Your ref: SSD-41372302
File no: MC-22-00008

9 November 2022

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

Recipient Delivery Tuongvi.Doan@dpie.nsw.gov.au

Attention: Tuong Vi Doan

Dear Sir/Madam

SSD-41372302 - Notification of exhibition of a State Significant Development Application for Marsden Park High School and Melonba Primary School located at the corner of Elara Boulevarde and Kaluta Avenue, Melonba

Thank you for your correspondence dated 13 October 2022 requesting our comments on the above State Significant Development proposal.

The applicant's Environmental Impact Assessment and supporting documents have been reviewed by Council officers and we object to the proposal in its current form. Council officers have listed a number of issues that need to be addressed as outlined in the attachment to this letter.

Council therefore requests that these matters be comprehensively addressed and returned back to Council for further comment and consideration before any determination of this application 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

Blacktown City Council's submission to SSD-41372302

1. Planning issues

a. The Blacktown City Council Growth Centre Precincts Development Control Plan 2010 car parking rates for educational establishments applies to the proposal. The car parking rates are determined by the proposed number of staff, number of visitors, number of primary and secondary school students as well as the number of Year 12 students, which in this proposal is as follows:

- Students: 3000
- Year 12 students: 300
- Staff: 219

Based on this number of students and staff, the Blacktown City Council Growth Centre Precincts Development Control Plan 2010 car parking rates would require the following number of car parking spaces:

- Visitors: 30
- Year 12 students: 60
- Staff: 219

A total of 309 car parking spaces are therefore required. However, only 142 parking spaces are proposed which represents a shortfall of 167 car parking spaces. This significant departure from the required parking rate is not acceptable. It is acknowledged that Council noted at the Pre-Application Meeting held on 25 July 2022 that we would object only if the provision of parking does not at least comply with the requirements for staff and for the component of the students in Year 12. By subtracting the 30 visitor parking spaces, the shortfall is still 137 parking spaces.

Additional parking spaces could be created by providing either a basement carpark below or an additional elevated parking level above the proposed carpark to address the shortfall of parking spaces.

b. Additional information is requested regarding the effectiveness of the proposed passive design elements to manage current and future heatwaves in Melonba and surrounding suburbs.

c. Solar panels are only provided on a small portion of the proposed roof area across the development. Consideration should be given to providing additional solar panels on the roof across the entire development site to utilise the available space, as sustainable development principles are encouraged. Additional solar panels will also support additional cooling measures such as air conditioning units if required.

d. Council would like to raise the character of the area as a matter for the Department to consider in its determination of the proposal. Whilst this is not necessarily a reason for objection, the proposed school is surrounded by low density residential areas with majority double storey dwellings. The proposed school buildings are bulky triple storey buildings that exceed the 9 m height limit applicable to the site. There is also mostly no building separation between the Blocks to accommodate

pedestrian circulation. The school buildings would therefore change the character of the area.

2. Development Engineering issues

a. There appears to be boundary adjustment along Swallowtail Street and Kaluta Avenue for the new indented on-street parallel parking spaces.

b. The proposal to remove and not replacing the affected stormwater kerb inlet pits along Swallowtail Street is not accepted. The same provision needs along Kaluta Avenue needs to be made, that is, changing the kerb inlet pits to a double butterfly gated pit subject to satisfactory analysis to demonstrate the change does not adversely impact on the inlet capacity of these pits and pavement design. This will need to be provided on engineering plans for assessment.

c. No civil engineering plan as noted in the architectural plans was located in the submission. Please submit the civil as this may address points a and b above.

3. Drainage issues

a. The drainage system for the proposed development including onsite stormwater detention, rainwater tank (i.e. water conservation), Stormfilter System (i.e. water quality), and flooding are to be designed in accordance with Council's Water Sensitive Urban Design Developer Handbook 2020, Engineering Guide for Development 2005 and Council's Water Sensitive Urban Design Standard Drawings.

b. Please submit the DRAINS and Model for Urban Stormwater Improvement Conceptualisation electronically for review.

c. Engineering Plans by TTW (dated 16 September 2022) are to be amended to include the following:

- All OceanGuards are to be clearly notated as "200 micron OceanGuards". Provide a pit schedule clearly identifying pits with and number of OceanGuards.
- Provide an onsite stormwater detention catchment plan demonstrating which areas drain to the onsite stormwater detention and areas bypassing. Note that a 15% maximum site catchment bypass is permitted for the onsite stormwater detention tank.
- Provide a Model for Urban Stormwater Improvement Conceptualisation catchment plan that shows both the land use and the areas contributing to each specific device. To make this more understandable it may be easier in many cases to split these into two separate plans. Include all bypassing catchments. Ensure that a minimum fraction impervious of 85% is adopted for land-use in the Model for Urban Stormwater Improvement Conceptualisation.
- Detailed design is to be provided for the onsite stormwater detention, Stormfilter Chamber, OceanSafe OS-1112 and Rainwater tank which includes sections, dimensions, levels, depths, catchments, Stormfilter cartridges details, floatables

baffles etc. This is to ensure that the stormwater system is designed in accordance with Council's guidelines and is effective in operation.

- The 1% Annual Exceedance Probability flows from the site are to be directed to the onsite stormwater detention. Demonstrate how the surface flows in excess of the pipe capacity are directed to the onsite stormwater detention system.
- All pits deeper than 1.2 m must provide step irons at 300 cts.
- On drawing 0340 (P6):
    - The stormwater from the development must be directed into the onsite stormwater detention tank and not into the Stormfilter Chamber. The current design demonstrates that the entire site area is bypassing the onsite stormwater detention system.
    - The area above the on-site detention storage itself and the catchment areas draining to it are considered as bypass where they do not enter the Stormfilter chamber.
    - OceanGuards should treat a maximum of 1000 m^2 of non-roof areas and 1500 m^2 of roof areas. All OceanGuards are to be clearly notated as "200 micron OceanGuards".
    - OceanGuards treating only surface flows require a minimum clear depth of 500 mm below the grate to any inlet or outlet pipe obvert. OceanGuards treating surface flows and upstream pipe flows require a minimum clear depth of 500 mm from the invert of the upstream pipes to be treated, to the obvert of the outlet pipe. Where these pits are treating upstream pipe flows the inverts of all pipes in and out of the pit are to be shown.
    - Where OceanGuards are designed to treat upstream pipe flows, the invert levels on all pipes discharging to and from the pit are to be clearly shown. Provide a minimum clear depth of 500 mm from the invert of the upstream pipes to be treated to the outlet pipe obvert.
    - Show how the roof water gets to the rainwater tank. Provide a separate system for roof water and surface drainage. Pits between the roof lines (i.e. charged pipes) are to be sealed.
    - Provide a pit detail with an Oceanguard fitted.
    - Review the pit size as 600 * 600 mm pits are limited to 600 mm maximum depth and 600 * 900 mm pits are limited to 900 mm depth. Pits greater than 900 mm depth are all to be minimum 900 * 900 mm. All pits within the proposed development must comply with these requirements.
    - Charge line cleanout pits are to be provided at the low point of all charge line systems for the rainwater tanks to facilitate cleaning of the system.
    - Clearly show details for the existing pit in the north western corner (i.e. surface levels, invert pit level, invert existing 825 pipe level etc.).
    - Provide a hydraulic grade line analysis for the 1 Exceedances per Year and 5% Annual Exceedance Probability events for the Stormfilter tank outlet discharging into the existing pit in the north western corner. The false floor of the Stormfilter chambers are to be set at or above the 1 Exceedances per Year level in this existing pit to ensure effective operation of the device.
    - Provide details of the rainwater tank including pre-treatment, volumes, sections, dimensions etc.

- Rename “OceanSafe” to “OceanSave” for the OS-1112 note.
- Demonstrate how the low flow and high flow bypass are diverted within OceanSave OS-1112. Alternatively provide a splitter pit to divert the flows. Provide details and calculations.
- Provide details and sections of OceanSave OS-1112 with levels.
- Provide access grates for the onsite stormwater detention, rainwater and Stormfilter tanks.

d. Stormwater & Flooding Report (by TTW revision 3 dated 16 September 2022) is to be amended to include the following:

- In Section 3.1 amend the imperviousness to minimum 85% for post development. Amend DRAINS and onsite stormwater detention calculations accordingly.
    - The DRAINS model is to include the total proposed development area (including all bypassing areas). Provide onsite stormwater detention catchment plan.
    - The Model for Urban Stormwater Improvement Conceptualisation is to be amended to include appropriate nodes representing the proposed land-use draining to the specific water quality devices. The Model for Urban Stormwater Improvement Conceptualisation catchment breakdown is to be in accordance with Chapter 9 of Council’s Water Sensitive Urban Design Developer Handbook 2020 and is to include split catchment nodes such as roofs, impervious areas, pervious areas, road areas etc.
    - The Model for Urban Stormwater Improvement Conceptualisation is to include the total proposed development area (including bypass areas). Provide Model for Urban Stormwater Improvement Conceptualisation catchment plan.

e. Flood Emergency Response Plan by TTW (dated 16 September 2022) is to be amended to include the following:

- Provide and indicate permanent fail-safe, low maintenance measures incorporated in the development to ensure timely, orderly and safe evacuation of students and staff from the area. Provide details when the evacuation will occur once the flood reaches a particular location, depth, extent etc. Additionally, demonstrate that the displacement of staff and students during times of flood will not significantly add to the overall community cost and community disruption caused by the flood.
- Evacuation route north of the site as shown in Figure 5.1 of the report is not accepted. The route should include evacuating on higher ground along Kaluta Avenue and follow the local ridge along Abell Road. The route should extend east along Abell Road towards Richmond Road. An alternate route should include east along Abell Road and cut off across Glengarrie Road and head south towards South Street if there are any issues with Richmond Road during the flood event.
- Detailed consultation with State Emergency Services is required to address their flooding concerns and an Emergency Response Plan from State Emergency Services will also be required for the site and implemented into the development.