

Department of Planning, Industry and Environment
Parramatta Square, 12 Darcy Street
Parramatta NSW 2124

Our Ref	NCA/3/2020
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17 December 2020

Dear Mr. Koppers,

COUNCIL SUBMISSION

SSD 10459 – CENTRAL SYDNEY INDUSTRIAL ESTATE AND DOWNER SUSTAINABLE ROAD PRODUCTS COMPLEX

I refer to the above application and the request to provide advice on the proponent's *Response to Submissions*. Please see Council's comments below.

Previous Reasons for Objection

- **Riparian Corridor (40m)**

Council officers are satisfied that this issue has been satisfactorily addressed. Any consent granted should incorporate conditions that confirm the details of the proponent's proposal to provide a 40m riparian corridor consistent with the averaging rule as set out in the Office of Water, Guidelines for Riparian Corridors on Waterfront Land.

- **Contribution offsets**

Council officers are satisfied that this issue has been satisfactorily addressed based upon the following and as provided within the *Response to Submissions*:

- The construction and dedication of the future road form part of this approval and is to be at no cost to Council
- The provision of a public access easement along the foreshore riparian corridor form part of this approval and is to be at no cost to Council
- The provision of an easement (and future dedication) of the new road extension for the bridge link form part of this approval and is to be at no cost to Council.
- No contribution offsets are provided for the above matters
- The proposal will require the payment of developer contributions in accordance with the City of Parramatta S94A Development Contribution Plan (Amendment No.5). A cost of development works calculated in accordance with Clause 25J of the EPA Regulation 2000 should be prepared by a suitably qualified quantity surveyor. A condition is imposed requiring the payment of developer contributions in accordance with Council's contributions plan.

Until such time as Council's legal team can review the terms and conditions of the subdivision and the Section 88B, Council does not support the approval of the draft legal

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documentation for the terms and conditions of the subdivision where public access or public assets are involved. This matter is to be further discussed and agreed to by Council. It is also noted that Council will not indemnify privately owned property.

- **Insufficient Information**

It is noted that a full architectural package has not been provided with the application demonstrating sufficiently notated floor plans (eg. RLs), sections and elevations. The Department will need to be satisfied that sufficient information has been provided to carry out a proper assessment of the application.

Providing the above matters are covered by appropriate conditions of consent and the Department can appropriately assess the application based upon the information submitted, Council withdraws its formal objection to the proposal.

In addition to other matters previously raised, and contained within the Response to Submissions document submitted, Council requests the following be taken into consideration during the assessment of the application.

AMENDED APPLICATION

Concern is raised that the application has been significantly amended through the *Response to Submissions* (notably a change from an 8 lot subdivision to a 14 lot subdivision) and Council officers have not had sufficient time to adequately assess the impacts of this amended proposal. No comments are therefore provided on the amended subdivision application.

LAND USE PLANNING

Consistencies with the Draft Camellia Town Centre Masterplan

As previously noted, the proposed development is consistent with the Draft Camellia Town Centre Masterplan 2018 as the project will facilitate some of its objectives by providing a public road which could link Camellia to Silverwater via a future bridge over Duck River and the riparian zone along the Duck River foreshore for a pedestrian/cycle path.

However, the "Placed-based Infrastructure Compact" (PIC) prepared by the Greater Sydney Commission has raised uncertainty about the future development direction of Camellia due to the high infrastructure cost of the precinct, and therefore the draft Camellia Town Centre Master Plan (2018) may be subject to revision following a decision of government regarding the development potential of the precinct. It is likely that further work will need to be carried out to ascertain the type and extent of development that can be accommodated in Camellia in the future following finalisation of the PIC. While such uncertainty remains around the future development potential of Camellia, any development proceeding under the current development framework should be mindful of the potential change to the context of the area.

URBAN DESIGN (PUBLIC DOMAIN) MATTERS

The following comments are requested to be included in the assessment of the application prior to any application approval:

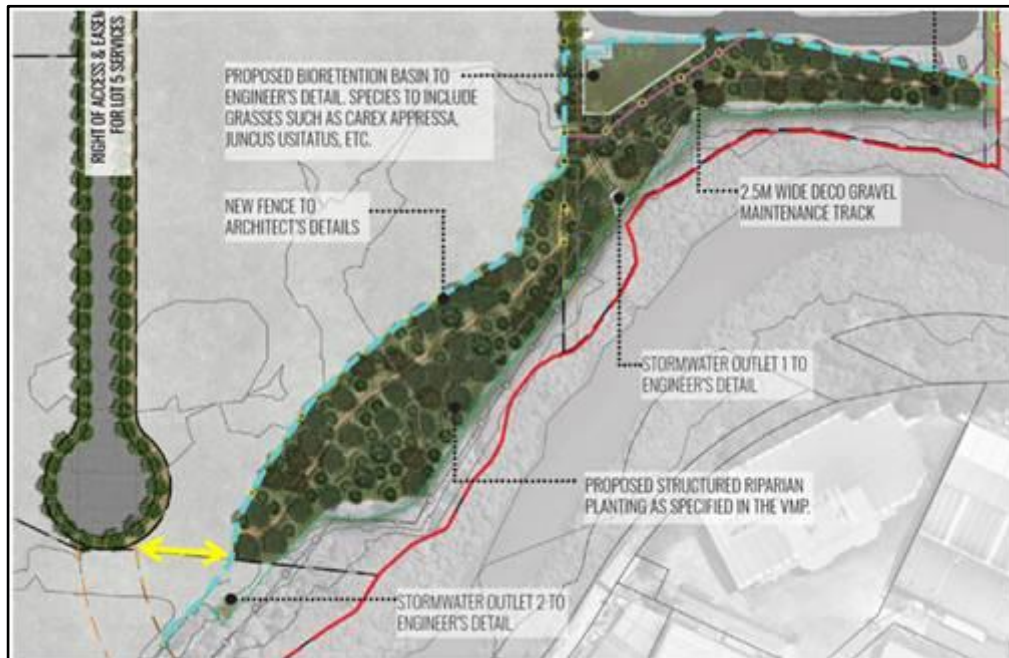
- The new entry road is to be designed as a public road using minimum kerb radii to achieve required swept paths, central road median removed, general road cross-section dimensions including footpath, verge, car parking, travel lanes. The set out of the western side of the new road should anticipate possible future footpath min 1800mm wide
- Upgrades to south side of Devon St should be shown including new footpath, minimum width of 1800mm, street trees and landscape verge for the full extent of the street frontage, and bicycle path requirements
- A statement should be provided confirming landscape treatment, including tall canopy trees, can be achieved within the 5m services easement
- The bicycle path in the new road easement should connect to the foreshore 3m path within riparian zone and the cycle path at Devon Street
- The new road design should consider the option for additional street trees in the parking spaces using WSUD technologies
- New stormwater and services to be designed so as not to inhibit planting of street trees, in the verge and or car parking spaces;
- At the riparian zone/edge boundary, the retaining wall should be stepped with landscape to reduce visually vertical scale of wall and the 1800 high fence at the top of the wall.

TRANSPORT PLANNING

The submitted Traffic Report refers to a 3.0m shared path on the access road however the landscape plan refers to 2.5m. This path is to be confirmed at 3.0m.

It is requested that a shared path of width 3.0m be provided on the southern side of Devon St at a minimum between the access road and Colquhoun St. It is also noted that Council's minimum footpath width is 1.5m.

A connection from the access road to the foreshore path should be provided. See diagram below.



Yellow arrow shows preferable connection between the road and the foreshore

Foreshore paths need to be able to accommodate a 3.0m wide bike path and a 2.0m wide footpath (footpath preferably on the river side) – not just for maintenance, but ongoing permanent public access. The challenge with providing a 2.5m gravel path within planted vegetation is that the proposed works such as re-grading/contouring/planting can prevent paths from being constructed in the future, or render them prohibitively expensive. At a minimum, if the applicant is not providing separated paths, they need to provide a 3m wide concrete path, and demonstrate through their DWGs how a future 2.0m wide pedestrian path can be constructed by Council in the future with respect to both topography and vegetation.

BIODIVERSITY & HABITAT

Lighting is to be designed to minimise the potential for overspill into the adjoining Duck River riparian corridor (*AS 4282:2019 Control the obtrusive effects of outdoor lighting*). A suitable condition requiring this could be imposed on any consent granted.

LANDSCAPE AND TREE PROTECTION

Street trees along Devon Street

- There is a comment on drawing SSD-03 Rev K dated 26.11.2020 which mentions *the existing street trees may need to be removed at a future point and replaced with new street trees*. This is not supported and every effort should be sort to amend future designs and services to enable the retention of the high to medium value mature trees.
- It was previously recommended that the applicant appoint a Consulting Arborist to provide advice and guidance and protection measures for these street trees. This point still applies for any future design works and should be factored in at this stage. In this regard, council recommends the following:

The engagement of a AQF Level 5 Arborist ('Project Arborist') to provide a Tree Impact Assessment, Tree Protection Plan and Tree Management Specification to incorporate specific tree protection measures to the street trees located along Devon Street, in accordance with AS4970-2009 (Protection of Trees on Development Sites) and a Tree Removal Plan for any trees proposed to be removed.

TRAFFIC MATTERS

In regard to the access to Duck River, the applicant has revised their proposal to now have the New Public Road extend further south and closer to Duck River as shown below.



The new road will have a carriageway width of 12m as per the initial Civil Plans submitted with the application. The cross section appears satisfactory and should be able to cater for the design traffic, however swept paths have not been shown. These details can be investigated further when detailed civil plans are provided to Council post approval.

Driveway

The applicant claims that a 27.1m driveway is required to cater for the swept paths of a 26m long B-Double. This is not supported. This driveway width would only be necessary if it was required for trucks to not cross the centre of the driveway. Considering that as per the supplied documentation, there will be approximately 1 heavy vehicle movement every 6 minutes in the worst case weekday, it is considered acceptable for the swept path of a truck to use the entire physical width of the driveway and cross the centre. It should be noted that the design of the internal truck parking bays should not be impacting the public domain area.

In addition to this, in order to address concerns regarding pedestrian safety, the proposal now includes a pedestrian refuge island in the middle of the driveway. This approach is not supported as this gives the indication that vehicles have priority over pedestrians.

Accordingly, Council's position on this matter is unchanged and the width of the driveway will need to be revised.

Recommended traffic related conditions are as follows:

Prior to the issue of a Construction Certificate

Prior to the issue of a Construction Certificate, detailed engineering plans of the proposed road are to be submitted to Council's Traffic and Transport Manager for consideration by the Parramatta Traffic Committee and approval by Council. The construction of the proposed road is to be carried out by the applicant with all associated costs to be paid for by the applicant at no cost to Council.

Reason: To ensure maintenance of traffic flow and safety in the road network.

The width of the vehicular crossing is to be reduced to not be beyond what is required to allow for the safe access to and from the site of a 26m B-Double. Details of the revised vehicular crossing including plans shown the swept paths of the design vehicle, are to be submitted to Council's Traffic and Transport Manager for approval prior to the issue of a Construction Certificate.

Reason: To ensure pedestrian safety.

During Construction or Works:

Oversize vehicles using local roads require Council's approval. The applicant is to be required to submit an application for an Oversize Vehicle Access Permit through Council's Traffic and Transport Services, prior to driving through local roads within the City of Parramatta LGA.

Reason: To ensure maintenance of Council's assets.

STORMWATER AND CATCHMENT MANAGEMENT – GENERAL
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The proponent has not sufficiently responded to the previously raised catchment comments. There is no design of overland flow paths, bioswales, WSUD landscape elements, or even the terrain itself. The proponent has relied on numerous Tuflow –generated coloured maps, but it is not clear how this relates to the final developed landform and the real flow paths associated with that as no landform design has been done. Council's previous concerns regarding this matter remain unresolved.

CIVIL INFRASTRUCTURE

CIVIL INFRASTRUCTURE – STORMWATER

Comment on response provided under 1.2.1 (low and High Volume Stormwater and Overland Flows) and 1.2.2 (Management of Flood Flows)

A. Overland Flooding

- i. Overland flow depths, levels and hazard for the existing case have been included but only changes have been reported for the proposed design case.
- ii. To understand how overland flow in the design case has been managed, overland flow depths, levels and hazard for proposed design case should be mapped and included in the report. This should demonstrate that overland flows are safely conveyed to the discharge location.

- DA35 shows that the proposed earthworks will be a flat (0%) grade in the west-east cross section. If this the case, then how will overland flows be managed?
- iii. It is understood that mainstream flow and overland flows are modelled separately and reasons have been provided. However, it is not clear how cumulative impact has been assessed. Further, details regarding incorporation of mainstream flow boundary conditions in overland flow model should be provided.
 - iv. Manning's roughness coefficient map for the existing condition has been included however it is not available for the proposed design.

B. Mainstream Flooding

- i. Limited information is available about the incorporation of the proposed design in the model. For example, how have flows from the proposed site in both the existing and design scenario been incorporated in the model? Details of inputs for the model should be provided. Further, flows discharging from the site in both pre and post development should be included in the report. Flow management for increased flow should also be included.
- ii. Total Flood storage (combined mainstream flood volume and overland flood volume) within the subject land in both existing case and proposed case should be tabulated and confirmation of adequacy of flood compensation volume provide should be included in the report. A summary table along with stage-volume should be provided.
- iii. FFL for proposed pad (Stage 1, southern part) is shown to be 3.80 m AHD in DA31, issue D. 1% AEP level at Duck River at that location is also 3.80 m AHD. FFL should be 1% AEP plus 500mm free board.

C. Existing System

City of Parramatta Council's database shows that 900mm diameter pipe exists south of Unwin St up to Duck River through the site. DA15 shows that a part of this pipe has been proposed to be realigned and discharge via a headwall. It is not clear that how that flow has been managed from this point to Duck River (ie. via open channel or pipe system). Details should be provided with investigation for adequacy.

D. Lot OSD

It has been anticipated that lot detention will worsen peak flow by delaying discharge to Duck River and hence no OSD has been provided. As per City of Parramatta City Council guidelines this should be demonstrated by investigation/modelling/analysis.

Comment on response provided under 1.2.3 (Flooding in Events Greater than the 0.2% AEP)

As the inundation level is higher in the PMF compared with the existing situation, the impact on neighbouring properties should be assessed. As advised previously, filling the floodplain may have cumulative impacts on flooding in events greater than 0.2% and hence not supported in general.

Comment on response provided under 1.2.4 (Management of Flooding for individual Lots)

Refer comments above.

Comment on response provided under 1.2.5 (Evacuation and a Flood Emergency Response Plan)

It is mentioned in the report that an Evacuation and a Flood Emergency Response Plan is to be prepared and submitted prior to the commencement of operation. However, given the flooding conditions and hazards, this plan is to be prepared at this stage and updated before operation. The proponent should liaise with the SES in the preparation of this plan.

Comment on response provided under 1.2.6 (H4 and H5 Hazard)

Given that subject land will be under high hazard in PMF, risk management should be included along with evacuation and a flood emergency response plan.

Comment on response provided under 1.2.8 (Climate Change Rainfall Increase)

Climate change needs to be incorporated as per recommended guidelines and the flood planning level is to be set with higher flood level of 1% Flood Level and 1% Flood level with climate change plus 500mm.

CIVIL INFRASTRUCTURE – ROADS

Proposed Easement

The proposed easement through the riparian corridor to Duck River suggests that this road will remain in private ownership otherwise it would become part of the road reserve. This will need to be clarified.

Details of Road

For any new road, the applicant must provide final civil drawings with a Pavement Design Report and Project Quality Plan for Council to endorse.

Specific requirements to be included in the civil package include the following:

Pavement Design Report

For the road network approved by this application that will become Council's asset upon dedication, prior to works commencing, the developer must submit a Pavement Design Report to Council's Service Manager Civil Infrastructure for approval.

The report must include the proposed pavement structure, discussion of each element of the pavement design system shown in Figure 2.1 of Austroads' Pavement Design Guide (project reliability, construction and maintenance considerations, environment, subgrade evaluation, pavement materials and design traffic), all background data (e.g. traffic surveys and studies,

geotechnical investigation, field and laboratory testing etc.), assumptions and calculations in the design process and nominated construction specifications.

For road pavements the design standards are:

- Specification 0042 (published by NATSPEC); and
- Austroads' Guide to Pavement Technology Part 2: Pavement Structural Design

Project Quality Plan

For the road network approved by this application that will become Council's asset upon dedication, prior to works commencing, the developer must submit a Project Quality Plan to Council's Service Manager Civil Infrastructure for approval.

The Project Quality Plan must be based on construction specifications and quality systems. It must include work method statements for typical work activities, description how the specifications and quality system will be applied, which testing is required, which records will be prepared and submitted to Council at various stages of construction. It must identify all inspections by Council's officer, hold and witness points during the construction etc.

For road pavements the construction standards are:

- If design traffic is less than 10^5 ESA – AUS SPEC specifications (published by NATSPEC)
 - 1141 – Flexible Pavements
 - 1143 – Sprayed bituminous surfacing
 - 1144 – Asphaltic concrete (Roadways)
 - 0161 - Quality (Construction)
 - Other relevant AUS SPEC specifications for the work not covered by above specifications
- If design traffic is equal or higher than 10^5 ESA – RMS Specifications
 - 3051 – Granular Base And Subbase Materials For Surfaced Road Pavements
 - R71 – Unbound and modified pavement course
 - R73 – Construction of plant mixed heavily bound pavement course
 - R83 – Concrete pavement base
 - R106 – Sprayed bituminous surfacing (with cutback bitumen)
 - R107 – Sprayed bituminous surfacing (with polymer modified bitumen)
 - R111 – Sprayed bituminous surfacing (with bitumen emulsion)
 - R116 – Heavy duty dense graded asphalt
 - Q6 – Quality Management System (Type 6)
 - Other relevant RMS specifications for material and roadworks not covered by above specifications

The above is required to ensure that new road pavements are designed in accordance with current standards, to ensure high quality of construction and to ensure long term performance of road pavements and other infrastructure assets.

In essence, a condition will need to be imposed that requires the details of the proposed road (including carriageway and public domain) to be submitted to and approved by Council. This will ensure that the design details of the road meets the requirements of Council's civil assets, public domain, transport planning and traffic requirements.

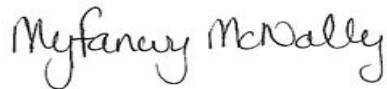
Conclusion

It is noted that this is the recommendation of Council officers and this submission has not been endorsed at a Council meeting.

Council appreciates the opportunity to comment on the above application and looks forward to further consultation on this matter.

Should you wish to discuss the above matters, please contact Kate Lafferty (Executive Planner) on 9806 5535 or at klafferty@cityofparramatta.nsw.gov.au

Yours sincerely



Myfanwy McNally
City Significant Development Manager