

Our ref: Augusta Street Warehouse and Distribution Centre (SSD-36138263)

Ms Athlene Kyle
Senior Development Manager
The Trustee for Huntingwood Property Trust
18/123 Pitt Street
Sydney NSW 2000

21 November 2023

Subject: Augusta Street Warehouse and Distribution Centre – Additional matters for submissions report

Dear Ms Kyle

I refer to the Department of Planning and Environment's (the Department's) previous correspondence dated 6 November 2023 which requested the provision of a submissions report in response to issues raised in public submissions and the advice provided by agencies.

In addition to responding to the submissions and advice already received, the Department is requesting that you provide additional information that effectively addresses the issues identified in **Attachment 1** of this letter.

This additional information should be incorporated into the submissions report.

If you have any questions, please contact Shaun Williams, on (02) 8275 1345 or via email at shaun.williams@planning.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read "C. Ritchie".

Chris Ritchie

Director

Industry Assessments

as delegate for the Planning Secretary

ATTACHMENT 1

Based on the Department's review of the information provided in the environmental impact statement (EIS), the Department considers further information is required to clarify matters and address inconsistencies within the documentation. In this regard, the following information is required to be provided as part of your submissions report:

Bulk and Scale

- The Department raises concern with the bulk and scale of the development, particularly the building height and proximity to nearby residential land. Section 2.20 of the State Environmental Planning Policy (Industry and Employment) 2021 (Industry and Employment SEPP) requires the consent authority to be satisfied the development's building height would not adversely impact on the amenity of adjacent residential areas.

Furthermore, Section 2.22(2)(a) of the Industry and Employment SEPP requires the consent authority to be satisfied development on land within 250 metres of land zoned primarily for residential purposes are compatible with the building height, scale, siting and character of existing residential buildings in the vicinity.

- Based on the information presented within the EIS, the Department is not satisfied the development's building height, scale, siting and character would be compatible with existing residential buildings in close proximity to the site and may adversely impact on the amenity of residential areas in accordance with Section 2.20 and 2.22 of the Industry and Employment SEPP.

Visual

- Further consideration of the potential impacts on view corridors to residential zoned land to the north of the site, visual screening and façade treatment options for the facades of the development is required.
- The Department has reviewed the Visual Impact Assessment (VIA) prepared by Habit8 Pty Ltd and does not agree with the significance of impact assessed for Viewpoints 3a, 3b, 7, 8 and 11. The Department considers Viewpoint 3a, 3b and 7 to have a Very High magnitude of change and Major to Major/Moderate significance of visual impact, Viewpoint 8 to have a High magnitude of change and Moderate significance of impact, and Viewpoint 11 to have a Very High magnitude of change and Substantial significant of visual impact.

The Department requests further information to justify the magnitude of change and significance of visual impacts prescribed for Viewpoints 3a, 3b, 7 and 8. The Department additionally requests further consideration be provided to the design of the development and/or treatment options to mitigate the visual impact of the development on these receiver locations.

- Furthermore, the Department notes Viewpoints 3a and 3b have been undertaken to simulate a ground floor and first floor comparison of residential receiver viewpoints on Hampton Crescent. However, this has not be undertaken for other viewpoints within close proximity to the

development such as Viewpoints 7 and 8 at Desley Crescent and Tyne Place. The VIA should be updated to provide additional comparison of ground floor and first floor views at Viewpoints 7 and 8.

Noise Impacts

- The Department has reviewed the Noise and Vibration Impact Assessment (NVIA) prepared by SLR Consulting Australia Pty Ltd and raises a number of comments (see below) to be addressed in an amended NVIA.
- The Department notes noise monitoring and receiver locations assessed within residential areas are located adjacent to the Great Western Highway and the development site. The Department requests clarification and suitable justification for the exclusion of noise monitoring and receiver location assessment in Oliver Crescent and the northern portion of Chapel Circuit to ascertain the comparison of noise impacts at both extents of the receiver location. Otherwise, the Department requests these locations to be included in background monitoring data.
- The NIVA has included sound power levels for heavy vehicles using ramps for Warehouse 3-4. However, it is unclear where the location of the ramps for Warehouse 3-4 is on the site. The Department requests Figure 5 of the NVIA to be updated to clearly identify all ramps as separate modelled noise sources.
- The NVIA should also be revised to incorporate each distinct outdoor operation corresponding to forklift operations as well as heavy vehicles idling, passing by, accelerating and reversing (including the contribution of energy-average noise emission associated with non-tonal reversing alarms). This would involve changes to modelled sound power levels for onsite vehicle movements and source path footprint. In addition, the representative duration of noise emission for each distinct operation should also be amended accordingly. The operational noise modelling should consider 'worst-case' emission scenarios.
- The NVIA adopts a vehicle speed of 20 km/h for heavy trucks (26 m B-Doubles) and rigid trucks (12.5 m) while accelerating up ramps for Warehouse 3-4 and 5. The Department notes that actual operational data collected at three distribution centres in NSW suggests 11m rigid truck and semi-trailers moving up ramp would generally be limited to no more than 10 km/h (see SSD-49400209). Vehicle speed affects the duration of noise emission which in turn affects the calculated LAeq,15min. As such, please adopt a speed of no more than 10 km/h unless otherwise justified with actual operational data.
- Further to the above, the NVIA should include a reversing movement speed for heavy vehicles of 5km/h unless otherwise justified with actual operational data.
- The Department notes the NVIA has modelled truck and forklift reversing alarms as occurring for a duration of 30 seconds and 90 seconds, respectively during a 15-minute worst case period. The Department seeks clarification as to whether the modelled duration of reversing alarms is a maximum total duration the 15-minute period or a duration per vehicle. Further, the Department

seeks supporting operation data to justify the modelled duration of 30 seconds and 90 seconds for truck and forklift reversing.

- It is unclear whether the height of noise sources and height of sensitive receivers has been considered in the operational noise modelling. The NVIA should be updated to clearly identify all variables within the operational noise model including, but not limited to:
 - i. height of noise sources (Note: It is unclear whether the level 2 of Warehouse 5 noise sources have been considered in the noise modelling)
 - ii. location of noise sources
 - iii. height of receptors (Note: It is unclear whether the noise model has appropriately considered the variation in levels between the site and receivers, and any two-storey receivers in the vicinity of the site).
- The Department notes the NVIA did not include an assessment of off-site road traffic noise impacts as the development is not predicted to increase Great Western Highway traffic by more than 60%. However, the development involves a new access from the Great Western Highway including a deceleration lane for heavy vehicle access adjacent to residential receivers. The Department requests the noise generation associated with heavy vehicle deceleration from the Great Western Highway to access the site should be considered in the assessment of operational noise impacts.
- The assessment of sleep disturbance predicts an exceedance of 2 dBA at the R01 receiver location as result of heavy truck airbrakes. The NVIA states that the majority of trucks utilising the site during the night-time period would be rigid vehicles which do not use airbrakes. However, the operational modelling scenario has considered 1 heavy truck and 1 rigid truck each at Warehouse 3-4 and Warehouse 5 during a 15-minute worst case period. Therefore, the Department does not consider this statement of the NVIA to be justifiable for the exceedances to the sleep disturbance criteria and further justification or suitable mitigation measures to reduce sleep disturbance should be provided.
- The Department notes the development proposes to incorporate the installation of a 3 m noise mound and 3 m noise barrier. The Department requests further information to demonstrate the effectiveness and suitability of the proposed mitigation measures to be implemented.
- The Department notes that the construction noise assessment has conservatively assumed the future noise barrier on the Great Western Highway off ramp adjacent to NCA02 receivers would not be installed prior to the commencement of construction activities. However, it is not clear if the noise barrier has been considered in the assessment of operational noise impacts of the development. Furthermore, the Department requests further information on the relevant noise modelling parameters and inputs associated with the noise barrier to inform the predicted operational impacts.
- With consideration to the above comments, the Department is not currently satisfied noise generation from fixed sources or motor vehicles associated with the development will be

effectively insulated or minimised in accordance with Section 2.22(2)(d) of the Industry and Employment SEPP.

Traffic

- The Traffic Impact Assessment (TIA) prepared by Colston Budd Rodgers & Kafes Pty Ltd identifies that traffic counts surveying of the Great Western Highway and Flushcombe Road intersection was undertaken in October 2022. The traffic survey data is now 12 months old and is not clear if it was undertaken during a school holiday period which potentially does not accurately reflect traffic volumes. Suitable justification for the use of this data or alternatively more current data should be used to inform traffic flows.
- The TIA sets out the typical weekday distribution of traffic generation in Table 7.2. The Department requests the TIA to be updated to include supporting operational data to justify the distribution of traffic generation.

Biodiversity

- The Biodiversity Development Assessment Report (BDAR) prepared by Anne Clements & Associated Pty Ltd is requested to be updated to provide further assessment on the potential indirect impacts of the development on potential fauna species with consideration to noise, traffic and light pollution.
- The BDAR should be updated to provide detailed information on the extent and processes involved with the targeted site surveying undertaken to demonstrate the site surveying was done in accordance with the '*Surveying threatened plants and their habitats*' (DPIE 2020).
- Furthermore, the BDAR does not identify the limitations of the surveying undertaken. The BDAR should be updated to include a discussion of site surveying limitations.
- The Department notes the BDAR recommends a Conservation Management Plan (CMP) or Vegetation Management Plan (VMP) be developed in conjunction with a Construction Environmental Management Plan for the ongoing management of conservation areas. The Department requests the preparation of a draft CMP/VMP or an outline of proposed mitigation and management measures to demonstrate vegetation can be appropriately managed and conserved for the life of the development.

Ecologically Sustainable Development

- The Ecologically Sustainable Development (ESD) Report prepared by E-LAB Consulting notes some materials and measures considered to address sustainability measures but does not commit to proposing any materials or measures to reduce energy consumption and improve the water efficiency of the development. The ESD Report should be updated to identify all materials and measures selected to be incorporated into the development. Furthermore, material and measure selection should be supported by energy and/or water consumption savings to demonstrate effectiveness and justification of selection.

- Section 2.4 of the ESD Report identifies strategies for meeting Net Zero 2050 targets. However, the ESD Report does not identify actions and measures to achieve these strategies. The ESD Report should be updated to provide further detail on the identified strategies.
- The ESD Report notes the development proposes on-site renewable energies through ‘a large photovoltaic array’, however a photovoltaic array has not been outlined in the EIS project description or incorporated into the design of the development. The Architectural Plans and Design Report should be updated to include the photovoltaic array as part of the development.

Management and Mitigation Measures

- In light of the comments provided above, the list of management and mitigation measures provided in Appendix D of the EIS should be updated to reflect any corresponding updates to the technical reports (including any operational mitigation measures for noise emissions). The updated list should be provided in both Microsoft Word and PDF formats.