



Our reference: ECM Ref: 9686471
Contact: Gavin Cherry
Telephone: (02) 4732 8125

3 September 2021

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

Dear Ms Burn,

Replacement Response to Environmental Impact Statement: SSD-22191322 Oakdale West Estate Stage 5 at 2 Aldington Road, Kemps Creek

I refer to the Department's request to provide comments in relation to the above 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. Architectural Plans

- The Architectural Plans, referred to in the EIS were not available for review on the NSW Governments Major Projects Website (public exhibition platform) at the time of issuing Council's original comments. They have since been made available and have now been reviewed. No concerns are raised with the architectural design, form and finishes of the development. Further the indications of pylon directional signage and façade signage are reasonable and proportionate to the building scale.
- The plans indicate a maximum Ridge RL of 89.255 and an effective height of 13.7m. While it is appreciated that the method of building height measurement is not expressed in the DCP, it is typical and appropriate practice to measure height above natural ground level and not finished ground level established via a preceding earthworks development application. It is therefore recommended that natural ground levels (predating the approval of altered grounds levels) should be reflected on a revised elevation or section drawing to then confirm if the DCP requirements have been met.

2. Traffic Management and Road Wide Design Considerations

- The applicant is proposing for B-Doubles and B-Triples to access the site which are Restricted Access Vehicles that must only travel on approved routes or require permits from the National Heavy Vehicle Regulator. The swept paths provided by the applicant demonstrate that the B-Triples are not able to be accommodated by the current road design layout at a number of locations on the route to the site. The applicant should be required to redesign / reconstruct all affected sections of road to accommodate B-Triple swept paths with required clearances. Alternatively, B-Triple access should be refused / denied.

- If B-Triple or B-Double access is approved (and subject to the above broader road upgrade requirements) it is recommended that a condition be placed on the development for an operational traffic management plan similar to the one below that was placed on the St Marys Intermodal development.
- Prior to the commencement of operation, the Applicant must prepare an Operational Traffic and Access Management Plan (OTAMP) and submit it to the Planning Secretary for approval. The OTAMP must be prepared by a suitably qualified and experienced person(s) in consultation with Council and TfNSW. The OTAMP must address the following:
 - a) detail numbers and frequency of truck movements, sizes of trucks, vehicle routes and hours of operation;
 - b) detail access arrangements for the site to ensure road and site safety, and demonstrate there will be no queuing on the road network;
 - c) detail measures to ensure turning areas and internal access roads are kept clear of any obstacles, including parked cars, at all times;

3. **Biodiversity and Waste Management Considerations**

- Subject to the relevant mitigation efforts being implemented and monitoring and adaptive management being conducted, should any unforeseen impacts result, there is no concerns raised with the request for a waiver of BDAR reporting requirements.
- A minor amendment to the Waste Management Plan for Building 4E is however requested to be addressed by the applicant. As the transfer of refuse can represent a problem within Vegetation Management Plan areas, it is requested that the Waste Management Plan is updated to include a weekly inspection and removal of accumulated waste within the Vegetation Management Plan areas/waterway. In addition, at Table 6 of the Waste Management Plan, it is requested that the reuse of garden organics is not to occur within the Vegetation Management areas, and specify that garden organics must only be reused within the development footprint for landscaping treatments. It is also recommended that where possible, any overarching or associated waste management plans for previous stages be updated to reflect these same recommendations.

4. **Waterways Considerations**

- The proposed civil design plans confirm that a GPT will be provided, however the GPT sizing, and type was not confirmed. A CDS GPT will should be requested as per the approved overarching strategy for the development site.
- The site drains into bio basin No.4. All proposed WSUD systems must be accompanied by an electronic MUSIC model in sqz format to confirm compliance with councils WSUD policy. The MUSIC model is to include the bio-basin and a copy of this is requested to be made available for Council to verify compliance with the necessary performance targets.

5. Landscape Considerations

The following comments have been provided from Council's Landscape Architecture Unit and are requested to be considered and addressed in the assessment of the development application:-

Front Setback and Verge

- The proposed sandstone block features are not supported as they are an element of low visual quality and diminish streetscape quality. A more appropriate outcome would be to provide feature planting and feature canopy trees in these locations
- Vistas along Roads 07 and 06 terminate poorly at the development due to the bend in the road and the location of proposed driveways with infrastructure directly visible from the street. While opportunities are limited in this location, further consideration is requested as to how the resulting vista alignment can be improved by way of design changes via relocation of infrastructure or improved landscaping.
- Additional street trees are recommended to create a continuously canopied verges (excepting at driveways and street lighting)
- Fencing and gates along the front boundary should be setback min. 2m from the property boundary to allow for landscaping up to the boundary to reduce their visual impact
- Entry marker detail has been proposed at other developments. For wayfinding and placemaking, a different marker design should be provided. This may be designed with consideration of proposed signage, and vice versa. Entry markers should feature a tree of significant scale, as well as interest, noting that a significantly larger tree than the proposed Crepe Myrtle is recommended.
- Insufficient canopy plantings in front setback of entry areas is evident and this should be reconsidered.

Carpark Design

- It is considered there is insufficient canopy and cooling of the carpark. The planting proposed is not 'significant' in terms of tree canopy, as per the statement. Larger trees with broader canopies are appropriate and will provide greater cooling of pavement areas, meeting Council's Cooling the City and NSW Greener Places Guide objectives and targets.
- Carpark tree pit system – both an arborist and the 'strata cell or similar' product provider should be conditioned to certify or signoff that the planting details, size and specifications are appropriate to the species to be planted as well as the site conditions including soil and drainage, so that optimal conditions are provided long term for healthy tree growth to maturity.
- Mounding with shrub planting should be considered to contribute to the screening of parking areas from the public domain.

Boundary Landscape Design

- In areas of high visibility, palisade fencing is preferred over chain mesh eg. Truck entry/exit road
- An increase in the mix of tree species is required along boundaries for greater biodiversity and cooling - monocultures are a less resilient design response.
- Boundaries generally are inadequately landscaped. The graphics and annotations do not provide sufficient information to interpret the proposed scale, species mix and appearance of boundary treatments. Sections should also be provided of the full range of boundary situations and how landscaping is addressed. This is particularly relevant at the western boundary where significant retaining walls are provided without apparent landscape treatment such as screening (refer civil cross section 07). The design objective is to ensure canopy and screen planting along all boundaries will reduce the visual impact of the bulk and scale of the built form, large pavement areas, back of house and truck and car parking areas. This is particularly relevant at easement boundaries and high public domain visibility areas.
- Drainage pipework should be coordinated with landscaping so both can mutually co-exist without future damage or compromised objectives and outcomes

Other Design Considerations

- Further landscaping around the fire services area and other tanks is requested to be investigated.
- The staff rest area appears to have poor amenity and it is recommended that shade trees, seating and other amenity elements should be provided to ensure the space has attractive amenity for users
- Metrics of existing and proposed canopy area in relation to site area should be provided. Refer to canopy targets set in the NSW Greener Places Guide
- Landscape sections should reflect proposed level changes ensuring the design response is appropriate and enabling an appropriately considered assessment.
- It is requested that there is demonstration of safe and functional access to all landscaping for maintenance purposes, including between boundary fences and retaining walls.
- Section 8.2.1 Figure 10 of the Environmental Impact Statement demonstrates the built form blocks views to the horizon line of the mountains escarpment. It is considered the horizon line is worth preserving and if this is a key vantage point, roof height will need to be



carefully considered to retain views of the natural landform in the distance.

Should you wish to discuss the design matters within Section 4 of this letter, please contact Karin Felton – Landscape Architecture Supervisor – Design and Projects on (02) 4732 7583.

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

Yours sincerely

Gavin Cherry
Development Assessment Coordinator