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03 March 2017

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

Dear Chris,

SSDA 7719 - SIGMA WAREHOUSE AND DISTRIBUTION CENTRE

An Environmental Impact Statement (EIS) and supporting documentation was submitted on 4 November 2016 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 3A within the Oakdale South Estate (OSE).

The proposal was for the construction, fit out and use of a warehouse and distribution facility which is to be operated by Sigma for the warehousing, storage and distribution of its pharmaceutical products, including prescription and over the counter medicines, FMCG and general merchandise products.

The application package for SSDA 7719 was placed on public exhibition from 17 November 2016 until 16 December 2016. 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 and should be read in conjunction with the attached supporting information.

Attachment 1 – Options Layout Plans

Attachment 2 – Examples of hardstand areas on street frontages

Attachment 3 – Revised Traffic Impact Assessment

Attachment 4 – Revised Architectural Plans

Attachment 5 – Updated Landscape Plans

SIGMA SITE LAYOUT - OPTIONS ANALYSIS

The design of the Sigma Warehouse has been developed following extensive operational analysis and design development. As demonstrated by the analysis in **Table 1** and shown in the options analysis plans at **Attachment 1** the project architects have refined the design and layout of the proposed Sigma facility over the last 12 months to reach the optimum site layout.

The key features of the proposed layout are as follows.

- North and west facing office to obtain views over environmental zone.
- Reduces impacts from adverse weather conditions particularly to cold winds and wind driven rain from the south west in winter.
- Functional north facing hardstand to satisfy Sigma docking requirements.
- Permits warehouse proportions to accommodate Sigma's preferred internal racking and automation system.
- North facing hardstand enables for a single entry/exit which allows for an essential security checkpoint.
- Parking area located adjacent to the proposed office to enable security surveillance and ease of access to and from the office for staff.

In relation to the proposed vegetative screening the Landscape Architect has confirmed that the species selection will ensure that the loading dock areas will be effectively screened thereby demonstrating consistency with this control. It is noted that several developments in the Erskine Park area have loading docks fronting estate roads this includes Grady Crescent and Lockwood Road in Erskine Park and as such not without precedent within this industrial precinct where operationally required (Refer **Attachment 2**).

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 11 agency submissions were received. We note that all submissions received make no objection to SSDA 7719.

The Department of Planning has also provided key issues to be addressed in the response to submissions in its letter dated 22 December 2016.

A response to comments provided by the DP&E and within the submissions are provided in **Table 2** below.



SIGMA SITE LAYOUT – OPTIONS ANALYSIS

An options analysis has been undertaken to demonstrate the factors considered in the final orientation of the proposed warehouse. These options are illustrated at **Attachment 1**

Table 1 – Options Analysis

		North Facing Hardstand Preferred Option		East Hardstand		South Hardstand		West Hardstand
Office Amenity	✓	North and west facing office to improve solar access and office efficiency. Allows for views over environmental zone.	✓	North and west facing office to improve solar gain. Allows for views over environmental zone.	✓	North and west facing office to improve solar gain. Allows for views over environmental zone.	✓	East and north facing office allows for good solar access and office efficiency.
Weather Exposure	✓	Reduces impacts from adverse weather conditions particularly to cold winds and wind driven rain from SW. in winter.	✓	Avoids exposure to cold winds and wind driven rain from SW.	✗	Docks exposed to cold winds and wind driven rain from SW	✗	Increased solar impact of low western sun on dock face and operational areas. Docks exposed to cold winds and wind driven rain from SW.
Hardstand Functionality	✓	Functional hardstand to satisfy Sigma docking requirements.	✗	Reduced hardstand area resulting in insufficient length of hardstand to accommodate Sigma's storage and access requirements.	✗	Left hand down reversing manoeuvre not acceptable for trucks. Insufficient queuing area for trucks at security check point	✗	Insufficient queuing for trucks entering and exiting hardstand.

	North Facing Hardstand Preferred Option		East Hardstand		South Hardstand		West Hardstand	
				Insufficient queuing for trucks entering and exiting hardstand.		at the western end of the hardstand area.		Insufficient length in hardstand to accommodate Sigma requirements.
Building Proportions	✓	Permits warehouse proportions to accommodate Sigma's preferred internal racking and automation system.	✗	1:1 only. Not suitable due to inefficient movement of storage and materials with man / machine separation	✗	Augmentation of the warehouse envelope to accommodate E2 zone in north eastern corner will impact on proposed racking and automation system.	✗	1:1 building proportions not suitable for Sigma's operations due to inefficient movement of storage and materials.
Security	✓	North facing hardstand enables for a single entry/exit which allows for an essential security checkpoint.	✗	Disconnect between office and the security and loading dock areas.	✗	Insufficient queuing area for trucks at security check point at the western end of the hardstand area.	✗	Disconnect between office and the security and loading dock areas
Car parking functionality	✓	Parking area can be located adjacent to the proposed office to enable security surveillance. Car park location reduces walking distance to office.	✓	Parking area can be located adjacent to the proposed office to enable security surveillance. Car park location reduces walking distance to office.	✗	Loss of car parking due to the increase in building length.	✓	Parking area can be located adjacent to the proposed office to enable security surveillance. Car park location reduces walking distance to office

Table 2 – Response to Submissions

Matters Raised	Applicant consideration of matter/response
Department of Planning	
<u>Urban Design and Layout</u>	
Layout inconsistent with several urban design principles in Design and Public Domain Report (DPDR) accompanying the EIS for the Concept Proposal (SSD 6917), approved on 26 October 2016, and the Penrith Development Control Plan (DCP) 2014 - Erskine Business Park.	<ul style="list-style-type: none"> • The proposed site layout responds to Sigma’s operational requirements as well as addressing the development controls for the OSE as adopted in the site specific DCP. This is expanded on further below.
The proposed citing [sic] of the main warehouse does not adequately address, activate or celebrate either Estate Road 1 or Estate Road 4 and as such is inconsistent with a key design aim and not clear which frontage has been considered the main frontage.	<ul style="list-style-type: none"> • The site specific DCP with which the proposal generally complies allows for flexibility in design to account for specific customer operational needs. • The orientation of the proposed building responds to the specific constraints of the site and the operational requirements of Sigma. • The proposed built form is consistent with other warehouse developments within the Oakdale Estate and other similar industrial estates. There are significant limitations on providing a varied approach to the built form due to the specific warehouse typologies required for the specific operational requirements of Sigma.
The proposed office location lacks prominence, contrary to Section 03.5 and 03.6 of the DPDR. This results in a missed opportunity to provide an activated streetscape and architectural interest and relief from the massing	<ul style="list-style-type: none"> • The key design requirements for Sigma were: <ul style="list-style-type: none"> ○ To locate the office in the north-western corner to take advantage of views to the environmental zone for staff amenity,

Matters Raised	Applicant consideration of matter/response
<p>of the main warehouse building which could be achieved should the office be located on either the southern, eastern or northern elevations;</p>	<ul style="list-style-type: none"> ○ Provide north facing hardstand to mitigate impact of adverse weather from south and west, ○ Co-locate parking areas adjacent to office areas to reduce walking distance to / from main office ○ warehouse proportions as indicated on the site plan to accommodate internal racking and proposed automation, ○ use of a single entry / exit point for hardstand for security control away from the main frontage. ○ On site queuing, not to impact operational use of the hardstand <p>The ability to achieve the above operational criteria was a fundamental requirement of Sigma's site selection. If re-orientated, the facility would not be able to support the operations as intended.</p>
<p>The office is located a short distance from the proposed amenity lot adjacent to the north (as the crow flies) however would require employees to walk approximately 700m via the proposed footpath around the outside of the proposed warehouse building, potentially discouraging access on foot;</p>	<ul style="list-style-type: none"> • Goodman has indicated the intention is to provide direct access to the amenity lot via a security gate thus reducing the walking distance for employees to access the adjacent amenities precinct.
<p>Consideration should be given to increasing the landscaped setback to Estate Road 6 to enable native tree species to be planted to assist with screening of the loading docks and to provide a soft transition to the proposed amenity precinct adjacent to the north.</p>	<ul style="list-style-type: none"> • No increased landscape setback to be provided. • Landscaping is proposed at a minimum of 50% of the setback to Estate Road 4 which complies with the approved site specific controls. A 2.5m landscaped strip is provided to Estate Road 6. This is considered

Matters Raised	Applicant consideration of matter/response
	<p>acceptable particularly as additional street trees are also provided along Estate Rd 6, which will enhance the on-lot landscaping and provide additional screening. Street tree planting includes rows of 6 narrow-leafed Ironbark trees which mature at 15m high and 6m wide canopy. The landscaping to Estate Road 6 is the most favourable outcome given the constraints of the site and the specific operational requirements of Sigma.</p>
<p>Penrith DCP Erskine Business Park 2014 including architectural/design control No. 5 which requires loading docks to be located towards the rear of allotments and screened from view through physical and/or vegetation screening. Section 05.4 of the DPDR also states that the rear of properties shall host a more densely vegetated outcome.</p>	<ul style="list-style-type: none"> Given the site has frontage to Estate Road 1 and 4 and 6, has irregular boundaries to the west, and the required warehouse proportions and orientation, it is not considered possible to locate the loading dock area at the rear of the site. Landscaping has been selected by Sigma to reflect its operations and the level of security being proposed for the facility. Street trees along Estate Road 1, 4 & 6 consist of groups of native tree planting, including groups of shrubs with complementing groundcovers. This landscape treatment, approved under the Stage 1 Masterplan (SSD 6917), will over time provide effective screening of the loading dock area and softening of the proposed built form. In particular, the landscaping provides screening to the loading dock and consists of the following: <ul style="list-style-type: none"> High level screening will be provided by groups of six (6) <i>Corymbia Maculata</i> trees, with a mature height of 15m and a width of 7m trees. (These trees are proposed along the entire frontage of Estate Road

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<p>Consideration should be given to providing a consistent setback on the eastern elevation with that of the adjacent Toyota site to the south.</p>	<ul style="list-style-type: none"> - Low level screening (i.e 1- 3 metres) will be provided by large groups of <i>Viburnum Ordoratissimum</i>, which will be planted across the extent of the boundary. - In addition to the above, a combination of <i>Pennisetum 'Nafray'</i> , <i>Gazania Tomentosa</i>, and <i>Trachelospermum Jasminoides</i> are proposed to ensure a green, and softened interface along the road frontages. <ul style="list-style-type: none"> • The proposal provides minimum 7.5m building setbacks which complies with the requirements of the site specific DCP. • The size of the storage and operation areas of the building have been designed according to Sigma's operational requirements. • The constraints of the site mean that applying a consistent setback to Estate Road 1 will significantly reduce either the area of storage or width of the hardstand area. The site is also constrained by the location of E2 Zoned land and amenity precinct to the north and E2 Land to the west. • The design of the adjacent Site 3B (Toyota) has been significantly informed by the specific operational requirements and needs of Toyota. Given the differences in requirements between the end users and size/configuration of the development sites, it is not feasible nor practical to apply a one size fits all approach to development setbacks, noting that both sites comply with the numerical requirements approved in the site specific DCP.

Matters Raised	Applicant consideration of matter/response
<p>The Department has some concerns due to these unresolved layout, urban design and landscape matters. As the Oakdale South Estate is in its early stages of development it is important to set a positive precedent for future warehousing developments. By encouraging warehouse and office buildings that address primary frontages, activate streetscapes, provide architectural interest and reduce the visual impact of loading docks, the overall visual amenity of the estate would improve and the aims and objectives of the broader estate would be realised.</p>	<ul style="list-style-type: none"> • The proposed buildings within the OSE are operational facilities designed specifically to suit the requirements of each end user. Whilst it is acknowledged that active frontages would be a desirable urban design outcome, the operational importance of the OSE as a strategically important employment hub, serving the direct and indirect needs of the growing Western Sydney region (including the future proposed airport at Badgerys Creek) cannot be understated. • The ability for end users to design facilities according to their specific operational requirements is critical to attracting long term occupants and thereby securing the economic prosperity of the WSEA.
<p><u>Noise</u></p> <p>The Noise Impact Assessment includes modelling of predicted noise levels based on worst case traffic movements. This assessment should be updated to include all noise generating uses including plant and equipment in accordance with the Secretary's Environmental Assessment Requirements dated 21 July 2016</p>	<p>Similar to the noise impact assessment submitted with the s.96 Masterplan, plant and equipment noise have been assessed in the Sigma noise assessment.</p> <p>In addition to light and heavy vehicle movements on the estate roads and within the Sigma site, loading activities are modelled in the hardstand area including gas powered forklift operations, heavy vehicle manoeuvring and maximum noise sources such as heavy vehicle air brake releases.</p> <p>The following sound power levels (SWLs) have been modelled for these sources</p> <ul style="list-style-type: none"> • Light vehicle movements: 96 dBA

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	<ul style="list-style-type: none"> • Heavy vehicle movements: 106 dBA • Gas powered forklifts: 93 dBA • Heavy vehicle air brake release: 115 dBA LAMAX <p>The exact models of fixed plant and their locations are not yet known, so a cumulative SWL of 100 dBA for all external plant on the Sigma site and conservative equipment placement (i.e. rooftop locations) have been modelled.</p> <p>These noise sources are included in the predicted results discussed in the noise impact assessment.</p>
<u>Preliminary Hazard Analysis</u>	
The Preliminary Hazards Analysis should be updated taking into account the following comments	Core Engineering's responses to DP&E's comments are provided below.
The quantity of DG content considered in the assessment of aerosol warehousing facility has been based on the actual DG content within each aerosol can. The Department considers the assumption of the full package weight of the aerosol cans to be taken as LPG is over-conservative;	<p>It is agreed that using the full package weight of an aerosol canister is overly conservative; hence, the DG component (i.e. the propellant) has been used in the analysis. The propellant is approximately 25% of the product weight and this weight has been used in the analysis as indicated in the sub-note to Table 3-1.</p> <p>Section 1.1 of the report refers to the use of full package weight of the aerosol which was used in the State Environmental Planning Policy No. 33 assessment which is a conservative approach to ensure aerosol facilities</p>

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	which may be considered potentially hazardous are assessed for risk to surrounding land uses.
The risk analysis provided in Section 4.1 of the PHA appears to be incomplete. Both risk of injury and risk of fatality should be assessed in the analysis. The PHA focusses on risk to injury only; and	The analysis provides a conservative assessment of the facility by considering injury as the determination of whether further assessment is required. The analysis assumes that if an injury could occur (i.e. 4.7 kW/m ²), then this could result in a fatality; hence, the incident would be analysed further. This provides more conservatism as the impact radius for injury is significantly larger than fatality.
It is noted that the assessment of societal risk may not be relevant for this development due to the separation distance from the closest residence. However, the statement in section 4.1 that " <i>... a development proposal involves a significant intensification of population, in the vicinity of such a facility, the change in societal risk needs to be taken into account</i> " appears not relevant to this proposal. Societal risk is assessed to address the societal concerns arising when there is a risk of multiple fatalities occurring in one event. Therefore, when the location of a potentially hazardous facility is likely to impose risk to a large number of population, a societal risk that considers the entire population should be carried out.	As there is no intensification of population within the vicinity of the facility, societal risk has not been assessed. The point discussing societal risk in Section 4.1 is included to explain why societal risk has not been assessed.
Additional issues raised by Department of Planning & Environment	
Some figures in the traffic assessment inconsistent with vehicle frequency numbers (vehicles per day) as per the SSD6917 approval.	The traffic assessment has been updated to correct any inconsistency (refer to Attachment 3)

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Construction jobs for Toyota [SIGMA ??]	The QS report has identified that 50 construction jobs will be created by the development.
Bicycle parking in the EIS but nothing shown in the plans	The Architectural Plans have been updated to show bicycle parking (refer to Attachment 4)
Signage for Sigma – no details included	Signage to be limited to direction signage only in line with Sigma’s operational and security requirements.
Northern boundary of landscaping 2.5m – sufficient landscaping?	The northern boundary landscaping is appropriate given the relative constraints of the site and the requirements for the location and size of the hardstand (refer to Options Analysis and layout options at Attachment 1 .
Palisade fencing – qualify set out of the fencing re: landscaping – recommend we move back	The location of the proposed fencing is consistent with this approach and as such considered to be acceptable in the context of the Stage 1 approval and site specific DCP controls.
Penrith City Council	
<u>Layout and Orientation</u>	
Concerns raised with orientation of the warehouses, the location of parking areas and loading docks as well as a reduction in land available for landscaping relative to the previously approved application.	<ul style="list-style-type: none"> • We note that these comments are site wide and that concerns relating to Precincts 4 and 5 are not applicable to this specific SSDA. • The site specific DCP to which the proposal generally complies allows for flexibility in design to account for tenant needs.



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	<ul style="list-style-type: none"> Options plans have been included at Attachment 1, which confirm testing of the alternate building layouts. These alternate layouts were also considered within the Options Analysis in Table 1.
<u>Setbacks</u>	
<p>The orientation towards the cul de sac at the end of Estate Road 4 shows little regard for any presentation to its frontage to Estate Road 1 and the remainder of Estate Road 4.</p> <p>The setbacks along Estate Roads 1 and 4 and for the eastern portion of Estate Road 6 should be increased to a minimum of 7.5m with landscaping amended to include shrubs and canopy trees.</p> <p>A 5m setback to Estate Road 4 and 2.5m setback to Estate Road 6 is contrary to the controls approved by SSD 6917. Given the building does not adequately address the street frontages and presents as a blank warehouse wall to Estate Roads 01, 04 and 06, a minimum 7.5m landscaped setback should be provided to these street frontages in accordance with the requirements of SSD 6917.</p>	<ul style="list-style-type: none"> The proposal provides the following compliant building setbacks to internal Estate Roads. <ul style="list-style-type: none"> 7.7m to Estate Road 4 7.5m to Estate Road 1, and 34m from proposed dock office to Estate Road 6. Canopy trees are not feasible due to the high surveillance measures, including cameras, required along the perimeter of the premises. It should however be noted that the street trees running along Estate Rd 1, 4 and 6 will provide acceptable levels of landscape screening along these frontages. The landscaping complies with the requirements of the approved site specific DCP controls of 50% of the building setback. The landscaping has been specifically selected by Sigma to reflect its operations and the level of security being proposed for the facility. Street planting along Estate Road 1, 4 & 6 consist of groups of native tree planting, including groups of shrubs with complementing groundcovers.

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	<p>This landscape treatment, approved under the Stage 1 Masterplan (SSD 6917), will over time provide effective screening and softening of the proposed built form. The approved street planting consists of the following:</p> <ul style="list-style-type: none"> - High level screening will be provided by groups of six (6) <i>Corymbia Maculata</i> trees, with a mature height of 15m and a width of 7m trees. (These trees are proposed along the entire frontage of Estate Road - Low level screening (i.e 1- 3 metres) will be provided by large groups of <i>Viburnum Ordoratissimum</i>, which will be planted across the extent of the boundary. - In addition to the above, a combination of <i>Pennisetum 'Nafray'</i>, <i>Gazania Tomentosa</i>, and <i>Trachelospermum Jasminoides</i> are proposed to ensure a green, and softened interface along the road frontages.
<u>Landscaping</u>	
<p>The area of ballast located at the north-eastern corner of the site presents poorly to the street (Estate Road 01). To avoid heat effects and poor streetscape presentation, this area should be landscaped with a range of native trees, shrubs and grasses. The use of ballast in such a large volume on a prominent corner of the site is not supported and is contrary to the Council's DCP 2014 in particular Chapter D4 Industrial Development.</p>	<ul style="list-style-type: none"> • Given that this area is currently zoned E2, it is Goodman's intention to submit a planning proposal rezone this portion of the site to IN1. The planning proposal is currently being prepared and will be submitted within three months of approval of the Section 96. Once the zone boundary is realigned a section 96 modification will be lodged to convert this area to operational hardstand.

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	<ul style="list-style-type: none"> Notwithstanding, this area has been shown as ballast on the plans as a temporary stabilisation measure prior to being converted into hardstand and therefore it is not considered reasonable to update the plans to show landscaping in this corner.
The car parking hard stand area is not provided with sufficient shade throwing canopy trees. Additional planting should be provided to the most western car parking row	Landscape plans have been updated to include additional trees along the Western row of car parking (Refer Attachment 5). These trees will provide additional shading and amenity to the car park.
Native canopy trees such as spotted or grey gums are to be provided along the eastern and southern elevations of the warehouse with frontage to Estate Roads 04 and 01.	The high surveillance requirements of Sigma mean that the provision of canopy trees along the eastern and southern boundaries is not feasible, however street planting as described above will be provided which will provide effective screening and softening of the eastern and southern elevations of the building.
A landscaped buffer should be provided along the front of the most eastern car parking row providing a landscaped buffer to the building and pedestrian way. A landscaped buffer should be provided between the central car parking rows.	<ul style="list-style-type: none"> A landscape buffer along the front of the most eastern car parking row would hinder pedestrian access and is not considered appropriate. It should be noted that the proposed landscaping for the car park is consistent with landscape treatment approved across Oakdale Central and South and is considered to provide good amenity and shading for users.
It is noted that tree and shrub species locations are not identified on the submitted landscape plans.	The Landscape Plans have been updated to include plant labels, as requested. Trees and planting will be selected in accordance with the schedules on the Landscape Cover Sheet DWG No. 000. Landscaping for these areas will ensure that appropriate shade throwing trees are selected

Matters Raised	Applicant consideration of matter/response
	whilst remaining consistent with the operational requirements for Sigma and the need to retain clear sight lines for site security cameras
<u>Built Form, Fencing and Retaining Walls</u>	
<p>The development should address the street frontages. It is preferred that main entryways and landscaped car parking fronts the public domain and street elevations providing articulated and activated elevations. In this respect, it is noted that the location of the office and primary entry point of the building is to the rear of the site and large expanses of unarticulated panelling present to Estate Roads 04 and 01.</p>	<p>SBA Architects have provided the following response justifying the proposed façade elevation treatment of the proposed Sigma building:</p> <ul style="list-style-type: none"> <i>Visitors and occupants of buildings at the Oakdale South Estate, arrive from the North and travel along Estate Road South 01. Due to the industrial nature of precinct, the size of building lots, distance between points of activation (entries and other points of public address), and provision of car parks within each separate Lot, it is not anticipated there will be significant pedestrian traffic along the frontage, and that views of the proposed Sigma Building will be predominantly from the vehicles along the roadways.</i> <i>There are not any predominant long range views to either the east or south facades (such as an overlooking district view). Views to the building will be predominantly, perhaps exclusively, from within the Oakdale South development Views to the South Elevation are restricted to within the view corridor between the proposed building and the building to the south (refer attached diagram). As such the predominant view line is local, from an access road, and from the eye height of the driver.</i>

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	<ul style="list-style-type: none"> • <i>Vehicles are moving at speed and as such this mitigates against the impact of mass or bulk. Visitors or occupants move quickly past each building.</i> • <i>With reference to the Overlooking View of the proposed development provided at Page 15 of the submitted Oakdale South Urban Design Report (Issue A), the key public view to the proposed Sigma Building is from further North (View 01), and this frontage is provided with extensive activation. This façade is the most prominent of the Sigma Building, to visitors and occupants of the Oakdale South Estate.</i> • <i>Views to the south and east facades of the Sigma Building will be oblique, along frontages, rather than perpendicular, looking directly at the frontage (Views 02 & 03). As such, the building mass will be significantly foreshortened by natural perspective. The Drawings show the building in elevation as this explains the scope and construction intent the most clearly, however of course, the building will appear in 3D form in reality.</i> • <i>Whilst in elevation, colour and material changes appear quite broad, as a consequence of this elevational flattening, in physical form, in three dimensions, with the effect of foreshortening, these colour and material changes will appear quite proximate, and in fact dynamic and interesting.</i> • <i>At speed, from a vehicle, these colour and material changes will quickly transition from the point of view of the Driver.</i>

Matters Raised	Applicant consideration of matter/response
	<ul style="list-style-type: none"> • Overall, the effect of the current design will be adequately dynamic and interesting for visitors and occupants of the site. • Additionally, street plantings, as specified in the submitted Landscape Documentation and Reports forming part of the Development Application (excerpt image below), will provide another layer of texture and relief to the façade, further diminishing the bulk impact and contrast to the scale and grace of the traditional warehouse form. This contrast, in combination with changes in material and colour, will be interesting and dynamic. • On this basis it is not suggested that any additional articulation, colour or pattern along the elevations of the Sigma Building will offer additional benefit to the presentation of the building.
<p>The eastern and southern elevations are provided with two layers of security fencing with minimal landscaping proposed. Whilst it is noted for security reasons that the external elevations of the warehouse must remain visible, the following amendments are sought to improve the streetscape presence of the site</p> <p>(a) High canopy native shrubs or trees such as Grey, Spotted or Red Gums are to be provided along the eastern and southern boundaries of the site.</p> <p>(b) External fencing with frontage to Estate Roads 01, 04 and 06 shall be located behind areas of landscaping within the front setback. Fencing should be a maximum height of 2.1 m and of an 'open' nature. Black</p>	<p>Due to the types of pharmaceutical products being stored at the facility, the proposal provides the optimum balance between landscaping and security to ensure clear sightlines and security can be maintained to the perimeter of the Site.</p> <p>(a) <i>Corymbia Maculata</i> street trees are proposed to be provided along the street frontage as described above, which will provide effective high level screening along the eastern and southern boundary.(b) The Stage 1 SSDA proposed palisade fencing along the internal estate roads and between each warehouse building proposed in that DA. The Department's assessment of the Stage 1 SSDA concluded that the</p>

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<p>palisade fencing has been established as the most common fence used along road frontages (behind the landscape setback)</p> <p>(c) Adequate access points and distance between the security fence and the external fence is to be provided, to allow for landscape maintenance</p>	<p>fencing proposed is compatible with the proposed landscape treatments and streetscape controls.</p> <p>(b) The location of the proposed fencing is consistent with this approach and as such considered to be acceptable in the context of the Stage 1 approval and site specific DCP controls. Street trees are included, which will provide appropriate screening.</p> <p>(c) Adequate access can be provided for landscape maintenance between the security fence and external fence to allow for landscape maintenance.</p>
<p>Large expanses of wall or building mass shall be broken up with the use of additional architectural treatments and significant and sustainable landscaping elements. The use of highly visible colours such as yellow and purple should be avoided on the northern and western elevations due to the potential impact on views from the surrounding rural areas.</p>	<ul style="list-style-type: none"> Given the minimal amount of signage proposed, the use of Sigma's corporate colours is appropriate and will provide visual enhancement to the proposed building facade. As described above, no additional architecture features are required as building elevations will be viewed from oblique angles and will be softened and screened by landscaping. The VIA submitted with the SSDA has adequately demonstrated that the site will not have unacceptable visual impact on surrounding land.
<p>Servicing requirements for the buildings such as sprinkler tanks and the like, should not be located within the front setback or be visible from public places. If forward of the building or visible from the public domain, these utilities shall be integrated with the building and landscaping design.</p>	<ul style="list-style-type: none"> The services are in the south west corner of the site and not located within the front setback, however are accessible in accordance with NSW Fire Brigades requirements to be near the water supply point in the street.

Matters Raised	Applicant consideration of matter/response
	<ul style="list-style-type: none"> The proposal has been architecturally designed to ensure that all portions of the building, including infrastructure such as water tanks and pump rooms, are integrated into the facility. Water tanks and plant rooms will be finished appropriately to form modern and attractive elements of the building rather than designed to be hidden or screened.
Any retaining walls visible from public places shall be stepped and contain suitable landscaping to soften their visual impact.	<ul style="list-style-type: none"> All retaining walls are located on private property and not visible from the public domain. All retaining walls will incorporate appropriate pedestrian and vehicular safety barriers in accordance with the either Austroads or the relevant Australian Standard. Slopes which have a gradient of 1:5 or less will be turfed. Slopes which have gradients steeper than 1:5 will be planted out with vegetation which does not require mowing.
<u>Height</u>	
In accordance with the consent SSD 6917 the building height shall not exceed 15m.	The proposed building is below 15m
<u>Signage</u>	
No details have been provided with regard to the location of proposed signage however it is noted that 1 x 4m high internally illuminated pylon sign	<ul style="list-style-type: none"> Noted - Signage is provided in accordance with Sigma's requirements and will be in accordance with Goodman's estate wide signage strategy

Matters Raised	Applicant consideration of matter/response
and 2 x wayfinding site signs are proposed. Internally illuminated signage shall be positioned such that nuisance glare is avoided.	<p>approved for both the Oakdale Central and South Estates. The estate wide signage strategy is necessary to provide adequate wayfinding, precinct, building and tenancy identification.</p> <ul style="list-style-type: none"> The signage will ensure that nuisance and glare is avoided.
<u>Traffic</u>	
The location of the security gates to the entryways off Estate Road 04, are to be located such that a B-Double type truck can fully enter the site prior to the gates being opened. Trucks should not block the cul-de-sac whilst awaiting entry to the site.	Noted
Car parks, aisles and manoeuvring areas shall be designed with function and safety in mind. Heavy vehicles should not have access to the general staff and visitor car parking area.	Noted - separate vehicle entry points and circulation roads to operational areas and staff/visitor parking areas have been provided.
<u>General</u>	
No storage areas should be located outside of the warehouse or within hardstand areas	Noted – no storage areas will be located outside of the warehouse or on the hardstand areas.
<u>Engineering</u>	
<ul style="list-style-type: none"> All civil engineering works shall be designed and constructed in accordance with Council's 'Design Guidelines for Engineering Works for 	<ul style="list-style-type: none"> Generally, all works have been designed in consultation with Penrith City Council (PCC) and their design specification along with the relevant Australian Standards.

Matters Raised	Applicant consideration of matter/response
<p>Subdivisions and Developments' and Council's 'Engineering Construction Specification for Civil Works'</p> <ul style="list-style-type: none"> All retaining walls shall have pedestrian and vehicular safety barriers in accordance with Austroads Guidelines and all batter slopes shall be a maximum of 1 in 5 (horizontal to vertical) to permit mowing. Any batter slope steeper than 1 in 5 shall be vegetated The use of any public road within the Penrith LGA as a haul road for the purposes of importation of fill into the estate shall be approved by Penrith City Council. An application is to be made to Penrith City Council for approval of the haul road route prior to the commencement of fill operations 	<ul style="list-style-type: none"> All retaining walls will incorporate appropriate pedestrian and vehicular safety barriers in accordance with the either Austroads or the relevant Australian Standard. It is not intended to use any PCC local road as a Haul Road to import material to the site.
<p><u>Water Sensitive Urban Design</u></p> <ul style="list-style-type: none"> A condition of consent is recommended to require the development to include a CDS 2028 uni as indicated in the MUSIC Screen shot included in the Stormwater Management Strategy (Appendix D of the EIS). The report indicates that only 50.3% of non-potable water will be used from the tank. In this regard, Council's WSUD Policy has a target of 80%. As such, it is recommended that additional storage should be provided to ensure the demand is consistent with Council's requirements. 	<ul style="list-style-type: none"> The Music modelling undertaken in developing the overall stormwater scheme for the development included GPT's to be located on most downstream point of the stormwater network. The aim of the unit is to capture Gross Pollutants. Modelling was also undertaken using <i>Enviropods</i> within each inlet pit. The resultant Music model demonstrated either option met the targeted guideline reductions. At detailed design and prior to CC, a final Music model will be prepared and submitted to the PCA for final signoff.

Matters Raised	Applicant consideration of matter/response
<ul style="list-style-type: none"> It is recommended that the Department include a condition of consent requiring an OEMP and to ensure that there is ongoing cleaning and maintenance of the devices. A condition of consent should be imposed which requires that the WSUD measures be operated and maintained in perpetuity to the satisfaction of Council in accordance with the final Operation and Maintenance Management Plan. Regular inspection records should be required to be maintained and made immediately upon awareness of any deficiencies in the treatment Council requires that a restriction as to user and positive covenant relating to the stormwater management systems (including on-site detention and water sensitive urban design) be registered on the title of the property. The restriction as to user and positive covenant shall be in Penrith City Council's standard wording as detailed in Penrith City Council's Stormwater Drainage for Building Developments Policy 	<ul style="list-style-type: none"> Rainwater tanks proposed are consistent with the Overall site SSD and stormwater management plan approval. It would usual for OEMP be prepared for each of the basins and devices installed across the development site. Ordinarily this would be in place prior to OC. The mentioned OEMP would incorporate a OMP.
<u>Environmental Health - Land Contamination</u>	
No additional assessments necessary for this application, applicant has committed to implementing an Unexpected Finds Protocol during works on the site.	Noted

Matters Raised	Applicant consideration of matter/response
<p><u>Environmental Health – Noise Impact</u></p> <p>The noise associated with the plant and equipment used on site, or the loading and unloading activities have not been addressed. Although it is recognised that the warehouse is located a significant distance from sensitive receivers, the SEAR required that all noise sources be addressed.</p>	<p>Similar to the S.96 Masterplan noise impact assessment, loading and unloading as well as plant and equipment have been assessed in the Sigma noise assessment.</p> <p>In addition to light and heavy vehicle movements on the estate roads and within the Sigma site, loading activities are modelled in the hardstand area including gas powered forklift operations, heavy vehicle manoeuvring and maximum noise sources such as heavy vehicle air brake releases.</p> <p>The following sound power levels (SWLs) have been modelled for these sources:</p> <ul style="list-style-type: none"> • Light vehicle movements: 96 dBA • Heavy vehicle movements: 106 dBA • Gas powered forklifts: 93 dBA • Heavy vehicle air brake release: 115 dBA LAMAX <p>The exact models of fixed plant and their locations are not yet known, so a cumulative SWL of 100 dBA for all external plant on the Sigma site and conservative equipment placement (ie rooftop locations) have been modelled. These noise sources are included in the predicted results discussed in the noise impact assessment.</p>



Matters Raised	Applicant consideration of matter/response
<p><u>ENVIRONMENTAL HEALTH - SEPP 33</u></p> <p>The recommendations of the PHA should be incorporated into the conditions of the approval including that:</p> <ul style="list-style-type: none"> (a) Multiple spill kits should be provided around the DG store to ensure spills can be cleaned up immediately following identification; and (b) The site emergency plan should include response to spills and spill clean-up procedures. 	<p>Noted</p>
<p>It is requested that any mitigation measures recommended as part of the submitted technical reports appended to the EIS, are incorporated into the conditions of the approval.</p>	<p>Mitigation measures were recommended as part of the submitted technical reports will be incorporated into the site OEMP.</p>
<p>Water NSW</p> <p>It is noted that on-site stormwater infrastructure will be connected to estate-wide infrastructure delivered under the approved Concept Proposal Stage 1 SSDA, and that post-development flows will remain 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.</p> <p>This is supported by WaterNSW with no further comment on the application.</p>	<p>Noted no formal response required.</p>



Matters Raised	Applicant consideration of matter/response
<p>TransGrid</p> <p>TransGrid has reviewed this development application and determined that the proposed development is conditionally acceptable subject to the provisions within the letter however noting that the development is entirely within (Precinct 3, Site 3A) which is outside of our easement corridor.</p> <p>Transgrid has requests the development comply with conditions relating to the protection of its assets within the easement.</p>	<p>Noted the proposal will ensure that the development will not impact upon the Transmission easement and comply with the relevant requirements relating to this application.</p> <p>Noted.</p>
<p>Roads and Maritime</p> <p>Roads and Maritime has reviewed the submitted documentation and raises no objection to the proposed application.</p>	<p>Noted – no response required</p>
<p>Office of Environment and Heritage</p> <p>After reviewing the relevant documents, OEH's Greater Sydney Planning Team has concluded that both matters do not contain biodiversity, natural hazards or Aboriginal cultural heritage issues that require a formal OEH response. We have no further need to be involved in the assessment of these projects.</p>	<p>Noted – no response required</p>
<p>Heritage Council of NSW</p> <p>Toyota Spare Parts Warehouse and Distribution Centre is located within the same Lot as the proposed Sigma Pharmaceutical Facility Distribution and Warehouse and Distribution Facility (SSD 7719) to the south of the remains</p>	<p>Noted – no formal response required.</p>



Matters Raised	Applicant consideration of matter/response
<p>associated with the Lochwood Estate identified during archaeological testing (Artefact Heritage 2015) and there will be no additional impacts than have been assessed already.</p> <p>Within the EIS for this site there is no independent Heritage report and it relies on a report prepared by Artefact Heritage for the adjacent site (SSD 7663), undated. As there are two SSDs for consideration, each should have an assessment of the SEARs within their respective EIS.</p>	
<p>Environment Protection Authority</p> <p>On the basis of the information provided, the proposal does not constitute a Scheduled Activity under Schedule 1 of the Protection of the Environment Operations Act 1997 (PoEO Act). The EPA does not consider that the proposal will require an Environment Protection Licence (EPL) under the PoEO Act. Accordingly, the EPA has no comments regarding the proposal and has no further interest in this proposal.</p>	<p>Noted – no formal response required.</p>
<p>Department of Primary Industries</p> <p>As the orientation and layout of the proposed Sigma site reflects the layout as proposed by the SSD-6917 (MOD 1), the issues raised by DPI in its submission on the MOD 1 proposal, which relate to the Ropes Creek tributary, should be addressed prior to any approval being granted for SSD-7719, where relevant to this project.</p>	<p>Noted – no formal response required.</p>

Matters Raised	Applicant consideration of matter/response
<p>Transport for NSW</p> <p>Transport for NSW has reviewed the documentation presented in support of the Development Application and has no further comment.</p>	<p>Noted – no formal response required</p>
<p>Endeavour Energy</p>	
<p>From an electricity distribution networks perspective, Endeavour Energy's recommendations and comments in relation to the supply of electricity to the individual developments / sites are as follows:</p>	
<ul style="list-style-type: none"> - The applicant for the future proposed development of the sites will need to submit an application for connection of load via Endeavour Energy's Network Connections Branch to carry out the final load assessment and the method of supply will be determined. 	<p>Noted – no formal response required</p>
<p>Any future proposed buildings, structures, etc. must comply with the minimum safe distances / clearances for voltages up to and including 132,000 volts (132kV) as specified in AS/NZS 7000:2010 'Overhead line design - Detailed procedures' and the 'Service and Installation Rules of NSW'.</p>	<p>Noted, applicant will submit for connection when required.</p>
<ul style="list-style-type: none"> - The construction of any building or structure (including fencing) that is connected to or in close proximity to Endeavour Energy's electrical network is required to comply with AS/NZS 3000:2007 'Electrical installations' to ensure that there is adequate connection to the earth. 	<p>Noted - proposed buildings will comply with the minimum safe distances.</p>

Matters Raised	Applicant consideration of matter/response
<ul style="list-style-type: none"> - Before commencing any underground activity the applicant is required to obtain advice from the Dial before You Dig 1100 service in accordance with the requirements of the Electricity Supply Act 1995 (NSW) and associated Regulations. 	Noted proposed development to comply with the relevant Australian Standards.
<ul style="list-style-type: none"> - Workers involved in work near electricity infrastructure run the risk of receiving an electric shock and causing substantial damage to plant and equipment. Endeavour Energy's public safety training resources, which were developed to help general public / workers to understand why they may be at risk and what you can do to work safely should be understood. 	Noted.
<ul style="list-style-type: none"> - In case of an emergency relating to Endeavour Energy's electrical network, the applicant should note Emergencies Telephone is 131 003 which can be contact 24 hours/7 days. 	Noted – no formal response required
NSW Fire and Rescue	
<p>The development site appears to have adequate measures in place to mitigate the risk of significant fire spar throughout the site through vegetation management in a manner compliant with the requirements stated in <i>Planning for Bushfire Protection 2000</i>. Additionally, the site is described as having a water supply for firefighting operations which is compliant with Australian Standards. Access into and around the property for the purposes of firefighting appears to meet the requirements of <i>Planning for Bushfire Protection 2000</i>.</p>	Noted – no formal response required

Matters Raised	Applicant consideration of matter/response
<p>At this stage of the development proposal, detailed information relating to critical measures such as required fire services, fire water supply and fire water containment which are specific to the subject development are relatively limited. Therefore, FRNSW does not offer any comment at this stage of the development application.</p>	<p>Noted – no formal response required at this stage.</p>
<p>Given that the proposed development application will be subject to all relevant Legislative, National Construction Code and Other Department of Planning instrument requirements, FRNSW does not object to the proposal.</p>	<p>Noted – no formal response required</p>
<p>NSW Rural Fire Service</p>	
<p><u>Water and Utilities</u></p> <p>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.</p> <p><i>1. Water, electricity and gas are to comply with section 4.1.3 of Planning for Bush Fire Protection 2006.</i></p>	<p>Noted. No objection to suggestion.</p>
<p><u>Access</u></p> <p>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.</p>	<p>Noted. No objection to this recommendation.</p>

Matters Raised	Applicant consideration of matter/response
<p>2. <i>Public road access shall comply with section 4.1.3 (1) of Planning for Bush Fire Protection 2006.</i></p>	
<p>Evacuation and Emergency Planning</p> <p>The intent of the measures is to provide suitable emergency and evacuation (and relocation) arrangements for occupants of special fire protection purpose developments.</p> <p>3. <i>A Bush Fire Emergency Evacuation Plan shall be prepared that complies with section 4.2. 7 of Planning for Bush Fire Protection 2006</i></p>	<p>Noted. No objection to recommendation.</p>
<p><u>Design and Construction</u></p> <p><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></p> <p>4. <i>New construction of the northern and western elevation(s) and roof of building 3A shall comply with Section 3 and Section 6 (BAL 19) Australian Standard AS3959-2009 Construction of buildings in bush fire-prone areas and Section A3. 7 Addendum Appendix 3 of Planning for Bush Fire Protection 2006.</i></p>	<p>Noted. No objection to recommendation.</p>
<p>5. <i>New construction of the eastern and southern elevation(s) of buildings 3A shall comply Section 3 and Section 5 (BAL 12.5) Australian Standard AS3959-2009 Construction of buildings in bush fire-prone areas and Section A3. 7 Addendum Appendix 3 of Planning for Bush Fire Protection 2006.</i></p>	<p>Noted. No objection to recommendation.</p>

CONCLUSION

We have considered the comments received in relation to the subject SSDA. All comments provided in relation to this SSDA have been addressed, considering the specific operational requirements of Sigma.

The proposed built form is consistent with other warehouse developments within the Oakdale Estate and other similar industrial estates. We note that there are significant limitations on providing a varied approach to the built form due to the specific warehouse typologies required for the operations of the end users. The proposal is consistent with the approved Concept and Stage 1 SSD approval 6917 and the proposed Section 96 modification currently being assessed by DPE which establishes the overall use of the precinct for warehouse and distribution purposes.

The proposed development of Site 3A for Sigma for the warehousing, storage and distribution of its pharmaceutical products, including prescription and over-the-counter medicines, FMCG and general merchandise products will result in a productive and appropriate development which integrates into the surrounding WSEA with acceptable impacts on surrounding lands. Any potential impacts can be reasonably mitigated, thus avoiding any unreasonable impact on amenity of surrounding residential areas, useability of surrounding sites, and environment.

The proposal will generate:

- 41,562 sqm of warehouse, distribution and office floorspace to meet specific operational demands of Sigma
- 50 construction jobs and 166 operational jobs;
- \$61.6 million of direct investment by Sigma in undertaking the proposed development.

The proposal is consistent with the strategic objectives of the Western Sydney Employment Area and a *A Plan for Growing Sydney*. The delivery of Badgerys Creek Airport will permanently alter the land use pattern of the Broader WSEA, through changes to the surrounding environment in terms of noise, traffic and air quality. The changing context of the OSE reinforces its role as a critical component of a strategically important employment hub, serving the direct and indirect needs of the growing Western Sydney region, including the future proposed airport at Badgerys Creek.

The proposed development for a Sigma Warehouse and Distribution centre is wholly consistent with the broader strategic framework for the locality and broader WSEA area and as such should be favourably supported by the Department of Planning and Environment.

Yours sincerely,



Christophe Charkos
Senior Consultant



ATTACHMENT 1 - OPTIONS LAYOUT PLANS



ATTACHMENT 2 – EXAMPLES OF HARDSTAND ON STREET FRONTAGES



ATTACHMENT 3 – REVISED TRAFFIC IMPACT ASSESSMENT



ATTACHMENT 4 – REVISED ARCHITECTURAL PLANS



ATTACHMENT 5 – UPDATED LANDSCAPE PLANS