



Our reference: ECM: 9598535
Contact: Kathryn Saunders
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7 June 2021

Department of Planning, Industry and Environment
Attn: Bruce Zhang
Email: bruce.zhang@planning.nsw.gov.au

Dear Sir/Madam,

Response to Submissions – SSD-9794636 – Oakdale West Estate Stage 3 at 2 Aldington Road Kemps Creek

I refer to the Department's request to provide comments in relation to the proponent's Response to Submissions for the subject development proposal. Thank you for providing Council with the opportunity to comment.

The following comments are provided for the Department's consideration in relation to this matter.

1. Planning Considerations

(a) Levels, bulk and scale

In relation to Warehouse Lot 2C, Council has previously raised (refer Council correspondence issued to DPIE attention Bruce Zhang, dated 19 March 2021), that the proposed building arrangement and form is not supportable as the design has not sufficiently addressed visual prominence.

The height of the warehouse is greater than 15m (measured from natural ground) and is approximately 22.2m in height from the from the kerb line.

The response provided by Goodman in document Oakdale West Estate, Stage 3 (SSD-9794683) dated April 2021, does not address how the development will achieve an acceptable and sympathetic built form response in relation to the adjacent development and surrounding streets, notwithstanding the previously approved pad levels.

Council maintains that the warehouse developments need to step to align more closely with the topography of the land and to reduce related negative impacts caused by high retaining walls, fencing and building bulk. Alternately the warehouse pads and hard stands areas are to be reduced in scale and landscaped surrounds increased to provide for complementary landscaping, stepped retaining structures and landscaped batters.

(b) Site design, office layout and safety issues

The office buildings attached to warehouse 2C-1 and warehouse 2C-2 are located at the furthest point away from the staff and visitor car park entry points and the entry points to each office building are inconvenient to the location of the majority of car parking spaces.

It is unclear where the outdoor staff area is for the office staff and visitors attached to warehouse 2C-1. There is insufficient buffer between the 2C-1 office and the heavy vehicle ramp (northern side).

Pedestrian access from the street is inconvenient and not direct for all office buildings. Covered bicycle parking areas are not nominated for any of the warehouse parking areas.

The office attached to warehouse 2C-2 is to be located on the corner of Estate Road 03 and the Southern Link Road as its physical address and access point will be from Estate Road 03.

It is unclear how the ramping of the aisles (warehouse 2C-1 and 2C-2) will work in relation to the non-ramped car parking spaces – particularly over the length of the ramped aisle. Sections to be provided.

Warehouse 2D is inappropriately located. The office location is hidden from view (internally and from the primary street front access point) and it is proposed that pedestrians and cyclists and staff and visitors vehicles are to access the office and its carpark via the heavy vehicle ramped driveway and are also required to drive through the truck manoeuvring area.

This is an unacceptable safety outcome. Access to the office and its parking for pedestrians, cyclists and for visitor and staff must be separated from heavy vehicle access and manoeuvring areas.

It appears that the provision of three warehouse tenancies on the site is forcing the inappropriate location of each office building and is resulting in poor and avoidable safety outcomes.

It is inadequate to suggest (page 17/22 of the Goodman Response document) that the proposed shared heavy and domestic vehicle and pedestrian access arrangement is acceptable as *“staff will have detailed onsite briefing and inductions prior to the operation of the site”* and that *“the same applies to the truck drivers whom will be provided with a Code of Conduct and will be made aware of any possible conflict with the light vehicle movements”*.

The proposed access arrangements for pedestrians, bicycles and staff and visitor private vehicles to Warehouse 2D is unacceptable.

(c) Services

Services such as pad mounted substations should not be located such that landscaping is reduced. A greater number of landscaped blisters are to be provided in car parking areas – Council’s DCP requires one canopy tree per six car parking spaces. Blisters shall be generous in width and in soil volume.

It is not understood if access arrangements to the one sprinkler tank is sufficient to comply with NSW Fire Brigade requirements. The sprinkler tank and the waste storage areas for warehouses 2C-2 and 2D will present poorly to the Southern Link Road and will detract from the visual quality of the public domain and set a poor precedent.

(d) Landscaping

Council reiterates its comments in relation to landscape considerations which are copied below in part. The applicant's response is considered unsatisfactory. Canopy trees are required to be provided in pockets to respond to the bulk and scale proposed. The below is to be read in conjunction with Council's previous advice dated 19 March 2021.

"As has been requested in preceding stages, continuous canopy street tree plantings in organic mulch is required for maximum shade and cooling to satisfy Council's Cooling the Cities Strategy. The spatial arrangement of street tree planting is inadequate, as continues to be indicated in the concept plans submitted within each stage. Additional infill planting between excessively spaced street tree groupings is required to ensure continuous canopy or layering of canopy planting within the verge as well as within the street setback zones."

"The landscape plans suggest that corner treatments will feature small trees however tall canopy trees are recommended to minimise the visual appearance of bulk and scale of built forms from key vantage points. This will also assist to reinforce the spatial qualities of the road network. For example, the proposed mature tree height in the north west corner of Lot 2A is particularly important as the finished floor level if the built form is approximately 9m above natural ground presenting a poor interface to the public domain which is viewed from the roadway on the site approach but also further north through the Amazon car park. The visual impact of built forms in this area requires additional consideration and refinement as the existing side boundary setback, finished levels and visual bulk of the built form is currently inadequately addressed."

(e) Bicycle parking and end of trip facilities

Complying numbers of secure, all weather bicycle parking, end of journey facilities, change rooms, showers, lockers are to be provided at convenient locations at each warehouse development in accordance with Council Development Control Plan (DCP) C10 Section 10.7, AS 2890.3 Bicycle Parking Facilities and Planning Guidelines for Walking and Cycling (NSW Government 2004).

It is not sufficient to suggest that the above facilities can be included in Construction Certificate documentation.

(f) Sustainability

All warehouses are to demonstrate a whole of building approach to sustainability and address the relevant clauses of the legislation in relation to sustainability. Roof top solar and rainwater tanks are to be provided for each warehouse.

2. Engineering Considerations(a) Stormwater engineering

A Stormwater Management Plan (SMP) and concept stormwater plan is to be submitted with the application. The SMP shall demonstrate how the

development complies with the overarching stormwater management strategy approved under the parent subdivision.

A water sensitive urban design strategy prepared by a suitably qualified person is to be provided for the site. The strategy shall address water conservation, water quality, water quantity, and operation and maintenance.

(b) Traffic engineering

The entry and exit for any car parking areas to and from a public road is to be separate from any heavy vehicle access. The car park entry for Warehouse 2D is not supported on safety grounds due to the conflict with heavy vehicles.

A separate entry / exit is to the car park is to be provided from a public road.

3. Traffic and Parking Considerations

(a) Pedestrian access and accessibility

The proposed pedestrian access from the car parking areas and road frontage pathways across the heavy vehicle aisles to the buildings at warehouses are not supported due to conflict with pedestrian and heavy vehicles.

There must be a separate, safe, DDA and Australian Standards complying accessible pedestrian path of travel from the road frontage and the car parking areas to the buildings that are clear of any heavy vehicle traffic movements.

Accessible pedestrian paths of travel at least 1.5 metre wide are to be provided from the car park to all offices and staff facilities of the building. Accessible parking is to be provided with accessible paths of travel to the facility in accordance with AS 2890.6.

(b) Traffic Impact Assessment

The development shall be supported by a Traffic Impact Assessment of the proposed development, road and footway network, heavy vehicle and light vehicle access, complying number of heavy vehicle parking, loading and manoeuvring areas and complying numbers of light vehicle staff and visitor parking spaces including compliance with Australian Standards, Austroads Guidelines, TfNSW (RMS) Technical Directions / Guidelines and Council's Development Control Plans (DCPs) including DCP C10.

The Traffic Impact Assessment shall include the proposed development driveway accesses for heavy vehicles and visitor / staff car parks, sight distance compliances at intersections and driveways, arrangements for waste collection vehicles, emergency / fire service vehicles and other service vehicles, accessible parking and at least 1.5 metre wide accessible pedestrian access from the road frontage and the car park to the buildings, car parking and bicycle provision numbers and bicycle facilities , electric vehicle charging station provisions and manoeuvring swept turn paths.

This should include compliances with Austroads Guidelines, TfNSW (RMS) Technical Directions / Guidelines, AS 2890 including parts 1, 2 & 6, AS 1158, NSW Government Walking and Cycling Guidelines and Council's Development Control Plan.

The Traffic Impact Assessment and documentation shall include dimensioned plans of the proposed accessible paths of travel, driveways, access aisles, loading and vehicle swept path manoeuvring areas and parking spaces and sight distance requirements at intersections and driveways including compliance with Austroads Guidelines, TfNSW (RMS) Technical Directions / Guidelines, AS 2890 including parts 1, 2 & 6, AS 1158, NSW Government Walking and Cycling Guidelines and Council's Development Control Plan.

(c) Separation of heavy vehicle access

Heavy vehicle access from the public road shall be physically separated from vehicle access to the car parking areas for safety reasons. Car vehicular access to the carparking areas of Warehouse 2D is not supported due to the conflict with heavy vehicles.

(d) Access and manoeuvring layout

Plans shall include dimensions of driveways, ramps, aisles, parking spaces, accessible parking, bicycle parking, 1.5 metre wide concrete footpaths from the street frontages to building accesses, from the car park to building access, other internal footpaths, services vehicle manoeuvring and loading areas complying with AS 2890, AS 1428, Council Development Control Plan (DCP) Section C10 and other Council guidelines.

(e) Sustainability

A minimum of two Electric Vehicle Charging Stations (EVCS) are to be provided within the car parking areas of each warehouse development. The charging stations are to be designed to accommodate the requirement of commercially available public vehicles and their required connector types (currently known as Type 1 and Type 2 connectors).

A minimum of three additional car parking spaces are to be designed to as to be readily retrofitted as EVCS parking spaces. The installed EVCS car parking spaces are to be signposted and marked as for the use of electric vehicles only and are to be located as close as possible to the building accesses after accessible parking space priority. EVCS are to be free of charge to staff and visitors.

(f) Signage

Appropriate signage, visible from the public road and on-site shall to be installed to reinforce designated vehicle circulation and to direct staff / delivery vehicle drivers / service vehicle drivers / visitors to on-site parking, delivery and service areas.

(g) Sightlines

The required sight lines around the driveway entrances and exits are not to be compromised by street trees, landscaping or fencing. Sight distance

requirements at driveways are to be in accordance with AS 2890.2 Figure 3.3 and Figure 3.4.

4. Waterways Considerations

Council's Water Management Officer has reviewed the information provided and note the development was approved with a precinct stormwater management plan which included precinct bioretention systems.

The basins will not be dedicated to Council and will be maintained in perpetuity by the developer. Council has no issues provided stormwater treatment measures are provided in accordance with the approved overarching stormwater strategy.

Council notes that gross pollutant traps are required to be provided on site and these were nominated as CDS style in the approved strategy. Water conservation measures are also required to be provided on site with a target of meeting a minimum of 80% non-potable with the use of harvested rainwater.

Should you require any further information regarding the comments, please contact Kathryn Saunders, Senior Development Assessment Planner on (02) 4732 8567.

Yours Sincerely,



Gavin Cherry
Development Assessment Coordinator