

Mr Nick Carnovale
Senior Design and Project Manager
Austrak Management & Consulting
Level 25
35 Collins Street
MELBOURNE VIC 3000
11/03/2021

Dear Mr Carnovale

Austrak Business Park (DA253-8-2002-Mod-4)
Request for Additional Information

I refer to the Department's assessment of the modification application for the Austrak Business Park (DA253-8-2002-Mod-4). After careful consideration, the Department is requesting that you provide further information as detailed in Attachment 1.

Please note this is not an exhaustive list of issues and you may be required to provide further information in response to issues raised by Government agencies, Council or the public or to further information requested by the Department.

You are requested to provide the information, or notification that the information will not be provided, to the Department by Tuesday 6 April 2021. If you are unable to provide the requested information within this timeframe, you are requested to provide, and commit to, a timeframe detailing the provision of this information.

If you have any questions, please contact David Koppers, who can be contacted on 9373 2869 or at david.koppers@planning.nsw.gov.au.

Yours sincerely,



Joanna Bakopanos
Team Leader
Industry Assessments

ATTACHMENT 1

1. Traffic and Parking

- a) It is noted that no reversing / parking analysis for 26 m B-Double heavy vehicles has been provided. It is understood this is because such vehicles do not utilise the loading / unloading docks. Could you confirm this is the case? Additionally if this is the case, the site plans should be amended to show designated loading / unloading areas for 26 m B-Doubles which demonstrate that the parking of these vehicles does not impact the operation of the loading / unloading docks or the ability for other vehicles to safely manoeuvre around parked vehicles?
- b) Confirm that the multi-level car park adjacent to the Unilever Streets Processing Facility will not be constructed and that this modification seeks to remove it from the consent?
- c) It appears the new multi-level car park (based on the swept path analysis) will give rise to potential traffic conflict issues between oncoming traffic on the 90^o bends. You are requested to confirm if this is the case and how this will be adequately managed to prevent incidents occurring. Alternatively, the design should be amended to remove this potential conflict.
- d) The Traffic Impact Assessment (TIA) has not considered the impact of construction traffic on the local road network and shall be updated to address this omission.
- e) The Department notes the TIA indicates that traffic observations took place in April 2020 which corresponded with the State-wide lock down in response to COVID 19 and observations made during this period are not considered to be representative of actual traffic movements. It is noted that no traffic count data has been supplied and the Department would strongly urge the provision of relevant information to inform the TIA. In lieu of a relevant data set an applied growth rate of 1.5% would be consistent with recent assessments undertaken by the Department.

There does not appear to be evidence to support the statements that – the intersection of Magnum Place / Pembroke Road operates well during peak periods, or that it is expected to operate similarly to what was previously assessed. Will the intersection continue to operate a Level of Service B during both the AM and PM peaks? The Department notes

that other intersections such as Pembroke Road and Rose Payten Drive have not been considered.

2. Sustainability

- a) It is noted that no type of solar power generation is proposed for either Building Two or Three. Given the likely power consumption required for the development, justification for not providing an alternative sustainable power supply is requested.

3. Visual Impacts / Building Height Exceedance

- a) Confirm the Reduced Levels (RLs) for the uppermost point on Buildings One, Two, Three and the new multi-level carpark and office building. Please provide the RLs for the Pembroke Road centreline and rear residential property boundary adjacent to the southern boundary of the site. The RL locations are to be illustrated on Drawing No – 18-102-00-020.

4. Air Quality

- a) The Air Quality Impact Assessment (AQIA) has not considered the existing operations of the site and a cumulative assessment is to be provided which addresses all current and proposed site operations (this does not include the Unilever Streets Processing Facility). In addition, there is inadequate justification or evidence to support not assessing onsite vehicle emissions. The argument that they will be minimal when compared to emissions generated by traffic on Pembroke Road is not relevant nor supported by evidence. The AQIA is to be revised to address these matters.

5. Hazards

- a) It is unclear whether the three refrigeration systems (existing and proposed) will be integrated and become a single refrigeration system with a total anhydrous ammonia of 8.5 tonnes. If this is the case the entire facility will be potentially hazardous as the threshold for anhydrous ammonia is five tonnes under State Environmental Planning Policy No. 33 (Hazardous and Offensive Development) (SEPP 33). If the system is to be integrated, the current SEPP 33 report will need to be revised to include risk analysis and demonstrate release of anhydrous ammonia would comply with the risk criteria.

6. Noise

- a) Clarification is sought in relation to the Noise Impact Assessment (NIA) and in particular the selection of urban/ suburban amenity noise levels. In section 5.4.2, the NIA states the residential area is classed as 'suburban', however, Table 10 uses an 'urban' classification to assess the predicted impact of the modification. The Department notes that for the

night-time criterion, receivers along Pembroke Road comply with 'urban' but not 'suburban'.

- b) Table 17 of the NIA states that the assessment of LAeq only considered 'steady' sources of noise. Intermittent noise peaks from loading/unloading and reversing alarms would also affect the LAeq noise levels. This should be justified or revised accordingly.
- c) Table 18 presents the sound power levels assumed in the operational noise predictions. Truck pass-by of 100 dB(A) was derived from LAeq measurement reported in Table 3 rather than the maximum pass-by sound pressure level. LAeq emission from a line source (that is, for moving sources) should be based on the maximum pass-by sound power level, vehicle speed and the source path length. There is also not enough information to determine what each machinery is doing and whether the variety of proposed activities performed by each machinery can indeed be represented by a single sound power level. The oversimplification of modelling parameters is unlikely to result in accurate operational noise predictions.
- d) Table 3 of the NIA presents the summary of operator attended on-site noise measurements which only reported LAeq and LA90 descriptors. As such, measurements and reporting of noise levels have not been undertaken in accordance with AS 1055:2018 Acoustics - Description and measurement of environmental noise. Please reference the relevant International Standard for determining sound power levels of moving equipment under dynamic test conditions.
- e) There is no evidence to justify the exclusion of modifying corrections for annoying noise characteristics and this should be revised.

Intended hours of construction are to be confirmed.