

From: John Goodall
To: Ingrid Berzins
Cc: Ambrose Hallinan (Armidale Council)
Subject: Council response to Notice of Exhibition - UNE Wright Block, Armidale (SSO 9613)
Date: Thursday, 19 December 2019 5:10:54 PM
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Hi Ingrid,

I refer to the Departments e-mail of 19 November 2019 in regards to the above matter and thank you for providing Council with an opportunity to comment on the proposed UNE Wright Block development.

Following a preliminary review of the EIS submitted for the proposal, I would like to provide the following comments for the Departments consideration.

1. Traffic Study

It's not clear if assessment of on street parking was part of the review or not. The study seems to focus on the site and internal UNE roads and makes no reference to Handel Street. Handel Street has been a long running parking issue with clashes between residents and UNE parking. This development is an opportunity to alleviate that by provision of sufficient parking on site. They note compliance with the DCP by adding 188 spaces for the new 342 beds. It is considered that the Applicant has not fully considered the parking demands in place now and the impact of the development and ideally the number of spaces on-site should be increased so that not only is the future demand addressed but the legacy issues addressed. The car park design has a lot of medians which is unclear as to their purpose and it would seem there are areas where the parking areas could be extended.

The report notes at 6.3 the intention to review car park pricing as a means of seemingly encouraging use of public transport. This will only encourage parking in the street. Green plans and the like are good intention, but the reality in rural areas is the inability to sustain viable public transport, which needs to be recognised. The survey shows 90% or so drive. 342 beds added 188 spaces????

2. Stormwater

The approach to Water Sensitive Urban Design WSUD is supported but the Applicant will need to look at the long term viability. They are using multiple bio retention devices which on drawing C261 references planting to bio remediate. Will the plants survive with our dry intermittent rain event, cold winter climate? We are currently experiencing drought conditions which will presumably break at some point but would appear we are moving to a lessor rainfall climate.

The detention basis detail on C261 needs to note the HDPE liners to be sealed to form a water tight liner. Risk saturation of car park subgrade if not which will reduce life of the road pavement.

In general they appear to have considered the site in isolation with consideration of the catchment area around. They have provided detention on site so arguably it should not impact or stormwater systems they are connecting too. It is considered that an assessment needs to be undertaken to consider any mitigation measures that may be needed for the frequent events and the 1 in 100. The land is not flood prone as stated but drowning the outlets of stormwater pipe systems will have an impact on the drainage system. They need to account for these issues.

Given the current drought conditions being experienced in the Armidale Region and forecasts of long drier weather patterns being more common place, the capture and retention of rainwater on site is encouraged by Council and should be integrated into the design to improve water saving initiatives with the installation of sufficiently sized water collection tanks for the development which should be connected to facilities such as toilets, gardens etc.

3. Utilities and Developer Servicing Charges

The development proposes an additional 342 beds on the campus spread across 3 separate accommodation buildings.

The increase in accommodation numbers will place additional demands on Council's water and sewer infrastructure, particularly given that each room is effectively self contained.

As such, and as per section 306 of the *Water Management Act 2000* it is requested that Developer Servicing Plan (DSP) charges be applied to the development in accordance with Council's Policy.

4. Proposed Development & Planning matters

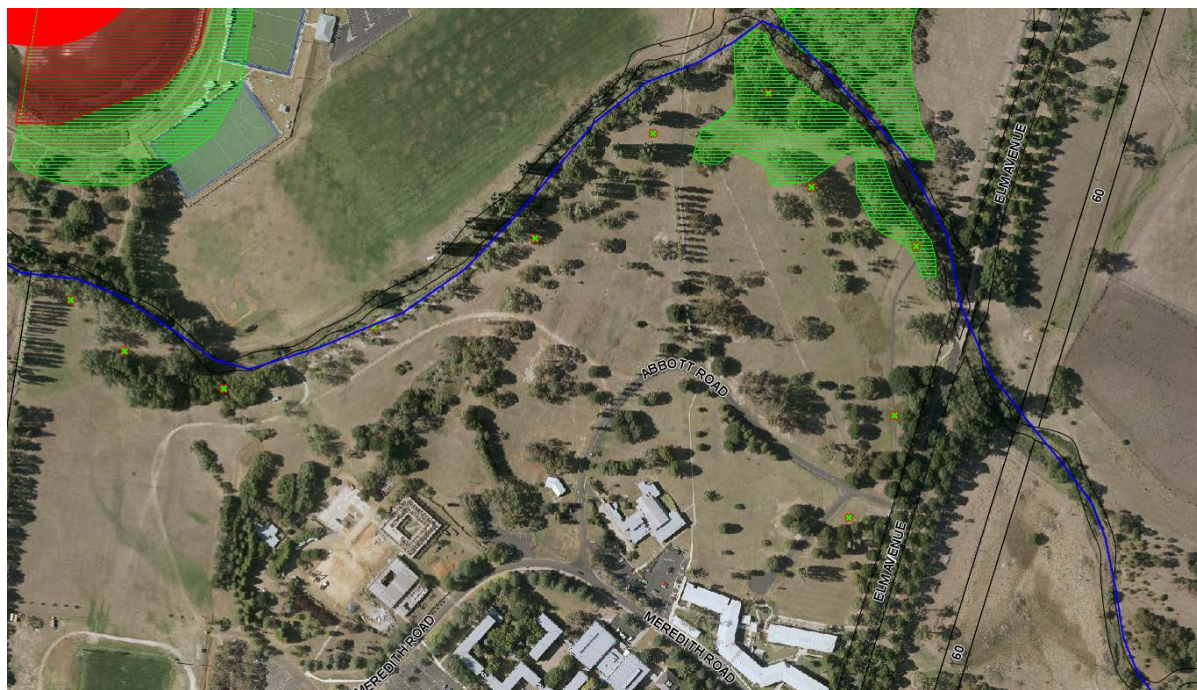
It is acknowledged that the proposal is to demolish the Wright Centre. This is considered disappointing from an ESD principle and Council would encourage the retention of this building if at all possible. In this regard, it is advised that Council undertook a preliminary DA meeting with UNE approximately 10 years ago to discuss the refurbishment and reuse of this building which was considered as viable at that time.

2.5.5 of the EIS correctly identifies Trevenna as being listed as being both a local and state heritage item, but has not identified that Booloominbah is also of State significance. Whilst it is not considered that the proposed development would adversely impact on this Item, this should be corrected in the documentation.

Some of the documentation references Clause 5.9 of ADLEP 2012 which was repealed following the gazettal of the Veg SEPP.

The BDAR undertaken for the development has advised that the subject development area does not contain potential Koala habitat. Whilst this may be so, Council would like to advise that the UNE campus contains areas of both potential and core koala habitat with many sightings of koalas within the campus, refer aerial photo below identifying sightings of koalas on the southern part of the campus, shown with a green cross. In this regard, it is strongly recommended that any consent should include a condition requiring induction of workers on site which should advise them of the presence of koalas on site and that all care should be taken during construction works to mitigate vehicle strikes. It is also recommended that a pre-clearing plan be developed prior to works commencing which should include a pre clearing survey of all vegetation to be removed by a suitable qualified ecologist who should also be onsite during the felling of the trees to ensure that no native fauna are present during this work.

Under Council's current s7.12 Contributions Plan, a 1% levy would apply and would be based on the development value. It is acknowledged that under section 7.19 of the EIS that the Applicant has suggested that the levy does not apply to proposals involving affordable housing. Whilst there are exemptions under the Plan for affordable housing Council does not consider that this proposal constitutes affordable housing for the purposes of the Affordable Housing SEPP and as such any exemption would not apply in this instance.



5- Additional applications required to be submitted

The following additional applications will need to be lodged with Council and approval obtained if consent is granted for the development:

- Trade Waste application
- Plumbing and Drainage (PDP)

Should you have any further enquiries please let me know.

Regards

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