Your Ref: SSD 14221509 **Contact**: Andrew Mooney on 9725 0214

22 September 2021

Jeffery Peng
Locked Bag 5022
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Dear Mr Peng

250 VICTORIA STREET, WETHERILL PARK – STATE SIGNIFICANT DEVELOPMENT APPLICATION – SSD - 15221509

I refer to the above State Significant DA submitted by Woolworths for a warehouse and distribution centre at the above site.

As detailed further below, at this stage Council officers have a number of major concerns regarding the potential traffic impacts from the development on the surrounding road network/infrastructure, noise and vibration impacts on nearby sensitive receiver's and visual impacts of the proposal.

In particular, the traffic impact assessment report submitted for the proposal is considered inadequate and does not provide an appropriate analysis of the impacts of heavy truck movements on Redfern St and surrounding road network, including the capacity of the intersections of Redfern street with Hassall and Walter Street to accommodate both the extent and nature of truck movements (that includes B-double vehicles) proposed to service the facility.

Given the above issues as well as the scale and complexity of the proposal, Council has engaged the services of independent consultants to undertake a peer review of the traffic impact assessment and acoustic and vibration reports accompanying the proposal.

Council notes recent verbal advice from DPIE indicating that the context of any comments made at this stage cannot be altered following public exhibition. In this regard, given the concerns Council officers have in regard to the proposal, this submission represents an in principle objection to the potential detrimental traffic impacts of the proposal on the surrounding road network as well as the impacts on the acoustic and visual amenity of the area.

However, this in principle objection to the above impacts is qualified, and Council's final position is contingent on the findings and recommendations of the above independent peer reviews (that will referred to DPIE) as well as the response provided by the applicant to these matters.

In addition to the above, the following submission includes Council officer's comments and responses in relation to a number of important technical considerations relevant to the proposal including matters that require further clarification.

It is clear from this submission that the applicant also needs to give consideration to the need for significant road infrastructure upgrades to mitigate the impacts of the development on the surrounding road network and key intersections with Redfern/Hassall and Redfern/Walter Streets. In this respect, Council officers request clarification from Woolworths and DPIE on an appropriate mechanism and approach to fund the scope of infrastructure upgrades required to the support the proposal.

1. TRAFFIC IMPACTS

The following comments are provided by Council's traffic management section.

A. External road network - The applicant's traffic and access report has stated that vehicular access to the site will be provided from Victoria Street and Redfern Street. The employee car park will be accessed from Victoria Street. Truck, service and delivery vehicle access will be provided from Redfern Street.

   The development is proposed to operate 24 hours a day, seven days a week. The warehouse and distribution centre will operate with overlapping shifts with the number of employees varying from 90 to 425. It will replace a number of functions currently occurring at the Woolworths distribution centre at Minchinbury, as well as other distribution occurring from Arndell Park. Daily traffic generation of the warehouse and distribution centre would be some 3,400 vehicles per day two-way (including some 2,000 cars and 1,400 trucks). The Woolworths Distribution Centre at 250 Victoria Street Wetherill Park is anticipated to generate 185 trucks (two-way movements) during the peak hour of the day and 1400 truck movements daily.

   The applicant's traffic report - including SIDRA models state that traffic impacts of the development proposal on the adjoining road network will be minor as trucks can either travel to and from the site via the intersection of Walter Street/Redfern Street and Hassall Street/Redfern Street (signalised intersection).

   However, traffic generation associated with the development for the worst-case scenario (e.g. every 15-30 minutes) may not be reflected in the SIDRA model analysis as SIDRA software assumes uniform traffic distribution across a one-hour period. Due to the increased truck movements, traffic congestion is anticipated on the adjoining road network particularly during the peak hours of the day. Additional information such as a breakdown of a number of trucks is anticipated to travel to and from the site via Redfern Street on hourly basis on a typical day over a 24-hour period, shall be submitted to Council for assessment.

   Concern is raised that the applicant has not investigated measures in Redfern Street to reduce the impact on traffic flows at the intersection of Redfern Street/Walter Street and Redfern Street/Hassall Street. In light of the above, the TIA submitted for the application has referred to an independent traffic consultant for peer review.

   The Traffic and Access report for 250 Victoria Street Wetherill Park states that inbound deliveries to the distribution centre will be made by b-doubles up to 26 metres long. Outbound deliveries will be made by semi-trailers up to 20 metres long. All vehicles will enter and exit the site in a forward direction. Vehicle swept paths are shown in Appendix B.

The applicant needs to provide swept path diagrams to demonstrate that heavy vehicles including 19m semi-trailers and 26m B-Double vehicles can satisfactorily negotiate the nearby intersections (intersection of Walter Street/Redfern Street and Hassall Street/Redfern Street). This also needs to consider how the increased truck movements will be distributed over the intersections minimising potential traffic impacts on the adjoining road network.

Any changes required to the intersection layout (mitigation measures), installation of signs and line markings to facilitate the truck movements on a public road will need to be funded by the applicant and require support from the affected stakeholders and approval from the Fairfield Traffic Committee.

B. External road network- Traffic generated by the proposed development will have its greatest effects during the weekday morning and afternoon peak periods when it combines with other traffic on the surrounding road network. Based on surveys at Minchinbury and Arndell Park, the proposed development will generate:

- approximately 180 to 200 vehicles per hour two-way during the morning peak hour which comprises from 80 to 100 trucks plus 100 cars; and

- approximately 300 to 320 vehicles per hour two-way during the afternoon peak hour which comprises from 80 to 100 trucks plus 220 cars.

A breakdown of a number of trucks and their types and cars that is expected to travel to and from the site via Redfern Street and Victoria Street on a typical day over a 24-hour period shall be submitted to Council for assessment.

The significant increase in truck movements is likely to increase road pavement wear in the vicinity of the site in short and/or long term due to the increased axle loadings. In addition, there is an existing culvert on Redfern Street that is approximately 100 metres east of the intersection of Verrell Street which would be impacted by the increased heavy vehicle movements on Redfern Street. As such, Council's City Assets Branch have reviewed the matter and their comments are provided further on in this submission.

C. Internal layout of the site - Based on the applicant's swept path diagrams, the site does not make provision for designated bays to accommodate 26m B-Double vehicles to carry out loading and unloading activities. A loading management plan indicating the number of service vehicles which is anticipated to use the site on an hourly/daily basis and how all of the service vehicles will be managed within the site, shall be submitted to Council for assessment. Service vehicles shall only undertake loading and unloading activities from the service bay and shall not obstruct the flow of traffic into, within and out of the site.

The design of the truck ramps off Redfern Street indicating levels and grades to accommodate 19m semi-trailers and 26m B-Double vehicles shall comply with the requirements of AS 2890.2:2018 and the relevant Australian Standards. Longitudinal section of all the ramps that runs to and from the basement and first levels of the development indicating their levels and grades shall be submitted to Council for assessment;

The swept path diagrams submitted by the applicant shall also demonstrate that the 26m B-Double vehicles can satisfactorily turn into and out of the site without impacting road users on the external road network. For example, 26m B-Double vehicles and/or heavy vehicles will need to negotiate turning into and out of the site without being impacted by the parked vehicles on Redfern Street and without the need to encroach onto the path of oncoming traffic.

Installation of parking restrictions or removal of on-street parking on a public road requires support from the affected stakeholders and approval from the Fairfield Traffic Committee. In addition, concern is raised regarding the provision of three exit lanes for trucks to exit the development via Redfern Street and the conflicting movements at/near the exit driveway is a concern; and

The proposed site layout would make it inconvenient for heavy vehicles to access the hardstand area at the northern portion of the site. Heavy vehicles cannot immediately access this area after entering the site via Redfern Street due to the proposed one-way traffic flow restrictions within the site.

D. Car and Truck Parking Arrangements - The TIA states that the development complies with parking requirements for industrial developments as set out in the Fairfield City Wide DCP. It is unclear what the total breakdown of parking spaces are per vehicle type. Council officers require clarification on the number of onsite parking spaces that will be provided for all vehicle types accessing the site including but not limited to Heavy rigid vehicles including semi-trailers, B-double vehicles, light vehicles (including staff and operational vehicles) and medium rigid vehicles. Depot spaces for vehicles stored onsite should be specified for all vehicle types.

E. On-Street Parking Survey - It is clear that the development will have significant impact on Redfern Street by way of vehicle movements. The applicant is to undertake a vehicle parking survey covering Redfern Street for the 24/7 operational cycle of the development. The survey should be undertaken using data and traffic counts at pre COVID pandemic levels. The survey dates should exclude, school and public holidays, weekends and the December and January holiday periods. The results of the parking survey will inform the capacity of Redfern Street to accommodate traffic management measures and improvements to mitigate the traffic impacts of the proposal, including provision of additional turning lanes at the intersections of Redfern St with Hassall and Walter Street.

2. ASSET IMPACTS

A. Infrastructure Upgrades - Prior to approval, Council officers recommend a qualified civil engineer be engaged by the applicant to undertake further investigation to determine the necessary location of required future public civil infrastructure upgrades proximate to the site, in order to facilitate the developments operation. This assessment must include the following:

- Impact on existing road pavement and existing drainage structures such as stormwater pipes, pits culverts and bridges due to the heavy vehicle movement during construction and operation of the business.

- Extent of any existing damage that would enable any deterioration, during and after construction to be observed. (Please see potential operational and construction vehicle movements below).

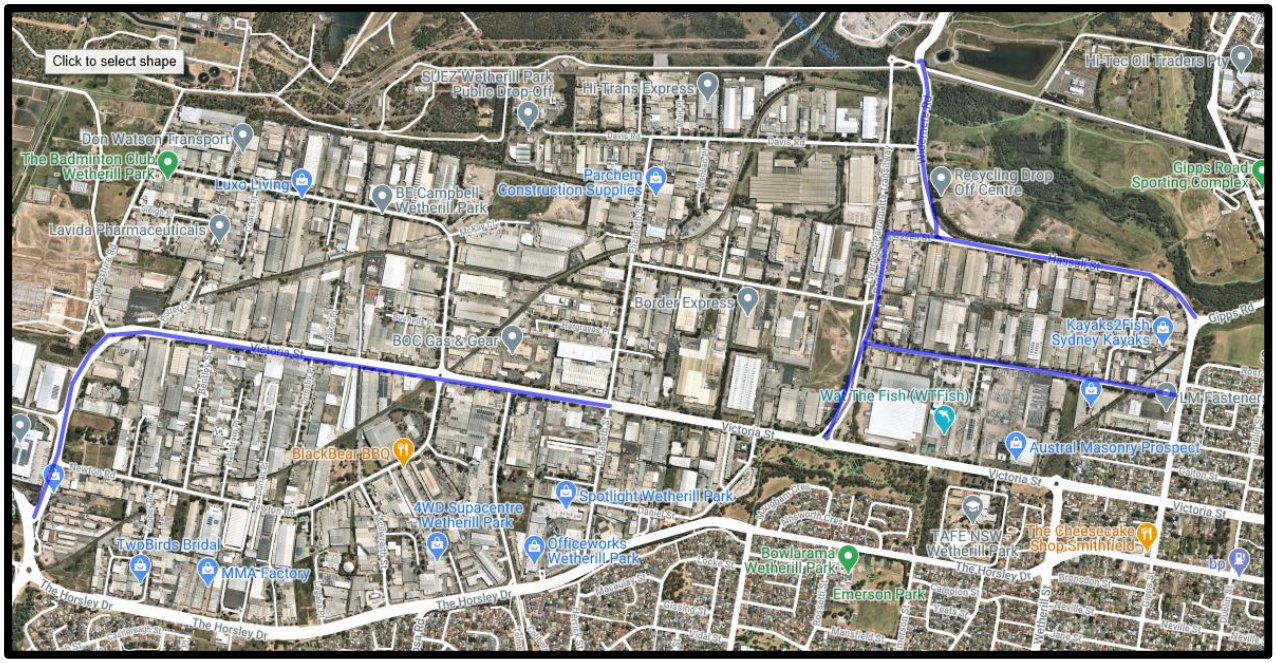


Figure 1 – potential operational and construction truck routes

Council's Assets Team require the applicant engage an experienced pavement design engineer to assess and provide a report in relation to the impact of the proposal on existing road pavement and existing drainage structures such as stormwater pipes, pits culverts and bridges in the surrounding road network for heavy vehicle movement during the construction phase of the project.

B. Upgrading Vehicle Routes - As there will be significant increase in heavy vehicle movement associated with the proposal there are likely to be impacts on various road infrastructure (e.g. pavement, stormwater pipes, culverts, bridges). Consideration must be given to upgrading Redfern Street and nearby local roads to cater for a higher mass limit (HML) during construction and operation of the facility.

This is due to the Equivalent Standard Axel Load (ESA) increasing by 0.8 x 10^7 ESA. Redfern Street and Walter Street currently operate at a 20 year design life of ESA 2 x 10^6, being below the standard to facilitate the proposal. Therefore, Council officer's request the applicant address what mitigation measures will be put in place for Council's local road infrastructure to ensure road surfaces are sufficient to support construction and operation of the proposal. In addition the following would be required:

- Kerb and gutter shall be constructed for the property frontage on Redfern Street, Wetherill Park at no cost to Council;

- A standard footpath shall be constructed for the property frontage on Redfern Street and Victoria Street at no cost to Council;

- Street lighting shall be improved in the vicinity of Redfern Street and Victoria Street near the entry and exit to 250 Victoria Street;

- Street furniture – New Bus shelters shall be incorporated in the in the vicinity of Redfern Street and Victoria Street as part of this proposal to enhance pedestrian safety for the bus routes bearing numbers of 814 and 816.

C. Pavement design - Shall comply with Austroads Guidelines "A Guide to the Structural Design of Road Pavements" and design for other proposed infrastructures shall comply with Council's design guidelines. Construction is required to comply with Council's road works specifications. These designs will be submitted to Council for review and approval.

D. Road Works Permit - In order to work on Council roads the applicant will need to apply for a road works permit. The dilapidation survey should include information in regard to each defect on the road surface, kerb and gutter and other associated assets and is to be prepared by a suitably qualified person. This process will establish the extent of any existing damage and enable any deterioration during and after construction to be observed. See Figure 2 below, showing the details of pipe culverts on Redfern Street and drainage pits and pipes:

Figure 2 – Details of Pipe Culvert on Redfern Street and Drainage Pits and Pipes

3. ENVIRONMENTAL IMPACTS

The following comments are provided by Council's Environmental and Public Health Branch:

A. The Noise and Vibration Impact Assessment (NVIA) - prepared by Renzo Tonin & Associates, dated 27 July 2021, document reference TL496-07F01 FP3 Wetherill Park 180D NVIA (r2).docx submitted as part of the SSD has been reviewed and the following comments are provided.

The development proposes the construction and operation of a multilevel warehouse and distribution facility at 250 Victoria Street, Wetherill Park.

The proposal seeks approval to operate 24 hours a day seven days a week, with a predicted daily traffic generation for the site being 3,400 vehicles per day two-way (including some 2,000 cars and 1,400 trucks). The site is located in immediate proximity to sensitive receivers such as residential dwellings, childcare centres and schooling institutes. Other nearby receivers to the proposed development are industrial premises.

Within the NVIA the consultant has recommended feasible and reasonable acoustic treatment and noise mitigation measures. The consultant concludes that, "*there are no additional measures that can be practically applied to the facility's design*". This raises concerns that should the proposed acoustic treatment and noise mitigation measures fail to mitigate any underestimated predicted operational noise levels generated by the use of the site, then how will any noise exceedances be further mitigated at the site so that sensitive receivers are not affected.

B. Recommendations No. 1 Noise and Vibration - Further to the above the following acoustic issues and concerns are raised and shall be addressed.

- Council does not agree with the shoulder period noise trigger level for receivers NCA1,NCA3, NCA4 & NCA5. As stated in the NSW EPA Noise Policy for Industry 2017 (NPfi), background noise levels steadily rising in the early morning hours (5am-7am). This does not appear to be the case for the project noise trigger level established for the shoulder period. (A copy of the table for reference is indicated below)

  The acoustic consultant shall provide further justification and calculations based on NPfi regarding the shoulder period noise trigger level for the following receivers NCA1, NCA3, NCA4 & NCA5. See table 1 below.

Table 3-14: Project noise trigger levels for residential receivers

Receiver location	$L_{Aeq,\ 15min}$ Project noise trigger levels, dB(A)							
	Day		Evening		Night		Shoulder period (5:00am to 7:00am)[1]	
	Intrusive	Amenity	Intrusive	Amenity	Intrusive	Amenity	Intrusive	Amenity
NCA1	52	58	52	48	50	43	52[2]	-[1]
NCA2	43	58	43	48	41	43	42	-[1]
NCA3	58	58	51	48	49	43	52	-[1]
NCA4	50	58	48	48	47	43	47	-[1]
NCA5	51	58	48	48	43	43	47	-[1]

Table 1 (3-14) project noise trigger levels

- In Section 4.5.2.3 Noise monitoring, bullet point 1, the acoustic consultant has recommended that noise monitoring procedures occur during construction works where potential noise impacts are predicted to be up to 10 dB (A) above noise criteria.

However the consult does not confirm how it will be determined if potential noise impacts are predicted to be up to 10 dB(A), therefore clarification is required to be provided by the consultant.

- Within Section 5.1.2.3 Carpark activities, bullet point 3 states that "*Staff are expected to turn left onto Victoria Street, and then could go multiple directions at the roundabout at the corner of Wetherill Street and Victoria Street. As such, it is assumed all vehicles could then travel either direction on Victoria Street from the roundabout, and so the numbers were evenly distributed in both directions for a conservative assessment*".

  Council believes that an even distribution in both directions is not a conservative assessment and that an assessment shall be carried out based on the worst case scenario.

- Limited information is present within Section 5.2 Operation noise sources, in particular reference to fix mechanical plant to be used at the site. The consultant shall elaborate and provide further details on the key noise generating plant and equipment to be used at the site.

- Within Section 5.2 Operation noise sources, the consultant did not take into consideration the noise generated when trailers or rigid trucks are cooling down as part of operational noise source. The consultant shall acoustically assess this and include it within the acoustic assessment.

- The consultant has recommended that broadband reversing alarms "quackers" shall be adopted across operational heavy vehicles instead of the tonal beeping alarms, as a noise mitigation measure. The consultation shall confirm how this mitigation measure will be implement and utilised by third party heavy vehicles that will have access to the site at multiple times throughout the day/evening/night.

- Within Section 5.1.2.2 Heavy vehicle traffic volume and composition, the consultant has provided Table 5-2 titled Predicted hourly heavy vehicles and composition. This table provides a breakdown of the amount of truck movements to occur each hour when the proposed development is in operation. 702 truck movements have been indicated to occur in this table.

  However a note at the bottom of this table states "these numbers represent the number of heavy vehicles, and the number of movements (ie. movements to the facility and from the facility) is double this number (ie. 702 heavy vehicles = 1,404 movements to/from the facility)". The consultant shall confirm that the total 1404 truck movements have been calculated in the noise assessment, as it is unknown when some trucks will return back to site from dispatch therefore potentially generating additional truck movements on site at the one time.

- The consultant shall confirm how frequent the emergency generator and emergency fire pump shall be tested (operated) and serviced each year and the length of time each service requires the equipment to be in operation.

C. External Peer Review - In addition to the above recommendations, the following relates to a further internal review due to the scale and complexity of the proposed development. Council lacks appropriate resources to critically assess the noise and vibration impact assessment (as Council does not have acoustic modelling software to verify the acoustic content, including methods to verify the appropriateness of noise mitigation measures proposed within the report) and it is strongly recommended that a suitably qualified acoustic consultant be engaged to critically assess the acoustic report and its content.

Due to the significant amount of daily truck and car movements and 24 hour seven days a week proposed operational use, significant concerns are raised that the proposal may increase noise levels within the area and potentially cause offensive noise to sensitive receivers.

It is also noted that a review of the NSW EPA's submission for the proposal has revealed that the Appropriate Regulatory Authority (ARA) for this development during construction and operation would be Council. As a result any/all noise complaints received, investigated and any enforcement undertaken would be by Council.

Therefore it is essential to have this NVIA thoroughly assessed to ensure that the contents of this report is accurate, in that it reflects the correct noise levels for the area and clearly addresses all additional traffic and operational noise generated by the proposed development.

The acoustic review will also need to verify if the proposed acoustic treatment and mitigation measures are adequate to ensure that the project noise trigger level are achieved.

D. Air Quality Impact - An Air Quality Impact Assessment prepared by Northstar Air Quality Pty Ltd, dated 8 July 2021, report reference 21.1058.FRV3 has been submitted as part of the SSD. The report has been reviewed and the following comments have been provided:

This Air Quality Impact Assessment (AQIA) has been submitted to present an assessment of the risks to local air quality associated with the construction and operation of the proposal. This AQIA is to support the proposal and presents recommended mitigation measures (during construction only) to minimise any identified air quality impacts, where required and relevant.

The consultant has identified receptor locations used in the study which is present in Section 4.1.2 of the report. However when reviewing the information there is no reference of the childcare centre which is located immediately across the road approximately 30 metres from the proposed development and Wetherill Park Tafe institute which is also located on the same parcel of land.

As a result, the consultant will need to confirm and demonstrate that the childcare centre and Wetherill Park TAFE have been included as sensitive receivers and that an air quality impact assessment for the air pollutants of concern and dust has been undertaken on these receivers.

The consultant has identified that during the operation of the proposal, the following activities are anticipated to result in potential emissions to air:

- Movement of vehicles around the internal roadways of the proposal site on paved road surfaces,

- Diesel combustion emissions from the consumption of diesel fuel, in the truck movements importing and exporting materials. The potential emissions would include particulate matter (as PM_{10} and $PM_{2.5}$) and oxides of nitrogen (NO_X), including nitrogen dioxide (NO_2).

  The consultant has stated that there would additionally be some less significant emissions of carbon monoxide (CO), sulphur dioxide (SO_2) and air toxics (including benzene and 1,3-butadiene) but for the purposes of this assessment, it is comfortably assumed that the principal gaseous pollutant would be NO_X.

The consultant further states that "*experience in performing assessments of the impact of combustion-related emissions from the use of vehicles indicates that the principal indicator pollutants are particulate matter (PM_{10} and $PM_{2.5}$) and NO_2 associated with relevant short-term criteria. NO_X/NO_2 concentrations have been used within this assessment as an indicator pollutant for all other combustion-related gaseous emissions resulting from traffic*".

Section 7 Interpretation of dispersion modelling results, of the NSW EPA document tilted "Approved method for the modelling and assessment of air pollutant in New South Wales, states that:

"The primary purpose of an air quality impact assessment is to determine whether emissions from a premises will comply with the appropriate environmental outcomes". The assessment criteria is present within the document.

"To ensure the environmental outcomes are achieved, emissions from a premises must be assessed against the assessment criteria. The cumulative impact of emissions from several facilities also needs to be considered. Impacts of sulfur dioxide (SO_2), nitrogen dioxide (NO_2), ozone (O_3), Lead (Pb), particles ($PM_{2.5}$ and PM_{10}), total suspended particulates (TSP), deposited dust, carbon monoxide (CO) and hydrogen fluoride (HF) must be combined with existing background levels before comparison with the relevant impact assessment criteria".

As a result one would believe the consultant should demonstrate that an assessment was undertaken on the emission for sulphur dioxide and carbon monoxide which is a pollutant emitted by cars and trucks in particular due to the close proximity of the childcare centre and residential receivers.

When reviewing other documentation submitted with this SSD, there is reference made to Ethylene gas used to ripen fruit on the site. The consultant has not discussed if this process is a potential source of air and/or odour pollution. This therefore raises concerns that the consultant potentially may not be aware of all the operational activities for this proposed development.

The consultant has stated that "*the operation of the Proposal site is considered not likely to be significantly odorous. All goods would be stored within the warehouse and any waste materials would be stored appropriately and removed from site on a daily basis".* In light of the above, odour has not been considered further as part of this AQIA.

The consultant also stated that "*given the nature of the development at this site, it is not anticipated that odour would be emitted in any significant quantity during construction*". In the absence of a modelling assessment, the construction phase impacts associated with the proposal were assessed using a risk-based assessment procedure. The consultant has stated that the advantage of this approach is that it determines the activities that pose the greatest risk, which allows the Construction Environmental Management Plan (CEMP) to focus controls to manage that risk appropriately and reduce the impact through proactive management.

Within Section 5.2.2 Emissions estimation of the report, the consultant has stated that data was provided by the applicant to approximate the activities being performed on the site on a day-to-day basis.

The consultant has advised that a total of 920 heavy vehicle are calculated to visit the site and that a total of 56 loading bays are associated with the proposal. However this information is inconsistent with other documents that have been submitted in support of this SSD. The following information has been found:

- The traffic Impact Assessment submitted with this SSD stated that predicted daily traffic generation for the site being 3,400 vehicles per day two-way (including some 2,000 cars and 1,400 trucks). The Nosie and Vibration Impact Assessment has also stated that there will be 1404 truck movements (two-way) at the site each day;

- The submitted plans indicates that there will be a total of 70 loading bays and this doesn't include an additional 8 loading bay (technically 78 loading bay in total) that are associated with the waste returns transfer facility section;

- The submitted plans also indicate that there will be a basement car park for staff and a basement truck repairs/truck wash/truck parking area. One could safely assume that both basement areas would have mechanical ventilation extraction devices that would remove air pollutants from within the basements via an exhaust duct to a discharge points (somewhere on the site) and into the atmosphere. One would assume that the air quality impacts for the pollutants emitted by this mechanical ventilation devices should also be assessed within the report;

- A 60,000 litre diesel storage tank and bowser is proposed to be used at the site.

E. Worst Case Scenario - The consultant has stated that the assessment needs to assess a potential likely worst case scenario, especially to allow determination of the possible short term (1-hour) impacts at nearby receptor locations.

In this regard, an assumption has been made by the consultant that all 56 bays would be occupied simultaneously, and that the vehicles would be idling for a period of 10 minutes within each hour which in the consultants opinion is considered representative of average loading / unloading times.

It should be noted that table 5.2 Predicted hourly traffic volumes and composition (page 62) present in the Noise and Vibration Impact assessment displays that between 3:00pm and 4:00pm there is a predicted total of 61 heavy vehicle movements on the site.

The note at the bottom of this table states the following "*These numbers represent the number of heavy vehicles, and the number of movements (ie. movement to the facility and from the facility) is double this number (ie. 702 heavy vehicles = 1,404 movements to/from the facility)*". It is undersood that during this period of time there may be in excess of 61 truck movements on site between 3:00pm and 4:00pm.

As mentioned above, the floor plan indicate that there is in excess of 70 loading bays proposed for the proposed development. From all the obtained information, it appears that the consultant has underestimated the sites operational activities and has not assessed the potential likely worst-case scenario for the proposed site. The consultant will need to review the information for the proposal to reflect a more accurate worst-case scenario for the site and then assess the predicted air pollutant emission levels from the site.

The consultant has identified that during demolition, earthworks and construction there is a high risk of adverse dust soiling and high risk for human health impacts at sensitive receptors, if no mitigation measures were to be applied to control emissions associated with earthworks and construction activities. Truck-out activities are associated with a medium risk of dust soiling impacts and human health impacts

In Section 6.5 Identified Mitigation of the report, the consultant has provided a number of dust mitigation measures which will need to be implement in the Construction Environment Management Plan. It has also been stated that a detailed review of the recommendations would be performed once details of the construction phase are available. It is also noted that one mitigation measures in particular, identifies the development and implementation of a Dust Management Plan. It should be noted that this will need to be captured and conditioned if the proposal is to be approved in the future.

The consultant concludes that given the size of the Proposal site, the distance to sensitive receptors and the activities to be performed, residual impacts associated with fugitive dust emissions from the Proposal would be anticipated to be 'negligible, should the implementation of the mitigation measures outlined within the report be performed appropriately.

As mentioned above the consultant will need to confirm that the childcare centre located directly across the road has been considered as a receiver and that an assessment of dust impacts from the proposal during construction has been undertaken on the childcare.

Within Section 7 Operational air quality impact assessment of the report, the consultant presents the results of the dispersion modelling assessment and displays the incremental impact (which is the concentrations of pollution predicted as a result of the operation of the proposal in isolation) and the cumulative impact (which is the background air quality concentration plus the incremental impact levels).

As mentioned above, the consultant has underestimated the activities to occur on site therefore the predicted emissions are also underestimated. This resulting in the assessments reported incremental impacts for the proposal being deemed invalid/inaccurate. Summarised results for this assessment is provided below:

The consultants advises that the results indicate that predicted incremental concentrations of TSP, PM_{10} and $PM_{2.5}$ at residential receptor locations are low (less than (<)2% of the annual average TSP criteria, ≤ 1.8% of the annual average PM_{10} criteria and ≤ 2.1% of the $PM_{2.5}$ criterion). The addition of existing background concentrations results in predicted concentrations of annual average TSP being < 52 % and annual average PM_{10} being ≤ 89.4 % of the relevant criteria, at the nearest receptors. The existing adopted annual average $PM_{2.5}$ background concentration is shown to be in exceedance of the relevant criterion, even without the operation of the proposal added.

The consultant stated that an examination of the predicted $PM_{2.5}$ impacts which would result from the operation of the proposal, indicates that these concentrations are predicted to be ≤ 0.2 $\mu g \cdot m^{-3}$ at all surrounding receptors. The consultant states that the performance of the proposal does not in itself result in any exceedances of the annual average particulate matter impact assessment criteria

The annual average dust deposition is predicted to meet the criteria at all receptors surrounding the proposal site where the predicted impacts are less than 11 % of the incremental criterion at receptor locations.

The consultant states that the performance of the proposal does not result in any exceedances of the annual average dust deposition impact assessment criteria

The predicted maximum 24-hour average PM_{10} and $PM_{2.5}$ concentrations resulting from the operation of the Proposal, with background are presented in Table 21 and Table 22 within the report. The consultant states that these results as presented, demonstrate that even with the addition of background concentrations, the cumulative impacts are not in exceedance of the relevant criterion.

The consultant concludes that the performance of the proposal does not result in any additional exceedances of the maximum 24-hour average particulate matter impact assessment criteria. The consultant further states that “the analysis indicates that no exceedances of the 24-hour average impact assessment criteria for PM_{10} or $PM_{2.5}$ are likely to occur, as a result of the operation of the Proposal. Examination of the results for all receptors indicates that no additional exceedances of the PM_{10} or $PM_{2.5}$ criteria are predicted at any receptor location”.

The results indicate that predicted incremental concentrations of combustion-related pollutants (characterised by NO_2), are below the criteria at all surrounding receptor locations. At the worst affected receptor (R3) and for the pollutant with the highest predicted concentrations (1-hour maximum NO_2), predicted increments are shown to be less than 32 % of the relevant criterion as a result of the proposal. It has been concluded that the performance of the Proposal does not result in any exceedances of the criteria for combustion related pollutants.

The consultant states that "based on the findings of the air quality impact assessment, it is considered that the level of activity being performed at the Proposal site would result in minor incremental impacts at all surrounding receptor locations". In the case of predicted incremental annual average particulate matter concentrations (as TSP, PM_{10} and $PM_{2.5}$), the predicted ground-level concentrations are predicted to be low:

- TSP: 1.8 µg·m-3;
- PM10: 0.4 µg·m-3; and
- PM2.5: 0.2 µg·m-3.

In the case of predicted incremental 24-hour average particulate matter concentrations (as PM_{10} and $PM_{2.5}$), the predicted ground-level concentrations are predicted to be minor:

- PM10: 1.5 µg·m-3; and
- PM2.5: 0.6 µg·m-3.

Accounting for the background air quality assumptions, the assessment does not predict any additional exceedances of the respective criteria as a result of the operation of the Proposal. In regard to nitrogen dioxide, the predicted maximum increment 1-hour and annual average predictions are 76.9 µg·m-3 and 2.6 µg·m-3 respectively. Accounting for the relevant background assumptions, the assessment does not predict an exceedance of the relevant impact assessment criteria.

The consultant states that there is no specific mitigation measures to be required to minimise impacts on surrounding receptor locations. Good site management practices, including the observation of speed limits on site, and the minimisation of vehicle use (through avoidance of engine idling) would be sufficient to ensure that no off-site impacts are experienced.

It was also stated that taking into consideration the minor incremental contribution of the proposal to air quality impacts in the surrounding area, no air quality monitoring is required or proposed, for either the construction phase or the operational phase.

In conclusion the consultant states "*It is demonstrated that the operation of the Proposal does not cause any exceedances of the air quality criteria. It is respectfully suggested that the SSD application should not be refused on the grounds of air quality issues"*.

F. Recommendations No. 2 Air Quality Impact - In light of the above information, there are a number of concerns raised which requires further clarification, information and assessment from the consultant. The following is required to be addressed and submitted to the Council for review and comment:

- The consultant shall clearly demonstrate that the childcare centre which is located immediately across the road (approximately 30 metres) and Wetherill Park Tafe institute which is also located on the same parcel of land have been identified and included as sensitive receivers in the Air Quality Impact Assessment. The consultant will need to confirm/demonstrate that an air quality impact assessment for dust and the air pollutants of concern proposed to be generated during construction works and during operational activities at the proposed site has been undertaken on these identified receivers.

- In accordance with Section 7 Interpretation of dispersion modelling, in the NSW EPA document titled "Approved method for the Modelling and Assessment of Air Pollutants in New South Wales (dated 2016), the consultant shall demonstrate that the emissions for sulphur dioxide and carbon monoxide (which is a pollutant emitted by cars and trucks) including any other pollutant to be emitted from the operational activities of the site have also been assessed and comply with the required impact assessment criteria.

- When reviewing the information submitted with this SSD, there is reference made to Ethylene gas used to ripen fruit on the site. The consultant has not mentioned/discussed if this process is a potential source of air and/or odour pollution. As a result the consultant shall assess the process and confirm if the proposed use of Ethlyene gas shall be a source of air and/or odour pollution.

- Within Section 5.2.2 Emissions estimation of the report, the consultant has stated that data was provided by the applicant to approximate the activities being performed on the site on day-to-day basis. The consultant has advised that a total of 920 heavy vehicle are calculated to visit the site and that a total of 56 loading bays are associated with the proposal.

- The consultant has further stated that *"this assessment needs to assess a potential likely worst case scenario, especially to allow determination of the possible short term (1-hour) impacts at nearby receptor locations"*. In this regard, an assumption has been made by the consultant that all 56 bays would be occupied simultaneously, and that the vehicles would be idling for a period of 10 minutes within each hour which in the consultants opinion is considered representative of average loading / unloading times.

- However when reviewing this information with other documentation that has been submitted in support of this SSD there are some inconsistencies found indicating that the worst-case scenario for the site hasn't been predicted and that it has been underestimated. The following information has been found in documentation submitted with this SSD:

    - The Traffic Impact Assessment submitted with this SSD stated that predicted daily traffic generation for the site being 3,400 vehicles per day two-way (including some 2,000 cars and 1,400 trucks).

- The Noise and Vibration Impact Assessment (NVIP) submitted with this SSD has also stated that there will be 1404 truck movements (two-way) at the site each day. Within the NVIP, Table 5.2 Predicted hourly traffic volumes and composition (page 62) is present which displays a breakdown of truck movements on site for each hour throughout the day. Between 3:00pm and 4:00pm there is a predicted total of 61 heavy vehicle movements on the site.

- There is also a note at the bottom of this table which states the following "*These numbers represent the number of heavy vehicles, and the number of movements (ie. movement to the facility and from the facility) is double this number (ie. 702 heavy vehicles = 1,404 movements to/from the facility)*". It is understood that during this period of time there may actually be in excess of 61 truck movements on site between 3:00pm and 4:00pm each day due to not knowing when trucks may return from dispatch.

- The submitted plans indicate that there will be a total of 70 loading bays (first floor plus second floor) and this doesn't include an additional 8 loading bays (technically 78 loading bay in total) that are associated with the waste returns transfer facility section.

- The submitted plans also indicate that there will be a basement car park for staff and a separate basement for truck to be repaired, washed and parked. One could safely assume that both basement areas would have mechanical ventilation extraction devices that would emit air pollutants from within the basements via an exhaust duct to a discharge points and into the atmosphere.

- A 60,000 litres diesel tank is proposed to be used on site for the refuelling of trucks.

- From the above information, it appears that the worse-case scenario for the site predicted by the consultant has been underestimated and doesn't show a true representation of the potential emissions by the proposed site when in use.

  In this regard a review of all relevant information including a detailed review of the plans is required to identify all sources of air pollution and demonstrate that the submitted Air Quality Impact Assessment has been undertaken and based on the potential likely worst-case scenario when the site in in operation. In addition the assessment should also include but not be limited:

  - An assessment of air emissions due to proposed car/vehicle movements on the propose site,
  - An assessment on the basement activities that may generate emissions and assess the basements mechanical ventilation discharge points to ensure that predicted air pollutant levels to be discharge from any exhaust discharge points does not affect nearby receivers.
  - Should the revised Air Quality Impact Assessment (to address all concerns identified above) identify exceedances of the impact assessment criteria, then recommendations for air pollutant mitigation and best management practices to minimise emissions of air pollutants shall be provided to demonstrate compliance with the impact assessment criteria requirements and the NSW EPA air quality standards and goals.

G. Recommendations No.3 Diesel Tank There is limited information on the proposed 60,000L diesel tank. The following information is unknown and is required to be provided by the applicant:

- The location of the diesel storage tank to be shown on the architectural drawing.
- Is the diesel tank proposed to be above ground or underground?
- Will the diesel bowser and fuelling area be covered with an awning and bunded to ensure that the area is not affected by rain and that any spills can be contained?
- A spill kit is required to be present on site, in close proximity to the diesel bowser and its location to be shown on the architectural drawing.

H. Recommendations No.4 Truck Wash and Truck Repairs Area In Basement - The truck wash and truck repair area located on site also has limited information provided. The following information is to be submitted by the applicant:

- Confirmation that the truck wash will be connected to an oil water separator. The location for the oil water separator shall be shown on the architectural drawing. The oil water separator shall also be bunded to ensure that any spills can be contained.
- The applicant will be required to have a trade waste agreement with Sydney water.
- The truck wash shall be designed and bunded to prevent any wastewater from entering into the stormwater drainage system.
- Chemical storage areas for the mechanical truck repairs area and truck wash shall be shown on the architectural drawing. Any chemical storage area shall be bunded to ensure that any spills are contained on site.

I. Recommendation No.5 Plan Of Management - The applicant shall submit a Plan of Management (operations plan) that includes (at minimum) details on:

- Comprehensive daily routine
- Noise management practices,
- A complaints handling procedure
- Yearly Environmental Audit to be undertaken by a qualified environmental consultant.

The Appropriate Regulatory Authority (ARA) for this development during construction and operation would be Council. Due to the scale and complexity of the proposed development the site will be subject to ongoing yearly environmental audits to ensure the site complies with the relevant legislation relating to, noise, air and water. This is to ensure the use of the premises does not interfere with the amenity of the area and operation is carried out in an environmentally satisfactory manner.

J. State Environmental Planning Policy (SEPP) 33 - Hazardous and Offensive Development - The facility will be required to ripen fruit, ethylene gas will be used which is a Class 2.1 Dangerous Good (DG) and a refrigeration system with ammonia which is a Class 2.3 gas. As DGs will be stored and handled, the site is assessed against the SEPP 33 to determine whether the risk profile of the site is suitable for the land zoning.

A review of the quantities of DGs stored at the proposed warehouse and the associated vehicle movements was conducted by Riskcon Engineering Pty Ltd and compared to the threshold quantities outlined in Applying SEPP 33. The results of this analysis indicates the threshold quantities for the DGs to be stored and transported are not exceeded; hence, SEPP 33 does not apply to the project. As the facility is not classified as potentially hazardous, it is not necessary to prepare a Preliminary Hazard Analysis for the facility as SEPP 33 does not apply.

Riskcon Engineering Pty Ltd, dated 23 July 2021 recommends the documentation required by the Work Health and Safety Regulation 2017, applicable to the site DG storage(s), shall be prepared for the site prior to occupation.

K. SEPP 55 Land Contamination - The below reports have been submitted as supporting documentation for the State Significant Development in relation to the contamination status of the site.

- An Additional Site Investigation, prepared by JKEnvironments dated 23 March 2021, Ref: E31888Brpt2;
- A Remediation Action Plan prepared by JKEnvironments dated 30 March 2021, ref: E31888BrptRev1-RAP,and;
- Site Audit Report Remediation Action Plan, prepared by Ramboll Australia Pty Ltd, dated 13 April 2021, Project number 318001137.

A review of the NSW EPA website confirmed that the site auditor is accredited with the NSW EPA. The site auditor has reviewed the below documentation:

- Report to Fabcot Pty Ltd on Preliminary Stage 2 Environmental Site Assessment for Due Diligence, Proposed Highbay Distribution Warehouse at 250 Victoria Street, Wetherill Park, NSW' 18 October 2018, Environmental Investigation Services (EIS) (the PESA);
- 'Report to Fabcot Pty Ltd on Additional Site Investigation, Proposed Distribution Centre Development at 250 Victoria Street, Wetherill Park, NSW' 23 March 2021, JK Environments Pty Ltd (JKE, formerly EIS) (the ASI);
- 'Report to Fabcot Pty Ltd on Acid Sulfate Soil Assessment, Proposed Distribution Centre Development at 250 Victoria Street, Wetherill Park, NSW' 16 March 2021, JKE (the ASS Assessment),and;
- 'Report to Fabcot Pty Ltd on Remediation Action Plan, Proposed Distribution Centre Development at 250 Victoria Street, Wetherill Park, NSW' dated 30 March 2021 (and a draft dated 26 February 2021), JKE (the RAP).

The site auditor's recommendations are also accepted as they wish to ensure that the site is remediated and validated in accordance with SEPP 55 resulting in the land being suitable for the proposed commercial use.

4. VISUAL IMPACTS

The development includes a total building height ranging from approx. 12m toward Victoria Street up to 42m over a large portion of the site. In addition, a 230m long acoustic wall is proposed along the Victoria Street frontage (setback 10m from the street) ranging in height from 7.6m to 20m.

The site also has a prominent location being located at the edge of the Wetherill Park industrial area and in close proximity to residential development to the east and south east as well as a large public open space area (Wetherill Park Reserve) to the south west.

The above location and built form characteristics of the proposal mean that it will have a significant visual impact on the surrounding area, exacerbated by the fact that adjoining industrial development has a much lower bulk and scale to the proposed distribution centre.

Woolworths needs to have further regard to measures to mitigate the visual impacts of the proposal, such as dispersing the bulk and scale of the development across a larger portion of the site, enhancing the amount/nature of landscaped measures and relationship of the proposed built form at the interface with nearby residential and open space areas.

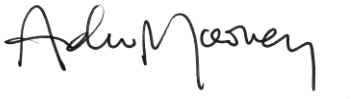
CONCLUSION:

Council officers acknowledge the benefits of the proposed Woolworths warehouse and distribution centre at 250 Victoria St, Wetherill Park. However, as detailed in this submission there are a number of concerns in relation to traffic, road infrastructure, noise, vibration and visual impacts that require further attention by the applicant.

The nature and extent of these impacts also warrant Council officers making an in principle objection to the potential negative impacts of the proposal. This position is qualified and depends on the additional advice and recommendations of the peer reviews commissioned by Council into these issues and the applicant's response.

Should you have any questions please do not hesitate to contact the undersigned on 9725 0214.

Yours faithfully



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