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URBIS

Environmental Impact Statement

Augusta Street Warehouse and
Distribution Centre

Prepared for

**The Trustee for Huntingwood
Property Trust**

12 September 2023

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

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Project Code	P%36077
Report Number	Formal Lodgement – September 2023

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Signed Declaration

Project details			
Project name	Augusta Street Warehouse and Distribution Centre		
Application number	SSD-36138263		
Address of the land in respect of which the development application is made	Augusta Street, Blacktown Lot 1 DP835264 Lots 218-219 DP457024 Lot 2151 DP135859 Lot 2 DP516449 Lot 163-164, 168-188 and 216 DP8716 Lot 1 DP119616 Lots 4-6 DP226294 Lots 50-52 DP1144623 Lot 7 DP803359 Lots 6-10 DP801210 Lot 4 DP585492 Lot 4 DP583442 Lot 2 DP1263824		
Applicant details			
Applicant name	The Trustee of Huntingwood Property Trust		
Applicant address	L29, Aurora Place, 88 Philip Street, Sydney NSW 2000, Australia		
Details of people by whom this EIS was prepared			
Names and professional qualifications	Jennifer Cooper Bachelor of Town Planning (UNSW)	Naomi Daley Bachelor of Urban Planning (USyd)	Matthew Holt Bachelor of City Planning (UNSW)
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 2021*;
- 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;
- contains the information required under the *Registered Environmental Assessment Practitioner Guidelines*;
- 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



Jennifer Cooper, Director (RPIA #84249)



Naomi Daley, Associate Director

12 September 2023

Glossary and Abbreviations

Reference	Description
ACHAR	Aboriginal Cultural Heritage Assessment Report
ACM	Asbestos Containing Material
AEP	Annual Exceedance Probability
AHD	Australia Height Datum
AHIMS	Aboriginal Heritage Information Management System
AIA	Arboricultural Impact Assessment
AQIA	Air Quality Impact Assessment
ARI	Average Recurrence Interval
ASS	Acid Sulphate Soils
BAM	Biodiversity Assessment Method
BC Act	<i>Biodiversity Conservation Act 2016</i>
BDAR	Biodiversity Development Assessment Report
CBRK	Colston Budd Rogers & Kafes Pty Ltd
CEMP	Construction Environmental Management Plan
CIV	Capital Investment Value
CMP	Construction Management Plan
COPC	Contaminants of Potential Concern
CTMP	Construction Traffic Environmental Plan
DCP	Development Control Plan
DGs	Dangerous Goods
DP	Deposited Plan
DPE	New South Wales Department of Planning and Environment
DSI	Detailed Site Investigation
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPA Regulation	<i>Environmental Planning and Assessment Regulation 2021</i>

Reference	Description
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EIS	Environmental Impact Statement
EPA	New South Wales Environment Protection Authority
EPI	Environmental Planning Instrument
ESCP	Erosion and Sediment Control Plan
ESD	Ecologically Sustainable Development
GANSW	Government Architect New South Wales
GFA	Gross Floor Area
GTP	Green Travel Plan
HDGP 2011	Huntingwood Precinct Development Control Plan 2011
HIPAP	Hazardous Industry Planning Advisory Paper
HIS	Heritage Impact Statement
I&E SEPP	<i>State Environmental Planning Policy (Industry and Employment) 2021</i>
LAeq	A frequency-weighted Equivalent Continuous Sound Level
LGA	Local Government Area
LSPS	Local Strategic Planning Statement
MUSIC	Model for Urban Stormwater Improvement Conceptualisation
NML	Noise Management Level
NRAR	Natural Resource Access Regulator
NSW	New South Wales
NVIA	Noise and Vibration Impact Assessment
OEMP	Operational Environmental Management Plan
PAD	Potential Archaeological Deposit
PAM	Pre-Application Meeting
PBP	Planning for Bushfire Protection
PCT	Plant Community Type
PMF	Probable Maximum Flood
POM	Plan of Management

Reference	Description
PSI	Preliminary Site Investigation
SAII	Serious and Irreversible Impacts
SARs	Commonwealth Supplementary Assessment Requirements
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SIA	Social Impact Assessment
SIDRA	Signalised & Unsignalised Intersection Design and Research Aid
Site	Lot 1 DP835264, Lots 218-219 DP457024, Lot 2151 DP135859, Lot 2 DP516449, Lot 163-164, 168-188 and 216 DP8716, Lot 1 DP119616, Lots 4-6 DP226294, Lots 50-52 DP1144623, Lot 7 DP803359, Lots 6-10 DP801210, Lot 4 DP585492, Lot 4 DP583442, and Lot 2 DP1263824
SSD	State Significant Development
SSDA	State Significant Development Application
TfNSW	Transport for New South Wales
TIA	Traffic Impact Assessment
UXO	Unexploded Ordnance
VIA	Visual Impact Assessment
VIS	Vegetation Integrity Score
WCM	Water Cycle Management
WSEA	Western Sydney Employment Area
WMP	Waste Management Plan
WSUD	Water Sensitive Urban Design
WWTP	Wastewater Treatment Plant

Executive Summary

This Environmental Impact Statement (EIS) has been prepared on behalf of the Trustee for Huntingwood Property Group (**the applicant**) in support of a State Significant Development Application (SSDA) for the site at Augusta Street, Huntingwood. An aerial photograph of the site is provided as **Figure 1**.

Figure 1 – Site Aerial Photograph



Source: Urbis

Project Background

The Trustee for Huntingwood Property Group (with LOGOS Property Group as development partner) purchased the majority of the site in late 2021 and early 2022. The remaining land parcels are in the process of being acquired from Blacktown City Council and Amplitel Pty Ltd.

The consolidated land holding comprises a total of 26.64ha of undeveloped industrial zoned land within the Western Sydney Employment Area (WSEA). the site is immediately adjacent to two motorways, the Great Western Highway and the M4, connecting the site to the major road freight corridors of Sydney (Refer to **Map 1**).

The connectivity to transport infrastructure underpinned the purchase of the site, noting its strategic location within Central Sydney and opportunity to support increasing demand from e-commerce, transport and logistics customers to service the growing population in Western Sydney¹.

Due diligence investigations undertaken by LOGOS to inform the land acquisition confirmed a SSDA had previously been lodged for a data centre to be developed across part of the site (SSD-10469). A detailed review of this proposal was undertaken to understand its scope and the reasons underlying the withdrawal of the application. The key learnings from this review have been applied in the siting, design and assessment of the current proposal.

¹ <https://www.theurbandevolver.com/articles/logos-transactions-huntingwood-reservoir-logistics-estate>, downloaded 13 July 2023

Significant consultation was undertaken with TfNSW during the preparation of the SSDA to facilitate agreement for a 'fourth leg' from a new intersection on the Great Western Highway. The delivery of access from the Great Western Highway provides significant benefits, including reducing the potential impacts on the Flushcombe Road intersection, as well as reducing the potential environmental impacts associated with a bridge crossing over Blacktown Creek.

Project Objectives

The proposed development includes the delivery of four best-in-class warehouse and distribution buildings with ancillary office across the site, including a two-storey multi-level warehouse on the eastern portion of the site. Specifically, the intended outcomes of the project are to:

- Deliver a state-of-the-art industrial precinct to respond to the current market demands and tenant requirement for modern supply chain and distribution facilities and increased employment opportunities within Western Sydney.
- Appropriately site and design the buildings to achieve design excellence and respond to the surrounding local context, including the residential properties to the north and heritage-listed church to the east.
- Optimise the proximity of the site to the motorway network which provide connections from the site to the wider Sydney area via the Great Western Highway and M4 motorway.
- Provide significant landscape works along the site boundaries and within the conservation zones to enhance the biodiversity outcome, provide an attractive streetscape and on-site amenity for workers and visitors to the site.

As the proposal is for the purposes of 'Warehouse or distribution centres' with a capital investment value of \$446 million, it is classified as a State Significant Development (**SSD**) under Clause 12, Schedule 1 of *State Environmental Planning Policy (Planning Systems) 2021* (**Planning Systems SEPP**).

Feasible Alternatives

Various project alternatives were considered by the applicant for the proposed warehouse and distribution precinct. Design concepts were prepared and revised in response to ongoing feedback from key stakeholders, including the Department of Planning and Environment (**DPE**), Transport for NSW (**TfNSW**) and Blacktown City Council (**Council**).

Option 1 – 'Do Nothing'

The "do nothing" approach does not provide a desirable outcome as the site would remain a vacant undeveloped site. It would fail to realise the benefits associated with the potential of the land to deliver employment generating opportunities and investment to support economic development in Blacktown and Western Sydney.

Option 2 – Alternative Locations

LOGOS undertook extensive research and investigations to identify industrial zoned land available for purchase and development within Western Sydney. There is a critical under-supply of zoned and serviced land which is suitable to meet the needs of modern day warehouse and logistics tenants. There were no other sites available which met the criteria established by LOGOS to deliver the project objectives.

Option 3 – Alternative Layouts

Multiple concept designs were tested by the applicant in consultation with Blacktown City Council and State Agencies, including DPE and TfNSW, to maximise the site potential while minimising potential biodiversity, traffic, and building bulk impacts.

Consideration was given to multiple alternative designs, including development options which provided all vehicle access from Flushcombe Road and various design iterations and architectural treatments. Each of these options was assessed and ultimately dismissed based on the potential impacts on the site and surrounding locality, including traffic, noise, ecological, visual and other amenity impacts.

Option 4 – The Proposal

The preferred design and layout has been progressed and refined in-line with recommendations from Blacktown City Council regarding the design excellence provisions, including the architectural treatment of

the buildings and the landscaped setbacks. The proposal has also been developed in consultation with TfNSW regarding site access to the eastern portion of the site via the Great Western Highway.

The final proposal has been assessed in detail having regard to its potential impacts, carefully considering the residential properties to the north and the heritage listed church to the east. The proposal represents the optimal outcome for the site, providing an appropriate outcome based on its context and the significant economic benefits associated with the investment in the Blacktown LGA and employment opportunities during the construction and operational phases.

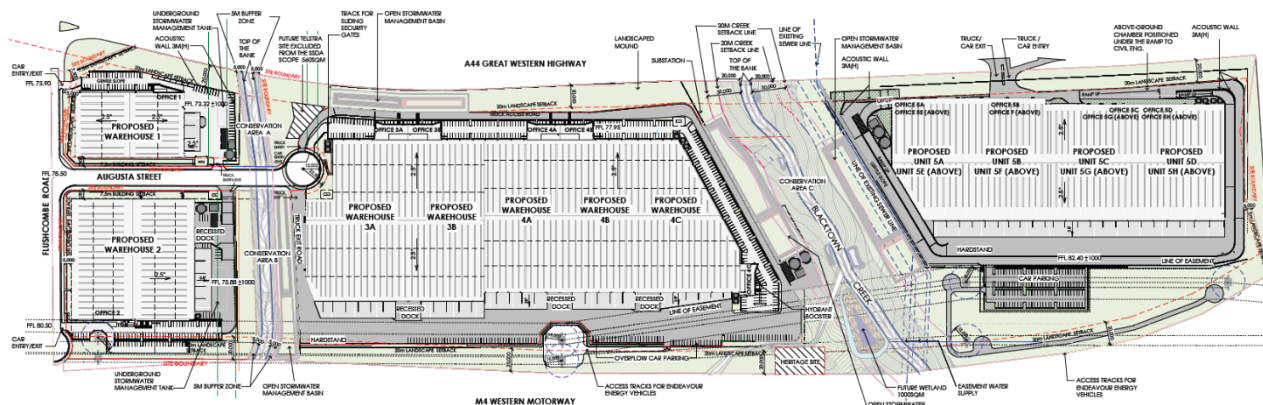
The Proposal

The project seeks to construct and operate a modern industrial warehouse and distribution precinct which responds to the site conditions. In summary, the proposed development involves:

- Site earthworks, including cutting and filling, required to deliver large-scale warehouse buildings..
- Construction and fit-out of four buildings (comprising 15 warehouse tenancies) including:
 - Warehouse Building 1, single-level (maximum building height 17.39m)
 - Warehouse Building 2, single-level (maximum building height 19.61m)
 - Warehouse Building 3 & 4, single-level (maximum building height 19.4m)
 - Warehouse Building 5, multi-level (maximum building height 34.84m)
- A total of 134,565m² of gross floor area (GFA) will be provided in the above buildings, comprising:
 - Warehouse: 128,027m²
 - Office: 6,538m²
- Vehicle access to Warehouses 1-4 is via Augusta Street and Flushcombe Road. A new intersection providing access from the Great Western Highway and Prospect Highway enables access to Warehouse 5.
- On-site car parking provision of 951 spaces, including an overflow car parking area to satisfy Council's parking requirements, as well as forecast demand.
- Riparian planting and landscaping within the conservation areas and along the site boundaries.
- Business and building identification signage.
- Consolidation of the existing lots and subdivision into three Torren title lots.

The SSDA does not include the remediation of the land or demolition of existing structures. These will be undertaken via exempt development and Complying Development Certificate (CDC) pathways.

Figure 2 – Proposed Masterplan



Source: Pace Architects

Consultation

Community and stakeholder engagement has been undertaken by LOGOS and the project team in the preparation of the SSDA. This includes direct engagement and consultation with:

- Government, agency and utility stakeholders as listed within the SEARs, including TfNSW regarding the connection of the site to the new Prospect Highway intersection and Blacktown City Council regarding the design principles and responding to community feedback.
- Registered Aboriginal Parties, including the Deerubbin Local Aboriginal Land Council and Darug Custodian Aboriginal Corporation.
- Surrounding landowners, Friends of St Bartholomew's, businesses and community members.

Each of the issues raised by the other stakeholders, including the relevant authorities, utility service providers, Aboriginal representatives and local community members, has been addressed in detail, including refinements to the architectural drawings and recommended mitigation measures to avoid, minimise or manage potential impacts.

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 project 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:

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

- **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 site is highly accessible to Western Sydney and the Greater Sydney area, with connections to the Great Western Highway, Prospect Highway and M4 Motorway.
- The proposal will optimise the use of vacant and cleared industrial zoned land to deliver warehouse and distribution premises to service the growing population in Western Sydney.
- The proposed development results in a built form which responds to the site controls and Blacktown Creek riparian corridor, reinvigorating the vegetation and waterway and providing for employee amenity and enhanced biodiversity outcomes.
- Introduce dense landscaping and acoustic mounds along the Great Western Highway will avoid unacceptable visual or noise impacts to the residential land north of the site.
- The design and layout responds to the functional and spatial requirements necessary to deliver a warehouse and distribution precinct and is compatible with the scale and character of other warehouse developments in the Western Sydney Employment Area.

▪ **The proposal is highly suitable for the site:**

The suitability of the site to accommodate the proposed development has been assessed in detail in the preparation of this EIS. This includes a comprehensive assessment of its consistency with the relevant strategic land use and transport policies and level of compliance with the statutory planning controls that apply to the site and the proposed development.

Each of the planning and technical specialist assessments have been considered in assessing the suitability of the site to accommodate the warehouse and distribution centre. The site is considered highly suitable for the proposed development for the following reasons:

- The proposed land use is permissible with consent in the IN1 General Industrial zone under the I&E SEPP.
- The proposal is 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.

▪ **The proposal is in the public interest:**

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

- The proposal will provide up to 651 full time jobs during the construction phase, and up to 908 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 redevelopment of the site will deliver critically needed industrial floor space close to Western Sydney. The Project is fully funded and 'shovel ready' for commencement of construction as soon as possible in Q2 2024.
- The proposal incorporates comprehensive landscaping to present an attractive appearance when viewed from the surrounding road network, minimise the potential visual impacts from the residential properties and heritage-listed church and enhance biodiversity outcomes. A comprehensive assessment has been undertaken of the potential environmental impacts and it has been demonstrated that all matters can be satisfactorily mitigated, minimised or managed to avoid any unacceptable impacts.
- The proposal meets sustainability benchmarks and incorporates innovative elements to achieve an environmentally responsible design.
- It can be concluded that on balance, the benefits of the proposal 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 section of the report identifies the applicant for the project and describes the site and proposed development. It outlines the site history and feasible alternatives explored in the development of the proposed concept, including key strategies to avoid or minimise potential impacts.

1.1. Applicant Details

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

Table 1 Applicant Details

Descriptor	Proponent Details
Full Name(s)	The Trustee for Huntingwood Property Trust
Postal Address	L29, Aurora Place, 88 Phillip Street, Sydney, NSW 2000, Australia
ABN	62 141 814 833
Nominated Contact	Athlete Kyle, AthleneKyle@logosproperty.com
Contact Details	0402 079 128

1.2. Project Description

This EIS is submitted to the Department of Planning and Environment (**DPE**) on behalf of the Trustee for Huntingwood Property Trust and in support of an application for SSD-36138263 at Augusta Street, Blacktown. The SSDA seeks consent for:

- Site earthworks, including cutting and filling, required to deliver large-scale warehouse buildings.
- Construction of four buildings comprising 15 warehouse tenancies with ancillary offices and a total GFA of 134,565m²
- Vehicle access via Augusta Street, Flushcombe Road and the Great Western Highway.
- On-site car parking provision of 951 spaces which meets authority requirements.
- Riparian planting and landscaping within the conservation areas and along the site boundaries.
- Business and building identification signage.
- Consolidation of the existing lots and subdivision into three Torren title lots.

The key objectives for the proposed development and the way in which these have been achieved are summarised in **Table 2**.

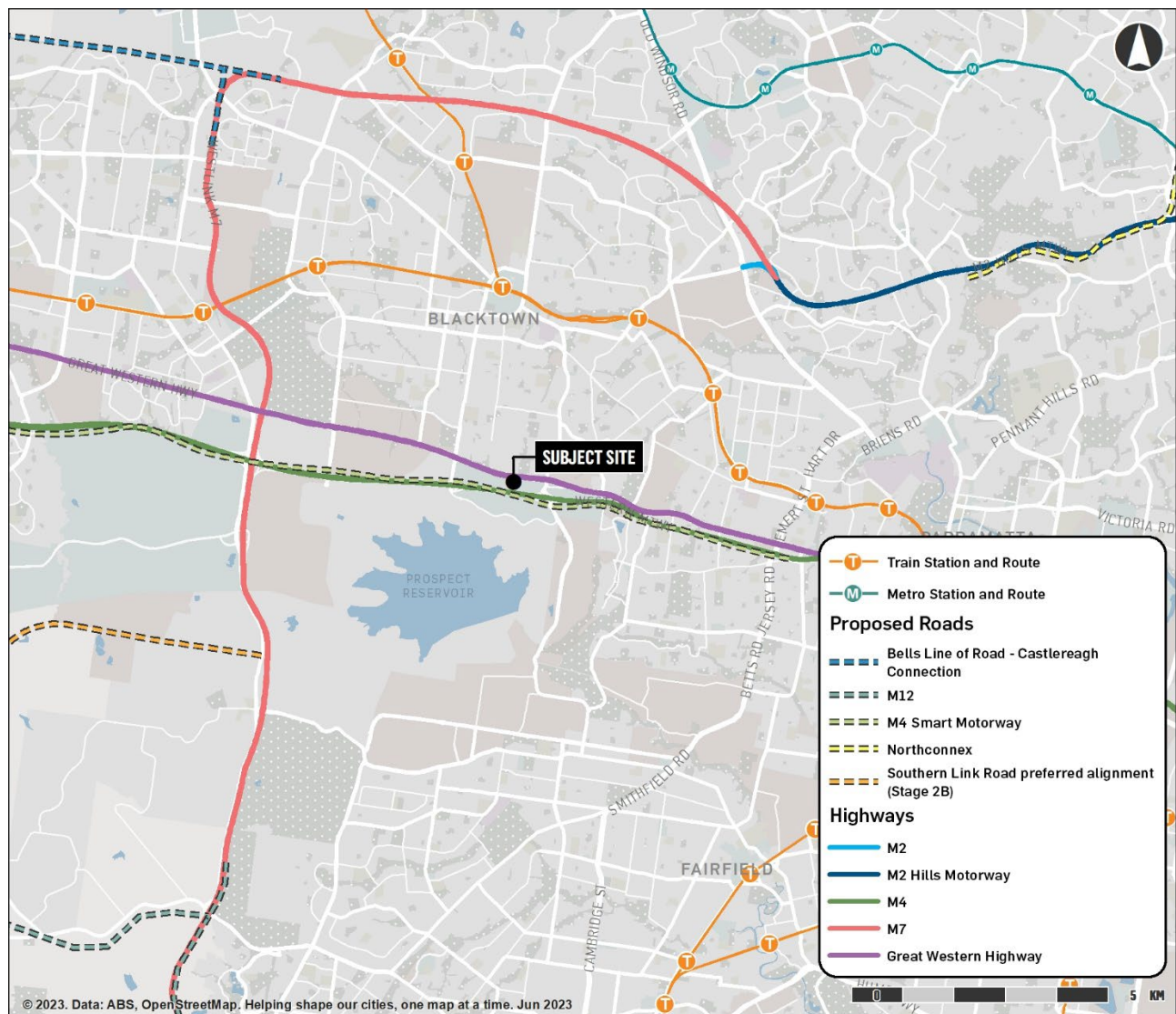
Table 2 Project Objectives

Project Objective	Proposed Development
Deliver a state-of-the-art industrial precinct to respond to the current market demands and tenant requirement for modern supply chain and distribution facilities and increased employment opportunities within Western Sydney.	The proposed development will deliver 134,565m ² of warehouse and distribution centre and office floor space to respond to tenant and market demands. 908 full-time jobs will also be provided during the operation of the industrial precinct, supporting job opportunities in the Blacktown and wider Western Sydney area.

Project Objective	Proposed Development
Appropriately site and design the buildings to achieve design excellence and respond to the surrounding local context, including the residential properties to the north and heritage-listed church to the east.	The final design of the industrial precinct is the result of an iterative design process in consultation with government agencies and Blacktown City Council. The final design appropriately sites the warehouse buildings having regard to the setback requirements and conservation areas in HDCP 2011. The design principles outlined Clause 2.30 of the I&E SEPP have been addressed by the final design, implementing a juxtaposition of typologies and articulated built form, complemented by a high quality landscape response and variety of materials and finishes. The design responds to the residential properties to the north through the architectural and landscape design as outlined above, as well as locating loading facilities generally to the south and providing for the mitigation of noise through landscape mounds and acoustic walls. The proposed development responds to the State heritage listed St Bartholomew's Church and Cemetery through the siting and design of the eastern warehouse and the delivery of landscaped screening within the eastern boundary.
Optimise the proximity of the site to the motorway network which provide connections from the site to the wider Sydney area via the Great Western Highway and M4 motorway.	The proposed development provides for high-quality warehouse and distribution centre floor space in an appropriate location which benefits from close proximity to the motorway network, enabling efficient freight access to the Greater Sydney area and beyond.
Provide significant landscape works along the site boundaries and within the conservation zones to enhance the biodiversity outcome, provide an attractive streetscape and on-site amenity for workers and visitors to the site.	9.4ha of landscaped area is proposed for the site. This includes the realignment revitalisation of the 1st Order Blacktown Creek riparian corridor producing a superior landscape and biodiversity outcome for the site.

A map of the site in its regional setting is provided as **Map 1**.

Map 1 – Regional Context



Source: Urbis

1.3. Project Background

1.3.1. Relevant History

The Trustee for Huntingwood Property Group (with LOGOS Property Group as development partner) purchased the majority of the site in late 2021 and early 2022. The remaining land parcels are in the process of being acquired from Blacktown City Council and Amplitel Pty Ltd. Landowners consent has been provided from all landowners to facilitate lodgement and assessment of the application.

Due diligence investigations undertaken by LOGOS to inform the land acquisition confirmed a SSDA had previously been lodged for a data centre to be developed across part of the site (SSD-10469). A detailed review of this proposal was undertaken to understand its scope and the reasons underlying the withdrawal of the application (refer **Section 2.3**). The key learnings from this review have been applied in the siting, design and assessment of the current proposal.

Significant consultation was undertaken with TfNSW during the preparation of the SSDA to facilitate agreement for a 'fourth leg' from a new intersection on the Great Western Highway. The delivery of access from the Great Western Highway provides significant benefits, including reducing the potential impacts on the Flushcombe Road intersection, as well as reducing the potential environmental impacts associated with a bridge crossing over Blacktown Creek.

1.3.2. Key Strategies

The following key strategies have been adopted to avoid, minimise or off-set the impacts of the project and having specific regard to a review of the previous proposal for the data centre which was withdrawn:

- The proposed earthworks have been designed to respond to the topography of the site and the surrounding landscape, reducing the potential height and visual impact of the proposed buildings.
- The siting and design of the warehouses has been given detailed consideration having regard to the design excellence provisions and proximity of the residential properties and heritage listed church. The final architectural design and landscape treatment were designed to provide an attractive appearance and avoid unacceptable visual impacts, delivering an appropriate outcome for the industrial zoned land.
- Ongoing negotiations with TfNSW were considered critical to achieving the optimal outcome for vehicle access to the site, avoiding significant impacts to the Flushcombe Road intersection and minimising ecological impacts on the Blacktown Creek corridor.

1.4. Related Development

A pre-lodgement meeting was held with Blacktown City Council on 16 May 2023 to discuss the proposed demolition of the existing mobile telecommunications facility and construction of a new mobile telecommunications facility and site associated works in a new location which will facilitate delivery of the logistics estate as outlined within this SSDA.

The replacement telecommunications facility will comprise one 40-metre-high monopole with a headframe atop to mount six panel antennas. A prefabricated equipment shelter at the base of the monopole will also form part of the proposal. In addition, it is noted that onsite vegetation will be required to be removed for the structures and for the temporary driveway access.

The Pre-Application Meeting (**PAM**) Report prepared by Council confirms the proposal is permitted with consent in the IN1 General Industrial zone under *State Environmental Planning Policy (Transport and Infrastructure) 2021* (Chapter 2, Division 21, Clause 2.143). The PAM Report also confirms the matters to be assessed within the Statement of Environmental Effects (**SEE**) and supporting plans and specialist reports.

A development application is currently being prepared by Urbis on behalf of LOGOS and Amplitel Pty Ltd for lodgement and assessment by Blacktown City Council.

1.5. Restrictions and Covenants

The site is affected by multiple easements and restrictions including (Refer to Site Survey at **Appendix F**):

- (A / A1 – A7 / B) – Multiple easements up to 30 metres wide for transmission lines operated by Prospect Electricity along the southern portion of the site.
- (C) – Drainage easement 2.44 metres wide running east-to-west to support a water course within the western portion of the site.
- (D) – 9 metre wide easement for construction purposes running north to south through the eastern portion of the site.
- (E) – Construction easement 3 metre wide related to construction of water supply infrastructure running north to south through the centre of the site.
- (F) – 10 metre wide easement for water supply purposes running north to south adjacent to the Blacktown Creek watercourse on the eastern portion of the site.
- (G) – 9 metre wide easement for construction works running parallel to easement '(F)' for water supply on the eastern portion of the site.
- (H) – Easement for transmission line within the other transmission line easements along the eastern portion of the site.
- (K) – 2.5 metre wide water supply easement running from the water hydrant along west to east along Augusta Street.
- (L) – 9.5 metre wide easement for overhead powerlines running along Augusta Street.

- (M) – Right of access 5 metre wide along Augusta Street benefiting Blacktown City Council.
- (N) – Proposed right of access 20.115 metre wide.

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 addressed in further detail in **Section 7** of this EIS.

2.1. Project Justification

The proposed development is aligned with the State, district and local strategic plans and policies applying to the site as outlined below.

2.1.1. NSW State Priorities

The former Premier of NSW identified 14 priority areas essential for the growth and development of NSW. It is understood the new Premier is yet to confirm his priority areas. The proposal is consistent with the previously identified priority matters as summarised below:

- **Greening our City** – the proposal will achieve a 16.23% tree canopy coverage, with significant landscaping within the site boundaries and conservation zones.
- **Well Connected Communities with Quality Local Environments** – the proposal will support the delivery of floorspace and supply chain industries critical to meet the needs of population growth.
- **A Strong Economy** – the proposed development will deliver a significant investment of \$446 million and generate 908 jobs which are well located close to existing road networks within Western Sydney.

Based on the above, the proposal satisfactorily responds to the current NSW State Priorities.

2.1.2. 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, 817,000 new jobs and a requirement of 725,000 new homes by 2036.

The proposal is consistent with the strategic directions and objectives identified in the Greater Sydney Region Plan through the contribution of additional high quality industrial floor space in an appropriately located warehouse and logistics park. Through the delivery of an envisaged warehouse and distribution centre contemplated under SSD-36138263, the use responds to the objectives of the Region Plan as follows:

- *Objective 4. Infrastructure use is optimised*

The proposal will optimise the use of the existing motorway and local road network, as well as the new intersection with the Great Western Highway and connection to the Prospect Highway.

- *Objective 15 – The Eastern, GPOP and Western Economic Corridor are better connected and more competitive.*

The economic investment and employment generation provided by the proposed warehouse and distribution centre will assist in driving the competitiveness of Western Sydney particularly within Greater Sydney.

- *Objective 16 – Freight and logistics network is competitive and efficient.*

The proposed development will provide 15 warehouse and distribution tenancies which will support to the freight and logistics network in Western Sydney. The proposal optimises the zoning of the site for industrial uses, as well as its proximity to two major road networks and a growing residential population.

- *Objective 17 – Regional connectivity is enhanced.*

The proposed development will deliver a competitive and efficient freight and logistics network which benefits from excellent regional connections, contributing to warehouse and distribution capacity of the Western Sydney.

- *Objective 22 – Investment and business activity in centres.*

The proposed development will support the Blacktown strategic centre through the delivery of additional floorspace which supports supply chain industries, including warehousing of goods pending their sale.

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

The proposal will facilitate the development of industrial zoned land and increased employment opportunities in an area close to other employment generating development and a growing residential population.

- *Objective 28. Scenic and cultural landscapes are protected*

Careful consideration has been given to nearby residential properties and the heritage listed church in the siting and design of the proposed buildings and delivery of significant landscaping within the setbacks and conservation zones,

- *Objective 30. Urban tree canopy cover is increased*

The proposal will deliver a tree canopy cover which equates to 16.23% of the site, off-setting the proposed removal of trees to accommodate the proposed warehouse buildings and delivering a high-quality visual appearance.

- *Objective 35. More waste is re-used and recycled to support the development of a circular economy*

The proposal incorporates a range of sustainability initiatives to encourage waste re-use and recycling during the construction and operational phases of the development.

2.1.3. 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 planning priorities relating to infrastructure provision, establishing land use and transport structure, environmental protection and growing investment, business opportunities and jobs in strategic centres. 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 as follows:

- *Planning Priority N1. Planning for a city supported by infrastructure*

The site is well located to optimise road transport infrastructure adjacent to the site, including the existing motorways and proposed new intersection on the Great Western Highway.

- *Planning Priority C9 – Delivering integrated land use and transport planning and a 30-minute city.*

The proposal will provide for growing investment and business opportunities in warehouse storage and logistics facilities, investing in providing access to jobs in an interconnected site, as well as contributing to the Blacktown 2036 job target overall.

- *Planning Priority C11 – Maximising opportunities to attract advanced manufacturing and innovation in industrial and urban services land.*

The proposal will also maximise opportunities to attract advanced manufacturing and innovation in an industrial and urban serviced land by reducing the 61ha of undeveloped land in Huntingwood and providing 134,565m² of high quality warehouse and distribution and ancillary office floor space.

- *Planning Priority C12. Supporting growth of targeted industry sectors*

The proposal will result in a significant investment and innovation in industrial and urban services land, including delivery of local jobs and floorspace which meets the needs of Western Sydney.

2.1.4. 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 is generally 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.

2.1.5. 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 20-year planning vision is to deliver ‘a planned city of sustainable growth, supported by essential infrastructure, efficient transport, a prosperous economy and equitable access to a vibrant, healthy lifestyle’. The plan segregates the LGA into four distinct precincts. Of these precincts the site forms part of the Blacktown Precinct. Informed by the District Plan, the LSPS establishes a range of priorities under the indices comprising ‘infrastructure and collaboration’, ‘liveability’, ‘productivity’ and ‘sustainability’. The following priorities are of relevance to the proposal:

- *Local Planning Priority 7. Delivering integrated land use and transport planning and a 30-minute city*

The proposal will deliver additional jobs in close proximity to homes and transport infrastructure. By providing more jobs in the Blacktown Precinct, the proposal will assist in increasing resident’s access to local employment opportunities.

- *Local Planning Priority 2. Collaborating, partnering and engaging to implement the LSPS*

The proposal has been developed in consultation with key government and public stakeholders including Council, the DPE, the Aboriginal community and local land owners and residents.

- *Local Planning Priority 3. Providing services and social infrastructure to meet people's changing needs*

The proposal will deliver a logistics estate that will support supply chain industries and accommodate the needs of a growing residential population, including surrounding employment lands and the Strategic Centre of Blacktown.

- *Local Planning Priority 4. Respecting heritage and fostering healthy, creative, culturally rich and socially connected communities*

The specialist reports have addressed the potential archaeological, heritage and biodiversity impacts of the proposal. The buildings have been sited and designed to avoid unacceptable impacts to the heritage-listed church and optimise the site landscaping, including within the conservation zones.

- *Local Planning Priority 8. Growing mixed use, investment, business and job opportunities in Strategic Centres*

The site is located to the south of the Blacktown Strategic Centre. The proposal will provide high quality industrial floor space which will support jobs growth and investment in proximity to the Strategic Centre which has the potential to support agglomeration benefits.

- *Local Planning Priority 13. Protecting and enhancing bushland, biodiversity and scenic and cultural landscapes*

The site has been designed to avoid bushfire risk and unacceptable ecological impacts. Detailed consideration was given to the siting and design of the buildings and provision of complementary landscaping which will minimise the visual impacts of the proposal having regard to existing views from the nearby residential properties and heritage listed church.

2.2. Key Features of Site and Surrounds

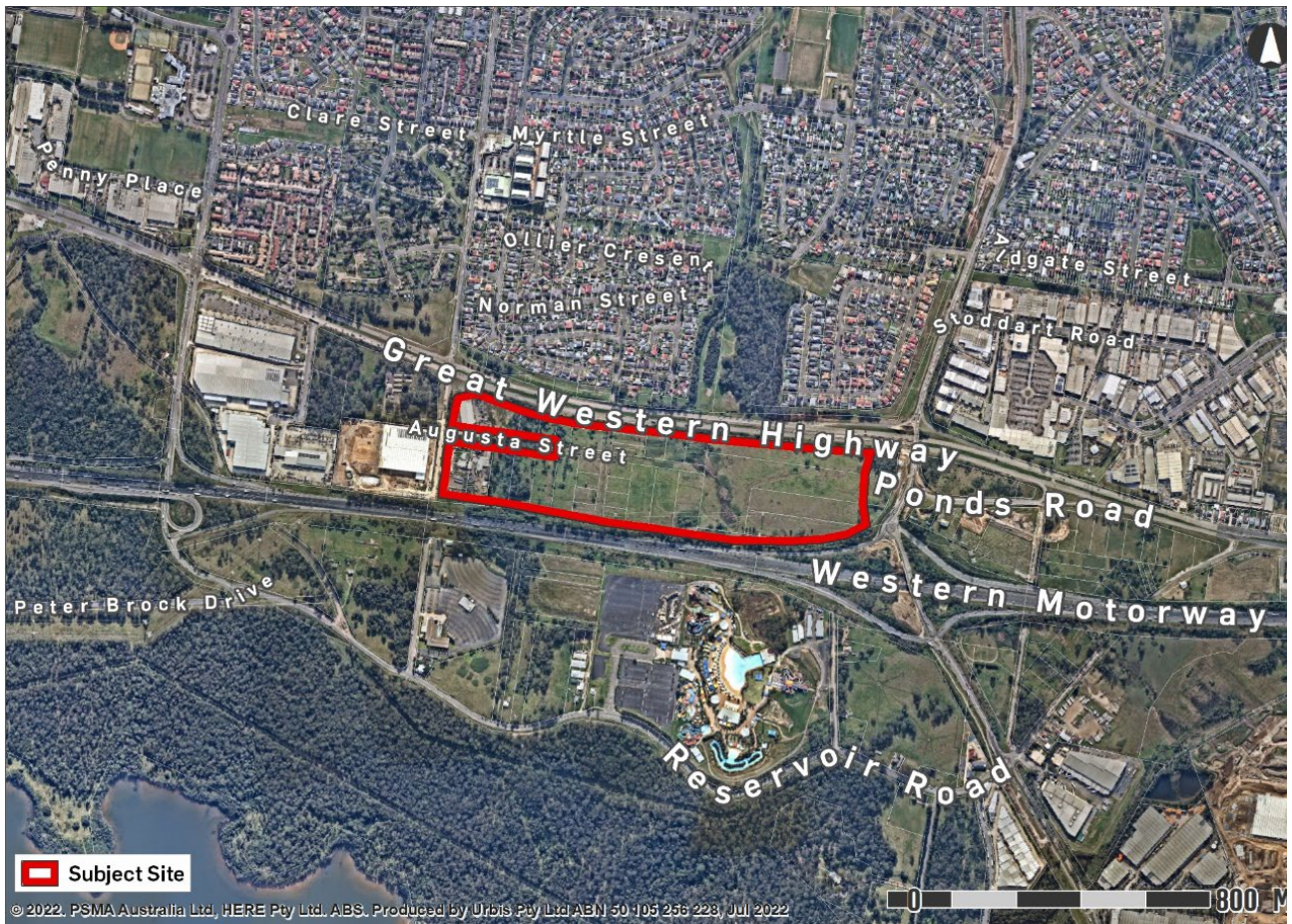
The site is located at Augusta Street, Blacktown within the Blacktown local government area (**LGA**). The site is legally described as Lot 1 DP835264, Lots 218-219 DP457024, Lot 2151 DP135859, Lot 2 DP516449, Lot 163-164, 168-188 and 216 DP8716, Lot 1 DP119616, Lots 4-6 DP226294, Lots 50-52 DP1144623, Lot 7 DP803359, Lots 6-10 DP801210, Lot 4 DP585492, Lot 4 DP583442, and Lot 2 DP1263824.

The site is approximately 26.64 hectares in area. Access to the site is currently obtained via Augusta Street which connects to Flushcombe Road to the west. Flushcombe Road intersects with the Greater Western Highway, providing east-west access to the metropolitan road network.

The majority of the site is currently owned by Huntingwood Property Trust. Land owners consent has been obtained from the current owners of the remaining land which is to be acquired (ie Blacktown City Council and Amplitel Pty Ltd) to facilitate lodgement of the application.

The location of the site is illustrated in **Map 2**. Photographs of the current site condition are provided in **Figure 3** and **Figure 4**, with photographs of the surrounding locality in **Figure 5**.

Map 2 – Local Context



Source: Urbis

Figure 3 – Site Photographs



Picture 1 Road closure at the end of Augusta St

Source: Google Maps, 2023



Picture 2 View of site from Great Western Hwy

Source: Google Maps, 2023

Figure 4 – Wider Site Context (March 2023)

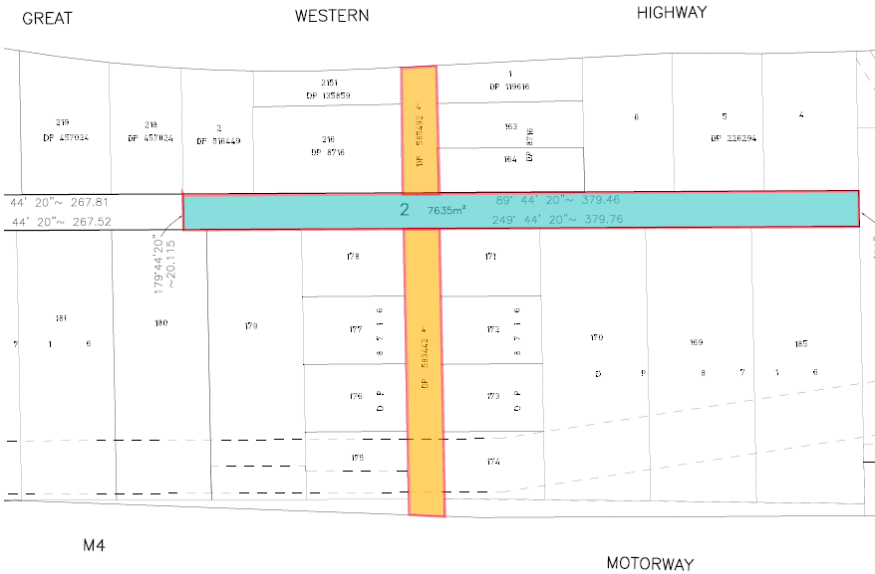


Source: LOGOS

The key features of the site which have the potential to impact or be impacted by the proposed development are summarised in **Table 3**.

Table 3 Key Features of Site and Locality

Descriptor	Site Details
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 south eastern part of the site sits above the Prospect Highway, with a landscaped embankment impeding views across the site from the east.
Land Ownership	Huntingwood Property Trust (with LOGOS as development partner) currently own most of the site with agreements in place to purchase the lots currently owned by Blacktown City Council and Amplitel Pty Ltd. A brief description of the lots not owned by LOGOS can be found below. - Blacktown City Council (Lot 4 in DP585492, Lot 4 in DP583442 and Lot 2 in DP1263824): these parcels of land were intended for future roads, including the extension of Augusta Street and a north-south road link, neither of which is required by Blacktown City Council. An extract of the site plan can be found below. - Amplitel Pty Ltd (Lot 164 in DP 8716): this land accommodates a Telstra mobile telecommunications facility which is to be relocated via a separate DA as discussed in Section 1.4.

Descriptor	Site Details
	Owner's consent has been provided by Blacktown City Council and Amplitel Pty Ltd to facilitate the lodgement and determination of this SSDA.  The diagram illustrates the site's location relative to the Great Western Highway and the M4 Motorway. The site is a rectangular plot of 76,35m², highlighted in red. It is situated between the highway to the north and the motorway to the south. The plan includes various lot numbers and dimensions, such as 44' 20" ~ 267.81, 44' 20" ~ 267.52, 89' 44' 20" ~ 379.46, and 249' 44' 20" ~ 379.76. The site is also adjacent to the M4 Motorway, which is labeled as 'M4 MOTORWAY'.
Existing Development	The site is undeveloped with scattered trees located along the western and southern boundaries as well as in the north-eastern corner. Blacktown Creek runs north-south through the central part of the site with riparian vegetation along the corridor. The western portion of the site contains several buildings, including a commercial warehouse, and four abandoned dwellings. 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 on the western part of the site. This is to be relocated as part of a separate DA lodged with Blacktown City Council for assessment concurrently with this SSDA. There are electrical transmission lines (and towers) that run along the southern boundary, as noted on title as an electrical easement.
Local Context	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 the site from the Prospect Highway. St Bartholomew's Church and Cemetery is located on the eastern side of the 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

Descriptor	Site Details
	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. Photographs of the surrounding land uses are provided at Figure 5.
Regional Context	The site is approximately 34km west of the Sydney CBD and approximately 3.3km south of the Blacktown commercial centre. The region features a mix of land use, including residential and employment-generating activities. The Huntingwood and Pemulwuy industrial estates are located to the west and south-east. The Prospect Reservoir is approximately 1km south of the site adjacent to the Western Sydney Parklands.
Infrastructure	The site features high voltage power lines along the southern boundary of the site. 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 to the site is a bus stop approx. 700m north on Flushcombe Road providing the 722 bus service to Blacktown Station.
Site Access	The site is currently 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.
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.

Descriptor	Site Details
	Telecommunications - A Telstra mobile phone facility is centrally located on the development site. The developer is in negotiations with Telstra to relocate the facility via a separate development application. 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.
Acid Sulphate Soils	Blacktown City Council online maps and investigations by JBS&G at Appendix U confirm the site is not likely to be affected by acid sulfate soils materials.
Contamination	A Detailed Site Investigation (DSI) (Refer to Appendix W) has been prepared by JBS&G, dated 22 July 2022 with regard to the site. Bonded Asbestos Contaminated Material (ACM) were identified on the ground surface, within stockpiled material, and within borehole and test pit sample locations around the site with impacts identified on the ground surface in the western portion of the site. Further, Total Recoverable Hydrocarbons (TRH) within surface sample locations at the north-western and south-western portions of the site, in proximity to the existing buildings onsite, have been identified as exceeding the management limits and ecological criteria. A Remediation Action Plan has been prepared (Refer to Appendix X) and mitigation measure for remediating the contaminated land onsite is contained at Section 6.2.8. The RAP has identified the site as requiring Category 2 remediation works which can be undertaken as exempt development. As such, the scope of remediation works has not been included in the SSDA.
Stormwater and Flooding	The site is currently 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 have confirmed 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. A bushfire assessment is contained in Appendix EE .

Descriptor	Site Details
Flora and Fauna	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. From surveys of the site, no candidate species were identified onsite.
Aboriginal Heritage	As detailed in the Aboriginal Cultural Heritage Assessment Report (ACHAR) at Appendix AA , 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	The site does not have any items of heritage significance nor is it within a heritage conservation area. As identified in the Heritage Impact Statement (Refer to Appendix BB), 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 – Locality Images



Picture 3 View of the site from residential area to the north of the Great Western Highway

Source: Google Maps, 2023



Picture 4 Vegetated undeveloped landscape onsite

Source: Google Maps, 2023



Picture 5 Animal holding centre west of the site

Source: Google Maps, 2023



Picture 6 Logistics facility west of the site

Source: Google Maps, 2023

2.3. Development History

A previous SSDA was lodged by Airtrunk Pty Ltd seeking development consent for the construction of a data centre (SSD-10469). SEARs were issued by the DPE on 29 June 2020 which described the proposal as follows²:

Construction and operation of a data centre, comprising:

- 16 data halls
- two electrical substations
- two diesel fuel storage tanks
- ancillary office and support area
- associated infrastructure, carparking, loading areas and landscaping

SSD-10469 was formally withdrawn via written correspondence prepared by Airtrunk and dated 25 August 2021. The withdrawal of the application was made primarily based on concerns raised by the DPE regarding the bulk, scale and aesthetics of the proposed design and having specific regard to the sensitive viewpoints from the nearby residential properties.

Consideration was also given to Council's objection to the proposal. Airtrunk advised further changes to the proposal, including reduced building heights, would not be viable³. Each of the matters identified within the withdrawal of the SSDA as described above were considered during the refinement of the architectural and landscape drawings and within the environmental impact assessment of the proposal as outlined in **Section 6** of this EIS.

A separate DA is being prepared which seeks approval from Blacktown City Council to relocate the Telstra Mobile Tower onsite to approximately 170 metres to the west of its current location.

² <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-10469%2120200629T045508.597%20GMT>, downloaded 13 July 2023

³ <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-10469%2120220116T232449.061%20GMT>, downloaded 13 July 2023

2.4. Cumulative Impacts with Future Projects

The site is located within the Western Sydney Employment Area within the suburb of Blacktown. The surrounding land includes a variety of land use activities, including residential, commercial, retail, and recreational uses. Approved and likely future developments which may be relevant in the cumulative impact assessment of the proposal are summarised in Table 4.

Table 4 Approved and Likely Future Development

Address	DA Reference	Development Description	Current Status
Approved Development			
65 Huntingwood Drive, Huntingwood	SSD-17352813	Huntingwood Processing Facility Expansion – construction and operation of a new Arnott's food processing (bakery) facility, new additional ancillary structures including ingredient silo building, processing building and storage building.	Approved 1 July 2022
421-427 Flushcombe Road, Blacktown	DA-20-00119	Designated Development for the construction and operation of a warehouse and distribution centre to operate 24 hours per day, 7 days a week.	Approved 10 August 2021
24 Healy Circuit, Huntingwood	SPP-19-00014	Demolition of the existing warehouse facility and construction of a data centre including car parking and amenities.	Approved 26 March 2020
90 Peter Brock Drive, Eastern Creek	SPP-19-00009	Partial demolition of an existing data centre and the construction of an eight-storey extension and associated works.	Approved 16 November 2020
170 Reservoir Road, Arndell Park	SPP-20-02086	Construction of a 9 x 3-7 storey seniors housing development including a residential aged care facilities which will deliver 480 self-contained dwellings & 160 residential aged care facility beds, 628 car parking spaces within the basement level, 2x community centres, pool facility, indicative network of streets, public & private communal open space, and through-site links.	Approved 14 June 2022
44 Clunies Ross Street, Prospect	SSD-10399	Prospect Logistics Estate – comprising construction, fit out, and operation of five warehouses, offices, a café, and associated infrastructure	Mod 5 Under Assessment

Address	DA Reference	Development Description	Current Status
		with a combined gross floor area of 95,150sqm. Mod 5 seeks minor changes to the approved building materials, including translucent roof sheeting and extension to the awning.	
Lot 7, LHIBH, 165 Wallgrove Road and 475 Ferrers Road, Eastern Creek	SSD-9667 SSD-34991713 SSD-49584708 SSD-49400209	Multiple applications have been lodged for the delivery of warehouse or distribution centres in accordance with an approved Concept Plan. Each of the SSDAs is accompanied by a modification to the original approval.	SSD-9667 – Mods 2 and 3 Under Assessment SSD-34991713 - Approved 17 April 2023 SSD-49584708 – Response to Submissions SSD-49400209 – Response to Submissions
Likely Future Development			
554-562 Reservoir Road, Prospect	SSD-9577613	Construction of two new cold store buildings and ancillary operation staging areas, new plants rooms, new entry gate, and other minor amendments. Construction and upgrade of carparking areas.	Request for Additional Information
51 Huntingwood Drive, Huntingwood	SSD-415589232	Construction and operational use of a 7-storey data centre with car park.	Request for Additional Information

The potential cumulative impacts of the project are addressed in **Section 6** and **Section 7** of the EIS in accordance with the DPIE *Assessing Cumulative Impacts* guidelines.

2.5. Agreements with Other Parties

LOGOS has agreed to acquire land from Blacktown City Council and Amplitel Pty Ltd as outlined throughout this report, including the description of the current land ownership in **Section 2.2**. The applicant is seeking to enter into an agreement with Amplitel Pty Ltd to facilitate the proposed replacement of a telecommunication facility as outlined in detail within **Section 1.4** of this EIS.

2.6. Feasible Alternatives

Clause 192(c) of the *Environmental Planning and Assessment Regulation 2021 (EP&A Regulation)* requires an analysis of any feasible alternatives to the proposed development, including the consequences of not carrying out the development.

LOGOS has identified four project alternatives which were considered in respect to the identified need for the warehouse and distribution centre. Each of these options is listed and discussed in **Table 5**.

Table 5 Project Alternatives

Option	Assessment
Option 1 - Do Nothing	The option to leave the site in its current condition was considered and dismissed. The 'do nothing' approach would fail to realise the potential economic benefits associated with site, including delivery of employment generating floor space which supports the productivity of the region and broader economy.
Option 2 - Alternative Location	LOGOS undertook extensive research and investigations to identify industrial zoned land available for purchase and development within Western Sydney. There is a critical under-supply of zoned and serviced land which is suitable to meet the needs of modern day warehouse and logistics tenants. There were no other sites available which met the criteria established by LOGOS to deliver the project objectives.
Option 3 – Alternative Design	Multiple concept designs were tested by the applicant in consultation with Blacktown City Council and State Agencies, including DPE and TfNSW, to maximise the site potential while minimising potential biodiversity, traffic, and building bulk impacts. Consideration was given to multiple alternative designs, including development options which provided all vehicle access from Flushcombe Road and various design iterations and architectural treatments. Each of these options was assessed and ultimately dismissed based on the potential impacts on the site and surrounding locality, including traffic, noise, ecological, visual and other amenity impacts.
Option 4 – The Proposal	The preferred design and layout has been progressed and refined in-line with recommendations from Blacktown City Council regarding the design excellence provisions, including the architectural treatment of the buildings and the landscaped setbacks. The proposal has also been developed and in consultation with TfNSW regarding site access to the eastern portion of the site via the Great Western Highway. The final proposal has been assessed in detail having regard to its potential impacts, carefully considering the residential properties to the north and the heritage listed church to the east. The proposal represents the most strategically viable and best outcome development for the site for the following reasons: ▪ The proposal promotes the efficient use of a mostly vacant site, which is sympathetic to the existing environment while still contributing significantly to the economy. ▪ The proposed use is permitted with consent in the IN1 General Industrial zone and appropriately located within the Western Sydney Employment Area.

Option	Assessment
	▪ The proposal will provide much needed logistics floor space within Western Sydney and is well-located with access to two motorways that connect the site to Sydney's major economic corridors. ▪ The proposal has been designed to respond to the surrounding development and local context, minimising impact on the environment and implementing suitable mitigation measures where required. ▪ The proposed siting of the warehouse and distribution centre minimises potential impacts on the site and amenity of the locality, including appropriate measures to mitigate, minimise or manage potential impacts during the construction and operational phases.

Based on the above analysis of feasible alternatives, LOGOS identified Option 4 as their preferred option and have advanced the preparation of this EIS to assess the environmental impacts of the proposal and obtain approval for this development.

3. Project Description

The following section of the EIS summarise the key numeric components of the proposed development and describe the site preparation, construction and operational phases in further detail.

3.1. Project Overview

The key components of the proposed development are summarised in **Table 6**. A copy of the architectural drawings are provided at **Appendix G**.

Table 6 Project Details

Descriptor	Project Details
Project Area	The site has a total area of 26.64ha. The entire site is expected to be physically disturbed by the project.
Site Description	- Lot 1 DP835264 - Lots 218-219 DP457024 - Lot 2151 DP135859 - Lot 2 DP516449 - Lot 163-164, 168-188 and 216 DP8716 - Lot 1 DP119616 - Lots 4-6 DP226294 - Lots 50-52 DP1144623 - Lot 7 DP803359 - Lots 6-10 DP801210 - Lot 4 DP585492 - Lot 4 DP583442 - Lot 2 DP1263824
GFA	Total GFA of 134,565m² broken down as follows: - Warehouse: 128,027m² - Ancillary Office: 6,538m²
Maximum Height	- Warehouse 1: 17.39m - Warehouse 2: 19.61m - Warehouses 3 & 4: 19.4m - Warehouse 5: 34.84m
Car Parking	951 car parking spaces
Motorcycle Parking	23 spaces

Descriptor	Project Details
Bicycle Parking	85 spaces
End of Trip Facilities	Secure bicycle parking areas with employee amenities including change rooms and shower facilities provided as part of the office tenancies.
Loading Facilities	Recessed docks and/or external covered loading bays to service each tenancy
Landscaped Area	9.4 hectares
Hours of Operation	24 hours per day, 7 days per week.
Jobs	Construction Phase – 651 jobs Operational Phase – 908 full time jobs
Capital Investment Value	\$446,000,000.00

3.2. Detailed Description

3.2.1. Project Area

The scope of the works applies to all the land contained within the nominated site area. The entire site area will be disturbed by the proposed development. However, only limited works will be undertaken within the southern area which is affected by an easement associated with the electrical transmission lines and towers. Site demolition and remediation works will be undertaken separately via exempt and complying development pathways.

3.2.2. Site Preparation Works

3.2.2.1. Demolition and Remediation

The existing buildings and structures will be demolished in accordance with a separate CDC. On this basis demolition of existing buildings does not form part of this SSDA.

Remediation works have been confirmed as Category 2 works which do not require development consent. Accordingly, it is proposed to undertake the required site remediation once the demolition of the existing buildings / structures have been completed in accordance with the relevant CDC.

3.2.2.2. Tree Removal and Earthworks

As outlined in the Landscape Plan (refer to **Appendix N**), the proposal requires the removal of 501 existing trees. 139 trees will be retained and supplemented with additional planting to off-set the impacts of the trees to be removed. These trees form part of the 0.52ha of native vegetation clearing, which has been classified as degraded and less degraded within the BDAR at **Appendix P**.

The following site preparation works will be undertaken as identified in the Civil Engineering Report and Plans prepared by Costin Roe (Refer to **Appendix V**):

- A Sediment and Erosion Control Plan will be implemented to mitigate any impacts to downstream drainage systems and to protect receiving waters from sediment laden runoff across the site, specifically to the two watercourses running through the site.
- Bulk earthworks will be required to facilitate the proposed warehouse buildings. The earthworks are required to provide large flat building pads, hardstand areas and car parking areas for each of the warehouse buildings. The finished floor levels (**FFLs**) for each warehouse pad are as follows:
 - Warehouse 1: RL72.75m AHD

- Warehouse 2: RL76.00m AHD
 - Warehouse 3: RL78.10m AHD
 - Warehouse 4: RL79.30m AHD
 - Warehouse 5: RL85.30m AHD
- Approximately 70,650m³ of additional cut is required to minimise the extent of retaining walls and accommodate the required FFLs.
 - Retaining walls will be required across the entire site as part of the site preparation works. Retaining walls will have maximum heights of 8 metres. Permanent batters will be vegetated and have a maximum grade of 2.5 horizontal to 1 vertical, while temporary batters will be a maximum of 2 horizontal to 1 vertical.

3.2.3. Warehouse Layout and Design

3.2.3.1. Site Layout

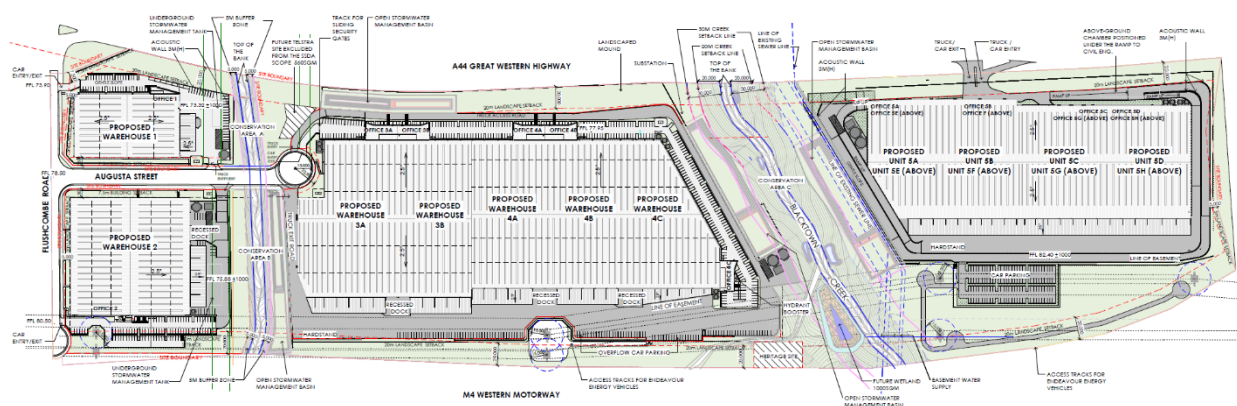
The site layout comprises four buildings located across the eastern and western parts of the site as shown in **Figure 6**. Landscaped setbacks are provided along each of the site boundaries. Several noise barriers are provided to the rear of the landscaped areas along the northern boundary to minimise potential acoustic impacts from heavy vehicle movements and loading activities on the residential properties to the north.

The site layout has been designed to accommodate the existing public road access via Augusta Street and Flushcombe Road. A new access point is to be delivered from the Great Western Highway to the eastern part of the site, comprising a 'fourth leg' of a new intersection being delivered by TfNSW to improve connectivity with the Prospect Highway. All other access points will be via Augusta Street and Flushcombe Road, minimising potential impacts on the classified roads and optimising the landscaped screening.

The layout also responds to the conservation zones which run-north south across the site, including Blacktown Creek. Riparian areas and landscaped buffer zones are provided to enhance the ecological outcomes associated with the proposal. Stormwater management basins are located adjacent to the riparian and buffer zones to manage stormwater quantity and quality impacts.

The proposed layout responds to the site constraints, including multiple utility service easements. Overflow car parking spaces are to be located below the electrical easement to 'future-proof' the development and accommodate increased parking demand beyond the forecast rates. The southern landscaped setback will include the protection of the artefact scatter within the electrical easement during the construction phase.

Figure 6 – Site Masterplan



Source: PACE Architects

3.2.3.2. Design and Built Form

The detailed design of each of the warehouse buildings is described as follows:

- Warehouse 1 (West):
 - 5,461m² of warehouse area with one recessed dock and two external loading bays with associated hardstand manoeuvring area along the western elevation.

- 474m² office area with ground level lobby and first floor office facilities inclusive of one lift core, a lunchroom area, and employee amenities including shower facilities and a covered balcony area.
- Car parking along the northern and eastern hardstand components of Warehouse 1, inclusive of electric vehicle and accessibility spaces. Pedestrian pathway for employees has been provided along the northern façade adjacent to the primary car parking area.
- Warehouse services such as a pump room, sprinkler tank, and substation have been included in the southeastern corner of the hardstand area.
- Warehouse 2 (West):
 - 11,668m² of warehouse area with one recessed dock and four external loading bays with associated hardstand manoeuvring area along the western elevation.
 - 363m² office area with ground floor office facilities and first floor amenities inclusive of one lift core, lunchroom, covered outdoor breakout spaces, and lobby.
 - Car parking along the southern hardstand component of Warehouse 2, inclusive of electric vehicle and accessibility spaces. Pedestrian pathway for employees has been provided along the southern façade adjacent to the primary car parking area.
 - Warehouse services such as a pump room, sprinkler tank, and substation have been included in the southeastern corner of the hardstand area.
- Warehouses 3 and 4 (Centre):
 - 49,455m² of warehouse area with 12 recessed docks, 22 external loading bays with associated hardstand manoeuvring area along the southern elevation. There are five warehouse tenancies within these two adjoining buildings.
 - 2,411m² of office area is provided along the north and eastern façade, with ancillary office space allocated for each of the individual tenancies. All tenancies include a ground floor lobby, breakout space, and changing room areas with the main office and employee amenity on the first floor with lunchrooms, the kitchen and a second covered external breakout space.
 - Car parking is along the north and east façades, including undercroft areas below the first level offices and inclusive of electric vehicle and accessibility spaces. A pedestrian pathway is provided along the same facades with pedestrian crossings to assist with permeability of the car park area.
 - Warehouse services such as a pump room and sprinkler tank have been provided at the southwestern corner on the hardstand. A substation has been included adjacent to the turning circle on the western side of the warehouse and has been screened by a 2400mm high precast concrete panel.
- Warehouse 5 (East):
 - 61,443m² of warehouse area with seven recessed docks, 35 external loading bays with associated hardstand manoeuvring area across the two levels of the multi-storey warehouse. There are eight warehouse tenancies within this building, four on each level. Access for heavy vehicles is via ramps along the northern and western elevations.
 - 3,290m² office area is provided along the northern façade with ancillary office space allocated for each of the individual tenancies. All tenancies include a ground floor lobby, breakout space, and changing room areas with the main office and employee amenity on the first floor with lunchrooms, the kitchen and a second covered external breakout space.
 - Car parking is within an undercroft parking area below the first level of warehouse floorspace. Car park access is delineated from the heavy vehicle entry way to the ramps, with overflow car parking provided south of the warehouse. Access paths for the electricity provider has been provided south of the warehouse to service the transmission tower easement.
 - Warehouse services such as a pump room, sprinkler tanks, and two substations have been provided at the northeastern corner at the undercroft level on hardstand. The substation has been screened via a 2400mm high precast concrete panel.

The fit-out of the warehouse and ancillary office space within each tenancy is shown in the architectural drawings. Indicative racking layouts have been provided based on the speculative nature of the proposal. The racking may be modified to tenant specification during the post consent detailed design phase, subject to further planning approvals as required.

The proposed development reflects best-practice design to deliver a modern logistics precinct for warehouse and distribution uses. The architectural drawings have responded to feedback from Blacktown City Council including refinements to the built form and architectural treatments to deliver design excellence.

The proposed development locates the single storey warehouse components to the western portion of the site and the multi-storey warehouse to the eastern portion, leveraging the site topography. The proposed maximum building heights as measured from the existing ground level to the uppermost part of the individual buildings are described below:

- Warehouse 1: 17.39 metres
- Warehouse 2: 19.61 metres
- Warehouse 3 & 4: 19.4 metres
- Warehouse 5: 34.84 metres

The Great Western Highway elevation has been carefully designed to minimise the potential visual impacts to the residential receivers to the north. This includes the location and design of mezzanine office elements within Warehouses 3, 4 and 5 to articulate the buildings and create depth in these facades. The 20-metre landscape setback along the Great Western Highway includes extensive landscaping to further soften the façade. Additional landscaping is provided to the eastern, western and southern boundaries, supplementing the existing trees with additional planting.

The materials and finishes implemented for the proposed warehouses, a combination of monument, windspray, white and shale grey prefinished profiled metal cladding colours, create rhythm and interest in the façade, punctuated by protruding office elements introducing aluminium timber-look cladding, orange and white pre-finished metals. The location and design of the truck ramps for Warehouse 5 along the northern and western façades serve as a focal design point for the site, utilising perforated façade materials to add texture to the warehouse design.

PV solar panels are distributed across the roofs of all warehouse buildings to reduce operational energy and greenhouse gas emissions. All panels will be slightly angled to capture sunlight. Rainwater harvesting systems are also proposed for all warehouses, filtering into each warehouse's rainwater tank for reuse in operation.

A 3m acoustic mound is proposed along the northern boundary adjacent Warehouse 4 in-line with the recommendations of the Noise and Vibrations Impact Assessment (**NVIA**). Further, 3m acoustic walls are proposed along the western corner of Warehouse 5 as well as along the proposed ramp elements to Levels 1 and 2.

Figure 7 – Proposed Renders – Warehouse 1, 3 and 5



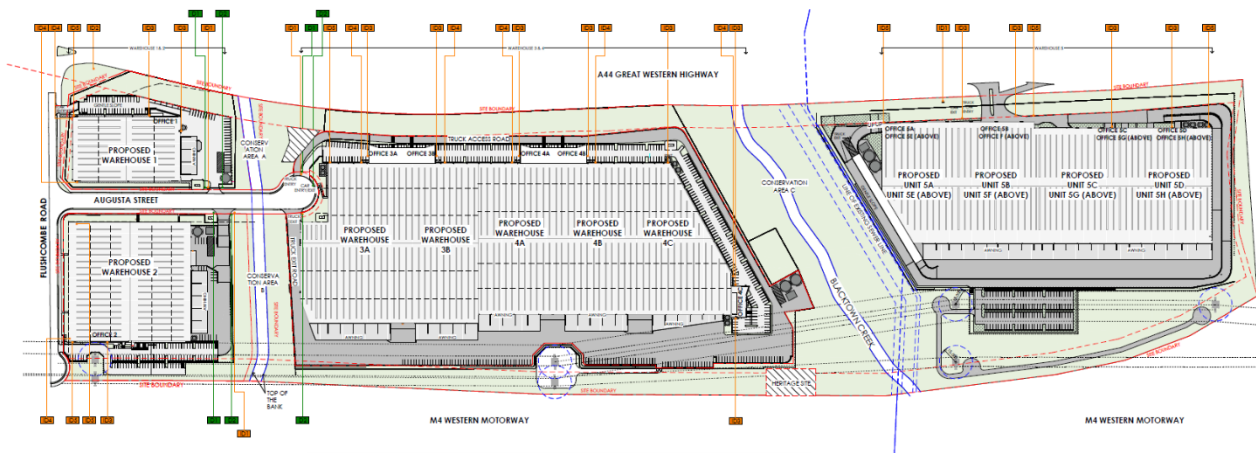
Source: PACE Architects

3.2.3.3. Signage

The proposed signage for the site has been detailed in the Architectural Plans at **Appendix G**.

20 business identification signs and 22 building identification and wayfinding signs are proposed including pylon wayfinding, free-standing, and integrated façade signs. The proposed signage has been appropriately located onsite with respect to each warehouse building and to assist with clear wayfinding for visitors to the site as shown in the journey plan below (refer to **Figure 8**).

Figure 8 – Signage Location Plan



Source: PACE Architects

The signs are illuminated and dimensioned as follows:

- Entry Sign Monolith (Illuminated) – 8,000mm by 2,000mm
- Entry Sign Free-Standing – 3,000mm by 4,000mm
- Building Identification (Illuminated) – 900mm by 1,600mm
- Tenant Signage – 2,600mm by 5,000mm
- LOGOS Signage (Illuminated) – 810mm by 4,100mm

Nominated signs will be illuminated 24 hours per day, 7 days per week, aligned with the proposed operating hours of the development.

3.2.4. Landscaping

Landscaping will be undertaken in accordance with the Landscape Plans prepared by Habit8 at **Appendix N**. The landscape strategy provides planting which responds to the existing and proposed site features of the development, including six defined zones as listed below:

- Entry Feature Planting
- Car Park and Office Planting
- Conservation
- Conservation (Setback)
- Conservation (Under Electrical Easement)
- Conservation Planting (Bioretention Basins)

Figure 9 – Landscape Plan



Source: Habit8

Other key features of the landscape strategy include:

- 9.4 hectares of the total site area are to be landscaped (35.3%), including 2,000 new tree plantings onsite comprised of native species.
- Large canopy tree planting as well as screening shrubs are proposed along the northern boundary to soften the visual impact of the proposed warehouse buildings and the 3-metre high acoustic walls which sit behind the landscaped setback.
- The car park designs include landscaped beds to provide for tree planting and shading via natural canopy coverage.
- Landscaping is also provided within the conservation areas and riparian corridors, including a boardwalk and viewing platforms.

3.2.5. Stormwater Management

Roof rainwater will be collected in designated rainwater tanks for use as non-potable water in toilets or landscape irrigation. Excess rainwater will be pass through the tanks at times when the rainwater storage tank is full through to be discharged via gravity into the stormwater drainage system. The proposed rainwater tanks are described as follows:

- Warehouse 1: 65kL Tank
- Warehouse 2: 65kL Tank
- Warehouse 3 & 4: 2 x 65kL Tank + 1 x 85kL Tank
- Warehouse 5: 2 x 65kL Tank

To maintain stormwater quality, the following treatment system will be implemented for the warehouses across the site:

- Primary treatment of external areas will be made via pit inserts or Gross Pollutant Traps (**GPTs**).
- Tertiary treatment of the development will be made via bioretention basins where there is available space as well as via one of two proprietary treatment systems where space is limited. The second mentioned treatment systems are proposed to be syphon actuated filtration systems housed in underground tanks.
- Discharge into watercourses as noted in previous sections of the report will occur following treatment.
- Some treatment will also be present by provision of rainwater reuse tanks on development sites through reuse and settlement within the tanks.

3.2.6. Transport and Parking

3.2.6.1. Access

Access to the western part of the site will be via Flushcombe Road or Augusta Street. Access to the eastern part of the site will be via the 'fourth leg' of a new intersection being delivered by TfNSW to improve access between the Great Western Highway and the Prospect Highway.

Access arrangements for each of the warehouse buildings is described below.

- Warehouse 1: Two-way truck entry from Augusta Street with car entry / exit to the car park area via a new crossover to Flushcombe Road. This layout will cater for up to 20m articulated vehicles.
- Warehouse 2: Two-way truck entry from Augusta Street with car entry / exit to the car park area via a new crossover to Flushcombe Road. This layout will cater for up to 20m articulated vehicles.
- Warehouse 3 & 4: From a turning circle at the end of Augusta Street:
 - Truck entry is from the first north exit running along the northern edge of Warehouse 3 & 4.
 - Car entry / exit is from the second north crossover and connects to the car park running along the north and eastern edge of Warehouse 3 & 4.
 - Truck egress is via the southern crossover to the turning circle, completing a truck access loop around the warehouse building.

Loading docks and roller-shutter doors are located under the southern edge of Warehouse 3 & 4. This layout will accommodate up to 26m B-Double trucks.

- Warehouse 5: Via the fourth leg of the new signalised t-intersection connecting the Great Western Highway to the Prospect Highway. Truck and vehicular access will be delineated at the site entry, vehicles required to move into the undercroft car parking and trucks directed up the ramp to the first and second storey of Warehouse 5. This layout will accommodate up to 26m B-Double trucks.

All construction vehicles will access the site via current site via the existing crossovers to Augusta Street for the eastern side of Blacktown Creek, and via the proposed (yet to be constructed) intersection of the Great Western Highway and the site for the western side.

3.2.6.2. Parking

951 car parking spaces will be provided onsite to support the proposed warehouses and ancillary office space. Car parking has been located across the site to respond to forecast parking demand for individual tenancies plus overflow spaces to accommodate Council's preferred car parking rates. The total car parking spaces provided to meet the needs of each of the warehouse buildings is described below:

- Warehouse 1: 73 spaces including two accessible spaces, three EV spaces and 25 overflow spaces.
- Warehouse 2: 106 spaces including three accessible spaces, three EV spaces and 17 overflow spaces.
- Warehouses 3 and 4: 346 spaces including 10 accessible spaces, 12 EV spaces and 113 overflow spaces.
- Warehouse 5: 426 spaces including 12 accessible spaces, 14 EV spaces and 120 overflow spaces.

Bicycle and motorcycle parking has been provided as follows:

- Warehouse 1: 2 motorcycle spaces and 10 bicycle spaces.
- Warehouse 2: 3 motorcycle spaces and 8 bicycle spaces.
- Warehouses 3 and 4: 7 motorcycle spaces and 42 bicycle spaces.
- Warehouse 5: 11 motorcycle spaces and 25 bicycle spaces.

End-of trip facilities are provided within each of the proposed warehouse tenancies, including secure bicycle parking within each office component, shower and toilet facilities for employees to change.

3.2.7. Utility Services

The proposed development requires the installation of 11kV feeder provide from the Arndell Park Zone substation to provide electricity demand for the warehouse buildings. The associated substations to direct feeder input are located accordingly:

- Warehouse 1: south-eastern corner of the warehouse adjacent to the truck entry.
- Warehouse 2: north-eastern corner of the warehouse adjacent to the truck entry.
- Warehouses 3 and 4: south-eastern corner of Warehouse 4 component adjacent Blacktown Creek.
- Warehouse 5: both remaining substations are at the north-western corner on the undercroft car parking level.

An existing 100mm water main within Augusta Street will be relocated and upsized to a 150mm/200mm water main to supply the proposed development. No augmentation of waste water or telecommunications services are required to service the proposed development.

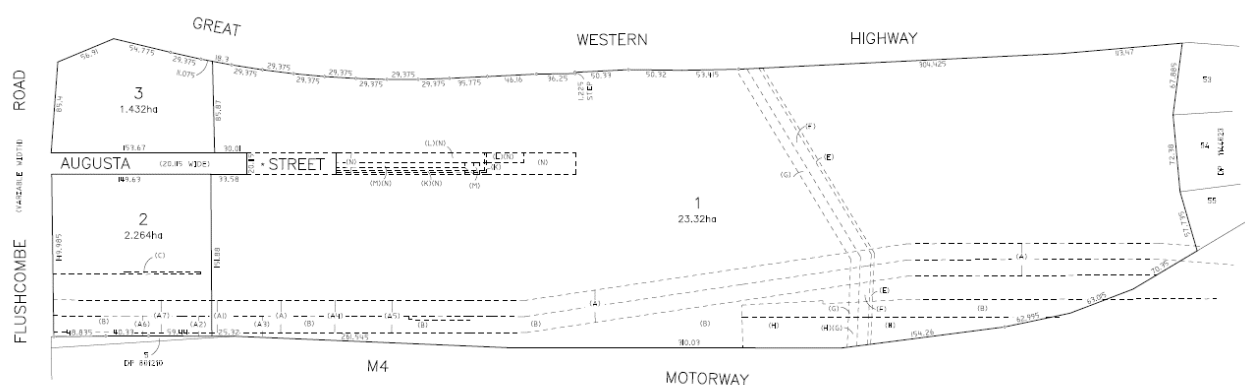
3.2.8. Site Consolidation and Subdivision

The 45 existing lots are to be consolidated and subdivided into three Torrens title allotments (refer to **Appendix GG, Table 7** and **Figure 10**). The existing site easements have been maintained to facilitate access and maintenance of services to the proposed consolidated lots.

Table 7 Proposed Lot Breakdown

Proposed Lot	Area	Development
Proposed Lot 1	23.32ha	Warehouses 3, 4, and 5
Proposed Lot 2	2.264ha	Warehouse 2
Proposed Lot 3	1.432ha	Warehouse 1

Figure 10 – Proposed Plan of Consolidation



Source: LandPartners

3.2.9. Uses and Activities

3.2.9.1. Proposed Uses

The proposal seeks approval for a 'warehouse and distribution centre' under the I&E SEPP. The office components are directly linked with the individual warehouse tenancies and deemed ancillary to the primary 'warehouse or distribution centre' use.

3.2.9.2. Activities

LOGOS has confirmed that there are no known tenants at this stage. The proposed development is in the early stages of marketing for the site. The facility has been designed to accommodate typical warehouse and distribution centre occupiers in accordance with the permitted use of the IN1 zoning under the I&E SEPP.

Multiple tenancies are provided to respond to market demand. The current configuration could be modified by either being consolidated or split into additional tenancies depending on future tenant requirements.

On-site activities associated with the warehouse and distribution use will include:

- Loading, unloading and handling of goods and materials for the purposes of storage and distribution (nb storage of dangerous goods is not proposed as part of this SSDA and would be subject to separate approval, if required).
- Heavy rigid vehicle movements and car parking, including arrival and departure of employees.
- Office operations to support the warehouse and distribution tenancies.
- Security and management of the wider site. Including landscaped areas and employee amenities.

3.2.9.3. Operations

The proposed development is to operate 24 hours per day, 7 days per week.

3.2.9.4. Waste Management

Warehouse waste will be stored in 600 litre general waste and recycling bins, located in the waste storage areas closest to the subject tenancy. Small residual waste and recycling receptable will be provided within the ancillary offices. Office waste will be collected by cleaning staff and disposed in the 660 litre bins located in the dedicated waste storage area for each warehouse.

Waste storage areas are located within the truck hardstand areas, enabling direct and convenient access for waste collection vehicles. Vehicles will enter the site from the designated truck access point, either from Augusta Street for Warehouses 1-4 or Great Western Highway for Warehouse 5.

3.2.10. Development Timing and Staging

The project will be carried out in a single construction stage, with individual phases captured via construction certificates (CCs) and occupation certificates (OCs). Details are as follows:

- Site preparation works including tree removal, earthworks, utility services installation, construction of retaining walls and stormwater management.
- Detailed excavation and foundations
- Construction of the undercroft car parking for Warehouse 5.
- Construction of each warehouse building within individual construction certificates.
- Landscaping, external works, fit out, and public domain.

It is anticipated that construction will commence in Q2 of 2024 and involve a 16-month construction and design programme.

4. Statutory Context

This section of the report provides an overview of the key statutory requirements relevant to the site and the project, 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 Regulations)*
- *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)*

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

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

Table 8 Identification of Statutory Requirements for the Project

Statutory Relevance	Action
<i>Power to grant approval</i>	The EP&A Act establishes the framework for the assessment and approval of development and activities in NSW. The EP&A Act also facilitates the making of environmental planning instruments which guide the way in which development should occur across the State. This is inclusive of State environmental planning policies and local environmental plans. Section 4.36 of the EP&A Act provides for a process where development can be declared SSD either by a SEPP or Ministerial order published in the Government Gazette. Section 4.37 of the EP&A Act provides that the Minister is the consent authority for SSD. Part 4, Division 4.7 of the EP&A Act sets out the provisions which apply to the assessment and determination of development applications for SSD. The proposal is subject to section 4.38 Consent for State Significant Development. In accordance with Clause 12 of Schedule 1 of the <i>State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP)</i>, development with a capital investment value (CIV) of greater than \$30 million that is for the purpose of a warehouse and distribution centre, at one location and related to the same operation, is classified as SSD: 12 Warehouse or distribution centres <i>(1) Development that has a capital investment value of more than the relevant amount for the purpose of warehouses or distribution</i>

Statutory Relevance	Action
	<i>centres (including container storage facilities) at one location and related to the same operation.</i> <i>(2) This section does not apply to development for the purposes of warehouses or distribution centres to which section 18 or 19 applies.</i> <i>(3) In this section—</i> <i>relevant amount means—</i> <i>(a) for development in relation to which the relevant environmental assessment requirements are notified under the Act on or before 31 May 2023—\$30 million, or</i> <i>(b) for any other development—\$50 million.</i> The proposed works have an estimated CIV of \$446,000,000.00 (excl. GST) (refer to Appendix A) and are for the purposes of a warehouse or distribution centre development. Accordingly, the proposal is SSD for the purposes of the Planning Systems SEPP.
<i>Permissibility</i>	The site is zoned IN1 General Industrial in accordance with Section 2.10 of <i>State Environmental Planning Policy (Industry and Employment) 2021</i>. The proposed development constitutes a ‘warehouse or distribution centre’ which is defined as follows: <i>warehouse or distribution centre</i> means a building or place used mainly or exclusively for storing or handling items (whether goods or materials) pending their sale, but from which no retail sales are made, but does not include local distribution premises. A warehouse and distribution centre is permitted with consent in the IN1 Zone and accordingly, can be accommodated on the site. The proposal also includes office space which is ancillary to the main warehouse operations. Planning Circular PS 21-008 (‘How to characterise development’) confirms an ancillary use is a use that is subordinate or subservient to the dominant purpose on the land. Accordingly, the office component is permitted as it is subservient to the primary warehouse and distribution centre use.
<i>Other Approvals</i>	<i>Biodiversity Conservation Act 2016</i> 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 has been provided at Appendix P.
	<i>Roads Act 1993</i> 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. The proposal includes connection to the fourth leg of a new intersection being constructed by TfNSW on the Great Western Highway to

Statutory Relevance	Action
	provide access to Warehouse 5. Approval will be sought from TfNSW for connection to the Great Western Highway under Section 138(e) of the Roads Act 1993.
	The following Acts were considered in the assessment of SSD-36138263, however, no further approval is required for SSD as per section 4.41 of the EP&A Act: ▪ <i>National Parks and Wildlife Act 1974</i> (section 90) ▪ <i>Water Management Act 2000</i> (sections 89, 90, and 91) ▪ <i>Fisheries Management Act 1994</i> (sections 201, 205, and 219) ▪ <i>Rural Fires Act</i> (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 following table outlines the pre-conditions to exercising the power to grant approval which are relevant to the project and the section where these matters are addressed within the EIS.

Table 9 Pre-Conditions

Statutory Reference	Pre-condition	Relevance	Section in EIS
<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>			
Section 4.6 – Contamination and remediation to be considered in determining development application	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 been confirmed remediation works can be undertaken without consent and accordingly, does not form part of this approval.	Section 6.2.8
<i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i>			
Clause 2.6 – Clearing that requires permit or approval	A person must not clear native vegetation in a non-rural area of the State that exceeds the biodiversity offsets scheme threshold	The site currently contains 2.83ha of areas classified as containing biodiversity value of which 0.52ha is proposed for removal.	Section 6.1.5 and Appendix P

Statutory Reference	Pre-condition	Relevance	Section in EIS
	without the authority conferred by an approval granted by the Native Vegetation Panel under Part 2.4.	This requires an offset for PCT 3319 Cumberland Shale Hills Woodland with eight ecosystem credits.	
<i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>			
Clause 2.48 – Determination of development applications-other development	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 has been consulted prior to the lodgement of the application and DPE will refer a copy of the SSDA for their comment as part of the assessment process	Section 6.2.13 and Appendix DD
Clause 2.119 – Development with frontage to classified road	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.	A Transport and Accessibility Impact Assessment (TAIA) has been prepared for the proposed development which demonstrates the proposed site access will not impact the Great Western Highway or M4 motorway having regard to their safety and efficiency.	Section 6.1.4 and Appendix M
Clause 2.122 – Traffic-generating development	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	The proposed warehouse and distribution has a GFA over 5,000m ² and connects to a classified road and accordingly, is considered traffic-generating development. TfNSW has been consulted prior to the lodgement of the application and DPE will	Section 6.1.4 and Appendix M

Statutory Reference	Pre-condition	Relevance	Section in EIS
	TfNSW within 21 days after the notice is given.	refer the SSDA for their comment as part of the assessment process.	
<i>State Environmental Planning Policy (Industry and Employment) 2021</i>			
Clause 2.19 – Ecologically sustainable development	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 proposed development incorporates principles of ESD and design initiatives to minimise the consumption of potable water and greenhouse gas emissions.	Section 6.2.2 and Appendix O
Clause 2.20 – Height of buildings	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.	Careful consideration has been given to the maximum building heights in the detailed architectural design response to minimise impact on the residential area to the north. The site topography and proposed earthworks have been addressed within the siting and design of the proposed buildings, including the multi-level building to the east and the single level development to the west.	Section 6.1.2, Appendix B, and Appendix H
Clause 2.21 – Rainwater harvesting	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	Each warehouse building onsite has been designed to harvest rainwater into warehouse specific rainwater tanks.	Section 6.2.5, Appendix B, and Appendix V

Statutory Reference	Pre-condition	Relevance	Section in EIS
	harvesting scheme (if any) as may be approved by the Secretary.		
Clause 2.22 – Development adjoining residential land	This section applies to any land to which this Chapter applies that is 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.	The proposed environmental impacts of the development, including the built form, amenity and operational impacts, have been assessed in detail having specific regard to the proximity of the residential area to the north.	Section 6.1.2, Section 6.1.3, Section 6.1.4, Section 6.1.6, Section 6.2.1, Appendix B, Appendix H, Appendix L, Appendix M, Appendix L, and Appendix R
Clause 2.24 – Public utility infrastructure	(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 will accommodate the forecast demands associated with the proposed warehouses and ancillary offices.	Section 6.2.13 and Appendix DD
Clause 2.28 – Industrial Release Area – satisfactory arrangements for the provision of regional transport infrastructure and services	(3) Despite any other provision of this Chapter, the consent authority must not consent to development on land to which this section applies unless the Secretary has	Detailed investigations have been undertaken to confirm the contributions that will be payable to facilitate the proposed development, including satisfactory arrangements for	Section 6.2.15

Statutory Reference	Pre-condition	Relevance	Section in EIS
	certified in writing to the consent authority that satisfactory arrangements have been made to contribute to the provision of regional transport infrastructure and services (including the Erskine Park Link Road Network) in relation to the land to which this Chapter applies.	regional transport infrastructure and services. Further consultation will be undertaken with DPE to confirm the relevance of the TICD which applies to the site and the final calculation of the SIC payable for the site.	
Clause 2.43 – Consent for clearing native vegetation	Development consent under this section is not to be granted unless the consent authority is satisfied of that the clearance of vegetation is reasonable, justified, and any loss compensated.	A BDAR has been provided which assesses the proposed clearing of 0.45ha of 'degraded' rated vegetation and 0.07ha of 'less degraded' vegetation. This loss of vegetation will be compensated via greater landscaping onsite (0.8ha) and the purchasing of Biodiversity Credits.	Section 6.1.5 and Appendix P
Clause 2.44 – Stormwater, water quality and water sensitive design	Before granting development consent to development on land to which this Chapter applies, the consent authority must take into consideration whether the development exhibits water sensitive design principles, riparian, stormwater and flooding measures, mitigate potential water quality impacts, and includes measures to restore riparian lands.	The proposed development has considered all potential impacts to riparian corridors, stormwater quality and flow, and any potential flooding. Blacktown Creek and the drawing swale will be realigned and rehabilitated, with mitigation measures to offset biodiversity impacts and manage stormwater quality and flooding.	Section 6.1.5, Section 6.2.5, Section 6.2.6, Appendix B, Appendix P, and Appendix V.
Clause 3.6 – Granting consent to signage	<i>A consent authority must not grant development consent to</i>	The proposed signage is appropriate and consistent with the	Appendix B

Statutory Reference	Pre-condition	Relevance	Section in EIS
	<i>an application to display signage unless the consent authority is satisfied—</i> <i>(a) that the signage is consistent with the objectives of this Chapter as set out in section 3.1(1)(a), and</i> <i>(b) that the signage the subject of the application satisfies the assessment criteria specified in Schedule 5.</i>	objectives and requirements of Section 3.6 and Schedule 5 of the I&E SEPP.	

4.3. Mandatory Considerations

The following table outlines the relevant mandatory considerations to exercising the power to grant approval and the section where these matters are addressed within the EIS.

Table 10 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 B
Section 4.15	<u>Relevant environmental planning instruments</u>	
	▪ <i>Planning Systems SEPP</i>	Appendix B
	▪ <i>R&H SEPP</i>	Section 6.2.8 and Appendix B
	▪ <i>T&I SEPP</i>	Appendix B
	▪ <i>B&C SEPP</i>	Appendix B
	▪ <i>I&E SEPP</i>	Appendix B
	<u>Relevant draft environmental planning instruments</u>	N/A
	None relevant to the proposed development.	
	<u>Relevant planning agreement or draft planning agreement</u>	N/A
	None relevant to the proposed development	
	<u>Development control plans</u>	Appendix B

Statutory Reference	Mandatory Consideration	Section in EIS
	<i>Huntingwood Precinct Development Control Plan 2011 (HDCP 2011)</i>	
	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 and Section 7
	The suitability of the site for the development	Section 7
	The public interest	Section 7
Mandatory relevant considerations under EPIs		
R&H SEPP	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.	Section 6.2.8 and Appendix B
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 Motorway, and Prospect Highway classified road. The proposed development has considered the proposed development against the ordinance of Clause 2.119 (2).	Section 6.1.4 and Appendix B
	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, greater than 5,000sqm, and accordingly the application is required to be referred to TfNSW.	Section 6.1.4 and Appendix M
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	Appendix B
	Chapter 3, Part 3.2, Clause 3.6 'Granting of consent to signage' requires applications to display signage must	Appendix B

Statutory Reference	Mandatory Consideration	Section in EIS
	be consistent with the objectives set out in Clause 3.1(1)(a) and assessment criteria under Schedule 5.	
Considerations under other legislation		
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 6.1.5 and Appendix P
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 B
Development Contributions Plan		
Voluntary Planning Agreement	A s7.11 Contribution Plan currently does not apply to the site. The applicant will enter into a Planning Agreement with Blacktown City Council to deliver road and stormwater upgrades and off-site landscaping (if considered appropriate).	Section 6.2.15 and Appendix B

5. Community Engagement

The following sections of the report describe the engagement activities that have been undertaken during the preparation of the EIS and the community engagement which will be carried out if the project is approved.

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:

- Government, agency and utility stakeholders as listed within the SEARs, including TfNSW regarding the connection of the site to the new Prospect Highway intersection and Blacktown City Council regarding the design principles and responding to community feedback.
- Registered Aboriginal Parties, including the Deerubbin Local Aboriginal Land Council and Darug Custodian Aboriginal Corporation.
- Surrounding landowners, Friends of St Bartholomew's, businesses and community members.

Consultation was undertaken with the following agency stakeholders to inform the detailed assessment of key matters:

- Blacktown City Council
- Department of Planning and Environment (**DPE**)
- Heritage NSW
- Fire and Rescue NSW
- Sydney Water
- Transport for NSW (TfNSW)
- Natural Resources Access Regulator (**NRAR**)
- Endeavour Energy

It was confirmed the NSW Rural Fire Service were not required to be consulted based on the limited area of land affected by the Bushfire Buffer Zone and its implications for the future development.

The following actions were taken to inform the community regarding the project and seek feedback regarding the proposal:

- Newsletter.
- Door knock.
- Community online information session.
- Website.
- Engagement email and phone number.
- Update letter to residents.

This engagement was consistent with the community participation objectives in the Undertaking Engagement Guidelines for State Significant Projects and complied with the community engagement requirements in the SEAR.

In accordance with the Regulations, the EIS will be placed on formal public exhibition once DPE has reviewed the EIS and deemed it 'adequate' for this purpose. Following this exhibition period, the applicant will respond to any matters raised by notified parties.

5.2. Community Views

The community online information session was attended by three residents and four enquiries were received via the dedicated phone number and email address.

The outcomes of the consultation and the relevant responses are detailed in the Consultation Outcomes Report prepared by Urbis as **Appendix FF** and the engagement summary at **Appendix D**. The key issues raised by the community and key stakeholders are summarised in the table below.

Table 11 Community Feedback

Key Issue	Respondent	Applicant Response
Strategic Context	Nil	Nil
Project and Alternatives	Nil	Nil
Relevant Statutory Issues		
SSDA Process	Information sought regarding SSDA process and whether this process is designed to bypass Council regulations.	The CIV of the proposed development as a warehouse and distribution centre meets the threshold for the SSD pathway. As part of this process Blacktown Council is consulted and feedback sought.
Community Engagement		
Public exhibition of documents	Clarification sought regarding how to access documents during the public exhibition of the application.	All documents lodged will be available via the Major Projects Portal. A link to the portal was provided by Urbis Engagement to the attendees of the information session.
Economic, Environmental and Social Impacts		
Noise	Concerns raised regarding potential noise associated with trucks driving up the ramp, forklift noise and the proposed hours of operation	The siting and design of the proposed development has been carefully considered to reduce potential acoustic impacts, including locating loading areas away from residential properties and providing acoustic mounding and acoustic walls along the northern part of the site. The SSDA is accompanied by an Acoustic Assessment was prepared by SLR (Appendix R) which includes a detailed assessment of the potential noise impacts.
Operation hours, truck movements and car parking	Concerns regarding operation hours, number of expected truck movements and excessive car parking	The proposal seeks consent for use of the proposed warehouses 24 hours per day, seven days per week. The assessment reports

Key Issue	Respondent	Applicant Response
		lodged with the SSDA have been prepared on this basis. A detailed assessment has been undertaken of proposed vehicle movements and associated impacts on the local road network. A new entry will be provided from the Great Western Highway, as well as infrastructure upgrades to Great Western Highway and Flushcombe Road to accommodate the proposal. The proposed car parking complies with TfNSW and Council DCP rates. It is expected the forecast demand for car parking will be less than the parking required under Council's DCP. Overflow parking areas are provided to accommodate any changes in tenant demands and avoid parking on local streets.
Flushcombe Road traffic flow	Traffic flow along Flushcombe Road, particularly due to the highly active commercial area.	A detailed assessment has been undertaken of proposed vehicle movements and associated impacts on the local road network. A new entry will be provided from the Great Western Highway, as well as infrastructure upgrades to Great Western Highway and Flushcombe Road to accommodate the proposal.
Intersection lights	Why additional pedestrian lights are included due to the impact on traffic	A range of measures are to be implemented to accommodate travel demand, including parking for private vehicles, plus bicycle parking and end of trip facilities to accommodate active transport as a means of travel. All movements have been considered in detail within the traffic impact assessment.
Dust management	Dust management during excavation	A Construction Air Quality Management Plan (CAQMP) and Construction Management Plan

Key Issue	Respondent	Applicant Response
		will be prepared to ensure appropriate management of dust during construction and includes covering or re-vegetate earthworks/exposed soil and use of water to suppress.
Trees	The planting of mature trees to reduce noise impacts	Substantial planting of trees is proposed along the setbacks and conservation zones to visually screen the development and provide biodiversity benefits, however, it is noted trees are not deemed beneficial for mitigating acoustic impacts. A landscaped acoustic mound and acoustic walls will provide for noise mitigation and avoid unacceptable impacts.
Drainage and water run off	Drainage and water retention and concern that runoff from the site will cause local flooding	Detailed consideration has been given to stormwater and flood management to avoid any impacts to upstream or downstream properties. This includes provision of on-site stormwater detention basins, water quality management measures and rainwater capture and re-use.
Justification and Evaluation of Project as a Whole	Nil	Nil
Issues Beyond Scope or Not Relevant to Project	Nil	Nil

5.3. Engagement to be Carried out

The applicant will continue to keep stakeholders and the community informed of the project approval process through the exhibition and determination phases by:

- Continuing to engage with the community about the project, its impacts, and the approval process
- Providing information on how the community's views have been addressed on the project website and through a letterbox drop
- Enabling the community to seek clarification about the project through the two-way communication channels.

6. Assessment of Impacts

This section describes the way in which the key issues identified in the SEARs have been assessed. It provides a comprehensive description of the specialist technical studies undertaken regarding the potential impacts of the proposed development and recommended mitigation, minimisation and management measures to avoid unacceptable impacts. 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 B**).
- Community engagement table identifying where the issues raised by the community during engagement have been addressed (**Appendix C**).
- Proposed mitigation measures for the project which are additional to the measures built into the physical layout and design of the project (**Appendix D**).

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

6.1. Detailed Assessment Impacts

6.1.1. Design Quality

An Architectural Design Report has been prepared by PACE Architects and is provided at **Appendix H**. The Design Report sets out the site analysis, design principles and design outcomes. It also demonstrates how the proposal responds to the design principles in the I&E SEPP and the seven objectives for good design in the NSW Government Architect's 'Better Placed' guidelines as outlined below.

6.1.1.1. Design Principles

The proposed development has been assessed in accordance with the design principles listed in section 2.30 of the I&E SEPP and as outlined in the table below.

Table 12 Compliance with SEPP Design Principles

Design Principle	Proposed Development
<i>(a) the development is of a high quality design, and</i>	A high-quality industrial design is achieved with the juxtaposition of materials, building articulation and creating a mix of grounded and elevated forms in consultation with the City Architect. The proposal incorporates premium materials and finishes, appropriate for the Australian climate.
<i>(b) a variety of materials and external finishes for the external facades are incorporated, and</i>	Consideration has been given to the scale of the buildings to create visual interest in the façade through rhythm and articulation, using different layers of materials and patterns resulting in varied but repeated built form.
<i>(c) high quality landscaping is provided, and</i>	High quality landscaping is provided which will enhance the existing natural environment through new canopy tree planting.
<i>(d) the scale and character of the development is compatible with other employment-generating development in the precinct concerned.</i>	The scale and character of the proposed development is consistent with its location in an

Design Principle	Proposed Development
	established industrial and employment precinct and recent large-scale building approvals.

Based on the above, it is considered the development satisfactorily responds to the design principles for the WSEA and will deliver a high quality design which is appropriate for the site.

6.1.1.2. Better Placed

The proposed development is consistent with the Better Placed objectives as demonstrated below:

- *Objective 1 – Better fit*

The design of the proposed development is based on an understanding of the site's setting and the environment. The proposal is well located to capitalise on its local context, including key transport infrastructure.

- *Objective 2 – Better performance*

The proposal addresses the principles of ecologically sustainable development (**ESD**) and will preserve, maintain and improve natural environmental outcomes. The use of a functional roof to incorporate potential future solar PV panels and various mechanical louvres to allow passive cooling systems which will improve running costs of the development. Building form has been designed to take advantage of its northern orientation. The awnings around the office buildings will provide shading and reduce direct sunlight to the internal floorspace. This will also reduce air conditioning requirements.

- *Objectives 3 & 4 – Better for community / Better for people*

The proposed development will provide for business development, economic growth, and job creation within the Blacktown LGA which is consistent with local strategic policy. The proposed development will create a pleasing and welcoming environment for visitors and workers incorporating high quality finishes of the buildings, landscaped boundaries and conservation corridors.

The design will provide accessible pathways and parking amenities. Ancillary office space has been incorporated into each building to provide suitable amenities for workers associated with the warehouse spaces.

- *Objective 5 – Better working*

The development will support a competitive and efficient freight and logistics network and a development which benefits from excellent regional connections. Amenity space has been located to provide easy access for workers in the offices and warehouses including outdoor staff lunch spaces along the riparian corridor.

- *Objectives 6 & 7 – Better value / Better look and feel*

The proposal will provide additional high quality industrial floor space in an appropriately located warehouse and logistics park. The proposed development includes high quality architectural treatment, which will contribute towards a cohesive and attractive estate. Adopting high quality prefinished materials results in more user friendly, better performance and lower maintenance requirements. The office components provide visual interest and provide focal points to each warehouse and across the estate.

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

6.1.2. Built Form and Urban Design

6.1.2.1. Layout and Design

The design of the proposed built form is described in **Section 3** of this report and the accompanying Architectural Design Report (**Appendix H**). Architectural drawings are also enclosed in **Appendix G**.

The Architectural Design Report details how the proposed development addresses and responds to the site's context and site characteristics as well as the existing and future character of the locality.

Responsive to the context

The proposal responds positively to the site constraints, including the riparian corridor and the watercourse that divide the site, integrating the site landscaping and stormwater management measures and optimising the visual break between the proposed buildings to reduce the potential bulk and scale. The proposal also utilises the transmission easement along the southern boundary by providing for overflow car parking to respond to Council's DCP parking rates. The siting and design of the development also responds to the major highways along the long northern and southern boundaries restricting vehicle access and the noise sensitive development (residential) on the northern side of the Great Western Highway.

The development responds to the site and the urban context of the area by orienting building uses, heights, alignments and massing to reduce impact to northern boundary and residential properties on the opposite side of the Great Western Highway. This includes the inclusion of offices spaces on the northern elevation to articulate the building mass and maximise natural daylight to these spaces. Loading facilities are generally located to the south to mitigate the associated acoustic noise to the residential area to the north.

Figure 11 - Site Analysis (with key constraints and opportunities)



Source: PACE Architects

The varying site topography of the residential area to the north screens most of the development from the sensitive receptors. The development also incorporates 20m landscape setbacks which over the life of the development continue to screen greater portions of the proposed development. A 3m high acoustic wall sits behind the northern landscape setback, screened by the proposed planting within the Conservation (Setback) zones.

Layout

The built form is appropriately setback from the motorways, Augusta Street and Flushcombe Road to generally comply with the provisions of the HDCP 2011 and enable landscaping in the setbacks to soften the site boundaries and contribute to providing relief to the warehouse elevations. Minor variations to the DCP setback provide for the delivery of overflow car parking within the southern setback, however, this hardstand area is well setback from the road reserve and screened by dense planting. It also provides a much greater setback and landscaping compared to the developments to the west, which comprise hardstand area close to the property boundary.

The proposed building layout optimises the visual breaks provided by the conservation zones, with significant landscaping provided to soften the visual bulk of the warehouse buildings, complementing the

landscaped treatments within the large setbacks to the motorways. Loading areas are generally located to the south, enabling visual and acoustic screening from the residential properties to the north.

The proposed development layout is designed to integrate with the surrounding local road infrastructure, providing an operational traffic circulation system within the facility. Separation of access to the eastern and western parts of the site to avoid bridging over the Blacktown Creek riparian corridor.

Appropriate bulk and scale

The bulk, scale and height of the building components are consistent and compatible with modern logistics needs, while responding to the sensitive viewpoints from the north and east. The warehouses are sited to achieve maximum site efficiency, the office components are proportionally scaled and where possible, located and oriented to take advantage of natural daylight and articulate the northern elevations.

The proposed building is in keeping with the industrial nature of the context of the area. The scale, bulk and heights of the proposed buildings are consistent with the established building typology character and with the general surrounding industrial buildings. This includes the large-scale industrial building which was recently developed on the western side of Flushcombe Road. All building facades have been considered to generally present well to all streetscapes.

Consideration has been given to the scale of the buildings to create visual interest in the façade through rhythm and articulation, using different layers of materials and patterns resulting in varied but repeating forms. Design intent is achieved with the juxtaposition of forms, offsetting offices, and creating a mix of grounded and elevated forms. To assist in reducing the buildings prominence additional architectural features have been added to the facade cladding which aides its articulation.

Incorporation of the watercourses and conservation areas

Integration of riparian and conservation areas into the masterplan design have been achieved, re-purposing these spaces as valuable resources for the site's future occupants, while localising conservation work through regeneration and improvement in the quality and quantity of conservation land.

Materiality

Detailed consideration has been given to the treatment, material and colour of the warehouse elevations, to enhance the streetscape and deliver a landmark key development in this highly accessible location. Materials and finishes proposed are of a high quality.

Materials have been provided to facilitate facade articulation including a combination of metal sheeting with various profiles, depths and colours, which will be integrated throughout the development. Typical of industrial buildings of this nature, the building materials consist predominately of light weight metal sheet cladding and concrete pre-cast panels as shown in the figure on the following page.

Specific architectural details are included to consider the LOGOS Design requirements which have been developed to deliver well considered approaches to a building's identity and a current market appreciation.

The design has employed the following key design measures and mitigating measures as follows:

- Minimising amount of cut and fill operation.
- Delivery of a fourth leg to the Great Western Highway to minimise disturbance to Blacktown Creek.
- Providing acoustic treatment to minimising noise impact on residential dwellings to the north.
- Providing loading areas on the south to reduce visual and noise impacts on northern residential area.
- Providing fire vehicle access roads to all proposed buildings.
- Arranging office locations on the northern side to optimise natural daylight and provide articulation and interest along on the building elevations.
- Business identification signage to identify future tenants and efficient wayfinding for visitors.

Figure 12 - Material Palette



Source: PACE Architects

6.1.2.2. Building Code of Australia (BCA)

A BCA Compliance Report has been prepared by McKenzie Group and is provided at **Appendix I**. The report confirms that the proposed 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 Fire Safety Strategy (**FSS**) has been prepared by Affinity Fire Engineering and is provided at **Appendix K**. The FSS outlines the fire engineering principles that will be utilised to ensure the prescriptive non-compliances with the Deemed-to-Satisfy (**DTS**) provisions of the BCA are resolved through a fire engineered Performance Solution to comply with the relevant building regulations.

6.1.2.3. Accessibility

An Accessibility Report has been prepared by Design Confidence and is provided at **Appendix J**. The report confirms that the proposed design can comply with relevant accessibility provisions of the BCA, either by meeting the DTS requirements or via a performance-based approach.

6.1.3. Visual Impact

Habitat8 was engaged to prepare a Landscape and Visual Impact Analysis (LVIA) provided at **Appendix L**, which assesses the potential visual impacts of the four proposed warehouse buildings. The LVIA has been undertaken responding to the SEARs which directs a visual analysis of the development from key vantage points.

12 key vantage points were selected which represent the major sightlines to the future buildings from the surrounding context. The locations were selected to be close to nearby sensitive residential receptors and significant vantage points within the surrounding public domain. Photographs were taken by Habitat8 at two metres above the existing ground level to represent potential sightlines of the development.

6.1.3.1. Existing Environment

The existing character is predominantly industrial in nature and located between two major roadways. The southern boundary of the site includes the 30m wide easement for transmission lines and Blacktown Creek which runs north-south on the central part of the site.

The site is generally of a gently undulating landform, with lower-lying areas in the centre of the sites and high points to the east and west. The existing site is overgrown with weeds evident of minimal ongoing maintenance.

Residential development is located to the north of the Great Western Highway and within the immediate visual catchment of the site. The landform changes from east to west, with varying levels of sensitivity for the receptors depending on whether dwellings sit lower than the road level (in the west) or higher (to the east).

Passing pedestrians and motorists will interact with the site along both the north and southern frontages, with these visual receptors considered of medium sensitivity.

6.1.3.2. Potential Impacts

Consideration was given to the potential impacts arising from the development immediately after construction and again within 15 years after the proposed landscaping has matured, providing increased landscaped screening of the proposed buildings. The analysis assessed the baseline/ Year 0, Year 5 and Year 15 time periods.

Each of the viewpoints and associated visual impacts are discussed in further detail in the LVIA. Extracts from the report showing some of the key viewpoints at baseline and Year 15 are provided on the following pages.

The LVIA assessed the value of the site based on the character and context in which it is currently located. The assessment concludes that the significance of the impact upon the landscape of the proposed development on average to be moderate/minor. This is in part due to the site existing vegetation, proposed large setbacks to be vegetated with large canopy trees, the undulating site topography in relation to its context, adjoining busy and large road infrastructure, surrounding industrial development and power line easement.

Motorists traveling in a north-south direction along M4 Motorway would experience marginal views of the warehouse facility due to the landscaped setbacks, power staunches and lines as well as the proposed dense tree and shrub planting to offset the visual impact. This vegetation will be most effective after 15 years for those receptors who experience direct views.

The overall visual impact assessment of the 12 viewpoints concluded that one viewpoint was rated as being of major visual impact (Viewpoint 11) and two of moderate visual impact (Viewpoint 3a to the northeast and Viewpoint 7 to the north), with the remaining being minor or negligible. Extracts of Viewpoint 3a (51 Hampton Crescent, looking south), Viewpoint 7 (37 Desley Crescent, looking south west) and Viewpoint 11 (St Bartholomew's Church and Cemetery, looking west) are provided below, including baseline photographs (existing views) and Year 0 (worst case scenario, prior to reaching landscape maturity).

Figure 13 - Viewpoint Locations



Source: Habitat8

Figure 14 – Viewpoint 3a – Baseline and Year 0 (51 Hampton Crescent, looking south)



Source: Habitat8



Source: Habitat8

Figure 15 – Viewpoint 7 - Baseline and Year 0 (37 Desley Crescent, looking south west)



Source: Habitat8



Source: Habitat8

Figure 16 – Viewpoint 11 - Baseline and Year 0 (St Bartholomew's Church and Cemetery, looking west)



Source: Habitat8

The LVIA determined that:

- Viewpoint 3a is to the northeast of the site, within the residential area and is rated as 'moderate' impact. The assessment deems the impact as appropriate as:
 - The upper levels of the two storey residences in this viewpoint are generally bedrooms/bathrooms and not living areas which experience views between roof structures, existing trees and through the Great Western Highway of the new development.
 - Views from adjacent residential properties to the northeast of the site shall have views to the proposed development but are proposed to be mitigated with tall native canopy trees, screening shrubs and groundcovers are planted. Following maturity, these planted buffers will provide a dense screen to help to soften and screen the development.
 - There is surrounding fringe vegetation in the current road reserves and setbacks that provide a further buffer to the site that in addition to the proposed site setback landscaping providing contextual screening to the proposed development.
- In relation to Viewpoint 7 (looking south west towards the proposed development), the visual impact of the proposed development is considered 'moderate' as views from ground level will be screened by fences, the lower topography and a multitude of foreground visual detractors. The upper floors of the residential houses are mostly bedrooms and bathrooms and generally are not living areas.

Parts of the horizon will be obscured, however, the current view line includes roads, houses, power lines as visual detractors while positive elements include distant vegetation. Overall, it is considered the site landscaping will assist with ameliorating impacts from the proposal.
- Viewpoint 11 is taken from the east within the grounds of St Bartholomew's Church and Cemetery and is rated as a 'major' visual impact, however, this is partly off-set by the existing intrusions, including the electricity transmission towers and other utility services infrastructure, and the surrounding road network which detracts from the visual context.

The photomontages for 5 Years and 15 Years demonstrate the proposed landscaping will soften the visual appearance of the development as the trees and lower storey planting mature over time, assisting with visual screening of the facade.

The Heritage Impact Statement has deemed the warehouse development is appropriate based on the changes to the surrounds from the late twentieth century with key viewlines now from the east. To the west, between Blacktown Creek and the Church, was identified as forming an important component of the heritage curtilage. The impacts of the Prospect Highway construction were recognised back in 2004 masterplan (submitted to Blacktown Council) with recommendations to plant screening vegetation on the western boundary of the Church property.

6.1.3.3. Mitigation Measures

The LVIA confirms some visual receptors predominantly to the north (residential areas) and east (St Bartholomew's Church & Cemetery) will be impacted by the proposal and accordingly, mitigation measures have been incorporated in the planning and design of the proposed development. The mitigation measures include:

- Preservation of existing trees and vegetation surrounding the site to shield the development through a filtered perspective. This involves safeguarding a substantial number of native trees along the western and northern boundaries, as well as within conservation zones.
- Appropriate scale and design of the buildings to create visual interest in the facade through rhythm and articulation, using different layers of materials and patterns resulting in varied built form.
- Incorporation of high quality landscaping which helps to achieve conservation of the existing natural environment through enhancing endemic canopy tree planting, while also providing greening to the street scene and built-form.
- Introduction of a three metre high acoustic mounding which will be landscaped to present an attractive appearance to the north. This mound also has reduced the number of required acoustic walls and where required, these are primarily located behind the landscaped setbacks.

6.1.4. Traffic, Transport and Accessibility

A Transport and Accessibility Impact Assessment (TAIA), including draft Construction Traffic Management Plan (CTMP) and principles for a Green Travel Plan (GTP) to be prepared post consent, has been prepared by Colston Budd Rogers & Kafes Pty Ltd (CBRK) and is provided at **Appendix M**. The TAIA assesses the anticipated transport implications of the project during construction and operational phases.

6.1.4.1. Existing Environment

Current access to the site is accommodated along Augusta Street, which is interconnected to the Great Western Highway and surrounding Blacktown and Western Sydney area. The site adjoins the following state roads; Great Western Highway to the north, Prospect Highway to the east, and the M4 Motorway to the south. These networks interconnect the site to Western Sydney as well as the primary motorway networks across Greater Sydney.

Public and active transport to the site is as follows:

- **Bus Services:** Local and regional bus services operate throughout the area along Flushcombe Road north of the site, Reservoir Road, and Prospect Highway. The closest bus stop to the site is located on Flushcombe Road, approximately 700m north of the site. The 722 services the stop, providing a loop service between Blacktown Station and Prospect operating at 15min frequencies during weekday morning and afternoon peak periods. This service will enable transfer to rail services from Blacktown Station.
- **Train Services:** Blacktown station is approximately 3.5km from the site and is serviced by the T1 North Shore, Northern and Western Line; T5 Leppington to Richmond Long; and intercity services between Bathurst and central.
- **Active Transport:** The site currently provides limited pedestrian connectivity and accessibility. A pedestrian crossing facility is provided across the Great Western Highway, on the western portion of the Flushcombe Road intersection. A bicycle network runs east-west along the M4 Motorway and north-south along the Prospect Highway.

Figure 17 – Proposed Prospect Highway Upgrade (pending site connection)



Source: TfNSW

6.1.4.2. Potential Impacts

Site Access Arrangements

Vehicular access to the proposed development will be provided via Augusta Street for Warehouses 1 to 4 and via the fourth leg of a new intersection on the Great Western Highway for Warehouse 5. Warehouse 1 and 2 will also have direct access from Flushcombe Road for their car parking facilities. These arrangements are consistent with the those identified in HDCP 2011 which identifies a new access point to/from the Great Western Highway.

Access to the Great Western Highway has been negotiated with TfNSW during the development of the proposal, with an 'in principle agreement for the new fourth leg of the intersection, providing direct access to the site with both left and right in/out movements, as well as the Prospect Highway connection.

All vehicular access to the site will be provided in-line with the relevant Australian Standards, with truck and car access being clearly delineated to minimise conflict between different vehicle classes and pedestrians. Sightlines for vehicles exiting and entering the warehouse areas will be maintained and designated driveways will be designed for the relevant largest access vehicle (truck entries – accommodate up to 26m B-doubles for warehouses 3, 4, and 5).

Car Parking

Car parking dimensions and aisle widths will be provided in accordance with the relevant Australian Standard, dimensioned 2.4m wide by 5.4m long with aisle widths of 6.1m. For accessible spaces, provision has been made for a 2.4m wide shared zone for wheelchair access.

Service and Emergency Vehicles Access

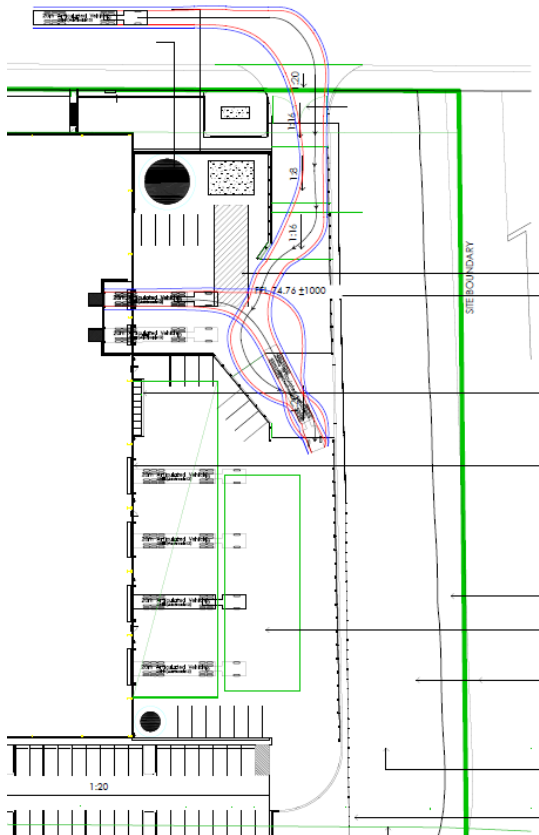
Loading docks for all warehouses will be accommodated within the building footprints and covered hardstand areas. All warehouses and loading docks will be designed in accordance with the Australian Standards for Parking Facilities (Part 2: Off-Street Commercial Vehicle Facilities), AS2890.2-2018. Each warehouse will be designed to enable vehicles to enter and exit the site in a forward direction.

Warehouses 1 and 2 will cater for large rigid trucks and articulated vehicles up to 20 metres in length. Access for these vehicles will be via two separate entry/exit driveways located on the northern and southern sides of Augusta Street.

The site plan illustrates the proposed development layout. Key features include:

- Office 1:** Located at the top left, with a plan view inset showing internal layout.
- Recessed Docks:** One dock is shown with dimensions 1500 x 2400.
- RSD (Recessed Docking Station):** Two units are shown, each with dimensions 6.0M(W) x 5.5M(H).
- 15m Awning:** A large awning structure is shown below the RSD units.
- Parking:** A parking area is shown at the top right, with a plan view inset showing internal layout.
- PK-CP4:** A parking space is labeled with this code.
- Landscaping:** Various landscaping elements are shown, including trees and shrubs.
- Access:** Arrows indicate access points to the site from the surrounding area.

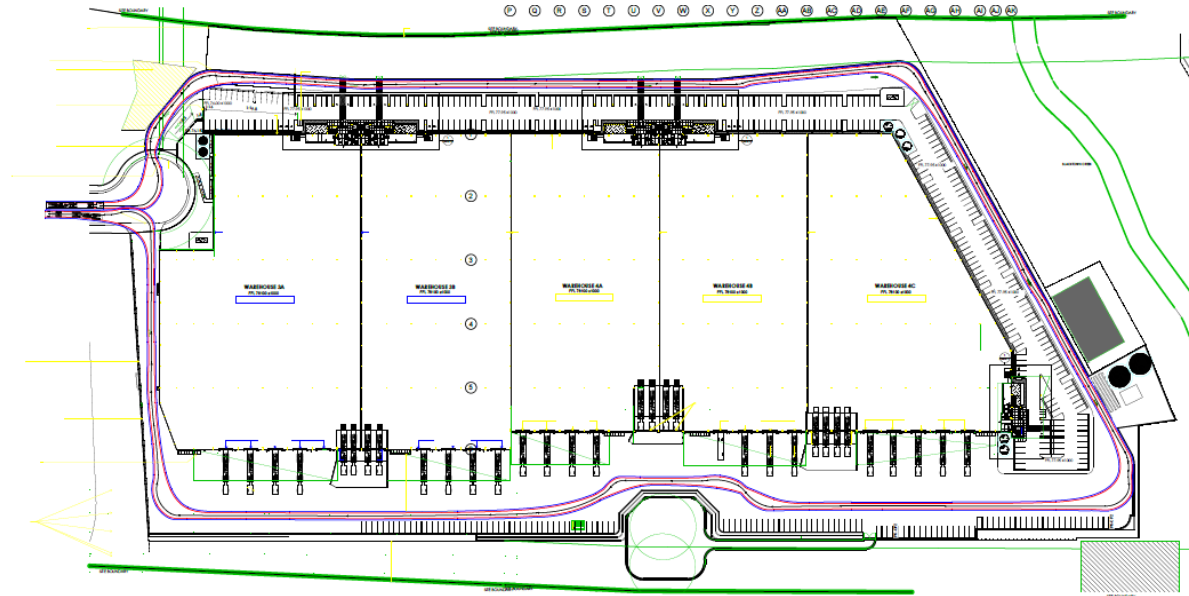
Figure 19 – Access Swept Paths – 20m Articulated Vehicle (Warehouses 2)



Access for service vehicles to Warehouses 3 and 4 will be via separate entry and exit driveways located at the eastern ends of Augusta Street. The internal circulation road will be designed to accommodate up to 26m

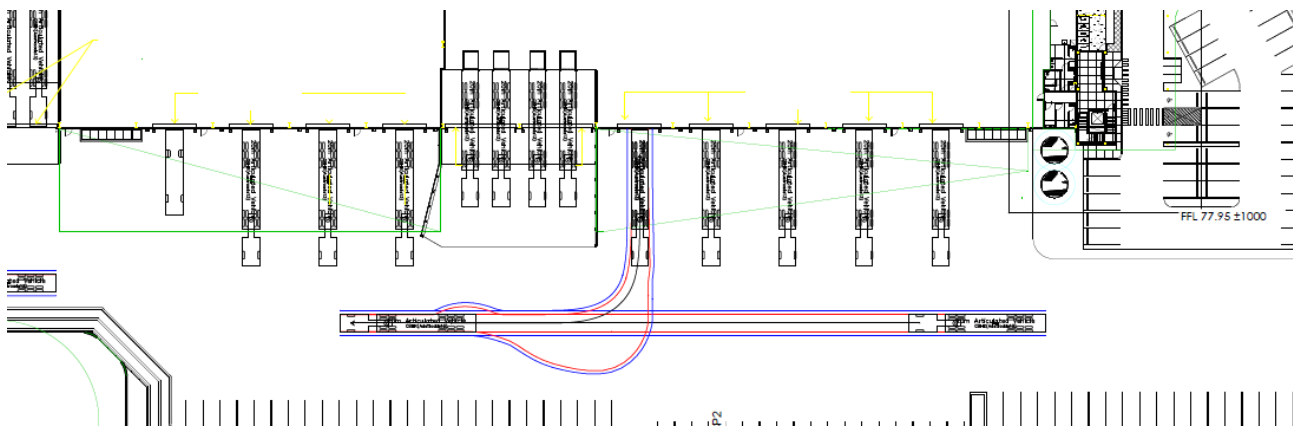
B-Double trucks. The circulation road moves around the perimeter of the building to the loading docks along the southern façade (Refer to **Figure 20** and **Figure 21**).

Figure 20 – Access Swept Path -26m B-Double (Warehouses 3 & 4)



Source: CBRK

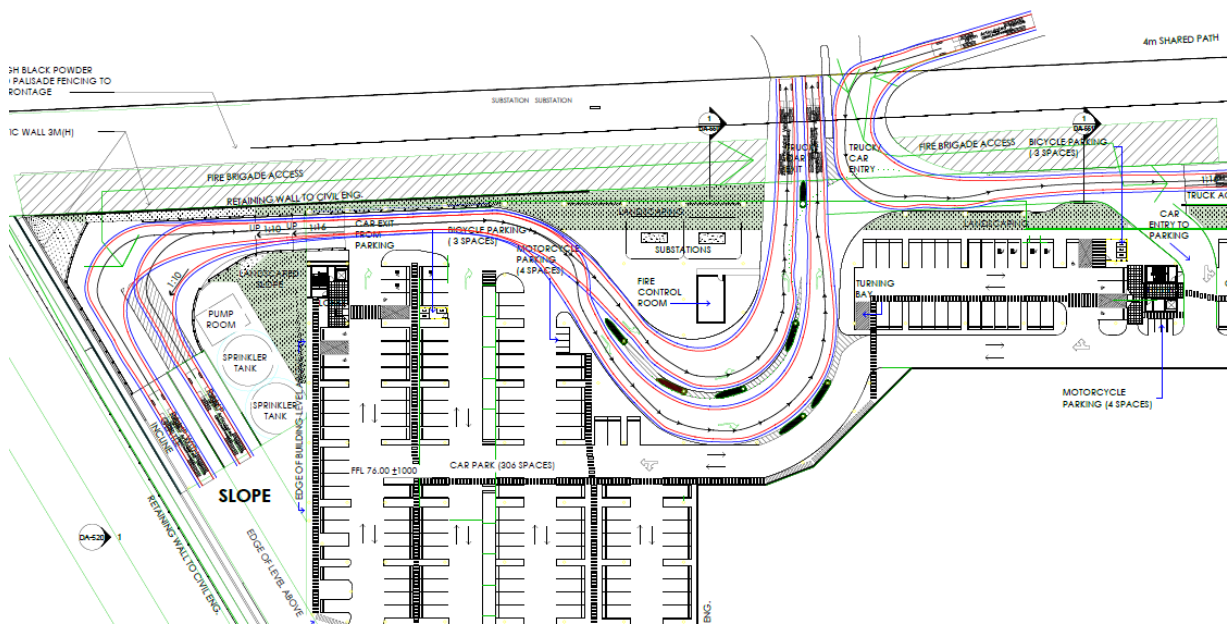
Figure 21 – Loading Bay Swept Paths – 20m Articulated Vehicle (Warehouses 3 & 4)



Source: CBRK

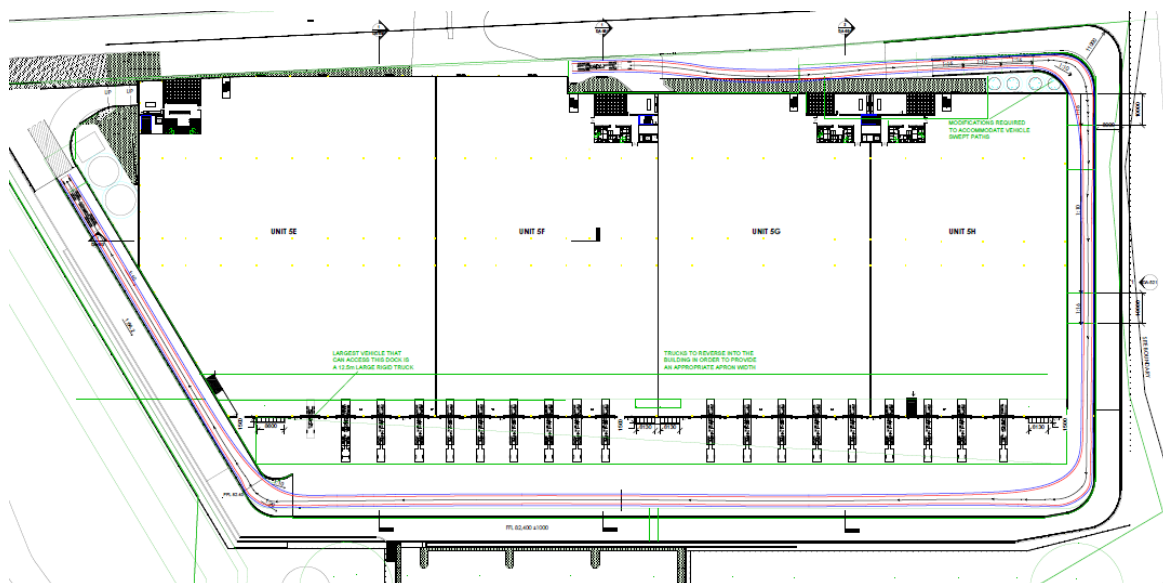
Access to Warehouse 5 will be via a fourth leg of an under-construction intersection connecting the Prospect Highway to the Great Western Highway adjacent to the site. This will operate as a signalised T-intersection onto the Great Western Highway. Access driveways and internal circulation roads will be designed to cater for service vehicles up to 26m B-Doubles with the ramp on the northern façade providing access to each level of the warehouse (Refer to **Figure 22** and **Figure 23**).

Figure 22 – Access Swept Paths – 26m B-Double – Great Western Highway (Warehouse 5)



Source: CBRK

Figure 23 – Access Swept Paths – 26m B-Double – Level 2 (Warehouse 5)



Source: CBRK

For emergency vehicle access, each warehouse can accommodate a 12.5m fire appliance vehicle with a designated space for parking adjacent to pump rooms on each hardstand.

Pedestrian Manoeuvrability

Pedestrian crossings have been provided throughout the car parking areas to ensure accessibility and pedestrian safety throughout the industrial precinct.

Parking

The proposed development complies with the parking requirements outlines under the TfNSW guidelines and HDCP 2011 as summarised in the following table.

Table 13 Summary of Parking Compliance with HDCP 2011

Type of Parking	Required Rate (min)	Proposed	Compliance
Car Parking	Office – one space per 40m² GFA Warehouse – one space per 100m² GFA for the first 7,500m²; then one space per 200m² GFA thereafter.	Based on the DCP rates, the following car parking is required for each tenancy: - Warehouse 1 (474m² office and 5,461m² warehouse) – 67 spaces - Warehouse 2 (363m² office and 11,668m² warehouse) – 106 spaces - Warehouse 3 & 4 (2,455m² office and 49,455m² warehouse) – 345 spaces - Warehouse 5 (3,290m² office and 61,443m² warehouse) – 426 spaces - Total required: 944 car parking spaces The above car parking significantly exceeds the RMS rates (equating to 590 spaces) and forecast demand for the proposal. However, Council may raise concerns unless DCP rates are achieved or 'overflow' car parking areas are provided so future tenants who require additional car parking can be accommodated. Accordingly, the following parking is proposed: - Warehouse 1 - 73 spaces including two accessible spaces, three EV spaces and 25 overflow spaces. - Warehouse 2 - 106 spaces including three accessible spaces, three EV spaces and 17 overflow spaces. - Warehouses 3 and 4 - 346 spaces including 10 accessible spaces, 12 EV	Yes

Type of Parking	Required Rate (min)	Proposed	Compliance
		spaces and 113 overflow spaces. - Warehouse 5 - 426 spaces including 12 accessible spaces, 14 EV spaces and 120 overflow spaces. - Total car parking – 951 spaces Overflow parking spaces are located along the southern boundary below the electrical transmission lines and distributed across the eastern, central and western parts of the site to optimise their future use by individual tenancies, as required.	
Accessibility Parking	Parking areas with more than 50 spaces, 2% of the spaces must be accessible.	22 accessible parking spaces are required. 27 accessible car parking spaces are provided as outlined above. Accessible car parking spaces have been located adjacent the office entries for each of the warehouse buildings, with accessible spaces provided for Warehouse 5 in the undercroft carparking area adjacent to the two elevator cores.	Yes
Motorcycle Parking	HDGP 2011 has no minimum motorcycle requirement.	No specific requirement for motorcycle car parking is nominated under HDGP. One space per 50 car spaces has been recommended which equates to the following for each tenancy: - Warehouse 1 (73 car spaces) - 2 spaces - Warehouse 2 (104 car spaces) - 3 spaces - Warehouse 3 and 4 (338 car spaces) - 7 spaces - Warehouse 5 (556 car spaces) - 10 spaces	Yes

Type of Parking	Required Rate (min)	Proposed	Compliance
		- Total motorcycle parking – 22 spaces Motorcycle parking has been provided as follows: - Warehouse 1 - 2 spaces - Warehouse 2 - 3 spaces - Warehouse 3 and 4 - 7 spaces - Warehouse 5 - 11 spaces - Total motorcycle parking – 23 spaces	
Bicycle Parking	HDCP 2011 suggests bicycle parking in accordance with Austroads Guidelines.	Based on the nominated Austroad Guidelines rates, bicycle parking is to be provided within warehouse tenancies as follows: - Warehouse 1 - 10 spaces - Warehouse 2 - 8 spaces - Warehouse 3 & 4 - 42 spaces - Warehouse 5 - 25 spaces Shower and bathroom facilities are provided in each tenancy to support travel modes other than cars and will be available to employees and visitors to the site.	Yes

Operational Traffic Impacts

In consultation with TfNSW, it was advised that traffic effects of the proposed development should be assessed utilising SIDRA modelling and include two intersections:

- Great Western Highway and Flushcombe Road (west of the site); and
- Great Western Highway and Prospect Highway connection (currently under construction – above the eastern portion of the site).

TfNSW suggested using data from the traffic report undertaken as part of the Prospect Highway REF to estimate future weekday AM/PM peak hour traffic flows along Great Western Highway.

Traffic generation from the site will have greatest effect during the weekday morning (7.00am to 9.00am) and afternoon peak period (4.00pm to 6.00pm) when it combines with other traffic on the surrounding road networks. However, traffic generated by the site will vary over the day as shown below:

Table 14 Distribution of Traffic Generation over a Typical Weekday

Time Period	% of Daily Traffic	Average Hourly Traffic Generation	% Heavy Vehicle
0000 – 0600	6%	55	30%
0600 – 0800	10%	270	15%
0800 – 0900	12.5%	670	10%
0900 – 1000	8%	430	15%
1000 – 1600	33%	222	20%
1600 – 1700	8%	430	15%
1700 – 1800	12.5%	670	10%
1800 – 1900	4%	215	15%
1900 – 2200	4%	70	25%
2200 – 2400	2%	55	30%

Source: CBRK

Traffic generation associated with the proposed development has been determined in accordance with the TfNSW *Guide to Traffic Generating Developments* and is summarised in **Table 15**.

Table 15 Existing and Proposed Traffic Generation

Road / Location	Morning		Afternoon	
	Existing	+ Development	Existing	+ Development
Great Western Highway				
– east of Prospect Highway	3,050	+235	3,550	+235
– east of Flushcombe Road	2,860	+305	3,470	+305
– west of Flushcombe Road	3,235	+265	3,525	+265
Flushcombe Road				
– north of Great Western Hwy	1,245	+100	1,365	+100
– south of Great Western Hwy	80	+340	75	+340

Road / Location	Morning		Afternoon	
Prospect Highway Connection				
– north of Great Western Hwy	700	+60	840	+60
Site Accesses				
– Warehouse 5 (GWH)	0	+320	0	+320
– Warehouses 1-4 (Augusta Street)	0	+340	0	+340

Source: CBRK

From SIDRA analysis of the existing traffic flows at Great Western Highway / Flushcombe Road operates with an average delay of less than 40 seconds per vehicle during morning and afternoon periods (level of service – C \ Satisfactory). The Prospect Highway intersection is not yet constructed. Traffic movements are based on the movements through the adjacent Great Western Highway / Flushcombe Road intersection.

From SIDRA analysis of the nominated intersections against the impacts of the proposed development:

- Great Western Highway \ Flushcombe Road: operate with average delay at 40 seconds per vehicle (morning) and 48 seconds per vehicle (afternoon). This represents a level of service of C/D satisfactory.
- Great Western Highway \ Prospect Highway: operate with average delay at 30 second per vehicle during both weekday morning and afternoon peak. This represents a level of service of B/C, good to satisfactory.

These results indicated that the intersections required for site access maintain a good to satisfactory operation with acceptable detailed during the AM and PM peak.

Cumulative Traffic Impacts

To calculate the 10 year future traffic flows with and without the development, the traffic report from the Prospect Highway REF noted that *“from 2018 to 2028 traffic will grow at about 1.2 per cent per year and beyond 2028 will grow at about one per cent per year.”* These growth rates have been used to estimate 2033 traffic flows. Incorporating these levels of growth:

- Great Western Highway \ Flushcombe Road – less than 70 second delay during weekday morning and afternoon periods. This represents a level of service E, at capacity.
- Great Western Highway \ Prospect Highway – less than 25 second delay during weekday morning and afternoon peak periods. This represents a level of service B or good level.

With the implementation of the proposed mitigation measures in **Section 6.1.4.3**, the 2033 traffic impacts with the proposed development would be:

- Great Western Highway \ Flushcombe Road – less than 40 second delay during weekday morning and less than 45 second delay in weekday afternoon periods. This represents a level of service C/D or satisfactory level.
- Great Western Highway \ Prospect Highway – less than 30 second delay during weekday morning and afternoon peak periods. This represents a level of service B/C or good to satisfactory level.

With the identified upgrades, the surrounding road network can cater for a 2033 traffic outcome plus development with both nominated intersections at a satisfactory or above level.

Green Traffic Plan

Principles for the development of a future Green Travel Plan (**GTP**) have been included as part of the TAIA. A GTP will be developed as a condition of consent for the proposed development. The GTP will adopt a transport management approach and provide a site-specific management strategy for delivering long term behavioural changes and sustainable travel plans, increasing walking, cycling, public transport, car sharing and carpooling modes of transport. It will include a review of existing transport options available and set targets so that the effective implementation of the plan can be assessed.

The GTP will be refined in consultation with Council, TfNSW, public transport operators, and other stakeholders. It will include the following action strategies to achieve the transport mode split target:

- Travel planning and demand management.
- Encourage the use of public transport.
- Encourage active transport (cycling or walking).
- Influencing travel behaviours through employee and design interventions.

The GTP will be monitored to ensure that it is meeting its objectives and is having the intended impact on car use and transport choices for employees and visitors. The plan will be updated to reflect changing circumstances and to identify which initiatives are having an impact or need to be modified to ensure appropriate travel behaviour.

Construction Traffic Impacts

A draft Construction Traffic Management Plan (**CTMP**) has been prepared to establish broad principles for traffic management to minimise traffic impacts on the surrounding road network, ensure safety and efficiency for workers, pedestrians, and road users, and provide information regarding construction vehicle access routes. The final CTMP will be prepared in consultation with Blacktown Council.

During excavation and construction, trucks removing spoil and transporting material to the site will be accommodated on-site. Access to and from the site will be provided from Flushcombe Road and Augusta Street, via temporary construction access driveways. Alternate temporary access arrangements will be required for the eastern part of the site, onto the Great Western Highway, given Blacktown Creek divides the site.

The proposed truck routes for the removal of spoil from the site and for the delivery of construction materials include the Great Western Highway, M4 Western Motorway, Prospect Highway, Reservoir Road and Flushcombe Road. Truck drivers will be inducted and advised of the designated truck routes to and from the site.

The number of vehicles generated during the various stages of construction will be determined when the construction methodology, process and staging is finalised by the builder. The peak construction traffic activity will generally occur during bulk excavation, with the removal of excavated material from the site, and during concrete pours, with the delivery of concrete to the site.

6.1.4.3. Mitigation Measures

Construction

A detailed CTMP will be prepared in response to any conditions of consent at a time when a construction contractor methodology is known (ie, final details of work zone requirements, oversized vehicles etc).

Operation

To accommodate the current additional development traffic to the surrounding road networks, the following works should be undertaken:

- Great Western Highway/Flushcombe Road Traffic Signals
 - Extend the existing right turn bay on Great Western Highway (eastern approach) by some 50 metres.
 - Provide a separate signalised left turn lane (some 120 metres) on Great Western Highway (eastern approach).

- Upgrade the Flushcombe Road (northern approach) to provide two lanes, a shared left/through lane and separate right turn lane.
- Modify the existing pedestrian crossing of the Great Western Highway (western approach) to a staged crossing. TfNSW has indicated that any upgrade of the intersection would require provision of pedestrian crossing on approaches to the intersection. With a pedestrian crossing on the eastern approach, consideration should be given to deleting the pedestrian crossing on the western approach.
- Flushcombe Road/Augusta Street
 - Upgrade Flushcombe Road (between Great Western Highway and Augusta Street) and Augusta Street to the Huntingwood Precinct DCP requirements. This includes provision of a 27 metre diameter turning head at the end of Augusta Street.
- Great Western Highway/Prospect Highway Connection Traffic Signals
 - Modify the proposed t-intersection traffic signals to provide a fourth (southern) approach for access to Warehouse 5.
 - To maintain a three phase operation of the traffic signals, no through movements between Warehouse 5 and the Prospect Highway Connection would be permitted (access to Warehouse 5 would be limited to left and right turns to/from Great Western Highway).
 - Provide a separate right turn bay on Great Western Highway (western approach).
 - Provide a separate signalised left turn lane on Great Western Highway (eastern approach).
 - Provide a new southern approach to the intersection with two lanes (separate left and right turn lanes).
 - Provide a pedestrian crossing on the southern approach to the intersection.
 - Provide a 4 metre wide shared cycle/pedestrian path along the Great Western Highway frontage of the site.

To accommodate future traffic from the development up to 2033, the following works should be undertaken:

- Great Western Highway / Flushcombe Road
 - Provide a third lane on the Flushcombe Road northern approach, configured as a separate left turn slip lane (some 30 metres long), shared through/right turn lane and separate right turn lane (some 100 metres).
 - Reconfigure the existing pedestrian crossing on the Great Western Highway western approach to staged crossing.
 - Modify the signal phasing to split phasing on the Flushcombe Road approaches.
 - Provide a third lane on the Flushcombe Road southern approach, configured as a separate left turn lane (some 40 metres long), shared through/right turn lane and separate right turn lane.

6.1.5. Biodiversity

Anne Clements and Associates Pty Ltd prepared a Biodiversity Development Assessment Report (**BDAR**) for the proposed development and is provided at **Appendix P**. The BDAR assesses the proposed development in accordance with the BC Act regarding any biodiversity impacts associated.

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 AnneMarie Clements.

6.1.5.1. Existing Environment

The Plant Community Type (**PCT**) that best characterises the site is PCT 3319 – Cumberland Shale Hills Woodland. From a review of site mapping from the Office of Environment and Heritage and NSW State Vegetation Type Map, as well as previous and current surveys of the site, the extent of native vegetation

zones include 2.03ha degraded PCT 3319 and 0.34ha of less degraded PCT 3319. Of the vegetation zones, it is proposed that 0.52ha of the site be cleared and 1.85ha be retained.

The site is crossed by Blacktown Creek, a south to north flowing mapped 1st Order watercourse with a recommended 10m wide Vegetation Riparian Zone and 20m channel width in the eastern portion of the sit. The drainage swale from controlled stormwater discharge basins from the Western Motorway (flowing to the north under the Great Western Highway) is not a mapped watercourse as confirmed with correspondence from NRAR.

There are 640 trees with the most frequently recorded trees being *Eucalyptus moluccana*, *Eucalyptus tereticornis*, and *Grevillea robusta*, which are located primarily in the western and eastern edges of the site. The following threatened species onsite were considered in the assessment of the site:

- Green and Golden Bell Frogs (*Litoria aurea*)
- Cumberland Plain Land Snail (*Meridolum corneovirens*)
- Southern Myotis (*Myotis macropus*)
- Koalas (*Phascolarctos cinereus*)

There were no threatened candidate species recorded onsite during site surveys.

6.1.5.2. Potential Impacts

The proposal includes the removal of 501 trees, with 139 trees to be retained and protected. The trees to be removed are generally clustered in the western part of the site around the western swale and scattered across the site as shown in the figures on the following page.

The proposed clearing will require offsetting under the Biodiversity Offset Scheme as the nominated clearance is greater than 0.25ha. The landscape strategy seeks to off-set the trees loss by the conservation and rejuvenation of the conservation areas and landscaped setbacks, including planting of 2,000 trees.

Figure 24 – Location of Canopy Trees



Source: Canopy Consulting

Figure 25 – Vegetation Zones



Source: Anne Clements & Associates

6.1.5.3. Mitigation Measures

Mitigation and management measures proposed for any residual impacts of the development include:

- A site specific Vegetation Management Plan (**VMP**) should be developed in conjunction with the Construction Management Plan as a condition of consent.
- Appoint an experienced Restoration Ecologist and Construction Manager to design, supervise and implement works in accordance with a Vegetation Management Plan.
- Conservation awareness of all persons onsite and the awareness of the No-Go Areas.
- Clearly identify No-Go areas onsite and on plan
- Ensure efficient re-use of conservation assets onsite from areas being cleared.
- Ensure hygiene protocols in place.
- Pre-clearance fauna survey and relocation of native fauna to areas of retained vegetation.
- Implement monitoring and corrective actions.

There are opportunities for additional off-site mitigation measures which would need to be negotiated through further consultation with Blacktown City Council, including:

- Bush regeneration downstream along Blacktown Creek including in Timbertop Reserve (zoned C2 – Environmental Conservation) which is mapped as an Important Habitat Area for the Swift Parrot;
- Planting of local native trees in the RE1 - Public Recreation zoned land north of the Great Western Highway; and
- Planting of local native trees in the residential land north of the Great Western Highway for minimisation of heat island effects for the local residents.

The above works could be included as conditions of consent or incorporated within the draft Planning Agreement, as considered appropriate.

Beyond the mitigation measures identified above, for any serious and irreversible impacts to the Cumberland Shale Hills Woodland, ecosystem credits will be required, noting the proposal is unlikely to contribute significantly to the risk of extinction of PCT 3319. Ecosystem credits in the order of that listed in the following table will be required.

Table 16 Ecosystem Credit Calculation

Vegetation Zone	TEC	Impact area	Current VI score	Future VI score	Change in VI score	Biodiversity risk weighting	Number of ecosystem credits required
PCT 3319 – degraded	CPW	0.45	24	0	-24	2	6
PCT 3319 – less degraded	CPW	0.07	56.2	0	-56.2	2	2
Total							8

Source: Anne Clements & Associates Pty Ltd

As no candidate species were identified, no species credits will be required for offset.

6.1.6. Noise and Vibration

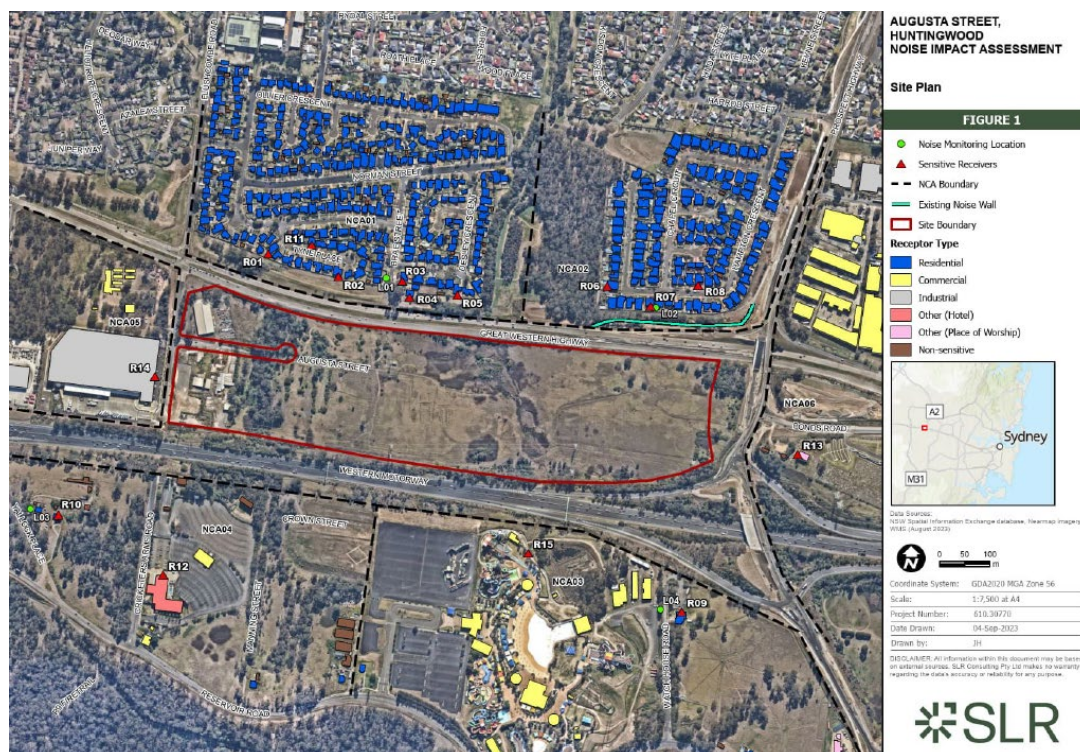
SLR Consulting was engaged to prepare a Noise and Vibration Impact Assessment (NVIA) which identifies and analyses potential acoustic and vibration impacts associated with the construction and operation of the proposal on the nearest sensitive receivers during all relevant weather conditions.

The report has been prepared in accordance with the SEARs issued for the SSDA, relevant conditions in SSD-36138263 and legislative requirements and guidelines. The assessment considered the proposed operations, which will operate 24 hours a day, 7 days a week. Noise modelling of the development site was undertaken using the noise prediction algorithms in SoundPLAN modelling software.

6.1.6.1. Existing Environment

The noise sensitive receivers in the vicinity of the proposed development are shown in the following figure.

Figure 26 – Noise Sensitive Receivers



Source: SLR Consulting

The area surrounding the development has been divided into six Noise Catchment Areas (**NCA**s). Surrounding sensitive receivers include residences (NCA01, NCA02, NCA03 and NCA 04), hotel (NCA04), a place of worship (NCA06), industrial (NCA05) and commercial premises (NCA03).

The nearest receivers are commercial developments located approximately 30 metres west of the site (421-427 Flushcombe Road, Blacktown). The nearest residential receivers are located around 65 metres to the north of the site (21 Brae Street, Prospect) and 260 metres to the south (24 Watch House Road, Prospect).

Unattended noise monitoring was completed in the study area in May 2022. The measured noise levels have been used to determine the existing noise environment and to set the criteria used to assess the potential impacts from the proposal. The four unattended noise monitoring locations and the results are summarised in the table below.

Table 17 Summary of Unattended Existing Noise Monitoring Results

ID	Address	Measured Noise Level (dB(A))					
		Background Noise (RBL)			Average Noise (LAeq)		
		Day	Evening	Night	Day	Evening	Night
L01 (NCA01)	18 Brae Street Prospect	48	50	44	55	55	53
L02 (NCA02)	47 Hampton Cres	47	46	39	55	53	51
L03 (NCA04)	10 Yallock Place Prospect	55	55	48	59	59	57
L04 (NCA03)	Watch House Road Prospect	49	49	45	55	54	52

Source: SLR Consulting

The attended measurements were generally found to be consistent with the results of the unattended noise monitoring and show that existing ambient noise levels are typically dominated by road traffic noise from the surrounding road network, including the M4 Motorway to the south and the Great Western Highway to the north of the proposed site, and industrial noise from existing industrial developments for receivers south of the M4 Motorway.

6.1.6.2. Potential Impacts

The noise assessment has been completed based on assumptions regarding the future tenants and sources of noise from the proposed building design and layout. Conservative assumptions have been made to capture the potential worst coast noise emissions from potential warehouse operations.

The potential operational noise levels from the proposal have been predicted based on ground topography, ground type (ie residential areas, grassland reserves and industrial areas), buildings and representative worst-case noise sources from the proposal. The following operational noise sources have been considered:

Table 18 Summary of Modelled Realistic Worst-Case 15 Operational Scenarios

Warehouse	Noise/Source	Modelled Scenario		
		Daytime	Evening	Night-time
Warehouse 1	Heavy Vehicles – Truck access road and hardstand	1 heavy truck	1 heavy truck	1 heavy truck
	Loading dock activities – Hardstand Area	1 truck reversing in hardstand areas including airbrake release at end. 1 electric forklift loading/unloading trucks, including reversing alarms.	1 truck reversing in hardstand areas including airbrake release at end. 1 electric forklift loading/unloading trucks, including reversing alarms.	1 truck reversing in hardstand areas including airbrake release at end. 1 electric forklift loading/unloading trucks, including reversing alarms.
	Light Vehicles – Car park	7 light vehicles	4 light vehicles	2 light vehicles
	Mechanical Plant – Office and Warehouse Roof	1 office air conditioning unit 2 warehouse extraction fans	2 warehouse extraction fans	2 warehouse extraction fans
	Internal Activities	Internal forklift operations modelled at roller doors when open during loading dock activities	Internal forklift operations modelled at roller doors when open during loading dock activities	Internal forklift operations modelled at roller doors when open during loading dock activities
Warehouse 2	Heavy Vehicles – Truck access road and hardstand	2 heavy trucks	1 heavy truck	1 heavy truck
	Loading dock activities – Hardstand Area	2 trucks reversing in hardstand areas including airbrake release at end. 2 electric forklifts loading/unloading trucks, including reversing alarms.	1 truck reversing in hardstand areas including airbrake release at end. 1 electric forklift loading/unloading trucks, including reversing alarms.	1 truck reversing in hardstand areas including airbrake release at end. 1 electric forklift loading/unloading trucks, including reversing alarms.
	Light Vehicles – Car park	14 light vehicles	7 light vehicles	4 light vehicles

Warehouse	Noise/Source	Modelled Scenario		
		Daytime	Evening	Night-time
	Mechanical Plant – Office and Warehouse Roof	1 office air conditioning unit 3 warehouse extraction fans	3 warehouse extraction fans	3 warehouse extraction fans
	Internal Activities	Internal forklift operations modelled at roller doors when open during loading dock activities	Internal forklift operations modelled at roller doors when open during loading dock activities	Internal forklift operations modelled at roller doors when open during loading dock activities
Warehouse 3-4	Heavy Vehicles – Truck access road and hardstand	7 heavy trucks	2 heavy trucks 2 rigid trucks	1 heavy truck 1 rigid truck
	Loading dock activities – Hardstand Area	7 trucks reversing in hardstand areas including airbrake release at end. 7 electric forklifts loading/unloading trucks, including reversing alarms.	4 trucks reversing in hardstand areas including airbrake release at end. 4 electric forklifts loading/unloading trucks, including reversing alarms.	2 trucks reversing in hardstand areas including airbrake release at end. 2 electric forklifts loading/unloading trucks, including reversing alarms.
	Light Vehicles – Car park	58 light vehicles	29 light vehicles	15 light vehicles
	Mechanical Plant – Office and Warehouse Roof	4 office air conditioning units (1 per office) 10 warehouse extraction fans	10 warehouse extraction fans	10 warehouse extraction fans
	Internal Activities	Internal forklift operations modelled at roller doors when open during loading dock activities	Internal forklift operations modelled at roller doors when open during loading dock activities	Internal forklift operations modelled at roller doors when open during loading dock activities
Warehouse 5	Heavy Vehicles – Truck access road and hardstand	8 heavy trucks	2 heavy trucks 2 rigid trucks	1 heavy truck 1 rigid truck

Warehouse	Noise/Source	Modelled Scenario		
		Daytime	Evening	Night-time
	Loading dock activities – Hardstand Area	8 trucks reversing in hardstand areas including airbrake release at end. 8 electric forklifts loading/unloading trucks, including reversing alarms.	4 trucks reversing in hardstand areas including airbrake release at end. 4 electric forklifts loading/unloading trucks, including reversing alarms.	2 trucks reversing in hardstand areas including airbrake release at end. 2 electric forklifts loading/unloading trucks, including reversing alarms.
	Light Vehicles – Car park	73 light vehicles	37 light vehicles	19 light vehicles
	Mechanical Plant – Office and Warehouse Roof	4 office air conditioning units (1 per office) 8 warehouse extraction fans	8 warehouse extraction fans	8 warehouse extraction fans
	Internal Activities	Internal forklift operations modelled at roller doors when open during loading dock activities	Internal forklift operations modelled at roller doors when open during loading dock activities	Internal forklift operations modelled at roller doors when open during loading dock activities

Source: SLR Consulting

The findings of the NVIA concluded that:

- With the implementation of the identified mitigation measures, the predicted operational noise levels generally meet the Potential Noise Trigger Level (**PNTL**) except for R04 within NCA01 (residential receiver at 21 Brae Street, Prospect) which exceeds the PNTL by 1dB.
- In relation to sleep disturbance:
 - Maximum noise levels are generally expected to comply with the sleep disturbance screening level except for nearest receivers in NCA01 (R01, residential receiver at 4 Tyne Place, Prospect) when truck airbrakes are used. However, most heavy vehicles accessing the site during the night-time are expected to be rigid trucks which generally do not use airbrakes.
 - As required by the NSW Noise Policy for Industry (**NPfi**), a detailed maximum noise level assessment is completed where night-time noise levels exceed the screening level. This assessment concludes the predicted infrequent sleep disturbance exceedances are of low significance and do not warrant any further mitigation measures as:
 - Infrequent truck airbrakes are expected to be below the levels outlined in the Road Noise Policy (**RNP**) considered to have the potential to result in an 'awakening response' at the nearest receivers in NCA01.
 - Most night-time deliveries are expected to be via rigid trucks which are quieter and generally do not use airbrakes.
 - The Great Western Highway is located between the development site and nearest residential receivers in NCA01 and the maximum noise events from infrequent truck airbrakes at the

development are lower than existing maximum noise levels from vehicles on the Great Western Highway.

- Specific mitigation measures are recommended to minimise potential sleep disturbance impacts, including noise source controls and noise path controls. Noise source controls include implementation of noise sensors, operational measures such as closing roller shutter doors and preparation of an Operational Noise Management Plan (**ONMP**). Noise path controls include three metre high acoustic walls and noise mound design interventions in front of Warehouses 1, 4 and 5. Noise monitoring will also be undertaken as part of the operational phase of development.
- In relation to construction impacts:
 - Vibration intensive equipment required during the construction includes rock breakers and vibratory rollers during demolition and earthworks. The NVIA provides minimum offset working distances for vibration intensive equipment for Buildings 1 to 5 and shows all sensitive receiver buildings are sufficiently distant and cosmetic damage impacts not considered likely.
 - Commercial receivers to the west and residential receivers along the Great Western Highway in NCA01 (north of Warehouse 3) and NCA02 (north east of Warehouse 5) are within the human comfort minimum working distance and occupants of these buildings may be able to perceive vibration impacts at times when large hydraulic hammers are in use nearby. Where impacts are perceptible, they would likely only be apparent for relatively short durations when vibration intensive equipment is in use and reasonable mitigation measures should be applied.
 - St Bartholomew's Church, is expected to be sufficiently distant from the site to be outside the minimum working distance for heritage items (ie 50 metres for a large vibratory roller) and impacts are not considered likely.

6.1.6.3. Mitigation Measures

The following mitigation measures should be implemented with the proposed development to minimise noise impact to the surrounding sensitive receivers:

Construction Impacts

The impacts during construction of the project are predicted to be moderate and consistent with major construction work near to sensitive receivers. The use of standard mitigation measures to minimise the impacts is considered sufficient to control the majority of the impacts.

A Construction Noise and Vibration Management Plan (**CNVMP**) would be prepared before any work begins. This would identify all potentially impacted receivers, assess the potential noise and vibration impacts from the project and provide details regarding how the impacts would be minimised through the use of all feasible and reasonable mitigation measures. The CNVMP would also contain procedures for handling complaints, should they occur, and detail any compliance monitoring requirements.

Operational Noise impacts

The following key measures have been applied to reduce noise emissions:

- Use of broadband and/or ambient noise sensing reversing alarms to minimise potentially annoyance.
- Roller doors will be kept closed when un/loading is not occurring.
- Increase wall height on northern edge of the Building 5 – Level 2 access ramp to 3 metres to act as noise barriers. This will increase shielding of heavy vehicle movements with high engine load on the access ramp.
- Installation of a 3 metre high noise mound along the perimeter of the Building 3 and 4 truck access road. This measure will reduce noise from heavy vehicle movements on internal roads with a benefit of up to 5dB reduction to the nearest sensitive receiver.
- Installation of a 3 metre high noise barrier along the northern and eastern perimeter of the Building 1 hardstand area. This will reduce noise propagation from heavy vehicle movements and loading/unloading activity expected to provide a benefit of up to 6dB from operations within the hardstand area.

- Installation of a 3 metre high noise barrier in the north-western boundary of Building 5 along the truck exit road. This will reduce noise propagation of heavy vehicle movements and is expected to provide a benefit of up to 5dB from movements exiting the site.

6.2. 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.

6.2.1. Trees and Landscaping

6.2.1.1. Tree Removal and Retention

The site has been historically cleared, with scattered trees located along the western and southern boundaries as well as in the north-eastern corner. Blacktown Creek runs north-south through the central part of the site with riparian vegetation along the corridor. Blacktown Creek in the east and the swale in the west are dominated by exotic plantings, including emergent eucalypts along the swale in the west.

Canopy Consulting (2023), as part of the BDAR, assessed a total of 421 trees or groups of trees (as defined per Blacktown DCP of at least three metres in height, and/or a trunk diameter of at least 200 mm measured one metre above ground level). Canopy identified:

- Of the 27 species identified by the arborist, there were only 3 local native species (*Acacia* sp., *Eucalyptus moluccana*, *Eucalyptus tereticornis*). The remaining 24 species recorded were either exotic (12 species) or non-local native (12 species) (planted and/or naturalised onsite).
- The most frequently recorded trees were the local native canopy trees *Eucalyptus moluccana* and *E. tereticornis*, followed by non-local native tree *Grevillea robusta*
- Of the 288 local native canopy trees (145 *Eucalyptus moluccana* and 143 *E. tereticornis*), health rating ranged from Dead, Very poor, Poor, Fair to Good. The percentage of trees in Good health was higher for *E. moluccana* (68%) than *E. tereticornis* (50%). Overall, only 59% of the local native canopy species (171 of the 288 trees) were in Good health.

A Landscape Plan has been prepared by Habit8 and is provided at **Appendix N**. The information from the landscape plan and BDAR enables assessment of the number, location of trees to be removed and retained, as well as details of the proposed site planting including location, number, species, heights at maturity and proposed canopy coverage.

From the current masterplan design, Canopy Consulting have confirmed a total of 501 trees will be removed, as outlined in the following table.

Table 19 Proposed Tree Removal

Recommendation	Total Tags	Total Tree Quantity	Recommendation
Remove	310	501	Remove
May be Retainable	3	3	May be Retainable
Likely Retainable	108	136	Likely Retainable
Total	421	640	Total

Source: Canopy Consulting

A total of 2,000 canopy replacement trees are proposed, enabling 43,243sqm of total sqm of canopy cover or 16.23% of new canopy cover across the site.

Landscaping has been maximised through the biodiversity conservation areas and the two watercourse corridors. The proposal provides an abundance of landscaped area onsite, retaining 8.6ha of current landscaped area including rehabilitation works as well as 0.8ha of additional landscaped areas for a total 9.4ha (35% of the site).

A BDAR has been proposed for the proposed development (refer **Section P**). The proposed development results in the clearing of 0.45ha of 'degraded' rated vegetation and 0.07ha of 'less degraded' vegetation. This loss of vegetation will be compensated via greater landscaping onsite (0.8ha) and the purchasing of Biodiversity Credits

6.2.1.2. Landscape Design

As outlined previously in Section 3.2.2.4, the proposal incorporates a considered site-wide landscaping strategy prepared by Habitat8 (refer **Appendix N**). The proposed landscape outcomes include conservation of the natural environment, increased access to open space, improved connectivity to promote active living and increase urban greening to ameliorate climate extremes. The proposal includes:

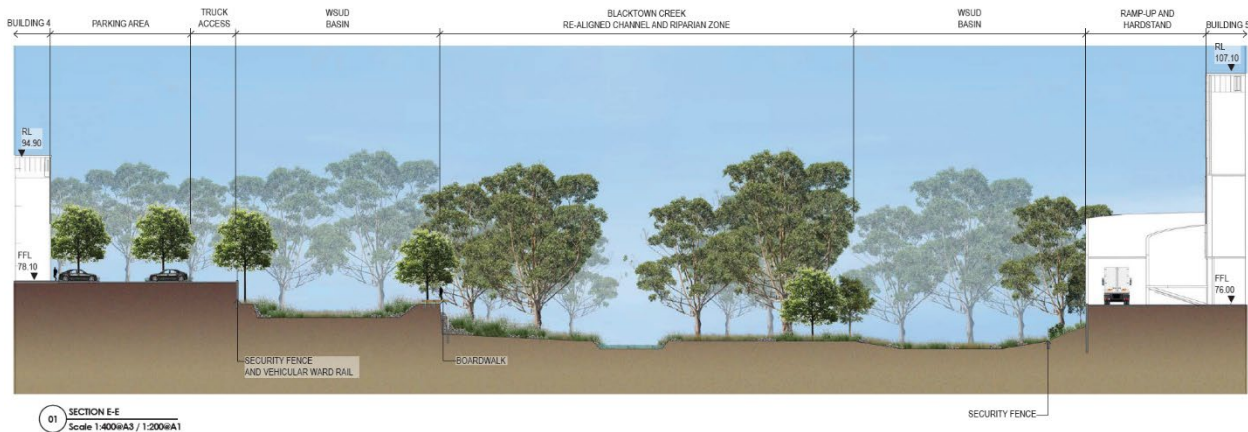
- Landscaped theming across the estate comprising entry feature planting along Flushcombe Road, Augusta Street and the entry to the multi storey warehouse on Great Western Highway, car park and office planting and conservation planting.
- Street verges and front setbacks are densely planted with canopy trees ranging from six metres to over 15 metres in height and canopy spread.
- The strategy for re-vegetating the site focuses on canopy tree planting to reduce the urban heat island effect. Regeneration shall be implemented along the major road setbacks for existing vegetation buffers.
- The landscaping includes a mix of local endemic, native and exotic trees to strengthen the urban design principles and to comply with current sustainability guidelines. Robust, low maintenance species will provide interest through textured foliage and seasonal colour.
- Integrated landscape and WSUD principles have been incorporated into the design. WSUD principles including soft engineering through bio-swales, detention basins and grey water re-use (co-ordinated with the civil engineer) shall help in maintaining and managing the revegetation areas.
- Car park areas are shaded by tree planting between car parking spaces. Cycleways and path systems are also shaded by canopy tree planting.
- Large canopy tree planting as well as screening shrubs are proposed along the northern boundary to soften the visual impact of the proposed warehouse buildings. Landscaped mounding is provided for acoustic mitigation within the front setback adjacent to Warehouses 3 and 4, with three metre high acoustic walls provided behind the landscaped setbacks.
- Boardwalk song lines and reflection areas are provided in the eastern conservation area to provide additional amenity for employees on the site.
- 9.4 hectares of landscaped area is provided which equates to 35% of the site area. This includes 8.6ha of conservation planting, comprising 1.3 hectares of conservation planting (bioretention basin), 2.3 hectares of conservation planting along the site watercourses and 3.5 hectares under the electricity easement.

Figure 27 – Extract of the Landscape Masterplan



Source: Habitat8

Figure 28 – Landscape Section - Blacktown Creek Corridor



Source: Habitat8

6.2.2. Ecologically Sustainable Development (ESD)

An ESD Report has been prepared by E-LAB Consulting provided at **Appendix O** to detail the proposed development's approach and implementation of ESD initiatives and assess the proposed development against SEARs Item 8, Clause 2.19 of the I&E SEPP, and section 193 of the EP&A Regulation. The ESD initiatives integrated into the development have been guided by the following frameworks:

- Industry and Employment SEPP
- HDCP 2011
- Green Star Design & As Built v1.3
- Planning for Net Zero by 2050

The proposed development responds to the ESD principles set out in section 193 of the EP&A Regulations as outlined below:

- The precautionary principle

The proposed development is committed to going beyond the minimum benchmark requirements for sustainability to the benefit of future generations such as targeting a 5 star Green Star Design & As Built v1.3 rating and the potential implementation of major solar PV array on the warehouse roofs.

- Inter-generational equity

The design will address key elements such as energy, potable water, and material consumption to afford future generations ecological equality. This includes the management of rainwater and stormwater, with low flow water fixtures, drought resistant planting, and capturing rainwater for reuse onsite.

- Conservation of biological diversity and ecological integrity

The proposed development commits to planting native vegetation and implementing integrated landscaping to enhance the overall ecology and biodiversity of the site.

- Improved valuation, pricing and incentive mechanisms

The project will target a waste diversion target of 90% as well as develop specific project waste management strategy to ensure the proposed development pays for the waste and damage it creates.

The proposed development will meet or exceed relevant sustainable and environmental performance standards. A 5 star Green Star Design & As Built v1.3 pathway has been developed within the ESD Report for the proposed development, accreditation projected as a post development consent task. Appendix A of the ESD Report details each credit type, the credit criteria with direction for how the criteria will be met by the proposal. The 65.7 points required for 5-star Green Star Design & As Built v1.3 accreditation will be achieved through employing some of the following practical directions:

- Engage an ESD consultant (E-LAB Consulting) through the project to advise detailed development and to prepare Green Star submission.
- Prepare management documents and systems through the detailed design process to monitor sustainability outcomes of the site including:
 - Climate Adaption Plan.
 - Environmental Management Plan.
 - Energy Management Systems (**EMS**) energy metering products.
- Indoor environment quality measures such as ASHRAE 62.1 standard Heating, Ventilation and Air Conditioning (**HVAC**) systems.
- Establishing renewable targets for development operations including:
 - 45% reduction in Green House Gas (**GHG**) emissions when compared to benchmark buildings.
 - 20% reduction in peak electricity demand of the proposal.
- 5% of the car parking spaces to be installed with electric charging capabilities.
- Undertake a Life Cycle Assessment of the proposal to determine opportunities to reduce embodied carbon and operational GHGs.

Accreditation for Green Star Design & As Built v1.3 will be undertaken by the E-LAB consulting as a post consent matter. The development will comply with the requirements of Section J under the National Construction Code 2022 (**NCC**).

Greenhouse Gas emissions (**GHGe**) and consumption of energy, water and material resources will be minimised through a range of measures, including Water Sensitive Urban Design (**WSUD**) which reduces the impact of urban heat island effect. This includes tree plantings with wide canopies and implementation of light-coloured materials for the warehouses, implement a green travel plan, minimise construction waste with less than 5kg per square metre of GFA going to landfill, and target implementation of large PV arrays on the roofs of the warehouses.

6.2.3. Air Quality

An Air Quality Impact Assessment (**AQIA**) has been prepared by SLR and is provided at **Appendix Q**. The assessment provides an analysis of the air quality impacts of the proposed development on surrounding sensitive receivers during the construction and operation of the proposed development.

The site is located within a mixed precinct comprising a mix of industrial, residential and commercial (entertainment facilities) receivers. The Great Western Highway and M4 Motorway run along the northern

and southern boundaries. The closest residential receivers for the purposes of the AQIA are located approximately 65 metres to the north of the Great Western Highway. Industrial receptors are on the neighbouring lots to the west and Raging Waters is 400m to the south.

6.2.3.1. Construction Impacts

The main air quality impacts associated with construction works relate to emissions of fugitive dust. The potential for dust to be emitted during the construction works will be directly influenced by the nature of the activities being performed at any given time. Generally, the activities that are most likely to lead to short-term emissions of dust, include:

- Grading;
- Loading and unloading of materials;
- Wheel-generated dust and combustion emissions from construction equipment;
- Wheel-generated dust from trucks travelling on unpaved surfaces; and
- Wind erosion of exposed surfaces.

The AQIA assesses the construction phase air quality impacts associated with the proposal using a risk-based assessment procedure. This determines the activities that pose the greatest risk, which allows the CEMP to focus controls to manage that risk appropriately and reduce the impact through proactive management.

The results indicate that there is a low risk of adverse dust soiling and human health impacts occurring at the off-site sensitive receptor locations during the earthworks, and construction phases or from trackout, if no mitigation measures were to be applied to control emissions during the construction works. Subject to the implementation of the recommended mitigation measures, the results of the assessment indicate that there will be a negligible adverse dust and human health impact at sensitive receiver locations during the construction phase.

The risk of cumulative impacts can be reduced by strong adherence to a Construction Air Quality Management Plan (**CAQMP**). It is recommended that any CAQMP includes communication with surrounding construction sites where possible to avoid scheduling of dusty activities at the same time.

The following mitigation measures have been recommended during the construction phase of the project:

Earthworks

- Measures that are not required but good practice:
 - Re-vegetate or cover (using hessian, mulches or trackifiers) earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable
 - Only remove the cover in small areas during work and not all at once.

Construction

- Measures that are desired:
 - Avoid scabbing (roughening of concrete surfaces) if possible.
 - Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.
- Not required but good practice measures:
 - Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery.
 - For smaller supplies of fine power materials ensure bags are sealed after use and stored appropriately to prevent dust.

Trackout

- Measures that are desired:
 - Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use.
 - Avoid dry sweeping of large areas.
 - Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.
 - Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).
- Not required but good practice measures:
 - Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits.
 - Access gates to be located at least 10 m from receptors where possible.

6.2.3.2. Operational Impacts

A semi-quantitative risk-based assessment has been undertaken to assess the proposal's operational activities. The key potential air quality issues identified for the operation phase of the proposal is the emissions of combustion products and particulate matter from vehicles travelling along the Great Western Highway and Flushcombe Road.

The assessment utilises the Tool for Roadside Air Quality (**TRAQ**) assessment tool which predicts air quality impacts of new or existing roads, typically in a conservative manner. The modelling focused on the sensitive receivers north of the site, nominating three segments to estimate air quality impact:

- Segment 1 - Great Western Highway west of Flushcombe Road.
- Segment 2 – Great Western Highway east Flushcombe Road and west of Warehouse 5 entrance.
- Segment 3 – Great Western Highway east of Warehouse 5 entrance.

The potential air quality impacts associated with the operation of the proposed warehouse or distribution centre tenancies are identified as follows:

- Emissions of products of fuel combustion and particulate matter associated with the trucks and other vehicles entering and leaving or idling at the site during loading/unloading operations include carbon monoxide (CO), oxides of nitrogen (NOx), particulate matter (PM10 and PM2.5), sulfur dioxide (SO2) and volatile organic compounds (VOCs).
- Consideration is required to be given to emissions of combustion products and particulate matter from vehicles travelling along the Great Western Highway and Flushcombe Road. Emissions are similar to existing emissions from traffic travelling along the surrounding road network. Given the scale of on-site vehicle parking and anticipated traffic generation rates, it is considered that the proposed impacts are minor compared to the emissions generated by traffic on the surrounding road network.
- A risk-based approach was undertaken to assess the risk of air emissions from the site impacting surrounding sensitive receivers. The results indicate that the predicted impact from the Project is below 3% of the relevant criteria at the receptor distance (for all pollutants and scenarios modelled. This is considered to be a negligible impacts.
- Given the high sensitivity of the potentially affected receptors and the negligible magnitude of the potential dust impact of the operations, the potential impact significance for the local receptors is concluded to be of neutral significance.
- No mitigation measures have been identified as being required for the operational phase with respect to air emissions.

The assessment concluded the project would not result in any measurable increase in cumulative air quality impacts at the nearest sensitive receptors, and air quality is not considered to be a constraint for the

proposal. In summary, with proper mitigation measures in place during the construction phase, air quality at the surrounding receptors should not be considered as a constraint for the proposal.

Internal vehicle emissions have not been considered in the assessment as the TRAQ model is only capable of modelling single roads, not complex road networks. The TRAQ model is a conservative screening level model, designed to overestimate impacts. Given the assessment of vehicles on the Great Western Highway had a negligible impact, any impact from the proposal roads is unlikely to result in a measurable increase in cumulative air quality impact. Vehicle pollutants were seen as the only relevant impact as mechanical plant is limited to air-conditioning equipment and extraction fans.

6.2.4. Ground and Water Conditions

A Geotechnical Investigation has been undertaken by PSM and included at **Appendix S** of this report. A Salinity Management Plan prepared by PSM and Acid Sulfate Soils Management Plan prepared by JBS&G have also been undertaken for the subject site and are included at **Appendix T** and **Appendix U** respectively.

With regard to the water condition onsite, Surface and Groundwater Impact Assessment has been undertaken as part of the Civil Report prepared by Costin Roe at **Appendix V**.

There technical investigation with relevant mitigation measures seek to assess the potential impacts on soil resources and groundwater from the proposed development as well as the salinity and aggressivity of the

6.2.4.1. Geotechnical

The surface ground condition of the site is characterised primarily by the Blacktown Creek which moves north-south through the middle of the site and two sets of high voltage transmission towers along the southern boundary. The surrounding land undulates and slopes towards Blacktown Creek. Localised areas around the site have been subject to fill works comprising clay materials. The subsurface condition of the site is as follows:

- Topsoil (0.0m) \ Clay to silty clay trace with gravel.
- Existing fill (0.1m – 0.3m) \ Clay to clay trace with gravel
- Natural soil (0.0m – 1.8m) \ Clay to clay trave gravel
- Bedrock A (1.2m – 3.5m) \ Shale
- Bedrock B (5.7m – 7.6m) \ Shale

The following interim geotechnical design advice was provided by PSM and will be implemented for the site:

- Foundations: It is anticipated that the development will include pad, or pile footings depending on the design loads. The two storey warehouse is likely to be supported by piles. The foundations will be designed in-line with the relevant Australian Standards.
- Temporary and Permanent Batters: Temporary batters of 2H:1V and permanent batters of 2.5H:1V the maximum slope angle for the proposed development. Any steeper batters will require inspection by an experienced geotechnical engineer.
- Retention: Cut in soil units steps than the recommended permanent batter slopes will need to be supported by a retaining wall.
- Slabs: The design of slabs can be based on a subgrade with the Young's Moduli included in the Geotechnical Report.
- Pavements: a California Bearing Ratio (**CBR**) of 2% can be adopted for subgrade and fill formed in bulk earthworks placed in accordance with the bulk earthworks specification.

6.2.4.2. Acid Sulfate Soils

A review of the Section 10.7 planning certificates and eSpade tool have concluded the area occupied by the site is characterised as "no known occurrence" or not likely to be affected by Acid Sulfate Soil materials.

6.2.4.3. Groundwater

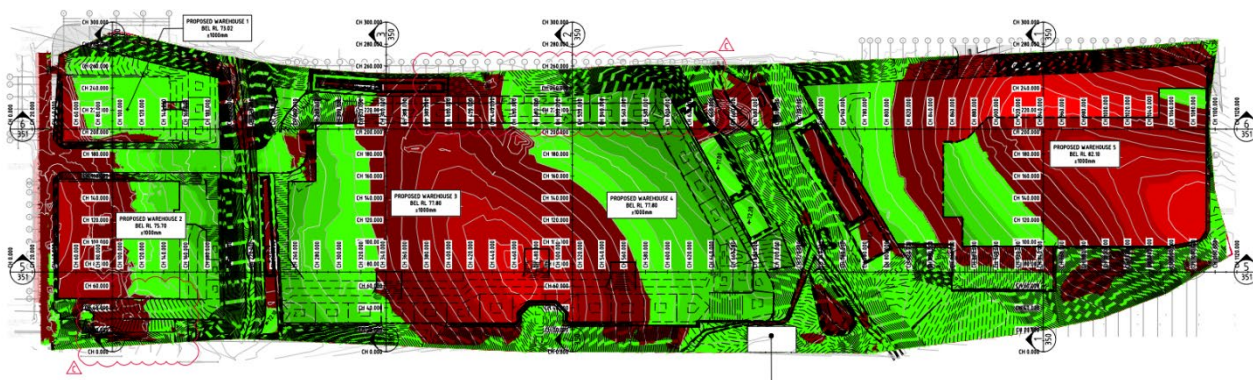
Groundwater was encountered during boring works at between 3.8m and 5.9m below the surface. Groundwater was only encountered at Borehole 11 and 14 in the north-western portion of the site. None of the other borehole testing observed groundwater.

Groundwater may be experienced at depth during construction works. Accordingly, the site earthworks will need to provide for:

- Pad Bulk Earthworks Levels at RLs of
 - 72.75m AHD (Warehouse 1).
 - 76.00m AHD (Warehouse 2).
 - 78.10m AHD (Warehouse 3).
 - 79.30m AHD (Warehouse 4).
 - 85.30m AHD (Warehouse 5).
- The required earthworks include up to 9.4m cut depth and 8.7m fill height as shown in the plan extract below.

It is recommended that surface water management, including conveyance of surface runoff, management of water quantity and water quality (using WSUD principles and best practice pollution reduction objective) be implemented. The specific water quantity and quality measures are outlined in **Section 6.2.6**.

Figure 29 – Cut and Fill Plan



Source: Costin Roe Consulting

6.2.5. Water Management

A Civil Engineering Report including Water Cycle Management Strategy has been prepared by Costin Roe and is provided at **Appendix V**.

The Civil Engineering Report undertakes a civil engineering assessment of the site and provides an assessment of the civil engineering characteristics of the site and technical considerations in relation to earthworks and geotechnical impacts. A Water Cycle Management Strategy (**WCMS**) has also been developed which seeks to address the competing demands placed on a region's water resources, while optimising the social and economic benefits of the development, enhancing and protecting the environmental values of receiving waters.

A summary of how each WCMS objective will be achieved is described below:

Stormwater Quantity Management

The intent of this criterion is to reduce the impact of urban development on existing drainage system by limiting post-development discharge within the receiving waters to the pre-development peak, and to ensure no affection of upstream, downstream, or adjacent properties.

Attenuation of stormwater runoff from the development is required in accordance with onsite detention requirements established in the "On-Site Stormwater Detention Handbook" prepared by the Upper Parramatta River Catchment Trust Fourth Edition dated December 2005 (UPRCT).

Stormwater Quality Management

There is a need to target pollutants that are present in stormwater runoff to minimise the adverse impact these pollutants could have on downstream receiving waters. The Model for Urban Stormwater Improvement Conceptualisation (**MUSIC**) modelling undertaken by Costin Roe demonstrates that the development can meet the nominated pollutant reduction targets as outlined in HDCP 2011 and summarised in the following table.

Table 20 Stormwater Treatment Targets and Results

Pollutant	Required Reduction	Modelling Reduction	Compliant
Total Suspended Solids (kg/yr) (TSS)	90%	90.1%	Yes
Total Phosphorus (kg/yr) (TP)	68%	71.1%	Yes
Total Nitrogen (kg/yr) (TN)	47%	53.1%	Yes
Gross Pollutants (kg/yr) (GP)	92%	100%	Yes

Source: Costin Roe Consulting

Flood Management

The proposed development has considered flooding and large rainfall events in relation to local runoff and overland flow paths as discussed in **Section 6.2.6**.

Stream Health

Stream Erosion Index (**SEI**) calculation has been made, in accordance with the methodology set out in Blacktown City Councils Water Sensitive Urban Design Handbook (2020). Blacktown City Council require that the post development duration of stream forming flows shall be no greater than 3.5 times the pre-development duration of stream forming flows with a stretch target of 1. Given On-Site Stormwater Detention (**OSD**) basins are provided across the site, it is not anticipated that ongoing SEI will be required.

Water Demand Reduction / Rainwater Reuse

Rainwater re-use measures will be provided as part of future building development designs, including collection of roof run-off in rainwater tanks. Rainwater re-use will reduce demand on non-potable uses by 80%, including toilet flushing and irrigation.

Stormwater Management During Construction

A construction stormwater management plan and associated erosion and sediment control measures is proposed based on Landcom Blue Book and Council requirements. The management measures take a staged approach from initial site establishment, construction stages and the period between the completion of the estate infrastructure works and development of individual lots.

As required by HDCP 2011, trunk drainage outside of the watercourse discharge points will be a pipe designed for the 1% AEP (1 in 100 year ARI) floor providing a fail-safe overland flow path dedicated that can convey at least 50% of the pipe flow. The minor system will consist of a piped drainage system which can accommodate the 5% AEP (1 in 20 year ARI). The piped system will convey all stormwater runoff up to and including the 5% AEP. The major system will cater for storms up to and including the 1% AEP via overland flow such as roads and open channels, to safely convey excess run-off from the site.

The following mitigation measures will be implemented during the construction stage to manage erosion and sediment control:

- Sediment basins have been sized (based on 5 day, 85th percentile rainfall) and located to ensure sediment concentrations in site runoff are within acceptable limits.

- Sediment fences are located around the perimeter of the site to ensure no untreated runoff leaves the site. They have also been located around the existing drainage channels to minimise sediment migration into waterways and sediment basins and around the proposed stockpiles.
- A stabilised site access is proposed at the entry to the eastern works area via the Great Western Highway and the western works area via Flushcombe Road. This will limit the risk of sediment being transported onto Flushcombe Road, Great Western Highway and other public roads.
- Minimising the extent of disturbed areas across the site at any one time.
- Progressive stabilisation of disturbed areas or previously completed earthworks to suit the proposal once trimming works are complete.
- Regular monitoring and implementation of remedial works to maintain the efficiency of all controls.

6.2.6. Flooding Risk

A Flood Risk Assessment has been included in the Civil Engineering Report prepared by Costin Roe and is provided at **Appendix V**. The Flood Risk assessment has been prepared having regard to the following flood planning documentation:

- Hyder (2010) – Flood Study and Stormwater Management – Huntingwood East Precinct, Blacktown (document ref: DN00214)
- Blacktown City Council's WSUD developer handbook (2020)

Blacktown Creek is located on the eastern part of the site. A drainage swale from controlled stormwater discharge basins from the Western Motorway (flowing to the north under the Great Western Highway) is located on the western part of the site. This swale is not a mapped watercourse as confirmed with correspondence from NRAR.

An upstream catchment from the opposite side of the M4 Motorway discharges through three sets of headwalls and pipes, two into Blacktown Creek and one into the drainage swale, discharging through a set of pipes underneath the Great Western Highway. Blacktown Creek discharges into another riparian corridor adjacent to residential properties, and the drainage swale discharges as overland flow through residential properties. Realignment of Blacktown Creek and the drainage swale is proposed to accommodate the proposal and avoid upstream or downstream impacts.

The outcomes of the two-dimensional flood model (**TUFLOW**) The assessment shows a reduction in post development 1% AEP flood levels, hence meeting impact requirements. The assessment shows the proposed building achieves flood planning and freeboard requirements as follows:

Table 21 Floor Planning Level Comparison

Warehouse	Flood Planning Level (FPL)	Proposed FFL
Warehouse 1	RL69.00m	RL73.31m
Warehouse 2	RL72.00m	RL76.00m
Warehouse 3	RL72.00m	RL78.10m
Warehouse 4	RL74.35m	RL78.10m
Warehouse 5	RL76.50m	RL85.30m

Source: Costin Roe Consulting

In relation to flood impact on the development or impact from the development on flooding, it is noted that the modelled 1% AEP flood extent does not encroach the subject property, hence no adverse impact to existing flood conditions or surrounding developments are associated with the proposed development. As noted, that the majority of the site is not impacted by the regional Probably Maximum Flood (**PMF**) flood event, except for Building 1's hardstand being noted as Hazard Category H1.

Having regard to the flood risk assessment, a plan of action should include an on-site response plan that addresses what measures should be undertaken once the threat of a flood is determined to be imminent. A flood evacuation strategy should also be included so that all persons within the precinct are familiar with the processes required if a flood occurs.

6.2.7. Hazards and Risks

Dangerous Goods (**DGs**) or hazardous materials, such as liquefied petroleum gas (**LPG**) tanks or flammable liquid storage, are not proposed as part of this SSDA. As such a preliminary hazard analysis of the proposed development is not required for this application.

Where a specific warehouse tenancy requires DGs or hazardous material storage, a separate DA obtaining approval under Chapter 3 of the R&H SEPP will be required.

6.2.8. Contamination and Remediation

The following reports have been prepared which assess the suitability of the site to accommodate the proposed development having regard to the historic uses and potential for contamination:

- Detailed Site Investigation (**DSI**), prepared by JBS&G – Refer to **Appendix W**
- Remediation Action Plan (**RAP**), prepared by JBS&G – Refer to **Appendix X**
- Long Term Environmental Management Plan (**LTEMP**), prepared by JBS&G – Refer to **Appendix Y**

The DSI confirmed the previous uses for the site include rural, residential, agricultural, grazing / market gardens, depots, poultry operations and car scrap yards / mechanics. The site currently comprises predominantly vacant land with dense grass cover. The western part of the site includes a mechanic truck depot and storage yard, with four abandoned residential houses, various stockpiles, Underground Storage Tanks (**USTs**), Aboveground Storage Tanks (**ASTs**) and asbestos fragments across the grounds surface.

JBS&G identified the following site conditions during their site investigations in 2021 and 2022:

- Bonded Asbestos Containing Material (**ACM**) were identified in Stockpile 2 in the western portion of the site with impacts identified on the ground surface of the surrounding area, specifically around the former buildings and all stockpile material.
- Friable asbestos exceeding health criteria was reported within several disturbed soil samples, all within the western portion of the site.
- Friable and bonded asbestos was reported within Stockpile 5 with an approximate volume of 260m³. The stockpile has significant quantities of building and demolition wastes including ACM.
- Trace chrysotile asbestos was reported in disturbed soil and Borehole 24.
- ACM is likely to be present on the ground surfaces / stockpiled soils at the site, noting the long grass cover / vegetation precluded a thorough inspection of the ground surface. A thorough ground surface inspection is to be completed during vegetation removal to avoid cross-contamination of asbestos / non-asbestos impacted soils in subsequent earthworks. Any materials identified to contain building and demolition wastes should be isolated for further investigation given the inherent higher risk of identifying asbestos within the materials.
- The asbestos impacted stockpiles and hotspots will require to be contained on-site under a marker and capping layer (that comprises 0.5 m of clean capping material and/or hardstand) and managed on-site through the preparation/implementation of an Asbestos Register and Asbestos Management Plan (**AMP**). Alternatively, impacted materials can be disposed off-site to a licensed facility.
- Total Recoverable Hydrocarbons (**TRH**) at the surface sample location in the two western lots exceed management limits and ecological criteria and is located within stained and odorous soils in the vicinity of 200 litre drums. These locations will require remediation and/or management.
- Zinc and Polycyclic Aromatic Hydrocarbons (**PAH**) within both stockpile and in-situ soil samples will not pose unacceptable risks.
- Groundwater on the site reported slightly elevated metal levels, however, concentrations reflect urban background conditions, noting there was no significant change between up and down gradient monitoring wells and no significant source material identified within site soils. A slightly elevated level of ammonia

was considered reflective of the site historically within an agricultural area and was not significant enough to require remediation and/or further investigation.

- Soil-vapour was found to be generally absent of detectable concentrations of TRHs and/or VOCs and below the adopted criteria. Whilst sources of potential volatile contaminant impact were identified within the USTs, direct sampling of soil-vapour immediately below existing concrete slabs indicated that sub-surface gas was free from volatile constituents at concentrations which represented potential risks to future receptors.

Overall, it is considered that the site is suitable for the proposed commercial and industrial land uses, subject to appropriate remediations and / or management of the identified soil impacts.

The DSI recommended the preparation of a RAP and an AMP to manage potential risks consistent with work health and safety regulations. JBS&G have confirmed that the required remediation is Category 2 remediation work which does not require development consent to be obtained. On this basis, the remediation works do not form part of the SSDA. The applicant will undertake the remediation work once the demolition works have been completed in accordance with the CDC. The remediation works required under the RAP are included below and will ensure the site is suitable for the proposed development:

- Removal of bonded ACM impacted ground surfaces.
- Removal of bonded ACM impacted stockpile or fill material and anthropogenic waste.
- Removal of impacted fill, specifically health metals and PAHs.
- Removal of impacted UPSS / UTSs and associated impacted soils.
- Excavation of hydrocarbon-stained soils and associated impacts.
- Bioremediation.

Onsite containment will be required to manage impacted fill and physically separate it to mitigate inhalation of airborne asbestos fibres. This would involve:

- A minimum soil cover thickness of 0.5m in landscaped or mass planting/shallow landscaped areas and 1.5m in tree pit zones which is underlain by a visual marker land in unpaved areas.
- Permanent concrete floor/ground slabs as underlain by a visual marker.
- Top (concrete) of pile foundations.

This on-site containment of contaminated soils is expected to take place on the western part of the site (Lots 2 and 3 in the proposed subdivision). The final selected area will be monitored and managed under the LTEMP. The LTEMP will manage environmentally impacted soils to facilitate continued protection of human health for future site works, occupiers, visitors, and contractors engaged to undertake works onsite. Where changes in the legislation occur, the LTEMP should be updated by a suitably qualified Environmental Consultant or Occupational Hygienist to reflect these changes.

6.2.9. Waste Management

A Waste Management Plan (**WMP**) has been prepared by JBS&G and is provided at **Appendix Z**. The WMP identifies all potential waste likely to be generated by the proposed development during the construction and operational phases, including descriptions on how waste is to be handled, processed, disposed of or re-used and recycled.

The WMP has been prepared in accordance with the requirements of the *NSW Waste Avoidance and Resource Recovery Act 2001* and the *NSW Protection of the Environment Operations Act 1997* as well as Part G of Blacktown Development Control Plan 2015 (as referred to in HDGP 2011).

As identified previously, demolition of the existing structures on site will be undertaken via CDC. On this basis, waste associated with the demolition of the buildings has not been considered as part of the WMP.

6.2.9.1. Construction Waste

The approximate volume of waste to be generated during the construction phase of the project are provided in the table below.

Table 22 Estimated Waste Generation - Construction

Waste to be generated	Estimated volume – generation
Hard material	5,364m ³
Timber	4,023m ³
Plastics	2,514m ³
Cement Sheet	1,509m ³
Gypsum Material	1,006m ³
Metals	1,006m ³
Paper / Card	670m ³
Vegetation	503m ³
Soil	168m ³
Total	16,762m ³

Source: JBS&G

A final WMP or waste component of a Construction Environmental Management Plan will be developed by the appointed contractor prior to the development of the site. In the meantime, site specific waste management measures have been developed for the construction of the proposed development. These include:

Avoidance and reduction of waste

Opportunities to do this during construction include development of a procurement policy which considered waste avoidance measures, refine waste stream estimates to ensure adequate onsite storage and segregation and refined estimated volume of materials for construction.

Reuse and recycling

Methods to implement this include incorporation of waste management into development staging, ensure waste segregation area is easily accessible, ensure contractors are familiar with onsite waste storage areas, and consider opportunities for material reuse in areas in proximity to the site.

Treatment and disposal

To manage the treatment and disposal of waste during construction, ensure wastes which cannot be reused or recycled are clearly segregated, provide separate bins for subcontractors to dispose of various construction wastes, and induct contractors and staff into site waste management practices.

6.2.9.2. Operational Waste

The following table details the waste generation and storage requirements during operation of the facility.

Table 23 Estimated Operational

Warehouse Tenancy	Area (m ²)	Waste Generated (L per week)	Number of Bins	Space Required (m ²)
Warehouse 1	5,935	16,618	5	9.2
Warehouse 2	12,031	33,687	8	14.7
Warehouse 3A	12,186	34,121	8	14.7
Warehouse 3B	10,214	28,599	7	12.9
Warehouse 4A	9,576	26,813	7	12.9
Warehouse 4B	9,571	26,799	7	12.9
Warehouse 4C	10,319	28,893	7	12.9
Warehouse 5A	9,951	27,863	7	12.9
Warehouse 5B	7,893	22,100	6	11.1
Warehouse 5C	7,329	20,521	5	9.2
Warehouse 5D	7,736	21,661	5	9.2
Warehouse 5E	9,926	27,793	7	12.9
Warehouse 5F	7,839	21,949	5	9.2
Warehouse 5G	7,306	20,457	5	9.2
Warehouse 5H	6,753	18,908	5	9.2

Source: JBS&G

Warehouse waste will be stored in 600 litre general waste and recycling bins, located in the waste storage areas closest to the subject tenancy. Small residual waste and recycling receptable will be provided within the ancillary offices. Office waste will be collected by cleaning staff and disposed in the 660 litre bins located in the dedicated waste storage area for each warehouse.

Waste storage areas are located within the truck hardstand areas, enabling direct and convenient access for waste collection vehicles. Vehicles will enter the site from the designated truck access point, either from Augusta Street for Warehouses 1-4 or Great Western Highway for Warehouse 5. Waste vehicles will enter and exit the site in a forward direction and would not be required to reverse in order to manoeuvre within the site.

6.2.10. Aboriginal Cultural Heritage

An Aboriginal Cultural Heritage Assessment (**ACHAR**) has been prepared by Coast History and Heritage and is provided at **Appendix AA**. The ACHAR documents the Aboriginal archaeological assessment in accordance with the following regulation:

- *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW (OEH 2011),*
- *Heritage NSW Code of practice for Archaeological Objectives in New South Wales (DECCW 2010),*

- *Part 6 of the National Parks and Wildlife Act 1974, and*
- *National Parks and Wildlife Regulation 2019.*

The ACHAR has assessed the Aboriginal cultural values of the site and the potential impacts of the proposed development via consultation with Registered Aboriginal Parties via public and direct notices, acknowledging the statutory responsibilities of Local Aboriginal Land Councils (**LALCs**) to promote protection of Aboriginal culture and heritage of Aboriginal persons within their boundaries.

Deerubbin LALC were notified as part of the consultation period during the ACHAR. Other Registered Aboriginal Parties of note include:

- Corroboree Aboriginal Corporation
- Darug Custodian Aboriginal Corporation
- Kamilaroi Yankuntjatjara Working Group
- Mundawari Heritage Consultants
- Murra Bidgee Mullangari Aboriginal Corporation
- Muragadi Heritage Indigenous Corporation

Matters of significance from the consultation considered during the ACHAR assessment include:

- Darug descendants have visited, worked and lived in the Huntingwood area. They have been involved in Aboriginal cultural heritage management and archaeology for many years.
- The importance of the natural resources that would have been available along Blacktown Creek and the wider area would have encouraged camping and social connections.

Site investigations and surveys were undertaken to assess the potential presence of Aboriginal sites onsite. An Aboriginal Heritage Information Management System (**AHIMS**) search was undertaken for the revealed that there are currently two Aboriginal sites are registered within the site area, #45-5-2361 (Artefact) in the southwestern portion of the site and #45-5-3308 (Artefact) in the southeastern portion of the site.

Previous assessments have noted the disturbed conditions of the land and lack of surviving topsoil deposits. This is confirmed by the survey results of the ACHAR which did not result in the identification of any unrecorded Aboriginal sites or areas.

Neither AHIMS site was able to be located during the site survey. #45-5-2361 could not be accessed but was pinpointed based on previous investigations. The site location of #45-5-3308 was found, however, the artefact may have been washed down from its exposed sloping location to the nearby drainage line since its record date.

The anticipated impact of the proposed development on these two items of archaeological heritage are as follows:

- **AHIMS #45-5-3308:** The item has not been sighted since it was recorded. Even if found, it cannot be preserved in its original location and is not associated with any subsurface archaeological deposit. Any Aboriginal value is tied to the artefact, not the site, and accordingly, is not a reason to preserve the context or location.
- **AHIMS #45-5-2361:** This item is located in an electrical easement and is unlikely to be impacted by the proposed development. Further consideration is given to the protection of this item (if it still exists) in the recommended mitigation measures (and the architectural drawings lodged with the SSDA) as outlined below.

Mitigation measures to preserve the existing archaeological and Aboriginal cultural heritage of the site include the following:

- Temporary fencing around the site #45-5-2361 be included in all construction and management plans for the area to ensure that future impacts are avoided.
- Consideration should be given to the development of a cultural interpretation plan.

- An unexpected finds protocol should be implemented for the life of the development. The unexpected finds protocol should be adhered to if unforeseen Aboriginal objects of human remains are uncovered during the development. If any Aboriginal objects or bones suspected of being human are identified during construction, site workers must:
 - Not further disturb or move these remains.
 - Immediately cease all work at the location.
 - In the case of suspected human remains only, notify NSW Police. In the case of Aboriginal objects, notify the Heritage NSW Environment Line on 131 555 as soon as practicable and provide available details of the objects or remains and their location. Management options will be determined in consultation with the Registered Aboriginal Parties to this project.
 - Not recommence any work at the location unless authorised in writing by Heritage NSW.
- A copy of this report should be forwarded to the Registered Aboriginal Parties and to:
 - The Registrar, Aboriginal Heritage Information Management System, Heritage NSW
 Locked Bag 5020
 Parramatta NSW 2220

6.2.11. Environmental Heritage

A Heritage Impact Statement (**HIS**) has been prepared by Coast History and Heritage to assess the potential heritage impact of the proposed development and is provided at **Appendix BB**.

The site is not a listed heritage item and is not within a heritage conservation area under Chapter 2 of the I&E SEPP. However, it is within proximity of five heritage items and accordingly, an assessment of potential impacts is required with the SSDA. It is noted that no archaeological resources were identified onsite beyond those of Aboriginal cultural heritage significance identified and assessed under the ACHAR. The HIS was prepared in line with the following legislation and policies:

- *Heritage Act 1977*;
- *Environment Protection and Biodiversity Conservation Act 1999*;
- *Environmental Planning and Assessment Act 1979*; and
- Huntingwood Precinct Development Control Plan 2011.

There are five listed heritage items within proximity of the site as listed below. The HIS confirms there will be no impacts to the heritage significance of four of the listed items, with further detailed consideration given to the extent of the potential impacts to the fifth item (Refer to **Figure 30**):

- Former Great Western Road, Prospect (not impacted)
- Former Police Residence / house (not impacted)
- Royal Crickets Arms Inn (not impacted)
- Seven Milestones (not impacted)
- St Bartholomew's Church and Cemetery

Figure 30 – Surrounding Heritage Items



Source: Coast History and Heritage

St Bartholomew's Church and Cemetery is a State listed heritage item (State Heritage Register No. 00037). The Church's location on a significant rise has historically made the item a dominant feature in the landscape since its construction in 1841. The surrounding area has undergone significant change in the period since initial construction, with the realignment of the Great Western Highway, construction of electricity transmission lines, construction of the Prospect Highway and Western Motorway. While the church still dominates from its siting, the change in context, increase in vegetation west of the church, and development of the church reinforce an ongoing shift east in the setting of and views from the Church and Cemetery. The Conservation Management Plan and masterplan prepared for the church conclude the landmark quality of the Church is what makes it significant, however, previous changes in the surrounding area have resulted in the key sightlines and focus shifting to the east.

The assessment notes the Warehouse 5 building is set on a lower lying ground, setback to the eastern boundary, with planting proposed for the eastern boundary to screen the proposed building. However, the proposed development will dominate the western outlook of the Church as outlined in the visual impact assessment (Refer to **Figure 16**) and needs to be further considered having regard to the impacts on the heritage significance of the church and its context. The HIS concludes:

The development will involve construction across an area that has been identified as forming part of the setting of the Church, and will affect views to the west from the Church property. Overall, it will tend to continue a process that has resulted in the focus of the setting of the Church shifting to the east, and in the main views to the Church being from the east.

Based on the above, the proposed development is considered acceptable subject to implementation of the recommended measures to mitigate any impacts to heritage during the ongoing development of the site:

- Prior to commencement
 - An archival photographic record should be made of the study area so far as it forms part of the setting of St Bartholomew's Church and Cemetery, including views from the heritage listed property towards the west.
 - In planting screening trees along the eastern boundary of the study area, care should be taken to avoid unnecessary impact on the views from St Bartholomew's Church towards the west.

- During the works
 - If any unexpected historical archaeological relics or potential relics are unearthed during the course of the development, work should cease in the vicinity, and Heritage NSW should be contacted for advice. It may be necessary to redesign the works to avoid impact to relics.
- Following completion of the works
 - A copy of the archival record should be lodged with the Heritage NSW Library and with Blacktown City Library.
 - The screening planting along the eastern boundary of the study area should be maintained during operation of the facility, and no changes should be made that may result in additional impact to St Bartholomew's Church and Cemetery.
- A copy of this report should be forwarded to the Heritage NSW Library, and to the Blacktown City Library.

6.2.12. Social Impact

A Social Impact Statement (SIA) has been prepared by Urbis and is provided at **Appendix CC**. The SIA identifies and analyses the potential social impacts associated with the proposed development and provides further recommendations to lessen negative social impact where required. The SIA has been prepared in accordance with the *Social Impact Assessment Guidelines for State Significant Projects* (2023).

Positive Impacts

- Provision of health and wellbeing benefits to workers:
 - The proposed onsite worker amenities and spaces will support the health and wellbeing of future employees, including indoor lunchrooms and covered breakout areas. High quality landscaped areas are also proposed for the site with boardwalks provided along the western swale and Blacktown Creek. This benefit produces a **high** impact.
- Increase local employment opportunities:
 - The proposed development is anticipated to generate 651 jobs during the construction stage and 908 full time jobs during operation. Further with the public transport opportunities afforded to the proposed development in concert with the GTP, benefits would have a **very high** beneficial impact.

Low to Medium Impacts

- Traffic impacts relating to congestion:
 - Construction of the proposed development will increase traffic on the surrounding road network. Provided the list of mitigation measures from the TAIA including road upgrades, provision of a GTP and CTMP, the proposal will have a **low** impact.
- Impacts on local character and heritage:
 - The view impact to the St Bartholomew's Church and Cemetery has been assessed from a heritage impact and view impact perspective. As detailed in the HIS and VIA, provided the implementation of the mitigation measures, the mitigated impact of the proposed development on the local character and heritage of the context will be **medium**.
- Potential disturbance to site of Aboriginal significance:
 - The ACHAR identified two previously recorded Aboriginal archaeological sites, however, neither could be located during field studies and no further sites were identified. Given the substantially impacted nature of the site, the site does not have a high potential to contain intact Aboriginal archaeological remains. Provided that mitigation measures noted in the ACHAR are implemented, the mitigated impact of the development is assessed as **low**.
- Impacts related to air quality:
 - Emissions such as dust and other particulate matter resulting from demolition of existing structure, heavy equipment and from motor vehicles were identified as key emissions during the construction phase. During operation, emissions from fuel combustion and particulate matter associated with trucks and other vehicles entering and leaving the site are anticipated to be the contributors to air

quality impact. Subject to implementing the mitigation measures in the AQIA, the proposal is assessed to have a **low** social impact.

- Exacerbation of urban heat:
 - Urban heat island is viewed as a significant issue for the Blacktown area. The proposal will increase hardstand over existing grassland area. To mitigate the potential for increase urban heat onsite, the proposal will include:
 - Retention of the Blacktown Creek riparian corridor
 - Provision of 16.23% tree canopy coverage
 - Soft landscaping where paving or hardstand is not required
 - Inclusion of Photovoltaic panels on the roofs of the warehouses, with indicative layouts shown on the plans.
 - The mitigated impact of urban heat island is, therefore, viewed as **medium**.
- Amenity impacts relating to noise:
 - The proposal will operate 24 hours a day, seven days a week. Noise can impact on peoples' health and wellbeing due to sleep disturbances that affect peoples' ability to concentrate when undertaking activities, such as working or studying.
 - Implementation of a CNVMP and operational interventions such as the landscaped mound and 3m noise walls along the northern boundary will reduce impacts to surrounding residential receivers.
 - The NVIA indicates the operational impacts generally comply with the PNTLs, except for residences north of the site at Brae Street and Desley Crescent which is expected to exceed the PNTLs by 1 dB(A). However, the proposed operational noise impact from infrequent use of truck airbrakes at the development site is anticipated to be lower than the existing maximum noise levels from vehicles on the Great Western Highway. As such, the mitigated noise impacts are anticipated to be **medium**.
- Amenity impacts relating to visual change:
 - The proposal will introduce new built form to the site. Visual change in relation to the local and wider visual context has potential to impact an individual or groups sense of place. This can include changes to outlook, lighting spill and sense of character. The Design Report and VIA confirm the proposal includes landscape treatment/setbacks and a considered building design to mitigate visual impact. The mitigated impact is assessed to be **low**.
- Potential exacerbation of flooding:
 - As detailed in the WCMS in the Civil Report, the realignment of the watercourses will mitigate flooding impacts, with best practice stormwater quality management systems being implemented across the site. Overall, the recommended water quality and quantity mitigation measures for the proposed development will ensure a **low** impact from the site.
- Uncertainty around change to property values:
 - The construction and operation of new urban developments can contribute to feelings of uncertainty or anxiety among residents in relation to changes to their property values. A range of mitigation measures will minimise the potential social, environmental and economic impacts associated with the proposed development. Given the implementation of these measures, the mitigated impact to resident's anxiety around property value is **low**.
- Community unrest regarding consultation
 - Some residents appeared to be disengaged with the engagement process with concerns regarding whether their feedback would be addressed as part of the planning and design process. Some residents were experiencing consultation fatigue from multiple engagement processes. The unmitigated impact is assessed as **medium**. It is recommended that an engagement plan and complaints management system be implemented for the proposed development prior to construction.

Overall, the SIA views the cumulative social impact of the proposed development to have a **medium** impact the local community and other identified stakeholders within the area of social influence, provided incorporation of the nominated mitigation measures.

The following additional recommendations are provided to further manage the potential impacts from the proposal:

- Undertake regular cleaning and maintenance of the outdoor staff breakout spaces and open space areas to ensure they are attractive, inviting, and safe.
- As the future warehouse tenants and exact operational procedures occurring at the site are not known, consider additional air quality monitoring when confirmed to ensure there are no unanticipated air quality impacts on surrounding sensitive receivers.
- Provide regular communication updates to nearby sensitive receivers, particularly the residents north of the site, to notify them of any significant air quality impacts during construction.
- Future warehouse tenants should consider developing an employment strategy including strategies to assist with young people disengaged with education or employment. This could include establishing connections with local TAFEs, colleges or youth-focused not for profit organisations.
- Future warehouse tenants should promote public transport access to encourage a broader range of people to apply for roles, particularly people who cannot drive or have access to a car.
- Prepare an engagement plan prior to construction which identifies the likely impacted stakeholders and the engagement activities that will be undertaken. Engagement should involve clear messaging and communications regarding multiple issues should be consolidated to avoid consultation fatigue.
- Implement a complaints management system prior to construction to provide opportunities for residents and other stakeholders to express concerns. All complaints should be recorded, and appropriate response measures should be detailed and actioned.
- Any future construction management plan should consider cumulative impacts associated with the proposed development and surrounding developments, such as the Prospect Highway upgrade.

6.2.13. Infrastructure Requirements and Utilities

A Service Infrastructure Assessment for the proposed development has been prepared by the Land Partners and is provided at **Appendix DD**.

The existing site infrastructure and the required upgrades are summarised in the following table. Upgrades are required to potable water, and electricity to support the proposed development. All required services will be delivered through the service utility asset creation pathways and funded by the applicant. The required infrastructure will be coordinated with the project team to ensure the assets are constructed and commissioned prior to issuance of Occupation Certificate.

Table 24 Existing and Proposed Infrastructure

Infrastructure	Availability / Upgrades Required
Potable Water	The site is currently serviced by a 500mm trunk water main along Flushcombe Road. This connects to the site via a 100mm domestic reticulation main along Augusta Street. The reticulation main along Augusta Street requires upsizing to a 150mm / 200mm water main and reconnecting to the 100mm that traverses under the Great Western Highway to service the entire site.
Wastewater	The site comprises two wastewater catchments. These include a new wastewater reticulation main for the western portion of the site and an existing wastewater system for the eastern portion.

Infrastructure	Availability / Upgrades Required
Electricity	The proposed development will require approximately 4.3MVA of electricity to operate. A high voltage feeder will need to be laid from the Arndell park Zone Substation to the site. The applicant has engaged Edgewater Consulting to consult with the electrical provider for the site, Endeavour Energy, regarding the infrastructure requirements. Endeavour Energy have confirmed that an 11kv feeder will service the site, providing 5.5MVA capacity. To interconnect the warehouse buildings to the feeder, Endeavour Energy have confirmed that four 1,000kVa pad mount substations will be required to service each building. These have been incorporated into the architectural plan set and will be subject of ongoing consultation with Endeavour Energy to ensure proper connection to the existing electrical infrastructure. The 132kv transmission lines along the southern boundary have been addressed in the master planning of the site with no development taking place within the electrical easement area.
Gas	No gas reticulation is required to service the proposed development.
Telecommunications	Fibre-optic reticulation exists within Flushcombe Road which connects to the systems within the Great Western Highway. No amplification or upgrades is expected for the proposed development.

6.2.14. Bush Fire Risk

A Bushfire Protection Assessment (**BPA**) has been prepared for the proposed development by EcoLogical and is provided at **Appendix EE**. The northeastern portion of the site has been identified as a Vegetation Buffer zone within bushfire prone area.

The BPA assesses the proposed development against the specific objectives of industrial and commercial buildings with regard to Asset Protection Zones (**APZs**), access, water supplies, electricity services, gas services, construction standards, and landscaping. An APZ has been established for the site in-line with the BPA's assessment of the site and the proposed development as shown in the figure on the following page.

The proposed development has implemented the following design interventions to mitigate potential bushfire impacts:

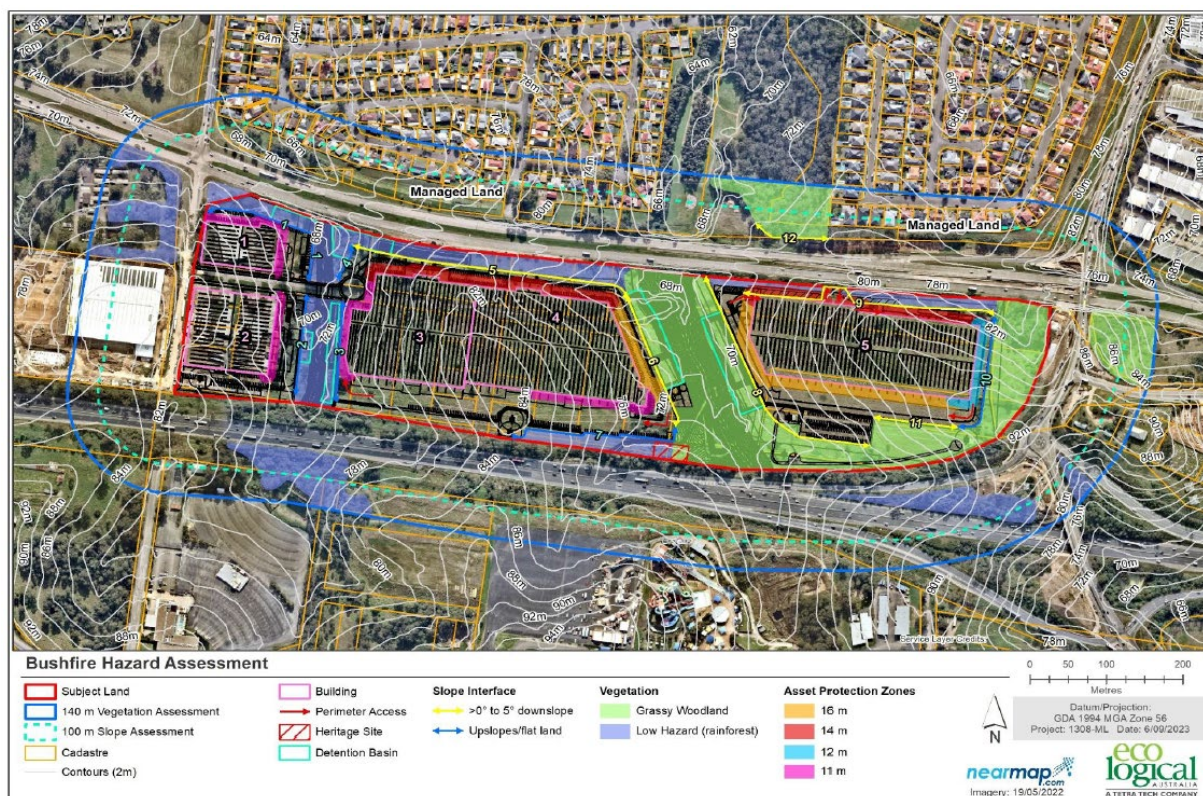
- Perimeter access is provided around each of the warehouse buildings linking to the public road networks for safe evacuation routes for future occupants.
- The defendable space has been provided for all buildings, with additional width accommodated within the car parking area.
- The provision of an APZ and perimeter access allows fire truck access emergency service personal operational area to prevent fire spread.
- The proposed warehouse and office buildings will be serviced by hydrants and internal sprinkler systems. Further, electrical and water services are grounded and will not be impacted by a potential bushfire.
- Ember protection measures, such as the sealing of roof/wall junctions with aluminium, steel and bronze mesh as well as the screening of all windows with such a mesh, will be implemented based on the requirements of AS3959.
- The landscape plan for the site provides clear area of low-cut lawn or pavement adjacent to the warehouse buildings, and has adequately located trees and shrubs such that:

- Tree branches will not overhang the roof.
- Tree canopy is not continuous.

Given the maximum Bushfire Attack Level (**BAL**) applicable to the site is BAL-29, the proposed development is able to comply with the relevant bushfire protection solutions via a performance solutions. The design implications will form part of the detailed design process in the post approval phase.

Further an emergency plan meeting the requirements of the Work Health Safety Regulation 2017 and any other relevant legislation will be prepared prior to Occupation Certificate.

Figure 31 – Bushfire Hazard Assessment



Source: Eco Logical

6.2.15. Contributions and Public Benefit

The site is not affected by a Section 7.11 or Section 7.12 Contribution Plan. Consultation is ongoing with Blacktown City Council regarding the preparation of a Planning Agreement which could include the delivery of the following infrastructure upgrades:

- Upgrades to local road network, including delivery of half-road construction and completion of the cul-de-sac bulb in Augusta Street.
- Stormwater and riparian works along Blacktown Creek and the western swale to improve the management of stormwater from upstream.
- Landscaping and bush regeneration works, including land downstream along Blacktown Creek and north of the Great Western Highway.

Due diligence investigations undertaken by LOGOS to inform the purchase of the site confirmed the site may benefit from a TICD which applies a contribution rate of \$75,500 per hectare of net developable area. This rate would be subject to indexation at the time of payment. The balance of the site would need to satisfy the current rate for the regional road/transport infrastructure requirements to satisfy the provisions under the I&E SEPP.

7. Justification of the Project

This section of the report provides a comprehensive evaluation of the project 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 development, 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 proposed development will achieve the project objectives through the delivery of a best-in-class industrial warehouse and distribution precinct that capitalises on its interconnected location with the surrounding motorway infrastructure and responds to market demand and tenant requirements for warehouse and distribution facilities.

The final design has been resolved to minimise potential impacts of the development on the environmental condition of the site and the amenity of the surrounding locality. The layout minimises impact to the biodiversity values of the site, with significant works to enhance the riparian and landscape buffer zones associated with Blacktown Creek and the western drainage swale. The visual, built form and acoustic impacts have been assessed in detail, having specific regard to the residential receptors north of the site

7.2. Strategic Context

The proposal aligns 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 651 jobs during construction and 908 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 listed in **Section 4** and assessed in **Appendix B**. 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 B**.
- This EIS has been prepared in accordance with the SEARs as required by Schedule 2 of the EP&A Regulation.
- Consideration is given to the relevant matters for consideration as required under the BC Act and the SSD is supported by a BDAR.
- This SSDA pathway has been undertaken in accordance with the Planning Systems SEPP as the proposed development is classified as SSD.
- Concurrence from TfNSW will be required as per the T&I SEPP for 'traffic generating development'.
- The proposal complies with all of the relevant provisions under Chapter 2 of the I&E SEPP as detailed in **Appendix B**. The proposed development is consistent with the objectives of the IN1 General Industrial zone.
- The proposed development has been assessed in accordance with the R&H SEPP and the development complies with the relevant clauses.
- The proposal generally accords with the relevant provisions of the HDCP 2011 as outlined in **Appendix B**.

7.4. Community Views

Community and stakeholder engagement has been undertaken by the applicant and Urbis in the preparation of the SSDA. This includes direct engagement and consultation with:

- Government, agency and utility stakeholders as listed within the SEARs, including TfNSW regarding the connection of the site to the new Prospect Highway intersection and Blacktown City Council regarding the design principles and responding to community feedback.
- Registered Aboriginal Parties, including the Deerubbin Local Aboriginal Land Council and Darug Custodian Aboriginal Corporation.
- Surrounding landowners, Friends of St Bartholomew's, businesses and community members.

This engagement was consistent with the community participation objectives in the Undertaking Engagement Guidelines for State Significant Projects and complied with the community engagement requirements. Feedback obtained from Government agencies, utility stakeholders and the local community have been incorporated into the design and assessment in the EIS.

In accordance with the Regulations, the EIS will be placed on formal public exhibition once DPIE has reviewed the EIS and deemed it 'adequate' for this purpose. Following this exhibition period, the Applicant will respond to any matters raised by notified parties.

7.5. Likely Impacts of the Proposal

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

- **Natural Environment:** the proposal addresses the principles of ecologically sustainable development (ESD) in accordance with the requirements at Clause 194 of 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.

The proposed development is committed to going beyond the minimum benchmark requirements for sustainability to the benefit of future generations such as targeting a 5 star Green Star Design & As Built v1.3 rating and the potential implementation of major solar PV array on the warehouse roofs.

- 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 design will address key elements such as energy, potable water, and material consumption to afford future generations ecological equality. This includes the management of rainwater and stormwater, with low flow water fixtures, drought resistant planting, and capturing rainwater for reuse onsite.

- Conservation of biological diversity and ecological integrity: The proposed development commits to planting native vegetation and implementing integrated landscaping to enhance the overall ecology and biodiversity of the site.
- 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 project will target a waste diversion target of 90% as well as develop specific project waste management strategy to ensure the proposed development pays for the waste and damage it creates.

Overall, the proposal will not have any unacceptable impacts on the natural environment. The ESD Report (Refer to **Appendix O**) identifies initiatives as well as practical direction for implementing the initiatives to promote environmentally responsible design in pursuit of a 5 star Green Star and other relevant accreditations.

- **Built Environment:** The proposal has been assessed in relation to the following key built environment impacts:
 - **Built Form:** The proposed development is compatible with the existing and future character of development in the Western Sydney Employment Area. It reflects the scale envisaged for the precinct while providing design interventions to screen the extent of the warehouse buildings and minimise its impacts on the residential development to the north. The proposal demonstrates best-in-class warehouse development with ample landscaped areas to enhance the built form and provide for visual screening.
 - **Visual Impacts:** 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, as highlighted in **Section 6.1.3**. The building design and landscape screening responds to the sensitive receptors, including the residential area and heritage listed church, with no unacceptable impacts pending implementation of recommended mitigation measures.
 - **Traffic and Accessibility:** Both the Flushcombe Road / Great Western Highway intersection as well as the proposed Prospect Highway / Great Western Highway intersection will continue to operate at an acceptable level of service with the proposed development's traffic generation, as set out in **Section 6.1.4** and the TAIA. Road upgrades required to mitigate any future traffic impacts to 2033 have been noted in **Appendix D** and will be incorporated in the Planning Agreement.
 - **Biodiversity:** The proposed development will deliver a total of 9.4 hectares of landscaped area. This includes riparian planting and landscape buffer zones to restore the Blacktown Creek 1st Order watercourse and enhance the identified conservation areas, off-setting the realignment of Blacktown Creek and the western swale. The landscape design will provide employee amenity, reduction in urban heat island effect and screening of the development to the surrounding areas. Eight biodiversity credits will be retired to offset the impacts to the biodiversity value of PCT 3319.
 - **Noise and Vibration:** A comprehensive assessment of the potential noise and vibration impacts has been undertaken for both the construction and operational phases of the development which confirms the proposal will not result in any significant adverse impacts. The recommended landscape mounding and acoustic walls along the northern setback will address the identified potential noise sources and respond to community feedback undertaken in the preparation of the proposal.
- **Social:** the proposal will result in a medium social impact, including the following key matters:
 - Increased employment opportunities during the construction and operational phases of the development for the surrounding Blacktown and Western Sydney areas.
 - The proposed development will provide amenities and spaces will support the health and wellbeing of future employees onsite, with facilities such as indoor lunchrooms and covered breakout areas.
 - Targeting a 5 Star green star rating, the proposed development has implements many ESD initiatives such as rainwater harvesting, introduction of drought resistant planting, and providing of PV solar panels.
 - Landscape retention and proposed planting will result in a canopy coverage for the site that reduces the impact of urban heat island effect onsite.
 - The transport outcomes for the site, including the implementation of a CTMP, GTP, and road upgrades overtime, will minimise the traffic impact on the surrounding road networks.
 - The landscape treatment, setbacks along each boundary, design interventions such as the acoustic mound and walls, as well as the iterated design of the proposed development results in optimised outcome for both the site and residents to the north.
- **Economic:** The proposed development has a significant positive economic impact through:
 - Facilitating the retention and optimal use of the existing employment lands supply.
 - Addressing the current shortage of industrial floorspace.
 - Meeting the growing demand for future warehousing and logistics floorspace in a highly suitable location.

- Creating 651 jobs during the construction phase and 908 full time jobs during operation of the industrial precinct.

The potential impacts can be mitigated, minimised or managed through the measures discussed in detail within **Section 6** and as summarised in **Appendix D** to this EIS.

7.6. Suitability of the Site

The suitability of the site has been assessed in detail in the preparation of this EIS. This includes a comprehensive assessment of its consistency with the relevant strategic land use and transport policies and level of compliance with the statutory planning controls that apply to the site and the proposed development.

Each of the planning and technical specialist assessments have been considered in assessing the suitability of the site to accommodate the warehouse and distribution centre. The site is considered highly suitable for the proposed development for the following reasons:

- The proposed land use is permissible in the IN1 General Industrial zone in accordance with the I&E SEPP.
- The proposal is 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 satisfactorily responds 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 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 are either negligible or can be mitigated, minimised or managed through the implementation of recommended actions.

7.7. Public Interest

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

- The proposal will provide up to 651 full time jobs during the construction phase, and up to 908 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 redevelopment of the site will deliver critically needed industrial floor space close to Western Sydney. The Project is fully funded and 'shovel ready' for commencement of construction as soon as possible in Q2 2024.
- The proposal incorporates comprehensive landscaping to present an attractive appearance when viewed from the surrounding road network, minimise the potential visual impacts from the residential properties and heritage-listed church and enhance biodiversity outcomes. A comprehensive assessment has been undertaken of the potential environmental impacts and it has been demonstrated that all matters can be satisfactorily mitigated, minimised or managed to avoid any unacceptable impacts.
- The proposal meets sustainability benchmarks and incorporates innovative elements to achieve an environmentally responsible design.
- It can be concluded that on balance, the benefits of the proposal outweigh any adverse impacts and as such, the development is in the public interest.

Having considered all relevant matters, we conclude that the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

Disclaimer

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