STATEMENT OF ENVIRONMENTAL EFFECTS

10 GRAND AVENUE, ROSEHILL

7 SEPTEMBER 2017
FINAL
PREPARED FOR GRAND 4 INVESTMENT PTY LTD

URBIS

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

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Report Number	Final

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1. INTRODUCTION

1.1. OVERVIEW

This Statement of Environmental Effects (SEE) has been prepared by Urbis Pty Ltd on behalf of Grand 4 Investment Pty Ltd to accompany a Development Application (DA) submitted to Parramatta City Council (Council) for site clearing and remediation works, tree removal, civil and landscaping works and the demolition of the existing industrial buildings and the construction of a warehouse and distribution centre with on grade carparking for 460 vehicles at 10 Grand Avenue, Rosehill (the site). The application is made pursuant to section 80A of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The proposed warehouse and distribution centre will comprise a GFA of 54,795m^2 spread over two buildings. Building A will be located on the northern portion of the site and will contain three (3) warehouses whilst building B will be located on the southern portion of the site and will contain two (2) warehouses. Each warehouse will also contain ancillary office space and communal open space, with carparking located within both the northern and southern setbacks of the site, servicing each of the buildings.

The proposal has been designed to facilitate the staged construction of the development, with the southern section of the site developed within stage 1 and the northern portion developed in stage 2. All site clearing, remediation works, civil works and landscaping works will also be carried out within the respective stages.

The proposed development is not identified as being integrated development however the development does trigger referral to RMS for concurrence.

This SEE has been prepared in accordance with the provisions of section 79C of the EP&A Act and considers the consistency of the proposed development against relevant legislation and environmental planning instruments as well as the likely impacts that may be associated with the development.

In accordance with the *Parramatta LEP 2011*, the subject site is located within the IN3 Heavy Industry zone, of which the proposed warehouse and distribution centre is permitted with consent. Pursuant to clause 4.3 and 4.4 of the *Parramatta LEP 2011*, the site is afforded a maximum building height of 12m and a maximum FSR of 1:1, respectively. The proposed development has a height of 13.7m and an FSR of 0.64:1. Contravention of the height of buildings development standard is comprehensively justified in the accompanying Clause 4.6 exception to development standards (**Appendix A).**

1.2. SITE DETAILS

The subject site is located at 10 Grand Avenue, Rosehill and is legally described as Lot 4 in DP623497. The site has a frontage of 238.7m to Grand Avenue in the north, extending for a depth of approximately 359.5m to form a total site area of 85,098m^2.

The site currently contains a warehouse and factory operated by CSR Roofing, which is commensurate with the IN3 Heavy Industrial zoning of the subject and surrounding sites, as per the *Parramatta Local Environmental Plan 2011*.

The site is predominately of a hard stand nature with vegetation limited to the Grand Avenue frontage and along the rear boundary.

An internal roadway exists along the sites eastern (ingress) and western (egress) side boundaries, with secondary vehicular access points located in the centre of the site.

The site is identified as being contaminated with asbestos, heavy metals, with volatile chlorinated hydrocarbons (CVHs) present within the groundwater, which has been identified as leeching from the western neighbouring property at 4 Grand Avenue, Rosehill.

A detailed survey of the site is provided in **Appendix C.**

1.3. THE PROPOSAL

The proposed development seeks to demolish the existing buildings and carry out site clearing and remediation works to facilitate the construction of a warehouse and distribution centre with associated carparking, landscaping and civil works. The proposal will be constructed in two (2) stages to allow for the continued operation of the existing use on the site, for the life of their lease. Note: This DA does not seek consent for staged development under Part 4 Division 2A of the Environmental Planning and Assessment Act 1979.

Specifically, the proposal seeks to undertake the following works:

Table 1 – Development Summary

Stage	Development component
Stage 1 Southern portion	• Site clearing / tree removal and remedial works • Civil works; • Construction of Building B, containing warehouse 4 (11,810m^2), office 4 (1,170m^2), warehouse 5 (11,820m^2) and office 5 (1,180m^2); • Bicycle parking for 20 bikes (2 bike racks, 10 spaces per office); • Southern section of the shared loading zone (total width being 50m); • Southern bitumen car parking, providing 165 spaces; • Landscaping works; and • Construction of retaining wall along the south, east and west.
Stage 2 Northern portion	• Demolition of the existing CSR factory and associated buildings; • Site clearing and remedial works; • Civil works; • Construction of building A, containing warehouse 1 (8,320m^2), office 1 (890m^2) warehouse 2 (9,805m^2), office 2 (890m^2); Warehouse 3 (8,040m^2) and office 3 (870m^2); • Bicycle parking for 31 spaces (broken down as follows: office 1, 7 spaces, office 2, 10 spaces and office 3, 14 spaces); • Northern bitumen car parking, providing 295 car spaces; • New site access from Grand Avenue; • Remainder of the shared loading zone; • Site landscaping works.

Upon completion, the two built forms will contain a total of 5 large warehouses (each 8,040m^2 – 11,810m^2), each with ancillary open plan office space, including equitable site facilities such as lobby and lift access to the upper mezzanine levels, WC, kitchenettes and outdoor space. The warehouse and distribution centre will be supported by car parking for 460 vehicles and 51 bike spaces, pavement areas and site landscaping.

1.4. REPORTS AND TECHNICAL INFORMATION

This SEE forms part of a range of documents that are submitted in support of the DA and which have been prepared by a team of specialist consultants, including:

Table 2 – Summary of Technical Documents

Report Plan/Title	Prepared by	Appendices
Clause 4.6 Exceptions to development standards	Urbis	Appendix A
Survey Plan	Land Partners	Appendix B
Architectural Plans, including: • Floor Plans • Elevations • Sections • FSR schedule • Shadow Diagrams • External Materials and Finishes	Pace Architects	Appendix C
Traffic and Parking Assessment	GTA	Appendix D
Arborist Report	Naturally Trees	Appendix E
Landscape Plan	Urbis (Landscape)	Appendix F
Civil Engineering Drawings	Northrop	Appendix G
Stormwater Management Report	Northrop	Appendix H
Remedial Action Plan	JBS&G	Appendix I
Draft Environmental Management Plan	JBS&G	Appendix J
Human Health Risk Assessment	JBS&G	Appendix K
DCP Compliance Table	Urbis	Appendix L
Hydraulic and Wet Fire Services Brief	Northrop	Appendix M
Electrical Services Plan	Northrop	Appendix N
Waste Management Plan	Elephants Foot	Appendix O
Building Code of Australia Report /		Appendix P
Section J Certificate	Northrop	Appendix Q

1.5. REPORT STRUCTURE

This SEE provides a detailed description of the site and the proposal and assesses it against the relevant heads of consideration set out in Section 79C of the *NSW Environmental Planning and Assessment Act 1979* (EP&A Act 1979).

- **Section 1:** Introduction;
- **Section 2:** Site and Locality – Description of the site and surrounding context;
- **Section 3:** Background – Site history and Pre-DA;
- **Section 4:** Proposed Development – Detailed description of the proposed development;
- **Section 5:** Strategic Planning Framework;
- **Section 6:** Section 79C Assessment – Detailed assessment of the proposal against the legislative and planning framework, including a comprehensive assessment against the Parramatta LEP 2011 and Parramatta DCP 2011; and
- **Section 7:** Conclusion.

2. SITE AND LOCALITY

2.1. LOCALITY

The subject site is located within the suburb of Rosehill, which is governed by the Parramatta Local Government (LGA). Rosehill is located 23km from the Sydney CBD and 1.5km from the Parramatta CBD, being Sydney's second largest city.

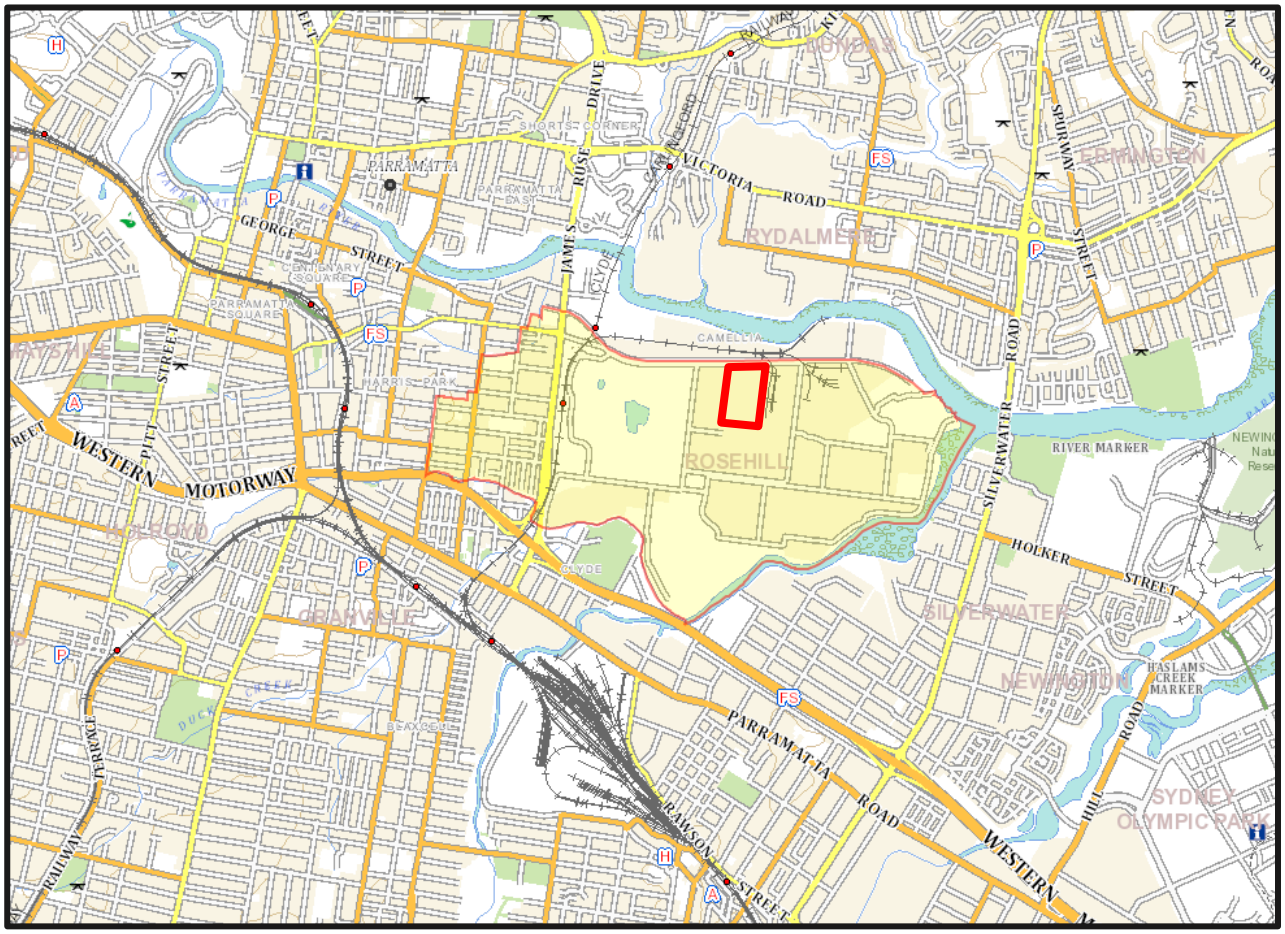

Figure 1 – Locality Map

Rosehill is characterised by a mix of residential, commercial, recreational and industrial land uses, with the suburb dissected by James Ruse Drive, running in a north-south direction. On the western side of James Ruse Drive is predominately low to medium density residential land uses. On the eastern side of James Ruse Drive is the Camellia Industrial Precinct which comprises approximately 321 hectares of predominately industrial uses, within which the subject site is located.

The Camellia Precinct is bound by Parramatta River in the north, the Shell Oil refinery and Duck Creek River in the east, James Ruse Drive in the west and the M4 Motorway in the south. The precinct has an extensive history of industrial and extractive industry uses, as well as containing prominent and well known private recreational uses such as the Rosehill Racecourse and the Sydney Speedway / Granville Showground.

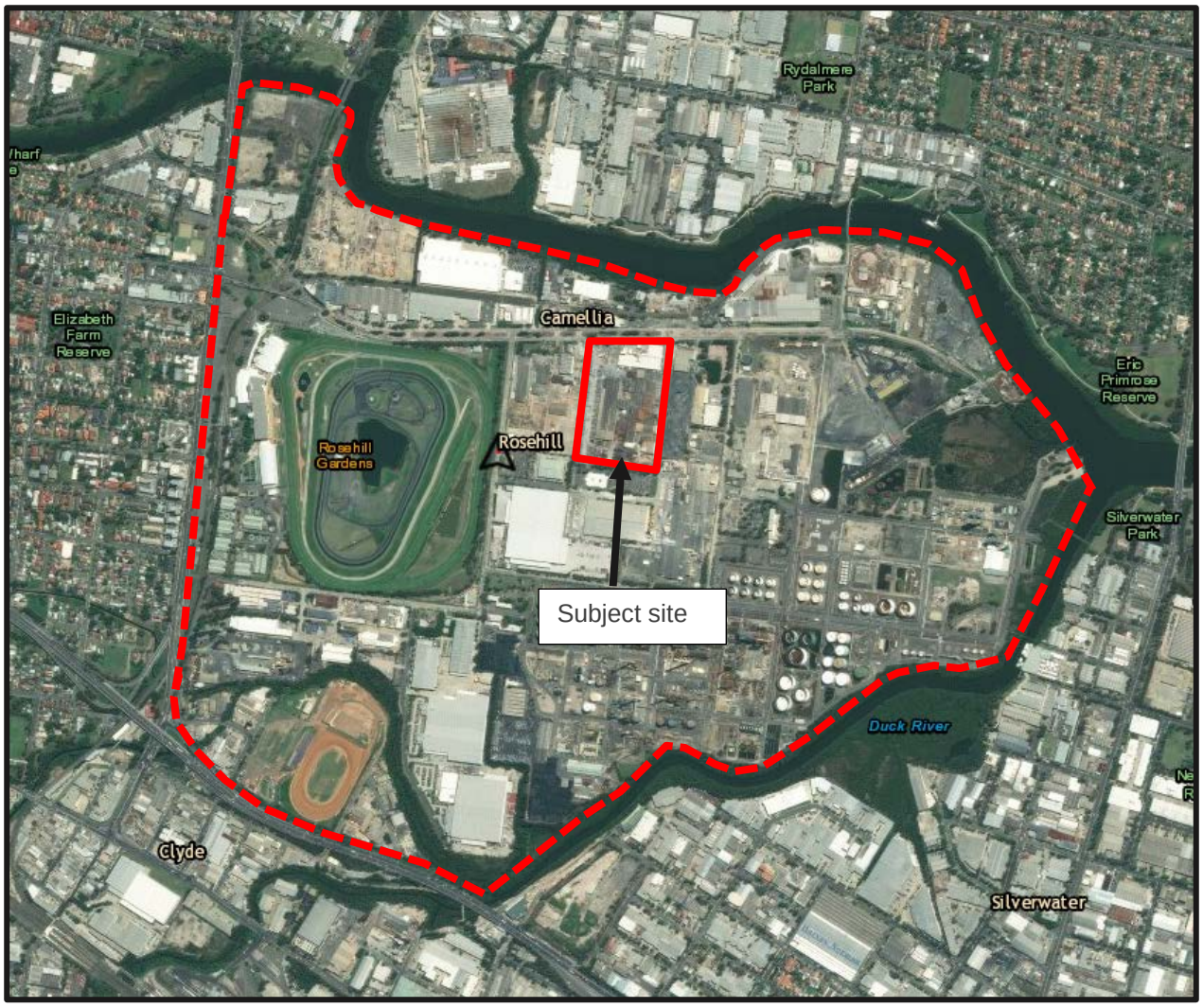

Figure 2 – Camellia Precinct

The immediate context consists of typical large format warehouses, with a number of allotments containing silos and other large structures that support the industrial natures of the uses. The current streetscape is inconsistent as a result of the varying built forms and uses with the area. Grand Avenue has limited street activation or footpath, which is reflective of the industrial land uses.

2.2. SITE DESCRIPTION

The subject site is located at 10 Grand Avenue, Rosehill and is otherwise known as Lot 4 in DP623497.

The allotment has a frontage of 238.7m to Grand Avenue in the north, extending for a depth of approximately 359.5m to form a total site area of 85,098m^2.

The subject site is of a regular rectangular shape with a splayed frontage to Grand Avenue. The site currently benefits from four (4) vehicular access points; the eastern driveway being reception and sales, open to the public; the central access points are for the semi-circle driveway which provide entry and exit for private site deliveries, with the distribution trucks exit the site along the western boundary.

Apart from the limited vegetation within the front setback and along the rear boundary, the site is of an impervious nature with hard stand areas primarily constructed of concrete, bitumen and gravel. The subject site is relatively flat, with a 1m decline from the south eastern corner (RL6.8) to the north western corner (RL5.8).

A site survey, prepared by LandPartners is included at **Appendix C.** An aerial photograph of the subject site is included at Figure 3.

Figure 3 – Aerial Photograph of the Site

2.2.1. Site History

The subject site was previously owned by CSR Limited, with the Monier Roofing manufacturing branch operating from the site. CSR sold the site in April 2017, with the business continuing to operate under an 'operating lease.'

In accordance with the downsizing, relocation and cessation of the existing manufacturing facility, the rear / southern portion of the site has been cleared, with the Monier Roofing now only operating from the northern portion of the site, which they will continue to do so for the next 3-4 years. It is intended that Monier Roofing will continuing operating during the first stage of construction.

As illustrated in the site photographs below, a large 2 storey warehouse and associated structures exists within the north eastern corner of the site. The buildings and structures will be demolished as part of the second phase of construction.

Picture 1 – Eastern Entrance – Site Reception and Public Sales

Picture 2 – Warehouse and Site Entrance 2

Picture 3 – Manufacturing Component of the Subject Site, as viewed from Grand Avenue

Picture 4 – Centre of the Subject Site, as viewed from Grand Avenue

Picture 5 – Subject Site and Western Access Point

Picture 6 – Extent of Grand Avenue along the Sites Frontage

Figure 4 – Site Photos

2.3. SURROUNDING LOCALITY

The surrounding land uses are characterised as follows:

- **North:** To the north of the subject site, on the northern side of Grand Avenue, is AB Mauri, a global industrial baking company.
- **East:** The eastern neighbour, being 10A Grand Avenue, is occupied by the Parramatta Motor Group, being a used car dealer.
- **South:** To the south of the subject site at 10 Colquhoun Street, is James Hardie Building Products.
- **West:** To the west of the subject site, at 4 Grand Avenue, is a 6.23ha vacant site which has a primary frontage to Grand Avenue in the north and a secondary frontage to Colquhoun Street in the west. This site is the former Akzo Nobel Chemical Factory site, which has resulted in contamination remaining present on the site.

Photographs of the surrounding locality are illustrated in **Figure 5** below:

Picture 7 – 15 Grand Avenue, Located to the North of the Subject Site

Picture 8 – Relationship between the Subject Site and 15 Grand Avenue, as viewed from Grand Avenue in the East

Picture 9 – Western Neighbour, Located at 4 Grand Avenue

Picture 10 – Eastern Neighbour, at 10A Grand Avenue

Figure 5 – Surrounding Development

2.4. TRANSPORT AND ACCESSIBILITY

2.4.1. Road Network

The subject site and surrounding area is well connected in terms of established road infrastructure. Existing vehicular access to the site is from the following major roadways:

- James Ruse Drive (via Grand Avenue) provides the main access to the site over the Railway Line. It is noted that the existing sequencing of traffic signals at the James Ruse Drive – Grand Avenue intersection and the carriageway capacity of the bridge over the railway line causes congestion at peak times.
- Parramatta Road (via Wentworth Street, Kay Street & Unwin Street) from the south. This route provides for 1 lane of traffic in each direction along Kay Street.
- M4 Motorway to either James Ruse Drive or Parramatta Road as described above.

2.4.2. Public Transport

As depicted in Figure 6 below, the subject site is serviced by a number of public transportation modes, including the Camellia Train Station, the Rydalmere Ferry and the M92 (Metrobus).

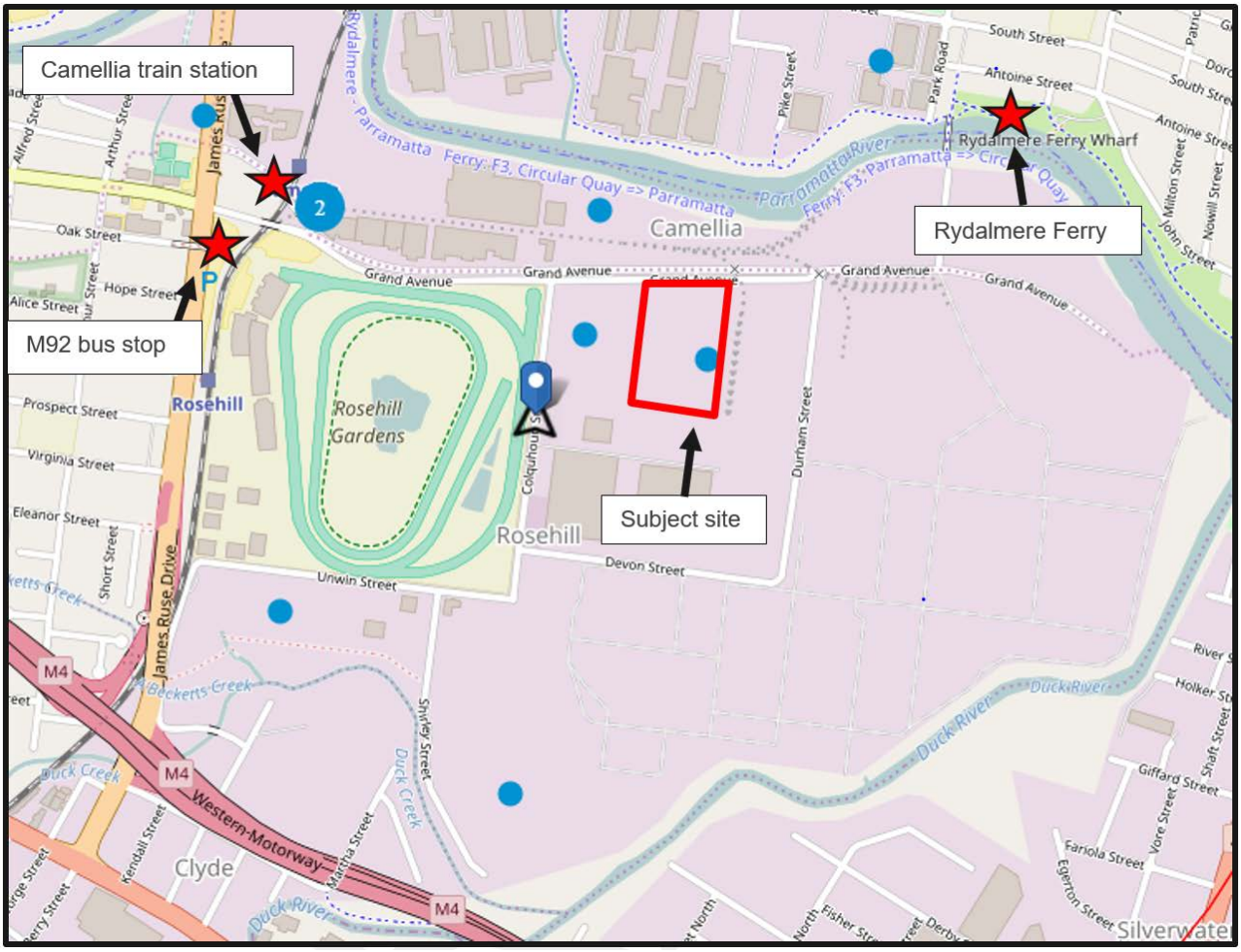

Figure 6 – Public Transport Locations in Proximity to the Subject Site

Train

As illustrated below, T6 Carlingford train line is located approximately 1km west of the subject site, with patrons arriving / departing from the Camellia Train Station. Trains servicing the Camellia station are infrequent, with waiting times varying from 40mins within peak times to 1 hour during non-peak times.

The T6 Carlingford line intersects with the T1 North Shore, Northern and Western Line at Clyde.

Figure 7 – Surrounding Rail Network (site depicted by red star)

Ferry

The subject site and surrounds are also accessible from the Rydalmere ferry wharf, which is located on the northern bank of the Parramatta River at Rydalmere, approximately 1.1km from the site. Access to the wharf is via the Thackeray Street pedestrian bridge. The ferry route connects to Parramatta and Sydney CBD, with the ferry departing / arriving every half hour during peak times and hourly during non-peak times, with the servicing operating from 6:19am – 10:30pm.

Bus

The M92 Metrobus is located approximately 1.3km west of the subject site, along James Ruse Drive, connecting the site to Parramatta and Sutherland. The M92 Metrobus provides for frequent transport to the site, operating every 10miutes during peak periods and every 20 minutes during off peak times.

2.4.3. Active Transport

Pedestrian and cycle access to the site is available via Grand Avenue (west) and Unwin Street (south). A pedestrian bridge from Rydalmere located at the northern end of Thackeray Street provides pedestrian access from the Rydalmere Ferry in the north east to the subject site.

A 2m wide footpath is constructed along the northern side of Grand Avenue providing safe pedestrian access between the subject site, the Camellia train station and the M92 bus stop along James Ruse Drive.

An unmarked cycle path exists along the southern boundary of Grand Avenue, which connects the site to the surrounding cycle network, which includes links to Clyde and Granville in the south, Parramatta in the west and Rydalmere in the north.

2.4.4. Parramatta Light Rail

The State Government as indicated that the Parramatta Light Rail line will be operational by 2023, providing for frequent public transportation from Westmead in the west to Parramatta CBD and Carlingford in the north, with trains servicing the proposed Camellia Station every 10 minutes, between 7am – 7pm on weekdays.

3. BACKGROUND

3.1. PRELODGEMENT DISCUSSIONS

On Wednesday 15 March 2017, a formal Pre-DA meeting was held with Parramatta City Council (Council reference: PL/27/2017).

Those present at the meeting included development advisory officers, engineering officer, environmental health officer and traffic engineering officer.

The key issues discussed with Council included site contamination and environmental issues, traffic and reduced parking, non-compliant building height and non-compliance with the DCP landscaping requirements.

Council provided in principle support for the proposed development.

As part of this formal lodgement, the proposed site planning and overall design has been further developed to address the concerns raised by Council. Whilst a number of non-compliances continue to exist within the proposed scheme, these are fully justified throughout the report and within the accompanying consultant reports.

4. PROPOSED DEVELOPMENT

4.1. OVERVIEW

The proposal seeks Council approval for the demolition of the existing buildings, site and remediation works, removal of 99 trees and the construction of a warehouse and distribution centre with associated carparking, landscaping and civil works.

In summary, the proposed development includes the following components:

- Demolition of existing factory and buildings;
- Site remediation works;
- Civil engineering works;
- 2 x industrial buildings comprising:
  - 26,165m^2 (Building A)
  - 23,620m^2 (Building B)
- Car parking for:
  - 460 car spaces
  - 30 loading docks
  - 51 bicycle spaces
- Removal of 94 trees;
- 2,594m^2 of landscaping works, including the replanting of 11,944 plants;
- Construction of 6.5m wide internal road along the east and west site boundaries;
- 50m wide road between Building A and Building B; and
- Retaining wall along the southern, western and part of the eastern boundary.

Upon completion, the two built forms will contain a total of 5 warehouses (each 8,040m^2 – 11,810m^2), each with ancillary open plan office space, including equitable site facilities such as lobby and lift access to the upper mezzanine levels, WC, kitchenettes and outdoor space.

The fit out and use of each of the warehouses and office space will be subject to separate applications, in accordance with tenancy requirements.

No subdivision, fencing or signage is proposed as part of this application.

The proposed development will require concurrence from RMS.

Architectural Plans prepared by Pace Architecture are included at **Appendix C.**

4.2. NUMERICAL OVERVIEW

Key numeric aspects of the proposal are provided at **Table 3** and the various components of the proposed development are described in the following sections.

Table 3 – Proposed Development Parameters

Parameter	Proposed
Site Area	85,098m^2
Land Use	Warehouse and Distribution
Building Height	13.7m ridge height with a 2.25^o roof pitch
Floor Space Ratio	0.64:1
Total Gross Floor Area	54,795m^2
Warehouse Gross Floor Area	49,795m^2
Office Gross Floor Area	5,000m^2
Site Coverage	61%
Hardstand Area	13,483m^2
Landscaped Area	3,507m^2 4.1%
Car parking	460 car spaces
Loading Docks	20 perpendicular loading docks suitable for 19m vehicles 10 recessed loading docks suitably for 26m double D vehicles
Bicycle Parking	51 bikes

4.3. STAGING OF THE CONSTRUCTION

CSR roofing currently lease the northern portion of the subject site, with the cessation of the existing factory expected to occur over the next 3-4 years. As a result of the continued operation, the proposed development will be constructed in stages, with Stage 1 comprising the southern section of the site (Building B) and stage 2 comprising the northern portion of the site (Building A). It is anticipated that there will be a 24 month delay period between the construction of the two stages.

Whilst CSR continue to operate on the site, a temporary retaining wall will be constructed, separating the proposed warehouse use from the existing factory, as illustrated below:

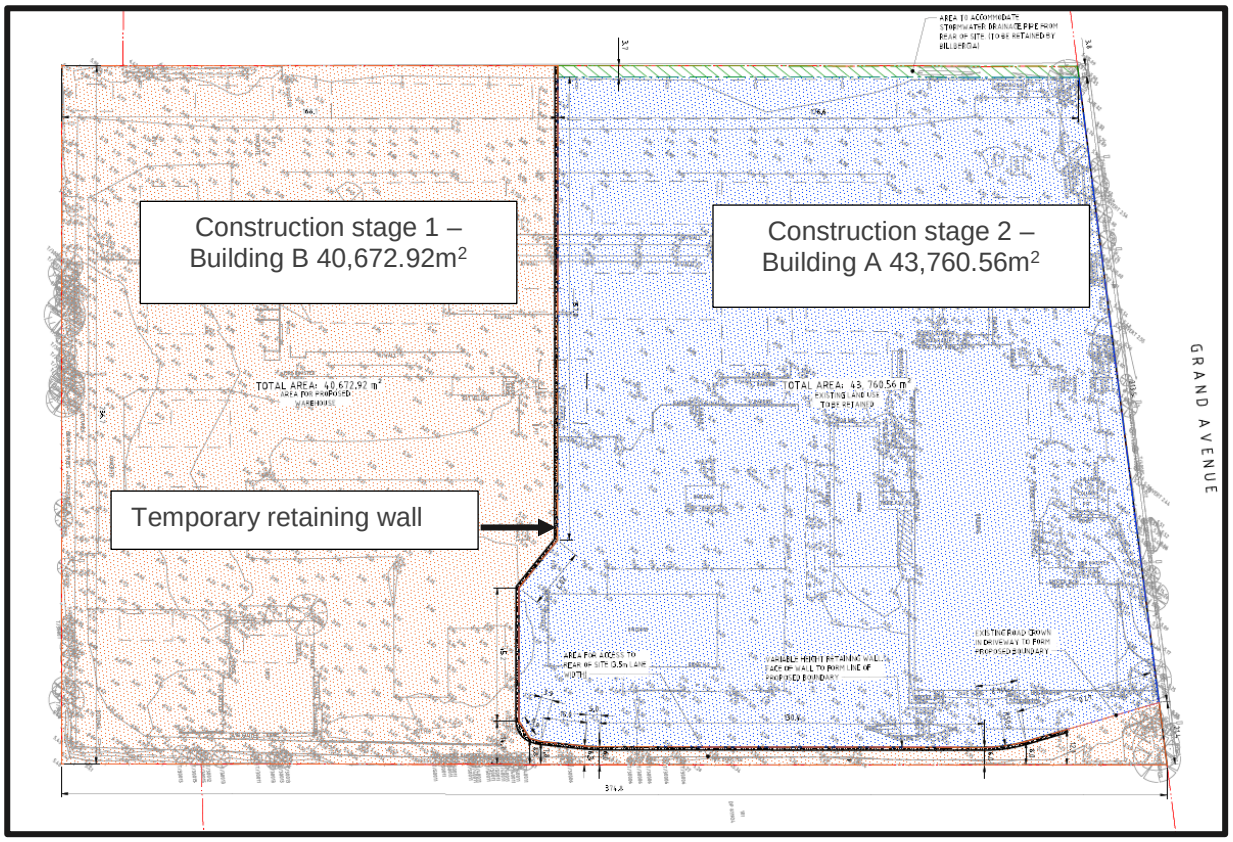

Figure 8 – Staging Boundary

The development has been designed so that Building A and B can operate independently, with all services required to facilitate building B being constructed within stage 1.

Table 4 – Development Summary

Stage	Development component
Stage 1 Southern portion	• Site clearing / tree removal and remedition works • Civil engineering works, including stormwater drainage line along the western boundary; • Construction of building B, containing warehouse 4 (11,810m2), office 4 (1,170m2), warehouse 5 (11,820m2) and office 5 (1,180m2); • Landscaped communal open space areas • Bicycle parking for 20 bikes (2 bike racks, 10 spaces per office); • Partial construction of 6.5m wide road and 34.5m of the shared loading zone (total width being 50m); • Car parking for 165 vehicles; • Removal of 68 trees; • Landscaping works; • Temporary retaining wall, separating the rear; and • Retaining wall along the southern and parts of the eastern and western boundary.
Stage 2	• Demolition of the existing CSR factory and associated buildings

Stage	Development component
Northern portion	• Site clearing and remediation works; • Civil engineering works; • Construction of building A, containing warehouse 1 (8,320m^2), office 1 (890m^2) warehouse 2 (9,805m^2), office 2 (890m^2); Warehouse 3 (8,040m^2) and office 3 (870m^2); • Landscaped communal open space areas; • Bicycle parking for 31 spaces (broken down as follows: office 1, 7 spaces, office 2, 10 spaces and office 3, 14 spaces); • Car parking for 295 vehicles; • New site access from Grand Avenue; • Remaining 15.5m of the shared loading zone; • Removal of 26 trees; and • Site landscaping works; • Remainder of retaining wall along the side boundaries.

4.4. HOURS OF OPERATION

The proposed warehouse and distribution centre will operate 24 hours a day, 7 days a week.

Such operating times are consistent with other warehouse and distribution centres and particularly those with heavy freight movements. The flexibility of operating hours allows for heavy rigid vehicles to take advantage of the surrounding road infrastructure network during non-peak times which reduces congestion.

4.5. STAFF

It is anticipated that each warehouse will employ a total range of 60-225 employees per shift across the site. Given the warehouses are intended to operate 24/7 hours, the following staff shifts are expected:

- Morning shift: 6am – 2:30pm
- Afternoon shift: 2:30pm to 11pm
- Night shift: 11pm – 6am

4.6. ACCESS AND PARKING

As detailed in the accompanying Traffic Report prepared by GTA (**Appendix D**), the proposed development provides two separate car parking areas capable of accommodating a total of 460 vehicles.

The proposed warehouse and distribution centre will continue to utilise the existing vehicular cross-over arrangements off Grand Avenue.

A 6.5m wide internal road way will be constructed along the full length of the eastern and western side boundaries, consistent with the existing traffic arrangements on the site.

A 50m wide road will also be constructed within the centre of the two buildings, capable of accommodating for adequate manoeuvring of vehicles associated with the loading docks.

4.7. LANDSCAPING

4.7.1. Tree Removal

As illustrated in the accompanying Arborist Report (**Appendix E**) The proposed development requires the removal of 94 trees, including:

- 77 trees on the subject site; and
- 17 trees within Councils road reserve, adjoining the northern / front boundary.

4.7.2. Deep Soil Planting

As illustrated on the accompanying Landscape Plan prepared by Urbis (**Appendix F**), the proposed development dedicates 4.1% of the site area to deep soil planting.

The landscaped concept plan incorporates a total of 11,944 individual plantings which are native to the locality, including 149 trees ranging in a mature height of 6m to 30m.

Deep soil zones are located along the periphery of the site boundaries, within the carparking islands and within the communal open space areas ancillary to the office spaces.

4.8. CIVIL WORKS

As detailed in the accompanying Civil Engineering Drawings (**Appendix G**) and Stormwater Design Report prepared by Northrop (**Appendix H**), new stormwater and civil infrastructure will be provided on the subject site. The existing stormwater trunk will be removed and new stormwater drainage will be installed, connecting the site to the existing established infrastructure network.

As stated within the accompanying report, the proposed on-site detention system requires approximately 77,389m^3 of fill (including the site capping layer required as part of the remedial works) to lift the site to facilitate a minimum FFL of RL7.10, which will enable stormwater flow to gravity feed to the existing stormwater infrastructure located within Grand Avenue.

4.9. REMEDITION WORKS

As outlined in the accompanying Remedial Action Plan (RAP) (**Appendix I**) the subject site is identified as being contaminated, with the source of contaminates being imported fill, past land use and leeching from adjoining properties. The most noted contaminates include asbestos and volatile chlorinated hydrocarbons (VCH).

The RAP states the follow:

“It is expected that current surface level will contain a marker barrier to prevent any access to the underlying asbestos impacted fill material. Following the placement of a marker barrier, it is expected that approximately 1.5m of virgin excavated natural material (VENM) will be placed above the marker layer.

The installation of the vapour barrier underlying the extent of the footprint of the proposed building, and the ongoing management of the vapour liner in the future, cause the potential human exposure pathways to soil impact present underlying the building to be sufficiently mitigated to not pose an unacceptable health risk to site occupants. There is no requirement for further remediation.”

5. STRATEGIC PLANNING

5.1. A PLAN FOR GROWING SYDNEY

A *Plan for Growing Sydney* (the Sydney Metropolitan Strategy) was released in December 2014 and is the NSW Government's 20-year plan for the Sydney Metropolitan Area. It provides direction for Sydney's productivity, environmental management, and liveability; and for the location of future housing, employment, infrastructure and open space.

Action 1.2.1 of the *Plan for Growing Sydney* seeks to "grow Greater Parramatta by connecting and integrating precincts which provide jobs, goods and services including Parramatta CBD, Westmead, Rydalmere, Parramatta North and Camellia with the existing core."

The plan seeks to achieve this in collaboration with Direction 1.3: Establish a new Priority Growth Area – Greater Parramatta to the Olympic Peninsula (GPOP). GPOP represents four distinct quarters linked by Parramatta River and the planned Parramatta Light Rail. In support of this direction, the Government will deliver key infrastructure to enable population and jobs growth.

The delivery of transport infrastructure and improved connectivity between the various precincts within the GPOP is a welcomed initiative that aligns with the proposed warehouse development.

5.2. DRAFT WEST CENTRAL DISTRICT PLAN

The draft West Central District Plan was released in November 2016. The district plan expands on and re-conceptualises a number of directions from *A Plan for Growing Sydney.* Specifically, the district plan anchors the Greater Parramatta to Olympic Peninsula (GPOP) as a major economic opportunity that will support the continued growth and delivery of Parramatta as Sydney's second city.

5.3. GREATER PARRAMATTA TO OLYMPIC PENINSULA URBAN RENEWAL AREA - CAMELLIA PRECINCT

The NSW Department of Planning and Environment (with input from Parramatta City Council) are undertaking a strategic review of the Camellia Precinct, with the intent of revitalising this precinct into a 21st Century Business, Industry and Entertainment Precinct.

A Land Use Infrastructure Implementation Plan is currently on exhibition until 7 September which identifies a vision for the Camellia precinct over the new 20 years.

The precinct planning will be governed by the SEPP (Sydney Region Growth Centres) 2006 and coincides with the construction and delivery of the proposed Parramatta Light Rail, which will extend from Westmead in the west, through Parramatta CBD and terminating at Carlingford in the north. Construction on the PLR project is expected to commence in 2018 with the project becoming operational in 2023.

It is anticipated that a second phase of the PLR project will be constructed, which would connect Parramatta with Olympic Park and Strathfield.

The Camellia Precinct is one of 12 priority precincts that form part of the Greater Parramatta to Olympic Peninsula Urban Renewal Area, as illustrated Figure 9 below.

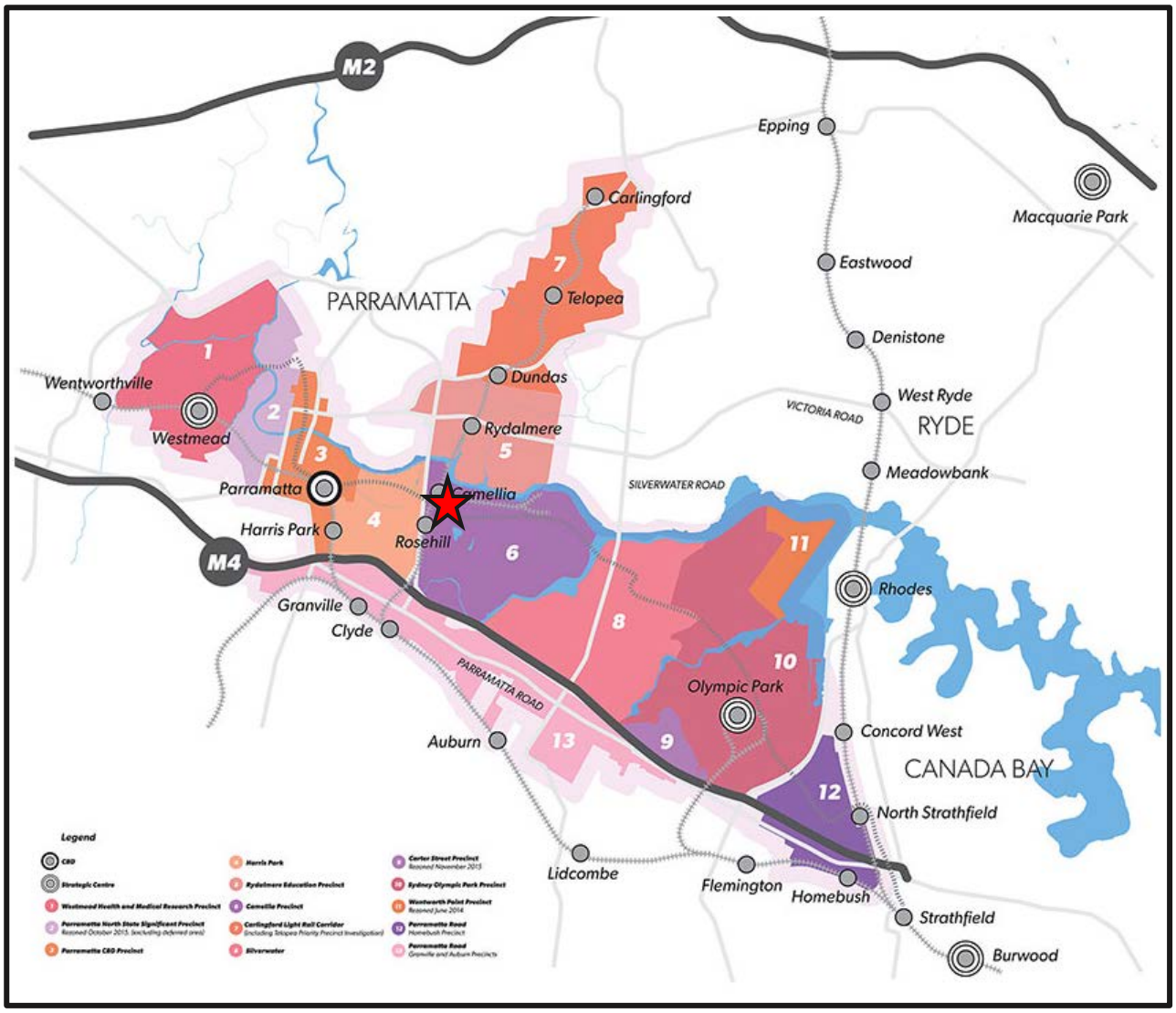

Figure 9 – Greater Parramatta to Olympic Peninsula Urban Renewal Area

The proposed warehouse and distribution centre remains compatible with the existing and desired future character of the Camellia Precinct.

6. SECTION 79C(1) ASSESSMENT

Under Section 79C (1) of the *Environmental Planning & Assessment Act 1979* (EP&A Act), the consent authority is required to take into account the relevant provisions of any environmental planning instrument, draft instrument or development control plan in their assessment of the DA. The following legislation is considered relevant to the proposed development:

6.1. STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE) 2007

State Environmental Planning Policy (Infrastructure) 2007 aims to facilitate the effective delivery of infrastructure across the State by:

a) improving regulatory certainty and efficiency through a consistent planning regime for infrastructure and the provision of services, and
b) providing greater flexibility in the location of infrastructure and service facilities, and
c) allowing for the efficient development, redevelopment or disposal of surplus government owned land, and
d) identifying the environmental assessment category into which different types of infrastructure and services development fall (including identifying certain development of minimal environmental impact as exempt development), and
e) identifying matters to be considered in the assessment of development adjacent to particular types of infrastructure development, and
f) providing for consultation with relevant public authorities about certain development during the assessment process or prior to development commencing.

Assessment: In accordance with section 104 of SEPP (Infrastructure) 2007, the proposed development, being a *commercial premises and industry with a GFA of over 15,000m^2 and access to any road*, triggers the requirement for referral to the NSW Roads and Maritime Service (RMS) for comment prior to determination.

6.2. STATE ENVIRONMENTAL PLANNING POLICY 55 – REMEDIATION OF LAND

State Environmental Planning Policy No 55 states that a consent authority must not consent to the carrying out of any development on land unless:

a) it has considered whether the land is contaminated, and
b) if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and
c) if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.

As the site and surrounding locality have a long standing history of industrial land uses and are identified as containing contaminated soils, the following reports have been prepared by JBS&G Australia Pty Ltd to address the requirements of SEPP55:

- Remedial Action Plan (**Appendix I**);
- Draft Site Environmental Management Plan (**Appendix J**); and
- Human Health Risk Assessment (**Appendix K**).

As noted in the accompanying reports, the subject site is identified as being contaminated, with the source of contaminates included imported fill, past land use and leeching from adjoining properties. The most notable contaminates include asbestos and volatile chlorinated hydrocarbons (VCH).

A principal source of contamination arises from the western neighbour, which was previously operated by Akzo Nobel Chemical factory. Given that the contamination is arising off site, the proposed development seeks to consolidate and isolate the site by placing a marker barrier and overlaying this with approximately 1.5m of virgin excavated natural material (VENM), effectively capping the contaminated soil.

The attached reports conclude to state that, upon remediation, the subject site will be made suitable for the proposed warehouse and distribution use.

6.3. STATE LEGISLATION

6.3.1. Contaminated Land Management Act 1997

The *Contaminated Land Management Act 1997* (CLM) gives the Environmental Protection Authority (EPA) power to investigate, declare and seek remediation of contaminated land.

Site investigations confirm that, inter alia, groundwater leakage from the western neighbour at 4 Grand Avenue has resulted in contamination of the subject site (**Appendix J** and **Appendix K**).

This development application seeks to notify the EPA that the subject site is contaminated with volatile chlorinated hydrocarbons (VCH). Given the source of the contamination is off site, the proposal seeks to cap the contaminated soil, as outlined in the accompanying Remediation Action Plan (**Appendix I**). This level of capping will reduce the vapour emissions to a satisfactory level so that they do not pose a risk to human health. This results in the site being made suitable for the proposed use.

6.4. PARRAMATTA LOCAL ENVIRONMENTAL PLAN 2011 (PLEP2011)

The *Parramatta LEP 2011* is the comprehensive Local Environmental Plan for the Parramatta Local Government Area (LGA).

6.4.1. Zoning and Permissibility (Clause 2.3)

In accordance with the *Parramatta LEP 2011,* the subject site is located within the IN3 Heavy Industry zone.

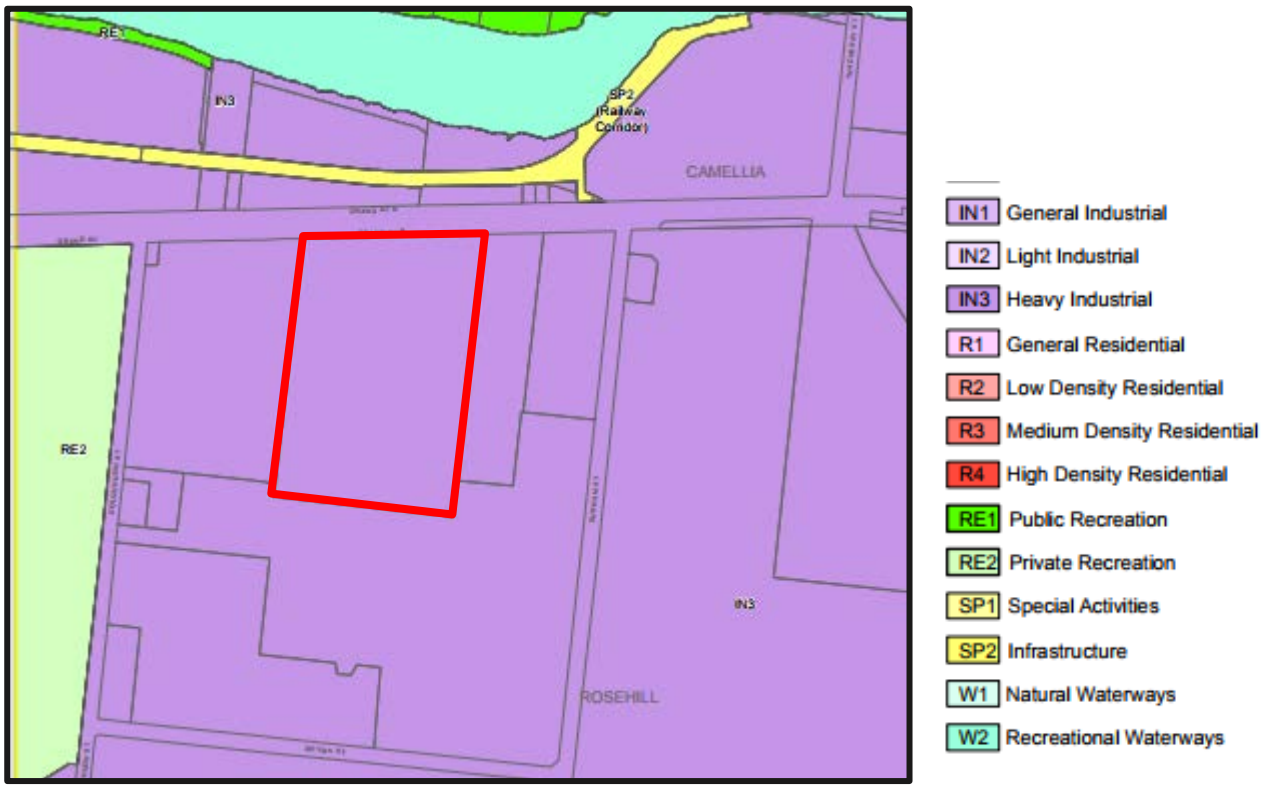

Figure 10 – Land Use Zoning Map

In accordance with the *Parramatta LEP 2011*, the proposed development is classified as a warehouse or distribution centre, which means *a building or place used mainly or exclusively for storing or handling items (whether goods or material) pending their sale, but from which no retail sales are made.*

The proposed warehouse is permitted with consent in the IN3 Heavy Industrial zone.

The relevant objectives of the IN3 Heavy Industrial zone are:

- *To provide suitable areas for those industries that need to be separated from other land uses.*
- *To encourage employment opportunities.*

- *To minimise any adverse effect of heavy industry on other land uses.*
- *To support and protect industrial land for industrial uses.*
- *To allow a wide range of industrial and heavy industrial uses serving the Greater Metropolitan Area of Sydney and beyond.*
- *To ensure that opportunities are not lost for realising potential foreshore access on land that is contaminated and currently not suitable for public access.*

The proposed development is consistent with and achieves the objectives of the zone by:

- generating significant employment opportunities through provision of 5 large warehouse and distribution centres with a combined GFA of 54,795m^2;
- reducing the external amenity impacts through the introduction of a less intrusive industrial activity, in comparison to the existing manufacturing facility;
- retaining industrial land uses within the locality; and
- providing high quality warehouse and distribution spaces to service metropolitan Sydney and beyond.

6.4.2. Height (Clause 4.3)

Pursuant to Clause 4.3 of the *Parramatta LEP 2011*, the subject site is mapped as having an allowable height limit of 12m.

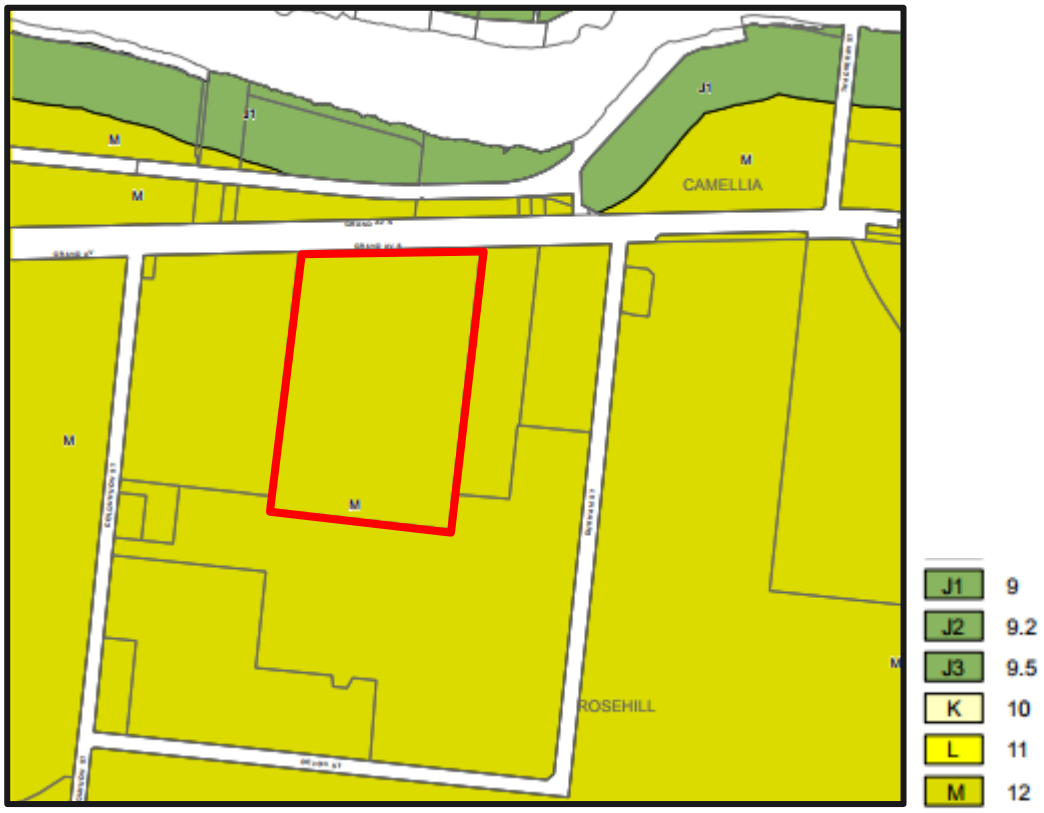

Figure 11 – Maximum Height of Buildings Map

As illustrated in Figure 12 below the proposed development has a maximum overall height of 13.7m which deviates from the development standard by 1.7m or 14.16%.

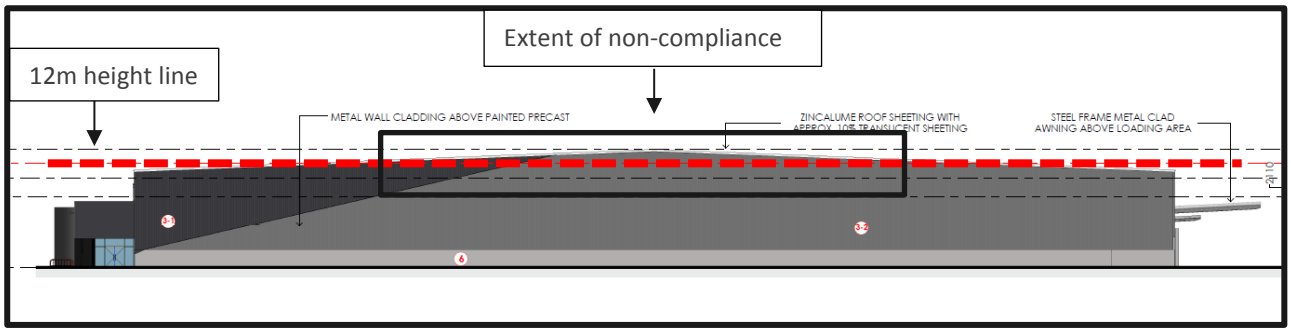

Figure 12 – Elevational Diagram Depicting 12m Height Plane

Due to the contamination that is infiltrating the site and the requirement for below ground on-site detention systems, infill material to a depth of 1.5m is required to enable stormwater to gravity feed to the existing infrastructure along Grand Avenue.

Consequently, the allowable 12m building height is inversely reduced as a result of the natural ground level increasing from approximately RL5.4 to approximately RL 6.9, resulting in a minimum finish floor level of RL7.1.

In this instance, the proposed buildings have a maximum ridge height of 13.7m, which correlates with the depth of infill, as outlined above.

Moreover, the proposed warehouses are required to provide pitched roof forms that are structurally adequate to withstanding extreme weather conditions such as hail storms.

Accordingly, whilst the proposed development has a wall height of 10.3m, the requirement for a pitched roof of 2.25º results in the apex of the roof protruding beyond the 12m height plan, by a maximum of 1.7m. Given the roof pitch runs parallel to the northern boundary, the portion of the roof that protrudes beyond the 12m height plan will not be readily discernible when viewed from a northern/ front or southern/ rear perspective.

It is therefore considered that the proposed development would be perceived as a compliant built form when viewed from the northern Grand Avenue frontage or from properties to the south, as illustrated on the northern elevation provided below.

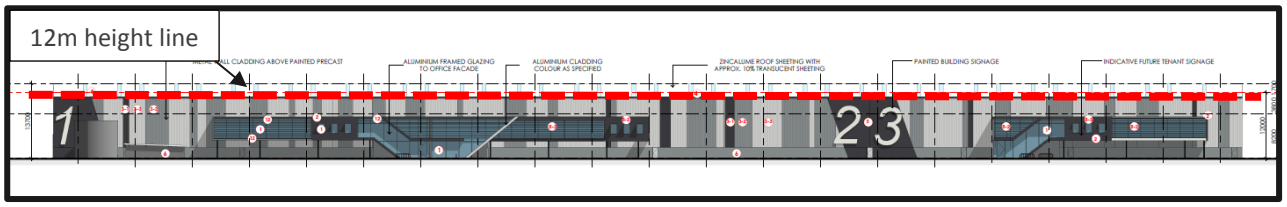

Figure 13 – Northern elevation demonstrating that the proposed development maintains the appearance of a compliant building envelope.

Importantly, notwithstanding the numerical non-compliance, the proposal development continues to achieve the objectives of the development, as outlined below:

Table 5 – Objectives of Height Standard

Objective	Assessment
a) to nominate heights that will provide a transition in built form and land use intensity within the area covered by this Plan,	Complies The proposed warehouse is generally compliant with the 12m height limit as stipulated by the *Parramatta LEP 2011*. Given the buildings have a depth of 113m – 114m, it is considered that the area of non-compliance would

Objective	Assessment
	not be readily visible from a streetscape perspective or from neighbouring properties. Importantly, it is noted that the proposed development has an FSR of 0.64:1, which is well below that permitted on the subject site. The proposed height and intensity provides for an appropriate transition between the subject site and those properties further north, which are encumbered by a 9.5m height limit.
b) to minimise visual impact, disruption of views, loss of privacy and loss of solar access to existing development,	Complies The proposed development is not considered to be responsible for any adverse external amenity impacts beyond that of a compliant building envelope. There are no views or outlook to prominent public places that would be disrupted by the proposed built form. The proposed development, being for a warehouse and distribution centre, has no side facing windows or the like which would result in adverse privacy or overlooking impacts to neighbouring properties. As illustrated on the accompanying shadow diagrams, solar access to existing and future developments will be retained, particularly given the substantial rear / southern setback.
c) to require the height of future buildings to have regard to heritage sites and their settings	Complies The extent of Grand Avenue which runs along the sites northern frontage is identified as being of local heritage significance (Item I6 – Tram alignment). In this regard, the proposed built form is setback a minimum of 38m from the front boundary, resulting in an adequate degree of separation from the tram line. The separation distance combined with the high degree of landscaping along the sites northern boundary provides for an appropriate relationship between the subject site and heritage item. The proposed height of the built form is therefore considered to be appropriate with regard to the heritage significance of Grand Avenue.
d) to ensure the preservation of historic views	Complies

Objective	Assessment
	It is considered that the proposed development will not obstruct any historic views.
e) to reinforce and respect the existing character and scale of low density residential areas	Not Applicable The subject site is not located within a low density residential area. The character and scale of buildings within the surrounding locality is varied and inconsistent.
f) to maintain satisfactory sky exposure and daylight to existing buildings within commercial centres, to the sides and rear of tower forms and to key areas of the public domain, including parks, streets and lanes.	Not Applicable The subject site is not located within a commercial centre.

The surrounding locality contains a varied mix of built forms which are not consistent in terms of height, bulk, scale and setbacks. Whilst the built form is akin with other large warehouse and distribution centres, it is noted that due to the varied nature and setting of built forms, the proposed development would not appear inconsistent within the streetscape.

The portion of the built form which protrudes beyond the 12m height plane is not considered to be responsible for any adverse external amenity impacts particularly in regard to loss of views or outlook, overshadowing or visual bulk. The lack of external impacts and requirement for the height to accommodate the proposed use, demonstrates that there is no benefit in maintaining the development standard.

In this instance, it is considered that strict compliance with the development standard is unreasonable and unnecessary because the development remains consistent with the relevant objectives of the height standard and does not result in any additional external amenity impacts, beyond that of a compliant building envelope.

A clause 4.6 variation to the development standard is provided at **Appendix A,** which comprehensively justifies the departure from the numerical control.

6.4.3. Floor Space Ratio (Clause 4.4)

Pursuant to clause 4.4 of the *Parramatta LEP 2011*, the subject site is mapped as having a maximum floor space ratio of 1:1, as illustrated below:

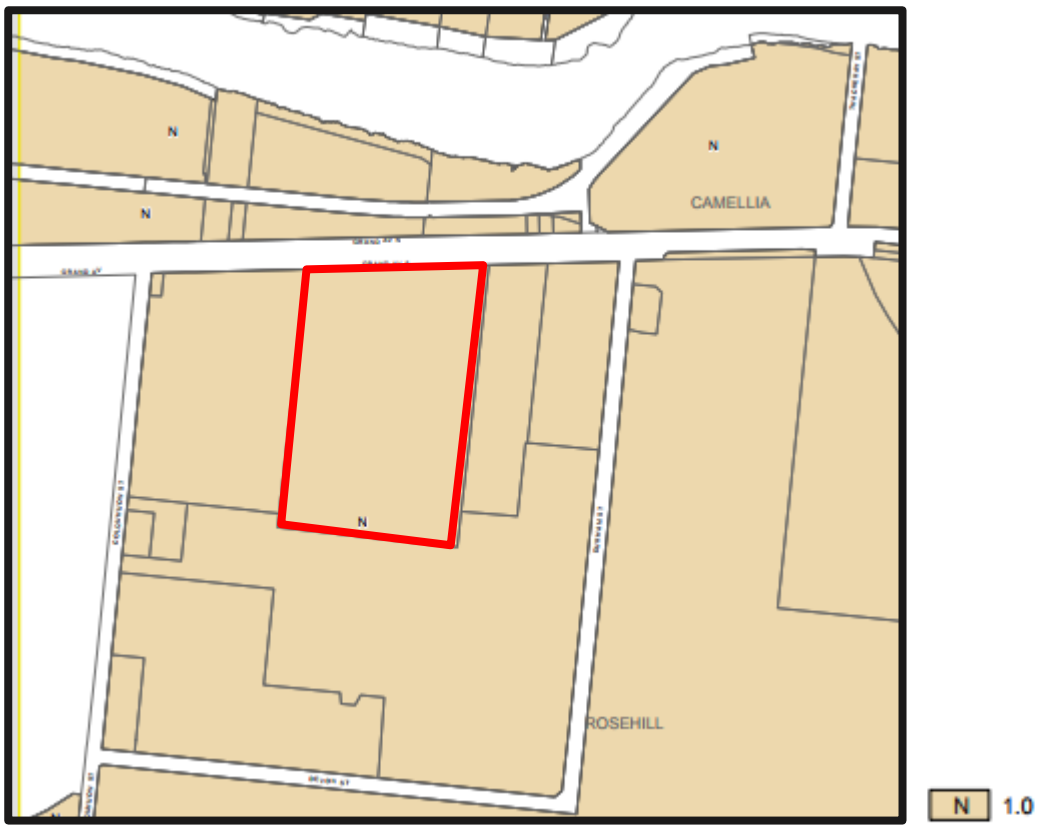

Figure 14 – Maximum Floor Space Ratio Map

As illustrated on the accompanying GFA diagrams prepared by Pace Architects, the proposed development has an FSR of 0.64:1 which is well below that permitted on the subject site.

The proposed FSR demonstrates that the overall bulk, scale and intensity of the development is appropriate for the subject site and surrounding locality.

6.4.4. Exceptions to Development Standards (Clause 4.6)

Clause 4.6(3) of the Parramatta LEP 2011 provides that development may contravene a development standard if the proposed development is consistent with the objectives of the standard and the zone, and a written request has justified the contravention of the development standard by demonstrating:

a) that compliance with the development standard is unreasonable or unnecessary in the circumstances of the case, and
b) that there are sufficient environmental planning grounds to justify contravening the development standard.

The consent authority must also consider:

a) whether contravention of the development standard raises any matter of significance for State or regional environmental planning, and
b) the public benefit of maintaining the development standard.

As comprehensively justified in the accompanying clause 4.6 variation contained within **Appendix A,** contravention of the height of building development standard is reasonable and appropriate on the following basis:

- Leeching of contamination from the western neighbour and the presence of asbestos soils on the site requires the site requires the capping of the existing site. This combined with the requirement to provide underground OSD systems which gravity feed to the Grand Avenue frontage requires 1.5m of infill soil, resulting in the warehouses having a FFL of 1.7m greater than the existing NGL. The raising of the site further exacerbates the building height and directly correlates with the degree of non-compliance;
- Industry standards require warehouses to adopt a pitched roof of 2.25^0 to allow for structural adequacy capable of withstanding the extremities of hail storms and hail loading;

- The proposed building height is not a result of over development on the subject site, given the proposed FSR of 0.64:1 is significantly below the FSR of 1:1 permitted on the site;
- The portion of the built form that protrudes beyond the 12m height plane is not readily visible from a streetscape perspective and therefore it is considered that there are no perceived adverse bulk or scale impacts;
- The surrounding locality contains a mix of built forms that would also departure from the 12m height control. Therefore the proposed development would not be inconsistent with the existing pattern of development nor would it be setting a precedence;
- The circumstances are specific to the site and the proposed development which result in the requirement to vary the development standard; and
- There are no adverse external amenity impacts associated with the variation, including overshadowing, visual bulk or loss of outlook.

Given the lack of external impacts and requirement for the height to accommodate the proposed use, there is no benefit in maintaining the development standard.

6.4.5. Preservation of trees or vegetation (Clause 5.9)

The objectives of this clause is to preserve the amenity of the area, including biodiversity values, through the preservation of trees and other vegetation. The clause requires that development consent be obtained for the removal of trees to which a development control plan applies.

Accordingly, as annotated within the accompanying Arborist Report (**Appendix E**) and Landscape Plan (**Appendix F**), this development application seeks consent for the removal of 94 trees, including those on the subject site and within the road verge (Council owned land).

These trees will be replaced with 149 healthy, mature trees ranging in height from 6m – 30m, with a total of 11,944 plantings proposed on the site, which are native to the locality.

6.4.6. Heritage Conservation (Clause 5.10)

The northern boundary of the subject site adjoins a locally listed heritage item (I6) being the former tram alignment.

It is considered that the proposed works will not adversely impact the heritage significance of the tram alignment along Grand Avenue.

6.4.7. Acid Sulfate Soils (Clause 6.1)

The subject site is mapped as being potentially affected by acid sulfate soils class 4.

The proposed works do not include excavation greater than 2 metres below the natural ground level and therefore no further assessment is required.

6.5. PARRAMATTA DEVELOPMENT CONTROL PLAN 2011

Parramatta DCP 2011 provides controls and design criteria to achieve desirable development outcomes in line with Council's vision for the wider Parramatta local government area. An assessment of the proposal against the key provisions of the *Parramatta DCP 2011* is attached at **Appendix L.** The assessment finds that the proposed development is generally consistent with the controls in the *Parramatta DCP 2011*.

It is noted that the DCP is a non-mandatory document. Therefore, whilst the controls have been designed to allow for consistency and continuity within the urban fabric, each site should be assessed on a merit basis. In this regard, the proposed development provides for alternative solutions to the following key issues:

- Landscaping and
- Parking.

The following sections expand upon and comprehensively address the requirements of these sections, noting that whilst numerical compliance is not achieved, the development outcome maintains compliance with the objective of the provisions.

6.5.1. Landscaping (section 3.3.1)

In accordance with Part 3.1 of the Parramatta DCP, 10% of the site area is required to be dedicated to landscaping.

The proposed development provides for 3,507m^2 of high quality landscaping, equating to 4.1% of the site area. As outlined within the plant schedule, the proposed landscaping includes 149 healthy mature trees ranging in height from 6m – 30m and a total of 11,944 plant species, native to the local area. This results in a superior outcome in contrast to the existing dire site conditions and results significantly contributions to the future desired character of the area.

The proposed high quality landscaping includes a substantial deep soil planting zone of a minimum of 4.1m along the Grand Avenue frontage which will incorporate medium and large canopy trees which assist in screening the subject site from the public domain and reducing the bulk and scale of the built form. New street trees will also be planted in replace of the existing poorly condition trees which will further contribute to a dense, high quality landscape buffer.

A 2.5m wide contiguous landscaped strip is provided along the rear boundary, suitably screening the southern neighbour and contributing to the establishment of a vegetation corridor.

Additional trees and landscaping will be incorporated within the parking islands, softening the appearance of the hard stand nature of the car park, providing increased shade and promoting infiltration to reduce stormwater run-off. Landscaping is also provided within the 1m-1.5m verge along the entirety of the eastern and western side boundaries.

The communal open space areas ancillary to the office space will also be screened with suitable small to medium scale landscaped planting which will further define these areas and provide for a pleasant open space area, notwithstanding the industrial nature of the site.

The dense high quality nature of the proposed 11,944 plants along the periphery of the site and within the ensures that the numerical non-compliance would not be perceived.

Importantly, it is noted that if the proposed development were to incorporate greater landscaping, this would further reduce the availability of onsite car parking. The nature and use of the site, being for a warehouse and distribution centre, requires significant internal road ways to support the movement of heavy rigid vehicles. In this instance, those roadways compromise the ability to provide a greater level of landscaping.

Furthermore, the contaminated nature of the subject site and limitation of remediation options due to the source of contamination being offsite, the provision of basement parking is not feasible on the site. Therefore the proposed development is required to provide at grade parking, which is typical of industrial developments.

It is also noted that the proposed development has a site coverage of 61%, demonstrating that the proposed variation is not due to the overdevelopment of the subject site but much rather, due to the onsite requirements associated with the use, the requirement for a significant degree of on grade parking, in addition to the existing site constraints.

In any instance, the high quality landscaped design is considered to comply with the objectives and the intent of the control and significantly improves upon the existing appearance of the subject site. This has been achieved through the provision of substantial continuous deep soil zones along the front and rear boundaries of the site providing both privacy and amenity, provision of landscaping at intervals throughout the car parking areas and high quality landscaped communal open space areas.

The proposal incorporates a dense range of medium and large sized trees along the boundary that softens the visual impact of buildings whilst also contributing to the landscaped setting of the streetscape.

The proposed degree of landscaping is considered to be consistent with other sites in the immediate locality and therefore the proportion of built form and landscaped open space is considered to be commensurate with the surrounding urban context. This confirms that the variation to the landscaping requirement would not result in a development outcome that is inconsistent with the locality.

Camellia and Rydalmere Special Area (Section 4.3.1)

Pursuant to section 4.3.1 of the *Parramatta DCP 2011*, the subject site is located within the Camellia and Rydalmere Special Area. As illustrated on the design control map below, the subject site is identified as requiring a 20m landscaped setback along Grand Avenue.

The proposed development provides for a minimum 4.1m wide landscaped strip that supports 5057 individual plant trees. This, combined with the landscaped verge traversing the northern boundary equates to a depth of approximately 8m.

Whilst this departs from the intended design control, the proposed high quality nature of the contiguous landscaping strip is considered to be adequate in achieving the intent of the design control.

In this regard, the proposed landscaping buffer is of an adequate depth and density to soften the appearance of the built form, reduce dust emissions and provide for a sustainable solution for stormwater runoff. The proposed planting also effectively screens the car park areas and positively contributes to the vegetation, native to the locality.

It is considered that the proposed variation would not result in any inconsistencies within the streetscape, given that adjacent properties provide landscaped buffers of a similar depth. Importantly, the provision of a 20m landscaped setback would significantly compromise the ability to provide an adequate level of on-site car parking which is already below that required by the DCP.

It is therefore considered that the variation to the landscaped setback is appropriate in this instance and would not result in any reduce visual amenity outcomes.

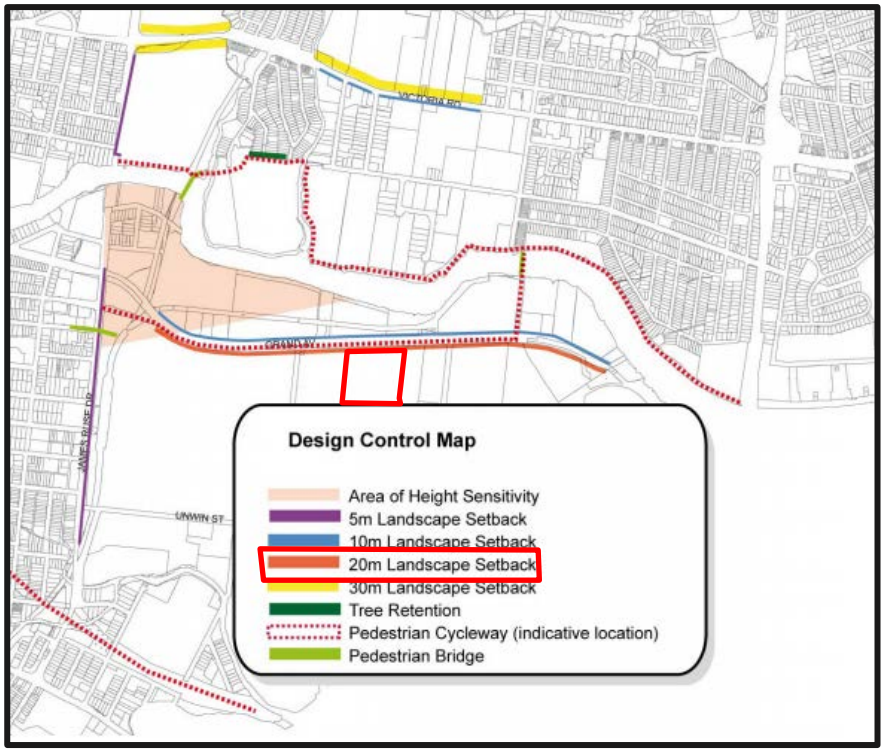

Figure 15 – Design Control Map

6.5.2. Parking and Vehicular Access (section 3.6.2)

Car parking rates

As stated within the accompanying Traffic and Parking Assessment Report prepared by GTA (**Appendix D**), the proposed development provides for 460 car spaces, including 6 accessible car parking spaces.

In accordance with the *Parramatta DCP 2011*, the following car parking rates apply:

Table 6 – DCP Car Parking Rates

Use	size	Required parking rate
Warehouse	49,795m^2	1 space per 70m^2 = 711.35 spaces

Use	size	Required parking rate
Office	5,000m^2	1 space per 50m^2 = 100 spaces
Total required	54,795m^2	811.35 spaces

As indicated above, the proposed development is required to provide 811.35 car spaces which results in a shortfall of 351 car spaces.

However, if the proposed development was assessed against the RMS car parking rates, a total of 292 car spaces would be required, with the development therefore exceeding the car parking requirements by 168 spaces.

The discrepancy between Council's DCP parking rates and the RMS car parking rates is significant, with the proposed development providing a rate commensurate with the use and demand for on-site parking. The adopted approach is considered to result in a sustainable and orderly use of the site, given that the proposed warehouse and distribution centre is not considered to attract a demand for 811 car spaces.

The provision of carparking is based upon the anticipated employee rates and operational procedures, with each warehouse expected to have approximately 15-50 employees on site at any given time. This equates to a maximum of 200 employees across the 5 warehouses, with the parking analysis indicating a demand for 457 car spaces. In this regard, the proposed 460 car spaces exceed the parking required to service the development.

Furthermore, as outlined in *Section 2.4 Transport and Accessibility*, the subject site is ideally located in proximity to a range of established public transportation options, including bus, train and ferry, as well as being connected to active transportation corridors.

The site will also be serviced by the proposed Parramatta Light Rail project, which is understood to commence construction in 2018.

In accordance with the Section 4.3.1 of the *Parramatta DCP 2011*, a Travel Plan will be prepared and submitted to Council prior to the release of the Occupation Centre which outlines the measures undertaken to require the reliance on private vehicular modes of transport and encourage employees to utilise the established public and active transportation modes servicing the site. It is considered that the proposed parking rate aligns with the intent of increased use of sustainable transportation.

Overall, it is considered that the DCP car parking rates are excessive for the proposed use on the subject site and would require a significant proportion of the site to be dedication to onsite parking, therefore reducing the availability of land for deep soil planting. The DCP parking rates do not give regard to the accessibility of sites to public transportation options or various industrial uses and provides a blanket approach. The proposed parking rate is therefore considered to result in a balanced outcome, reflective of the operational requirements of the warehouse and distribution centre.

The proposed parking rates are therefore considered appropriate.

Loading docks

In accordance with the DCP parking rates, the development attracts the requirement for 76 loading docks. On average, this equates to approximately 15 loading docks per warehouse. This is considered to be excessive and well beyond the demand required to service the future warehouse and distribution centre.

Based upon consumer demand, the proposed development provides 5 loading docks per warehouse, with each space capable of accommodating 26m B-Double vehicles.

It is considered that the requirement for an additional 46 loading docks would significantly reduce the availability of areas for warehousing purposes and would serve no benefit to future tenancies, given the lack of demand.

The provision of 76 loading docks on the subject site would result in increased traffic generation that would negatively impacted upon the surrounding road network. Furthermore, the DCP parking rates are not specific to the intend industrial use and are formulate as a guide only.

In this instance, the proposed 30 loading docks is considered appropriate in servicing the warehouse and distribution centre, particularly given it will operate 24 hours a day.

6.6. IMPACTS ON THE NATURAL AND BUILT ENVIRONMENT

Our assessment of the potential impacts of the proposed development upon the natural and built environment, are addressed under separate headings below:

6.6.1. Built Form

Height, Bulk and Scale

Building A and B will have a wall height of 10.3m which inclines to a maximum ridge height of 13.7m, allowing for a pallet racking system plus ceiling clearances, lighting fixtures and fire sprinkles.

Whilst it is acknowledged that the buildings do protrude beyond the 12m LEP maximum building height development standard (see accompanying clause 4.6 contained in **Appendix A**), the variation is required to support the warehouse and distribution use, noting that a minimum roof pitch of 2.25 degrees is required to eliminate potential damage and structural failure caused by extreme weather conditions and severe hail storms.

In any instance, the height, bulk and scale of the buildings are consistent and compatible with other buildings within the immediate locality and do not result in any negative external amenity impacts, beyond that of a compliant building envelope.

The varied nature and scale of industrial land uses and limited perceptibility from any prominent place or residential area ensures that the warehouses will not be visually obtrusive nor will they result in a loss of amenity.

Setbacks

The proposed warehouse and distribution centre is appropriately sited on the subject site to maximise functional requirements, aesthetic value and orientation. In this regard, the buildings are setback from the eastern and western side boundaries by 6.5m, allowing for adequate separation distance to the neighbouring properties.

Building A, is positioned to have a minimum setback of 38m from the Grand Avenue frontage which allows for a high degree of landscaping which is capable of accommodate large canopy tree. Such vegetation will reduce the perceived visual bulk of the built form whilst providing an appropriate balance between built and natural elements.

Similarly, Building B incorporates a 20.7m setback to the southern boundary which also allows for adequate separation from the southern neighbour, preserving visual and acoustic amenity, privacy and solar access.

Internally, a 50m separation distance is provided between the built forms which reduces visual bulk and building mass when viewed from neighbouring properties or the surrounding road network.

Importantly, it is noted that the proposed warehouse and distribution centre is located within a heavy industrial zone and therefore the site is surrounded by buildings of varying height, bulk and scale.

6.6.2. Façade Design, Materials and Finishes

As illustrated on the accompanying architectural plans, the proposed development incorporates a range of materials, colour and finishes which have been designed so that the internal functions are the building are expressed externally allowing for easy recognition of the different site uses (i.e. warehouse, ancillary office space, communal open space). This provides for visual interest, site identification and reduces the appearance of an expansive blank façade, typical of warehouses.

In this regard, the warehouse will be constructed with precast concrete walls and colorbond wall cladding, with vertical panels of grey scale colours, including monument, windspray and shalegrey. The roof will be constructed of zincalume roof sheeting that is approximately 10% translucent.

The ancillary office space incorporates high quality contemporary elements such as aluminium framed glazing, horizontal and vertical louvres and precast concrete walls which allows for easy site recognition whilst also promoting a pleasant and safe entry point for visitors.

The proposed modern design is considered to significantly increase the visual amenity of the subject site and result in a positive contribution to the industrial locality.

6.6.3. Parking, Access and Traffic

Parking

As detailed within the accompanying Traffic and Parking Assessment (**Appendix D**), the proposed development provides for 460 car spaces which have been designed to achieve compliance with the relevant Australian Standards. The parking is commensurate with the demand associated with the proposed warehouse and distribution centre.

The parking rates are appropriate for the site and are not considered to result in any adverse impacts on the built and natural environment. On the contrary, a DCP compliant rate of carparking would significantly reduce the available of land for landscaping and would result in adverse visual amenity outcomes.

Access

Temporary access

During the first phase of development, ingress and egress to the rear of the site (Building B) will be obtained via the existing eastern driveway. A temporary retaining wall will be constructed between stage 1 and stage 2 which supports a 33m wide shared zone to facilitate the B-Double U-turn movement, as illustrated below:

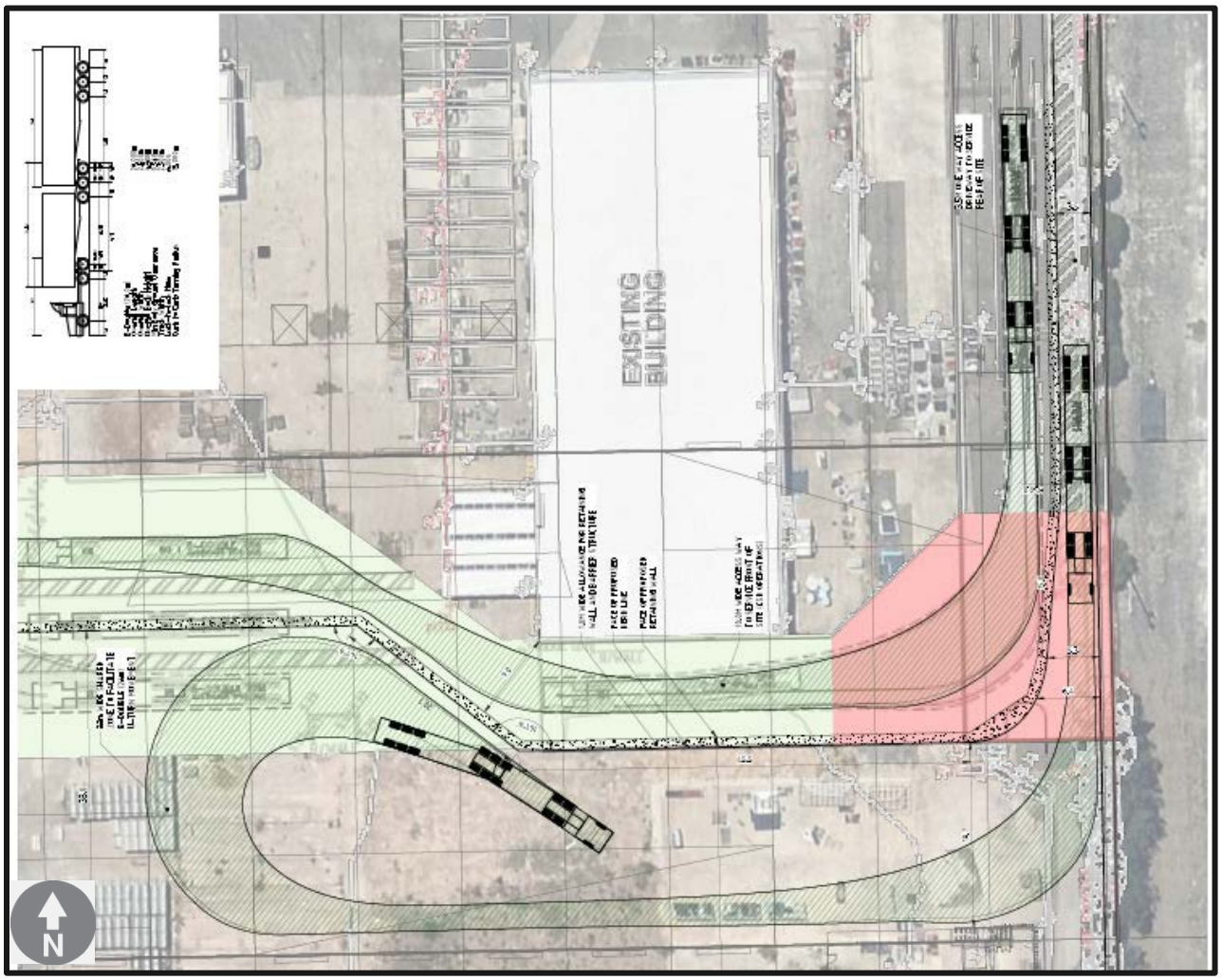

Figure 16 – Temporary Access Arrangement

Permanent Access

Vehicle turning paths and manoeuvring analysis has been provide for the proposed warehouses and their respective loading docks (**Appendix D**).

The proposed development will utilise the existing access points, with ingress provided along the eastern boundary and egress along the western boundary.

Staff and visitors access the northern car park will utilise the existing central ingress and egress points along Grand Avenue.

As stated within the Traffic Impact Assessment, a vehicle management plan will be developed and implemented to management vehicular movements and promote safe pedestrian activity.

Traffic Generation and Impact

As stated within the accompanying Traffic Impact Assessment Report (**Appendix D**), the surrounding road network, including queuing at intersections, would be maintained at a similar level to that which currently exists. Given the warehouse and distribution centre will operate 24/7, the traffic generated by the proposed development will be dispersed throughout the day, with the highest vehicular movements anticipated to occur at non-peak times.

6.6.4. Civil Engineering

Civil Works

The proposed development is accompanied by Civil Engineering drawings prepared by Northrop (**Appendix G**) which provides details for the stormwater arrangements, erosion and sediment control fencing and the gradient of the proposed internal road.

Utility Services

Northrop has reviewed the availability and location of services. Existing and proposed gas, water, sewerage and fire safety services are outlined in the accompanying Hydraulic and Wet Fire Services Brief (**Appendix M**).

Power

The proposed development is accompanied by an Electrical Services Plan (**Appendix N**) which indicates that two (2) 1500 kVA substation kiosks will be required to be installed on the subject site, to achieve the regard electricity demand.

The electricity supply is proposed to be a direct underground service from the substations.

6.6.5. Contamination / Remediation

As detailed in Section 6.2 and 6.3 of this SEE, the subject site is identified as being contaminated with asbestos and volatile chlorinated hydrocarbons (VCH).

As detailed in the accompanying RAP (**Appendix I),** given that the VCH is leeching from the western neighbouring property, the only viable option for decontamination at this stage is to isolate the soil on the site within a properly designed barrier.

The proposed remediation methods are considered appropriate for the proposed development. To ensure the integrity of the proposed remedial works, a draft site Environmental Management Plan (EMP) accompanies this development application (**Appendix J)**.

6.6.6. Waste Management

Demolition and Construction Waste

The Construction Management Plan (CMP) which will be prepared prior to the issue of a Construction Certificate, will incorporate measures for managing demolition and construction waste.

Operational Waste

The proposed development is accompanied by a Waste Management Plan (WMP) prepared by Elephants Foot (**Appendix O)** which demonstrates that the proposal has adequate onsite waste facilities to service the facility.

Given that tenants have not yet been identified, it is unknown at this stage the quantity of waste that will be generated on a weekly basis. Nonetheless, given the industrial and ancillary commercial nature of the

development, waste will be collected by a private waste contractor, in accordance with Council's waste management guidelines.

6.6.7. Construction Management

Overall

A detailed Construction Management Plan (CMP) will be prepared prior to the commencement of works.

Construction Traffic

A detailed Construction Traffic Management Plan (CTMP) will be prepared prior to works commencing on-site.

Construction Noise

The CMP will address the acoustic impacts associated with the construction of the warehouses. It is noted that given the industrial nature of the locality, the nearest sensitive noise receptor is located on the western side of James Ruse Drive.

6.6.8. Acoustic

The proposed warehouse and distribution centre is located within a heavy industrial precinct surrounded by land uses of a similar nature. In this regard, it is considered that the proposal will not result in adverse or obtrusive noise emissions, beyond that consistent with the existing locality.

Moreover, as confirmed within the Pre-DA advice, given that the proposal does not include warehouses for manufacturing purposes, an acoustic report is not required.

6.6.9. Building Code of Australia

The proposed development is accompanied by a BCA Report prepared by Blackett Maguire and Goldsmith (**Appendix P**) which demonstrates that the proposed development is capable of complying with the relevant provisions of the BCA.

6.6.10. Environmentally Sustainable Design and Energy Efficiency

The proposed development is accompanied by a Section J Certificate (**Appendix Q**) prepared by Northrop which demonstrates that the warehouses have been designed to achieve a compliant level of energy efficiency, reducing the reliance on artificial heating and cooling means.

6.6.11. Arborist

An Arboricultural Report has been prepared by Naturally Trees (**Appendix E**), which provides an analysis of the impact of the proposal on trees on the subject site and adjacent to the site boundaries. Table 7 outlines all the trees that may be affected by the proposal.

Table 7 – Summary of Trees for Removal and their Category

Impact	Reason	Important trees		Unimportant trees	
		AA	A	Z	ZZ
Trees to be removed	Building and driveway construction and/or level variations within TPZ	-	36, 47, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 70, 71, 72, 73, 76, 77, 78, 83, 87, 88	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 37,	74, 75, 79, 85, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99

Impact	Reason	Important trees		Unimportant trees	
		AA	A	Z	ZZ
				38, 39, 40, 41, 42, 43, 44, 45, 46, 48, 49, 50, 51, 52, 53, 54, 55, 56, 68, 69, 80, 81, 82, 84, 86	

The site and surrounding area is heavily contaminated due to the long standing history of past industrial and factory uses. It is considered that the existing vegetation is significantly modified, with the trees within the Council verge being poorly lopped under the powerlines, resulting in sparse canopy cover and an unpleasant appearance.

The arborist report supports the removal of the existing vegetation on the site given that it is required to facilitate the proposed development whilst noting that a new landscaping scheme will be implemented that is appropriate for the locality and the proposed use.

It is noted that the trees are not identified as contained threatened flora or fauna species or comprise threatened ecological communities which would require their retention.

6.6.12. Landscaping

As illustrated on the accompanying Landscape Plan prepared by Urbis (**Appendix F**), the proposed landscaped concept has generally been designed in accordance with Council's landscape guidelines. In this regard, the proposal incorporates landscaped species that are native to the local area, with the proposed trees prescribed from the Council specified list.

Water Sensitive Urban Design (WSUD) principles have also been incorporated into the design, with the chosen species being of low maintenance and primarily consisting of low level shrubs.

The plant species have been carefully chosen to form a rich pallet of size, form, colour and texture. The planting is designed to compliment the surrounding locality and help define spaces, such as the communal open space areas, site offices and car parking areas.

6.7. SOCIAL AND ECONOMIC IMPACTS IN THE LOCALITY

The proposed development will positively contribute to the social and economic impacts for the locality as a result of increased employment opportunities and retention of large scale industrial land uses that service the wider area.

The subject site is strategically located for the proposed use given the sites high connectivity to regional and arterial roads which provides for the seamless distribution of goods.

The social and economic impacts are consistent with the desired outcome for the site.

6.8. SUITABILITY OF THE SITE

The site is considered to be suitable for the development for the reasons outlined below:

- The proposed development is permissible with the IN3 Heavy Industry zone,
- The subject site is surrounding by land uses of a similar and compatible nature;

- The proposed development is capable of being accommodated on the subject site following appropriate remedial works;
- The proposal is considered to have no adverse amenity impacts upon the surrounding properties;
- The subject site is ideally located, with an established road network surrounding the subject site, which supports the proposed warehouse and distribution centre use; and
- There are no immediately surrounding sensitive receptors or residential properties that would be impacted by the heavy industrial nature of the development of the 24 hour operation of the site.

Based upon the above, it is considered that the subject site is suitable for the proposed development.

6.9. SUBMISSIONS

In accordance with Section 79C 1(d), public exhibition will occur in accordance with the requirements of the EP&A Act. Comments raised during the exhibition process can be reviewed by Urbis and Billbergia, and a response prepared for Council's consideration.

6.10. THE PUBLIC INTEREST

In accordance with Section 79C(1)(e) the proposal is considered to be in the public interest as it will provide for increased employment opportunities whilst also supporting the continued growth of the Camellia Precinct as a strategic industrial locality which strengthens the role of Parramatta CBD as Sydney's second city.

7. CONCLUSION

This Statement of Environmental Effects has been prepared to accompany the development application submitted to Parramatta City Council in support of the proposed warehouse and distribution centre at 10 Grand Avenue, Rosehill.

This proposal has been considered under the provisions of Section 79C (1) of *the Environmental Planning and Assessment Act 1979.* The proposal is considered acceptable and worthy of approval for the following reasons:

- **The proposal is consistent with State and subregional strategic planning objectives.** The proposal will deliver a high quality warehouse and distribution centre within a key strategic location that has direct connectivity to the Parramatta CBD and key transportation corridors.
- **The proposal satisfies the applicable local and state planning policies.** The proposal achieves high level of consistency with Council's key planning controls. Where the proposal does not fully comply with the numeric provisions, it is considered that the objectives and intent of the numeric provision has been met and therefore achieves compliances.
- **The design responds positively to the site conditions and the surrounding environment.** The proposed warehouse development demonstrates design excellence and uses a variety of materials and finishes to break down the bulk, mass and scale of the warehouses providing for a modern development outcome and visual interest when viewed from within the subject site and from surrounding properties.
- **The proposal is in the public interest.** The subject site is strategically located amongst established transportation corridors, with the development providing significant employment opportunities whilst also facilitating high quality warehouse and distribution spaces that will support the economic growth of Parramatta CBD and Sydney metropolitan area.

In light of the above considerations, the proposed development is considered appropriate for the subject site and surrounding locality and should be approved, subject to appropriate conditions of consent.

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

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