



Mr Richard Johnson
Director
Aspect Environmental Pty Ltd
117/25-27 Solent Circuit
BAULKHAM HILLS NSW 2153
– via email –
richard@aspectenvironmental.com
8 December 2020

Dear Mr Johnson

**Moorebank Intermodal Precinct West – Stage 2, Modification 1 (SSD-7709-Mod-1)
Applicant's Response to Request for Additional Information**

I refer to the response to submissions provided on 3 December 2020, in response to the Department's request for additional information for the Moorebank Intermodal Precinct West – Stage 2, Modification 1 application (SSD-7709-Mod-1).

The submitted response is not sufficient for the Department to progress its visual and traffic impact assessments for the proposed modification, and additional information is required.

A request for further information relating to visual and traffic impact assessments is detailed in **Attachment 1**. The information provided in **Attachment 1** provides and supplements the Department's earlier request of 12 November 2020 to assist in your understanding of why this information is required.

You are requested to provide the information, or notification that the information will not be provided, to the Department by Tuesday 22 December 2020. If you are unable to provide the requested information within this timeframe, you are requested to provide, and commit to, a new timeframe detailing the provision of this information

Please also note that the Department procured the services of acoustic specialists Northrop Pty Ltd and they have undertaken an independent review of the following reports submitted as part of the application:

1. Noise & Vibration Impact Assessment (Renzo Tonin & Associates, 8 July 2020);
2. Operational Noise Management Review (Renzo Tonin & Associates, 30 June 2020); and
3. Modification Application Planning Report (Willow Tree Planning, 21 July 2020).

Following a preliminary review of the information contained within the above documents, Northrop has indicated support for revising noise limits set out under Condition B131 of SSD-7709.

However, in order to consider the revised noise limits, some additional information is required to complete the noise and vibration assessment, particularly in relation to assessment of potential sleep disturbance impacts and the proposed noise wall. A Gap Analysis prepared by Northrop is provided at **Attachment 2** for your consideration and response where appropriate.



If you have any questions, please contact Nathan Stringer, who can be contacted on 02 9995 5531 or via email at nathan.stringer@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'KH' followed by a flourish.

Karen Harragon
Director
Social and Infrastructure Assessments

Attached: Attachment 1: Further Request for Information 12 November 2020

Attachment 2: Noise and Vibration Assessment Gap Analysis (Request for Information)

ATTACHMENT 1: FURTHER REQUEST FOR INFORMATION 12 NOVEMBER 2020**Visual impact assessment**

The information provided suggests that the revised visual assessments do not revisit all of the vantage points used to inform the visual impact analysis for the approved MPW Stage 2 project (Arcadis, October 2016). Should some vantage points not be revisited, the Department will assume that the visual impact from these vantage points would remain unchanged as a result of SSD-7709-Mod-1. Please confirm whether this is the case; if not, please ensure that the revised assessment revisits and references all vantage points used to inform the approved MPW Stage 2 visual impact analysis prepared by Arcadis (October 2016).

Traffic impact assessment

The Department has reviewed the response to submissions provided on 3 December 2020, and considers that additional information is still required to identify the traffic impacts of the MPW Stage 2 development, as proposed to be modified.

The Department is requesting further information in relation to the following matters:

1. The adequacy of the assessment of overall traffic impacts of MPW Stage 2, if it is modified as requested. It is not clear what the traffic generation rates are for the remaining warehousing + Intermodal Terminal operations in the submitted information, and what the increase in the potential traffic generation is compared to the approved MPW Stage 2 warehousing + Intermodal Terminal operations.
2. The presentation of traffic impacts based on 'PCU', whereby one car is one PCU, and a truck is two PCU (including the basis for adopting that particular ratio, such as relevant guidelines that have been used to inform this methodology). The concept of PCU is not presented in the MPW Stage 2 EIS, and it is unclear why this information is now being relied upon and presented to support a modification to the original assessment.
3. Whether the existing road network upgrade conditions are adequate, noting that the traffic information provided by the applicant in the MOD 1 application suggests that high-bay warehousing has distinct and different traffic impacts compared to the standard warehouses approved in MPW Stage 2. The Anzac Road/Moorebank Avenue signalised access is proposed to cater for the MPE + MPW cumulative developments. The applicant should confirm whether the additional operational traffic from the conversion of approved warehousing to the high bay warehousing will require additional storage bay capacity to the Moorebank Avenue/Anzac Road signalised intersection.
4. If the above requested information shows that there is an overall increase in operational traffic generation then it must be demonstrated as part of this modification application that the right turn storage bays on Moorebank Avenue are still able to cope with additional traffic during AM and PM peak periods.

In support of the comments above, the information requested on 12 November 2020 is still required to ensure that the Department is able to undertake a robust assessment of the modification application. Until it is provided, the Department is unable to complete its assessment.

The Department requests that the Applicant provides an updated traffic impact assessment that addresses the comments above and provides the information requested in the table **below** (which contains additional information clarifying the assessment reason the information is again sought).

Requested information	Assessment reason for request for information																				
<div>1.</div> <div>What is the predicted traffic generation from the balance of the site (i.e. the remainder of the development other than the JN+JR Warehouses) as proposed to be modified?</div>	<div>The Department considers that SSD-7709-Mod-1 seeks approval for operation of the entire MPW Stage 2, and therefore all impacts must be fully assessed. However, SSD-7709-Mod-1 does not present traffic generation for the balance of the site.</div> <div>This information is required for the Department to assess the overall traffic of the proposal, inclusive of all warehousing permitted either under the original approved development and/or the MOD.</div>																				
<div>2.</div> <div>What is the total predicted traffic generation of MPW Stage 2, as proposed to be modified, incorporating both the balance of site (as per 1. above) and the JN+JR Warehouses?</div>	<div>The Department considers that SSD-7709-Mod-1 seeks approval for operation of the entire MPW Stage 2, and therefore all impacts must be fully assessed.</div> <div>Alternatively, the Department would require confirmation that the applicant no longer seeks approval for use of (and/or traffic to and from) the other warehouses.</div>																				
<div>3.</div> <div>What is the total traffic generation of MPW Stage 2, as proposed to be modified, as compared to:<div>a. the MPW Stage 2 approved trips,</div><div>b. MPW Concept (as modified) trips, and</div><div>c. whole-of-precinct (MPW+MPE) cumulative assessment?</div>Please complete in the format below, providing supporting analysis and modelling results as necessary to explain the findings in respect of daily trips and AM and PM trips.</div> <table><tr><td></td><td>Whole-of-precinct (MPW+MPE)</td><td>MPW Concept (as modified) trips</td><td>MPW Stage 2 approved trips</td><td>MPW Stage 2 MOD 1</td></tr><tr><td>Light vehicle trips</td><td></td><td></td><td></td><td></td></tr><tr><td>Heavy vehicle trips</td><td></td><td></td><td></td><td></td></tr><tr><td>Total</td><td></td><td></td><td></td><td></td></tr></table>		Whole-of-precinct (MPW+MPE)	MPW Concept (as modified) trips	MPW Stage 2 approved trips	MPW Stage 2 MOD 1	Light vehicle trips					Heavy vehicle trips					Total					<div>The Department considers that the SSD-7709-Mod-1 should compare the proposed development (including MOD 1) to the approved development, to identify the scale and nature of the proposed change in traffic generation and impacts.</div>
	Whole-of-precinct (MPW+MPE)	MPW Concept (as modified) trips	MPW Stage 2 approved trips	MPW Stage 2 MOD 1																	
Light vehicle trips																					
Heavy vehicle trips																					
Total																					
<div>4.</div> <div>Provide consideration of the impacts of the proposal as amended on performance of key intersections, including Moorebank Avenue/Anzac Road and other key intersections in the local and regional road network, cumulative of all approved developments in the MPW + MPE precincts.</div>	<div>The Department considers that the SSD-7709-Mod-1 should identify any changes to modelled intersection impacts, to determine if the nature or timing of impacts would change from what has been approved.</div>																				
<div>5.</div> <div>Based on the predicted trip generation, identify and asses impacts on road network between opening of JN+JR and prior to completion of intersection upgrades required under MPE+MPW consents, e.g. Moorebank Avenue/Anzac Road under MPW Stage 2, condition B84.</div>	<div>The Department considers that the SSD-7709-Mod-1 should identify any changes to modelled intersection impacts, to determine if the nature or timing of impacts would change from what has been approved.</div>																				
<div>The analysis required above should provide estimates of and consider overall light and heavy vehicle movements – both daily trips, and trips in AM and PM peak times. Care should be given to identifying peak times consistent with forecast traffic generation (including growth) and compared to the peak times analysed in the TIAs prepared for the approved developments.</div>	<div>The Department considers that the SSD-7709-Mod-1 should compare the proposed development (including MOD 1) to the approved development, to identify the change in traffic generation and impacts.</div>																				



ATTACHMENT 2: NOISE AND VIBRATION ASSESSMENT GAP ANALYSIS (REQUEST FOR INFORMATION)