

Letter



Date: Monday, 22 August 2022

The Trust Company (Australia) Limited

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

FAO: Stephen O'Connor

Project Name:	Proposed Modification to SSD9522 – Air Quality and GHG
Reference:	22.1019.FL2V1
Status:	FINAL

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.

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 'MD', followed by a horizontal line.

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 removal of buildings on Lots 1 and 4, along with changed overall areas of gross floor area (GFA) for buildings on Lot 2 and Lot 3 and slight amendments to the number of building docks for Lot 2.

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.

A tenant for the proposed Lot 2 of the Yards is proposed as Symbion, who pack, store, and distribute pharmaceutical goods. This letter is also 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 loading 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 m², 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 (NO₂) 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.

A subsequent modification was submitted (Northstar ref 22.1019.FL1V3, dated 25 February 2022), following confirmation of the tenant for Lot 2 and related to minor changes to the building areas and number of loading docks (MOD 3). Review of the proposed modification to SSD 9522 MOD 1 determined that the air quality and greenhouse gas impacts associated with Lots 1 to 4 would be anticipated to be materially the same as those previously assessed, reported and approved. No further assessment was considered to be required as part of MOD 3.

3. PROPOSED MODIFICATION

3.1. Lots 1 and 4

The current proposed modification for Lot 1 and Lot 4 is associated with the removal of the buildings on both of these lots. Removal of the buildings and subsequent loading docks significantly reduces the heavy vehicle trips as approved under SSD 9522 MOD 1.

3.2. Lot 2 and Lot 3

Lot 2 changes include the addition of two recessed loading docks to the building dock face. Minor changes to the warehouse floor area has resulted in a slight increase from that assessed under SSD 9522 MOD 1. There is no change to the proposed tenant for Lot 2 which will be occupied and operated by Symbion, a national wholesaler of healthcare services and products who proposes to use the warehouse and office facilities at Lot 2 to pack, store and distribute pharmaceutical goods. No manufacture of goods is proposed and emissions remain as per those resulting from vehicle deliveries, which have been approved under the SSD 9522 MOD 1.

Lot 3 changes are limited to the slight decrease in warehouse floor area from that assessed under SSD 9522 MOD 1.

A comparison of the Lot areas and building and loading docks, as proposed and as approved under SSD 9522 MOD 1 is presented in Table 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 ²	0 m ² (no building)	-24 810 m ²
	Loading docks	19	N/A	-19
2	Building area	23 685 m ²	27 814 m ²	+4 129 m ²
	Loading docks	16	19	+3
3	Building area	17 560 m ²	10 145 m ²	-7 415 m ²
	Loading docks	19	7	-12
4	Building area	14 140 m ²	0 m ² (no building)	-14 140 m ²
	Loading docks	19	-	-19
Total	Building area	80 195 m ²	37 959 m ²	-42 236 m ²
	Loading docks	73	26	-47

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. No further assessment is considered to be required to support the proposed modification.

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 lower than those previously assessed, reported and approved. The proposed modifications 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.