



MAJOR PROJECT ASSESSMENT:
Huntingwood West (Employment Lands)



Director-General's
Environmental Assessment Report
Section 75I of the
Environmental Planning and Assessment Act 1979
December, 2006

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1 EXECUTIVE SUMMARY

- 1.1 The 2450 hectares of land (divided into 10 Areas) that forms the area known as the Western Sydney Employment Hub (WSEH) is located in Blacktown, Fairfield, Holroyd and Penrith LGAs. Huntingwood West is identified as 'Area 5' in the Hub.
- 1.2 The Hub is in the vicinity of the M4 and M7 Motorway interchange with direct motorway access to the airport, the Port Botany and the national highway network. It is already evolving as a key location for industrial and related development with important opportunities for employment generation. The WSEH has been identified wholly as potential employment land and needs to be protected from further fragmentation and development that is inconsistent with the objective of employment.
- 1.4 On 5 December 2005 the Minister announced that he had agreed to consider the Western Sydney Employment Hub a potential State significant site (SSS) as part of the NSW Government's Metropolitan Strategy. This is being undertaken as a separate process.
- 1.5 Huntingwood West is 61 hectares of land currently zoned 5(a) Special Uses - Corridor under Blacktown LEP 1988. Rezoning of the site is required to allow employment uses, as envisaged by the Metropolitan Strategy.
- 1.6 Huntingwood West has been identified by the Department's Land Management Branch as a development site that would be able to be sold by public tender by November/December 2006, with rezoning through Part 3A of the EP&A Act. Monies generated from the sale of the Huntingwood West site will contribute to the funding of the Western Sydney Parklands. The Huntingwood West site is part of a project currently underway with Landcom for the Bungarribee Precinct, which includes development within the Western Sydney Parklands and residential development at Doonside. The disposal of this site has been approved by the Government Asset Management Committee.
- 1.7 The proponent (Landcom) is seeking concept approval for subdivision for future employment uses and associated services and infrastructure. The site will be divided into 47 nominal lots (31 lots 0.4-1ha in area; 12 lots 1-2ha; and 4 lots >2ha), with the largest nominal lot being 4.645ha. **It is important to note that in future project applications/development applications for subdivision of individual lots, the nominal lots shown on the concept plan can be amalgamated to form larger 'super-lots', if required.**
- 1.8 On 15 September 2006 the Minister for Planning declared by order in the gazette, pursuant to Section 75B(1) of the Environmental Planning and Assessment Act 1979 that the project is a Major Project under Part 3A of the *Environmental Planning and Assessment Act 1979*, and authorised the submission of a concept plan for the site.
- 1.9 On 25 September 2006 Landcom submitted a concept plan for the Huntingwood West employment lands in response to the Director General's Environmental Assessment Requirements.
- 1.10 The proposal was exhibited for 30 days between 28 September 2006 and 27 October 2006.
- 1.11 Two public submissions were received, supporting the rezoning of land within the WSEH with provisions allowing for increased and more varied retail development. No comment was made on the subdivision itself. Submissions were also received from Blacktown Council, DEC and the RTA.
- 1.12 Key agency issues raised related to: future zoning under Blacktown LEP & appropriate land uses; development contributions; road layout & intersection design; environmental management – flooding, water quality impacts, contamination, location & management of "constructed wetland", stormwater management and proposed removal of Cumberland Plain Woodland (incl. delivery and management of monetary contribution offset); retention of significant trees on site; and consultation with local Aboriginal groups.
- 1.13 The proponent has submitted a Preferred Project Report (in the form of a revised concept plan) and a revised Statement of Commitments to address the issues raised during the exhibition period.
- 1.14 In balancing the State significant planning outcomes with the issues raised above, the Department is of the view that the proponent has satisfactorily mitigated the impacts arising from the development of the Huntingwood West site. In assessing the proposal, the Department has resolved any outstanding issues through recommended modifications to the concept plan (see **Appendix A**).

2 BACKGROUND

2.1 Introduction

The Huntingwood West employment lands site is bounded by the M4 to the south, Parklands to the west, the Great Western Highway to the north, and Brabham Drive to the east (see **Figure 1**). The existing Huntingwood industrial estate lies to the east of the site, across Brabham Drive.



Figure 1. Location map of the site

The Huntingwood West site in the Blacktown LGA has an area of 61ha and is strategically located close to the intersection of the M7 and M4 Motorways. Approximately 46.13ha of the proposed subdivision is potentially developable area for employment uses.

The site is currently zoned 5(a) Corridor under Blacktown Local Environmental Plan 1988 (see **Figure 2**).



Figure 2. Current zoning under Blacktown LEP 1988

The Western Sydney Employment Hub lands, of which the Huntingwood West precinct is an integral component, have been identified in the NSW Government's Metropolitan Strategy as being of regional and state significance for employment and investment.

The land is strategically located near the intersection between the M4 and M7 Motorways which have direct access to Kingsford-Smith Airport, Port Botany and the national highway network with potential rail and freight options as well. The opening of the Westlink M7 Motorway will generate demand for new economic activities in Western Sydney, with forecasts showing that the land currently zoned for industrial purposes around the M7 Motorway will be exhausted in the next five years.

The Huntingwood West precinct is estimated to provide 800 permanent jobs, which will assist the Department in meeting the objectives of the Sydney Metropolitan Strategy which seeks to provide 2.5 million jobs by 2031. The entire WSEH has the potential to deliver an additional 929 ha of employment land, generating up to 36,000 jobs.

The Major Projects SEPP does not currently have a specific schedule or area of development that suggests that a subdivision for future employment uses in Western Sydney would constitute a major project. Therefore, on 15 September 2006 the Minister for Planning declared by order in the gazette, pursuant to Section 75B(1) of the Environmental Planning and Assessment Act 1979 that due to its regional planning significance the project ("subdivision, including associated road works, of the Huntingwood West site") is a Major Project under Part 3A of the *Environmental Planning and Assessment Act 1979* and authorised the submission of a Concept Plan for the

site under section 75M of the Environmental Planning and Assessment Act 1979. The proponent is able to submit a concept plan for subdivision for future employment uses as the project is deemed to be part permissible by virtue of "roads" being a permissible use within the 5(a) zone. This is provided by Section 75O(3) of the Act.

The plans and documentation submitted by the proponent are intended to both contribute to the study to assess whether the WSEH (of which Huntingwood West is a part) should be added to Schedule 3 of the MP SEPP pursuant to Clause 8 of the MP SEPP and the environmental assessment for the concept plan pursuant to Section 75N of the Act.

The purpose of this submission is for the Director General to provide a report on the project to the Minister for the purposes of deciding whether or not to grant approval of the concept plan pursuant to Section 75O(2)(a) of the Act. Section 75N of the Act provides that the scope of the Director General's environmental assessment report for a concept plan is the same as with respect to approvals to carry out a project as set out in Section 75I(2) of the Act. This report recommends the Minister should grant concept approval subject to modifications set out in the instrument of approval set out at **Appendix A**.

The Department also recommends that the MP SEPP be amended by adding the WSEH to Schedule 3 as it is deemed to be a matter of significance for the environmental planning of the State. This is subject to a separate process which is currently being undertaken by the Department. This does not preclude the Minister granting concept plan approval for Huntingwood West as the proposal is not wholly prohibited given the sites current zoning under Blacktown LEP 1988. This is provided by Section 75O(3) of the Act.

2.2 The site and surrounding area

Huntingwood West site is a 61ha parcel of land known as Precinct 5 in the 2450ha Western Sydney Employment Hub (WSEH) and lies in the Blacktown LGA (see **Figure 3**). The WSEH is in the vicinity of the M4 and M7 Motorway interchange with direct motorway access to the airport, the Port Botany and the national highway network. It is already evolving as a key location for industrial and related development with important opportunities for employment generation.



Figure 3. Western Sydney Employment Hub

The site is bound by the Great Western Highway to the north, Brabham Drive to the east, the M4 to the south and the Eastern Creek Parkland area to the west. 4.2ha of the site at the intersection of Brabham Drive and the Great Western Highway is in private ownership. The remainder of the site is owned by the Department of Planning. The portion of the site in private ownership currently consists of a petrol station and car repair shop. The Department owned land is largely undeveloped (see **Figure 4** for aerial photo of the site and surrounds).

The site slopes gently from Brabham Drive in the east down to Eastern Creek in the west. There is an overall fall of some 15m between Brabham Drive and the banks of Eastern Creek. The site contains some areas of Cumberland Plain Woodland (Shale Plains Woodland) within its north-eastern corner. To the west of the site (within Land Area C), significant areas of riparian vegetation are located along Eastern Creek (Swamp Oak Floodplain). Vegetation and habitat values of this woodland are high along Eastern Creek and moderate within the employment lands site. Rudders Lane bisects the site within an easement in a north south direction (including a "dog leg" mid way along its length). Rudders Lane has local heritage significance, being part of the original subdivision of the land. Major views to the site are available from the M4 and from the intersection of Great Western Highway and Doonside Road / Brabham Drive.

Agriculture, particularly grazing, is the predominant land use throughout the Parklands, and has been at Huntingwood West. The Western Sydney Parklands incorporates a number of commercial recreation facilities including the Eastern Creek Motor Raceway immediately to the south of Huntingwood West, Sydney Dragway, Olympic Equestrian Centre and a Shooting Facility. Active sporting facilities are limited to the Olympic Softball facilities near Rooty Hill and associated playing fields. Passive recreation activities such as picnic facilities are generally limited to the Western Sydney Regional Park (Horsley Park), the eastern side of Prospect Reservoir and Nurriginy Reserve.

The first stage of the Western Sydney Parklands (WSP), identified as the Bungaribee Precinct (Precinct 2), comprises development of a 493 hectare site along Eastern Creek at Doonside. The precinct will form the hub for active and passive recreation in the northern part of the Parklands. The development of the WSP will be partly funded from development of nearby land, known as the "Interface Lands", being around 50 hectares of residential land at Doonside and 46 hectares of employment land at Huntingwood West. SREP 31 – Regional Parklands provides the planning framework for development within the Parklands.



Figure 4. Aerial photo of the site and surrounds

3 PROPOSED DEVELOPMENT

3.1 Approval Originally Sought

3.1.1 Concept Plan

On 25 September 2006 the proponent submitted an Environmental Assessment (EA) report titled *Employment Lands (Huntingwood West) – Executive Summary, Concept Plan (Volume One), Environmental Assessment (Volume Two) & Supporting Documents (Volume Three)*, prepared by Landcom, The Planning Group and Architectus. The EA served three purposes:

1. To justify nomination of the site as a State significant site within Schedule 3 of the MP SEPP 2005 as part of the Western Sydney Employment Hub;
2. To address the project specific issues outlined in the Department of Planning's Director General Environmental Assessment Requirements (DGEARs); and
3. To present a **Concept Plan** for the site, incorporating development design controls (see **red Tag B**).

The concept plan proposes a 47 lot subdivision over 46.13ha of the site for employment generating uses, associated services and infrastructure, and public open space (see **Figure 5 & red Tag A**). It will deliver an employment estate that:

- Provides for a diverse range of employment opportunities to deliver up to 800 new jobs;
- Offers a transition from the Western Sydney Parklands into the employment zone;
- Requires new buildings to seek excellence in architectural design;
- Features best practice Water Sensitive Urban Design schemes including a new wetland for the Parklands;
- Builds biodiversity by requiring Cumberland Plain Woodland landscape elements and contributing to revegetation in the adjoining Parklands;
- Provides extensive landscaping that enhances visual amenity to adjoining roads; and
- Offers accessibility and connectivity to Sydney's regional road network, the adjoining employment zones and the Parklands.



Figure 5. Concept Plan

To ensure efficient delivery of business and employment opportunities to Western Sydney, this concept plan will deliver a scheme intended to attract both smaller and larger scale enterprises.

Key Features

The following are the key elements proposed in the concept plan that will ensure the principles outlined above are met.

Great Western Highway Connection (accessibility and connectivity)

A new four way intersection will be built on the Great Western Highway. The new intersection will:

- Provide access to both the Huntingwood West Employment Land and the Western Sydney Parklands located to the north and south of the Great Western Highway;
- Improve performance of the existing Great Western Highway/Brabham Drive intersection; and
- Provide a safe and convenient pedestrian and cycle crossing connecting the Parklands areas located north and south of the highway.

Access to the existing Brabham Drive Roundabout (accessibility and connectivity, urban character, minimisation of environmental impacts)

An east-west collector road that connects to Brabham Drive at the existing roundabout with Huntingwood Drive, will:

- Provide site accessibility and connectivity to and from the existing industrial zone (east of the site);
- In conjunction with the new intersection on the Great Western Highway, reduce the traffic impacts on the existing intersection: Great Western Highway/Brabham Drive;
- Feature an eco-median that incorporates stormwater management within a landscape setting – i.e. an eco-median road;
- Create green streetscapes with strong visual identity, retaining existing trees and supporting an integrated network of access links catering for pedestrian and cycle links; and
- Create a visual corridor to the Parklands.

Eco-Median (urban character, minimisation of environmental impacts)

A 14.5 m wide central eco-median is proposed along the main road (east-west) that connects the site to the existing Brabham Drive roundabout. The eco-median:

- Provides an opportunity to retain existing vegetation within the public domain to preserve biodiversity and maximise site amenity;
- Reinforces the 'green' character of the proposed employment estate;
- Forms part of the integrated landscape and WSUD strategy – bio retention system treating stormwater discharge from the site and the industrial upstream catchment; and
- Brings the Parklands into the employment estate, providing a transition between the landscaping and the Parklands vegetation.

Artist's impression of the proposed Eco-median



Park Edge Road (interface, accessibility and connectivity)

The proposed park edge road will be limited to cars and light vehicles only, thus creating an appropriate interface with the Western Sydney Parklands to the west of the site.

Development Design Controls have been designed to encourage high quality facades presented to the Parklands.

Wetland System (interface, minimisation of environmental impacts)

The principle consideration in the design of the drainage network is the integration and relationship with the Western Sydney Parklands.

The stormwater management strategy consists of gross pollutant traps (GPT's) and a downstream, off-site constructed wetland. The stormwater strategy is fully integrated with the landscape strategy.

GPT's will take the form of 'precinct parks' (three) located within the development. These will:

- retain gross pollutants;
- reduce the suspended solids load; and
- balance flood detention requirements.

The wetland was identified as an ideal feature of the Western Sydney Parklands, providing a suitable interface with the Parklands. The wetland will:

- Protect water quality and provide flood storage;
- Overcome the higher risk of damage to on-site measures such as street scale bio retention systems in an industrial precinct,
- Provide a cost effective way to meet flood storage requirements to minimise post development stormwater discharge impacting Eastern Creek;
- Provide the potential to treat stormwater runoff from the site and adjoining industrial upstream catchments that drain through the site; and
- Provide passive recreational opportunities for employees.

The proposed subdivision is complemented by a robust landscape design that responds to the opportunities of both the site and the Parklands.

The Western Sydney Parklands provides not only a parkland environment for Huntingwood West but a 27km linear link to other areas of Western Sydney, i.e. pedestrian and cycle-based links for employees. At both a commuter and recreational level the Parklands provide a unique opportunity to promote healthy workers and healthy working environments.

Critical to this parkland association is the proposed extension of the ecological corridor vegetation into the streetscapes and eco-median of the main boulevard, providing flora/fauna habitat and opportunities for active/passive recreation for workers.

Water from the site is expressed in swales and wetlands which provide best practice treatment prior to water entering Eastern Creek, safeguarding the emergent ecologies of the creek line and creating a landscape aesthetic which is informed by the creek line itself.

Significant vegetative buffers are in place along the M4 and Great Western Highway boundaries so that buildings are viewed through a screen of vegetation.

3.2 Amendments to the Proposal

A detailed report responding to the issues raised in submissions was prepared by Landcom and submitted to the Department on 1 December 2006 (included in **Appendix D**). The proponent subsequently lodged a Preferred Project Report on 1 December 2006, incorporating a revised Statement of Commitments (included in **Appendix C**) to address the issues raised during the consultation period.

4 STATUTORY FRAMEWORK

4.1 Part 3A of the Environmental Planning and Assessment Act 1979

Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act) commenced operation on 1 August 2005. Part 3A consolidates the assessment and approval regime of all major projects previously considered under Part 4 (Development Assessment) or Part 5 (Environmental Assessment) of the EP&A Act.

Under the provisions of Section 75B of the EP&A Act development may be declared to be a Major Project by virtue of a State Environmental Planning Policy or by order of the Minister published in the Government Gazette.

4.2 State Environmental Planning Policy (Major Projects) 2005

State Environmental Planning Policy (Major Projects) 2005 outlines the types of development declared a major project for the purposes of Part 3A of the EP&A Act. For the purposes of the SEPP certain forms of development may be considered a Major Project if the Minister (or his delegate) forms the opinion that the development meets criteria within the SEPP.

The Major Projects SEPP does not currently have a specific schedule or area of development that suggests that a subdivision for future employment uses in Western Sydney would constitute a major project. Therefore, on 15 September 2006 the Minister for Planning declared by order in the gazette, pursuant to Section 75B(1) of the Environmental Planning and Assessment Act 1979 that due to its regional planning significance the project (*"subdivision, including associated road works, of the Huntingwood West site"*) is a Major Project under Part 3A of the *Environmental Planning and Assessment Act 1979* and authorised the submission of a Concept Plan for the site under section 75M of the Environmental Planning and Assessment Act 1979. The proponent is able to submit a concept plan for subdivision for future employment uses as the project is deemed to be part permissible by virtue of "roads" being a permissible use within the 5(a) zone. This is provided by Section 75O(3) of the Act (see below).

4.3 Permissibility

The site is currently zoned 5(a) Special Uses - Corridor under Blacktown Local Environmental Plan 1988. A new planning regime is being prepared by the Department to reflect the intended future use for employment lands within the WSEH.

Section 75O(3) under Part 3A of the Act provides that the Minister cannot grant approval for the concept plan for a project that would be wholly prohibited under an environmental planning instrument. Section 75O(3) does not apply in this instance as the concept plan proposal is not wholly prohibited on this site due to its zoning under Blacktown LEP 1988. Consequently, the concept plan proposal can be approved by the Minister under Part 3A of the Act without needing to rezone the site for employment purposes beforehand.

4.4 Director General's Environmental Assessment Requirements

On 18 September 2006, the Director General issued environmental assessment requirements (DGEARs) pursuant to Section 75F of the EP & A Act. The key issues to be addressed in the DGEARs issued related to: subdivision layout and design; traffic generation & management; stormwater management and disposal; biodiversity and cultural heritage; bushfire risk assessment; hydrology and water management; utilities and infrastructure provision; transport and access; section 94 developer contributions/section 93 planning agreements; and community consultation.

4.5 Other relevant legislation and environmental planning instruments

Section 6 and **Appendix F** both set out the approval process, relevant consideration of legislation, environmental planning instruments and planning strategies as required under Part 3A of the EP&A Act.

5 CONSULTATION AND ISSUES RAISED

The Environmental Assessment Report (EA) was publicly exhibited and notified in accordance with the EP&A Act. Section 75H(3) of the EP & A Act requires that after the Environmental Assessment has been accepted by the Director General, the Director General must, in accordance with any guidelines published in the Gazette, make the environmental assessment publicly available for at least 30 days. The Director General has not published any specific guidelines in relation to the public exhibition of the application.

A "Test of Adequacy" was undertaken by the Department which determined that the matters contained in the DGRs were adequately addressed in the Environmental Assessment prior to public exhibition.

In accordance with Section 75H of the Act, the environmental assessment was publicly exhibited for a period of 30 days from 28 September 2006 to 27 October 2006 at the following locations:

- Department of Planning (Head Office) - Information Centre, 22 – 33 Bridge Street, Sydney
- Blacktown City Council – 62 Flushcombe Road, Blacktown

The EA was placed on the Department's website during the course of the exhibition period.

Local stakeholders within 1km of the site were informed of the concept plan proposal in writing and invited to make a written submission. Details of the concept plan proposal were placed in the public notices section of the local newspaper. The advertisement provided details of the proposal, exhibition locations and dates and how interested parties could make a submission. Government agencies, Blacktown City Council and other public authorities were also consulted.

In response to the exhibition period, the Department received a submission from Council, DEC, the RTA and 2 local stakeholders. A summary of submissions received is included at **Appendix D**.

A detailed report responding to these submissions, prepared by Landcom, was submitted to the Department on 1 December 2006 (included at **Appendix D**). A Preferred Project Report was subsequently lodged with the Department on 1 December 2006.

To fulfil the requirements of Section 75I Clause 2(b) this report includes advice provided by public authorities regarding the issues to be addressed by the proponent in the EA. These issues formed part of the key issues raised in the DGEARs. The Department has reviewed the EA, submissions to the preparation of the EA by public authorities, the submissions received from public authorities during the EA exhibition period and additional information provided by the proponent. Unless noted to the contrary below, the Department is satisfied that the responses provided by the proponent in their EA and the additional response to issues raised in submissions are reasonable.

6 ASSESSMENT

The Department has reviewed the EA and the preferred project report and considered advice from public authorities as well as issues raised in general submissions in accordance with Section 75I(2) of the Act. Consideration of each of the issues as they relate to the concept plan proposal is provided in **Section 6.2**.

Each relevant issue has been identified and duly considered followed by an explanation of how the proponent has sought to address the issue. Each subsection concludes with an explanation of how the Department has resolved the issue through the imposition of various modifications/ conditions of approval.

6.1 Director General's Report

The purpose of this submission is for the Director General to provide a report on the project to the Minister for the purposes of deciding whether or not to grant approval of the concept plan pursuant to Section 75O(2)(a) of the Act and project approval under Section 75J. Section 75N of the Act provides that the scope of the Director General's environmental assessment report for a concept plan is the same as with respect to approvals to carry out a project pursuant to Section 75I(2) under Part 3A of the Act.

Section 75I(2) sets out the scope of the Director General's report to the Minister. Each of the criteria set out therein have been addressed below, as follows:

- (a) a copy of the proponent's environmental assessment and any preferred project report; and

The proponent's EA is included at **Appendix E** while the preferred project report is set out for the Minister's consideration at **Appendix C** along with the Statement of Commitments at **Appendix B**.

- (b) any advice provided by public authorities on the project; and

All advice provided by public authorities on the project for the Minister's consideration is set out at **Appendix D**.

- (c) a copy of any report of a panel constituted under Section 75G in respect of the project; and

No independent hearing and assessment panel was undertaken in respect of this project.

- (d) a copy of or reference to the provisions of any State Environmental Planning Policy (SEPP) that substantially govern the carrying out of the project; and

A copy and brief assessment of each State Environmental Planning Policies that substantially govern the carrying out of the project is set out in **Appendix F**.

- (e) except in the case of a critical infrastructure project – a copy of or reference to the provisions of any environmental planning instrument that would (but for this Part) substantially govern the carrying out of the project and that have been taken into consideration in the environmental assessment of the project under this Division; and

An assessment of the development relative to the relevant environmental planning instruments is provided in **Appendix F**.

- (f) any environmental assessment undertaken by the Director General or other matter the Director General considers appropriate.

The environmental assessment of the project is this report in its entirety.

6.2 KEY ISSUES

The following section assesses each of the key issues associated with the proposal. Each relevant issue has been identified, followed by an explanation of how the proponent has sought to address the issue. Each subsection concludes with an explanation of how the issue has been resolved through the Departments recommended modifications/ conditions of approval or through the proponent's Statement of Commitments.

It is worth noting that the Statement of Commitments has been modified since the documentation was on public

exhibition and that a number of issues raised during the exhibition period have been addressed by way of the revised Statement of Commitments.

6.2.1 Traffic and Roads

Raised by

The Department, RTA and Council.

Consideration

A 'Transport Management and Accessibility Plan' (TMAP) has been developed for the Huntingwood West site by Maunsell (Appendix C, Vol. 2 of EA). The TMAP considers the strategic and transport context of the site, estimates the traffic demand and assesses the impact of the demand on surrounding transport networks.

Impact Assessment

The impact assessment within the TMAP considered the future traffic and transport scenarios and the impact of the Huntingwood West development on the local network and assesses potential improvements that may ameliorate the impact, particularly in relation to local intersections.

The TMAP compared Base Scenarios and Design Scenarios (with development) to determine the particular impacts of the development on the surrounding traffic and transport networks. As the Western Sydney Employment Hub includes ten key employment sites which may create around 36,000 jobs these developments will have a significant impact on the road and public transport networks in the vicinity of the site. Developments in the vicinity of the Huntingwood West site have been included in the Base Scenario impact assessment.

Traffic volumes

Traffic generation for the site during the AM Peak has been estimated as 15 vehicle trips per developable hectare in line with RTA Guidelines. As a result, a demand of 840 vehicle trips is estimated for the site in the morning peak hour upon full development. 85% of trips are expected to be made to the site and 15% from the site. A target of a 10% reduction in these predicted employee car trips (as the driver) has been set for the site, which reduces the expected generated vehicle trips to 727 during the AM peak hour.

A two lane road (one lane in each direction) will be sufficient to accommodate the estimated traffic generation for industrial site uses in the peak hour. The internal road network will be constructed to accommodate turning movements.

Proposed intersection locations

The land subdivision plan has been guided by advice from the Department of Planning seeking two access points for the Huntingwood West site:

- a four way intersection with the Great Western Highway, and
- connection to the existing Brabham Drive roundabout.

Both intersections have been tested using modelling software and it is shown that they will operate at an acceptable level - within capacity and without significant delay to drivers.

The proposed intersection on the Great Western Highway is located approximately 400m from the adjacent existing intersection at Doonside Road, and will not adversely affect the operation of that intersection. The RTA has given in principle support, subject to detailed design and modelling.

Likely impact on surrounding road network

The main access to the site via the existing Brabham Drive/Huntingwood Drive roundabout provides direct connectivity to the existing Huntingwood industrial site. A secondary access via the Great Western Highway redistributes turning traffic from the Doonside Road/Great Western Highway intersection to the new intersection. This will benefit through traffic on the surrounding road network by reducing delay for traffic using the Doonside Road/Great Western Highway intersection.

Overall the proposed intersection locations will link into the road network, providing integrated and efficient access through and around the site.

Pedestrians, cyclists and public transport

The site is serviced to some degree by both rail and buses. Rooty Hill and Doonside Stations are located to the north of the study area, providing access to the mainline rail system with fairly frequent services. The Blacktown

to Arndell Park bus route serves the nearby industrial zone. This route runs adjacent to the site along Brabham Drive.

Huntingwood West is located close to the regional road network which will assist the freight task for any future industrial land uses. There is good access to the local and regional cycle network. New links have been identified close to the site connecting to local facilities, such as schools, retail, leisure and transport. Cycle lockers are provided at stations for cyclists transferring to rail. A cycle path is proposed by Council to link the site with Doonside.

Council & RTA – technical issues

A number of technical issues have been raised by Council and the RTA regarding traffic modelling, intersection and road design and regional infrastructure. Council is concerned about the tight bends in the proposed road layout. A tight bend generally is not desirable especially for large articulated vehicles and B-Doubles as these vehicles find it difficult to negotiate. As articulated vehicles and B-Doubles service more and more industrial areas, it is expected that the articulated vehicles and B-Doubles will also service the Huntingwood West Precinct. All vehicles must be able to manoeuvre throughout the Precinct without cutting corners. Based on the above, Council does not support tight bends as proposed on the concept plan.

In addition to the above, the bends in roads also contribute to lack of frontage and limited access options for lots which are not only large but also have no alternative access. This is evident in the lot at the corner of the M4 and Brabham Drive that only has frontage to the bend on the local road.

It is also noted that a four way signalised intersection along Great Western Highway is proposed. As the RTA manages and approves all traffic signals in NSW, the RTA's acceptance to any proposed traffic signals is required.

With regard to access denial, this must be maintained not only to M4 and Great Western Highway, but also to Brabham Drive.

The Integral Energy Substation is shown as being serviced by right of way. This is undesirable. Integral Energy should be given its own battleaxe handle to avoid conflict/access issues over adjoining lots.

Resolution

The recommendations of the traffic study in the EA are reflected in the package of measures developed for the site together with the finding and implementation strategy. Key points of this package include:

- Workplace travel plans, to include measures such as car pools, marketing of public transport options, or discounts on cycle equipment.
- Infrastructure improvements to provide easy pedestrian and cyclist access to Doonside via a shared path and connections to existing shared paths such as the M7 cycleway.
- Public transport infrastructure with a minimum provision of a bus stop on Brabham Drive.
- Transport service improvements, including potential to divert a bus route past the site.
- Access to the site via an existing roundabout at Brabham Drive and a new intersection from the Great Western Highway.
- Intersection improvements at key locations.

As a comprehensive package of measures, this will meet the needs of employees and businesses at Huntingwood West, whilst encouraging a mode shift towards public transport.

Council & RTA – technical issues

Maunsell advises that *"at this stage, the plans are concepts and detailed designed will be carried out a later stage"*. As stated in the TMAP: *"At the detailed design stage, Austroads Turning Path Templates (2006) should be used to determine adequate swept paths for trucks that will serve the industrial site at Huntingwood West. A preliminary examination of the aerial photograph of Blacktown using the templates suggests that the existing Huntingwood estate has been designed to accommodate B-doubles and the Brabham Drive access roundabout will accommodate a B-double travelling between five and 15 kilometres per hour"*. The design is in concept form at this stage, and would be subject to detailed design approval. However, Landcom believes that the design is suitable for the proposed uses.

Landcom has been consulting the RTA extensively throughout the preparation of the Concept Plan and has gained the RTA's in-principle verbal support for the Great Western Highway intersection.

With regard to access denial, Landcom supports this view, with the exception of the Integral Energy substation. The substation will generate one trip every 3-4 weeks. On this basis, Council's Traffic Engineer gave Landcom verbal in-principle support to a left in / left out access to Brabham Drive, subject to a detailed assessment of the substation DA.

The Integral Energy lot, as discussed above, will be accessed from Brabham Drive. The proposed easement is to deliver electricity services to the Huntingwood West site, as this is not possible along Brabham Drive due to cabling restrictions. The easement is required under the proposed subdivision layout to gain access over the lot to the rear. If the future developer of the land wished to alter the subdivision pattern or road layout, consultation with Integral Energy would be required.

6.2.2 Developer Contributions and Environmental Offsets

Raised by

RTA, DEC and Council.

Consideration

Council have stipulated that any approval given to the concept plan for Huntingwood West should not preclude the ability for Council to levy contributions for infrastructure and services generated by development on the site. As a minimum, the proponent should be responsible for providing all on-site infrastructure and services, and any dedication to Council should be at no cost to Council.

The proposal involves the loss of 5.6ha of Shale Plains Woodland, which is considered to qualify as part of the endangered ecological community Cumberland Plain Woodland as scheduled under the *Threatened Species Conservation Act 1995*. This community occurs on the site as a number of remnants with the largest being 4ha in size. While DEC acknowledges the benefits of investing resources in protecting larger vegetation remnants and building corridor connections, it is concerned at the lack of detail and relatively low level of contributions proposed for this project.

The Statement of Commitments for the Concept Plan provides for *"a monetary contribution to the Parklands Trust to offset the removal of 5.6ha of Cumberland Plain Woodland within Huntingwood West"*. There are limited details provided in the *"Strategic Offset Directions"* report prepared by *Eco Logical* on this proposal including what the monetary amount will be, what it will be allocated to and in what areas of the Parkland it will be used for.

Whilst the offset provides a 'like for like' offset and would enhance adjoining Cumberland Plain vegetation that forms part of the regional Parklands, DEC have advised that the proposed ratio of 1:1 is not in accordance with the offsetting principle that it should be greater than the proposed loss. A ratio of at least 2:1 or greater is usually required to demonstrate that there will be no net loss in biodiversity terms. For revegetation proposals the ratio should be higher again given the inherent risks involved (such as plant loss, due to fire/drought, difficulty in replicating cleared vegetation, etc).

Resolution

Any approval given to the concept plan for Huntingwood West will not preclude the ability for Council to levy contributions for infrastructure and services generated by development on the site in future project/development applications. The revised Statement of Commitments outlines the nature and extent of developer contributions - these include roadways, drainage facilities, and monetary contribution to the RTA. Landcom has revised the Statement of Commitments to confirm that dedication is to be at no cost to Council, and that the applicant shall be responsible for providing all on site infrastructure and services at their own cost.

Further clarification on how money will be managed will need to be negotiated between DoP, Landcom and the Parklands Trust.

Landcom have advised that earlier meetings with DEC indicated that a ratio of at least 1:1 should be aimed for, given the Conservation Strategy that is being achieved over the entire Parklands. Further clarification on how offsets will be delivered to ensure that there will be no net loss will be outlined in the Conservation Strategy and Environmental Response Report being prepared for the Parklands.

No ratio to be used for offsetting 5.6 ha has yet been agreed upon with DEC. However, it was agreed with DEC that the offset ratio will be based on a strategic conservation strategy for the Parklands and Doonside. The offsets will aim to retain and protect the highest quality Cumberland Plain Woodland. This would include restoration and enhancement in particular locations in accordance with a strategic conservation strategy.

6.2.3 Stormwater Management and Water Quality

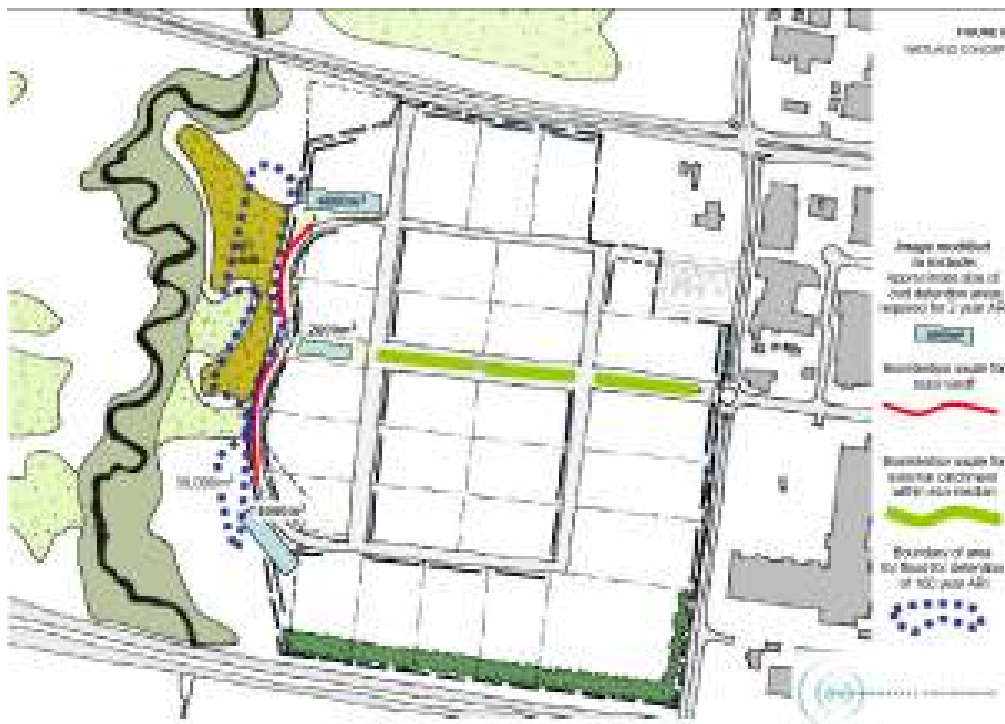
Raised by

DEC and Council.

Consideration

The concept plan proposes a number of water sensitive urban design aspects to address urban runoff from the proposed subdivision, including a **constructed wetland and eco-median** (see diagram below). The wetland is to adjoin Eastern Creek and be located with the Western Sydney Parklands on public land rather than the development site, creating issues concerning ownership and maintenance responsibility. Council will not accept any responsibility for this wetland.

Constructed Wetland concept



Resolution

The wetland basin is proposed under the conceptual design work being undertaken for the Parklands precinct. A wetland area in this location is considered to be a benefit for the Parklands in terms of provision of amenity to provide a transition between the new employment area and Eastern Creek. The Department of Planning/Parklands Trust has been consulted and informed during the development of this configuration of the wetland and endorsed the proposed strategy. Maintenance responsibility will rest with the Parklands Trust for the wetland.

6.2.4 Ecological Assessment

Raised by

Council.

Consideration

Notwithstanding the proponent's intent to make a monetary contribution to the Parklands Trust for the removal of 5.6 hectares of Cumberland Plain Woodland, Council is of the opinion that this does not negate the need for an assessment against the provisions of the *Threatened Species Conservation Act 1995*, and the *Environment Protection Biodiversity Conservation Act 1999*. There is no evidence that such assessment has been undertaken.

Resolution

The Concept Plan for Huntingwood West and accompanying Environmental Assessment falls under Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act). Environmental assessment requirements are

outlined in Section 75A of Part 3A. Under this section, there is no requirement for assessment against the provisions of the *Threatened Species Conservation Act 1995*.

Environmental assessment is only required against:

- any guidelines in the Gazette with respect to environmental assessments; and
- the environmental assessment requirements of the Director General, outlined in the Director General's Requirements.

The Environmental Assessment for Huntingwood West has complied with the *Draft Guidelines for Threatened Species Assessment* released by the Department of Environment and Conservation (DEC) in July 2005, including preliminary assessment, evaluation of impacts, avoidance, mitigation and offsets and justification of the preferred option. Evidence is provided in Section 4.2 of the Environmental Assessment and the Strategic Offsets Directions in Appendix D.

Further evidence of the assessment of the ecological values on Huntingwood West is also present in Eco Logical Australia's *Western Sydney Parklands Conservation Significance Assessment* (Eco Logical Australia Pty Ltd 2006) and *Revised Draft Report, Land and vegetation management plan for three sections of the Western Sydney Regional Parklands* (Ian Perkins Consultancy Services 2005).

The Environmental Assessment for Huntingwood West has also complied with the Key Assessment Requirements for Natural Resources in the Director General's Requirements, including assessment of potential impacts on water quality, aquatic ecosystems, and native flora and fauna, including threatened species.

In regard to the provision of the *Environment Protection Biodiversity Conservation Act 1999*, when a person proposes to take an action (project, development, undertaking, activity, or series of activities) that they believe may need approval under the EPBC Act, they must refer the proposal to the Commonwealth Environment Minister. Landcom will refer the entire Bungarribee Development Precinct project to the Commonwealth Minister for the Environment.

6.2.5 Retention of Significant Trees

Raised by

DEC.

Consideration

The Concept Plan defines and maps significant trees as those being larger than 30cm in diameter (Figure 13 in Volume 1 Concept Plan). These are to be retained within buffers, setbacks and in road reservations and drainage lines "wherever possible (subject to development constraints including filling)." The proposed street layout and subdivision (Dwg No. SK11B) indicates that there will be few trees retained including where the 'eco-median' will be located. Also, the construction of the roadways and eco-median will in themselves result in tree damage and loss. Within the individual lots there will be limited ability to retain trees within setback areas and also if sites require levelling and raising above flood levels.

The Visual and Landscape Assessment by RLA provided a number of guidelines for managing 'scenic resources' at Huntingwood West. These included:

e) **All vegetation remnants**, especially that within the eastern part of the site and within the Eastern Creek corridor, are **to be considered for retention** and enhancement with enrichment planting and regeneration techniques, and

f) **Existing stands of vegetation should remain** amongst future development areas. The vegetation should provide visual separation between buildings and structures as well as softening the appearance of larger industrial development.

The Development Design Controls (Vol. 1 Appendix C) require a maximum site coverage of 60% unless it can be demonstrated to the satisfaction of Council that greater site coverage will not adversely impact upon amenity of the streetscape or adjoining allotments. They also require one tree per 25 sqm and certain site setbacks including landscaped car parking areas. In addition, they include the aim to retain and integrate existing trees. These controls and guidelines are supported but require greater consideration at design stage.

Resolution

EcoLogical Australia has mapped all significant trees over 30cm DBH. The Development Design Controls requires these to be retained where possible. A tree survey should be undertaken as part of the Landscape Strategy (as proposed in the Development Design Controls) prior to subdivision approval that identifies, describes

and assesses each significant tree (i.e. over 30 cm DBH). All trees identified are to be considered for retention at development stage.

6.2.6 Water Sensitive Urban Design (WSUD)

Raised by

Council.

Consideration

Generally, Council supports in principle the concept plan and Water Sensitive Urban Design (WSUD) Strategy provided for stormwater management. However, the following comments are provided:

- a) The Blacktown City Council OSD (specifications) manual only deals with the 1:100 yr event.
- b) Council will apply its Stormwater Quality Control Plan to individual lot developments as Development Applications are submitted over the course of the estate's development. It is the responsibility of individuals to control pollution runoff from their site.
- c) The Huntingwood West Precinct will require a performance-monitoring program to be developed that demonstrates that the WSUD infrastructure is meeting its design specifications. This is to utilise auto-logging sample collection up and downstream of the WSUD infrastructure and be tailored to cater for the changing percentage of development within the estate. Monitoring is to run concurrently with the maintenance period, and alterations should be made to infrastructure (not meeting performance specifications) prior to handover to Council.

Resolution

Stormwater pollution resulting from rainfall onto impervious surfaces has been addressed in the WSUD strategy through the combination of bio-swailes, gross pollutant traps, precinct ponds and the regional wetland. We have also identified the option to include street tree bioretention system along all streets. These will be adequate to meet Council's stormwater quality objectives.

In relation to the management of industrial pollution associated with the activities of individual business, the Huntingwood West WSUD Strategy has included Building Design Guidelines to ensure that pollutants from work areas does not enter the stormwater drains. The measures recommended such as roofing work areas, directing washdown areas to storage (sewer) and controlling activities in areas connected to stormwater drains would address the priority pollutants (litter, hydrocarbons etc, and fine sediment).

The importance of ensuring that the WSUD infrastructure meets its design specifications is acknowledged by the proponent, however the requirement should be to monitor hydraulic operation of these systems rather than water quality sampling and analysis. Given that the treatment measures will be designed and constructed in accordance to guidelines published by lead research organisations in Australia, monitoring the hydraulic operation of these system over time to validate their operation is in accordance to that recommended by these guidelines should be sufficient to reasonably infer that the intended water quality outcomes has been achieved.

Water quality monitoring is expensive and requires expertise that would best be left with lead research organisations in Australia. According to a recent Cooperative Research Centre for Catchment Hydrology publication, at least 50 storm events must be monitored, with sampling over the entire event duration in order to get meaningful results on the performance of these systems. The cost of such monitoring is prohibitive at every location where devices are built. Rather, extensive monitoring and research should be undertaken at selected locations, with the results influencing the future design of systems constructed.

Monitoring of these facilities should be limited to the physical and botanical character and their hydraulic operation. A construction checklist would ensure that the specified planting densities and critical design parameters have been met.

Appropriate commitments to the future monitoring of stormwater have been included in the revised Statement of Commitments.

6.2.7 Future Zoning & Land Uses

Raised by

Council and local stakeholders.

Consideration

Council and local stakeholders made comment on the desired future zoning of the site and appropriate permissible land uses. Local stakeholders are seeking to have an increased retail presence in the WSEH, supporting the more traditional warehousing/light industrial land uses, while Council is seeking to establish “an automotive and motor sport industry cluster” associated with the existing motor sport precinct at Eastern Creek.

To facilitate this objective, Council has requested that consideration of future zoning include an expansion of permissible uses on part of the site fronting Brabham Drive to permit vehicle showrooms as defined in the *Standard Instrument (Local Environmental Plans) Order 2006* outlined below:

“vehicle showroom means a building or place used for the display or sale of motor vehicles, caravans, boats, trailers, agricultural machinery and the like, whether or not accessories are sold or displayed there.”

This site specific provision to permit vehicle showrooms is requested on part of the site bounded by the eco median, Brabham Drive, the M4 Motorway, and the internal access road.

Resolution

The comments from Council and local stakeholders are not directly relevant to the concept plan the subject of this report, however they will inform the future rezoning of the Hub through the SSS process. The EA references to future suggested zonings will also inform this process.

6.2.8 Aboriginal Heritage

Raised by

DEC and Council.

Consideration

Two surface archaeological sites (WSP/13 and WSP/15) and one area of Potential Archaeological Deposit (PAD WSP5) have been recorded within the Huntingwood West. The development as proposed in the Huntingwood West Concept Plan will directly impact on both of these sites and the identified PAD.

The concept plan provides for salvage excavation works within the Huntingwood West Parcel and states that further archaeological investigation is not required as the concept plan being prepared for the Bungarribee precinct of the Western Sydney Parklands has identified areas which are to provide a conservation outcome for indigenous heritage.

DGRs issued for the concept plan required consultation with relevant Aboriginal stakeholders. The submission does not document that this has been undertaken.

Resolution

Using a ‘whole of development’ approach, sites and areas of PAD in the Parklands and the Doonside Parcel are considered to have more potential for containing intact archaeological deposit in higher value landscapes. Salvage excavation will be conducted in these areas to provide archaeological context for the Conservation Areas and mitigate against the destruction of land with archaeological potential in the Huntingwood West parcel.

It is proposed that the Bungarribee precinct of the Western Sydney Parklands will have an Indigenous heritage conservation strategy and outcome. This strategy, based on scientific and cultural values, will identify a conservation zone that encompasses a range of representative landscapes with the best conservation potential. It is anticipated that this conservation zone will be centred on the riparian zone of Eastern Creek north of the Great Western Highway. This represents the most meaningful management outcome and has the result that land which falls outside the conservation zone should be considered developable. The developable lands should be managed on the basis of the sensitivity mapping and the defined management principles.

The Indigenous Heritage Impact Statement included in Volume 3 of the application clearly states on page 2 that four Aboriginal groups have been consulted and involved in the survey work over the entire Bungarribee Development Precinct. Furthermore, the Aboriginal groups have endorsed the management recommendations proposed for the area.

7 CONCLUSION

- 7.1. The Department has reviewed the environmental assessment and the preferred project report and duly considered advice from public authorities as well as issues raised in general submissions in accordance with Section 75I(2) of the Act. All the relevant environmental issues associated with the proposal have been extensively assessed.
- 7.2. In balancing the State significant planning outcomes with the issues raised in the body of this report, the Department is of the view that the proponent has satisfactorily mitigated the environmental impacts arising from the subdivision of the Huntingwood West site for employment generating uses. In assessing the proposal, the Department has resolved any outstanding environmental issues through recommended modifications.
- 7.3. The proponent has committed (through Statements of Commitment) to a number of measures to ensure the development proceeds smoothly and does not adversely impact on local amenity and landscapes adjacent on the site. The Department is recommending further modifications to the concept plan to augment commitments made by the proponent.
- 7.4. Recommended modifications to the Concept Plan are provided at **Appendix A**. The reasons for the imposition of modification are to encourage good urban design, maintain the amenity of the local area and adequately mitigate the environmental impact of the development.

8 RECOMMENDATION

It is recommended that the Minister for Planning:

- a) **consider** the findings and recommendations of this report.
- b) **grant** approval for the concept plan pursuant to s.75O(1) by signing the Instrument of Approval at **Appendix A**.
- c) **Authorise** the Department to carry out post-determination notification.
- d) **Note** that the proposed listing of the site within Schedule 3 of the Major Projects SEPP will be pursued separately, however this does not preclude the Minister from approving the concept plan for subdivision prior to the SEPP amendment.

Endorsed by:

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