



Your ref: SSD 9667
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Department of Planning Industry and Environment
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SYDNEY NSW 2001

Recipient Delivery william.hodgkinson@planning.nsw.gov.au

Attention: William Hodgkinson

Dear Mr Hodgkinson

SSD 9667 - Light Horse Interchange Business Hub, Eastern Creek

Thank you for your correspondence dated 12 February 2020 requesting our advice on the Response to Submission for the Light Horse Interchange Business Hub at Eastern Creek, 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, unfortunately, we still object to the proposal in its current form until all our key issues listed in **Attachment A** to this letter are addressed to Council's satisfaction. We request that once further information is provided by the applicant that we are given another opportunity to comment on the new information before any determination is made.

If you would like to discuss this matter further, please contact Judith Portelli, Manager Development Assessment, on 9839 6228.

Yours faithfully

Glennys James PSM
Director Planning and Development

Connect - Create - Celebrate

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Blacktown Council's submission to SSD 9667 - Light Horse Interchange Business Hub, Eastern Creek

Issues to be addressed:

Planning Issues

1. Council does support the proposed access road to be dedicated to Council as stated within the engineering reports. The proposed road is to remain as a private road as there is no public or council benefit to make this a city asset.
2. The car parking bays on Lots 2, 3 & 4 are required to connect to the car entry/exit points so that dead end car parks are avoided wherever this opportunity arises.
3. Lot 7 is required to provide an additional entry/exit point off the car park for warehouse 7B towards the north-east corner of the proposed lot so it has a secondary access point in the event of an emergency.
4. Swept paths are to be provided that demonstrate that all the proposed building footprints can be adequately serviced by B-Double trucks.
5. The applicant still proposes to adopt the RMS parking rates of 1 space per 300 m² for warehouse/distribution and 1 space per 40 m² for any ancillary office space. This assumes warehouses will only ever use these premises.

The RMS Business Park rates within the Guide to Traffic Generating Developments for an industry is 1.5 spaces per 100 m² of GLA and 1.8 spaces per 100 m² GLA for office/showroom leasable factory/warehouse (where information on component development is available).

As previously raised, the proposed rates are not consistent with the rates applied in Eastern Creek Precinct Stage 3 (across Wallgrove Road) which is 1 space per 100 m² of GFA up to 7500 m² and for greater than 7500 m² it is 1 space per 200 m² for that part of the floor space that is over 7500 m².

In addition, the recent Ropes Crossing Precinct DCP car parking rates of 1 space per 100 m² for industry/warehouse/distribution and 1 space per 40 m² for the office component was exhibited and is currently under consideration by DPIE.

Consequently, we are unable to support a masterplan for buildings that nominate floor spaces for building footprints that have not been the subject of detailed assessment, especially as the building footprints are based on the parking rates in the EIS that assume warehouse uses only, when industrial uses could also be conducted on this site now or in the future.

6. The indicative footprints still represent an overdevelopment of each site, which will be used as a marketing strategy where the prospective lessee would expect to build the nominated floor areas in accordance with the masterplan where insufficient car parking is provided to cater for all permitted uses.

Traffic Issues

1. The revised SIDRA modelling for the 2036 scenario (background growth and development) still shows a queue of 403 m (54 vehicles) along the Doonside Road

approach to the traffic signal at the GWH/Doonside Road / Brabham Drive intersection, which is excessive.

2. Council's view is that an additional left turn lane, as proposed previously, must be provided on the north approach (Doonside Road) to the GWH. That lane will improve the operational performance of the intersection. A concept design needs to be developed, including costing. The proponent for this development should pay all costs of their improvement works.

Drainage Issues

1. Engineering plans from Henry & Hymas Job 18652_SSDA (07) dated 24.01.20 need to be amended as follows:
 - i. A service bay is required for each Gross Pollutant Trap (GPT) on the access road to Ferrers Road. Provide a GPT service bay a minimum 15 m in length and 3.6 m in width clear of the carriageway, to allow access for maintenance and cleaning by Eductor truck without need for traffic management provisions.
 - ii. Provide the outlet invert levels of all the GPTs.
 - iii. All GPTs are to be proprietary type with oil baffle and not graduated trash systems as proposed for the southern bioretention.
 - iv. The southern bioretention is to have a twin GPT in parallel configuration using twin Rocla CDS 3024 types rather than a single graduated trash system.
 - v. GPT WQ-2 is to be a minimum CDS 2018.
 - vi. GPT WQ-13 is to be a minimum Rocla CDS 0708 sized for a 6 month flow of 0.03 m³/s.
 - vii. GPT WQ-14 is to be a minimum Rocla CDS 0708 sized for a 6months diversion flow of 0.06 m³/s.
 - viii. GPT WQ-15 is to be a minimum CDS 1012 model sized for a 6months diversion flow of 0.12 m³/s.
 - ix. GPT WQ-16 is to be a minimum CDS 1009 model sized for a 6 months diversion flow of 0.076 m³/s.
 - x. Lot 1 is to have a minimum 200 kL rainwater tank, Lot 2 is to have a 100 kL rainwater tank, Lots 3 & 4 are to have a 150 kL rainwater tank each, Lot 5 is to have a 200 kL rainwater tank, Lot 6 is to have a 125 kL rainwater tank and Lot 7 is to have a 225 kL rainwater tank. All the above are inclusive of the 20% loss.
 - xi. Swales as a treatment device are not acceptable to Council. These are to be pit insert GPT arrangement if required such as OceanGuards or equivalent. On the other hand this area can be bypassed in the MUSIC model.
 - xii. All proposed Kerb Inlet Pits (KIP) are to be 1 m clear of any services, power poles and driveways.

- xiii. Temporary bioretention details as per WSUD Dwg. A(BS) 175M Sheet 14. Stage 2 is required at completion of road construction and stabilisation of lots.
 - xiv. Sag pits are to have 2.4 m lintels and centrally placed as per Council's Engineering Guide.
 - xv. The spillway is to be designed to cater for the PMF event with scour protection and ensuring the stability of the basin wall. For rock spillways the centre of the spillway is to provide a concrete cut-off wall extending a minimum of 750 mm below the weir level and extending the full width of the weir to reduce seepage flows
2. The basin details shown in Dwg. C107 (06) are to be modified by:
- i. The twin Rocla CDS 3024 in parallel are to be designed to direct only the treatable flow (2.31 m³/s) to the bioretention basin. All flows in excess of the treatable flows are to bypass the bioretention and discharge directly to the detention basin.
 - ii. Widen the top of the berm to a minimum of 2 m.
 - iii. Provide a minimum 3.5 m wide concrete heavy-duty accessway from the roadway to enable maintenance access by eductor truck to the twin CDS 3024 GPTs. Provide a turning area supported by turning circles for an 11 m rigid vehicle to ensure entry and exit is in a forward direction.
 - iv. Demonstrate that maintenance access by an eductor truck to the WQ-2 GPT over a 3.5 m wide heavy-duty access with appropriate grades (<10%) and turning circles are actually achievable. Where this access for frequent maintenance access at 3 to 4 month intervals is not practical, then provide an alternate access through Lot 7.
 - v. Reduce the width of the filter area to 15 m and provide dimensions to demonstrate that the filter area of 2,300 m² can be achieved clear of pits and scour protection.
 - vi. Increase the longitudinal low flow swale noted as "V" within the basin to 0.5% minimum.
 - vii. Relocate the 1500 dia. pipe fully onto Lot 6.
 - viii. Provide triple non-permeable 300 dia. pipes from the surcharge/silt trap to the first upflow pit on each side.
 - ix. Provide double permeable 300 dia. pipes between the next three pits (two sets of two pipes).
 - x. Adjust pipe flow pit sizes to allow for the multiple pipes.
 - xi. Provide pit numbers for all the pits within the bioretention/detention basin.
 - xii. Delete the 600 dia. pipe from the subsoil outlet on the large bioretention basin to WQ-8 and replace with the 375 dia. @0.5% minimum.

- xiii. Delete the 450 dia. pipe from the subsoil out on the small bioretention to WQ-12 and replace with a 225 dia. pipe @0.5% minimum. Adjust custom headwall at outlet to suit.
- 3. On Dwg. C240(05) in the "Typical Upflow Outlet Pit" delete the sump.
- 4. On Dwg. C241(05) manually calculate a 1.5 yr orifice based on a net discharge of 1188L/s at the 1.5 yr weir height allowing for bioretention subsoil bypass.
- 5. Provide a revised landscape plan by Site Image Job number SS18-3892 dated 24/1/2020 to extend the landscape works for the vegetated riparian corridor to a minimum average of 20 m outside the creek banks of the relocated Eskdale Creek up to and including the confluence with Reedy Creek. Where 20 m cannot be achieved on one side, it is to be compensated on the other side of the creek. The vegetation is to be generally in accordance with the Biodiversity Development Assessment Report (BDAR) – prepared by Eco Planning 2019.
- 6. Within the modified Eskdale Creek environment detail the weed removal, revegetation and management of the retained vegetation in a Vegetation Management Plan (VMP). In particular, the VMP is to include details for the revegetation of the Vegetated Riparian Zones (VRZ) for Reedy Creek and Eskdale Creek, which are outside of the WSPT Plan of Management – Bushland Corridor areas. Extend the works to include the average 20 m buffer area outside the creek banks.
- 7. The 'Creek Alignment Design Report' prepared by Henry & Hymas Project No. 18652 dated 24.01.20 is to be amended to address the following:
 - i. Amend Dwg. SK14(01) and the drainage outfall notes on page 21 by deleting the 900 mm pipe and providing a rock lined open channel with intermediate pond discharging from the invert designed to match the deep water pond overflow down to the toe rock within Reedy Creek to enable continuity of the two drainage systems.
 - ii. Increase the limit of landscaping vegetation width to an average of 20 m each side of the creek banks including the connection to Reedy Creek. The proposed width is substantially undersized.
- 8. Revised subdivision plan is required from LandPartners SY074519.000.2(8):
 - i. To show the access road as its own Lot 11. Excluding the minimum area required for dedication of the arm of the roundabout at Ferrers Road to Council.
 - ii. Extend pit 10 along the northern boundary from the edge of the road batters (Lot 11) to the M4 boundary up to Eastern Creek.
 - iii. Extend Lot 1 along the northern boundary from the bottom.
 - iv. Extend Lot 1 along the northern boundary from the bottom of the road batter to the M4 boundary up to Eastern Creek.