

**ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000**

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Urbis Ltd
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14 August 2024

Chris Ritchie
Director Industry Assessments
NSW Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Dear Chris,

ASPECT INDUSTRIAL ESTATE MODIFICATION 6 (SSD-10448 MOD 6) & STAGE 4 DEVELOPMENT (SSD-60513208) - RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION WAREHOUSE 8

This response letter has been prepared by Urbis on behalf of Mirvac Industrial Developments Pty Ltd (Mircac) (**the Applicant**) in response to various requests for additional information (**RFI**) dated 19th July 2024 from the Department of Planning, Housing and Infrastructure (**DPHI**) and the subsequent RFI items forwarded by DPHI on the 2nd of August 2024, in connection with the above modification and SSD Application for Warehouse 8 at the Aspect Industrial Estate (**AIE**).

This letter is accompanied by the following attachments:

- Attachment A - Architectural Drawings Warehouse 8_31.07.2024
- Attachment B - Updated Landscape Plans - Warehouse 8_31.07.2024
- Attachment C - Updated BDAR Waiver - Warehouse 8_07.08.2024
- Attachment D - Updated Civil Infrastructure Report_13.08.2024
- Attachment E - Letter Response ESCP_13.08.2024
- Attachment F - NABERS Agreement to Rate

Table 1 below contains the relevant responses to the matters raised in the RFI request.

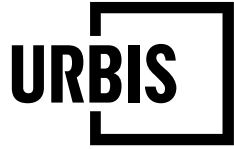
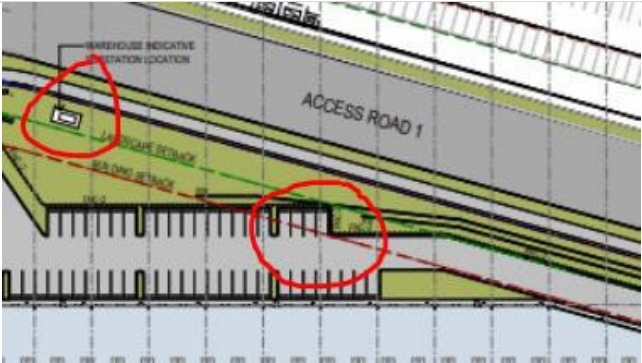
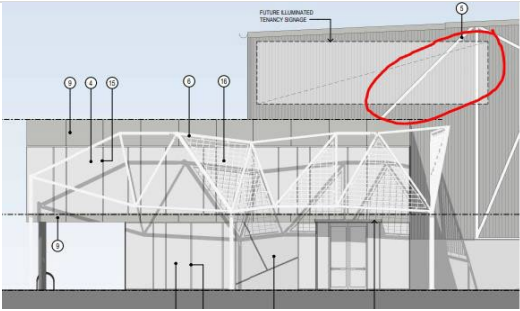
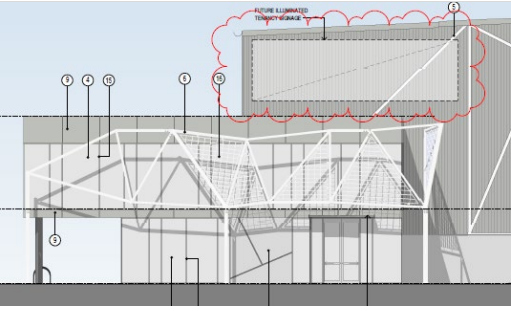
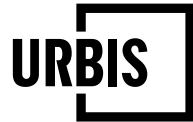


Table 1 Response to RFI

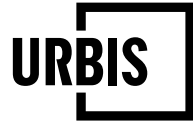
Summary of Issues Raised	Response
Penrith City Council – 24 June 2024	
1. Planning Considerations	
a) There is no objection in principle to the consolidation of warehouses 8A and 8B.	Noted.
b) However, given the proposed amalgamation, there should also be consolidation of the truck entry/exit driveways off Access Road 4. Although it is acknowledged that some additional landscaping is provided near one of the approved truck entry driveways, the consolidation of truck driveways could result in additional front setback landscaping in lieu of the extra vehicle access.	Incorporating two accesses for hardstand areas is a design objective of warehouse developments to provide amenity and comfort for truck circulation. It is proposed to retain the two site access points in line with the estate design objectives and in line with the approved Warehouses 1, 2, 3 and 9.
c) The setback of the fire trail access behind the building setback zone (facing Mamre Road) is an improved outcome.	Noted.
d) The indicative location of the substation fronting Access Road 1 should remain behind the landscaped setback area (see snippet below).	The ultimate location of the substation will be confirmed in a collaborative effort between Mirvac, Edgewater Connections and Endeavour Energy in accordance with the maintenance / operational requirements. The location of the substation fronting Access Road 1 will be supported by a landscape led approach as part of the detailed design phase.

Summary of Issues Raised	Response
	
<p>e) The additional car parking spaces near Access Road 1 appear to be very close to the line of the landscaped setback (see snippet above).</p> <p>f) Given that the proposed modifications would result in 18 additional spaces above the DCP minimum, it is questionable whether the spaces near the landscaped setback are needed. DPFI should ensure that these additional spaces do not impinge of the landscaping in the setback area.</p>	<p>The proposed parking provision seeks to future-proof the warehouse for the potential tenant operations across the large-form warehouse structure. As shown in the snippet above, the carparking remains behind the landscape setback.</p>
<p>g) Any proposed signage on the upper sections of the warehouse facades should not obscure the perforated metal screens used to provide articulation (see snippet below). While signage in the general position as shown is acceptable, the sign should be better incorporated and subservient to the decorative metal screen pattern.</p>	<p>Refer to Attachment A - Architectural Drawings Warehouse 8_31.07.2024. An updated elevational drawing has been prepared to better integrate the proposed signage on the warehouse façade. The signage area on the east facade has been pulled away from the vertical features to the right of the sign. An extract is provided below of the updated signage layout.</p>

Summary of Issues Raised	Response
	
<p>2. Development Engineering Considerations</p> <p><u>Stormwater and Flooding</u></p>	
<p>i. The detailed design of the stormwater drainage system shall demonstrate compliance with Penrith City Council's 'Stormwater Drainage Specification for Building Developments' and shall include detail design drawings of the stormwater pipes, pits, GPTs, rainwater tanks, and the like.</p>	<p>Noted.</p>
<p>ii. The stormwater runoff from Lot 8 is proposed to be discharged to estate basin through approved stormwater network which is consistent.</p>	<p>Noted.</p>
<p>iii. On-lot gross pollutant traps (GPTs) have been proposed which will be maintained privately by owner/s. Detailed design shall include maintenance details including maintenance access to GPTs.</p>	<p>Noted.</p>
<p>iv. Civil Infrastructure Design report by AT&L indicates that the warehouse 8 will have 500mm freeboard from 1% AEP peak flood level, which is acceptable.</p>	<p>Noted.</p>
<p>v. It must be noted that DPIE has approved SSD 10448 MOD 4 to include Elizabeth Enterprise Precinct (EEP) to achieve compliance with the</p>	<p>Noted.</p>

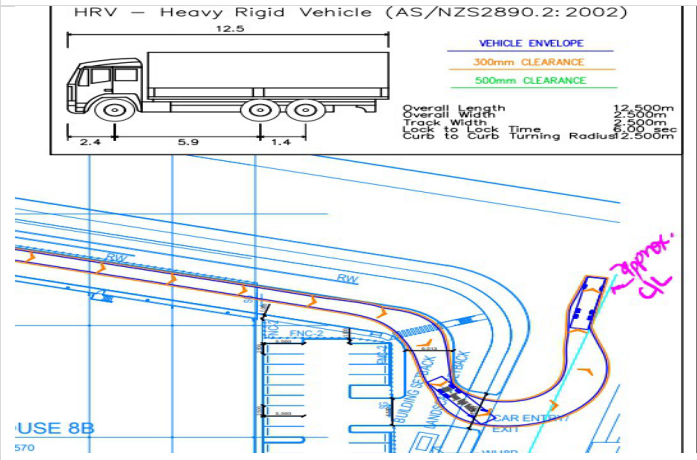


Summary of Issues Raised	Response
<p>Integrated Water Cycle Management (IWCM) controls in the MRP DCP in accordance with the Technical Guidance for achieving Wianamatta South Creek Stormwater Management Targets.</p>	
<p><u>Earthworks & Retaining Walls</u></p>	
<p>i. Additional earthworks are proposed with retaining walls along the northern boundary of Lot 8 to retain additional fill and accommodate proposed driveway/carpark. No engineering issues are raised.</p>	<p>Noted.</p>
<p>ii. Submission Report by Urbis indicates additional surplus fill material needs to be imported. Quality of imported fill shall meet the consent condition.</p>	<p>Noted.</p>
<p>iii. The retaining wall/s including proposed landscape sandstone walls shall be at minimum 2m offset from public land/road reserve in accordance with Mamre Road DCP and shall be reflected on the plans.</p>	<p>Noted.</p>
<p><u>Traffic</u></p>	
<p>i. The vehicular accesses and carparking must be in accordance with relevant Australian Standards AS 2890 and Penrith City Council's 'Engineering Construction Specifications for Civil Works'.</p>	<p>Noted.</p>
<p>ii. Transport statement by Ason Group has been submitted which includes swept paths for various types of vehicles proposed to use the site. Based on this report following comments are provided:</p>	<p>See responses below.</p>
<ul style="list-style-type: none"> • A condition should be considered to include provision for on- site A-Double/B-Double and 20m AVs U-turn manoeuvre on any future Tenant Management Plan as indicated on Traffic Statement by Ason Group. To 	<p>Noted.</p>



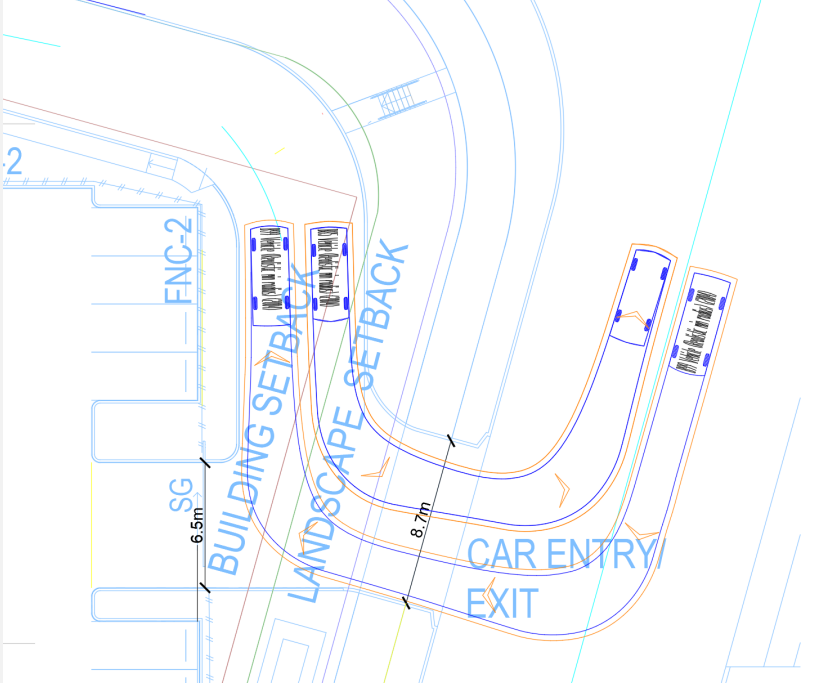
Summary of Issues Raised	Response
<p>enable on-site turning for these large heavy vehicles, some restrictions on the occupation of 2-3 RSDs are required as per the traffic statement.</p>	
<p>• As a single tenement is proposed, two truck entry/exit is less likely to be needed. The truck access points can be reduced to one truck entry/exit or have two truck accesses with one- way entry and exit only for trucks. This is likely to assist with on- site turning and movements of larger heavy vehicles.</p>	<p>Incorporating two accesses for hardstand areas is a design objective of warehouse developments to provide amenity and comfort for truck circulation.</p> <p>The proposed accesses align with the 'staggered' floorplate of Warehouse 8 and enable vehicles in the eastern hardstand area to enter and exit the site independently of the western hardstand area. Having the respective accesses as two-way operations reduces the number of conflicting movements over a one-way circulation arrangement (in this particular context) and is therefore supported.</p> <p>It is proposed to retain the two site access points in line with the estate design objectives and in line with the approved Warehouses 1, 2, 3 and 9. This proposed access design will satisfy the amenity and comfort requirements for truck circulation and further enhance the efficiency of the staggered floorplate for WH8.</p>
<p>One of the swept paths indicate heavy rigid vehicles (HRVs) encroach the centreline of Road 4 while exiting Lot 8 using the carpark access which is not acceptable. Subject to satisfactory swept path diagrams, this vehicular access may only be suitable for B85, B99 and SRVs.</p>	<p>The HRV swept path was undertaken as a checking vehicle exercise to account for emergency vehicles (e.g. fire appliances) circulating the perimeter of the warehouse building under occasional conditions. The car park access has been appropriately sized for day-to-day use by light vehicles (see below response), which in turn discourages trucks from entering the car park.</p> <p>The swept path analysis of the HRV demonstrates that sufficient geometry is provided to accommodate emergency vehicles and it is</p>

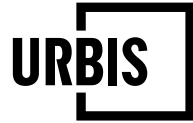
Summary of Issues Raised



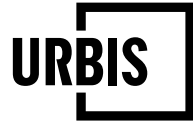
Response

acceptable for fire appliances to cross the centre of the access road also noting that this will be an unmarked carriageway.

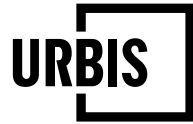
Summary of Issues Raised	Response
<ul style="list-style-type: none"> The carpark access shall enable two simultaneous vehicles passing. A swept path shall be required to demonstrate that the carpark access (crossover/layback) can accommodate minimum B85 vehicle with B99 vehicle passing at once. 	<p>The proposed car park access has a width of 8.7m which is superior to the minimum 6.0m required under AS2890.1 (2004) for a Category 2 access (note: this is to accommodate occasional emergency vehicles as described above).</p> <p>The swept path analysis below validates simultaneous flow is achieved for the B85 vehicle and B99 vehicle.</p>  <p>The diagram illustrates a car entry/exit area with a width of 8.7m. It shows a building setback of 6.5m and a landscape setback. The area is labeled 'CAR ENTRY EXIT' and 'FNC-2'. The diagram also shows a 'BUILDING SETBACK' and a 'LANDSCAPE SETBACK'.</p>



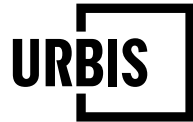
Summary of Issues Raised	Response
3. Traffic Engineering Considerations	
<p>Council's Traffic Team has reviewed the proposal and raises no objection in principle to the modification, subject to the below comments:</p> <p>a) The signalised intersection of Mamre Road and Access Road 1 is to be constructed and operational prior to decommissioning the temporary construction access (although it is acknowledged that the outcome of MOD-7 will affect the timing of the decommissioning).</p> <p>b) The 30m A-double (i.e. 30m Performance Based Standards (PBS) Level 2 Type B Vehicle) to be used for site access and circulation, and 20m Articulated vehicles are to be used for loading docks.</p> <p>c) The proposed use of 30m PBS Level 2 Type B vehicles on local roads will require approval from the National Heavy Vehicle Regulator and Council's Asset Management Team.</p> <p>d) Two (2) electric vehicle charging parking bays are to be provided.</p> <p>e) Loading Dock Management Plan detailing types, scheduling and activities of heavy vehicle associated with the Warehouse 8 operation to be provided prior to obtaining the Occupation Certificate.</p> <p>f) All access points are to be designed in accordance with the requirements of the MRP DCP, AS 2890.1:2004 and AS 2890.2:2018.</p> <p>g) At least four (4) accessible parking spaces and 42 bicycle parking spaces are to be provided to comply with the MRP DCP.</p> <p>h) The applicant must ensure that the submitted Green Travel Plan is implemented.</p>	<p>Noted</p>



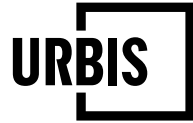
Summary of Issues Raised	Response
<p>4. Environmental Health Considerations</p> <p>Council’s Environmental Health Team has reviewed the proposal and has raised the following considerations:</p>	
<p>a) Biodiversity Considerations:</p> <p>Council’s Biodiversity Officer raises no concerns as the development will not result in additional biodiversity impacts beyond the impacts to biodiversity values that will occur because of the approved SSD.</p>	<p>Noted</p>
<p>b) Environmental Management Considerations:</p> <p>Council’s Environmental Management Officer has reviewed the proposal and raises no concerns noting that a precinct wide approach to noise management within the Mamre Road Precinct will be the responsibility of DPHI.</p>	<p>Noted</p>
<p>c) Waterways Considerations:</p> <p>Council’s Waterways Officer has reviewed the proposal and raises no concerns as the approach to stormwater management was approved as part of the Mod 4 application and because Interim arrangements are proposed in relation to on-lot treatment and provision of rainwater tanks.</p> <p>Specifically, a Stormwater Management Strategy for the proposal has been submitted. It is noted that the MOD 4 application was approved and has allowed the Mirvac owned EEP lands to be incorporated into the extent of the AIE consent and stormwater strategy.</p> <p>The proposed stormwater treatment for the site will include on-lot GPT’s and rainwater tanks to provide water for non- potable demands. The supporting information submitted indicates that more details will be provided prior to issuing a Construction Certificate. The Certifier should ensure that they are</p>	<p>Noted.</p>



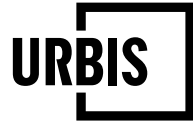
Summary of Issues Raised	Response
<p>designed and sized appropriately and that the rainwater tanks are sized to meet a minimum of 80% of the non-potable demands.</p>	
<p>5. Landscape Considerations</p> <p>Council’s Landscape Architect Lead has reviewed the proposal and has raised the following considerations:</p>	
<p>a) The proposal, specifically Warehouse 8, is inconsistent with Council’s strategic vision for the road corridor. Understorey planting mixes are deficient in mid-storey species and quantities.</p>	<p>Updated landscape plans are provided at Attachment B - Updated Landscape Plans - Warehouse 8_31.07.2024. The species proposed under the ‘Mamre Road Frontage Matrix’ is a continuation of species and densities approved and being delivered on adjacent site to the South East.</p>
<p>b) The Mamre Rd setback shall be planted informally with the following mix of tree species, delivering consistency along the corridor, biodiversity and maximum canopy coverage:</p> <ul style="list-style-type: none"> i. Eucalyptus tereticornis, Forest Red Gum ii. Eucalyptus moluccana, Grey Box Gum iii. Eucalyptus crebra, Narrow-Leaved Ironbark iv. Corymbia maculata, Spotted Gum v. Waterhousia floribunda, Weeping Lilly Pilly vi. Tristaniopsis laurina ‘Luscious,’ Water Gum vii. Cupaniopsis anacardioides, Tuckeroo viii. Melaleuca decora, White Feather Honey Myrtle. 	<p>The updated landscape plans maintains the planting associated with Mamre Road Frontage Matrix. The species associated with the ‘Understorey Planting Matrix’ are supplemented or substituted.</p> <ul style="list-style-type: none"> i. Eucalyptus tereticornis, Forest Red Gum – reflected in the updated landscape plan. ii. Eucalyptus moluccana, Grey Box Gum – incorporated into updated landscape plan iii. Eucalyptus crebra, Narrow-Leaved Ironbark – incorporated into updated landscape plan iv. Corymbia maculata, Spotted Gum Gum – reflected in the updated landscape plan. v. Waterhousia floribunda, Weeping Lilly Pilly Waterhousia – not used with consideration of appropriateness to soil and climate



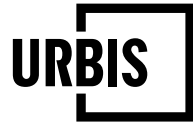
Summary of Issues Raised	Response
	<p>vi. <i>Tristania laurina</i> ‘Luscious,’ Water Gum – Not used as this species is consistent with species listed in Mamre Rd and Aerotropolis DCPs</p> <p>vii. <i>Cupaniopsis anacardioides</i>, Tuckeroo – Not used as this species is not consistent with species listed in Mamre Rd and Aerotropolis DCPs</p> <p>viii. <i>Melaleuca decora</i>, White Feather Honey Myrtle – incorporated into updated landscape plan</p>
<p>c) Understorey plantings shall be sufficient to provide full height and dense screening to built forms on the development site, including large and medium native shrubs as required. The screening effect should continue through the riparian corridor planting and along the edge of northern pavements at Warehouse 1, ameliorating the visual impact of built form from Mamre Rd.</p>	<p>Refer response 5a.</p> <p>The area to the north of warehouse 1 is not included in the scope of this SSDA.</p>
<p>d) There is a lack of screening and canopy species diversity along the access Rd 1 setback. Include <i>Melaleucas</i> and other similar trees for diversity.</p>	<p>‘Understorey Matrix’ amended to include larger shrubs,</p> <p>The Access Road 1 species and arrangement is proposed to be maintained for estate wide consistency as approved and delivered in previous stages.</p>
<p>e) South-eastern boundary is to provide a more diverse species mix, consider <i>Casuarinas</i>.</p>	<p>Refer to the updated landscape plans are provided at Attachment B - Updated Landscape Plans - Warehouse 8_31.07.2024.</p>
<p>f) Street trees do not seem to be provided but should be, in line with Council's Street Tree Masterplan.</p>	<p>Street trees not included in scope of this SSDA. The street trees are previously approved under SSD-10448.</p>



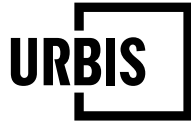
Summary of Issues Raised	Response
<p>g) The landscape plans do not demonstrate changes in level with cross sections. From the civil plans the walls are significant along Mamre Rd and Access Road 1, up to 2m tall. Walls should be designed for reduced visual impact and planting shall screen walls, these plants shall be larger pot sizes. Tall shrubs and climbers are appropriate, proposed groundcovers and small shrubs are inappropriate.</p>	<p>Refer to the section drawings provided in the updated landscape plans at Attachment B - Updated Landscape Plans - Warehouse 8_31.07.2024.</p>
<p>h) Carpark trees are required in engineered tree pits such as Stratavault and connected to the stormwater network</p>	<p>The proposal does not include trees with Stratavault. This is consistent with the other lots across AIE where development proposals have already been delivered.</p>
<p>i) Front Setbacks are to include large trees, not small to medium. Mid-storey screening shrubs are required in setbacks to screen fencing and ameliorate bulk and scale of built form as seen from the public domain</p>	<p>The 'Understory matrix' has been amended to provide consistency with previously approved and developed stages across the AIE.</p> <p>Small-Medium canopy trees are proposed to Access Road 1 as they provide will provide the maximum, vegetated screening with consideration of the structural constraints of the retaining walls. These retaining walls provide facilitate the approved level changes and provide optimised site level outcomes.</p> <p>Fences have been located along edge of carpark to achieve maximum screening on frontage.</p>
<p>j) Estate Roads require continuous canopy and trees planted in turf only. Species should be as per Council's draft Street Tree Masterplan</p>	<p>Estate works are not included in scope of this SSDA. The estate road canopies are previously approved under SSD-10448.</p>
<p>Fire and Rescue NSW – 14 June 2024</p>	
<p>Fire and Rescue NSW (FRNSW) acknowledge correspondence received on the 7 June 2024, requesting advice on the RTS for Aspect Industrial Estate</p>	<p>Noted.</p>



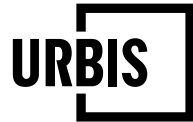
Summary of Issues Raised	Response
<p>Stage 4 Development (Warehouse 8) (SSD-60513208). FRNSW have reviewed the RTS with the particular focus to Department Comments.</p> <p>It is deemed that the amendment has limited scope and application regarding additional hazards or special problems of firefighting. FRNSW submit no additional comments or recommendations for consideration, nor any requirements beyond that specified by applicable legislation at this stage.</p>	
Sydney Water – 27 June 2024	
<p>Sydney Water acknowledges the Applicant’s responses to comments raised during the exhibition of SSD-60513208 and SSD-10448-Mod-6.</p> <p>Sydney Water is satisfied that the proposed Warehouse 8 will not materially impact the Mamre Road Present Stormwater Scheme Plan.</p>	Noted.
<u>Attachment 1 – Recommended Development Conditions</u>	
<p><u>Prior to the issue of an Occupation/Subdivision Certificate:</u></p> <p>Section 73 Compliance Certificate</p> <p>A compliance certificate must be obtained from Sydney Water, under Section 73 of the Sydney Water Act 1994. Our assessment will determine the availability of water and wastewater services, which may require extensions, adjustments, or connections to our mains. Make an early application for the certificate, as there may be assets to be built and this can</p>	Noted.



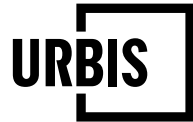
Summary of Issues Raised	Response
<p>take some time. A Section 73 Compliance Certificate must be obtained before an Occupation or Subdivision Certificate will be issued.</p> <p>Applications can be made either directly to Sydney Water or through a Sydney Water accredited Water Servicing Coordinator.</p> <p>Go to the Sydney Water website or call 1300 082 746 to learn more about applying through an authorised WSC or Sydney Water.</p>	
<p><u>Prior to the issue of a Construction Certificate/Complying Development Certificate:</u></p> <p>Building Plan Approval (including Tree Planting Guidelines)</p> <p>The plans must be approved by Sydney Water prior to demolition, excavation or construction works commencing. This allows Sydney Water to determine if sewer, water or stormwater mains or easements will be affected by any part of your development. Any amendments to plans will require re-approval. Please go to Sydney Water Tap in@ to apply.</p> <p>Sydney Water recommends developers apply for a Building Plan Approval early as to reduce unnecessary delays to further referrals or development timescales.</p> <p>Tree Planting</p> <p>Certain tree species placed in proximity to Sydney Water’s underground assets have the potential to inflict damage through invasive root penetration and soil destabilisation. Section 46 of the Sydney Water Act specifies what</p>	<p>Noted.</p>



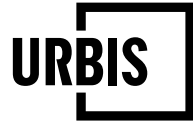
Summary of Issues Raised	Response
<p>might occur when there is interference or damage to our assets caused by trees.</p> <p>For any trees proposed or planted that may cause destruction of, damage to or interference with our work and are in breach of the Sydney Water Act 1994, Sydney Water may issue an order to remove that tree or directly remove it and seek recovery for all loss and associated compensation for the removal.</p> <p>For guidance on types of trees that can cause damage or interference with our assets see Sydney Water webpage Wastewater blockages. For guidance on how to plant trees near our assets, see Diagram 5 – Planting Trees within Sydney Water’s Technical guidelines – Building over and adjacent to pipe assets.</p>	
<p>Transport for NSW – 26 June 2024</p>	
<p>As such, TfNSW has reviewed the submitted documentation and would provide concurrence under clause 2.35 of the State Environmental Planning Policy (Industry and Employment) 2021, subject to the Department’s approval and the inclusion of the following requirements in any Development Consent issued:</p> <p><u>Interim Access Arrangements</u></p> <p>1. Within six months after the issuing of the Occupation Certificate for Warehouse 9 and prior to the release the Occupation Certificate for Warehouse 3, the Applicant shall complete construction of Mamre Road/Access Road 1 intersection including the installation of the traffic signals to the satisfaction of TfNSW including the removal of the temporary construction access.</p>	<p>Noted</p>



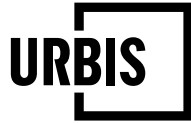
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<p>2. Prior to the Mamre Road/Access Road 1 intersection being completed and operational, the Applicant must ensure only operational vehicle traffic associated with Warehouse 1 and Warehouse 9, and construction vehicle traffic associated with Warehouse 2 and Warehouse 3 is to use the temporary left-in/left-out construction access on Mamre Road.</p> <p>3. Installation of a 60km/h road works speed limit between Bakers Lane and Abbots Road that will remain in operation 24 hours a day and seven days a week for duration of construction unless instructed otherwise by TfNSW.</p> <p>4. A site monitoring plan be included to monitor the volume of construction traffic and operational traffic accessing the site during the period that the temporary construction access is being used.</p> <p><u>Construction Pedestrian and Traffic Management</u></p> <p>1. Prior to the issue of any construction certificate or any preparatory, demolition or excavation works for Warehouse 2, whichever is the earlier, the applicant shall prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with TfNSW.</p>	
<p>Department of Climate Change, Energy, the Environment and Water / Biodiversity, Conservation and Science Group (BCS) – 11 July 2024</p>	
<p>BCS has reviewed the Submissions Report and relevant supporting information and provides the following comments:</p>	
<p>SSD-10448 Modification 6</p> <p>Section 7.17 of the BC Act requires a Biodiversity Development Assessment Report (BDAR) to be submitted with an application to modify a State Significant Development application, unless the authority or person determining the application for modification is satisfied that the modification will not increase the impact on biodiversity values. Any proposed changes</p>	<p>A new BDAR waiver application in support of the amended proposal, attached at Attachment C - Updated BDAR Waiver - Warehouse 8_07.08.2024.</p>



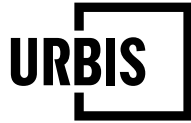
Summary of Issues Raised	Response
<p>that will result in direct, indirect, or prescribed impacts on biodiversity values not assessed under the original approval, are considered to constitute an increase in impacts.</p> <p>BCS recommends that the Submissions Report be updated to address Section 7.17 of the BC Act.</p> <p>SSD-60513208 Stage 4 warehouse 8</p> <p>BCS issued its BDAR waiver determination for this application on 16 April 2024. The BDAR determination states If the proposed development changes so that it is no longer consistent with this description, a further waiver request is required.</p> <p>Given the proposed amendments to the development, it appears that the proposed development is so longer consistent with the description in the BCS BDAR waiver determination. A new BDAR waiver application will therefore need to be submitted prior to the determination of the application.</p>	
<p>Flood Risk Management</p> <p>BCS has reviewed the Submissions Report and the Flood Impact Assessment Aspect Industrial Estate (AIE) MOD 6 - Warehouse 8 prepared by Stantec dated 5 April 2024 (FIA 2024).</p> <p>BCS notes that the FIA 2024 has been prepared to address the amendments to the exhibited SSD-10448 (Modification 6) and SSD-60513208 Warehouse 8 as detailed in Section 2.2 of the Submissions Report. However, the maps in the FIA 2024 are dated 7 September 2023.</p> <p>Currently, applications for Aspect Industrial Estate Stage 3 warehouse 2 and for Modification 6 and Stage 4 warehouse 8 and are being progressed individually. BCS notes that the FIA 2024 (prepared for Modification 6 and</p>	<p>The analysis conducted as part of the FIA 2024 included both the masterplan and roughness layer, encompassing all warehouses collectively. The FIA 2024 did not assess individual warehouses in isolation but evaluated the cumulative impact of all warehouses. This comprehensive approach was compared against existing conditions to ensure thorough evaluation and compliance.</p> <p>While the incremental impact of WH8 Mod6 in comparison to WH2 is negligible, the difference plots are not of the incremental impact but rather are of the differences compared to benchmark conditions prior to implementation of the masterplan.</p>



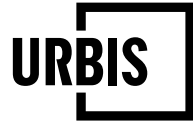
Summary of Issues Raised	Response
<p>warehouse 8) sections 2, 3, and 4 on hydrology, hydraulic and flood impacts are identical to comparable sections in the Flood Impact Assessment Aspect Industrial Estate Lot 2 SSDA prepared by Stantec dated 21 July 2023 (FIA 2023) (prepared for warehouse 2). Also, the maps provided in both FIA versions are identical.</p> <p>BCS seeks clarification on the Master Plan condition about the two dot points below:</p> <ul style="list-style-type: none"> ▪ Whether the Master Plan condition in FIA 2024 includes the Master Plan of FIA 2023 (i.e., includes warehouse 2). <p>If this is the case, and the flood maps are identical in both FIAs, this demonstrates that Modification 6 and warehouse 8 has no impacts on flooding. Accordingly, the discussion on the flood impacts in Section 4 of FIA 2024 and FIA 2023 should not be identical (as currently presented) and must be different to reflect 'nil impact'.</p> <ul style="list-style-type: none"> ▪ Whether the Master Plan condition in FIA 2024 does not include the Master Plan of FIA 2023 (i.e., does not include warehouse 2). <p>If this is the case, and both FIAs have adopted the benchmark conditions as described in the Flood Risk Assessment Aspect Industrial Estate prepared by Cardno now Stantec dated 27 July 2022, this demonstrates that, Modification 6 and warehouse 8 impacts on flooding is by chance equal to the impacts of warehouse 2 on flooding.</p> <p>Accordingly, the cumulative impacts of Stage 3 warehouse 2 combined with Stage 4 Modification 6 and warehouse 8 would be significant and must be addressed.</p> <p>BCS requests clarification on the above two dot points.</p>	<p>In line with industry standards for flood impact assessments, the FIA 2024 accurately reflects the overall impact and does not indicate a nil impact to Benchmark Conditions. Therefore, no further adjustments to the report are required.</p>



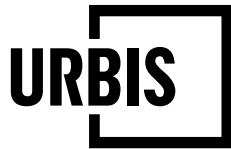
Summary of Issues Raised	Response
<u>Waterway Health and stormwater management</u>	
<p>Water and stormwater management</p> <p>The Civil Infrastructure Report needs to be updated to ensure the catchments and stormwater treatment systems are consistent across figures, tables and the MUSIC model.</p> <p>As the proposal is close to non-compliance on the flow targets, BCS recommends that the Civil Infrastructure Report and MUSIC model be updated and resubmitted for review prior to determination of the Modification 6 and SSD-60513208 Stage 4 warehouse 8 applications.</p> <p><u>Information required prior to determination</u></p> <p>Prior to determination of both applications, update the Civil Infrastructure Report as per below:</p> <ul style="list-style-type: none">▪ Numerous inconsistencies in the catchment areas exist between the following which need to be fixed:<ul style="list-style-type: none">– Post development catchment plan 18-596-SKC197D– Catchment and WSUD Elements Table– MUSIC model MUS007D-02-18-596-MOD4 Stage 4.sqz.▪ Inconsistencies between the tank volumes in report table and the MUSIC modelling need to be fixed.▪ Inconsistencies between the Bioretention Surface Area in MUSIC and report table with an explanation provided.	<p>An updated Civil Infrastructure report, MUSIC model and Flow Duration Curve has been prepared to ensure consistency and the inconsistencies identified by BCS are rectified. Refer to Attachment D - Updated Civil Infrastructure Report_13.08.2024.</p>



Summary of Issues Raised	Response
<p>Erosion and sediment control</p> <p>BCS provides the following comments regarding the two separate documents that include details on erosion and sediment control (ESC) for warehouse 8:</p> <ul style="list-style-type: none"> ▪ Civil Infrastructure Report plans - the ESC plans are only relevant once all works are essentially complete (apart from final stabilisation of landscaped areas) and therefore are not relevant for most of the construction phase. ▪ ESCP (ErSed) - the basins seem to be 50% under-sized (see below markup with comments on the calculations) and the purpose and information on Sheet 2 is unclear. 	<p>Responses are provided in a letter response prepared by ErSED (Attachment E - Letter Response ESCP_13.08.2024) and are reproduced below.</p> <ul style="list-style-type: none"> ▪ The civil infrastructure plans have been prepared over the final building stage of the development and do not form part of the Progressive Erosion and Sediment Control Plans (PESCPs) prepared by ErSed. <p>The initial PESCP presented provides for the commencement of the project when the maximum exposed surface exists. As site and catchment conditions evolve during construction, requiring changes to the ESC strategy, revised Progressive ESCP will be issued for implementation.</p> <p>These Progressive ESCP will be prepared to maintain consistency with the Technical guidance for achieving Wianamatta- South Creek stormwater management targets (DPE, 2022).</p> <ul style="list-style-type: none"> ▪ Refer to the updated ESCP Plans at Attachment E - Letter Response ESCP_13.08.2024. <p>See new sizing and response to BCS item 3</p> <p>See note within original sheet 1001 directing to sheet 1002 indicating modelled location and footprint of the proposed basin.</p> <p>Sheet 1002 has been removed as this modelled location and footprint is no longer current given resizing of basin. The location of the basin remains unchanged. The form of the basin will be modelled and confirmed prior to construction</p>



Summary of Issues Raised	Response
<p><u>Information required prior to determination</u></p> <p>Updated ESCP that meets the construction phase targets in accordance with sections 2.4 and 4.4.2 of the Mamre Road Precinct Development Control Plan consistent with the Technical guidance for achieving Wianamatta–South Creek stormwater management targets (DPE, 2022).</p>	<p>Sheet 0002 provides details on HES basin construction from IECA 2018 and reformatted within Turbid.com.au.</p> <ul style="list-style-type: none"> ▪ Refer to the updated ESCP Plans at Attachment E - Letter Response ESCP_13.08.2024. <p>The tables within sheet 0001 have been updated</p> <ul style="list-style-type: none"> – Design procedure for type D basins Updated to reflect details using option 2B (per IECA Appendix B 2018) – Type B basin calculation see notes to design procedure this sheet <p>Updated to reflect details from design procedure option 2B</p> <p>This is in accordance Table 2 of the DPE technical guidance and further explained within the erosion and sediment control design principals.</p>
DPHI – 2 August 2024 (via email)	
<p>As discussed, please update the RTS to include a response to the BCS letter and include the NABERS agreement to rate.</p>	<p>The response to the BCS is letter is provided above.</p> <p>The signed NABERS agreement to rate is attached at Attachment F - NABERS Agreement to Rate.</p>



We trust that the above information appropriately addresses the matters raised by the Department.

If you wish to discuss the above further, please feel to contact me as per my details below or a member of the Mirvac Project Team.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Nik Wheeler", written over a light grey rectangular background.

Nik Wheeler
Associate Director
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