



RESPONSE TO SUBMISSIONS

149 & 155 Airds Road, Minto

Prepared for
CHARTER HALL
 27 November 2023



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1. INTRODUCTION

1.1. PURPOSE OF THIS REPORT

This Response to Submission (**RtS**) report has been prepared by Urbis on behalf of Charter Hall Holdings Pty Ltd (**the applicant**) to address the matters raised by Campbelltown City Council (**Council**) during the assessment of Development Application 1234/2023/DA-I for the proposed development at 149 and 155 Airds Road, Minto (**the site**). Specifically, the proposed development refers to the (part) Lot 12 in DP 251997, Lot 131 in DP 583995 and Lot 213 in DP 260735.

1.2. PROJECT DESCRIPTION

1234/2023/DA-I seeks consent for the development of the site. At the time of DA lodgement, the proposed development comprised:

- Warehouse A: 6,640m² warehouse GFA and 300m² ancillary office GFA
- Warehouse B: 6,670m² warehouse GFA and 300m² ancillary office GFA
- Light industry: 13,316m² light industry GFA and 900m² ancillary office GFA
- Provision of three new vehicle crossovers from Airds Road
- Private access road and turning circle
- Hardstand and loading docks
- 177 car parking spaces
- Minor earthworks
- Subdivision into three new lots
- Provision of site infrastructure
- Hard and soft landscaping
- Estate and building identification signage.
- Operation up to 24 hours per day, seven days per week.

1.3. DESIGN AMENDMENTS

The following minor design amendments are proposed to address matters raised in the RFI letter by Council as well as other minor adjustments to the built form to respond to incoming tenant requirements:

- North building – Amalgamation of Warehouse A and Warehouse B into a single tenancy, including removal of intertenancy wall (**'Warehouse A'**)
- South building – Use of building as warehouse and distribution premises (**'Warehouse B'**)
- Changes to GFA, as follows:
 - Warehouse and distribution centre: 23,167sqm (+9,857sqm GFA from original proposal)
 - Light industries: 0sqm (-13,316sqm from original proposal)
 - Office: 1,248sqm (-252sqm from original proposal)
 - Total GFA change: -3,711sqm from original proposal
- Amended number of loading docks to Warehouse B, as follows:
 - Five (5) recessed loading docks
 - Five (5) roller shutter doors
- Reallocation of parking, as follows:

- Warehouse A: 75 spaces (+3 spaces from original proposal)
- Warehouse B: 81 spaces (-24 spaces from original proposal)
- Retention of additional existing trees at east and west frontages
- Relocation of Fire Services Sprinkler Tank, Pump Room, and Fire Standing Area to north-west frontage of Warehouse A
- New Fire Services Sprinkler Tank, Pump Room, and Fire Standing Area to north-west frontage of Warehouse B
- Deletion of office at north-west corner of Warehouse B
- New dock office at northern elevation of Warehouse B
- Realignment of retaining wall around south-east corner of the site
- Awnings above roller shutter loading docks at both buildings reduced to 3m in width
- Relocation of Warehouse B waste storage area to centre of north elevation
- Relocation of staff outdoor areas to offices at north-east corners (Warehouse A & Warehouse B)
- Consolidation bike parking areas at north-east frontages of Warehouse A & Warehouse B
- Minor internal reconfigurations in office spaces (no changes to GFA).
- Amendments to the subdivision plan to show cut back kerb within the entry to the private estate road.

1.4. SUPPORTING DOCUMENTATION

This RtS Report is supported by the following technical reports and documentation:

- Amended Architectural Plans prepared by Watch This Space Design.
- Amended Landscape Plans prepared by Habit8.
- Amended Civil Drawings by Costin Roe Consulting.
- Amended Civil Engineering Report by Costin Roe Consulting.
- Amended Transport Assessment prepared by Ason Group.
- Amended Biodiversity Development Assessment Report prepared by Ecoplaning.
- Amended Aboricultural Impact Assessment and Tree Protection Management Plan by Canopy Consulting.
- Amended Waste Management Plan prepared by JBS&G Australia Pty Ltd.
- Amended Fire Safety Strategy prepared by Core Engineering Group.
- Amended Accessibility Review Report prepared by ABE Consulting.
- Amended Regulatory Compliance Report prepared by McKenzie Group.
- Amended Subdivision Plan prepared by LandPartners.
- Correspondence from LandPartners regarding potential drainage easement.
- Campbelltown (Sustainable City) DCP 2015 (**CDCP 2015**) Part 2 Assessment Table prepared by Urbis.

2. RESPONSE TO SUBMISSIONS

This section provides a detailed summary of the applicant's response to the issues raised by Council in the Request for Information (RFI) letter dated 7 August 2023.

2.1. PLANNING ISSUES

Table 1 RFI Planning Issues

Issue	Response
1. Amended elevation plans are required noting the existing ground level and the maximum building height level under the provisions of Clause 4.3 of Campbelltown Local Environmental Plan 2015.	The elevation drawings have been updated to note the existing ground level and maximum building height level under the provisions of Clause 4.3 of the Campbelltown Local Environmental Plan 2015.
2. Amended architectural plans showing consistency with the landscape plan by detailing all trees to be removed on the architectural plans.	The architectural plans have been amended and are now consistent with the landscape plans. The plans both show consistency in which trees will be retained and which trees will be removed.
3. Amended plans demonstrating the front façade of the buildings to be consistent with Section 7.2.1(a)(iv) in terms of the amount of masonry to be provided.	<p>This control of the DCP is intended to reduce the perceived bulk and massing of new industrial development through the use of traditional materiality. It is noted that external brick finishes are present at smaller-scale industrial premises within the area, however the larger, modern developments are more readily characterised by cladding, concrete, and rendered external finishes. To this end, the proposed materiality of the new development being a combination of metal cladding and precast concrete, is appropriate and consistent with the surrounding industrial character.</p> <p>The façade treatment has been updated as part of this amended scheme and now incorporates differentiated colours, proportions, and textural qualities. Materials will be predominately metal cladding (including Colorbond Clip-Lock, metal panels and louvres, and precast concrete). This is considered appropriate for this type of development, as well as in the broader context of the area which demonstrates a variety of external finishes and details. The proposed materiality and façade design reduces the perceived bulk and massing of the development.</p> <p>Further, this proposed materiality is more sustainable than the masonry requirement, containing less heat in the building, and reducing the embodied carbon of the development. Importantly, this will enable Charter Hall to achieve their own commitment of having all industrial assets being net zero before 2035.</p>
4. Amended architectural plans detailing a minimum 30m setback from the boundary fronting	The VIA submitted with the DA concluded that impacts to views to the site from Campbelltown Road as a result of the proposed building footprint are, at most, minor. This is due to the distance

Issue	Response
<p>Campbelltown Road. In addition, 50% of the width of this setback is to be landscaped and as such the landscaping plan is required to be amended.</p>	<p>of the site from the roadway, the existence of retained and new trees along this frontage, and the present condition of the site, which is defined by large-format industrial development, not being viewable from Campbelltown Road or the residences across Campbelltown Road to the west. The recessive external colour scheme and modest scale of the development will also assist with mitigating potential adverse visual impacts.</p> <p>The proposed development provides between 25.38m and 19.5m setback to the site boundary, noting that the warehouse buildings are generously setback between 44.12m and 126.02m from Campbelltown Road itself. The updated scheme submitted as part of this RtS retains 9 additional trees, 6 of which are at the Campbelltown Road frontage, and which were proposed for removal as part of the original scheme. These additional mature trees will provide screening during the entire operational life of the warehouse, providing screening to Campbelltown Road. It is also noted that a 5m landscape setback from Campbelltown Road forms part of the 19.5m setback, providing a suitable visual and environmental buffer between the development and the roadway. The VIA confirms this stating the visual impact to Campbelltown Road is negligible due to the setback and screening.</p>  <p>Accordingly, no additional setbacks have been provided as part of the revised scheme. Having regard for the overall minor visual impacts of the new development, the distance of the building footprint from Campbelltown Road, and the proposed landscaping, including the retention of 6 trees along the Campbelltown Road frontage, the setbacks as currently proposed are considered appropriate and will result in acceptable environmental impacts.</p>
<p>5. Information is to be submitted on the dimensions and total advertising area of the proposed signs on the</p>	<p>The architectural plans have been updated to include dimensions of signage which will be fixed to the building elevations. These include:</p>

Issue	Response
<p>elevations of the building if they are required to be approved under the current development application. If they are not proposed as part of the subject development application, the signs need to be removed from the elevation plans.</p>	<p>Warehouse A:</p> <ul style="list-style-type: none"> East Elevation – 7,710mm x 1,500mm West Elevation – 7,800mm x 1,500mm <p>Warehouse B:</p> <ul style="list-style-type: none"> East Elevation – 7,800mm x 1,500mm West Elevation – 7,800mm x 1,500mm
<p>6. An amended Statement of Environmental Effects is required to address Part 2 – Requirements Applying to All Types of Development under the provisions of Council's Sustainable City Development Control Plan 2015.</p>	<p>An assessment table for Part 2 of Campbelltown Sustainable City Development Control Plan 2015 (CDCP 2015) has been prepared and provided with this RtS Report. The proposed development is wholly consistent with the requirements of Part 2 of CDCP 2015.</p>
<p>7. The number of car parking spaces do not comply with the required number for warehouses A & B. Given that subdivision is proposed, the number of car parking spaces to be provided for each site should be based on the building on that lot only and not in total over both lots. In this regard, a gross floor area plan is to be provided noting the areas of the office and warehouse areas with parking provided based on these calculations per lot. It is noted that warehouse A & B do not provide the required number of car parking spaces on the lot and therefore will not be supported by Council.</p>	<p>Based on the amended proposal, the following minimum car parking requirements (per the DCP) are:</p> <p>Warehouse A</p> <ul style="list-style-type: none"> Office use – 16 spaces Warehouse & distribution use – 57 spaces Total – 73 spaces <p>Warehouse B</p> <ul style="list-style-type: none"> Office use – 17 spaces Warehouse & distribution use – 59 spaces Total – 76 spaces <p>The revised scheme provides 75 spaces for Warehouse A and 81 spaces for Warehouse B. This exceeds the minimum DCP requirements.</p>
<p>8. Amended floor plans are to be provided with any internal areas of the loading docks to be noted on the plans.</p>	<p>The floor plans have been updated to show internal loading dock areas.</p>

2.2. ENGINEERING ISSUES

Table 2 Engineering RFI Response

Issue	Response
9. The proposed right of access (12m wide) in the subdivision plan should be consistent with the proposed driveway which shows the cut back kerb to accommodate 20m Articulated Vehicle.	The subdivision plan has been updated to be consistent with the proposed driveway.
<p>10. The following flooding issues are to be addressed:</p> <ul style="list-style-type: none"> The finished floor level of the proposed development such as Warehouse 2A, Warehouse 2B and Warehouse 3 at or above the 1% AEP flood level plus 0.5m freeboard is to be provided. The flood depth map provided in asc format seems to be wrong as the depth varies from 1 to 6. The flood depth maps for different flood events and provide the correct flood depth maps for different storm events need to be verified. The flood hazard map in the hazard level H1 to H6 for different flood events should be provided. The flood level maps in the proposed development scenario depict that the flood level within the site increased. Hence, there will be significant increase in the flood level in the site. The input parameters for the pre and post-development scenarios such as Manning's n, DEM, blockage etc needs to be checked. In addition, it should be demonstrated that there will be no adverse impacts on flooding elsewhere due to the proposed development. 	<ul style="list-style-type: none"> Finished floor levels are proposed at 0.5m above the 1% AEP level (refer to Section 7.2.4 of the Civil Engineering report). Flood depth figures are included in Section 7 and Figure E13 of the Civil Engineering report. Hazard levels on the site at 5% AEP post-development are H1 and H2 only. Higher hazard levels are found east of the site, on the opposite side of Airds Road. Flood hazard maps have been prepared and are included in the updated civil engineering drawings, reflecting hazard levels H1 to H6 for different flood events. The increase in water level heights within the site are due to the site being raised to (generally) 0.5m above the 1% AEP. As the site levels increase, the water levels (associated with the site runoff) also increase. The on-site water level increase does not impact surrounding properties, as confirmed by the flood level mapping. <p>Costin Roe Consulting has confirmed that the flood modelling has been completed using CSS, Campbelltown Council's preferred flood modeller, using standard Council blockage factors and roughness factors.</p>
11. The 88b instrument document for the existing drainage easement is to be provided to Council.	The correspondence from LandsPartners confirms that no drainage easement exists over the site. As such, no s88b instrument can be provided.
12. The provided DRAINS model shows that post-development flow is less than the pre-development flow, which is incorrect due to wrong assumptions in the input variable. The detailed calculations of stormwater drainage network for the pre-development and post-development scenarios using DRAINS software should be provided.	The DRAINS modelling completed as part of this DA is a simplified catchment assessment to confirm pre- and post-development flows. The model does not propose to provide for detailed modelling of the total drainage network. The latter would form part of the Construction Certificate design phase and is

Issue	Response
	not required be provided at the DA stage of the development.
13. The MUSICX model needs to be re-run using the meteorological data (rainfall data and PET data) from the nearest meteorological stations. The soil type considered in the MUSICX model does not match with the soil type suggested by the geotechnical report. The soil type should be amended while running the MUSICX model.	The MUSICX model has been re-run utilising the Liverpool AWS which has a comparable mean annual rainfall to Campbelltown. Further, the soil type from the geotechnical report has been integrated into the proposed MUSICX model.
14. The bulk earth plan must demonstrate the depth for different colours used. The cross-section of bulk earthworks plan must be shown in the plan.	Updated civil engineering drawings have been provided with this RtS, showing the depth for different colours used. Cross-section drawings have also been provided.
15. The Transport Assessment states that the car park is designed for User Class 1A. As User Class 1A is restricted to residential, domestic and employee parking and the proposed development is industrial development, the applicant needs to design the car park for User Class 1. The final plan of car park should be consistent with the swept path assessment.	The Transport Assessment prepared by Ason Group as part of this RtS has found that all standard staff and visitor parking in the development is provided in accordance with AS2890.1 for Class 1 users, and that parking spaces are generally designed in accordance with AS2890.1:2004.

2.3. ENVIRONMENTAL ISSUES

Table 3 Environmental RFI Issues

Issue	Response
16. The proposed development has failed to demonstrate how it has been designed and sited to avoid and minimise impacts to biodiversity as required under Section 1.3 and Section 6.4(1) of the NSW Biodiversity Conservation Act 2016 and has instead jumped straight to offsetting. It is noted that the proposed development proposes the removal of all native vegetation from the site, comprising the critically endangered ecological community Shale Sandstone Transition Forest and Coastal Swamp Oak Forest. It appears that the size and extent of the proposed development footprint has limited the proposals ability to give reasonable consideration to avoiding and mitigating impacts to biodiversity of the site. The mitigation hierarchy requires genuine attempts to be made, and take all appropriate measures to avoid and minimise impacts on threatened species and	<p>A primary consideration in designing the development, including siting the new built forms and managing impacts to remnant vegetation, has been the avoidance of flooding impacts. To this end, the site level and FFL has been raised to meet the flood planning level of 1% AEP plus 500mm. Not raising the site levels would have permitted greater retention of vegetation, however the resultant development would be flood affected endangering occupants and producing a poor site outcome.</p> <p>To better balance the consideration of flood planning and mitigating impacts on vegetation, the revised scheme includes amendments to the retaining wall strategy and site planning, enabling the additional retention of 9 remnant trees (including 3 High Retention Value trees). This tree retention has also been made possible due to a</p>

Issue	Response
<p>ecological communities be demonstrated before the Biodiversity Offset Scheme (BOS) be applied.</p> <p>Accordingly, the proponent is required to revisit the design of the proposed development, and demonstrate how it has been sited and designed with consideration to avoiding impacts to biodiversity through minor reconfigurations and design iterations to the building footprint. In this case, consideration should be given to reducing the developable area of the proposal. The BDAR is to be updated with this information, and resubmitted to Council.</p>	<p>review of swept paths to the loading docks at the site's north-east corner, which have since been amended as part of the updated scheme. As such, the revised development now retains as much native vegetation as possible given the site's flood constraints, providing an optimised landscape outcome.</p> <p>The updated scheme now proposes:</p> <ul style="list-style-type: none"> ▪ Removal of 84 trees ▪ Retention of 34 trees ▪ Planting of 139 new trees. <p>The Arboricultural Impact Assessment finds that the 60 trees proposed for planting will be capable of achieving significant physical dimensions to offset any loss of amenity, with the temporary loss of amenity likely to be offset in the short to medium term.</p>

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