

Mr Richard Johnson
Director
Aspect Environmental Pty Ltd
117/25-27
Solent Circuit
BAULKHAM HILLS New South Wales 2153

07/09/2020

Dear Mr Johnson

Moorebank Intermodal Precinct West – Concept Plan and Stage 1 Modification 2 (SSD-5066-Mod-2) and Stage 2 Modification 1 (SSD-7709-Mod-1) – Response to Submissions

The exhibition of the modification applications including the Modification Reports for the above ended on 24 Aug 2020. All submissions received by the Department during the exhibition of the proposed modifications are available on the Department's website at www.planningportal.nsw.gov.au/major-projects/projects.

The Department requires that you provide a response to the issues raised in those submissions. The Department has identified the key issues as relating to matters including:

- Building height
- Noise
- Dangerous goods
- Traffic
- Infrastructure and services
- Social and economic impacts.

Further details on these concerns are also presented in Attachment 1. Please note that the comments from Rural Fire Service are outstanding. The Department will provide you with a copy of their submissions when received.

If you have any questions, please contact Nathan Stringer, who can be contacted on 9995 5531 or via email at nathan.stringer@planning.nsw.gov.au.

Yours sincerely



Karen Harragon

Director, Social And Infrastructure Assessments
Social & Infrastructure Assessments

as delegate for the Planning Secretary

Attached: Key Issues Raised

Attachment 1 – Key Issues Raised:

Building height and visual impact:

The proposed increase in building heights for warehouses 5 and 6 is a key concern raised during the exhibition of the modifications, which the Department requests you address. Additional information required to address these concerns should include, but not be limited to:

- Further justification of the proposed 45 m heights and subsequent non-compliance with the Liverpool LEP;
- Additional evidence to demonstrate that current approved warehouses height of up to 21 m would not be commercially viable (i.e. that the proposed height increase is required to ensure that the site is viable for future commercial operation);
- Address concerns that many of the perspectives included within the visual impact analysis that form part of the Mod are often shielded by development or trees, and provide additional perspectives from the Casula Powerhouse and Arts Centre, the Casula Parklands, and an additional visual receptor from Casula Road/Canberra Avenue, as requested by Council; and
- Address concerns regarding a lack of visual impact analysis undertaken from private properties at Casula including consideration of each of the visual impact perspectives provided as part of the original application.

Noise

Significant concerns have been raised regarding the proposed amendments to the operational noise criteria stipulated in Table 4 of condition B131 of SSD-7709. The Department requires you to address these concerns, including but not limited to:

- Impacts of increased noise levels on nearby residential amenity, including increased disturbance;
- Concerns that noise survey readings have not been undertaken at the most affected point on or within relevant property boundaries, and may not have taken into consideration the elevated nature of some private dwellings in Casula, which sit above street level. Council has advised that they have received offers from residents in Casula to allow the testing of noise levels within their properties;
- Demonstrate that where all loggers have been placed is “truly representative of the most affected residence” (Noise Policy for Industry); and
- Concerns regarding the impact of increased operational noise on Glenfield Farm, which is listed on the NSW State Heritage Register.

Dangerous Goods

The Department’s Hazards team has raised a number of concerns with regard to the Preliminary Hazard Analysis submitted as part of the Stage 2 Modification 1 application (SSD-7099-Mod-1). To address these, you are required to provide:

- Clear plans/diagrams indicating:
 - a. the location of the subject warehouses in context of the other warehouses within SSD-7709 and other land uses around SSD-7709;
 - b. the location of all dangerous goods and hazardous chemicals storages (class and maximum quantities) within the site plans of the subject warehouses and verify that this storage arrangement would be able to comply with the relevant Australian Standards; and
 - c. consequence areas and risk contours based on plans/diagrams a and b above;
- An analysis for full warehouse fire for the subject warehouses, including analysis of toxic combustion products from this fire, in view of the range of dangerous goods classes to be stored within the warehouses; and
- Revise the probabilistic risk analysis in the PHA to be consistent with the Department's HIPAP No. 4 frequency-based land uses safety risk criteria, and assess the cumulative risk from both subject warehouses to surrounding land uses against HIPAP No. 4.

Traffic

The Department notes Liverpool City Council's concerns that the traffic impacts that will arise as part of the proposed modifications are unclear, and requests that you address these concerns including through the provision of further information regarding the traffic implications of the proposal (in particular the increased building height and associated warehouse volume), as well as clarifying and detailing whether traffic arrangements would remain unchanged under the existing consents.

Infrastructure and Services

The Department notes concerns raised by Endeavour Energy that the Modification Reports submitted do not appear to address the potential impact of the requested modifications on the electricity infrastructure, as well as the suitability of the site for the development in regard to whether the availability of electricity services are adequate for the proposed development.

- The Response to Submissions should address whether or not the increased heights of warehouses 5 and 6 (and resulting higher volumes/density) may result in an increase in the peak demand at Anzac Village Zone Substation, and changes to the local network to accommodate higher loads.
- The Department requests that you address Endeavour Energy's request that the preliminary hazard assessment provided under the provisions of SEPP 33 addresses the risks associated with the proximity of the electricity infrastructure.

Social and Economic Impacts

- Please address the concerns raised by members of the public with regard to the impact that the proposed automated high bay warehousing may have on the overall employment benefits of the MPW site as was used to justify the original application.

- Provide updated operational employment numbers.