

Our reference: ECM: 9598535
Contact: Kathryn Saunders
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9 June 2021

Department of Planning, Industry and Environment
Attn: Bruce Zhang
Email: bruce.zhang@planning.nsw.gov.au

Dear Mr Zhang,

Response to Request for Advice on SEAR's Request: Oakdale West Estate, Warehouse 4E at 2 Aldington Road Kemps Creek

I refer to the Department's request to provide comments on a request for SEARs. Thank you for the opportunity to review and contribute.

The following comments are provided for the Department's consideration in relation to this matter.

1. Planning Considerations

The proposal seeks SEARs for the construction, operation and fit-out of Warehouse 4E and its associated hardstand and car parking areas, landscaping and solar panel installation. Use of the warehouse and ancillary office as a warehouse and distribution facility is also sought. Use is noted as including the storage and distribution of liquor, classified as a Dangerous Good.

Warehouse 4E is located within Precinct 4 of the Oakdale West Estate (OWE) development as the first stage of development within Precinct 4. Precinct 4 comprises an area of 7.48ha and includes seven, small to large scaled warehouses.



Figure 3: OWE and Building 4E subject to the proposed development (Source: Goodman)

Figure 1 (previous page): Excerpt from Request of SEARs Stage 4, Building 4E, prepared by Keylan, dated May 2021.

The Keylan Request for SEARs Stage 4, Building 4E document notes that a modification application (MOD 7) is being prepared in relation to approved SSD 7348. Any development application for Warehouse 4E is to be consistent with MOD 7 and is not to be lodged prior to the approval of MOD 7.

(a) Height

Your attention is drawn to the applicant's previously utilised interpretation of Height (being from the constructed pad level rather than from Natural Ground Level) and it is requested that the Department clarify with the proponent as to the maximum height achievable and how it is to be measured, noting the levels approved as part of the SSD consent.

(b) State Environmental Planning Policy (Western Sydney Employment Area) 2007 [WSEA SEPP]

The package of documentation accompanying the DA is to address all applicable plans and policies including although not limited to State Environmental Planning Policy (Western Sydney Employment Area) 2007 [WSEA SEPP].

The WSEA SEPP includes provisions related to ecologically sustainable development, rainwater harvesting and water quality. The applicant is to demonstrate how the development contains measures designed to minimise the consumption of potable water and greenhouse gas emissions and is to provide detail in relation to the water sensitive design principles that are incorporated into the design of the development.

An Ecologically Sustainable Development (ESD) report is to accompany the application. The report shall be prepared by a suitably qualified and experienced professional.

(c) Design, layout and landscaping

In relation to the design and layout of the warehouse development, landscaping setbacks are to be maximised and owing to the limited frontage of the site to the Estate Road, are not to be encroached upon.

It is noted that car parking provision generously exceeds the minimum requirements of the applicable rates and thus it is strongly recommended that internal landscaped blisters within the car parking areas are increased in width and area so that long term sustainable and significant canopy tree planting can be accommodated and will thrive.

Landscaped blisters within car parking areas shall be included at a rate of one every 6 car parking spaces and are to be a minimum of 2m in width. Soil volumes are to be maximised and WSUD features are to be integrated into the car parking and landscape design (refer images below).



Image credits: Jimmy Hughes and Yoly Estomata



A central landscaped aisle is suggested, and as a minimum, car parking aisles are to be bookended and interspersed with larger and more significant landscaped blisters or islands to ensure sustainability of shade producing canopy trees.

Council's DCP requires that car park hardstands are to provide one canopy tree for each 6 car parking spaces. This ensures a 12m canopy spread is achievable and will assist in shade and habitat provision, increased amenity and reduced heat island impacts, noting the proximity of the site to the Western Sydney Airport.

All retaining wall locations and top of wall heights are to be nominated on the set of architectural and landscape plans.

(d) Services and amenity areas

Pad mounted substations and all other services such as hydrant boosters are to be nominated on plans and landscaping is to be increased rather than deducted from to accommodate the service infrastructure.

An outdoor staff lunch or break area is to be provided and is not to be nominated as 'smokers shelter'. The outdoor staff area should be high in amenity and not co-located with the pump room and sprinkler tank – or is to be screened.

Services such as the pump room and sprinkler tank should be screened from the street or located away from the primary entry and street front. The area hatched as green surrounding the sprinkler tank and pump room is unlikely to be landscaped owing to the hardstands required. Plans should be realistic as to the extent of landscaping provided.

Should driver accommodation be required, it is to form part of the application at lodgement so as to ensure that the area nominated for driver sleeping quarters is safe and high in amenity.

It is recommended that separate truck driver amenities are to be provided in close proximity to the truck parking.

2. Engineering Considerations

(a) Stormwater

Stormwater drainage for the site is to be discharged into the existing drainage system within the Oakdale West Industrial Estate. A Stormwater Management Plan (SMP) and concept stormwater plan is to be submitted with the application.

The SMP shall demonstrate how the development complies with the overarching stormwater management strategy approved under the parent subdivision.

A water sensitive urban design strategy prepared by a suitably qualified person is to be provided for the site. The strategy shall address water conservation, water quality, water quantity, and operation and maintenance.

(b) Traffic

The parent subdivision had originally proposed a standard 'T' intersection at Sepia Avenue (Road No. 6) and Cuprum Close (Road No 7), with Cuprum Close proposed to extend along the same alignment into the subject lot. The current proposal seeks to remove the 'T' intersection and replace with a 90 degree bend.

It is noted that a separate modification will be sought to SSD-7348 to modify the internal road layout. Any Traffic Report shall address the proposed change to the road layout as approved under the parent subdivision and is to include concurrent turn paths for the 90 degree bend.

A Road Safety Audit shall be undertaken on the concept design of the driveway locations.

3. Traffic and Parking Considerations

(a) Traffic Impact Assessment

The development shall be supported by a Traffic Impact Assessment of the proposed development, road and footway network, heavy vehicle and light vehicle access, complying number of heavy vehicle parking, loading and manoeuvring areas and complying numbers of light vehicle staff and visitor parking spaces including compliance with Australian Standards, Austroads Guidelines, TfNSW (RMS) Technical Directions / Guidelines and Council's Development Control Plan (DCP) including Section C10.

The Traffic Impact Assessment shall include the proposed development driveway accesses for heavy vehicles and visitor / staff car parks, sight distance compliances at intersections and driveways, arrangements for waste collection vehicles, emergency / fire service vehicles and other service vehicles, accessible parking and at least 1.5 metre wide accessible pedestrian access from the road frontage and the car park to the buildings, car parking and bicycle provision numbers and bicycle facilities, electric vehicle charging station provisions and manoeuvring swept turn paths. This should include compliances with Austroads Guidelines, TfNSW (RMS) Technical Directions / Guidelines, AS 2890 including parts 1, 2 & 6,

AS 1158, NSW Government Walking and Cycling Guidelines and Council's Development Control Plan 2010.

The Traffic Impact Assessment and documentation shall include dimensioned plans of the proposed accessible paths of travel, driveways, access aisles, loading and vehicle swept path manoeuvring areas and parking spaces and sight distance requirements at intersections and driveways including compliance with Austroads Guidelines, TfNSW (RMS) Technical Directions / Guidelines, AS 2890 including parts 1, 2 & 6, AS 1158, NSW Government Walking and Cycling Guidelines and Council's Development Control Plan.

- (b) Heavy vehicle access from the public road shall be physically separated from vehicle access to the car parking areas for safety reasons.
- (c) A minimum of four Electric Vehicle Charging Stations (EVCS) are to be provided within the car parking areas. The charging stations are to be designed to accommodate the requirement of commercially available public vehicles and their required connector types (currently known as Type 1 and Type 2 connectors).

A minimum of four additional car parking spaces are to be designed to as to be readily retrofitted as EVCS parking spaces.

The installed EVCS car parking spaces are to be signposted and marked as for the use of electric vehicles only and are to be located as close as possible to the building accesses after accessible parking space priority. EVCS are to be free of charge to staff and visitors.

- (d) Complying numbers of secure, all weather bicycle parking, end of journey facilities, change rooms, showers, lockers are to be provided at convenient locations in accordance with Council's Development Control Plan (DCP), Chapter C10, Section 10.7, AS 2890.3 Bicycle Parking Facilities and Planning Guidelines for Walking and Cycling (NSW Government 2004).
- (e) Accessible pedestrian paths of travel at least 1.5 metres wide are to be provided from the car park to all offices and staff facilities of the building.
- (f) Accessible parking is to be provided with accessible paths of travel to the facility in accordance with AS 2890.6.
- (g) Appropriate signage, visible from the public road and on-site shall to be installed to reinforce designated vehicle circulation and to direct staff / delivery vehicle drivers / service vehicle drivers / visitors to on-site parking, delivery and service areas.
- (h) The required sight lines around the driveway entrances and exits are not to be compromised by street trees, landscaping or fencing. Sight distance requirements at driveways are to be in accordance with AS 2890.2, Figure 3.3 and Figure 3.4.

4. Waterways Considerations

A Stormwater Management Strategy for the proposal will need to be prepared by a suitably qualified professional in support of the development.



The Water and Soil Management Strategy needs to demonstrate and outline how both surface and groundwater resources will be safeguarded for the duration of the development. The stormwater treatment measures are to be provided in accordance with the approved overarching stormwater strategy, which included precinct bioretention systems. Council notes that the stormwater treatment basins are to remain in the ownership of the developer and maintenance will be their responsibility in perpetuity.

Council also notes that gross pollutant traps are required to be provided on site and these were nominated as CDS style in the approved strategy. Water conservation measures are also required to be provided on site with a target of meeting a minimum of 80% non-potable demand with the use of harvested rainwater.

5. Environmental Management Considerations

(a) Noise Impacts

An acoustic assessment is required to be submitted as a part of any application to demonstrate that the proposed development will not have any impact on nearby sensitive receivers. This report is to be prepared by an appropriately qualified acoustic consultant, and is to consider noise impacts including, but not limited to:

- Construction
- Operation
- Mechanical plant
- Vehicular movements
- Road traffic noise

Should mitigation measures be necessary, recommendations should be included to this effect. Recommendations and mitigation measures must be shown on all architectural plans.

(b) Contamination (SEPP 55)

The application is to address all relevant requirements under State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55). Consent cannot be granted to any development unless these requirements have been satisfied. The application is to demonstrate that the land is suitable for the proposed purpose either by the submission of a statement as part of any Environmental Impact Statement, Phase 1 Preliminary Site Investigation or Phase 2 Detailed Site Investigation. Any reports need to be completed by a suitably qualified person(s) or company.

(c) Hazardous and Offensive Development (SEPP 33)

Any application is to consider SEPP 33 and provide an assessment of the proposed development with regard to the SEPP.

(d) Waste Management

A Waste Management Plan is to be provided addressing waste produced during the construction phase of the development. It should address waste quantities, storage locations and removal.



(e) General Environmental Health Impacts

The environmental impacts associated with the construction phase of the development will need to be addressed, such as water quality, noise, dust/air quality and erosion and sediment control. This can be included in the EIS and plans.

(f) Sewerage Infrastructure

Provide confirmation that the proposed development will be connected to Sydney Water's reticulated sewer.

6. Biodiversity Considerations

The application shall detail compliance with the Biodiversity Conservation Act 2016 and any approvals in place in relation to offsets or biodiversity assessment and management.

Should you require any further information regarding the comments, please contact Kathryn Saunders, Senior Development Assessment Planner on (02) 4732 8567.

Yours Sincerely,

Gavin Cherry
Development Assessment Coordinator