

16 December 2022

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Department of Planning and Environment

Our reference: R/2022/26

Your reference: SSD-42544484

Subject: Gardeners Road Multi-Level Warehouse Alexandria and Distribution Centre -
Advice on EIS

Thank you for your correspondence dated 14 November 2022 inviting the City of Sydney Council ("the City") to comment on the proposed State Significant Development (SSD) application for a new multi-level warehouse and distribution centre at 546-548 Gardeners Road, Alexandria.

The application seeks consent for the following:

- Demolition of all existing structures and buildings on site,
- Construction of a multi-level warehouse and distribution centre arranged into southern and northern volumes connected by a central hardstand area,
- Rooftop garden areas,
- 90 car parking spaces,
- Bicycle and end of trip facilities,
- Site landscaping,
- Business identification signage,
- Operational hours as 24 hours, 7 days a week.

The City has reviewed the submission and provides the following comments for your consideration.

Relationship with South Distribution Centre

The adjoining site to the west is known as the Southend Distribution Centre at 63 Campbell Road, which is a warehousing building that is over 50 years old. The adjoining site includes a private road

along the northern side of the joint boundary with the subject site. The proposed development includes vehicular access from this private road off Campbell Bridge Road. The City consider that the the relationship between the subject site and the adjoining Southend Distribution Centre is important and should be carefully treated.

The visual impact assessment undertaken should further assess the potential visual impact on the Southend Distribution Centre. The relationship between the proposal and the adjoining site should also be improved, by reinforcing the edge of the private road within the subject site, with elements to address this interface potentially comprising complementary canopy planting etc. The proposed colour palette should also be reconsidered to more relate to the brownish tones of the adjoining site.

Tree Removal and Planting

The proposed development results in the removal 73 trees. 11 of these trees to be removed are of high retention value, as identified in the submitted Arboricultural Impact Assessment (AIA). As outlined in the AIA, high retention value trees should be considered as a site constraint and it may be required that alterations to the proposed development design and/or specific protection measures are undertaken to allow for the retention of these trees. The City consider that design modifications be explored to ensure appropriate setbacks are provided from these trees, as well as tree sensitive constructions be applied to allow for the retention of these trees. The AIA should be updated to provide an assessment of the impact of these trees in line with of *Australian Standard 49702009 Protection of trees on development sites* and outline recommendation for tree sensitive construction adjacent to trees with major encroachments to the Tree Protection Zones.

Section 3.5.2 of the Sydney DCP 2012 requires tree canopy cover be considered and provides at least 15% canopy coverage of a site within 10 years from the completion of development. Noting to reduce urban heat island effects and mitigate a warming climate, all developments located outside of Central Sydney are to contribute greening to achieve a 40% green cover, including 25% canopy cover by 2050. It is required that a canopy cover loss and replacement analysis is prepared and submitted that demonstrates the proposed replacement canopy cover at 10 years.

The landscape plans indicate that 9 new trees are proposed, using 3 tree species and only 1 is a large sized tree species. The City note that the majority of new plantings are understory species. Section 5.8.3.7 (7) of the Sydney DCP 2012 requires that, in addition to perimeter planting, one medium sized be planted and maintained in deep soil with a minimum 3m dimension, and for every four parking spaces another medium sized tree be planted. There are 90 car parking spaces at grade of which 38 are open to the sky. The control requires 9-10 trees; however, no new medium sized trees are proposed to car parking spaces. Confirmation is requires that replacement tree planting includes an increase in new medium and large tree species and submit an updated plant schedule with mature height and spread of all trees and quantities. It is also required that an amended parking layout is

submitted that makes allowance for tree planting and a compliant scheme.

Communal Open Space

The proposed roof terraces on the north and south buildings appear to comply with the requirements of Section 5.8.3.6.4 of the Sydney DCP 2012 relating to private communal open space in IN1 General Industrial zones. The roof terraces are accessible by lift or stairs from office areas below, and the design allows for seating areas, landscaping and shade structures.

However, there is insufficient information regarding the following:

- Clarification is required regarding the design of the roof terraces in terms of sections and details for rooftop structures including walkways, balustrades and shade structures.
- Updated plans are to be provided with levels (SSL, RL and TW), typical planter details and rainwater outlets connected to the stormwater system.
- Confirmation is required regarding the soil volume for all new trees to comply with the Landscape Code Volume.

Deep Soil

Section 5.8.3.6.1 of the Sydney DCP 2012 requires lots located in IN1 General Industrial zones to provide a minimum of 15% of the site area as unimpeded deep soil. The deep soil should be located in the front landscape setback and external breakout spaces with a 3 metre minimum dimension in any direction.

Without measuring all landscape areas free of rainwater tanks and drainage devices, it is difficult to confirm the deep soil numeric as stated in the submitted EIS. The architect's plans include a landscape plan (dwg SSD-A02 1004 [A]) however it does not identify unimpeded deep soil areas. The landscape plans outline the works at grade in deep soil zones, however, these include raingardens or wetlands on the eastern boundary that may reduce deep soil provision.

It is recommended that a deep soil plan is provided that identifies 15% of the site as unimpeded deep soil (above and below ground). All deep soil areas are to be a minimum 3m dimension in any direction.

Landscaping

The SEARs included the requirement for a detailed site-wide landscape plan, however the subject application is not accompanied by this. Please submit for review.

Storm water

The submitted civil storm water drainage plan makes no allowance for drainage to landscape areas of the site including raingardens and WSUD devices proposed by the landscape architect. Coordination

is required to ensure that all landscaped areas of the site have drainage provision and allows for irrigation (that complies with Section 5.8.3.6.1 of the Sydney DCP 2012). The plans also indicate a ground rainwater tank on the northwest of the warehouse and to the southwest in garden bed, however is not clear if this tank makes allowance for rainwater harvesting from the two warehouse roofs for irrigation reuse.

The City has adopted MUSIClink for assessing Water Sensitive Urban Design (WSUD) compliance for developments. A storm water quality assessment for the proposed development must be prepared and comply with the City's specific modelling parameters as adopted in MUSIClink. A certificate and/or report from MUSIClink and the electronic copy of the MUSIC Model must be submitted for review and approval with the storm water quality assessment report.

Flooding

The submitted Water Cycle Management Strategy report provides comments regarding existing flooding condition for the subject site. The City does not support the preparation of the report using information extracted from flood maps available in the City's flood study reports. Instead, a site-specific flood assessment report is required that contains flood modelling for pre and post-development scenarios and is based on the City's Truflow model.

Recommended flood planning level/s are to be determined in accordance with Section 5 of the City's Interim Floodplain Management Policy, and the assessment is to address the requirements of Section 6 of the Policy.

The following is also noted:

- The proposed lift access should be clear of the 1% AEP level, or at minimum, the electrical connections/controls place above the flood level.
- Potential flooding from the road access from the neighbouring site at 63 Campbell Road is to be addressed in post-development modelling.
- The recommended measures based on post development flood modelling should not increase flood levels offsite and must not divert overland flow to neighbouring properties.

Public Domain

The existing public domain along the site's frontage to Gardeners Road was reconstructed in 2019 and 2020 and is in a good condition. The proposed exit on Gardeners Road is in a location where substations, a street light pole and two new kerb inlet pits were recently constructed by TfNSW. Further design consideration and consultation with TfNSW regarding the layback location and size should be undertaken. The proposed new vehicular crossings on Gardeners Road must be designed in accordance with the City's standards and specifications, and the laybacks are to be in accordance with

TfNSW requirements.

The vehicular access points via the neighbouring site at 63 Campbell Road are to be designed to matched the approved design of the recent consent for this site, D/2021/525. Coordination with this approval is to be undertaken, to ensure there are no conflicts with the approved fire brigade set down area etc.

A public domain levels and gradients plan is to be submitted, which is to include cross sections through driveways and building entrances from inside the building to the centreline of the road carriageway. The existing and proposed boundary levels, top of kerb levels and invert of gutter level are to be clearly shown, and the proposed flood planning level is to be indicated in the sections. Longitudinal sections showing existing and proposed boundary levels, top of kerb levels and back of footpath levels on the same longitudinal section must be submitted for frontage along Gardeners Road and the private road at 63 Campbell Road.

Height

It is noted that the proposal exceeds the 18m height control on the northern portion of the site. The City raises no objection to the height exceedance, subject to all services and plant (excluding PVs) being concealed from views from the public domain. This needs to be demonstrated in any future submission of additional information.

Parking and Access

While the development proposes a compliant number of bicycle parking spaces and end of trip facilities, the application does not specify the numbers by type. A minimum of 21 employee spaces (17 for office staff and 4 for warehouse staff) and 8 visitor parking space for office visitors is required. Staff bicycle parking is to be Class 2, and visitor bicycle parking should be Class 3 and located in a publicly accessible area in proximity to the building entrance.

Additionally, clarification is required regarding the maximum size of vehicles to be used on each of the access and egress routes.

The City also requests input into any future conditions of consent, should DPE recommend approval.

Please contact Mia Music on 02 9246 7283 or by email at mmusic@cityofsydney.nsw.gov.au if you need to discuss your request.



