



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

17 November 2023

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

Thank you for your correspondence dated 6 October 2023 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*.

Further to our formal objection to you dated 6 November 2023, this is our supplementary submission also objecting to the proposal until the matters listed in the attachment to this letter are all addressed to council's satisfaction.

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

Email: council@blacktown.nsw.gov.au - Website: www.blacktown.nsw.gov.au

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. The Pre-Application Meeting held in June 2022 required that all setback areas were to be landscaped and maintained as open areas only, so as to enhance the streetscape appearance of the development. Council will not support car parking and internal vehicle manoeuvring except proposed driveways within these setback areas. The proposal does not comply in this regard as parking areas have been placed within the 20m southern setback to the M4 Motorway for Warehouse 2.
2. Warehouse 5 does not comply with the minimum 20m setback from Prospect Highway requirement in the north-eastern corner of the development.
3. Warehouse 1 and Warehouse 2 do not meet the minimum 7.5m setback requirement as per Section 10.2 of the Huntingwood DCP.
4. All fire tanks are to be suitably screened as the present form is unsightly and a visual eye-sore. The heights of these tanks are not adequately shown on the elevation plans.
5. The development as proposed is excessively bulky and we strongly recommend that the design be reconsidered in terms of architectural merit or breaking up the bulk of the warehouses to provide visual relief.
6. No Clause 4.6 variation has been provided in regards to the access denial provisions in Clause 7.9 of the Blacktown Local Environment Plan 2015.
7. The introduction of planting within car parking areas where possible is highly encouraged as the proposal is adding significant hardstand surfaces to the site and is expected to result in an overall increase in urban heat across the site as identified in the Social Impact Assessment Report. The installation of diamond planters every 4 to 6 parking spaces will greatly assist in providing urban canopy cover and mitigating urban heat impacts.
8. Furthermore, the use of Monument coloured sheeting on the facades should be reconsidered in light of urban heat mitigation.
9. As per Section 10.3 of the Huntingwood DCP, blank walls are to be avoided. The western elevation of Warehouse 4 is located in an area which has high visual sensitivity. The view lines from the Great Western Highway have not been provided within the Visual Impact Assessment to establish the visual impact of the proposal however this façade must be amended to establish some form of visual relief.
10. Confirm how staff at Warehouse 5 will access the parking areas. The current set up indicates all parking to be on the lower ground level with 2 levels of warehouse tenancies above. The only access however is via the shared lift/fire stair cores, given the anticipated number of staffs. It would be advisable to provide separate access for each proposed warehouse unit to ensure operational efficiency.

Blacktown City Council response **SSD-36138263 Augusta Street Warehouse and Distribution Centre**

11. The pedestrian granite pathway should ideally be connected to the Augusta Street connection to allow for local residents to be able to utilise the boardwalks and viewing areas proposed within the creek way.

City Architect Matters

12. Opportunities to increase canopy cover where possible are to be explored.

Environmental Health Matters

13. The Detailed Site Assessment recommends the submission of a Remedial Action Plan (RAP), should on-site containment be selected as a remediation strategy, Council requires all reports, plans and specifications be provided to Council for review and record keeping
14. The remediation action plan states that on-site containment would be the preferred option for soils impacted by asbestos, PAH and heavy metals. On-site containment is expected to be inside lots 2 and 3, however the RAP does not specify the exact proposed location. Clarification required.
15. Provide the final Long-Term Environmental Management Plan for Councils review.
16. The Noise and Vibration Impact Assessment has been reviewed and it is noted that that 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. Clarification required.
17. Therefore, the noise impacts on the nearby residential areas from a 24 hour operation has not been addressed to Council’s satisfaction.

Engineering Matters

18. The limit of works on Flushcombe Road is to extend up to the Great Western Highway Intersection.

Traffic Matters

19. The Plan showing the driveway access provided from Flushcombe Road to the car park of warehouse 1 is not in accordance with the upgraded signalised intersection of Flushcombe Road and Great Western Highway (GWH). A plan showing the details/design of this intersection upgrade, the proposed slip lane, the driveway location, pavement arrows and associated signs be provided for our review should this not be approved by TfNSW yet.
20. The proposal currently entails only the upgrade of Flushcombe Road between the Great Western Highway and Augusta Street however the proposed development sees private vehicles for Warehouse 2 utilise the full extent of Flushcombe Road to gain access to the Warehouse 2 carpark. On this basis and due to the expected increase in vehicular conditions on an already deteriorated section of road, it is recommended that the road upgrade works be extended to the full length of Flushcombe Road.

Blacktown City Council response **SSD-36138263 Augusta Street Warehouse and Distribution Centre**

21. Formal approval is required from TfNSW for the proposed driveway servicing Warehouse 5A,5B,5C,5D,5E,5F,5G,5H.
22. Provide a detailed Construction Traffic Management Plan.
23. Provide details regarding the Prospect Highway future road widening on lots 53,54,55 DP 1144623 and how this impacts the proposed development.

Biodiversity Matters

24. The proposal is inconsistent with controls within the Huntingwood Precinct DCP 2011 (as amended 2020).
 - a. In particular, reference should be drawn to the objectives and controls around setbacks, biodiversity and riparian corridors and the conservation areas identified in Figure 4 of the Huntingwood Precinct DCP.
 - b. In particular, sediment basins 2 & 3, a stormwater management basin, proposed access tracks for endeavour energy at the eastern end and car parking at the western end, currently sit within the 20 m landscape setback areas from the Great Western Highway and the M4 motorway. These should be relocated outside of the landscape setback areas.
 - c. The landscape setback from Flushcombe Rd is currently less than the 7.5 m stipulated in the DCP.
 - d. Per the DCP, when measured from the top of the bank on either side of the creek, development consent shall not be granted, except for development associated with protection, enhancement and management of riparian corridors, on land within the Precinct that is within 20m + 10m (buffer) of Category 2 Corridors. Figure 4 of the Huntingwood DCP shows both of the riparian corridors on site within the proposal Lots are classified as Category 2. The proposal therefore needs to remove all hardstand areas, storage, acoustic walls and the like from the riparian corridor areas.
25. In terms of mitigation measures, the EIS, BDAR and Mitigation Measures document provided propose that a Conservation and Vegetation and Construction Management Plan be developed as Conditions of consent. Council does not support this, maintaining that these designs and plans need to form part of the development application.
 - e. The reason for this is that the creek lines are important conservation areas within the Huntingwood Precinct DCP and the ability to construct and manage them for conservation with this proposal will form an important part of the assessment to support state government refusal or consent to it.
 - f. The DCP also stipulates that Flora and Fauna Management Plans are to accompany all DAs within the Huntingwood precinct inclusive of:
 - i. mechanism for enduring protection and maintenance of conservation areas and riparian corridors under private ownership;
 - ii. management tasks to maintain or improve biodiversity values (with reference to *Recovering Bushland on the Cumberland Plain - Best Practice Guidelines for the Management and Restoration of Bushland*, Department of Environment and Climate Change 2005);

- iii. public access;
 - iv. noxious and environmental weed control;
 - v. revegetation plans and protocols; and
 - vi. monitoring and reporting programs.
26. The BDAR recommends that in preference to purchase of Biodiversity Credits, any residual impacts should be offset by conservation works on the adjoining and nearby land. This is not supported by Council. It does not apply to SSD and Council has a program of improvement works already in place for the nearby areas identified. All offset credits as calculated in the BDAR should be retired as Conditions of Consent.

Drainage Matters

27. The following supporting documents shall be provided in electric format for assessment:
- i. The OSD spreadsheet shall be provided.
 - ii. MUSIC model shall be provided to confirm the reduction target and the non-potable reuse target are achieved.
 - iii. DRAINS model to confirm the drainage design on both internal and external of the site
 - iv. Tuflow model to show the waterway in both pre and post development
28. The submitted Civil Work package, Costin Roe Consulting, Job NumberC013904.03, Revision 3 and dated 08/09/23 shall be amended:
- i. 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. The required details can be found in Council's Engineering Guideline for Development and WSUD Standard drawing A(BS)175M.
 - ii. 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. 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.
 - iii. The details of the permanent ponds and wetland are insufficient for assessment. More details must be provided.
 - iv. All pipeline details were not included in the submitted plan.
 - v. The details of rehabilitated creek must be provided including cross-sections, longitudinal section with 1% AEP and PMF water level.
 - vi. The detail of the culvert on Augusta Street must be provided

