

12 March 2025

Our Ref: SSD-2024/12
Our Contact: Lisa Ho (02) 9562 1864

Catriona Shirley
Industry Assessment
Development Assessment and Infrastructure
Department of Planning, Housing and Infrastructure

Sent via email: Catriona.shirley@dpie.nsw.gov.au

Dear Ms Shirley,

RE: Advice on Environmental Impact Statement – 130 Wentworth Avenue, Banksmeadow (SSD-73846459)

Thank you for the correspondence dated 18 February 2025 inviting Bayside Council to comment on the Environmental Impact Statement (EIS) submitted for the State Significant Development Application (SSDA) for a Multi-Level Warehouse proposed at 130 Wentworth Avenue, Banksmeadow (the subject site).

The SSDA involves the construction and 24-hour operation, seven days a week, of a Multi-Level Warehouse and Distribution Centre (MLWDC), with a maximum height of 27 metres and Gross Floor Area of 40,578m² including ancillary facilities, car parking, landscaping and site infrastructure.

Council has reviewed the EIS and supporting documents and a summary of the key issues include:

- **Urban Design** – no major issues, further information required to ascertain visual impact from south-east corner of building.
- **Loss of Trees** – concerns relating to loss of trees, addressing the NSW Government's tree canopy target, and addressing tree loss and its compliance with *Bayside Development Control Plan 2022* (BDCP 2022).
- **Traffic and Parking** – issues relating to the accuracy of the Transport Impact Assessment (TIA), further information to address TIA.
- **Stormwater** - the Onsite Stormwater Detention (OSD) has not been designed correctly as per Council Specifications, further information required to address compliance with Council's stormwater requirements.
- **Cumulative Impact** – consideration of recently approved Multi level warehouse and distribution centre at 2-8 Baker St, Banksmeadow.

Detailed comments are provided in **Attachment A**.

If you require any further information, please do not hesitate to contact Lisa Ho, Senior Urban Planner on (02) 9562 1864.

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Yours sincerely

A handwritten signature in black ink, appearing to read 'J. Ford', with a stylized flourish at the end.

Josh Ford
Acting Manager Strategic Planning

Attachment A: State Significant Development Application – 130 Wentworth Avenue, Banksmeadow

1. Urban Design

Aesthetic / massing

The proposal is in the E4 General Industrial zone. The immediate buildings to the east, west and south are industrial uses. The north of the subject site is open space including Mutch Park/ Bonnie Doon Golf Club to the north, separated by Wentworth Avenue. The massing is suitable for the use. The location of offices oriented to Wentworth Avenue is the preferred option is supported by breaking down the massing more than the 200m street wall along Wentworth Avenue.

The facades are designed to use vertical elements and materials to break down the massive in other facades.

Street setback

The current proposal provides a variety of setbacks more than the required minimum of 9m). The proposed northern, western and southern boundary setback are supported.

The eastern boundary proposes a building setback of 12m and a landscape setback of 1-2m to the site's southeast corner. Consideration should be given to the eastern boundary to provide more landscape setback to its adjoining neighbour—an additional perspective to show the building's relationship to the adjoining development at Moore Street's southeast corner is required.

The southern boundary (Moore Street) providing a 9m landscape setback is supported.

Figure 1, below, is a viewpoint of the subject site from Moore Street. An additional montage is required to demonstrate the visual impact of the proposed development from this, or similar, perspective.



Figure 1: View of the subject site, looking northwest from the corner of Moore and Wight Streets

Lighting and safety

The area is in an industrial zone. Wentworth Avenue is dark and is unsafe for pedestrians, especially in the evenings in winter. There are no other adjacent land uses that provide passive surveillance for workers after they leave the building. A lighting strategy is required to ensure pedestrian safety at office entrances, the secondary pedestrian pathway, and the public/private interface along Wentworth Avenue and Moore Street, paying particular attention to consistency of lighting levels moving between areas.

Access

In relation to the site's proximity with the bus stop on Wentworth Avenue, investigate the opportunity for the development to provide a bus shelter to support its workers, noting that the road reserve has inadequate space due to the cycleway.

Investigate opportunities to improve pedestrian access on Wentworth Avenue and Moore Street by enhancing the public domain's safety, comfort, and walkability.

Regarding access to car parking, provide design responses in the design report to ensure safety for workers and visitors accessing the parking, such as lighting and separate pedestrian walkways with physical barriers from vehicles.

2. Tree Management

- Council's Environment and Resilience officers raised concern in relation to the loss of a significant number of trees and associated habitat within the site.
- 798 trees are present on site (721 trees are protected, 80 are native, and 456 are indigenous. 77 trees are exempt via BDCP 2022 and 13 trees are exotic). The SSDA seeks to retain 277 of the existing 798 trees and remove 521 existing trees (65% loss of individual trees). Removal of 521 trees includes: 166 High Retention Value trees; 215 Medium Retention Value trees; and 67 Low Retention Value trees. 188 new trees will be planted. This equates to a net loss of 333 trees or 42% loss of individual trees, based on an assumption that all new 188 trees would reach maturity at some point in the future.
- Appendix H Landscape Plans (Drawing C-TP2) states that existing tree canopy is 3,778m² and proposed tree canopy (estimate at maturity) is 7,954m². Appendix H Landscape Plans (Drawings B-LP1, C-TP2) show locations of new tree plantings, but the EIS and its supporting documentation do not seem to provide any detail on how the proposed canopy (estimate at maturity) can achieve 7,954m².
- Appendix M Biodiversity Development Assessment Report (BDAR) Waiver (page A-27) states "The mainly planted canopy trees may provide potential foraging habitat for the threatened fauna species Grey-headed Flying-fox (*Pteropus poliocephalus*) foraging for nectar and pollen produced by the planted trees. They are known to eat the blossoms of Eucalypts, Callistemon species and the fruits of *Ficus rubiginosa* and *F. benjamina* (Benson and McDougall 1998), these species have been recorded onsite."
- Removal of 521 trees would result in:
 - Loss of tree canopy cover (square metre canopy loss not quantified in EIS report)

- Loss of biodiversity habitat and food resources. Following planting of 188 new trees, there will be a significant time delay before planted trees reach their canopy cover potential.
- The removal of 66 Eucalypts trees, Callistemon species (total tree number not stated in the BDAR Waiver) and the fruits of 18 *Ficus rubiginosa* and *F. benjamina* trees will likely impact adversely on food resources for Grey-headed Flying-fox.
- Adverse impacts on biodiversity values/ green corridors to the north of the site (Mutch Park, golf courses) and along Moore St/ Baker St/ Anderson St to the south/ south-west (BDAR Waiver, page 6).
- Worsening of urban heat after 521 trees are removed. EIS pages 119 and 137 acknowledges that “the intensification of industrial use may lead to increased urban heat island effect, additional noise, and traffic, all of which can negatively affect the health of workers and nearby residents.”
- The EIS Report addresses trees, canopy and urban heat, but does not:
 - quantify tree canopy gain or loss,
 - address the NSW Government tree canopy target of 40% for Greater Sydney by 2040, or
 - address the 2024 NSW Government Architect *Biodiversity in Place (2024)*, a framework to improve urban biodiversity in NSW.
- As per Bayside’s 2032 *Community Strategic Plan* and *Urban Forest Strategy 2024–2040*, Council has a goal to increase Bayside’s tree canopy across the Bayside Local Government area (LGA). Bayside’s goal contributes to the NSW Government tree canopy target of 40% for Greater Sydney by 2040.



Figure 2: Trees located on property surrounding the current building

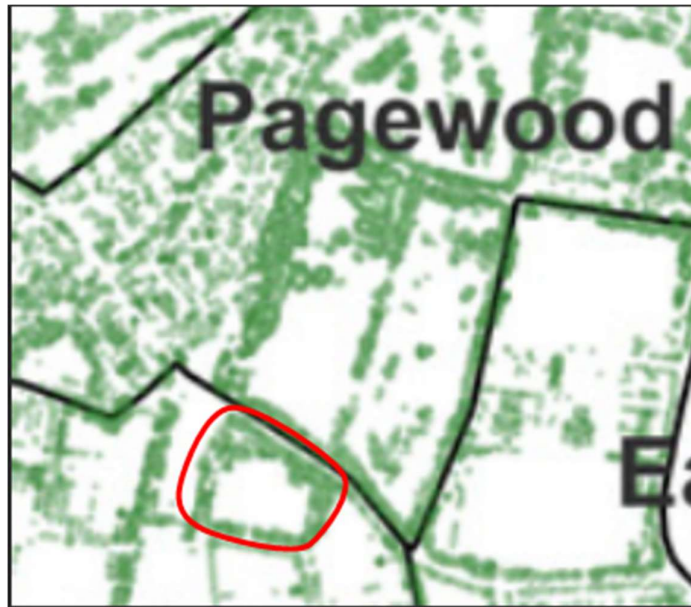


Figure 3: Tree canopy cover located on property



Figure 4: Tree canopy cover located on property

Council requests that any amended submission addresses and incorporates the following recommendations:

- Provide evidence on how the proposed on-site canopy (estimate at maturity) will achieve 7,954m² (Appendix H Landscape Plans Drawing C-TP2),
- Specify how the loss of Grey-headed Flying-fox food resources from removal of 66 Eucalypts trees, Callistemon species (total tree number not stated in BDAR Waiver) and the fruits of 18 *Ficus rubiginosa* and *F. benjamina* trees will be replaced by new tree planting on site,
- Tree offsets to be implemented as per BDCP 2022, and
- Tree pot size to be 100L minimum as per BDCP 2022.

3. Traffic Parking and Access

- The 2.0% background growth used in the 10-year future scenario in Appendix X Transport Impact Assessment (TIA) is not representative of current traffic growth experienced in the local area. The background growth shall be revised to be based on Transport for NSW's (TfNSW) traffic count data on Wentworth Avenue (Station ID: 16150) excluding skewed data, or by using Emme data from TfNSW.
- The TIA is to be revised to undertake a cumulative traffic assessment for 'all developments' in the area. There are approved developments at 2-8 Baker Street (SSD-48411467), 1 Baker Street (DA-2017/1249), and the directly adjacent site, being 132 Wentworth Avenue (DA-2019/79). The traffic generation of these developments needs to also be considered.
- The TIA truck swept path analysis (drawing 2462_01 and 2462_02) has been undertaken with a 19m long Articulated Vehicle from a superseded version of Australian Standard (AS 2890.2:2002). The swept path analysis needs to be revised to model the swept paths of a 20m long Articulated Vehicle from the most recent version of the Australian Standard (AS 2890.2:2018).

- The submitted truck swept paths in the TIA make it evident that truck driveways both into and out of the ground floor and the truck driveway to level 1 need to be widened within the site. In their current design, on-street parking next to these driveways will interfere with truck swept paths. These driveways shall be revised to provide splays in the site extending out to the area adjacent to the driveway where on-street parking would otherwise interfere with the swept paths of trucks. It's noted that due to the street tree adjacent to the truck entry driveway to level 1 that a splay is not possible and other driveway modifications or signposting are necessary to facilitate swept paths.

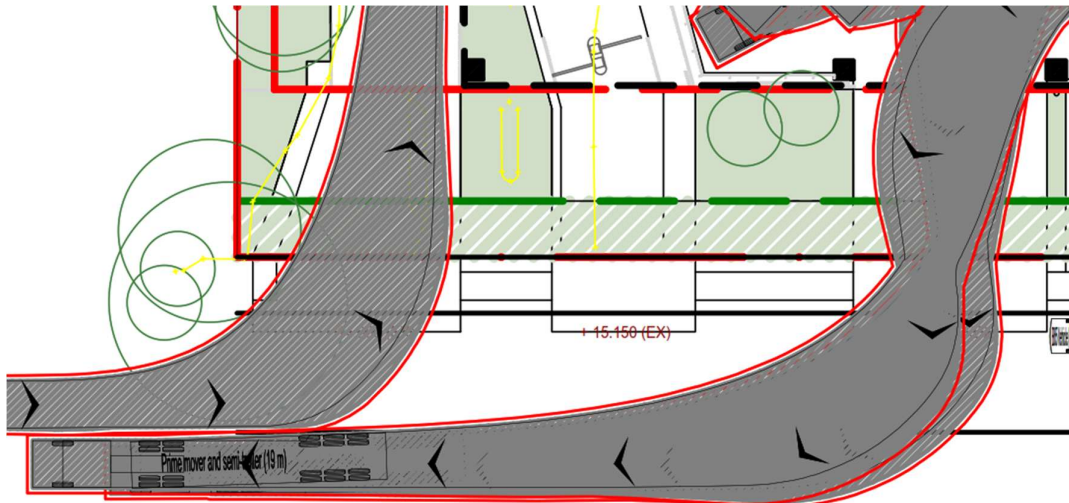


Figure 5: Truck driveway entry to level 1 and truck driveway exit from ground floor:

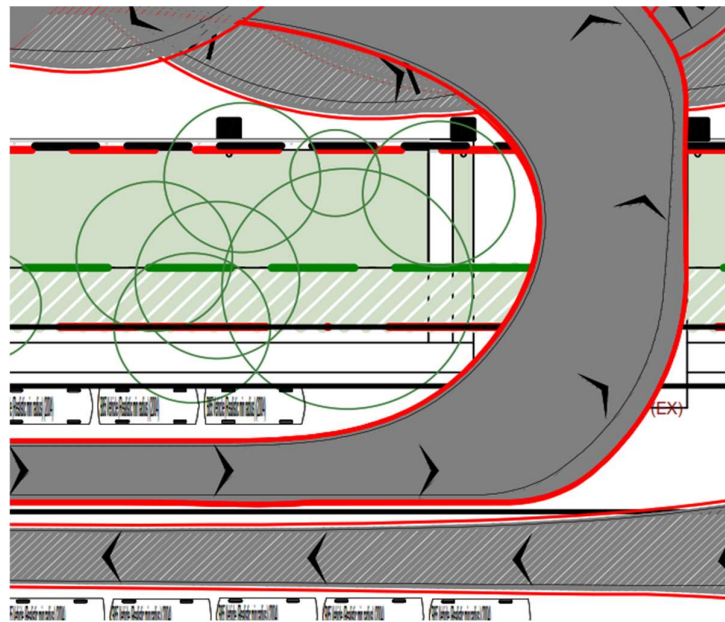


Figure 6: Truck driveway entry to ground floor:

- The car park entry/exit driveway shall be revised to be located adjacent to the truck entry to level 1 driveway so that these driveways are not separated.

- The passenger vehicle swept paths in the TIA (drawing No 2462_03) do not fully demonstrate a B85 vehicle passing a B99 vehicle in the entire car park circulation aisle and car park ramps. This must be revised to demonstrate compliance.
- The truck driveway ramps to level 1 gradients (change of grade) are to be revised to comply with AS 2890.2:2018, particularly table 3.3 of the standard. A longitudinal driveway profile prepared by a qualified Civil Engineer shall be submitted to Council for assessment. The profile shall 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 AS2890.2. The profile 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.
- A qualified arborist is to confirm the truck entry driveway to level 1 will have no impacts on the existing street tree to the west of that driveway.
- This development will be required to construct a footpath in the public domain along with street tree planting on the entire site frontage to Moore Street.

4. Flooding/Stormwater

- The OSD has not been designed correctly as per Council Technical Specifications for Stormwater Management. The DRAINS Model for the OSD sizing does not comply with the Technical Specification Section 6 as the post development flows (including OSD bypass flows) exceed the entire site pre-development flows as fully turfed. The DRAINS modelling and OSD design must be revised to comply with Bayside Technical Specification Stormwater Management 6. The current modelling does not show the landscape bypass of 3810m² (0.381ha, hectares being the unit of measurement used in Appendix FF Civil Engineering Report). Further, the OSD and DRAINS Modelling is to be revised to include the tailwater condition as per Section 6.3.3 as either top of the surface grate in the road or the 1% AEP flood level/ Hydraulic Gradient (HGL), whichever is higher.
- An analysis (HGL) for the OSD discharge and the existing drainage in Moore Street shall be provided and demonstrate compliance with Bayside Technical Specification Stormwater Management Section 3.2.5. An upgrade of the existing drainage in Moore Street may be required.
- A base plan is to be provided for the OSD, showing all base levels and minimum 1% fall towards the outlet pipe. The dimensions of the internal walls to be shown of the OSD including the weir levels.
- A lid plan to be submitted for the OSD; showing the distance from pit centre to centre. The grates spacing of the access grates to be a maximum of 6m from centre of pits to pit.
- Clarification is required if the OSD section has a continuous column or structural walls.
- The overland flow paths to be shown on the ground floor stormwater plan for the 1% AEP storm event.
- As per the MUSIC Model, the landscape catchment area of 0.334ha drains through the storm filter chamber, however no drainage is provided at the bottom of the embankment to capture the run-off to drain into the storm filter chamber.
- The surface pits that are fitted with the pit inserts are to be clearly shown.
- A detailed survey to be provided for the existing drainage in Moore Street and must include pipe sizes, invert levels and location of the existing drainage.
- The OSD outlet pipe drains through an existing Council tree which is not permitted.

5. Cumulative Impact – Multi Level Warehouse SSD at 2-8 Baker St, Banksmeadow

The proposal does not consider the impact of the approved State Significant Development (SSD) at 2-8 Baker Street, Banksmeadow. On 19 March 2025 development consent was granted for the construction and 24-hour operation of a two-storey warehouse and distribution centre (12,568m²) which is located within 100m of the subject site. Given the proximity and size of the two proposals, the EIS should address the cumulative impact of the proposal may have especially as it relates to transport management and accessibility.

Council requests the EIS and any relevant technical documents be updated or recalibrated to take into consideration of the impact of the proposal and the recently approved warehouse and distribution centre on Baker Street.

6. Height

It is noted the proposal exceeds the 25m maximum Height of Building control on the middle portion of the site. Council raises no objection to the height exceedance, subject to all services and plant (excluding photovoltaic (PV)) being concealed from views from the public domain. This needs to be demonstrated in the future submission of additional information.

The Clause 4.6 variation request prepared by Willowtree Planning dated 15 November 2024 cites the incorrect Local Environmental Plan (LEP). Correct referencing of the Bayside LEP 2021 (BLEP 2021) is required.

7. Transport Related (Misc)

The proposal needs to make reference to the NSW Government South-East Sydney Transport Strategy (SESTS), as that document is specific to the Southeastern Sydney region and the Sydney Trade Gateway. This strategic transport document isn't currently referenced in the EIS.

Regarding pedestrian and cycling networks, the proposed pedestrian bridge and landscaped frontage to link the office space to the Wentworth Avenue shared path/cycleway is noted. Priority access for other areas of the development to this bridge and Wentworth Avenue access point should be considered. There is currently a gate access that provides access to the Wentworth Avenue shared path/cycleway and the adjacent bus stops.

The subject site is located at the intersection of EW12 (Wentworth Avenue) and NS9 (Banks Avenue) of Bayside Priority Cycleways and the (Mascot to Eastgardens) NSW Government Strategic Cycleway Corridors. As such the site has high potential for considerable active transport mode share by employees. This can be further explored in the development of the Green Travel Plan (GTP).

Regarding public transport, bus route 350 (Mascot to Bondi) is a high-frequency high-capacity service and with two bus stops located within 100m of the site. These stops are expected to be highly utilised and upgrades to these stops, possibly with shelters and accessible paths, will be required to adequately service the development. The site is 600m (7 minute direct walk) to the Eastgardens bus interchange. Path and public domain upgrade between the site and the Eastgardens interchange should be considered to enhance pedestrian amenity and utility of nearby public transport services.

Relating to on-site parking, Council acknowledges the 48 EV spaces provided within the development. Clarity is sought as to whether there will EV charging facilities on these spaces.

There is currently no inclusion of car share in parking allocation. Reference to the BDCP 2022 and provision of car share for commercial premises requires 1 car share space for every 1000m². Detail of this should be provided as part of the proposal with further detail outlined in the GTP. Location of the car share vehicles should be grouped together and in publicly accessible spaces (e.g. visitor parking areas adjacent to Moore Street).

8. Miscellaneous

- Appendix I Survey Plan does not include a site area. Please update the survey to include the site area of the site.
- There are no references on the architectural plans regarding the solar panel's mountings (flush or angled mounting). As a result, the visual impact of these panels cannot be assessed.
- Council requests clarification of the construction methodology of the perimeter road at the rear of site (Wentworth Avenue frontage), including detailing whether it is an elevated structure or on-grade structure for the service vehicles and how drainage will be managed with the interaction with the embankment.
- Council requests clarification of whether the lobbies and dock office spaces are included as the GFA for warehouse GFA or office GFA. This may have implications for the number of parking spaces required.