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15 February 2017

Necola Chisholm
Environmental Planning Officer
Dept. of Planning & Environment
Industry Assessments
GPO Box 39
Sydney NSW 2001

Dear Ms Chisholm

PUBLIC EXHIBITION SSD 7664 - HORSLEY DRIVE BUSINESS PARK, STAGE 2, WESTERN SYDNEY PARKLANDS, LOTS 18-24 IN DEPOSITED PLAN 13961

The following outlines Fairfield Council's submission in relation to the above matter as endorsed by Council's Outcomes Committee Meeting on the 14 February 2017.

In summary the key issues and concerns of Council in relation to the proposal are as follows;

- The site is located in a critical location at the top of a major drainage catchment in Wetherill Park. Despite advice from Council to representatives of the Western Sydney Parklands (WSP) Trust highlighting the sensitivity of stormwater and drainage issues applying to the location, the proposal lacks sympathy and integration with the landscape characteristics and topography of the site.

- Overall the Council considers the design of the stormwater system servicing the site is deficient. There is capacity to amend the design and layout of the development to assist in maintaining natural flow characteristics of the site.

- There is scope to modify the layout of the development to enhance landscape characteristics in the development and promote better integration with adjoining Western Sydney Parklands where the development is located.

- Additional clarification is required in relation to technical issues including stormwater modelling to ensure that there will be not detrimental flooding impacts downstream of the site.

- Council has major concerns regarding the impacts of the development on the surrounding road network. Specifically in relation to the potential for unacceptable traffic congestion (particularly on Cowpasture Rd). There are also concerns in relation to the adequacy of on-site car parking provision.

Further detailed information in relation to the above concerns are set out below.

CATCHMENT MANAGEMENT

Council is disappointed with the proposed developments lack of sympathy to the natural environment. The proponent could have made use of the land available to the north of the site to so that it could keep stormwater on the surface for site improvement. This would not only help achieve the Parklands core principle of 'sustainable in its management, development and promotion' within its Plan of Management, but also improve the aesthetics of the development.

In addition to the above, Council believes there is capacity to include additional landscaped corridors and buffer areas within the development footprint of the proposal to enhance landscape characteristics of the development and capture stormwater run-off. Appropriate water sensitive measures within the development footprint would include:

- Provision of additional swales in landscaped areas through the site to allow water draining for the large impervious areas to travel aboveground before entering the drainage network.
- Provision of a larger natural channel within the site as the major drainage system which will then discharge into the roadway.

As previously advised to the Trust's consultants, it is requested that the proponent review the design to better integrate stormwater with the landscape in line with the outcomes it has achieved throughout the community facilities in the Western Sydney Parklands.

Flooding

Flood modelling was undertaken by the proponent using Fairfield City Councils Developer Agreement, as requested. In reviewing the results, it is noted that the proponent did not have the model updated with the details of their own development adjacent to this Stage 2 proposal.

This can be clearly seen in figures 6.2 and 6.3 of the Civil Engineering Report – where flooding in the Stage 1 site (south of this Stage 2 site) can be seen to follow the natural contours, which have since been altered.

The proponent is required to have the Stage 2 site remodelled with the adjacent Stage 1 depicted correctly in the flood model, and reproduce the figures 6.2-6.5 to ensure the flooding conditions are still favourable.

Additionally, the statement of 'The assessment also confirms that buildings pads will be free of flooding from the existing flow paths allowing for a minimum freeboard to the 1 in 100 year ARI flood level of 500mm' needs to be proven showing all relevant levels (page 22, Civil Engineering Report).

Water Quantity Management - On Site Detention

A review of Table 7.1 within the Civil Engineering Report showed that changing the sites 14ha catchment from 100% pervious to approximately 95% impervious only changed the peak flow rate leaving the site from 4.57 m3/s to 5.89 m3/s.

It is expected that a change this significant in catchment conditions would produce more than a 28% increase in peak flow. Council requests a copy of the pre and post development DRAINS models for review to ensure the correct parameters have been used.

Water Quantity Management – External Catchment Basins

Northern Catchment

It is noted that the Northern Basin will be constructed to intercept and attenuate flows from the northern catchment so they do not impact the Stage 2 site. It is assumed that the basin will be designed for the 100 year ARI event, therefore having approximately 3100m3 storage.

However no details have been provided of the basins overflow location or structure or how it will handle floods up to and including the Probable Maximum Flood (PMF). This information will need to be provided for review before any comment can be provided.

Eastern Catchment

It is assumed that the 3m wide drainage easement downstream of this basin is to cater for flows greater than the basins design ARI. But with a maximum basin water level of RL 68.00 and the entry point of the easement being RL68.50, this is not possible. The proponent is to clarify if the easement is to be used to carry basin overflow, and if so provide details of the flowpath and how it will handle events larger than the basins design ARI and up to and including the PMF.

Water Quantity Management – Southern Drainage Channels

Both drawings Co11492.11 – DA41 & DA45 within the Civil Engineering Report show the southern drainage channel discharging freely to the existing swale. A stormwater outlet dissipater as per drawing Co11492.11 – DA46 should be constructed at this outlet.

No details have been provided with respect to channel capacity or sizing of the channel or rocks for the southern drainage channel rock drop sill and weir. These details will need to be provided for review before any comment can be provided.

Stormwater Quality Management

Drawing Co11492.11-DA45 within the Civil Engineer Report shows that the stormwater discharges into the bioretention basin on the northern edge, but the biofilter does not begin until approximately 40m away from this discharge point.

The low flows from small rain events, which are the most critical for bioretention, will not be able to reach this biofilter before seeping into the adjacent earth. Therefore the proponent will need to review this design and possibly ensure the biofilter and stormwater discharge points are adjacent.

Summary - requested modifications and details in relation to catchment management

1. The proponent is to review its site concept plan to ensure stormwater is integrated with the environment and landscape
2. Flood modelling is to be updated with the details of the proponent's adjacent site. Updated flood maps are to be provided to show that there is no increase in flooding due to the proposed development.
3. Details are to be provided showing that all building floor levels will be 500mm above any flowpath flooding levels.
4. DRAINS model to be provided to Council to confirm the correct use of parameters. If the parameters are not standard, Council will inform the proponent of any required changes that will require the model to be rerun and reconfirm the current design is still appropriate.
5. Details of northern basin overflow location and structure and how it handles floods up to and including the PMF need to be provided and approved.
6. Details of eastern basin overflow route and how it will handle floods up to and including the PMF need to be provided and approved.
7. Stormwater outlet dissipater to be added to southern drainage channel.
8. Details regarding channel capacity and rock sizing of southern drainage channel to be provided to ensure they are suitable and allow for approval.
9. Bioretention basin design to be reviewed to ensure that stormwater from small rain events will be treated in the biofilter.

TRAFFIC MANAGEMENT

1. Cowpasture Road, between Victoria Street and Trivet Street, is classified as collector road in Council's road hierarchy, and has one (1) travel lane each direction. The subject development is expected to generate approximately 4096 trips/day and is considered to have significant impact on the road network.

2. To reduce the impact on the capacity of Cowpasture Road adjacent to the proposed development, the proponent should look at reducing the size and scale of the development. Alternatively, the proponent shall undertake road works to increase the capacity of Cowpasture Road at this location.

3. Sidra files need to be provided to Council for the existing traffic conditions, proposed traffic conditions and ten (10) years traffic growth for intersections of The Horsley Drive/Cowpasture Road roundabout, Cowpasture Road/The Horsley Drive signals, Cowpasture Road/Newton Road roundabout, Cowpasture Road/Victoria Street roundabout, Cowpasture Road/Trivet Street intersection and The Horsley Drive/Ferrers Road traffic control signals for assessment.

4. The traffic generation rates used by the applicant for calculating the traffic generation by the proposed development is not consistent with the RMS's guide to traffic generating developments updated traffic surveys, 2013. The following rates shall be used for calculating the traffic generated by the proposed development as specified in the updated traffic surveys;

   - AM Peak – 0.52 vehicle trips per 100m2 of GFA
   - PM Peak – 0.56 vehicle trips per 100m2 of GFA
   - Daily vehicle trips – 4.6 vehicle trips per 100m2 of GFA

5. The applicant to justify that the sight distance requirement for commercial vehicle traffic entering Cowpasture Road from the proposed access driveway complies with Figure 3.3, AS 2890.2-2002.

6. The parking rates for the proposed development have been adopted from RMS's Guide to Traffic Generating Developments. This parking rate should be consistent with the values adopted for HDBP Stage 1 and a parking rate of 1 space per 200m2 of GFA shall be used for the warehouse development.

7. Six (6) accessible car parking spaces are proposed in the development. As per the Fairfield Citywide Development Control Plan (DCP) 2013, two (2) accessible car spaces shall be provided for every 100 spaces.

8. The proposed driveway width for warehouse 4 (22,590m2 GFA) shall be increased to allow B-double vehicles to exit the site safely.

9. Based on the Journey to Work (JTW) data, 48% of the workers live in the suburbs located north of the proposed development. The assumed traffic assignment for Trivet Street and Ferrers Road are 15% and 10%. This traffic assignment needs to be justified.

10. At the meeting held on 10 August 2016, Council officers advised the applicant about the potential extension of Victoria Street westwards towards M7 Motorway. The proponent indicates TfNSW and RMS have advised that there are no plans to extend Victoria Street westwards. The applicant to provide further documentation from TfNSW and RMS, regarding this issue.

11. The largest vehicle to service the site is 26 metre B-Double vehicle. The applicant is advised that Trivet Street and Chandos Road are not approved B-Double routes. This will restrict B-Double vehicles accessing the site from Chandos Road and Trivet Street, and will increase B-Doubles accessing the site from Cowpasture Road. The applicant to look at this issue.

12. The proposed driveway location for the subject development is opposite the entry/exit driveways of 125-131 Cowpasture Road, Wetherill Park. There will be conflicts between vehicles entering and exiting the subject development and the vehicles entering and exiting to/from 125-131 Cowpasture Road. The applicant to review the proposed driveway location to minimise conflicts.

13. The applicant has proposed an interim treatment for the roundabout at the intersection of The Horsley Drive/Cowpasture Road to improve the level of service. As the Roads and Maritime Services is proposing to upgrade The Horsley Drive, between M7 Motorway and Cowpasture Road, the applicant needs approval from the RMS for the implementation of the interim treatment.

14. Longitudinal sections of the proposed driveways for service vehicles for Warehouse 1, 2, 3 & 4 shall be submitted for assessment.

15. B-Double vehicles entering into Cowpasture Road from the Access Road will have to cross double barrier lines at Access Road. This issue needs to be addressed.

16. There will be conflicts between B-Doubles entering and exiting warehouses 1 and 4 at the same time and is not appropriate.

Meeting between Council, Trust, DPE & RMS

Given the scope and nature of the above concerns Council requests that a meeting be convened between representatives of the Department and Trust to resolve the matters raised in this submission.

Given the nature of traffic concerns it is requested that the meeting also include representatives from the RMS.

Please contact the undersigned if you would like to discuss any of the above further

Yours faithfully

Andrew Mooney
ACTING MANAGER STRATEGIC PLANNING