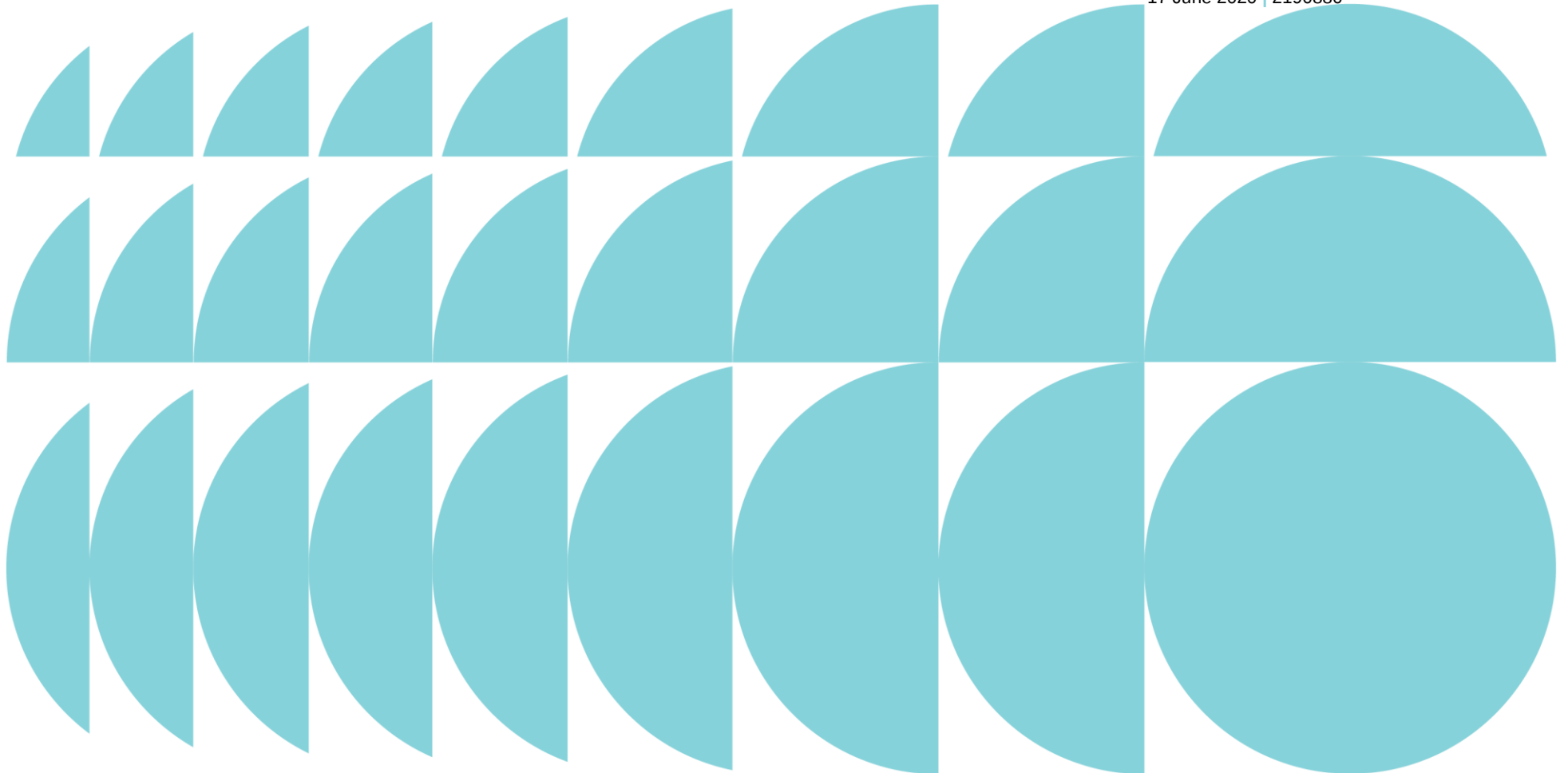


Attachment A 7664 MOD 1 Response to Submissions

Horsley Drive Business Park Stage 2
Section 4.55(2) Modification Application

Submitted to Department of Planning &
Environment
On behalf of Charter Hall

17 June 2020 | 2190880



1.0 Introduction

The proponent, Charter Hall and its specialist consultant team have reviewed and considered all issues raised, as detailed within the table below.

This response provides a detailed response to the issues raised and outlines any proposed amendments to the exhibited Environmental Impact Statement.

As outlined within below, we are of the view that there are no further issues precluding the Department from finalising its assessment and that the proposal should be recommended for approval.

2.0 List of Abbreviations

CEMP	Construction Environmental Management Plan
DPE	Department of Planning and Environment
EIS	Environmental Impact Statement prepared for SSD 7664
EP&A Act	Environmental Planning and Assessment Act 1979 (NSW)
EPA	Environment Protection Authority of NSW
OEH	Office of Environment and Heritage
SSD	State significant development under the EP&A Act

3.0 Detailed Response to Submissions Table

Issues Raised by Agencies and Organisations	Proponent's Response
Department of Planning & Environment	
Inconsistencies	
- There are a number of inconsistencies within the Section 4.55(2) Modification Report and specialist reports – for instance: - Table 2 states that there will be a “reduction in the access road area from 5,371m² to 7,371m²”; and - Section 6.7 of the Modification Report states that 36 ecosystem credits are required (down from the approved 39 ecosystem credits) yet the Biodiversity Development Assessment Report only addresses the additional impact and the need for one additional ecosystem credit. The BDAR makes no reference to most of the information attributed to it in the Modification Report. This shall require detailed revision.	- The applicant acknowledges that there is a wording error in Table 2. Table 2 should read “<i>There will be an increase in the access road area from 5,371m² (approved) to 7,371m² (proposed).</i>” - Section 6.7 of the Modification Application erroneously states that 36 credits are required as a result of the development. - SSDA 7664 was approved with an impact to 1.09 hectares of native vegetation, and the FBA assessment identified a requirement to retire 39 BioBanking ecosystem credits (30 for 0.76 ha PCT 850 and 9 for 0.33 ha of PCT 835). These BBAM credits are currently being purchased and retired. - The subject site for the current BDAR covers an additional area of 2.92 ha outside the previously approved SSD 7764 land, with the clearing of 0.015 ha of PCT 835 requiring one (1) BAM ecosystem credit. - Please refer to the Biodiversity Assessment Report Addendum Letter provided at Appendix H.
Site Layout	
An amended site plan which clearly illustrates for example existing lot boundaries, topographic contours, lot sizes, building envelopes, easements, existing infrastructure.	- An amended site plan is attached at Appendix B that correctly identifies all relevant lots that formed the site area under the Concept Approval for SSD 7664. - The lot boundaries, building envelopes and existing infrastructure are all clearly shown on the Overall Site Plan (DA02). - To ensure the retention of clarity on the site plan, the topographic contours are detailed within the civil drawings (DA20) prepared by Costin Roe and submitted with the Modification Application.
Confirm if lot consolidation is being sought under SSD 7664 MOD 1. If so, the amended site plan should reflect this and a plan of consolidation, provided.	- Lot consolidation is being sought under SSDA 7664 & SSD 7664 MOD 1. - Please refer to the subdivision plan submitted with the Modification Application. - The overall site plan (DA02) prepared by Leffler Simes Architects has been amended to reflect this consolidation (Appendix B).
Technical Studies and other information	
Confirm whether site access and amendments to Cowpasture Road and Trivet Street are being sought under SSD-10404 or SSD 7664 Modification 1.	SSD 7664 Modification 1 will modify the approved access arrangement from Cowpasture Road to Trivet Street. The amended drawings at Appendix B reflect the latest site access arrangements and this proposed access configuration has been assessed accordingly within updated Transport Assessment prepared by ASON Group submitted at Appendix D.
Engineering section plans provided should be amended to show approved cut / fill levels and not just as proposed.	Please refer to the revised Engineering Section plans by Costin Roe attached at Appendix C.

Issues Raised by Agencies and Organisations	Proponent's Response
Table 5 should be amended to detail existing lots and sizes.	As outlined within the SSD 7664 MOD 1 Response to Submissions Report, Table 5 of the Statement of Environmental Effects has been updated to clearly identified the approved lots under the Concept Approval (as per SSD 7664) and the proposed lots and sizes sought under MOD 1.
It is unclear how in Section 6.4.1, Warehouse 1 with a gross floor area (GFA) of 29,652m² requires 538 car parking spaces, yet Warehouses 3 and 4 with a combined GFA of 30,390m² is provided with only 134 car parking spaces. The rationale of this should be explained further.	- Table 13 of the TIA shows the parking rates for 'Warehouses 3 and 4' (hereafter referred to a proposed Warehouse 1 (WH1) and proposed Warehouse 2 (WH2)) are 68 spaces and 66 spaces, respectively. - These parking provisions have been provided in accordance with the requirements of the approved parking rates for the HDBP Stage 2 as follows: 1 space for every 300m² of warehouse GFA. 1 space for every 40m² for all office and ancillary GFA. - The parking requirement for the CFC, 'Warehouse 1', considers the number of staff to be located on the site and staff shift changeover to ensure no impact to the operation of the external network during these periods. - Whilst the parking demands associated with the CFC Facility are subject to a separate application (SSD 10404), the TIA identifies a peak of 506 shift worker light vehicles being on-site at any one time. A total of 538 spaces are proposed for the CFC. The remaining 32 spaces will be available to accommodate office staff vehicles and any visitors. - It is noted that proposed warehouses in the northern portion of the site will be subject to separate future application to prepare traffic and car parking analysis associated with their future use however it should be noted that these warehouses are intended to operate as more traditional warehouse buildings whereby the provision of 1 space per 300m² is entirely appropriate to the associated demands of the end user. - The CFC Facility (subject to a separate application SSD 10404) has entirely different user needs in relation to parking demand and should not serve as a guide to the parking demands associated with the future use of Warehouses 3 and 4. Based on the identified GFA for Warehouses 3 and 4 and the approved parking rates for HDBP Stage 2 (as per Concept Approval SSD 7664), the northern warehouses (subject to separate future application) are capable of compliance. - Please refer to the updated Traffic Assessment Report at Appendix D.
Fairfield City Council	
Planning Report Inconsistency	
The planning report prepared by Ethos Urban dated 27 March 2020, has a number of inconsistencies. There appears to be track changes in red throughout the document. It is unclear whether the changes are intentional or the document is still in the final stages of edit. Council officers would request these edits be finalised and resubmitted to Council for review.	- The proposed modifications require amendments to the term of consent for the concept development. - Section 4.2 of the planning report identifies the required modifications to conditions. - Words proposed to be deleted are shown in bold strike through and words to be inserted are shown in bold italics. - These have been highlighted intentionally to assist the department in its assessment.

Issues Raised by Agencies and Organisations	Proponent's Response
Landscaping Requirements	
<i>The conditions of consent for SSD 7664 required a landscape setback of 10-metres to Cowpasture Road and a 7.5-metre landscape setback to the proposed access road.</i> <i>In addition to this, the consent required a planter bed for every 10-car parking spaces and retaining walls over 3 metres to be stepped.</i> <i>The new concept plan for SSD 7664 Mod 1 shows a landscape setback greater than 10 metres to Cowpasture Road. The landscape setback to the northern edge of the new internal road includes a 10-metre wide overland flow path and drainage easement with landscaping plantings; this also acts as a suitable landscaping setback to the northern side of the new internal road.</i> <i>The southern portion of the new access road includes a 5-metre wide overland flow path and easement that will be fully landscaped. This acts as a landscaping setback to the southern industrial lots. This is non-compliant with conditions of consent for SSD 7664.</i> <i>It is unclear how many planter beds have been provided in the amended design, however a condition requiring 1 planter box per 10 car parking spaces still applies to the development. As the amended design increases, the number of on-site car parking spaces to 672 there will be 67 planter boxes required onsite.</i>	• As demonstrated on the architectural drawings submitted with the MOD 1 application as well as the amended architectural drawings, a landscape setback of 10-metres to Cowpasture Road and a 7.5-metres landscape setback to the proposed access road has been provided in accordance with the conditions of consent under the Concept Approval SSD 7664. • It should be noted that the Development Consent issued in relation to Concept Approval SSD 7664 does not specifically require a 'planter bed for every 10-car parking spaced and retaining walls over 3 metres to be stepped'. • As outlined with the Concept Approval EIS Detailed Design Guidelines, it states that '<i>island planting beds should be interspersed throughout large parking areas, with appropriate species and scale tree planting</i>'. Planter beds were not detailed within the approved Landscape Drawings prepared by Arcadia Landscape Architects as approved under the Concept Approval. • Notwithstanding the above, as detailed within the Architectural Drawings submitted with MOD 1 and as amended as part of the Response to Submissions, the northern warehouses have nominated planter beds (WH1- 6 planter beds and WH2 – 4 planter beds). • It is considered that Fairfield City Council's recommendation of 67 planter boxes required onsite is an unreasonable requirement under the circumstances of an industrial warehouse car park. In consultation with Charter Hall, Leffler Simes Architects and Geoscapes Landscape Architects, the provision of planter beds for WH1 and WH2 within the car parking areas fronting the internal access roads is a reasonable condition (subject to detailed design as part of a separate application) however in the context of the CFC Facility in the southern portion of the site and the associated parking arrangements (subject to a separate application) provision of planter beds is not functional or feasible. • Rather than a set numeric rate for the provision of planter boxes, it is considered that it is more appropriate for the landscaping of car parking areas and the wider site to be guided by the landscape concept plan submitted with MOD 1 and future detailed applications submitted in relation to both WH1, WH2 and the CFC Facility. • It is noted that the primary driver for planter boxes is to soften expansive hard stand area and provide shading opportunities which can be achieved through detailed landscape design for each future application. • The overall catchments draining to upstream catchments and diversion paths remain consistent with documents approved under SSD 7664. A 7.5 metre overland flow path is detailed on the Costin Roe Civil Drawing submitted with the Modification Application as shown on Drawing DA41 and is entirely consistent with the approved landscaping setback to the southern industrial lot. • As demonstrated on Civil Drawing EW61-C (Retaining Wall Plan and Elevations) prepared by Costin Roe and submitted at Appendix C, the Modification complies with the requirement for retaining walls visible from the public domain over 3 metres to be stepped.
Biodiversity Assessment Development Report (BDAR)	
<i>The approval issued for SSD 7664 included a condition of consent to require the applicant to purchase and retire 38 ecosystem credits to offset the removal of native</i>	• Section 6.7 of the Modification Application erroneously states that 36 credits are required as a result of the development.

Issues Raised by Agencies and Organisations	Proponent's Response
vegetation on site. The ecosystem credits shall be determined in accordance with the OEH's Frameworks for Biodiversity Assessment (FBA) and the Bio-banking Assessment Methodology 2014 (BBAM). As indicated in the BDAR report prepared by Ecological 07/04/2020, there is an additional area of 2.92 ha outside the previously approved SSD 7764 land. Ecological undertook a full-floristic vegetation survey to identify Plant Community Types (PCTs) and Threatened Ecological Communities (TECs) on the broader development site. Integrity survey plots were undertaken on the broader development site to assess the composition, structure and function components of each vegetation zone in accordance with the BAM. 0.015 ha of Forest Red Gum - Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin Bioregion (PCT 835) will be removed from the subject site by the proposed development. The impacts of removal of this vegetation requires one (1) ecosystem credit. In light of the above, Council's Natural Resources section recommends the following: 1. The proponent clarify the issues in regards to the extent of ecosystem credits required to offset the removal of native vegetation on site as there appears to be some inconsistencies between the BDAR and Planning Report and the original Concept Plan approved by the Minister of Planning on 9 November 2017. 2. Implement Mitigation Measures and Risk Assessment as outlined in tables 19, 20, 21, 22 & 23. On pages 44-48 of BDAR Report. 3. The Plant Schedule needs to be revised to represent locally endemic species. Natural Resources recommends the use of <i>Brachichiton aceriton</i> and <i>Lomandra longifolia</i> 'Tanika' replaced with a local species.	• The Concept Appr=oval (SSDA 7664) was approved with an impact to 1.09 hectares of native vegetation, and the FBA assessment identified a requirement to retire 39 BioBanking ecosystem credits (30 for 0.76 ha PCT 850 and 9 for 0.33 ha of PCT 835). • These BBAM credits are currently being purchased and retired. • The subject site for the current BDAR covers an additional area of 2.92 ha outside the previously approved SSD 7764 land, with the clearing of 0.015 ha of PCT 835 requiring one (1) BAM ecosystem credit. • Please refer to the Biodiversity Assessment Report Addendum Letter provided at Appendix B. • Mitigation Measures and Risk Assessment measures for the additional clearing outlined in the BDAR Report will be implemented as part of the development and can appropriately form a condition of the MOD 1 Conditions of Consent. • Geoscapes Landscape Architects have prepared a Concept Landscape Plan in support of the proposed Modification that provides a detailed planting schedule including a number of local endemic species (as provided at Appendix F). • The plant schedule and plans have been amended to reflect the provision of locally endemic species. The species <i>Brachichiton acerifolius</i> has been replaced by <i>Corymbia maculata</i>. The species <i>Lomandra longifolia</i> 'Tanika' has been omitted from the proposed list of species.
Traffic	
The development application shall be referred to Transport for NSW (formerly the Roads and Maritime Services) for review and comments. Any issues raised by Transport for NSW shall be satisfactorily addressed and any conditions set by them shall be complied with.	• Comments from Transport for NSW with regard to the application have been received and addressed.
The proposed parking rate of 1 space for every 300m² of warehouses of GFA shall be justified and clarification is required regarding this matter. This parking rate shall be consistent with the parking rate which is adopted for Horsley Drive (HDBP) Stage 1 for the warehouse development.	• The approved car parking rate of 1 car space for every 300m² GFA for the HDBP Stage 2 has been adopted as this is rate that is applicable to the Site under the approved Concept Plan. • Therefore, adoption of this rate for the northern warehouses for this Modification Application is consistent with the previously approved SSDA 7664 parking rates (refer Appendix E – Traffic Assessment).
The traffic generation rates for calculating the traffic generation by the proposed development shall be based on the RMS Guide to traffic generating developments updated traffic surveys (TDT 2013/04a). In this instance, the applicant has estimated	• The traffic generation and applicable rates associated with the Customer Fulfilment Centre (CFC) are the subject of a separate application (SSD 10404) and are more appropriately assessed as part of the separate application.

Issues Raised by Agencies and Organisations	Proponent's Response
<i>the traffic generation for the Customer Fulfilment Centre (CFC) based on the known operational data of a similar facility.</i> <i>It is also mentioned that the applicant has provided Ason Group with their delivery vehicle data from a similar facility located in Australia. Additional information shall be provided in regard to where the operational data are obtained from.</i>	
<i>Cowpasture Road, between Victoria Street and Newton Road is classified as a collector road under Council's road hierarchy. The subject development is expected to generate approximately 3,225 vehicles per day which is considered to have significant impacts on the adjoining road network. SIDRA intersection files (electronic copy of the files) showing the analysis of the potential traffic impacts of the development proposal on adjoining road network (key intersections in the locality) under the existing and forecasted conditions shall be submitted to Council for assessment. In addition, the applicant shall investigate the feasibility of widening Cowpasture Road at/near the site and this information shall be provided to Council.</i>	• As demonstrated within the amended Traffic Assessment prepared by ASON Group and submitted at Appendix E, the approved HDBP Stage 2 (SSD 7664) has an accepted traffic generation threshold of 1,863 vehicle movements per day. The proposed Modifications to the Concept Approval represents an increase in vehicle movements per day of 1,362 vehicles, which equates to an average of 7 vehicle movements per hour (29 in/28 out). • This volume of additional traffic above that already approved would not materially impact capacity of Cowpasture Road in vicinity of the site. Nevertheless, a mid-block capacity assessment of Cowpasture Road has been undertaken by ASON Group to demonstrate the impact of the proposed modifications on capacity along Cowpasture Road between Victoria Street and Newton Road. • As outlined in the Traffic Assessment, the increased traffic flows per hour are found to be acceptable under the mid-block assessment.
<i>The applicant shall justify that the sight distance requirement for commercial vehicles entering and exiting from the Estate Road complies with Figure 3.3 of AS 2890.2:2018.</i>	• Sight distance for the commercial vehicle exit driveways on the Estate Road has adequate sight distance requirements of 69m which equates to a minimum 5s gap for a 50km/hr road as per AS2890.2:2018 Figure 3.3. Please refer Appendix E – Traffic Assessment.
The provision of warehouses on the northern lot	
<i>The submitted architectural plans shall indicate the dimensions of the proposed vehicle accesses, internal access road width, loading bays/hardstand areas, line markings (to clarify the extent of the loading area and the direction of travel) car parking and disabled spaces and ramp grades to and from various parking and loading areas of the site. This information shall be submitted to Council for assessment.</i>	• This application relates to the modification of a Concept Plan Approval (SSD 7664). • Detailed information in relation to vehicle accesses, internal access road width, line marking, loading bays/hardstand areas, etc would be considered as part of future detailed applications for the individual warehouses.
<i>Concerns are raised regarding the number and the spacing of the driveways proposed for the warehouses. The potential conflicts between vehicles and heavy vehicles entering and exiting the site shall be addressed.</i>	• As outlined within the amended Traffic Assessment prepared by ASON Group and submitted at Appendix E, the concerns for the close proximity of the driveways are noted, however, Lot 1 & 2's warehouse heavy vehicle traffic generation for each of the truck exit/ entry driveway would have a peak of 5 trucks per hour. The carpark driveways would each have around 18-21 vehicles entering and exiting during the peak hour. The number of car trips would be focused around the commuter peak s of 7-9am and 4-6pm reducing the conflicts between heavy and light vehicles. • There is expected to below traffic generation across each of the Lot 2 and 3 driveways, minimising interactions between light and heavy vehicles. • Each driveway has clear sight distances along the Estate Road allowing drivers to undertake safe turning movements in and out of the driveways.

Issues Raised by Agencies and Organisations	Proponent's Response
	• Lot 2 and Lot 3 warehouse plans are currently concept plans with no set tenants. It is planned that separate SSDAs will be submitted in the future for each of the lots which may alter the proposed design. As such, the driveway locations are still subject to change in the future. • The access driveways off the Estate Road are proposed in a similar manner to that delivered on Burilda Close (HDBP Stage1) and therefore, for the purposes of the Concept Plan, are considered to be acceptable.
<i>Architectural plans show that traffic signal system is to be proposed to manage one-way traffic flow within the site. Council has not approved the use of traffic signal system within the development site in Fairfield Local Government Area. Additional information shall be provided to Council how the potential conflicts between vehicles will be managed within the site in the event of a power failure or when traffic signal system/lift system is malfunctioning. In this instance, the applicant shall demonstrate that the proposed system would not adversely affect the safe, efficient and effective use of the site.</i>	• As above, the detailed design and operational characteristics of the individual warehouses would be subject to individual separate future applications. • For the purposes of consideration of the Concept Plan, it is clear that an appropriate management solution could be implemented to manage one-way flow within the internal workings of the Site. • This would include an Operational Management Plan for each Lot to be drafted during the Construction Certificate stage, detailing how heavy vehicles would operate within the Site. • With specific regard to Lot 3's proposed traffic signal system, the operational management plan would require signages along the access road to stop at the signal line and contact the warehouse management in the event of a signal failure. The site management would provide a traffic controller to coordinate movements around the corner until the signal system is repaired. Mirrors and line marking will be provided. • Based on the low traffic generating nature of traditional warehouse developments, the signal system is entirely appropriate and facilitates the ultimate utilisation of the spaces within the Lot. • When the detailed application is commenced for this Lot, the end user would be better understood, the application would reflect the appropriate layout accordingly.
<i>Considering the number of trucks and delivery vehicles which are expected to service the site on a daily basis, a loading dock management plan is required. The loading dock management plan is to ensure that trucks will be accommodated within the site without impacting traffic flow into, within and out of the site. Additional measures may be required to prevent additional trucks or commercial vehicles from entering the site when all of the loading bays are occupied.</i>	• As above, this Modification relates to a Concept Plan approval (SSD 7664). • Consideration to loading dock management should be detailed in an Operational Management Plan which should form part of a Condition of Consent for the Occupation Certificate relating to the individual buildings.
<i>Information on the plans shows that loading bays at/near the north-western and south-eastern corners of Lot 2 will be clear to allow a B-Double vehicle turn. Additional information shall be provided to Council for clarification</i>	• This will be managed as part of the Operational Management Plan for the individual Lots, which would be expected to be implemented as part of Conditions of Consent. • A booking system would be implemented and managed by the respective Site Managers.
<i>No other information is provided regarding the provision of designated loading bays for 26m B-Double vehicles to service the site. Service vehicles shall only undertake loading and unloading activities from the designated loading areas and shall not obstruct the car parking areas and traffic flow within the site. Further information shall be provided to Council for assessment.</i>	• As with any other industrial development, loading of a larger vehicle such a B-double would be managed on-site, in accordance with the operational management plan. • Swept path analysis shows that B-doubles can successfully exit the docks. • For incoming B-double vehicles, it is expected that they would be uncoupled, with the trailers manoeuvred into the bays as AVs. This is standard practice and will not impact internal traffic flow in an unacceptable manner when considered against the traffic generation.

Issues Raised by Agencies and Organisations	Proponent's Response
	It should be noted that all carparking areas and circulation roads are separated from heavy vehicle movements and will be assessed in further detail as part of future applications.
Proposed Customer Fulfilment Centre	
<i>The CFC proposes the following 5 access driveways to and from the site:</i> - Heavy vehicle entry driveway: 11.7m wide - Heavy vehicle exit driveway: 8m wide - Delivery vehicle entry driveway: 12.6m wide - Delivery vehicle exit driveway: 8m wide - Staff entry driveway: 4m wide - Staff exit driveway: 6m wide <i>The information related to the turning path analysis is not insufficient to help determine whether there is sufficient capacity at the site to accommodate the largest vehicle (26m B-Double vehicle). Turning path analysis indicating how the largest vehicle can manoeuvre into, within and out of the site shall be submitted to Council for assessment. Swept path analysis shall also demonstrate how the heavy vehicles can satisfactorily turn into and out of the loading bays.</i>	- The proposed Customer Fulfilment Centre (CFC) Facility is the subject of a separate application (SSD 10404). - The turning path analysis associated with the detailed design of the CFC Facility has been assessed as part of the separate application (SSD 10404).
<i>Clarification is required regarding the truck entry/exit driveway which is located at the western end of the Estate Road. The applicant shall indicate whether this is a combined entry/exit driveway. In addition, the proposed driveway location is directly adjacent to the driveway of the adjoining property. There will be potential conflicts between vehicles entering and exiting the two sites. The applicant shall review the location of the proposed driveway to minimise potential conflicting movements.</i>	- As outlined within the amended Traffic Assessment prepared by ASON Group and submitted at Appendix E, the driveway located at the western end of the Estate Road is to be a single exit driveway for CFC trucks only. It should be noted that the detailed locations for access points should be subject to separate, detailed SSD applications and should be considered at the appropriate stage. - However, noting the low traffic generation expected for the development within HDBP Stage 2, the concept of multiple access points is considered acceptable. Further, it is a consistent approach to that delivered on Burilda Close (HDBP Stage1).
<i>Considering the number of trucks and delivery vehicles which are expected to attend the site on a daily basis, a loading dock management plan is required. The loading dock management plan is to ensure that trucks will be accommodated within the site without impacting traffic flow into, within and out of the site. Additional measures may be required to prevent additional trucks or commercial vehicles from entering the site when all of the loading bays are occupied.</i>	- It is recommended that a Condition Consent be implemented requiring an Operational Management Plan be implemented for the individual Lots at the appropriate stage (i.e. prior to occupation). - This application relates to the Modification of the Concept Approval (SSD 7664) and is not considered the appropriate phase of the development to implement a loading dock management plan.
<i>No information is provided regarding the provision of designated loading bays for 26m B-Double vehicles to service the site. Service vehicles shall only undertake loading and unloading activities from the designated loading areas and shall not obstruct the car parking areas and traffic flow within the site. Further information shall be provided to Council for assessment.</i>	- As with any other industrial development, loading of a larger vehicle such a B-double would be managed on-site, in accordance with the operational management plan. Operational management plans will be provided as part of future applications. - Swept path analysis shows that B-doubles can successfully exit the docks. - It is expected that they would be uncoupled, with the trailers manoeuvred into the bays as AVs. This is standard practice and will not impact internal traffic flow in an unacceptable manner when considered against the traffic generation.

Issues Raised by Agencies and Organisations	Proponent's Response
	It should be noted that all carparking areas and circulation roads are separated from heavy vehicle movements.
<i>The submitted architectural plans shall show the dimensions of the proposed vehicle accesses, internal access road width, loading bays, trailer parking bays, car parking, van parking, bicycle parking, motorcycle parking, disabled spaces and ramp grades to and from various parking and loading areas of the site. This information shall be submitted to Council for assessment.</i>	- Refer to update architectural plan set for relevant dimensions. - Note that it is considered unnecessary to provide dimensions for all parking bays as part of the Modification to the Concept Approval. - All loading bays, trailer parking bays, car parking, van parking, bicycle parking, motorcycle parking and disabled spaces have been designed with regard to the Australian Standards and it is expected that this would be required as part of any Condition of Consent and would be subsequently certified by a qualified professional.
<i>A review of the site plan indicates that parking spaces are proposed in a stacked arrangement near the south-western corner of the site. According to the Fairfield City Wide DCP, Council generally does not favour the use of stacked parking within the site unless further justification is provided. In this regard, the applicant is required to submit Council further information in regard to the management of stacked parking. The applicant shall demonstrate that the provision of stacked parking arrangement will not adversely affect the safe, efficient and effective use of the site.</i>	- As detailed within the separate application for the CFC Facility (SSD 104040), the south-western corner of the Site provides for stacked parking spaces / storage for Prime Movers, Trailers and Delivery Vans for operational purposes of the Proposal and are not for cars. These spaces would be operated by staff who are skilled heavy vehicle drivers who would park the vehicles there for storage or for waiting purposes, in line with the operational management plan. - This component of works is subject to a separate application and should be dealt with at the appropriate time under SSD 10404.
Intersection of Cowpasture Road and Trivet Street (Roundabout)	
<i>Road safety audit shall be undertaken by an accredited Road Safety Auditor (a qualified person) to identify whether there are issues/risks associated with the installation of a roundabout at the intersection of Cowpasture Road and Trivet Street. A copy of the road safety audit report shall be submitted to Council for assessment.</i>	The requirement for a road safety audit is a reasonable requirement and can be appropriately addressed as a Condition of Consent.
<i>The design of the road roundabout shall comply with the Austroads Guide to Road Design Part 4B: Roundabouts. Swept path analysis shall be provided to Council to demonstrate that the design of the roundabout is adequate to accommodate the largest vehicle manoeuvring at the roundabout intersection. In this instance, the largest vehicle entering and exiting the site would be 26m B-Double vehicle.</i>	- As per the Civil Engineering Drawings and written report submitted with the Modification Application, the design of the road roundabout has been designed to comply with the <i>Austroads Guide to Road Design Part 4B: Roundabouts</i>. - Swept path analysis can be provided to Council via a Condition of Consent to demonstrate that the design of the roundabout is adequate to accommodate the largest vehicle manoeuvring at the roundabout intersection.
<i>The installation of traffic control devices such as a roundabout, signs and line markings on a public/local road requires community support and approval from the Fairfield Traffic Committee. Should the road safety audit support the installation of a roundabout, the applicant requires to obtain approval from Council's Traffic and Transport Branch. The applicant shall provide Council the consultation outcome and the proposed option for assessment.</i>	- The installation of traffic control devices will be designed and installed to comply with <i>Austroads Guide to Road Design</i>. - A road safety audit can be completed on the design prior to operation and submitted to Fairfield City Council Traffic Committee for comment prior to construction. - The design of traffic control devices can be submitted to Council's Traffic and Transport Branch for approval.
<i>The installation of a roundabout requires changes to the access arrangements to the adjacent properties which will require consent from the affected stakeholders. The</i>	Given the Concept Approval (SSD 7664) and this Modification Application have both been independently publicly notified and the Applicant has individually contacted affected stakeholders and

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<i>affected stakeholders shall be consulted regarding the proposed changes and the outcome of the consultation shall be submitted to Council for assessment.</i>	on each occasion no objections were raised in relation to the proposed access arrangements, it would be seen as an unreasonable requirement for additional consultation to be undertaken with regards to the installation of traffic control devices. - It is noted that the Applicant has individually met with each of the affected stakeholders to discuss access arrangements, specifically the land owners at: 105 Cowpasture Road. 109 Cowpasture Road 115-119 Cowpasture Road 121-123 Cowpasture Road - No objections or specific concerns were raised in consultation with these parties.
Proposed Estate Road	
<i>The construction of an Estate Road to service the development shall be referred to Council's Subdivision Branch for review and assessment. The design of the Estate Road shall comply with Council's requirements.</i>	This requirement and can be appropriately addressed as a Condition of Consent.
<i>The applicant shall submit a swept path diagram showing the largest vehicle can turn into and out of the Estate Road without being impacted by the parked vehicles on the Estate Road.</i>	- As outlined in the Transport Assessment (submitted at Appendix E), swept paths into and out of the Estate Road demonstrate that cars are to be prohibited parking on-street at the following places: - Westbound between the roundabout and the CFC's truck entry driveway. - Westbound and eastbound between the CFC van exit driveway and the halfway point between the CFC van exit driveway and the CFC van entry driveway. - The location of these parking restrictions to accommodate two-way flow of 26m B-doubles are outlined within the Transport Assessment. - The required parking restriction will be implemented following consideration by Council's Traffic and Transport Branch.
<i>As Chandos Road and Trivet Street are 5-tonne load limited streets, heavy vehicles shall be restricted from accessing these roads. Clarification is required regarding this matter.</i>	Noted. Heavy vehicles shall be restricted from accessing Chandos Road and Trivet Street.
Aboriginal Heritage	
<i>The subject sites are located within the Deerubin Aboriginal land council area and within an Aboriginal Potential Investigation Area. As part of the original approval process for SSD 7664 extensive consultation per the due diligence process was undertaken with key stakeholders identified within page 21 of the Aboriginal Cultural Heritage Assessment.</i>	- Consultation was undertaken with Indigenous stakeholders during the preparation and assessment of the EIS for the Concept Approval and Stage 1 works SSDA (SSD 7664). - The Aboriginal consultation process did not identify any specific cultural associations with the study area, but did note that it is located in close proximity to Prospect Hill and the Prospect area generally,

Issues Raised by Agencies and Organisations	Proponent's Response
<i>The letter of modification provided with SSD 7664 Mod 1 does not mention if these individuals have been appropriately consulted with per the requirements under the relevant legislation during the preparation of SSD 7664 Mod 1.</i> <i>It appears that the proposed modifications move the scope of works for the project into areas where aboriginal relics could be more likely to occur. According to the Aboriginal site prediction statement prepared for the site in 2016 by Biosis Pty Ltd (Pg. 34), it is likely that archaeological relics including, flaked stone artefact scatters, isolated artefacts, potential archaeological deposits (PADs) and scar trees may still exist on site despite the high level of site disturbance.</i> <i>This is because there appears to be stands of trees still existing on the subject site indicating that relic types as stated above may be present. The proposed modification to site access will move the proposed internal road further north to the intersection of Trivett Street which will result in the clearance of a large stand of native vegetation where relics may exist, including a scar tree.</i> <i>A portion of the existing site is identified as a potential investigation area for Aboriginal Heritage. As part of the original application, the Horsley Drive Business Park Stage 2 (SSD 7664) Aboriginal Cultural Heritage Assessment Report (10 October 2016, prepared by Biosis) outlined a series of recommendations including the following:</i> Recommendation 5: Continued consultation with the registered Aboriginal stakeholders: <i>As per the consultation requirements, it is recommended that the proponent provides a copy of this draft report to the Aboriginal stakeholders and considers all comments received. A copy of the final report should also be sent to all Aboriginal stakeholders for their records. The proponent should continue to inform these groups about the management of Aboriginal cultural heritage sites within the study area throughout the life of the project.</i> <i>Notwithstanding this recommendation, the recent submission provided in conjunction with the subject modification by Biosis dated 10 March 2020 concluded the following: there is a low potential for Aboriginal sites or areas of archaeological potential to be present within the study area. Therefore further archaeological assessment in advance of the proposed works is not recommended.</i> <i>Notwithstanding this conclusion there does not appear to be any evidence of continued consultation with the relevant groups, which was previously deemed as necessary in the report submitted with the original application. It is strongly recommended that the applicant be required to fulfil this commitment and provide evidence accordingly.</i>	which were of high cultural significance to the Aboriginal community, and that the local area was of spiritual and cultural significance (Biosis Pty Ltd 2016a, p.26). • The findings of the revised Biosis Aboriginal heritage advice did not identify any Aboriginal sites or areas of archaeological potential within the study area. • An updated extensive search of the AHIMS database was conducted on 14 January 2020 (Client service ID:476549). One new Aboriginal site, UC IA 17 (AHIMS#45-5-5047) has been registered in close proximity to the study area since the original assessment was completed in 2016. • Based on a review of the AHIMS search data, it has been determined that this site consists of an isolated artefact, with its registered co-ordinates placing it outside of the study area within the easement of the Upper Canal. Based on the results of the AHIMS search, it has been determined that there are no registered Aboriginal sites present within the study area. • As a result, the proposed modifications can be accommodated without generating impacts over and above that which was previously approved under SSD 7664 and are considered appropriate by relevant legislation. • As per the recommendations from the original ACHA, the proponent will continue to inform the Aboriginal stakeholders about the management of Aboriginal cultural heritage sites within the study area throughout the life of the project. This includes the Aboriginal heritage advice addendum letter (Appendix G) relating to Lot 17 DP13961, which was not included as a part of the original SSD application. Appendix G will be sent to the Aboriginal stakeholders who registered for the original ACHA completed by Biosis (Biosis Pty Ltd 2016a).

Issues Raised by Agencies and Organisations	Proponent's Response
Heritage recommendations	

The following recommendations are made from a heritage perspective:

- The applicant should be required to continue to consult with the Aboriginal stakeholders throughout the life of the project. This includes notifying such groups of any changes to the proposal, allowing for any feedback to be received and including this feedback in the modification application.
- In addition to the above, conditions should be applied to the consent, which ensure that any potential affected indigenous and non-indigenous heritage is protected as part of the development. See table 2 below.

Table 2 – Recommended Heritage Conditions

Heritage Conditions	
Prior to construction	1) Evidence of Ongoing Consultation The applicant is required to provide evidence of ongoing consultation with all relevant Aboriginal stakeholders including notifying such groups of the proposed modification. This evidence should echo the consultation and replies received, which was appended to the Aboriginal Cultural Heritage Assessment Report (10 October 2016, prepared by Biosis). Reason: To ensure that appropriate consultation is undertaken.
	2) Protection of Upper Canal System Prior to the commencement of construction, the applicant should prepare and propose a construction management plan, which demonstrates that the development will not result in any adverse impacts on the exiting State Heritage Item. The plan should identify but must not be limited to the following: - Transport routes prior to, during and post construction, which avoid the heritage item and any likely impact on this; - Protective measures that will ensure the item is protected at all times during construction and utilisation; - Areas identified for the storage of any building materials, machinery, spoil and utilities for tradespeople, which avoids any adverse impact on the heritage item; and - Any other

- **Condition 1** - As per the recommendations from the original ACHA, the proponent will continue to inform the Aboriginal stakeholders about the management of Aboriginal cultural heritage sites within the study area throughout the life of the project. This includes the updated advice Heritage Advice Letter (**Appendix G**) relating to Lot 17 DP13961, which was not included as a part of the original SSD application. **Appendix G** will be sent to the Aboriginal stakeholders who registered for the original ACHA completed by Biosis (Biosis Pty Ltd2016a).
- **Condition 2** - Suitable condition for addressing in design phase. The CEMP prepared by Charter Hall ensures the due protection of the State Heritage item.
- **Condition 3** – Noted. The CEMP prepared by Charter Hall incorporates an Unexpected Finds Procedure to ensure that all actual or potential heritage items uncovered during construction are protected in accordance with the NSW Heritage Act (1977).
- **Condition 4** – Noted. The CEMP prepared by Charter Hall incorporates an Unexpected Finds Procedure which work ceases in the instance where there is a suspected discovery of an 'object' in accordance with the National Parks & Wildlife Act (1974).

	Reason: To ensure that the State Heritage item is protected.
During Construction	3) Archaeology In accordance with Section 146 of the NSW Heritage Act, during the demolition, excavation or construction works; if any deposits, objects or relics are uncovered; the works are to stop immediately, and the NSW Heritage Council notified of the discovery. Depending on the nature of the discovery and advice from the NSW Heritage Council, an application for an excavation permit under Section 140 of the NSW Heritage Act may be required to be made. Reason: To be consistent with the NSW Heritage Act (1977).
	4) Indigenous Heritage In accordance with Council's Aboriginal Heritage Study, this condition is applied in addition to Condition 1 Archaeology (above) to ensure that any objects of potential indigenous significance are protected. Such objects are not specifically protected by the relics provision as outlined by the NSW Heritage Council. The National Parks & Wildlife Act (1974) provides statutory protection for all Aboriginal 'objects' (consisting of any material evidence of the Aboriginal occupation of NSW) under Section 90 of the Act, and for 'Aboriginal Places' (areas of cultural significance to the Aboriginal community) under Section 84. It is an offence to harm either an Aboriginal object or Aboriginal Place in NSW. The Act defines an Aboriginal 'object': <i>'as any deposit, object or material evidence (not being a handicraft for sale) relating to indigenous and non-European habitation of the area that comprises New South Wales, being habitation before or concurrent with the occupation of that area by persons of non-Aboriginal European extraction, and includes Aboriginal remains'.</i> Works must be stopped in the instance where there is a suspected discovery of an 'object' in accordance with the above definition and a valid and applicable Aboriginal Heritage Impact Permit be obtained under Section 90 of the NPW Act.

	Reason: To be consistent with the provisions of the National Parks & Wildlife Act (1974) and ensure the protection of all objects that are significant.	
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Issues Raised by Agencies and Organisations	Proponent's Response
Water NSW	
Bulk Earthworks – changed levels	
<i>Comment</i> <i>It is noted that along the western boundary of the site, significant cut and fill would occur adjacent to the Upper Canal corridor, and the finished development levels would be lowered to enable adequate drainage and a flat building pad. Insufficient detail is provided on retaining wall 2, including materials to be used and drainage, to give confidence that the retaining wall is adequate to retain the load.</i> <i>Requested Conditions:</i> <i>Prior to the commencement of construction on lot 1, the Applicant is to provide WaterNSW with detailed design plans for the batter and retaining wall 2, certifying the wall and batter design.</i> <i>All site preparation and construction work carried out adjacent to the Upper Canal corridor must not impact on water quality, or damage the Canal infrastructure or land. Should any damage occur as a result of the works being carried out on the subject site, it will be the responsibility of the developer to rectify that damage to the satisfaction of WaterNSW and/or compensate WaterNSW for any associated costs.</i> <i>- Effective erosion and sediment controls must be installed prior to any activity adjacent to the Upper Canal corridor to prevent sediment, dust or polluted water entering the corridor. The controls must be regularly maintained and retained until the building works have been completed and the ground surface stabilised or groundcover re-established.</i>	• This requirement can be appropriately addressed as a Condition of Consent. • It is noted that early works can commence on Lot 1 under the existing approval SS\$ 7664 however the Applicant is committed to ensuring detailed design plans for the batter and retaining wall 2 will be provided to Water NSW following the assessment of SSD 7664 MOD 1.
Vibration Impacts	
<i>Comment</i> <i>The Upper Canal is more than 130 years old, and many parts are fragile and at risk of cracking or collapse. Vibration from excavation and construction works occurring close to the Canal can increase the potential for damage to occur.</i> <i>The Construction Noise and Vibration Management Plan (SLR, January 2020) does not list the WaterNSW Upper Canal as a sensitive receiver, considering its age and proximity to the site. However, Figure 4 indicates that controls are required for vibration intensive equipment working near the Upper Canal structure.</i> <i>Requested Conditions:</i> <i>Prior to commencement the proponent is to confirm with and advise WaterNSW of the potential vibration impacts on Water NSW's Upper Canal structure.</i>	• The Noise Impact Assessment Report prepared by SLR (Appendix I) has been amended to identify the potential vibration impacts on Water NSW's Upper Canal structure. • The amended report recommends mitigation measures to minimise impacts on the Upper Canal structure. These recommendations will be implemented include: - Relocate vibration generating plant and equipment to other areas within the site in order to lower the vibration impacts. - Investigate the feasibility of rescheduling the hours of operation of major vibration generating plant and equipment. - Use lower vibration generating items of plant and equipment where possible e.g. smaller capacity vibratory rollers.

Issues Raised by Agencies and Organisations	Proponent's Response
- Vibration mitigation measures are to be implemented as per the Construction Noise and Vibration Management Plan. - The proponent is to consult with WaterNSW on the vibration monitoring mitigation measure prior to its application.	- If vibration intensive works are required within the safe working distances, vibration monitoring or attended vibration trials would be undertaken to ensure that levels remain below the cosmetic damage criterion. - The WaterNSW's requested conditions regarding vibration impacts are reasonable and relevant. Charter Hall will consult with WaterNSW on the vibration monitoring mitigation measures during the construction phase.
HeritageNSW	
<i>Comment</i> Thank you for your referral dated 1 April 2020 inviting comments from the Heritage Council of NSW on the above State Significant Development proposal for Horsley Drive Business Park within the Western Sydney Parklands. The subject site is not listed on the State Heritage Register (SHR). It is, however, located in the vicinity of SHR listed item, Upper Canal System (Pheasants Nest Weir to Prospect Reservoir) – SHR no. 1373. The modification application and relevant supporting documentation have been reviewed. The modifications relate to revisions to the approved Concept Plan (SSD 7664), which was for a range of uses such as general and light industrial, warehouse, distribution and ancillary office land uses (88,700m² total), as well as Stage 1 earthworks for subdivision (7 lots), an internal access road, demolition, bulk earthworks, infrastructure and landscaping. The modifications facilitate revised location for vehicular access, revised lot configurations, minor reductions in size and development footprint of Warehouses 3 and 4 and associated changes to finished development levels of the site. As the modifications are not major and the proposal remains substantially the same, comments provided by Heritage NSW (on behalf of the Heritage Council of NSW) on 30 January 2016 remain unchanged, and no additional comments are provided. The Department does not need to refer subsequent stages of this proposal to the Heritage Council of NSW. If you have any questions regarding the above advice, please contact Shikha Jhaldiyal, Senior Heritage Assessment Officer at Heritage NSW, on 9873 8545 or Shikha.Jhaldiyal@environment.nsw.gov.au.	No further action required.
Transport for NSW	
Thank you for your correspondence via Major Projects Planning portal (ref: PAE-2659) on 1 April 2020, requesting Transport for NSW (TfNSW) to review and comment on the subject proposal.	Noted. Addressed as part of the SSD-10404 application.

Issues Raised by Agencies and Organisations	Proponent's Response
<i>The documents exhibited in support of the proposal has been reviewed. It is noted that the proposal serves largely the purpose of making modifications to the approved development to support the southern portion of the site, which is another proposal (SSD 10404) under assessment concurrently. TfNSW had provided its submission (SYD19/01554/02) to SSD 10404 on 9 April 2020.</i> <i>Comments provided under SSD 10404 are relevant for consideration for the subject proposal. In particular, the comments regarding the proposed works at the intersection of Cowpasture Road and Trivett Street, Wetherill Park. As this location is under the care and control of Council, any proposed works will need to be undertaken in accordance with Council's requirements.</i> <i>Thank you again for the opportunity of providing advice for the above development application. If you require any further information, please don't hesitate to contact Billy Yung, Senior Transport Planner, via email at billy.yung@transport.nsw.gov.au. I hope this has been of assistance.</i>	
Environment and Science	
<i>Thank you for your email received on 9 April 2020, requesting input from Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment (DPIE) on the State Significant Development Horsley Drive Business Park Stage 2 Modification 1.</i> <i>EES has read the supporting documentation and notes that there is an inconsistency between the information in the modification application and the Biodiversity Development Assessment Report (BDAR). Section 6.7 of the modification application states that, as outlined in the BDAR (App F), the proposal will now require 36 ecosystem credits not 39.</i> <i>However, the BDAR, prepared by Eco logical dated 7 April 2020, states that 39 credits were required for SSD 7664, and given the modification will impact an additional 0.015 ha of PCT 835, one additional credit is required (see Table 25 and App C). EES requests clarification on this matter.</i> <i>Should you have any queries regarding this matter, please contact Bronwyn Smith, Senior Conservation Planning Officer on 9873 8604 or bronwyn.smith@environment.nsw.gov.au.</i>	• Section 6.7 of the Modification Application erroneously states that 36 credits are required as a result of the development. SSDA 7664 was already approved with an impact to 1.09 hectares of native vegetation, and the FBA assessment identified a requirement to retire 39 BioBanking ecosystem credits (30 for 0.76 ha PCT 850 and 9 for 0.33 ha of PCT 835). These BBAM credits are currently being purchased and retired. • The subject site for the current BDAR covers an additional area of 2.92 ha outside the previously approved SSD 7764 land, with the clearing of 0.015 ha of PCT 835 requiring one (1) BAM ecosystem credit. • Please refer to the Biodiversity Assessment Report Addendum Letter provided at Appendix B.
Endeavour Energy	
<i>Endeavour Energy has noted the Section 4.55(2) Modification Application that 'The southern portion of the site is bound by an Endeavour Energy electricity easement containing overhead power lines, although this is not within the site boundary'.</i>	• A submission for power will be made to Endeavor Energy prior to commencement or during construction phases addressing the matters raised below in relation to Network Capacity/Connection, Flooding and Drainage and Bushfire.

Issues Raised by Agencies and Organisations	Proponent's Response
<i>Subject to the foregoing and the following additional recommendations and comments Endeavour Energy has no objection to the Development Application.</i> Network Capacity / Connection <i>Endeavour Energy has noted the following in the Civil Engineering Report Modification to SSD 7664 (MOD1) (Rev C 19 Mar. 2020) addressing the suitability of the site for the development in regard to whether electricity services are available and adequate for the development.</i> 3.3 Power Endeavour Energy is the servicing authority for energy adjacent to the site. Existing in-ground supply are located in Cowpasture Road and Victoria Street past the subject site frontage. An enquiry to the service provider will be necessary to confirm the ability of these cables to service the site. Endeavour Energy will require the engagement of a Level 3 Service Provider to further assess the capacity of the existing system and the requirements for the infrastructure to service the proposed development. Notwithstanding the further investigations and applications required with Endeavour Energy, it is considered that power supply will be able to be provided to the development site from existing power infrastructure. <i>Endeavour Energy's Network Connections Branch are responsible for managing the conditions of supply with the proponent and their Accredited Service Provider (ASP). Further advice can be obtained from Endeavour Energy's Network Connections Branch (via Head Office enquiries on telephone: 133 718 or (02) 9853 6666 from 9am - 4:30pm.</i> Flooding and Drainage <i>Endeavour Energy has noted in the Civil Engineering Report Modification to SSD 7664 (MOD1) that 'The estate is located within Fairfield City Council and has been identified in their Wetherill Park Overland Flood Study 2013, as being affected by overland flow'.</i> <i>The electricity network required to service an area / development must be fit for purpose and meet the technical specifications, design, construction and commissioning standards based on Endeavour Energy's risk assessment associated with the implementation and use of the network connection / infrastructure for a flood prone site. Risk control has focused typically on avoiding the threat, but where this is not possible, reducing the negative effect or probability of flood damage to assets by implementing good design and maintenance practices.</i> <i>Distribution substations should not be subject to flood inundation or stormwater runoff i.e. the pad mount substation cubicles are weatherproof not flood proof and</i>	

Issues Raised by Agencies and Organisations	Proponent's Response
<i>the cable pits whilst designed to be self-draining should not be subject to excessive ingress of water. Section 7 'Substation and switching stations' of Endeavour Energy's Mains Construction Instruction MCI 0006 'Underground distribution construction standards manual' provides the following details of the requirements for flooding and drainage in new pad mount substation locations.</i> <i>7.1.6 Flooding and drainage</i> Substations are to be located such that the risk of flooding or stormwater damage is minimal. As a minimum the level at the top of the transformer footing, HV and LV switchgear, shall not be lower than the 1:100 year flood level. All drains within the substation site area or in the vicinity shall be properly maintained to avoid the possibility of water damage to Endeavour Energy's equipment. In areas where, as determined by the Network Substation Manager, there is a high water table or a heightened risk of flooding, indoor substations will not be permitted. All materials used in the construction below the substation (ground level) shall be capable of withstanding prolonged immersion in water without swelling or deterioration. Bushfire <i>Endeavour Energy has noted that a bushfire assessment has been undertaken of the proposed Horsley Drive Business Park Stage 2.</i> <i>Although industrial uses are not covered by Chapters 5 to 7 of NSW Rural Fire Service 'Planning for Bush Fire Protection 2019' (PBP), the aim and objectives of PBP still need to be considered and a suitable package of bush fire protection measures should be proposed commensurate with the assessed level of risk to the development. PBP provides the following advice regarding electricity services:</i>	

Issues Raised by Agencies and Organisations**Proponent's Response****5.3.3 Services – Water, electricity and gas**

Intent of measures: to provide adequate services of water for the protection of buildings during and after the passage of bush fire, and to locate gas and electricity so as not to contribute to the risk of fire to a building.

Table 5.3c

Performance criteria and acceptable solutions for water, electricity and gas services for residential and rural residential subdivisions.

PERFORMANCE CRITERIA		ACCEPTABLE SOLUTIONS	
The intent may be achieved where:			
ELECTRICITY SERVICES	➤ location of electricity services limits the possibility of ignition of surrounding bush land or the fabric of buildings.	➤ where practicable, electrical transmission lines are underground;	
		➤ where overhead, electrical transmission lines are proposed as follows:	
		➤ lines are installed with short pole spacing of 30m, unless crossing gullies, gorges or riparian areas; and	
		➤ no part of a tree is closer to a power line than the distance set out in ISSC3 <i>Guideline for Managing Vegetation Near Power Lines</i> .	

The following is an extract of Endeavour Energy's Company Policy 9.1.1 Bushfire Risk Management:

9.1.1 BUSHFIRE RISK MANAGEMENT**1.0 POLICY STATEMENT**

The company is committed to the application of prudent asset management strategies to reduce the risk of bushfires caused by network assets and aerial consumer mains to as low as reasonable practicable (ALARP) level. The company is also committed to mitigating, the associated risk to network assets and customer supply reliability during times of bushfire whilst achieving practical safety, reliability, quality of supply, efficient investment and environmental outcomes. The company is committed to compliance with relevant acts, regulations and codes.

Accordingly the electricity network required to service the proposed development must be fit for purpose and meet the technical specifications, design, construction and commissioning standards based on Endeavour Energy's risk assessment associated with the implementation and use of the network connection / infrastructure for a bushfire prone site. In assessing bushfire risk, Endeavour Energy has traditionally focused on the likelihood of its network starting a bushfire, which is a function of the condition of the network. Risk control has focused on reducing the likelihood of fire ignition by implementing good design and maintenance practices. However the potential impact of a bushfire on its electricity infrastructure and the safety risks associated with the loss of electricity supply are also considered.