

14 March 2022

Minister for Planning
Department of Planning, Industry and Environment
12 Darcy Street
Parramatta NSW 2150

Attention: Chris Fraser

Dear Minister

SSD7348 MOD 10, OAKDALE WEST STAGE – S.4.55(1A) APPLICATION TO MODIFY ARCHITECTURE PLANS

I write on behalf of Goodman, the applicant to SSD7348 (Oakdale West Estate), to lodge an application under S.4.55(1A) of the Environmental Planning and Assessment Act 1979 (the Act).

S.4.55(1A) of the Act provides that:

- (a) *it is satisfied that the proposed modification is of minimal environmental impact, and*
- (b) *it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all)...*

As the consent authority for SSD7348, the Department of Planning, Industry and Environment (DPIE) are authorised to modify the consent provided the above is met. This is the **tenth (10)** modification to SSD7348 and seeks to:

- update the Concept plan to update Precinct 5 layout
- update Precinct 1 signage plans, including façade signage

This application includes:

Appendix A – Updated Masterplan and Lot 1A plans

1 Background

SSD 7348 was approved by the Department of Planning, Industry and Environment (DPIE) on **13 September 2021** for:

A Concept Proposal including:

- *concept layout of 22 warehouse buildings inclusive of dock offices and ancillary offices providing 476,000 square metres of gross lettable area, built over five development stages;*

AU02-11-7930.2 Goodman Group

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- concept layout of development lots, internal roads, drainage, landscaping, noise walls, basins and biodiversity offsets; and
- development controls

A Stage 1 Development including:

- bulk earthworks across all five stages including retaining walls and noise walls;
- lead in services including but not limited to drainage, power, sewer, water and telecommunications;
- service infrastructure to Precinct 1, including drainage, power, sewer, water and telecommunications;
- construction and operation of three warehouse buildings inclusive of dock offices and ancillary offices in Precinct 1 (1A, 1B and 1C) providing 118,000 square metres of gross lettable area;
- Western North-South Link Road and associated subdivision, basins and drainage;
- estate roads 1, 2 and 6 and eastern part of road 7;
- landscaping of Stage 1, the western boundary, Western North-South Link Road, estate roads 1, 2 and 6 and the eastern part of road 7, detention basins and the amenity lot
- subdivision of Stage 1 lots and road infrastructure including the services (substation) lot;
- stormwater drainage infrastructure for Lots 2A and 2B and all basins;
- temporary works to facilitate construction including but not limited to swales, haul road (construction access), landscaping and basins; and
- works including construction of traffic signals at Lenore Drive/Grady Crescent/WNSLR intersection.

There have been nine (9) subsequent Modifications to SSD7348.

The approved Lot 1A, 1B & 1C warehouse buildings are as follows:

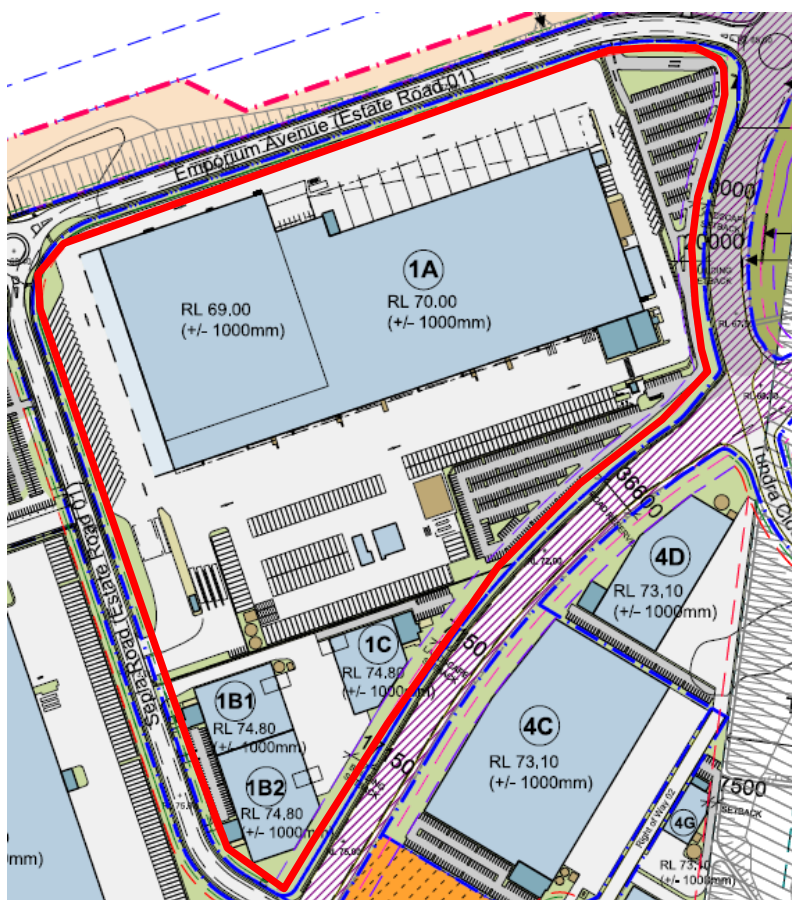


Figure 1 – Approved Lot 1A, 1B, 1C

2 Proposal Modification

This is the **tenth (10)** modification to SSD7348 and seeks:

- update the Concept plan to update Precinct 5 layout
- update Precinct 1 signage plans, including façade signage

It should be noted the proposed updates seek no change to approved:

- Use
- Building height, general footprint, Bulk and scale for Precinct 1
- Nominal update to GFA
- Landscaping
- Access arrangements and traffic generation

2.1 Architecture plan update

The following updates are proposed to the approved Masterplan and Lot 1A architecture plans:

2.1.1 Estate Masterplan (OAK MP 02) update

The following updates are proposed to the Masterplan:

- 1) GFA schedule updated:
 - Nominal increase in total warehouse GFA from 521,223sqm to 521,320sqm; and reduction in office GFA from 22,770sqm to 22,673sqm
 - This update results from minor GFA changes for Precincts 3,4,5 (subject to separate SSD / DA approvals).
 - This masterplan update is required to ensure consistency with recently approved for Warehouse 4E, and a proposed DA to Penrith Council for Warehouses 3C and Precinct 5.
 - Council requires OWE DA lodged to be consistent with the masterplan, hence the requirement to update the masterplan layout.
 - It is noted the total GFA for OWE remains unchanged.

Table 1 - GFA update Precinct 3,4,5

Precinct	Approved (MOD9) GFA (sqm)	Proposed (MOD10)GFA (sqm)
Precinct 1	125,198	125,198
Precinct 2	267,860	267,860
Precinct 3	54,460*	53,170
Precinct 4	115,952*	120,557
Precinct 5	35,640*	32,325
Amenities Lot	345	345
Total GFA	599,455	599,455

* Precincts shown in bold updated GFA since MOD 9.

This MOD10 proposal seeks to update the Estate masterplan to include correct GFA as per recent and proposed DA approvals for Precinct 3, 4 & 5.

It is noted that the environmental impacts for Precinct 3,4,5 are assessed and approved separately under these separate Building DA approvals, however it is noted that as the total GFA is proposed to remain as approved, there is only nominal additional resulting noise, traffic and air quality impacts proposed.

a) Precinct 3 GFA update

The proposed update to the Precinct 3 GFA results from the recently approved Building DAs for Lot 3A & 3B, while Lot 3C is proposed to be lodged imminently with Penrith Council for assessment. The relevant GFA for Precinct 3 are as follows:

Precinct 3	GFA (sqm)	DA / approval date
3A	11,000 total - 10,000 (warehouse) - 1,000 (office)	DA20/0843 / 15.04.21 (Penrith Council DA)
3B	21,500 total - 20,000 (warehouse) - 1,500 (office)	DA21/0440 / 25.11.21 (Penrith Council DA)
3C	20,670 total - 19,270 (warehouse) 1,400 (office)	DA lodgement with Penrith Council imminent
Total GFA	53,170	

b) Precinct 4 GFA update

The following GFAs apply to Precinct 4:

Precinct 4	GFA (sqm)	DA / approval date
4A	35,758	Subject to future DA approval
4B	12,873	Subject to future DA approval
4C	22,155	Subject to future DA approval
4D	6,922.65	Subject to future DA approval
4E	35,560 total - 34,000 (warehouse) - 1,560 (office)	SSD 22191322 / 29.10.21
4F & 4G	7,288.3	Subject to future DA approval
Total GFA	120,557	

c) Precinct 5 GFA update

The following GFA applies to Precinct 4:

Precinct 4	GFA (sqm)	DA / approval date
5A	27,185	Subject to future Penrith Council DA approval
5B	5,210	Subject to future Penrith Council DA approval
Total GFA	32,395	

SSD recently approved

2.1.2 Update to Precinct 5 layout

The update to Precinct 5, subject to Penrith Council DA approval, is as follows:

- Reduce the size of primary warehouse, shown as warehouse 5A in approved concept plan) and the addition of a new small warehouse (Warehouse 5A2).
- This layout update is to reflect customer demand.
- The update results in a reduced Precinct 5 car parking from 245 spaces to 137 spaces.
- The update results in a GFA reduction from 35,640sqm to 32,325sqm.
- It's noted Precinct 5 is subject to separate Penrith Council DA assessment, to be lodged imminently.
- The layout update is required to ensure consistency between the SSD7348 masterplan and development at Precinct 5

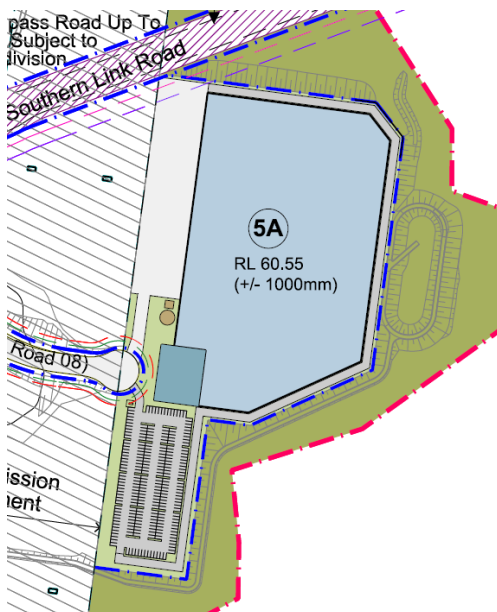
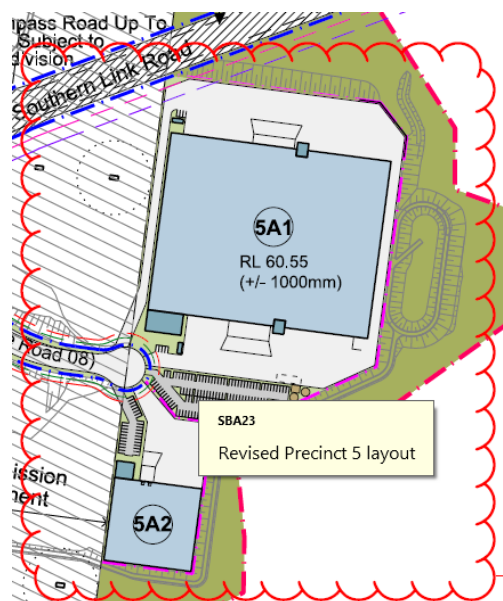


Figure 1 – approved Precinct 5 layout



proposed updated Precinct 5 layout

2.1.3 Signage Precinct 1 Plan (OAK MP 12) Update

The following updates made to the “Signage Precinct Plan”:

- 1) Pylon Sign (S1) sought for height increase from 16m to 16m height:
 - The proposed 16m height is considered more appropriately scaled considering the context, particularly the significant 36m adjacent Lot 1A warehouse.
 - The location of the S1 sign proposed to remain as approved.
 - The reason for the update is that the 16m sign would be too recessive considering the estate context.
- 2) Tenant façade signage “D” and “E” reduced in size as per customer request – refer **Fig.2**

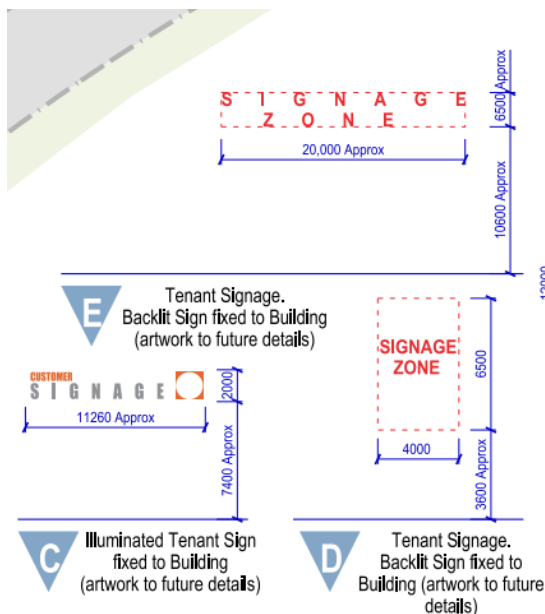
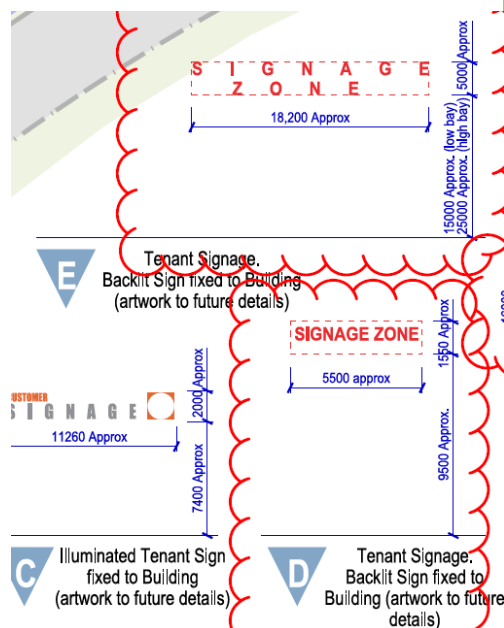


Figure 2 – Approved Sign D & E



Updated reduced Sign D & E

- 3) Sign "E" removed from south east corner office of warehouse 1A

2.1.4 Lot 1A – Façade plan updates

Façade plans for Warehouse 1A updated to show updated signage zones on the warehouse facade. The signage zones are primarily proposed to be reduced in size.

The reason for the update is to accommodate the customers signage requirements.

2.2 SSD7348 Appendix 2 (Plan Reference) Update

Appendix 2 is proposed to be updated as follows to account for proposed changes to the plans / plan references:

Table 2 - Updated plan reference

Architectural Plans prepared by SBA Architects			
Drawing	Title	Issue	Date
OAK MP 02	Estate Masterplan	B	3 February 2022
OAK MP 02	Signage Precinct 1 Plan	C	3 February 2022
OAK-1A-DA-14	Office Elevations – Building 1A	R	1 February 2022
OAK-1A-DA-15	Warehouse Elevations – Building 1A	S	1 February 2022
OAK-1A-DA-19	Skybridge Sections & Elevations – Building 1A	M	1 February 2022
OAK-1A-DA-29	Stage 2 - Elevations – Building 1A	M	1 February 2022

3 Environmental Impacts

Only minor changes are proposed to the approved plans, as demonstrated above with the comparison of approved vs. proposed drawings.

No changes are proposed to:

- Use
- Building Height, footprint, bulk and scale
- Car parking numbers
- Truck access, movements, and traffic intensity
- Landscaping

The updates will not result in a change to or intensification of use as the site. There will be no additional truck or car movements. For this reason, there is not anticipated to be any additional noise or air quality impacts resulting from the proposed updates.

3.1 Traffic Generation

The GFA for Precinct 5 is proposed to be reduced from 35,640sqm to 32,325sqm. The traffic generation for Precinct 5 is therefore anticipated to be reduced as per the below table. It should be noted a detailed traffic and parking assessment will be included with the Precinct 5 Building DA lodged with Penrith Council for assessment.

Table 3 - Precinct 3,4,5 trip generation

Precinct	Current approved (MOD9)			Proposed (MOD10)		
	GFA (sqm)	AM/PM	Daily	GFA (sqm)	AM/PM	Daily
Precinct 3	54,460	89	1,030	53,170	87	1,006
Precinct 4	115,952	189	2,194	120,557	197	2,280
Precinct 5	35,640	58	674	32,325	53	612

As demonstrated by the above table, as there is no change to the total GFA, there is no anticipated change to the trip / traffic generation resulting from the proposed update.

There is therefore no anticipated additional traffic impact resulting from the proposed update.

3.2 Visual impact

The only environmental impacts resulting from proposal are visual in nature. The updates are discussed below:

1) Pylon Signage (S1) Update

The approved 16m S1 estate entry pylon sign is proposed to be increased in height from 16m to 16m in height. This will ensure the signage is appropriately proportioned in the context of the adjacent 36m warehouse.

The proposed update is anticipated to have acceptable visual impacts compared to the approved S1 signage for the following reasons:

- S1 signage location remains unchanged, located on the corner of the Western North South Link Road and Estate Road 1;
- The width and depth of the S1 signage remains unchanged and as approved;
- While an additional 4m signage height is proposed, when viewed in the context of the adjacent 36m warehouse building the visual impact is considered appropriate. The signage will remain 20m below the height of the adjacent Lot 1A warehouse.

2) Warehouse façade signage updates - Lot 1A

The proposed façade updates are merely to reorganise the location and reduce dimensions of the approved façade signage.

This update is considered to have nominal visual impact noting there is no change proposed to the approved footprint, bulk, height and scale of the host Lot 1A, and that the general façade presentation and surrounding landscaping (which acts as a visual buffer from the site boundary) remains unchanged.

These changes will therefore only have minor visual impact when measured against the significant bulk and scale of the approved development. While no additional perception of bulk and scale will result, the proposed signage will continue to provide essential business identification and façade articulation.

Considering the significant expanse of the warehouse façade, the proposed signage dimensions are considered of proportionate and appropriate.

4 Statutory Provisions

The following provisions are relevant for MOD10:

4.1 Section 4.55(1A) of the Act

Section 4.55(1A) of the Act stipulates the following provisions:

A consent authority may, on application being made by the applicant or any other person entitled to act on a consent granted by the consent authority and subject to and in accordance with the regulations, modify the consent if:

(a) it is satisfied that the proposed modification is of minimal environmental impact, and

While the masterplan is proposed for update to reflect the Lot 5 layout, it is noted SSD7348 does not approve the Lot 5 buildings works, which is subject to separate Penrith Council DA approval. The Lot 5 update only result in minor GFA update and retains the approved height and car parking provision.

As described above, the proposed changes will result in only minimal additional visual impacts compared with that approved, with no change to bulk or scale of the warehouse built form. While the S1 sign is proposed to be enlarged from 16m to 16m in height, there is no change to the approved signage width or depth.

The proposed façade signage is updated but there is a minor reduction in signage dimensions.

Other than the minor visual impacts, there are no other resulting additional environmental impacts from proposed modifications such as:

- Traffic generation
- Acoustic impact
- Air quality impact

For this reason, the proposed modification is considered to have minimal environmental impacts.

(b) it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all), and...

The proposal is considered to remain substantially the same as the original consent as it retains the approved:

- Use, operation and hours of operation
- Building footprint
- Height, bulk and scale
- Façade treatment and general appearance
- Car parking numbers and arrangement
- Landscaping

Therefore, as most of the scheme will remain substantially the same as approved, it is considered to satisfy this requirement.

(c) it has notified the application in accordance with:

(i) the regulations, if the regulations so require, or

(ii) a development control plan, if the consent authority is a council that has made a development control plan that requires the notification or advertising of applications for modification of a development consent, and

Noted. Relevant notification to be undertaken.

(d) it has considered any submissions made concerning the proposed modification within any period prescribed by the regulations or provided by the development control plan, as the case may be.

Noted.

4.2 State Environmental Planning Policy (Industry and Employment) 2021 – Chapter 3 (Signage) Assessment

In respect of the update proposed to Oakdale West estate signage for Precinct 1, an assessment has been undertaken against Chapter 3 of State Environmental Planning Policy (Industry and Employment) 2021, as per Table.2.

Table 4 - State Environmental Planning Policy (Industry and Employment) 2021

Control	Proposed	Complies
Chapter 3		
<p>3.4 <i>Signage to which this Chapter applies</i></p> <p>(1) <i>This Chapter applies to all signage that—</i></p> <p>(a) <i>can be displayed with or without development consent under another environmental planning instrument that applies to the signage, and</i></p> <p>(b) <i>is visible from any public place or public reserve, except as provided by this Chapter.</i></p>	- Noted	
<p>3.6 <i>Granting of consent to signage</i></p> <p><i>A consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied—</i></p> <p>(a) <i>that the signage is consistent with the objectives of this Chapter as set out in section 3.1(1)(a), and</i></p> <p>(b) <i>that the signage the subject of the application satisfies the assessment criteria specified in Schedule 5.</i></p>	- Noted – see below.	Yes
<p>3.1 Aims, objectives etc</p> <p>(1) This Chapter aims—</p> <p>(a) <i>to ensure that signage (including advertising)—</i></p> <p>(i) <i>is compatible with the desired amenity and visual character of an area, and</i></p> <p>(ii) <i>provides effective communication in suitable locations, and</i></p> <p>(iii) <i>is of high quality design and finish, and</i></p>	<ul style="list-style-type: none"> - 3.1(1)(i) The site is an industrial area with buildings of a significant bulk and scale, including the host building (1A) having a height of 35m, length of 400m, and width of 140m and height. The proposed signage is therefore considered appropriately scales and compatible with the visual character and amenity of the industrial precinct. The signage will not detract from any view corridors. - (ii) The proposal provides appropriate building and business identification. To provide reduced signage dimensions would result in the signage being inappropriately recessive against the host building. - (iii) The signage will be installed to Goodman's usual best in class standards. It will be securely affixed and incorporate appropriate illumination consistent with Goodman assets throughout NSW, particularly Oakdale Central and South Estates. 	Yes
Schedule 5		
1 Character of area		

<ul style="list-style-type: none"> - <i>Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located?</i> 	<ul style="list-style-type: none"> - Yes, the proposed signage is within an industrial precinct which includes a number of facilities, all of which have individual Building and Business Identification Signage. - The proposed signage strategy is of a style and design reflecting that consistent with existing Goodman building identification signage within the Estate and approved for other Goodman estates including nearby Oakdale Central, East and West Estates. 	
<ul style="list-style-type: none"> - <i>Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?</i> 	<ul style="list-style-type: none"> - Yes, the proposed signage forms a coherent signage strategy, consistent in both design and style with that of existing signage within the Estate. 	
2 Special areas		
<ul style="list-style-type: none"> - <i>Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas?</i> 	<ul style="list-style-type: none"> - The proposal does not detract from the amenity or visual quality of any environmentally sensitive areas, natural or other conservation areas, open space area, waterways or rural landscapes. The signage is within the industrial precinct, considered of low environmental sensitivity. - The proposed signage will not adversely impede the visibility of other signage within the surrounding area. 	Yes
3 Views and vistas		
<ul style="list-style-type: none"> - <i>Does the proposal obscure or compromise important views?</i> - <i>Does the proposal contribute to the visual interest of the streetscape, setting or landscape?</i> - <i>Does the proposal reduce clutter by rationalising and simplifying existing advertising?</i> - <i>Does the proposal screen unsightliness?</i> - <i>Does the proposal protrude above buildings, structures or tree canopies in the area or locality?</i> - <i>Does the proposal require ongoing vegetation management?</i> 	<ul style="list-style-type: none"> - The signage will not obscure or compromise views, or impede on the viewing rights of other advertisers. - Sign "S1" is the singular entrance pylon sign at the entrance of the estate. There is therefore no visual clutter. - This estate signage is important to demarcate the entry to this prominent industrial precinct, and is therefore important for wayfinding. - Sign "S1" at 16m does not protrude above the 35m building height of the adjacent host Warehouse 1A. The building signage is also located on the warehouse façade and does not therefore protrude above the building height. - No ongoing vegetation management will be required for the sign. 	Yes
4 Streetscape, setting or landscape		
<ul style="list-style-type: none"> - <i>Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located?</i> - <i>Does the proposal respect important</i> 	<ul style="list-style-type: none"> - The proposed signage is compatible with the scale of the surrounding streetscape, setting, and large scale warehouse buildings of Oakdale West. - The proposed signage will incorporate quality materials and finishes and provide a 	Yes

features of the site or building, or both?	coherent and integrated colour scheme to that of all Goodman signage.	
5 Site and building		
<ul style="list-style-type: none"> - Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located? - Does the proposal respect important features of the site or building, or both? - Does the proposal show innovation and imagination in its relationship to the site or building, or both? 	<ul style="list-style-type: none"> - As above, given the precinct consists of numerous warehouses of significant bulk and scale, the proposed signage is considered appropriately scaled to respond to the environment. - The 'S1' signage is considered to provide an important entry signage for wayfinding and to introduce tenants and visitors to the Oakdale West Estate. 	Yes
6 Associated devices and logos with advertised and advertising structures		
<ul style="list-style-type: none"> - Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed? 	<ul style="list-style-type: none"> - The signage is designed with all required safety measures in place and will be adequately secured. 	Yes
7 Illumination		
<ul style="list-style-type: none"> - Would illumination result in unacceptable glare? - Would illumination affect safety for pedestrians, vehicles or aircraft, or detract from the amenity of any residence or other form of accommodation? - Can the intensity of the illumination be adjusted, if necessary? - Is the illumination subject to a curfew? 	<ul style="list-style-type: none"> - Illumination will occur at low wattage and will not impact the safety or amenity of pedestrians, vehicles or nearby residential accommodation. - The light source for the signage will be static and it will only be the lettering and Goodman square logo, which is a small portion of the sign. - The illumination will be as per the illumination implemented in all Goodman signage across Australia and NSW, which has been tested to be of optimum illumination without producing unacceptable glare. 	Yes
8 Safety		
<ul style="list-style-type: none"> - Would the proposal reduce the safety for any public road? - Would the proposal reduce the safety for pedestrians or bicyclists? - Would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas? 	<ul style="list-style-type: none"> - The proposed signage will not distract motorists. - No safety implications for pedestrians or vehicular users are envisaged. 	Yes

From the above assessment, the proposed signage is considered appropriated scaled and designed to respond to the environment and the host warehouse buildings.

5 Consultation

A pre-DA meeting was held with Penrith Council in the first week of March 2022. At this meeting Council discussed their concern with the proposed pedestrian crossing from the car park to the Lot 5A-1 building. A solution was discussed which included a boom gate and traffic light system at this crossover to remove any safety concern involving a potential conflict with pedestrians and truck movements at this facility.

This boom gate at light system will ensure the 'red light' and boom gate prevents any truck movements if pedestrian are crossing at this location. Detail of this safety system will be included in the Penrith Council DA for Council review and approval as the relevant consent authority.

6 Conclusion

Pursuant to Section 4.55(1A) of the Environmental Planning and Assessment Act 1979 (the Act), we hereby seek the Department of Planning, Environment and Industry to modify the consent to the minor updates proposed in this MOD 10 application as applies to concept plan layout for Precinct 5 and Warehouses 1A signage updates.

Yours sincerely

A handwritten signature in black ink, appearing to read "Guy Smith", is positioned above the typed name.

Guy Smith
Planning Manager