

SMEC Reference No. 3002823

26 April 2022

Ian Dencker
Yass Valley Council
209 Comur Street
Yass, 2582

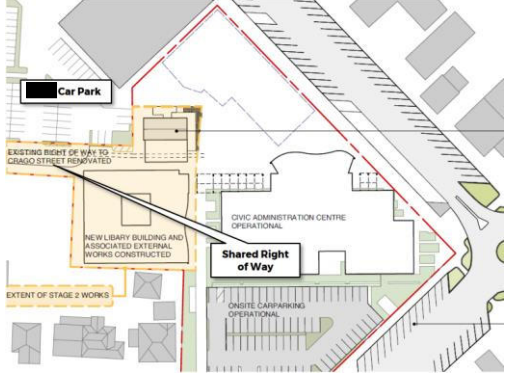
Dear Ian,

RE: DA210262 - Crago Mill Precinct - Public Submissions

We refer to your email dated 23 March 2022, in relation to the abovementioned development application. This letter provides a response to the five public submissions received during the Community Consultation from 31 January 2022 to 28 February 2022. The public submissions and the applicant response are summarised in the below table.

Table 1 | Consolidated public comments and applicant response


No.	Submitted from	Comments	Applicant response
1		<p><i>Section 3.2 of the Statement of Environmental Effects prepared by SMEC dated 11 October 2021 has identified the existing right of carriageway that is part of Lot 100 DP1222562 and states it is used for the purposes of vehicle access to the existing ■■■■ car park.</i></p> <p><i>Whilst the Site and Staging Plan prepared by van der Meer Consulting dated 28 September 2021 does not include the right of way in the staging scope of works, the Site Plan – Staging, Drawing No. A05 in the Architectural Drawings prepared by Brewster Hjorth Architects has identified this part of the site in the Stage 2 Works as the existing right of way to Crago Street will be renovated.</i></p> <p><i>We note that the ■■■■ Store and its customers will continue to use the existing ■■■■ car park on Lot 2 DP 1152503 throughout the redevelopment of the Crago Mill Precinct, with the right of way accessed from Crago Street being the primary access point to the car park.</i></p> <p><i>To ensure that this shared right of way is maintained throughout the redevelopment of the site, we respectfully request that an appropriate condition of development consent be imposed.</i></p>	<p>The existing Right of Carriageway was granted by the former owner of the flour mill (Crago Bros Pty Limited) to provide access for the construction and maintenance of a council-owned sewer asset, which we believe has since been relocated.</p> <p>The development proposal intends to retain a burden over the property for the purpose of vehicular access into the ■■■■ customer carpark. It is suggested that a condition be placed on any consent issued as follows:</p> <p><i>“Prior to the issue of the Subdivision Certificate, a Right of Carriageway 88B restriction shall be drafted to clarify that Lot 2 DP1152503 benefits from a right of carriageway over Lot 100 DP1222562 for vehicular access to the existing at-grade car park.”</i></p>

No.	Submitted from	Comments	Applicant response
			
2		<p>We note that the proposed development does not intend to formally stage the development under Section 4.33 of the Environmental Planning and Assessment Act 1979 (the Act), as amended. However, we understand that the new on-site car parking will be captured in the Stage 1 works as per the Site and Staging Plan prepared by van der Meer Consulting dated 28 September 2021.</p> <p>Should [REDACTED]'s car parking be used by construction personnel, less car parking spaces will be available for use by [REDACTED] Store customers. The reduced availability of car parking for [REDACTED] customers has the potential to have adverse impacts on the commercial viability of the [REDACTED] development through reduced sales and business.</p> <p>In assessing the current DA, we respectfully request that Council include a condition of consent on any Notice of Determination to ensure that construction workers do not use [REDACTED]'s car parking bays at any time whilst carrying out works on the site. The imposition of this condition is necessary to ensure that [REDACTED]'s car parking spaces remain available for [REDACTED] Store customers at all times and there is a transparent mechanism to enforce action if required.</p>	<p>It is recommended that a condition of consent be placed on any approval issued stating <u>"Prior to the commencement of construction (including demolition) suitable on-site car parking facilities or alternative on-street 'work zone' shall be made available for construction workers accessing the site. No construction vehicles are permitted to utilise the [REDACTED] car park for parking during construction."</u></p>
3		<p>Section 3.3.2 of the Traffic Impact Assessment prepared by Genium Civil Engineering Pty Ltd dated 21 September 2021 has made the following conclusion of concurrent trips based on a survey of the usage of the existing Yass library:</p> <p><i>"This supports a reduced car parking demand for the library as some of these visitors will utilise the [REDACTED] or Woolworths car parks in lieu of parking within the Civic Precinct."</i></p> <p>Section 5.6.4 of the Statement of Environmental Effects and the Traffic Impact Assessment provides a detailed quantitative assessment of car parking provision on the site in accordance with the guidelines outlined in the Council policy document ENG-POL-8 – Off Street Car Parking, and the NSW Government's Guide to Traffic Generating Developments.</p> <p>The below table demonstrates that the hybrid parking arrangement of on-site and on-street car</p>	<p>The Traffic Impact Assessment (TIA) shows that the combination of off-street and on-street parking provides sufficient spaces to cater to the projected demand.</p> <p>The TIA recognises that [REDACTED] customers will likely park at and walk from the [REDACTED] carpark to the new precinct (former council site) as they currently do for other business and services.</p> <p>Conversely, other users will park at and walk from the new precinct (former council site) to the [REDACTED] store and other nearby facilities.</p> <p>This concurrent use will likely reduce the overall car parking required in the new precinct which was noted in the TIA, however the precinct currently provides carparking availability in accordance with Council Policy.</p>

No.	Submitted from	Comments	Applicant response																																							
		<p><i>parking exceeds the minimum parking spaces required without the concurrent use of the existing ■■■■■ car park.</i></p> <table><tr><th>Component</th><th>Parking requirement</th><th>Parking spaces provided</th></tr><tr><td>Administration building</td><td>1 space/40m²</td><td>49</td></tr><tr><td>Library</td><td>1 space/80m²</td><td>12</td></tr><tr><td>Commercial Space</td><td>1 space/40m²</td><td>25</td></tr><tr><td>Café</td><td>10 spaces/100m²</td><td>10</td></tr><tr><td>Crago Mill Exhibition Space</td><td>1 space/40m²</td><td>5</td></tr><tr><td>TOTAL</td><td></td><td>99</td></tr><tr><th colspan="2">New parking</th><th>Parking spaces proposed</th></tr><tr><td colspan="2">New off-street car park</td><td>67</td></tr><tr><td colspan="2">On-street car parking (existing and proposed)</td><td></td></tr><tr><td colspan="2">• Cornur Street</td><td>35</td></tr><tr><td colspan="2">• Polding Street</td><td>14</td></tr><tr><td colspan="2">TOTAL</td><td>116</td></tr></table> <p><i>As part of DA No. 5.2008.163.1, 80 at-grade car parking spaces including two accessible spaces were proposed on the ■■■■■ site to reflect the requirements of the RTA’s “Guide to Traffic Generating Developments” in the absence of applicable Council controls the provision of on-site car parking.</i></p> <p><i>Noting that the redevelopment will comfortably exceed current requirements associated with the provision of car parking, ■■■■■ do not endorse the Proponent’s position in the Traffic Impact Assessment as part of the DA documentation that the ■■■■■ car park can cater for parking demand within the new Civic Precinct.</i></p> <p><i>Whilst it is realistic to consider that some ■■■■■ customers may use parts of the new Civic Precinct during their shopping trips, the ■■■■■ car park is required for ■■■■■’s customers to continue to deliver high levels of convenience and accessibility, particularly given the substantial elderly customer base that use the ■■■■■ site.</i></p>	Component	Parking requirement	Parking spaces provided	Administration building	1 space/40m ²	49	Library	1 space/80m ²	12	Commercial Space	1 space/40m ²	25	Café	10 spaces/100m ²	10	Crago Mill Exhibition Space	1 space/40m ²	5	TOTAL		99	New parking		Parking spaces proposed	New off-street car park		67	On-street car parking (existing and proposed)			• Cornur Street		35	• Polding Street		14	TOTAL		116	
Component	Parking requirement	Parking spaces provided																																								
Administration building	1 space/40m ²	49																																								
Library	1 space/80m ²	12																																								
Commercial Space	1 space/40m ²	25																																								
Café	10 spaces/100m ²	10																																								
Crago Mill Exhibition Space	1 space/40m ²	5																																								
TOTAL		99																																								
New parking		Parking spaces proposed																																								
New off-street car park		67																																								
On-street car parking (existing and proposed)																																										
• Cornur Street		35																																								
• Polding Street		14																																								
TOTAL		116																																								
4		<p><i>Future impacts on ■■■■■ signage</i></p> <p><i>We note that Section 2.3 (Page 4) of the Statement of Environmental Effects has identified a concern that ■■■■■ signage may be obscured from the street as a result of the proposed redevelopment. ■■■■■ may be required relocate the ■■■■■ business identification signage to remain visible to approaching traffic if this occurs.</i></p> <p><i>■■■■■ acknowledge there may be a requirement to relocate existing signage to ensure appropriate business identification. To this end, we request that Council to continue to consult with ■■■■■ Stores to address the potential relocation of signage should this be required.</i></p>	<p>Yass Valley Council will liaise with ■■■■■ in the instance that the relocation of business signage is required.</p>																																							
5	■■■■■	<p><i>The design brief given to the architects appears to have been very conservative. As a result the precinct buildings only meet a functional element. With tokenistic architectural features. They appear to have attempted to incorporate a sense of design on facades with the curved pseudo blade walls but overall, it seriously lacks excitement, creativity or daring. It’s all very boxy, square, and predictable. Yes, there is good natural light and internal volume and space appropriate fit out. But the space isn’t interesting. I can hear the community opinions about it now ‘yes its nice’!</i></p>	<p>The project has been designed around the functional needs of the Council, the project budget, heritage considerations and the character of the town centre. The proposed design will:</p> <ul style="list-style-type: none">— Contribute to the creation of an activated town centre,— Provide for council’s operational requirements,— Conserve the heritage significance of the precinct, by restoring Crago’s Mill and having it as a central feature,																																							

No.	Submitted from	Comments	Applicant response
			<ul style="list-style-type: none"> Respond to the character and scale of the existing townscape through the overall form of the buildings proposed while providing elements that form a dynamic counterpoint, and Create a series of exciting and engaging spaces for community activities both externally and internally.
6		<p><i>My particular concern is the library. Having travelled extensively to many libraries around the globe I find this uninspiring rendition to be lacking in meeting not only current but future generations. Who wants 'nice' in a new precinct?</i></p> <p><i>Why would the youth of this town go there? Please research the power a library can have for a community. Two libraries come to mind in Finland, one in Helsinki one in Tempe in the north. The design of these buildings, amazing, also support a social cohesion policy where the homeless can go and be warm, where children can book music studios to record their tracks, where children have secret nooks and where furniture and spaces mould into the building as a seamless coherent interaction.</i></p> <p><i>So much more could be happening in this space to make it inspirational, conversational and most importantly interactional!</i></p>	<p>The project team had worked closely with Council in developing the brief for the proposed new library. Importantly the new facilities have been designed not to be a book depository but to create an active community facility for Yass. They include significant areas for programmed activities, including technology, learning, and recreation facilities. These program spaces have been designed to meet Council's detailed brief and also be flexible allowing for a range of user activities and experiences.</p> <p>During the Detailed Design phase of the project, we will develop the design to incorporate formal and informal spaces. These spaces will include a diverse range of reader spaces (which may include secret nooks and the like) for library users.</p> <p>A key goal of the design development will be to ensure the final internal design is inspiring and engaging the Community.</p>
7		<p><i>Please take this opportunity to consider Yass as a regional hub in its own right not a satellite suburb of Canberra. Lets stand out, lets stand tall, lets have a precinct that really offers - have you considered the role the information centre could have it was incorporated in an exciting design.</i></p>	<p>The brief developed for this project sought to provide new office accommodation for Council and revitalise an underutilised area surrounding the heritage-listed Crago's Mill. The design has in-built flexibility, to provide adaptive spaces that can be used in the future for a variety of uses, such as a visitor information centre, should such a use be desired.</p>
8		<p><i>The space reflects our Indigenous peoples is missing.</i></p> <p><i>The red brick mill and the interests if the Ngannawal peoples should be the starting point.</i></p>	<p>This input can potentially be applied to the detailed design development for the public realm where there are opportunities for Ngannawal input in pavement design, interpretation, selection of indigenous plant material and public art.</p> <p>The project team has been and will continue to engage with the First Nation community to review how elements can be incorporated that reflect their needs and culture.</p>
9		<p><i>In order to make the building looks interesting – what makes people want to stop and go in other than on Council business? A noteworthy art / sculpture/ water feature installation in the plaza would help.</i></p> <p><i>Some of Roger Buckman's portfolio of ideas (previously presented to Council) might work, for example. And /Or can the Mill be painted /have a large mural that is eye catching?</i></p>	<p>Furnishing of the public domain with public artwork has been incorporated through landscape architectural design. Proposed screening elements comprise punched metal screens with a pattern developed by local artists.</p> <p>More public art elements are considered to be part of the detailed design development of the public realm and can add significantly to the memory and attraction of the overall development. Subject to budgets, this may be</p>

No.	Submitted from	Comments	Applicant response
			included within the on-going development proposals.
10		<i>If either of the above ideas had Indigenous content that would also be of benefit - recognition of an Indigeneity in a Civic complex is essential for inclusion.</i>	The project team has been and will continue to engage with the First Nation community to review how elements can be incorporated that reflect their needs and culture.
11		<i>Similarly, if exhibitions are being held in the Mill, how can their content be shared and communicated before someone steps inside the Mill? Can the external facades of the buildings facing the streets give a better understanding of what can be found inside? - or of the values that drive the development?</i>	Wayfinding and signage within the precinct will be considered during the detailed design of this project.
12		<i>A pedestrian crossing towards Miles Franklin Park would also help with integration with the Bike Park.</i>	Upgrades to pedestrian crossings and access to the site from nearby streets are outside of the scope of this project. This comment has been referred to Council's local traffic committee for consideration. Council plans to develop an Active Transport Strategy in the 2023/24 Financial Year to identify requirements for linkages between public, recreational, residential, and commercial areas within Yass.
13		<i>And is there scope for the plantings to educate about climate wise planting for the community?</i>	Council is working on a tree strategy for the main street and this will inform the final selection of planting for the site. Planting will be included using both native and exotic species that are suited to the climate conditions of Yass. Interpretive signage could be included as an educational tool. Plant species will be selected with climate change first and foremost. The selections can include species better able to adapt to increased temperatures and extreme weather events. For example, species may be indigenous or proven in zones typical of central and western NSW north of Yass. Interpretation of the species selection via digital signage or consultation with local land care or community groups; for example, "Trees for Life" is an important means of communicating this message.
14		<i>And finally, a plug for the community group 'The Giftmakers of Yass' which will need a new venue if the Liberty Theatre is ever re- developed as planned. Can a space be found to accommodate them?</i>	The Yass Civic Precinct has been designed to provide flexible spaces for use by council and community groups, as needed in the future. An objective of the project has been to provide adaptability.
15		<i>Firstly I again state my strong objection to Yass valley Council's actions over two decades of purchasing land surrounding Council and planning what we now see proposed without due process and transparency. Ratepayers have paid over market prices and for many consultants to cover up what was always to be. I am one of many offended by Council's buying of land and plan making and then an 11th hour take it or take it.</i>	This development application has followed the statutory requirements for community consultation.

No.	Submitted from	Comments	Applicant response
16		<i>The current Councillors should be provided with a full cost not just what we spend from here on.</i>	This is not a relevant matter for consideration as part of this development application.
17		<i>In reading the information provided in relation to traffic and parking arrangements in DA 21062 I can find nothing that supports the keeping of the current Comur St loading zone opposite the Telstra building.</i>	The loading zone on Comur Street is intended to be replaced with angled parking to support this development application. The placement and relocation of loading zones is a matter for the Local Traffic Committee, and is separate from this development application. The parking strategy for the Main Street will be considered as part of the Main Street Masterplan, currently underway.
18		<i>Council will remember a few years ago when it changed the parking from loading zone to 2 hr parking on a whim from staff without any community consultation or notification. As Council didn't previously consult surrounding businesses nor the community I can only assume that nothing has been done this time around before a traffic management or parking plan has been hatched.</i>	Refer to above.
19		<i>Council will remember my noisy objections, the finding of lack of process by staff, passing of the buck to Councillors and the changing back to loading zone when voted on by Councillors.</i>	Refer to above.
20		<i>As none of the businesses in the area have been surveyed nor has there been any community survey I would consider no changes are in the wind so can I please be advised that the loading zone will be kept as is as it serves a valuable asset to the towns businesses. Many trucks and light commercial vehicles, including Council, use the zone as a stop to organise deliveries and do business in the commercial area. It has good access and egress and is as safe a spot as one could get. Many trade vehicles with trailers also utilise the zone.</i>	Refer to above. Broad community consultation has been conducted for the master planning and concept design stages of the project. Mr Smith was personally invited to make submissions and to attend briefings on the project.
21		<i>I note that it is proposed to provide connection points for stormwater from properties in Adele Street and agree that this is necessary as stormwater from our property and other adjoining properties in Adele Street is currently discharged to the back of our property and across the Council site. We request that this connection be undertaken by Council as part of the construction works.</i>	The proposal intends to provide a connection through the existing stormwater pipe discharging to the council site. However, the overland flow path is to be provided if there is no existing stormwater pipe.
22		<i>We currently have views toward Adele & Comur Streets through our easterly facing office windows. These windows also provide for natural light to enter the building. We request that any landscaping provided along this boundary be limited in height to approximately 2m which is the height of the existing boundary fence.</i>	The plantings in this zone will take into account views from the adjacent buildings. Given there is an existing fence, we will limit shrub planting to approximately 1.0m in height and select trees so that views are not interrupted, and sightlines are maintained. The intention is to allow both views through managing the tree canopy but will also allow screening where appropriate.
23		<i>The existing timber sleeper retaining wall on Council land adjacent to our eastern boundary is in a poor state of repair and is in need of</i>	The existing retaining wall will be replaced as part of the proposal. However, the details of the

No.	Submitted from	Comments	Applicant response
		<i>replacement. The DA documentation does not provide details of what is proposed for this retaining wall but we suggest it should be replaced as part of the works.</i>	retaining wall will be confirmed during the Detailed Design stage.
24		<i>We note that the proposed garbage enclosure is directly adjacent to our boundary and close to our rear car park and shed. It is also located directly adjacent to one of the main walkways into the site. We are concerned that this will result in odour issues and request that a more appropriate site be identified to house the garbage bins which is not directly adjacent to our property. There appears to be ample space to the east of the proposed carpark.</i>	The proposed waste enclosure will be enclosed when it is not being utilised and waste will be collected on a daily basis to minimise odour issues. The location of the enclosure has been selected to allow good access for all users and sufficient manoeuvring space for collection purposes. There is no verge crossing or space allowed for accessing and turning of a waste truck on the east of the proposed carpark.

We trust that the information provided is sufficient to allow the council to continue its assessment of the proposal. We would appreciate the opportunity to discuss any of these matters listed above should there be outstanding concerns with the proposal.

If you have any questions relating to the information submitted, please do not hesitate to contact me.

Yours sincerely,

Skylar Chan

Experienced Planner

Phone: 02 6234 1975

Email: Skylar.Chan@smec.com