



HUNTINGWOOD PROCESSING EXPANSION

Submissions Report
SSD-17352813

Prepared for
CHARTER HALL HOLDINGS PTY LTD
24 March 2022

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CONTENTS

Executive Summary.....	4
1. Introduction	7
1.1. Exhibited Project	7
1.2. Supporting Documentation	7
2. Analysis of Submissions.....	9
2.1. Breakdown of Submissions	9
2.2. Categorising Key Issues	9
3. Actions Taken Since Exhibition.....	10
3.1. Further Consultation	10
3.2. Additional Impact Assessment.....	10
4. Response to Submissions	12
4.1. EIS Clarifications.....	28
5. Project Justification	31
Disclaimer.....	33

Appendix A	Mitigation Measures
Appendix B	Air Quality and Odour Assessment
Appendix C	Traffic RFI Response
Appendix D	Revised Site Plan
Appendix E	Revised Statutory Compliance Table
Appendix F	Revised Landscape Plans
Appendix G	Stormwater Drainage Response, Revised Integrated Water Cycle Management Plan and Civil Drawings

TABLES

Table 1 Supporting Documentation	7
Table 2 Summary of Further Engagement	10
Table 3 Response to Submissions	13
Table 4 Existing consents that apply to the site	28
Table 5 Overview of proposed development	29

EXECUTIVE SUMMARY

This Submissions Report has been prepared on behalf of Charter Hall Holdings Pty Ltd (**the Applicant**) to address the matters raised by government agencies, local Council, and relevant stakeholders during the public exhibition of the proposed development at 65 Huntingwood Drive, Huntingwood (**the site**).

The State Significant Development Application (**SSDA**) was lodged with the Department of Planning, Industry and Environment (**DPIE**) in accordance with Clause 3 Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* (SEPP SRD).

DPIE issued a letter to the Applicant on 2 December 2021 requesting a response to the issues raised during the public exhibition of the application. Whilst DPIE's Request for Additional Information largely relates to matters of clarification, a quantitative evidence based assessment of air quality was required.

This Submissions Report addresses the clarifications, outlines the additional information requested and responds to all issues raised within submissions.

Overview of Submissions

The SSDA was on public exhibition between 21 October 2021 and 17 November 2021. A total of ten (10) submissions were received from NSW government agencies and local Council including:

- Transport for NSW (**TfNSW**)
- DPIE – Environment, Energy and Science Group (**EES**)
- NSW Environment Protection Authority (**EPA**)
- Blacktown City Council (**Council**)
- Essential Energy
- Heritage NSW
- Department of Primary Industries (**DPI**)
- Sydney Water
- NSW Fire & Rescue
- SafeWork NSW

The submission from Council objected to the SSDA on the basis that stormwater drainage matters had not been adequately addressed. The submissions from Heritage NSW, DPI, Sydney Water, NSW Fire & Rescue and SafeWork NSW stated that they had no further comments on the Project.

One submission was received from Goodman, the owner of a neighbouring property.

The key issues raised in the submissions can be broadly grouped into the following categories:

- Air Quality
- Drainage – Stormwater and water quality
- Landscaping
- Clarification matters

Since only a small number of submissions were received, this Submissions Report provides a response to each individual submission within **Section 4**.

Actions Taken Since Exhibition

Since the SSDA was publicly exhibited, the Applicant has undertaken further consultation with DPIE, Council and TfNSW to discuss the issues raised within their submissions. Additional assessments have been undertaken to respond to the issues raised in the submissions and include:

- Revised Integrated Water Management Plan and Civil Drawings

- Revised Air Quality Assessment based on a quantitative analysis

Response to Submissions

In response to the submissions received, minor refinements have been made to the landscape and stormwater drainage design (civil works) across the site. No design changes have been made to the proposed processing facility, associated built form or car parking.

Justification and Evaluation

Given the limited issues raised in the submissions and additional assessments undertaken, we reiterate the justification for the Project as previously outlined in the Environmental Impact Statement (EIS). The proposal represents a positive development outcome for the site and surrounding area for the following reasons:

The proposal is consistent with state and local strategic planning policies:

The proposal is consistent with the relevant goals and strategies contained in:

- *Greater Sydney Region Plan: A Metropolis of Three Cities*
- *Our Greater Sydney 2056: Central City District Plan*
- *Future Transport Strategy 2056*
- *Better Placed*
- *Blacktown Local Environmental Plan 2015 (BLEP 2015)*

The proposal satisfies the applicable local and state development controls:

The proposal is permissible with consent and meets the relevant statutory requirements of the relevant environmental planning instruments, including *State Environmental Planning Policy (State and Regional Development) 2011*, *State Environmental Planning Policy No. 55 – Remediation of Land*, *State Environmental Planning Policy No.33 – Hazardous and Offensive Development* and *BLEP 2015*.

The design responds appropriately to the opportunities and constraints presented by the site:

- The proposed development will expand and leverage the capabilities of one of the most advanced food manufacturing facilities in Australia and provide for the successful integration within existing operations. The proposed development has been located on residual land within the site and ensures the more efficient and effective integration with existing operations with minimal disruption during the construction phase.
- The design and layout utilise the existing vehicle access to the site for both light and heavy vehicles and minimises additional traffic generation through the consolidation of manufacturing operations, storage and distribution within one site.
- Whilst the built form and bulk of the proposed development is largely dictated by the engineering and logistical requirements of the intended purpose, it is entirely consistent with the character of the surrounding Huntingwood Industrial Precinct and will incorporate high-quality materials and finishes.
- The proposal involves significant replacement tree planting of 272 trees to mitigate the loss of planted native vegetation and filter views to and reduce the visibility of the proposed development from the public domain.

The proposal is highly suitable for the site:

The proposal will allow the expansion of the existing food processing facility within the site, which is permissible with consent and consistent with the IN2 Light Industrial Zone objectives outlined in the BLP 2015. Further, there are no significant environmental constraints that would limit the proposal from being developed at the site.

The proposal is in the public's best interest:

- The proposed development will accommodate up to 229 Full-Time Equivalent (**FTE**) jobs during the construction phase, and 273 direct FTE jobs once complete and fully operational. The proposal will stimulate local investment and contribute significant economic output and value add to the economy each year.

- The proposal will have no adverse environmental impacts upon residential properties as the site is well separated from residential land. Subject to the various mitigation measures recommended by the specialist consultants, the proposal will not have any unreasonable impacts on neighbouring properties or the public domain in terms of traffic, noise and vibration, air quality and odour or views during construction and ongoing operation of the facility.
- Engagement with relevant community, government and agency stakeholders has been undertaken with respect to the proposed development, with no major issues having been raised through the consultation processes.
- It can be concluded that on balance, the benefits of the development outweigh any adverse impacts and as such, the development is in the public interest.

In view of the above, it is considered that this SSDA has significant merit and should be approved subject to the implementation of the mitigation measures described in this report and supporting documents.

1. INTRODUCTION

This Submissions Report relates to the proposed expansion of the existing food processing operations at 65 Huntingwood Drive, Huntingwood (**the site**). On behalf of Charter Hall Holdings Pty Ltd (**the Applicant**), this Submissions Report has been prepared to address the matters raised by public agencies, local Council, and relevant stakeholders throughout the public exhibition period.

The State Significant Development Application (**SSDA**) was lodged with the Department of Planning, Industry and Environment (**DPIE**) in October 2021 (SSD-17352813). The SSDA was placed on public exhibition for 28 days between 21 October 2021 and 17 November 2021.

This Submissions Report has been prepared in accordance with the *DPIE State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) July 2021*.

1.1. EXHIBITED PROJECT

The SSDA seeks consent for:

- Site preparatory works, including:
 - Demolition and clearing of at-grade car park (260 spaces), driveway, ancillary structures and vegetation;
 - Bulk earth works for the basement car park and to establish a flat development platform, and site stabilisation works; and
 - Drainage connections and land stabilisation.
- Construction of a new processing facility (24,775sqm) to the west of the existing processing building. The northern end of the building incorporates a first floor for staff amenities and meeting rooms, and second floor to accommodate plant areas.
- Construction of new ingredient silo building (1,000sqm) along the Huntingwood Drive frontage.
- Construction of a storage building (270sqm) to the east of the existing processing building.
- Construction of a new processing building (1,200sqm) to the south of the existing facility and ingredient silo building (120sqm) to the south of the main facility.
- New loading area above two levels of car parking (468 spaces) at the north-west corner of Huntingwood Drive and Brabham Drive.
- The existing on-site detention (**OSD**) basin will be replaced with an OSD tank below the basement car park.
- Landscaping works throughout the site including 265 replacement trees and partial green wall to the car park structure.

1.2. SUPPORTING DOCUMENTATION

This Submissions Report is supported by the following technical reports and documentation.

Table 1 Supporting Documentation

Appendix	Report	Prepared By
Appendix A	Mitigation Measures	Urbis
Appendix B	Revised Air Quality Assessment	SLR
Appendix C	Traffic RFI Response	Urbis
Appendix D	Revised Site Plan	HLA

Appendix	Report	Prepared By
Appendix E	Revised Statutory Compliance Table	Urbis
Appendix F	Revised Landscape Plans	Site Image
Appendix G	Stormwater Drainage Response, Revised Integrated Water Cycle Management (IWCM) Report and Revised Civil Drawings	Sparks & Partners

2. ANALYSIS OF SUBMISSIONS

This section provides a summary of the submissions received including a breakdown of respondent type, nature and number of submissions received.

2.1. BREAKDOWN OF SUBMISSIONS

There were ten submissions received from public agencies and the local Council, and one submission received from a neighbouring property.

The submission received from Blacktown City Council was in the form of an objection to the proposal. The submissions from Heritage NSW, DPI, Sydney Water, NSW Fire & Rescue and SafeWork NSW stated that they had no further comments on the Project.

All submissions were managed by DPIE, which included registering and uploading the submissions onto the 'Major Projects website' (SSD-17352813).

2.2. CATEGORISING KEY ISSUES

Since only a small number of submissions were made, a response to each individual submission is included within the Response to Submissions at **Section 4**.

The key issues raised in the submissions are summarised below

- Absence of a quantitative evidence-based assessment of air quality
- Drainage issues, particularly related to stormwater management and water quality
- Proposed replacement tree planting
- Intersection performance of Brabham Drive and Great Western Highway
- Management of fill and findings of the Preliminary Site Investigation
- Minor clarification matters associated with the Environmental Impact Statement (**EIS**) and technical reports.

3. ACTIONS TAKEN SINCE EXHIBITION

In response to the key issues raised within the submissions, minor refinements have been made to the landscape and drainage design (civil works) across the site. No design changes have been made to the proposed processing facility, associated built form or car parking.

This section also outlines the further consultation and additional assessment undertaken to respond to the concerns raised with the submissions outlined in **Section 2**.

3.1. FURTHER CONSULTATION

Since the public exhibition of the SSDA between 21 October 2021 and 17 November 2021, the Applicant has undertaken further consultation as outlined in **Table 2**.

Table 2 Summary of Further Engagement

Stakeholder	Date	Outcome
Department of Planning, Industry & Environment	Virtual Meeting on 17 November 2021 and 16 March 2022. Attended by: DPIE SLR Consulting Urbis FDC Construction	Discussed the Air Quality and Odour Assessment and the reliance on an operational risk assessment methodology. Following further consultation with DPIE, it was agreed by the Applicant that a quantitative evidence-based assessment with appropriate dispersion modelling would be prepared.
Blacktown City Council	Virtual Meeting on 30 November 2021. Attended by: Blacktown City Council Sparks & Partners Urbis FDC Construction	Applicant agreed to address all drainage issues raised in Council's submission. Revised documentation provided to Council on 17 December 2021 requesting preliminary review. Council provided 'in-principle' support for amended documentation on 17 January 2021, noting that formal assessment would be required. It is requested that Council withdraw its objection to the SSDA on the basis of the revised documentation.
Transport for NSW	Phone call on 13 December between TfNSW and Urbis	Discussed the requirement to assess the intersection performance of Brabham Drive and Great Western Highway. It was agreed that if sufficient justification could be provided then modelling of the intersection performance would not be necessary.

3.2. ADDITIONAL IMPACT ASSESSMENT

Additional assessments have been undertaken to respond to the issues raised within the submissions. These include:

- Revised Integrated Water Management Plan and Civil Drawings

- Revised Air Quality Assessment based on a quantitative analysis

The findings and recommendation of the additional assessments are discussed in **Section 4** of this report.

4. RESPONSE TO SUBMISSIONS

Since only a small number of submissions were received during the public exhibition process, a response to each individual submission is included in **Table 3**.

Table 3 Response to Submissions

Summary of Issue Raised	Response	Supporting Document
Department of Planning, Industry and Environment		
<p>Air Quality:</p> <p>1. The operational risk assessment methodology used is not supported and a quantitative evidence based assessment with appropriate dispersion modelling must be used to demonstrate that the development can comply with the relevant air quality criteria and must consider cumulative impacts generated from the sites existing operations. The quantitative assessment must include an assessment of ammonia emissions. This requirement does not apply to the odour impact assessment.</p>	<p>A revised Air Quality Assessment has been prepared by SLR and is based on a quantitative assessment with appropriate dispersion modelling.</p> <p>The assessment concludes that there are no exceedances of any of relevant criteria for air emissions at any sensitive receptors. The cumulative assessment has predicted a single additional exceedance of the 24-hour average PM2.5 criterion for an industrial/commercial receptor (located 30 m to the south of the site). This exceedance is not deemed to be an issue given the nature of the receptor, conservatism in the modelling and high background concentrations on the day of the exceedance.</p>	Appendix B
<p>Traffic:</p> <p>2. Confirm the unloading locations for the existing and proposed silo buildings and the new smaller processing building. If the unloading locations are located in areas utilised for through traffic movements, it will need to be explained how the interaction between parked and transiting heavy vehicles will operate in practice.</p>	<p>The unloading locations associated with the existing and proposed silo buildings and new smaller processing building are shown in the figure that accompanies the Traffic RFI Response.</p> <p>The loading area for Proposed Silo 2 is the only location also utilised for through traffic movements. Loading of this silo will be managed to ensure no heavy vehicles are using this road at the time of loading. This is possible as a maximum of one heavy vehicle per hour will be accessing the proposed loading dock and the vehicle access around the new processing facility will be one-way.</p>	Appendix C
<p>3. Table 11 (TIA) – Total vehicle entries and exits for Huntingwood 1 are not equal. Huntingwood 2 is movements are equal.</p>	<p>Refer revised Table 11 in Traffic RFI Response.</p>	Appendix C

Summary of Issue Raised	Response	Supporting Document
<p>4. In accordance with the submission made by Transport for NSW, the intersection performance of Brabham Drive and Great Western Highway shall be assessed.</p>	<p>The requirement to undertake to assess the intersection performance of Brabham Drive and Great Western Highway was discussed with TfNSW. It was agreed that if sufficient justification could be provided then modelling of the intersection performance would not be necessary. As outlined in the Traffic RFI Response at Appendix C, the only staff members that will be accessing / egressing the site during the network peak period will be the 16 additional office staff who work a typical 9 AM to 5 PM day and two additional heavy vehicles. Shift times for the new processing facility have been established to avoid peak hour times, noting the day shift commences at 6 AM.</p> <p>Assuming that new vehicles were distributed 50 / 50 eastbound and westbound along the Great Western Highway and all office staff drove, traffic generated by the site accounts for:</p> <ul style="list-style-type: none"> ▪ 0.5 per cent of eastbound traffic in the AM peak. ▪ 1.4 per cent of westbound traffic in the AM peak. ▪ 0.8 per cent eastbound traffic in the PM peak. ▪ 0.43 per cent of westbound traffic in the PM peak. <p>This amount of additional generated traffic will have a negligible impact on the intersections concerned and should not need to be modelled.</p>	Appendix C
<p>Preliminary Site Investigation (PSI)</p> <p>5. Confirm that the PSI incorporates a limited Detailed Site Investigation (DSI) and clarify the extent of works undertaken by the DSI.</p>	<p>We confirm that the PSI incorporates a limited DSI as it involved sampling from six boreholes within the north-western corner of the site concurrently with the Geotechnical Investigation. In the report prepared by JK Environmental, the DSI component was limited as it has not included a systematic sampling plan to meet the EPA sampling density.</p> <p>Soil samples analysed during the investigation did not identify contaminant concentrations above the established Site Assessment Criteria for the project. However, the potential contamination sources trigger a need for a DSI based on the</p>	N/A

Summary of Issue Raised	Response	Supporting Document
	<p>State Environmental Planning Policy (SEPP) 55 Guidelines.</p> <p>As outlined in the PSI, JKE is of the opinion that the site can be made suitable for the proposed development. Nonetheless, we acknowledge that a DSI is required prior to the commencement of construction to confirm if the site is suitable in its current state or if remediation is required. We would expect a condition of consent requiring the preparation of a DSI and Remedial Action Plan (if required) prior to the issue of a construction certificate.</p>	
<p>6. The PSI has categorised the existing fill on the site to be General Solid Waste and suggests offsite disposal will be needed. Confirm what is the plan with the management of the fill and the total amount of existing onsite fill.</p>	<p>FDC Constructions have confirmed that the intent is for all material to remain on site where possible. Where required to excavate material to reduce levels on site (i.e. the car park), this material will be used elsewhere and compacted in accordance with the geotechnical recommendations. The shortfall in material is 23,523m³ which will be imported from off-site.</p> <p>In summary, the aim of the project is that no material will need to go to landfill or any other recycling facility.</p>	N/A
<p>Geotechnical</p> <p>7. The Geotechnical report states that much of the development area is classified as uncontrolled fill which is not suitable to support footings or floor slabs. How it this going to be addressed? Consideration must also be given to the findings of the PSI.</p>	<p>JK Geotechnics have advised that if the slab is designed as a suspended slab with piers as foundations, the additional fill does not need to be engineered fill with full inspection and testing. It could be placed as 'form fill' with nominal compaction and limited, if any, testing.</p>	N/A
<p>Clarifications:</p> <p>8. Confirm the estimated production capacity of the development (tonnes per annum).</p>	<p>The facility currently produces approximately 55,000 tonnes of products per year, and the proposed expanded facility is estimated to add a further 13,000 tonnes per year (an increase of approximately 25%)</p>	N/A

Summary of Issue Raised	Response	Supporting Document
9. Table 3 (EIS) – Confirm the Development Application and Modification reference numbers, as there are inconsistencies with the numbering format.	Refer revised information in Table 4 below.	N/A
10. The information presented in Table 5 (EIS) and Drawing No. 200810-DA-003-S and 200810-DA-100-C appears to be inconsistent. 'Building Area' figures in Table 5 do not add up.	Review revised information in Table 5 below.	N/A
11. Table 9 (EIS) – Vehicle entries and exits for Huntingwood 1 is not consistent. Huntingwood 2 is consistent.	Refer revised information in Table 6 below.	N/A
12. Table 17 (EIS) – confirm the total amount of material that is required to be excavated onsite and the total amount of additional fill that is required to be imported.	The proposal will involve a bulk cut to fill exercise that requires the excavation of 22,551m ³ and filling that elsewhere on site. Once this is completed, 23,523m ³ of additional fill will be imported from off-site to reach the design levels.	N/A
Section 3.2.3 (EIS) and Figure 16 (EIS) – provides a brief overview of the manufacturing process. A more detailed explanation would be beneficial and should include an explanation of how the proposed expansion operations integrate with the existing packaging hall, packing warehouse and high-bay warehouse.	<p>The new processing facility largely operates independently from the existing facility with the exception of the following:</p> <ul style="list-style-type: none"> <li data-bbox="781 1033 1803 1105">▪ bulk ingredients delivery which are pumped from the silos along the Huntingwood Drive frontage; and <li data-bbox="781 1129 1724 1200">▪ conveyors running through the existing facility and then shared airbridge to transport the finished and cartonised products to the high bay warehouses. <p>In simple terms, the manufacturing process within the new facility is summarised as follows:</p> <ul style="list-style-type: none"> <li data-bbox="781 1327 1803 1383">▪ Delivery of bulk ingredients to silos at northern end of the site using heavy vehicle access from Huntingwood Drive. The silos will serve both the existing and proposed 	N/A

Summary of Issue Raised	Response	Supporting Document
	<p>processing buildings.</p> <ul style="list-style-type: none"> ▪ Delivery of other smaller ingredients and packaging also using the heavy vehicle access from Huntingwood Drive, directly to the new facility. ▪ Biscuit production lines through proposed processing building to finished product. ▪ Packaging and boxing of finished products into cartons. The proposed facility has its own packaging and packing sections, completely separate to the existing facility. ▪ Transfer of finished cartonized products to high-bay warehouses at southern end of the site via conveyors running through existing facility, and then by airbridge to palletisers. ▪ Storage and Dispatch of the finished product in the fully automated high-bay warehouses. 	
<p>The ESD Report (Appendix T) makes reference to a large solar array. This does not appear to be illustrated on the submitted plans or referenced in the EIS. Details on the solar system and its location are to be provided.</p>	<p>The proposed solar system will have a 1 megawatt capacity and involve approximately 2,700 solar panels.</p> <p>The revised site plan at Appendix C shows the proposed locations for the solar panels on the roof of the new facility.</p>	Appendix D
<p>The Statutory Compliance Table (Appendix C) does not consider all of section 1.3 of the Environmental Planning and Assessment Act 1979 (stops at 1.3(e)). All of section 1.3 should be addressed.</p>	<p>A Revised Statutory Compliance Table has been prepared (dated 15 Nov 202) and is provided at Appendix E.</p>	Appendix E
Environment, Energy and Science Group (EES)		
<p>To further minimise impacts, the proposed landscape plan should be amended to</p>	<p>Site Image has reviewed the landscape plans, however there is no further opportunity for additional tree planting within the site. The proposal achieves a minimum</p>	N/A

Summary of Issue Raised	Response	Supporting Document
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.	replacement tree ratio of 1:1.	
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.	The planting schedule has been updated to specify the number of each tree species to be planted. As shown in the schedule, the number of trees has been evenly spread across each species to achieve adequate diversity.	Appendix F
EES recommends that landscaping of the site uses adverse 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.	The landscape plans have been amended to ensure that species of shrubs, grasses and groundcovers are consistent with the Cumberland Plain Woodland.	Appendix F
EES raises no comments or concerns in relation to flooding.	Noted	N/A

Summary of Issue Raised	Response	Supporting Document
<p>Transport for NSW</p> <p>TfNSW (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”.</p> <p>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.</p> <p>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.</p>	<p>The proposal does not involve any changes to the existing vehicle access point along Brabham Drive. In addition, no new access points are proposed along this frontage.</p> <p>No access is proposed from the M4 Western Motorway and all buildings and structures will be contained within the property boundary.</p>	N/A
<p>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.</p>	<p>This can be addressed by way of a condition of consent.</p>	N/A

Summary of Issue Raised	Response	Supporting Document
<p>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.</p>	<p>This can be addressed by way of a condition of consent.</p>	<p>Appendix C</p>
<p>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.</p>	<p>Noted. The requirements set out in the Transport Delineation Guidelines are not mandatory and are to be used as a guide. All proposed markings are subject to Council approval.</p>	<p>Appendix C</p>
<p>To encourage the use of active transport and public transport, the following mitigation measures could be considered:</p> <p>Improvement of bus stop amenities by proving shelter and seating at the bus stops in close vicinity to the subject along Huntingwood Drive.</p> <p>Provision of share path infrastructure along Brabham Drive.</p> <p>Provision of pedestrian refuge and pram ramp for the north and east legs of the Brabham Drive and Huntingwood Drive intersection.</p>	<p>Whilst the Applicant supports the preparation of a GTP before the issue of an occupancy certificate, the submission from TfNSW recommends that the GTP adopt mode share targets for sustainable transport active and public transport that are unrealistic given:</p> <ul style="list-style-type: none"> ▪ The time of shift changeovers (particularly 6 AM and 10 PM). ▪ The nature of work being undertaken at the site. ▪ The location from local residential areas. <p>On the basis that active transport and public transport will not have a high mode share at any point, it is not considered reasonable to require the Applicant to make a contribution towards this infrastructure.</p>	<p>N/A</p>

Summary of Issue Raised	Response	Supporting Document
<p>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.</p>	<p>Temporary car parking arrangements during construction is detailed in Section 3.3 and 3.4 of the TIA prepared by Urbis.</p> <p>Peak car parking demand for the site for staff during construction will be:</p> <ul style="list-style-type: none"> ▪ 323 if all staff drove. ▪ 290 if the current mode share (90 per cent) found in Section 2.4 of the TIA is applied. <p>Details as to whether the temporary parking arrangements can support the peak parking demand are outlined below:</p> <ul style="list-style-type: none"> ▪ During the site remediation phase and Construction Stage 2, there will be sufficient car parking to support the maximum car parking demand in both peak scenarios listed above. ▪ During Construction Stage 1, there will be 281 car parking spaces available for staff to use (refer temporary parking layout provided at Appendix C) if car usage is assumed to be in line with the current mode share. ▪ Additional demand for spaces can be managed through the use of staggered arrival times during Construction Stage 1. ▪ The peak demand of 290 car parking spaces will not be for a long period of time, once staff members depart after the completion of a shift, demand is significantly reduced. 	<p>Appendix C</p>
<p>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</p>	<p>Refer to earlier response under DPIE submission.</p>	<p>Appendix C</p>

Summary of Issue Raised	Response	Supporting Document
intersections along Great Western Highway intersections and the impact of the proposed development on the classified road network.		
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.	A revised Figure 14 has been prepared.	Appendix C
The GTP should be updated to include the additional improvements recommended by TfNSW made to increase the efficiency of the GTP to promote sustainable transport options for staff and visitors to and from the proposed development.	<p>The GTP can be amended by way of a condition of consent prior to the issue of an occupancy certificate.</p> <p>Notwithstanding this, TfNSW has recommended that the GTP adopt mode share targets for sustainable transport active and public transport that are unrealistic given the nature of the development.</p> <p>Introducing a shuttle bus to provide connection between the site and local train stations will be an impractical solution due to:</p> <ul style="list-style-type: none"> ▪ The time of shift changeovers (particularly 6 AM and 10 PM). ▪ The nature of work being undertaken at the site. <p>Few workers would be incentivised by the shuttle bus to take them to train stations, particularly late at night when services are reduced, and natural lighting is minimal. The following mode share is therefore proposed:</p> <ul style="list-style-type: none"> ▪ 75 per cent private vehicle as driver. ▪ 15 per cent private vehicle as passenger. 	Appendix C

Summary of Issue Raised	Response	Supporting Document
	<ul style="list-style-type: none"> ▪ 10 per cent bus plus train. <p>Increasing carpooling to 15 per cent is a much more practical solution for reducing the dependence on staff driving alone to and from the site. Increasing public transport mode share by more than 10 per cent is also not a practical solution to offset the reduction of the shuttle bus as the existing public transport services are infrequent and indirect and unlikely to attract more than 10 per cent of workers to use the service.</p>	
Blacktown City Council		
On-site Stormwater Drainage and Water Quality Amended civil drawings, Model for Urban Stormwater Improvement Conceptualisation (standard) model and updated Integrated water management report to be provided to address all issues outlined in Council's Submission.	<p>The amended documentation was provided to Council on 17 December 2021 for preliminary review and has received 'in-principle' support from Council. We acknowledge that the revised documentation at Appendix G and MUSIC Model will be provided to Council for formal assessment.</p> <p>The Stormwater Drainage Response prepared by Sparks and Partners at Appendix G outlines how the technical matters in Council's submission have been addressed.</p>	Appendix G
Department of Primary Industries		
DPI Agriculture has no concerns with the proposed development.	Noted – no action required.	N/A
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.	This can be addressed by way of a condition of consent.	N/A

Summary of Issue Raised	Response	Supporting Document
NSW Environment Protection Authority (EPA)		
<p>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.</p> <p>The EPA has no comments to provide on this project and no-follow up consultation is required.</p>	<p>Noted – no action required.</p>	<p>N/A</p>
Heritage NSW		
<p>Heritage NSW has reviewed the Aboriginal Cultural Heritage component of the EIS and has no additional comments or recommendations on this proposal.</p>	<p>Noted – no action required.</p>	<p>N/A</p>
<p>Essential Energy</p> <p>The submission made by Essential Energy relies on the issues raised in their submission to Blacktown Council dated 14 September 2018 for an earlier development application (DA-18-00883) for the site.</p>	<p>The following matters from the 2018 submission are of limited relevance to the current SSDA:</p> <ul style="list-style-type: none"> ▪ Proximity to Essential Energy's telecommunications tower given the current proposal is significantly lower than the 50m highbay warehouse approved under DA-18-00883. ▪ Truck movements as the concerns related to a different development and vehicle access from Braham Drive. ▪ The comments on the DCP response and visual analysis relate to a vastly different development and are not relevant to the current proposal. <p>The issues of relevance to the current proposal are addressed below.</p>	<p>N/A</p>

Summary of Issue Raised	Response	Supporting Document
Adequacy of network capacity and proposed connection.	Network capacity and detailed connection requirements will be determined as the project transitions through detailed design development. Consultation with Essential Energy will be ongoing throughout the designed design process.	N/A
Earthing – The construction of any building or structure (including fencing, signage, flag poles etc) whether temporary or permanent that is connected to or in close proximity to Endeavour Energy's electrical network is required to comply with Australian/New Zealand Standard AS/NZS 3000:2007 'Electrical installations' to ensure that there is adequate connection to the earth.	Earthing design will be in accordance with Australian Standards requirements.	N/A
Safety clearances – Any buildings, structures (including fencing, signage, flag poles etc) whether temporary or permanent must comply with the minimum safe distances for voltages up to and including 132,000 volts (132kV).	Safety clearances will be documented during detailed design development.	N/A
<p>Easement Management/Network Access – The following is a summary of the usual/main terms of Endeavour Energy's electrical easements requiring that the land owner:</p> <p>Not install or permit to be installed any services or structures within the easement site.</p> <p>Not alter the surface level of the easement site.</p> <p>Not do or permit to be done anything that restricts access to the easement site without the prior written permission of Endeavour Energy and in</p>	Any new or existing easements within the scope of the project will adhere to relevant authority requirements.	N/A

Summary of Issue Raised	Response	Supporting Document
accordance with such conditions as Endeavour Energy may reasonably impose.		
Vegetation management – Suitable planting needs to be undertaken in proximity to electricity infrastructure. Only low growing shrubs not exceeding 3.0 metres in height, ground covers and smaller shrubs, with non-invasive root systems are the best plants to use. Larger trees should be planted well away from electricity infrastructure (at least the same distance as from overhead power lines as their potential full grown height) and even with underground cables, be installed with a root barrier around the root ball of the plant.	The Revised Landscape Plans include appropriate tree species in proximity to electricity infrastructure that will not exceed 3m in height.	Appendix F
Demolition – Demolition work is to be carried out in accordance with Australian Standard AS 2601:2001 ' Demolition of Structures'	This can be addressed by way of a condition of consent.	N/A
OTHER STAKEHOLDERS		
Goodman The Air Quality Assessment should be updated to include assessment of impacts at all sensitive receptor locations defined in the NSW Approved Methods for the Modelling and Assessment of Air Pollutants in NSW. These include any location 'where people are likely to work', including the Estate.	A quantitative assessment of air quality with dispersion modelling has been prepared by SLR. Refer to the summary of key findings under the response to DPIE's submission.	Appendix B

Summary of Issue Raised	Response	Supporting Document
<p>The Air Quality Assessment should be updated to include quantitative assessment tasks, including a Level 1 or Level 2 dispersion modelling assessment in accordance with Approved Methods. At a minimum, this assessment should be carried out for the existing facility, and be based upon emission estimates as reported to the NPI, existing stack sampling data and/or supplementary stack sampling data as required. If ventilation design information is available, then emission values for the existing facility should be used as estimates for emissions from the proposed facility.</p>		

4.1. EIS CLARIFICATIONS

4.1.1. Planning History

We confirm there were inconsistencies in the DA and MOD references in Table 4 of the EIS. Please refer to the updated table below.

Table 4 Existing consents that apply to the site

Application	Description	Approval Date
DA 50/94	This consent is the earliest record of development on the site and allowed the construction of a new biscuit factory and associated offices, extension to warehouse docks and a wastewater treatment plant.	27 February 1995 – Department of Planning
DA-88-0839	Approval for the construction of a warehouse and distribution centre.	9 March 1989 – Blacktown City Council
DA-96-0120	Minor workshop building addition associated with the Arnott's Biscuits manufacturing and warehouse distribution facility.	22 April 1996 – Blacktown City Council
DA-18-00883 MOD-19-00039 MOD-19-00072	<p>The partial demolition and extension of the existing warehouse along the southern boundary, construction of a high bay warehouse to be used for storage with a height of approximately 50m, construction of a new perimeter access road to allow for access to the existing car park facilities, upgrade of loading docks, construction of a small shed to accommodate two heritage Arnott's trucks and site landscaping and associated works.</p> <p>A modification was approved on 14 March 2019 to correct minor errors in the conditions of consent.</p> <p>A major modification was approved on 28 March 2019 to allow a reduction to the building height of the high-bay warehouse, installation of rooftop mechanical ventilation, increased accessibility measures, amended stormwater and civil works.</p> <p>Copies of the development consent and approved modifications are provided at Appendix H. The development consent does not include any restrictions on production quantities and number of heavy vehicle movements.</p> <p>This development was completed and became operational at the end of 2020.</p>	24 December 2018 – Blacktown City Council Modified 14 March 2019 and 28 March 2019 – Blacktown City Council

4.1.2. Development Summary

We confirm there was an error in the building area figures in Table 5 of the EIS (as well as references at Section 2.1.1 and Section 7) when compared to Drawing No. 200810-DA-003-S. Please refer to updated **Table 5** below.

Drawing No. 00810-DA-100-C includes a summary of the car parking numbers and includes the six motorcycle spaces in the total which is causing the inconsistency. We note there are 468 proposed parking spaces plus 6 motorcycle spaces as outlined in the table below.

Table 5 Overview of proposed development

Element	Project Details
Project site area	Development footprint: 1.34ha Extent of basement excavation: 7,217sqm
Site description	Lot 1 in DP 866251
Land use	General industrial comprising food processing (bakery)
Building area	Existing: 59,032sqm Proposed: 45,310sqm Total: 104,342sqm
Building height	Processing building: 14.6m above loading dock Ingredient silo: 29.32m (approx.) Loading dock and car park structure: 9.07m
Access	No changes are proposed to the existing vehicle access points to the site. Light vehicles – existing westernmost access from Huntingwood Drive which will connect to the basement access ramp to the new car park. Heavy vehicles – existing easternmost access from Huntingwood Drive.
Car parking	Proposed 468 car parking spaces accessed from Huntingwood Drive. Existing 95 car spaces access from Brabham Drive to be retained. Proposed 6 motorcycle parking spaces.
Bicycle parking	Proposed 10 bicycle spaces
Timing	Construction estimated to commence early 2022 for approximately 18-20 months.
Jobs	Construction: 91 direct and 138 indirect construction jobs Operation: 273 new direct jobs (Total including existing: 633 jobs) and a further 431 indirect jobs from flow-on effects
Construction hours	Standard hours of construction: <ul style="list-style-type: none">▪ 7.00am to 5.00pm on Monday to Friday; and

Element	Project Details
	<ul style="list-style-type: none"> ▪ 8.00am to 1.00pm on Saturday. ▪ No work on Sundays and Public Holidays
Hours of Operation	24 hours per day, seven days per week
Capital Investment Value	\$115,930,775

4.1.3. Estimated Traffic Generation

We confirm there was an error in Table 9 of the EIS (and Table 11 of the Transport Impact Assessment). An updated table is provided below.

Table 11 Estimated traffic generation by staff

Facility	Shift	Time	Vehicle Entries	Vehicle Exits
Huntingwood 1 (existing)	Day shift changeover	6:30-7:00 AM	174	0
		7:00-7:30 AM	0	109
	Afternoon shift changeover	2:30-3:00 PM	77	0
		3:00-3:30 PM	0	174
	Night shift changeover	10:30-11:00 PM	109	0
		11:00-11:30 PM	0	77
Huntingwood 2 (proposed)	Day shift changeover	5:30-6:00 AM	110	0
		6:00-6:30 AM	0	69
	Afternoon shift changeover	1:30-2:00 PM	94	0
		2:00-3:00 PM	0	110
	Night shift changeover	9:30-10:00 PM	69	0
		10:00-10:30 PM	0	94

Source: Arnott's

5. PROJECT JUSTIFICATION

No additional mitigations measures are proposed beyond those submitted with the original SSDA. The mitigation measures for the Project are provided at **Appendix A**.

Given the limited issues raised in the submissions and additional assessments undertaken, we reiterate the justification for the Project as previously outlined in the EIS. The proposed development has been assessed with regard to the matters for consideration under section 4.15 of the EP&A Act and the SEARs issued by the Secretary of DPIE. We conclude that the proposed development can be supported for the following reasons:

The proposal is consistent with state and local strategic planning policies:

The proposal aligns with the strategic direction and objectives of the Region Plan and accompanying District Plan. The proposal will deliver an additional 45,310sqm of industrial floor space, which will support the retention and management of industrial land within Greater Sydney. The generation of additional employment for the Central City Region will also contribute to the 30-minute city vision set in the Region Plan.

The proposal satisfies the applicable local and state development controls:

The relevant State and local environmental planning instruments are listed in **Section 4** and assessed in **Appendix E**. The assessment concludes that the proposal complies with the relevant provisions within the relevant instruments as summarised below:

- The proposed development has been assessed and designed in respect to the relevant objects of the EP&A Act as defined in Section 1.3 the Act and addressed in the Revised Statutory Compliance Table at **Appendix E**.
- This EIS has been prepared in accordance with the SEARs as required by Schedule 2 of the EP&A Regulations.
- Consideration is given to the relevant matters for consideration as required under the Biodiversity Conservation Act 2016 and the SSDA is supported by a Biodiversity Development Assessment Report accordingly.
- This SSDA pathway has been undertaken in accordance with the SRD SEPP as the proposed development is classified as SSD.
- Concurrence from TfNSW will be required as per the ISEPP for 'traffic generating development'.
- The proposal complies with all of the relevant provisions under the BLEP 2015 as detailed in **Appendix E**. The proposed development is consistent with the objectives of the IN2 Light Industrial Zone.
- The proposed development has been assessed in accordance with SEPP 33 and SEPP 55. The proposed development complies with the relevant clauses of these SEPPs.
- The proposal generally accords with the relevant provisions of the Blacktown Development Control Plan 2015 as outlined in **Appendix E**.

The design responds appropriately to the opportunities and constraints presented by the site:

- The proposed development will expand and leverage the capabilities of one of the most advanced food manufacturing facilities in Australia and provide for the successful integration within existing operations. The proposed development has been located on residual land within the site and ensures the more efficient and effective integration with existing operations with minimal disruption during the construction phase.
- The design and layout utilise the existing vehicle access to the site for both light and heavy vehicles and minimises additional traffic generation through the consolidation of manufacturing operations, storage and distribution within one site.
- Whilst the built form and bulk of the proposed development is largely dictated by the engineering and logistical requirements of the intended purpose, it is entirely consistent with the character of the surrounding Huntingwood Industrial Precinct and will incorporate high-quality materials and finishes.

- The proposal involves significant replacement tree planting of 272 trees to mitigate the loss of planted native vegetation and filter views to and reduce the visibility of the proposed development from the public domain.

The proposal is highly suitable for the site:

The proposal will allow the expansion of the existing food processing facility within the site, which is permissible with consent and consistent with the IN2 Light Industrial Zone objectives. Further, there are no significant environmental constraints that would limit the proposal from being developed at the site.

The proposal is in the public's best interest:

- The proposed development will accommodate up to 229 FTE jobs during the construction phase, and 273 direct FTE jobs once complete and fully operational. The proposal will stimulate local investment and contribute significant economic output and value add to the economy each year. This project is fully funded and 'shovel ready' for commencement of construction as soon as possible next year.
- Subject to the various mitigation measures recommended by the specialist consultants, no adverse, social or economic impacts will result from the proposal in terms of traffic, noise and vibration, air quality and odour or views during construction and ongoing operation of the facility. Based on the assessment of noise, air quality and traffic, the proposal will not result in any adverse cumulative impacts.
- Engagement with relevant community, government and agency stakeholders has been undertaken with respect to the proposed development, with no major issues having been raised through the consultation processes.
- It can be concluded that on balance, the benefits of the development outweigh any adverse impacts and as such, the development is in the public interest.

In view of the above, it is considered that this SSDA has significant merit and should be approved subject to the implementation of the mitigation measures described in this report and supporting documents.

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