



Your ref: SSD 9667
File no: MC-18-00004

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

10 September 2019

By email: 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 7 August 2019 requesting our advice on the proposed 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 we object to the proposal in its current form until our key issues listed in **Attachment A** to this letter are addressed. 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 on 9839 6228.

Yours faithfully

Glennys James
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

Matters to be considered and addressed:

Planning matters

1. The comments made in all strategic documents, including the Greater Sydney Regional Plan and Central City District Plan, are too general in nature and need to explain how they have been addressed in this proposal.
2. The EIS should specify the objectives and priorities in the strategic plans that the EIS complies with.
3. The Urban Design Guidelines adopts the RMS traffic rates where the parking rates should be the same as that applied in Eastern Creek Precinct Stage 3 (across Wallgrove Road) which is 1 space per 100 sqm of GFA up to 7500 sqm and for greater than 7500 sqm it is 1 space per 200 sqm for that part of the floor space that is over 7500 sqm.
4. 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.
5. There is insufficient detail about the building footprints, including how access to docks by B-double trucks will be provided. The indicative footprints represent an overdevelopment of each site. We are only prepared to support a subdivision masterplan provided the driveways and car parking are consistent with the reciprocal rights of way.
4. This proposal covers Stage 1 and so more information is required as to what will be in Stage 2 and how it fits in with the Masterplan.
5. More information is required on the approval process for the construction and use of each building and who will be the consent authority.
6. The building concept plan is not clear about what appear to be ramps. More information is required on the ramps proposed in front of each warehouse as indicated on the Concept Masterplan.

Traffic matters

We make the following comments:

1. It is noted that the largest heavy vehicle to service the future lots is B-Double. Vehicular access to individual lots must cater for the manoeuvring of B-Doubles. A condition of Consent should be imposed requiring compliance with AS 2890.1 and AS 2890.2 prior to the issue of a Construction Certificate.

2. It is noted that the Emergency Access Road is proposed to be 6 m wide. This complies with the minimum carriageway width required by NSW Fire & Rescue.
3. It is noted that all access roads will be constructed to a carriageway width of 15.5 m which complies with Blacktown City Council's Development Control Plan.
4. All carpark and loading area access should be constructed in full compliance with the appropriate Australian Standards, specifically AS 2890.1 and AS 2890.2. Swept path analysis for individual hardstand (paved area for heavy vehicle parking) must be undertaken during future stages to accompany the design development of that future built form on each lot, at that time.
5. It is noted that the trip generation rates used in the report are based on the RMS TDT13/04a data, which is acceptable.
6. SIDRA analysis for various intersections indicated excessive delays at the GWH / Doonside Road / Brabham Drive intersection. The report suggested an additional 70 m lane should be provided on the north approach (Doonside Road) to the GWH, to be dedicated as a left-turn only lane. That lane has improved 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 suggested improvement works.
7. Parking should be provided in accordance with the Blacktown City Council Development Control Plan 2015.
8. Shared pedestrian and cyclist access from Wallgrove Road and Ferrers Road should be provided, including the new access road for this development. Shared paths should comply with the latest State Government guideline(s).

Drainage matters

The proposal is generally in accordance with Council guidelines and standard drawings. However, the comments below highlight matters that will need to be addressed to ensure that the systems function correctly.

Operational Strategy

1. On the proposed subdivision plan, Lot 8 contains the On-site Stormwater Detention (OSD) basin and water quality bioretention. Please advise who will own and maintain this, as Council will not accept ownership or maintenance. Is this to be community title or owned outright by Western Sydney Parklands?

Flooding

2. Provide the Tuflow model used to analyse the flooding on the site.
3. The provided flood report does not show minor contours to make a proper assessment. Provide at minimum minor 0.2 m contour levels across the 'Change in Peak Flood Level' for both the 1% and the Extreme Event. The current impact flood maps show major contours only of 1 m.
4. In chapter 4 of the flood report it is noted that 'The access road linking the development lots to Ferrers Road across the Eastern Creek floodplain has a minimum 1%AEP flood immunity'. Please provide 1% flood contours in the vicinity

of the access road to confirm this. A continually rising route has not been provided - on the contrary, 2 sag locations are evident from the long section and plans.

5. The M4 is considered a major flood evacuation route from Western Sydney. Provide additional modelling to demonstrate no adverse impact over the M4 in a 1:500 year ARI event.

On-site Stormwater Detention (OSD)

6. Provide orifice details.
7. Show the bench OSD floor to invert of orifices and pipes on the OSD section provided. Refer to Council's WSUD drawings.
8. The OSD orifice outlets (450 mm void and the 900 mm dia. pipe) should be changed so that the 450 mm voids are to be upgraded to three dia. 675 mm pipes and the dia. 900 mm pipes upgraded to three 1050 mm pipes.

WSUD

9. Provide the MUSIC model used to achieve the water treatment targets and water conservation reuse for the site.
10. Provide Gross Pollutant Trap (GPT) calculations. This can be provided by the manufacturer - contact ROCLA for further information. The GPT should be designed for a minimum 6 month flow (75% of the 1 year ARI) and must contain an oil baffle. The device is sized to ensure the Treatment Flow Rate matches or exceeds the 6 month flow, but only direct the 3 to 4 months flow to the basin. Show levels on the provided GPT detail including weir level. Show section views of the GPT. The provided GPT drawings are to be incorporated as part of the stormwater concept plans.
11. Council does not approve of treatment pit inserts within Council roads (to be dedicated) such as pit P-1 and others. Detail how the roads are being treated as no MUSIC model or report accounts for this.
12. In the Civil Engineering report, chapter 6, it is noted that a bioretention size of 2,620 sqm is required. However only 2,420 sqm in bioretention area has been provided.
13. In the MUSIC model (civil engineering report, Chapter 6, Figure 6.6) it does not account for any bypass, although the catchment and OSD spreadsheet for the site shows bypass areas.
14. Provide section drawings with details of the northern bioretention (400 sqm).
15. The submerged zone of the bioretention is to be at minimum with the 2 year flood level.
16. The southern bioretention is to be designed as per Council's WSUD drawings for large systems. This will require 4 upflow pits with permeable concrete pipes as per sheet 3 of A(BS)175M.
17. Water quality is required for the new road access from Ferrers Road.
18. Provide an electronic version of the MUSIC model.

Drainage

19. The proposal to divert the creek will need a separate report to outline the design, access for maintenance and the design parameters used.
20. GPT eductor truck requires a max 3% parking grade for access and cleaning of the GPT.
21. GPT levels and method of sizing is required.
22. The bioretention volume up to the EDD is not to be part of the OSD volume.
23. Provide the OSD spreadsheet electronically.
24. The outlet invert from the GPT to the bioretention is to be greater than the bioretention Extended Detention Depth (EDD). The diversion weir for both GPTs is to be designed for the 3 to 4 months flow.
25. The proposed maintenance paths are not adequate. Show turning paths on the proposed maintenance access tracks to the GPTs, OSD and the proposed bioretentions. A 9 m service truck will need to be simulated.
26. The 1050 mm pipe carrying the overland flows from the M7 underpass discharges to the former Eskdale Creek line as noted on Dwg. No. C107. This should be discharging to the realigned creek location.
27. The 1200 mm dia. pipe running from pit L-10 to the northern bioretention in Dwg. No. C105 will be registered as an easement. Consider a 3.0 m wide easement and its potential to affect any nearby structures, especially adjacent to pit L-4. No structure is permitted on easements.

Section 7.11 matters

The proposed development is not on land subject to any Section 7.11 Contributions Plan in Blacktown. As such, the developer is to provide all local infrastructure required to meet the demand of its development in terms of Traffic and Transport impacts and Water Management (quantity and quality) to mitigate downstream impacts.

Ecology

1. All mitigation measures included in Section 6.3 of the BDAR are recommended to be placed as a condition of consent of the development. Additionally, the revegetation and management of the retained vegetation is to be detailed in a Vegetation Management Plan (VMP) or similar. In particular, the VMP is to include the 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.
2. A print-out from the BAM Calculator should be attached to the BDAR.

Environmental Health matters

A Site Audit Statement must be prepared for the site, which can be conditioned:

A Site Audit Statement is to be obtained from a NSW Environment Protection Authority accredited Site Auditor. The Site Audit Statement must confirm that the site has been remediated in accordance with the approved Remediation Action Plan and that the site is suitable for the proposed use.