



4 December 2008

Chris Ritchie
Manager - Manufacturing & Rural Industries
Major Development Assessment
NSW Department of Planning
GPO Box 39
Sydney NSW 2001

Attn: Megan Webb

Dear Megan,

**Re: Australian Red Cross Medical Research and Development Project Application
Number 08_0137 – Response to public exhibition**

Goodman received a letter from the Department of Planning dated 29 October 2009 which contained a number of submissions during the exhibition period for the above project.

In accordance with Section 75H(6) of the *Environmental Planning and Assessment Act 1979*, the following is a response to all of the issues raised in these submissions, and in particular those identified by the Department, namely:

- Landscaping of the site; and
- Greenhouse gas emissions of the project.

1.0 City of Sydney

City of Sydney has advised of the following issues:

item	Issue / Comment	Goodman Response
1.1	An adequate turning area is to be provided at the end of the two way, no through route, circulation path in the basement car park	A turning area has not been provided since this is a private car park and therefore a turning area is not required to meet Australian Standards. The parking spaces in this location would be allocated to staff who would be familiar with the arrangement in the basement and have a low volume of movements to and from these spaces thereby minimising the likelihood of any conflicts. This has been discussed and agreed with Council (See Attachment A).
1.2	A single driveway crossover for the car park and service vehicle exit is proposed due to the turning radius of the proposed 19m	The shared driveway crossover for the basement car parking entry/exit and service vehicle exit has been revised.

Level 10, 60 Castlereagh Street Sydney NSW 2000 | GPO Box 4703, Sydney NSW 2001
Australia
Tel +61 2 9230 7400 | Fax +61 2 9230 7444 | info-au@goodmanintl.com |
www.goodmanintl.com

Goodman International Limited ABN 69 000 123 071
Goodman Funds Management Limited ABN 48 067 796 641 AFSL Number 223621
as responsible entity for Goodman Industrial Trust ARSN 091 213 839

	<p>trucks exiting the site. Council's policy is for driveway crossovers to have as small a width as possible, and to also include a pedestrian refuge area if two driveways exist. The turning movement submitted as part of the traffic study shows that a pedestrian refuge cannot be provided in the existing set up due to the turning movement of the exiting service vehicles. This creates a safety concern for vehicles entering and exiting the basement levels at the same time as the 19m trucks exit the site. It is therefore recommended that the applicant produce a 19m Service Truck Management Plan that provides measures to ensure pedestrian and basement vehicle amenity and safety.</p>	<p>Circulation in the basement ramp has been reversed to allow the car park exit to join the service vehicle egress driveway before exiting the site onto public property. This arrangement rationalises the vehicular movement in this location and enables a reduced crossover width. Traffic management measures such as give way/stop signs and mirrors will ensure any vehicular conflict is avoided.</p> <p>A pedestrian refuge is also now provided between the basement entry and service vehicle exit creating a vastly improved arrangement for pedestrians. The final design of the surface treatment of the pedestrian refuge is to be done in consultation with the City of Sydney public domain team prior to issue of a construction certificate.</p> <p>This revised access arrangement has been discussed and agreed with Council (See Attachment A). A revised basement and ground floor plan are included in Attachment B.</p>
1.3	<p>Council's adopted Cycle Strategy and Action Plan 2007 – 2017 is to be implemented by ensuring that the footway at the site frontage is constructed to meet NSW bicycle guidelines for shared paths.</p>	<p>A 2.4m setback and dedication has been provided along the full frontage of the site. This will ensure a footpath width of typically 4m. The NSW bicycle guidelines require a footpath width of 2.5-4m for shared paths. Accordingly this requirement is accommodated.</p>
1.4	<p>Council also notes that the issues raised in previous correspondence (email dated 22 July 2008) are still applicable. These issues are as follows:</p> <ul style="list-style-type: none"> • Driveways to be set back from side boundaries by 1.0m 	<p>Provision has been made for a driveway setback of 600mm on the side boundaries. The driveways are compliant with relevant standards to ensure they have sufficient width for circulation. This has been confirmed with swept path analysis by traffic consultant MWT. This has been discussed and agreed with Council.</p>

2.0 Roads and Traffic Authority (RTA)

The RTA has advised that it would grant concurrence under Section 138(2) of the *Roads Act* to the development application subject to Council's approval of the application and the following requirements being included in the Departments conditions of development consent:

<i>item</i>	<i>Issue / Comment</i>	<i>Goodman Response</i>
2.1	<p>The design and construction of the entry / exit driveways off O'Riordan Street shall be in accordance with AS2890.1 – 2004 / AS2890.2 – 2002, (Drawing No. DA-D-002, Issue: A, Dated: 06/08/08) and the RTA's requirements.</p> <p>A certified copy of the design plans shall be submitted to the RTA for consideration and approval prior to the release of the construction certificate and commencement of works.</p> <p>The RTA fees for administration, plan checking, civil works inspections and project management shall be paid by the developer prior to commencement of works.</p>	<p>The entry and exit driveways have been designed in accordance with the relevant Australian Standards.</p>
2.2	<p>The Department of Planning should ensure that post development storm water discharge from the subject site into the RTA drainage system does not exceed the pre-development discharge.</p> <p>Detailed design plans and hydraulic calculations of any changes to the stormwater drainage system are to be submitted to the RTA for approval, prior to the commencement of any works.</p>	<p>The project would result in a negligible increase in impervious surfaces (approximately 152m²). Therefore the post development stormwater discharge from the site would be substantially the same.</p> <p>Goodman has received confirmation from both Sydney Water and Sydney City Council that detention is not required on site. This is primarily due to the location of the site within the broader catchment and the requirement for stormwater to be conveyed immediately rather than detained which could then affect upstream flows. (See Appendix F of EA).</p> <p>The RTA guidelines state the following: "RTA's policy is to design roads to ensure that the existing natural overland flows and the groundwater regimes on and around road corridors are either retained or will have only minimum alterations".</p> <p>Stormwater consultant Whipps Wood has advised that the proposal would fall under the 'minimum alterations' section</p>

		of this sentence since development of the existing site would result in an increase in impervious area of only 152m ² . Therefore it is deemed unnecessary to provide any on-site detention.
2.3	<p>The developer is to submit detailed geotechnical report(s), excavation management plan and structural design in relation to the excavation and retaining structures to the RTA for acceptance. The developer is to pay the full cost of any assessment by the RTA.</p> <p>The design of the retaining structures is to include traffic surcharge in accordance with AS 5100.</p> <p>The developer is to undertake monitoring of ground movements along O’Riordan Street during excavation and provide the results to the RTA.</p> <p>Permanent anchors are not permitted within the road reserve. Any temporary anchors are to be de-stressed at the completion of the work.</p> <p>The developer is to obtain clearance from utility organisations in relation to the potential impact of the excavation adjacent to the road reserve.</p> <p>The developer is to repair any damage to RTA assets resulting from the construction of the development to the satisfaction of the RTA.</p>	This information will be provided prior to the commencement of any works
2.4	Any boom gates proposed are to be located a minimum 12 metres (2 car lengths) or 3% of the car parking capacity from the property boundary on O’Riordan Street in accordance with Table 3.3 of AS 2890.1 for queuing at control points for car parking areas less than 100 spaces.	A boom gate is not proposed.
2.5	Any proposed landscaping and/or fencing must not restrict sight distance to pedestrians and cyclists travelling along the footpath of O’Riordan Street	Design will ensure that appropriate sight distances are retained.
2.6	All works / regulatory signposting associated with the proposed development are to be carried out at no cost to the RTA.	Noted.

--	--	--

In addition, the RTA has advised of the following comments to assist the Department in its determination of the development application:

<i>item</i>	<i>Issue / Comment</i>	<i>Goodman Response</i>
2.7	The Department of Planning should ensure all loading facilities are appropriately designed to ensure all vehicles can enter and exit the driveways in a forward direction.	All loading facilities are designed to ensure all vehicles can enter and leave the site in a forward direction and all required manoeuvres are in accordance with Australian Standards.
2.8	Off-street parking associated with the proposed development, including driveways, grades, aisle widths, parking bay dimensions, sight distance requirements, and turn paths are to be in accordance with AS 2890.1 – 2004 and AS 2890.2 – 2002.	All off-street parking has been designed in accordance with AS 2890.1 – 2004 and AS 2890.2 – 2002.
2.9	Existing 'No Stopping', 'clearway' and 'special event' restrictions are to remain	Noted.
2.10	A demolition and construction traffic management plan detailing construction routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to Council for approval, prior to the issue of a construction certificate.	A Traffic Management Plan was submitted with the EA in the Construction and Demolition Environmental Management plan.
2.11	Any traffic control during construction must be carried out by accredited RTA approved traffic controllers.	Noted.

3.0 Energy Australia

Doug Sneddon Planning Pty Ltd made a submission on behalf of Energy Australia, notifying of the recent exchange of contracts by Energy Australia to purchase the neighbouring No.15 O'Riordan Street, which adjoins the northern and western boundaries of the proposed development. Energy Australia intends to develop this land for the development of a major works depot servicing the Sydney CBD and inner ring suburbs. This will replace the existing Zetland Works Depot located at Nos. 122-138 Joynton Avenue, Zetland.

The following is a response to the key issues raised in this submission:

<i>item</i>	<i>Issue / Comment</i>	<i>Goodman Response</i>
3.1	It is understood that the proponents would not have been aware at the time of preparing the DA documentation that an adjoining site was acquired by Energy Australia for future depot purposes. The site	Goodman and ARCBS believe that the elevated roof terrace will provide sufficient elevation (RL 21m AHD) above the ground level to reduce adverse noise and air emissions at

	<p>analysis provided in the application states that the rear of the site has good solar orientation and has views towards the city, offering the potential to provide an outdoor recreation area for employees. Consequently, the architectural design provides for a large outdoor terrace at the rear of Level 2, facing into Energy Australia's site, where future works depot activities may act to reduce the amenity of the proposed outdoor terrace.</p>	<p>ground level resulting from future operation of the depot.</p> <p>Goodman will seek to remain involved in the future design process of the Depot to ensure it is designed and implemented appropriately.</p>
3.2	<p>It is noted that there is no indication in the supporting documentation that the proposed medical laboratory will contain sensitive equipment, the operation of which could be adversely affected by surrounding industrial activities of the nature intended by Energy Australia.</p>	<p>The proposed facility will house medical equipment which can be sensitive to vibration. However, ambient vibration levels from existing traffic on O'Riordan street and the nearby Airport Rail Line have been identified and equipment installation will be designed accordingly – it is unlikely that any additional vibration above these background levels would result from the operation of the depot.</p> <p>Vibration levels during construction of the future depot would need to be managed by Energy Australia to ensure they did not exceed the appropriate levels. It would be necessary to ensure Energy Australian adhere to these guidelines during construction with vibration monitoring to prevent any adverse effects on the subject site or other neighbouring properties. This should be required as a condition of their development consent.</p>
3.3	<p>It is considered that it would be prudent for the applicant to be informed by the Department that Energy Australia is purchasing No.15 O'Riordan Street, Alexandria for a future works depot and related operational purposes, so that the opportunity is available to the applicant to make any design changes in recognition of Energy Australia's proposed future use of adjoining land</p>	<p>Goodman has contacted Energy Australia to arrange a site visit of the existing facility to ensure any other unforeseen aspects to the future design of the depot are appropriately managed.</p>

4.0 Ministry of Transport

The Department of Planning received a submission from the Ministry of Transport who advised that they have no objection to the matter proceeding and has no further comment.

5.0 Leah Bloomfield & Robin Nahum

The Department of Planning has received a submission from Leah Bloomfield & Robin Nahum. The issues raised in this submission are identified below:

item	Issue / Comment	Goodman Response
5.1	Approval be subject to the owner undertaking to provide an easement along the south-western boundary that will allow pedestrian and bicycle traffic from Beaconsfield and the Green Square redevelopment to travel via Johnson St through the site and onto Bourke Road and, more particularly, into Maddox Street, this being the standard route to Erskineville and Newtown.	A cyclepath connection is already proposed to be provided through the neighbouring block – 15 O’Riordan Street via an extension of Bowden Street. This is documented in the Green Square DCP. It would therefore be contrary to the planning controls and identified future urban structure to burden this site with a cycle path. In addition, the proposal ensures that a two-way cycle path will be provided along the full frontage of O’Riordan street in accordance with NSW Bicycle path guidelines and the City of Sydney Cycle Strategy and Action Plan 2007-2017.

6.0 Department of Planning

The Department of Planning has identified the following issues to be given further consideration:

item	Issue / Comment	Goodman Response
6.1	Greenhouse Gas: The greenhouse gas assessment provided included very little detail on the energy requirements of the project and feasible options to minimise greenhouse gas emissions. Please provide further details of the greenhouse gas emissions of the project and the feasibility of options to reduce or manage emissions, such as photovoltaic cells.	To be addressed separately.
6.2	Landscaping: the landscaping of the site appears to have been reduced despite the Department’s previous request to explore options to increase the landscaping. Please provide additional landscaping along the entire western boundary of the site, on the roof terrace and, if possible, around the front corners of the building.	A revised landscape plan is included in Attachment C. The revised proposal will incorporate generous landscaping on the perimeter of the accessible area of the terrace. Planting is to comprise of a mix of endemic species which will be hardy and well suited to this environment. The depth of soil will allow

		<p>planting to grow to a mature height without having any adverse impact on the structure.</p> <p>No additional landscaping is provided on the front corners of the building. Design of the public domain in this manner will allow a wider pedestrian path of travel which will allow a two way cycle path. Safety and ease of pedestrian movement in this location is considered an important objective with the site being within 5 minutes walking distance from Green Square Station. This is consistent with the City of Sydney's broader public domain strategy and pedestrian and cycle strategy by allowing sufficient width for a two way off-street cyclepath. In addition, O'Riordan Street is heavily trafficked and increasing the footpath width will allow greater separation of pedestrians from vehicles.</p> <p>Landscaped side setbacks are provided in a generally consistent manner with the South Sydney DCP 1997: Urban Design, Part F: Industrial Development. No additional rear landscape setback has been provided. ARCBS must maintain the area for the processing level at the ground floor due to the detailed processing activities and separation of activities required which prevents any reduction in the size of the floor plate to allow increased side or rear setbacks. It is also necessary to allow maximum utility of the hard stand area. Any proposed landscaping at the rear of the site would have difficulty surviving due to the harsh environment and would be difficult to maintain. For this reason two coppers of hardy endemic trees are proposed in each corner of the site. This boundary, with the exception of each corner would not be seen from the street and therefore further landscape along the rear boundary would have no positive impact on the public domain.</p>
--	--	--

		<p>In addition, Energy Australia have acquired the adjacent site for the purpose of a works depot and therefore the imposition of a narrow landscape setback between two loading and servicing uses is not considered an effective use of space.</p>															
6.3	<p>Noise: the Noise Assessment does not appear to assess the total impact of all noise sources of the projects plant noise emissions and internal vehicle noise emissions. Please specify the total noise emissions from the operation of the project and whether it meets the relevant noise criteria.</p>	<p>Acoustic Logic Pty Ltd assessed the total impact of all noise sources of the project (See Attachment D). With respect to the total impact of all noise sources it is necessary to assess the total cumulative noise level against two criteria:</p> <ul style="list-style-type: none"> • Intrusiveness – 15 minute interval; and • Amenity – over the whole of the day, evening or night period as applicable <p>Based on EPA/DECC guidelines, Acoustic Logic recommend the following Acceptable Noise Levels:</p> <table border="1"> <thead> <tr> <th><i>Time of Day</i></th><th colspan="2"><i>Recommended Acceptable Noise Levels dB(A)Leq</i></th></tr> <tr> <th></th><th>Intrusiveness (15min)</th><th>Amenity (period)</th></tr> </thead> <tbody> <tr> <td>Day (7am to 6pm)</td><td>60</td><td>55</td></tr> <tr> <td>Evening (6pm – 10pm)</td><td>53</td><td>45</td></tr> <tr> <td>Night (10pm-7am)</td><td>46</td><td>40</td></tr> </tbody> </table> <p>Noise Sources for the proposed development are identified as follows:</p> <ul style="list-style-type: none"> • Vehicle Movements • Air conditioning plant • Ventilation plant • Internal process equipment noise including vehicle movements 	<i>Time of Day</i>	<i>Recommended Acceptable Noise Levels dB(A)Leq</i>			Intrusiveness (15min)	Amenity (period)	Day (7am to 6pm)	60	55	Evening (6pm – 10pm)	53	45	Night (10pm-7am)	46	40
<i>Time of Day</i>	<i>Recommended Acceptable Noise Levels dB(A)Leq</i>																
	Intrusiveness (15min)	Amenity (period)															
Day (7am to 6pm)	60	55															
Evening (6pm – 10pm)	53	45															
Night (10pm-7am)	46	40															

		<ul style="list-style-type: none"> • Generator <p>Based on assessment of similar facilities the predicted worst case noise emissions resulting from the sources identified have been assessed as a cumulative total.</p> <p>In terms of intrusiveness, the worst case cumulative impact of all noise sources is identified as 43 dB(A) Leq. This is within the recommended maximum of 46 dB(A) Leq at night.</p> <p>In terms of amenity, the worst case cumulative impact of all noise sources is 40dB(A) Leq. This is equal to the recommended total at night time of 40dB(A) Leq. and therefore within recommended guidelines.</p> <p>This assessment indicates that the proposed development would comply with the relevant noise objectives.</p> <p>A detailed assessment of the final plant selections and load profiles will be undertaken prior to and during construction to ensure noise levels will be within these stated goals.</p>
6.4	<p>BCA: Please confirm how the issues in the EA's Preliminary BCA Assessment Report would be resolved, particularly the fire access issue (see C2.4)</p>	<p>BCA Section C2.4: Deemed to satisfy, perimeter vehicular access requires the following:</p> <p>A minimum unobstructed width of 6m is required around the building for perimeter vehicular access with no part of its furthest boundary more than 18m from the building. Furthermore, the 6m vehicular access must have a load bearing capacity and unobstructed height to permit the operation and passage of fire brigade vehicles, and must provide reasonable pedestrian access from the vehicular access to the building.</p> <p>The referenced plans generally show compliance with the above, however there is a relatively minor non-</p>

		<p>compliance on the northern and southern sides where the kerb/footpath encroaches upon the required 6m vehicular access.</p> <p>A fire engineered Alternative Solution will be prepared by Rawfire to address this deemed-to-satisfy non-compliance in consultation with the NSW Fire Brigades. It is understood that the fire engineered alternative solution will effectively demonstrate that the current proposal satisfies BCA Performance Requirement CP9 with no additional measures being required.</p> <p>The Alternative solution will be referred to the NSW Fire Brigades prior to issue of the CC in accordance with clause 144 of the EP&A Regulation 2000. In the unlikely event that the brigades do not support this Alternative Solution then this would be addressed by one of two ways - 1) the footpaths/kerbs would be recessed to ensure that a minimum 6m width is achieved. In this instance, it is considered that a change of this nature could be addressed at CC stage without giving rise to any inconsistencies in the development consent, or 2) a fire compartmentation solution would be provided whereby the building would not be classified as a large isolated building and therefore the need for perimeter drive around access would be eliminated altogether from the fire fighting strategy.</p>
--	--	--

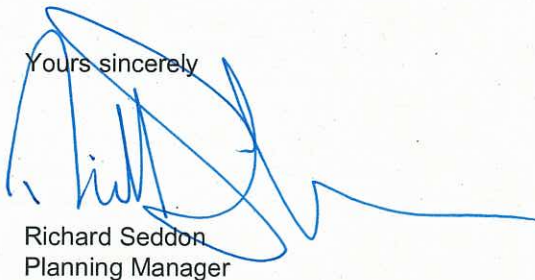
7.0 Sydney Water

item	Issue / Comment	Goodman Response
7.1	<p>Stormwater</p> <p>Over time, properties between O'Riordan Street and Bourke Street have been developed in a manner that obstructs the natural overland flow paths in the area. Flood modelling reveals the potential serious flooding in O'Riordan Street. Flood</p>	<p>Cardno have provided a response in Attachment E. In summary, under existing conditions the site is subject to some on-site ponding, however it does not act as an overland flow path for runoff to be distributed to Bourke Road in the 1% AEP event.</p>

	<p>depths in the order of one metre occur before overland flows top the crest in O'Riordan Street to the north of the subject site. The proponent should investigate the potential impacts of the proposal on the obstruction of local overland flood, to ensure that an adequate and safe overland flow path remains available through the site. Sydney Water encourages the proponent to lower the external car parking areas as part of a strategy to re-establish an overland flow path between O'Riordan Street and Bourke Street.</p>	<p>Flood modelling of the broader catchment shows that if flood storage in upstream areas such as the subject site were to be reduced then this would result in an increase in the flood impact on properties and roads downstream and therefore would need to be resolved as part of a precinct based solution.</p> <p>Accordingly, the proposed development would result in an equivalent flood storage to the existing condition and would therefore have no adverse impacts on neighbouring properties or downstream sites up to and including the 1% AEP event – i.e. the pre-development and post development storage volumes would remain consistent.</p>
7.2	<p>Water Sensitive Urban Design & Ecological Sustainable Development</p> <p>The development presents an excellent opportunity to integrate the passage and treatment of stormwater using Water Sensitive Urban Design (WSUD). WSUD links water infrastructure, landscape design and the urban built form. WSUD is more attuned to natural hydrological and ecological process than the conventional stormwater design.</p> <p>Sydney Water encourages all developers to implement best practice treatment objectives:</p> <ul style="list-style-type: none"> 80% reduction in Total suspended solids 45% reduction in total Phosphorus 45% reduction in Total Nitrogen <p>Maximise stormwater re-use through integrated water cycle management, which can reduce potable water demand and assist in achieving the above pollutant load reduction objectives</p>	<p>These water quality objectives have been adopted in the design of the facility. Prior to construction, the contractor will liaise with the supplier of the pollution control devices to ensure that the product being supplied will meet the stormwater management treatment objectives as outlined by Sydney Water.</p> <p>Preliminary investigations indicate this may be achieved by a variety of readily available pollution control devices.</p> <p>Rainwater re-use has been documented for use for landscape watering. Additional alternate uses for this water such as for WC and urinal flushing may occur.</p>
7.3	<p>Fire Fighting Capacity</p> <p>Sydney Water does not design nor provide fire-fighting capacity from its systems or consider fire fighting requirements as part of the Section 73 process. The assessment of</p>	<p>The fire fighting capabilities for the development will be met by the installation of on-site hydrant and sprinkler storage tanks and pumps. Pumps are required whenever storage</p>

	fire fighting capability is the responsibility of the applicant and should be carried out separately. However, the applicant must ensure that the domestic water supply arrangements for the development (under Section 73) does not adversely impact the existing fire fighting capability of surrounding areas. Sydney Water can provide water pressures to help applicants assess the impacts of the development on the performance of the Sydney Water system.	tanks are installed (spatial allowance for these has been provided) and will provide the site with fire fighting facilities to meet the codes and standard requirements. Having storage tanks for fire fighting purposes will ensure that, in the event of a fire, the services for surrounding developments would not be adversely impacted.
7.4	Section 73 Certificate Sydney Water will assess the impact of the proposed development when the proponent applies for a Section 73 certificate. This assessment will enable Sydney Water to specify any works required as a result of the development and to assess whether amplification and/or charges are applicable.	A section 73 certificate will be applied for by a Water Services Coordinator upon receipt of major project approval.

Yours sincerely



Richard Seddon
Planning Manager

Enc.

- **Attachment A:** Letter and minutes of meeting from Masson Wilson Twiney, Traffic and Transport Consultants Pty Ltd, dated 1 December 2008.
- **Attachment B:** Revised ground floor and basement plans DA-D-001 & DA-D-002, prepared by Bligh Voller Nield, dated 26 November 2008
- **Attachment C:** Revised Landscape plan and planting schedule prepared by Tract Consultants Pty Ltd, dated 27 November 2008
- **Attachment D:** Letter from Acoustic Logic Noise and Vibration Consultants Pty Ltd, dated 18 November 2008
- **Attachment E:** Letter from Cardno Lawson Treloar Pty Ltd, dated 21 November 2008