



Our reference: ECM Ref: 9567506  
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13 May 2021

Bianca Thornton  
Email: [bianca.thornton@planning.nsw.gov.au](mailto:bianca.thornton@planning.nsw.gov.au)

Dear Ms Thornton,

**Response to Request for Advice: SSD-9522 Mod 1 – Modification  
Application and Report for the Kemps Creek Warehouse, Logistics and  
Industrial Facilities Hub at Nos. 657 – 769 Mamre Road Kemps Creek**

I refer to the Department's request to provide comments in relation to the above modification application. 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.

**Planning and Design Considerations**

- The landscape setbacks approved within the previous application should not be diminished as a result of this modification. Council has maintained that minimum 6m landscaped setbacks are necessary to achieve the aims and objectives within the draft Mamre Road Precinct DCP despite the suggestions that 3.75m setback are possible. This results in poor streetscape outcomes that does not sufficiently screen or ameliorate the mass and scale of the developments being pursued in this precinct which are large scale warehouse and industrial buildings with extensive hard stand parking areas in front setback. The minimum setbacks to local internal roads as approved in the preceeding determination was 4.0m and this must be maintained. Refer to the approved Landscape Plan Cross Sections (notably Section B-B) for confirmation of the 4.0m setback requirement.
- The architectural plans submitted have identified the draft DCP setback standard of 3.75m on various lots however the approved setbacks are 4.0m in the preceding determination and this 4.0m setback should be reinforced with the applicant as the minimal allowance. It is however noted that the 4.0m setback line is correctly reflected for the allotments north of Bakers Lane and the future Southern Link Road.
- There are proposed landscape setback non compliances with Warehouse Lot 6 at corner points of car parking spaces which is only acceptable if the majority of the landscape setback significantly exceeds the approved minimum 4.0m in depth. There are also proposed non compliances with hardstand areas around the pump room, rainwater tank and hard stand areas which are only setback 3.75m from the road property boundary. This

must be amended to be no less than 4.0m as was approved and established as the minimum setback for this estate.

- The proposed setback of Warehouse Lot 8 car parking / hard stand to the rear internal road is only 3.75m which is unacceptable, contrary to the previous approval and must be amended to reinstate the required and approved 4.0m setback between car parking and the property boundary.
- Concern is raised with the lack of architectural design and articulation relief for the proposed building form on Proposed Lot 5. Given the length and overall scale of building form is substantially greater than that proposed on all other allotments, this built form must be designed to achieve design quality over and above what is expected for a small / medium scale industrial warehouse building. Council has been involved in pre-lodgement discussions on a future proposed data centre on the southern most allotment in this estate which is of size and scale similar to what is proposed on lot 5 however the building form has demonstrated substantially greater address and consideration to landscape setbacks, external colours and materials and design. The built form and materiality as proposed in this application is considered inadequate to ameliorate the mass and scale of the development and further design amendments are necessary to improve the built form as viewed from the future link road and Mamre Road. Note: Warehouse 3 & 4 has a building design with greater consideration to colours and materials than what is suggested on proposed lot 5.

## **Traffic Management and Road Design Considerations**

### Access to Proposed Lot 1, 4 & 11

- The Masterplan by Altis Frasers (drawing No SSD-MRM-MOD-001, revision K, dated 06.04.2021) and the Overlay Plan by Altis Frasers (Job MP-MRM-FS-052, revision A, dated 17.02.2021), conflicts with the Functional Layout Plan by Costin Roe (drawing No C013362.01-SK28, issue A, dated 09.04.2021) with regards to access to Lots 1, 4, & 11. The Masterplan and Overlay plan depicts a central median around the bend in the road between Bakers Lane and the Public Access Road with access to Lots 1, 4 & 11 being left-in and left-out. The Functional Layout Plan by Costin Roe shows a dedicated, part sheltered, right turn bay into the various driveways of Lots 1, 4 & 11. The sheltered median has four breaks and small median 'nibs' to permit right turn access into the four separate driveways to access Lots 1, 4 & 11. The right turn bay on the bend with four breaks and small median 'nibs' along the sheltered median is not supported on safety grounds as a means for access into the subject lots. Alternative access for these lots, such as a roundabout at the internal 'T' intersection further to the south, is considered necessary and should be addressed via revised plans which are resubmitted and notified to Council for further comment.

### Cul-de-sac arrangement with Access Road 2

- Regarding Council's previous request for a central median within Access Road 2 (Teardrop cul-de-sac), the applicant has advised that a median can be accommodated however the 300mm wide median as proposed is not supported as it does not comply with the minimum standard of 1.2m wide. Council requires a minimum 1.2m wide median with widening of the



road reserve from 24m (pavement of 15m) to 25.2m with a 16.2m wide pavement (includes the 1.2m median). The median should be widened to 2m at the intersection with Access Road 1 to accommodate pedestrians and cyclists.

### Landscape Design Considerations

- The following species are considered unsuitable because they do not perform well in this region. Alternative species should be nominated that are climate and contextually appropriate to replace the following:
  - *Angophora costata* – coastal species, unsuitable for Western Sydney
  - *Westringia fruticosa* – proposed for carpark and office tree planting – this is a shrub not a tree
  - *Elaeocarpus reticulatus* – susceptible to frost in Western Sydney
- Boundary setbacks as shown in sections are dominated by shrubs with minimal medium sized trees. Large trees are required to maximise canopy cover and achieve shading and cooling objectives. The planting palette and landscape design should be amended to address this.
- The proposed Mamre Road setback also requires larger trees for improved canopy cover. It is recommended that 50% of trees nominated should each have an effective height of 15m at maturity and species could include *E. moluccana*, *E. tereticornis*, *A. floribunda*. Ideally 100% canopy cover is recommended for the boundary setback and Mamre Rd setback with canopy extending beyond these zones to provide shade onto internal and external road and pedestrian pavements. The planting palette and landscape design should be amended to address this.
- Detailed typical plans should be provided as a minimum to demonstrate the density of trees and extent of canopy coverage, which cannot be expressed in typical sections or colour coded tree strategy plans.

Design of roads should consider the Western Sydney Street Design Guide to maximise shade and cooling in the public domain. Road cross sections should also reflect position of path in the verge being closer to the boundary and increasing the area / width for tree planting

- From a landscaping perspective, section AA (sheet 6) should include a shared path rather than separated path to increase the planting width for large trees. A 2m width is unsatisfactory and will likely result in damage to path infrastructure
- Section BB (sheet 7) indicates street trees between the path and kerb which is unrealistic.

Should you wish to discuss any aspect of Council's comments further, please do not hesitate to contact me on (02) 4732 8125.

Yours sincerely

**Gavin Cherry**  
**Development Assessment Coordinator**