

Your ref: SSD-29668067 File no: MC-22-00003

13 July 2022

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

Recipient Delivery patrick.copas@dpie.nsw.gov.au.

Attention: Patrick Copas

Dear Mr Copas,

SSD-29668067 - Request for advice re: South Street Warehousing Estate – at 311 South Street, Marsden Park

Thank you for your correspondence dated 7 June 2022 requesting our advice on the Environmental Impact Statement for the proposed 'warehousing estate' at 311 South Street, Marsden Park which is a State Significant Development proposal under section 4.36 of the Environmental Planning and Assessment Act 1979.

The submitted Environmental Impact Statement has been reviewed by our officers and we object to the proposal due to issues relating to engineering, traffic, recreation park and design, biodiversity and building design. These issues are detailed in the 2 attachments to this letter.

We request that all the matters as detailed in the 2 attachments to this letter are comprehensively addressed and the information referred back to Council for further consideration and conditions before any determination is made by the Department.

If you would like to discuss this matter further, please contact Judith Portelli, our Manager Development Assessment, on 9839 6228.

Yours faithfully

Peter Conroy Director City Planning and Development

Connect - Create - Celebrate

Council Chambers - 62 Flushcombe Road - Blacktown NSW 2148 Telephone: (02) 9839 6000 - DX 8117 Blacktown Email: council@blacktown.nsw.gov.au - Website: www.blacktown.nsw.gov.au All correspondence to: The Chief Executive Officer - PO Box 63 - Blacktown NSW 2148

Blacktown City Council's submission to SSD 29668067-South Street Warehousing Estate – at 311 South Street, Marsden Park

1. Engineering issues

Development Engineer

- a. An engineering plans/stormwater concept plans are to demonstrate how the additional buildings will connect into the existing stormwater network within the adjoining public road via gravity fed system into the recently constructed downstream basin. Ensure up to date as-built survey information are obtained.
- b. The development shall be designed to allow for the future roundabout in the south east corner of the site as per the Indicative Layout Plan.
- c. The location of the service vehicle driveway shall be suitably located away from the future roundabout mentioned in the above point.
- d. The development shall be designed in accordance with AS2890 parts 1,2 and 6.
- e. Permanent on-lot stormwater quality measures are required for the new development footprint. Stormwater quality measures are to meet the requirements of Part J under the Council's DCP. This requirement may possibly be addressed through a Voluntary Contribution for stormwater quality treatment offsite as per DCP Part J subject to concurrence by Council's Drainage and Section 7.11 Team.
- f. The application shall be designed to complement the as-built levels of the half road construction (Duckworth Place), adjoining development to the east of subject site, surrounding infrastructures including recently constructed downstream regional basin and the existing and ultimate design levels of South Street. An up-to-date site survey information may need to be carried out for recently completed basin work.
- g. The collector road design (Duckworth Place) shall be amended to comply with Figure 5.3 Typical Industrial collector road cross section (24m wide) in Schedule 3 Marsden Park Industrial Precinct.
- h. Height details of the retaining walls shall be revised to be consistent between the plan drawings and section details.
- Bio-retention basins will require access ramps for maintenance and repair inside the basin. As such, suitable access ramps for servicing vehicles will need to be provided. These shall be designed in accordance with AS2890 part 2 for the largest service vehicle.
- j. Typical overflow weir detail shall be amended to be suitable for the proposed depth of the bio-retention basins.

Drainage Engineer



- The CIVIL ENGINEERING REPORT INCORPORATING WATER CYCLE MANAGEMENT STRATEGY Project No. Co14243.01 by Costin Roe Consulting Rev B is to be amended to address:
 - a. On page 21 reference for tertiary treatment is to syphon activated filtration (cartridges). In fact, this treatment is through bioretention.
 - b. On page 23 reference is made to the timing of Basin L1.1. This basin construction has been delayed and will not commence until late 2022. Consequently, depending upon the timing of this project that may be consent conditions limiting operation until the practical completion of this basin.
 - c. At Section 6.4 Stormwater Harvesting on page 32 the second irrigation area refers to Tank 1 when it likely should refer to Tank 2.
 - d. For area of irrigation confirmation that the 3300 m² proposed for each tank only nominates planter beds and not lawn areas.
- Amended Landscape Plans are required from Site Image Drawing Number 0015 (C) that addresses the planting density and pot size for the bioretention species to be in accordance with Sheet 12 of Council's Water Sustainable Urban Design standard drawings.
- 3. Amended MUSIC modelling are required from Costin Roe Consulting Project No. Co14243.01 to address the following requirements:
 - a. The MUSIC model is to be provided digitally for assessment by Council. Currently not provided.
 - b. On the snapshot in the Costin Roe Report one of the links from CP4 to the bioretention basin 2 is missing which will likely affect performance.
 - c. Review the landscape water usage for the Rain Water Tank as detailed above.
 - d. Separate the rainwater tank into two.
 - e. Review the area of the available bioretention filter media area for use in MUSIC based on the requirements of section 11.8.4 of the Water Sustainable Urban Design developer handbook for solar access to the plants. Shadows form the adjacent buildings and retaining walls are to be assessed. Include details in the report.
 - f. Provide two separate and additional MUSIC models (pre and post) to demonstrate that the Stream Erosion Index (SEI) is less than 3.5 based on the technique in Chapter 13 of Council's Water Sustainable Urban Design developer handbook available on Council's website. The pre-development is to consider a vacant pervious block. Provide all calculations used to determine Q_{critical}.
- 4. Amended drainage Plans are required from Costin Roe Consulting Project No. Co14243.01 to address the following requirements:



- a. Provide internal pipe long sections with 5% AEP HGL at least for the major lines. The head loss for the splitter pit from the 1050 mm pipe via the 450 pipe to Basin 1 needs to be considered.
- b. On drawing SSDDA40 (H):
 - i. Number all pits.
 - ii. The sizing of the pipes in and out of the bio basins is suspect. For bio basin 1 there are two 450 mm and one 525 mm pipes into the system but only a single 450 mm pipe out. Outflow capacity is to be maintained assuming the basin is full.
 - iii. The outlet pipe changes from 1050 to 1200 mm where the outflow from Basin 1 joins. It is unclear whether the 1200 mm is sized due to change of grade or allows for the additional flows from the basin even though not nominated. Review, noting the pipe in South Street likely to be lifted to meet requirements from other sections of Council.
 - iv. The sizing of the pipes in and out of the bio basins is suspect. For bio basin 2 there is a 300 mm and a 750 mm pipes into the system but only a single 750 mm pipe out.
- c. On drawing SSDDA41 (C) there are too many lines to clearly understand the main catchment breakup. Shade catchments 1 and 2 and the bypass using different colours. Notate and identify which bio basin is which.
- d. On drawing SSDDA46 (C) delete the references to dissipaters to the bioretention basin. All inlets to the basins must comply with Detail 10 of WSUD standard drawing A(BS)175M.Provide detail.
- e. On drawing SSDDA47 (B).
 - The "Typical Bioretention Detail" is incorrect. The filter profile is to be as per Detail 2 of Council's Water Sustainable Urban Design standard drawing A(BS)175M. Note subsoil pipes are 150 mm slotted PVC laid flat.
 - ii. Delete the "Temporary Bio-Retention Protection Detail" as this is not required where the building works will be completed at the same time as the basin. If the building works are to be staged relative to the basins it shall be in accordance with Sheet 14 of Council's WSUD standard drawing A(BS)175M.
 - iii. It is unclear whether the "Typical Overflow Weir Detail" actually applies. A pipe overflow is shown on the plan SSDDA40 (H). All pipe outlets from the basins must comply with Detail 12 of Council's Water Sustainable Urban Design standard drawing A(BS)175M.
 - iv. Delete the "Basin Inlet Pit BIP" as incorrect. All inlets to the basins must comply with Detail 10 of Water Sustainable Urban Design standard drawing A(BS)175M.



- v. It is unclear how the "Typical Detail Basin Clay Core and Embankment" actually applies as this would typically be used with a detention basin and contracts the "Typical Overflow Weir Detail". Only one or perhaps neither should apply.
- vi. There are errors in the Bioretention Notes.
 - 1. The permeability noted is to be 250 mm/hr.
 - 2. Delete the note regarding partial installation as does not apply in this case.
 - 3. Delete the reference to amelioration of the top 100 mm of filter media and addition of fertiliser.
- vii. Delete the flow spreader detail.
- f. A detailed plan view at a large scale is required for each bioretention basin. This will include the provision of permeable concrete pipes and upflow pits generally as per Plan 1 on Sheet 3 of Council's WSUD standard drawing A(BS)175M. Due to multiple inlet pipes a variation of the standard arrangement will be required, but the principles of pit location and equal distribution of flows across the basin is required. E.g. an interconnection with the inflow pits may be required and some inflow points may combine to use the same upflow pits. Show the subsoil layout.

Section 7.11 Infrastructure (refer to Attachment 2)

• The timing associated with the delivery of works need to be addressed. In particular, the Interim Stormwater Strategy should be revised to demonstrate how the first 42 mm of runoff will be 'captured and diverted', in the event that the downstream basin (L1.1) and diversion pipe (L4.1) has not yet been constructed.

The Interim Stormwater Strategy will need to ensure that the first 42mm of runoff across all developed areas is captured within a retention basin (or tank) and diverted away from the protected conversation area. The Interim Stormwater Strategy needs to be consistent with the "Protecting Little Creek" Stormwater Management Strategy Report (Bligh Tanner, 2015). The corresponding size of the detention basin (or tank) needs to cater for both detention and retention volumes.

- Trunk Drainage 3600x900 RCBC is to be extended at 1% minimum grade to allow connection for proposed 1350dia pipe (approximate invert 35.25). Existing 825dia pipe and headwall are to be removed. Temporary head wall is to be constructed to match culvert invert.
- Proposed 1350dia pipe must be must comply with minimum cover requirements in accordance with *Blacktown City Council-Engineering Guide for Development* for both existing and ultimate South Street configurations.
- Approximate Tail water levels at proposed pit 6 should be:
 - o 50%AEP RL 35.75
 - o 20%AEP RL 36.35
 - o 10%AEP RL 36.60
 - o 5% AEP RL 36.95
 - o **1%AEP RL 37.15**



- Proposed pits (Pit1 Pit6) shall allow for future extension to match future South Street road levels
- Proposed 1350dia pipe to have sufficient clearance from 132Kv feeder. Transgrid approval will be required
- Proposed alignment including but not limited to sag location along Duckworth Street to match existing half road construction.
- Proposed stormwater pit and pipe system shall be connected to the existing stormwater infrastructure
- Proposed Bioretention basin retaining wall heights (4.1m high max) are inconsistent with details (2.0m high max)
- Proposed construction is within TransGrid Easement. TransGrid approval will be required
- Proposed finished surface levels adjacent to South Street to be intergraded with South Street in both existing and ultimate South Street configurations.
- Proposed primary truck access to be integrated with future Indicative Layout Plan road. The Indicative Layout Plan indicates future 4-way roundabout. Private truck access should be clear of roundabout intersection.

2. Traffic issues

- a. The proposed car entry/exit at the T-intersection opposite Delarue Street is prohibited for a commercial driveway in accordance with AS2890.1:2004 and must be relocated.
- b. The proposed shared driveway for heavy vehicles and passenger vehicles located on the southern boundary of the site should be separated.

3. Recreation Park and Design issues

- a. No walls or inaccessible level change is permitted at the interface of development, adjacent roads, public open space and drainage land:
 - The proposed retaining walls and batters will impact on connectivity and aesthetics.
- b. Verge improvements:
 - Due to the visual impact of the proposed development, and the adjoining residential zoning, the provision of verge improvements along South Street and the future collector road are required. This is to include accessible footpaths and street trees.
 - Please also consider that Transport for NSW have prepared preliminary drawings for South Street, indicating a 2.5m shared path within a 4.5m verge on both sides of the road.
- c. Street trees:



- At the time of planting, street trees shall have a minimum container size of 75L
- Street trees shall be planted at a rate of one (1) tree per six (6) lineal metres of street frontage, even in cases where a site has more than one street frontage. Street tree planning shall be consistent with Council's Street Tree Masterplan and species lists
- d. Vegetation:
 - In addition to street trees, the provision of screening vegetation and trees within the project lot boundary should be considered to reduce visual impact on adjoining residential zoning is required.
- e. Carparks:
 - Open car parking areas should be landscaped to reduce the impact of hard paving. Established tall trees with wide-spreading foliage provide desirable shade and reduce the effects of heat in open car parking areas at a ratio of one (1) tree per three (3) carparks at minimum container size of 45L at time of planting.
- f. Transmission line open space
 - Consider the design of the transmission easement space, its future linkage with the RE1 zoning to the north, and future connectivity opportunities that this easement may provide to future residents.

4. Biodiversity issues

• An Arboricultural Assessment Report is required.

The arborist is to work with the applicant to determine whether any trees can be retained as part of this development. The applicant is requested to look at what measures they are going to use to retain existing trees on site, located notably in this case at the boundaries with adjoining lots and providing habitat to local native parrots. The report must also cover how the trees on neighbouring lots will be protected from impact during the works.

• A Biodiversity Management Plan (BMP) is required.

This is to comprise of a detailed site plan and an accompanying report in a legible format prepared by a person who has qualifications and experience in respect of ecology, to be submitted by the proponent for Council's consideration. The BMP is to relate to the land within the proposal Lots and must contain full details of the actions proposed to be taken with respect to the management of fauna during the course of carrying out the development. The BMP is to be consistent with the NSW Department of Planning, Industry and Environment "Code of Practice for injured, sick and orphaned protected fauna" 2011 (the Code). It must include the following:

- Biodiversity management strategies for pre-construction, construction and post construction activities including environmental control measures for the pre-clearing process.
- A fauna rescue and release procedure. A licensed/wildlife carer or ecologist will be required on site as a fauna handler ('Rescuer' under the Code) during tree removal works including the dead trees at the rear of the property which are currently providing hollows for native parrots.



- a release site within 100m of the site is to be nominated by the Project Ecologist prior to clearing
- All identified tree hollows in living and dead trees proposed to be removed on site, are to be salvaged and placed in retained or nearby bushland areas under the direction of an ecologist to Council's satisfaction. For all tree hollows, not able to be salvaged, they are to be replaced with nest boxes or artificial hollows with three nest boxes/artificial hollows for every one hollow removed.
- A procedure for controlling the introduction and spreading of weeds and pathogens, including hygiene protocols and the arrangements for monitoring;
- A Dam Dewatering Plan is required for any of the three on-site dams proposed to be removed for the proposal. This is to be submitted to Council's Natural Areas team for approval.

The Dam Dewatering Plan is to outline how water on the site will be managed during discharge and must include the requirement for a suitably qualified ecologist to be present during dam dewatering. It must include:

- the proposed relocation sites for native fauna; Identification of the licence details required under the Fisheries Management Act 1994 and / or the Biodiversity Conservation Act 2016;
- methods to prevent injury to fauna during pumping of water from the dam;
- details of how exotic pest species will be humanely euthanised in a manner consistent with the Prevention of Cruelty to Animals Act 1979;
- methods for disposing of dam water and preventing the spread of carp eggs, juvenile pest species or eggs;
- details of the appropriate timing (season) for dewatering e.g., not while the black swans currently utilising the dam are nesting or rearing chicks; and
- details on reporting of actions undertaken with tallies of fauna removed from the dam with details of their relocation destination (or destruction).

Within 7 days of the works, the aquatic ecologist is to provide a report on the works, to be provided to Council through the Natural Areas Team.

5. Building design issues

g. The materials schedule nominated dark materials to the majority of the facades. It is recommended that lighter materials are used to reduce the impacts of urban heat island effects.







LEGEND:	
LEVELS DATUM IS	AHD.
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	- SGGP, SINGLE GRATED GULLY PIT
	- SJP, SEALED JUNCTION PIT
	- DRAINAGE LINE
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RL 4555	- BOW, BOTTOM OF WALL



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PRECISION COMMUNICATION ACCOUNTABILITY

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this plan have been constructed generally in accordance with the Approved Engineering Design Plans, Titled "The Bathla Group, Lot 30 South Street, Construction Certificate" Project No.: 16-49, Retrision 'G' Drawing Sheets C-000 to C-805 inclusive dated 17/04/2020 prepared by Orion Consulting Engineers, with Da-16-04983, CC-19- 01397 issued by "Blacktown City Council" and Construction Certificate No. 1517, 15888 & 15548 issued by "Land Development Certificates"
Name: M.J. ASLAN
Signature: You
Capacity: Senior Civil Engineer
BE, MEngs, MIEAust, CPEng, NER APEC Engineer IntPE (Aus)
Date: 18/01/2021
Contact No.: (02) 9636 2465
KAGARERS ENGLARERS ENGLARERS ENGLARERS Chartered Professional Engineer Membership No. 166721

"I hereby certify that engineering works shown on





FOR CONSTRUCTION CERTIFICATE

LOT 30 SOUTH STREET, MARSDEN PARK ROAD & DRAINAGE DESIGN ROAD LONG SECTIONS SHEET 01 OF 03

Project No.
16-49
Milestone
CC
Plan
301
Revision
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WORK AS EXECUTED