



Our reference: ECM: 9326999 & 9325201
Contact: Gavin Cherry
Telephone: 02 4732 8125

20 October 2020

Bruce Zhang
Email: Bruce.zhang@planning.nsw.gov.au

Dear Mr Zhang,

Response to Request for Comments on SEARs Proposal for the Oakdale West Estate - Modification 6 (SSD-7348 MOD-6) & Separate SEARs Proposal for Stage 3 Development of the Oakdale West Estate at 2 Aldington Road, Kemps Creek

I refer to the above SEAR's notifications both received on 8 October 2020. Thank you for providing Council with the opportunity to comment on the proposed development.

The following comments are provided for consideration in the assessment of both proposals:-

1. Comments on Amendment to Approved Concept Plan - Spatial Arrangement

It is noted that Modification 6 seeks to alter the detail contained in the approved concept plan, which is necessary to then inform the detailed design development separately proposed within the Stage 3 Development. As a result comments on the spatial arrangement of the built form and landscape zones applies to both SEAR's proposal.

The submitted Request for Sear's Report did not appear to provide a comparative diagram of the approved scheme in contrast and for comparison to, the proposed amended scheme. The EIS that is submitted with Modification 6 should ensure that an illustrative representation of the approved scheme is depicted in combination with the proposed scheme for comparison in the assessment process.

The proposed spatial arrangement of Lot 2A and the relocation of car parking from Estate Road 1 (north – south) to Estate Road 1 (east – west) raised no specific concerns provided the landscape setbacks secured within previous Modifications to the overarching concept plan are substantially reflected within this revised proposed. The majority of the car park in the setback for Lot 2A achieves a 7.5m setback to the front property boundary however some motorcycle parking encroaches at the western and eastern ends. While the encroachments are minor, opportunities to maintain an unimpeded 7.5m landscape setback for the entire boundary is requested, especially as the corners of the site end up being the most visually prominent on the approaches.

The car park and landscaped setback for Lots 2C and 2D, south of the Stage 2 development works are inadequate and undermines the streetscape outcomes secured through the Stage 2 Development works to the north. A front setback of 6.0m to 7.5m was established for the landscaped zone of the Amazon

Development and this setback must be continued for the full length of the block / Estate Road presentation. The suggestion of a significantly lesser setback for Lost 2C & 2D undermines the streetscape outcomes that were fundamental to the support of Stage 2, and sets up an irregular streetscape presentation between the developments. The plans in support of the SEAR's request also appear to reflect an incorrect setback line for the Amazon Development front car park, which needs to be checked and rectified if this is an error.

The car park configuration encroaching forward of the established setback pattern in the street requires amendment and may necessitate a reduction to gross floor or allotment yield if it cannot be otherwise made compliant.

Please also note that this concern has been raised directly with the developer detailing that established setbacks to the local road network is just as important to streetscape character as those setbacks identified to the primary link road.

2. Building Height Variation and Visual Impact Analysis

As was required for changes to building height for Stages 1 and 2 preceding this proposal, a visual impact assessment is required that considers the cumulative implications of further height variations to the DCP requirements. While the height increase is significantly less than that approved for the Coles and Amazon developments, the increase nonetheless requires an analysis of visual prominence and streetscape impact. It appropriateness will also need to be considered in the context of the landscape design at the street interfaces and throughout the car park / hard stand areas.

Stormwater Management & Engineering Considerations

The proposal has been considered by Council's Development Engineers and the following comments are raised for address in the preparation of the SSD application:-

- All stormwater drainage for the site must be in accordance with the following:
 - Council's Development Control Plan,
 - *Stormwater Drainage Specification for Building Developments* policy, and
 - *Water Sensitive Urban Design Policy and Technical Guidelines*.
- 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.
- The application shall include MUSIC modelling (*.sqz file) demonstrating compliance with Council's adopted *Water Sensitive Urban Design Policy and Technical Guidelines*.

Traffic Management Considerations

The proposal has been considered by Council's Traffic Engineers and the following comments are raised for address in the preparation of the SSD application:-

- 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 2E is not supported due to the conflict with heavy vehicles. A separate entry / exit to the car park is to be provided from a public road.
- The Traffic and Transport Impact Assessment shall address all internal vehicle movements, including turn paths for B-Doubles.
- All traffic and parking shall be in accordance with AS2890.1, AS2890.2 & AS2890.6
- All vehicular access to the site, including construction traffic, should utilise the soon to be completed Western North South Link Road for access to the site.
- 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 Plans.
- 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 Plans.
- 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 No 2E is not supported due to the conflict with heavy vehicles.

- 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) C10 and other Council guidelines.
- 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.
- 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).
- 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.
- All vehicle are to enter and leave in a forward direction.
- 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.
- 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



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Should you wish to discuss any matters further and allow for further dialogue as requested between officers, please do not hesitate to contact me on 4732 8125.

Yours sincerely,



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