

Department of Planning and Environment

Our ref: SSD-31552370

Ms Alana Garrick
Development Manager
Hale Capital Partners Pty Ltd
246 Pacific Highway
Crows Nest NSW 2065

Attention: Ms Holly Rhoades, Urbis

23 May 2022

Subject: Raymond Avenue Warehouse, Matraville (SSD-315523370) Request for Additional Information

Dear Alana,

I refer to the Environmental Impact Statement (EIS) for the State Significant Development (SSD) application for the above proposal. After careful consideration, the Department is requesting that you provide additional information.

You are requested to submit additional information that effectively addresses the issues identified by the Department in **Attachment 1** specifically regarding the key concerns of societal risk from the Botany Industrial Park, traffic, operational noise, water quality, flooding and visual impact.

The Department requires that you provide a response to the issues in **Attachment 1** of this letter and those identified in previous correspondence dated 6 May 2022 in your Response to Submissions, in accordance with clause 82(2) of the Environmental Planning and Assessment Regulation 2000.

Regarding the concerns around the Quantitative Risk Assessment model for the Botany Industrial Park (BIP) and a limit on the population density, The Department is happy to facilitate a meeting to discuss how the proposed operation aligns with the employment population limit, in response to the findings of the 2018 BIP QRA.

At the time of writing, the Department has not yet received responses from Ausgrid. However, the Department is in the process of following up this agency. Any submissions received Ausgrid will be provided upon receipt. It is expected any issues identified are addressed within your Response to Submissions.

If you have any questions, please contact Catriona Shirley on 9995 6869 or via email at Catriona.shirley@dpie.nsw.gov.au.

Yours sincerely,



Chris Ritchie
Director
Industry Assessment

Department of Planning and Environment

as delegate for the Planning Secretary

Attachment 1 Department of Planning and Environment Comments on EIS

Hazard and Risk

1. The Environmental Impact Statement (EIS) is silent on Chapter 3 of the Resilience and Hazards SEPP, specifically around the storage of dangerous goods (DG). As a result, clarification for potential DG storage for the four tenancy operations is required.
2. If DG are to be stored within any tenancies a preliminary risk screening in accordance with the Department's *Applying SEPP 33* is required. When undertaking preliminary risk screening, the Applicant must consider the operations of the 4 separate tenancies occupying the building. If the application is determined to be potentially hazardous, the Applicant must submit a preliminary hazard analysis (PHA) in accordance with the Department's *Hazardous Industry Planning Advisory Paper No. 6, 'Hazard Analysis'*.
3. The subject site is located approximately 130 m south-west of a pipeline corridor containing numerous high-pressure dangerous goods pipelines operated by Ampol. As such, the Applicant is required to consult with Ampol regarding the application and provide details of the consultation and confirmation of any impacts in the RTS.
4. The subject site is located approximately 280 m south of Botany Industrial Park (BIP), outside the relevant individual risk contours of the 2018 BIP QRA, thus satisfying the individual risk criteria in the Department's *Hazardous Industry Planning Advisory Paper No. 10, 'Land Use Safety Planning'*. However, further information is required on how the proposed development will ensure compliance with the societal risk once operational (should development consent be granted). As such, the Applicant should verify the population associated with the operation aligns with the employment population limit, in response to the findings of the 2018 BIP QRA.

Traffic, Vehicle Access

The Department notes the traffic modelling undertaken for the EIS does not provide an accurate evaluation of the traffic impacts on the surrounding road network and intersections, nor accurately consider changes in heavy vehicle configuration and the ability of immediate existing road infrastructure to accommodate high productivity vehicles such as B-doubles. In addition to traffic issues raised by Transport for New South Wales, Council and local residents, the Applicant is to address the following:

5. Amend the TIA to account for the additional impacts of rigid trucks, semi-trailers and B-doubles on immediate intersection performance with reference to the existing traffic flow, composition and road configuration.
6. The EIS and TIA acknowledge access to the site via Raymond Avenue is not a B-Double approved route. As a result, specific analysis regarding the two possible assessment scenarios i.e., the proposal utilising B-doubles and not utilising B-doubles must be provided. Each scenario should provide accurate evaluation of the traffic impacts on the surrounding

Department of Planning and Environment

road network and intersections, and accurately consider changes in vehicle configuration and the ability of immediate existing road infrastructure to accommodate identified vehicles composition.

7. Update the information presented in Part 4.3.3 of the TIA to show passenger car equivalent units and a breakdown of vehicle of the expected traffic generation for each scenario over a 24-hour period.
8. In addition, the EIS and TIA do not provide any commentary regarding how the proposed shared access arrangements would mitigate conflicts between cars and heavy vehicles.
9. Part 9.3.5 of the TIA indicated construction workers will be able to park on the site as parking areas become available, plans of this proposed staged parking arrangement is required. It is unclear where construction workers will park their vehicles prior to the establishment of parking areas or after these areas are no longer available. If off-site, describe how construction workers will be transported to site.

Operational Noise

It is requested the Applicant provide the following information in the RTS to address public concerns around 24-hour operational noise:

10. The potential increase in traffic noise is cited as a source of noise concern by residents living in close proximity to the subject site. The TIA details night-time exceedance for receiver R03 caused by a combination of noise from the roof mounted fans, on-site truck movements (hardstand) and loading activities. Further clarification is required to verify if the accelerating and decelerating articulated vehicles and small rigid trucks, as they utilise the key access ramps to level one, have been included as a night-time source.
11. Additionally, feasible and reasonable noise mitigation measures such as at-property treatments along the access ramps may be required to minimise night-time noise impacts.

Air Quality Impact

The following information is required clarify details contained within the air quality assessment:

12. Further clarification on how the proposed site management measures would be implemented in practice to ensure that no off-site impacts would be experienced. In areas of elevated background concentrations, the EPA guideline for air quality and assessment advises an applicant should demonstrate that no additional exceedances of the impact assessment criteria will occur as a result of the proposed activity and that best management practices will be implemented to minimise emissions of air pollutants as far as is practical.

Aboriginal cultural heritage

13. Please provide a finalised version of the Aboriginal Cultural Heritage Assessment (ACHA) as part of the RTS report. The RTS report should clearly describe how the finalised ACHA and

its associated recommendations have influenced the design, construction and operation of the proposed development.

Section 88B Instruments and Easements

14. The submitted survey and EIS detail multiple easements. Clear and detailed information is sought advising which easements are to be moved, which easements are to be extinguished and how the site intends to satisfy any legal requirements of any instruments existing on the site to accommodate the proposed development.

Flooding and Stormwater

15. The subject site is affected by overland flow flooding as determined within the Birds Gully Flood study (Randwick Council 2018). The proposal includes introducing fill and capping above the existing slab level. Due to the mapped overland flow, and the proximity to the open Bunnerong Stormwater Channel a Flood Impact Study and associated Flood Risk Management Plan is required to be submitted.

Earthworks

16. The proposal includes a retaining wall along the north-western, south-eastern and south-western boundaries up to 3.0m in height. Please clarify how earthworks will be carried out in a coordinated manner, particularly considering level differences between the site, the Bunnerong Stormwater Channel and adjoining properties to ensure level transitions can be provided.

Urban Design / Visual Impact

17. The proposal includes significant bulk and scale due to the large footprint, height and lack of landscaped area around the proposal. Whilst the proposal remains compatible with the visual bulk and scale of surrounding existing and approved buildings in the IN1 zone, the façade design does not go far enough to respond to the visual amenity impact to the streetscape and viewpoints that will adjoin the site. Design alternatives that minimise the visual impacts including improved façade design and finishes (as a priority) are recommended.
18. Additional fill will be imported and located within the subject site. The additional fill will require retaining walls up to 3m in height. The location and indicative heights are only demonstrated on Engineering plan Co14452.00- C50. As a result, the artificial site level of up to 3m above natural ground level has not been considered within the visual impact assessment nor considered within the noise assessment. Further details including the inclusion of these walls on elevation plans, section plans and montages to demonstrate the visual impact of these retaining walls from within the subject site and from neighbouring sites is required.
19. There is no reference on the architectural plans regarding the solar panel's mountings (flush or angled mounting), as a result the visual impact of these panels cannot be assessed.

Landscaping

20. The proposed landscaping does not go far enough to reduce the size and scale of the proposed building, nor integrate with the design to provide a more cohesive landscaped setting. Clarification is required regarding the lack of landscaping along the north-western boundary.
21. Canopy trees are proposed to be sited within designated easement areas for multiple services. Confirmation that the landscaping within these easement areas satisfy the guidelines and technical requirements for planting over pipeline assets.