

3 October 2023

Our Ref 22-048

Director – Industry Assessments
Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta, NSW 2150

Attention: Thomas Bertwistle

Town Planning Submission

SSD-55522478 – Multi-level Warehouse Development
6 Grand Avenue, Rosehill

1. Introduction

This submission has been prepared by Knight Frank Town Planning on behalf of George Weston Foods (GWF) in response to the Department of Planning and Environment's exhibition of a state significant development application at 6 Grand Avenue, Rosehill for a multi-level warehouse.

GWF is one of Australia and New Zealand's largest food manufacturers, employing 6,000 people across 40 sites. Its product range is diverse, including Tip Top, Abbotts Village Bakery, Yumi's, and more. We thank the Department for the opportunity to comment on the exhibition and look forward to further future engagement.

2. The Site and Context

GWF is the landowner of 15 Grand Avenue, Camellia, which is currently utilised for the production of yeast exported overseas as well as the production of vinegar & margarine production as operated by Mauri Yeast Australia Pty Ltd. Their operation involves heavy and light vehicle movements shifting materials and finished product including specialised application flours, yeasts, grains, bread and cake pre-mixes and improvers. There is an estimated 40 – 50 B-Double truck movements per day to service the site with circa 30 staff onsite. Importantly the site is divided by the now disused Sandown freight line with GWF trucks and operational vehicles relying on access across the freight line.

Important context to consider when assessing the application is the preferred route for Parramatta Light Rail Stage 2, being along the now disused freight line and which will therefore continue to divide our client's land. Publicly available material suggests the light rail will run every 7.5 minutes on weekdays between the hours of 7am and 7pm.

For these reasons, the operation of the light rail will have a significant impact on the efficient operation of our client's land and is a key consideration when considering matters of traffic impacts.

Our client has every intention of continuing their operation on the site and will therefore be impacted by both the eventual operation of the light rail and intensification of development in the surrounding area including the subject development. The GWF site is located directly to the north of the subject site, separated by Grand Avenue. Both sites are shown below in **Figure 1**.

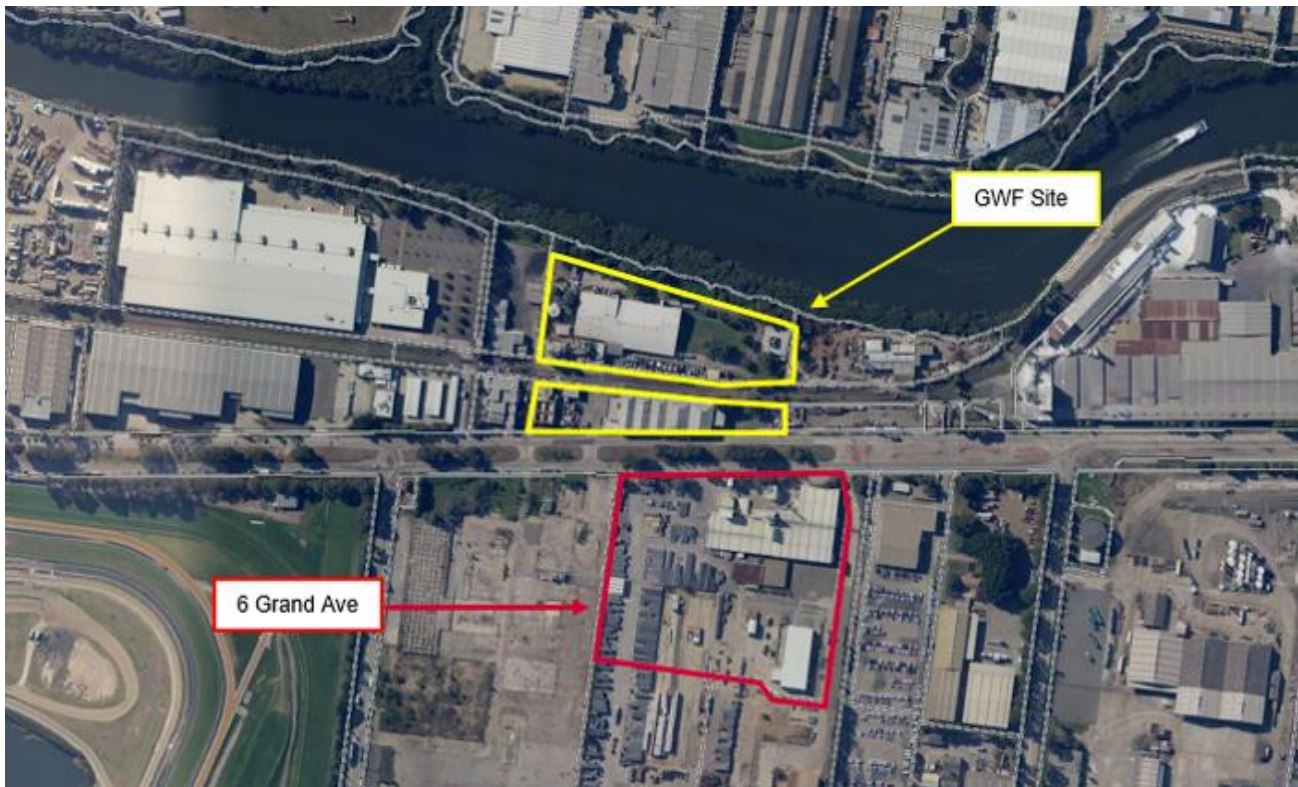


Figure 1 – Aerial image of subject site (red) and GWF site (yellow). Source: SIX Maps.

3. Response to Exhibited Development

Access and Queueing

Four access points are proposed as part of the subject development, all of which are on Grand Avenue. While the Transport Management and Accessibility Plan suggests there is sufficient access to the site, it is unclear whether the impacts including queuing along Grand Avenue have been fully considered. The AM and PM peak hour traffic generation are 128 and 121 vehicles per hour respectively for commercial vehicles. Total daily trips for the site are estimated to increase from 336 to 1,221 movements, which represents a significant increase.

It is understood that the majority of light vehicles and all heavy vehicles will access the development site by way of Grand Ave, performing a U-turn manoeuvre towards the eastern end of the GWF site. This substantive increase in movements at this location will significantly impact the ongoing operation of our client's site particularly with regard to servicing and queueing. This will be exacerbated by the Parramatta Light Rail Stage 2 corridor which will intersect the GWF site and cause frequent interruptions to its operations, as internal access within the site will be disrupted by services.

From the documentation submitted with the application it is our view that insufficient consideration has been given to the impact of the development on the GWF site with regard to queuing and particularly in the context of the eventual operation of the light rail. We reiterate that our client has every intention of continuing the current operation of the site, that the onus is on the applicant to satisfy the relevant statutory considerations and the key issues listed in the Planning Secretary's Environmental Assessment Requirements.

Service Bays

Further to the matter of the site being adequately serviced, only 48 service bays are proposed as part of the development whereas 56 are required as detailed in the Traffic and Transport Technical Implementation Report prepared by Arcadis in support of the *Camellia-Rosehill Place Strategy*. The Transport Management and Accessibility Plan (TMAP) does not provide a robust justification of this variation. The shortfall in service bays will contribute further to queuing and traffic impacts to neighbouring sites. We query this discrepancy and raise the need for adequate service bays to be provided in support of the development.

Parking

The proposed development will provide for 209 carparking spaces, which the supporting documentation has detailed as meeting the *Camellia-Rosehill Place Strategy* carparking requirement of 1 space per 200m² of GFA. The TMAP then refers to a separate *Parramatta DCP 2011* car parking rate of 1 space per 70m² of GFA. We have been unable to find this reference in Council's DCP and query the origin of this rate. More importantly, while the TMAP acknowledges there are differing rates that would seem to apply to the redevelopment of the site there is no comparative analysis of the requirements and why a lesser rate has been adopted and considered appropriate for the development.

Furthermore, and in addition to the consideration of numerical car parking rates, we note that there is estimated to be up to 450 staff on site with a peak of 225 staff at any one time. Table 31 from the TMAP suggests that the majority of employees (86%) will drive to work (either car or truck) as their normal mode of transport, whereas public transport and carpooling represents only 10% of travel modes. It is unclear to what extent the proponent has considered the changeover in shifts given the significant staffing numbers and what impact this may have on the demand for on-site parking.

Our principal concern is that sufficient car parking is provided to service the development with an appropriate tolerance to ensure there is no impact on street parking availability nor the safe and efficient operation of the local road network. From the documentation submitted, it is our view that the proponent has not interrogated to a sufficient degree the car parking needs for what is a significant development and the impacts on the locality.

Road Upgrades to Grand Avenue

The submission suggests that no road upgrades are required despite the significant increase in traffic from heavy vehicles in the locality and particularly the U-turn manoeuvre at Grand Avenue in order to gain site access to the site.

For the reasons outlined in this submission, inadequate consideration has been given to the impact of the development on the operation of Grand Avenue at this location and particularly the impact on the operation of the GWF site. As such it is considered that insufficient consideration has been given to any necessary road upgrades that would be required to mitigate the impacts of the development.

Construction Traffic and Parking

Our client is concerned regarding the construction traffic and associated car parking during works and the impacts on the operation of their site. While it is acknowledged that a Preliminary Construction Traffic Management Plan has been prepared in support of the application by its nature it is preliminary. We would request that there is ongoing consultation and engagement with GWF when furthering this Plan and as there is more detail regarding the construction methodology.

4. Summary of Key Issues

We thank the Department for the opportunity to make a submission on behalf of GWF. In summary, we provide the following key issues and recommendations for Council's consideration:

- There will be unacceptable impacts on the current and future long term ongoing operation of our client's site. Insufficient consideration has been given to the future Parramatta Light Rail Stage 2 and the extent of queueing into Grand Ave;
- The adequacy of the number of service bays and car parking to adequately service the development again with consideration on the local road network and ongoing operations of my client;
- What upgrades are required to Grand Avenue to ensure that impacts to the GWF are appropriately mitigated;
- Construction traffic and parking during the demolition / construction phase and how it will be managed to mitigate the impacts on the operation of the GWF site;
- The documentation submitted with the application is not considered to have satisfactorily addressed the key issues listed in the Planning Secretary's Environmental Assessment Requirements as it relates to transport matters.

Should you have any further questions, please do not hesitate to contact the undersigned.

Yours sincerely,



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