CUMBERLAND
CITY COUNCIL

OA2022/0009

12 December 2022

Americold Logistics Ltd
554-562 Reservoir Road
PROSPECT NSW 2148

Dear Sir/Madam,

Subject:	**Request for Comments - State Significant Development (SSD)**
Application No:	**SSD-9577613**
Property:	**554-562 Reservoir Road Prospect**
Proposal:	**Expansion of the existing Americold refrigerated warehouse facility and additional supporting infrastructure including alterations to the site access, parking and loading arrangements Other Authority Consent - Americold Prospect South Expansion (SSD-9577613) - 554-562 Reservoir Rd Prospect NSW 2148**

Reference is made to the Department of Planning, Industry and Environment referral received on 21 November 2022 inviting Council's comments for the proposed development.

Council has reviewed the submitted information and the following response is provided:

A. <u>Parks/Open Space</u>

No objections are raised by the proposed development; however, the following is noted for consideration:

a) The closest heritage site, the Prospect Hill state heritage registered area is located approximately 500 metres to the west of the development property. The proposal is not expected to have a significant effect on the heritage site due to elevational differences and an intermediate commercial property located between the sites.

b) The southern boundary of the development site is a vegetated riparian corridor that forms the headwaters of Greystanes Creek. The proposed development of the site is an opportunity to undertake creek restoration including weed removal and restoration planting which derive from the conforming ecological community. The perimeter of the site is also established with indigenous plantings and should be similarly enhanced.

c) The verge is degraded along parts of the road frontages that border the development site.

The proposed development of the site is an opportunity to remove redundant fencing, signposts and to reinstate verge plantings and turf on road frontages adjacent to the property, including the reinstatement of missing 'Hoop Pines' at equidistant intervals along the adjacent section of the Prospect Highway median.

B. Environmental Health Unit (EHU)

a) Noise/Acoustics
A noise and Vibration Impact assessment has been prepared by Resonate with referenceS220112RP1 Revision D dated 6 October 2022 – 227401.0048.R01V02. This is considered satisfactory to the EHU. The recommendations in the report will need to be conditioned so that they are implemented.

A construction Noise and Vibration Management plan should also be conditioned as part of the development application so that control measures can be implemented to minimise any potential impacts to sensitive receivers and the surrounding environment.

b) Contamination/Remediation
A preliminary Site investigation report has been prepared by BECA revision B dated 8 July 2022 and this is satisfactory to Council's Environmental Health Unit and no further investigation/ works are required. The recommendations in the report will need to be conditioned so that they are implemented.

c) Air Quality/Water Protection/General Environmental
A waste management plan has been prepared by BECA revision A dated 27 May 2022 which is considered satisfactory to the EHU. The recommendations in the report will need to be conditioned so that they are implemented.

An air quality review was carried out for the development and a report prepared by BECA with Reference 227401.0048.R01V02 Dated 24 October 2022. This is satisfactory to Council's Environmental Health Unit. The recommendations in the report will need to be conditions so that they are implemented.

Sediment and erosion control measures must be implemented as part of the construction phase of the development to control potential impacts to the environment.

Dust mitigation measures should be implemented during the construction phase of the development to reduce any potential environment impacts and impacts to the surround neighbouring properties.

C. Tree Management Section

a) Tree Protection (TPP) and Arboricultural Impact Assessment (AIA)
It is recommended that the applicant obtain an Arboricultural Impact Assessment and Tree Protection Plan to ensure that all vegetation proposed to be retained throughout the development phase of the project are protected as per AS490 - 2009 'Protection of Trees on Development'.

b) Pruning works
During construction or any time during the development, any pruning works should be carried out to AS4373 - 2007 Pruning of amenity trees.

c) Landscape plan and associated works
The landscape plan for the site should be prepared by a minimum AQF5 landscape architect and all hard and soft landscape works carried out by minimum AQF3 qualified landscapers.

D. Development Engineering Section

Stormwater management - On-Site Detention (OSD)

a) The On-site detention (OSD) system must be designed based on the Upper Parramatta River Catchment Trust's (UPRCT) design guidelines which requires the site OSD storage requirement of 470m³/ha and limit the permissible site discharge (PSD) of 80l/s/ha. There is no indication that the required OSD parameters have been incorporated into the development and the OSD calculate summary sheet has not been noted.

b) The stormwater drainage plan indicates that the OSD system has not been designed according to the Upper Parramatta River Catchment Trust's (UPRCT) design guidelines. All the runoff must be directed into the High Early discharge (HED) control chamber/pit for efficient functioning of the OSD system. The stormwater plan indicates that the OSD tank does not incorporate the HED chamber. Further, the lack of high early discharge will result in storage being filled earlier than needed and undermine the functionality and efficiency of the OSD system.

c) Based on the submitted plans, the development site area is noted to be over 1.3ha which includes the new trailer parking area, the associated access driveway and the landscape area. Based on this, the OSD storage requirement for the proposed development to control the site runoff/flow in accordance with the UPRCT guidelines would be approx. 625 cubic metres.

d) The levels (grate levels and invert levels) of the surface collection pits the upstream and downstream side invert level of the associated pipes including ground level have not been provided. Nevertheless, the pipes must be installed in the falling gradient towards the OSD system.

e) For clarity and referencing, each of the pits must be numbered appropriately with the associated surface and invert levels shown adjacent to the pit. In addition, each of the drawings must have standard reduction scale shown appropriately on the drawings.

f) All the runoff that is directed into the OSD system must be directed into the HED control chamber/pit. The submitted plans do not demonstrate the requirements.

g) The Top Water Level (TWL)of RL55.53 within the OSD tank as shown on the cross-sectional drawing is no achievable as the top water level is controlled by the spillway level of the Overflow Weir which is lower than nominated TWL. The actual water level cannot rise above this i.e., RL 55.40mAHD. Hence, the volume calculation for the provided OSD storage volume appears to be overestimated.

Stormwater management - Water sensitive urban design (WSUD) measures

h) The submitted stormwater plans do not appear to incorporate the WSUD measures nor demonstrate how the pollutants removal targets, objectives and control as outlined in section 2.5 and 2.7 Part G4 of Cumberland DCP 2021 are met. The stormwater drainage plan shall be amended to incorporate the water sensitive urban design (WSUD) measure in accordance with the Section 2.5 (Water Quality objective and control) under Part G4 of Cumberland DCP 2021including water quality improvement and water reuse measures. In this regard, the following matters shall be addressed:

i.) Detail drawings demonstrating the Water sensitive Urban design measures (Water quality treatment/ improvement measures) consistent with the council's policy shall be provided.

ii.) The surface runoff from the impervious area such as the roof, car parking area, driveway and roads shall be directed to the water quality treatment systems. In this regard, appropriate measures to collect and treat the runoff to remove pollutants shall be implemented. The printout of the MUSIC Model layout noted in the submitted documents. However, drawings/plans showing the incorporation of the layout and details of the water quality treatment systems have not been noted/provided.

iii.) The layout/printout of the MUSIC model showing each type of the land-use components do not show catchment area for each of the land-use area that generate the runoff.

iv.) It is noted that the runoff from the proposed development (all land-use including car parks areas and roof) is directed to OSD system prior to being treated for water quality improvement purposed. However, this will result in the initial runoff containing high concentration of pollutants being mixed up with subsequent runoff that are generally have diluted concentration pollutants or fairly minimal concentration which may not require treatment. Thus, the treatment system does appear to have maximised its efficiency. Any overflow from the treatment system will result in the pollutants being escaped with the overflow without being treated, thus undermining the efficiency of the treatment system unless specific provisions are made to eliminate the overflows from the treatment devices.

To prevent this, appropriate arrangement must be made to collect and separate the first flush, i.e., the initial flow that contains high concentration of pollutants such as the initial flow equivalent to approximately 1 in 3 month's flow from each catchment, to be collected (separated) and treated fully without being escaped untreated. In this regard, a device known as high flow bypass chamber (also termed as high flow diversion chamber) must be employed to separate the initial flow (first flush) which is allowed to pass through a low level flow outlet into the water quality treatment / filtration system. The flow exceeding that rate shall be discharged through the high level overflow or outlet pipe into the OSD system. The following shall be taken into account:

- The flow must be controlled by appropriate mechanism such as orifice/ opening to allow the first flush flow through the lower outlet (the flow exceeding that equivalent flow must be directed into to the OSD system).

- Appropriate number of devices or capacity must be provided sufficient treatment rate equivalent to the flow rate of the separated flow containing concentrated pollutants, or the treatment system must have sufficient holding capacity to retain the separated first flush until it is passed through the treatment system and ensure that no flow escapes or bypass the treatment system.

- The required provision must be shown on the drawing. In this regard, cross sectional details of the treatment system with the respective levels of other components must be prepared to ensure that the HGL from the treatment

system is consistent and at a higher level, and that there is no backflow into the treatment system.

- If the outflow from the treatment system, is not connected back into the OSD system then, the site permissible discharge rate must be reduced by the flow equivalent to the outflow from the treatment system, and the orifice size be adjusted accordingly.

i. The pollution removal targets must be demonstrated with the supporting documents including the MUSIC mode (electronic copy), with the input parameters and output results. Further, the removal efficiency parameters input in the model must be consistent with the manufacturer's pollutant removal efficiency.

j. Electronic copy of the MUSIC models must be submitted accompanying the input and output parameters/ results.

The submitted plan does not provide sufficient information in detail and demonstrate compliance with the council's requirements. In this regard, the proposed stormwater plan cannot be considered sufficient and acceptable.

Traffic and parking

As per the submitted Traffic Impact Assessment report, the parking provision made appears to satisfy the requirement. However, the following comments are made:

v.) Each of the parking spaces must be appropriately numbered and dimensioned.

vi.) The existing 21 visitor's car spaces that is proposed to be deleted must be made available from the new car parking area/provision and clearly marked and signposted.

E. Planning

There are no building height controls for the subject site under Cumberland LEP 2021. Further, Pursuant to Clause 2.10 of the Planning Systems SEPP, the Cumberland Development Control Plan (Cumberland DCP) does not apply to the proposed development. Notwithstanding, a general commentary is provided on the proposed development as below:

Cumberland DCP 2021

- *Part D Development in Industrial zones*
- *Part F3- Industrial Site Specific*

Given the proposed building (south cold storage expansion) proposes a significant height as compared to the existing building, the structure shall incorporate articulation in building facades and variety in building materials and finishes to minimise the overall visual impact of the proposed structures as viewed from the street and be sympathetic to the existing heritage site - the Prospect Hill State Heritage Registered area.

The overall design shall be compatible with the existing built form and streetscape in terms of façade treatment, building materials and finishes.

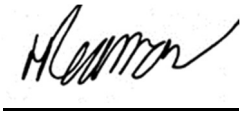
The proposed development shall comply with all the relevant development standards and provisions/guidelines applicable at the time of development application lodgement.

F. Cumberland Local Infrastructure Contributions Plan 2020

The development would require the payment of contributions in accordance with Cumberland Local Infrastructure Contributions Plan 2020. Given no Appendix B (QS report) provided, 7.12 contributions will be applied at 1% of the cost of works.

Should you have any further enquiries please do not hesitate to contact Nighat Aamir on 8757 9972 in relation to this matter.

Yours faithfully,



Harley Pearman
Executive Planner