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23 September 2019

Mr Chris Wilson
Commissioner
Independent Planning Commission NSW
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Wilson,

**Gazcorp Industrial Estate, 813-913 Wallgrove Road, Horsley Park
State Significant Development SSD 5248**

I refer to the meeting between the Independent Planning Commission and Gazcorp 19 September 2019, relating to the proposed development of an industrial estate at 813-913 Wallgrove Road, Horsley Park (SSD 5248). At the meeting the Commission raised questions which were taken on notice by Gazcorp. Responses to these questions are provided below.

Perimeter road noise modelling assumptions

Question: The Commission inquired what assumptions had been made in the noise modelling in relation to use of the Stage 1 building perimeter access road by trucks.

Answer: The Noise Emission Assessment for Stage 1 is provided at Appendix Q2 of the EIS, and includes a SoundPlan Model at its Appendix 2. The Soundplan Model identifies the noise sources that were used for the noise assessment, and shows a 'line source' around the internal road surrounding the building for both the 'day and evening period' and 'night period' scenarios. This 'line source' represents a moving vehicle travelling along this internal road. This is consistent with the intended use of the site – that is, that heavy vehicles will load/unload around the loading dock areas, but may use the perimeter road for efficient egress on arriving or exiting the site. Note that the Soundplan Model also shows 'line sources' for the truck turning movements around the loading docks on the eastern side of the building.

Stormwater management system

Question: The Commission inquired what systems would be in place to protect Reedy Creek from petrol leak or spill.

Answer: The Stormwater Concept Plan was amended as part of the Response to Submissions Report, and is provided at Appendix G3 of the Response to Submissions Report. Hydrocarbons were not identified as a key pollutant of concern in the stormwater assessment because hydrocarbons are normally only a key issue for developments that involve the storage or handling of hydrocarbons (e.g. petrol stations). In this case, no storage or handling of hydrocarbons is proposed. Further, MUSIC Modelling, which is used to analyse the effectiveness of the proposed stormwater management system in relation to the quality of stormwater being discharged, cannot model the removal of hydrocarbons. Rather, for a project of this nature 'gross pollutants' (i.e. rubbish) are able to be assessed, and a 90% reduction of 'gross pollutants' is required to be achieved through treatment. Gross Pollutant Traps (GPTs) will be incorporated into the treatment train for Stage 1 as specified in the Stormwater Concept Plan to achieve this target.

Certain types of GPTs can also remove sediment and hydrocarbons from stormwater runoff. With this in mind, we note that Condition 46 of the proposed development consent requires Gazcorp to "...design, install and operate a stormwater management system...designed by a suitably qualified and experienced person whose appointment has been endorsed by the Planning Secretary... [and is]

prepared in consultation with Council.” The selection of the GPT is therefore part of the detailed design, and (pursuant to Condition 46) must be selected in consultation with Council by a suitably qualified person endorsed by the Department. In this context, we note that, subsequent to the Stormwater Concept Plan being prepared (in 2015), Council issued a Stormwater Management Policy (2017), which specifies that industrial developments of the scale proposed by Gazcorp must provide a device that specifically targets the removal of hydrocarbons from the treatment train. In light of Council’s new policy, Gazcorp expects that a GPT capable of removing hydrocarbons would be stipulated by any suitably qualified person and mandated by Council through the detailed design consultation process. Gazcorp would be satisfied with this outcome, and, to avoid any doubt, is willing to commit to ensuring a suitable device capable of removing hydrocarbons is selected.

We also note that the discussion in the meeting included reference to the storage of Dangerous Goods and the potential for contaminated fire fighting water. In this regard, it is confirmed that the Stormwater Concept Plan did not take into account fire fighting water. This is not unusual, since the need to consider fire fighting water is only a requirement for potentially hazardous facilities where there is the potential for fire fighting water to become contaminated with the Dangerous Goods stored/used at the site. It is standard practice to not require fire fighting water to be addressed where a facility is not potentially hazardous and does not include the storage or use of Dangerous Goods. The proposed development consent recommended by the Department contains a condition of consent requiring that any storage of Dangerous Goods remains below the thresholds set out in the Department’s Applying SEPP 33 guideline. If Gazcorp (or a future owner or tenant) wish to store or use Dangerous Goods above the thresholds then either a new development application (or a modification of the development consent) would be required, and the management of fire fighting water would need to be considered as part of that application in accordance with the relevant guidelines and in consultation with Fire and Rescue NSW.

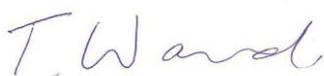
It is therefore considered that the Stormwater Concept Plan proposed by Gazcorp is suitable for the proposed Stage 1 development, and that the recommended conditions of consent are satisfactory in relation to ensuring the stormwater management system will prevent water pollution.

Condition B4: Traffic and Access

A matter overlooked in our briefing meeting relates to the specific wording of Condition B4. Page 35 of the Department’s assessment report states that the “traffic assessment will need to verify future developments are consistent with the traffic volumes for the Concept Proposal.” Gazcorp are happy with this intention, but note that Condition B4 includes more generic requirements for future traffic assessments. It is requested that the Commission include the words from the Department’s assessment report into Condition B4 to ensure that future traffic assessments are clearly intended to be compared against the traffic movements already assessed as part of the Concept Proposal. This is important because the Stage 1 infrastructure upgrades to Wallgrove Road have been designed to accommodate the full traffic load from the entire Gazcorp industrial estate as described in the Concept Proposal.

I trust that the above information provides sufficient clarifications to address the Commission’s questions. If you have any further questions or would like any additional information, please do not hesitate to contact me.

Yours sincerely,



Tim Ward
Director, Planning
02 9956 6962
tward@ethosurban.com