



PCU022307

Your ref: 10_0129
10_0130
File no: 145-110-1/9

06 May 2011

Major Development Assessment
Department of Planning & Infrastructure
GPO Box 39
Sydney
NSW 2001



Attention: Chris Ritchie

Dear Sir,

Jacfin Horsley Park Project (10_0129 & 10_0130)

Blacktown City Council has considered the above major project/concept plan application lodged under Part 3A of the Environmental Planning & Assessment Act, 1979 and has prepared this submission to the Department of Planning and Infrastructure.

Council notes that the project is contained outside of the Blacktown City Council LGA, although vehicles associated with the construction works and ongoing operation of the site will primarily utilise roads within its boundaries for general access.

The direct impacts affecting land within the Blacktown City Council LGA relate to the additional noise and wear and tear associated with additional traffic associated with the development, as well as potential impacts on downstream water quality, flow and runoff (velocity and quality) of stormwater, as a result of the increased urban activity associated with the development.

Council requests that the following matters be taken into consideration in the Department's assessment of the application:

The site predominantly drains to Ropes Creek, which also flows through the Blacktown City Council LGA, in addition to the north-eastern part of the site that flows via an unnamed tributary of Ropes Creek. Council therefore requests that the Department carefully consider the proposal against the stormwater management objectives outlined in Council's adopted Eastern Creek Precinct Plan Stage 3, as prepared under Part 3 of State Environmental Planning Policy No. 59 (Central Western Sydney Regional Open Space & Residential).

In this regard, the following points are made:

Drainage/Water Quality

- Redistribution of catchment areas should be minimised to the greatest extent possible.
- Flow attenuation should be provided for the full range of Average Recurrence Intervals to ensure that the effective frequency of flooding is not increased. It appears that this is the strategy proposed.
- Flow frequency and runoff volumes should also be controlled to maintain waterway stability. Current Growth Centres also require waterway stability to be addressed in the form of a Stream Erosion Index Assessment. This issue should also be addressed as part of new development.
- The stormwater management strategy is used as the basis of development controls and as such should consider the cumulative impacts of similar development occurring in the Western Sydney Employment Area (WSEA). These cumulative impacts could result in increased peak flows that may require additional storage and discharge control requirements for the overall WSEA development to comply with the stated stormwater quantity objectives of 'no increase in flood flows'.
- The flood modelling should allow for a hydraulic roughness representing a fully restored riparian corridor and therefore the proposed flood levels may be higher than existing. Flood modelling for the tributary in the north-east of the site should also be provided.
- The pollutant reduction stated should be met, including all site areas. It is not clear from the documentation cited with this application whether any treatment of roof water is proposed.
- Rainwater harvesting should be maximised to the greatest extent possible to limit excessive runoff volumes into receiving waters.
- The Sustainability Report prepared by Worley Parsons states that the proposed stormwater management strategy will contribute to improvements in the long term health of Ropes Creek. Previous experience indicates that the proposed targets will limit the adverse impacts on receiving waters and will not necessarily result in an improvement in waterway health.

Construction

Given the site's proximity to residential properties, the impact of the proposed construction activities would need to be carefully considered in any conditions of consent, particularly in relation to minimising noise.

Trees/Landscaping

Council welcomes the reintroduction of *Syzygium paniculatum* (Magenta Cherry) to this location, noting that it is an endemic species to New South Wales, less common in modern times within the Sydney Basin. Council supports the introduction of native and, in particular, species endemic to New South Wales within the development site.

Easements

In order to improve the visual qualities of the area, Council requests that where possible, all new communications, electricity and other easements be provided underground and not within the airspace above. Figure 22 of the Environmental Assessment Report prepared by JBA Urban Planning Consultants Pty Limited (dated March 2011) is not clear in this regard.

Road Improvements/Maintenance

Given the extent of additional traffic utilising Old Wallgrove Road as a result of this development (during both its construction and operational stages), Council would seek to ensure that any relevant funding under Voluntary Planning Agreements or other monetary contributions (such as State Infrastructure Contributions) is sought from this development towards the upgrade and maintenance of Old Wallgrove Road, insofar as this is able to be achieved under the Environmental Planning & Assessment Act, 1979.

Conclusion

Blacktown City Council has assessed the Environmental Assessment Report and accompanying plans and technical papers. The key issues raised in this submission relate to water quality/stormwater and to a lesser extent traffic and noise. Council considers that, subject to appropriate environmental safeguards and the provision of appropriate infrastructure to service the development, the proposal is satisfactory, and appears to meet the relevant objectives of State Environmental Planning Policy (Western Sydney Employment Area) 2009, State Environmental Planning Policy (Major Projects) 2005, State Environmental Planning Policy No. 59 (Central Western Sydney Regional Open Space and Residential) and State Environmental Planning Policy (Infrastructure) 2007 and therefore raises no objections.

Should you require any further information regarding this matter, please contact Council's Team Leader - Subdivisions, Alan Middlemiss on 9839 6146.

Yours faithfully,



Judith Portelli

Manager – Development Services & Administration