



Our reference: ECM: 9783432  
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12 November 2021

Department of Planning, Industry and Environment  
Attn: Bruce Zhang

Email: [Bruce.Zhang@planning.nsw.gov.au](mailto:Bruce.Zhang@planning.nsw.gov.au).

Dear Mr Zhang,

**Request for Advice – Request for Further Information for Oakdale West Estate Stage 3 - SSD-9794683 at 2 Aldington Road Kemps Creek**

I refer to the Department's request to provide comments in relation to the above State Significant Development (SSD) application. Thank you for providing Council with the opportunity to comment.

Council was provided access to the application documentation via the NSW ePlanning Portal and was also provided a copy of an amended package of documentation and associated cover letter dated 9 November 2021, prepared by Kelan Consulting. The applicant has advised in the 9 November cover letter that the minor amendments to the proposal are to facilitate a tenant's operational requirements. (Council has been advised that the additional material will be uploaded to the Portal in due course).

The following comments are provided having regard to the above-mentioned material, for the Department's consideration in assessing this application.

**1. Planning Considerations**

**(a) Proposal**

The SSD application (SSD 9794683) and supporting EIS, as originally lodged, sought approval for:

- Construction, use and fit out of Buildings 2A, 2C and 2D within Precinct 2 of the Oakdale West Estate including associated office space,
- Provision of onsite parking, and
- Associated landscaping and signage.

Council understands that the key amendments to Building 2A include:

- A reduction in site coverage and building footprint and additional 8,403sqm mezzanine,
- A reduction in overall Gross Floor Area (GFA) and a 1.2 m reduction in ridge height from 14.9m to 13.7m,
- Amended access for cars and trucks and alterations to peak traffic generation and movements, and changes to total daily vehicle movements,

- The addition of 47 additional car parking spaces (from 208 to 255 spaces) and repositioning of the carpark to the eastern side of the site, and,
- Use of temperature control at the southern dock with units placed on the warehouse roof.

And that the key amendments for Buildings 2C and 2D include:

- The separation of staff and visitor access and heavy vehicle access by the relocating of car parking from the north of Building 2D to the south fronting future Southern Link Road,
- Amendments to increase hard stand at the easter corner of the site and provision of an internal driveway parallel with future Southern Link Road to allow car and fire truck access around the southern side of the buildings,
- Increase in overall site coverage of 2%, to 45%, and an
- Increase of 3 car parking spaces (from 50-61)

Amendments proposed for Building 2D, in particular are:

- In increase of 855sqm (17%) of building footprint,
- One additional car parking space (from 55 to 56 spaces),

## **(b) Planning Matters**

### Introduction of roof mounted plant machinery

The Department is to be satisfied that the proposed maximum heights of the buildings inclusive of roof mounted mechanical plant is below 20 metres are measured from Natural Ground Level. Maximum heights, inclusive of rood mounted plant is to be shown on plans.

### Introduction of driveway along southern elevation of Buildings 2C and 2D

Whilst it is acknowledged that the proposal has been amended to respond to safety issues raised regarding shared vehicle access points, it was not intended by these comments, that the safety issues would be resolved at the expense of proposed setback landscaping which was previously considered satisfactory.

Council does not support the location of the internal driveway being within the 20m landscaped front setback previously proposed.

Should the Department accept the proposed amendments, Council strongly recommends that larger scale more substantial blister islands within the car parking hard stands be introduced along the frontage.

This is considered to be achievable, noting the proposed increase in the number of car parking spaces across all three warehouses. Council's DCP requires that hard stand car parking space are designed with landscaping which would allow for one canopy tree for each 6 spaces. This should be the

minimum target. This will allow the development to better align with the Premiers Priorities for minimum canopy targets.

It is also recommended that a round-a-bout landscaped blister island with feature tree (or trees) be provided within the north-eastern car park hardstand proposed to the east of Building 2D. This area is overdesigned for the needs of the development and the extent will present poorly to the street and broader estate.

Additional car parking for building 3A.

The addition of 47 spaces will need to be justified as car parking requirements are met and the extent of the associated car parking hard stand is excessive in the re-arranged layout.

If the Department is in support of this aspect of the proposal, it is requested that landscaped blister planting with canopy (shade providing) trees is provided at greater intervals, with more substantial blisters at aisle ends or in strategic locations (taking into consideration orientation, shade direction, views and amenity).

**(c) Landscape Considerations**

A greater number of street trees are required, and planting along future Southern Link Road is to be elevated in quality and must be engineered, installed and planted by qualified and experienced landscape consultants to avoid unsustainable outcomes and a detracting frontage (noting the extensive cut and fill, and site compaction undertaken) as has been further detailed below.

As noted above, Council does not support the reduction in landscaped area to the future Southern Link Road, noting that the original plans included landscaping over the full 20m setback.

Should the Department support the reduction in landscaping along the frontage of the site to Southern Link Road, Council strongly recommends that larger scale landscape blisters be introduced to the car parking proposed along this frontage at a minimum of 1 in each 6 spaces, the loss of car parking spaces is considered acceptable (and is encouraged) to facilitate this outcome.

This is considered to be essential to ameliorate the increased impacts of bulk, scale and overbearing owing to the reduced landscaped setback, and to screen the view to hard stand loading and service areas.

The RRFI Dated 18 October 2021, prepared by Keylan Consulting does not include any response to landscape matters raised by Council in its letter dated 19 March 2021. Matters raised in this letter are reiterated and remain relevant to the amended proposal's building and landscaping layout, noting that the originally proposed landscaping along the Southern Link Road is considered to be superior.

Further, Section 05 on landscape plan no. L.SK.202 revision C indicates the landscape setback to the future Southern Link Road is 6.579m wide exclusive of the proposed internal driveway kerb and proposed catch drain.

This is not consistent with the landscape plans which indicate 7.150 landscaped setback.



Previously raised landscape considerations are summarised below:

- As has been requested in preceding stages, continuous canopy street tree plantings in organic mulch is required for maximum shade and cooling, and to satisfy Council's Cooling the City Strategy.

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 northwest 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.

- Documentation submitted indicates discrepancies between sections and plans (i.e.. retaining walls on Southern Link Rd). The plans require 2qa verification to ensure that the landscape plan, landscape sections and architectural drawings are reflecting a consistent built form and streetscape outcome.

- The extent of canopy and density of planting within the setback to the South Link Road is inconsistent with verge treatments along this road corridor. Density and diversity of tree and shrub (medium and tall) species should be increased and retaining walls fully screened so the effect is dense and informal, and biodiversity maximised.

It should also be noted that hedges in this location are not supported by Council's Landscape Architecture Team.

- Tree plantings in the pavement at Lot 2D and carpark areas were previously supported, provided that a suitably qualified and experienced arborist specifies the engineered tree pit details including structural soil volumes and materials, based on proposed species. This was suggested so as to ensure the best possible growing conditions for long term tree health and viability (refer sheet LSK.200)
- Section 03/LSK.202 is misleading in terms of retaining wall height. Spot levels indicate a change in level of approx. 8m. The section shows a wall height of approx. 2m. All retaining walls and fences on top of walls, seen from the public domain, should be densely screened to reduce visual impact and create microclimates suitable for plant growth e.g. not radiated heat from wall materials.
- With respect to Estate Road 1 (Sepia), increased shrub and screening is required to maximise streetscape amenity and reduce visual access to roadways and vehicles /trucks
- Organic mulches should be used for soil improvement and plant health, not inorganic mulches such as basalt. This could be addressed via conditions of consent applied by the Department.
- With respect to the raised feature treatments with gabion walls, an arborist must inform and determine suitable dimensions of soil volumes and other treatments to ensure the best possible growing conditions for long term tree and plant health and viability (refer sheet LSK.201)
- The proposed extent of cut and fill requires a reconstruction of soil profiles to enable planting to establish and thrive in the long term. Details have not been provided. Planting into fill and sub-soils without amelioration and reconstruction will result in stunted, unhealthy and compromised vegetation.

### **Environmental Management Considerations**

The Oakdale West Estate Buildings 2A, 2C & 2D Noise and Vibration Assessment (**NVIA**) prepared by RWDI Wilkinson Murray and dated 19 October 2021 identifies that:

- The NVIA proposes and assesses construction noise impacts based upon standard construction hours whilst the letter written by Keylan Consulting Pty Ltd and dated 18 October 2021 advises that construction of Building 2A will occur between the hours 6am-10pm Monday-Sunday with internal concrete pours occurring within the building from 3am-10pm.

It is recommended that the Department seek clarity in relation to the proposed hours and is to be satisfied of the NVIA recommendations on this basis.

- It is raised for the Department's consideration that the documentation includes reference to MOD7 SSD 7348 but does not reference MOD8.
- It is also raised for the Department's consideration that the NVIA makes assumptions for operation of mechanical services and fixed plant that have not been finalised due future tenancy unknowns.

This will need to be considered and reviewed as development and occupancy of the Estate progresses with mechanisms established to implement mechanical plant and equipment operational limitations and ensure compliance with noise criteria.

## **2. Development Engineering Considerations**

### **Lot 2A**

The architectural plans for Lot 2A (SBA, ref 21110, rev H, dated 21.10.2021) are inconsistent with the civil engineering plans (AT&L, ref 15-272, rev B, dated 18.10.2021) and plans in the Transport Assessment report (Ason Group, ref P1518r01v5, rev 5, dated 18.10.2021). The car parking layout and access driveway locations as shown in the engineering plans and traffic report differ from the architectural plans.

The northern heavy vehicle access driveway along Road No 3 (Emporium Ave) proposes conversion of an existing kerb inlet pit into a butterfly grate within the driveway which is not supported on safety grounds for maintenance access and to the additional 'wear and tear' caused by heavy vehicles driving over the grate. It is suggested the driveway be relocated a minimum of 1m from the kerb lintel.

It is noted the traffic assessment report shows this access is proposed for a 12.5m HRV, however the driveway width appears to have been designed to cater for articulated vehicles without any turn paths supplied to substantiate the width. Access driveway widths for heavy vehicles shall be in accordance with AS2890.2 - Clause 3.4 and Figure 3.2. Fully dimensioned plans and vehicle turn paths are to be provided for each access driveway demonstrating compliance.

Access driveway widths for passenger vehicles shall be in accordance with AS2890.1 - Clause 3.2.1, Table 3.1 and Table 3.2. Fully dimensioned plans are to be provided demonstrating compliance.

Any driveway shall be located a minimum of 1m from the lintel of any kerb inlet pit.

### **Lot 2C & 2D**

The access driveway for passenger vehicles for Lots 2C & 2D (off Road No 3 – Emporium Avenue) is shown as 9.5m wide. Access driveway widths for passenger vehicles shall be in accordance with AS2890.1 - Clause 3.2.1, Table 3.1 and Table 3.2. Fully dimensioned plans are to be provided demonstrating compliance.

Turn paths for the left turn movement out of the heavy vehicle access driveway onto Road No 3 (Emporium Avenue) are to be included. Turn paths are to be shown for a 26m B-Double (PBS Level 2 Type B). Road No 3 will ultimately connect to the future Southern Link Road which will become the main access route to the site.

Any driveway shall be located a minimum of 1m from the lintel of any kerb inlet pit.

### **3. Traffic Management Considerations**

- The applicant proposes for 30-metre-long super B-Doubles to access the site, however it is raised that the Oakdale West Estate roads are only designed to cater for 26 metre long B-Doubles. Therefore, the use of super B-Doubles or any other heavy vehicle larger than a 26 metre B-Double is not supported.
- The gates to the site should be located so that the largest vehicle is contained within the boundary of the site when the gate is closed.
- There should 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.
- 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.
- To allow a thorough assessment of the development by the Department, plans are to 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.
- Council recommends that 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.
- Council would require that all vehicles are to enter and leave in a forward direction.
- Appropriate signage, visible from the public road and on-site shall 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.



4. **Biodiversity Considerations**

Council recommends that the proposed plant species *Eucalyptus amplifolia* is swapped for *Eucalyptus tereticornis* (as this species is usually associated with riparian and areas that are prone to inundation) and that proposed species *Corymbia eximia* is swapped with *Angophora bakeri* as *Corymbia eximia* would be out of place and may not be suited to the environment it is planted into.

5. **Review Advice Summary**

With the exception of the landscape response, there are no major objections raised in relation to the building amendments and subject to the recommendations included above and due consideration of the matters raised herein.

Should you wish to discuss any aspect of Council's comments further, please contact me on (02) 4732 8567.

Yours sincerely



Kathryn Saunders  
Principal Planner