



Camden Council

70 Central Avenue, Oran Park NSW 2570
PO Box 183, Camden 2570
Telephone: 02 4654 7777
Email: mail@camden.nsw.gov.au

DX 25807
ABN: 31 117 341 764
Fax: 02 4654 7829

RPRI

2 September 2016

Director – Social and Other Infrastructure Assessments
GPO Box 39
SYDNEY NSW 2001

Dear Sir,

RE: State Significant Development Application SSD 7387

**PROPERTY: A Gregory Hills Drive, Gledswood Hills
Lot: 845, DP: 1203105**

I refer to the above state significant development application (DA) currently being assessed by your department and thank you for the opportunity to comment.

Council officers have undertaken a review of the environmental impact statement (EIS) and supporting information. This submission details the findings of that review and lists a number of issues to be addressed.

Of note, as the public exhibition closes on Friday 2 September 2016, this submission has not been reported to Council for formal consideration and endorsement.

The DA proposes a staged development pursuant to Section 83B of the *Environmental Planning and Assessment Act 1979*. In this regard, only concept approval is sought for building footprints and envelopes, indicative uses, access, loading, landscaping and parking.

The submission is provided following an officer review of the overall development. It is acknowledged some issues will be more relevant to future DAs, however the information is provided at this time to clarify Council officer's position and to assist in the detailed design.

Urban Planning

1. The proposed development includes a significant variation to the maximum building height development standard that applies to the site. The merits of this variation and its impacts upon the surrounding area, in particular the impacts upon the residential properties to the east and south east, must be carefully assessed by the Department.
2. The proposed development's interface with adjacent land, in particular the residential properties to the east and south east, is of critical importance. These residential properties generally contain single storey detached dwellings and present a much lower density character than that of the adjacent B5 Business Development zone. The Department must carefully consider the appropriateness of the interface of the proposed





development with these properties, in respect the development's design and operations, and have regard to the existing low density residential character of the area.

3. The DA should be widely notified to property owners and occupiers in the surrounding area with particular regard to the residential properties to the east and south east.
4. Parts of lot 845, DP 1203105 are mapped as bush fire prone land. It would therefore appear the proposed development is Integrated Development, as it is defined as a special bush fire protection purpose and requires a Bush Fire Safety Authority pursuant to Section 100B of the *Rural Fires Act 1997* (Integrated development). Clarification from the NSW Rural Fire Service should be sought on this matter.
5. The proposed development appears to include the construction of a new stormwater drainage outlet within the adjacent riparian corridor. Any works within waterfront land must either be consistent with the Oran Park and Turner Road Waterfront Land Strategy 2009, or will require a Controlled Activity Approval from the Department of Primary Industries Water pursuant to the *Water Management Act 2000* (Nominated Integrated development).
6. The site is subject to an existing stormwater drainage easement that benefits Council. This easement is proposed to be relocated to facilitate the construction of the proposed development. The proposed relocation of Council's drainage easement must be negotiated separately with Council.
7. A landscaped buffer with a minimum width of 2m must be provided along the site's frontage adjacent to the riparian corridor.
8. Indicative details/perspectives of the proposed development's presentation to the adjacent riparian corridor and land to the south/south west should be provided to understand the visual impacts from those elevations.
9. Consideration should be given to the location of future signage for the proposed development. Signage zones should be identified as part of the proposal with their overall placement integrated in the overall design.
10. All lighting must comply with AS4282 and AS1158.
11. All glazing used externally must not exceed 20% reflectivity.
12. All required roof mounted equipment should be integrated into the overall design of the proposed development to ensure it is neither visually dominant nor prominent.
13. The detailed design of all future buildings should be consistent with the Turner Road Development Control Plan 2007.





Traffic

1. The intersection analysis appears to be inconsistent with previous applications, which indicated the intersection of Gregory Hills Drive/The Hermitage Way and Donovan Boulevard has some movements operating at a level of service F. The additional traffic from this development would significantly affect the operation of this intersection. A peer review of the modelling should be undertaken to ensure the intersection can accommodate the traffic generated by this development.
2. The surrounding road network is currently under construction and should be completed prior to any of the proposed development becoming operational.
3. The number of proposed access points appears excessive and may create confusion and potential conflict for motorists. Rationalisation of the access points should be considered.
4. The proposed access off The Hermitage Way should be physically limited to left in/left out only.
5. No heavy vehicle access is permitted to/from the site from/to The Hermitage Way as outlined in the Turner Road Development Control Plan 2007.
6. As the proposed accesses will be controlled by boom gates, an analysis of queue lengths during peak arrival times needs to be provided to ensure the queue lengths can be accommodated without spilling onto the road network. The traffic report states this will be undertaken in the future, however this needs to be undertaken now as the outcome of this assessment may result in the scale of the development being too large for this site if queueing cannot be accommodated within the site.
7. Details on the entry system should be provided, as the traffic report states this is dependent on advances in technology.
8. Further details on loading and servicing are required, including how many vehicles are expected per day and the sizes of those vehicles. The detail provided indicates 12.5m vehicles are to service the site. Is this adequate or will larger vehicles be required? No dimensions of any loading bays have been provided. A loading/service management plan should be prepared to ensure vehicles are not waiting on public roads in order to access the site.
9. The number of accessible car parking spaces required should be in accordance with Building Code of Australia.
10. As the proposed development will be constructed in stages, it is essential the number of car parking spaces required for each stage be provided as each stage is developed.
11. The recommendation of a travel choice strategy is not supported by Council officers. There is no access to Gledswood Hills by mass public transit and there is no plan at this time to construct a rail link to Gledswood Hills. The bus services in this area are not substantial at this time, so the limited amount of available public transport results in the higher dependency on private cars.





12. Turning path assessments of car park areas should be undertaken as part of this application as this could affect the layout of the site and the number of parking spaces provided.
13. The queue length of the right turn out of The Hermitage Way with the development is 92.2m however the length of the bay is only 45m. The right turn bay should be extended to accommodate the aforementioned queue length as it would also affect through traffic by blocking the through lane.
14. The traffic report does not analyse any impact on the intersections to the east of the development, and this needs to be considered.
15. The intersection of Gregory Hills Drive and Camden Valley Way has been modelled using three through lanes in each direction. There is no indication if this will be constructed by the time this development is complete. Modelling should be provided based on the current road network without presuming upgrades have/will occur.
16. The driveways, car parking spaces, traffic aisles and internal roads including ramps and loading areas must be designed in accordance with the current AS 2890 parts 1 and 2.

Flooding/Engineering

1. The site map and building plans should be compared to the South Creek tributary through the site in order to assess the flood affectation of the proposed development. All of the proposed development must be above the Probable Maximum Flood (PMF) level as required by Council's Flood Risk Management Policy. This includes access to the proposed basement.
2. The entire development, including all stormwater management systems, must be designed in accordance with the Council's Flood Risk Management Policy, the NSW Floodplain Development Manual 2005 and Council's Engineering Specifications.
3. Council officers disagree with the following statement in the EIS:
 - The EIS states that "as per council requirements a minimum freeboard of 300mm is required above the 100 year ARI flood level for all habitable floor levels. Further to this, advice was received from Council in response to the initial SEARS application stating that the site was to have a minimum freeboard of 2.3m above the riparian corridor."

Hospitals need to be above the PMF. I note that in accordance with the matrix of Council's Flood Risk Management Policy, hospitals, being critical infrastructure, are an unsuitable land use for flood prone land.

In addition, the Stormwater Management and Servicing Report (May 2016) includes Appendix B of the Flood Assessment Report prepared by Mott MacDonald (not the full report). It shows HEC-RAS cross sections only for the 1% Annual Exceedance Probability (AEP) level but does not provide the PMF level.





4. A suitable pump out system for the basement car park must be provided.
5. The applicant may consider an alternative OSD basin as the proposed underground tank being approximately 20m x 35m over a two way road, as scaled off from the submitted plans, could be difficult and impractical to construct. An alternative could be an above ground basin.
6. The decommissioning and re-alignment of Council's existing stormwater drainage easement needs to be designed so that there is no reduction or adverse impacts to the pre-development conditions.

Environmental and Public Health

1. As a basement car park is proposed further salinity investigation must be undertaken to the depth proposed by the development and if required appropriate mitigation requirements identified.
2. The acoustic report submitted is considered inadequate as it fails to assess the following:
 - noise from mechanical plant to be installed associated with the premises;
 - noise from the multi-level car park;
 - cumulative noise from the open car park and the multi-level car park;
 - noise from loading docks;
 - Council officers questions the stated 66 vehicles using The Hermitage Way in the morning AM peak time in 2026 as this seems very low;
 - the assessment of noise from the car park has only been based on 50% use of the open car park. Council officers consider this to be an underestimate;
 - regarding the sleep disturbance criteria emergence test, Council officers do not agree with the two-step process where minimum internal noise levels below 50-55dB(A) are unlikely to awaken people. Council only accepts the L1- background +15dB(A); and
 - a construction noise management plan should be provided.
3. Will the facility use a supply of water, other than from Sydney Water mains, which may include but is not limited to:
 - rainwater tanks;
 - stormwater harvesting systems;
 - water treatment systems; and/or
 - groundwater.

If any of the above is to be incorporated, a risk assessment must be undertaken in accordance with the Australian Guidelines for Water Recycling: Managing Health and Environmental Risk (Phase 1 & 2).

4. Trade waste agreements will need to be obtained in accordance with Sydney Water requirements.





Pre-treatments may need to be installed in accordance with Sydney Water requirements.

5. Environmental Protection Authority (EPA) licenses may be required for the handling and disposal of clinical/special waste.
6. A waste management plan must be submitted in accordance with the *NSW Health Waste Management guidelines*.
7. It is acknowledged a development of this size will require water cooling systems (cooling towers) to be installed. The design of the buildings will need to include where are they to be located and how many are proposed. Installation and operation of cooling towers must comply with the requirements of the *Public Health Act 2010* and Regulation 2012 and are required to be inspected by Council.
8. All warm water systems (thermostatic mixing valves) must be installed and operated in accordance with the *Public Health Act 2010*, Regulation 2012 and NSW Health requirements (warm water systems are regulated by NSW Health). Notification is to be provided to NSW Health of any thermostatic mixing valves being installed.
9. Any pool provided as part of a hospital is defined as a public pool under the *Public Health Act 2010*. Operation of public pools, including hydrotherapy pools, must comply with the requirements of the *Public Health Act 2010* and Regulation 2012 and be inspected by Council.
10. The *Public Health Act 2010* defines holding rooms and mortuaries as:
 - a "holding room" means a room that includes refrigerated body storage facilities for at least 2 adult bodies but does not include a body preparation room; and
 - a "mortuary" means premises that are used, or intended to be used, for the preparation or storage of bodies as part of the arrangements for their burial or cremation, but does not include any premises (such as a hospital) in which bodies may be temporarily stored pending their transfer to a mortuary.

Any area defined as a holding room or mortuary must comply with the requirements of the *Public Health Act 2010* and Regulation 2012 and be inspected by Council.

11. Any food supplied to patients under a food safety program and not considered to be retail sale will be regulated by the NSW Food Authority.

Any food supplied that is not under the food safety program and is considered to be retail sale will be regulated by either the New South Wales Food Authority or Council in accordance with the Food Regulation Partnership.

12. The fit out of food premises shall comply with *Food Act 2003*, AS 4674 and AS 1668 1 and 2.





13. Any area where skin penetration procedures are carried out and not undertaken by, or under the direct supervision of a health practitioner, is to comply with the requirements of the *Public Health Act 2010* and Regulation 2012 and be inspected by Council.
14. Any area where beauty treatments are carried out and not undertaken by, or under the direct supervision of a health practitioner, is to comply with requirements of the *Local Government Act 1993* and the Local Government (General) Regulation 2005 and be inspected by Council.
15. Any procedures carried out by a health practitioner, or under the direct supervision of a health practitioner would not be regulated under the *Public Health Act 2010*. All health practitioners are registered with Australian Health Practitioner Regulation Agency. Acupuncturists are registered with Chinese Medicine Board.
16. Devices that use or emit radiation and/or lasers may require EPA licenses.

Ecological

1. The DA approved vegetation management plan (VMP) for the riparian corridor is dated 24 April 2012 and was approved by DA 277/2012.

It is noted a construction certificate related to DA 277/2012 appears to have acknowledged a revised VMP dated 13 February 2015. This revised VMP modified the treatment for part of the riparian corridor.

The EIS refers to a further revised VMP dated 6 November 2015 and states that this VMP was approved by a further construction certificate related to DA 277/2012. Council officers do not agree with this statement in that it does not appear that any construction certificate has been approved further revising the VMP.

Council officers reiterate the DA approved VMP for the riparian corridor remains the VMP dated 25 April 2012 approved by DA 277/2012.

The bush fire report submitted with the EIS needs to reflect the approved VMP for the riparian corridor which would appear to require asset protection zones on adjoining land including this site.

Any modifications to the VMP that applies to the riparian corridor should be assessed by Council via a Section 96 Modification application.

Waste Management

1. All waste management will need to comply with the *Protection of the Environment (Operations) Act 1997*, the Waste Regulation and the Work Health and Safety Act.
2. The draft waste management plan (WMP) must provide additional detail for the construction WMP.





3. The ongoing WMP will need to be accompanied by plans showing waste storage locations within the site. The ongoing WMP should also detail the movement of bins from storage areas to collection points, whether whole waste receptacles will be removed and replaced (for hazardous wastes this will be the case), who will be responsible for this (ancillary staff, nursing staff, etc.) and how access to areas for hazardous waste storage will be managed/restricted.
4. It is recommended that you consult with the NSW EPA, Safe Work Australia and NSW Health to seek advice on the above matters.

Social Planning

1. Appropriate and adequate seating should be provided in outdoor areas and pick up zones.
2. Provision must be made for drop off and pick up zones and adequate signage for these zones must be provided. This should include provision for any anticipated community transport buses and specialist day surgery patients' commuter buses.

Section 94 Contributions

1. Lot 845, DP 1203105 is a residue lot created out of the subdivision Development Consent 997/2014.
2. The land subject to this development is on proposed lot 846 in stage 4 of Development Consent 997/2014. Section 94 contributions are to be paid prior to the issue of a subdivision certificate in accordance with Condition 5.0(15) of Development Consent 997/2014.
3. All Section 94 contributions for the land must be paid to Council in accordance with Condition 5.0(15) of Development Consent 997/2014 prior to the construction of any part of the proposed development.

Should you have any enquiries in relation to this matter, please do not hesitate to contact Ryan Pritchard, Executive Planner, on (02) 4654 7715.

Yours sincerely,

Mr R Pritchard
EXECUTIVE PLANNER
(Planning and Environmental Services)

