



10 September 2025

2200495

Ms Penny White
Planning Group
NSW Department of Planning, Housing and Infrastructure
Via email: penny.white@planning.nsw.gov.au

Attention: Ms Penny White

Dear Ms White,

**GAZCORP INDUSTRIAL ESTATE – 813-913 WALLGROVE ROAD, HORSLEY PARK
SSD-5248 – MODIFICATION 7 REQUEST FOR ADDITIONAL INFORMATION**

This letter is submitted to the Department of Planning, Housing and Infrastructure (DPHI) in response to a request for additional information dated 20 August 2025.

The request for additional information requested a response to issues raised in submissions made by the following agencies in relation to Modification 7 of the Gazcorp Industrial Estate:

- DPHI.
- Fairfield City Council.
- Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group.
- DCCEEW Conservation Programs, Heritage and Regulation (CPHR) Group.
- Fire and Rescue NSW.
- Rural Fire Service.
- Water NSW.
- Transport for NSW.

A summary of each of the issues raised by these submissions, as well as a detailed response is provided in the relevant section below.

1.0 Response to Submissions

The Applicant's response to the received submissions are outlined in **Table 1** below.

Table 1 *Response to Submissions Table*

Summary of Matters Raised	Response
Fairfield City Council	
The modifications to the concept development shall ensure compliance with the approved Urban Design Guidelines for the site prepared by Ethos Urban dated July 2024.	Noted. Compliance with the Urban Design Guidelines with the proposed modification is provided at Section 6.1 of the Modification 7 Report.
The application shall include a breakdown of the expected types of heavy vehicles accessing the site (e.g. 12.5m heavy rigid vehicles, 19m semi-trailers, 26m B-Double vehicles and 30m Quad Quad B-Double vehicles) on an hourly basis throughout the day. The applicant shall also demonstrate that there are sufficient loading bays within the site to accommodate the loading demands throughout the day. All vehicles await unloading and loading shall be parked within the site and not onto adjacent/nearby public roads. Service vehicles shall only carry out loading and unloading activities from the designated loading areas and shall not obstruct the flow of traffic within the site.	<p>The Transport Statement prepared and submitted at Appendix E of the Modification 7 Report confirms that the assessment remains unchanged from the traffic generation associated with the Estate and no additional pressure on the surrounding network is anticipated.</p> <p>Additionally, a Traffic Statement, Work Place Travel Plan and Operational Traffic Management Plan is prepared with each Development Application (DA) for each lot. The reports provided with the DAs confirm the expected vehicle types, the sufficiency of loading bays within the site and that all vehicles waiting to be unloaded will be within the site and do not queue on nearby or adjacent public roads or obstruct the flow of traffic within the site.</p> <p>Therefore, it is unnecessary to provide further traffic analysis at this stage as this information will be provided with future DAs.</p>
The Gazcorp Estate Road will remain as a private road. The applicant shall submit Council information on how signs and/or line markings installed or to be installed within the private road to be enforced, should any illegal parking activities or non-compliance issues were detected.	<p>Condition C37B requires that No Stopping signs are installed along the full length of the estate roads within the development. It is therefore unnecessary to provide a plan specifying the location of No Stopping restrictions.</p> <p>Additionally, the estate wide Operational Transport Management Plan includes procedures to deal with illegal parking.</p>
Prior to the issue of Construction Certificate, survey plans showing dimensions, grades and levels of the private Estate Road and its exact location shall be submitted for assessment and designed in accordance with the relevant Australian Standards, Austroads Guide and or TfNSW supplement to the Standard or Guide where applicable).	<p>It is highlighted that the internal estate roads are not public roads and not intended to be dedicated to council as public roads. It is therefore not considered necessary for council's assessment team to require detailed survey plans as specified.</p> <p>The roads have been designed in accordance with the relevant standards.</p>
Restricted access vehicles must not travel on local roads unless the applicant has obtained permits from National Heavy Vehicle Regulator (NHVR). Requests to use these vehicles on public road(s) must be submitted to the NHVR at least 28 days prior to the vehicles' scheduled travel dates.	Noted.
Prior to approval of the SSD, the applicant shall engage a suitably qualified person (Accredited Road Safety Auditor) to undertake a road safety audit for the latest design of the Estate Roads (MOD 7) to ensure that the road design and capacity is adequate to cater for the intended use and design vehicles. The objective of a road safety audit is to identify any foreseeable hazards for all road users and with the identified issues being addressed to the satisfaction of the Accredited Road Safety Auditor. Otherwise, the applicant shall provide a statement to why an RSA is not required.	A Road Safety Audit was completed as part of Modification 1. The proposed Modification 7 makes only minor refinements to the design of internal estate road 3 to make it shorter. Furthermore, there were no matters raised in the Road Safety Audit in relation to internal estate road 3, however, there was an assessment of internal estate road 2 which connects to internal estate road 3. The matters raised in relation to internal estate road 2 were associated with the general location and layout of internal driveway arrangements.

The crash risk associated with driveway layout was assessed as Medium – (with the severity of crashes assessed as ‘Minor’ and the frequency as ‘Occasional’), meaning crashes would be limited to a small number of low-speed vehicle collisions with minor injury or property damage only. Given the Medium risk rating, it was considered that the potential for crashes and associated traffic safety impacts could be managed through appropriate signage and line-marking as well as appropriate education measures, which will be addressed in the future detailed design stage and through operational traffic management plans and Driver Codes of Conduct. These findings would remain the same for the minor refinements to the design of internal estate road 2, which includes consolidating buildings so that there would be fewer driveways for buildings 1-6 and 9 (and no change for buildings 7A/7B and 8).

The Gazcorp Industrial Estate is a slow speed environment with no through traffic and only vehicles arriving/departing one of the buildings will be in the estate.

A Construction Traffic Management Plan (showing the various stages of construction, breakdown of vehicles expected to access the site, construction vehicle route to and from the site, TGS plans for various stages of development showing management of traffic and pedestrians) is required to be prepared prior to construction certificate for estate road and lots 1-9.

A Construction Traffic Management Plan (CTMP) has already been prepared and approved for the construction of the Estate Roads in accordance with Condition C31.

DCCEEW Water Group

NSW DCCEEW Water Group has reviewed the Modification Report and has no comments as the modification has no water related impacts.

Noted.

DCCEEW CPHR Group

CPHR has reviewed the Modification Application Report prepared by Ethos Urban (dated 3 July 2025) and accompanying technical reports. CPHR considers that the proposed modifications will not increase the impact on biodiversity values as the proposed footprint of the development is not proposed to change. CPHR also note that the proposed modifications are in flood free areas and are not impacted by the 1% annual exceedance probability (AEP) event and the probable maximum flood (PMF) event. No further consultation with CPHR is required regarding this application.

Noted.

Fire and Rescue NSW

FRNSW refers to our previous letter dated 26 September 2024, Advice on Amendment Report (D24/116203), for GAZCORP INDUSTRIAL ESTATE 813-913 WALLGROVE ROAD, HORSLEY PARK - (SSD-5248-Modification 6). All recommendations made in this letter remain applicable to this project. FRNSW submit no additional comments or recommendations for consideration, nor any requirements beyond that specified by applicable legislation at this stage.

Noted.

Rural Fire Service

Based on the information provided, it is recommended that the subsequent stage of the referral be supplied with a bush fire report prepared by a suitably qualified bush fire consultant addressing the relevant sections of Planning for Bush Fire Protection 2019.

Refer to assessment at **Section 1.1** below.
The proposed modification complies with the requirements of Planning for Bushfire Protection 2019, particularly in regard to public road access, internal road access, water, electricity and gas and landscaping.

Water NSW

WaterNSW has reviewed the exhibited documents and has no specific comments to make on this modification application.

Noted.

Transport for NSW

TfNSW has reviewed the submitted modification where the total Gross Floor Area (GFA), remains at 218,628m² and the traffic generation associated with the Estate is expected to remain unchanged from MOD 6. As such, TfNSW advises that the proposed changes will not have a detrimental impact to the surrounding classified road network and the agency has no further comment.

Noted.

1.1 Bushfire Assessment

A Bushfire Hazard Assessment has been prepared by BlackAsh and is provided with this RTS at **Attachment 1** to support the proposed modifications under this application.

The broader estate includes areas of bushfire prone land for the purposes of Section 10.3 of the *Environmental Planning and Assessment Act 1979* (EPA ACT) and on the Fairfield Bushfire Prone Land Map. As industrial development is considered “other” development by the Planning for Bush Fire Protection 2019 (PBP), there is considerable flexibility and the nature of the development results in the structures providing a higher degree of bushfire resistance than required by the NSW RFS.

Asset Protection Zones (APZs) are shown at **Figure 1** and the Bushfire Attack Levels (BAL) are shown at **Figure 2**.

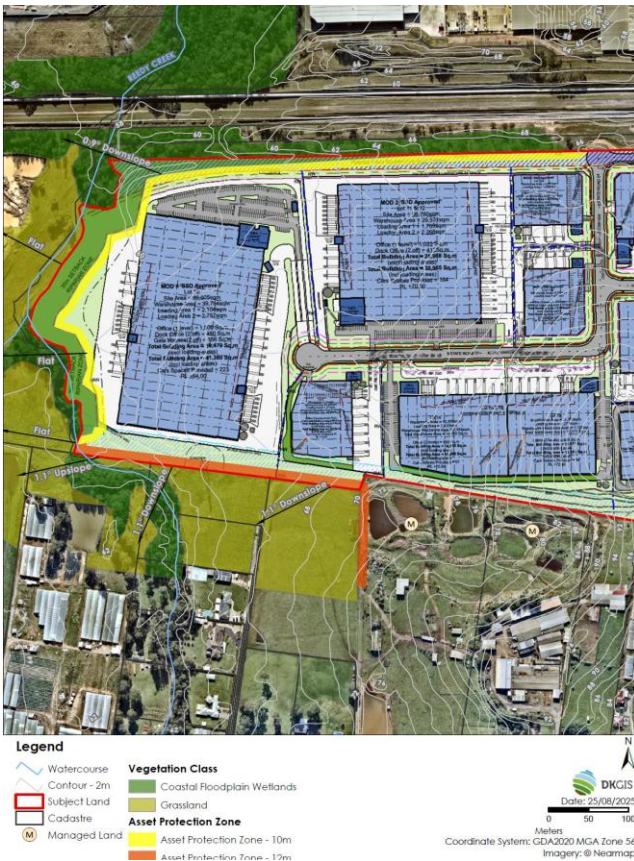


Figure 1 Asset Protection Zones

Source: BlackAsh

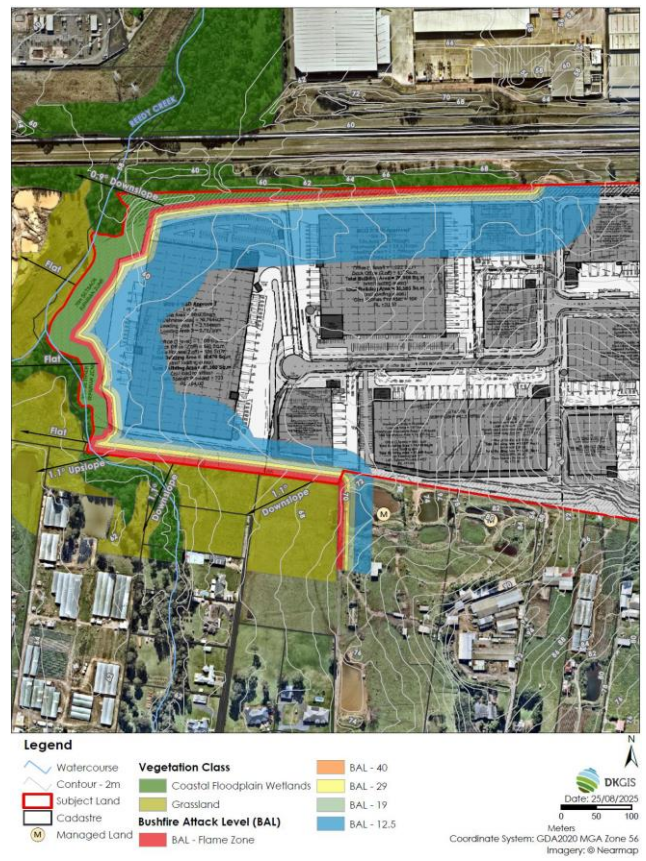


Figure 2 Bushfire Attack Levels

Source: BlackAsh

A reticulated water supply is available to the site and will remain unaffected by the proposed modification. The existing main along Wallgrove Road will be extended to provide reticulated water and fire hydrants within the site. This extension will also incorporate provisions for structural fire suppression, including onsite static water storage tanks to support firefighting operations.

The Gazcorp Industrial Estate has been designed to integrate with the broader road and the internal access roads will be constructed to provide heavy rigid and articulated vehicle access to each of the proposed buildings. The road network will provide suitable access for fire-fighting vehicles and appliances.

The proposed modification complies with the requirements of PBP 2019 particularly in regard to public road access, internal road access, water, electricity and gas and landscaping.

2.0 Conclusion

Please contact the undersigned for further information or clarification if required. Otherwise, we trust that the additional information provided is sufficient to enable the Department to continue its assessment of SSD 5248 – Modification 7.

Yours sincerely,

T. Ward

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