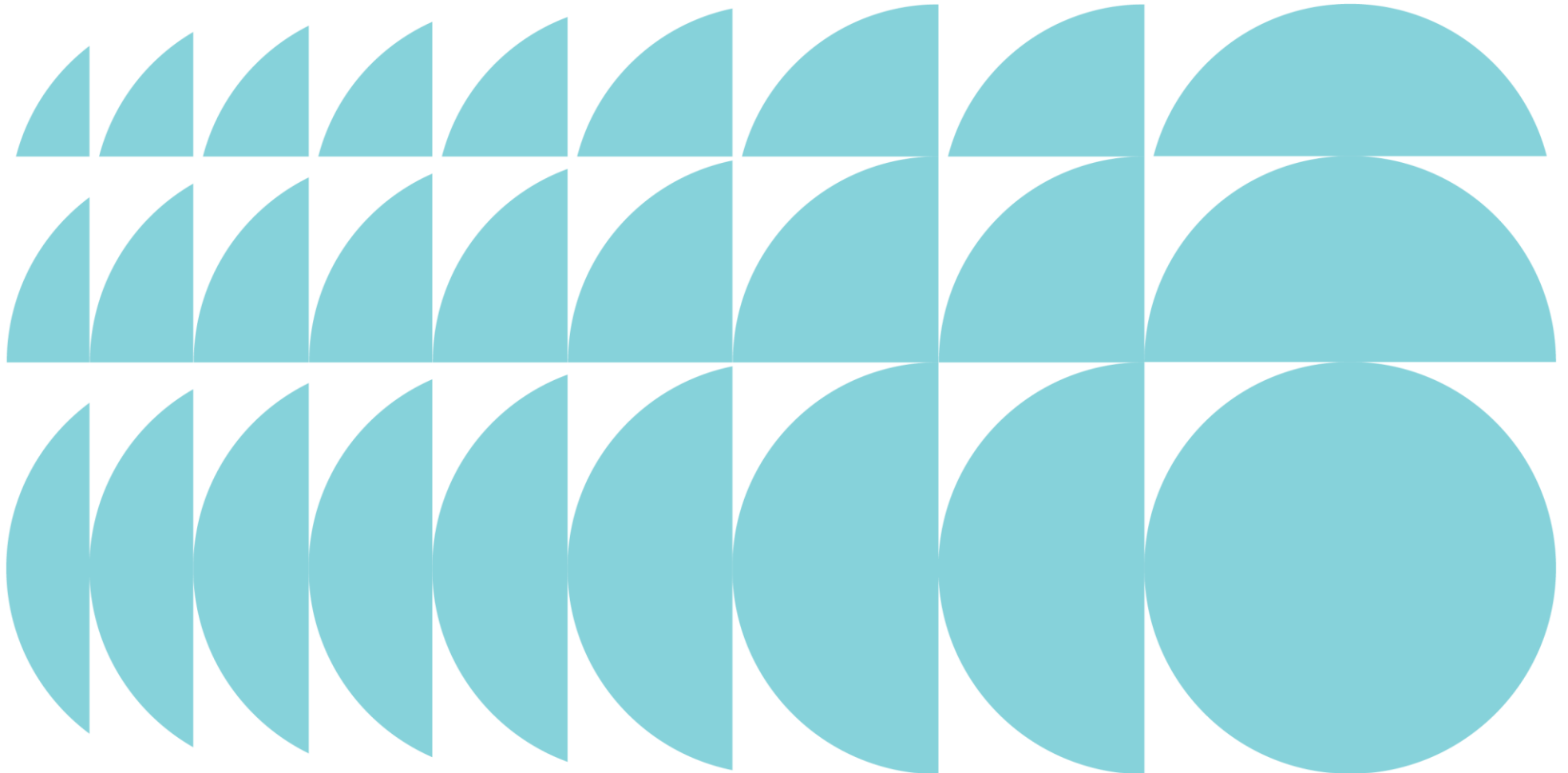


Appendix B - Summary Response to Public Submissions

Bringelly Road Business Hub
SSDA 17_8900 - Nulon Motor Oils Warehouse

Submitted to Department of Planning and
Environment
On behalf of CIP/CH (Bringelly) Pty Ltd

04 July 2018 | 17650



Appendix B. Summary Response to Public Submissions

Extracts from submissions from the general public received in relation to SSD 17_8900, and a response to each of these matters, have been summarised and outlined in the Tables below. This summary should be read in conjunction with Response to Requests for Information (RtS) the prepared by Ethos Urban dated May 2018 and additional documentation appended to the response package.

This report addresses submissions from the following individuals:

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| <ul style="list-style-type: none"> • Angelo Calcopietro of West Hoxton, NSW (243065) • Giuseppe DeLellis of 15 Kurrajong Avenue Georges Hall NSW 2198, NSW (243292) • Henry Dang of West hoxton, NSW (243057) • Javier Anrique of Bardia, NSW (244002) • Karen Calcopietro of West Hoxton, NSW (243063) • Karen Peak of Carnes Hill, NSW (243994) • Katie Morris of Carnes Hill, NSW (243055) • Rosa Zulic of west hoxton, NSW (243090) • Tracey Lynch of West Hoxton, NSW (243904) • (Name withheld) of Horningsea Park, NSW (243948) • (Name withheld) of Horningsea park, NSW (243294) • (Name withheld) of West Hoxton, NSW (243693) • (Name withheld) of West Hoxton, NSW (243632) • (Name withheld) of West Hoxton, NSW (243902) | <ul style="list-style-type: none"> • (Name withheld) of Horningsea Park, NSW (243898) • (Name withheld) of Carnes hill, NSW (243077) • (Name withheld) of West Hoxton, NSW (243131) • (Name withheld) of Campbelltown, NSW (243092) • (Name withheld) of Carnes Hill, NSW (243059) • (Name withheld) of West Hoxton, NSW (243067) • Antonietta Carabott of Prestons, NSW (244664) • Antonietta Carabott of Prestons, NSW (246017) • Mohammed El-asmar of Hinchinbrook, NSW (246031) • Mohammed Nadeem of Hoxton Park, NSW (244012) • Nafisa Khan of Hoxton Park, NSW (244010) • Shaun Padt of Edmondson Park, NSW (246045) • Tanya Parsons of Mt Colah, NSW (246035) • (Name withheld) of Campbelltown, NSW (246043) • (Name withheld) of Middleton, NSW (246029) | <ul style="list-style-type: none"> • (Name withheld) of West Hoxton, NSW (246025) • (Name withheld) of Middleton, NSW (246019) • (Name withheld) of Eagle Vale, NSW (246670) • (Name withheld) of Middleton Grange, NSW (246276) • (Name withheld) of West Hoxton, NSW (246047) • (Name withheld) of Bexley, NSW (246039) • (Name withheld) of Horningsea Park, NSW (244318) • (Name withheld) of Horningsea Park, NSW (244298) • (Name withheld) of Horningsea Park, NSW (244660) • (Name withheld) of WEST HOXTON, NSW (244322) • (Name withheld) of Horningsea park, NSW (246033) • Angela Ayoub of West Hoxton, NSW (247101) • Christopher whittaker of West Hoxton, NSW (248207) • Jim Pouliopoulos of West Hoxton, NSW (248338) | <ul style="list-style-type: none"> • Russell James Whittard of HORNINGSEA PARK, NSW (248211) • Steven Bautovich of Horningsea Park, NSW (248261) • Vira Maselli of West hoxton, NSW (247360) • (Name withheld) of Smithfield, NSW (248291) • (Name withheld) of Horningsea Park, NSW (248209) • (Name withheld) of Horningsea Park, NSW (248205) • (Name withheld) of West Hoxton, NSW (248355) • (Name withheld) of Horningsea Park, NSW (248343) • (Name withheld) of HORNINGSEA PARK, NSW (248320) • (Name withheld) of West hoxton, NSW (246727) • (Name withheld) of Leppington, NSW (246717) • (Name withheld) of west hoxton, NSW (247861) • (Name withheld) of Carnes Hill, NSW (247857) • (Name withheld) of West Hoxton, NSW (247874) | <ul style="list-style-type: none"> • (Name withheld) of West Hoxton, NSW (247872) • (Name withheld) of West Hoxton, NSW (247870) • (Name withheld) of HORNINGSEA PARK, NSW (247868) • Jon Crutcher of Austral, NSW (248861) • Maria Fabian of Horningsea Park, NSW (248854) • Maria Vuica of Horningsea Park, NSW (248865) • Samantha Vandenberg of Horningsea Park, NSW (248859) • (Name withheld) of West Hoxton, NSW (248852) • Elizabeth Tacon (received after exhibition period) • Unknown (received after exhibition period) • Unknown (received after exhibition period) • Cheryl Crisafulli (received after exhibition period) |
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Table 1 Issues Raised

Item	Key Issues Raised	Proponent Response
Land Use & Planning		
1.	- The proposed development does not meet a common sense definition of 'light industrial'. Given the health concerns raised by multiple members of the community, it is considered that the proposed use does not fit the meaning of 'light industrial'. - Is against the intended use of the land. - This type of facility needs to be: - in a heavy industrial zone; and - located away from residence.	The proposal meets the NSW statutory planning definition of a 'light industrial' use. The current version of the Standard Instrument – Principal Local Environmental Plan defines an “industrial activity” to mean: “the manufacturing, production, assembling, altering, formulating, repairing, renovating, ornamenting, finishing, cleaning, washing, dismantling, transforming, processing, recycling, adapting or servicing of, or the research and development of, any goods, substances, food, products or articles for commercial purposes, and includes any storage or transportation associated with any such activity.” The Standard Instrument defines “light industry” to mean: “a building or place used to carry out an industrial activity that does not interfere with the amenity of the neighbourhood by reason of noise, vibration, smell, fumes, smoke, vapour, steam, soot, ash, dust, waste water, waste products, grit or oil, or otherwise.” Light industrial uses are permissible with development consent on the site under the provisions of the applicable <i>State Environmental Planning Policy (Western Sydney Parklands) 2009</i>. On 13 January 2016, a delegate of the NSW Minister for Planning and Environment approved a Concept Plan on the site for a business park including a maximum of 100,000m² of light industrial gross floor area (SSD 6324). The proposed facility is consistent with the conditions of this approval, as outlined within the Environmental Impact Statement (EIS) prepared by Ethos Urban (dated 18 January 2018) that was submitted with the State Significant Development Application (SSDA). The proposed Nulon facility is consistent with the definition of a light industry for the following reasons: - The facility will store, blend, package (i.e. process) and distribute non-flammable motor oils for sale in auto retail shops. - There is no manufacturing of motor oils proposed on site. - There are no chemical reactions associated with the processes undertaken on site. - A State Environmental Planning Policy 33 - Hazardous and Offensive Development Assessment (SEPP 33 Assessment) was submitted with the EIS as Appendix F. The assessment determined that SEPP 33 which applies to high risk industrial operations is not applicable to the facility. This has been agreed in principle by the Department of Planning and Environment. - Notwithstanding the SEPP 33 assessment, a Preliminary Hazard Analysis (PHA) has been prepared as part of this RTS (Appendix D) to provide

Item	Key Issues Raised	Proponent Response
		additional clarity on potential hazards and related mitigation measures. This assessment determined that the risks at the site boundary do not exceed the acceptable risk criteria and the proposed facility would be permitted within the current land use zoning for the site. • All operations, apart from vehicle movements, will occur within the warehouse. The associated noise will be contained and below levels that would disturb the residents of nearby houses. This is further confirmed within the updated Noise Impact Assessment (Appendix E) prepared by SLR. • Any smells, fumes and vapours associated with the operations are to be contained within the warehouse and will not impact on the air quality of neighbourhoods in the surrounding area. This is further confirmed within the Air Quality Assessment (Appendix F) prepared by SLR. • Wastewater and waste products will be managed in accordance with the relevant standards to prevent any off-site contamination. The waste water is stored within an Intermediate Bulk Container (IBC) on Site until collected by a waste contractor. Refer to the updated Environmental Management Plan (Appendix L) prepared by Nulon. • There will be no smoke, flames, steam, soot, ash, dust, grit or otherwise generated by the ongoing operations of the facility. For these reasons, the proposed development is consistent with the Standard Template definition of "light industry" and, is consistent with the Concept Approval for the site.
2.	This is industry not light retail. Residents are of the impression shops and other community friendly facilities will be opened in this site.	Refer to the response to Item 1; the proposed use is defined as a light industrial use. Condition A14 of the Concept Approval permits a maximum 100,000m ² gross floor area for light industrial uses on the site.
3.	The land/ block/ area chosen has been approved for light industrial use only. NULON is attempting to build a heavy industrial site that the council approved for cafes, restaurants, park lands, shops.	Refer to Items 1 & 2 above.
4.	This development cannot be defined as light industry as claimed in NULONS submission and is against the intended use of the land. Although the definition of light industry includes the storage and warehousing of goods, the goods included within this definition surely wouldn't amount to the bulk quantity of flammable goods on the proposed NULON facility. This development has a range of issues that would impact the local community and environment which includes odour, air quality, traffic, noise and vibration from machinery and truck movement, risk of water catchment and land contamination.	Refer to Items 1 & 2 above.
5.	Light industrial means a building or place used to carry out an industrial activity that DOES NOT INTERFERE with the amenity of the neighbourhood by reason of noise, vibration, smell, fumes, smoke, vapour, steam, soot, dust, water waste, waste products, grit and oil.	Refer to Items 1 & 2 above.

Item	Key Issues Raised	Proponent Response
	This proposal is definitely NOT LIGHT INDUSTRIAL though the building may be as per the proposal (light industrial warehouse) it is what happens inside and around the facility. It has a range of issues that would impact the local community and environment which includes air quality, odour, traffic, fumes, noise, vibration from machinery and truck movement, risk to water catchment and land contamination. The proposal also claims to operate 24 hours.	
6.	By definition, the term light industry means an industry not being a hazardous or offensive industry or involving use of hazardous or offensive storage where processes, machinery and transportation does not interfere with the amenity of the neighbourhood by reason of noise, smell fumes, etc. Why do you believe Nulon's operations can be carried out in a Light Industry zone when they store, blend and produce hazardous and flammable material?	Refer to Items 1 & 2 above.
7.	This site is not recommended for Nulon as it is a manufacturing site and as such not a warehouse as stated in the general DA request yet further below they classify as manufacturing / other manufacturing. This creates a precedent for other so called light industries to come to the site which may propose further concerns and hazards in the community and needs to be reviewed.	Refer to the response for Item 2.
8.	In relation to a light business hub, why is one required this close to an existing residential area when we have places like, the crossroads in Liverpool, Eastern Creek which has industrial lots and I am sure there are a few more around the Liverpool area.	The site is one of three proposed business hubs in the Liverpool LGA portion of the Western Sydney Parklands. The site has been determined by the Department of Planning and Environment as being suitable for business uses including light industrial uses given its excellent exposure to the regional road network and its ability to assist with the creation of employment generating land uses within close proximity to existing and planned residential areas in Western Sydney. The environmental assessment has determined that the proposed facility will not generate any unreasonable impacts to nearby residents.
9.	Light industry means a building or place used to carry out an industrial activity that does not interfere with the amenity of the neighbourhood by reason of noise, vibration, smell, fumes, smoke, vapour, steam, soot, dust, waste water, waste products, grit and oil. The Bringelly Business hub is supposed to be allocated for light industrial businesses and I feel that because Nulon will be producing vast numbers of motor oil products, storing combustible products, storing vast numbers of aerosol products and a future 24/7 operational business with and movement of large tankers and trucks into and out of the communities and loading dock operations at all hours of the day and night that it should NOT be considered light industrial. Nulon's application is based on the existing facility at Moorebank in regards to amount of production and storage of products, yet Greg Simons (CEO of Nulon Products Australia) states in a newspaper article (The Liverpool Leader) that his production will be double of the existing Facility at Moorebank, therefore I feel the application should be reviewed because all the figures in the proposed development application are outside the lines of being correct. Nulon has not given a full list of: • All the hazardous materials to be used in the proposed development and the quantity of each present	Refer to the response to Item 1 regarding land use definition and environmental impacts. The Preliminary Hazard Analysis (PHA) submitted with the RTS as Appendix D outlines the proposed equipment, materials, volumes and storage arrangements. Trucks delivering combustible liquids to the site will accommodate their loads in accordance with all relevant Australian Standards and industry requirements.

Item	Key Issues Raised	Proponent Response
	- All equipment proposed for use at the proposed factory site - The mode of storage used (bulk or packages/ containers) and the maximum quantity stored or held on proposed factory site - The average number of annual and weekly road movements of hazardous material to and from the proposed facility, and the typical quantity in each load. Nulon has only given an estimate of/from the existing facility which is half the size in storage and production area. Just because a business is considered light industrial, and I am not agreeing that Nulon is light industry, doesn't mean it is safe or good for the environment and the communities healthy, it just means that it have less environmental impact than those associated with heavy industries. Light industries require only a small amount of raw materials, area and power. While light industry typically can cause little pollution, particularly when compared to heavy industries, some light industry can cause significant pollution or risk of contamination. Any business that produces or blends oils with harmful/toxic additives, stores large quantities of harmful chemicals and aerosols should not be considered as light industry	
10.	With the fine line of whether Nulon's facility is light industrial or high industrial, which no one can agree on, the community has come together with their concerns about its potential risk to the environment and the health of the residents living in the communities. These concerns should be enough to NOT have the development approved.	Refer to the response to Item 1.
11.	Actual relevant authorities need to be brought in for further clarification in addressing all concerns of the residents, for the environment, what the area was proposed for originally and what would be beneficial for the community living in this region.	All relevant authorities were consulted during the proposal's exhibition period. A detailed response to the issues they raised is provided as Appendix A .
Locational Context		
12.	- it is too close to residential - not zoned properly as it's a residential area - The proposal backs on to residential properties including a pre-school. - This is not a business that should be located in such close proximity to primary schools, child care facilities, water ways, homes and businesses.	The proposed facility is proposed to be located on land that is subject to a Concept Approval that allows up to 100,000m ² gross floor area for light industrial land uses. The environmental assessment that was undertaken and submitted with the EIS and the additional assessment undertaken as part of the RTS process has not identified any processes associated with the proposed facility that would reduce the safety or create any health risks for the surrounding residents, children attending nearby schools and child care facilities, or the environment.
13.	Allowing a oil preparation plant next to a gas main and water way is an environmental disaster waiting to happen. Please look at this area as a whole. There is high density housing, parklands, water way and gas main. Not the perfect location for such hazardous chemicals plant. Business see the main junction transport line as perfect spots without seeing what else is already survive in the surrounding areas.	Jemena, the operator of the gas pipeline have not raised any objections to the proposal. The proposal includes mitigation measures to ensure that the operations of the facility will not have any adverse impacts on the surrounding environment. These are outlined at Section 5 of the RTS report.

Item	Key Issues Raised	Proponent Response
14.	having such a plan so close to our great park land and multiple school could be very hazardous. I don't understand why we would allow an industrial plant at this location so close to housing and beautiful park land there are plenty of industrial site already they can exist on.	Refer to the response to Item 12.
15.	This is within close proximity to a zoned major town centre. You would not want this kind of development near a civic precinct or high density residential	Refer to the response to Item 12.
16.	This area is thriving on new houses being built, young families settling in therefore this kind of facility near our homes is definitely not welcome. As you are aware there are so many new residential areas that are now being developed and for the nsw government to consider this were people live is a disgrace. Who will protect our community and how will they pay for all the health issue that the community will develop.	Refer to the response to Item 12.
17.	Object to this proposal based on the dangers posed due to the location and close proximity to homes, schools and community facilities as well as the Western Sydney Regional Park and local waterways and wetlands. A quick look online or a visit to the site clearly show this location is not industrial, and is in extremely close proximity to a large number residential homes. The number residential sites surrounding this location is set to increase significantly in the near future with large land releases within 3000m to the west, north west, south and south east of the site. Future developments in high, medium and low density residential properties are already approved, and the plans for Leppington Town Centre will bring another community precinct to fruition in the near future, with educational facilities, health and medical facilities and retail space already in the planning stages. A quick search online will show you that within 3000m direct line of this site are currently 13+ schools with estimated enrolments up to 8000+ children. Some of these are newly opened schools, set to expand rapidly in enrolment numbers the future. Lying just outside 3000m are both a number of primary and high schools, with very large enrolment numbers. There are also numerous child care centres, a number of elderly care facilities and acres and acres of land still being farmed and worked by local primary producers. In the future the proposed site will be surrounded on all sides by residential properties, community and private facilities, retail and open space. The influx of workers and visitors to the area who could be at risk, is forecast to be a huge increase on current numbers. The nature of the business to be conducted at this site is too dangerous to be approved so near to these already established and populated areas, which will be even more densely populated in the near future.	Refer to the response to Item 12.
18.	There is so much land further away from residential. What other sites have been explored for this type of use? A more suitable location should be sort for the oil manufacturing company that will not directly impact the surrounding community.	The Department has requested further assessment of the option of developing an alternative site, and the key reasons the subject site was identified as suitable for the facility. Nulon have outgrown their current facility in Moorebank, with majority of their staff currently living in surrounding areas within the Liverpool LGA. As such, Nulon is

Item	Key Issues Raised	Proponent Response
		seeking to relocate to a new facility that allows for future expansion, while remaining in the locality, ensuring easy access for its staff members. Nulon has established a timeframe for this expansion and required timeframe for the new facility to be operational. Therefore, the intention is to expand and relocate the Moorebank facility to the proposed location in order to maintain its current workforce and take advantage of the Bringelly Road opportunity. The site was identified as the most suitable location for the proposed new facility, particularly due to its access to key connector roads being, Bringelly Road, Cowpasture Road and Camden Valley Way. Alternative site options that meet these criteria are limited by what is currently available on the market. It is not feasible for Nulon to relinquish this current opportunity as they need to plan the design and construction of the new facility years in advance. In addition to the above, the proposed facility is proposed to be located on land that is subject to a Concept Approval that allows up to 100,000m2 gross floor area for light industrial land uses. The environmental assessment that was undertaken and submitted with the EIS and the additional assessment undertaken as part of the RTS process has not identified any processes associated with the proposed facility that would reduce the safety or create any health risks for the surrounding residents, children attending nearby schools and child care facilities, or the environment.
19.	My family is the owner of the childcare centres on Stuart Rd West Hoxton. This proposal on this site is in very close proximity to both child care centres. Both these centres are tenanted with a private operator. This development will impact both his business and our income and value of all properties in the area. This is my families only source of income as my husband is ill and this will leave us with financial hardship if it goes ahead. This development is too close to homes and children in both centres. The safety and well being of the area should be the number 1 concern of council. Young families moved into the area to provide a fresh clean family environment to join a community not a chemical site on their doorstep. It is a bush prone area and allowing chemicals to be blended, stored or made is a recipe for disaster. The health and well being of these kids and the greater community should be the main focus.	Refer to the response to Item 12.
20.	There are many new and existing industrial sites with empty premises already. Why another propose another industrial site in a residential area? Prestons industrial are only a few kilometres away why is it not on that site?	Refer to the response to Item 8.
21.	I don't understand why this site is being considered where there is vacant land away from houses and more appropriate properly classified as "industrial".	Refer to the responses to Item 8 and Item 18.
22.	Why can't we put a business hub around the vicinity of where the airport would go. Surely there is a pocket of land that can be used for this.	Refer to the response to Item 8.

Item	Key Issues Raised	Proponent Response
23.	Why is this being built right next to residential areas. We were here first. We bought our property to move into a beautiful growing suburb. Now you want to squeeze this toxic factory around our community and children. There are plenty industrial areas where you can build this. Isn't that what an industrial area is for. Keep your poison away from our children and community and go somewhere where you won't poison people. GO TO AN INDUSTRIAL AREA AWAY FROM RESIDENTIAL. This is why it's called residential. Look at the negative impact this will have.	Refer to the responses to Item 8 and Item 12.
24.	In addition with the centrality it sends a negative message to all who pass through this major intersection, driving house prices down and making it look less inviting and more polluting. In addition international visitors who will be using major road links to and from the new airport will receive a negative impression. This is a time where our local community has a chance to shine. There are a heap of industrial sites already near by around Casula and the back of the M7 at Hoxton Park Road. Please by all means build it BUT where the industrial section is. We don't want anything other than a positive impact for the community at Carnes Hill so residents such as myself oppose the move.	Refer to the response to Item 12.
25.	This type of operation needs to be located in an appropriate heavy industrial area, sufficiently distanced from families, residential developments and local community precincts to minimise any impact on the health and welfare of local residents and local flora and fauna. Considering these points, it is my opinion that the proposed site is clearly not suitable for this type of operation, and I would strongly urge the NSW Department of Planning and Environment to reject the development of this plant at this site.	Refer to the response to Item 12.
26.	I chose to live in the area due to the grasslands, fresh air and clean environment. I was surprised and extremely concerned when I heard (through community members) that there is a proposed oil manufacturing site being built within 200 meters of houses. The area has many young families and is very close to day care centres and schools (many still unaware of the proposal).	Refer to the response to Item 12. An extensive consultation process has now been undertaken. The process is outlined in the Consultation Outcomes Report which is submitted as Appendix C.
Traffic		
27.	- potential increased industrial/commercial traffic on what are essentially residential roads - There is enough traffic congestion already and that with the road upgrades and airport to come.	The Department of Planning and Environment determined that Concept Plan for the Bringelly Road Business Hub would not have detrimental impact on the surrounding road network subject to upgrades to the Bringelly Road site access. The Assessment of Traffic and Parking Implications submitted with the EIS and the addendum letter submitted as Appendix I with the RTS demonstrate that the proposed facilities traffic generation is below the assumptions made during the assessment of the Concept Plan. Therefore, the traffic impacts of the proposed facility will be less than those originally anticipated. It is noted that the RMS have not objected to the proposal.
28.	At the current facility at Moorebank, Nulon have consent to operate between 6.30am to 10pm Monday to Friday with a maximum of only 32 staff allowed on the site at any given time. The minimum number of off-street car spaces required to be provided is 48 with 1 for disabled drivers	The Assessment of Traffic and Parking Implications submitted with the EIS demonstrates that the proposed number of parking spaces is consistent with the requirements of the Concept Approval.

Item	Key Issues Raised	Proponent Response
	only. At the proposed site in Horningsea Park, they are only providing 70 visitor and staff parking. Nulon proposes to accommodate for future jobs growth of 110. Where do they propose to have all the staff parking if there is not adequate parking facilities onsite?	
29.	After speaking to the transport representative the question was raised on how many trucks will be in use for the whole site not only Nulon and it was discovered that working on a ten hour shift per day that the estimate used was for 400 trucks to be on the roads. This has a flaw in as it did not take into account other adjacent roads being Camden Valley way Cowpasture road etc, they only used Bringelly road as the study and only within the site and immediate intersection, unfortunately this does not take into account all the new estates (Willowdale, Edmondson park Oran park to name a few) and other business hubs to be developed as well as the Badgerys creek infrastructure that will feed into this system. Not allowing for the employees who will be working on the sites of the Bringelly business hub this will create an already overload within the area especially if people are trying to access the M5 and M7 and general roads in the area. We have a large number of schools and pre schools in the area and the traffic is unable to cater for the existing infrastructure and now the proposal is to increase this significantly. Additionally Stuart road which runs on the back of the proposed site is for local use and emergency services unfortunately this will be used for employees on the site to get quicker access to there workplace and probably parking as in the case of Nulon it only has 70 car spaces and it what's to increase to 100 therefore causing a parking problem.	Refer to the responses to Item 27 and Item 28.
30.	Nulon needs to find somewhere else to put their motor oil facility. It is the absolute height of negligence to even consider such a facility being allowed so close to residential areas. I and my entire family will not feel safe and neither will any other resident. No amount of reassurance Nulon will alleviate the knowledge that this facility will be safe. Perhaps the CEO would kindly consider having it next door. Please consider moving to an industrial area, where there is likely to be minimal Impact	Refer to the responses to Item 8 and Item 12.
31.	The risk of a heavy vehicle incident involving oil is very real, many incidents have occurred due to driver error and resulted in trucks: jack knifing, rolling over, running straight through RED lights due to the sloshing effect of the liquid product/ brake to hard inertia/ velocity takes over/ brakes will not stop the vehicle and the truck continues along its trajectory. Not to mention the uncoupling of trailers due to drivers not confirming the correct engagement of the trailers king pin within the locking mechanism.	The potential for incidents resulting from driver error are not a matter for consideration.
32.	I believe the site will add substantially to the increasing traffic and noise of the residential area due to increased frequency of transport vehicles which will operate at various times of the day and night.	The Review of Acoustic Impacts submitted with the RTS with Appendix E states that: “The loading dock is noted as facing west and away from the nearest receivers”, and that “noise from the operation of the loading dock would typically be limited to

Item	Key Issues Raised	Proponent Response
		the arrival and departure of trucks, which could happen during the daytime and night-time (ie 6 am to 7 am)." "Light and heavy vehicles associated with the facility would access the site directly from Bringelly Road. Given the high existing volumes on this route, the potential noise impacts from additional traffic generated by the development is considered negligible." "With regard to potential night-time impacts, it is also noted that if deliveries happen in this period, it would likely only be a single truck on any one day and the speed of the vehicle would be very low (around 10 km/h)." In addition, the traffic generated by the proposal is less than the level of traffic considered acceptable by the Department of Planning and Environment for the Concept Approval.
33.	Camden valley road is already in grid lock and I don't know how it will support the additional flow of trucks to and from the site adding to the air and noise pollution to the area.	Refer to the response to Item 27.
34.	The traffic will end up a nightmare if a business hub is put in this location	Refer to the response to Item 27.
35.	In Nulon's Development Application the proposed operation hours are: • Goods handling 24 hours on all days of the week. Nulon's loading docks traffic and noise level prediction for trucks and tanker deliveries, with air brakes and reversing alarms, will be 24/7 of incoming and outgoing traffic, which local residents will definitely hear during the night, especially the resident that lives on the adjoining land that is less than 100 meters from the proposed development. Traffic congestion and environmental impacts will be ever present with the facility's 24 hour operation along with heavy vehicles commuting in and out of the factory constantly.	Refer to the Response to Item 32.
Hazards and Risks		
36.	• The potential detrimental environmental impact especially in the event of accidents/spills • Dangerous to the environment and families in the areas. I don't want my family exposed to such dangerous chemicals.	The RTS includes a Preliminary Hazard Analysis (Appendix D) and an Updated Air Quality Impact Assessment (Appendix F). As outlined as Section 3.5 of the RTS report, the PHA determined that: "the facility would operate well below the acceptable risk criteria at the site boundary, that no incidents would result in elevated radiant heat contours extending over the site boundary; that there is zero potential for incident propagation to occur, and there are currently no cumulative effects within the precinct. The PHA additionally demonstrates compliance of the site with the relevant codes, standards and regulations."

Item	Key Issues Raised	Proponent Response
		As outlined at Section 3.6 of the RTS report, the Air Quality Assessment noted that: “a carbon filtration ventilator will be connected to all blending tanks. This will ensure that any odorous emissions from the blending tanks will be appropriately filtered prior to release into the atmosphere. As the oils are never exposed or handled in an open container, fugitive emissions are minimal, and the air quality within the warehouse is not affected by emissions or odours. It is therefore not necessary to filter the air within the ambient space of the warehouse prior to its release to the atmosphere, and no restrictions on the release of this air is proposed.”
37.	This proposal is a major environmental concern for the area with the possibility of industrial accidents with possible blast zones and air pollution.	Refer to the response to Item 36.
38.	Hazardous materials need to be contained within heavy industrial zones not residential and park/wetlands. Please consider the local residents.	Refer to the responses to Item 1, Item 12 and Item 36.
39.	The danger to the community and the environment (Western Sydney Parklands) cannot be ignored.	Refer to the responses to Item 12 and Item 36.
40.	There is a very real daily threat to our local families/ schools/ day care centres of a major incident occurring due to mechanical failure or human error. The impact would be catastrophic to the immediate area/s depending on the severity of the incident (explosion/ fire etc...)	Refer to the responses to Item 12 and Item 36.
41.	There is an immediate threat to the surrounding environment/ community/ residents should there be a major/ spill due to on site tank rupture due to fire incident occurred in or around or local community.	Refer to the response to Item 36.
42.	I feel that in the removal of waste products by other companies that the traffic volume will be higher than stated in the development application and the risk of contamination from the product they are removing also a potential risk.	The frequency of waste removal vehicles is between once a week to once a fortnight. The proposed frequency will have a negligible impact on the operation of the road network. The Waste Management Plan submitted with the EIS and the Waste Classification Report submitted as Appendix G with the RTS outline how the waste will be managed to avoid the risk of contamination.
43.	The manufacturing and bulk storage of over 1000000L of combustible liquid, 35000L of aerosols, hydrochloric acid and other hazardous chemical liquids that are a very real serious risk to our health and environment. These figures are based on the Moorebank plant yet the proposed development will be twice that size and the amount of chemicals would increase greatly.	Refer to the response to Item 36.
44.	Safety management systems, processes and procedures in place can be diverted from as previously on the Moorebank site. Human factors such as fatigue, repetition that breeds	Nulon have implemented to new systems at their Moorebank facility. These include: Automated blending tanks are electronically automated;

Item	Key Issues Raised	Proponent Response
	complacency, insufficient training, operational pressures, alcohol, drugs (prescribed and recreational) or even sabotage.	- Electronic alarm systems will operate if a tank is left on longer than intended; - Automatic shutdown will occur if the temperature within the tank exceeds the pre-set threshold; and - The electronically operated blending process prevents the heating elements working without the stirring mechanism operating. - In addition to these measures, a carbon filtration ventilator will be connected to all blending tanks. This will ensure that any odorous emissions from the blending tanks will be appropriately filtered prior to release into the atmosphere. These measures will ensure that every practical measure is undertaken to prevent incidents occurring on site. This is discussed further at Section 3.6.1 of the RTS report.
45.	Mechanically engineered safety systems are maintained by humans and as such can also be susceptible to procedural failures. In 2016 the EPA recorded an incident that occurred at Nulon Moorebank facility where an oil blending machine was left operating unattended overnight. From that incident 48 community members complained of vomiting, migraines and nausea as a result of exposure to offensive fumes. I will not have my family living with the daily fear of a minor or major incident. There is no price on my families health and wellbeing. I recognise that NULON is a reputable Australian Owned Company but I think there is a more appropriate area that is more conducive to their operational requirements.	Refer to the responses to Item 44, Item 8 and Item 12.
46.	The proposed facility will be storing dangerous goods and will also be blending and bottling and packaging goods such as hydrochloric acid, combustible liquids and aerosols. The blending of bulk goods is inconsistent with the common sense idea of light industry. Finally, there is the environmental and safety concerns of storing solvents and blending materials. Air quality will be affected for example when venting occurs and vapours containing VOC's are emitted from the tanks. There is also the real risk of spills and failure of equipment which could cause a safety hazard to local residents.	Refer to the responses to Item 1, Item 12 and Item 36.
47.	We don't want even the slightest possibility (no matter how low the probability) of any issues here.	Refer to the response to Item 36.
48.	We have been advised that an independent SEPP 33 assessment has been requested by the Department of Planning. I have been informed that the same company who carried out the first SEPP 33 Assessment will be carrying out the second one. How can this be done fairly and without bias? Will the Department of Planning have an independent assessor looking at this?	Noted.
49.	SEPP 33 Assessment by Blackie Mendhams. Part 3.2.1 States that '25% of an aerosol can is propellant (LPG); hence, only this component of the aerosol has been considered for assessment against SEPP 33'. How can this be when the LPG is part of the whole aerosol can?	The SEPP 33 Assessment submitted with the EIS has been accepted by the Department of Planning and Environment.
50.	In the document created by the NSW Planning department titled Applying SEPP 33, it states that Industries that may fall within SEPP 33 and may be potentially hazardous include oil processing and chemical industries. How can Nulon not fall within these categories?	The SEPP 33 Assessment submitted with the EIS concluded that the quantities of dangerous goods to be stored at proposed facility did not meet the threshold quantities that require the application of SEPP 33.

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51.	This proposal is for manufacturing of oil, including blending of motor oil and fuel injectors, coolant and octane booster. Some of these chemicals used in the manufacturing of Nulon's products are carcinogenic and can cause birth defects. If this is not a hazardous industry, why must the staff at Nulon wear protective clothing including, gloves, coveralls, masks and safety glasses?	The SEPP 33 Assessment submitted with the EIS has been accepted by the Department of Planning and Environment.
52.	Nulon have been operating for close to 18 months without having BCA Fire Compliance as confirmed by the Risk Engineer at the Community Consultation meeting. This is not acceptable for the community nor the employees. How can they be allowed to continue blending without the correct fire systems in place?	The proposed facility will operate in accordance with all relevant Australian Standards and industry codes.
53.	I am extremely concerned about the short term and long term health risks (associated with fumes and odours), and the risk of fire and explosions and the impacts to my family, friends and neighbours. There is significant evidence associated with the health risks surrounding oil manufacturing along with inhaling of fumes on a daily basis and risks of explosion. An example of the risk was made evident when the Nulon plant in Moorebank a heater was accidentally left on for several hours which sadly resulted in 35 reported neighbouring residence being sick or hospitalised. The company was fined.	Refer to the response to Item 36.
54.	How will spillage be eliminated when unloading oils?	Section 3.3.5 of the RTS report discusses incident response procedures. It states that: "The PHA provided at Appendix D identifies that the site has been designed to contain spills from operations within individual bunded areas or in tertiary containment within the site boundaries via the stormwater system. Therefore, in the event of an incident, spills will be contained and prevented from entering the public water course. As such, an offsite incident is unlikely to occur. However, the PHA specifies that spill kits should be located around operational areas to ensure a quick clean up response can be undertaken to contain a spill. Nulon will provide spill kits in accordance with the PHA recommendation. In addition to the use of spill kits to manage an on-site incident, the facility will be designed and operated to prevent and contain incidents to prevent off-site impacts, including: • Dangerous goods containers will be stored on a pallet bund and will be located within a suitably bunded area. • A storm water isolation point will be incorporated into the design. The penstock shall automatically isolate the storm water system upon detection of a fire (smoke or sprinkler activation) to prevent potentially contaminated liquids from entering the water course. • The site shall be designed to contain any spills or contaminated water from a fire incident within the boundaries of the site. An updated Environmental Management Plan has been prepared by CIP and is included at Appendix L. This report outlines additional environmental management measures in response to submissions received.

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55.	I have been working in the paint industry over 20 years, i know how dangerous these chemicals are. Now must stop work because people got sick from the chemical, can't breath properly, always feels short of breath. Please do not let them build the factory.	Refer to the response for Item 36.
56.	Nulon consistently guarantees that the facility is absolutely safe, that it poses no health risk to neighbours and the community. Nulon's past history of numerous incidents with the Moorebank community shows that this guarantee is not reliable. No one or company can also guarantee that there will not be Chemical & Oil spills and leaks or Contamination in or around a facility. Nulon cannot guarantee that human error, machine malfunction, weather or local fires will not cause a disaster at his facility, and any of these could be catastrophic to the community. Nulon has also stated that they will be taking away the human element as if Machine and technology run by themselves and are more reliable. It's not a matter of <i>if</i> an incident will happen but <i>when</i> an incident will happen, which will impact the surrounding community, future communities and parklands as well as residents living on fear of that day.	Refer to the responses to Item 36, Item 44 and Item 54.
57.	The manufacturing and bulk storage of over 1000000L of combustible liquid, 35,000L of aerosols, hydrochloric acid and other hazardous chemical liquids are a very real serious risk to our health and environment. Although the NULON CEO states in a letter dated 12th February 2018 that "this facility will be absolutely safe" no one can see into the future. I highly supports jobs in western Sydney as I have three young teenagers of my own and I recognise NULON as a reputable Australian owned company but the needs of the company surely cannot outweigh the risk to residents heath and specifically their future SAFETY, every one of us have a right to live without the fear of health risks that the NULONv facility would pose. My back yard is not the ideal place for this facility: FIND SOME WERE THAT WILL NOT IMPACT SO MANY FAMILIES an area zoned as heavy industrial, our kids are our future NULON is not. Let common scenes prevail, Bad things happen when good people do nothing.	Refer to the responses to Item 1, Item 8, Item 12 and Item 36.
58.	The manufacturing and bulk storage of combustible liquids, aerosol and hydrochloric acid is a very serious risk to our health and environment and should not be in our backyards. Mechanical failure and human error does occur and this would be very dangerous should machinery fail or safety procedures not be followed. Nobody can assure that the site would be safe. Incidents do happen and I don't want it near my home.	Refer to the responses to Item 36, Item 44 and Item 54.
59.	i wish to object to this project as it is not in the best interests of the community on the grounds of storage of hazardous material used in manufacturing and does not fall in the guidelines of the western Sydney Parklands Trust 2020 plan and the State Governments own commercial and industrial code relating to light industry, this is a very broad meaning and because this is so close to housing and two pre schools it will pose noise, traffic, smells and a fire hazard. And although Nulon has water tanks for fire this is not suitable to put out chemical fires and the nearby fire station is not set up for industrial fires. this will also establish other similar companies to come it and make it even more hazardous. the intent is for shops storage facilities warehousing which is more in line with the proposed development. also Nulon has in the past been subject to EPA fines and the council has had	Refer to the responses to Item 1, Item 12, Item 36, Item 44 and Item 54.

Item	Key Issues Raised	Proponent Response
	numerous complaints in the current Moorebank are which is nominated as heavy industry so this approval for Nulon should be rejected.	
60.	The hazardous products stored, mixed, refined, transported are carcinogenic (cancer causing) and can be directly related to the development of tumours, rashes, lung and respiratory issues/ complications/ when exposed either directly or indirectly. This is an area that houses many young families and growing children and as such puts people's health and welfare at risk both in the short term and long term. Despite safety procedures and processes in place, there is also the risk of human error or even electronic/mechanic malfunction which can lead to serious consequences given the site's proximity to residents. This is clearly demonstrated by a previous incident that occurred at the Moorebank factory where an oil mixing/ blending machine was left running until the fire brigade were alerted via an electronic direct alarm. When they attended they found that the blending machine had been left on unattended. If that alarm had failed (mechanical failure) the result could have been much worse. 48 people in the area suffered chemical exposure symptoms such as nausea, vomiting, head ache/ migraines/ sores and rashes as a result.	Refer to Item 36, Item 44 and Item 54.
61.	If this facility was in place and another such event was to unfold the high risk of air bourn particulate igniting combustibles is absolute, oil is flammable this is a fact, the other fact is the bulk quantity of aerosols, just these two materials given the right set of contributing factors would be catastrophic. Factors such as radiant heat, fumes from the ignition of flammable goods and the fire itself would pose an imminent risk to residents lives, all air borne particulates and fires themselves are unpredictable in their nature. The CEO states he has bunding, does this allow for rupture due to puncture taking into account the spray effect of the incumbent combustible, spill and splash especially if on fire?	Refer to Item 36, Item 44 and Item 54.
62.	Safety management systems, Processes and procedures can be diverted from/ due to fatigue, poor training, poor operational culture (meeting deadlines/ company expectations), alcohol, drugs, repetition (breeds complacency/ laziness/ take short cuts) these would be classed as an example of human error. All mechanically engineered safety systems are maintained by humans and as such can also be susceptible to procedural failures that have led to many major incidents around the world involving these same products which were directly attributed to mechanical failure due to human error. In 2016 the EPA recorded a previous incident that occurred at NULONS Moorebank facility where an oil blending machine was left operating unattended from 12am until 5am. Within that time 33 complaints were made to fire and rescue and the NSW EPA environment line regarding the strong smell of offensive fumes. In addition fifteen people from neighbouring factories went home sick complaining of headaches, vomiting and nausea, as a result of this incident occurring 48 people in total suffered from symptoms of exposure to offensive fumes. We will not live with the daily fear of a minor, major or any incident ever occurring within our immediate community, there is no price that can be put on our families lives/ health and future	Refer to Item 36, Item 44 and Item 54.

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	wellbeing. This is a gamble I will not take with my families health or future within my current community.	
63.	I am concerned about the potential contamination to the environment that may accumulate over time. The proposal states that the site will be utilised for processing/re-processing of petroleum products which often contain synthetic compounds which are carcinogenic. Furthermore, the proposal states that there cannot be 100% containment of outgassing of contaminants. Even if containment was estimated to be 99.5%, there is no description of the volume. ie.0.5% release of toxic potentially carcinogenic compounds in what volume? How many parts per million? Also over what duration will this occur, such as in a continuous process? This is critically important, as cancers due to such harmful environmental effects often have a delayed manifestation in the general community and is extremely difficult to quantify without the appropriate regulatory bodies.	Refer to the response to Item 36 and Item 64.
64.	I am appalled, and so is the community, that anyone would consider this type of development application so close to residents, child care centres, schools and within the Western Sydney Parklands, 10 meters from Bedwell Park wetlands, considering how harmful and dangerous these products are. The extent of the protective clothing that employees have to wear, when handle and manufacturing these products, should be an indication that this motor oil manufacturing company is not light industrial. Also please take into consideration how Nulon went about proposing the application by not consulting the community and downsizing the extent of what they wanted to develop in the community. Where is the communities and environments protection from the manufacturing process of these products? How can so many residents be ignored when they are thinking about their health, safety and the environment. It's not like only 10 or 100 residents are opposing this development, but 1000's of residents in the local community are opposing the Nulon's development within BRBH and the Western Sydney Parklands. Some of these products, as categorised by Chemwatch, are suspected of causing cancer, may cause genetic defects, suspected of damaging fertility or the unborn child, causes damage to organs and this list goes on. These products are harmful to aquatic life with long lasting effects which is a real concern to me, considering the development is 10 meters from Bedwell Park Wetlands so not only dangerous to the aquatic life but also the birds and animals that eat that aquatic life. I remember when they use to say "smoking MAY cause cancer" and now apparently it does. What do we, the community, have to do to have our concerns heard; it seems we can't be more forthright about these/our concerns when we opposed the development application. I hope you consider the information in this email and the future and health of Horningsea Park, Greenway Park (West Hoxton), the surrounding communities residents and the wetlands environment, when you are assessing and making a determination on Nulon's proposed development application.	The SEPP 33 Assessment submitted with the EIS concluded that the quantities of dangerous goods to be stored at proposed facility did not exceed the threshold levels of SEPP 33. Subsequently, the facility was determined to be only "potentially hazardous" and therefore no additional risk assessment studies would be required. Notwithstanding this, additional risk assessment was conducted in the form of a Preliminary Hazard Analysis (PHA) (provided in Appendix D) to assess the risk profile of the site on the surrounding land uses. This assessment concluded the risk profile of the site on the surrounding land uses was well below the permissible criteria as detailed in the Hazardous Industry Planning Advisory Paper (HIPAP) No. 4. This assessment confirmed the findings of the SEPP 33, identifying the facility is only considered as "Potentially Hazardous". Section 3.5 of the RTS report summarises the findings of the PHA as follows: "the facility would operate well below the acceptable risk criteria at the site boundary, that no incidents would result in elevated radiant heat contours extending over the site boundary; that there is zero potential for incident propagation to occur, and there are currently no cumulative effects within the precinct. The PHA additionally demonstrates compliance of the site with the relevant codes, standards and regulations." The classifications of chemicals made within a Safety Data Sheets (SDS) are made specifically in the context of a workplace scenario where workers might be exposed to higher than usual amounts of chemicals as opposed to domestic use of the same chemicals. However it is the risk and not the hazards that a chemical poses which is the important factor to consider when evaluating the effects to human health or that of the environment. As long as the controls put in place to mitigate or remove exposure to chemicals are in place then the intrinsic hazards of a chemical become significantly less relevant. Proper exposure controls can eliminate or severely minimise the risk of exposure to hazardous chemicals and is seen as the main factor in assessing the potential adverse effects of a chemical to humans and the environment and not the hazards posed by the chemicals themselves.

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		In reviewing the objection raised regarding the risk profile of commodities stored as part of Nulon's operations, the main risks result from contamination of the material into surrounding waterways. As noted in the PHA, the risk of a spill is considered low and the potential for spills to impact external to the site are mitigated by the presence of spill kits, bunding and site drainage system to a single point which can be isolated prior to discharge from the site. Therefore, the concerns raised by the objectors are unlikely to have any offsite impact. Refer to further responses to Item 36 and Item 54.
Community Consultation		
65.	Unfortunately the Department has not sought to consult the affected community to an appropriate extent. A number of concerned residents in the suburbs surrounding the proposal have not received letters notifying them of this state significant project which is to be located in their neighbourhood. This is considered unacceptable and appears to intentionally limit the involvement of the community. In order to rectify this, I request that the public exhibition period be extended and the project be notified to all residents within a 5km radius. This would better allow for the concerns of the community to be gathered and considered in accordance with the Environmental Planning and Assessment Act.	The Department instructed Nulon to undertake further consultation. Straight Talk was engaged to implement a strategy to inform local residents, landowners, businesses and key agencies about the proposal. This has not only ensured that the community have a clearer understanding of the proposal, but has also provided an important mechanism to gather feedback. As part of this strategy, further community consultation has been undertaken, as follows: • Two drop-in sessions, one on Saturday 14 April 2018 and the other on Sunday 15 April 2018 were held. • Advertisements placed in the Liverpool Leader and Champion newspapers during the weeks commencing the 2 April and 9 April 2018. • Letterbox drop to approximately 10,000 homes within the vicinity of the proposal. • Advice of the sessions posted to the Facebook group. Nulon has also presented the proposal to Liverpool City Council (meeting of Wednesday 28 February 2018), and has extended the offer to all stakeholders to inspect the existing Moorebank facility to enable them to better understand the nature of the proposed development. On 24 April 2018 the Department and two representatives of Liverpool Council attended the Nulon facility at Moorebank and undertook a detailed tour of the premises and activities. A Consultation Outcomes Report has been prepared by Straight Talk and is included at Appendix C. No additional issues were identified during the additional consultation activities. All the issues raised during additional consultation activities had already been identified in submissions and are addressed as part of this RTS Report.
66.	The local Councils Liverpool and Camden should also be provided the opportunity to provide comment and represent their community. I am unaware that Camden has been notified of this development which may have an impact on their planned communities.	Camden Council was appropriately notified, to which they provided a response to the development application during the exhibition period. In their response Camden Council confirmed they have no objections to the proposed development.

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67.	I note the lack of community consultation by NULON. We were never informed and didn't know, until now and found out second hand.	Refer to the response to Item 65.
68.	The risk this development would pose of a major incident occurring due to mechanical failure or human error, would be a very real daily threat to local families, schools, child care centres, community facilities and local flora and fauna. Depending on the severity of an incident such as a chemical spill, explosion, fire, gas leak or other disaster, the impact would be catastrophic to the immediate areas. Incidents will happen, and have happened at the Moorebank site operated by this company. This company has previously been fined for breaches resulting in emissions of toxic fumes from the Moorebank factory. I am deeply concerned with the risks associated with this type of operation and strongly opposed to having such a hazardous operation located within our community. The hazardous products to be stored, mixed, refined and transported are carcinogenic and can be directly related to the development of tumours, rashes, lung and repository complications due to both direct and indirect exposure. The detrimental effect of fumes from the plant to the very young, frail, elderly and chronically ill pose a real and genuine threat - keeping in mind there are numerous child care centres, schools and elderly facilities within 3000m of this site, with two child care facilities within 500m direct line from the site.	Refer to the responses to Item 12, Item 36, Item 44 and Item 54.
69.	How this proposal of this area was managed – The last I knew about this area it was aside for the South west Sydney parklands and I know a lot of my friends in the community were excited that it may end up being a great area for families like, Lizard Log, plough and Harrow and the Dairy. As good as these parks are they are not in walking distance for our community. Everyone I have spoken to did not know about the business hub light industrial proposal that was going to be placed there so obviously it was not communicated to the community that well.	Refer to the responses to Item 8 and Item 12.
70.	How much of a study was done on the area and the families living here. You have a local shopping centre that everyone goes to. As you can appreciate most people do not work locally but we would shop locally. There could have been an information centre placed in the shopping centre over a couple of days to get the communities feedback on what they would like in the areas and maybe this decision would not be under so much community anger now.	Refer to the response to Item 65.
71.	Also all residents should be notified within Carnes Hill, Horningsea Park, West Hoxton regions in writing to be made aware of this proposal and to be also given a chance to voice there opinion on this matter.	Refer to the response to Item 65.
72.	I am disgusted to think that the community was not informed about this or the health risks associated. Isn't it the responsibly of our government to tell us and i would hope that if our council has said no to this, that the government will listen to what our community wants and that is to say no.	Refer to the response to Item 65.
73.	99% of local residents were not notified about the proposed development. The way in which this proposal was put forward seems very unethical (Charter Hall was employed by Nulon to find a location and put forward the proposal). Local communities have in no way been adequately notified about such a Large Heavy Industrial Facility being build in our backyard.	Refer to the response to Item 65 and Item 1.

Item	Key Issues Raised	Proponent Response
74.	Also no notification or consultation has been provided to the immediate surrounding area of the business park being set aside by the State Government for the land to be used for industrial instead of its intended use as open space parklands to be used by the community.	Refer to the response to Item 65.
75.	Why were we not informed when this was being discussed. No letters from council. NOTHING!!! To find out from a Facebook is disgusting and only proves this is dodgy.	Refer to the response to Item 65.
76.	I oppose this Development because of the lack of community consultation by NULON. I found out about this application approximately 7 Feb, up until this date 26/2/2020, the only mail I have received regarding this Development was a letter from MP Anne Stanley dated 14/2/2020, I have joined a Facebook group to be kept informed. Sufficient information has not been provided to the community by Nulon or CIP Constructions (NSW) Pty Ltd in regards to the development and any potential impacts. They have not undertaken a genuine community consultation and engagement process during the preparation of the EIS. All information gathered about the proposed development has been gathered online through websites, by the community. A letter was posted on Greg Simons personal Facebook page which didn't state much that was helpful in alleviating the communities concerns. The letter just stated that the development would be beneficial to his existing employees and it would not affect the community due to the factories safeguard's, but nothing about what the proposed safeguard are. Being a resident and land owner in Greenway Park Estate/West Hoxton community, for over 20 years, I feel that the community should have a voice in what is developed in this area. I also feel that a factory development of this magnitude and type in the Bringelly Business Hub location will affect the communities and the resident's quality of life, due to the possibility of environmental contamination and fear that this type of factory will enhance existing health issues and create new health problems to members of the community.	Refer to the responses to Item 65, Item 12 and Item 36.
77.	I am disappointed with the lack of information provided first hand to the local residents regarding this proposed development. My home is less than 2000m direct line from the site. No direct notification was received at my property regarding this proposal.	Refer to the response to Item 65.
Noise		
78.	Noise and vibration from the machinery and truck movements add to the noise pollution.	An Updated Noise Impact Assessment is submitted as Appendix E . In summary, the proposed facility and its associated operations will generally comply with the relevant noise level criteria and the acoustic amenity of the nearby houses will largely not be negatively impacted by the proposal.
79.	Point 6.6 Noise and Vibration in the EIS assessed the noise elements including truck movements along Bringelly Road. It makes no mention of truck movements along Cowpasture Road or Camden Valley Way. We have been told that one of the factors in relocating to this is the proximity to the M5 and M7. Without travelling along Cowpasture Road or Camden Valley Way, the trucks have no access to either of these motorways. Why was a noise and traffic impact assessment not done for the residents along these 2 roads?	The truck movements associated with the proposal are less than those assumed during the assessment of the Concept Approval. The additional truck movements along these roads will be negligible and have a negligible if any impact on noise generation.

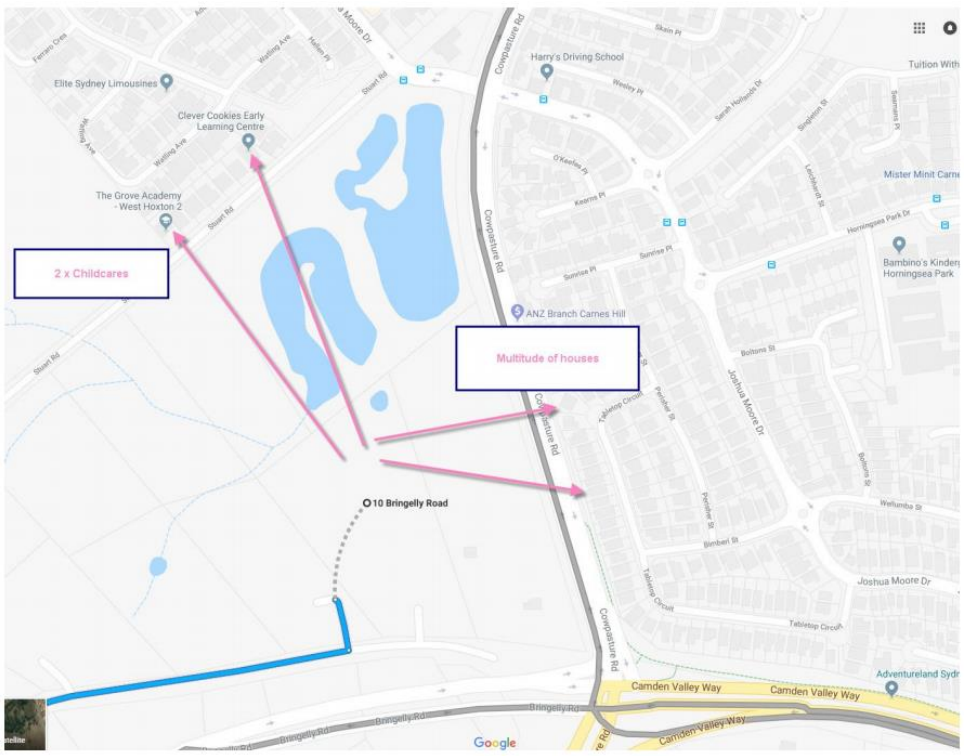
Item	Key Issues Raised	Proponent Response
80.	Noise and Vibration in the EIS also states that no significant detrimental impact to residents from loading operations will be created, however we note that one of the access points for trucks is via the eastern side of the site. This will impact on the current resident adjoining the site and any future residential development. How can Nulon ensure there are no significant impact to the adjoining resident?	Refer to the response to Item 32.
81.	I object because the proposed hours of operations are "goods handling 24 hours on all days of the week" which will include delivery and dispatch of goods involving vehicles and trucks. The noise at night time generated by the arrival and departure of vehicles along with reversing alarms will impact on my residential property. My property is highlighted in the applications Noise Impact Assessment as a "Residential Receiver" and affected property. Impact on my residence from the applicants night time operations will include sleep disturbance and awakenings and will affect health and wellbeing. The proposed developments hours of operation and use of noise generating heavy vehicles 24 hours per day means that it does not fit the criteria for light industry because light industry should not interfere with the comfort and convenience of local residents.	Refer to the response to Item 32.
Protecting the Parklands, Flora and Fauna		
82.	Western Sydney Parklands have stated that the Bringelly Business Hub will be beneficial to the surrounding community. "The parklands have been described as the 'lungs of Western Sydney' and are essential as recreational and environmental spaces. • Mr Roberts (Minister for Planning) referred to the park as "a gift from this generation to future generations" • Mr Ayres (Minister for Western Sydney) has called the parklands "the breathing lung of western Sydney". • NSW Premier Gladys Berejiklian has also said the 5280ha Western Sydney Parklands was the largest urban park in Australia and "an important resource for all of Sydney". "Western Sydney isn't just a great place to live and work, it's also a great place for families to enjoy themselves and to play," she said. If these quotes are true and to be taken seriously than why would anyone want a factory right at the end of such a busy section of the Parklands, with vastly growing communities near precinct 16 of the parklands. Why should this parcel of land be treated any different than the rest of the parklands and how can it be considered as low recreational and ecological value, when the parkland supports native life forms of fauna and flora. Develop there to make it a high recreational area for the community and you would have more people visiting and using this land, far more than a factory would. We need more parks in the community to support the growth of population in this area. The Western Sydney Parklands Visions and Principles, stated in their Design Manual and Plan of Management 2020, now looks like a fiction novel. This can be resolved by developing something that the whole community and surrounding community can use, should not this area represent	Refer to the response to Item 8.

Item	Key Issues Raised	Proponent Response
	how beautiful our parklands are, a place where people can meet and appreciate the environment and their community.	
83.	This part of our area was designated part of our Western Sydney Parklands and should not have such a large industrial facility that will have such an impact on residents and wildlife alike. Close proximity to employees residents is not a legitimate reason to have this facility located so close to residents. I myself live 50kms from my place of business as so many other locals. West Hoxton/Carnes Hill was recently named the best place in Australia for families to live with a report on the news and now this proposal is likely to jeopardise that standing. This facility cannot go ahead.	Refer to the responses to Item 8 and Item 12.
84.	The Greater Sydney Commission has said the adjoining Western Sydney Parklands are the green lungs of our community and would be threatened by this proposed development. Surely this type of development would be better suited to an industrial area, possibly in the newly created industrial area near the Western Sydney Airport where the risks on so many residents can be avoided.	Refer to the responses to Item 8 and Item 12.
85.	I live within the residential precinct with my wife and two young and growing children. I am deeply concerned about the rezoning of pristine parkland (the lungs of Sydney) for the use of processing toxic chemicals and waste products.	Refer to the responses to Item1, Item 8, Item 12 and Item 36.
86.	Plus this will leave us with even less nature strip and trees	The removal of trees was approved by the Department of Planning and Environment as part of the Concept Approval.
87.	This is highly inappropriate to have so close to housing and parkland. Who would want this near their homes? Not a pleasing backdrop to the lake behind it.	Refer to responses to Item 8 and Item 12.
88.	The parklands are an essential reason to me residing in this currently 'peaceful' area. The increased pollution is also one of my reasonings for being strongly against this proposal.	Refer to the response to Item 36.
89.	The project has a range of potential impacts on the local community and environment which include bushfire risk, contamination risk, water contamination risk to the heritage listed Sydney Water Channel and potential conflict with the Jemena Gas main.	Refer to the responses to Item 36, Item 34 and Item 13. The Office of Environment and Heritage have raised no issues with proposal's impact on the Sydney Water Channel.
90.	In relation to the plan of management 2030 draft, of western Sydney parklands shows the potential of a tourism hub and a sport and active recreation hub. Why would you put any business hub in the same vicinity as a tourism hub, I know from travelling myself around Australia you don't go looking for a tourist information centre or a "tourism hub" near a business hub. Why would you not use the "old farmhouse" and renovate that for the tourism hub, make the park and sport and active recreation hub in this area. Why can't that direct corner be preserved as parklands, where the tourism hub is, move it down to where the business hub proposal is, and also the sport and active recreation hub. Make it a picnic area like lizard log, etc.	Refer to the response to Item 8.
91.	I would also like to know which government department authorised the change of status of public land to an industrial zone. No information was sent directly to the residents of West Hoxton which	Refer to responses to Item 1 and Item 12.

Item	Key Issues Raised	Proponent Response
	I am located. I would like to see all relevant documents for the rezoning of this site and the government official that signed the changes of land status for this location. The Zoning of this area as industrial is just not logical considering the surround parklands and communities.	
92.	My other main concern is we have been getting a lot of native birds back in the area, Galah's, Cockatoos, Rosella's, the occasional Pelicans (even in the water ponds on the corner of Cowpasture road and Greenway Drive). I also believe the two water areas in the area have also attracted other wildlife like frogs as one example.	The potential impacts on the flora and fauna were assessed and considered acceptable by the Department of Planning and Environment prior to the determination of the Concept Approval. The proposal is consistent with the Concept Approval and no further consideration of the potential impacts on flora and fauna are required as part of this process.
93.	We have a right, as any Community does, to fresh air and safety. It needs to stay what it's designated as, a space for the community, flora fauna. To which we can all benefit as a community.	Refer to the responses to Item 8, Item 36 and Item 92.
94.	I also feel that Nulon is the type of development that poses a high risk of pollution to the community and contamination to the surrounding parkland. There is risk of Aquatic Hazard less than 100m away in the pond at Bidwell Park, where I have seen people fishing in the pond occasionally. Chemwatch.com has categorised most of Nulon's Products as Acute Aquatic Hazard Category 3, Chronic Aquatic Hazard Category 3 and any incident no matter the magnitude would affect the local parklands flora and fauna as well as the neighbouring properties cattle and land	Refer to the responses to Item 36 and Item 44.
Waste Management		
95.	In point 6.14 Waste Management in the EIS, it states that 'Wastes oil & water are to be collected by external waste service (Southern Oil) every 7-10 days.... Nulon determined to provide adequate storage space.' What is the capacity for storage of these waste oils? Are these waste oils included in the assessment of the overall quantity of storage materials?	The Waste Disposal Plan submitted with the EIS indicates that on average weekly oil and water waste is 1000kg and 800kg respectively. The waste oils have been included in the overall quantity of the facility.
96.	Where does the water go when you wash down the trucks or the concrete area on site? The water could be contaminated by oil/chemicals?	There is no proposed truck wash down as part of the facility.
Visual Impact		
97.	Also a statement in the newspaper, The Liverpool Leader on 22 Feb 2018, by Greg Simons is that the community won't even know they (The factory) are there, how is this so when the proposed development along with the future development are 1/3 to half the area size of Greenway Park Estate. This will be a visual impact on residents, especially those with houses that have a view (Panoramic or not) in Greenway Park Estate of the surrounding area. The Visual Sensors Receptors for all and many properties has not been taken into account when submitting the application. Greenway Park estate is not flat; it is situation on a hill with views as far Parramatta, Royal National Park and Sydney CBD. From my house I can see The Sydney Harbour Bridge. Resident's, one road higher than my property, have panoramic views of the greater Sydney and they can defiantly see the proposed development site at 10 Bringelly road Leppington, this been a view they do not want ruined by a view over a factory site.	The proposed building is generally consistent with the building envelope approved under the Concept Approval and the Urban Design Guidelines that apply to the site. The Department of Planning and Environment have requested that the red panelling on the eastern façade is amended. The plans have been amended to satisfy the Department's request.

Item	Key Issues Raised	Proponent Response
Property Values		
98.	People in the area did not purchase houses amongst green land to have a 'surprise' oil manufacturing plan in their backyard'	Refer to the responses to Item 8 and Item 12.
99.	If this factory is build there will also be financial implications for families as it will lower housing prices considerably, as not many people would want to live near an oil/ aerosol production factory/distribution centre. A more suitable location should be sort for the oil manufacturing company that will not directly impact the surrounding community.	Refer to the responses to Item 8 and Item 12.
100.	This is not only impact the environment and my whole family health. It will also affect my house market price dropping. Who should take the responsibility to this worst consequence?	Refer to the responses to Item 8 and Item 12.
Air Quality		
101.	- The smell, vapour, and fumes will interfere with the amenity of the neighbourhood and many residents which means it is not to be considered as "light industrial". - The proximity of Sensitive Residential Receptors reported in Appendix P "Air Quality Impact Assessment" (page 9) is wrong - assumptions of Wind directions are wrong and must be disputed. - The distance of residential properties (many in Horningsea Park - east of site - opposite side of Cowpasture rd) is closer to everyday operational emission of VOCs/storage tanks than stated in the report. These residents were not considered as 'Sensitive Residential Receptor' - they should be. These residents will be affected by smell, fumes, and vapour VOCs. - Impact of air emission , report states is based 'primarily on Wind speed & direction.'*** I don't think Wind observations obtained from Badgerys creek AWS (11km away!!) can be an accurate/reasonable representation of wind directions of Bringelly Road Business Park location as report claims - Too many residents & childcares (on Stuart rd) within 500m circumference of storage tanks and VOCs. I can foresee many complaints & sickness from childcare kids & residents from bad fume smells as fumes are "anticipated"	Refer to the response to Item 36.

Item	Key Issues Raised	Proponent Response
	Figure 3 Location of the Closest Identified Sensitive Receptor Location of storage of raw material What about the houses in pink circle, they should be Sensitive Receptors too, and received proposal letters SLR 2, Lincoln Street Lane Cove NSW 2066 T: +61 2 9427 8100 F: +61 2 9427 8200 www.slrconsulting.com The content within this document may be based on third party data. SLR Consulting Australia Pty Ltd does not guarantee the accuracy of such information. Project Number: 610.17717 Location: Bringelly Road Business Hub Other Information: Projection: UTM Zone 56S Date: 19/12/2017 Commercial and Industrial Property (CIP) Nulon Motor Oils Air Quality Impact Assessment Sensitive Receptors	

Item	Key Issues Raised	Proponent Response
		
102.	In point 6.15 Air Quality makes reference to volatile organic compounds and associated liquids. It states that the presence of these liquids in a warehouse have a negligible emission, however, this proposal is not solely a warehouse as it blends chemicals. At their current facility there are constant complaints of emissions from neighbouring properties. Nulon are proposing to increase the amounts of chemicals and production. How can this statement ring true?	Refer to the response to Item 36.
103.	The warehouse and bulk storage areas are ventilated with mechanical exhaust for potential small and exhaust fires. Can you please explain how this works?	There is no mechanical exhaust system for potential small and exhaust fires. The only mechanical exhaust system ducts the exhaust air from all bulk and blending tanks to a carbon filter prior to dispersing cleaned air. This is detailed in the Air Quality report in Appendix F.
104.	The gases from aerosols & poisons that oil can omit into the air will effects my sons capability to concentrate & effect his asthma.	Refer to the response to Item 36.

Item	Key Issues Raised	Proponent Response
105.	As far as air quality is concerned they have elected to install a charcoal filter however if this fails or is not maintained effectively this may cause odours to be released into the community. There is no safe guard for human or mechanical or electrical failure.	The proposal will comply with all relevant Australian Standards and industry codes.
106.	it has the potential to cause harm through long term exposure to emissions. A guarantee can not be given to the local community that harm will not be caused, despite the environmental impact statement, as long term exposure can never truly be predicted. Leppington is part of the South Western Sydney growth corridor and many young families are relocating to this area. The long term impact of the emissions are potentially dangerous to the community as a whole but particularly to the young children who are living and going to school in this region. I have a toddler who attends a day care centre off Bringelly road, and the possibility of harmful substances being emitted from the facility would make me want to relocate him out of the area.	Refer to the response to Item 36.
107.	Nulon Motor oils is not a business that should be located so close to a residential area. At the end of the day there should be a no tolerance policy for mishaps that can happen that will affect so many residential properties and seriously Oils do smell and this is not an aroma I want to be smelling in my area.	Refer to the responses to Item 1, Item 8 and Item 36.
108.	Community members with pre-existing medical conditions in the area such as autism, asthma, hay- fever and other medical conditions may be greatly affected if this development, and the factories proposed future developments, were to be approved. This type of Development would be more suited for an industrial area.	Refer to the responses to Item 1, Item 8 and Item 36.
109.	The report identifies 2 'Sensitive resident Receptors' closest to the Development Site boundary. NOTE location of "boundary" site & location of "raw material storage & blending" are 2 different areas. Therefore the method in choosing 'Sensitive Residents Receptors' should be based on distance from the Blending and filling location which is to operate during the Operational phase. Looking at attached pdf shows the residents in Horningsea Park are the same distance as the 2 residents identified by SLR Consulting Pink circle shows residents which are in same circumference as the identified properties. These residents are too close & should be notified.	Refer to the responses to Item 36 and Item 65.
110.	Report contradicts itself, saying on page 7 "raw material storage and production ...bulk storage area proposed to be located at the northwestern end of Lot 8, further away from the closest resident receptors". But in actual fact the closest resident receptor is measured from its boundary and not storage area. Therefore residents in Horningsea Park should be consulted too.	Refer to the response to Item 65.
111.	As report states on page 10 that there will be smells, vapour, fumes , "During operations in the warehouse, emissions of volatile organic compounds (VOCs) and associated odour are anticipated, due to evaporative losses during blending, filling as well as working and standing losses from the storage tanks". Therefore it is known that the vapours will be present, and that the wind will pass the smell to all surrounding residents - this totally against what a Light Industry is as stated by Masud Hasan - Executive Planner of Liverpool City Council.	Refer to the Response to Item 1 and Item 36.
112.	Validity of Wind Report mentions on page 9 that "The impact of air emissions upon nearby sensitive receivers is dependent on the prevailing meteorological conditions (primarily wind speed and direction) but also the distance from the source to the receiver and any mitigation between	Refer to the response to Item 36.

Item	Key Issues Raised	Proponent Response
	the source and receiver". The report on page 11 is making assumptions that the wind conditions in Badgerys Creek AWS (11 km away) is the same as the wind in Horningsea Park/West Hoxton. "Considering the relatively flat terrain between Development Site and Badgerys Creek AWS, it may be assumed that the wind conditions recorded at the Badgerys Creek AWS are a reasonable representation of the wind conditions experienced at the Development Site." This should be disputed too. Should not make assumptions or make reasonable representations when there are over 100 houses & 3 childcares within a 500 metre circumference of the storage site.	
113.	The Air Quality Impact Statement states on page 10 that "emissions of volatile organic compounds (VOCs) and associated odour ARE ANTICIPATED". How can a development from which fumes "are anticipated" possibly be suitable for approval so close to families and homes?	Refer to the response to Item 36.
114.	A statement of neutral impact is anticipated to the environment is not provided with any evidence. I note Table 8 provides evaporation rates (further unsubstantiated by lack of MSDS documentation, although a web search will confirm these values for all except NB3070 Glycool 670 which could have been appended to the document), however, evaporation rates alone do not provide assessment of the impact to the air quality such that neighbouring residences may be affected by the odours (harmful or not) coming from the facility. Both the sections referring to "Receptor Sensitivity" and "Magnitude" make reference to risk assessments and a quantified review of the impact whereas this section referring to "Nature of Impact" is unsubstantiated. The final statement prior to the conclusion notes a vegetative buffer existing between the Development Site and the existing sensitive receptors located to the North. A quick survey of the map displays that the two highest impacted residence (approx. 20m and 50m away from the site) do not benefit from this existing vegetative buffer and these locations are the areas of highest impact. Furthermore, the development plans have not included any detail for the planting of advanced trees. The site's location necessitates the removal of trees and no inclusion in the plan commits to the replacement of that vegetation apart from a "Not for Construction" landscape plan which results in little to no commitment to undertaken the planned work. Requirements for the planting of advanced and super advanced trees should be included within the proposal. Please consider these concerns as an assessment to reduce the risks and negative impacts to the surrounding neighbourhood so far as is reasonably practicable does not appear complete.	Refer to the response to Item 36. The Amended Landscape Plan submitted with the RTS report as Appendix N indicates that hedging and feature shade trees will be planted along the eastern boundary. Detailed plans will be provided prior to construction as a condition of consent.
Other / Admin		
115.	Has anyone who has created reports for this site, actually been to the site? It is very easy to assess a property without looking at the bigger picture. To make holistic assessment the surrounding area must be taken into account.	The consultant team have visited the site and surrounds.
116.	On page 12 of the EIS, Ethos Urban make reference to the site being located within the Blacktown Local Government Area and having frontage to Rooty Hill Road. Why?	This reference is a typographical error. It should have referenced the site being in the Liverpool Local Government Area and having frontage to Bringelly Road.
117.	We note that on page 28 of the EIS it makes reference to the current inventory for the site at Moorebank. What is the proposed inventory for Horningsea Park?	Quantities of goods to be stored and handled within the proposed facility are outlined within Section 3.5 of the Preliminary Hazard Analysis (PHA) included at Appendix D of the RtS.

Item	Key Issues Raised	Proponent Response
118.	What is the quantity and type of machinery and equipment that will be used at the Horningsea Park site?	The existing process, operational machinery and equipment is illustrated and described at Section 3.3.6 of the RTS report. The quantity and types of machinery to be used at the proposed facility will be of a similar nature.
119.	This development is within the vicinity of Heritage Item Carnes Hill Vegetation Group listed in Schedule 1 of State Environmental Plan (Western Sydney Parkland) 2009 and incorporates heritage item 17 Bringelly Road Cultural Landscape in Appendix 8 of State Environmental Protection Plan (South West Sydney Growth Centres) 2006. Has a Heritage Assessment been carried out to determine if there are any risks to these heritage items?	The heritage impacts of the Concept Plan were previously considered by the Department of Planning and Environment as part of their assessment of SSD 6324. The proposal is generally consistent with the Concept Approval and no further issues have been raised by the Department or the Office of Environment and Heritage.
120.	We have been advised that additional products will be manufactured there however not told what they are, once that are on site they will be able to get approval possible start making aerosols. They have done this in the past when they moved to Moorebank where finished goods were stored for resale and then they decided to start blending oil and we are aware that Liverpool council has had numerous complaints about odours.	The operations will be bound by any future conditions of consent.
121.	A review of Nulon's application should be considered because of Greg Simons (Nulon CEO) statement in a newspaper article that the new facility would double its production, whereas the application states different and the statistic for the motor oil production, based on Nulon's Moorebank facility should not be considered in the Development Application, it may or may not be fabricated but it is not the correct percentage of production and storage for the proposed facility. A new Development application should be admitted with evidence of the correct proposed production and storage figures. The data of the maximum quantities of products and DGs that are to be stored at the warehouse are taken from and based on the existing site operations, at Moorebank facility, with allowance for a level of inventory growth into the future. Aerosols 35,000 L, Combustible liquids 1,066,025 L, LPG Cylinders 8,750, this cannot be correct for the magnitude in size of the proposed facilities storage area is much greater.	The proposed production quantities accurately reflect what is proposed to occur on site.
122.	Although this may be outside of the planning departments authority I need to address it as the Western Sydney Parklands may have exceeded its authority and intent for the proposed Bringelly business hub, They have issued the Department of planning there authority to allow Nulon to set up shop on the site as 'warehouse, office and admin' which is not what Nulon is but manufacturing (as signed by Sullen Fitzgerald). Additionally the Western Sydney Parklands Act 2006 Sect 16 (refer attachment A). Dealings in relation to trust lands subsections 1 to 7 requires the ministers approval on long term leases which was not signed by the minister but only the Parklands Trust on the contracts with Charter Hall. There also maybe a conflict of interest that the parklands Trust who reports to the Environment and Heritage minister has now shared rolls with the Planning Minister. Also Section 2 of the same act Functions -Generally subsections 1 to 7 clearly states that the land is to be used for public use and enjoyment, open spaces and conservation of natural land etc (refer	Refer to the response to Item 1.

Item	Key Issues Raised	Proponent Response
	attachment B) and the intent of subsection (2) part(j) as commercial interest as kiosks restaurants and not major commercial developments.	
123.	It is illogical and no local family should be expected to accept such risks, or possible reduction to their property value, from a new development immediately next to their long established suburb	Refer to responses to Item 8 and Item 12.
124.	The term "allowance for a level of inventory growth into the future" does not weigh with what the proposed future development will be, how much allowance will that be?	The allowance for inventory growth has been factored into the assessment of the proposed facility.
125.	I am sure there are many other issues why this site is unacceptable for this type of development, I believe there has been collusion between a government department and the lessee of the site. If not only stupid people think highly flammable chemicals should be stored next to residential areas. And who knows what else they will store in the next expansion of this site WMDs as resident we have the right to challenge this type of development as it is not in the local communities best interest for any major industrial development on this site.	Refer to the responses to Item 1, Item 8, Item 12 and Item 36.
Storage		
126.	In the EIS it states there will be a 521sqm of bulk storage area. What is going to be stored there?	Section 3.2.6 of the RTS report discusses the process units within the proposed facility. The storage tanks (as described within Table 1 of the RTS) will be contained within the Bulk Storage Area. These tanks store the oils in bulk prior to blending.
127.	What will be stored in the raw material storage area?	The Preliminary Hazard Analysis (PHA) submitted with the RTS as Appendix D outlines the proposed materials, volumes and storage arrangements. The raw material storage area will store empty packaging and smaller volumes of liquids that are delivered to the blending and packaging areas. Further details relating to the storage of goods are outlined for the proposed facility within the Process Flow Chart and corresponding information included at Appendix H of the RtS.
Fire Safety		
128.	The site is within a bush fire prone area. It was only a few years ago we encountered a fire that was so close we could see the flames from our backyard, the smoke was thick making it hard to breath, the water bombers were extracting water from the water catchment area adjacent to the fire station.	Rural Fire Service NSW requested a development specific bush fire report be prepared, that outlines the proposed developments compliance with <i>Planning for Bush Fire Protection 2006</i> . Section 3.11 of the RtS outlines the proposals assessment against the requirements. The RtS states: "Ecological have prepared a Bushfire Protection Assessment (included at Appendix P).. The assessment has been prepared in accordance with 'Planning for Bush Fire Protection 2006'. The proposed development complies with the acceptable solutions within 'Planning for Bush Fire Protection 2006' and can achieve the maximum threshold of <10 kW/m2 radiant heat exposure.

Item	Key Issues Raised	Proponent Response
129.	We are led to believe that a Fire Water tank is provided on site in case of fire but we all know water does not put out oil fires. In fact the water on hot oil creates steam which leads to explosions etc. This development is very close to residential areas, schools and child care centres. If there was an oil fire, how would this be managed?	The Preliminary Hazard Analysis (PHA) submitted with the RTS as Appendix D includes an assessment of the potential for fire within the proposed facility, including combustible liquid ignition and fire. Section 3.2.5 of the RtS further outlines incident response procedures assessed within the PHA, and notes that the site shall be designed to contain any spills or contaminated water from a fire incident within the boundaries of the site. Refer to Nulon Process Flowchart included at Appendix H of the RtS for further details relating to fire prevention mitigation measures. These generally include appropriate fire suppression systems designed to Australian standards, and appropriate separation of flammable materials.
130.	You have a 10m fire exclusion zone around the proposed facility at Horningsea Park. The fires at Holsworthy are proving devastating. The fires jumped roads, railway lines and rivers. Ember attack and ember showers are dangerous. Why do you think the 10m exclusion zone would be sufficient in the event of a fire in the parklands considering the types of materials stored in the facility?	The 10m Asset Protection Zone to the south was assessed and approved under the Concept Plan (SSD 6324). The EIS for SSD 6324 states: A 'defendable space' of a minimum 10m is recommended to provide an area within the APZ that provides an environment in which a person can undertake property protection after the passage of a bushfire within some level of safety. The proposed facility is consistent with the approved concept plan (SSD 6324).
131.	What is the emergency evacuation plan for the community? In particular on Stuart Road and in the Horningsea Park area when one of 3 exit points of these suburbs is via Joshua Moore Drive onto Cowpasture Road?	The assessment undertaken and submitted with the RtS has determined that the proposal will not increase the fire risk to the surrounding residential neighbourhoods. A Bushfire Emergency Response and Evacuation Plan (following the NSW RFS (2014) Guide to developing a bush fire emergency and evacuation plan), will be prepared for the facility prior to occupation.
132.	In case of fire with in the Nulon plant it only has a 600,000 litre tank with sprinklers to put out the fire this is only a minimum and will not put out chemicals and oils held on site as foam retardant is the only method for this type of manufacturing site. They are proposing having a back to base to two fire stations unfortunately the only one within close proximity is Horningsea Park which only has one fire truck and not set up for a major chemical spill or fire, also the surrounding area is a fire prone hazard for housing, rail line and the community in general.	Refer to response to Item 131.
133.	This part of the Sydney Western Parkland is also a bush fire prone area, which has been acknowledged by The NSW Rural Fire Service, and also was shown on 22 February 2017 by there being a large fire in the West Hoxton area which threatened nearby residents. A house fire on Cowpasture Road on 21 July 2017 and another grass fire at the back of Carnes Hill Market Place January 2018. A grass fire also burnt about 200 hectares in West Hoxton on 15 November 2009. In the last 12 months the community has had several grass fires, randomly located with suspicion of a pyromaniac, which is another factor that should be considered.	Refer to response to Item 128. Refer to response to Item 137 for further details relating to Bedwell Park.

Item	Key Issues Raised	Proponent Response
	Also, point of interest, the pond in Bidwell Park (the adjoining parkland property) has in the past been used by NSW RFS to fill water bombing aircrafts to help contain fires in the surrounding areas, that won't be a possibility in future if there is any likelihood that the pond may be contaminated from the proposed development.	
134.	The correlation bantered around that petrol stations are more hazardous than NULON is preposterous, petrol stations are the most regulated industry in the country, the guidelines enforced due to direct contact with the public who use them daily have ensured safety system are conducted at the highest level. Greg Simmons also said that they have water and foam that would immediately spray onto the tanks if a smoke sensor was triggered, prior to a flame being present, does he know that if there were a worst case scenario that played out due to lighting strike/ bushfire/ sabotage/ terrorism no amount of first response fire protection would be able to cope with the effects of the ignition of the stored amount of combustibles. As in incidents around the world have confirmed if water is applied to an oil fire the water will turn to steam and cause an explosion, I am sure the RFS has massive concerns surrounding this flammable liquid storage/ manufacturing and distribution facility being within a bush fire zone. The locality of the Horningsea Park fire station must have been a welcome addition to their new site as they would be the actual fire responders in the event of a major incident.	Refer to response to Items 36, 128 and 129.
135.	In the correspondence from Eco Logical, it mentioned that "While not specifically mentioned, it is understood that the storage of flammable materials in the Nulon Motor Oils Facility is adequately covered through the application of the 10m proposed APZ to the south. This APZ has been determined in accordance with the requirements of the Planning for Bush Fire Protection 2016 table A2.4, and has considered the sites vegetation (consisting of Grassland to the south) and slope (>0-5 degrees downslope to the south). It is understood this APZ will be provided by Bringelly Road." What is understood and not specifically mentioned? Again this is questionable. It is detrimental to the surrounding area which was supposed to have been a part of a Greenbelt, regional parklands and waterways. 170 protected species have been identified as being located just in the waterway area alone.	A Flora and Fauna Assessment has been prepared in support of the approved Concept Plan (SSD 6324), (ELA 2014 <i>Flora and Fauna Assessment for the Bringelly Road Business Hub State Significant Development</i>) containing recommendations to mitigate potential impacts from the proposed development. Site impacts have been minimised by carefully selected bushfire protection measures. The proposed facility is consistent with the approved concept plan (SSD 6324). Ecological have prepared a Biodiversity Assessment Report Waiver (included at Appendix O of the RtS), which concludes appropriate measures have been proposed to mitigate bush fire risk and the impacts on flora and fauna will be mitigated by the required offsets under Concept Plan Approval (SSD 6324).
Water Treatment and Flooding		
136.	In the Integrated Water Management Strategy by Umo Lai, it states that the major system will be designed to cater for storms up to an included the 1 in 100-year ARI storm event (Q100). The major system will employ the use of defined overland flow paths, such as roads and open channels, to safely convey excess run-off from the site. Bedwell Park, Cowpasture Road and Joshua Moore Park Drive to the north of the site are flood prone land. In the 1 in 100 year storm event, this area is already under water. This intersection of the road is closed due to flooding. Can you guarantee that this development will not make the flooding worse in this area?	The Integrated Water Management Strategy by Umo Lai, included with the EIS concluded that the proposed water management measures are in accordance with the current regulatory requirements, and can adequately address the water management issues relevant to the site.
137.	The water body(s) within Bedwell Park are proposed to form a component of the stormwater treatment system for this development. As such why was a Flora and Fauna Assessment not	Wastewater and waste products will be managed in accordance with the relevant standards to prevent any off-site contamination. Contaminated waste water is stored within an Intermediate Bulk Container (IBC) on Site until collected by a

Item	Key Issues Raised	Proponent Response
	carried out on Bedwell Park to identify any adverse effects flowing on from having the stormwater system discharging into this reserve/water body?	waste contractor. Refer to the updated Environmental Management Plan (Appendix L) prepared by Nulon, and Civil Engineering Report (Appendix Q) for further stormwater discharge containment mitigation measures. Stormwater treatment measures will be implemented in accordance with the Liverpool Council Policy and the strategy and measures outlined in the Concept Plan approval (SSD 6324) to ensure proposed development will not have adverse impacts on water quality or flora and fauna.
Employment		
138.	If Nulon builds a factory in the proposed position I feel that they will be taking away potential jobs opportunities from our communities, because Nulon is relocating from Moorebank and bringing existing employees with them. More employment opportunities would be accessible if there were to be new warehouses, factories retail stores, restaurants, and other more desirable developments built in the area. Nulon would only be creating 45 employment positions as to double the job opportunities that could be available. 45 job opportunities are not very high. I do understand that there will be warehouse and factory developments, in the Bringelly Business Hub which I am not against.	There is no guarantee that any other alternative development would generate more income than the proposed Nulon Motor Oils Facility. The proposed development would overall still generate a positive outcome for the locality in providing approximately 40 new job opportunities.