



Your ref: **SSD-36138263**
File no: MC-23-00005

12 April 2024

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

Recipient Delivery Shaun.williams@planning.nsw.gov.au.

Attention: Shaun Williams

Dear Mr Williams

**SSD-36138263 Augusta Street Warehouse and Distribution Centre –
Response to Submissions.**

Thank you for your correspondence dated 27 March 2024 requesting our advice for SSD-36138263 Augusta Street Warehouse and Distribution Centre which is a State Significant Development proposal under section 4.36 of the *Environmental Planning and Assessment Act 1979*.

The proposal has been reviewed by our officers and we hereby object to the proposal until the matters referred to in the attachment are addressed.

If you would like to discuss this matter further, please contact me directly on 9839 6228.

Yours faithfully

Judith Portelli
Manager Development Assessment

Connect - Create - Celebrate

Council Chambers - 62 Flushcombe Road - Blacktown NSW 2148

Telephone: (02) 9839 6000 - DX 8117 Blacktown

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

Blacktown Council's submission to SSD-36138263

Augusta Street Warehouse and Distribution Centre

Planning matters

1. Provide accessible parking spaces for Warehouse 2 close to the Office space.
2. Turf cell permeable paving is to be provided for the entire extent of the parking area for Warehouse 2 which is within the transmission easement to maintain compliance with the requirements of the Pre-Application Meeting. Additionally, turf cell permeable paving is also to be provided for the southern carpark located below Warehouses 5A to 5H as this is also located within the transmission easement.
3. Whilst it is acknowledged that some consideration has been given in providing a material with a lower solar absorptance, the change from 'Monument' (0.73 absorptance) to 'Woodland Grey' (0.70 absorptance) represents a marginal improvement. Given the context of the site within Western Sydney, it is recommended that coloured sheeting with a lower solar absorptance rate such as Windspray (0.60 solar absorptance) or Bluegum (0.57 solar absorptance) be used for this development.

Environmental Health Matters

4. The comments provided in Council's previous objection dated 17 November 2023 have not been satisfactorily addressed.
5. On-site containment is expected to be inside lots 2 and 3, however the RAP does not specify the exact proposed location. This information must be clarified and confirmed for Council's information.
6. The Long-term Environmental Management Plan (LTEMP) was still submitted as a draft document and is to be finalised. This document does not confirm the location of proposed on-site containment. The final LTEMP is to be provided for Council's review.
7. The Noise and Vibration Impact Assessment has not clarified why noise monitor (L01) was not placed near the closest "moderately affected" sensitive receiver (R04). There was no reason provided for why this monitor was set ~35m further back from R04 **This must be clarified for our due diligence.**

Biodiversity Matters

8. Recommendation of in-kind biodiversity works with Council outside of the Lot are not supported by Council and must not contribute to any reduction in biodiversity offset credit calculation for the impacts of the proposal. The in-kind works recommended in the BDAR and Mitigation Measures Report by Urbis are already underway or planned and it would complicate things to try and work with the
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developer on these matters in this instance. The landowner may separately seek to enter into biodiversity improvement works outside of their Lot, however this will not form part of the current proposal or be used as credit offset or mitigation measures for the impacts of this proposal.

9. The Huntingwood DCP stipulates that all DAs within the precinct are inclusive of a mechanism for enduring protection and maintenance of conservation areas and riparian corridors under private ownership. There is no current reference in the VMP dated 25th March 2024 to enduring protection and maintenance via in perpetuity management. This needs to be made explicit in the VMP.
10. The Vegetation Management Plan by Clements and Associates dated 25th March 2024 needs amendment to include:
 - The timeline/ schedule of activities and location of conservation areas A, B and C referred to throughout the report should be clear to locate within the main body of the report. These are the main parts of the plan for a project manager to be able to pick up and implement and currently they are hard to discern from a lot of background and supporting information;
 - clear lists of recommended species for planting into each conservation area/zone (those in the landscape plan are supported and could be reproduced in the VMP to make implementation from this document easier);
 - in perpetuity actions and reporting and linking to an 88B instrument on the Lot; and
 - clear locations and quantities of nest boxes and their installation included in the schedule of activities/timeline.
11. Council recommends a staged bond be calculated for the Vegetation Management Plan works and imposed to ensure this work is completed prior to return of bond instalments.
12. Council recommends a staged bond be calculated for the Blacktown Creek restoration/ frog habitat works and imposed to ensure this work is completed prior to return of bond instalments.

Drainage Matters

13. Supporting documents shall be provided in electric formal for assessment:
 - a. The OSD spreadsheet shall be provided.
 - b. MUSIC model shall be provided to confirm the reduction target and the non-potable reuse target are achieved.
 - c. DRAINS model to confirm the drainage design on both internal and external of the site
 - d. Tuflow model to show the waterway in both pre and post development
14. The submitted Civil Work package, Costin Roe Consulting, Job NumberC013904.03, Revision E and dated 06/03/24 shall be amended:

- a. the details of the proposed OSD and storm filter tank shall be provided including details of the control pit, orifice level weir level and cross-section of the tanks etc in both warehouse 1, 2 & 3. The required details can be found in Council's Engineering Guideline for Development and WSUD Standard drawing A(BS)175M.
- b. the details of the proposed bioretention & detention basin shall be provided including details of the control pit, orifice level weir level and cross-section of the basins etc in both warehouse 3, 4, 5 & 6. The required details can be found in Council's Engineering Guideline for Development and WSUD Standard drawing A(BS)175M. Secondly, the longitude section of the access track shall be provided to prove the gradient is not more the 10%. Furthermore, the solar access of the both basins are uncertain. The consultant shall confirm the basin meet the minimum solar access.
- c. The details of the permanent ponds and wetland are insufficient for assessment. More details must be provided.
- d. All pipeline details were not included in the submitted plan.