

To whom it may concern,

I strongly object to the Augusta Street Warehouse and Distribution Centre (SSD-36138263). I am a resident of Hampton Crescent and the impact on my view and amenity will be significant. I am not opposed to development- I work in construction! But this proposal is a poor fit for the area, where there are not any other buildings anywhere near as high.

This development application has been submitted under the Industry and Employment SEPP (2021), and specifically chapter two the Western Sydney Employment Area. That policy sets out a clear framework for what can and can't be approved, and this development does not meet the criteria for approval.

There are two sections in particular in the SEPP that this project does not comply with.

Section 2.20 reads:

The consent authority must not grant consent to development on land to which this State Environmental Planning Policy (Industry and Employment) 2021 [NSW] 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.

And section 2.22 reads:

(1) This section applies to any land to which this Chapter applies that is within 250 metres of land zoned primarily for residential purposes.

(2) The consent authority must not grant consent to development on land to which this section applies unless it is satisfied that—

(a) wherever appropriate, proposed buildings are compatible with the height, scale, siting and character of existing residential buildings in the vicinity, and

(b) goods, plant, equipment and other material resulting from the development are to be stored within a building or will be suitably screened from view from residential buildings and associated land, and

(c) the elevation of any building facing, or significantly exposed to view from, land on which a dwelling house is situated has been designed to present an attractive appearance, and

(d) noise generation from fixed sources or motor vehicles associated with the development will be effectively insulated or otherwise minimised, and

(e) the development will not otherwise cause nuisance to residents, by way of hours of operation, traffic movement, parking, headlight glare, security lighting or the like, and

(f) the development will provide adequate off-street parking, relative to the demand for parking likely to be generated, and

(g) the site of the proposed development will be suitably landscaped, particularly between any building and the street alignment.

In this submission, I will outline how the proposal does not meet the requirements of section 2.20 and section 2.22 parts a, c and e. The proposal is within approximately 65m of residentially zoned land, so 2.22 applies to this project. I will also outline why two other requirements of the Secretary's assessment requirements have not been appropriately met.

2.20 Height of Buildings

The proposed building height will significantly impact the amenity of adjacent residential areas. The building heights of the existing residential area to the north does not exceed 7.0m in height. By contrast, this project exceeds that height by almost 28m. There is no compatibility.

2.22 2(a) Fit with the surrounding context

The proposal is not relevant to and resonant with local character, heritage and communal aspirations. It is a poor fit and does not respond to context. The local character is primarily single family, low density residential properties surrounded by parkland. A large scale industrial factory occupying as much land as possible does not fit with the surrounding context. While there is some other industrial and commercial land nearby, it is single-storey. The proposed design with *"metal cladding, paired with the punctuating office elements, including white and orange prefinished metals and glass to create visual interest"* is not a visual fit with the style of the surrounding buildings.

Additionally, the Architectural drawings do not show any signage, so it is impossible to assess whether future signage will be "compatible".

2.22 2(c) Visual Impact

The EIS states that "The proposal will not result in any adverse visual impacts and the extent of the visual effects generated is acceptable in the immediate and wider visual context."

This report does not capture the impact on my home at 61 Hampton Crescent which is not even mentioned in the report. You can see from the photos below that this development has a high impact on the current views from my second-storey window.. Given the estimated tree heights and numbers the impact will not be significantly reduced.

Given the North facing double height factory proposal, this will have a high impact on the residential property. This condition has not been satisfied. The landscape proposal for softening

over time does not even cover half way up the proposed development. Given the only 20m there is not much space to provide further impactful screening. As you can see from the photos supplied by 61 Hampton Cr which will be severely impacted, no consideration has been given to the impact of solar panels, and or signage or the proposed precast noise walls up the ramp.



2.22 2(d) Noise impact

The proposal is for a 24-hour facility. The noise and vibration assessment showed that even if all the mitigation measures are put in place, the operational noise will still not be compliant (see page 36 and 38). Heavy truck airbrake use exceeds sleep disturbance criteria, and the project only achieves compliance when assuming only 10 movements from articulated trucks per night, across all warehouses. At my home, the model is only 1dB under the criteria, well within the possibly error in such a model. I have two young daughters who will be affected by this. At the very least, I believe this report should be peer reviewed by an independent expert who can replicate the model.

2.22 2(e) Traffic impact

The proposal adds a large volume of cars to an already busy intersection and main road. The analysis has been based primarily on the rating of the Flushcombe road intersection, which is

already a poorly performing intersection. However, the level of service will drop significantly even within the poor “F” rating. The table on page 91 shows that by 2032 the predicted average evening delay turning right onto Flushcombe Road from the would take 407.3 seconds, when compared with an average 152.2 second wait for the turn without the development. That will absolutely cause “nuisance” to residents. This report and modeling should also be reviewed by an independent subject matter expert.

Other concerns

Urban heat island effect

Already, it is between 8C and 10.5C hotter in Western Sydney than it is in the eastern parts of the city. On Factory 5 alone, the development is proposing to have 25,000sqm of photovoltaic solar panels. Solar panels do not mitigate heat effects- they add to them. The project also includes 951 outdoor hardstand car parking space. While the project will provide 16.23% tree canopy coverage, that is insufficient to offset the huge additional heat load and mitigate the urban heat island effect.

Aboriginal consultation

Whilst it was indicated there was a reach out to the LALC, no attempt was made to attend the offices and explain the impact the development will have on Aboriginal Heritage. This is a site of some significance, and as the LALCs are currently overwhelmed with projects they are asked to consult on, additional effort should have been given to ensuring they responded.

Given artifacts were found, the land development needs to consider adding a yarning circle for onsite indigenous workers and community to ensure the heritage is not lost.

In summary, this project does not meet the criteria for a project that can be approved under the Industry and Employment SEPP (2021) and specifically chapter two the Western Sydney Employment Area. This policy had additional provisions for proposals within close range of residential areas for situations like this. This project pushes beyond the boundaries of what is acceptable near a residential area. It would be a total misapplication of the SEPP to approve this development.

Thank you for reviewing the above.

Kind Regards

Travis Searle
Resident of 61 Hampton Crescent Prospect