

Submissions Report

6 Grand Avenue, Rosehill

SSD-55522478

6 Grand Avenue, Rosehill

PREPARED FOR

Hale Capital Development Management

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MECONE.COM.AU

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A	21 December 2023	For lodgement	Gannon Cuneo	
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* This document is for discussion purposes only unless signed and dated by the persons identified.
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1 Introduction

This Submissions Report relates to the proposed warehouse and distribution centre at 6 Grand, Avenue, Rosehill (the site) and has been prepared on behalf of Hale Capital Management Pty Ltd (the Applicant). This Submissions Report has been prepared to address the matters raised as part of the second round of submissions/comments received from the Department of Planning, Housing and Infrastructure (DPHI), City of Parramatta Council, Transport for NSW, Heritage NSW and the Biodiversity, Conservation and Science Group (BCS). The State Significant Development Application (SSDA) was lodged with the DPE in August 2023 (SSD-55522478).

The SSDA was placed on public exhibition for 28 days between 5 September and 3 October 2023. Responses were received from seven (7) agencies and 1 objector. A Submissions Report prepared by Mecone (Revision A, dated 21 December 2023) was submitted to DPHI on 21 December 2023 providing a response to each of the submissions/comments received and outlined the minor amendments and refinements to the proposal to address the matters raised. This Submissions Report provides a further response to the comments provided by the agencies and Council as part of a second round of comments. This report has been prepared in accordance with *the DPE State Significant Development Guidelines – Preparing a Submissions Report* (Appendix C) July 2021.

2 Project Description

The proposed development is for a multi-storey, multi-unit warehouse and distribution centre development on the site. The amended Architectural Plans prepared for the development are provided in **Appendix A** of this submission. The key components of the development comprise the following:

- Demolition of the existing structures and improvements on the site,
- Site preparation and earthworks,
- Construction of a two-storey warehouse and distribution centre comprising 10 tenancies, each with an area for warehousing and ancillary office space resulting in the following total floor areas for the development,
 - 36,870m² of floor area for warehousing, and
 - 3,607m² of floor area for office space,
- Vehicular access and parking including ramp access to level one suitable for heavy articulated vehicles, on-site parking spaces for passenger vehicles including a mezzanine parking level and parking at ground level, and separate ingress/egress points for vehicles to Grand Avenue,
- Tree removal and landscaping including a 20-metre landscaped setback to Grand Avenue.

The warehouses will operate 24 hours a day, 7 days a week.

2.1 Supporting Documents

The following documents have been prepared to support the additional information and amendments in response to the further submissions received.

TABLE 1 – SUMMARY OF AMENDED DOCUMENTS AND PLANS

Attachment	Document	Author
Appendix A	Architectural Plans	SBA Architects
Appendix B	Design Report	SBA Architects



Attachment	Document	Author
Appendix C	Landscape Report	Geoscapes
Appendix D	Traffic Letter	Ason
Appendix E	Visual Impact Assessment	Geoscapes
Appendix F	Civil Engineering Report incorporating Water Cycle Management Strategy	Costin Roe

3 Analysis of Submissions

The SSDA was publicly exhibited between 5 September and 3 October 2023. Following exhibition, there were seven (7) submissions received from public agencies and City of Parramatta Council. One submission was received from a nearby landowner being George Weston Foods (GWF) located at 15 Grand Avenue, Camellia. A response to the submissions received was provided in a Submissions Report prepared by Mecone (Revision A, dated 21 December 2023) which was submitted to DPHI on 21 December 2023. That report provided a response to each of the submissions/comments received and outlined the minor amendments and refinements to the proposal to address the matters raised.

This Submissions Report provides a response to each of the matters raised by the relevant agencies and Council in response to the submission of additional information and amendments provided with the initial Submissions Report. Submissions have been received from the following in response to the amended proposal:

- Transport for NSW,
- Biodiversity, Conservation and Science Group
- City of Parramatta Council,
- Heritage NSW and
- Department of Planning, Housing and Infrastructure (DPHI).

In addition to the above, a response was received from NSW State Emergency Services dated 22 January 2024 which was received following the first Submissions Report dated 21 December 2023. The response raises no objections to the proposal, but outlines some of the key considerations relating to emergency management. These are discussed further below, and the principles established by NSW SES will be complied with for emergency management on the site.

The issues raised in the submissions are summarised in Table 2 below.

TABLE 2 – SUMMARY OF ISSUES RAISED

Issue Raised		Summary
Transport and Traffic	Green Travel Plan	A Green Travel Plan should be provided to TfNSW prior to occupation of the development.
	Parramatta Light Rail Maintenance Facility Site Access	The splay of the westernmost driveway for the proposed development may impact access to the maintenance facility.



	Construction Traffic and Parking	A Construction Pedestrian and Traffic Management Plan should be prepared prior to the issue of any Construction Certificate or works commencing on site.
Environment	Flooding	A Flood Impact Risk Assessment is required. Water flow attenuation should be considered with regard to surcharge impacts in Grand Avenue. Increased floor levels should be considered.
Bulk and scale	Visual dominance	Visual impact/dominance from Rosehill Racecourse.
	Articulation	Articulation in the built form should be provided to minimise bulk and scale.
Landscaping	Green roof	Green roofs should be provided in accordance with the Camellia-Rosehill Place Strategy.
	Boundary landscaping	Landscaping should be provided along the western boundary to reduce visual impact.
Design	Façade	The ramp/access on the façade is too visually dominant.
Public Domain	Public Domain Alignment Drawing	A Public Domain Alignment Drawing should be provided.
Heritage	ACHAR	Draft conditions provided.

4 Actions taken since Exhibition

In response to the key issues raised within the submissions, minor design refinements and clarifications have been made to the proposed development since public exhibition. This section summarises the changes that have been made to the project since its public exhibition.

4.1 Engagement

Since exhibition and preparation of the previous Submissions Report, no further engagement or consultation has been undertaken. Advice and feedback on the amended design had been sought from DPHI prior to finalisation of the documentation submitted with this report, however no formal engagement/consultation has been undertaken with agencies, Council or the public. It is considered further engagement was not required in order to respond to the comments received from the relevant agencies, Council and DPHI.

4.2 Amendments to the Proposal

The table below summarises the minor changes made to the development since public exhibition. These refinements do not change what the application is seeking consent for, and are only minor changes to the design in response to submissions received. Therefore an amendment to the proposal is not required.

TABLE 3 – AMENDMENTS TO THE PROPOSAL



Component	Amendment
<i>Façade/Elevations</i>	Warehouse exterior walls to the east and west have been revised to include horizontal high contrast colour bandings and vertical dynamic elements, through the addition of glazed window strips with deep set framing and louvres.
<i>Landscaping</i>	The western driveway width has been reduced to accommodate an increased the landscape strip of 4.9m wide on the western boundary enabling extensive sections of deep soil planting. This permits additional planting, with large canopy trees are proposed.
<i>Public Domain</i>	Plans have been updated to demonstrate future public domain works can accommodate footpaths, driveway crossovers (proposed with the development), street trees and bus stops.
<i>Westernmost driveway</i>	The westernmost driveway adjoining the Parramatta Light Rail Maintenance Facility has been amended to ensure the splay is wholly located within the frontage of the subject site and the revised swept paths have been updated.

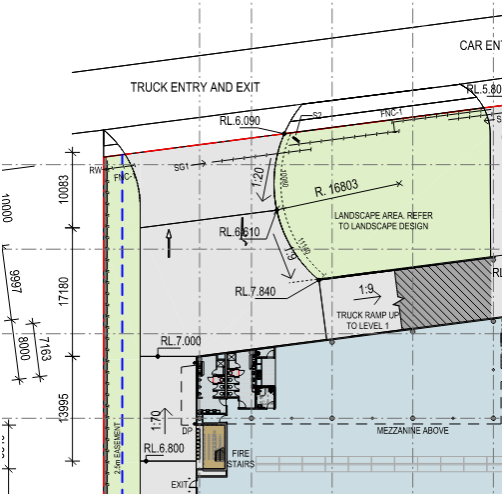
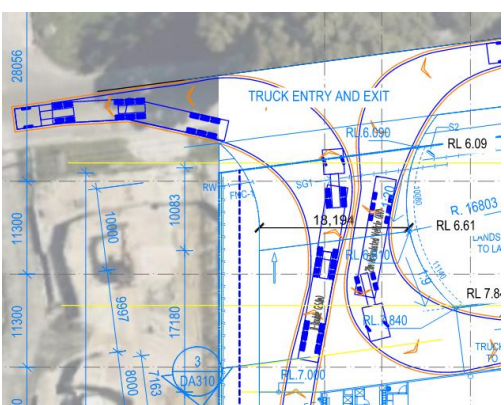


5 Response to Submissions

This section provides a detailed summary of the Applicant's response to the issues raised in submissions. The response has been structured to provide a response to each of the key issues raised by the relevant agencies and objector.

Table 4 below provides a response to each of the comments provided or issues raised by agencies.

TABLE 4 – RESPONSE TO AGENCY COMMENTS

Agency	Comment	Response/Action
Transport for NSW	Vehicular Ingress/Egress point: The proposed driveway splay on the westernmost access for vehicle egress may interfere with future Parramatta Light Rail Stage 2 construction access point. The Proponent is to reduce footprint of the driveway splay to limit potential impact of future PLR Stage 2 construction access.	The westernmost vehicular ingress/egress point on the site has been amended to ensure the driveway splay does not extend beyond the frontage of the subject site, and there are no works fronting the Parramatta Light Rail maintenance facility. An extract of the amended Architectural Plans is provided below.  The amended plans are also supported by swept paths prepared by Ason which verify the design of the splay is suitable and ensures no impact on the Parramatta Light Rail site. 



	Remediation System: Any excavations below the final ground level of the Parramatta Light Rail Stabling and Maintenance Facility (also known as the SaMF or 4 Grand Avenue, Camellia), including directional drilling and tunnelling works, have the potential to impact components of the SaMF remediation systems. No excavation works would be permitted, straddling the boundary of, or within, the SaMF boundary without an approved permit issued by the SaMF Operator and supported by a Construction Work Method (CWM) to ensure excavation does not extend to critical components of the SaMF remediation systems. Should excavations need to be undertaken past these limits, measures are to be outlined in the CWM to control excavation depth and position as directed by the SaMF Operator. There would be no liability to TfNSW or the SaMF Operator as a result of this requirement including no financial burden in reviewing future works under this Proposal.	Noted.
	TfNSW requests that a complete GTP is prepared and implemented once the occupants of the site are known. The full GTP should be submitted to TfNSW for review prior to occupation.	Noted. A Preliminary Green Travel Plan (GTP) has been provided within the TMAP Issue III and it is expected that the requirement of a detailed GTP would form a Condition of Consent upon of approval.
	Prior to the issue of any construction certificate or any preparatory, demolition or excavation works, whichever is the earlier, the applicant shall prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with TfNSW. The	Noted. A Preliminary Construction Traffic Management Plan has been provided within the TMAP Issue III, and it is expected that the requirement of a detailed Construction Pedestrian and Traffic Management Plan would form a Condition of Consent for issue of a Construction Certificate.



	CPTMP needs to specify matters including, but not limited to, the information contained within the TfNSW letter dated 25 January 2024.	
Biodiversity, Conservation and Science Group (BCS)	BCS does not agree with the statements made regarding the need or otherwise for a Flood Impact and Risk Assessment (FIRA) to be carried out. It is agreed that drainage was not included in the regional study and this may overestimate the degree of ponding shown on the flood mapping. Local drainage however only caters for minor events and some ponding on the existing site can still be expected in events greater than the pipe capacity. The development involves importation of significant fill, upgrade of internal piped drainage to a 1% capacity, which is to be connected to existing council systems of unknown capability, large buildings which obstruct flow and occupy the floodplain (defined as all land below the PMF level). The proponent has not demonstrated that this can be done without off site impacts. A FIRA is still required due to the anticipated flood impacts and the flood constraints associated with this development, particularly as there are existing off site flooding issues and significant change in land use is proposed. BCS recommends this matter be addressed prior to determination.	In response, Costin Roe have prepared an updated Civil Engineering Report incorporating Water Cycle Management Strategy to include the required Flood Impact and Risk Assessment. The FIRA includes an assessment of Northrop's Flood Behaviour Report, Part 2.4.2 'Water Management' in Parramatta DCP, and the Final DRAFT Flood Study Report for the Parramatta River prepared by Stantec. The report considers the impacts of runoff from the site and confirms there are no adverse impacts on surrounding properties impacts as a result of the development, and also considers the future impacts of climate change with consideration of rainfall and rising sea levels. With regard to flooding, the relevant assessments undertaken for the site and precinct have been reviewed against the proposal, and Costin Roe have modelled the 1% AEP and can confirm there is no adverse impact as a result of the development. The flooding, during the 1% AEP, within Grand Avenue is shown to have a hazard category of H1 near the proposed crossover points, which is considered "generally safe for people, vehicles and buildings". The flooding behaviour in Grand Avenue is associated with runoff within the local road network generated from the road network and surrounding areas, coupled with ponding at the road sag point to the west of the site. The modelling shows that runoff immediately in front of the site access point is a function of the runoff from the local catchment only (in the 1% AEP event) and that the influence of flows from the Parramatta River does not reach the site. With regard to site evacuation, a low-risk evacuation route is deemed available to the east/south-east of the development site and it is considered that the emergency management strategy is consistent with the requirements of the NSW SES. Parramatta River does not break its banks in any flood event up to (but not including the PMF), including the various climate change adaptation scenarios discussed in the report. As noted by BCS, the exclusion of local drainage in the Stantec regional flood model exacerbates the observed flooding on site. The Costin Roe modelling provisions for detailed site drainage as it discharges into Council stormwater drainage in both the pre- and post-



		development scenarios and demonstrates that the trunk drainage can sufficiently cater for the site catchment. Local ponding is still observed on site in the existing state where flooding exceeds the drainage capacity, however this is adequately addressed by low-volume storage in the proposed site's drainage network and sags with no observable affectation to neighbouring properties in the 1% AEP event. The information contained within the revised report by Costin Roe addresses the points raised by BCS and confirms there is no adverse impact on the site, adjoining properties or downstream catchment from a water management and flooding perspective.
	The need for on-site detention remains an issue for Council to determine however it is considered that connection of an efficient 1% AEP system within the site to a council drainage system without any attenuation of flow is likely to surcharge the Council system which may affect flood immunity of Grand Avenue.	Council has reviewed the proposal and raised no objections to the civil design for the development, which does not include provision of on-site detention. Costin Roe sought preliminary feedback from Council's Senior Catchment and Development Engineer, Paul Clark, and Senior Catchment Referral Engineer, Bishwa Mishra, prior to finalising the civil design for the development who confirmed that OSD is not a requirement if it can be demonstrated that OSD would exacerbate flooding in the river. Costin Roe have prepared a revised report which confirms and demonstrates that OSD is not required, which has been reviewed by Council who raise no objections to the proposed civil and stormwater design for the development. As noted by BCS, the need for on-site detention is a matter for consideration by Council and given Council are satisfied with the proposal, no further amendments or additional information is deemed necessary.
	Selection of floor levels higher than the minimum floor level specified by Council is also a matter for Council and the proponent. BCS's advice that larger flood events should be considered as a loss mitigation measure is based on recent experience of large economic losses in floods which exceeded the flood planning event and advice that rarer events are expected to become more frequent with climate change. The development involves significant investment and opportunities to manage current	The development has been designed with a particular focus on balancing the significant investment in development of the site, whilst ensuring the environmental impacts are minimised wherever possible. Whilst it is noted the site is subject to minor flooding, the built form and ancillary aspects of the development have considered the potential risk and incorporated the necessary requirements for protection of human life whilst mitigating or avoiding any unnecessary potential impacts. Areas surrounding the built form have retained the existing ground level wherever possible to minimise the impacts on adjoining sites, with the building floor intentionally designed to be above the 1% AEP flood level plus the required 0.5m freeboard associated with Parramatta River. It is also important to note that the site is not subject to flooding or overland flow from upstream catchments or otherwise. The chosen floor level allows for acceptable



	and future flood risk should be considered.	residual risk in accordance with NSW Floodplain Development Manual 2023. In addition to the above, assessment of the Draft Flood Assessment prepared by Stantec for City of Parramatta Council indicates that the site will maintain flood immunity in excess of 500mm freeboard to all modelled climate change scenarios. The Water Cycle Management Strategy for the proposed development has been amended as noted above to discuss the Stantec food model in relation to the proposed development in detail.
City of Parramatta Council	<u>Building Form</u> The height reduction of 1.5 metres is supported. However, as illustrated in the amended View Impact Analysis, the revised facade design for the eastern and western elevations fail to mitigate the bulk and scale of the construction adequately. Council emphasises that both the western and eastern facades will be highly visible from the potential new north-south streets in The Camellia Rosehill Place Strategy and surrounding existing street network. Owing to the facades' substantial length (138m) and height (23m), further fine-grained architectural articulation, such as variations in facade depths, colours, and materials, are required to break down the scale of the building and provide a more appropriate interface to the future streets. Council reiterates that the Camellia Rosehill Place Strategy recommends that "New developments will integrate with the public domain, with generous landscaping including green roofs to provide further buffers to heavy industry, providing amenity for new businesses and visitors." (p71). Given this, portions of the proposed roofs should be provided with on-structure planting, particularly along	Further amendments have been provided to the design of the built form to address Council's requirements, particularly the western and eastern facades of the building. The eastern and western facades now incorporate feature vertical windows to first floor warehouses in addition to the existing horizontal window strips to ground floor warehouses. This provides for greater natural lighting to the tenancies, with deep set metal framing assisting in passive solar shading. The spacing between the windows adds visual interest externally and assists in breaking down the overall length of the building, with the metal framing further providing a dynamic element through movement of solar shading across the day. Key consideration of each functional element has seen the offices strategically located across the building mass to ensure both operational efficiency as well as effective external façade articulation. These pods act as a transition between the streetscape and the warehouse blocks through variance in materiality and pattern elements, engaging site occupants and the general public. Amendments to the western driveway and landscape design also aim to assist with mitigating the bulk and scale of the development. The width of the landscaping strip along the western boundary has been increased from 2.5 metres to 4.9 metres to address the concerns raised by Council. The landscape strip now provides sufficient space for a range of trees proposed which are capable of reaching a height of up to 20 metres at maturity. The additional planting provides a substantial improvement to the treatment along the western boundary, with the landscaping softening the buildings appearance to the future residential development to the north west and Randwick Racecourse to the west. Refer to the updated VIA Report which contains the following images, demonstrating how these adopted measures have addressed the bulk and scale of the building.



	Grand Avenue, to soften the building's appearance at the interface with residential development to the north. While it's noted that some of the roofs provide translucent roof sheeting and solar panels as green infrastructure initiatives, there is ample space for on-structure planting. Council recommends that the building should provide a further 3m setback to the easements, this will allow for planting including canopy trees. The current reasoning that easements limit planting in the proposed setback is insufficient. Mature landscaping will reduce the visual impact of this development which exceeds the maximum building height and will be highly visible along the eastern and western boundaries.	 With regard to the on-structure planting, the environmental benefits are noted, however from their experience, our Landscape Architect (Geoscapes) have noted that this type of system is unsuitable and problematic for the proposed development. Typically, a green roof would be well suited on a residential or commercial type building due to their use and structure, but are not suited to the light weight structures found in industrial warehousing. A green roof on a warehouse would be difficult to maintain due to height and safety considerations, which is why there are no other warehouse buildings in the area with a green roof. In relation to the inclusion of green walls on the western facade similar concerns apply, with the westerly sun resulting in significant heating of building walls which in turn will make it difficult to establishing planting in the form of climbers, hence we have addressed this with the deep soil planting along the widened landscape strip. Furthermore, substantial sustainability benefits are achieved through the proposed use of the roof space for a PV solar system and translucent roof sheeting, with reduction in urban heat island effect considered through the use of 'Dover White' colourbond roofing material.
	<u>Public Domain</u> This development proposes the construction of multiple new crossovers which would impact on the existing public domain council assets like the kerb, gutter and grass verge. The existing street trees need to be accurately documented in Public	SBA and Geoscapes have reviewed Parramatta DCP and taken into consideration the location of a footpath and other infrastructure within the road reserve. A Street Tree and Section Plan prepared by Geoscapes (Drawing number SSD-08, revision H, dated 12/3/24) demonstrates how a future footpath within the road reserve and street trees between driveways could be accommodated. SBA have also considered this on drawing number 100, revision 13, dated 4/3/24 which also demonstrates the

	Domain Alignment Drawings. Any trees removed are to be offset with additional street tree planting. Alignment drawings are to include a new footpath along the front of the property. Additionally, Council expects that conditions are applied that any damage to the existing assets are to be made good in accordance with Council standards. The purpose of the submission of Public Domain alignment drawings is to demonstrate the layout considering the impact of the new crossovers on the existing trees and infrastructure.	potential location of the footpath adjacent to the property boundary, the verge, crossovers, and bus stop location.
Heritage NSW	Attachment A - Recommended draft conditions for Aboriginal cultural heritage Below are our recommended draft conditions for the protection of Aboriginal heritage and the implementation of an Aboriginal Cultural Heritage Management Plan. Aboriginal Heritage 1) All reasonable steps must be taken to avoid harm, modification, or other impact to Aboriginal objects except as authorised by this approval. 2) The Registered Aboriginal Parties must be kept informed about the SSD and continue to be provided with the opportunity to be consulted about the Aboriginal cultural heritage management requirements of the SSD. Aboriginal Cultural Heritage Management Plan 3) Prior to carrying out any ground surface disturbance	No objections are raised to the conditions provided by Heritage NSW.



	associated with the proposal, the Applicant must prepare an Aboriginal Cultural Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must: a) be prepared by suitably qualified and experienced persons; b) be prepared in consultation with Registered Aboriginal Parties and reviewed by Heritage NSW; c) include a description of the measures that would be implemented for: i) ongoing consultation with Registered Aboriginal Parties, including consultation regarding changes to the Aboriginal Cultural Heritage Management Plan; ii) a contingency plan and reporting procedure for the management of Unexpected Heritage Finds and Human Remains that is prepared in consultation with the Registered Aboriginal Parties and in accordance with the Heritage NSW guidelines and standards. The Unexpected Heritage Finds and Human Remains Procedure must be implemented for the duration of the project. iii) ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions. d) include requirements to undertake further Aboriginal cultural heritage assessment for any areas outside the current project footprint and/or where the extent of impacts may be increased during the final design	
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	and construction phases of the project.	
Department of Planning, Housing and Infrastructure	<u>Urban Design</u> The Department acknowledges the changes proposed to elevational treatment on the eastern side of the building and changes to building height. However, the Department continues to have concerns that the proposal will still have significant visual impact when viewed from Rosehill Gardens with this exacerbated by the proposal's lack of visual transition to the area's character to the west. The Department requests further consideration be given to this façade and additional articulation incorporated, including changes in materials and variations in façade depth.	As mentioned above, the western façade of the development has been amended to include additional features to mitigate the visual impact when viewed from Rosehill Racecourse. The elevation now incorporates vertical feature windows to first floor warehouses and horizontal window strips to ground floor warehouses. This provides for natural lighting to the tenancies, with deep set metal framing for passive solar shading. The spacing between the windows adds visual interest externally and assists in breaking down the overall length of the building, with the metal framing further providing a dynamic element through movement of solar shading across the day. The range of high-contrasting colour banding and materiality add to the variation in the appearance of the building. This is further supported by the increased width of the landscape strip on the western boundary to provide opportunity for large trees to further screen the built form and minimise bulk and scale once the trees reach maturity.
	While it is acknowledged that tree planting on the western boundary is restricted due to easements, an increase in the vegetation buffer to extend outside the easement would resolve this. The driveway between the western vegetation buffer and Warehouse 1/2 appears excessive for a one-way driveway (approx. 9.5 m). This would also assist in achieving greater canopy cover on site, in line with the place strategy, which the proposal has relied on as justification for increased height.	The width of the driveway at the western edge of the site has been reduced where possible to cater for an increase in the landscape area enabling deep soil planting of larger trees along this boundary. The extent of the widened landscape strip along the western boundary was limited to accommodate the swept paths for trucks coming down the southern ramp. The additional planting in this area provides for greater canopy cover across the site which is consistent with the vision and objectives of the Camellia Rosehill Place Strategy. The landscaping will further contribute to a reduced visual impact and improved overall outcome for the site.
	<u>Traffic</u> A review of the updated SIDRA modelling shows queue lengths of approximately 60 m in the PM future base case. A review of other traffic assessments in the peninsula have shown Grand Avenue as having existing	To address this raised concern, Ason have checked the 95th percentile queue on Grand Ave during AM and PM peak periods. The results are provided in the letter attached to this response in Appendix D prepared by Ason which outlines that the length of the queue could grow from about 60m to 100m when we switch from the average queue to the 95th percentile queue. However, this 100m queue is not expected to have any material impacts on the traffic at the upstream intersection of Grand Ave /



	queue lengths of over 100 m during in previous years. A review of aerial imagery also shoes queue lengths on Grand Avenue far longer than 60 m. While maximum queue lengths are largely considered to be standard in modelling, the traffic assessment uses the average queue length, which is likely the reason for reduced queue lengths. Please update the traffic assessment to consider the maximum queue length, including consideration of how increases in queue length may impact any lane blocking.	Colquhoun St, which is approximately 850m away, and would not have any lane blocking on Grand Ave. Therefore, it is not expected to have any adverse impacts within the surrounding road network by changing the queue length analysis methodology, and the results and conclusion of the traffic assessment would not have any difference from average queue length to 95th percentile queue length. The figure below shows the average queue lengths and the 95th percentile queue lengths at the intersection of Grand Ave / James Ruse Dr and the location of the upstream intersection.  Regarding the report of the average queue length instead of 95th percentile queue length for Grand Ave at the intersection of Grand Ave / James Ruse Dr, Ason adopts this methodology based on previous project experiences and advice from SIDRA Support. SIDRA suggest using the average queue length because it is usually more reliable. This reliability comes from the observation that average queue lengths occur more frequently than 95th percentile queue length, as Ason have a significantly larger dataset (sample size) to determine what the average queue is.
NSW State Emergency Services	SES recommend carefully considering the flood risk at the site, including isolation and inundation, noting that isolation and inundation occurs during frequent flooding (20% Annual Exceedance Probability (AEP)), with depths in excess of 1.5m during a Probable Maximum Flood (PMF) event.	A detailed flood assessment has been completed which identifies that while the site is within the floodplain, it is not significantly impacted by flooding in events up to the 1% AEP storm. Minor flooding is observed on the Grand Avenue frontage, which is noted to be low depth, low velocity, and of the H1 categorisation. As floodwater continues along Grand Avenue, it generally does not exceed the H2 categorisation at worst. As such, it is believed that the site is not isolated during frequent flood events and safe egress is available along the main road. It is agreed that the site is significantly inundated and isolated in the PMF event, but it should be noted that the entire region is similarly inundated, and egress is not possible via road anywhere. Safe refuge is available on the site's upper levels which is sited at RL14.60, well above the expected PMF flood level of RL7.80.

	SES recommend consideration is given to the proposed 'Fire Brigade Entry Route' to the western side of the site as this area of the site becomes inundated with Hazard Level 5 (H5) floodwater during a PMF event, increasing risk to life due to secondary risk such as fire or medical emergency during a flood event.	The Costin Roe flood assessment supports that the site is affected by flooding up to H5 hazard categorisation along the site boundary. However, it should be noted that this flooding extends along the entirety of Grand Avenue and the road is expected to be completely inundated. In this event, all land-based emergency vehicles will likely be unable to access site in any form.
	SES recommend further modelling be undertaken regarding the duration of isolation at the site to better understand the risk to life.	The completed flood assessment identifies that the site is not isolated due to flooding in events up to the 0.2% AEP storm. Flooding is observed in the Grand Avenue frontage, however this flooding is within the H1 hazard category and is safe to traverse.
	SES recommend seeking advice from the Department of Climate Change, Energy, the Environment and Water (DCCEEW) regarding the impact of the proposed development on flood behaviour for adjacent and downstream areas.	BCS/EHG have requested additional flood modelling to be undertaken in response to flooding observed on site in the Parramatta River regional flood study completed by Stantec. Costin Roe have completed a detailed flood study that confirms no adverse affectation on adjacent and downstream properties as a result of the proposed development.



6 Updated Justification of project

This section of the Submissions Report provides an updated evaluation of the social, environmental and economic impacts, including the principles of ecologically sustainable development. In addressing and responding to the submissions, no additional mitigation measures are proposed beyond those submitted as part of the EIS. As there are no substantial changes to the proposal, the justification of the project is largely consistent with that provided as part of the EIS.

6.1 Design of project

The development is for a warehouse and distribution centre facility at 6 Grand Avenue, Rosehill. The proposal includes the following:

- Demolition of the existing structures and improvements on the site. Hardstand areas and concrete slabs will be retained where possible as part of the remediation strategy,
- Site preparation and earthworks,
- Construction of a two-storey warehouse and distribution facility comprising 10 tenancies, each with an area for warehousing and ancillary office space resulting in the following total floor areas for the development,
 - Approximately 36,870m² of floor area for warehousing, and
 - Approximately 3,696m² of floor area for office space and lobby areas,
- Vehicular access and parking including ramp access to level one suitable for heavy articulated vehicles, on-site parking spaces for passenger vehicles, and separate ingress/egress points for vehicles to Grand Avenue,
- Tree removal and landscaping including a 20-metre landscaped setback to Grand Avenue.

6.2 Consistency with strategic context

The proposed development is suitable for the subject site and is located within the Camellia-Rosehill Precinct which is identified as part of the 20-year blueprint for redevelopment in accordance with the Camellia-Rosehill Place Strategy.

The detailed assessment of the proposal against relevant strategies has been addressed in Section 2.2 of the EIS submitted as part of the SSDA. The proposal contributes to the planning objectives outlined in the relevant district and region plans, and Parramatta Local Strategic Planning Statement.

6.3 Compliance relevant statutory provisions

The proposed development remains permissible with consent and generally meets the requirements of the relevant statutory planning controls with the exception of the building height. The proposal complies with the maximum floor space ratio and other statutory requirements as outlined in Parramatta LEP 2023. The detailed assessment of all relevant state and local environmental planning instruments are outlined in **Section 4** of the EIS submitted with the SSDA. The assessment concludes as following:

- The development has been addressed in accordance with the relevant objectives of the *Environmental Planning and Assessment Act 1979*.
- The EIS has been prepared in accordance with the issued SEARs required by Part 8 of the *Environmental Planning and Assessment Regulation 2021*.



- The proposal is consistent with the principles of ecological sustainable development specified in Clause 193 of the *Environmental Planning and Assessment Regulation 2021* and will support delivery of an ecologically sustainable development.
- This development is categorised as SSD under the Planning Systems SEPP 2021.
- The site is zoned E5 Heavy Industrial under the Parramatta LEP 2023, and the proposed development is permissible in the prescribed zone and is consistent with the zone objectives.
- The *Biodiversity Conservation Act 2016* has been considered and the application is accompanied by a BDAR Waiver accordingly.

6.4 Community views about the project

As identified in Tables 4 and 5 of this Submissions Report, the feedback received from agencies, Council and the objector has informed the amended plans and documents submitted. The proposed development as amended is considered to adequately address any concerns raised.

6.5 Economic, social, environmental and cumulative impacts

The following potential social, economic and environmental impacts remain as part of the amended proposed development.

Social impacts

- The proposed development includes opportunities for employment in close proximity to existing residential dwellings in Rosehill and Parramatta, and the future Camellia town centre.
- The proposed development contributes to employment diversity within the Camellia-Rosehill Precinct through provision of warehouses of varying scale and size.

Economic impacts

- The proposed development will provide significant benefits including jobs throughout construction and operations of the warehouses.
- The proposal will provide additional industrial floor space within close proximity to key transport corridors.
- Total economic (direct and indirect) activity of \$125,017,000.
- Generates 407 total jobs, years during construction.
- Generates 458 permanent jobs for a conventional warehouse, or 367 permanent jobs for a semi-automated warehouse, once operational.

Environmental impacts

- The proposed development will not have any adverse impacts to any ecological species, as identified by EHG in their submission. The BDAR Waiver dated 2 June 2023 confirms that “development is not likely to have any significant impact on biodiversity values and the application does not need to be accompanied by a BDAR”.

6.6 Compliance monitoring and communication

Compliance of the development with the key statutory controls and conditions of consent will be monitored and communicated with all project staff by the development and project managers. The various management and



mitigation measures outlined throughout the EIS ensure appropriate monitoring and communication is maintained throughout the construction and operational phases of the project.

6.7 Key uncertainties

The various components of the proposed development and the consultant reports provided to support this Submissions Report result in no uncertainties associated with the proposal.

6.8 Ecologically sustainable development

The proposed development is able to be undertaken in a manner that is consistent with the principles of ecologically sustainable development, as discussed in **Section 6.12** of the EIS.

7 Conclusion

This Submissions Report has addressed the submissions received in response to the public exhibition of SSD-55522478. The proposal as refined will result in high-quality development that achieves the original aims of the proposal while resulting in no unacceptable environmental impacts. The review of the submissions in response to the development, and preparation of amended documentation to support the proposed changes, confirms there are no additional mitigation measures or impacts identified.

Based on the supporting material provided in this Submissions Report in addition to the material provided in the original EIS, DPHI has now been provided with sufficient information and documentation to progress the assessment of SSD-55522478. We request that DPHI complete the assessment of the application and proceed to determination.



