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Karen Harragon  
NSW Department of Planning, Industry & Environment  
4 Parramatta Square  
12 Darcy Street  
Parramatta NSW 2150

**RE: SECTION 4.55(2) MODIFICATION TO SSD 5066 – PROPOSED CONCEPT PROPOSAL AND EARLY WORKS FOR INTERMODAL FACILITY**

**PROPERTY AT: MOOREBANK AVENUE, MOOREBANK (LOT 1 DP 1197707)**

Dear Karen,

Reference is made in relation to the subject State Significant Development (SSD) Application – **SSD 5066** – that was approved by the Minister for Planning on 3 June 2016 for a Concept Proposal for the use of the Site as an Intermodal Facility; and Early Works (Stage 1) across the Subject Site – Moorebank Avenue, Moorebank (Lot 1 DP 1197707).

Following a review of the NSW Department of Planning, Industry and Environment's (DPIE's) request for the Response to Submissions (RTS), dated 7 September 2020, the matters raised have been taken into consideration and are accurately addressed in the response matrix that is attached this letter. Clause 82 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation), permits the Planning Secretary of the NSW DPIE to request the Applicant to provide a written response in relation to the issues raised within the submissions following public exhibition. This RTS aims to fulfil the request from the Director-General.

Additionally, as a result of the RTS, the Submissions have been considered and revisions to the Concept Plan and Masterplan for the potential future built form have been made which have resulted in an improved design that addresses the following key concerns:

- **Concept Plan:** The Concept Plan has been revised to consider future built form of the Site in accordance with design revisions made to facilitate built form proposed under SSD 7709 MOD 1.
- **Visual Impacts:** 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**).

Furthermore, review of the Public Submissions for both **SSD 5066 MOD 2** and **SSD 7709 MOD 1** have been collated and assorted into key issues depending on the frequency of the issue raised. It is noted that the Public Submissions were almost identical with respect to both Modification Applications, for which one consolidated matrix has been prepared and utilised for the purposes of this Response to Submissions (refer to **Appendix 11**).

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It is considered, that this information now provides the NSW DPIE with all the necessary facts and relevant particulars related to the proposed modifications subject to this Modification Application (**SSD 5066 MOD 2**); thereby, enabling the assessment to be finalised and the Proposal determined.

We look forward to the NSW DPIE's feedback on the information provided and look forward to progressing with the assessment of this Modification Application.

Should you wish to discuss further, please contact the undersigned.

Yours Faithfully,



Chris Wilson  
Managing Director  
Willowtree Planning Pty Ltd  
ACN 146 035 707

**Enclosed:**

- **Appendix 1 – Revised Moorebank Precinct West Concept Plan**
- **Appendix 2 – Visual Impact Assessment JN**
- **Appendix 3 – Visual Impact Assessment JR**
- **Appendix 4 – Socio-Economic Assessment**
- **Appendix 5 – Response to Public Submissions**

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**Table 1: Response Matrix**

| Relevant Entities Response to Submissions                                                                                                                                                                                                                                                                                                                                                                                                                        | Formalised Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| <b>NSW Department of Planning, Industry and Environment (Karen Harragon – Director – Social and Infrastructure Assessments)</b>                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Building Height and Visual Impact</b>                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <p><i>The proposed increase in building heights for warehouses 5 and 6 is a key concern raised during the exhibition of the modifications, which the Department requests you address. Additional information required to address these concerns should include, but not be limited to:</i></p> <ul style="list-style-type: none"> <li><i>Further justification of the proposed 45 m heights and subsequent non-compliance with the Liverpool LEP;</i></li> </ul> | <p>In response to the submission raised by the NSW DPIE, the height of the highbay component proposed (SSD 7709 MOD 1) for future built form in relation to the JR warehouse has been reduced (from 42.6 m to 39.4 m) to a more appropriate level consistent with the surrounding industrial character articulated within the Moorebank Logistics Park (MPE &amp; MPW), as well as other surrounding industrial developments to the north of the Site.</p> <p>Whilst a Clause 4.6 Variation request is not formally required as part of a Modification Application, Willowtree Planning prepared the <i>Clause 4.6 Variation – Height of Buildings (Clause 4.3)</i> document, which includes significant justification with respect to the proposed 45 m height limit with respect to the future built form pertaining to Warehouses 5 (JR – 39.4 m) and 6 (JN – 43.25 m).</p> <p>As mentioned within the Clause 4.6 Variation, if the proposed modifications were to support the built form proposed with regard to a compliant scheme in accordance with the Development Standard of LLEP2008, the built form potential of the Site would be significantly under-realised. Hypothetically, if a height compliant scheme for a future proposal was submitted, it would:</p> <ul style="list-style-type: none"> <li>Not contribute towards meeting the demand for employment-generating opportunities within the Liverpool Local Government Area (LGA), as identified within <i>A Metropolis of Three Cities</i> and the <i>Western City District Plan</i>, by potentially resulting in a reduction in available building footprint and consequently prohibiting future industrial-related land uses on the Site, that supports the growth of the Moorebank Logistics Park, specifically MPW,</li> </ul> |

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zoned IN1 General Industrial;

- Threaten the commercial viability of the Subject Site for future built form, by reducing the overall achievable maximum height across the Site, which would impact on end user operational requirements on a land portion zoned for such industrial-related development;
- Not be able to achieve a height, that is being driven due to securing economic employment lands for a secured end user (Woolworths);
- Create fewer full-time equivalent jobs during the construction and operational (including maintenance) phases of development due to a decrease in footprint and potential disinterest in the Site due to preferred end user ceiling heights not being able to be achieved in an emerging industrial market demand gearing towards new and increased warehousing height thresholds that allow for increased operational capabilities; and
- Fail to meet the Objects of the Environmental Planning and Assessment Act 1979 (EP&A Act) by making orderly and economic use of the Site for its full planning potential.

Additionally, consistency and added justification with respect to the objectives pertaining to both the IN1 General Industrial zone and Clause 4.3 of the LLEP2008 were provided within the Clause 4.6 Variation, which are considered satisfactory and significantly justify the height non-compliance proposed under this Modification Application.

Accordingly, the overall scale of the proposed modifications sought are to provide a transition for existing and future built form anticipated for Moorebank Precinct West (MPW), from existing industrial developments along the eastern (Moorebank Precinct East (MPE)) and northern interfaces, comprising developments of similar industrial nature, which are considered compatible in terms of built form and scale and reflects the intended industrial characteristics envisaged for the Site. Additionally, the topography of the Subject Site is considered ideal for future development, for which SSD 7709 has previously responded to, by establishing the building pads suitable for any future built form proposed, as well as being suitably located away from nearby

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sensitive receivers to the west of the Site, primarily identified in Casula – which experience a significant increase in gradient away from the Site emphasising the distance experienced between the Site when viewed from ground level (eye-level view).

The design philosophy for the built form proposed under this Modification Application strives to integrate all elements of function and space, to achieve an efficient and comfortable working environment, capable of adapting to the future requirements of the end user (Woolworths) involved. The overall site layout addresses both the functionality of future warehousing and logistics operations and the high quality presentation to the wider Moorebank Logistics Park for future built form proposed, whilst being cognisant of amenity pertaining to surrounding receivers. It is noted, that future high bay components would be located on the eastern (JR) and south eastern (JN) sides of (Warehouses 5 & 6), maximising the setbacks able to be achieved from the Western Ring Road and further maximising the floor space able to be achieved across the remainder of the Site. Additional emphasis is placed on the siting of the high bay components which have been strategically located to the rear of the Site to allow for a reduced visual impact on potentially impacted visual receptors identified to the west of the Site. This is particularly evident within the photomontages for the Site located within the revised Visual Impact Assessment (refer to **Appendix 2 & 3**).

The height and scale adjustments explored under this Modification Application (including revisions made as a product of the Response to Submissions phase of the Proposal) are considered to be uniform and representative of the facilities within the wider Moorebank Logistics Park (both MPE & MPW), as well as other industrial-related development to the north of the Subject Site. 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

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|  | <p>Precinct which comprise heights of similar nature and stature.</p> <p>Increased heights allow for flexibility for future end users and high volumes of storage; thereby, improving the operational efficiencies able to be achieved on-site. Furthermore, highbay warehousing within the logistics industry is increasing in popularity due to the cost efficiencies it provides. In a continually evolving and growing environment like Sydney (particularly the Western Sydney Region), where land values are at a significant premium to other states, it becomes an essential part of the business case to continue operations in NSW. Additionally, Woolworths would like to continue their presence within NSW and remain significant employees to the wider community, for which the Subject Site will enable them to retain and develop key staff and grown employment within the Liverpool LGA.</p> <p>The height and scale for future built form is further articulated within the photomontages found within the Visual Impact Assessment prepared by Roberts Day (2020). The revised Visual Impact Assessment is located within <b>Appendix 2 &amp; 3</b> of this Submission.</p> <p>As mentioned in the Clause 4.6 Variation and as a result of the built form proposed, the Subject Site would be visually treated and suitably screened by both existing and proposed extensive landscaping along the western boundary traversing the Georges River tributary, along with dispersed landscape planting proposed on the Subject Site, throughout the designated landscape setbacks and throughout the proposed car parking and hardstand areas, which further ameliorates the potential impacts with respect to the Urban Heat Island Effect. This landscaping strategy is considered consistent with the approved landscaping strategy outlined within the Urban Design Development Report (UDDR) recently approved by the NSW DPIE, designed to suitably and visually treat development proposed within MPW.</p> <p>The revised Visual Impact Assessment prepared by Roberts Day (2020) assesses the overall visual impact of the JR warehouse as low. It is noted that the Proposal (both JR and JN) will be largely screened by the proposed landscaping along the western</p> |
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boundary when viewed from Casula (year 10+) which is satisfactorily demonstrated within the landscape strategy for the Site within the revised Concept Plan (refer to **Appendix 1**).

Additionally, although the highbay component proposed in JN warehouse is above the surrounding context, it doesn't impose any adverse visual impacts on the surrounding visual receivers (including residential receivers to the west of the Site) due to:

- Consistency with the industrial character of the area, representing an orderly and sequential development.
- Presence of other landscape detractors higher than the 21m height limit (including utility poles and railhead gantry cranes).
- Generous buffer between the highbay components and surrounding publicly accessible areas / private residential views (in average the views are ~1 km away from the highbay component, which reduces the perception of height and scale).
- Due to extensive distance and topography of the Site in accordance with residential receivers to the west (including viewpoints 4, 11, 12 and 13), the overall visual impacts are significantly mitigated by being in line and below the skyline, for which existing 'scenic' and 'skyline' views on these receptors are not compromised.
- Existing dense vegetation (including regional park and creek corridor) plus proposed landscaping which further screens the Proposal.

The proposed maximum building height for built form proposed across selected portions of the Site (Warehouses 5 & 6) is considered consistent with the future end user (Woolworths) requirements for modernised industrial warehousing, encapsulating a highly cost beneficial and operationally efficient outcome. The combination experienced concerning both market and tenant demand has significantly increased due to the lack of industrial land release and exponential growth with regard to land value, which requires end users to reach new attainable

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|                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p>development standards, via means of verticality to secure a supportable and appropriate planning and development outcomes. 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.</p> <p>The urban design approach for the Site has evolved in a considerate relationship to adjoining low density residential typologies adjoining Georges River to the west, as well as low density residential typologies adjoining Moorebank Precinct East toward the east of the Subject Site (Moorebank Precinct West). This is to ensure that these receiver's current and future amenity would not be compromised by any future built form across the Site.</p> |
| <ul style="list-style-type: none"><li>▪ <i>Additional evidence to demonstrate that current approved warehouses height of up to 21 m would not be commercially viable (i.e. that the proposed height increase is required to ensure that the site is viable for future commercial operation);</i></li></ul>                                                                                                                      | <p>This Submission item is in relation to SSD 7709 MOD 1.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <ul style="list-style-type: none"><li>▪ <i>Address concerns that many of the perspectives included within the visual impact analysis that form part of the Mod are often shielded by development or trees, and provide additional perspectives from the Casula Powerhouse and Arts Centre, the Casula Parklands, and an additional visual receptor from Casula Road/Canberra Avenue, as requested by Council; and</i></li></ul> | <p>Additional viewpoints have been prepared and assessed in the revised Visual Impact Assessment reports prepared by Roberts Day (refer to <b>Appendix 2 &amp; 3</b>), including:</p> <ul style="list-style-type: none"><li>▪ Casula Arts Centre;</li><li>▪ Casula Parklands; and</li><li>▪ Casula Road / Canberra Avenue.</li></ul> <p>As a result of the additional perspectives identified, it is apparent that the built form proposed under the subject Modification Application (SSD 7709 MOD 1) would be generally screened by existing landscaping in the surrounding locality, for which adds significant emphasis to the small minority of actual potential impacts that this Proposal would have on the surrounding residential environment.</p>                                                                                                                                                                                                                                                             |
| <ul style="list-style-type: none"><li>▪ <i>Address concerns regarding a lack of visual impact analysis undertaken from private properties at Casula including consideration of each of the visual impact perspectives provided as part of the original application.</i></li></ul>                                                                                                                                               | <p>Additional viewpoints have been prepared and assessed in the revised Visual Impact Assessment reports prepared by Roberts Day (2020), which demonstrate the potential visual impacts on the surrounding private properties (refer to <b>Appendix 2 &amp; 3</b>). The photographs have been taken from driveways and along the properties' boundaries / back fencing to represent the private views typically experienced in</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |



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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>these locations.</p> <p>As a result of the investigative studies undertaken, the revised VIA confirms that the existing dense vegetation will screen the Proposal in the majority of private views. The potential visual impacts experienced throughout residential properties along Carroll Park are mitigated by proposed landscaping along the western boundary of the Subject Site. In addition, most potentially visually impacted views are wide and panoramic, for which the Proposal is perceived as a relatively minor additional element within the overall scene and visual environment, for which 'scenic' and 'skyline' views are not compromised.</p> |
| <b>Noise</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <p><i>Significant concerns have been raised regarding the proposed amendments to the operational noise criteria stipulated in Table 4 of condition B131 of SSD-7709. The Department requires you to address these concerns, including but not limited to:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Impacts of increased noise levels on nearby residential amenity, including increased disturbance;</i></li> </ul>                                           | <p>This item is in relation to <b>SSD 7709 MOD 1</b>, for which addresses all comments pertaining to noise emissions across the MPW site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <ul style="list-style-type: none"> <li>▪ <i>Concerns that noise survey readings have not been undertaken at the most affected point on or within relevant property boundaries, and may not have taken into consideration the elevated nature of some private dwellings in Casula, which sit above street level. Council has advised that they have received offers from residents in Casula to allow the testing of noise levels within their properties;</i></li> </ul> | <p>As above.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <ul style="list-style-type: none"> <li>▪ <i>Demonstrate that where all loggers have been placed is "truly representative of the most affected residence" (Noise Policy for Industry); and</i></li> </ul>                                                                                                                                                                                                                                                                 | <p>As above.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <ul style="list-style-type: none"> <li>▪ <i>Concerns regarding the impact of increased operational noise on Glenfield Farm, which is listed on the NSW State Heritage Register.</i></li> </ul>                                                                                                                                                                                                                                                                           | <p>As above.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Dangerous Goods</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <p><i>The Department's Hazards team has raised a number of concerns with regard to the Preliminary Hazard Analysis submitted as part of the Stage 2 Modification 1 application (SSD-7099-Mod-1). To address these, you are required to provide:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Clear plans/diagrams indicating:</i></li> </ul>                                                                                                                      | <p>This item is in relation to <b>SSD 7709 MOD 1</b>, for which addresses all comments pertaining to Dangerous Goods across the MPW site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

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| <p><i>a. the location of the subject warehouses in context of the other warehouses within SSD-7709 and other land uses around SSD-7709;</i></p> <p><i>b. the location of all dangerous goods and hazardous chemicals storages (class and maximum quantities) within the site plans of the subject warehouses and verify that this storage arrangement would be able to comply with the relevant Australian Standards; and</i></p> <p><i>c. consequence areas and risk contours based on plans/diagrams a and b above;</i></p> |                                                                                                                                                                                                                                                                                                                                                        |
| <ul style="list-style-type: none"> <li>▪ <i>An analysis for full warehouse fire for the subject warehouses, including analysis of toxic combustion products from this fire, in view of the range of dangerous goods classes to be stored within the warehouses; and</i></li> </ul>                                                                                                                                                                                                                                            | As above.                                                                                                                                                                                                                                                                                                                                              |
| <ul style="list-style-type: none"> <li>▪ <i>Revise the probabilistic risk analysis in the PHA to be consistent with the Department's HIPAP No. 4 frequency-based land uses safety risk criteria, and assess the cumulative risk from both subject warehouses to surrounding land uses against HIPAP No. 4.</i></li> </ul>                                                                                                                                                                                                     | As above.                                                                                                                                                                                                                                                                                                                                              |
| <b>Traffic</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                        |
| <p><i>The Department notes Liverpool City Council's concerns that the traffic impacts that will arise as part of the proposed modifications are unclear, and requests that you address these concerns including through the provision of further information regarding the traffic implications of the proposal (in particular the increased building height and associated warehouse volume), as well as clarifying and detailing whether traffic arrangements would remain unchanged under the existing consents.</i></p>   | Noted.                                                                                                                                                                                                                                                                                                                                                 |
| <b>Infrastructure and Services</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                        |
| <p><i>The Department notes concerns raised by Endeavour Energy that the Modification Reports submitted do not appear to address the potential impact of the requested modifications on the electricity infrastructure, as well as the suitability of the site for the development in regard to whether the availability of electricity services are adequate for the proposed development.</i></p>                                                                                                                            | The Proponent note that the HV network design will require approval from Endeavour Energy prior to connection. Provision will be made to supply future Warehouses 5 and 6 ( <b>SSD 7709 MOD 1</b> ) from Anzac Village Zone Substation at 11 kV which will accommodate the electricity demand for future Warehouses 5 and 6 ( <b>SSD 7709 MOD 1</b> ). |
| <p><i>The Response to Submissions should address whether nor not the increased heights of warehouses 5 and 6 (and resulting higher volumes/density) may result in an increase in the peak demand at Anzac Village Zone Substation, and changes to the local network to accommodate higher loads.</i></p>                                                                                                                                                                                                                      | The increased height of the building is not a direct correlation with an increase in electricity demand for future Warehouses 5 and 6 ( <b>SSD 7709 MOD 1</b> ). It is noted, that the HV network design will require approval from Endeavour Energy prior to connection for future Warehouses 5 and 6 ( <b>SSD 7709 MOD 1</b> ).                      |
| <p><i>The Department requests that you address Endeavour Energy's request that</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                        | This item is in relation to <b>SSD 7709 MOD 1</b> , for which addresses all comments                                                                                                                                                                                                                                                                   |

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| <i>the preliminary hazard assessment provided under the provisions of SEPP 33 addresses the risks associated with the proximity of the electricity infrastructure.</i>                                                                                     | pertaining to Dangerous Goods across the MPW site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Social and Economic Impacts</b>                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <i>Please address the concerns raised by members of the public with regard to the impact that the proposed automated high bay warehousing may have on the overall employment benefits of the MPW site as was used to justify the original application.</i> | <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 <b>Appendix 4</b>). Specifically, the Proposal will generate the following employment opportunities:</p> <ul style="list-style-type: none"><li>▪ 1,271 jobs are expected to be created during the construction phase; and</li><li>▪ 1,200 jobs are expected to be created during the operational phase.</li></ul> <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"><li>▪ The Proposal will create direct and indirect employment in the south west region of the Sydney Metropolitan Area.</li></ul> <p>The Proposal will provide additional services and amenity to local residents.</p> |
| <i>Provide updated operational employment numbers.</i>                                                                                                                                                                                                     | <p>In the <i>Moorebank Intermodal Precinct West - Socio-Economic Impacts</i> report prepared by HillPDA (2020) it is identified (and as mentioned above) that as a result of the proposed modifications, the Proposal will generate approximately 2,471 jobs, which includes:</p> <ul style="list-style-type: none"><li>▪ 1,271 jobs are expected to be created during the construction phase; and</li><li>▪ 1,200 jobs are expected to be created during the operational phase.</li></ul> <p>The Socio-Economic Assessment prepared by HillPDA is located within <b>Appendix 4</b> of this Submission.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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**Table 2: Response Matrix**

| Relevant Entities Response to Submissions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Formalised Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| <b>Liverpool City Council (David Smith – A/Director City Economy &amp; Growth)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Traffic</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <p><i>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.</i></p> | <p>This item is in relation to <b>SSD 7709 MOD 1</b>, for which addresses all comments pertaining to traffic across the MPW site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <p><i>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.</i></p> <p><i>Furthermore, it will provide an 'active link' for the community to access the valuable bushland that surrounds the intermodal sites and surrounding area.</i></p>                                                                                                                                                                | <p>The Submission identifies no direct contextual relationship to the subject Modification Application.</p> <p>For context, the MPW Development Consent under SSD 5066 comprises a Concept Approval as well as approval for MPW Stage 1 Early Works. Under Schedule 2 (Terms of Approval) of that consent instrument, condition of consent 18 states:</p> <p style="text-align: center;"><i>The layout of the site shall not prevent a possible future pedestrian connection to Casula Railway Station.</i></p> <p>Under the MPW Stage 2 Consent (SSD 7709) Part B Key Environmental Issues, Condition B2(j) requires provision of a corridor for this purpose. This corridor is identified in the approved B2 Development Layout Drawings Reference: PIWW-RCG-AR-DWG-0100(H).</p> <p>Further consideration is not considered to be required in this respect.</p> |
| <b>Dangerous Goods</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <p><i>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</i></p>                                                                                                                                                                                                                                                                                                                                                                                              | <p>Noted and agreed. This can be undertaken as a Condition of Consent subject to approval.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

**Section 4.55(2) – SSD 5066 (MOD 2)**

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| <i>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.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Noise</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <i>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 &amp; 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.</i> | Noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <i>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.</i>                                                                                                 | <p>The subject Modification Application has included an acoustic assessment which reviewed in detail the noise emissions from the current proposal and reviewed the current proposed design, which includes feasible and reasonable mitigation measures to account for any projected noise emissions as a result of the Proposal.</p> <p>The ONM document (TJ741-11F05 (r4) Moorebank Noise Management Precinct - Requirements review) included a review of the appropriate criteria that would apply to the cumulative noise emissions from both the MPW and MPE operations. As noted in the response from the NSW EPA, the cumulative noise criteria recommended are in line with current policy and seen as reasonable by the NSW EPA. Operational noise emissions from the existing and future MPW and MPE operations would then be designed and managed in accordance with achieving these overall cumulative operational noise levels.</p> |
| <i>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</i>                                                                                                                                                                                               | <p>In accordance with the NPfI, when assessing or verifying noise impacts from a development, they are to be "... assessed at the reasonably most-affected point on or within the residential property boundary or, if that is more than 30 metres from the residence, at the reasonable most-affected point within 30 metres of the residence, but not closer than 3 metres to a reflective surface and at a height of between 1.2-1.5 metres above ground level" (NPfI Section 2.6).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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*are not at a high enough elevation and that more significant acoustic impacts will occur to properties at higher elevations within Casula.*

The noise modelling for the proposed modifications has included 3D terrain, taking into account the elevated location of the Casula residences. Noise levels were assessed in accordance with the NPfI at these potentially noise affected residences, and these are the noise levels that have been included in the assessment undertaken as part of this Modification Application.

Verification of noise impacts will also be undertaken in accordance with Section 7 "Monitoring performance" of the NPfI during facility operations. However, it is important to note that the criteria apply to noise emissions from Moorebank Intermodal Terminal activities, and not from general ambient noise. In some cases for receivers within Casula, direct measurement of noise from MIP for the purposes of verification is not possible because of the high existing traffic noise levels from nearby arterial roads, and so verification measurements are required to be undertaken by alternative approaches included in the NPfI.

### 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*

In accordance with the subject Modification Application, the following is noted regarding potential visual impacts pertaining to both warehouses in isolation, as well as from a cumulative perspective:

- JR Warehouse: The reduced height (from 42.6 m to 39.4 m) in the revised design and proposed landscaping lead to a moderate / low visual impact on the vantage points in Casula. Notwithstanding, the overall visual impact of the JR Warehouse is considered to be low since the Proposal is not visible in majority of studied vantage points.
- JN Warehouse: The majority of views in Casula will not be impacted by the proposal due to the existing dense vegetation, land topography (low points along the creek) and distance from proposal. The VIA investigative studies identified Carroll Park as the only main publicly accessible area being potentially visually impacted by the Proposal. However, it is argued that the landscape quality and character of existing scenic views is changing due to the evolving industrial precinct (as well as surrounding industrial developments beyond the Subject Site) and the proposal does not cause an abrupt change or a notable loss to the quality of landscape.

Cumulative Impacts: The Visual Impact Assessment report assessed the overall cumulative visual impact of the JR and JN warehouse as moderate / low in year 1

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|                                                                                                                                                                                                                                                                                                                                                          | <p>and low in year 10+. It is noted that the Proposal will be largely screened by the proposed landscaping along western boundary when viewed from Casula (year 10+) which is satisfactorily demonstrated within the Landscape Plans for the Site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <ul style="list-style-type: none"><li>▪ <i>Mitigation measures cannot be provided that would enable the scenic views of properties in Casula to be retained.</i></li></ul>                                                                                                                                                                               | <p>It is important to note, that the Proposal is completely consistent with both the IN1 General Industrial zone objectives, as well as the Clause 4.3 objectives under the LLEP2008. As confirmed within the Visual Impact Assessments prepared by Roberts Day (2020), the Proposal does not create any adverse visual impacts and would not compromise scenic views or the skyline of sensitive residential receivers.</p> <p>Importantly, in terms of mitigation measures, the materiality of the building's proposed will be expressed in volumetric shapes broken up by a colour palette representing earthy tones to provide a conducive visual appearance. The architectural design is considered sophisticated and representative of modernised highbay warehouses, whilst being completely cognisant with respect to nearby sensitive receivers affording views towards the Site, for which the design has evolved to mitigate unwarranted views where possible and protect the visual amenity of identified receiver locations as best as possible.</p> <p>Additionally, proposed landscaping along the western boundary (mature size) with a height of 30 m will largely screen the JR Warehouse due to its revised reduced height (from 42.6 m to 39.4 m) as demonstrated within the revised Architectural Plans (refer to <b>Appendix 2 &amp; 3</b>). Furthermore, with respect to the JN Warehouse, proposed landscaping along the western boundary (mature size) will partly cover the Proposal to an extent that only a small part of the highbay component will be visible.</p> |
| <p><i>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.</i></p> <p><i>Significant scenic views from Casula (a topographical high point in comparison to the land to the east and south) will be impacted.</i></p> | <p>As mentioned above, in accordance with the subject Modification Application, the following is noted regarding potential visual impacts pertaining to both warehouses in isolation, as well as from a cumulative perspective:</p> <ul style="list-style-type: none"><li>▪ JR Warehouse: The reduced height (from 42.6 m to 39.4 m) in the revised design and proposed landscaping lead to a moderate / low visual impact on the vantage points in Casula. Notwithstanding, the overall visual impact of the JR Warehouse is considered to be low since the Proposal is not visible in majority of studied vantage points.</li><li>▪ JN Warehouse: The majority of views in Casula will not be impacted by the proposal due to the existing dense vegetation, land topography (low points along the creek) and distance from proposal. The VIA investigative studies</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <p>identified Carroll Park as the only main publicly accessible area being potentially visually impacted by the Proposal. However, it is argued that the landscape quality and character of existing scenic views is changing due to the evolving industrial precinct (as well as surrounding industrial developments beyond the Subject Site) and the proposal does not cause an abrupt change or a notable loss to the quality of landscape.</p> <ul style="list-style-type: none"><li>▪ Cumulative Impacts: The Visual Impact Assessment report assessed the overall cumulative visual impact 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 the proposed landscaping along western boundary when viewed from Casula (year 10+) which is satisfactorily demonstrated within the Landscape Plans for the Site.</li></ul> |
| <p><i>There are likely to be adverse visual impacts of the proposal, particularly from sites in Casula.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                | <p>The majority of residential properties will not be impacted by the Proposal due to:</p> <ul style="list-style-type: none"><li>▪ Existing landscaping comprising mature trees / dense vegetation which satisfactorily screens views towards the Subject Site; and</li><li>▪ Orientation of properties (not facing the Subject Site).</li></ul> <p>Additionally, properties along Carroll Park (open land with limited tree cover) are identified as main private views impacted by the Proposal. Notwithstanding, it is argued that:</p> <ul style="list-style-type: none"><li>▪ Backyards are facing the Proposal with 2 m back fencing which partly blocks the view from ground level; and</li><li>▪ Upper storeys are more elevated than the studied views (Viewpoints 4, 11, 12 &amp; 13) which results in a higher eyelevel and lower skyline. This will reduce the proposed height impact.</li></ul>      |
| <p><i>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.</i></p> <p><i>Council submits that all proposed tree removals be calculated as a percentage of canopy lost and be offset with new vegetation as measured from the day of construction completion.</i></p> | <p>The landscaping strategy proposed across the Site is considered comprehensive and integrates an aesthetically pleasing architectural landscaped design that is sympathetic towards visual receptors to the west of the Site, by improving the visual amenity by increasing available canopy cover across the Site. Additionally, the proposed landscaping strategy is consistent with the Urban Design Development Report (UDDR) which has been recently approved and aims to facilitate a 15% site coverage with respect to landscaping across MPW, for which the proposed modifications are completely consistent with. Accordingly, the landscaping proposed is considered sufficient and consistent with the landscaping strategy required for</p>                                                                                                                                                         |



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| <p><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.</i></p>                                                                                                                                                                                                                                                                                                                                               | <p>MPW.</p> <p>As previously mentioned above, in accordance with the subject Modification Application, the following is noted regarding potential visual impacts pertaining to both warehouses in isolation, as well as from a cumulative perspective:</p> <ul style="list-style-type: none"><li>▪ JR Warehouse: The reduced height (from 42.6 m to 39.4 m) in the revised design and proposed landscaping lead to a moderate / low visual impact on the vantage points in Casula. Notwithstanding, the overall visual impact of the JR Warehouse is considered to be low since the Proposal is not visible in majority of studied vantage points.</li><li>▪ JN Warehouse: The majority of views in Casula will not be impacted by the proposal due to the existing dense vegetation, land topography (low points along the creek) and distance from proposal. The VIA investigative studies identified Carroll Park as the only main publicly accessible area being potentially visually impacted by the Proposal. However, it is argued that the landscape quality and character of existing scenic views is changing due to the evolving industrial precinct (as well as surrounding industrial developments beyond the Subject Site) and the proposal does not cause an abrupt change or a notable loss to the quality of landscape.</li><li>▪ Cumulative Impacts: The Visual Impact Assessment report assessed the overall cumulative visual impact 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 the proposed landscaping along western boundary when viewed from Casula (year 10+) which is satisfactorily demonstrated within the Landscape Plans for the Site.</li></ul> |
| <p><i>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:</i></p> <ul style="list-style-type: none"><li>▪ Casula Powerhouse and Arts Centre; and</li><li>▪ Casula Parklands.</li></ul> <p><i>Both of these sites are of significant local and regional value to the</i></p> | <p>Both viewpoints identified by Council have been investigated within the revised Visual Impact Assessment report (refer to <b>Appendix 2 &amp; 3</b>). Accordingly, the Proposal will have no adverse visual impacts on the existing views of these two (2) sites, for which further consideration is not considered to be required in this respect.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

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| <p><i>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.</i></p>                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <p><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 and adverse impacts, including visual impacts avoided or mitigated.</i></p> | <p>In response to the concerns raised by the NSW DPIE, the height of the highbay component proposed in the JR Warehouse has been reduced (from 42.6 m to 39.4 m) to a level which is consistent with the surrounding industrial character articulated within the Moorebank Intermodal Facility (MPE &amp; MPW), as well as surrounding industrial developments to the north of the Site.</p> <p>The Visual Impact Assessment report assesses the overall visual impact of the JR Warehouse as low. It is noted that the Proposal will be largely screened by the proposed landscaping along western boundary when viewed from Casula (year 10+) which is satisfactorily demonstrated within the Landscape Plans for the Site (refer to <b>Appendix 2 &amp; 3</b>).</p> <p>Although the highbay component proposed in the JN Warehouse is above the maximum building height limit, it doesn't impose any adverse visual impacts on surrounding visual receivers (including residential receivers to the west of the Site) due to:</p> <ul style="list-style-type: none"><li>▪ Consistency with the industrial character of the area.</li><li>▪ Presence of other landscape detractors higher than the 21 m height limit (including utility poles and railhead gantry cranes).</li><li>▪ Generous buffer between the highbay component and surrounding publicly accessible areas / private residential views (in average the views are ~1 km away from the highbay component which reduces the perception of height and scale).</li><li>▪ Due to the extensive distance and topography of the Site in accordance with residential receivers to the west (including Viewpoints 4, 11, 12 and 13), the overall visual impacts are significantly mitigated by being in line and below the skyline, for which existing 'scenic' and 'skyline' views on these receptors are not compromised.</li></ul> |

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|                                                                                                                                                                                                                                                              | Existing dense vegetation (including Carroll Park, Casula Parklands and the Georges River creek corridor) and proposed landscaping which further screens the Proposal.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <i>Council supports the innovative use of industrial land, however such development should be appropriate and adverse impacts, including visual impacts avoided or mitigated.</i>                                                                            | As above.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <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.</i> | <p>In response to the concerns raised by the NSW DPIE, the height of the highbay component proposed in the JR Warehouse has been reduced (from 42.6 m to 39.4 m) to a level consistent with the surrounding industrial character articulated within the Moorebank Intermodal Facility (MPE &amp; MPW), as well as surrounding industrial developments to the north of the Site.</p> <p>The Visual Impact Assessment report assesses the overall visual impact of the JR Warehouse as low. It is noted that the Proposal will be largely screened by the proposed landscaping along western boundary when viewed from Casula (year 10+) which is satisfactorily demonstrated within the Landscape Plans for the Site (refer to <b>Appendix 2 &amp; 3</b>).</p> <p>The proposed highbay component in the JN Warehouse is not considered to be a major additional built form component. This is mainly due to the fact that the most impacted views are wide and panoramic with the proposed modifications perceived as a relatively minor additional element within the overall scene.</p> <p>The Visual Impact Assessment report assesses the overall cumulative visual impact of the JR and JN Warehouses as moderate/ low in year 1 and low in year 10+. It is noted that the Proposal will be largely screened by the proposed landscaping along western boundary when viewed from Casula (year 10+) which is satisfactorily demonstrated within the revised Concept Plan for the Site which articulates the provisional landscaping proposed across the Site in accordance with the requirements bestowed under the UDDR recently approved for the Site.</p> |

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**Table 3: Response Matrix**

| Relevant Entities Response to Submissions                                                            | Formalised Response |
|------------------------------------------------------------------------------------------------------|---------------------|
| <b>NSW Department of Planning, Industry and Environment – Biodiversity and Conservation Division</b> |                     |
| <i>The Environment, Energy and Science Group of DPIE have no comments on this modification.</i>      | Noted and agreed.   |

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**Table 4: Response Matrix**

| Relevant Entities Response to Submissions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Formalised Response                                                                                                                           |
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| <b>Department of Planning, Industry and Environment – Hazards</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                               |
| <p><i>In noting from EA Section 3.2 that the Applicant intends to modify condition B176, it would be critical for the Applicant to clearly identify the subject warehouse in a consistent manner within all the relevant documents and plans. This would allow the condition be modified to allow for the subject warehouses to store DG within the limits specified in the PHA. If the Applicant intends to store DG above SEPP 33 thresholds in other warehouses in future, condition B176 needs to be modified progressively for the relevant PHAs to be submitted pre-approval. This approach is in-line with the proper application of SEPP 33, requiring a PHA to be submitted during environmental assessments and not post-approval.</i></p> | <p>This item is in relation to <b>SSD 7709 MOD 1</b>, for which addresses all comments pertaining to Dangerous Goods across the MPW site.</p> |
| <p><i>Clear identification of the warehouses is also critical to ensure that the PHA has been conducted in context of the other land uses surrounding the subject warehouses. These other land uses, although may be within SSD 7709, are still considered off-site risk receptors in context of the Department's HIPAP No. 4. In this sense, we expect an analysis of full warehouse fires be performed in the PHA for the subject warehouses to demonstrate impacts to adjacent land uses, if any. We note that the analysis for full warehouse fire was not included in the current PHA, referring to PHA Section 4.14.1.</i></p>                                                                                                                 | <p>As above.</p>                                                                                                                              |
| <p><i>Moreover, we note that the current PHA did not assess the cumulative risk from both subject warehouses to surrounding land uses against the Department's HIPAP 4 land use safety risk criteria. Although we note that likelihoods are analysed in terms of probability in various sections in the PHA, the cumulative risk analysis was not clearly analysed in terms of frequency per year which is the basis of the HIPAP 4 criteria (i.e. 50 x 10<sup>-6</sup> chances per year for individual fatality risk at industrial land uses).</i></p>                                                                                                                                                                                              | <p>As above.</p>                                                                                                                              |
| <p><i>Considering the above, we request the following information to enable a detailed review of the PHA. Further information may be requested after considering the responses during the detailed review.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <p>As above.</p>                                                                                                                              |

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| <i>1. clear plans/diagrams indicating:<br/>a. the location of the subject warehouses in context of the other warehouses within SSD 7709 and other land uses around SSD 7709;<br/>b. the location of all dangerous goods and hazardous chemicals storages (class and maximum quantities) within the site plans of the subject warehouses and verify that this storage arrangement would be able to comply with all relevant Australian Standards.<br/>c. consequence areas and risk contours bases on plans/diagrams a and b above.</i> |           |
| <i>2. analysis for full warehouse fire for the subject warehouses, including analysis if toxic combustion products from this fire in view of the range of dangerous goods classes to be stored within the warehouses.</i>                                                                                                                                                                                                                                                                                                              | As above. |
| <i>3. revise the probabilistic risk analysis in the PHA to be consistent with the Department's HIPAP 4 frequency-based land uses safety risk criteria and assess the cumulative risk from both subject warehouses to surrounding land uses against HIPAP 4.</i>                                                                                                                                                                                                                                                                        | As above. |

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**Table 5: Response Matrix**

| Relevant Entities Response to Submissions                                                                                                                                                             | Formalised Response |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| <b>NSW Environment Protection Authority (Rob Hogan – Manager Regulatory Operations – Metro West)</b>                                                                                                  |                     |
| <i>The EPA has reviewed the modification proposal and considers that the proposed management measures outlined adequately address the key environmental issues. As such, the EPA has no comments.</i> | Noted and agreed.   |

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**Table 6: Response Matrix**

| Relevant Entities Response to Submissions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Formalised Response |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| <b>Heritage NSW</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                     |
| <i>On the basis of the information provided, the proposed modification does not appear to have any additional effect on Aboriginal cultural heritage that was not already approved under the SSD 5066 development consent. Any Aboriginal cultural heritage management actions required for the project should continue to be undertaken in accordance with the existing conditions of consent. We recommend any management plans that exist for the project should be revised to reflect the changes in design if this modification is approved.</i> | Noted and agreed.   |



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**Table 7: Response Matrix**

| Relevant Entities Response to Submissions                                                                                                                                                                                                          | Formalised Response |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| <b>TfNSW (Pahee Rathan – Senior Land Use Assessment Coordinator)</b>                                                                                                                                                                               |                     |
| <i>TfNSW has reviewed the modification application and raises no objection to the adjustment to the operational boundary and building height in relation, subject to previous TfNSW comments and conditions for SSD-5066 remaining applicable.</i> | Noted and agreed.   |

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**Table 8: Response Matrix**

| Relevant Entities Response to Submissions                                                                                                                                                                                                                    | Formalised Response |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| <b>Sydney Water (Kristine Leitch – Growth Intelligence Manager)</b>                                                                                                                                                                                          |                     |
| <b>Building Plan Approval</b>                                                                                                                                                                                                                                |                     |
| <i>The approved plans must be submitted to the Sydney Water Tap in™ online service to determine whether the development will affect any Sydney Water sewer or water main, stormwater drains and/or easement, and if further requirements need to be met.</i> | Noted and agreed.   |

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**Table 9: Response Matrix**

| Relevant Entities Response to Submissions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Formalised Response |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| <b>Endeavour Energy (Cornelis Duba – Development Application Specialist)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                     |
| <p><i>Whilst it is indicated that the total warehousing GFA will remain unchanged across the Site (215,000 m2), the increased heights resulting in higher volumes / density of the buildings may result in an increase in the peak demand at Anzac Village Zone Substation and changes to the local network to accommodate the higher loads.</i></p> <p><i>Endeavour Energy will continue to monitor the load growth on Anzac Village Zone Substation. Any possible augmentation that may be required of the zone substation is not a prerequisite for the requested modifications being approved by the Department and new development proceeding.</i></p> <p><i>Subject to the foregoing Endeavour Energy has no objection to SSD-5066-Mod-2 request to modify the Moorebank Intermodal Precinct West – Concept Plan and Stage 1 development consent (SSD-5066).</i></p> | Noted and agreed.   |

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**Table 10: Response Matrix**

| Relevant Entities Response to Submissions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Formalised Response                                                                                                                                                                                                                                        |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Georges River Environmental Alliance (Sharyn Cullis – Secretary)</b></p> <p><i>This is a specific objection to the adjustment of the southern operational boundary and building height from approximately 21m to 45m above ground level. Given that a prior approval has enabled a significant increase in elevation of the Moorebank West Intermodal site above the landscape (of 2-3metres) through the importation of fill across the whole site, this will further increase the visible scar of the bulky and high built form.</i></p> <p><i>The Variation Request (Clause 4.6 and 4.3) notes the non-compliance in terms of increasing the height by 114.29% which is ridiculously excessive. The Planning Report for this proposal (SSD-5066, authored by Willow Tree Planning Consultants) notes the significance of visual impacts within the context of "Landuse Conflict". (S.6.2.4, especially pp. 45-6) In describing those, the assessment, on behalf of the proponent, from a number of viewpoints, is of low to moderate for many of those. Given the subjectivity of the concept of 'significance', these findings are highly contestable, and arguably biased in favour of the project proponent. We argue that visual impacts have been grossly under-estimated, just as an example, the viewpoints from Casula Rd, and Canberra Ave, will be negatively impacted to a far greater extent to that predicted in the Report, in our opinion. So therefore, the need for mitigation measures are even greater than what would otherwise be anticipated.</i></p> <p><i>This report cites the Roberts and Day recommendations for key mitigating measures that include the retention of dense vegetation and established trees surrounding the site for screening and additional landscaping and screen planting to reduce the visual impact in close proximity.(p. 48) However this mitigation does not look at all feasible unless there is some change to the concept plan, and potentially the warehousing and hardstand footprint to accommodate it. Such changes are essential, should there be an approval of this modification, as this mitigation in essential. Not only is it justified on the</i></p> |                                                                                                                                                                                                                                                            |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>The height justifications proposed have been comprehensively and satisfactorily addressed in relation to the Submissions raised by both the NSW DPIE and Council, for which further justification is not considered to be required in this respect.</p> |

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*grounds of unacceptable visual impacts, but also as a very essential climate related "heat island" mitigation strategy. In this regard it is essential that new information be considered. A recent University of Western Sydney study to benchmark the compounded impacts of climate change and intense urbanization predicts dire future summer maximum daily temperatures for western Sydney.*

<https://researchdirect.westernsydney.edu.au/islandora/object/uws:52978>

*Though based on Campbelltown, its findings imply this could also be a particularly serious outcome for this vast hardstand and hard rooved Intermodal development in Moorebank. This suggests very serious attempts at heat mitigation through compensatory increases in localized and integrated vegetative cover, should be made through strict conditions of consent, for any new approvals. This also requires that the concept plan be modified, because the current areas and configurations of the warehouses do not present any feasible areas large enough for the amount of mitigating landscaping, vegetation retention and new plantings required. Please note, that given the vast coverage areas of mature trees still on this site, vegetation retention rather than replacement is desirable as it will yield immediate mitigating benefit.*

*We do not accept that the stormwater and soil management as proposed is satisfactory. (S. 6.4) Instead, since there is a large stand of mature native forest (an endangered ecological community) still standing close to the main E-W stormwater channel, it should be retained as a bushland corridor for its visual, ecological and cooling values. Similarly, around any other stormwater infrastructure, any existing native vegetation should be kept. Particularly any hollow bearing trees should be a priority for retention.*

This is a historic issue that has previously been addressed within the Stormwater Design Development Report previously approved for the Site under **SSD 7709 MOD 1**. Further consideration is not required in this respect.

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**Table 11: Response Matrix**

| Relevant Entities Response to Submissions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Formalised Response                                                                                                                                                                                                                                                                                                                                                        |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>East Liverpool Progress Association</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                            |
| <p><i>One sad and consequential fact is that there has never been an objective evaluation of the suitability of the site for its proposed development and use. This is due to the fact, explained below, that the MPE and MPW sites have been aligned for or against the interests of a single citizen and his corporate entity(s).</i></p> <p><i>This fact is the historical division of Mr. Chris Corrigan as hero and villain along the major political divide at work in Australia at all levels of government. There is his influence to lawfully advance the idea of Moorebank as a freight intermodal, via Liberal National Party election policy in 2004. There is his presence to stir up the local Labor tribal animosity near Moorebank at that time. With that agitation advancing to a NSW Planning Minister's office to see a Ministerial appointed body of business, industry, union and government appointees gives collective approval for MPW to emerge as a Report Recommendation in 2005 to become an Albanese infrastructure project from 2007.</i></p> <p><i>That flow of activism saw the Labor promoted MPW used as a weapon to frustrate the advancement of MPE for almost four years. This was done via the Commonwealth withholding Land Owner Consent for MPE to connect to the freight rail link lines. This was reversed months after the 2013 election win by the LNP. Volumes of FOI documents exhibit prominent business and industry leaders making representations to Labor Ministers / Public Servants, as well as to Prime Minister Gillard, to see her bat them away to an underling.</i></p> <p><i>The Corrigan interests then set about taking full advantage, as a hard-done-by corporate moral right it seems, of maximizing the benefits of the generous outcome granted to them in MPW. Indeed, the Qube Corporate Key Management team was rewarded with \$1.5 million of bonuses in delivering the product.</i></p> | <p>Whilst the adjoining Submission item is comprehensive at length, it also raises no material objections in relation to the specific modifications proposed and is purely made on the basis of what appears to be a personal objectified vendetta against the Applicant. Further consideration is not considered to be required with respect to this Submission item.</p> |

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*The upcoming Class 1 Merit Appeal in the NSW Land & Environment Court against MPW's Stage 2 approval will highlight the deficiencies of Moorebank as a suitable site for such a development with its traffic generation and worsening of existing bad air quality. There are other deficiencies, but these two are observable facts. Moorebank, in East Liverpool, is river-bound. It lays in a low river basin where bad air is observable. These facts are empirical, they can be seen, and they are measured.*

*The origins of Mr. Corrigan's interests in Moorebank was reported as observing these Commonwealth lands from the comfort of his recreational helicopter. He failed to observe the fact that East Liverpool is river bound on three sides, it is bridge reliant, and flood prone. He failed to observe that to its immediate south is the historic inalienable Liverpool Military Area which is aligned to the east side of the Georges River for over 25 kilometres. There are no other roads servicing the whole south west suburban and industrial region. The M5 Motorway is it. It travels due west from the Kingsford Smith Airport, and turns left at Moorebank/Casula to feed the burgeoning far south west of Sydney. East Liverpool is a regional traffic corridor that carries traffic counts that match the Sydney Harbour Bridge and Tunnel. It is already congested. Any new road works will not ameliorate the congestion due to the need for heavy trucks to merge into congested but flowing regional traffic as slow moving vehicles. MPE vehicles are already worsening the congestion in this recognised Traffic Black Spot.*

*The East Liverpool Progress Association recognises the need for infrastructure to service both public and private industrial requirement. It acknowledges that the public interest requires decisions by Government that affect citizens where they live in marginal locations. Such decisions would need to be based on sound and fair financial analysis. Such analysis needs to be true and open to public scrutiny. In the case of the Moorebank Intermodal, all of those points have failed. There is no published Business Case. It is a fact that the \$1.5 billion of tax payer funded costs did not feed into the final published financial analysis. A false figure has been used by the successive governments to justify dumping a 24 x 7 diesel emitting, noise emitting, light emitting industrial operation within 600 metres of established residential housing.*

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*These latest Applications- SSD-5066-Mod-2 and SSD-7709-Mod-1 - continues the aforementioned maximization of benefit by the Applicant. Their request represents the worst of corporate values; that enough has to be more and more.*

*We strongly object to the application, and condemn the behaviour of the applicant and all involved, be it active or in their silence, with the advancement of the Moorebank Intermodal as a project in the public interest. As represented herein its origins were in error by Mr. Corrigan that could have been easily argued in an open forum. Its continuance has been worse than error, to the point of perversion where other agendas were played out across the structures driven by elites in politics, business and the people they employ with fear and plenty of favour. It stands as a sad and costly monument of broken public trust.*



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**Table 12: Response Matrix**

| Relevant Entities Response to Submissions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Formalised Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Residents Against Intermodal Development (RAID)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <p><i>Put simply, or put in layman's terms: Good Public Planning is not to be measured by private profit motivations; and it is not to be assessed solely on what may or may not be legally permissible or legally altered after the fact. NO. Good Public Planning is instead defined by suitability to a locality and based on the net environmental, social and economic impacts to those most affected. More importantly good Public Planning must have strategic value to the Public Good, by responding to the moral and ethical duty the state has for its current and future citizens. That is Us, our families and their healthy, safe and prosperous futures.</i></p> <p><i>A thorough reading of the materials presented by the proponent, in this application, read as follows. 'We want this, and because we want it, you must give it – and by the way – we've added in our own legal advice, so the department best be complicit, and the community best be compliant'.</i></p> | <p>There is no such item within the documentation that states, "we want this, and because we want it, you must give it – and by the way – we've added in our own legal advice, so the department best be complicit, and the community best be compliant".</p> <p>The Legal Advice explored the potential to undertake the Proposal by virtue of a Modification Application, for which it is considered that the subject Modification Application is capable of being approved pursuant to Section 4.55(2) of the EP&amp;A Act. Whilst the proposed increase in building height from 21 m to 45 m for the two (2) Warehouses and Distribution Facilities appears significant when considered in isolation, the character and purpose of the original development (SSD 7709) as a whole will remain unchanged (i.e. a 24/7 operational Warehousing and Distribution Facility), as will the essential feature of the original development (i.e. achievement of a throughput volume of up to 500,000 TEUs).</p> <p>Accordingly, the Planning Report and respective consultant reports reinforce the notion of 'good public planning' as the Submission suggests, by analysing the strategic importance and environmental factors associated with both the Subject Site and the modifications proposed.</p> <p>Furthermore, the Submission does not raise any weighted or objectified claims with respect to the proposed modifications, nor does it raise any comments in relation to the material included as part of the Modification Application which require any further consideration by the Applicant.</p> |
| <p><i>A review of publicly available environmental planning instruments; the development control plan; the regulations; the existing conditions of consent; and the impacts of the development, the subject of these applications, classify them as irrefutably not suitable to this site and are not in the public interest. Thorough reading of the relevant material identifies that the local social and economic disbenefits are too great and the human, natural and built</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <p>RAID do not expressly exemplify why the proposed modifications are not suitable to the Site and the public interest. Moreover, the Planning Report and respective Plans and consultant reports consider all applicable Environmental Planning Instruments; the LDCP2008; both the EP&amp;A Act &amp; Regulations; the Conditions of Consent pertaining to both SSD 5066 and 7709; and the potential environmental, social and economic impacts as a result of the proposed modifications.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

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*environments will suffer illogical, preventable and perhaps illegal negative impacts. In particular the proposed development is not fit for purpose and contravenes the conditions of consent. There are extra consequentially adverse impacts to Transport and Traffic access, Air Quality and Noise Pollution across the entire site and region. These being on top of the identified negative impacts of Height of Buildings [HOB], Noise + Light Pollution, Visual Amenity and Dangerous Goods.*

Review of the Submission notes, that “the relevant material identifies that the local social and economic disbenefits are too great and the human, natural and built environments will suffer illogical, preventable and perhaps illegal negative impacts.” This is factually incorrect. The documentation provided outlines the proposal’s compliance (despite the height departure proposed) and consistency with the relevant applicable Policies, Strategies, Development Standards & Controls, as well as existing Conditions of Consent that apply to the Subject Site requiring due consideration.

With respect to specific parameters listed, the following comments are noted as follows:

1. **Traffic:** As confirmed in the *Transport Assessment* 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.

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).

2. **Air Quality:** As confirmed by Northstar (2020) in their Air Quality Impact Assessment (AQIA), the proposed modifications would not detract or exceed from the air quality emissions criteria established under **SSD 7709**, for which there are no significant changes anticipated to the inputs previously assessed and approved which would result in a material change as proposed under the subject Modification Application. Furthermore, in

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relation to odour, given the materials to be handled as part of the operational outcomes proposed, the adoption of appropriate waste management practices is anticipated to result in no such odour impacts at the surrounding receptor locations.

3. **Noise:** Further design refinements pertaining to the proposal have also been undertaken, which has resulted in no change in the predicted noise levels for the nearest potentially affected receivers in Casula. The proposal Noise and Vibration Impact Assessment (NVIA) has been revised with the updated noise predictions. Additional predicted noise levels for Glenfield Farm and for the residential receivers in Glenfield have been added to address submission comments, all of which achieve the proposal criteria.

Accordingly, the subject Modification Application has included a revised NVIA (refer to **Appendix 7**) which reviewed in detail, the noise emissions from the current proposal, and the proposed design, which includes feasible and reasonable mitigation measures to account for any project noise emissions as a result of the Proposal.

4. **Visual:** The Visual Impact Assessment report assessed the overall cumulative visual impact 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 the proposed landscaping along western boundary when viewed from Casula (year 10+) which is satisfactorily demonstrated within the Landscape Plans for the Site.
5. **Dangerous Goods:** 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 (refer to **Appendix 8**). 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.

The proposed modifications to Development Consent **SSD 7709** are considered to

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|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                          | be of minor environmental impact, given the extent of changes proposed to the approved development. Accordingly, the development as proposed to be modified would remain substantially the same as the original development. |
| <i>RAIDM INC's position has always been and continues to be that the intermodal(s) represent the wrong project in the wrong place, at the wrong time and that the entire 300ha (still has tremendous) potential for integrated land use planning for much needed jobs, homes and public transport on our riverfront.</i> | Noted.                                                                                                                                                                                                                       |

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**Appendix 1**

**Revised Moorebank Precinct West Concept Plan**

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## **Appendix 2** Visual Impact Assessment JN

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## **Appendix 3** Visual Impact Assessment JR

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## **Appendix 4** Socio-Economic Assessment



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**Appendix 5**  
Response to Public Submissions