

Planning, Transport and Regulation. DJaeger  
Reference: SDC2025/0004  
Phone: 02 4974 2768

10 June 2025

Thomas Bertwistle  
Planning Officer  
Industry Assessments  
**Department of Planning, Housing and Infrastructure**

Reply via email: [thomas.bertwistle@planning.nsw.gov.au](mailto:thomas.bertwistle@planning.nsw.gov.au)

Dear Thomas

<b>Development Application No:</b>	DPHI Ref: DA 25/6865 (CN Ref SDC2025/0004)
<b>Land:</b>	Lot 1 DP 1195449
<b>Property Address:</b>	295 Cormorant Road, Kooragang
<b>Proposed Development:</b>	Erection of self-storage units.

Thank you for engaging with City of Newcastle (CN) and providing the opportunity to comment on the above proposed development. The exhibited Statement of Environmental Effects (SEE), architectural plans and other supporting documents have been reviewed.

CN advises it is concerned with the adequacy of documentation provided in the development application (DA). It is recommended the applicant address the following matters prior to the determination of the application:

## 1. Land Use & Signage

The submitted SEE appears to include a contradictory typo:-

*'Self- Storage Units best suits the use definition for these units, as they will not be solely used for the purposes of storage.'*

The proposed characterisation of the proposed units needs to be clarified as, based on the submitted details, appears to be more likely small *light industrial* units than *self-storage units* (noting both are permissible).

It is additionally queried, if the proposal is for *self-storage units* why these would require any signage, especially at the size proposed.

## 2. Flood Management

The stormwater plans prepared by Eclipse Consulting indicate the proposed buildings floor level will be 4.45m Australian Height Datum (AHD). Surrounding vehicular access and parking areas and associated cut/fill have also been indicated on the stormwater plans.

No objections are raised to the proposed building floor levels and surrounding vehicular access and parking area levels as shown on the Eclipse Stormwater plans.

It is noted that the architectural plans do not detail the proposed floor levels to AHD on the architectural plans for proposed buildings, surrounding vehicular access and parking areas. Revised architectural plans detailing the AHD levels consistent with the stormwater plans by Eclipse Consulting need to be provided.

### **3. Stormwater Management**

The submitted Stormwater Management Plan (SWMP) is insufficient and it is recommended the applicant provide additional or amended details to address the following:

- a) The stormwater discharge is proposed to be connected to the existing service station system. The submitted details do not demonstrate that the service station stormwater infrastructure is adequate to service this new proposal. In this regard, the proposal has not provided any information for the existing service station stormwater infrastructure nor has the submission demonstrated if the entire site catchment is being appropriately managed.
- b) In particular, service stations are required to have specifically designed stormwater catchment with fuel treatment structures for the bowser areas. There are concerns this proposal could directly undermine the existing service station stormwater infrastructure.
- c) Stormwater reuse has not been considered as part of the proposal. There is an opportunity to capture roof water via rainwater tanks and reuse within the development, particularly to proposed toilets and external landscape and washing.
- d) The proposed stormwater detention design is a concern. The use of pipes as a detention system is not supported. The stormwater design needs to be amended to be a self-sufficient design providing for full scale detention/retention, WSUD and stormwater reuse.
- e) The development must be designed to ensure all of its stormwater run-off is fully contained within its portion of the site as any overland flows will directly impact on the existing service station driveway area, hence potentially impact on traffic movement.

### **4. Vehicle Access, Parking and Manoeuvring Management**

#### **TfNSW**

The turning plan and traffic report by SECA Solutions indicates use of 8.8m service vehicles (MRV) as the largest expected vehicle to access the proposed buildings.

The proposed storage buildings will use the existing Shell Service Station driveway on the western side accessed directly from Cormorant Road (which is a State Road) and this driveway is the main entry for the service station for all types of vehicles including fuel delivery trucks (i.e. semi-trailers and heavy rigid vehicles- HRV).

TfNSW recently upgraded Cormorant Road with dual lanes and a speed limit of 80Km/hr applies. Typically, TfNSW requires a deceleration lane for these types of developments and speed zones. It is recommended advice of TfNSW be sought on this proposal in terms of traffic impacts, the historic issues associated with the Cormorant Road driveway access for the site and potential need for a deceleration lane.

### **Safety and Risks**

### Driveway Design/Vehicular Access

It is noted the proposal is designed for a 8.8m long Medium Rigid Vehicle (MRV). Entry to the proposed buildings is via the southern accessway and exit via the northern accessway. It appears this provides for traffic as a one-way operation.

Concern is raised regarding potential vehicular conflict and safety issues due to the proposed southern entry accessway to the proposed self-storage units being in close proximity to the main entry driveway of the service station at the west side of the frontage via Cormorant Road.

Any delays in access at this southern access, such as gate openings and queuing at this gate, will potentially create safety issues on vehicles entering and/or approaching the service station driveway (travelling at 80Km/Hr) due to no available deceleration lane and fast approaching vehicles at the Cormorant Road driveway.

It is recommended the impacts at the Cormorant Road driveway be addressed by redesign of the internal access layout. It is suggested the applicant consider using the proposed northern accessway as the entry and southern accessway as the exit (i.e. reversing the direction of flow). This will allow vehicles accessing this proposal to travel further into the site and any access or delay impacts being minimised. Any amended design must demonstrate suitably clear turning paths that do not impact on the operation of the proposed buildings, the existing service station and overall turning movements external and internal to the site.

### Sightlines & Visibility

It is noted the current Cormorant Road entry driveway has clear unrestricted sightlines when approaching the driveway from the west, therefore any queues at the service station, including the entry driveway, are visible from a long distance.

Proposed fencing and landscaping along the Cormorant Road frontage and part of the western boundary will directly impact sightlines to the service station and its entry which could increase safety risks for traffic along Cormorant Road and entering the site.

It is recommended the design either: -

EITHER

- i) provide further details addressing these safety concerns and demonstrating how these issues are mitigated, or
- ii) be redesigned to minimise impacts on sightline visibility.

### Internal Vehicular Access

The turning diagrams for the proposed self-storage units show a medium rigid vehicle (MRV) can travel through the site but no details have been made for parking of these vehicles. It appears that MRV servicing the site are required to park within the common driveway for unloading and this will impact operation of other units and vehicular access through the site which is not acceptable. Further details are required to address this issue with a redesign likely required.

The submitted details do not address vehicular access to the individual units. The size of the proposed roller doors may facilitate access by larger vehicles therefore turning diagrams (entering/exiting) for the largest vehicles intended to access the proposed individual units need to be provided (which may also address the above concern).

### **Parking**

The documentation indicates 1-2 workers at each unit, resulting in a potential 36 staff for the 18 units. The development proposes 15 car parking spaces which may not be adequate for the proposed use. Concern is raised the proposed on-site car parking is not sufficient and may impact on the site operations and further parking impacts offsite. It is noted the design does not include one dedicated parking space per unit, an issue that could be further exacerbated if the proposed units are Strata-title subdivided.

## **Waste Management**

It is noted waste management is proposed to be via private contractors. The proposal, if subdivided by strata title, would be separately rated under the Business Waste Management Service Charge (BWMS). This would entitle each unit to 1 x 140 general waste bin per week and CN does not support collection of a large number individual bins from the kerb. In this instance, no clear collection methodology of bins has been indicated inclusive of HRV movements.

It is recommended that a bulk waste bin alternative for the site may be an acceptable and that you discuss any potential waste management solutions with David Thomas (Manager Service Delivery - 4974 6046) prior to submitting a revised Waste Management Plan (WMP).

## **5. SEPP (Resilience and Hazards) - Hazardous and Offensive Development**

The proposal has been reviewed and does not include the storage of any dangerous goods, however an assessment of the safety of the proposed development in accordance with SEPP (Resilience and Hazards) addressing the storage of dangerous goods at neighbouring properties to ensure safe operations of the site. While the gas storage at the neighbouring Elgas facility exceeded the initial screening threshold, subsequent hazard analysis determines the societal risk is negligible and the proposal is acceptable. Further assessment against the Hazardous Industry Advisory Paper (HIPAP) No. 10 risk criteria confirmed the risks associated with the Elgas facility do not pose an unacceptable risk to the proposed storage facility and therefore the proposed development is suitable.

These conclusions are made on the basis that no dangerous goods are to be stored within development site itself. The Riskcon SEPP (Resilience and Hazards) assessment report recommends that dangerous goods are not to be stored at the storage facility. It is recommended a condition of consent be imposed such as:-

*During occupation and ongoing use, storage of dangerous goods is prohibited at the premises.*

## **6. Subdivision**

Is the proposal intended to be subdivided via Strata title now or into the future? Considering the nature of the proposed development, the proposal should address possible strata title subdivision to avoid potential issues into the future (e.g. parking as discussed above).

## **7. Contributions**

The subject site is within the Newcastle LGA and is subject to CN's Section 7.12 Development Contributions Plan (2022). It is recommended an appropriate condition of consent is imposed which requires the applicant pay a development contribution to Newcastle City Council. The contribution is required to be 1% of the identified Estimated Development Cost (EDC). It is recommended that an Estimated Development Cost report be submitted to confirm the EDC prior to imposition a condition for these contributions.

## **Conclusion**

Thank you for the opportunity to review the submitted DA. It is requested the above matters be considered and addressed by the application and by the consent authority to ensure the development appropriately responds to each matter and makes a positive contribution to the City.

If you have any questions in relation to the various matters considered in this letter, please contact me on 4974 2768 or by email on [djaeger@ncc.gov.au](mailto:djaeger@ncc.gov.au) .

Yours faithfully

**Damian Jaeger**  
**PRINCIPAL DEVELOPMENT OFFICER (PLANNING)**