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25 February 2022

Mr Chris Ritchie
Director, Industry Assessments
NSW Department of Planning & Environment
Locked Bag 5022
Parramatta NSW 2124

CC: Rebecka Groth

Dear Chris,

RESPONSE TO SUBMISSIONS: SSD-21190804 - JALCO MANUFACTURING FACILITY

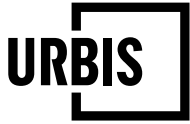
This letter is written in response to correspondence received from the NSW Department of Planning and Environment (**DPE**) between December 2021 and January 2022, including submissions made in respect to public exhibition of the proposed Jalco Manufacturing Facility State Significant Development Application (**SSDA**), identified as SSD-21190804.

During the exhibition period the application received seven submissions all from government agencies who requested further information be provided regarding the application. No submissions were received from members of the public.

This letter and subsequent response table has been prepared to address the matters raised by the relevant government agencies, to ensure the DPE are able to make an informed assessment of SSD-21190804.

This letter is accompanied by the following documentation, which comprehensively addresses the issues raised by the DPE and other government agencies:

- **Appendix A:** Dangerous Goods Storage Process Map – Jalco Group, 09 February 2022
- **Appendix B:** Warehouse 1, Lot 201 ESR Horsley Logistics Park – Request for Additional Information - Transport Statement – Ason Group, 15 February 2022
- **Appendix C:** Liquid Process Flow Diagram – Jalco Group, 04 February 2022
- **Appendix D:** Hydraulic Services Site Plan – HLC Architects, 28 October 2021
- **Appendix E:** Revised Air Quality Impact Assessment – SLR, 22 February 2022
- **Appendix F:** Stormwater Management Plan – Constin Roe Consulting, 28 May 2021
- **Appendix G:** ESR Horsley Logistics Park – Lot 201 Civil Works Package, Detailed Design – Costin Roe Consulting, 13 October 2021
- **Appendix H:** State Environmental Planning Policy (Western Sydney Aerotropolis) 2020 Compliance Table – Urbis Pty Ltd, February 2022



- **Appendix I:** Horsley Logistics Park - Jalco SSDA Response to EPA Request for Additional Information – SLR, 24 February 2022
- **Appendix J:** Dissolved Air Flotation Process Flow Diagram – Integra, 24 January 2022
- **Appendix K:** Dissolved Air Flotation Plant Function Description & Jalco Horsley Park – Integra, 22 December 2021

The accompanying documentation addresses each of the issues raised by Council, as summarised in Table 1 (overleaf).

We trust the information submitted with this response letter will adequately address the outstanding matters as raised by the DPE and other government agencies following the exhibition period of SSD-21190804.

Should you require any additional information regarding the matter please do not hesitate to reach myself at the undersigned, or John Booth on (02) 8233 7690.

Kind regards,

A handwritten signature in black ink, appearing to read "JParker", written in a cursive style.

Jacqueline Parker
Director
+61 2 8233 9969
jparker@urbis.com.au

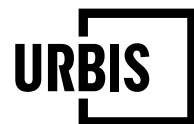
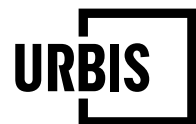
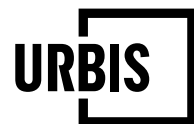


Table 1 Response to Submissions

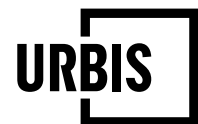
Matter for Consideration	Response
Department of Planning & Environment – Industry Assessments	
<u>General</u>	
The EIS states that the Applicant seeks approval for the production of 4000 tonnes per year of chemical products. The EIS also suggests the development would require a licence from the EPA (exceeding 5,000 tonnes per year) given the proposal would produce 180,000,000 litres of soap and detergent products per year. This amount would equate to around 181,976 tonnes of liquid soap (depending on the exact weight of product). - Respond to this contradiction and provide a clear indication of the exact amount in tonnes proposed to be produced per year. - It is noted that some of the technical studies have been prepared based on a maximum throughput or production capacity of 4000 tonnes per year. Should an increase quantity be proposed, these studies would need to be updated.	The maximum production capacity at the proposed Jalco facility includes the following: 4,000 tonnes per week; 45 weeks a year in operation. The remaining weeks are allocated to plant maintenance and shutdowns; and 180,000,000 litres per year. There are three phases identified with the onboarding of this facility. The forecasted production per week is as follows: - Phase 1: 2,000 tonnes per week - Phase 2: 3,000 tonnes per week - Phase 3: 4,000 tonnes per week



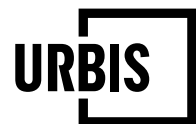
Matter for Consideration	Response
	The rollout of phases will be done progressively through the life of the development. Current indicative timeframes are the following: ▪ Phase 1: Completion September 2022 ▪ Phase 2: Completion 2025 ▪ Phase 3: Completion 2028 Technical studies for this SSDA have assessed against the ultimate production volume intended for this site.
Provide details of how the liquid truck filling station will operate. ▪ Also provide an indication of the height of the conveyors and given their location at the frontage of the lot, assess any potential visual impacts caused by the structures.	Trucks containing bulk liquid raw materials will be parked next to the respective liquid filling station. A flexible hose is connected to the pump and the raw materials are pumped to a bulk storage tank within the building. The transfer pipeline from the pump to the bulk storage tank will be underground and underneath the hardstand. The pumps would be the only equipment above ground associated with the liquid filling station. The maximum height would be between 750mm to 1000mm. Given the location of the pumps behind the car park, they would not be visible from the street. Therefore, the visual impacts associated with the liquid filling station are considered minimal environmental impact.



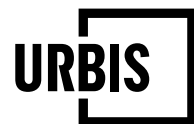
Matter for Consideration	Response
Justify the external loading and unloading of DG's given the availability of several loading bays for internal loading and unloading.	Dangerous goods are proposed to be delivered in Intermediate Bulk Containers (IBC) and drums to external sheds. In addition, the dangerous goods required to be delivered via tanker trunks will be hooked into the liquid filling station and transferred to the internal drums. Refer to Dangerous Movement diagram at Appendix A of this letter. All roller shutter doors along the warehouse face are required to be used for product and bottle storage delivery. To minimise disruption on the production line, the dangerous goods are located to minimise disruption and enable ease of access when the material is required. Once the delivery of the dangerous goods occurs, the material will be transferred from the storage shed to production via forklift.
Provide more details on the Applicant's Smithfield operations which has been used as a reference facility in the EIS, including: ▪ Amount of liquid soap and detergents produced per year, noting the EIS suggests the total throughput of the Smithfield site including liquid and solid soap is around 4000 tonnes per year. ▪ Maximum production amounts per day in tonnes. ▪ Number of employees.	The current Smithfield operations entail the following: ▪ Average 220T/day and peak operation 264T/day. ▪ Annual volume is 66,000T/year (assuming 6 working days/week and 50 weeks/yr) In comparison, the throughput rate at Horsley Park for Phase 1 is assumed to be 285T/day or 2,000T/week (assuming a 7 working day



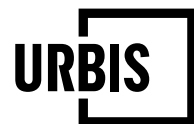
Matter for Consideration	Response
▪ Additional background information on Jalco including types of products produced and application, main customers and locations of primary on-sellers of the product. ▪ A breakdown of vehicle movements including heavy vehicles.	operation). The Phase 1 annual volume will be 100,000T/year (assuming 50 weeks/year). The subsequent phases are as follows: ▪ Phase 2: 430T/day or 3,000T/week ▪ Phase 3: 570T/day or 4,000T/week The number of employees at the Smithfield operation is 114 employees. Jalco manufactures a range of household care products including: ▪ Laundry detergent (liquid) ▪ Pre-wash soakers and boosters ▪ Bleach ▪ Window cleaner ▪ Floor cleaners ▪ Multi-purpose cleaners ▪ Toilet cleaners ▪ Dishwashing liquid



Matter for Consideration	Response
	These products are distributed to supermarkets and retailers across Australia. A breakdown of heavy vehicle movements is provided in Ason's Response to Submissions provided at Appendix B .
The Process Flow Diagram at Appendix S contradicts the information in the EIS relating to production capacity and employee numbers	The process flow diagram has been updated to reflect the production capacity and employment numbers for Jalco's site at Horsley Logistics Park and is now considered consistent with the information provided within the EIS. Refer to Appendix C .
The EIS suggests the site would have 60 staff and have a production rate of 4000 tonnes per year. Please clarify this contradiction.	The staffing reduction is realised through automation and machinery, where possible and viable. The staff breakdown per each phase is as follows: ▪ Phase 1: 60 Staff; ▪ Phase 2: 87 Staff; and ▪ Phase 3: 114 Staff.
<u>Traffic</u>	
The Transport Assessment suggests the swept paths and manoeuvring of vehicles on site has been approved as part of MOD 1 of SSD 10436. However, MOD 1 did not propose the unloading of DG's externally via forklift.	Dangerous goods are proposed to be unloaded via the liquid filling stations or rolling shutter doors at the bottle storage location. From there, the dangerous goods will be piped or removed via forklift. The loading and unloading does not change the swept path movements across the



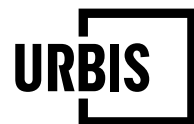
Matter for Consideration	Response
Provide the location of the DG loading and unloading area in consideration of the swept path requirements of other trucks including those parked at the liquid filling station and trucks in the loading docks.	site. The approved swept paths approved under Mod 1 of vehicles using the site will not conflict with the DG's storage area. Refer to Dangerous Goods diagram at Appendix A.
The Transport Assessment suggests that operational traffic data was provided to the author of the assessment by ESR based on the Smithfield operations. How were these traffic counts taken? Are the Smithfield operations precisely representative of the proposal to assume the vehicle movements would be the same? Are the traffic numbers based on the Smithfield site operating at full capacity to the same level of throughput and output as the proposal? Are all the vehicle numbers from liquid soap manufacturing?	This statement is correct. The operational data was provided by ESR (and based off the Smithfield operations). The data provided is relevant to the proposal in its raw form, and as such has not been extrapolated to inform the production capacity and therefore traffic generation of the wider HLP. Surveys completed as part of this Response to Submissions confirm the traffic data adopted for the Traffic Assessment. Refer to Ason's Response to Submissions at Appendix B for further information.
Provide a breakdown of the types and quantities of trucks that deliver materials, chemicals and dangerous goods to the site. How often is the liquid filling station utilised to necessitate three filling points? How long does it take to pump out the liquids in the tanker?	One truck to each liquid filling station (3) per day. Each truck will take 45min - 1hr to unload dangerous goods via liquid pumping station. The remaining dangerous goods will be unloaded via the roller shutter doors. The coordination of these materials will be managed by a Loading Dock Management plan which will inform truck movements associated with end product collection and bottle deliveries.
<u>Air Quality</u>	



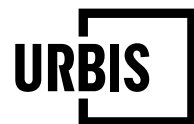
Matter for Consideration	Response
The AQIA was based on a production capacity of 4000 tonnes per year and a total of 30 heavy vehicle movements per day. This contradicts the Traffic Assessment and the EIS. Please clarify and have the AQIA updated if required.	The project is proposed to operate on a 24/7 basis with a proposed maximum annual average product throughput of 208,100 tonnes per annum (tpa), this includes 57 heavy vehicle movements and 317 light vehicle movements in three shifts over the 24/7 period. Section 2.2 of the AQIA has been updated to reflect this. The revised AQIA is attached as Appendix E.
The EIS states that the odour emission monitoring of the Smithfield site was utilised to create the model in the AQIA as it has a comparable production capacity of 4000 tonnes per year. Should the Applicant be seeking a throughput in excess of 4000 tonnes per year, the AQIA must be updated to assess the resultant impacts of the increased throughput.	Section 5.1 of the AQIA has been updated to assess the resultant impact of the increased throughput. This includes the emission estimation methodology and relevant measured and estimated odour emission parameters within Table 5. The revised AQIA is attached as Appendix E.
<u>Noise</u>	
As noted above, the maximum production capacity of the facility is unclear in the EIS. It appears the technical studies have been based on a production capacity of 4000 tonnes per year. In the Noise Impact Assessment (NIA) for SSD-10436 for ESR Logistics Park heavy vehicle movements were restricted on Lot 201 to 10 two-way movements over a 15-minute period to ensure cumulative operations of all tenancies met the noise limits. The NIA submitted with the EIS for this SSD has utilised the operational truck movements from the Smithfield site (see above requesting additional information on how these numbers were calculated) and suggested a	In SSD-10436, truck movements were restricted for Lot 202 during night time to mitigate against any negative externalities associated with noise. This SSDA did not restrict vehicle movements inbound or outbound during any period of the 24/7 operations at Lot 201. The acoustic modelling for both SSD 10436 and this SSDA did not identify any significant mitigation measures, such as restriction of vehicle during certain operation periods. Therefore, it is considered the acoustic report

Matter for Consideration	Response
maximum of seven trucks would be expected in a 15 minute period during the night. Should the operating capacity be increased to produce in excess of the existing Smithfield facility, updates to the NIA would be required.	for this development application is consistent and builds off the reporting for SSD-10436.
<u>Water</u>	
Provide a detailed description and specifications for the wastewater treatment plant (WTP) including maximum daily and weekly wastewater flow rates and a justification that the system can cater for these flows. - Provide a site-specific contaminated water retention plan or similar to justify the sizing and type of the proposed WTP, conveyance systems and bunding – including a water balance. - Provide a quantification of contaminated water in the case of a fire and how the proposed building, bunding and internal and external water conveyance systems can cater for the expected volumes. - A flow diagram of the wastewater treatment train including yearly quantities of wastewater should be provided. - Provide contingency measures should the WTP be out of commission.	In this Response to Submissions, Jalco has provided a process flow report and diagram demonstrating how the waste water treatment plant will operate. The detailed design of this system will occur post consent (refer to Appendix C). As part of the WTP design and commissioning, Jalco will require an approval from Sydney Water which will address the details requested. Record of consultation with and approval from Sydney Water can form part of a Condition of Consent. In relation to the fire suppression system, the following water discharge is as follows: - Warehouse ESFR Roof Level: 7330l/m x 60 minutes = 439,800L - Warehouse Awnings - 1080l/m x 60 minutes = 65,800L - Warehouse Offices - 67l/m x 6 sprinklers (402l x 60 minutes) = 24,120L - Hydraulic/ Fire Hydrants - 3lps x 3600 x 4 = 432,000L

Matter for Consideration	Response
	Further details of contingency measures will be outlined in the Sydney Water approval associated with the wastewater treatment plant. This information can be provided as a Condition of Consent.
DG's will be unloaded externally via forklifts. The EIS suggests that: "No further changes are proposed to the approved building or stormwater management works than those previously approved." Based on a review of the Contaminated Water Retention Plan for the Smithfield site at Appendix P of the EIS, this would not be the case as water from any areas which store or unload DG's would need to be directed to the WTP. SSD 10436 required a Stormwater Management Plan to be prepared prior to the construction of the warehouse. The Civil Plans for MOD 1 detail that all external stormwater captured on the roof and hardstand areas, including the external areas to be used for the unloading of DG's, would be directed to an underground OSD tank prior to discharge to the street. Provide details of how the approved stormwater management system on site would need to be augmented or re-designed to facilitate the development and the conveyance of contaminated or potentially contaminated water to the WTP. ▪ Provide Civil Plans similar to those submitted with MOD 1 of the amended stormwater system. ▪ Provide a justification for the type of storm event the system would be designed to?	A Stormwater Management Plan for SSD-10436 has been prepared and is attached at Appendix F. In addition, this plan is supported by Civil Plans attached at Appendix G. The Stormwater Management Plan demonstrates the existing stormwater management within the site has been designed to cater for the 100-year storm event. The site area and ratio of pervious to impervious surfaces has not changed from Mod 1 of SSD-10436. Therefore, the stormwater design on site is sufficient to cater to Jalco's operations. The waste water treatment plant is a separate issue to stormwater. It will manage waste water generated from within the site. This will be addressed with Sydney Water, when Jalco applies for an Environmental Protection Licence post approval and prior to OC.

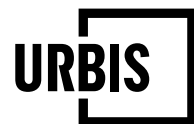


Matter for Consideration	Response
Department of Planning & Environment – Hazard & Risks	
The PHA and DG report demonstrated that the SSD can be designed to comply with the risk criteria through implementing the relevant Australian Standards. However, some design aspects could change after consulting with Fire and Rescue NSW on specific fire safety designs. We recommend a post-approval Final Hazard Analysis to confirm that the final design can remain compliant with the relevant Australian Standards.	Noted. It is recommended that a Final Hazard Analysis is able to be complete as a condition of consent.
It is considered that the PHA has been prepared in accordance with the Department's <i>Hazardous Industry Planning Advisory Paper No. 6 'Hazard Analysis'</i> , demonstrating that the SSD would be able to comply with the Departments' Hazardous Industry Planning Advisory Paper No. 5 'Risk Criteria for Land Use Safety Planning'.	Noted.
<u>Limit of Consent</u>	
The storage of DG and combustible liquids within the development must not exceed Table 3-1 of the Preliminary Hazard Analysis dated 23 September 2021.	Noted. Jalco consider this to be a suitable condition of consent.
The Applicant must store and handle all chemicals, fuels and oils in accordance with: a. the requirements of all relevant Australian Standards; and	Noted. Jalco consider this to be a suitable condition of consent.

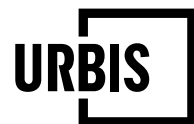


Matter for Consideration	Response
b. the NSW EPA's Storing and Handling of Liquids: Environmental Protection - Participants Handbook if chemicals are liquid. In the event of an inconsistency between the requirements in a. and b., the most stringent requirement shall prevail to the extent of inconsistency.	
<u>Hazards & Risk</u>	
The Applicant must prepare the studies set out under subsections (a) and (b) (the preconstruction studies). Construction, other than of preliminary works that are outside the scope of the hazard studies, must not commence until study recommendations have been considered and, where appropriate, acted upon. The Applicant must submit the studies to the Planning Secretary no later than one month prior to the commencement of construction of the development (other than preliminary works), or within such further period as the Planning Secretary may agree. Fire Safety study – this study must cover the relevant aspects of the Department's Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study' and the New South Wales Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems. The must be prepared in consultation with Fire and Rescue NSW, taking into consideration the Fire Safety Strategy dated 30 August 2021.	Noted. Jalco consider this to be a suitable condition of consent.

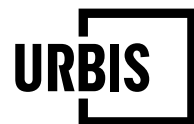
Matter for Consideration	Response
- Final Hazard Analysis of the development, consistent with the Department's Hazardous Industry Planning Advisory Paper No. 6, 'Hazard Analysis'. Prior to commissioning, the Applicant must develop and implement the plans and systems set in (a) and (b). The Applicant must submit to the Planning Secretary documentation describing the plans and systems no later than two months prior to the commencement of commissioning of the proposed development, or within such further period as the Planning Secretary may agree. - Emergency Plan – A comprehensive Emergency Plan and detailed emergency procedures for the development. The Emergency Plan must include consideration of the safety of all people outside of the development who may be at risk from the development. The plan must be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning'. - Safety Management Plan – A document setting out a comprehensive Safety Management System, covering all on-site operations and associated transport activities involving hazardous materials. The document must clearly specify all safety related procedures, responsibilities and policies along with details of mechanisms for ensuring adherence to the procedures. Records must be kept on-site and must be available for inspection by the Planning Secretary upon request. The Safety Management System must be developed in accordance with	Noted. Jalco consider this to be a suitable condition of consent.



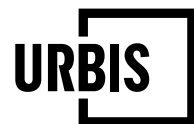
Matter for Consideration	Response
the Department's Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management'.	
Hazard Audit Twelve months after the commencement of operations of the development and every five years thereafter, the Applicant must carry out a comprehensive Hazard Audit of the development and within one month of each audit submit a report to the satisfaction of the Planning Secretary. The audits must be carried out at the Applicant's expense by a qualified person or team, independent of the development and approved by the Planning Secretary prior to commencement of the audit. Hazard Audits must be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, 'Hazard Audit'. The audit must include a review of the site Safety Management System and a review of all entries made in the incident register since the previous audit. The audit report must be accompanied by a program for the implementation of all recommendations made in the audit report. If the Applicant intends to defer the implementation of a recommendation, reasons must be documented.	Noted. Jalco consider this to be a suitable condition of consent.
Further Requirements The Applicant must comply with all reasonable requirements of the Planning Secretary in respect of the implementation of any measures arising from the reports	Noted.



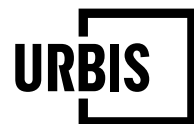
Matter for Consideration	Response
submitted in respect of conditions 3 to 5, within such time as the Planning Secretary may agree.	
Endeavour Energy	
Endeavour Energy has no objection to the development Application.	Noted.
Endeavour Energy is urging applicants/ customers to engage with an Electrical Consultant prior to finalising plans in order to assess and incorporate any required electricity infrastructure. In doing so, the consideration can also be given to its impact on the other aspects of the proposed development. This can assist in avoiding the making of amendments to the plan or possibly the need to later seek modification of an approved development application.	An application was submitted to Endeavour Energy and connection design prepared and constructed as per Endeavour Energy requirements, which in turn, provided an adequate connection point to Lot 201. The associated Endeavour Energy project numbers for this connection are UIL5973 and UIL6193.
It is unclear how the other reports provided within the EIS have taken into consideration the electricity infrastructure required to be facilitate the proposed development.	The fit out and electricity requirements of Jalco's proposed operation have been captured in all applications to Endeavour Energy. Adequate power supply is available, and this has been confirmed via the relevant applications to Endeavour Energy.
The applicant will need to complete the connection of load process for the provision of electricity supply to the proposed development.	This has been completed. Endeavour Energy are in the process of issuing a Letter of Acceptance for the project and a Permission to Connect Letter.
Western Sydney Airport	



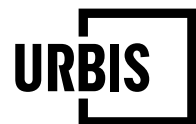
Matter for Consideration	Response
The provisions of the State Environmental Planning Policy (Western Sydney Aerotropolis) 2020 (Aerotropolis SEPP) apply to the site. The EIS does not assess the Aerotropolis SEPP or the EIE exhibited in October 2021 as relevant considerations in the legislative assessment. Part 3 of the Aerotropolis SEPP applies to the site, and therefore needs to be addressed as part of this assessment.	An assessment of the Aerotropolis SEPP has been prepared at Appendix H of this RTS response letter.
Section 6.1.6. of the EIS identifies a range of potential emissions from the proposed development. WSA requires further information on the nature of these emissions, including whether the emissions are vertical in nature, the height of ventilation equipment and what the metres per second velocity of such emissions would be. This information is required to assess if there is any potential impact to the protected airspace of Western Sydney International (Nancy-Bird Walton) Airport. <i>The Airports (Protection of Airspace) Regulations 1996 and National Airports Safeguarding Framework Guideline F: Managing the Risk of Intrusions into the Protected Airspace of Airports provide further details in relation to plume rise and protected airspace.</i>	Please refer to Section 5.2 and Table 6 of the amended AQIA attached to this letter as Appendix E.
The development to be conditioned to ensure that any intrusion into prescribed airspace obtain the required approvals under the <i>Airports (Protection of Airspace) Regulation 1996</i>.	Noted.



Matter for Consideration	Response
The Waste Management Plan identifies the storage of putrescible waste. As the proposal is within the 8-13km buffer, storage of waste is to be enclosed/ lockable to mitigate wildlife attraction.	Noted.
Any future development consent should condition that the relevant components of any future development comply with <i>Australian Standard 2021:2015 Aircraft noise intrusion - building siting and construction</i> including in relation to the identified indoor design sound levels identified at Table 3.3.	Noted.
Comments do not incorporate those from Bankstown Airport, and comments from this organisation is to be sought separately.	Noted.
Environmental Protection Authority	
The EPA has reviewed the EIS and Operational Noise Impact Assessment. The EPA's review of the NIA has identified the need for more information to amend or clarify aspects of this report. The key matters within this report that should be addressed include: - Ensuring assessment locations meet the requirements of the Noise Policy for Industry - Providing a readable and informative site layout figures	SLR have provided a specific response to the matters as raised by the EPA in relation to the ONIA. A response to the six comments is provided within <i>Horsley Logistics Park - Jalco SSDA Response to EPA Request for Additional Information</i> and is attached as Appendix I .



Matter for Consideration	Response
▪ Providing transparent information about the inputs, assumptions and methods used to calculate noise levels ▪ Clarification and consideration of the scrubber systems and exhausts ▪ Including an assessment of annoying characteristics to meet the NPfl requirements. ▪ Clarifying the location of mitigation measures. Further details are provided in Attachment A Comments on Operational Noise Impact Assessment.	
The EPA has reviewed the EIS and Air Quality Impact Assessment. The EPA's review of the Air Quality Impact Assessment has identified a number of issues that will need to be addressed including: ▪ Further information regarding the proposed air quality controls including the wet scrubber, wastewater treatment plant, and negative pressure. ▪ Consideration of the worst-case emission scenario ▪ Analysis of the building's wake effects and impact on dispersion ▪ Stake design to include possibility for emissions testing	The following section of the AQIA attached as Appendix E have been updated to consider the relevant points: ▪ Equipment design considerations – Section 9 ▪ Worse case modelling scenario – Section 6.3 ▪ Building wake effects – Section 6.2 ▪ Odour control options for WWTP – Section 9 ▪ Consideration of, and additional mitigation measures – Section 9



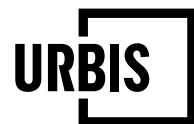
Matter for Consideration	Response
Further consideration of mitigation measures Further details are provided in Attachment B Comments on Air Quality Impact Assessment	
The EPA has reviewed the EIS and notes that wastewater will be processed through the onsite Wastewater Treatment Plant before discharge to the sewer system via a Trade Waste Agreement. The EPA would like to remind Jalco that the facility should be designed so that any contaminants are contained by bunding. Storage of Dangerous Goods are to meet relevant Australian standards and recommendations made within the EIS's supporting DG report. The EPA will be putting the following conditions on the licence to ensure this happens: - Except as may be expressly provided in any other condition of this licence, the licensee must comply with Section 120 of the Protection of the Environment Operations Act 1997 - The licensee must store all chemicals, fuels and oils used on site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards.	Noted. Jalco consider this to be a suitable condition of consent.

Matter for Consideration	Response
The EPA requests that Jalco clarify the predicted chemical liquid production outputs stated within the EIS, as per the following: ▪ Section 3.2.4 of the EIS states 4000T of chemical liquid will be produced, however it is not clear at what rate this produced e.g. per week, per month, etc. ▪ Section 4.1 of the EIS states 180,000,000 litres of soap and detergent products to be produced per year. ▪ Is this expected to be the production output within the first year of operation or is a gradual increased output expected? ▪ Do the production output values within Section 3.2.4 with the expected output of 180,000,000 litres per year stated within Section 4.1?	Please see above response to DPE – Industry Assessments section.
Transport for NSW	
TfNSW has reviewed the submitted documents and raises no objections.	Noted.
A construction traffic and pedestrian management plan must be prepared prior to the issue of the construction certificate with details of predicted construction traffic movements, routes, and access arrangements, and outline how construction traffic impacts on existing traffic, pedestrian and cycle networks would be appropriately mitigated and managed.	Noted. This can be required as a 'Prior to Construction Certificate' condition.

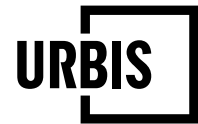
Matter for Consideration	Response
The proposed access and manoeuvring arrangements must be in accordance with the following requirements: ▪ The swept path of the longest vehicle (including garbage trucks, building maintenance vehicles and removalists) entering and exiting the subject site, as well as manoeuvrability through the site, shall be in accordance with AUSTROADS. In this regard, a plan shall be submitted to Council for approval, which shows that the proposed development complies with this requirement. ▪ The layout of the proposed car parking areas associated with the subject development (including driveways, grades, turn paths, sight distance) should be in accordance with AS 2890.1-2004, AS2890.6-2009, and AS2890.2-2018 for heavy vehicle usage. Parking restrictions may be required to maintain the required sight distances at the driveway. ▪ All vehicles are to enter and leave the site in a forward direction ▪ All vehicles are to be wholly contained on site before being required to stop. ▪ The proposed development will generate additional pedestrian movements in the area. Pedestrian safety is to be considered in the vicinity.	Jalco's operations are consistent with the requirements. Further confirmation of compliance can be detailed in the OTMP as part of Conditions of Consent.
An Operational Traffic Management Plan is required to be prepared prior to occupancy.	Noted. To form an Occupational Certificate requirement as part of the Condition of Consent.

Matter for Consideration	Response
A Green Travel Plan is required to be prepared prior to occupancy.	Noted. To form an Occupational Certificate requirement as part of the Condition of Consent.
Fairfield City Council	
The following additional information needs to be submitted for consideration: - Knowing that the proposal seeks to produce 180,000,000 litres of soap and detergent products per year, the consultant is required to elaborate and provide further justification as to why the volatile organic compound (VOC) as an air pollutant has not considered further in the assessment, considering the volume of chemicals sorted and products manufactured on site. - The consultant stated in Section 2.3.2.1 "It is noted that handling of chemicals will be conducted under a Fume Hood and all extracted air will be treated before being released to the atmosphere. Given above, the Project is unlikely to cause any significant release of VOCs that may elevate the existing VOCs level in the surrounding area." No information has been provided on the type of air and odour pollution treatment/control equipment to be used/installed at the proposed site and whether this has capacity to deal with the volumes generated. - The consultant shall discuss and provide details on all types of air and odour pollution treatment/ control equipment to be installed at the site and shall demonstrate how effective the air and odour pollution treatment/ control	The following section of the AQIA attached as Appendix E have been updated to consider the relevant points: - VOCs and odours from manufacturing and storage of raw-material/finished products – Section 2.3.2.1 & Appendix E - VOC control systems within the fume hoods – Section 2.3.2.1 - Details on all types of air and odour pollution treatment/ control equipment – Section 9 - Receptor types – Table 4 in Section 4.1 - Quantitative assessment of the air quality and odour impacts of the development on surrounding landowners – Table 11 in Section 7

Matter for Consideration	Response
equipment are in treating air and odour pollution to ensure that the proposal complies with the required air and odour Ground Level Concentrations. ▪ The consultant shall confirm the type of receptors (residential, school, childcare, businesses, etc) indicated in Table 3 Details of identified receivers. ▪ The consultant shall demonstrate that an air and odour impact assessment has been undertaken on future neighbouring tenants/occupants of the warehouses located at Horsley Logistic Park as they have not been identified as receptors. A quantitative assessment of the air quality and odour impacts of the development (construction and operation) on surrounding landowners, businesses and sensitive receptors, in accordance with the relevant Environment Protection Authority guidelines.	
The warehouse and/or site boundaries are capable of containing 702m³ which may be contained within the warehouse footprint, site stormwater pipe network and recessed docks or other containment areas that may be present as part of the site design. The civil engineers designing the site containment shall demonstrate the design is capable of containing at least 702m³.	The OSD volume can cater to 2,350m³ as shown in Civil Plan C42 in Appendix G. This design can cater to the suggested 702m³ as raised in Fairfield City Council's submission.



Matter for Consideration	Response
A stormwater isolation point (i.e. penstock isolation valve) shall be incorporated into the design. The penstock shall automatically isolate the stormwater system upon detection of a fire (smoke or sprinkler activation) to prevent potentially contaminated liquids from entering the watercourse.	Penstock isolation valve has been incorporated into the base design of the warehouse under SSD-10436. Therefore, the proposed use satisfies this requirement. Refer to Appendix F showing the design.
The Traffic Impact Assessment shall provide further information in relation to the number of heavy vehicles that will arrive and depart on an hourly basis throughout the day.	A breakdown of anticipated vehicle numbers and types has been provided as part of Ason's Response to Submission at Appendix B .
Heavy vehicles exiting the truck and car entry and exit driveway leading to and from Lot 201 as shown in the architectural plans is a safety concern the applicant shall provide swept path diagrams to demonstrate the largest vehicle (26m B-double vehicle) can satisfactorily turn into and out of the site to access Lot 201 warehouse 2A and 2B without crossing the double barrier lines on Johnston Crescent adjacent to the bend.	Warehouse 2A and 2B do not form part of this application. All swept path matters have been addressed as part of SSD-10436 Modification 1. Given no changes are proposed to the swept paths and hardstand, this comment is not relevant to this change of use application.
All issues raised by Transport for NSW must be satisfactorily addressed prior to determination.	Noted. All issues have been responded to as part of this RTS.
Sydney Water	



Matter for Consideration	Response
A feasibility application is recommended for the proposed development. Further data provision will be required to ascertain whether the proposed development can be serviced in a timely manner.	A pressure and flow enquiry statement has been issued by Sydney Water, which confirms there is adequate water within the existing street main for Jalco's use. If further information pertaining to Jalco's use is required, we request it form part of a Condition of Consent.