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2 December 2020

Ms Karen Harragon  
Director, Social and Infrastructure Assessments  
NSW Department of Planning, Industry and Environment  
Locked Bag 5022  
Parramatta NSW 2124

**RE: Moorebank Intermodal Precinct West - Stage 2, Modification 1 (SSD-7709-Mod-1)  
Request for Additional Information**

Dear Ms Harragon,

The Request for Additional Information (RfI) in respect of Moorebank Intermodal Precinct West - Stage 2, Modification 1 application (SSD-7709-Mod-1) has been reviewed.

In response to the requested corrections to the visual impact assessment, the revised visual assessment report for each of the warehouses is provided.

A number of additional visual impact analyses were undertaken to demonstrate the potential visual impact of both JR and JN sites on the elevated residential buildings along Casula Road and Canberra Avenue.

The photos were taken from the residential buildings windows/ balconies looking towards the proposal to ensure they provide an accurate representation of the high-bay warehousing. The additional private vantage points were carefully selected from the areas that are more likely to be affected by the proposal.

In general the visual impact on the studied vantage points are assessed as moderate to moderate/ Low. The proposal will be partly covered by the existing and proposed landscaping and will sit in line with the skyline from more elevated vantage points.

Additional private vantage points include:

5 Casula Road:

- located along Casula Road in close proximity to the proposal (in comparison to the rest of Casula neighbourhood)
- is facing the proposal
- have an unobstructed view over the proposal with no street trees in front of the residential building for screening

9 Casula Road:

- located along Casula Road in close proximity to the proposal (in comparison to the rest of Casula neighbourhood)
- land is more elevated
- is a corner lot with more open views towards the proposal
- there is a gap in the street trees fronting the residential building

26 Canberra Avenue:

- oriented towards the proposal
- land is more elevated
- there is no residential building or trees in the lot fronting the residential building

46 Canberra Avenue:

- located along Canberra Avenue in close proximity to the proposal (in comparison to the rest of Casula neighbourhood)
- most elevated location along Canberra Avenue
- two storey building with upper level balcony overlooking the proposal
- have an unobstructed view over the proposal with no trees in front of the residential building for screening

The vantage points have been revisited to ensure the assessment covers the areas of higher sensitivity or the areas that are more likely to be affected by the proposal. In general the selected vantage points include:

- surrounding public roads
- surrounding Regional Park, Parkland and recreational areas
- Casula Arts Centre
- surrounding residential buildings/ private vantage points including the elevated residential buildings overlooking the proposal along Casula Road, Canberra Avenue and Carroll Park

In response to the requested additional information for the traffic impact assessment, it is noted that the requested information is not directly relevant to the modification application. Traffic generation in respect of the two warehouses is within the volume limits as identified within the EIS documentation approved by the Independent Planning Commission (IPC). The modification proposes no change to the approved traffic generation.

The information requested in the RfI relating to predicted traffic generation is largely covered off within Appendix C of the approved Response to Submissions and has been attached for ease of reference.

From the referenced Appendix C and the provided SSD-7709-Mod 1 Transport Assessment, **Table 1** can be extracted to address RfI Questions 3a, 3b and 3c. For comparison a column is included presenting the forecast daily traffic volumes of the Proposal.

In addition, Table 1 includes a row that expresses the established ‘approved’ traffic generation thresholds for each stage in PCUs (Passenger Car Units) where a Light Vehicle (LV – car) equals 1 PCU and a Heavy Vehicle (HV – truck) equals 2 PCU. Expressing a volume of traffic in PCUs enables the traffic impacts of different volumes of traffic – with different mixes of light and heavy vehicles – to be directly compared. Expressing traffic volumes in PCUs is similar to expressing container freight in TEUs (Twenty-foot Equivalent Units).

**Table 1: Established Traffic Volumes/Thresholds**

Type	Answer (Q3c)	Answer (Q3b)	Answer (Q3a)	Proposal
	MPE + MPW Concept Approval	MPW Concept Approval <sup>1</sup>	MPW Stage 2 Approval	JR + JN
LV (veh/day)	9,337	4,855	2,670	1,988
HV (veh/day)	10,798	5,615	1,458	1,654
Total (veh/day)	20,135	10,470	4,128	3,642
<b>Total (in pcu)<sup>2</sup></b>	<b>30,933</b>	<b>16,085</b>	<b>5,586</b>	<b>5,296</b>

Note: 1) Concept approval for MPW is estimated based on the total concept approval of MPE and MPW, assuming MPW accounts for 52% of the total traffic generation.

2) pcu – Passenger Car Unit.

Consistent with the findings of the TA report, Table 1 demonstrates that the Proposal is acceptable in terms of traffic impacts as MPW Stage 2 is approved for impacts consistent with 5,586 PCU and the Proposal would generate 5,296 PCU, leaving a surplus capacity of 290 PCU. Table 1 also demonstrates that the acceptability of the Proposal, which generates HV volumes in excess of the HV threshold, is due to the lower LV volumes forecast compared with the LV threshold.

In order to present this outcome in a manner that is of greater utility going forward, **Table 2** reproduces the currently approved MPW Stage 2 volumes and the proposed allocation arising from MPW Stage 2 MOD 1; it is noted that the table also responds to RfI Question 2.

**Table 2: Approved and Proposed MPW Stage 2 Traffic Thresholds**

Type	Answer (Q3a)	Answer (Q2)	Net change
	MPW Stage 2 Approval	MPW Stage 2 MOD 1	-
LV (veh/day)	2,670	2,126	(-) 544
HV (veh/day)	1,458	1,730	+ 272
Total (veh/day)	4,128	3,856	(-) 272
<b>Total (in pcu)</b>	<b>5,586</b>	<b>5,586</b>	<b>0</b>

Table 2 demonstrates that the proposal does not seek to modify the level of approved traffic impacts from that associated with 5,586 PCU. However, by reallocating the individual thresholds (reduce LVs by 544, increase HVs by 272 and thereby reducing total trips by 272), the approved threshold has been achieved to better accommodate the forecast traffic of the JN+JR Proposal.

Having consideration for the above, **Table 3** presents the surplus approved traffic generating potential of MPW Stage 2 further to the Proposal.

**Table 3: Traffic Generation Impacts of Proposal**

Type	Answer (Q2)	Proposal	Answer (Q1)
	MPW Stage 2 MOD 1	JR + JN	Surplus Capacity
LV (veh/day)	2,126	1,988	138
HV (veh/day)	1,730	1,654	76
Total (veh/day)	3,856	3,642	214
<b>Total (in pcu)</b>	<b>5,586</b>	<b>5,296</b>	<b>290</b>

In response to Rfl Question 4, the proposed modification does not alter the assessed and approved impacts on the road network in a standalone or cumulative sense, under current consents, taking into consideration the prescribed intersection mitigations within each of the respective consents.

In response to Question 5, the proposed traffic generation impacts do not exceed those approved under MPW Stage 2 with the impacts remaining consistent with that associated with 5,586 PCUs. Pending timely design approvals from TfNSW, the required intersection upgrades will be in place to accommodate traffic as required under B84.

The ‘additional analysis requested’ to support the above responses is outside the scope of the current modification application (building height). As a precinct-wide aspect it should be dealt with distinctly from the present modification application

We do, however, acknowledge the importance of continuing to progress the precinct traffic and intersection upgrades, and to this end we are open to further discussion with DPIE and TfNSW. I also note that we currently attend a number of steering committee and other meetings in regards to this matter and look forward to working collaboratively to address future precinct traffic management.

This response to the Department’s request for information is accompanied by updated drawing packages for the JN and JR buildings as follows:

Updated JN drawing pack, Revision I (\*.pdf, A0 format):

The amendments to the JN design drawings included in this pack are:

- Changing the building signage branding from Woolworths to Primary Connect and adopting a similar colour scheme – resulting in nil change to visual impacts
- Reduction in the high bay overall height by 1.3m – improving the visual impacts further than what was included in the Response to Submissions
- Adjustment to the north east corner of the building to reduce the building footprint – improving the visual impacts further than what was included in the Response to Submissions

Updated JR drawing pack, Revision H (\*.pdf, A0 format):

The amendments to the JR design drawings included in this pack are:

- Changing the building signage branding from Woolworths to Primary Connect and adopting a similar colour scheme – resulting in nil change to visual impacts
- Adjustment of the entrances to provide 2 entry lanes at the north of the site, and one entry lane at the south of the site (previously 3 at the south) - improving internal traffic flow throughout the site and reducing unnecessary vehicles movements inside the JR site
- Inclusion of an internal recirculation lane that allows vehicles using the weighbridges to be re-directed within the site – improving internal traffic movements to be captive within the site in lieu of using the internal precinct western ring road
- Adjustment of the location of the maintenance facility from the north west corner of the site to the north east corner of the site – moving the facility further away from sensitive noise receivers

Both of these adjusted building plans have also been reflected in the updated Precinct and Master Plan DA drawing packs, Revision G (\*.pdf, A0 format).

The aforementioned drawing packs and plans lodged with this letter response.

Yours sincerely

A handwritten signature in black ink, appearing to read 'RJH', followed by a horizontal line.

Richard Johnson  
Director