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URBIS

SUBMISSIONS REPORT

SSD-36138263 | Augusta
Street Warehouse and
Distribution Centre

Prepared for
**THE TRUSTEE FOR HUNTINGWOOD PROPERTY
TRUST**
26 March 2024

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Report Number	Final – 26 March 2024

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EXECUTIVE SUMMARY

This Submissions Report has been prepared on behalf of The Trustee for Huntingwood Property Trust (**the Applicant**) to address the matters raised by government agencies, local Council, the community and relevant stakeholder groups during public exhibition of the proposed development at Augusta Street, Huntingwood.

The State Significant Development Application (**SSDA**) SSD-36138263 was lodged with the (then) Department of Planning, Environment, now Department of Planning, Housing and Infrastructure (**DPHI**), in accordance with Section 4.36 of the *Environmental Planning & Assessment Act 1979 (EP&A Act)*.

DPHI issued a letter to the Applicant on 21 November 2023 requesting a response to the issues raised during the public exhibition of the application. The following specific matters were identified by DPHI in their Request for Additional Information:

- Bulk and Scale
- Visual
- Noise impacts
- Traffic
- Biodiversity
- Ecologically Sustainable Development
- Management and Mitigation Measures

This Submissions Report outlines the proposed refinements and responds to all concerns raised within submissions.

Overview of Submissions

The SSDA was on public exhibition between 10 October 2023 and 6 November 2023. A total of 17 submissions were received from NSW government agencies, Blacktown City Council and individuals, including:

- Environment and Heritage Group
- Endeavour Energy
- Environmental Protection Authority
- Fire and Rescue NSW
- Heritage Council of NSW
- Heritage NSW
- Sydney Water
- Transport for NSW

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

- The project.
- Procedural matters.
- Environmental impacts.

Based on the above categories, this Submissions Report provides a response to the key issues at **Section 4**.

Actions Taken Since Exhibition

Since the SSDA was publicly exhibited, the Applicant has undertaken further consultation with DPHI, Sydney Water and Endeavour Energy to discuss the issues raised within their submissions. Additional assessments have also been prepared to respond to the issues raised within the submissions. These include:

- Civil Engineering Report
- Noise and Vibration Impact Assessment
- Visual Impact Assessment
- Transport & Accessibility Impact Assessment
- Biodiversity Development Assessment Report
- Aboriginal Cultural Heritage Assessment Report Memorandum
- Infrastructure Response Memorandum
- Fire Safety Response Memorandum

Response to Submissions

The Applicant has updated the proposed development in response to the submissions and stakeholder consultation. The key changes are summarised as follows:

- Refinement of the Warehouse 5 architectural design and material palette to soften the bulk and scale of the built form including:
 - Increase of Warehouse 5 eastern setback to 8m, with associated reconfiguration of internal road, ramp and warehouse elements.
 - Modulation of Level 2 office roofline.
 - Reconfiguration of office areas to accommodate revised external stairway and incorporation of planting, acting as additional screening and variation within the north façade treatment.
 - Externalising of office stairway elements to the façade plane with introduction of face brick cladding.
 - Replacement of Monument Colorbond colour palette with 'Woodland Grey' on the façade panels.
 - Relocation of pattern element on the façades from the Level 2 to the Level 1.
 - Introduction of vertical aluminium extrusion accent battens along Level 2 northern elevation.
- Extension of western boundary setback to 8 metres for Warehouse 5 with associated design, internal road and ramp reconfigurations.
- Screening of all fire tanks across the site with vertical batten screening.
- Relocation of the Onsite Stormwater Detention (**OSD**) basin within the western swale to beneath the Warehouse 3/4 southern hardstand area.
- Relocation and reconfiguration of the OSD basin within Blacktown Creek to contain it within the easement for construction 9 wide.
- Change in Gross Floor Area (**GFA**) allocation within Warehouse 5:
 - Warehouse Area = 59,621m² (-1,822m²)
 - Office Area = 3,594m² (+304m²)
- Reconfiguration and change of Warehouse 2 car parking area to be turf cell permeable paving.
- Increase total number of tree plantings to 2087 (+87 plantings), increasing tree canopy coverage to 18.6%.

Updated Justification and Evaluation

The EIS lodged with SSD-36138263 assessed the development in accordance with relevant planning instruments and policies and outlined mitigation measures to avoid unreasonable or adverse environmental effects. The EIS was also prepared to respond to the Secretary's Environmental Assessment Requirements (**SEARs**) issued for the project.

The key issues identified in the SEARs were assessed in detail, with specialist reports underpinning the key findings and recommendations identified in the Assessment of Impacts. It has been demonstrated that for each of the likely impacts identified in the assessment of the key issues, the impact will either be positive or can be appropriately mitigated.

This Submissions Report (including supporting appendices) considers all submissions made during the exhibition period, provides an updated assessment where required and comprehensively responds to the matters raised by DPHI, Blacktown City Council, Government Agencies and the public.

The proposal continues to represent 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:

- NSW State Priorities
- Greater Sydney Region Plan: A Metropolis of Three Cities
- Our Greater Sydney 2056: Central City District Plan
- Future Transport Strategy 2056
- Blacktown Local Strategic Planning Statement

- **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:

- *Biodiversity Conservation Act 2016 (BC Act)*
- *Roads Act 1993 (Roads Act)*
- *Environmental Planning and Assessment Act 1979 (EP&A Act)*
- *Environmental Planning Assessment Regulation 2021 (EP&A Regulation)*
- *State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP)*
- *State Environmental Planning Policy (Resilience and Hazards) 2021 (R&H SEPP)*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&I SEPP)*
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021 (B&C SEPP)*
- *State Environmental Planning Policy (Industry and Employment) 2021 (I&E SEPP)*

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

- The site is highly accessible to Western Sydney and the Greater Sydney area, with connections to the Great Western Highway, Prospect Highway and M4 Motorway.
- The proposal will optimise the use of vacant and cleared industrial zoned land to deliver warehouse and distribution premises to service the growing population in Western Sydney.
- The proposed development results in a built form which responds to the site controls and Blacktown Creek riparian corridor, reinvigorating the vegetation and waterway and providing for employee amenity and enhanced biodiversity outcomes.

- Dense landscaping and acoustic mounds along the Great Western Highway will avoid unacceptable visual or noise impacts to the residential land north of the site.
- The design and layout responds to the functional and spatial requirements necessary to deliver a warehouse and distribution precinct and is compatible with the scale and character of other warehouse developments in the Western Sydney Employment Area.

- **The proposal is highly suitable for the site**

Each of the planning and technical specialist assessments have been considered in determining the suitability of the site to accommodate the warehouse and distribution centre. The site is considered highly suitable for the proposed development for the following reasons:

- The proposed land use is permissible with consent in the IN1 General Industrial zone under the I&E SEPP.
- The proposal is consistent with relevant State and local strategic and statutory policy.
- The site is well connected to the motorway network of Western Sydney, being adjacent to the Great Western Highway, Prospect Highway, and M4 Motorway.

- **The proposal is in the public interest**

The proposed development is considered in the public interest for the following reasons:

- The proposal will provide up to 651 full time jobs during the construction phase, and up to 908 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 redevelopment of the site will deliver critically needed industrial floor space close to Western Sydney. The Project is fully funded and 'shovel ready' for commencement of construction as soon as possible in Q2 2024.
- The proposal incorporates comprehensive landscaping to present an attractive appearance when viewed from the surrounding road network, minimise the potential visual impacts from the residential properties and heritage-listed church and enhance biodiversity outcomes.
- A comprehensive assessment has been undertaken of the potential environmental impacts and it has been demonstrated that all matters can be satisfactorily mitigated, minimised or managed to avoid any unacceptable impacts.
- The proposal meets sustainability benchmarks and incorporates best-in-class sustainable initiatives to achieve an environmentally responsible design.
- It can be concluded that on balance, the benefits of the proposal outweigh any adverse impacts and as such, the development is in the public interest.

In view of the above, it is considered that this SSD Application 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 warehouse and distribution centre precinct at Augusta Street, Huntingwood (**the site**). It has been prepared on behalf of the Applicant to address the matters raised by public agencies, local Council, the community and other relevant stakeholders throughout the public exhibition period.

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

1.1. EXHIBITED PROJECT

The State Significant Development Application (**SSDA**) was lodged with DPHI in October 2023 (SSD-36138263). The SSDA was placed on public exhibition for 28 days between 10 October 2023 to 6 November 2023.

The SSDA proposed to consolidate the industrial zoned land to deliver a best-in-class industrial warehouse and distribution precinct comprised of three single-storey warehouses and one multi-storey warehouse to capitalise on its interconnected location. The SSDA sought consent for:

- Site earthworks, including cutting and filling, required to deliver large-scale warehouse buildings.
- Construction and fit-out of four buildings (comprising 15 warehouse tenancies) including:
 - Warehouse Building 1, single-level (maximum building height 16.8m)
 - Warehouse Building 2, single-level (maximum building height 16.8m)
 - Warehouse Building 3 & 4, single-level (maximum building height 16.8m)
 - Warehouse Building 5, multi-level (maximum building height 34.84m)
- A total of 134,565m² of gross floor area (GFA) will be provided in the above buildings, comprising:
 - Warehouse: 128,027m²
 - Office: 6,538m²
- Vehicle access to Warehouses 1-4 is via Augusta Street and Flushcombe Road. A new intersection providing access from the Great Western Highway and Prospect Highway enables access to Warehouse 5.
- On-site car parking provision of 951 spaces, including an overflow car parking area to satisfy Council's parking requirements, as well as forecast demand.
- Riparian planting and landscaping within the conservation areas and along the site boundaries.
- Business and building identification signage.
- Consolidation of the existing lots and subdivision into three Torren title lots.

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	Submissions Register	Urbis
Appendix B	Updated Mitigation Measures	Urbis
Appendix C	List of Plans for Approval	Urbis
Appendix D	Architectural Plans	PACE Architects
Appendix E	Architectural Design Report	PACE Architects

Appendix F	Landscape Plans	Habit8
Appendix G	Civil Report & Drawings	Costin Roe Consulting
Appendix H	Visual Impact Statement (VIA)	Habit8
Appendix I	Noise and Vibration Impact Assessment (NVIA)	SLR
Appendix J	Traffic and Access Impact Assessment (TAIA)	CBRK
Appendix K	Biodiversity Development Assessment Report (BDAR)	Anne Clements & Associates
Appendix L1	Ecologically Sustainable Development (ESD) Report	E-LAB
Appendix L2	Net-Zero Carbon Statement	E-LAB
Appendix M	Remediation Action Plan (RAP)	JBS&G
Appendix N	Long-Term Environmental Management Plan (LTEMP)	JBS&G
Appendix O	Aboriginal Cultural Heritage Assessment Report (ACHAR) Memorandum	Coast Heritage
Appendix P	Infrastructure Response Memorandum	Land Partners
Appendix Q	Fire Safety Response Memorandum	Affinity Fire Engineering
Appendix R	Intersection Diagrams	MU Group
Appendix S	Sydney Water Response Memorandum	Vinculum Advisory
Appendix T	Vegetation Management Plan	Anne Clements & Associates

2. ANALYSIS OF SUBMISSIONS

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

2.1. BREAKDOWN OF SUBMISSIONS

The SSDA was publicly exhibited between 10 October 2023 and 6 November 2023. There were ten submissions received from public agencies and the local Council, and eight submissions received from special interest groups, members of the local community and individuals.

All submissions were managed by DPHI, which included registering and uploading the submissions onto the 'Major Projects website' (SSD-36138263). A breakdown of the submissions made by group and issues raised is provided in **Table 2**.

Overall, nine groups either supported or commented on the project and eight objected to the project based on the submissions received. Most issues raised in submissions related to the environmental impact of the proposal as set out in **Section 2.2**.

Table 2 Breakdown of Submissions Received

Submitter	Category of Issues Raised						
	The Project	Procedural Matters	Impacts			Justification and Evaluation of the Project	Issues Beyond the Scope of the Project
			Economic	Environmental	Social		
Department of Planning Housing & Infrastructure (DPHI)	1	1	0	5	0	0	0
Blacktown City Council (Council)	1	0	0	5	0	0	0
Public Authorities (State or Commonwealth Agencies)							
Environment and Heritage Group (EHG)	0	0	0	2	0	0	0
Endeavour Energy	0	0	0	0	0	0	0
Environmental Protection Authority (EPA)	0	0	0	0	0	0	0
Fire and Rescue NSW (FRNSW)	0	0	0	0	0	0	0
Heritage Council of NSW	1	0	0	0	0	0	0
Heritage NSW	0	0	0	1	0	0	0
Sydney Water	1	0	0	3	0	0	0
Transport for NSW (TfNSW)	0	0	0	2	0	0	0
Individuals – (Local <5km)	2	1	0	5	0	0	0
TOTAL	5	1	0	23	0	0	0

2.2. CATEGORISING KEY ISSUES

Given the scope of matter raised, responses have been provided to all items raised by DPHI, Blacktown City Council and Government Agencies.

Responses have been provided for public submissions consistent with the thematic categorisation above, outlined in **Table 3** below.

Table 3 Categorising Public Submission Issues Raised

Category of Issue		Summary of Matters Raised
The project	Physical layout and design	<ul style="list-style-type: none"> The proposal will be larger in size than existing residences. The size and location will change the landscape of the local residents.
Procedural matters	Identification of relevant statutory requirements	<ul style="list-style-type: none"> Proposal has not adequately addressed the requirements of Section 2.20 and 2.22(a) – (e) from the Industry and Employment SEPP.
Economic, Environmental and Social Impacts	Noise Impacts	<ul style="list-style-type: none"> The noise generated by trucks, forklifts and general operations on residents (some within 200m) will be too great, given the 24/7 operation of the site.
	Traffic Impacts	<ul style="list-style-type: none"> The junction at the intersection of the Great Western Highway and Flushcombe Road is affected by high levels of traffic southbound along Flushcombe Road turning onto the highway. The proposal will further exacerbate this. Safety of motorists at the Flushcombe Road / Great Western Highway intersection will be further impacted by the proposal.
	Landscape / Biodiversity	<ul style="list-style-type: none"> Removal of existing grassland will affect local animals that frequent the area. The proposed development could drive these animals into the northern residential area.
	View Impacts	<ul style="list-style-type: none"> Size of development will impact view from residences.
	Climate Impact	<ul style="list-style-type: none"> The rooftops of the four buildings with concrete car parking area will result in increased urban heat island effect.

	Aboriginal Consultation	<ul style="list-style-type: none"> Given artifacts were found on the site, the development should consider amending the design to ensure Aboriginal Heritage is not lost.
Justification and evaluation of the project	No issue raised.	N/A
Issues beyond the scope of the project or not relevant to the project	No issue raised	N/A

3. ACTIONS TAKEN SINCE EXHIBITION

In response to the key issues raised within the submissions, minor design refinements and clarifications have been made to the proposed development since public exhibition.

This section summarises the changes that have been made to the project since its public exhibition. It also outlines the additional assessment undertaken to respond to the concerns raised with the public agency, organisation and public submissions outlined in **Section 2**.

3.1. FURTHER ENGAGEMENT

Since the public exhibition of the SSDA between 10 October 2023 and 6 November 2023, the Applicant undertaken further consultation with DPHI, Sydney Water and Endeavour Energy.

Table 4 Further Engagement Summary

Authority	How this group was consulted	Issue	Feedback	Project Response
DPHI	2x Virtual meetings (19/12/23 & 13/02/24) Site Visit	Clarification regarding approach to bulk and scale issues raised and other submission matters.	Further consideration to be given to architectural treatment and materiality of Warehouse 5 northern façade to reduce potential visual impact and address residential compatibility. Endeavour Energy should be consulted regarding the relevant issues in their submissions. Categorisation of the western swale needs to be justified. The detailed Construction Management Plan can be provided via a post approval condition.	The northern façade of Warehouse 5 has been amended to respond to refine the architectural treatment and reduce potential visual impact. Comprehensive assessment, especially regarding Section 2.22 (2)(a) of the Industry and Employment SEPP, has been provided. Endeavour Energy was consulted as part of the Submissions Report. Responses to Endeavour Energy submissions are provided at Table 7 . The western swale is not a categorised watercourse within the meaning of the <i>Water Management Act 2000</i> . Detailed justification has been provided in Table 6 . A Construction Management Plan will be provided at the CC stage.

Sydney Water	Via email & Virtual meeting (24/01/24)	Clarification on issues raised in SW built form easement issue	Confirmed the approach include the future OSD basin within the easement for water supply provided sufficient information is provided on the location of the basin.	The design and location of the OSD basin is included in the Civil Engineering Drawings. The OSD basin has been relocated and reconfigured within the “easement for construction 9 wide (DP1216918)” as detailed in correspondence with Sydney Water on 9 February 2024.
Endeavour Energy	Via email	Clarification regarding approach to responding to EE submissions.	Address relevant matters from all of EE’s submissions to provide as much information as possible from the outset.	Responses to the matters in EE submissions have been provided at Table 7 .

3.2. REFINEMENTS TO THE PROJECT

The following table summarises the minor refinements and clarifications proposed since public exhibition and in response to submissions made, and as a result of further engagement with DPHI.

Importantly, these refinements are changes that fit within the limits set by the project description. These refinements do not change what the application is seeking consent for. Therefore, an amendment to the proposal is not required within the meaning of section 37 of the *Environmental Planning & Assessment Regulations 2021*.

The proposed refinements to the exhibited scheme in response to the submissions include the following:

- Refinement of the Warehouse 5 architectural design and material palette:
 - Increase of Warehouse 5 eastern setback to 8m, with associated reconfiguration of internal road, ramp and warehouse elements.
 - Modulation of Level 2 office roofline.
 - Reconfiguration of office areas to accommodate revised external stairway and incorporation of planting, acting as additional screening and variation within the north façade treatment.
 - Externalising of office stairway elements to the façade plane with introduction of face brick cladding.
 - Replacement of Monument Colorbond colour palette with ‘Woodland Grey’ on the façade panels.
 - Relocation of pattern element on the façades from the Level 2 to the Level 1.
 - Introduction of vertical aluminium extrusion accent battens along Level 2 northern elevation.
- Screening of all fire tanks across the site with vertical batten screening.
- Relocation of the Onsite Stormwater Detention (**OSD**) basin within the western swale to beneath the Warehouse 3/4 southern hardstand area.
- Retention of 87 additional existing trees, to provide 2,087 trees across the site, increasing tree canopy coverage to 18.6%.

- Relocation and reconfiguration of the OSD basin within Blacktown Creek to contain it within the easement for construction 9 wide.
- Change in Gross Floor Area (**GFA**) allocation within Warehouse 5:
 - Warehouse Area = 59,610m² (-1,834m²)
 - Office Area = 3,584m² (+294m²)
- Reconfiguration of Warehouse 2 car parking area to be turf cell permeable paving.
- Revision of car parking areas to deliver a total 946 car parking spaces:
 - Warehouse 1: 67 spaces
 - Warehouse 2: 106 spaces
 - Warehouse 3 / 4: 346 spaces
 - Warehouse 5: 427 spaces

Figure 1 Warehouse 5 Refinements



Source: PACE Architects

Refer to the revised Architectural Plans (**Appendix D**) for further details on the design refinements made since public exhibition.

3.3. ADDITIONAL IMPACT ASSESSMENT

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

- Civil Engineering Report (**Appendix G**)
- Visual Impact Assessment (**Appendix H**)
- Noise and Vibration Impact Assessment (**Appendix I**)
- Transport & Accessibility Impact Assessment (**Appendix J**)
- Biodiversity Development Assessment Report (**Appendix K**)
- ESD Report / Net Zero Carbon Statement (**Appendix L**)
- Remediation Action Plan (**Appendix M**)

- Long-Term Environmental Management Plan (**Appendix N**)
- Aboriginal Cultural Heritage Assessment Report Memorandum (**Appendix O**)
- Infrastructure Response Memorandum (**Appendix P**)
- Fire Safety Response Memorandum (**Appendix Q**)
- Intersection Diagrams (**Appendix R**)
- Sydney Water Response Memorandum (**Appendix S**)
- Vegetation Management Plan (**Appendix T**)

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

4. RESPONSES TO SUBMISSIONS

Provided the extent of submissions received during the public exhibition process from DPPI, NSW government agencies, Blacktown City Council, and public submissions, responses to the issues raised have been provided in the following tables:

- Department of Planning, Housing and Infrastructure (**Table 5**)
- Blacktown City Council (**Table 6**)
- NSW Government Agencies (**Table 7**)
- Resident submissions received during the public exhibition, as categorised in Table 3 (**Table 8**).

Table 5 Response to DPHI RTS Request Letter, dated 21 November 2023

Summary of Issue Raised	Response	Supporting Documentation
<p>Bulk and Scale</p> <p>The Department raises concern with the bulk and scale of the development, particularly the building height and proximity to nearby residential land. Section 2.20 of the State Environmental Planning Policy (Industry and Employment) 2021 (Industry and Employment SEPP) requires the consent authority to be satisfied the development's building height would not adversely impact on the amenity of adjacent residential areas.</p> <p>Furthermore, Section 2.22(2)(a) of the Industry and Employment SEPP requires the consent authority to be satisfied development on land within 250 metres of land zoned primarily for residential purposes are compatible with the building height, scale, siting and character of existing residential buildings in the vicinity.</p> <p>Based on the information presented within the EIS, the Department is not satisfied the development's building height, scale, siting and character would be compatible with existing residential buildings in close proximity to the site and may adversely impact on the amenity of residential areas in accordance with Section 2.20 and 2.22 of the Industry and Employment SEPP.</p>	<p>DPHI were consulted during the RtS process to clarify the intent of bulk and scale issues raised. Warehouse 5 was identified as requiring further architectural treatment and materiality refinement along the northern façade. Potential visual impact and greater levels of compatibility with the northern residential area were identified as critical to comply with Section 2.20 and the following requirements of Section 2.22 of the Industry and Employment SEPP:</p> <p><i>(2) The consent authority must not grant consent to development on land to which this section applies unless it is satisfied that—</i></p> <p><i>(a) wherever appropriate, proposed buildings are compatible with the height, scale, siting and character of existing residential buildings in the vicinity, and</i></p> <p>...</p> <p><i>(c) the elevation of any building facing, or significantly exposed to view from, land on which a dwelling house is situated has been designed to present an attractive appearance, and</i></p> <p>...</p> <p><i>(g) the site of the proposed development will be suitably landscaped, particularly between any building and the street alignment.</i></p> <p>In response to the matters raised, the Applicant and PACE Architects have revised the Warehouse 5 northern elevation to better respond to these statutory requirements and have sought to further mitigate potential visual impact for residents north of the site.</p> <p>Building Height & Scale</p> <p>The height and scale of the multi-storey Warehouse 5 has been addressed through the reconfiguration of Level 2 building elements and reorganisation of façade to draw attention away from the upper areas and ridge line of the building.</p> <p>The patterned façade panelling previously along Level 2 of Warehouse 5 has been moved to Level 1, providing the same level of articulation but directing</p>	<p>Appendix D</p> <p>Appendix E</p> <p>Appendix F</p> <p>Appendix H</p>

attention away from the ridgeline. In tandem, the vertical articulated battens layered along Level 2 mute the building bulk by effectively removing any areas of blank panel façades. The battens introduce a gradual fade effect to the façade, the effect is an overall softening the bulk building form.

The scale of Warehouse 5 has been considered by focussing on the office elements as key articulation points. Warehouse roof elements above the office areas have been recessed, pushing certain elements of the warehouse form further away from the northern boundary and effectively extending the building setback at certain areas by approx. 6m. This introduces a dynamic building element that breaks up the building form and scale. All covered outdoor areas for Level 1 mezzanine offices have also been redesigned to raise the ceiling heights effectively offering 2-storey high landscaped recesses. Combined with the landscape planters included within each office area, the negative spaces offer greater variation in the façade and break up the building form.

These strategic architectural amendments massaging the building form to create a more compatible and less impactful building form are highlighted in Viewpoint 3A from the amended VIA. A comparison between formal lodgement and amended scheme are shown in the following extracts.

Formal Lodgement Warehouse 5 Design



Source: Habit8

Amended Warehouse 5 Design



Source: Habit8

Siting

The layout and master planning of the proposal were deliberate in considering potential visual impact to residents north of the Great Western Highway. The setbacks provide 20m of landscaping with large canopy trees providing screening to the northern residences. The Great Western Highway divides the site in concert with the setbacks, delineating the industrial warehouse and distribution centre from the residential areas. The Great Western Highway provides a separation of approx. 70m from the nearest residences along Brae Street, increasing for other residences.

The single level warehouses (Warehouse 1-4) are located along the eastern side of Blacktown Creek where residences at Brae Street and Desley Crescent have reduced screening by vegetation on the northern side of the Great Western Highway. The amended VIA shows Viewpoints 7A to 8E range in impact from 'moderate' to 'minor' as most dwellings sit below the berm and lower than the road reserve.

For multi-level Warehouse 5 building, the closest residences at Hampton Crescent and Chapel Circuit are set topographically lower than the Great Western Highway with views impeded by the acoustic wall currently under construction for the Prospect Highway upgrade. These site considerations combined with the landscape screening result in Warehouse 5 having a 'minor' to 'negligible' impact on the northern residences at Hampton Crescent and Chapel Circuit. The exception to this being Viewpoint 3a from 51 Hampton Crescent which has a significance of impact rating of 'major' to 'moderate'. In this case especially, the 20m landscape setback, vegetated screening on the northern side of the Great Western Highway, amended building form and materiality changes all work to buffer and effectively manage the built form of Warehouse 5.

Character & Materiality

The façade treatment and character of Warehouse 5 have been further refined. The patterned façade relocation to Level 1, integration of vertical battens along Level 2, and externalisation of office stair elements with face brick cladding are proposed to minimise focus on the ridgeline of the building. This brick façade

treatment has also been extended to the other prominent column elements along the northern façade all working to enhance building articulation whilst connecting through to the red brick material character of the northern context.

Landscape Screening

A landscape setback has been maintained in the amended Architectural and Landscape Plans, incorporating 10m and 15m (when mature) tree canopy tree planting with shrub screening below.

For Warehouses 1, 2 and 3/4, a consistent level of screening is provided to the northern residents, contributing to the softening of their bulk building form. The stormwater management basin along a portion of Warehouse 3/4 northern elevation requires smaller tree plantings (less than 4m high). However, the topography of the northern residential land slopes away from the Great Western Highway, mitigating the visual impacts of the proposal as highlighted in Viewpoint 3B to 3F and 7A to 8E of the VIA.

The landscape screening along the Warehouse 5 northern façade serves to consolidate the architectural efforts made to reduce building bulk and scale, including reconfiguration of façade elements and greater building articulation. The visual impacts are also mitigated by the acoustic barriers associated with the new connection to the Prospect Highway (refer to Viewpoints 3C, 3D, 3E and 3F).

Overall, the combined architectural and landscape response provides for an appropriate outcome for the residents to the north and the compatibility of the development from a bulk, scale, siting, character, materiality and landscape perspective.

Visual

Further consideration of the potential impacts on view corridors to residential zoned land to the north of the site, visual screening and façade treatment options for the facades of the development is required.

The façade treatments for Warehouse 3/4 and Warehouse 5 have been revised to reduce potential impacts on view corridors to residential zoned land. Design alterations include:

- For Warehouse 5:
 - Relocation of patterned façade from Level 2 to Level 1, drawing attention away from the upper limits of the building form.

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- Introduction of vertical accent battens along Level 2 to create further blend between the façade and the landscape screening between Warehouse 5 and the residential area.
 - Incorporation of vertical batters along the ramp elements
 - Externalising of office stair elements, introducing a brick cladding façade treatment in the materiality palette. This will interconnect the proposal and prominent portions of the façade into the brick architectural character of the northern residential area.
- For Warehouse 3/4:
 - Introduction of patterned façade treatment along the western elevation with view corridors from the Pacific Highway to create further visual interest.

Highlighted in the revised VIA prepared for this RtS submission, these design changes in tandem with the existing landscape screening proposed along the Northern Boundary, the 20m minimum northern boundary setback to all warehouses and the interceding Great Western Highway all adequately address potential impacts on view corridors from the proposal.

The Department has reviewed the Visual Impact Assessment (VIA) prepared by Habit8 Pty Ltd and does not agree with the significance of impact assessed for Viewpoints 3a, 3b, 7, 8 and 11. The Department considers Viewpoint 3a, 3b and 7 to have a Very High magnitude of change and Major to Major/Moderate significance of visual impact, Viewpoint 8 to have a High magnitude of change and Moderate significance of impact, and Viewpoint 11 to have a Very High magnitude of change and Substantial significant of visual impact.

The Department requests further information to justify the magnitude of change and significance of visual impacts prescribed for Viewpoints 3a, 3b, 7 and 8. The Department additionally requests further consideration be provided to the design of the development and/or treatment options to mitigate the visual impact of the development on these receiver locations.

The VIA assessment has been undertaken in accordance with Guidelines for Landscape and Visual Impact Assessment. Section 10.1 of the VIA provides the following justification for the magnitude of change and significance of impact rating across Viewpoints 3A, 3B, 7, 8, and 11:

- **Viewpoint 3A:** The existing baseline view is interrupted by a motorway, foreground “noise/detractors” including roads, cars, houses, fences and existing vegetation. A drone was used for the Level 2 view as access to the private residence was not granted. Fences and the road reserve screen the proposed development from ground floor (shown in View 3C, 3D, 3E) and the current higher view shot would be from a future second floor which don’t have living areas. Distant views are dominated by an overgrown weed infested site, some vegetation and power lines. The interceding elements separate the proposal for the residences, the proposal not considered a ‘defining influence’ within the meaning of the ‘very high’ magnitude of change rating.

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- **Viewpoint 3B:** From formal lodgement, the magnitude of change has been downgraded to 'medium'. The proposed development is moderately affected at a medium range. It is screened by existing trees, proposed trees, an acoustic wall/slip lane and other residential houses in the foreground forming distractions/detractors from the view. It will not have a 'defining impact' on the view as it sits behind road infrastructure and existing trees as required by the 'very high' rating proposed. Further, 'very high' refers to 'close range', there the proposal is separated by a large road reserve, an acoustic barrier, landscaping and a large setback.

The VIA considers the significance of impact is considered 'minor' as the view is not sensitive. The view is taken from second floor of residences where those floors are dominated by bedrooms and bathrooms, not living areas. The view has many existing visual detractors. The view is a considerable distance from the proposed development. The view is screened by road infrastructure and existing trees. The proposed development therefore has a minor impact on these properties from this viewpoint.

- **Viewpoint 7:** Similarly to Viewpoint 3A, the existing baseline view is interrupted by a motorway, foreground noise and detractors such as roads, cars, and houses. Distant views are dominated by an overgrown weed infested site, some vegetation and powerlines. The proposal would not, therefore, be a 'defining influence' within the meaning of a 'very high' magnitude of change categorisation. As the magnitude of change has not increased, the significance of impact would not increase by proxy.
 - **Viewpoint 8:** The viewpoint is from the road reserve between the highway and the existing residential housing subdivision. An existing grassed berm and the sunken topography limit the built form impact on the residential properties. The proposed built form is slightly visible from these properties, however, there are no distant views or horizon lines affected and it is not unreasonable to see parts of a warehouse where land is zoned industrial. This is reflected in Viewpoint 8A, 8B and 8C which demonstrate minor/moderate impact to the visual receptors.
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- **Viewpoint 11:** The existing baseline view from the hill is not of high scenic quality and although the cemetery site is of important heritage significance, the view to the west is not as important or far reaching as the views from Prospect Hill to the north and east. The current view comprises a degraded weed infested site, large motorway junction and high voltage transmission towers/wires. With the proposed landscape setback and screen tree planting, the view has been assessed as a “high” magnitude of change not “very high”. This is because the proposal is not a major impact considering all the existing infrastructure and development in the locality. As per Government guideline for VIA’s, the Significance of Impact is determined by the Magnitude of Change description.

The façade treatment and bulk building form of Warehouse 5 has been amended to reduce/mitigate impacts to the northern residential receivers.

These include:

- Relocation of patterned façade from Level 2 to Level 1, drawing attention away from the upper portions of the building.
- Introduction of vertical accent battens along Level 2 to create further blend between the façade and the landscape screening between Warehouse 5 and the residential area.
- Incorporation of vertical battens along the ramp elements
- Externalising of office stair elements, introducing a brick cladding façade treatment in the materiality palette.

Furthermore, the Department notes Viewpoints 3a and 3b have been undertaken to simulate a ground floor and first floor comparison of residential receiver viewpoints on Hampton Crescent. However, this has not been undertaken for other viewpoints within close proximity to the development such as Viewpoints 7 and 8 at Desley Crescent and Tyne Place. The VIA should be updated to provide additional comparison of ground floor and first floor views at Viewpoints 7 and 8.

The amended VIA provides an additional nine viewpoints covering Desley Crescent, Brae Street, Ollier Crescent and Tyne Place to compare ground and first floor residential receivers north of the site.

Appendix H

Noise Impacts	Updated assessment provided in the points below. An amended NVIA has been provided with this Submissions Report.	Appendix I
The Department has reviewed the Noise and Vibration Impact Assessment (NVIA) prepared by SLR Consulting Australia Pty Ltd and raises a number of comments (see below) to be addressed in an amended NVIA.		
The Department notes noise monitoring and receiver locations assessed within residential areas are located adjacent to the Great Western Highway and the development site. The Department requests clarification and suitable justification for the exclusion of noise monitoring and receiver location assessment in Oliver Crescent and the northern portion of Chapel Circuit to ascertain the comparison of noise impacts at both extents of the receiver location. Otherwise, the Department requests these locations to be included in background monitoring data.	<p>Noise monitoring was conducted at locations representative of the potentially most affected residences surrounding the project in accordance with Table A1 of the NPfI.</p> <p>The receivers closer to the highway and the proposal in NCA01 and NCA02 have an acoustic environment consistent with the description of an urban environment in the NPfI. At the northern-most extent of these Noise Catchment Areas (NCAs) further from the highway, the background acoustic environment may be quieter. As a result, these NCAs have been classified as suburban to be representative of the whole catchment area.</p> <p>SLR also reviewed noise monitoring conducted at 94 Oliver Crescent (setback 200m from the great western highway) as part of the Sydney International Speedway EIS (SLR 2020). This study had determined Rating Background Levels (RBLs) for receivers on Oliver Crescent as 43 dBA Daytime, 43 dBA Evening and 38 dBA Night-time. Background noise levels at Oliver Crescent were also dominated by road traffic noise from the Great Western Highway.</p> <p>The adopted criteria are expected to be conservative at receivers of a similar offset distance from the highway, by 5dB for the evening at both NCA01 and NCA02 and at night 2dB in NCA01 and 4dB in NCA02. The daytime RBLs at the nominated alternative locations would result in a lower intrusive limit of 48 dBA at further setback receivers, however this would not be representative of the most impacted receivers in NCA01 and NCA02. Should the criteria from these two locations be applied, the predicted day time noise levels are still below that criteria. Additional noise monitoring would not change the overall of the assessment.</p> <p>The NVIA presents impacts at receivers representative of the most impacted residences from the proposal. Noise impacts to all other receivers, including</p>	Appendix I

	receivers on Oliver Crescent and Chapel Circuit are presented in the operational noise contours provided in Appendix D.	
The NVIA has included sound power levels for heavy vehicles using ramps for Warehouse 3-4. However, it is unclear where the location of the ramps for Warehouse 3-4 is on the site. The Department requests Figure 5 of the NVIA to be updated to clearly identify all ramps as separate modelled noise sources.	Figure 6 and 7 within the NVIA have been prepared to clearly identify all ramps as separate modelled noise sources. Previously Warehouse 3-4 hardstand area was incorrectly labelled as a ramp. This has been updated.	Appendix I
The NVIA should also be revised to incorporate each distinct outdoor operation corresponding to forklift operations as well as heavy vehicles idling, passing by, accelerating and reversing (including the contribution of energy-average noise emission associated with non-tonal reversing alarms). This would involve changes to modelled sound power levels for onsite vehicle movements and source path footprint. In addition, the representative duration of noise emission for each distinct operation should also be amended accordingly. The operational noise modelling should consider 'worst-case' emission scenarios.	The noise sources in Table 20 are each modelled within the hardstand areas shown in Figure 5 to Figure 7 of the NVIA. The representative duration of each source is applied per vehicle based on the corresponding number of sources considered in the modelled scenarios. For example trucks with reversing alarms duration are 30s per truck, 60s for two trucks and reversing alarms, initiative following that pattern. These represent the 'worst case' emission scenarios for the proposal.	Appendix I
The NVIA adopts a vehicle speed of 20 km/h for heavy trucks (26 m B-Doubles) and rigid trucks (12.5 m) while accelerating up ramps for Warehouse 3-4 and 5. The Department notes that actual operational data collected at three distribution centres in NSW suggests 11m rigid truck and semi- trailers moving up ramp would generally be limited to no more than 10 km/h (see SSD-49400209). Vehicle speed affects the duration of noise emission which in turn affects the calculated LAeq,15min. As such, please adopt a speed of no more than 10 km/h unless otherwise justified with actual operational data.	The NVIA has been updated to accommodate 10km/h vehicle speed for heavy trucks and medium trucks moving up the Warehouse 5 ramps. Refer to Table 19 within the NVIA.	Appendix I
Further to the above, the NVIA should include a reversing movement speed for heavy vehicles of 5km/h unless otherwise justified with actual operational data.	The Truck Reversing Alarm SWL of 107 dBA adopted in the NVIA, noted in Table 20, includes a truck reversing at slow speed with the use of a reversing alarm.	Appendix I

<p>The Department notes the NVIA has modelled truck and forklift reversing alarms as occurring for a duration of 30 seconds and 90 seconds, respectively during a 15-minute worst case period. The Department seeks clarification as to whether the modelled duration of reversing alarms is a maximum total duration the 15-minute period or a duration per vehicle.</p>	<p>The modelled duration of reversing alarms is applied per vehicle based on the number of sources listed in Table 22 of the NVIA.</p> <p>30 second and 90 second truck and forklift reversing durations are also based on the number of sources in Table 22, a note included in Table 20 of the NVIA to confirm this.</p>	<p>Appendix I</p>
<p>Further, the Department seeks supporting operation data to justify the modelled duration of 30 seconds and 90 seconds for truck and forklift reversing.</p>		
<p>It is unclear whether the height of noise sources and height of sensitive receivers has been considered in the operational noise modelling. The NVIA should be updated to clearly identify all variables within the operational noise model including, but not limited to:</p> <ul style="list-style-type: none"> ▪ height of noise sources (Note: It is unclear whether the level 2 of Warehouse 5 noise sources have been considered in the noise modelling) ▪ location of noise sources ▪ height of receptors (Note: It is unclear whether the noise model has appropriately considered the variation in levels between the site and receivers, and any two-storey receivers in the vicinity of the site). 	<p>Section 4.2.7 has been added to the NVIA to summarise all use adjusted model variables included in the assessment.</p>	<p>Appendix I</p>
<p>The Department notes the NVIA did not include an assessment of off-site road traffic noise impacts as the development is not predicted to increase Great Western Highway traffic by more than 60%. However, the development involves a new access from the Great Western Highway including a deceleration lane for heavy vehicle access adjacent to residential receivers. The Department requests the noise generation associated with heavy vehicle deceleration from the Great Western Highway to access the site</p>	<p>Section 5.4 of the NVIA provides assessment of off-site road traffic noise from the development, including heavy vehicle manoeuvring for Warehouse 5 access from the new Great Western Highway intersection.</p> <p>The assessed day and night increases are less than 2.0dB, which represents a minor impact. Potential impact on surrounding roads is expected to be negligible and the NVIA concludes no considerations of mitigation is required.</p>	<p>Appendix I</p>

<p>should be considered in the assessment of operational noise impacts.</p>	<p>The operational noise model was updated to reflect the latest site layout, onsite traffic information and vehicle breakdowns. The sleep disturbance assessment has been updated to reflect these changes and the proposed mitigation measures, confirming the R01 receiver no longer exceeds the sleep disturbance screening criteria because of truck air-breaks.</p>	<p>Appendix I</p>
<p>The assessment of sleep disturbance predicts an exceedance of 2 dBA at the R01 receiver location as result of heavy truck airbrakes. The NVIA states that the majority of trucks utilising the site during the night-time period would be rigid vehicles which do not use airbrakes. However, the operational modelling scenario has considered 1 heavy truck and 1 rigid truck each at Warehouse 3-4 and Warehouse 5 during a 15-minute worst case period. Therefore, the Department does not consider this statement of the NVIA to be justifiable for the exceedances to the sleep disturbance criteria and further justification or suitable mitigation measures to reduce sleep disturbance should be provided.</p>	<p>With the feasible and reasonable mitigation measures implemented, the predicted operational noise levels meet the criteria at all nearby sensitive receivers. The effectiveness of the individual walls and mounds are further detailed in Table 34.</p> <p>The acoustic wall adjacent the Warehouse 1 hardstand is expected to provide benefit of up to 6dB reduction and the acoustic wall along the northern boundary of the Warehouse 3/4 truck access road expected to provide benefit of up to 5dB reduction.</p>	<p>Appendix I</p>
<p>The Department notes that the construction noise assessment has conservatively assumed the future noise barrier on the Great Western Highway off ramp adjacent to NCA02 receivers would not be installed prior to the commencement of construction activities. However, it is not clear if the noise barrier has been considered in the assessment of operational noise impacts of the development. Furthermore, the Department requests further information on the relevant noise modelling parameters and inputs associated with the noise barrier to inform the predicted operational impacts.</p>	<p>The noise barrier on the Great Western Highway off ramp has now been constructed. The construction and operational noise assessment has been updated to incorporate this noise barrier in the noise assessment.</p>	<p>Appendix I</p>

<p>With consideration to the above comments, the Department is not currently satisfied noise generation from fixed sources or motor vehicles associated with the development will be effectively insulated or minimised in accordance with Section 2.22 (2)(d) of the Industry and Employment SEPP.</p>	<p>Provided the responses provided above and the mitigation measures nominated, the proposal effectively insulates and minimising noise in accordance with section 2.22(2)(d) of the Industry and Employment SEPP.</p>	<p>Appendix I</p>
<p>Traffic</p> <p>The Traffic Impact Assessment (TIA) prepared by Colston Budd Rodgers & Kafes Pty Ltd identifies that traffic counts surveying of the Great Western Highway and Flushcombe Road intersection was undertaken in October 2022. The traffic survey data is now 12 months old and is not clear if it was undertaken during a school holiday period which potentially does not accurately reflect traffic volumes. Suitable justification for the use of this data or alternatively more current data should be used to inform traffic flows.</p>	<p>Traffic counts undertaken in late October 2022 were outside a school holiday period. These traffic counts are considered appropriate as:</p> <ul style="list-style-type: none"> ▪ There were no COVID restrictions on travel at that time. ▪ October 2022 traffic flows were similar to 2019 pre-COVID traffic flows at the Flushcombe Road / Great Western Highway intersection. ▪ The effects of COVID on journey to work travel patterns have resulted more people working from home and a lower growth in traffic than pre-COVID. 	<p>Appendix J</p>
<p>The TIA sets out the typical weekday distribution of traffic generation in Table 7.2. The Department requests the TIA to be updated to include supporting operational data to justify the distribution of traffic generation.</p>	<p>Assumptions informing typical weekday distribution of traffic generation have been taken from the LOGOS Villawood warehouse and distribution development. Table 7.3 has been updated to provide a more comprehensive breakdown of a potential typical weekday traffic generation, noting that traffic generation is affected by tenant mix.</p>	<p>Appendix J</p>
<p>Biodiversity</p> <p>The Biodiversity Development Assessment Report (BDAR) prepared by Anne Clements & Associated Pty Ltd is requested to be updated to provide further assessment on the potential in-direct impacts of the development on potential fauna species with consideration to noise, traffic and light pollution.</p>	<p>Additional information has been provided on indirect noise, traffic and light impacts on potential fauna species at Section C.8 of the BDAR.</p> <p>Mitigation measures targeting the indirect impacts of the proposal have been integrated into the Updated Mitigation Measures at Appendix B.</p>	<p>Appendix K Appendix B</p>
<p>The BDAR should be updated to provide detailed information on the extent and processes involved with the targeted site surveying undertaken to demonstrate the site surveying was done in accordance with the '<i>Surveying threatened plants and their habitats</i>' (DPIE 2020).</p>	<p>The BDAR has been updated with Section B2.3.3 providing details on the extent and processes for the targeted site surveys. The targeted site surveys were undertaken in accordance with '<i>Surveying threatened plants and their habitats</i>' (DPIE 2020).</p>	<p>Appendix K</p>

<p>Furthermore, the BDAR does not identify the limitations of the surveying undertaken. The BDAR should be updated to include a discussion of site surveying limitations.</p>	<p>Section 2.3.3 of the BDAR notes the main limitation of the targeted surveys was the dense weed growth including 0.5m tall <i>Eragrostis curvula</i> and the monostands of <i>Rubus anglocandicans</i>. This growth is a result of the historic intense agriculture with major soil disturbance over 200 years.</p>	<p>Appendix K</p>
<p>The Department notes the BDAR recommends a Conservation Management Plan (CMP) or Vegetation Management Plan (VMP) be development in conjunction with a Construction Environmental Management Plan for the ongoing management of conservation areas. The Department requests the preparation of a draft CMP/VMP or an outline of proposed mitigation and management measures to demonstrate vegetation can be appropriately managed and conserved for the life of the development.</p>	<p>A detailed draft Vegetation Management Plan (VMP) has been prepared and provided with the BDAR. The VMP details mitigation and management measures for vegetation within Blacktown Creek and the western swale.</p>	<p>Appendix K Appendix T</p>
<p>Ecologically Sustainable Development</p> <p>The Ecologically Sustainable Development (ESD) Report prepared by E-LAB Consulting notes some materials and measures considered to address sustainability measures but does not commit to proposing any materials or measures to reduce energy consumption and improve the water efficiency of the development. The ESD Report should be updated to identify all materials and measures selected to be incorporated into the development. Furthermore, material and measure selection should be supported by energy and/or water consumption savings to demonstrate effectiveness and justification of selection.</p>	<p>The amended ESD Report has been updated and identifies the following materials and measures to reduce energy consumption and improve water efficiency across the site:</p> <ul style="list-style-type: none"> ▪ Energy <ul style="list-style-type: none"> – No gas to be used on site. – High efficiency LED lighting to be used throughout warehouse and office areas. – Installation of a 1.4mW solar photovoltaic (PV) systems across 83,100m² of roof area. – Installation of energy metres and monitoring systems to tune energy use. – High albedo roofing to be installed to reduce urban heat island effect. ▪ Water consumption and WSUD implementation <ul style="list-style-type: none"> – Low-flow water fixtures to reduce water consumption. Minimum WELS ratings have been identified for all sanitary fixtures. – Installation of efficient irrigation systems including underground surface drip systems and moisture sensors. 	<p>Appendix L1</p>

- Use of native plants in landscape approach.
- 420kL rainwater tanks to be implemented for rainwater harvesting and re-use for irrigation and toilet flushing.
- Materials
 - Jointless fibre reinforced slab.
 - Pre-cast concrete panels with recycled content.
 - >95% of steel use to be source from accredited responsible steel manufacturer.
 - Integrating of reused materials, materials with high recycled content and materials with EPDs where possible.
 - 90% of cables, pipes, flooring, blinds either:
 - Do not contain PVC.
 - Meet best practice guidelines for PVC.

Section 2.4 of the ESD Report identifies strategies for meeting Net Zero 2050 targets. However, the ESD Report does not identify actions and measures to achieve these strategies. The ESD Report should be updated to provide further detail on the identified strategies.

A Net-Zero Carbon Statement has been prepared by E-LAB which identifies actions and measures to achieve the applicant's Net Zero 2050 targets. These include:

- Operational stage's energy consumption will be entirely sourced from renewable sources such as the PV solar panel systems.
- Design interventions such as high-performing façades, utilising strategically placed eaves, awnings, shade systems and landscaping to reduce load on HVAC systems.
- High-performance building systems, such as energy efficient LED lighting, energy metering and monitoring, integration of WSUD principles, and water recycling within the bioretention and detention basins.

The implementation of these systems will result in estimated annual Greenhouse Emissions from the proposal of 4,472,238t CO₂-e. These will decrease as the electrical grid achieves a Net-Zero rating, the 2050 estimate being 240,000 t CO₂-e.

Appendix L2

The ESD Report notes the development proposes on-site renewable energies through 'a large photovoltaic array', however a

The proposal incorporates indicative PV solar panel areas across all warehouse roofs. The amended ESD Report notes that the total indicative area for solar

Appendix L1

photovoltaic array has not been outlined in the EIS project description or incorporated into the design of the development. The Architectural Plans and Design Report should be updated to include the photovoltaic array as part of the development.	panels of 83,100m ² across the five warehouses and a total estimated energy generation of 1.4mW.	
Management and Mitigation Measures In light of the comments provided above, the list of management and mitigation measures provided in Appendix D of the EIS should be updated to reflect any corresponding updates to the technical reports (including any operational mitigation measures for noise emissions). The updated list should be provided in both Microsoft Word and PDF formats.	The Environmental Risk Assessment and Mitigations Measures document has been updated to reflect the above and all other mitigation measure updates or changes resulting from other submissions. Refer to the Updated Mitigation Measures appended to this Submissions Report.	Appendix B

Table 6 Response to Blacktown City Council Letters, dated 6 November 2023 and 17 November 2023

Summary of Issue Raised	Response	Responsibility
Planning Matters 1. The Pre-Application Meeting held in June 2022 required that all setback areas were to be landscaped and maintained as open areas only, so as to enhance the streetscape appearance of the development. Council will not support car parking and internal vehicle manoeuvring except proposed driveways within these setback areas. The proposal does not comply in this regard as parking areas have been placed within the 20m southern setback to the M4 Motorway for Warehouse 2.	The Warehouse 2 car parking area has been reconfigured to be turf cell permeable paving within the 20m landscaped setback area from the southern M4 Motorway boundary. This increases the effective landscaped area on site whilst accommodating the car parking requirements for Warehouse 2. Refer to the amended Architectural Plans and Landscape Plans.	Appendix D Appendix F
2. Warehouse 5 does not comply with the minimum 20m setback from Prospect Highway requirement in the north-eastern corner of the development.	The proposal incorporates a 20m setback to the Prospect Highway from the northeastern corner.	N/A
3. Warehouse 1 and Warehouse 2 do not meet the minimum 7.5m setback requirement as per Section 10.2 of the Huntingwood DCP.	Section 10.2 (a) of Huntingwood Precinct Development Control Plan 2011 (HDCP 2011) requires a 7.5m setback for buildings interfacing with other roads besides the nominated roads. (a)(iv) qualifies this by stating a 5m secondary setback can be provided for buildings on a corner allotment.	N/A

	Warehouse 1 and Warehouse 2 are on corner allotments interfacing with Augusta Street and Flushcombe Road, both classified as 'local roads' by TfNSW. The primary frontage for both warehouses is along Augusta Street as the site is addressed from this frontage and heavy vehicle entries are off Augusta Street. A 7.5m landscape setback for both warehouses has been provided along these frontages. As the secondary frontage, a 5m landscape setback has been provided for both Warehouses along Flushcombe Road. Warehouse 1 and Warehouse 2, therefore comply with the minimum setback requirements.	
4. All fire tanks are to be suitably screened as the present form is unsightly and a visual eye-sore. The heights of these tanks are not adequately shown on the elevation plans.	All fire tanks are now shown on the elevation drawings and are screen with vertical batten screening. Refer to the Amended Architectural Plans.	Appendix D
5. The development as proposed is excessively bulky and we strongly recommend that the design be reconsidered in terms of architectural merit or breaking up the bulk of the warehouses to provide visual relief.	<p>The façade and building bulk treatment of Warehouse 5 and portions of Warehouse 3/4 have been considered and amended in response to items raised during exhibition.</p> <p>Warehouse 3/4's western façade has been amended to include the patterned façade to mitigate impacts to the Great Western Highway view corridor from this elevation.</p> <p>Warehouse 5 has been reconsidered to introduce materialities and bulk form interventions, such as louvres along Level 2, relocation of patterned façade to Level 1, externalised stair elements with brick materiality, reducing the bulk of the warehouse.</p>	Appendix D Appendix E Appendix H
6. No Clause 4.6 variation has been provided in regards to the access denial provisions in Clause 7.9 of the Blacktown Local Environment Plan 2015.	<i>Blacktown Local Environmental Plan 2015</i> does not apply to the site. The primary environmental planning instrument is <i>State Environmental Planning Policy (Industry and Employment) 2021 (SEPP Industry and Employment)</i> . Further, access provisions are not a development standard and a clause 4.6 variation is not appropriate or required to justify the proposed access arrangements.	N/A
7. The introduction of planting within car parking areas where possible is highly encouraged as the proposal is adding significant hardstand surfaces to the site and is expected to result in an	The amended Architectural Plans and Landscape Plans now include two landscaping diamonds where car parking is back-to-back in the southeastern portion of the Warehouse 3/4 car park.	Appendix D Appendix F

<p>overall increase in urban heat across the site as identified in the Social Impact Assessment Report. The installation of diamond planters every 4 to 6 parking spaces will greatly assist in providing urban canopy cover and mitigating urban heat impacts.</p>	<p>Otherwise, large canopy trees are provided at maximum 9 parking bay intervals with an increased tree canopy coverage of 18.6% to reduce the impact of urban heat across the car parking areas of the site.</p>	
<p>8. Furthermore, the use of Monument coloured sheeting on the facades should be reconsidered in light of urban heat mitigation.</p>	<p>The façades of all warehouse buildings across the precinct have been updated to remove the 'Monument' Colorbond material from the façade sheeting and replace with 'Woodland Grey', minimising urban heat island produced by the proposed.</p>	<p>Appendix D</p>
<p>9. As per Section 10.3 of the Huntingwood DCP, blank walls are to be avoided. The western elevation of Warehouse 4 is located in an area which has high visual sensitivity. The view lines from the Great Western Highway have not been provided within the Visual Impact Assessment to establish the visual impact of the proposal however this façade must be amended to establish some form of visual relief.</p>	<p>The facade for the Warehouse 3/4 western elevation has been updated to show a checkerboard pattern facing the Great Western Highway, embellishing this previously blank façade to provide visual relieve to this elevation.</p> <p>Viewpoint 3F within the amended VIA highlights the impact of this change in the reference photo, continuing the articulation of the north façade to address the view lines from the Great Western Highway.</p>	<p>Appendix D Appendix H</p>
<p>10. Confirm how staff at Warehouse 5 will access the parking areas. The current set up indicates all parking to be on the lower ground level with 2 levels of warehouse tenancies above. The only access however is via the shared lift/fire stair cores, given the anticipated number of staffs. It would be advisable to provide separate access for each proposed warehouse unit to ensure operational efficiency.</p>	<p>To ensure security and safety, warehouse staff must use the shared high-frequency lifts located at the parking level to access all warehouse areas. The inclusion of separate access for each proposed warehouse would be unnecessarily complicated and inefficient.</p> <p>All personnel arriving at the warehouse are required to check-in at the offices before proceeding to the warehouse floor. Access directly into the warehouse or across the hardstand areas is strictly prohibited due to the high volumes of heavy vehicles and machinery.</p> <p>A Ground Floor Pedestrian Access Plan has been provided in the updated Architectural Plans to illustrate the designated travel routes for each warehouse tenancy within Warehouse 5.</p>	<p>Appendix D</p>
<p>11. The pedestrian granite pathway should ideally be connected to the Augusta Street connection to allow for local residents to be able to utilise the boardwalks and viewing areas proposed within the creek way.</p>	<p>For safety and security reasons this item cannot be implemented by LOGOS. Consent is being sought for multiple 24-hour warehouse and distribution centres. The intermingling of public pedestrian traffic and trucks raises significant safety concerns.</p>	<p>N/A</p>

	LOGOS would be open to provide a connection to the conservation areas via Augusta Street provided the conservation areas are dedicated to Council following completion of the works.	
City Architect Matters		
12. Opportunities to increase canopy cover where possible are to be explored.	The western swale design has been amended to relocate the Onsite Stormwater Detention (OSD) basin within the southern Warehouse 3/4 hardstand area (refer to CO13904.03-SSDA400 of the amended Civil Drawings). As a result, 72 additional tree plantings will be retained in conjunction with additional landscaping works within the western swale effectively increasing tree canopy coverage from 16.23% to 18.6%. Refer to the amended Architectural Plans, Landscape Plans and Civil Drawings.	Appendix D Appendix F Appendix G
Environmental Health Matters		
13. The Detailed Site Assessment recommends the submission of a Remedial Action Plan (RAP), should on-site containment be selected as a remediation strategy, Council requires all reports, plans and specifications be provided to Council for review and record keeping.	A Remediation Action Plan (RAP) was provided as part of the formal SSDA package.	Appendix M
14. The remediation action plan states that on-site containment would be the preferred option for soils impacted by asbestos, PAH and heavy metals. On-site containment is expected to be inside lots 2 and 3, however the RAP does not specify the exact proposed location. Clarification required.	The RAP and Long-Term Environmental Management Plan (LTEMP) have been amended to reflect the approximate area for the onsite containment area within Lots 2 and 3.	Appendix M Appendix N
15. Provide the final Long-Term Environmental Management Plan for Councils review.	A preliminary LTEMP has been provided with the formal SSDA lodgement. A final version of the LTEMP would provide ongoing management actions required at the conclusion of remediation works. As the remediation works are to be undertaken as a post consent matter, the LTEMP cannot be provided in its final form at this time. The preliminary LTEMP provide appropriate management procedures for the containment of all impacts identified at the site as part of previous investigations.	Appendix N

	It is noted that during the future occupation of the site, the LTEMP will be reviewed and amended as part of an ongoing process to document any maintenance works that may occur on the site.	
16. The Noise and Vibration Impact Assessment has been reviewed and it is noted that that noise monitor (L01) was not placed near the closest “moderately affected” sensitive receiver (R04). There was no reason provided for why this monitor was set ~35m further back from R04. Clarification required.	The rationale for the noise monitor L01 location was the private access required to install the monitor to ensure security and reduce the possibility of the monitor being vandalized or stolen. R04 was unoccupied at the time of monitoring and installing a monitor at that location would come with significant risk. From an acoustic standpoint, the current location of the L01 monitor would be considered more conservative when establishing the background noise levels, as it is further setback from the Great Western Highway. Monitoring at R04 would likely result in comparable, if not slightly higher ambient noise levels than those measured to date. Given the criteria for the receivers in NCA1 are set by the amenity noise level for the evening and night-time periods, the criteria is independent of the measured levels.	Appendix I
17. Therefore, the noise impacts on the nearby residential areas from a 24 hour operation has not been addressed to Council’s satisfaction.	Noted. Please refer to the justification above regarding the location of the L01 noise monitor.	Appendix I
Engineering Matters 18. The limit of works on Flushcombe Road is to extend up to the Great Western Highway Intersection.	Upgrades to the full extent of Flushcombe Road have been detailed on the Civil Drawings, please refer to the following plan references: <ul style="list-style-type: none"> ▪ CO13904.03-SSDA711 – Rev B ▪ CO13904.03-SSDA712 – Rev D ▪ CO13904.03-SSDA721 – Rev C For works within the Flushcombe Road / Great Western Highway intersection, please refer to Intersection Diagrams prepared by MU Group (P22-05-0001)	Appendix G Appendix R
Traffic Matters 19. The Plan showing the driveway access provided from Flushcombe Road to the car park of warehouse 1 is not in accordance with the upgraded signalised intersection of Flushcombe Road and Great Western Highway (GWH). A plan showing the details/design of this intersection upgrade, the proposed slip lane, the driveway location, pavement arrows and	Intersection upgrade plans have been prepared by MU Group for the Flushcombe Road / Great Western Highway has been provided with this RtS Response. Ongoing consultation with TfNSW regarding the intersection design will be undertaken during the post consent period.	Appendix R

associated signs be provided for our review should this not be approved by TfNSW yet.	Upgrades to the full extent of Flushcombe Road have been detailed on the Civil Drawings, please refer to the following plan references:	Appendix G
20. The proposal currently entails only the upgrade of Flushcombe Road between the Great Western Highway and Augusta Street however the proposed development sees private vehicles for Warehouse 2 utilise the full extent of Flushcombe Road to gain access to the Warehouse 2 carpark. On this basis and due to the expected increase in vehicular conditions on an already deteriorated section of road, it is recommended that the road upgrade works be extended to the full length of Flushcombe Road.	<ul style="list-style-type: none"> ▪ CO13904.03-SSDA711 – Rev B ▪ CO13904.03-SSDA712 – Rev D ▪ CO13904.03-SSDA721 – Rev C 	Appendix G
21. Formal approval is required from TfNSW for the proposed driveway servicing Warehouse 5A,5B,5C,5D,5E,5F,5G,5H.	Noted, the SSDA has been referred to TfNSW for comment. Responses to matters raised by TfNSW are included in Table 7 .	N/A
22. Provide a detailed Construction Traffic Management Plan.	<p>A Construction Traffic Management will be provided in accordance with a condition of consent. This is typical where there are no significant concerns regarding the capacity of the site to accommodate construction traffic movements or loading/unloading activities.</p> <p>There will be sufficient room to accommodate large vehicle movements at no detriment to the surrounding landowners. The erosion and sediment control measures detailed in the Civil Engineering Plans show the locations of the stockpiles which will be confirmed during the detailed design phase.</p>	N/A
23. Provide details regarding the Prospect Highway future road widening on lots 53,54,55 DP 1144623 and how this impacts the proposed development.	<p>Road widening of the Prospect Highway nominated for Lots 53, 54 and 55 in DP1133623 will not affect the proposal. No building works will be undertaken within these lots, and an 8m landscape setback provided to these allotments as required by Heritage NSW.</p> <p>Appendix C within the TAIA details the Prospect Highway upgrades, including works within the future road widening allotments. These works will not impact the proposed development. It is not anticipated that further road works will be required in the allotments at this time.</p>	Appendix J
Biodiversity Matters	The items raised by Council regarding HDCP 2011 are addressed as follows:	Appendix D
24. The proposal is inconsistent with controls within the Huntingwood Precinct DCP 2011 (as amended 2020).		Appendix G Appendix K

a. In particular, reference should be drawn to the objectives and controls around setbacks, biodiversity and riparian corridors and the conservation areas identified in Figure 4 of the Huntingwood Precinct DCP.

b. In particular, sediment basins 2 & 3, a stormwater management basin, proposed access tracks for endeavour energy at the eastern end and car parking at the western end, currently sit within the 20 m landscape setback areas from the Great Western Highway and the M4 motorway. These should be relocated outside of the landscape setback areas.

c. The landscape setback from Flushcombe Rd is currently less than the 7.5 m stipulated in the DCP.

d. Per the DCP, when measured from the top of the bank on either side of the creek, development consent shall not be granted, except for development associated with protection, enhancement and management of riparian corridors, on land within the Precinct that is within 20m + 10m (buffer) of Category 2 Corridors. Figure 4 of the Huntingwood DCP shows both of the riparian corridors on site within the proposal Lots are classified as Category 2. The proposal therefore needs to remove all hardstand areas, storage, acoustic walls and the like from the riparian corridor areas.

a. The Statutory Compliance Table appended to the SSDA addressed all controls under Section 6.1 Biodiversity of HDCP 2011. The objectives of the section are achieved by the proposal as follows:

- The BDAR prepared for the SSDA identified Plant Community Type (PCT) 3319 on the site which is associated with the Cumberland Plain Woodland. Of the PCT 3319 areas, 2.03ha were categorised as degraded and 0.34ha were categorised as less degraded. The proposal will retain 1.39ha of degraded PCT 3319 and 0.27ha of less degraded PCT 3319. The landscape treatment promoted by the proposal will improve the biodiversity value of the site, removing weeds and planting natives associated with PCT 3319. It is noted that no threatened species were surveyed on site.
- Connectivity with the surrounding vegetation is currently fragmented and further limited by the Great Western Highway and M4 to the north and south. The proposal will maintain and enhance existing vegetation through the conservation, enhancement and reestablishment of native vegetation within the nominated conservation areas.
- Adequate buffer areas have been provided to Blacktown Creek and the western swale to enable conservation and reinvigoration of the corridors across the site.

b. The proposal addresses these items within the Great Western Highway and M4 Motorway 20m landscape setback as follows:

- Sediment Basin 2 is within the Warehouse 2 building area.
- Sediment Basin 3 is partly within the northern 20m setback, however, this does not contravene the DCP setbacks which apply to buildings. Upon completion of construction and stabilising of any disturbed surfaces, the sediment basins will be made redundant and vegetated, complementing the landscaped areas.
- The stormwater management basin, including detention and bio-retention systems, will be vegetated and integrated into the over landscape design with small tree plantings and hydromulch. The proposed basin will achieve the amenity outcomes of a landscape setback while allowing the required

stormwater management systems to be designed as WSUD elements in-lieu of hardscape or underground tanks.

- The stormwater management basin along the western swale has been relocated below the Warehouse 3/4 southern hardstand and out of the 20m setback.
- The Endeavour Energy access tracks at southeastern corner have been redesigned to be a landscaped path rather than a concrete pathway.
- The car parking area within the 20m setback have been redesigned from hardstand to turf cell permeable paving, complementing the landscaped areas.

c. As stipulated in Section 10.2 (a) of HDCP 2011, development on corner allotments is to have a 5m secondary setback to the 7.5m primary setback. Both roads are classified as 'local roads' by TfNSW. Augusta Street is the primary frontage for Warehouse 1 and Warehouse 2 as the site will be addressed from this frontage and the heavy truck entry for both warehouses will be off Augusta Street. Excluding vehicle crossover areas, a 7.5m landscape setback has been provided along Augusta Street for both warehouses and a 5m landscape setback has been provided to Flushcombe Road.

d. NRAR confirmed the western swale is not categorised or mapped as a watercourse within the meaning of the *Water Management Act 2000* - refer Appendix 2 of the original BDAR. This has been confirmed in the amended BDAR. Accordingly, the Category 2 setback provisions do not apply as the land is not categorised as a riparian corridor.

Despite the above, the amended Architectural Plans and Landscape Plans seek to implement a 10m setback with 5m buffer areas on both sides of the swale for provision of a conservation area. The relocation of the OSD basin has enabled the retention of 72 additional tree plantings in tandem with the additional native tree planting and swale realignment all enhance connectivity of vegetation within these areas and reintroduce biodiversity value into this area.

25. In terms of mitigation measures, the EIS, BDAR and Mitigation Measures document provided propose that a Conservation and Vegetation and Construction Management Plan be developed as Conditions of consent. Council does not support this, maintaining that these designs and plans need to form part of the development application.

e. The reason for this is that the creek lines are important conservation areas within the Huntingwood Precinct DCP and the ability to construct and manage them for conservation with this proposal will form an important part of the assessment to support state government refusal or consent to it.

f. The DCP also stipulates that Flora and Fauna Management Plans are to accompany all DAs within the Huntingwood precinct inclusive of:

- i. mechanism for enduring protection and maintenance of conservation areas and riparian corridors under private ownership;
- ii. management tasks to maintain or improve biodiversity values (with reference to Recovering Bushland on the Cumberland Plain - Best Practice Guidelines for the Management and Restoration of Bushland, Department of Environment and Climate Change 2005);
- iii. public access;
- iv. noxious and environmental weed control;
- v. revegetation plans and protocols; and
- vi. monitoring and reporting programs.

26. The BDAR recommends that in preference to purchase of Biodiversity Credits, any residual impacts should be offset by conservation works on the adjoining and nearby land. This is not supported by Council. It does not apply to SSD and Council has a program of improvement works already in place for the nearby

A detailed VMP has been prepared with the amended BDAR. The VMP provides objectives and mechanisms for:

- Protection of the VMP areas.
- Increase community awareness of the benefits of canopy vegetation to minimise heat island effects.
- Feral pest control and relocation of native fauna species.
- Remove existing dumpings and weed control.
- Re-establish the landform and associated hydrology.
- Habitat creation for threatened species.
- Enhancing water quality in bioretention and reconstructing wetlands using local native species.
- Enhancement of the local native vegetation utilising the conservation assets.
- Increasing connectivity.
- Monitoring and maintenance.

The mitigation measures from the BDAR include local conservation improvement nearby to benefit the local community be investigated in consultation with Council. The applicant will enter into a works-in-kind agreement with Council to deliver:

Appendix K
Appendix T

Appendix K

<p>areas identified. All offset credits as calculated in the BDAR should be retired as Conditions of Consent.</p>	<ul style="list-style-type: none"> ▪ Planting of local native trees within the RE1 Public Recreation zoned land north of the site, complimenting bush regeneration works being undertaken along Blacktown Creek. ▪ Enhancement of Important Habitat Area for the Swift Parrot in Timbertop Reserve. ▪ Planting of local native trees in the residential area north of the site to reduce urban heat island effect. 	
<p>27. The following supporting documents shall be provided in electric formal for assessment:</p> <ul style="list-style-type: none"> i. The OSD spreadsheet shall be provided. ii. MUSIC model shall be provided to confirm the reduction target and the non-potable reuse target are achieved. iii. DRAINS model to confirm the drainage design on both internal and external of the site iv. Tuflow model to show the waterway in both pre and post development 	<p>The amended Civil Engineering Report and Drawings respond to the noted items as follows:</p> <ul style="list-style-type: none"> ▪ Electronic format OSD spreadsheets have been submitted with the updated package and report. ▪ The MUSIC Model has been submitted with the updated package and report. ▪ The DRAINS model has been submitted with the updated package and report. ▪ The Tuflow model (Software – XPStorm) has been submitted with the updated package and report. 	Appendix G
<p>28. The submitted Civil Work package, Costin Roe Consulting, Job NumberCO13904.03, Revision 3 and dated 08/09/23 shall be amended:</p> <ul style="list-style-type: none"> i. the details of the proposed OSD and storm filter tank shall be provided including details of the control pit, orifice level weir level and cross-section of the tanks etc in both warehouse 1 & 2. The required details can be found in Council’s Engineering Guideline for Development and WSUD Standard drawing A(BS)175M. ii. the details of the proposed bioretention & detention basin shall be provided including details of the control pit, orifice level weir level and cross-section of the basins etc in both warehouse 3 & 4. The required details can be found in Council’s Engineering 	<p>The Civil Engineering Report and Plans have been amended to respond to the matters raised as follows:</p> <ul style="list-style-type: none"> ▪ Drawings CO13904.03-SSDA454, CO13904.03-SSDA460-465 and CO13904.03-SSDA550-553 have been updated or included to provide details of the proposed OSD and storm filter tank. ▪ All access tracks will be designed to have a gradient of no more than 10%. Design of these tracks to form part of the detailed design stage. ▪ Solar access to both OSD basins will meet the minimum solar access requirements. ▪ Wetlands will be design in accordance with Blacktown Council’s typical WSUD details and guidelines during the detail design stage. Refer to CO13904.03-SSDA552 for sections through the wetlands. Typical frog pond details are provided at CO13904.03-SSDA458. 	Appendix G

Guideline for Development and WSUD Standard drawing A(BS)175M. Secondly, the longitude section of the access track shall be provided to prove the gradient is not more the 10%. Furthermore, the solar access of both basins are uncertain. The consultant shall confirm the basin meet the minimum solar access.

- The electronic DRAINS model attached to the Civil Engineering Report and Drawings contains all pipeline details.
- Drawings CO13904.03-SSDA550-553 provide sections through Blacktown Creek.
- The design of the proposed culvert under Augusta Street is provided at CO13904.03-SSDA756. The design will be progressed and developed during the detail design stage.

iii. The details of the permanent ponds and wetland are insufficient for assessment. More details must be provided.

iv. All pipeline details were not included in the submitted plan.

v. The details of rehabilitated creek must be provided including cross- sections, longitudinal section with 1% AEP and PMF water level.

vi. The detail of the culvert on Augusta Street must be provided

Table 7 Response to Government Agency and Public Submissions

Summary of Issue Raised	Response	Supporting Documentation
EHG Letter – dated 6 November 2023		
<p>Biodiversity Figure 7b-2 of the BDAR shows the development footprint. It is assumed all vegetation mapped outside the footprint has been included in the calculation of the vegetation to be ‘retained’. However, the proposed Bioretention basin occurs in an area mapped as retained. It is unlikely that the structure and floristics of PCT 3319 could be maintained in the long term if this is to be a Bioretention basin. If vegetation in this area is to be impacted, either directly or indirectly, it should be included in the calculation of areas to be cleared.</p>	<p>Figure 7b has been updated to reflect the development footprint, including proposed civil works. The calculation of areas has been updated to reflect the amended ‘retained’ vegetation, 1.66ha</p>	<p>Appendix K</p>
<p>Section C12.0 of the BDAR recommends that in preference to credit purchase, that conservation works on adjoining lands should occur. This is not in</p>	<p>The mitigation measures from the BDAR include local conservation improvement nearby to benefit the local community</p>	<p>Appendix K</p>

<p>accordance with the Biodiversity Offset Scheme (BOS), which requires conservation works on lands to be secured through a Biodiversity Stewardship Agreement. Also, the BDAR refers to Section 7.13(4) of the Biodiversity Conservation Act 2016 to justify this recommendation. However, as acknowledged by the BDAR, Section 7.13(4) relates to development 'other than' State Significant Developments, so it is unclear why this was included.</p>	<p>be investigated in consultation with Council. The applicant will enter into a works-in-kind agreement with Council to deliver:</p> <ul style="list-style-type: none"> ▪ Planting of local native trees within the RE1 Public Recreation zoned land north of the site, complimenting bush regeneration works being undertaken along Blacktown Creek. ▪ Enhancement of Important Habitat Area for the Swift Parrot in Timbertop Reserve. ▪ Planting of local native trees in the residential area north of the site to reduce urban heat island effect. 	
<p>Section A3.2.2 discusses the triggers for the BOS being the Biodiversity Values Map and the area threshold, however these aren't relevant to this project as it is an SSD. A BDAR must be prepared for all SSDs, unless a waiver is granted.</p>	<p>Section A3.2.2 of the amended BDAR has been clarified, stating a BDAR is required for SSDA under Part 7 of the <i>Biodiversity Conservation Act 2016</i>.</p>	<p>Appendix K</p>
<p>The BDAR states that <i>Grevillea robusta</i> should not be considered a native tree species for the purposes of the BDAR. However, as this species is native to NSW it must be considered as native vegetation. Despite this, it can be considered in the BDAR as a planted native species.</p>	<p><i>Grevillea robusta</i> is a 'widely cultivated native species' and its existence on the site is outside its accepted natural range as confirmed in the response from the BAM Support team in Appendix 2 of the BDAR. <i>Grevillea robusta</i> is considered an environmental weed within Hunts Creek (approximately 10 km northeast of the site). The BDAR concludes <i>Grevillea robusta</i> should be considered an environmental weed as it becomes invasive outside its natural range.</p>	<p>Appendix K</p>
<p>The BDAR is missing some mapped landscape features, as required by BAM 3.1.3. These include:</p> <ul style="list-style-type: none"> ▪ Figure 1a-1 shows mapped watercourses, but the BAM requires mapping of stream order. ▪ There is no mapping of habitat connectivity. ▪ The maps of vegetation zones should include planted vegetation, as all areas of native vegetation must be mapped, including areas of planted native vegetation. 	<p>The figures noted have been updated accordingly:</p> <ul style="list-style-type: none"> ▪ Figure 1a-1 shows watercourses from LPI Clip 'n' Ship. Appendix 2 contains an email from NRAR confirm stream order. ▪ Figure 1a-3 shows habitat connectivity. Additional information on connectivity is provided at Section B3.1.1. ▪ Figure 7a maps all areas of vegetation. Section B4.2.2 provides additional information on vegetation zones. 	<p>Appendix K</p>
<p>From page 61 onwards the site address in the header is listed as '8 Augusta Place, Mollymook' instead of 'Augusta Street, Huntingwood'.</p>	<p>The amended BDAR has been updated to reflect 'Augusta Street, Huntingwood'.</p>	<p>Appendix K</p>

<p>According to the areas mapped in Figure 1a-3, the percent native vegetation cover has not included areas of planted veg (see BAM definition of native vegetation cover).</p>	<p>Section B4.2.2 of the amended BDAR further describes the vegetation zones.</p>	<p>Appendix K</p>
<p>Section B4.3 of the BDAR states that from using the Plot to PCT tool, three plots (2, 4 and 7) met the floristic match threshold for PCT 3319, but that one of these plots (plot 2) also met the threshold for PCT 3320, so all vegetation on site was mapped as PCT 3319. It is noted that from the data, it appears that the vegetation in Plot 2 more closely aligns with PCT 3320 than PCT 3319, as the figure for the distance to centroid is lower. In addition, Plot 2 is located at the edge of the site (i.e., it is not physically located between Plots 4 and 7). Therefore, it is not clear why this patch of vegetation in the east of the site was not mapped as PCT 3320.</p>	<p>Plots 2, 4, and 7 with matches (<0.695 centroid values) in the Plot to PCT tool are on upper sections of the site on rolling hills. Given the degraded state of the vegetation and similarity of the two Plant Communities Types (PCTs), the best match is more likely to be PCT 3319 Cumberland Shale Hills Woodland than PCT 3320 Cumberland Shale Plains Woodland due to the hilly topography onsite.</p>	<p>Appendix K</p>
<p>According to Table 1, some native species were identified in most of the quadrats mapped as exotic vegetation zone. The BDAR should include some description of this zone. The BDAR states these zones were 'predominantly exotic' but it is not clear what percentage of exotics would need to be present to class these areas as exotic. The BDAR should also justify why they were classed as exotic instead of derived native grassland. Section B4.2.2 describes the percent of exotics but these data are percent of total numbers of species, not percent cover.</p>	<p>Section B4.2.2 has been updated to include percentage covers of exotic, native and perennial understorey species.</p>	<p>Appendix K</p>
<p>The BDAR should include a map of the 'patch' that was used to assess the patch size.</p>	<p>The extent of native vegetation 'patch' is shown on Figure 1a-3. Details of connectivity are in Section B3.1.1 of the BDAR.</p>	<p>Appendix K</p>
<p>The BDAR refers to Appendix 7 as an 'expert report' but it is not an expert report as the expert has not been authorised as such by DPE. Therefore, the entries in the BAM-C which state that the species was excluded because of the expert report, are incorrect.</p>	<p>Appendix 7a of the amended BDAR confirms Grant Webster has been approved as a BAM species expert.</p>	<p>Appendix K</p>
<p>Appendix 7 states that a habitat suitability assessment was undertaken for Southern Myotis, which is not in accordance with the "Species credit' threatened bats and their habitats" survey guide, which requires use of harp traps and mist nets.</p>	<p>Section B2.3.3 and Appendix 9 of the amended BDAR detail additional microbat searches, including within culverts. No evidence of microbats was found. The only fauna detected were domestic cats, European red foxes and their scat in the culverts and black rats within the exotic weeds.</p>	<p>Appendix K</p>

<p>The BDAR states that the Southern Myotis is moderately likely to use roosting habitat on site. Therefore, in accordance with BAM section 5.2.4.3, a species polygon should be prepared.</p>	<p>As stated above, additional surveys were undertaken for the Southern Myotis, along with other microbat species. No evidence of microbats was found.</p>	<p>Appendix K</p>
<p>There is little information on the targeted surveys that were undertaken. Section B2.3.2 states that the site was 'carefully walked over' but there is no detail on location or effort, or whether the survey was undertaken in accordance with the "Surveying threatened plants and their habitats" guidance.</p>	<p>Details of the targeted survey efforts have been provided at Section B2.3.3 of the amended BDAR. The surveys were undertaken in accordance with the 'Surveying threatened plants and their habitats' guidance.</p>	<p>Appendix K</p>
<p>In accordance with BioNet, the survey requirements for Pimelea spicata are that surveys should occur four weeks after at least a 30mm rainfall event. There is no reference to this requirement or information on whether this was done.</p>	<p>Section B2.3.3 of the amended BDAR confirms onsite surveys for Pimelea spicata were undertaken during favourable conditions with at least 30 mm rainfall in the four weeks prior to survey.</p>	<p>Appendix K</p>
<p>There is no discussion of limitations of the survey.</p>	<p>Section 2.3.3 of the BDAR notes the main limitation of the targeted surveys was dense weed growth including 0.5m tall <i>Eragrostis curvula</i> and the monostands of <i>Rubus anglocandicans</i>. This growth is a result of the historic intense agriculture with major soil disturbance over 200 years.</p>	<p>Appendix K</p>
<p>Appendix 6 concludes that breeding habitat for Eastern Bent-wing Bat and Little Bent-wing Bat is unlikely to be on site as the 2020 surveys did not record an adequate number of individuals, but it is not clear from the information provided that the surveys in 2020 were undertaken in accordance with the "Species credit' threatened bats and their habitats" survey guide.</p>	<p>Appendix 12 of the amended BDAR responses to additional surveys undertaken for both nominated species:</p> <ul style="list-style-type: none"> ▪ Large Bent-winged Bat (Breeding) [formerly Eastern Bent-wing Bat] 'Unlikely' as there were no roosting habitat onsite, however, there are culverts. Updated under the amended BDAR to 'Possible'. ▪ Little Bent-winged Bat (Breeding) added in the amended BDAR as 'Unlikely'. There are no maternity colonies onsite. Note only five nursery sites /maternity colonies are known in Australia. <p>The 2020 surveys from Ecoplanning (2020) conclude: <i>Targeted survey for the threatened microbat species included the use of two ultrasonic detectors over 9 nights (8-17 April 2020). The total survey effort of 18 nights meets the survey requirements specified in "Species credit' threatened bats and their habitats" (OEH 2018b). The detectors were set to record before sunset and</i></p>	<p>Appendix K</p>

	<p><i>stop after dawn and in a position that maximised the likelihood of recording bats in accordance with (OEH 2018b).</i></p> <p>On 27 February 2024, cracks and crevices in the culverts were searched for microbats. No evidence of bat activity detected in culvert nor onsite (Durrant 2024 in Appendix 9 of the amended BDAR in Version 3).</p>	
There is no information on the sensitivity class of species.	Appendix 6 has been updated to include Sensitivity to Gain Class for ecosystem credit species.	Appendix K
The discussion of prescribed impacts should have included consideration of the use of planted and non-native vegetation as foraging and roosting habitat.	Section 2.3.3 of the BDAR notes the main limitation of the targeted surveys was the dense weed growth including 0.5m tall <i>Eragrostis curvula</i> and the monostands of <i>Rubus anglocandicans</i> . This growth is a result of the historic intense agriculture with major soil disturbance over 200 years.	Appendix K
The consideration of serious and irreversible impacts has not addressed the required criteria in section 9.1.1 of the BAM.	<p>Section 9.1.1 of the BAM refers to additional impact assessment provisions for Threatened Ecological Community (TECs) at risk of an Serious and Irreversible Impacts (SAII).</p> <p>Section 9 and Appendix 13 of the amended BDAR applies the Guidance to assist a decision-maker to determine a serious and irreversible impact. It was concluded that the proposal, with its Conservation Areas, is unlikely to result in a Serious and Irreversible impact on Cumberland Plain Woodland TEC.</p>	Appendix K
The BDAR includes information on the credit requirement, but according to section C10.1.1, the calculated number of credits for the revised proposal is an estimate only, which has been calculated as a proportion of the number of credits required for the submitted proposal. This does not meet BAM requirements. The data for the revised proposal must be entered into the BAM-C, and the BDAR should state the number of credits that the BAM-C calculates.	<p>The Biodiversity Assessment Method (BAM) calculator has been run for the proposed development. The number of credits required are:</p> <ul style="list-style-type: none"> ▪ 11 Ecosystem credits for 0.64ha of PCT3319 – degraded. ▪ 3 Ecosystem credits for 0.07 of PCT3319 – less degraded. 	Appendix K
The BDAR has been reviewed without access to the case in the BAM-C. To allow EHG to view the case, the assessor must add EHG as a case party (consent authority member) in the parent case and then 'submit to consent authority'. In	'Greater Sydney – Compliance and Regulation' have been added to the case in the BAM-C.	Appendix K

this matter, the relevant EHG team is 'Greater Sydney – Compliance and Regulation'.		
The BDAR has also been reviewed without access to the spatial data. The spatial data should be saved in the parent case in the BAM-C.	The BAM checklist in Table 24 and 25 of the BDAR has been saved in the parent case of the BAM-C.	Appendix K
Flooding Most of the site in the post-development scenario is not impacted by flooding, except Building 1 which is partially impacted by shallow depth in the PMF event.	Noted.	N/A
Access to warehouse 5 is available through Prospect Highway for all events.	Noted.	N/A
Access to warehouses 1 to 4 is available through the Great Western Highway, Flushcombe Road and Augusta Street for all events except in the PMF. In this extreme event, high hazard condition at the intersection of the Great Western Highway and Flushcombe Road would cut the access for a very short duration (less than an hour).	Noted.	N/A
Endeavour Energy letter, dated 11 October 2023		
Please find attached copies of Endeavour Energy's submission made on:	The following responses incorporate all matters raised in letter dated 29 September 2020 for the Endeavour Energy Submission for the data centre under SSD-10469 and letter dated 15 July 2020 for the Endeavour Energy concurrence and referral request. This is inclusive of the Endeavour Energy submission on the SEARs request for SSD-10469 in correspondence dated 17 June 2020.	Appendix P
<ul style="list-style-type: none"> 29 September 2020 to the Department regarding the notice of exhibition of the Environmental Impact Statement (EIS) for State Significant Development SSD-10469 Augusta Street Data Centre for construction and operation of a Data Centre including data storage building with 16 data halls, two electrical substations, rooftop plant and equipment, diesel generators, diesel storage, ancillary offices, carparking, hardstand and landscaping. 15 July 2020 from to Blacktown City Council regarding NSW Government concurrence and referral request CNR-9654 for Blacktown City Council Development Application DA-20-00804 at AUGUSTA STREET BLACKTOWN 2148 for 'Consolidation and resubdivision into 4 lot Torrens title, bulk earthworks and associated infrastructure'. 		
Please also find attached for the applicant's reference copies of Endeavour Energy's:		
<ul style="list-style-type: none"> Land Interest Guidelines for Network Connection Works, Version 5, December 2022. 		

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- Standard Conditions for Development Applications and Planning Proposals, Version 9, August 2023.
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SSD-10469 Letter dated 29 September 2020

Subject to the foregoing and the following recommendations and comments Endeavour Energy has no objection to the Development Application.

- Network Capacity / Connection

Endeavour Energy has noted that the EIS does not appear to address in detail the suitability of the site for the development in regard to whether electricity services are available and adequate for the development or the impact on the existing easements and electricity infrastructure on an in the vicinity of the site.

The application for connection of load to an urban industrial subdivision does not necessarily provide consideration to the electricity load of the subsequent actual use of the lots within the subdivision. However, in this instance Endeavour Energy has noted the following in the Statement of Environmental Effects for Blacktown City Council Development Application DA-20-00804 for 'Consolidation and resubdivision into 4 lot Torrens title, bulk earthworks and associated infrastructure'.

- Infrastructure Requirements

As part of the scope of works, the existing 11kV aboveground High Voltage (HV) cables traversing the Site will need relocated to suit the realignment proposed of Augusta Street. The existing HV Cables and surrounding easements will be realigned to suit the proposed development works and to ensure no disruptions to site south of M4 motorway. Accordingly, preliminary analysis for EE has indicated the site will be serviced by the Ardell Park Zone submission 1.7km northeast of the site. It is considered likely, that a minimum of one feeder (11 kV) cable will be required to be brought into the Site.

Furthermore, the existing HV transmission lines located within the southern portion of the Site running parallel to the M4 Motorway are proposed to remain and be protected during the construction phase. A Low Voltage will also be provided within Augusta Street, serving in the proposed street lights required as part of the road in structure works.

Development of the site would result in a network capacity demand of 4.3MVA. To cater for this level of demand, high voltage feeder will need to be laid from the Arndell Part Zone Substation to the site, of approx. 2.3km.

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The overall masterplan will result in the relocation and removal of existing overhead reticulation systems. New electrical infrastructure to facilitate the proposed development will be located underground.

The applicant has engaged Edgewater Connections, a Level 3 Accredited Service Provider (**ASP**), to lodge applications with Endeavour Energy to determine any constraints within the electrical supply/distribution system for the area. A new 11kv electrical feeder will be provided from the Arndell Park Zone Substation to service the site.

All required infrastructure to service the development will be funded by the applicant.

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Accordingly, the applicant and their Accredited Service Provider (ASP) should continue to contact Endeavour Energy's Network Connections Branch who are responsible for are managing the conditions of supply to the proposed development and can be contacted via Head Office enquiries on telephone: 133 718 or (02) 9853 6666 from 9am - 4:30pm). Network Asset Design.

▪ Hazardous and/or Offensive Development

Whilst the SEPP 33 - Preliminary Risk Screening concludes that 'The SEPP33 screenings for storage of dangerous goods indicate that the development may not be classified as a hazardous or offensive industry', given that diesel fuel is to be stored on site which is classed as a C1 Combustible Liquid (provided no flammable liquids are stored with the diesel), increasing the separation distances as far as reasonably possible between the diesel storage and any electricity infrastructure on the site is still recommended by Endeavour Energy.

The proposal does not propose the storage of diesel, nor any facilities that require assessment under State Environmental Planning Policy (Resilience and Hazards) 2021 (**Resilience & Hazards SEPP**).

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DA-20-00804 Letter dated 15 July 2020

▪ Network Capacity / Connection

Endeavour Energy has noted the following in the Statement of Environmental Effects addressing the suitability of the site for the development in regard to whether electricity services are available and adequate for the development.

5.10 Infrastructure Requirements

The Civil and Infrastructure Report prepared by AT&L (2020) considers the relevant infrastructure requirements to faciality future built form on the Subject Site.

5.10.5 Electricity

As part of the scope of works, th existing 11kV aboveground High Voltage (HV) cables traversing the Site will need relocated to suit the realignment proposed of Augusta Street. The existing HV Cables and surrounding easements will be realigned to suit the proposed development works and to ensure no disruptions to site south of M4 motorway. Accordingly, preliminary analysis for EE has indicated the site will be serviced by the Ardell Park Zone submission 1.7km northeast of the site. It is considered likely, that a minimum of one feeder (11 kV) cable will be required to be brought into the Site.

The following consultation and infrastructure delivery outcomes are proposed to deliver the warehouse and distribution centre:

- Development of the site would provide a demand of approximately 4.3MVA (see formal lodgement Service Infrastructure Report Assessment - Appendix B).
- To cater for this level of demand high voltage feeder will need to be laid from the Arndell Park Zone Substation (corner of Walters Road and Holbeche Road – distance approximately 2.3km) to the site.
- The applicant has engaged Edgewater Connections, a Level 3 ASP, to lodge applications with Endeavour Energy to determine any constraints within the electrical supply/distribution system for the area.
- Edgewater Connections have received a response from Endeavour Energy for the Technical Review Request that was lodged (see formal lodgement Service Infrastructure Report Assessment - Appendix B).

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Furthermore, the existing HV transmission lines located within the southern portion of the Site running parallel to the M4 Motorway are proposed to remain and be protected during the construction phase. A Low Voltage will also be provided within Augusta Street, serving in the proposed street lights required as part of the road in structure works.

Accordingly, the applicant and their Accredited Service Provider (ASP) should continue to contact Endeavour Energy's Network Connections Branch who are responsible for are managing the conditions of supply to the proposed development and can be contacted via Head Office enquiries on telephone: 133 718 or (02) 9853 6666 from 9am - 4:30pm). Network Asset Design.

- The result of the review by Endeavour Energy is they have advised that a new 11kv feeder needs to be provided to serve the site.
- The proposed 11kv feeder will be rated to provided 5.5MVA capacity.
- As part of Endeavour Energy asset creation path a connection of load application that will be lodged with Endeavour Energy will outline the requirement for the installation of pad mount substations. Based on the proposed electrical demand for the development four 1,000kVa pad mount substations will be installed within the development.
- Endeavour Energy have 132kv transmission system within the development site within easement. Endeavour Energy outline the restrictions to be placed by development near major assets such as their 132kv transmission system within their publication "Living and Working with Electrical Transmission Lines".

SSD-10469 SEARS submission dated 17 June 2020

▪ Endeavour Energy's Network Connections Branch Response

Endeavour Energy's Network Connections Branch has provided the following advice:

Network Connections Branch had responded to the proponent's initial supply enquiry for a proposed data centre development at the subject site in April this year (Endeavour Energy Ref: ENL3661 – 2014/02306/001) indicating that to supply the estimated load would require significant 132 kV feeder works to be established from TransGrid Sydney West Bulk Supply Point 200 Old Wallgrove Road, Eastern Creek to the data centre site and to Endeavour Energy's Blacktown Transmission Substation located at 418 Blacktown Road, Prospect. Network Connections Branch had recently received the application for connection of load for a reduced load for this data centre development. With the reduced load

In response to Endeavour Energy's Network Connection's Branch response, the following outcomes are proposed to enable the logical delivery of infrastructure to the warehouse and distribution centre:

- Development of the site would provide a demand of approximately 4.3MVA (see formal lodgement Service Infrastructure Report Assessment - Appendix B).
- To cater for this level of demand high voltage feeder will need to be laid from the Arndell Park Zone Substation (corner of Walters Road and Holbeche Road – distance approximately 2.3km) to the site.
- The applicant has engaged Edgewater Connections, a Level 3 ASP, to lodge applications with Endeavour Energy to determine any constraints within the electrical supply/distribution system for the area.

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it is likely the developer will be required to provide two 132 kV feeders from Blacktown Transmission Substation to the data centre site. As the works is contestable, the feeder route is subject to further feasibility study by developer's Accredited Service Provider (ASP).

In addition Asset Planning & Performance Branch have advised that it is also likely that Blacktown Transmission Substation requires the extension of the 132 kV busbar to install two 132 kV feeder bays and circuit breakers for the new feeder connections, as well as relocation of a 132 kV feeder within Substation. The final scope of works is still subject to detailed feasibility study and will be confirmed via Endeavour Energy's normal application process.

As such the applicant and their ASP should continue to complete the application process with Endeavour Energy's Network Connections Branch are managing the conditions of supply. However the applicant will need to contact Endeavour Energy's Network Connections Branch (via Head Office enquiries on telephone: 133 718 or (02) 9853 6666 from 9am - 4:30pm) if this Development Application:

- Includes any contestable works projects that are outside of the existing approved / certified works.
- Results in an electricity load that is outside of the existing Supply / Connection Offer requiring the incorporation of the additional load for consideration. This is due to load being based on a desktop assessment using an After Diversity Maximum Demand (ADMD) where demand is aggregated over a large number of customers providing an ADMD for the site / per lot. Depending on the actual development proposed for the site, the ADMD provided may not be sufficient.

- Edgewater Connections have received a response from Endeavour Energy for the Technical Review Request that was lodged (see formal lodgement Service Infrastructure Report Assessment - Appendix B).
- The result of the review by Endeavour Energy is they have advised that a new 11kv feeder needs to be provided to serve the site.
- The proposed 11kv feeder will be rated to provided 5.5MVA capacity.
- As part of Endeavour Energy asset creation path a connection of load application that will be lodged with Endeavour Energy will outline the requirement for the installation of pad mount substations. Based on the proposed electrical demand for the development four 1,000kVA pad mount substations will be installed within the development.
- Endeavour Energy have 132kv transmission system within the development site within easement. Endeavour Energy outline the restrictions to be placed by development near major assets such as their 132kv transmission system within their publication "Living and Working with Electrical Transmission Lines".

▪ Network Asset Design

Endeavour Energy's Company Policy 9.2.5 'Network Asset Design', includes the following requirements for electricity connections to new urban subdivision / development:

Reticulation Policy

The masterplan will result in the relocation and removal of existing overhead reticulation systems. New electrical infrastructure to facilitate the proposed development will be located underground. This is to comply with the Endeavour Energy requirements for new infrastructure to be reticulated as well as Section 7.4 of the Planning for Bush Fire Protection (PBP). The PBP requires all new

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In order to improve the reliability performance of and to reduce the operating expenditure on the network over the long term the company has adopted the strategy of reusing news lines to be either underground cables or where overhead is permitted, to be predominately of coveted or insulated construction.

Notwithstanding this strategy, bare wire overhead construction is appropriate and permitted in some situations as detailed below.

In areas with the potential for significant overhanging foliage. CCT is used to provide increased reliability as it is less susceptible to outages from wind-blown branches and debris than bare conductors. CCT must only be used in treed areas as the probability of a direct lightning strike is low. In open areas where the line is not shielded from direct lightning strike, bare conductors must generally be used for 11kV and 22kV reticulation.

Non-metallic Screened High Voltage Aerial Bundled Cable (**NMSHVABC**) must be used in areas which are heavily treed and where it is not practicable to maintain a tree clearing envelope around the conductors.

Reticulation of new residential subdivisions will be underground. In areas of low bushfire consequence, new lines within existing overhead areas can be overhead, unless underground lines are cost justified or required by either environmental or local council requirements.

Where underground reticulation is required on a feeder the supplies a mixture of industrial, commercial and/or residential loads, the standard of underground construction will apply to all types of load within that development.

Extensions to the existing overhead 11kV/22kV network must generally be underground. Bare wire will be used for conductor replacements and augmentations except in treed areas where CCT must be used.

▪ Streetlighting

The streetlighting for the proposed development should be reviewed and if necessary upgraded to comply with the series of standards applying to the lighting of roads and public spaces set out in with Australian/New Zealand Standard AS/NZS 1158: 2010 'Lighting for roads and public spaces' as updated from time to time.

and existing electrical infrastructure to be provide for a development be located underground.

The applicant has engaged Edgewater Connection, a Level 3 ASP, to lodge applications with Endeavour Energy to determine any constraints within the electrical supply / distribution system for the area. From initial correspondence with Endeavour Energy, a 11kV electrical feeder will be required from the Arndell Park Zone Substation.

All required infrastructure to service the development will be funded by the applicant.

The street lighting design for the proposal will adhere to the relevant Australian Standards as part of the upgrade works to Flushcombe Road and Augusta Street.

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Whilst the determination of the appropriate lighting rests with the road controlling authority, Endeavour Energy as a Public Lighting Service Provider is responsible for operating and maintaining the streetlights on behalf of local councils, Roads and Maritime Services and other utilities in accordance with the NSW Public Lighting Code 2019 (Code) as updated from time to time. Endeavour Energy recognises that well designed, maintained and managed Public Lighting offers a safe, secure and attractive visual environment for pedestrians and drivers during times of inadequate natural light.

For any Code implementation and administration / technical matters please contact Endeavour Energy's Substation Mains Assets Section via Head Office enquiries on telephone: 133 718 or (02) 9853 6666 from 9am - 4:30pm or email mainsenquiry@endeavourenergy.com.au .

Bushfire

Although industrial uses are not covered by Chapters 5 to 7 of NSW Rural Fire Service 'Planning for Bush Fire Protection 2019' (PBP), the aim and objectives of PBP still need to be considered and a suitable package of bush fire protection measures should be proposed commensurate with the assessed level of risk to the development. PBP provides the following advice regarding electricity services:

PERFORMANCE CRITERIA	ACCEPTABLE SOLUTIONS
The intent may be achieved where:	
ELECTRICITY SERVICES <ul style="list-style-type: none"> location of electricity services limits the possibility of ignition of surrounding bush land or the fabric of buildings. 	<ul style="list-style-type: none"> where practicable, electrical transmission lines are underground; where overhead, electrical transmission lines are proposed as follows: <ul style="list-style-type: none"> lines are installed with short pole spacing of 30m, unless crossing gullies, gorges or riparian areas; and no part of a tree is closer to a power line than the distance set out in ISSC3 <i>Guideline for Managing Vegetation Near Power Lines</i>.

9.1.1 BUSHFIRE RISK MANAGEMENT

1.0 POLICY STATEMENT

The company is committed to the application of prudent asset management strategies to reduce the risk of bushfires caused by network assets and aerial consumer mains to as low as reasonably practicable (ALARP) level. The company is also committed to mitigating, the associated risk to network assets and customer supply reliability during times of bushfire whilst achieving practical safety, reliability, quality of supply, efficient investment and environmental outcomes. The company is committed to compliance with relevant acts, regulations and codes.

Section 7.4 of the PBP requires all new and existing electrical infrastructure to be provide for a development be located underground. Electrical infrastructure being delivered for the proposal will be reticulated as a result.

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Accordingly the electricity network required to service the proposed development must be fit for purpose and meet the technical specifications, design, construction and commissioning standards based on Endeavour Energy's risk assessment associated with the implementation and use of the network connection / infrastructure for a bushfire prone site. In assessing bushfire risk, Endeavour Energy has traditionally focused on the likelihood of its network starting a bushfire, which is a function of the condition of the network. Risk control has focused on reducing the likelihood of fire ignition by implementing good design and maintenance practices. However the potential impact of a bushfire on its electricity infrastructure and the safety risks associated with the loss of electricity supply are also considered.

▪ Flooding and Drainage

The electricity network required to service an area / development must be fit for purpose and meet the technical specifications, design, construction and commissioning standards based on Endeavour Energy's risk assessment associated with the implementation and use of the network connection / infrastructure for a flood prone site. Risk control has focused typically on avoiding the threat, but where this is not possible, reducing the negative effect or probability of flood damage to assets by implementing good design and maintenance practices.

Distribution substations should not be subject to flood inundation or stormwater runoff ie. the padmount substation cubicles are weatherproof not flood proof and the cable pits whilst designed to be self-draining should not be subject to excessive ingress of water. Section 7 'Substation and switching stations' of Endeavour Energy's Mains Construction Instruction MCI 0006 'Underground distribution construction standards manual' provides the following details of the requirements for flooding and drainage in new distribution substation locations.

▪ Subdivision of Easements

Endeavour Energy's preference is to have continuity of its easements over the most direct and practicable route affecting the least number of lots as possible. Therefore, it generally does not support the subdivision of easements (even in part) and their incorporation into to multiple / privately owned lots. The

Based on the proposed electrical demand for the development five 1,000kVa pad mount substations will be installed within the development. All five substations are to meet Endeavour Energy's Standards as part of certified design and are positioned outside flood prone areas, above the 1 in 100 year flood event's affected area.

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Currently, EE benefits from easement rights over the existing overhead electrical reticulation assets in the Augusta Road corridor. DP1263824 and DP1300050 closed a substantial part of Augusta Street as a public road and easement rights were granted to EE as part of the road closure process.

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incorporation of electricity easements into privately owned lots is generally problematic for both Endeavour Energy and the landowner and requires additional easement management to ensure no uncontrolled activities / encroachments occur within the easement.

Although in this instance the subdivision will result in the consolidation of lots, the applicant must demonstrate how the subdivision has taken into consideration to minimising the impact on the easement rights. This is particularly important where there are poles or structures and changes in direction to a line route. In the event of fallen conductors or faults in underground cables, access to the poles or cable pits to restring or pull cables is essential for restoring electricity supply. The number and length of crossings should be kept to a minimum eg. crossings should be or close to perpendicular to the overhead power lines or underground cables and must be at least half the easement width beyond any pole or structure.

However, if the subdivision does result in the incorporation of Endeavour Energy's easement into multiple lots, not only must the easements, rights and restrictions, covenants etc. be retained over the effected lots and in accordance with the requirements of NSW Land Registry Services (LRS), but Endeavour Energy may need to include additional requirements / restrictions to be registered on title/s to the lots encumbered by the easements.

- Protected Electrical Works

In regard to the low voltage and 11 kV high voltage overhead power lines traversing the site which are not held under easement, these are protected assets and deemed to be lawful for all purposes under Section 53 'Protection of certain electricity works' of the Electricity Supply Act 1995 (NSW). Essentially this means the owner or occupier of the land cannot take any action in relation to the presence in, on or over the land of electricity works ie. the electricity infrastructure cannot be removed to rectify the encroachment. These protected assets are

These sections of the closed road are in the ownership of Blacktown Council who have agreed to sell the land affected by the closed road to the Applicant.

The masterplan for the proposed development indicates that these easements within the old Augusta Road corridor will need to be released/extinguished when the existing overhead reticulation system is decommissioned, and assets are removed.

New electrical systems will be installed in the new development such as pad mount substations and underground electrical cabling. These assets will have new easements created which will benefit EE.

Substantial high voltage transmission systems exist within an easement corridor along and adjacent to the southern boundary of the site. These easements will NOT be released and the rights that EE currently enjoy through these easements will continue.

Physical access by EE maintenance personnel and equipment is available through the proposed access driveways and carparking/vehicle hardstand areas. It is anticipated easements creating rights of access over the driveways/hardstand areas will be created to benefit EE and enable access to EE infrastructure.

The current EE assets that are not contained within easement are overhead reticulation assets located within Lot 4 DP583442 and Lot 4 DP585492.

It is recognised that EE has rights over these assets pursuant to the Electricity Supply Act 1995 including full and free uninterrupted access across the land comprised within the proposed development.

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managed as if an easement is in place - please refer to the below point 'Easement Management / Network Access'.

In accordance with Endeavour Energy's Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights', as shown in the following extracts of Table 1 – 'Minimum easement widths', the low voltage and 11 kV high voltage overhead power lines both require a 9 metre minimum easement width ie. 4.5 metres to both sides of the centre line of the poles / conductors.

Table 1 - Minimum easement widths

	Voltage	Asset Type	Construction	Minimum Easement (m)
Overhead Assets	400V–22kV	Bare Construction	All	9
		ABC		
		CCT		

ABC = Aerial Bundled Cables CCT = Covered Conductor Thick

These distances must be maintained at all times to all buildings and structures and regardless of the Council's allowable building setbacks etc. under its development controls. As a guide please find attached a copy of Endeavour Energy Drawing 86232 'Overhead Lines Minimum Clearances Near Structures'. Even if there is no issue with the safety clearances to the building or structure, ordinary persons must maintain a minimum safe approach distance of 3.0 metres to all voltages up to and including 132,000 volts / 132 kV. Work within the safe approach distances requires an authorised or instructed person with technical knowledge or sufficient experience to perform the work required, a safety observer for operating plant as well as possibly an outage request and/or erection of a protective hoarding.

▪ Easement Management / Network Access

The following is a summary of the usual / main terms of Endeavour Energy's electrical easements requiring that the landowner:

- o Not install or permit to be installed any services or structures within the easement site.
- o Not alter the surface level of the easement site.

However, these assets will be decommissioned and removed from the subject site and will be replaced by new underground electrical assets required to serve the proposed development.

All assets to be removed and new assets to be created will be undertaken through EE normal asset creation path.

The 132kv transmission lines along the southern boundary have been addressed in the master planning of the site with no development taking place within the electrical easement area. Access to the existing electrical infrastructure will be maintained at all times with access roads provided to all stanchions. Engagement has taken place with Philip Wilson - Easement Officer Property Services (Endeavour Energy) around general restrictions of overhead power lines. A minimum clearance of 3m

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o 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 accordance with such conditions as Endeavour Energy may reasonably impose.

Endeavour Energy's preference is for no activities or encroachments to occur within its easements. However, if any proposed works (other than those approved / certified by Endeavour Energy's Network Connections Branch as part of an enquiry / application for load or asset relocation project) will encroach/affect Endeavour Energy's easements or protected electrical works / assets, contact must first be made with the Endeavour Energy's Easements Officer, Jeffrey Smith, on direct telephone 9853 7139 or alternately email Jeffrey.Smith@endeavourenergy.com.au or Easements@endeavourenergy.com.au .

It is imperative that the access to the existing electrical infrastructure on and in proximity of the site be maintained at all times. To ensure that supply electricity is available to the community, access to the electricity infrastructure may be required at any time. Restricted access to electricity infrastructure by maintenance workers causes delays in power restoration and may have severe consequences in the event of an emergency

▪ Hazardous and/or Offensive Development

Endeavour Energy has traditionally focused on the likelihood of its network starting a fire. However conversely Endeavour Energy believes that applicants and determining authorities should consider the safety risks associated with inappropriate development in proximity of electricity infrastructure that may result in damage to the network and the loss of electricity supply.

Endeavour Energy is aware that the provisions of State Environmental Planning Policy No 33— Hazardous and Offensive Development (SEPP33) that in the preparation of a preliminary hazard assessment electricity infrastructure is not defined / regarded as sensitive land use. However, in similar situations Endeavour Energy has sought further advice from the consultants preparing the preliminary hazard assessment on the basis that, although not a sensitive land use in the traditional / environmental sense, if the electricity infrastructure on or in proximity of the site is damaged, the resulting outage could leave thousands of

is required from conductors in all directions, all ways, all times.

This will include when there is a load on the network and conductors sag under extreme load & heat and sway in very windy positions. A Centre Line Profile (CLP) survey has been provided to ensure compliance.

Engagement with Endeavour Energy's Easement Team will continue through the development. Access to the existing electrical infrastructure will be always enabled via the existing easements and a vehicle access paths below Warehouse 5.

The provisions of Chapter 3 of the Resilience and Hazards SEPP do not apply to the proposal as no hazardous materials are proposed for storage or production onsite. Any future tenant seeking to store dangerous goods or the like would require development consent to be obtained with an appropriate assessment undertaken to confirm the appropriateness of the proposed activities based on detailed information regarding potential risks.

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properties / customers without power. The consultants have been requested to specifically address the risks associated with the proximity of the electricity infrastructure ie. detail design considerations, technical or operational controls etc. to demonstrate as required by SEPP33 that the proposed business / development is suitably located and can be built and operated with an adequate level of safety and pollution control.

▪ Earthing

The construction of any building or structure (including fencing, signage, flag poles, hoardings 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 3000:2018 'Electrical installations' as updated from time to time. This Standard sets out requirements for the design, construction and verification of electrical installations, including ensuring there is adequate connection to the earth. It applies to all electrical installations including temporary builder's supply / connections.

Inadequate connection to the earth to allow a leaking/fault current to flow into the grounding system and be properly dissipated places persons, equipment connected to the network and the electricity network itself at risk from electric shock, fire and physical injury.

No building structure is proposed with Endeavour Energy's Electrical easement. Any other structure will be suitable connected to earth where applicable.

In addition, all contractors are to comply with all Endeavor Energy easement requirements for works within and adjacent to their easement including but not limited to approvals, appropriate plant and equipment (e.g., height limiting machines, earthing machines, etc.), approved spotters, adequate signage and clearance markers prior to entry into the easement.

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▪ Prudent Avoidance

The electricity industry has adopted a policy of prudent avoidance by doing what can be done without undue inconvenience and at modest expense to avert the possible risk to health from exposure to emissions from electricity infrastructure such as electric and magnetic fields (EMF) and noise which generally increase the higher the voltage ie. Endeavour Energy's network ranges from low voltage (normally not exceeding 1,000 volts) to high voltage (normally exceeding 1,000 volts but not exceeding 132,000 volts / 132 kV).

These emissions are usually not an issue but with Council's permitting or encouraging development with higher density, reduced setbacks and increased building heights, but as the electricity network operates 24/7/365 (all day, every day of the year), the level of exposure can increase.

The proposal has been designed to minimise interface of office elements with the powerlines along the southern boundary by locating the majority of offices on the northern elevations where practicable.

The exception to this being the office element for Warehouse 2, which still observes the easement buffer area and is adequately distanced the offices from the powerlines.

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Endeavour Energy believes that irrespective of the zoning or land use, applicants (and Council) should also adopt a policy of prudent avoidance by the siting of more sensitive uses eg. the office component of an industrial building, away from and less susceptible uses such as garages, non-habitable or rooms not regularly occupied eg. storage areas in a commercial building, towards any electricity infrastructure – including any possible future electricity infrastructure required to facilitate the proposed development.

▪ Vegetation Management

The planting of large trees in the vicinity of electricity infrastructure is not supported by Endeavour Energy. Suitable planting needs to be undertaken in proximity of electricity infrastructure (including any new electricity infrastructure required to facilitate the proposed development). 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 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.

Landscaping that interferes with electricity infrastructure may become a potential safety risk, cause of bush fire, restrict access, reduce light levels from streetlights or result in the interruption of supply. Such landscaping may be subject to Endeavour Energy's Vegetation Management program and/or the provisions of the Electricity Supply Act 1995 (NSW) Section 48 'Interference with electricity works by trees' by which under certain circumstances the cost of carrying out such work may be recovered.

▪ Dial Before You Dig

Before commencing any underground activity the applicant is required to obtain advice from the Dial Before You Dig 1100 service in accordance with the requirements of the Electricity Supply Act 1995 (NSW) and associated Regulations. This should be obtained by the applicant not only to identify the location of any underground electrical and other utility infrastructure across the site, but also to identify them as a hazard and to properly assess the risk.

Existing electrical easement area is to be retained and regenerated. Where additional planting is required, small tree planting to take place to comply with Endeavour Energy height restrictions (less than 3m tall).

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A Dial Before You Dig 1100 will be obtained prior to any excavation works.

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<p>▪ Demolition</p> <p>Demolition work is to be carried out in accordance with Australian Standard AS 2601—2001: ‘The demolition of structures’ as updated from time to time. All electric cables or apparatus which are liable to be a source of danger, other than a cable or apparatus used for the demolition works shall be disconnected ie. the existing customer service lines will need to be isolated and/or removed during demolition. Appropriate care must be taken to not otherwise interfere with any electrical infrastructure on or in the vicinity of the site eg. streetlight columns, power poles, overhead power lines and underground cables etc.”</p>	<p>The demolition works will be undertaken via Complying Development Certificate and will be carried out in accordance with the relevant Australian Standards. No demolition works are proposed under SSD-36138263.</p> <p>All services shall be disconnected / made safe prior to commencement of demolition work. A sign off on services will be received by Civil Contractor prior to the commencement of any demolition works.</p> <p>Demolition will begin only when the site has been officially handed over and a sign off on services has been received by the appropriate service providers for appropriate areas.</p>	<p>Appendix P</p>
<p>▪ Removal of Electricity Supply</p> <p>Approval for the permanent disconnection and removal of supply must be obtained from Endeavour Energy’s Network Connections Branch (contact via Head Office enquiries on telephone: 133 718 or (02) 9853 6666 from 9am - 4:30pm) by Accredited Service Providers (ASP) with the relevant class of Authorisation for the type of work being carried out. The work could involve:</p> <ul style="list-style-type: none"> o The disconnection and removal of an underground service cable or overhead service line, o Removal of metering equipment. <p>The written request must be submitted to Endeavour Energy using Form FPJ4603 ‘Permission to Remove Service / Metering by Authorised Level 2 Accredited Service Provider’ which must be accompanied by Notification of Service Works (NOSW) forms provided as a result of service work activity performed by a Level 2 ASP. The retailer must also provide written agreement for the permanent removal of supply.</p>	<p>The overall masterplan will result in the relocation and removal of existing overhead reticulation systems. New electrical infrastructure to facilitate the proposed development will be located underground.</p> <p>The applicant has engaged Edgewater Connections, a Level 3 ASP, to lodge applications with Endeavour Energy to obtain any approvals for the permanent disconnection and removal of supply if required.</p> <p>All required infrastructure to service the development is developer funded.</p>	<p>Appendix P</p>
<p>▪ Site Remediation</p> <p>Endeavour Energy’s Environmental Business Partner section have advised that the remediation of soils impacted by various forms of electricity infrastructure is not uncommon eg. transformer oil associated with leaking substations, pole treatment chemicals at the base of timber poles etc. The method of remediation is</p>	<p>The overall masterplan will result in the relocation and removal of existing overhead reticulation systems. New electrical infrastructure to facilitate the proposed development will be located underground.</p>	<p>Appendix P</p>

generally the removal of the electricity infrastructure, excavation of any contaminated soils and their disposal at a licensed land fill. The decommissioning and removal of the redundant electricity infrastructure will be dealt with by Endeavour Energy's Network Connections Branch as part of the application for the connection of load for the new development.	The applicant has engaged Edgewater Connections, a Level 3 ASP, to lodge applications with Endeavour Energy to obtain any approvals for the decommissioning and removal of the redundant electricity infrastructure. Remediation will be undertaken by suitably qualified remediation contractor at this time.	
EPA letter, dated 6 November 2023		
Based on the information provided, the EPA has no comment on this proposal and no further consultation is required.	Noted	N/A
FRNSW letter, dated 9 October 2023		
Where electric vehicles (EVs) and/or associated EV charging equipment may be present, FRNSW consider that Clauses E1D17 of National Construction Code (NCC) 2022 Volume One (Clauses E1.10 and E2.3 of NCC 2019 Volume One Amendment 1) should be addressed as per the AFAC Position Statement – Electric Vehicles (EV) and EV charging Equipment in the Built Environment.	Use of EV charging equipment will be considered within the Construction Certificate and referred to FRNSW as part of the Performance Based Design Brief phase.	Appendix Q
That safe, efficient, and effective access is provided in accordance with FRNSW fire safety guideline - Access for fire brigade vehicles and firefighters.	Safe and efficient access for fire brigade vehicles and fire fighters will form part of the Construction Certificate considerations. Final strategies will be referred to FRNSW as part of the Performance Based Design Brief phase.	Appendix Q
That an Emergency Plan (EP) is developed for the site in accordance with HIPAP No.1.	This recommendation relates to the storage of 'dangerous goods' onsite. No dangerous goods storage is proposed as part of the development.	Appendix Q
That an Emergency Services Information Package (ESIP) be prepared in accordance with FRNSW fire safety guideline – Emergency services information package and tactical fire plans.	This recommendation relates to the storage of 'dangerous goods' onsite. No dangerous goods storage is proposed as part of the development.	Appendix Q
Heritage Council of NSW letter, dated 6 November 2023		
The Statement of Heritage Impact outlines that the development will impact the remnant rural setting of St Bartholomew's and its views towards the west. In mitigating the development, a neutral colour palette and screen planting is proposed at the eastern end.	Noted.	N/A

<p>While screen planting is supported, the dimensions of the eastern landscape setback are unclear in the architectural and landscape plans. In some areas, this appears to be too narrow for the proposed canopy tree plantings and lower storey planting needed to mitigate the impact. To address this, HNSW recommends the development is amended to provide a minimum 8m landscape buffer within the site boundary at the eastern edge, to enable screen planting to be wholly accommodated and maintained within the subject site.</p>	<p>The amended Architectural Plans and amended Landscape Plans have been updated to incorporate an 8-metre landscape setback area to the eastern site boundary.</p>	<p>Appendix D Appendix F</p>
<p>The Statement of Heritage Impact provides recommendations in relation to unexpected archaeological finds, archival recording, and maintenance of screen planting. These are supported by HNSW.</p>	<p>Noted.</p>	<p>N/A</p>
<p>The Statement of Heritage Impact concludes that the proposed development will not impact heritage items in the vicinity. HNSW advises that the proposal will have an acceptable heritage impact to other SHR items in the vicinity. Advice on impacts to local heritage items should be sought from the local council.</p>	<p>Noted.</p>	<p>N/A</p>
<p>Heritage NSW letter, dated 27 October 2023</p>		
<p>The ACHAR outlines that there is limited potential for subsurface archaeological deposits owing to the degree of past disturbances. However, there are an extensive number of cases where such disturbances have not removed the potential for in situ archaeological deposit. The results of several test excavations and/or monitoring programs during grader scrapes completed at sites in the surrounding area, have demonstrated that despite historical use disturbance, artefacts have been found in sub-surface contexts (e.g., AHIMS ID# 45-5-2648 [AMBS 2002], AHIMS ID# 45-5-4194 [AHMS 2012], AHIMS ID# 45-5-2818 [Navin Officer 2002]), some in association with intact Blacktown soils (e.g., AHIMS 45-5-4726 [GML 2016]).</p> <p>I note that the results of the geotechnical assessment undertaken by Pells Sullivan Meynink (PSM) for the project and provided with the EIS (Appendix S1 – Geotechnical report), indicate that disturbance within the project area is quite variable. Existing fill comprising CLAY material mixed with debris from demolition (e.g., tiles, bricks, and glass bottles), were observed at localised areas where it was found to occur between a depth of 0.1 -0.3 meters below ground surface</p>	<p>Coast Heritage have reviewed the Geotechnical Report and have responded in the ACHAR Memorandum. Response to the matters raised by Heritage NSW have been summarised below:</p> <ul style="list-style-type: none"> ▪ Geotechnical Results: The existence of topsoil and natural soil as well as fill does not prove remnant soil is undisturbed ancient soils as a result. The fill is described as compact red/brown/grey clay at all borehole locations, typical of a B-horizon subsoil in the Blacktown Soil Landscape. Several pits have been observed as overlain with a 'topsoil' layer with intervening fill described as clay or silty clay with high clay content (plasticity). The natural soil in these locations have not been characterised as containing loam or silty loam as is typically present in surviving ancient topsoil layers. <p>The geotechnical results are also consistent with properties that have been historically impacted by clearing and erosion. Exposed original topsoil in upper catchment areas such as the</p>	<p>Appendix O</p>

(Section 6.2 and Section 6.3 of Appendix S1 and Section 6.3.2.1 of the EIS). In contrast, several boreholes indicated the presence of topsoil and natural soil profiles overlying bedrock and an absence of fill (e.g., BH01, BH02, BH07, BH09, BH11, BH12) (Table 4 in section 6.3 of Appendix S1).

The ACHAR notes the low level of visibility encountered during previous site inspections (i.e., MDCA 2007 and Biosis 2020) as well as during the survey completed for the current proposal, where both previously recorded AHIMS sites within the project area (AHIMS ID#45-5-3308 and AHIM ID# 45-5-2361) could not be relocated. The ACHAR also notes that two of the Registered Aboriginal Party (RAP) groups made comments regarding the potential impacts of ground disturbance works on unknown Aboriginal archaeological deposits within the project area and queried if archaeological test excavation would be undertaken to investigate this potential. Test excavations in areas where past disturbance appears minimal would assist in increasing visibility across the project area and thus confirm the presence or absence of archaeological deposits. This would also better address the comments made by the two RAPs.

Our specific recommendation on this matter is as follows:

Please provide greater explication on the potential for subsurface material in light of the results from the geotechnical investigation conducted within the study area (Appendix S1 to the EIS) and justification on why test excavations should not occur prior to construction in the project area. If adequate justification is not provided, Heritage NSW recommends that test excavations occur prior to any construction impacts in the project area.

subject site typically washes downstream and leave areas of clay subsoil exposed with a topsoil humic horizon formed by recent vegetation cover. This has been surveyed as occurring on the site where the soil has been exposed and repeated observed over the past 30 years within which the site has been studied.

The site history also provides considerable evidence of historical disturbance across the site, including clearance of all original vegetation, agricultural use, terracing, significant impacts from use of the western portion of the site and deposition of fill and mounded soil at numerous points across the property.

- Survey Results: Noting the low level of visibility over the 30 years of site surveys due to pasture grass and hardstand, this does not preclude a robust archaeological assessment. As highlighted in the geotechnical assessment, the exposed ground across the site have a clay subsoil profile devoid of original topsoil that could have archaeological potential.

The two archaeological sites recorded within the site (AHIMS #45-5-2361 & AHIMS #45-5-3308) were surface artefacts on exposed subsoil with no associated subsurface archaeological potential.
- Sub-surface Context on Surrounding Sites: The four subsurface contexts where Aboriginal stone artefacts were retrieved in the broader region despite historical disturbance have been revised by Coast Heritage. The following comments have been provided:
 - AHIMS #45-5-4726 was associated with remnant woodland which often contain better preserved soil profiles and commonly identified as Potential Archaeological Deposit (**PAD**) sites. The site does not currently contain any remnant woodland.

-
- AHIMS #45-5-2648, #45-5-2818 and #45-5-4194 all contain artefacts in very low densities in disturbed original topsoil deposits, some intermixed with historical materials. #45-5-2818 and #45-5-4194 are more analogous to the subject site as they were found during testing in the site immediately west while #45-5-2648 was in a floodplain landform. The subject site differs from these recorded artefacts as it has been consistently observed from current and past surveys that the subject site's disturbed original topsoil horizons, similar to those found on the other sites, were not observed. Exposed clay observed its stead.

- Registered Aboriginal Party Commentary: The two Registered Aboriginal Parties (**RAPs**) who raised the issue of archaeological test excavations with the issue since been resolved.

The Darug Custodians Aboriginal Corporation (**DCAC**) mentioned the issue during a survey with on 30 March 2022. As noted on page 22 of the ACHAR submitted with the SSDA, the matter was discussed while on another project and DCAC noted they were comfortable that no archaeological test excavations were required.

Kamilaroi Yankuntjatjara Working Group raised the issue on the bases archaeological deposits could be present. This was not based on an inspection of the site and the RAPs who have done so, Derrubbin LALC and DCAC, have been of the view since 2007 that archaeological test excavations are not warranted.

Based on the assessment of the matters raised by Heritage NSW, test excavations and archaeological investigation of the site are not considered unnecessary in this instance. Focus has been given to the preservation of the Aboriginal objects that have been

	<p>recorded on the property at #45-52361 and their surrounding locality.</p> <p>The recommendations of the ACHAR are, therefore, suitable for the site context and proposed development. Please note the proposed unexpected finds protocol recommendation to be conditioned for the SSDA, to protect for any potential additional archaeological sites.</p>	
<p>2. Section 6.2.10 (Aboriginal Cultural Heritage) of the EIS only recognises seven (7) RAPs for the Project. This is in contrast to the ACHAR which indicates that a total of fifteen (15) groups registered an interest in the Project during Stage 1 of the consultation process. It is unclear why the EIS does not acknowledge all RAPs.</p>	<p>The 15 RAPs as documented in the ACHAR is a true reflection of consultation undertaken during Stage 1 of the consultation process. Listing only seven of the RAPs in the EIS was a drafting error and should have noted the 15 RAPs.</p>	<p>Appendix O</p>
<p>3. The Appendices for Aboriginal community consultation provided with the ACHAR are incomplete and only contain evidence of correspondence in the form of the responses received from RAPs during various stages of the consultation process. The consultation log and documents are required to demonstrate that all RAPs were contacted during all stages of the consultation process in accordance with the Aboriginal cultural heritage consultation requirements for proponents 2010. We note that three RAPs requested that their details not be forwarded to Deerubbin LALC and/or Heritage NSW and thus the redaction of those records is acceptable. However, we note that the following has not been provided:</p> <ul style="list-style-type: none"> ▪ Evidence that the Stage 1 letter requesting registration of interest in the project was sent out to all potential Aboriginal cultural heritage knowledge holders (groups or individuals) who were identified during the stage 1 Agency notification process. ▪ Evidence that the Stage 2/3 Project information and assessment methodology was provided to all RAPs not just the 5 groups who responded. ▪ Evidence that the Stage 4 draft ACHAR was provided to all RAPs not just the 5 groups who responded. ▪ Section 2.3 of the ACHAR refers to the concerns raised by two RAP groups regarding the potential of the proposed earthworks to impact buried 	<p>As requested, the ACHAR Memorandum has appended the following:</p> <ul style="list-style-type: none"> ▪ Evidence that the Stage 1 letter requesting registration of interest in the project was sent out to all potential Aboriginal cultural heritage knowledge holders (groups or individuals) who were identified during the stage 1 Agency notification process (Appendix 1 of the ACHAR Memorandum). ▪ Evidence that the Stage 2/3 Project information and assessment methodology was provided to all RAPs not just the 5 groups who responded (Appendix 2 of the ACHAR Memorandum). ▪ Evidence that the Stage 4 draft ACHAR was provide to all RAPs not just the 5 groups who responded (Appendix 3 of the ACHAR Memorandum). <p>Note the queries raised by the RAPs regarding the archaeological test excavation is discussed above.</p>	<p>Appendix O</p>

Aboriginal archaeological sites and queried if archaeological test excavation would be undertaken in order to investigate this potential. It is then stated in the ACHAR that “We clarified the high level of historical disturbance, and the low Aboriginal archaeological potential within the specific study area” and that “with this understanding, the RAP group was comfortable with no test excavations being undertaken”. Consultation records regarding this clarification, however, have not been provided in the consultation Appendix.

Evidence of the above-mentioned correspondences are required to assist in Heritage NSW’s evaluation of the adequacy and completeness of the consultation process. This evidence can comprise of copies of all dated email records with all relevant email addresses shown and/or delivery / read receipts of the correspondence.

4. As per Requirement 5 of the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (2010), please include mapping with the survey track logs for the areas subject to survey.

Evidence of survey track logs has been requested and prepared as a .kml file sent with the ACHAR Memorandum. The track from the 2007 survey, as reconstructed from marked up survey plans and photographs, has also been provided.

Appendix O

5. Heritage NSW agrees with the current Recommendations (Section 7 of the ACHAR), based on the current state of the archaeological investigation. However, Heritage NSW provides the following further recommendations in addition to the management and mitigation measures included in the ACHAR and EIS.

- The preparation and submission of an Aboriginal Site Impact Recording Form (ASIRF) for Aboriginal site AHIMS #45-5-2361 must be included as a management requirement following completion of development activities within the project area.
- Where, following the review and consideration of the issue raised in matter # 1, adequate justification is provided for not undertaking test excavations, Heritage NSW recommends the implementation of Aboriginal cultural awareness training for all site workers to ensure the efficacy of the proposed unexpected finds protocols. The Aboriginal cultural awareness training must be prepared by an appropriately qualified archaeologist and representative/s of the RAPs. This presentation may be recorded in a suitable format for

Noting the justification provided in item 1, arguing against the necessity of archaeological test excavations, the additional management and mitigation measures listed have been incorporated into the Updated Mitigation Measures table.

Appendix B
Appendix O

ongoing delivery. All RAPs must be provided with the opportunity to participate in the development of the Aboriginal cultural awareness training.

Sydney Water letter, dated 16 January 2024

Water Servicing

The proposed development is located within the Prospect Hill Elevated Water Supply Zone. Based on the estimated flow requirement, the current system has NO capacity to service the development. The proponent is required to upsize the existing DN100 to DN150 in Augusta Street and extend a DN150 main along Great Western Highway.

The advice is provided based on the flow data supplied. If the flow requirement changes, planning advice needs to be re-assessed and re-confirmed.

A Section 73 has been lodged (CN 211159), highlighting the existence of a DN150 main along the verge of the Great Western Highway and appropriately sited to service Warehouse 5. Refer to Sheet 2, Appendix B within the Sydney Water Letter prepared by Vinculum Advisory.

The DN100 water main within Augusta Street is proposed to be upsized to a DN150 water main. It is requested that Sydney Water clarify the "No Capacity" component of the comment.

Appendix S

Wastewater servicing

The proposed development lies in the East Blacktown Scamp and is a part of the North Head system. The site's topography drains to two different carriers to the east and west. Our preliminary assessment indicates that there should be adequate wastewater capacity to service the proposed development.

The advice is provided based on the flow data supplied. If the flow requirement changes, planning advice needs to be re-assessed and re-confirmed.

The Concept Design of sewer extension to service the warehouses under the S73 application (CN211159) is acceptable. The proponent must provide a design for sewer diversion and adjustment works or any changes to the existing main and its long section to Sydney Water for review and approval.

A Section 73 application has been lodged and indicates the existing sewers connections can service the site's topographic drain requirements, subject to the extension of services to the relevant warehouses.

The design of the sewer diversion and adjustment works will be provided as part of the continued Section 73 application process.

Appendix S

Critical Assets

Easement 1

The architecture plans show that an open stormwater management basin is proposed within Sydney Water's watermain easement. Sydney Water does not allow these types of structures to be built within a watermain easement.

The Amended Civil Engineering Drawings prepared by Costin Roe Consulting have been updated to relocate and reconfigure the stormwater management basin outside of the "easement for water supply purposes 10 wide (DP1216918)". The basin is to be located in the "easement for construction 9 wide (DP1216918)" as detailed in the correspondence with Sydney Water on 9 February 2024.

The civil drawings have been updated to allow for the provision of twin DN1600 RCP jacking pipes to enable installation of future Sydney Water piping infrastructure. Consultation with Sydney

Appendix S

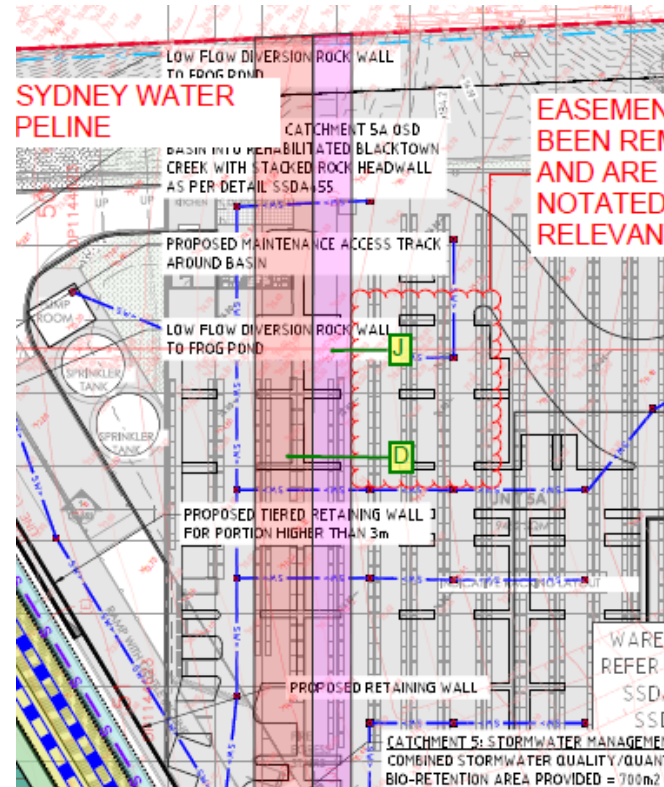
Water as to the design and construct requirements will be undertaken to align with future Sydney Water piping infrastructure, per correspondence from 9 February 2024.

Easement 2

The architecture plans show warehouse 5A is proposed to be built over the water supply easement. Sydney Water deems this unacceptable and suggests the proponent either relocate the building outside of the easement or relinquish the easement subject to approval from Sydney Waters.

The subject water supply easements are (D) and (J) in the red and purples notations on the figure below (also refer to Sheet 5, Appendix B within the Sydney Water Letter). These easements have been extinguished as they are no longer listed on the five relevant titles. As such, they do not apply to the site. Warehouse 5A is not proposed to be built within any registered easements.

Appendix S



<u>DN100 watermain</u>	The proposed water DN100 water main is in the road verge and not the road. If this option is not acceptable, the water main will need to run within private property with an easement.	Appendix S
<p>In relation to the relocation of the DN100 watermain and then reconnecting it to the DN100 watermain in the Great Western Highway, Sydney Water will not allow the water main to be laid along the Great Western Highway due to future maintenance and repair requirements.</p> <p>The proposed watermain must be located within a local road reserve.</p> <p>The Architectural plans indicate that new industrial lots will be created. If this is the case, the watermains fronting the new lots must be provided and located within a local road reserve.</p>		
<u>DN225 sewer main and manholes</u>	Where the DN225 sewer main is intersected by the proposal, the main will be deviated where appropriate to enable 24/7 access.	Appendix S
<p>Sydney Water requires 24/7 unrestricted access to the manholes.</p> <p>The proposed development will impact the DN225 sewer main. Sydney Water notes that this sewer main can be deviated where required by the proponent.</p>		
Trade wastewater requirement	Noted.	Appendix S
<p>If this proposed development is going to generate trade wastewater, the developer must submit an application requesting permission to discharge trade wastewater to Sydney Water's wastewater system. Applicant must wait for approval and issue of a permit before any business activities can commence.</p>		
TfNSW, letter dated 31 October 2023		
<p>1. Concept design drawings in accordance with AUSTRROADS for the proposed modification to Great Western Highway (GWH)/Flushcombe Road signalised intersection and the GWH/Prospect Highway Off-ramp signalised intersection should be provided to TfNSW for review and approval.</p>	<p>Intersection Diagrams have been provided as part of this Submissions Report for review by TfNSW. It is noted that the detailed designs of the two intersections will be prepared as post approval works in collaboration with TfNSW.</p>	Appendix R
<p>2. The concept plans should include the proposed left turn arrangement to the site from GWH and investigation on land dedication requirements.</p>	<p>The Intersection Diagrams includes the proposed left turn arrangement to the site access road from the Great Western Highway. The land dedication requirements to TfNSW will be confirmed as a post consent matter.</p>	Appendix R

3. The Traffic Control Signal (TCS) plans for the upgrade to both proposed signalised intersections should be submitted to TfNSW for review and approval.	Traffic signal plans for both the Flushcombe Road / Great Western Highway / east bound link road / site access road intersections have been provided in the Intersection Diagrams.	Appendix R
4. Swept path analysis should be undertaken for all movements and the simultaneous opposing movements per signal phase and to demonstrates that the proposed layouts of both intersections are able to accommodate the manoeuvres of all vehicles travelling through the intersections without encroachment.	The swept path diagrams provided with the Intersection Diagrams demonstrate the ability of both intersections to accommodate vehicles up to 26m B-doubles without encroachment.	Appendix R
5. The Traffic Impact Assessment (TIA) reports that the traffic survey was undertaken in 2022, which is still within the period impacted by COVID pandemic. Therefore, a factor should be identified to adjust the traffic volumes to a typical traffic condition. Please note that traffic survey undertaken in the second half of 2023, as new normal / post COVID, is not required any adjustment.	<p>The TAIA has been updated noting the following on the October 2022 traffic survey:</p> <ul style="list-style-type: none"> ▪ No COVID restrictions on travel were in place at the time of the October 2022 survey. ▪ Confirmed by comparison of 2019 to 2022 traffic flows: <ul style="list-style-type: none"> – 2019: AM – 3,835 vph, PM – 4,222 vph – 2022: AM – 3,745 vph, PM – 4,245 vph ▪ Post COVID journey patterns result in a lower growth in traffic levels than pre-COVID. 	Appendix J
6. The TIA indicates that the traffic generation rates for warehouse are in accordance with the Guide to Traffic Generating Developments. The updated traffic generation rates set out in the Technical Direction TDT2013/04a should be used for business parks and industrial estates. The traffic survey raw data should be provided to TfNSW for verification.	<p>The traffic generation assessment of the proposal has been updated in the TAIA to reflect Technical Direction TDT2013/04a at section 7.15 in conjunction with a survey of the recently completed LOGOS Villawood warehouse development.</p> <p>Table 7.2 provides a summary of the Business Parks / Industrial Estate traffic survey undertaken by TfNSW. Considering both surveys of traffic generation, the following rates have been adopted:</p> <ul style="list-style-type: none"> ▪ Weekday daily traffic generation – 2.0 vehicles per day per 100m² GFA ▪ Weekday AM/PM road network peak hour traffic generation of 0.20 vehicles per day per 100m² (two-way). 	Appendix J

	The raw data utilised has been provided at Appendix C of the TAIA.	
7. No information is provided to support the heavy vehicle proportion assumptions in the TIA. Further information and data to support this assumption should be submitted to TfNSW for review and endorsement.	<p>Heavy vehicle proportion assumptions in the TAIA have been taken from the survey undertaken of the LOGOS Villawood warehouse development. The following were concluded from a survey of the Villawood estate:</p> <ul style="list-style-type: none"> ▪ Average weekday traffic volumes 958 vehicles per day (two-way with 27% heavy vehicles). ▪ Average weekday AM peak hour volume – 105 vehicles per hours (two-way) with 15% heavy vehicles. ▪ Average weekday PM peak hour volume – 72 vehicles per hour (two-way) with 15% heavy vehicle. <p>Considering the surveyed traffic data for Sydney business parks and industrial estates from TfNSW, a 15% heavy vehicle proportion has been utilised for the AM and PM peaks.</p>	Appendix J
8. No information is provided to support the assumptions in Table 7.2 of the TIA. Further information and data to support these assumptions should be submitted to TfNSW for review and endorsement.	The Villawood survey has been utilised to inform traffic generation assumptions over a typical weekday. Truck flows surveyed include rigid trucks (90%) and articulated trucks (10%). A 70% rigid trucks and 30% articulated trucks assumption has been utilised for the proposal.	Appendix J
9. No information is provided to support the assumptions in Section 7.18 of the TIA. Further information and data to support the trip distribution assumptions should be submitted to TfNSW for review and endorsement.	<p>Section 7.23 of the TAIA states assumptions on distribution of development traffic to the road traffic has been informed by access to the regional road network:</p> <ul style="list-style-type: none"> ▪ 20% to/from the north via Flushcombe Road. ▪ 40% to/from the east via Great Western Highway and Prospect Highway. ▪ 40% to/from the west via Great Western Highway. 	Appendix J
10. The TIA assesses 2 scenarios, which is inadequate to identify the potential impact of the proposed development on existing and future classified road network. The following scenario should be included in the TIA:	Section 7.24 outlines the scenarios assessed for the proposal, informed by TfNSW commentary. They include:	Appendix J

<ul style="list-style-type: none"> ▪ Existing traffic condition; ▪ Future base - Future years for the completion of each stage without development traffic; ▪ Future base(s) with development traffic without proposed intersection upgrade; ▪ Future base(s) with development traffic with proposed intersection upgrade; and ▪ Ten years after the completion of the full development with development traffic. 	<ul style="list-style-type: none"> ▪ base traffic flows (completion year – 2026) without development traffic. ▪ base traffic flows (completion year – 2026) plus development traffic no upgrades. ▪ base traffic flows (completion year – 2026) flows plus development traffic with upgrades. ▪ base plus ten year future traffic flows (2036) without development traffic. ▪ base plus ten year future traffic flows (2036) plus development traffic with upgrades. 	
<p>11. Network SIDRA modelling should be undertaken due to traffic signal coordination along Great Western Highway intersection.</p>	<p>Network SIDRA modelling has been undertaken as part of the amended TAIA.</p>	<p>Appendix J</p>
<p>12. Variable traffic cycle times have been used in SIDRA model, which does not reflect the typical condition. A cycle time of 140 seconds should be used.</p>	<p>Cycle time of 140 seconds will be used for the updated SIDRA modelling.</p>	<p>Appendix J</p>
<p>13. SIDRA modelling file should be submitted to TfNSW for review.</p>	<p>SIDRA modelling data for the proposal has been appended to the amended TAIA.</p>	<p>Appendix J</p>
<p>14. Stormwater management plan and hydraulic calculation for the upgrade of both intersections should provided to TfNSW for review.</p>	<p>TfNSW have agreed with MU Group to delay requirement of a stormwater management plan and hydraulic calculation for the upgrade of the intersection until the Works Authorisation Deed (WAD) stage of the process.</p>	<p>Appendix R</p>
<p>Furthermore, TfNSW provide the following comments on the development application:</p> <p>1. It is a good engineering practice of providing clear explanation to the scenarios being considered in the TIA. This will provide better understanding to the audients who is reading the report.</p>	<p>Section 7.24 of the TAIA sets out the assessment scenarios considered.</p>	<p>Appendix J</p>
<p>2. The subject property shares a common boundary with the Great Western Highway which is a Controlled Access Road by notification in Government Gazette No. 123 of 11 October 1974; Folio 3976 and shown by grey colour and orange hatching on the below Aerial. Access restrictions are in place across this boundary.</p>	<p>Consultation with TfNSW and Council was undertaken between June 2022 and May 2023 regarding direct access to the Great Western Highway for Warehouse 5 among other matters.</p>	<p>Appendix J</p>

<p>3. The subject property shares a common boundary with the Western Motorway which is a Declared Tollway by notification in Government Gazette No. 60 of 15 May 1992; Folio 3368 and shown by blue colour and purple hatching on the below Aerial. Access is denied across this boundary.</p>	<p>No access is proposed to the M4 Motorway.</p>	<p>N/A</p>
<p>4. Further comments to the Green Travel Plan are provided in the attachment.</p>	<p>Refer to Green Travel Plan (GTP) queries below. It is noted that TfNSW recommended a fully developed GPT and TAG be submitted to TfNSW for review prior to occupation.</p>	<p>Appendix J</p>
<p>Green Travel Plan</p> <p><u>Car parking</u>: It is understood that 951 spaces are proposed for provision in response to a minimum requirement of 944 spaces under the Blacktown City Council, Huntingwood Precinct Development Control Plan, August 2011 (HPDCP) and 591 under the RTA, Guide to Traffic Generating Developments, Version 2.2, October 2002.</p> <p>TfNSW request that the parking be reduced to the minimum requirement of 944 and the occupancy be monitored over time, as oversupply of car parking will encourage use of single occupant private vehicles over other sustainable modes of public transport and active transport. This is particularly important given the site is located within 5 minutes walking distance of a bus stop that has services every 15 minutes to Blacktown Station/CBD during peaks periods. Additionally, the site currently has good cycleway connectivity via current and proposed infrastructure.</p>	<p>The proposal has been amended to reduce carparking to 946 car parking spaces which is considered appropriate to balance Council and TfNSW feedback.</p> <p>As part of the final GTP to be developed post consent, the applicant will monitor the use of car parking spaces overtime and promote sustainable modes of transport in lieu.</p>	<p>Appendix D Appendix J</p>
<p><u>Parking Management</u>: TfNSW recommend that management of the parking be considered including prioritising parking on a needs basis, for example, priority parking spaces are to be reserved, and well located, for those who carpool, for visitors, and for those working shifts outside normal business/office hours.</p>	<p>The objectives and guidance for development of a future GTP within the Transport and Accessibility Impact Assessment (TAIA) prepared by CBRK seeks to promote sustainable travel modes and influence travel behaviour. A component of the GTP will be a parking manage scheme to prioritise these modes and give preference to carpooling employees.</p>	<p>Appendix J</p>
<p><u>Bicycle parking and End of Trip Facilities (EoT)</u>: It is noted that 85 bicycle parking spaces are proposed for provision, exceeding the minimum requirement of 69 spaces under Austroads Guidelines. This parking should be located at safe and convenient locations on the site and have safe connectivity provided with external</p>	<p>Details of the End-of-Trip (EoT) facility operations will be established during the development of the final GTP. Bicycle parking will be designed in-line with the relevant Australian Standards. As noted in the architectural plans for each office component, the bicycle parking areas are in convenient locations,</p>	<p>Appendix J</p>

bicycle infrastructure in accordance with AS 2890.3:2015 and Austroads, Bicycle Parking Facilities: Updating the Austroads Guide to Traffic Management, 2016. The TAIA states that end of trip facilities (EoT) will be provided. However, details are not clear on the drawings and therefore, the quantum and suitability cannot be assessed. The TAIA also states that “the end user/tenant of the building is not known” and they “should be made aware of the GTP action strategies that have been agreed for the site, to achieve the mode split targets and the process of monitoring and reviewing the GTP.” This must be mandatory and a condition of the tenancy, not a suggestion. Additionally, no future mode share targets have been provided and must be included in the GTP when it is written.

The EoT must also be documented in the GTP and the Travel Access Guide (TAG) and include information such as the amount of bicycle parking and amount and type of EoT. TfNSW ask that any bicycle parking and EoT—including its provision—should be monitored over time to ensure sufficient supply to encourage active transport to/from and around the site. Some further guidance on bicycle parking and end of trip facilities can be found in the cycleway design toolkit.

with safe connectivity ensured through the separation of bicycle pathways and heavy vehicle movements at the Warehouse tenancies.

The conditions of tenancy leasing will be determined as a post consent matter and in tandem with the development of the GTP.

The provision of bicycle parking and active transport monitoring as part of the Travel Access Guide (**TAG**) will be integrated as part of the GTP.

Mode share targets: With consideration of the forecast traffic generation of the site and resulting pressure on the Great Western Highway/Flushcombe Road intersection and operation near capacity (LoS D) by 2033, the TDM team ask that ambitious, but achievable, mode share targets— both short and longer term— be included in the full GTP.

The development of the GTP will be undertaken as post consent matter. Consideration will be given to the implementation of mode share targets within the GTP.

Appendix J

Monitoring and measuring the GTP: TfNSW appreciates that a final GTP is proposed to be monitored to ensure it is achieving the desired mode share targets and benefits. However, given that no targets have been specified and no tenant has been identified, there is effectively no mechanism in place to ensure that this happens. Additionally, it’s not clear who is responsible for the commitment to the appointment of a Travel Plan Coordinator (Section 4.10). TfNSW asks that the surveys be conducted as part of the monitoring and review process and include questions to obtain data such as employee and visitor residential postcodes to identify the travel origin and destination patterns, as well

The implementation of data monitoring guidelines and employee surveying will be investigated during the development of the GTP.

Appendix J

as modes of the trips. Please see this link for more helpful information on developing a travel plan including surveys etc.

Travel Access Guide: TfNSW requests that a Travel Access Guide (TAG) will be developed for the site as part of the GTP. The TAG will need to be updated on a regular basis to accommodate any relevant changes such as new infrastructure and tenancy changes. For further information please see the Travel Access Guide documentation here. The TAG should also:

- Provide information advising employees and visitors about service routes and timetables for buses is available on the Trip Planner at transportnsw.info/
- Provide information advising employees and visitors that additional information about current cycling routes is available on the Trip Planner at transportnsw.info/
- Promote and provide information any car-pooling options, or parking management options.

Noted. The requirement that a Travel Access Guide be prepared for the site as part of a GTP has been integrated. Ongoing monitoring and changes, where necessary, will be undertaken for each tenancy.

N/A

Submission: A fully developed GTP and TAG should be submitted to TfNSW for review prior to occupation.

Noted. A developed GTP and TAG will be provided to TfNSW prior to occupation.

N/A

Table 8 Response to Public Submissions

Summary of Issue Raised	Response	Responsibility
<p>The Project</p> <p>The proposal will tower over existing residences. The size and location will change the landscape of the local residents, determinately impacting local residents and house prices / resale value.</p> <p>The residential area north of the site is comprised of buildings no taller than 7m in height. The proposal exceeds that height by almost 28m and is therefore not compatible.</p>	<p>The development of a best-in-class warehouse and distribution centre precinct will transition unproductive land into an appropriate land use for the locality and industrial land use zoning. Acknowledging the interceding Great Western Highway and associate noise wall and highway upgrades being undertaken by TfNSW, the VIA confirms the siting of development and landscape strategy will adequately screen the proposed development. A 'major/moderate' significance of impact at Viewpoint 3A to 'minor' or 'negligible' significance of impact at Viewpoints 3B, 3C, 3D, 3E and 3F to residences</p>	<p>Appendix D Appendix H</p>

	<p>interfacing with Warehouse 5, the largest of the proposed warehouses, confirms this outcome.</p> <p>Warehouses 1-4 are standard 16.8m warehouse building. Considering the 20m landscape setback, vegetation screening on both sides of the Great Western Highway and the façade detailing to break up the built form all resolve any built form impacts from these four warehouses.</p> <p>The built form of the multi-storey Warehouse 5 has been altered and improved to create greater visual relief. Changes include varied building heights at the second level office elements, relocation of checkerboard pattern to the first level to draw line of sight away from the building height, installation of vertical aluminium accent battens along the second level and externalising of access star elements to introduce subtle variance into the form to reducing overall building bulk.</p>	
<p>The proposal is a poor fit for the area, as there are no other buildings of that form in close proximity.</p>	<p>The subject site sits within the WSEA, incorporating nine areas viewed as optimised for industrial land uses. Within the Huntingwood Precinct which continues west of the site, there are warehouse and distribution centres of a similar form factor to those proposed such as the QLS group warehouse directly adjacent the site. Further, the location is between the Great Western Highway and M4 Motorway providing additional separation from other development sites and residential areas. The site is optimised for the best-in-class warehouse and distribution centre proposed, being interconnected to the Greater Sydney area while concurrently providing 651 construction jobs and 908 full-time operational jobs for the surrounding area.</p>	<p>N/A</p>
<p>Procedural Matters</p>		
<p>Proposal has not adequately addressed the requirements of Section 2.20 and 2.22(a) – (e) from the Industry and Employment SEPP.</p>	<p>The responses provided in the Statutory Compliance Table appended to the original SSDA in conjunction with the</p>	<p>N/A</p>

	Submissions Report adequately address Section 2.20 and Section 2.22(a) – (e) of Industry and Employment SEPP.	
2.22(a) – The proposal is not relevant to and resonant with local character, heritage and communal aspirations. It is a poor fit and does not respond to context. The local character is primarily single family, low density residential properties surrounded by parkland. A large scale industrial factory occupying as much land as possible does not fit with the surrounding context.	<p>The proposal is for a warehouse and distribution centre on industrially zoned land bound by a highway and motorway. The site is separated by the residential area to the north and the proposed development has been sited and designed to minimise any potential visual or amenity impact to the residences, incorporating 9.61ha of landscaped area.</p> <p>As noted in the Social Impact Assessment prepared for the SSDA, the social value of the proposal from the job creation and amenity for workers from the site planning is of very high social benefit offsetting any medium or low social impact outcomes of the site.</p>	Appendix D
2.22(c) – The visual impact has not been adequately addressed in the EIS, as the proposal landscape screening and 20m landscape setback will not sufficiently cover the multi-storey warehouse.	<p>Visual relief from the revised building design has been discussed in response to the DPHI submission. The aspect and topography of residences to the north generally sit lower than the Great Western Highway, with vegetation providing screening to a portion of residences most immediately affected by the proposal. The revised VIA, incorporating 14 additional viewpoints, highlights this in tandem with the revised design, landscape screening along the northern boundary. The acoustic wall upgrades by TfNSW impede views from Hampton Crescent, minimising potential impacts on residences at Hampton Crescent, Desley Crescent, Tyne Place, Ollier Crescent, and Brae Street.</p>	Appendix H
2.22(d) – Noise impacts from the proposal do not achieve compliance with the operational noise criteria, with heavy truck air braking exceeding sleep disturbance criteria. Compliance is only achieved when assuming 10 truck movements from articulated trucks per night.	<p>The NVIA notes the operational noise criteria are generally consistent with the Potential Noise Trigger Level (PNTL) except for the R06 sensitive receiver at 61 Hampton Crescent, Prospect. The awakening response is a result of heavy vehicle movements on the Warehouse 5 Level 2 down ramp.</p> <p>Considering the wider maximum noise context, the nighttime maximum noise level are in the order of 60-70dB(A) in NCA01</p>	Appendix I

	with 40 maximum events per night above 60. The maximum noise events from infrequent truck movements are therefore lower than the noise from vehicles on the Great Western Highway, which is much closer to the affected receiver.	
2.22(e) – The Flushcombe Road intersection is already a poorly performing intersection. The proposal will further exacerbate the existing traffic environment, causing nuisance to residents modelling of the 2032 predicting average evening delay turning right onto Flushcombe Road to be 407.3 seconds.	The proposal incorporates several road upgrades and connections, including construction of the Warehouse 5 road connection as part of the Prospect Highway upgrades and the upgrade of the Flushcombe Road / Great Western Highway intersection. As shown in the intersection plan, the introduction of a left-in lane from southbound Flushcombe Road onto the highway will improve the traffic experience around this intersection. The amended TAIA notes the 2036 average PM delay for the Flushcombe Road / Great Western Highway intersection is 44 seconds, a satisfactory level of intersection operation.	Appendix J
Economic, Environmental and Social Impacts		
<u>Noise Impacts</u> The noise generated by trucks, forklifts and general operations on residents (some within 200m) will be too great, given the 24/7 operation of the site. The position put forward in the TIA that there will be one out-of-hours truck movement was not viewed as realistic. As noise impacts are already experienced from the Eastern Creek Raceway, are anticipated with the Western Sydney Airport flight paths, as such the operation of the site is anticipated to add to this cumulative noise impact on residents.	The Project Noise Trigger Levels (PNTLs) the project was assessed against are considered the most stringent of the intrusiveness and amenity trigger measures. The mitigated operational noise assessment concludes that the proposal is compliant with the noise criteria across the day, evening and night periods. This takes into account the existing background noise environment currently affecting sensitive receivers.	Appendix I
<u>Traffic Impacts</u> The junction at the intersection of the Great Western Highway and Flushcombe Road is affected by high levels of traffic southbound along Flushcombe Road turning onto the highway. The proposal and its 24/7 operation will further exacerbate this.	A component of the proposal is the upgrade of the Flushcombe Road / Great Western Highway intersection to improve traffic conditions. Refer to the intersection plans prepared by MU Group for additional information. As described in the TAIA, the upgraded intersections (inclusive of the recommendations of the TAIA) would operate with average delays of 39 seconds per vehicle in morning peak and	Appendix J

<p>Even with green travel options to the site, the nearest bus stop is located on the northern side of Flushcombe Road. Utilising this transport option would, therefore, lead to more traffic light phases and contribute to greater traffic impact.</p>	<p>43 seconds in the afternoon peak. The traffic flow effects of the proposed to 2036 revealed average delays of less than 35 seconds per vehicle during morning peak and less than 45 seconds in the afternoon peak. These scenarios for the Flushcombe Road / Great Western Highway conclude the intersection will operate at a 'satisfactory' to 'good' Level of Service.</p>	
<p>Safety of motorists at the Flushcombe Road / Great Western Highway intersection will be further impacted by the proposal.</p>	<p>The proposed incorporates the upgrade of the Flushcombe Road / Great Western Highway intersection. This will introduce a left-hand in lane from Flushcombe Road to the Highway, to improve traffic flow and safety of the intersection for both motorists and pedestrians.</p>	<p>Appendix J</p>
<p><u>Landscape / Biodiversity</u> Removal of existing grassland will affect local animals that frequent the area. The proposed development could drive these animals into the northern residential area.</p>	<p>As noted in the BDAR, during the assessment of the site of the expected species on the site, surveys did not observe any utilising the site. The landscape design and upgrades will serve to improve habitat quality and connectivity, reintroduction biodiversity value into the site that may have been lost from the site's farmed and cultivated history.</p>	<p>Appendix F Appendix K</p>
<p><u>View Impacts</u> Size of development will impact view from residences.</p>	<p>The amended VIA incorporates an additional 14 viewpoints to highlight the visual interface between the residential dwellings and the warehouse buildings. With reference to the multi-storey Warehouse 5, the amended façade design, landscape screening and the concurrent development of Prospect Highway acoustic walls for dwellings along Hampton Crescent has a revised magnitude of change for Viewpoints 3A to 3F of between 'minor' to 'negligible'.</p>	<p>Appendix H</p>
<p><u>Climate Impact</u> The rooftops of the four buildings with concrete car parking area will result in increased urban heat island effect. The 25,000sqm of PV solar panels will not mitigate heat effects but add to them.</p>	<p>The proposal introduces the Urban Heat Island Effect mitigation measures recommended by the ESD Report including:</p> <ul style="list-style-type: none"> ▪ High albedo roofing. ▪ Garden with drought tolerant planting. ▪ Light coloured external materials. 	<p>Appendix L</p>

	<ul style="list-style-type: none"> Plan trees with wide tree canopies. <p>Initiatives such as the landscape treatment around the site and within the conservation areas, the retention of additional tree plantings and the translucent roof sheeting will work to minimise heat production from the warehouse areas. The proposal is seeking a 5-Star Green Star rating, accreditation post consent.</p>	
<p><u>Aboriginal Consultation</u></p> <p>Given artifacts were found on the site, the development should consider amending the design to ensure Aboriginal Heritage is not lost. No attempt was made to attend the Local Aboriginal Land Council (LALC) to explain the impact the development will have on Aboriginal Heritage.</p>	<p>Following engagement with the 15 RAPs, consultation, surveying and assessment of the site was undertaken and documented within the ACHAR and associated ACHAR Memorandum. The ACHAR notes that the LALC was engaged and had no concern with the proposed development, provided harm to the artefact scatterer is avoided. A 40m² by 20m² fenced area at the southeastern corner of Warehouse 3/4, where AHIMS #45-5-2361 is located, will be developed and maintained for the project life to ensure mitigation of damage to this archaeological deposit.</p>	<p>N/A</p>

5. UPDATED PROJECT JUSTIFICATION

This section provides an updated justification and evaluation of the project as a whole.

5.1. PROJECT DESIGN

The proposed development will achieve the project objectives by delivering a best-in-class industrial warehouse and distribution precinct that capitalises on its strategic location and responds to market demand and tenant requirements.

The final design will minimise potential impacts on the environment and amenity of the locality. The layout minimises impact to the biodiversity values of the site. Significant works will be undertaken to enhance the riparian and landscape buffer zones associated with Blacktown Creek and the western drainage swale. The visual, built form and acoustic impacts have been assessed in detail, having specific regard to the northern residential receptors.

5.2. STRATEGIC CONTEXT

The proposal aligns with the strategic direction and objectives established within the broader strategic context established by the NSW Region Plan and District Plan as demonstrated in the original EIS. The delivery of a significant amount of employment generating floor space will also contribute to the continued growth of the freight and logistics network in Western Sydney.

The proposed development supports the economic investment in the Western Sydney Employment Area and will deliver 651 jobs during construction and 908 full time jobs during its operation that will benefit the local community and broader Sydney region.

5.3. STATUTORY CONTEXT

The relevant State and local environmental planning instruments have been assessed as part of the formal EIS submission. 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.
- This EIS has been prepared in accordance with the SEARs as required by Schedule 2 of the EP&A Regulation.
- Consideration is given to the relevant matters for consideration as required under the BC Act and the SSD is supported by a BDAR.
- This SSDA pathway has been undertaken in accordance with the Planning Systems SEPP as the proposed development is classified as SSD.
- Concurrence from TfNSW will be required as per the T&I SEPP for 'traffic generating development'.
- The proposal complies with all relevant provisions under Chapter 2 of the I&E SEPP. The proposed development is consistent with the objectives of the IN1 General Industrial zone.
- The proposed development has been assessed in accordance with the R&H SEPP and the development complies with the relevant clauses.
- The proposal generally accords with the relevant provisions of the HDCP 2011.

5.4. COMMUNITY VIEWS

Community and stakeholder engagement has been undertaken by the applicant and Urbis in the preparation of the SSDA. This includes direct engagement and consultation with:

- Government, agency and utility stakeholders as listed within the SEARs, including TfNSW regarding the connection of the site to the new Prospect Highway intersection and Blacktown City Council regarding the design principles and responding to community feedback.

- Registered Aboriginal Parties, including the Deerubbin Local Aboriginal Land Council and Darug Custodian Aboriginal Corporation.
- Surrounding landowners, Friends of St Bartholomew's, businesses and community members.

This engagement was consistent with the community participation objectives in the Undertaking Engagement Guidelines for State Significant Projects and complied with the community engagement requirements. Feedback obtained from Government agencies, utility stakeholders and the local community have been incorporated into the design and assessment in the EIS.

Following the initial engagement with relevant stakeholders, additional engagement was undertaken with DPHI, Sydney Water and Endeavour Energy to discuss their feedback to the EIS and proposed responses to the issues raised. All relevant matters have been addressed within this Submissions Report.

5.5. LIKELY IMPACTS OF THE PROPOSAL

The proposed development has been assessed considering the potential environmental, economic and social impacts as outlined below:

- **Natural Environment:** the proposal addresses the principles of ESD in accordance with the requirements at Clause 194 of the Regulations and as outlined below:
 - Precautionary principle: the precautionary principle relates to uncertainty around potential environmental impacts and where a threat of serious or irreversible environmental damage exists, lack of scientific certainty should not be a reason for preventing measures to prevent environmental degradation.

The proposed development is committed to exceeding minimum benchmark requirements for sustainability for the benefit of future generations, targeting a 5-star Green Star Design & As Built v1.3 rating and the implementation of 1.4mW PV array on the warehouse roofs.
 - Intergenerational equity: the needs of future generations are considered in decision making and that environmental values are maintained or improved for the benefit of future generations.

The design will address key elements such as energy, potable water, and material consumption to afford future generations ecological equality. This includes the management of rainwater and stormwater, with low flow water fixtures, drought resistant planting, and capturing rainwater for reuse onsite.
 - Conservation of biological diversity and ecological integrity: The proposed development commits to planting native vegetation and implementing integrated landscaping to enhance the overall ecology and biodiversity of the site. The proposal will restore 8.74ha of site area nominated for conservation, a 370% increase from the 2.37ha of existing native vegetation.
 - Improved valuation, pricing and incentive mechanisms: this requires the holistic consideration of environmental resources that may be affected as a result of the development including air, water and the biological realm. It places a high importance on the economic cost to environmental impacts and places a value on waste generation and environmental degradation.

The project will target a waste diversion target of 90% as well as develop specific project waste management strategy to ensure the proposed development pays for the waste and damage it creates.

Overall, the proposal will not have any unacceptable impacts on the natural environmental. The ESD Report (**Appendix L**) identifies initiatives as well as practical direction for implementing the initiatives to promote environmentally responsible design in pursuit of a 5-star Green Star and other relevant accreditations.

- **Built Environment:** The proposal has been assessed in relation to the following key built environment impacts:
 - Built Form: The proposed development is compatible with the existing and future character of development in the WSEA. It reflects the scale envisaged for the zoned industrial precinct while providing design interventions to screen the extent of the warehouse buildings and minimise its impacts on the residential development to the north. The proposal demonstrates best-in-class

warehouse development with ample landscaped areas to enhance the built form and provide for visual screening.

- **Visual Impacts:** The proposal will not result in any adverse visual impacts and the extent of the visual representation is acceptable in the immediate and wider visual context. The building design and landscape screening responds to the sensitive receptors, including the residential area and heritage listed church, with no unacceptable impacts pending implementation of recommended mitigation measures.
- **Traffic and Accessibility:** the Flushcombe Road / Great Western Highway intersection as well as the proposed Prospect Highway / Great Western Highway intersection will continue to operate at an acceptable level of service. Road upgrades required to mitigate any future traffic impacts to 2036 are incorporated in the draft Planning Agreement.
- **Biodiversity:** The proposed development will deliver a total of 9.61 hectares of landscaped area. This includes riparian planting and landscape buffer zones to restore the Blacktown Creek 1st Order watercourse and enhance the identified conservation areas, off-setting the realignment of Blacktown Creek and the western swale. The landscape design will provide employee amenity, reduction in urban heat island effect and screening of the development to the surrounding areas. Eight biodiversity credits will be retired to offset the impacts to the biodiversity value of PCT 3319.
- **Noise and Vibration:** A comprehensive assessment of the potential noise and vibration impacts has been undertaken for both the construction and operational phases of the development which confirms the proposal will not result in any significant adverse impacts. The recommended landscape mounding and acoustic walls along the northern setback will address the identified potential noise sources and respond to community feedback undertaken in the preparation of the proposal.
- **Social:** the proposal will result in a medium social impact, including the following key matters:
 - Increased employment opportunities during the construction and operational phases of the development for the surrounding Blacktown and Western Sydney areas.
 - The proposed development will provide amenities and spaces to support the health and wellbeing of future employees onsite, with facilities such as indoor lunchrooms and covered breakout areas.
 - Targeting a 5 Star green star rating, the proposed development includes ESD initiatives such as rainwater harvesting, drought resistant planting, and PV solar panels.
 - Landscape retention and proposed planting will result in 18.6% canopy coverage, reducing potential impacts associated with the urban heat island effect.
 - The transport outcomes for the site, including the staged implementation of a CTMP, GTP, and road upgrades, will minimise the traffic impact on the surrounding road networks.
 - The integration of the architectural design with the landscape treatment, including extensive setbacks and acoustic measures provides for an attractive amenity outcome and a compatible interface with residents to the north .
- **Economic:** The proposed development has a significant positive economic impact through:
 - Facilitating the retention and optimal use of the existing employment lands supply.
 - Addressing the current shortage of industrial floorspace.
 - Meeting the growing demand for future warehousing and logistics floorspace in a highly suitable location.
 - Creating 651 jobs during the construction phase and 908 full time jobs during operation of the industrial precinct.

The potential impacts can be mitigated, minimised or managed through the measures discussed in detail within the Updated Mitigation Measures Table at **Appendix B**.

5.6. SUITABILITY OF THE SITE

The suitability of the site has been assessed in detail in the preparation of this EIS. This includes a comprehensive assessment of its consistency with the relevant strategic land use and transport policies and level of compliance with the statutory planning controls that apply to the site and the proposed development.

Each of the updated specialist assessments have been considered in assessing the suitability of the site to accommodate the warehouse and distribution centre as outlined within the Submissions Report. The site is considered highly suitable for the proposed development for the following reasons:

- The proposed land use is permissible in the IN1 General Industrial zone in accordance with the I&E SEPP.
- The proposal is consistent with the relevant State and local strategic and statutory policy, including delivery of additional industrial floorspace and employment opportunities within Western Sydney.
- The proposal satisfactorily responds to the siting and design requirements outlined within the I&E SEPP and the Huntingwood DCP, including detailed consideration of impacts to the residential properties to the north.
- The proposal can be accommodated on the site without providing unacceptable impacts to the surrounding road network, including nearby intersections.
- The detailed assessment reports confirm the impacts of the proposed development on the environment or the surrounding context are either negligible or can be mitigated, minimised or managed through the implementation of recommended actions.

5.7. PUBLIC INTEREST

The proposed development is considered in the public interest for the following reasons:

- The proposal will provide up to 651 full time jobs during the construction phase, and up to 908 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 redevelopment of the site will deliver critically needed industrial floor space close to Western Sydney. The Project is fully funded and 'shovel ready' for commencement of construction as soon as possible in Q2 2024.
- The proposal incorporates comprehensive landscaping to present an attractive appearance when viewed from the surrounding road network, minimise the potential visual impacts from the residential properties and heritage-listed church and enhance biodiversity outcomes.
- A comprehensive assessment has been undertaken of the potential environmental impacts and it has been demonstrated that all matters can be satisfactorily mitigated, minimised or managed to avoid any unacceptable impacts.
- The proposal meets sustainability benchmarks and incorporates innovative elements to achieve an environmentally responsible design.
- It can be concluded that on balance, the benefits of the proposal outweigh any adverse impacts and as such, the development is in the public interest.

Having considered all relevant matters, we conclude that the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

An updated table of proposed mitigation measures is provided at **Appendix B** which has regard to the economic, environmental and social impacts of the proposal.

Having considered all relevant matters, there will be no additional environmental impacts as a result of the proposed refinements and clarifications. The refinements include additional measures to ensure any previously known and assessed impacts will be appropriately managed and mitigated where relevant.

On this basis, the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

6. DISCLAIMER

This report is dated 26 March 2024 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of THE TRUSTEE FOR HUNTINGWOOD PROPERTY TRUST (**Instructing Party**) for the purpose of Submissions Report (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A

SUBMISSIONS REGISTER

APPENDIX B

UPDATED MITIGATION MEASURES

APPENDIX C

LIST OF PLANS FOR APPROVAL

APPENDIX D

ARCHITECTURAL PLANS

APPENDIX E

ARCHITECTURAL DESIGN REPORT

APPENDIX F

LANDSCAPE PLANS

APPENDIX G

CIVIL REPORT & DRAWINGS

APPENDIX H

VISUAL IMPACT STATEMENT

APPENDIX I

**NOISE AND VIBRATION IMPACT
ASSESSMENT**

APPENDIX J

**TRAFFIC AND ACCESS IMPACT
ASSESSMENT**

APPENDIX K

BIODIVERSITY DEVELOPMENT ASSESSMENT REPORT

APPENDIX L

ECOLOGICALLY SUSTAINABLE DEVELOPMENT REPORT / NET-ZERO CARBON STATEMENT

APPENDIX M

REMEDIATION ACTION PLAN

APPENDIX N

LONG TERM ENVIRONMENTAL MANAGEMENT PLAN

APPENDIX O

ABORIGINAL CULTURAL HERITAGE ASSESSMENT REPORT MEMORANDUM

APPENDIX P

**INFRASTRUCTURE RESPONSE
MEMORANDUM**

APPENDIX Q

**FIRE SAFETY RESPONSE
MEMORANDUM**

APPENDIX R

INTERSECTION DIAGRAMS

APPENDIX S

**SYDNEY WATER RESPONSE
MEMORANDUM**

APPENDIX T

VEGETATION MANAGEMENT PLAN

