



## RESPONSE TO SUBMISSIONS – SSD-31552370 – 42 RAYMOND AVENUE, MATRAVILLE

Addendum to Engagement Outcomes Report

This addendum has been prepared by Urbis Engagement for Hale Capital Partners to outline the additional consultation undertaken to inform the SSD Application for the proposed multi-level industrial development at 42 Raymond Avenue, Matraville (the site).

The table below outlines a response to the submissions received where additional consultation was required.

Table 1 Additional consultation – Response to Submissions

Response to Submissions feedback	How this group was consulted	Feedback	Project response
<b>Ampol</b>			
<p>NSW Department of Planning and Environment Hazards and Risk requested formal consultation with Ampol:</p> <p>“3. The subject site is located approximately 130 m south-west of a pipeline corridor containing numerous high-pressure dangerous goods pipelines operated by Ampol. As such, the Applicant is required to consult with Ampol regarding the application and provide details of the consultation and confirmation of any impacts in the RTS.”</p>	<p>Hale Capital consulted with Ampol via email on 1 June 2022 to arrange a discussion about the proposal.</p>	<p><b>Feedback from Ampol included:</b></p> <p>Providing works remain within the property boundary at 42 Raymond Avenue, Matraville, Hale Capital will be clear of the Ampol pipelines located in McCauley Street and also the northern end of Raymond Avenue, Matraville.</p>	<p>Consultation undertaken with Ampol confirmed the site is not affected by Ampol assets (present up McCauley Street and crosses Raymond Avenue near Harold Street) and that there is no potential for impacts to the development.</p>

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<b>NSW Department of Planning and Environment: Hazards and Risk</b>			
<p>4. The subject site is located approximately 280 m south of Botany Industrial Park (BIP), outside the relevant individual risk contours of the 2018 BIP QRA, thus satisfying the individual risk criteria in the Department's Hazardous Industry Planning Advisory Paper No. 10, 'Land Use Safety Planning'. However, further information is required on how the proposed development will ensure compliance with the societal risk once operational (should development consent be granted). As such, the Applicant should verify the population associated with the operation aligns with the employment population limit, in response to the findings of the 2018 BIP QRA.</p>	<p>Hale Capital consulted with DPE via a meeting on 2 June 2022.</p> <p>The meeting was held with attendees from the following DPE teams:</p> <ul style="list-style-type: none"> <li>Planning</li> <li>Hazards and Risk.</li> </ul>	<p><b>The following feedback was discussed:</b></p> <ul style="list-style-type: none"> <li>The subject site is located at the edge of the Strategic Control Area, being the 300-400m boundary from Botany Industrial Park.</li> <li>The latest risk assessment for the BIP allows for 41.5 people/ha at the site, or 81 people on site at any one time.</li> <li>As a speculative development, tenants are not yet known. The site is currently estimated to provide approximately 210 jobs, likely operating over 2-3 shifts over a 24-hour period. 101 car parking spaces are proposed.</li> <li>Sherpa to undertake risk modelling to assess the level of risk at the site and determine future potential site capacity.</li> <li>Societal risk assessment to be submitted to DPE as part of Response to Submissions.</li> </ul>	<p>It is concluded in the provided Risk Assessment that the maximum anticipated population for the development proposal does not affect the cumulative societal risk presented in the BIP QRA 2018.</p>

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<b>Transport for NSW (TfNSW)</b>			
<p>Impact to the existing Botany Road and McCauley Street signalised intersection:</p> <ul style="list-style-type: none"> <li>The signalised intersection of Botany Road /McCauley Street is a major intersection used by high volumes of traffic where network safety and efficiency are of great importance.</li> </ul>	<p>Ason, on behalf of Hale Capital, consulted with TfNSW via email on 27 June 2022 as a response to submissions received on the SSDA.</p> <p>Consultation undertaken by Ason outlined a detailed response to each submission by TfNSW.</p>	<p><b>Feedback received from TfNSW notes:</b></p> <p>TfNSW has reviewed the report outlining a detailed response to each submission and is satisfied with the responses to the traffic related matters raised in the previous TfNSW submission.</p> <p>As a result of the above, TfNSW raises no objection to the proposed development.</p>	<p>Hale Capital will continue consulting with TfNSW throughout the approval process to keep them informed of any updates and changes to the proposal.</p> <p><i>Refer to the Response to Submissions report for detail on how each submission from TfNSW was addressed.</i></p>
<p>The Traffic Impact Assessment (TIA) has based generation rates from Technical Direction (TD2013-04a) using the average of two sites to adopt a generation rate of 0.32 trips per 100m<sup>2</sup>. However, these sites are at Eastern Creek and Riverwood. Given the importance of Botany Road for freight a higher rate is more appropriate of 0.52 vehicle trips per 100m<sup>2</sup> GFA for the AM and 0.56 vehicle trips per 100m<sup>2</sup> GFA for the PM peak hour as per the summary table in TD2013-04a.</p>			
<p>The TIA traffic generation has assumed 27-37% of trips from Botany Road (west) whereas based on the existing surveys the trip percentage patterns are approximately 50% for all peak hour periods from Botany Road (west). The percentage rates to be applied are; Botany Road (west) 50%, Botany</p>			

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Road (East) 7% and the remainder for Perry Street.			
The annual growth rate from 2021 to 2031 (based on TfNSW Sydney Strategic Model) is 2.2% and 1.7% for the AM and PM peak periods respectively.			
The setup parameters in the base model are not in accordance with the SCATS data, for example the cycle length should be 130 seconds. Individual phase times should be optimised for the base and future scenario comparisons. The Applicant can obtain further information regarding key input parameters via email scats.traffic.signal.data@transport.nsw.gov.au			
<p>It is noted that the intersection models are using default settings. The following modelling inputs should be addressed:</p> <ul style="list-style-type: none"> <li>actual grades should be used</li> <li>pedestrian walk and clearance times are too short</li> <li>pedestrian volumes are shown as 1 person</li> <li>consideration of Peak Flow Factors</li> </ul>			

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<ul style="list-style-type: none"> <li>truck speeds to be reduced to a more appropriate value</li> <li>late starts missing on A, B and C phase</li> <li>Amber time is 5 seconds and Red time 3 seconds for D phase.</li> </ul>			
<b>Heritage NSW: Aboriginal heritage</b>			
<p>HNSW notes that the EIS submitted for review includes a draft version of the ACHA (EIS 2022; Appendix AA) and incomplete information regarding the consultation undertaken with the Aboriginal community. Consequently, the EIS does not present current information about the potential impacts of the proposal on ACH as information contained in Section 6.1.15 of the EIS is outdated and incorrect. HNSW recommends this document be updated to include the finalised ACHA and any subsequent results from additional ACH investigation undertaken within the development area to provide an accurate summary of the potential ACH impacts of the proposal.</p>	<p>Hale Capital consulted with Heritage NSW via email on 14 June 2022 as a response to the submissions received on the SSDA.</p> <p>Email was to sent to address the submissions on the EIS and stated:</p> <ul style="list-style-type: none"> <li>The original EIS included a draft ACHA that was still with the RAPs for comment but following the close of Stage 4 of the consultation, since the final ACHA was uploaded to the department on the 4 May and will be added to the EIS as part of the</li> </ul>	<p><b>Feedback received from Heritage NSW includes:</b></p> <ul style="list-style-type: none"> <li>Heritage NSWs notes that based on this information and also from our previous discission, it is in support of the proposed approach.</li> </ul>	<p>Hale Capital will continue consulted with Heritage NSW throughout the approval process to keep them informed of any updates and changes to the proposal.</p>

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	response to submissions.		
HNSW supports the recommendation to undertake further ACH investigation in the form of test excavation within the curtilage of the proposal area. However, we are of the view where further primary ACH assessment is recommended, this should be completed as part of the EIS rather than being deferred until post-approval	<ul style="list-style-type: none"> <li>▪ The adequacy of the assessment of ACH, and the suggestion that the archaeological testing should be carried out as part of the EIS.</li> <li>▪ Urbis has carried out a detailed ACHA and carefully considered all options in consultation with the Registered Aboriginal Parties (RAPs). We strongly believe that our conclusions and recommendations to do the intrusive archaeological investigation post-approval and in coordination with the proposed construction would yield a better outcome.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Heritage NSWs notes Hale Capital is of the view that any intrusive archaeological investigation should be undertaken post-approval and in coordination with the proposed construction, as it would provide a better outcome in relation to providing an understanding of the ACH associated with the study area.</li> <li>▪ Heritage NSWs notes Hale is of the view that the proposed approach has the full support of the RAPs.</li> <li>▪ Heritage NSWs notes that based on this information and also from our previous discussion, it is in support of the proposed approach to managing the archaeological investigation process with respect to 42 Raymond Avenue, Matraville (SSD-31552370).</li> <li>▪ Noting Heritage NSW usually prefers up front testing to inform the EIS process. However, in</li> </ul>	
HNSW recommends that where there is uncertainty regarding potential impacts to ACH values and there is a recommendation to conduct further investigation via archaeological test excavations within the development area, this should be completed as part of the current ACHAR to inform the impact assessment for the project.			
HNSW recommends that the proponent undertake further ACH assessment to determine the nature and extent of potential subsurface deposits within the development area, in consultation with relevant Aboriginal parties, to adequately capture the information required to address the SEARs for the project and inform the EIS by the development of appropriate management and mitigation measures for any ACH values.			

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		this instance, Heritage NSW is satisfied that what is proposed is adequate and appropriate given the nature of the study area and the in line with the wishes of the RAPs.	
Ausgrid			
Ausgrid has reviewed the EIS and in particular Appendix DD - Service Infrastructure Assessment and has no further submission at this stage.  Ausgrid notes the proponent has made an initial application for connection to Ausgrid for the new development.  We encourage the proponent to continue to discuss their requirements directly with Ausgrid as needed.  No conditions recommended.	Hale Capital consulted with Ausgrid on 17 June 2022 in relation to the new substation design.	<b>Feedback from Ausgrid notes:</b>  Preference noted for kiosk location to be on the site boundary next to the road frontage.	Hale Capital notes the kiosk location to remain given the low voltage drop that will occur if relocated to the front boundary.
		Cable easement width noted as minimum 2m.	Hale Capital will incorporate amendments to the cable easement width into revised design.
		Right of Way (ROW) located with adjoining lot noted as insufficient for Ausgrid access requirements.	Hale Capital will allow for alternative ROW location next to cable easement as requested.
Sydney Water (SW)			
<u>Stormwater:</u> <ul style="list-style-type: none"><li>Requirements for Sydney Water’s stormwater assets (for certain types of development) may apply to this site. The proponent should ensure that satisfactory steps/measures will be taken to protect existing stormwater assets, such as</li></ul>	Hale Capital consulted with Sydney Water on 17 June 2022 in relation to the development, specifically requesting a meeting to discuss the proposal to	<b>Sydney Water feedback notes:</b> <ul style="list-style-type: none"><li>Sydney Water has been instructed not to organise meeting prior to receiving an application and Developer Services Representative of the</li></ul>	In response to SW’s feedback, Hale Capital is preparing the application and Specialist Engineering Report in accordance with the requirements outlined by Sydney Water.

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<p>avoiding building over and/or adjacent to stormwater assets including building bridges over stormwater assets. More information regarding Sydney Water's stormwater policy is available via the following web page Building over or adjacent to Sydney Water stormwater assets</p> <ul style="list-style-type: none"> <li>▪ Sydney Water notes the Applicant has been actively communicating with Sydney Water's Stormwater Team.</li> <li>▪ The proponent should also consider taking measures to minimise or eliminate potential flooding, degradation of water quality, and avoid adverse impacts on any heritage items, and create pipeline easements where required.</li> </ul>	<p>construct a retaining wall along the channel.</p>	<p>particular Case Number is to be presented in the meeting.</p> <ul style="list-style-type: none"> <li>▪ Sydney Water's requirements are that no brick/masonry or similar type of wall is to be proposed along the open stormwater channel which prevent flood water and overland flow through the fence.</li> <li>▪ If Sydney Water is to approve this retaining wall adjacent to Sydney Water's stormwater channel, it should satisfy the following conditions: <ul style="list-style-type: none"> <li>- A letter from Council or Determining authority that they have approved this retaining wall as part of this development</li> <li>- The retaining wall and its foundation/pier are minimum 1m away from the outside face of the stormwater channel to outside face of the foundation/pier.</li> </ul> </li> <li>▪ Sydney Water notes that it appears the proponent has</li> </ul>	



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		<p>some concern regarding the retaining wall, and it impacts on flooding.</p> <ul style="list-style-type: none"> <li>▪ Sydney Water notes as the BPA is biggest risk for this proposal, it could substantially impact on Sydney Water's assets.</li> <li>▪ Because of this, SW stated the need to lodge quickly according to BPA guidelines.</li> <li>▪ Risk assessment is primarily carried out by our Engineering. SW notes they will not give any comments without looking the full details of your proposal, the work methodology and its impact on Sydney Water assets, which is not possible prior to submitting the application with full details.</li> </ul>	