

16 February 2021

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Mr Jim Betts
Secretary
Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2001

Attn: Candice Pon – Planner, Key Sites Assessments

Dear Candice,

RE: Response to Submissions for SDD 8588 (Mod 5) - Eastern Creek Quarter Stage 1

Ethos Urban has prepared this letter on behalf of Frasers Property Australia in response to the Department's letter dated 3 November 2020 requesting a response to the submission received from Blacktown City Council in relation to SSD 8588 Mod 5. **Table 1** below outlines our response to each of the matters raised by Council and a copy of the Loading Dock Management for the site is included at **Attachment A**.

As part of the response, the application has been amended to only seek an extension of operating hours for the Woolworths loading dock. Accordingly, it is proposed to replace Condition F2 of the consent with the following condition:

The loading docks shall not operate outside the following hours:

Loading and Unloading	Monday to Saturday	Sunday
Supermarket Loading Dock	5am – 10pm	
Specialty Retailers Loading Dock	7am – 6pm	8am – 5pm

An updated Acoustic Assessment is provided at **Attachment B** which reflects the proposed amended breakdown of the loading dock hours.

Table 1 Response to issues

Issue	Response
1. Whilst the acoustic report has examined a scenario demonstrating that noise levels could meet the criteria it doesn't outline how this will be achieved operationally.	<p>The acoustic report submitted with the application concludes that the noise levels can be achieved subject to the following mitigation measures:</p> <ul style="list-style-type: none"> Operating hours for the Woolworths loading dock being restricted to 5am to 10pm. Any garbage removal is to occur within the currently approved hours of the site (9am to 5pm Monday to Sunday). Use of the loading dock within the extended hours is to be limited as follows: <ul style="list-style-type: none"> Morning shoulder period (5am – 7am): up to one large truck / heavy vehicle OR three small delivery trucks / cars / vans in a given 1 hour period. Evening period (6pm – 10pm): Up to one large truck / heavy vehicle AND three small delivery trucks / cars / vans in a given 1 hour period. Bail and/or garbage compactors are to be used only within the loading dock area, and are not to be used between the hours of 5am and 7am. Vehicles associated with the loading dock should not arrive / depart to the loading dock outside of the hours of 5am to 10pm.

Issue	Response
	<ul style="list-style-type: none"> Vehicle engines are to be switched off during loading and unloading within the dock. <p>In addition, a copy of the centre's Loading Dock Management Plan is provided at Attachment A. This document outlines the management arrangements for both the Woolworths and specialty retailer's loading docks, and a further addendum has been prepared which provides additional detail in relation to the Woolworth's online delivery dock (the subject of the extended hours).</p> <p>It is also noted that as Home Deliveries use small trucks, there are no pallet jacks used (the totes are only pushed into the truck), hence there will be no noise impacts associated with the loading.</p> <p>Furthermore, the centre has been successfully operating with extended loading dock hours since the start of the COVID-19 pandemic, pursuant to <i>State Environmental Planning Policy Amendment (COVID-19 Response) 2020</i>. Notably, the loading dock hours it has been operating with since the start of the pandemic exceed those sought under the subject modification application and have not resulted in any complaints from surrounding residents.</p>
<p>2. The scenario uses a very specific combination of vehicles which the truck drivers are not going to be aware of when their routes are scheduled. They would need some sort of dock marshal to ensure the truck combination is adhered to</p>	<p>The extended hours are only required for the Woolworths tenancy and therefore the deliveries can be tightly scheduled and controlled. Trucks are set out on a roster/timeslot to prevent stacking as this affects customer delivery times (which is not in Woolworths best interests). Opening the dock earlier will prevent any issue with stacking as this will give Woolworths the ability to manage the truck delivery times for online and their warehouse deliveries better than the more condensed window at present.</p>
<p>3. The acoustic report also doesn't make mention of what would happen if the truck combination fails, trucks won't leave and come back later, it is more likely they would idle outside of the acoustic barrier waiting for a slot in the dock to open up.</p>	<p>As above, the extended loading hours will help mitigate dock congestion as Woolworths will have a longer operating time which allows the truck movements to be spread over more hours. The number of truck movements will not increase from that identified within the Acoustic Report and referenced in the mitigation measures above.</p>

Should you have any further queries about this matter, please do not hesitate to contact me on 9409 4953 or cforrester@ethosurban.com.

Yours sincerely,



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