c) The bio-retention system also relies on effective plant growth to achieve the modelled treatment efficiencies. The current configuration makes it problematic that the plants will receive enough direct sunlight to grow well. A horticulturalist is to confirm that the selected plants will grow well in the design location and site configuration.
- d) The majority of the site drainage flows into the proposed bio-retention system. This can lead to potential scouring, additional hydraulic loading and increased maintenance and renewal requirements. The design of the system shall document responses to these issues and appropriate 88B instruments registered to ensure effective operation of the system.
- e) Landscaped areas of the site that drain to the bio-retention system are to be included in the MUSIC model.
- f) The typical sections show areas of the site graded to flow onto adjoining properties. The site grading is to be amended to only direct flows onto adjoining properties at legal points of discharge.
- g) The current design grading near pit B03/1 would result in overflows onto adjoining lot and transmission tower. Overflows from this area to be directed to estate basin B and grading amended accordingly to limit water depths in driveway area.
- h) Pipe line A01 to be relocated to be clear of proposed basin B bio-retention area. Overland flows from Ikea site to be directed away from basin B bio-retention area.
- i) Interface details between site works and basin B to be provided.
- j) Soil and water management measures such as sediment basins to be designed for the 90th percentile 5 day rainfall as a minimum to minimise impacts on the sensitive downstream environment. Management measures to be industry best practice

complying with EPA requirements and maintained in effective operating condition at all times.



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Scale 1:3,000 @ A3
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109506/SKW403
117 Hollinsworth Road
Marsden Park

Existing Conditions
Catchment Plan

File Name: 109506-04_SKW403
Date: 12/05/2015 Issue: A