

Your ref: SSD 8606 MOD 1
Our ref: MC-17-00001

23rd March 2018

Secretary
Industry Assessments
NSW Department of Planning and Environment
Level 22, 320 Pitt Street
GPO Box 39
Sydney NSW 2001

Attention: Thomas Piovesan

Dear Mr Piovesan,

Request for Comment - Public Exhibition of SSD 8606 - Marsden Park Warehousing and Light Industrial Estate, on Lot 23 & 24 Hollinsworth Road, Marsden Park

Thank you for your invitation providing us with the opportunity to provide submissions in response to the Environmental Impact Statement (EIS) Exhibition for the proposed State significant development application for the Marsden Park Warehousing and Light Industrial Development Estate at Lot 23 and Lot 24 DP 262886 Hollinsworth Road, Marsden Park.

We have reviewed the proposal and the recent follow-up emails from you and the applicant Logos. Several issues have been raised and are listed in **Attachment A** to this letter. It will be necessary that these issues are addressed to Council's satisfaction by the proponent before any determination of the proposal is made by the Department. It is evident there remains a number of outstanding matters in relation to the current proposal which were previously raised and which have not yet been resolved.

Whilst the modification MOD-17-00050 is still on foot, which proposes amendments to the existing road pattern including the relocation of Hollinsworth Road, and seeks to amend the approved subdivision pattern in DA-15-00275, we maintain that this SSD proposal is premature. Until the final road alignment for Hollinsworth Road is determined, there is no certainty as to the final boundaries of the subject development site.

We are also still concerned that the development exceeds the height plane for this site, and in its current iteration presents an excessively bulky, undifferentiated form with poor streetscape contribution to the adjoining residential area, including the adjoining caravan park to the north, and the nearby residential area of Oakhurst. DPE needs to be sure that the building mass presented by this development proposal will not adversely impact on the adjoining caravan park to the north, and the surrounding residential area. See our detailed comments attached.

If you would like to discuss this matter further, please contact Council's Senior Project Planner, Ruth Bennett, on 9839 6000.

Yours faithfully,



Judith Portelli
Manager Development Assessment

Enclosure: Attachment A

ATTACHMENT A

The following issues have been raised.

1. Planning

Under State Environmental Planning Policy (Sydney Region Growth Centres) 2006, Hollinsworth Road is zoned as SP2 Local Road. The applicant has submitted a modification application (MOD-17-00050) which includes in its proposal the realignment of Hollinsworth Road. It is recommended that this SSD proposal should not be determined prior to the determination of the modification application. The proposal is deemed premature and could change given the modification is undetermined. Of particular concern is the final road alignment, and the design of the roundabout providing the main access to this site, which is yet to be determined.

A detailed landscaping strategy to screen the development from residential uses across the road in the caravan park, and behind into Oakhurst is also necessary.

The applicant is to confirm in writing that the two high bays proposed within Building 3 are to have a maximum ridge height of 20m, and that the previous "future" high bay of 30m in building height is no longer being proposed.

2. Access & Transport Management - Traffic

Sufficient land must be set aside to allow future construction of the roundabout at the location of the intersection of Hollinsworth Road and the Bus only link road.

The one access to building 3 off Hollinsworth Road (extension) is located very close to the roundabout, and this access will create safety issues for turning vehicles, especially trucks. This access arrangement is not supported. The applicant is to provide clarification with respect to the discrepancies around this access arrangement, as two of the plans provided differ in what they show; refer to Dwg C102829.06-SSDA40, Issue C, 7.03.18, and Dwg LGMar DA30, Issue B, 6.03.18. Clarification on truck access from Building 3 to Hollinsworth Road is sought, and this access arrangement is required to meet Australian Standards and the requirements of Council's Access and Transport Management section.

The proposal is grossly deficient in terms of its car parking provision. The proposal is providing 57 per cent of the parking requirement required under Blacktown Development Control Plan 2015. The deficiency in car parking requirement is not supported.

3. City Architect's Comments

The proposed high bay part of the building exceeds the 16 metres height limit that applies to the site. Therefore the external appearance and form of the building requires careful detailing and materials selection. This is in order to contribute positively to its surrounding context, and to not have an adverse impact on the intended scale and character of the area, in addition to minimising the impact of the development on the neighbouring R2 Low Density Residential zone.

The building façade does not achieve anything beyond the norm and a building of this nature, which has a significant breach in the height limit, should provide design excellence and improved character of the precinct. The proposal in its current form does not contribute positively to its context. Its presentation to the road and to the residential neighbourhood to the south presents as a blank overbearing façade, with no relief or visual interest, and will have a negative impact on the streetscape due to poor articulation. The applicant is to provide updated façade treatment to alleviate these concerns and provide greater differentiation in materials and treatments. The high bay section at the south-eastern corner could be relocated within the building footprint, instead of being on the periphery, in order to reduce its dominance on the streetscape.

Any signage on the facades should be positioned up to a maximum of 16m above the NGL, in keeping with the maximum height control for the site, i.e. no signage should be positioned on the high bay element.

The perimeter landscaping is also critical to enhancing the character of the area and 'screening' the building. We would expect to see significant large scale tree species selected for the site with established/semi-mature trees planted upon completion, in order for the landscaping to have an immediate impact. Landscaping to the southern boundary is of critical importance as it will provide the buffer between the industrial zone and the nearby low density residential zone. The revised landscape strategy needs to reflect this.

4. Drainage Engineering

We have significant problems with the submission. See comments below.

1. There is no electronic drainage or water quality models DRAINS or MUSIC for Council to assess, review or check to verify the details nominated in the submission. These need to be provided to Council and additional time to review the models with the plans.
2. The Engineering Report SSD 8606 by Costin Roe Rev A needs to be revised to address the following:
 - a) Section 4.1.2 p.15 the report incorrectly directs the runoff from lot 3 to the rear RMS land. The front part of lot 3 is to go Hollinsworth Road to match the pre development flow patterns. The rear section of lot 3 is to go to a new 100 year private pipeline within the private drainage easement over the downstream properties as required by conditions 7.18.6.8 and 7.18.6.9 of DA-15-275. These conditions prevent development upon propose lot 3 until the drainage easement and pipeline is constructed. There is no legal discharge point for the drainage to the rear and there is no allowance within the channel section within lot 1/DP 1176437 or the culvert under Langford Drive to cater for these additional flows. Provision has already been made in the design of the trunk drainage line within Langford Drive to accommodate these flows. The temporary OSD would remain until Basin G is complete.

- b) Amend section 4.1.3 p. 16 and Section 5.1 p.21 note that water draining to the north the temporary OSD is to remain in place until both Basin E is complete AND the trunk drainage connection from Hollinsworth Road to the basin is also complete.
 - c) Under section 5.2 it the increased runoff from the Hollinsworth Road extension is not being compensated for through OSD. Additional OSD is required or the on lot temporary OSD compensate for the bypass from the Hollinsworth Road extension.
 - d) Amend section 6.3.7 to require hydrocarbon removal as per Part J. A baffle is required 250 mm upstream of the Stormfilter weir and extending from the soffit to 400 mm below the weir is required to retain the hydrocarbons. Extend the weir sufficient length to ensure $L \text{ (m)} > 10 \times Q_{100} \text{ (m}^3\text{/s)}$
 - e) Section 6.5 Stream Erosion Index p. 32 **IS** required contrary to the statement in this section. The reference is to the older parts of Blacktown subject to BCC DCP 2015. As this site is under the Growth Centres DCP the SEI < 3.5 continues to be required as previously advised to Costin Roe.
3. On Costin Roe Drawing Co1289.06-SSDA43(B) the front portion of the lot is to go Hollinsworth Road to match the pre development flow patterns. The rear portion of lot 3 is NOT to discharge to the RMS land but obtain a legal right of discharge along the boundary within the downstream properties of Lot 22 in DP 262886 and Lot 1 in DP 1176437 to the allocated SP2 drainage land in Basin G.
4. Costin Roe Drawing Co1289.06-SSDA45(B) is to be revised as follows.
- a) The configuration of the Stormfilters means they will fail to operate as modelled and will cease functioning as water rises in the tank. The preferred method of operation is for the base level of the Stormfilter false floor to be raised to a minimum of the 2 year storage level in the OSD tank. Alternatively the underdrains from the Stormfilters are to discharge (bypass) to a new overflow pit downstream of the current orifice controls. The orifice sizes need to be reduced to compensate for this bypass. See spreadsheet from Stormwater 360 to assist for flows at varying storage levels.
 - b) At "Typical Filtration Chamber Detail" show the impermeable hydrocarbon baffle 250 mm upstream and extending from the tank soffit to 400 mm below the weir level.
 - c) At "Typical Filtration Chamber Detail" reduce the energy dissipater height to 600 mm. Amend note on "Concept Stormwater Management Device Configuration" as well.
 - d) On the "Concept Stormwater Management Device Configuration" there are insufficient access grates for the below ground detention tank. Access grates to the below ground detention tank and Stormfilter 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, 5 m for clear heights less than 2.5 m and 6 m for clear heights greater than 2.5 m.
 - e) On the "Concept Stormwater Management Device Configuration" increase the length of the Stormfilter weir. 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. $L > Q_{100} / (0.4 \times 0.25)$) in m, where Q_{100} is in m^3/s). Provide calculations.

- f) On the "Concept Stormwater Management Device Configuration" to contain hydrocarbons ensure all walls surrounding the Stormfilter chamber are full height except at the weir itself.
 - g) On the "Grated Drain/Stormwater Pit with Enviropod Configuration" delete the 400 and 350 measurements on the right side of the pit. Reconfigure the dimension "500 MIN." from the base of the grated drain to the pipe obvert.
 - h) At "Typical Outlet Configuration" set the fall of the tank base as 2% minimum and recalculate tank dimensions. Delete the sump and mortar in the orifice plate.
 - i) Provide specific plans for every individual OSD and Stormfilter system.
5. Costin Roe Drawing Co1289.06-SSDA651(C) is to be revised as follows:
- a) At section 1 the underside of the retaining wall footing is to extend as a minimum to below the underside of the easement pipe to enable full safe excavation of the easement for pipe maintenance.
 - b) At the Tiered Earth Wall configuration safe person access is required at regular intervals to enable maintenance of the landscaping in the central tier. Provide note and detail.
6. In view of the above issues, amended modelling and drainage plans are required to address the major issues above.