

File Ref: SSD-10468

7 December 2020

Department of Planning, Industry & Environment Locked Bag 5022 Parramatta NSW 2124 **ATTN: Patrick Copas** Via email Patrick.Copas@planning.nsw.gov.au

Dear Mr Copas,

Inner West Council response: SSD-10468 – Warehouse and Customer Fulfilment Centre, Marrickville

Property: 74 Edinburgh Road, Marrickville

Thank you for the opportunity to comment on the proposed Warehouse and Customer Fulfilment Centre in Edinburgh Road. Council has also undertaken consultation with the applicant for this proposal and provided advice as to the design and constraints of the site directly to Woolworths. Council has reviewed the Environmental Impact Statement (EIS) for the project and makes the following comments:

Flooding

The subject site is identified as being located within flood prone land. The following considerations with regard to flooding should be taken into account in the detailed assessment of the development:

- i. The Flood Management Report has determined that the 1 in 100-year flood level applicable to the site is 4.81m AHD. As the flood depths post development are below/ less than 300mm in accordance with Council's Flood Management DCP CI. 2.22.5, 300mm of freeboard is required. Therefore, the plans should be amended to increase the minimum floor levels of the proposed development to 5.11m AHD;
- ii The improvement post development in flood depths is achieved by collecting the flood waters by large pit inlets and diverting them to an underground flood detention of 1200m³ volume equal to the existing site's above ground 1% AEP flood storage. No information has been provided on the design of these inlet structures or if any blockage factors have been applied to the modelling. It is Council's experience that "grate only" inlet structures block readily and do not achieve their design capacity. The inlet structures should incorporate kerb inlet, or "letter box" type inlet structures that are less prone to blockage with best practice blockage factors applied. Details of an overland flow path should also be provided in case of failure of the system.
- iii To better understand the potential consequence of failure, and to better inform the amount of blockage factors to apply, and verify the acceptance of a reduced freeboard



(of 300mm) the Flood Management Report should also include a post development flood scenario (change in flood depth map) with total blockage of the inlet structures.

iv. A post development PMF change in flood depth map should also be provided as adjacent redevelopment sites (for example Marrickville Metro) have produced Flood Emergency Response Plans based on existing PMF levels and an assessment needs to be made if the change in PMF levels post development is of any consequence.

Stormwater

The following considerations with regard to stormwater should be taken into account in the detailed assessment of the development:

- A Council Stormwater pipe drains through the site to the existing Sydney Water Channel. This pipe has not been detailed on any of the submitted plans and it appears that it will be built over which is not acceptable and contrary to Councils DCP 2.25 (Control C31). Council's stormwater asset shall not be built out but be suitably relocated away from the proposed building;
- ii Similarly, Sydney Water's stormwater infrastructure is also proposed to be built over, contrary to their guidelines. The stormwater plans even detail columns within the location of the stormwater channel. It is recommended that the applicant approach Sydney Water regarding their requirements with regard to the Stormwater Channel.

<u>Traffic</u>

The following considerations with regard to traffic should be taken into account in the detailed assessment of the development:

- i. Vehicular access and associated vehicle standing areas shall be designed in accordance with Australian Standard AS 2890.1-2004, AS2890.2-2002, AS2890.6-and Part 2.10 of Marrickville Development Control 2011;
- ii The Traffic and Access Report has not adequately assessed the effect of cumulative traffic impacts from the adjacent developments. Table 3.1 of the report submitted only applies the proposed development traffic to the existing traffic. No additional future traffic from other developments has been included. The proposal should incorporate traffic generation from the current "Part 3A" redevelopment project of the Marrickville Metro in their calculations. An amended traffic report incorporating a revised traffic assessment incorporating future traffic from other developments should be submitted.
- iii. The Traffic Signals design shall be amended to include bicycle lanterns;
- iv. Although an off-road shared pedestrian/ cycle path has been shown on the plans it is not clear if it has been designed to be a minimum width of 3 metres; and
- v. Road widening in Sydney Steel Road should be provided and be detailed on the plans to allow for the shared pedestrian/ cycle path is per the previous proposal below.

Edinburgh Road

A review of the provided architectural plans notes minimal ground floor streetscape activation to Edinburgh Road, with most of this frontage dominated by carparking. It is recommended



that the ground floor Edinburgh Road frontage be amended to incorporate additional activation through additional active ground floor uses which "wrap" the parking.

Sydney Metro Site

The site is located directly opposite a substantial parcel of land, currently being utilised for the construction of the Sydney Metro Line. The future potential re-development of the land currently utilised by Sydney Metro should be taken into account during the course of assessment for the current application. In particular matters such as driveway locations, truck turning bays, window, lighting locations, pedestrian accessibility/ safety and width of Sydney Steel Road should all be considered.

Acoustic

The proposal seeks consent for 24-hour operation 7 days a week and is located within close proximity of sensitive residential receivers. The potential acoustic impacts from the proposed operations needs to be closely assessed and controlled as part of the current application to ensure minimal impacts for the locality and community. In particular concerns regarding truck movements to and from the site during the night should be reviewed and measures to mitigate noise emissions from trucks must be incorporated into any consent. Acoustic measures should incorporate both management plans and physical treatments and any physical measures should be properly architecturally integrated into the fabric of the building.

If you need any further information in relation to the above response please contact Council's Senior Planner Conor Wilson on 02 9392 5997 or email conor.wilson@innerwest.nsw.gov.au.

Yours faithfully

Luke Murtas Manager Development Assessment