



Response to Submissions



For:
Proposed IKEA Multi-Function Logistics Unit and
associated Estate Civil and Infrastructure Works
SSD_6954

At:
Lot, 1, 3 and 4 in DP1208554, Lot 128, 132 in
DP1194052 and Lot 102 in DP1188147
Sydney Business Park – Marsden Park

November 2015

FIDC



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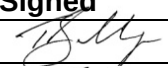
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1.0 Introduction

This Response to Submissions Report has been prepared on behalf of IKEA Distribution Services Australia Pty Ltd as proponent of State Significant Development Application SSD_6954. The application was lodged in March 2015 and involves the construction of a new Multi-Function Logistics Unit (MFLU) and associated estate infrastructure. The proposed MFLU will now be constructed on a newly created Lot 1 in DP1208554 (the 'IKEA site') while the broader estate works will occur on Lot 3 and 4 in DP1208554, Lot 128 and 132 in DP1194052 and Lot 102 in DP1188147 located within the Sydney Business Park at Marsden Park. IKEA has engaged FDC Construction and Fitout Pty Ltd (FDC) to prepare this report. Sydney Business Park has also assisted with the provision of information for proposed estate works that form part of the proposal.

The proposed development will provide warehouse and distribution functions for IKEA to service their growing retail network throughout Australia. The proposal includes the construction of close to 70,000m² of warehouse floor space (including standard warehousing and high-bay automated racking) and ancillary office, hardstands, car parking and landscaping. No retailing will occur from the proposed facility. The proposal also includes the construction of an estate road, drainage infrastructure and services which will be undertaken by the Sydney Business Park to service IKEA and other future development sites.

The application was placed on public exhibition from the 5th of August 2015 until the 7th of September 2015. A total of eight submissions were received from various government agencies including:

- Blacktown City Council;
- Roads and Maritime Services;
- Transport for NSW;
- Department of Primary Industries;
- Environment Protection Authority;
- Sydney Water;
- Office of Environment and Heritage; and
- Transgrid.

The Department of Planning and Environment wrote to FDC on the 14th of September 2015 and confirmed that a response to each of the matters raised during exhibition was required. Furthermore, The Department noted that Blacktown City Council had lodged an objection to the proposal and that if the objection was not withdrawn, the Planning and Assessment Commission would become the consent authority. The project team have met with Blacktown Council a number of times throughout the assessment process and are hopeful that Council will withdraw this objection given the significant social and economic benefits of the proposal.

This report responds to each of the matters raised, providing additional information, further justification, revisions to the proposed development or more detailed mitigation measures to satisfy concerns where possible. On the basis of this process, we believe that the proposed development can be supported by the Department of Planning and Environment and approved.

Information provided in support of this report includes:

- Revised Architectural Plans – prepared by Watson Young Architects;
- Revised IKEA Civil Plans;

1.1 Clarification of Works

The following clarification of works is provided to clearly define the relationship between the current proposal (SSD_6954) and related works and approvals occurring within the Sydney Business Park. This expands on information already provided in Section 1.4 and 3 of the Environmental Impact Statement.

Subdivision

Sydney Business Park applied to create a specific lot for the 'IKEA' proposal. This was done to satisfy commercial obligations associated with IKEA's agreement to purchase land from Sydney Business Park. A separate property title is now available to complete this property transaction. This lot (Lot 1 in DP1208554) has now been registered as illustrated below in Figure 1.1:



Figure 1.1: Six Maps Screenshot – Marsden Park (NSW Government)

Bulk Earthworks

Sydney Business Park applied to Blacktown Council to undertake vegetation clearing and bulk earthworks on the IKEA site and along the proposed road corridor of Road 5 under DA15/1088. This application was submitted to Blacktown Council in May 2015 and was approved in August 2015.

The approved bulk earthworks were designed to provide IKEA with a benched pad upon which to construct the proposed MFLU once approved. These works were expedited by Sydney Business Park to mitigate timing risks associated with delivering the IKEA project given the extent of earthworks required to link the site with existing estate services and road infrastructure. The approved extent of vegetation clearing and bulk earthworks is illustrated in Figure 1.2.

Bulk earthworks are well underway with completion anticipated in late November 2015. The site will be completed so that, following favourable resolution of

SSD_6954, construction works on the MFLU and estate infrastructure (Road 5 and Basin B) can commence immediately.

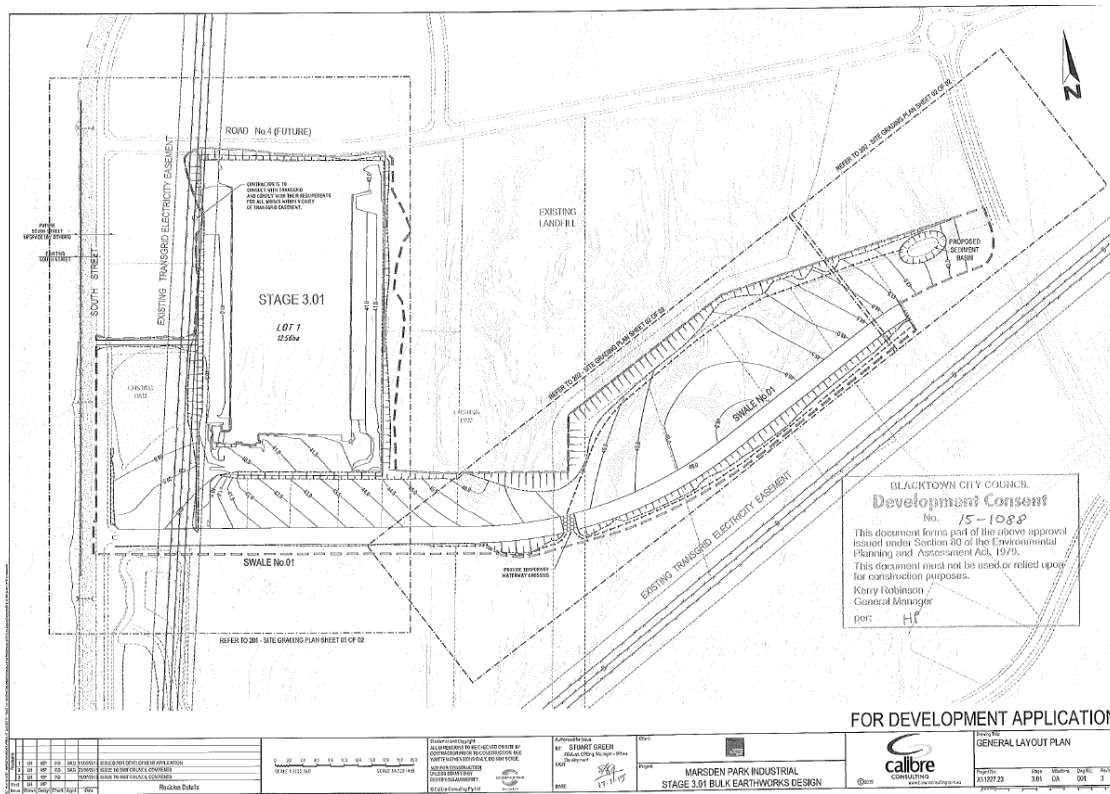


Figure 1.2: Approved Bulk Earthworks - General Layout Plan (DA15/1088)

The Current Proposal (SSD_6954)

The current proposal is comprehensively described within Section 3 of the Environmental Impact Statement prepared by FDC Construction and Fitout Pty Ltd and dated 8 July 2015. Subsequent amendments are described in this report. In summary, the proposal involves construction of the following works:

- The IKEA Multi-Function Logistics Unit (MFLU) including associated car parking, landscaping, on site stormwater management infrastructure and hardstands;
- Construction and dedication of Estate Road No. 5 intersecting at South Street and connecting into an approved collector road within the estate;
- Construction of proposed drainage Basin B (2.04ha) and creation of necessary drainage easements; and
- Construction of services including water, sewer, electricity and communications infrastructure.

IKEA is responsible for constructing the MFLU and associated works within the boundary of Lot 1 in DP1208554. Sydney Business Park is responsible for constructing Road 5, Basin B and services because they relate the broader Sydney Business Park Estate. These estate works, although critical to the operation of the IKEA MFLU will also serve other development sites as the estate grows and continues to attract additional industrial activities.

It was decided early in the process, following consultation with the Department, that the IKEA proposal should incorporate the proposed estate works in one application to ensure that the approval process could be appropriately coordinated.

2.0 DPE Preliminary Assessment

The Department of Planning and Environment has undertaken a preliminary assessment of the proposal and has requested that the following matters be addressed:

Table 2.1: Department of Planning and Environment Issues

Issues	Response
1 Clarification of the details of the proposed development <i>Please provide further details regarding the extent of the project site including:</i> ▪ <i>A detailed plan showing the extent of the full site overlaid against the current land use zonings of the Marsden Park Industrial Precinct; and</i> ▪ <i>Details regarding the utilities to be delivered by SBD under the current application.</i> <i>The civil plans in Appendix 8 of the EIS show a different extent compared to the area shown in Appendix 9. Please confirm these details of the project for assessment.</i>	A detailed site plan has now been provided against the current ILP and zoning map. This plan is provided in Section 2.1 below and Appendix 1. Additional details are now provided for the provision of utilities in Section 3 to supplement information already provided. The extent of works remains consistent except for one image within the Calibre Engineering report. This is now rectified with a revised image within the Calibre Report (Appendix 3).
2 Indicative Layout Plan <i>The EIS states that the variation to the Marsden Park Industrial indicative layout plan (ILP) is being progressed with Council. However, DA15-1088 notes that compliance with the ILP will be addressed under future applications. Please confirm and provide details of any separate DA addressing variations to the ILP and civil works for the site. If the variation to the ILP is being sought under this application, please provide a justification for the departure from the ILP, consistent with the requirements of the Blacktown City Council Growth Centres Development Control Plan.</i>	The proposal involves varying the Indicative Layout Plan and therefore also the zoning map. The position of Road 4 and 5 are being modified to accommodate the proposal, whilst retaining the main functions of each road in providing east-west linkages through the precinct. The road corridors will comply with the visions of the DCP (regarding road design, width, building setbacks and all other amenity standards). Further justification of the proposal is provided below in Section 2.1. In addition to this proposal, Blacktown City Council's strategic planning team have been working with the Department of Planning and Environment to prepare a series of SEPP map adjustments throughout the North West Growth Centre to update existing mapping to reflect various proposals. The proposed changes to the Marsden Park Industrial Indicative Layout Plan are included as one of these modifications. FDC has been advised that Council will be issuing the

Issues	Response
	Department with revised mapping for incorporation into the SEPP within the next few weeks. Any queries in this regard should be directed to Chris Shannon, Manager Strategic and Precinct Planning at Blacktown City Council or Paul Robilliard at the Department of Planning and Environment.
3 Height <i>The contravention of the height control provides justification on economic grounds for the project. In accordance with Part 5, clause 4.6 of State Environmental Planning Policy (Sydney Region Growth Centres) 2006, please provide; justification that the development standard is unreasonable or unnecessary in this case; and sufficient environmental planning grounds to justify the contravention of the maximum height control.</i> <i>Demonstrate that design variations have been considered with respect to the height and bulk of the development.</i>	A revised Clause 4.6 submission is provided below in Section 4.2 to provide further justification of the proposed variation in building height. Design variations considered by the team are included within Section 4.1.
4 Noise <i>Please confirm that the noise data used in the noise assessment was collected from the nearest residential receptor. In this regard the Department notes that the nearest resident receptor identified in the noise assessment is 210 metres from the IKEA site.</i>	During early consultation, Blacktown City Council instructed IKEA to examine possible acoustic impacts of the proposal on the existing 'Active Lifestyles Estate' in Marsden Park. This was communicated to our acoustic consultant who then prepared a methodology that included positioning noise monitoring equipment within this locality. Despite this, Lee Hudson of Wilkinson Murray (previously of Rodney Stevens Acoustics) has been consulted and provided the following response: <i>'Logging at one location was considered to adequately represent all surrounding residential receivers and the caravan park was selected as being centrally located, accessible and sufficiently representative of all nearby residential receivers (it also currently represents the largest residential community closest the site – although that was not the basis for selection).</i> <i>The night-time RBL was 36 dBA which is consistent with that expected at all residential properties in close proximity to the site. This level is also consistent with the background sound level documented in the recently released for comment Draft Industrial Noise Guideline as typically encountered in a</i>

Issues	Response
	suburban residential receiver category (35 dBA night-time). There is no reason to expect the noise environment at the South Street receiver locations to be significantly different from that characterised during the ambient noise survey’. On this basis, the methodology employed during the Acoustic assessment remains robust and outcomes accurate.

5 Bushfire

The EIS refers to a Bushfire Protection Assessment (BPA) being undertaken for the Marsden Park Industrial Precinct. Details of the APZs discussed in the EIS should be provided, including images and a copy of previous bushfire assessments should be provided to support the application.

As outlined within the EIS, Eco Logical Australia Pty Ltd was engaged by SBP to prepare a bushfire protection assessment (BPA) for the proposed works.

This report is now attached within Appendix 4. Figure 2 from the report is provided below to illustrate the IKEA site in relation to the proposed APZ (along South Street).

The proposed development of the IKEA MFLU and associated estate infrastructure will not be affected by the recommendations of the Bushfire Protection Assessment.

Please provide a demonstration that the site layout complies with the established APZs and recommendations of the BPA.



6 Visual

Further justification regarding the visual impact from locations, surrounding the IKEA site should be incorporated into the clause 4.6 variation in section 4.2 of the

A revised Clause 4.6 submission is provided below in Section 4.2 to justify the proposed variation in permissible building height. This submission

Issues	Response
<i>EIS.</i>	examines potential visual impacts as part of justifying the proposed variation in building height.
7 Groundwater <i>Please refer to the DPIs comments contained in their attached submission.</i>	JK Geotechnics were engaged to prepare a preliminary geotechnical investigation of the site. In response to this matter, JK Geotechnics were asked to specifically address the likelihood of impacts to groundwater as a result of bulk earthworks that were assessed and approved by Council under DA15/1088. As indicated in Section 1.1, these works are expected to be completed by the end of November 2015. They provided the following feedback: <i>'In general, the proposed development will require cut and fill earthworks to a maximum depth of about 2m and height of about 4m. For the cut portions of the earthworks, excavation will extend through the soil profile and into the upper weathered bedrock strata. We further understand that all stormwater from the site will be directed to a stormwater detention basin immediately adjacent to the site, on its western side.</i> <i>Given the above, we consider the proposed development will not adversely impact on global groundwater flows. Some localise groundwater seepage from perched water tables may occur during the earthworks, and in the permanent case, minor seepage at the soil/bedrock interface may occur in cut batter slopes. Such seepage will be directed to the stormwater system.'</i>

2.1 Variation to the Indicative Layout Plan

As outlined in Table 2.1, the proposal involves varying the Indicative Layout Plan by altering the position of Road 4 and 5. This is best illustrated by Figure 2.1 below which overlays the proposed site plan with the current Indicative Layout Plan and zoning map.

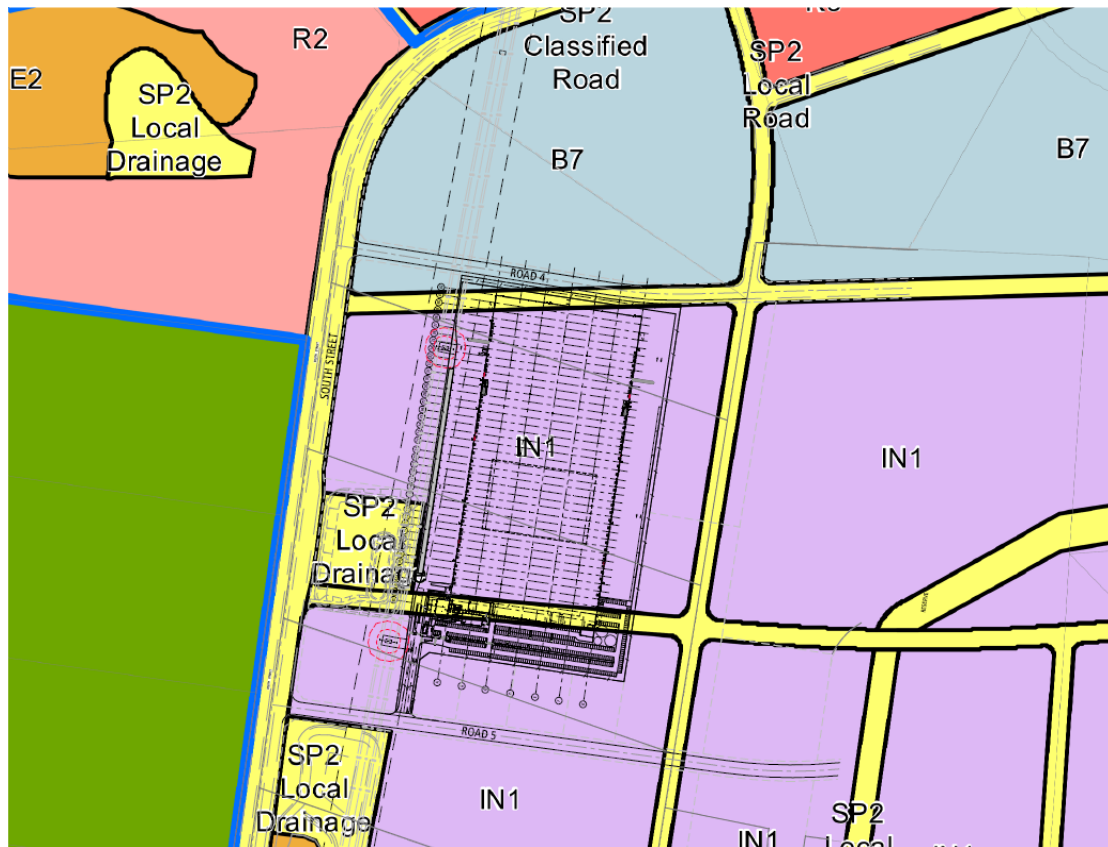


Figure 2.1: Site Plan/ Zoning Overlay

The matter of zoning was discussed at length with the Department prior to the submission of the Environmental Impact Statement. Initially, advice was provided by the Department that a Planning Proposal would need to be submitted to amend SEPP (Sydney Region Growth Centres) 2006, running concurrently with the Development Assessment process. This advice was later changed with confirmation being provided that the proposal need only change the Indicative Layout Plan, a process which would then automatically change the zoning layout. The Environmental Impact Statement was prepared on the basis of this advice. This is further confirmed by the fact that Blacktown Council and DoPE are working to update a series of maps that form part of the SEPP, one of which includes the proposed change.

It is therefore assumed that Blacktown City Council's concerns regarding the prohibition of 'Warehouse and distribution centres' within the SP2 Infrastructure (Local Road) are irrelevant where the proposal involves modifying the Indicative Layout Plan and therefore the position of zoning boundaries.

Variation to the Indicative Layout Plan

The proposal involves repositioning the location of Road 4 and 5 to accommodate the length of the proposed MFLU in a north-south direction. The modification to Road 4 is less significant and involves relocating its future intersection with South Street further north (by approximately 50 metres). The modification to Road 5 is more significant, relocating its proposed intersection with South Street in a southerly direction by around 100 metres. Despite these changes, each road maintains its function by providing east-west linkages through the Marsden Park Industrial Area.

The attached estate civil engineering documentation (prepared by Calibre) illustrates that Road 5, in particular, will continue to comply with the visions of the DCP with regard to road design, reserve width and all other amenity standards as defined by the DCP.

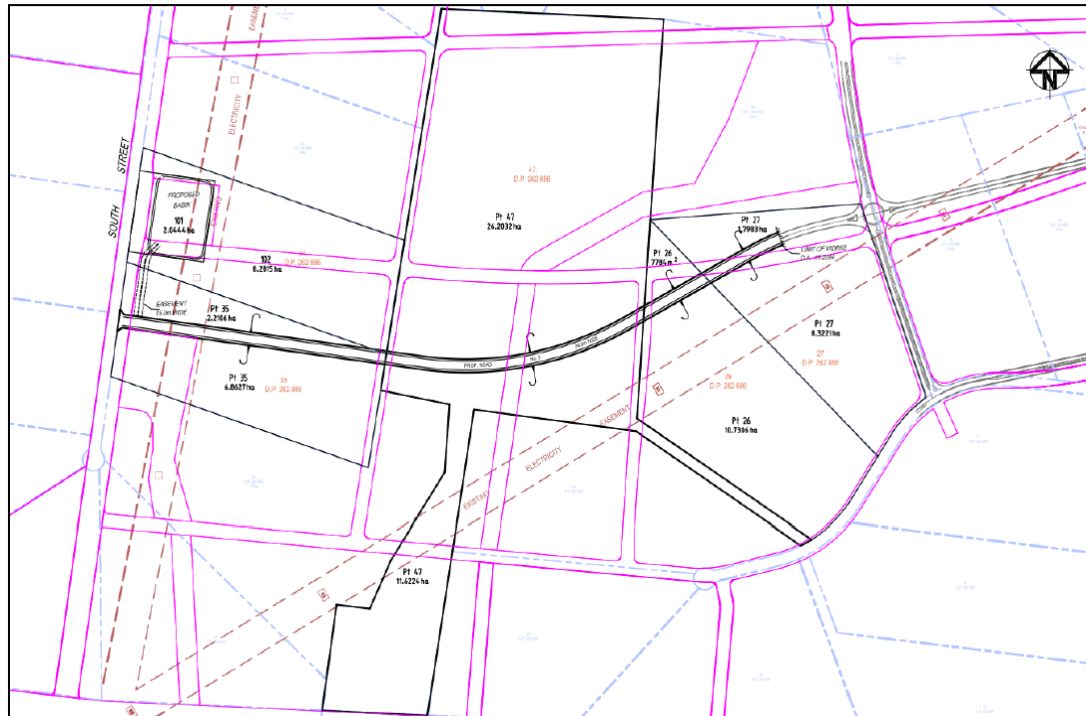


Figure 2.2: Proposed Estate Infrastructure Works overlayed with the current Marsden Park Industrial Indicative Layout Plan - shown in pink (Calibre Consulting 2015)

Growth Centres Development Control Plan

The Growth Centres Development Control Plan allows variations to the Indicative Layout Plan (ILP) where such variation remains consistent with the objectives and controls of the DCP. In particular, Section 2.2 of the DCP requires the consent authority to consider the following matters:

- 1) *All development applications are to be generally in accordance with the Indicative Layout Plan*
- 2) *When assessing development applications, Council will consider the extent to which the proposed development is consistent with the Indicative Layout Plan.*
- 3) *Any proposed variations to the general arrangement of the Indicative Layout Plan must be demonstrated by the applicant, to Council's satisfaction, to be consistent with the Precinct Planning vision in the relevant Precinct Schedule.*

In response to the first two points, the proposal has been designed to generally accord with the Indicative Layout Plan. Given the size of the proposal, the distance between Road 4 and 5 has been expanded, enabling each road to retain its key function in providing an east – west link through the industrial precinct. The proposal does not restrict, or expand, opportunities for future industrial development as is intended within the locality. The proposed variation is minor in nature and will not alter the intent of the original concept.

The Precinct Planning Vision for the Marsden Park Industrial Precinct is described below:

The vision for the Marsden Park Industrial Precinct is to create an attractive employment precinct that provides for a diverse range of job opportunities to support the growing residential areas in Sydney's North West. The precinct will be characterised by a mix of employment generating uses such as general and light industrial, business parks, and commercial uses. It will also consist of some smaller medium and low density residential areas near the future Marsden Park Town Centre to the north.

Industrial land will form the majority of the precinct. It is intended to support a range of light and general industrial uses from large floor-plate warehousing and storage facilities which capitalise on the precinct's location near Richmond Road, to smaller factory unit style developments for more intensive trade based activities. Industrial uses are to operate to best practice industry standards and not impose any adverse impacts on the nearby residential lands. Buildings are to be appropriately designed to address the street and other public domain areas, and all street frontages will contain quality landscaping that establishes a high standard of character and design.

The proposed variation will facilitate the development of the proposed IKEA MFLU and can be supported on the basis of being consistent with the DCP's Precinct Planning Vision for the Marsden Park Industrial Area. The proposal involves large floor-plate warehousing that is appropriately designed to address its street frontages and supplemented with high quality landscape setbacks. The proposed facility will operate in accordance with best practice industry standards and will not impose any adverse impacts on nearby residential. The development will contribute to the creation of an attractive employment precinct and support a significant range and quantum of job opportunities.

3.0 Response to Submissions

A total of eight submissions were received during the exhibition period from various government agencies as listed below:

- Blacktown City Council;
- Roads and Maritime Services;
- Transport for NSW;
- Department of Primary Industries;
- Environment Protection Authority;
- Sydney Water;
- Office of Environment and Heritage; and
- Transgrid.

3.1 Blacktown City Council

During the public exhibition phase, the proponent team met with Blacktown City Council on 3 September 2015 to discuss the project and seek input to various aspects of the proposal. A number of matters were raised by Council, including the need for additional information (where necessary) and a greater level of architectural attention to the facades visible from the public domain. The project team and Council agreed that the best approach to responding to these issues was through the Response to Submissions Report, to be prepared following exhibition.

Subsequent to this meeting, Council made a submission which objected to the proposal. The issues raised by Council involved many of the same issues discussed at the meeting described above. These issues related to various architectural, amenity and engineering matters as listed below in Table 3.1.

The Sydney Business Park continues to work closely with Council on a number of issues across the broader estate. The more specific estate engineering matters have been addressed directly with Council's engineering team and are also addressed below for completeness.

IKEA, Sydney Business Park and FDC then met with Council on 21 October 2015 to more specifically discuss architectural issues and to identify possible solutions to satisfy Council's concerns. This meeting provided an opportunity to explain design constraints associated with the construction of high-bay automated racking (as outlined in Section 4.1), and to present a series of design ideas for discussion and consideration. The details of this meeting are described in Section 4.1.

Council's listed concerns are addressed below:

Table 3.1: Blacktown City Council Objection

Issues	Responses
1 <i>Planning</i> <i>It is noted that DA-15-1088 for bulk earthworks was approved on 28 August 2015, however this DA does not pre-empt the approval of any future DAs on this site such as 'pre-approval' of a variation to the indicative layout plan. Furthermore, DA-15-1088 approved bulk earthworks as per the Extent of Works Plan (prepared by Calibre Consulting, Reference X11227.23-DA_3, Revision 4, dated 10 July 2015). Trees and vegetation outside of the 'extents of works' area are not approved for removal in DA-15-1088.</i>	Noted. DA15/1088 only related to bulk earthworks and did not involve any proposal to vary the indicative layout plan. The extent of works area for DA15/1088 and the current proposal is the same area. Any works or vegetation removal outside of this area would be subject to separate approvals.
2 <i>The EIS states that although this site was assessed for the purpose of bulk earthworks in DA-15-1088, that civil infrastructure works have been incorporated as part of this application. As this is the case, we note that the Department will reassess the proposed works in light of flora, fauna, aboriginal archaeology, contamination, acid sulphate soils, tree removal, etc.</i>	Council's request for the Department to re-assess 'flora, fauna, aboriginal archaeology, contamination, acid sulphate soils, tree removal' is unclear. If Council has granted approval for bulk earthworks to an area, having assessed the above matters, why would these matters need to be re-assessed, particularly given that the extent of works for DA15/1088 is the same for the current proposal? We do not believe that re-assessment of these matters is required, particularly as Sydney Business Park is close to completing bulk earthworks at the time of writing this report (under DA15/1088).
3 <i>As detailed in Council's correspondence dated 3 June 2015, it was identified that a portion of the subject site is zoned SP2 Infrastructure (Local Road) under State Environmental Planning Policy (Sydney Region Growth Centres) 2006. 'Warehouse and distribution centres' are not permissible in the zone. The EIS incorrectly states that the entirety of the site is zoned 'IN1 General Industrial.' We trust that the Department will address this zoning issue accordingly.</i>	The proposal involves varying the Indicative Layout Plan and therefore also the zoning map. The position of Road 4 and 5 are being modified to accommodate the proposal but retain the main functions of each road in providing east-west linkages through the Marsden Park Industrial Area. The road corridors will continue to comply with the visions of the DCP with regard to road design, width, building setbacks and all other amenity standards as outlined in the DCP. Further justification of the proposed modifications is provided in Section 2.1. In addition to this proposal, Blacktown City Council's strategic planning team is working closely with the Department of Planning and Environment to prepare a series of SEPP map adjustments throughout the North West Growth Centre to rectify and change existing mapping to reflect various proposals. The proposed changes to the Marsden Park Industrial Indicative Layout Plan are included as one of these

Issues	Responses
	modifications. FDC has been advised that Council will be issuing the Department with revised mapping for incorporation into the SEPP within the next few weeks. Any queries in this regard should be directed to Chris Shannon, Manager Strategic and Precinct Planning at Blacktown City Council or Paul Robilliard at the Department of Planning and Environment.
4 <i>In relation to the planting in the bio-retention system, Page 47 of the EIS states that “a horticulturalist is to confirm that the selected plants will grow well in the design location and site configuration.” We recognise this and recommend that this is addressed in a condition of consent of any future development consent.</i>	Noted. Please refer to Section 5 for proposed mitigation measures.
5 <i>The proposed landscape plans demonstrate a suitable design of trees and plantings, however concern is raised that the proposed pot sizes are not satisfactory. Therefore, suitably sized trees, shrubs and plantings are required to be demonstrated on the plans which demonstrate that the resulting planting will suitably complement the proposed building and research maturity in a suitable timeframe.</i>	Noted. Revised landscape plans are now included to incorporate larger pot sizes at the main site entry so that more mature planting is visible from commencement of occupation of the project. The remaining perimeter landscape areas will retain smaller pot sizing to achieve greater levels of plant survival during establishment. Smaller planting stock has greater level of success in adapting to existing soil conditions for this scale of development.
6 <i>As raised in Councils’ correspondence dated 3 June 2015, the overall building design was considered to result in a poor presentation, and this concern remains as the proposal in its current is not considered to demonstrate high quality building design. This is particularly the case given the proposal is almost double the permitted building height and provides a poor built form which is considered to contravene the objective of clause 4.3 Height and Buildings as follows:</i> <i>“(d) to establish parameters for and promote a high quality built form.”</i> <i>It is recognised that the central building form is the result of the internal functionality of the high bay storage system sought by the Proponent. However, this internal system does not constrain the exterior presentation of the building, which is capable of providing a high quality built form, as is the expectation of other recently approved warehouse buildings within the Marsden Park Industrial Precinct. To maintain the quality of the new built forms in this precinct, the design of the building is required to be improved so to as to demonstrate design excellence and comprise suitable architectural design measures. The proposal in its current form is not supported.</i>	The proposed automated high bay warehouse represents 17 percent of total floor space proposed and is positioned central to the main building so that the proposed height is difficult to read from most locations on site. The proposed height exceedance should be considered in this context and not for the entire development. The proposed design has been modified to address the comments raised by Council. Please refer to Section 4.1.

Issues	Responses
7 <i>The proposed boundary fencing and retaining walls are to be clearly demonstrated on the plans.</i>	Revised architectural plans are now submitted to clearly illustrate the location of fencing and retaining walls.
8 Traffic <i>We trust that the proposal was also referred to the RMS for their comments.</i>	RMS was consulted and has provided a submission that supports the proposal. Please refer to Section 3.2 below.
9 <i>The proposal is not supported as it does not satisfy the car parking requirements of the BCC Growth Centre Precincts DCP 2010. The application is required to be amended to include “provisional” car parking spaces to provide compliant number of parking spaces. These spaces are recommended to be provided around the perimeter of the building or site. The purpose of this is to demonstrate that should the site be occupied in the future with a higher level of staff/visitors: that parking is capable of being provided within the site. This consideration is applied to all development applications in the Marsden Park Industrial Precinct, to ensure that the future operation of this precinct is capable of absorbing staff/visitor parking demands on site, and therefore that the cumulative parking demands of this Precinct is not dependant on street parking.</i> <i>This is particularly the case for the subject site which is a battle-axe allotment, and therefore does not benefit from street parking directly adjacent to the site boundary.</i> <i>Should there be a shortfall of on-site car parking spaces, it is recommended that a condition of consent is imposed on any development consent which limits the number of staff permitted on site at any one time to the number of on-site car parking spaces.</i>	An architectural plan has now been prepared to illustrate the provision of additional parking on site to satisfy the requirements of Council's DCP. Based on IKEA's investment in this site and operational requirements, the need for additional parking is unlikely. However, the Provisional parking plan clearly indicates that compliance is achievable in the event that additional parking is ever required. A condition limiting staff numbers would contradict the objectives of the SEPP, IN1 Zone and the Growth Centres DCP. Such a condition is unnecessary on the basis that additional parking can be provided on site (if/ when required).
10 S94 Contributions <i>The EIS (Section 4.7) states that “Sydney Business Park anticipates that relevant developer contributions will be applied to this application in accordance with these documents. Sydney Business Park will be responsible for payment of these contributions as part of their agreement to sell the site to IKEA.”</i> <i>If there is an arrangement between Sydney Business Park and the applicant regarding contributions that is a matter between those parties.</i>	Noted. This matter was included in the EIS to explain the relationship between Sydney Business Park and IKEA.
11 <i>Council entered into a VPA with Sydney Business Park, but the obligations for contributions only apply to infrastructure that was being delivered as Stage 1 of the</i>	Noted. As indicated in the EIS, we anticipate that Developer Contributions will be levied by Council as a condition of consent as part

Issues	Responses
development. As such, contributions shall be levied for the IKEA Multi-Function Logistics Unit development in accordance with Council's Section 94 Contributions Plan No.21 – Marsden Park Industrial Precinct.	of this approval.
12 Engineering With regard to the road pattern variation, please note that DA-15-1088 for bulk earthworks was approved on 28 August 2015, however this DA does not pre-empt the approval of any future Das on this site.	Noted.
13 The EIS indicates that this proposal does not seek to obtain an Occupation Certificate (OC) for the warehouse until proposed Road No.5 is constructed and dedicated. The Proponent is to ensure that this timing is correct, to ensure that Road No. 5 is completed prior to the issue of any OC so as to ensure that vehicular movements (particularly trucks) do not rely on South Street. Should the operation of this proposal rely on utilising South Street, it may require upgrading by the Proponent to accommodate the activities associated with truck loading/movements.	FDC can confirm that an Interim Occupation Certificate should not be issued until such time that Road No. 5 is constructed. We would expect that an Interim Occupation Certificate could be issued following the construction of Road 5 and that a Final Occupation Certificate could only be issued once the road is dedicated to Council. This has been reflected in the proposed mitigation measures outlined in Section 5.
1 Stormwater Drainage <u>Calibre Estate stormwater design</u> a) The XPRAFTS model provided is not for the study area. The correct model is to be provided to verify basin and culvert sizing. b) The Calibre design flows for culvert M1.9 are significantly different to those quoted for the precinct planning. A full catchment plan and the correct hydrologic model are required to confirm the design flows for this culvert. There has been a change in the catchment draining to this culvert as a result of more detailed post precinct planning investigations (see the attached Existing conditions Catchment Plan prepared by J. Wyndham Prince, reference 109506-04_SKW403, Issue A, Dated 12 May 2015). The Design invert levels for this culvert are significantly lower than those assumed for the S94 design concepts. Proposed concept design levels/long section is required for the downstream channel and basin to demonstrate that the proposed culvert levels work with the proposed downstream infrastructure. c) The HECRAS model is not set up correctly. Additional sections are required	The XP RAFTS model has now been provided to Council. Culverts have been revised now that we have greater certainty in the upstream catchment's and actual flow rates reaching the culverts. The culverts have been downsized and now closely match JWP's culvert dimensions. The invert of the culvert has been confirmed to accommodate road levels and grades. A long section has been prepared for Council's reference. The HECRAS model now incorporates additional concept sketches

Issues	Responses
<i>between the culvert and the upstream and downstream boundary sections.</i>	and long sections as requested.
d) <i>The capacity of the existing culvert under South Street needs to be verified to ensure the proposed basin outlet operates hydraulically as intended.</i>	The capacity of the existing culvert under South Street has been re-examined. Details are provided in Appendix D of the revised Calibre Estate Stormwater Management Plan.
e) <i>The proposed lot layout plan appears to delete a zoned precinct road just east of the IKEA site. Confirmation is required that this is the case and appropriate DCP and SEPP amendments are completed in due course. If this road is not deleted in future then the size of the bio-retention in Basin B will need to be increased. The Design of basin B should allow for the additional road treatment area to ensure either case can be accommodated. The precinct planning results nominated a treatment area of 800m² instead of the 550m² in the current design.</i>	There is certainty that this zoned precinct road has been deleted, however, this does not form part of the current application. Future applications submitted by Sydney Business Park will address this issue.
f) <i>High flow bypass is to be included in the model. The reported 100% capture of gross pollutants is not considered realistic.</i>	The MUSIC model has been adjusted to reflect the high flow bypass rate. The bio-retention area has been adjusted accordingly.
g) <i>The MUSIC model provided does not include Road % draining to basin E. The nominated treatment area appears low relative to the size of the road catchment. Details to be included in MUSIC model.</i>	The MUSIC model has been adjusted to include this road. The bio-retention area has been adjusted accordingly (now 590m ²).
h) <i>Bio-retention details to be consistent with MUSIC modelling.</i>	Bio-retention details have been confirmed and amended.
i) <i>There is no supporting information for the stream stability assessment. Model data files and associated calculations of critical flow threshold are required to verify the statement made in the report. A combined assessment including the proposal IKEA site measures is acceptable.</i>	The stream stability assessment for Basin B is provided within the Marsden Park Industrial Precinct Little Creek Catchment Alternate Stormwater Management Strategy by Bligh Tanner.
j) <i>The existing dam embankment should be reconstructed to ensure its long term stability. It is not clear what the extents of the estate civil works are around basin B and South Street. Dam break assessment will be required prior to construction approval.</i>	The existing dam embankment will be removed and reconstructed as part of constructing the proposed Basin B. Sydney Business Park propose to undertake a Dam Break Assessment as part of detailed documentation. As such, this should be included as a condition of consent. Refer to Section 5.
k) <i>Access to basin B is to be provided from South Street. Interim right of way or easement for access to be provided until future road widening occurs.</i>	Access from South Street has now been refined. The creation of a right of way should be required as a condition of consent. Refer to Section 5.

Issues	Responses
l) <i>Details are required to show how proposed basin B design fits with the proposed IKEA site works. Piped and overland flows from the IKEA site should be directed to bypass the proposed bio-retention in basin B.</i> m) <i>Soils and water management measures such as sediment basins to be designed for the 90th percentile 5 day rainfall as a minimum to minimise impacts on the sensitive downstream environment. Management reassures to be industry best practice complying with EPA requirements and maintained in effective operating condition at all times.</i> n) <i>Council's asset design staff are currently progressing the design of the basin B to mitigate stormwater impacts on the downstream conservation area. Design of basin B and associated works to be approved by Council's manager asset design prior to construction approval.</i>	This will be addressed during detailed design. Refer to Section 5 for an appropriately worded mitigation measure to ensure that this occurs prior to the issue of the relevant Construction Certificate. Noted. Noted.
Cardno Site stormwater design	
a) <i>The proposed basin B detention basin is to be constructed prior to occupation of the IKEA site.</i>	The proposed Estate Basin (B) structure will be constructed and operational as a detention basin prior to the occupation of the IKEA site. This does not include Council's work to install a bio-retention system within Basin B as described within the Bligh Tanner Report. This has been reflected in the proposed mitigation measures outlined in Section 5.
b) <i>The design makes no provision for runoff from the adjoining catchment area to the east. The bulk earthworks plans under DA-15-1088 show some indicative diversion drains along the eastern boundary and these should be shown on the plans. These drains should be sized to convey the existing conditions 100 year ARI flows.</i>	Cardno has included a catchment to the east of the site as part of the sediment and erosion control plan. It has adequate capacity for the 100 year ARI flow. It is important to note, that Calibre has also included the provision for a diversion drain along the eastern boundary of the IKEA site as part of the bulk earthworks package of works.
c) <i>The bio-retention system also relies on effective plant growth to achieve the modelled treatment efficiencies. The current configuration makes it problematic that the plants will receive enough direct sunlight to grow well. A horticulturalist is to confirm that the selected plants will grow well in the design location and site configuration.</i>	Please refer to Section 5 for proposed mitigation measures. An appropriately qualified consultant will provide advice in this regard.
d) <i>The majority of the site drainage flows into the proposed bio-retention system. This can lead to potential scouring, additional hydraulic loading and increased maintenance and renewal requirements. The design of the system shall</i>	Maintenance and operation procedures for the basin, including scour protection will be addressed as part of detailed design documentation issued for construction.

Issues	Responses
<i>document responses to these issues and appropriate 88B instruments registered to ensure effective operation of the system.</i>	
e) <i>Landscaped areas of the site that drain to the bio-retention system are to be included in the MUSIC model.</i>	Landscape areas have now been included in the MUSIC Model.
f) <i>The typical sections show areas of the site graded to flow onto adjoining properties. The site grading is to be amended to only direct flows onto adjoining properties at legal points of discharge.</i>	The boundary interfaces have been adjusted accordingly to ensure that stormwater does not sheet off batters into adjoining properties.
g) <i>The current design grading near pit B03/1 would result in overflows onto adjoining lot and transmission tower. Overflows from this area to be directed to estate basin B and grading amended accordingly to limit water depths in driveway area</i>	Cardno is confident that the design grading can be appropriately addressed during detailed design to direct overflows towards the estate basin in high flow events. Refer to Section 5.
h) <i>Pipe line A01 to be relocated to be clear of proposed basin B bio-retention area. Overland flows from IEKA site to be directed away from basin B bio-retention.</i>	The outlet into the estate basin can be adjusted to be coordinated with the estate basin to ensure it discharges away from the proposed bio-filtration area within the basin. This can be captured in construction design issue. Refer to Section 5.
i) <i>Interface details between site works and basin B to be provided.</i>	Batters are indicated across the transition between the site works and the estate basin.
j) <i>Soil and water management measures such as sediment basins to be designed for the 90th percentile 5 day rainfall as a minimum to minimise impacts on the sensitive downstream environment. Management measures to be industry best practice complying with EPA requirements and maintained in effective operating condition at all times.</i>	Noted. Design documentation has been amended accordingly.

3.2 Roads and Maritime Services

A response to issues raised by RMS is provided below in Table 3.2.

Table 3.2: RMS Issues and Responses

Issue	Response
In the draft EIS (May 2015) provided in the adequacy review, heavy vehicle traffic was to reach Richmond Road via South Street, while staff were to travel via Townson Road. This has changed in the July 2015 EIS, so that staff and heavy vehicles will not travel through Richmond Road/ South Street but will instead travel through Richmond Road/Townson Road. This point was reiterated in Section 4.2 of the Traffic Impact Assessment (TIA) and Section 6.3 of the July 2015 EIS. The egress arrangements from the development appear to be inconsistent with the civil engineering drawings (drawing number 80215051-01-1321, revision 7 in Appendix 6 p. 12) which permits a right hand turn out of the site onto Road 5 towards Richmond Road/ South Street.	Sydney Business Park has designed (and in part constructed) an estate road network linking the site to the Richmond Road/ Townsend Road intersection. This estate road network is capable of supporting both light and heavy vehicle traffic movements associated with the proposal. The current form and condition of South Street is unsuitable for heavy vehicle traffic. The relevant civil and architectural plans have now been updated and are included for assessment.
Roads and Maritime has reviewed the submitted application and raise no objection to the development proposal subject to the civil drawings being amended to reflect the updated access arrangements of all vehicles accessing the site from Richmond Road/ Townson Road intersection.	Noted. Architectural and civil plans have been updated accordingly.
Roads and Maritime wishes to advise the treatment and arrangement of the intersection of Road No 5 and South Street is yet to be determined.	Noted. This is a matter that is being resolved with Blacktown Council.

3.3 Transport for NSW

A response to issues raised by Transport for NSW is provided below in Table 3.3.

Table 3.3: Transport for NSW Issues and Responses

Issues	Response
Design Vehicle The design vehicle (25m B-Double) that has been chosen to test the turning path (internally and at the access point) of the largest heavy vehicle is considered appropriate given the existing heavy vehicle fleet in operation. However, it would be prudent to adopt turning path of a vehicle PBS Level 2B (i.e. up to 30m in length) to test the largest vehicle combination likely to access the development for the foreseeable future. It is however noted that the size of the design	Cardno has assessed the proposed PBS Level 2B design vehicle (i.e., up to 30 metres in length) and can confirm that with some minor on site modifications, the site could accommodate a 30 metre long vehicle. Copies of the track runs are attached for reference as part of the civil design package in Appendix 2. Such vehicles are not required by IKEA as part of their operation as indicated within the EIS. However, if this was to change,

vehicle may be restricted by the geometry of the local road network. Therefore, swept path analyses should be undertaken along the proposed heavy vehicle access route from the subject site to the major freight route (i.e. Richmond Road) to determine the largest vehicle that would be able to access the site. Appropriate conditions should be included in the consent condition restricting the size of heavy vehicle servicing the site to the design vehicle.

minor modifications could easily be made as required.

It seems counterintuitive to restrict the size of vehicles accessing a site on the basis of the objectives contained within the SEPP and the IN1 Zone, particularly if necessary changes can be made in the future as required.

The estate road network has either been designed to accommodate such vehicles or not. If not, IKEA will not change their fleet that services the site. No further assessment is considered necessary.

Active Transport

Walking provision

Pedestrian safety will be critical in this development with the number of heavy vehicle movement. It is recommended that the Traffic Impact Assessment outlines how this development would contribute to provision of pedestrian facilities in accordance with Council's requirement.

A dedicated pedestrian pathway (including crossings) will be provided from the road frontage to the main IKEA office entry in accordance with the provisions of the Building Code of Australia.

Footpaths will be constructed along the proposed Road 5 in accordance with relevant provisions of the Growth Centre DCP. Details of these paths are illustrated in the attached estate civil engineering plans provided within Appendix 3.

Bicycle parking provision

The Traffic Impact Assessment (Section 5.1.4) states that 'Neither the Blacktown DCP nor the RMS guidelines specify any requirement for motorcycle and bicycle parking for warehouses or office'. It is therefore recommended that consideration for bicycle parking provision based on Appendix H of the Cycling Aspects to Austroads Guides (Austroads):

- Light Industry – 1 space per 200 m2 GFA; and
- Office – 1 space per 200 m2 GFA for employees and 1 space per 750 m2 for visitors.

The proposed 12 bicycle parking bays is significantly less than what the Austroads guidance suggests for a 69,033m2 GFA Light Industrial Warehouse and 1,358m2 of Office.

An additional quantum of bicycle parking has been provided however, compliance with Austroads would far exceed the number of staff IKEA will employ. Therefore, 50 spaces have been provided given that IKEA will employ a total of 200 employees on site. One quarter of all staff are unlikely to ride, nor will they be on site all at once given the shift arrangement proposed by IKEA for operation.

Local cycling network

The Traffic Impact Assessment (Section 3.5) indicates that Blacktown Council has plans for developer funded bicycle routes on most of the proposed internal roads which will lead the cyclists to the existing bicycle route on Richmond Road. It is suggested that the Traffic Impact Assessment outlines how this development would contribute to these routes and any gaps following implementation.

Sydney Business Park is responsible for delivering the estate road network, part of which will be facilitated by this proposal. Bicycle routes will be designed and constructed in accordance with the requirements of the Growth Centres DCP.

Construction Traffic Management Plan

TfNSW requests that a Construction Traffic

A Draft Construction Traffic Management

Management Plan (CTMP) be prepared in consultation with TfNSW prior to the commencement of construction. The CTMP needs to specify any potential impacts to general traffic, cyclists, pedestrians and bus services within the vicinity of the site from construction vehicles during the construction of the proposed works. Should any impacts be identified, the duration of the impacts and measures proposed to mitigate these should be clearly identified and included in the CTMP.

Plan was prepared as part of the Environmental Impact Statement. However, Final Construction Management Plan will be prepared in consultation with TfNSW and submitted to the certifier prior to the issue of a Construction Certificate. This has been reflected in the proposed mitigation measures outlined in Section 5.

Workplace Travel Plan

TfNSW requests that a Workplace Travel Plan be prepared for the project to encourage mode shift to sustainable transport, along with consideration of car share schemes and employee incentives.

A Workplace Travel Plan will be prepared by IKEA and submitted to the Certifier prior to the issue of a Final Occupation Certificate. This has been reflected in the proposed mitigation measures outlined in Section 5.

Traffic Assignment Assessment

The Traffic Impact Statement (Section 4.1) states that 'Based on correspondence with FDC Construction & Fitout, traffic generated by the proposed development including staff and heavy vehicles will not travel through Richmond Road / South Street but will instead travel through Richmond Road / Townson Road and hence, the Richmond Road / South Street intersection was not assessed as part of this TIA.'

It is unclear why traffic would not utilise the intersection of Richmond Road / South Street which in the future seems the more direct route to the site. The Traffic Impact Assessment should include justification for the above traffic assignment assumption.

The traffic assessment should be updated accordingly which may require additional intersections (including the intersection of Richmond Road / South Street) to be analysed. The revised traffic assessment should be to the satisfaction of Council and Roads and Maritime Services.

Sydney Business Park has designed (and in part constructed) an estate road network linking the site to the Richmond Road/ Townsend Road intersection. This estate road network is capable of supporting both light and heavy vehicle traffic movements associated with the proposal.

The current form and condition of South Street is unsuitable for heavy vehicle traffic. Blacktown City Council shares this view in their objection which has been addressed above.

The relevant civil and architectural plans have now been updated and are included for assessment.

3.4 Department of Primary Industries

The Department of Primary Industries has made a submission which raises the following issues.

Table 3.4: Department of Primary Industries Issues and Responses

Issues	Response
The western part of the Marsden Park Industrial precinct drains to a tributary of Little Creek which has been identified as a very rare intact chain of ponds but the EIS does not provide any details on the chain of ponds. It is recommended the proposal assesses	Blacktown Council and Sydney Business Park are well aware of the significance of the Little Creek tributary and have invested considerable time and expense to determine appropriate measures to protect the integrity

and provides details on the chain of ponds and implements a monitoring program to monitor the chain of ponds to ensure the proposed stormwater quantity and quality management measures are adequate in mitigating impacts.

of this water course.

The proposed IKEA site provides necessary on site stormwater quality and quantity measures that manage the movement of stormwater runoff before leaving the site. The IKEA site then drains to the proposed Estate Basin B which has been designed in close consultation with Blacktown Council. This design process has been driven by the objectives of Council's proposed Stormwater Harvesting and Diversion Strategy as outlined within the Bligh Tanner 'Protecting Little Creek' Report.

Bligh Tanner has confirmed that this tributary of Little Creek is in the best condition of any creek within the Blacktown Local Government Area and is a rare example of an intact natural chain of ponds creek form on the Cumberland Plain.

Blacktown Council has accepted Bligh Tanner's recommendation which is explained as follows, *'The diversion scenario considers the capture of runoff from the Little Creek Tributary catchment, and pumping of that water to the catchment immediately to the north. While this transfers the problem to another waterway, the receiving waterway is a far from pristine state. It is envisaged that as further urbanisation of the area occurs, then this excess water released into that waterway could be harvested and used for a range of beneficial purposes'*.

On this basis, the proposed IKEA MFLU and estate drainage infrastructure has been designed to protect the integrity of the Little Creek tributary.

The Bligh Tanner Report is provided within Appendix E of the Calibre Consulting Report (Appendix 3 of this report).

Clarification is required as to whether:

- The proposed stormwater detention basin/temporary sediment basin will be constructed prior to the clearing/bulk earthworks commencing on the IKEA site associated with the DA, or prior to any construction activities commencing with the IKEA SSD project.
- The bio-filtration basin will be constructed to treat runoff from the IKEA site during construction activities, or

An existing dam is currently located in the same position as the proposed Estate Basin (B). This dam will act as part of soil and sediment controls measures during bulk earthworks and construction activities associated with this proposal. Bulk Earthworks were approved by Blacktown City Council under DA15/1088. The estate basin proposed as part of this application will be formally constructed and become operational prior to the issue of an Occupation Certificate for the broader development proposed by this application. The permanent basin cannot be constructed prior to bulk earthworks

The proposed bio-retention structure along the western IKEA site boundary concurrently with the building. It will be completed

during the operation of the project. Bio-retention basins require well established vegetation and details are required as to when the bio-retention basin / swale will be constructed and when the vegetation in the basin will reach maturity and be fully functional in terms of treating runoff from the IKEA development.

- A gross pollutant trap will be installed upstream of the bio-filtration basin / bio-filtration swale to assist prevent the bio-retention basin / systems from becoming clogged with pollutants and sediment.

The SEARs for SSD-6954 require an assessment of potential groundwater impacts associated with development but the EIS has not addressed this issue. An assessment of groundwater related impacts associated with the project and potential consequences on the chain of ponds and the conservation area should be completed prior to approval.

(including installation of planting), prior to the completion of the project so that it is fully operational at the time of issuing an Occupation Certificate. Vegetation within the basin will of course, continue to mature over time.

During construction appropriate soil and sediment control measures will be installed to manage offsite impacts associated with stormwater runoff. This is typical for most construction projects where temporary soil and sediment controls are installed for the duration of construction.

A Gross Pollutant Trap will be installed upstream of the proposed Bio Retention Basin as illustrated by the attached Civil Plans (prepared by Cardno)

JK Geotechnics were engaged to prepare a preliminary geotechnical investigation of the site. In response to this matter, JK Geotechnics were asked to specifically address the likelihood of impacts to groundwater as a result of the approved bulk earthworks subject to DA 15/1088. These works will be completed by the end of November 2015. They provided the following feedback:

'In general, the proposed development will require cut and fill earthworks to a maximum depth of about 2m and height of about 4m. For the cut portions of the earthworks, excavation will extend through the soil profile and into the upper weathered bedrock strata. We further understand that all stormwater from the site will be directed to a stormwater detention basin immediately adjacent to the site, on its western side.

Given the above, we consider the proposed development will not adversely impact on global groundwater flows. Some localise groundwater seepage from perched water tables may occur during the earthworks, and in the permanent case, minor seepage at the soil/bedrock interface may occur in cut batter slopes. Such seepage will be directed to the stormwater system.'

Minimal impact is therefore anticipated by the works proposed as part of this application.

3.5 Environment Protection Authority

The Environment Protection Agency (EPA) has confirmed (by correspondence dated 3 September 2015) that the proposal does not constitute a *Schedule Activity* under the *Protection of the Environment Operations Act 1997* and as such, the EPA has no comments in regard to the proposal.

3.6 Sydney Water

Sydney Water has provided a written submission dated 11 September 2015 which outlines the following matters.

Table 3.5: Sydney Water Issues and Responses

Issues	Response
The proposed development is located within the Marsden Park Industrial Precinct. The precinct was released under the NSW Government's Precinct Acceleration Protocol (PAP). Under the PAP, the PAP proponent is required to deliver the necessary water and wastewater infrastructure to service the precinct. As Sydney Water has been chosen as the water related service provider for Marsden Park Industrial, we have a servicing strategy for the project.	Noted. Sydney Business Park is responsible for delivering all services to the site to facilitate occupation of the proposed IKEA proposal. The provision of estate water and sewer infrastructure that services the IKEA proposal forms part of this application.
Water Servicing The proposed development will be serviced by an extension of the Minchinbury water system via a new 200mm water main from the existing main in Hollinsworth Road.	Noted.
Wastewater Servicing The proposed development site is located in the wastewater catchment for the new Wastewater Pumping Station, SPS1160 (within the adjacent Marsden Park precinct). The new pumping station and associated pressure mains will transfer wastewater to the Riverstone Wastewater Treatment Plant. The adjacent Marsden Park precinct was also released under the PAP. The PAP proponent for the first stage of development in the Marsden Park precinct is therefore responsible for delivering the new pumping station to which wastewater from the proposed development will ultimately drain. As Sydney water is not delivering this work we do not have a committed delivery date for when the pumping station will be commissioned. While the proposed development is located within the catchment of the future pumping station, lead in mains will be needed to extend services from the new development to the trunk infrastructure. An indicative plan of the lead in infrastructure is provided in Attachment 3. As this lead in infrastructure will service both part of the Marden Park and Marsden Park Industrial precinct, the PAP proponents are ultimately responsible for the planning, design and delivery of this infrastructure. The timing and staging of the lead in infrastructure will be dependent on the timing and staging of development within the catchment of the lead	Sydney Business Park (Marsden Park Developments Pty Ltd) is the Precinct Acceleration Proponent (PAP) for the Marsden Park Employment Precinct. SBP has been working with Sydney Water to deliver reasonable and efficient infrastructure to the North West Growth Centre and in particular the Marsden Park Industrial Precinct (MPIP). The IKEA MFLU is located in the Western Catchment of the MPIP which is intended to drain to SP1160 via a gravity sewer system. As noted by SWC in their submission, SP1160 has not yet been constructed. SBP can advise that the current proposed program is for SP1160 to be commissioned in September 2017. SBP has commenced the gravity sewer design to this station from the MPIP Western Catchment (including the IKEA MFLU Site). The method of supply for sewer will require gravity sewer construction from the IKEA MFLU to an interim pump out facility to be located on SBP owned land (Lot 2 in DP 1208554). This will allow sufficient storage in the upstream gravity sewer network as well as providing a convenient location for connection to the future receiving sewer. Flows from the IKEA MFLU will be extremely low for a 12.5ha site making management of this facility very straightforward. It is expected that this

in.

If the proponent wishes to consider short term wastewater servicing options for the proposed development before the ultimate infrastructure is delivered, detailed assessment of the proposal will be required and be subject to the following information:

- Timing and staging of ultimate services;
- Preliminary development program including lot registration and occupancy;
- Potential alternate servicing options; and
- Proposed wastewater flows.

As the proposed development is within a Precinct Acceleration Protocol area, the work will need to be delivered in line with Sydney water's Precinct Acceleration Protocol Guidelines available on our website.

facility will need to be in place for approximately 12 to 14 months. Following this period, the connection will be made to drain north to the pumping system and Riverstone STP. This arrangement has the added benefit of providing immediate flow to the gravity line once they are completed, increasing the operational efficiency of the network.

Attachment 1

Sydney Water Servicing – A Section 73 Compliance Certificate under the Sydney Water Act 1994 must be obtained from Sydney Water.

Building Plan Approval – you must have your building plans stamped and approved before any construction is commenced.

These matters are typically addressed through appropriately worded conditions of consent. This has been reflected in the proposed mitigation measures outlined in Section 5.

Attachment 2

Trade Waste Requirements

Backflow Prevention Requirements

Contingency Plan Recommendations

These matters are typically addressed through appropriately worded conditions of consent. This has been reflected in the proposed mitigation measures outlined in Section 5.

3.7 Office of Environment and Heritage

Office of Environment and Heritage has provided a written submission dated 18 September 2015 which outlines the following matters.

Table 3.6: OEH Issues and Response

Issues	Response
<i>OEH has reviewed the EIS for the proposal and notes a separate development application which incorporates clearing and bulk earthworks on the site is currently being considered by Blacktown Council (DA15/1088). According to the EIS, the assessment of DA15/1088 has entailed a consideration of impacts associated with flora, fauna and Aboriginal archaeology. Please find attached a copy of OEH's advice in relation to Aboriginal cultural heritage assessment requirements for DA15/1088.</i>	Noted. Blacktown Council has issued consent for DA15/1088 and works have commenced and are expected to be completed by end of November 2015.
<i>While OEH has not considered the biodiversity issues associated with DA15/1088, it is noted</i>	Noted. The site drains to a proposed estate basin (B) located to the west of the site.

the site is biodiversity certified under Part 7AA of the Threatened Species Conservation Act 1995 which negates the requirement for threatened species impact assessment under s.5A of the Environmental Planning and Assessment Act 1979. OEH also notes, however, that the site drains west into high biodiversity value non-certified land as zoned Environmental Conservation and Public Recreation-Regional which will be incorporated into future OEH parks estate.

This basin is being constructed in accordance with Council's Stormwater Harvesting and Diversion Strategy as outlined within the Bligh Tanner 'Protecting Little Creek' Report.

Blacktown Council has accepted Bligh Tanner's recommendation which is explained as follows, 'The diversion scenario considers the capture of runoff from the Little Creek Tributary catchment, and pumping of that water to the catchment immediately to the north. While this transfers the problem to another waterway, the receiving waterway is a far from pristine state. It is envisaged that as further urbanisation of the area occurs, then this excess water released into that waterway could be harvested and used for a range of beneficial purposes'.

This strategy will help to preserve the integrity of this catchment.

The Bligh Tanner Report is provided within Appendix E of the Calibre Consulting Report (Appendix 3 of this report).

To assist in ensuring stormwater runoff from the development does not impact the high biodiversity values of these areas, 'ideal' stormwater outcome water quality and environmental flow targets, in accordance with the Blacktown City Council Growth Centre Precincts Development Control Plan (DCP), were recommended by Council and included in the Secretary's Environmental Assessment Requirements. OEH notes the EIS has applied lower stormwater targets deeming the 'ideal' targets 'excessively onerous'. OEH is of the view that the development should have no indirect impacts on the high biodiversity values of the adjoining and downstream lands and therefore strongly supports the application of the DCP 'ideal' stormwater targets. It is recommended the development not be approved unless it can be demonstrated these targets can be achieved.

For clarity, the proposed IKEA site provides on-site water quality measures to address the various requirements of Council's DCP. The site drains to an Estate basin which has also been designed in consultation with Council to incorporate an approach to diverting stormwater runoff away from the Little Creek catchment as outlined above and addressed in the Bligh Tanner report contained in Appendix 3.

The abovementioned strategy achieves the 'ideal' stormwater targets set by the DCP to protect biodiversity values of lands downstream of proposed estate Basin B.

3.8 Transgrid

Table 3.7: Transgrid Issues and Response

Issues	Response
<i>Earthing modifications to the transmission towers on the subject site must be undertaken at the developer's expense. An Earthing Study to determine the most appropriate modified earthing design must be undertaken in the first instance, followed by the actual earthing modifications to be undertaken taking into account the findings of the earthing study.</i>	IKEA acknowledges that an Earthing Study is required to inform necessary earthing modifications. FDC has applied to TransGrid for a fee proposal to carry out this study and is awaiting a response. Earthing works will need to be undertaken prior to the issue of a relevant Construction Certificate for works within 30 metres of the

<i>TransGrid requires a written undertaking that the developer will reimburse TransGrid for the costs associated with the earthing study and the actual earthing modification works, before works can commence. Further, all earthing modifications must be undertaken before any development work within 30 metres of the towers can commence.</i>	tower. Refer to Section 5 in relation to a proposed mitigation measure.
<i>Any fencing proposed along TransGrid's easement will need to be assessed by TransGrid's Engineering Department with regard to the type of fencing proposed before final consent can be granted. Prior to establishing the type of fencing required, the aforementioned earthing study is required to assist in the fencing type selection.</i> <i>Once fencing arrangements have been established and agreed between TransGrid and the developer, this will need to be earthed and every second panel isolated from the next pair of panels.</i>	Appropriate fencing designs will be submitted to TransGrid for approval prior to the issue of the relevant Construction Certificate. Refer to Section 5 for proposed mitigation measures in this regard.
<i>Any landscape proposed along TransGrid's easement will not be able to exceed a mature growth height of 3 metres.</i>	Noted. Refer to Section 5.
<i>TransGrid will require twenty-four hour vehicular access to our transmission towers at the abovementioned site. In addition, as discussed with the developer this may require barricading an exclusions zone around the tower for a period while maintenance works are being conducted. To this end, TransGrid will endeavour to pre-arrange this with the occupants (within reason) prior to commencing maintenance works.</i> <i>TransGrid will require on-grade crushed rock pavement for the ground surface between the IKEA concrete hardstand areas and TransGrid's stanchions. In addition, as discussed with the developer, this will need to withstand the weight of a 30-tonne truck for Transgrid's access and maintenance vehicles. Any damage to this ground surface will be at the cost of the occupants.</i> <i>Further discussions between TransGrid and the Developer are required for a proposed sliding gate to be situated at the northern end of this site. To this end, the exact requirements for any proposed boundary fencing along TransGrid's easement will be established from the earthing study. Therefore, after this study is completed, TransGrid will then be in a position to finalize and confirm any proposed boundary fencing with the developer. This however needs to be conditioned in any initial consent granted for the proposed development.</i>	TransGrid approval for fencing will be sort prior to the issue of the relevant Construction Certificate. Refer to Section 5 for further details.
<i>Height restriction must be applied to cranes, elevated work platforms plus any other plant</i>	Noted. Refer to Section 5. This will also be incorporated into a Construction

<i>and equipment proposed to operate on the easement. All mobile plant and equipment that is capable of exceeding a height of 4.2 metres is not permissible within the easement.</i>	Management Plan for works on site.
<i>No mounds of earth or other materials may be left on the easement during and after earthworks, even on a temporary basis, as doing so effectively creates a hazard by reducing the vertical clearances to the transmission lines.</i>	Noted. Refer to Section 5.
<i>During construction, traffic control measures need to be implemented to prevent vehicles colliding with TransGrid's transmission towers. Any temporary fencing will need to be earthed and every second panel isolated. No works are permitted within the 20metre exclusion zones around TransGrid's towers.</i>	Noted. Refer to Section 5.
<i>All works must be carried out in accordance with the NSW WorkCover 'Work near Overhead Power Lines' Code of Practice 2006. Please also refer to the accompanying TransGrid Easement Guidelines for Third Party Development and contact TransGrid in the event of any uncertainty.</i>	Noted. Refer to Section 5.
<i>TransGrid requests notification before any construction work commences. This is to ensure a TransGrid Easement Officer attends the site induction and can access the construction site as required and from time to time mindful of any key safety issues pertaining to TransGrid's infrastructure.</i>	Noted. Refer to Section 5.
<i>TransGrid requests formal notification to the proposed development as approved including changes to ground surface levels within the easement.</i>	Noted. Refer to Section 5.
<i>This letter serves as TransGrid's formal conditional consent to the proposed development (SSD 6954). We also note the applicant has advised amended architectural drawings will be supplied to Department of Planning and TransGrid corresponding to the civil design layout. To this end, TransGrid's conditional consent is based on these plans being amended and re-submitted to TransGrid with particular reference to removal of a pallet storage area at the northern end of this site. Also the applicant will update their architectural plans to reflect the ground surface materials to be used within a portion of our easement and further discussion is required between the applicant and TransGrid.</i>	Noted. Please refer to the attached, revised plans that address these matters.

4.0 Revised Proposal

The following design changes resulting are proposed as a result of the exhibition process. Revised architectural drawings are provided within Appendix 1 and should form the basis of the Department's final assessment.

- External façade modifications to address design quality concerns;
- Repositioning of the proposed pallet storage area to the north, eastern boundary;
- Minor civil engineering design changes to address Blacktown Council concerns;
- Boundary fencing and retaining walls more clearly illustrated on architectural plans;
- 50 bicycle parking spaces are now provided on site;
- Provisional car parking arrangement plan to satisfy Council's car parking requirement in the event that IKEA's staffing requirements change or IKEA vacate the facility;
- Minor changes to address Transgrid Requirements;

4.1 Design Approach

The following section describes the approach to identifying architectural design solutions for the proposal in response to public exhibition. There are a number of matters that require explanation and clarification to ensure that resulting design outcomes can be understood and appreciated.

The proposed IKEA MFLU will have a total floor space of 69,033m². Around 83 percent (57,308m²) is characterised as standard height warehouse with a maximum (and compliant) height of 13.7 metres at the ridgeline. This warehouse, although quite large, is characterised by typical design features for similar buildings throughout Western Sydney, including steel framing, metal cladding and pre-cast concrete dado walls to a height of 1 metre (around the perimeter).

The proposed automated high bay warehouse represents 17 percent of total floor space (11,739m²) and is positioned as part of the broader building as illustrated below:

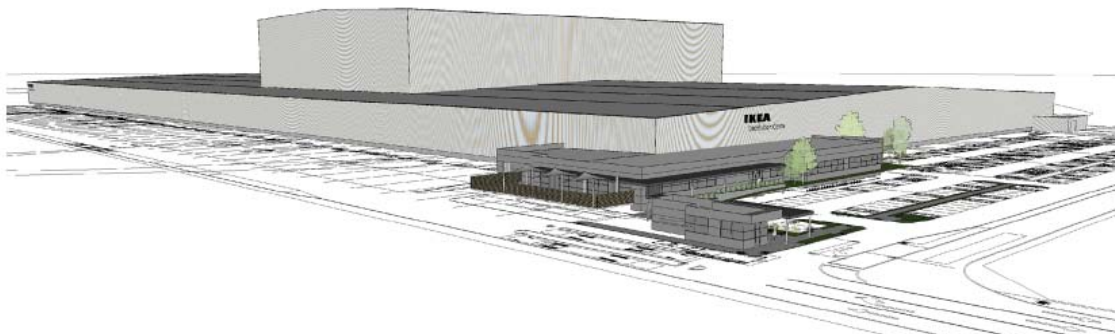


Figure 4.1: 3D Model of Proposal – South West Corner

Figure 4.1 provides a basic illustration of the proposed structure, emphasising the scale of the automated highbay warehouse in the context of the overall warehouse. It is positioned as follows:

- 101 metres from the southern elevation of the standard height warehouse;
- 237 metres from the future kerb line of Road 5;
- 198 metres from the northern elevation of the standard height warehouse;
- 218 metres from the future kerb line of Road 4;
- 72 metres from the eastern boundary; and
- 73 metres from the western boundary.

The installation of nine Automatic Storage and Retrieval Systems (ASRS) within the high bay warehouse presents significant benefits for the operational capacity of the MFLU. The system is designed to more efficiently store and retrieve IKEA's product range and is only made viable within a high bay warehouse such as that proposed. High bay warehouses, such as this are common throughout Europe with only a few examples located in the Sydney basin.

While minor variations occur between different automated racking systems, fundamentally the form and structure of an automated highbay warehousing is derived from the internal racking infrastructure. It is designed to store the anticipated weight of goods as well as the weight load generated by the material enclosing the structure. This is a key difference between standard warehouse buildings where the building structure is independent of internal racking and is therefore more easily varied (either in shape or with materials). Examples of automated highbay racking systems (under construction) are illustrated below for reference:

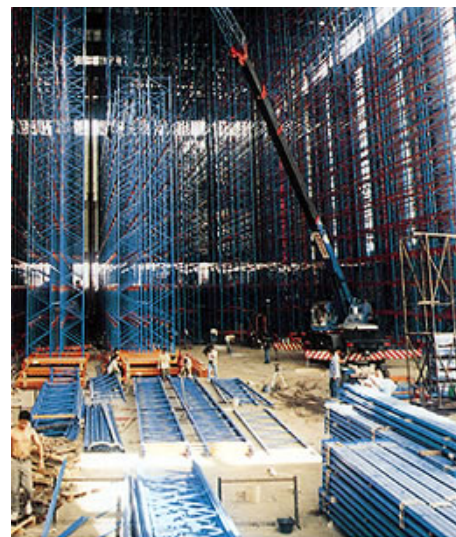
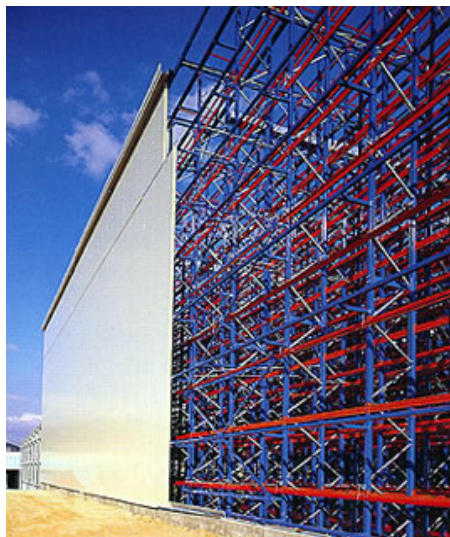


Figure 4.1: High Bay Racking/ Structural Installations

The automated system's structural requirements limit options available for altering or articulating the built form. Metal cladding is the most appropriate material due to its relative weight and simplicity of installation at high level. The following images illustrate examples where such treatment has occurred in Sydney and more broadly throughout the United States and Europe, including other similar IKEA facilities.



Figure 4.2: Blum, Hoxton Park (from M7) (Google 2015)

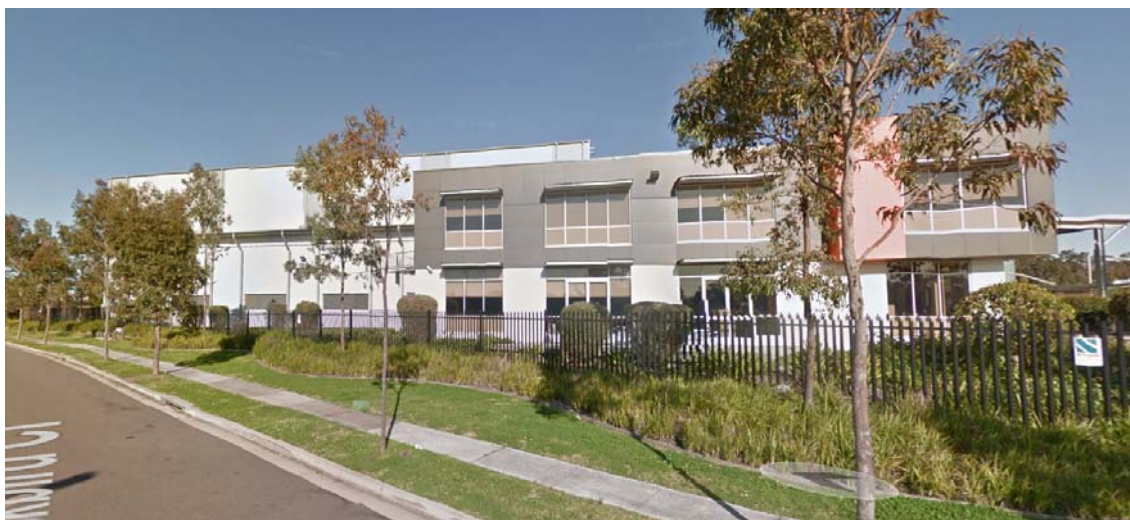


Figure 4.3: Blum, Hoxton Park (from Blackbird Close) (Google 2015)



Figure 4.4: Synnex, Lidcombe (from Birnie Ave) (Google 2015)



Figure 4.5: Synnex, Lidcombe (from Birnie Ave) (Google 2015)



Figure 4.6: IKEA, (IKEA 2015)



Figure 4.7: Highbay Warehouse, USA



Figure 4.8: IKEA, USA (IKEA 2015)



Figure 4.9: IKEA, (IKEA 2015)

Blacktown City Council raised concern about the lack of architectural design quality of the proposal. Council had previously indicated that,

‘The proposed elevations being a single coloured colorbond metal cladding finish, bulky design, exceeding the permissible height limit is considered to be unsatisfactory. There is no variation in the roof form and limited variation in the façade of the building’.

In response to Council's concern, the design team re-examined opportunities to vary the building facades with consideration of the constraints associated with automated storage systems. Focus was also placed on the standard height warehouse to provide additional variation to the northern and southern facades. The principle of avoiding IKEA corporate colours (IKEA blue or yellow) remained to avoid customer confusion between the MFLU and the IKEA store located nearby on Richmond Road.

A meeting was held with representatives of Council, IKEA, FDC and Sydney Business Park on 21 October 2015. This meeting provided an opportunity to explain design constraints (as outlined above), and to collaboratively discuss and consider a series of design options. The following options were presented:

Barcode Concept (Idea 1)

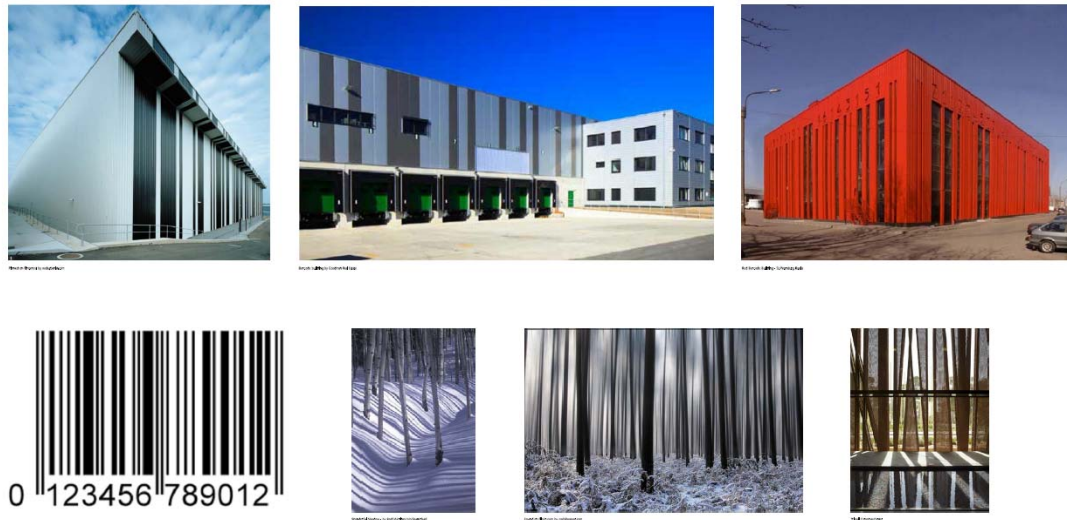


Figure 4.10: Inspiration Images for Barcode Concept



Figure 4.11: Barcode Design Concept

The barcode design concept incorporates vertical colour variations in metal cladding that help to unite low and high bay warehouse structures. The barcode is a well-recognised feature of retailing and reflects the basis of IKEA's business. The buildings appearance would vary depending on light availability and viewpoint (close or distant) but certainly helps to introduce colour and variation to the northern and southern facades. Caution remains about over emphasising the high-bay warehouse to avoid it becoming more visually prominent, particularly from a distance.

Skyline Concept (Idea 2)

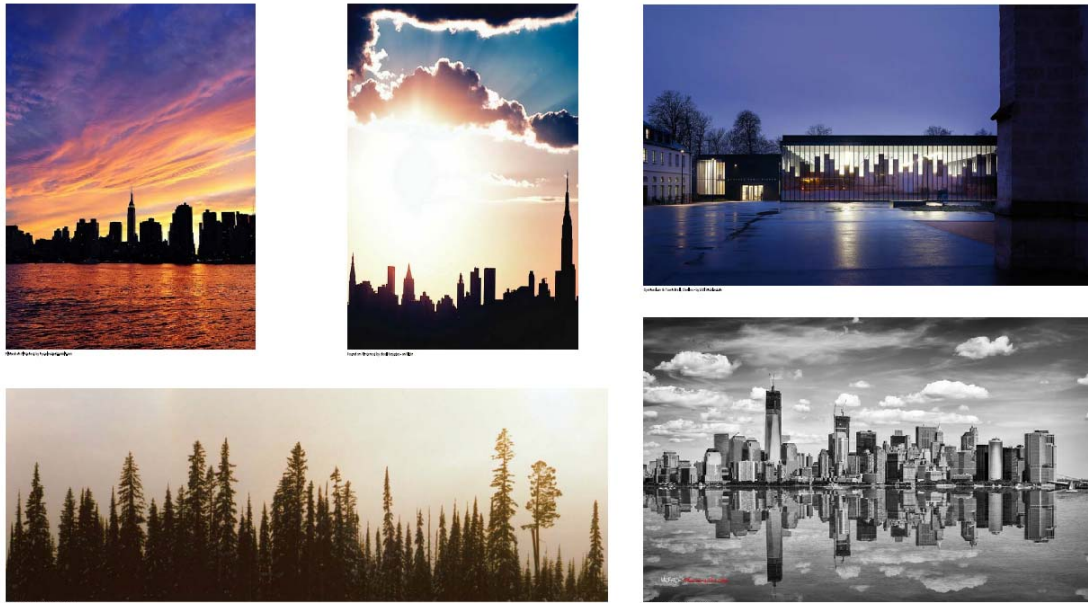


Figure 4.12: Inspiration Images for Skyline Concept

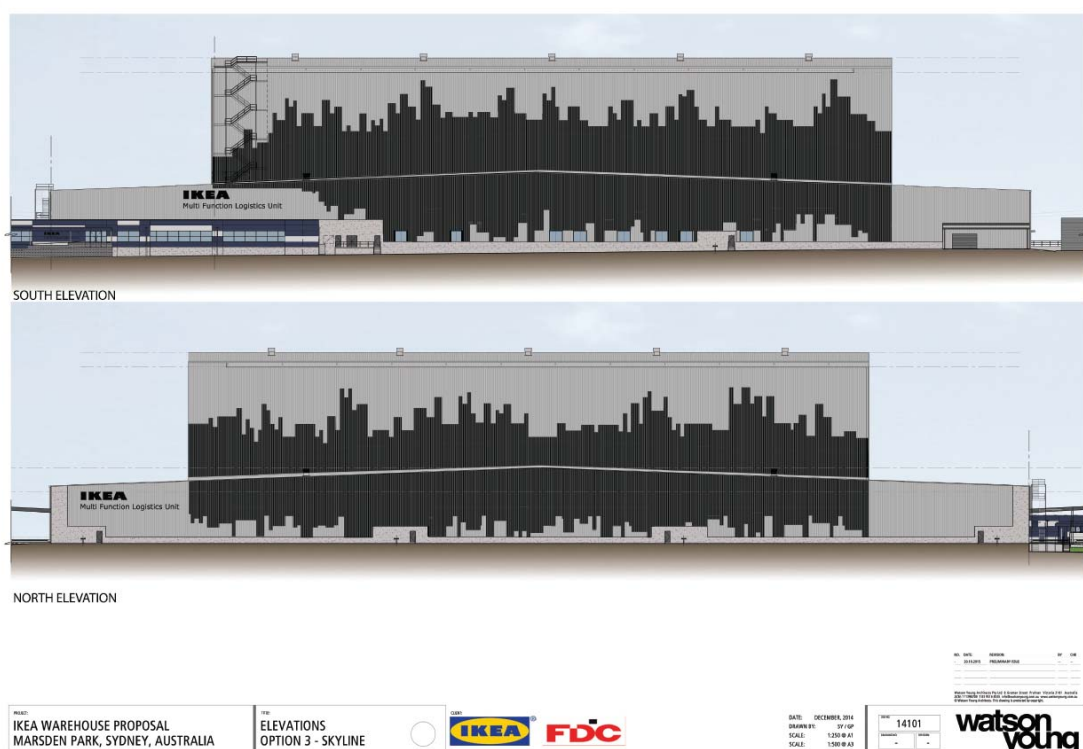


Figure 4.13: Skyline Design Concept

The skyline design concept provides solid but articulated pattern that helps to distract the eye through the use of a dark colour to emphasis the lower part of the built form and to create a more distinctive edge. The pattern is mirrored down across the façade of the standard warehouse providing an articulated pattern at eye level on site. These patterns can be achieved through the installation of metal cladding with irregular interfaces to the next colour.

Flat-pack Concept (Idea 3)



Figure 4.14: Inspiration Images for Flat-pack Concept



Figure 4.15: Flat-Pack Design Concept

The 'Flat- Pack' is iconic to IKEA and provides an opportunity to reflect a key characteristic of IKEA's business through the built form. Metal cladding can be used to compartmentalise the elevations, creating interest through colour and the irregularity of patterns.

Each idea was presented to Council and was followed by broad discussions about colour choice and personal preferences. The discussion also re-considered that over emphasising the high bay structure could lead to it becoming more visually prominent than is otherwise necessary or desired. Council requested a further variation of the Flat-Pack concept to exclude colour variation to the high bay structure. The concept below was then submitted to Council:



Figure 4.16: Flat-Pack Design Concept (Revised)



Figure 4.17: 3D Visualisation

In the days following the meeting, Council provided email correspondence (dated 2 November 2015) indicating that advice had been sought from Council's internal architect. The following comments and sketches were provided:

'The best way to articulate the building to change its visual appearance is to focus on the cube that sticks above the low, flat component. Given that it is safe to assume it has been designed to its minimum dimensions it will be a case of building the envelope out to cast some shadows.'

Two things worth trying are:

1. Creating a slot of about 6m (2 storeys) height at the junction of the cube and base by building out the upper portion of the cube by 1.5m or so to create a 3-part composition: base, recess and top. Onto this you overlay the patterning we talked about but keep the recess very dark in colour and use a light/dark random patterning to the top.
 2. Creating some vertical build outs at random widths and centres for the full height of the cube such that shadows are cast on the facade of the cube component. The build outs would be no less than 1.5m deep and varying widths of not less than 1.5m wide and up to 6m wide.
 3. A combination of 1 and 2 above.
- Preference in order is 3, 1, 2'

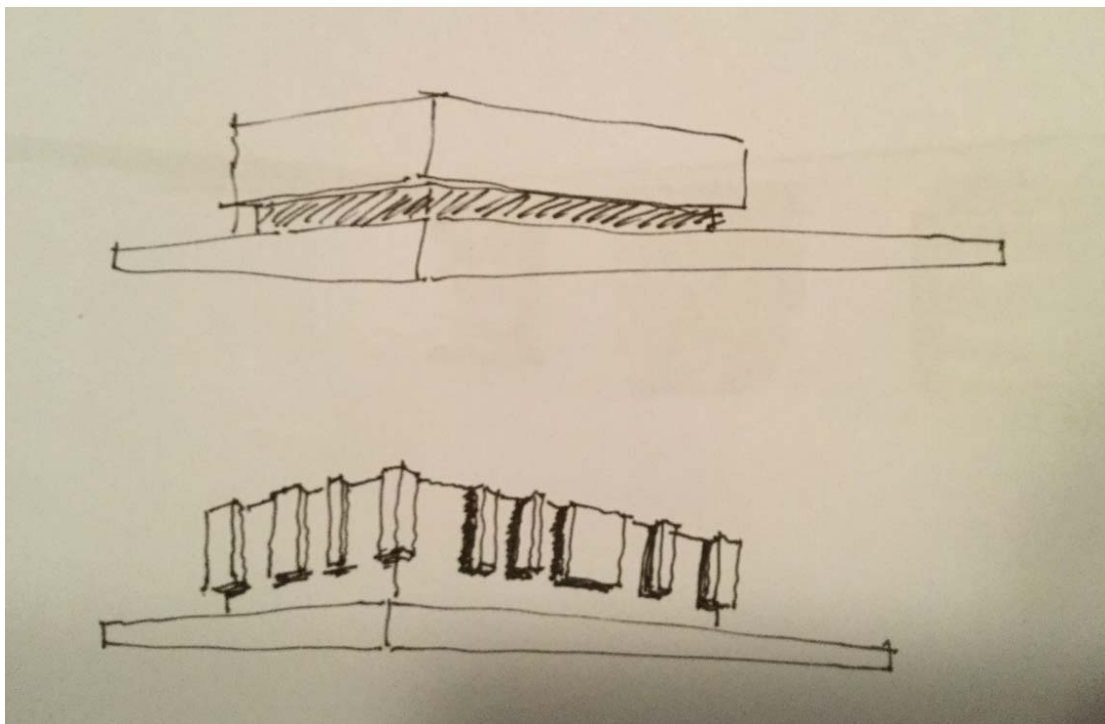


Figure 4.18: Council Architectural suggestions for treating high bay warehouse

Despite the appeal of these options, they offer little help due to the limitations associated with automated high bay warehouse and the way in which it is designed and constructed. Furthermore, it is unlikely that option 1 would be visible from site or surrounding areas given its position, setback from the eaves of the standard warehouse.

In the interests of advancing the project, and knowing that Council's request to change the high bay structure cannot be accommodated, IKEA has decided to resubmit the attached architectural options which are most clearly illustrated by the architectural plans and the photomontage images in Appendix 1. These plans should now form the basis of the Department's assessment.

4.2 Further Consideration of Visual Impact

The proposed automated highbay warehouse will generate visual impacts for the existing local environment. Whilst an important consideration, visual impacts in the context of anticipated future development are equally important in assessing long term impacts for this proposal, particularly given the expectation for change within this precinct.

As demonstrated within the site line photos that form part of the architectural package, the building will be visible from surrounding areas. The following points should be considered when assessing visual impacts within the current landscape:

- The highbay warehouse is not visible from Richmond Road because of the relative level of the road corridor and the existing development and vegetation that exists in between. The extent of development will continue to expand reducing the likelihood of visibility from Richmond Road even further;
- Whilst options were considered to provide colour and pattern variation to the highbay warehouse, the overwhelming view of the project team was to avoid over emphasising the structure. As illustrated by the attached site line images, the simplistic approach to design allows the facades to more easily blend into the skyline. Stark colour contrasts would over emphasis the structure and make it more apparent from a distance;
- Existing vegetation outside of the proposed extent of IKEA and estate works will remain until future development proposals warrant their removal. Therefore, in the short to medium term, the existing vegetation screening the proposal will remain, particularly to the north, west and south;

The North West Growth Centre is fundamental to the continued growth of the Sydney Metropolitan Region. *State Environmental Planning Policy (Sydney Region Growth Centres) 2006* was designed to establish a coordinated statutory framework to facilitate development throughout the area.

The Marsden Park Industrial Precinct is zoned to accommodate a wide variety commercial and industrial activities throughout different precincts as illustrated below:

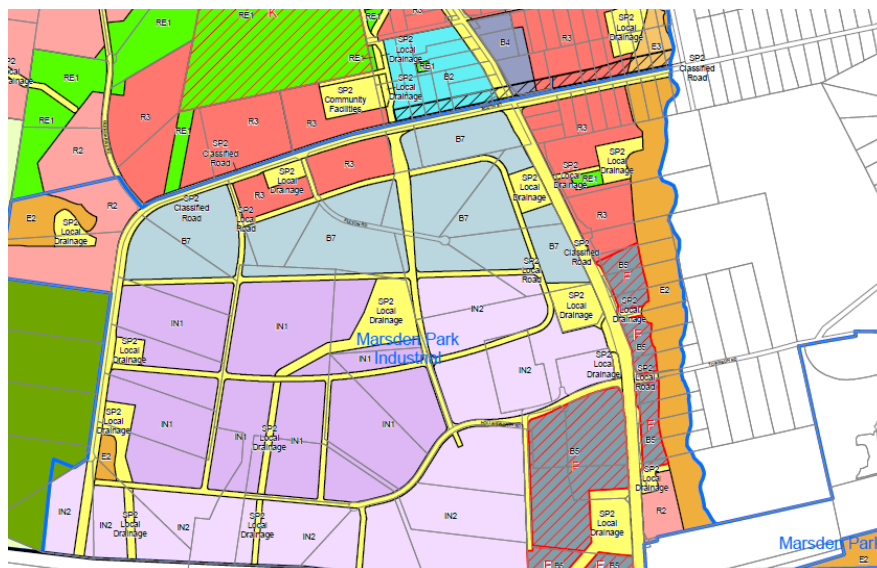


Figure 4.19: Land Use Map – Marsden Park Industrial Precinct

The IKEA site is located within the IN1 General Industrial zone and will be surrounded by other similar industrial developments both in nature of land use and scale of built form. All such development is in line with expectation for growth envisaged by the State Government and Council.

Furthermore, the proposed IKEA building will occur on a 'battle-axe' allotment. Smaller industrial buildings will be constructed along the frontage to Road 5, thereby eliminated direct views of the proposal from that road corridor. This is likely to happen sooner rather than later given that road and services infrastructure will be available upon completion of this project, making land available for immediate development. This will also occur to the west with future development fronting South Street.

The visual impact of the proposed building will be appropriately mitigated through the provision of an 8 metre landscape setback by the time that Estate Road 4 is constructed (along the northern boundary). The highbay warehouse is unlikely to be a dominant feature from this elevation given the height of the standard height warehouse and the distance to the elevation of the high bay structure.

The proposed highbay warehouse has been designed and positioned to ensure that it is integrated with the overall development. It is positioned central to the main warehouse structure so that the proposed height and scale cannot be read when in the immediate vicinity of the building on site.

The proposed visual impacts of the highbay warehouse are reasonable on the basis that the structure is characteristic of industrial functions of an industrially zoned locality. The adage, 'form follows function' is fundamental to industrial development, particularly in regard to this proposal. The functionality of this building is essential to its viability and therefore its conformance with the key objectives of the land use zone.

4.3 Revised Clause 4.6 - Exceptions to development standards

As indicated previously, the proposal involves constructing an automated highbay warehouse that would be 34.7 metres high. This section of warehouse represents approximately 17 percent of the total warehouse floor space. The proposed height exceedance would contravene Clause 4.3 (Appendix 5) of SEPP (Sydney Region Growth Centres) 2006 that permits a maximum height of 18 metres for new development.

Following exhibition, the Department has requested further examination of possible impacts in the context of Clause 4.6 of SEPP (Sydney Region Growth Centres) 2006 to justify the proposed height exceedance. More specifically, an expanded review of relevant environmental planning grounds and likely visual impacts is required to assist DoPE in determining whether to permit the proposed variation. The Department has also requested that the applicant demonstrate that design variations have been considered with respect to the height and bulk of the development.

Clause 4.6 of Appendix 5 relates to '*Exceptions to development standards*' and allows the consent authority to consider, '*a written request from the applicant that seeks to justify the contravention of the development standard by demonstrating:*

- a) *that compliance with the development standard is unreasonable or unnecessary in the circumstances of the case, and*
- b) *that there are sufficient environmental planning grounds to justify contravening the development standard'.*

The following section provides such justification and confirms that the proposal is, '*in the public interest because it is consistent with the objectives of the particular standard and the objectives for development within the zone*'.

IKEA's decision to construct a high bay section of warehouse is essentially driven by the efficiency that comes with automated warehouse infrastructure now available in the industry. It has also been driven by the high cost of land in Sydney.

The following table has been prepared to assess relevant issues to justify the proposed contravention and illustrate its importance to the success of the project.

Table 4.1: Clause 4.6 - Exceptions to Development Standards

Test	Comment
IN1 General Industrial – Zone Objectives	
<i>To provide a wide range of industrial and warehouse land uses.</i>	The proposal involves the construction of a new warehouse for IKEA to undertake storage and distribution of their products throughout Australia.
<i>To encourage employment opportunities.</i>	The proposal involves the creation of 370 jobs on site. IKEA will directly employ 200 staff to operate the facility. While this involves some consolidation from existing warehouse facilities, most positions will be new jobs created to service IKEA's growing online business.
<i>To minimise any adverse effect of industry on other land uses.</i>	This report has assessed potential impacts of the proposal on existing land uses and has proved that any impacts are minimal or can be appropriately mitigated. Such impacts should be considered in the context that the broader locality is undergoing significant transformation with IKEA being the first of many industrial developments to take place over coming years. The proposed building height does not result in overshadowing impacts that would affect current or future adjoining land uses. While it will result in visual impacts for the current environment, such impacts are exaggerated while surrounding lands remain undeveloped. The visual impact would not be as significant if the locality was already an established industrial area. Therefore visual impacts are expected to become less exaggerated as the locality develops as is anticipated by the Growth Centres SEPP.
<i>To enable development for the purpose of retail premises only where it serves convenience needs, or where the goods or materials sold are of a type and nature consistent with</i>	Not applicable with reference to the height of the proposal.

Test	Comment
construction and maintenance of buildings.	
Clause 4.3 Height of Buildings (Objectives)	
(a) to establish the maximum height of buildings on land within the Marsden Park Industrial Precinct,	The maximum height established by the SEPP is appropriate and would accommodate the majority of typical industrial developments seen throughout NSW and Australia. The majority of the proposed warehouse footprint (83%) stands at a height of 13.7 metres (measured to the ridgeline) and would otherwise be permissible. The highbay warehouse is unique to this proposal and is a direct result of functionality requirements of IKEA and their proposed operation.
(b) to provide for a range of building heights in appropriate locations that provide a high quality urban form,	The proposed highbay warehouse has been designed and positioned to ensure that it is integrated with the overall development. It is positioned central to the main warehouse structure so that the proposed height and scale cannot be read when standing adjacent to the building. While it will be visible from a distance, the facade remains plain to avoid concerns about over emphasising the high portion of warehouse with excessive colour variation or material articulation.
(c) to provide appropriate height controls for commercial, industrial and residential development,	The height control is considered appropriate for the majority of industrial buildings anticipated throughout the area. However this proposal involves the construction of a tailored solution to enclose critical infrastructure required by the proponent to operate with maximum efficiency. This situation is unique and is therefore a perfect example where Clause 4.6 would be used to create flexibility for particular circumstances.
(d) to establish parameters for and promote a high quality built form,	The proposed highbay warehouse has been designed and positioned to ensure that it is integrated with the overall development. The overall development has been designed to ensure that a high standard of built form and urban design is achieved. As the locality evolves over coming years, the proposal will be well suited in the context of surrounding development. The northern and southern elevations of the standard height warehouse has been articulated following feedback from Council to ensure that it appropriately addresses the future alignment of public roads.
(e) to protect the amenity of adjoining development and land in terms of solar access to buildings and open space.	The proposed area of highbay warehouse has been designed and positioned to ensure that it does not overshadow any future development on adjoining properties or areas of open space. This is illustrated by the shadow diagrams submitted as part of the application.
Is compliance unreasonable or unnecessary in this instance?	
If compliance with maximum height provisions contained in Clause 4.3 were to be enforced, the proposal would not proceed. Having undertaken an extensive search for suitable sites, alternatives would need to be reconsidered including sites in other states. Given the importance of the proposed variation to the viability of the overall project it therefore seems unreasonable or unnecessary to enforce the maximum	

Test	Comment
	height limit when little external impact occurs as a result. The proposed variation will facilitate the operation of an industrial warehouse facility that will employ 200 people. It is therefore reasonable and necessary to support the proposed variation in order to achieve the objectives nominated for the IN1 General Industrial Zone for the benefit of Marsden Park, the Sydney Metropolitan Area and New South Wales more broadly.

Environmental planning grounds justifying the contravention of height

The following points summarise the planning merits associated with the proposed contravention of the height requirement:

- The proposed variation does not result in any overshadowing impacts that would affect the amenity or operation of current or future development on adjoining properties;
- The proposed highbay structure has been designed with a consistent colour and material selection to avoid emphasising the structure with excessive colour variation or material articulation. Visual impacts are thereby mitigated with this approach as evident in the submitted view analysis;
- The proposed highbay warehouse has been designed and positioned to ensure that it is integrated with the overall development. It is positioned central to the main warehouse structure so that the proposed height and scale cannot be read when standing adjacent to the building;
- While it will result in visual impacts for the current environment, such impacts are exaggerated while surrounding lands remain undeveloped. The visual impact would not be as significant if the locality was already an established industrial area. Therefore visual impacts are expected to become less exaggerated as the locality develops as is anticipated by the Growth Centres SEPP.
- The overall development has been designed to ensure that a high standard of built form and urban design is achieved. As the locality evolves over coming years, the proposal will be well suited in the context of surrounding development;
- The site is positioned well clear of Richmond Road and surrounding existing and future residential areas;
- Efficiencies generated by increasing the height of the proposed facility also benefit the environment by reducing the potential footprint of the building;
- IKEA will directly employ 200 staff to operate the facility. While this involves some consolidation from existing warehouse facilities, most positions will be new jobs created to service IKEA's growing online business;

Is the proposed variation in the public interest?

The proposal to construct a 34.7 metre high structure to

Test	Comment
	accommodate IKEA's operation is in the best interests of the public. The benefits in allowing IKEA to establish a localised, and purpose built facility will include: ▪ The employment of 200 people within an area defined to accommodate employment opportunities; ▪ The construction of appropriate facilities to establish and grow IKEA's online retailing capabilities; ▪ The construction of a localised MFLU to more efficiently service IKEA's growing retail network throughout Australia; ▪ The proposed variation does not result in any overshadowing impacts that would affect the amenity or operation of current or future development on adjoining properties; ▪ The proposed development is consistent with the public's expectations for development of the Marsden Park Industrial Area and more specifically the IN1 General Industrial Zone; ▪ The proposed variation is consistent with the objectives of Clause 4.3 in regard to height controls for development and certainly represents an example of applying Clause 4.6 to create flexibility where development standards seem unreasonable or unnecessary; ▪ While it will result in visual impacts for the current environment, such impacts are exaggerated while surrounding lands remain undeveloped.

5.0 Revised Mitigation Measures

The Environmental Impact Statement outlined a series mitigation measures to minimise or avoid impacts as required by the *Environmental Planning and Assessment Regulation 2000*. The following section proposed updated and revised mitigation measures as a result of the public exhibition process. The following points outline specific environmental management, mitigation and monitoring measures committed to by IKEA and Sydney Business Park to ensure that the project does not result in any unreasonable impacts.

Table 5.1: Revised Mitigation Measures

Item	Mitigation Measure
Construction Certificate	
<i>TransGrid</i>	The matters shall be addressed prior to the issue of the relevant Construction Certificate for different stages of the development: ▪ Fencing within the TransGrid Easement must not be installed until the fencing design has been assessed by TransGrid. An earthing study is required to determine appropriate fencing materials that can be utilised. Any fence erected within the easement, will need to be earthed and every second panel shall be isolated from the adjoining panel. ▪ Landscaping within the easement shall not exceed a mature growth height of three (3) metres ▪ An on-grade crushed road pavement surface shall be provided between the proposed concrete hardstand and the existing TransGrid stanchions to facilitate access from the site for TransGrid vehicles within the easement. ▪ A 12 metre wide sliding gate is required as part of boundary fencing adjacent to the northern stanchion to provide access for TransGrid maintenance vehicles. Details (materials) of this gate are to be confirmed following the finalisation of an earthing study. Transgrid are to be consulted in regard to its final design prior to installation.
<i>Landscaping</i>	An appropriately qualified consultant shall provide certification of selected landscape species (and their appropriateness) in the context of the proposed Bio-Retention basin located along the western boundary of the IKEA site.
<i>Dam Embankment</i>	A Dam Break Assessment shall be prepared and submitted to the certifier prior to the issue of the relevant Construction Certificate.
Construction Commencement	
<i>Construction Management</i>	A detailed Construction Management Plan shall be prepared in consultation with Transport for NSW and submitted to the certifier prior to the commencement of works on site. This plan will include the following information: ▪ Proposed hours of work, ▪ Contact details of FDC site manager; ▪ Traffic Management: - Ingress and egress of vehicles to site; - Management of loading and unloading materials; - Number and frequency of vehicles accessing the site;

Item	Mitigation Measure
	- Changes to on-street parking restrictions on local roads; - Management of construction traffic and car parking demand; - Management of existing vehicular and pedestrian movements around the site throughout various stages of construction; ▪ Major event coordination / management; ▪ Dust control measures; ▪ Construction waste management; ▪ Erosion and sediment control measures; ▪ Construction noise and vibration management; Any other relevant information relating to construction and its potential impact on the surrounding area;
<i>Transgrid</i>	▪ An Earthing Study to determine the most appropriate modified earthing design must be undertaken followed by the actual earthing modifications to be undertaken taking into account the findings of the earthing study. Transgrid requires a written undertaking that the developer will reimburse TransGrid for the costs associated with the earthing study and the actual earthing modification works, before construction works can commence. All earthing modifications must be undertaken before any work can commence within 30 metres of the TransGrid towers. Works outside a distance of 30 metres from TransGrid towers are unaffected by this condition. ▪ No mounds of earth or other materials shall be left on the easement during and after earthworks, even on a temporary basis, as doing so effectively creates a hazard by reducing the vertical clearances to the transmission lines. ▪ During construction, traffic control measures need to be implemented to prevent vehicles colliding with TransGrid's transmission towers. Any temporary fencing shall be earthed and every second panel isolated. ▪ Height restrictions must be applied to cranes, elevated work platforms plus any other plant and equipment proposed to operate on the easement. All mobile plant and equipment that is capable of exceeding a height of 4.2 metres is not permitted within the easement. ▪ All works must be carried out in accordance with the NSW WorkCover 'Work near Overhead Power Lines' Code of Practice 2006. Reference should also be made to the <i>TransGrid Easement Guidelines for Third Party Development</i> and contact TransGrid in the event of any uncertainty. ▪ Notification is to be provided to TransGrid prior to commencement.
Occupation Certificate	
<i>Road Access</i>	An Interim Occupation Certification shall not be issued until construction works associated with Road 5 are complete. A Final Occupation Certificate can only be issued following the dedication of Road 5 to Blacktown City Council.
<i>Basin B</i>	- An Interim Occupation Certificate shall not be issued until the stormwater detention function of Basin B has been constructed. This

Item		Mitigation Measure
<i>Construction</i>		does not include works associated with installing bio-retention functions of Basin B as proposed by Council.
<i>Basin B - Access</i>		A Final Occupation Certificate can only be issued following the registration of an interim right of way linking South Street to Basin B. This Right of Way is required to provide a legal right of access to Basin B until road widening occurs along South Street.
Workplace Travel Plan		A Workplace Travel Plan shall be prepared and submitted to the certifier prior to the issue of an Occupation Certificate.
<i>Section Certificate</i>	73	A Section 73 Compliance Certificate under the Sydney Water Act 1994 shall be obtained from Sydney Water. The Section 73 Compliance Certificate must be submitted to the Principal Certifying Authority prior to the issue of an Occupation Certificate.
Operational		
<i>Acoustic</i>		IKEA shall adopt the following protocol to minimise the potential for creating adverse noise impact at nearby residential receivers: The company shall ensure all delivery drivers and staff are aware of the importance of entering and departing the site with a minimum of noise. The following should be avoided: ▪ Excessive compression braking on approach to the site entry. ▪ Sounding horns. ▪ Signage should be installed on approach to the entry from both outside and inside the site clearly advising the proximity of residences and the need to minimize excessive noise. ▪ Drivers shall be directed to switch off engines during loading/unloading between 10.00pm and 7.00am. ▪ Night time activities, especially those involving forklift reversing beepers will be restricted to warehouse internal activities.

6.0 Conclusion

This Response to Submissions Report has been prepared on behalf of IKEA Distribution Services Australia Pty Ltd as proponent of State Significant Development Application SSD_6954. The application was lodged in March 2015 and involves the construction of a new Multi-Function Logistics Unit (MFLU) and associated estate infrastructure within the Sydney Business Park at Marsden Park.

This report responds to each of the matters raised by various government agencies, providing additional information, further justification, revisions to the proposed development or more detailed mitigation measures to satisfy concerns where possible.

The proposal is generally consistent with the relevant environmental planning instruments including strategic planning policy, State and local planning legislation, regulation and policies. The proposed variation in permitted height has been thoroughly examined as part of both the Environmental Impact Statement and this report. The proposed variation is considered acceptable for the following reasons:

- Minimal environmental impacts are anticipated. The automated high bay warehouse will not overshadow adjoining properties. Its simplistic design will mitigate distant visual impacts of the structure;
- The proposed automated racking system limits opportunities to express the built form through changes in shape, use of material or significant structural articulations; and
- Designs changes have been incorporated as part of the north and southern elevation of the standard height warehouse to improve the proposals presentation to the public domain.
- The proposed highbay warehouse is fundamental to the viability of the overall project. Should the impact of this proposal be considered unacceptable, IKEA Distribution Services Australia Pty Ltd will re-examine location options, including previously disregarded sites outside of New South Wales.

The proposed development represents the most viable and operationally efficient option with regard to fulfilling IKEA's needs for warehouse and distribution functions. It is positioned in an appropriately zoned area, intended to accommodate industrial activities of this kind. The proposal will contribute to the sustained economic growth of the NSW economy and provide a significant boost to the number of employment opportunities within the local and regional area. Both factors provide strong support for the development being carried out within the locality given the emphasis on growth and development of the North-West sector.

The proposed development should therefore be considered favourably by the Department of Planning and Environment and supported.

Appendix 1- Revised Architectural Plans

Appendix 2 – Revised IEA Civil Documentation

Appendix 3–Revised Estate Civil Documentation

Appendix 4 – Bushfire Protection Assessment

Appendix 5 – DA15/1088: Consent and Plans
