



Our reference: ECM 9513209  
Contact: Gavin Cherry  
Telephone: (02) 4732 8125

14 April 2021

Nathan Stringer  
Email: [Nathan.Stringer@planning.nsw.gov.au](mailto:Nathan.Stringer@planning.nsw.gov.au)

Dear Mr Stringer,

**Response to Notice of Exhibition – SSD-8571481 – TAFE NSW Construction Centre of Excellence at 2 – 44 O’Connell Street Kingswood**

I refer to the Department’s request to provide comments in relation to the subject State Significant Development proposal.

Thank you for providing Council with the opportunity to comment. The following comments are provided for the Department’s consideration in relation to the proposal.

**1. Development Engineering Considerations**

The following engineering considerations have been raised for address in the progression of the assessment:-

- A driveway access/hardstand area for maintenance vehicles to access and clean of out the GPT is required.
- The submitted Floodplain Management Report (Clause 5.2) details that the AEP 1% flood level is RL 47.65m AHD. The submitted Civil Engineering Report (Clause 2.6) states it is RL47.00m AHD. Council Records indicate that the 1% AEP level of RL 47.65m AHD is the correct level at this current time. The proposed floor level of RL51.70m AHD complies with Council’s freeboard requirements.
- Although the site is outside the OSD mandatory area, Council requires developments to have the same pre-development vs post-development flow rates at the outlet before the Great Western Highway. This would need to be demonstrated for the 5, 10 and 100 year storm events. The current proposal of the single building and associated hardstand areas however may not increase the flow rates due to the overall size. Based on the future concept plans for the site, this will need to be addressed in the future, and some form of controlling discharge will be required. The applicant should be made aware of this aspect.

**2. Biodiversity Considerations**

No concerns or objections are raised with the proposal on biodiversity grounds however the following matters should be addressed as conditions of consent if the application is favourably determined:-

- Tree protection measures should be included;
- Mitigation measures should include replacement planting at a ratio of 2:1 to compensate for trees for removal, as a bushland restoration effort (separate to the Landscaping requirements of the project) within the patch of vegetation located to the north west of the current site, associated with the existing pond/water source mapped as 4/5, in figure 15 of the EIS, dated March 2021. A VMP would support this undertaking;
- A VMP should be prepared in consideration of the National Recovery Plan for the Grey-headed Flying-fox to contribute to foraging opportunities. In addition, the VMP should address weed management requirements; and
- Pre-clearance surveys of the trees identified for removal. The safe handling and removal of protected fauna for relocation on site, by a licenced wildlife handler.

### **3. Traffic Management and Parking**

The proposal has been considered having regard to traffic management and car parking considerations and the following aspects are identified for further address:-

- The proposal currently does not provide sufficient on-site parking to cater for the proposed development when existing car parking demand rates are applied to the proposal. The submitted traffic report states that 84% of students and staff currently drive to the TAFE campus however in suggesting a reduced parking rate, the report assumes that the percentage of students and staff driving to the site will reduce down to 70% by 2030. There does not appear to be a strong basis for this assumption, noting specifically that there is no station proposed to be constructed at this campus or WSU as part of the Metro works. Further clarification and justification is sought from the applicant on the reasoning and rationale for the suggested parking reduction as there does not appear to be sufficient basis for the parking supply proposed. This justification should be based on projected modelling post Metro construction and any other information or modelling associated with similar facilities that has informed the proposed reduced parking rate as now proposed.
- The traffic report outlines that key intersections surrounding the development will be reduced to a level of service D which indicates that mitigation measures should be investigated for implementation as part of the development.
- The provided swept paths in the traffic report appear to show the service vehicle taking up the majority of the width of the circulation roadways and driveway. This is not appropriate, is unsafe and the driveway and circulation roadways should be widened to accommodate passing of the service vehicle and a passenger vehicle.

### **4. Waste Management**

All developments are required to provide a waste collection room integrated wholly within the built form to permit a safe and efficient waste collection service. The room will need to incorporate infrastructure into its design in accordance

with section 3.4 of the *'Industrial, commercial and mixed-use waste management guideline'* document. At present this has not been included in the development.

The plans should be revised to provide for this integrated infrastructure and address the following sections of Council's Penrith DCP 2014 – Waste Guideline:-

***Integrated On-site Waste Collection***

*Waste collection vehicles proposed to service commercial and industrial developments are to be designed in accordance with the vehicle specifications outlined in section 3.5 of the 'Industrial, commercial and mixed-use waste management guideline' document.*

***On-site Collection (section 2.2.1)***

*The vehicle must be able to safely and efficiently access the site and the nominated collection point to perform on-site waste collection. There must be sufficient manoeuvring area on-site to allow the collection vehicle to enter and exit the site in a forward direction and service the development efficiently with little or no need to reverse.*

***Architectural Plans (section 2.2.2)***

*Scaled architectural plans are required to support the development application which demonstrate the site's entry point, vehicle's route of travel and manoeuvring comply with a standard waste collection vehicle (section 3.5).*

**Note:** *Detailed plans to be submitted outlining the on-site waste collection infrastructure located within the built form.*

Should you wish to discuss any aspect of Council's comments further, please do not hesitate to contact me on (02) 4732 8125.

Yours sincerely



**Gavin Cherry**  
**Development Assessment Coordinator**