



Your ref: SSI 10048
File no MC-20-00001

16 September 2020

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

Recipient Delivery jonathan.kerr@planning.nsw.gov.au

Attention: Jonathan Kerr

Dear Mr Kerr

SSI 10048- Sydney International Speedway, Eastern Creek

Thank you for your correspondence dated 19 August 2020 inviting us to provide comments/conditions for SSI 11048 Sydney International Speedway at Ferrers Road, Eastern Creek.

The Sydney International Speedway Environmental Impact Statement August 2020 has been reviewed and we have identified the key issues listed in **Attachment A** to this letter. We request that these matters be addressed and the necessary information forwarded back to Council for our reconsideration before any conditions can be provided.

If you would like to discuss this matter further, please contact our Senior Planner, Kelly Coyne, on 9839 6000.

Yours faithfully

Judith Portelli
Acting Director Planning and Development

Connect - Create - Celebrate

Council Chambers - 62 Flushcombe Road - Blacktown NSW 2148

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All correspondence to: The Chief Executive Officer - PO Box 63 - Blacktown NSW 2148

Blacktown City Council submission to proposal request for SSI 10048

Planning and Development

1. No plans or details have been provided to ensure a minimum landscape setback of 7.5 metres is provided to Ferrers Road or whether a landscape buffer is provided between the speedway and dragway.
2. No details have been provided to ensure that a minimum of 50% shading will be provided for the pavement of the car parks to reduce urban heat effects.

Traffic and Engineering

1. The Technical Paper covered both construction and operation phases of the project.
2. We noted that the parking in the order of 2820 spaces will be available when the works is completed which includes overflow parking. This amount of parking is considered adequate based on the information provided in the Technical Paper (TP) provided no concurrent events are undertaken in other facilities within this precinct and with an agreement that all available parking spaces will be used by the patrons of this facility only. Council requires clarification that this arrangement is acceptable to the other users and operators at SMSP.
3. An assessment of traffic conditions in 2032, 10 years from the anticipated opening date was included in the TP. We noted very small increases in traffic volumes in the road network in the 10 year period. Applicant needs to explain how they arrived at such a small anticipated increase in traffic flows.
4. Whilst the Technical Paper (TP) covered both construction and operation phases of the project however it has not made any comments on the key concerns previously raised by Council including:
 - a) Consideration of increasing Ferrers Road capacity by increasing number of traffic lanes to ease congestion specially during major events.
 - b) Safety at the existing and proposed new access points.
5. No draft Civil Engineering Design/Drawings or concept plans have been provided for the upgrade of the Intersection or entry of the proposed site in order to enable Council to provide comments on them.
6. The Technical Paper needs to address any planned future upgrade of Ferrers Road. This is a very high trafficable road connecting other suburbs, also providing access to the whole of Sydney Motor Sports Park and this expanded facility.

Environmental Health

Dust Issues

No draft dust management plan has been submitted to address dust the likely plumes that will arise from the operation of the speedway and its impact on the Sydney Motor Sports Park (SMSP) overall operation. Details of proposed that monitoring stations, screening

and an operational management plan (OMP) to address dust suppression issues have not been submitted. We request that we are able to review the draft management plan and provide comments on it that can then be incorporated in the final OMP.

Noise and Vibration Technical Paper

The proposal will result in the increase in motorsports noise to the area and despite such noise regarded in the technical paper as being “a feature of the areas for over 30 years” Council’s Environmental Health Section do receive noise complaints in this regard. The Noise and Vibration Technical Paper confirms there may be instances in which noise criteria may be exceeded at the nearest receivers during some of the noisiest events.

The applicant proposes to deal with this in a noise measurement plan. We request to be able to review this draft plan.

The EIS has not considered sleep disturbance as it assumes all events are proposed to be completed by 10pm, there is no consideration given to what will occur in the instance an event runs late.

Considering the above, we need to know what the clear hours of operation are proposed and that we be able to comment on the draft noise management plan.

S7.11

The project site and the alternative sites are not subject to any Blacktown City Council contributions plan or Voluntary Planning Agreement. As such, the applicant will be required to ensure Water Management is dealt with on-site and off-site traffic management impacts are addressed by upgrading roads and traffic control measures, if modelling shows that additional traffic in the locality is going to be created by this development.

Biodiversity

We have reviewed the Technical Paper 3: Biodiversity Development Assessment Report provided by Jacobs July 2020, and provide the following comments:

1. The report does not provide additional impact assessment provisions for the potential SAIL entity ‘Cumberland Plain Woodland’ as required in accordance with Section 10.2.2 of the BAM.
2. It is unclear how the remaining native vegetation is going to be managed. Whilst it is noted that the Construction Environment Management Plan (CEMP) will include a Flora and Fauna Management Plan, this typically only details actions during the construction period. The retained areas of native vegetation on the site, specifically the central area of EPBC listed CPW and the drainage channel of River-flat Eucalyptus Forest needs to be conserved in-perpetuity, with initial works to mitigate the proposals impacts for the first five years. These works are required to be addressed in a site specific Vegetation Management Plan (VMP). The VMP is also to include habitat enhancements and monitoring of Cumberland Plain Land Snail (*Meridolum corneovirens*) and Southern Myotis (*Myotis macropus*) during this period.
3. The landscape plan is required to include the details of the trees proposed to be removed and the streetscape interface along Ferrers Road.

Drainage

Information is required on the following:

On-site Stormwater Detention (OSD) system

1. Permanent OSD is required for the development site.
2. Design the OSD to the requirements of Council's Water Sensitive Urban Design (WSUD) Standard Drawings Plan No. A(BS)175M and the 'OSD Deemed to Comply Tool Spreadsheet' (latest version available from Council).
3. Provide an OSD catchment plan
4. Refer to Council's WSUD Developer Handbook for further design considerations.

Water Sensitive Urban Design

5. Permanent water quality treatment is required for the development site.
6. Council accepts bio-retention systems to satisfy the water quality requirements. This is provided by using MUSIC to assess the performance of the water quality systems and provide an electronic copy to Council for assessment. Alternatively, the water quality can be addressed using proprietary products.
7. Refer to Council's WSUD Standard Drawings, Plan No: A(BS)175M and WSUD Developers Handbook.
8. Refer to Section 4.2 of Part J of DCP 2015 for load reduction requirements.
9. Provide a MUSIC catchment plan comprising a land-use plan and a separate water quality device plan if on-lot water treatment is proposed (this can be combined only if the arrangement is simple).

Water Conservation

10. Water conservation is required for the business/commercial development.
11. A Rainwater tank is required to meet the water conservation targets. A minimum of 80% of non-potable water demand for the development is to be met through the reuse of rainwater. Non potable water demand is to include landscape watering and toilet/urinal flushing.
12. MUSIC is generally used to assess the performance of the rainwater tank using the node water balance and an electronic copy of the MUSIC model needs to be provided to Council for assessment.
13. Draft MUSIC modelling guidelines including water usage rates for Blacktown are available through the WSUD Developer's Handbook.
14. Allow for a minimum usage rate of 0.1 kL/day/toilet or urinal and a minimum of 0.4 kL/m²/ year for landscape watering (excluding turfed areas).
15. Where the development is used 5days/wk, the toilet/urinal usage can be discounted by 5/7.
16. Allow for a 10% loss in rainwater tank size volume in MUSIC to that shown on the design plans. e.g. where a 50kL tank is modelled, construct a 55kL tank.

17. All calculations (number of toilets etc.)/graphs/catchments and models are to be provided.

Engineering

18. Submit engineering concept plans and any electronic modelling/reports undertaken. Furthermore, Include Councils engineering requirements as a summary note on the engineering plans e.g. OSD required/not required and whether temporary or permanent etc. Include design summaries where needed.