

# Letter



Date: Friday, 25 February 2022

The Trust Company (Australia) Limited

C/- Frasers Property Industrial, Level 2, 1C Homebush Bay Drive, Rhodes NSW 2138

FAO: Paul Solomon

<b>Project Name:</b>	<b>Proposed Modification to SSD9522 – Air Quality and GHG</b>
<b>Reference:</b>	<b>22.1019.FL1V3</b>
<b>Status:</b>	<b>FINAL</b>

Please find overleaf a summary of the review performed in relation to the proposed modification to approved State Significant Development 9522, and a specific review of proposed activities as part of Lot 2 and Lot 4.

If you require any further information or clarification, please do not hesitate to contact the undersigned at your convenience.

For and on behalf of

**Northstar Air Quality Pty Ltd**

A handwritten signature in black ink, appearing to read 'M Doyle'.

**Martin Doyle**

**Director**

Reviewed by: LS

## 1. INTRODUCTION

The Trust Company (Australia) Limited has engaged Northstar Air Quality Pty Ltd (Northstar) to provide supporting documentation relating to air quality and greenhouse gas, for a proposed modification to the Kemps Creek Warehouse, Logistics and Industrial Facilities Hub (State Significant Development [SSD 9522]), also known as 'the Yards', located at 657-769 Mamre Road, Kemps Creek, NSW.

The proposed modification relates to warehouses in the northeast corner of the Yards development (approved Lots 1 to 4). The warehousing and office area approved across Lots 1 to 4 of SSD 9522 are a total of 80 195 m<sup>2</sup><sup>1</sup>.

A quantitative air quality impact assessment (AQIA) was performed for SSD 9522 MOD 1, which assessed the potential impacts on local air quality resulting from the construction and operation of that development, including impacts of vehicle movements and truck idling during operation. A greenhouse gas assessment (GHGA) was also performed for SSD 9522 MOD 1 which quantified the potential emissions of GHG during the operation of the approved development.

This letter has been provided to identify any changes to the approved development, in light of the proposed modification, and assess whether any material change would result to both air quality and greenhouse gas impacts.

Tenants for the proposed Lot 2 and Lot 4 of the Yards are proposed as Symbion, who pack, store, and distribute pharmaceutical goods, and HCL, respectively. This letter is provided to identify any additional emissions not quantified within the AQIA and GHGA for the approved SSD 9522 MOD 1.

## 2. APPROVED DEVELOPMENT

The Yards was approved under SSD 9522 in December 2020 for the purposes of warehousing, logistics and industrial facilities.

Northstar performed an AQIA to support a modification to SSD 9522 (MOD 1) in November 2020 (ref 21.1041.FR1V3, dated 23 February 2021). Impacts associated with construction and operation of the Yards were identified, assessed and discussed. The operational impacts assessed included the movement of heavy vehicles around the Yards, associated with Lots 1-6, and Lot 8, and idling of heavy vehicles at loadings bays at warehouses within those Lots. Given that the tenants of each warehouse/industrial facility were unknown at the time of submission of the AQIA to support SSD 9522 MOD 1, no detailed assessment of impacts associated with individual tenants was provided at that time, although general recommendations for air emission minimisation were provided.

The AQIA for SSD 9522 MOD 1 was performed on the assumption that the area of buildings on Lots 1 to 4 was 80 375 m<sup>2</sup>, with 68 associated loading docks, and an associated 1 912 heavy vehicle trips each day.

The AQIA provided to support SSD 9522 MOD 1 indicated there to be a low risk of health or nuisance impacts during construction works.

The AQIA also indicated there to be no exceedances of the relevant air quality criteria for particulate matter (PM) and nitrogen dioxide (NO<sub>2</sub>) as a result of the operational activities assessed. These conclusions are consistent with the AQIA submitted to support SSD 9522 (as approved).

A GHGA was also submitted to support SSD 9522 MOD 1, which indicated that the development targeted a 6-star Green Star rating, and GHG emissions when compared to national and state totals, were anticipated to be minor.

### 3. PROPOSED MODIFICATION

#### 3.1. Lots 1 to 4

The proposed modification for Lots 1 to 4 is associated with minor locational changes in Lot layout. A comparison of the Lot areas and associated number of loading docks, as proposed and as approved under SSD 9522 MOD 1 is presented in **Table 1**. Critically, the total building area of Lots 1 to 4 and number of loading docks under the proposed modification is lower than that approved under SSD 9522 MOD 1.

**Table 1 Comparison of Approved SSD 9522 MOD 1 and proposed modification (Lots 1 to 4)**

Lot	Parameter	Assessed under SSD 9522 MOD 1	Proposed modification	Change
1	Building area	24 810 m <sup>2</sup>	3 657 m <sup>2</sup>	-21 153 m <sup>2</sup>
	Loading docks	19	7	-12
2	Building area	23 685 m <sup>2</sup>	29 226 m <sup>2</sup>	+5 541 m <sup>2</sup>
	Loading docks	16	22	+6
	Heavy vehicle trips	570 per day	157 per day	-413
3	Building area	17 560 m <sup>2</sup>	10 651 m <sup>2</sup>	-6 909 m <sup>2</sup>
	Loading docks	19	7	-12
4	Building area	14 140 m <sup>2</sup>	27 156 m <sup>2</sup>	+13 016m <sup>2</sup>
	Loading docks	19	12	-7
Total	Building area	80 375 m <sup>2</sup>	70 684 m <sup>2</sup>	-9 691 m <sup>2</sup>
	Loading docks	68	48	-20

**Note:** No heavy vehicle trip data available for as yet un-tenanted Lots 1, 3 and 4

<sup>1</sup> <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-9522%2120210122T010030.194%20GMT>

### 3.2. Lot 2

Lot 2 of the Yards is proposed to be occupied and operated by Symbion, a national wholesaler of healthcare services and products. Symbion proposes to use the warehouse and office facilities at Lot 2 of the Yards to pack, store, and distribute pharmaceutical goods. No manufacture of pharmaceutical goods is proposed at this location, and emissions would be limited to those resulting from vehicle deliveries, which have already been assessed under the approved SSD 9522 MOD 1.

Additional emissions not assessed in the AQIA supporting the approved SSD 9522 MOD 1 are odours potentially resulting from kitchen operation (staff canteen), and emissions from the operation of small emergency back-up generators.

### 3.3. Lot 4

Lot 4 of the Yards is proposed to be occupied and operated by HCL, an IT services and digital solutions company. No manufacture of goods is proposed at this location, and emissions would be limited to those resulting from vehicle deliveries, which have already been assessed under the approved SSD 9522 MOD 1.

Additional emissions not assessed in the AQIA supporting the approved SSD 9522 MOD 1 are odours potentially resulting from kitchen operation (staff canteen), and emissions from the operation of small emergency back-up generators.

## 4. POTENTIAL CHANGES IN IMPACTS

### 4.1. Lots 1 to 4

Data presented in **Table 1** confirms that the area under development, and number of loading bays associated with Lots 1 to 4 are significantly lower than that subject to assessment under approved SSD 9522 MOD 1. Therefore, any air quality and greenhouse gas impacts resulting from the construction and operation of those Lots, as a whole, will be lower than that approved.

Considering that the proposed modification as a whole (Lots 1 to 4) shows reductions in building areas and loading docks (approved versus proposed), any increases in individual Lot sizes are offset against the total under the proposed modification and any impacts upon the wider area are anticipated to remain materially the same. No further assessment is considered to be required to support the proposed modification.

### 4.2. Lot 2

The proposed use for Lot 2 of the Yards is generally consistent with that approved under SSD 9522 MOD 1.

Minor emissions of odour from the proposed staff canteen would not be anticipated to result in any offensive odour at offsite locations, and no quantitative assessment is required. Installation and operation of kitchen ventilation systems and points of emission would be performed in accordance with relevant Australian Standards, which would be anticipated to be sufficient to appropriately manage any impacts.

The requirement for emergency backup power generation through three small 614 kW biodiesel fuelled generators is not anticipated to result in any significant emissions to air. Information provided by the Proponent indicates that the generators to be installed would be the 706 Kva Scania Super Silent model. The generators would be used for approximately 40 hours per year for the purposes of back-up (emergency) power generation, responding to high price events in the National Electricity Market, peak demand control, and routine testing. Based on that usage profile, a total of approximately 5 100 L of biodiesel would be expected to be combusted each year. As the generators would be anticipated to be used for significantly less than 200 hours each year, they would not therefore be scheduled as an 'electricity generation' activity under the *Protection of the Environment Operations Act 1997*, and the standards of concentration as outlined in Schedule 6 of the Protection of the Environment (Clean Air) Regulations 2021 would not be applicable. Given the anticipated low usage of these small generators, impacts on surrounding areas would be anticipated to be minimal.

The combustion of 5 100 L of biodiesel each year would result in the emission of  $< 0.5 \text{ t CO}_2\text{-e}\cdot\text{annum}^{-1}$ , which equates to an increase in emissions associated with the approved SSD 9522 MOD 1 of  $< 0.01 \%$ , and can be considered to be a negligible increase. The conclusions of the GHGA would remain unchanged.

### 4.3. Lot 4

The proposed use for Lot 4 of the Yards is generally consistent with that approved under SSD 9522 MOD 1.

Similar to Lot 2, minor emissions of odour from any staff canteen would not be anticipated to result in offensive odour at offsite locations, and no quantitative assessment is required. Installation and operation of kitchen ventilation systems and points of emission would be performed in accordance with relevant Australian Standards, which would be anticipated to be sufficient to appropriately manage any impacts.

As for Lot 2, the requirement for emergency backup power generation through three small 614 kW biodiesel fuelled generators (identical configuration and usage profile to Lot 2) is not anticipated to result in any significant emissions to air. For clarity, as the generators would be anticipated to be used for significantly less than 200 hours each year, they would not therefore be scheduled as an 'electricity generation' activity under the *Protection of the Environment Operations Act 1997*, and the standards of concentration as outlined in Schedule 6 of the Protection of the Environment (Clean Air) Regulations 2021 would not be applicable. Given the anticipated low usage of these small generators, impacts on surrounding areas would be anticipated to be minimal.

The combustion of 5 100 L of biodiesel each year would result in the emission of  $< 0.5 \text{ t CO}_2\text{-e}\cdot\text{annum}^{-1}$ , which equates to an increase in emissions associated with the approved SSD 9522 MOD 1 of  $<0.01\%$  ( $<0.02\%$  taking Lot 2 and Lot 4 together), which can be considered to be a negligible increase. The conclusions of the GHGA would remain unchanged.

## 5. CONCLUSION

This review of the proposed modification to SSD 9522 MOD 1 has determined that the air quality and greenhouse gas impacts associated with Lots 1 to 4 would be anticipated to be materially the same than those previously assessed, reported and approved.

In relation to Lot 2 and Lot 4, the proposed activities are not anticipated to result in any material change to the predicted air quality or greenhouse gas impacts of the development as a whole, and no further assessment is considered to be required.