



File Ref: EXT/2022/0009

13 December 2022

Department of Planning, Industry & Environment  
Locked Bag 5022  
Parramatta  
NSW 2124

Dear Sir/Madam,

**SSD-35962232- Burrows Road Multi-level Warehouse, St Peters**

Thank you for providing Council with the opportunity to comment on the development proposal for a multi-level warehouse at 1-3 Burrows Road, Alexandria.

Council has reviewed the submitted information and in summary whilst it is considered that the redevelopment of the site would be a positive addition to the industrial precinct, the proposal fails to adequately address the adverse flooding and traffic impacts associated with the development. Having regard to this Council does not support the proposal in its current form and these adverse impacts are outlined in further detail below;

Streetscape Presentation

It is acknowledged that Canal Road is a secondary frontage for the subject site and is a street that is comprised of mixed industrial uses. Notwithstanding this, it is noted that the proposal seeks to locate the one of the multistorey vehicular access ramps fronting Canal Road. It also acknowledged that the proposal seeks to provide a landscape buffer along this frontage to screen the site and also retain existing trees. To minimise the impact of the appearance of this vehicular access ramp, it is requested that appropriate planting with sufficient height screen this ramp to ensure an adequate interface to Canal Road is provided.

Traffic/Pedestrian Safety

The Transport Management and Accessibility Plan by Anson Group is unacceptable as it fails to consider the approved State Significant Developments (SSD) at the Boral concrete batching plant at St Peters.

The intersection assessments undertaken in the Transport Management and Accessibility Plan will need to be recalibrated to take into the increases in Traffic resulting from the upgrade of the Boral concrete batch plant. A link to MOD 11 and MOD 12 approvals is provided below:

[Mod 11 - Upgrade and Expansion of CBP | Planning Portal - Department of Planning and Environment \(nsw.gov.au\)](#)

[Boral St Peters Terminal DA 14/96 Mod 12 | Planning Portal - Department of Planning and Environment \(nsw.gov.au\)](#)

# INNER WEST

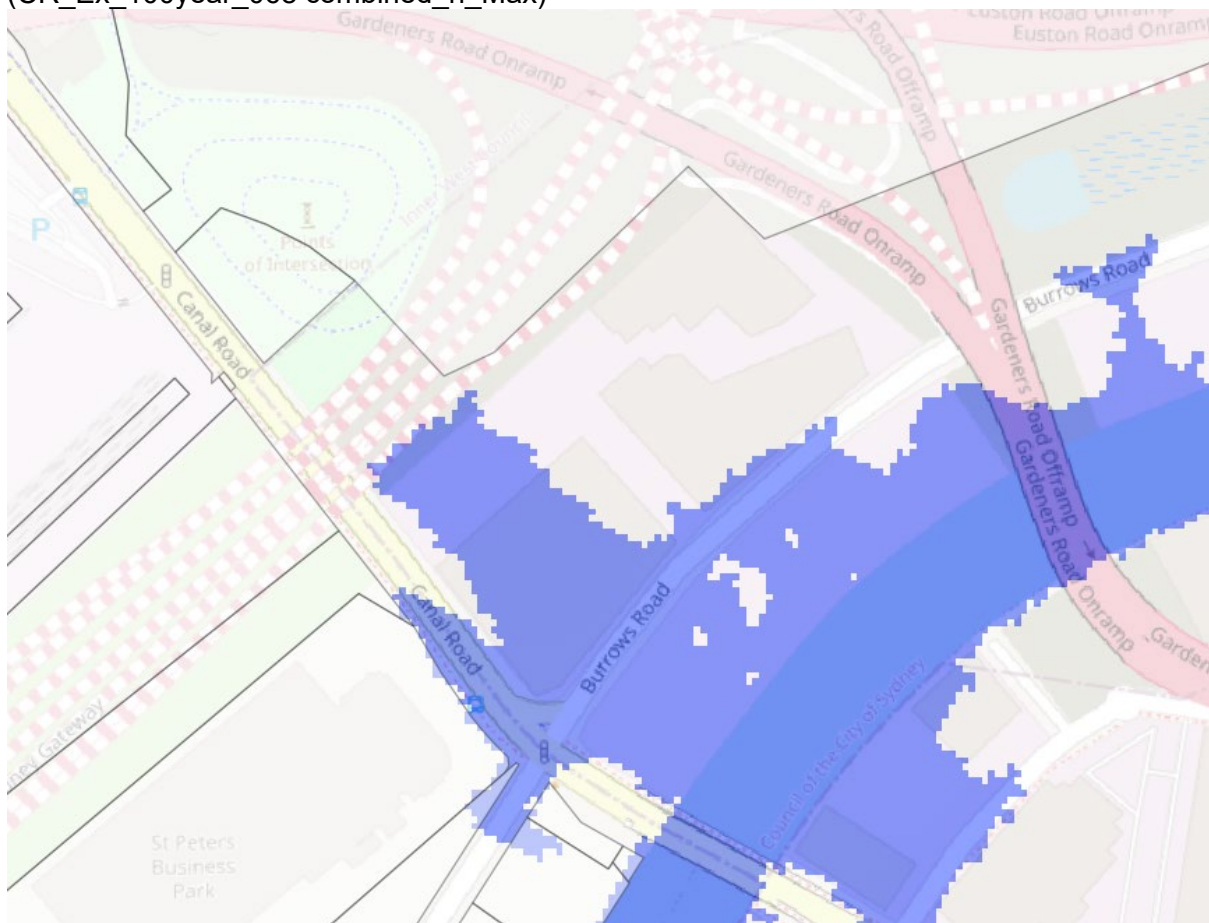
The SEE for the MOD 12 approval found that the Level of Service (LOS) for the intersection of Burrows Road/Burrows Road South/ Ricketty St/Canal Road was an **F** in the afternoon peak (Table 6.4) and the LOS at the intersection of Canal and the Princes Highway will also an **F** in the morning Peak. This is in contrast to the LOS of B and D found by the Anson Group for these intersections (Table 17). The discrepancies in the two traffic assessments must be explained.

## Flooding

Council does not agree with the the conclusion in Section 7 (Flooding and Overland flow) of the Civil Engineering Report by Costin ROE where it states that with reference to Figures 7.4 & 7.5, that the significant flooding shown on these maps (greater than 1m within the property) is a function of the modelling. In addition, Council strongly disagrees with the overall conclusion in Section 7.5 that the site is not subject to flooding and as such no detailed modelling or flood impact assessment is necessary.

The relevant Inner West Council flood studies show that this site does flood in a 1 in 100year flood event and during a PMF flood.

Below in a excerpt from the Cook River FRMP (WMA) detailing the 1 in 100 year flood (CR\_Ex\_100year\_068 combined\_h\_Max)



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This model establishes the 1 in 100 year flood level as being 2.62m AHD with a Flood Planning Level 3.29m AHD. The Flood Planning level includes 500mm freeboard and an allowance for 0.4m of Sea level rise by 2050. The PMF level is 4.24m AHD.

In addition, the Inner West Council Alexandra Canal Flood Study (WMA 2017) also finds that the site is affected by the 1 in 100 year flood as detailed below (MAC\_D\_100y\_060min\_DS20y\_017\_h\_Max)



The model establishes the 1 in 100 year flood level at the rear of the site (along Canal Road) to be 3.03m AHD with the maximum flood level along Burrows Road being 2.74m AHD. 500mm freeboard would be required to establish flood levels.

Based on the above it is noted that the carpark level is below the 1 in 100 year flood level and the Flood Planning levels established by the above studies.

It is recommended that Pre and Post development 2D flood modelling be provided to confirm that there are no adverse impacts or loss of flood storage resulting from the development for a range of storm events. In addition, it must be established that the intersection of Burrows Road/Burrows Road South/Ricketty St/Canal Road is not further adversely impacted by additional flooding during major and minor storms events including the 1 on 2 year storm event.

A FRMR must be prepared for the site and detail how the development (floor levels) will be protected from flooding and how the flood risk will be managed. In addition, a flood evacuation and response plan must be provided taking in to account the PMF.



## **Conclusion**

As outlined above, whilst Council raises no objection to the uplift and revitalisation and utilisation of an undeveloped industrial site, this must be done in a manner which does not adversely impact surrounding development, however the subject proposal fails to demonstrate this having regard to the traffic and flooding impacts.

It is also considered that the documents submitted misrepresent the proposal and do not accurately provide a comprehensive representation of the full impacts of the proposal. As a result, it is considered that further information be requested addressing the identified matters before determining any application for this site.

We would invite the applicant and the DPIE Team to meet with Council to discuss this proposal and future proposals that may be considered.

If you need any further assistance in relation to the above matters, please contact me on 9392 5707 or email [rachel.josey@innerwest.nsw.gov.au](mailto:rachel.josey@innerwest.nsw.gov.au)

Yours faithfully

A handwritten signature in black ink, appearing to read "R Josey".

Rachel Josey  
**Senior Manager - Planning**