



Suzannah Byers
Senior Planning Officer, State Significant Acceleration
NSW Department of Planning and Environment
4 Parramatta Square
12 Darcy Street
Parramatta NSW 2150

By email: suzannah.byers@planning.nsw.gov.au

27 January 2023

Dear Ms Byers

**GQ Parramatta – Proposed Mixed Use Development SSD-35609161
12 Hassall Street, Parramatta (Site)**

NSW Police Force (NSWPF) Submission on Applicant Additional Information

Summary

- 1 We refer to the above State significant development application, which proposes a 61 storey mixed use building that includes:
 - (1) 5 levels of basement parking with 175 car spaces;
 - (2) 4 storey podium containing a café, retail, gym, commercial floor space and residential amenities;
 - (3) Podium terrace with a swimming pool on Level 4;
 - (4) Residential tower (Levels 5 to 59) providing 391 build-to-rent apartments; and
 - (5) Rooftop terrace, pool and lounge on Level 60,(the ***Proposed Development***).
- 2 Thank you for the opportunity to respond to additional documents submitted by the Applicant to the Department of Planning and Environment (**DPE**).
- 3 NSWPF has previously raised traffic and security concerns regarding the likely impacts of the Proposed Development on NSWPF Headquarters (**PHQ**). PHQ is a highly sensitive and critically important site to the State of NSW.

POLICE PROPERTY GROUP

Locked Bag 5102 Parramatta NSW 2124

T 02 9768 0553 W www.police.nsw.gov.au

TTY 02 9211 3776 for the hearing and speech impaired ABN 43 408 613 180

TRIPLE ZERO (000)

Emergency only

POLICE ASSISTANCE LINE (131 444)

For non emergencies

CRIME STOPPERS (1800 333 000)

Report crime anonymously

- 4 PHQ is located at 1 Charles Street Parramatta, which adjoins the Site on its northern and eastern side. All vehicles accessing PHQ enter and exit via a driveway on Hassall Street immediately adjacent to the western boundary of the Site (where the Applicant proposes to locate the driveway for the Proposed Development).
- 5 On 5 October 2022, the DPE requested that the Applicant engage in discussions with NSWPF regarding its concerns about the Proposal and provide any additional information to the DPE by 24 October 2022.
- 6 NSWPF representatives met with representatives of the Applicant on 5 October 2022 and 16 November 2022.
- 7 The Applicant has submitted to the DPE further information, which includes:
 - (1) Addendum Submissions Report prepared by Think Planners dated November 2022 (**Applicant's Addendum Submissions Report**);¹
 - (2) Northern Façade Separation Analysis (Drawing SK-1031 Rev. A);²
 - (3) Northern Façade Screening Plans (Drawing SK-1032 Rev. A);³
 - (4) Northern Facade Elevation and Details (Drawing SK-1033 Rev. A);⁴
 - (5) Sight Lines for Pedestrian Safety Plan (Drawing SK-1013 Rev. B);⁵ and
 - (6) Response to matters raised by NSWPF, prepared by Positive Traffic dated 8 November 2022 and appending vehicle queuing assessment plans prepared by PTW Architects (**Applicant's Traffic Response**).⁶
- 8 NSWPF acknowledges that the Applicant's proposed amendments go some way to mitigating the likely impacts of the Proposed Development on PHQ. However, NSWPF continues to have significant concerns about the Proposed Development, in particular the proposed location of a driveway on the western side of the Site (contrary to DCP controls) and directly adjacent to the PHQ driveway and ramp.
- 9 Two key risks arise. First, NSWPF vehicles are stationary as they wait to enter or exit PHQ. The Proposed Development with its driveway, and traffic entering and exiting the development directly adjacent to the PHQ driveway, greatly increases the security risk to NSWPF personnel and visiting government officials in those vehicles.
- 10 Potential threats to the security of PHQ and its occupants are not hypothetical. PHQ has already been the target of a fatal terrorist attack in 2015.

¹ <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=RFI-49028213%2120221120T225945.168%20GMT>.

² <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=RFI-49028213%2120221120T225944.836%20GMT>.

³ <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=RFI-49028213%2120221120T225943.704%20GMT>.

⁴ <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=RFI-49028213%2120221120T225944.363%20GMT>.

⁵ <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=RFI-49028213%2120221114T012229.693%20GMT>.

⁶ <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=RFI-49028213%2120221120T225943.925%20GMT>.

- 11 The second risk arises from potential delays caused by traffic to and from the development delaying the entry and exit of police vehicles into PHQ.
- 12 In particular, delays in exiting PHQ impact on the emergency response time for first responders, which is a significant and critical negative impact for the community.
- 13 These matters engage section 4.15(1)(b)-(e) of the *Environmental Planning and Assessment Act 1979*. Unless they are satisfactorily addressed, NSWPF's objection to the Proposed Development stands.

Driveway Location

- 14 NSWPF notes the suggestion in the Applicant's Traffic Response of a consent condition requiring 'a traffic signal management system which includes forewarning flashing lights / signage to advise entering / exiting traffic of a large waste vehicle using the loading dock facility'. There are no details as to how this system would precisely operate. It is far from certain that it would adequately resolve traffic and pedestrian safety issues arising from two sizeable car parking ramps located next to each other. Those issues include, but are not limited to, waste and service vehicles.
- 15 The Applicant also proposes to relocate the vehicle control access point from the Site entry (which would permit queuing of only 2 vehicles) to between Basement Level 1 and Basement Level 2. The amendment is shown in the internal queuing plan provided in Appendix B of the Applicant's Traffic Response. The plan suggests this measure would enable up to 21 vehicles to be queued. The result would be partly ameliorative, although NSWPF is not convinced that 21 vehicles represents 50-65% of the entire peak hour traffic generation for the Proposed Development.
- 16 Even with the mitigation measures now proposed by the Applicant, the likelihood remains that a high number of competing traffic movements will occur in close proximity to one another, it should be noted this is a risk exacerbated by the need for police units to sometimes depart PHQ urgently at speed.
- 17 The proposed western location of the new driveway would also result in adverse sight lines for vehicles exiting the respective sites. There is a solid concrete wall on the PHQ boundary which will restrict the ability of drivers travelling up the PHQ exit ramp to sight vehicles entering or exiting the Site. This concrete wall is shown on the Applicant's Sight Lines for Pedestrian Safety Plan (Drawing SK-1013 Rev. B), albeit that plan addresses a different sight line issue.
- 18 The Applicant's Traffic Response includes this comment at page 2:

'The relocation of the driveway to the western boundary of the site places the entry access as far as possible from any impact of westbound queued traffic in Hassall Street at the traffic signals with Charles Street which may currently occur at times or may occur in the future'.
- 19 However, this issue was previously examined in section 4.4 (pp 17-19) of the May 2022 Traffic and Parking Assessment Report (**Applicant's Traffic Report**).⁷ Section 4.4 included consideration of whether potential queueing eastbound in Hassall Street at the

⁷ EIS Appendix 22 Traffic Impact Assessment Statement:
<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-35609161%2120220513T070106.306%20GMT>.

signalised intersection with Charles Street had any bearing on the Site's driveway location. The report concluded that the potential 95th percentile queue at this signalised intersection, 'would have no impact on the driveway access to No.12 Hassall Street irrespective of its location'.

- 20 Hassall Street has an east-west alignment with a single lane in each direction across the frontage of the Site. However, immediately west of the PHQ driveway, Hassall Street operates as a one way lane westbound with parallel parking on both sides of the street. The Applicant's Addendum Submissions Report states:

'Gurner supports NSW Police in any request it makes of the City of Parramatta Council to improve NSW Police accessibility in the vicinity of the site, in particular making the western end of Hassall Street two way for police vehicles only, and any pedestrian measures implemented that would encourage pedestrians to use the southern side of Hassall Street to reduce conflict with the NSW Police existing vehicle entry and exit point'.

- 21 These changes could have reduced some of the negative impacts on PHQ of locating the Proposed Development's driveway on the western end of the Site's Hassall Street frontage. However, Council's position appears to be that it will not under any circumstances alter the current arrangements for traffic direction and pedestrian access along Hassall Street. Accordingly, the prospect of any such changes cannot be assumed in assessing the merits of the Proposed Development.

Increased Traffic

- 22 NSWPF's concerns about the proposed location of the driveway is compounded by the prospect of significantly increased traffic. The Proposed Development will include 391 build-to-rent apartments and 4 storeys of commercial/retail space. A total of 175 spaces will reportedly be available in the multi-level basement car park. It is not apparent whether this parking provision will adequately meet the demand of all Site users or result in further pressure on on-street and off-street parking in the vicinity.
- 23 Section 4.2 of the Applicant's Traffic Report includes comments on estimated traffic generation from the Proposed Development. The residential component alone is said to have the potential to generate between 59 and 75 trips per hour in the AM and PM peak periods. However, the report suggests that, due to the 'generally low' maximum parking rates applicable to the Site, a more appropriate estimate of potential AM/PM peak hour traffic generation is 16-35 trips.
- 24 In relation to the 'commercial' component, the Applicant's Traffic Report suggests that the commercial floor space on the ground to second floors is expected to result in 'negligible' traffic generation. Only 5 car spaces would likely be allocated to commercial/retail uses at the Site. The Applicant's Traffic Report rejects the traffic generation rate of 1.2 to 1.6 trips per 100m² GFA (equivalent to around 49 to 66 peak hour trips) for an office building, which is cited in Roads and Maritime Service Technical Direction TDT 2013/04a (Guide to Traffic Generating Developments). The reason given is that this rate is 'not considered reflective of the ancillary nature [of] the commercial / retail / café / gymnasium areas proposed within the development'.
- 25 The plans submitted by the Applicant with its Response to Submissions Report in October 2022 depict a café, retail and a gym on the Ground Floor, with the gym extending to

Level 1.⁸ A gym, in particular, could attract increased non-resident vehicular traffic to the area.

- 26 The Applicant's Traffic Response refers to 'area wide traffic modelling assessments within the Parramatta CBD and surrounds for major project proposals' before stating:

'This particular development is estimated to generate in the order of 30-44 peak hour trips (1 vehicle on average every 1.5-2.0 minutes in the peak hour) which is low'.

- 27 The basis for this estimate, which seems to refer to all components of the Proposed Development, is unclear. NSWPF has concerns about the estimate's predictive reliability and the relevance of area wide traffic modelling generally in the specific circumstances of PHQ. The NSWPF submits that further details should be provided by the Applicant to enable an informed basis to alleviate genuine concerns.

Construction Impacts

- 28 NSWPF does not agree with the following statement on page 3 of the Applicant's Traffic Response:

'The recent completion of the University of Western Sydney development on the western side of the NSW Police access driveway confirms that the potential impact of construction vehicles for a much larger scale development can be appropriately managed whilst ensuring safe and efficient entry / exit access for the NSW police driveway in Hassall Street'.

- 29 Construction of the 19 storey mixed use development at 2-6 Hassall Street (SSD-9670 Western Sydney University Innovation Hub), together with other projects in the vicinity of PHQ, impacted access to and from PHQ over an extended period. Traffic conditions in Hassall Street were frequently at a standstill, immobilising NSWPF vehicles while attempting to enter and exit the PHQ ramp. This had consequences for the security of personnel as well as police response times. NSWPF is keen to avoid any repetition in connection with the Proposed Development.

- 30 The Applicant's Traffic Response notes that any works on Site would require approval by both Transport for NSW and City of Parramatta Council of a Construction Traffic Management Plan. The 29 March 2022 Construction Traffic Management Plan in Appendix 27 of the EIS lacks any sufficient detail to sustain confidence about this issue.⁹ For instance, section 3.9 on 'Construction Traffic Volumes' includes the remark: 'A construction project of this scale is not expected to have any noticeable detrimental impact on the road network, however this is subject to further information and analysis'. This is followed by Table 3.2 (Estimated Construction Vehicle Volumes) and Table 3.3 (Typical daily volumes), both of which are blank.

- 31 In addition to traffic impacts, installation of any crane on the Site would create security risks for NSWPF operations within PHQ. We require details of any tower crane that is likely to be used at the Site, such as the type, height, potential for electromagnetic interference,

⁸ 5b. Architectural Drawings Full Pack Updated – Part 1 (Level 00 Ground Floor Plan DA-10-1000 Rev A and Level 01 Floor Plan DA-10-1100 Rev A):

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=EXH-46763957%2120221004T031026.738%20GMT>.

⁹ <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-35609161%2120220513T070104.485%20GMT>.

NSWPF has informed the Applicant that the NSWPF will not approve the use its air space above PHQ.

- 32 The Applicant's Addendum Submissions Report anticipates 'as part of the Construction Certification process':
- (a) A Construction Management Plan that includes details of how Hassall Street will remain free of vehicles during construction
 - (b) A Loading Dock Management Plan
 - (c) An After Hours Access Plan (noting that NSW Police is supportive of basement access control at the top of the ramp during non peak periods)'.
- 33 Paragraph (c) does not reflect NSWPF's position. NSWPF had understood that the basement car park would accommodate sufficient internal queuing that the same vehicle control access arrangements could operate 7 days per week and not reduce to top-of-ramp control during non-peak periods.
- 34 There does not seem to be any realistic possibility that Hassall Street could 'remain free of vehicles during construction'. NSWPF submits that advanced drafts of each document in (a)-(c) above should be provided to TfNSW for review and comment before the assessment of SSD-35609161 is completed. Further, if development consent were to be granted despite this submission, it should be a condition of any consent that NSWPF is consulted in relation to each of these documents prior to them being approved.

Other Impacts

- 35 The Applicant has proposed architectural amendments to the northern façade of its development. According to the Applicant's Addendum Submissions Report, these comprise:
- (1) on Levels 1 to 3 – fixed aluminium louvres angled to 45 degrees in a north east direction; and
 - (2) on Levels 5 to 14 – a combination of graded density fritted glass (for windows) and angled frosted louvres (for balconies).
- 36 NSWPF has not been provided with any visual analysis that models the effectiveness of these screening treatments on line of sight from the Proposed Development into PHQ. Prima facie, however, they would appear to reduce the potential for visual surveillance of PHQ and the risk of projectiles emanating from the northern side of Levels 1-3 and 5-14 of the Proposed Development.
- 37 That said, NSWPF has reservations about some aspects of the proposed screening mitigation. The Level 4 podium terrace is not addressed by it. There the Applicant seems to be relying on landscaping. The plans also contain ambiguous notations as to whether the screening is to 'L13' or 'L14', which should be clarified. NSWPF submits that the screening ought to extend at least to the level above the roof top of 1 Charles Street. Limiting it to Level 14 of the Proposed Development would still leave PHQ vulnerable. Moreover, NSWPF requires that there be frosted glass and angled fixed louvres to at least one level above the PHQ roof so as to prevent viewing into NSWPF offices and the potential for projectiles from the Proposed Development which has previously been verbally agreed between the Applicant and the NSWPF.
- 38 The Applicant's Addendum Submissions Report indicates that, 'outside of the SSD Application process', the Applicant is committed to preparing an MOU with NSW Police in

relation to effective communication and adopting a tenant policy that requires no firearms to be on the premises. Whilst these comments are appreciated, it is difficult to assess their efficacy until NSWPF has been provided with the Applicant's proposed documentation (including its building management plan and tenant selection policy).

- 39 NSWPF has also not seen any draft emergency management plan that takes into account the proximity of the Site to PHQ. If there is a major event or incident at PHQ, the immediate surrounding area will need to be quickly evacuated and locked down. This would be practically difficult and risky in the absence of an appropriate plan, especially given the substantial residential occupancy of this 61 storey tower.

Conclusion

- 40 NSWPF appreciates the Applicant's efforts in considering and proposing mitigation measures. However, the information provided to date fails to demonstrate that the Proposed Development would avoid unacceptable impacts on the security and operational use of PHQ. In particular, the driveway location remains highly problematic and the information provided about screening is not satisfactory. NSWPF notes that the Applicant has engaged with the NSWPF to address the concerns outlined in this submission and that the proposed mitigation measures are collectively inadequate to address its legitimate concerns. Nonetheless, NSWPF is willing to engage further with the Applicant and DPE regarding all matters in this letter.

Please do not hesitate to contact us directly if you wish to discuss any of the above issues in more detail.



Rod Smith
Assistant Commissioner
Commander Police Property Group
27/01/2023