



4 July 2022

Giles Bloxham  
Environmental Assessment Officer  
Department of Planning and Environment  
4 Parramatta Square, 12 Darcy Street  
Parramatta NSW 2124

Dear Giles

SSD7348 - MOD10 RFI RESPONSE

We refer to Penrith Council's letter, dated 13 April 2022, providing comments on SSD7348 MOD10.

Please see Table 1 appended, which includes responses to items raised in Council's letter.

Yours sincerely

A handwritten signature in black ink, appearing to read "Guy Smith".

Guy Smith  
Head of Planning

**Goodman Group**

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**Table 1.**

**SSD7348 MOD10 – Penrith Council RFI Response, letter dated 13.04.22**

RFI		Response
<b>1</b>	<b>Planning Considerations</b>	
(d)	<p>Council objects to the site layout proposed for Warehouses 5A and 5B.</p> <p>Council strongly recommends that the Department request that the site layout be amended to provide safe and separated access from the staff and visitor parking to each office and warehouse. Future development applications for warehousing in this arrangement will not be supported by Council.</p> <p>Approval for the current layout will set an undesirable and unsafe precedence which has been avoided in the Precinct thus far.</p> <p>Staff and visitors must not be required to cross heavy vehicle driveways and manoeuvring areas. Secondary measures such as line-marking and boom gates should not be considered. Secondary measures are subject to user error and Council cannot manage compliance with consent conditions surrounding use and management of such systems.</p>	<ul style="list-style-type: none"><li>As Masterplan update (Precinct 5) removed from MOD10 application – no longer relevant.</li></ul>
	<p>The applicant is to be advised that Penrith City Council will not accept boom gates, light systems or crossings as an alternative measure to providing safe pedestrian access and the future development application may not be supported on this issue.</p>	<ul style="list-style-type: none"><li>N/A - Masterplan update removed.</li></ul>

<p>The access driveways and crossovers within the cul-de-sac of Tundra Close are not perpendicular to the roadway (see access for warehouse 5A2) which should not be supported.</p>	<ul style="list-style-type: none"> <li>▪ N/A - Masterplan update removed.</li> </ul>
<p>Due to the number of access points provided to each building from Tundra Close, competing, and unsupportable heavy and light vehicle manoeuvres will likely occur. Staff and visitor parking access is to be separated and located furthest from the heavy vehicle access/egress points.</p>	<ul style="list-style-type: none"> <li>▪ N/A - Masterplan update removed.</li> </ul>
<p>Tundra Close could be extend toward east to provide sufficient and safe separated heavy vehicle access.</p>	<ul style="list-style-type: none"> <li>▪ N/A - Masterplan update removed.</li> </ul>
<p>Strong consideration shall be given to requiring shared truck entry and exit point for the two warehouses. Warehouse 5A1 could also be rotated 90 degrees clockwise to separate access.</p>	<ul style="list-style-type: none"> <li>▪ N/A - Masterplan update removed.</li> </ul>
<p>Warehouse 5A2 is not provided with separated entry and exit points for heavy vehicles. It has not been made clear from plans provided, that a conflict will not arise when entering and exiting heavy vehicles meet on this same driveway. Separate entry and access points for heavy vehicles are to be provided for 5A2.</p>	<ul style="list-style-type: none"> <li>▪ N/A - Masterplan update removed.</li> </ul>
<p>The current arrangement of entry and exit points in the cul-de-sac and location and design of truck manoeuvring/driveways and staff parking and access points should not be supported and must be re-designed.</p>	<ul style="list-style-type: none"> <li>▪ N/A - Masterplan update removed.</li> </ul>
<p>Should this warehouse be split into two and operated by separate tenants, the rear (northern) portion of the warehouse will need to be provided with staff and visitor parking which does not require pedestrians to traverse areas of hardstand which are utilised by</p>	<ul style="list-style-type: none"> <li>▪ N/A - Masterplan update removed.</li> </ul>

heavy vehicles and which does not require excessively long paths of travel.	
The layout would need to be amended to provide separated heavy vehicle, and staff and visitor access points.	<ul style="list-style-type: none"> <li>▪ N/A - Masterplan update removed.</li> </ul>
Warehouse buildings including gatehouse structures are to be provided with easily accessible and convenient amenities and staff areas. It is noted that the second gatehouse and dock office (north elevation of Warehouse 5A) is relatively isolated from the office amenities and that any additional warehouse amenities are not indicated.	<ul style="list-style-type: none"> <li>▪ N/A - Masterplan update removed.</li> </ul>
<b>(e) Signage</b>	
No objections are raised to the reduction in scale of building identification signs “D” and “E” or to the requisite signage zones.	<ul style="list-style-type: none"> <li>▪ Noted.</li> </ul>
<p>Section 2.1.3 and Section 3.2 of the applicant’s statement do not clarify the proposed final height of the approved pole sign and it is assumed that the proposal is to increase the height of the pole sign by 4m.</p> <p>Pole signage shall not be raised in height. The additional height is not required to assist in brand advertising or wayfinding. An increase in height to match the bulk or scale of the building is not adequate justification and will set an undesirable precedence.</p>	<ul style="list-style-type: none"> <li>▪ The proposed 16m high pylon sign is considered appropriately scaled when considering contextually against the adjacent 36m high host building;</li> <li>▪ The signage is not used for advertising, but rather important ‘building’ and ‘business’ identification.</li> <li>▪ The proposal will not set an undesirable precedent as more recessively sized entry signage would be appropriate in alternative precincts where standard warehouses (13.7m ridge height) are proposed.</li> <li>▪ The proposed pylon sign is located away from any sensitive receivers.</li> </ul>

<p>The proposal to increase signage height does not comply with the DCP requirements for signs in the Estate (Section C9 and E6 of the Penrith DCP) which require the height of pole signs to be no greater than 7m.</p>	<ul style="list-style-type: none"> <li>▪ As SSD7348 is State Significant Development, the Penrith DCP's 7m signage height control does not apply to the proposal and not therefore relevant to the assessment.</li> </ul>
<p>The proposal to raise the height of the pole sign is contrary to the objectives and matters for consideration under SEPP (Industry and Employment) 2021 – Chapter 3, Schedule 5 as the signage is:</p> <ul style="list-style-type: none"> <li>- not compatible with the desired future character of the area (as is set by the limiting of pole signs to 7m under the DCP) and,</li> <li>- will detract from the amenity and visual quality of the area, will have a dominating effect, and</li> <li>- the scale is not appropriate for the streetscape, setting and landscape, and</li> <li>- will not contribute positively to the streetscape,</li> <li>- does not reduce clutter, screen unsightliness, or provide visual interest, and</li> <li>- will protrude above nearby canopy.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Goodman disagrees that the proposal is not compatible with Schedule 5 of SEPP (Industry and Employment) 2021 - refer to assessment of the proposal against Schedule 5, included in SEE. In particular: <ul style="list-style-type: none"> <li>– The signage is appropriately scaled to respond to the significant scale of adjacent industrial built form, which characterises the area.</li> <li>– It is not agreed that the signage will detract from the visual quality of the area and not contribute positively to the streetscape. It will provide an appropriately scaled entry sign to match that of the Oakdale West Estate precinct.</li> <li>– The proposed pylon entry sign will not have a 'dominating effect' when viewed contextually against the significant adjacent warehouses.</li> <li>– The proposed S1 sign is the only one of its kind proposed for the entire Oakdale West Estate precinct. As the S1 sign has already been approved for this location and with the same width, it is not agreed that the additional 4m of height will result in additional or unacceptable visual clutter.</li> <li>– It is argued that the scale of the sign will provide visual interest, providing suitable announcement of Oakdale West Estate at this key gateway location on entering the precinct.</li> <li>– Given that the purpose of the signage is to identify the Oakdale West precinct, it is considered necessary to be of a</li> </ul> </li> </ul>

		scale to necessarily protrude above the nearby canopy, and not be obscured by it.
(f)	<b>Gross floor area (GFA)</b>	
	No objection is raised in relation to Precinct gross floor area increase, noting that the overall OWE GFA remains as approved.	<ul style="list-style-type: none"> <li>▪ Noted.</li> </ul>
<b>2</b>	<b>Development Engineering Considerations</b>	
(g)	The proposed modification seeks a total of five (5) driveways accessing the site from the cul-de-sac. Heavy vehicle movements will conflict with staff and visitor car parking movements within the cul-de-sac, which is not supported.	<ul style="list-style-type: none"> <li>▪ N/A - Masterplan update removed.</li> </ul>
	Safety concerns are raised for the location of the staff car park for Warehouse 5A1 as pedestrians will be required to cross the heavy vehicle driveway to access the building which is not supported. The previously approved Masterplan for Precinct 5 had separated the heavy vehicle areas from the staff car parking areas. The use of a boom gate and traffic signal system is not supported.	<ul style="list-style-type: none"> <li>▪ N/A - Masterplan update removed.</li> </ul>