



Your ref: SSD 34991713
File no: MC-22-00006

21 November 2022

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

Recipient Delivery: Thomas.Bertwistle@planning.nsw.gov.au .

Attention: Thomas Bertwistle

Dear Sir

SSD 34991713 – Lot 7 Warehouse and Distribution Centre

Thank you for your correspondence dated 17 October 2022 requesting our advice on the proposed Warehouse and Distribution Centre on Lot 7 which is a State Significant Development proposal under section 4.36 of the *Environmental Planning and Assessment Act 1979*.

The proposal has been reviewed by our officers and we object to the proposal until all issues listed in the Attachment to this letter are addressed and the information required is referred back to Council for reconsideration.

It is to be noted that the comments provided are pre-emptive of future modifications to the original SSD approval 9667. As these modifications are yet to be finalised or determined, the comments provided are subject to change.

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

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Blacktown Council's submission to SSD-34991713 – Warehouse and Distribution Centre on Lot 7

1. Planning Issues

- The proponent must address urban heat in the context of Western Sydney's climate. In this regard, the roof of the distribution centre and awning and associated offices must utilise high albedo and high emittance roofing materials and be light coloured in accordance with Blacktown City Council's Responding to Climate Change Strategy (<https://www.blacktown.nsw.gov.au/About-Council/What-we-do/Environmental-Plans-and-Policies#section-2>)
- All fire tanks are to be suitably screened and protected by bollards to prevent incidents with passing vehicles or trucks. The northern elevation of the fire tank is visible from the estate road and this elevation is to be screened by a feature screen
- Any signage proposed on the main building must be accompanied by an assessment against Schedule 5 of the Industry and Employment State Environmental Planning Policy 2022 and detailed on elevation plans.
- The northern elevation of the proposed warehouse is in a prominent location being the first visible warehouse within the estate, in this regard blank facades that address the key estate road is not supported. It is recommended to provide some form of articulation, modulation or use of different materials on this key elevation.
- The proposal entails a significant proportion of the site as hardscaped surface, opportunities to incorporate additional landscaping where possible is highly encouraged.
- An outdoor communal open space is to be established for both office workers and drivers. Additionally, indoor sheltered area should be available for drivers utilising the site.
- Clarification is requested regarding the tenants of the proposed warehouse. It is unclear whether there will be multiple tenants given Drawing No. 12493_DA082 Issue P2 indicates 2 tenancies on Sign DIR1 and Sign DIR2.
- Additionally, Drawing No.12493_DA011 Issue P4 indicates an intertenancy wall location. Council has concerns regarding the parking allocation of the site in the event two different tenancies are present on site as the parking allocation is not distributed evenly over both eastern and western portion of the site.
- It is to be noted that the development as a whole does not comply with parking requirements as per Condition B1 of SSD 9667 should the development be converted to light industrial/general industrial uses in the future hence clarification of tenants is required.
- The Green Travel Plan has not been submitted for review.

2. City Architect Issues

- The quantum of canopy tree planting to the perimeter of the site is required to be increased as this will assist in the screening of building in addition to contributing towards heat mitigation.
- The retaining walls located at the boundary of the site are imposing and recommended to be softened via stepping and landscaping to reduce their impact on the streetscape.

3. Drainage Engineering Issues

- The stormwater management strategy is to be updated in accordance with SSDA-9776 MOD-1. The engineering plans, report and modelling are to be updated accordingly whilst considering the relationship to the stormwater system approved under SSDA-9667 MOD-1. The report is to clearly outline proposed changes, updates and additional impacts from that approved under SSDA-9667 MOD-1.
- Provide a MUSIC model for the proposed development consistent with the water quality requirements approved under SSDA-9667 MOD-1. The model under SSDA-9667 is to be amended to include the detailed land-use and catchment breakdown for this development.
- Provide MUSIC, DRAINS and flood models electronically to Council for review.
- Engineering plans by at&I (dated 20 May 2022) are to be amended to include the following:
 - Drawings C4030 (A) to C4033 (A):
 - i. Water conservation is required for the development. A rainwater tank is required to meet the water conservation targets. A minimum of 80% of non-potable water demand for the development is to be met through the reuse of rainwater. Non-potable demand includes all landscape watering together with all internal uses (i.e. toilet flushing) plus any site-specific uses such as truck washing. Clearly show the rainwater tank on the plans and provide details. Refer to Councils WSUD Developer Handbook 2020 for MUSIC modelling guidelines including water usage rates.
 - ii. 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.
 - iii. Charge line cleanout pits are to be provided for all rainwater tank charge lines at the lowest point in the system. Provide a 5 mm dribble hole and a screw cap on the charge line
 - iv. Provide a pit schedule detailing the size of pits, levels etc.
 - v. Review the pit size as 600 * 600 mm pits are limited to 600 mm

- vi. 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.
 - vii. The internal pipe network is to be designed in accordance with the Council's Engineering Guide for Development 2005 to carry the 5% AEP (20 year ARI) storm flows. The 1% AEP flows from the site are to be directed to the OSD. Demonstrate how the surface flows in excess of the pipe capacity are directed to the OSD system.
 - viii. On drawing C4032 (A), provide details and levels of the connection into the stub and culvert. Provide HGLs to ensure sufficient hydraulic capacity in the drainage system.
 - ix. On drawing C4033 (A), the stubs connecting into Pit B/14 are to be minimum 875 mm diameter. Amend the design accordingly.
 - x. Provide details of the GPT OS-1515 including sections and levels to ensure that the GPT is operating efficiently. Provide HGLs accordingly.
 - xi. The splitter pit arrangement for GPT OS-1515 is to ensure that only low flows are directed to the bio-retention basin and the high flow bypass is directed to the detention basin. Provide details.
 - xii. Provide the DRAINS model for the internal drainage and estate level drainage electronically for review.
 - xiii. All pits deeper than 1.2 m must provide step irons at 300 cts.
 - xiv. Ensure that minimum cover of 300 mm is provided for pipes.
- Drawing C4050 (A), the post developed catchments are to be consistent with the SSDA-9667 MOD-1 to ensure that the northern inlet to the bioretention basin will discharge approximately one-third of the total area of Lot 7. The southern inlet to the basin will discharge the remainder of southern portion of Lot 7. Provide details and clearly show these catchments.
- Flood report by BMT (version 01 dated 19 May 2022) is to be amended to include the following:
 - Section 3 of the report states that Lot 7 is flood-free up to and including the 0.2% AEP event and inundated in the PMF. The original design approved under SSDA-9667 provided flood immunity for all lots up to the PMF event. Please clarify.
 - Provide flood maps for the 1% AEP, 0.2% AEP and PMF events for the existing and proposed development conditions.

- In addition to above, provide flood difference maps for the 1% AEP, 0.2% AEP and PMF events between the proposed development plus existing conditions and proposed development plus approved SSDA-9667.