

In reply please quote: 17/22684

Contact: Kerren Ven on (02) 9725 0878

3 September 2021

Industry Assessments
NSW Department of Planning, Industry and Environment
GPO Box 39,
SYDNEY NSW 2000

Dear Mr Bertwistle

**SSD-8859 – REQUEST FOR ADVICE TO RESPONSE TO SUBMISSIONS FOR PROPOSED
SUBDIVISION TO 1111-1141 ELIZABETH DRIVE, CECIL PARK**

I refer to Council's previous submission dated 3 November 2020 regarding the above matter. Council officers have reviewed the amended information package and note amendments have been made to the subdivision plan lot sizes and intended future uses to prohibit sensitive developments in light of location of the Jemena Gas pipeline easement along the south east boundary of the site.

Council concerns remain regarding potential economic impacts of future development on the site on retail centres in the Fairfield City. In addition, there are also concerns in regard to the site servicing/access arrangements and traffic safety impacts on the adjoining road network. In this regard, requests that the following matters be considered under further assessment of the proposal.

1. Impacts on existing centres and retail activity

The applicant has amended the intended future uses for the site for the purpose of a highway service centre, short-term accommodation and recreational facilities. Council concerns remain in regards to the potential impacts of intended future uses of the site on existing retail centres.

The Fairfield Local Strategic Planning Statement (LSPS) as well as Fairfield City Centres Study and associated Policy do not support major standalone commercial or retail uses (e.g. including supermarket use) on the site. In addition, the site directly adjoins the Fairfield Rural Lands Urban Investigation Area (UIA), with strategic directions for the surrounding area still be investigated by the UIA Steering Committee (co-chaired by the Greater Sydney Commission).

The draft UIA Structure Plan (Attached) was endorsed by Fairfield City Council which shows the proposed location for a new town centre in Cecil Park that would be the primary location for retail and commercial services for the UIA. Council is also working with TfNSW in regard to the potential provision of a passenger rail station in the centre that would be located on the Parramatta to Western Sydney Airport passenger rail line.

1111-1114 Elizabeth Drive has significant capacity to accommodate a range of commercial uses that are more suited for the proposed Cecil Park town centre, that would be serviced by public transport, have closer proximity to residential development and be supported by a range of complimentary services and facilities for 'main stream' commercial developments.

It is acknowledged that Attachment 4 of the SSD application lists a number of intended uses for the site aligned with service activities and would rely more on passing traffic from the surrounding motorways and State arterial roads as the main customer base for these uses. The economic impact assessment for the proposal also confirms this arrangement and identifies service and recreation uses as being the main viable land use options for the site.

In this respect, Council does raise an objection to the site being established in future as a highway service centre subject to uses permitted under any approval being those discussed in the economic impact assessment.

However, Council does not endorse 'Recreation facility (major)' as listed in Attachment 4 as a suitable use for the site. This is based on the fact that under the NSW Standard LEP definition this category of development includes a number of higher order and more intensive recreation uses as follows:

recreation facility (major) means a building or place used for large-scale sporting or recreation activities that are attended by large numbers of people whether regularly or periodically, and includes theme parks, sports stadiums, showgrounds, racecourses and motor racing tracks.

The potential scale and nature of major recreation uses needs to be supported by public transport and active transport systems that are not (or unlikely to be) available to the site that is surrounding by major roads. Rather, major recreation facilities are more suitable and likely to be established in the proposed Cecil Park town centre that will be supported by public transport and other services.

This use would also be important in supporting place making outcomes for the town centre in future. The following section of this submission relating to traffic issues also highlights the need to avoid the major traffic generating use major recreation facility on the site.

2. Traffic matters

Council's Traffic Engineers have outline a number of matters having regard to issues raised by Transport for NSW (TfNSW) that shall be addressed prior to determination.

- Vehicles turning left from the realigned Wallgrove Road onto the access road would impact motorists' sight distance when exiting the access road. A Safe Intersection Sight Distance (SISD) assessment shall be undertaken for the proposed intersection of the new access road and the realigned Wallgrove Road. The SISD must demonstrate compliance that the road design complies with Austroads requirements for TfNSW and Council to review. This issue shall be also addressed as a result of the findings of the Road Safety Audit.
- Traffic impacts associated during construction and operational phases shall be shall be submitted for further assessment.
- The TIA Report states that during operational phase, traffic generation rates would result in potential 568 peak hour vehicle trips to the potential for 9,490m² gross floor area (GFA) for various uses. Traffic generation estimated for the proposed development shall be based on the RMS Guide to Traffic Generating Developments – 2002 and the RMS Guide to traffic surveys (TDT 2013/04a).

- Additional information is required about how traffic generation is calculated based on the potential various land uses of up to 9,490m² GFA for the proposed development. The traffic generation of 568 vehicle trips per hour (284 trips in and 284 trips out) as it is anticipated to have significant impacts on the adjoining road network.
- Should the proposed access road to and from the subdivision development be dedicated to Council as a public road, any traffic control devices (traffic calming devices, median islands, signs and line markings etc.) to be installed on the road requires approval from the Fairfield Traffic Committee.
- Council has not approved the operation of B-Triple vehicles in the Fairfield Local Government Area as their impacts on local road network are unknown. The use of B-Triple vehicle shall be justified by swept path analysis to indicate that the B-Triple vehicle can satisfactorily travel to and from the site without impacting other road users and whether compliance with the NSW Road Rules can be achieved. Field trial may be required to ascertain whether the proposed access road is suitable to accommodate heavy vehicles.
- The applicant shall provide a Parking Impact Assessment Report to demonstrate that there is sufficient on-site parking to meet the future peak parking demands generated by the subdivision development.
- Traffic modelling assessment results including an electronic copy of the modelling assessment files shall be submitted to TfNSW and Council for assessment. A holistic study including traffic modelling assessment shall be undertaken to determine the impacts of the proposed development on the adjoining state and local road networks. With regard to the traffic modelling assessment, an electronic copy of the SIDRA files (all files associated with the traffic modelling assessment under the existing and forecasted conditions) shall be submitted to the relevant sections of TfNSW and Fairfield City Council for assessment;
- Survey plans indicating dimensions, grades and levels with regard to the proposed realigned Wallgrove Road and access road to and from the development site shall be submitted to Council for assessment. Once the required changes have been confirmed, the provision of access road (future public road) will be reported to Council Services Committee and Traffic Committee for consideration subject to the proposal meet the requirements of TfNSW and the relevant sections of Council.
- The Road Safety Audit has identified all issues related to issues related to the realignment of Wallgrove Road and traffic movements at the signalised intersection of Wallgrove Road and Cecil Road. All issues raised by the accredited Road Safety Auditor (RSA) shall be satisfactorily addressed. All recommendations suggested by the RSA shall be considered for implementation.

- A Traffic Management Plan shall be submitted to Council to demonstrate how the increase in vehicle movements (heavy vehicle and passenger vehicle movements) accessing the proposed access road (travelling to/from the sites) will be managed during the peak AM and PM peak hours during both construction and operational phases.
- The overall site is proposed to be serviced by a variety of commercial vehicles from small, medium and large rigid trucks up to and including semi-trailers/articulated vehicles. The applicant's swept path diagrams in Attachment 3a – Varga Traffic Response to TfNSW need to clarify the width of the access road and defines the boundary is. This helps to determine whether the proposed access road can adequately accommodate heavy vehicles that travel to and from the subdivision sites.

3. Biodiversity Conservation

a. Conservation significance of site

The site has considered to have 'high' conservation significance on Council's conservation significance assessment values map. The proposal shall demonstrate compliance with the requirements set out in Chapter 3 – 3.3 and Appendix F of the Fairfield City Wide DCP 2013 to minimise impact on biodiversity. This includes:

- A revised landscape plan ensuring that species identified as potentially having an impact on adjacent bushland are not included (see NSW WeedWise and Sydneyweeds.org.au), and nursery hybrids of locally occurring native species are not planted.
- Further information on management, monitor and mitigate impacts of light spill on **native fauna** following the national light pollution guidelines for wildlife.
- Retirement of the above mentioned credit report prior to construction.

b. Construction Environmental Management Plan (CEMP)

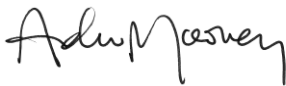
Mitigation and management measures outlined in Part 5.3 of the BDAR Report shall be conditioned within the SSD and included as part of the CEMP for the site.

- Standard CEMP protocols– including site inductions and dust suppression measures.
- Vegetation protection – including protective fencing to prevent impacts to surrounding vegetation, vehicle washing to avoid spread of pathogens/weeds, appropriate locations of stockpiles during construction and installation of sediment fences.
- Weeds – including weed management actions/planning, weed propagule spread control measures and sediment control.
- Fauna habitat – including hygiene protocol implementation, presence of an ecologist during clearing, staged vegetation clearing and protocols for the removal of hollow-bearing trees and other habitat features.
- Water quality and aquatic habitats – including erosion and sediment control measures, plans and surface stabilisation, dust control, spill kits and protocols.

- Ongoing management of priority weeds according to statutory requirements.
- Ongoing water quality management.
- Measures to reduce the increased risk of fire.
- Prescribed fencing requirements as per BDAR
- Ecologically sensitive street lighting design.

It is recommended that the above matters be considered by DPIE in regards to the amended SSD application. Please contact Kerren Ven on (02) 9725 0878 if you require any further clarification regarding the above.

Yours faithfully,



Andrew Mooney
EXECUTIVE STRATEGIC PLANNER