

01 September 2017

Mr Chris Ritchie  
Director, Industry Assessments  
Department of Planning & Environment  
GPO Box 39  
Sydney 2001

Dear Chris ,

## **SSDA 6799 MOD 1 - COLD STORAGE AND DISTRIBUTION FACILITY: RESPONSE TO SUBMISSIONS**

On May 18 2017 Urbis on behalf of Newcold submitted a Section 96 (2) Application to the New South Wales Department of Planning and Environment (DP&E) which sought to modify SSDA6799 to facilitate the use of the site by Newcold.

The application package was placed on public exhibition from 07 June 2017 until 07 July 2017. Following the close of the public exhibition period, the DPE requested that the proponent, Newcold, provide a formal response to the submissions received during the exhibition period. This letter provides a formal response to the matters raised in the submissions.

## **NOTIFICATION AND SUBMISSIONS**

The application was notified to adjoining landowners and key local and state authorities and agencies who were formally invited to make comment. In total four (4) government agencies being Blacktown City Council, Transport for NSW, Roads and Maritime Services and Transgrid provided submissions, no public submissions were received. The Department of Planning has also provided key issues to be addressed in the response to submissions in its letter dated 19 July 2017. A detailed response to the comments provided by the DP&E and within the various agency submissions are provided in **Table 1** on the following pages.

## **DESIGN MODIFICATIONS**

Having considered both the submissions received from Blacktown City Council and the DPE but also subsequent meetings held between all parties the following design modifications have been made to the proposal:

- Reduction in the building height of the low bay warehouse component to a compliant 6m;
- Reduction in overall building volume of 76,749 cubic metres;
- Alteration to the facade of the site notably the high bay warehouse portion of the development;
- Alteration of the office design to create further visual interest to Hollinsworth Road;
- Alteration of the "technical room" to create further visual interest to the Harris Avenue interface
- Increase in total site landscaping by 2,003sqm, resulting in a total of 9,045sqm
- Reduction in signage size and location on all frontages; and
- Increase in on site parking from 104 spaces to 133 spaces

The design modifications are detailed in full as part of the Architectural Plans attached as Appendix A of this letter.

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Table 1 – Response to Submissions

| Matters Raised                                                                                                                                                                                                                                                                                                                                     | Applicant consideration of matter/response                                                                                                                                                                                                                                                                                                                                                                                            |
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| <b>Department of Planning and Environment</b>                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <u>Building Measures and Plans</u>                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <p>It is noted the plans submitted with the modification application show a maximum ridgeline height of 36.5 m, however the report accompanying the application states the facility will have a height of 36 m. Please confirm the height of the proposal and provide revised architectural plans, if required.</p>                                | <p>As reflected in the submitted architectural plans the proposal will have a maximum building height of 36.5m.</p>                                                                                                                                                                                                                                                                                                                   |
| <p>The Modification Report states the proposed facility would have a Gross Floor Area (GFA) of 36,482 m<sup>2</sup>, however, the architectural plans submitted shows a building with a GFA of 37,682 m<sup>2</sup> . Please confirm the total building area of the proposed development and submit revised architectural plans, if required .</p> | <p>The proposed development will have a Gross Floor Area of 36,482sqm. This Gross Floor Area is comprised of the following:</p> <ul style="list-style-type: none"> <li>• High Bay Warehouse Area - 17,690sqm</li> <li>• Chiller Dispatch Area 3,714sqm</li> <li>• Freezer Dispatch Area 3,182sqm</li> <li>• Chiller Warehouse Area 4,256sqm</li> <li>• Freezer Warehouse Area 4,640sqm</li> <li>• Office Facility 3,000sqm</li> </ul> |



| Matters Raised                                                                                                                                                                                                                                                                                                                   | Applicant consideration of matter/response                                                                                                                                                                                                                                                                                                                                                                                                         |
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|                                                                                                                                                                                                                                                                                                                                  | <p>The two level tech room which has an area of 1,200sqm is considered to be a plant room and as such is not classified as Gross Floor Area under the definitions of State Environmental Planning Policy (Sydney Region Growth Centres) 2006</p> <p>It is noted that regardless of if the tech space is classified as Gross Floor Area or not the project will comply with the Floor Space Ratio prescribed to the site.</p>                       |
| <u>Noise</u>                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Please confirm whether the recommendations made in the noise assessment will be adopted for the proposed modifications to the development.                                                                                                                                                                                       | All recommendations made in the acoustic report will be implemented as part of the development if approved. It is recommended that the DPE appropriately condition the consent to ensure the recommendations are enacted.                                                                                                                                                                                                                          |
| <u>TransGrid</u>                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Please confirm if the modification seeks to increase the ground level from the approved development. If there is an increase plans of the modification in 30 DXF format will need to be provided to allow TransGrid to undertake its assessment of the clearances between the proposed development and TransGrid infrastructure. | The proposed modification will not increase the ground level of the proposed application.                                                                                                                                                                                                                                                                                                                                                          |
| <u>Hazards and Risk</u>                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| The original development approved under SSD 6799 included a refrigeration unit with up to seven tonnes of ammonia as a refrigerant. Please identify whether there are any changes in the preliminary design                                                                                                                      | <p>A detailed response has been provided by Blackie Mendham the projects risk consultant to all matters raised by the DPE in regards to Hazards and Risk. A copy of this response is provided as Appendix B of this report with each response also reproduced within this table.</p> <p>The proposed system will use between 3,500 – 5,500 kg of ammonia; however, the assessment within the PHA has been conducted based on 7,000 kg as noted</p> |

| Matters Raised                                                                                                                                                                                                                                                                                                                                                                                                                                     | Applicant consideration of matter/response                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| and the proposed safeguards for the refrigeration system under this modification.                                                                                                                                                                                                                                                                                                                                                                  | in Section 3.5 of the PHA in line with the previously approved quantity under SSD 6799.                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| A similar refrigeration system will usually need to be topped up occasionally to compensate for the loss of ammonia during the refrigeration process. This information is not included in the PHA. Please provide information on the dangerous goods transport to the facility, including transport frequency, package size, and top up inventory, if available.                                                                                   | <p>As it's a closed system topping up is not necessary, this will only occur during commissioning and in case a major leak happened. Topping up will be done by a professional refrigeration company with the proper safety equipment and exclusion zones in place.</p> <p>In summary, top ups are not expected other than during commissioning. In the event of a major leak, top up would be carried out under a change of management process as this is non-routine activity.</p>                                     |
| Please provide information on the storage mechanism of anhydrous ammonia and details of all equipment. This information must include tank/vessel size, pipe size, the size for the largest connection to the following equipment: tank, pump, heat exchanger, and compressor, condenser vessels. The Department considers 20 ml as the largest release from pump and compressors may be underestimating the potential impact from a toxic release. | <p>The requested level of detail is currently unknown in terms of sizing of equipment; however, the following is likely to be included in the design based on a similar setup constructed in Melbourne.</p> <ul style="list-style-type: none"> <li>• Evaporative condenser</li> <li>• Water relief tank</li> <li>• Liquid receiver</li> <li>• Air purger</li> <li>• High temperature accumulator</li> <li>• Economiser</li> <li>• Low temperature accumulator</li> <li>• High and low temperature compressors</li> </ul> |

| Matters Raised                                                                                                                                                                                                                                                                   | Applicant consideration of matter/response                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|                                                                                                                                                                                                                                                                                  | Likely failure modes for the pumps and compressors would be failure of compressor/pump seals which would only result in an area of release around the damaged portion of the seal as ammonia may escape around the dislodged/damaged seal. Therefore, an equivalent of 20 mm hole was assumed to allow for the releasing area around the seals which is considered appropriate.                                                                                                                               |
| What would be the worst-case release scenario from the refrigeration system? Releases from tank/vessel does not appear to have been discussed in the PHA, but is identified in Table A 1. Please clarify if releases from the storage tanks has been considered in the analysis. | <p>The largest release scenario would be based on a pipe rupture which was modelled as 50 mm based on a guillotine rupture of the pipework.</p> <p>While tanks have not specifically been discussed, failures relating to the tank are likely to occur at nozzles, flanges and pipework rather than the tank shell itself due to the robust design and testing of tanks.</p> <p>Subsequently, releases from tanks are presumed to have been accounted for in the modelling of the pipes, flanges, valves.</p> |
| Table A 1 describes sprinkler systems fitted in the compressor houses as safeguards. Is the sprinkler system automatically started on detection of ammonia release in the compressor house? Would there be any scenario leading to the contaminated water leaving the facility?  | Review of the design in consultation with the designers indicates the sprinkler system is not included in the design. Notwithstanding this, it is proposed to include a bund beneath the storage tank which is to be capable of containing the full volume of the storage tank.                                                                                                                                                                                                                               |
| Section 6.2.2 mentions gas detectors will be located throughout the facility and they will be connected to alarm systems and to isolation valves . Would the isolation valves close automatically upon detection of ammonia gas release?                                         | <p>It is proposed that upon detection of ammonia within the facility, the isolation valves would close to prevent the continued flow of ammonia through the system such that release through the unidentified release point is discontinued.</p> <p>The system can then be investigated to identify the point of release and have it corrected prior to de-isolation of the system.</p>                                                                                                                       |

| Matters Raised                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Applicant consideration of matter/response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| <p>In the event of ammonia release, the toxicity effect on human is explained in section 4.4. This section established that exposure of 100 ppm can cause immediate nose and throat irritation and exposure of 25 ppm should not cause adverse health effects nor cause undue discomfort to nearly all people. However, in section 7.2, it appears that 200 ppm is selected as the endpoint for risk of irritation and 500 ppm is selected as the endpoint for risk to injury without clear explanation on how these endpoints have been chosen. Referring to the Acute Exposure Guideline Levels (AEGL) for ammonia, it is noted that for 30 ppm and 220 ppm a 10 minute duration is adopted for AEGL-1 and AEGL-2, respectively. These AEGL values differ from the values adopted in the PHA. Please provide further information on the following:</p> <ul style="list-style-type: none"> <li>the rationale for choosing these endpoints for assessment. Depending on the release duration, selection of 500 ppm as serious injury may be underestimating the potential toxic effect; and</li> <li>what is the assumed release durations for ammonia?</li> </ul> | <p>Review of the AEGL values indicates these provides a much more conservative analysis and provide a greater assessment of more vulnerable populations. It is agreed that these values are more appropriate for assessment; hence, it is proposed to adopt these in the study in lieu of the existing reported values.</p> <p>However, adding these values into the model does not change the contours generated as the frequency of the initiating event is less than the permissible risk criteria.</p> <p>The scenarios that may have far reaching effects (i.e. medium and large releases) were estimated to have flow rates of approximately 9 and 56 kg/s respectively. Based on a 7,000 kg system, this would result in releases for full mass of the system occurring in approximately 780 s and 125 s respectively. To ensure sufficient conservatism in the dispersion, a release duration of 900 s was modelled which exceeds the realistic release durations.</p> |
| <p>The toxic dispersion distances are not provided. Please provide the dispersion distances to fatality, injury and irritation, with reference to surrounding land uses.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <p>The scenario that would results in the further downwind distances is a large release (50 mm) in F1.5 conditions. The following values have been taken for irritation, injury and fatality based on a 30 minute exposure using AEGL values:</p> <ul style="list-style-type: none"> <li>Irritation: 30 ppm</li> <li>Injury: 220 ppm</li> <li>Fatality: 1,600 ppm</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

| Matters Raised | Applicant consideration of matter/response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|                | <ul style="list-style-type: none"> <li>• The corresponding impact distances are:</li> <li>• Irritation: 2,890 m</li> <li>• Injury: 2,718 m</li> <li>• Fatality: 1,980</li> </ul> <p>A nearly 3 km impact distance has the potential for exposure to areas which could be residential, or contain sensitive receptors (i.e. childcare centres). However, it is noted the fatality risk as defined in the contours only partially impact over the site boundary; hence, these receptors would not be impacted by fatality risk exceeding the acceptable criteria of 0.5 pmpy.</p> <p>A review of the impact distances with reference to the acceptable risk criteria indicates injury does not occur (solely based on the initiating events) without considering wind stabilities nor direction to achieve the required impact. Therefore, the actual impact that may result in injury or irritation is substantially lower than the acceptable injury and irritation criteria.</p> |

## Blacktown City Council

### Height and lack of architectural merit

The building significantly exceeds the 16 m height limit that applies to the site. The external appearance and form of the building therefore requires careful detailing. Appropriate material selection is also required to ensure that the development contributes positively to its surrounding context and does not have an adverse impact on the intended scale and character of the area.

The proponent has worked extensively with both BCC and the DPE following the conclusion of the advertising period to provide a material selection commensurate with the expectations of all parties.

The design of the facility has subsequently sought to utilise a Kingspan Dri-design panel product. The finish creates a 3D effect and assists in distracting from the scale of the high bay warehouse without creating the further bulk that was shown in the previous design concepts.

The design of the low bay portion of the facility itself has been reduced in scale to allow for an improved design outcome and an overall reduction in the scale of the development.

The applicant has submitted a detailed analysis of the proposed building materials (PIR panels) outlining the benefits of the product in relation to the efficient operation of the facility. The proposed materials have been selected because of functional and operational considerations. Whilst this is understandable, the aesthetic impact of the materials in conjunction with the proposed bulk and scale of the development must also be taken into consideration

The proposed development will continue to utilise PIR panels however this will be overlayed in part by the Kingspan Dri-design panel. It is considered that this will facilitate an aesthetically appropriately built form whilst still considering the operational requirements of the building as a cold storage facility.

The office component of the development does not provide any additional visual interest on site. The office comprises standard curtain walling and metal cladding with no attempt made to exhibit any element of aesthetic interest.

The façade of the office portion of the building has been extensively revised in accordance with the comments received from BCC and is now considered to provide an appropriately articulated façade which provides an appropriate level of visual interest. Notably the façade of the office has been significantly augmented to include shading features and new materials to improve the overall look

It is considered that the controls and objectives of sections 6.4.2, 6.4.3 and 6.4.5 of the Marsden Park Industrial Precinct Development Control Plan (DCP) 2015 have not been satisfactorily addressed. For example, Clause 6.4.2 states that the built form and architecture of buildings located at street corners should enhance its location and positively respond to and emphasise the street corner. The applicant's submission (page 10 of the assessment table) responds to this requirement by stating that the "development site is not considered to be a corner site". The site, however, has 3 street frontages and is located in a prominent part of the estate on the corner of 2 sub-arterial roads. It is therefore considered essential that the design and appearance of the building enhance its significant location.

Further consideration has been given to the design of the façade throughout its entirety to ensure that suitable articulation and visual interest is proposed. The amended scheme is therefore considered to appropriately consider the requirements of the Marsden Park Industrial DCP and the overall comments from Council.

It is also noted that photomontages have been undertaken which demonstrate that the proposed development when viewed from key areas throughout Marsden Park including the future Town Centre, Richmond Road and the existing residential portions is suitable screened and/or treated.

This will be further amplified once the remainder of the Marsden Park Industrial Precinct is developed into the future as additional building bulk will be constructed between the site and the Marsden Park Town Centre.

It is considered that the proposal therefore minimises impacts on district views.

#### Landscaping

The proposal relies heavily on dense landscaping and significant tree planting to screen the building. The perimeter landscaping is also critical to enhancing the area. A significant portion of the landscaped area, however, is provided within the TransGrid easement. Given that TransGrid does not permit trees to be planted under the transmission lines, any landscaping provided in this area will need to be low and will not grow to a height that will help screen the building. As landscaping cannot be relied on to screen a significant portion of the building, it is

The proposal has been reviewed by TransGrid who have raised no objection to the proposals landscaping.

Regardless it is considered that the scheme as amended has provided for appropriate mitigation to the overall façade to not warrant additional landscaping within the TransGrid Easement.

We note that additional landscaping has been provided for throughout the estate itself where possible to further screen the development.

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| even more critical that the items listed under point 1 above are addressed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                           |
| Condition C50 requires the applicant to prepare a landscaping and vegetation management plan in consultation with Council staff, and to submit this plan to the Secretary for approval. We would expect to see significant large scale trees species and for the trees to be established/semi-mature in order for the landscaping to have an immediate impact. It is recognised, however, that tree planting cannot be provided within the car parking area, across the majority of the Darling Street frontage or under the transmission lines. Consideration should therefore be given to amending the plans to provide deep soil tree planting zones adjacent to the front facade (Darling Street facade) of the building. | <p>The comments raised by Council are noted and will be considered as part of the Vegetation Management Plan lodged prior to the issuance of the relevant Construction Certificate of the project.</p> <p>Deep Soil Planting areas have been provided on the Darling Street frontage of the site has been proposed where possible with a key focus being on the staff communal areas.</p> |
| The submitted planning report (page 8) proposes an amendment to condition C51. This reference should be C50. Items h., i. and j. within the existing condition should also remain.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | The requirement to maintain items h, I and j of Condition 50 is supported by Newcold.                                                                                                                                                                                                                                                                                                     |
| <u>Signage</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                           |
| The proposed signage, measuring 25 m x 6 m, is significantly larger and therefore should be positioned a maximum of 16 m above the natural ground level (NGL) in keeping with the maximum height control for the site. Signage on the eastern elevation is considered unwarranted, given that the adjacent building will screen any sign provided at a height of 16m.                                                                                                                                                                                                                                                                                                                                                         | The proposed signage has been significantly reduced in size and scale as a result of feedback received from Council.                                                                                                                                                                                                                                                                      |

| <u>External storage and screening</u>                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| We are concerned that the truck dispatch area, adjacent to the Hollinsworth Road frontage, could be used for external storage purposes when not being access by trucks. We do not support any external storage of goods within any of the setback areas, especially to Hollinsworth Road. All storage must be within the building or behind a suitably screened area. This issue should be addressed by way of a suitable condition. | No external storage is sought by the application. We recommend that a condition of consent be applied to ensure that external storage will not occur as part of the development.                                                                                                                                                                                                                                                                                                                    |
| The plans nominate that the fire tanks will be screened. Conditions should be included requiring that the applicant submit details of any screening for separate approval.                                                                                                                                                                                                                                                           | Details of the proposed screening has been provided on the Architectural Plans submitted as Appendix A. Further approval is not considered necessary.                                                                                                                                                                                                                                                                                                                                               |
| <u>Approved plans</u>                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| The application is seeking to update the list of approved plans. This includes deletion of the previously approved 'TransGrid easement plans'. This request should be referred to TransGrid for their considered and any deletion of the plans should only be with their concurrence.                                                                                                                                                | The application has been provided to TransGrid who have raised no objection to the proposal.                                                                                                                                                                                                                                                                                                                                                                                                        |
| <u>Parking</u>                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| The site layout results in travel (walking) distances of over 300 m from the car park, including the accessible parking spaces, to the building entry and offices. The car parking spaces are therefore considered inappropriately located. Furthermore, no details have been provided of the proposed covered pathway. The car parking area, including the accessible spaces, should be relocated adjacent to the building entry.   | <p>Relocation of the parking spaces adjacent to the office facility is considered inappropriate as it will result in significant conflict between heavy vehicle movement and cars. The design solution to separate the two elements is consistent with the DCP and greater policy within the industrial estates of Western Sydney.</p> <p>To facilitate safe access from the carpark to the office facility a dedicated pedestrian pathway has been proposed to ensure safe all weather access.</p> |

The proposed development requires a minimum of 311 car parking spaces. The approved development consent, however, only requires that 128 spaces be provided. This is a significant variation from the minimum parking requirement under the DCP. We object to a further reduction in the number of car parking spaces on site for the following reasons:

- i. The planning report indicates that there will be 65 staff working during the morning shift (i.e. till 1pm) and 55 staff working during the afternoon shift (i.e. from 1pm). This suggests that there will be 120 staff at the change over time. A further reduction in the number of car parking spaces (i.e. to 104 spaces) is therefore considered inadequate for the current staff numbers.
- ii. The current number of car parking spaces being proposed, is based on current anticipated staffing numbers. These may change in the future and Council will have no control over it. A further reduction in the amount of on-site parking will not cater for any future increase in staff numbers.

We consider that an area should be set aside for additional car parking to be provided in the future, so that parking provisions can comply with the minimum requirements of the DCP if the demand arises. At the very minimum, no further reductions should be given to the approved 128 car parking spaces. Any further departure from the minimum DCP parking requirement may have negative impacts on the surrounding developments in the future, and should not be supported.

A detailed traffic statement has been prepared for the application by The Transport Planning Partnership and is attached as Appendix C of this letter.

The proposed development has increased the total quantum of on site parking of the proposal to 133 spaces which exceeds the 128 spaces currently provided on the site. The revised quantity of car parking spaces not only exceeds that which was approved during the development consent but also addresses concerns staff vehicle numbers during the staff change over period.

The provision of a future area of the site for additional parking is considered inappropriate due to the specialist nature of the facility. It is considered unlikely that should Newcold vacate the premises that a dramatically different operator would be able to utilise the facility without significant alterations to the holistic design of the site.

| <u>Preliminary hazard analysis</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                              |
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| The Preliminary Hazard Analysis (report no. Q16-086 prepared by Blackie Mendham Pty Ltd and dated 13 April 2017) concludes that the risks at the site boundary are not considered to exceed the acceptable risk criteria. As such, the facility would only be classified as potentially hazardous and would be permitted within the current land zoning for the site.                                                                                                                                                                                                                                   | The comments of Blacktown City Council are noted and agreed.                                                                                                                                                                                                                                                                                                                                                 |
| <p>The recommendations provided in the Preliminary Hazard Analysis should be implemented and addressed as a condition of consent. Notwithstanding the conclusions in section 8.0 of the report, the following additional recommendations are made:</p> <ul style="list-style-type: none"> <li>i. Gas detectors and isolation valves are to be included within the facility design to isolate the ammonia systems in the event of ammonia detection.</li> <li>ii. Protection equipment (i.e. isolation valves, gas detectors) is to be inspected and tested a minimum of once every 6 months.</li> </ul> | The proposed gas detectors, isolation valves and associated maintenance can be installed as part of the detailed design plans prepared prior to the issuance of the relevant Construction Certificate.                                                                                                                                                                                                       |
| <b>Roads and Maritime Services</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                              |
| Roads and Maritime has reviewed the submitted documentation and request the following information for further assessment:                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <p>Updated architectural plans demonstrating a single vehicle entrance and exit for the truck access way have been provided as part of the Architectural Plans attached as Appendix A of this letter.</p> <p>Swept Paths displaying relevant turning circles have been provided within the traffic letter prepared by The Transport Planning Partnership which is attached as Appendix C of this letter.</p> |



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| <ul style="list-style-type: none"><li>i. Updated plans depicting a single vehicle entrance and exit for the truck access way. Roads and Maritime would not support two trucks entering or exiting the driveway simultaneously.</li><li>ii. Updated swept plans displaying the turn parts for both the entrance and exit to the site.</li></ul> |  |
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| Transport for NSW                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                           |
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| Discrepancy is noted regarding the increase of floor area (Urbis's report indicates an increase of 195 sqm whereas other parts of the supporting documents indicate an increase of 1,395 sqm);                                                                                                                                                                                                                                                                                                                                                                                                                | As previously noted in this letter the proposed development will have a Gross Floor Area of 36,482sqm.                                    |
| A Construction Traffic Management Plan (CTMP) shall be prepared by a qualified person and be submitted to the Principal Certifying Authority prior to the commencement of any works on site. The CTMP must be prepared in consultation with Blacktown City Council, Roads and Maritime Services and TfNSW. The CTMP should identify any traffic and transport impacts within the vicinity of the subject site resulting from the construction activities over the entire construction period. The assessment should include the cumulative construction impacts of all projects adjacent to the subject site. | Condition C8 of the existing development consent requires the preparation of a CTMP. The application does not seek to amend Condition C8. |
| TransGrid                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                           |
| TransGrid has no objections to the proposed modification, provided that the previously approved buffer around TransGrid's structure is maintained.                                                                                                                                                                                                                                                                                                                                                                                                                                                            | The comments received from TransGrid are noted, no further action is considered appropriate.                                              |

