

Section 4.55(2) – SSD 7709 (MOD 1) – Response to Public Submissions

Proposed Moorebank Intermodal Precinct West – Stage 2

Moorebank Avenue, Moorebank (Lot 1 DP 1197707)

Table 1: Matrix of Public Submissions – SSD 7709 MOD 1			
Frequency No.	Issues Identified	Number of Times Raised	Comment
1.	Visual Impact <ul style="list-style-type: none">Impact on residential areas including scenic views and skyline within Casula.Incorrectly quoted at 52 m – noted to be 45 m.Increased height concerns.'Dominate the skyline'.	35	The Visual Impact Assessment reports prepared by Roberts Day (2020) have assessed the potential overall cumulative visual impacts of the JR and JN warehouse as 'moderate / low' in Year 1 and 'low' in Year 10+. It is noted that the Proposal will be largely screened by proposed landscaping along the western boundary when viewed from residential receivers to the west in Casula (Year 10+) which is satisfactorily demonstrated within the Landscape Plans for the Site, as well as the Visual Impact Assessment (refer to Appendix 5 & 6).
2.	Noise <ul style="list-style-type: none">Construction and operational noise concerns.Noise impacts on residents in Casula.Adjustment to operational noise limits and concerns associated with sleep disturbance and 24-hour operation.Concerns pertaining to additional noise pollution.	28	Further design refinements pertaining to the Proposal have been undertaken, which has resulted in no such change in the predicted noise levels for the nearest potentially affected receivers in Casula. The Noise and Vibration Impact Assessment (NVIA) prepared by Renzo Tonin has been revised with respect to the updated noise predictions based on the revised design (refer to Appendix 7). Additional predicted noise levels for Glenfield Farm and for the residential receivers in Glenfield have been added to address the respective submission comments, all of which achieve a satisfactory standard with respect to the relevant noise emission criteria for the Proposal and across the Site.
3.	Dangerous Goods <ul style="list-style-type: none">Concern for health & safety and well-being of the community and surrounding land uses.Concern pertaining to the storage of Dangerous Goods on-site.	24	In accordance with the peer review of the PHA prepared by RiskCon Engineering (2020), they note that the analysis undertaken demonstrates that minor incidents relating to retail goods would not result in offsite impacts. Accordingly, based on the analysis conducted, RiskCon conclude that the risks at the Site boundary are not considered to exceed the acceptable risk criteria; hence, the proposed Warehouse and Distribution Facilities would only be classified as potentially hazardous and would be permitted within the IN1 General Industrial zone for the Site (refer to Appendix 8).
4.	Miscellaneous:	15	The adjoining issues were identified as 'miscellaneous' and are all considered to have been appropriately addressed throughout the Submissions.

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	<ul style="list-style-type: none">▪ 'Offensive and should not be allowed'▪ Health and safety concerns.▪ Pollution.▪ 'Hard to make a submission on mobile.'▪ Property value declined due to intermodal.▪ Market needs valued more than impacts on residents.▪ Concerns of unreasonable exhibition timeframe.▪ Systemic concerns on intermodal pollution.		<p>Concerns around health and safety have been addressed in the Dangerous Goods Peer Review (refer to Appendix 8), as well as within the overall Construction and Operational Environmental Management Plans required for the Site under SSD 7709.</p> <p>Additionally, the socio-economic assessment prepared by HillPDA (refer to Appendix 9) includes a positive affirmation as a result of the proposed modifications, including the positive impacts on nearby residential communities.</p> <p>Furthermore, the Air Quality Impact Assessment previously prepared by Northstar at the time of lodgement of the Modification Applications is considered to appropriately address air quality with respect to pollution, for which there would be no adverse impacts as a result of the proposed modifications with respect to pollution.</p>
5.	<p>Suitability:</p> <ul style="list-style-type: none">▪ 'Be better planning to have this project in a much more industrialised area.'▪ Concerns of substantially the same development.▪ Non-compliance with height development standard.	7	<p>The intention of the proposed modifications is to construct and operate two (2) Warehouse and Distribution Facilities, which would serve to provide the future end user with a modernised State-of-the-Art automated facility, for warehousing and distribution of palletised goods across Australia. After several scenarios of development were investigated, the proposed modifications were deemed to be the most suitable for the Subject Site for the following reasons:</p> <ul style="list-style-type: none">▪ LLEP2008 permits the proposed modifications, for the purposes of two (2) Warehouse and Distribution Facilities with Development Consent in accordance with Section 4.55(2) of the EP&A Act.▪ Access to the regional road network is provided, namely the M4 and M7 Motorways.▪ Compatibility with surrounding development and local context is achieved.▪ The Site represents orderly and sequential development having regard to the proximity to the adjoining Moorebank Intermodal Precinct East (MPE), comprising the remainder of the Moorebank Logistics Park.▪ Minimal impact on the environment would result.

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			<ul style="list-style-type: none">Implementation of suitable mitigation measures where required can be achieved. <p>The Subject Site is commensurate with the objectives of the proposed modifications as it allows industry-based activities, whilst minimising the impact on the surrounding environment. The Site layout proposed demonstrates a strong connection to maintain consistency with the objectives of the IN1 General Industrial zone and adjoining E3 Environmental Management zone set out within LLEP2008 and enhances the underlying employment character intended for the immediate and wider localities. Accordingly, the resultant built form reinforces the nature of the employment-generating land use within the Liverpool LGA and the wider industrial-zoned land within Western Sydney, whilst remaining sensitive to the broader surrounding environment.</p>
6.	Biodiversity: <ul style="list-style-type: none">Impacts on flora and fauna.Earthworks and stormwater and drainage impacts on biodiversity.	6	The proposed modifications would not result in additional biodiversity impacts at the Site, which have been previously assessed under SSD 7709. Further consideration is not considered to required in relation to this item.
7.	Traffic: <ul style="list-style-type: none">Increase in traffic will result in additional risk, r.e. safety, accidents and noise.Concern pertaining to access to roads being impacted by the proposal.Traffic congestion.	6	<p>As confirmed in the <i>Transport Assessment</i> prepared by Ason Group (2020), the traffic analysis undertaken indicates that during the standard AM and PM peak hours, the combined facility generates significantly less traffic (light and heavy) than corresponding approved thresholds, demonstrating that whilst the proposal may generate relatively more heavy vehicle traffic across the day compared with the developments assumed under the assessment with respect to SSD 7709, for which the proposal's traffic occurs outside of the critical morning and evening peak hour periods.</p> <p>Accordingly, the traffic analysis undertaken by Ason Group (2020) demonstrates that the Modification Application would generate traffic volumes that are below the approved traffic generation thresholds that have been previously established and approved under SSD 7709. Therefore, the road network – subject to the infrastructure upgrades approved with respect to SSD 7709 – would operate at a satisfactory Level of Service (LoS).</p>

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8.	<p>Jobs:</p> <ul style="list-style-type: none">▪ 'As the result of the Woolworths project will result in the net loss of 1,600 jobs.▪ Concerns of employment.	3	<p>In the <i>Moorebank Intermodal Precinct West - Socio-Economic Impacts</i> report, HillPDA (2020) note that the Proposal will add employment directly and indirectly to the area, significantly improving local access to employment (on-site and in the surrounding community), as well as improving the overall livelihood as a result of the Proposal (refer to Appendix 9). Specifically, the Proposal will generate the following employment opportunities:</p> <ul style="list-style-type: none">▪ 1,271 jobs are expected to be created during the construction phase; and▪ 1,200 jobs are expected to be created during the operational phase. <p>Additionally, the Proposal will positively contribute to meeting the additional demand for employment within the locality from the rapidly growing population in the area which will result in the following positive social and economic impacts:</p> <ul style="list-style-type: none">▪ The Proposal will create direct and indirect employment in the south west region of the Sydney Metropolitan Area.▪ The Proposal will provide additional services and amenity to local residents.
9.	<p>Lights:</p> <ul style="list-style-type: none">▪ Lighting impacts on residents.	2	<p>The lighting design has been designed in accordance with the Conditions of Consent pertaining to SSD 7709, as well as the relevant Australian Standards to ensure a compliant lighting design can be achieved.</p>
10.	<p>Open Space:</p> <ul style="list-style-type: none">▪ 'Intermodal has taken away a fair chunk of green land that our suburb had'.	1	<p>Historically, the Site was owned and operated at a Commonwealth level, for which there was no such dedicated 'open space' prior to the Site being rezoned for industrial-related development. Ample landscaping provisions have been allocated for the proposed modifications which balances the built form proposed.</p>
11.	<p>Bushfire:</p> <ul style="list-style-type: none">▪ Concerns for increase bushfire risk and fire safety.	1	<p>All future built form proposed would be located outside vegetated and bushfire prone areas. Accordingly, the potential bushfire threat to the fixed assets (built form components) during construction is considered to be low. Additionally, the operational phase of the proposed modifications would be considered to be consistent with the objectives of Planning for Bushfire Protection 2019 (PBP), in that it provides the following:</p>

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			<ul style="list-style-type: none">▪ Separation distances between fixed assets and bushfire prone vegetation exceed the required defendable space widths;▪ Safe operational access and egress for emergency services personnel and residents are available;▪ Ongoing management and maintenance measures for bushfire protection; and▪ Utility services that meet the needs of firefighters.
12.	Heritage: <ul style="list-style-type: none">▪ Impacts on Glenfield Farm.	1	In a letter of support prepared by Artefact (2020), the proposed modifications are considered with respect to both Aboriginal Cultural Heritage and Non-Aboriginal Heritage. Accordingly, there would be no such impacts on Glenfield Farm as a result of the proposed modifications.
13.	Community Consultation: <ul style="list-style-type: none">▪ 'More public consultation and meetings are required.'	1	Noted. This is in relation to ongoing consultation required by the Applicant.
14.	Flooding: <ul style="list-style-type: none">▪ Concerns of development on the floodplain.	1	The engineering design for this project has been completed and coordinated in the MPW Precinct wide Stormwater Management Strategy and Water Sensitive Urban Design (WSUD) requirements as detailed within the Stormwater Design Development Report (SDDR) previously prepared in accordance with Conditions of Consent, B4-B6 and B28 under SSD 7709. Any revisions required to the post-approval documentation under SSD 7709 in relation to soils and water can be undertaken as a post-approval requirement, subject to Development Consent being granted under this Modification Application.
15.	Earthworks: <ul style="list-style-type: none">▪ Impacts of earthworks on surrounding area.	1	There are no earthworks proposed under this Modification Application. All earthworks have been approved under SSD 7709, for which only minor regrading would be required as a result of the subject Modification Application.