5 July 2024

2230528

Bruce Zhang
Senior Environmental Assessment Officer
Department of Planning, Housing and Infrastructure
4 Parramatta Square 12 Darcy Street,
Parramatta NSW 2150

Dear Bruce,

Response to Comments on the Draft Response to Submissions – Edge Estate (SSD-17552047)
141-251 Aldington Road, Kemps Creek

We write on behalf of FPI Developments NSW Pty Ltd ('Frasers Property Industrial' or 'the Applicant') in response to the Department of Planning, Housing and Infrastructure's (DPHI's) comments on the draft Response to Submissions issued via email on 24 May 2024.

The DPHI's test of adequacy (TOA) comments on the draft Response to Submissions and the Applicant's responses are provided in **Table 1**. This letter should be read in conjunction with the final Submissions Report prepared by Ethos Urban (Under Separate Cover) and the following supporting appendices which have either been updated or additionally provided:

- Updated Architectural Drawings prepared by Frasers Property Industrial (**Appendix C**);
- Updated Landscape Drawings prepared by Habit8 (**Appendix D**);
- Updated Civil Drawings prepared by AT&L (**Appendix E**);
- Updated Construction Noise and Vibration Assessment prepared by Acoustic Works (**Appendix I**);
- Updated Operational Noise Assessment prepared by Acoustic Works (**Appendix J**);
- Updated Air Quality Impact Assessment prepared by Northstar (**Appendix K**);
- Traffic and Transport Response prepared Ason Group (**Appendix N**);
- In-Principle support for Eastern Trunk Drainage Channel prepared by Sydney Water (**Appendix V**); and
- Icon Oceania Coordination Letter dated 28 June 2024 (**Appendix W**); and

This letter should also read in conjunction with the following additional information attached to this letter:

- Operational Noise TOA Response prepared by Acoustic Works (**Attachment A**);
- Civil TOA response prepared by AT&L (**Attachment B**);
- Indicative Staging Plan prepared by Frasers Property Industrial (**Attachment C**);
- TfNSW Correspondence dated 21 June 2024 (**Attachment D**).

Should you have any queries in relation to the above, please do not hesitate to contact us or Samantha Wilson (Planning Manager) of Frasers Property Industrial.

Yours sincerely,

Lachlan Jones
Urbanist
ljones@ethosurban.com

Christopher Curtis
Associate Director
ccurtis@ethosurban.com

Table 1 Response to Comments on Draft Response to Submissions

Comment	Applicant Response
Traffic and Access	
Mamre Road Capacity	
1. The Department is in discussion with TfNSW regarding road network capacity issues and the GFA of approved and under-assessment development applications. Please provide consideration of the expected timing of GFA delivery within the site and opportunities to minimise impacts on road network capacity.	Frasers Property Industrial have provided an Indicative Staging Plan for the proposed development included at **Attachment C**. It is emphasised that this is indicative only and subject to change based on market demand and the needs of future tenants. It assumes the delivery of the proposed development will be staggered over a 2.5-year period. The occupation of the first warehouse and distribution centre will not occur until the completion of the Aldington Road, Abbotts Road, and Mamre Road/ Abbotts Road intersection upgrades. In addition, it is understood that other upgrades within the Mamre Road Precinct will occur during this period including the Mamre Road / Bakers Lane Sequence 1B works (approved under SSD-9522), the LOG-North Bakers Lane / Aldington Road works, and Mamre Road Stage 1 (in addition to interim safety upgrades currently being considered by Transport for NSW (TfNSW) and Penrith City Council). The Transport Management & Accessibility Plan (Appendix T of the Amendment Report) provided that there was sufficient capacity for the proposed developments total GFA under the 2026 Interim Arrangement. The assessment was undertaken in accordance with TfNSW approved modelling which was confirmed by TfNSW who did not raise any objections to the Amendment Report due to overall traffic generation.
2. The Traffic and Transport Response (TTR) does not include any mid-block capacity analysis, e.g., of Mamre Road south of Abbotts Road and north of Bakers Lane. Please update the TTR to include a mid-block capacity analysis, taking cumulative traffic into account. The mid-block analysis must include traffic volumes for the AM and PM peaks for the following links: • *The link through Aspect Industrial Estate Access Road 1/Mamre Road intersection into the MRP;* • *The link from the Mamre/Abbotts Road intersection into the precinct;* • *The Mamre Road link, north of Bakers Lane;* • *The Mamre Road link between Bakers Lane and the Aspect Industrial Estate Access Road 1/Mamre Road intersection; and* • *The Mamre Road link between Aspect Industrial Estate Access Road 1/Mamre Road intersection and Abbotts Road.*	The Applicant has consulted further with the DPHI regarding the requirement of a mid-block assessment. The DPHI, following discussions with TfNSW, confirmed that a mid-block assessment is not required for the proposed development via email on 28 June 2024.
Site Access and Road Levels	
3. Council raised that the heavy vehicle access at Lot 3 is too narrow for the manoeuvring of 30 m PBS Level 2 Type B vehicles. The TTR states that the width is appropriate as no trucks would turn right towards the cul-de-sac of Road 2. This cul-de-sac will be removed	The heavy vehicle driveway along Road No.2 (north-south road) is entry only, with heavy vehicles to exit via dedicated exit on Road No.3 as illustrated on the updated Architectural Drawings (**Appendix C** of the Submissions Report). The swept path drawings included as part of the Transport and Traffic Response (**Appendix N** of the Submissions Report)

to connect to the Dexus development, after which trucks may turn right from Lot 3. Please amend the driveway width to accommodate all required manoeuvres.	demonstrate that the proposed driveways are suitable for 30m A-Double entering Lot 3 via Road No.2 and exiting the Lot 3 via Road No.3.
4. TfNSW did not support access to Lots 6, 7, and 8 directly from the Collector Road. The TTR states that TfNSW was referring to the operation of the signalised intersection with Aldington Road, but this interpretation is not substantiated by evidence of consultation with TfNSW. Please provide evidence of consultation or further analysis to show that these access arrangements can safely operate.	The Applicant has since undertaken further consultation with TfNSW who provided that: • The comment in relation to the light vehicle access to Lot 6 is no longer valid with it provided via the local industrial road; and • The light vehicle access to Lot 7 and 8 would be supportable if the Lot 7 development was mirrored and a single combined access driveway was created or (if not possible) a central median strip is to be constructed between the roundabout and Aldington Road intersection enforcing a left out arrangement. Correspondence with TfNSW is provided at **Attachment D** for reference. The Applicant has explored the recommendation of TfNSW to mirror the Lot 7 design. However, this results in a suboptimal warehouse and loading arrangement and would require the consolidation of heavy and light vehicle access points, which will not be supported by Penrith City Council. Therefore, median strips along the centre of the Collector Road between the roundabout and Aldington Road intersection have been included to enforce the left-in/left-out arrangement for Lots 7 and 8. The updated Civil Drawings (**Appendix E** of the Submissions Report) have been updated to incorporate median strips along the centre of the Collector Road.
5. The levels of the collector road do not appear to be coordinated between Access Logistics Park and the Edge Estate at the site's western boundary, as the inclines of these roads do not match at the boundary (see below).  	As outlined in the Civil TOA Response (**Attachment B**), the levels of the road have been coordinated and matched to the Access Logistics Estate to the west. AT&L and Costin Roe Consulting are working together and satisfied that the works align which is expected to continue through the detailed design phase for each project. Refer 20-776-C1055 of the updated Civil Drawings (**Appendix E** of the Submissions Report) for the subject long section. AT&L are unaware of the levels shown in the long section provided as part of the comments as this does not reflect the current design.
6. Temporary turning heads are proposed at each end of Road 2, 20 m short of the boundaries, with the Dexus development to the north and the Icon Oceania development to the south. However, connections between sites are ultimately required to deliver the MRP DCP road network. Please provide details of the proposed timing, responsibilities and delivery mechanisms for removing the turning heads and connecting to the adjoining lots. This should be supported by evidence of consultation and any agreements with the landowners.	It is widely expected that the neighbouring development to the north (SSD-32722834) and south (SSD-23480429) will be delivered following the proposed development as these SSDAs were lodged after Edge Estate and are at earlier phases in the assessment process. As such, it cannot be Frasers Property Industrial's responsibility to coordinate and deliver the ultimate connections to the adjoining sites. It is expected that a similar condition to that included within the Development Consent of the Access Logistics Park (SSD-17647189) would be included within the Development

Consents for the neighbouring development to the north (SSD-32722834) and south (SSD-23480429) which is as follows:

Internal Access Roads

B14. Prior to the commencement of construction works (excluding earthworks), the Applicant must:

(a) prepare a detailed design of the access roads (Access Roads 1, 2 and 3) including the roundabout shown in Figure 4 in Appendix 1 in accordance with the design requirements in the MRP DCP to the satisfaction of Council; and

(b) consult with Council concerning the processes for dedication of the lands for the access roads including the roundabout shown in Figure 4 in Appendix 1.

7. Clarify how the proposed single access point to the dedicated freight corridor within Lot 2 will enable access for the rest of the development and how the proposed design supports the objectives of section 3.4.2 of the MRP DCP and the functioning of this corridor.

As outlined in the Civil TOA Response (**Attachment B**), Section 3.4.2(5) of the MRP DCP states, *"Development applications for lots with an identified access point (refer Figure 17) shall demonstrate how access to and from the dedicated freight corridor will be achieved."*

The section of the dedicated freight road to the south of Road No.1 (located on the Access Logistics Estate) has been excluded from the reference design after consultation with TfNSW (refer to **Figure 1**). As a result, a single access point to the site is identified by the MRP DCP (refer to **Figure 1**). The Applicant has provided the subject access point from Lot 2 to the dedicated freight corridor and therefore complies with the controls and objectives of the MRP DCP. Furthermore, TfNSW have endorsed the "Functional Layout design" which is consistent with the provided dedicated freight road civil drawings.

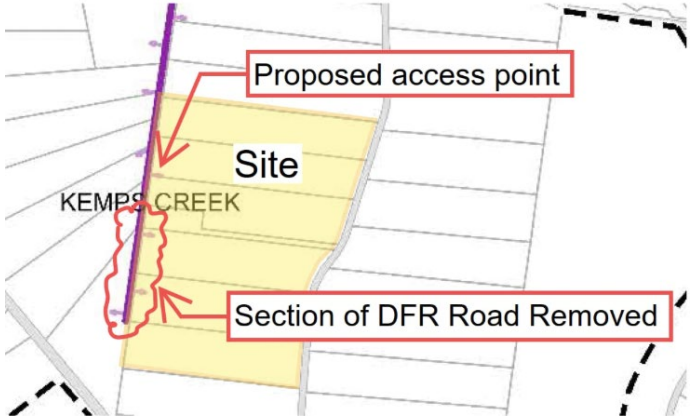


Figure 1 Dedicated Freight Road Annotated Drawing

Source: AT&L

Air Quality

1. The Department has received advice from an independent air quality expert, which identified shortcomings in air quality assessments in the MRP. Please address the following points in a revised AQIA:

- *For large bulk earthworks construction projects such as those in the Mamre Road Precinct, there are likely to be some off-site particulate impacts from time to time. The development is estimated to be handling/moving nearly 6 million tonnes of material. It is, therefore, important to manage this risk and mitigate emissions at the source where possible.*
- *Notwithstanding the IAQM method can be used to determine the mitigation measures; many of these measures are difficult to model and are based on continual management of day-to-day operations.*
- *Monitoring particulate matter leaving the site boundary and potentially impacting nearby receptors is an important part of air quality mitigation measures for the development. High-level modelling is required to understand the local dispersion patterns and determine the most suitable upwind and downwind monitoring locations. The difference between the upwind and downwind monitors allows the calculation of the site contribution.*
- *As part of the high-level modelling, an inventory of emission sources is required. The inventory must include emissions from the bulk earthworks activities and the mitigation measures that can be incorporated into modelling.*

The installed monitors should be continuous and real-time, with the ability to send alerts to site operators to address any elevated levels-this would feed into the TARP (trigger action response plan). The monitors should also include wind speed and wind direction sensors (also in real-time) to enable analysis of where particulate matter was coming from during periods of high concentration.

An updated Air Quality Impact Assessment has been prepared by Northstar Air Quality (**Appendix K** of the Submissions Report). Northstar Air Quality have been in consultation with the DPHI's independent air quality expert and have updated the Air Quality Impact Assessment accordingly.

The updated Air Quality Impact Assessment includes a high-level dispersion model which has been performed to identify the most appropriate locations for air quality monitoring during the construction phase. It includes:

- An updated discussion around the potential cumulative impacts during the construction phase (Section 4.5);
- Identification of the requirements for construction phase monitoring (Section 6.3); and
- Discussion of the construction phase modelling undertaken with the identification of appropriate monitoring locations (Section 9.3).

The updated Air Quality Impact Assessment outlines that, given the significant number of identified developments surrounding the proposed development, there is potential for construction phase emissions to result in cumulative impacts at proximate sensitive receptors.

As required by the DPHI, a high-level modelling exercise has been performed to determine suitable monitoring locations to allow for proactive management of construction dust emissions. Northstar Air Quality highlights that it is important to note that this modelling exercise does not include an assessment of compliance with the NSW EPA impact assessment criteria, rather it has been performed to identify the likely dispersion of potential emissions resulting from the construction phase of the proposed development.

Given the proposed construction timeframes, two scenarios have been assessed, which essentially covers the progression of earthworks over a period of a year, as:

- Scenario 1: February to July; and
- Scenario 2: August to December.

Emissions associated with earthworks (excavators, loading to haulage trucks, unloading), and haulage have been assessed. It has been assumed that the entire area is subject to wind erosion. The dispersion of particulate matter emissions generated from the proposed earthworks was examined as part of the modelling exercise using CALPUFF in 2-dimensional (2-D) mode.

The predicted dispersion of particulate matter emissions for Scenario 1 and 2 is provided in **Figure 2** and **Figure 3** respectively.

In summary, construction particulate matter emissions are predicted to travel and be more concentrated along the western boundary of the site and it is considered that real-time monitoring should be performed towards that location to allow calculation of downwind impacts along that boundary.

As such, Northstar Air Quality has recommended real-time monitors be positioned on the western as well as the eastern boundary to inform the Trigger Action Response Plan (TARP).

The monitors should be located centrally on the western and eastern boundaries in Scenario 1 and moved south in Scenario 2.

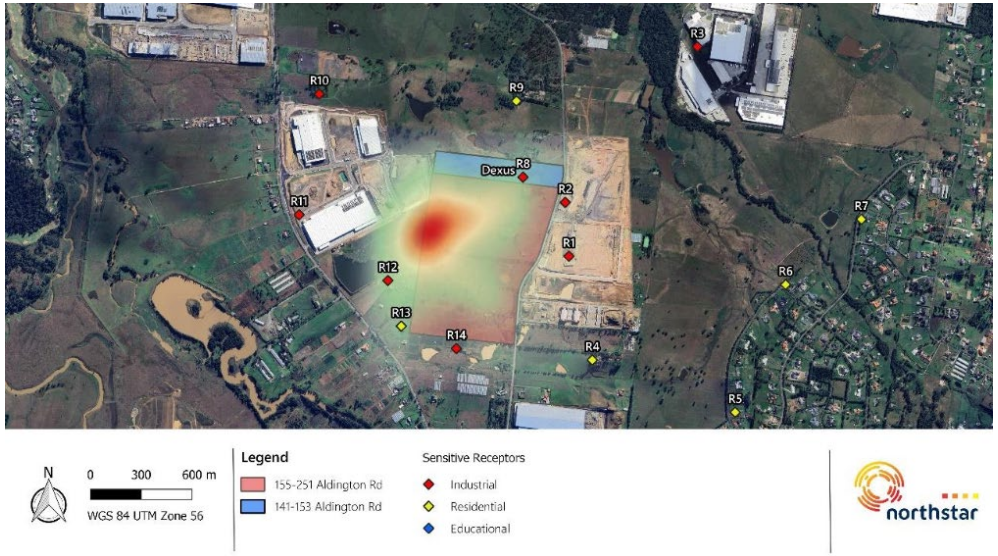


Figure 2 Predicted dispersion of construction particulate emissions – Scenario 1

Source: Northstar Air Quality

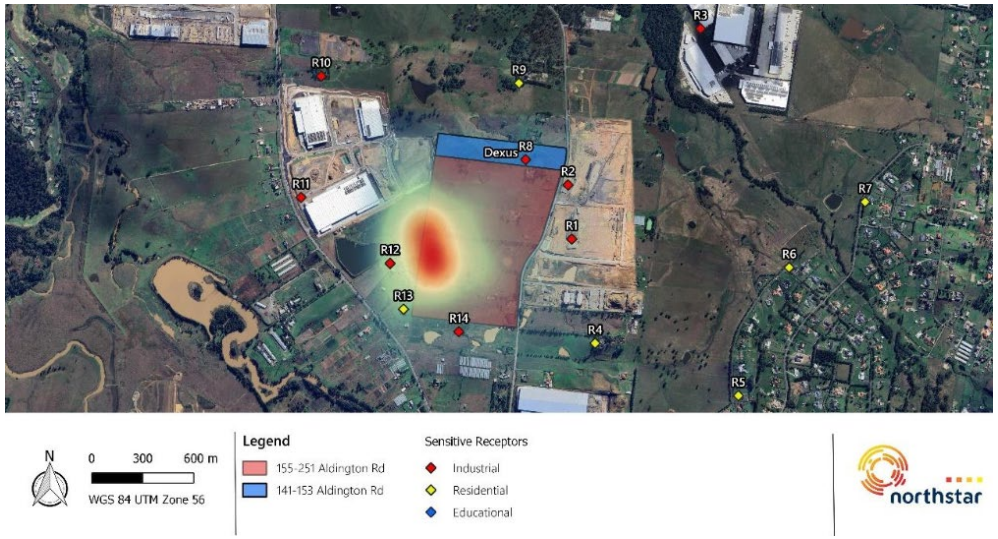
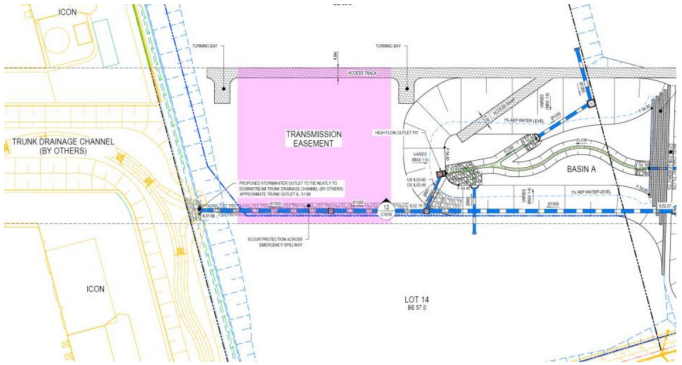


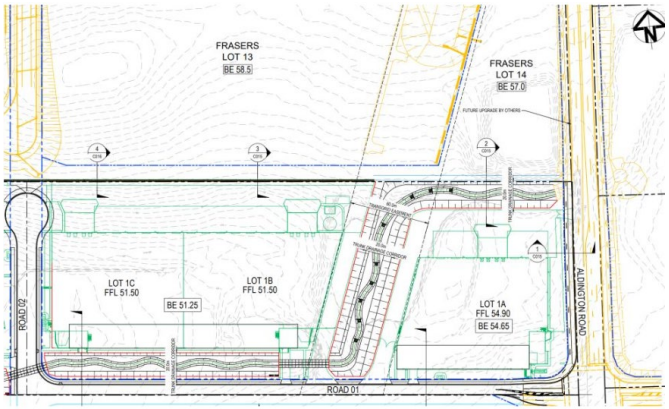
Figure 3 Predicted dispersion of construction particulate emissions – Scenario 2

Source: Northstar Air Quality

The construction phase monitoring program and associated TARP will be detailed in the Construction Environmental Management Plan (CEMP) and Construction Air Quality Monitoring Plan (CAQMP).

Given the assessment completed and taking into consideration the minor incremental contribution of the proposed to air quality impacts in the surrounding area, no air quality monitoring is required or proposed, for the operational phase of the development. For further information refer to the Updated Air Quality Impact Assessment (**Appendix K** of the Submissions Report).

Stormwater Management and Flooding Impact	
1. The stormwater outlet and receiving infrastructure shown in the Civil Drawings (Nos 20-776- Cl071, 20-776-C1082} appear inconsistent with drawings for the Westgate Kemps Creek development (i.e. part of the trunk drainage}. Please confirm that the proposed discharge is compatible with the proposed Westgate development plans .  *Frasers' Civil Drawing (No 20-776-C1071)*	As outlined in the Civil TOA Response (**Attachment B**), the updated Civil Drawings (**Appendix E** of the Submissions Report) includes a revised outlet arrangement at the boundary with the adjacent Icon Oceania site. Icon Oceania are currently responding to the submissions received following the exhibition of the Environmental Impact Statement for SSD-23480429. Frasers Property Industrial and Icon Oceania have been and will continue to coordinate design and delivery programmes, including any interim arrangements that may be required based on timing of approvals and construction. A Coordination Letter from Icon Oceania to Frasers Property Industrial is provided at **Appendix W** of the Submissions Report as evidence.



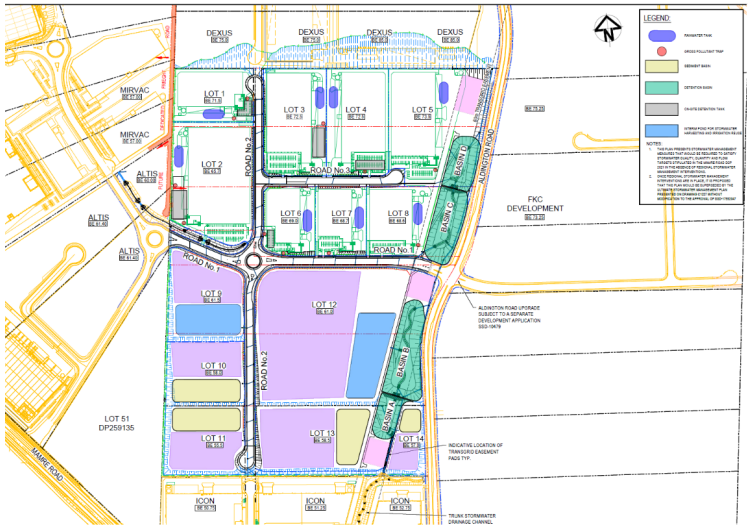
Westgate Proposal (Civil Plan no 21-860-C004)

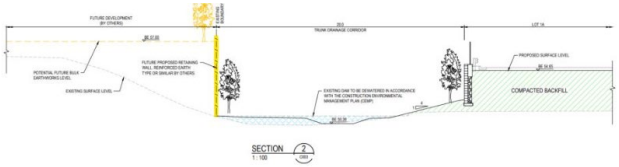
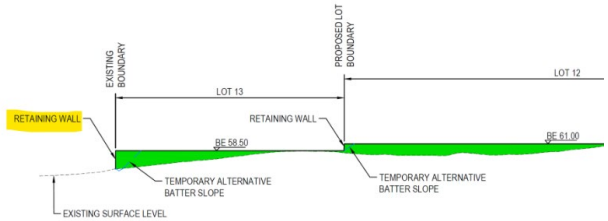
2. *Should the Edge Estate precede Westgate, the Civil Response provides that 'an interim outlet arrangement incorporating a tailout into the existing farm dam would be required. This detail would be subject to further coordination between Frasers and Icon Oceania'. Please include details of the interim tailout, including civil drawings and Icon Oceania's agreement to allow water to be discharged into the existing farm dam in its landholding.*

Frasers Property Industrial and Icon Oceania have and will continue to coordinate key civil design aspects. A Coordination Letter has been prepared by Icon Oceania (**Appendix W** of the Submissions Report) that provides evidence of the ongoing commitment between the landowners to provide the practical interim and ultimate engineered solutions.

3. *The Civil Drawing (No C014021.00-CH2) for Access Logistics Estate included in the trunk drainage design prepared by Costin Roe (Attachment 3 of Appendix K) shows an interim open trunk drainage in the proposed Lot 2 (see below). However, the Civil Drawings for the Edge Estate do not show an interim trunk drainage at this location. Please clarify if an interim drainage is proposed, and the timing and any trigger for removal.*

As outlined in the Civil TOA Response (**Attachment B**), the Interim channel has been allowed for by Costin Roe Consulting to cater for the overland flow from the existing dam on the Edge Estate site. As part of the proposed earthworks on the Edge Estate site, temporary drains and swales will be constructed by the contractor as the works progress and the dam is dewatered and filled. The drain constructed, subject to timing, by Barings will be not required once works commence and will be removed.

4. *Please clarify the purpose of the areas highlighted in purple in Lots 9 to 14 in Phase 2.* 	As outlined in the Civil TOA Response (**Attachment B**), the purple hatched areas nominate irrigation areas from the proposed interim sediment basins. The updated Civil Drawings (**Appendix E** of the Submissions Report) has updated 20-776-C1126 to clarify this.
5. *The Water and Stormwater Management Plan and Erosion and Sediment Control Plan (ESCP) both identify that the site contains saline and sodic soils. Please clarify how these findings have been factored into the development design, including stormwater and erosion and sediment control measures.*	As outlined in the Civil TOA Response (**Attachment B**), Section 4.4 of the updated Erosion and Sediment Control Plan (**Appendix H** of the Submissions Report) describes general dispersive soil management requirements. The management of saline soils will primarily be preventing, or at least minimising, infiltration of surface water runoff across the site. This will involve (as a minimum): • Suitable compaction and amelioration of the subgrade of the proposed OSD basins. If required, some form of liner (e.g., compacted clay with gypsum treatment) would be incorporated, subject to detailed geotechnical investigation within the footprint of the proposed OSD basins; and • Provision of adequate surface drainage, in particular within pervious (landscaped) areas, to prevent ponding and minimise the risk of infiltration.
6. *Confirm that the measures proposed in the ESCP will achieve the construction phase targets in Table 5 of the MRP DCP.*	As outlined in the Civil TOA Response (**Attachment B**), the measures proposed in the updated Erosion and Sediment Control Plan (**Appendix H** of the Submissions Report) will achieve the construction phase targets in Table 5 of the MRP DCP. Refer to Table 1 of the Updated Erosion and Sediment Control Plan which confirms the proposed erosion and sediment control measures will achieve the construction phase stormwater quality targets.
7. *The ESCP drawings (20-776-C1201, 1202 and 1203) indicate that some lots will utilise the OSD basins as sediment basins. Clarify how erosion and sediment control measures will be implemented for undeveloped lots (including Lots 12-14) once the basins and trunk drainage are operational.*	As outlined in the Civil TOA Response (**Attachment B**), the updated Civil Drawings (**Appendix E** of the Submissions Report) and updated Erosion and Sediment Control Plan (**Appendix H** of the Submissions Report) clarify the requirements for sediment basins on undeveloped lots (9-14) once OSD basins and trunk drainage are in their final operational form. The undeveloped lots will require either full stabilisation or implementation of a

	sediment basin to mitigate potential impacts of erosion and sedimentation. We have provided a much clearer set of erosion and sediment control plans which provide further clarity of the design.
Bulk Earthworks and Retaining Walls	
1. *The Department notes a retaining wall of approximately 7 m high is proposed between the finished pad levels at Lots 13 and 14 and the Westgate Kemps Creek development to the south (see below). The retaining wall does not comply with control 17 in Section 2.4 of the MRP DCP requiring 'high vertical walls and steep batters shall be avoided .... retaining walls shall not exceed 2.0 m in cumulative height'. Additionally, retaining walls must be set back at least 2.0 m from the property boundary in accordance with Section 4.4.1 of the MRP DCP. Please provide a revised design that complies with the MRP DCP.*   	The subject retaining wall is approximately 5m high. Refer to 20-776-C1082 and 20-776-C1086 (Retaining Wall MW05) of the updated Civil Drawings (**Appendix E** of the Submissions Report). The retaining wall along the southern boundary directly interfaces with the trunk drainage channel located on the Icon Oceania site which forms part of the regional stormwater network. The design for the subject trunk drainage channel has received in-principle support from Sydney Water (refer to **Appendix V** of the Submissions Report). The trunk drainage channel includes landscaping that will screen the proposed retaining wall with landscaping to be planted at the top of the wall (within development lots) in accordance with the MRP DCP as part of the future development.
2. *The Civil Response states that 'detailed design of the retaining walls between the trunk drainage channel and Lot 2 will continue to be developed in consultation with Sydney Water and will ensure compliance with the DCP controls for retaining walls'. Please provide detailed design of the retaining wall as part of the RtS considering bulk earthwork of Lot 2 forms part of the proposed development.*	As outlined in the Civil TOA Response (**Attachment B**), AT&L and Barings are working with Sydney Water to finalise the design of the open Trunk Drainage Channel. As part of this revised design (refer to **Figure 4**), Lot 2 has been lowered which will further reduce the retaining wall along the northern side of the channel. The wall adjacent to Lot 2 is compliant with the MRP DCP.

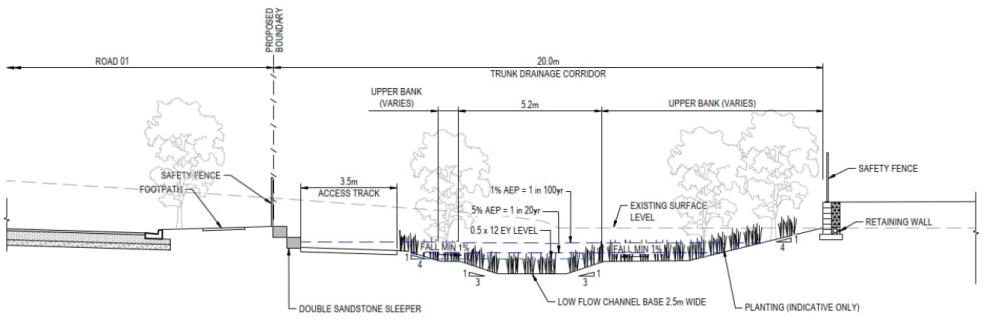
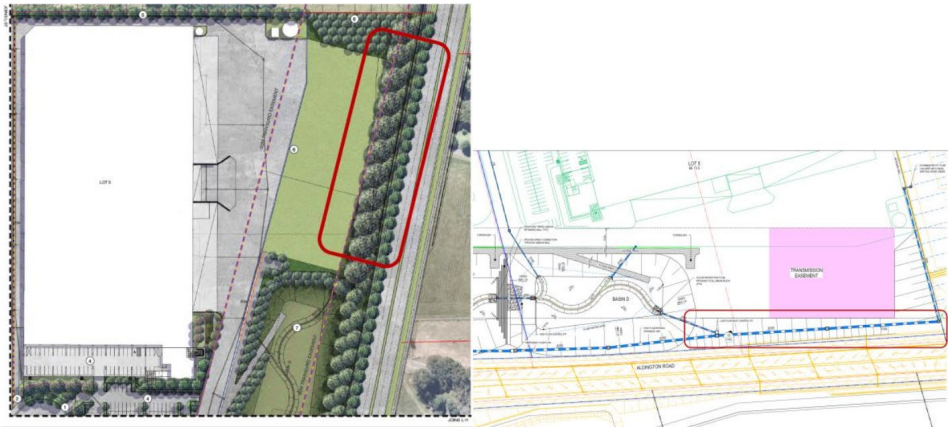


Figure 4 Revised Trunk Drainage Channel Design

Source: AT&L

3. The Department has engaged independent expert advice regarding the constraints and opportunities for responding to site topography and minimising earthworks. This advice will be forwarded separately.	It is noted that a summary of the advice prepared by IDC was provided by the DPHI via email on 13 June 2024. The advice received and Applicant's response is provided below.
The Department requests you to address the following IDC's recommendations in the RtS report. These comments are in addition to comments on the draft RtS provided before:	The following comments and responses have been incorporated into the Submissions Report.
• *Lower Lots 1 and 2 pad levels to minimise the retaining wall heights abutting Aspect Industrial Estate and Access Logistics Park.*	In response, the pad level for Lot 1 has been lowered by 3 metres from BE 71.50 to BE 68.5 and Lot 2 has been reduced by 1.2m from BE 65.7 to BE 64.5 to better respond the development to the west and minimise the height of retaining walls. Refer to the updated Civil Drawings (**Appendix E** of the Submissions Report).
• *Lower Lot 3 pad level to more evenly distribute the level differences of the proposed building pads along the northern side of Road 3.*	The pad level for Lot 3 remains unchanged as it cannot be lowered due to the consistency with the pad levels of Lots 4 and 5 to the immediate east.
• *Reduce retaining walls with the increase of batter widths and setbacks.*	The retaining walls have been reviewed and adjusted where possible to maximise batters in the landscape setbacks. Refer to the updated Civil Drawings (**Appendix E** of the Submissions Report).
Noise Impact	
Operational Noise Impact	
1. The amended NIA contains some itemised noise sources in Section 8 however these are limited to traffic-related noise sources such as light and heavy vehicles and forklift movements. As previously requested, please provide a complete itemised list of noise sources to ensure risks are quantitatively assessed. Noise sources should be categorised to show all contributions from:	A Noise TOA Response has been prepared by Acoustic Works and included at **Attachment A** of this letter. Acoustic Works identify that the comment appears to request two things, being; an itemised list of noise sources (relevant to the assumptions made in the noise model); and the contributions of noise sources (relevant to the results of the noise modelling).

(a} Outdoor mechanical plant; *(b) Breakout noise from warehouse buildings;* *(c) Heavy vehicle noise from uncovered hardstand areas and estate roads;* *(d) Heavy vehicle noise from covered hardstand areas (below super awnings);* *(e) Loading dock operational noise from covered hardstand areas (below super awnings); and* *(f) Light vehicle noise.*	The noise model covers everything that was itemised in the DPHI comments. The Updated Operational Noise Assessment (**Appendix J** of the Submissions Report) also already states all the mentioned noise sources. The DPHI should note that the noise source of a vehicle does not change if located under an awning or not located under an awning. SoundPLAN considers reflections from building surfaces (such as awnings) when calculating the propagation of the noise source. The Updated Operational Noise Assessment now shows the contribution of all noise sources at the receiver locations at Section 14.3. Breakout noise would be the contribution from any source labelled as "Warehouse transmissive area". It also includes the items in the sleep disturbance assessment.
2. The Noise Response Letter dated 13 March 2024 advises that 'trucks on steeper slopes were based on noise levels for semi-trailer acceleration/deceleration on ramps. These noise levels have now been included in the Itemised Noise Sources table (Table 20)' (emphasis added). Please clarify if the sound power level assumptions for heavy trucks have been adjusted to reflect the proportion of A-doubles identified in Appendix A of the TMAP.	As outlined by the Noise TOA Response (**Attachment A**), the noise levels were based on an A-Double heavy vehicle. The revised Operational Noise Assessment (**Appendix J** of the Submissions Report) has been updated accordingly.
Construction Noise Impact	
3. The Noise Response Letter dated 13 March 2024 states: *Cumulative construction noise impacts are not required under the Interim Guideline for Construction Noise. The Department should note that constructions works have less stringent requirements than continued/ongoing operation of a site due to constructions works being temporary. Additionally, timing of the construction of surrounding developments and this development would be highly speculative and cannot be done accurately.* *As previously requested, please provide an assessment of cumulative construction noise with regard to likely concurrent activity occurring on other sites with the MRP. Include outcomes of consultation with nearby landowners regarding construction timeframes, details of the proposed construction timeframes, and a framework for managing cumulative impacts and construction fatigue.*	As outlined in Section 9.3 of the updated Construction and Vibration Impact Assessment (**Appendix I** of the Submissions Report), there is the potential for a sensitive receiver to be affected by cumulative noise impacts from multiple construction sites in the vicinity of the proposed development. The construction schedule and equipment/machinery used on other sites in the vicinity of the proposed development is unknown and an assessment of cumulative construction noise impacts would be highly speculative and cannot be done accurately. If the worst case construction noise impacts from another site occurred at the same time as this proposal at a similar distance to a sensitive receiver, then the cumulative construction noise impacts would increase by up to 3dB(A) (assuming the same construction methodology as this proposed development). It's highly unlikely that the worst-case scenario from two or more construction sites would occur simultaneously. An increase of 3dB(A) from cumulative construction noise impacts would not affect the recommendations provided in this management plan. Earthworks and construction noise impacts presented in Sections 9.1 and 9.2 of the updated Construction and Vibration Impact Assessment are approximately 19dB(A) below the highly noise affected limit of 75dB(A). For cumulative construction noise impacts to exceed this limit, the worst case scenario from 90 construction sites would have to occur simultaneously, assuming that each of these 90 construction sites have the same distance, screening and ground absorption to a sensitive receiver as the proposal. Note there are not 90 construction sites (proposed or current) in proximity to any of the sensitive receivers nominated in Section 6.1 of the updated Construction and Vibration Impact Assessment.

	Therefore, cumulative construction noise impacts are not predicted to significantly impact the results presented in Sections 9.1 and 9.2 of the updated Construction and Vibration Impact Assessment and no additional treatment/management plans would be required to address cumulative construction noise impacts. Further, it is expected that the Applicant will also be required to be part of the Mamre Road Precinct Working Group which is tasked with coordinating construction activities to reduce impacts on surrounding sensitive receivers.
Urban Design and Landscaping	
1. *The Department notes landscaping including large canopy trees is proposed along the site's Aldington Road frontage (see below). However, a stormwater drainage pipe with a diameter of 1.5 mis proposed at the same location (see below). Please confirm if the proposed landscaping is compatible with the drainage pipe.* 	As outlined in the Civil TOA Response (**Attachment B**), the proposed trunk drainage pipe is generally very deep with an average cover of approximately greater than 2.5m deep. Therefore the proposed trunk drainage pipe will not impact on the root system as it will be beyond the root zone. Further detailed coordination will be undertaken between civil (stormwater) and landscape design to ensure the types of vegetation proposed within the Transgrid easement and adjacent to Aldington Road are compatible with the proposed trunk diversion pipe.
2. *The landscape package shows that Lots 4 and 7 do not comply with landscaping controls in Clause 4.2.3 (1) and (4) of the MRP DCP. Please detail the areas relied on for tree canopy and landscape calculations per lot (in GFA) in a plan form. Please note the Department does not support the inclusion of basins as 'deep soil, 100% permeability' for landscape calculations.*	The revised Landscape Drawings (**Appendix D** of the Submissions Report) include a breakdown of tree canopy coverage per lot which is summarised in the below table. All developable lots comply with Clause 4.2.3(1) of the MRP DCP with the exception of Lot 4. This variation is considered acceptable given the developable lots significantly exceed the 10% requirement overall (14.7%) and the tree canopy on Lot 4 is concentrated along the site frontage to the public domain screening the hardstand area and providing amenity to the ancillary office space. The revised Architectural Drawings (**Appendix C** of the Submissions Report) provide a breakdown of permeable area per lot, which is also summarised in the below table. Half of the developable lots comply with Clause 4.2.3(4) of the MRP DCP with Lots 1, 3, 4 and 7 below the 15% requirement. However, overall the developable lots significantly exceed the 15% requirement with an average permeable area of 20.3%.

The tree canopy coverage and permeable area are concentrated along the Transgrid easement in the eastern portion of the site. This enables the effective screening of the development from the to be upgraded Aldington Road as illustrated in the Landscape CGI's (**Appendix D** of the Submissions Report). It is also noted that the application of estate-wide calculation has been adopted for the approved 200 Aldington Road Estate (SSD-10479) and Westlink Industrial Estate – Stage 1 (SSD-9138102).

Lot	Tree Canopy Coverage	Permeability
Lot 1	15.9%	9.5%
Lot 2	15.1%	15.4%
Lot 3	11.6%	10.5%
Lot 4	7.3%	6.5%
Lot 5	17.5%	34.9%
Lot 6	15.2%	15.9%
Lot 7	10.8%	13.1%
Lot 8	17.5%	39.8%
Average	**14.7%**	**20.3%**

The application of Deep Soil (100% permeability) as per the revised Architectural Drawings (DA-A104) is consistent with other approved calculations within the Mamre Road Precinct including the Westlink Industrial Estate Stage 1 (SSD-9138102). As updated, the permeable area for the Edge Estate is 20.3% and therefore complies with the MRP DCP.

3. *The landscape package relies on plans for the adjoining Access Logistics development (SSD17647189) that are inconsistent with the approved plans, including the landscape masterplan and section 6A-6A. Please clarify the reason for this inconsistency.*	The updated Landscape Drawings (**Appendix D** of the Submissions Report) has been updated to remove the reference to a future layout and showed the profile as per the current civil sections.
4. *Confirm if the proposed landscaping can be achieved with regard to sufficient dimensions of deep soil in locations adjoining retaining walls and hardstands and with regard to compacted backfill identified in the civil plans. In addition, confirm that the proposed landscaping along the northern site boundary is achievable given the high retaining walls proposed on the Dexus site and the lack of solar access (see Landscape section 1-1, Page L24 of Appendix D1).*	Habit8 have confirmed that backfill will be structural fill suitable for retaining walls with planting soil mix above. The updated Landscape Drawings (**Appendix D** of the Submissions Report) includes details regarding soil depths within the provided the section drawings. Further, Habit8 confirms that the landscape area is suitable and achievable, and will receive sunlight in the morning and afternoon which is suitable having regard to the species selected which are also noted to be resilient.

5. Increased landscaping and tree canopy cover areas are recommended between Lots 3 and 4, 4 and 5, 6 and 7, and 7 and 8 to break up large areas of hardstands and provide improved shading of these areas.	The hardstand areas are functional spaces that will be used by heavy vehicles and machines. The introduction of canopy trees would conflict with heavy vehicle movements and be difficult to maintain given the safety hazard and interruption to operation that would occur. The proposed warehouses comprises 'super awnings' 20m in width that extend along the length of the loading docks which cover a significant portion of the hardstand area. As outlined above, the proposed development complies with the 10% tree canopy coverage requirement of the MRP DCP across the estate level providing landscaping and tree canopy to the public domain. The hardstand areas are environments designed for heavy vehicles and machinery, not people. The landscaping for the development has been focused along the frontages to each lot that will provide amenity to people in the public domain, car parking and office space.
6. Confirm whether all landscaping shown in the landscape masterplan (page LOS in Appendix D1) will be delivered as part of this development application and provide a staging plan for the landscaping if it is proposed to be delivered in stages.	The landscaping shown on the Landscape Masterplan will be delivered under this SSDA. This includes the delivery of landscaping along the internal road network, along Aldington Road and within the regional stormwater infrastructure locations. The delivery of on-lot landscaping will be delivered in-line with the staged delivery of the built form. Refer to the Landscape Masterplan (LO-5) within the revised Landscape Drawings (**Appendix D** of the Submissions Report).
Architectural Plans	
1. It is noted that the architectural plans identify the use of permeable paving for the fire access roads for Lots 1, 4, 5, 7 and 8. However, the civil plans (eg drawing no. 20-776-C1312) identify these areas as flexible pavement. Please clarify what surface is proposed, and if permeable paving is to be used, provide detail that confirms the paving is suitable to withstand use by heavy vehicles.	The revised Architectural Drawings (**Appendix C** of the Submissions Report) have been updated to remove all permeable pavers. This has been reflected on the Permeable Area Plan (DA-A104)
2. The permeable area plan (drawing no. SP1-ES-DA- A104) identifies the trunk drainage and detention basins as deep soil (100% permeability). However, it is noted that these areas include retaining wall/weirs, pits, pipes, scour protection etc. Provide a more detailed consideration of what areas can be classified as deep soil (one metre or more in depth, connected subsoil).	The Permeable Area Plan included within the Architectural Drawings (**Appendix C**) has been updated to remove the stormwater basin access tracks and the Lot 2 car park entry/exit from the permeability calculations. The application of Deep Soil (100% permeability) is consistent with other approved calculations within the Mamre Road Precinct including the Westlink Industrial Estate Stage 1 (SSD-9138102). As updated, the permeable area for the Edge Estate is 20.3% and therefore complies with the MRP DCP.
3. Confirm that each warehouse is provided with communal areas in accordance with Section 4.2.4 of the MRP DCP and that these areas receive a minimum of 2 hours direct sunlight between 11am and 3pm on the 21st of June.	Each warehouse is provided with a communal space that is illustrated on the updated Architectural Drawings (**Appendix C** of the Submissions Report) which complies with Section 4.2.4(1-4) of the MRP DCP. In addition, each warehouse provides a minimum of 2 hours direct sunlight between 11am and 3pm on 21 of June in accordance with Section 4.2.4(5) of the MRP DCP with the exception of Warehouse 1. Refer to the Shadow Diagrams provided for each individual warehouse on the updated Architectural Drawings. The Applicant has reconfigured the communal open space for Warehouse 1 from the south of the ancillary office to the east to provide better solar access. As illustrated on the updated

Architectural Drawings (SP1-ES-DA- B101), the Warehouse 1 communal space receives direct sunlight between 10am and 12pm on 21 of June. Direct sunlight on 21 of June after 12pm is not possible given the orientation of Warehouse 1.

4. Given the uncertain timing for the connection of Road 2 to the Dexus site, the warehouse on Lot 1 should be designed to provide the required number of car parking spaces in accordance with the MRP DCP, even while the temporary turning head is in place.

The provision of additional car parking spaces on Lot 1 in the interim would require the decrease of GFA on the site, unnecessarily restricting the future operating potential of the site. In the interim, the Applicant proposes the number of staff be restricted on Lot 1 in accordance with the staff parking rates in the MRP DCP.

In accordance with Section 4.6.1 of the MRP DCP, the interim parking arrangement provides parking for 104 staff in relation to warehouse parking, while the ultimate parking arrangement meets the parking requirement of the MRP DCP (refer to below table). The Applicant therefore proposes that the number of staff is conditioned to a maximum of 104 until the ultimate parking arrangement is delivered.

MRP DCP Control	Parking Required	Provided Spaces (Interim)	Provided Spaces (Ultimate)
Warehouses or distribution centres • 1 space per 300m^2 of gross floor area; or • 1 space per 4 employees, whichever is the greater.	39 spaces	26 spaces = 104 staff	55 spaces = 220 staff
Ancillary office space • 1 space per 40m^2 of gross floor area	15 spaces	15 spaces	15 spaces
Total	**54 spaces**	**41 spaces**	**70 spaces**

5. Identify on the architectural plans the heights of proposed buildings from the existing ground level in accordance with section 4.2.1 of the MRP DCP.

Refer to the Building Heights Plan (SP1-AE-DA-A106) included within the updated Architectural Drawings (**Appendix C** of the Submissions Report). It illustrates exceedances on Lot 2, Lot 3 and Lot 6 with 28.7%, 12.6% and 71.6% of the built form 20m above the existing ground level respectively.

Section 4.2.1(2) of the MRP DCP includes a height control based on existing ground levels. The existing ground levels on the site and across the wider Mamre Road Precinct are undulating with significant changes in elevation between peaks (high points) and farm dams (lows points). In order to enable the creation of large flat building pads that support large in-demand industrial buildings, significant cut and fill is required.

The western portion of the site (location of future Lot 2) includes a large farm dam with a significant slope from the west which results in a large amount of fill to be placed in this

	portion of the site. The civil design has sought to achieve compliance with other MRP DCP controls relating to equal cut and fill balance and retaining walls. The civil design has been tested numerous times to ensure the most efficient design is being proposed which we understand was generally supported by IDC's review of the civil design. It is noted that Section 4.2.1(2) of the MRP DCP has been previously varied for similar reasons as above, most notably the Westlink Industrial Estate – Stage 1 (SSD-9138102). Further, the proposed development is consistent with the objectives of Section 4.2.1 of the MRP DCP in that: • It responds to the topography of the site, while providing development at a size and scale the market desires and achieving an equal cut and fill balance. This has enabled an appropriate development layout and built form positioned to the street. The proposed use of undercroft car parking is an example of effective and suitable built form response that minimises the need for retaining walls. • It will not impact on adjoining views to residential areas. • It will retain views from the public domain by the creation of staggered building pad levels and clear north-south / east-west road corridors noting that the site is not located in close proximity to low-lying rural landscapes, native vegetation and riparian lands. • It minimises the impact of buildings upon the surrounding public realm through the positioning of ancillary office space to the most prominent frontage of each lot. The layout of the proposed development has positioned regional stormwater infrastructure and landscaping at key points within the site that will address the public realm.
6. The signage plan (drawing no. SP1-AE-DA-A 105) proposes more than one illuminated sign per elevation on some warehouses, which does not comply with control 9 in section 4.2.8 of the MRP DCP. The proposed signage should be redesigned to comply with the DCP.	It is noted that this arrangement only occurs on Lot 1 and Lot 4 as these warehouses have one street frontage only. Nevertheless, the updated Architectural Drawings (**Appendix C** of the Submissions Report) have been updated to note that "*if two illuminated signs are located on a single elevation, restrict illumination to one sign*". Refer to SP1-AE-DA-A105 of the updated Architectural Drawings.
7. The mega graphics text shown on some elevations (e.g. drawing no. SP1-ES-DA- C102) is not consistent with the objectives of section 4.2.8 of the MRP DCP and is not supported.	It is unclear how the proposed mega graphics text is inconsistent with the objectives of Section 4.2.8 ('Signage and Estate Entrance Walls') of the MRP DCP. The proposed graphics promote an integrated design approach that provides visual interest which is in character with the proposed architectural and landscape design. The mega graphics text provides a point of difference within what will be an established industrial precinct of large Colorbond warehouses. It also is consistent with Section 4.2.5(8) of the MRP DCP which requires elevations visible from the public domain (where the mega graphics text is proposed) to be finished with materials and colours that enhance the appearance of that façade and provide an attractive and varied streetscape. Further, the graphics encourage and promote sustainable large-scale industrial development. It is noted that mega graphics text was approved by DPHI on multiple warehouses at The Yards industrial estate under SSD-9522 and SSD-25725029. No issues were raised by DPHI regarding the mega graphics during the assessment of these SSDAs.

Others	
1. The civil response (Appendix K) is in draft and figures appear to be missing from the response. Please finalise these documents prior to submission.	We note this was provided to DPHI via email on 19 April 2024. The Civil Response (**Appendix M** of the Submissions Report) has been finalised to include a joint letter by AT&L and Costin Roe to support the western trunk drainage channel that connects between the site and the Barings site to the immediate west.
2. The interim letter of advice prepared by Biosis (Appendix 0) identifies that consultation with registered Aboriginal parties is still ongoing. Please update the advice and cultural heritage assessment once this consultation has been completed.	We note this was provided to DPHI via email on 8 May 2024. The Aboriginal Cultural Heritage Response (**Appendix Q** of the Submissions Report) has been updated by Biosis following the completion of the consultation period in relation to the revised reburial location. No objections were received.