

Submissions Report

Gardeners Distribution Centre SSD-42544484
546 - 548 Gardeners Road, Alexandria



Prepared for Goodman Property Services (Aust.) Pty Ltd
Submitted to the Department of Planning and Environment

February 2023



This report has been prepared by:



Lauren Donohoe BCP (Hons)
Planner
E: lauren@keylan.com.au

This report has been reviewed by:



Dan Keary BSc MURP RPIA
Director
E: dan@keylan.com.au

Cover image: the site (Source: Grimshaw)

All Rights Reserved. No material may be reproduced without prior permission of KEYLAN Consulting Pty Ltd. While KEYLAN Consulting Pty Ltd working on this project has tried to ensure the accuracy of the information in this publication, it accepts no responsibility or liability for any errors, omissions or resultant consequences including any loss or damage arising from reliance in the information in this report. This report has relied on information provided by Goodman in good faith and accepts no responsibility or liability for any errors, omissions or resultant consequences including any loss or damage arising from reliance in the information in this report.

Revision	Prepared by	Reviewed by	Date	Revision Type
1	LD	DK	10/2/23	Draft
2	LD	DK	22/2/23	Draft
3	LD	DK	27/2/23	Final

Table of Contents

1	Introduction	6
1.1	Proposed Development	6
1.2	Report Structure.....	6
2	Analysis of Submissions.....	8
3	Actions taken since exhibition	9
3.1	Further engagement conducted.....	9
3.2	Refinements and clarification.....	9
3.3	Further impact assessment.....	10
4	Response to submissions	11
4.1	The Project.....	12
4.2	Procedural Matters.....	16
4.3	Economic, Environmental, Social Impacts.....	18
5	Project justification	31
5.1	Strategic context	31
5.2	Economic justification	31
5.3	Social justification	31
5.4	Site suitability	31
5.5	Ecologically Sustainable Development.....	32

Tables

Table 1: Overview of submissions.....	4
Table 2: SEE Report Structure.....	6
Table 3: List of Appendices	7
Table 4: Breakdown of submissions.....	8
Table 5: Categorisation of issues	9
Table 6: Project amendments	10
Table 7: The Project – Response to Submissions	15
Table 8: Procedural Matters - Response to Submissions.....	18
Table 9: Economic, Environmental and Social Impacts - Response to Submissions.....	30

Appendices

Appendix AA	TfNSW Response
Appendix AB	Transport Impact Assessment
Appendix AC	Site Traffic Plan
Appendix AD	Swept Path Assessment
Appendix B	Updated Architectural Plans
Appendix C	Updated Public Art Strategy
Appendix D	Updated Landscape Plan
Appendix E	Updated Civil Report
Appendix F	Landscape Maintenance Guidelines
Appendix G	Plan of Easement
Appendix H	Updated Noise Impact Assessment
Appendix I	Submissions Register
Appendix J	Updated Mitigation Measures

Executive Summary

This Submissions Report has been prepared by *Keylan Consulting Pty Ltd* (Keylan) on behalf of *Goodman Property Services (Aust.) Pty Ltd* (the Applicant) to address the matters raised by Government agencies, Council, the public, and stakeholder groups during the exhibition period for the State Significant Development (SSD) application for a warehouse and distribution facility at 546 – 548 Gardeners Road, Alexandria (the Site).

On 31 October 2022, the SSD application (SSD 42544484) was lodged with the Department of Planning and Environment (DPE). The SSD application was placed on public exhibition from 16 November 2022 to 13 December 2022. During this time, there were seven submissions received from public agencies and councils. No public submissions were received.

An overview of the submissions received is provided below.

Government agencies	Councils
<ul style="list-style-type: none"> • NSW DPE • Heritage NSW • Transport for NSW • Fire and Rescue NSW • Sydney Water 	<ul style="list-style-type: none"> • City of Sydney Council • Bayside Council

Table 1: Overview of submissions

DPE issued letters to the Applicant on 15 December 2022 and 15 January 2023 requesting the Applicant to respond to issues raised in the submissions and by DPE. The key issues include:

- | | |
|--|---|
| <ul style="list-style-type: none"> • Urban design • Public domain • Public art • Easements • Communal open space • Height • Traffic | <ul style="list-style-type: none"> • Noise • Landscaping • Stormwater • Flooding • Servicing • Heritage • Inconsistencies in reports and plans |
|--|---|

Since the completion of the exhibition period, the Applicant has undertaken further consultation with DPE to discuss issues raised in submissions.

This report also provides information on the proposed refinements made to the project as a result of the additional consultation and response to submissions process.

The key changes are summarised below:

- Inclusion of a pedestrian link to connect the western carpark and the warehouse facility
- Additional public art locations
- Further detail on the noise and vibration mitigation measures
- A site wide landscape plan has been provided
- Drainage plans updated to appropriately capture stormwater runoff
- Updated reports and plans to address inconsistencies

Further to the above, an updated justification and evaluation of the project as a whole is included in Section 5 of this report. It is noted that only minor amendments and clarifications have been made as a result of the response to submissions process and the proposal has remained substantially the same. As a result, the proposal is considered consistent with the project justification provided with the original EIS application, as summarised below:

- the proposal supports the development of warehouse and distribution uses, consistent with the site's IN1 General Industrial Zoning and the vision for the City of Sydney's southern employment area
- the proposal is consistent with the strategic planning context including the following strategies:
 - Greater Sydney Region Plan
 - Eastern City District Plan
 - City of Sydney Local Strategic Planning Statement
 - City of Sydney Employment Lands Strategy
- the proposal will facilitate a \$75 million investment into the construction of the site and will facilitate over 24,401m² of employment generating floor space
- the development will support over 241 jobs over the construction period and 359-448 jobs during operation resulting in significant social benefits for the Sydney region
- the site is suitable for the development considering:
- the site's zoning, which permits the proposed uses
- the proposal is consistent with the strategic direction for the locality and broader region
- the proposal is compatible with surrounding development and land uses
- all potential environmental impacts of the proposal can be suitably mitigated within the Site

On the basis of the above, the project continues to comply with the relevant controls and that potential environmental impacts can be appropriately managed through mitigation measures. An updated mitigation measures table is provided at Appendix J.

1 Introduction

This Submissions Report has been prepared by *Keylan Consulting Pty Ltd* (Keylan) on behalf of *Goodman Property Services (Aust.) Pty Ltd* (the Applicant) to address the matters raised in submissions received in response to the exhibition of the State Significant Development (SSD) application for a warehouse and distribution facility (SSD 42544484) at 546 – 548 Gardeners Road, Alexandria (the Site).

On 31 October 2022, the SSD application was lodged with the Department of Planning and Environment (DPE). The SSD application was placed on public exhibition from 16 November 2022 to 13 December 2022. During this time, there were seven submissions received from public agencies and councils.

1.1 Proposed Development

The proposal (as exhibited) seeks to facilitate the construction of a multi-level warehouse and distribution centre, incorporating onsite car parking and ancillary offices. Specifically, the proposed development comprises the following works:

- demolition of all existing structures and buildings on the Site
- construction and operation of a two-storey warehouse and distribution centre, comprising 8 warehouse units, with ancillary offices, including:
 - 24,401 m² of total Gross Floor Area (GFA)
 - approximately 19,844 m² of warehouse GFA
 - approximately 2,686 m² of office GFA
 - maximum building height of 22.6 m
- provision of 90 car parking spaces, 5 accessible car spaces, 8 motorcycle parking spaces and 36 bicycle parking spaces
- site landscaping
- business identification signage

1.2 Report Structure

This Submissions Report has been prepared in accordance with DPE's *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) July 2021*. The structure of the report is as follows:

Section	Overview
Executive Summary	An overarching summary of the report
1 Introduction	A summary of the proposed SSD application and assessment that has been carried out to date.
2 Analysis of Submissions	Analysis of submissions, detailing groups and people who made submissions and categorisation of issues raised in submissions.
3 Actions taken since exhibition	An overview of the actions the Applicant has taken since public exhibition to address the issues raised in submissions.
4 Response to submissions	A detailed summary of the Applicants response to the issues raised in submissions.
5 Updated project justification	An outline of the updated project justification and evaluation of the project, incorporating relevant issues and the Applicants response.

Table 2: SEE Report Structure

This Submissions Report should be read in conjunction with the following supporting documents:

Appendix	Supporting documentation
Appendix AA	TfNSW Response
Appendix AB	Transport Impact Assessment
Appendix AC	Site Traffic Plan
Appendix AD	Swept Path Assessment
Appendix B	Updated Architectural Plans
Appendix C	Updated Public Art Strategy
Appendix D	Updated Landscape Plan
Appendix E	Updated Civil Report
Appendix F	Landscape Maintenance Guidelines
Appendix G	Plan of Easement
Appendix H	Updated Noise Impact Assessment
Appendix I	Submissions Register
Appendix J	Updated Mitigation Measures

Table 3: List of Appendices

.

2 Analysis of Submissions

During the exhibition period, a total of seven submissions were received, all of which were received from councils and government agencies. No public submissions were received. A breakdown of the submissions is provided below.

Submission	Breakdown
NSW DPE	Provided comment and requested additional information.
City of Sydney Council	Provided comment and requested additional information.
Bayside Council	Provided comment. No additional information required.
Fire and Rescue NSW	Provided conditions of consent.
Heritage NSW	Provided comments. No further agency consultation required.
Transport for NSW	Provided comments and conditions of consent following a review of supplementary material that was provided by the Applicant in response to the agency's initial comments.
Sydney Water	Provided comment. No additional information required.

Table 4: Breakdown of submissions

The issues raised in the submissions are categorised in the table below. A response to the issues raised is provided at Section 4 of this report.

Category	Summary of issues raised
The Project	
Urban design	<ul style="list-style-type: none"> Bulk and scale and impact on visual amenity Materiality Relationship with the neighbouring distribution centre
Public domain	<ul style="list-style-type: none"> Impacts of the proposed site exit, vehicular crossings and laybacks on the existing public domain along Gardeners Road
Public Art	<ul style="list-style-type: none"> Provision of public art at the site including how it relates to the locality as well as impacts such as on traffic and heritage
Easements	<ul style="list-style-type: none"> Further details on easements to be provided
Communal open space	<ul style="list-style-type: none"> Insufficient information regarding the design and structure of certain elements
Height	<ul style="list-style-type: none"> Services and plant on roof to be concealed from view
Procedural Matters	
General procedural matters	<ul style="list-style-type: none"> Clarification of some inconsistencies between application documents Detail and location of the proposed public art Additional plans and sections to be submitted Fire study to be developed as a condition of consent
Economic, environmental and social impacts of the project	
Traffic, parking and access	<ul style="list-style-type: none"> The angle of the proposed heavy vehicle exit driveway Construction traffic impacts Vehicle movements and integration with the adjoining site Number and type of bicycle parking spaces
Noise	<ul style="list-style-type: none"> Impact of construction noise on nearby residential dwellings Further modelling to be conducted regarding sleep disturbance Further details on vibration management measures

Category	Summary of issues raised
Landscaping	<ul style="list-style-type: none"> Choice of trees and landscape elements regarding the northern area of the Site Clarification of the number of trees to be removed Planting over pipeline assets Clarification of the deep soil landscaping A deep soil plan is requested Details of a long term maintenance strategy A pedestrian link should be provided between the western carpark and warehouse facilities The removal of trees to be considered as a site constraint Appropriate setbacks from trees Tree assessment and schedule to be updated Tree canopy requirements A detailed sitewide landscape plan is requested
Stormwater	<ul style="list-style-type: none"> Drainage to landscape areas to be confirmed Rainwater tanks to allow rainwater harvesting A stormwater quality assessment is requested
Flooding	<ul style="list-style-type: none"> A site specific flood assessment report is requested Flood lift access requirements Post development modelling to be provided regarding neighbouring properties
Servicing	<ul style="list-style-type: none"> Portable water and wastewater servicing is possible at the Site
Heritage	<ul style="list-style-type: none"> The management recommendations provided are adequate

Table 5: Categorisation of issues

3 Actions taken since exhibition

In response to the key matters raised within the submissions, the Applicant has undertaken minor refinements, amendments and clarification to the exhibited proposal.

This section also outlines any further engagement conducted as well as further assessment of the impacts of the project.

3.1 Further engagement conducted

The Applicant undertook further consultation with DPE on 12 January 2023.

This consultation was for the purpose of seeking clarification on submission commentary from all stakeholders. No particular actions or issues were raised.

3.2 Refinements and clarification

In response to issues raised in the submissions, some minor amendments to the project have been made. However, it is noted that most responses provide clarification or confirmation rather than a design change.

The table below outlines these amendments. These have been categorised by issue.

Given the amendments are minor and are in response to issues raised by DPE and the submissions, they do not warrant a formal amendment of the DA under section 37 of the *Environmental Planning and Assessment Regulation 2021*.

Category	Summary of project amendments
The Project	<ul style="list-style-type: none"> The Architectural Plans have been updated to include a designated pedestrian link from the western carpark to the warehouse facility (Appendix B) The Public Art Strategy (PAS) has been updated to expand the potential locations for public art.
Procedural matters	<ul style="list-style-type: none"> The Landscape Plans, EIS and Arborist reports have been updated to ensure consistency and clarification on proposed tree removal. Other inconsistencies raised in the submissions are addressed in this Submissions Reports and the relevant reports and plans amended accordingly. The inconsistencies include: <ul style="list-style-type: none"> Correct tree removal numbers Correct GFA Correct deep soil area Easements
Economic, environmental and social impacts of the project	<ul style="list-style-type: none"> Further details relating to construction staff parking have been updated in Section 8.3.6 of the Transport Assessment (Appendix A(B)) to provide guidance for the future construction contractor. Further details regarding the project specific construction noise and vibration mitigation measures which could be used to minimise and control the potential impacts have been added to Section 6.1 of the NVIA (refer Appendix H). The Architects have confirmed that the total deep soil provision for the site is 4,969m² or 19.8% of the total Site area A detailed site wide landscape plan has been prepared and provided with the SSDA packaged. The Civil Engineering drainage plan updated to include open swales along the southern, western- and northern boundary to capture stormwater runoff with the landscape area and ultimately discharge into the proposed inground drainage system, similar to the proposed drainage in the north-eastern landscape area.

Table 6: Project amendments

3.3 Further impact assessment

The issues raised in the submissions and in DPE's comments have been assessed and the following documents have been provided to reflect this:

- Transport Impact Assessment (Appendix AB)
- Site Traffic Plan (Appendix AC)
- Swept Path Analysis (Appendix AD)
- Updated Architectural Plans (Appendix B)
- Updated Public Art Strategy (Appendix C)
- Updated Civil Report (Appendix E)
- Landscape Maintenance Guidelines (Appendix F)
- Plan of Easement (Appendix G)
- Updated Noise Impact Assessment (Appendix H)
- Updated Mitigation Measures (Appendix J)

The results and findings of the actions discussed in Section 3 of this report are discussed further in Section 4.

4 Response to submissions

This section provides a detailed summary of the Applicant's response to the issues raised in submissions.

The tables in this section have been structured in accordance with the categories identified in Section 2.

4.1 The Project

Ref.	Summary of submission	Response
A	Urban design	
A1	<p>The proposal includes significant bulk and scale due to the large footprint and height of the multi-level warehouse.</p> <p>The northern façade does not relate to the visual amenity of the adjoining industrial warehouse. Visual impacts should be further assessed and alternative design, colours and landscape elements are recommended to address this interface.</p>	<ul style="list-style-type: none"> • A contemporary architectural language is proposed with a consistent, integrated building expression between the North and South facades to the Gardeners Road Multi-Level warehouse. • While the use of masonry construction in 63 Campbell Road is typical of that era of industrial buildings, the urban form and architectural character of the locality is varied. • The proposal does not attempt to mimic the use of masonry. Rather, the design intent is for a contemporary material palette in keeping with the future of industrial buildings in the multi - level typology. The timber, clear façade glazing, and light bronze-coloured mullions set against the minimal simplicity of the large warehouse volumes of light grey precast concrete and metal cladding are complementary to 63 Campbell Road. Furthermore, the contrasting use of materials in the proposal enhances the public domain by providing visual interest. • The design features a mass timber structure to the office area that is visible through the transparent facade, a sustainable design approach that imbues the warm natural character of timber to the material palette. Considerable design coordination has been undertaken to ensure the transparency of the façade glazing to ensure the timber is clearly visible from the exterior. The timber colour relates to brown tones of the nearby masonry and is complementary. • In addition, the mullions and sunshade articulation are light bronze-coloured. The mullion colour relates to brown tones and is complementary. • The warehouse volumes feature a light grey precast concrete datum wall at its base with grey metal cladding at higher levels. The concrete and metal cladding are neutral and compatible with brown tones. • It is unusual to require 2 unrelated, non-heritage buildings to match in terms of colours and materials, particularly where one building is an older building and the other of modern design. • It is also unreasonable to amend the architectural expression of the entire building, which has a Gardeners Road frontage, in order to address a separate building at the rear which has limited frontage to Gardeners Road. Furthermore, the proposal

Ref.	Summary of submission	Response
		<p>will have limited visibility from Campbell Road public domain due to significant building setback and retained mature trees screening the norther façade in the foreground, creating a clear break in visual architectural language between the sites.</p> <ul style="list-style-type: none"> • It should also be noted that a modern café proposed to the frontage of Campbell Rd will be visible from the public domain – limiting the view of the original brickwork of the 63 Campbell Road warehouse. • Furthermore, the juxtaposition of an older style warehouse with a new modern warehouse enhances the public domain by providing visual interest.
B	Public domain	
B1	Design and position of the proposed site exit, vehicular crossings and laybacks to be considered in relation to the existing public domain along Gardeners Road.	<ul style="list-style-type: none"> • Detailed design to be coordinated during construction. • It is noted that the new vehicular crossovers will be constructed on Gardeners Road, which is an asset owned by TfNSW.
B2	Coordination with recent approval at neighbouring site is to be undertaken, to ensure there are no conflicts.	<ul style="list-style-type: none"> • The location of the brigade set down location within the 63 Campbell Road site will be informed by current and ongoing engagement with Fire Rescue NSW. • It is currently proposed to utilise the existing location as outlined within D/2021/525.
C	Public Art	
C1	The proposed public art is not considered sufficient in some aspects of the proposal and should be updated accordingly.	<ul style="list-style-type: none"> • The Public Art Strategy (PAS) has been updated to expand the potential locations for public art. The relevant location will be refined and resolved once the PAS is progressed, and a preferred artist selected. • Goodman will work with City of Sydney Council in refining the public art strategy following SSD approval. • The warehouse facades are not considered an appropriate location for public art noting the significant screening of the retained trees along the Gardeners Road frontage. • In light of the site context and surrounds, public art may be incorporated into the proposal in line with the Preliminary Public Art Plan (PPAP) that has been updated (refer to Appendix C). • We invite a relevant condition of consent for the public art strategy to be developed and refined at Construction Certificate stage as outlined within the EIS. It is not appropriate for this level of detail to be provided at DA stage.

Ref.	Summary of submission	Response
		<ul style="list-style-type: none"> The public art opportunity is exclusive to First Nations artists and local First Nations community consultation has been completed in conjunction with UAP and Goodman's internal Head of Indigenous Engagement. A best practice approach will be considered for Copyright, Moral Rights and ICIP.
C2	A budget of \$500,000 has been identified and is not commensurate with the scale of the development. With the Cost of Construction estimated at \$75,480,000 the proponent is encouraged to increase the public art budget to reflect a budget that is commensurate with the scale and nature of the development in line with the international best practice standard of 1%, i.e. \$754,800, the necessary level of investment to achieve high quality public artworks.	<ul style="list-style-type: none"> The Sydney DCP 2012 including Public Art requirements do not apply to the proposal. Therefore, while Goodman are prepared to incorporate public art into the proposal, it is not beholden to the DCP and therefore inappropriate to condition a 1% of total CIV prescribed cost of art work. However, the proponent is confident a high quality public artwork can be procured with the proposed budget.
D	Easements	
D1	<p>Right of Way Easement is to be created in order to facilitate the ongoing vehicle movements to and from the subject site.</p> <p>Further information is to be provided and clear and detailed information is sought advising which easements are to be moved, which easements are to be extinguished and how the site intends to satisfy any legal requirements of any instruments existing on the site to accommodate the proposed development.</p>	<ul style="list-style-type: none"> The Applicant is happy to consider the inclusion of a Right of Way ("ROW") easement on title of the adjoining site at 63 Campbell Road. Please refer to Appendix G for a copy of the Plan of Easement. The Applicant proposes a relevant condition of consent be included, requiring the 88B document to be lodged with the Land Registry Service (LRS) prior to Occupation Certificate. The submitted survey does not show any easements that encumber the proposed site. The survey shows existing private services that benefit the existing building, however these are not protected by an easement. Therefore, it is not proposed to amend or remove any existing easements on the site.
E	Communal open space	
E1	The proposed roof terraces on the north and south buildings appear to comply with the requirements of Section 5.8.3.6.4 of the Sydney DCP 2012 relating to private	<ul style="list-style-type: none"> Noted.

Ref.	Summary of submission	Response
	communal open space in IN1 General Industrial zones. The roof terraces are accessible by lift or stairs from office areas below, and the design allows for seating areas, landscaping and shade structures.	
E2	<p>However, there is insufficient information regarding the following:</p> <ul style="list-style-type: none"> • Clarification is required regarding the design of the roof terraces in terms of sections and details • for rooftop structures including walkways, balustrades and shade structures. • Updated plans are to be provided with levels (SSL, RL and TW), typical planter details and • rainwater outlets connected to the stormwater system. <p>Confirmation is required regarding the soil volume for all new trees to comply with the Landscape Code Volume.</p>	<ul style="list-style-type: none"> • The design of the roof terrace planters is to be developed during design development phase. • The architects have allowed for a 400mm minimum set down for placement of planter modules. The soil depths will be minimum 300mm (allowing for planter drainage cells, waterproofing and the like) with mounding to accommodate planting of tree ferns and medium sized shrubs. Confirming the design of the planters will comply with volume requirements as outlined in the CoS Landscape Code.
F	Height	
F1	<p>It is noted that the proposal exceeds the 18m height control on the northern portion of the site. The City raises no objection to the height exceedance, subject to all services and plant (excluding PVs) being concealed from views from the public domain. This needs to be demonstrated in any future submission of additional information.</p>	<ul style="list-style-type: none"> • Noted • All roof top services (including smoke extraction fans and solar PV) have been included in the Visual Impact Assessment (VIA) modelling. As demonstrated by the VIA assessment, there is no plant visible from the public domain.

Table 7: The Project – Response to Submissions

4.2 Procedural Matters

Ref.	Summary of submission	Response
G1	<p>The EIS Summary lists states the proposal includes 24,401 m² of total Gross Floor Area (GFA), however the Project Justification section in the EIS states the development will provide over 24,412 m² of employment generating floor space, please clarify the correct GFA.</p> <p>The Aboriginal Heritage assessment states the proposed development includes two (2) storey warehouses split into eleven (11) units, with 20,100 sqm of total warehouse area and 2,820sqm of ancillary office area, please clarify the inconsistency with the description in the EIS and whether this would alter the conclusions of the heritage assessment.</p>	<ul style="list-style-type: none"> The correct GFA figure is 24,401m²
G2	There is no reference on the architectural plans regarding the solar panel's mountings (flush or angled mounting), as a result the visual impact of these panels cannot be assessed.	<ul style="list-style-type: none"> The VIA included with the EIS includes modelling of both the rooftop plant and solar unit. The model assumes the solar is installed at a 5% pitch in accordance with design advice provided by solar system installer. The VIA demonstrates that this infrastructure is not visible from the public domain. This is primarily due to the roof form which acts as a visual screen to hide it from the public domain.
G3	The development includes provision for 90 car parking spaces, however, the architectural plans only demonstrate 88 car spaces. Please clarify the total car parking to be provided and demonstrate the accurate quantity of car parking spaces on the architectural plans.	<ul style="list-style-type: none"> 90 car spaces are to be provided. The architecture plans have been updated to confirm this.
G4	A public domain levels and gradients plan is to be submitted, which is to include cross sections through driveways and building entrances from	<ul style="list-style-type: none"> Please refer to Appendix E, which confirms relevant interface gradients. Detailed design is to be progressed at CC stage.

Ref.	Summary of submission	Response
	inside the building to the centreline of the road carriageway. The existing and proposed boundary levels, top of kerb levels and invert of gutter level are to be clearly shown, and the proposed flood planning level is to be indicated in the sections. Longitudinal sections showing existing and proposed boundary levels, top of kerb levels and back of footpath levels on the same longitudinal section must be submitted for frontage along Gardeners Road and the private road at 63 Campbell Road.	
G5	A comprehensive Fire Safety Study (FSS) is developed. The FSS is to be developed in accordance with the requirements of Hazardous Industry Planning Advisory Paper (HIPAP) No.21 and is to meet the operational requirements of FRNSW.	<ul style="list-style-type: none"> Noted
G6	The development of the FSS considers the operational capability of local fire agencies and the need for the facility to achieve an adequate level of on-site fire and life safety independence.	<ul style="list-style-type: none"> Noted
G7	The FSS be submitted, reviewed, and meet the operational requirements of FRNSW prior to any further submission being made to FRNSW; this includes: an Initial Fire Safety Report (IFSR) and / or Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ).	<ul style="list-style-type: none"> Noted
G8	That the development of a FSS be a condition of consent.	<ul style="list-style-type: none"> Noted
G9	That a comprehensive ERP is developed for the site in accordance with HIPAP No.1.2.	<ul style="list-style-type: none"> Noted

Ref.	Summary of submission	Response
G10	That an Emergency Services Information Package (ESIP) be prepared in accordance with FRNSW fire safety guideline – Emergency services information package and tactical fire plans.	<ul style="list-style-type: none"> Noted

Table 8: Procedural Matters - Response to Submissions

4.3 Economic, Environmental, Social Impacts

Ref.	Summary of submission	Response
H	Traffic, parking and access	
H1	TfNSW submitted a response to the EIS stating it does not support the proposed development in its current form as the angle of the proposed heavy vehicle exit driveway to Gardeners Road is less than 90 degrees and does not comply with Australian Standards. While email correspondence between the Applicant and TfNSW has been received from the Applicant to state that the heavy vehicle exit is now supported by TfNSW, until such time as a formal response from TfNSW is received, the concerns remain outstanding and are required to be addressed.	<ul style="list-style-type: none"> TfNSW have sent through a second formal submission (ref: TfNSW Reference: SYD21/01435/05 & DPE Reference: SSD-42544484) confirming they are now satisfied with the proposed access arrangements (refer Appendix G).
H2	Construction traffic impacts have not been adequately quantified/addressed within the EIS or the submitted Traffic Impact Assessment. This is particularly important as multiple construction sites are anticipated to be located within close proximity to the subject site. As a result, further information is required to confirm the estimated time period of construction, and that issues unique to construction have been adequately considered as part of the EIS (e.g.	<ul style="list-style-type: none"> A construction contractor has not yet been engaged for the proposed development. At this stage, an estimated time period of construction cannot be accurately provided as it will largely be dependent on the construction contractor's proposed methodology and available timing. However, construction market engagement has informed a project delivery timeline of approximately eighteen (18) months, with the proposed commencement in early Q3 2023. The project is therefore targeted to complete Q4 2024. Likewise, limited details of construction worker parking are available at this stage. It will be the responsibility for the construction contractor to ensure either sufficient

Ref.	Summary of submission	Response
	<p>whether sufficient construction worker parking can be provided on-site during works, or if specific management/car reduction measures will be required to facilitate construction of the development).</p>	<p>parking is provided on-site, or alternative arrangements made such as public transport use.</p> <ul style="list-style-type: none"> • Further details relating to construction staff parking have been updated in Section 8.3.6 of the Transport Assessment (Appendix A(B)) to provide guidance for the future construction contractor to consider. These details include: <ul style="list-style-type: none"> ○ Justification of increased public transport mode for workers due to proximity to Mascot Train Station (500m walking distance, 7 minute walk) ○ Limited availability of on-street parking expected to result in reduced private vehicle mode (most on-street parking within walking distance of the site only permits 1P parking) ○ Recommendations for prioritising carpooling ○ Recommendations for storage of tools and plant as practicable on-site to minimise individual vehicle transportation required ○ Establishment of on-site designated set-down areas to identify separated construction worker parking areas ○ Recommendations for off-site parking and private shuttle service if required and if practicable • Upon engagement of a construction contractor, this information can be further developed in a detailed Construction Pedestrian Traffic Management Plan. This aligns with the TfNSW letter (refer 'Tab A' of Appendix A(A)) which recommends a condition of consent for this report to be prepared prior to "construction certification" or "any preparatory, demolition or excavation works". • Goodman agrees to such a condition.
H3	<p>The development proposes the utilisation of the I's (63 Campbell Road, Alexandria) private road for vehicle entry and exit. However, no details demonstrating how vehicle movements will integrate with the adjoining site's operational vehicle movements nor details on the integration with the existing Green Travel Plan, Loading Dock Management Plan and Pedestrian and Cyclist Safety Management</p>	<ul style="list-style-type: none"> • At the time of this response, the 63 Campbell Road development (Southend Distribution Centre) does not have a Green Travel Plan (GTP) or Pedestrian and Cyclist Safety Management Plan (PCSMP) (noting the former is required prior to OC and the latter prior to CC for that site) • The project team will work with the Southend project team to ensure alignment in strategy and operational procedures (as relevant) when developing the GTP or other related reports for each development site. • A Preliminary Parking & Loading Dock Management Plan (prepared by Ason, ref: P1376r03v01, dated 31/08/2021) has been prepared for the Southend development. This report has been reviewed and operational requirements

Ref.	Summary of submission	Response
	Plan of 63 Campbell Road, have been provided.	<p>considered in the design of the proposed development. One of the key elements is the safe and efficient operational traffic movement for Southend and how the proposed development integrates with this.</p> <ul style="list-style-type: none"> To this effect, swept path assessment has been prepared previously (drawing 1376-03-v01, dated 25/08/2021 – see Appendix A(C)). This drawing illustrates the interface between Southend and the proposed development and the operational movements for the Southend development. Importantly, the following is noted: <ul style="list-style-type: none"> Loading for the unit directly adjacent to the interface between the two sites is unaffected by the proposed development's traffic movements (sheet 2 and 4) Access to the Southend development is not hindered by the proposed development's access arrangements (sheet 2 and 4) Sheet 4 of the 1376-03-v01 drawing has been reproduced with the updated plans (drawing AG1881-07-v01, Appendix A(D) to demonstrate the interface continues to operate as previously designed.
H4	<p>TfNSW has reviewed the submitted documents and does not support the proposed development in its current form as the angle of the proposed heavy vehicle exit driveway to Gardeners Road is less than 90 degrees and does not comply with Australian Standards.</p> <p>Upon receipt of amended plans depicting this exit driveway at right angles, TfNSW will review and provide a response accordingly. If required, TfNSW is willing to facilitate a meeting to discuss this access arrangement in further detail.</p>	<ul style="list-style-type: none"> TfNSW have provided a second formal RFI response, dated 19.12.22 (ref: TfNSW Reference: SYD21/01435/05 & DPE Reference: SSD-42544484), confirming they are now satisfied with the proposed access arrangements and provide their concurrence (Appendix AA).
H5	Reference is made to the applicant's correspondence of 13 December 2022 (Appendix A) in response to Transport for NSW (TfNSW) previous submission of 12 December 2022 regarding the exhibition of	<ul style="list-style-type: none"> Noted.

Ref.	Summary of submission	Response
	the Environmental Impact Statement associated with the abovementioned State Significant Development. TfNSW has reviewed the supplementary information provided by the applicant and provides concurrence to the proposed civil works on Gardeners Road, subject to conditions which are outlined in TAB A along with suggested conditions for inclusion in any consent.	
H6	While the development proposes a compliant number of bicycle parking spaces and end of trip facilities, the application does not specify the numbers by type. A minimum of 21 employee spaces (17 for office staff and 4 for warehouse staff) and 8 visitor parking space for office visitors is required.	<ul style="list-style-type: none"> The architectural plans illustrate 36 bicycle spaces in total, 26 within the end of trip facility (EOTF) and 10 located externally, close to the building entrances. This appropriately provides for (and exceeds) the minimum 21 employee and 8 visitor spaces per the DCP.
H7	Staff bicycle parking is to be Class 2, and visitor bicycle parking should be Class 3 and located in a publicly accessible area in proximity to the building entrance.	<ul style="list-style-type: none"> The 26 employee spaces are proposed in an enclosed and secure EOTF and the 10 visitor spaces are publicly accessible and located in proximity to the building entrance, hence meeting the Class 2 and Class 3 requirements.
H8	Additionally, clarification is required regarding the maximum size of vehicles to be used on each of the access and egress routes.	<ul style="list-style-type: none"> The maximum size vehicle to access and egress all routes are 20m articulated vehicles (semi-trailers).
I	Noise	
I1	Given this development application is undertaking construction with demonstrated noise impacts to nearby residential dwellings, the assessment must provide certainty construction exceedances can be managed with the aim of achieving the noise management levels set out in the Interim Construction Noise Guideline. Further	<ul style="list-style-type: none"> At this early stage of the project, detailed information regarding the construction methodology, specific work phases, duration of works, etc, is not known. The scenarios that have been assessed are indicative of the likely main stages of works and represent one way that the proposal could be built. Specific details regarding the construction methodology will not be known until a contractor is engaged, which would occur post-approval. The assessment has been completed with reference to the requirements of the Interim Construction Noise Guideline. The assessed construction scenarios are

Ref.	Summary of submission	Response
	<p>information on the construction noise assessment of works must be provided, including details of the worst-case construction activity during each phase of construction, duration of noise impact, analysed meteorological data, activities that may be particularly annoying to residents, noise management processes demonstrating that exceedances can be managed, and a table detailing the potential range of noise reduction values for each mitigation and management measure.</p>	<p>considered representative of the likely realistic worst-case construction impacts that would occur during construction and the construction scenarios that are likely to exceed the construction Noise Management Levels have been identified.</p> <ul style="list-style-type: none"> • Further details regarding the project specific construction noise and vibration mitigation measures which could be used to minimise and control the potential impacts have been added to Section 6.1 of the NVIA (refer Appendix H). • Specific mitigation details for the project would be included in the Construction Noise and Vibration Management Plan (CNVMP) which would be prepared by the construction contractor engaged to build the project before any work begins. The CNVMP would identify all potentially impacted receivers, assess the potential noise and vibration impacts from the various construction scenarios and provide details regarding how the impacts would be minimised through the use of all feasible and reasonable mitigation measures.
12	<p>The Noise and Vibration Impact Report identifies there is the potential for sleep disturbance to occur due to noise level events relating to heavy vehicle movements and loading dock activities. Further modelling is required to demonstrate that the proposed mitigated scenario is able to achieve compliance with the relevant project noise levels.</p>	<ul style="list-style-type: none"> • The NVIA has completed a sleep disturbance impact assessment as per the requirements of the Noise Policy for Industry (NPfI) in Section 5.3.2. The NPfI defines the sleep disturbance screening level as 52 dBA LAFmax or the prevailing background level plus 15 dB, whichever is greater. Where the sleep disturbance screening level is exceeded, the NPfI requires a detailed maximum noise level assessment to be completed, which should cover the maximum noise level, the extent to which the maximum noise level exceeds the RBL, and the number of times this happens during the night-time period. Maximum noise levels from the proposal were predicted to exceed the sleep disturbance screening level and a detailed maximum noise level assessment was therefore completed (see Section 5.3.2.1 of the NVIA). • The detailed maximum noise level assessment indicated that maximum noise levels from truck movements and airbrakes are expected to occasionally be above the levels that would be considered to have the potential to impact sleep at some of the nearest receivers. It was, however, noted that the predicted noise levels assumed heavy trucks whereas the majority of night-time deliveries are expected to be via rigid trucks which are substantially quieter, and generally do not use airbrakes. • The predicted worst-case maximum noise levels were from heavy trucks entering and exiting the site from Gardeners Road. The site was previously used for industrial purposes with 24/7 operation and existing maximum noise levels from

Ref.	Summary of submission	Response
		<p>heavy vehicles accessing the previous site during the night-time period are comparable to the predicted impacts from the proposal.</p> <ul style="list-style-type: none"> • Additionally, existing maximum noise levels adjacent to Gardeners Road were measured to frequently be in the order of 75-80 dBA (likely from existing heavy vehicles), which is higher than the predicted development related maximum noise levels (worst-case maximum noise level predictions were 63-72 dB). • Specific mitigation measures (Site Layout and Operational Noise Management Plan) were recommended to be applied to the site which would assist in minimise potential sleep disturbance impacts. These have already been considered and implemented within the operations and design of the development. • Based on the above, the predicted infrequent sleep disturbance exceedances were considered of low significance, unlikely to result in significantly adverse impact, and does not warrant any further specific mitigation measures.
I3	<p>It is noted that the nearest commercial and industrial buildings are located within the minimum working distance for cosmetic damage and human comfort. The nearest residential receivers along Gardeners Road while outside the minimum working distance for cosmetic damage are within the human comfort minimum working distance. Further information is required to detail the specific vibration management measures that are to be incorporated in order to minimise vibration impact from construction activities to the nearest receivers.</p>	<ul style="list-style-type: none"> • Further details regarding the project specific construction noise and vibration mitigation measures which could be used to minimise and control the potential impacts have been added to Section 6.1 of the NVIA (Appendix H).
J	Landscaping	
J1	<p>There is a discrepancy within the EIS and associated reports regarding the number of trees to be removed as a result of the development. The Arborist Report states 81 trees are to be removed, with 97 trees to be retained. Please clarify the total amount of</p>	<ul style="list-style-type: none"> • The Landscape Plans, EIS and Arborist reports have been updated to ensure consistency and clarification on proposed tree removal. • The Arborist, Civica, have reviewed the arborist report and confirm there are 81 trees proposed for removal and 97 for retention. There are also 29 trees that are exempt (refer to 5.4 of the AIA). Therefore, no update to the arborist report is required.

Ref.	Summary of submission	Response
	trees to be removed and the number of replacement trees for the development	<ul style="list-style-type: none"> The architecture and landscape plans have been updated to ensure consistency with the arborist report.
J2	Canopy trees are proposed to be sited within designated easement areas for multiple services. Confirmation that the landscaping within these easement areas satisfy the guidelines and technical requirements for planting over pipeline assets, while providing appropriate area for canopy trees to reduce the size and scale of the proposed warehouse.	<ul style="list-style-type: none"> Civica have reviewed the proposed tree planting and confirm they are satisfied that the trees are located at required distances from pipeline locations to ensure healthy growth.
J3	The deep soil areas of the development are to be accurately determined. The EIS summary section Assessment of Impacts – Landscaping and vegetation states 3832 m ² deep soil is to be provided as part of the development, whereas section 3.3.2 of the EIS states 3,798 m ² (15.2%) of deep soil area is to be provided. The architectural plans state 3780 m ² (15.06%) of deep soil is to be provided. Clarification of deep soil landscaping is required and demonstrated in a detailed sitewide landscape plan.	<ul style="list-style-type: none"> The Architects have confirmed that the total deep soil provision for the site is 4,969 m² (19.8%) (refer to drawing AOS 1007 'Deep Soil Plan', Appendix B)
J4	Provide details of the long-term maintenance strategy for landscaping for the site particularly the landscaping along the Gardeners Road, Southend Distribution Centre frontage and Level 4 terrace gardens areas.	<ul style="list-style-type: none"> Please refer to Appendix F which outlines the maintenance strategy for the future contractor maintenance.
J5	There is no designated pedestrian link from the western carparking spaces to the warehouse facilities. The submitted architectural plans should be updated to demonstrate that a formal pedestrian path can be provided between these areas.	<ul style="list-style-type: none"> The architectural plans have been updated to include a designated pedestrian link from the western carpark to the warehouse facility (Appendix B).

Ref.	Summary of submission	Response
J6	The proposed development results in the removal 73 trees. 11 of these trees to be removed are of high retention value, as identified in the submitted Arboricultural Impact Assessment (AIA). As outlined in the AIA, high retention value trees should be considered as a site constraint and it may be required that alterations to the proposed development design and/or specific protection measures are undertaken to allow for the retention of these trees.	<ul style="list-style-type: none"> The maximum number of trees are proposed to be retained, measured against the operational and access requirements of the facility.
J7	The City consider that design modifications be explored to ensure appropriate setbacks are provided from these trees, as well as tree sensitive constructions be applied to allow for the retention of these trees.	<ul style="list-style-type: none"> The architectural plans have included appropriate setbacks from proposed retained trees informed by coordinated advice with the arborist.
J8	The AIA should be updated to provide an assessment of the impact of these trees in line with of Australian Standard 49702009 Protection of trees on development sites and outline recommendation for tree sensitive construction adjacent to trees with major encroachments to the Tree Protection Zones.	<ul style="list-style-type: none"> Section 7.3-7.6 of the AIA includes commentary in line with the City of Sydney Tree Removal and Planting recommendations for sensitive construction. detail. This includes recommendations on excavation techniques, surface changes, fencing, and trunk and ground protection.
J9	Section 3.5.2 of the Sydney DCP 2012 requires tree canopy cover be considered and provides at least 15% canopy coverage of a site within 10 years from the completion of development.	<ul style="list-style-type: none"> A total of 4487.1m² (17.87%) canopy cover is provided, greater than the 15% DCP requirement.
J10	Noting to reduce urban heat island effects and mitigate a warming climate, all developments located outside of Central Sydney are to contribute greening to achieve a 40% green cover, including 25% canopy cover by 2050.	<ul style="list-style-type: none"> Noted

Ref.	Summary of submission	Response
J11	It is required that a canopy cover loss and replacement analysis is prepared and submitted that demonstrates the proposed replacement canopy cover at 10 years.	<ul style="list-style-type: none"> 81 trees are proposed for removal with 97 for retention, an additional 39 trees are proposed to be added as part of the proposed development. As above, this will provide 17.87% canopy cover, more than the DCP requirements and significantly more than is typical for industrial development.
J12	The landscape plans indicate that 9 new trees are proposed, using 3 tree species and only 1 is a large sized tree species. The majority of new plantings are understory species. Section 5.8.3.7 (7) of the Sydney DCP 2012 requires that, in addition to perimeter planting, one medium sized be planted and maintained in deep soil with a minimum 3m dimension, and for every four parking spaces another medium sized tree be planted.	<ul style="list-style-type: none"> Deep soil provision has been calculated using the minimum 3m dimension requirement. 39 new trees are proposed to be planted, majority of these are medium sized Banksia species to align with the historic ecological community, Eastern Suburbs Banksia Scrub.
J13	There are 90 car parking spaces at grade of which 38 are open to the sky. The control requires 910 trees; however, no new medium sized trees are proposed to car parking spaces. Confirmation is requires that replacement tree planting includes an increase in new medium and large tree species and submit an updated plant schedule with mature height and spread of all trees and quantities. It is also required that an amended parking layout is submitted that makes allowance for tree planting and a compliant scheme.	<ul style="list-style-type: none"> Due to site constraints and the decision to retain as many existing trees as possible, car parking numbers are curtailed and are less than that permissible by the Sydney LEP. To provide trees within the car parking spaces would further reduce car parking numbers and is therefore unfeasible. The significantly tree planting at the site (17.9% canopy cover) will, together with significant scale of the proposed multi storey warehouse, provide shading amenity for the at grade parking. It is noted that the car park tree requirement is a DCP control which doesn't strictly apply to the proposal.
J14	Section 5.8.3.6.1 of the Sydney DCP 2012 requires lots located in IN1 General Industrial zones to provide a minimum of 15% of the site area as unimpeded deep soil. The deep soil should be located in the front landscape setback and external breakout spaces with a 3 metre minimum dimension in any direction.	<ul style="list-style-type: none"> A total of 4,969sqm (or 19.8%) of the site is provided as deep soil. (Appendix D). The deep soil has been calculated in accordance with the DCP, providing a width of at least 3m.

Ref.	Summary of submission	Response
J15	Without measuring all landscape areas free of rainwater tanks and drainage devices, it is difficult to confirm the deep soil numeric as stated in the submitted EIS. The architect's plans include a landscape plan (dwg SSDA02 1004 [A]) however it does not identify unimpeded deep soil areas. The landscape plans outline the works at grade in deep soil zones, however, these include raingardens or wetlands on the eastern boundary that may reduce deep soil provision.	<ul style="list-style-type: none"> The architecture plans have been updated to confirm the area and percentage of deep soil planting. The deep soil has been calculated in accordance with the DCP – refer to above discussion.
J16	The SEARs included the requirement for a detailed sitewide landscape plan, however the subject application is not accompanied by this. Please submit for review.	<ul style="list-style-type: none"> A detailed site wide landscape plan has been prepared and provided with the SSDA packaged – refer Appendix D.
K	Stormwater	
K1	The submitted civil storm water drainage plan makes no allowance for drainage to landscape areas of the site including raingardens and WSUD devices proposed by the landscape architect. Coordination is required to ensure that all landscaped areas of the site have drainage provision and allows for irrigation (that complies with Section 5.8.3.6.1 of the Sydney DCP 2012). The plans also indicate a ground rainwater tank on the northwest of the warehouse and to the southwest in garden bed, however is not clear if this tank makes allowance for rainwater harvesting from the two warehouse roofs for irrigation reuse.	<ul style="list-style-type: none"> All landscaped areas will be constructed with subsoil drains and cleaning eyes to drain any water which infiltrates the soil/landscape areas. The layout of the subsoil drainage system will be confirmed during the detail design stage. The Civil Engineering drainage plan will also be updated to include open swales along the southern, western- and northern boundary to capture stormwater runoff with the landscape area and ultimately discharge into the proposed inground drainage system, similar to the proposed drainage in the north-eastern landscape area. The runoff from the landscaped area in the northern-eastern corner is currently shown to be captured and drained via an open swale and discharge into the proposed in-ground drainage system at pit A20. Refer to drawing CO13977.02-SSDA40, included in Appendix E
K2	The City has adopted MUSIClink for assessing Water Sensitive Urban Design (WSUD) compliance for developments. A storm water	<ul style="list-style-type: none"> Refer to the Civil Engineering Report (Appendix E) incorporating the site-specific Water Cycle Management Strategy for SSD-42544484 detailing the Water Sensitive

Ref.	Summary of submission	Response
	quality assessment for the proposed development must be prepared and comply with the City's specific modelling parameters as adopted in MUSIClink. A certificate and/or report from MUSIClink and the electronic copy of the MUSIC Model must be submitted for review and approval with the storm water quality assessment report.	<p>Urban Design (WSUD) compliance (stormwater quality assessment) for the proposed development.</p> <ul style="list-style-type: none"> See electronic copy of the MUSIC model (Appendix E) (electronic file named 13977.02-Rev2.rtz) for review. The Stormfilter Chamber was revised to be two OceanProtect 3.35m dia. manholes (or similar approved) instead of the initial OceanProtect precast vaults proposed. The site-specific MUSIC model configuration and parameters with the extracted MUSIClink report/certificate are included at Appendix E.
L	Flooding	
L1	The submitted Water Cycle Management Strategy report provides comments regarding existing flooding condition for the subject site. The City does not support the preparation of the report using information extracted from flood maps available in the City's flood study reports. Instead, a site specific floor assessment report is required that contains flood modelling for pre and post development scenarios and is based on the City's Truflow model.	<ul style="list-style-type: none"> Both the September 2020 "Alexandra Canal Catchment Flood Study Model Update – ARR2019 Hydrology" report as well as the M5 EIS SSI-6788 Flood Impact Assessment completed by Lyall and Associates on behalf of TfNSW was referenced to determine the extent of flooding on the existing site during the 1% AEP and PMF storm events. No mainstream flooding associated with the Alexandra Canal is noted within the site, with only minor ponding of water (typically less than 150mm, locally up to 300mm) demonstrated in the external portions of the existing site. This ponding demonstrated in the results are a function of the flood model setup not including in-ground lot drainage. The ponding shown in the Council & TfNSW Models is therefore indicative of surface water runoff and ponding which would be collected and conveyed by site drainage systems. With reference to the flood studies mentioned above, the development site will not be affected by flooding during the 1% AEP storm event.
L2	Recommended flood planning level/s are to be determined in accordance with Section 5 of the City's Interim Floodplain Management Policy, and the assessment is to address the requirements of Section 6 of the Policy.	<ul style="list-style-type: none"> Noted. The minimum flood planning levels was determined in accordance with Section 5 of the City's Interim Floodplain Management Policy. Section 5 of the Floodplain Management Policy notes the flood planning level for business/ industrial to be at or above the 1% AEP (1 in 100-year ARI) flood level. The proposed warehouse's final floor levels are set at RL4.50 which is noted to be 500mm above the 1% AEP, according to the Alexandra Canal Flood Study.
L3	<p>The following is also noted:</p> <ul style="list-style-type: none"> The proposed lift access should be clear of the 1% AEP level, or at 	<ul style="list-style-type: none"> This is noted and above the estimated 1% AEP flood level. We note the request to investigate potential flooding via new proposed access from neighbouring site, 63 Campbell Street. The kerb and gutter within the 63 Campbell

Ref.	Summary of submission	Response
	<p>minimum, the electrical connections/controls place above the flood level.</p> <ul style="list-style-type: none"> Potential flooding from the road access from the neighbouring site at 63 Campbell Road is to be addressed in post development modelling. <p>The recommended measures based on post development flood modelling should not increase flood levels offsite and must not divert overland flow to neighbouring properties.</p>	<p>Road development is located at approximately RL2.70m AHD along the development site's northern boundary, which is 1.8m lower than the proposed warehouse floor level of RL4.50m AHD. Further, the levels at the entrances to the site from 63 Campbell Road do not permit water to enter the proposed development site. The Alexandria Canal Flood study show that the development site will not be affected by the 1% AEP flood event via the road access from the neighbouring site at 63 Campbell Road.</p> <ul style="list-style-type: none"> It is noted that the proposed development does not increase the total percentage of impermeable surfaces on this site and will therefore not increase the total runoff being generated. Additionally, the site is not considered to be impacted by flooding from the Alexandria Canal. The proposed site stormwater drainage system is designed to cater for up to the 1% AEP storm in a combination of both below and above-ground conveyance systems. Hence, we do not consider the proposed development to have an adverse impact to the surrounding developments. Lastly, the existing site directs overland flow into the carpark/circulation area of 63 Campbell Road. We confirm that the proposed development maintains the existing overland flow arrangement.
M	Servicing	
M1	<p>Water Servicing</p> <ul style="list-style-type: none"> Potable water servicing should be available via a 150mm C1CL material watermain (laid in 1956) on Gardeners Road Amplifications, adjustments, and/or minor extensions may be required. 	<ul style="list-style-type: none"> Noted
M2	<p>Wastewater Servicing</p> <ul style="list-style-type: none"> Wastewater servicing should be available via a 225mm C1CL wastewater main (laid in 1959) within the property boundary. Amplifications, adjustments, and/or minor extensions may be required. 	<ul style="list-style-type: none"> Noted

Ref.	Summary of submission	Response
N	Heritage	
N1	The Aboriginal Cultural Heritage Assessment Report has been prepared in reference to the relevant Heritage NSW guidelines as required by the SEARs. Based on the assessment provided, Heritage NSW agrees with the management recommendations outlined in the assessment provided and has no additional comments with respect to the proposed development proceeding. Heritage NSW does not require any further agency consultation in relation to this project.	<ul style="list-style-type: none"> Noted

Table 9: Economic, Environmental and Social Impacts - Response to Submissions

5 Project justification

This section includes an updated justification and evaluation of the project, incorporating any relevant issues raised in submissions and the response to these issues provided in Section 4 of this report.

Given only minor amendments and clarifications have been made as a result of the response to submissions process, the proposal has remained substantially the same. As a result, the proposal is considered consistent with the project justification provided with the original EIS. Notwithstanding, a brief overview of the project justification is provided below.

5.1 Strategic context

The proposal meets the objectives and directions outlined in the relevant strategic policies for the site, locality and broader region.

The proposed warehouse and distribution centre will retain and facilitate high quality, industrial floor space within the City of Sydney LGA. In addition, the proposal effectively responds to the surrounding locality and transport network, improving the public domain and aligning with the objectives of the employment lands.

5.2 Economic justification

The proposed development involves a significant capital investment of \$74 million in construction and associated costs. The proposal will provide approximately 24,412m² of warehouse and office space and will support up to 241 jobs during construction and 448 during operation.

5.3 Social justification

The proposed development is expected to have a low, positive social impact on the local community as a result of the new local employment opportunities during construction and operation.

A Social Impact Assessment (SIA) was provided with the original EIS application and the findings of the SIA remain relevant to the proposal

5.4 Site suitability

The site is deemed suitable for the proposed development, given:

- the site's zoning permits warehouse and distribution uses
- the proposal's consistency with the strategic directions for the locality and region
- the proposal is compatible with surrounding land uses and future development
- the warehouse will be appropriately located within the site and suitably setback from sensitive receivers
- all potential environmental impacts associated with the development can be suitably mitigated within the site

5.5 Ecologically Sustainable Development

The proposal has been assessed under the principles of Ecologically Sustainable Development (ESD):

- **The Precautionary Principle:** The proposed development provides the most appropriate response to the site, which takes into consideration all physical, environmental, social, cultural heritage and economic aspects which are required to be addressed. The proposed ESD initiatives will help to achieve significant reductions in the energy required by the development both in building and operation.
- **Intergenerational Equity:** The proposed development ensures inter-generational equity as demonstrated in the Sustainability Management Plan (SMP) submitted with the original EIS application as well as by the ongoing employment opportunities resulting from the development. The proposed development is predicted to achieve a 20% reduction in greenhouse gas emissions, reduce urban heat island effects and utilise renewable energy generation to ensure future proofing the building for future installation.
- **Conservation of Biological Diversity and Ecological Integrity:** The potential environmental impacts of the Project have been detailed throughout the original EIS application, with mitigation measures and proposed offsets described. The proposed development has also been subject of a biodiversity assessment report, which outlines the limited environmental impacts associated with the development.