

20 November 2017

Chris Ritchie
Director
Industry Assessments
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Chris,

RE: SSD 8209 – Oakdale South Stage 4 - Costco Wholesale, Site 4A Oakdale South.

An Environmental Impact Statement (EIS) and supporting documentation was submitted on 16 August 2017 to the New South Wales Department of Planning and Environment (DP&E) on behalf of Goodman in support of a state significant development application (SSDA) for the development of Site 4A within the Oakdale South Estate (OSE).

The proposal is for the construction, fit-out and use of a warehouse and distribution facility to be used for the storage and distribution of goods for Costco Wholesale. The application package was placed on public exhibition from 31 August 2017 until 16 October 2017. Following the close of the public exhibition period, the DPE requested that the proponent, Goodman Property Services (Aust) Pty Ltd (Goodman), provide a formal response to the submissions received during the exhibition period.

This letter provides a formal response to the matters raised in the submissions.

1.0 Notification and Submissions

The SSDA was formally notified to adjoining landowners and key local and state authorities and agencies who were formally invited to make comment on the SSDA. In total 10 agency submissions and 1 public submissions were received.

The Department of Planning has also provided key issues to be addressed in the response to submissions in its letter dated 25 October 2017.

A detailed response to the comments provided by the DP&E and within the various agency submissions are provided in **Table 1**.

Please do not hesitate to contact Jeremy on his mobile 0438 398 079 or jeremy@hawesandswan.com.au should you have any queries in relation to this matter

Yours sincerely

A handwritten signature in dark ink, appearing to read 'J.D. Swan'. The signature is written in a cursive, slightly slanted style.

Jeremy Swan
Director

Table 1 – Response to Submissions

Matters Raised	Applicant consideration of matter/response																								
Department of Planning																									
<u>Traffic</u> Please provide revised traffic generation tables which list the predicted traffic volumes for all development lots in the Oakdale South Industrial Estate as individual rows.	<u>Comment</u> – Ason Group have advised that traffic generation is consistent with the volumes produced in the TIA, and has not been updated since SSD submission. For clarity, the operational tables are reproduced below. Table 1: 2017 Oakdale South Estate Peak Hour Traffic Generation <table><tr><th>Precinct</th><th>Masterplan (vph)</th><th>MOD 4 (vph)</th><th>Proposed (vph)</th></tr><tr><td>1</td><td>171</td><td>152</td><td>152</td></tr><tr><td>4</td><td>79</td><td>58</td><td>96</td></tr><tr><td>5</td><td>137</td><td>49</td><td>49</td></tr><tr><td>2,3 & 6</td><td>258</td><td>291</td><td>291</td></tr><tr><td>Total</td><td>645</td><td>550</td><td>588</td></tr></table>	Precinct	Masterplan (vph)	MOD 4 (vph)	Proposed (vph)	1	171	152	152	4	79	58	96	5	137	49	49	2,3 & 6	258	291	291	Total	645	550	588
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<u>Construction Staging and Timing</u> Please provide an estimate of the total timeframe of the development, including the estimated timeframe for stage 1 and stage 2.	<u>Comment</u> –The site pad, estate roads, and servicing are almost complete with Practical Completion expected around end of November 2017. It is estimated that works for Stage 1 will commence soon after obtaining development consent with Stage 2 to commence in approximately 5 years.																								

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<u>Stormwater Management</u> - Please confirm the height of the water tanks and pump room fronting estate road 1. <u>Landscaping and Visual</u> - As noted by Penrith City Council, buffer landscaping treatments depicted in the landscaping plans are inconsistent with the landscaping approved under SSD 6917. Please provide landscape plans demonstrating consistency with the SSD 6917 landscape works. - Please provide a visual assessment of the water tanks and pump room when viewed from estate road 1 with landscaping that can be reasonably expected upon planting.	<u>Comment</u> – Group GSA have confirmed both water tanks are 4.76 metres high with a 12 metre diameter. The Pump Room is 3.4 metres high. <u>Comment</u> – Group GSA have revised the landscape plans to demonstrate consistency with the SSD 6917 landscape works. Refer to attached revised Landscape Drawings L-1000, L-1000.1, L-1101, L-1102.1, L-1102, L-1111 and L-4001 <u>Comment</u> – Group GSA advised that the perspectives provided with the SSD submission were created capturing the site entrance/arrival area including the water tank locations (Refer to Architectural Drawing DA8300, Appendix A). This perspective is an accurate representation of landscape species as proposed in Landscape documentation at year 5. An additional perspective (refer to Appendix B) has been prepared to provide a visual assessment of the water tanks and pump when viewed from estate road 1 with landscaping that can be reasonably expected upon planting. Below are the reasons why we believe the visual impact of the water tanks and pump room are acceptable: - The water tanks are 4.76m and the pump room is 3.4m are low in height which ensures that these structures will have a neutral impact on when viewed from estate road 1, noting this is a cul de sac. - The landscaping provided upon planting is dense.

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<u>Waste</u> Please confirm the source and composition of the quarantine waste stream detailed in the waste management plan.	- The pump room is located between the water tanks resulting in a reduction in the visual impact of the pump room from Estate Road 1. - The water tanks are appropriately setback from Estate Road 1 providing an appropriate setback to screen them with landscaping. <u>Comment</u> – Quarantine waste generated on site comprises primarily of foodstuffs that have been opened during inspections of inbound product. Inspections are typically undertaken for wooden pallets that have unclear providence. The contractor, Remondis, have collected limited quantities (7 x 1.5m³ quarantine waste bins) over the past year.
Penrith City Council	
<u>Noise Management</u> The Noise Report, prepared by SLR, dated 14 June 2017, indicates that the sensitive receivers located at Jacfin & Capitol Hill may be impacted by construction noise. It notes that construction may occur prior to residential development occurring. However, mitigation measures proposed in the circumstance that residential occupation has occurred prior to construction commencing is inadequate to address this potential.	<u>Comment</u> – A Construction Noise Management Plan (CNMP) will be prepared for the development prior to the commencement of construction works, in accordance with the <i>Interim Construction Noise Guideline</i> (ICNG). This would provide specific noise mitigation measures to minimise impacts on all potentially affected sensitive receivers.

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<u>State Environmental Planning Policy No.33 – Hazardous and Offensive Development</u> SSD6917 includes conditions E53 & E54 limiting the storage of dangerous goods below the thresholds outlined in SEPP 33. The report prepared by Core Engineering Group concludes that <i>“SEPP33 does not apply to the proposed facility and no additional planning risk studies are required for the development.”</i> The report does not sufficiently explain why the SEPP does not apply. The report states on page 2 that <i>class PHI materials will not be stored at the facility</i> (assuming the reference should state PGI materials). Table 3-1 on page 5 indicates that the facility will store < 1 tonne of PGI class 3 flammable liquids. Clarification, however, is required as whether the facility is, or is not, storing PGI class 3 flammable liquids.	<u>Comment</u> – Core Engineering have advised that the statement <i>“note: Class 3 PHI materials will not be stored at the facility”</i> is an error. To provide flexibility within the facility there has been allowance for the storage of Class 3 PG I materials; however, in practice, these materials are unlikely to be stored. As there is the allowance to store these products, they have been included within the assessment as documented in Table 3-2 and Table 3-3. No more than 1 tonne of class 3 product will be stored at the site therefore SEPP 33 would continue to not apply to the site In response to <i>“The report does not sufficiently explain why the SEPP does not apply.”</i> The conclusion of the report states: <i>“A review of the quantities of DGs stored at the proposed Costco Warehouse was conducted and compared to the threshold quantities outlined in Applying SEPP 33. The results of this analysis indicates that the threshold quantities for the DGs to be stored are not exceeded; hence, SEPP 33 does not apply to the project.</i> <i>As the facility is not classified as potentially hazardous, it is not necessary to prepare a PHA study to fully assess the potentially hazardous nature of the facility as a result of it not being SEPP 33 applicable.</i> <i>Furthermore, the impact of transporting DGs as a result of DG storage was reviewed with reference to the SEPP 33 thresholds for transport. The review indicated that the quantities being transported would be below the minimum</i>

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<u>Land Contamination</u> A preliminary and stage 2 detailed investigation of contamination on the site was carried out as part of the Oakdale South Industrial Estate Concept Proposal and Stage 1 SSDA6917. The conclusion of the previous investigations deemed the site suitable for commercial/industrial land use. As such no further investigation is required and SEPP 55 is not triggered within this assessment. However, Council notes that the EIS did not mention development consent requirements for remediation should contamination be identified.	<i>transport loads as this would indicate extremely high turnover of product within the warehouse. Therefore, it was concluded that the transport limits were not exceeded and that no further transport incident management would be required. It is further noted that the appropriate incident response would be managed by the transporter as required by the ADG Code."</i> As SEPP 33 is solely a threshold based assessment, the report and conclusion demonstrate the thresholds are not exceeded; hence, SEPP 33 does not apply. Table 3-1 states <100,000 kg (100 tonnes) of PG I materials may be stored which is below the threshold of 600,000 kg (based on distance to the site boundary) as documented in Table 3-2. <u>Comment</u> – It is noted in both SSD 7719 for Sigma and SSD 7763 for Toyota (recent approvals within Oakdale South) the following condition was imposed, which we would expect to be imposed on the subject application: <i>"The Applicant must implement the Unexpected Finds Protocol, Oakdale South Estate, prepared by Aecom Australia Pty Ltd dated 9 September 2016 for the broader Oakdale South Industrial Estate (SSD 6917) to ensure that potentially contaminated material is appropriately managed. Any material identified as contaminated must be disposed off-site, with the disposal location and results of testing submitted to the Certifying Authority, prior to its removal from the site."</i>

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<u>Stormwater Management</u> - The size and type of GPTs proposed has not been included on the Civil Works Plans or other documentation. The MUSIC modeling relied on for the entire OSE specified the on-lot GPTs as Rocla CDS type-units. Prior to Construction Certificate the proponent is to confirm the size and type of GPTs. If a substitute for the CDS-type GPTs is proposed the MUSIC modeling must be redone and resubmitted to ensure the overall water quality targets are not compromised. - An Operation and Maintenance Plan must be prepared for all on-lot stormwater treatment measures prior to Construction Certificate. This should include details on the inspection frequency and cleaning/maintenance requirements of the proposed treatment measures, checklists, as well as detail on how this will be managed (nominate who will be responsible). The water balance and demand analysis in the Water Management Plan was only undertaken for Stage 1 of the development. As this application is for both Stage 1 and Stage 2, the water demand analysis must be resubmitted to <u>include Stage 2</u> requirements, so that appropriate water conservation and reuse is applied to the whole development. - There is a discrepancy between the Water Management Plan and the Sustainability Management Plan regarding the sizing of the rainwater tanks proposed. The Sustainability Management Plan drastically underestimates the size of rainwater tanks required (i.e. only 50KL for	<u>Comment</u> – ACOR Engineering have advised that the type and sizing of the GPT units will be confirmed during preparation of the construction certificate documents. Rocla CDS type units are proposed. An operation and maintenance plan can be prepared before issue of the Occupation Certificate. This is ordinarily completed following completion of construction so that photos of the devices and as-built drawings can be included in the operation and maintenance plan. It is therefore proposed a condition requiring this plan to be prepared prior to Occupation Certificate. An updated water management plan and drawings is attached which indicates the water conservation and reuse for both Stages 1 and 2. (Appendix C) Comment – Sustainability Management Plan has been updated to be consistent with the Water Management Plan (Appendix D)

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the entire 14.27 ha site). The 450KL rainwater tanks for Stage 1 as proposed by the Water Management Plan is consistent with the requirements of the DCP 2014 for water reuse and conservation in an industrial development. - Drawing DAC2.06 is missing from the online Civil Works Plans package. <u>Landscaping</u> - The site adjoins rural-residential lands. The perimeter landscaping along the eastern boundary is inadequate and inconsistent with the previously approved landscape concept plan. - Swale planting is to include trees to screen retaining walls and reduce the scale of the builtform. - Additional and more effective screening plants are required to screen retaining walls, so their surface is screened 90%. - The substation should be relocated to a less visually intrusive location away from pedestrian routes and entrances.	This drawing is included at Appendix C. <u>Comment</u> – The landscape plans have been amended to demonstrate consistency with the previously approved landscape concept plan. It should be noted the eastern boundary estate perimeter planting is included under Oakdale South concept approval, SSD6917. Refer to revised Landscape Drawings L-1000, L-1000.1, L-1101, L-1102.1, L-1102, L-1111 and L-4001 attached <u>Comment</u> – The swale planting to the eastern boundary is approved under the Oakdale South concept approval, SSD6917, and not included within the Costco SSD. <u>Comment</u> – Planting has been increased to create a more effective screen to the retaining walls so that wall surface will be screened with climbers in the future. (Refer to revised Landscape Plans, Appendix E) <u>Comment</u> – The electricity supply authority requires all kiosk substations to be accessed directly off the road in a dedicated site easement defined by Title Deed off the public boundary. It is therefore required to be located along the street frontage. It should however be noted that as it is proposed to be located towards

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• Landscape cross-sections should be provided to understand the changes in the levels. • Perspectives should be provided from key locations, including from the rural- residential lands to the east, that accurately indicate the proposed landscaping. • No footpath is provided through certain sections of the car park. To ensure pedestrian safety, the footpath should be provided along the entire length. • Fencing details should be provided. Fences should be setback approximately 2m from the front boundary. • The northern boundary has an interface with open space riparian corridor. A greater diversity of tree species including larger tree species in the planting mix shall be provided.	the end of Estate Rd 01, its visibility is limited. Additional landscape screening is not feasible as the supply authority as strict setback requirements for vegetation. <u>Comment</u> – Landscape Cross sections cut through the south-east corner have been added to L-4001 to highlight the changes in the levels (Appendix E) <u>Comment</u> – We believe additional perspectives are not required since boundary treatments remains consistent with that approved under MOD1 SSD6917. It should be noted that Visual Impact Assessment, approved under MOD1 of SSD6917, took into account the visual impact of the proposed Lot 4 building from various key vantage points, including from the rural residential land to the east. A supplementary section has shown on Landscape Drawing L-4001 attached assist in illustrating the relationships between levels, acoustic wall, retaining wall and Costco vehicular concourse <u>Comment</u> – Costco propose a one metre wide zebra line marked path along the length of the carpark in the north-south axis to address any concerns of safety within this staff carpark <u>Comment</u> – Refer to attached updated supplementary landscape plans (Appendix E) which includes fence details on L-4001. The fence needs to be on the front/street boundary to demarcate the estate and on-lot landscape areas, which is subject to different maintenance regimes. <u>Comment</u> – the plans have been updated (Appendix E) to includes greater mix of plant species and demonstrate greater consistency with plant selection in the approved SSD6917 landscape concept plan

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• The landscaping should be amended to include shrubs. Fast growing shrubs (i.e. Wattles) should be considered to provide screening in the medium term while other landscaping is being established. • Insufficient landscaping is provided to the western end of the retaining wall located between the carparks. • Street trees are to be provided in accordance with the approved street tree masterplan (including layout and other materials). • The hard stand area to the west of the building appears excessive. This area should be reduced to allow for greater landscaping between the car park areas.	<u>Comment</u> – The landscape plan has been updated (Appendix E) the visual impact of the proposed retaining wall is significantly less intrusive than if the warehouse to be located close to the boundary. The retaining wall, with the proposed landscaping treatment presents well to the Estate Road 1. It should also be noted that as the exposure of this portion of Estate Rd 1 will be limited as is towards the end of the road / cul de sac.] <u>Comment</u> – the landscape plans have been updated (Appendix E) to ensure that proposed street trees reflect that approved under SSD6917 landscape masterplan. Note however Costco SSD scope of works apply to on-lot landscaping, not estate masterplan landscaping. <u>Comment</u> – The size of the hardstand area is a Costco operational requirement, as advised by the Traffic Engineer to enable adequate manoeuvrability for B-Double Trucks – this facility is a distribution depot. If the vehicular concourse area in front of the building or behind the building was any smaller, it would not comply with code requirements for vehicular movements. It should be noted that the proposed building footprint and hardstand layout is consistent with that approved under the SSD6917 concept approval.



Hawes & Swan
Town Planning Consultants

Matters Raised	Applicant consideration of matter/response
Roads & Maritime Services	
Roads and Maritime has reviewed the submitted application and raises no objection to the Application, provided the proposed development is consistent with the approved Oakdale South Estate Concept Plan	<u>Comment</u> – Noted, the proposed development is consistent with the approved Oakdale South Estate Concept Plan, SSD6917
Transport for NSW	
TfNSW has reviewed the associated documents and provides no comment to the subject application.	<u>Comment</u> - Noted
Water NSW	
WaterNSW notes that the location of the proposed warehouse and distribution facility (Lot 4A) is in the southern portion of the Oakdale South Estate (OSE), and therefore not directly adjacent to the Warragamba Pipelines corridor.	<u>Comment</u> – Noted

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• However, the works have the potential to impact on downstream properties through the alteration of flood behaviour of Ropes Creek, including any realignment or works carried out on Ropes Creek and associated tributaries. WaterNSW requires upstream development to not result in an increase in current stormwater levels that currently enter the Warragamba Pipeline corridor. • It is noted stormwater is to be collected and directed to the underground stormwater system, where it is conveyed to the north-western corner of the site before being treated by a GPT and discharged to bio-detention basin "E". It is understood from WaterNSW's response to SSD 6917 MOD1 for the overall Oakdale South Estate, this will result in post-development flows remaining the same, or less than existing pre-development flows, and peak stormwater flows downstream of the site will not be increased as a result of the proposal. This is supported by WaterNSW with no further comment on the application. • WaterNSW requests that the Department continues to consult with us regarding any future developments for the greater Oakdale Estate.	
EPA	
• On the basis of the information provided, the proposal does not constitute a Scheduled Activity under Schedule 1 of the <i>Protection of the Environment Operations Act 1997</i> (POEO Act). However, if future tenancies of the new building constitute a Schedule Activity under Section 1 of the POEO Act, these premises will require an Environment Protection Licence to be issued.	<u>Comment</u> - Noted

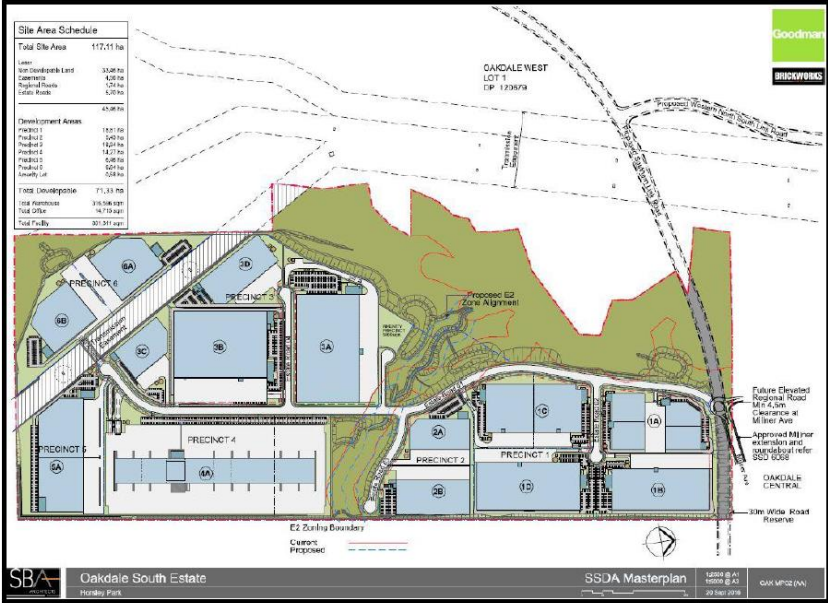
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The EPA has no further comments regarding the proposal at this time.	
Rural Fire Service	
- The New South Wales Rural Fire Service (NSW RFS) provides the following recommended conditions: Asset Protection Zones <i>The intent of measures is to provide sufficient space for firefighters and other emergency services personnel, ensuring radiant heat levels permit operations under critical conditions of radiant heat, smoke and embers, while supporting or evacuating occupants.</i> - At the commencement of building works, and in perpetuity, the entire site shall be managed as an Inner Protection Area (IPA) as outlined within section 4.1.3 and Appendix 5 of <i>Planning for Bush Fire Protection 2006</i> and the NSW Rural Fire Service's document <i>Standards for asset protection zones</i>. Water and Utilities <i>The intent of measures is to provide adequate services of water for the protection of buildings during and after the passage of a bush fire, and to locate gas and electricity so as not to contribute to the risk of fire to a building.</i> - Water, electricity and gas are to comply with section 4.1.3 of <i>Planning</i>	<u>Comment</u> – Noted. The Landscape Design of the site has been reviewed and approved by bushfire consultants, ABPP and complies with the principles of Appendix 5 of <i>Planning for Bush Fire Protection 2006</i>. Refer to ABPP correspondence confirming compliance attached

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<i>for Bush Fire Protection 2006.</i> Access <i>The intent of measures for public roads is to provide safe operational access to structures and water supply for emergency services, while residents are seeking to evacuate from an area.</i> 3. Public Road Access shall comply with section 4.1.3 (1) of <i>Planning for Bush Fire Protection 2006</i>. Design and Construction <i>The intent of the measures is to reduce the risk of ignition of a building from a bush fire while the fire front passes.</i> 4. New construction of the northern, eastern and western elevation(s) and roof of Warehouse 4A shall comply with section 3 and section 6 (BAL 19) Australian Standard AS3959-2009 <i>Construction of buildings in bush fire-prone area</i> or NASH Standard (1.7.14 updated) <i>National Standard Steel Framed Construction in Bushfire Areas - 2014</i> as	<u>Comment</u> – NDY have reviewed condition 2 (Attachment F) and have advised that Section 4.1.3 of Planning for Bushfire Protection relates specifically to Residential subdivisions, hence is not applicable to this development. Regardless, the design shall meet the intent of this section as follows: - The building is protected by hydrants and sprinklers with on site tanks - Electrical reticulation from the substation to the Main Switch Room will be underground. - The development will not use bottled gas storage, will use metal piping, and will not use polymer sheathed flexible gas supply lines to gas meters. <u>Comment</u> – Noted, and able to comply <u>Comment</u> – Noted, and able to comply

[illegible]

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<u>Wastewater</u> The proposed development is located within the St Mary's catchment. Sydney Water has the capacity to service the development. The applicant is required to prepare a scheme plan and provide it to Sydney Water.	<u>Comment</u> – ACOR Engineering note this will be documented prior to issue of the Construction Certificate
Fire & Rescue NSW	
- We note that the preliminary hazard analysis, undertaken by <i>CORE Engineering Group</i> (8 August 2017), for the subject development states that the proposed development is not deemed hazardous development as defined in State Environmental Planning Policy 33 (SEPP33). - Notwithstanding, due to the proposed volume of storage of dangerous goods of Classes 2, 3, 4, 5, 6 and 8 at the site and having regard for FRNSW statutory responsibilities regarding emergency fire and hazardous material incidents (i.e. Sections 6 and 10a of the <i>Fire Brigades Act 1989</i>). It is FRNSW opinion that Clause E1.10 of the National Construction Code (NCC) of Australia is applicable to the proposed development. Clause E1.10 requires that additional provision must be made if special problems of firefighting could arise	<u>Comment</u> – Noted. The design of the fire hydrant system will be developed in consultation with FRNSW as a stakeholder during the fire engineering brief process.

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because of the nature or quantity of materials stored in a building or on the allotment. - Regarding Clause E1.10 we consider that the design, extent and configuration of the fire hydrant system for this site should be developed on site specific assessment basis rather than sole reference to Australian Standard (AS) 2419.1 - 2005 <i>"Fire Hydrant System Design, Installation and Commissioning"</i>. Of particular interest to FRNSW is the minimum fire flow rate that the fire hydrant system will be capable of providing. <u>Recommendation</u> - Should a fire or hazardous material incident occur at the subject site, it is vital that FRNSW personnel have ready access to an on-site fire hydrant system with a suitable fire water flow rate. Should development consent be granted, FRNSW recommends that the Department consider including the following recommendation as a condition attached to the relevant instrument of development consent: - With respect to the project's fire hydrant system and Clause E1.10 of the National Construction Code of Australia, that the fire hydrant system's design configuration and minimum fire flow rate is developed in consultation with and to the satisfaction of Fire & Rescue NSW.	

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TransGrid	
- As you are aware, TransGrid operates and maintains the NSW high voltage transmission line network. After review of the subject parcel of land, TransGrid can confirm the development site is impacted by the following TransGrid infrastructure and easement: Sydney South – Sydney West No 1 330KV transmission line (feeder 30, structure span 10-13) - In the interest of public safety, the design and placement of any proposed development should ‘prudently avoid’ TransGrid easements and infrastructure. Any development to be located near high voltage transmission lines must be thoroughly assessed by TransGrid and this process takes considerable time. A review of the final design of the proposed development must be undertaken by our engineers. - As preliminary advice please see a copy of <i>TransGrid’s Easement Guidelines for Third Party development (V10)</i> above. These guidelines are not an exhaustive list and should there be any uncertainty further consultation with TransGrid is required. <u>Can you please request from the developer</u> - Is the developer proposing to change the existing ground level within our transmission line easement? If yes then we will require a <u>3D DXF</u>	<u>Comment</u> – As Costco is in Precinct 4, which is removed from the TransGrid easement, the comments below are not considered relevant. Below is an extract from Figure 2 of the EIS lodged with this application that is a copy of the Modified OSE Concept Approval. As noted the transmission easement is located at the end of Estate Road one and adjacent to Precinct 5 and not Precinct 4 the subject of this application.  Figure 2 – Modified OSE Concept Approval (Source SBA Architects)

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<u>plan</u> to check the vertical and horizontal clearances of the new proposed finish ground level. We refer to drawing (DAC1.01 – Issue A), this plan refers to a carpark. However, the plan isn't clear if it will be encroaching into our easement corridor? If yes then a <u>3D DXF plan</u> will be required. TransGrid will also need to assess the small access road connecting onto the roundabout, as this will be encroaching into our easement. Is this part of this SSD or has it been previously approved in a prior determination. 2. Please also advise of any other proposed activity either within TransGrid's easement and/or immediately adjacent too. For example is there any pipes and/or cables proposed to encroach into TransGrid's Easement corridor?	The parking referred to concerns Precinct 5, not Precinct 4, and is therefore not relevant to the Costco SSD.
Jacfin Pty Ltd	
<u>Allens Letter</u> <u>Noise Criteria</u> Condition B18 of the Stage 1 Development Consent for OSE (SSD 6917) (Stage 1 Consent) imposes an operational night time noise limit of 48dBA at all 'L3' receivers, including the Jacfin Land. The night time noise criteria	<u>Comment</u> – SLR have advised the noise impact assessment conducted for the development considers the worst-case peak operations for each period with the applicable weather conditions, including concurrent peak vehicle movements

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applicable to the OSE is designed to prevent sleep disturbance as a result of noise. The Costco DA does not seek to alter the noise criteria applicable to the proposed development under the Stage 1 Consent. The Noise Report concludes that the night time operational noise level of the proposed development in adverse weather at the Jacfin Land will be 48dBA. The noise impact of the proposed development is therefore at the limit of the maximum noise level permitted under the Stage 1 Consent, under adverse weather conditions. Accordingly, there is no room for error in relation to the noise levels calculated by SLR. Even small variations in the assumptions adopted by SLR in undertaking the modelling presented in the Noise Report have the potential to result in an exceedance of the applicable noise criteria and unacceptable impacts on surrounding receivers. In the circumstances, the discrepancies and issues identified by Wilkinson Murray (discussed further below) are significant and indicate that the proposed development is likely to have an unacceptable noise impact on the Jacfin Land.	across all precincts of the OSE and all mechanical plant operating at 100% capacity continually throughout all periods. As such, the assessment is considered worst-case and conservative in its predictions. It is further noted that the EPA guidance outlined in the NSW <i>Industrial Noise Policy</i> (INP) nominates this criteria as a screening level (and not a 'limit'). Where an exceedance is indicated, this indicates the requirements for a detailed maximum noise level event assessment to be undertaken (considering aspects such as the extent to which the maximum noise level exceeds the rating background noise level, and the number of times this happens during the night-time period). Reference is also made to guidance on possible impact contained in the NSW <i>Road Noise Policy</i> (RNP). This review states that: • Maximum internal noise levels below 50 dBA to 55 dBA are unlikely to awaken people from sleep • One or two events per night, with maximum internal noise levels of 65 dBA to 70 dBA, are not likely to affect health and wellbeing significantly. It is generally accepted that internal noise levels in a dwelling with the windows open are 10 dB lower than external noise levels. On this basis, a clear margin of safety is apparent on the predicted levels indicated in the DA noise assessment for the site.

Matters Raised	Applicant consideration of matter/response
<u>Underestimated Noise Impacts</u> - As noted above, the Noise Report concludes that the night time noise level generated by the proposed development at the Jacfin Land will be 48dBA. This is based on a number of assumptions with respect to the noise levels of sound-generating components of truck operations, including general truck noise, reversing alarms and braking. As noted by Wilkinson Murray, the Noise Report assumes general truck noise will be 103dBA and that reversing alarms and truck brake release will each generate levels of 115dBA. The Noise Report does not provide any justification for these assumed noise levels. It is unclear from the Noise Report how these levels have been calculated, or from what source these levels have been adopted. The Noise Report also does not set out the calculations used to arrive at an overall noise level of 48dBA for night time operations. Wilkinson Murray has confirmed that it has experience with measurements at higher levels for truck noise and reversing alarms than those assumed in the Noise Report. On the basis of the levels measured by Wilkinson Murray, the night time noise of the proposed development has been underestimated, and if its measured levels are adopted for the proposed development, the result is an exceedance of the relevant night time noise criteria at the Jacfin Land by at least 2dBA. - The Stage 1 Consent, as modified, requires the construction of a 5 metre high noise wall along a portion of the eastern boundary of the OSE. Based on the errors identified by Wilkinson Murray in the Noise Report, Wilkinson	<u>Comment</u> – SLR have advised that as noted in their report SLR report 630.11166-R06, submitted with the application, the source sound power levels used in the noise modelling are based on SLR’s noise source database containing numerous measurements conducted over many years by SLR. These sound power levels are considered representative of the noise sources that have been applied to, and as such, are considered to be appropriate for use in the noise model as a reasonable estimation of the noise source levels likely to represent the proposed vehicles accessing the site. As also noted in SLR report 630.11166-R06, maximum noise levels have been predicted by modelling light vehicle movements on the estate roads and within the carparking areas, modelling heavy vehicle movements on the estate roads and within the hardstand areas, and modelling reversing alarms and heavy vehicle brake releases in the hardstand areas of the development. <u>Comment</u> – SLR have advised that noise modelling conducted during the preparation of the noise impact assessment shows that the proposed 5 metre noise barrier is sufficient to achieve compliance with the noise limits at the nearby sensitive receivers. During the noise mitigation optimisation process

Matters Raised	Applicant consideration of matter/response
Murray has concluded that the approved noise wall will be insufficient to prevent unacceptable noise impacts on the Jacfin Land. Wilkinson Murray has indicated that the noise wall will need to be increased in height to 7 metres in order for the applicable night time noise criteria for the development to be achieved at the Jacfin Land, upon correcting the assumptions adopted in the modelling undertaken by SLR. Calculations undertaken by Wilkinson Murray show that the higher wall would reduce noise from the proposed development by approximately 2dBA, thereby rendering the proposed development compliant. We note that Jacfin's submission in relation to the now approved modification to the Stage 1 Consent (SSD 6917 MOD 1) raised the problematic nature of setting attenuation measures in the Stage 1 Consent in the absence of sufficient details of the developments proposed to be undertaken in proximity to the proposed noise wall. It was contended in that submission that it was impractical to identify, assess and condition the dimensions of a noise wall in a consent where details regarding the sources of noise generation that the wall is intended to mitigated were unknown and not yet even subject of development applications. Unfortunately, it appears that Jacfin concerns were well-founded and now that full details of the proposed Costco development are available, it is apparent that the approved 5 metre noise wall is not sufficient. Jacfin submits that any consent granted in relation to the Costco DA should include a condition requiring the construction of a 7 metre noise wall to mitigate the noise impacts of the proposed development.	undertaken for the assessment, noise barriers of varying heights were considered, however, the modelling indicated that heights above 5 metres had negligible benefit over a 5 metre noise barrier. <u>Comment</u> - No data provided by Wilkinson Murray supporting their assertion that the proposed 5m wall is inadequate. <u>Comment</u> - As there is negligible acoustic benefit in providing a 7m wall, and this would merely result in greater visual impact, this condition should not be imposed.

Matters Raised	Applicant consideration of matter/response
<u>Truck Alarm Assumptions</u> In calculating the noise level of truck reversing alarms and the overall noise impact of truck operations, the Noise Report assumes that all trucks used to transport goods to and from the proposed development will be fitted with non-tonal reversing alarms. This is a significant assumption, given that the use of tonal alarms would require a 5dB penalty to be applied to the predicted noise level and would result in clearly unacceptable noise levels at the Jacfin Land. To mitigate the risk of unacceptable noise impacts on the Jacfin Land, Jacfin submits that, as a minimum, any consent to the Costco DA should include a condition requiring that any truck accessing the facility be fitted with non-tonal reversing alarms. However, even if such a condition is imposed, Jacfin is concerned that Costco will not be able to ensure that this requirement is complied with by all vehicles accessing the site. The proposed Costco warehouse is significant in scale, including 33,588m² in floor space and 169 loading docks. The proposed development will be Costco's primary distribution facility in Australia. The volume of trucks accessing the site at all hours of the day and night will therefore be significant. The Costco DA does not provide any detail as to whether these trucks will come from a single, standardised fleet operated by Costco or a range of suppliers and subcontractors. The Costco DA also does not indicate how Costco proposes to control what vehicles are permitted to enter the site. Presumably, suppliers will use their own vehicles when making deliveries to the Costco warehouse. If this is the case, Jacfin submits that it will be almost	<u>Comment</u> – An Operational Noise Management Plan (ONMP) would be prepared for the development. This would provide specific guidance to the operators of the site to minimise noise impacts at sensitive receivers and provide a framework to manage post operational noise compliance. Notwithstanding, note that a clear margin of safety is apparent in the maximum noise level assessment (refer to comment above regarding maximum noise level events). <u>Comment</u> – A specific condition is not required and unnecessary. A condition ensuring compliance with the noise criteria is more appropriate. <u>Comment</u> - As Costco intend to comply with the established boundary noise criteria levels, these additional conditions are onerous and unnecessary.

Matters Raised	Applicant consideration of matter/response
impossible for Costco to ensure that no trucks with tonal reversing alarms are able to access the site. Accordingly, Jacfin submits that additional conditions of consent are required be imposed under any consent issued to the Costco DA. These conditions should include a requirement that the Applicant specify the operational mechanisms by which they will ensure compliance with the above recommended condition prohibiting the use of tonal reversing alarms, through the preparation and implementation of an Operational Noise Management Plan. - Further, any consent should require noise monitoring be carried out within three months of the commencement of operation of the proposed development, to confirm compliance with the relevant noise limits. Where the noise monitoring demonstrates that the proposed development exceeds these limits, the Applicant should be required to implement further mitigation measures or changes to relevant operating procedures to ensure compliance with the operational noise limits applicable under Condition B18 of the Stage 1 Consent. <u>Forklifts</u> - The Noise Report does not consider noise generated by forklifts outside the warehouse facility on the basis that forklifts will only operate inside the facility. The operation of forklifts outside the proposed warehouse will increase the noise generated by the development above that predicted in the Noise Report.	Comment – An ONMP would be prepared for the development prior to operation which would detail noise monitoring requirements to monitor ongoing compliance with the applicable noise limits. It is also anticipated that a condition of consent requiring a Noise Validation Report (NVR), similar to that included in SSD6917, will be included in the Costco SSD approval. This report will assist in demonstrating compliance with the imposed noise criteria <u>Comment</u> – The DA noise assessment scenarios represent those anticipated for normal operation of the site (ie without forklifts loading from outside). It is noted that forklift operation (load, speed, size, power delivery, type of operation) can vary with regard to generated noise emissions and, while the noise assessment assumes a typical worst-case operational noise level at the proposed location of the activities (ie inside), it may be acceptable (from a noise impact perspective)

Matters Raised	Applicant consideration of matter/response
Accordingly, the consent should include a condition specifying that forklifts are only to operate inside the warehouse facility. <u>Mechanical Plant Noise</u> - The Noise Report considers that mechanical plant noise will be able to comply with the relevant noise limits applicable to the proposed development, however the Costco DA does not include a detailed design to demonstrate how this will be achieved, although it is noted that acoustic louvres, siting of plant and shielding of fixed plant will be adopted to ensure compliance. Jacfin submits, in accordance with the recommendations made by Wilkinson Murray, that any consent to the Costco DA should include conditions requiring that: - a report be prepared by a recognised acoustic consultant assessing compliance of all mechanical plant noise with the applicable noise limits, and lodged with the Department prior to the issue of a construction certificate; - the sound power level of any ground-level condenser unit not exceed 80dBA; and - the sound power level emitted in the easterly direction from each louver and from each roof-mounted air-conditioning unit not exceed 70dBA.	for some types of forklift operations to occur outside subject to management under the site operational management plan. <u>Comment</u> – The location and specification of the equipment would be finalised during detailed design whereby the combined sound power level of the equipment would be confirmed. Any required mitigation (including maximum sound power levels of individual items of plant) to comply with the nominated noise goals would be based on the finalised equipment selection and confirmed at that stage. Applying specific sound power level limits to the individual mechanical plant units at this stage may apply undue restrictions on the ability to select suitable items of plant. Where required, noise levels at the nearby sensitive receivers (where the criteria are applicable) could be minimised by other methods such as screening around the item of mechanical plant or relocating the item, where applicable. As above, it is anticipated that a condition of consent will be imposed requiring a NVR to be prepared within 3 months of operation. This NVR would confirm compliance of plant noise levels with the imposed boundary noise criteria limits.

Matters Raised	Applicant consideration of matter/response
The incorporation of these conditions, compliance with which should be measured as part of the noise monitoring described above, will assist to ensure that the proposed development does not exceed the applicable noise criteria. <u>Construction Noise</u> Construction of the proposed development is likely to generate substantial noise impacts on the Jacfin Land. While construction of the proposed development is likely to pre-date future residential development and occupation of the Jacfin Land, circumstances may eventuate where this is not the case. In this regard, we note that once works have commenced under any development consent granted to the Costco DA, that consent will remain valid and be capable of being acted upon indefinitely. The Costco DA indicates that Costco Wholesale, rather than Goodman Property Services, will undertake the development. The Applicant is therefore not in a position to commit to a particular timeframe for carrying out the development. As per Wilkinson Murray's recommendation, Jacfin submits that any consent to the Costco DA should include a condition requiring the preparation and implementation of a Construction Noise Management Plan in accordance with the requirements of the Interim Construction Noise Guideline of the NSW Environment Protection Authority, in the event that residential developments on the Jacfin Land are complete and occupied prior to completion of construction of the proposed Costco development.	<u>Comment</u> – A Construction Noise Management Plan (CNMP) would be prepared for the development prior to the commencement of construction works, in accordance with the <i>Interim Construction Noise Guideline</i> (ICNG). This would provide specific noise mitigation measures to minimise impacts on all potentially affected sensitive receivers.

Matters Raised	Applicant consideration of matter/response
<u>Conclusion</u> - Given the predicted night time noise level of the proposed development is at the limit permitted under the Stage 1 Consent, and given the errors identified by Wilkinson Murray, Jacfin submits that the Department should require a peer review of the Noise Report. If compliance with the applicable night time noise criteria at the Jacfin Land cannot be demonstrated, then consent for the Costco DA should be refused, unless the Applicant can propose additional mitigation measures that will adequately manage noise impacts within the established noise criteria. - In the event that the Minister is minded to grant consent to the Costco DA, that consent should be subject to the conditions identified and recommended by Wilkinson Murray, in order to ensure that the noise impacts of the development are appropriately managed and mitigated. In addition, a condition of consent should be imposed requiring the preparation and implementation of an Operational Noise Management Plan to ensure that operational procedures are in place to ensure that only trucks with non-tonal reversing alarms access the proposed development. <u>Wilkinson Murray Letter</u> <u>Traffic Noise</u> - The Noise Report indicates that the general noise level (LAeq) calculated at the Jacfin Land as a result of the Costco operation, including the cumulative noise level, will comply with the appropriate limits.	<u>Comment</u> – The maximum noise assessment (based on the LAmax or LA1,1min) is based on EPA guidelines which identify the 48 dBA (ie RBL+15 dBA) as a screening criteria. As no exceedances were predicted, no further detailed assessment is required. Notwithstanding, this review would consider guidance contained in the <i>NSW Road Noise Policy</i> which considers sleep disturbance as relevant to an internal noise level. The review indicates a clear safety margin for this site (refer to earlier comments regarding maximum noise level assessment) <u>Comment</u> – An ONMP would be prepared for the development. This would provide specific guidance to the operators of the site to minimise noise impacts at sensitive receivers and provide a framework to manage post operational noise compliance <u>Comment</u> – Noted

Matters Raised	Applicant consideration of matter/response
The maximum noise level (LA1,1min) calculated by the Noise Report at the Jacfin Land at night time for adverse weather conditions is 48dBA, and this equals the night time noise limit, with no margin of safety. The calculated level is based on assumed noise levels for truck operations (including 103dBA for truck noise, 115dBA for reversing alarms and 115dBA for truck brake release), but no information is provided to justify these assumptions. Wilkinson Murray has measured higher levels than the assumed ones, such as 105dBA for truck noise and up to 118dBA for reversing alarms. The calculated level appears to be under-estimated. There is therefore a reasonable probability that LA1,1min noise level will exceed the 48dBA noise limit.	<u>Comment</u> – SLR noted that in their report 630.11166-R06 submitted the DA, the source sound power levels used in the noise modelling are based on SLR’s noise source database containing numerous measurements conducted over many years by SLR. These sound power levels are considered representative of the noise sources they have been applied to, and as such, are considered to be appropriate for use in the noise model as a reasonable estimation of the noise source levels likely to represent the proposed vehicles accessing the site. It is further noted that the EPA guidance outlined in the NSW <i>Industrial Noise Policy</i> (INP) nominates this criteria as a screening level (and not a ‘limit’). Where an exceedance is indicated, this indicates the requirements for a detailed maximum noise level event assessment to be undertaken (considering aspects such as the extent to which the maximum noise level exceeds the rating background noise level, and the number of times this happens during the night-time period). Reference is also made to NSW <i>Road Noise Policy</i> (RNP). This review states that: - Maximum internal noise levels below 50 dBA to 55 dBA are unlikely to awaken people from sleep - One or two events per night, with maximum internal noise levels of 65 dBA to 70 dBA, are not likely to affect health and wellbeing significantly. It is generally accepted that internal noise levels in a dwelling with the windows open are 10 dB lower than external noise levels. On this basis, a clear margin of safety is apparent on the predicted levels indicated in the DA noise assessment for the site.

Matters Raised	Applicant consideration of matter/response
- Given this, there is a risk that the proposed development will result in unacceptable noise impacts on the Jacfin Land. To mitigate this, the proposed 5 metre noise wall should be extended in height to a total height of 7 metres. Such an increase in height is expected to reduce LA1,1min noise levels at the Jacfin Land by approximately 2dB. - It is also noted that the Noise Report assumes that forklifts will not operate outside the building. The Consent should include a condition to ensure that this assumption is complied with. - It is also noted that it is assumed that truck reversing alarms would be non-tonal in nature and a condition is required to ensure that this assumption is correct for all trucks. If some reversing alarms are tonal, then a 5dB penalty would need to be applied to the predicted noise level (in accordance with EPA policy) and the limit would not be complied with at the Jacfin Land. The higher noise wall proposed above would not mitigate this breach. The practicality of ensuring that all trucks accessing the premises are fitted with non-tonal reversing alarms will depend upon the management system for truck delivery and pick-up. With the information currently available, the practicality cannot be confirmed. Accordingly, even if a condition is imposed prohibiting the use of tonal reversing alarms, there remains a risk	<u>Comment</u> – Noise modelling conducted during the preparation of the noise impact assessment shows that the proposed 5 metre noise barrier is sufficient to achieve compliance with the noise limits at the nearby sensitive receivers. During the noise mitigation optimisation process undertaken for the assessment, noise barriers of varying heights were considered, however, the modelling indicated that heights above 5 metres had negligible benefit over a 5 metre noise barrier. <u>Comment</u> – The DA noise assessment scenarios represent those anticipated for normal operation of the site (ie without forklifts loading from outside). It is noted that forklift operation (load, speed, size, power delivery, type of operation) can vary with regard to generated noise emissions and, while the noise assessment assumes a typical worst-case operational noise level at the proposed location of the activities (ie inside), it may be acceptable (from a noise impact perspective) for some types of forklift operations to occur outside subject to management under the site operational management plan. <u>Comment</u> – refer to comment above regarding maximum noise level events.

Matters Raised	Applicant consideration of matter/response
that some trucks accessing the site will use tonal reversing alarms, causing exceedances of the night time sleep disturbance limit on the Jacfin Land. <u>Mechanical Plant Noise</u> - The process followed in the Noise Report to address mechanical plant noise, involving calculating back from the noise limits to determine the maximum sound power levels of the equipment, is appropriate at this stage of the process. The report indicates that the derived sound power levels can be complied with during the Detailed Design <i>“by the incorporation of acoustic louvres, judicious selection of mechanical plant and localised shielding of fixed plant”</i>. Whilst this approach is sound, the Consent should include a condition requiring that the sound power level of the ground level condenser unit not exceed 80dBA and the sound power level emitted in the easterly direction from each louvre and from each roof-mounted air-conditioning unit not exceed 70dBA. <u>Management of Operational Noise</u> - Even if the noise wall is constructed as recommended above and appropriate noise conditions are implemented, there is a risk that noise levels will exceed the limits at the Jacfin Land because of the variability of truck operation and truck noise.	<u>Comment</u> – The location and specification of the equipment would be finalised during detailed design whereby the combined sound power level of the equipment would be confirmed. Any required mitigation (including maximum sound power levels of individual items of plant) to comply with the nominated noise goals would be based on the finalised equipment selection and confirmed at that stage. Applying specific sound power level limits to the individual mechanical plant units at this stage may apply undue restrictions on the ability to select suitable items of plant. Where required, noise levels at the nearby sensitive receivers (where the criteria are applicable) could be minimised by other methods such as screening around the item of mechanical plant or relocating the item, where applicable. <u>Comment</u> – The noise impact assessment conducted for the development considers the worst-case peak operations for each period with the applicable weather conditions, including concurrent peak vehicle movements across all precincts of the OSE and all mechanical plant operating at 100% capacity continually throughout all periods. As such, the assessment is considered worst-case and conservative in its predictions.

Matters Raised	Applicant consideration of matter/response
- When the Costco development becomes operational, noise monitoring should be carried out at the Jacfin Land to check if the noise limits are being complied with. This will identify the need for any change or treatment to ensure compliance. <u>Construction Noise</u> - As would be expected, the construction of the Costco development would be quite noisy at the Jacfin Land for a limited period of time. If residences have been constructed on the Jacfin Land prior to completion of the Costco development construction, a Noise Management Plan should be implemented for the construction in accordance with the requirements of the <i>Interim Construction Noise Guideline</i>. <u>Conclusion</u> - The above comments demonstrate that the Noise Report underestimates the noise impact of the proposed development and there is a risk of unacceptable noise impact on the Jacfin Land. - It is my view that the Conditions of Consent should address the following issues: - The LA1,1min noise level emitted from the premises should not exceed 48dBA as measured at any location on the Jacfin Land during the hours of 10.00pm to 7.00am on any day;	<u>Comment</u> – An Operational Noise Management Plan (ONMP) would be prepared for the development prior to operation which would detail noise monitoring requirements to monitor ongoing compliance. <u>Comment</u> – A Construction Noise Management Plan (CNMP) would be prepared for the development prior to the commencement of construction works. This would provide specific noise mitigation measures to minimise impacts on all potentially affected sensitive receivers. <u>Comment</u> – As noted above, the noise impact assessment is considered to be comprehensive in its approach to predicting potential noise impacts at the nearby receivers, and that those predictions are considered conservative. As such, it is considered likely that the development will achieve compliance with the noise limits at potentially affected receivers. <u>Comment</u> – The maximum noise assessment (based on the LAmax or LA1,1min) is based on EPA guidelines which identify the 48 dBA (ie RBL+15 dBA) as a screening criteria. As no exceedances were predicted, no further detailed

Matters Raised	Applicant consideration of matter/response
- Within three months of commencement of operation of the Costco development, noise monitoring should be carried out by a recognised acoustic consultant to check compliance with the noise limits. Where the measured levels are found to exceed the limits, modifications should be made to the development or the operating procedures to ensure compliance; - The wall proposed on the eastern site boundary of the Costco development should be of height 7 metres above the retaining wall; - No forklift should operate on the premises outside of the warehouse building;	assessment is required. Notwithstanding, this review would consider guidance contained in the RNP which considers sleep disturbance as relevant to an internal noise level. The review indicates a clear safety margin for this site (refer to earlier comments regarding maximum noise level assessment) Additionally, for clarity, the LAeq noise goals for the development would be applicable at the most-affected point within 30 metres of a sensitive receiver building (or at the receiver boundary if that is less than 30 metres from the receiver building), as outlined in the INP. <u>Comment</u> – An ONMP would be prepared for the development prior to operation which would detail noise monitoring requirements to monitor ongoing compliance with the applicable noise limits. <u>Comment</u> – Refer earlier comment – a noise barrier with a height of 5 metres is considered to be sufficient to achieve compliance with the noise limits, and increasing the height from 5 metres to 7 metres would have negligible benefit to noise at the sensitive receiver locations. <u>Comment</u> – Refer earlier comment – it may be acceptable (from a noise impact perspective) for some types of forklift operations to occur outside subject to management under the site operational management plan

Matters Raised	Applicant consideration of matter/response
- All trucks accessing the premises should be fitted with non-tonal reversingalarms; - Prior to issue of the construction certificate a report prepared by a recognised acoustic consultant shall be submitted addressing compliance of noise from all mechanical plant with the noise limits; - The sound power level of the ground-mounted condenser should not exceed 80dBA and the sound power level emitted in the eastern direction from each louvre and from each roof-mounted air-conditioning unit should not exceed 70dBA; and - If residences have been constructed on the Jacfin Land prior to completion of the Costco development construction, a Noise Management Plan should be implemented for the construction in accordance with the requirements of the <i>Interim Construction Noise Guideline</i>.	<u>Comment</u> – An ONMP would be prepared for the development. This would provide specific guidance to the operators of the site to minimise noise impacts at sensitive receivers and provide a framework to manage post operational noise compliance. Notwithstanding, note that a clear margin of safety is apparent in the maximum noise level assessment (refer to comment above regarding maximum noise level events). <u>Comment</u> – Assessment of the finalised equipment selection would be undertaken. <u>Comment</u> – As noted above, applying specific sound power level limits to the individual mechanical plant units at this stage would apply undue restrictions on the ability to select suitable items of plant. Where required, noise levels at the nearby sensitive receivers (where the criteria are applicable) could be minimised by other methods such as screening around the item of mechanical plant or relocating the item, where applicable. The location and specification of the equipment would be finalised during detailed design whereby the combined sound power level of the equipment would be confirmed <u>Comment</u> – A CNMP would be prepared prior to commencement of construction in order to manage noise impacts at all identified sensitive receivers.