

MODIFICATION REQUEST: MP 07_0093 MOD 2 Modification to development of Lot 5 of Interlink Industrial Estate, Erskine Park

Lot 5 DP1124329 (formerly part Lot 141 DP 843899) Mamre Road, Erskine Park

Proposed by Goodman Limited



Director-General's Environmental Assessment Report Section 75W of the *Environmental Planning and Assessment Act 1979*

February 2012

© Crown copyright 2012 Published February 2012 NSW Department of Planning & Infrastructure www.planning.nsw.gov.au

Disclaimer:

While every reasonable effort has been made to ensure that this document is correct at the time of publication, the State of New South Wales, its agents and employees, disclaim any and all liability to any person in respect of anything or the consequences of anything done or omitted to be done in reliance upon the whole or any part of this document.

EXECUTIVE SUMMARY

On 20 December 2007 the Minister for Planning approved a project application from Goodman International Ltd to develop 4 warehouse/distribution and light manufacturing facilities on part of the Interlink Industrial estate, as Erskine Park. The project approval related to three lots within the industrial estate and involved the following:

- development of a warehouse and distribution facility on Lot 1 to be developed in 2 stages, used by Linfox;
- development of a light industrial and distribution facility for Ubeeco Packaging Solutions Pty Ltd on Lot 2;
- development of a warehouse and distribution facility for Allied Pickfords Pty Ltd on Lot 5A; and
- development of a light industrial/warehouse and distribution facility for an unspecified future end user on Lot 5B.

The development of Lots 1 and 2 has been completed. Lot 5 is vacant however bulk earthworks have been undertaken.

On 11 November 2011 the proponent Goodman Limited, submitted a request to modify the project approval (MP07_0093) pursuant to section 75W of the Act. On 30 January 2012 the proponent submitted amended plans for the modification application and on 6 February 2012 the proponent submitted an addendum to the environmental assessment report for the modification application.

The proponent is seeking to modify the project approval, in respect to the development of Lot 5, including the following:

- amalgamation of the two approved buildings on Lot 5 into a single building with a total floor space of 31,188m² (an increase of 10,418m²) to contain three units;
- the construction of the building on Lot 5 in two stages with Unit 1 to be built as Stage 1 and Units 2 and 3 as Stage 2;
- the use of proposed Unit 1 by Jeminex, an industrial safety work wear supplier for manufacturing as well as warehousing and distribution; and
- provision of up to 291 car parking spaces on Lot 5, an increase of 124 car parking spaces.

A copy of the request for modification was placed on the Department's website. No public submissions have been received.

Submissions were received from Penrith City Council and Roads and Maritime Services (RMS) including comments in respect to visual impacts, landscaping, parking and road widening.

The key issues considered in the assessment of the modification were:

- · compliance with relevant EPIs, policies and guidelines;
- increase in gross floor area;
- bulk and scale of the modified development;
- visual amenity/impacts; and

• traffic and parking provision.

The department is satisfied that these key issues have been resolved or that any outstanding matters can be appropriately dealt with by means of inserting additional conditions of approval 21A, 22A and 24A, relating to submission of a parking review prior to stage 2 of the development on Lot 5; and submission of details of external finishes and a final landscape plan.

The department is of the view that the application to modify the project application approval may be considered and approved as an application to modify a project approval under section 75W of the EP&A Act given that:

- the proposed modifications do not alter the purpose of the project; and the modified development will remain as the construction of warehouse distribution centres with ancillary industrial or manufacturing activities and with construction of associated infrastructure; and
- the proposed modifications would involve minimal environmental impact and the issues that arise from consideration of the modification request are generally consistent with the issues considered during the assessment of the original project application.

1. BACKGROUND

This report is an assessment of a request to modify the project approval to MP 07_0093 for warehouse/distribution and light manufacturing facilities, on the Interlink Industrial estate at Erskine Park.

This site is located approximately 12km east of Penrith within Penrith local government area. The Interlink estate is part of the Erskine Park employment area and is within the Western Sydney Employment Area (see Figures 1 and 2).

On 20 December 2007, the then Minister for Planning approved the construction and use of 4 warehouse/distribution and light manufacturing facilities and provision of associated infrastructure, on part of the Interlink Industrial Estate. This included a warehouse distribution facility for Linfox on Lot 1 and a light industrial and distribution facility for Ubeeco Packaging Solutions on Lot 2. A distribution facility for Allied Pickfords was also to be constructed part of Lot 5.

On 20 February 2011, the Executive Director, as delegate to the then Minister for Planning approved Modification no. 1 to this approval. This comprised minor changes to the approved site layout of the Stage 2 expansion area on Lot 1. It did not change the development approved on Lot 5, which is now subject of the current modification application.

Development of Lots 1 and 2 for Linfox and Ubeeco Packaging have been completed. Bulk earthworks have been completed over Lot 5 and the development site is vacant.

Since the project approval, the proposed tenant, Allied Pickfords Pty Ltd has withdrawn from its commitment to occupy one of the approved buildings on Lot 5. The proponent therefore seeks to modify the approval to amalgamate the 2 approved buildings on Lot 5 into a single building containing 3 units. The largest of the 3 units, Unit 1, is to be constructed as Stage 1 and is proposed to be used by Jeminex, an industrial safety work wear supplier, for manufacturing as well as warehousing and distribution. Stage 2 will involve the construction of the 2 remaining units on Lot 5, where future uses or tenants of these units are finalised.



Figure 1: Project Location

2. PROPOSED MODIFICATION

2.1 Modification Description

On 11 November 2011 the proponent Goodman Limited, submitted a request to modify the project approval (MP07_0093) pursuant to section 75W of the Act.

On 30 January 2012 the proponent submitted amended plans for the modification application and on 6 February 2012 the proponent submitted an addendum to the environmental assessment report for the modification application.

The land to which the project approval relates is now lots 1, 2 and 5 DP 1124329. Only development on lot 5 is proposed to be amended by this modification request.

4

Bulk earth works have been completed and lot 5 is vacant. The original project layout is shown in **Figure 2**.



Lot 5 DP 1124329

Figure 2: Approved Project Layout

The original approval related to lots 1, 2 and 5 on this site and involved the following:

- development of a warehouse and distribution facility for an unspecified end user on Lot 1 to be developed in 2 stages;
- development of a light industrial and distribution facility for Ubeeco Packaging Solutions Pty Ltd on Lot 2;
- development of a warehouse and distribution facility for Allied Pickfords Pty Ltd on Lot 5A; and
- development of a light industrial/warehouse and distribution facility for an unspecified future end user on Lot 5B.

The construction of buildings on lots 1 and 2 has been completed, with the warehouse and distribution facility on lot 1 is occupied by Linfox Logistics, and the manufacturing and warehousing facility on lot 2 occupied by Ubeeco Packaging Solutions.

Since the project approval, the proposed tenant, Allied Pickfords Pty Ltd has withdrawn from its commitment to occupy the approved building on Lot 5.

The proponent therefore seeks to modify the approval in the following manner:

- amalgamation of the two approved buildings on Lot 5 into a single building with a total floor space of 31,188m² (an increase of 10,418m²) with three units;
- the construction of the building on Lot 5 in two stages with Unit 1 to be built as Stage 1 and Units 2 and 3 as Stage 2;
- a finished floor level increase of 200mm to height of 39.7m;
- provision of up to 291 car parking spaces on Lot 5 (228 parking spaces and 63 provisional parking spaces), an overall increase of 124 car parking spaces on Lot 5;
- the use of proposed Unit 1 by Jeminex, an industrial safety work wear supplier for manufacturing as well as warehousing and distribution. The manufacturing process will involve embroidery of industrial safety wear prior to distribution. Jeminex will employ approximately 100 staff;
- landscaping along the setback to Mamre Road provided as part of Stage 1 of the development.

Figure 3 below indicates the proposed modified layout on lot 5. **Figure 4** indicates the proposed modified elevations of this building.

It is noted that the environmental assessment submitted with the modification application also indicates that approval is sought for the fit out of unit 1 and associated work including business identification signage. However, no fitout plan has been submitted with the application and only indicative signage details have been provided.

The fitout of unit 1 may potentially be dealt with under the provisions of Part 5 of State Environmental Planning Policy (Exempt and Complying Development Codes) 2008, where internal alterations for light industry and warehouse /distribution centres may be carried out as complying development and where this involves an area greater than 1000m² subject to compliance with specified BCA provisions (access and egress, sanitary and other facilities, light and ventilation).

NSW Government Department of Planning & Infrastructure

Existing condition 23 of the project approval requires written approval of the Director-General for signage details, which are to be prepared in consultation with Council and RMS. The proponent will therefore need to provide details of signage for the Director-General's sign off at a later date.



Figure 3: Modified Layout

NSW Government Department of Planning & Infrastructure





Figure 4: Modified elevations (Mamre Road)

NSW Government Department of Planning & Infrastructure

Table 1: Key elements of the modification

Element	Approved Development	Modified Development
Site area • lot 5 • lots 1, 2 & 5	56,192m ² 181,889m ²	56,192m ² 181,889m ²
Gross floor area Over lot 5 only • Warehouse • Office/lobby	2 units (units 5a & 5b) 19,380m ² 1,350m ²	3 units (units 1, 2 & 3) 28,308m ² 2,880m ²
• Total	20,770m ²	31,188m ² (additional 10,418m ²)
Over total site area for MP07_0093 Lots 1, 2 & 5 • Warehouse • Office • Total	79,380m ² 3,590m ² 82,970m ²	88,308m ² 5120m ² 93,388m ²
Site coverage (including awnings)		
• lots 1, 2 & 5	50.8%	53.9%
Car parking spaces ● lot 5	167 spaces	291 spaces (including 63 provisional parking spaces)
 lots 1, 2 & 5 	534 spaces	658 spaces
Height	Unit 5A = 13.7m Unit 5B = 12.4m	Units 1, 2 and 3 = 13.7m
FFL/SSL	39.50	39.70 +/- 0.5m

3. STATUTORY CONTEXT

3.1 Modification of the Minister's Approval

The application seeks to modify the project approval under section 75W of the Act in the manner listed above, in section 2.1.

In accordance with clause 3 of Schedule 6A of the Act, section 75W of the Act as in force immediately before its repeal on 1 October 2011 as a modified by Schedule 6A, continues to apply to transitional Part 3A projects.

The department is of the view that the application to modify the project application approval may be considered and approved as an application to modify a project approval under section 75W of the EP&A Act given that:

- the proposed modifications do not alter the purpose of the project; and the modified development will remain as the construction of warehouse distribution centres with ancillary industrial or manufacturing activities and with construction of associated infrastructure; and
- the proposed modifications would involve minimal environmental impact and the issues that arise from consideration of the modification request are generally consistent with the issues considered during the assessment of the original project application.

Given all the above, the Department considers the Minister, or his delegate/s, could reasonably form the view that the modification request is within the scope of section 75W of the EP&A Act and is capable of being approved as a modification under section 75W of the EP&A Act.

3.2 Environmental Assessment Requirements

Section 75W of the EP&A Act provides the Director-General with scope to issue environmental assessment requirements (DGRs) that must be addressed with respect to the proposed modification. The proposed modification does not significantly alter the approved project. As the modification relates to relatively minor rearrangements to layout, parking and staging of the proposal, it was considered unnecessary to notify the proponent of any further environmental assessment requirements.

3.3 Delegated Authority

The Minister has delegated his functions to determine Part 3A applications to the Department. Under the Instrument of Delegation, which took effect from 1 October 2011, the Minister for Planning and Infrastructure has delegated determination of a modification request under Section 75W to senior staff of the Department of Planning and Infrastructure where:

- the relevant local council has not made an objection; and
- a political disclosure statement has not been made; and
- there are less than 10 public submissions in the nature of objections.

There have been no submissions received from the public, although Penrith City Council has made a submission. Council raises issues to be considered in the Department's assessment of the modification rather than making a formal objection (refer Section 4.1). There has also been no political disclosure statement made for this application, nor for the original project application.

Accordingly the application is able to be determined under delegation by the Director Metropolitan and Regional Projects North.

3.4 Permissibility

The site is zoned IN1 – General Industrial under State Environmental Planning Policy (Western Sydney Employment Area) 2009. Industries (other than offensive or hazardous industries) and warehouse or distribution centres are permissible with consent within the IN1 zone.

The objectives of the IN1 zone include the following relevant objectives:

- to facilitate a wide range of employment-generating development including industrial, manufacturing, warehousing, storage and research uses and ancillary office space;
- to minimise any adverse effect of industry on other land uses; and
- to encourage a high standard of development that does not prejudice the sustainability of other enterprises or the environment.

The modified development will be consistent with the relevant zone objectives.

4. CONSULTATION AND SUBMISSIONS

4.1 Exhibition

While section 75W of the EP&A Act does not require a modification request to be publicly exhibited, the proposed modification was forwarded to Penrith City Council and the Roads and Maritime Services (RMS) and responses have been received from these agencies, refer below. A copy of the request for modification was also placed on the Department's website. No public submissions have been received.

One public submission was received following the exhibition of the original project application, from a neighbouring landowner concerned about potential stormwater impacts. The modified development would have no significant impacts in this regard as there would be no substantial change in impervious areas, and as this issue is appropriately dealt with by existing conditions of the project approval.

4.2 Submissions

Penrith City Council

Penrith City Council has raised the following matters:

Visual impacts

- council is concerned about the size of the building and the resulting visual impacts, particularly when viewed from Mamre Road,
- there is a need for appropriate articulation of the building form and consideration of the requirements for site development and urban design within Penrith DCP,
- the use of appropriate and varying building materials and colours is encouraged.

Landscaping

- landscaping should be designed to complement the development and reduce the visual impact of the building when viewed from Mamre Road,
- as noted in Penrith Development Control Plan 2006, "the visual impact of large expanses of wall should be reduced in scale by architectural treatment as well as by dense grove planting or other landscape design solutions".

Parking

- the proposed development fails to satisfy Council's minimum requirements with respect to car parking rates,
- the arguments that the previously approved car parking rate could be applied to the proposed development form may not be appropriate given that car parking demands vary based on land use types and unit sizes,
- an appropriate ratio of car parking numbers is to be provided for each unit within the development.

Roads & Maritime Services

The RMS has provided the following comments:

Road widening

 RMS has vested a strip of land for road widening along the Mamre Road frontage of the subject property and further proposed a Road Widening Order under section 25 of the *Roads Act 1993*. However, the RMS has no objections to the proposed development on property grounds provided any new buildings or structures are erected clear of the land reserved for road widening.

Parking

 No objection is raised to the proposed additional 78 car parking spaces required by the increased floor area of 10,202m². (*This was the additional number of parking spaces and increased floor area proposed prior to submission of amended plans on 30 January 2012*).

The matters raised by Penrith City Council and RMS in respect to visual impacts, landscaping and parking are considered below in section 5. The modified development will be clear of the proposed RMS road widening.

Amended plans, 30 January 2012

Amended plans submitted by the proponent on 30 January 2012 were referred to RMS and Council on 2 and 3 February 2012.

Council advised on 6 February 2012 that their previous advice remained relevant and Council had no further comments on the changes outlined in the amended plans. Council did not object to the amended plans.

The increased provision of parking spaces in the amended plans will now satisfy Council's minimum requirements with respect to car parking rates in respect to the increase in gross floor area. This matter is discussed in sections 5.1.3 and 5.5.2.

RMS has not provided any further advice on the amended plans at the time of preparation of the assessment report. The amended plans will not be inconsistent with the RMS advice. The modified development as amended will remain clear of the proposed RMS road widening. The amended plans provide for an additional 216m² or 2.12% GFA compared to the plans originally submitted with the modification

application reviewed by RMS. This additional GFA will be more than balanced by the additional 46 parking spaces, a 58.97% increase in parking spaces over the additional 78 spaces previously proposed.

5. ASSESSMENT

The Department considers the key issues for the proposed modification to be

5.1 Consistency with relevant EPIs, Policies and Guidelines

The modification has been assessed against the provisions of relevant EPIs, policies and guidelines and in particular:

5.1.1 State Environmental Planning Policy (SEPP) (Western Sydney Employment Area) 2009

This SEPP came into force in October 2009, since the project approval in December 2007. The modified development is permissible with consent within the IN1 General Industrial zone applying to the land under this SEPP. The modified development will be consistent with the aims of the SEPP and objectives of the IN 1 zone.

The modified development will not be inconsistent with the principal development standards in part 5 of the SEPP. In regard to clause 18 (6) of the SEPP the modified development has been considered against the controls for Erskine Business Park within Penrith Development Control Plan 2006, refer to discussion below and refer to section 5.5 of this report.

Under clause 31 of the SEPP the following design principles are to be taken into consideration, whether or not:

(a) the development is of a high quality design, and

- (b) a variety of materials and external finishes of the external façades are incorporated, and
- (c) high quality landscaping is provided, and
- (d) The scale and character of the development is compatible with other employment-generating development in the precinct concerned.

The bulk and scale and visual amenity impacts of the modified development, including materials and finishes, are considered below in section 5 of this report. The scale and character of the modified development is consistent with the approved development and consistent with neighbouring development within the industrial estate. Modified conditions of approval are recommended in respect to submission of final external finishes and landscaping details for the approval of the Director General, or delegate/s.

5.1.2 SEPP (Infrastructure) 2007

The additional floor space resulting from the modified development potentially triggers the provisions of this SEPP regarding traffic generating development. The modification request was therefore referred to RMS. The modified development was considered at the Sydney Regional Development Advisory Committee on 14 December 2011, and advice was received from RMS on 22 December 2012. The

issues raised regarding proposed road widening have been detailed in section 4.2. There were no objections to the modified development.

The Department is satisfied that the modification will substantially comply with the relevant SEPPs.

5.1.3 Penrith Development Control Plan 2006

The modified project will vary from development standards for Erskine Park within this DCP related to site coverage, setbacks and parking.

Site coverage

The site coverage across the whole development site has been identified as increasing from 50.8% to 53.9% which exceeds the maximum 50% specified in the DCP. However under the DCP where land is included within a Biodiversity Conservation Area that land can be included in the site coverage calculations. The development of the estate has included the dedication of 24.2ha of land as a part of a regional biodiversity corridor. When this biodiversity area is taken into consideration the overall site coverage is well under 50%.

Setbacks

The first floor office area on the North West corner of unit 1 will marginally protrude into the minimum 20m building setback to Mamre Road. This relates to small sections of the building, being approximately 1m to glazed areas and 1.9m to feature treatments. The variations to the DCP requirements can be justified having regard to their minor nature of the variations, the minimum setback being met for the majority of the building wall, the modulation and articulation that these protrusion provide to this part of the setback, and the landscaping treatment to be provided.

Parking

Parking provision for the modification and the additional gross floor area is discussed in **section 5.5.2**, including an assessment of the modification in relation to the provisions of Council's DCP.

5.2 Additional gross floor area

The modified development will result in a 10,418m² increase in the gross floor area; representing an increase of 12.5% over that originally approved on lots 1, 2 and 5 and approximately 50% increase on existing gross floor space approved over lot 5 alone (previously 20,770m²). There are no specific gross floor area or floor space ratio controls, and this floor space increase needs to be considered in relation to matters such as site coverage, bulk and scale, visual amenity and traffic and parking impacts. Site coverage has been considered across the whole estate and in relation to the controls in Penrith DCP, and is considered satisfactory having regard to the dedication of 24.2ha of land as a part of a regional biodiversity corridor. The other matters are considered below.

In regard to potential developer contributions for additional gross floor area, section 94 development contributions of \$5,384,422.00 were levied under Erskine Park Employment Area Development Contributions Plan (now Erskine Business Park Development Contributions Plan 2008), subject to condition 11 of the project approval to MP06_0253, for the establishment of the warehouse and distribution complex. The contribution rates were based upon developable hectares, and

therefore no additional contributions would be applicable to the additional floor space. Under the current contribution plan, if a contribution has already been paid under the plan, then no contribution is payable on that portion of the land already levied and paid.

5.3 Bulk and scale

The modified development will result in an increase in the bulk and scale of development on lot 1. The modified development provides for a large single warehouse with a building footprint of approximately 300m x 71m to 105.7m. The height of the building to the roof ridge will be approximately 13.7m, with building walls of approximately 10.5m. This compares to the approved project with two separate buildings on lot 5, with building footprints of approximately 127m x 73m and 130m x 65m to 91m, a 45m building separation and ridge heights of approximately 12.4m and 13.7m. The modified development provides for a 200mm increase in the finished floor levels from 39.5m to 39.7m. It is also noted that these levels may be up to 500mm higher due to potential earthworks variations across the site.

The bulk and scale of the modified development is consistent with neighbouring development. To the east of lot 5 there is a large warehouse distribution building on lot 1 (Linfox Logistics warehouse) with a building footprint of approximately 340m x 147m and with a ridge height of approximately 13.7m. To the south there are two large warehouse buildings on lot 4 (Kimberley Clark) the first of which has a footprint of approximately 215m x 104m and a ridge height of approximately 12.6m with a 60m separation from a second building with a footprint of approximately 180m x 131m and a ridge height over 19m.

The department is satisfied that the bulk and scale of the modified development will be consistent with the bulk and scale of existing large neighbouring warehouse and distribution facilities, and is not inconsistent with the expected bulk and scale of buildings within the Interlink estate.

5.4 Visual amenity

As indicated above, the modified development provides for a single large building. This will have a facade length of approximately 300m to the western elevation along the Mamre Road frontage of the site. This will be the most visible continuous elevation, when viewed from outside the estate. It is also noted that the building will stand on top of an approximately 2.5m high embankment to Mamre Road. The facade length of the modified development compares to the approved project where two separate buildings were proposed with facades lengths of approximately 127m and 130m, to Mamre Road, and with approximately 45m separating the two buildings.

The visual impacts of the single building have been addressed in the environmental assessment for the modification where it has been argued that:

- a single building will almost completely obscure the loading and servicing functions of the lots when viewed from Mamre Road.
- façade features will ensure the scale of the façade is broken down and varied to create interest.
- there will be a more attractive presentation to corner elevation at James Erskine Drive with the office component now located on the northern face of the building and the corner return.

 the landscape plan will ensure that the development results in an attractive presentation to Mamre Road enhancing the visual amenity of the area.



West (Mamre Road) Elevation - PROPOSED Modification

Figure 5: Comparison of approved and modified elevations to Mamre Road

In response to issues raised by Penrith City Council regarding the visual impacts of the modification and landscaping of the development, the proponent has advised that any issues can be overcome by use of increased architectural treatment and through successful landscaping, albeit that market demands for a large warehouse style buildings can limit the architectural treatment that can be undertaken.

The modification provides for an appropriate mix of external colours and finishes including a mixture of precast concrete dado panels and various colours for external metal sheeting.

A landscape design statement and landscape concept plan have also been provided. Modified landscaping will include advanced planting on the corner of Mamre Road and James Erskine Drive as well as a landscape buffer along the Mamre Road frontage. This will provide for up to five rows of mixed plantings of native species to the Mamre Road frontage. The proposed landscape treatment will be consistent with the requirements of Penrith DCP for dense grove and screen planting with a framework of canopy trees, shrubs and groundcovers.

The landscaping scheme for the site incorporates a grassed fire track in the setback to Mamre Road. This is approximately 5m wide along the western elevation. This is intended for emergency fire access. The proponent proposes to undertake all of the landscaping along the setback to Mamre Road as part of Stage 1 of the development (construction of unit 1 on the northern portion of the site). This will ensure that the site and the development are adequately screened following the completion of the Stage 1 works.

The existing conditions of approval include a requirement in condition 22 that prior to commencement of construction the proponent revises detailed plans for the facades for unit 5A and lot 1, in consultation with Council and to the satisfaction of the Director-General. The development on lot 1 has been completed. In regard to unit

5A the façade revisions were to deal with the articulation and external appearance of roller doors on the northern elevation adjacent to the corner of Mamre Road and James Erskine Drive. The modified development provides for changes to the development which will remove the roller doors from this elevation. The existing condition can be amended and an additional condition can be inserted to ensure that appropriate facades details and features are provided to the Mamre Road elevation for the modified development on Lot 5. Existing condition 24 deals with submission of final landscape details. An additional condition can be inserted to provide for submission of a landscape management plan for the modified development on Lot 5, as well as the completion of landscaping along the Mamre Road frontage as part of the proposed Stage 1.

On the basis of the above, the department is satisfied that:

- the building can be suitably articulated and external finishes can be varied in terms of materials and colours;
- the functional demands of a large distribution centre building limits the extent to which it could be further articulated or made interesting from a visual perspective; and
- the site, and in particular the Mamre Road frontage, can be appropriately screened and landscaped, in accordance with a detailed landscape plan.

5.5 Traffic and Parking

5.5.1 Traffic

A traffic impact assessment has been submitted with the modification request. The traffic impact assessment indicates that the proposed development is expected to generate peak hourly traffic volumes of 466 vehicles per hour. It is further indicated that whilst this would exceed volumes identified in previous strategic traffic modelling for the site, the overall traffic generation of the Interlink estate (including the proposed development) is consistent with previous strategic modelling undertaken by Council and the RTA

Vehicular access to the site is now proposed via nine driveway crossings to Sarah Andrews Close with separate light and heavy vehicle access to each of the three tenancies. This is instead of three driveway crossings in the project approval. The traffic impact assessment has reviewed these access driveways, with swept path diagrams provided to demonstrate that there will be satisfactory truck access for 19m articulated trucks.

As noted above the modification request has been considered by the Roads and Maritime Services and no traffic objections were raised. The Department is satisfied that the traffic generation increase associated with the modified development is not inconsistent with the expected traffic generation of the approved development and within the overall estate.

5.5.2 Parking

The modified project (as amended) provides for a total 291 spaces on lot 5 being an additional 124 parking spaces on this lot compared to the approved project. Only 61 of these additional spaces will be allocated and marked car parking areas. An

additional 63 provisional car parking spaces have been identified being spaces that can be fitted into the hard stand areas not impacted by truck access and manoeuvring.

Under Council's DCP at least 104 additional parking spaces would be required for the additional 10,416m² of gross floor area (GFA) on Lot 5, based upon the DCP parking rate of 1 space per 100m² for warehouses. The proposed 124 additional parking spaces will therefore comply with Council's minimum parking rate in relation to the total number of additional parking spaces required for the additional 10,416m² GFA. However the number of parking spaces to be provided for unit 2 will not comply with the minimum required under Council's DCP nor will the number of parking spaces for unit 3 comply, if the provisional parking is discounted from the total number of spaces for this unit. A breakdown and assessment of parking for each of the three units in relation to Council's DCP requirements is provided in Table 2.

Unit	GFA	Parking required under Council's DCP	Parking Spaces to be provided
Unit 1	13,478m ²	135 spaces	153 spaces135 allocated spaces18 provisional spaces*
Unit 2	12,100m ²	121 spaces	 80 spaces 47 allocated spaces 33 provisional spaces*
Unit 3	5,610m ²	56 spaces	 58 spaces 46 allocated spaces 12 provisional spaces*
Lot 5 (Units 1, 2 and 3)	31,188m ²	312 spaces	 291spaces 228 allocated spaces 63 provisional spaces*

 Table 2: Parking and parking rates for the modified project

*provisional parking spaces = potential but unmarked parking spaces identified on plan, outside allocated parking areas, but within the hardstand areas that are not impacted by truck access and manoeuvring.

NSW Government Department of Planning & Infrastructure

The approved project provided for an overall parking provision on Lots 1, 2 and 5 of 1 space per $155m^2$, while the parking rates applicable to the approved units on lot 5 are 1 space per $127.9m^2$ and 1 space per $124m^2$. Taking into account both the allocated and provisional parking spaces now proposed for each of the three units in the modified project, the number of parking spaces for units 1, 2 and 3 on Lot 5 will be greater than this approved rate, being 1 space per $88m^2$, 1 space per $151m^2$ and 1 space per $96.7m^2$ respectively. While these rates are less than the Council parking rate of 1 space per $100m^2$ they are well in excess of the RMS guidelines for warehouse development of 1 space per $300m^2$.

The lack of compliance with the Council's DCP parking rates within the estate was considered in the assessment report for the project application. It was noted that the parking provision on all lots exceeded the RMS guidelines for warehouse development but was less than required under the DCP for Lots 1, 5A and 5B. It was indicated that the RTA and Council raised no concerns and that future employees of the proposed facilities would work in shifts such that all staff would not be on site at one time. Parking requirements were estimated under a worst case scenario and it was considered that parking provision would be sufficient for the proposed warehouse distribution facilities. Bicycle parking was also recommended on all lots to encourage use of alternative transport. A parking review was required under condition 21 of approval, prior to development of stage 2 on lot 1, due to the 217 parking spaces on lot 1 being significantly less than the 497 spaces required under the DCP.

As the Proponent proposes to stage the development of Lot 5 there is potential to review the parking requirements before Stage 2 of the development on Lot 5 proceeds when there may be more certainty about prospective uses and tenants of Stage 2. The Proponent has identified that changes could include reducing the gross floor area and /or constructing extra levels of parking. An additional condition can be included in the project approval similar to condition 21 which required a parking review for Lot 1. This can require a parking review before Stage 2 of the modified development proceeds on lot 5. This would provide for a review of the parking requirements for proposed units 2 and 3, and therefore an opportunity for additional parking spaces to be provided if recommended or required by the parking review.

On the basis of the above, the department is satisfied an appropriate ratio of car parking can be provided for each unit. Parking provision for the modified development will be generally consistent with the parking provision within the approved development and will likely be sufficient for the proposed warehouse distribution facilities, with potential for parking requirements for units 2 and 3 to be reviewed and additional spaces provided if required.

6. CONCLUSION AND RECOMMENDATIONS

The department has assessed the proposed modification in accordance with the requirements of clause 8B of the Regulations.

While the modification will result in changes to the layout and design of the approved facility the assessment has found that the modification is unlikely to have any significant environmental impacts.

The department is of the view that the application to modify the project application approval may be considered and approved as an application to modify a project approval under section 75W of the EP&A Act given that:

- the proposed modifications do not alter the purpose of the project; and the modified development will remain as the construction of warehouse distribution centres with ancillary industrial or manufacturing activities and with construction of associated infrastructure.
- the proposed modifications would involve minimal environmental impact and the issues that arise from consideration of the modification request are generally consistent with the issues considered during the assessment of the original project application.

The key issues that have considered by the department in the assessment of the modification are:

- compliance with relevant EPIs, policies and guidelines.
- increase in gross floor area.
- bulk and scale of the modified development.
- visual amenity/impacts, and
- traffic and parking.

The department is satisfied that these key issues have been resolved or that any outstanding matters can be appropriately dealt with by means of inserting additional conditions of approval 21A, 22A and 24A, relating to submission of a parking review prior to stage 2 of the development on Lot 5, submission of details of external finishes and a final landscape plan.

Endorsed by:

Ray Lawlor Planner, Metropolitan and Regional Projects North

Stuart Withington A/Team Leader, Metropolitan and Regional Projects North

Heather Warton Director, Metropolitan and Regional Projects North