

27 October 2021

2200495

Bruce Zhang
Planning and Assessments
Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

Dear Bruce,

SSD-5248-MOD-1, 813-913 WALLGROVE ROAD, HORSLEY PARK REQUEST FOR ADDITIONAL INFORMATION

This letter has been prepared to respond to the Request for Additional Information made by the Department of Planning, Industry and Environment in relation to SSD-5248-MOD-1 for the Gazcorp Industrial Estate at 813-913 Wallgrove Road, Horsley Park.

The issues raised by the Department are set out below, together with Gazcorp's response. Accompanying this letter are the following:

- Attachment A: Air Quality Impact Assessment, prepared by SLR and dated October 2021.
- Attachment B: Supplementary construction traffic assessment, prepared by Ason, dated 25 October 2021.
- Attachment C: Supplementary flood impact assessment, prepared by BMT, dated 25 October 2021.

1.0 Construction Programme

The Department requested further information on the construction programme for the Stage 1 development as it is proposed to be modified, including details of any staging of the works and time to complete the different components, with comparison to the timeframe for the approved development.

A description of the Stage 1 earthworks, as proposed to be modified, is provided below:

- The Stage 1 earthworks are anticipated to take place over approximately 9 months, which is similar to the timeframe initially expected for the Stage 1 earthworks as approved. The Stage 1 earthworks will be carried out more efficiently than originally approved, albeit more intensively, facilitated by a better cut-to-fill balance across the site.
- The cut-to-fill balance will mean no off-site haulage of bulk fill materials. However, the site will need to import approximately 100,000 tonnes of engineering specified materials for benching and grading, which would occur for approximately 3 months. During this time haulage trucks would operate at approximately 6 vehicle movements per hour and up to 60 truck movements per day.
- More extensive civil works will also be required to deliver all internal roads and stormwater infrastructure as part of Stage 1, although the timeframe for completing this aspect of the works is not expected to change significantly – at approximately 12 months.
- There will be no change to the construction works associated with the building on Lot 10 – which is anticipated to be approximately 9 months.
- Stage 1 earthworks will be carried out concurrently with the intersection works at the proposed Southern Link Road and Wallgrove Road intersection. There is no change to the intersection works as part of the modification – and these are expected to be carried out over a 12 month period.
- The proposed working hours for the period of earthworks are 7:00am to 6:00pm, Monday to Friday, and 8:00am to 1:00pm on Saturdays, and no work to be conducted on Sundays or public holidays. There is no change from

the approved Stage 1 earthworks, and these hours are consistent with the working hours set out in Condition C57.

- Access to the site for the Stage 1 earthworks would be via Wallgrove Road using a left-in / left-out arrangement. This is in accordance with the access and egress contemplated for the existing approval and no change is proposed as part of the modification.

2.0 Air Quality

The Department requested further consideration of the potential air quality impacts of the modified Stage 1 development, including justification for not completing an Air Quality Impact Assessment.

An Air Quality Impact Assessment (AQIA) has been prepared by SLR to assess the construction phase air quality impacts of the Stage 1 development as it is proposed to be modified (see **Attachment A**). The assessment carried out within the AQIA is a qualitative assessment method in accordance with the Institute of Air Quality Management's *Guidance on the assessment of dust from demolition and construction*. The IAQM method uses a four step process, as follows:

- Step 1: Screening based on distance to the nearest sensitive receptor; whereby the sensitivity to dust deposition and human health impacts of the identified sensitive receptors is determined.
- Step 2: Assess risk of dust effects from activities based on the scale and nature of the works, which determines the potential dust emission magnitude; and the sensitivity of the area surrounding dust-generating activities.
- Step 3: Determine site-specific mitigation for remaining activities with greater than negligible effects.
- Step 4: Assess significance of remaining activities after management measures have been considered.

The AQIA indicates that even if no dust controls are applied, the risks of adverse dust soiling and human health impacts are Low to Medium as follows:

- Low risk at all residential receptors during the earthworks, construction and trackout phases.
- Medium risk at commercial receptors during the earthworks and construction phase, and low risk during trackout phase.

It is highlighted that the IAQM method relies on the following parameters:

- Earthworks: The metric is the total area of earthworks, where 'Large' is categorised as a site larger than 10,000 square metres. On this metric, the categorisation of the site earthworks as having a 'Large' potential dust emission magnitude does not change between the approved development and the development as it is proposed to be modified by Modification 1.
- Construction: The metric is building volume. The building volume under Stage 1 of approximately 48,000 square metres is not proposed to change as part of Modification 1, and is categorised as 'Medium' potential dust emission magnitude.
- Track out: The metric is the number of truck movements per day, which are estimated as over 50 during the course of the construction period. The number of truck movements is categorised as 'Large' potential dust emission magnitude, and is not proposed to change as part of Modification 1.

Table 6 of the AQIA sets out a suite of site specific management measures recommended by the IAQM guideline, and the AQIA re-assesses the potential impacts after the application of these measures – concluding that the potential impacts are negligible at all residential receptors, and low risk at commercial receptors during the earthworks and construction phases.

Condition C56 of the development consent requires the preparation of a Construction Air Quality Management Plan prior to the commencement of construction works. The site specific management measures recommended by the IAQM guideline, as set out in Table 6 of the AQIA, will be incorporated into the Construction Air Quality Management Plan.

3.0 Traffic Assessment

The Department requested an assessment of the potential impacts of construction traffic on the surrounding road network, including a break down of vehicle types, and including a daily maximum, with consideration of access arrangements prior to the new site access being constructed.

A supplementary construction traffic assessment, dated 25 October 2021, has been prepared by Ason, and is provided at **Attachment B**. The Ason assessment is based on more current and accurate construction estimates that have been developed as detailed construction planning has progressed. As documented in **Attachment B**, it is confirmed that the number of heavy vehicles will remain at a maximum of approximately 60 heavy vehicles per day during the busiest part of the Stage 1 earthworks, being for the import of engineering specified materials, which would occur for approximately 3 months. This equates to approximately 6 heavy vehicle movements per hour (3 in and 3 out). It is highlighted that this is consistent with the already assessed and approved peak construction truck movements of 60 per day – albeit that the previous peak was originally predicted to occur during the construction of the building of Lot 10. As such, the predicted peak truck movements will not increase, but will occur for more of the Stage 1 construction period.

Attachment B also specifies that the haulage route would be via Wallgrove Road, using a left-in / left-out arrangement.

4.0 Flooding

The Department requested further clarification regarding the potential on and off-site flooding impacts of the modified development.

A supplementary flooding impact assessment, dated 25 October 2021, has been prepared by BMT and is provided at **Attachment C**. The supplementary BMT assessment confirms the following:

- The final design of the swale in the south east corner of the site will be consistent with the hydraulic parameters of the approved swale.
- Post-development flood conditions outlined in the 2015 Hydraulic Modelling and Impact Report (which formed Appendix J of the Response to Submissions Report for SSD 5248, and was prepared by BMT) would generally be applicable for the modified design to the south-east and east of the site and in areas downstream.
- Predicted flood impacts associated with the modified design would be similarly consistent with the findings of the 2015 Hydraulic Modelling and Impact Report.

BMT has recommended that the final design of the swale is verified against the approved parameters at the detailed design stage.

5.0 Other Requested Changes to Conditions

We also provide the following comments and suggested changes on the existing and proposed draft conditions of consent associated with the modified development. Each suggested change to the existing (or proposed draft) conditions of the consent is accompanied by a reason. In general, the changes are intended to reflect the proposed new staging of the construction works.

- Existing Condition A12: Remove the words “prior to the commencement of Stage 1” and replace with the words “prior to the commencement of construction of the building on Lot 10”.

Reason: This information is not necessary for the commencement of site-wide bulk earthworks.

- Proposed Condition A13A: Remove the words “Prior to the commencement of bulk earthworks” and replace with “Within six months of commencement of bulk earthworks” or “Prior to the commencement of construction of the building on Lot 10”.

Reason: The initial draft provided said “Within six months of commencement of bulk earthworks” and we are comfortable with this, but Gazcorp intend to commence bulk earthworks imminently and the need to resolve the noise assessment issues prior to commencement of earthworks will certainly delay the earthworks unreasonably and unnecessarily. In reality, this condition would provide very little benefit to Gazcorp in terms of addressing the time pressure that it is intended to resolve.

- Condition A14: Delete.

Reason: Since the bulk earthworks and civil works are being completed up front as a single stage of works, there is no reason for a Staging Plan. Delivery of individual lots will essentially be in response to the market.

- Condition C24: Remove words “Before the issue of a Subdivision or Construction Certificate for any stage of the development” and replace with “Before the issue of a Subdivision Certificate or the commencement of construction of the building on Lot 10”.

Reason: This detail will be agreed with a prospective future tenant, and is not available or required to commence site-wide bulk earthworks.

- Condition C33: Delete.

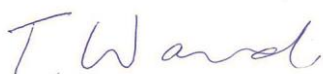
Reason: This is a standard condition that makes sense in the context of carrying a single development with direct connection to Wallgrove Road, however we are constructing a new intersection under the terms of a Works Authorisation Deed with TfNSW (RMS) – per condition C34 and C35. Conditions C31 and C32 also enable TfNSW to regulate the access arrangements to the site during construction. As such, Condition C33 is unnecessary and redundant.

- Condition C85: Remove the words “Prior to the commencement of construction” and replace with “Prior to the commencement of construction of the building on Lot 10”.

Reason: This detail will be agreed with a prospective future tenant, and is not available or required to commence site-wide bulk earthworks

6.0 Conclusion

We trust that this information is sufficient to enable a prompt assessment of the proposed modification. Should you have any queries or concerns in relation to the matters addressed in this letter, we would request a meeting so we can resolve issues in a timely manner. Otherwise, if you have any other queries regarding the above matters, please do not hesitate to contact the undersigned.



Tim Ward
Director, Planning
0450 133 453
tward@ethosurban.com