



THE HILLS
Sydney's Garden Shire

THE HILLS SHIRE COUNCIL
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27 May 2022

Director – Key Sites Assessment
Department of Planning, Industry & Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Your Ref: SSD-15882721

Dear Sir,

**Comments on Doran Drive Plaza Precinct
LOT 55 in DP 1253217**

I write to you in response to the Applicant's response to submissions for the State Significant Development Application for the Doran Drive Plaza Precinct. The following comments are provided by Council staff:

Unit Mix

It is acknowledged that the master plan approval includes a requirement for at least 10% of the dwelling yield to include 3 + bedrooms. However, this is still considered this to be inadequate. The unit mix requirements within Council's LEP have been uniquely tailored to suit the Hills demographic. The controls seek to ensure a sufficient number of larger apartments are available to provide an affordable housing option for families, not just lone person households and couples without children. The Atlas Housing Market Analysis correctly identifies a 'hole' in the 20-39 year age cohort within Castle Hill, which is considered to be due to a lack of affordable housing options being available for young families. A greater provision of larger apartment stock, consistent with the requirements of Council's LEP, would assist in addressing this issue.

The statement regarding options for smaller households is only partially accurate, as it only addresses part of the housing issue. Whilst it is acknowledged that there needs to be more housing options for smaller household types, there also needs to be more 'high density' housing options for larger household types. Based on Council's standard mix which requires a minimum 20% 3+ bedroom apartments, this would mean that 80% of the units being delivered would be smaller and capable of being occupied by couples without children and lone person households. The major household typology that has not been considered is 'family households' that are seeking to reside within high density apartments. Suitable housing must be available for families that wish to access the benefits of living within accessible locations close to jobs, services and amenities. If high density development, such as this, do not incorporate sufficient family units as part of their overall mix then these households will effectively be locked out of the high density market and they will be forced into traditional detached housing, which they may not want to pursue for financial or lifestyle reasons.

Comments within the Housing Market Analysis relating to existing supply of larger dwellings also do not acknowledge the fact that a substantial portion of existing larger dwellings, particularly in areas such as Castle Hill, will be lost to make way for high density development close to the metro.

With respect to Council's Housing Strategy, it also states that 'with larger households remaining the dominant household type, the projected capacity in low and medium density housing areas will not be able to accommodate all family households. Accordingly, a proportion of high density dwellings must be able to accommodate larger households'. When accounting for the Department's Household Forecasts, and the remaining capacity within the Shire's land release areas, the Housing Strategy advises that of the 24,000 apartments required by 2036, around 7,200 will need to cater for families. If high density development only provides 10% of its stock as 3+ bedrooms then this will result in an shortfall in the provision of family household types within high density precincts. This will unreasonably restrict housing diversity and lock-out a substantial demographic.

Traffic

It is acknowledged that a SIDRA model has been provided to demonstrate that the vehicle trips generated from the proposed development will not have unacceptable traffic implications on the surrounding road network and intersections. Swept path analysis have also not been provided for a 12.5m HRV turning right from the loading dock onto Andalusian Way. If there is insufficient clearance to facilitate a 12.5m HRV turning right from the site onto Andalusian Way, it is recommended that the loading dock driveway be reconfigured to cater for the right turn movement. Alternatively, NO RIGHT TURN signs shall be installed within the site boundary facing exiting vehicles from loading dock at no cost to Council.

Driveways to the site must also be designed such that there are minimum sight lines for pedestrian safety as per Figure 3.3 of AS 2890.1.

Parks and Infrastructure

Space around the Bus Shelters

The allowable pedestrian space behind the bus shelters and fronting the plantings should be widened (this narrow section will act as a pinch point). The increase in distance between these two components of infrastructure will cater both for the many pedestrians that will be walking down to the Metro and bus commuters lining up under and around these shelters noting that the majority of users will be in transition from the events which occur at the showground.

Public Arts as a Water Feature

Concern is raised as to the ongoing cost of maintenance that Council would inherit once the site – directly off Doran Drive is handed over to Council to maintain. If any water feature was to be planned for this location, Council staff would prefer a static robust water less feature rather than a high ongoing costly water feature which council would not have the resources to maintain or replace.

Acoustic Impacts from The Showground

All windows and doors (accessing or facing the showground directly) are to be double glazed to mitigate potential noise impacts as it is expected that events at the Showground will generate substantial sound that will impact on this and other nearby residential / apartment towers.

Waterways/Flooding

The proposal is considered acceptable provided the issues discussed below with regards to flooding and the management of the quantity and quality of stormwater leaving the subject site are addressed.

1. Being located near the top end of the catchment, the site will only be subject to potential overland flooding from an external catchment east of Andalusian Way. Being bounded along all sides by roads, overland flows will be captured and conveyed via the road network. We note based on Council's available flood mapping, the subject property is outside the 1% AEP Flood Extents of the nearby Cattai Creek.

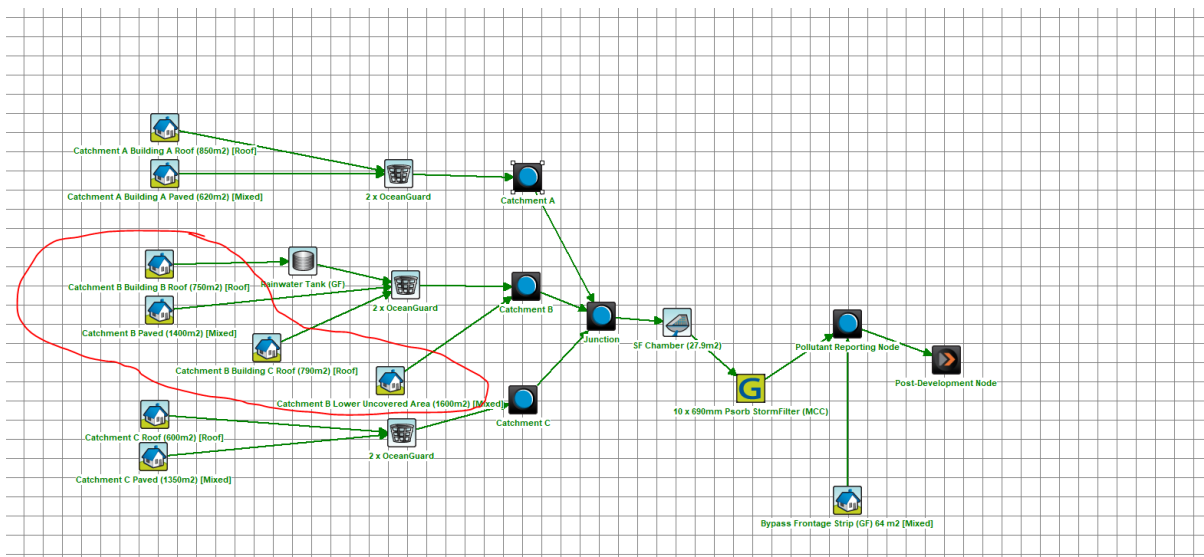
2. The Hydrology (DRAINS) and Hydraulic (TUFLOW) models developed as part of the proposed development have been reviewed and found satisfactory and acceptable to Council staff.
3. AR&R2016 rainfall has been used in the hydrologic modelling. The Hills Shire Council (Council) has yet to adopt the AR&R2016 rainfall but Council staff accept these results as this proposal is a State Significant Development and the Flood Impact Assessment report is prepared for Department of Planning Industry and Environment (DPIE).
4. The flood modelling results show shallow flooding depths up to 30mm within the adjoining roads/streets of the proposed development in a 1% AEP design storm. The flood waters are confined to the road reserve in all the design flood events up to the PMF. The proposed development has negligible flooding impact on the surrounding properties and assets/ infrastructure. This outcome is acceptable to Council staff.
5. Flood Planning Level (FPL). To ensure no ingress of overland flows into building and basement car park entry points, the report has to demonstrate that all the entries (driveways/lifts/stairwells) to the proposed development including the basements are protected up to FPL level. This can be tabulated showing the FFL and FPL levels at all the entries. The reference locations can be shown as a markup on the Architectural drawings/plans. The consultant is to refer to THSC DCP Part C Section 6 Flood Controlled Land for details on flood planning levels applicable to mixed-use developments.
6. Shelter-in-place during a flood emergency worse than a 1% AEP flood event is the best option for the proposed development. But if flood evacuation is necessary due to a medical or fire emergency, building occupants will take Mandala Parade and Andalusian Way and proceed north along Carrington Road and turn east to Showground Road. This evacuation route needs to be indicated in a Flood Evacuation Plan that will form part of the site's Flood Emergency Response Plan.
7. On-site stormwater detention (OSD) is proposed to manage the runoff generated within the proposed development up to the 1% AEP. At the detailed design stage, the final OSD plans and details have to be provided to Council for further review. The drainage layout is to include how the site's OSD and drainage system will connect to the adjoining existing street drainage system and how bypassing flows are managed through downstream areas.
8. A stormwater quality treatment or water sensitive urban design (WSUD) strategy needs to be incorporated in the stormwater management plan for the proposed development to treat flows leaving the subject site.
9. The proposal needs to demonstrate the proposed mixed-use development will meet the required water quality objectives tabled below. Pollutant Average Annual Pollutant Load Reduction Objective (%) Gross Pollutants (>5mm) 90 Total Suspended Solids (TSS) 85 Total Phosphorus (TP) 65 Total Nitrogen (TN) 45 10. In addition to the above comments, the detailed design of the proposed development needs to consider the following recommendations from the Flood Impact Assessment report to manage flood risk.

Engineering

1. Stormwater

With respect to DRAINS model and the OSD, I assume that future submission from applicant to the DPIE (i.e stormwater plan including OSD cross-section) will be consistent with the provided Drains model and applicant's engineer will be avoiding "Effects of Downstream Drainage on Outlets" part C only. Please note that partial submerge OSD/outlet can be considered. Reference is made to the previous assessment.

With respect to the MUSIC model, in principle, I have no issues with the design but the MSUIC model will need to reflect the correct total catchment area (i.e catchment B on model is 4540sqm but the draft plans shows 5063sqm), refer to the snapshot below:



Also, they are proposing to have a split pit to direct the low flow toward the stormwater filters and council has no problems with this but the levels from these pits and pipes shall be consistent.

2. Flood Impact Assessment

The Flood Impact Assessment prepared by ACE Civil Stormwater Services Pty Ltd, was reviewed and the following comments are made:

The applicant's engineer from ACE Civil Stormwater Services Pty Ltd, shall review the last recommendation under section 7.1 of the Flood Impact Assessment (i.e. The design of the OSD should be updated to capture the 1% AEP runoff for the future climate (0.2% AEP event)). Please be advised that a regional basin/OSD is available to service this catchment, and OSD is not required for this catchment. The only reason that OSD was required was because the development is crossing a catchment and flows have been concentrated into 1 single point (i.e OSD was provided to ensure that the underground drainage system can cater for the additional flow and that the pits on street will not surcharge).

Therefore, the recommendation from the Flood Impact Assessment will need to be revised to remove the above recommendation or alternatively, the recommendation will need to be adopted by the applicant and OSD will need to be provided in accordance with the recommendation above.

3. Groundwater Assessment

It was noted that the groundwater removal figures have been updated so they are now below the threshold in response to Council pointing out the limits (i.e. 3ML/year) in the original report from November. The DPIE is responsible for the assessment/ determination of the SSD application, therefore, should the department deem/determine that the exemptions issued by NRAR is applicable or not.

Should you have any questions, please contact me at cdugan@thehills.nsw.gov.au or 9843 0334.

Yours faithfully,

Cynthia Dugan

PRINCIPAL CO-ORDINATOR – DEVELOPMENT ASSESSMENTS