

Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Sent by email: nathan.stringer@planning.nsw.gov.au

Re: Moorebank Intermodal Precinct West – Concept Plan and Stage 1 (SSD-5066-Mod-2), and Stage 2 (SSD-7709-Mod-1)

Dear Mr Stringer,

Liverpool City Council (LCC) has received a request to comment on two separate modification applications relating to the Moorebank Intermodal West Precinct (MPW). The applicant SIMTA (as Qube Holdings Limited) has submitted this modification request to facilitate the construction of two Woolworths distribution and logistics centres within MPW.

The proposed modification comprises the following components:

- **MPW Concept Plan and Stage 1 (SSD 5066 MOD 2)** – Adjust the southern operational boundary of the MPW Stage 2 warehouse area and amend the maximum building height established across warehouse areas 5 and 6 from approximately 21m up to and including 45m; and
- **MPW Stage 2 (SSD 7709 MOD 1)** – Adjust the southern operational boundary of the MPW Stage 2 warehouse area and amend the maximum building height established across warehouse areas 5 and 6 from approximately 21m up to and including 45m. Amendments are also sought to increase operational noise criteria and to allow for the storage of Dangerous Goods on-site at warehouse areas 5 and 6.

Council supports Woolworths establishing a warehouse and distribution centre in Liverpool, including the creation of jobs in Liverpool. To that end, Council does not object to this application, however, has concerns primarily relating to visual impacts of the proposed development.

Traffic

Council has previously objected to the Moorebank terminals development on the grounds of traffic and transport impacts on the road network in the Liverpool Local Government Area. Council has consistently requested that improvement works should be carried out to minimise these impacts. Council seeks clarification regarding the traffic impacts that will arise as part of the proposed modification. It is not clear to Council what traffic implications will arise as a result of the proposed modification, or if traffic arrangements will remain unchanged under the existing consents for MPW.

Council encourages the inclusion of a pedestrian bridge from Casula train station to the MPW site. This would provide active transport options for future workers at the site, reduce vehicle congestion and assist with improved overall travel and traffic outcomes.

Furthermore, it will provide an 'active link' for the community to access the valuable bushland that surrounds the intermodal sites and surrounding area.

Dangerous Goods

Council has received numerous complaints and concerns from the community regarding the component of the modification proposal that involves the storage of dangerous goods. It is understood by Council that the dangerous goods to be stored are in relation to the quantity of supermarket items such as aerosol cans and other flammable items that will be stored by Woolworths. Council submits that the conditions surrounding the safe storage of dangerous goods must be in a manner that will safeguard the community.

Noise

Council considers that site regulation in regard to noise management may be assisted by adopting a precinct approach consistent with the NSW EPA's Noise Policy for Industry (2017). Despite some similarities, the criteria recommended by Renzo Tonin & Associates (*Moorebank Intermodal Terminal Precinct Operational Noise Management (Issued Revision 4) dated 30th June 2020*) may be less stringent than presented under the Concept Plan in certain circumstances. Whilst it is acknowledged that current criteria in the Approval may be impracticable, it will be necessary for the Department to consider applying suitable noise limits that are achievable and capable of protecting the amenity and wellbeing of sensitive receivers.

The Department is requested to consider acoustic impacts associated with proposed amendments to the Concept Plan comprising the extension of operational boundaries at the site. Noise impacts attributed to the two distribution centres must also be examined. It will be necessary for the Department to determine whether the previously submitted acoustic reports incorporate an effective assessment of the proposal comprising all modifications. If it is determined that sufficient information is unavailable, the Modification Applications shall be supported by an acoustic report prepared by a suitably qualified acoustic consultant.

When assessing noise levels at commercial or industrial premises, the noise level shall be determined at the most affected point on or within the property boundary. Alternatively, when gauging noise levels at residences, the noise level shall be assessed at the most affected point on or within the residential property boundary. It is noted that Council has received offers from residents in Casula to allow the testing of noise levels within their properties. These residents possess concerns that noise monitoring occurring currently are not at a high enough elevation and that more significant acoustic impacts will occur to properties at higher elevations within Casula.

Proposed Height

As stated within the *Clause 4.6 Variation – Height of Buildings (Clause 4.3)* prepared by Willowtree Planning, "the proposed modifications would result in an exceedance of the 21 m building height control under LLEP2008 by approximately 24 m (or by 114.29%)." Council has concerns regarding the visual impacts of the development, summarised below:

- The visual impacts of the proposed warehouses seem significant from certain vantage points in Casula including the loss of scenic views; and

- Mitigation measures cannot be provided that would enable the scenic views of properties in Casula to be retained.

Council's concerns are outlined further in Table 1 below.

Table 1 - Council Concerns Regarding Height

Pg.	Justification	Response
40	<p><i>The proposed modifications to the concept layout and maximum building height would continue to remain consistent and compatible with surrounding industrial land uses (eastern and northern boundaries), including warehouses and industrial facilities, as well as the adjoining Moorebank Precinct East (MPE) Intermodal Facility within the wider Moorebank Logistics Park, that are designated for such employment-generating land uses of similar and parallel nature. Accordingly, the Site would not adversely impact the identified residential typologies, located to the west (adjoining George River) and far east (adjoining and screened by MPE) of the Subject Site, which are zoned R2 Low Density Residential. Therefore, the Site (including the proposed modifications) would not exhibit any adverse environmental or amenity impacts (refer to Section 6.2 below).</i></p>	<p>While the proposed warehouses are consistent and compatible with the surrounding industrial land uses, the proposed height is more than twice the height of the surrounding warehousing.</p> <p>Significant scenic views from Casula (a topographical high point in comparison to the land to the east and south) will be impacted.</p>
40	<p><i>facilitate a positive visual outcome for the wider Intermodal Facility and the wider sensitive visual receivers throughout Casula towards the west of the Site beyond Georges River</i></p>	<p>There are likely to be adverse visual impacts of the proposal, particularly from sites in Casula.</p>
41	<p><i>Soft landscaping around the perimeter of the Subject Site and in the building separation zones, will soften the appearance of future built form and contribute to an attractive streetscape along the Western Ring Road, characterised by native vegetation planting and green verges. Provisions for future vegetation planting should include a dichotomous array of both native and endemic trees, plants, shrubs and grass species, which provide a natural buffer between the</i></p>	<p>The loss of scenic views from sites in Casula is of concern. Nonetheless, extensive landscaping is strongly encouraged for this proposed modification. Increased tree canopy across the site is essential to mitigate against urban heat impacts, and provide a screening effect for the proposed warehousing.</p> <p>Council submits that all proposed tree removals be calculated as a percentage of canopy lost and be</p>

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	<i>Site and surrounding allotments to define the separate warehouses and ensure views to and from the Site take in high quality landscaping.</i>	offset with new vegetation as measured from the day of construction completion.
42	<i>The heights proposed are considered consistent with market trends and operational requirements within the NSW Industrial (including freight and logistics) Sector, whilst being consistent and transitional with industrial development adjoining the Subject Site and within close proximity to the Subject Site, throughout Moorebank, as well as industrial-development further west located within the Prestons Industrial Employment Precinct which comprise heights of similar nature and stature.</i>	Council recognises the efficiency advantages of high-bay warehousing and encourages this form of development, however is concerned with the visual impacts of the development, particularly from sites in Casula.
42	<i>The Visual Assessment Report prepared by Roberts Day (2020) based the potential visual impact on visual receptors that were perceived to potentially have the highest sensitivity towards the Subject Site, with regard to the future built form potential of two (2) Warehouse and Distribution Facilities (subject to a concurrent Modification Application under SSD 7709 MOD 1).</i>	<p>The visual receptors chosen involve perspectives that are often shielded by development or trees. For example, the perspectives taken from Casula Road is setback from Canberra Ave which offers views between dwellings across the river. It is requested that an additional visual receptor is provided, as well as the following new perspectives:</p> <ul style="list-style-type: none"> • Casula Powerhouse and Arts Centre; and • Casula Parklands. <p>Both of these sites are of significant local and regional value to the community and are tourism destinations. The loss of scenic value as experienced from these sites has not been considered as part of the proposed modifications.</p>
45	<i>The combination experienced with respect to both market and tenant demand has significantly increased due to the lack of industrial land release and exponential land value increases, for which requires end users to reach new attainable development standards, via means of verticality to secure an ideal planning</i>	Council notes the significant demand currently for industrial land and is eager for employment generating uses to be fostered within the LGA. It is also noted that vertical warehousing helps maximise the efficiency of industrial land. However, such development should be appropriate

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	<i>outcome. Accordingly, the proposal is considered to be of an appropriate scale and character, having regard to the desired outcome for the locality, for which the Subject Site is centralised within the MPW site, whereby the future built form of the wider MPW site would provide for a softer and improved transitional development, whilst not posing any adverse visual impacts on nearby sensitive visual receivers.</i>	and adverse impacts, including visual impacts avoided or mitigated.
45	<i>It also sets a new industrial standard of amenity for workers and visitors, as well as potentially impacted residential receivers, which is considered well in advance of the current nature of industrial development practices and standards.</i>	Council supports the innovative use of industrial land, however such development should be appropriate and adverse impacts, including visual impacts avoided or mitigated.
48	<i>Additionally, existing views of residential dwellings around Carroll Park will be visually impacted by future developments accruing heights of the maximum 21 m able to be attained in accordance with the LLEP2008 Development Standard. The analysis undertaken by Roberts Day indicates that the proposed High Bay components will constitute only a minor additional built form component, with respect to the future industrial character and built form of the wider Moorebank Intermodal Precinct.</i>	The existing visual impact is noted, however Council does not agree with the statement that the proposed modification will only constitute a minor additional built form component. The proposed height is more than twice the existing height limit.

Should you require additional information on this matter, please contact Luke Oste, Executive Planner on 8711 7886 or ostel@liverpool.nsw.gov.au.

Yours sincerely



David Smith
A/Director City Economy & Growth