

98-104 Gipps Street Wollongong

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Kennards Self Storage Pty Ltd
C/- MCHP Architects Pty Ltd
SUITE 5 38-46 Albany St
ST LEONARDS NSW 2065

APPLICATION

DA-2018/225

Date

10 May 2018

Dear Sir/Madam

Additional Information Required

We are currently assessing your development application for the following:

| | |
|-------------|---|
| Development | Additional self storage units to existing self storage site, civil and landscaping works, including access bridge |
| Location | Lot 1 DP 1048188, Lot 3 DP 326243, Lot 1 DP 1168799, Lot 2 DP 1048188, Lot 1 DP 1168798 98-104 Gipps Street, WOLLONGONG NSW 2500 |

As part of the assessment, we have identified that the following additional information is required, or matters need to be addressed. Please note these matters are not comprehensive, and further advice will be forthcoming as Council and state government staff complete their review of the application.

To date, the matters requiring your attention are:

1. Department of Primary Industries – Water

The application was referred to DPI Water for concurrence as a controlled activity approval under Water Management Act 2000 is required. DPI Water's correspondence dated 9 May 2018 is attached.

2. Environment

Council has mapped a Category 3 Watercourse as occurring on the site. Chapter E23 – Riparian Land Management of Wollongong Development Control Plan 2009 (WDCP 2009) requires the watercourse to be maintained for bank stability and water quality.

A Vegetation Management Plan (VMP) is required to be submitted. The VMP shall meet the requirements of the Department of Primary Industries – Water (DPI Water) '*Guidelines for vegetation management plans on waterfront land*' available from www.water.nsw.gov.au/water-licensing/approvals/controlled-activity.

The VMP is to be prepared by a person with:

- TAFE Diploma qualifications in Conservation and Land Management (Natural Area Restoration), and/or
- a minimum of five (5) years' demonstrated experience in bush regeneration, or
- degree qualifications in environmental management or ecological sciences with demonstrated experience in bush regeneration.

Please contact Council's environment officer Mr Suri Mora on (02) 4227 7111 if you have any questions regarding the VMP.

3. Stormwater and flooding

- The proposed bridge crossing of the northern tributary to provide access from Stafford Street is unlikely to be supported for the following reasons:
 - Based on the information provided it appears that the proposed bridge would require significant re-grading along Stafford Street to provide acceptable grades transitioning to the proposed bridge levels, which is unlikely to be supported due to impacts on drainage, road/footpath levels, and existing access to properties fronting Stafford Street.
 - It appears that any transition works in Stafford Street would also require filling in a location that appears to be a significant flood flow path during larger flood events, which is likely to alter the flood conveyance function and flood regime within Stafford Street and therefore unlikely to be supported.
 - It appears from a review of correspondence and consultation following the pre-lodgement meeting (PL-2016/32) that the proposal for a bridge located within the public road reserve was generally not supported by Council. It appears that the developer would need to acquire that part of the road reserve containing the proposed bridge in order to resolve this issue.
 - No engineering details showing the proposed bridge and associated transition to Stafford Street have been provided. In the event that the above issues can be resolved, the following additional information would be required to enable further assessment of the bridge proposal:
 - § Details of the bridge including plan, longitudinal section, and cross-sections, showing existing/proposed levels within and adjacent to the watercourse, bridge soffit/deck levels, and details of any handrails/fencing proposed on the bridge;
 - § Details of proposed method of transitioning from existing levels within Stafford Street to proposed bridge levels including longitudinal section and proposed finished surface level design contours; and
 - § Detailed flood impact mapping showing the impacts of the proposed bridge on flooding, inclusive of proposed bridge deck, handrails/fences, blockage, and transition works.
- In the event that the above matters cannot be resolved, an alternative method of safe and reliable flood access will need to be provided to proposed building G.
- Please provide a copy of the catchment plan and WBNM modelling (incl. routing, structures, IFD data, input files (i.e. '.wnb' files) and WBNM results used in the hydraulic model. Based on review of the catchment plan and WBNM model used in the catchment wide study, it appears that sub-catchment 9001 was incorrectly routed to sub-catchment 8050, whereas sub-catchment 9001 actually flows into sub-catchment 9000. This error must be rectified in the WBNM modelling and flood study for the subject development.
- The inflow locations used in the flood model do not accurately depict the true extent and behaviour of flooding across the subject site, particularly in relation to flooding from the eastern tributary. The WBNM catchment boundaries, hydraulic model extent, and inflow locations need to be amended to accurately depict flooding from this tributary, and associate flood impacts resulting from the development.
- In connection with the above, based on flood studies recently submitted to Council for a number of developments upstream and adjacent to the subject site, flooding in the eastern tributary is extensive within Gipps Street and through the development site and adjacent properties. The hydraulic model extent and inflow locations shall be extended upstream to

Throsby Drive to accurately depict existing and proposed flood behaviour through the site and flood impacts resulting from the development.

- The model grid size used in the catchment wide study (i.e. a 5 metre grid) is not considered sufficiently detailed for site specific flood modelling and impact analysis. The flood modelling for the development is required to use a finer grid mesh within the site and surrounds to accurately depict flood behaviour and impacts. A grid size of 1 metre is required for the subject site and surrounding area.
- Please provide details of all structures in the hydraulic model including survey, dimensions, invert, obvert, deck levels, span, details of handrails/fences, method of modelling, structure class, and design and risk management blockage factors applied to each structure and any associated hand-rails/fences, for each of the following structures:
 - Northern tributary railway crossing;
 - Proposed bridge accessing Building G;
 - Western tributary railway crossing;
 - Western tributary timber footbridge (downstream of railway bridge);
 - Eastern tributary Gipps Street crossing; and
 - Fairy Creek Flinders Street bridge crossing.
- In connection with the above, it is unclear whether any changes to surface levels have been incorporated into the modelling of the proposed bridge to reflect required transitions from bridge deck to existing surface levels in Stafford Street. In this regard, any further proposal for a bridge crossing must include details of the proposed transition and how the proposed transition levels have been included in the hydraulic modelling.
- It is unclear whether flood modelling is based on current catchment conditions, including changes to finished surface levels that have occurred since the completion of the Fairy & Cabbage Tree Creeks Flood Study dated 2009, including recent developments such as on the existing Kennards Self Storage facility and adjacent Dan Murphy's development. In this regard, the flood study must reflect current catchment conditions.
- The flood planning for the development does not make allowance for climate change in accordance with the recommendations of Council's adopted Fairy & Cabbage Tree Creeks Floodplain Risk Management Study and Plan (FRMS&P) dated 2010. Refer to measure No. 2.4(6) of the adopted risk management plan, which was a High priority measure. In this regard, the flood levels used for flood planning of the development shall be increased to allow for climate change in accordance with the recommendations of the adopted FRMS&P.
- The report addressing stormwater/flooding controls for the development does not address potential floodplain storage impacts during the PMF event. As per Sections 6.4.2(d) and 7 and Chapter E13, and Section 11.2.1 of Chapter E14 of the Wollongong DCP2009, both the 100 year ARI and PMF flood events must be adopted to address flood impacts associated with filling in the floodplain (i.e. PMF extent). In this regard, filling within the floodplain is generally not permitted unless it can be demonstrated that there will be no cumulative impact as a result of similar filling on other development sites in the catchment. In this regard, the section titled 'Flood Storage' in the report by Northrop shall be amended to include pre and post development flood storage volumes for the PMF event, demonstrating no net reduction in floodplain storage on the site during the PMF.
- The stormwater strategy attempts to replicate the function of the existing OSD facility by calculating existing OSD storage volume from the existing survey, with a calculated existing OSD volume of 178m³. However, a review of Council's records indicates that the development consent for the current use (i.e. DA-2008/829) required re-grading of the existing OSD pond to provide a minimum of 322.49m³ of storage. Refer to stamped plans for DA-2008/829. Also, it is unclear whether the proposed stormwater system maintains the existing tributary catchment area draining to the OSD facility, as per its design. In this regard,

the design shall be amended to replicate the function of the existing OSD facility as approved (DA-2008/829) maintaining the design tributary area draining to the storage.

- The proposed design is contrary to the requirements of Section 11.3.17 of Chapter E14 of the Wollongong DCP2009, relating to overland flow from adjoining properties. In particular, the proposed building and fill along boundary adjoining 106 Gipps Street (Lot A DP 421251), and elevated surface levels within the site, will obstruct surface runoff from the adjoining land. The design shall be amended such that finished surface levels adjoining the property boundary and within the flow path through the site are no higher than existing ground levels along the boundary, and proposed buildings shall be provided with a suitable offset from the upslope property boundary, to enable acceptance and conveyance of all contributing runoff wholly within the site. The diversion of this overland flow to the street, the rear of the subject property or in any other direction other than that in which it would naturally flow will not be permitted.
- The plans shall be amended to comply with Section 13.1(1)(b) of Chapter E14 of the Wollongong DCP2009. The extent and area (in plan) of the upstream catchment for external flows entering the site shall be provided on the stormwater concept plans. This must include all parts of 106 Gipps Street (Lot A DP 421251) that contribute to the site in existing conditions.

Please contact Council's stormwater engineer Mr Mathew Carden on (02) 4227 7111 if you have any questions regarding the stormwater and flooding.

4. Landscape

- It appears that the tree removal and retention plan has not been coordinated with the proposed drainage design. It appears that proposed stormwater infrastructure may conflict with existing trees proposed for retention.
- It appears that the tree removal and retention plan has not been coordinated with proposed bulk excavation and fill plan. It appears that proposed cut and fill plan may conflict with existing trees proposed for retention.
- The proposed tree removal 1-89 and 90-105 is not supported. The justification to remove the trees to stop pine needles falling on to the road pavement cannot be supported. Council has no objection to removal of trees in poor structural condition or trees conflicting with water hydrants.
- The proposed tree removal 255- 305 is not supported. These trees provide a visual screen and they are considered a material design constraint and the design should be amended to retain these trees.
- Tree protection measures to be implemented during the demolition and construction stage are to be described within the Statement of Environmental Effects as well as indicated on the site plans and the demolition plan.
- The landscape concept plan must show all existing trees on site accurately plotted, species identified and numbered to correspond with the arborist report. Clearly show which trees are to be retained or removed. Compensatory planting will be required for the trees removed.

Please contact Council's landscape architect Ms Danielle Pollock on (02) 4227 7111 if you have any questions regarding landscaping matters.

5. Traffic and Parking

- The operational car parking for the proposed storage use (as per the existing arrangement) is accepted within the aisles which are closer to the lifts and trolleys for self-storage loading and unloading. However, the Traffic Impact Assessment (TIA) found that there would be a requirement for a further two 'customer spaces'; for customers picking up boxes etc. The customer spaces are used by potential new customers viewing the storage facility and signing up for a storage unit in person as well as for picking up packing materials, tape, boxes etc., and is located outside the secure area (accessed via keypad).

- The development must provide an additional two customer spaces outside the secure area so that new and existing customers are able to access the office during business hours.
- The TIA surveys of the existing facility found that on occasion, staff had to park on the street when these spaces were full which indicates that additional customer car parking needs to be provided for the additions.
- It is noted that swept paths for a range of large vehicles up to a 19 metre articulated vehicle have been shown entering and exiting the site from Gipps Street in a forward direction. However the swept path assessment for the northern part of the site accessed from Stafford Street only allows for access by an 8.8 metre Medium Rigid Vehicle. In view of this, the development will need to include measures to prevent drivers of larger vehicles from entering the site from Stafford Street and being unable to turn and exit in a forward direction. A Management/Servicing Plan would be required as well as signage to prevent access by vehicles longer than 8.8 metres.

Please contact Council's traffic engineer Mr Charlie Bevan on (02) 4227 7111 if you have any questions regarding traffic and parking matters.

6. Planning

- The relationship between the proposed four additional buildings and the existing Kennards facility approved under development application DA-2007/829/A is unclear. For example:
 - § will the waste generated by the new building be stored and collected in an existing waste location?
 - § Will the new buildings use the same on-site manager as the existing facility?
 - § Will cars, boats etc. still be stored outside of a building? If so, the location must be specified on the site plan.

The cumulative impacts of the expansion must be addressed.

- The side setback of Building D is inadequate. A minimum setback of 3m is required, in accordance with Chapter B5 of Wollongong Development Control Plan 2009. Council is currently assessing a development application on 106-110 Gipps Street which proposes a residential apartment building within 10m of the shared boundary.
- Confirm minimum setback of Building G from the northern allotment boundary (creekline), and setback of Building G awning to western boundary.
- Consider whether the proposed location of the northern (Stafford Street) gate is suitable. What would happen in the event of vehicles entering the site by mistake, travelling over the bridge only to be confronted with the secure gate they cannot access? Would vehicles be required to reverse back to Stafford Street? There does not appear adequate dimension to allow vehicles to turn around and exit to Stafford Street.
- State Environmental Planning Policy No. 55 Remediation of Land must be addressed in the Statement of Environmental Effects.
- Are any changes to existing boundary fencing proposed, other than the western boundary of Lot 1 DP 1048188?

7. Sydney Trains

The application is required to be referred to Sydney Trains in accordance with clause 86 of State Environmental Planning Policy (Infrastructure) 2007. Your \$320 referral cheque made out to Sydney Trains is outstanding. Until Council receives the referral cheque, the application cannot be sent to Sydney Trains.

8. Roads and Maritime Services

The application was referred to RMS in accordance with clause 104 of State Environmental Planning Policy (Infrastructure) 2007. RMS has advised they do not object to the application.

9. Public exhibition

The application has been publicly exhibited. To date, no submissions have been received.

10. Determination pathway

The application has been registered with the Joint Regional Planning Panel (JRPP). You will be contacted by the JRPP secretariat with a JRPP meeting date when confirmed.

Please submit revised plans and associated documents **by email to** CS_Planning_Applications@wollongong.nsw.gov.au. Please include the application number 'DA-2018/225' in the subject of the email.

You must accurately complete all sections of the attached Lodgement of Additional Information form and return it with the required information.

We will defer further assessment of your application until we receive this information. The period between this letter and either (a) the provision of the additional information to Council or (b) written advice that the information will not be provided, will not form part of the assessment period for the purpose of any appeal, pursuant to Clauses 109 and 112 of the Environmental Planning and Assessment Regulation 2000. Please note that if the information is not received within 14 days, we may refuse your application.

Your application has been sent to other sections of Council for assessment and this may result in more information being sought or additional matters needing to be addressed. A comprehensive planning assessment will be provided when all other referral parties have completed their assessment.

If you have any questions please contact me on the telephone number below.

This letter is authorised by

Anne Starr
Senior Development Project Officer
Wollongong City Council
Telephone (02) 4227 7111

Attach