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URBIS

SUBMISSIONS REPORT

74 Edinburgh Road,
Marrickville

Prepared for
WOOLWORTHS GROUP LIMITED
27 September 2021

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EXECUTIVE SUMMARY

This Submissions Report has been prepared by Urbis on behalf of Woolworths Group Limited (**the Proponent**) to address the matters raised by government agencies, and public and community organisation groups during the public exhibition of the proposed Woolworths Warehouse and Customer Fulfilment Centre at 74 Edinburgh Road, Marrickville (**the site**).

Background

In October 2020, Woolworths Group Limited submitted a State significant development application (**SSDA**) for the redevelopment of the site. The SSDA seeks consent for the demolition of existing buildings and the construction of a two-storey warehouse comprising a speculative warehouse and Woolworths semi-automated Customer Fulfilment Centre. Consent is also sought for construction of a five storey office building to be used by CFC workers and WooliesX, a business unit within Woolworths Group Limited.

The SSDA was lodged with Department of Planning, Industry and Environment (**DPIE**) in accordance with Schedule 2 of *State Environmental Planning Policy (State and Regional Development) 2011* (**the SRD SEPP**). The determining authority is the Minister for Planning and Public Spaces (**the Minister**).

DPIE issued a letter to the Proponent on 8 December 2020, requesting a response to the issues raised during the public exhibition of SSD 10468. This Submissions Report outlines the revised proposal and responds to all concerns raised within submissions, including supplementary responses received following the receipt of the DPIE letter as outlined above.

Overview of Submissions

The SSDA was on public exhibition from 29 October 2020 to 25 November 2020. During this period, a total of 24 submissions were received from community and stakeholder groups. Submissions were received from:

- Environment, Energy and Science Group
- Transport for NSW (TfNSW)
- Transport for NSW (TfNSW) - Roads and Maritime Services Division
- Fire & Rescue NSW
- Heritage NSW – Aboriginal Cultural Heritage
- Inner West Council
- Sydney Water
- Sydney Metro
- Ausgrid
- 16 members of the public.

Categorising Key Issues

The submissions from public authorities and the public have been categorised in a systematic way and in accordance with current draft DPIE guidelines *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C)* dated July 2021.

The Project

Several public submissions raised concerns about the industrial nature of the proposed development and impacts on residential amenity. Concerns predominantly related to the following:

- **Hours of operation** – increase in noise and light levels due to the 24 hours operation, 7 days per week.
- **Noise** – noise impacts associated with construction and 24/7 operation and disturbance to sleep.
- **Traffic** – increase in traffic on the health of local community and residents, including increased truck activity along Edinburgh Road.

- **Access** – the main vehicular access to the site for passenger vehicles being via the signalised access point from Edinburgh Road, opposite Smidmore Street, and the proposed emergency access point.
- **Built form** – consistency of density and height with local character and adjoining residential areas.
- **Visual privacy** – potential for overlooking from office component to adjoining residential areas.
- **Tree removal** – removal of trees and landscape buffer to adjacent residential areas.
- **Construction** – cumulative impacts of construction sites in the vicinity specifically regarding dust, noise and loss of on-street car parking to construction workers.

Economic, Environmental and Social Impacts

The issues raised regarding the potential economic, environmental, and social impacts of the proposal are summarised as follows:

- **Flooding** – the Environment, Energy and Science Group (**EES**) advised the proponent will need to prepare a comprehensive emergency response management plan in consultation with the NSW SES and Council to protect workers and visitors from hazards during major and rarer flood events. Inner West Council also requested the Flood Management Report include a post development flood scenario.
- **Transport and Access** - TfNSW requested additional information regarding the SIDRA modelling, swept paths, vehicle queuing along Edinburgh Road and raised concerns regarding the overall safety and operation of the Edinburgh Road approaching the signalised intersection. Inner West Council also requested the Traffic and Access report assess the effect of cumulative traffic impacts from the adjacent developments.
- **Fire** - Fire & Rescue NSW were satisfied with the hazard and risk aspect of the proposal. FRNSW also requested a comprehensive Emergency Response Plan (ERP) is developed for the site.
- **Aboriginal Cultural Heritage** - Heritage NSW requested the Aboriginal Cultural Heritage Assessment (**ACHAR**) is completed and the EIS updated to reflect its findings, with both documents referred to Heritage NSW for review.
- **Stormwater and Water Servicing** – Inner West Council requested the Proponent consult with Sydney Water regarding the stormwater channel. Sydney Water requested the stormwater channel be diverted to avoid buildings or permanent structures being located over Sydney Water assets.
- **Sydney Metro site** – Inner West Council and Sydney Metro requested the potential re-development of the adjoining Sydney Metro site be considered. Sydney Metro also requested further information regarding future improvements to the cycle network and public domain and consideration of the strategic importance of the site based on its proximity to Sydenham Station Junction.
- **Acoustic** – Inner West Council and DPIE requested an amended acoustic assessment, including consideration of truck movements to and from the site during the night and the proposed 24/7 operations.

Actions Taken Since Exhibition

The Proponent has consulted further with Sydney Water to discuss the diversion of the Sydney Water stormwater culvert through the site. An agreement was reached to deviate Sydney Water's stormwater channel with a box culvert to avoid buildings or permanent structures over the future stormwater channel. Sydney Water has advised they would not object to the proposal if the stormwater channel is deviated as per the meeting outcomes from 25 September 2020.

The Proponent has refined the proposed building design in response to the submissions and ongoing consultation with Sydney Water. The northern building façade is now located at least 1 metre away from the stormwater easement, resulting in a minor GFA reduction of 600sqm. A copy of the updated architectural plans and supplementary design report is provided at Appendix C and D.

The Stage 4 consultation with Registered Aboriginal Parties (**RAP**) has also been completed. The draft ACHAR was sent to RAPs via email on 13 January 2021 with a request for comment prior to 10 February 2021. One response was received from Kamilaroi Yankuntjatjara Working Group which agreed and supported the recommendations.

Ongoing consultation has also been undertaken with TfNSW regarding the transport and traffic related matters, including meetings, discussions and emailed correspondence between the applicant, TfNSW and

DPIE. This included follow up submissions prepared by the applicant to respond to matters raised by TfNSW, including an updated Traffic Control Site (TCS) Plan, with 'in-principle' support provided by TfNSW on 21 September 2021.

Response to Submissions

Additional environmental assessment of proposed stormwater, flooding, noise, traffic and parking, hazardous materials and fire has also been undertaken to respond to the submissions as summarised below.

- **Stormwater:** Richmond + Ross have prepared an amended Stormwater Management Plan in response to Inner West Council's submission and diversion of Sydney Water's stormwater culvert. The amended stormwater design has been assessed and the impacts are considered acceptable from a stormwater perspective. A Technical Memo has also been prepared to directly respond to comments from Inner West Council.
- **Flooding:** Richmond + Ross have prepared an amended Flood Management Plan. The report responds to the flooding matters raised by Inner West Council and EES. The post development conditions are categorised as low hazard during a 1% AEP storm event and subject to low hazard flooding during a PMF event, a reduction in the hazard category. A Flood Management Plan has been prepared in consultation with the SES.
- **Acoustic:** an updated SSDA Acoustic Assessment (Revision 7, dated 1 September 2021) has been prepared by Acoustic Logic. The updated report includes additional information regarding the modelling and/or assessment of potential noise impacts. It also includes updated mitigation measures to comply with noise emission requirements, including detailed design of plant and equipment, installation of acoustic barriers and operational requirements for night-time truck movements. The updated report is accompanied by correspondence dated 31 August 2021. The correspondence clearly identifies the sections of the report which have been updated to respond to feedback from DPIE, Inner West Council and the local community.
- **Traffic and Parking:** Colston Budd Rogers & Kafes Pty Ltd (**CBRK**) have prepared an updated Traffic and Parking Assessment and accompanying correspondence dated 20 August 2021 to address TfNSW, Inner West Council and Sydney Metro submissions. The updated assessment provides clarification regarding heavy vehicle movements and impacts on the surrounding road network. The findings have not materially changed from those in the original assessment. The accompanying correspondence summarises the issues and responses to the traffic-related matters raised during the assessment process. The final Traffic Control Site Plan incorporates each of the changes requested by TfNSW, including the potential for a future median to be funded and constructed by others, if required.
- **Hazardous Materials:** RiskCon have prepared an updated SEPP 33 Assessment to verify the dangerous goods (**DGs**) to be stored on the site. The assessment has considered the quantities of DGs that will be stored and associated vehicle movements. The results of the analysis indicate the threshold quantities for the DGs to be stored and transported are not exceeded and therefore SEPP 33 does not apply to the project.
- **Fire:** First 5 Minutes have prepared a comprehensive Emergency Response Plan (**ERP**) in response to the Fire & Rescue NSW submission. The ERP identifies foreseeable on-site and off-site fire events and other emergency incidents. It details the appropriate risk control measures that would need to be implemented to safely mitigate potential risks to the health and safety of firefighters and other first responders.

Evaluation and Conclusion

This Submissions Report has responded to the issues raised within the referral authority, community and public submissions received regarding the proposed redevelopment and is accompanied by:

- Updated architectural drawings which detail the proposed changes to the original proposal.
- Supplementary reports and memos which provide additional clarification and information regarding technical issues.

The report and the supporting documents have been informed by additional consultation and engagement with key stakeholders including Sydney Water and Registered Aboriginal Parties.

Overall, it is considered the updated proposal is acceptable having regard to the relevant environmental, economic and social considerations:

- The proposal satisfies the applicable State Environmental Planning Policies, and relevant environmental planning instruments that apply to the site. The proposed warehouse use is permitted with consent. The 'office premises' component can be approved in accordance with Clause 4.38 (3) of the EP&A Act.
- The updated proposal remains aligned with the strategic policy objectives as it:
 - Seeks to deliver more efficient supply chains, reduce business costs, increase access to markets and enhance access to a greater number of skilled workers by locating the warehouse and distribution centre in an accessible location close to public transport and residential dwellings.
 - Integrates industrial and ancillary office land uses within close proximity to public transport to facilitate 30-minute cities.
- The updated proposal will not have any unacceptable environmental impacts, as:
 - The proposal presents an appropriate built form in an industrial zoned area.
 - The proposed road infrastructure upgrade works have been designed in consultation with TfNSW to avoid unacceptable traffic impacts and minimise pedestrian and vehicle conflicts.
 - The potential noise impacts have been assessed in detail and satisfactorily address the relevant guidelines, subject to implementation of recommended mitigation measures.
 - The proposal respects the industrial history and character of the place and will not obstruct or impact the vicinity heritage items in any way.
 - The proposal will have minimal visual impact from key locations in the public domain.
 - The siting and design of the development is considered appropriate for the site based on its generous setbacks, high quality landscaping along public roads, façade design, building articulation and high-quality materials.
 - The proposal will not cause additional overshadowing to sensitive residential receivers or public domain areas.
 - The proposal will not result in significant air quality and odour impacts during the construction and operational phases of the development.
 - The proposed development will have no significant impact on current flood volumes, flood depths and existing flood hazard categories up to the 1% AEP storm event.
 - The proposal is not classified as potentially hazardous and the Site can be made suitable for the proposed development.
- The proposal remains suitable for the site as it protects existing industrial land and provides opportunities for the provision of jobs and employment throughout the construction and operational stages.
- The proposed development is in the public interest as the amended proposal will deliver a high-quality development that significantly improves the streetscape presentation of the Site when viewed from Edinburgh Road and Sydney Steel Road.

As outlined throughout this Submissions Report, this additional information does not modify the conclusions of the planning assessment provided in the Environmental Impact Statement submitted with SSD-10468.

Overall, the proposal is considered to be in the public interest and should be approved by the NSW DPIE, subject to appropriate conditions of consent.

1. INTRODUCTION

1.1. OVERVIEW

This Submissions Report has been prepared by Urbis on behalf of Woolworths Group Limited (**the Proponent**) to address the matters raised by government agencies, and public and community organisation groups during the public exhibition of the proposed Woolworths Warehouse and Customer Fulfilment Centre at 74 Edinburgh Road, Marrickville (**the site**).

The Department of Planning, Industry and Environment (**DPIE**) issued a letter to the Proponent on 8 December 2020, requesting a response to the comments raised during the public exhibition period for SSD-10468. During this period, submissions were received from:

- Environment, Energy and Science Group
- Transport for NSW (TfNSW)
- Transport for NSW (TfNSW) - Roads and Maritime Services Division
- Fire & Rescue NSW
- Heritage NSW – Aboriginal Cultural Heritage
- Inner West Council
- Sydney Water
- Sydney Metro
- Ausgrid

In addition, submissions were received from the general public and adjoining property owners. The key matters raised in the agency and public submissions include:

- Hours of operation
- Impacts on residential amenity
- Noise
- Traffic
- Flooding
- Vehicular access and traffic
- Water servicing

This report provides a response to the matters identified by DPIE and the issues raised in the agency and public submissions received.

1.2. STRUCTURE OF THIS REPORT

This Submissions Report is structured in accordance with the DPIE's draft guidelines *Preparing a Submissions Report – State Significant Development Guide* as follows:

- Section 2 – Analysis of Submissions
- Section 3 – Actions taken since Exhibition
- Section 4 – Response to Submissions
- Section 5 – Updated Evaluation of Project

1.3. SUPPORTING DOCUMENTATION

This Submissions Report is supported by the following amended documentation.

Table 1 Supporting Documentation

Appendix	Report	Prepared By	Date
Appendix A	Submissions Register	Urbis	February 2021
Appendix B	Updated Mitigation Measures	Urbis	February 2021
Appendix C	Amended Architectural Plans	Nettleton Tribe	15 January 2021
Appendix D	Amended Architectural Design Report	Nettleton Tribe	February 2021
Appendix E	Aboriginal Cultural Heritage Assessment Report (ACHAR)	Urbis	12 February 2021
Appendix F	Amended Stormwater Management Plan	Richmond + Ross	February 2021
Appendix G	Amended Stormwater Drawings	Richmond + Ross	February 2021
Appendix H	Amended Flood Management Plan	Richmond + Ross	February 2021
Appendix I	Technical Memo – Flooding	Richmond + Ross	February 2021
Appendix J	Updated Acoustic Report	Acoustic Logic	1 September 2021
Appendix K	Acoustic Response to Submissions	Acoustic Logic	6 August 2021
Appendix L	Acoustic Response to DPIE Queries	Acoustic Logic	31 August 2021
Appendix M	Amended Traffic and Access Report	Colston Budd Rogers & Kafes Pty Ltd	October 2020 (updated January 2021)
Appendix N	CBRK Consolidated Traffic Response and TCS Plan	Colston Budd Rogers & Kafes Pty Ltd	12 August 2021
Appendix O	Amended SEPP 33 Assessment	Riskcon	22 January 2021
Appendix P	Emergency Response Plan – Fire	First 5 Minutes	11 January 2021
Appendix Q	Amended Draft Construction Management Plan	Root Partnerships	5 February 2021

2. ANALYSIS OF SUBMISSIONS

2.1. BREAKDOWN OF SUBMISSIONS

The SSDA was on public exhibition from 29 October 2020 to 25 November 2020. During this period, a total of 24 submissions were received from community and stakeholder groups. A breakdown of the submissions by respondent type and their position is provided below.

Table 2 SSD DA Submissions Received by Respondent Type

Submitter	Position	Number of Submissions
Public Authorities and NSW Government Agencies		
Environment, Energy and Science Group	Comment	1
TfNSW - Roads and Maritime Services Division	Comment	1
Fire & Rescue NSW	Comment	1
Heritage NSW – Aboriginal Cultural Heritage	Comment	1
Transport for New South Wales	Comment	1
Inner West Council	Comment	1
Sydney Water	Comment	1
Sydney Metro	Comment	1
Organisation		
Ausgrid	Comment	1
SUBTOTAL		8
Community Submissions		
General Public	Object	14
General Public	Comment	2
SUBTOTAL		16

Follow up correspondence was received from public authorities and NSW government agencies following the preliminary exhibition and referral period. This included additional emailed correspondence from DPIE regarding the assessment of the acoustic impacts and requesting responses to additional matters raised by TfNSW, Heritage NSW and Inner West Council.

Where relevant, these matters are addressed within Section 2.3, including issues raised within the original submissions and any additional matters identified within separate additional requests for information.

2.2. SUMMARY OF COMMUNITY FEEDBACK

The community feedback identified within the submissions received predominantly related to:

- **Hours of operation** – increase in noise and light levels due to the 24 hours operation, 7 days per week.
- **Noise** – noise impacts associated with construction and 24/7 operation and subsequent disturbance to sleep.
- **Traffic** – increase in traffic on the health of local community and residents, in particular the implications of increased truck activity along Edinburgh Road.
- **Access** – concerns regarding vehicular access to the site, including the main vehicular access to the site for passenger vehicles via the signalised access point from Edinburgh Road, opposite Smidmore Street and location of the proposed emergency access point.
- **Built form** - density and height proposed considered to be inconsistent with the local character and adjoining residential areas.
- **Visual privacy** – potential for overlooking from office component to adjoining residential areas.
- **Tree removal** – removal of trees and landscape buffer to adjacent residential areas.
- **Construction** – cumulative impacts of construction sites in the vicinity specifically regarding dust, noise and loss of on-street car parking to construction workers.

These matters were also raised in a follow up session with representatives on behalf of the proponent and attended by residents of Bourne and Leicester Streets on 15 June 2021 and as outlined in Section 4.4.

2.3. GOVERNMENT AGENCIES

2.3.1. Environment, Energy and Science Group

The Environment, Energy and Science Group (EES) advised the proponent will need to prepare a comprehensive emergency response management plan in consultation with the NSW SES and Council to protect workers and visitors from hazards during major and rarer flood events. A detailed response to EES's submission is provided in Section 4.2.1.

2.3.2. Transport for NSW

The following recommendations were provided in the joint response from Transport for NSW (TfNSW) and Roads and Maritime Services (RMS) division dated 18 November 2020:

- **Modification of Existing Traffic Control Site (TCS)** – request the Proponent provides:
 - Electronic copy of the SIDRA modelling data, which includes current and future use of the intersection layout; and
 - Swept path analysis for the turning movements proposed with the largest size vehicle with all movements at the proposed additional leg of the intersection.
- **Transport Impact Assessment (TIA)** – request the Proponent provides:
 - A revised TIA is requested with inclusion of SIDRA modelling of the subject signalised intersection, specifically in relation to concerns regarding vehicle queuing along Edinburgh Road between Smidmore Street and Sydney Steel Road.
 - Provide 'in principle' support to the right-hand movement and creation of diamond phase, subject to being supported by the modelling and capacity to be accommodated.
 - Clarify the maximum size vehicle to be utilised by the site and the route path proposed.
 - Clarify the reasoning and management details of this separated access arrangement.
 - Clarify how point-to-point vehicles will operate to the site and provide details on how they will be managed.

- Review the swept path of all semi-trailer movements to ensure that the vehicles can operate without impacting the proposed car parking areas.
- Review the use of bicycles for deliveries and whether it should be incorporated into the design of the site.
- Clarify proposed number of end-of-trip facilities is required to ensure that there is adequate provision to support and encourage active transport.

Additional comments were also received from TfNSW on 28 January 2021. TfNSW requested:

- Pedestrian protection should be included in the SIDRA model;
- SIDRA model includes the traffic generation from the recently completed Marrickville Metro Shopping Centre redevelopment;
- The proponent details the methodology of calibration and how the SIDRA base model accurately reflects the existing network conditions; and
- Signal timing phase splits and cycle lengths should be confirmed with scats.traffic.signal.data@transport.nsw.gov.au.

A further request for additional information was received from TfNSW on 1 March 2021. In summary TfNSW requested:

- A network model;
- Amendments to the SIDRA model;
- Review of traffic volume inputs; and,
- Further consideration of the safety and operation of vehicles along Edinburgh Road approaching the signalised intersection.

A further request for additional information was received from TfNSW on 19 March 2021. A meeting was also held between representatives of the applicant, DPIE and TfNSW on 29 March 2021. In summary, TfNSW requested:

- Clarification on proposed traffic generation during peak periods;
- Amendments to the SIDRA model;
- Review of right turn bay layout into the site;
- Consideration of the sites relationship with Marrickville Metro and associated road works;
- Review of proposed impacts on the level of service.

A further request for additional information was received from TfNSW on 25 May 2021. In summary, TfNSW requested:

- An updated SIDRA model to reflect minimum pedestrian and other corrections.
- Request provision is made for a median in Edinburgh Road between Smidmore Street and Sydney Steel Road and amended modelling also includes this option.
- Request mitigation measures to maintain a similar level of service and further consideration of the banning of the right turn from the west. Any negative delay to the network should be demonstrated with your SIDRA model if this measure is not appropriate.
- Identify future median on Edinburgh Road on the TCS plan.

A further email request for additional information was received from TfNSW on 14 July 2021 which raised additional issues as summarised below:

- Clarification of the time referred to in the applicant's analysis.
- Clarification of the overall intersection delay increases with a right turn movement.
- Inclusion of the upstream traffic impacts to all traffic that might be affected.

- Results from a route performance analysis undertaken by TfNSW using the applicant's geometry and phasing.

A detailed response to each of the above submissions is provided in Section 4.2.2.

2.3.3. Fire & Rescue NSW

Fire & Rescue NSW raised the following points for consideration:

- **SEPP 33 screening assessment** – satisfied with the hazard and risk aspect of the proposal.
- **Emergency Response Plan** – request a comprehensive ERP be developed for the site.
- **Local emergency management committee** - once constructed and prior to operation, request the operator of the facility contacts the relevant local emergency management committee (LEMC).
- **BCA performance solutions** – request the performance solutions in the BCA report are approved through consultation with FRNSW and the submission of a fire engineering brief questionnaire (**FEBQ**).

A detailed response to each of the points raised in Fire & Rescue NSW's submission is provided in Section 4.2.3.

2.3.4. Heritage NSW – Aboriginal Cultural Heritage Assessment

The original submission from Heritage NSW dated 25 November 2020 noted the ACHAR was a working draft and did not include sufficient information for their review. The Stage 4 consultation with the registered Aboriginal parties (**RAPs**) was subsequently completed in January-February 2021 and the final ACHAR dated 12 February 2021 was provided to Heritage NSW for their review and comment.

The supplementary submission provided by Heritage NSW dated 19 July 2021 provides support for the assessment and conclusion within the ACHAR. However, the recommended monitoring was not considered to be a sufficient assessment. It is recommended an Aboriginal cultural heritage research and design and excavation methodology, including a staged testing and salvage programme, be developed for areas with intact deposits. The required methodology is to be developed in consultation with the RAPs for the project.

A detailed response to each of the points raised in Heritage NSW's submission is provided in Section 4.2.4.

2.3.5. Inner West Council

Inner West Council raised the following points for consideration:

- **Flooding** – request the following be considered in the detailed assessment of the development:
 - Request plans are amended to increase the minimum floor levels of the proposed development to 5.11m AHD.
 - Request information on the design of inlet structures or if any blockage factors have been applied to the modelling. The inlet structures should incorporate kerb inlet, or "letter box" type inlet structures that are less prone to blockage with best practice blockage factors applied. Details of an overland flow path should also be provided in case of failure of the system.
 - Request the Flood Management Report include a post development flood scenario (change in flood depth map) with total blockage of the inlet structures.
 - Request a post development PMF change in flood depth map is provided as adjacent redevelopment sites (for example Marrickville Metro) have produced Flood Emergency Response Plans based on existing PMF levels and an assessment needs to be made if the change in PMF levels post development is of any consequence.
- **Stormwater** – request consideration be given to the following in the detailed assessment of the development:
 - A Council Stormwater pipe drains through the site to the existing Sydney Water Channel. Council's stormwater asset shall not be built out but be suitably relocated away from the proposed building.
 - Recommend the applicant approach Sydney Water regarding their requirements with regard to the Stormwater Channel.

- **Traffic** - request consideration be given to the following in the detailed assessment of the development:
 - Vehicular access and associated vehicle standing areas shall be designed in accordance with Australian Standard AS 2890.1-2004, AS2890.2-2002, AS2890.6-and Part 2.10 of Marrickville Development Control 2011.
 - Traffic and Access Report should assess the effect of cumulative traffic impacts from the adjacent developments.
 - The proposal should incorporate traffic generation from the current “Part 3A” redevelopment project of the Marrickville Metro in their calculations. An amended traffic report incorporating a revised traffic assessment incorporating future traffic from other developments should be submitted.
 - The Traffic Signals design shall be amended to include bicycle lanterns.
 - Clarify if the off-road shared pedestrian/ cycle path has been designed to be a minimum width of 3 metres.
 - Road widening in Sydney Steel Road should be provided and be detailed on the plans.
- **Edinburgh Road** – recommend the ground floor Edinburgh Road frontage be amended to incorporate additional activation through additional active ground floor uses which “wrap” the parking.
- **Sydney Metro site** – request the future potential re-development of the adjoining Sydney Metro site is considered. Matters such as driveway locations, truck turning bays, window, lighting locations, pedestrian accessibility/ safety and width of Sydney Steel Road should all be considered.
- **Acoustic** - the potential acoustic impacts from the proposed operations needs to be closely assessed and controlled as part of the current application to ensure minimal impacts for the locality and community. Concerns regarding truck movements to and from the site during the night should be reviewed and measures to mitigate noise emissions from trucks must be incorporated into any consent.

A detailed response to each of the points raised in Inner West Council’s submission is provided in Section 4.2.5.

2.3.6. Sydney Water

Sydney Water raised the following points for consideration:

- **Water Servicing** – The property has a partial frontage to an existing 150mm watermain in Sydney Steel Road. Depending on the connection location a possible extension may be required.
- **Wastewater Servicing** - The site is traversed by a deep oviform trunk main and a 225mm reticulation main. A connection to the 225mm sewer main will be required to service the future development.
- **Stormwater** - Woolworths representative, Water Servicing Coordinator and Sydney Water have reached an agreement to deviate Sydney Water’s stormwater channel with a box culvert with the dimension of 3,000mm × 1,500mm in such a way that there are no more buildings or permanent structures over Sydney Water’s future stormwater channel. Sydney Water would not object to the current proposal, if the Sydney Water’s stormwater channel is deviated as per the above drawing and comply with the meeting outcomes which was held on 25 September 2020.

A detailed response to each of the points raised in Sydney Water’s submission is provided in Section 4.2.6.

2.3.7. Sydney Metro

Sydney Metro raised the following points for consideration:

- **Response to broader precinct outcomes** - The proponent must consider:
 - The potential future land use outcomes of Sydney Metro’s residual site opposite the subject development site, as presented by Sydney Metro during consultation undertaken prior to the exhibition of the EIS.
 - The proposed development should design for activation in an urban setting along Sydney Steel Road and have regard for the interface of the Woolworths development with cyclists, pedestrians and the public domain.

- **Traffic and Transport Matters** - The proponent must:
 - Consult with Sydney Metro in relation to any proposed changes to intersection construction staging works, construction site access and egress, or haulage movements. In particular, the proponent is to advise of changes that may impact the operation and construction of the Sydney Metro Train Facility South.
 - Provide further information regarding any future improvements to the cycle network and public domain taking into account the interface with vehicular movements generated from the development, whilst also delivering commuter safety and public domain amenity outcomes.
 - Consider the strategic importance of the subject development site in proximity to Sydenham Station Junction, taking into account opportunities to leverage off public transport infrastructure when targeting mode share for the proposed development.

A detailed response to each of the points raised in Sydney Metro's submission is provided in Section 4.2.7.

2.4. ORGANISATION

2.4.1. Ausgrid

Ausgrid has no objection to the development. The following was recommended:

- The Proponent should be made aware that Ausgrid has 132,000V underground cables present in Edinburgh Road.
- The Proponent should obtain the plans through the Dial Before You Dig (DBYD) process and refer to Ausgrid Network Standard NS156 regarding any excavations proposed near these cables.

The Proponent will obtain the plans through the DBYD process and refer to Ausgrid Network Standard NS156 regarding any excavations proposed near these cables.

3. ACTIONS TAKEN SINCE EXHIBITION

3.1. CONSULTATION

Engagement with DPIE and public authorities (where appropriate) has been ongoing. Since the public exhibition of the SSDA (29 October 2020 to 25 November 2020), the Proponent has engaged with government agencies and relevant authorities on technical matters through meetings, telephone discussions and via email correspondence. Key meetings with government agencies following exhibition include:

- **Sydney Water** – a meeting was held with Sydney Water on 25 September 2020 to discuss options to relocate the stormwater culvert and easement which runs horizontally through the site. Subsequent consultation has since occurred via email with Sydney Water. Sydney Water have stated they would not object to the current proposal, if the Sydney Water's stormwater channel is deviated and complies with the meeting outcomes discussed on the 25th of September 2020.
- **ACHAR** – since submission of the SSDA in September 2020, the Stage 4 consultation with RAPs has been completed. The draft ACHAR (Appendix E) was sent to RAPs via email on 13 January 2021 with a request for comment prior to 10 February 2021. One response was received from Kamilaroi Yankuntjatjara Working Group which agreed and supported the recommendations.
- **Transport for NSW** – ongoing discussions and meetings have been held with TfNSW since the receipt of their original submission dated 18 November 2020. The Amended Traffic and Access Report (Appendix M) and accompanying correspondence and Traffic Control Site Plan (Appendix N) prepared by Colston Budd Rogers & Kafes document the key issues raised by TfNSW and the way in which each of the relevant matters has been responded to within the final proposal and updated mitigation measures (Appendix B).

Further consultation was also undertaken with local residents of Bourne and Leicester Streets, Marrickville on 16 June 2021. Key issues included the potential impacts of the proposal on the amenity of the residential properties, including traffic, visual and construction. These matters are addressed in detail throughout the Submissions Report and as summarised in Section 4.

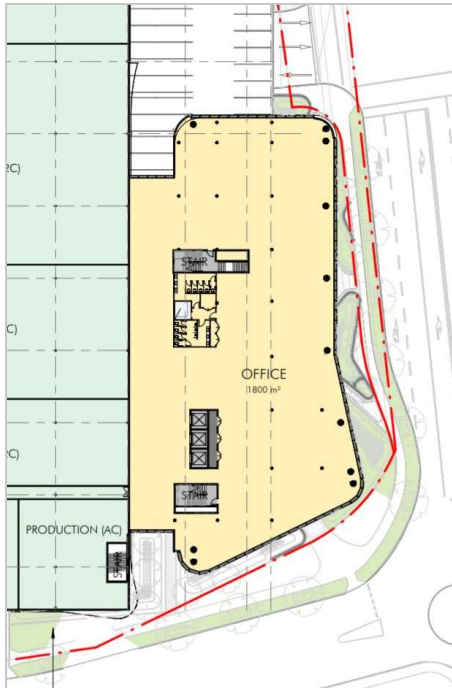
3.2. PLAN REFINEMENTS

The Proponent has refined the proposed building design in response to the submissions and ongoing consultation with Sydney Water.

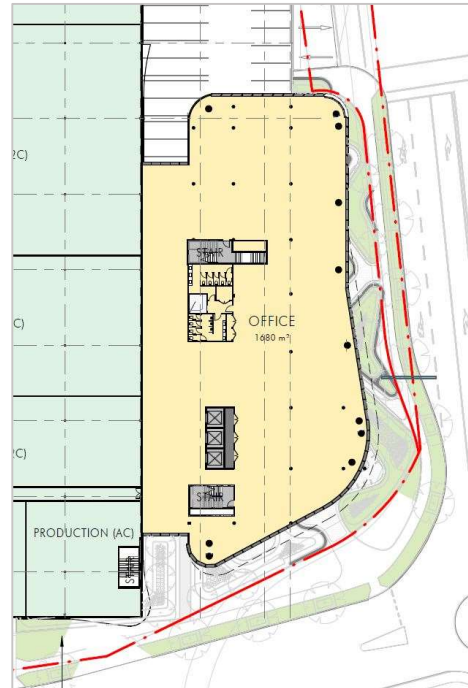
As noted in Section 2.3.6, the Proponent met with Sydney Water on 25 September 2020 regarding the proposed development over Sydney Water's stormwater channel. An agreement to deviate Sydney Water's stormwater channel with a box culvert in such a way that there are no more buildings or permanent structures over Sydney Water's future stormwater channel.

There has been a minor refinement to the building façade alignment since lodgement of the EIS. The northern building façade is now located at least 1m off the stormwater easement and has resulted in a GFA reduction of 600sqm (see Figure 1).

Figure 1 Lodged and Refined Building Footprint – Original/Lodged (left) and Refined (right)



Source: Nettleton Tribe



Source: Nettleton Tribe

3.3. ADDITIONAL ENVIRONMENTAL ASSESSMENT

Additional environmental assessment of proposed traffic, noise, hazardous materials, flooding and fire has also been undertaken. The results and findings of these additional assessments are discussed in the following sections.

3.3.1. Stormwater

The Stormwater Management Plan prepared by Richmond + Ross has been updated to incorporate the culvert diversion requested by Sydney Water (Appendix F). A summary of the revised assessment findings is provided below.

Assessment

Consultation with Sydney Water has revealed that based on a site area of approximately 28,000m², 427m³ of OSD storage is required with a permissible site discharge (PSD) rate of 985l/s. Due to level differences across the site, an area of approx. 1,510m² is to by-pass the treatment train, and the proposed OSD system will be discharged directly to the existing public stormwater network with no restrictions.

To assure the maximum allowable discharge from the site does not exceed the allowable PDS limits, the proposed discharge from OSD tank will be reduced to accommodate the difference. A combined OSD and flood chamber is proposed for the site. The OSD will discharge into the flood storage chamber and then drain directly into the diverted Sydney water owned culvert.

Key components of the Stormwater Management Strategy are outlined below:

- **Rainwater Tanks** - Rainwater tanks are proposed to allow for reuse of collected rainwater from roof areas for toilet flushing.
- **Gross Pollutant Traps** - A Humeceptor has been proposed for each of the catchments to treat runoff prior to entering the filter cartridge chamber. For the purposes of modelling, it is assumed that the whole Site is impervious as a worst-case scenario condition. The Humeceptor will also aid in the removal of hydrocarbon from runoff in vehicle trafficked areas.
- **Filter Cartridges** - The StormFilter, used on Site, is a stormwater treatment system using rechargeable, self-cleaning, media-filled cartridges to absorb and retain required level of pollutants from stormwater

runoff including total suspended solids, hydrocarbons, nutrients, soluble heavy metals, and other common pollutants. The filter cartridges treat stormwater through a passive filtration system to remove pollutants. A filter cartridge chamber is proposed within the proposed OSD tank. The southern catchment filter cartridge chamber is 10m x 5.5m and has 13 x 690mm filter cartridges.

A system has been proposed for the control of stormwater on the Site, which considers the requirements for water pollution control and quantity control. The proposed system will result in adequate environmental protection, reduce water pollutant loads based on modelling and satisfy the requirements of Inner West Council. A reduction in peak stormwater runoff can also be expected and we believe the system satisfies the requirements of Sydney Water.

3.3.2. Flooding

An amended Flood Management Plan has been prepared by Richmond + Ross and included at Appendix H. The report has sought to respond to the flooding matters raised by Inner West Council and Environment, Energy and Science Group.

Assessment

It is proposed to collect the flood flow via a network of pit inlets and divert it to an underground flood detention chamber via drainage culverts. The flood detention chamber is proposed with a volume equal to the existing site's above ground 1% AEP flood storage (Approx. 1200m³). Accordingly, there will be no net loss in available flood storage up to the 1% AEP storm event.

The above flood diversion/detention measures expected post development topography and geometry amendments (proposed finished ground level and building extents within the site) were added to the Marrickville Valley Floodplain Risk Management Study. The flood level applicable to the site based on modelling is 4.61mAHD.

Based on the model results, the expected flood depth within the site boundary during a 1% AEP storm event is less than 0.2m and is located around the inlet to the flood diversion structure. The maximum velocity of flow within the site boundary during a 1% AEP storm event is less than 1.05m/s.

The flooding within the site post development is categorised as low hazard during a 1% AEP storm event. The site is subject to low hazard flooding during a PMF event being a reduction in hazard category for the post development scenario.

Mitigation Measures

The following mitigation measures are proposed:

- Flood flow diversion channels and detention chambers and
- Construction of threshold ramps and localized grading to all doorways to RL 4.91mAHD (Floor level being 4.86mAHD)

3.3.3. Acoustic

Acoustic Logic prepared an updated SSDA Acoustic Assessment (Appendix J) and accompanying Response to Submissions (Appendix K) which respond to the feedback from DPIE, Inner West Council and the local community.

This information was provided to DPIE for their preliminary review on 10 August 2021. Feedback from DPIE was provided via emailed correspondence dated 19 August 2021. A further response was prepared by Acoustic Logic dated 31 August 2021 (Appendix L) which addresses the matters raised by DPIE in their preliminary review of the supplementary information.

Assessment

The updated SSDA Acoustic Assessment (dated 1 September 2021) replaces the original SSDA Acoustic Assessment (dated 15 October 2020) which was lodged with the EIS (Appendix Z). The updated report incorporates changes and additions which respond to each of the submissions and the follow up correspondence from DPIE. Each of the changes to the original report is identified within the Response to Submissions (Appendix K) and the Response to the DPIE Queries (Appendix L) and summarised as follows:

- Measured noise levels at residents setback from Edinburgh Road are provided as Table 4-2.

- Further detail regarding operational noise sources and associated noise levels, including night-time activities, and updated modelling of operational noise levels to distinguish between passenger vehicles and delivery vehicles.
- Confirmation of the assessment methodology and compliance with relevant guidelines.
- Revised modelling as shown in the updated 3D views provided as Figures 5 to 12.
- Additional recommended mitigation measures to facilitate compliance with the noise emission requirements of the NSW EPA Noise Policy for Industry.

The updated SSDA Acoustic Assessment concludes the proposal will satisfy the relevant requirements for internal noise levels and external noise emissions criteria, providing the recommended mitigation measures are implemented (refer below).

Mitigation Measures

The recommended mitigation measures to achieve the required indoor noise levels include:

- Glazed windows and doors.
- External roof/ceiling construction.
- External wall construction.

The additional recommended mitigation measures to meet the noise emission requirements include:

- Review and detailed design of mechanical plant prior to issue of a construction certificate (CC).
- Installation of a 1.5 metre high acoustic barrier on the ground floor and Level 1 car parks.
- Acoustic barriers for the Level 2/3 loading docks.
- The driveway between 76 Edinburgh Road and the site (north western façade) not being used for routine site activities.
- Acoustic screening to the office building plant room facades (based on the mechanical services review).
- Medium trucks accessing the site in a westbound direction on Edinburgh Road during the night time period.
- Heavy trucks accessing and leaving the site via Sydney Steel Road/Edinburgh Road during the night time period.
- Treatment of the northern car park pavement to provide for minimum vertical displacement and potential for noise generated by wheel to concrete impacts (ie car tyre squeal).

Each of the above measures has been included within the updated mitigation measures attached as Appendix B.

3.3.4. Traffic and Parking

Colston Budd Rogers & Kafes Pty Ltd (**CBRK**) have prepared an updated Traffic and Access Report (Appendix M) and accompanying correspondence and revised Traffic Control Site (TCS) Plan (Appendix N) which address the issues raised in submissions from TfNSW, Inner West Council, Sydney Metro and the local community.

The CBRK correspondence, TCS Plan and updated SIDRA modelling were provided to DPIE via emailed correspondence on 3 September 2021 to facilitate review by TfNSW. Formal confirmation was sought regarding previous verbal advice provided by TfNSW in a meeting on 30 July 2021 which noted no further information was required and in-principle approval would be provided for the proposed modifications sought at the Edinburgh Road/Smidmore Road/site access traffic signals.

Assessment

The updated Traffic and Access Report (dated January 2021) supersedes the original Traffic and Access Report (dated October 2020) which was lodged with the EIS. The updated report provides clarification regarding heavy vehicle movements and impacts on the surrounding road network. The findings of the

updated assessment have not materially changed from those in the original Traffic and Parking Assessment submitted with the EIS.

The accompanying correspondence prepared by CBRK dated 20 August 2021 responds to the specific matters raised by TfNSW, Inner West Council and DPIE. The final Traffic Control Site Plan which is attached to the CBRK correspondence satisfactorily responds to relevant issues raised by TfNSW and was provided with 'in-principle' support on 21 September 2021.

The updated SIDRA model, incorporating each of the updates requested by TfNSW during their detailed assessment of the proposal, was forwarded under separate cover to TfNSW via DPIE on 3 September 2021. This was also deemed to be satisfactory in the TfNSW response dated 21 September 2021

Mitigation Measures

The proposed mitigation measures which respond to traffic and parking have not changed substantially compared to the original mitigation measures as described within Section 9 of the original EIS dated 19 October 2020. The additional information provided to TfNSW during the assessment of the proposal included vehicle swept paths, clarification of vehicle movements and amended SIDRA modelling to inform the final assessment of the potential impacts, including the proposed modification to the signalised intersection.

The updated Mitigation Measures (Appendix B) include four pick-up spaces to service the drive-through customer pick-up facility. The original general description provided regarding the fourth signalised intersection approach to the Edinburgh Road/Smidmore Street intersection remains as per the original mitigation measures in the EIS. However, an additional notation was included to facilitate the future delivery of the median by others, if required, and accordingly, has been updated to reference the final TCS Plan endorsed by TfNSW.

3.3.5. Hazardous Materials

As per the DPIE's request, RiskCon have prepared an updated SEPP 33 Assessment (Appendix O) in response to the DPIE's request to verify the amount of dangerous goods (DGs) to be stored on the site.

The assessment has considered the quantities of DGs that will be stored at the site and associated vehicle movements. The results of the analysis indicate the threshold quantities for the DGs to be stored and transported are not exceeded and therefore SEPP 33 does not apply to the project.

3.3.6. Fire

First 5 Minutes have prepared a comprehensive Emergency Response Plan (ERP) (Appendix P) in response to Fire & Rescue's submission. The ERP identifies foreseeable on-site and off-site fire events and other emergency incidents and details the appropriate risk control measures that would need to be implemented to safely mitigate potential risks to the health and safety of firefighters and other first responders.

4. RESPONSE TO SUBMISSIONS

This section provides a detailed summary of the Applicant's response to the issues raised in the submissions (refer to Section 2).

4.1. RESPONSE TO DPIE ASSESSMENT

DPIE wrote to the applicant on 30 November 2020 requesting a response to the submissions and matters raised during the public exhibition period for SSD-10468. The comments provided by DPIE required further clarification on the use of heavy vehicles accessing the site, the requirement for an emergency access point, verification of dangerous goods on site, details of an indicative construction timeframe and the final Aboriginal Cultural Heritage Assessment (**ACHAR**).

4.1.1. Heavy Vehicles

DPIE noted a number of submissions received from the public raised concerns regarding heavy vehicles accessing/leaving the site via the north-western section of Edinburgh Road.

DPIE requested consideration be given to restricting truck movements from turning left out of Sydney Steel Road onto Edinburgh Road to avoid impacting upon the residential area to the north-west. Such a restriction could be proposed through the implementation of a Driver Code of Conduct during construction and operation.

Colston Budd Rogers & Kafes Pty Ltd considered the impacts of heavy vehicles accessing and leaving the site via Edinburgh Road from a traffic perspective (refer to Appendix L). They concluded the proposed truck movements are appropriate for the reasons outlined below:

- The number of vehicles delivering to the customer fulfilment centre will be relatively low, at some 15 per day.
- Trucks to and from the site currently use this route.
- Edinburgh Road is intended to serve sites in the industrial area, including the subject site and the adjacent shopping centre, and therefore it is expected that heavy vehicles will utilise this route.
- The previously approved Masters development on the Site permitted left out truck movements onto Edinburgh Road. The current proposal is consistent with this approved arrangement.

Acoustic Logic has undertaken further assessment of the potential acoustic impacts associated with the noise generated by heavy and medium truck movements. The following mitigation measures are recommended to meet the noise emission requirements of the NSW EPA Noise Policy for Industry:

All medium truck movements (returning delivery vans) during the night time period (10pm to 7am) are to return to site via Edinburgh Road in the westbound direction (from the east of the site), away from immediately adjacent residents. That is, returning delivery vans will need to return to site by turning left on to Sydney Steel Road.

All heavy truck movements (deliveries to the site and exiting once unloaded) during the night time period (10pm to 7am) are to access and leave the site via Sydney Steel Road/Edinburgh Road to the east, away from immediately adjacent residents. That is, inbound heavy vehicles will need to turn left into Sydney Steel Road to access the site, and depart Sydney Steel Road via a right hand turn during the night time period.

The above recommendations have been incorporated into the updated mitigation measures (Appendix B).

4.1.2. Emergency Access Point

DPIE noted a number of submissions received from the public raised concerns in relation to the proposed emergency access point and potential impacts to the adjacent residential area during its use. The following additional information is provided with regards to the proposed emergency access point:

- **The justification for a separate emergency access point**

The proposed emergency access point is a mandatory requirement under the National Construction Code (NCC) to allow for continuous access for emergency vehicles from public road around the entire building.

- **The situations and/or scenarios which would trigger the use of the emergency access points**

The emergency access point will be used by emergency vehicles such as fire trucks or ambulances in emergencies only.

- **How access via the north-western driveway would be managed and/or restricted at all other times**

The access point will be secured by a chain and will not be a 'routine entrance or exit point' for customers and heavy vehicles.

4.1.3. Aboriginal Cultural Heritage

A final version of the ACHAR prepared by Urbis is provided at Appendix E. The ACHAR concludes:

- There are no registered Aboriginal objects and/or archaeological sites within the subject area.
- The original landscape is covered by between 0.7–1.3m of imported fill and the ground surface visibility within the subject area is considered zero.
- There are landscape features with potential for Aboriginal objects or archaeological deposits located within the subject area.
- Despite an extensive built environment and drainage modification, the deep nature of the residual underlying sediments indicates there is likely to be some remaining archaeological potential at the site. There is moderate-high archaeological potential for Aboriginal objects in sub-surface contexts where there have not been extensive sub-surface impacts.
- Additional investigation is warranted in the form archaeological monitoring to establish the presence or absence of Aboriginal objects and archaeological resources within the subject area.
- No additional Aboriginal cultural heritage values have been identified by the RAPs.
- The RAPs have expressed their support for the proposed recommendations and additional works.

The following recommendations are proposed during the ongoing design, construction and operation phase:

- **Recommendation 1 – Continued RAP Consultation**

The Proponent should continue to consult with the Aboriginal community regarding the project.

- **Recommendation 2 – Further Archaeological Investigation**

Development of Archaeological Research Design (ARD) and Monitoring/Excavation Methodology (MEM)

Prior to construction subsurface archaeological investigation must be carried out, informed by an Archaeological Research Design (ARD) and Monitoring/Excavation Methodology (MEM), to investigate the identified landscape features and their potential for retaining Aboriginal objects and archaeological resources.

Archaeological Monitoring

Following the approval of the SSDA and parallel with the commencement of earthworks, during the removal of the existing slab and areas of proposed bulk excavation archaeological monitoring should be undertaken to ensure no potential Aboriginal archaeological deposits are harmed during the works.

▪ **Recommendation 3 – Archaeological Chance Find Procedure**

In areas identified as having low potential for archaeological resources and for the construction of pylons, although considered highly unlikely, should any archaeological deposits be uncovered during any site works, a chance find procedure must be implemented.

▪ **Recommendation 4 – Human Remains Procedure**

In the unlikely event that human remains are uncovered during any site works, the following must be undertaken:

- All works within the vicinity of the find immediately stop.
- Site supervisor or other nominated manager must notify the NSW Police and DPC.
- The find must be assessed by the NSW Police, and may include the assistance of a qualified forensic anthropologist.
- Management recommendations are to be formulated by the Police, DPC and site representatives.
- Works are not to recommence until the find has been appropriately managed.

Further discussion regarding the final ACHAR is provided in response to the submission provided by Heritage NSW as discussed in Section 4.2.4. This includes provision for further detailed investigations following the demolition of the existing building and prior to construction of the approved development.

4.1.4. Hazards and Risk

DPIE have requested the amount of dangerous goods (DGs) to be stored on the site are verified, including, but not limited to, Class 2.1 (Aerosols) and Class 8 materials (if any). If SEPP 33 is triggered, the Submissions Report must include a Preliminary Hazard Analysis (PHA), prepared in accordance with *Hazardous Industry Planning Advisory Paper No. 6 – ‘Hazard Analysis’ DoP, 2011*) and ‘Multi-Level Risk Assessment’ (DoP, 2011).

A revised SEPP 33 assessment has been prepared by Riskcon and submitted at Appendix OS. The assessment has considered the quantities of DGs that will be stored at the site and associated vehicle movements. The results of the analysis indicate the threshold quantities for the DGs to be stored and transported are not exceeded and therefore SEPP 33 does not apply to the project.

As the facility is not classified as potentially hazardous, it is not necessary to prepare a Preliminary Hazard Analysis and SEPP 33 does not apply.

4.1.5. Construction Timeframe

A timeline for the construction of the development, including the breakdown of early works, construction and fit out is provided at Appendix QQ.

An indicative timeframe for the various stages involved in the construction of the proposed facility is per below:

- Early works: Five months
- Main works: 17 months
- Integrated fit out and commissioning: 13 months

4.1.6. Noise

A Request for Additional Information was issued by DPIE on 25 January 2021. Each of the matters raised was addressed in an updated SSDA Acoustic Assessment and accompanying Response to Submissions prepared by Acoustic Logic and attached as Appendix J and Appendix K.

These documents were provided to DPIE via emailed correspondence dated 10 August 2021 to facilitate a preliminary review and assessment. DPIE issued emailed correspondence dated 19 August 2021 which provided feedback on the updated report. Acoustic Logic provided supplementary correspondence responding to each of these matters dated 31 August 2021 (Appendix L).

The following table identifies each of the matters raised by DPIE and the responses provided by Acoustic Logic within the updated report and responses attached as Appendices J-L.

Table 3 Response to Acoustic Matters

Comment	Response
Response to Request for Additional Information dated 25 January 2021	
Noise criteria for non-residential receiver types are presented in Table 6-3 of the acoustic report. Noise criteria apply during business hours (i.e. when in use) for commercial and industrial premises. The acoustic report does not provide information on the time of use of nearby non-residential receivers. Please provide clarity around whether operational noise should be assessed at non-residential receivers across all time periods (day, evening and night).	Table 7-5 in the updated SSDA Acoustic Assessment prepared by Acoustic Logic dated 1 September 2021 (Appendix J) shows the relevant noise emission levels are able to be achieved at surrounding commercial/industrial properties during all times of use.
Noise criteria for non-residential receiver types are presented in Table 6-3 of the acoustic report. Noise criteria apply during business hours (i.e. when in use) for commercial and industrial premises. The acoustic report does not provide information on the time of use of nearby non-residential receivers. Please provide clarity around whether operational noise should be assessed at non-residential receivers across all time periods (day, evening and night).	<p>Sections 7.2 and 7.3 of the updated SSDA Acoustic Assessment provide further detail on operational noise sources and associated noise levels.</p> <p>This includes expected truck/vehicle movements in typical operation during all time periods, including between 10pm and 7am. It also includes potential noise emissions from the staff car park and site loading/truck movements during the early morning peak period (5am to 7am).</p>
In addition, assumptions made for carpark noise in Section 7.2 of the acoustic report appear to have only considered passenger vehicles, despite there being two separate parking areas for both passenger vehicles and small rigid trucks.	The northern car park (adjacent to Edinburgh Road) is intended to be used only by passenger vehicles. Parking facilities for home delivery vans are provided at the rear, above the loading docks.
<p>Furthermore, although the Environmental Impact Statement outlines that the proposal seeks to operate 24 hours a day, seven days a week, Section 7.3 of the acoustic report is unclear about the hours of operation and the assumptions made around typical truck movements, which creates uncertainty in the noise management and mitigation measures needed to address night-time noise impacts.</p> <p>Please provide clarity around how vehicle related noise has been modelled, and how the night time noise criteria would be achieved (details and effectiveness of noise management and mitigation measures need to be clearly identified).</p>	<p>Sections 7.2 and 7.3 of the updated SSDA Acoustic Assessment includes further details regarding the proposed/assumed operational scenarios, including night time use of the facilities (10pm to 7am), particularly during the morning peak period (5am to 7am).</p> <p>Section 7.6 states the predicted noise levels can meet the noise emission requirements at all times, including during the night-time period. However, home delivery loading activities are not proposed to occur between 10pm and 5am. Further, medium truck and heavy truck movements are proposed to be restricted during the night-time period, away from adjacent residents.</p>

Comment	Response
<p>Section 7.3 of the acoustic report (Loading Dock and Waste Collection) assumed a single sound power level value of 100 dB(A) to represent noise emissions from a variety of scenarios corresponding to heavy vehicle movements, loading activities and waste collection. The oversimplification of modelling parameters is unlikely to result in accurate operational noise predictions. Further, there is insufficient information in the acoustic report to verify if heavy vehicle movements have been modelled appropriately.</p>	<p>Sections 7.2 and 7.3 of the updated SSDA Acoustic Assessment provide further detail on operational noise sources and associated noise levels.</p> <p>Table 7-1 provides sound power levels for a range of typical automotive movements within the site, including loading dock activities, different types of vehicles moving at varying speeds and directions, engines starting for both cars and trucks., car doors slamming and truck airbrake release.</p> <p>Measurements have been undertaken at an existing facility in St Peters which manufactures and installs refrigeration compressors above the cabin of delivery vans. Woolworths has confirmed the vans will be plugged into external power during loading activities to avoid idling engine noise.</p>
<p>Please clarify the reference source for this assumed sound power level and provide supporting evidence if derived from measurements. The acoustic report must objectively account for acceleration, reversing, materials delivery, handling and processing as separate noise sources in the operational noise model. The acoustic report must also specify the assumed passage speeds for all heavy vehicle manoeuvres.</p>	<p>Section 7.3.1 of the updated SSDA Acoustic Assessment provides the noise levels used in the assessment (refer to Table 7-1 as described above). Modelled noise levels have been based on the US FHWA TNM 2.5 technical model. Measurements of Woolworths delivery trucks and noise data have been obtained from similar developments.</p> <p>Sections 7.2 and 7.3 of the updated SSDA Acoustic Assessment provide further detail on operational noise sources and associated noise levels. The operational noise emissions have been modelled based on the activities proposed across the site, including:</p> <ul style="list-style-type: none"> ▪ Articulated trucks manoeuvring at the south-eastern and south-western loading docks. ▪ Outbound delivery vans (small rigid vehicles) manoeuvring in the upper floor of the south-western loading dock. ▪ Outbound delivery vans (small rigid vehicles) manoeuvring to park above the loading docks. ▪ Staff parking vehicles manoeuvring in the two-storey car park. ▪ Individual plant rooms above the office building and the south-western plant room.

Comment	Response
	<ul style="list-style-type: none"> ▪ Influence of night-time operations on sleep disturbance, including car engines starting and doors slamming <p>Sections 7.3.1 and 7.4 detail the modelling of on-site heavy vehicle movements at 10km/hour and off-site vehicle noise in accordance with the methodology provided in the US FHWA TNM Technical Model 2.5.</p> <p>The modelling of the on-site heavy vehicle movements is described in Table 7-1 of the updated SSDA Acoustic Assessment and as outlined previously within this report. The off-site vehicle noise models the same types of vehicles moving through the local road network and the signalised intersection, including predicted vehicle movements during the day-time and night-time periods and from different directions.</p>
<p>There appears to be no evidence of an objective assessment that demonstrates the modifying factors outlined in Factsheet C of the Noise Policy for Industry (EPA, 2017) have been considered in the acoustic report. The acoustic report needs to include tests for low frequency content, tonality and impulsivity for all assessment time periods as well as the intermittency test for activities undertaken during the night-time period and apply any relevant modifying factors to assess operational noise impacts in accordance with the Noise Policy for Industry.</p>	<p>Section 7.5.1 of the updated SSDA Acoustic Assessment confirms that based on the predicted noise levels at the receivers, modifying factors in Factsheet C of the NPI do not apply in this instance.</p> <p>Further, the NPI does not provide a correction for impulsive noise (like the superseded Industrial Noise Policy).</p>
Response to emailed DPIE correspondence dated 19 August 2021	
<p>The Department notes that the attended and unattended noise levels relied upon in the original assessment were sourced from locations directly adjacent to Edinburgh Road. As was flagged in the Department's email dated 9 March 2021, these locations/levels may not be representative of the existing levels experienced at the most affected receiver and attended noise measurements should be undertaken in the residential area to the north-west to provide supplementary data. Such measurements can be utilised to validate the project noise trigger levels, including the night-time trigger level of L_{Amax} 52 dB(A) or the prevailing rating background level plus 15 dB (whichever is greater). If supplementary noise monitoring data</p>	<p>The updated SSDA Acoustic Assessment includes additional measurements and amended project noise trigger levels in Section 4, Table 4-1 and Section 6.5.</p> <p>Supplementary attended noise measurements were undertaken at two locations (14 Bourne Street and 10 Leicester Street) to compare with simultaneous attended measures at the long term monitoring location (65 Edinburgh Road) to determine the difference in background noise levels between the two locations. This confirmed the residents set back from Edinburgh Road experience a marginally reduced background noise level of 2dB(A).</p>

Comment	Response
<p>cannot be readily obtained due to current COVID restrictions, consideration should be given to designing mitigation measures to reduce predicted noise levels to well below the night-time assessment criteria.</p>	<p>The project noise trigger levels (PNTL) were revised to account for this difference at these locations. The night-time level remained the same, however, the sleep disturbance trigger levels were marginally reduced. The predicted noise levels from the site operations are below the relevant thresholds.</p>
<p>The Department notes the updated noise impact assessment appears to have only considered noise from general movement around the carpark, engine start-up and car door slam events, and is concerned that the assumed L_{Amax} of 96 dB(A) may not be representative of typical noise emission sources in the front carpark. Typical sources include passenger vehicles entering and exiting the carpark, general vehicle movements through the structure, engine start-up, vehicle acceleration, car door slam, vehicles idling, wheel and tyre squeal on concrete and commuter speech. The use of pedestrian crossing beepers by staff at the Edinburgh Road / Smidmore Street intersection may also result in sleep disturbance for nearby residents. The detailed night-time noise assessment should subsequently be updated to address maximum noise levels for all possible activities, the extent to which the maximum noise level would exceed the rating background noise level, and the number of times this happens during the night-time period. Further information should then be provided to clarify:</p> <ul style="list-style-type: none"> ▪ whether surface treatment will be applied to the front carpark to minimise tyre squeal ▪ what additional mitigation and/or management measures are proposed (such as at-property architectural noise treatments, employee training procedures, etc) to address noise impacts if any of the additional noise sources are likely to cause sleep disturbance. 	<p>The maximum sound power level is based on a car door closing, however, this is not the only noise source considered in the assessment.</p> <p>The sound power levels and assumptions include each of the noise sources expected in association with the car park, including vehicles entering and existing, acceleration and deceleration/idling of passenger vehicles. It is not expected there would be significant acceleration based on the low speeds in the car park and the ramp to the upper levels is located on the eastern boundary, away from the residential receivers.</p> <p>Tables 7-3 and 7-4 identify the maximum predicted noise levels at nearby residential receivers which are below the sleep disturbance emergence levels.</p> <p>The pedestrian beacon was measured on 7 September 2021 to determine the potential impact of the pedestrian crossing on the closest resident at 65 Edinburgh Road, including both the noise associated with pressing the button and the right of way noise. The noise was only partially audible at the boundary of the residential receiver due to the background noise levels. The corrected noise level at the nearest window was below the minimum recommended sleep disturbance trigger level.</p> <p>Vocal noise from the car park is not expected to be significant based on its expected use and associated sound power levels. The mitigation measures in Section 7.6 include additional recommendations to minimise tyre squeal.</p>
<p>According to EPA guidelines, a time-varying noise is considered intermittent when the noise level or loudness changes regularly by a noticeable amount. The updated noise impact assessment claims that intermittent penalty is not warranted based on the predicted noise levels. However, according to Table 7-3 (L_{Aeq,15min} and L_{Amax} levels for R1) and Table 7-4 (L_{Aeq,15min} and</p>	<p>The Acoustic Logic correspondence responding to the DPIE queries (Appendix L) confirms the noise assessment is consistent with EPA discussions regarding the intermittency penalty. Updated commentary has also been provided to demonstrate the noise impact assessment has been prepared in accordance with relevant</p>

Comment	Response
<p>L_{Amax} levels for R2) of the updated noise impact assessment, it can be deduced that the difference between minimum and maximum sound pressure levels over the worst-case 15-minute period would be substantially greater than 5 dB(A). This deduction is on the basis that the difference between L_{Amax} and L_{Aeq,15min} levels is already 5 dB(A) at these most-affected receiver locations. Based on the above, the Department considers the application of a +5 dB modifying correction for intermittent noise to be warranted. The Department's view is supported by the ISO1996-1:2016 on description, measurement and assessment of environmental noise and EPA's draft Noise Guide for Local Government for which motor vehicle noise under conditions of small traffic volume is exemplified as being a source of intermittent noise. Further, the WHO notes that the intermittency of a time-varying sound can be determined by quantifying the number of noise events as well as examining the difference between the maximum sound level and background sound level. Noise management and mitigation measures for night-time operations should be designed with a goal of minimising specific noise characteristics according to the Noise Policy for industry. The Department requires a feasible and reasonable mitigation decision-making matrix be included within the updated noise impact assessment in line with the advice provided in Section 3.4 of the Noise Policy for Industry.</p>	<p>guidelines and criteria, including ISO 1996-1:2016 and the draft Noise Guide for Local Government.</p> <p>The provisions of the Night Noise Guidelines for Europe have been addressed in response to the feedback on the number of events and the comparison between the maximum and backgrounds noise levels. The assessment concludes the mitigation measures to the northern car park (barrier screening) will enable the relevant noise levels to be achieved.</p> <p>Based on the above, it is considered a decision making matrix is not required.</p>
<p>Maximum noise events have been assumed to only emanate from two locations within the front staff carpark, as shown in the figure below. Please clarify how these locations were chosen and justify why they represent a worst-case assessment of maximum noise events within the carpark (noting that some parking spots in the north western corner of the carpark may maintain line-of-sight to the dwelling at 2 Bourne Street (R1) even with the proposed acoustic barriers).</p>	<p>Acoustic Logic has confirmed the Peak/L_{max} events have been considered across the frontage of the car park as well as the rear loading dock, rather than the two locations which were initially considered to provide the 'worst case' noise levels.</p> <p>The predicted noise levels in Tables 7-3 and 7-4 present the maximum noise levels from these activities. Item 6 in Section 7.2 confirms the locations have been modelled for all car spaces along the boundary of the car park. Figure 3 has also been updated to include the individual L_{max} events.</p>
<p>The Department also has the following minor comments in relation to the remainder of the updated noise assessment:</p>	<p>Each of the listed items has been updated within the SSDA Acoustic Assessment report attached as Appendix K and as summarised below:</p>

Comment	Response
<ul style="list-style-type: none"> The colour scale used on figures 4 to 11 varies slightly. Please update these figures to maintain a consistent colour scale. Figures 4 and 9 show a large building on the Sydney Metro site, which was demolished in early 2020. Please update these figures accordingly. It is unclear why LA_{max} noise levels are the same for both R1 and R2 (as outlined in Table 7-3 and Table 7-4) when the LA_{eq} noise levels are different for both locations. If necessary (noting the Department's comments above may change the predicted levels), please update the assessment to clarify why this is the case. It is noted that the Acoustic Assessment recommends the installation of 1.5 metre-high noise barriers for the ground and first floors of the front carpark. Please provide elevations for the proposed barriers, so that the Department can understand their potential visual impact. 	<ul style="list-style-type: none"> Figures 4 and 5 provide overall grid noise maps for the site and demonstrate noise propagation from the site over differing areas. A more restricted colour scale would not provide sufficient detail to describe the predicted noise levels in Figure 4. A more detailed map of noise contours for residents to the north (being the closest residential receivers) is provided in Figure 5. Figures 6 to 11 (which show the façade noise maps of noise emissions from the site) provide a consistent colour scale, as well as providing numerical predicted noise levels at various façade elevations. Figures 4 to 12 have been updated to reflect the change to the Sydney Metro site. Figure 5 in the SSD Acoustic Assessment report shows the noise contribution to residents at location R1 and R2. Peak noise impacts are primarily from the northern car park for both receivers. The peak noise level at the resident is determined primarily by distance so a higher noise level is emitted to R2 based on its proximity. The architectural drawings (Appendix C) include the proposed barriers. Acoustic Logic has confirmed these are consistent with their recommendation.

4.2. RESPONSE TO PUBLIC AUTHORITY SUBMISSIONS

A response to the matters raised by government agencies and other public authorities in relation to SSD 10468 is provided below.

4.2.1. Environment, Energy and Science Group

Table 4 Response to Biodiversity and Conservation Division Submission

Comment	Response
Biodiversity A Biodiversity Development Assessment Report Waiver Request was approved on 22 June 2020	Noted. No response required.
Flooding The development site has flood affectation under baseline conditions under a 50% AEP Event. The modelling results from the flood management plan	A comprehensive emergency response flood management plan has been prepared by Richmond + Ross and included at Appendix H. Richmond + Ross have consulted with the SES. Please refer to

Comment	Response
<p>report (Appendix W of the Environment Impact Statement (EIS)) have been compared with the Council's flood study and floodplain risk management study and plan. The assessment is found to be satisfactory since the models of the previous studies have been adopted as the base models for the flood management plan report.</p> <p>The evacuation plan proposed in the Marrickville Valley Floodplain Risk Management Study and Plan would be suitable for the development site as indicated in the flood management plan report (Appendix W of the EIS).</p> <p>The proponent will need to prepare a comprehensive emergency response management plan for the development site in consultation with the NSW SES and Council to protect workers and visitors at the site from being exposed to flooding hazards during major and rarer flood events. Please note from 1 July 2020 Aboriginal cultural heritage regulation, including advice regarding SSIs and SSDs, is now managed Heritage NSW. The new contact for the ACH regulation team is heritagemailbox@environment.nsw.gov.au.</p>	<p>correspondence letter in Appendix D of the Flood Management Plan.</p>

4.2.2. Transport for NSW

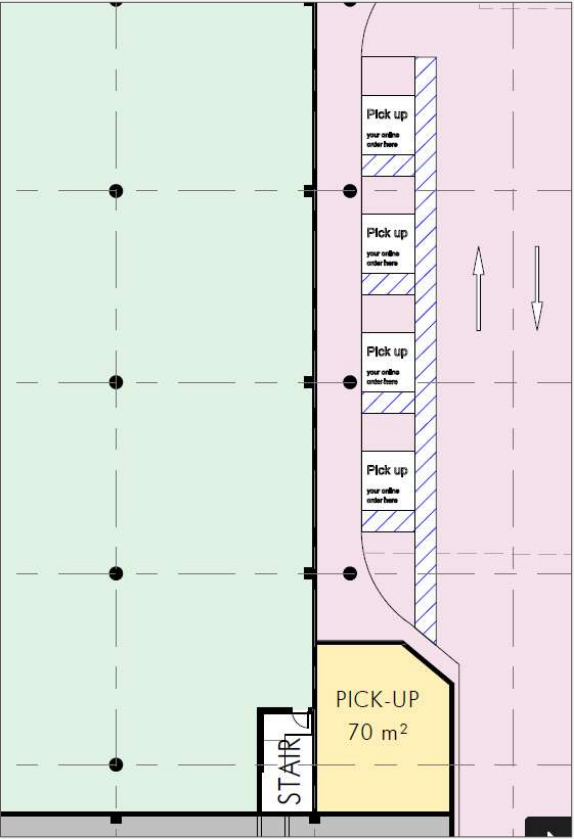
Table 5 Response to Transport for NSW Submissions dated 18 November 2020, 28 January 2021, 1 March 2021, 19 March 2021, 25 May 2021 and 14 July 2021

Comment	Response
Response to submission dated 18 November 2020	
<p>TfNSW notes that the site has development consent for a home improvement centre (DA 2015/00168). The current application seeks to maintain similar vehicular access arrangements; however the network conditions have changed during this period.</p> <p>TfNSW requires:</p> <ul style="list-style-type: none"> ▪ Electronic copy of the SIDRA modelling data, which includes current and future use of the intersection layout; and ▪ Swept path analysis for the turning movements proposed with the largest size vehicle with all 	<p>An electronic copy of the SIDRA files was provided to DPIE on 22 December 2020. The model has since been updated on various occasions, with a final version submitted to TfNSW on 3 September 2021. Swept paths are provided within the updated Traffic and Access Report attached as Appendix N.</p> <p>CBRK confirmed the SIDRA modelling took into account the redeveloped shopping centre, as was required in association with the previously approved Masters Home Improvement Centre development at the site.</p> <p>Correspondence was issued on 21 September 2021 confirming TfNSW were satisfied with the submitted information and providing 'in-principle' support with</p>

Comment	Response
<p>movements at the proposed additional leg of the intersection.</p> <p>TfNSW will need to review the modelling and swept paths to provide 'in-principle' agreement and approval under Section 87 of the Roads Act 1993. If 'in-principle' approval is agreed by TfNSW, formal approval under Section 87 of the Roads Act 1993, will be required.</p>	<p>the concept TCS plan to support the proposed development.</p>
<p>Transport Impact Assessment</p> <p>Limited details regarding changes to TCS phasing at the intersection of Smidmore Street / Edinburgh Road have been provided.</p>	<p>The original traffic response dated 17 December 2020 confirmed the intersection would operate with diamond phasing on Edinburgh Road and conventional phasing on the other approaches (Smidmore Street and the proposed site access). A draft signal plan was also attached. Signalised intersections are generally configured with the flexibility to operate in a variety of phases, depending on traffic demands.</p> <p>The consolidated traffic response dated 20 August 2021 (Appendix N) included a final TCS Plan which was resolved through ongoing consultation with TfNSW and updated SIDRA modelling undertaken throughout the assessment of the proposal. An electronic copy of the SIDRA analysis was provided to TfNSW on 3 September 2021. TfNSW subsequently confirmed they were satisfied with the submitted information and provided 'in-principle' support with the concept TCS plan.</p>
<p>A revised TIA, as part of the Response to Submissions (RtS), should be provided with inclusion of SIDRA modelling of the subject signalised intersection, specifically in relation to concerns regarding vehicle queuing along Edinburgh Road between Smidmore Street and Sydney Steel Road. The report should identify effects of the signal phasing and proposed signal capacity the aforementioned leg of the intersection up to the roundabout including operation in the analysis.</p>	<p>A revised TIA has been prepared by CBRK and submitted as Appendix M.</p>
<p>An electronic copy of the findings should be submitted to TfNSW for review and verification as part of the RtS.</p>	<p>Electronic copies of the updated SIDRA analysis were provided to DPIE on 22 December 2020.</p> <p>A final copy, incorporating all subsequent changes requested by TfNSW, was provided to DPIE on 3 September 2021. 'In-principle' support was provided by TfNSW on 21 September 2021</p>

Comment	Response
<p>TfNSW advises that 'in-principle' support is given to the right-hand movement and creation of diamond phase is supported, subject to being supported by the modelling and capacity to be accommodated.</p>	<p>CBRK analysis showed queues on Edinburgh Road, between the site access and the roundabout at Sydney Steel Road, would be up to some 35 to 40 metres during peak periods. The distance between the intersections is some 70 metres and therefore these queues will be readily accommodated.</p> <p>At the most recent meeting on 30 July 2021, TfNSW advised no further information was required and approval-in-principle would be given for the modifications sought at the Edinburgh Road/Smidmore Road/site access traffic signals. This was received on 21 September 2021.</p>
<p>Section 3.20 states that "Deliveries to the customer fulfilment centre will be made by semi-trailers up to 20 metres long".</p> <p>TfNSW questions the suitability of the local road network to accommodate for such vehicles. The proponent is to clarify on the maximum size vehicle to be utilised by the site and the route path proposed, to ensure that it can be accommodated on the network. It should be noted that Bedwin Road Bridge has limited structural capacity which should be considered as part of the response and proposed changes to any of the existing freight routes.</p>	<p>CBRK advised the local road network is suitable for the proposed vehicles for the reasons outlined below:</p> <ul style="list-style-type: none"> ▪ the site currently has semi-trailers accessing it; ▪ the site is in a major industrial area which currently caters for these vehicles; ▪ the shopping centre across the road has access by semi-trailers; and ▪ the site has approval for access by semi-trailers in association with the Masters Home Improvement Centre. <p>Roads which would be used by semi-trailers to access the development would include Bedwin Road, Victoria Road, Edinburgh Road and Sydney Steel Road. CBRK is unaware of any structural constraints with regards to Bedwin Road. However, access to and from the site by all vehicles would be subject to existing restrictions. No changes are proposed in this regard.</p>
<p>No reason is provided in Section 3.18 of the TIA as to why there is proposed separate access for emergency vehicles via Edinburgh Road. The proponent is to clarify the reasoning and management details of this separated access arrangement</p>	<p>The proposed emergency access point is a mandatory requirement under the National Construction Code to allow for continuous access for emergency vehicles from public road around the entire building.</p> <p>The emergency access point will be used by emergency vehicles such as fire trucks or ambulances in emergencies only. The access point will be controlled by a chain and will not be a</p>

Comment	Response
	<p>'routine entrance or exit point' for customers and heavy vehicles.</p>
<p>The TIA has limited detail regarding the use of point-to-point vehicles to the site, particularly for online orders that may be collected by third parties (other than the customer). The proponent is to clarify how point-to-point vehicles will operate to the site and provide details on how they will be managed.</p>	<p>Woolworths has confirmed the dedicated pick-up facility will predominantly be used by business customers; however, it may also be used by domestic customers. Customers who have pre-ordered and paid for their groceries via the Woolworths online portal can elect to 'Pick-Up' their order at any locations within the Woolworths 'Pick-Up' location network. The customers prepare a shopping list, pay for the grocery items online and nominate a pick-up time. The order is then sorted to their requirements and conveyed to a temperature controlled 'Pick-Up' facility for the customer to collect.</p> <p>As noted in the Traffic Impact Assessment, vehicles operating to and from the site will include:</p> <ul style="list-style-type: none"> ▪ deliveries to customers' homes from online orders (refer to paragraphs 3.2, 3.18 3.20, 3.24 of TIA) ▪ deliveries to replenish the customer fulfilment centre (refer to paragraphs 3.3, 3.18, 3.20 of TIA); ▪ employees (refer to paragraphs 3.3, 3.16, 3.18 of TIA); and ▪ Customers or others picking up online orders directly (paragraphs 3.2, 3.22, 3.23 of TIA). These vehicles will use the pick-up facility located on the ground floor (see plan extract below).

Comment	Response
	 <p>The diagram is a site plan. On the left is a large green rectangular area. To its right is a yellow rectangular area labeled 'PICK-UP 70 m²'. Further right is a pink area containing four rectangular zones, each labeled 'Pick up your online order here'. A staircase is indicated by a line and the word 'STAIRS' at the bottom left of the pink area. Arrows in the pink area indicate traffic flow.</p>
<p>TfNSW has reviewed the internal swept paths for the site and notes that the semi-trailer movement (Sheet 9 in the TIA) is only illustrating the end docking space being utilised. For the other seven loading dock spaces to be utilised, TfNSW believes that the movements may encroach on the car parking spaces.</p> <p>The proponent is to review the swept path of all semi-trailer movements to ensure that the vehicles can operate without impacting the proposed car parking areas.</p>	<p>The western-most dock was included as this is the most constrained in terms of manoeuvring area. Semi-trailers will be able to access all docks.</p>
<p>The TIA has limited analysis on the use of bicycles for deliveries and whether the proponent has considered this mode of transport for its operations, third party deliveries and / or customer pick-ups.</p> <p>The proponent is to review the use of bicycles for deliveries and whether it should be incorporated into the design of the site.</p>	<p>It is not proposed to use bicycles for deliveries. Appropriate bicycle parking is proposed for the site for employees.</p>

Comment	Response
<p>Section 3.15 indicates that end of trip facilities will be provided, however provides no detail as to the number and whether it will be sufficient to encourage active transport to the site.</p> <p>Clarification on the proposed number of end-of-trip facilities is required to ensure that there is adequate provision to support and encourage active transport.</p>	<p>Six showers and approximately 40 lockers will be provided.</p>
Response to submission dated 28 January 2021	
<ul style="list-style-type: none"> ▪ Pedestrian protection should be included in the SIDRA model; ▪ SIDRA model includes the traffic generation from the recently completed Marrickville Metro Shopping Centre redevelopment; ▪ The proponent details the methodology of calibration and how the SIDRA base model accurately reflects the existing network conditions; and ▪ Signal timing phase splits and cycle lengths should be confirmed with scats.traffic.signal.data@transport.nsw.gov.au 	<ul style="list-style-type: none"> ▪ The SIDRA modelling was updated to hold traffic at the start of each pedestrian phase. Electronic copies of the final modelling were provided to DPIE on 3 September 2021. ▪ The final SIDRA modelling includes traffic from the shopping centre extensions for the afternoon peak hour. During the morning peak hour, shopping centre traffic flows would not significantly change <p>With traffic from the shopping centre extensions, the intersection of Edinburgh Road with Smidmore Street and the proposed site access would operate with average delays of less than 35 seconds per vehicle during peak periods. This represents level of service C, a satisfactory Level of Service.</p> <ul style="list-style-type: none"> ▪ Regarding the third bullet point, the TIA submitted with the EIS noted that the intersection of Edinburgh Road/Smidmore Street operates with average delays of less than 28 seconds per vehicle during peak periods. This represents Level of Service B, a good level of service. This accords with site observations made during site inspections in several peak periods. Traffic queues were consistent with those reported in the SIDRA model. <p>However, CBRK note that future conditions at this intersection will change with the introduction of a fourth signalised approach. It is expected that parameters for the operation of the intersection would change, as appropriate, to optimise its performance with the additional approach.</p> <ul style="list-style-type: none"> ▪ With regards to the fourth bullet point, cycle times were measured on site and included in

Comment	Response
	<p>the SIDRA model. However, CBRK note that signalised intersections can operate within a range of cycle times, depending on traffic demands. The SIDRA model includes this flexibility.</p>
<p>In addition to the above, TfNSW is concerned regarding the complexity of the proposed signalised intersection to include additional phases that would result in queues extending back towards Edinburgh Road / Sydney Steel Road. As such, TfNSW the proposed right turn movement from the west is to be prohibited to mitigate impacts on the surrounding road network and the site would be able to access from the western approach via a roundabout past the site.</p>	<p>CBRK has advised restricting the right hand turn from Edinburgh Road into the site:</p> <ul style="list-style-type: none"> ▪ would increase the number of vehicles queuing on Edinburgh Road westbound between Smidmore Street and Sydney Steel Road, as traffic from the east would need to use the Sydney Steel Road roundabout to turn around; ▪ would not be desirable from a development perspective. Providing for right turn access to the site from Edinburgh Road is a significant reason for providing signalised access to the site; ▪ is not required for capacity or queuing reasons. As noted above, the intersection would operate at a satisfactory Level of Service (level of service C) during peak periods. Queues on Edinburgh Road will be accommodated; and ▪ is not consistent with previous TfNSW advice for this site (18 November 2020) or for the approved development in 2015.
<p>Consideration should also be given to constructing a central median between the leg of Edinburgh Road / Smidmore Street and Edinburgh Road / Sydney Steel Road for improved safety and efficiency outcomes.</p>	<p>The median in Edinburgh Road was previously required in association with the redevelopment of Marrickville Metro. The updated TCS Plan includes provision for the median to be constructed by others, as requested by TfNSW in subsequent discussions. 'In-principle' support for the concept TCS plan was provided by TfNSW on 21 September 2021.</p>
<p>Response to submission dated 1 March 2021</p>	
<p>In Section 3.28 of the Traffic Impact Assessment (TIA) report, it mentions that the proposed development would generate 270 veh/hr during peak periods however, the additional traffic volumes proposed into and out of the development doesn't seem to meet this additional demand. Please clarify.</p>	<p>Additional development traffic flows were provided which shows the 270 vehicles per hour comprises:</p> <p>AM peak hour:</p> <ul style="list-style-type: none"> ▪ 130 vehicles entering (comprising 20, 50 and 20 vehicles turning left, right and travelling straight through the new signalised access, plus 25 and 15 vehicles turning left and right into Sydney Steel Road); plus

Comment	Response
	<ul style="list-style-type: none"> 140 vehicles exiting (comprising 15, 10 and 15 turning left, through and right from the new signalised access, plus 50 and 50 vehicles turning left and right from Sydney Steel Road). <p>PM peak hour:</p> <ul style="list-style-type: none"> 120 vehicles entering (comprising 30, 30 and 10 vehicles turning left, right and travelling straight through into the new signalised access, plus 25 and 25 vehicles turning left and right into Sydney Steel Road); plus 150 vehicles exiting (comprising 50, 20 and 50 turning left, through and right from the new signalised access, plus 15 and 15 vehicles turning left and right from Sydney Steel Road).
A network model is required if modelling 2 or more sites that will be interacting with each other.	The final SIDRA model provided to DPIE on 3 September 2021 is a network model.
Pedestrian protection is not included in the SIDRA model. Please amend SIDRA model to include extended pedestrian protection for all approaches.	The final SIDRA model provided to DPIE on 3 September 2021 satisfactorily addresses this issue.
SIDRA is under calculating pedestrian crossing distance due to incorrect lane widths. Pedestrian crossings should be approximately 19m and 5m. Lane widths can be adjusted or crossing distance inputted manually.	The final SIDRA model provided to DPIE on 3 September 2021 satisfactorily addresses this issue.
Please review the traffic volume inputs – e.g. traffic volume input for Edinburgh Rd (PM Existing) does not reflect the ones shown in Figure 3. Model used 675 whereas Figure 3 shows 355.	The final SIDRA model provided to DPIE on 3 September 2021 satisfactorily addresses this issue.
While the 100 seconds cycle length reflects current site operations, after calibration please test model for the 120sec cycle time.	The final SIDRA model provided to DPIE on 3 September 2021 satisfactorily addresses this issue.
In general, Network Operations has no objections to the proposed phasing. The proposed TCS design plan will be reviewed further in detail later during the formal design review stage.	The final SIDRA model provided to DPIE on 3 September 2021 satisfactorily addresses this issue.
Approach cruise and exit speeds should be adjusted accordingly (considering 40km/h school zone).	The closest school zone is on Edgeware Road, north of Darley Street. The school zone does not affect the intersections assessed regarding the potential impacts of the proposed development. CBRK note the original comment from TfNSW

Comment	Response
	regarding school zones stemmed from another Woolworths project on Barden Ridge.
<p>There are a number of discrepancies with the SIDRA modelling layout compared to existing site conditions and proposed TCS design plan. Please clarify / consider the following:</p> <p>Layout shows 190m on departure side of Edinburgh Rd (western leg). There is currently an existing bus stop and parking approximately 100m west of this intersection.</p>	<p>CBRK have noted the bus stop is not occupied most of the time and will have little effect on the operation of the intersection.</p>
<p>Layout shows 190m kerb side lane on the western approach of Edinburgh Rd. There is currently a concrete traffic calming device, parking and bus stop approximately 70m west of the intersection.</p> <p>Layout shows 65m kerb side lane on eastern approach of Edinburgh Rd. Proposed TCS design plan shows approx. 40m.</p> <p>Layout shows kerb side lane is 30m long with continuous right turn bay. Proposed TCS design plan shows right turn bay is 53m long and continuous kerb side lane.</p> <p>Layout shows 65m on departure side of Edinburgh Rd (eastern leg). Proposed TCS design shows 50m on departure side.</p> <p>Layout shows dedicate right turn bay on Site Access. Proposed TCS design plan shows shared through and right lane.</p>	<p>The final SIDRA model provided to DPIE on 3 September 2021 satisfactorily addresses these matters.</p>
<p>The approach distance between Old Illawarra and Driscoll Place should be 120m?</p>	<p>This comment does not appear to relate to this project.</p>
<p>Once the above are considered /clarified and SIDRA modelling amended, are the proposed right turn bays sufficient to accommodate the projected traffic volumes?</p>	<p>The proposed right turn bays turning into Smidmore Street and the site are some 50 metres long. The queue lengths estimated by SIDRA are some two to three vehicles which will therefore be accommodated.</p>
<p>In regard to the TCS design plan file name "VV3769_XA_R3" – the right turn bay arrangement will cause significant confusion to motorists and is a major safety concern particularly when a vehicle wants to turn right into the driveway and the vehicles behind wants to turn at the signals. This would cause frequent lane changing with a very short distance, resulting in potential increase in</p>	<p>This matter relates to whether or not a median is provided in Edinburgh Road which has previously been addressed. The final TCS plan was endorsed by TfNSW on 21 September 2021. This plan provided for the median to be constructed by others, if required.</p>

Comment	Response
<p>side swipes and rear ends. This proposed right turn bay layout would require two separate right turn bays and within a short distance of less than 50m, it is not possible and is considered unsafe and extremely inefficient</p>	
<p>As previously advised, TfNSW is concerned regarding the complexity of the proposed signalised intersection to include additional phases that would result in queues extending back towards Edinburgh Road / Sydney Steel Road. As such, TfNSW the proposed right turn movement from the west is to be prohibited to mitigate impacts on the surrounding network and the site would be able to access from the western approach via a roundabout past the site.</p>	<p>The original response to the TfNSW submission dated 28 January 2021 confirmed the intersection had been modelled to operate with diamond phasing on Edinburgh Road and conventional phasing on Smidmore Street and the site access. This is typical of many intersections across Sydney.</p> <p>The final consolidated responses submitted with this report (Appendix N) confirms at the most recent meeting with TfNSW on 30 July 2021, it was confirmed no further information was required and that approval-in-principle would be given for the modifications sought at the Edinburgh Road/Smidmore Road/site access traffic signals. This was provided by TfNSW on 21 September 2021.</p>
<p>Consideration should also be given to constructing a central median between the leg of Edinburgh Road / Smidmore Street and Edinburgh Road / Sydney Steel Road for improved safety and efficiency outcomes.</p>	<p>The final TCS Plan includes the median and notes that it will be constructed by others, if required. The concept TCS plan was provided 'in-principle' support from TfNSW on 21 September 2021.</p>
<p>Response to submission dated 19 March 2021</p>	
<p>In Section 3.28 of the Traffic Impact Assessment (TIA) report, it mentions that the proposed development would generate 270 veh/hr during peak periods however, the additional traffic volumes proposed into and out of the development doesn't seem to meet this additional demand. Please clarify.</p> <p>Confirmed that 270veh/hr modelled (combined the traffic volumes entering and exiting the two access points on Edinburgh Rd – Smidmore St and Sydney Steel Rd and it meets the forecasted 270veh/h). Clarification on how trips were distributed during peak periods as typically, there are more vehicles entering than exiting during the AM peak.</p>	<p>There are more vehicles exiting during the morning peak for the following reasons:</p> <ul style="list-style-type: none"> the online fulfilment facility will not have shift changes during the morning on-road peak hour. A shift change will occur earlier, around 5:00 or 6:00am; during the morning peak period, small delivery trucks will be exiting the facility, and returning in the early afternoon; and the office component and other industrial warehouse will have a greater proportion of inbound traffic (employees) during the morning peak hour. However, these are smaller components of the development. Overall, during

Comment	Response
	the morning peak hour, there will be slightly more outbound traffic than inbound.
<p>Pedestrian protection is not included in the SIDRA model. Please amend SIDRA model to include extended pedestrian protection for all approaches.</p> <p>Typically, minimum pedestrian protection provided is 6 secs. I note that the concept traffic signal design plan indicates that extended ped protection is provided for both crossings across Edinburgh Rd and the crossing across Smidmore St. SIDRA modelling is to be amended to reflect the existing pedestrian protection provided (can be obtained through SCATS) and the proposed pedestrian protection as shown in the TSD plan provided for the Edinburgh Rd/Smidmore St intersection.</p>	<p>Times measured on site were some five seconds. The SIDRA model includes pedestrian protection for six seconds.</p>
<p>Also there are a number of discrepancies with the SIDRA modelling layout compared to existing site conditions and proposed TCS design plan. Please clarify / consider the following:</p> <ul style="list-style-type: none"> ▪ Layout shows 65m kerb side lane on eastern approach of Edinburgh Rd. Proposed TCS design plan shows approx.. 40m. – Could you please check TCS 3769 bay lengths. It appears they are the wrong way around. ▪ Layout shows 65m on departure side of Edinburgh Rd (eastern leg). Proposed TCS design shows 50m on departure side – Could you please check TCS 3769 bay lengths. It appears they are the wrong way around. 	<p>The final SIDRA model provided to DPIE on 3 September 2021 satisfactorily addresses these matters.</p>
<p>Once the above are considered / clarified and SIDRA modelling amended, are the proposed right turn bays sufficient to accommodate the projected traffic volumes? – Needs to be checked against 100%ile queue, following amendments of the SIDRA model.</p>	<p>The proposed right turn bays into Smidmore Street and the subject site are some 50 metres long. The queue lengths estimated by the SIDRA model are some two to three vehicles which will therefore be accommodated.</p>
<p>In regard to the TCS design plan file name “VV3769_XA_R3” – the right turn bay arrangement will cause significant confusion to motorists and is a major safety concern particularly when a vehicle wants to turn right into the driveway and the vehicles behind wants to turn at the signals. This would cause frequent lane changing with a very short distance, resulting in potential increase in side swipes and rear ends. This proposed right</p>	<p>The final TCS Plan includes the median and notes that it will be constructed by others, if required. This plan was provided ‘in-principle’ support from TfNSW on 21 September 2021.</p>

Comment	Response
<p>turn bay layout would require two separate right turn bays and within a short distance of less than 50m, it is not possible and is considered unsafe and extremely inefficient. The safety concerns outlined above have not been addressed.</p>	
<p>Consideration should also be given to constructing a central median between the leg of Edinburgh Road / Sidmore Street and Edinburgh Road / Sydney Steel Road for improved safety and efficiency outcomes.</p> <p>TfNSW highlighting needs for extension of the concrete median particularly at Edinburgh Rd/Smidmore St intersection to address safety concerns for the right turn bay movements.</p>	<p>The final TCS Plan includes the median and notes that it will be constructed by others, if required. This plan was provided 'in-principle' support from TfNSW on 21 September 2021.</p>
<p>Concerns raised are related to the close proximity of the roundabout at the intersection of Edinburgh Rd/Sydney Steel Rd to the existing traffic signals Edinburgh Road and Smidmore St" Marrickville (TCS 3769).</p> <p>The roundabout is approximately 80m from the existing signal and this may cause the roundabout to effect the safe operation of the signals, due to the queuing of traffic from the roundabout, as minor movement tend to control the roundabout.</p> <p>Please note that this was previously raised by TfNSW at the meeting with developer and Council.</p>	<p>As discussed at the meeting on 29 March 2021 with TfNSW, the roundabout at Edinburgh Road/Sydney Steel Road is not proposed by Woolworths in association with the subject development. It has previously been approved in association with the Marrickville Metro extension works.</p>
<p>Discrepancy in phasing between the proposed TCS design plan and SIDRA model for Edinburgh and Smidmore St intersection. Note that proposed TCS design plan has 5 phases whereas SIDRA model shows 7 phases. Please clarify. Based on the phasing provided in the TCS design plan, the site in future will operate the following phase sequence: A, D, E, A. Please amend modelling to reflect this.</p>	<p>The final SIDRA model provided to DPIE on 3 September 2021 satisfactorily addresses these matters.</p>
<p>No details have been provided regarding the methodology of calibration and how the SIDRA base model accurately reflects the existing network conditions. A review of the SIDRA model shows default values have been adopted for saturation flow which may be acceptable. However, no evidence has been provided in their report of site observation inputs, which is required for calibration purposes, so it can be assumed that the base case</p>	<p>Calibration of the SIDRA model has been undertaken based on recorded phase and cycle times measured on the site. CBRK note that signalised intersections can operate within a range of cycle times, depending on traffic demands. The SIDRA model includes this flexibility. The SIDRA outputs accord with site observations made during several site inspections.</p>

Comment	Response
<p>saturation flows may not reflect the existing situation at the site.</p> <p>There are several input parameters, performance measures and calibration requirements described in the SIDRA user Guide, Section 2.6.2 – 2.6.4 which are to be followed. The SIDRA analysis report should be structured to TfNSW's Traffic Modelling Guidelines, and the SIDRA User Guidelines should be referred to for calibration methods.</p>	<p>Adjustments to the measured phase and cycle times include those requested by TfNSW in previous correspondence, and those noted above.</p>
<p>The development should be able to operate without affecting the intersection's Level of Service (LoS). Assuming the analysis provided has been calibrated, the impacts shown in the SIDRA model at the intersection of Edinburgh Road and Smidmore Street has worsened from LoS A to LoS B in the AM peak and from LoS B to LoS C in the PM peak. The applicant should be aware that a deterioration to the LoS is not acceptable and that further works are required to maintain the existing level of service.</p>	<p>CBRK do not consider this to be an appropriate test for the following reasons:</p> <ul style="list-style-type: none"> ▪ an additional signalised approach is being introduced at the intersection; ▪ additional capacity and turning lanes are proposed on Edinburgh Road; ▪ the intersection would operate at a satisfactory level of service with the proposed changes; and ▪ this is not the test applied to the previously approved development on the site, which included a very similar intersection arrangement.
<p>As previously advised, the proposed right turn movement from the west is to be prohibited to mitigate impacts on the surrounding network. The site can instead be accessed from the western approach via a roundabout past the site.</p>	<p>CBRK note that restricting the right hand turn from Edinburgh Road into the site:</p> <ul style="list-style-type: none"> ▪ would increase the number of vehicles queuing on Edinburgh Road westbound between Smidmore Street and Sydney Steel Road, as traffic from the east would need to use the Sydney Steel Road roundabout to turn around; ▪ would not be desirable from a development perspective. Providing for right turn access to the site from Edinburgh Road is a significant reason for providing signalised access to the site; ▪ is not required for capacity or queuing reasons. As noted above, the intersection would operate at a satisfactory level of service (level of service C) during peak periods; and

Comment	Response
	<ul style="list-style-type: none"> is not consistent with previous TfNSW advice for this site (18 November 2020) or for the approved development in 2015.
<p>It has been noted that the SIDRA model has the right turn modelled as a filter movement with one adjacent through-lane, and a short length left and through lane. In the event that the eastbound right turn queues out of the bay and left turning vehicles are stationary to give way to pedestrians, the through movement fails to operate. This compromises the effective and ongoing operation and function of Edinburgh Road (SR 2072) as a Classified Secondary road.</p>	<p>As discussed above, the proposed right turn bays turning into Smidmore Street and the site are some 50 metres long. The queue lengths estimated by SIDRA are some two to three vehicles which will readily be accommodated. CBRK also note that Edinburgh Road is not a classified road.</p>
<p>The distribution of trips to the proposed development is based on assumptions, with the generations based on surveys of quite different centres in different areas. Whilst this is current practice, at locations that could trigger congestion or potential rear-end accidents, the analysis results should be used with caution. A worse case analysis approach should be adopted where the right turn should not be allowed to filter across pedestrians.</p>	<p>The SIDRA analysis includes right turns on Edinburgh Road occurring only in the diamond phase (ie they do not filter).</p>
<p>We note from your recent correspondence that prohibiting the right turn from the west is not desirable from a development perspective. However, your SIDRA results indicate the right and left turns are critical movements, which further highlights TfNSW's concerns regarding potential blockages at this intersection. The prohibition of the right turn movement from the west is essential to be in line with TfNSW's requirements.</p> <p>We anticipate that further works would be required to maintain the current Level of Service at the intersection of Edinburgh Road and Smidmore Street.</p>	<p>CBRK note that critical movements do not imply a problem. The critical movements are those which determine the phase and cycle lengths. Critical movements occur at all signalised intersections, regardless of the allowable turning movements.</p> <p>For the subject intersection, the degree of saturation for this right turn is some 0.43, indicating significant spare capacity and no unusual issues.</p>
<p>In regard to the central median between the leg of Edinburgh Road/Smidmore Street and Edinburgh Road/Sydney Steel Road, this should be included in the traffic signal plan.</p>	<p>The final TCS Plan includes the median and notes that it will be constructed by others, if required. This plan was provided 'in-principle' support from TfNSW on 21 September 2021.</p>
<p>Swept paths for left-turn movements should accommodate an 8.8m service vehicle from the kerb lane. It is not clear what vehicle type has been tested for the left turn into the site access.</p>	<p>The design vehicle turning into this car park access is the B99 car. Trucks are not proposed to use this access point. Trucks will use the other access points to the site on Sydney Steel Road.</p>

Comment	Response
Response to submission dated 25 May 2021	
Item 3. TfNSW accepts the response for differences in AM and PM peak arrivals. Please supply an updated SIDRA model to reflect minimum pedestrian and other corrections specified in Items 4,5, and 6.	The final SIDRA model was provided to DPIE on 3 September 2021 and satisfactorily addresses these matters.
Item 7. The issue of the median in Edinburgh Road between Smidmore Street and Sydney Steel Road relates to the Marrickville Metro. However, the current arrangement poses a potential safety risk and will be monitored for 6 months following the operation of the Metro Shopping Centre. Please be aware that following the trial period the road network will change and TfNSW must consider / assess cumulative effects of two developments in question. Due to safety concerns, Please ensure provision is made in your design for a median in Edinburgh Road between Smidmore Street and Sydney Steel Road and amended modelling also includes this option.	The final TCS Plan includes the median and notes that it will be constructed by others, if required. This plan was provided 'in-principle' support from TfNSW on 21 September 2021.
Item 9. Please be aware that TfNSW must consider / assess cumulative effects of two developments in question and insure safety is not compromised. The roundabout will be monitored with the Metro Shopping Centre development	This matter is noted.
Item 11, 12. The SIDRA model is to be provided and reviewed in line with SIDRA user guidelines for acceptance.	The final SIDRA model was provided to DPIE on 3 September 2021.
Item 13, 14. Maintaining the same Level of Service for developments is a principle of TfNSW to manage the network. It is expected that the proponent provides mitigation measures to maintain a similar level of service. The banning of the right turn from the west was an obvious measure to enhance the efficiency of the intersection at Edinburgh Road and Smidmore Road. Banning this right turn reduces delays at this intersection, which would also provide a direct benefit to the Woolworths Site for vehicles to and from the development. We note your comment that "this would increase the number of vehicles queueing on Edinburgh Road westbound" Any negative delay to the network should be	<p>CBRK have advised that based on their discussions with TfNSW, the removal of the right-turn into the site was a suggestion to be considered. Accordingly, the travel times for vehicles entering the development from the north-west were assessed for the following scenarios:</p> <ul style="list-style-type: none"> ▪ with the right turn as proposed; and ▪ without the right turn, requiring these vehicles to travel to the roundabout at Sydney Steel Road, undertake a u-turn and enter the site via a left turn from Edinburgh Road. <p>The assessment found:</p> <ul style="list-style-type: none"> ▪ During the morning peak period, the travel time for vehicles (without the right turn) would be some 68 seconds, which is similar to a 66

Comment	Response
<p>demonstrated with your SIDRA model if this measure is not appropriate.</p>	<p>second delay for vehicles turning right into the site at the traffic signals.</p> <ul style="list-style-type: none"> During the afternoon period, the travel time for vehicles (without the right turn) would be some 127 seconds, which is considerably longer than a 60 second delay for vehicles turning right into the site at the traffic signals. <p>Based on the above, there would be no advantage to vehicles entering the site by removing the right turn movement. There would be significantly longer travel times for vehicles during the afternoon, if the right turn into the site was not provided. CBRK also noted TfNSW had previously raised concerns regarding queues extending along Edinburgh Road towards Sydney Steel Road. If the right turn into the site was not provided, these queues would be greater.</p>
<p>Item 19. As discussed in item 7, indicate on the TCS plan the future median in Edinburgh Road.</p>	<p>The final TCS Plan includes the median and notes that it will be constructed by others, if required. This plan was provided 'in-principle' support from TfNSW on 21 September 2021.</p>
<p>Response to submission dated 14 July 2021</p>	
<p>The time referred to in the applicant's analysis appears to be the movement delay at the right turn bay and some other calculation for the alternative, and not a travel time comparison.</p> <p>Furthermore, as the overall intersection delay increases with a right turn movement directly into the site, it is only reasonable to assume that the approach delays to the intersection would also be affected</p> <p>The summation of movement delays at the intersection as presented in the latest SIDRA file does not include the upstream impacts to all traffic that might be affected, which may include those vehicles that enter the site.</p> <p>SIDRA user guide Section 7 describes the methodology for assessing the performance along a path of travel in a specific direction between two points in a network. This feature should be used to assess whether or not a right turn into the site would improve travel to the site.</p>	<p>CBRK have advised that based on their discussions with TfNSW, the removal of the right-turn into the site was a suggestion to be considered. It is considered desirable to provide the right turn into the site for the following reasons:</p> <ul style="list-style-type: none"> the site has previously been approved with a signalised intersection, including the right turn, for a higher traffic generating development (Masters Home Improvement centre and industrial development); the signalised intersection will operate at a satisfactory level of service (level of service C) during peak periods' the proposed development will operate 24 hours per day for seven days a week; and outside morning and afternoon peak periods, the signalised intersection will operate at better levels of service (level of service B/C, with lesser delays).

Comment	Response
<p>A route performance analysis was also undertaken by TfNSW using the applicant's geometry and phasing to include a larger network for the purpose of calculating travel time in Edinburgh Road between Fitzroy and Sydney Streets.</p> <p>The results show that with a right turn phase into the site (Scenario 1) the right turn movement has an average of 193 seconds travel time compared to banning the right turn into the site of 90 seconds for the AM peak. The PM with a right turn (Scenario 1) is also worse with a travel time of 195 seconds compared with 137 seconds.</p>	<p>'In-principle' support for the concept TCS plan was provided by TfNSW on 21 September 2021.</p>

4.2.3. Fire & Rescue NSW

Table 6 Response to Fire & Rescue NSW Submission

Comment	Response
<p>FRNSW notes that a SEPP 33 screening assessment has been conducted. FRNSW are satisfied with the hazard and risk aspect of the proposal.</p>	<p>Noted. No response required.</p>
<p>That a comprehensive Emergency Response Plan (ERP) is developed for the site. The ERP is to specifically address:</p> <ul style="list-style-type: none"> Foreseeable on-site and off-site fire events and other emergency incidents (such as fires involving dangerous goods and battery energy storage systems) or potential hazmat incidents. Details the appropriate risk control measures that would need to be implemented to safely mitigate potential risks to the health and safety of firefighters and other first responders. Such measures will include the level of personal protective clothing required to be worn, the minimum level of respiratory protection required, decontamination procedures to be instigated and minimum evacuation zone distances. <p>Other risk control measures that may need to be implemented in a fire emergency (due to any unique hazards specific to the site) should also be included in the ERP.</p>	<p>An Emergency Response Plan has been prepared by First 5 Minutes Pty Ltd and submitted at Appendix QT.</p> <p>The ERP specifically addresses:</p> <ul style="list-style-type: none"> Foreseeable on-site and off-site fire events and other emergency incidents – Section 9 of ERP. Details the appropriate risk control measures that would need to be implemented to safely mitigate potential risks – Appendix G of ERP. Other risk control measures that may need to be implemented in a fire emergency – Section 20 of ERP.

Comment	Response
Two copies of the ERP (detailed in recommendation 1 above) be stored in a prominent 'Emergency Information Cabinet' located in a position directly adjacent to the site's main entry point/s.	Noted. No response required.
Once constructed and prior to operation, that the operator of the facility contacts the relevant local emergency management committee (LEMC). The contact details of members of the LEMC can be obtained from the relevant local council.	Noted. No response required.
FRNSW notes that a number of performance solutions are identified in the BCA report (prepared by the McKenzie Group, 27th August 2020). The identified performance solutions are required to be addressed and approved through consultation with FRNSW and the submission of a fire engineering brief questionnaire (FEBQ).	<p>As required by the provisions of Section 144 of the <i>Environmental Planning and Assessment Regulations</i>, and due to the size and complexity of the development, liaison will be required with Fire and Rescue NSW.</p> <p>Initial commentary on the Fire Engineered Strategy will be sought through the FEBQ process, with any direction provided by the Brigade adopted within the Fire Engineered Solution and/or design for the development.</p> <p>The Fire Engineering Report, will be formally issued to FRNSW in accordance with the regulatory process nominated above and included within major Construction Certificate milestones for the development.</p>

4.2.4. Heritage NSW – Aboriginal Cultural Heritage

Table 7 Response to Heritage NSW Submission

Comment	Response
Correspondence dated 25 November 2020	
<p>We note the ACHAR is a working draft only and as such does not supply the information required for Heritage NSW review. The information supplied in the EIS is therefore also incomplete.</p> <p>Heritage NSW requests that when the ACHAR is completed (this is indicated in the EIS to be expected to be finalised by December 2020), the EIS needs to be updated to reflect the findings of the ACHAR and both documents should be referred to us for review at this time.</p>	<p>A copy of the final ACHAR is provided at Appendix E. The conclusions and recommendations are summarised below:</p> <ul style="list-style-type: none"> There are no registered Aboriginal objects and/or archaeological sites within the subject area. The original landscape is covered by between 0.7–1.3 m of imported fill and the ground surface visibility within the subject area is considered zero.

Comment	Response
<p>We look forward to reviewing the EIS and ACHAR once they have been completed.</p>	<ul style="list-style-type: none"> ▪ There are landscape features with potential for Aboriginal objects or archaeological deposits located within the subject area. ▪ Additional investigation was considered warranted in the form archaeological monitoring to establish the presence or absence of Aboriginal objects and archaeological resources within the subject area. ▪ No additional Aboriginal cultural heritage values have been identified by the RAPs. <p>Based on the conclusions of this assessment the proposed activity can proceed under the following recommendations:</p> <ul style="list-style-type: none"> ▪ Continued RAP Consultation ▪ Further Archaeological investigation (Development of Archaeological Research Design (ARD) and Monitoring/Excavation Methodology (MEM) and Archaeological Monitoring) ▪ Archaeological Chance Finds Procedure ▪ Human Remains Procedure <p>The final ACHAR was provided to Heritage NSW for their preliminary review in June 2021. Each of the matters raised by Heritage NSW in their supplementary letter dated 19 July 2021 is addressed below.</p>
<p>Correspondence dated 19 July 2021</p>	
<p>Heritage NSW notes that recommendations for Aboriginal cultural heritage are outlined in section 9 of the ACHAR (pages 68 – 69).</p> <p>Whilst monitoring is supported during the removal of fill, it is recommended that an Aboriginal cultural heritage research design and excavation methodology, including a staged testing and salvage program, be developed for those areas with intact deposits.</p> <p>An Aboriginal cultural heritage research design and excavation methodology needs to be formulated that includes at least the following:</p> <ul style="list-style-type: none"> ▪ Aboriginal cultural heritage research questions 	<p>Each of the matters raised by Heritage NSW can be addressed through the imposition of appropriate conditions of consent.</p> <p>The updated mitigation measures (Appendix B) include provision for each of these matters to be addressed.</p>


Comment	Response
<ul style="list-style-type: none"> ▪ The proposed staging and timing of excavations in relation to the development phases ▪ A staged testing and excavation methodology for those areas of moderate and moderate to high archaeological potential ▪ Detailed triggers for expansion of test pits to salvage excavation ▪ A methodology for the excavation of features such as, but not limited to, hearths, knapping floors and middens ▪ Artefact analysis methodology ▪ Identified stop points where additional consultation with registered Aboriginal parties and Heritage NSW may be required if significant Aboriginal objects are identified ▪ Sampling and dating methodology ▪ Short term and long term care and control of any Aboriginal objects ▪ Reporting requirements <p>Furthermore, the Aboriginal cultural heritage research design and excavation methodology must be formulated in consultation with the registered Aboriginal parties for the project.</p>	

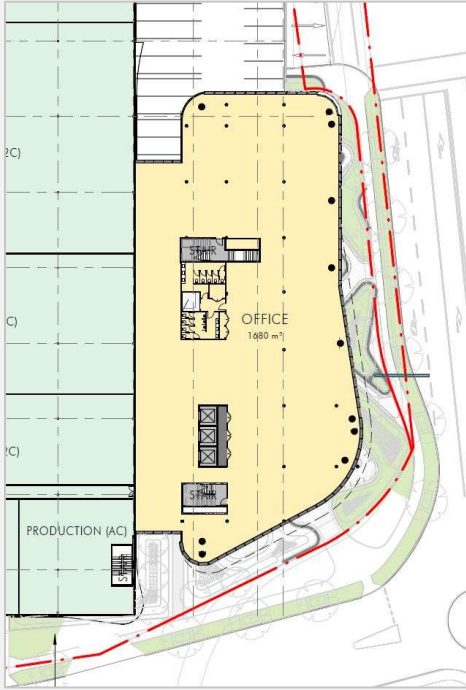
4.2.5. Inner West Council

Table 8 Response to Inner West Council Submission

Comment	Response
<p>Flooding</p> <p>The Flood Management Report has determined that the 1 in 100-year flood level applicable to the site is 4.81m AHD. As the flood depths post development are below/ less than 300mm in accordance with Council's Flood Management DCP Cl. 2.22.5, 300mm of freeboard is required. Therefore, the plans should be amended to increase the minimum floor levels of the proposed development to 5.11m AHD.</p>	<p>A response to these matters has been prepared by Richmond+Ross and submitted at Appendix I. An updated Flood Report has also been prepared and submitted at Appendix H.</p> <p>The flood study has been updated to incorporate the culvert diversion requested by Sydney Water and therefore the minimum floor levels required have changed. As discussed in Section 8 of the updated flood report, Council's DCP for flood management, Sec 2.22.5, control C13 states:</p>

Comment	Response
	<p><i>“Floor levels (except for access-ways) must be at least 500mm above the 1% AEP flood level, or the buildings must be floodproofed to at least 500mm above the 1% AEP flood level. For areas of minor overland flow (a depth of 300mm or less or overland flow of 2cum/sec or less) a lower freeboard of 300mm may be considered on its merits.”</i></p> <p>Based on the modelled flood extent, the area in the immediate vicinity of the building has less than 100mm of flood depth and therefore is considered an area of minor overland flow.</p> <p>The floor level of the proposed is 4.86m AHD while the 1% AEP flood level is 4.61m AHD. It is proposed to construct 35mm threshold ramps at all access doorways on the ground floor and locally grade (additional 15mm) the external ground level around the doorways to achieve the flood planning level of 4.91m AHD.</p>
<p>The improvement post development in flood depths is achieved by collecting the flood waters by large pit inlets and diverting them to an underground flood detention of 1200m³ volume equal to the existing site's above ground 1% AEP flood storage. No information has been provided on the design of these inlet structures or if any blockage factors have been applied to the modelling.</p> <p>It is Council's experience that "grate only" inlet structures block readily and do not achieve their design capacity. The inlet structures should incorporate kerb inlet, or "letter box" type inlet structures that are less prone to blockage with best practice blockage factors applied. Details of an overland flow path should also be provided in case of failure of the system.</p>	<p>An updated flood study has been submitted at Appendix H.</p> <p>It is proposed to collect the flood flow via a network of pit inlets and divert it to an underground flood detention chamber via drainage culverts. The proposed inlet pit is a standard kerb inlet pit with a 2.4m lintel to reduce the impact of debris blockage.</p> <p>Details on the overland flow path are provided in the updated Stormwater Drawings at Appendix G.</p>
<p>To better understand the potential consequence of failure, and to better inform the amount of blockage factors to apply, and verify the acceptance of a reduced freeboard (of 300mm) the Flood Management Report should also include a post development flood scenario (change in flood depth map) with total blockage of the inlet structures.</p>	<p>The Flood Management Report has been updated to include a post development flood scenario for 100% site outlet blockage scenario. Refer to Figure 33 and Figure 43 in Appendix H.</p>
<p>A post development PMF change in flood depth map should also be provided as adjacent redevelopment sites (for example Marrickville</p>	<p>Refer to the updated Flood Management Report at Appendix H for PMF change in flood levels. Refer</p>

Comment	Response
<p>Metro) have produced Flood Emergency Response Plans based on existing PMF levels and an assessment needs to be made if the change in PMF levels post development is of any consequence.</p>	<p>to Figure 44 and Figure 45 in Appendix H for PMF change in flood depths.</p>
<p>Stormwater</p> <p>A Council Stormwater pipe drains through the site to the existing Sydney Water Channel. This pipe has not been detailed on any of the submitted plans and it appears that it will be built over which is not acceptable and contrary to Councils DCP 2.25 (Control C31). Council's stormwater asset shall not be built out but be suitably relocated away from the proposed building.</p> <p>Similarly, Sydney Water's stormwater infrastructure is also proposed to be built over, contrary to their guidelines. The stormwater plans even detail columns within the location of the stormwater channel. It is recommended that the applicant approach Sydney Water regarding their requirements with regard to the Stormwater Channel.</p>	<p>The Applicant has continued to consult with Sydney Water regarding the Sydney Water assets that traverse across the Site.</p> <p>Sydney Water have stated they would not object to the current proposal, if the Sydney Water's stormwater channel is deviated and complies with the meeting outcomes discussed on 25 September 2020. It is proposed to terminate the council owned stormwater pipe at the location of the realigned culvert and discharge into the culvert. Sydney Water have also requested that the culvert be realigned to the site boundary.</p> <p>Accordingly, there has been a slight modification to the building façade alignment since lodgement of the EIS. The northern building façade is now located at least 1m off the stormwater easement and has resulted in a minor GFA reduction of 600sqm. Refer to Section 3 for further discussion.</p> <p><i>Original/Lodged:</i></p>  <p><i>Amended:</i></p>

Comment	Response
	
<p>Traffic</p> <p>Vehicular access and associated vehicle standing areas shall be designed in accordance with Australian Standard AS 2890.1-2004, AS2890.2-2002, AS2890.6-and Part 2.10 of Marrickville Development Control 2011.</p>	<p>CBRK have checked the design and it generally satisfies the standard. An appropriate condition of consent could be included requiring compliance with Australian Standards.</p>
<p>The Traffic and Access Report has not adequately assessed the effect of cumulative traffic impacts from the adjacent developments. Table 3.1 of the report submitted only applies the proposed development traffic to the existing traffic. No additional future traffic from other developments has been included. The proposal should incorporate traffic generation from the current “Part 3A” redevelopment project of the Marrickville Metro in their calculations. An amended traffic report incorporating a revised traffic assessment incorporating future traffic from other developments should be submitted.</p>	<p>As noted in the TIA submitted with the SSDA, the proposed amended signalised intersection at Edinburgh Road/Smidmore Street, including signalised access to the site, was designed to take account of the Marrickville Metro extensions.</p> <p>The final SIDRA model was provided to DPIE on 3 September 2021 and satisfactorily addresses these matters.</p>
<p>The Traffic Signals design shall be amended to include bicycle lanterns</p>	<p>The need for bicycle lanterns will be addressed at the detailed design stage for the intersections works.</p>
<p>Although an off-road shared pedestrian/ cycle path has been shown on the plans it is not clear if it has been designed to be a minimum width of 3 metres</p>	<p>The minimum width of the off-road shared pedestrian/cycle path is 3m. Refer to dimensions on updated plans.</p>

Comment	Response
<p>Road widening in Sydney Steel Road should be provided and be detailed on the plans to allow for the shared pedestrian/ cycle path is per the previous proposal below.</p>	<p>Noted. Refer to updated architectural plans submitted at Appendix C.</p>
<p>Edinburgh Road</p> <p>Recommend that the ground floor Edinburgh Road frontage be amended to incorporate additional activation through additional active ground floor uses which “wrap” the parking.</p>	<p>The office component has been sited towards the corner of Edinburgh Road and Sydney Steel Road to activate the street frontage whilst improving the Site’s interface with the residential area to the north. The office lobby is located at ground floor and will comprise floor to ceiling clear glazing to provide a prominent street address and activate the ground floor. Furthermore, a landscaped garden is proposed along the Edinburgh Road frontage which enhances streetscape activation by providing a place of respite for future employees and visitors.</p>
<p>Sydney Metro Site</p> <p>The site is located directly opposite a substantial parcel of land, currently being utilised for the construction of the Sydney Metro Line. The future potential re-development of the land currently utilised by Sydney Metro should be considered during assessment for the current application. Matters such as driveway locations, truck turning bays, window, lighting locations, pedestrian accessibility/ safety and width of Sydney Steel Road should all be considered.</p>	<p>As discussed in Section 4.2.6, two briefings were held with Transport for NSW (Sydney Metro) and Inner West Council to discuss the proposal and its relationship to the Sydney Metro site adjacent and its future potential re-development. A copy of meeting minutes is provided in Appendix G of the Engagement Strategy submitted with the EIS.</p> <p>Sydney Metro presented a concept for use of the land located on the corner of Sydney Steel Road and Edinburgh Road. The proposal outlined commercial office space and retail uses. Sydney Metro advised the current land zoning would need to be amended to permit these uses. However, a Planning Proposal has not yet been prepared or lodged to facilitate the amendment of the planning controls.</p> <p>It was acknowledged that a future commercial office development could increase traffic generation within the locality. Further, it was agreed the car park entry could be located to mitigate potential conflicts between the proposed and potential future development. Sydney Metro and Inner West Council also identified opportunities to accommodate cycleways through the Sydney Metro residual site to Sydenham Station.</p> <p>However, the proposed redevelopment of the Sydney Metro residual site appears to be at an early concept phase. While preliminary drawings have been shared for discussion purposes, a Planning Proposal and/or Development Application</p>

Comment	Response
	<p>have not yet been lodged and there is no certainty regarding the future land use activities or built form outcomes, including development yield, potential traffic generation and likely staging/delivery.</p> <p>The EIS has considered the cumulative impacts of the proposed development and the residual site based on the existing planning controls. The following assumptions have been made:</p> <ul style="list-style-type: none"> ▪ The site is zoned part IN1 General Industrial and part SP2. General industrial uses including light industries, warehouse and distribution centres are permitted within the IN1 zone. Residential accommodation and commercial premises are prohibited. ▪ The site is subject to a maximum FSR of 0.95:1. There is no maximum building height. <p>The Traffic Impact Assessment submitted with the EIS has addressed the potential redevelopment of the site, including the location of the car park entry. Access driveways from Sydney Steel Road are proposed in accordance with Australian Standards. Access to the Sydney Metro site from Sydney Steel Road, if proposed, would be assessed in association with the planning process for that site. However, the proposed Woolworths development does not preclude future access to the Sydney Metro site from Sydney Steel Road.</p> <p>Any future Planning Proposal and/or Development Application for the Sydney Metro residual site should address the cumulative impacts of the proposed rezoning and associated built form uplifts, including the potential cumulative impacts with existing, approved and proposed development. This should include a review of publicly available DA documentation, including traffic impact assessments prepared for any recent approvals or current proposals.</p>
<p>Acoustic</p> <p>The proposal seeks consent for 24-hour operation 7 days a week and is located within proximity of sensitive residential receivers. The potential acoustic impacts from the proposed operations needs to be closely assessed and controlled as</p>	<p>Acoustic Logic have prepared an updated SSDA Acoustic Assessment (Appendix J) and accompanying Response to Submissions (Appendix K) which responds to the feedback from Inner West Council. The updated report addresses each of the matters identified by Council, including:</p> <ul style="list-style-type: none"> ▪ Assessment of noise emissions in accordance with the NSW EPA Noise Policy for Industry,

Comment	Response
<p>part of the current application to ensure minimal impacts for the locality and community.</p> <p>Concerns regarding truck movements to and from the site during the night should be reviewed and measures to mitigate noise emissions from trucks must be incorporated into any consent.</p> <p>Acoustic measures should incorporate both management plans and physical treatments and any physical measures should be properly architecturally integrated into the fabric of the building.</p>	<p>including 24 hour operation, which conclude noise levels are expected to meet all relevant requirements.</p> <ul style="list-style-type: none"> ▪ Truck movements to and from the site have been considered as part of the noise impact assessment, with recommendations for truck movements during the night-time period (refer below). ▪ Management and physical controls as part of the assessment. <p>The additional recommended mitigation measures to meet the noise emission requirements include:</p> <ul style="list-style-type: none"> ▪ Review and detailed design of mechanical plant prior to issue of a construction certificate (CC) ▪ Installation of a 1.5 metre high acoustic barrier on the ground floor and Level 1 car parks ▪ Acoustic barriers for the Level 2/3 loading docks ▪ The driveway between 76 Edinburgh Road and the site (north western façade) not being used for routine site activities ▪ Acoustic screening to the office building plant room facades (based on the mechanical services review) ▪ Medium trucks accessing the site in a westbound direction on Edinburgh Road during the night time period ▪ Heavy trucks accessing and leaving the site via Sydney Steel Road/Edinburgh Road during the night time period. ▪ Treatment of the northern car park pavement to provide for minimum vertical displacement and potential for noise generated by wheel to concrete impacts (ie car tyre squeal).

4.2.6. Sydney Water

Table 9 Response to Sydney Water Submission

Comment	Response
<p>Water Servicing</p> <p>The property has a partial frontage to an existing 150mm watermain in Sydney Steel Road. This section of main is a single feed to the site, however, the local network supplying the area has good connectivity with acceptable minimum pressures to service the proposed development. Depending on the connection location a possible extension may be required.</p>	Noted.
<p>Wastewater Servicing</p> <ul style="list-style-type: none"> ▪ The site is traversed by a deep oviform trunk main and a 225mm reticulation main. ▪ A connection to the 225mm sewer main will be required to service the future development. ▪ Detailed requirements will be provided at the Section 73 phase when the proponent submits their development's demand/discharge details. 	Noted.
<p>Stormwater</p> <ul style="list-style-type: none"> ▪ Woolworths representative, Water Servicing Coordinator and Sydney Water had a meeting on 25 September 2020 regarding the proposed development over Sydney Water's 3,000mm x 1,500mm stormwater channel and have reached an agreement to deviate Sydney Water's stormwater channel as per the attached drawing, with a box culvert with the dimension of 3,000mm x 1,500mm in such a way that there are no more buildings or permanent structures over Sydney Water's future stormwater channel. o Drawing No 190372 SK10 Rev B Dated 08.10.20 (copy attached) ▪ Sydney Water would not object to the current proposal, if the Sydney Water's stormwater channel is deviated as per the above drawing and comply with the meeting outcomes which was held on 25 September 2020. 	<p>Noted. The Applicant has continued to consult with Sydney Water regarding the Sydney Water assets that traverse across the Site.</p> <p>Sydney Water have stated they would not object to the current proposal, if the Sydney Water's stormwater channel is deviated and complies with the meeting outcomes discussed on the 25 September 2020.</p> <p>There has been a slight modification to the building façade alignment since lodgement of the EIS. The northern building façade is now located at least 1m off the stormwater easement.</p>

4.2.7. Sydney Metro

Table 10 Response to Sydney Metro Submission

Comment	Response
<p>Response to broader precinct outcomes</p> <p>The proponent must consider the potential future land use outcomes of Sydney Metro's residual site opposite the subject development site, as presented by Sydney Metro during consultation undertaken prior to the exhibition of the EIS.</p> <p>The proposed development should design for activation in an urban setting along Sydney Steel Road and have regard for the interface of the Woolworths development with cyclists, pedestrians and the public domain.</p> <p>Sydney Metro notes that follow up meeting minutes were not provided as part of the proponent's Stakeholder Consultation Report. At this meeting Inner West Council advised the proponent to include the long-term development potential of the broader precinct in their analysis and assessment of the proposed development by Woolworths. The proponent should submit to DPIE these meeting minutes and their precinct analysis in response to Council's request.</p>	<p>Two briefings were held with Transport for NSW (Sydney Metro) and Inner West Council to discuss the proposal and its relationship to the Sydney Metro site adjacent. A copy of meeting minutes is provided in Appendix G of the Engagement Strategy submitted with the EIS.</p> <p>At this meeting, Sydney Metro presented a concept for use of the land located on the corner of Sydney Steel Road and Edinburgh Road. The proposal outlined commercial office space and retail uses. Sydney Metro advised the current land zoning would need to be amended to permit these uses. However, a Planning Proposal has not yet been prepared or lodged to facilitate the amendment of the planning controls.</p> <p>It was acknowledged that a future commercial office development could increase traffic generation within the locality. Further, it was agreed the car park entry could be located to mitigate potential conflicts between the proposed and potential future development. Sydney Metro and Inner West Council also identified opportunities to accommodate cycleways through the Sydney Metro residual site to Sydenham Station.</p> <p>However, the proposed redevelopment of the Sydney Metro residual site appears to be at an early concept phase. While preliminary drawings have been shared for discussion purposes, a Planning Proposal and/or Development Application have not yet been lodged and there is no certainty regarding the future land use activities or built form outcomes, including development yield, potential traffic generation and likely staging/delivery.</p> <p>The EIS has considered the cumulative impacts of the proposed development and the residual site based on the existing planning controls. The following assumptions have been made:</p> <ul style="list-style-type: none"> ▪ The site is zoned part IN1 General Industrial and part SP2. General industrial uses including light industries, warehouse and distribution centres are permitted within the IN1 zone.

Comment	Response
	<p>Residential accommodation and commercial premises are prohibited.</p> <ul style="list-style-type: none"> ▪ The site is subject to a maximum FSR of 0.95:1. There is no maximum building height. <p>In the absence of specific land uses, gross floor area, car parking and operational details regarding the future development, it is not possible to undertake a cumulative impact of likely future developments beyond what is currently permitted under the local planning controls. The Traffic Impact Assessment submitted with the EIS has addressed the potential redevelopment of the site, including the location of the car park entry. Access driveways from Sydney Steel Road are proposed in accordance with Australian Standards. Access to the Sydney Metro site from Sydney Steel Road, if proposed, would be assessed in association with the planning process for that site. However, the proposed Woolworths development does not preclude future access to the Sydney Metro site from Sydney Steel Road.</p> <p>Any future Planning Proposal and/or Development Application for the Sydney Metro residual site should address the cumulative impacts of the proposed rezoning and associated built form uplifts, including the potential cumulative impacts with existing, approved and proposed development. This should include a review of publicly available DA documentation, including traffic impact assessments prepared for any recent approvals or current proposals.</p>
<p>The proposed development should design for activation in an urban setting along Sydney Steel Road and have regard for the interface of the Woolworths development with cyclists, pedestrians, and the public domain</p>	<p>The proposed development has sought to activate both Sydney Steel Road and Edinburgh Road by:</p> <ul style="list-style-type: none"> ▪ Delivering a share path along Sydney Steel Road to improve pedestrian and cycle access from the Site to Sydenham Station and surrounding cycle and pedestrian networks. ▪ Locating the office component towards the corner of Edinburgh Road and Sydney Steel Road to activate the street frontage and provide opportunities for improved passive surveillance to the surrounding public domain. ▪ Setting back the entrance lobby to the office component from Sydney Steel Road by vertical columns, landscaping, and a feature 'breeze'

Comment	Response
	<p>wall to enhance the sense of human scale for cyclists and pedestrians.</p> <ul style="list-style-type: none"> ▪ Providing a strong tree canopy presence along Sydney Steel Road with the planting of Spotted and Lemon Scented Gums at regular intervals to soften the built form and provide street presence for both people using the public domain footpath and vehicles/pedestrians passing by. <p>As noted in the transport report submitted with the application, a shared pedestrian and cycle path will be provided along the Sydney Steel Road frontage to the site. The driveways and path will be provided in accordance with relevant standards.</p>
<p>Traffic and Transport Matters</p> <p>The proponent must consult with Sydney Metro in relation to any proposed changes to intersection construction staging works, construction site access and egress, or haulage movements. In particular, the proponent is to advise of changes that may impact the operation and construction of the Sydney Metro Train Facility South.</p> <p>The proponent must provide further information regarding any future improvements to the cycle network and public domain considering the interface with vehicular movements generated from the development, whilst also delivering commuter safety and public domain amenity outcomes.</p> <p>The proponent must consider the strategic importance of the subject development site in proximity to Sydenham Station Junction, taking into account opportunities to leverage off public transport infrastructure when targeting mode share for the proposed development.</p>	<p>Woolworths has consulted with Sydney Metro on two occasions regarding the proposed warehouse and CFC, vehicular access arrangements and intersection works.</p> <p>No road or intersection works are required in association with the construction of the Woolworths development. The intersection of Edinburgh Road with Smidmore Street would have a fourth signalised approach introduced, toward the end of the construction period. This should not significantly affect activities in the area, including construction of the Sydney Metro. Once operational, the upgraded signalised intersection would improve traffic conditions in the area.</p> <p>Discussion was held regarding the potential impacts of the proposal on existing intersections close to the site, namely the intersection of Smidmore Street and Edinburgh Road, Edinburgh Road and Sydney Steel Street. Clarification was sought on possible queuing at the intersections during peak times.</p> <p>As demonstrated in the SIDRA modelling, the intersection of Edinburgh Road with Smidmore Street (including the new fourth signalised approach) would operate with average delays of less than 30 seconds per vehicle during peak periods. This represents level of service C, a satisfactory level of service.</p>

Comment	Response
<p>The proponent must provide further information regarding any future improvements to the cycle network and public domain considering the interface with vehicular movements generated from the development, whilst also delivering commuter safety and public domain amenity outcomes.</p>	<p>The following information is provided regarding the future improvements to the cycle network, commuter safety and public domain amenity outcomes:</p> <ul style="list-style-type: none"> ▪ The proposal will deliver a share path along Sydney Steel Road to improve pedestrian and cycle access from the Site to Sydenham Station and surrounding cycle and pedestrian networks. ▪ The share path will be 3m wide with landscaping proposed either side to improve pedestrian/cyclist amenity and comfort. ▪ The proposed pedestrian and cycle path on Sydney Steel Road will improve connectivity for pedestrians and cyclists in the area. ▪ Several trees are proposed along the Site perimeter, both within the Site boundary and along the public footpath to enhance the streetscape and pedestrian experience along Edinburgh Road and Sydney Steel Road. ▪ A Crime Prevention Through Environmental Design (CPTED) Report has been prepared by Hill PDA (Appendix II of EIS) to address commuter safety and the potential for anti-social and criminal behaviour within and around the development. ▪ Surveillance opportunities over the share path have been maximised by providing extensive glazing and limiting the number of structural columns and tall landscaping to reduce opportunities for concealment.
<p>The proponent must consider the strategic importance of the subject development site in proximity to Sydenham Station Junction, taking into account opportunities to leverage off public transport infrastructure when targeting mode share for the proposed development.</p>	<p>The proposed development has considered the strategic importance of the site's proximity to Sydenham Station Junction and has sought to specifically respond to the Sydenham Precinct Plan.</p> <p>The Precinct Plan shows the site within the 800m walking catchment and provides for a 'new pedestrian connection' and cycle route connecting Sydney Steel Road to Shirlow Street and beyond.</p> <p>As illustrated in the submitted Landscape Strategy, new landscaping is proposed along Sydney Steel Road to enhance streetscape amenity for</p>

Comment	Response
	<p>pedestrians and cyclists and a 3m wide share path is proposed in the location identified in the Precinct Plan to encourage people to walk and cycle. On-site bicycle parking and end-of-trip facilities will also be provided to encourage employees to utilise the surrounding active and public transport infrastructure.</p> <p>Prior to opening of the facility, Woolworths will advise staff of public transport availability and options for travel, particularly for employees on site during the day. A workplace travel plan will be prepared, which will encourage the use of public transport, include information, maps and timetables and raise awareness of the health benefits of walking and cycling (including maps showing walking and cycling routes, adjacent to and near the site). Safe and secure bicycle parking, showers and lockers will also be provided.</p>

Figure 2 Extract from Sydenham to Bankstown Urban Renewal Corridor Strategy



Source: Department of Planning

4.3. ORGANISATION

4.3.1. Ausgrid

Ausgrid has no objection to the development. The following was recommended:

- The Proponent should be made aware that Ausgrid has 132,000V underground cables present in Edinburgh Road.
- The Proponent should obtain the plans through the DBYD process and refer to Ausgrid Network Standard NS156 regarding any excavations proposed near these cables.

4.4. RESPONSE TO COMMUNITY SUBMISSIONS

Table 11 Response to Public Submissions

Comment	Response
Hours of operation	
<ul style="list-style-type: none"> ▪ Concerned regarding increase in noise and light levels due to the 24 hours operation, 7 days per week ▪ Concerned the proposed 24/7 operations will impact sleep and quality of life in our community. ▪ Residents already suffer from airport noise however the airport curfew provides respite between 11:00pm and 6:00am. ▪ Request additional respite hours by restricting operational hours to match those of the airport. 	<p>The site is within an industrial zone where a key objective is to provide a wide range of industrial and warehouse land uses, many of which require extended operating hours to meet customer demands. The proposed warehouse is permissible with consent in the IN1 zone and consistent with adjoining industrial developments within the Sydney Steel Precinct.</p> <p>The proposed 24/7 operations are in response to the increasing importance placed on supply chain operations in Greater Sydney and are critical for the operation of the warehouse. The proposed hours of operation are required for Woolworths to meet the growing demand for online groceries, provide faster and more flexible delivery options for customers and supermarkets, deliver online orders to Woolworths' customers in a timely manner and keep up with customer demands for express delivery and click and collect services, which have been exacerbated due to COVID-19.</p> <p>Notwithstanding the above, the Applicant acknowledges the close interface of the industrial zone with adjoining residential areas. Various design and landscape strategies have been implemented to ensure the 24/7 operation does not adversely impact on residential amenity. In particular:</p> <ul style="list-style-type: none"> ▪ The warehouse component has been purposely located towards the rear of the Site, behind the office. A generous setback for landscape screening and acoustic buffering is also proposed. ▪ A considerable setback (approximately 50m) to the residential properties to the north on the opposite side of Edinburgh Road is proposed.

Comment	Response
	<ul style="list-style-type: none"> ▪ Light spill will be properly managed through the strategic location of outdoor lighting and full compliance with Australian Standards for outdoor lighting. ▪ The customer fulfilment centre will operate with overlapping shifts. Most staff will work shifts commencing either in the early hours of the morning or night. Customer home deliveries will typically occur during the morning between 5:00am and 8:00am, with vehicles returning later in the morning, and during the afternoon between 1:00pm and 4:00pm. ▪ During the evening and early morning, there will be limited staff on site. The primary role of staff on-site during these hours will be 'night filling,' which involves restocking the shelves with stock. Typically, night fill standard times are 9pm till 6am however this varies depending on the amount of stock and availability of staff. Night-filling is an essential element of the proposal to ensure there is adequate stock for supermarkets and Woolworths customers. Minimal noise is associated with this activity. <p>Acoustic Logic have prepared an updated SSDA Acoustic Assessment (Appendix J) and accompanying Response to Submissions (Appendix K) which responds to the feedback from the local community. Additional recommended mitigation measures to meet the noise emission requirements include:</p> <ul style="list-style-type: none"> ▪ Review and detailed design of mechanical plant prior to issue of a construction certificate (CC) ▪ Installation of a 1.5 metre high acoustic barrier on the ground floor and Level 1 car parks ▪ Acoustic barriers for the Level 2/3 loading docks ▪ The driveway between 76 Edinburgh Road and the site (north western façade) not being used for routine site activities ▪ Acoustic screening to the office building plant room facades (based on the mechanical services review) ▪ Medium trucks accessing the site in a westbound direction on Edinburgh Road during the night time period ▪ Heavy trucks accessing and leaving the site via Sydney Steel Road/Edinburgh Road during the night time period ▪ Treatment of the northern car park pavement to provide for minimum vertical displacement and potential for noise

Comment	Response
	generated by wheel to concrete impacts (ie car tyre squeal).
Traffic Impacts	
<ul style="list-style-type: none"> ▪ Concerned increase in traffic will cause severe impact to quality of life of local community particularly as Edinburgh Road already carries heavy truck traffic. ▪ Implications of increased truck activity along Edinburgh Road on health of local community and residents. 	<p>An updated Traffic Impact Assessment (TIA) has been prepared by Colston Budd Rogers & Kafes and submitted at Appendix L. The proposed traffic generation will not have a severe impact on the quality of life of the local community for the reasons outlined below:</p> <ul style="list-style-type: none"> ▪ The number of semi-trailers delivering to the customer fulfilment centre will be relatively low, at some 10 to 15 inbound deliveries expected per day. Deliveries from the customer fulfilment centre will be made by 6.4 metre small rigid trucks, generally outside peak times. ▪ Trucks to and from the existing site currently use the proposed route along Edinburgh Road. ▪ Edinburgh Road is intended to serve sites in the industrial area, including the subject site and the adjacent shopping centre. ▪ During peak periods, the proposed development will have a total traffic generation of approximately 270 vehicles per hour two-way. A DA was previously approved on the site for a Masters development which generated approximately 360 vehicles per hour two-way during peak periods. When compared to the approved development, the proposal will have a much lower traffic generation. ▪ The site has been chosen for the development given the public transport accessibility, including bus routes and connections to existing and future upgraded railway connections. ▪ To minimise traffic impacts, employees will be encouraged to consider active travel to travel to and from work. Prior to opening the facility, a work place travel plan will be prepared. The work place travel plan will encourage use of public transport by employees and visitors, identify existing bus routes which stop adjacent to the site, work with bus operators to improve services and raise awareness of the health benefits of walking and cycling. ▪ The proposed development includes upgrades to the pedestrian and cycle network adjacent to the site, and connecting to nearby public transport, as well as

Comment	Response
	<p>significant bicycle parking and end of trip facilities for employees.</p> <p>An Air Quality and Odour Assessment has also been prepared by NorthStar Air Quality and submitted with the EIS. The assessment considered pollutants from idling road traffic emissions. To manage impacts associated with idling road vehicle engine emissions (air emissions and noise), Woolworths will implement a policy of zero engine idling at the site which will be strictly enforced. Upon arrival at the loading bays, vehicle engines will be immediately switched off and will only be switched on immediately prior to departure.</p>
Vehicle Access	
<ul style="list-style-type: none"> Consider access along Edinburgh Road is un-necessary given there are "entries and exits via Sydney Steel Road which are not flanked by residential properties." Oppose any access via the western end of Edinburgh Road into or out of the site. 	<p>Access along Edinburgh Road is currently available to the site. It is proposed to separate private vehicles from heavy vehicles to minimise queuing and maintain the safety of employees parking on site. The driveways and share path will be provided in accordance with relevant standards.</p> <p>The proposed access along Edinburgh Road will be via a fourth signalised approach and will include provision for new right turn bays in both directions on Edinburgh Road, for turns into the Site and Smidmore Street.</p>
Noise Impacts	
<ul style="list-style-type: none"> Concerned that noise from Edinburgh Road is already at an untenable level due to construction currently occurring within the immediate vicinity. Concerned regarding noise impacts associated with construction and 24/7 operation. Acknowledge the residential areas are located on the edge of an industrial area however consider it unreasonable to expect residents to have to deal with noise on a 24/7 basis. Main concern is the 24-hour operation of the warehouse and the subsequent disturbance to sleep. 	<p>Acoustic Logic have prepared an updated SSDA Acoustic Assessment (Appendix J) and accompanying Response to Submissions (Appendix K) which responds to the feedback from the local community. The updated report addresses each of the matters identified within the submissions, including:</p> <ul style="list-style-type: none"> Assessment of increased road traffic noise from the operation of the CFC, including recommended mitigation measures regarding truck movements during the night-time period. Assessment of operational noise from the facility in accordance with the NSW EPA Noise Policy for Industry, with noise levels predicted to be below the relevant noise emission requirements during all time periods, inclusive of the night time period. Acoustic screening to the Ground and Level 1 car parking areas along Edinburgh Road. Updated mitigation measures to minimise tyre squeal from the car park.

Comment	Response
<ul style="list-style-type: none"> ▪ Concerned there is no wall or screening of the car park onto Edinburgh Road. ▪ Concerned the 24-hour operation of the premises will give rise to vehicles going in and out of the car park at night, the slamming of car doors, shining lights directly into residential properties, noise from conversations and car radios. ▪ Concerned regarding statements within Appendix Z including: Section 7.2 states the “carpark is unlikely to be used during the night-time period.” Concerned the proposal does not offer suggestions to mitigate possible carpark noise emissions and is merely speculating that it is “unlikely”. ▪ Notes that the sleep disturbance criteria are only met by 2dB and the night criteria by 1dB. Consider the margin through which the noise analysis meets guidelines is exceptionally narrow. ▪ Concerned with the number of truck movements to the proposed development, especially at night, again noting the narrow sleep disturbance criteria. ▪ Request that truck movements be reduced or constrained at night or that there is a restriction between hours. ▪ Request the proponent consider further screening at the front of the development to screen carpark noise and/or consider negotiating with sensitive residential receivers, the installation of glazed windows and doors or insulation from sound events, given the significance of the project and the severe effect it will have on residential properties directly opposite the development site. 	



Comment	Response
Vehicle and pedestrian access conflicts	
<ul style="list-style-type: none"> ▪ Raise concerns regarding vehicular access to the site in particular the main vehicular access to the site for passenger vehicles proposed via the signalised access point from Edinburgh Road, opposite Smidmore Street. ▪ Concerned regarding the level of noise that will be generated by heavy vehicles using their compression brakes entering or exiting the site and the impact that will have on the local residents. ▪ Request that vehicles above the 3-tonne size are restricted from turning left into Edinburgh Road when exiting the complex to reduce the volume of heavy vehicles travelling past the residential zones in Edinburgh road. 	<p>The proposed signalised intersection is similar to the access arrangement currently approved on site (DA 2015/00168). The proposed road works include traffic signals for access to the site, widening of Edinburgh Road and right turn lanes in both directions. As noted in the TIA, the proposed development will have a lesser traffic generation than the approved DA.</p> <p>Vehicle access to the site is currently available from Edinburgh Road and the proposal seeks to maintain this. The proposed access is considered appropriate as it will allow for the separation of heavy and light vehicles. The Traffic and Access Report indicated that it was not necessary to limit truck routes to or from the site, because:</p> <ul style="list-style-type: none"> ▪ The number of vehicles delivering to the customer fulfilment centre will be relatively low, at some 15 per day. ▪ Trucks to and from the site already use this route. ▪ Edinburgh Road is intended to serve sites in the industrial area, including the subject site and the adjacent shopping centre. ▪ the Edinburgh Road intersections will operate at satisfactory or better levels of service with the left turn from Sydney Steel Road during peak period. This includes traffic from all components of the development, (customer fulfilment centre, office and speculative warehouse). ▪ at night (between 10:00pm and 6:00am), background traffic flows on the road network are significantly lower. ▪ traffic flows from the online fulfilment centre will also be lower at night. ▪ the road network will therefore readily accommodate these flows at night. <p>However, mitigation measures have been recommended within the SSDA Acoustic Assessment Report to minimise potential noise impacts from night-time heavy vehicle movements, including:</p> <ul style="list-style-type: none"> ▪ Medium trucks accessing the site in a westbound direction on Edinburgh Road during the night time period ▪ Heavy trucks accessing and leaving the site via Sydney Steel Road/Edinburgh Road during the night time period

Comment	Response
Emergency Vehicle Access	
<ul style="list-style-type: none"> Consider the proposed emergency access point at the western end of the site on Edinburgh Road to have the most impact on the residents given it is located opposite an existing residential area. Concerned that the proposed emergency access point has the potential to become another routine entrance / exit point for customers and heavy vehicles as a short cut to avoid congestion that may occur at the other exit/entrance points. Submissions note the Traffic Impact Assessment has determined weekday afternoon and Saturday traffic generations of 360 and 820 vehicles per hour two-way respectively. Concerned that if even 10% of the traffic utilise the emergency access point it will be a 'nightmare' for residents in the area. 	<p>The proposed emergency access point is a mandatory requirement under the National Construction Code (NCC) to allow for continuous access for emergency vehicles from public road around the entire building.</p> <p>The emergency access point will be used by emergency vehicles such as fire trucks or ambulances in emergencies only. The access point will be controlled by a secure chain and will not be a 'routine entrance or exit point' for customers and heavy vehicles.</p>
Visual Impact	
<ul style="list-style-type: none"> Consider seven storeys to be too large and will have a significant impact on the social fabric and local environment which is being eroded by large developments. Concerned the proposed building is "3 or 4 times higher" than other buildings in the area. Consider the development to be 'oversized' for the area and adjoining residential areas 	<p>The proposed development has been designed with consideration of the surrounding context. The LEP does not identify a maximum building height control for the Site. The proposed seven storey office building has a maximum height of 32.32m which is permissible with consent and consistent with the adjoining development at 76B Edinburgh Road which comprises a five-storey building (originally approved as a six storeys).</p> <p>The office component is situated in the south-eastern corner of the site, away from residences along Smidmore Street and provides an appropriate transition in built form and land use intensity to Marrickville Metro Shopping Centre to the north and adjoining industrial developments to the west.</p> <p>The office has been purposely sited towards the front of the site to minimise the perception of bulk and scale associated with the warehouse located at the rear.</p> <p>When compared to the existing situation, the proposal will have a positive visual impact on Edinburgh Road and adjoining residential areas due to its generous setbacks,</p>

Comment	Response
	<p>location of car parking, high quality landscaping along public roads, façade design, building articulation and high-quality materials.</p> <p>The proposed building height is consistent with the objectives of the height of buildings development standard (Clause 4.3) as:</p> <ul style="list-style-type: none"> ▪ The proposal is consistent with the desired future character of the Sydney Steel Precinct whereby a key objective is to protect existing industrial zoned land, retain existing employment generating land uses, ensure new development is compatible with the operations of Sydney Airport and protect significant streetscapes. ▪ The height, size, scale and setbacks of the development are comparable to surrounding industrial developments and provides a sympathetic presentation to the streetscape without affecting the air safety of Sydney Airport. ▪ The proposal will not cause additional overshadowing to sensitive residential receivers or public domain areas. ▪ The proposal provides an appropriate transition in built form to Marrickville Metro Shopping Centre and adjoining industrial sites. <p>The proposed landscaping has been designed to screen the development from sensitive receivers along Edinburgh Road. As illustrated in the Landscape Plan prepared by Site Image and submitted with the SSDA, a significant canopy of Spotted Gum trees is proposed along Edinburgh Road. These large native trees will provide significant screening to soften the built form. It is also proposed to plant lower height trees in deep soil zones. The mix of spotted gums with a mature height of 25m and lower trees up to 10m will provide significant screening to the development and minimise adverse visual impacts.</p>
Signage	
<ul style="list-style-type: none"> ▪ Concerned the Woolworths sign will glow at night and cause reduced privacy and poorer sleep. 	<p>The proposal seeks approval for ten signs including a combination of directional signs and building identification signs. The signs comprise individual illuminated letters. The Applicant will accept a Condition of Consent requiring all illuminated signs to comply with the relevant Australian standards for lighting to minimise obtrusive effects to sensitive receivers.</p> <p>No illuminated signs are proposed adjoining the residential area to the north-west of the site.</p>

Comment	Response
Residential amenity – visual privacy and headlight intrusion	
<ul style="list-style-type: none"> Consider there to be no analysis of visual privacy, instead only an acoustic report. 	<p>Clause 11 of the SRD SEPP states that DCPs do not apply to State Significant Development. Notwithstanding, consideration has been given to the Marrickville DCP 2011 (MDCP) provisions regarding development with a residential/industrial interface.</p> <p>The MDCP does not contain specific provisions regarding building separation distances however encourages design principles to be incorporated into the design of industrial buildings which adjoin residential development. The proposal has implemented the following principles to minimise visual privacy impacts:</p> <ul style="list-style-type: none"> The warehouse has specifically been located to the rear of the Site, behind the office building to minimise visual and acoustic impacts. It is well distanced from adjoining residential areas to the north by Edinburgh Road (approximately 25m from the boundary). The warehouse and office are set back 49m and 50m respectively from the nearest residential dwellings on Edinburgh Road. An updated acoustic assessment is currently being prepared and will be submitted shortly. The office component is located beyond the Edinburgh Road intersection to avoid direct interface with residential dwellings. The first level of office is located at Level 2 (approximately 8m above the ground plane) to allow carpark levels below to be further setback, with more vegetation fronting Edinburgh Road.
<ul style="list-style-type: none"> Concerned about the visual disturbance generated from the car headlights as vehicles enter and exit the car park. 	<p>The updated SSDA Acoustic Assessment (Appendix J) and accompanying Response to Submissions (Appendix K) provides recommended mitigation measures for night-time truck movements to minimise potential impacts to nearby residents, including:</p> <ul style="list-style-type: none"> Medium trucks accessing the site in a westbound direction on Edinburgh Road during the night time period Heavy trucks accessing and leaving the site via Sydney Steel Road/Edinburgh Road during the night time period
Tree Removal	
<ul style="list-style-type: none"> Concerned the proposal removes trees however no equivalent green area has been designed adjacent to the residential areas to offset the 	<p>Most trees were previously approved for removal under DA 2015/00168. To offset the loss of these trees, a</p>

Comment	Response
<p>impact of the development and loss of vegetation.</p> <ul style="list-style-type: none"> ▪ Concerned the re-development of Marrickville Metro Shopping Centre has already removed a number of large trees along Smidmore Street and have not been replaced. The proposed removal of an additional 66 trees will impact on heat retention and glare of buildings on residents. ▪ Request adequate green space is provided along the footpath including plant height layers to provide a better space for residents, improved aesthetics, reduce heat creation in the area from these new buildings and to partial screen the building. 	<p>comprehensive landscaping scheme has been developed by Site Image.</p> <p>The proposed landscape strategy has focused on enhancing the streetscape presentation of the site and increasing greenery along Edinburgh Road and Sydney Steel Road to provide a better outlook for residences, increase shade provision and partially screen the building when viewed from the public domain.</p> <p>Landscaping within the two primary street frontages is proposed to enhance the streetscape and pedestrian experience along Edinburgh Road and Sydney Steel Road. Several trees are proposed along the Site perimeter, both within the Site boundary and along the public footpath.</p> <p>A passive, outdoor courtyard space is also proposed in the north-east corner of the Site. This space is intended to provide a 'break-out' space for employees of the Site and create a buffer to Edinburgh Road. This area will comprise the following elements:</p> <ul style="list-style-type: none"> ▪ Feature brick paving ▪ Brick planter walls ▪ Shade tolerant plants to be incorporated into the meandering paths ▪ Integration of timber to provide seating <p>A number of trees proposed for removal are located within the Site and are in poor health or lack visual appeal. Accordingly, whilst a number of trees are proposed for removal, it is considered more beneficial to focus on enhancing the streetscape presentation of the Site which will improve residential amenity more so than retaining the trees located within the Site itself.</p>
Community Engagement	
<ul style="list-style-type: none"> ▪ Request the proposal addresses impacts on residents of Bourne Street and Leicester Streets. Any impacts should be minimised and counterbalanced with strategies to give back to residents and the environment. ▪ Request engagement of residents and homeowners in Bourne Street to 	<p>A Visual Impact Assessment was prepared by RobertsDay and submitted with the EIS as Appendix FF. The VIA considered view impacts from the northern end of Bourne Street at 56 Victoria Road looking towards the Site. The aim of assessing this viewpoint was to understand the visual impact of proposed built form when viewed from Enmore Park and Bourne Street residents.</p>

Comment	Response
<p>understand their needs and expectations.</p> <ul style="list-style-type: none"> Understand the importance of the development to the area however currently oppose the development application as it is currently proposed. Request Woolworths consult with 65 Edinburgh Road, Marrickville as and other nearby residences. Consider there to be a lack of community participation. 	<div data-bbox="719 201 1360 394">  </div> <p data-bbox="719 401 862 420">Picture 13 Existing View</p> <div data-bbox="719 426 1360 619">  </div> <p data-bbox="719 646 1399 848">The visual impact for this view was assessed as low as the assessment found the proposed development is largely screened by existing structures and vegetation. The proposal constitutes only a minor component of the view which might be missed by the casual receptor and there is no effect on the overall quality of the scene.</p> <p data-bbox="719 875 1399 1010">The updated SSDA Acoustic Assessment submitted with the Submissions Report (Appendix J) includes measured noise levels at residents setback from Edinburgh Road, including 14 Bourne Street and 10 Leicester Street.</p> <p data-bbox="719 1037 1399 1239">Pre-lodgement consultation took place in June to July 2020, including a letterbox drop to a catchment area which includes Bourne Street. A fact sheet was also distributed to all residences including 65 Edinburgh Road on Thursday 2 July 2020 with an invitation to attend a community information session and details of a dedicated email and phone number.</p> <p data-bbox="719 1266 1399 1503">A follow up briefing of was undertaken on 15 June 2021, with representatives from Woolworths and Urbis (Engagement). Residents from residents in Bourne Street and Leicester Street attended the follow up briefing. The concerns raised regarding cumulative construction impacts, traffic and visual impacts were documented and are addressed within the Submissions Report. These include:</p> <ul style="list-style-type: none"> Preparation of an updated Construction Management Plan (Appendix U). Updated SIDRA modelling to assess the potential impacts of the fourth approach to the signalised intersection of Edinburgh Road and Smidmore Street. Amendments to the TCS Plan to respond to TfNSW requirements. Recommended restrictions on night-time heavy vehicle movements within the updated acoustic assessment.

Comment	Response
	<ul style="list-style-type: none"> Confirmation the emergency access point will be secured by a chain and will not be a 'routine entrance or exit point' for customers and heavy vehicles. Light spill will be properly managed through the strategic location of outdoor lighting and full compliance with Australian Standards for outdoor lighting.
Construction Impacts	
<ul style="list-style-type: none"> Concerned regarding cumulative impacts of construction sites in the vicinity. 	<p>The CBRK traffic counts included traffic associated with construction of Sydney Metro City and South West. Once construction of this project is completed (estimated to be in approximately 2024), construction traffic associated with these activities will cease.</p> <p>There is not likely to be a significant period of overlap between the operation of the proposed development and construction activities for Sydney Metro City and South West. Nevertheless, as noted, the traffic assessment includes traffic from construction activities for this project.</p> <p>An amended Construction Management Plan has been prepared by Root Partnerships and included at Appendix QU.</p>
<ul style="list-style-type: none"> Request regular and adequate management of building waste including regular internal and external audits. 	<p>As outlined in the Preliminary Construction Management Plan prepared by Root Partnerships, a requirement will be set for the selected Contractor to develop a site-specific waste management plan. Regular internal and external audits of building waste will be undertaken.</p>
<ul style="list-style-type: none"> The submission focuses on the recent exposure to significant dust, noise and loss of on-street car parking to construction workers. 	<p>On-site parking will be made available to site workers to minimise occupancy of be provided, and site workers will utilise publicly available street parking in the surrounding the site. Further, where possible, the use of, public transport and car sharing wherever possible will be encouraged.</p>
<ul style="list-style-type: none"> Request alternative parking is provided for construction workers associated with the proposed development. 	<p>Site workers will utilise publicly available street parking in the surrounding the site, public transport and car sharing wherever possible.</p>
<ul style="list-style-type: none"> Particularly concerned regarding dust and debris during strong winds. 	<p>Dust control will be implemented in areas of all active demolition and construction. All works will be undertaken in accordance with a 'Construction Air Quality' sub-plan as part of the Environmental Management Plan. Dust control measures will be implemented as required, and in accordance with <i>Protection of the New South Wales Environment Operations Act</i>.</p>

Comment	Response
	<p>Dust management will be most critical during the demolition and excavation phases of the project. All subcontractors involved with these works will be required to provide Environmental Work Method Statements that specifically address dust management.</p> <p>Methods of reducing dust that will be implemented are provided in the Preliminary Construction Management Plan submitted at Appendix QU.</p>
Built Form	
<ul style="list-style-type: none"> ▪ Concerned the physical development will not align with the submitted photomontages. ▪ Request the development is built to a high quality and consistent with the submitted plans / 3D imagery. 	<p>The proposed development will be constructed in accordance with the submitted architectural plans and schedule of materials and finishes. Visually, it will be consistent with the submitted photomontages.</p>
Roadworks	
<ul style="list-style-type: none"> ▪ Opposed to the expansion of Edinburgh Road to three lanes. ▪ Concerned about cumulative impacts of Marrickville Metro Shopping Centre and proposed development. ▪ Concerned that if third lane to allow vehicles to turn into the development is approved it will create more idling in front of 65 Edinburgh Road and more noise. 	<p>The proposed amended signalised intersection at Edinburgh Road/Smidmore Street, including signalised access to the site, has been designed to consider extensions to Marrickville Metro Shopping Centre.</p> <p>Access from Edinburgh Road is provided for employees and visitors to the staff carpark. Heavy vehicle access will be via Sydney Steel Road.</p>
Political Donations	
<ul style="list-style-type: none"> ▪ Request disclosure of political donations. 	<p>A Political Disclosure Statement was submitted with the application. There are no political donations to disclose.</p>

5. UPDATED EVALUATION OF PROJECT

This Submissions Report has responded to the issues raised within the referral authority, community and public submissions received regarding the proposed redevelopment and is accompanied by:

- Updated architectural drawings which detail the refinements to the original proposal.
- Supplementary reports and memos which provide additional clarification and information regarding technical issues.

The report and the supporting documents have been informed by additional consultation and engagement with key stakeholders including Sydney Water and Registered Aboriginal Parties.

Overall, it is considered the updated proposal is acceptable having regard to the relevant environmental, economic and social considerations:

- The proposal satisfies the applicable State Environmental Planning Policies, and relevant environmental planning instruments that apply to the site. The proposed warehouse use is permitted with consent. The 'office premises' component can be approved in accordance with Clause 4.38 (3) of the EP&A Act.
- The updated proposal remains aligned with the strategic policy objectives as it:
 - Seeks to deliver more efficient supply chains, reduce business costs, increase access to markets and enhance access to a greater number of skilled workers by locating the warehouse and distribution centre in an accessible location close to public transport and residential dwellings.
 - Integrates industrial and ancillary office land uses within close proximity to public transport to facilitate 30-minute cities.
- The updated proposal will not have any unacceptable environmental impacts, as:
 - The proposal presents an appropriate built form in an industrial zoned area.
 - The proposed road infrastructure upgrade works have been designed in consultation with TfNSW to avoid unacceptable traffic impacts and minimise pedestrian and vehicle conflicts.
 - The potential noise impacts have been assessed in detail and satisfactorily address the relevant guidelines, subject to implementation of recommended mitigation measures.
 - The proposal respects the industrial history and character of the place and will not obstruct or impact the vicinity heritage items in any way.
 - The proposal will have minimal visual impact from key locations in the public domain.
 - The siting and design is considered appropriate for the site based on its generous setbacks, high quality landscaping along public roads, façade design, building articulation and high-quality materials.
 - The proposal will not cause additional overshadowing to sensitive residential receivers or public domain areas.
 - The proposal will not result in significant air quality and odour impacts during the construction and operational phases of the development.
 - The proposed development will have no significant impact on current flood volumes, flood depths and existing flood hazard categories up to the 1% AEP storm event.
 - The proposal is not classified as potentially hazardous and the Site can be made suitable for the proposed development.
- The proposal remains suitable for the site as it protects existing industrial land and provides opportunities for the provision of jobs and employment throughout the construction and operational stages.
- The proposed development is in the public interest as the amended proposal will deliver a high-quality development that significantly improves the streetscape presentation of the Site when viewed from Edinburgh Road and Sydney Steel Road.

The additional information provided within the Submissions Report does not modify the conclusions of the planning assessment provided in the Environmental Impact Statement submitted with SSD-10468. Further,

the minor amendment to the building façade alignment does not alter the mitigation measures previously proposed nor do change the overall planning assessment. As such, only minor changes are proposed to the consolidated list of mitigation measures as outlined in Section 9.2 of the Environmental Impact Statement submitted with SSD-10468 (see Appendix B).

Overall, the proposal is in the public interest and should be approved by the NSW DPIE, subject to appropriate conditions of consent.

DISCLAIMER

This report is dated 27 September 2021 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of WOOLWORTHS GROUP LIMITED (**Instructing Party**) for the purpose of Response to Submissions (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

In preparing this report, Urbis may rely on or refer to documents in a language other than English, which Urbis may arrange to be translated. Urbis is not responsible for the accuracy or completeness of such translations and disclaims any liability for any statement or opinion made in this report being inaccurate or incomplete arising from such translations.

Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A

SUBMISSIONS REGISTER



APPENDIX B

UPDATED MITIGATION MEASURES

APPENDIX C

AMENDED ARCHITECTURAL PLANS

APPENDIX D

AMENDED ARCHITECTURAL DESIGN REPORT

APPENDIX E

ACHAR

APPENDIX F

AMENDED STORMWATER MANAGEMENT PLAN

APPENDIX G

AMENDED STORMWATER DRAWINGS

APPENDIX H

AMENDED FLOOD MANAGEMENT PLAN

APPENDIX I

TECHNICAL MEMO - FLOODING

APPENDIX J

UPDATED ACOUSTIC REPORT

APPENDIX K

ACOUSTIC RESPONSE TO SUBMISSIONS

APPENDIX L

ACOUSTIC RESPONSE TO DPIE QUERIES

APPENDIX M

AMENDED TRAFFIC AND ACCESS REPORT

APPENDIX N

CBRK CONSOLIDATED TRAFFIC RESPONSE AND TCS PLAN

APPENDIX O

AMENDED SEPP 33 ASSESSMENT

APPENDIX P

EMERGENCY RESPONSE PLAN – FIRE

APPENDIX Q

AMENDED DRAFT CONSTRUCTION MANAGEMENT PLAN