

31 August 2023

Our Ref: F23/468  
Our Contact: Christopher Lazaro (02) 9562 1627

Catriona Shirley  
Industry Assessments  
Department of Planning and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

Dear Catriona,

**RE: Request for Advice – Environmental Impact Statement – Multi-Level Warehouse, 2-8 Baker Street, Banksmeadow [SSD-48411467]**

Thank you for the opportunity to provide comment on the Environmental Impact Statement (EIS) for the proposed Multi-Level Warehouse at 2-8 Baker Street, Banksmeadow.

Bayside Council provides this Final Submission on the EIS which was endorsed by Council at its meeting held on 23 August 2023.

Council's resolution identified further issues for consideration, including heavy vehicle traffic movements and use of Holloway Street, B-Double egress and the treatment of Baker Street. It is acknowledged that these issues have been addressed in the Transport Impact Assessment report prepared by JMT Consulting, dated 18 May 2023.

Therefore, there is no change to the issues raised between the Draft Submission (dated 24 July 2023) and this Final Submission.

**The Proposal**

Council acknowledges that Stockland Corporation Limited contacted the Department of Planning and Environment (DPE) to request Industry-Specific SEARs for a State Significant Development Application (SSDA) at 2-8 Baker Street, Banksmeadow. The application consists of the following:

- Demolition of existing warehouse and construction a multi-level warehouse and distribution centre, with ancillary office space with the following floor areas:
  - Warehouse 1: 4,948sqm
  - Ancillary offices: 552sqm
  - Ancillary dock offices: 78sqm
  - Warehouse 2: 6,770sqm
  - Ancillary offices: 341sqm

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- Ancillary dock offices: 78sqm
- Total floor area: 12,767sqm (0.82:1)
- Height of 22.2m
- Construction of two new vehicle access points for trucks with external ramps for upper-level warehouse access.
- Estimated Capital Investment Value of \$45 million.
- Relocation of the existing Council stormwater pipe that traverses the site.

## **Response to SEARs**

Bayside Council previously provided a response to the SEARs on 25 October 2022, which identified the following issues to be addressed in the EIS:

- Traffic, parking and access
- Flooding
- Council stormwater infrastructure
- Landscaping
- Built form
- Amenity
- Soil and groundwater contamination
- Hazards and risk

## **Council's Submission**

Council has reviewed the submitted documentation and raises the following objections:

### **Landscaping**

1. The application proposes to remove several significant mature trees from both within the site and the public domain. Furthermore, there is insufficient space provided to offset the loss of trees removed by the proposed development. As such, the development will create a substantially reduced level of environmental amenity uncharacteristic with the street. The proposal is capable of design changes that will ensure the maximum number of trees can be retained on site.
2. Council raises the following objections to the proposal in relation to landscaping:
  - a) The Arborist Report prepared by Canopy Consulting on 5/12/2022 recommends removing several trees with a medium to high priority for retention for what is considered minor impacts. These minor impacts include the construction of retaining walls, stormwater infrastructure, earthworks, and fire hydrant infrastructure. These are not considered sufficient grounds for removing trees with a medium to high retention value given they can feasibly be retained with minor modifications to the design or location of these works.
  - b) The proposed landscaping areas are insufficient to offset the loss of trees being removed. The proposed setbacks are too narrow to accommodate the trees proposed in the Landscape Plan prepared by Geoscapes on 19/05/2023. The Landscape Plan proposes large indigenous trees along the south-eastern corner, however the setback is only 1.4m wide which can only accommodate small trees or screening shrubs.

- c) The southern setback includes stormwater infrastructure within the 1.4m setback, further limiting the available space for tree planting.
- d) The proposed plans do not indicate the location of fire egress paths, which may be located along the periphery of the site. To avoid further reduction of the landscaping area, fire egress paths should be incorporated into design to ensure they do not conflict with the proposed landscaping area.
- e) Bayside Council typically requires that for every tree removed, three similar trees be planted. The proposed landscaping includes 42 new trees to replace the 46 trees being removed. However, as described above, many of these trees are located in areas either too small to accommodate the proposed tree species or likely to conflict with other proposed infrastructure.

As such, the proposed development will result in a significant net loss of tree canopy. This is not consistent with Clause 5.29 Preservation of Trees of SEPP (Transport and Infrastructure) 2021, and the Bayside DCP 2022.

- f) The following significant trees are to be retained:
  - 2 *Corymbia maculata*. High Retention Value. Useful Life Expectancy. ULE (Years) Long (>40 year's)
  - 7 *Corymbia maculata*. High Retention Value. ULE Medium 15-40
  - 8 *Angophora costata*. High Retention Value. ULE Long >40
  - 12 *Eucalyptus scoparia*. High Retention Value. ULE Medium 15-40
  - 21 *Angophora costata*. High Retention Value. ULE Long >40
  - 22 *Eucalyptus microcorys*. High Retention Value. ULE Long >40
  - 24 *Corymbia citriodora*. High Retention Value. ULE Long >40
  - 33 *Eucalyptus microcorys*. High Retention Value. ULE Long >40
  - 38 *Eucalyptus microcorys*. High Retention Value. ULE Long >40
  - 45 *Eucalyptus microcorys*. High Retention Value. ULE Long >40
  - 46 *Eucalyptus microcorys*. High Retention Value. ULE Long >40
  - 61 *Corymbia maculata*. High Retention Value. ULE Long >40
- g) Tree number 24 *Corymbia citriodora* (Lemon Scented Gum) is a very significant tree within the site that will require the exit driveway to be modified to ensure protection and retention of the tree.
- h) Buffer planting with large and medium canopy trees shall be provided along the front and northern setback of the site.
- i) The proposed side setback of 1.4 metres along the southern setback front portion (9 metres) shall be increased to at least 3 metres, to ensure the area between the driveway and boundary can accommodate canopy trees to provide suitable softness to the streetscape.

### **Built Form**

- 3. The proposed building envelope maximises efficient warehouse space. Notwithstanding, the proposed truck ramps extend the building envelope into the setbacks which exacerbates bulk and scale impacts and tree removal. Council raises the following objections in relation to built form:

- a) The proposed ramp along the Holloway Street frontage elevates approximately 9.5 metres above ground level and is wrapped with a screen approximately 13.5 metres above ground level. The proposed ramp and screen is only setback 3 metres from the boundary, requiring several existing trees to be removed.

The proposed ramp should have a minimum setback of 6 metres to appropriately respond to the context of Holloway Street which consists of significant street trees and fronts sensitive land uses, including residential apartments and a public school.

- b) The proposal creates residual spaces within the site, particularly around the ramps and the south-west corner of the site. This compromises the landscape area fronting both Holloway and Baker Street. These residual spaces shall be reduced so that a 6m setback along Holloway Street can be achieved.
- c) It is recommended that large scale details of screen and blades are reviewed to ensure a high quality facade.

### **Traffic, Parking and Access**

- 4. The application proposes three vehicle access points along Baker Street. The width and location of these driveways must be designed to reduce the loss of existing mature trees and maximise space for replacement tree planting, both within the site and in the public domain.
- 5. The Bayside DCP 2022 came into effect on 10 April 2023. The proposal makes reference to the former Botany Bay DCP 2013 parking provisions, which are no longer current. In line with the Bayside DCP 2022, the proposal shall increase the parking provisions to the following:
  - a) Car parking spaces – 68
  - b) Bicycle spaces – 22
  - c) Motorcycle spaces – 8

In addition to this, Council advises that 20% of the car parking spaces should be equipped with EV chargers.

- 6. Further information shall be provided with regards to the swept path analysis:
  - a) Swept path analysis for a B85 passing B99 vehicle at the circulation for ramps and circulation aisle as per AS2890.1 at the ground level driveway.
  - b) Swept path analysis for the 19 metres long AV and 26 metres long B-Double entering the site via the proposed driveways needs to be revised to show the entire width of Baker Street, show the centreline of the road, and show the locations of on-street parking on both sides of Baker Street.
  - c) Traffic report to be updated to address the additional swept paths required and driveway access ramp grades for the A Double and AV and the minimum head clearance for the largest vehicle. The traffic report to make comments on the proposed driveways.

7. A longitudinal driveway profile for each vehicular crossing proposed is to be prepared by a qualified Civil Engineer and should be submitted to Council for assessment. The profiles should start in the centre of the road and be along the critical edge (worst case) of the driveway. Gradients and transitions shall be in accordance with AS2890.1 & AS2890.2 as applicable. The profile shall be drawn to a scale of 1 to 25 and shall include all relevant levels, grades (%), headroom clearances and lengths.

The existing boundary levels shall be clearly shown on the profile, any change to the existing boundary levels requires approval from Bayside Council. The architectural plans and stormwater plans are to be coordinated to reflect the longitudinal driveway profile.

## **Flooding**

8. The Civil Engineering Report prepared by Costin Roe Consulting on 30/03/2023 addresses ground and water conditions, stormwater and wastewater and flooding risk in relation to the proposal. It is advised that the civil engineering plans should include more details for the flood storage basin (levels, volume, top water level, grading, signage, fencing, maintenance schedule, internal dimensions etc) including draining of the basin.

## **Stormwater Management**

9. The proposed stormwater documentation shall be amended to include the following information:

- a) The submitted documentation does not include an On-Site Detention System (OSD) calculation, which confirms the volume required for the internal OSD system. The Permissible Site Discharge (PSD) from the site shall be designed to restrict the discharge to the predeveloped runoff in the "state of nature/greenfield" condition (predeveloped site must be assumed as 100% pervious i.e., the site is totally grassed/turfed) for the 20%, 10%, 5%, 2%, and 1% AEP storm events. The OSD storage volume shall be designed to ensure this achieved. Post developed flow shall be checked for all storm events (20%, 10%, 5%, 2%, and 1%) verifying that the post developed flow from the development site during each storm event does not exceed the PSD for each storm event, and that this has been achieved in the design of the OSD system.

Emergency overflow from the OSD system shall be zero up to the 2% AEP storm event. Runoff times of concentration for pervious areas are preferably calculated using the kinematic wave equation recommended in Australian Rainfall & Runoff. A minimum time of concentration of 5 minutes is acceptable for paved / impervious areas. The time of concentration used in the OSD modelling is to be justified to the satisfaction of Bayside Council. The OSD storage volume shall be provided such that the piped outflow of OSD system and emergency overflow/bypass flow from the development site does not exceed the PSD allowed for the site in all storm events.

- b) A WSUD catchment plan to be provided to clearly show the survey and architectural in the background. The catchment areas in the catchment plan are to be accurately reflected in the MUSIC Model.
- c) The proposed retaining walls on the finished levels plan is to be updated to include the top of wall (TOW) and bottom of wall (BOW).

- d) The civil engineering report is to update the MUSIC Modelling for the rainwater tank reuse and is to use 0.4kL/year/m2 for the irrigation of landscape areas in addition to the toilet flushing. A water balance is to be provided. The civil engineering report is also to make commentary on the tailwater conditions adopted for the minor and major storms for the DRAINS Model.
- e) The OSD plan is to be amended to provide a discharge control pit (overflow chamber). An overflow weir is to be provided for the OSD.
- f) A OSD base plan is to be provided for the OSD, showing all base levels and minimum 1% fall towards the outlet pipe.
- g) The OSD must be designed according to Part 6 of Bayside Technical Specification Stormwater Management.

### **Council Stormwater Realignment**

10. The proposed realignment of the Council stormwater pipe is supported subject to the following comments being addressed to Council satisfaction:

11.

- a) The DRAINS Model submitted for the realignment of the Council pipe to be updated to model the existing kerb inlet pits along Baker Street including the connection to Baker Street to the existing Council pipe in Baker Street.
- b) The upstream catchment is to be shown that was used in the DRAINS Model (currently the Model shows a surface grated pit with a hydrograph, and we require more information on how this was determined). The exact upstream catchment area must be provided to Council for further assessment.

We trust that the Department will carefully consider Council's submission when assessing this proposal.

If you require any further information please do not hesitate to contact Christopher Lazaro, Senior Urban Planner on (02) 9562 1627 or via email: [christopher.lazaro@bayside.nsw.gov.au](mailto:christopher.lazaro@bayside.nsw.gov.au).

Yours sincerely,



David Smith  
**Manager Strategic Planning**