Your ref: MP10_0190 File no: MC-10-2500

8 April 2011

Department of Planning GPO Box 39Sydney NSW 2001

Attention: Mr Daniel Cavallo

Dear Mr Cavallo,

Council comments on Environmental Assessment Wet 'N' Wild, Reservoir Road, Prospect

I refer to your notice of exhibition of the Environmental Assessment for Wet 'N' Wild Sydney, where Council has been invited to review the application and provide comments to the Department of Planning by 8 April 2011. Thank you for the opportunity to comment and for the extension to the submission time.

Whilst Council is generally supportive of the proposed Wet 'n' Wild Sydney Theme Park development at Prospect, it has some significant concerns regarding road network impact and upgrading, parking provision, and heritage issues relating to the site itself and the surrounding Prospect view landscape that need to be addressed in revised Traffic and Heritage Reports to be prepared by the applicant.

These issues relate to requiring the applicant to prepare:

i) A revised Traffic Report which represents the worst case scenario for impacts and reflects all operating hours.

ii) A revised Heritage Report which fully assesses the potential negative impacts on the heritage fabric of the site and visual setting of the surrounding landscape.

Details of both these complex issues are outlined in Attachment 1 to this letter.

Council requests that this further work be undertaken prior to any determination of the Application and that Council be given the opportunity to provide comment on such further reports.

Council objects to any approval being granted to the proposal in the absence of further study work which deals with the issues raised in Council's submission. Further, Council requests that it be advised in writing of the manner in which its submission is taken into account.

Should you require any further information regarding this matter, please contact Council's Manager Development Services and Administration, Judith Portelli on 9839 6228.

Yours sincerely,

Glennys James Director City Strategy and Development

Attachment 1 – Comments

You are advised the following issues are raised which the Department of Planning should consider prior to the determination of the application.

TRAFFIC

Council's Traffic Management Officer has reviewed the proposal and provides the following comments:

The Traffic report has been assessed and a number of issues have been identified that require further clarification. These include:

- i. Assumptions made n the traffic modelling.
- ii. The lack of information concerning potential major events at the site.
- iii. Information pertaining to the network upgrade. Whilst it is understood that the applicant and the RTA have come to an agreement on the scope of the upgrade, the extent of these works is not detailed in the Traffic Report, nor has Council been party to discussions on the matter.
- iv. There is no information on the upgrade of Reservoir Road, apart from the improvements at the proposed access to the site.

These issues are covered in more detail below.

Forecast Trip and Traffic Generation

Prospect Aquatic Investments has developed detailed daily attendance forecasts by drawing on surveys of existing similar developments including Wet 'n' Wild Gold Coast. Experience from Queensland has been adapted according to local Sydney conditions in order to determine probable traffic generation.

Person Trip Generation

- The transport assessment is based on the "Shoulder" period described in Table 6 and Table 7 because the report says that it coincides with typical traffic conditions on the adjacent road network in non-school holiday periods. See Table 10 for trip generation calculations based on the "Shoulder" period.
- However the traffic modelling is not based on the "worse-case" scenario which may well be the "Peak Holiday period" which will generate a greater attendance then the "Shoulder" period.
- In any case, for analysis of future scenarios, traffic modelling forecasting should be undertaken based on existing holiday counts, plus the peak "Peak Holiday period" traffic generation.

Hourly Arrival/Departure Profiles

• The transport assessment is based on a 6pm closing time. The report indicates that this is so because it represents the worst case situation with departures more concentrated. However, closing time may be as late as 11pm. Further, it is possible that "events" attached to the music zone with capacity for live performance, may create conditions which are far more concentrated then which has been allowed for in the analysis.

Traffic Attraction / Distribution

- Table 11 of the Report describes the traffic attraction / distribution based on where the development will attract visitors from within the Sydney metropolitan region. In the Report, traffic generation has been divided into 5 'origin' regions, Sydney Central (attracting 37.8%), Sydney South (18.1%), Sydney North (17.5%), Sydney CBD / East (15%) and Sydney West (11.6%). Given the location of the development in the Sydney West region, the fact that this region will contribute the least amount of customers than all regions in Sydney seems surprising. It would seem that the figure of 11.6% for Sydney West is an underestimation.
- Figure 14 describes the traffic distribution on various roads based on the forecast traffic of Table 11 (discussed above). Given that the traffic generation would appear to be an underestimation from Sydney West, it is likely that the traffic distribution model of Table 14 has underestimated the amount of traffic likely to use Reservoir Road (2%) and Prospect Highway (4%). It is likely that a large percentage of customers from the Blacktown LGA, as well as some neighbouring LGA's would use roads other than the M4. Further, no traffic has been distributed to Reconciliation Drive, which will provide access to Greystanes and Fairfield in the near future. Further, it is likely that people from Fairfield and Liverpool may well use Ferrers Road-Peter Brock Drive-Reen Road to reach the site rather than the M7 (to avoid using the tolled road).
- It is preferable that details of the traffic model used to forecast traffic volumes be included as an attachment to the report. In particular, no information has been made on the raw traffic volumes predicted under the traffic model, or details of many of the assumptions used to develop the model.

Events and Generation

- The Daily Attendance Forecasts (Table 7) in the peak period may range on average up to 9,000. However, a crowd capacity for the proposed site is not specified in the report.
- It should be noted that larger Special Events are regularly held at the nearby Eastern Creek International Raceway and Sydney Drag Way venues.

- Primary access to the Eastern Creek venues is via the M4, Reservoir Road, Reen Road and Peter Brock Drive. During Special Events, there can be significant queuing on all the access roads, including back onto the M4. This has not been analysed as part of the report.
- Council would especially have concerns with the impact on regional roads of parallel large 'events' being held at both Wet 'n' Wild and Eastern Creek Motor Precinct.

Transport and Accessibility Impacts

Intersection Modelling

- Five intersections have been modelled for performance:M4 eastbound / Prospect Highway, M4 westbound / Prospect Highway, M4 eastbound / Reservoir Road, M4 westbound / Reservoir Road and Reservoir Road / Reconciliation Drive.
- Council also has concerns that the development will have an impact on a number of intersections that were not modelled as part of the Report, but which will be impacted upon. These include: Great Western Highway / Reservoir Road, Reservoir Road / Reen Road, the new site access road / Reservoir Road, Ponds Road / Prospect Highway and Prospect Highway / Great Western Highway intersection.
- The Report indicates that the modelling of the 'existing' scenario for the M4 Westbound / Reservoir Road intersection is based on the M4 westbound off-ramp having priority (through a Give Way sign). This is currently not the case as the Reservoir Road approach has priority.
- There is no mention in the report if any provision has been made in the modelling for the linking of Reconciliation Drive with the Fairfield area.
- Table 9 of the Traffic Report indicates that the traffic modelling assumes that 85% visitors arriving by car, with 15% arriving by bus. This assumption of 15% arriving by bus would appear to be an overestimation of the real number likely to travel by bus. Thus the number of vehicles estimated in the traffic modelling is likely to be higher than this report indicates.

Intersection Upgrades

 The Report notes that full signalisation of the 2 roundabouts on Prospect Highway at the M4, in addition to widening of the bridge over the M4, is one possible solution to address current capacity constraints. Capacity at these two intersections is at or nearing saturation. Whilst Council supports signalisation and bridge widening, these needs to be confirmed and should be insisted upon by DOP. In addition, there is no proposal for further upgrade of Prospect Highway.

- Council requests signalisation of Ponds Road / Prospect Highway due to severe capacity constraints at this location, widening of Prospect Highway bridge over the M4, possible duplication of the Prospect Highway bridge over Great Western Highway and also signalisation of the Great Western Highway / Prospect Highway intersection to enable all turn movements to occur between these 2 major roads. No analysis is completed for these intersections as part of the Report.
- Council requests that consideration be made to upgrade the additional intersection control at Reservoir Road / Reen Road, particularly as this road provides an alternative parallel access from Fairfield to Wet 'n' Wild which is not via a toll road. This intersection should be configured to have at least dedicated turn lanes however preferably would be upgraded to a roundabout control. No analysis is completed for this intersection as part of the Report.
- Council supports the upgrade of the intersections of M4 eastbound / Reservoir Road and M4 westbound / Reservoir Road, and to include the provision of a right turn movement from Reservoir Road northbound to M4 eastbound. The Report indicates that the M4 / Reservoir Road interchange is currently performing at a good level of service at all times.
 Council disputes these findings with excessive delays often reported queuing back onto the M4 from the westbound off-ramp. The Sidra modelling for this intersection for the 'existing' scenario has incorrectly be shown as having the priority for the M4 off-ramp when Reservoir Road has the priority at this T-intersection. This means that the existing Level of Service is likely to be worse than reported.
- In any case, the Report notes that consideration is being made to signalise the M4 Westbound / Reservoir Road and M4 Eastbound / Reservoir Road intersection due to safety considerations. Whilst Council supports this proposal. This needs to be enforced and should be insisted upon by the DOP. Council has lobbied the RTA for several years for an upgrading of the M4 westbound / Reservoir Road intersection due to safety concerns. The RTA has written to Council to confirm that the intersection will be reconfigured to give the M4 off-ramp priority due to acknowledged safety concerns, however with additional traffic volumes expected due to the development, traffic signals would be required.
- It is also noted that under the current M4 westbound / Reservoir Road intersection configuration, there is no storage capacity for the right-turn movement from Reservoir Road to the M4 Westbound ramp.
- Section 6.1.2 of the Report states that an upgrade (to traffic signals) elevating the Reservoir Road / M4 interchange to a higher order interchange, "is unlikely to be considered if a significant upgrade of the M4 / Prospect Highway interchange occurs" (page 31). Council does not support this position of having only one preferred access from the M4 as it is likely that traffic from the east will use the Prospect

Highway exit from the M4, and that traffic from the west, north-west and south-west will continue to use the Reservoir Road exit from the M4. This view is supported in Figure 14 of the report which indicates a traffic distribution split of 50:50 between accessing the site from the east and west. Consequently, the upgrading of the Reservoir Road / M4 interchange is considered necessary for safe and efficient access.

• There may be a need for the upgrade of the Reconciliation Drive / Reservoir Road intersection to traffic signals depending on the increases in traffic volumes associated with the new link connecting Reconciliation Drive to Fairfield. Such an upgrade is supported by Council.

Road Network Upgrade

- Whilst it is understood that the applicant and the RTA have come to an agreement on the scope of the upgrade to the higher order road network, the extent of these works is not detailed in the Traffic Report, nor has Council been party to discussions on these matters.
- The report does not indicate improvements to Reservoir Road. Council considered the provision of an upgrade to the section of Reservoir Road between the M4 off-ramp at Reservoir Road and Reconciliation Drive, from a rural road to a "higher order road" which may act as a sub-arterial road in the future, as essential as the current road pavement would not sustain the traffic levels forecast.
- Access to the service vehicle area and staff parking area will be from Watch House Road and the Reservoir Road / Watch House Road intersection. Consequently, Council supports the provision of an upgrade of Watch House Road. Additionally should Manning Street have some form of access consideration should be given to upgrading this road from a rural road to a higher order road.
- The upgrade of Reservoir Road, Watch House Road and Manning Street are required to meet the requirements of Councils "Engineering Guide for Developments".

Proposed Ingress/Egress Arrangements

- The proposal is for the entrance to the proposed development to be via a signalized intersection on Reservoir Road. Council supports this proposal however the report does not provide an assessment of the operation of this intersection. Consequently, sufficient capacity should be provided to address peak loads.
- Pedestrian lanterns are to be provided on the northern and eastern approaches only, with a pedestrian lantern on the western approach marked as "future pedestrian crossing".

Pedestrian and Cycling Movements

- Council supports a developer contribution to the RTA be made to the upgrade of pedestrian facilities including shared paths along Reservoir Road, connecting to all adjacent RTA and Council regional cycle networks.
- This includes the a contribution be made to construct a cycleway for the full length of Reservoir Road, connecting to the Prospect Reservoir to Blacktown cycleway via Prospect Highway and the Prospect Reservoir to Blacktown cycleway via Reservoir Road, and the Prospect to Fairfield via Prospect Reservoir.
- Table 9 indicates that the traffic modelling provided in the Report assumes only 85% of visitors arriving by private vehicle. This assumption would appear to be an underestimation of the likely number of visitors using a private vehicle. Hence the construction of a well, connected cycleway which links to Blacktown and Fairfield, at the developers cost, is vital if the 85% of visitors arriving by private vehicle assumption is to be met.
- A pedestrian footway or "shared path" be provided from Reservoir Road to the proposed entry gate site.

Parking Provision

- It is noted in the Report that there are no suitable parking codes relating to the number of parking spaces required for a Theme Park. While this is true, information should be provided as to how the proposed parking provision (ie. 1,810 light vehicles, including 42 disabled bays, 12 coaches, 6 minibuses, 20 motorcycles), compares with comparative developments such as Wet 'n' Wild Gold Coast.
- Council will not consider off-site locations such as the Drive-in Theatre as parking provision for the Wet 'n' Wild. This is due to the high likelihood of this site and other adjacent sites being redeveloped in the near future, making them unavailable for parking.
- Further Council supports the provision of a dedicated formalised area for parking which is not subject to be removed based on future expansion of the Wet 'n' Wild site.
- It would appear that the proposed 1,810 parking spaces for the development would appear to be an underestimation of the parking requirements based on the projected traffic modelling. The proposed car park provision is based on sufficient capacity to accommodate forecast peak "Shoulder" period parking numbers, yet this should be based on the worse-case scenario which is the "Peak Holiday" period.
- Further, based on Table 9 of the Report which forecasts vehicle occupancy of 3.0 people per vehicle, it would appear that a maximum of only approximately 5,500 people could be accommodated in the proposed car park, with a further 15%, or approximately 1,000 people

using buses. This is less than the 7,700 Forecast Daily Attendance likely in the 'Peak holiday' period. This is a deficit of approximately 350-400 parking spaces.

- Further, the Forecast Daily Attendance range in the Peak Holiday period may be as high as 9,000. It is also not clear if Special Events (such as Movies or Concerts) could attract greater than 9,000 visitors at a time, and thus the parking deficiency could be greater.
- Council supports the provision of adequate 'Kiss & Ride' area within the proposed site.
- Council supports the addition of disability parking meeting the RTA guidelines.

Proposed Internal Car Park Layout

- Aisle width, carparking dimensions, sight distance at driveways, swept path movements and other parking facilities shall be designed to meet Australian Standards AS2890.1-2004, AS2890.2-2002 and Council's DCP.
- Little information has been provided on average patron visit time and circulation time for vehicles manoeuvring within the car park.
- Council recommends option such as Park Assist technology, car park guidance systems, VMS technology.
- Lighting within the car park area should meet Australian Standards AS/NZS 1158 and associated standards for street lighting of car parks.
- Council recommends CCTV camera technology be provided to assist with security within and adjacent to the car park.

Buses

- It is proposed that the internal car park make provision for up to 3 buses, 12 coaches and 6 mini-buses. The provision of all such vehicles on-site is supported.
- It is however noted that Council supports the installation of a formalised indented bus bay, with kerb and guttering, bus shelter etc which meets the 'Guide to Accessible Bus Stops', to be located on both sides of Reservoir Road, to cater for future public bus services.
- Council does support shuttle bus service provision from Blacktown Station for both staff and visitors, in order to reduce traffic and promote the use of 'green' transportation to the proposed venue. Table 9 of the Report says that the traffic modelling provided in the Report assumes 15% of visitors arriving by bus. This assumption would appear to be an

overestimation of the likely number of visitors using a bus. A frequent shuttle bus from Blacktown Station should be provided at the developer's cost, in order to meet the above assumption.

CONCLUSION

It is noted that the proponent and the NSW Government have come to some agreement so that an agreed contribution is paid to the RTA for the upgrade of the road network surrounding the proposed development. As the supporting documentation has not identified the specific improvements to be made, Council cannot make an assessment of the sufficiency of the proposed network upgrade until it is privy to the agreement between the proponent and the RTA. Council requests further details be provided outlining the RTA's scope of work before commenting further. However, as a starting point, in order to deliver a sufficient network surrounding the site Council suggests the following measures and upgrades be required:

- 1) Capacity: Cap on the capacity of the site to no more than 9,000 visitors.
- Special Events: Restrictions on the approval of major Special Events to comply with Council regulations including restrictions on running parallel events with the nearby Eastern Creek Motor Precinct.
- 3)Intersection Modelling: Traffic modelling be reviewed to reflect the traffic generation and assignments identified in this report and a revised Traffic Report be prepared.

4) Intersection Upgrades:

- i. Reconciliation Drive / Reservoir Road a developer contribution be made to the upgrading of this intersection to traffic signals.
- ii. M4 westbound ramp / Reservoir Road an upgrade to traffic signalisation.
- iii. M4 eastbound ramp / Reservoir Road an upgrade to traffic signalisation.
- iv. Reen Road / Reservoir Road an upgrade to roundabout.
- v. M4 westbound ramp / Prospect Highway an upgrade to traffic signalisation.
- vi. M4 eastbound ramp / Prospect Highway an upgrade to traffic signalisation.
- vii. Widening of the Prospect Highway bridge over M4.
- viii. Duplication of the Prospect Highway bridge over Great Western Highway.
- ix. Ponds Road / Prospect Highway an upgrade to traffic signalisation.

- x. Great Western Highway / Prospect Highway an upgrade to traffic signalisation.
- 5) **Road Upgrades**: Significant upgrades be made to develop rural roads into higher order roads including Reservoir Road (between the M4 offramp at Reservoir Road and Reconciliation Drive), Watch House Road and Manning Street.
- 6) **Ingress/Egress**: Main access road to car park to be signalised and sufficient capacity be provided to cater for peak loads. All approaches to have pedestrian and bicycle lanterns.
- 7) Cycleways / Pedestrians: Construction of "shared path" cycleway (refer to RTA's NSW Bicycle Guidelines) on Reservoir Road between the western property boundary and Reconciliation Drive. Pedestrian footway to be installed on the opposite side of Reservoir Road adjacent to the property boundary. A cycleway "shared path" be included from Reservoir Road to the main gate. Bicycle facilities including bicycle racks to be provided adjacent to the main entrance.

8) Car Park:

- i. No less than 2,200 permanent and formalised car parking spaces be provided on-site or alternatively adequate justification be provided based on a similar theme park such as the Gold Coast Wet 'N' Wild.
- ii. Provision of sufficient bus, coach, mini-bus parking bays and pickup / set-down zones be provided on-site.
- iii. Provision of sufficient 'Kiss & Ride' drop area be provided on-site.
- iv. Provision of sufficient 'Taxi Zone' area be provided on-site.
- v. Aisle width, carparking dimensions, sight distance at driveways, swept path movements and other parking facilities to meet Australian Standards AS2890.1-2004, AS2890.2-2002 and Council's DCP.
- vi. Park Assist technology, car park guidance systems, VMS technology or service time and circulation time technology be considered for installation.
- vii. Lighting within the car park area to meet Australian Standards AS/NZS 1158 and associated standards for street lighting of car parks.
- viii. CCTV camera technology be provided to assist with security within and adjacent to the car park.

9) Buses:

- i. An indented bus bay, with kerb, gutter, and bus shelter meeting the 'Guide to Accessible Bus Stops', be provided on both sides of Reservoir Road adjacent to the property.
- ii. A permanent and frequent shuttle bus be provided by the developer between Blacktown Station and the site. This should be available for both staff and visitors.
- 10)**Construction Traffic Management Plan :** Be provided to Council for approval prior to commencement of construction of the site.

All intersection and road network upgrades to be in place prior to opening of the proposed Theme Park.

HERITAGE

Council's Heritage Advisor has reviewed the proposal and provides the following comments:

General Comments:

The submission includes sufficient heritage analysis generally, however it fails to carry out any comprehensive visual assessment for the development. Given the impact this development will have on the skyline within an identified Heritage Precinct and visually significant landscape, this is a necessary element in the environmental assessment.

There is a small assessment of views within the site within the Landscape Concept Plan, and some limited comment on impact on external views within the Heritage Impact Statement, as well as some approach Photo Montages included in the Application. However none of these constitute the level of visual assessment that should be carried out for this extent of development, and the commentary does not fully address viewscape and visual landscape issues raised within the Prospect Heritage Study, the Cricketers Arms Conservation Management Plan, or the Prospect Hill Draft Conservation Management Plan, or indicated in the Heritage Branch initial comments on the site.

As a result the development has a high visual impact within the precinct. This can be mitigated by a number of factors as addressed in the detailed commentary below.

The development covers a large site within an area identified as Precinct 1 - Prospect Heritage Study, as having a high historic landscape character, with a high concentration of significant heritage remains, and view lines, which should be protected by planning controls. The Heritage Impact Statement does not

sufficiently address the impact of the development in the context of this assessment.

The protection of the potential Heritage Item "Police Watch House" at the southwest corner of the site should be applauded. Specific measures for the conservation of this building should be included as part of the required works in the development of the site. Consideration should be also given to the provision within the heritage protected site of interpretive information that highlights the former development of the Prospect township along the old alignment of the Great Western Highway.

Identified Aboriginal Potential Artefact sites identified in the Aboriginal Cultural Heritage Study have been preserved within the remnant tree planting areas within the development.

In general the Heritage Impact Assessment while providing a rigorous historical review and Assessment of Significance, has failed to fully assess the potential negative impacts on the heritage fabric of the site and the visual setting of the development. Potential impacts of the development are discussed in detail below.

Heritage Impacts identified:

Impact on Potential Heritage Item – Policeman's Cottage

Further consideration is required to fully establish the impact of the proposed development on the view line between the cottage site and St Bartholomews Church. This could be addressed by a photo montage that enables the actual view corridor to be identified and protected within the proposed development.

It is agreed that the property within the bounds of the curtilage provided by the retaining wall edge to the carpark and entry should be listed as a Heritage Item on the WSP SEPP as a locally significant Heritage Item.

Detailed conservation measures need to be tied to the development to ensure that the cottage is appropriately conserved, rather than subdivided off and left to disintegrate further.

Views from the rear of the Police Watch House will be significantly impacted by the presence of the large carpark in the medium to long distance and the coach parking to the medium distance. As such, additional screen planting or high planting should be provided to the northern boundary of the Police House.

Impact on Archaeological Remains Outside the Immediate Home Yard

The south-west and western end of the site (mostly under the car park) has had continuous semi rural farm development over a period of 130 years, including the Police Watch House and its outbuildings and stables,

and the neighbouring two properties which were developed from at least 1892 when cottages appeared on maps. As such Archaeological remains are likely to remain particularly within the carpark area. The proposed development should therefore outline measures to enable the detection and recording of archaeology relating to the former Victorian farm home sites.

Impact on the Reservoir Road Corridor

It is agreed that the section of Reservoir Road between the M4 intersection at Prospect Highway and Reservoir Road / M4 intersection to the west should be listed as a Heritage Item of within the WSP SEPP.

While the proposal retains and augments the existing remaining trees on the site, the opportunity exists to extend the tree lined character of Reservoir road that exists to the west of the site in association with the Cricketers Arms Hotel area. Given that the recognised roadside character along this section of historic road is either rural or tree lined Cumberland forest, the retention of one or the other should be considered.

The proposed development will remove the rural character of the site completely, meaning that retaining a rural character to the road edge will not be possible. As such, reinstatement of Cumberland forest species trees should be implemented along the road corridor in order to preserve some of the historic character of the road. This will have the double value of screening the development from the remaining bushland and rural character of the landscape.

The Road corridor is currently narrow and has unformed edges. This is in keeping with its now semi rural character, and its older historic route. There is no indication in the proposal as to any proposed upgrading of the road or its verges to provide for the increased traffic flow.

Both Reservoir Road and Watch House Road are road layouts and connections that have been in existence since the beginnings of colonial settlement to the Western Sydney area. As such Archaeology in these areas may reveal remains back to the Cox's Road era. The Prospect Heritage Study (Kass 2005) states :

"Whilst there is opportunity for further investigation, according to the RTA Survey Branch, there has been minimal change to the road as a route since the time of its construction by Cox in 1816. More than likely, it follows an earlier Aboriginal migration and trading track. Due to the landscape having undergone minimal change since its initial use as grazing, there is a higher probability for archaeological artefacts and a stronger likelihood that it will reveal earlier histories, including pre-contact relics".

Impact on Rural / Cumberland Forest landscape

While it cannot be expected that the insertion of a Theme Park within a rural landscape will enable the retention of the rural character, the development has the appearance of a predominantly bright coloured, highly commercial and modified space. In addition the car parking required places a large area of bitumen across the landscape, and requires large areas of topographic change.

The Heritage Impact Statement suggests that the site in itself is too small to on its own be a significant component of the rural landscape. This argument is not supported given the prominence of the site in relation to the highly significant landscape of the Prospect Reservoir, St Bartholemews Church and its recognition as the most important remaining semi rural precinct within the Prospect area within the Prospect heritage study, and a number of previous reports. Were this argument applied to each individual site in Western Sydney Parklands, then the rural / green buffer concept of the Parklands will be lost.

As such some mitigation of this impact should be considered. Methods of mitigation could include :

- Additional screen planting along the boundaries of the M4, Watch House Road and Reservoir Road.
- Use of colours and building forms which, while modern, utilise materials that are more consistent with a rural setting.
- Consideration of softening the large areas of car parking by creating a hierarchy of areas that include areas of soft paved and landscaped surfaces.
- Provision of additional shade trees within the car park.

Impact on Important View Corridors Within the Surrounding Landscape.

The visual setting and impact of the development has not been sufficiently assessed. A separate landscape visual assessment should be provided that assesses and makes recommendations in regard to the long range views onto the site from the Prospect area, including significant views from St Bartholomew's, Prospect Hill, Veteran Hall site, etc.

In particular, a photo montage should be provided to establish the impact of the development on the view to the south-west from the western entrance of St Bartholomew's, and the setting impact of the view of St Bartholomew's from the Watch House Road / Reservoir Road approach.

The Heritage Impact Statement indicated that the development is generally set down into the site so that the development is minimised. However, a large part of the land within the viewscape of St Bartholomew's is at current grade or is filled to a higher level. In addition the height, and colours of Rides 30, 31, 39, and 45 are likely to have a significant impact on the viewshed of St Bartholomew's and will visually dominate the precinct and the views within the area.

Recommendations:

It is recommended the Department of Planning be requested to require from the applicant a revised Heritage Report which addresses the following matters:

i) A landscape visual assessment of the development should be provided including a full view corridor analysis based on the parameters established for the Precinct in numerous past report and as outlined in the Prospect Heritage Study for Precinct 1 – Prospect Northern Slopes.

ii) The visual assessment should establish the extent, species and location of tree planting and screening on the site, appropriate and forms for use within the landscape, and the optimum location of the tall ride elements.

iii) Additional photo montages should be provided as part of the visual assessment to outline the impact of the development on the view corridor across the site from the Police House to St Bartholemews, and the viewshed toward the site from St Bartholemews to the south-west.

iv) The Proponent should provide detail on linked conservation works to be carried out to the Police Cottage.

v) An Archaeological Management Plan should be established for the potential remains of outbuildings and 1860 - 1890 development western parts of the site, including the pre 20th century cottage identified in the Heritage Impact Statement.

vi) Consideration should be given to softening the extent of hard surfaces parking in the Stage 2 parking area.

vii) Additional screen planting of Cumberland forest species mature eucalypt plantings should be provided to the boundaries as established in conjunction with a detailed visual analysis.

viii) The Western Sydney Parklands should be encouraged to formally list as heritage items the Police Cottage and the Reservoir Road alignment from Prospect Highway to Honeman and Boiler Close as they with the Great Western Highway.