

Contact: Patrick Warren on 9725 0215
Your Ref: SSD 41807966

26 June 2023

Ms Rebecca Groth
Senior Environmental Officer
Department of Planning and Environment
Rebecca.groth@dpie.nsw.gov.au

Dear Ms Groth

ADVICE ON ENVIRONMENTAL IMPACT ASSESSMENT (EIS) – STATE SIGNIFICANT DEVELOPMENT – ROUSELL ROAD WAREHOUSE AND DISTRIBUTION CENTRE (SSD-41807966) (BLACKTOWN)

The following provides for Fairfield City Council's submission in relation to the above proposal.

- 1. Setback to Reedy Creek & light pollution** – It is unclear from the landscape plans what the setback is to the Reedy Creek corridor, this is to be confirmed by the applicant. Lighting is proposed to be provided within this setback that has the potential generate negative impacts on nocturnal fauna within the Reedy Creek corridor. To address this the SSDA shall be conditioned to provide for National Light Pollution Guidelines for wildlife, see link below.

<https://www.agriculture.gov.au/sites/default/files/documents/national-light-pollution-guidelines-wildlife.pdf>

- 2. Landscape Plan** – Due to the proximity to nearby or adjacent natural bushland areas, an amended landscape plan is to be provided to Blacktown City Council that ensures nursery hybrids of locally occurring native species are not planted within 100 metres of natural areas. The landscape plan is to avoid species that are invasive; including native species for example Indian Hawthorn, Gazania, Nandina domestica and Pennisetum.
- 3. Traffic Impact Assessment** – The applicants EIS should consider surrounding development in the Fairfield and Blacktown LGAs and how this impacts the site. The warehouse will have primary access from Roussell Road which in turn relies on Old Wallgrove and Wallgrove Road. Wallgrove Road is a major sub arterial road that is over saturated and is poorly serviced with significant queuing at the AM and PM peaks at key intersections. The applicant should note and consider proposed development that utilises the same haulage route to ensure a robust assessment of traffic impacts occurs, including but not limited to the following.
 - Oakdale East Development – 10 Old Wallgrove Road, Horsley Park.** Proposal to end extractive industry on the current Austral Bricks quarry and the construction of 7 warehouses across the site.
 - Gazcorp Industrial Estate – 813 to 913 Wallgrove Road, Horsley Park** Current vacant site, proposed to turn over into warehouse distribution hub.
 - CSR site – Johnston Crescent, Horsley Park** Approval of onsite masterplan and associated SSDA to cease extractive industries and commence warehouse distribution. Subsequent approvals of various warehouse distribution applications by the DPE onsite in recent years.

4. **Flood Storage** – The proposed warehouse site is affected by the probable maximum flood, as such the construction of a warehousing onsite is reducing the existing flood storage area. The consultant needs to demonstrate that the proposed construction will not increase flood levels to the properties upstream in the Fairfield LGA.
5. **Acoustics** – The consultant has not identified all residential sensitive receivers located within close proximity to the proposal. There are residential receivers located on rural blocks in Horsley Park in the Local Government Area of Fairfield which are located immediately south of the site. These residents are required to be identified as receptors/receivers and consultant shall demonstrate that air quality impacts from the proposal on these receivers has been assessed.
6. **Air Quality** - Within Table 3 Project Air Quality Goals, the consultant has provided air pollutant criteria as indicated in the NSW EPA Approved Methods for Modelling and Assessment Air Pollution, document dated 2017. This document has been superseded with the NSW EPA Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales, dated August 2022. This updated document reflects differing air pollutant criteria as indicated in NEPM 2021. As a result, the applicant will need to amend the report to reflect the most up to date documents and ensure the air impact assessment complies with this most update date document.

Conclusion

As stated above Council officers have raised concerns in relation to the development impact on Reedy Creek and traffic and transport impacts more broadly. The applicants RTS response must address these issues. All comments recieved by other agencies and departments in 2022 must be addressed in particular Blacktown Councils in principal objection. Should you have further questions please contact the undersigned on 9725 0215.



Patrick Warren
Senior Strategic Land Use Planner