

10 October 2022

2210679

Chris Ritchie
Director, Industry Assessments
Department of Planning and Environment

Attention Bruce Zhang

Dear Chris,

DHL Warehouse and Distribution Centre – SSD 36156297 + SSD 5248 MOD 2 Response to Submissions and Project Amendment Report

Ethos Urban acts on behalf of DHL Supply Chain (Australia) Pty Limited and Gazcorp Pty Ltd regarding the State Significant Development Application SSD-36156297 and SSD 5248 Concept Modification 2, relating DHL's proposed Warehouse and Distribution Centre at Lot 11/12 in the Gazcorp Industrial Estate.

The purpose of this letter is to provide a Response to Submissions (RTS) addressing the issues raised by the Department of Planning and Environment (DPE), other government agencies and Fairfield City Council received during the exhibition of the proposal. A summary of the submissions and a response to each of the issues raised in the submissions is provided at **Attachment A**.

In response to issues raised in submissions, as well as the prevailing market conditions relating to construction costs, the proposed development has also been amended. This letter therefore also sets out amendments to the proposed development, and provides additional environmental assessment of the amendments, where necessary. Revised development plans for the proposed DHL Warehouse and Distribution Centre are provided in **Attachment B** (Architectural), **Attachment C2** (Civil Engineering and Stormwater) and **Attachment D** (Landscape), and a revised concept plan for the estate is provided at **Attachment E**.



Yours sincerely,

Tim Ward

Director, Planning (Environmental Assessment)
Tel: 0450 133 453, Email: tward@ethosurban.com

Attachments:

- A. *Submissions Summary and Responses (Ethos Urban)*
- B. *Revised Architectural Plans (SBA Architects)*
- C. *Revised Civil Engineering and Stormwater (Orion)*
- D. *Revised Landscape Plan (Site Image)*
- E. *Revised Mod 2 Estate Masterplan and Subdivision Plan (SBA Architects)*
- F. *Traffic Letter (Ason)*
- G. *Revised Environmental Noise Impact Assessment (Acoustic Logic)*
- H. *Hazards Response Letter and revised Preliminary Hazard Analysis (Riskcon)*
- I. *Operational Air Quality Impact Assessment (SLR)*
- J. *BDAR Waiver Request (Ethos Urban)*
- K. *Revised ESD Report*

1.0 Amendments to the Proposed Development

1.1 Amendments to DHL Warehouse (SSD-36156297)

Changes have been made to the design of proposed DHL Warehouse on Lot 11/12, partially in response to issues raised in submissions, but predominantly made as part of value engineering process to ensure the proposed development remains viable. As such, the amended development is generally smaller and less impactful compared to the proposed development that was described in the EIS and publicly exhibited. The revised development plans for SSD 36156297 are provided at **Attachments B to D** (architectural, civil engineering, and landscape plans respectively), and a summary of the key amendments is provided below.

1.1.1 Built Form

- Elimination of secondary 'VAS Office' as DHL operations no longer requires it.
- Change in configuration of the 'Main Office' to a single level office instead of two levels and a subsequent change to the façade treatment.
- Dock Office on east elevation reduced in size as the larger dock office configuration is no longer required by SHL. The dock office now matches the configuration of the western elevation dock office.
- North East corner of super awning reduced in size to allow a fire truck to 3 point turn without passing underneath an awning.
- Sprinkler tank and fire pump room relocated from south east corner to western side of the site. This was done to reduce the visual impact of this required infrastructure and provide a larger landscaped area to the front of the site.

1.1.2 Parking

- Reduction in parking from 194 spaces to 164 due to DHL's operational requirements. Noting the revised minimum required parking spaces is 134, this has allowed for an increase in landscaped area and an elimination of retaining walls in the south west corner of the site which will improve visual amenity.

1.1.3 Civil and Stormwater

The proposed storm water management system has been amended, as set out in the revised stormwater plans provided at **Attachment C2**, to comprise:

- The On-site Stormwater Detention (OSD) configuration has been amended to provide storage capacity over two (2) OSD tanks rather than one, located underneath the hardstand in the north-east corner and north west corners of the DHL site. This is to aid in the constructability of retaining walls along the northern site boundary. OSD tanks (cumulatively) would have a minimum effective storage volume of approximately 2.3 megalitres.
- Pipe routes along the northern hardstand area have been revised to route stormwater into the second OSD tank.
- Rainwater tanks have been revised to capture minimum 80% of the roof area in accordance with Fairfield City Council's Stormwater Management Policy. Rainwater Tanks will be plumbed to service 10 toilets and to irrigate all pervious areas except the tail out drain at the rear of the property. Rainwater tanks with total combined capacity of 89 kilolitres are proposed to achieve rainwater reuse for 80% of the site's non-potable water requirements.

1.1.4 Landscaping

- Landscaped 'finger' in the North East corner of the site reduced in length to allow a fire truck 3 point turn in this corner of the site.
- Landscape setback to proposed estate road increased from 3m to 4m. More extensive landscaping provided at the entry of the site and around the main office in the south-west corner of the site.
- Species selection has remained largely the same, with the inclusion of an additional Cumberland Plain Woodland species.
- Landscaping has also been revised to comply with the requirements of the bushfire report, including
 - Tree canopies should be separated by 2 to 5m
 - Trees at maturity should not touch or overhang the building
 - Shrubs should not be planted underneath trees.

1.1.5 Consolidated Project Description

This SSD application seeks approval for the development of the DHL site to permit an industrial warehouse and distribution centre within the Gazcorp Industrial Estate. The proposed DHL warehouse and distribution centre would be used for the purpose of temporary storage and distribution of packages, with an associated office. This development of the site will comprise of the following:

- Construction of an industrial warehouse and distribution centre with approximately 29,516 m² of industrial warehouse floorspace.
- Construction of ancillary offices with approximately 1,000 m² of floor space on a single level, plus two smaller dock office spaces around the warehouse comprising approximately 388 m² in total (each dock office is split over two storeys) and a gatehouse (20m²).
- Building height of 14.6m.
- Construction of an internal access ring road, with access to loading docks on the eastern and western sides of the warehouse.
- A total of 5 on-grade loading docks and 9 recessed loading docks located on the western elevation, and 8 on-grade loading docks and 9 recessed loading docks located on the eastern elevation.
- 15m wide awning over at-grade docks on western elevation and 34m wide awning on eastern elevation providing weather protection over at-grade docks, and 3m awnings over recessed docks on both elevations.
- Construction of a light vehicle car parking area for 164 cars with separate access to the estate road.

1.1.6 Comparison

A comparison of the numerical aspects of the proposed DHL Warehouse and Distribution Centre is provided in **Table 1**. As can be seen in the table, every aspect of the development is smaller than what was originally exhibited. As such, environmental impacts associate with the proposed development would be similarly expected to be lower compared to the proposed development as originally exhibited.

Figure 1 shows the originally exhibited site plan next to the now proposed site plan. **Figure 2** shows the oblique angle perspective from the south-west corner of the site, for the building as originally exhibited next to the now proposed building.

Table 1 Comparison of EIS Exhibited and Amended Scheme

	EIS Exhibited scheme	Proposed Amended scheme
Warehouse area:	29,710	29,516
Dock office 1:	195	194
Dock office 2:	380	194
VAS office:	320	0
Main office:	1,095	1,000
Gatehouse:	20	20
Total:	31,720	30,924
Car parking provided	194	164
Car parking required:	148	134
Site area:	56,717	56,717
Site coverage		

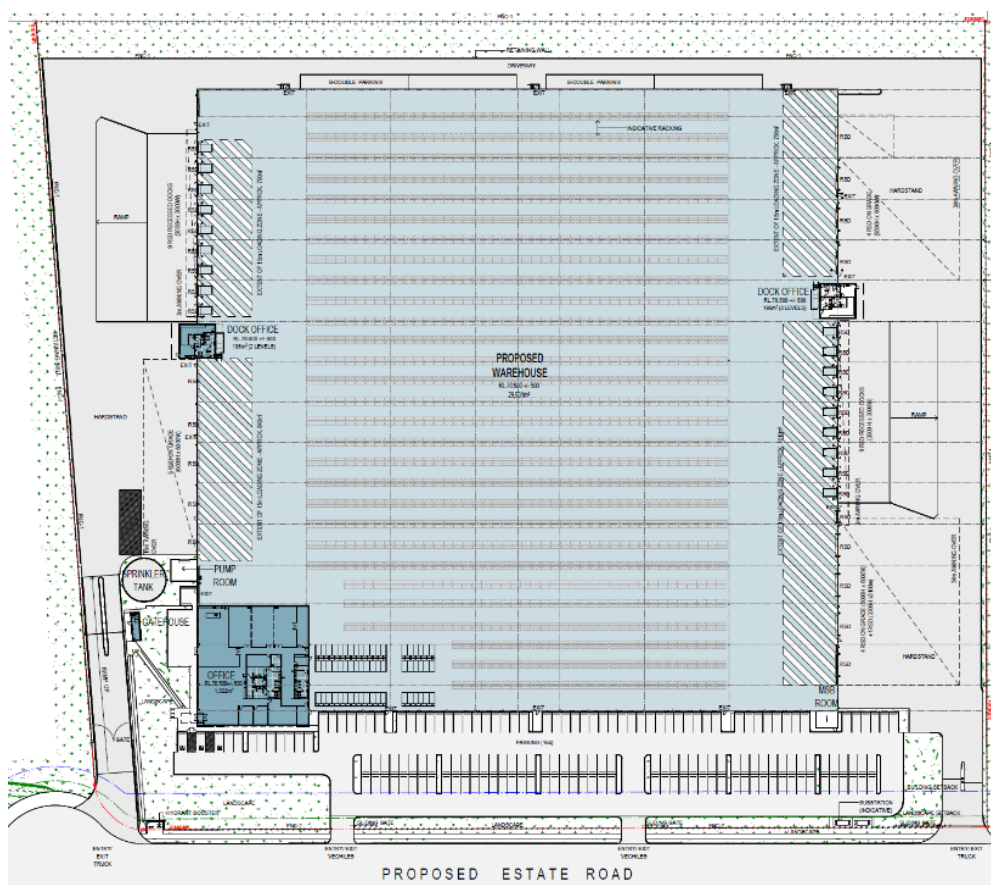
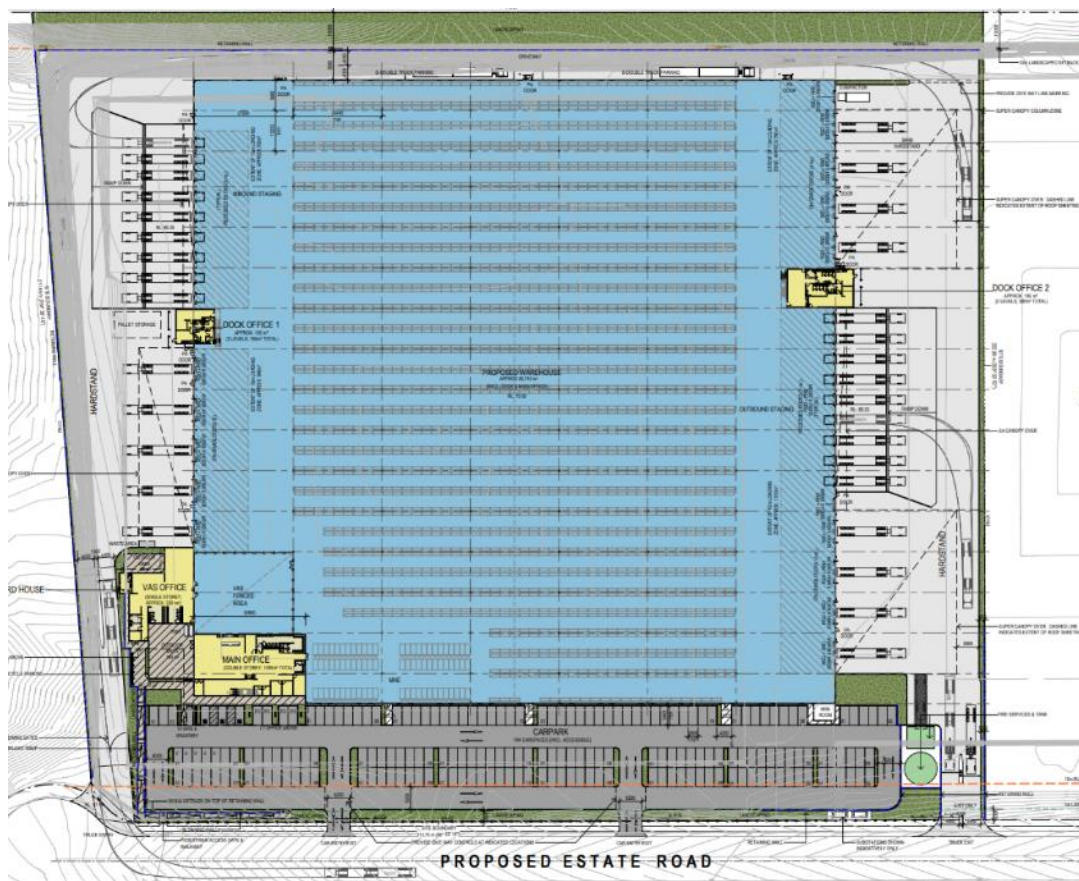


Figure 1 Site Plan – as originally exhibited in the EIS (top) and as amended (below)



Figure 2 Oblique angle perspective – as originally exhibited in the EIS (top) and as amended (below)

1.2 Amendments to the Gazcorp Industrial Estate Masterplan (SSD-5248 MOD2)

Consequential changes have been made to the conceptual arrangement of buildings and infrastructure as part of the Gazcorp Industrial Estate Masterplan. The updated estate wide masterplan is provided at **Attachment E**.

Attachment E also includes an amended Subdivision Plan. The amendments to the Masterplan and Subdivision Plan include:

- Masterplan: Minor refinements to the internal estate roads to ensure they can accommodate 30m Super B-Doubles.
- Masterplan: Revised development area schedules taking into account more recent pre-construction survey data and the revised design of the DHL Warehouse and Distribution Centre on Lot 11/12.
- Subdivision Plan: Inclusion in the Subdivision Plan of Lot 201, being the stub at the Wallgrove Road intersection to provide for signal controls for TfNSW.
- Subdivision Plan: Inclusion on the Subdivision Plan of the easements and future infrastructure corridors associated with the Southern Link Road, the Western Sydney Freight Line, the Transgrid Transmission Line and the Reedy Creek riparian corridor.

The revised stormwater management arrangements on Lot 11/12 also require consequential refinement for stormwater management on Lot 13. These refinements have been accounted for in the revised estate-wide Stormwater Management Report at **Attachment C**, which in particular includes adjustment for the OSD requirements on Lot 13.

A consolidate description of the Gazcorp Industrial Estate as it is proposed to be modified (and as amended) is as follows:

A Concept Proposal with:

- *218,628 m² of gross floor area (GFA) comprised of 207,924 m² of warehouse/industrial uses and 10,704 m² of ancillary office floor space;*
- *14 warehouse buildings; and*
- *Conceptual lot layout, site levels, road layout, urban design controls, conceptual landscape designs and infrastructure arrangements.*

It is highlighted that proposed Modification 2 does not affect the Stage 1 project approval.

2.0 Response to Submissions

The proposal was publicly exhibited between 12 May 2022 and 8 June 2022. The submissions received are outlined below:

- Department of Planning and Environment – Environment and Heritage Group
- Department of Planning and Environment – Water Group
- Transport for NSW
- Water NSW
- Sydney Water
- Rural Fire Service
- Fire and Rescue NSW
- Fairfield City Council
- Endeavour Energy

No submissions from the general public were received.

A summary of submissions is provided in **Attachment A**, which also includes a response to each issue raised in the submissions. It is highlighted that some organisations made separate submissions for the SSD-36156297 and the Concept Modification 2. In particular separate submissions were received from Fire and Rescue NSW, Transport for NSW and Water NSW, and in all three cases the agency did not raise any issues in relation to Concept Modification 2. Fairfield City Council made a single submission, which included issues relating to both SSD-36156297 and Concept Modification 2. The response provided in **Attachment A** highlights which issues are Modification 2 issues.

Based on its review of the proposed development and consideration of the issues raised in submissions, the Department of Planning and Environment has also requested further information in relation to a number of matters in accordance with clause 59 of *Environmental Planning and Assessment Regulation 2021*. A response to each of these issues is provided below.

2.1 Construction Impacts

Items 1 & 2

Please clarify how long construction of the proposed DHL Warehouse and Distribution Centre would take?

Please clarify if construction of the proposed DHL Warehouse and Distribution Centre would occur concurrently with the estate-wide bulk earthworks and construction of Stage 1 warehouse (i.e., Warehouse 10).

Applicant Response:

Construction of the DHL Warehouse and Distribution Centre is expected to take 9-12 months.

The DHL Warehouse and Distribution Centre would be constructed concurrently with the Stage 1 bulk earthworks. The staging for the Stage 1 warehouse on Lot 10 has been deferred, and is not expected to occur concurrently with the Stage 1 (bulk earthworks) or proposed Stage 2 (DHL Lot 11/12 SSDA warehouse).

The traffic report prepared for the approved SSD 5248 envisaged the Lot 10 building works concurrent with the bulk earthworks as part of Stage 1 development. That is, with a cumulative construction traffic impact from concurrent Lot 10 warehouse construction and the bulk earthworks for the Estate. With this in mind, concurrent development of the Stage 1 earthworks and the Stage 2 DHL warehouse construction can be considered consistent with the original SSD 5248 approval, noting that the Lot 10 building comprised a GFA of 44,419m² (per the approved MOD 1 master plan) and the proposed DHL warehouse comprises a lesser GFA of 30,924m² (and hence proportionately lesser impact).

Item 3

Should the construction of the development occur concurrently, please include detailed cumulative construction traffic and noise impact assessments in the Response to Submissions (RtS) report. The cumulative construction traffic impact assessment must include an assessment of impacts on safe and efficient operation of Wallgrove Road.

Applicant Response:

As detailed above, the cumulative traffic impacts from the concurrent development of the Stage 1 earthworks and the Stage 2 DHL warehouse construction can be considered consistent with the original SSD 5248 approval (as modified by Modification 1), and would have a similar or lesser cumulative traffic impact.

A detailed Construction Traffic Management Plan (CTMP) will be prepared for the proposed DHL Warehouse and Distribution Centre development on Lot 11/12 prior to construction certification as requested by TfNSW, with confirmation of projected traffic volumes pending engagement of a contractor and review of construction methodology and staging. The CTMP will review the cumulative construction impact resulting from concurrent bulk earthworks and DHL warehouse construction, proposing scheduling arrangements as appropriate to spread the traffic impact and minimise the impact, particularly during the road network peak hours.

Similarly, a Construction Noise and Vibration Management Plan has been prepared as part of the Stage 1 earthworks, which includes the concurrent consideration of earthworks and warehouse construction activities, and has been submitted to DPE in accordance with condition C60 of SSD 5248. The Construction Noise and Vibration Management Plan sets out that works would be limited to standard construction hours, and indicates that construction noise levels would comply with the 'Noise Affected' Noise Management Levels for all residential properties and would also comply with the Noise Management Levels for all non-residential properties.

2.2 Operational Traffic Impacts

Item 4

Section 7.2 of the Traffic Assessment only provides the estate-wide traffic volume as approved under SSD-5248-MOD-1. The Traffic Assessment does not provide an updated estate-wide traffic volume as proposed under SSD-5248-MOD-2 considering of the operational traffic volume estimate based on DHL existing operational traffic. Please revise the Traffic Assessment to include an estate wide traffic volume estimate.

Applicant response:

A comparison of the Estate-wide traffic generation, and the traffic generation of the proposed DHL site is provided in the following table. When comparing the Estate-wide traffic generation of the proposed MOD 2 master plan, the overall generation (based on theoretical rates) is identical to that of the approved MOD 1 master plan due to minimal differences in Estate GFA. This generation is also well below the original SSD approval (600 trips/hr in both peaks).

The forecast operational traffic of the DHL site is lower than that calculated based on the theoretical trip rates, with forecast peak trip generation of 42 (35) trips during the AM (PM) peak hour compared to the theoretical peak trip generation of 78 (58) trips during the AM (PM) peak hours.

As such, the Estate-wide trip generation, under the proposed MOD 2 concept plan and adopting the DHL forecast operational traffic, is lower than that of the approved MOD 1 concept plan.

For the purposes of retaining the estate-wide envelope of potential traffic movements, it is requested that the conceptual traffic generation of 540 trips/hour in the AM peak period and 398 trips/hour in the PM peak, as approved under Modification 1, remains as the benchmark under Modification 2 for future assessments.

TABLE 5 ESTATE-WIDE AND DHL SITE TRAFFIC GENERATION

	Trip Rate	Estate GFA	Trip Generation (veh trips / hour)		DHL GFA	Trip Generation (veh trips / hour)	
			AM	PM		AM	PM
SSD 5248	15 trips per developable hectare	40ha	600	600			
MOD 1	0.247 trips per 100m ² GFA (AM) 0.182 trips per 100m ² GFA (PM)	218,735m ²	540	398			
MOD 2	0.247 trips per 100m ² GFA (AM) 0.182 trips per 100m ² GFA (PM)	218,628m ²	540	398	31,720m ²	78	58
MOD 2 (with DHL forecast operational traffic)	0.247 trips per 100m ² GFA (AM) 0.182 trips per 100m ² GFA (PM)	218,628m ²	504	375	31,720m ²	42	35

Item 5

As per Fairfield City Council's advice, please provide a breakdown of the types of heavy vehicles accessing the site (12.5 m heavy rigid vehicles, 19 m semi-trailers, 26m B-double vehicles, 30m super B-Double vehicles etc.) and the expected daily and weekly movements of each.

Applicant response:

Ason has prepared a breakdown of the types of heavy vehicles proposed to access the site on a daily and weekly basis in **Attachment F**. In summary, daily movements of each vehicle type are estimated as follows:

- 5 rigid trucks (12.5m or shorter) movements per day.
- 73 articulated vehicles (12.5m to 19m) movements per day.
- 26 B-doubles movements per day.

It is estimated that weekend traffic generation will be approximately 20% that of weekdays (i.e. weekly generation = 5.4 x forecast daily traffic generation), which would lead to the following estimated movements per week:

- 27 rigid trucks (12.5m or shorter) movements per week.
- 395 articulated vehicles (12.5m to 19m) movements per week.
- 141 B-doubles movements per week.

30m Super B-Doubles are not scheduled to visit the site.

Item 6

Swept path diagrams show that heavy vehicles turning left to leave the site may need to negotiate with oncoming traffic and the proposed outbound driveway does not support 26m B-Double vehicles and 30m B-Double vehicles turning left out of the site simultaneously. Please clarify and amend the outbound driveway to provide sufficient splays avoiding conflicts of movements on estate roads.

Applicant response:

The Estate Road on the southern boundary of the site is not approved to be a public road and it is not intended to be a public road, meaning there is no basis for the Department or Council to have any concerns in relation to whether a turning truck existing the driveway would cross the centre line.

Notwithstanding this, Gazcorp has agreed to construct the Estate Road generally in accordance with public road standards. On this basis it is highlighted that AS2890.2:2018 allows for the design vehicles to take up most of the public road width when turning left into or out of the driveway on a minor road catering for Heavy Rigid Vehicles and Articulated Vehicles.

Even if it was a public road, the Estate Road is a cul-de-sac and only services low volumes of traffic limited to Estate traffic only (i.e. no external traffic is expected), and hence would be appropriately classified as a minor road under AS 2890.2:2018. Based on this, the swept path of the exiting 26m/30m B-doubles crossing the centreline is an acceptable manoeuvre. Furthermore, 20m semi-trailers (and by extension smaller trucks) which comprise most of the expected vehicle fleet visiting the DHL facility can exit from the western egress lane without crossing the centre line of the Estate Road.

Notwithstanding this, it is highlighted that the two lanes for exit are proposed for flexibility in design and facilitating better operational / maintenance outcomes through the life of the project. Simultaneous egress via both boom gates at the same time is not proposed and boom gates can be programmed to establish a nominated delay between the opening of adjacent boom gates. The maximum number of heavy vehicle outbound movements at any given time is 14 vehicle movements in an hour. This equates to less than 1 vehicle per 4 minutes. This is easily accommodated by a single boom gate and, as above, should vehicles exit via both boom gates, appropriate boom gate programming will avoid the incidence of simultaneous departures. This also means that the entire double driveway width is available for every turning movement (as there is no simultaneous turning movements from both boom gates) ensuring that drivers can safely access the Estate Road.

Further widening of the driveway to accommodate semi-trailer and B-Double egress from the eastern departure lane without crossing the centre line will require an excessive level of driveway width, which is unwarranted given the analysis provided above.

Item 7

The Department notes that truck exit driveway for Warehouse 10 and truck entry driveway for the proposed DHL warehouse are located side by side. The Department raised concerns about conflicts of movements between outbound trucks turning left leaving Warehouse 10 and inbound trucks turning right entering the DHL warehouse. Please clarify by providing a swept path diagram to demonstrate the conflict could be appropriately managed.

Applicant response:

Vehicles exiting Warehouse 10, and entering the Estate Road from the west, will need to give way to vehicles traversing the Estate Road, i.e., to vehicles entering the DHL warehouse on Lot 11/12 arriving from the east. This is a normal rule in relation to the function of any driveway connecting to any road whereby the vehicle exiting from the driveway must give way to the vehicle on the road. Only when the road is clear of traffic can the exiting vehicle proceed onto the road. As such, these movements are not in conflict in relation to the function of the Estate Road. It is also highlighted that the Estate Road is not approved to be a public road and is not intended to be a public road, meaning there is no basis for the Department or Council to have any concerns in relation to the operation of these driveways. To further reinforce the right-of-way, a Give Way sign and line marking can be installed at the Warehouse 10 exit driveway. As the estate will remain entirely owned by Gazcorp, the installation of suitable signage can be readily achieved when the warehouse on Lot 10 is built. It is highlighted that the signage and line marking at the Lot 10 exit is only intended to further reinforce the natural right-of-way pursuant to normal road rules, and is not intended to be the sole measure to avoid conflicting vehicle movements – of which the driveway design and separation already satisfactorily addresses.

Furthermore, as illustrated in the swept paths provided at **Attachment F**, entering trucks at Lot 11/12 are wholly contained within the DHL warehouse driveway and would not encroach or interfere or conflict in any way with vehicles waiting to exit from Warehouse 10 or any other aspect of the Lot 10 operation.

Items 8 and 9

The Department notes that the Swept Path Diagram (AG1877-04-v02) highlights loading docks to the west and east of the proposed warehouse would be used by 30 m super B-doubles side loading. Please detail loading dock management measures, including but not limited to side loading procedures, which docks would be made available for trucks arriving at the site when side loading is occurring, and whether there are sufficient docks available to compensate docks occupied by side loading docks.

The Department raises concerns about the potential queuing on Estate Road 1 in the event of trucks waiting for loading docks that are occupied by 30 m super B-doubles undertaking side loading. Please clarify the site's capacity of accommodating all trucks within the site boundary and avoiding queuing on Estate Road 1.

Applicant Response:

Detailed loading dock management procedures would be documented in a Loading Dock Management Plan, expected to form a condition of consent to be prepared prior to issue of the Occupation Certificate (OC).

Docks clouded in Sheet 2 of the swept path assessment (see the traffic response at **Attachment F**) are nominated to be kept vacant to accommodate side loading of B-Doubles when required.

Additionally, a first principles assessment for the loading dock turnover time had been prepared in Section 6.4.3 of the Transport Assessment provided at Appendix G of the EIS. Even accounting for the worst-case scenario whereby there are 2 B-doubles side loading (one on each side of the warehouse), and 8 of the loading docks need to be kept vacant, this leaves 23 loading docks which is more than sufficient to accommodate the forecast 9 rigid trucks / semi-trailers that would concurrently visit the site at the same time.

Should additional storage capacity be required, the site also has two staging locations (61.5 m long x 4m wide each) at the north of the site, allowing B-Doubles to temporarily park, out of the vehicular circulation path and loading areas, if they need to wait for the B-Double dock loading area to become available.

As such, there is sufficient loading dock capacity to accommodate the expected truck volumes and maintain all trucks within the site boundary and avoiding queuing on Estate Road 1 at all times.

Item 10

Please clarify the largest vehicles associated with operation of Lot 13 warehouses.

Applicant response:

The largest vehicle associated with operation of the Lot 13 is expected to be a 26m B-Double. This would be confirmed in a separate DA to be prepared for the Lot 13 warehouse, with accompanying swept path assessment as appropriate.

Item 11

The Department notes that the amended Concept Plan provides several driveways on estate roads within a short distance. For example, Lot 13 would have two car park driveways and one truck driveway on Estate Road 1. These driveways are side by side with each other and are close to the future South Link Road/Estate Road 1 intersection and Estate Road 2. Further, the car park driveway in Lot 14 is proposed immediately opposite the Lot 13 truck driveway on Estate Road 1. The busy access arrangement has the potential of giving rise to conflicts of movements and endangering traffic safety. Please consider whether the locations of the proposed driveways across the Estate are appropriate in the context of traffic safety.

Applicant Response:

The truck access driveway on the eastern side of Lot 13 has been refined to an exit-only driveway. Given the nature of the estate and that there is no through road, all trucks existing Lot 13 would be expected to turn left, meaning this exit driveway would be used almost exclusively as a left out driveway, significantly reducing the potential for vehicle conflict on the estate road. All other driveways are light vehicles / cars only.

It is also highlighted that Lots 13 and Lot 14 are currently undergoing further design amendments in preparation of detailed buildings approvals process. This will include further consideration of the traffic management arrangements

for each lot. These design amendments are not expected to influence the design or operation of the proposed DHL warehouse on Lot 11/12.

2.3 Operational Noise Impacts

Items 12 – 15

Please provide clarification of seasonal variations and their impacts on the recorded background noise levels in accordance with the Noise Policy for Industry 2017.

In the RtS report, please provide a description of the following matters in accordance with the Approved methods for the measurement and analysis of environmental noise in NSW (NSW EPA, 2022): – the time, date, location, and the surrounding area – the prevailing conditions, including meteorology, observed during the background noise measurements – the acoustic environment during the measurement period, including the dominant noise sources and events that likely controlled the LAFmax descriptor – observations of the noise environment including frequency and extent of any extraneous noise – any adjustments made to the measurements, with full justification and supporting information provided.

Locations of recording background noise levels described in the Noise Impact Assessment (NIA) for Roberts Road Data Centre (SSD-10330) are identical to the three locations reported in the NIA for SSD-36156297. However, the recorded background noise levels included in the SSD-36156297 NIA is higher than those in the SSD-10330 NIA. Please provide justifications for the differences taking the listed factors in question 10 into account.

Tables 1, 2, and 3 of the Environmental Noise Impact Assessment (ENIA) shows background noise levels recorded during January 2022. However, Appendix A of the ENIA includes background noise data recorded between 12 and 26 October 2021. Please explain the discrepancy and update the report to provide consistent background noise levels.

Applicant response:

Items 12-15 relates to queries identified by the Department of Planning and Environment in relation to the measured background noise levels. The measured background noise is relevant as it is used to establish the project-specific noise trigger levels against which the proposed development is assessed, in accordance with the EPA's Noise Policy for Industry. In this regard, it is highlighted that the Department of Planning and Environment has suggested that a more conservative and appropriate background noise level was previously measured by SLR in August 2019 at 106 Burley Road, Horsley Park, as part of a noise assessment carried out for SSD-10330. SLR measured lower background noise levels of 38 dBA, 36 dBA and 36 dBA for the daytime, evening and night time periods respectively – which are lower than the background noise levels measured by Acoustic Logic. Acoustic Logic has prepared a revised Environmental Noise Impact Assessment for the proposed development, which has been based on the suggested SLR background noise levels, thereby resulting in more stringent project specific noise trigger levels. The revised Environmental Noise Impact Assessment is provided at **Attachment G**, and the use of the background noise levels recommended by the Department of Planning and Environment is considered to address the issues raised in items 12-15.

Item 16

The Environmental Noise Impact Assessment does not include a breakdown of types of heavy vehicles which are themselves have different sound power levels. Please provide a breakdown of types of heavy vehicles consistent with that of the Traffic Assessment and an amended modelling of operational noise emissions based on various Sound Power Levels of different vehicles

Applicant response:

The revised Environmental Noise Impact Assessment provided at **Attachment G** includes at Table 10 a breakdown of the sound power level for each of the heavy vehicles that will be used on the site – including articulated vehicles and rigid trucks. The noise model also accounts for trucks reversing slowly through the loading dock areas, with reversing safety beeps, as well as noise from light vehicles and forklifts. The Source Model is shown in Figure 4 of **Attachment G**, which illustrates the location of each noise source, and has allowed for 2 simultaneous reversing truck movements as well as forward truck movements and forklift noise.

Item 17

Table 14 of the Environmental Noise Impact Assessment provides the assumed operational noise levels of semi-trailers and medium rigid dual axle trucks travelling on Wallgrove Road and manoeuvring within loading docks. It, however, omits the operational noise levels of these vehicles travelling on estate roads. Please update the ENIA to provide the operational noise levels of these vehicles travelling on estate roads and an updated operational noise levels prediction.

Applicant response:

Section 10 of the revised Environmental Noise Impact Assessment provided at **Attachment G** includes an assessment of the combined noise associated with on-site operational activities (including on-site truck and forklift movements), light vehicle movements, trucks moving along the internal estate road as well as estate trucks travelling along Wallgrove Road. The combined cumulative assessment indicates that the site would comply with the noise trigger levels for the daytime, evening and night time periods.

Item 18

The modelling in the ENIA does not take various loading activities including reserving in, siding loading, and protentional forklift movements external to the warehouse into account. Please update the modelling by properly categorising all movements in loading areas and providing noise generation from these movements.

Applicant response:

The revised Environmental Noise Impact Assessment provided at **Attachment G** includes at Table 10 a breakdown of noise sources in the noise model, including forklift movements and trucks reversing slowly through the loading dock areas, with reversing safety beeps. The Source Model is shown in Figure 4 of **Attachment G**, which illustrates the location of each noise source, and has allowed for 2 simultaneous reversing truck movements as well as a forklift on the eastern and western side of the building.

2.4 Hazards and Risks

Item 19

From section 3.3 of the PHA, it is noted that the Retail Distribution Centre (RDC) section of AS 3833 appears to be the primary DG-related standard with regards to the DHL warehouse design. Apart from the provided justification that DGs will ultimately be contained within consumer retail packaging of relatively small volumes, it remains uncertain why the DG class- specific standards have not been applied, especially in noting that:

- a. these individual consumer retail packaging are bundled into large pallet sizes, received to site and stored in this manner;*
- b. these pallets will be stored in high bay racking to accommodate large overall storage quantities (i.e., 200 tonnes for DG Class 3 flammable liquids. Why AS 1940 is not applied?); and*
- c. the maximum DG storage quantity is 520 tonnes which is relatively large (i.e., the AQR contribution from DG Classes 2.1, 5.1 and 6.1 alone exceeds 50%. Why are the relevant DG class-specific standards not applied, including and not limited to, AS 2118 and FM Global 7-31/NFPA 30B for aerosols?).*

As such, further justification is required to verify if the warehouse can be operated safely if AS 3833 with it flow-on standards appear to be the lone consideration with regards to warehouse design. The controls in the relevant DG class-specific standards should be examined, especially DG compartmentalisation when designing DG storage at such a scale (e.g., caging for aerosols, fire protection barriers for flammables, segregation, etc). It should be noted that the choice of an appropriate standard is likely to have implications on the Fire Safety Study and FRNSW's view on the study.

Applicant response:

A specific response has been prepared by Riskcon, which is proved along with the updated Preliminary Hazards Analysis at **Attachment H**. In summary, AS/NZS 3833:2007 has been selected as the appropriate standard because it is the most applicable to the storage of the commodities based upon their package sizes, and in particular because it has been designed specifically for retail distribution where packages are for retail use (i.e. small packages).

Item 20

PHA Table 3-1 identified DG Classes 5.1 oxidising agents and 6.1 toxic substances, up to 50 tonnes each. However, these materials are not identified in the site layout in PHA Figure 3-2. Moreover, section 4.3 of the PHA does not appear to consider scenarios which are specifically relevant to these materials. As such, further justification is required to verify if the scenarios in PHA Section 4.3 appropriately captures the range of consequences which could arise from these materials. For example:

- a. given that the specific storage location of DG Class 5.1 remains uncertain, would a fire involving this material extend the consequence distances of the currently reported fire scenarios (i.e., a more severe fire due to involvement of oxidising agents)?
- b. would an incident involving DG Class 6.1 (fire, release or otherwise) would result in toxic compounds other than those listed in PHA Table 5-4? The range of DG Class 6.1 materials should be considered to justify the potential compounds within the toxic plume (pesticides, etc).

Applicant response:

A specific response has been prepared by Riskcon, which is proved along with the updated Preliminary Hazards Analysis at **Attachment H**. In summary, the updated Preliminary Hazards Analysis includes at Figure 3-2 the location of each of the Dangerous Goods to be stored within the warehouse, and includes assessment of the scenarios relevant to the Class 5.1 oxidising agents and Class 6.1 toxic substances. The main risk posed by these products is that they can spill resulting in site contamination. This particular aspect has been discussed in Sections 4.19 and 4.10 of the Preliminary Hazards Analysis. They could also be involved in a fire which may result in a toxic smoke dispersion which has been discussed in Section 4.8 of the Preliminary Hazards Analysis.

Item 21

PHA Figure 5-3 illustrates a 23 kW/m² heat radiation contour for full warehouse fire. However, PHA Table 5-3 specifies that that heat radiation for full warehouse fire does not exceed 20 kW/m² based on the specified research reference. We consider the reported results for full warehouse fire in PHA Figure 5-3 and Table 5-3 to be inconsistent despite the quoted reference. As such, further details on these results are required to resolve this inconsistency.

Applicant response:

A specific response has been prepared by Riskcon, which is proved along with the updated Preliminary Hazards Analysis at **Attachment H**. In summary, the updated Preliminary Hazards Analysis includes revised impact distances and discussion at Section 5.4, and additional frequency analysis in Section 6.7, and revised conclusions. The highest risk remains within the permissible criteria and therefore all other risk points beyond the boundary would be within the acceptable criteria.

Item 22

Continuing from item 3 above with regards to the modelling of heat radiation impacts from full warehouse fire, it is understood that the heat radiation contours in PHA Figure 5-3 were generated from the inputs and assumptions in PHA Appendix Figure B-6. However, these inputs and assumptions have not been appropriately justified. For example:

- a. assuming an area of 18,200 m², burning rate of 0.054 kg/m² and 100 tonne quantity without due reference to the total quantity of DG stored, the areas designated for DG storage and overall warehouse area. It is noted that these values are similar to SSD 33701741 – Woolworth Wyong Regional Distribution Centre Expansion despite the DHL warehouse being larger in total quantity of DG stored, DG stored closer to each other and non-DG, and larger overall warehouse area; and
- b. specifying diesel as the representative species to be modelled without due consideration to item 4a above. It is noted that SSD 33701741 – Woolworth Wyong Regional Distribution Centre Expansion specified crude oil (i.e., more flammable compared to diesel) despite the DHL warehouse being larger in total quantity of DG stored and more flammables being stored.

As such, further details are required to appropriately justify the inputs and assumptions in PHA Appendix Figure B-6 specific to the DHL warehouse.

Applicant response:

A specific response has been prepared by Riskcon, which is proved along with the updated Preliminary Hazards Analysis at **Attachment H**. In summary, Riskcon advise that the modelling remains accurate on the basis that the

actual mass input into the model is unrelated to how the model is calculating the radiant heat (i.e. the radiant heat is based upon surface area) so how much mass input won't change the results. Further, an additional table has been included in Appendix B6 of the updated Preliminary Hazards Analysis to estimate the average burning rate of products for the full warehouse fire. The analysis showed an average burning rate of 0.046 kg/m².s; hence, the selection of 0.054 kg/m².s is conservative.

Item 23

PHA Appendix Figure B-9 describes the input and assumptions to estimate the consequences of toxic releases from a full warehouse fire. As indicated in item 20(b) above, it is uncertain if the input and assumptions appropriately considers the range of DG Class 6.1 toxic substances in the DHL warehouse. Like issue 22 above, these inputs and assumptions have also not been appropriately justified. For example:

- c. how the total source mass of 5,700 tonnes was estimated and how this mass links with the burning rate of 0.054 kg/m², provided that the burning rate is appropriately justified as per item 4a above?*
- d. how the fire surface area of 18,200 m² was estimated in view of item 22(a) above?*
- e. why and how D3 was assumed for atmospheric conditions for plume modelling?*

As such, further details are required to appropriately justify the inputs and assumptions in PHA Appendix Figure B-9 specific to the DHL warehouse.

Applicant response:

A specific response has been prepared by Riskcon, which is provided along with the updated Preliminary Hazards Analysis at **Attachment H**. In summary, the updated Preliminary Hazards Analysis includes revised calculations in Appendix B based on new assumptions

- a. 40,000 pallet spaces holding 400 kg each resulting in a mass of 16,000,000 kg.
- b. Area adjusted to 19,800 m².
- c. F1.5 conditions to be conservative.

It is noted that the burning rate isn't used in this model.

Item 24

Although not specified in PHA Table 3-1, please clarify if C1 combustible materials will be stored within the DHL warehouse and if so, provide sufficient details on its storage to justify that the consequences from all scenarios in PHA Section 4.3 and additional scenarios which may be considered to address item 1 above, if any, will not be more severe than the estimates reported in the PHA.

Applicant response:

No Class C1 Combustible Liquids are proposed to be stored at the site.

2.5 Biodiversity Development Assessment Report (BDAR)

In accordance with s 7.9(2) of the Biodiversity Conservation Act 2016 (NSW), please submit a BDAR waiver request as part of the RtS report.

Applicant response:

A BDAR Waiver was submitted on 28 February 2022. As requested by the Department of Planning and Environment, a revised BDAR Waiver Request has been prepared, and is attached at **Attachment J**.

3.0 Additional Environmental Assessment

Additional environmental assessments have been prepared in response to the issues raised in submissions. These include the following assessment reports:

- Revised Stormwater Management Report for the entire Gazcorp Estate (in support of SSD 5248 Mod 2) provided Lot 11/12 (in support of SSD 36156297) provided at **Attachment C1**, which demonstrates that the discharge criteria for the entire estate can still comply with Council's peak flow and water quality targets, and is consistent with the previously approved Stormwater Concept Plan under SSD 5248.
- Revised Stormwater Management Report for Lot 11/12 (in support of SSD 36156297) at **Attachment C3**, which demonstrates that the discharge criteria for the entire estate approved under SSD 5248 can still be met with the revised civil design for Lot 11/12. An OSD and water quality operations maintenance manual is also provided at **Attachment C4**.
- Revised swept path assessments for heavy vehicles through the DHL site and the broader estate, provided at **Attachment F**. The revised swept path assessments demonstrate that the site and the estate can be accessed by the largest design vehicle, being a 26m B-Double, as well as a 30m Super B-Double (which is not proposed to be used at the site but for which the site has been sensitivity tested against). Swept paths for a 26m B-Double and a 30m Super B-Double are provided in **Attachment F**.
- Revised Environmental Noise Impact Assessment provided at **Attachment G**. The revised Environmental Noise Impact Assessment includes:
 - New background noise levels as requested by the Department of Planning and Environment leading to more stringent noise criteria for the proposed development.
 - Additional details in relation to noise sources and associated sound power levels for the noise modelling scenarios.
 - Additional noise modelling scenarios, including a cumulative scenario with estate-wide warehouse activities, on-site truck movements, trucks travelling on the internal estate road and trucks traveling on Wallgrove Road.The revised Environmental Noise Impact Assessment demonstrates that the noise criteria can be achieved, and makes no changes to the original recommendations in relation to noise insulation of the warehouse buildings, and minimisation of truck noise through limiting the use of exhaust brakes and turning trucks off in the loading dock rather than letting them idle.
- Revised Preliminary Hazards Analysis provided at **Attachment H**. The revised Preliminary Hazards Analysis includes revisions to address specific queries raised by the Department of Planning and Environment. Based on the analysis conducted, it is concluded that the risks at the site boundary are not considered to exceed the acceptable risk criteria; hence, the facility would only be classified as potentially hazardous and would be permitted within the current land zoning for the site. The revised Preliminary Hazards Analysis includes the same recommendations in relation to managing spills and preventing the discharge of potentially contaminated firefighting water in the event of a fire.
- An Operational Air Quality Impact Assessment has been prepared by SLR and is provided in **Attachment I**. The Operational Air Quality Impact Assessment includes a qualitative assessment of air and odour emissions associated with the operation of the warehouse and distribution centre, and concludes that the potential for offsite air emissions from the operation of the facility is 'neutral', and the potential for offsite odour impacts from the operation of the facility is 'negligible'.
- A revised Ecologically Sustainable Development (ESD) Report has been prepared by Figtree Consult Sustainability and is provided in **Attachment K**. The revised ESD report sets out revised sustainability objectives for the proposed DHL facility, whilst ensuring that the proposal remains consistent with the estate-wide Sustainability Strategy prepared under Condition A12 of SSD 5248.

No revised assessment reports were required as a result of the project amendments, noting that the building has not noticeably changed in terms of bulk and scale compared to what was originally exhibited, and the numerical aspects of the proposed development have reduced or stayed the same.

4.0 Mitigation Measures

No changes to the mitigation measures set out in the EIS are considered necessary. However, with consideration of concerns raised by Council and the Department in relation to the design of the Estate Road, Gazcorp will carry out a Road Safety Audit by an Accredited Road Safety Auditor as a part of the detailed design process for the construction of the Estate Road, and would implement revisions to the design of the Estate Road in accordance with recommendations from the Road Safety Auditor to the extent that those recommended design changes are reasonable and practicable.

5.0 Conclusion

DHL proposes to develop the site in accordance with what was envisaged in the conceptual approval under SSD 5248 (as previously modified). An EIS has been prepared to consider the environmental, social and economic impacts of the proposed development. The EIS was publicly exhibited, and submissions have been received from Fairfield City Council and a number of agencies.

DHL has proposed amendments to the project, in part to address issues raised in submissions, but also to manage projected increases in the overall construction costs. This letter comprises a Response to Submissions and a Project Amendment Report, providing a description of the proposed amendments to the project, providing a response to all of the issues raised in submissions, and providing further environmental assessment where necessary.

Having regard to relevant biophysical, economic and social considerations, including the principles of ecologically sustainable development, the carrying out of the project continues to be justified for the following reasons:

- The proposal is permissible with consent and meets the requirements of the relevant statutory planning controls.
- The proposal is consistent with the principles of ecological sustainable development as defined by the EP&A Regulation.
- The proposal contributes to the vision and objectives of the Western Sydney Employment Area, and will not result in any unacceptable adverse impacts on existing and future surrounding buildings and uses.
- The development establishes a building form with appropriate scale and massing that responds to the site's setting and topography.
- The proposed development will not result in any significant adverse impacts on local flora and fauna.
- The traffic network is being upgraded by Gazcorp under SSD 5248 and will have sufficient capacity to cater for the proposed development.
- The proposed development will not result in any unacceptable adverse amenity impacts on nearby rural residential properties.
- The proposal is capable of being adequately serviced with potable water and stormwater infrastructure and electrical and communication services.
- The proposed development will form part of a major new employment area in Western Sydney and will deliver significant economic benefits to region.

Overall the proposal will facilitate employment generating development at a suitable scale as envisaged in the concept approval, and will assist in repurposing this strategically significant site within the WSEA in-line with the desired outcome for the area. The proposal will provide much needed buildings and infrastructure in support of Sydney's logistical supply chain, contributing to enhanced warehousing and distribution capacity, as well as providing for the orderly and efficient use of land. This will also assist in achieving employment forecasts for western Sydney and contribute the delivery of a 30-minute city. Furthermore the proposal, with the implementation of proposed mitigation measures will not give rise to detrimental impacts. On this basis, we have no hesitation in recommending the proposal be approved.