

Submissions Report

6 Grand Avenue, Rosehill

SSD-55522478

6 Grand Avenue, Rosehill

PREPARED FOR

Hale Capital Development Management

DECEMBER 2023

MECONE.COM.AU

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REVISION	REVISION DATE	STATUS	AUTHORISED: NAME & SIGNATURE
A	21 December 2023	For lodgement	Gannon Cuneo 

* This document is for discussion purposes only unless signed and dated by the persons identified.
This document has been reviewed by the Project Director.

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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 by the Department of Planning, Environment (DPE), public agencies, Council, and the objector. 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. This Submissions 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 submissions received.

TABLE 1 – SUMMARY OF AMENDED DOCUMENTS AND PLANS

Attachment	Document	Author
<i>Appendix A</i>	Architectural Plans	SBA Architects
<i>Appendix B</i>	Design Report	SBA Architects
<i>Appendix C</i>	ACHAR with Appendices (Unredacted)	Artefact
<i>Appendix D</i>	Air Quality Impact Assessment	RWDI
<i>Appendix E</i>	Civil Report	Costin Roe
<i>Appendix E1</i>	Civil Response Letter	Costin Roe



Attachment	Document	Author
Appendix F	CPTED Report	Mecone
Appendix G	Landscape Report	Geoscapes
Appendix H	Noise and Vibration Impact Assessment	RWDI
Appendix I	Transport Management and Accessibility Plan	Ason
Appendix J	Visual Impact Assessment	Geoscapes

3 Analysis of Submissions

The SSDA was publicly exhibited between 5 September and 3 October 2023. 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.

Submissions from Transport for NSW, City of Parramatta Council, NSW Fire and Rescue, Sydney Water, Heritage NSW, the Environment and Heritage Group (EHG), Endeavour Energy, NSW Ports and Jemena provided comments on the proposal. Ampol were contacted to make a submission, however they confirmed they would not be making a submission. NSW Fire and Rescue, Endeavour Energy, NSW Ports and Jemena did not raise any objections or provide any further commentary.

As noted above, GWF registered their response as an objection to the proposal. The concerns raised primarily relate to the light rail, traffic and parking. These are discussed further in Table 4.

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

TABLE 2 – SUMMARY OF ISSUES RAISED

Issue Raised		Summary
Transport and Traffic	Modelling	Incorrect data illustrating traffic modelling and movements
	Access	The number of vehicular accesses to the site is excessive The intensification of the development on the site will have an impact on the operation at 15 Grand Ave
	Parking	The car and bicycle parking provided does not comply with Parramatta DCP 2011 Mode share and travel figures should consider staff movements for shift workers Concern there will be a reliance on street parking
	Green Travel Plan	A Green Travel Plan should be provided.
	Light Rail	The operation of the light rail will have a significant impact on the operation at 15 Grand Ave.



	Service Bays	Insufficient number of service bays proposed
	Road Upgrades	Inadequate consideration has been given to the impact on Grand Avenue
	Construction Traffic and Parking	Concern is raised and consultation is requested regarding construction traffic and parking
Environment	Flooding	The site is flood affected but the mapping shows otherwise The Costin Roe Report has inconsistent statements The proposal is for an intensification of development on the site and flooding above the PMF must be considered Impacts of filling has not been considered Evacuation via Grand Ave is not feasible as it is also inundated in flood Shelter in place is required to be supported by structural requirements Incorrect calculations for sediment control have been provided Consultation with SES is required
Building Height	Visual dominance	Visual impact/dominance from Rosehill Racecourse
	Impacts	Impacts on future residential properties to the north
	Landscaping	Landscaping should be implemented to buffer
	Articulation	Articulation in the built form should be provided to minimise bulk and scale
	Precedence	The approved development at 8 Grand Ave does not establish precedence
	Excessive floor to ceiling height	The internal heights are excessive in accommodating vehicles and other activities
Landscaping	Green roof	Green roofs should be provided in accordance with the Camellia-Rosehill Place Strategy
Signage		Signage on the western elevation is excessive.
Design	Façade	The ramp/access on the façade is too visually dominant
CPTED		Consideration should be given to CPTED
Public Domain	Public Domain Alignment Drawing	A Public Domain Alignment Drawing should be provided.



Noise	24/7 operation	It is noted future tenants will be required to submit acoustic assessments if required to address noise across Parramatta River
Waste	Construction Environment Management Plan	A CEMP should be prepared
Heritage	ACHAR	The information in the ACHAR requires updating.

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 as noted in the table above, consultation has been undertaken with EHG in order to address the concerns raised in their submission. Whilst a final position was not confirmed by EHG, the amendments and additional information provided in this response are considered to satisfactorily address the comments provided. Refer to Appendix E1 attached to this response for a summary of the correspondence between Costin Roe and EHG.

Additional engagement has also been undertaken with State Emergency Services (SES), with an email issued to SES on 19 December 2023 advising them of the proposal and inviting them to review the strategy for flood emergency as outlined in the Civil Engineering Report prepared by Costin Roe. A response was received from SES on the same day confirming receipt of the referral, stating that the referral will be assessed and if deemed applicable, a response will be forthcoming in due course.

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</i>	Warehouse exterior walls is revised to include an additional colour, prominently designed and spread across the sides of the facility. The horizontal window strip is revised to include metal louvres.
<i>Elevations</i>	Within the hardstand breezeway, the window strips is removed from the ground mezzanine level. Metal panel finishes is now applied on the ground and ground mezzanine level walls.



Component	Amendment
<i>Landscape Area</i>	Landscape areas is increased at the west and east boundaries of the site, increasing the total landscape area.
<i>Bicycle Parking</i>	Additional bicycle parking is added to the main entry points of the facility.
<i>Site Conditions information</i>	Information regarding the existing sewer vent is added.
<i>Substation Location</i>	The substation location is relocated to avoid conflict with the existing sewer
<i>Planters</i>	Planters are added throughout the site and all office outdoor areas for increased vegetation.
<i>Carparking Quantity</i>	Additional carparking is provided to comply with the new Parramatta Council DCP Rates
<i>Building Height</i>	The overall building height is reduced by 1.5m
<i>Roof Pitches</i>	The roof pitches throughout the facility are changed to 2.5-degrees
<i>Metal Slat Screen Detail</i>	The metal-slat screen is revised to have more frequent slats, reducing the overall openness and visibility through into the carparking area.
<i>Site Fencing</i>	The east boundary fence type is changed to palisade for better street frontage appearance.
<i>Building Signage</i>	The Building Numbering and Tenant Signage on the warehouse walls is removed. The wayfinding signage along Grand Ave is relocated closer to the street and the fencing wraps around the signs for legibility.



5 Response to Submissions

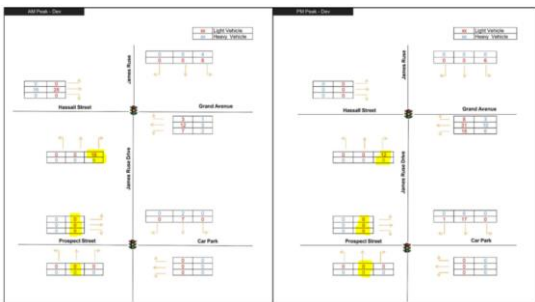
This section provides a detailed summary of the Applicant's response to the issues raised in submissions. The response has been structured to provide a response to each of the key issues raised by the relevant agencies and objector.

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	1. Table 23 of Section 6.4 of the submitted traffic report incorrectly compares inbound and outbound light and heavy vehicle trips in the PM peak, representing the incorrect percentage proportions. Total percentages for heavy vehicle trips should be constituted by heavy and light vehicle inbound, separate to heavy and light vehicle outbound trips.	In the previous TMAP Issue II, Table 23 represents the total site in and out percentage. The previous Table 23 has been updated with correct trip distribution which was sourced from ABS Journey to Work DZN – 114920002, refer to Table 26 within the TMAP Issue III attached to this response.
	2. Submitted SIDRA modelling outputs indicate there will be an additional 80m queue in the northbound direction in the PM peak for James Ruse Drive/Prospect Street intersection. TfNSW is requesting clarification of this calculation, noting it does not appear to be deduced from expected trip distribution. If correct, this is a significant additional daily number of trips proposed to the existing network, which is likely to adversely affect network performance of the state classified road network. An amended TIA should be submitted, proposing traffic upgrades to mitigate any traffic impacts and achieve acceptable intersection performance. Also, Figure 22 of development traffic volumes in the submitted traffic report indicate zero additional northbound vehicles at the James Ruse Drive/Prospect Street intersection, suggesting possible miscalibration.	The SIDRA modelling has been updated for the 2026 Project Case scenario at the James Ruse Drive / Prospect Street intersection. Growth rates of 2% for James Ruse Drive and 1% for Prospect Street & Grand Avenue have been applied to the 2026 Future Base model. The trip distribution for the development site was adopted from Journey to Work data. The assumed SIDRA volumes are correct. However, previous Figure 22, which represents James Ruse Drive / Prospect Street development trips, has been updated, refer to Figure 19 within this TMAP Issue III. During the PM peak period, the queue length at James Ruse Drive / Prospect Street intersection was observed as 187m for the Existing Base Case scenario and 223m for the 2026 Future Base scenario, representing an increase of 36m. The updated 2026 Project Case (volume) would increase the northbound queue by an additional 45m. Moreover, the James Ruse Drive / Prospect intersection would operate at LoS C, and the queue will not interfere with or block any other



		intersection, as the next major intersection is approximately 900m away. Therefore, the impact of development trips on the intersection is minimal.
	3. Figure 22 of Section 6.8 in submitted traffic report indicates northbound motorists on James Ruse Drive will turn right into Grand Avenue, without passing through Prospect Street/James Ruse Drive intersection. In this case, the flow diagram does not represent continuous vehicular movement, as indicated by the image below.  TfNSW will require an amended TIA prior to further assessment of this application. Upon receipt of the above requested information, TfNSW will undertake assessment and provide comments and requirements accordingly.	Previous Figure 22 has been updated, refer to Figure 19 within TMAP Issue III attached to this response at Appendix I.
City of Parramatta Council	Building Height The development is considered too visually dominant, primarily from Rosehill Racecourse (which is a prominent tourist destination in the City of Parramatta) and any future residential zones north of this site on Grand Ave. The design should be amended to explore reducing the overall height and increasing landscape buffering and building articulation.	Due to site constraints and easements (B & D as noted in the survey plan provided in Attachment 3 of our SSDA submission) no large tree planting can occur along the western boundary, however shrubs have been accommodated for where possible. All building facades have been amended to include more visual articulation, this is evident within the updated photomontages of the VIA. Comments regarding potential visual impacts from future residential zones have been addressed in Section 5.4 of the updated VIA in Appendix J attached to this response to submissions. To specifically address this concern, the overall height of the development has been reduced by 1.5 metres resulting in a maximum building height of 23m. The height is considered suitable given the anticipated building heights in the

		locality under the Camellia Rosehill Place Strategy, and the nature of the development particularly when considered against the approved building heights immediately adjoining the site.
	The approved building at 8 Grand Avenue (approved under DA/751/2019/C) is not considered to be a precedent as it does not have a prominent and active street frontage impacting the public domain and the building has a smaller side elevation.	Whilst it is noted 8 Grand Avenue is considered a battle axe lot, the approved development is considered to establish a precedence. The height of the building is not only visible from various areas of Grand Avenue, but also from other areas in the locality as identified in the Visual Impact Assessment prepared by Geoscapes (report reference 191108_DA_RPT_VIA01). Whilst the VIA prepared for that DA is based on a building with a height of up to 18.5 metres, that development has since been modified to propose a building height of 25.8 metres. The height of the proposed development is therefore consistent with that approved. Notwithstanding the precedence established by the adjoining approved development, the proposed development is considered to be substantiated on its own merit. The visual impact of the proposed development is considered to provide a positive impact on the streetscape due to the substantially increased setback from the front boundary when compared with the existing development on the site and others along Grand Avenue, and the building has been architecturally designed to ensure the development presents as a high-quality industrial development. On this basis, the visual impact of the development and the precedence established by other developments on a broader basis should be considered, rather than the impact from Grand Avenue alone. The visual impact of the proposed development has adequately been considered with the additional design amendments in response to submissions and the request for



		information from the Department of Planning and Environment.
	This development's floor to ceiling heights, which range from 10.8-13.7m are excessive for the function of an industrial warehouse. The mezzanine, currently functioning as a vehicular carpark could have a reduced height of 3m to accommodate the office and vehicles. The levels with hardstand areas for HRVs should only require a 4.5m minimum clearance to manoeuvre.	The proposed development will be a state-of-the-art industrial offering in a land constrained market with a severe lack of premium stock. Fundamental to this is the inclusion of high clearance storage in line with super-prime industrial assets with heights of 10.8m at a minimum and up to 13.7m at the ridge line. The clearance height is critical in ensuring that operational efficiency is maximised and consequently will attract premium businesses to occupy the space, contributing to the local precinct and economy. Similarly, within the hardstand areas, it is important that forklifts and other operational equipment can operate freely within a clearance height greater than 4.5m. Additionally, provisions have been made for the significant structural zones of two-level warehousing including sizable steel members and concrete slabs to support the loading capacity requirements on level one. Notwithstanding the above, the overall height of the building has been reduced so far as possible to ensure functionality is maintained whilst ensuring the concerns raised are addressed.
	In addition, the side elevations for this development are long and unarticulated. With a side elevation of 132m this building should be further articulated, with changes to both building design and colours/materials.	All building facades have been amended to include more visual articulation, including incorporation of colour variation to reduce the appearance of bulk and scale of the built form. In addition, the overall height of the building has been reduced by 1.5m to a maximum height of 23m. The design amendments and incorporation of colours and finishes improve the articulation of the elevations and this is evident within the updated photomontages of the VIA.



	The Camellia Rosehill Place Strategy recommends that, <i>“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.”</i> (p71). As such, the design should explore green infrastructure such as green roofs and planters to the outdoor areas or walls.	The front setback is generous at 20m wide which allows for the retention of several existing trees and proposed new trees, shrubs and groundcover planting. This will provide visual screening of the development particularly to the north. Further planters have been added to the level 1 mezzanine for offices 6 to 10. Refer to Landscape Plan SSD-07. The roof of the proposed development is already effectively utilised for sustainability initiatives including solar panels and translucent roof sheeting to provide natural light to the level one tenancies. The incorporation of green roofs is therefore not feasible.
	Additionally, a larger landscape buffer to the Eastern and Western boundary of 3m should be explored to screen the development and ensure the development can be integrated into the vision of the Place Strategy which has streets running either side of the site.	As noted above, there are various easements preventing further larger screen planting to the western and eastern boundaries. On the east these include easements A, C1 and E1.
	<u>Signage</u> The signage on the western and eastern facades is considered unnecessary and not visible for users of the warehouse or the street. As such it functions more as advertising than business identification signage. These should be removed, particularly the western signs as they would be highly visible from the Rosehill Racecourse and make the development more visually intrusive from that viewpoint.	The signage on the eastern and western elevations has been removed as illustrated on the amended Architectural Plans. The previously proposed signs have been replaced with scaled back signs to identify the tenancies, reducing the visibility of the signage from Rosehill Racecourse whilst still allowing for identification of the relevant tenancy.
	<u>Vehicle Entrances</u> The proposal includes 7 ‘lanes’ of vehicular crossovers, which is considered to be excessive. To reduce the amount of vehicle crossovers the outdoor carparking to the eastern part of the site should be moved internally and co-located with the other vehicular car spaces. This will reduce the number of vehicle entrances from Grand Avenue so that the front setback can accommodate more soft landscaping and be safer for pedestrian and cycle movement along Grand Avenue. The Fire brigade access could still be retained but this access point would then only be used in emergency situations.	The proposed vehicular crossovers have been designed and located with pedestrian and vehicular safety in mind. The crossovers separate the various types of traffic entering and leaving the site, mostly being heavy vehicles and passenger vehicles. The location of car parking areas have therefore been located and designed with pedestrian safety as a key component of the site layout and building design. Removal of the carpark as requested would result in disused land which is not considered



		orderly and economic development and is an inefficient use of land. The carpark location provides a safe access point for pedestrian movements by providing direct access to offices. The number of vehicular crossings is suitable noting the dense landscape planting scheme proposed and significant frontage width which does not result in driveways dominating the frontage and streetscape.
	Given the number of driveways the site and layout should ensure that entrances and activities are easily identifiable by prospective users.	The signage plan has been updated in the Architectural Plan set submitted in Appendix A attached to this response. The signage has been amended to provide a pylon sign at the eastern end of the site for vehicles approaching the site to identify the relevant tenancies, as well as the relevant driveway they are required to enter from. Each driveway will have a sign for vehicles to identify the most suitable entrance or exit and signage placed throughout the site will assist drivers with wayfinding within the site. The signage proposed is consistent with the expectation for industrial developments which allows drivers of vehicles varying in scale to identify the site and most appropriate access point.
	The carpark ramp running along the front façade visually dominates the front façade. This elevation should not be taken up by vehicular movement as it is facing a future highly pedestrianised street (Grand Ave) and opposite a possible mixed-use residential area which will be highly activated. Otherwise, it is recommended that the currently proposed metal screen have angled fins to further conceal the vehicular movement.	The front façade was intentionally designed with the proposed colours, finishes and materials along the car park ramp to assist in screening the development whilst also identifying the ramp for drivers coming to the site. Whilst Grand Avenue will be a pedestrianised street, the development is for a warehouse and distribution facility and the applicant has proactively engaged with the architect to design a high quality, architecturally designed development. The site is within the urban services precinct and it is expected developments such as the proposed development, will be



		located on sites such as this. The built form has been strategically designed to locate loading and key truck manoeuvring activity within the centre of the development, with only the level one ramps required for functionality located on the north of the site. The architectural treatment to the ramp has been enhanced to provide further screening through the use of additional angled fins. This is considered appropriate in the context of the development and broader precinct, noting there is a 20m landscape setback between the build form and Grand Avenue.
	<u>CPTED</u> The building design should consider CPTED and safety issues by providing opportunities for casual surveillance of the streetscape, public domain and carparking areas. The building should provide some windows, lighting or secondary access door to address the carpark to ensure safety for users.	A CPTED report has been prepared and is submitted with this response which considers the relevant requirements.
	<u>Public Domain</u> The development should include a Public Domain Alignment Drawing package including co-ordinated civil and landscape architectural drawings resolving all levels and showing proposed indicative public domain treatments in accordance with the requirements outlined in the Parramatta Public Domain Guidelines (Chapter 2). The proposal should provide an upgraded and widened footpath (without damaging the existing street trees). The public domain drawings should also demonstrate that street trees are provided every 8-10m.	The footpath is outside of the subject site and no works are proposed in this area other than driveway crossovers. The Camellia Rosehill Place Strategy mentions wider footpaths but doesn't provide for adequate design details at this stage.
	<u>Contamination</u> It is recognised that the site has significant contamination concerns, predominately the presence of friable asbestos. The proposed approach to managing this as outlined in the Remediation Action Plan (RAP) and Long-Term Environmental Management Plan (LTEMP) is considered appropriate.	Noted.
	It is recommended that an NSW EPA accredited Site Auditor is engaged by the applicant to review the draft RAP and LTEMP prior to their finalisation and to provide a Site Audit Statement indicating that the site	Noted.



	can be rendered suitable for the proposed use subject to completion of the RAP, validation and LTEMP.	
	A condition requiring a covenant on the title making reference to the LTEMP should be imposed on any development consent to ensure that any future land-owners are made aware of the LTEMP and any management requirements in perpetuity.	Noted.
	<u>Acoustic</u> It is noted that the proposal seeks approval for usage of the site on a 24 hour/7 days a week basis, this may present issues to sensitive receivers located across the Parramatta River in the Rydalmere/Ermington area as 24 hour usage in this area has elicited noise complaints previously. It is expected that the individual tenants will submit acoustic assessments with any further development applications for usage of the tenancies and further detailed assessment of any potential noise impacts could be carried out at this stage.	The proposed development is for a warehouse and distribution facility and the Noise and Vibration Impact Assessment prepared by RWDI considers the operation of the facility on a 24 hour, 7 days a week basis. As identified in the report, the proposal is for a warehouse and distribution facility only and complies with the noise criteria and relevant standards. Any future tenants that propose a different land use will be required to consider the noise and vibration impacts associated with that development through the relevant approval pathway.
	<u>Waste</u> The submitted Waste Management Plan (WMP) is satisfactory regarding the proposed management of demolition and construction waste. Further detail, in business specific WMPs, will need to be reviewed at tenant DA fitout stage.	As noted above, any future tenants that propose a different land use will be required to consider the waste generation, management and disposal associated with that development.
	<u>Construction Environmental Management Plan (CEMP)</u> A CEMP should be developed for this proposal given its size and scope. This Plan should include sub-plans that provide further detail on the various environmental aspects i.e. waste, noise, air quality, contamination management, hazardous materials etc anticipated during the demolition and construction stages. This would also need to include a community engagement and complaint response plan with detail on any community notification required and complaint contact information (email, phone number).	A CEMP will be prepared prior to commencement of construction of the development.
	<u>Trees and Landscaping</u> The recommendations within the Arboricultural Impact Assessment and tree protection plan should form explicit part of any approval. Appropriate conditions should also be imposed to ensure that the landscape	Noted. No action required.



	package is implemented and certification provided from a qualified landscape architect.	
	<u>Parking</u> The Parramatta DCP 2011 requires 1 space per 70m2 of industrial GFA and 1 space per 50m2 of office GFA. Accordingly, the development is required to provide 599 parking spaces. The development proposes 209 parking spaces including 6 accessible parking spaces meaning that it has a shortfall of 390 parking spaces. The Traffic report justifies this shortfall with reference to the Camelia Rosehill Place Strategy (the Arcadis Report). This on its own is not sufficient to justify the shortfall. The application is required to provide further information to justify this. This is to include providing further clarification how the total forecasted population of 450 was derived. Furthermore, clarification is required as to whether this number is to be divided across 2 shifts as stated in the report (12 hours each shift) or 3 shifts and what the overlap will be between staff arriving and staff finishing. The Traffic report should then use this information as well as the existing mode share to determine if the proposed parking rate will be sufficient.	<u>1. Parking provision</u> • The Proposal sits within the Camellia-Rosehill Precinct, hence the Camellia-Rosehill Place Strategy (the Place Strategy) is applicable to the Proposal. • The parking rates outlined in the Place Strategy is 1 space required per 200m2, as such the minimum parking requirement is 208 parking spaces. • Notwithstanding, the parking rates outlined within the latest Parramatta DCP 2023 (came into effect on 18 September 2023) requires 1 space per 300m2 for industrial warehouse and 1 space per 40 m2 for industrial ancillary office, which is as same as RMS Guide. • Therefore, the Proposal adopts the parking rates that demonstrates within the DCP 2023, and the minimum parking requirement is 214 parking spaces. (Refer to Section 5) <u>2. Justification of parking provision</u> • The total forecasted population of 458 staff was provided to Ason Group, and it was originally outlined within a Cost Summary Report prepared by Rider Levett Bucknall (RLB report). The report is to forecast the perceived employment contribution throughout the community per year from the entire project. It should be noted that the forecasted maximum population has been based on a conventional warehouse in the



		absence of committed occupiers, with the population expected to be reduced in the instance where some automation is introduced in the future. Moreover, as the Site is expected to operate 24-hour / 7 days, it is assumed that there shall be 2 or even 3 shifts across the 24-hour period, and therefore would be 229 staff as the peak number of staff on-site at any one time. Considering the current mode share of "Car as driver" is 84%, as outlined in Table 37, a worst-case scenario of 193 parking spaces would be required, and in most cases, this would be higher than the actual demands. However, the provision of 214 car parking spaces exceeds this worst-case scenario.
	<u>Bicycle Parking</u> The Parramatta DCP 2011 requires 1 space per 200m² GFA for industrial, retail, businesses and office developments. Accordingly, the development is required to provide 206 bike parking spaces as per the DCP. The submitted Traffic report considers this rate to be excessive for the proposed development as it assumes there to be a maximum of 225 staff on the premises at any one time. The report also refers to the planning Guidelines for Walking and Cycling dated December 2004 and proposed only 19 bicycle spaces. It is acknowledged that the rate stated within the Parramatta DCP 2011 is excessive for the proposed development as this rate does not differentiate between office and industrial developments. As such, consideration is given to the newly created Parramatta DCP which requires 1 space for every 1,000m² for industrial developments and therefore, would require 41 bicycle storage spaces. It is considered that the provision for 41 bicycle parking spaces to be more appropriate than 19 spaces given the long-term goals of having a mode shift towards more active transport options and the fact that the use of each warehouse is not specified meaning staff occupation numbers can be varied.	The bicycle parking rates that outlines within the latest Parramatta DCP 2023 (came into effect on 18 September 2023) requires 1 space per 1000m² of GFA for employees. The Proposal adopts the parking rates that demonstrates within the DCP 2023, and the minimum bicycle parking requirement is 41 bicycle spaces. Therefore, the provision of 41 bicycle parking spaces satisfies the requirement (Refer to Section 5.5 of the TMAP).



	<u>Green Travel Plan</u> A Travel Plan is a package of measures designed to reduce car trips and encourage the use of sustainable transport. As per section 4.3.1 (Camellia and Rydalmere) of the Parramatta DCP 2011 a Green Travel Plan is required as the development contains 5000sqm of gross floor space or 50 or more employees. As such a Green Travel Plan should be provided, particularly in circumstances where a variation to parking rates is proposed. Alternatively, where a Travel Plan is required as a condition of development, it should be a requirement that it be submitted for approval to the Consent Authority prior to the release of the Occupation Certificate. If the future occupant(s) are known, then the Travel Plan must be prepared in co-operation with them. Implementation of the recommendations in the Green Travel Plan should be a 'use' condition of consent applicable for the life of the development.	A Preliminary Green Travel Plan (GTP) has been provided within the TMAP (refer to Section 9), and it is expected that the requirement of a detailed GTP would form a Condition of Consent upon of approval.
	<u>Flood Engineering</u> Council staff are supportive of the proposed flood planning and stormwater design provided that the engineering conditions in attachment 1 of this letter are applied to any development consent.	Noted – no further action required.
	<u>Development Contributions</u> Council development contributions are required to be conditioned as per City of Parramatta (Outside Parramatta) CBD Contributions Plan 2021 – Amendment 1. Council has calculated the contribution amount as \$1,109,465.37.	Noted – no further action required.
NSW Fire and Rescue	Given the size and complexity of the proposed facility, and to ensure first responders have information readily available to render safe any incident, FRNSW make the following recommendations: • Safe, efficient, and effective access should be provided in accordance with FRNSW fire safety guideline - Access for fire brigade vehicles and firefighters. • An Emergency Plan (EP) should be developed for the site in accordance with HIPAP No.1 • An Emergency Services Information Package (ESIP) should be prepared in accordance with FRNSW fire safety guideline – Emergency	Noted – no further action required.



	services information package and tactical fire plans.	
Sydney Water	• Potable water and wastewater should be available. • There is a ventshaft located within the north-eastern boundary of the site. This will need to be retained. Any proposed adjustments must comply with Sydney Water's Technical Requirements: Building over or adjacent to pipe assets. • Amplifications, adjustments, and/or minor extensions may be required.	Noted. The development will not result in any impacts to the ventshaft located in the north-eastern corner of the site. Refer to the Warehouse GF Plan (Drawing No DA100) in Appendix A.
Heritage NSW	The Aboriginal Cultural Heritage Assessment Report (ACHAR) identifies that the project area has nil-low archaeological potential primarily on the basis that it is unlikely that intact soil deposits will remain in the project area. It is understood that the project area has been highly disturbed by historical land use, including the deposition of fill and prior building and infrastructure construction. Soil landscape mapping identifies that the project area is within land that is documented to have been disturbed to at least one metre in depth. However, with reference to the project area's proximity to the recorded extent of the Parramatta Sand Body and its direct association with the Parramatta River, please provide a more detailed evaluation of the potential for deep alluvial deposits (with the potential to contain archaeological deposit) to be present below the depth of current disturbance within the project area.	The ACHAR has been updated and is attached to this response as Appendix C. Section 3.2.1 of the ACHAR addresses the evidence of depth of disturbance and limits and locations of Parramatta Sand Body.
	In relation to Aboriginal party consultation, Appendix 1 (consultation documents) has been redacted from the ACHAR. To demonstrate the adequacy of consultation process, please provide a copy of all consultation documentation. Section 2 of the ACHAR indicates that consultation was completed however the executive summary states that consultation has not yet been finalised. Please also adjust the executive summary accordingly.	The ACHAR has been updated to provide all unredacted information with appendices demonstrating the consultation process. The executive summary has also been updated to reflect the consultation undertaken.
Environment and Heritage Group	<u>Flooding</u> The report states that the site is not impacted by overland flow. However, the mapping provided in the accompanying EIS (Section 5.21) includes local flood mapping of H1 and H2 hazard on the site, which shows up to 500mm of flooding may be present. This is stated as mapping from the Camellia Rosehill Place Strategy and is consistent with the Final Draft Parramatta Flood Study Report Rev F	Refer to letter prepared by Costin Roe attached to this submission as Appendix E1 dated 14 December 2023.



	59915074/304600102 which is currently on exhibition on Council's web page.	
	The CRc report has inconsistent statements regarding the Probable Maximum Flood (PMF), at the site and incorrectly uses the value from the Camelia Drainage study 6.0m rather than the higher value resulting from the Paramatta River study of 7.8m. • The proposed floor level is stated as being above the PMF, however, it is still 1m below the PMF in Parramatta River.	Refer to letter prepared by Costin Roe attached to this submission as Appendix E1 dated 14 December 2023.
	The proposal is for a significant intensification of land use being multi-level warehousing and the potential for significant losses in flood events above the chosen floor level must be considered.	Refer to letter prepared by Costin Roe attached to this submission as Appendix E1 dated 14 December 2023.
	Significant fill is proposed on site (up to 1.5m on average) to achieve the nominated floor level. No assessment of the impact of this fill on flooding in the vicinity has been carried out. The Northrop assessment simply states no flood impact will occur without providing any justification.	Refer to letter prepared by Costin Roe attached to this submission as Appendix E1 dated 14 December 2023.
	The CRc report indicates that shelter in place will be possible or evacuation via Grand Avenue. Grand Avenue is impacted by flooding in the 1% event, and it has not been demonstrated that evacuation will be feasible.	Refer to letter prepared by Costin Roe attached to this submission as Appendix E1 dated 14 December 2023.
	If shelter in place is to be considered, the building must satisfy the structural requirements to resist a PMF event and carry out the assessment nominated in Figure 21, considering emergency management in redevelopment or infill development compatible with existing zoning, which is found in the DPE Guideline, Support for Emergency Management Planning, Flood Risk Management Guideline EM01.	Refer to letter prepared by Costin Roe attached to this submission as Appendix E1 dated 14 December 2023.
	Calculations for the need for sediment management on site are incorrect and nominate a disturbed site area of 0.36ha. Although existing slabs and pavements are intended to remain in place, achievement of the final landform requires importation of over 34,000 cubic metres of fill which will be placed over most of the site area. The degree of disturbance on site and the potential for mobilisation of sediment is currently underestimated.	Refer to letter prepared by Costin Roe attached to this submission as Appendix E1 dated 14 December 2023.
	EHG strongly recommends that a consultant specialised in flood modelling and floodplain management be engaged to carry out a flood impact and risk assessment. Guidance on flood risk and impact assessment requirements is found in the Flood Risk Management Guideline (Department of Planning	Refer to letter prepared by Costin Roe attached to this submission as Appendix E1 dated 14 December 2023.



	and Environment, June 2023). Impact assessment is to be provided for floods up to the PMF event to comply with Parramatta Council's Development Control Plan requirements.	
	EHG further advises that consultation with the SES is required to be undertaken regarding flood emergency management. The email address for such matters is rra@ses.nsw.gov.au. Further, information regarding the potential for increased load on emergency services due to the development is required.	Contact has been made with SES with a response provided on 19 December 2023 confirming a response will be provided if deemed applicable. Refer to letter prepared by Costin Roe attached to this submission dated 14 December 2023.
	<u>Biodiversity</u> In accordance with Clause 7.9 of the Biodiversity Conservation Act 2016, EHG issued a Biodiversity Development Assessment Report (BDAR) waiver for the subject State Significant Development on 28 June 2023 (ref DOC23/513721). The EIS is consistent with the description listed in Schedule 1 of the determination of works in the BDAR waiver and therefore EHG has no further comment to make on biodiversity impacts. If the proposed development is changed so that it is no longer as described in Schedule 1 of the determination, the applicant will need to lodge a new waiver request or prepare a BDAR.	Noted – no further action required.
Endeavour Energy	Provides general comments raising no objections to the proposal.	Noted – no further action required.
NSW Ports	Provides support for the proposed development.	Noted – no further action required.
Jemena	Provides general comments raising no objections to the proposal.	Noted – no further action required.

Table 5 below provides a response to the objection from GWF.

TABLE 5 – RESPONSE TO SUBMISSION

Objector	Comment	Response/Action
George Weston Foods (GWF)	Concern is raised regarding the operation of the light rail which will have significant impact on the efficient operation of the GWF owned land at 15 Grand Avenue, Camellia when considering traffic impacts.	Not a matter for consideration with the proposed development.
Submission prepared by Knight Frank	The operation of the light rail and intensification of development in the surrounding area including the subject development [proposed development at 6	The light rail is not a matter for consideration with the proposed development.



	Grand Avenue] will impact the operation of the GWF development.															
	<u>Access and Queueing</u> Four access points are proposed as part of the subject development, all of which are on Grand Avenue. While the Transport Management and Accessibility Plan suggests there is sufficient access to the site, it is unclear whether the impacts including queuing along Grand Avenue have been fully considered. The AM and PM peak hour traffic generation are 128 and 121 vehicles per hour respectively for commercial vehicles. Total daily trips for the site are estimated to increase from 336 to 1,221 movements, which represents a significant increase. It is understood that the majority of light vehicles and all heavy vehicles will access the development site by way of Grand Ave, performing a U-turn manoeuvre towards the eastern end of the GWF site. This substantive increase in movements at this location will significantly impact the ongoing operation of our client's site particularly with regard to servicing and queueing. This will be exacerbated by the Parramatta Light Rail Stage 2 corridor which will intersect the GWF site and cause frequent interruptions to its operations, as internal access within the site will be disrupted by services. From the documentation submitted with the application it is our view that insufficient consideration has been given to the impact of the development on the GWF site with regard to queuing and particularly in the context of the eventual operation of the light rail. We reiterate that our client has every intention of continuing the current operation of the site, that the onus is on the applicant to satisfy the relevant statutory considerations and the key issues listed in the Planning Secretary's Environmental Assessment Requirements.	Currently Grand Avenue is an urban road and has 2 lanes on each direction with parking permission on both sides. However, it has been considered as 1 lane within the following analysis since the on-street parking would occupy 1 lane. According to Transport for New South Wales (formerly, Roads Traffic Authority), Guide to Traffic Generating Developments 2002 (RMS guide), the peak hour flows per direction for 1 lane at Level of Service (LoS) C would be 600 veh/hr and LoS D would be 900 veh/hr. The passing traffic volumes along the GWF site during weekdays would be maximum of 143 veh/hr and 211 veh/hr at AM and PM peak, respectively, refer to below table. Therefore, the traffic flows at Grand Ave would operate within the capacity of the road network and would not subject to any queueing on the public road network. <table><tr><th colspan="4">Grand Avenue Link Capacity Analysis</th></tr><tr><th>Period</th><th>Road Type</th><th>RTA for one lane LOS C traffic flow</th><th>Project Case Scenario one lane v</th></tr><tr><td>AM Peak</td><td rowspan="2">Urban Road</td><td rowspan="2">600 vehicles per Hours</td><td>143</td></tr><tr><td>PM Peak</td><td>211</td></tr></table> Moreover, additional traffic survey and SIDRA modelling has been undertaken for the two accesses of the GWF site, to analyse the impacts of the U-turn manoeuvre towards the eastern end of the GWF site. The results are outlined in table below and Table 32 to Table 34 within this TMAP Issue III, indicates that the U-Turn manoeuvre would operate as LoS A for 2023 Existing Base Case, 2026 Future Case and 2026 Future Project Case. As such, there would be no queueing and delay on the GWF site access points and the U-turn point. The results clearly indicate that the U- turning	Grand Avenue Link Capacity Analysis				Period	Road Type	RTA for one lane LOS C traffic flow	Project Case Scenario one lane v	AM Peak	Urban Road	600 vehicles per Hours	143	PM Peak	211
Grand Avenue Link Capacity Analysis																
Period	Road Type	RTA for one lane LOS C traffic flow	Project Case Scenario one lane v													
AM Peak	Urban Road	600 vehicles per Hours	143													
PM Peak			211													



		development trips will not impact the flow of Grand Avenue as there is ample spare capacity and sufficient gap for completing U-turns. (Refer to Section 6.9 of the TMAP)
	<u>Service Bays</u> Further to the matter of the site being adequately serviced, only 48 service bays are proposed as part of the development whereas 56 are required as detailed in the Traffic and Transport Technical Implementation Report prepared by Arcadis in support of the Camellia-Rosehill Place Strategy. The Transport Management and Accessibility Plan (TMAP) does not provide a robust justification of this variation. The shortfall in service bays will contribute further to queuing and traffic impacts to neighbouring sites. We query this discrepancy and raise the need for adequate service bays to be provided in support of the development.	The service bay rate outlined in the Place Strategy is 1 loading bay per 800 m2 GFA. Moreover, the service bay rate of a similar and recently approved First Estate development at Distribution Drive, Orchard Hills has been reviewed and provided within Section 5.7. It has outlined that the service bay provision for that development is expected to range between 1 space per 778 m2 and 2,325 m2 of warehouse GFA. The service bay rate of the Proposal is calculated to be 1 space per 845 m2, which is within the above range and closer to the maximum rate. Moreover, the Loading Dock Management procedures have been outlined in Section 7.3.6. It is expected that an Operational Traffic Management Plan would form as part of the Condition of Consent and that it can cover the content of Loading Dock Management Plan (LDMP). Additionally, the proposal has provided 9m wide roller shutter doors to loading docks which is 1.5 times larger than industry standard which allows for flexibility in loading. Therefore, the Proposal will be able to facilitate the on-site servicing activities to avoid any queuing or traffic impacts on the surrounding road network.
	<u>Parking</u> The proposed development will provide for 209 carparking spaces, which the supporting documentation has detailed as meeting the Camellia-Rosehill Place Strategy carparking requirement of 1 space per 200m2 of GFA. The TMAP then refers to a separate Parramatta DCP 2011 car parking rate of 1 space per 70m2 of GFA. We have been unable to find this reference in Council's DCP and query the	Refer to response to City of Parramatta Council in the table above.



	origin of this rate. More importantly, while the TMAP acknowledges there are differing rates that would seem to apply to the redevelopment of the site there is no comparative analysis of the requirements and why a lesser rate has been adopted and considered appropriate for the development.	
	Furthermore, and in addition to the consideration of numerical car parking rates, we note that there is estimated to be up to 450 staff on site with a peak of 225 staff at any one time. Table 31 from the TMAP suggests that the majority of employees (86%) will drive to work (either car or truck) as their normal mode of transport, whereas public transport and carpooling represents only 10% of travel modes. It is unclear to what extent the proponent has considered the changeover in shifts given the significant staffing numbers and what impact this may have on the demand for on-site parking.	
	Our principal concern is that sufficient car parking is provided to service the development with an appropriate tolerance to ensure there is no impact on street parking availability nor the safe and efficient operation of the local road network. From the documentation submitted, it is our view that the proponent has not interrogated to a sufficient degree the car parking needs for what is a significant development and the impacts on the locality.	
	<u>Road Upgrades to Grand Avenue</u> The submission suggests that no road upgrades are required despite the significant increase in traffic from heavy vehicles in the locality and particularly the U-turn manoeuvre at Grand Avenue in order to gain site access to the site. For the reasons outlined in this submission, inadequate consideration has been given to the impact of the development on the operation of Grand Avenue at this location and particularly the impact on the operation of the GWF site. As such it is considered that insufficient consideration has been given to any necessary road upgrades that would be required to mitigate the impacts of the development.	Refer to response to parking comments provided by City of Parramatta Council in the table above.
	<u>Construction Traffic and Parking</u> Our client is concerned regarding the construction traffic and associated car parking during works and the impacts on the operation of their site. While it is	A Preliminary Construction Management Plan (CTMP) has been provided within the TMAP (refer to Section 8), and it is expected that the requirement of a detailed CTMP and



	acknowledged that a Preliminary Construction Traffic Management Plan has been prepared in support of the application by its nature it is preliminary. We would request that there is ongoing consultation and engagement with GWF when furthering this Plan and as there is more detail regarding the construction methodology.	the general consultation requirement would form a Condition of Consent upon of approval.
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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 EP&A Regulations.



- 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, DPE has now been provided with sufficient information and documentation to progress the assessment of SSD-55522478. We request that DPE complete the assessment of the application and proceed to determination.



