Our reference: P-704399-F2T3
Contact: Robert Craig
Telephone: (02) 4732 7593

25 June 2024

Nathan Stringer
Email: Nathan.Stringer@planning.nsw.gov.au

Dear Nathan,

Council Response to Request for Advice – Proposed Penrith Stadium Refurbishment at 143 Station Street, Penrith (SSD-68292713)

Thank you for providing Penrith City Council with the opportunity to comment on the abovementioned proposal.

Council has reviewed the information referred for comment and provides the following advice for the Department's consideration in relation to the proposal.

1. Planning Considerations

a) Council supports the objectives and design principles of the proposed development to deliver a multi-use venue that promotes universal accessibility and safety, activates the precinct (not only on event days but throughout the week) and improves the public domain on and around the site, including improved connections to all three street frontages, additional recreation spaces and retention and expansion of native tree plantings.

b) The expansion of uses for the redeveloped stadium, including additional sporting fixtures, concerts, community and cultural events and non-event day activities, is strongly supported subject to appropriate event management, protocols and procedures. This is consistent with one of the objectives of Council's Interim Centres Strategy to expand cultural, community and tourism offerings in the Penrith City Centre.

c) While the 'boundary strategy' on the eastern urban edge of the site (as discussed on page 35 of Architectural Design Report) is supported, the rationale for the timeline for its implementation (i.e. once residential development at 164 Station Street is realised)

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is not apparent. It is suggested that this timeline be reconsidered to encourage earlier activation of this edge, ideally at the completion of the proposed development.

d) The retention and expansion of native plantings is supported to connect and increase tree canopy, to bring cooling and amenity benefits and to "frame the field with a green backdrop". This is consistent with actions in Council's Interim Centres Strategy and Green Grid Strategy to increase shade in open spaces and the public domain. The expansion of native plantings along Ransley Street and Station Street and along the site's southern boundary is also consistent with actions to provide green and cool active transport connections to key destinations such as Penrith Stadium.

2. Stormwater Management

a) Stormwater drainage for the site must be in accordance with the following:

   i. Penrith Development Control Plan 2014;

   ii. Council's Stormwater Drainage Specification for Building Developments Policy;

   iii. Council's Water Sensitive Urban Design Policy and Technical Guidelines.

b) A detailed survey investigation of the existing stormwater pit and pipe network is required to determine pit and pipe locations, pit invert levels and pipe sizes.

c) A detailed stormwater concept plan, accompanied by a supporting report and calculations, shall be submitted.

d) A detailed hydraulic study is required to determine the capacity of the existing stormwater receiving systems. A hydraulic grade line analysis will be required of the street systems where the development proposes to discharge to ensure downstream capacity is available.

e) Water Sensitive Urban Design (WSUD) is required to be provided for the site. A WSUD Strategy shall be developed and shall include MUSIC modelling (*.sqz file) demonstrating compliance with

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Council's WSUD Policy and Technical Guidelines. The WSUD Strategy shall address (but not be limited to) water conservation, water quality, water quantity and operation and maintenance. The WSUD Strategy and MUSIC modelling must also demonstrate compliance with State Environmental Planning Policy (Biodiversity and Conservation) 2021, Chapter 6 (Water Catchments), Division 2, Section 6.6 (Water Quality and Quantity).

f) Details of proposed stormwater quality improvement devices are to be provided.

g) Details of heavy duty vehicular access to maintain any stormwater quality improvement devices are to be provided.

h) An updated Stormwater Management Strategy should be provided to include additional information on proposed water conservation measures and irrigation uses (e.g. demands, etc). Council's WSUD Policy requires that a minimum of 80% non-potable uses should be met with harvested rainwater.

i) Harvested rainwater for non-potable purposes should be maximised and allow for irrigation of all non-potable demands (as much as possible). It is noted that two rainwater tanks have been considered to allow for some reuse, however additional uses for non-potable demands should be considered (e.g. irrigation of landscaping/turf, etc). Tank sizes should be optimised by considering the diminishing rate of return.

j) With respect to the treatment of stormwater and the use of proprietary treatment devices (i.e. storm filters), it is recommended that these should only be used if site constraints prevent other options. As such, it is suggested that their use be reconsidered and the use of vegetated treatment systems (i.e. rain gardens) be incorporated into the design. This should be done with greater consideration to, and use of, harvested rainwater.

k) The use of vegetated solutions to treat stormwater are more in keeping with the intent of Council's WSUD Policy and Cooling the City Strategy, and provide for multiple outcomes such as contributing to urban heat mitigation, etc.

l) The stormwater treatment measures provided must be maintained in perpetuity and cannot be dedicated to Council. In

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this regard, site-specific operation and maintenance manuals should be provided.

3. Traffic Management

a) A revised Traffic Impact Assessment is required addressing the following matters:

i. Detailed traffic generation forecasting and subsequent road network impacts in accordance with TfNSW Traffic Modelling Guidelines. The traffic generation forecasts in the Traffic Impact Assessment (Table 4 and Table 5) should provide detail as to how the increased traffic generation has been calculated. Additionally, Table 5 should include additional traffic generation in the form of private vehicles dropping off passengers, taxi/ride-share and motorcycles.

ii. Intersection analysis of traffic impacts demonstrated with SIDRA data analysis and Level of Service (LOS) for pre and post development periods relating to:

- The intersection of Ransley Street and Station Street;
- The intersection of Station Street and Jamison Road.

iii. Investigation and conclusive statement as to whether any upgrades to the local road network will be required to cater for any additional traffic generated from the development.

iv. Independent Road Safety Audit (RSA) of the plans with specific regard to pedestrian and vehicular access.

v. Detailed information regarding heavy vehicle access and servicing needs of the development, and nomination of maximum vehicle size, frequency and inclusion of proposed manoeuvring which avoids any need for reversing into or from the site.

vi. Detailed Construction Traffic Management Plan (CTMP) with accompanying traffic controls plans (TCPs/TGSs).

vii. Details of accessible car parking spaces.

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viii. Details and locations of bus/coach drop-off and pick-up areas.

ix. Details and locations of taxi/ride share drop-off and pick-up areas.

x. Turn paths for heavy vehicles in accordance with AS 2890.2 clearly demonstrating satisfactory manoeuvring on-site and forward entry and exit to and from the public road network. Turn paths shall include required clearances and shall not encroach over kerbs or garden beds. The turn paths in the Traffic Impact Assessment only show a 12m Heavy Rigid Vehicle entering the site. The turn paths should how the vehicle exits the site.

xi. Turn paths are also to be provided for the following:

- Heavy Rigid Vehicles and Articulated Vehicles that will be required to transport rigging and scaffolding equipment for the set-up of a stage at the southern end of the playing field for any concert.

- Heavy Rigid Vehicles and Articulated Vehicles that are utilised as outside broadcast vehicles during NRL and NRLW matches.

4. Pedetrian Management

a) The Event Management Statement indicates measures to manage the movement of pedestrians across Ransley Street and Station Street will be detailed as part of a future Event Traffic and Transport Management Plan (ETTMP) that is to be developed in consultation with TfNSW prior to the opening of the venue. The ETTMP should be prepared in consultation with Council and be submitted for assessment as part of the SSD application.

b) In relation to game days/major events/concerts, the ETTMP should include a risk assessment and detail a proposal for pedestrian protection measures (such as, but not limited to, placement of bollards and/or approved fencing) to prevent internal vehicle manoeuvres by errant/non-compliant drivers attempting to:

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i. Park on adjacent open areas (including paved and open grass areas to the west and south of the stadium);

ii. Park on any pedestrian pathways;

iii. Drive on or over pedestrian pathways to access other areas;

iv. Access open areas of Crown land via the Howell Oval car parking areas and driveway, which would compromise pedestrian safety and movement of pedestrians between Mulgoa Road and the stadium.

c) The ETTMP should include details of management and actions to mitigate any potential hostile vehicle situations (Hostile Vehicle Management – HVM).

d) Consideration should be given to the provision of a pedestrian barrier fence along the eastern side of Mulgoa Road within the vicinity of the sewer pump station to ensure pedestrians utilising the path at the southern side of the sewer pump station are directed towards the pedestrian crossing facilities at the signalised intersection of Ransley Street and Mulgoa Road.

e) Within Ransley Street (southern side), the development works will need to include the removal of the existing dwarf retaining wall adjoining the northern hill area, removal of the existing footpath, regrading of the verge area, adjustment of utility service lids and provision of new full verge width footpath paving (i.e. back of kerb to property boundary) for the full length along the southern frontage of Ransley Street. The current footpath along Ransley Street is inadequate for the pedestrian volumes generated on NRL game days as Ransly Street is utilised as the main pedestrian thoroughfare for patrons entering the stadium at the eastern and western gates.

f) Within Station Street (western side), the development works will need to include the removal of the existing 1.8m wide footpath and replacement with a new 3m wide (minimum width) footpath for the full length of the property frontage along Station Street.

g) The proposed footpath from the south-western entry gate to Station Street should be widened to a minimum of 3m to accommodate the anticipated pedestrian traffic exiting the site.

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5. Subdivision

a) The proposed subdivision seeks in part to utilise the southern edge of an existing concrete path to define the boundary between proposed Lots 101 and 102. This path is required to be widened to accommodate the increase in pedestrian traffic and as such the plan of subdivision should be amended and finalised post construction of all civil works.

b) A splay corner is to be dedicated as road reserve at the north-eastern corner of the site, being at the south-western corner of the intersection of Station Street and Ransley Street, to align with the existing site fencing.

6. Hazardous Materials

a) Hazardous materials have been identified in some of the site structures, although it is noted that not all structures and spaces have been accessed at this stage. Hazardous materials should be removed prior to general demolition works. Additional pre-demolition hazardous materials surveys are required for all structures to be demolished.

7. Food Premises

a) Detailed fit-out plans for the food and beverage outlets, kitchens/bars and food trucks proposed to operate at the venue are to be provided to assess compliance with the Food Safety Standards and AS 4674-2004 – Construction and Fit-Out of Food Premises.

8. Tree Management

a) Consideration should be given to retaining all trees south of the existing warm up field. This could be achieved by reconfiguring the car park. In this regard, there is an inconsistency regarding the reasoning for trees to be removed and those to be retained at the southern end of the field where trees are adjacent to each other and impacted by the same work, yet one is proposed to be retained and another removed.

b) The kiosks on the eastern boundary will have impacts on the already constrained trees in this location. Existing hardstand would

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need to be utilised and pedestrian movements directed to avoid impacts to the existing trees. A design that provided these trees with a greater amount of open porous ground would be desirable. Construction on piers as recommended in the Arboricultural Impact Assessment is not supported as even though this is less impactful than constructing on ground, the kiosks will create a rain shadow that will cover the very limited open porous ground already provided.

c) It is unclear what the purpose of the "deep soil under pave" calculation represents and whether it indicates that porous paving or perhaps tree pits will be installed in these locations. Either of these treatments are not recommended within the TPZ of existing trees due to the impacts/root damage caused to existing trees. Where existing hardstand exists, it could be replaced with a new surface provided that soil compaction is not required and construction techniques do not impact existing tree roots.

d) Although the Arboricultural Impact Assessment provides a (limited) methodology for the installation of paving, there is no evidence these considerations have been considered/adopted within the landscape design documentation or that they are viable.

e) There are trees on the adjacent Howell Oval site likely to be affected by the proposed paving for the entry path from the western side of the site that have not been assessed.

f) A site-specific Tree Protection Plan (Specification and Drawing) that has been prepared in consultation with all disciplines is required once the final design for the site is completed.

9. Public Domain/Landscape Design

a) Public Domian Report

i. 4.1 - Design Principles

- Urban markers – needs to acknowledge Station Street as an entry to the CBD from the south and an opportunity to mark the southern stadium corner. Urban markers should be integrated with, and extend to, pedestrian wayfinding.

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- North-eastern entry precinct – shaded character to match entry from the south-west, retaining and protecting existing significant trees.
- Circulation/connectivity with surrounding public domain is unclear. Pedestrian access from the south (street parking) and cycle access is not addressed. Disability access and cycle access is not shown.
- Streetscape address and visual impact is not acknowledged, including impacts to public domain of built form bulk and scale, back of house, lack of activation, public art and screening potential, signage and advertising and temporary parking areas.
- Accessible parking and drop-off may not be compliant. Pedestrian access is not shown from parking spaces.
- Emergency access arrangements need to be detailed. If there is no proposed access, access from Mulgoa Road at the north-western corner should be removed and replaced with planting.
- Green and blue infrastructure strategies need to be explained.

ii. 5.2 - Apparent Pedestrian and Vehicular Conflicts

- Shared use pavement areas are to be demonstrated in both event and non-event modes.

iii. 5.4 - Landscape Site Plans

- In terms of safety, the location of the kid zone located adjacent to the north-eastern entry requires review.

iv. 5.5 - Design Concept

- The proposal is unclear regarding the eastern edge and access to facilities. Activation of this part of the site may not be viable if amenity is not delivered.
- Excessive hardscape areas and lack of softscape to support existing canopy trees.
- Planting strategy – species should be climate resilient and appropriate (over endemic species). Large endemic trees are not supported unless within extensive softscape surrounds capable of supporting mature root zones. Exotics in the urban context are supported, where

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appropriate. There is a lack of detail regarding existing trees for removal (tree removal is not supported on the grounds of design).

- Provide metrics to demonstrate proposed canopy cover (there is a lack of new large canopy trees).
- Shade structures at the community space will support users until canopy cover is established. A diagram showing the extent of permeable areas would assist in understanding the viability of proposed canopy cover. Deep soil and permeability are interdependent and will inform canopy viability.

b) Landscape Documentation

i. Perimeter

- Continuation of street trees and setback fences from boundaries (Ransley Street) for improved streetscape.
- North-eastern corner – significant existing canopy trees will be compromised with extensive hardstand beneath.

ii. Station Street

- East and west architectural facades should have equal design attention and merit. There appears to be lesser visual amenity for the streetscape and eastern built form seen from the public domain in Station Street.
- Lighting design for pedestrian paths along the south of the stadium is to consider CPTED principles and the path is to be more generous.

iii. Reduction in permeable surfaces is warranted. Excessive hardscape areas will contribute to heat and should be reduced in extent.

iv. Limited seating is provided. Seating should be inclusive and provide a minimum of 40% with backs and armrests as well as in-line seating opportunities for those in wheelchairs or with strollers.

v. There is a lack of information regarding the community space and kids zone in terms of function, materials, shade, etc.

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vi. Locations of signage and advertising boards are not indicated. These will impact the public domain and nearby future residential uses.

vii. The plant schedule suggests large trees, however mostly small trees are proposed on the plans. Larger trees will ameliorate the height, bulk and scale of the built form as well as provide better quality and more effective shade.

10. Council Asset Management

a) A plan showing proposed areas of maintenance responsibilities shall be provided for all open space and public domain areas, depicting areas that are to be maintained by Venues NSW and areas that are to be maintained by Council.

b) Prior to the commencement of any works:

i. All permit applications and bonds required for the works must be submitted;

ii. Traffic management plans are to be submitted and endorsed by Council;

iii. Dilapidation surveys in relation to any Council assets adjoining the site are to be completed and submitted to Council. Repair of any damage caused to Council's assets will need to be completed by Council's contractors and will be charged to the proponent.

11. Social Impacts

a) The construction phase is likely to produce short-term negative social impacts associated with noise, traffic and visual impacts over the 18 month construction period.

b) The refurbished stadium is unlikely to have negative social impacts during operation, noting however that some existing users have raised concerns with changes to their use of the stadium. Council supports the development and implementation of a Communication and Engagement Plan.

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c) Overall, the refurbishment of the stadium will have a number of positive social impacts. While the construction phase will disrupt community use of the facility, there is overall a number of positive social impacts as outlined in the Social Impact Assessment (SIA).

d) The SIA outlines appropriate mitigation measures (Table 19) with regard to identified impacts. Council supports the outlined monitoring and management framework to ensure that positive social impacts are recognised, and negative social impacts are minimised.

e) Council supports the consideration of developing and implementing social procurement and employment practices to involve marginalised groups, as well as developing workplace management plans that encourage and support diversity.

12. Community Engagement

a) The Consultation Summary Report outlines that consultation undertaken to date has included engagement with the local community, neighbours, key stakeholders and government authorities and agencies to present an overview of the proposed development and to gather feedback during the design of the proposal. Comments received from this consultation (stadium seating; queues and pedestrian flow; amenities; community and regional hub) have been addressed in the Environmental Impact Statement and SIA. Ongoing community engagement is required to ensure that risks to the community are minimised throughout both the construction and operation of the stadium.

b) Regular and ongoing communication must be maintained with key stakeholders to notify of upcoming works and changes to access and amenity (e.g. signage to notify of noise, pollution and closures).

13. Public Art

a) Council encourages the exploration of ways to incorporate public art into the design of the stadium, including ways to highlight connection to community. The use of a local artist is encouraged to deliver any public art.

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14. Community Safety

a) Section 6.1 of the Crime Prevention Through Environmental Design Report includes a detailed series of recommendations to improve safety and security for the site and these are supported for implementation. These recommendations cover key principles of surveillance, lighting and CCTV, territorial reinforcement, environmental maintenance, activity and space management and access control.

Should you wish to discuss any of the above matters further, please do not hesitate to contact me in the first instance on (02) 4732 7593.

Yours sincerely,

Robert Craig
Principal Planner

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