

27 February 2017

Mr Chris Ritchie
Director, Industry Assessments
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Ritchie

RE: Objection - Application no. MP 06_0089 MOD 2

I refer to the request lodged by Vopak Terminals Sydney Pty Ltd to modify an existing development application (MP 06_0089) for the proposed expansion to the existing bulk liquids storage facility (Site B) at 1-9 and 20 Friendship Road, Port Botany.

We act on behalf of the owners of the following properties: No's 110-116, 118 & 130 Denison Street legally described as Strata Plan 34222 and Lots 8-15 in Deposited Plan 21849.

Thank you for the opportunity to comment on the development application modification.

We have reviewed the relevant documentation submitted in relation to the application and wish to raise an objection on behalf of our clients. Our clients' main concern is the traffic impacts associated with the proposed expansion of the storage facility.

Traffic increase and congestion

We understand the applicant is seeking to modify the existing development consent to allow for an increased capacity at the facility (from 3,950 - 7,800 mega litres).

As stated in the Traffic Impact Assessment (TIA) submitted by the applicant, the expansion of the facility has the potential to result in an increased use of Denison Street by road tankers, from thirteen to twenty loads per hour. This represents a significant increase in the use of Denison Street (35%) by heavy vehicles associated with the bulk liquids facility.

It is noted that the TIA includes existing traffic counts on Denison Street however it does not include an assessment of overall traffic generation associated with the storage facility, recently approved developments and other future developments.

Denison Street already experiences traffic congestion contributed by its proximity to Port Botany and Westfield Shopping Centre, and will soon experience a significant increase in traffic and large vehicles as a result of the new Bunnings warehouse development (DA11/2240). The new Bunnings will be located at 140-148 Denison Street (adjacent to the existing busy athletics field) and will have parking capacity for approximately 420 vehicles.

In addition, there are numerous approvals for large residential developments in the surrounding area which will result in a further increase to traffic on Denison Street. Furthermore, there is potential for traffic to further increase as a result of future developments within Port Botany.

Cumulatively, the proposed increase in capacity of the subject storage facility in addition to existing and future uses will result in significant traffic impacts on Denison Street, with a consequent loss of amenity for business owners and residents on Denison Street.

It also has the potential to result in a traffic hazard, particularly at the junction of Denison Street and Wentworth Road where regular traffic congestion is already experienced. This increase of traffic also presents a safety risk, particularly at weekends when families with young children visit the athletics field.

Furthermore, this increase of traffic will preclude the establishment of future residential uses on Denison Street. The potential long term use of land along parts of the Denison Street corridor, particularly the eastern side for residential and/or mixed uses ought not to be prejudiced by any increase in heavy transport and in turn land use conflicts. We believe it would be a poor long term planning outcome to limit the option of a future wider range of uses along Denison Street.

A detailed assessment of cumulative traffic impacts has not been provided. The TIA states: *For future year traffic impacts, it is assumed that the background light and heavy vehicle traffic would increase due to various proposed developments in the area including the Bunnings, Qenos and Orica developments nearby as well as future developments within the Port Botany precinct to the south. Therefore, it is considered reasonable to assume that any increase in Vopak traffic would be commensurate with other heavy vehicle increases.*

The proposed increase of traffic to the existing bulk liquids storage facility, in conjunction with recently approved developments has the potential to result in an increased exposure to risks from dangerous goods transport incidents, a detrimental impact on the environment, safety and amenity of existing uses on Denison Street.

In order to protect the amenity of existing uses on Denison Street, the increased use of Denison Street by heavy vehicles should not be permitted and an alternative route implemented (as detailed below).

Transport Route

As noted in the TIA (page 4): *Foreshore Road provides the main route to Sydney's arterial road network at General Holmes Drive / Southern Cross Drive (part of the major M1 route serving Sydney).* The TIA refers to Beauchamp Road/Denison Street as providing a secondary route.

Denison Street contains a mix of uses; including residential, commercial, industrial and recreational uses. In contrast, Foreshore Road is a major freight road with no residential uses and is therefore better suited to large heavy vehicles.

We note that Condition 14 of the existing development approval (MP 06_0089) includes a restriction on the use of Stephen Road and Botany Road west as follows:

External Road Network - During the life of the project, the Proponent shall ensure that vehicles associated with the project do not transport hazardous goods along Stephen Road and Botany Road west of their intersection with Foreshore Road, unless for local deliveries only.

In order to protect the local amenity of the area and ensure a more environmentally responsible manner, our clients request the Department of Planning and Environment to apply a similar restriction on the use of Denison Street by heavy vehicles, which should be required to use Foreshore Road only. The use of Foreshore Road as a designated route for use by heavy vehicles associated with the subject storage facility would reduce traffic congestion on surrounding roads such as Denison Street.

Furthermore we refer the Department to the Greater Sydney Commission's Draft Central District Plan (page 75) which includes a proposal to upgrade the capacity of Foreshore Road as follows:

Foreshore Road Capacity Upgrade - Adding a dedicated freight only heavy vehicle lane to Foreshore Road could optimise Port landside movements and help improve the NSW economy. Foreshore Road is the primary route of entry and egress for heavy vehicles visiting stevedore terminals, container depots, fuel terminals and other freight generators in the Port Botany precinct.

This again supports our suggestion that Foreshore Road should be the designated single route for heavy vehicles associated with this storage facility.

As a minimum the applicant should be required to incorporate management practices to prevent both construction and operational traffic from using Denison Street, and direct them to use Foreshore Road.

Conclusion

With the above in mind, our clients request that if the Department of Planning and Environment approves an increase in the capacity of the bulk liquids storage facility, then it should include a condition that heavy vehicles use Foreshore Road as their main transport route and the use of Denison Street should not be permitted.

We thank you for the opportunity to make comment on the subject Modification Application and look forward to your response. We respectfully request the Department of Planning and Environment to consider the above comments.

Should you have any queries or require any additional information regarding this matter please do not hesitate to contact me on 0400 413 701.

Yours sincerely,



Mark Grayson
Director
Knight Frank Town Planning (NSW)