URBIS

HUNTINGWOOD PROCESSING EXPANSION

Environmental Impact Statement

Prepared for

CHARTER HALL HOLDINGS PTY LTD

14 September 2021

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

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Project Code	P0026451
Report Number	Final

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SIGNED DECLARATION

Project details		
Project name	Huntingwood Processing Expansion	
Application number	SSD-17352813	
Address of the land in respect of which the development application is made	65 Huntingwood Drive, Huntingwood NSW 2148	
Applicant details		
Applicant name	Charter Hall Holdings Pty Ltd	
Applicant address	Level 20, 1 Martin Place, Sydney NSW 2000	
Details of people by whom this EIS was prepared		
Names and professional qualifications	Peter Strudwick Bachelor of Town Planning (UNSW)	Erin Dethridge Bachelor of Urban Planning and Development (UMelb)
Address	Level 8, Angel Place, 123 Pitt Street, Sydney NSW 2000	

Declaration

The undersigned declares that this EIS:

- has been prepared in accordance with Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*;
- contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates;
- does not contain information that is false or misleading;
- addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project;
- identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments;
- has been prepared having regard to the Department's *State Significant Development Guidelines - Preparing an Environmental Impact Statement*;
- contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development;
- contains a consolidated description of the project in a single chapter of the EIS;

▪ contains an accurate summary of the findings of any community engagement; and ▪ contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.		
Signatures	 Peter Strudwick, Director	 Erin Dethridge, Associate Director
Date	14 September 2021	

GLOSSARY AND ABBREVIATIONS

Reference	Description
AHIMS	Aboriginal Heritage Information Management System
AIA	Arboricultural Impact Assessment
Arnott's	Arnott's Biscuits Limited
AEC	Area of Environmental Concern
BAM	Biodiversity Assessment Method
BLEP	*Blacktown Local Environmental Plan 2015*
BDCP	*Blacktown Development Control Plan 2015*
BC Act	*Biodiversity Conservation Act 2016*
BDAR	Biodiversity Development Assessment Report
CBD	Central Business District
CC	Construction Certificate
CMP	Construction Management Plan
Charter Hall	Charter Hall Holdings Pty Ltd
CIV	Capital Investment Value
Council	Blacktown City Council
DCP	Development Control Plan
DGs	Dangerous Goods
District Plan	*Our Greater Sydney: Central City District Plan*
DPIE	NSW Department of Planning, Industry and Environment
DtS	Deemed to Satisfy
DPC	Department of Premier and Cabinet
DSI	Detailed Site Investigation
EESG	Environment, Energy and Science Group
EPA	Environmental Protection Agency
EP&A Act	*Environmental Planning and Assessment Act 1979*

Reference	Description
EP&A Regulations	*Environmental Planning and Assessment Regulation 2000*
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999*
EPIs	Environmental Planning Instruments
EIS	Environmental Impact Statement
ESD	Ecologically Sustainable Development
FTE	Full time equivalent
GANSW	Government Architect NSW
GFSI	Global Food Safety Initiative
GPTs	Gross Pollutant Traps
HACCP	Hazard Analysis Critical Control Plan
HCA	Heritage Conservation Area
HVC	High Voltage Customer Services
IWCM	Integrated Water Cycle Management
ISEPP	*State Environmental Planning Policy (Infrastructure) 2007*
LGA	Local Government Area
NML	Noise Management Levels
OSD	On-Site Detention
PCT	Plant Community Type
Region Plan	*Greater Sydney Region Plan: A Metropolis of Three Cities*
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SEPP 55	*State Environmental Planning Policy No.33 – Hazardous and Offensive Development*
SEPP 55	*State Environmental Planning Policy No. 55 – Remediation of Land*
Site	65 Huntingwood Drive, Huntingwood Lot 1 in DP 866251

Reference	Description
SRD SEPP	*State Environmental Planning Policy (State and Regional Development) 2009*
SQF	Safe Quality Food
SSD	State Significant Development
SSDA	State Significant Development Application
SSI	State Significant Infrastructure
TfNSW	Transport for NSW
TIA	Traffic Impact Assessment
VIA	Visual Impact Assessment
VMP	Vegetation Management Plan
VOC	Volatile Organic Compounds
WMP	Waste Management Plan
WSEA	Western Sydney Employment Area
WSUD	Water Sensitive Urban Design

SUMMARY

This Environmental Impact Statement has been prepared on behalf of Charter Hall Holdings Pty Ltd in support of a State Significant Development (SSD) Application for the site at 65 Huntingwood Drive, Huntingwood.

Charter Hall has identified an opportunity to redevelop the residual land in the north-west corner of its site to allow Arnott's to undertake a major expansion of its manufacturing operations at its Huntingwood site in NSW. The project will significantly expand the project capability and capacity of the current Huntingwood plant.

Specifically, the intended outcomes of the project are to:

- Deliver a state-of-the-art facility to meet future market growth, including export growth
- Provide for the highest and best use of the site through the development of residual land that complements the existing land use.
- Capitalise and leverage the capabilities and infrastructure at the site through the successful integration of the proposed development into the existing facility.
- Minimise disruption to existing operations within the site and surrounding businesses during the construction phase.
- Integrate landscaping and tree planting to ensure a high standard of architectural, urban and landscape design within the Huntingwood Industrial Precinct.

As the proposal is for the purposes of food processing (bakery) with a Capital Investment Value in excess of $30 million, it is SSD by virtue of Clause 3 Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011*.

An aerial photograph of the site detailing the development footprints is provided at **Figure 1**.

Figure 1 Aerial photograph

Source: Urbis

FEASIBLE ALTERNATIVES TO THE PROJECT

Various project alternatives were considered for the required processing facility. A 'do nothing' approach would fail to deliver the necessary production requirements to support and accommodate Arnott's future market growth, including export growth.

A number of alterative locations were also considered by Arnott's to develop the necessary facilities and infrastructure to increase the manufacture of Arnott's products. These options were not considered to be feasible options for the proposal given they would fail to leverage the capabilities of one of the most advanced food manufacturing facilities in Australia. There would be significant additional cost to replicate manufacturing services that have the capacity, with minimal augmentation, to support the new facility.

THE PROPOSAL

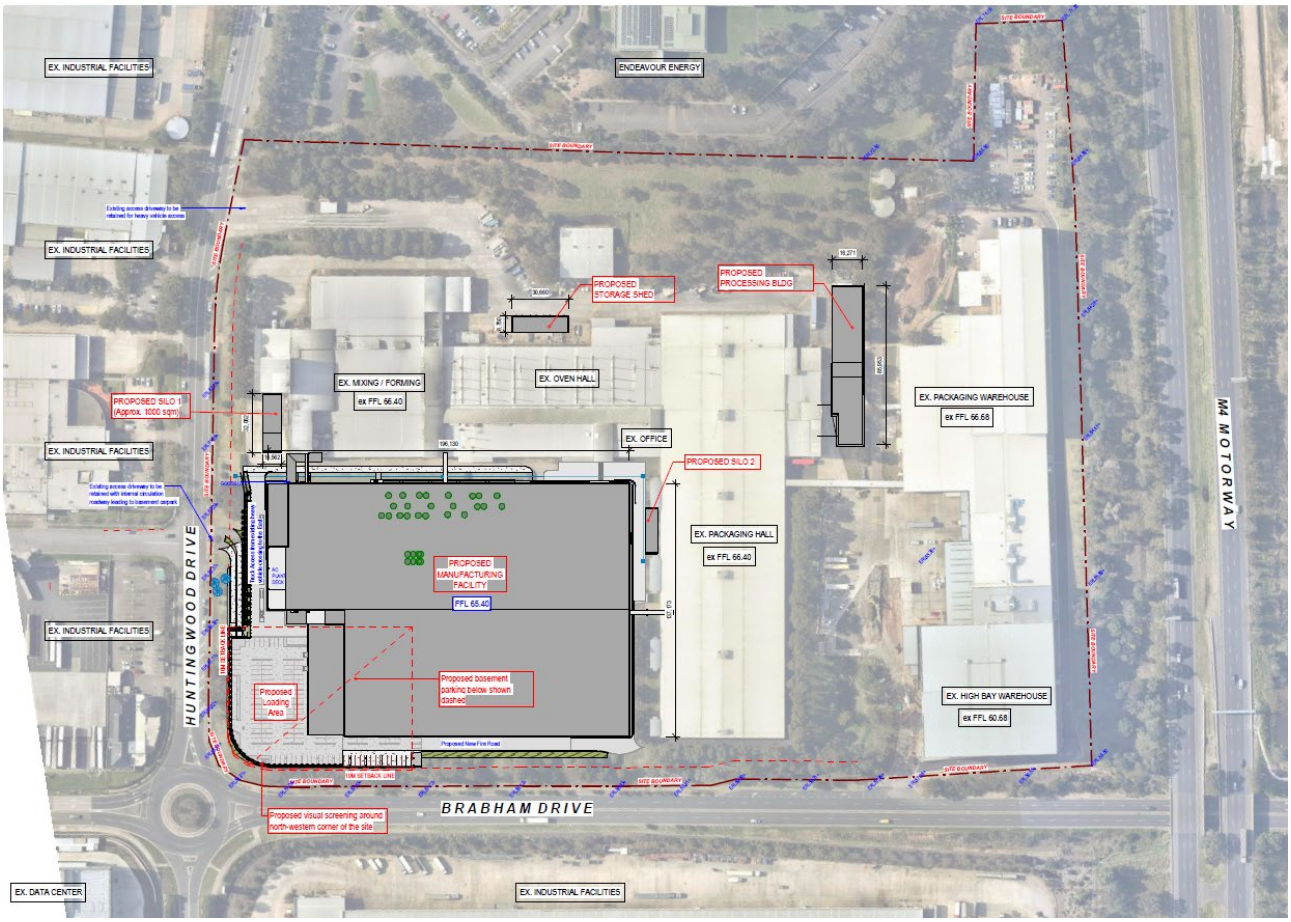
The site was identified as being the most suitable location to deliver the project objectives. It is intended that the proposal will be fully integrated into the existing facility to leverage the existing state-of-the-art capabilities and infrastructure available within the site. This includes the use of existing vehicle access to the site, bulk ingredient silos and on-site maintenance teams. The proposal also provides an opportunity to consolidate manufacturing operations, storage and distribution within one site to reduce transport costs and time, and minimise additional traffic generation.

Broadly, the proposed development involves:

- Construction of a new processing facility in the north west portion of the site of approximately 24,775sqm.
- Construction of ancillary structures including new ingredient silo buildings and storage building.
- New loading area above two levels of parking for 468 cars at the north-west corner of Huntingwood Drive and Brabham Drive.
- Tree removal and landscaping works throughout the site including 265 replacement trees and partial green wall to the car park structure.
- Replacement of the existing on-site detention (OSD) basin with an OSD tank below the basement car park.

The proposal will be undertaken in accordance with the Architectural Plans prepared by HLA Architects at **Appendix B**. The proposed site plan is provided at **Figure 2**:

Figure 2 Proposed site plan



Source: HLA Architects

CONSULTATION

Community and stakeholder engagement has been undertaken by Urbis and the Project Team in the preparation of the SSD Application. This includes direct engagement and consultation with:

- Adjoining landowners and occupants;
- Government, agency and utility stakeholders

The outcomes of the community and stakeholder engagement have been incorporated into the proposed development and are discussed in detail at **Section 5** of this EIS.

JUSTIFICATION OF THE PROJECT

This EIS assesses the development as proposed with regard to relevant planning instruments and policies, and outlines the mitigation measures to ensure the proposed development does not result in unreasonable or adverse environmental effects. Additionally, the proposed development satisfies the Secretary's Environmental Assessment Requirements (SEARs) issued for the project.

The key issues for all components of the project identified in the SEARs have been assessed in detail, with specialist reports underpinning the key findings and recommendations identified in the Assessment of Impacts in **Section 6**. 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.

The proposal represents a positive development outcome for the site and surrounding area for the following reasons:

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

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

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

The proposal satisfies the applicable local and state development controls:

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

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

- The proposed development will expand and leverage the capabilities of one of the most advanced food manufacturing facilities in Australia and provide for the successful integration within existing operations. The proposed development has been located on residual land within the site and ensures the more efficient and effective integration with existing operations with minimal disruption during the construction phase.
- The design and layout utilise the existing vehicle access to the site for both light and heavy vehicles and minimises additional traffic generation through the consolidation of manufacturing operations, storage and distribution within one site.
- Whilst the built form and bulk of the proposed development is largely dictated by the engineering and logistical requirements of the intended purpose, it is entirely consistent with the character of the surrounding Huntingwood Industrial Precinct and will incorporate high-quality materials and finishes.
- The proposal involves significant replacement tree planting of 265 trees to mitigate the loss of planted native vegetation and filter views to and reduce the visibility of the proposed development from the public domain.

The proposal is highly suitable for the site:

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

The proposal is in the public's best interest:

- The proposed development will accommodate up to 229 Full-Time Equivalent (FTE) jobs during the construction phase, and 273 direct FTE jobs once complete and fully operational. The proposal will stimulate local investment and contribute significant economic output and value add to the economy each year.
- The proposal will have no adverse environmental impacts upon residential properties as the site is well separated from residential land. Subject to the various mitigation measures recommended by the specialist consultants, the proposal will not have any unreasonable impacts on adjoining properties or the public domain in terms of traffic, noise and vibration, air quality and odour or views during construction and ongoing operation of the facility.
- Engagement with relevant community, government and agency stakeholders has been undertaken with respect to the proposed development, with no major issues having been raised through the consultation processes.

- It can be concluded that on balance, the benefits of the development outweigh any adverse impacts and as such, the development is in the public interest.

In view of the above, it is considered that this 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 Environmental Impact Statement (EIS) is submitted to the Department of Planning, Industry and Environment (DPIE) in support of a State Significant Development Application (SSDA) for the development of land identified as 65 Huntingwood Drive, Huntingwood (the site).

As the proposal is for the purposes of food processing (bakery) with a Capital Investment Value (CIV) in excess of $30 million, it is State Significant Development (SSD) by virtue of Clause 3 Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* (SEPP SRD).

This EIS has been prepared by Urbis Pty Ltd on behalf of Charter Hall Holdings Pty Ltd (Charter Hall) and is based on the Architectural Plans prepared by HLA Architects and other supporting technical documentation appended to the report.

The EIS has been prepared in accordance with the requirements of Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) and the relevant Secretary's Environmental Assessment Requirements (SEARs), which have been included at **Appendix A**. This EIS should be read in conjunction with the supporting information and plans accompanying the report.

1.1. APPLICANT DETAILS

Applicant details for the SSDA are identified in **Table 1**.

Table 1 Applicant details

Descriptor	Proponent Details
Company	Charter Hall Holdings Pty Ltd
Postal Address	Level 20, 1 Martin Place, Sydney NSW 2000
ABN	15 051 363 547
Nominated Contact	Matthew Cox, National Delivery Manager - Industrial & Logistics

1.2. PROJECT OBJECTIVES

Charter Hall has identified an opportunity to expand their existing operations within the site and redevelop the residual land in the north-west corner. The site has been occupied by Arnott's Biscuits Limited (Arnott's) for the last 26 years and the existing operations within the 16.4ha site include the manufacture, storage and distribution of Arnott's products.

Arnott's is proposing to undertake a major expansion of its manufacturing operations at its Huntingwood site in NSW. The project will significantly expand the project capability and capacity of the current Huntingwood plant

On this basis, the key objectives of the proposal are to:

- Deliver a state-of-the-art facility to meet future market growth, including export growth.
- Provide for the highest and best use of the site through the development of residual land that complements the existing land use.
- Capitalise and leverage the capabilities and infrastructure at the site through the successful integration of the proposed development into the existing facility.
- Minimise disruption to existing operations within the site and surrounding businesses during the construction phase.

- Integrate landscaping and tree planting to ensure a high standard of architectural, urban and landscape design within the Huntingwood Industrial Precinct.

1.3. OVERVIEW OF PROPOSED DEVELOPMENT

The SSDA seeks approval for the following development:

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

1.4. PROJECT BACKGROUND

1.4.1. Analysis of Feasible Alternatives

Three options were considered in respect of the proposal as outlined in **Table 2**.

Table 2 Project alternatives

Option	Analysis
Do Nothing	A ‘do nothing’ approach would fail to deliver the necessary production requirements to support and accommodate Arnott’s future market growth, including export growth. Doing nothing would also prevent the development of residual land within the site for its highest and best use, and fail to contribute towards the provision of additional jobs within the Huntingwood Industrial Precinct.
Alternative location	A number of alterative locations were considered by Arnott’s to develop the necessary facilities and infrastructure to increase the manufacture of Arnott’s products. This included a greenfield site in Western Sydney and expanding manufacturing on another Arnott’s site. These options were not considered to be feasible options for the proposal given:

Option	Analysis
	▪ The sites would fail to leverage the capabilities of one of the most advanced food manufacturing facilities in Australia. ▪ There would be significant additional cost to replicate manufacturing services that have the capacity, with minimal augmentation, to support the new facility. ▪ An alternate site would introduce more transport for shuttling finished goods back to the recently expanded and automated warehousing at the southern end of the site.
The proposal (preferred option)	The site was identified as being the most suitable location to expand Arnott's manufacturing operations and presents the most strategically viable of the options for the following reasons: ▪ The proposal promotes the efficient use of residual land within the site, which is capable of being developed. ▪ It is intended that the proposal will be fully integrated into the existing facility to leverage the existing state-of-the-art capabilities and infrastructure available within the site. This includes the use of existing vehicle access to the site, bulk ingredient silos and on-site maintenance teams. ▪ The proposal consolidates manufacturing operations, storage and distribution within one site to reduce transport costs and time, and minimise additional traffic generation.

1.5. DESCRIPTION OF RELATED DEVELOPMENT

To understand the history of the site, **Table 3** provides detail of the development consents that have been granted by Council.

Table 3 Existing consents that apply to the site

Application	Description	Approval Date
DA 50/94	This consent is the earliest record of development on the site and allowed the construction of a new biscuit factory and associated offices, extension to warehouse docks and a wastewater treatment plant.	27 February 1995
DA-88-0839D	Approval for the construction of a warehouse and distribution centre.	9 March 1989
DA-96-0120D	Minor workshop building addition associated with the Arnott's Biscuits manufacturing and warehouse distribution facility.	22 April 1996

Application	Description	Approval Date
DA-18-00883 MOD-190039 MOD-19-00072	The partial demolition and extension of the existing warehouse along the southern boundary, construction of a high bay warehouse to be used for storage with a height of approximately 50m, construction of a new perimeter access road to allow for access to the existing car park facilities, upgrade of loading docks, construction of a small shed to accommodate two heritage Arnott's trucks and site landscaping and associated works. A modification was approved on 14 March 2019 to correct minor errors in the conditions of consent. A major modification was approved on 28 March 2019 to allow a reduction to the building height of the high-bay warehouse, installation of rooftop mechanical ventilation, increased accessibility measures, amended stormwater and civil works. Copies of the development consent and approved modifications are provided at **Appendix H**. The development consent does not include any restrictions on production quantities and number of heavy vehicle movements. This development was completed and became operational at the end of 2020.	24 December 2018 Modified 14 March 2019 and 28 March 2019

2. STRATEGIC CONTEXT

This section of the EIS describes the way in which the proposal addresses the strategic planning policies relevant to the site. It identifies the key strategic issues relevant to the assessment and evaluation of the project, each of which are further addressed in **Section 7** of this EIS.

2.1. RELEVANT GOVERNMENT STRATEGIES AND POLICIES

2.1.1. Greater Sydney Region Plan: A Metropolis of Three Cities

The *Greater Sydney Region Plan* (Region Plan) provides the overarching strategic plan for growth and change in Sydney. It is a 20-year plan with a 40-year vision that seeks to transform Greater Sydney into a metropolis of three cities. The site is located within the Central City District.

The proposal is consistent with the relevant objectives of the Region Plan:

- *Objective 14 – Integrated land use and transport creates walkable and 30-minute cities*

  The proposal will deliver increased job opportunities within an established industrial precinct to cater to the increased population projections. Additionally, the proposal can take advantage of bus services available along Brabham Drive and Huntingwood Drive, which provide public transport connections to Blacktown Station.

- *Objective 23 – Industrial and urban services land is planned, retained and managed*

  Manufacturing is the most dominant non-urban services industry in the Central City District which supports the city's productivity and integrated economy. The proposal will deliver an additional 43,625sqm of industrial floor space, which will support the retention and management of industrial land within Greater Sydney. The expansion will also leverage the capabilities of the existing facility and generate an additional 273 direct jobs.

- *Objective 33 – A low-carbon city contributes to net-zero emissions by 2050 and mitigates climate change*

  The proposal will include a range of sustainability measures to improve the energy efficiency as outlined in Section 6.8 and the ESD Report at **Appendix T**. The proposal aims to minimise the use of fossil fuels in line with Arnott's commitment to achieve net-zero emissions in their operations by 2040, and across the value chain by 2050. This will be supported by a transition plan and power purchase agreements, resulting in an elimination of Greenhouse Gas Emissions from the facility 10 years ahead of the Government's goal of net zero emissions by 2050.

2.1.2. Our Greater Sydney 2056: Central City District Plan

The *Central City District Plan* (District Plan) sets out the planning priorities and actions to manage growth and change in the Central City District. Given that it is a guide for implementing at a local level the directions of the Region Plan, there are substantial similarities in the relevant objectives. As a result, the objectives identified in Section 2.1.1 translate into the achievement of the following planning priorities under the District Plan:

- *Planning Priority N9 – Delivering integrated land use and transport planning and a 30-minute city*
- *Planning Priority N10 – Growing Investment, business opportunities and jobs in strategic centres*
- *Planning Priority N11 – Maximising opportunities to attract advanced manufacturing and innovation in industrial and urban services land*
- *Planning Priority N19 – Reducing carbon emissions and managing energy, water and waste efficiently*

2.1.3. Future Transport Strategy 2056

The *Future Transport Strategy 2056* establishes a vision and strategy for managing the growth of transport services and infrastructure in NSW over the next 40 years. Developed alongside the Region Plan, it seeks to

provide an integrated planning framework for NSW that supports the repositioning of Sydney as a metropolis of three cities.

The proposal is consistent with the strategy as it involves the consolidation of manufacturing operations, storage and distribution within one site to minimise additional traffic generation on the local road system. The proposal will also leverage the site's excellent connections to key freight networks and includes bicycle parking and end of trip facilities to encourage sustainable forms of transport.

2.1.4. Better Placed

In August 2017, the Government Architect for NSW (GANSW) released *Better Placed*, the integrated design policy for NSW. Better Placed seeks to establish priorities and objectives that shape design to create well-designed built environments.

It presents a collection of priorities and objectives that aspire to shape design that addresses key challenges and directions and creates good design outcomes for NSW. The proposed development is consistent with the objectives given it will:

- Be readily absorbed into the industrial context and character of the surrounding area (Objective 1).
- Incorporate sustainability measures to improve the environmental performance of the building (Objective 2).
- Capable of complying with relevant accessibility provisions to ensure equitable access (Objective 3).
- Fit for purpose in response to engineering and logistical requirements (Objective 5).
- Contribute significant economic output and value add to the economy each year (Objective 6).
- Incorporate architectural treatments and screen planting to soften views towards the development (Objective 7)

By adopting the objectives of the Better Placed policy, development responds to the key challenges and directions for NSW.

2.2. KEY FEATURES OF SITE AND SURROUNDS

2.2.1. Site Description

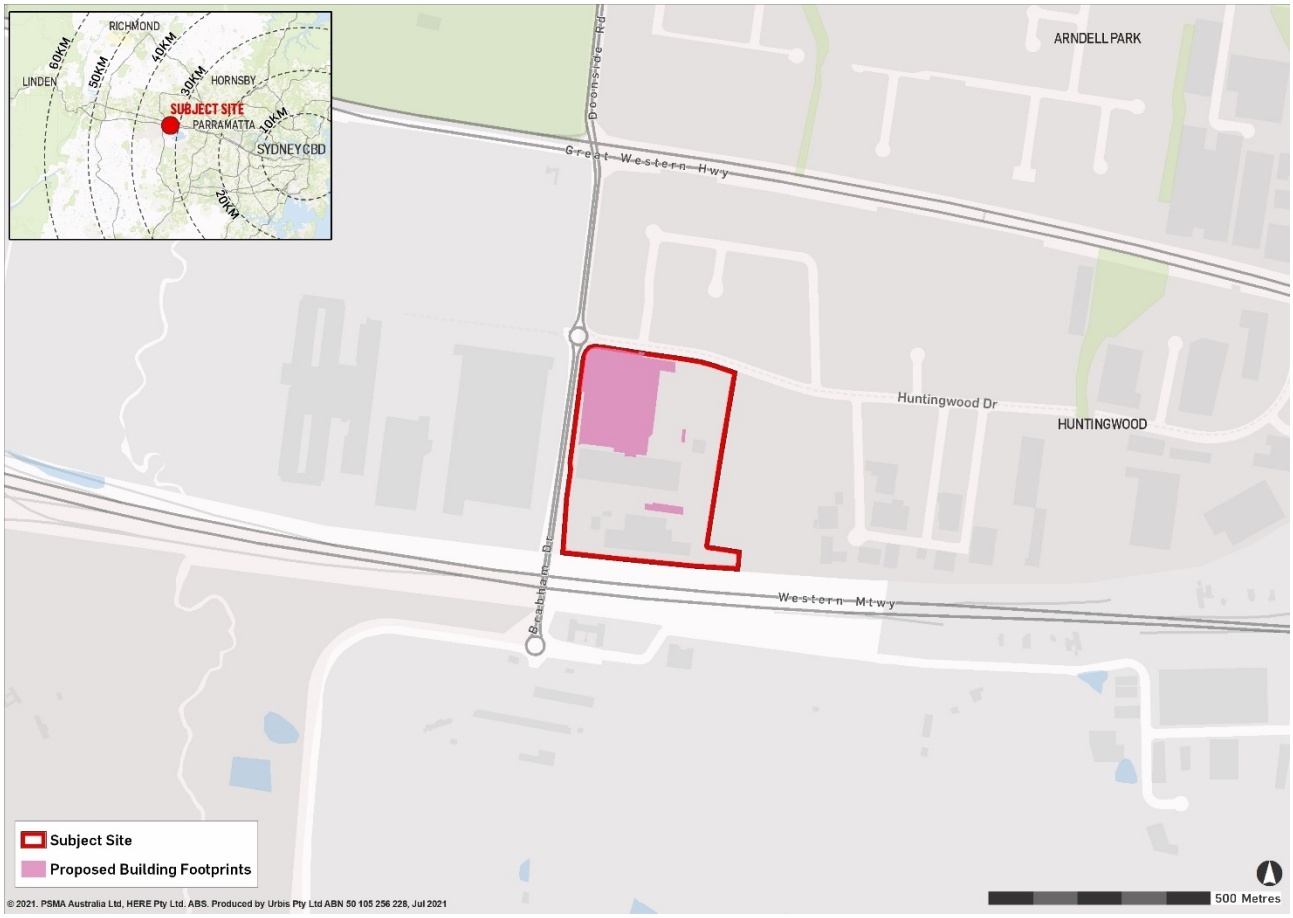
The site is located at 65 Huntingwood Drive, Huntingwood and is within the Blacktown Local Government Area (LGA). The site is legally described as Lot 1 in DP 866251. The large site occupies a long broadly rectangular allotment bounded to the north by Huntingwood Drive, west by Brabham Drive and to the south by the M4 Motorway (refer **Figure 3**).

The site is currently used by Arnott's Biscuits as a food processing (bakery) facility which operates 24 hours a day, seven days a week. The site is approximately 16.4 ha in area and is characterised by three large freestanding industrial buildings, being the processing facility and two warehouses, which are surrounded by ancillary structures, privately used open space, vegetation, car parking and loading areas.

The main processing building is broadly massed along the eastern boundary and forms a reverse 'L' shaped floorplate. The buildings vary in height and form but share similar industrial characteristics in terms of their simple massing, cladding materials and roof forms. The two warehouses are located in the southern portion of the site and include the recently constructed high-bay warehouse, which is approximately 50m in height.

Photographs of the current site condition are provided in **Figure 4**.

Figure 3 Location plan



Source: Six Maps

Figure 4 Site photographs

Picture 1 Existing heavy vehicle access in north-eastern corner of site from Huntingwood Drive

Picture 2 Existing light vehicle access from Huntingwood Drive

Picture 3 View to the north-western corner of site

Source: Urbis

Picture 4 High-bay warehouse in south-western corner of the site viewed from Brabham Drive

The following **Table 4** provides an overview of the key site features and characteristics.

Table 4 Summary of site features and characteristics

Issue	**Key features and Characteristics**
Topography	The site is reasonably flat with a gentle east (RL66.09) to west crossfall (RL59.12). The north-western edge of the site is elevated 4m above the surrounding road reserves. East of the main driveway, topography is characterised by even sloping batters ranging in height from 1m to 3.5m and manicured lawn areas below a relatively level platform.
Vegetation	The existing site is heavily landscaped, with mature trees lining the existing driveway and circling the open space in the north-west corner, which currently functions as an OSD detention basin (refer **Figure 5**). The site is not mapped under the NSW Government Biodiversity Values Map. Figure 5 Planted vegetation surrounding western entrance to site  *Source: Eco Logical*

Issue	Key features and Characteristics
Existing Road Networks	Huntingwood Drive is a major collector road, which provides one traffic lane and one parking lane in each direction. Huntingwood Drive intersects Brabham Drive at a roundabout adjacent to the Arnott's site. Brabham Drive is a sub-arterial road that provides access into Huntingwood from the Greater Western Highway to the north of the site. It provides for two traffic lanes in each direction, with a central median. The M4 is located to the south of the site and the closest access point from the site is the Reservoir Road on/off-ramps via the Great Western Highway.
Access and Parking	Vehicular access to the site is via an existing entry and exit driveway (Liberty Road) at the Huntingwood Drive frontage. Access is also available from Brabham Drive to the car parking associated with the high-bay warehouse in the southern portion of the site. A total of 260 car spaces are currently accommodated within the site. Separate heavy vehicle access to the site is available from Huntingwood Drive adjacent to the eastern boundary. Heavy vehicle access to the high-bay warehouse is also available from Brabham Drive.
Public Transport	There are two bus stops located out the front and adjacent to the site on Huntingwood Drive and one bus stop located adjacent to the site on Brabham Drive. The stops located on Huntingwood Drive are serviced by the 723 while the stop located on Brabham Drive is serviced by the 724. The details of these routes are listed below: ▪ 723 – Mount Druitt to Blacktown via Eastern Creek (running every 20 minutes). ▪ 724 – Blacktown to Arndell Park via Huntingwood (loop service running every 30 minutes). These services provide connections to other key public transport nodes such as Blacktown, Rooty Hill and Mount Druitt. These locations provide both rail and bus connections to Macquarie Park, Rouse Hill, Parramatta, Penrith, Liverpool and the Sydney CBD.
Hydrology and Flooding	The site is not identified as flood prone land under the Blacktown Flood Prone Land Map. The north-western corner of the site currently acts as an OSD basin.
Ground Water	Groundwater levels have been measured in the wells installed within the previous geotechnical investigations and it was found that no groundwater seepage was encountered during or on completion of drilling of both the boreholes drilled in the 1990s and the current boreholes to a depth of 6m.
Bushfire	The site is not identified as bushfire prone under the Blacktown Bushfire Prone Land Map.
Heritage	The site does not contain any heritage items and is not located in a heritage conservation area (HCA) under Schedule 5 of the Blacktown Local Environmental Plan 2015 (BLEP). There are no heritage items within the immediate vicinity of the site.

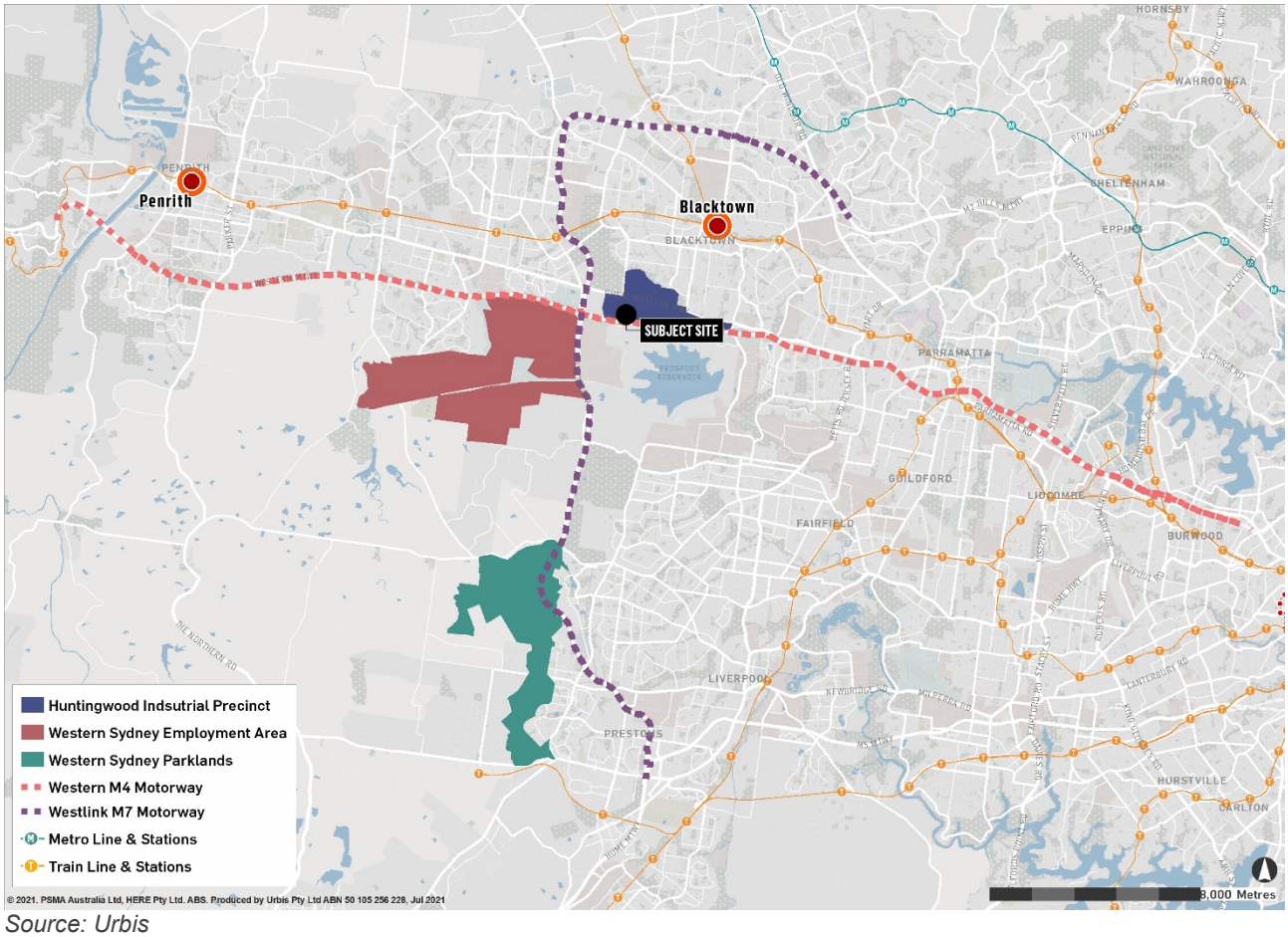
Issue	Key features and Characteristics
Services	The site currently contains and is connected to all necessary services including electricity, water, drainage and sewage. Required, relocation, upgrades and augmentation of these services and infrastructure will occur as required subject to detailed design and construction.

2.2.2. Site Context and Surrounding Development

The site is 32km west of the Sydney Central Business District (CBD) and 4km south of Blacktown Town Centre.

Situated on a corner site within the Huntingwood Industrial Precinct, the site enjoys frontages to both Huntingwood Drive and Brabham Drive which provide convenient access to significant freight corridors including the Great Western Highway, Westlink M7 Motorway, and the Western M4 Motorway. These motorways and major roads provide access to west, north-west and south-west Sydney, the M5 South Western Motorway, the Western Sydney Employment Area (WSEA), the Sydney CBD via the City West Link, the future Western Sydney Airport and Aerotropolis, and other major centres such as Penrith. The regional context is shown in **Figure 6**.

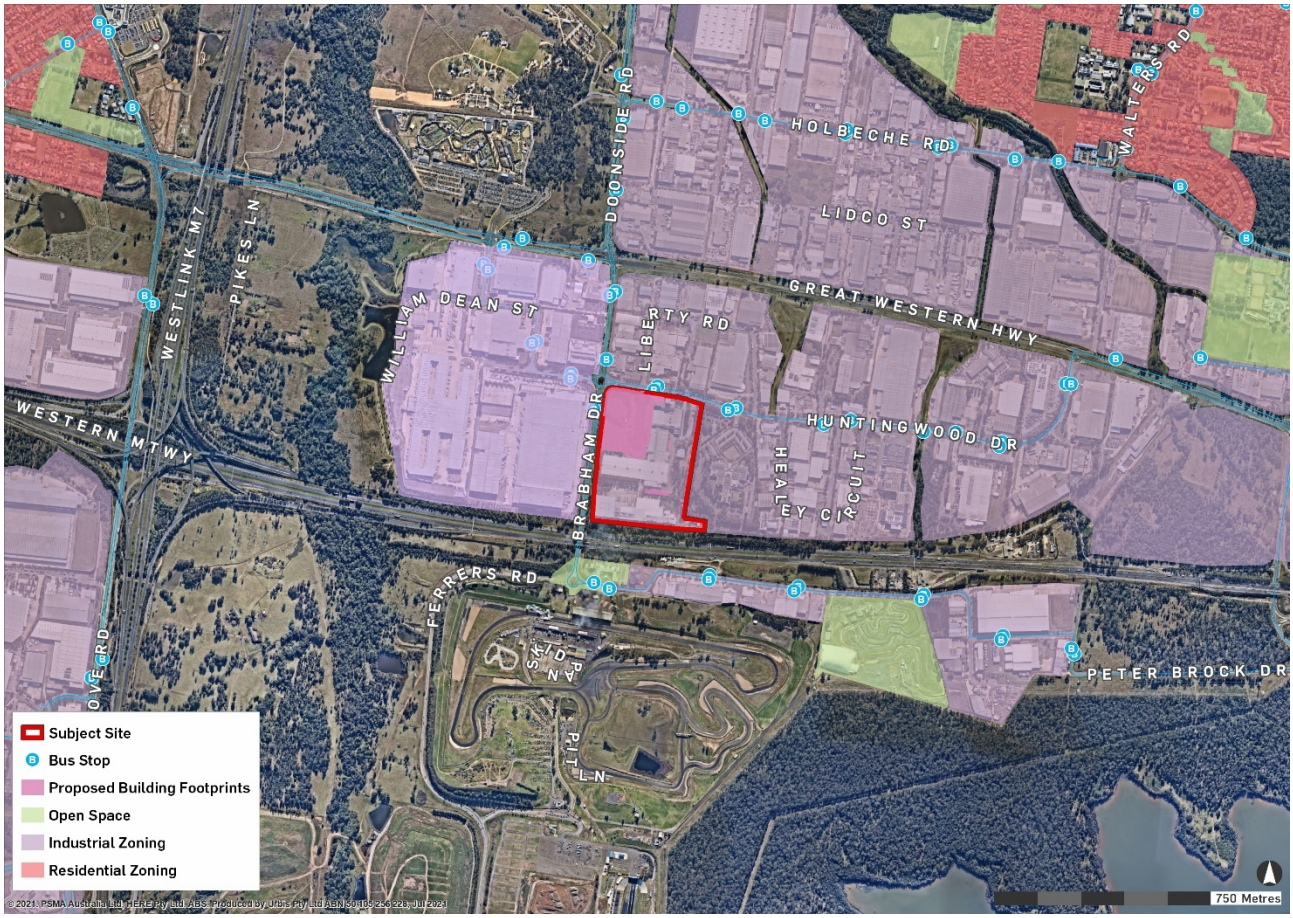
Figure 6 Regional context plan



Source: Urbis

A mix of small, medium and large scale industrial uses are situated immediately north and east of the site, within the Huntingwood Industrial Precinct, while Western Sydney Parklands are located to the south and west (refer **Figure 7**).

Figure 7 Local context plan



Source: Urbis

The area immediately surrounding the site is characterised by*:*

- **North:** Opposite the site on the north-west corner of Huntingwood Drive and Brabham Drive is a tall bulky data centre. This building is a rectangular mass clad in contemporary materials and has an approximate height equivalent to 5 to 6 residential storeys. The building is set close to both road frontages and is surrounded by minimal ornamental planting.
- **East:** The adjoining site is occupied by Endeavour Energy and comprises a large parcel of land with a single building located at the south end of the site leaving the northern half largely free of built form and predominantly characterised by a heavily treed landscape. Further east are several light industrial warehouses and data centres.
- **South:** The site is bounded to the south by the M4 Motorway, consisting of a three-lane dual carriageway. Further south is the Eastern Creek Raceway and entertainment precinct and includes a hotel, raceway and commercial land uses.
- **West:** Across Braham Drive to the west is the Bungarribee Industrial Estate owned by Goodman. This estate includes two buildings, the eastern one comprising a long continuous pitched-roof warehouse that is simply massed and measuring approximately 400m in length and 200m in width. The building is surrounded only by a narrow margin of hardstanding for vehicle access and strip planting along its eastern boundary.
- The adjoining site west of Bungarribee Industrial Estate is occupied by TOLL and is also characterised by one long continuous built form of approximately 420m in length and equivalent to 3 to 4 residential storeys in height. This site is devoid of any visually significant planting or mature trees.

- Low density residential uses and the Blacktown CBD are situated further north-east of the subject site, with additional industrial uses located further west in Eastern Creek and Erskine Park, and south in Wetherill Park.

Photographs of the surrounding land uses are provided as **Figure 8**.

Figure 8 Locality photographs

Picture 5 View south-west to Endeavor Energy site from Huntingwood Drive

Picture 6 View west along Huntingwood Drive

Picture 7 View of DHL warehouse on northern side of Huntingwood Drive

Picture 8 View of data centre on north-west corner of Huntingwood Drive and Brabham Drive

Source: Urbis

2.3. CUMULATIVE IMPACTS

The proposal is located within the established industrial area of Huntingwood and at the time of preparing the EIS, there were no other development applications (local or SSD) or State Significant Infrastructure (SSI) projects proposed or under construction in the immediate vicinity of the site.

Given the proposed intensity of development within the site, cumulative impacts have been considered with particular regard to traffic generation during construction and operation, and additional noise and air emissions. Cumulative impacts are considered in the assessment of key impacts at **Section 6**.

2.4. PLANNING AGREEMENTS

Charter Hall does not intend to enter into a Voluntary Planning Agreement (VPA) with Blacktown City Council for integrated water management as outlined in Council's correspondence dated 11 May 2021, which accompanied the SEARs. As discussed in **Section 3.2.3.2**, a stormwater management system is proposed within the site and includes several pollution treatment devices.

3. PROJECT DESCRIPTION

The following sections of the EIS summarise the key numeric components of the project and describe the demolition, site preparation, construction and operational phases in further detail.

3.1. PROJECT OVERVIEW

The proposal involves the development of the site at 65 Huntingwood Drive, Huntingwood to accommodate an expansion of the existing food processing facility.

An overview of the proposed development is outlined in **Table 5** and a photomontage from the Huntingwood Drive frontage is shown in **Figure 9**. Architectural Plans of the proposed development prepared by HLA Architects are provided in **Appendix B**.

Table 5 Overview of proposed development

Element	Project Details
Project site area	Development footprint: 1.34ha Extent of basement excavation: 7,217sqm
Site description	Lot 1 in DP 866251
Land use	General industrial comprising food processing (bakery)
Building area	Existing: 52,089sqm Proposed: 43,625sqm Total: 93,731sqm
Building height	Processing building: 14.6m above loading dock Ingredient silo: 29.32m (approx.) Loading dock and car park structure: 9.07m
Access	No changes are proposed to the existing vehicle access points to the site. Light vehicles – existing westernmost access from Huntingwood Drive which will connect to the basement access ramp to the new car park. Heavy vehicles – existing easternmost access from Huntingwood Drive.
Car parking	Proposed 468 car parking spaces accessed from Huntingwood Drive. Existing 95 car spaces access from Brabham Drive to be retained. Proposed 6 motorcycle parking spaces.
Bicycle parking	Proposed 10 bicycle spaces
Timing	Construction estimated to commence early 2022 for approximately 18-20 months.
Jobs	Construction: 91 direct and 138 indirect construction jobs

Element	Project Details
	Operation: 273 new direct jobs (Total including existing: 633 jobs) and a further 431 indirect jobs from flow-on effects
Construction hours	Standard hours of construction: ▪ 7.00am to 5.00pm on Monday to Friday; and ▪ 8.00am to 1.00pm on Saturday. ▪ No work on Sundays and Public Holidays
Hours of Operation	24 hours per day, seven days per week
Capital Investment Value	$115,930,775

Figure 9 Proposed view of development from Huntingwood Drive

Source: Urbis

3.2. DETAILED DESCRIPTION

3.2.1. Project Area

The proposed development is largely contained within the north-western corner of the site, with the exception of two smaller areas to the east and south of the existing processing building. The construction and operational footprints for the proposal are shown in **Figure 10**.

The proposal requires the removal of 260 native trees from within the site. The site consists entirely of planted native vegetation and does not contain remnant ecological communities or threatened ecological communities.

Figure 10 Construction and operational footprints

Source: Eco Logical

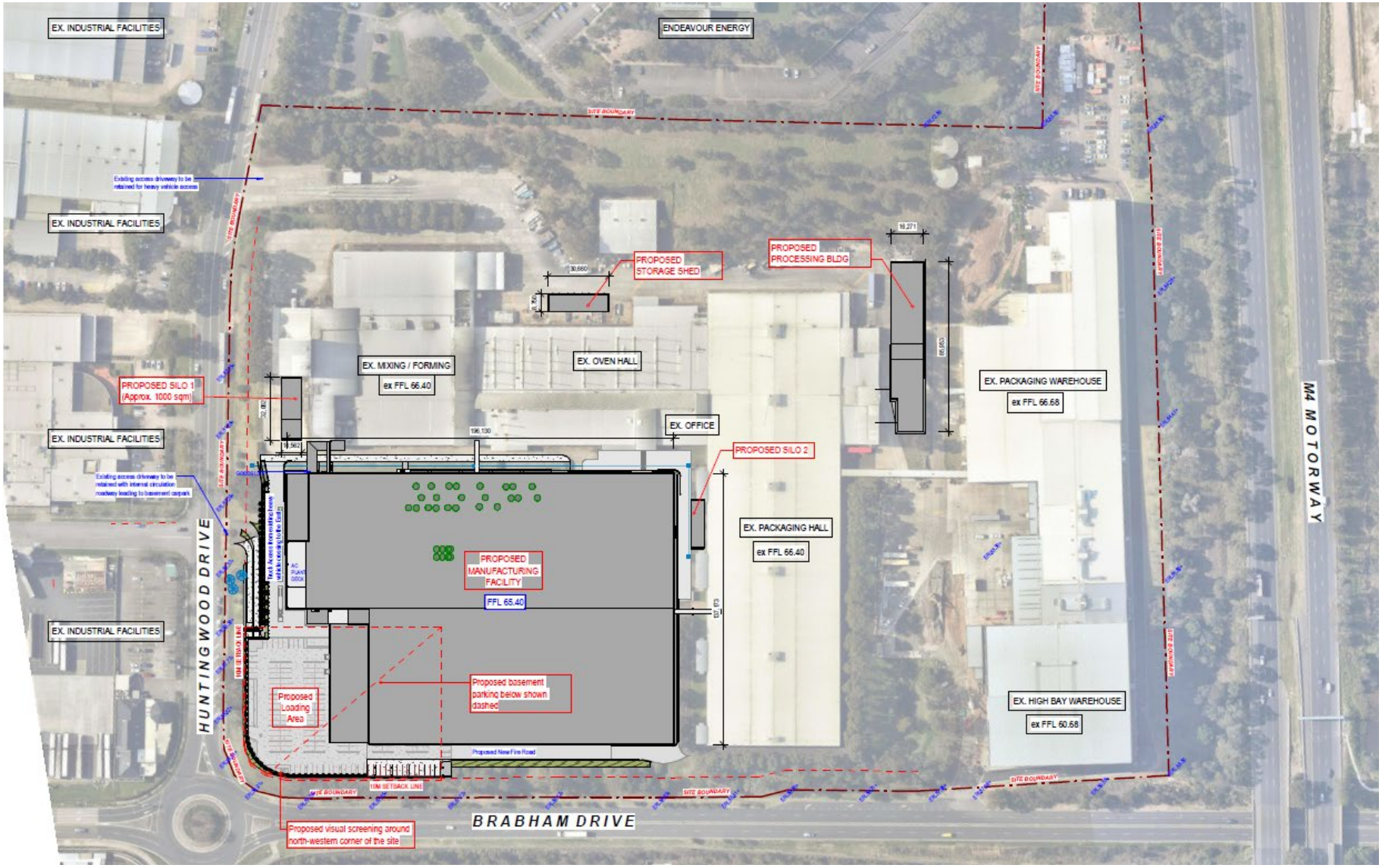
3.2.2. Physical Layout and Site Design

3.2.2.1. Site Layout

The proposed site layout takes into consideration the existing site conditions, and is largely driven by the functional requirements pertaining to the operation of the existing Arnott's facility. As shown in **Figure 11**, the proposal will involve:

- Construction of a new processing facility (24,775sqm) to the west of the existing processing building. The northern end of the building incorporates a first floor for staff amenities and meeting rooms, and second floor to accommodate plant areas.
- Construction of new ingredient silo building (1,000sqm) along the Huntingwood Drive frontage.
- Construction of a storage building (270sqm) to the east of the existing processing building.
- Construction of a new processing building (1,200sqm) to the south of the existing facility and ingredient silo building (120sqm) to the south of the main facility.
- New loading area above two levels of car parking (468 spaces) at the north-west corner of Huntingwood Drive and Brabham Drive.
- The existing on-site detention (OSD) basin will be replaced with an OSD tank below the basement car park.
- Landscaping works throughout the site including 265 replacement trees and partial green wall to the car park structure.

Figure 11 Proposed site plan



Source: HLA Architects

3.2.2.2. Design and Built Form

As is the case with most industrial type buildings, the built form and bulk of the proposed development is largely dictated by the engineering and logistical requirements of the intended purpose. In this case, the scale and form of the main processing facility has been determined by the production lines and technology, and the required connections to the existing processing building. The location of the proposed facility above the car park also responds to the required levels needed to ensure the successful integration of the existing and proposed facilities.

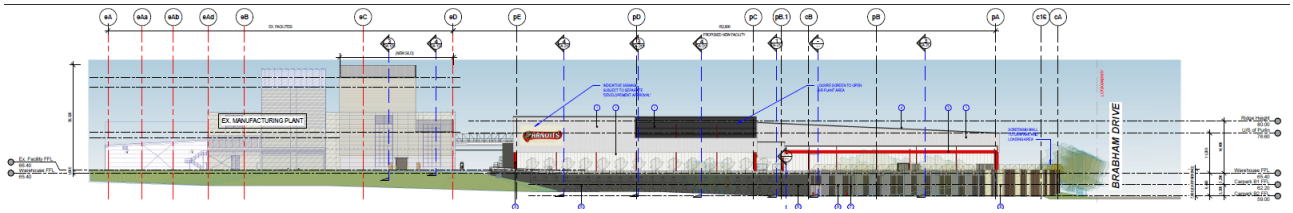
The new processing building will have a maximum height of 14.6m above the new loading dock and will be constructed of colorbond metal cladding in a variety of colour finishes and a zincalume roof. The length of the facades will be further broken up by vertical red accents and the use of glazed window sections along the Brabham Drive frontage. Louvres will be applied to screen the open-air plant along the Huntingwood Drive frontage. Elevations of the processing building are shown in **Figure 12**.

The car park and loading structure will be set back 10m from the Huntingwood and Brabham Drive frontages and will have a maximum height of 9.07m. The external faces include a combination of perforated metal screens and battens in a timber finish and will be established as a partial green wall to provide visual relief.

The new silo building will sit alongside the existing silos in this location and will be of similar proportions and finishes with a maximum height of approximately 29.32m.

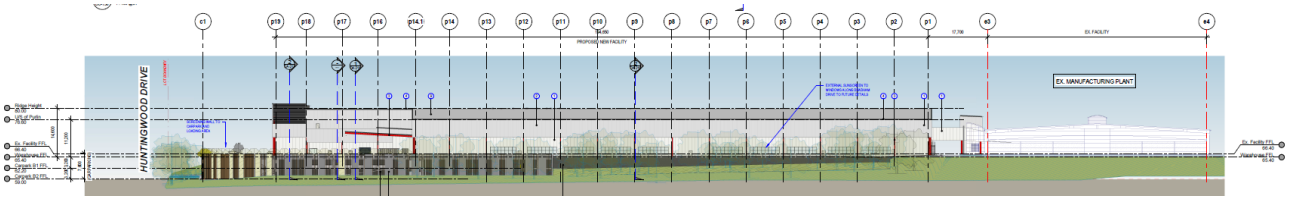
The ancillary structures including the storage building, smaller processing building and ingredient silos will not be visible from the surrounding streets. These structures will be finished in similar materials to the new processing facility to provide cohesion across the site.

Figure 12 Proposed northern elevation (Huntingwood Drive)



Source: HLA Architects

Figure 13 Proposed western elevation (Brabham Drive)



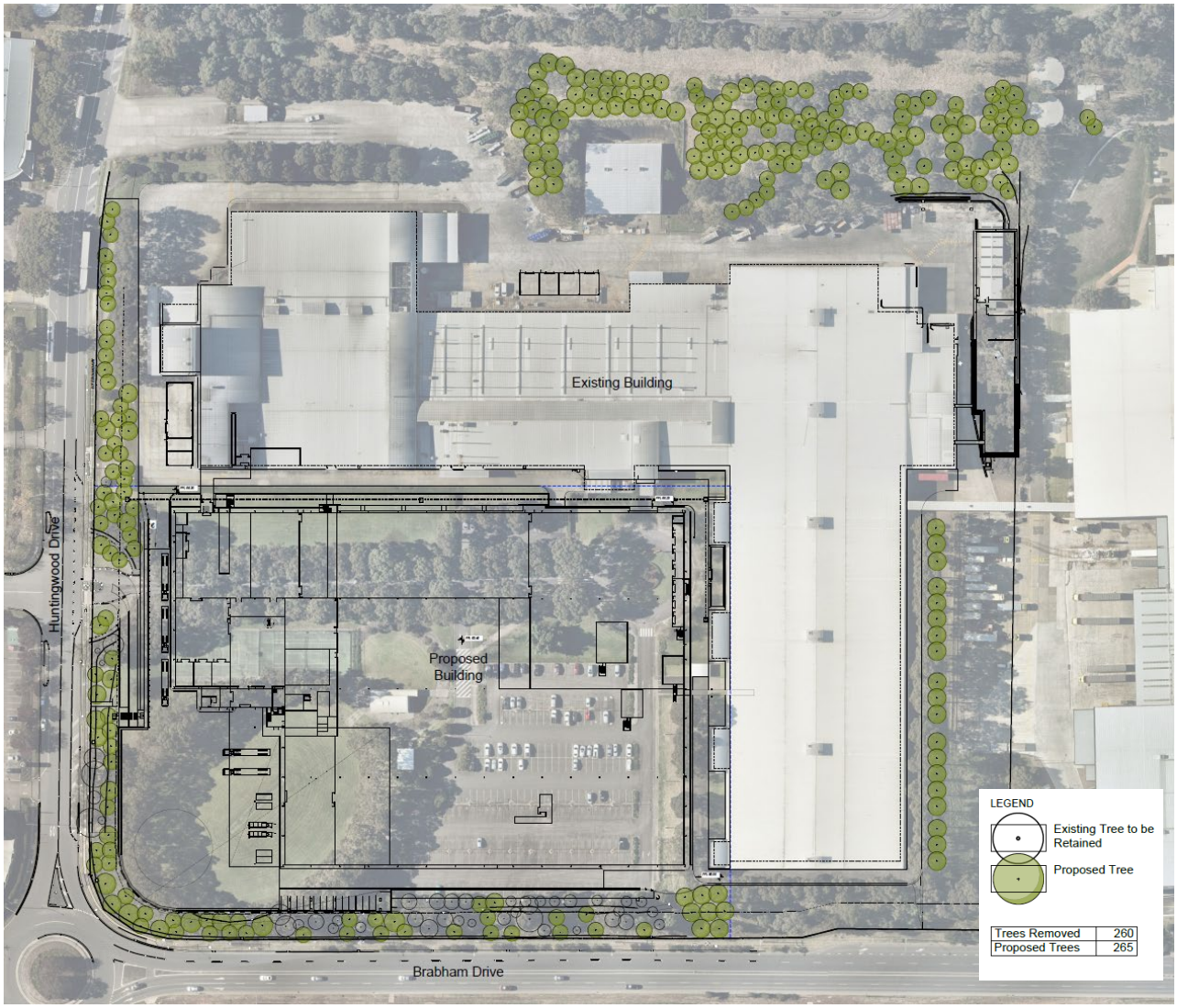
Source: HLA Architects

3.2.2.3. Landscaping and Planting

Landscaping works will be undertaken in accordance with the Landscape Plans prepared by Site Image and provided at **Appendix F**.

Correspondence from the Environment, Energy and Science Group (EESG) of DPIE and Council recommended replacement tree planting at a ratio of 2:1. A thorough review of available space across the entire site for new tree planting was undertaken by the Project Team. This review indicated that it was only feasible to accommodate 265 new trees as shown in **Figure 14**, which equates to ratio of 1:1. The tree planting will include species from the Cumberland Plain community such as *Eucalyptus crebra, Eucalyptus eugenioides, Eucalyptus fibrosa, Eucalyptus maculate, Eucalyptus moluccana, and Eucalyptus tereticornis.*

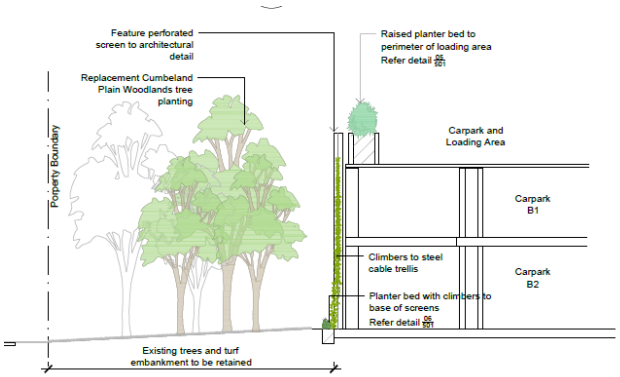
Figure 14 Proposed tree planting



Source: Site Image

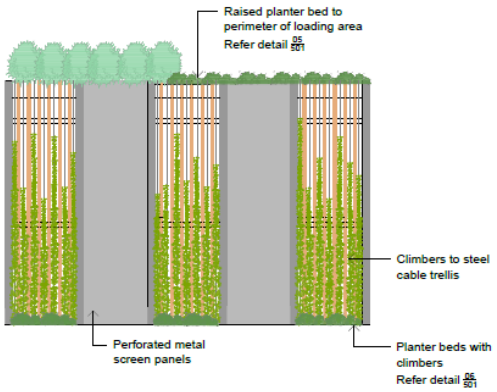
As highlighted previously, the car park and loading structure will feature perforated metal screens, timber battens and sections of green wall around the north-west corner to soften views and provide visual relief. A raised screening planter will also sit around the perimeter of the loading dock. Details of the green wall and raised planter are shown in **Figure 15**. Terraced planting and retaining walls are proposed along t he basement access ramp to manage the change in levels in this location.

Figure 15 Landscaped screening to car park and loading dock



Picture 9 Section detail

Source: Urbis



Picture 10 Elevation detail

Source: Urbis

3.2.3. Uses and Activities

The on-site activities associated with the proposal will be similar to those currently undertaken at the site and include:

Raw materials delivery and storage

- Production and baking of biscuits and crackers
- Product packaging
- Dispatch and distribution
- Ancillary office administration

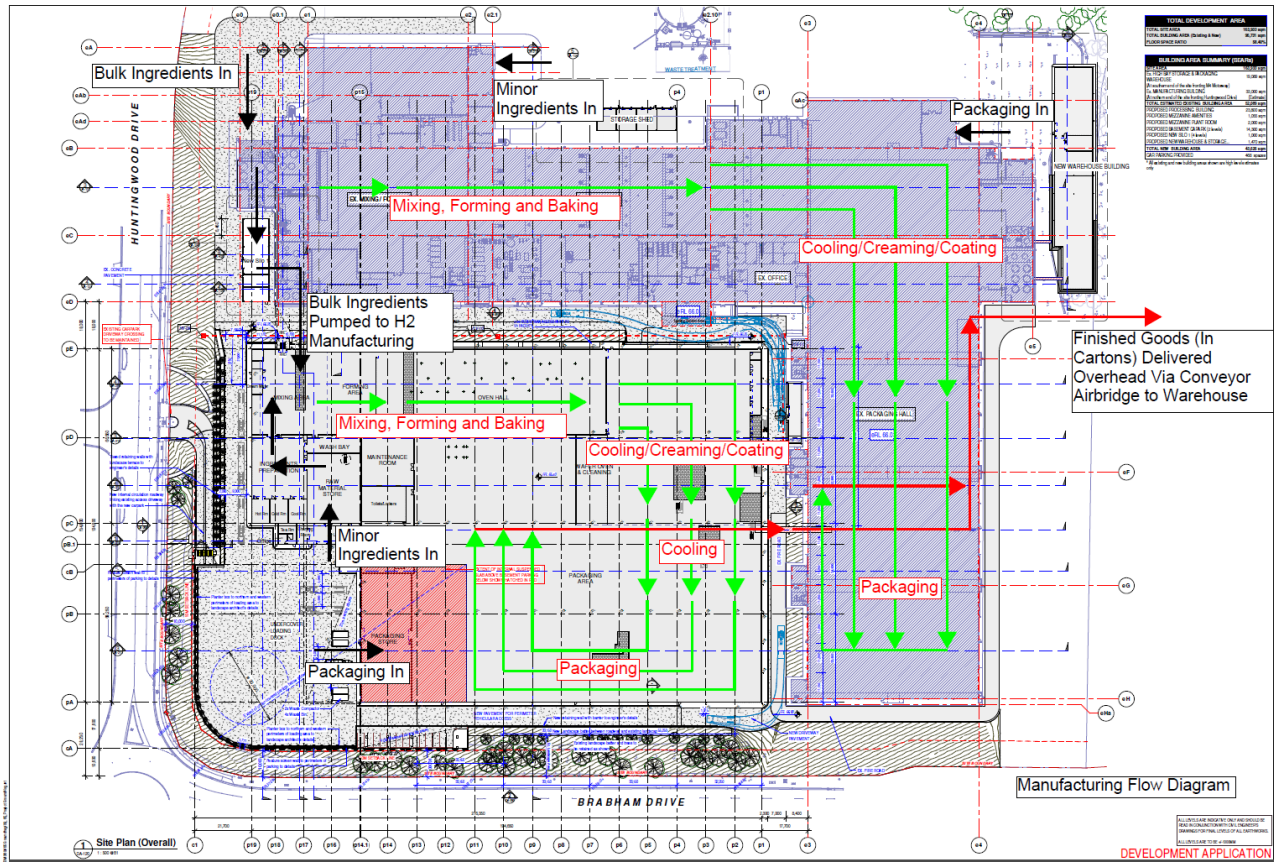
The proposed development has been located on residual land within the site and ensures the more efficient and effective integration with existing operations with minimal disruption during the construction phase. In this regard, the new facility has been placed adjacent to the existing processing building to leverage the existing capabilities within the site. This includes existing vehicle access to the site for the delivery of ingredients and materials through to the movement of finished goods to the warehouses in the southern portion of the site.

A flow chart detailing the general manufacturing process at the site is shown in **Figure 16** and is broadly summarised as follows:

1. Delivery of bulk ingredients to silos at northern end of the site using heavy vehicle access from Huntingwood Drive.
2. Biscuit production lines through existing and proposed processing buildings.
3. Packaging of finished goods.
4. Delivery of finished foods in cartons to warehouses at southern end of the site via conveyor airbridge.

The site will continue to operate 24 hours a date, seven days a week.

Figure 16 Manufacturing flow chart



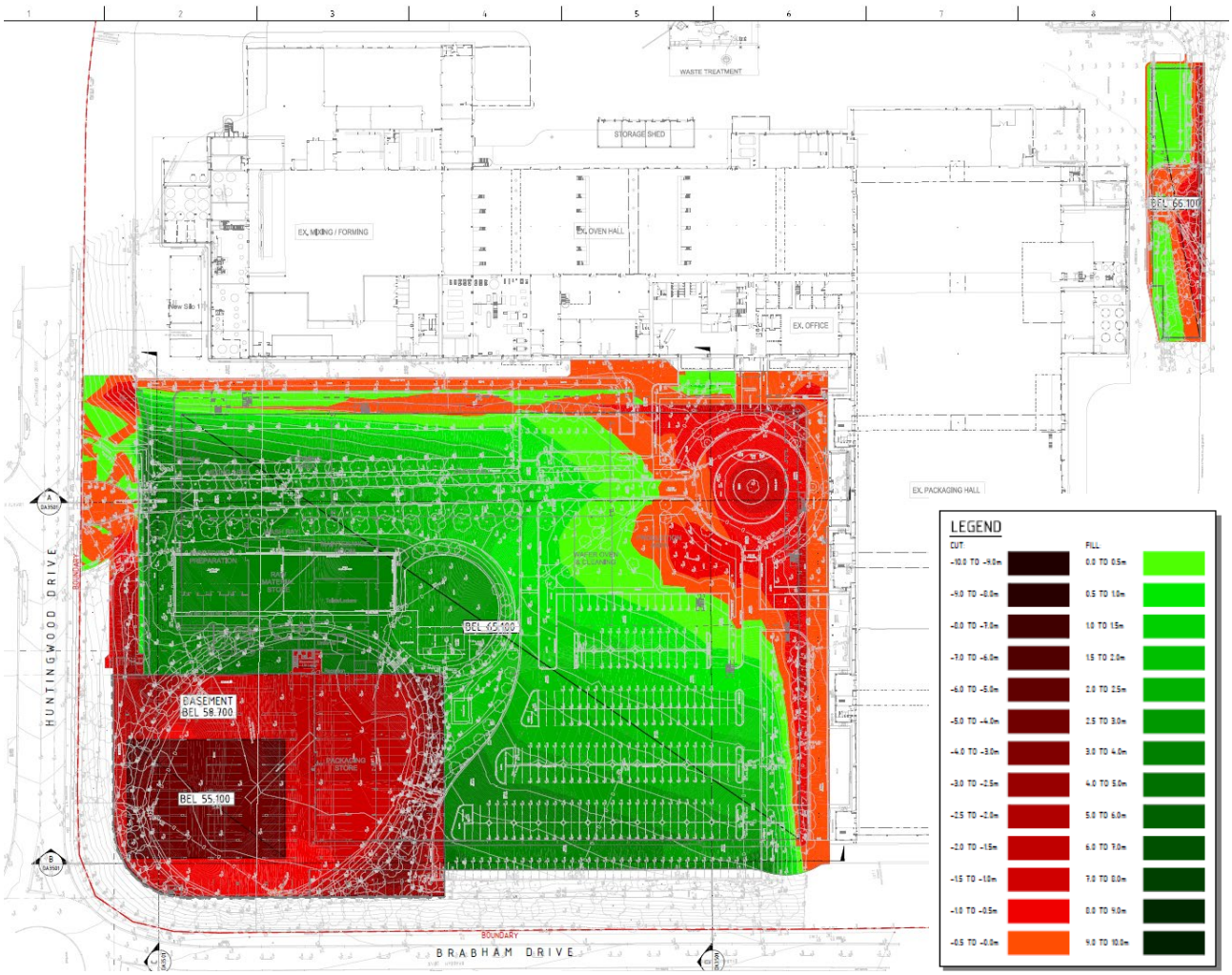
Source: HLA Architects and FDC

3.2.3.1. Demolition and Earthworks

To enable the redevelopment of the site, the existing car parking, driveway, ancillary structures and drainage connections in the north-western portion of the site will be demolished. A detailed Construction Management Plan (CMP) will be prepared by the appointed contractor prior to demolition works commencing and submitted to the relevant consent authority. The CMP will outline the extent of demolition works and the process and techniques to ensure the appropriate disposal of materials.

The proposal requires cut and fill to accommodate the car parking and loading structure and provide a flat building pad suitable for the development. A bulk earthworks plan is provided as part of the Civil Engineering Drawings at **Appendix P** and extract is provided in **Figure 17**. This figure shows that the cut will largely occur in the north-west corner and south-east of the project area. The maximum depth for the excavation is approximately 4m, whilst the maximum depth of fill is approximately 4.5m.

Figure 17 Bulk earthworks plan



Source: Sparks and Partners

3.2.3.2. Stormwater Management

There is an existing above ground OSD basin located within the site which is nominated to be replaced with an OSD tank below the basement car park. The existing stormwater is likely to be capped, demolished, or reconnected into the network via pits within the site.

Stormwater runoff from the development will be collected within the proposed stormwater management system within the site and will be directed through several pollution treatment devices as outlined in the Civil Engineering Drawings at **Appendix P.**

3.2.3.3. Transport and Parking

Construction

All construction vehicles will access the site via the existing heavy vehicle (eastern) access on Huntingwood Drive during the construction stages.

Prior to the demolition of the existing car park, approximately 260 car spaces required by Arnott's employees will need to be accommodated in other areas of the site during peak periods. This will be managed by utilising the following three areas for temporary car parking as shown in **Figure 18**:

- Western hardstand area to be line marked in accordance with AS 2890.1. This area will accommodate 95 car parking spaces.
- Eastern hardstand area to be line marked in accordance with AS 2890.1. This area will accommodate 80 car parking spaces.

- Existing car park located to the east of the high-bay warehouse. This car park accommodates 95 car parking spaces.

Access to all of these car parking areas will be via the existing loading dock entrance on Brabham Drive. Measures will be taken to ensure the safe passage of vehicles through the loading docks to the temporary car parking areas, and for pedestrians travelling between the car park and buildings within the site. This will be undertaken using signage, barriers and fencing where appropriate. The current parking demand for the existing facility is approximately 260 spaces. The temporary car parking area will accommodate a total of 280 spaces.

Figure 18 Temporary car parking during construction

Source: FDC

Operation

The proposed operation of the new facility will utilise the existing vehicle entry points to the site and will continue to separate light vehicles (western access) and heavy vehicles (eastern access).

A total of 468 car spaces will be provided on-site in the new basement car park for employees and visitors. In addition, six motorcycle spaces and 10 bicycle parking spaces will be provided on second level of the car park.

The loading and servicing bays for the proposed development are located in the new hardstand area that is attached to the new building. The loading area has sufficient turning area for the largest anticipated vehicles (26m B-double) in manoeuvring. There are two service bays located within the loading/servicing area for waste vehicles to access the waste bins.

3.2.4. Development Timing

The proposal does not seek approval for staged construction or occupation, however there will be three phases of construction works on the site. It is anticipated that construction will begin in early 2022 (pending timely development approval) and involves a 18-20 month construction and design program. Construction will generally occur in accordance with the staging plans provided at **Appendix I** to ensure minimal disruption to the existing operations at the site. The three phases are summarised as follows:

- Site Preparation and Enabling Works are anticipated to commence in early 2022 (subject to approval) and will involve the enabling works required for the two main construction phases. Construction access will be via the existing loading dock driveway on Brabham Drive. This stage will also involve the establishment of the temporary staff parking areas located adjacent to the high-bay warehouse.
- Construction Stage 1 is anticipated to be undertaken from Q2 2022 (subject to approval). This stage will involve the establishment of the main construction zone in the north-west corner of the site, the establishment of a construction waste storage area, the establishment of a construction loading area and the construction of the new multistorey basement car park. Construction access will be via the existing loading dock access located on Huntingwood Drive.
- Construction Stage 2 is anticipated to be undertaken from Q3 2022 until the completion of the new facility (subject to approval). This stage will involve the construction of the new production facility and loading dock. The construction access will remain the same as Stage 1. Employees of Arnott's will park their cars in the new multi-storey basement car park completed in Stage 1. Access to this car park will be separated from all construction traffic. Measures will be taken to ensure the safe passage of employees walking between the existing facility and the new employee car park.

4. STATUTORY CONTEXT

This section of the report provides an overview of the key statutory requirements relevant to the site and the project. It identifies the key statutory matters which are addressed in detail within the EIS, including the power to grant consent, permissibility, other approvals, pre-conditions, and mandatory considerations.

4.1. STATUTORY REQUIREMENTS

Table 6 categorises and summarises the relevant requirements in accordance with DPIE's *State Significant Development Guidelines*.

Table 6 Identification of statutory requirements for the project

Statutory Relevance	Action
Power to grant approval	In accordance with Schedule 1 of the SRD SEPP, development that has a CIV of more than $30 million for the purpose of food and beverage processing (including bakery) are classified as SSD: ***3 Agricultural produce industries and food and beverage processing*** *Development that has a capital investment value of more than $30 million for any of the following purposes—* *a. abattoirs or meat packing, boning or products plants, milk or butter factories, fish packing, processing, canning or marketing facilities, animal or pet feed production, gelatine plants, tanneries, wool scouring or topping or rendering plants,* *b. cotton gins, cotton seed mills, sugar mills, sugar refineries, grain mills or silo complexes, edible or essential oils processing, breweries, distilleries, ethanol plants, soft drink manufacture, fruit juice works, canning or bottling works, bakeries, small goods manufacture, cereal processing, margarine manufacturing or wineries,* *c. organic fertiliser plants or composting facilities or works.* The proposed works have an estimated CIV of $115,930,775 (refer **Appendix G**) and accordingly, the proposal is SSD for the purposes of the SRD SEPP.
Permissibility	The site is zoned IN2 Light Industrial in accordance with the BLEP 2015. The proposed development would be considered 'General industry': ***general industry** means a building or place (other than a heavy industry or light industry) that is used to carry out an industrial activity.* ***industrial activity** means the manufacturing, production, assembling, altering, formulating, repairing, renovating, ornamenting, finishing, cleaning, washing, dismantling, transforming, processing, recycling, adapting or servicing of, or the research and development of, any goods, substances, food, products or articles for commercial purposes, and includes any storage or transportation associated with any such activity.* General industry is not listed as a prohibited use in the land use table and is therefore permitted with consent in the IN2 zone.

Statutory Relevance	Action
Other approvals	
No requirements for other approvals have been identified at this stage.	

4.1.1. Pre–Conditions

Table 7 outlines the relevant pre-conditions to exercising the power to grant approval.

Table 7 Pre-conditions

Statutory Reference	Pre-condition	Relevance	Section in EIS
State Environmental Planning Policy No 55 - Remediation of Land (SEPP 55) - clause 7(1)	A consent authority must be satisfied that the land is suitable in its contaminated state - or will be suitable, after remediation - for the purpose for which the development is proposed to be carried out.	Potential sources of contamination exist at the site but are not expected to preclude the proposed development of the site.	**Section 6.7.5**

4.1.2. Mandatory Considerations

Table 8 outlines the relevant pre-conditions to exercising the power to grant approval.

Table 8 Mandatory considerations

Statutory Reference	Mandatory Consideration	Section in EIS
Consideration under the EP&A Act and Regulation		
Section 1.3	Relevant objects of the EP&A Act	**Appendix C**
Section 4.15	Relevant environmental planning instruments ▪ *State Environmental Planning Policy No 33 – Hazardous and Offensive Development* (SEPP 33)	**Section 6.5** and **Appendix K**
	▪ SEPP 55 – Remediation of Land	**Section 6.7.5**. and **Appendix R**
	▪ BLEP 2015	**Appendix C**
	Relevant draft environmental planning instruments ▪ Draft State Environmental Planning Policy (Remediation of Land)	**Appendix C**
	Relevant planning agreement or draft planning agreement	**N/A**

Statutory Reference	Mandatory Consideration	Section in EIS
	▪ None relevant to the proposed development	
	Development control plans ▪ *Blacktown Development Control Plan 2015* (BDCP 2015)	**Appendix C**
	The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.	**Section 6**
	The suitability of the site for the development	**Section 6.16**
	The public interest	**Section 7**
Mandatory relevant considerations under EPIs		
SEPP 33 - clause 8	Departmental guidelines: ▪ Applying SEPP 33 (identify relevant requirements)	**Section 6.5** and **Appendix K**
BLEP 2015	Objectives and land uses for IN2 Zone ▪ Part 4 – Principal development standards ▪ Part 5 – Miscellaneous provisions ▪ Part 7 – Additional local provisions	**Appendix C**
Considerations under other legislation		
Biodiversity Conservation Act 2016 (BC Act) – section 7.14	The likely impact of the proposed development on biodiversity values as assessed in the Biodiversity Development Assessment Report (BDAR). The Minister for Planning may (but is not required to) further consider under that BC Act the likely impact of the proposed development on biodiversity values.	**Section 6.11**
Development Control Plans		
BDCP 2015	Clause 11 of the SDR SEPP states that development control plans (whether made before or after the commencement of this Policy) do not apply to SSD. As such, there is no requirement for assessment of the proposal against the BDCP 2015 for this SSDA. Notwithstanding this, consideration has been given to the following provisions: ▪ Part A Introduction and General Guidelines ▪ Part E Development in Industrial Zones	**Appendix C**

Statutory Reference	Mandatory Consideration	Section in EIS
	▪ Part J Water Sensitive Urban Design and Integrated Water Cycle Management	

5. ENGAGEMENT

The following sections of the report describe the engagement activities that have been undertaken during the preparation of the SSDA.

5.1. ENGAGEMENT CARRIED OUT

Community and stakeholder engagement has been undertaken by the Project Team in the preparation of the SSDA. This included direct engagement and consultation with:

- Neighbouring landowners and occupants
- Government, agency and utility stakeholders listed within the SEARs

The community and stakeholder engagement undertaken has sought to address the requirements of the SEARs and included:

- High-level Engagement and Communication Plan
- Letterbox drop
- Dedicated 1800 number and email feedback channels.

Details of the outcomes of the community and stakeholder engagement is contained in the Engagement and Communication Outcomes Report prepared by Urbis at **Appendix E** and the community engagement table at **Appendix D.**

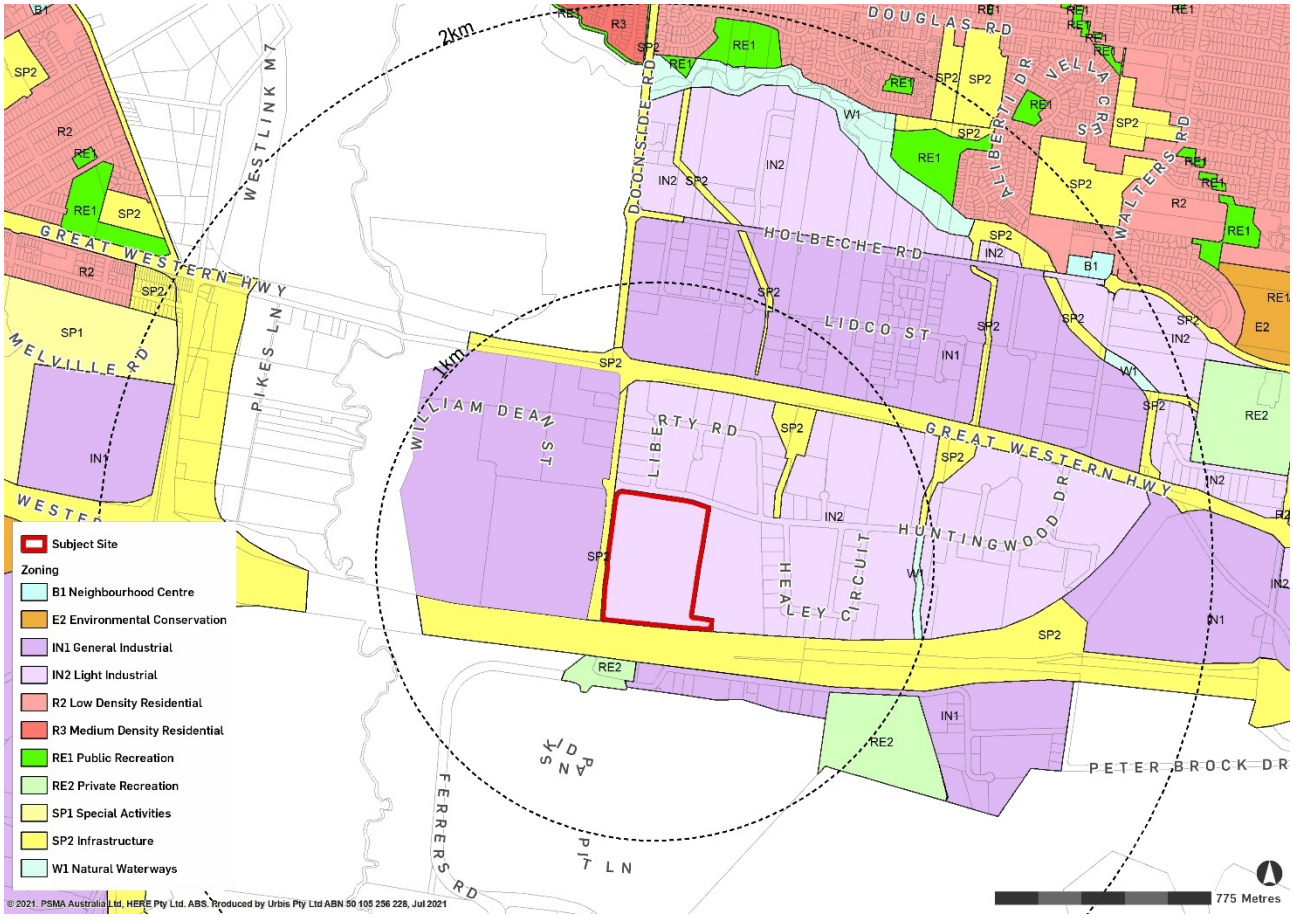
5.2. COMMUNITY FEEDBACK

The project involves the expansion of existing operations in an established industrial precinct with no sensitive land uses nearby. The closest residential and sensitive land uses are shown in **Figure 19** and are generally located over 1km from the site.

Given there are no sensitive land uses within the immediate area, dedicated engagement as part of the preparation of the EIS was limited to owners and occupants of surrounding properties. A letter was distributed to the owners and occupants of these properties by Urbis. The letter included an outline of the proposal, the planning and consultation processes and provided information on how to give feedback and how that feedback would be used.

At the time of writing the EIS, no feedback has been submitted through the Urbis Engagement enquiry line or email address.

Figure 19 Location of residential and sensitive land uses



Source: Urbis

5.3. GOVERNMENT STAKEHOLDER CONSULTATION

Consultation with Council and DPIE has taken place in advance of the request for SEARs. Further consultation has taken place with some these agencies following the issue of SEARs to ensure that the EIS responds positively to the key assessment matters.

The following Government, agency and utility stakeholders were consulted during the preparation of the SSDA:

- Blacktown City Council
- Environment, Energy and Science Group (EESG)
- NSW Fire and Rescue
- Sydney Water
- Transport for NSW
- Water NSW
- Food Authority NSW
- Endeavor Energy

In accordance with the Regulations, the EIS will be placed on formal public exhibition once DPIE review the document as being 'adequate' for this purpose.

Following this exhibition period, the applicant will respond to any matters raised by notified parties.

6. ASSESSMENT OF IMPACTS

This section of the report assesses and responds to the environmental impacts of the proposed DA, in response to the matters for consideration outlined within the SEARs. Given the nature of the proposed development within an established industrial precinct with no sensitive land uses nearby, consideration of the key impacts was limited to standard assessments.

Further detailed information is appended to the EIS, including:

- SEARs compliance table identifying where the SEARs have been addressed in the EIS (**Appendix A**).
- Statutory compliance table identifying where the relevant statutory requirements have been addressed (**Appendix C**).
- Community engagement table identifying where the issues raised by the community during engagement have been addressed (**Appendix D**).
- Proposed mitigation measures for the project which are additional to the measures built into the physical layout and design of the project (**Appendix E**).

The technical reports and plans prepared by specialists and appended to the EIS are individually referenced within the following sections.

6.1. TRAFFIC AND TRANSPORT

A Traffic Impact Assessment (TIA) has been prepared by Urbis and is provided in **Appendix L**. The TIA assessed the anticipated transport implications of the proposal during the construction and operational stages.

6.1.1. Construction Traffic Impacts

The construction contractor anticipates a peak of approximately 50 deliveries a day generated by construction vehicle movements. This peak is likely to only occur during concrete pours which are a very limited part of the construction program. The contractor anticipates an average of five deliveries per day during the construction period. To manage the traffic impact that these vehicle movements will have, the contractor has proposed the encouragement of

- Staggered delivery times throughout the day.
- Set-down areas for trucks to stand and wait to be unloaded.
- Traffic control at entry points.
- Sequencing of construction works to minimise major vehicle movements overlapping.
- The pre-fabrication of products where possible.

The contractor has provided estimates of the average number of workers accessing the site per day at different construction stages, which are as follows

- Site preparation and enabling works: 15 persons per day.
- Construction of the new processing facility: 150 persons per day.

All construction workers will not be allowed to park their vehicles within the site. To ensure that the surrounding street network does not become filled with workers parking their vehicles, shuttle services will be arranged to transport tradesmen to the site from their respective bases. The use of public transport is also to be encouraged.

The construction will be undertaken in three phases. During the first phase, Arnott's staff will park in the existing staff car park. During the second phase, Arnott's staff parking will be moved to the south of the site, adjacent to the existing high-bay warehouse. During the third stage, Arnott's staff will park in the completed multi-storey basement car park that will be constructed during the first and second stage (refer **Appendix I**).

Access to all of these car parking areas will be via the existing loading dock entrance on Brabham Drive. Measures will be taken to ensure the safe passage of vehicles through the loading docks to the temporary

car parking areas, and for pedestrians travelling between the car park and buildings within the site. This will be undertaken using signage, barriers and fencing where appropriate. The current parking demand for the existing facility is approximately 260 spaces. The temporary car parking area will accommodate a total of 280 spaces.

The temporary car parking will include an area of existing hardstand to the north of the high-bay warehouses. Heavy vehicles accessing this area involves a maximum of 35 vehicles that are spread evenly between 6am and 10pm. Given the size of the hardstand area associated with the high-bay warehouses and the known vehicle generation, there will be sufficient space to support the temporary car park without impacting heavy vehicle movements to the loading area.

6.1.2. Access and Servicing

Access to the site for heavy vehicles will be via the existing easternmost access point on Huntingwood Drive and the existing access on Brabham Drive. These will provide access to the existing and new loading/servicing areas via an extension of the site's northern road. Access to the site for light vehicles will be via the existing westernmost access point on Huntingwood Drive into a new multi-storey basement car park. All access points are designed in accordance with AS 2890, TfNSW and Council guidelines.

6.1.3. Traffic Generation

Traffic generation for the proposed development has been provided in **Table 9**. There are three shift times across the day which are the day, afternoon and evening shifts. The existing facility (known as HW1) operates 24 hours a day, seven days a week and the proposed development will operate in a similar manner. The existing facility operates according to the following shifts:

- Day shift – 7 AM to 3 PM.
- Afternoon shift – 3 PM to 11 PM.
- Night shift – 11 PM to 7 AM.

The new facility (known as HW2) will operate according to the following shifts to avoid peak hour times (in particular 7 AM to 9 AM) and will be:

- Day shift – 6 AM to 2 PM.
- Afternoon shift – 2 PM to 10 PM.
- Night shift – 10 PM to 6 AM.

Table 9 Estimated traffic generation of the proposed development

Facility	Shift	Time	Vehicle Entries	Vehicle Exits
Huntingwood 1 (existing)	Day shift changeover	6:30-7:00 AM	174	0
		7:00-7:30 AM	0	113
	Afternoon shift changeover	2:30-3:00 PM	77	0
		3:00-3:30 PM	0	174
	Night shift changeover	10:30-11:00	109	0
		11:00-11:30	0	77
Huntingwood 2 (proposed)	Day shift changeover	5:30-6:00 AM	110	0
		6:00-6:30 AM	0	69
	Afternoon shift changeover	1:30-2:00 PM	94	0
		2:00-3:00 PM	0	110
	Night shift changeover	9:30-10:00	69	0
		10:00-10:30	0	94

Source: Arnott's

Delivery and service vehicle generation is provided in **Table 10** and includes the number and arrival times of different types of service vehicles.

Table 10 Delivery and service vehicle generation

Vehicle type	Estimated arrival time period	Existing Vehicle Numbers	Expected Additional Daily Vehicle Numbers	Total
Raw Materials				
Semi-trailer tanker	24 hrs a day	12	3	15
Semi-trailer	7 AM - 7 PM	8	4	12
Rigid truck	7 AM - 7 PM	6	1	7
Waste				
Rigid waste collection vehicle	5 AM - 11 PM	6	2	8

Vehicle type	Estimated arrival time period	Existing Vehicle Numbers	Expected Additional Daily Vehicle Numbers	Total
Semi-trailer	7 PM - 3 PM	2	1	3
Packing materials				
B-double	7 AM - 6 PM	Once or twice a week – no change		
Semi-trailer	7 AM - 6 PM	7	2	9
Rigid truck	7 AM - 6 PM	5	2	7
High Bay Warehouse				
B-Double	6 AM – 10 PM	9	2	11
Semi-trailer	6 AM – 10 PM	15	2	17
Rigid	6 AM – 10 PM	1	0	1
Container delivery/collection	6 AM – 10 PM	4	2	6
Service and support vehicles				
Courier vans	7 AM - 5 PM	3	1	4
Engineering service vans	7 AM - 5 PM	1	0	1
Delivery trucks (assume MRV)	7 AM - 5 PM	2	1	3

Source: Arnott's

By comparing shift times, the peak traffic generating period for the proposed development has been identified as 6:30 AM to 7:30 AM. This time period factors in the changeover between the night shift and day shift. During this period in a worst-case scenario, the existing 318 trips by employees during the HW1 shift changeover will move either in or out of the basement car parking area during the shift changeover. During this time period in a worst-case scenario, one semi-trailer tanker and one rigid waste collection vehicle will access the loading and servicing area of the proposed development. Traffic generated by the new facility (HW2) will arrive and depart outside the peak period.

The results of the SIDRA modelling indicate the existing network is currently performing adequately. The intersection of Huntingwood Drive and Brabham Drive currently experience a level of service (LoS) A during the AM peak period and a level of service B during the PM peak period. This indicates that the intersection has good operation during the AM peak and a good operation with acceptable delays during the PM peak.

The upgraded facility is anticipated to be operational by 2024. Based on the SIIDRA modelling undertaken as part of the TIA, the roundabout at the intersection of Huntingwood Drive and Brabham Drive will still be operating at a satisfactory level during both peaks once the development is operational. Impacts of the site access points on the road network will remain negligible.

6.1.3.1. Cumulative Impacts

At the time of preparing the TIA, there were no other development applications (local or SSD) or SSI projects proposed or under construction in the immediate vicinity of the site.

The site is within an established industrial precinct. The background traffic growth for both Brabham Drive and Huntingwood Drive is assumed to be 1% due to the surrounding lands already being developed. A 1% growth rate has been applied to the peak period traffic counts that were recorded in 2018 to the following 10 years after the expected completion date of the development in 2024.

In 2034, the roundabout at the intersection of Huntingwood Drive and Brabham Drive will still be operating at a satisfactory level during the AM peak, however, during the PM peak LoS E is experienced with an average delay time of 67.1 seconds and degree of saturation of 1.272. While this is not a satisfactory performance level, it is completely unrelated to the operations of the Arnott's site and improvements to the Huntingwood Drive/Brabham Drive intersection should be considered (outside the scope of the development).

6.1.4. Parking and Loading Area

The proposal involves the removal of the existing 260 at-grade car parking spaces and the construction of a new multi-storey car park comprising 468 spaces. Together with the 95 spaces in the southern portion of the site (to be retained), the proposal will have a total of 563 spaces.

The TfNSW *Guide to Traffic Generating Developments* stipulates car parking requirements for different land uses. These rates and calculation of total off-street parking requirements for the proposed development are outlined in **Table 11**.

Table 11 TfNSW Guide to Traffic Generating Developments compliance

Land use	Quantum/detail (GFA)*	Parking provision rate	Minimum parking requirement
Factory (proposed)	30,330 m^2 GFA	1.3 spaces per 100 m^2 of GFA	395
Factory (existing)	33,000 m^2 GFA	1.3 spaces per 100 m^2 of GFA	429
Warehouse (existing)	19,089 m^2 GFA	1 space per 300 m^2 of GFA	64

Total GFA includes all existing and new buildings and excludes car park.

**It is noted that the TfNSW Guide defines GFA differently from that of the Blacktown DCP. Under the TfNSW Guide, GFA for a "factory" includes any manufacturing process within the meaning of the Factories, Shops and Industries Act 1962. This includes all areas associated with the manufacturing of a product. There was no defined definition of GFA for a warehouse, the same definition of GFA used for a factory was applied to determine the warehouse GFA.*
Source: Urbis

Car parking requirements are also outlined in the BDCP 2015 at Part E Development in the Industrial Zones section 4.8 and Part A Introduction and General Guidelines section 6.3. **Table 12** outlines the requirements for car parking for the proposed development under the current BDCP provisions.

Table 12 BDCP 2015 car parking compliance

Land use	Requirement*	GFA detail	Minimum parking requirement
Light industry, general industry, heavy industry and warehouse or distribution centre (proposed)	1 space per 75 m^2 GFA Plus 1 space per 40 m^2 GFA for the office component	General Industry = 25,595 m^2 GFA Office component = 650 m^2 GFA	358

Land use	Requirement*	GFA detail	Minimum parking requirement
Light industry, general industry, heavy industry and warehouse or distribution centre (existing)	1 space per 75 m^2 GFA Plus 1 space per 40 m^2 GFA for the office component	General Industry = 29,228 m^2 GFA Office component = 18,556 m^2 GFA	699

Total GFA includes new processing buildings, proposed amenities (includes 650sqm of office) and storage shed.

** The Blacktown DCP defines GFA differently to the TfNSW Guide. The Blacktown DCP excludes areas such as plant rooms, stairwells, elevators, air-conditioning generation areas basements and certain terrace areas from any GFA calculation. These areas have been excluded from the GFA calculations relevant to the Blacktown DCP together with the ingredient silos as they are not accessible areas for staff.*
Source: Urbis

While the proposed parking supply within the site (inclusive of existing and proposed development) would not meet these requirements, the proposal can accommodate the off-street parking requirements of the entire site based on the known shift profiles as outlined in **Table 9**. This approach is consistent with the BDCP, which recognises that the parking provisions are a comprehensive guide and there is an opportunity to consider the parking requirements on the merit of the application.

Because the total car parking demand for the existing facility is known, a car parking rate for the existing site was developed. This car parking rate was then applied to the total GFA of the site once the proposed development is completed.

Table 13 demonstrates the current car parking rate of the site based on the existing GFA. **Table 14** applies this parking rate of the existing facility to the fully upgraded facility.

Table 13 Existing parking rate

Current site GFA	Current number of car parking spaces	Parking rate
59,089sqm GFA	355	0.6 parking spaces per 10sqm of GFA

** Total GFA includes all existing buildings.*
Source: Urbis

Table 14 Parking rate based on proposed site GFA

Current site GFA	Current number of car parking spaces	Parking rate
89,632sqm GFA	0.60 parking spaces per 100sqm of GFA	537

** Total GFA includes all existing buildings and all new buildings excluding car park*
Source: Urbis

Having regard to the above tables, the parking demand for the fully operational site is 537 car parking spaces. The completed site will have 563 car parking spaces and therefore adequate car parking will be available within the site to satisfy the parking demands of the facility. It is noted that the southern car park is highly under-utilised with only 15-20 spaces used on a regular basis. The parking rate calculated is therefore considered to be conservative.

The loading and servicing bays for the proposed development are located in the new hardstand area that is attached to the new processing building. The largest vehicle that the site has been designed to accommodate is a B-double, measuring 26m long and 2.5m wide. There are two service bays located within the new loading lock for waste vehicles to access the waste bins.

The TIA confirms that all circulation areas, hardstand and parking areas have been designed with reference to the Australian Standards and provide for vehicles up to and including a 26m B-Double, and that all access driveways, parking areas and service areas have been designed with reference to the appropriate Australian Standards. It is anticipated that full design compliance with the relevant Australian Standards would form a standard Condition of Consent further to approval, which will also provide for any minor design changes if required.

6.1.5. Green Travel Plan

Notwithstanding the site currently being constrained by limited public transport availability, a Green Travel Plan has been appended to the TIA that outlines proposed initiatives to promote green travel amongst employees and visitors.

One of the aims of the GTP is to manage the movement of staff during the shift changeover period. The morning shift changeover (5:30-6:30 AM) could see 464 vehicle movements in and out of the facility (light and heavy vehicles inclusive). Carpooling was identified as an ideal initiative for workers as during the early morning there could be limited public transport service depending on the location of staff residence. If 1 in 5 staff members carpooled, there would be 92 fewer vehicles either entering or exiting the facility during the morning shift changeover.

In addition, the development will incorporate 10 bicycle parking spaces in the second level of the proposed basement car park and the new changeroom will have showers for staff.

6.2. NOISE AND VIBRATION

A Noise and Vibration Assessment has been prepared by SLR Consulting Australia Pty Ltd (SLR) and is provided at **Appendix M**. The report included an assessment of the noise and vibration impacts of the proposal with regards to construction noise and vibration, and operational noise.

- The identified sources of noise from the proposed development include:
  - Mechanical plant
  - Internal operations
  - Trucks unload to silos
  - Skip bin change outs
  - Truck and light vehicle movements on internal access roads

In summary, the Noise and Vibration Assessment included the following findings:

- The closest residential sensitive receivers are generally located more than 1km from the site.
- Noise levels during the construction of the development are not anticipated to exceed the Noise Management Levels (NMLs) at any time during works in accordance with the NSW *Interim Construction Noise Guideline*. Nonetheless, a number of best-practice mitigation and management measures have been recommended to be applied, where feasible and reasonable, to minimise the impacts during construction as far as practicable.
- The major potential sources of vibration from the proposed construction activities would likely be during demolition and earthworks when rock breakers and vibratory rollers are being used. All receivers are outside of the safe work distances for cosmetic damage. Whilst occupants of surrounding buildings may be able to perceive vibration impacts during construction, this would only be apparent for relatively short durations when vibration intensive equipment is in use.
- The potential noise impacts from additional traffic are unlikely to result in a noticeable increase in noise given the small number of vehicles accessing the development relative to the high existing volumes on this route.
- Operational noise emissions from the proposal have been predicted to the surrounding receivers and the levels are expected to comply with the trigger levels in accordance with the NSW *Noise Policy for Industry*. No specific mitigation measures are required to be considered.
- No exceedances of the sleep disturbance screening criteria were found.

6.2.1. Cumulative Impacts

The existing noise environment at the site is generally dominated by road traffic, noise from other existing industry and local flora and fauna. Given this and the low predicted noise levels at the nearest residential receiver (9 Flemming Grove, Doonside) cumulative impacts are not predicted to be a concern once the development is operational.

6.2.2. Mitigation Measures

Construction

Best practice mitigation measures have been recommended during the construction works to minimise potential impacts on the surrounding commercial and industrial activities. The measures are detailed in Table 20 of the Noise and Vibration Impact Assessment at **Appendix M** and include the following practices:

- Provide appropriate respite periods when noise intensive works are undertaken or during periods of high noise impacts.
- Carry out community consultation to determine the need and frequency of respite periods, if necessary.
- Avoid loading and unloading of materials / deliveries outside of daytime hours.
- Compounds and work areas should be one-way to minimise the need for vehicles to reverse.
- Training should be provided to project personnel, including relevant sub-contractors, on noise and vibration requirements and the location of sensitive receivers during inductions and toolbox talks.
- Use the minimum sized equipment necessary to complete the work and where possible, use alternative, low-impact construction techniques.
- Power tools should use mains power where possible rather than generators.
- Shut down machinery, including generators, when not in operation.
- All equipment should be appropriately maintained and fitted with noise control devices, where practicable, including acoustic lining of engine bays and air intake / discharge silencers, etc.
- Provide appropriate notice to the affected sensitive receivers prior to starting works and before any noisy periods of works.
- Where there are complaints regarding noise, review and implement additional control measures, where feasible and reasonable.
- Conduct noise and/or vibration monitoring in response to any valid complaints received.
- Conduct vibration monitoring whenever vibration intensive works are undertaken within the minimum working distances of sensitive receivers or structures.

Operation

No specific mitigation measures are required to manage operational noise emissions.

6.3. AIR QUALITY AND ODOUR

An Air Quality and Odour Impact Assessment has been undertaken by SLR and is provided at **Appendix N.** The assessment provides analysis of the air quality impact of the proposed development on surrounding sensitive receivers during the construction and operation of the proposed development.

The identified sources of air emissions from the proposed development include:

- Odour emissions from the baking and processing of products
- Odour emissions from ingredient storage
- Combustion gas emissions from the operation of the gas fired ovens
- Odour emissions from the treatment of wastewater and storage of sludge

- Products of fuel combustion (including particulates) from onsite vehicle movements; and
- Wheel-generated particulate emissions from onsite vehicle movements.

In summary, the Air Quality and Odour Assessment included the following findings:

- Temporary elevation in the emissions of particulate matter and local dust is considered to be inevitable as part of the construction works, particularly where those activities are undertaken during periods of low rainfall and/or windy conditions. The impact of elevated dust emissions is dependent upon the potential for particulates to become and remain airborne prior to being deposited as dust or experienced as an ambient particulate concentration. The construction phases can be adequately managed so that the short-term and temporary dust related impacts will remain to be low risk.
- Given the nature of the construction works, it is considered that the emissions generated due to the combustion of fuel in construction plant and machinery will be of limited duration and small compared to the emissions generated by road traffic on the surrounding road network. Given the short term and low level of emissions of these pollutants from the site during the construction works, they are considered unlikely to have significant impacts on local air quality and have not been considered any further in this assessment.
- Odour emissions will occur from the baking-related activities at the expanded facility. There are no separation guidelines specified by the NSW Environment Protection Agency (EPA), however the assessment considered the regulatory framework for the ACT, Victoria and Western Australia. In relation to the proposed bakery operations, a conservative separation distance of 200m to a sensitive use has been adopted based on the referenced documents and bakery production capacity. The nearest residential receptors are located more than 1km from the site and a hotel to the south of the site is located approximately 400m from the proposal, meaning the adopted separation distance would be met.
- Given the scale of on-site vehicle parking and proposed increases in delivery truck operations it is considered that the emissions generated due to the combustion of fuel in light and heavy vehicles generated by the proposal will be negligible compared to the emissions generated by traffic on the surrounding road network and do not represent a major increase relative to the existing operations.
- The increase in natural gas combustion from the gas-fire ovens would have no significant potential for off-site exceedances of ambient air quality criteria provided emissions are appropriately dispersed from a suitably designed stack. Combustion emissions from the gas-fired ovens will be vented via stacks located on the roof of the building, which will promote dispersion and minimise off-site ground level concentrations of air pollutants.

6.3.1. Cumulative Impacts

Sources of air emissions and odour in the area with the potential to result in cumulative impacts with emissions from the construction and operation of the proposal were considered as follows:

- Traffic emissions from the surrounding road network: As highlighted previously, the emissions generated by traffic on the surrounding road network will be negligible and do not represent a major increase relative to the existing operations.
- The Diageo Australia operations: This site reported emissions of volatile organic compounds (VOCs) on the National Pollutant Inventory, however the potential for odour emissions would be of a very different character to those emitted from the existing and proposed operations at the site. There is not considered to be any potential for cumulative impacts from this facility with air emissions from the operation of the site.
- Cookers Bulk Oil System, located at 2 Healey Circuit, Huntingwood that is licenced to receive and store “Used cooking oil only”: Any odour emissions from this site would be of a very different character to those emitted from the existing and proposed operations at the site. There is not considered to be any potential for cumulative impacts from this facility with air emissions from the operation of the site.

6.3.2. Mitigation Measures

Construction Phase

Best practice dust controls have been recommended during the construction works to minimise potential impacts on the surrounding commercial and industrial activities. The measures are detailed in Table 19 of the Noise and Vibration Impact Assessment at **Appendix N** and include the following practices:

- Communication management
- Record or all complaints and incidents
- Regular site inspections
- Management of machinery and barrier locations and construction techniques / methods
- Management of vehicle idling and usage

These mitigation techniques will ensure that the low risk of dust emissions are minimised.

Operational Phase

The following mitigation measures have been adopted for the proposal:

- Discharges of pollutants to the air from the majority of potentially odorous activities (ovens and production areas) will be captured by BCA and AS standard compliant extraction systems and directed to rooftop vents.
- Containment measures for spillages will be provided at appropriate locations in the expansion area to reduce odorous emissions from waste spillages.
- The good housekeeping observed during the site visit will continue to be maintained on all areas of the Site, including regular cleaning of all internal and external areas.
- Organic waste and general waste will be removed from site for off-site disposal on a daily basis, Monday to Friday. In addition:
  - All generated waste will be identified and separated into common material streams or categories at the point of generation for separate collection. This ensures that any waste that has the potential to cause odour emissions is dealt with appropriately.
  - All organic waste will be stored in closed containers and away from direct sun.
  - All putrescible waste materials will be covered during transport.
  - Signage will be provided in waste management and processing areas to provide information relating to general housekeeping requirements and to act as a daily reminder to staff working at the premises.
- The physical controls (including ventilation fans, exhaust stacks, extraction hoods, grease traps, air pollution control devices etc.) are/will be designed to allow for easy and safe cleaning and maintenance. Regular cleaning of physical controls is and will be undertaken as per manufacturer's requirements.
- BCA/AS standard compliant extraction systems are being designed for the Project in order to extract emissions and discharge them to atmosphere via dedicated discharge vents. Air pollution control devices may be implemented to further reduce emissions where complaints are received in relation to nuisance odour or where prolonged smoke is visible during normal or peak operations (i.e. not during start up or shut down).
- Signage should be displayed to remind drivers to turn off vehicle engines when idling at the Site for longer than 1 minute to minimise exhaust emissions.
  - General environmental awareness training should be provided to relevant staff and contractors, including:
  - Potential air quality and odour impacts that may be caused by activity during normal and abnormal circumstances;
  - Prevention of accidental air emissions and actions to be taken when accidental emissions occur;

  - Efficient and appropriate use and maintenance of equipment used on the Site (where relevant to their role); and
  - Procedures for complaint handling.
- All staff and contractors should be instructed to report any undue pollutant release (including odour) and visible emissions from the exhaust vents to the Site manager.
- In order to reduce the company's overall carbon footprint and combustion gas emissions generated by vehicles, it is recommended that commuting to work using sustainable modes of travel (such as public transport, cycling, and car share) be encouraged through the implementation of an incentive scheme and that facilities for cyclists such as bike storage areas, showers and lockers be provided.

No specific mitigation measures are required to manage odour emissions.

6.4. VISUAL IMPACTS

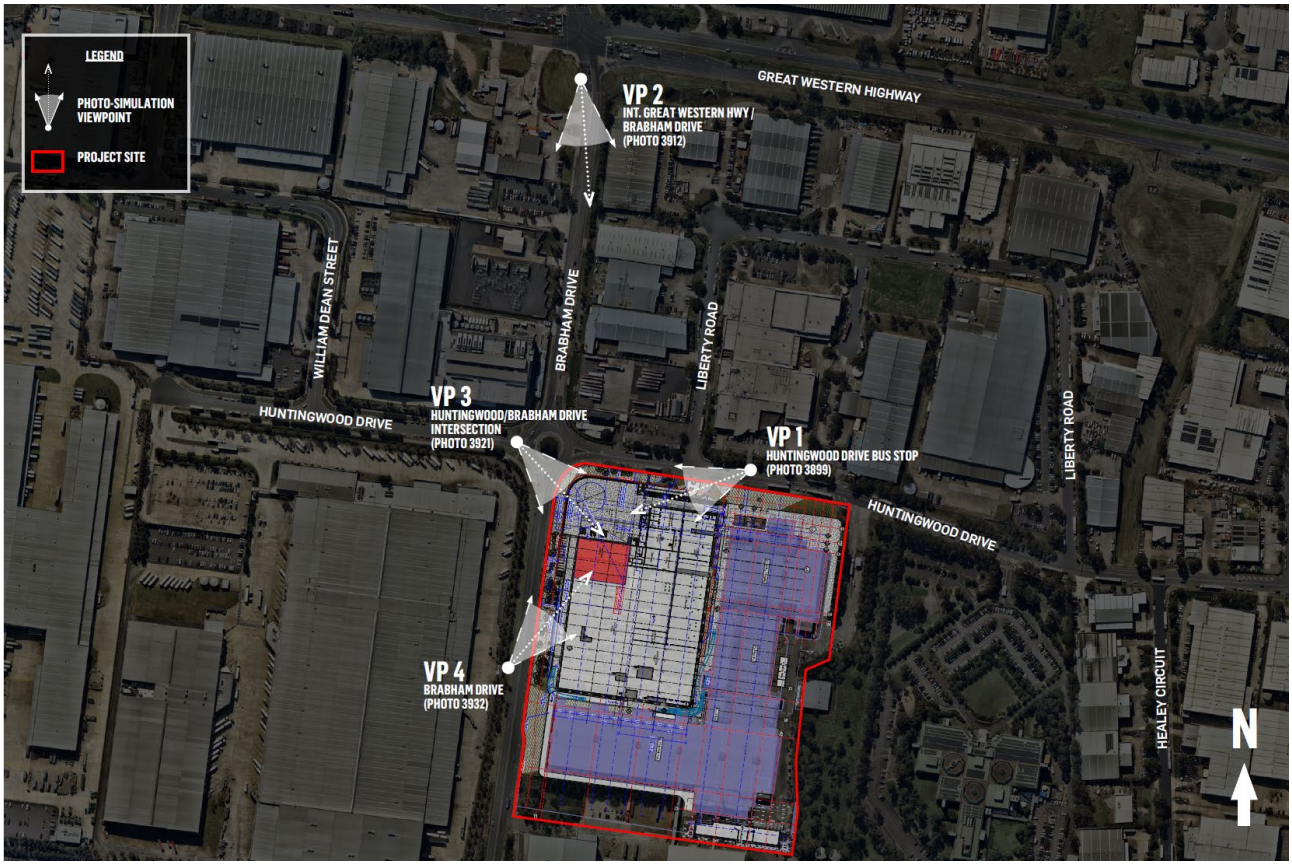
A Visual Impact Assessment (VIA) of the proposed development has been prepared by Urbis and is provided at **Appendix O**. The VIA assesses the visual impact of the development layout and design on nearby public and private receivers and significant vantage points in the public domain. Visual effects of the proposal were assessed against the methodology criteria including view place sensitivity, viewer sensitivity, viewing period and scenic quality.

As outlined in the VIA, the existing visual catchment is summarised as follows:

- The immediate visual context is characterised by industrial-scale warehouse buildings of varying height, bulk and scale. Larger scale built forms exist immediately west and north-west of the site. These facilities include buildings which occupy the majority of their sites and include visible areas of hardstanding and limited screen or ameliorative planting.
- There are no sensitive or important public domain view locations within the immediate visual catchment.
- No residential development is located within the immediate visual catchment of the site with the closest residents located more than 1km to the north-east.
- Views from all roads and intersections would be exposed to views of the proposed development for short time periods and from moving view situations.

Photomontages from four view points were prepared as part of the VIA (refer to **Figure 20**). These views represent a range of view points from which the proposed development may have a visual effect or impact. The existing and proposed views from the closest viewpoints to the site (VP1 and VP3) are included in **Figure 21** and **Figure 22**. Additional photomontages detailing the proposed screen planting based on 10 year growth are also provided.

Figure 20 View location map



Source: Urbis

Figure 21 View 1 – South-west from Huntingwood Drive towards existing site entry

Picture 11 View 1 - Existing view

Picture 12 View 1 -Proposed view

Source: Urbis

Picture 13 View 1 – Proposed view with 10yr tree growth

Source: Urbis

Figure 22 View 3 -West side of Huntingwood and Brabham Drive roundabout

Picture 14 View 3 -Existing view

Source: Urbis

Picture 15 View 3 -Proposed view

Picture 16 View 3 – Proposed view with 10yr tree growth

Source: Urbis

The photomontages show that in close views the proposed development will create significant visual change to the existing composition and character of views by replacing existing areas of open space and vegetation with built form and proposed planting. Notwithstanding this, the effects do not directly equate to a high level of visual impact particularly given the statutory context of the site allows for bulky warehouse forms and as such associated visual effects and impacts are contemplated by the controls.

The visual effects are typical of and not dissimilar in height, scale or character to others which exist in the immediate visual context of the site. In addition, the upper parts of the proposed built form are not dissimilar in height to the existing built forms on the site including the existing ingredient silos. Importantly, the proposed development does not block views to any scenic or important features, including to or from heritage items.

The continuous façade around the north-western corner of the site will in time include groundcover and creeping vegetation which will in effect create a virtual 'green wall". In addition, in time the dense screen planting that is proposed on the sloping berm will create significant screening effects in views as shown in **Picture 13** and **Picture 16**.

The VIA concludes that the proposed development can be supported on visual impacts grounds.

6.4.1. Mitigation Measures

Proposed visual impact mitigation in the form of tree planting across the site and the inclusion of partial green walls to the majority of the road frontages will in time further filter views to and reduce the visibility of the proposed development.

6.5. HAZARD AND RISK

A SEPP 33 Hazard Analysis has been prepared by Riskcon and is provided at **Appendix K**. The report provides an analysis of the proposal against the provisions of SEPP 33 and whether a further preliminary hazard analysis is needed. The analysis includes a review of the proposed quantity and type of Dangerous Goods (DGs) stored at the site as well as the amount of vehicle movements against the threshold quantities identified in the guidelines Applying SEPP 33.

The storage of DGs at the site were assessed against the SEPP 33 thresholds as outlined in **Table 15**.

Table 15 DG classes or materials stored and maximum quantities

Class	Description	Proposed Maximum Quantity	Threshold (kg)	Does SEPP 33 apply?
2.1	Liquefied Petroleum Gas	669kg	10,000	N
8	Sodium hydroxide solution	3,000kg	25,000	N

Source: Riskcon

Additionally, the expected transport movements of DGs would not be considered to exceed the transport thresholds.

As such, the identified proposed quantities for DGs did not exceed the SEPP 33 thresholds and the required separation distance from the site boundaries are satisfied. Subsequently, SEPP 33 does not apply to the project and a Preliminary Hazard Analysis does not need to be prepared.

6.5.1. Mitigation Measures

The following recommendations were made in regard to storing DGs as to minimise any hazard and risk:

- The documentation required by the Work Health and Safety Regulation 2017 applicable to a placard site shall be prepared and stored on file at the site.
- The appropriate placards for storages exceeding placard quantity as defined in the Work Health and Safety Regulation 2017 shall be affixed to the applicable storages.

6.6. FOOD SAFETY

The Arnott's Group standard for all their facilities is the Global Food Safety Initiative (GFSI), which is met through the The Safe Quality Food (SQF) Certification, audited annually by SGS Australia. The proposed new facility will fall under this standard and will require the implementation of The Arnott's Group Quality Management System policies and procedures, development of the associated Hazard Analysis Critical Control Point (HACCP) plans and finally audited to achieve SQF Certification prior to operation.

The SQF Certification aligns with the Australian Food Safety Standard (Chapter 3) but is a more stringent standard to achieve. Demonstration of the SQF Certification also satisfies the relevant NSW Food Authority standards.

Arnott's has confirmed that the proposed facility will not be used for activities that require a licence under the NSW *Food Regulation 2015*.

6.7. SOIL AND WATER

An Integrated Water Cycle Management Report (IWCM) and comprehensive Civil Engineering Package has been prepared by Sparks and Partners and is provided at **Appendix P**. The IWCM has been prepared to demonstrate that the development is able to provide and integrate water cycle management (WCM) measures into the stormwater management strategy for the site. The IWCM has had particular regard to the requirements outlined in the BDCP 2015 Part J Water Sensitive Urban Design (WSUD) and Integrated Water Cycle Management.

6.7.1. Stormwater Management

The proposed development requires the implementation of OSD as per the Blacktown City Council *Engineering Guide for Development* to control stormwater discharge from the site. The existing open space in the north-west corner of the site, which currently acts as an OSD basin will be replaced with an OSD tank below the basement car park. Sizing of the OSD systems has been completed using DRAINS modelling software for the 50% to 1% AEP storm for various durations. The IWCM confirms that all stormwater drainage as part of the proposed development has been designed in accordance with Council's Guidelines.

Stormwater runoff from the development will be collected within the proposed stormwater management system within the site and will be directed through several pollution treatment devices as detailed in the Civil Engineering Plans. Modelling of the proposed treatment measures has been undertaken using the MUSICX software package (Version 1.1.0). The modelling results of the water quality achieved for the site confirm that the development can achieve Council's requirements of 90% reduction in gross pollutants, 85% reduction in total suspended solids, 65% reduction in total phosphorous and 45% reduction in total nitrogen.

6.7.2. Water Balance

Water demands for irrigation and toilet flushing within the development will be met through the reuse of collected roofwater. The proposed development will capture roof water from part of the processing building roof area (12,232m²), which will be conveyed to an 95,000 litre tank for storage and reuse throughout the development.

The rainwater tank has been sized to ensure an approximate efficiency of 80.73% to address non-potable demand. This efficiency will result in an approximate reduction in the proposed demand on potable water supplies of 1,493,600 litres per year, which demonstrates a commitment to water recycling and minimising the usage of mains water.

6.7.3. Sediment and Erosion Control

Sediment and erosion control measures will be applied prior to the commencement of construction and maintained throughout construction. The measures will be in accordance with Council's requirements and the NSW Department of Housing Manual, *Managing Urban Stormwater Soil & Construction 2004 (Blue Book)*. A sediment and erosion control plan is provided with the Civil Engineering Package at **Appendix P**. Provided these measures are in place prior to construction, no adverse sediment and erosion impacts are anticipated.

6.7.4. Salinity

A Preliminary Salinity Investigation was undertaken by JK Environmental and is provided at **Appendix R.**

The investigation included soil sampling from six boreholes and installation of one groundwater monitoring well. The boreholes generally encountered silty clay fill overlying residual silty clay and siltstone bedrock. The monitoring well was found to be dry approximately six days after installation, therefore no groundwater sampling and analysis was undertaken.

The investigation encountered saline soils across the proposed development area with levels of salinity that varied with depth. Conditions were found to be mildly aggressive to buried concrete and steel. This information must be considered in the design of the footings and structures in contact with the soils.

6.7.4.1. Mitigation Measures

The investigation concluded that a Salinity Management Plan should be prepared in accordance with the amended Salinity Code of Practice to outline measures to be implemented to reduce the risks associated with salinity at the site.

6.7.5. Contamination

A combined Preliminary Site Investigation and Limited Detailed Site Investigation (DSI) has been prepared by JK Environmental and is provided at **Appendix S.**

The investigation identified the following potential contamination sources or area of environmental concern (AEC):

- Fill
- Fuel storage (in underground storage tanks (USTs))
- Historical agricultural use
- Use of pesticides
- Hazardous building materials

The historical assessment indicated that the site has been extensively used for agricultural/horticultural activities which are listed as activities that may cause contamination under SEPP 55. In addition, the historical presence of residential and agricultural structures on the site indicates that the potential for asbestos occurrence in the fill is relatively high.

Based on the analytical results, the contaminant levels in the samples analysed were below the adopted assessment criteria and therefore were not detected at concentrations that could pose a risk in the context of the proposed land use. On this basis, the investigation concluded that the site can be made suitable for the proposed development.

A Detailed Site Investigation (DSI) for the site will be undertaken prior to commencement of the development to establish whether the site is suitable in its current state without the need for remediation, or whether remediation is required.

6.7.6. Geotechnical

A Preliminary Geotechnical Investigation has also been prepared by JK Geotechnics and is provided at **Appendix Q**. The aim of the investigation was to provide preliminary information on the subsurface conditions for due diligence purposes and conceptual planning.

The Preliminary Geotechnical Investigation concludes that the major geotechnical constraints for the proposed development are the required excavation for the car park and presence of uncontrolled fill in the vicinity of the proposed processing building. Such uncontrolled fill is not suitable to support footings or floor slabs. Therefore, it has been recommended that the entire slab be designed as a fully suspended slab so that excavation and replacement of the existing fill is not required. Further geotechnical investigation will be carried out prior to the detail design of the development.

6.8. ECOLOGICAL SUSTAINABLE DEVELOPMENT

An ESD Report has been prepared by Northrop and is provided at **Appendix T.** The report outlines the energy efficiency measures adopted for the proposal to minimise greenhouse gas and carbon emissions, and provides an overview of how the proposal responds to sustainable planning through the integration of best practice design principles.

The expansion will also look to minimise the use of fossil fuels, in line with Arnott's commitment to becoming net-zero emissions by 2040. This will be supported by a transition plan and power purchase agreements, resulting in an elimination of Greenhouse Gas Emissions from the facility 10 years ahead of the Government's goal of net zero emissions by 2050.

A strong focus has been put on the effective management of water within the building with the following initiatives being included in the design in all areas throughout the project:

- Water Efficient fixtures and fitting will reduce the water consumption of the site.
- Water sensitive urban design with the external landscape design assisting to minimise water use for irrigation. The inclusion of landscaped area will also assist in the reduction of site stormwater discharge and assist in the management of the projects broader impact on urban stormwater flows.

- A large rainwater capture and reuse system installed to offset the site's water usage for washdown, cooling towers, toilet flushing and other facets of production. This system would have the ability to offset most of the site's potable water usage.

It is expected that these initiatives will reduce the sites potable water demand by more than 50% compared to a standard practice building.

6.8.1. Principles of ESD

There are four ESD principles defined by clause 7(4) of Schedule 2 of the EP&A Regulation that must be considered in the assessment of the proposal. These are addressed in **Table 16.**

Table 16 ESD principles assessment

ESD Principle	Response
Precautionary principle	The implementation of environmental management and an assessment of the building's operational maintainability, the project attempts to incorporate adaptability and resilience into the project design. The concepts behind the precautionary principle is to create spaces that can both; accommodate for changes, which may eventuate in the future, and avoid the risk of serious or irreversible damage to the environment.
Intergenerational equity	The inclusion of zero ozone depleting refrigerants, best practice PVC and low impact paints, sealants and adhesives, alongside a focus on providing greater vegetation and support for the buildings connection with nature, the project demonstrates a strong commitment to the preservation of environmental health, diversity and productivity of the local area.
Conservation of biological diversity and ecological integrity	The planting of native vegetation, improvement of stormwater runoff from the site and use of integrated landscaping, the project will act to improve, conserve and support the local biological diversity and integrity.
Improved valuation, pricing and incentive mechanisms	The design process should involve significant input from the Quantity Surveyor who will be involved to ensure that the project both remains on budget and effectively considers environmental factors in the valuation of assets and services. Furthermore, the project will look at maintainability and the operational costs associated with individual design initiatives and the overall design.

6.9. WASTE

A Waste Management Plan (WMP) has been prepared by FDC Construction Pty Ltd and is provided at **Appendix U.** The WMP identifies all potential waste likely to be generated by the proposed development during its demolition, construction and operational phases, including descriptions on how the waste is to be handled, processed, and disposed of, or re-used and recycled as consistent with Council requirements.

6.9.1. Construction Waste

Table 17 shows the estimated volume of garbage and recycling generated by the proposed demolition, construction works and subsequent operation.

Table 17 Expected waste generation – construction

Waste to be Generated	Estimated Volume - Construction
Excavation material	23,000m³ of imported fill
Green Waste	500m³
Concrete	100m³
Timber	20m³
Plaster board	50m³
General construction waste	500m³
Metals	20m³

Source: FDC Construction

Effective management of construction materials and construction and demolition waste, including options for reuse and recycling where applicable and practicable, will be conducted. Only wastes that cannot be cost effectively reused or recycled are to be sent to landfill or appropriate disposal facilities. Waste materials produced from demolition and construction activities are to be separated at the source and stored separately on-site before transport to waste facility.

6.9.2. Operational Waste

Arnott's is the operator of the existing and proposed food processing facility. Ongoing management of waste is a current requirement of the existing site that is managed by staff via existing private waste contracts. The ongoing waste management is proposed to continue under the same requirements, contracts and processes. The existing and proposed waste storage and collection areas for the operation of the facility is attached to this report.

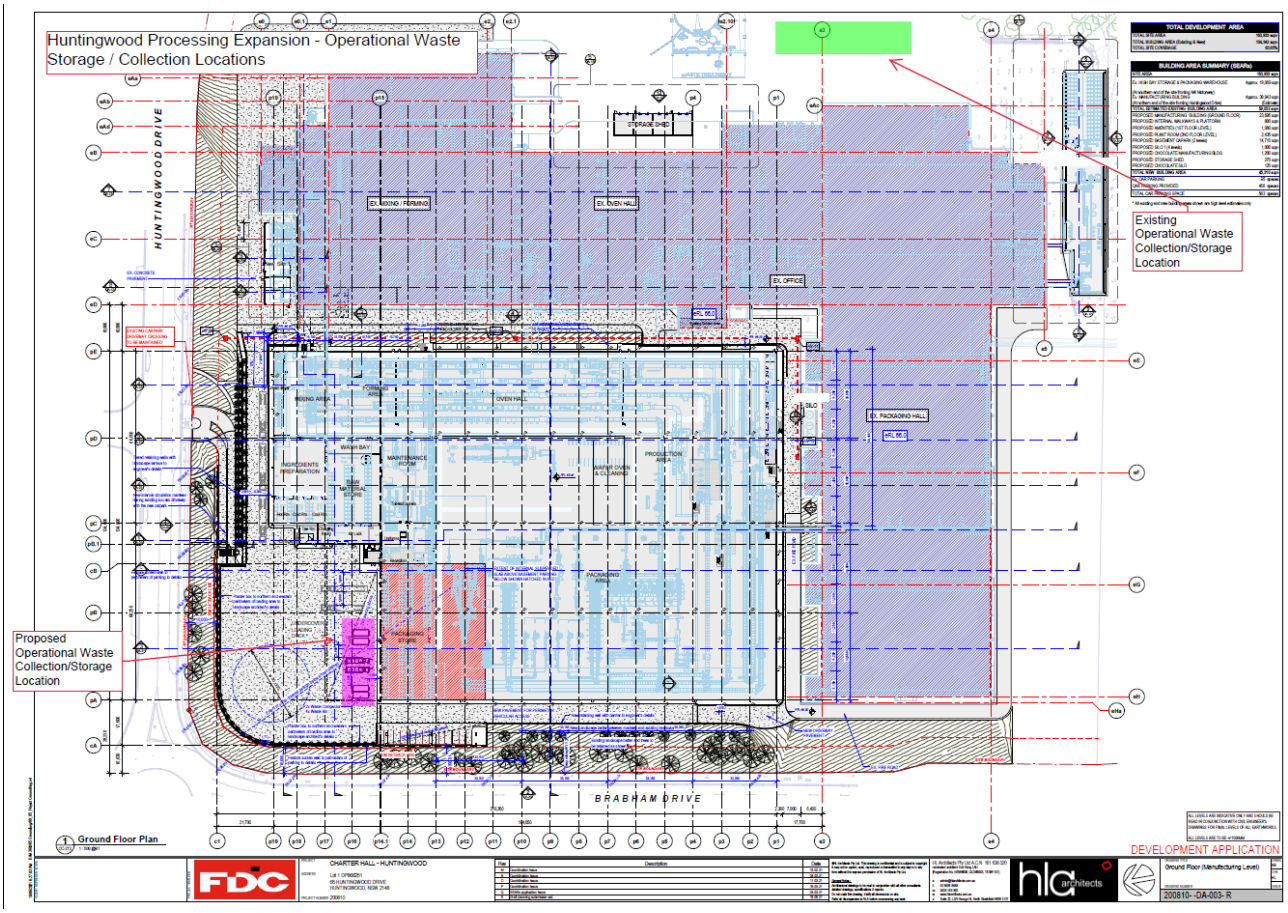
The predicted waste generation during the operation of the facility (including existing and proposed operations) is outlined in **Table 18**. The location of the existing and proposed waste collection areas are shown in **Figure 23**.

Table 18 Operational waste collection details (existing and proposed)

Expected waste type	Estimated quantity per week	On-site storage and treatment	Collection frequency
General waste	130m³	5 x 1.5m³ Bins 1 x 3m³ Hook Bins 2 x 30m³ Hook Bins 2 x 30m³ Compactors	Weekly
Comingled waste	2.5m³	Copactor	3x per week
Metal Waste	5m³	15m³ Steel bin	1x every 3 weeks
Cardboard	73m³	2 x 35m³ Compactors 1 x 3m³	Weekly
Hazardous waste	8m³	4 x 2m³ Marrell Bins 2m³ Grease trap	Weekly Quarterly

Source: FDC Construction

Figure 23 Waste collection points



Source: HLA Architects and FDC

6.10. INFRASTRUCTURE REQUIREMENTS

An Infrastructure Management Plan has been prepared by Northrop and is provided at **Appendix V.** The existing site infrastructure and the need for upgrades are summarised in **Table 19**.

Table 19 Existing and proposed infrastructure

Infrastructure	Availability
Electrical high voltage customer (HVC) services	The existing HVC is connected to three feeders from the Huntingwood zone substation and Arndell Zone Substation. Currently HVC is supplied by an active dedicated feeder, backup dedicated feeder to maintain redundancy and feeder used for network interconnection. It has been identified that a HVC upgrade or additional new dedicated feeder (subject to Endeavour requirements) may be required to support the proposed development. Provision of such requires further investigation of the current capacity of the existing HV network and future capacity to support the proposed utility works. Consultation with EE will continue during the detailed design stage.
Telecommunications	Shared NBN and Telstra ducts reticulate along Huntingwood Drive and Brabham Drive on the northern and southern verge. Telecommunications services will be provided to the proposed development via the existing private structured cabling system. Private communications services will be extended via a new fibre link from existing site distribution to the new

Infrastructure	Availability
	building. Incoming telecommunications infrastructure (NBN) will be maintained with main connection at existing site distributor.
Sewer	The existing site is bounded by Sydney Water sewer mains along the northern and western boundary of the site. Based on the preliminary review, the existing sewer main should be satisfactory to serve the proposed development. Due to the proposed building location, the proposed building will be located parallel to the existing sewer main, along the western boundary. Submission and approval would need to be submitted to Sydney Water, prior to commencement on site, as part of the building plan approval process with Sydney Water. This will be dealt with during design phase of the project.
Potable Water	The existing site is bounded by Sydney Water potable mains in Huntingwood and Brabham Drive. Currently the existing water meter connection would be off the main in Huntingwood Drive. Based on the preliminary review, the existing water main shall be satisfactory to serve the proposed development. A pressure flow statement a pressure flow statement has been received and it is expected that the necessary pumps could be incorporated into the hydraulic design to address the actual demand and pressure if required.
Gas	The existing site is bounded by Jemena gas mains in Huntingwood Drive and Brabham Drive. The main in Huntingwood and Brabham Drive. The existing site gas connection for the site is off Brabham Drive, located more to the southwest corner of the site. Final application will need to be made to Jemena subject to gas loads required for the proposed building development, to confirm final capacity of gas mains in the area.

6.11. BIODIVERSITY

A BDAR has been prepared by Ecological Australia and is provided at **Appendix W**. The BDAR describes the biodiversity values within the site, describes the impacts and outlines the measures to be taken to avoid, minimise and mitigate impacts to threatened species present within the site.

Due to the presence of planted native vegetation within the site, the BDAR was prepared under the streamlined assessment module for planted native vegetation consistent with Appendix D of the *Biodiversity Assessment Method* (BAM) 2020.

In summary, the BDAR included the following findings:

- The site and development footprint did not contain any naturally occurring or remnant native vegetation. This means that no Plant Community Types (PCTs) could be assigned to the vegetation present. The vegetation present contained a mix of planted native and non-native plants, located on soil that has been modified as a landscaped industrial development.
- The site contains land that has been modified through historic clearing, landscaping, maintenance and operation as an industrial site, as shown in **Figure 24**.
- There were few fauna habitat types present due to the modified and maintained nature of the development site. Fauna habitat features were limited within the development site. The vegetation within the study area contained nectar producing plants (Eucalyptus species) including winter flowering species

(*E. tereticornis*). These nectar producing species may provide foraging habitat for highly mobile species such as birds, microbats and flying-foxes.

- The native canopy within the development site may be used as potential seasonal foraging habitat for microbats.
- No trees appeared to have either potential nesting material or hollows suitable for either threatened fauna or prey items.
- There were no areas of rock outcrop, waterways, or coarse woody debris. This means that fauna habitats were highly limited and unlikely to support populations of any threatened fauna species.
- The buildings in the area affected by the proposal and the development footprint are unlikely to provide habitat for microchiropteran bats.
- The proposed development would not directly impact any remnant native vegetation or threatened fauna species. It will impact on 1.14 ha of planted native vegetation that provides occasional foraging habitat for threatened fauna species. Species credits are not required to offset the proposed impacts in accordance with Appendix D.2 of BAM 2020.

Figure 24 Vegetation zones and plots

Source: Ecological Australia

6.11.1. Mitigation Measures

The following mitigation measures have been outlined in the BDAR for the proposed development:

- Develop and implement a Construction Environmental Management Plan that includes:
  - Tree protection measures recommended in the Arboricultural Impact Assessment prepared by Truth About Trees (2021), consistent with Australian Standard AS4970-2009 Protection of Trees on Development Sites.
  - Soil erosion and sediment controls

6.12. REMOVAL OF TREES

An Arboricultural Impact Assessment (AIA) was undertaken by Truth About Trees and is provided at **Appendix X**. The report assesses the identified trees within the site which may be impacted by the proposal. The report details the condition of each trees and makes recommendations for removal or retention based on the proposed development. Of the trees nominated for retention, the report also assesses any potential impacts and mitigation measures to minimise or remove these impacts.

A total of 345 trees were surveyed and assessed for the report. The proposed development will require the removal of 260 trees, the majority of which are located along the entrance driveway from Huntingwood Drive and around the north-western boundary. The trees identified for removal are generally in the position of the new processing facility, car park and basement access ramp. As outlined in the AIA, whilst the trees when viewed collectively provide good amenity value for employees, when assessed individually, there were no trees which were deemed to be of high significance or retention value. Replacement tree planting throughout the broader site at a ratio of 1:1 is proposed as part of the new landscape strategy.

The remaining trees will be retained and protected during the duration of construction works and associated activities. The AIA outlines specific tree protection measures to assist with reducing disturbances to the retained trees. These tree protection measures are summarised in **Section 6.12.1**.

6.12.1. Mitigation Measures

Specific mitigation measures to protect the retained trees during the construction phase are summarised below:

- A project Arborist with a minimum of AQF Level 5 certification is to be appointed prior to site establishment, demolition, or any site activities.
- The project Arborist is to certify the installation of tree protection fencing, which is to be installed in the approximate locations as shown in Appendix 2 of the AIA and maintained in good order throughout the development process.
- Where works to modify the existing sewer manholes conflict with the TPZs of retained trees (#169 and #218), the excavation must be carried out using non-destructive means i.e hand-digging or vacuum excavation, under the direct supervision of the project Arborist.
- Any demolition, excavation or work activity within the TPZ of a retained tree is to be supervised and certified by the project Arborist.
- The supervising Arborist is to identify any significant tree roots which are present and ensure their protection.
- Tree roots greater than 40mm in diameter are to be retained and protected throughout the development.
- Tree roots less than 40mm in diameter may be severed cleanly by the project Arborist if deemed appropriate.
- All other tree protection measures must be installed and maintained in accordance with Appendix 2 of the AIA and AS4970-2009-The Protection of Trees on Development Sites.

6.13. HERITAGE

6.13.1. Aboriginal Cultural Heritage

An Aboriginal Objects Due Diligence Assessment prepared by Urbis as part of the initial Scoping Report and is provided at **Appendix Y.** This report was prepared to investigate whether the proposed development will have the potential to harm Aboriginal sites or archaeological resources that may exist within the subject area and inform the proposed development of any Aboriginal archaeological and heritage constraints.

The findings of this assessment concluded that:

- The site does not contain any previously registered AHIMS sites.
- The site does not contain any archaeologically sensitive landscape features as defined by the Cumberland Plain regional predictive model and the Due Diligence Code of Practice (DECCW, 2010).
- The site is highly disturbed resulting from land use activities, particularly the construction of the existing food processing facility.
- There are no heritage items listed within the site.
- The site has generally low potential for Aboriginal sites to occur.
- No Aboriginal sites were identified during the site survey.

As outlined in the correspondence from Heritage NSW that accompanied the SEARs, no further assessment of Aboriginal cultural heritage is required. Nonetheless, in order to respond to the SEARs and provide justification for the reliance on the previous heritage assessment, a statement has been prepared by Urbis and is also provided at **Appendix Y.**

6.13.2. Non-Aboriginal Cultural Heritage

The ADD prepared by Urbis (refer **Appendix Y**) also provides a high-level assessment of historical (built) heritage constraints for the site. The findings of this assessment concluded that:

- There are no heritage items listed in the subject area.
- There is a milestone, listed under the BLEP 2015 (Item No. I29) within proximity to the subject area, to the north.
- The Prospect Reservoir, to the south east of the subject area, is listed on the State Heritage Register (Listing No. 1370).
- Neither listed item will be impacted by the proposed development.
- The subject area does not fall within the area identified for potential archaeological significance on the Blacktown DCP 2015.

In summary the assessment identified no non-Aboriginal heritage constraints for the site.

6.13.3. Mitigation Measures

The following mitigation measures have been identified for the construction of the proposed development:

- Although considered highly unlikely, should any archaeological deposits be uncovered during any site works, a procedure must be implemented. The following steps must be carried out:
    a. All works stop in the vicinity of the find. The find must not be moved ‘out of the way’ without assessment.
    b. Site supervisor, or another nominated site representative must contact either the project archaeologist (if relevant) or Department of Premier and Cabinet (DPC) to contact a suitably qualified archaeologist.

c. The nominated archaeologist examines the find, provides a preliminary assessment of significance, records the item and decides on appropriate management, in conjunction with the RAPs for the project. Such management may require further consultation with DPC, preparation of a research design and archaeological investigation/salvage methodology and preparation of AHIMS Site Card.

d. Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required, and further archaeological investigation undertaken.

e. Reporting may need to be prepared regarding the find and approved management strategies. Any such documentation should be appended to this ACHAR and revised accordingly.

f. Works in the vicinity of the find can only recommence upon relevant approvals from DPC.

- In the unlikely event that human remains are uncovered during any site works, the following must be undertaken:

  a. All works within the vicinity of the find immediately stop.

  b. Site supervisor or other nominated manager must notify the NSW Police and DPC.

  c. The find must be assessed by the NSW Police, and may include the assistance of a qualified forensic anthropologist.

  d. Management recommendations are to be formulated by the Police, DPC and site representatives.

  e. Works are not to recommence until the find has been appropriately managed.

6.14. SOCIAL AND ECONOMIC IMPACT

An Economic Impact Assessment of the proposal has been prepared by Urbis and is provided at **Appendix Z**. The report confirms that the development will result in significant positive economic benefits for the local and broader community, leading to the creation of additional employment opportunities.

The proposed development will expand and leverage the capabilities of one of the most advanced food manufacturing facilities in Australia and accommodate Arnott's growing business. Specifically, the proposed development will accommodate up to 229 Full-Time Equivalent (FTE) jobs during the construction phase, and 273 direct FTE jobs once complete and fully operational. The project will stimulate local investment and contribute significant economic output and value add to the economy each year.

In addition to supporting additional employment and economic growth, the proposal will include the following economic benefits for Sydney and NSW more broadly:

- Assist in the recovery of the manufacturing industry in Australia, which has declined rapidly over the last 50 years. The proposed development is a key opportunity to increase on-shore manufacturing capabilities and help to boost Australia's food product exports.
- Supporting farmers across Australia by purchasing additional domestically produced agricultural products. The proposed development of the existing facility at Huntingwood will increase Arnott's Biscuits' food production capacity, and therefore increase their need for Australian agricultural products.

The EIA therefore concludes that the proposed development should be supported by an economic perspective.

6.15. ACCESSIBILITY

An Access Report has been prepared by Morris Goding Access Consulting and is provided at **Appendix AA.** The report considers the proposal's accessibility with reference to the BCA, *Disability (Access to Premises – Buildings) Standards 2010*, relevant Australian Standards and *Disability Discrimination Act 1992*. Based on the report, it is expected that the proposal can comply with relevant accessibility provisions, either by meeting the deemed-to-satisfy requirements or via a performance-based approach.

6.16. SUITABILITY OF THE SITE

The site is considered highly suitable for the proposed development for the following reasons:

- The proposed land use is permissible in the IN2 Light Industrial Zone and the development is consistent with the zone objectives as established in the BLEP 2015.
- The current site layout has been informed through an extensive development process that has considered site specific opportunities and constraints. This includes the availability of residual land within the site, existing plant and infrastructure, existing access to Huntingwood Drive, internal access arrangements and manoeuvrability landscaping/tree coverage implications, need for earthworks, construction feasibility, operational costs and efficiencies.
- The site benefits from proximity to existing road infrastructure, including significant freight corridors along the Great Western Highway, Westlink M7 Motorway, and the Western M4 Motorway
- The proposed development is entirely consistent with the surrounding context, which is characterised by industrial-scale warehouse buildings of varying height, bulk and scale.
- The site is located within an established industrial precinct and is well separated from residential and other sensitive uses to minimise adverse amenity impacts.

7. JUSTIFICATION OF THE PROJECT

This EIS has been prepared in support of SSD-17352813 to assess the environmental, social and economic impacts of the proposed Huntingwood Processing Expansion. The EIS has addressed the issues identified in the SEARs and has been prepared in accordance with Schedule 2 of the EP&A Regulation. For the reasons outlined in this EIS, the site is suitable for the proposed development for the following reasons:

The proposed development been assessed with regard to the matters for consideration under section 4.15 of the EP&A Act and the SEARs issued by the Secretary of DPIE. We conclude that the proposed development can be supported for the following reasons:

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

The proposal aligns with the strategic direction and objectives of the Region Plan and accompanying District Plan. The proposal will deliver an additional 43,625sqm of industrial floor space, which will support the retention and management of industrial land within Greater Sydney. The generation of additional employment for the Central City Region will also contribute to the 30-minute city vision set in the Region Plan.

The proposal satisfies the applicable local and state development controls:

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

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

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

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

- The proposal involves significant replacement tree planting of 265 trees to mitigate the loss of planted native vegetation and filter views to and reduce the visibility of the proposed development from the public domain.

The proposal is highly suitable for the site:

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

The proposal is in the public's best interest:

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

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

DISCLAIMER

This report is dated 14 September 2021 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 Pty Ltd **(Urbis)** opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Charter Hall Holdings Pty Ltd **(Instructing Party)** for the purpose of State Significant Development Application **(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).

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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.

URBIS