

30 November 2018

218555

NSW Department of Planning and Environment
320 Pitt Street
SYDNEY NSW 2000

Attn: Chloe Dunlop

Dear Chloe,

RE: Response to Council Submission - SSD 9511

This letter has been prepared on behalf of CIP and Charter Hall in response to the matters raised in the Liverpool City Council letter dated 23 November 2018. The Council's matters are addressed below.

1.1 Public Engagement

We understand Council's desire for CFC to commit to a high level of public engagement throughout the project. However, the proposal is entirely consistent with the Concept Approval and does not include the use or production of hazardous or dangerous materials. The degree of public engagement undertaken to date is beyond the statutory requirements and included the following:

- engagement Council and other relevant authorities and bodies prior to lodgement;
- placement of quarter page advertisements in the Wednesday 15 August 2018 editions of the Liverpool Leader and the Liverpool City Champion;
- a letterbox drop to all properties within a 1km radius of the eastern border of the site (the closest edge to residential dwellings), which resulted in approximately 1,900 dwellings and businesses receiving a short newsletter containing information on the project; and
- the establishment of an interactive project website, an 1800 hotline and a monitored email address.

These actions generated five enquiries as detailed at Section 4.0 of the exhibited Environmental Impact Statement (EIS). Further, the application received no submissions during the exhibition period (18 October 2018 to 15 November 2018), which, when taken in the context of the significant public interest to the neighbouring SSD 8900, indicates that the community are not opposed to the proposal.

Nevertheless, CIP / Charter Hall will continue public engagement on the project through the Bringelly Road Business Hub website.

1.2 Air Quality

We note Council's comments, an Air Quality Action Plan is contained in the Construction Environmental Management Plan submitted at Appendix P of the EIS. The Plan includes the installation of dust monitoring gauges which would be analysed monthly to ensure that no adverse air quality impacts arise. A number of other key actions have been included to ensure appropriate air quality through construction, including:

- During construction:
 - *Ensure dust suppression resources are provided on-site (i.e. water carts).*
 - *Ensure trafficable areas are clearly defined and stabilised and the on-site speed limit is adhered to.*
 - *Maintain construction equipment including trucks and vehicles, to reduce exhaust emissions.*
 - *Control any dust generated from the demolition and removal of existing buildings and structures.*

- *Keep dust-generating activities to a minimum during dry and windy conditions. Cease all works that have the potential to generate dust in excessively windy conditions and/or use fine mist sprays to suppress the dust.*
- *Keep large, unprotected areas moist during windy weather. If water is insufficient, soil binders and/or dust retardants may be used.*
- *Load and cover trucks and ensure the tailgates of all trucks transporting spoil from site are securely fixed prior to loading and immediately after unloading.*
- *Ensure there is no burning of waste material on site.*
- *Minimise diesel pollutant impacts on surrounding land uses by turning off diesel combustion engines on construction equipment not in active use and on dump trucks that are idling while waiting to load or unload material; and ensuring vehicles are well maintained.*
- Post construction:
 - *Stabilise soils as soon as practicable after disturbance to prevent dust generation.*
 - *Progressively rehabilitate all disturbed areas to their original condition as soon as possible to prevent dust generation.*
- Monitoring requirements:
 - *Visually inspect the site on a regular basis to check for the deposition of dust. Where a significant accumulation of dust is determined, review practices in this area.*
 - *Install dust monitoring gauges and analyse monthly.*

These have been further detailed at Appendix P of the EIS and will appropriately mitigate any potential air quality impacts at the site.

1.3 Noise Impact

Council's request can be addressed during the detailed design and development phase of the proposal. This typically happens post determination once there is certainty that the project will proceed. The submitted Acoustic Study recommends a review process to enable final acoustic impacts to be identified and mitigated. An appropriate condition of consent is a reasonable way to address this issue.

1.4 Advertising Signage and Lighting

The proposed signage was assessed against the Site Design Guidelines – Bringelly Road Business Hub June 2015 (EIS, Appendix F), and SEPP 64 (EIS, Section 5.8). The assessment concluded that the proposed signage complied with the relevant matters for consideration. Outdoor lighting will be constructed and operate in accordance with the relevant standards and an outdoor lighting plan is unnecessary.

1.5 Routine Environmental Audits

The proposal does not include the use or manufacture of hazardous or dangerous goods. The EIS has demonstrated that there would be no adverse environmental impacts from ongoing operation of the development. Routine environmental audits would be excessive and onerous. We strongly believe that they are unnecessary for this proposal.

1.6 Social Impacts

A significant social impact assessment was undertaken as part of the Concept Plan. The findings of the social impact assessment were accepted by the consent authority when determining the Concept Plan. The EIS assessed social impact at Section 7.1. The proposal is consistent with the Concept Approval and has received no public submissions during the exhibition period. An additional social impact assessment is unnecessary.

1.7 Traffic Generation and Access

Council's comments are noted.

Concluding Remarks

We thank the Department for the opportunity to respond to the Council's letter and trust that the above information assists with the assessment of SSD 9511. Should you wish to discuss this letter further, please contact me on 9956 6962 or tsmith@ethosurban.com.

Yours sincerely,



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