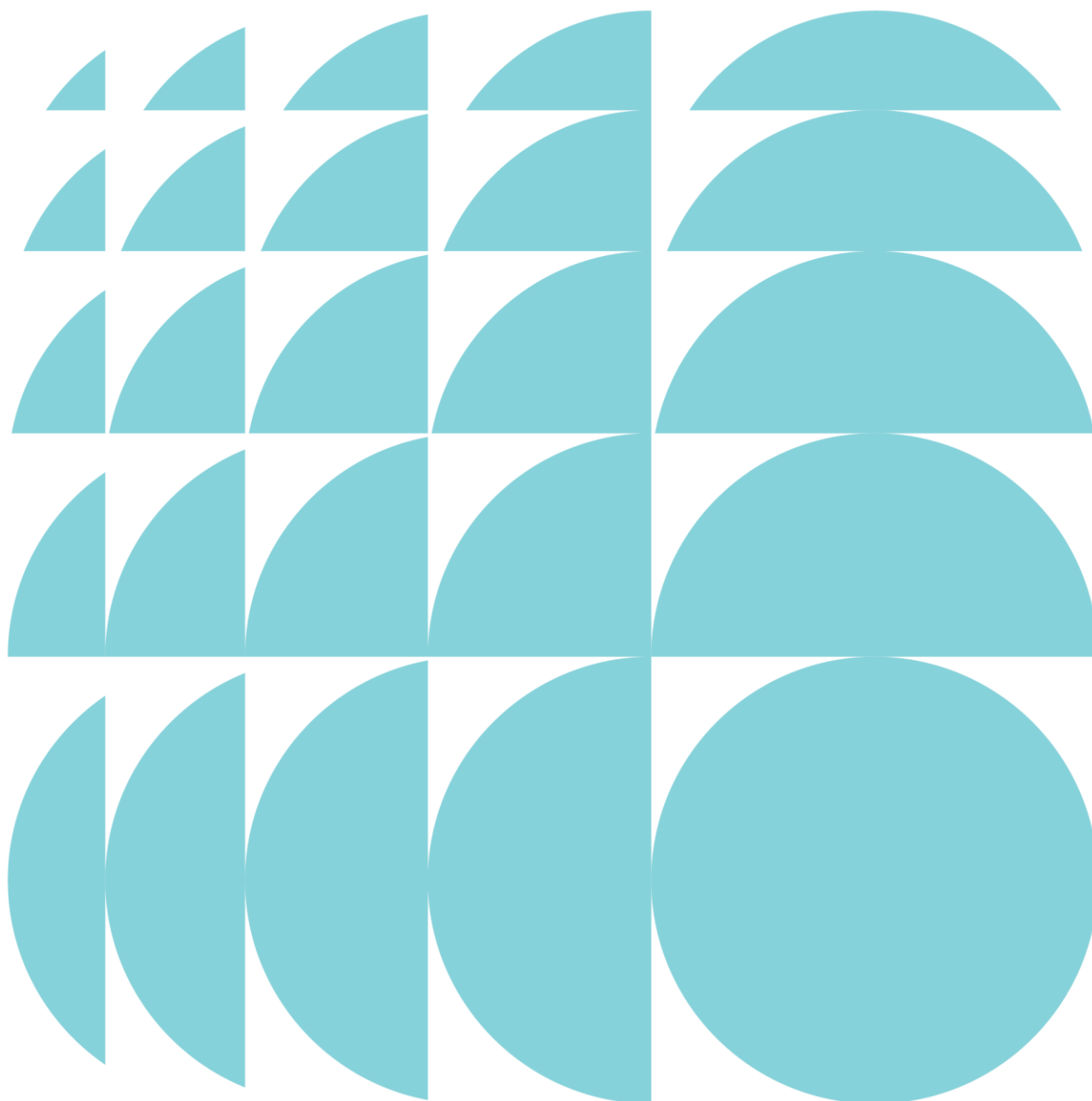


Statement of Environmental Effects

19 Holbeche Road, Arndell Park
Industrial Park

Submitted to Blacktown City Council
On behalf of Holbeche Rd Pty Ltd AFT Holbeche
Trust

08 October 2018 | 218119



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1.0 Introduction

This Statement of Environmental Effects (SEE) is submitted to Blacktown City Council (Council) in support of a Development Application (DA) for the construction of industrial warehouses on the site located at 19 Holbeche Road, Arndell Park. The DA seeks approval for:

- Bulk earthworks;
- The construction of three (3) warehouse buildings, including;
 - Provisions for up to seven (7) individual tenancies;
 - 17,222m² of floor space for warehousing and/or light industrial uses;
 - 1,306m² of ancillary office space
 - Associated hard stand areas for heavy vehicle manoeuvring and marshalling;
 - 91 at-grade car parking spaces, with future provision for an additional 172 car parking spaces if required;
- Provision of vehicle and pedestrian access connecting to Holbeche Road and Contaplas Street;
- Associated civil works and the connection of utilities;
- Minor landscaping works; and
- Site entry signage.

This SEE has been prepared by Ethos Urban on behalf of Holbeche Rd Pty Ltd AFT Holbeche Trust (Holbeche Trust) and is based on the architectural drawings prepared by Nordon Jago Architects (included in **Appendix B**) and other supporting technical information appended to the report (see Table of Contents).

This report describes the site, its environs, the proposed development, and provides an assessment of the environmental impacts, and identifies the steps to be taken to protect or lessen the potential impacts on the environment.

Pursuant to section 4.46 of the EP&A Act, the proposed development is considered Integrated Development and therefore requires concurrence from Department of Industry (now managing the Office of Water) under section 91 of the *Water Management Act 2000*.

1.1 Background

The subject site has been used for agricultural purposes since the mid-1950's, with the irrigation dam believed to be constructed between 1970 and 1985. The site, located within the industrial suburb of Arndell Park, is the last remaining agricultural lot within an area of predominantly industrial development. As such, the site has a limited development history in comparison with the broader area.

It is highlighted that an early works DA has been submitted by the proponent for site demolition, clearing and dam rehabilitation works. The early works DA (DA-18-01735) was lodged on 3 September 2018 and is currently under assessment by Blacktown Council.

1.2 Pre-DA Meeting

A Pre-DA meeting was held with Council on 19 April 2018 to discuss various aspects of the proposed development. The pre-DA meeting minutes issued by Blacktown Council are provided at **Appendix E**, and a summary of issues raised at the Pre-DA meeting is included in **Table 1**. It is noted that the scheme presented and discussed at the Pre-DA meeting has since been modified to address issues discussed at the meeting, as well as to accommodate refinements in the design.

Table 1 Summary of issues identified at the Pre-DA meeting

Issue	Comment
Planning	
<p>Blacktown Development Control Plan 2015 (BDCP) map identifies the extension of the cul-de-sac head of Contaplas Street which needs to be accommodated within the development site. Accordingly, a redesign of this section of the development is required to provide the cul-de-sac head. The warehouse buildings will be required to be setback 7.5m from the new property boundary and this area is to be landscaped. No car parking is permitted in the setback area.</p>	<p>The proposed cul-de-sac will be provided in accordance with the DCP map. Site setbacks are addressed in Section 4.3.3.</p>
<p>Part E of BDCP applies to the proposed development. The controls within the DCP need to be complied with, in particular, building setbacks and car parking. Car parking is to be provided on the basis of the following rates identified in the DCP.</p> <ul style="list-style-type: none"> • 1 space per 75 sqm GFA for the warehouse component. • 1 space per 40 sqm GFA for the office component 	<p>The proposed development is supported by a Traffic and Parking Assessment, included in Appendix K. Provision of parking within the proposed development is addressed in Section 4.10.2, and includes a request for a lower parking rate to applied due to the lower employee density associated with warehouse style development proposed on the site.</p>
<p>It must be demonstrated that each individual unit complies with the car parking generation rate for their respective uses. i.e. Calculations must be based on floor areas of the specific unit/warehouse.</p>	<p>Provision of parking within the proposed development is addressed in Section 4.9.2.</p>
<p>It must be demonstrated that each individual unit complies with the car parking generation rate for their respective uses. i.e. Calculations must be based on floor areas of the specific unit/warehouse.</p>	<p>Provision of parking within the proposed development is addressed in Section 4.9.2.</p>
<p>All turning paths/swept paths must be shown on the site plan to demonstrate that trucks can manoeuvre within the site and enter/exit the site in a forward direction at all times. A separate plan providing for the manoeuvring/turning path is to be submitted with the DA.</p>	<p>Provision of vehicle access within the proposed development is addressed in Section 4.9.1. Manoeuvring/turning paths are provided in Traffic and Parking Assessment at Appendix K.</p>
<p>The development will need to comply with the following setbacks:</p> <ul style="list-style-type: none"> • 10m setback to Holbeche Road. • 7.5m setback to Contaplas Street. <p>The applicant needs to ensure that no car parking spaces are included in the setback areas.</p>	<p>The development complies with the specified setbacks. Site setbacks are addressed in Section 4.3.3.</p>
<p>No encroachment of paved areas within the 7.5m setback required to Contaplas Street is permitted and this part of the development will need to be redesigned.</p>	<p>The Contaplas Street entrance has been designed to comply with the DCP map and associated setback requirements. Landscaping within the proposed development is addressed in Section 4.4.</p>
<p>Setback areas to the respective streets are to be attractively landscaped with trees, shrubs and ground covers.</p>	<p>As above, landscaping within the proposed development is addressed in Section 4.4. A Landscaping Plan is provided at Appendix C.</p>
<p>No containers are permitted to be stored in the car parking spaces.</p>	<p>The proposed development does not include provisions for the external storage of containers. Containers are to be stored within the proposed warehouses. It is noted that the proposed hardstand area located to the north of the site is to be used for vehicle marshalling. Containers will not be permanently stored within this hardstand area.</p>
<p>A current site contamination report must be submitted with the development application prepared by a suitably qualified geotechnical professional.</p>	<p>The Contamination Assessment is provided at Appendix G, and further addressed in Section 4.12.</p>
<p>Any works such as filling or excavation within 40m of the creek bank will trigger the development application (DA) to be integrated development under Section 91 of the Environmental Planning and Assessment Act 1979 requiring an activity approval under Part 3 of Chapter 3 of the Water Management Act 2000.</p>	<p>The proposed development is considered Integrated Development as it includes works within 40m of a Bungarribee Creek. Accordingly, the proposed development will require referral to the Office of Water (Department of Industry) for assessment.</p>

Issue	Comment
Dam dewatering management plan to be submitted with the DA.	It is noted that dam dewatering works are sought under DA-18-01735, and a Dam Dewatering Management Plan has been submitted to Council as part of that DA. No further dewatering works are proposed within this application.
Details of any cut and fill are to be shown on a separate plan including details of any retaining walls. This shall include top of wall and bottom of wall heights. Details of fencing are to be included in the DA.	The proposed development is supported by Civil Drawings, provided in Appendix D . The Civil Drawings include a cut/fill plan and general arrangement plans/sections showing the location of retaining walls. In addition to the retaining walls, various fencing is proposed. A steel palisade fencing will run along the site's southern boundary, with chain wire fencing to surround the site along the north, east and west site boundaries.
A biodiversity development assessment report (BDAR) is to be submitted with the DA.	It is noted that the clearing of vegetation and associated impacts on biodiversity are sought under DA-18-01735 and a BDAR has been submitted to Council as part of that DA. Biodiversity is addressed in Section 4.13 .
Variations in facade treatments and selection of building materials to achieve an attractive design especially to the street elevations facing both Holbeche Road and Contaplas Street is required. Articulation is encouraged to provide quality design and avoid a blank facade. Details of external building materials, finishes and colours are to be submitted with the DA.	The proposed built form, architectural and façade design is addressed in Section 4.3 . Building elevations provided at Appendix B include details of proposed materials and finishes.
Any signage proposed must be accompanied by a SEPP 64 assessment and submitted with the DA.	The proposed signage complies with the relevant assessment criteria as specified in Schedule 1 of SEPP 64. Signage is detailed Signage Plan at Appendix B , and is further addressed in Section 4.1.1 .
Engineering	
The cul-de-sac head needs to be constructed.	The proposed development incorporates construction of the cul-de-sac that connects to Contaplas Street. Access is addressed in Section 4.9 .
The consent from the land owners of 14 and 15 Contaplas Street is required, in order to construct the cul-de-sac head.	The cul-de-sac does not require any works to be carried out on land at 14 and 15 Contaplas Street, as the subdivision boundaries already provide for the cul-de-sac turning circle. As such, consent from the landowners of these properties is not required.
Deletion of the cul-de-sac head will not be supported.	The proposed development incorporates construction of the cul-de-sac that connects to Contaplas Street. The cul-de-sac is illustrated in the Architectural and Civil Drawings, included in Appendix B and D respectively.
All works to be in accordance with Councils Engineering Guide for Development and relevant Development Control Plans.	As illustrated in the Civil Drawings, included in Appendix D , construction of the proposed civil works will be undertaken pursuant to Council's engineering guidelines and the applicable controls as specified in the BDCP.
Drainage	
On lot Permanent water quality is required for the proposed development or there is a provision to enter into Voluntary Planning Agreement (VPA) for treatment in a regional facility. Where treatment is provided on a lot use MUSIC model to demonstrate that the targets under Part J of Blacktown Development Control Plan (BDCP) 2015 have been achieved. Alternatively the proposed development is located within the allocated catchment area where the developer is given the option to enter into a Voluntary Planning Agreement (VPA) with Council. The applicable contribution rate is \$62,890 per hectare plus an administrative fee of 1.5%, and is to be indexed in accordance with Council's policy on the indexing of Section 94 contributions	The proponent intends to enter into a VPA with Council in respect of the management of stormwater quality. Stormwater and drainage is addressed in Section 4.14 , while Contributions are addressed in Section 4.21 .

Issue	Comment
Where you enter into A VPA, the site requires the provision of a gross pollutant trap targeting hydrocarbons and gross pollutants prior to discharge. Typically this device would be Humeceptor or similar treating the 6 month flow. Humeceptor requires the submission of the PCSWMM report to Council requirements.	As illustrated in the Civil Drawings included in Appendix D , a VortechS 5000 Gross Pollutant Trap and associated draining systems are proposed.
An OSD is not required however the payment of a contribution under CP1 may be required if not previously paid.	The proponent will pay a contribution under CP1 if required.
A minimum 80% of non-potable water demand is to be met through the reuse of rainwater assessed using MUSIC. The 80% reuse is to be assessed using the node water balance function within MUSIC using Blacktown's standard rainfall. Non potable water demand is to include landscape watering and toilet/urinal flushing for staff and visitors. Allow for a minimum usage rate of 0.1 kl per day internal use per toilet or urinal and a minimum of 0.4 kl per m2 per year for landscape watering. The design rainwater tank volume to be shown on the drainage plans is to be a minimum of 20% greater than the rainwater tank volume used in MUSIC to allow for off-take and top-up levels. Provide a calculation sheet to detail how the final non-potable usage rates have been determined for input into MUSIC.	A 75kL underground rainwater collection tank is proposed between Building 2 and Building 3. MUSIC modelling confirms that over 80% of the non-potable demand could be met using rainwater collected in this tank.
The new updated flood models show lot 162 DP 826088 is partially flood affected at the rear. The minimum habitable floor level for the warehouse to be constructed at the rear. Is to be set at the higher of 43.50 m AHO or 225 mm above the finished ground surface.	Building 3, which is the lowest of the three buildings, has a finished floor level of RL45.210, well above the flood planning level.
Any development within 40 m from the top of the bank of Bungarabee Creek will trigger Integrated development.	The proposed development is considered integrated development as it includes works within 40m of a Bungarabee Creek. Accordingly, the proposed development will require referral to the Office of Water for assessment.
Submit a copy of the engineering checklist available from the Council website.	An engineering checklist has been provided as part of the DA Form package of information.
Submit stormwater concept plan with Development application with any electronic modelling undertaken.	A stormwater concept plan is included as part of the Civil Plans at Appendix D , and a MUSIC modelling file has been provided as part of the DA package of information. Stormwater is further addressed in Section 4.14 .
Traffic	
A traffic impact assessment report needs to be submitted.	A Traffic and Parking Assessment in support of the proposed development is included in Appendix K . Traffic is further addressed in Section 4.9 .
Truck turning paths need to be shown on the site plan at all corners of the buildings.	A Traffic and Parking Assessment in support of the proposed development is included in Appendix K , which includes manoeuvring/turning paths. Access is further addressed in Section 4.9.1
Car parking layout, driveway access must comply with AS2890.1 and AS2890.2 where applicable.	A Traffic and Parking Assessment in support of the proposed development is included in Appendix K , and includes confirmation that the design complies with AS 2890. Car parking layouts and driveway access is further addressed in Section 4.9.1
Applicant needs to construct the cul-de-sac head at the end of Contaplas Street.	As above.
The proposed access driveway must comply with the requirements of AS2890.2 and should be appropriate to accommodate the turning path of the largest vehicle accessing the site.	A Traffic and Parking Assessment in support of the proposed development is included in Appendix K , and includes confirmation that the design complies with AS 2890.2. Access is further addressed in Section 4.9.1

2.0 Site Analysis

2.1 Site Location and Context

The site is located at 19 Holbeche Road, Arndell Park (the site) within the Blacktown City Council Local Government Area (LGA). The site is located 3.2km south-west of the Blacktown Town Centre and Blacktown Station, 6km south-east of the Mt Druitt Town Centre and 2.7km north-east of the Light Horse Interchange. The site and its surrounding context is shown in **Figure 1**.

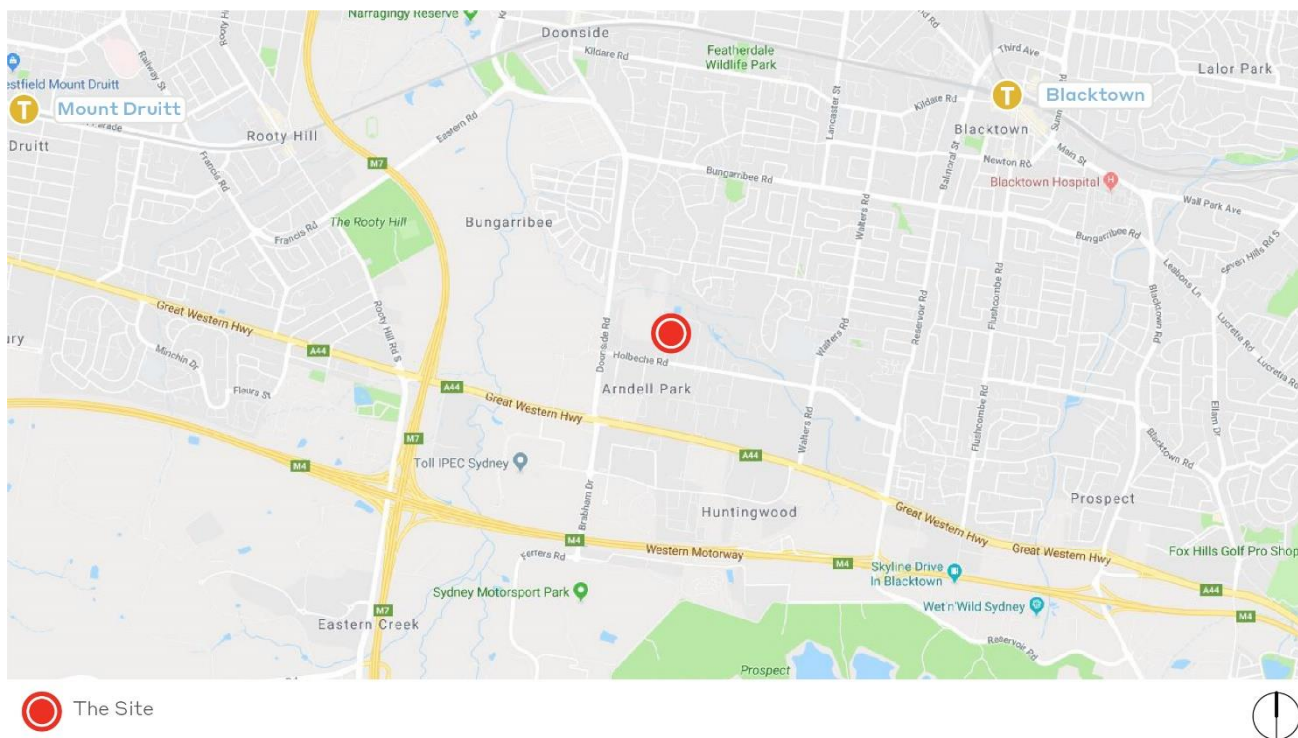


Figure 1 The site within its surrounding context

Source: Google, Ethos Urban

2.2 Site Description

The site is legally described as Lot 162 of DP826088 and is owned by Holbeche Rd Pty Ltd and AFT Holbeche Trust (Holbeche Trust) who are also the applicant. The site's area is approximately 40,310m² and its regular in shape, as illustrated in **Figure 2**. A survey plan is located at **Appendix A**. The site is primarily accessed by Holbeche Road along its southern boundary, with informal access to the north of the site also provided by Contaplas Street.



Figure 2 Aerial photograph of the sites and its surrounds

Source: Nearmap, Ethos Urban

The site experiences a significant change in level, with the highest points of the site located along its Holbeche Road frontage (RL 51.15) and sloping down towards Bungarrabee Creek along the site's northern boundary (RL 42.22). However, the site's lowest measurable point is at the perimeter of the on-site dam (RL 40.90).

Given the site's current use as market gardens, the site generally features minimal areas of vegetation. Agricultural plantings cover the majority of the site, while in the northern part of the site there is an area of established vegetation that surrounds an irrigation dam and connects to the vegetated riparian corridor of Bungarrabee Creek.

The irrigation dam is located to the north of the site and is approximately 2,700m² in area.

2.3 Existing Development

The site is currently used a market gardens, with existing development consisting of a single storey dwelling structure and associates shed structures, located 30m from the site's southern boundary. Beyond the dwelling is approximately 2.5ha of market garden which features established agricultural planting (illustrated in **Figures 3**). Towards the north of the site an irrigation dam and vegetated areas (illustrated in **Figure 4**).

The site is currently accessed by an existing driveway crossover on Holbeche Road.

DA-18-01735 was submitted by the proponent for site demolition, clearing and dam rehabilitation works on 3 September 2018, and is currently under assessment by Blacktown Council. Under DA-18-01735 the existing dwelling and shed structures would be demolished and removed, the dam would be removed and filled-in and the existing vegetation would be cleared.



Figure 3 Existing Market Gardens



Figure 4 Existing Dam and Vegetation

2.4 Surrounding Development

Development within proximity of the site consists of industrial development. Immediately east, south and west of the site are industrial developments consisting of warehouses of 1-2 storeys and their associated ancillary offices, heavy vehicle manoeuvring areas and car parks (see **Figure 5** and **Figure 6**).

Immediately north of the site is Bungarribee Creek and its associated riparian corridor, with Bungarribee Creek forming the northern extent of Arndell Industrial Park.

Approximately 50m north of the site, across Bungarribee Creek, is low-density residential development within the suburbs of Doonside and Blacktown, with Blacktown Town Centre located 3km north-east of the site. Further east of the site is a mix of low density residential and industrial development within the suburbs of Prospect, Girraween and Pemulwuy. Further south of the site is Prospect Reservoir and its surrounding industrial uses, included Sydney Motorsport Park, Atura Blacktown and Wet'n'Wild Sydney, while further west of the is the Western Sydney Parklands is a mix of low density residential and industrial development within the suburbs of Eastern Creek and Minchinbury.



Figure 5 Adjacent Industrial Buildings (east)



Figure 6 Adjacent Industrial Buildings (west)

3.0 Description of Proposed Development

This application seeks approval for the construction of industrial warehouses on the site, including:

- Bulk earthworks;
- The construction of three (3) warehouse buildings, including;
 - Provisions for up to seven (7) individual tenancies;
 - 17,222m² of floor space for warehousing and/or light industrial uses;
 - 1,306m² of ancillary office space
 - Associated hard stand areas for heavy vehicle manoeuvring and marshalling;
 - 91 at-grade car parking spaces, with future provision for an additional 172 car parking spaces if required;
- Provision of vehicle and pedestrian access connecting to Holbeche Road and Contaplas Street;
- Associated civil works and the connection of utilities;
- Minor landscaping works; and
- Site entry signage.

Architectural drawings illustrating the proposed development are included at **Appendix B**. It is noted that demolition and vegetation clearing required to facilitate the proposed development is sought under a separate DA (DA-18-01735). The key numeric development information is summarised in **Table 2**.

Table 2 Key development information

Component		Proposal
Site Area		40,310m ²
Building 1 Industrial / Warehouse Floor Space		5,621m ²
Building 2 Industrial / Warehouse Floor Space		5,636m ²
Building 3 Industrial / Warehouse Floor Space		5,964m ²
Total Industrial / Warehouse Floor Space (does not include loading docks)		17,222m ²
Ancillary Office Floor Space		1,306m ²
Total Gross Floor Area		18,528m ²
Floor Space Ratio		46%
Site Coverage (buildings only)		18,528m ² (46%)
Maximum Height	Building 1	12.2m
	Building 2	12.26m
	Building 3	13.2m
Boundary Setbacks	North	77.59m
	South	26.99m
	East	0-1m
	West	25.02m
Tenancies		Flexible (up to 7)
Tenancy size		1,695m ² – 4,172m ²
Car spaces		91 line-marked spaces, provision for up to 263 spaces in total, if required

3.1 Warehouses

The proposed development includes the construction of three (3) warehouse buildings on the site, intended for use as warehouses and distribution centres. The proposed warehouses incorporate a total of up to seven (7) tenancies, in the configuration set out in **Table 3**.

Table 3 Configuration of the proposed warehouses

Tenancy	Building	Industrial / Warehouse Floor Space	Ancillary Office Floor Space	Indicative Total Tenancy Size for Warehouse (m ²)
1	Building 1	5,621m ² (combined)	292m ²	3,550
2	Building 1		194m ²	2,934
3	Building 2	5,636m ² (combined)	158m ²	1,695
4	Building 2		83m ²	1,874
5	Building 2		192m ²	2,933
6	Building 3	5,694m ² (combined)	192m ²	2,316
7	Building 3		194m ²	4,172
Total		17,222m²	1,305m²	18,528m²

Notwithstanding this, the internal configuration of each warehouse building has the ability to change, subject to the requirement of individual tenants.

3.2 Design Principles

The proposed built form has been developed in accordance with the following design principles:

- Retention of the existing subdivision pattern;
- Improved access from Holbeche Road and Contaplas Street;
- Articulation of built form façade; and
- The efficiency of floor plans, access and car parking.

3.3 Built Form

The proposed development includes the construction of three industrial warehouse buildings, as shown in the Architectural Drawings included in **Appendix B**. The proposed buildings are specifically designed to accommodate light industrial and warehouse uses, and it is anticipated that the buildings will be used for warehouse and distribution uses upon completion. The proposed building is of a contemporary design that responds to the existing development within the Arndell Park Industrial Estate.

Within the three warehouses, interior partitions further divide the warehouses into seven individual tenancies. The proposed warehouses are 12.2-13.2m in height and are single storey. A mezzanine level is included within each tenancy for the purposes of an ancillary office use. The proposed built form is illustrated in **Appendix B**, from which key extracts have been taken and presented in **Figures 7-11**.

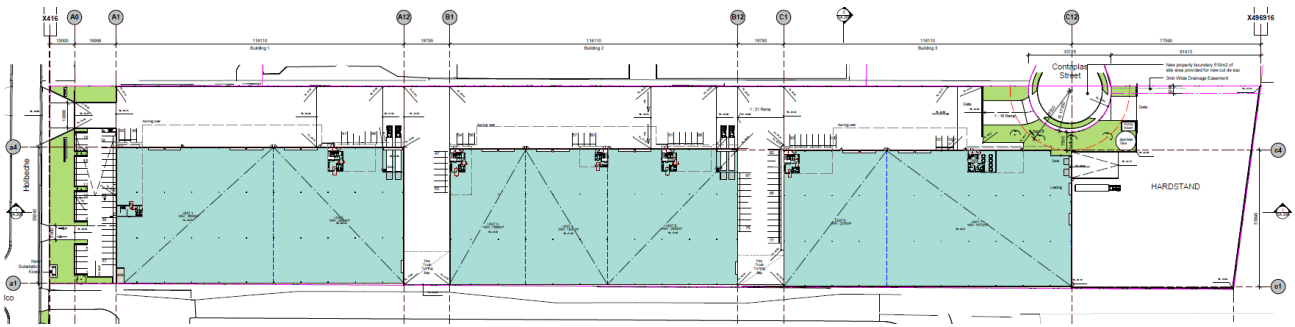


Figure 7 Site Plan identifying the extent of built form and individual tenancies.

Source: Nordon Jago

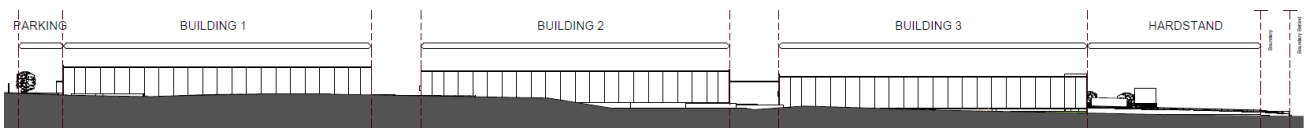


Figure 8 Cross Section of the site – East Elevation

Source: Nordon Jago

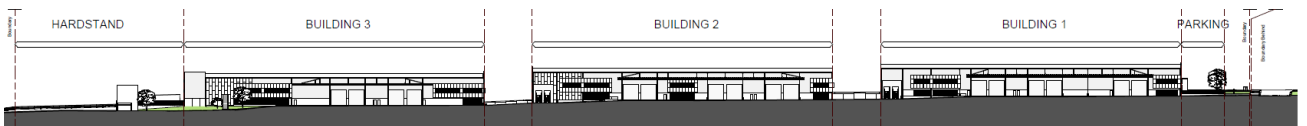


Figure 9 Cross Section of the site – West Elevation

Source: Nordon Jago

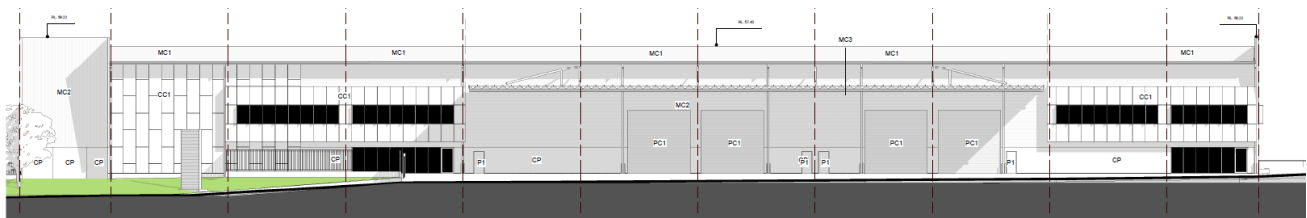


Figure 10 West Elevation of Warehouse 3 (detailed)

Source: Nordon Jago

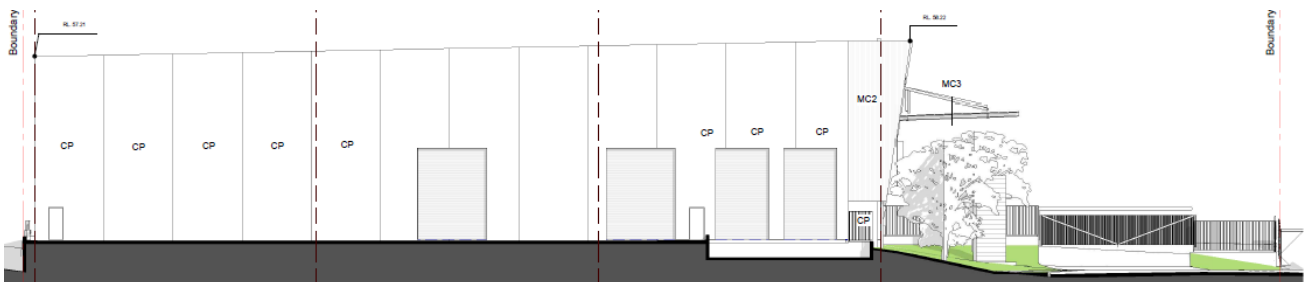


Figure 11 South Elevation of Warehouse 3 (detailed)

Source: Nordon Jago

3.4 Access

Access to the proposed warehouses is afforded by a driveway which aligns with the western boundary of the site, connecting to Holbeche Road along the site's southern boundary and Contaplas Street at the site's north-western boundary. The proposed works include the construction of a cul-de-sac at the junction of Contaplas Street and the proposed driveway.

3.4.1 Parking

The proposed development includes the construction of 91 at-grade car parking spaces. The majority of car parking spaces are located within a designated car parking toward the south of the site, accessed from Holbeche Road. The remaining car parking spaces are located throughout the site between each of the three warehouses. In addition to the 91 spaces required to accommodate warehouse use of the site, it is proposed to provide for the future construction of an additional 172 car parking spaces if the employee density at the site warrants future parking provisions. These additional car parking spaces can be provided in the future along the western boundary of the site.

3.4.2 Loading

Each of the proposed tenancies includes provisions of loading, accessed from the internal driveway. Loading areas have been designed to accommodate a 19.0m truck, with the access driveway designed to accommodate the turning requirements of these vehicles.

3.4.3 Public Transport

The site is serviced by the 723 and 724 Bus Service which travels along Holbeche Road and connects to Blacktown Station (3.2km north-west of the site). The closest bus stop is located on Holbeche Road, 30m from the site.

3.5 Landscaping and Hardstand Area

The proposed development includes landscaping treatments along the site's frontage to Holbeche Road, surrounding the proposed turning circle and intermittently throughout the car parking areas as required by the Blacktown Development Control Plan 2015. Given the industrial nature of the proposed development, landscaping treatments are intended to visually soften the hardscape created by the proposed development. The proposed development incorporates a steel palisade fence along the site's southern boundary and a chain wire fence surrounding the north, east and west site boundaries.

The proposed development includes a hardstand area of approximately 5,000m², located within the northern extent of the site. The hardstand area will be utilised of vehicle parking, manoeuvring and marshalling.

3.6 Earthworks, Civil and Utilities

The proposed development involves various earthworks, civil works and the connection of utilities. Earthworks include the levelling of the existing site to facilitate the construction of the proposed development. The extent of earthworks is detailed in the Civil Drawings included in **Appendix D**. Civil works include the construction of the driveway and the turning circle. Utilities including electricity, water, telecommunications and sewerage will be connected to the site by their respective service infrastructure, provided by Holbeche Road.

It is noted that the demolition of existing farm structures on the site and the clearing of vegetation if sought under a separate DA (DA-18-01735), currently under assessment by Council. No additional demolition or clearing works are proposed as part of this application.

3.7 Signage

The proposed development incorporates the installation of two (2) business identification signs and one (1) building/site identification sign. The proposed signs are located adjacent to the proposed development's two entrances, along Holbeche Road and the cul-de-sac that accesses the Contaplas Street.

3.8 Hours of Operation

It is intended that the site is subject of operations only during normal daytime hours, being 7am to 6pm.

3.9 Plant and Equipment

As no manufacturing uses are proposed there is minimal fixed plant and equipment proposed to be installed. Typical plant and equipment that will be used at the site include the operation of heavy vehicles, and onsite loading plant such as forklifts. The warehouses and ancillary office areas will also be subject of mechanical air conditioning where required.

3.10 Staging

It is acknowledged that the proposed development as envisaged in this SEE is dependent on the approval of a separate DA for demolition and clearing of vegetation on the site. As such, an assessment of the proposed development's impacts is specific to the construction, use and operation of the warehouses, with issues relating to the demolition and vegetation addressed under DA-18-01735.

The construction of the three warehouse buildings may be carried out on a staged basis, subject to market demand and tenant requirements.

4.0 Assessment of Environmental Impacts

This section considers the planning issues relevant to the proposed development and provides an assessment of the relevant matters prescribed in section 4.15(1) of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

4.1 Environmental Planning Instruments

The DA's consistency and compliance with the relevant statutory plans and policies is located in **Table 5**. Variations to, and non-compliance with, the key standards and guidelines highlighted in the table are discussed in the following sections of this environmental assessment.

Table 5 Summary of consistency with key statutory plans and policies

Plan	Comments	
Legislation and State Environmental Planning Instruments		
Environmental Planning and Assessment Act 1979	The proposed development is required to be assessed under Part 4 the EP&A Act. It is considered Integrated Development under the EP&A Act, due to its proximity to a riparian zone. This DA will require referral to the Department of Industry (Office of Water). The proposed development is considered a Controlled Activity in accordance with the <i>Water Management Act 2000</i> .	
Biodiversity Conservation Act 2016	The proposed development relies on clearing proposed under DA-18-01735. This clearing involves the proposed removal of native vegetation identified on the NSW Biodiversity Vales Map, and has therefore been assessed under Part 7 of the <i>Biodiversity Conservation Act 2016</i> . DA-18-01735 is supported by a Biodiversity Development Assessment Report. Biodiversity is further addressed in Section 4.13 .	
State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)	The Phase II Environmental Site Assessment prepared for the site (see Appendix G) demonstrates the site is suitable for the proposed development.	
State Environmental Planning Policy No. 64 – Advertising and Signage (Signage SEPP)	As the proposed development includes signage that is visible from the public domain, SEPP 64 applies. The proposed development's compliance with the relevant provisions of SEPP 64 is discussed in Section 4.1.1 .	
Local Planning Instruments and Controls		
Blacktown Local Environmental Plan 2015	Clause 2.1 – Zone	The site is located within an IN2 – Light Industrial land use zone. The proposed warehouse, business identification and building identification signage is permitted with consent in the IN2 zone.
	Clause 4.3 – Height of Buildings	The BLEP does not prescribe a maximum height of building for the site.
	Clause 4.4 – Floor Space Ratio	The BLEP does not prescribe a maximum floor space ratio for the site.
	Clause 5.10 – Heritage	The site and its immediate surround do not contain items of local or State heritage significance.
	Clause 7.1 – Flood Planning	The northern portion of the site is identified as having a low-medium risk of flooding. Flooding is further addressed in Section 4.15 .
	Clause 7.3 – Riparian land and watercourses	The northern portion of the site is identified as Riparian land. The proposed development includes the construction of hardstand, and is to be referred to the Department of Industry (Office of Water).

4.1.1 State Environmental Planning Policy No. 64 – Advertising and Signage

As the proposed development incorporates signage that is visible from the public domain, the provisions of *State Environmental Planning Policy No. 64 Advertising and Signage* (Signage SEPP) apply. The proposed signage is considered business identification and building/site identification signage in accordance with the definition as prescribed by SEPP 64. The proposed signage does not contain advertising of a third-party business or activity unrelated to the proposed development.

Schedule 1 of SEPP 64 contains a range of assessment criteria which are matters for consideration by the consent authority in assessing applications incorporating signage. As assessment against this is detailed in **Table 6**.

Table 6 Schedule 1 Assessment SEPP 64

Assessment Criteria	Comments	Compliance
1 Character of the area		
Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located?	The proposed signage is consistent with existing signage in the immediate surrounds and provides essential business identification synonymous with industrial park development. The proposed signage is consistent with the character of the area.	Yes
Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?	The proposed signage is consistent with business and site identification seen within the immediate surrounds. The scale and content of signage follow a theme of signage seen throughout the industrial estate.	Yes
2 Special areas		
Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas?	Noting a sign's proximity to the Bungarabee Creek and the adjacent residential development, the proposed signage is located a significant distance from these areas. Accordingly, the proposed signage will have a negligible impact on the visual amenity of these areas.	Yes
3 Views and vistas		
Does the proposal obscure or compromise important views?	As the proposed signage is wholly contained within the site and is not located within an area of important views, the proposed signage will not obscure important views.	Yes
Does the proposal dominate the skyline and reduce the quality of vistas?	The proposed signage is of a form and scale that will not result in a dominant presence within the skyline.	Yes
Does the proposal respect the viewing rights of other advertisers?	As the proposed signage is wholly contained within the site, the signage will not result in the masking of existing signage and reducing the viewing rights of existing signage	Yes
4 Streetscape, setting or landscape		
Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?	The proposed signage is of a consistent form and scale of signage within the immediate surrounds. The proposed signage is of a scale that is appropriate for an industrial park context.	Yes
Does the proposal contribute to the visual interest of the streetscape, setting or landscape?	As the proposed signage is for building/site identification and business identification purposes, the proposed signage will not contribute visual interest within the surrounds.	N/A
Does the proposal reduce clutter by rationalising and simplifying existing advertising?	The proposed signage incorporates the business identification information for seven tenancies within one structure. Accordingly, the proposed signage rationalises and simplifies various content. Notwithstanding this, the proposed signage does not rationalise existing advertising, nor does the proposed signage contain advertising content.	Yes
Does the proposal screen unsightliness?	The proposed signage is of a form, scale and location which provides minor screening of industrial developments within the immediate surrounds.	Yes
Does the proposal protrude above buildings, structures or tree canopies in the area or locality?	The proposed signage is wholly contained within the ground level of the existing site and does not protrude above the roof level of the surrounding buildings.	Yes
Does the proposal require ongoing vegetation management?	The proposed signage does not contain vegetation or landscaping elements	N/A

Assessment Criteria	Comments	Compliance
5 Site and building		
Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located?	The proposed signage is consistent with the proportions of signage within the surrounds and the scale of buildings within the surrounds. The proposed signage is of a contemporary design that is consistent with the proposed built form, also sought under this application.	Yes
Does the proposal respect important features of the site or building, or both?	The site and the proposed built form sought under this application are not considered to display importance features. Accordingly, the proposed signage will not result in an adverse impact on site or building features.	Yes
Does the proposal show innovation and imagination in its relationship to the site or building, or both?	The proposed signage is of a contemporary design that rationalises the signage for seven tenancies within one concise sign, consistent with the design of the built form as sought under this application.	Yes
6 Associated devices and logos with advertisements and advertising structures		
Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed?	The proposed signage does not contain safety devices, nor do they contain the advertising material of third parties.	N/A
7 Illumination		
Would illumination result in unacceptable glare? Would illumination affect safety for pedestrians, vehicles or aircraft?	The proposed signage does not incorporate illuminated elements.	N/A
Would illumination detract from the amenity of any residence or other form of accommodation?	The proposed signage does not incorporate illuminated elements.	N/A
Can the intensity of the illumination be adjusted, if necessary? Is the illumination subject to a curfew?	The proposed signage does not incorporate illuminated elements.	N/A
8 Safety		
Would the proposal reduce safety for any public road?	The proposed signage is wholly contained within the site and is located a significant distance from the both Holbeche Road and Contaplas Street. Accordingly, the proposed signage will not result in reduced safety of these roads.	Yes
Would the proposal reduce safety for pedestrians/cyclists?	The proposed signage is wholly contained within the site and is located a significant distance from the both Holbeche Road and Contaplas Street. The proposed signage does not contain illuminated or dynamic that would reduce safety for pedestrians or cyclists.	Yes
Would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas?	The proposed signage is wholly contained within the site and is located a significant distance from the both Holbeche Road and Contaplas Street. Accordingly, the proposed signage will not obscure views that would reduce safety within the surrounds.	Yes

4.2 Development Control Plans

The DA's consistency with the Blacktown Development Control Plan 2015 (BDCP 2015) is discussed in **Table 7**. The proposed development is consistent with the objectives of the DCP. As required under Section 4.15(3A) of the EP&A Act, a consent authority is required to apply DCP provisions flexibly and allow reasonable alternative solutions that achieve the objects of those standards. Where alternate solutions to the provisions are proposed, they are identified in the table and discussed in the following sections of this environmental assessment.

Table 7 Summary of consistency with statutory plans

Control	Comments
Part A - General Guidelines	
4.3 Tree preservation	It is noted that removal of trees and vegetation required to facilitate the construction of the proposed development is sought under DA-18-01735. The proposed development does not involve the removal of trees or vegetation not already assessed under DA-18-01735.
4.5 Pollution control	The proposed development will be constructed and operated within the applicable legislation and standards in respect of pollution control. Being a warehouse use, the proposed development will not result in the unreasonable emission of air pollutants. Pollution is further addressed below in relation to water quality (Section 4.14), noise (Section 4.8), waste (Section 4.22) and during construction (Section 4.19).
4.6 Noise reduction	The proposed development is supported by an Acoustic Report, included in Appendix J .
5.1 Blacktown road network	The proposed development includes provisions to complete the construction of Contaplas Street, including a cul-de-sac partly located on the site as specified in the BDCP road network map for the Arndell Park industrial area.
5.3 Cul-de-sac heads and intersections	The proposed development includes provisions to complete the construction of Contaplas Street, including a cul-de-sac partly located on the site.
6 Car parking	Provision of car parking, loading and access are included within the proposed development. Car parking is addressed in Section 4.9 .
7 Services	The proposed development will be connected to the existing services and utilities provided by the Holbeche Road reserve. A Statement of Available Pressure and Flow issued by Sydney Water is included in Appendix N .
8.1 Solar access	The proposed development is supported by Solar Analysis, included in Appendix B . Overshadowing is addressed in Section 4.8 .
8.2 Downstream owner's consent	The proposed development will result in the alteration of the ground level and drainage of the site. The proposed development also involves works within 40m of a watercourse. The proposed development includes provisions of drainage and stormwater, detailed in the Civil Drawings, included in Appendix D . The downstream land is within the Bungarrabee Creek and forms part of Council's stormwater management system.
8.3 Traffic generating development	The proposed development will result in an increased density from that of the existing site. Traffic generation is addressed in Section 4.9 .
8.4 Crime prevention through environmental design (CPTED)	The proposed development includes development that is consistent within the immediate surrounds. CPTED is further addressed in Section 4.18 .
8.5 Retaining walls and ground reshaping	The proposed development incorporates bulk earthworks as detailed in the Civil Drawings, included in Appendix D . The proposed bulk earthworks (incorporating both cut and fill) will result in a level change of up to 1-3m across the site. The proposed bulk earthworks will require a net fill volume of 14,955m ³ across the site. Following the bulk earthworks, the site will maintain a slight slope toward Bungarrabee Creek to the north. The proposed development incorporates retaining walls throughout the site, namely along the western boundary, portions of the eastern and northern boundary and near the cul-de-sac of Contaplas Street. The maximum retaining wall height is 2m.
9.4 Control of development on flood prone land	The proposed development includes land that is identified as a low-medium flood risk by Council, meaning it is affected by the Probable Maximum Flood. It is noted that part of Building 3 is located within the low-medium flood risk area. The finished floor level of Building 3 is RL 45.21m, well above the flood planning level of RL 43.5m.
10 Local overland flooding – major drainage and local runoff	As above, the proposed development is located on land that is affected by flooding, given its proximity to Bungarrabee Creek. Flooding is further addressed in Section 4.15 .
Part E - Development in Industrial Zones	
4.1 Setbacks	The proposed development is features building setbacks that are consistent with the those specified for industrial development. The proposed development applied a 10m setback from the front boundary to Holbeche Road, and 7.5m setbacks from the new Contaplas Street cul-de-sac, as required by the DCP. Setbacks are addressed in Section 4.3.3 .
4.2 Landscaping	The proposed development incorporates provisions for landscaping as illustrated in the Landscape Plan included in Appendix C . Landscaping is further discussed in Section 4.4 .

Control	Comments
4.3 Consideration of adjoining land	<p>The proposed development adjacent Bungarribee Creek, its riparian lands and residential development further north. Notwithstanding this, the proposed development of warehouses is considered appropriate for the site and permissible within the IN2 – Light Industrial land use zone. It is similar in type and scale to existing warehouse style development at 21 Holbeche Road and 8 Contaplas Street, as well as more broadly throughout the Arndell Park Industrial Estate. The proposed development incorporates a building design which responds to the surrounding character and provides appropriate landscaping. These elements provide an appropriate interface with surrounding uses.</p> <p>As the proposed development is to be used as a warehouse, its operation will have a negligible effect on the surrounding development. It is suitably screened from existing residential properties by Bungarribee Creek.</p>
4.5 Building design and construction	The proposed development includes built form that demonstrates appropriate height, scale and materiality. Architectural design is further discussed in Section 4.3 . The proposed development is supported by a BCA Report, included in Appendix M .
4.6 Open storage areas	The proposed development does not include provisions for open storage areas. Storage of goods will generally be contained within the warehouse buildings. The proposed development includes a hardstand area located north of the site. This area is to be used for the marshalling of vehicles (specifically trucks) associated with the operation of future tenancies.
4.7 Vehicular access and circulation	As illustrated in the Architectural Plans (included in Appendix B) and further supported by the Traffic and Parking Assessment (included in Appendix K) the proposed development incorporates appropriate provisions of access and manoeuvrability.
4.8 Car parking	The proposed development includes the construction of 91 formal car parking spaces, which is sufficient for the lower employee density associated with the proposed warehouse uses at the site. A further 172 parking spaces are able to be provided if the employee density at the site increases in the future. Car parking is further discussed in Section 4.9 .
7.1 Services	The proposed development will be connected to the existing services and utilities provided by the Holbeche Road reserve. A Statement of Available Pressure and Flow issued by Sydney Water is included in Appendix N .
7.2 Pollution control	As above, the proposed development will be constructed and operated within the applicable legislation and standards in respect of pollution control. Being a warehouse use, the proposed development will not result in the significant emission of air pollutants, water pollutants, noise or waste.
7.3 Areas requiring fill	The proposed development will require a net fill volume of 14,955m ³ across the site. Bulk earthworks are detailed in the Civil Drawings, which include a cut/fill plan, provided in Appendix D . It is noted that dam-dewatering works required to facilitate the proposed development were sought under DA-18-01735. Bulk earthworks are addressed in Section 4.6 .
Part G - Site Waste Management and Minimisation	
3.4 Performance standards for development	The proposed development is supported by a Waste Management Plan, included in Appendix H . Waste management is addressed in Section 4.17 .
Part I – Contaminated Lands Guidelines	
4.1 Procedures for DAs	The proposed development is supported by a Stage 2 Detailed Site Investigation (contamination). Contamination is addressed in Section 4.12 .
Part J - Water Sensitive Urban Design and Integrated Water Cycle Management	
4.1 General	The proposed development incorporates stormwater and water cycle management, including draining systems and sediment basins. These provisions are detailed in the Civil Drawings included in Appendix D .
4.2 Water quality	In accordance with the DCP, the proponent will enter into a VPA to make a monetary contribution to the regional water quality management system.
4.3 Water conservation	The proposed development includes a 75kL rainwater collection tank that will be used to ensure that 80% of the on-site non-potable water demand can be met by captured rainwater.
4.4 On-site stormwater detention and waterway stability	As specified in the Pre-DA meeting, the site is not required to provide on-site stormwater detention, as Council operate a regional stormwater detention system for the Arndell Park industrial area.
4.5 Erosion, sediment and pollution control	The proposed development incorporates measures in respect of erosion and sediment control, as illustrated in the Civil Drawings at Appendix D .

4.3 Built Form

The proposed development includes the construction of three warehouse buildings that are consistent with development within the immediate surrounds, and the broader Arndell Park Industrial Estate. The proposed built form is generally consistent with the design guidelines as stated in the BDCP. Namely, the proposed built form incorporates a façade design that responds to development within the immediate surrounds. Where possible, the proposed built form has been designed in response to the amenity of the public domain and neighbouring sites. The proposed built form is illustrated in the Architectural Plans included in **Appendix B**.

4.3.1 Floor Space

The proposed development includes the construction of three warehouses, totalling 18,528m² of gross floor area (GFA), and a site coverage of 46%. It is noted that the BLEP does not specify a Floor Space Ratio (FSR) control for the subject site. The proposed development will result in a built form that demonstrates an FSR and site coverage that is consistent with development in the immediate surrounds, and consistent with the objectives for industrial development as specified in the BDCP.

4.3.2 Building Height

The proposed warehouse building will have a maximum building height of 13.2m above the ground level. It is noted that the BLEP does not specify a height of building control for the subject site. The proposed development will result in a built form that demonstrates a building height that is consistent with development in the immediate surrounds, consistent with the objectives for industrial development as specified in the BDCP.

4.3.3 Setbacks

The proposed built form features building setbacks that are consistent with the BDCP and reiterated in the Pre-DA meeting. The proposed built form is set back 25m from the site's Holbeche Road alignment (front setback). Within the 25m setback, the proposed development incorporates a landscaped area within 10m of the front boundary. The proposed built form is set back 77m from the rear boundary to the north of the site and 25m from the western boundary. The proposed built form has a 0-1m setback with the eastern boundary in order to avoid complex level differences that would otherwise occur along the boundary with 21 Holbeche Road. Incorporating a larger setback along this boundary would also result in steep embankments or gaps between retaining walls that would be unsafe for on-site personnel and would be difficult to maintain and manage.

4.3.4 Façade and Materials

The proposed built form features a façade design and material pallet that appropriately responds to the site's orientation toward Holbeche Road and Contaplas Street. As illustrated in the Architectural Plans (included in **Appendix B**), the proposed built form features a combination of façade articulation and materiality to avoid the appearance of a blank wall on the north and west elevations. The material pallet includes finishes that are consistent with industrial development in the greater surrounds, including the use of concrete and steel finishes.



Figure 14 Perspective of the proposed building from Holbeche Road

Source: Nordon Jago

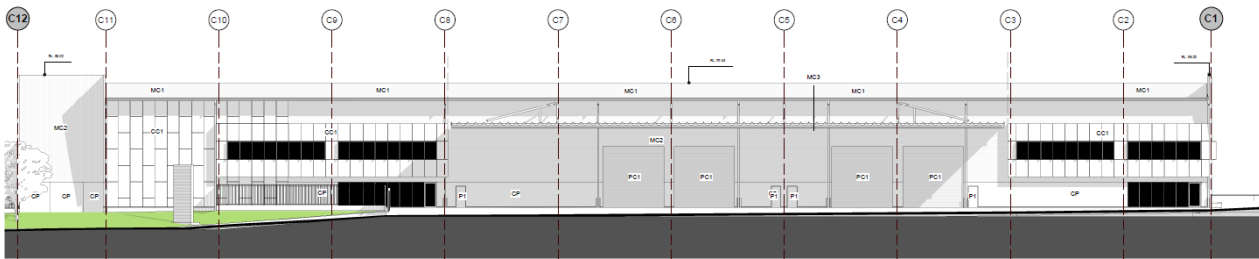


Figure 15 West elevation of Building 3

Source: Nordon Jago

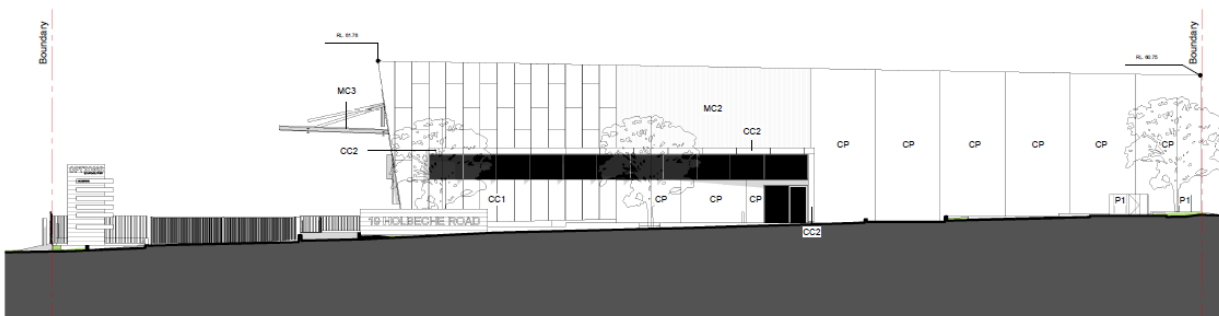


Figure 16 North elevation of Building 1

Source: Nordon Jago

4.4 Landscaping and Public Domain

The proposed landscaping design is largely consistent with the applicable controls for industrial development, as stated in the BDCP. The proposed landscaping is detailed in the Landscape Drawings included in **Appendix C**. Notably, the proposed landscaping design includes areas of planting along the site’s southern boundary, aligning with Holbeche Road. This planting acts to reinforce the human scale within the broader development, provide shade and wind protection to the adjacent area of car parking, and generally screen the hardscapes within the site. Also incorporated within the landscape design is planting within the car parking area, located on the southern side of the site. Landscaped areas also surround the proposed cul-de-sac that joins Contaplas Street. The landscaping design incorporates a mix of native and introduces tree and vegetation species.

4.5 Signage

As set out in **Section 4.1.1**, the proposed signage complies with the relevant provisions of SEPP 64. In the absence of development controls for signage within the BDCP, SEPP 64 provides the appropriate criteria in assessing the suitability of the proposed signage. The proposed signs provide for site and business identification suitable for a new industrial site.

4.6 Bulk Earthworks

The proposed development incorporates bulk earthworks as illustrated in the Civil Drawings, included in **Appendix D**. The proposed earthworks will improve the level of the existing site and facilitate the construction of the proposed built form. The works will involve both cut and fill of the existing site, resulting in a net fill of 14,955m³.

Bulk earthworks will occur across 100% of the existing site area and will generally result in a change of level by no more than 1m. Exceptions include:

- the south-eastern corner of the site where up to 3m of cut will be required,
- the northern part of Building 2 where up to 3m of fill will be required

- areas around the existing dam where the existing embankment will be by up to 3m and filling within the dam will be up to 5m deep in order to create the necessary building pad levels.

While this exceeds the preferred maximum 1m cut and fill levels as specified in the BDCP, the cut and fill required on the site is a function of the sloping nature of the site and the need for large building footprints for warehouse style buildings consistent with the character of the Arndell Park industrial area. The design has tried to achieve a cut/fill balance, however, the need for landfilling has been dictated by the presence of a large rural farm dam at the rear of the site. Apart from this area, and some localised areas associated with building pad levels, cut and fill is generally within the 1m specified in the BDCP.

Also proposed is a system of retaining walls as illustrated in the Civil Drawings, included in **Appendix D**. The retaining walls are located along the western and southern boundaries of the site and along sections of the eastern boundary of the site. The retaining walls will range from 0.6-2.0m in height, below the maximum 3m retaining wall height usually considered acceptable for industrial areas in the Blacktown local government area.

4.7 Services

The proposed development is supported by a Statement of Available Pressure and Flow, issued by Sydney Water and included in **Appendix N**. The statement confirms the availability of water as provided by Holbeche Road. Remaining services required for construction and operation of the proposed development will be provided by the Holbeche Road reserve. Given the proposed development's use as a warehouse, the proposed development is not expected to require additional provisions of services infrastructure beyond that able to be provided from Holbeche Road.

4.8 Impact on Adjoining Properties

As the proposed development will result in a built form and use that is consistent with development in the immediate surrounds, impacts on the adjoining properties from both construction and occupation of the proposed development are considered negligible.

4.8.1 Overshadowing

As illustrated in the Shadow Analysis included in **Appendix B**, the proposed development will result in minor overshadowing to the lot immediately east of the site (21 Holbeche Road) between the hours of 12pm and 3pm on 21 June. It is noted that this overshadowing effect the vehicle driveway and the west façade of the existing building. The existing building of 21 Holbeche Road is industrial in nature and features a blank wall along its western elevation. In light of this, the proposed development will result in a negligible overshadowing impact. Beyond this, overshadowing created by the proposed development is wholly contained within the site.

4.8.2 Visual Privacy and Views

As the proposed development will result in a built form and use that is consistent with development in the immediate surrounds, impacts on visual privacy and views are considered negligible. Further, the proposed built form is located over 50-60m from the nearest residential development. This separation includes Bungarabee Creek and its vegetated riparian corridor. The riparian corridor includes significant tree plantings which assist to screen the proposed development from residential dwellings further north of the site.

4.8.3 Noise

The proposed development is supported by an Acoustic Report prepared by PKA, included in **Appendix J**. The report details the findings of an acoustic assessment, undertaken to determine the acoustic condition of the existing site and the potential impacts associated with the proposed development. A noise survey was conducted to monitor the existing ambient noise in the northern portion of the site. The assessment considers the finding of the noise survey against the *NSW Noise Policy for Industry* criteria, and found that the recorded level of noise was of a level below the criteria for both residential and industrial development.

The assessment also considered the effect of noise associated with the proposed warehouse activities including operation of forklifts and found that these noise impacts are not significant and substantially below the noise criteria.

The report also considered the effect of truck activity on noise levels at the nearest residences. The assessment finds that the forecast truck activity would not exceed *NSW Noise Policy for Industry* criteria, subject of appropriate mitigation measures.

In maintaining compliance with the relevant criteria, the assessment recommends:

- The number of vehicle movements within the site be limited to 8 movements per 15 minutes, during the hours of 7am-6pm (likely operational hours)
- The selection of plant and mechanical equipment be checked in order to maintain compliance with the *NSW Noise Policy for Industry* criteria.

In light of the above, the assessment indicates that noise emissions from the proposed industrial premises and its operation will comply with the acoustic requirements of the NSW EPA *Noise Policy for Industry*.

4.9 Transport and Accessibility

The proposed development is supported by a Traffic and Parking Assessment prepared by Positive Traffic, included in **Appendix K**.

4.9.1 Access

The proposed development includes the construction of a cul-de-sac that connects the site with Contaplas Street. The assessment finds that the provisions and arrangement of access driveways and vehicle entries are adequate enough to support a 19.0m long articulated vehicle. Further, the hardstand area to the north of the site will be used for the marshalling of vehicles within the site. The assessment finds that the proposed access arrangements are compliant with *AS2890.2 - Parking facilities Off-street commercial vehicle facilities* and is therefore satisfactory.

4.9.2 Parking

For industrial/warehouses uses, the BDCP prescribes a rate of 1 space/75m² GFA (warehouse floor space) and 1 space/40m² GFA (office floor space). In reference to the proposed development, this would equate to approximately 263 car parking spaces. However, considering the nature of the proposed warehouse uses, the *RTA Guide to Traffic Generating Developments* provides a car parking rate for warehouses that is considered a better reflection of the car parking demand at the site as proposed by this DA. In particular, it is highlighted that the Council DCP rate does not provide a separate rate for warehouse versus higher-intensity industrial uses which attract a higher employment density. Therefore, The RTA Guidelines more accurately captures the likely employment density of a warehouse and distribution centre, and prescribe a rate of 1 space / 300m² GFA, requiring 90 spaces be provided by the proposed development. The proposed development includes provisions for 91 car parking space, exceeding the 90 spaces recommended by the RTA Guideline. In light of the fact that the proposed development would operate exclusively as warehouses, distribution centres and logistics depots, the provision of 263 car parking spaces is excessive and unnecessary.

It is requested that Council allow a departure from the DCP requirement in relation to car parking. 91 car parking spaces are proposed, which is a reduction of almost 61% of the 263 spaces suggested by the DCP. A variation of this size is justifiable for the following reasons:

- The number of car parking spaces is informed by the proposed use and likely associated staffing levels associated with those uses; and
- As noted in **Section 3.4.3**, the site is well serviced by public transport, being 50m from bus stops located on Holbeche Road, with services operating every 15 minutes during peak times.

It is highlighted that the site is able to accommodate the full 263 parking spaces should the need arise in the future due to increased employment density at the site. Additional 172 car parking spaces are able to be provided along the western boundary of the site and in between warehouse buildings, without comprising safe truck access and manoeuvrability. However, until such time as these car parking areas are required, they have more value for truck marshalling and manoeuvring in support of the warehouse and distribution and logistics depot land uses proposed.

4.9.3 Traffic Generation

In respect of traffic generation, the assessment employs the *RMS Technical Direction TDT-2013/04* and *RTA Guide to Traffic Generating Developments*. The guide specifies a traffic generation rate for industrial uses and business parks of:

- 0.52 trips per 100m² GFA in the AM peak
- 0.56 trips per 100m² GFA in the PM peak

Under this guidance, the assessment finds that proposed development has the potential to generate approximately 97 and 104 peak hour trips, and the AM and PM peak hours respectively two-way. However, if the areas of the loading docks/hardstand were included in the total GFA, the net traffic generation would be 110 and 118 AM/PM peak hour trips respectively, with an assumed trip distribution of 50 / 50 occurring in both the AM and PM peak periods. The assessment applied this traffic generation to the surrounding street network and found that traffic flows would be similar to that which currently occur and would remain generally within their current expected maximum for each classification of surrounding street. Therefore, the potential traffic impacts of the proposed development are considered satisfactory.

4.10 Heritage

An Aboriginal Heritage Due Diligence Assessment has been carried out by AMBS Ecology + Heritage as is provided at **Appendix I**. The due diligence assessment has been carried out in accordance with the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* and includes:

- Identification of previously recorded Aboriginal sites;
- Development of a predictive model for local Aboriginal archaeological sites, including any landscape features within the study area which are likely to indicate the presence of Aboriginal objects; and
- Identification of any constraints resulting from Aboriginal objects that may be present within the study area, and any requirements for additional Aboriginal heritage investigations or permits.

No Aboriginal objects were identified within the study area by background analysis or visual inspection. While a portion of the study area is within 200m of water, a landscape feature likely to indicate the presence of Aboriginal objects, the landform has experienced extensive disturbance through initial vegetation clearance, dam construction, track construction, and market gardening. As such, it is considered highly unlikely that evidence of previous occupation by Aboriginal people remains within the proposed development area. There are no additional constraints to the proposed development arising from considerations of Aboriginal cultural heritage and archaeology. The proposed development may proceed with due caution under the Due Diligence Code. However, should any Aboriginal objects be exposed during construction works, disturbance of the area would cease and the Cultural Heritage Division of OEH would be informed in accordance with Section 89A of the *National Parks and Wildlife Act 1974*. Works would not continue without the written consent of OEH.

4.11 Geotechnical

The proposed development is supported by a Geotechnical Investigation Report prepared by Morrow, included in **Appendix F**. The report includes the findings of a site investigation, intended to verify the site's suitability in accommodating the proposed development. The investigation involved the review of relevant geotechnical information, a site inspection and the drilling of eight boreholes throughout the site. The investigation finds that site is characterised by fill overlying residual clay and shale bedrock, of very low-medium shale strength and poorly compacted silt.

Groundwater was not observed within the boreholes drilled as part of this investigation. The report finds that the relatively low permeability of silty clay soils at the site has likely masked the presence of seepage water within the soil profile, particularly adjacent to the creek on the northern site boundary.

Testing of the site's soil salinity found that the site is highly sodic and prone to losing their structure when wet. The report proposes the following recommendations in respect of the proposed development proposed development:

- minimising water infiltration
- the use of landscaping using native plants

- sealing stormwater detention ponds
- retention of deep rooted vegetation; or
- minimising soil disturbance such as compaction and cut and fill

The report makes various recommendations in respect of future development, specifically in relation to batter specifications, retaining walls specifications, foundation and footings, earthquake site risk, soil aggressivity and design subgrade CBR. The report also recommends that further geotechnical inspections be undertaken during construction to confirm the geotechnical and hydrogeological model.

4.12 Contamination

A Detailed (Stage 2) Site Contamination Investigation in support of the proposed development is included in **Appendix G**. The objective of the investigation was to address the requirements of SEPP 55 and the BDCP by identifying the potential for contamination from past and present activities, and whether there are any associated constraints to future development. The investigation comprised:

- A review of the previous site investigations relevant to the site.
- A detailed site investigation of potential sources of contamination.
- A detailed sampling and analysis program to characterise potential soil/sediment contamination.
- Assessment of the water in the dam.

The market gardens area of the site was assessed using 42 sampling points, in a grid pattern that meets the requirements of the NSW EPA and relevant Australian Standards. Near-surface soil (0-150mm deep) was collected from each location, comprising natural soil made up of light silty clay or clayey silt, which appears to have been disturbed through the cultivation process. The analytical results were compared against relevant health-based Site Acceptance Criteria appropriate for the proposed future land use (industrial). The samples were found to be free of significant contamination which would impact on the future industrial development of the site, future users of the site and the environment.

The non-cultivated areas around were assessed at 11 sampling points targeting areas of potential contamination – two from the northern end of the site comprising sediment from the edge of the dam, and nine from the south-eastern part of the site around the house. Near-surface soil (0-150mm deep) was collected from each location, and analysed for various contaminants of concern including metals, TRH, BTEXN, PAHs, OCPs, OPPs, PCBs. At the location of the oil staining within a shed, a deeper sample was also collected at 0.5-0.6m depth to assess the depth of impacted soil.

The analytical results were compared against relevant health-based Site Acceptance Criteria appropriate for the proposed future land use (industrial). With the exception of the sample collected at the location of the oil staining, the samples were found to be below the Site Acceptance Criteria. The sample collected at the location of oil staining the concentration of TRH F3 was 6,000mg/kg, above the 5,000mg/kg criteria. Geo-Environmental Engineering note in the investigation report that the criteria adopted for the Site Acceptance Criteria is a 'management limit' above which the physical and aesthetic risk should be evaluated. Geo-Environmental Engineering confirms that in this instance the identified concentration of TRH F3 is not significant and does not require remediation or further assessment for the following reasons:

- The concentration of TRH F3 is only marginally higher than the management limit, which is itself of low reliability.
- The TRH F3 result is from a localised source and the depth of exceedance of the limit is restricted to the upper 0.5m of soil.
- The TRH F3 concentration does not pose a risk to human health as the concentration is significantly less than the corresponding health-based screening levels relating to vapour intrusion and direct contact.
- It is proposed in the future to cover this part of the site with a concrete slab and an industrial warehouse and therefore there would be no direct pathway for plants and invertebrates. Likewise, there would be no aesthetic issue as the TRH impacted soil will be covered.
- TRH F3 is considered to be relatively immobile and the surface slab will further minimise its mobility.

The dam water was analysed as being of generally good quality with no exceedance of the ANZECC/ARMCANZ trigger values recommended for freshwater in a slightly modified ecosystem.

Groundwater is unlikely to be contaminated because there was no significant chemical contamination identified during the soil sampling and analysis program, and the natural soil beneath the site predominantly comprises silty clay which has relatively low permeability and would restrict vertical migration of contaminants through the soil profile.

Based on the analysis provided in the Detailed (Stage 2) Site Contamination Investigation the site is assessed as being suitable in its current condition for existing and proposed future industrial land use. No remediation is therefore proposed as part of this development application.

4.13 Biodiversity / Flora and Fauna

It is noted that the clearing of existing vegetation within the subject site has been sought under DA-18-01735, which is currently under assessment.

The proposed development does not incorporate further clearing of vegetation beyond that sought under DA-18-01735. DA-18-01735 was accompanied by a Biodiversity Development Assessment Report (BDAR) which assessed the impact of clearing, and included appropriate mitigation measures.

As the proposed development as sought under DA-18-01735 would result in negligible impacts to flora and fauna, the BDAR finds that there is no requirement for an EPBC Act referral regarding Commonwealth threatened species, communities or populations.

4.14 Stormwater

The proposed development involves the construction of drainage and stormwater infrastructure, as illustrated in the Civil Drawings, included in **Appendix D**. These works include the construction of an in-ground stormwater drainage network, culminating in a Gross Pollutant Trap (GPT) located to the north of the site, with managed overflow to Bungarribee Creek. The applicant has elected to construct a GPT on the site and will enter into a Voluntary Planning Agreement (VPA) with Council to make a monetary contribution towards regional water quality management system.

It is also noted that the subject site is located within a regional catchment area managed by Blacktown Council. Therefore, on-site stormwater detention is not required.

MUSIC modelling has been carried out to demonstrate that over 80% of the non-potable water demand could be met using rainwater collected on site. The MUSIC-Link Report is provided at **Appendix O**.

4.15 Flooding

The proposed development includes land that is identified as a low-medium flood risk by Council, meaning it is affected by the Probable Maximum Flood but generally not by the 100-year flood level.

Flood Advice has been received from Blacktown Council (see **Appendix P**). In accordance with Council's Flood Advice Letter further discussion was undertaken with Council's flood engineer and it was agreed that no flood study was required as the only filling within the 1:100 Annual Recurrence Interval flood level is in relation to the filling of the on-site dam.

It is noted that parts of Building 3 are located within the low-medium flood risk area. The finished floor level of Building 3 is RL 45.21m, well above the flood planning level of RL 43.5m.

4.16 Air Quality

As the proposed development will result in a use that is consistent with that of the immediate surrounds, impacts on air quality associated within the construction and occupation of the proposed warehouses are considered negligible. Further, as the proposed development will be used exclusively as a warehouse and distribution centres, light

industries and logistics depots, the proposed development will not result in the emission of air pollutants associated with some industrial or manufacturing uses.

4.17 Waste Management

The proposed development is supported by a Waste Management Plan (WMP) prepared by Dickens Solutions, included in **Appendix H**. Waste management associated with construction is addressed in **Section 4.19**.

The WMP specified the following management practices:

- The proprietor of each tenancy would be responsible for managing waste and recycling generated by their operation, with each tenant managing waste in accordance with the WMP.
- A licensed private waste and recycling contractor will provide all general waste and recycling services to the building.

The WMP adopts the following criteria for waste and recycling generation, informed by *The Better Practice Guide for Waste Management in Commercial and Industrial Buildings*.

Service	Land Use	Waste and Recycling Generation
Waste	Warehouse/Office/Showroom	50.0 litres per 100m ² of floor area per day
Recycling	Warehouse/Office/Showroom	25.0 litres per 100m ² of floor area per day
Waste	Light Industrial/Manufacturing	50.0 litres per 100m ² of floor area per day
Recycling	Light Industrial/Manufacturing	25.0 litres per 100m ² of floor area per day

Accordingly, the proprietor of each tenancy will be required to accommodate waste storage in line with this criteria.

4.18 Crime and Public Safety

The proposed development implements the principles of Crime Prevention Through Environmental Design (CPTED), as identified in the Department of Planning's guideline titled *Crime Prevention and the Assessment of Development Applications* (2001).

CPTED is a situational crime prevention strategy that focuses on the design, planning and structure of the environment. It aims to reduce opportunities for crime and increase perceived safety by employing a range of design and place management principles. The design of the proposed development reflects its purpose and generally accords with the principles of CPTED, as detailed below.

Surveillance

Effective natural and incidental surveillance can reduce the opportunities for crime. The principle indicates that offenders are often deterred from committing a crime in areas with high levels of natural surveillance. The following design interventions benefit optimal natural surveillance:

- Clear sight lines between public and private places and maximising natural surveillance;
- Appropriate lighting and effective guardianship of communal and/or public areas; and
- Minimal opportunity for offenders to conceal themselves or entrap victims.

Natural surveillance is achieved by increased occupancy of the site, as a result of the warehouse's operation. Surveillance of the site is also benefited by the design of the building, which is void of recesses and spaces of undesignated use.

Lighting and Technical Supervision

Effective lighting and discrete technical supervision can reduce fear, increase community activity, improve visibility and increase the likelihood of offenders being detected. Lighting and technical supervision are integral in increasing the safety and perceived safety.

The proposed development of the site provides the opportunity for new lighting to be installed in accordance with minimum Australia and New Zealand Standards and in particular, the objectives for crime and fear reduction as outlined in Australian Lighting Standard AS/NZ 1158. High-quality lighting throughout all publicly accessible areas should be adequate to permit facial recognition, informal surveillance and reduce the threat of predatory crime.

The proposed development will incorporate appropriate provisions of lighting. Selected lighting fixtures will be determined during construction.

Territorial Reinforcement

Territorial reinforcement involves the perceived ownership of public spaces. Users will be more inclined to visit areas that are maintained, and in which they feel they have a vested interest. A well-used and dynamic public space is made safer by natural surveillance. Designing with clear transition between public and private spaces, and clear design cues indicating the intended use of space is critical.

As the proposed development is likely to be occupied during business hours, the continuous presence of staff during these times further improves territorial reinforcements as it creates effective guardianship.

Environmental Maintenance

There is a strong association between environmental maintenance and the fear or perceived fear of crime. General image can greatly affect the individuals desire to enter and engage with space. Environmental maintenance and territorial reinforcement are co-dependent in achieving a safer space and are integral in achieving optimal natural surveillance. The maintenance of the built form, landscaping and lighting will assist in communicating care and the presence of effective guardianship. Routine maintenance is a strong indicator of area management and safety. The landscaping within the site will be regularly maintained to assist in projecting a safe area.

The Management of Activity and Space

Similar to environmental maintenance, there is a strong association between activity and space management, and the fear or perceived fear of crime. Unlike environmental maintenance, this principle endeavours to manage the more dynamic activity and use of space. As the proposed development incorporates a consistent use (warehouse), conflict between various activities on the site is unlikely. The management of activity and space is further benefited by personnel employed within each tenancy.

Access Control

Access control strategies restrict, channel and encourage the movement of people and vehicles into and through designated areas. Unauthorised entry is reduced by physical and technical barriers, as they increase the effort required to commit a crime. Tenants will manage access control at their discretion.

4.19 Construction Impacts

Construction impacts associated with the proposed bulk earthworks and construction works are discussed below.

4.19.1 Sediment and Erosion Control

A Sediment and Erosion Control Plan in support of the proposed development is included in **Appendix D**. The plan involves the installation of catch drain along the site's western boundary, sediment fencing along sections of the sites eastern and western boundaries. Sediment fences have also been located along the northern boundary of the site to prevent the flow of sediment-laden water from the site towards Bungarrabee Creek. A temporary sediment basin will be constructed in the northern part of the site during construction works.

4.19.2 Waste Management

A Waste Management Plan (WMP) in support of the proposed development is included in **Appendix H**. The WMP addresses waste generated by construction as follows:

- Excavated Materials (approximately 12,100m³ to be generated) will be kept and reused to the extent necessary, subject to contamination/remediation requirement. Residual amounts will be disposed of off-site to a suitably licenced site subject to meeting environmental criteria.

- Bricks (approximately 5 m³) will be cleaned and reused for various construction purposes, either whole or as aggregate (75-90%). Residual amounts will be disposed of off-site to a suitably licenced site subject to meeting environmental criteria.
- Concrete (approximately 10 m³) will be mostly crushed and reused as aggregate (60%-90%). Residual amounts will be disposed of off-site to a suitably licenced facility.
- Timber (approximately 5 m³) will be mostly reused for formwork or studwork (65%-90%). Residual amounts will be disposed of off-site to a suitably licenced facility.
- Plasterboard and fibro (approximately 2 m³), metals (approximately 12 m³), plastics (approximately 2.5 m³) and glass (5 m³) will be entirely sent offsite for recycling or disposal.
- Metals / Steel / Guttering & Downpipes (approximately 3 m³) will be entirely sent offsite for recycling or disposal.
- Roof Tiles / Tiles (approximately 2 m³) will be mostly broken up and reused as aggregate/fill (80%-90%). Residual amounts will be disposed of off-site to a suitably licenced facility.
- Plastics (approximately 5 m³) will be entirely sent offsite for recycling or disposal.
- Glass, Electrical & Light Fittings, PC items (approximately 5 m³) will be entirely sent offsite for recycling or disposal.
- Fixtures and fittings (approximately 5 m³) will be mostly broken up and reused as aggregate/fill (80%-90%). Residual amounts will be disposed of off-site to a suitably licenced facility.
- Pallets (approximately 3 m³) will be entirely sent offsite for recycling or disposal.
- Residual waste (approximately 1,251 m³) will be entirely sent offsite for recycling or disposal.

All materials used in the construction of the building that are not required to be incorporated into it, shall be recycled, reused or disposed of in accordance with these provisions, and the requirements of the *Protection of the Environment Operations Act* (1997). It will be the developer's overall responsibility to ensure compliance in this regard. All excavated material removed from the site, as a result of the construction, will be classified in accordance with the Department of Environment, Climate Change and Water NSW Waste Classification Guidelines prior to their removal, transportation and disposal to an approved waste management facility.

4.19.3 Access

Access to the site will continue from the existing driveway crossover on Holbeche Road for the construction works.

4.20 Building Code Compliance

The following reports confirm that the proposed development is capable of achieving compliance with the requirements of the Building Code of Australia (BCA) and other relevant codes and standards:

- BCA Report prepared by AED Group (see **Appendix M**)
- Fire Services Report prepared by Olsen (see **Appendix L**)

4.21 Contributions

The proponent intends to enter into a Voluntary Planning Agreement with Blacktown City Council in relation to the management of stormwater quality from the site.

The site is also subject of the 1980s Release Areas Plan No. 1, and would be subject of drainage and roads contributions under that plan. The proponent is required to dedicate land for the Contaplas Street cul-de-sac, including the construction of the cul-de-sac as a public road on the dedicated land. Therefore, it is requested that the roads component of the 1980s Release Areas Plan No. 1 be offset against the value of the dedicated land and cost of the public roadworks.

4.22 Environmentally Sustainable Design

The proposed development will incorporate various fixtures, design features and technologies aimed to minimise the consumption of energy and water. These include the installation LED light fittings throughout the proposed development and the use of translucent roof sheeting to maximise natural light exposure.

4.23 Social and Economic Impacts

The proposed development will have significant social and economic benefits for the local community, the Blacktown LGA and NSW. These benefits include:

- Creation of employment opportunities within the industrial sector, in the Blacktown LGA;
- Creation of employment opportunities within the construction industry, in the Blacktown LGA
- A negligible effect on non-industrial land uses within the surrounding areas;
- The economic and orderly development of vacant land;
- Improved safety outcomes associated with the increase in surveillance of the site.

4.24 Site Suitability and the Public Interest

The site is considered suitable for the proposed development as it provides an industrial use consisting of warehouses, which is permissible on the site. The development is consistent with the planning provisions for the site and delivers a well-considered and responsive built form. The site is considered suitable for the proposed development as it is:

- The proposed development is consistent with the aims and objectives of the BLEP and BDCP as well as the relevant State Environmental Planning Policies;
- Permissible with consent within the *IN2 Light Industrial* land use zone;
- Consistent with character and use of the immediate surrounds;
- Respectful of site-specific constraints, including its proximity to Bungarribee Creek;
- Absent of any significant impacts on the surrounding environment and land uses.

The proposed development is considered within the public interest as it utilises vacant land (subject to DA-18-01735) for the purposes of industrial development, consistent with the applicable planning controls, absent of adverse environmental impacts and resulting in numerous social and economic benefits.

5.0 Conclusion

This application seeks approval for the construction of three industrial buildings that will be used as warehouses, associated earthworks, civil work, landscaping and signage. This SEE has provided a detailed assessment of the proposal against the relevant matters under section 4.15(1) of the EP&A Act. The proposed development is considered within the public interest as it utilises vacant land for the purposes of industrial development, consistent with the applicable planning controls, absent of adverse environmental impacts and resulting in numerous social and economic benefits. In light of the above, we recommend the proposed development be approved.