



Our reference: ECM Ref: 9772045
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Department of Planning, Industry and Environment
Attn: Rebecka Groth
Email: rebecka.groth@planning.nsw.gov.au

Dear Ms Growth,

**Request for Advice - EIS - Access Logistics Park SSD-17647189 at No. 884
– 928 Mamre Road Kemps Creek**

Reference is made to the recent request to provide comments in relation to the above State Significant Development Application under assessment by the Department of Industry, Planning and Environment (DPIE). Thank you for providing Council with the opportunity to comment.

The following review advice is provided for the Department's consideration in relation to its assessment of the application.

1. Planning Considerations

(a) The Proposal

Council understands that the proposal relates to a State Significant Development Application, being SSD 17647189, which has been lodged with the Department of Planning, Industry and Environment (**DPIE**).

The proposal includes the construction and operation of a warehouse and distribution facility/hub comprising:

- Demolition of existing dwelling houses and associated outbuildings,
- Bulk earthworks involving dam dewatering, cut and fill works and pad construction,
- A two-stage, 16-lot Torrens Title subdivision of the land,
- Construction of internal public estate roads of 24.0m and 26.4m wide and connections to existing and future local roads (including Mamre Road intersection works),
- Stormwater and drainage work including construction of onsite detention and bio retention basins,
- Landscaping of bio retention basins and street tree planting,
- Infrastructure comprising civil works and utilities servicing,
- Construction of one warehouse and distribution facility in Proposed Lot 2 with a GFA of 37,800sqm,
- Construction of retaining walls on the northern, southern and eastern boundaries,
- Construction of temporary acoustic barriers, and

- Erection of signage.

The applicant's Environmental Impact Statement (**EIS**) includes that:

- Lot 1 is located along the Mamre Road frontage and is reserved for an On-site Detention (OSD) storage area, bio-retention basins and supporting infrastructure.
- Lot 3 is reserved for the future Mamre Road upgrades to be undertaken by Transport for NSW (TfNSW).
- Built forms of the warehouse developments in Proposed Lots 5 to 16 would be subject to separate development consents, based on customer demand and operational requirements.



Image 1: Excerpt from EIS, Figure 11 – Masterplan / Benching Plan – Stage 2 (p.25)

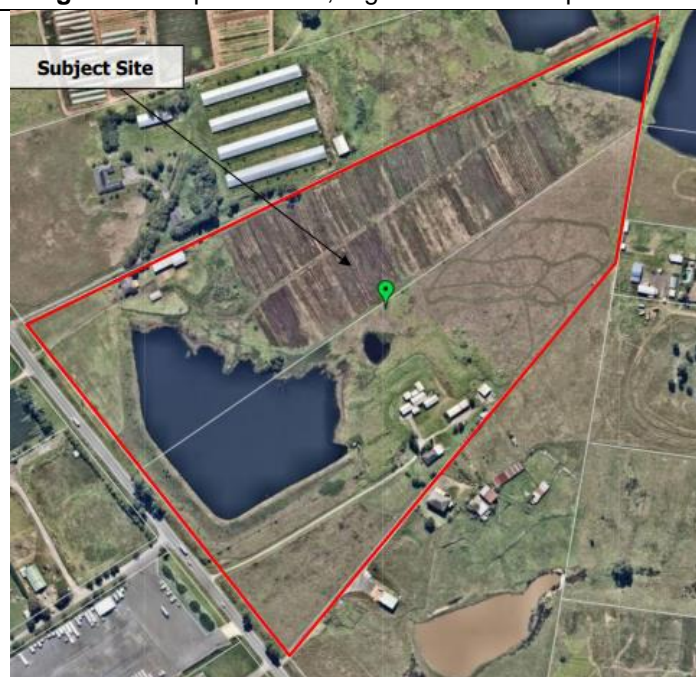


Image 2: Subject site, excerpt from EIS.

(b) Contributions

Council's City-wide Section 7.12 Contributions Plan no longer applies to the Mamre Road Precinct and as such, a contributions plan is not in place for the land.

At the time of writing, a Voluntary Planning Agreement would need to be entered into with the relevant authority, in relation to contributions. It is noted that a Draft VPA Offer accompanies the EIS. This document has not been reviewed by Council.

(c) Major Objections - Stormwater, Traffic, Waterways and Engineering

Council's various engineering experts have reviewed the proposal and raise strong objections to the poor outcomes which will likely eventuate should the proposal be supported with its current design and layout.

Detailed comments are provided below for the Department's consideration in relation to the objections and concerns raised on each aspect (traffic and stormwater engineering, water quality, levels and landscaping).

DPIE is strongly encouraged to require that the applicant suitably resolve the traffic, stormwater, water quality, levels and landscape issues raised. It is recommended that the applicant clearly indicate the ultimate of final Mamre Road (widened) alignment on all affected plans and sections (including on Section 1 - refer **Image 3** below). Documents are to detail the interim and ultimate/final roadway designs.

It must not eventuate that the interim design and layout (pre-Mamre Road widening) is based on the minimum requirements of the DCP (setbacks, levels and landscaping), such that the ultimate outcome is substandard and ineffectual.

Council raises for the Department's consideration that the proposal is considered inadequate in its engineering design, water quality and landscape outcomes, such that in its current state the design will not be sustainable, and result in detrimental impacts in neighbouring sites and on the quality and presentation of the development within the Precinct (refer **Images 3 & 4** below).

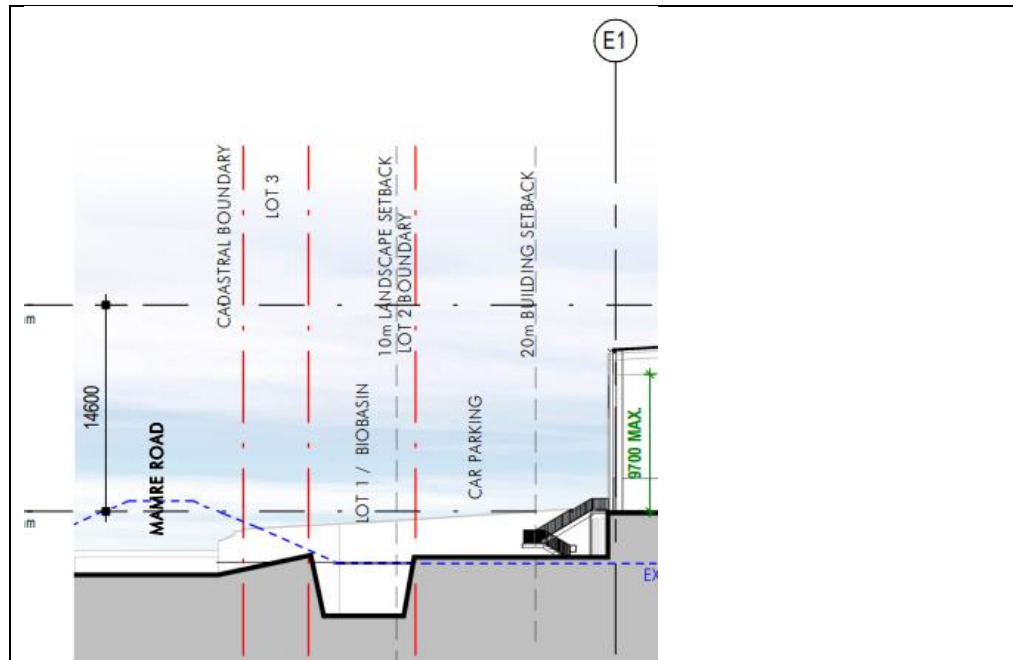


Image 3: Excerpt from Architectural plans – Section 1 Mamre Road

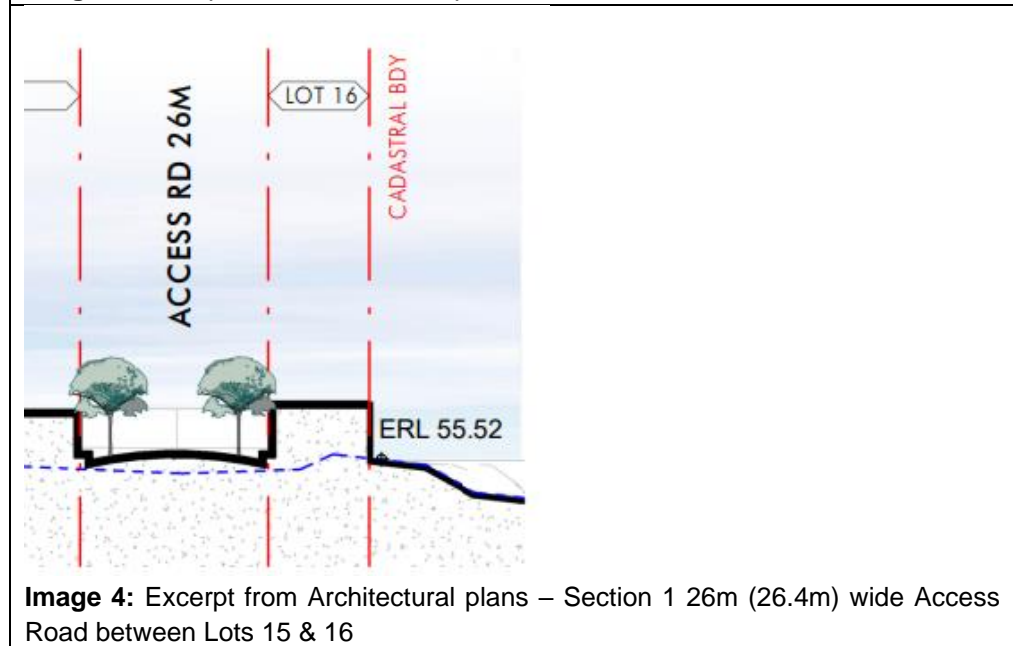


Image 4: Excerpt from Architectural plans – Section 1 26m (26.4m) wide Access Road between Lots 15 & 16

(a) Retaining Walls

All retaining wall heights, setbacks, landscaping requirements and locations shall be consistent with the Draft Mamre Road DCP requirements at section 4.4.1 Development on Sloping Sites.

Sections indicate that Estate roads are proposed in deep areas of cut with high retaining walls hard up against the roadway boundary (example refer **Image 4** above). In relation to the levels proposed at image 4, it is not understood why Lot 16 is filled when natural ground level is consistent with the roadway.



DPIE is advised that Council will reject dedication of local roads proposed in this arrangement owing to asset management implications, safety and amenity reasons.

The Draft DCP includes that level transitions are to be managed between lots and not interface the public domain. In accordance with section 4.4.1 of the Draft DCP, finished ground levels adjacent to the public domain or public road dedication, be no greater than 1.0m above the finished road level (or public domain level).

The Draft DCP includes that where a level difference must exceed 1m the landscaping and retaining walls are to be stepped back within the private lot and also required that walls up to 3m in height are to be setback 2m into the property boundary.

Street tree and verge planting will require careful design, engineering and consideration to be sustainable in the long term. Soil quality and compaction in subterranean roadways.

It is raised for the Department's consideration that all high retaining walls will require fencing for safety reasons, which has not been indicated on plans.

Landscape plans do not correlate with civil and architectural plan sets.

(b) Draft Mamre Road Precinct Development Control Plan (DCP)

The proposed development is advancing ahead of the finalisation of the exhibited Draft Mamre Road Precinct DCP.

As the Draft DCP is yet to be finalised, it is raised as a concern that the strategic planning controls and objectives for the Precinct are not yet confirmed and early advancement of development proposals ahead of this process, has the potential to undermine orderly development within the Precinct.

It is appreciated that this is ultimately a matter for the NSW Government to address in the consideration of any SSD application lodged, however Council will maintain that there is a need to consider the appropriateness of site specific DCP advancing independently, and how such a DCP is contextually responsive to existing land attributes and the strategic planning vision for the broader precinct.

(c) Precinct Entry Statement

Council strongly recommends that all major precinct entry intersections are to be provided with higher order landscaped setbacks and treatments including an entry feature each side of the roadway, such as stonework, landscaped feature or public art installation.

Council strongly recommends that main Precinct entry intersections are provided with a wide landscaped central median to accentuate the entry, to

increase amenity and deliver the desired high quality landscaped precinct outcomes envisaged by the DCP.

(d) Lot Layouts and Landscape Presentation

Lot 13 must be redesigned to remove direct access of the Distributor/Collector Road to the south. Access for Lot 13 must be provided off a local estate road.

The orientation of the large warehouse proposed on Lot 2 (refer **Image 1**) is such that its longest and unarticulated elevation presents as one continuous bulky wall to Mamre Road, close to a proposed main Precinct entry intersection. The office location near the intersection is supported, although greater canopy tree planting and layering of landscaping is encouraged.

Council recommends that a far greater landscaped setback, inclusive of mounding be provided to Mamre Road as this warehouse will present poorly to the street with limited and ineffective landscaping proposed – which will be further eroded when Mamre Road is widened (as is planned) and owing to the proposal into locate deep on-site detention in this front setback surrounded by retaining walls (which is not supported by Council as detailed further below).

Council recommends that DPIE require the highly visible (edge location) warehouses to adopt higher quality or more creative architectural cladding treatments.

(e) Tree Canopy

The Draft DCP requires canopy tree planting to meet particular targets and to contribute the Greater Sydney Region Plan of 40% tree canopy for Sydney.

Canopy trees in wide landscaped blisters are to be provided to all car parking areas at a rate of 1 blister per each 10 spaces minimum, although a rate of 1 in 6 is preferred. This is not achieved across the development and must be provided to reduce heat island effects in the Precinct.

A landscaped and high amenity covered outdoor staff area is to be provided for staff, in a convenient location, close to the office.

(f) Materials and Finishes of Warehouses

The submitted Access Estate Architectural Design Report by Nettletontribe, September 2021, Rev D, includes two pages of Architectural Expression images which indicate high design quality which is not carried over into the proposed architectural elevations (refer **Images 5, 6, 7 & 8** below).

Council requests that DPIE require the adopting of the higher quality façade treatments for the larger scaled and more highly visible warehouses, such as those adjacent a main signalised Precinct entry, and with frontage to Mamre Road. Coupled with the requested high quality central landscaped median at the signalised main entry points, this will improve the quality and character of the Precinct in accordance with the Draft DCP vision, objectives and controls.



Image 5: Excerpt from Access Estate Architectural Design Report by Nettletontribe



Image 6: Excerpt from Access Estate Architectural Design Report by Nettletontribe



Image 7: Excerpt from Access Estate Architectural Design Report by Nettletontribe



Image 8: Excerpt from GeoScapes VIA Report



Further to the above, the scale and number of unscreened fire exit staircases along the frontage of the site to Mamre Road (or visible from Mamre Road) will likely poorly impact on streetscape. The fire stairs are not adequately integrated into the built form or their appearance addressed through other design solution.

(g) Setbacks

The proposed development must comply with the landscape setback requirements of the soon to be made Draft DCP. It is unclear if the required 10m landscaped setback to Mamre Road is provided post widening of Mamre Road.

As has been raised with the applicant in a pre lodgement meeting held 15 April 2021 (PL21/0023), the suggested landscape setbacks between the front property boundary (primary street and secondary street setbacks) as included in the draft Mamre Road Precinct DCP are not supported by Council and are considered inadequate to achieve necessary streetscape outcomes given the abundance of hard stand parking areas proposed within the front setbacks.

The current concept plans indicate an inadequate setback to Mamre Road and it is unclear what areas will remain in private ownership after the planned widening of Mamre Road occurs. This must be made clear and landscaping assessment undertaken requiring compliance with the DCP.

In relation to internal landscaped setbacks, it is reiterated that Council has continuously advocated for 6m minimum landscape setbacks where extensive car parking is proposed forward of a building line and this position has been put to the NSW Government in response to the exhibition of the Draft DCP. The landscaping shall not include hard stand areas.

If the indicated setback zone is not increased to 6m, then the layering of street tree plantings in combination with setback plantings will be of critical importance, as will finished ground levels relative to the finished levels of the public domain. Opportunities to mound the landscaping must be explored noting that this may be challenging in a 4.0m setback zones.

It was detailed to Council in the pre lodgement meeting, that benching of lots will occur within the subdivision arrangement, without the roadway being the point of level transition. This was thought to be of benefit and was raised as being critical as retaining walls in the front setback zone will necessitate wider landscape setbacks and potentially tiering, to achieve a suitable streetscape outcome. Submitted plans indicate roadways with high retaining walls hard up against the boundary line, flanking each side. The level change is to be addressed within the boundary of each lot.

The following aspects were also identified in Council's previous advice, for continued consideration and address identified:-

- The residue land (identified as Lot 16 being 767sqm in area) adjoining the southern boundary is not identified as road reserve and its form and function is not yet explained.
- Lot 8 does not comply with the frontage requirements in the Draft DCP that excludes the cul-de-sac head from the 40m frontage calculation. While this is not a specific concern to Council, the reason for this standard should be discussed with DPIE. Narrow access handle frontages off a cul-de-sac head will not be supported by Council due to driveway abundance and nil street tree capability however the proposed arrangement of Lot 8 is not presenting this outcome.

2. Traffic Considerations

- (a) The road network arrangements must correlate with the Draft and then ultimate networks detailed within the Draft Mamre Road Precinct DCP. The network must also correlate with adjoining lands and the development of roads, Precinct Road networks, Freight roads, verge widths, driveways and footpath works, drainage works, street lighting, public utility provisions and other civil infrastructure works within the road reserves.
- (b) Further Traffic Engineering Referral Response comments on the SSD documents are:
 - The SSDA must address and be further detailed and reviewed by DPIE, TfNSW and in consultation with Council to ensure a suitable fit with the ultimate Mamre Road Precinct road network, collector and arterial road network and intersections including adjoining land and developments, Aldington Road/ Southern Link Road/ Bakers Lane / Abbotts Road/ Mamre Road, trunk drainage systems and civil infrastructure ultimate design delivery plan and works / contributions that may be required from this SSD.
 - Full ultimate collector and arterial road network and intersections including Mamre Road, Freight Road, development site and adjoining site roads, Aldington Road/ Aldington Road extension to Southern Link Road and the extension south of Abbotts Road to Mamre Road / Abbotts Road / Southern Link Road / Bakers Lane, trunk drainage systems and civil infrastructure design and construction design and works delivery plan and fit of this SSD is required prior to development.

This should include works delivery plans by State Government, DPIE, TfNSW and developers and include key road network links including Mamre Road, Freight Road, Southern Link Road, Bakers Lane, Aldington Road (and links northern to Southern Link Road and south past Abbotts Road to Mamre Road), Abbotts Road and Mamre Road.

Council's roles and responsibilities on this Mamre Road Precinct rezoning, road, drainage and civil infrastructure delivery and development are yet to be resolved and so further direction should be sort from

Strategic Planning/ Council/ DPIE/ State Government prior to any development being accepted in this precinct.

3. **Development Engineering Considerations**

(a) **Estate Roads**

- Estate Road 1 has been shown as a Local Industrial Road with a 24m road reserve. The Draft Mamre Road DCP shows any connecting road with a signalised intersection with Mamre Road to be a 'blue' High Order Road requiring a 26.4m road reserve (Distributor / Collector Road) with a possible central median.
- As Estate Road 1 will possibly be a limited access road with a possible central median, access to the staff car park for Lot 2 is to be provided from an internal local industrial road.
- All vehicular access to Lots 10 and 11 shall be from an internal local industrial road and not from Estate Road 1.
- The proposed Freight Rail Easement shall show the access points as per the Draft Mamre Road Precinct DCP. The location and depth of the proposed box culverts within the north-east corner of the lot shall consider the vertical alignment of the future Freight Rail corridor.
- A design layout for the ultimate internal intersection of Estate Road 1 and the future north-south 'blue' high order road is to be provided. Penrith Council does not support a 2 lane roundabout in this location due to pedestrian safety concerns of crossing a 2 lane road with heavy vehicles.
- A mechanism for delivery of the ultimate intersection of Estate Road 1 and the future north-south 'blue' high order road is to be provided.
- The location of the future intersection of the 'brown' local industrial road to the south with Estate Road 1 is to be shown (Draft Mamre Road DCP Figure 14).
- The location of intersections are to be provided in accordance with the Draft Mamre Road DCP Section 3.4.1, Control 10, (i.e. minimum intersection intervals for local to collector/distributor 100-200m) and Control 20) (i.e. to accommodate the design vehicle (i.e. B-double and B-triple) the standard kerb return radius will need to increase from 12.5m to 15.0m).
- Turn paths for all internal intersection movements are to be provided demonstrating compliance with the Draft Mamre Road DCP Section 3.4.1, Control 19) (i.e. The internal road network needs to be designed for 26m long B-double (PBS Level 2 Type B) and tested for a 36m long B triple (PBS Level 3 Type A).
- A Stage 2 Road Safety Audit shall be submitted for review.

(b) **Stormwater**

- The Stormwater Drainage Master Plan (sheet CO14021.00-SSDA400) is inconsistent within the Overland Flow '1% Flood Levels and Depths Post

Development' plan (sheet CO14021.00F102) in the north-east corner of the development site. The flood study proposes two box culverts that are not replicated in the engineering plans.

- Engineering plans must show the proposed boundary of the ultimate Mamre Road, road widening alignment and the front landscape setback along Mamre Road.
- The proposal to provide Estate Basin1 as long 'strip' basins along the frontage of Mamre Road and within the front landscape setback area is not supported by Council.

The proposal does not provide an acceptable landscaping outcome along the main Mamre Road frontage of the estate, as the landscape buffer (located within the Mamre Road, road widening area) will be lost upon widening of Mamre Road with the drainage basin not providing any suitable landscape buffer treatment to Mamre Road.

4. **Environmental Management Considerations**

It is raised for the Department's consideration that the Detailed Site Investigation (**DSI**) recommends the preparation of a Hazardous Building Materials Survey prior to demolition and a Dewatering Management Plan (**DMP**) for the dams on site.

It is requested that DPIE require that the DMP must be prepared in accordance with the recommendations and findings of the DSI. Parameters to be sampled as part of the DMP include, but are not limited to, Dissolved Oxygen, Turbidity, Temperature, pH, Oxidation Reduction Potential, Conductivity, Total Dissolved Solids, Total Suspended Solids, Total Nitrogen, Total Phosphorous, Faecal Coliforms and the presence of oil and grease.

5. **Biodiversity Considerations**

(a) **Biodiversity and Landscape**

- The Landscape Plan must be amended to include spacing and deep soil plantings and include larger tree species endemic to the local areas such as *Eucalyptus moluccana*, *Eucalyptus tereticornis*, *Corymbia maculata*, *Eucalyptus fibrosa* etc.
- The proposed species *Waterhousia floribunda*, *Cupaniopsis anarcardioides* and *Tristaniopsis laurina* could supplement the larger trees.

(b) **Biodiversity Assessment – Green and Golden Bell Frog**

- It is requested that the Department seek an amended Biodiversity Development Assessment Report (**BDAR**) as BDAR has inadequately justified the exclusion for a number of species credit species including the Green and Golden Bell Frog (**GGBF**).

In Section 4.2 the justification of the exclusion of the GGBF is ‘the quality of the dams are poor’ and ‘The habitat is of poor quality and there is poor waterway connectivity to localities that have recent records and therefore the likelihood of occurrence of this species is low.

Despite this, the consultant has previously identified the site as containing potential habitat for the GGBF in the fringing and emergent vegetation surrounding the dams on site.

The justification for removal in this section is based on database records and has not demonstrate why the habitat is considered low and justify the reason to exclude this species from further assessment. The applicant should either engage a Species expert report, undertake targeted surveys, or assume presence.

(c) Biodiversity Assessment – Cumberland Land Snail

- It is also recommended that the mitigation measures outlined in Table 18 (column titled ‘Action’ are included in consent conditions, should the proposal be granted consent.

In addition to the proposed mitigation measures, it is also recommended that DPIE requires that pre-clearance surveys are undertaken for Cumberland Plain Land Snail despite the conclusions regarding the habitat suitability for the Cumberland Plain Land Snail.

(d) Dam Dewatering

- It is recommended that DPIE require that a dam dewatering plan is to be produced prior to the issue of a construction certificate or prior to works to outline the proposed strategy to dewater the dam.

The dam is large in scale and the proposed strategy for relocating aquatic fauna must be identified early and prior to works commencing, including identifying proposed relocation sites that can accommodate a large amount of aquatic fauna.

6. Landscape Considerations

(a) General

- The proposal is not supported mainly due to the Mamre Rd front setback which is compromised by the OSD and the persistent and substandard street tree and retaining wall treatments.

(b) Streetscape

- Continuous tree canopy is a necessity to enhance amenity in the public domain, assist in cooling hot pavements and contribute to the 40% canopy target in the draft DCP.
- Street trees are in groups of 3 and gaps between groups are between 20m and 50m apart. This does not satisfy ‘Better Performance’ as claimed in the Landscape Design Report and the lack of tree species diversity in Lot 2 does not satisfy ‘Better Look and Feel’.

- All street trees should be planted as per Council's Street and Park Tree Management Plan (includes use of organic mulches) as is required in the Draft DCP. It is considered that the use of climber *Clematis aristata* on the temporary fence is not viable due to site conditions which do not suit this species i.e. shade and cool deep soils.

(c) Setbacks and boundary interfaces

- The proposed 3m retaining wall at Basin 2 boundary and eastern corner of the subdivision is an unattractive and poor public domain interface with adjoining higher order roads identified at this location in the DCP (includes the freight road easement). The wall is not screened and would be difficult to maintain. It is recommended that the Department seek further design resolution from the application on this matter.

(d) Mamre Road frontage

- There is no screening of adjacent hardstand areas and only 1 tree per 20 car spaces along the Mamre Rd warehouse façade. Lot 3 is a thin reserve that offers minimal canopy and screening and will not perform the dense buffer effect envisaged along the Mamre Rd corridor.
- The 6m+ change in level between Mamre Road and building floor level further compromises the visual amenity of the road corridor streetscape – the bulk and scale of the built form cannot be adequately ameliorated. Hardstand areas are also not suitably screened.
- The proposal is in stark contrast to the stated outcomes of the Draft DCP and the vision for canopy, landscaping requirements and public domain to be high quality and with attractive streets.
- The Draft DCP objective of sympathetic earthworks at interfaces with public and environmental lands is not achieved.

Consistency along the Mamre Road streetscape to achieve a positive landscape character is imperative, including consistency of species.

Design coordination with other developments fronting Mamre Rd (approved and in design development) is necessary.

(e) Maintenance and operational

Lot 3 along Mamre Rd is provided as an alternative to appropriate front setback planting however it is unclear whether this lot will be owned and maintained by Lot 2 owners or to Council.

(f) Species and materials

There is a lack of tree species diversity, compromising biodiversity, visual amenity and wayfinding.

Whilst the plant schedule is comprehensive with shrub species, the design is limited in their use and retaining walls and large expanses of façade are not sufficiently screened for visual amenity from the public domain.

(g) Recommended sources

Penrith City Council is developing a recommended species list and welcome dialogue with designers to achieve appropriate and sustainable long term species selections for the public domain.

A Street and Park Tree Management Plan and Appendix is available on Council's website.

7. Heritage Considerations

Applicant has provided a Heritage Consultant report for both Aboriginal and non-Aboriginal archaeology. The report's recommendations regarding engagement of an Archaeologist during on site construction works is supported by Council.

Council requests that the Applicant's heritage consultants provide a report for approval by DPIE, prior to issue of Construction Certificate. The report should outline the details of consultants on site involvement during the Construction Works, what was found and what measures were taken regarding any archaeological findings, including details of any negotiations with local indigenous groups.

As the site is directly opposite a heritage item, current the building design should be further developed so that:

- A setback from the front boundary is appropriate, as per relevant DCP guidelines for the area.
- High quality landscaping especially adjacent to front boundary is further developed so that the bulk of building is ameliorated, again as per relevant DCP guidelines for the area as a minimum (greater setbacks may be required).

Council's Heritage Advisor has recommended that the front façade is sufficiently modulated along the long length of proposed frontage. It is noted that there is a corner feature that is modulated, however, all elevations and prominent points of view shall be treated in a similar regard.

8. Waterways Considerations

Council raises significant concerns in relation to the approach to stormwater management on this site.

As proposed, the development will seek to demonstrate compliance with the draft DCP Water management requirements as part of future development



applications and when the Mamre Precinct Regional Water Project is implemented by Sydney Water.

With regard to this approach, Council is of the view that the approach to stormwater management should be resolved prior to any approvals being granted. There remains uncertainty of the regional approach in terms of several key issues.

Due to the uncertainty and lack of detail with respect to the proposed regional solution, Council is of the view that the development proposal should be supported by a Stormwater Strategy that demonstrates how the development will be able to comply with the DCP in the absence of a regional system.

This would be more in line with the proposed approach in the Draft Technical guidance for complying with Wianamatta-South Creek stormwater management targets that have been circulated for comment (and was referenced in the report).

The following is also raised for consideration in the assessment:

- Stormwater treatment basins and associated gross pollutant traps must remain and be maintained in private ownership and must not be dedicated to Council.
- In terms of the water conservation measures, the Civil report includes commitments to meet a minimum of 80% non-potable demand with harvested rainwater. Additional details are to be provided to DPIE regarding the sizing of the tanks.
- In relation to the treatment of stormwater for the proposed development, it is proposed that each lot will have ocean guard pit inserts as well as 2 CDS GPTs and the Civil Engineering report indicated there will 2 bioretention systems with a combined filter area of 2,050m².

The report notes that each bioretention basin will also be pre-treated with a GPT, however, this is not shown on the plans.

All proposed GPTs are to be shown on plans to ensure their correct consideration and installation. The development includes Wianamatta trees (in the modelling) although no detail is included on plans. All details are to be provided on an amended set of plans which correlate, for the Department's proper consideration.

Clarification is also necessary, on the report and the design of the Wianamatta trees is required.

- The application proposes that the water quality and flow management targets for the full development of the estate will rely on the proposed precinct-wide approach to stormwater management including the use of regional basins. There are no details of this in the report about

certainty around the basins in terms of timing. I am of the view that the approach to stormwater management should be resolved prior to any approvals being granted.

- As proposed, the stormwater management approach is not consistent with Section 2.6 (Integrated Water Cycle Management) of the Draft DCP.
- With respect to the treatment of stormwater, all GPTs must be included on the plans and clarification on the design and locations of the proposed Wianamatta trees which was included in the MUSIC modelling is required.
- Council does not support the current design and configuration of the stormwater management basins.

On this matter, it is strongly recommended that the proponent be instructed to amend the design and configuration of the stormwater management basins. This should include but not be limited to the; inlet design and flow configuration; and provision for access for maintenance.

In this regard, there are many technical design guidelines available to assist in any revised design, including on Council's website which includes specifications for the design of bioretention systems.

Should you wish to discuss any aspect of Council's comments further, please do not hesitate to contact me directly on (02) 4732 8567.

Yours sincerely

Kathryn Saunders
Principal Planner