



Your ref: SSD 10477
File no MC-20-00007

14 September 2020

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

Recipient Delivery ania.dorocinska@planning.nsw.gov.au

Attention: Ms Ania Dorocinska

Dear Ms Dorocinska,

SSD 10477 – Stage 3 Facilities Sydney Business Park, Marsden Park

Thank you for the opportunity to comment on the State Significant Development proposal lodged under Part 4 of the Environmental Planning and Assessment Act 1979 ("the Act").

The proposal has been reviewed by our officers and a number of issues have been raised and listed in **Attachment A** to this letter. We request the items listed in Attachment A to be addressed by way of amended or additional details and referred back to us for reconsideration before we can provide conditions for the final determination made by the Department.

If you would like to discuss this matter further, please contact our Town Planner, Rachel Walker on 9839 6104.

Yours faithfully

Judith Portelli
Acting Director Planning and Development

Connect - Create - Celebrate

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ATTACHMENT A

Matters to be considered and addressed:

1. Planning and Design

a. Floor Space Ratio- Warehouse 4

- The floor areas on the Stage 3 Master Plan, Sheet No. 1200045_A0003, Issue P dated 03/08/2020 indicate that Warehouse 4 exceeds the maximum FSR of 0.7:1.

b. Landscaping

- The applicant should demonstrate that at least 30% of paved areas on each site are shaded to reduce the 'heat island effect'.
- It should be demonstrated that at least 15% of the site area is pervious. The EIS indicates that 10% is provided which includes roads.

c. Car parking areas

- Tree planting is required to be provided with a minimum 2m bay of deep soil condition at maximum intervals of 25 metres (9 parking bays). This has not been provided for the Warehouse 4 carpark, or Warehouse 1 in 2 locations, in the car park adjacent to the north-south road frontage being the north-eastern portion of the car park adjacent to the bicycle parking, and adjacent to the pedestrian pathway in the middle of boundary along the same frontage.
- Parking within the loading bay areas should be provided with planting at the same intervals as mentioned above.
- Pedestrian links within all car parks are to be provided, including pedestrian line markings and footpaths.

d. Communal areas

- Details are to be provided on the provision of communal areas, demonstrating compliance with Table 6-2 of the Growth Centres DCP which requires 1% of the total site area to be provided as a communal area.
- Details of landscaped communal areas for staff of Warehouse 2 and Warehouse 3 have not been provided as part of the submitted landscape plan.
- Communal areas are to be accessible from the office and are to be usable and provide attractive seating and amenity areas for staff incorporating paved areas, soft landscape and shade planting. Solar access is also to be demonstrated.

e. Setbacks

- All warehouse carparks encroach the 7.5m setback. Hardstand areas are not permitted within this area. Plans should be amended.

f. Fencing

- Details of the height and type of fencing to be provided to each of the warehouse to be provided.
 - The area marked 'Cycles' for Warehouse 4 is fenced off and is not accessible.
- g. **Acoustic wall**
- Details of the appearance of the 2.4m high acoustic wall and visual treatment at the caravan park and also the 2.7m high acoustic wall at the south-western corner of Warehouse 4.
- h. **Asset Protection Zones**
- Warehouse 4 is required to be provided with a 15m Asset Protection Zone in accordance with Figure 2.4 of Schedule 3 Marsden Park Industrial Precinct of the Growth Centres DCP. The rear south-eastern corner of Warehouse 4 is setback 6m which does not comply with either the DCP or the submitted Bushfire Assessment which indicates that ≥ 8 -20 metres is an adequate APZ.
- i. **Subdivision**
- The application includes subdivision of Lots 4 & 5 DP 1210172 and Lot 36 DP 262886 into 7 lots. There is additional land which forms part of these lots which has not been accounted in the draft subdivision plan, to the west (Basin A and E2 zoned land) and land to the east.
- j. **Impact on Caravan Park**
- The truck exit for Warehouse 2 is located directly adjacent to the Caravan Park and is within the 20m buffer zone required by Schedule 3 of the DCP. This driveway should ideally be relocated with a landscaped setback to be provided along this boundary. The impact of this truck exit is also dependant on the intended usage times so clarification is also sought as to the hours of truck operation on the site.
 - A possible solution also is if the roller doors at the rear of Warehouse 2 were closed between 10pm and 7am so that no truck movements were permitted within those hours along the exit driveway adjacent to the Caravan Park. No noise generating activities should be permitted in this time. We would need a commitment from the applicant that this was both achievable in their planned operation and actually doable before conditioning this could be considered.
- k. **Main Shared Pedestrian & Cycle Roadside Routes**
- The southern side of Hollinsworth Road is identified on Figure 3.3 of the Precinct Schedule as a Main Shared Pedestrian & Cycle Roadside Route. Figure 5.3 requires the footpath to be increased to 3m to provide shared pedestrian/cycle path. The subdivision plan will need to be amended to provide this pathway.

2. Engineering

Subdivision Component:

1. Water Sensitive Urban Design (WSUD) requirements – Currently, the regional basin infrastructure has not been constructed to address the on-site detention and water quality requirements for the two greater catchments within the development, those being the eastern-draining and the western-draining. Controls are required as follows:
 - a. Eastern-draining Catchment (Warehouse 3 site plus road portion):
 - i. Water Quality – Water quality requirements exist for the small portion of road draining to the recently approved channel, currently being constructed under Council approval (reference SWC-20-00018). The water quality requirements will ultimately be addressed by regional basin 'Basin E', though will require temporary water quality measures to be in place in the interim.
 - ii. OSD – As a result of 'Basin E' not yet having been constructed and not yet operational, the catchment will require temporary OSD measures to be accommodated. For the small portion of road in this catchment, it is likely that an overcompensation in volume within the on-lot tank will be necessary to manage this requirement.
 - b. Western-draining Catchment:
 - i. Water Quality – With the current proposal, temporary treatment measures proposed for the subdivision's roads are temporary pit basket inserts. This is not a sound strategy and is not supported by Council without exhausting other approaches. Therefore, the site's development depends wholly on the construction and operation of regional basin 'Basin A'. This will mean that the consent will need to include strict requirements to uphold the timing of the site's construction and dedication phases in relation to the construction of 'Basin A' and its associated GPTs. The alternative is through proposing compliant temporary facilities, shown on plan as part of this concept design phase.
 - ii. OSD – Similarly to the above, no temporary detention measures (i.e. temporary detention basin) have been provided to address the OSD requirements for the subdivision, thereby creating a dependency on the regional basin to be completed to ensure WSUD requirements are upheld. Conditions will need to be included in the consent to reflect this control and will limit activation of the construction approval stage.
2. Drainage line 303 is proposed to drain a small catchment of public road through an easement for drainage, and as such must demonstrate accommodation of 100-year flows, either through an overland flowpath above the pipeline or within the drainage

line itself. This also applies to the temporary swale proposed along the future Hollinsworth Rd road reserve alignment. Calculations are required to support the design for both conveyance strategies.

3. Further to the above, it appears the catchment drainage through the proposed easement may be reduced by directing the outlet from the Warehouse 2 treatment tank to pit 306/01, and ultimately connecting this line into pit B05/17.
4. The catchment plan on sheet 401 must divide the western-draining catchment into segments showing the total areas draining through;
 - a. The proposed GPT and subsequent easement (pit 303/03)
 - b. The temporary swale and future Hollinsworth Rd alignment
 - c. Each private filter tank

This catchment separation is required to outline the key drainage strategy for clarity and assessment, as per the above comments.

5. Road drainage pits within the roundabout's kerb returns should be avoided. The design should explore further options to achieve this, and outline the approach.
6. Pit C02/08 is too close to the proposed driveway for Warehouse 3 and must be moved to achieve a minimum 1m clearance between the two. This is also to be addressed in relation to the driveways servicing the carpark for Warehouse 1 (along Road 1 at approximate chainages 165 and 295).
7. The retaining wall adjoining the recently constructed trunk drainage line and channel (along the eastern boundary of the Warehouse 2 lot immediately north of Hollinsworth Rd) must have its foundations and footing below the 1V:1H zone of influence of the 2 x 1500mm diameter pipelines adjoining. This will be conditioned in the consent and should be noted on plan.
8. Show additional detailed sections at boundaries where a level difference exists and is managed by a retaining wall or batter. The sections must include the location of the wall in relation to the boundary, the TOW and BOW levels, as well as context for the levels on both sides of the boundary (i.e. rising, falling, etc.). Adjoining sites include:
 - i. Tigerpak Building (Syd. Business Park) – DA-19-00984
 - ii. South St – DA-19-00821
 - iii. Trunk Drainage Channel (Logos) – SWC-20-00018
 - iv. Industrial Warehouse (Logos) – MC-17-00001
9. A downsizing of the drainage pipeline is proposed from Pit 301/11 (future GPT). Justification and context is required for this design choice.
10. The design levels for the Hollinsworth Rd extension and connection to the future regional basin (Basin A) will be assessed and commented on by Council's Asset Design team.

11. The design vehicle for the roundabout is a B-triple, for which turning / swept paths will need to be provided on a copy of the engineering plans. Council's Traffic team is to identify if the turning paths presented are compliant.

Buildings:

12. Multiple driveways are proposed adjoining high walls along boundaries. Additional detail is required to demonstrate the design elements that ensure the safety of vehicles adjoining these levels changes.
13. Drainage line from pit C01/10 is shown traversing a future adjoining lot and will result in an easement across the carparking area. An easement with this configuration is to be avoided by either draining Warehouse 3 directly to Hollinsworth Rd, or by reconfiguring the drainage line to be less invasive of the Warehouse 4 lot (i.e. align with boundaries).
14. The HGL appears to show surcharge along most of drainage line A04 (Warehouse 1). To be addressed.
15. Driveway profiles required to be shown to ensure no vehicle scraping occurring as a result of the levels changes from the road into the carparking areas. Required for all warehouse driveways.
16. Drainage lines within each lot intended to accommodate a pit basket for roof water appear not capable of the required level changes. Further detail is required to demonstrate how all roof water directed into a surface pit will pass through a basket insert. This will need to be done by highlighting each pit where this occurs and providing confirmation of the levels required being met in the design to facilitate the outcome as intended.

3. Drainage

Review of the engineering plans by Orion Consulting for stage 3 Sydney Business park, Project No. 20-0127, Set 02, Rev. A, Dwg. No. 000 to 602, dated 31.07.20 raised the following issues:

1. The site has proposed stormfilters as per the design plans. However, the preference for the site as per the Marsden Park precinct planning area is bioretention systems (raingardens) for the site area. There are several references in the stormwater management report that intend on providing a different treatment system at CC stage. Please note that this will not be possible. The design of the water treatment system will be conditioned and cannot be altered unless a MOD application is approved through council. Note that all the below notes apply to the submitted engineering plans and do not provide feedback on bioretention design. These can be found through Councils WSUD Standard drawings.
2. Provide a temporary 42mm dead storage in addition to any detention volumes for the entire site excluding the SP2 area. This is to be pumped to a legal point of discharge. This interim plan is to be provided in case the regional basin and the associated downstream drainage infrastructure is not yet developed. Dual

alternating pumps are required that will fully drain the stored volume within a maximum of 12 hours. The OSD is to discharge to the conservation zone at surface level in the normal manner provided that the dead storage is accounted for as above and that suitable scour protection measures are used. The dead storage can be separate to the OSD or can be below the OSD. In effect the Top Water Level (TWL) of the dead storage can be the base of the OSD.

3. As per the engineering guide, NWGC DCP and PAM, major drainage is to be considered through roads and not through private lots. The suggested overland flows and SAG at Road 01 is to be regraded to Hollinsworth Road to rectify this. This also deletes the public GPT located on private lot 3001. Liaise with Council's S7.11 team to regrade road 1 to Hollinsworth Road. Amend all drainage long sections as a result. S7.11 team has undertaken a preliminary investigation to see the possibility of amending Hollinsworth road levels to consider this. The preliminary results were achievable.
4. Provide an electronic copy of MUSIC for assessment, this is for the treatment, water conservation and SEI. This was not provided. Note that the SEI requires the pre-development site to be 100% pervious.
5. OSD plan drawings including section details and orifice details with all levels as per the provided Deemed to Comply spreadsheet is required. Clearly indicate the designed volume and the required volume. Include an access track for maintenance to the basin with minimum 3m at maximum 10% grade unless specified otherwise by the S7.11 team.

WSUD

6. Dwg. 203 (A), the private road/driveway for warehouse 3 has bypass that is unaccounted for. This is to be considered bypass in the MUSIC model and amend the Water Quality catchment to show this as bypass. The bypass in question is the area downstream of pit C04/08.
7. Dwg. 202 (A) to 203 (A), the landscaped area to the west of warehouse 2 is shown to be treated. However, this battered landscaped area is bypassing treatment. Either consider this as bypass or provide a swale at batter toe to collect this flow. Design for the 20-year storm at minimum. Drainage line from B05/10 to B05/13 is to be moved adjacent to the toe of batter to assist in collecting the swale flows. Provide calculations and cross sections of the swale.
8. Dwg. 200(A) to 204 (A), for each stormfilter tank provide a clearer note stating 'stormfilter tank' and then refer to details.
9. Dwg. 200(A) to 204 (A), clearly highlight the stormfilter tank by either a hatching or colour.
10. Dwg. 200(A) to 204 (A), provide sufficient stormfilter tank pits on the plans. Access grates to the tank must be a minimum 900 mm by 900 mm and are positioned such that the maximum distance from any point in the tank to the nearest grate is not greater than 1.5 m for clear heights less than 0.7 m, 2 m for clear heights less

- than 1.0 m, 3 m for clear heights less than 1.5 m, 4 m for clear heights less than 2.0 m and 6 m for clear heights greater than 2.0 m.
11. Dwg. 200(A) to 204 (A), provide a note to state that proposed roads are to be treated temporarily by OceanGuard pit inserts on all plans excluding road 02. These are to be excluded from MUSIC modelling.
 12. Provide the number of toilets and irrigated areas in the stormwater management report as part of the water conservation for each warehouse. Provide a MUSIC model to justify this.
 13. The water quality catchment map (Appendix A) within the stormwater management report is to be introduced into the engineering plans and not within the stormwater management report.
 14. Dwg. 200(A) to 204 (A), all stormfilter false floor levels are to be above the 1EY downstream HGL. Provide a note stating the 1EY HGL level immediately downstream of the stormfilters to indicate this.
 15. The maximum stormfilter tank sizes are as follows: size the internal dimensions of the Stormfilter tank upstream of the Stormfilter weir to 37 m²/ha draining to the tank for a 460mm cartridge and 26 m²/ha draining to the tank for 690mm cartridge. Currently the proposed DN3250 manhole does not cater for the proposed cartridges.
 16. Dwg. 405: state the number of cartridges and types used for each stormfilter tank and provide levels for all sections.
 17. Dwg. 405: provide a section for the warehouse 41 cartridge system with levels.
 18. Dwg. 405: The minimum length of the Stormfilter weir (L) is to be increased to provide a maximum velocity of 0.4 m/s under the baffle during peak flow (i.e. $L > Q_{100} / (0.4 \times 0.19)$, or $L > 13.2 \times Q_{100}$) in m, where Q_{100} is in m³/s) for the 460mm cartridge. The minimum length of the Stormfilter weir (L) is to be increased to provide a maximum velocity of 0.4 m/s under the baffle during peak flow (i.e. $L > Q_{100} / (0.4 \times 0.25)$, or $L > 10 \times Q_{100}$) in m, where Q_{100} is in m³/s) for the 690mm cartridge. Provide calculations.
 19. Dwg. 405: Provide a reference and detail number for the OceanGuard pipe flow configuration. Furthermore, provide a surface type OceanGuard and clearly indicate which pit insert is used in which pit. This can be indicated on the pit schedule or specifically on the plans. OceanGuards (Enviropods) treating only surface flows require a minimum clear depth of 500mm from the grate to any inlet or outlet pipe obvert. OceanGuards (Enviropods) treating surface flows and upstream pipe flows require a minimum clear depth of 500mm 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.

Drainage

20. Clearly label all existing infrastructure on Dwg. 200 (A)-204 (A)
21. Provide a pit schedule while clearly identifying which pits contain an OceanGuard. Differentiate between the OceanGuard surface and pipe flows.

22. Provide DRAINS model of the sites drainage system while considering all stormfilter, basin and GPT tailwater levels. Consider ultimate scenarios and liaise with S7.11 team for levels.
23. Pits at kerb returns are to be avoided as per the engineering guide.
24. Dwg. 204 (A), Pipeline from pit C01/01 to C01/10 is to be designed for the 1% AEP flows without surcharging onto neighbouring lots.
25. Dwg. 200 (A) to 204 (A), clearly delineate each lot boundary
26. Dwg. 204 (A) clarify the burdened and benefited lot for the drainage line shared on the boundary of warehouse 3 and 4. i.e. C01/07 to C01/10.
27. Dwg. 201 (A) and 203 (A), Provide a name to indicate the existing portion of Hollinsworth road and future Hollinsworth road.
28. Dwg. 200 (A) to 204 (A), there are several downpipes running through rainwater tanks. Fix this drafting error.
29. Dwg. 204: there are conflicting contour and spot levels to the south of warehouse 4. These will need to be revised and made consistent with the Architectural spot levels at the location especially near pit C04/02 where the architectural plans (Dwg. WH4 Site Plan, 31.07.20) show this as 49.50 but the engineering plans show this as 50.34.
30. Dwg. 204 (A) and 400 (A), most of the south area landscaping and driveway of warehouse 4 is in bypass for both water quality and detention basin. Furthermore, the current contour and spot levels will create ponding in that area. Provide the area as per the stormwater catchment plan.
31. Dwg. 401 (A), batter works to the north of CAT 1 are bypassing detention basin yet they are shown as draining to the detention basin.
32. Provide sufficient and suitable drainage to all recessed docks and design for the 1% AEP storm where it is recessed to eliminate permanent ponding in the area.
33. Dwg. 201 (A) to 203 (A): Provide top and bottom spot levels for the proposed temporary open grass lined channel. State that this is temporary.
34. Clearly provide notes for the future and temporary infrastructure on all plans.
35. The staging plan as per Dwg. A0006 (C) dated 31.07.20 of the architectural plans shows the temporary basin being provided as stage 2 and not stage1. This is to be amended to be for stage 1.
36. Dwg. 201 (A): Provide temporary suitable scour protection at the turn of the open grass lined channel just before the future regional GPT.
37. Revise all models, reports and plans to reflect the above comments.
38. Provide a clear roof/awning outline.
39. Headwall 301/11 on Dwg. 201 should only cater for the 3 months flows to the ultimate bioretention. Resize this pipe to suit the 3months flows. Any flows in excess of the 3month flows must be conveyed to the ultimate basin once constructed.

Provide clearer contours around the headwall to show how the 1% AEP flows drain to the ultimate basin.

40. Dwg. 401 (A): Provide a temporary swale to capture the runoff from the undeveloped catchments. Provide swale sizing and cross sections. The swales are to clearly show how the undeveloped catchment drains to the temporary basin as proposed but not shown.
41. Dwg. 006 (A): provide details of the temporary 1:1 batter, provide a note stating that retaining walls beyond batters of 1:3 (private) are to be to the satisfaction of a geotechnical engineer.
42. On all drainage long sections, state whether the HGL provided is for the 20yr ARI or the 100yr ARI.
43. All pits are to be sealed from pit 301/11 to the ultimate discharge point to avoid any premature surcharging of the 3month flows.
44. Dwg. 413 (A): Provide the downstream IL and details of the existing connection point for the proposed pit 304/05.

Note:

Include Council's engineering requirements as a summary note on the engineering plans e.g. OSD required/not required and whether temporary or permanent etc. Include design summaries where needed.

4. Asset Design

The following information is required to complete the assessment and to be consistent with the precinct S7.11 works:

1. The timing associated with the delivery of works need to be addressed. In particular, an Interim Stormwater Strategy is required to demonstrate how the basin will operate / drain in the event that the downstream diversion pipe has not yet been constructed.
2. The Interim Stormwater Strategy needs to ensure that the first 42 mm of runoff across all Stage 3 developed areas is captured within a retention basin. The Interim Stormwater Strategy needs to be consistent with the "Protecting Little Creek" Stormwater Management Strategy Report (Bligh Tanner, 2015). The Interim Stormwater Strategy also needs to ensure that the detention volume (determined using Council's "deemed to comply" tool) is then also achieved. The combined basin therefore needs to cater for both the detention and retention volumes.
3. Details of the proposed detention / retention basin must be provided (plan, outlet configuration and sections) to demonstrate both (a) how it fits within the SP2 land; and (b) how it will operate as part of the Interim Stormwater Strategy.
4. The supplied report states that "If this connection is not available, excess volume runoff would be transferred from the little creek catchment to the Marsden Creek

catchment via Basin E as per the currently approved and operating system for Basin B”.

Further details are required to demonstrate how the interim basin will connect into and function as part of the operating system for Basin B. In particular, an assessment is required to confirm that the rising main and pumps are suitably sized to cater for any additional flows. A concept plan is also required to show how and where the outlet from the interim basin will connect into the Basin B system.

5. Details of the Sediment Basin (including plan and sections) shall also be provided to support the Stage 3 development.
6. Three (3) outlets are proposed to connect to the basin, which is generally consistent with the overall S7.11 works. However the following amendments are required:
 - (a) The outlet at Pit 301/17 connects to a future raingarden in the S7.11 land. The 825 mm outlet pipe is to be lowered to IL36.86 m AHD. The pipeline should still be at minimum 0.5% longitudinal grade.
 - (b) The outlet at Pit A01/15 is currently shown to discharge at a future turning head within the S7.11 basin. The concept design therefore needs to be relocated approximately 22 m to the south. Refer to the attached Sketch 1.
 - (c) The outlet at Pit A01/15 also appears to have a clash between the 825 mm Pipe and the 1200 mm pipe. This needs to be addressed in the revised DA drawings. It is suggested that the outlet invert level is lowered to IL35.90 to decrease the drop structure into the S7.11 basin and to try and remove the clash. Refer also to the attached sketch.
 - (d) The outlet at Pit 301/11 is a future GPT / Splitter Pit for the S7.11 basin. The invert level of this GPT needs to be slightly lifted to RL 38.7 m AHD.
7. Tailwater levels at the future S7.11 basin are as follows:
 - 1 year ARI – RL 38.20
 - 2 year ARI – RL 38.58
 - 5 year ARI – RL 38.80
 - 100 year ARI – RL 39.35

All water quality systems on the proposed lots are to be set at least above the 1 year ARI tailwater levels, whilst the invert level of the future GPT is to be set above the 2 year ARI.

8. The design plans include a second GPT off Hollinsworth Road, which receives flows from Road 1, through the Warehouse 1 site before ultimately discharging into the Basin. It is noted that this second GPT is not part of the contribution plan and therefore any costs would need to be borne by the developer.

As an alternate strategy, Council suggests regrading the internal Road 1 back towards Hollinsworth Road which would enable flows to be directed into the GPT at Pit 301/11. This would also remove the need for a flowpath / easement through the Warehouse 1 site. Refer to the attached Sketches 2 to 6.

9. The design plans show Line 301 as an 825 mm pipe at 0.5% extending between Pit 301/11 and the future raingarden at Pit 301/17.

This pipeline is required to convey 3 month ARI flows to the regional raingarden. Please provide Council with a copy of the hydrology model which was used to inform the size of the 825 mm pipe. Council believes this may only need to be a 750 mm pipe at 0.5%. This size needs to be resolved prior to Construction Certificate.

10. Overland flowpaths into the S7.11 land and beneath the Transgrid easement need to be clearly defined on the design plans in order to demonstrate how flows will be conveyed to the interim basin. These flowpaths need to be clear of all stanchions and convey the 1% AEP flows to the interim basin. On Plan DA/201, the flowpath extending from Pit 301/11 into the basin is unclear.
11. The overall Stormwater Catchment Plan (DA-401) shows Catchment 1 (15.971 Ha) draining to Basin A. Near Warehouse 1, there is however an additional bypass area fronting Astoria Street (road frontage up to the carpark). This needs to be treated as a bypass catchment and considered in the deemed to comply.
12. The design plans include on-lot treatment using a combination of pit inserts, rainwater tanks and filter cartridges. The report has noted that "*on-lot raingardens are to be investigated as part of the detailed design*"

It is noted that the regional Water Cycle Management Strategy which supported the overall Precinct, provides 'on-lot treatment' using raingardens rather than proprietary products. For consistency, Council's preference is therefore to adopt raingardens wherever possible.

13. The Stormwater Report mentioned that those remaining roof areas (which are not directed to a rainwater tank) are to be "*directed through a series of pipes into OceanGuard baskets*". It is noted that this configuration requires additional pit depths. All of these proposed locations need to be clearly shown on plan with levels being considered.
14. The design plans need to show clearer lot boundary definition. Consideration should be given to the proposed stormwater pipeline which extends along the apparent lot boundary of Warehouse 3 and 4. Council suggests shifting the pipeline into Lot 4 to avoid unnecessary easements.

5. Biodiversity

- a. Prior to further assessment, the application is to provide either a Biodiversity Development Assessment Report (BDAR) or an approved BDAR waiver from the NSW Department of Planning, Infrastructure and Environment.
- b. A Biodiversity Management Plan ("BMP"), comprising 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 is to be submitted by the proponent for Council's consideration. The BMP is to relate to the land within Lot/s [Parts Lots 4 & 5 DP 1210172 and Part lot 36 DP 262886] 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).

The BMP 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. Where tree removal is required then a licensed wildlife carer or ecologist will be required on site as a fauna handler ('Rescuer' under the Code) during tree removal works.
- A procedure for controlling the introduction and spreading of weeds and pathogens, including hygiene protocols and the arrangements for monitoring;
- Proposed strategies for re-use of top soil, tree hollows, logs, coarse woody debris and bush rock.
- All identified tree hollows proposed to be removed, are to be salvaged from trees removed 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 3 nest boxes or artificial hollows with three nest boxes / artificial hollows for every 1 hollow removed.
- A procedure for dealing with unexpected threatened species finds. The procedure must include, as a minimum, the following:
 - stop work arrangements in the immediate area of the threatened species;
 - notification and communication protocol;
 - consultation with the specialists to assess the significance of the find; and
 - a list of qualifications, approvals, licences or permits likely required prior to recommencing works.
- The BMP is to include protocols for the relocation of any threatened flora species observed onsite. The BMP is to be prepared in accordance with the Policy for the Translocation Operational Policy 2019, Guidelines for the Translocation of Threatened Plants in Australia (2018), NSW Species Recovery Plans State and if applicable Commonwealth Threat Abatement Plans or other guidelines.

6. Traffic

- a. The following comments have been provided:
- Traffic report indicated 779 parking spaces are to be provided which complies with the DCP controls for this area. However, it is noted that some parking spaces are provided under the electrical transmission easement. Acceptance of this parking arrangements should be sought with the energy companies (TransGrid).
 - Provision for adequate sight distance needs to be made for both pedestrian and vehicular movement at the proposed driveway in accordance with Section 3.2.4 AS 2890.1 and Figure 3.2 of AS 2890.1 to ensure safety of pedestrians on the footpath system and motor vehicles along the new driveway.

7. Open Space

The following changes are required to be made to the landscape plan:

- a. That root control devices are installed for all street trees, root directors and linear root barrier installed to council specifications would be acceptable.
- b. Street tree planting spacings should be approximately 8 metres taking into account vehicle sightlines and street lighting.
- c. The species for the collector road should be changed to *Angophora floribunda*.