

17 July 2026

Our Ref: 26/201106 [SSD-2025/1]
Our Contact: Harseerat Thind (02) 9562 1852

Rasmus Altenkamp
Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Mr Altenkamp,

RE: Request for Advice – Response to Submissions – 49-61 Stephen Road, Banksmeadow – Multi-Level Warehouse

Thank you for the opportunity to provide comment on the Response to Submissions (RTS) for the proposed Stephen Road Multi-Level Warehouse at 49-61 Stephen Road, Banksmeadow (the site).

Bayside Council provided a submission on the Environmental Impact Statement (EIS) on 3 April 2025 and on the Amendment Report and RTS on 15 May 2026. Council's previous submission on the RTS raised the following issues:

- **Built Form:** Concerns regarding inaccuracies in the shadow diagrams, integration of the proposed staff outdoor area, and the visual dominance of the Stephen Road frontage fence.
- **Landscaping:** Concerns regarding a shortfall in deep soil landscape area and opportunities for canopy establishment, inadequate landscape outcomes within the front and northern setbacks, insufficient justification for the use of jute weave in planted areas, and vegetation removal.
- **Tree Management:** Concerns regarding inconsistencies in the calculation of proposed tree canopy cover, and the requirement for a 5:1 replacement planting ratio.
- **Engineering:** Technical issues identified requiring resolution, related to traffic, parking and access, stormwater management, and floodplain management.
- **Development Contributions:** Recommended condition related to Section 7.12 Contributions.

Advice on the updated Response to Submissions

Council has reviewed the updated RTS and supporting documents. The amendments include:

Postal address
444-446 Princes Highway
Rockdale NSW 2216
ABN 80 690 785 443

Bayside Customer Service Centres
Rockdale Library, 444-446 Princes Highway, Rockdale
Westfield Eastgardens, 152 Bunnerong Road, Eastgardens

E council@bayside.nsw.gov.au
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- Relocation of the staff outdoor area behind the building setback to improve usability and allow additional landscaping along the Stephen Road frontage;
- Softened materials and finishes for the proposed retaining walls to mitigate visual impacts on adjoining properties; and
- Additional planting in accordance with the amended design to introduce increased screening, canopy cover and further mitigate visual impact.

While the amended proposal has addressed certain design and traffic modelling issues, Council continues to have concerns regarding specific aspects of the development, as detailed below. In particular, Council remains unable to conclude that acceptable stormwater and flooding outcomes can be achieved or that impacts on adjoining properties and public infrastructure can be appropriately managed. Hence, the proposal cannot be supported in its current form and recommended conditions cannot be provided at this stage due to the unresolved stormwater and flooding matters outlined in this submission below.

Engineering

1. Floodplain Management

The revised flood modelling for the development continues to detail unacceptable flood impacts on neighbouring properties. The flood afflux mapping for the PMF with 1% AEP + sea level rise (SLR)/climate change (CC) flood events indicates non-compliant increase in flood levels (flood afflux) on the adjacent property to the north (28 Swinbourne Street). This is a direct consequence of the filling associated with the development which is blocking an existing flow path through the site from the northern property (28 Swinbourne Street). While the upstream catchment is relatively small, the modelling nevertheless identifies unacceptable increases in flood levels. The flow path still exists and must be maintained in the development to ensure no increase in flood levels on the northern property. The development needs to be revised to provide a flow path/flood storage along the northern boundary supported by revised flood modelling that demonstrates no increase in flood levels on neighbouring properties.

The proposed development is effectively transferring flood impacts onto the adjacent property in the climate change and the PMF event, which is inconsistent with key principles of the Floodplain Risk Management Manual (2023).

2. Council Stormwater Pipe Relocation

- For the Council stormwater line relocation, the hydraulic grade line (HGL) indicates pits R13 and R14 are surcharging, however the pits are sealed. Council is concerned with a proposed sealed pit shown to be surcharging which may create a safety hazard/infrastructure damage therefore the following is required:
 - a. Provide justification for the proposed 600mm and 675mm Council pipe size connecting to the existing 525mm Council pipe downstream and consider the effects of this configuration on flood behaviour and safety of the surcharge.
 - b. Investigate a grated surcharge pit for the Council pipe in the landscape area with a storage mechanism (e.g. landscape basin) for surcharging flows to be stored without impacting Coal Pier Road.

- Council's stormwater pipe realignment is not modelled in DRAINS and TUFLOW. Revised DRAINS and TUFLOW modelling shall be provided that includes the drain augmentations to Council's network including ensuring all surveyed pipes are included in the model.

3. Stormwater OSD Connection to Coal Pier Road

Council will not permit the site discharge connection into its Coal Pier Road drainage in the current configuration. This is because the development's discharge flows to Coal Pier Road exceed the capacity of the road drainage system, which does not comply with section 3.2.5 of Bayside Technical Specification Stormwater Management. It's also considered that the 1% AEP surcharge from pit D04 is excessive and unsafe and, the connection method of a 600mm pipe to 375mm pipe is not justified. This surcharge will have impacts on the operation of Coal Pier Road (due to localised flooding) which is not supported. Normally, a connection like this would warrant an upgrade to the downstream drainage (e.g. upgrading 375mm pipe to 600mm pipe in Coal Pier Road) however, it is not feasible to upgrade downstream drainage in this location. Therefore, to allow the OSD connection to Coal Pier Road, the peak 1% AEP flows/overflows from the OSD need to be reduced and the 600mm pipe between the OSD and pit D04 to be reduced to 375mm and surcharge to be reduced to not negatively impact the road. This requires further discharge control (i.e. further reduced orifice and enlarged OSD with reduced overflows) which has design impacts on the development.

Built Form

4. Stephen Road Frontage

The applicant's response in relation to the existing 2.4m high fence and retaining wall is noted. However, the original concern did not seek the relocation of the retaining wall and fence to facilitate additional landscaping within the development site. Rather, the concern related to the visual dominance of the existing 2.4m high fence when viewed from the public domain and the need to soften its presentation and interface with Stephen Road with the increase screening landscaping. Currently only groundcovers are shown on landscape plans which is not acceptable and would not provide effective screening or soften the appearance of the fencing.

Further amendments to the proposed landscape treatment along the Stephen Road frontage should be provided. Any screening planting, including climbers or other vegetation which is intended to soften the appearance of the fence as referred to in the RTS, should be clearly demonstrated on associated landscape plans.

Landscaping

5. On-Structure Planting

The proposal continues to lack meaningful on-structure planting. The current frontage landscaping remains insufficient to mitigate the visual bulk and scale of the development. Given the site's interface with the adjoining R2 Low Density Residential zone, a stronger landscape buffer is required to provide an appropriate transition and soften the built form.

Tree Management

6. Tree Removal

Council notes the applicant's advice that the 4,858sqm canopy cover figure represents the post-development canopy outcome. It is also noted in the RTS that a pre-development and post-development canopy assessment would be provided to enable a more meaningful assessment of the proposal's canopy impacts. However, this assessment has not been included in the updated documentation.

In the absence of this information, we are unable to adequately assess the proposal's net canopy change or verify whether the projected canopy outcomes have been appropriately represented. A comprehensive canopy analysis that clearly identifies pre-development canopy cover, including existing canopy associated with trees proposed to be removed, and post-development canopy cover comprising retained and proposed trees is required. This analysis should clearly demonstrate the net change in canopy cover resulting from the development and ensure that canopy outcomes are not overstated.

Furthermore, it has not been demonstrated in the proposed replacement planting strategy that the proposed replacement trees can be appropriately accommodated on site to enable their long-term establishment and growth to maturity. Accordingly, the applicant should demonstrate that sufficient space and suitable growing conditions are available to support the projected increased canopy outcome. Where replacement planting cannot be realistically accommodated on site, Council considers that an appropriate offset mechanism, such as a deed of agreement, should be provided to address any adverse impacts to the canopy cover and ensure that the intended green corridor outcomes are achieved.

At this stage, we cannot support this State Significant Development Application in its current form due to the unresolved issues outlined in this letter. We request the opportunity to provide advice on the proposal again once the above matters are addressed.

We trust that the Department will carefully consider Council's advice when assessing this proposal. If you require any further information, please do not hesitate to contact Harseerat Thind, Urban Planner on (02) 9562 1852 or via email: Harseerat.Thind@bayside.nsw.gov.au. Thank you.

Yours sincerely,



Bianca Chiu

Coordinator City Planning