



**TOWER 2, LEVEL 23  
DARLING PARK, 201 SUSSEX ST  
SYDNEY NSW 2000**

URBIS.COM.AU  
Urbis Pty Ltd  
ABN 50 105 256 228

12 October 2018

Ms Deana Burn  
Assessment Planner  
NSW Department of Planning  
320 Pitt Street  
Sydney NSW 2000

Dear Deana,

## **OAKDALE WEST ESTATE SSDA 15\_7348 - REPOSE TO MATTERS RAISED BY THE DEPARTMENT OF PLANNING**

A Response to Submission (RtS) package was previously prepared and lodged on the 8 May 2018 which addressed a number of issues raised by Government authorities and the community during public notification of SSDA 15\_7348 for Oakdale West Estate.

Whilst a number of issues were addressed through the previous report, it is noted that four items raised post the lodgement of that RtS now form the basis of this RtS. Accordingly, further correspondence with the relevant agencies was undertaken to confirm and resolve the outstanding matters as outlined below in **Table 1**.

Goodman has worked proactively with the relevant authorities to resolve these outstanding matters as detailed within **Table 1**. The items that remain outstanding are resolved to the point that only DP&E can fully resolve. Specifically, determining the end owner of the WNSLR and resolving OSL's last outstanding issue.

This cover letter is to be read in conjunction with the following consultant reports:

- Appendix A – Architectural Plans;
- Appendix B – Civil Package;
- Appendix C – Traffic Impact Assessment;
- Appendix D – Landscape Plans;
- Appendix E – Noise Impact Assessment;
- Appendix F – Visual Impact Statement;
- Appendix G – Biodiversity Assessment Report, and
- Appendix H - Biodiversity Offset Strategy.

## OUTSTANDING MATTERS FOR CONSIDERATION

The matters outlined below in **Table 1** were either raised by authorities following the May 2018 RTS, or otherwise require resolution prior to determination. The table below summarises how these issues have been addressed in this subsequent RtS package.

Table 1 – Outstanding matters for consideration

Authority	Issue	Action	Status/Outcome
Transport for NSW	<ul style="list-style-type: none"> <li>Confirmation on freight corridor width</li> </ul>	<ul style="list-style-type: none"> <li>No further action required.</li> </ul>	<ul style="list-style-type: none"> <li>TfNSW has confirmed (by way of letter) that a corridor width of 60m is to be provided.</li> <li>This has been endorsed by DP&amp;E in their email to Goodman dated 6 August 2018.</li> <li>OWE Concept Plan has been amended to reflect this corridor location and width.</li> </ul>
RMS	<ul style="list-style-type: none"> <li>Resolution of the intersection design along WNSLR (all three intersections)</li> </ul>	<ul style="list-style-type: none"> <li>RMS to confirm proposed intersection design at Lenore Drive and WNSLR in accordance with Goodman's RTS package is acceptable.</li> <li>RMS / PCC to confirm acceptance of the proposed roundabouts (instead of signalised intersections) at</li> </ul>	<ul style="list-style-type: none"> <li>RMS provided a range of comments to Goodman in relation to the proposed intersection at Lenore Drive and WNSLR. Goodman has responded to these queries within the RTS package (Refer addendum letter to Ason Report at Appendix C).</li> <li>Remains outstanding.</li> </ul>

Authority	Issue	Action	Status/Outcome
		Lockwood Road and Estate Road 1 intersection along WNSLR. It is noted that RMS specifically requested for these to change from signalised intersections.	
RMS	<ul style="list-style-type: none"> <li>Asset ownership (WNSLR)</li> </ul>	<ul style="list-style-type: none"> <li>DP&amp;E to resolve if RMS or PCC will be the Road Works Authority prior to determination.</li> </ul>	<ul style="list-style-type: none"> <li>Remains outstanding</li> <li>GMG will continue to assume the WNSLR will be owned by PCC in line with DP&amp;E's email dated 4 September 2018.</li> </ul>
Office of Strategic Lands (OSL)	<ul style="list-style-type: none"> <li>No net land loss for the biodiversity corridor.</li> <li>Ensuring the corridor provides continuity to fauna.</li> </ul>	<ul style="list-style-type: none"> <li>DP&amp;E to resolve OSL's issue noting there is no legal basis for Goodman compensating OSL for land lost within the Biodiversity Corridor.</li> <li>No further action required in relation to the continuity of fauna.</li> </ul>	<ul style="list-style-type: none"> <li>Remains outstanding.</li> <li>Godman has agreed to include a fauna culvert under the WNSLR. This has been included within the updated civil documentation package.</li> </ul>

## DEVELOPMENT FOR WHICH CONSENT IS SOUGHT

As a matter of clarification, the proposal seeks consent for:

- A Concept Proposal for the warehouse and distribution estate comprising of 22 building envelopes, including a development master plan and development controls;
- Landscape concept plan and biodiversity offsets;
- Civil concept plan including estate bulk earthworks, retaining walls and noise walls, and proposed cut to fill arrangement;
- Stage 1 Development Application, including:
  - Western North South Link Road (WNSLR) including roundabouts and signalised intersection, bridge over the Water NSW Warragamba pipelines, and the associated subdivision;
  - Bulk earthworks across the whole site including retaining wall and noise wall construction;
  - Road and Stormwater infrastructure associated with Road No.1, Road No.2, Road No.6 and part Road No.7;
  - Landscaping and public domain works (including to 40m landscape setback to the west), and bio-retention and detention basins across the estate;
  - Staged trunk infrastructure for the site;
  - Staged subdivision;
  - Development comprising the construction and operation of three warehouse and distribution facilities in Precinct 1;
  - Lead in services.

## PROPOSED AMENDMENTS TO SCHEME ORIGINALLY LODGED

Amendments are proposed to the original scheme as a result of addressing issues raised in the notification period. The accompanying specialist consultant assessment reports have also been updated to reflect the proposed amendments.

A summary of the key changes is as follows:

- 20m southern boundary setback introduced with pedestrian path provided for site access;
- Removal of southern drainage area and detention basin;
- Shortening of Estate Road 07;
- Modification of south-east drainage area (within transmission easement);

- Provision for 60m wide freight corridor along northern extent of the Estate;
- Minor modification of drainage area at the north-west of the site (within the freight corridor);
- Shortening of Estate Road 01 to accommodate additional buffer zone;
- Carparking related to site 2A to be relocated underground due to corridor setback constraints at this site;
- Shortening of Estate Road 02;
- Modification of parking area associated with site 1A;
- Proposed new amenities lot to be created in space between Estate Road 01 and the Proposed WNSLR;
- Modification to north-east drainage area (within transmission easement);
- General site re-grading and civil works to address site levels across the Estate;
- Replacement of signals with roundabouts at both Lockwood and Road 01;
- Retaining wall provided along eastern side of roadway;
- Minor modifications to drainage basin 1;
- Minor modification to drainage basin 5, as well as a change from the embankment to the west of the basement to a fill area rather than an embankment;
- Identified drip-line of trees on the north-west corner of the site which has resulted in the wall being relocated 6m away from the trees;
- Road 7 has been shifted north to align with endeavour zone substation;
- Northwest pads for Lot 2B and 2E have been raised by 4.25m and 3.52m respectively;
- Reconfiguration of the Lenore Drive intersection to allow for Diamond phasing.

The amendments have resulted in the site area modifications as outlined below in **Table 2**.

Overall the proposed modifications have resulted in a decrease in the overall building GFA of 2,656sqm, however the resulting development represents an overall net improvement through the inclusion of the amenities lot and future development areas.

Specific changes proposed to the Civil Design, Architectural Design and Landscape design, per precinct, have been further detailed within this letter.

Table 2 – Land Area Variations

Area	Original	Proposed	Variation
Total Site Area	154.12 ha	154.12 ha	Nil
Non-Developable Land	25.20 ha	20.77 ha	-4.43 ha
Easements	22.43 ha	22.45 ha	+0.02 ha
Regional Roads	6.43 ha	6.59 ha	+0.16 ha
Service Lot	1.50 ha	1.26 ha	+0.24 ha
Estate Roads	8.92 ha	8.62 ha	-0.3 ha
E2 Zone Non-Developable	0.0 ha	1.43 ha	+1.43 ha
<b>DEVELOPMENT AREAS</b>			
Precinct 1	22.41 ha	21.40 ha	-1.01 ha
Precinct 2	21.57 ha	19.51 ha	-2.06 ha
Precinct 3	18.49 ha	18.50 ha	+0.01 ha
Precinct 4	21.04 ha	22.39 ha	+1.350 ha
Precinct 5	6.02 ha	6.02 ha	Nil
Proposed Future Development	Nil	4.85 ha	+4.85 ha
Amenities Lot	0.0 ha	0.323 ha	+0.323 ha
Total Developable	89.53 ha	93.00 ha	+3.47 ha
Total Warehouse	453,369 sqm	452,493 sqm	-876 sqm
Total Office	23,555 sqm	22,776 sqm	-779 sqm
Total Facility	476,924 sqm	475,269 sqm	-1,655 sqm

## DETAIL OF PROPOSED MODIFICATIONS PER DISCIPLINE

The components outlined in the below section detail changes to the proposal from the 8 May 2018 RtS package, by discipline, mainly to accommodate the required 60m freight corridor.

### CIVIL DESIGN

#### WNSLR

The following updates have been made to the WNSLR documentation:

1. Double diamond phasing of EPLR and WNSLR intersection:
  - a. 2026 intersection design to be adopted
  - b. Boundary provisioning for 2036 intersection design
2. Fill batter slope on north-west corner of WNSLR bridge changed to 1 in 4;
3. Northern WNSLR Basin and associated easement deleted, and stormwater diverted to existing northern Fitzpatrick Basin;
4. Southern WNSLR Basin consolidated with Basin 1 into one bio-retention Basin. Footprint amended. Ownership is intended to be transferred to Penrith City Council;
5. Lockwood Road and WNSLR intersection changed from signalised to roundabout intersection;
6. Estate Road 01 and WNSLR intersection changed from signalised to roundabout intersection;
7. Stormwater adjusted to support basin and roundabout changes;
8. NOR received from Sydney Water for Section 8-7 and Lenore Drive Potable Water Lead-in. Potable Water design updated to reflect lead-in requirements;
9. Changes to Fitzpatrick's proposed Lindsay Transport carpark and proposed retaining wall construction on eastern side of WNSLR;
10. Vehicular access and carparking for existing Viridian site redesigned to suit WNSLR;
11. WaterNSW Temporary Batter extents included to facilitate Bridge construction;
12. Bridge typical cross sections revised to suit the current Bridge Design;
13. Land Acquisition plan updated to reflect new extents;
14. Safety barriers included within design;
15. Fauna culvert included within design;
16. General vertical alignment changed to suit above changes.

#### Oakdale West Estate

##### Precinct 1

1. Relocation of Estate Road 01 and update of Precinct 1 lot layout to accommodate 60m wide TfNSW corridor;
2. Southern WNSLR Basin consolidated with Basin 1 into one bio-retention Basin. Footprint amended. Ownership intended to be transferred to Penrith City Council;
3. Basin 1 discharge outlet relocated;
4. Basin 2 deleted and consolidated into Basin 1;
5. Amenities Lot included in lieu of deleted Basin 2.

##### Precinct 2

1. Update of Precinct 2 lot layout to accommodate 60m wide TfNSW corridor;
2. Lot 2A, 2B and 2E levels raised;

3. Lot 2B layout updated to accommodate Biodiversity Offset area;
4. Basin 3a discharge outlet amended;
5. Basin 3b footprint slightly adjusted;
6. Lot 2E eastern retaining wall extent reduced;
7. Maintenance track on Western boundary adjusted.

#### **Precinct 4**

1. Road 7 alignment amended;
2. Lots 4A, 4B, 4C, 4D, 4E, 4F, 4G and Services Lot have been amended to suit revised Road 7 alignment;
3. Basin 4 has been removed and consolidated in Basin 6;
4. Southern boundary bushfire setback included;
5. Lot 4A retaining wall amended to reflect Basin 4 removal, bushfire setback and adjusted to be 10m from the Southern boundary;
6. Lot 4A retaining wall amended to reflect Basin 4 removal, bushfire setback, adjusted to be 5m from the Southern boundary and lengthened east to reduce batter extent within Trangrid easement;
7. Basin 5 footprint amended, and discharge outlet relocated.
8. Noise wall along the southern boundary updated.

#### **Precinct 5**

1. Basin 6 discharge outlet relocated.

#### **General Amendments**

1. Stormwater adjusted to support estate wide Road and Basin changes;
2. Revised sewer alignment;
3. In consultation with NRAR, a Water Management Plan will be addressed as a prior to CC condition;
4. Future sewer connection point from the adjacent school can be made via private pump system into the proposed sewer system;
5. Basin discharge points into Ropes Creek have been relocated to discharge within the OWE boundary;
6. Existing gas main relocation extents reduced;
7. AT&L Civil Design Report and Civil, Infrastructure and Stormwater Report updated.

## **ARCHITECTURE**

#### **Overall Masterplan**

1. Site area schedule revised;
2. Addition of a roundabout at the intersection of the Western North South Link Road & Estate Road 01;
3. Addition of a roundabout at the intersection of the Western North South Link Road & Lockwood Road;
4. Extent of future development zone increased to 60 metres along the northern boundary to allow for future freight line;
5. Basins within the transmission easement grid revised;
6. Estate Road 01 & 04 moved southward slightly;



7. Fire protection on southern boundary revised;
8. New Amenities Lot located on the northern intersection of the Western North South Link Road & Estate Road 01;
9. Signage location revised, and additional signage added;
10. Bushfire defendable space on the southern estate boundary of Site 4A & 4E revised.

#### **Precinct 1**

1. Site 1A & 1C site areas reduced;
2. Site 1A carpark reconfigured;
3. Site 1A office moved south slightly;
4. Site 1A warehouse area reduced;
5. Site 1C warehouse area reduced;
6. Include electrical sub-stations kiosk for each site;
7. Warehouse and Office elevations redesigned;
8. Office plans redesigned to match elevations;
9. Upgraded building façade design;
10. Amenity lot included.

#### **Precinct 2**

1. Site 2B western boundary revised;
2. Finished floor levels for site 2A, 2B and 2E revised;
3. Site and warehouse areas reduced on Site 2A & 2B;
4. Site 2A on grade car parking revised to basement car parking.

#### **Precinct 3**

1. No Amendments.

#### **Precinct 4**

1. Estate Road 07 revised with Road 7A added to access Site 4D & 4G;
2. Site 4A to 4G redesigned;
3. Carpark to the west of the Services Lot removed due to the redesign of Road 07.

#### **Precinct 5**

1. Basin on the eastern boundary revised.

## **LANDSCAPE**

#### **Overall Masterplan**

1. Revised arrangement and extent of northern batter to NSW Water easement;
2. Streetscape planting updated to revised Estate Road 01 arrangement;
3. Landscape basin treatments revised to suit updated civil design;
4. Native planting added to WNSLR median and new roundabouts, trees proposed to eastern side of road;
5. Western boundary sections amended to reflect updated civil RL's and maintenance access/easements;

6. Southern boundary sections updated to reflect removed basin and noise wall;
7. Precinct 1 landscape amended to reflect updated buildings and Road 01 location.

## BIODIVERSITY

### Changes to BAR

Native Vegetation / Plant Community Types (PCTs) that require offsetting under the NSW Biodiversity Offset Scheme have been amended due to:

1. Amendments to the masterplan (i.e. proposed TfNSW Western Sydney Freight Line; relocation of bioretention basins; road alignment change from intersection to roundabout; and final design alignment of stormwater infrastructure);
2. Inclusion of a 6m buffer zone around the final development footprint which more accurately allows for assessment of construction impacts on native vegetation;
3. Allowance for a 1.5m buffer zone where the installation of new boundary fencing required *may* impact on native vegetation. It should be noted that potential impacts on native vegetation as a result of fence construction is considered to have a low likelihood of occurring, a conservative approach has been adopted; and
4. Civil drainage design of stormwater outlet structures and alignment of bioretention basins located within the electricity easement (eastern side of Oakdale West) have been amended to avoid crossing through the neighbouring Oakdale South's biodiversity offset area. This has resulted in an increase to the extent of native vegetation that would be cleared at these locations.

Recent surveys have more accurately identified the extent of the proposed lot boundaries, retention walls and ancillary infrastructure, which has provided an opportunity to clearly identify and optimise where possible the extent of native vegetation that would be retained and available for onsite biodiversity offsetting.

Overall the area to be cleared has been reduced from 4.91 to 4.41 ha and ecosystem credits that must be retired to offset vegetation cleared reduced from 196 to 173.

### Changes to BOS

The proposed Biodiversity Offsetting Areas have decreased marginally due to amendments to the masterplan (as above) from 17.72 ha to 17.36 ha. This includes both decreases in some areas and increases in others.

The increased areas available for offsetting are of higher value. Consequently, there is little change to the quantity of ecosystem credits generated, i.e. an increase from 186 to 188.

The proposed Biodiversity Offsetting Areas have generated sufficient ecosystem credits to offset two of four PCTs on site (Grey Box - Forest Red Gum grassy woodland on flats of the Cumberland Plain and Grey Box - Forest Red Gum grassy woodland on shale of the southern Cumberland Plain), but not sufficient to wholly offset Forest Red Gum - Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain (deficit of 12 credits) and Swamp Oak Floodplain swamp forest (deficit of 5 credits)

The deficit in credits will be fulfilled through the purchase of these credits from the biobanking market.

## TRAFFIC ASSESSMENT

An updated traffic impact assessment (TIA) has been prepared by ASON Group which accounts for the changed intersection configurations and amended yield figures. The updated report is based on the following changes:

1. The intersection of WNSLR with Lockwood and Estate Road 01 being changed from signalised intersections to roundabouts. This is in response to discussions with Roads and Maritime Services (RMS) having regard for further consideration of relevant signal "warrants".
2. Alternations to the site layout resulting in the reduction in total Gross Floor Area (GFA) of the OWE from 476,573m<sup>2</sup> to 475,269m<sup>2</sup>, and
3. Alternations to the site layout resulting in the reduction in total GFA for Stage 1 from 118,025m<sup>2</sup> to 116,359m<sup>2</sup>.

The revised TIA provides an assessment of the existing and future operation of the road network servicing OWE, the broader WSEA and other transport related issues including car parking requirements, vehicle access and public transport accessibility. The TIA utilises the most recent assessments of key infrastructure projects within the broader WSEA in providing an appropriate assessment of the relative impacts of the SSD.

### Operational Traffic Assessment

The OWE is expected to generate in the order of 775 vehicles per hour during peak periods, with the Oakdale West and Fitzpatrick sites generating a cumulative 1,368 vehicles per hour (approx.) upon full development.

Planned road infrastructure in the vicinity of the site including the Southern Link Road (SLR) and Western North South Link Road (WNSLR) will accommodate these future traffic volumes (including full development of both the Fitzpatrick and OWE sites), including background growth, up to 2026.

For the longer term 2036 scenario, the analysis indicates that the intersection of WNSLR with Lenore Drive may exceed capacity. In response, allowances have been made in the design of this intersection to permit provision of an upgraded layout, should there be a need to improve intersection capacity by 2036. It is however emphasised that this 2036 modelling adopts conservatively high traffic volumes for full development of the subject site and therefore these upgrades may not be required. Accordingly, the future intersection arrangement should be subject to ongoing review as part of the staged delivery of development within the Broader WSEA.

All other intersections within the study area will operate with acceptable delays and Level of Service under both the 2026 and 2036 development scenarios.

Having regard for the above, the proposed WNSLR and internal road network is supportable on traffic planning grounds.

### Car Parking Assessment

Car parking provision at 1 space per 300m<sup>2</sup> Warehouse GFA and 1 space per 40m<sup>2</sup> office GFA (as proposed) will require a total of 528 parking spaces for the buildings proposed within Precinct 1.

A total of 592 spaces are proposed which readily satisfies this minimum requirement (based on

RMS Guide rates) and forms a suitable balance between the minimum requirement and Council's nominal requirement (1,164 spaces).

The internal configuration of the car park and loading areas generally comply with the relevant requirements of both AS 2890.1 and AS 2890.2. It is expected that a condition of consent can be imposed requiring compliance with AS 2890.1 and AS 2890.2 and any minor adjustments which may be required (if any) can be made at Construction Certificate stage.

### **Conclusion**

Overall the TIA therefore concludes that the Oakdale West Industrial Estate development is supportable on traffic planning grounds. Appropriate car parking can be provided, and the traffic impacts of the development can be readily accommodated by the planned road network in the vicinity of the site.

## **UPDATED ACOUSTIC ASSESSMENT**

A revised Noise Impact Assessment was undertaken by SLR based on the revised design changes and considerations. The revised NIA was completed on the basis of the following design changes:

1. An additional 20 m setback on the northern boundary to accommodate a proposed future development;
2. Minor layout changes to Lots 1A, 1C, 2A and 2B, and estate roads 01 and 04, to accommodate the additional northern boundary setback;
3. Modification of basin designs/locations;
4. Increased bushfire setback on the southern boundary to the east of the potential future link road;
5. Minor layout changes to estate road 07 and Lots 4A and 4E to accommodate the additional southern boundary setback;
6. Raised pad heights for Lot 2B (2.5m higher) and Lot 2E (3m higher)
7. Addition of an amenities lot adjacent to the northern boundary, between estate road 01 and the proposed Western North South Link Road.

Operational noise from the development has been modelled using the SoundPLAN noise model prepared for the original DA NIA. This model was updated with the September 2018 design changes to the lots, buildings, pad heights, topography and site roads.

The noise modelling reflected the removal of some noise barriers included in the original scheme, including NW.01, NW.05 and NW.06 as these barriers are no longer required to mitigate noise impacts in the September 2018 design.

The modelling also includes a revised configuration of noise barrier NW.08 on the southern boundary and removal of NW.07.

It is noted that NW.07 was removed following consultation with the adjacent residential property owner who expressed a preference for at-property treatment in lieu of a noise barrier on their boundary.

Overall, operational noise emissions from the development are predicted to comply with the relevant criteria at the surrounding sensitive receivers with the exception of the nearest residential property in Kemps Creek.

Predicted noise levels at the Kemps Creek receiver have increased compared to the previous design due to the previously recommended noise barrier adjacent to this property being removed from the noise model (NW.07). It is noted that the removal of this barrier is predicted to have a negligible effect on other sensitive receivers in Kemps Creek.

The acoustic assessment concludes that the predicted operational noise impacts from the September 2018 design are generally consistent with the previously assessed noise impacts. Assuming the nearest receiver in Kemps Creek is offered at-property treatment the impacts are considered suitable from a noise perspective.

#### **Mitigation Measure**

Goodman intends to provide at-property mitigation measures to the adjacent residential property at 20 Adlington Lane, Kemps Creek. A condition to reflect this commitment can be included on any consent issued.

## **UPDATED VISUAL ASSESSMENT**

A revised Visual Impact Assessment has been completed by e8urban based on the above modifications.

The assessment determined that whilst the proposed changes to the pad level on Lots 2B and 2E may be visually discernible, they do not represent a significant departure from the established pattern of building form, bulk and massing of the buildings assessed in the VIA 2017.

On this basis it is recommended that no changes are required to the proposed visual mitigations in the form of the landscape treatment already developed for the precinct. It is considered that the landscape mitigation measures will appropriately buffer the visual impact of the proposal, as amended.

## SUMMARY ASSESSMENT

Overall, the resultant updated Masterplan and Stage 1 design and proposal is considered to be acceptable on both Planning and Environmental grounds, given that the proposed amendments have been implemented having regard to site constraints and further detailed investigations. It is considered that even though the overall GFA across the site has been reduced, the overall benefits and amenity outcomes of the revised Masterplan will facilitate a better outcome for both the site and the surrounding areas, whilst also accommodating the 60m freight corridor in TfNSW's preferred location.

Overall, the amended masterplan layout does not require the amendment to or addition of mitigation measures included in the original EIS report, as amended by the RtS dated 8 May 2018. The updated plans and consultant reports accompanying this report confirm that the impact from the amended layout can be appropriately managed and that no greater impact will result from the proposed amendments.

I trust that this information and the accompanying updated consultant reports satisfactorily address and respond to the four outstanding issues raised by NSW Government Authorities in respect to the Oakdale West Estate proposal.

Should you require any further information or clarification please contact me on [jparker@urbis.com.au](mailto:jparker@urbis.com.au) or Guy Smith from Goodman on [guy.smith@goodman.com](mailto:guy.smith@goodman.com).

Yours sincerely,

A handwritten signature in black ink, appearing to read "JParker", with a stylized flourish at the end.

Jacqueline Parker  
Director