



3 May 2021

TfNSW Reference: SYD21/00469/01

DPIE Reference: SSD 17352813

Department of Planning Industry and Environmental  
GPO Box 39  
SYDNEY NSW 2001

Attention: David Koppers

Dear Sir/Madam,

**REQUEST FOR SEARS – HUNTINGWOOD PROCESSING EXPANSION  
65 HUNTINGWOOD DRIVE, HUNTINGWOOD**

Reference is made to Department's correspondence dated 20 April 2021 requesting Transport for NSW (TfNSW) to provide details of key issues and assessment requirements regarding the abovementioned development for inclusion in the *Secretary's Environmental Assessment Requirements (SEARs)*.

TfNSW would like the following to be included in the transport and traffic impact assessment of the proposed development:

1. Details of the current daily and peak hour vehicle, public transport, pedestrian and bicycle movements and existing traffic and transport facilities provided on the road network located adjacent to the proposed development.
2. Details of all traffic types and volumes likely to be generated during construction and operation, including a description of haul routes and vehicle types. Traffic flows are to be shown diagrammatically to a level of detail sufficient for easy interpretation.
3. An assessment of the operation of existing and future transport networks including public transport, pedestrian and bicycle provisions and their ability to accommodate the forecast number of trips to and from the development.
4. Details the type of heavy vehicles likely to be used (e.g. B-doubles) during the operation of the development and the impacts of heavy vehicles on nearby intersections.
5. Details of access to, from and within the site to/from the local road and strategic (motorway) network including intersection location, design and sight distance (i.e. turning lanes, swept paths, sight distance requirements).
6. Impact of the proposed development on existing and future public transport and walking and cycling infrastructure within and surrounding the site.

7. An assessment of the existing and future performance of key intersections using SIDRA or similar traffic model to providing access to the site and any upgrades (road/intersections) required as a result of the development. This is to include the identification and consideration of approved and proposed developments/planning proposals/road upgrades in the vicinity.
8. Plans demonstrating how all vehicles likely to be generated during construction and operation and awaiting loading, unloading or servicing can be accommodated on the site to avoid queuing in the street network.
9. An assessment of predicted impacts on road safety and the capacity of the road network to accommodate the development.
10. Demonstrate the measures to be implemented to encourage employees of the development to make sustainable travel choices, including walking, cycling, public transport and car sharing to include a Green Travel Plan prepared in consultation with TfNSW.
11. Appropriate provision, design and location of on-site bicycle parking, and how bicycle provision will be integrated with the existing bicycle network.
12. Details of the proposed number of car parking spaces and compliance with appropriate parking codes and justify the level of car parking provided on the site.
13. Details of access and parking arrangements for emergency vehicles.
14. Detailed plans of the proposed layout of the internal road network and parking provision on-site in accordance with the relevant Australian Standards.
15. The existing and proposed pedestrian and bicycle routes and end of trip facilities within the vicinity of and surrounding the site and to public transport facilities as well as measures to maintain road and personal safety in line with CPTED principles.
16. An assessment of traffic and transport impacts during construction and how these impacts will be mitigated for any associated traffic, pedestrians, cyclists and public transport operations.
17. Details of travel demand management measures to minimise the impact on general traffic and bus operations, including details of a location-specific sustainable travel plan (Green Travel Plan and specific Workplace Travel Plan) and the provision of facilities to increase the non-car mode share for travel to and from the site.
18. Details of the adequacy of existing public transport or any future public transport infrastructure within the vicinity of the site, pedestrian and bicycle networks and associated infrastructure to meet the likely future demand for the proposed development.
19. Measures to integrate the development with the existing/future public transport network.

**Relevant Policies and Guidelines:**

- Guide to Traffic Generating Developments (Roads and Maritime Services, 2002).
- Cycling Aspects of Austroads Guides.
- NSW Planning Guidelines for Walking and Cycling (Department of Infrastructure, Planning and Natural Resources (DIPNR), 2004).
- Guide to Traffic Management Part 12: Integrated Transport Assessments for Developments (Austroads, 2020).
- Australian Standard 2890.3 Parking facilities, Part 3: Bicycle parking (AS 890.3).

If you have any further questions, Sandra Grimes, Land Use Planner, would be pleased to take your call on (02) 9563 8651 or please email [development.sydney@rms.nsw.gov.au](mailto:development.sydney@rms.nsw.gov.au). I hope this has been of assistance.

Yours sincerely



**Pahee Rathan**

Senior Land Use Assessment Coordinator



Our ref: DOC21/309165  
Senders ref: SSD-17352813

Mr David Koppers  
Planning and Assessment Group  
Department of Planning, Industry and Environment  
4PSQ, 12 Darcy Street  
PARRAMATTA NSW 2150

Dear Mr Koppers

**Subject:** EES comments on Request for SEARs – Huntingwood Processing expansion – 65 Huntingwood Drive, Huntingwood - SSD-17352813

Thank you for your email of 20 April 2021 requesting advice in relation to the Request for Secretary's Environmental Assessment Requirements (SEARs) for this State significant development. The Environment, Energy and Science Group (EES) has reviewed the Scoping Report and provides the following comments and recommendations in Attachment A.

#### *Biodiversity*

EES recommends the proponent addresses the attached standard EES biodiversity requirements.

Please note in relation to point (4) of the standard EES biodiversity environmental assessment requirements in Attachment A the minimum information and spatial data requirements are in Tables 24 and 25 of the Biodiversity Assessment Method (BAM), and as required more broadly by the revised BAM 2020. Other requirements, such as those relating to the BAM Calculator and Biodiversity Offsets and Agreements Management System (BOAMS), are detailed in various guidelines, practice notes, updates and other advices issued by EES to BAM accredited assessors – see <https://www.environment.nsw.gov.au/topics/animals-and-plants/biodiversity/accredited-assessors/assessor-resources>.

#### *Landscaping*

EES recommends the SEARs for the proposal includes the following in relation to landscaping, particularly as the Scoping Report indicates the site contains planted native vegetation associated with Cumberland Plain Woodland, the new processing facility requires the removal of a large number of trees on-site and it notes that where feasible tree replanting at a rate of two new trees for each tree removed will be considered and will be documented in the landscape plans:

- A Landscape Plan, using a diversity of local provenance native species from the relevant native vegetation communities that occur, or once occurred on the site, prepared by a suitably qualified bush regenerator and include details on:
  - the plant species to be used
  - trees removed are replaced at a ratio greater than 2:1 for trees not covered by the biodiversity offset strategy
  - the pot size of trees to be planted - advanced sized trees should be used to increase urban tree canopy cover
  - the area/space required to allow planted trees to grow to maturity
  - plant maintenance regime.

*Building Design*

The climate change projections developed for the Sydney Metropolitan area are used to inform the building design and asset life of the project:

<https://climatechange.environment.nsw.gov.au/Climate-projections-for-NSW/Climate-projections-for-your-region/Metro-Sydney-Climate-Change-Downloads>.

If you have any questions about this advice, please do not hesitate to contact Janne Grose, Senior Conservation Planning Officer via email at [janne.grose@environment.nsw.gov.au](mailto:janne.grose@environment.nsw.gov.au) or on 8837 6017

Yours sincerely



03/05/21

Susan Harrison  
**Senior Team Leader Planning**  
**Greater Sydney Branch**  
**Environment, Energy and Science**

## Attachment A – EES Group Standard Environmental Assessment Requirements

### Biodiversity

1. Biodiversity impacts related to the proposed development are to be assessed in accordance with [Section 7.9 of the Biodiversity Conservation Act 2017](#) the [Biodiversity Assessment Method 2020](#) and documented in a [Biodiversity Development Assessment Report \(BDAR\)](#). The BDAR must include information in the form detailed in the *Biodiversity Conservation Act 2016* (s6.12), *Biodiversity Conservation Regulation 2017* (s6.8) and [Biodiversity Assessment Method 2020](#) including an assessment of the impacts of the proposal (including an assessment of impacts prescribed by the regulations).
2. The BDAR must document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the [Biodiversity Assessment Method 2020](#)
3. The BDAR must include details of the measures proposed to address the offset obligation as follows;
  - The total number and classes of biodiversity credits required to be retired for the development/project;
  - The number and classes of like-for-like biodiversity credits proposed to be retired;
  - The number and classes of biodiversity credits proposed to be retired in accordance with the variation rules;
  - Any proposal to fund a [biodiversity conservation action](#);
  - Any proposal to conduct ecological rehabilitation (if a mining project);
  - Any proposal to make a payment to the Biodiversity Conservation Fund.

If seeking approval to use the variation rules, the BDAR must contain details of the [reasonable steps](#) that have been taken to obtain requisite like-for-like biodiversity credits.

4. The BDAR must be submitted with all spatial data associated with the survey and assessment as per the BAM
5. The BDAR must be prepared by a person accredited in accordance with the Accreditation Scheme for the Application of the Biodiversity Assessment Method Order 2017 under s6.10 of the *Biodiversity Conservation Act 2016*.

## Water and soils

6. The EIS must map the following features relevant to water and soils including:
  - a. Acid sulfate soils (Class 1, 2, 3 or 4 on the Acid Sulfate Soil Planning Map).
  - b. Rivers, streams, wetlands, estuaries (as described in s4.2 of the Biodiversity Assessment Method).
  - c. Wetlands as described in s4.2 of the Biodiversity Assessment Method.
  - d. Groundwater.
  - e. Groundwater dependent ecosystems
  - f. Proposed intake and discharge locations
7. The EIS must describe background conditions for any water resource likely to be affected by the development, including:
  - a. Existing surface and groundwater.
  - b. Hydrology, including volume, frequency and quality of discharges at proposed intake and discharge locations.
  - c. Water Quality Objectives (as endorsed by the NSW Government <http://www.environment.nsw.gov.au/ieo/index.htm>) including groundwater as appropriate that represent the community's uses and values for the receiving waters.
  - d. Indicators and trigger values/criteria for the environmental values identified at (c) in accordance with the [ANZECC \(2000\) Guidelines for Fresh and Marine Water Quality](#) and/or local objectives, criteria or targets endorsed by the NSW Government.
  - e. Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions <http://www.environment.nsw.gov.au/research-and-publications/publications-search/risk-based-framework-for-considering-waterway-health-outcomes-in-strategic-land-use-planning>
8. The EIS must assess the impacts of the development on water quality, including:
  - a. The nature and degree of impact on receiving waters for both surface and groundwater, demonstrating how the development protects the Water Quality Objectives where they are currently being achieved, and contributes towards achievement of the Water Quality Objectives over time where they are currently not being achieved. This should include an assessment of the mitigating effects of proposed stormwater and wastewater management during and after construction.
  - b. Identification of proposed monitoring of water quality.
  - c. Consistency with any relevant certified Coastal Management Program (or Coastal Zone Management Plan).

9. The EIS must assess the impact of the development on hydrology, including:
  - a. Water balance including quantity, quality and source.
  - b. Effects to downstream rivers, wetlands, estuaries, marine waters and floodplain areas.
  - c. Effects to downstream water-dependent fauna and flora including groundwater dependent ecosystems.
  - d. Impacts to natural processes and functions within rivers, wetlands, estuaries and floodplains that affect river system and landscape health such as nutrient flow, aquatic connectivity and access to habitat for spawning and refuge (e.g. river benches).
  - e. Changes to environmental water availability, both regulated/licensed and unregulated/rules-based sources of such water.
  - f. Mitigating effects of proposed stormwater and wastewater management during and after construction on hydrological attributes such as volumes, flow rates, management methods and re-use options.
  - g. Identification of proposed monitoring of hydrological attributes.

(END OF SUBMISSION)



DOC21/301904

Mr D Koppers  
NSW Planning  
Locked Bag 5022  
Parramatta NSW 2124

Email: [david.koppers@planning.nsw.gov.au](mailto:david.koppers@planning.nsw.gov.au)

Dear Mr Koppers,

**Charter Hall Holdings Pty Ltd - Huntingwood Processing Expansion,  
65 Huntingwood Drive, Huntingwood – Request for SEAR – SSD -17352813**

I refer to your email to the Environment Protection Authority (EPA) dated 20<sup>th</sup> April 2021 requesting input for the Secretary's Environmental Assessment Requirements (SEARs) to guide the preparation of an Environmental Impact Statement (EIS) for the above project (SSD-17352813).

This project involves an expansion of Charter Hall Holdings Pty Ltd's existing bakery operations at 65 Huntingwood Drive, Huntingwood. This expansion will involve construction of a new processing facility, a new ingredient silo, relocation and construction of a storage building and a warehouse, and other modifications to the site.

The regulatory framework, including the applicability of the *Protection of the Environment Operations (POEO) Act 1997* and any associated regulations, should be outlined in the EIS. In assessing this information, Charter Hall Holdings Pty Ltd should review the EPA Guide to Licensing on the need to obtain an Environment Protection Licence (EPL) for the proposed expansion. Based on the preliminary information provided, it would appear unlikely that the development will require an EPL under the POEO Act.

The environmental outcomes of the project should be to ensure:

- emissions do not cause adverse impact upon human health or the environment.
- no offensive odours are caused or permitted from the premises.
- emissions of dust from the premises (including material handling, storage, processing, haul roads, transport and material transfer systems) are prevented or minimised.
- there is no pollution of waters (including surface and groundwater).
- any waste generated at the site should be assessed, classified and managed in accordance with the *Waste Classification Guidelines* and documented in the EIS.
- any contaminated land is identified and appropriately managed for the purpose of reducing the risk of harm to human health or any other aspect of the environment.

These should be assessed in accordance with any relevant guidelines/documents listed in **Attachment A**.

Phone 131 555

Phone +61 2 9995 5555  
(from outside NSW)

TTY 133 677

ABN 43 692 285 758

Locked Bag 5022

Parramatta  
NSW 2124 Australia

4 Parramatta Square

12 Darcy St, Parramatta  
NSW 2150 Australia

[info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au)

[www.epa.nsw.gov.au](http://www.epa.nsw.gov.au)

The EIS should:

- describe mitigation and management options that will be used to prevent, control, abate or mitigate identified environmental impacts (including any cumulative impacts) associated with the project and to reduce risks to human health and prevent the degradation of the environment. This should include an assessment of the effectiveness and reliability of the measures and any residual impacts after these measures are implemented. Appropriate Best Management Practices must be outlined.
- Include an Air Quality Impact Assessment (AQIA) prepared in accordance with the EPA's *Approved Methods and Guidance for the Modelling & Assessment of Air Pollutants in NSW*.
- identify and describe all potential water discharges from the site (including both construction and operational phases) that could result in potential pollution of waters.
- include a Noise Impact Assessment prepared in accordance with the NSW *Noise Policy for Industry*.
- detail the type and quantity of any chemical substances to be used or stored at the site and describe arrangements for their safe use and storage in accordance with relevant legislation.
- address how the proponent intends to ensure their due diligence in potential contracts for spoil movement off site (if any). This is to ensure it is moved and received at facilities with consent and licensing in place for the category of the spoil.

If you have questions regarding the above, please phone Jessica Wilks on (02) 9995 5215

Yours sincerely,



3/5/2021

**GREG NEWMAN**  
**Acting Unit Head Regulation**

## ATTACHMENT A

Title	Web address
<b>Licensing</b>	
Protection of the Environment Operations Act 1997	<a href="http://www.legislation.nsw.gov.au/maintop/view/inforce/act+156+1997+cd+0+N">http://www.legislation.nsw.gov.au/maintop/view/inforce/act+156+1997+cd+0+N</a>
EPA Guide to Licensing	<a href="http://www.epa.nsw.gov.au/licensing/licenceguide.htm">http://www.epa.nsw.gov.au/licensing/licenceguide.htm</a>
<b>Air</b>	
Approved Methods for Modelling and Assessment of Air Pollutants in NSW (2005)	<a href="http://www.epa.nsw.gov.au/resources/air/ammodelling05361.pdf">http://www.epa.nsw.gov.au/resources/air/ammodelling05361.pdf</a>
Approved Methods for the Sampling and Analysis of Air Pollutants in NSW	<a href="http://www.epa.nsw.gov.au/resources/air/07001amsaap.pdf">http://www.epa.nsw.gov.au/resources/air/07001amsaap.pdf</a>
Technical Notes - Assessment and Management of Odour from Stationary Sources in NSW	<a href="http://www.epa.nsw.gov.au/air/odour.htm">http://www.epa.nsw.gov.au/air/odour.htm</a>
POEO (Clean Air) Regulation 2010	<a href="http://www.legislation.nsw.gov.au/maintop/view/inforce/subordleg+428+2010+cd+0+N">http://www.legislation.nsw.gov.au/maintop/view/inforce/subordleg+428+2010+cd+0+N</a>
Air quality guidance note Construction sites	<a href="http://www.epa.nsw.gov.au/resources/air/mod3p3construc07268.pdf">http://www.epa.nsw.gov.au/resources/air/mod3p3construc07268.pdf</a>
<b>Water</b>	
Water Quality Objectives	<a href="http://www.environment.nsw.gov.au/ieo/index.htm">http://www.environment.nsw.gov.au/ieo/index.htm</a>
ANZECC (2000) Guidelines for Fresh and Marine Water Quality	<a href="http://www.environment.gov.au/water/publications/quality/index.html">http://www.environment.gov.au/water/publications/quality/index.html</a>
Approved Methods for the Sampling and Analysis of Water Pollutant in NSW (2004)	<a href="http://www.epa.nsw.gov.au/resources/legislation/approvedmethods-water.pdf">http://www.epa.nsw.gov.au/resources/legislation/approvedmethods-water.pdf</a>
Managing Urban Stormwater: Soils and construction - Volume 1	<a href="https://www.environment.nsw.gov.au/research-and-publications/publications-search/managing-urban-stormwater-soils-and-construction-volume-1-4th-edition">https://www.environment.nsw.gov.au/research-and-publications/publications-search/managing-urban-stormwater-soils-and-construction-volume-1-4th-edition</a>
<b>Noise and Vibration</b>	
Interim Construction Noise Guideline (2009)	<a href="http://www.epa.nsw.gov.au/noise/constructnoise.htm">http://www.epa.nsw.gov.au/noise/constructnoise.htm</a>
Assessing Vibration: a technical guideline (2006)	<a href="http://www.epa.nsw.gov.au/noise/vibrationguide.htm">http://www.epa.nsw.gov.au/noise/vibrationguide.htm</a>
Industrial Noise Policy (EPA, 2000) and Industrial Noise Policy Application Notes	<a href="http://www.epa.nsw.gov.au/noise/industrial.htm">http://www.epa.nsw.gov.au/noise/industrial.htm</a>
NSW Road Noise Policy (2011)	<a href="http://www.epa.nsw.gov.au/noise/traffic.htm">http://www.epa.nsw.gov.au/noise/traffic.htm</a>
<b>Waste</b>	
Waste Classification Guidelines (DECC, 2008)	<a href="http://www.epa.nsw.gov.au/waste/envguidlins/index.htm">http://www.epa.nsw.gov.au/waste/envguidlins/index.htm</a>
EPA's Better Practice Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities (Dec 2012)	<a href="https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/managewaste/120960-comm-ind.pdf">https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/managewaste/120960-comm-ind.pdf</a>
<b>Contaminated Land</b>	

<b>Title</b>	<b>Web address</b>
State Environmental Planning Policy 55 – Remediation of Land.	<a href="http://www.planning.nsw.gov.au/assessingdev/pdf/gu_contam.pdf">http://www.planning.nsw.gov.au/assessingdev/pdf/gu_contam.pdf</a>
Contaminated Land Management Act 1997	<a href="https://www.legislation.nsw.gov.au/view/html/inforce/current/act-1997-140">https://www.legislation.nsw.gov.au/view/html/inforce/current/act-1997-140</a>
Contaminated Land Management Regulation 2013	<a href="https://www.legislation.nsw.gov.au/view/html/inforce/current/sl-2013-0491">https://www.legislation.nsw.gov.au/view/html/inforce/current/sl-2013-0491</a>



Our ref: DOC21/301841

David Koppers  
Department of Planning, Industry and Environment  
320 Pitt Street  
SYDNEY NSW 2000

By email: [David.Koppers@planning.nsw.gov.au](mailto:David.Koppers@planning.nsw.gov.au)

Dear Mr Koppers

**Request for Secretary's Environmental Assessment Requirements (SEARS) for Huntingwood Processing Expansion (SSD-17352813)**

---

Thank you for your referral dated 20 April 2021 inviting SEARS input from the Heritage Council of NSW on the above State Significant Development proposal.

The subject site is not listed on the State Heritage Register (SHR), nor is it in the immediate vicinity of any SHR items. Further, the site does not contain any known historical archaeological relics. Therefore, no referral to the Heritage Council of NSW is required. The Department does not need to refer subsequent stages of this proposal to the Heritage Council of NSW.

If you have any questions regarding the above advice, please contact Gary Hinder, A/Senior Customer Strategies Officer, at [Gary.Hinder@environment.nsw.gov.au](mailto:Gary.Hinder@environment.nsw.gov.au) or on 9873 8547.

Yours sincerely

**Anna London**  
A/Senior Team Leader Customer Strategies  
Heritage NSW  
Department of Premier and Cabinet  
**As Delegate of the Heritage Council of NSW**  
3 May 2021



Mr David Koppers  
Energy Resources Assessments  
Department of Planning, Industry & Environment  
david.koppers@planning.nsw.gov.au

Our reference: DOC21/301834

*Referred through the Major Projects Portal*

Dear David

**HERITAGE NSW – ABORIGINAL CULTURAL HERITAGE REGULATION  
SECRETARY’S ENVIRONMENTAL ASSESSMENT REQUIREMENTS (SEARS)**

**Project: Huntingwood Processing Expansion  
SSD application no: 17352813**

---

Thank you for requesting our input on the draft Planning Secretary’s Environmental Assessment Requirements (SEARs) for the above state significant project.

Heritage NSW has reviewed the available supporting documentation and has no recommendations for SEARs for the proposed development in relation to Aboriginal cultural heritage matters based on the information provided.

If you have any questions regarding these comments, please contact Rebecca Yit, Archaeologist at Heritage NSW, on 4927 3244 or [rebecca.yit@environment.nsw.gov.au](mailto:rebecca.yit@environment.nsw.gov.au).

Yours sincerely

**Dr Samantha Higgs  
Senior Team Leader  
Aboriginal Cultural Heritage Regulation - North  
Heritage NSW**

Date: 29 April 2021

**Public Authority Response****Monday, 26 April 2021 9:38:48 AM AEST**

## Notes:

DPI Biosecurity and Food Safety advise that, in relation to food safety the proponents should note that the NSW Food Safety Code requires food for sale to be safe and suitable for human consumption and that there is no misleading conduct. The proponents should refer to <https://www.foodauthority.nsw.gov.au/about-us/legislation>

DPI Agriculture has no environmental assessment requirements for this proposed development.



File Ref. No: BFS21/1277  
TRIM Doc. No: D21/30748  
Contact: John Hawes - Infrastructure Liaison Unit

10/05/2021

**DAVID KOPPERS**

[David.Koppers@planning.nsw.gov.au](mailto:David.Koppers@planning.nsw.gov.au)

Department of Planning, Industry & Environment.

Dear David,

**Re: \*SEARs - Huntingwood Processing Expansion - SSD-17352813 – DPIE\***

Thank you for your submission for the above development to Fire & Rescue NSW (FRNSW) for review and agency input.

It is understood that Charter Hall Holdings Pty Ltd (the Applicant) is proposing the expansion of the Huntingwood Processing Facility at 65 Huntingwood Dr, Huntingwood.

FRNSW have reviewed the submitted SEARs Scoping Report prepared by Urbis Pty Ltd in support of the proposal and have no comment or requirements to be addressed in the preparation of the Environmental Impact Statement (EIS).

We request that we be given the opportunity to review and provide comment on the EIS upon its release for exhibition.

For further information please contact the Fire Safety Infrastructure Liaison Unit, referencing FRNSW file number **BFS21/1277**. Please ensure that all correspondence in relation to this matter is submitted electronically to [firesafety@fire.nsw.gov.au](mailto:firesafety@fire.nsw.gov.au)

Yours Sincerely,



**SUPERINTENDANT JOHN HAWES**  
INFRASTRUCTURE LIAISON UNIT  
Community Safety Directorate | Fire and Rescue NSW

T: 02 9742 7434  
E: [firesafety@fire.nsw.gov.au](mailto:firesafety@fire.nsw.gov.au)  
A: 1 Amarina Avenue, Greenacre NSW 2190 | Locked Mail Bag 12, Greenacre, NSW 2190  
[www.fire.nsw.gov.au](http://www.fire.nsw.gov.au)

---



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

11 May 2021

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

[David.koppers@planning.nsw.gov.au](mailto:David.koppers@planning.nsw.gov.au)

**Attention: Mr David Koppers**

Dear Sir

**SSD 17352813 – Huntingwood processing expansion**

Thank you for your correspondence dated 9 April 2021 requesting our advice in response to the proposed expansion of operations at 65 Huntingwood Drive, Huntingwood which is a State Significant Development proposal under section 4.36 of the *Environmental Planning and Assessment Act 1979*.

The proposal has been reviewed by our officers and we object to the proposal until all issues listed in the Attachment to this letter are addressed and the information required is referred back to Council for reconsideration.

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

Yours faithfully

Glennys James PSM  
Director Planning and Development

**Connect - Create - Celebrate**

Council Chambers - 62 Flushcombe Road - Blacktown NSW 2148

Telephone: (02) 9839 6000 - DX 8117 Blacktown

Email: [council@blacktown.nsw.gov.au](mailto:council@blacktown.nsw.gov.au) - Website: [www.blacktown.nsw.gov.au](http://www.blacktown.nsw.gov.au)

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

# **Blacktown Council's submission to SSD 17352813 – Huntingwood processing expansion**

---

## **1. Planning Issues**

---

- a. The Environmental Impact Statement is to include operational details, including proposed uses in each new building, hours of operation, staff numbers, delivery times, types of trucks to be used, etc.
- b. A Statement of Compliance against the following EPIs is required:
  - Biodiversity Conservation Act 2016
  - Blacktown Local Environmental Plan 2015
  - Part E of Blacktown Development Control Plan 2015
  - State Environmental Planning Policy (Infrastructure) 2007
  - State Environmental Planning Policy (State and Regional Development) 2011
  - State Environmental Planning Policy No. 55 – Remediation of Land
  - State Environmental Planning Policy No. 33 – Hazardous and Offensive Development
  - State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017.
- c. Facades of the proposed structures are to be architecturally treated. Blank walls will not be accepted on facades that address key roads such as Brabham Drive. Details of how the facades will be treated is requested.
- d. Visual relief in the form of varying external finishes, glass curtain walls and mix of hard and soft finishes is required to limit the bulky external appearance of the production facility.
- e. Provide details of external finishes and colours including photomontages.
- f. A comprehensive landscape plan is to be provided to address the bulk and scale of the proposal. This is to include the following details:
  - (i) Dense vegetative screening is to be provided at the north-west splay corner to shield views of the loading bay. It is critical for these components to not detract from the overall appearance of the building.
  - (ii) A vegetated buffer is required fronting Huntingwood Drive to shield views of the proposed silo and production facility.
- g. A survey plan is to be provided indicating existing levels on the subject site and the proposed levels of cut and fill on the site, as no clear levels have been indicated on plans provided. The aerial overview indicates significant level difference in the location of a proposed driveway. The applicant must ensure that all driveway gradients are in accordance with Australian Standards. Also, provide details of any retaining walls including materials of construction.

- h. Further clarification is required regarding truck movements:
  - o Plans do not clearly indicate the direction of traffic flow for trucks entering and exiting the site.
  - o Potential choke point at location of proposed silo (conflict between trucks approaching loading bay area and truck egress out of the subject site). Swept path diagrams are to be provided detailing two-way movement at this intersection.
- i. A comprehensive traffic impact assessment is to be prepared demonstrating sufficient parking is available for the facility. The report is to address the parking requirements of the entire facility against the parking rates detailed within the Blacktown Development Control Plan 2015.
- j. Any signage proposed must be accompanied by an assessment against SEPP 64 and detailed on elevation plans.

## **2. Environmental Health Issues**

---

- a. The EIS has no odour report and does not address the potential odour impacts of the proposal on surrounding development. An odour report or addendum to the EIS is required to address this key issue.

## **3. Engineering Issues**

---

- a. The applicant needs to submit an Engineering Plan to ensure that infrastructure associated with this proposal will be in accordance with Council's Engineering Guide for Development 2005.

## **4. Drainage Issues**

---

- a. On-site Stormwater Detention (OSD)
  - OSD is required for the site. All existing OSD (if any) is to be shown clearly on the survey plan, with discharge control pits and volumes clearly surveyed and located. If there is existing OSD, then the volume and discharge control pits are to be maintained. Where the existing OSD is substantially altered as a result of this proposed development, then Council's current OSD design requirements will apply as follows:
    - o The OSD is to be as per Council's WSUD Standard Drawings and the 'OSD Deemed to Comply Spreadsheet' (latest version available from Council).
    - o Provide an OSD catchment plan and OSD spreadsheet with bypasses (if any).
    - o Refer to Council's WSUD Developer Handbook for further design considerations.
- b. Water Quality

- Either on-lot treatment or a Voluntary Planning Agreement (VPA) is required for the development site.
- On-lot treatment is assessed using Blacktown Council's MUSIC Link. Refer to the WSUD Developer's Handbook for further design requirements.
- Refer Council's DCP 2015 Part J Section 4.2 for pollutant reduction requirements.
- The VPA option enables the developer to enter into an agreement with Council by paying a contribution. The applicable contribution rate is \$62,890 per ha plus an administration fee of 1.5%, and is to be indexed in accordance with Council's policy on the indexing of Section 7.11 contributions. Please contact Catherine.Harris@blacktown.nsw.gov.au for rates and applications. There is no evidence of a VPA being executed by Council with the applicant to date.
- Provide a MUSIC catchment plan and MUSIC model if on-lot water treatment is proposed.
- In addition, where a VPA is entered into, the applicant is to provide details of the proposed gross pollutant trap (GPT) which is required to meet the gross pollutant and total hydrocarbon pollutant retention targets through an oil baffle. The GPT is to be sized to treat 6 month flows which is 75% of 1 yr flow. Use Rational method or DRAINS to calculate the 6 month flow. Details of the calculations are also to be provided.

c. Water Conservation

- Water conservation is required for this development.
- Details of the rainwater tank is required to meet the water conservation targets under Part J for the development. A minimum target of 80% reuse demand is to be achieved.
- Details of the non-potable water demand is to include landscape watering and toilet/urinal flushing.
- Details of the MUSIC model is generally used to assess the performance of the rainwater tank using the node water balance and an electronic copy of the MUSIC model needs to be provided to Council for assessment.
- Refer to WSUD Developers Handbook for further design requirements and usage rates.
- Calculations are to allow for a minimum usage rate of 0.1 kL/day/toilet or urinal and a minimum of 0.4 kL/m<sup>2</sup>/year for landscape watering (excluding turfed areas).
- All calculations (number of toilets etc.)/graphs/catchments and models are to be provided.

d. Submission

- The applicant is to submit engineering concept plans and any electronic modelling/reports undertaken. Furthermore, the applicant is to include Council's

engineering requirements as a summary note on the engineering plans, e.g. OSD required and VPA entered into or not etc. Include design summaries on plans.

## **5. Open Space Issues**

---

- a. An Arboricultural Impact Assessment (AIA) is to be submitted. The proponent should consider measures to retain or rehabilitate any of the existing trees or details of regeneration in lieu of areas where it is not practical to retain trees. Tree replacement at a rate of 2 new trees for each tree removed is recommended.
- b. The AIA is to also identify trees to be removed, retained or transplanted. The AIA is to identify possible impacts on trees to be retained. It is to explain design and construction methods proposed to minimize impacts on retained trees where there is encroachment into the calculated Tree Protection Zone (TPZ). It is to recommend measures necessary to protect the trees throughout all demolition and construction stages. The AIA is to also review architectural, services and landscape plans to provide an accurate impact assessment. Specification of tree protection measures is to be included in construction documentation.
- c. The AIA is to include a tree protection plan (drawing) showing the TPZs for trees being retained. The tree protection plan should be included in subsequent construction documentation. The location of tree protection measures should also be shown on other documents such as demolition, bulk earthworks, construction and landscape plans.
- d. The AIA should detail the condition of the trees on the site or on adjoining sites where such trees may be affected by the proposed works, by assessment of individual specimens or stands.
- e. Provide as an outcome of the visual tree assessment (VTA) the following: a description of the trees, observations made, discussion of the effects the location of the proposed building works may have on the trees or large shrubs and make recommendations required for remedial or other works to the trees or large shrubs, if and where appropriate.
- f. Determine from the AIA and VTA assessments the works or measures required to ameliorate the impact upon the trees to be retained, by the proposed building works or future impacts the trees may have upon the new building works if and where appropriate, or the benefits of removal and replacement if appropriate for the medium to long term safety and amenity of the site.