

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

Your Ref	SSD-53338465
Our Ref	NCA/2/2023
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16 November 2023

ATTN: Thomas Bertwistle

COUNCIL SUBMISSION

NOTICE OF EXHIBITION OF ENVIRONMENTAL IMPACT STATEMENT FOR THE GRAND AVENUE DATA CENTRE EXPANSION, ROSEHILL (8 GRAND AVENUE, 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:

Engineering

A review of the provided stormwater plans has been undertaken and the following additional information is required:

Flooding

1. A report prepared by a suitably qualified civil engineer experienced in flood risk management shall be submitted to demonstrate that the proposal complies with Floodplain Risk Management Policy and specifically address the controls in City of Parramatta DCP.
2. The Flood Evacuation Plan shall include details of the proposed evacuation including horizontal and vertical evacuation, safe access routes, emergency services access to the site during the flood event, staff training and drills, warning system details and required maintenance. If Shelter in Place (SIP) is proposed, the Shelter In Place should be above the PMF and the building must be certified by a structural engineer to demonstrate that the building withstands flood forces up to the PMF. The SIP shall be large enough to accommodate all occupants at any time based on the facility's maximum capacity. Details of the SIP including location, size, access, required equipment and facilities such as emergency kit, first aid kit, toilets, portable radio with batteries, candles and waterproof matches, list of emergency contact details, food, water etc. to be included in the report.

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Water Sensitive Urban Design

1. The submitted information has not incorporated a MUSIC model demonstrating compliance with the Water Management controls listed in section 3 of Councils DCP. In this regard, the proposed stormwater plans shall incorporate WSUD and Stormwater Harvesting measures within the plans and submit to Council a **MUSIC model** and layout to be included in the plan demonstrating compliance with the minimum requirements and targets listed in the DCP. Furthermore, Detailed sections and plan view shall also be provided for the GPT including proposed location (safe location for maintenance purposes) etc.
2. It should be noted that runoff from the catchment at the earlier stage of storm event carries high concentration of pollutants, which is termed as the **"First flush"**. The runoff from the later stage will be less polluted as the dilution takes effect. It is not necessary to treat the runoff from the whole duration of the storm event. Generally, the earlier runoff equivalent to **1 in 3 months** flow is considered to carry the high concentration of pollutant and need to be directed to the treatment system. The flow in excess of this generally is considered to be low in pollutant concentration and can be bypassed the treatment system.

Stormwater

1. Any proposed WSUD strategy must be shown on the stormwater plans, with all measures clearly labelled and detailed (cross-sectional diagrams, manufacturers specifications for proprietary measures etc.). MUSIC modelling must be submitted to demonstrate that the proposed treatment train achieves Council's pollution reduction targets, as per the DCP 2011. The Stormwater treatment should be installed to achieve the requirements of the section 3.3.6.1 of Parramatta City Council Development Control Plan 2011 and the manufacturer's specifications. Details of the proposed devices, their location and manufacturer's certification must accompany the application. In this regard:
 - a. Stormwater filter and other WSUD elements must be installed and designed 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 without the written approval from Council.
 - c. Stormwater Treatment Measures for the proposed development shall be designed in accordance with the requirements of the devices 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 on it.

Retaining Walls

1. If any earthworks are proposed, the following shall be provided:
 - (a) A separate cut and fill plan.
 - (b) All retaining walls that form part of this development shall be shown across all plans.
 - (c) All retaining wall details including top of wall, bottom of wall, wall type, cross-section for all wall types.
 - (d) The retaining walls shall be designed to ensure that natural flows from adjoining properties are not impeded or diverted.

Landscaping

The following is requested to be addressed regarding the landscaping and tree planting. Council considers adequate mature trees and landscaping vital considering the height of the development.

Trees

1. Trees along the southern boundary located within 10 Colquhoun St will be significantly impacted unless the bulk earthworks is amended and an adequate tree protection zone / exclusion zone established.
2. The Tree Protection Zone (TPZ) and exclusion zone must be shown on all plans, especially the civil bulk earthworks plans and in addition to this -
3. An Arboricultural Impact Assessment Report is to be provided as part of the SSDA assessment to ensure there is adequate tree protection measures and guidance on the exclusion zone / TPZ distance provided and coordinated with all disciplines to ensure the neighbouring trees within 10 Colquhoun Street are adequately protected.

Landscape

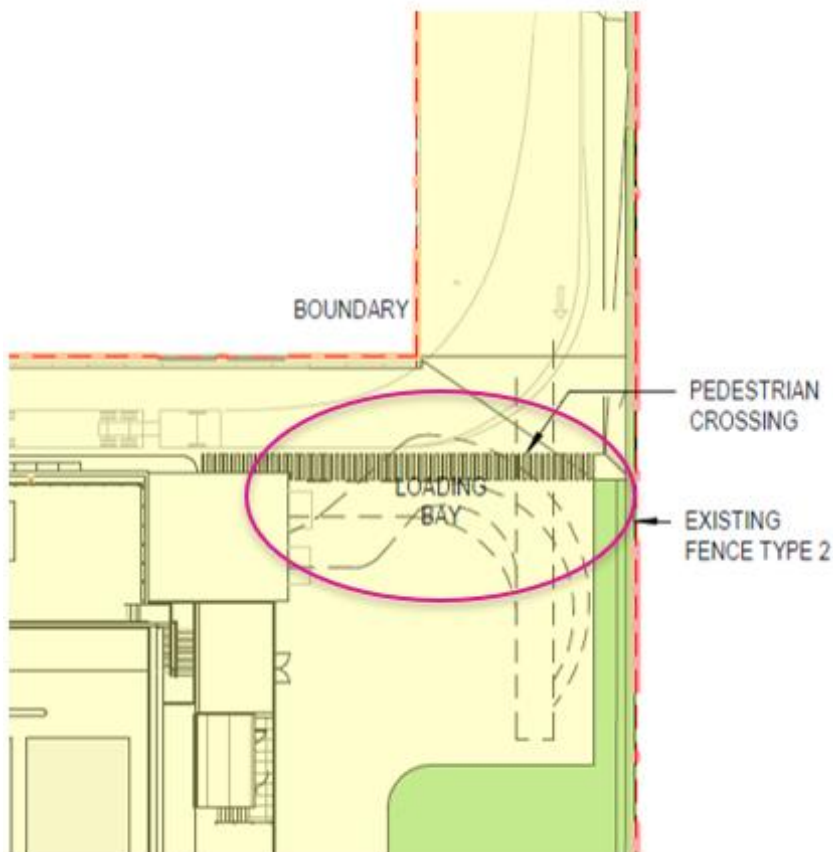
1. The landscape area is grossly inadequate across the Stage 2 development 4.8% and needs to be increased.
2. The deepsoil zone is inadequate across the site due predominantly to the parking areas and associated long driveway hard standing areas.
3. The proposed tree species are small/medium-sized trees and are recommended to be changed to larger canopy trees as there is plenty of room available for them to grow. Suggested species include:
 - *Corymbia eximia* (Yellow Bloodwood)
 - *Eucalyptus crebra* (Narrow-leaved Ironbark)
 - *Eucalyptus sideroxylon* (Mugga Mugga)
 - *Flindersia australis* (Crow's Ash)
 - *Corymbia maculata* (Spotted Gum)
 - *Syncarpia glomulifera* (Turpentine)

Note: The signature tree on the Landscape cover shows a Corymbia maculata but is not used in the scheme, this should be amended on the plans to be included.
4. In addition to the screen hedge planting proposed within the 2.5m landscape setback areas to the southern and western boundaries, additional medium-sized replacement trees are recommended to be planted along here at minimum 6m centres.

Traffic

The following is requested to be addressed:

- The swept paths of MRVs travels over the pedestrian crossing when accessing the loading, Dock. It is a safety hazard with no pedestrian management in place.



- The SEE refers to swept path analysis of an articulated vehicle (AV) using the loading area which is detailed in the Transport Impact Assessment (TIA). However, the TIA only provides swept paths of AVs circulating around the buildings and within the internal roadways without showing access to the “loading area”. It is unclear where the loading/unloading of AVs are undertaken within the site.

Conclusion

It is noted that this is the recommendation of Council officers.

Council appreciates the opportunity to comment on the above application, are supportive of the 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

Myfanwy McNally

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MANAGER, CITY SIGNIFICANT DEVELOPMENT