

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

Your Ref	SSC-55522478
Our Ref	NCA/6/2023
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3 October 2023

ATTN: Tom Bertwistle

COUNCIL SUBMISSION

NOTICE OF EXHIBITION OF ENVIRONMENTAL IMPACT STATEMENT FOR THE GRAND AVENUE MULTI-LEVEL WAREHOUSE ROSEHILL (6 GRAND AVE, ROSEHILL)

I refer to the above application and the request to provide advice on the proponent's Environmental Impact Statement. Council has reviewed the supplied report and wish to make the following comments:

Urban Design

The following recommendations should be accommodated within the building's design:

Building Height

The development is considered too visually dominant, primarily from Rosehill Racecourse (which is a prominent tourist destination in the City of Parramatta) and any future residential zones north of this site on Grand Ave. The design should be amended to explore reducing the overall height and increasing landscape buffering and building articulation.

The approved building at 8 Grand Avenue (approved under DA/751/2019/C) is not considered to be a precedent as it does not have a prominent and active street frontage impacting the public domain and the building has a smaller side elevation.

This development's floor to ceiling heights, which range from 10.8-13.7m are excessive for the function of an industrial warehouse. The mezzanine, currently functioning as a vehicular carpark could have a reduced height of 3m to accommodate the office and vehicles. The levels with hardstand areas for HRVs should only require a 4.5m minimum clearance to manoeuvre.

In addition, the side elevations for this development are long and unarticulated. With a side elevation of 132m this building should be further articulated, with changes to both building design and colours/materials.

The Camellia Rosehill Place Strategy recommends that, *"New developments will integrate with the public domain, with generous landscaping including green roofs to provide further*

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buffers to heavy industry, providing amenity for new businesses and visitors.” (p71). As such, the design should explore green infrastructure such as green roofs and planters to the outdoor areas or walls.

Additionally, a larger landscape buffer to the Eastern and Western boundary of 3m should be explored to screen the development and ensure the development can be integrated into the vision of the Place Strategy which has streets running either side of the site.

Signage

The signage on the western and eastern facades is considered unnecessary and not visible for users of the warehouse or the street. As such it functions more as advertising than business identification signage. These should be removed, particularly the western signs as they would be highly visible from the Rosehill Racecourse and make the development more visually intrusive from that viewpoint.

Vehicle Entrances

The proposal includes 7 ‘lanes’ of vehicular crossovers, which is considered to be excessive. To reduce the amount of vehicle crossovers the outdoor carparking to the eastern part of the site should be moved internally and co-located with the other vehicular car spaces. This will reduce the number of vehicle entrances from Grand Avenue so that the front setback can accommodate more soft landscaping and be safer for pedestrian and cycle movement along Grand Avenue. The Fire brigade access could still be retained but this access point would then only be used in emergency situations.

Given the number of driveways the site and layout should ensure that entrances and activities are easily identifiable by prospective users.

The carpark ramp running along the front façade visually dominates the front façade. This elevation should not be taken up by vehicular movement as it is facing a future highly pedestrianised street (Grand Ave) and opposite a possible mixed-use residential area which will be highly activated. Otherwise, it is recommended that the currently proposed metal screen have angled fins to further conceal the vehicular movement.

CPTED

The building design should consider CPTED and safety issues by providing opportunities for casual surveillance of the streetscape, public domain and carparking areas. The building should provide some windows, lighting or secondary access door to address the carpark to ensure safety for users.

Public Domain

The development should include a Public Domain Alignment Drawing package including co-ordinated civil and landscape architectural drawings resolving all levels and showing proposed indicative public domain treatments in accordance with the requirements outlined in the Parramatta Public Domain Guidelines (Chapter 2). The proposal should provide an upgraded and widened footpath (without damaging the existing street trees). The public domain drawings should also demonstrate that street trees are provided every 8-10m.

Environmental Health

Contamination

It is recognised that the site has significant contamination concerns, predominately the presence of friable asbestos. The proposed approach to managing this as outlined in the Remediation Action Plan (RAP) and Long-Term Environmental Management Plan (LTEMP) is considered appropriate.

It is recommended that an NSW EPA accredited Site Auditor is engaged by the applicant to review the draft RAP and LTEMP prior to their finalisation and to provide a Site Audit Statement indicating that the site can be rendered suitable for the proposed use subject to completion of the RAP, validation and LTEMP.

A condition requiring a covenant on the title making reference to the LTEMP should be imposed on any development consent to ensure that any future land-owners are made aware of the LTEMP and any management requirements in perpetuity.

Acoustic

It is noted that the proposal seeks approval for usage of the site on a 24 hour/7 days a week basis, this may present issues to sensitive receivers located across the Parramatta River in the Rydalmere/Ermington area as 24 hour usage in this area has elicited noise complaints previously.

It is expected that the individual tenants will submit acoustic assessments with any further development applications for usage of the tenancies and further detailed assessment of any potential noise impacts could be carried out at this stage.

Waste

The submitted Waste Management Plan (WMP) is satisfactory regarding the proposed management of demolition and construction waste. Further detail, in business specific WMPs, will need to be reviewed at tenant DA fitout stage.

Construction Environmental Management Plan (CEMP)

A CEMP should be developed for this proposal given its size and scope. This Plan should include sub-plans that provide further detail on the various environmental aspects i.e. waste, noise, air quality, contamination management, hazardous materials etc anticipated during the demolition and construction stages. This would also need to include a community engagement and complaint response plan with detail on any community notification required and complaint contact information (email, phone number).

Trees and Landscaping

The recommendations within the Arboricultural Impact Assessment and tree protection plan should form explicit part of any approval. Appropriate conditions should also be imposed to ensure that the landscape package is implemented and certification provided from a qualified landscape architect.

Traffic and Transport

Parking

The Parramatta DCP 2011 requires 1 space per 70m² of industrial GFA and 1 space per 50m² of office GFA. Accordingly, the development is required to provide 599 parking spaces.

The development proposes 209 parking spaces including 6 accessible parking spaces meaning that it has a shortfall of 390 parking spaces. The Traffic report justifies this shortfall

with reference to the Camelia Rosehill Place Strategy (the Arcadis Report). This on its own is not sufficient to justify the shortfall.

The application is required to provide further information to justify this. This is to include providing further clarification how the total forecasted population of 450 was derived.

Furthermore, clarification is required as to whether this number is to be divided across 2 shifts as stated in the report (12 hours each shift) or 3 shifts and what the overlap will be between staff arriving and staff finishing.

The Traffic report should then use this information as well as the existing mode share to determine if the proposed parking rate will be sufficient.

Bicycle Parking

The Parramatta DCP 2011 requires 1 space per 200m² GFA for industrial, retail, businesses and office developments. Accordingly, the development is required to provide 206 bike parking spaces as per the DCP. The submitted Traffic report considers this rate to be excessive for the proposed development as it assumes there to be a maximum of 225 staff on the premises at any one time. The report also refers to the Planning Guidelines for Walking and Cycling dated December 2004 and proposed only 19 bicycle spaces.

It is acknowledged that the rate stated within the Parramatta DCP 2011 is excessive for the proposed development as this rate does not differentiate between office and industrial developments. As such, consideration is given to the newly created Parramatta DCP which requires 1 space for every 1,000m² for industrial developments and therefore, would require 41 bicycle storage spaces. It is considered that the provision for 41 bicycle parking spaces to be more appropriate than 19 spaces given the long-term goals of having a mode shift towards more active transport options and the fact that the use of each warehouse is not specified meaning staff occupation numbers can be varied.

Green Travel Plan

A Travel Plan is a package of measures designed to reduce car trips and encourage the use of sustainable transport. As per section 4.3.1 (Camellia and Rydalmere) of the Parramatta DCP 2011 a Green Travel Plan is required as the development contains 5000sqm of gross floor space or 50 or more employees. As such a Green Travel Plan should be provided, particularly in circumstances where a variation to parking rates is proposed.

Alternatively, where a Travel Plan is required as a condition of development, it should be a requirement that it be submitted for approval to the Consent Authority prior to the release of the Occupation Certificate. If the future occupant(s) are known, then the Travel Plan must be prepared in co-operation with them. Implementation of the recommendations in the Green Travel Plan should be a 'use' condition of consent applicable for the life of the development.

Flood Engineering

Council staff are supportive of the proposed flood planning and stormwater design provided that the engineering conditions in [attachment 1](#) of this letter are applied to any development consent.

Development Contributions

Council development contributions are required to be conditioned as per City of Parramatta (Outside Parramatta) CBD Contributions Plan 2021 – Amendment 1. Council has calculated the contribution amount as \$1,109,465.37.

Conclusion

Council appreciates the opportunity to comment on the subject application.

It is noted that this letter contains the recommendations of Council officers.

Council is supportive of continued investment in the City of Parramatta and look forward to continued collaboration.

Should you wish to discuss the above matters, please contact Paul Sartor on the details listed above.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Alex McDougall', written in a cursive style.

Alex McDougall

A/ Manager, City Significant Development

Attachment 1 – Recommended Engineering conditions

1. **Stormwater Water Treatment**

Stormwater treatment shall be installed to achieve the requirements of section 3.3.6.1 of the Parramatta Development Control Plan 2011, in accordance with the approved stormwater drainage plan and in accordance with the manufacturer's specifications/instructions to manage the quality of stormwater discharged from the site.

Details of the proposed devices, their location and manufacturer's certification must accompany the application for a Construction Certificate to the satisfaction of the Principal Certifier.

In this regard the following must be accommodated:

- a. 400x690 stormwater filter and other WSUD elements must be installed to manage surface runoff water quality.
- b. The number and type of proposed water quality devices and stormfilter cartridges are not to be reduced, nor replaced with an alternate manufacturer's product.
- c. Stormwater treatment measures for the proposed development shall be designed in accordance with the requirements of the device's manufacturer design guidelines. Details are to be included with the plans and specifications accompanying any Construction Certificate.
- d. A maintenance schedule must be provided for the stormwater treatment measures, including the rainwater tank, in accordance with the requirements of the manufacturer. The designer of the stormwater treatment measures must prepare the Maintenance Schedule and this schedule must show the designer's name, signature and date.

Reason: To ensure appropriate water quality treatment measures are in place.

2. **Construction Environmental Management Plan**

A Construction Environmental Management Plan (CEMP) shall be submitted to and approved by Council prior to work commencing.

The CEMP must be prepared in accordance with ISO14001:2015 and the Department of Infrastructure, Planning and Natural Resources (2004) 'Guidelines for the Preparation of Environmental Management Plans' and submitted to the relevant authorities at least 4 weeks prior to the commencement of construction.

This plan must cover demolition, soil and water management and site maintenance and any associated groundwater, flooding and overland stormwater flow management. It must address any possible pollution risks, and how they will be managed. It must incorporate updated erosion and sediment control plans/ stormwater plan showing how rainwater and groundwater captured within the site will be treated to satisfactory water quality standards, monitored, and discharged. The plan and management system must be implemented throughout the work.

Reason: For environmental protection.

3. **Civil works within council land, roads, and drainage network**

Any works within Council land, road and drainage network will require the following details and will need to comply with:

- Heavy-duty vehicular crossings shall be constructed in accordance with Council's Standard Drawing numbers DS9 and DS10. Details must accompany

an application for a Construction Certificate to the satisfaction of the Certifying Authority. A Vehicle Crossing application must be submitted to Council together with the appropriate fee as outlined in Council's adopted Fees and Charges prior to any work commencing.

- The grades of the driveway, including transitions, must comply with Australian Standard 2890.1 to prevent the underside of the vehicles scraping. Where the geometric change in grade exceeds 18%, the gradients of the driveway and ramps shall be checked using the method at Appendix C in AS2890.1:2004 and adjustments will be made to accommodate suitable transition lengths. Details are to be provided with the application for a Construction Certificate.
- A road-opening permit must be applied for where a new pipeline is proposed to be constructed within or across Council owned land. Additional road opening permits and fees may be necessary where connections to public utilities are required (e.g., telephone, electricity, sewer, water or gas).
- Details of any reinforced concrete pipework within Council land shall be submitted to Council for approval prior to the commencement of any work.

Reason: To provide suitable infrastructure without disruption.

4. *WSUD Positive Covenant/Restriction*

Prior to the issue of an Occupation Certificate a Positive Covenant and Restriction on the Use of Land under Section 88E of the Conveyancing Act 1919 must be created, burdening the owner with the requirement to maintain the WSUD facility on the lot.

A WAE survey shall be conducted, and plans prepared showing the 'as built' of the complete water-sensitive urban design systems with the S88E instrument. The terms of the 88E Instruments are to be generally in accordance with Council's "standard terms" available in Council's website, under Development Forms.

Where a title exists, the Positive Covenant and Restriction on the Use of Land is to be created via an application to the Land Titles Office using forms 13PC and 13RPA. Accompanying this form is the requirement for a plan to scale showing the relative location of the WSUD facility, including its relationship to the building footprint.

Registered title documents showing the covenants and restrictions must be submitted to and approved by the Principal Certifying Authority prior to Occupation or use of on-site.

It is required that a certificate from the cartridge manufacturer be submitted to the Council with the Positive Covenant and Restriction on the Use of Land under Section 88E application to ensure that the design and construction of the stormwater treatment devices are in accordance with the manufacturer design specifications. A maintenance schedule for the filtration system shall be attached as an addendum to the Positive Covenant for the WSUD system.

Electronic colour photographs in jpg format of the system shall accompany the application for the Positive Covenant and the Restriction on the Use of the Land. These photos shall include such elements as the, step irons, weir, sump and all pipe entries to the WSUD chamber and confined space warning signs at each entry point, swale, and filtration chamber. The photos must be well labelled and must differentiate between multiple tanks.

Reason: To ensure the WSUD is adequately maintained in perpetuity.

5. *Flood evacuation report*

A flood evacuation report and procedure shall be prepared by an appropriate consulting engineer prior to the issue of the relevant Occupation Certificate and be submitted to the Principal Certifying Authority.

This report is to demonstrate how the occupants of the development will egress the site in the early stages of a storm event, together with how they will seek refuge in a peak stormwater event.

The report must also detail the proposed shelter in place facility. The facility must be large enough to accommodate all the people on site and suitably designed and equipped with services such as drinking water, toilet, and other provisions necessary for a stay by all occupants for up to 72 hours. It will require skylights or windows that will provide light, ventilation and access to the roof.

A copy of the report shall be attached to the Occupation Certificate when forwarded to Council and be available on site at all times by the building's occupants.

Reason: To inform property owners/residents of the procedure in the case of flood.