

Modification Application

Augusta Street Warehouse and Distribution Centre Mod 2

July 2026

Prepared for: The Trustee for Huntingwood Property Trust



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The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

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Executive Summary

This Modification Report has been prepared on behalf of The Trustee for Huntingwood Property Trust (**the Applicant**) in support of an application to modify Development Consent SSD-36138263 for the Augusta Street Warehouse and Distribution Centre.

The site is located at Augusta Street, Blacktown within the Blacktown local government area (**LGA**). The site is approximately 26.64 hectares in area, with access via Augusta Street which connects to Flushcombe Road to the west. Flushcombe Road intersects with the Great Western Highway, providing east-west access to the metropolitan road network.

The site is the subject of SSD-36138263, granted 17 December 2024, which approved the construction and operation of a warehouse and distribution centre comprising four warehouse buildings including one multi-level building with a total GFA of 134,565sqm, maximum height of building of 34.84 m, car parking, intersection and access works. On the 7 August 2025, the applicant lodged a Modification Application seeking changes to the architectural plans for Warehouses 3 and 4, associated with SSD-36138263, which was subsequently approved on the 23 October 2025.

This Modification Report describes the site and the proposed modifications now sought to the approved layout, provides relevant background information, and assesses the revised layout against the relevant legislation, environmental planning instruments and planning policies. The specialist technical studies provided in support of SSDA-36138263 have been updated where relevant to facilitate a detailed assessment of the potential environmental impacts of the modified proposal.

Built form modifications relate to Warehouses 1–4 only (no changes to Warehouse 5) and comprise minor changes to internal warehouse and office configurations, updates to the warehouse and office façade designs, awnings, external lighting, and the construction of a skywalk access between Warehouses 3 and 4.

Further, consent is sought for tree removal, and earth works within the road reserve of the Great Western Highway and along the northern portion of the site within the site boundary. These works are required to facilitate approved upgrade works for the Flushcombe Road / Great Western Highway intersection, the design of which at the time of the original consent were conceptual in nature. Further roadworks design refinement by TfNSW to include a shared pedestrian path (and resultant change in embankment location and extent) now requires an updated civil design and tree removal approach which is reflected in this modification application.

The key issues for all components of the project as modified 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 remain consistent with that for which consent has already been granted. Additionally, this Modification Report confirms that the changes do not result in any additional impacts beyond those already considered for the site.

The project as modified 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:**

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

- **The proposal satisfies the applicable local and state development controls:**

The proposal is permissible with consent and meets the relevant statutory requirements of the relevant environmental planning instruments, including:

- Biodiversity Conservation Act 2016 (**BC Act**)
- Roads Act 1993 (**Roads Act**)
- Environmental Planning and Assessment Act 1979 (**EP&A Act**)
- Environmental Planning Assessment Regulation 2021 (**EP&A Regulation**)
- State Environmental Planning Policy (Planning Systems) 2021 (**Planning Systems SEPP**)
- State Environmental Planning Policy (Resilience and Hazards) 2021 (**R&H SEPP**)
- State Environmental Planning Policy (Transport and Infrastructure) 2021 (**T&I SEPP**)
- State Environmental Planning Policy (Biodiversity and Conservation) 2021 (**B&C SEPP**)
- State Environmental Planning Policy (Industry and Employment) 2021 (**I&E SEPP**)
- **The design responds appropriately to the opportunities and constraints presented by the site:**
 - The proposal does not result in additional environmental impacts above those anticipated under SSDA-36138263 and remains suitable for the site in the context of the surrounding locality.
- **The proposal is highly suitable for the site:**
 - The proposed land use remains permissible with consent in the IN1 General Industrial zone under the I&E SEPP, while also remaining consistent with relevant State and local strategic and statutory policy. The site is well connected to the motorway network of Western Sydney, being adjacent to the Great Western Highway, Prospect Highway, and M4 Motorway. As is discussed in greater detail within this Modification Report, the proposal as modified remains substantially the same as the development for which consent was previously granted, thus remaining highly suitable for the site.
- **The proposal is in the public interest:**
 - The proposal as amended will support the delivery of the warehouse and logistics estate envisaged under SSD-36128263, with a more refined outcome resulting from market demand. This will address the under supply and heightened demand for warehousing and distribution facilities in NSW, particularly Western Sydney.

Having considered all relevant matters, the development as modified has significant merit and should be approved subject to the implementation of the updated mitigation measures described in this report and supporting documents.

1 Introduction

1 Introduction

This Modification Report has been prepared by Urbis Ltd (**Urbis**) on behalf of The Trustee for Huntingwood Property Trust (**the Applicant**) pursuant to section 4.55(1A) of the Environmental Planning and Assessment Act 1979 (EP&A Act). The application seeks to modify Development Consent SSD-36138263 for the Augusta Street Warehouse and Distribution Centre, hereafter referred to as Mod 2.

1.1 Applicant Details

The applicant details for the proposed modification are listed in the following table.

Table 1 Applicant Details

Descriptor	Proponent Details
Full Name(s)	ESR Developments (Australia) Pty Ltd on behalf of The Trustee for Huntingwood Property Trust
Postal Address	Level 13, 39 Martin Place Sydney NSW 2000
ABN	Huntingwood – ABN 65 452 171 423
Nominated Contact	Will Dwyer

1.2 Project Background

1.2.1 Approved Development

The proponent lodged an Environmental Impact Statement (**EIS**) with DPHI in September 2023 to SSD-36138263 (**the original SSDA**). The SSDA sought development consent to construct and operate a 24/7 warehouse and distribution centre comprising five warehouse buildings (including one multi-level building) and 15 separate tenancies at Augusta Street, Blacktown within the Blacktown local government area (**LGA**).

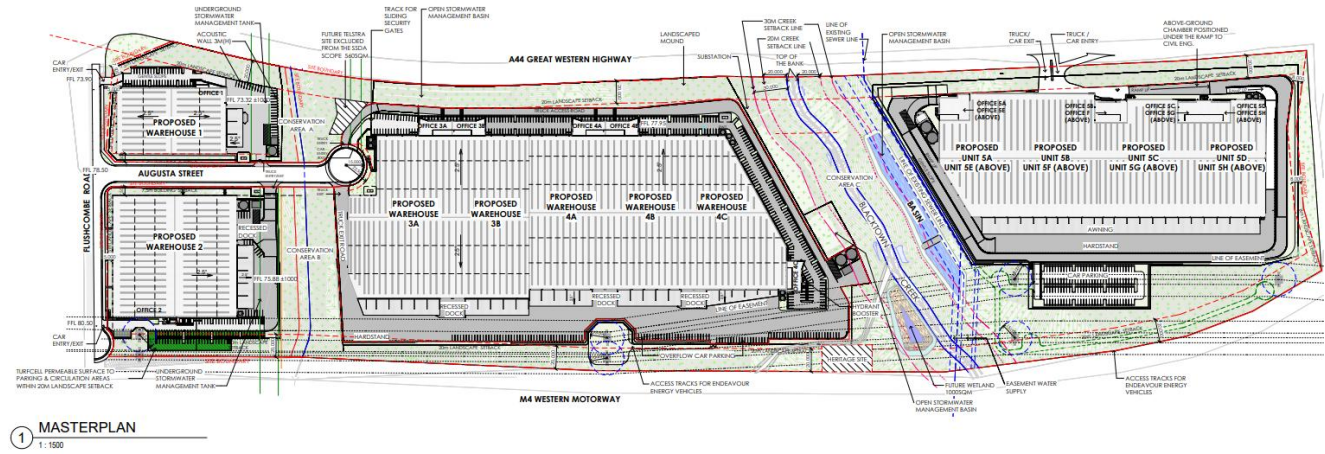
The development had a capital investment value (**CIV**) of \$446 million and expected to generate up to 651 construction jobs and 908 operational jobs. The development was proposed to support the demand for freight and logistics development within Western Sydney and allow for the creation of operational jobs in a core employment area of Western Sydney.

The Acting Director, Industry Assessments, under delegation from the Minister for Planning and Public Spaces, approved the original SSDA on 17 December 2024, for:

“Construction and operation of a warehouse and distribution centre comprising of four warehouse including one multi-level building, 15 warehouse tenancies including fitout, subdivision, car parking, landscaping, local road upgrades to Flushcombe Road, Augusta Street, and State intersection upgrades to Greater Western Highway / Flushcombe Road and Great Western Highway / Prospect Highway.”

The approved masterplan is shown in the Figure below.

Figure 1 SSD-36138263 Original SSDA Approved Layout



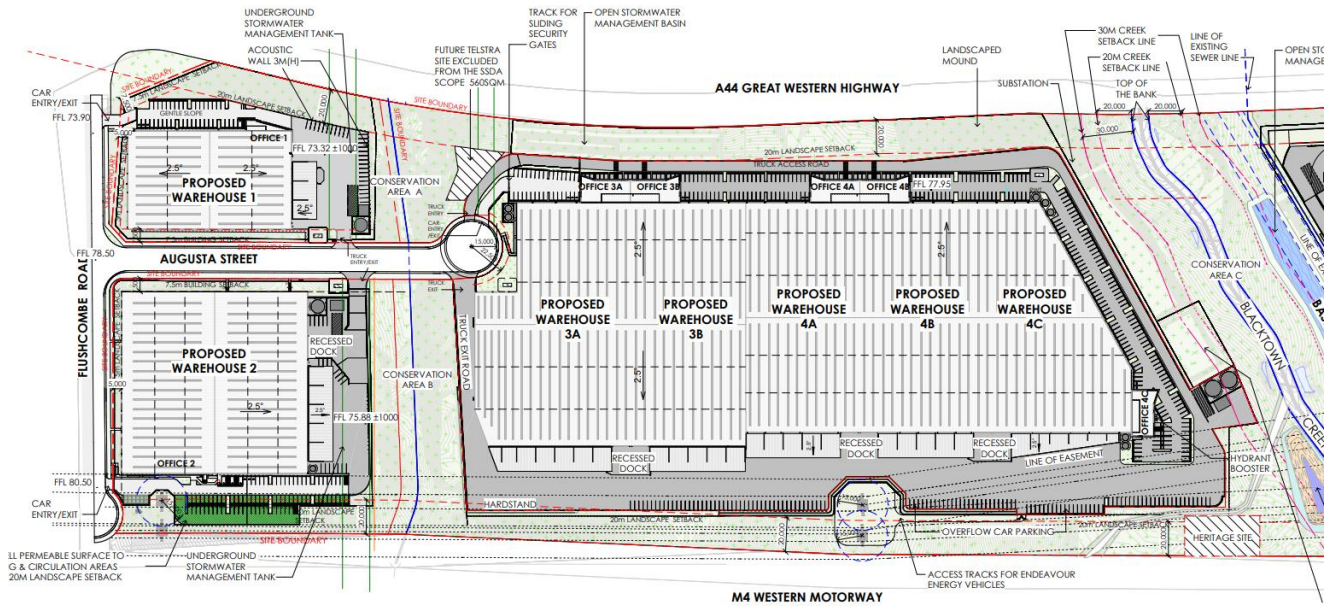
Source: Pace Architects

On the 7 August 2025, the applicant lodged a Modification Application seeking changes to the architectural plans associated with SSD-36138263, including:

- Amendments to built form, levels, and finishes.
- Additional works arising from TfNSW review of approved road works concepts, and redesign requirements to show the length of road works and sections (approved v proposed).
- Modifications to the layout of Warehouse 3 and 4 to convert from a single building into two separate structures with an access road in between.
- Minor adjustments to Gross Floor Area (GFA) distribution and the calculation of GFA, resulting in a minor overall increase of + 191sqm. This is the result of introducing an undercroft car park.
- Minor adjustment to the access road at end of Augusta Street.
- Minor adjustment to the proposed pad levels for warehouse 3 and 4, with an increase of 0.9m, and for warehouse 5, with an increase of 1.1m, resulting from the introduction of undercroft parking discussed below.
- Introduction of under croft parking area under the northern end of buildings 3 and 4, and removal of at grade parking areas previously located along the northern façade of the buildings.

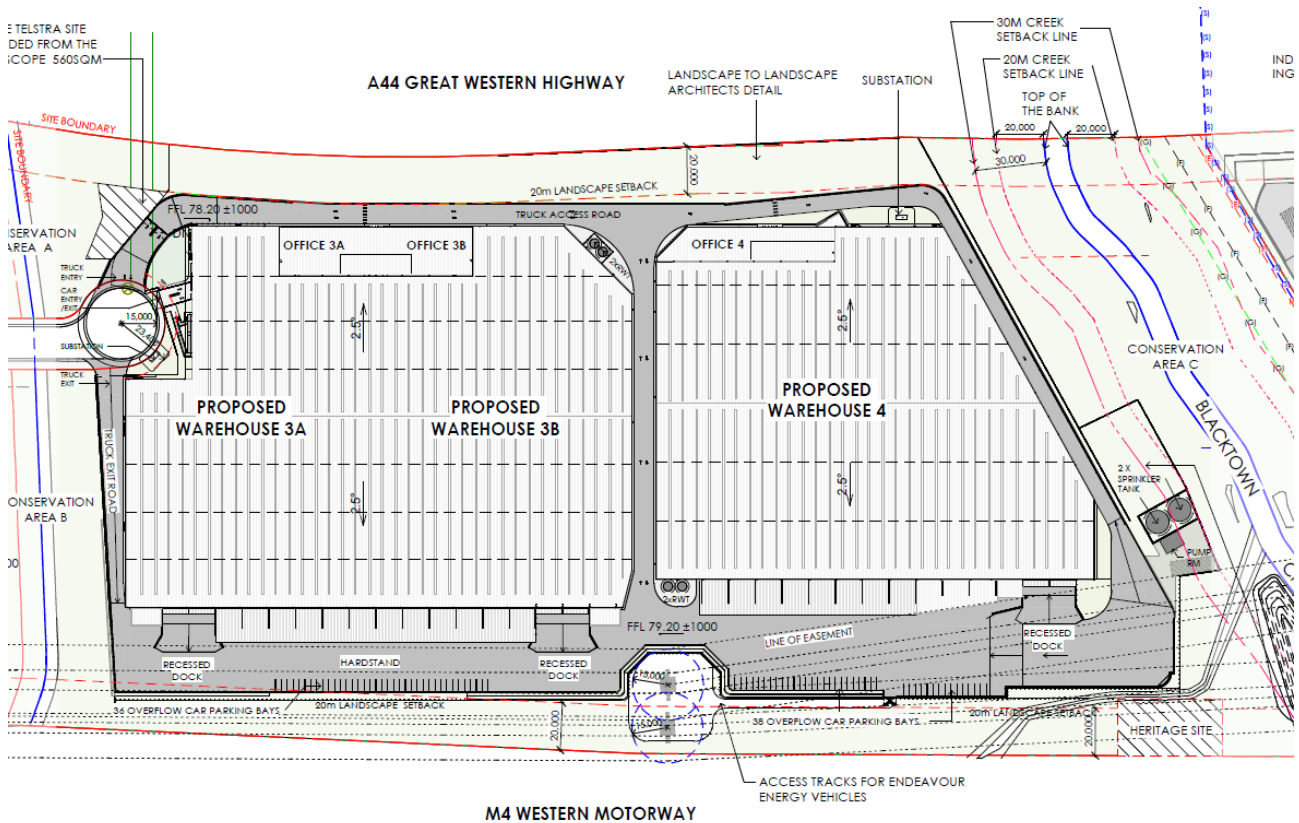
There were no changes to watercourse remediation works as part of the modification application. The approved design and flood assessment for Blacktown Creek and the unnamed western watercourse remained consistent with the approved SSD. These changes for which consent were sought are shown in the Figures below.

Figure 2 Originally Approved Layout Warehouse 3 and 4



Source: Pace Architects

Figure 3 Approved Layout Warehouse 3 and 4 Mod 1



Source: Pace Architects

The Acting/Team Leader, Industry Assessments, under delegation from the Minister for Planning and Public Spaces, approved MOD1 on 23 October 2025, for:

“Modification to change the layout of the development by separating warehouse 3 and 4 into separate warehouse buildings, with associated changes to the gross floor area, building height, site levels and landscaping.”

1.3 Project Overview

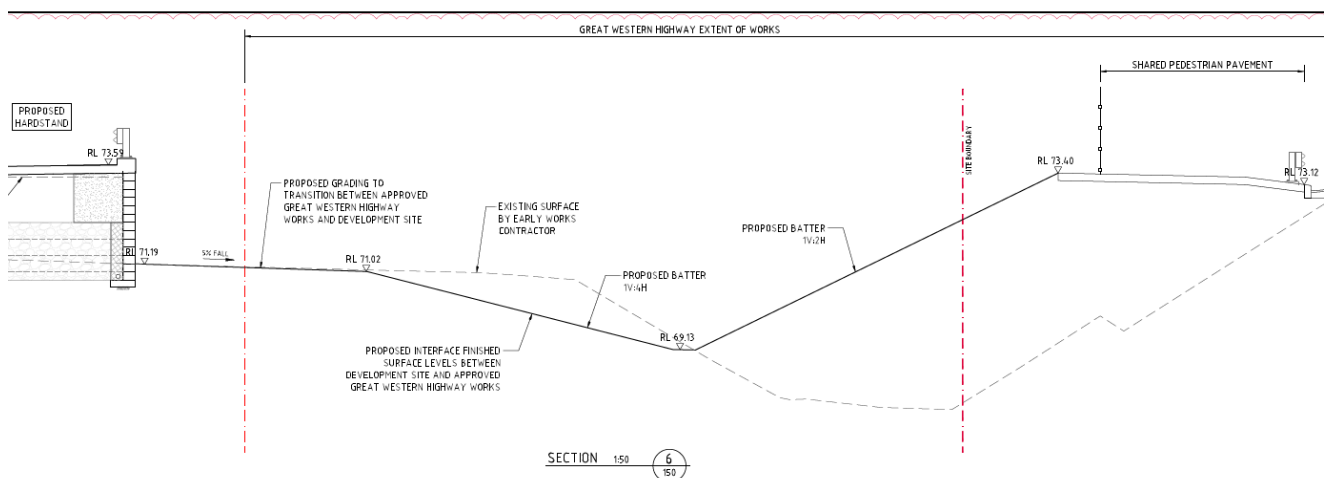
The proponent has undertaken a detailed review of the original development consent (as amended by MOD 1) and identified the need for further minor modifications. The changes are described under two key headings:

- Built form modifications relate to Warehouses 1–4 only (no changes to Warehouse 5) and comprise minor changes to internal warehouse and office configurations, updates to the warehouse and office façade designs, awnings, external lighting, estate signage and the construction of a skywalk access between Warehouses 3 and 4.
- Further, consent is sought for tree removal and civil works along the site's northern boundary opposite warehouses 1–4, and within the road reserve of the Great Western Highway to facilitate refined design to the approved upgrade works for the Flushcombe Road / Great Western Highway. More specifically, these tree removal and civil works will enable the delivery of a shared pedestrian pathway and slip lane resulting from conditions B6 to B12 on the overarching consent which requires ESR to enter into a Works Authorisation Deed (**WAD**) with TfNSW for all civil works associated with the access road connection to the highway.

Since the final s138 Approval, the road work design has been refined by TfNSW to include a changed earthworks extent and delivery of a shared path, which is now reflected in the WAD. . Figure 4 below shows a section demonstrating the extent of earthworks change.

The land use as approved by the original development consent (a warehouse and distribution centre) will remain the same.

Figure 4 Proposed Section (Existing and Proposed Surface Levels)



Source: Costin Roe Consulting, 2026

2 Strategic Context

2 Strategic Context

This section describes the way in which the modified proposal addresses the strategic planning policies relevant to the site. Given the minor scale of the proposed changes, it is noted that the project's strategic context remains consistent with the previously provided assessment submitted and approved under Mod 1.

2.1 Project Justification

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 Western Parkland City, Central River City and Eastern Harbour City. It identifies key challenges facing Sydney including increasing the population to eight million by 2056, requiring 817,000 new jobs and 725,000 new homes by 2036.

The site is within the Blacktown Local Government Area (LGA) which is instrumental to contributing to the productivity of both the Central and Western Cities. The District Plan identifies planning priorities for the Central City District that build on the Region Plan's objectives. The following apply to the subject site:

- Planning Priority C10: Growing investment, business opportunities and jobs in strategic centres.
- Planning Priority C11: Maximising opportunities to attract advanced manufacturing and innovation in industrial and urban services land.
- Planning Priority C13: Protecting and improving the health and enjoyment of the district's waterway.

The proposal will promote a competitive and efficient freight and logistics network which benefits from excellent regional connections (Objective 16 & 17) and will ensure the appropriate use of approved industrial land to promote business activity in Western Sydney (Objective 22).

The proposal will contribute investment and new business opportunities in strategic centres and will contribute to meeting the jobs target for Blacktown LGA. A higher target of 19,500 jobs by 2036 is established for the Blacktown LGA. The proposal has the capacity to maximise opportunities to attract advanced manufacturing and innovation in industrial land.

2.1.2 Our Greater Sydney 2056: Central City District Plan

The Central District Plan (**District Plan**) is a 20-year plan to manage growth in the context of economic, social and environmental matters to implement the objectives of the Greater Sydney Region Plan. The intent of the District Plan is to inform local strategic planning statements and local environmental plans, guiding the planning and support for growth and change across the district.

The District Plan contains strategic directions, planning priorities and actions that seek to implement the objectives and strategies within the Region Plan at the district-level. The Structure Plan identifies the key centres, economic and employment locations, land release and urban renewal areas and existing and future transport infrastructure to deliver growth aspirations. It recognises the importance of industrial land supply within the Central River City and the Blacktown LGA, noting:

"In Blacktown Local Government Area, a major industry cluster of transport and logistics, storage, warehousing and distribution is developing. This cluster, together with more established industrial precincts, will capitalise on the growth of the Western Parkland and Central River cities."

The proposal is consistent with the objectives and outcomes identified in the Central City District Plan and will provide for development that addresses the plan's priorities. The proposal will result in increased investment, business opportunities and jobs through the provision of general industrial and light industrial uses with good access to transport infrastructure.

2.1.3 Blacktown Local Strategic Planning Statement

The Blacktown Local Strategic Planning Statement 2020 (**LSPS**) provides a land use vision for Blacktown City and sets out how growth and sustainability will be managed over a 20-year period. Growth is to be balanced alongside the need to protect the local environment and in the context of there being adequate infrastructure to support development.

The site is located within the Blacktown Precinct identified within the LSPS. The Productivity Priorities for the Blacktown Precinct provide for industrial activity to be concentrated around the M4 Motorway in the Western Sydney Employment Area, the Blacktown Motorsports Precinct and Seven Hills. The LSPS also recognises the importance of the employment lands and freight networks to deliver jobs and investment opportunities for large national and multinational companies. Considering this, the LSPS nominates the following planning priorities:

- D7: Jobs and skills for the city – Creating the conditions for a stronger economy.
- LPP9: Maximising opportunities to attract advanced manufacturing and innovation in industrial and urban services land.

The proposed development continues to represent a major investment from the Applicant, and significant employment creation within the Blacktown LGA once occupied by future tenants, in a manner that reflects market demand and the ability to deliver on job creation. Accordingly, the proposal will contribute to creating conditions for a stronger economy.

2.1.4 Draft Sydney Plan

The Draft Sydney Plan, once finalised, will replace the Greater Sydney Region Plan – A Metropolis of Three Cities (2018) and address strategic growth in Sydney over the next 5 to 20 years. The plan will establish priorities as well as specific policy and planning responses to the key challenges and opportunities identified for the Sydney region. This proposal, although a minor modification, will assist in meeting Response 8, which seeks to secure an ongoing pipeline of productive industrial lands.

2.1.5 Future Transport Strategy 2056

The Future Transport Strategy sets the 40-year vision and strategy for managing the growth of transport services and infrastructure in NSW over the next 40 years. It has been developed alongside the Region Plan to provide an integrated planning framework for NSW that supports the repositioning of Sydney as a metropolis of three cities.

Transport for NSW has established six outcomes for Greater Sydney which demonstrate its aspirations for transport over the next 40 years. These outcomes will be used to guide transport services and infrastructure in Greater Sydney to 2056. The relevant Greater Sydney outcomes include:

- Successful places
- A strong economy
- Safety and performance
- Accessible services
- Sustainability

The proposal remains consistent with the strategic outcomes identified in Future Transport Strategy 2056 as it will connect a large format industrial business hub to existing transport networks. It will also enable utilisation of new technological advances in transport specific to warehouse land uses.

The site is adjacent to an established cluster of similar land uses with existing connectivity to the local road network, the M4 and M7 transport corridors. It is expected the primary land uses will relate to freight delivery, management and logistics and associated business services that will be highly adaptable to future transport technological advances. The current proposal includes appropriate facilities to enable access by alternative transport means including bicycle infrastructure.

2.2 Key Features of Site and Surrounds

2.2.1 Site Description

The site is described in the below table.

Table 2 Site Overview

Matter	Description
Project	Augusta Street Warehouse and Distribution Centre
Country	Gadigal
Street address	Augusta Street, Blacktown
Legal description	Lots 11, 12 and 14 Deposited Plan 1321460 Lot 164 Deposited Plan 8716 Lots 22–23 Deposited Plan 1321597 Great Western Highway Road Reserve (immediately north of the development site)
Site area	26.64 ha
LGA	Blacktown City Council
Existing development	In accordance with the original SSDA approval, demolition, clearance works, and bulk earthworks have commenced on the site. Blacktown Creek runs north–south through the central part of the site with riparian vegetation along the corridor. A drainage swale runs through this western portion of the site. A Telstra mobile telecommunications facility is located at the end of Augusta Street road reserve towards the Great Western Highway. Electrical transmission lines (and towers) run along the southern boundary, noted on title as an electrical easement.
Land configuration	The site comprises approximately 26.64 hectares of industrial zoned land. The consolidated parcel comprises a generally rectangular shaped lot, with the Augusta Street running through the centre from the west. The site topography is influenced by Blacktown Creek and the drainage swale to the west. The southeastern part of the site sits above the Prospect Highway, with a landscaped embankment impeding views from the east.
Surrounding land uses	The surrounding locality is described below: ▪ North: The site adjoins the Great Western Highway. The land further to the north primarily comprises residential development including detached single and double storey dwellings. Blacktown Creek and Timbertop Reserve are also located to the north, surrounded by residential development. ▪ East: The land immediately to the east of the site is vacant and comprises a landscaped mound separating it Prospect Highway. St Bartholomew's Church and Cemetery is located on the eastern side of Prospect Highway. ▪ South: The M4 Motorway runs along the southern boundary of the site, with existing trees providing visual screening of the site. The land on the

	opposite side of the Motorway comprises recreational and entertainment facilities in the form of a water park and a drive-in movie theatre. ▪ West: The land to the west comprises an animal holding facility and a modern logistics facility, characterised by large warehouse buildings. Further west is industrial zoned land within the Huntingwood area.
Site access and road network	The site is accessible from Augusta Street which connects to Flushcombe Road to the west. Flushcombe Road intersects with the Great Western Highway, providing east-west access to the metropolitan road network, with all left/right movements available via the existing signalised intersection.
Infrastructure	High voltage power lines are along the southern boundary. A Sydney Water sewer line runs north to south adjacent to the Blacktown Creek watercourse. The site is located within close proximity to the M4 Western Motorway, the Great Western Highway, Reservoir Road, and the Prospect Highway, providing excellent access to the local and regional road transport network. The site is also located 1km north of the heritage-listed Prospect Reservoir which supplies Sydney with water collected from the Illawarra Plateau. The closest public transport is a bus stop approximately 700m north on Flushcombe Road providing the 722 bus service to Blacktown Station.
Services	Potable Water ▪ An existing 100mm water main runs along Augusta Street. Electricity ▪ Endeavour Energy currently have seven 132kV transmission towers located within an easement along the southern boundary of the site. Telecommunications ▪ A Telstra mobile telecommunications facility is located at the end of Augusta Street road reserve towards the Great Western Highway. Gas ▪ A 210kPa gas reticulation system exists within Flushcombe Road. This main connects to gas reticulation within the residential district of Prospect on the northern side of the Great Western Highway. ▪ This gas main appears to have been used to service the now-redundant Red Lea poultry processing plant.
Contamination	A Remediation Action Plan (RAP) was approved with SSD-36138263, and mitigation measures for remediating the contaminated land onsite provided. The RAP identified the site as requiring Category 2 remediation works which can be undertaken as exempt development. As such, the scope of remediation works was not included in the SSDA, and no further consideration of contamination is required under this modification (MOD2).
Stormwater and flooding	The site is bisected by Blacktown Creek in the eastern portion of the site and a drainage swale along the western portion of the site, both of which flow south to north and via existing culverts under the Great Western Highway. Previous flood studies confirm the site accommodates a major overland flow path in the 1% AEP flood event and more intense storm events, conveying water from upstream catchments to the south towards Parramatta River.
Bushfire prone land	The northern boundary of the site is affected by a Bushfire Zone Buffer.

Biodiversity

Conservation areas are located through the central part of the site along Blacktown Creek. Additional natural vegetation is located in the north-eastern corner and along the southern boundary.

Aboriginal heritage

As detailed in the Aboriginal Cultural Heritage Assessment Report (**ACHAR**) submitted with the original SSDA, the site is identified as having two Aboriginal archaeological sites, an isolated stone artefact and a surface stone artefact scatter. Both sites were recorded in disturbed contexts and are not associated with any subsurface archaeological deposits.

European heritage

As detailed in the Heritage Impact Statement submitted with the SSDA, the site does not have any items of heritage significance nor is it within a heritage conservation area. Two remnant features of the site's history remain, although modified, including a 1920s house and open semi-rural landscape.

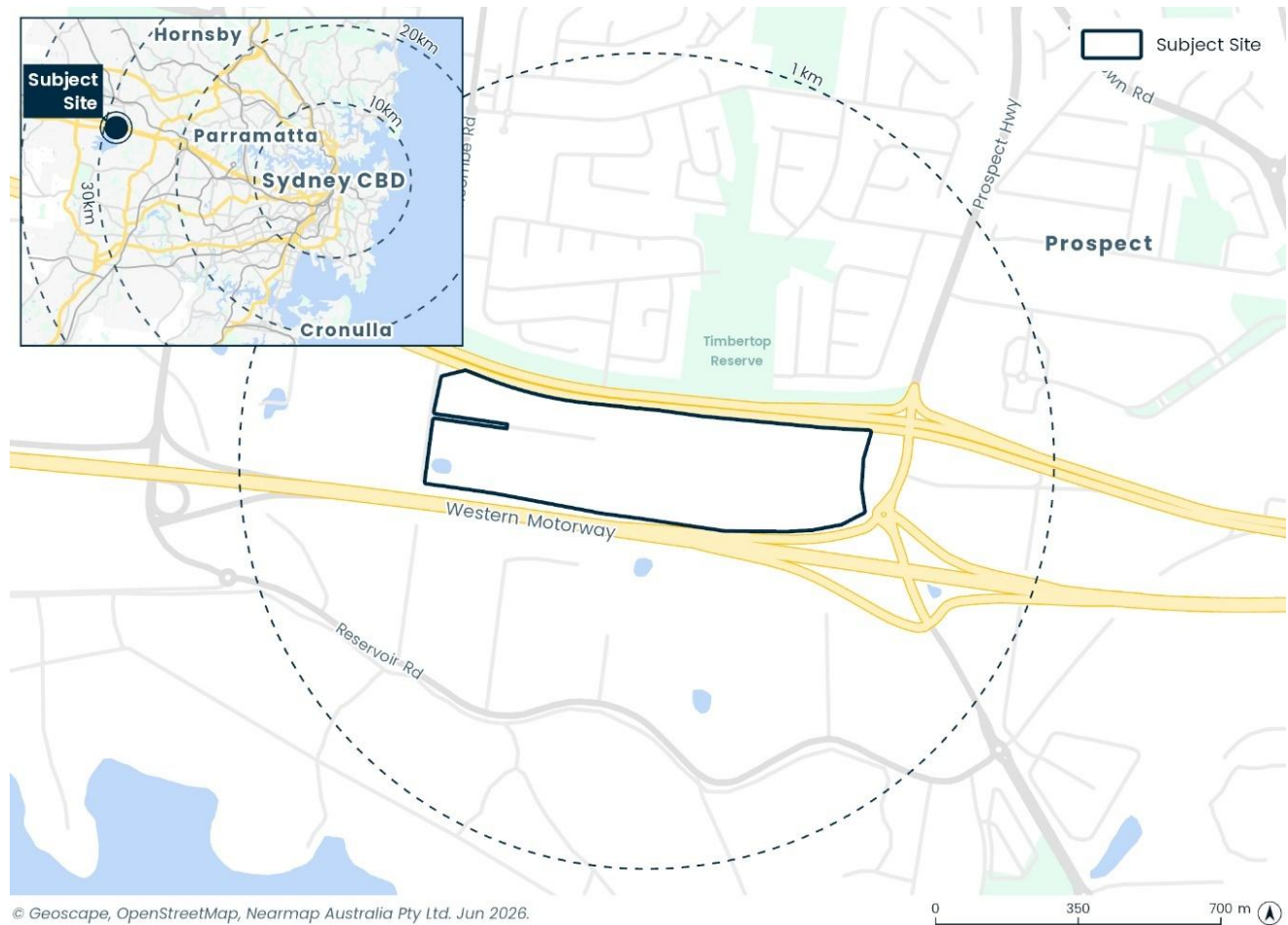
The nearest item is the State heritage listed St Bartholomew's Church and Cemetery (SHR No.00037) on the eastern side of the Prospect Highway.

Figure 5 Site Location



Source: Urbis, 2026

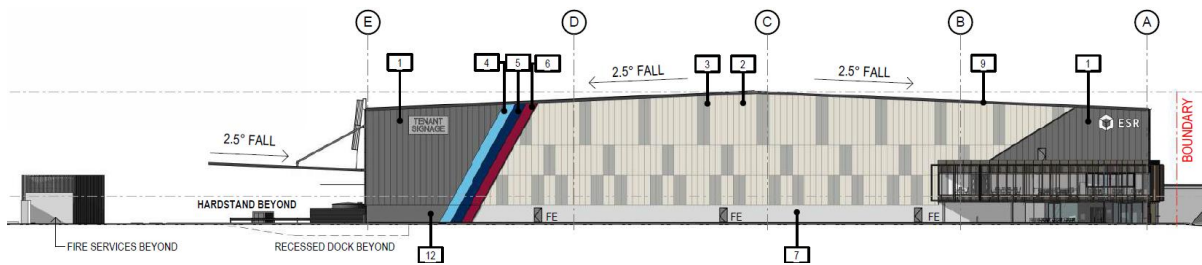
Figure 6 Site Context



Source: Urbis, 2025

3

Describe the Modifications

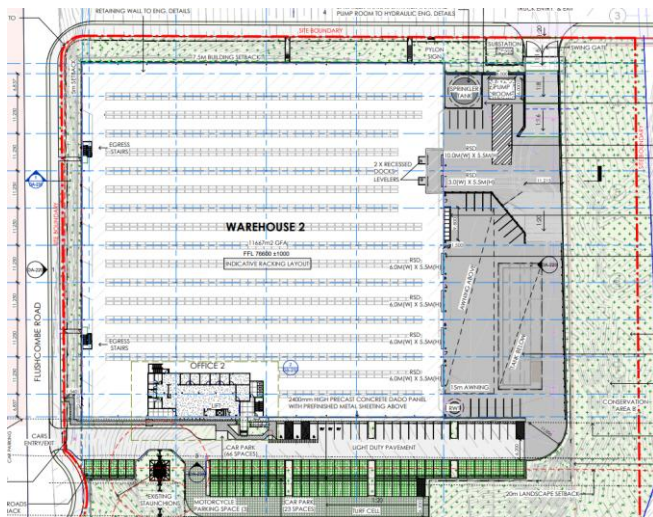


Source: SBA Architects

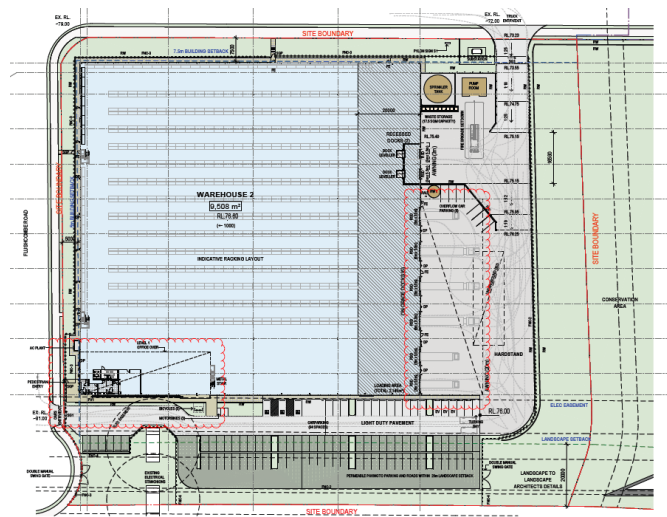
3.1.2 Warehouse 2

- Relocate office within the building from ground level to mezzanine level.
- Provide two additional loading docks and roller shutter doors on eastern façade, and relocation of rainwater tank.
- Extend hardstand awning on eastern façade from 15 to 20 metres.
- Additional overspill car parking (an additional 9 car parking spaces) and change to landscaped area.
- Changes to external façade materiality, colours, and signage.
- Introduction of external warehouse lighting.

Figure 9 Warehouse 2 Proposed Changes (Approved v Proposed)



Source: SBA Architects



Source: SBA Architects

3.1.3 Warehouse 3 and 4

- Revise undercroft car parking arrangements.
- Changes to external façade materiality, colours, and signage.
- Construct sky bridge to provide pedestrian access between Warehouse 3 and 4.

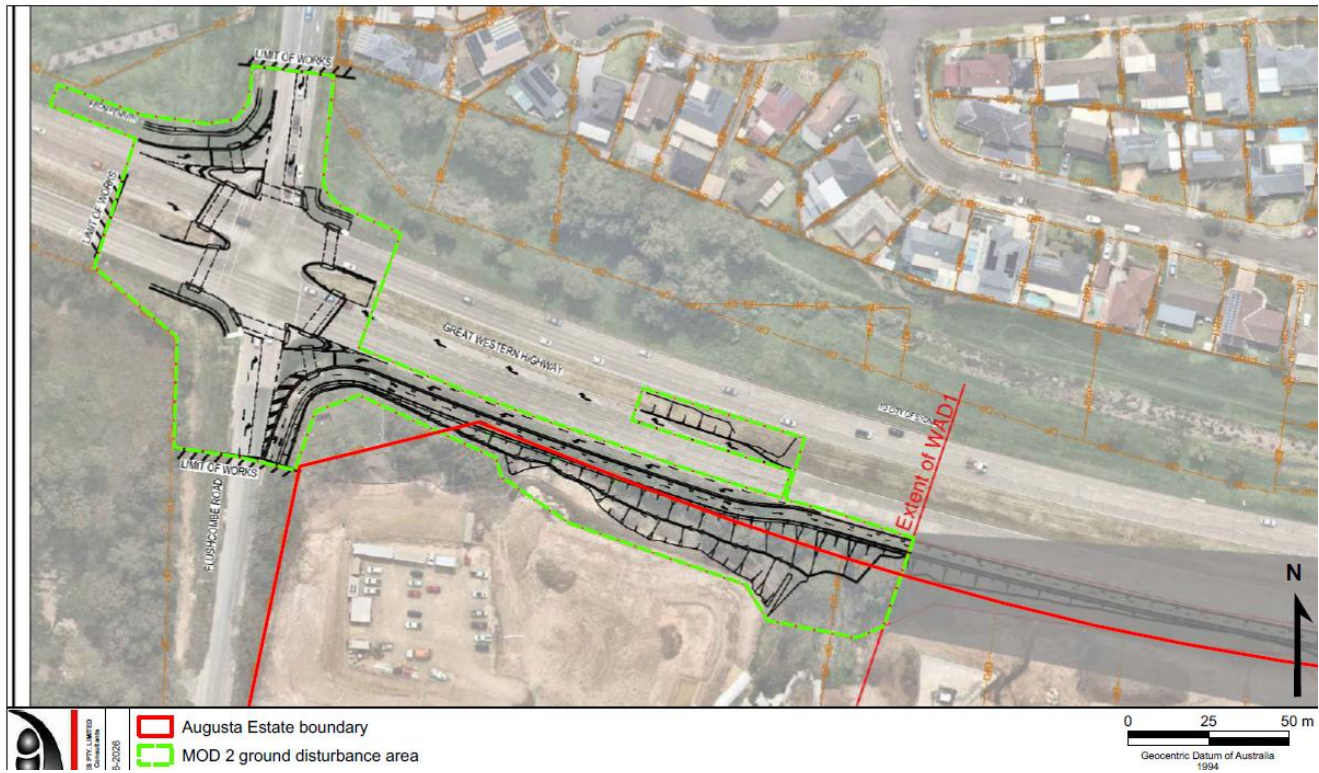
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the access road connection to the highway. Due to significant level differences, the delivery of the path has resulted in the need for earthworks and tree removal within both the road carriageway and within the site's northern edge. The proposal has been carefully considered and delivers at minimum a new 3:1 batter, which seeks to minimise ground disturbance, and enable suitable replanting once established.

The tree removal area is shown outlined green in the image below, noting the black linework depicts earthworks extents.

Figure 12 Proposed Tree Clearing



Source: Anne Clements & Associates, 2026

3.2 Summary Comparison with Original Consent

A comparative analysis has been undertaken of the proposed changes to the approved development in **Table 3** and is in accordance with the relevant criteria listed in the *DPIE State Significant Development Guidelines – preparing an environmental impact statement*.

Table 3 Comparative Task

Element	Approved Project	MOD 1	MOD 2	Overall Variance
Physical Layout and Design				
GFA	Warehouse 1	Warehouse 1	Warehouse 1	Warehouse 1
	Warehouse: 5,536sqm	Warehouse: 5,536sqm	Warehouse: 4,460sqm	Warehouse: - 1,076sqm
	Office: 399sqm	Office: 399sqm	Office: 436sqm	Office: +37sqm
	Warehouse 2	Warehouse 2	Warehouse 2	Warehouse 2

	Warehouse: 11,668sqm	Warehouse: 11,668sqm	Warehouse: 9,509	Warehouse: - 2,159sqm
	Office:363sqm	Office:363sqm	Office: 502sqm	Office: +139sqm
	Warehouse 3	Warehouse 3	Warehouse 3	Warehouse 3
	Warehouse: 21,436sqm	Warehouse: 28,230sqm	Warehouse: 28,074sqm	Warehouse: +6,638sqm
	Office: 964sqm	Office: 1,856sqm	Office: 1,540sqm	Office: +576sqm
	Warehouse 4	Warehouse 4	Warehouse 4	Warehouse 4
	Warehouse: 28,019sqm	Warehouse: 20,725sqm	Warehouse: 20,051sqm	Warehouse: - 7,968sqm
	Office: 1,447sqm	Office: 1,246sqm	Office: 1,225sqm	Office: -222sqm
Total GFA	134,565sqm	133,217sqm	128,991sqm	-5,574sqm
Parking Spaces	Warehouse 1: 67	Warehouse 1: 67	Warehouse 1: 57 spaces	-10 spaces
	Warehouse 2: 106 spaces	Warehouse 2: 106 spaces	Warehouse 2: 100 spaces	-6 spaces
	Warehouse 3 and 4: 346	Warehouse 3 and 4: 393	Warehouse 3/4: 357 spaces	+11 spaces
Site Access	Access to warehouse 3 and 4 from Augusta St	No change to site access, minor adjustments to access ramp design.	No change.	No change
Landscaped Area	35.28%	35.47%	34.42%	-0.86%
Tree Canopy Coverage	16.23%	14.87%	16.37%	+0.14%
Uses and Activities				
Land Use	Warehouse and Distribution Centre	Warehouse and Distribution Centre		No change

Ecosystem Credits	28	No change	30	+2
Species Credits	4	No change	7	+3
Operational Hours	24/7	24/7		No change

Based on the above, it is considered the proposal is substantially the same development as originally granted consent, enabling the application to be lodged under section 4.55(1A) of the EP&A Act.

3.3 Proposed Amendments to Conditions of Consent

This section outlines the proposed modification to the description of the approved development and conditions of consent included in SSD-36138263. The proposed modifications are shown by a strike through the deleted text and red text for new text.

Biodiversity

*B52. Prior to any clearing or construction works for the development, the Applicant must purchase and retire ~~twenty-eight~~ **thirty-one** (28 **31**) ecosystem credits and ~~four~~ **five** (4 **5**) species credits to offset the removal/disturbance of ecosystems and species identified in Appendix 3 of this consent. The ecosystem and species credits must be retired in accordance with the requirements of the Biodiversity Offsets Scheme and the Biodiversity Conservation Act 2016.*

B53. The requirement to retire ecosystem and species credits (see condition B52) may be satisfied by payment to the Biodiversity Conservation Fund of an amount equivalent to the number and classes of ecosystem and species credits, as calculated by the Biodiversity Offsets Payment Calculator.

B54. Prior to undertaking any clearing or construction works for the development, the Applicant must provide the Planning Secretary with evidence that:

- a. the retirement of ecosystem and species credits has been completed in accordance with condition B52; or*
- b. a payment has been made to the Biodiversity Conservation Fund in accordance with condition B53.*

Appendix 1 Approved Plans

Final Architectural, Landscape and civil plans referenced in Appendix 1 of the consolidated consent will need to be updated accordingly as part of the consolidated consent.

3.4 Substantially the same Development

Based on the description of the proposed modifications in Section 4, it is considered the proposal is substantially the same development as that to which consent was originally granted, as is required by section 4.55(1A) of the Act.

The proposed modifications do not substantially change the development for which consent was originally granted under SSD-36138263 for the reasons outlined below:

- The key principles of the approved development remain unchanged.
- The development will remain consistent with the land use objectives for Zone IN1 General Industrial.
- The site will continue to consist of warehouse and distribution centre land uses.

- The location of development lots, building locations and internal access roads is only slightly changed from the original consent.
- The scale of built form is relatively consistent with that approved.
- The hours of operation remain unchanged.
- The tree removal and civil works are required to undertake the road works on the Great Western Highway that were approved concurrently with the original SSDA, noting that further detailed design since the issuance of that consent has resulted in a change in civil design and an increased need for tree removal.

4 **Statutory Context**

4 Statutory Context

This section of the report provides an overview of the key statutory requirements relevant to the site and the project as proposed to be modified. It identifies the key statutory matters which are addressed in detail within **Section Error! Reference source not found.**, including the power to grant consent, permissibility, other approvals, pre-conditions and mandatory considerations.

4.1 Statutory Requirements

Table 4 categorises and summarises the relevant requirements in accordance with the DPE State Significant Development Guidelines. A detailed statutory compliance table for the modified project is provided at **Appendix A**.

Table 4 Identification of Statutory Requirements for the Project

Statutory Relevance	Action	Consistency with Approved Development
Power to grant approval	The originally approved development was appropriately categorised as SSD under clause 12 in Schedule 1 of State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP).	The proposal as modified will remain consistent with the requirements of this SEPP and is appropriately characterised as SSD.
Permissibility	The site is zoned IN1 General Industrial in accordance with Section 2.10 of State Environmental Planning Policy (Industry and Employment) 2021. The proposed development constitutes a 'warehouse or distribution centre'.	The modification does not alter the proposed use of the site. The proposal as modified therefore remains permissible.

Other approvals

Biodiversity Conservation Act 2016

Clause 7.9 of the BC Act applies to SSD applications and requires SSD applications to be accompanied by a BDAR unless it is determined the proposal is not likely to have any significant impact on biodiversity values. A BDAR was provided as part of the original SSD Application. An updated BDAR has been provided with this modification which addresses the 'change' in impacts and associated outcomes.

Roads Act 1993

Section 138(e) requires consent from the relevant Road Authority where connection to a classified road (whether public or private) is required for the development. It is noted that the proposal does not alter the existing connections.

The following Acts were considered in the assessment of SSD-36138263, however, no further consideration is required under this modification:

- National Parks and Wildlife Act 1974 (section 90)
- Water Management Act 2000 (sections 89, 90, and 91)
- Fisheries Management Act 1994 (sections 201, 205, and 219)
- Rural Fires Act (section 100B)

Referral to relevant agencies will form part of the SSDA assessment process. However, the proposed development is not considered integrated within the meaning of section 4.41 of the EP&A Act.

4.2 Pre-Conditions

The relevant pre-conditions to exercising the power to grant approval were outlined in the EIS for the original SSDA. The pre-conditions which are relevant to the project as modified and the section where these matters are addressed within the report are summarised in **Table 5**.

Table 5 Pre-conditions

Statutory Reference	Pre-condition	Consistency with Approved Development	Section in Report
State Environmental Planning Policy (Resilience and Hazards) 2021 (R&H SEPP)- clause 4.6(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. It has previously been confirmed remediation works can be undertaken without consent and accordingly, does not form part of this approval.	N/A
State Environmental Planning Policy (Biodiversity and Conservation) 2021 Clause 2.6	A person must not clear native vegetation in a non-rural area of the State that exceeds the biodiversity offsets scheme threshold without the authority conferred by an approval granted by the Native Vegetation Panel under Part 2.4	The site currently contains 2.83ha of areas classified as containing biodiversity value of which 1.78ha is proposed for removal. This includes 0.52ha previously approved, and 1.26ha associated with this modification.	Section 6
State Environmental Planning Policy (Transport and Infrastructure) 2021 Clause 2.48	Before determining a development application where the development is within or immediately adjacent to, amongst other electrical infrastructure, an electrical tower, the consent authority must refer the application to the electrical supply authority for the area.	Endeavour Energy was consulted prior to the lodgement of the original SSDA. It is noted that DPHI may refer a copy of this modification to the relevant consent authority for their comment as part of the assessment process given the minor modification to the operations/footprint under the transmission easement.	N/A
State Environmental Planning Policy (Transport and Infrastructure) 2021 Clause 2.119	A consent authority must not provide development consent on land fronting a classified road unless it is demonstrated that access, safety, and efficiency of the development will not impact this classified road and the type of development is not sensitive to traffic noise or vehicle emissions.	The modification does not propose any changes to the existing approved site access and will not impact the Great Western Highway or M4 motorway having regard to their safety and efficiency.	Section 6.2.1

Statutory Reference	Pre-condition	Consistency with Approved Development	Section in Report
State Environmental Planning Policy (Transport and Infrastructure) 2021 Clause 2.122	A public authority, or a person acting on behalf of a public authority, must not approve traffic generating development without written notice of the intention to carry out the development to TfNSW in relation to the development, and taken into consideration any response to the notice that is received from TfNSW within 21 days after the notice is given.	The proposed warehouse and distribution buildings have a GFA over 5,000m ² and connect to a classified road and accordingly, the proposal is considered traffic generating development. TfNSW was consulted prior to the lodgement of the SSDA. Given the minor changes to GFA proposed, it is unlikely DPHI will refer the SSDA back to TfNSW for their comment as part of the assessment process.	N/A
State Environmental Planning Policy (Industry and Employment) 2021 Clause 2.19	The consent authority must not grant consent to development on land to which this Chapter applies unless it is satisfied that the development contains measures designed to minimise— (a) the consumption of potable water, and (b) greenhouse gas emissions.	The modified development continues to incorporate the previously approved principles of ESD and design initiatives to minimise the consumption of potable water and greenhouse gas emissions.	N/A
State Environmental Planning Policy (Industry and Employment) 2021 Clause 2.20	The consent authority must not grant consent to development on land to which this Chapter applies unless it is satisfied that— (a) building heights will not adversely impact on the amenity of adjacent residential areas, and (b) site topography has been taken into consideration.	The building heights of the approved development remain unchanged under this modification and remain below the wider site's maximum height of building which is 19.4m.	N/A
State Environmental Planning Policy (Industry and Employment) 2021 Clause 2.21	The consent authority must not grant consent to development on land to which this Chapter applies unless it is satisfied that adequate arrangements will be made to connect the roof areas of buildings to such rainwater harvesting scheme (if any) as may be approved by the Secretary.	Each warehouse building onsite has been designed to harvest rainwater into warehouse specific rainwater tanks. No changes to this design element are proposed under this modification.	Section 6.2.2
State Environmental Planning Policy (Industry and	This section applies to any land to which this Chapter applies that is	The proposed environmental impacts of the modified development, including the built form, amenity and	Section 6

Statutory Reference	Pre-condition	Consistency with Approved Development	Section in Report
Employment) 2021 Clause 2.22	within 250 metres of land zoned primarily for residential purposes. The consent authority must not grant consent to development on land to which this section applies unless it is satisfied that the proposed development has considered the potential built form, amenity, and operational impacts on the nearby residential area.	operational impacts, have been assessed in detail having specific regard to the proximity of the residential area to the north. It is noted that the proposed changes under this modification are minor and will not result in the intensification of known impacts which would result in impact to the residential area.	
State Environmental Planning Policy (Industry and Employment) 2021 Clause 2.24	(1) The consent authority must not grant consent to development on land to which this Chapter applies unless it is satisfied that any public utility infrastructure that is essential for the proposed development is available or that adequate arrangements have been made to make that infrastructure available when required.	Existing site utilities and proposed site utility upgrades noted in the original SSDA will accommodate the forecast demands associated with the proposed warehouses and ancillary offices.	N/A
State Environmental Planning Policy (Sustainable Buildings) 2022 Clause 3.2	(1) In deciding whether to grant development consent to non-residential development, the consent authority must consider whether the development is designed to enable the following— (a) the minimisation of waste from associated demolition and construction, including by the choice and reuse of building materials, (b) a reduction in peak demand for electricity, including through the use of energy efficient technology, (c) a reduction in the reliance on artificial lighting and mechanical heating and cooling through passive design, (d) the generation and storage of renewable energy, (e) the metering and monitoring of energy consumption,	The modified development continues to incorporate the previously approved principles of ESD and design initiatives to minimise the consumption of potable water and greenhouse gas emissions. Savings provisions contained in Clause 4.2 of the Sustainable Buildings SEPP notes the policy does not apply to a modification of a development consent which was submitted on the NSW Planning Portal before 1 October 2023.	N/A

Statutory Reference	Pre-condition	Consistency with Approved Development	Section in Report
	(f) the minimisation of the consumption of potable water. (2) Development consent must not be granted to non-residential development unless the consent authority is satisfied the embodied emissions attributable to the development have been quantified.		
State Environmental Planning Policy (Sustainable Buildings) 2022 Clause 3.3	(1) In deciding whether to grant development consent to large commercial development, the consent authority must consider whether the development minimises the use of on-site fossil fuels, as part of the goal of achieving net zero emissions in New South Wales by 2050. (2) Development consent must not be granted to large commercial development unless the consent authority is satisfied the development is capable of achieving the standards for energy and water use specified in Schedule 3. (3) For the purposes of subsection (2), development is capable of achieving a standard specified in Schedule 3 if there is a NABERS commitment agreement in place to achieve the standard.	The modified development continues to incorporate the previously approved principles of ESD and design initiatives to minimise the consumption of potable water and greenhouse gas emissions. Savings provisions contained in Clause 4.2 of the Sustainable Buildings SEPP notes the policy does not apply to a modification of a development consent which was submitted on the NSW Planning Portal before 1 October 2023.	N/A

4.3 Mandatory Considerations

Table 6 outlines the relevant mandatory considerations to exercising the power to grant approval which were considered in the original SSDA.

Table 6 Mandatory Considerations

Statutory Reference	Mandatory Consideration	Section in Modification Report
Consideration under the EP&A Act and Regulation		
Section 1.3	Relevant objects of the EP&A Act	Appendix A
Section 4.15	Relevant environmental planning instruments	
	R&H SEPP – Hazardous and Offensive Development	Addressed as part of original Application – no

Statutory Reference	Mandatory Consideration	Section in Modification Report
		change due to modification
	R&H SEPP – Remediation of Land	Addressed as part of original Application – no change due to modification
	Planning Systems SEPP	Appendix A
	B&C SEPP	Appendix A
	I&E SEPP	Appendix A
	Blacktown LEP	Appendix A
	Relevant draft environmental planning instruments None relevant to the proposed development.	N/A
	Relevant planning agreement or draft planning agreement None relevant to the proposed development	N/A
	Development control plans Huntingwood Precinct Development Control Plan 2011 (HDCP 2011)	Appendix A
	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 7
	The public interest	Section 7
Section 4.55	The proposed development is substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all). The proposed development results in minimal environmental impact when considered on balance and in the context of the existing approval.	Section 3 and Appendix A
Mandatory relevant considerations under EPIs		
R&H SEPP – clause 4.6(1)	As the development will involve a change of use within an investigation area a report specifying the findings of a preliminary investigation of the land concerned carried out in accordance with the contaminated land planning guidelines.	Addressed as part of original Application – no change in use resulting from this modification
T&I SEPP	Part 2.3, Division 17 ‘Roads and Traffic’, Subdivision 2, Clause 2.119 ‘Development with frontage to classified road’ applies to development with a frontage to a classified road. The site has a boundary to the Great Western Highway, M4	Section 6.2.1

Statutory Reference	Mandatory Consideration	Section in Modification Report
	Motorway, and Prospect Highway which are classified roads. The previously approved development considered the proposed development against the ordinance of Clause 2.119 (2). No changes are proposed under this modification that would impact the original findings.	
T&I SEPP	Clause 2.122 'Traffic generating development' applies to development of a certain size designated in Column 1 of the table in Schedule 3 of the T&I SEPP. The proposed development involves a warehouse development of 128,027sqm, being greater than 5,000sqm, and accordingly the application is required to be referred to TfNSW.	N/A
I&E SEPP	Chapter 2 of the I&E SEPP applies to the site as it is within the Western Sydney Employment Area. The development standards and EPI requirements under this Chapter prevail over other EPIs. Objectives and land uses for IN1 Zone as well as other considerations are contained in the following Parts: Part 2.2 – Permitted or prohibited development Part 2.4 – Principal development standards Part 2.5 – Miscellaneous provisions	Addressed as part of original Application – no change as a result of this modification
I&E SEPP	Chapter 3, Part 3.2, Clause 3.6 'Granting of consent to signage' requires applications to display signage must be consistent with the objectives set out in Clause 3.1(1)(a) and assessment criteria under Schedule 5.	Appendix A
Considerations under other legislation		
<i>Biodiversity Conservation Act 2016 (BC Act) – section 7.14</i>	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 6.1.1
Development Control Plans		
Huntingwood Precinct Development Control Plan (HDCP 2011)	Clause 2.10 of the Planning Systems SEPP states that development control plans (whether made before or after the commencement of this Policy) do not apply to SSD. Regardless of the above, detailed consideration has been given to the site-specific DCP which applies to the Huntingwood Precinct.	Appendix A
Development Contributions Plan		
Voluntary Planning Agreement	A S7.11 Contribution Plan currently does not apply to the site. As stipulated in condition A28 of the development consent, a Planning Agreement has been entered into between the	Addressed as part of original Application – no

Statutory Reference	Mandatory Consideration	Section in Modification Report
	Applicant and Blacktown City Council. The works stipulated by that Planning Agreement must be delivered prior to the issue of any Occupation Certificate on the land.	change as a result of this modification.

5 Engagement

5 Engagement

Significant engagement was undertaken with nearby residents as part of the original SSDA.

The project team and applicant have been liaising with officers from the DPHI familiar with the project since May 2026. More recently, a formal scoping report was submitted with the DPHI via the Major Projects Portal on the 5 June 2026. Where relevant, outcomes from this engagement have informed the preparation of this Modification Report.

6 **Assessment of Impacts**

6 Assessment of Impacts

This section provides a comprehensive summary of the updated technical studies undertaken to assess the potential impacts of the proposed modifications and the updated mitigation, minimisation and management measures recommended to avoid unacceptable impacts.

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

6.1 Standard Assessment Impacts

This section of the report addresses the matters which require a standard assessment. It outlines the findings of the assessment and the key mitigation measures used to ensure compliance with the relevant standards or performance measures.

6.1.1 Biodiversity

Anne Clements and Associates Pty Ltd have prepared a Biodiversity Development Assessment Report (**BDAR**) for the proposed modification which is provided at **Appendix I**. The BDAR assesses the proposed development in accordance with the BC Act regarding any biodiversity impacts associated with the proposal, focusing on 'new' or 'additional' clearing sought under this modification to facilitate delivery of the required TfNSW road works design.

It is noted that the site has not been identified as biodiversity certified land, and so consistency with the relevant biodiversity measures conferred by a certification have not been included. The BDAR has been prepared in-line with the Biodiversity Assessment Methodology 2020 (**BAM**) under the supervision of an accredited BAM assessor, Dr Anne Marie Clements.

6.1.1.1 Potential Impacts

The Ground Disturbance Area proposed as part of this modification is approximately 1.32 ha in size as shown below.

Figure 13 Vegetation Impacted Mod 2 Ground Disturbance Area



Source: Anne Clements & Associated Pty Ltd, 2026

The vegetation affected was sampled in seven BAM Plots (Plots 10 to 16) and two patches (O, P) on 23 February, 3, 22 May and 10 June 2026. A total of 59 species (19 local native, 2 non-local native, 38 exotic including 21 High Threat Weeds) were recorded. Exotic species formed a major component of the vegetation recorded in the plots, with the percentage number of native to total species (33% for Plot 10, 14% for Plot 11, 30% for Plot 16) and native to total cover (24.3% for Plot 10, 25.5% for Plot 11, 36.0% for Plot 16) recorded being low in all of the plots. All Plots had native canopy trees present.

There is no scope to modify the location of the proposal, noting the works are to facilitate delivery of road works the subject of the WAD with TfNSW, who have required the works to occur. The opportunities to avoid and minimise impacts in the 0.26 ha of Conservation Area A subject to land disturbance, have been adopted. This area adjoins the shared path and does not preclude the establishment of native canopy trees.

The ground disturbance has provided the opportunity to reduce the existing steep batters to 1:3 and 1:4 slopes, post construction. This minimises the existing erosion risk and improves the landform for the re-establishment of native canopy species.

Given that Important Habitat for the Swift Parrot has been identified along the drainage swale on the Augusta Estate, conservation areas are proposed to be expanded to incorporate all areas fronting the GWH. This involves replacing the approved landscaping with Swift Parrot food resources (i.e. with native canopy species *Eucalyptus moluccana* and *E. tereticornis*).

There are no likely residual prescribed impacts.

The proposed works sought for consent under this modification require the purchase of a further 3 ecosystem credits, and 1 species credits, to offset the impacts.

6.1.2 Civil Engineering

A Civil Infrastructure advice letter and corresponding Plans have been prepared by Costin Roe in support of the modified development, included at **Appendix J**. As noted in the advice, the proposed modifications are

predominantly architectural in nature and do not result in any material changes to the approved stormwater management, water quality, on-site detention, or rainwater reuse strategies.

The most notable layout modification is the revised undercroft car park arrangement beneath Warehouse 3, along with tree removal within the Great Western Highway Road reserve for the approved left-turn lane at the Flushcombe Road/Great Western Highway intersection.

Stormwater

The proposed changes have a negligible impact on the overall stormwater management strategy. The on-site detention (**OSD**) tanks remain generally in their approved locations, with insignificant changes to the post-development catchment extents. Similarly, there are negligible impacts to the proposed stormwater quality treatment train, which remains unchanged, resulting in no material changes to the MUSIC modelling outcomes. The proposed rainwater tank capacities and associated reuse strategy also remain substantially unchanged.

It is noted that the earthworks associated with the construction of the approved Great Western Highway/Flushcombe Road intersection result in negligible impacts to flood behaviour within the watercourse crossing beneath the Great Western Highway.

Updated MUSIC modelling included with this Modification Report has been completed to confirm the proposed modification can meet the stormwater quality targets. The following table outlines the MUSIC modelling outcomes.

Table 7 Stormwater Quality

Pollutant	Source	Residual Load	% Reduction
Total Suspended Solids (kg/yr) (TSS)	18400	1720	90.7
Total Phosphorus (kg/yr) (TP)	40.1	12.7	68.3
Total Nitrogen (kg/yr) (TN)	299	159	47
Gross Pollutants (kg/yr) (GP)	3190	0	100

The results above remain consistent with the outcomes of Mod 1 stormwater modelling, inclusive of the proposed changes and will continue to meet the minimum pollution reduction targets in the Huntingwood Precinct DCP. As such, the development as proposed to be modified will continue to align with the stormwater management criteria that have been previously approved under SSD-36138263 and will not result in any additional impacts. No additional mitigation measures are required to support the development as proposed to be modified.

Flooding

It is noted that a detailed flood impact and risk assessment (**FIRA**) was included with SSD-36138263 which considered the two watercourses within the site. The changes proposed in this modification do not include any changes to the overall impervious area of the site nor any changes to the Blacktown Creek.

The proposed works within the Great Western Highway road reserve associated with the already approved left-turn lane into the upgraded Great Western Highway/Flushcombe Road intersection require localised cut and fill earthworks to facilitate the transition between the proposed road upgrade and the development site. As part of these earthworks, the fill batter associated with the road upgrade extends partially into the existing watercourse corridor, resulting in a localised modification to the current channel geometry.

The extent of this encroachment has been assessed as part of the revised flood modelling and has been incorporated into the proposed drainage and flood management arrangements. To assess the impacts of these changes, the approved (1% AEP storm only) post development flood model was updated to incorporate the proposed earthworks, and a revised 1% AEP flood assessment was undertaken. The modelling confirms

that the proposed works within the road reserve result in negligible changes to flood behaviour within the development boundary, and no impact downstream of the site. Furthermore, all buildings remain 500 mm+ above the 1% AEP flood level, consistent with the approved development.

Given the negligible impact of the proposed modifications, a revised Flood Assessment Report is not considered necessary as part of this modification. Further, it is noted that no additional mitigation measures are required.

6.1.3 Acoustic

A revised Operational Noise Impact Assessment (**ONIA**) has been prepared by SLR to support this Modification Report. The ONIA assessed noise impacts from noise sources as outlined below, consistent with the previously approved Noise and Vibration Impact Assessment which supported the SSD:

- On-site Traffic
- Handstand and Loading Docks
- Internal Activities
- Mechanical Plant

A map depicting the modelled noise source locations is included in the Figure below.

Figure 14 Modelled Noise Sources Mod 2



Source: SLR, 2026

The SoundPLAN noise model prepared for the SSDA36138263 has been updated to account for the changes sought under this modification. Based on the update, the ONIA makes the following conclusions:

- Noise levels from the development once operational are predicted to comply with the development consent noise limits at all receivers during all periods.

- The predicted noise levels are generally consistent with the approved noise levels, with only minor differences at the nominated receivers due resulting from the proposed layout amendments.
- The MOD2 development will comply with the requirements of the NPfI and is considered unlikely to result in noise impacts at the relevant sensitive receivers.
- A detailed maximum noise assessment was conducted in the SSDA NIA which concluded that maximum noise events from truck movements during the night-time period would be unlikely to result in an adverse acoustic impact on the existing residences in NCA02, including R06. Based on the revised assessment, predicted infrequent sleep disturbance exceedances are considered of low significance and do not warrant any further mitigation measures, consistent with the outcomes of the SSDA NVIA.

Accordingly, the SLR conclude the project is supportable on acoustic grounds, and that no additional mitigation measures are considered necessary.

6.2 Minor Assessment Impacts

Table 8 summarises the matters which required a minor assessment of the proposal as modified.

Table 8 Minor Assessment Impacts

Issue	Findings	Mitigation Measures
Traffic and Parking	A Traffic and Transport Statement has been prepared by Colston Budd Rogers & Kafes Pty Ltd and is included at Appendix G. It assesses changes proposed under this modification, and as it relates to traffic and parking, the proposed upes to GFA, vehicular accessways, and car parking. It also assesses the potential for additional impacts on the surrounding road network as a result of the proposed modifications. The assessment makes the following conclusions: ▪ Parking provision remains in accordance with the Huntingwood DCP requirements. ▪ Appropriate disabled parking, motorcycle parking and bicycle parking has been provided consistent with earlier approvals. ▪ Access arrangements onto Flushcombe Road and Augusta Street remain unchanged from the approved development. ▪ Internal circulation, servicing and car parking arrangements will be provided in accordance with the Australian Standard for Parking Facilities (Part 1: Off-street car parking and Part 2: Off-Street Commercial Vehicle Facilities), AS2890.1-2004 and AS2890.2-2018. ▪ The proposed modified development would result in a reduction in traffic generation of some 9 vehicles per hour two-way during the weekday AM and PM peak periods from the approved development. Intersections in the vicinity of the site would therefore operate at similar or improved levels of service during peak periods, compared to the approved development.	No additional mitigation measures have been proposed.

Issue	Findings	Mitigation Measures
	Accordingly, the proposed modifications sought under Mod 2 do not result in the intensifications of known traffic impacts, nor the creation of new traffic impacts, and that the proposal remains substantially the same as that of which consent was previously granted.	
BCA & Fire Engineering	A revised BCA report has been prepared by BM+G and is provided at Appendix D. The report confirms that the modified design is capable of achieving compliance with the Building Code of Australia 2022 and Disability (Access to Premises – Buildings) Standards 2010. The report also outlines the performance solutions that will require resolution during the Construction Certificate stage. In addition, a revised Fire Safety Strategy has been prepared by Affinity Fire Engineering and is provided at Appendix E. The report outlines the fire engineering principles that will be utilised to ensure the prescriptive non-compliances with the Deemed-to-Satisfy provisions of the BCA are resolved through a fire engineered Performance Solution to comply with the relevant building regulations.	No additional mitigation measures have been proposed.
Indigenous Archaeology	A Heritage Letter of advice has been prepared by Biosis Pty Ltd and is included at Appendix C. As noted in the letter, three previous assessments have been prepared to support SSD-36138263, including an Aboriginal Cultural Heritage Assessment (ACHA), a Statement of Heritage Impact (SoHI) (Coast History & Heritage 2023a, Coast History & Heritage 2023b), and a Aboriginal Cultural Heritage Management Plan (ACHMP) was also prepared (Artefact Heritage and Environment 2025) post approval. Based on the assessment of the ACHA and SoHI, Biosis confirm there is low potential for Aboriginal objects to be present and there are no additional impacts to locally or State listed items. Therefore, the recommendations of the 2023 ACHA and SoHI are applicable to this LoA, and no further mitigation measures are required to be implemented.	No additional mitigation measures have been proposed.
Waste Management	A revised Waste Management Plan (WMP) has been prepared by JBS&G and is included at Appendix J . Minor adjustments to the waste management system (bin locations etc.) have been made as part of this modification application. This WMP carries forward the waste streams, classifications, quantities and management measures established in the approved Waste Management Plan. The WMP found that the proposed modifications do not propose any additional impacts beyond what was assessed under the original application.	No additional mitigation measures have been proposed.
Earthworks	A civil engineering letter of advice has been prepared by Costinroe and is provided at Appendix J . As noted in the letter, minor adjustments to the cut and fill are proposed to accommodate the undercroft parking area.	No additional mitigation measures have been proposed.

Issue	Findings	Mitigation Measures
	Further, it is noted that earthworks arrangements remain generally consistent with the original design application, noting that the overall pad levels on Lots 3 and 4 have been increased slightly to accommodate minor differences in actual topsoil thickness across the site and for future site spoil during construction. A revised earthworks and building level plan are included in the civil engineering drawings which depict the proposed levels over the site.	
Lighting & Signage	All lighting associated with the development will comply with the latest version of AS 4282-2019 – Control of the obtrusive effects of outdoor lighting (Standards Australia, 2019), and will be mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network. These requirements will ensure consistency with condition B76 of the overarching SSDA consent. While minor changes to signage are proposed, they remain substantially the same as that for which consent was originally granted, while also remaining reasonably within the expectations of such an estate. Signage viewable from the public domain will be transient at most, and unlikely to result in tangible impact.	No additional mitigation measures have been proposed.
Visual Impact	An update to the approved Visual Impact Assessment has been provided. Due to the extremely minor nature of the changes from a visual perspective, there are no tangible changes from a visual perspective noted nor expected.	No additional mitigation measures have been proposed.

6.3 Minimal Environmental Impact

Section 4.55(1A) of the EP&A Act requires that, an application to modify a consent under this part, demonstrate that it results in minimal environmental impact. As detailed in **Section 6** of this report, the proposal has been accompanied by various consultant reports each attached in the appendix of this report that consider the impacts of the proposed modification.

It is concluded that from the above and accompanying technical reports, the proposed modification is considered to give rise to only a minimal environmental impact in accordance with 4.55(1A) of the EP&A Act.

7

Justification of Modified Project

7 Justification of Modified Project

This section of the report provides a comprehensive evaluation of the modified proposal having regard to its economic, environmental and social impacts, including the principles of ecologically sustainable development.

It assesses the potential benefits and impacts of the proposed modifications, considering the interaction between the findings in the detailed assessments and the compliance of the proposal within the relevant controls and policies.

7.1 Project Design

The proposal has been designed to retain the key principles of the overall Huntingwood Warehouse Estate layout approved in the Development consent. These principles include:

- While additional earthworks and tree clearing are required, these works facilitate outcomes imposed on ESR by TfNSW to deliver the required intersection design and shared pedestrian upgrades. That is, conditions B6 to B12 on the overarching consent require ESR to enter into a Works Authorisation Deed (**WAD**) with TfNSW for all civil works associated with the access road connection to the highway. The WAD process has necessitated design coordination requiring changes to the civil design and tree retention extent.
- The proposed modifications will not affect the design and location of the intersection works and upgrades at Flushcombe Road and the Great Western Highway. Indeed the tree removal is proposed to support delivery of these intersection upgrade works. Nor does it impact on the retention of the creeks and riparian extent which exist at the site.
- The development as proposed to be modified will contribute to the long-term future supply of industrial land and will deliver high quality landscaped lots with sustainable and attractive buildings consistent with the Applicant's branding styles, which are functional and respond to the operational needs of future tenants.
- Appropriate acoustic mitigation design elements, internal access roads, services infrastructure as well as stormwater and drainage elements. These ensure the modified development will continue to deliver an appropriate development outcome that does not adversely impact the area.
- The proposal generally retains a consistent GFA (less than 1% change across the wider site) and parking which is compliant with the Huntingwood DCP.

The assessment of the proposal has determined that the mitigation measures established under the original SSDA remain appropriate for the development as proposed to be modified. As per the current consent, these are required to be implemented before or during the construction or operational phases of the project in order to ameliorate environmental impacts.

7.2 Strategic Context

The modified proposal continues to align with the strategic direction and objectives established within the broader strategic context established by the NSW Region Plan and District Plan as demonstrated in **Section 2**. The delivery of a significant amount of employment generating floor space will also contribute to the continued growth of the freight and logistics network in Western Sydney.

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

7.3 Statutory Context

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

- The proposal 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 **Appendix A**.
- Consideration is given to the relevant matters for consideration as required under the BC Act. A BDAR assessment was undertaken as part of the original SSD application, and a revised BDAR has been provided with this modification capturing additional scope imposed on ESR by the TfNSW upgrade works. This includes the purchasing of an additional biodiversity and species credits.
- The proposal complies with all relevant provisions of applicable SEPPs as detailed in **Appendix A**. The proposal is consistent with the objectives of IN2 Light Industrial zone.
- The relevant State and local environmental planning instruments are outlined in **Section 4** and assessed in detail within **Appendix A**. The assessment concludes that the proposal will comply with the relevant provisions within the relevant instruments as summarised below:
 - The proposal will comply with all of the relevant provisions under the I&E SEPP 2021 as detailed in **Appendix A**.
 - While the proposal results in additional impacts to the vegetation species in the affected works area, these are, on balance, considered to be minor in nature in the context of the broader estate, while also maintaining compliance with the EPBC Act
 - The proposal has been prepared to maintain compliance with the Huntington Precinct DCP provisions as they relate to built form and overall design.

7.4 Community Views

As set out in **Section 5**, there was significant engagement with neighbouring landowners during the preparation phase of the SSDA. No formal pre-lodgement engagement with the community has yet been undertaken in relation to this MOD given the consistency with the approved scheme, and minor nature of the changes proposed.

Public notification will occur during the assessment of the modification.

7.5 Likely Impacts of the Modified Proposal

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

- **Natural Environment:** The proposed modifications address the principles of ecologically sustainable development (**ESD**) in accordance with the requirements of the Environmental Planning and Assessment Regulation 2021 (**the Regulations**) and as outlined below:
 - Precautionary principle: The precautionary principle relates to uncertainty around potential environmental impacts and where a threat of serious or irreversible environmental damage exists, lack of scientific certainty should not be a reason for preventing measures to prevent environmental degradation. Consistent with the original SSDA assessment and subsequent modification, no serious or irreversible environmental impacts are proposed nor anticipated.
 - Intergenerational equity: The needs of future generations are considered in decision making and that environmental values are maintained or improved for the benefit of future generations. The site will result in the creation of jobs in a highly accessible location.

- Conservation of biological diversity and ecological integrity: The proposal will not have any unacceptable impacts on the conservation of biological diversity and ecological integrity. The proposal includes landscaped areas and setbacks including native species planting consistent with earlier approvals.
- Improved valuation, pricing and incentive mechanisms: This requires the holistic consideration of environmental resources that may be affected as a result of the development including air, water and the biological realm. It places a high importance on the economic cost to environmental impacts and places a value on waste generation and environmental degradation. The proposal will not have any unacceptable environmental impacts in relation to air quality, water quality or waste management. The effects of the development will be acceptable and managed accordingly by the proposed mitigation measures as required.
- **Built Environment**: Given the minor nature of the changes overall, there are no anticipated impacts to matters such as acoustics, traffic, visual or then like. The proposed changes remain well within an outcome reasonably anticipated for the site.
- **Social**: The proposal will facilitate the intended warehouse building operations and thus will facilitate local employment opportunities both in the construction and operational phases.
- **Economic**: The proposal will continue to have positive economic impacts through enabling the delivery of industrial uses on site which will result in investment and economic benefit for Sydney as well as the wider region.

The potential impacts can be mitigated, minimised or managed through the measures discussed in detail within **Section Error! Reference source not found.** and as summarised in **Appendix A** of this Modification Report.

7.6 Suitability of the Site

The site is considered highly suitable for the modified proposal for the following reasons:

- The proposed land use is not proposed to be amended or altered and remains permissible in the IN2 Light Industrial zone in accordance with the I&E SEPP.
- The proposal remains consistent with the relevant State and local strategic and statutory policy, including delivery of additional industrial floorspace and employment opportunities within Western Sydney.
- The proposal continues to satisfactorily respond to the siting and design requirements outlined within the I&E SEPP and the Huntingwood DCP, including detailed consideration of impacts to the residential properties to the north.
- The proposal as amended can be accommodated on the site without providing unacceptable impacts to the surrounding road network, including nearby intersections.
- The detailed assessment reports confirm the impacts of the proposed development as amended are either negligible or can be mitigated, minimised or managed through the implementation of recommended actions.

7.7 Public Interest

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

- The proposal will provide up to over 600 full time jobs during the construction phase, and in excess of 900 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.
- No major environmental, social, or economic impacts will result from the proposal.

- The redevelopment of the site will continue to deliver critically needed industrial floor space close to Western Sydney, with a refined design which has directly responded to market demand.

Having considered all relevant matters, we conclude the development as modified is appropriate for the site and approval is recommended.

Disclaimer

This report is dated June 2026 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of The Trustee for Huntingwood Property Trust (**Instructing Party**) for the purpose of Town Planning Services (**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.

Appendix A Statutory Compliance Table

Appendix B Acoustic Report

Appendix C Architectural Plans

Appendix D BCA Assessment

Appendix E Fire Engineering Advice

Appendix F Heritage Letter of Advice

Appendix G Traffic and Parking Assessment

Appendix H Waste Management Plan

Appendix I Biodiversity Assessment Report

Appendix J Civil Engineering

Appendix K Visual Impact Assessment



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