



In reply please quote: 22/10304

Contact: Kerren Ven on (02) 9725 0878

17 June 2022

Industry Assessments  
Department of Planning, Industry and Assessment  
GPO Box 39  
SYDNEY NSW 2001

Dear Sir/Madam,

**EIS ADVICE FOR SSD-36156297 DHL FACILITY (ASSOCIATED WITH SSD 5248 MOD 1) GAZECORP INDUSTRIAL ESTATE AT 813-913 WALLGROVE ROAD, HORSLEY PARK**

I refer to the Department's recent correspondence requesting advice on the Environmental Impact Assessment for the proposed construction and operation of a new warehouse and distribution centre (DHL) comprising:

- Revision of the lot boundaries of approved Lots 11, 12 and 13 to create the required 52,700 m2 lot for the DHL facility in the north-western part of the Gazcorp Industrial Estate.
- A residual area on what was part of Lot 13 will be to be subdivided into two lots of approximately 11,000 m2 each.
- An industrial warehouse approximately 29,710sqm split over two levels, including two smaller dock office spaces,
- Construction of an internal access ring road with access to loading docks on the east and west sides of the warehouse, and
- Construction of light vehicle car parking area for 196 cars with separate access to the estate road.

The current modification application relates to the concept approval to the site at 813-913 Wallgrove Road, Horsley Park (SSD 5248 Mod 2). It is understood that both applications rely on the same EIS and technical reports for assessment of the new warehouse and distribution centre impacts as part of the overall estate. In this regard this letter applies to both SSD applications.

Council officers have reviewed the Environmental Impact Statement prepare by Urbis dated 31 March 2022 and supporting technical assessment reports. It is requested that the following matters be further addressed in the response to submission.



## Traffic related matters

- All issues raised by Transport for NSW in relation to the application shall be satisfactorily addressed prior to determination.
- A breakdown of the types of heavy vehicles accessing the site (12.5 heavy rigid vehicles, 19 m semi-trailers, 26m B-double vehicles, 30m super B-Double vehicles etc.) and the expected daily and weekly movements of each shall be submitted to Council for assessment.
- The site does not make provision for a loading bay to accommodate 26m B-Double or 30m super B-Double vehicles. Clarification is required about where vehicles exceed 25m in length would park on-site to carry out loading and unloading activities. Service vehicles shall only carry out loading and unloading activities from the designated loading areas and shall not obstruct the flow of traffic within the site.
- Swept path diagram (file names AG1877-04-v02.dwg sheets AG02) indicates that both 26m B-Double vehicles and super B-Double vehicles turning left out of the site onto the Estate Road would encroach into the lane of oncoming traffic. Additional information shall be submitted to address this concern.
- Concern is raised regarding the site which allows B-Double vehicles parking close to the northern boundary of the site impacting vehicles manoeuvring within the site. There are risks with heavy vehicles colliding with the parked B-Double vehicles. The applicant shall submit further information to address this concern.
- Swept path diagram (file names AG1877-04-v02.dwg sheets AG02) also shows that 26m B-Double vehicles and 30m B-Double vehicles turning left out of the site at the same time would not be possible. The exit driveway that allows two exit movements simultaneously shall be reviewed and additional information shall be submitted to Council for assessment.
- The applicant has not submitted swept path diagrams to demonstrate how 26m B-Double vehicles or 30m super B-Double vehicles can satisfactorily turn into the site from the proposed Estate Road.
- A loading management plan providing a summary of the types and the frequency of vehicles servicing the site throughout a day shall be submitted to Council for assessment. Note this can be conditioned as part of the consent.
- Survey plans showing dimensions, grades and levels of the Estate Road and its exact location shall be submitted for assessment and the new road shall be constructed to the satisfaction of the relevant sections of Council.
- The applicant shall undertake swept path analysis to demonstrate that the largest vehicle can satisfactorily travel to and from the site via the requested route (entire route) without impacting traffic (other road users) on the external road network.
- The applicant shall engage a suitably qualified person (Accredited Road Safety Auditor) to undertake a road safety audit for the proposed Estate Road to ensure that the road capacity is adequate to cater for the intended design vehicles. The objective of a road safety audit is to identify foreseeable hazards for all road users and with the identified issues being addressed to the satisfaction of the Accredited Road Safety Auditor.

## Stormwater Management

- Permissible site discharge for the Rural Zone in the FCC Stormwater Management Policy is 78l/sec/ha, not the 140 stated in their report. The On Site Detention is to reviewed and adjusted to meet the correct requirements.

- A maintenance plan for the OSD & WSUD systems are to be provided for review.
- A condition should be included for the construction of the swale drain along the northern side of Lot 11/12 (DHL Warehouse) as part of the Subdivision Works Certificate.

## Environmental Management

### Dangerous goods:

- The applicant shall confirm if the proposed activity “the storage of dangerous goods” is a scheduled activity under the Protection of the Environment Operations Act 1997 and is required to be licensed by the NSW EPA.

Clause 9, of Schedule 1, of the Protection of the Environment Operations Act 1997, states:

*“General chemicals storage, meaning the storage or packaging in containers, bulk storage facilities or stockpile of any chemical substance classified as a dangerous good in the Transport of Dangerous Goods Code, other than the following:*

- a. Petroleum or petroleum products,*
- b. Radioactive substances within the meaning of the radiation control act 1990”.*

General chemicals storage with a capacity to store more than 20 tonnes (pressurised gases), 200 tonnes (liquefied gases) or 2000 tonnes (chemicals in any other form) is declared to be a scheduled activity.

If the proposed development is deemed to be a scheduled activity, then the SSD is required to be referred to the NSW EPA for assessment and comment.

### Air quality:

- The Air Quality Assessment prepared by SLR Consulting Australia Pty Ltd, dated February 2022, Reference No. 610.30621-R01 version 1, lacks sufficient information in that it does not provide an assessment of air/odour emissions associated with the operation of the warehouse and distribution centre. As a result the applicant shall submit an AQA that assesses the impact of air emissions (air pollutants) and odours that may be emitted during operation of the proposed warehouse and distribution centre on nearby receivers as per the SEARs.

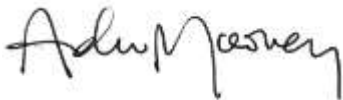
### Noise:

- Acoustic Report, prepared by acoustic logic, dated 2 April 2022; REF: 20211281.1, states “we have been informed the predicted generation of vehicles are: 86% light vehicles, 8.4% rigid, 7.6% articulated trucks. In addition, it states it is assumed that during the night-time (10pm to 7am) operation, the maximum vehicle movements are at 25% capacity of the peak hour numbers. Acoustic Consultant shall provide further information as to where the information was obtained from for further consideration of noise impact.

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- Several sections of the acoustic report refers to section 8 Noise Emission Objectives. Acoustic Consultant shall clarify which section of the report contains information relating to acoustic treatments.
  - The applicant to provide a detail Plan of Management (operations plan) that includes (at minimum) detail on:
    - a. Noise Management Practices,
    - b. Complaints Handling Procedure
    - c. Waste Management Strategies.
    - d. Incorporating acoustic report recommendations
    - e. Yearly Environmental Audit to be undertaken by a qualified environmental consultant

Thank you for providing Fairfield City Council with the opportunity to comment on the above mentioned state significant development. If you have any questions regarding the above, please contact Kerren Ven on (02) 9725 0878.

Yours faithfully



Andrew Mooney

**EXECUTIVE PLANNER, STRATGIC LAND USE PLANNING**