



8 December 2020

Ms Candice Pon
Department of Planning, Industry and Environment
Locked Box 5022
PARRAMATTA NSW 2124

Our Ref: 5/2020/PLP
Your Ref: SSD-10472

Dear Ms Pon,

Comments on the Expansion of the Museum Discovery Centre (SSD-10472)

Thank you for the opportunity to provide comments on the State Significant Development relating to the expansion of the existing Museum Discovery Centre at 2 Green Road and 172 Showground Road, Castle Hill.

As you are aware, a planning proposal for the subject site was gazetted on 13 November 2020. On 25 August 2020 Council determined to make the plan and The Hills LEP 2019 (Amendment No 19) was subsequently notified on the NSW Legislation website (Notification No. 669), as attached. The amendment sought to facilitate the expansion of the Museum Discovery Centre as follows:

	Previous LEP 2019 controls (Prior to Gazettal)	Planning Proposal (Gazetted)
Zone	<ul style="list-style-type: none"> ▪ Part R2 Low Density Residential ▪ Part SP2 Infrastructure (Classified Road) 	<ul style="list-style-type: none"> ▪ Part R2 Low Density Residential ▪ Part SP2 Infrastructure (Information and Education Facility) ▪ Part SP2 Infrastructure (Classified Road)
Height	10m	Part 10m and part 15m
Minimum Lot Size	450m ²	No change
Floor Space Ratio	Not applicable	No change

Table 1
The Hills LEP 2019 (Amendment No. 19)

Council's primary concerns are summarised below:

▪ **Access, Traffic and Parking**

The supporting Traffic Impact Assessment (TIA) anticipates the proposed development will generate an additional 45 daily peak trips. Concern is raised with the cumulative traffic impacts at the intersection of Green Road/Showground Road/Victoria Avenue. Confirmation from Transport for NSW regarding the status of the future road widening scheme at this intersection is requested.

The supporting Acoustic Report identifies evening and night truck noise emissions will exceed the criteria of 43dBA and 38dBA respectively when entering and exiting the northern loading dock. This may result in detrimental noise impacts to residential properties on Peppertree Place and Sunderland Avenue. It is noted that noise mitigation recommendations included in Section 7.4.2 of the Acoustic report is considered appropriate, given the small to medium size vehicles, relatively infrequent delivery times and their minimal maneuvering and idling outside the loading dock.

Whilst the supporting TIA states that the 38 informal car parking spaces on the TAFE site have never been required to be utilised to accommodate their parking needs, concern is raised with the TAFE campus' future parking needs as required by the potential future increase in staff and student numbers. In this regard, whilst the EIS and the Construction Management Plan discuss impacts during construction and operation phases, the TAFE's potential for future expansion has not been addressed, as required by the SEARs. Further, additional staff and students may require the continual provision of the 38 informal parking spaces.

Notwithstanding the above, the EIS indicates that the 38 informal car parking spaces would be relocated elsewhere throughout the TAFE site to satisfy Condition 2 of the consent for DA 1674/2007/HA. However, no plans have been submitted to identify the location of these parking spaces, nor has this been addressed in the supporting TIA. Clarification is sought on this discrepancy and as to whether the relocated parking will remain sealed or unsealed.

In addition, further clarification on appropriate signage locations and distances between the subject site and proximity to public transport stops is required. It is recommended that this be specified in the final Architectural Design Report.

- **Flooding, Drainage and Stormwater**

Site surface runoff currently flows via internal flow paths to the western boundary low point then discharges to Council's Sunderland Avenue piped drainage system. Stormwater runoff associated with the new building will be managed and conveyed via an underground tank. Noting the proposed car parking layout is pending approval, stormwater runoff quantity and quality measures have only been prepared for Building J. A drainage system design will need to be prepared and submitted for the relocated car park.

It is noted that the Stormwater Management Report has used Version 4 of the Upper Parramatta River Catchment Trust for the on-site stormwater detention (OSD), being a dual orifice design. However, Section 2.4.1 of the report refers to site storage requirement (SSR) and permissible site discharge (PSD) from Version 3 which requires a high early discharge (HED) as opposed to dual orifice as shown on plan. Justification is required for where the additional SSR and PSD of 260m³/ha and 25L/s/ha is derived from (as identified in the OSD calculation sheet), as no allowance for dual outlet design within the Hawkesbury Catchment is provided for within Version 4 of the Upper Parramatta River Catchment Trust Handbook.

Accordingly, the proposed OSD tank has been designed with two separate PSD & SSR parameters along with twin basin outlets (refer to Plan No DA4.01, Rev 2) instead of Council's required single outlet as per Hawkesbury River Catchments OSD requirements. In accordance with Table 4.14 of Council's design guidelines for subdivision/developments, the OSD tank is to be amended and designed considering one SSR & PSD parameter with a single basin outlet connected to downstream drainage system.

Further, consideration should be given to the following key OSD tank hydraulic design criteria in the overall design of the tank for satisfactory performance:

- Downstream tail water levels against proposed tank hydraulic performance to be demonstrated during frequent and major storm events;
- OSD tank volume calculation table should be presented in the OSD detail design plans; and
- The proposed overland flowpath from the OSD tank ought to be identified towards downstream formal drainage system and to be clearly shown in the design plan as per Trust OSD handbook for implementation.

Stormwater quality treatment device has been incorporated inside the basin based upon MUSIC model outcomes. It is acknowledged that the MUSIC model analysis utilises BOM Sydney Station (No 66062) rainfall record. Council recommends using Parramatta North (Mason Drive) Station (No 66124), 6 minutes rainfall with modelling period of 10 year duration, given its closer proximity to Council's boundary. This will also ensure greater consistency throughout the Shire.

▪ **Biodiversity and Landscaping**

It is noted that the proposed removal of 337 non-remnant trees onsite are native to the Cumberland Plain Woodland, whereby the supporting Biodiversity Development Assessment Report (BDAR) allocated the plantation to the Plant Community Type 849, which is classified as Cumberland Plain Woodland (a critically endangered ecological community (CEEC) under the Biodiversity Conservation Act 2016 and Environment Protection Biodiversity Conservation Act 1999). Although planted, the vegetation has a low to moderate level of conservation significance as it may contribute to the overall recovery and persistence of this community and assist with creating vegetated corridors in the landscape and provide habitat for threatened mobile fauna species.

Having regard to the above, three development concept options were considered regarding the strategic needs and objectives of the proposed development, however, such alternatives had not been identified for the relating planning proposal. It is acknowledged that section 7.1.2 of the BDAR considers Option B and raises concerns for the reduction in car parking areas to justify its preference for the proposed development concept. The viability of Option B and alternative ideas of car parking locations or efficiency of the current car parking area design have not been adequately explored or justified within the BDAR. As such, it is considered that avoidance and mitigation requirements of the Biodiversity Assessment Method have not yet been met. The applicant should further investigate options for how the building design and parking requirements of the proposed development can be met onsite to avoid the need to remove 337 trees of this CEEC.

The recommendations for removal and retention of trees within the building footprints are acknowledged. However, the report will need to be amended to clearly detail the level of encroachment into the tree protection zones of trees to be removed or retained, in accordance with the Australian Standard (AS 4970-2009). Recommendations of trees to be retained or removed are to be reconsidered on the basis of the above impact assessment.

Clarification is sought for discrepancy between reports regarding tree removal, particularly where some trees are marked for removal in the Architectural Plans but have been identified to be retained and protected in the Arborist Report.

The proposed density of 40 plants per hectare is considered insufficient in a landscaping setting, particularly as the site is not considered so large that firm densities cannot be provided at this time. Accordingly, planted shrubs should be roughly 1 plant per 2m², with ground covers planted around 4 to 8 plants per 1m². Further, planting for shrub and ground cover should be extended into areas between the existing dam and Green Road. Whilst the benefits of tube stocks are understood, larger pot sizes will ensure greater resilience in a variety of circumstances and require less maintenance.

It is considered that that trees replaced off site will require a mix of stock sizes, with 50% (at minimum) to be planted using 75L pot size. Whilst the Tree Replacement Strategy' proposed 12 month maintenance period is considered acceptable for larger pot sizes (75L), a minimum three year maintenance period is recommend for tube stocks.

The revised location of the new substation (from the related planning proposal) is noted and it is recommended that any visible service provision is to adequately screened and be identified and documented accordingly.

Council officers' response to the identified site opportunities for tree replacement planting are provided in *Attachment B* of this letter. For all identified opportunity sites, any existing APZs will need to be maintained. It is recommended that once a site and planting location has been endorsed by Council (as subject to further discussions), community consultation be undertaken prior to any planting at all sites mentioned in *Attachment B*. For sites like Heritage Park and Fred Caterson Reserve, consultation with user and interest groups would also be required. The location of replanting opportunity sites should be identified on a map; and once following further discussions with Council, the quantity, species and pot sizes can be clarified. Further, approval of all relevant land owners is required prior to the submission of the strategy to the consent authority.

Should you require further clarification on the above, please contact me on 9843 0334. Alternatively, feel free to contact Gideon Tam, Town Planner on 9843 0188 on matters relating to the planning proposal.

Yours faithfully

A handwritten signature in black ink, appearing to read 'C. Dugan', with a large, sweeping flourish at the end.

Cynthia Dugan
PRINCIPAL COORDINATOR DEVELOPMENT ASSESSMENT



New South Wales

The Hills Local Environmental Plan 2019 (Amendment No 19)

under the

Environmental Planning and Assessment Act 1979

The following local environmental plan is made by the local plan-making authority under the *Environmental Planning and Assessment Act 1979*.

**MICHAEL EDGAR, GENERAL MANAGER
THE HILLS SHIRE COUNCIL**
As delegate for the local plan-making authority

The Hills Local Environmental Plan 2019 (Amendment No 19)

under the

Environmental Planning and Assessment Act 1979

1 Name of Plan

This Plan is *The Hills Local Environmental Plan 2019 (Amendment No 19)*.

2 Commencement

This Plan commences on the day on which it is published on the NSW legislation website.

3 Land to which Plan applies

This Plan applies to land at 2 Green Road, Castle Hill, being part of Lot 102, DP 1130271.

4 Maps

The maps adopted by *The Hills Local Environmental Plan 2019* are amended or replaced, as the case requires, by the maps approved by the local plan-making authority on the making of this Plan.

Attachment B – Tree Replacement Opportunity Sites

Identified tree replacement opportunities sites throughout the Shire are as follows:

- **William Harvey Reserve**

An opportunity exists between Watergum Close and Greensborough Avenue for planting. The area containing the playground should be retained as is to allow the continued availability of a small area of open space for recreational activities. Any planting will need to be in accordance with the site specific Plan of Management and current Flora and Fauna study.

- **Caddies Creek Reserve**

A large section of Caddies Creek Reserve (particularly the clear section along Paramount Crescent (near Radisson Place) is Sydney Water land. Approval for planting on Sydney Water land will need to be sought from them. The section of Caddies Creek Reserve along Radisson Place is Council owned, but relatively well planted out and likely won't offer a suitable planting option.

- **Bellamy Farm Reserve**

This reserve has significant vegetation as well as areas of open space. The Reserve is identified for future recreational embellishment and the planting of additional trees may compromise these plans. Some opportunities may exist within the vegetated areas.

- **Castle Hill Heritage Park**

An opportunity may exist for planting at Heritage Park, noting the popularity of the open space areas for recreational use by the community as well as community events. Any planting will need to be in accordance with the site specific Plan of Management and Conservation Management Plan.

- **Fred Caterson Reserve**

Limited opportunities exist at Fred Caterson Reserve. A Draft Master Plan is currently being finalised (not yet adopted by Council) which identifies possible recreational embellishments, as well as conservation and provision of additional vegetation. Could be considered following adoption of the Master Plan by Council.

- **MacKillop Drive Reserve**

Opportunity exists for further planting within the reserve and along the creek corridor.

In addition to the abovementioned, other possible sites suitable for tree planting are as follows:

- **Centenary of ANZAC Reserve**

Located in close proximity to the Museum and TAFE, additional planting could be supported along the Green Road perimeter.

- **Rutherford Avenue Reserve**

Construction of the reserve has recently been completed. Opportunities exist for plantings along the creekline.

- **Arnold Avenue Reserve**

Opportunities exist around the perimeters of the Reserve.

- **Creek Corridors**

Opportunities may exist along several creek corridors including Caddies Creek, Cattai Creek and Strangers Creek, noting however, that large sections are in Sydney Water or other ownership and appropriate land owner approvals would need to be sought.