

28 April 2025

2200446

Lindsey Blecher
Team Leader, Industry Assessments
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street,
Parramatta NSW 2150

Attention: Sam Burns, Environmental Assessment Officer, Industry Assessments

Dear Sam,

**Response to Request for Additional Information – Westlink Industry Park – Stage 1
Modification 6 – Warehouse 3 Customer Design Changes (SSD-9138102-Mod-6)**

This letter has been prepared on behalf of ESR Developments (Australia) Pty Ltd ('ESR Australia & New Zealand' or 'the Applicant') in response to the Request for Additional Information issued by the Department of Planning, Housing and Infrastructure (DPHI) dated 17 April 2025 in relation to Modification 6 (MOD 6) to the Westlink Industry Park – Stage 1 (SSD-9138102-Mod-6).

The Request for Additional Information requested that the Applicant respond to the matters raised in the government agency feedback received, including Penrith City Council (Council), Transport for NSW (TfNSW), and Fire and Rescue NSW (FRNSW).

The Applicant's response to the matters raised by government agencies is provided in **Table 1** below.

Table 1 Response to Government Agency Comments

Comment	Applicant Response
Penrith City Council	
Planning Considerations	
<ul style="list-style-type: none"> <i>The modification proposed significant increases to the GFA of the ancillary office. The scale of the office extension raises questions as to whether the office component remains ancillary to the development. The Department should therefore be satisfied that the proposed office is ancillary to the primary warehouse use.</i> 	<p>The proposed modifications result in an increase to the ancillary office space component of Warehouse 3 from 480m² to 2,400m². The proposed ancillary office space area (2,400m²) represents 16% of the overall Gross Floor Area (GFA).</p> <p>Section 5A.6D(2) of <i>State Environmental Planning Policy (Exempt and Complying Development Codes) 2021</i> (Codes SEPP) provides guidance on the maximum GFA for ancillary premises in relation to industrial and business development:</p> <p>(2) <i>The maximum gross floor area for industrial retail outlets or ancillary office premises is the lesser of the following—</i></p> <p>(a) <i>the maximum gross floor area that applies under another environmental planning instrument,</i></p> <p>(b) <i>30% of the gross floor area of the building,</i></p> <p>(c) <i>5,000m².</i></p> <p>Under the proposed modifications, the ancillary office component is less than 30% of the total GFA, and does not exceed 5,000m². Further, the proposed ancillary office space will support the dominant use of Warehouse 3, being for the purposes of <i>Warehouse or distribution centres</i>, and therefore characterised as being ancillary.</p> <p>On this basis, the proposed modifications to the ancillary office component remain ancillary to the dominant use and is therefore permissible with consent.</p>

Comment

Applicant Response

- *The large office component will be situated approximately 125m north of the car park for the site. Considering the number of employees there is concern for conflicts between truck accessing the site and the employees that will need to walk to enter the office. Please re-consider the location of the car park to be closer to the main office component or alternatively provide internal pedestrian paths to ensure the visibility to minimise the potential for conflicts.*

The subject car parking has been purposefully positioned on the southern portion of the hardstand area by the Applicant and future tenant to not impact on the efficiency of warehouse operation. Warehouse 3 is a splayed warehouse with the southern portion comprising a reduced depth. Therefore, the positioning of the overflow car parking on the northern portion would create longer distances between on-grade loading docks and racking, increasing internal freight loading/ unloading times.

The proposed 62 car parking spaces on the hardstand represent overflow spaces from the primary car park located on Lower Ground Floor which includes 84 spaces (incl. 2 accessible spaces). The primary car park will be utilised by office workers, who would only utilise the overflow car park once the primary car park is at capacity (peak periods), with the overflow car park to be primarily used by warehouse workers.

This arrangement ensures pedestrian access is optimised and travel distance is minimised for each worker group. As illustrated in **Figure 1**, warehouse workers would utilise pedestrian access adjacent to the dock office directly from the overflow car park. In the event office workers occupy the overflow car park, suitable access is available via the pedestrian pathway along the Access Road.

The future tenant on the Site will manage car parking on-site in accordance with an Operational Traffic Management Plan (OTMP) in accordance with Condition B3A of the development consent for SSD-9138102.

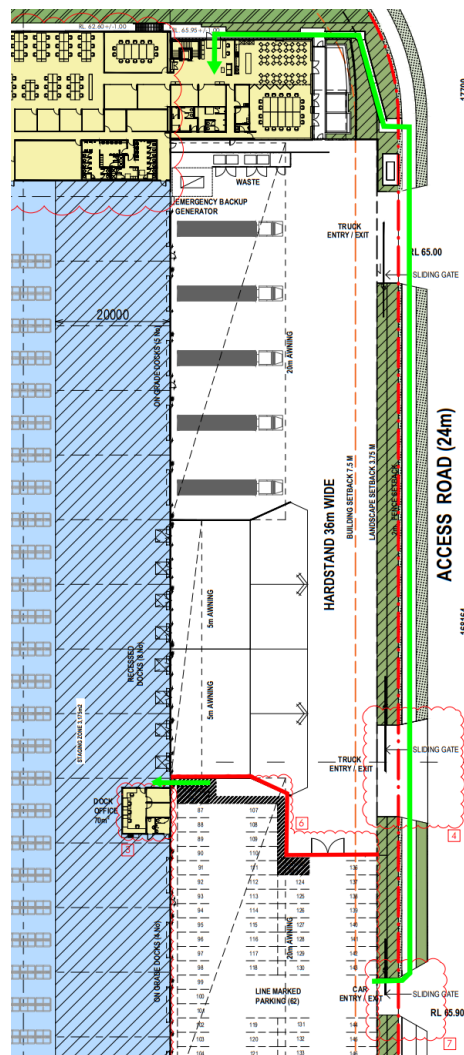


Figure 1 Pedestrian Access Plan

Source: ESR Australia & New Zealand

Comment	Applicant Response
Traffic Considerations	
<ul style="list-style-type: none"> The applicant must submit swept path diagrams to show manoeuvring of 30m A-double vehicles into the site. 	<p>The Applicant provided swept paths for a 30m A-Double on AG01 at Attachment 1 of the Traffic and Transport Statement (Appendix F of the Modification Report). This represents the largest vehicle that will access the Warehouse 3 hardstand area and demonstrates compliance. It is therefore consistent with Section 4.6.1 Control 10 of the <i>Mamre Road Precinct Development Control</i> (MRP DCP).</p> <p>The internal road network has been previously tested and approved under SSD-9138102 to accommodate a 36.5m PBS Level 3 Type A vehicles in accordance with the MRP DCP.</p>
Transport for NSW	
<ul style="list-style-type: none"> The proposed modifications are minor in nature and do not propose any changes that significantly increase the traffic generation of the site and the development remains generally consistent with the approved Concept Master Plan of the site (SSD-91138102). 	Noted.
<ul style="list-style-type: none"> TfNSW advised that concurrence would be provided in accordance with clause 2.35 of the State Environmental Planning Policy (Industry and Employment) 2021 subject to Department's approval and the following TfNSW conditions being included in the Development Consent. 	Noted.
Road Works	
<ul style="list-style-type: none"> To mitigate the traffic impacts of the proposed development and consistent with the LOG East package of roadworks that supported the approval of the concept masterplan, TfNSW requires that prior to occupation of the proposed warehouse the following components of the LOG East package of road works shall be completed: <ul style="list-style-type: none"> The signalised intersection of Mamre Road and Abbotts Roads Abbotts Road widening between Mamre Road and Aldington Road 	Noted.
Construction Traffic Management Plan	
<ul style="list-style-type: none"> To mitigate the impact of construction traffic, prior to the commencement of any works on-site (including demolition works) associated with any stage or prior to the issue of any Construction Certificate, whichever occurs first, a Construction Traffic Management Plan (CTMP) shall be submitted to Council and TfNSW for review and approval. 	<p>The Applicant is currently managing construction traffic associated with the construction of Warehouse 3 in accordance with the CTMP that satisfies Condition B1 of the development consent for SSD-9138102 and has been approved by the Planning Secretary.</p> <p>The Applicant does not propose to amend Condition B1 of the development consent for SSD-9138102.</p>
Fire and Rescue NSW	
<ul style="list-style-type: none"> FRNSW refers to our previous letter dated 26 October 2022, Advice on Amendment Report (D22/100082), for Westlink Industrial Estate (SSD-9138102). All recommendations made in this letter remain applicable to this project. FRNSW submit no additional comments or recommendations for consideration, nor any requirements beyond that specified by applicable legislation at this stage. 	Noted.

We trust the above responses address the matters raised. If you wish to discuss the above further, please feel free to contact the undersigned or Grace Macdonald (NSW Planning Manager, ESR).

Yours sincerely,

A handwritten signature in black ink, appearing to be 'LJ' with a stylized flourish.

Lachlan Jones
Senior Urbanist, Planning
ljones@ethosurban.com

A handwritten signature in black ink, appearing to be 'Curtis' in a cursive script.

Christopher Curtis
Director, Planning
ccurtis@ethosurban.com