



Your ref: SSD 17352813
File no: MC-21-00001

16 November 2021

NSW Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Recipient Delivery David.Koppers@planning.nsw.gov.au

Attention: Mr Koppers

Dear Mr Koppers

**SSD 17352813– Huntingwood Processing Facility Expansion – 65
Huntingwood Drive, Huntingwood**

Thank you for your correspondence dated 15 October 2021 requesting our advice for the above matter.

We have reviewed the proposal and we object to it until our issues listed in the attachment to this letter have all been addressed.

We request that the information responding to these issues be referred back to us for consideration and the nomination of conditions, before any final determination of this application is made by the Department.

If you would like to discuss this matter further, please contact Judith Portelli, our Manager Development Assessment, on 9839 6228.

Yours faithfully

Peter Conroy
Director City Planning and Development

Connect - Create - Celebrate

Council Chambers - 62 Flushcombe Road - Blacktown NSW 2148

Telephone: (02) 9839 6000 - DX 8117 Blacktown

Email: council@blacktown.nsw.gov.au - Website: www.blacktown.nsw.gov.au

All correspondence to: The Chief Executive Officer - PO Box 63 - Blacktown NSW 2148

Blacktown Council's submission to SSD 17352813 – Huntingwood Processing Facility Expansion

1. Drainage Engineering Issues

On-site Stormwater Detention

- a. Provide an On-Site Detention catchment plan of the existing On-Site Detention and the proposed On-Site Detention catchment. Considering the existing primary On-Site Detention is to be demolished the pre to post catchment should match. While the areas have been clearly stated in the integrated water report there is no catchment plan associated with this. The report and plans currently do not match and has to be fixed.
- b. The On-Site Detention is to apply to all the development. Any bypass is to be clearly hatched and areas stated. Provide a separate On-Site Detention catchment plan, separate to the water quality catchment plan. Rename plans to suit.
- c. The On-Site Detention calculation spreadsheet require that the 'obvert of pit outlet pipe' be 55.95 and not 55.23 based on a 1050mm pipe. This will result in slight orifice drowning. Review the spreadsheet.
- d. The base of On-Site Detention can be 1% slope minimum to assist in achieving volumes.
- e. Ancillary buildings and all buildings such as processing building (BLDG), storage shed, silo 1 and 2 etc must be included for On-Site detention of stormwater.
 - If new buildings (ancillary) are built over existing impervious areas and are discharging to existing ancillary On-Site Detention systems that are not demolished then they can maintain status quo provided that proof of existing ancillary On-Site Detention is supplied to Council in the form of a report and survey with drainage lines verified to lead to existing On-Site Detention.
 - Where On-Site Detention does not exist or does not cater for the extra development then On-Site Detention applies.
 - Where new buildings are proposed over pervious areas then compensatory On-Site Detention volumes will apply as a pre to post development model would have applied at the time of constructing the site.
- f. Provide details of the first flush pit (this is to be sealed)
- g. Uncovered (no roof above) On-Site Detention area is to be considered bypass for water quality.

Water Quality

- a. Water Quality applies to all the development including ancillary buildings such as 'processing building (BLDG)', storage shed, Silo 1 and 2. This is independent of On-Site Detention requirements. Further details are to be provided regarding water quality for the aforementioned buildings.

- b. It appears that on Dwg. DA4301 ancillary catchment (1790 + 313m2) are unaccounted for. These are to be either treated or considered as bypass for Water Quality. Confirm water quality approach regarding the ancillary catchment (1790 + 313m2) as shown on Dwg. DA4301.
- c. Model for Urban Stormwater Improvement Conceptualisation 'X' is not yet supported and a standard Model for Urban Stormwater Improvement Conceptualisation model is to be submitted.
- d. Ensure Model for Urban Stormwater Improvement Conceptualisation model matches the plans in terms of names, abbreviations, areas and land use.
- e. Label each sub-catchment on Dwg. DA4301 i.e. on top of the hatchings for ease of identification.
- f. Provide information on the total catchment area for 'SF1, SF2, bypass for water quality.
- g. Jellyfish calculations, detailed drawings, levels and splitter pits are to be provided to as per the Water sensitive urban design developer handbook chapter 12.13.
- h. All pits with OceanGuards are to be clearly noted on the plan.

Submission

- a. Submit amended plans, Model for Urban Stormwater Improvement Conceptualisation (standard) model and updated Integrated water management report.

17 November 2021

TfNSW Reference: SYD21/00469/03

Client Reference: SSD-17352813

Director
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: David Koppers

**EXHIBITION OF EIS - HUNTINGWOOD PROCESSING EXPANSION - 65
HUNTINGWOOD DRIVE, HUNTINGWOOD**

Dear Sir/Madam,

Reference is made to Department of Planning, Industry and Environmental (the Department)'s correspondence dated 19 October 2021, regarding the abovementioned Application which was referred to Transport for NSW (TfNSW) for comment.

TfNSW has reviewed the submitted information and requests that the following requirements are included in any consent issued to this application:

1. Transport for NSW (Roads) has previously acquired a strip of land (known as Lots 7 and 8 DP 244378) for road along the Brabham Drive frontage of the subject property, as shown by the blue colour on the attached Aerial – "X". TfNSW has also previously resumed and dedicated a strip of land as road along the Brabham Drive frontage of the subject property, as shown by the grey colour on the attached Aerial – "X".

The subject property also abuts a Declared Motorway (M4 Western Motorway) as shown by the blue colour and green hatching on attached Aerial – "Y". Access is denied across this boundary.

All buildings and structures, together with any improvements integral to the future use of the site are wholly within the freehold property (unlimited in height or depth), along the M4 Western Motorway boundary

2. Prior to the issue of the first Occupation Certificate, the applicant should prepare an updated Green Travel Plan in consultation with and endorsed by TfNSW. The Green Travel Plan should be submitted to development.ctmp.cjp@transport.nsw.gov.au.
3. The Construction Traffic Management Plan (CTMP) detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be prepared and submitted to the Department for approval prior to the issue of a Construction Certificate. The CTMP must be in consultation with Council and be endorsed by Council and TfNSW. The document can be submitted to TfNSW via the email: development.ctmp.cjp@transport.nsw.gov.au.

TfNSW also provides the following comments for the Department's consideration in the determination of the application:

1. The proposed "KEEP CLEAR" marking at the driveway does not meet the requirements set out in the Transport Delineation Guidelines, and should not be used for private driveway / access.
2. To encourage the use of active transport and public transport, the following mitigation measures could be considered:
 - Improvement of bus stop amenities by providing shelter and seating at the bus stops in close vicinity to the subject along Huntingwood Drive.
 - Provision of shared path infrastructure along Brabham Drive.
 - Provision of pedestrian refuge and pram ramp for the north and east legs of the Brabham Drive and Huntingwood Drive intersection.
3. According to the construction staging plan, the existing staff car park would become unavailable during construction. Further parking study should be required to identify the potential parking shortfall during construction.
4. It is understood that the traffic to and from the site mainly use the Great Western Highway intersections with Brabham Drive and Huntingwood Drive. Therefore, further assessment should be undertaken to gain the appreciation of the performance of these key intersections along Great Western Highway intersections and the impact of the proposed development on the classified road network.
5. The outbound construction vehicle haulage route in Figure 14 of the Transport Impact Assessment is incorrect. It should be noted that there is no southbound on-ramp from Great Western Highway into Westlink M7. The diagram should be updated with proper haulage route.
6. The updated GTP should be updated to include the following improvements be made to increase the efficiency of the GTP to promote sustainable transport options for staff and visitors to and from the proposed development:
 - **Objectives:** The updated GTP should be updated to implement both short and long term measures that will ensure non-private vehicular modes of transport are the preferred mode of travel to/from the project site. The final GTP should include objectives to reduce the proportion of single-occupant car travel by staff and visitors to and from the site. TfNSW recognises the GTP has a car-pooling initiative and would recommend this be extended to visitors on the site. TfNSW also recommends a shuttle service from Blacktown Station be considered (there may need to be several shuttles operating at once to move increased staff 24/7). The aim of the GTP objectives should be to increase active and public transport mode share for the life of the development.
 - **Mode share targets:** TfNSW recommends that the GTP adopt mode share targets for sustainable transport active and public transport that should be determined by a qualified traffic consultant for the GTP. Car-pooling and shuttle bus services to and from train stations have also been proposed here as well as bus + train options.

Mode type – Proposed	Current mode share	TfNSW proposed mode share
Private vehicle as driver	90%	70%
Car as passenger	4.4%	10%
Bus + train	0%	10%
Shuttle bus	0%	10%

- The proposed mode shares above should be used in the **Implementation Strategy**. The other longer term goals in this section should be implemented in the GTP just prior to and during public and active transport infrastructure being made available.
- **Travel Coordinator and committee:** TfNSW advises you that often the Travel Plan Coordinator will need a team or committee to ensure all of the actions of the STP are done. The GTP cannot be at the discretion of site management to get the responsibilities of the GTP implemented. The applicant will need to determine a strategy for the tenant(s) to take over the ongoing responsibilities for the GTP, making it clear to the tenants that there are requirements to try and achieve sustainable transport mode shares for the site, as a condition of the development, for its lifecycle.
- **Travel Access Guide (TAG):** A TAG document should be included as part of the GTP. The TAG should include the short term initiatives discussed earlier (shuttle and car pooling), and removes the cycling option as it is currently unsafe. The longer term TAG can be updated once public and active transport infrastructure are upgraded. The TAG will need the following:
 - Provide information on the TAG advising staff and visitors that additional information about bus and train routes and timetables are available on the Trip Planner at transportnsw.info/
 - Provide location of bike parking facilities, change rooms and showers for staff and locate on TAG.
 - Provide details on car-pooling how staff can get involved, and also shuttle bus times and stop location on TAG map.
- **Travel Survey:** A travel survey should be undertaken to identify the current travel behaviour and the goal to promote these options of the shuttle and the car pooling scheme. And the travel survey should be updated longer term to reflect changes to public and active transport.
- **Parking management strategy** – A parking management strategy should be implemented in the updated GTP to prioritise the parking spaces by staff and visitors on a need basis, and actively encourages staff and visitors using sustainable transport options that are available to and from the site. This will include how car parking onsite will be limited and managed at the site.
- **Funding the GTP:** The GTP should be appropriately funded and otherwise resourced, by the proponent, for a period of at least 5 years, or via an appropriate appointed entity, such as a body corporate. This will include ongoing travel demand initiatives that will require resourcing. This is in recognition that any travel demand management interventions will need to be significant in scale to be effective. This should be covered in the updated GTP Implementation Strategy.
- **Implementation Strategy:** The implementation strategy should be prepared, including all of your initiatives and incentives, timing and completion dates, your communications tasks to promote the initiatives, and who will do the tasks, timing

of tasks to be completed; this will ensure the overall effectiveness of the GTP. The **Implementation Strategy** should:

- Identify the party or parties responsible for delivery and implementation of each element of the updated GTP throughout various stages of the development lifecycle, including for its ongoing implementation, monitoring and review, for a period of at least 5 years post-OC;
- Be updated both on an annual basis, and when future transport services and pathways eventuate. Your stakeholder engagement strategy will be included in this (including all of your stakeholders, key messages and the channels you will use to engage your stakeholders) – please find our link for **Potential engagement techniques** that may be useful to you.
- **Strategies and initiatives:** The updated GTP will need to identify and implement planned strategies and initiatives in your **Implementation Strategy** that will reduce the proportion of single occupant car travel to/from the site and increase the use of public and active transport by staff to and from the site. These include options of shuttle buses to and from the site (24/7) a car-pooling scheme, as well as promoting buses within walking distance of the site, making sure the initiatives are updated longer term in the GTP to reflect changes to public and active transport. Some additional **incentives (both long and short term) are provided here:**
 - Pre-loaded opal cards when staff first occupy the site.
 - Staff that are committed to public transport receive subsidised panniers or backpacks.
 - Wayfinding at the site for End of Trip facilities such as bicycle facilities, change rooms and showers.
 - Incorporating a role for a GTP sustainable travel champion that focuses on modelling the desired behaviours and positive communication around active and public transport.
 - Implementing a car-pooling scheme with guaranteed ride home. Online car sharing systems for staff, operating across an entire precinct to maximise access to possible rides and build community spirit. This could include discounted membership of car share clubs.
- **Data** – The GTP must be updated to include available data that identifies the travel behaviours of site users to measure and monitor the effectiveness of the objectives and mode share targets of the GTP. These include:
 - Weekly rates of car pooling
 - Weekly car park usage rates
 - Shuttle trips to and from the site
 - An additional weekly report of patronage be included in the GTP using Opal data to and from the site.
 - Traffic volumes can also be assessed on the road network within the site area, before and after work. These could be monitored to assess whether:
 - Staff and visitors are re-moding private vehicles to public transport.
 - Parking and pedestrian counts

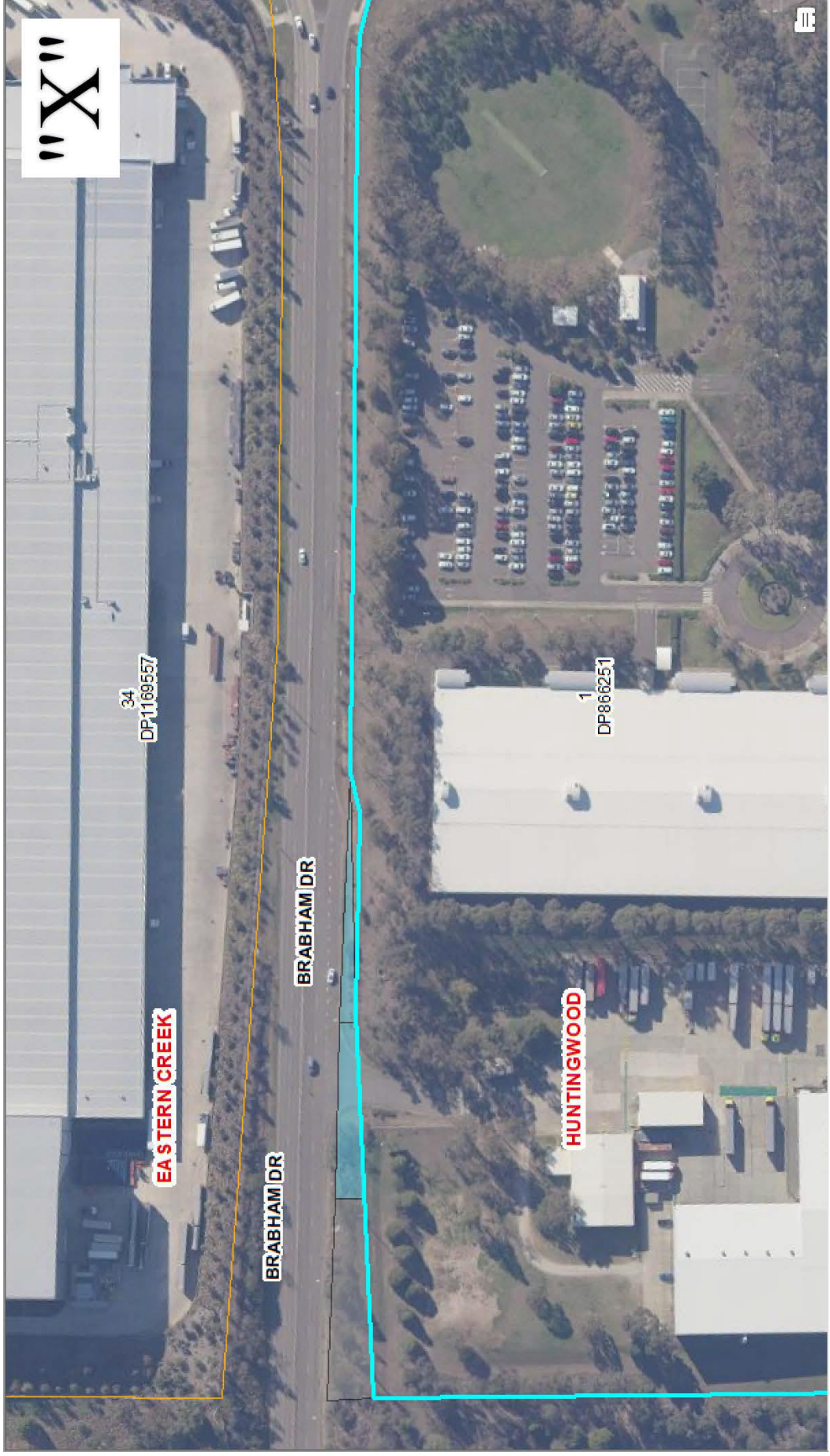
If you have any further questions, Mr. Felix Liu would be pleased to take your call on 8849 2113 or email development.sydney@transport.nsw.gov.au. I hope this has been of assistance.

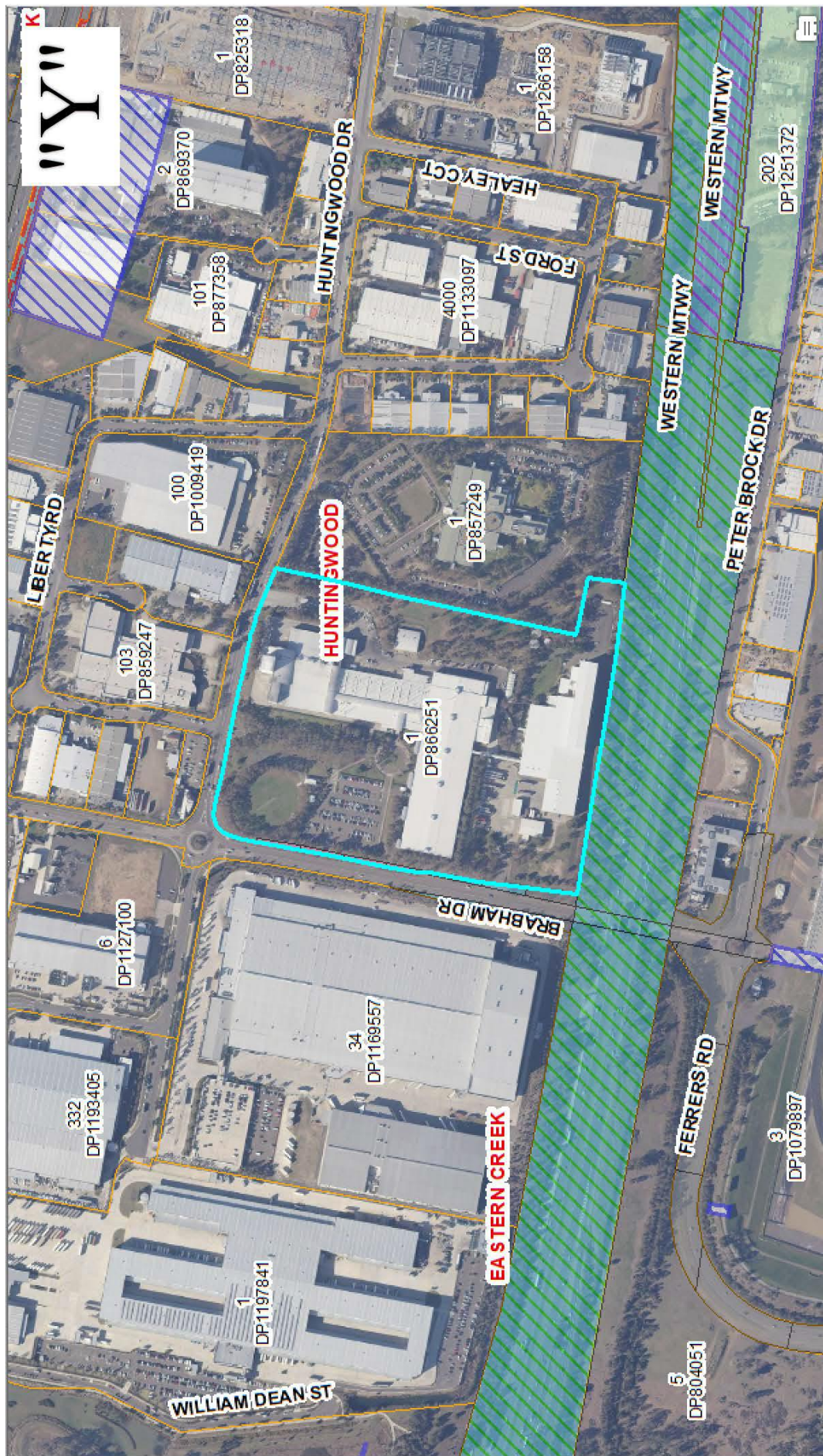
Yours sincerely,

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Malgy Coman

Senior Land Use Planner







OUT21/15908

Mr David Koppers
Department of Planning Industry and Environment
David.koppers@planning.nsw.gov.au

Dear Mr Koppers

SSD-17352813 Huntingwood Processing Expansion

Thank you for your correspondence dated 19 October 2021 providing the opportunity to review the environmental impact statement (EIS) for SSD-17352813 for the Huntingwood Processing Expansion proposal at 65 Huntingwood Drive, Huntingwood in the Blacktown local government area (LGA).

The NSW Department of Primary Industries (DPI) Agriculture is committed to the protection and growth of agricultural industries, and the land and resources upon which these industries depend.

DPI Agriculture has reviewed the EIS and notes the proposed development comprises construction of a new processing facility, new ingredients silos and storage buildings, and associated works.

DPI Agriculture has no concerns with the proposed development.

DPI Biosecurity and Food Safety has advised that the proponent will need to comply with the Australia New Zealand Food Standards Code and all applicable parts of the Food Act 2003. Further information can be obtained at the NSW Food Authority [website](#) and the relevant food safety requirements are available [here](#).

Should you require clarification on any of the information contained in this response, please contact me on 0429 864 501 or by email at landuse.ag@dpi.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'Paul Garnett', with a large loop at the end.

26 October 2021
Paul Garnett
Agricultural Land Use Planning Officer

Mr David Koppers
Senior Environmental Assessment Officer
Energy Resource Assessment
Planning and Assessment Group
Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

Dear Mr Koppers

Subject: Huntingwood Processing expansion – 65 Huntingwood Drive, Huntingwood (SSD-17352813)

Thank you for your email received 19 October 2021 requesting comments on the Environmental Impact Statement (EIS) for the subject proposal. Environment, Energy and Science Group (EES) has undertaken a review of the EIS and related information and provides the following comments.

Biodiversity and Landscaping

EES raises no comments or concerns in relation to the Biodiversity Development Assessment Report prepared by Ecological Australia. Due to the landscaped and planted nature of vegetation on site, no biodiversity offset obligations have resulted from this assessment.

Application of the avoid, minimise and offset hierarchy must still be demonstrated for the proposed development and EES notes that of the 342 trees assessed for the proposed development, 272 are proposed for removal. The proposed landscape plan identifies a total of 256 replacement trees to be planted on site.

To further minimise impacts, the proposed landscape plan should be amended to incorporate additional canopy tree planting. Opportunity for additional planting may exist within the eastern and southern boundary setbacks. An overall increase in the number canopy trees is preferred however at minimum a replacement ratio of 1:1 should be achieved.

EES also notes that the planting schedule included in the landscape plan fails to specify the number of each tree species to be planted. This detail should be provided to demonstrate a suitable level of species diversity in the proposed landscaping.

Further to the above, EES recommends that landscaping of the site uses a diverse mix of local provenance native species from the native vegetation communities that occur, or once occurred on the site (Cumberland Plain Woodland) rather than using exotic species or non-local native species. EES notes that several of the shrubs, grasses and groundcover species in the 'indicative planting schedule' in the Landscape Plans are not consistent with species found within Cumberland Plain Woodland.

Flooding

EES raises no comments or concerns in relation to flooding.

If you have any queries please contact Shaun Hunt, Senior Conservation Planning Officer at shaun.hunt@environment.nsw.gov.au or 02 8275 1617.

Yours sincerely

A handwritten signature in black ink that reads "S. Harrison". The signature is written in a cursive, flowing style.

17/11/21

Susan Harrison

**Senior Team Leader Planning
Greater Sydney Branch
Biodiversity and Conservation**



DOC21/918639-15

Planning and Assessment Division
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Email: planning.apps@planning.nsw.gov.au

10 November 2021

No Comment to Planning Advice Request

To whom it may concern

I refer to your request for advice regarding the proposed concept approval for the proposed expansion of the existing food processing facility (bakery) Huntingwood Processing facility at 65 Huntingwood Drive, Huntingwood (Application: SSD-17352813).

The EPA understand that this is an existing facility occupied by Arnott's Biscuit's.

Based on the information provided, the proposal does not appear to require an environment protection licence under the *Protection of the Environment Operations Act 1997*.

The EPA has no comments to provide on this project and no follow-up consultation is required. Blacktown City Council should be consulted as the appropriate regulatory authority for the *Protection of the Environment Operations Act 1997* in relation to the proposal.

If you have any questions about this request, please contact Environment Line on 131 555 and quote the above reference number.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Steve Beaman'.

STEVE BEAMAN PSM
Executive Director Regulatory Operations
NSW Environment Protection Authority

PAC Response	Engagement Details	Engagement History	Audit
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Response History	
<div><div><div>Public Authority Response</div><div>Classification</div><div>Support</div><div>Notes:</div><div>Heritage NSW has reviewed the Aboriginal Cultural Heritage component of the Environmental Impact Statement (EIS) for the Huntingwood Processing Facility Expansion (SSD-17352813).</div><div>Heritage NSW has no additional comments or recommendations on this proposal.</div><div>If you require any further information please contact:</div><div>Nicole Y Davis</div><div>Archaeologist</div><div>Aboriginal Cultural Heritage Regulation - North</div><div>Heritage NSW</div><div>Community Engagement</div><div>Department of Premier and Cabinet</div><div>nicole.davis@environment.nsw.gov.au</div><div>HERITAGEMailbox@environment.nsw.gov.au</div></div><div>Tuesday, 9 November 2021 9:55:58 AM AEDT</div></div>	