



Our reference: ECM Ref: 9696081  
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30 August 2021

Department of Planning, Industry and Environment  
Attn: Deana Burn  
Email: [deana.burn@planning.nsw.gov.au](mailto:deana.burn@planning.nsw.gov.au)

Dear Ms Burn,

**Response to Request for Advice: SSD-7348-Mod-7 Oakdale West Estate  
Modification 7 at 2 Aldington 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.

**1. Planning and Design Considerations**

While no specific concerns are raised in response to planning, traffic or engineering design considerations, the following key aspects are requested to be carefully considered in the assessment:-

- The appropriateness of the proposed increased finished ground levels with respect to adjacent properties. The SEE makes reference to a maximum of 700mm which is believed to be up to 800mm of additional fill. The resulting interface treatment at the boundaries of the estate should be carefully considered.
- The proposal indicates additional filling works within the transmission easement. Referral to and agreement from the relevant authority (assumed to be Transgrid) is considered necessary to ensure that the fill and amended finished ground levels will not impede access to and maintenance of the infrastructure

**2. Landscape Design Considerations**

The following comments are raised for consideration and address via the provision of amended landscape design plans:

- The final sheet (L.SK.200 – landscape sections) in the landscape set of drawings was not available and is requested to be provided to Council for consideration.
- As has been requested in preceding stages, continuous canopy street tree plantings in organic mulch is required for maximum shade and cooling to satisfy Council's Cooling the Cities Strategy and NSW Greener Places Guide. The spatial arrangement of street tree planting is



inadequate, as continues to be indicated in the concept plans submitted within each stage. 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.

- Shrubs and groundcovers are not acceptable in street verges as they compromise visibility and safety. They would not be maintained by Council. This is standard practice for Penrith City Council verges and the plans must be amended accordingly.
- Street tree species are to be amended – the following species are oversized for the width of verge and in time will compromise and damage adjacent infrastructure: *E. tereticornis*, *E. punctata*, *E. moluccana*, *E. fibrosa*, *A. floribunda*, *E. crebra*. Tree species are to be appropriate for the location and site conditions (available rootzone volume, soils, microclimate etc). Alternative species are required. A diverse mix of species is supported for increased biodiversity, resilience, wayfinding and amenity. The applicant is encouraged to liaise with Council's Assets Team for tree species advice. Maximum mature height of 15m is recommended. Alternatively conditions of consent could be included requiring agreement from Council on the selection of street tree planting species to be utilized.
- Street trees should be planted as individual trees in mulched areas and spaced apart so that mature canopies touch. As a result, there will be a continuous canopy in the street. Adjust spacings to suit overhead street lighting and driveways.
- Organic mulches should be used on soils under planting, which contribute to soil improvement, water retention and plant health. Inorganic mulches such as basalt and sandstone do not offer these benefits and in some cases can attract and trap heat around rootzones which should be cooled. This could be addressed via conditions of consent.
- Any raised feature treatments require an arborist to 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
- Areas of cut and fill require a reconstruction of soil profiles to enable planting to establish and thrive in the long term. Planting into fill and sub-soils without amelioration and reconstruction will result in stunted, unhealthy and compromised vegetation.
- Unless required as a result of bushfire hazard assessment, groundcovers and shrubs should be planted on embankments for biodiversity and screening eg. Northern boundary embankment which is currently shown as only native grasses under trees.



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

Yours sincerely

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