

HITCHENS SELF STORAGE
142 Old Bathurst Rd Emu Plains
Alterations & Additions to Existing Industrial Use

STATEMENT OF ENVIRONMENTAL EFFECTS

**accompanying a development application to
Penrith City Council**

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1. INTRODUCTION

1.1. Purpose of Report

This report accompanies a Development Application (DA) seeking Penrith City Council (Council) approval for alterations and additions to the existing Hitchens Self Storage facility at Old Bathurst Rd, Emu Plains.

The objectives of this report are to:

- Describe the existing site in its context
- Provide information on the proposed site development
- Provide an analysis of the planning controls relevant to the site development
- Provide an analysis of the key issues and implications of the proposed development.

1.2 Summary

The proposed development is intended to increase the storage capacity of the existing Hitchens Self Storage premises at Old Bathurst Rd Emu Plains. A new purpose-built building would approximately double the existing storage space.

Self-storage premises are unusual development "types", characterised by their relatively low levels of activity day-to-day but quite high floor space demands. There is good data available on existing site visitation levels which confirm the idiosyncratically low traffic generation characteristics of this use in general and this site itself. With the proposed increased floor area, site visits would be expected to not exceed 31 visits per day over a 16 hour period. Large vehicles would visit only in the order of 6 times per month, and turning path analysis (and operational evidence) indicates satisfactory movement is available. The site's location on a flat section of Old Bathurst Rd with good sight distances, and reserved land opposite, makes for satisfactory ingress egress movements.

The site location, with a strong vegetated screen along the western boundary, means that the built form can also be satisfactorily accommodate in the setting in a visual sense. A visual impact assessment accompanies the DA, noting that the existing building and vegetation constrains sightlines to the new structure, except for the front which would present well with this landscape backdrop.

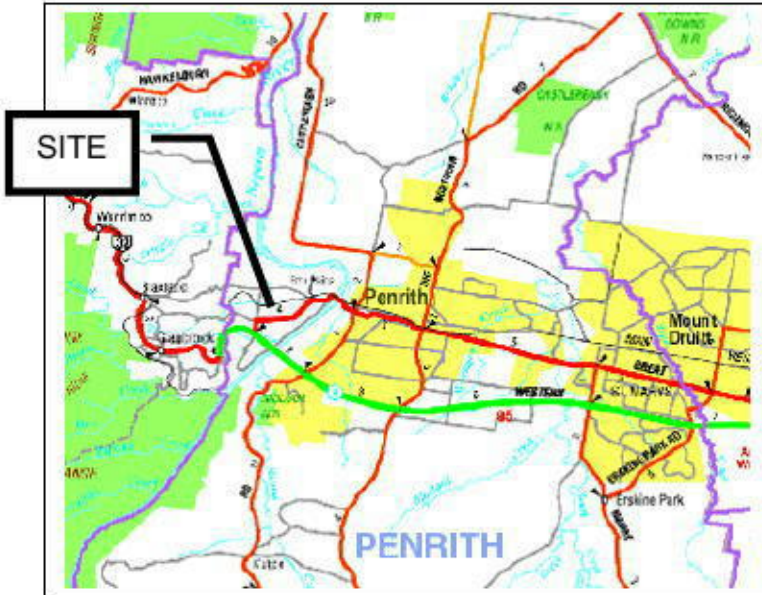
The development area is outside the flood planning land map area as designated in Penrith LEP 2010. However an expert analysis of this issue and also OSD and requirements accompanies the application.

The site abuts a reservation which contains a concrete lined channel. In a noteworthy development, recent changes to the Water Management Act and Regulation remove requirements for a "controlled activity approval" for development in such circumstances. Details are provided in the body of the report.

This report examines issues raised in a pre-lodgement consultation with Council and broader planning issues under statutory and DCP provisions. Overall this project presents as an orderly use of this industrially zoned land with good potential to make a positive contribution in terms of future capital investment in the City of Penrith, while also meeting the increasing needs for flexible storage for goods by residential, government and commercial (especially small business) sectors, as a part of modern living.

2. SITE CONTEXT

2.1 Location and Site Details



The subject site is located at 142 Old Bathurst Rd Emu Plains (Lot 8 DP 1105133). Emu Plains, a diverse suburb to the west of the Nepean River in Penrith LGA, accommodates a range of commercial, industrial, institutional and residential land uses.

The Hitchens Self Storage site is located within the Emu Plains industrial precinct which is located north and west of the main western rail line. The site fronts Old Bathurst Rd which forms the northern bounds of a new industrial land release.

Figure 1: Site in Context

Lot 8 is almost rectangular in shape and has an area of approximately 8170m². The site's frontage is to the north and Russell Street and has a length of some 64.4m, not including a minor splay at the north-west corner. The site depth is approximately 123m. The parcel is slightly off rectangular in shape with the western boundary aligning to a reserve accommodating a concrete lined channel.



Figure 2: Locality (photo source: NSW Spatial Information Exchange)

The subject land is currently occupied by a large metal and concrete block, two level building. There are other improvements ancillary to this major building, including access and parking, landscape improvements, and container storage.

That portion of the site occupied by the existing development is generally level. However the western portion of the land, which would site the subject proposal grades down evenly to the west and the concrete lined stormwater channel which runs parallel to the site's western boundary.

Site Encumbrances

Lot 8 does have a number of easements and restrictions. The matter of particular significance to the DA was raised in the pre-DA meeting with Council:

Easement to drain water

Easement to drain water "numbered 1 in the plan"¹. This easement is of variable width and is shown on the accompany drawings. A restriction as to user ("numbered 10 in the plan") indicates that that part of the land subject to this drainage easement:

1. Shall not be used for the storage of vehicles, plant materials and other items likely to obstruct the free flow of floodwaters
2. Shall not have its surface level altered without the consent of Council, and
3. Shall contain fencing and landscaping of an open style which shall not obstruct the free flow of flood waters.

Penrith Council has the power to vary this restriction. However it is indicated in the accompanying documentation that there is no requirement to vary and that the application does not bring any non-compliance with this restriction.

Existing easements for access 7.5m wide, for Water Supply Services 2.5m wide and associated restrictions as to user are intended to be complied with. New stormwater detention facilities are proposed to augment existing but there is leeway within RAU number 5 for this to occur. Building setbacks would accord with the existing building in the site vicinity and RAU number 6 on the plan.

2.2 Existing Use and Background to Proposal

The site is presently in use as a self storage premises and for container storage associated with this use. The existing development comprises a single metal and concrete building of some 4000m² total GFA (approx 2000m² each level). The building is encircled by a concrete driveway and beyond the bounds of the driveway the site is covered for the most part in a gravel base.

The front of the site presents neatly to the street with a feature front façade, drawing visual interest, and tidy low key landscaping in a front setback area which also services a stormwater detention purpose. There is an existing business identification sign adjacent and within the site boundary

Current staffing is one full time staff and one part time (about 30 hours per week). It is not intended to change staffing arrangements with the subject proposal. Office hours are Mon-Fri -

¹ See section 88B instrument accompanying DP1105133

9am-5pm, Sat - 9am-3pm. But tenants are able to access the site 7 days per week 6am to 10pm.

Site ingress and egress is off Old Bathurst Rd. There are six marked parking spaces in the front of the building. However the mode of use of the facility is that storage patrons have an access key to open the security gate. They would then park adjacent to their storage area if at ground level, or park near to one of the four internal hoists for access to the upper level storage areas. It is thus only new patrons or commercial visitors that have a need to park in the front areas of the site.



Photo 1: View to the site from Old Bathurst Rd with escarpment backdrop. AGM Engineering in the foreground

Previous Approvals

The principal operational consent is Council's DA 10/0289.01 which approved development on the site and was dated 29 June 2010.

DA 11/0276 was approved to allow the storage of containers on the site.

2.3 Physical Context

The site is on the northern edge of the Emu Plains industrial precinct and forms part of the newest industrial subdivision in this area of Penrith LGA employment lands. Much of this precinct remains vacant but AGM Engineering adjoins to the east. This business is involved in light fabrication, as well as general and precision engineering.

As indicated a concrete lined channel separates the subject site and the new industrial estate from the older part of the Emu Plains employment precinct. Reports cited by Council in a pre-DA lodgement meeting for this project indicate that the 1 in 100 year ARI (Average Recurrence Interval) flood event flows across Emu Plains from the south and remains within the concrete lined channel. Prelodgement advice from Council also confirms that it is the 1 in 100 year flood event that is typically adopted for flood planning requirements.²

² Council's letter dated 4/2/2013 provided notes on a Pre-DA lodgement meeting which according to the letter was held on 27/11/2012. The flood study which was referenced in the meeting was by Patterson Britton and Partners for Paclib and dated February 2005.

Immediately west of the channel is the large premises of ACO Concrete Products. The operations main building is well setback from Old Bathurst Rd and landscaping at the north-eastern edge of that site provides what is an effective visual screen for the proposed development.

Across Old Bathurst Rd to the north of the site is a large open. Further east is the minimal security Emu Plains correctional centre.

The closest residential land to the site fronts Russell Street over 320m to the west of the site at its nearest point

2.4 Statutory Context

Zoning

As indicated in the figure below, the site is located along the northern boundary of the IN1 General Industrial zone under Penrith Local Environmental Plan (PLEP) 2010. Self-storage units are a permissible use within this zone.

The large open land to the north is zoned SP1 Correctional Centre. East of Russell St is residentially zoned land and there is a small area of light industrial zoned land between the correctional centre lands and the residential precinct. A larger strip of land along Russell Street remains as a deferred matter in PLEP 2010.



Figure 3: Zoning Map (Source legislation.nsw.gov.au)

The proposed use meets the definition of self-storage units, permissible in zone IN1 of PLEP 2010.

LEP Controls

Height of Buildings – A 12m building height applies to the site. Building height controls refer to height above natural surface levels (see definitions to PLEP 2010). The building would comply with this control as indicated below:

- Building maximum height at low (south-western) corner of building area of site = 31.90m (to parapet level)
- Natural surface level at the low corner of the site (south-west corner) = 22.50m
- Height control at this point – 22.5m + 10m = 32.50m

So even taking a conservative position the building height is some 0.6m within this control according to DA plans. It is noted that even the alucobond panel (highest point of the building) would also comply according to plan information – however this feature panel is not located in this lowest area of the site.

Scenic and Landscape Values Map – the site is included in the land so identified. A visual impact assessment of the subject proposal has been undertaken as the required response to Clause 6.5 Protection of scenic character and landscape value. This VIA accompanies the lodgement documentation.

PLEP 2010 does not provide any controls of relevance to this proposal in regard to: floor space ratio, land reservation and acquisition, heritage, natural resources sensitivity. The land subject to the development is located entirely outside the area identified in PLEP 2010's Flood Planning Land Map. See Figure below.



Figure 4: Excerpt from Flood Planning Land Map PLEP 2010.

The question of flooding and site hydraulics is considered in documentation submitted by Kneebone Beretta & Hall.

A Site Analysis drawing is overpage.

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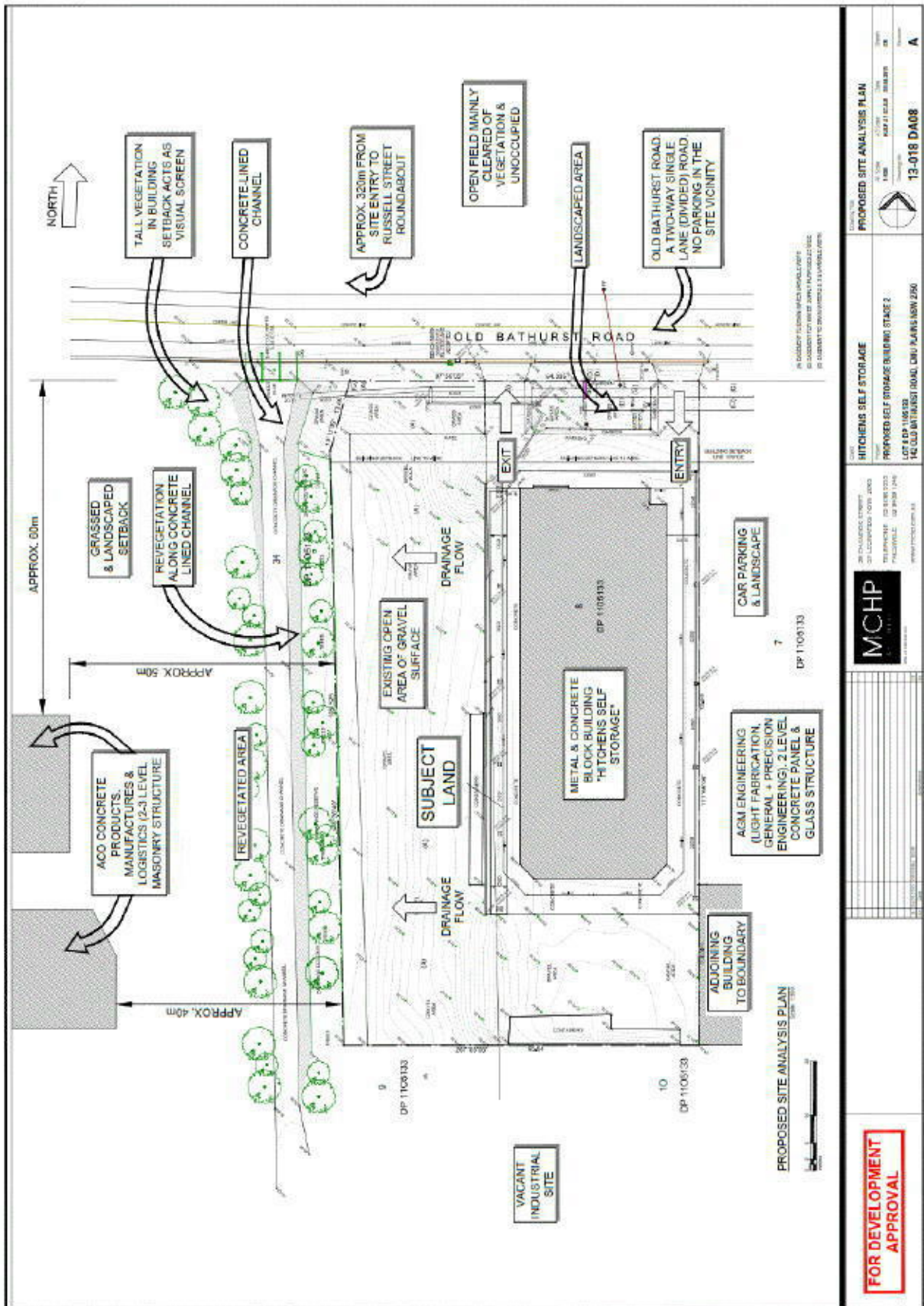


Figure 5: Site Analysis

2.5 Services

The accompanying site survey provides details of available services on site and adjoining the site. We are advised that all required services are available to the site at present or can be provided for the proposed development.

3. PROPOSED DEVELOPMENT

3.1 Self-storage Concept

Self-service storage warehouse complexes were introduced to Australia in the mid-1970s and demand has increased over recent years. They provide for easily accessible storage of articles by individuals, small businesses and others in need of the temporary space.

Self-storage premises are directly supportive of compact city living, an increasingly important area of urban policy in Australia. With moves to higher densities and smaller homes including in Regional Cities such as Penrith LGA, there is an increasing demand for more flexible storage as consumers find insufficient room for storage within individual dwellings. The demand for self storage has increased in response to these demographic and housing supply and cost trends. Self-storage now provides an important and efficient service to the domestic sector.

This service has also provided a quite positive and dynamic influence on the small office and home office (SOHO) business sector and smaller scale trade operations, which have been among the nation's economic success stories over the past few decades. Off-site self-storage can provide convenient and affordable storage for business records, files and equipment, and for the storage of products when the alternative of securing extra floor space can be impractical or prohibitively expensive for smaller businesses which have grown beyond home-based storage. For example, the existing Hitchens operation at Emu Plains accommodates carpet businesses, mobile coffee vendors, book storage, footwear traders including overseas importers.

The Emu Plains site also provides a service to the defence sector. Australian defense authorities have a need to move personnel around the country and there is a growing demand for storage needs associated with defence personnel at the Emu Plains site.

Self-storage complexes can reasonably be expected to provide an increasingly important service to Penrith and the wider area for residential, commercial as well as special use sectors like defence support.

3.2 The Proposal

The Proposed Scope of Works

The main components of the project are as follows:

1. Site preparation
2. Construction of a new two level glass and metal clad structure, including associated access and additional parking
3. On-site bio-retention system for stormwater management.
4. Landscape, fencing and other ancillary changes.

Site Preparation

The site is already cleared of vegetation and sits readily available for typical site preparation works including any pre-construction requirements from the development consent and future construction certificate. No filling is necessary, or proposed, on the site.

New Building Works

The major aspect of the proposed development is to construct the new storage premises and integrate these alterations and additions to the existing operation. The accompanying architectural drawings show the detail of the proposed changes. An additional floor space of some 4465m² is proposed. The intent is to construct a partially pierced concrete podium which would form the structural base for the self-storage premises. The podium level would finish flush with the existing western roadway within the site.

Proposed external materials would generally match and coordinate with the existing structure. Details are indicated in the accompanying architectural plans and include:

- Provision of a feature front façade comprising, prominent glazing to let in light, a lateral smooth face concrete panel below custom orb corrugated sheeting colorbond "woodland grey" in colour, and prominent glazing along the front facade. A red alucobond aluminium panel on a steel frame matching the existing building highlights the building visual appearance.
- Principal wall cladding to comprise custom orb corrugated sheeting colorbond "shale grey" in colour. Roller shutters would also be coloured shale grey.
- Roofing would comprise zincalume roof sheeting consistent with the existing building on site and falling to a colorbond fascia gutter. Guttering would be colorbond.
- The area under the padding would be finished with a galvanised mesh screen, hinged at the top to allow flexibility to swing with any water flow.
- Walls and roof elements are broken up by adjustable clear glass louvres and roof ventilators respectively, both of which assist with energy efficiency.

The storage space will be divided into individual secure compartments with a range of capacities/formats. Hoists will connect between the storage levels.

Access and Parking

Access arrangements will integrate with the existing operation. The DA drawings indicate a one-way traffic flow which can be readily controlled with the controlled access arrangements. Visitor and new business parking is provided at the front of the site with six additional spaces.

Stormwater management

DA lodgement drawings indicate detailed stormwater management proposals for the site, including on-site detention arrangements.

Landscape and fencing

Taylor Brammer has prepared a landscape scheme for the site which generally seeks to integrate with the landscape strategy adopted for the existing site. Fencing at the street frontage would provide for black palisade style metal fencing to match existing. A new chain wire fence would be erected along the western boundary.

3.3 Operational Details

Base Operations

Self storage premises have a very straightforward operations model. This proposed additional storage space would simply extend the existing operating system, whereby individuals and organisations rent storage space from the supplier for varying time periods. Those renting space would initially register their interest either through the office operations in the existing building, or through telephone/web-based contact, and appropriate contractual arrangements would be made. Tenants would gain access through security gates via a personal security code provided by Hitchens. The actual delivery or removal of stored goods occurs within the secured space on the site (ie parking along the access driveway). See **Section 4.1** for details on traffic).

This operation also includes a limited amount of container storage on site. A dedicated area at the rear of the site is made available for this purpose.

Staffing Levels

Current employment levels are 1-2 persons throughout the day and these staffing levels would not change with the subject proposal.

Trading hours

Office hours are limited Mon-Fri - 9am-5pm, Sat - 9am-3pm - it is proposed that there be no restrictions on operating hours for the site. At present tenants can access their storage space between 6am and 10pm 7 days. However, as there are no adverse effects should the permitted access hours change, it is suggested that Council not impose operating hour limitations in this instance.

Vehicle Movement and Parking

The proposal provides for retention of the existing ingress/egress arrangements off Old Bathurst Road, with one-way traffic movement. The current front parking of six spaces would be doubled with the subject proposal.

Waste Management

A waste management plan is submitted with the proposal.

4. ASSESSMENT

4.1 Overview of Key Planning Issues

As introduced at **Section 3.1** self storage premises provide a useful service to residential, commercial and government sectors. This form of development is aligned with broader planning objectives concerned with how we might become more efficient in the use of land in attending to Sydney's continuing population expansion. Nevertheless, it is important that any development is sensitive to its context and statutory requirements. This section of the report examines relevant assessment issues, as raised in the pre-DA lodgement meeting with Council and more generally. The issues to be examined are summarised as follows:

- Development Siting and Drainage/Flooding Considerations
- Consultation with Office of Water
- Traffic, Access, Parking and Pedestrian Movement
- Protection of Scenic Character and Landscape Values
- Storage of Shipping Containers
- Other related issues.

Development Siting and Drainage/Flooding Considerations

This proposal would occupy an area of the site which is affected by an easement to drain water. The associated restriction as to user indicates that the subject land:

1. Shall not be used for the storage of vehicles, plant materials and other items likely to obstruct the free flow of floodwaters
2. Shall not have its surface level altered without the consent of Council, and
3. Shall contain fencing and landscaping of an open style which shall not obstruct the free flow of flood waters.

Pre-lodgement discussions included stormwater and flooding-related issues and Council requested expert analysis be undertaken for the proposal. The proponents have engaged Kneebone, Beretta & Hall for this work and it is provided under separate cover.

Flooding

It was acknowledged at the pre-lodgement meeting that a flood report was prepared for the original Paclib subdivision of the site³. This work established that in the 1 in 100 year ARI (Average Recurrence Interval) flood event the flood flows would be confined to the concrete lined channel to the west of the site. While 1 in 200 Year ARI event would bring flooding to the easement, Council acknowledges that it is the 1 in 100 year ARI "which is typically adopted for flood planning requirements". In line with this it is noted that the Flood Planning Map in PLEP 2010 does not affect the area subject to the proposed development.

A separate submission on this DA from Kneebone, Beretta & Hall⁴ notes the previous flood study, the underside levels of the proposed building works (above 1 in 100 ARI Flood levels), the spacing and diameter of concrete columns supporting the structure and advises that

³ Paclib flood study prepared by Patterson Britton & Partners dated Feb 2005. Source: Council pre-lodgement advice dated 4/2/2013

⁴ Dated 5/6/2013.

the proposed construction will have "minimal, if any, effect on the flow of the 1 in 200 year floodwaters". This work determines that mindful of the prior flood study work by Patterson Britton and Partners and the levels adopted for the project "a further flood study is not required for this development".

On-site detention

A further restriction as to user referred to on-site stormwater detention requirements for the site. Kneebone, Beretta & Hall has prepared a stormwater and OSD plan which is intended to align with principles of the initial Paclib subdivision work by Patterson Britton. This plan indicates under surface OSD tanks at the rear of the site and along the western driveway. A large bio retention basin is proposed in the site setback area and extending under the proposed concrete slab.

Consultation with Office of Water & Water Management Act Provisions

Pre-lodgement meeting advice was to contact the Office of Water regarding a controlled activity approval under s91 and s91E of the Water Management Act 2000. If such an approval was required this DA would be *integrated development* under s91 of the EPA Act. Section 91(2) Water Management Act refers to controlled activity approvals conferring rights to undertake activities on "waterfront land". Then under s91E of the Water Management Act, it is offence to carry out such activities without a controlled activity approval from the Office of Water. Under previous interpretations, land fronting concrete lined channels have been considered as "waterfront" under the provisions of s91(2), and the Office of Water has been involved in assessing DAs within 40m of channels. Vegetation Management Plans have on occasions been required, sometimes incongruously having regard to the urbanised nature of the concrete channels.

Contact was made with the Office of Water and advice was provided on relatively recent changes to the legislation which provide an exemption from the requirement to hold a controlled activity approval for any activity carried out on waterfront land where the channel of the river is fully concrete lined or is a fully enclosed pipe channel. This provision is now included at clause 39 and clause 26 in Part 2 of Schedule 5 of the new Water Management (General) Regulation 2011, as follows:

39. Controlled activities—persons other than public authorities

A person (other than a public authority) is exempt from section 91E (1) of the Act in relation to controlled activities specified in Part 2 of Schedule 5 that are carried out in, on or under waterfront land

Schedule 5 Clause 26. Activities on waterfront land if river is concrete lined or in pipe

Any activity carried out on waterfront land relating to a river where the channel of the river is fully concrete lined or is a fully enclosed pipe channel.

According to our understanding of the oral advice from Office of Water that there is no longer any interest in this matter, these provisions confirm that there is no longer any requirement for a controlled activity approval for development on this site.

Traffic, Access, Parking and Pedestrian Movement

This section of the report outlines the nature of the road system in the site vicinity and assesses the adequacy of traffic movement and parking arrangements.

The proposed development fronts Old Bathurst Road a two-way regional road with "no parking" on either side of the carriageway in the site vicinity. The road gradient is generally level in the site vicinity and enjoys good site distance. The nearest intersection is the single-lane roundabout at Russell St, another regional road, located some 320m to the west. This

configuration presents as having a good capacity to accommodate what will be shown to be very minor proposed increases in traffic entering and egressing the site.

Traffic Generation

Self storage development is a quite idiosyncratic land use which is characterised as requiring quite large land take but with relatively low proportionate site activity levels. Traffic attending the site can firstly be divided into 1) existing tenants (ie those accessing their leased storage space beyond the security gate) and 2) visitors/new customers who need to attend the office and park in the marked areas at the front of the site. We are advised that the existing six "visitor" parking spaces are never fully occupied. The proposed development would double the provision of this visitor parking space to 12, which would be more than adequate for this component of the attending traffic demand group.

By far the most frequent vehicle type accessing into the secured area of the site is passenger vehicle. Less than 1 in 10 of these vehicles enter with an attached trailer. A smaller proportion of small rigid trucks (3 tonnes) attend the site estimated at 3 per week. Tenants will park in front of their roller shutter door or adjacent to one of the four hoists in the existing building.

It is reasonable to extrapolate the volume of traffic activity for the proposed development from traffic counts taken for the existing site operation. Data has been collected for the two week period 1 May 2013 to 14 May 2013. This data is direct output from electronic from security keypads (ingress and egress). The data is summarised as follows. An edited version of the original data is provided at **Annexure A** (names of tenants have been removed).

Date	No of Clients	First entry (hrs)	Last exit (hrs)
Wed 1 May 2013	15	7.52	19:02
Thurs 2 May 2013	7	7.07	21.17
Fri 3 May 2013	19	6.21	20.56
Sat 4 May 2013	18	7.50	19.44
Sun 5 May 2013	16	9.41	18.43
Mon 6 May 2013	13	8.36	15.5
Tues 7 May 2013	9	9.05	16.06
Wed 8 May 2013	13	6.34	20.07
Thurs 9 May 2013	16	6.12	21.31
Fri 10 May 2013	14	9.38	21.23
Sat 11 May 2013	26	6.25	17.43
Sun 12 May 2013	11	9.56	16.47
Mon 13 May 2013	11	5.11	17.21
Tues 14 May 2013	10	6.45	19.21
Total	198	5.11	21.31

Average site visits over 2 weeks = 14.1 client visits per day, with some evidence of peaking at weekends.

Far less frequent at this site are larger sized trucks (container trucks, furniture vans, semi-trailers). The existing development includes container storage at the rear. The vehicle that delivers/removes the containers is an 8.8m rigid truck. The estimated frequency of this truck, and larger (eg 12m) furniture vans is less than 1 per month. Articulated semi-trailers attend the site 2 times per month maximum⁵.

⁵ Data supplied by operator of the existing facility.

Estimated Future Traffic Generation

The existing development is estimated at 4000m² GFA. The proposed development would add an additional 4465m² GFA. Thus the proposal would increase the available floor area for leasing by approximately 112%.

Item	Existing	Additional Traffic Estimates (increase 112% reflecting additional floor area)	Total Traffic Estimates
Staff visits – no change	1-2 staff per day	Nil	No change
New customers and commercial visits	5 per day (approx)	5.6 per day	10.6 per day (over 16 hour period)
Client visits (passenger vehicles, trailers and small rigid trucks)	14 per day	15.7 per day	29.7 per day (over 16 hour period)
Large rigid truck visits (9m, 12m rigid trucks)	1 per month (max)	1.1 per month	2.1 per month
Semi-trailers (up to 19m articulated vehicle)	2 per month (max)	2.2 per month	4.2 per month

Internal traffic movement and parking

Existing constructed internal access roadways and arrangements work satisfactorily for this site, and with the low visitation levels this would be expected to continue into the future. The security gates provide good opportunity to manage site access and it is seen as more appropriate to retain the one-way traffic flow within the site. The DA drawings show turning paths for a 12m truck demonstrating that a truck of that size can manoeuvre through the site. A 19m articulated vehicle can also access the site efficiently as shown in turning path drawings and by site experience.

Council and RMS (RTA) parking guidelines are not provided for self-storage premises and reliance is placed on empirical analysis of demand. It is clear from the above that there is more than adequate parking on site with the proposed development given the very low levels of visitation which can be expected. The major visitor group is existing client visits. But even this group would be expected to make only between approximately 2 and 5 visits per hour in total (ie including existing operations) based on the recorded data. This group travels directly inside the security gate and thus have large expanses of parking area available to them. Visitor and staff parking would be nearly double that which might be reasonably expected under current projections.

Given the low levels of client parking and the ready capacity for clients to park adjacent to their storage site or near to the entrance points within the secured area, it is not seen as necessary to identify a pedestrian management system for this particular site.

Site ingress and egress

This site enjoys high quality site distance both east and west along this level section of Old Bathurst Rd, with minimal visual obstructions. There is no traffic generating activity on the northern side of Old Bathurst Rd opposite the site, which might otherwise have brought possible conflicts. As indicated above site visitation levels are very low now and will be so

into the future expected to peak at less than 5-6 visits per hour, and if anything peaking on weekends rather than during peak periods for industrial settings. Trips by large vehicles are measured in single digits per month rather than per hour. This development would not be expected to place any unreasonable demands on traffic safety or convenience in this setting, or bring any unreasonable cumulative effect.

Protection of Scenic Character and Landscape Values

Clause 6.5 of PLEP2010 is concerned with protection of scenic character and landscape values. The Emu Plains area is identified in the Scenic Landscape Values Map in PLEP and as such the following requirement applies to the development proposal:

(3) Development consent must not be granted for any development on land to which this clause applies unless the consent authority is satisfied that measures will be taken, including in relation to the location and design of the proposed development, to minimise the visual impact of the development from major roads, identified heritage items and other public places.

The pre-lodgement meeting with Council referred to the need for a visual impact assessment and requested a "Category 2 VIA 2", for this proposal. A visual impact assessment accompanies this application. It finds that the proposal would not have an adverse effect on sensitive landscapes. The principal viewer positions would be from motor vehicles travelling along Old Bathurst Rd. The proposal is not viewable until the immediate approach when viewing from the west, principally due to the heavy vegetative screen to the west of the site, but also due to existing development screening. From the east the project would present as a quite minor extension to the established built form in this emerging industrial precinct. The magnitude of the visual impact of this proposal is low and this landscape setting is well able to accommodate the proposed development

Storage of Shipping Containers

On 20 May 2011 Council approved the storage of containers on the site (DA11/0276). The question of compatibility of the proposed additional development on-site and the existing container-related activities was raised in pre-lodgement discussions with Council. We have reviewed the relationship between the proposed development and the existing container operation. The two issues which warrant consideration here are 1) traffic/parking management and safety and 2) visual impact (see condition 2 of DA11/0276).

The traffic levels and general operations within the self-storage premises are clearly very low and expected to peak at only 5-6 visits per hour, but more usually at around 2-3 vehicles per hour. The proposed one-way loop system gives good clarity on movement and with the spacious carriageway widths

4.2 Other Assessment Issues

Council's DCP 2010 has been reviewed to identify any further assessment considerations. The table below responds relevantly to issues raised.

DCP 2010 Section C

Clause	Topic	Comment
Section C1	Site Planning and Design	A site analysis accompanies the proposal. A Visual Impact Assessment accompanies the proposal.

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Clause	Topic	Comment
		<p>The design incorporates passive solar design features including feature glazing at the (northern) front building facade to let in light, other louvre glazing at the building facades, and roof ventilators. Sensor lighting means the use has relatively low levels of energy use.</p> <p>Building setbacks are consistent with the established pattern, and site landscaping plans demonstrate a reasonable response again generally consistent with established patterns. The strong landscape to the immediate west of the site (ie along the concrete lined channel) would provide a visual backdrop to the site. Old Bathurst Rd along this section is generally level including as it crosses the concrete lined channel west of the site. This proposal adopts the level gradient and the existing height plane within the establishing industrial precinct.</p> <p>While the local area is not residential or regularly used by pedestrians, the front glazing assists in regard to crime prevention by design.</p> <p>As demonstrated in the body of the report, visits to the site are less than 5 per hour and a spacious layout is available to visitors and tenants, with good levels of accessibility.</p> <p>Fencing is black palisade to accord with existing.</p>
Section C2	Vegetation Management	<p>The site is cleared and no vegetation is intended to be removed.</p> <p>The site is not subject to biodiversity or bushfire issues.</p>
Section C3	Water Management	<p>See accompanying stormwater management system by Kneebone Beretta & Hall including bio retention.</p> <p>The development area is outside the flood planning area as indicated in PLEP 2010. Expert advice is that a flood study is not necessary in the circumstances.</p>
Section C4	Land Management	<p>No significant earthworks required for this project beyond the stormwater management system.</p> <p>This is an initial use of an area approved for subdivision and industrial development. It can be assumed that contamination questions relating to any previous use of the land were addressed at subdivision stage.</p>
Section C5	Waste Management	<p>A waste prevention and minimisation plan is submitted with the application it nominates the intended waste products, proposed location of waste storage and arrangements for recycling.</p>
Section C6	Landscape Design	<p>See plan from Taylor Brammer landscape architects</p>
Section C7–C9	Heritage Public Domain Advertising/Signs	<p>Cultural heritage issues not raised with this proposal</p> <p>No significant public domain issue raised beyond the visual impact consideration outlined in the attached VIA</p> <p>The proposal does not provide for additional signs</p>
Section C10	Transport Access and Parking	<p>See body of the report for traffic assessment. This land use is characterised by very low levels of visitation and the site arrangements are spacious and appropriate.</p>
Section C	Subdivision, Noise,	<p>Subdivision and noise issues are not raised with this</p>

STATEMENT OF ENVIRONMENTAL EFFECTS • HITCHENS SELF STORAGE – EMU PLAINS

Clause	Topic	Comment
Other	Services	application. The site is well placed in regard to services and all services are already available or can be readily provided.

DCP 2010 Section D – Industrial Development

Clause	Topic	Comment
4.1	Key Precincts	The site is located in Precinct 9 and is entirely compatible development for this precinct and this setting within the precinct. See accompany VIA.
4.2	Building Height	Building adopts established height plane for this frontage of Old Bathurst Rd and meets PLEP 2010 requirements.
4.3	Setbacks and Landscape	The visual impact aspects of this issue are addressed in the accompanying VIA. There is an established building setback for this precinct via Restrictions as to Uer which is adopted in the proposal. The rear boundary includes a zero lot line which is appropriate use of this land. There are already examples of zero side setbacks in the development precinct.
4.4	Building Design	See body of report and VIA.
4.5	Storage of Materials	This use is centred on the storage of materials by private, commercial and institutional users. The site also includes external container storage from a previous approval. It is understood that the proponents restrict the storage of chemicals on site and as such no Chemical Use and Storage Report is required for this application.
4.6	Access and Servicing	The proposal provides for a continuation of existing site access arrangements. As indicated above site visitation levels are extremely low. See traffic assessment in body of report. Given the very low visitor levels and as visitors are able to park immediately adjacent to either the entry points to the building (or sometimes outside of the roller shutter of their ground level unit), there is no practical need for pedestrian marking on the site.
4.7	Lighting	The site is not located near residential development and is not likely to cause impacts. Lighting design would incorporate sensors and energy efficiency systems.

Section 79C (1) of the EPA Act

Section 79C (1) provides the assessment criteria by Council assesses development applications. A summary assessment is provided below with appropriate cross references:

In determining a development application, a consent authority is to take into consideration such of the following matters as are of relevance to the development the subject of the development application:

(a) the provisions of:

(i) any environmental planning instrument.

Addressed in body of report above.

(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority

We are not aware of any draft instruments of relevance.

(iii) any development control plan

Addressed in in body of report above.

(iiia) any planning agreement that has been entered into under section 93F, or any draft planning agreement that a developer has offered to enter into under section 93F, and

As far as we are aware there are no planning agreements of relevance.

(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph).

None relevant to the subject application.

(b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.

(c) the suitability of the site for the development.

Both addressed in detail within the body of the report.

(d) any submissions made in accordance with this Act or the regulations.

A matter for council consideration.

(e) the public interest.

Community, economic and environmental benefits would flow-on from the subject proposal.

ANNEXURE A**COUNTS OF CLIENT VISITS TO SITE**

BASED ON ENTRY/EXIT RECORDS FROM SECURITY GATES FROM 1/5/2013 TO 15/5/2013

NAME	ENTER TIME	EXIT TIME	DURATION		NAME	ENTER TIME	EXIT TIME	DURATION
			(Min)					(Min)
1/05/2013					8/05/2013			
Client #	7:52am	8:53am	61		Client #	6:34am	6:54am	20
Client #	7:59am	8:13am	14		Client #	8:42am	8:56am	14
Client #	9:05am	9:17am	12		Client #	10:59am	11:11am	12
Client #	10:21am	10:26am	5		Client #	11:18am	11:32am	14
Client #	11:25am	11:30am	5		Client #	11:59am	13:20pm	81
Client #	12:51pm	12:59pm	8		Client #	12:14pm	12:26pm	12
Client #	12:55pm	12:59pm	4		Client #	13:07pm	13:11pm	4
Client #	13:55pm	14:11pm	16		Client #	13:34pm	14:04pm	30
Client #	15:07pm	16:13pm	66		Client #	14:15pm	15:20pm	65
Client #	15:20pm	15:24pm	4		Client #	16:20pm	16:28pm	8
Client #	15:51pm	16:00pm	9		Client #	16:37pm	16:46pm	9
Client #	16:51pm	17:04pm	13		Client #	16:56pm	17:09pm	13
Client #	17:04pm	17:15pm	11		Client #	20:00pm	20:07pm	7
Client #	18:11pm	18:16pm	5		13 Clients in Total			289 min
Client #	18:55pm	19:02pm	7					
15 Clients in Total			240 min		9/05/2013			
					Client #	6:12am	6:18am	6
2/05/2013					Client #	7:18am	9:52am	154
Client #	7:07am	7:21am	14		Client #	9:10am	9:20am	10
Client #	9:10am	9:28am	18		Client #	10:05am	10:14am	9
Client #	14:09pm	17:54pm	225		Client #	10:09am	10:15am	6
Client #	14:52pm	14:56pm	4		Client #	11:03am	11:16am	13
Client #	16:14pm	16:15pm	1		Client #	11:54am	12:11pm	17
Client #	17:27pm	17:40pm	13		Client #	12:24pm	12:36pm	12
Client #	20:53pm	21:17pm	24		Client #	12:40pm	12:43pm	3
7 Clients in Total			299 min		Client #	13:37pm	14:47pm	70
					Client #	15:03pm	15:21pm	18
3/05/2013					Client #	15:16pm	15:59pm	43
Client #	6:21am	6:25am	4		Client #	15:20pm	15:32pm	12
Client #	8:30am	8:52am	22		Client #	15:35pm	15:41pm	6
Client #	10:11am	10:19am	8		Client #	16:48pm	17:49pm	61
Client #	10:35am	10:45am	10		Client #	21:29pm	21:32pm	3
Client #	10:50am	11:18am	28		16 Clients in Total			443 min
Client #	10:56am	15:23pm	267					
Client #	11:15am	11:21am	6		10/05/2013			
Client #	11:30am	12:09pm	39		Client #	9:38am	9:43am	5
Client #	11:40am	13:02pm	22		Client #	10:58am	11:22am	24
Client #	12:23pm	12:55pm	32		Client #	11:15am	11:23am	8
Client #	13:16pm	13:21pm	5		Client #	12:47pm	13:10pm	23
Client #	13:49pm	13:58pm	9		Client #	13:54pm	14:04pm	10
Client #	15:12pm	15:16pm	4		Client #	14:13pm	15:07pm	54
Client #	15:17pm	15:36pm	19		Client #	15:49pm	15:59pm	70
Client #	15:39pm	16:00pm	21		Client #	16:16pm	16:36pm	20

STATEMENT OF ENVIRONMENTAL EFFECTS • HITCHENS SELF STORAGE – EMU PLAINS

NAME	ENTER TIME	EXIT TIME	DURATION		NAME	ENTER TIME	EXIT TIME	DURATION
Client #	15:41pm	15:48pm	7		Client #	16:52pm	17:13pm	21
Client #	15:51pm	15:56pm	5		Client #	17:28pm	17:33pm	5
Client #	16:55pm	17:03pm	8		Client #	17:45pm	17:51pm	6
Client #	20:21pm	20:56pm	35		Client #	17:47pm	18:02pm	15
					Client #	18:21pm	18:31pm	10
19 Clients in Total			551 min		Client #	20:47pm	21:23pm	36
					14 Clients in Total			307 min
4/05/2013					11/05/2013			
Client #	7:50am	7:57am	7		Client #	6:25am	6:46am	21
Client #	9:26am	9:30am	4		Client #	7:00am	7:23am	23
Client #	11:14am	11:26am	12		Client #	7:59am	8:22am	23
Client #	11:21am	12:37pm	76		Client #	8:11am	8:23am	12
Client #	11:32am	17:17pm	345		Client #	8:26am	8:30am	4
Client #	12:18pm	12:31pm	13		Client #	8:42am	8:55am	13
Client #	12:23pm	14:12pm	109		Client #	9:15am	9:25am	10
Client #	12:45pm	13:00pm	15		Client #	10:15am	10:23am	8
Client #	13:02pm	13:24pm	22		Client #	10:28am	11:07am	39
Client #	13:26pm	13:36pm	10		Client #	11:16am	11:22am	6
Client #	13:37pm	14:09pm	32		Client #	11:29am	11:30am	1
Client #	14:12pm	14:24pm	12		Client #	11:40am	12:01am	21
Client #	14:49pm	15:00pm	11		Client #	12:08pm	12:40pm	32
Client #	15:07pm	15:23pm	16		Client #	12:37pm	12:41pm	4
Client #	16:20pm	16:29pm	9		Client #	12:38pm	12:42pm	4
Client #	16:54pm	17:00pm	6		Client #	12:47pm	13:00pm	13
Client #	17:02pm	17:08pm	6		Client #	13:04pm	13:23pm	19
Client #	19:41pm	19:44pm	3		Client #	13:12pm	13:24pm	12
18 Clients in Total			708 min		Client #	13:39pm	14:01pm	2
					Client #	14:29pm	14:40pm	11
5/05/2013					Client #	14:33pm	14:37pm	4
Client #	9:41am	9:51am	10		Client #	15:33pm	16:27pm	49
Client #	9:51am	10:39am	48		Client #	15:35pm	15:48pm	13
Client #	10:27am	10:40am	13		Client #	16:01pm	16:26pm	25
Client #	10:28am	10:37am	9		Client #	16:47pm	17:04pm	17
Client #	10:35am	11:13am	38		Client #	17:40pm	17:43pm	3
Client #	11:17am	11:53am	36		26 Clients in Total			389 min
Client #	12:31pm	12:51pm	20					
Client #	12:31pm	17:50pm	319		12/05/2013			
Client #	12:37pm	13:08pm	31		Client #	9:56am	9:59am	3
Client #	13:21pm	13:40pm	79		Client #	10:03am	10:15am	12
Client #	13:53pm	14:07pm	14		Client #	11:06am	11:12am	6
Client #	14:52pm	15:13pm	21		Client #	11:22am	11:34am	12
Client #	15:07pm	15:21pm	14		Client #	11:25am	11:40am	15
Client #	15:11pm	15:37pm	26		Client #	11:38am	11:58am	20
Client #	15:16pm	15:32pm	16		Client #	12:33pm	13:24pm	51
Client #	18:32pm	18:43pm	11		Client #	12:51pm	12:59pm	8
16 Clients in Total			705 min		Client #	15:40pm	16:02pm	22

STATEMENT OF ENVIRONMENTAL EFFECTS • HITCHENS SELF STORAGE – EMU PLAINS

NAME	ENTER TIME	EXIT TIME	DURATION		NAME	ENTER TIME	EXIT TIME	DURATION
					Client #	15:50pm	15:58pm	8
6/05/2013					Client #	16:38pm	16:47pm	9
SEMF	8:36am	8:54am	18		11 Clients in Total			166 min
Client #	10:51am	10:57am	6					
Client #	11:07am	11:19am	12		13/05/2013			
Client #	11:31am	12:42pm	11		Client #	5:11am	5:19am	8
Client #	11:48am	12:13pm	25		Client #	10:21am	10:29am	8
Client #	12:00pm	12:05pm	5		Client #	10:53am	11:16am	23
Client #	12:28pm	12:33pm	5		Client #	10:54am	11:01am	7
Client #	12:47pm	12:56pm	9		Client #	10:56am	11:16am	20
Client #	13:53pm	14:03pm	10		Client #	11:49am	12:02pm	13
Client #	14:05pm	17:47pm	222		Client #	12:23pm	12:33pm	10
Client #	14:34pm	15:08pm	34		Client #	12:53pm	13:09pm	16
Client #	14:47pm	14:56pm	9		Client #	13:09pm	13:17pm	8
Client #	15:40pm	15:50pm	10		Client #	15:37pm	15:46pm	9
					Client #	17:12pm	17:21pm	9
13 Clients in Total			376 min		11 Clients in Total			131 min
7/05/2013					14/05/2013			
Client #	9:05am	9:13am	18		Client #	6:45am	6:49am	4
Client #	10:10am	10:26am	16		Client #	9:08am	9:28am	20
Client #	10:54am	11:00am	6		Client #	9:29am	9:35am	6
Client #	11:04am	11:09am	5		Client #	9:53am	10:53am	60
Client #	11:39am	11:54am	15		Client #	11:20am	12:23pm	63
Client #	12:17pm	18:46pm	389		Client #	11:40am	11:44am	4
Client #	13:09pm	13:50pm	41		Client #	14:53pm	16:08pm	15
Client #	14:25pm	15:44pm	79		Client #	16:58pm	17:04pm	6
Client #	15:55pm	16:06pm	11		Client #	17:37pm	17:47pm	10
9 Clients in Total			580 min		Client #	19:10pm	19:21pm	11
					10 Clients in Total			199 min
					198 CLIENTS PER FORTNIGHT			
					AVERAGE IS 14 CARS PER DAY			



ARTIST'S IMPRESSION ONLY: THE COLOURS REPRESENTED ARE INDICATIVE ONLY.

NEW SELF STORAGE BUILDING HITCHENS SELF STORAGE

OLD BATHURST ROAD
EMU PLAINS, NSW 2750

APRIL 2013

| PRELIMINARY REVIEW REV C - 16.04.2013

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